

August 1, 2017

David R Anderson, Mayor City of Monticello PO Box 505 Monticello, AR 71655

RE: City of Monticello - East Plant Inspections (Drew Co) AFIN: 22-00379 NPDES Permit No.: AR0021831 ARR000000

Dear Mayor Anderson:

On May 10, 2017, I performed a Compliance Evaluation Inspection, an SSO/Collection System Inspection, and a Reconnaissance Inspection of the above-referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" section of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to <u>Water-Inspection-Report@adeq.state.ar.us</u>. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by <u>August 15, 2017</u>.

If I can be of any assistance, please contact me at <u>mccabe@adeq.state.ar.us</u> or (501) 682-0642.

Sincerely,

Kerri Mc Cale

Kerri McCabe Inspector Supervisor Office of Water Quality

cc: Charlie Hammock, WW Operator, City of Monticello, montcity@att.net

Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831

			WATER	DIVISION I	NSI	PEC	TION	I RE	PORT
		AF	IN: 22-00379 PE	ERMIT #: AR002	1831			DATE: 5	5/10/2017
Δ	R K A N S A S	CC	OUNTY: 22 Drew		PDS	#: 0983	363		MEDIA: WN
Dep	partment of Environmental Quality	GF	PS LAT: 33.66230	6 LONG: -91.758	3367	LOCAT	ION: EI	ntrance	•
	FACILITY INFORMAT	ION		IN	ISPEC	TION I	NFORM	MATION	1
	ay of Monticello - East Plant				_		State		
			ļ	1 - Municipal		22 S - S			
100	00 Florence Rd		ļ	FACILITY EVALUATION RATIN 2 - Marginal	IG:				Evaluation
	onticello, AR		ļ	(-)	NTRY TIME)8:00	: EXIT 11:			FECTIVE DATE:
	RESPONSIBLE OFFIC			5/10/2017 0	0.00		30	7/1/20	12 PIRATION DATE:
	E: / TITLE	<u> </u>		1				6/30/2	
	vid R Anderson / Mayor		ļ				* TED		
	PANY: ay of Monticello		ļ	FAYETTEVILLE	: SHAI	LE REL	AIED:	N	
			ļ	FAYETTEVILLE	SHAI	LE VIOI	LATION	NS: N	
) Box 505		1	IN	SPEC	TION P	PARTIC		S
- /			NAME/TITLE/PHONE/FAX/EMAIL/ETC.:						
	onticello AR 71655		ļ	Charlie Hammock (Lic #008032)/Class III/Advanced Industrial WW Operator/(870) 723-2898					
	NE & EXT: / FAX: 0-367-4400 / 870-367-4405		ļ		Opera	tor/(ö/	0) 123-	2898	
EMAIL			ļ	1					
mo	ontcity@att.net		ļ	1					
	ONTACTED DURING INSPECTION:	: Yes	S	1					
	(6.5	- tiefee		tisfactory, N=Not Applicable/Evaluated)					
S	PERMIT	S	FLOW MEASUR		S		RMWA	TFR	
M	RECORDS/REPORTS	**	LABORATORY		S				VIFW
S	OPERATION & MAINTENANCE	Ν		CEIVING WATER	-	-			G PROGRAM
**	SAMPLING	S		LING/DISPOSAL			TREAT		
**	OTHER:	. <u> </u>							
			SUMMARY O						
The	e following violations were noted	dur	ing the inspectic	on:					
1)	The permittee is reporting Daily	Max	on the DMR ins	tead of the 7-Da		rano (s	DMI مم	R Calci	lation

1.) The permittee is reporting Daily Max on the DMR instead of the 7-Day Average (see DMR Calculation Check). This is a violation of Part I, Section A of the permit. The permittee must review previously submitted DMR and make corrections as needed. Corrected DMR need to be identified as such and submitted to the Enforcement Branch.

2.) For March 9, March 10, March 11, and March 16 samples, BOD5 and TSS were collected as "grab" samples. This is a violation of Part I, Section A of the permit. The "sample type" for BOD5 and TSS is "composite." This appears to be corrected on the Aug 2016 COCs.

3.) For March 14 and March 15 samples, the "composite" sample is comprised of only three aliquots (see definition of "composite" in Part IV). This is a violation of Part I, Section A of the permit. This appears to be corrected on the Aug 2016 COCs.

4.) An instantaneous flow measurement is not being recorded on the COC when grab samples are collected (see definition of "grab" in Part IV). This is a violation of Part I, Section A of the permit.

5.) The city is not sampling the influent to demonstrate percent removal for BOD5. This is a violation of Part II, Condition #2 of the permit.

6.) An overflow of raw sewage at the Cash's lift Station was observed during the inspection. This overflow was not reported to the Department. This is a violation of Part II, Condition #5, B and C of the permit.

- 7.) The following items violate Part III, Section B, 1.A. of the permit:
 - There is one aerator down in Lagoon #1. This is a REPEAT violation from the March 2015 inspection.
 - Fire ants and other burrowing animals must be controlled to prevent levee damage.

8.) The DO probe for the multi-probe meter used by the operator is not being calibrated per the manufacture's manual. There is a standard that is to be utilized to conduct proper calibration of the DO probe. This is a violation of Part III, Section C, 3 of the permit.

9.) For March 9 and Aug 2 samples, there is no indication that NO3+NO2-N or TP were preserved with acid either onsite during collection or once received by the lab. For March 11 sample, the holding time for FCB was exceeded (> 8 hours) and the "Temperature on Receipt" was 12°C. For March 15 sample, the "Temperature on Receipt" was 7°C. For Aug 2 sample, the "Temperature on Receipt" was 7°C. This is a violation of Part III, Section C, 3 of the permit. Preservation with ice is to be ≤ 6 °C for BOD5, TSS, NO3 + NO2-N, and TP and ≤ 10 °C for FCB.

10.) Calibration records for the multi-probe meter used by the operator are not being kept. Specifically, a record of DO and pH calibration must be kept and made available upon request (see Part III, Section C, 8.A-F for details). This is a violation of Part III, Section C, 7 of the permit.

