



# ETC Engineers & Architects, Inc.

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March 14, 2019

Mr. Layne Pemberton  
Enforcement Analyst  
Enforcement Branch  
ADEQ Office of Water Quality  
5301 Northshore Drive  
North Little Rock, AR 72118

Ref: City of Forrest City; Permit No.: AR0020087  
CAP for Effluent violations

Dear Mr. Pemberton,

Consent Administrative Order (CAO) that was signed by the City of Forrest City listed 6 effluent violations and instructed the Forrest City Water Utility (FCWU) to develop a Corrective Action Plan (CAP) and to submit the plan to the ADEQ by January 9<sup>th</sup>, 2018. A CAP was developed and submitted to the ADEQ on January 17, 2018. The CAP included explanation for the effluent violations and proposed a plan to rectify the related issues. In all cases the violations were caused by isolated operational issues resulting from either weather related event or preventive maintenance. Since those violations, the City has completed various capital improvement projects in the treatment facility and developed comprehensive preventive maintenance measures to control effluent violations.

A review of the most recent DMR data indicate that there has been no effluent violation in almost a year. A summary of the DMR data is attached to this letter for your file. In light of the findings, I request that the effluent violation be considered as corrected and that these items were completed to the satisfaction of ADEQ requirements.

Sincerely,

  
Mizan Rahman, P.E.  
Principal



CC: Mayor Cedric Williams, City of Forrest City  
Mr. Calvin Murdock, Manager, Forrest City Water Utility

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## CITY OF FORREST CITY - DMR DATA

| PARAMETERS                                       | Limit Value | 5/31/18 | 6/30/18 | 7/31/18 | 8/31/18 | 9/30/18 | 10/31/18 | 11/30/18 | 12/31/18 | 1/31/18 | AVERAGE |
|--|-------------|---------|---------|---------|---------|---------|----------|----------|----------|---------|---------|
| Solids, total suspended (MO AVG, lb/d)           | 353.60      | 162.10  | 103.50  | 68.30   | 41.20   | 74.00   | 66.10    | 45.20    | 67.50    | 120.50  | 83.16   |
| Solids, total suspended (MO AVG, mg/L)           | 20.00       | 9.10    | 6.80    | 4.80    | 2.90    | 4.70    | 4.20     | 2.80     | 4.00     | 6.30    | 5.07    |
| Solids, total suspended (7 DA AVG, mg/L)         | 30.00       | 21.00   | 10.30   | 7.30    | 4.00    | 7.30    | 8.00     | 3.70     | 8.50     | 11.00   | 9.01    |
| Nitrogen, ammonia total [as N] (MO AVG, lb/d)    | 37.00       | 0.50    | 0.30    | 2.80    | 0.20    | 1.00    | 1.00     | 0.30     | 0.90     | 0.80    | 0.87    |
| Nitrogen, ammonia total [as N] (MO AVG, mg/L)    | 2.10        | 83.16   | 0.02    | 0.19    | 0.02    | 0.06    | 0.07     | 0.02     | 0.06     | 0.04    | 9.29    |
| Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)  | 4.50        | 0.07    | 0.05    | 0.44    | 0.03    | 0.17    | 0.26     | 0.02     | 0.14     | 0.05    | 0.14    |
| Phosphorus, total [as P] (MO AVG, mg/L)          | Report      | 2.90    | 3.40    | 3.00    | 2.00    | 2.60    | 3.10     | 3.60     | 6.70     | 4.00    | 3.48    |
| Phosphorus, total [as P] (7 DA AVG, mg/L)        | Report      | 2.90    | 3.40    | 3.00    | 2.00    | 2.60    | 3.10     | 3.60     | 6.70     | 4.00    | 3.48    |
| Coliform, fecal general (30DA GEO, #/100ml)      | 1000        | 3       | 14      | 111     | 105     | 42      | 16       | 22       | 18       | 12      | 38.11   |
| Coliform, fecal general (7 DA GEO, #/100ml)      | 2000        | 4       | 46      | 562     | 326     | 180     | 152      | 32       | 330      | 100     | 192.44  |
| BOD, carbonaceous [5 day, 20 C] (MO AVG, lb/d)   | 229.90      | 86.20   | 62.40   | 54.30   | 53.60   | 61.10   | 63.60    | 56.60    | 73.90    | 73.90   | 65.07   |
| BOD, carbonaceous [5 day, 20 C] (MO AVG, mg/L)   | 13.00       | 5.00    | 4.00    | 4.00    | 4.00    | 4.00    | 4.00     | 4.00     | 4.00     | 4.00    | 4.11    |
| BOD, carbonaceous [5 day, 20 C] (7 DA AVG, mg/L) | 19.50       | 8.70    | 6.50    | 4.50    | 4.70    | 4.70    | 4.80     | 4.10     | 7.00     | 3.90    | 5.43    |