

El Dorado Water Utilities

500 NORTH WASHINGTON · P.O. BOX 1587 · EL DORADO, AR 71731 (870) 862-6451

December 22, 2015

Mr. Layne Pemberton
Enforcement Analyst
Water Division, Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, Arkansas 72118-5317

RE: Request for Information regarding Class IV Wastewater Operator NPDES Permit Numbers AR0049743, AFIN 72-00341, AR0033936, AFIN 70-01349 and AR0033723, AFIN 72-00341

Dear Mr. Pemberton,

Regarding the above referenced request for information, the Utility does not have any licensed Class IV Operators at this time. As you stated in your letter, the El Dorado Water Utilities experienced the unfortunate and sudden passing of its only Class IV wastewater operator in October of 2014. Mr. Harold Baker was a long time and valued employee of the Utility and as such he took with him great institutional knowledge and experience. He held the position of Water and Wastewater Treatment Plant Supervisor for 30 years which includes both wastewater treatment plants as well as four water treatment facilities. Subsequent to Mr. Baker's death, Mr. John Peppers (Class III Operator) was promoted into this position. Mr. Peppers had been with the Utility since 1987, working directly with Mr. Baker for 3 years, and is more than qualified for the position. The Utility fully acknowledges that Mr. Peppers experience in no way absolves it from the terms of the above referenced permits, however given his own knowledge, experience and longtime service to the Utility it was decided that his promotion was in the best interest of the Utility. It is also important to point out that this particular area of the state does not have an abundance of qualified applicants and recruitment of said applicants is often a long and arduous process. It is not unusual for the hiring process to exceed well over a year for more experienced personnel and therefore Mr. Pepper's promotion was most likely the most expedient means to providing a Class IV operator long term.

Mr. Peppers and the Utility are both aware of the need to obtain a Class IV operator with the utmost haste. However; Mr. Baker's unexpected passing put additional stress on the EDWU's already limited staff. As such, Mr. Peppers was tasked with not only learning his new responsibilities, but also with finding and training staff to fill his former position in order to maintain the everyday operations of both the water and wastewater treatment plants.

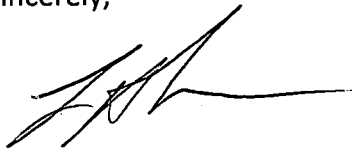
During the most recent ADEQ wastewater plant inspection, the lack of a Class IV Operator was noted by the inspector; however Mr. Peppers was assured by ADEQ staff that as long as he was working towards completing the requirements, that ADEQ staff would grant leniency.

Mr. Peppers has been studying on his own during over the past year and recently participated in a Class IV review and the most recent exam opportunity on December 2, 2015. While Mr. Peppers is an outstanding operator and knowledgeable of our particular system, he has no experience with waste activated sludge plants which comprises a large portion of the exam. Mr. Peppers did quite well considering, but unfortunately he was just short of passing.

There are four testing opportunities in 2016 and Mr. Peppers is currently signed up for the first available exam in March. The Utility is confident in Mr. Pepper's ability to pass the certification exam, however it is not unusual for individuals to require multiple attempts before passing. The El Dorado Water Utilities requests that the ADEQ allow Mr. Peppers the opportunity to take the exams scheduled in 2016 until such time as he passes before mandating further action on the part of the Utility to locate and hire an outside Class IV operator.

Please feel free to contact myself or Mark Smith, General Manager (870) 862-6451 with any questions or comments regarding this issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'L. Murtha', with a long horizontal line extending to the right.

Lorraine A. Murtha, P.E.

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