GENERAL COMMENTS

On Wed, May 10, 2017 an inspection was conducted with the above-mentioned inspection participants. Inspection consisted of a site assessment and a records review.

Site assessment:

The treatment system consists of preliminary (bar screens; two sizes: ³⁄₄" and 2"), primary/secondary influent flowmeter, two aerated lagoons (ran in parallel/series; four aerators each; Lagoon #2 with baffle installed; both with 4' concrete liner), two stabilization lagoons (ran in series), pump house for controlled irrigation/discharge, primary/secondary effluent flowmeter, and discharge to Outfall 001. The city has the option to irrigate treated wastewater via irrigation system and available agricultural fields. A secondary flowmeter (totalizer) is mounted upstream in the receiving stream to measure stream flow for hydrograph controlled release of effluent (primarily discharge from Nov-April). A baffle in Lagoon #4, chlorine building, and existing outfall structure (both East of Lagoon #4) mentioned in the completed permit renewal application do not exist.

Overall, lagoon levees are well-maintained and no issues were noted concerning levee integrity. The aerated lagoons do have weir boxes for bypassing to the receiving stream and to prevent catastrophic levee failure if freeboard is exceeded. There is one aerator down in Lagoon #1.

An unpermitted discharge from a sump with influent cited during the last inspection in March 2015 has been corrected. The line is capped and collected influent is pumped back to the headworks.

Records review:

Records were reviewed for March 2016 and Aug 2016. City is an intermittent discharger and can only discharge based on the flow of the receiving stream (hydrograph controlled release). Only minor issues were noted with paperwork. Temperature is being analyzed and it is not required by the current permit. This parameter either need to be reported with DMR or omitted from sampling/analyzing. For the March 11, March 15, and Aug 2 samples, the sample temperatures received by the lab were greater than 6°C and do not meet preservation for BOD, TSS, or FCB (March 11 only). The sample temperature needs to remain at $\leq 6^{\circ}C$ ($\leq 10^{\circ}C$ for FCB). The operator is inconsistent with supplying the time when samples are collected and the contract lab is left to assume the time is based on when field readings were analyzed or if written on sample containers. The operator needs to review the definitions of "composite" and "grab" in Part IV of the permit; however, issues concerning "grab" and "composite" appear to have been addressed in Aug 2016. The operator needs to maintain calibration records for the multi-probe utilized for DO and pH. Additionally, all records maintained by the operator should contain the required information outlined in Part III, Section C, 8.A-F of the permit (this includes the flow sheet).

The contract lab's COC and lab analysis sheets are well developed, thorough, and provide all required information.

Part I, Section A of the permit requires 7-Day Average. The permittee reported Daily Max for BOD for March 2016 and TSS for July 2016. The permittee will need to review all DMR for this discrepancy and submit corrected DMR to the Enforcement Branch. DMR checks for DO and pH indicate that these parameters are being reported correctly.

Kerri M'S Cale	
INSPECTOR'S SIGNATURE:Kerri McCabe	DATE: 7/26/2017
an Relation for	
SUPERVISOR'S SIGNATURE: Jason Bolenbaugh	DATE: 7/31/2017

Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS 🗆 🖾 🗆 U 🗆 NA 🗆 NE
DETAILS: Permit expires June 30, 2017; permittee has submitted a complete permit renew	al application.
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	🗹 y 🗆 n 🗆 na 🗆 ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	
4. ALL DISCHARGES ARE PERMITTED:	
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	⊡S ØM ⊡U ⊡NA ⊡NE
DETAILS: Operator measures flow (instream and effluent), DO, and pH; contract lab for ot	her parameters.
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: Daily Max is being recorded instead of 7-Day Avera	age. DY 🗹 N 🗆 NA 🗆 NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	OS 🗹 M 🛛 U 🖾 NA 🖾 NE
a. DATES AND TIME(S) OF SAMPLING: <u>Need "time" on flow sheet.</u>	
b. EXACT LOCATION(S) OF SAMPLING:	Øy 🛛 n 🗆 na 🗆 ne
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	🗹 y 🗆 n 🗆 na 🗆 ne
d. ANALYTICAL METHODS AND TECHNIQUES:	🗹 y 🗆 n 🗆 na 🗆 ne
e. RESULTS OF CALIBRATIONS: Operator not maintaining calibration records for multi-probe meter.	
f. RESULTS OF ANALYSES:	🗹 y 🗆 n 🗆 na 🗆 ne
g. DATES AND TIMES OF ANALYSES:	🗹 y 🗆 n 🗆 na 🗆 ne
h. NAME OF PERSON(S) PERFORMING ANALYSES:	Øy 🗆n 🗆na 🗆ne
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: <u>D0 probe not being calibrated</u> <u>correctly with standard.</u>	⊡s Øm ⊡u ⊡na ⊡ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	□s □m □u □na Øne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: <u>No loading requiremen</u> <u>Part I, Section A.</u>	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	ØS OM OU ONA ONE
DETAILS: Preliminary (bar screens), two aerated lagoons (ran in parallel/series), two stabi	<u>lization lagoons (ran in</u>
series), and discharge.	
1. TREATMENT UNITS PROPERLY OPERATED:	
2. TREATMENT UNITS PROPERLY MAINTAINED:	
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: <u>Not a mechanical plant.</u>	
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: Not a mechanical plant.	
5. ALL NEEDED TREATMENT UNITS IN SERVICE: <u>One aerator down.</u>	
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: <u>One Class III and one Class I</u>	
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
 PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: <u>Can isolate to Lagoon #1 and divert to Lagoon #2</u> HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: Lagoons 	#1 2
have weir boxes for levee protection; discharge of partially treated wastewater to receiving stream would be unpermitted.	
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	Dy Dn Øna Dne

