



NORTH LITTLE ROCK WASTE WATER UTILITY

February 24, 2009

Cert. No. 7006 0100 0003 3856 6508

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Allen Gilliam
Arkansas Department of Environmental Quality
Pretreatment Coordinator
5301 Northshore Drive
North Little Rock, AR 72118-5317

FEB 26 2009

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necessary
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Re: Reply to City of North Little Rock (NPDES #AR0020303; AFIN #6000274)
Pretreatment Program Audit/Municipal Pollution Prevention (P2) Assessment

Dear Mr. Gilliam:

Thank you for the objective audit/assessment conducted on November 12th through November 14th, 2008. We received your final audit report on February 4, 2009. As always, we enjoyed working with you and value your constructive evaluation of our Pretreatment operation.

We have completed the required actions as set forth in your Summary of Findings as follows:

We have corrected Koppers Industries Wastewater Discharge Permit to include units on their discharge limits. We have mailed a revised permit to Koppers and have placed a revised copy in our files.

We have mailed out notifications to the Utility's SIUs of the revised CFR 403 Regulations (Streamlining Rule Change).

We have mailed out notifications of reporting requirements on Hazardous Waste Disposal to potential generators.

During the file review, it was noted that the inspections at Koppers and L'OREAL did not indicate that they were hazardous waste generators. These two (2) companies were listed on the ADEQ list of generators. The inspection forms should have denoted this or the discrepancy from the ADEQ's list needs to be rectified by the industries. We have noted on Koppers and L'OREAL's inspection forms that they are a Hazardous Waste Generator under RCRA Regulations and that the hazardous waste is hauled off-site for disposal. There is no discharge of this material to the sanitary sewer system.

NPDES PERMIT FILE

NPDES # AR0020303
AFIN # 6000274-6000274

Permit PN

Pretreatment Correspondence

Technical Backup

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We are reviewing and considering the additional nine recommendations that you included in your assessment.

Again, we appreciate your input and recommendations as we work towards continuous improvement of our pretreatment program. Please contact us with any further questions or recommendations.

Sincerely,

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

Emric F. Roll
Superintendent of Operations/Pretreatment Coordinator