



May 29, 2019

**CERTIFIED MAIL 9489 0090 0027 6060 6314 88**

Honorable Darrell Trahan, Mayor  
City of Huntsville  
P.O. Box 549  
Huntsville, AR72740

RE: NPDES Permit Number AR0022004 AFIN: 44-00018  
Request for a Corrective Action Plan

Dear Mayor Trahan,

ADEQ has conducted a review of the certified Discharge Monitoring Reports (DMRs) submitted by the facility from May 1, 2016 through April 30, 2019. The review revealed that twelve (12) violations of the permitted effluent limits have been reported. A detailed list of the violations is included with this letter. As a result of this review, ADEQ requests that the City of Huntsville submit the following documentation to the ADEQ Water Division Enforcement Branch:

- A Corrective Action Plan (CAP). The CAP shall be certified by a Professional Engineer (PE) registered in the state of Arkansas and at a minimum, the CAP shall include the following information:
  - o The cause(s) of the effluent violation(s).
  - o Evaluation of the current permitted treatment system for compliance within the requirements of your permit.
  - o The actions to be taken to correct, and prevent, the recurrence of the effluent violations.
  - o A milestone schedule for compliance with the permit effluent limits, with a final date of compliance.

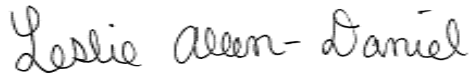
The CAP should be submitted to the Department no later than **July 1, 2019**. The document may also be emailed to me at [allen-daniel@adeq.state.ar.us](mailto:allen-daniel@adeq.state.ar.us). Please make sure you also sign the CAP along with the engineer. If an extension is needed, please submit documentation in writing with the reason and amount of time needed, before the **July 1, 2019**, due date.

Any violation of your NPDES Permit is subject to enforcement action by this Department, pursuant to the Arkansas Water and Air Pollution Control Act, which may include the

assessment of a civil penalty. The regulations and your NPDES Permit require that you take all reasonable measures necessary to eliminate or prevent the occurrence of violations.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0630 or at [allen-daniel@adeq.state.ar.us](mailto:allen-daniel@adeq.state.ar.us).

Sincerely,

A handwritten signature in cursive script that reads "Leslie Allen-Daniel".

Leslie Allen-Daniel  
Enforcement Analyst  
Office of Water Quality, Enforcement Branch

## Reported Effluent Violations From 5/1/2016

### City of Huntsville

DMR End Date	Discharge Number	Parameter Description	DMR Value Qualifier Code	Reported DMR Value	Permit Limit	Vio %	Violation Type	DMR Value Type Code	Parameter-Mon. Location-Season
09/30/2017	001-A	Nitrite + Nitrate total [as N] (MO AVG, mg/L)	=	10.6	10	6%	Numeric Vio	C 2	00630-1-0
03/31/2018	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	=	8000	2000	300%	Numeric Vio	C 3	74055-1-1
06/30/2018	001-A	Nitrite + Nitrate total [as N] (MO AVG, mg/L)	=	10.1	10	1%	Numeric Vio	C 2	00630-1-0
10/31/2018	001-A	Nitrite + Nitrate total [as N] (MO AVG, mg/L)	=	11	10	10%	Numeric Vio	C 2	00630-1-0
11/30/2018	001-A	Nitrite + Nitrate total [as N] (MO AVG, lb/d)	=	193.4	166.8	16%	Numeric Vio	Q 1	00630-1-0
11/30/2018	001-A	Nitrite + Nitrate total [as N] (MO AVG, mg/L)	=	16.8	10	68%	Numeric Vio	C 2	00630-1-0
11/30/2018	001-A	Nitrite + Nitrate total [as N] (7 DA AVG, mg/L)	=	18.4	15	23%	Numeric Vio	C 3	00630-1-0
12/31/2018	001-A	Nitrite + Nitrate total [as N] (7 DA AVG, mg/L)	=	21.6	15	44%	Numeric Vio	C 3	00630-1-0
01/31/2019	001-A	Nitrite + Nitrate total [as N] (MO AVG, mg/L)	=	10.8	10	8%	Numeric Vio	C 2	00630-1-0
02/28/2019	001-A	Nitrite + Nitrate total [as N] (MO AVG, lb/d)	=	206.4	166.8	24%	Numeric Vio	Q 1	00630-1-0
02/28/2019	001-A	Nitrite + Nitrate total [as N] (MO AVG, mg/L)	=	13.4	10	34%	Numeric Vio	C 2	00630-1-0
02/28/2019	001-A	Nitrite + Nitrate total [as N] (7 DA AVG, mg/L)	=	16.4	15	9%	Numeric Vio	C 3	00630-1-0