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	□S ØM □U □NA □NE
DETAILS: Operator measures flow (instream and effluent), DO, and pH; contract lab for	other parameters.
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	🗹 y 🗆 n 🗆 na 🗆 ne
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	
 SAMPLE COLLECTION PROCEDURES ADEQUATE: For March 2016, collecting grab for composite sample; composite sa only three aliquots. 	
a. SAMPLES REFRIGERATED DURING COMPOSITING: <u>Refrigerator in in-house lab.</u>	
b. PROPER PRESERVATION TECHNIQUES USED: <u>NO3+NO2-N and TP not preserved with acid for March 9 and Aug 2; "Tel Receipt" exceeded.</u>	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
 IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR: <u>Temp is bei</u> <u>analyzed and not reported.</u> 	
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: Yes TYPE OF DEVICE: 8' rectan	^{gular weir} ⊠Y ⊡N ⊡NA ⊡NE
<u>w/o end contractions; mounted staff gauge</u> 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: <u>ISCO 3010</u> Ultrasonic Flow Transmitter (totalizer)	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: Last calibrated Jan 17, 2017.	
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	
9. HEAD MEASURED AT PROPER LOCATION:	
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS □M □U □NA □NE
DETAILS: Operator measures flow (instream and effluent), DO, and pH; contract lab for	other parameters.
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	
 SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: <u>Operator not calibrating DO p</u> properly. 	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: Arkansas Analytical, Inc.	
b. LAB ADDRESS: 8100 National Drive, Little Rock, AR 72209	
c. PARAMETERS PERFORMED: BOD5, TSS, FCB, TP, NO2+NO3-N, Total Recoverable Cu, and WET.	
8. BIOMONITORING PROCEDURES ADEQUATE:	
a. PROPER ORGANISMS USED:	
b. PROPER DILUTION SERIES FOLLOWED:	
c. PROPER TEST METHODS AND DURATION:	
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	

Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS								
BASED ON	VISUAL OBS			IU ⊠NA ⊡NE				
DETAILS:	No discharge d	luring inspectio	<u>n.</u>					
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER	
001	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	No Discharge	N/A	
						•		
SECTION H	: SLUDGE DIS	POSAL						
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆	IU 🗆 NA 🗆 NE	
DETAILS:	Sludge is retain	ned in lagoons.						
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m		
2. SLUDGE R	ECORDS MAINTAINED	DAS REQUIRED BY 40) CFR 503:			⊡s ⊡м	DU 🗹 NA DNE	
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE): N	<u>/A</u>		
SECTION I:	SAMPLING IN	SPECTION PRO	CEDURES					
SAMPLE F	RESULTS WITH		IU ⊠NA ⊡NE					
DETAILS:								
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	🗆 n 🗹 na 🗆 ne	
2. TYPE OF SAMPLE: GRAB: COMPOSITE: METHOD: FREQUENCY:								
3. SAMPLES PRESERVED:								
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				ΠY	□n Øna □ne	
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DEV	ICE:			ΠY	⊡n Øna ⊡ne	
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			ΠY	⊡n Øna ⊡ne	
7. SAMPLE S	PLIT WITH PERMITTE	Ξ:				ΠY	⊡n Øna ⊡ne	
8. CHAIN-OF-	CUSTODY PROCEDU	RES EMPLOYED:				ΠY	□n Øna □ne	
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			ΠY	□n Øna □ne	
	: STORM WAT		-					
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS		ØS 🗆 M 🗆	U DNA DNE	
DETAILS:	Part II, Conditio	on #6 requires E	BMPs for storm	water protection	<u>n; no issues note</u>			
1. SWPPP UF	DATED AS NEEDED:	_ DATE OF LAST UP	DATE:			ΠY	On Øna One	
2. SITE MAP	NCLUDING ALL DISCH	HARGES AND SURFAC	CE WATERS:			ΠY	□n Øna □ne	
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:				ΠY	□n Øna □ne	
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED	:			ΠY	□n Øna □ne	
5. LIST OF PO	DTENTIAL POLLUTAN	SOURCES:						
6. LIST OF PO	DTENTIAL SOURCES A	AND PAST SPILLS AND	D LEAKS:			ΠY		
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	IZED:			ΠY		
8. LIST OF ST	RUCTURAL BMPS:							
9. LIST OF NO	ON-STRUCTURAL BMF	PS:				ΠY	□n Øna □ne	
10. BMPS PRC	PERLY OPERATED AI	ND MAINTAINED:						
11. INSPECTIO	ONS CONDUCTED AS	REQUIRED:				ΠY		

DMR Calculation Check

Reporting Period:	From	2016 Year	03 Month	01 Day	_ To _	2016 Year	03 Month	<u>31</u> Day
Parameter Checked:		BOD5	-					
		Loading Mass				Concer (mg		
	Mo.	Avg Ibs/c	lay	Мо	o. Avg		7-Day A	Avg.
Reported Value:		N/A			9.08		12.6	0
Calculated Value:		N/A			<mark>10.0</mark>		<mark>12.3</mark>	<u>}</u>
Permit Value:		N/A			30.0		45.0)

If calculated value does not equal reported value, explain:

 $\frac{(8.2 + 6.36 + 8.44)/3}{(8.2 + 6.36 + 8.44)/3} = \frac{23}{3} = \frac{7.67 \text{ mg/l}}{1000}$

<u>(13.8 + 10.4 + 12.6)/3 = 36.8/3 = 12.27 mg/l</u>

<u>(23 + 36.8)/6 = 59.8/6 = <mark>9.97</mark> mg/l</u>

Values are not the same for 7-Day Average; the highest concentration of all six samples for the month (Daily Max) is being recorded for the 7-Day Average and this is NOT correct. All three samples for the week are to be added together and divided by the total number of samples in the week (i.e., three). The week with the highest concentration is to be recorded. The permit does not require the reporting of Daily Max for concentration (see Part I, Section A and the definitions for "Monthly Average," "7-Day Average," and "Daily Max" in Part IV).

