

June 29, 2021

Mr. Gavin Gray
Enforcement Analyst
Office of Water Quality - Enforcement Branch
Arkansas Department of Energy and Environment
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: NPDES Permit No. AR0033723 - AFIN: 70-00341
Corrective Action Plan

Dear Mr. Gray:

On behalf of the City of El Dorado-South Plant, please consider this submittal the Corrective Action Plan (CAP) addressing the effluent excursions referenced in your letter dated June 4, 2021. In responding to your request for a voluntary CAP, the City of El Dorado notes that of the thirteen (13) permit exceedences listed, eleven (11) occurred in 2018-19 and since May 2019 only two permit excursions were documented.

Nevertheless, to assist development of the CAP I performed an inspection of the South Plant on June 10, 2021 to assess the likely cause(s) of permit excursions and identify potential corrective actions to prevent their recurrence. My finding is summarized as:

- The major treatment components (dissolved air flotation units) of the facility are well beyond their serviceable life; mechanical breakdowns are frequent and other operational difficulties associated with forty-plus year old equipment result in periodic treatment lapses.

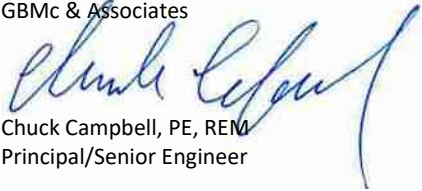
Recognizing the age of the South Plant equipment, the City of El Dorado proactively initiated measures to replace the treatment system in September, 2020 by authorizing the engineering design and specification of new process equipment to be constructed at the South Plant. Thus, the entirety of the CAP for the El Dorado South Plant is:

Complete the design and specification of a equipment and facilities to replace the existing DAF units built in 1978. Submit a construction permit application and obtain DEQ approval for the new components. Upon DEQ approval of permits and receipt of acceptable bids, begin construction to replace the aged equipment with an approved process that can comply with the effluent discharge limits.

Attached is a milestone schedule prepared by the design engineering firm. Please note that their preliminary target for final completion of the new construction is March 2024. As the City intends to invest millions of dollars to replace the aged treatment components, we hereby request consideration by DEQ to set the CAP compliance date no sooner than April 2024, subject to revision based on contracting conditions. In the interim, the City will continue to operate the existing system as efficiently as possible.

The City of El Dorado appreciates the opportunity to inform DEQ of the planned improvements. Please do not hesitate to contact Mr. John Peppers – General Manager, El Dorado Water Utilities at (870) 862-6451 (john@eldoradowater.com) or me at (501) 847-7077 if you have any questions or need additional information.

Respectfully submitted,
GBMc & Associates


Chuck Campbell, PE, REM
Principal/Senior Engineer

attach

cc: Robert Edmonds – City of El Dorado, Director of Public Works
John Peppers, Lorraine Murtha – El Dorado Water Utilities
Alan Perkins, Brian Ratcliff – PPGMR Law



Wastewater Treatment Plant Improvements

Kickoff Workshop

15% Project Schedule

Project Milestone	Scheduled Date
Design Phase	
15% Design Review Workshop	May 27, 2021
60% Design Complete	October 22, 2021
Submit Modification and Construction Permit Application to DEQ	November 19, 2021
90% Design Complete	January 28, 2022
100% Design Complete	March 25, 2022
QAQC Complete	April 22, 2022
Bidding & Construction Phase	
Open Bids	May 2022
Receive Construction Permit from DEQ	May 2022
Notice to Proceed Issued	July 2022
Substantial Completion	January 2024
Final Completion ¹	March 2024

¹Final construction schedule to be established in cooperation with the CMAR.