

Owned by the Citizens of Jonesboro

August 29, 2019

Enforcement Branch
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: NPDES permit AR0043401, AFIN 16-00936, Year Two Progress Report

To Whom It May Concern:

Please allow this letter to serve as the year two Progress Report for City Water and Light Plant of the City of Jonesboro (CWL) to the Arkansas Department of Environmental Quality (ADEQ). The purpose of this report is to address the progress towards attaining the final effluent limits for Total Residual Chlorine (TRC), Fecal Coliform Bacteria (FCB) and the *P. promelas* and *C. dubia* sub-lethal Whole Effluent Toxicity (WET) testing at Outfall 001 for National Pollutant Discharge Elimination System (NPDES) Permit number AR0043401 (permit).

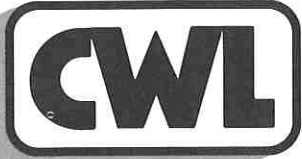
CWL has evaluated the continued use of chlorine gas for disinfection at the Eastside Wastewater Treatment plant (WWTP) while considering FCB limits. We believe there are other disinfection options that will meet the final TRC limit and produce consistent FCB results. The options CWL considered to replace chlorine and attain the final effluent TRC and FCB limits were Peracetic acid (PAA) and ultraviolet light (UV). After evaluating both options, CWL is moving forward with UV disinfection at the Eastside WWTP.

CWL is currently in the process of modifying the Eastside WWTP in accordance with the ADEQ issued construction permit (AR0043401C) and the plans and specifications received by ADEQ on November 30, 2017. This modification includes replacing the existing chlorine disinfection and dechlorination with UV disinfection. These modifications should allow CWL to attain compliance with the final effluent limits for TRC and FCB by September 1, 2020.

CWL has conducted eight WET test since the effective date of the permit. The results of this testing demonstrate compliance with the final *P. promelas* and *C. dubia* sub-lethal limits at the Eastside WWTP using its current processes. There is no indication that the modifications occurring at the Eastside WWTP will affect CWL's ability to attain compliance with the final effluent limit beginning on September 1, 2020. However, CWL will continue to monitor and evaluate the results of *P. promelas* and *C. dubia* sub-lethal testing

Jake Rice III, MANAGER

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throughout construction and for the duration of the Compliance Schedule to ensure the final permit limit is attained.

This should satisfy the requirements stated in CWL's NPDES Permit. If you have any questions or more information is required, please contact my office (870) 930-3310.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Jake Rice III', with a stylized flourish at the end.

Jake Rice III, P.E.
Manager

JR/je

Enclosure