DMR Calculation Check

Reporting Period:	From	2016 Year	07 Month	01 Day	_ To _	2016 Year	07 Month	<u>31</u> Day
Parameter Checked:		TSS	-					
		Loading Mass				Concen (mg		
	Mo.	Avg Ibs/c	lay	Мс	o. Avg		7-Day /	Avg.
Reported Value:		N/A		1	8.20		22.5	0
Calculated Value:		N/A			18.2		<mark>21.5</mark>	5
Permit Value:		N/A			90.0		135.	0

If calculated value does not equal reported value, explain:

(15.5 + 14.0 + 18.5)/3 = 48/3 = 16 mg/l

(20.5 + 22.5)/2 = 43/2 = 21.5 mg/l

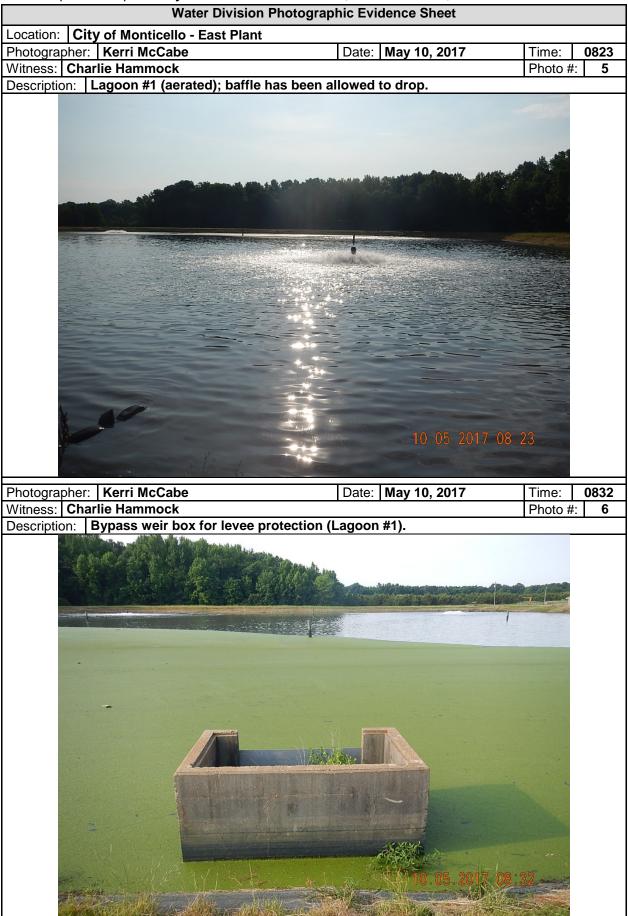
<u>(48 + 43)/5 = 91/5 = <mark>18.2</mark> mg/l</u>

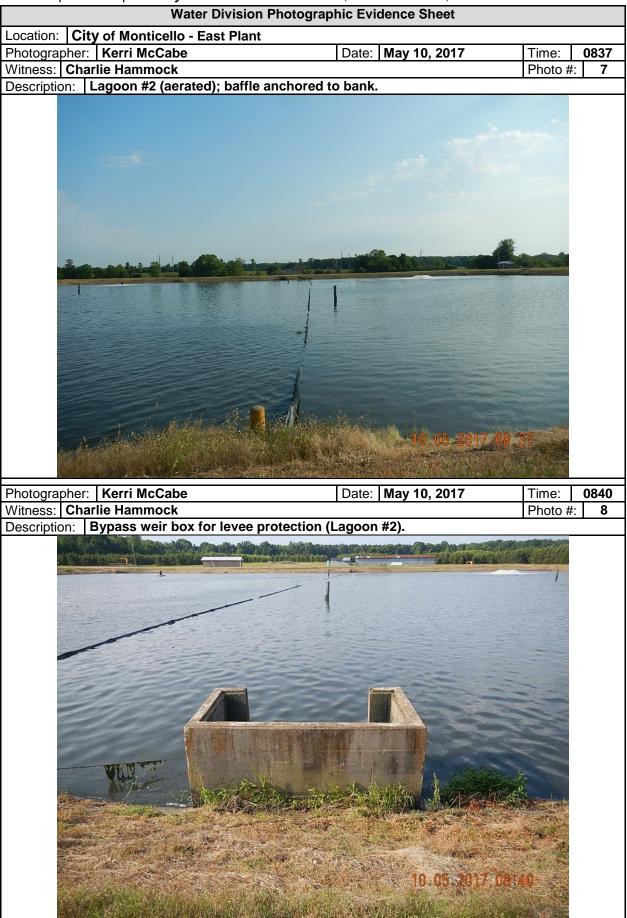
Values are not the same for 7-Day Average; the highest concentration of all six samples for the month (Daily Max) is being recorded for the 7-Day Average and this is NOT correct. All three samples for the week are to be added together and divided by the total number of samples in the week (i.e., three). The week with the highest concentration is to be recorded. The permit does not require the reporting of Daily Max for concentration (see Part I, Section A and the definitions for "Monthly Average," "7-Day Average," and "Daily Max" in Part IV).

