



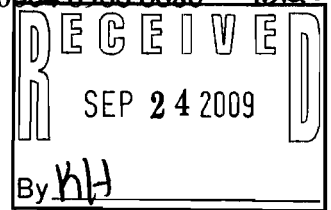
Allen

NORTH LITTLE ROCK WASTE WATER UTILITY

September 23, 2009

Certified Mail # 7003 3110 0004 6966 6680 7222

Allen Gilliam, State Pretreatment Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118



6000274

Re: Responses to requirements and recommendations in ADEQ letter dated 9-8-09, "North Little Rock (NPDES Permit #AR0020303; AFIN #6004318) Pretreatment Program Modification Submittal to meet the Revised Streamlining Revisions in 40 CFR 403"

Handwritten notes: City addressed & corrected all requirements & included recommend. Program deemed complete & current w/ 403 AF

Dear Mr. Gilliam,

The required actions and recommendations per above referenced letter have been incorporated into the North Little Rock Waste Water Utility's Pretreatment Program.

Find below the required actions and the corrective actions taken along with responses to the recommendations.

Enforcement Response Plan (ERP) Section

Required Action:

1.) The revised ERP removed Section IV.B, "Show Cause Hearing". Retain this section as it is an enforcement option the City has legal authority to utilize (Ordinance Section 10.4). This enforcement option is also listed in the Program's ERP Enforcement Response guide (ERG).

Corrective Action Taken:

Section IV.B, "Show Cause Hearing" was omitted by mistake during the process of updating this plan. This section has now been readmitted to the Enforcement Response Plan (ERP).

Required Action:

2.) The revised ERP removed Section IV.C, "Administrative Penalties" for which the City has the legal authority to use (Ordinance Section 10.7). Retain this section and

Response to Recommendation:

This section was revised to include updated agreements and ordinances.

### **Wastewater Discharge Permit**

Recommendation:

1.) Include on the first page of the permit your specific legal authority (Ordinance # 8094 or City Code Annotated section). See second bullet in Section 6.2 of EPA's "[IU] Permitting Guidance Manual" (9/89).

Response to recommendation:

Revised Wastewater discharge Permit to reflect Ordinance # 8094 as the legal authority.

Recommendation:

2.) Page 9, Item #7: Recommend including "Failure to meet effluent guidelines or applicable Best Management Practices." This revision coincides with 40 CFR 403.8(f)(1)(B)(iii)(3).

Response to Recommendation:

Revised Item #7, to include language, "Failure to meet effluent guidelines or applicable Best Management Practices."

Recommendation:

3.) Section 11, "Special Conditions": Does the City intend to require "a Slug Load/Discharge Control Plan" regardless of the facility's potential? If this is an "as required" basis, please clarify.

Response to Recommendation:

No, Section 11, "Special Conditions" will only be used as part of a Discharge Permit if the facility has the potential to have a slug discharge. This section is where we would require a facility to submit a "Slug Control Plan".

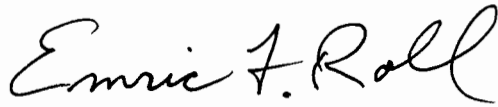
Noted typos, in the Wastewater Discharge Permit have been corrected.

As requested we are submitting the entire updated Pretreatment Program which incorporates the above required and recommended changes, as preferred in electronic format. CD-ROM Enclosed with following documents attached:

- NLR Waste Water Utility Wastewater Discharge Permit (Blank)
- NLR Waste Water Utility Pretreatment Program Structure and Organization
- NLR Waste Water Utility Enforcement Response Plan
- NLR Waste Water Utility Enforcement Response Guide [Exhibit A]

If you have any questions concerning the above responses, please contact me at (501) 945-7186 ext.117.

NORTH LITTLE ROCK WASTE WATER UTILITY

A handwritten signature in black ink that reads "Emric F. Roll". The signature is written in a cursive style with a large, prominent "E" and "R".

Emric F. Roll  
Pretreatment Coordinator, NLRWWU

North Little Rock/Water Meter Unit  
P.O. Box 42898  
North Little Rock, AR 72117

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