

Kayla L. Grabinski

From: Kayla L. Grabinski
Sent: Monday, June 24, 2024 3:56 PM
To: TWU-Key, Sandra
Cc: TWU-Crittenden, Donnie; gsmith@txkusa.org; Leslie Allen-Daniel (adpce.ad)
Subject: RE: NCR and CAP Request - Texarkana, City Of-North WWTP (AR0048691)
Attachments: ncr-form.pdf

RE: NPDES Permit No.: AR0048691, AFIN: 46-00237
Non-Compliance Report Request

Hello Sandra,

Thank you for returning my email about NCRs for your facility. I see that I miscommunicated some DMR monitoring period end dates for some violations. My goal is to make sure that DEQ receives and files an NCR for every applicable violation. Some of your facility's NCRs are already on file, but some are not.

A file review of the above referenced Permit determined your facility reported the following effluent violations of Part I, Section A of your Permit:

Monitoring Period End Date	Dsch#	Parameter	Reported DMR Value	Limit Value	Vio %	NCR Received?
02/28/2021	001-A	Flow, in conduit or thru treatment plant (DAILY MX, MGD)	1.11	.95	17%	YES
08/31/2021	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	2001	400	400%	YES
06/30/2022	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	2000	400	400%	YES
09/30/2022	001-A	Solids, total suspended (7 DA AVG, mg/L)	33.6	22.5	49%	YES
11/30/2022	001-A	Solids, total suspended (7 DA AVG, mg/L)	28.4	22.5	26%	NO
01/31/2023	001-A	Solids, total suspended (7 DA AVG, mg/L)	25.1	22.5	12%	YES
02/28/2023	001-A	Flow, in conduit or thru treatment plant (DAILY MX, MGD)	1.165	.95	23%	YES
06/30/2023	001-A	Flow, in conduit or thru treatment plant (DAILY MX, MGD)	1.49	.95	57%	NO
07/31/2023	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	2000	400	400%	NO
10/31/2023	001-A	Flow, in conduit or thru treatment plant (DAILY MX, MGD)	1.065	.95	12%	NO
01/31/2024	001-A	Flow, in conduit or thru treatment plant (DAILY MX, MGD)	1.361	.95	43%	NO
01/31/2024	001-A	Sulfate (MO AVG, lb/d)	647.67	480	35%	NO
03/31/2024	001-A	Sulfate (MO AVG, lb/d)	514.02	480	7%	NO

04/30/2024	001-A	Flow, in conduit or thru treatment plant (DAILY MX, MGD)	1.01	.95	6%	NO
05/31/2024	001-A	Sulfate (MO AVG, lb/d)	493.59	480	3%	NO

Your Permit requires a Non-Compliance Report (NCR) be submitted for any violation of Permit parameters. For a NCR to be considered adequate, it must contain all of the following:

- (1) a description of the violations,
- (2) the reason for the violations,
- (3) the duration of the violations,
- (4) the corrective action being taken to eliminate the violations,
- (5) the compliance date or expected compliance date,
- (6) an original signature of the cognizant official.

Please submit an adequate NCR addressing the effluent violations. A separate NCR must be submitted for each of the following Monitoring Period End Dates:

- November 2022 – TSS violation
- June 2023 – Flow violation
- July 2023 – Fecal coliform violation
- October 2023 – Flow violation
- January 2024 – Flow violation (1), Sulfate violation (1)
- March 2024 – Sulfate violation
- April 2024 – Flow violation
- May 2024 – Sulfate violation

I am willing to extend the deadline for these NCRs because of our communications. These documents should reach the Division by **July 7, 2024**. You may email them to me or send them by mail.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0647 you may e-mail me at kayla.grabinski@arkansas.gov.

Respectfully,

Kayla Grabinski | Compliance Analyst
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Enforcement Branch
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From: TWU-Key, Sandra <Sandra.Key@txkusa.org>
Sent: Monday, June 24, 2024 1:50 PM
To: Kayla L. Grabinski <kayla.grabinski@arkansas.gov>

Cc: TWU-Crittenden, Donnie <Crittenden@txkusa.org>; TWU-Smith, Gary <gsmith@txkusa.org>

Subject: NCR and CAP Request - Texarkana, City Of-North WWTP (AR0048691)

Hello. I was forwarded your email for Non-Compliance Reports to be completed.

I had a question on periods ending 5/31/2023, and 9/30/2023. I show to have no errors on those reports. Can you tell me what I am missing?

I have attached the forms on the additional months you have requested.

Thank you for your help.

Sandra Key

PC Administrator

903-798-3501