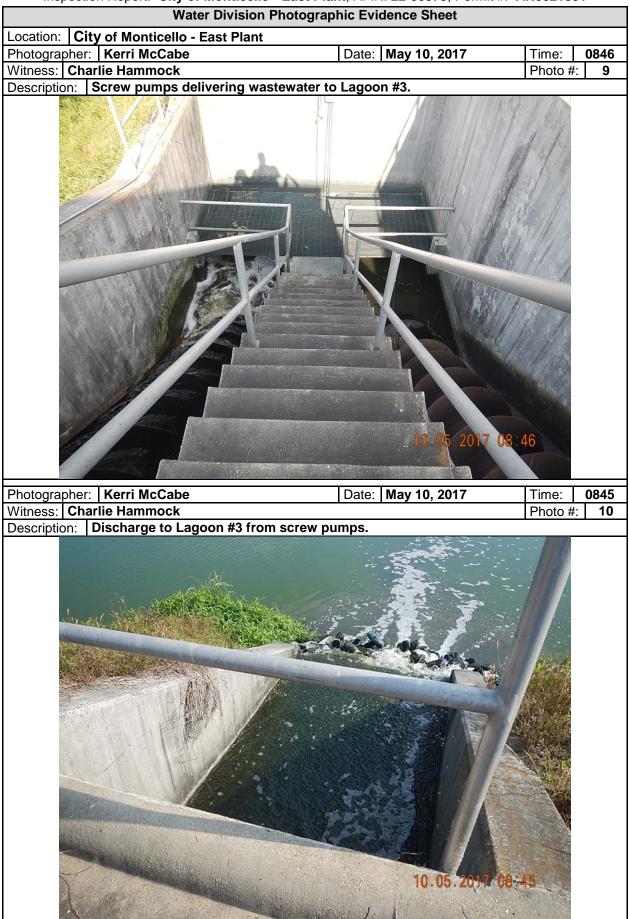


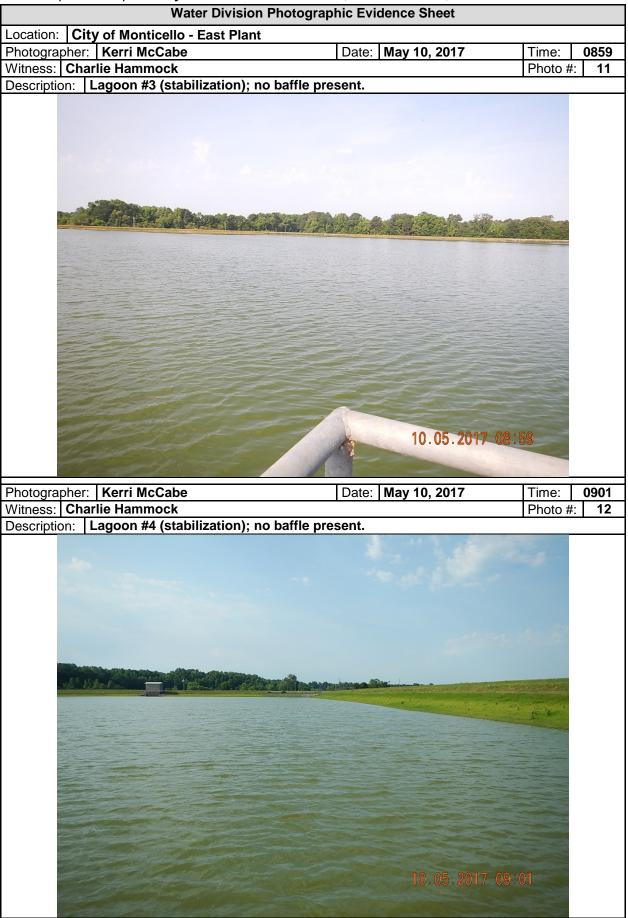
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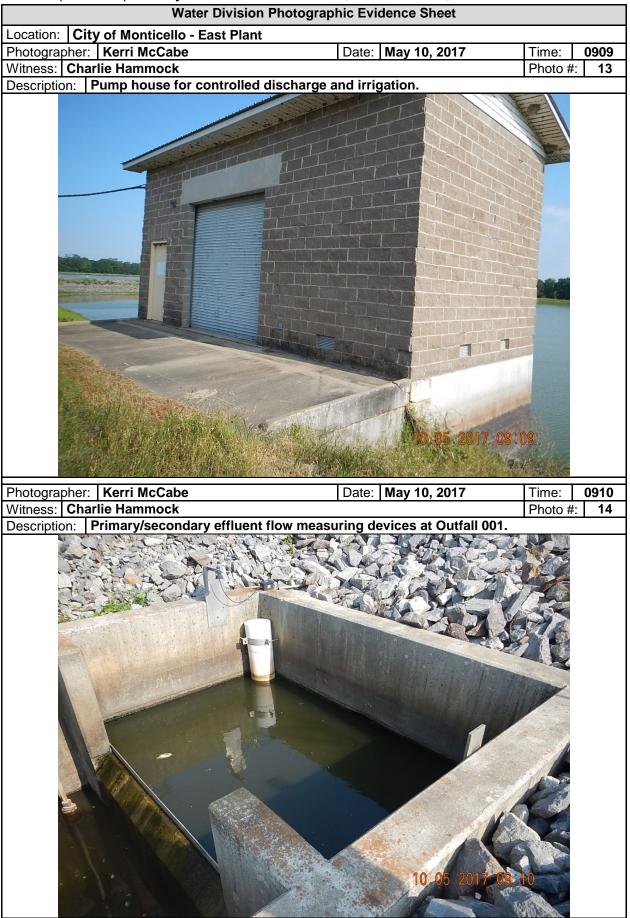


