

October 1, 2018

Tim Joyner, General Manager Cabot Water and WW Commission P.O. Box 1287 Cabot, AR 72023

RE: NPDES Permit Number AR0021661, AFIN 43-00059

Request for a Corrective Action Plan

Dear Mr. Joyner,

ADEQ has conducted a review of the certified Discharge Monitoring Reports (DMRs) submitted by the Cabot Water and WW Commission from April 2016 through September, 2018. The review revealed that five (5) violations of the permitted effluents have been reported. A detailed list of the violations is included with this letter. As a result of this review, ADEQ requests that the Cabot Water and WW Commission submit 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:
  - The cause(s) of the effluent violation(s).
  - Evaluation of the current permitted treatment system for compliance within the requirements of your permit.
  - The actions to be taken to correct, and prevent, the recurrence of the effluent violations.
  - A milestone schedule for compliance with the permit effluent limits, with a final date of compliance.
- Quarterly Progress Reports. These reports shall describe the progress made and the remaining items to be completed. Submission of Quarterly Reports shall be due on the 15<sup>th</sup> of the third month. Please begin submitting the quarterly reports to the ADEQ Water Division Enforcement Branch within sixty (60) calendar days of receipt of this letter. The reports may also be emailed to <a href="mailto:qavin.gray@adeq.state.ar.us">qavin.gray@adeq.state.ar.us</a>.
- A final report, stamped by a PE registered in the state of Arkansas, certifying compliance with the permit effluent limits upon completion of actions taken to correct, and prevent, the recurrence of the effluent violations.

Within thirty (30) calendar days of receipt of this letter, please submit the CAP to the ADEQ Water Division Enforcement Branch. The document may also be emailed to me at gavin.gray@adeq.state.ar.us.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0667 or at <a href="mailto:gavin.gray@adeq.state.ar.us">gavin.gray@adeq.state.ar.us</a>.

Sincerely,

Gavin Gray

Enforcement Analyst

Water Division, Enforcement Branch

Monitoring Period End Date	Dsch#	Parameter	Limit Value	DMR Value	% Vio
08/31/2018	001-A	Nitrogen, ammonia total [as N], MO AVG, mg/L	2.1	3.2	52%
08/31/2018	001-A	Nitrogen, ammonia total [as N], 7 DA AVG, mg/L	5.2	7.1	37%
07/31/2018	001-A	Nitrogen, ammonia total [as N], MO AVG, mg/L	2.1	3.4	62%
07/31/2018	001-A	Nitrogen, ammonia total [as N], 7 DA AVG, mg/L	5.2	6.8	31%
04/30/2016	001-A	Oxygen, dissolved [DO], INST MIN, mg/L	>=6.5	6.4	2%