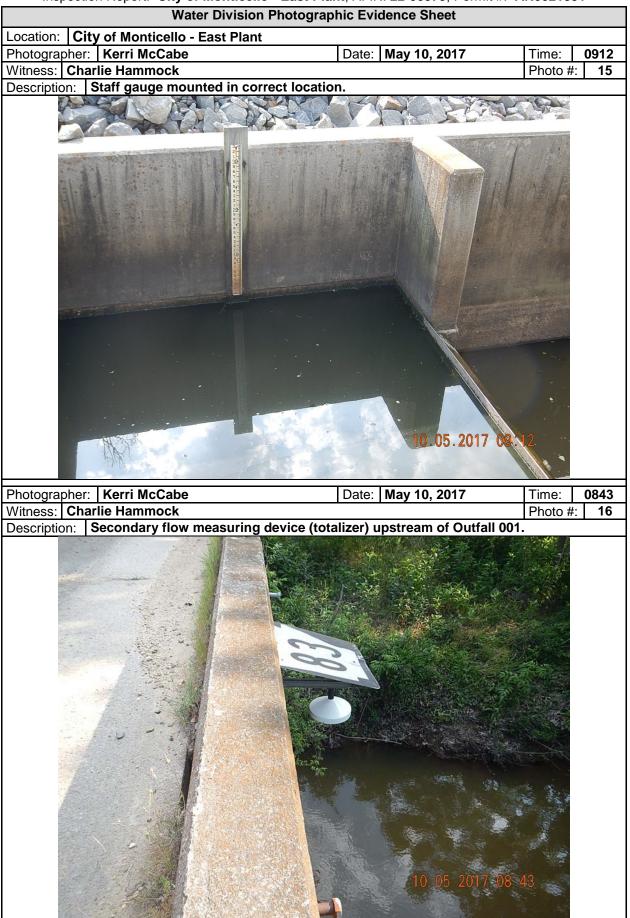


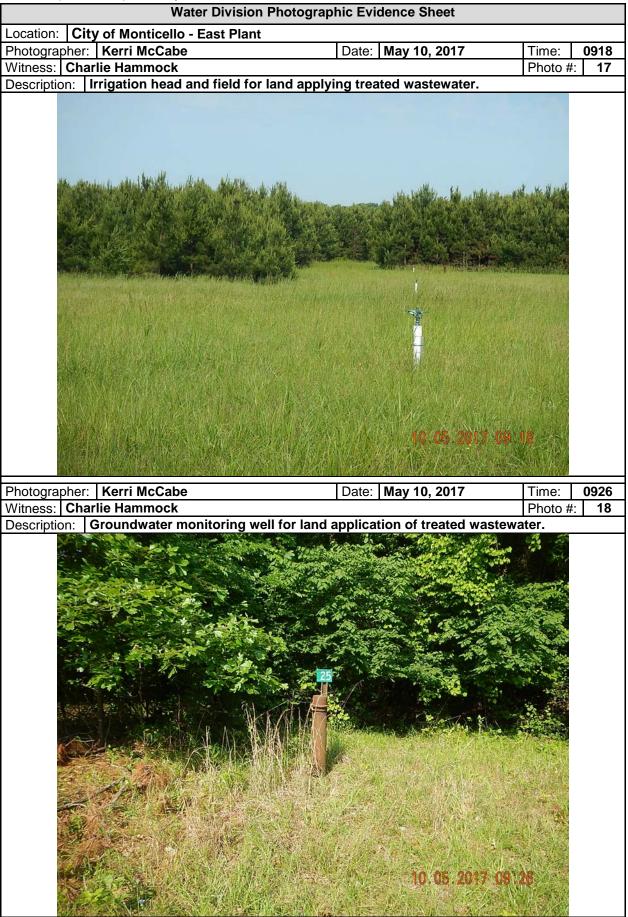




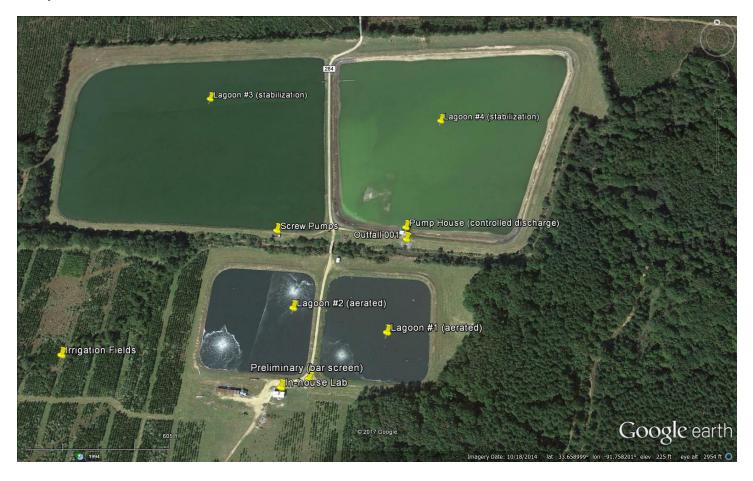








Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831 Figure 1. Google earth image dated Oct 18, 2014 depicting the Monticello East Plant with major components identified.



From:	McCabe, Kerri
To:	McConnell, Melissa
Subject:	FW: Response to Inspection Report - Monticello East Plant; AR0021831
Date:	Monday, September 25, 2017 7:34:22 AM
Attachments:	Response to Inspection Report 20170915.pdf
	image001.png

Melissa,

Please attach this email and attachment to WIDs 22764, 22765, and 22766. Thank you.

Kerri McCabe

Inspector Supervisor ADEQ – Water Division Field Services – Inspection Branch

Office – (501) 682-0642 Work Cell – (501) 352-5641 Fax – (501) 682-0880 5301 Northshore Drive North Little Rock, AR 72118-5317



From: Mizan Rahman [mailto:mizanr@etcengineersinc.com]
Sent: Thursday, September 21, 2017 4:00 PM
To: McCabe, Kerri; City of Monticello
Cc: Mizan Rahman
Subject: Response to Inspection Report - Monticello East Plant; AR0021831

Attached please find City of Monticello's response to your Compliance Evaluation Inspection dated May 10, 2017. The original is being mailed to you. Please let me know if you have any questions or need additional documentations.

Regards, *Mizan*

Mizan Rahman, P.E. ETC Engineers & Architects, Inc. 1510 Broadway Little Rock, AR 72202 501-375-1786 501-580-5495 (c) <u>mizanr@etcengineersinc.com</u>

ETC Engineers & Architects, Inc.

ENGINEERS = ARCHITECTS = PLANNERS

= 1510 SOUTH BROADWAY, LITTLE ROCK, AR 72202 = PHONE 501-375-1786 = FAX 501-375-1277 =

September 15, 2017

Kerri McCabe Inspector Supervisor Office of Water Quality ADEQ 5301 Northshore Drive North Little Rock, AR 72118

Re: City of Monticello – East Plant Inspection Report NPDES Permit # AR0021831

Dear Ms. McCabe,

On behalf of the City of Monticello and Mayor Anderson, I am hereby responding to the comments you articulated in your letter August 1, 2017. The comments were the result of your May 10, 2017 Compliance Evaluation Inspection and Collection System Inspection. The responses to your findings are as follows:

COMPLIANCE EVALUATION:

Finding #1: The permittee is reporting Daily Max on the DMR instead of the 7-Day Average (see DMR Calculation Check). This is a violation of Part I, Section A of the permit. The permittee must review previously submitted DMR and make corrections as needed. Corrected DMR need to be identified as such and submitted to the Enforcement Branch.

Response: Corrected DMR's have been prepared for the following periods:

- March 2016
- August 2016
- January 2017
- May 2017
- June 2017

The corrected DMR's are stamped "Corrected Copy". Some include non-compliance report. These reports are included as attachments to this letter. Signed "Corrected DMR's will be submitted formally to the Enforcement Branch.

BUILDING A BETTER WORLD





Finding #2: For March 9, March 10, March 11, and March 16 samples, BOD5 and TSS were collected as "grab" samples. This is a violation of Part I, Section A of the permit. The "sample for BOD5 and TSS is "composite." This appears to be corrected on the Aug 2016 COCs.

Response: This happened during the transition period when current lab took over the sampling and testing responsibilities after the old lab failed to perform the tasks. This was due mostly to miscommunication between the new lab and the City staff. This has been corrected since then.

Finding #3: For March 14 and March 15 samples, the "composite" sample is comprised of only three aliquots (see definition of "composite" in Part IV). This is a violation of Part I, Section A the permit. This appears to be corrected on the Aug 2016 COCs.

Response: This has been corrected.

Finding #4: An instantaneous flow measurement is not being recorded on the COC when grab samples are collected (see definition of "grab" in Part IV). This is a violation of Part I, Section A of the permit.

Response: The City plant operator is now following appropriate sampling protocol.

Finding #5: The city is not sampling the influent to demonstrate percent removal for BOD5. This is a violation of Part II, Condition #2 of the permit.

Response: City staff will start collecting samples at the influent and the lab has been instructed to conduct necessary test to determine BOD5 efficiency.

Finding #6: An overflow of raw sewage at the Cash's lift Station was observed during the inspection. This overflow was not reported to the Department. This is a violation of Part II, Condition #5, B and C of the permit.

Response: Overflow was caused by a pump failure. The pump was repaired the next day and has been working since then.

Finding #7: The following items violate Part III, Section B, 1.A. of the permit:

a. There is one aerator down in Lagoon #1. This is a REPEAT violation from the March 2015 inspection.

Response: The aerator was repaired immediately after the first violation and has continued to perform as designed. It broke down again and has been repaired since this inspection. Aerator failures are generally caused by motor failure. When an aerator fails, the entire assembly has to be shipped to an off-site facility (in this case

it was shipped to Monroe, LA). After the motor gets repaired the assembly is shipped back. This process may take as long as a month. However the facility is equipped with 8 aerators and as such the absence of one aerator does not significantly impact the overall performance.

b. Fire ants and other burrowing animals must be controlled to prevent levee damage.

Response: City's plant operator has been instructed to initiate appropriate measure to remove fire ants and burrowing animals from causing any damage to the levee.

Finding #8: The DO probe for the multi-probe meter used by the operator is not being calibrated per the manufacture's manual. There is a standard that is to be utilized to conduct proper calibration of the DO probe. This is a violation of Part III, Section C, 3 of the permit.

Response: City's plant operator has been instructed to follow manufacturer's standard procedure to calibrate the probes and maintain proper records documenting history of calibration. The operator will follow manufacturer's recommended procedure for calibration of all probes.

Finding #9: For March 9 and Aug 2 samples, there is no indication that N03+N02-N or TP were preserved with acid either onsite during collection or once received, by the lab. For March 11 sample, the holding time for FCB was exceeded (> 8 hours) and the "Temperature on Receipt" was 12°C. For March 15 sample, the "Temperature on Receipt" was 7°C. For Aug 2 sample, the "Temperature on Receipt" was 7°C. This is a violation of Part III, Section C, 3 of the permit. Preservation with ice is to be S 6°C for BOD5, TSS, N03 + N02-N, and TP and S 10°C for FCB.

Response: Samples collected and received the same day with evidence of preservation attempt are not required to be less than or equal to 6-degree C as per CFR Vol. 77, No. 97, Friday, May 18, 2012. Table II. Required containers, Preservation techniques, and Holding Times, Footnote 16. Transition COC did not properly reflect actual preservation which was HNO3 for P, an unpreserved Aliquot for NO#+NO2 was used (analysis by ion chromatography). Sample for fecal was received out of holding time.

Finding #10: Calibration records for the multi-probe meter used by the operator are not being kept. Specifically, a record of DO and pH calibration must be kept and made available upon request (see Part III, Section C, 8.A-F for details). This is a violation of Part III, Section C, 7 of the permit.

<u>Response</u>: Plant operator has been instructed to maintain historical calibration records for all probes and be able to present those to ADEQ staff whenever such request is made.

RECONNAISSANCE:

Finding #11: City should apply for No-Exposure Certification.

Response: City of Monticello has decided to complete the No Exposure Certification form and submit for its approval. It intends to complete the forms in the next 30 days

SSO/COLLECTION SYSTEM:

Finding #9: There are no onsite generators located at the lift stations nor are there any hookups available at the lift stations for a portable generator.

Response: We concur that during a power failure individual pump stations are inoperable for lack of permanently connected on-site generator or having an available hook-up to connect to a portable generator. It is our intention to develop a plan to eliminate this condition at all lift stations within the next 60 days.

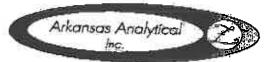
Please feel free to get in touch with me if you need additional clarification.

Sincerely,

Sr. Engineer/Principle

CC: Mayor David Anderson, City of Monticello

375- 1277 21 pages follow



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8100 National Drive Little Rock, AR 72209 501-455-3233

August 24th, 2017

Mizan Rahman, P.E. ETC Engineers & Architects, Inc. 1510 Broadway Little Rock, AR 72202

Re: Monticello East Plant Inspection

Dear Mizan,

We have evaluated the water division inspection report from ADEQ associated with the City of Monficello- East Plant as of 5/10/17 and have the following comments:

Finding #1: Corrected DMRs have been prepared for the following monitoring periods: March, 2016; August, 2016; January, 2017; May, 2017; and June, 2017. Each is stamped as "corrected copy". Some include noncompliance report. These are attached. Lab will send to permittee for signature and submission.

Finding #2: miscommunication during laboratory transition phase resulted in incorrect sample type. Correction has been made.

Finding #3: permittee instructed lab to prepare composite from only three aliquots.

Finding #4: not the laboratory responsibility, permittee collects samples

Finding #5: lab will supply containers to permittee

Findings #6, 7, 8, 10: not the laboratory responsibility

Finding #9: Samples collected and received the same day with evidence of preservation attempt are not required to be less than or equal to 6 degrees C. as per CFR Vol. 77, No. 97, Friday, May 18, 2012. Table II-Required Containers, Preservation techniques, and Holding Times, Footnote 16.

Transition chain of custody did not properly reflect actual preservation which was HNO3 for P, an unpreserved aliquot for NO#+NO2 was used (analysis by ion chromatography). Sample for fecal was received out of holding time.

Let me know if you need anything further.

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Norma James President

Attachments

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NON-COMPLIANCE LETTER

DATE :_____

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY 5301 NORTH SHORE DRIVE NORTH LITTLE ROCK, AR 72118-5317 ATTN: ENFORCEMENT SECTION

RE: NPDES PERMIT NO: AR0021831

DISCHARGE NUMBER: 001-A

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CLIENT: MONTICELLO, CITY OF - EAST PLANT ADDRESS:1000 FLORENCE ROAD (CR80) CITY: MONTICELLO STATE: AR ZIP: 71639 PHONE: 352-2931 CONTACT: TAMMY KELLY, A/P COORDINATOR

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OLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMB)		AR0021831 0504017 #11.1005
NATIONÁL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DÍSCHARGE MONITORING REPORT (DMB)		AR0021631
	PERMITTEE NAME/ADDRESS (Include Facility Name/Location (f 2745-2021	NAME: MONTIGELLO, CITY OF - EAST PLANT ADDRESS: P.O. BOX 505

-

AR0021631 PERMIT NUMBER Facility: Monticello, Gity of - East Plant Location 1000 florence road (cr 80) Monticello, ar 71838 MONTICELLO, AR 71667

ATTN: CHARLLE HAMMOCK, SUPT,

10010

DISCHARGE NUMBER	MONITORING PERIOD	MM/DD/YYYY	08/31/2016
PERMIT NUMBER	MONITON	WM/DD/WW	08/01/2018

04/19 No. 2040-0004

Form Approved

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	SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT		i per day. Subrit tabular ovërflow report with dmr each month, see part 11, condition 5, (SSO). See Ation (84164) to report number of days/month and dschg excepted central 2, 300, 500, see	Altensae Analytical, The, Contraction (196), Contraction	Little Rock, AR 72205
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Page 2 09/12/2018

Automases Analysical, Inc. 5100 Wallorrat Br. Liftle Rock, AR 72205 501-466-3233

NON-COMPLIANCE LETTER

DATE :_____

9 F. F. W. W. 155

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY 5301 NORTH SHORE DRIVE NORTH LITTLE ROCK, AR 72118-5317 ATTN: ENFORCEMENT SECTION

RE: NFDES PERMIT NO: AR0021831

DISCHARGE NUMBER: 001-A

CLIENT: MONTICELLO, CITY OF - EAST PLANT ADDRESS:1000 FLORENCE ROAD (CR80) CITY: MONTICELLO STATE: AR ZIP: 71639 PHONE: 870-352-2931 CONTACT: CHARLIE HAMMOCK, SUPT.

DATE OFPARAMETERPERMITNON-COMPLIANCEEXCEEDEDCONCENTRATIONLOADINGLIMITS08/01-31/16DFD MAX52.152

WE FEEL THIS PROBLEM WAS DUE TO:

WE PLAN ON CORRECTING THE PROBLEM IN THIS MANNER:

TIME ESTIMATED THAT IT WILL TAKE:

YOURS TRULY,

AUTHORIZED SIGNATURE

Record (manual) Smpl. Type RE 🖣 Freq, of Analyals Continuous 88/68 A - 001-MONTHLY-TRTD MUNICIPAL WW ē # 0. 변文, 1 s., 1000 FLORENCE ROAD (CR 80) MONTICELLD, AR 71657 MONTICELLO, AR 71639 Chite mg/L Y P.O. BOX 505 01/25/17 Quality or Concentration Value 3 R. Permittee Address Facility Locations Value 2 **DMR Due Date:** Lost Nam<u>e</u>r Dischange Telephone: Major) و Value 1 Ready for Data Entry CONSECUES MGD Millon Galloris per Day From 12/01/16 to 12/31/16 16 68 68 Chick CERV MONITICELLO, CITY OF - EAST PLANT MONTICELLO, CITY OF - EAST PLANT Quantity or Londing 2.55 Req Mon Daily Maximum Value 2 F -001 - External Outfail Req Mun Monthily Average 0-9-9-0 Value 1 AR0021831 • F Smpl. NODE NODI Req. Smpl. Principal Executive Officer 1 No Data Indicator (NODJ) Report Dates & Status Stream flow, Instantaneous Monitoring Period: 5 - Upstream Monitoring Permitted Feature: Name Name 🛱 Edit DMR Oxygen, dissolved [DQ] Paraméter 1 - Efflagnt Gross Form NOD1: First Name: Reimitteer Rennit ID; -**Fadlity:** Pietro))(Status Season: 0 Ş 111111 Titler 00061 00300 ł

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NON-COMPLIANCE LETTER

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DATE:_____

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ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY 5301 NORTH SHORE DRIVE NORTH LITTLE ROCK, AR 72118-5317 ATTN: ENFORCEMENT SECTION RE: NPDES PERMIT NO: AR0021831 DISCHARGE NUMBER: 001-A CLIENT: MONTICELLO, CITY OF - EAST PLANT ADDRESS: 1000 FLORENCE ROAD (CR80) CITY: MONTICELLO STATE: AR ZIP: 71639 PHONE: 870-352-2931 CONTACT: CHARLIE HAMMOCK, SUPT. (91) DATE OF PARAMETER PERMIT NON-COMPLIANCE EXCERDED CONCENTRATION LOADING LIMITS 04/01-30/17 ANALYSIS NOT CONDUCTED THIS MONITORING PERIOD N+N PHOS ANALYSIS NOT CONDUCTED THIS MONITORING PERIOD WE FEEL THIS PROBLEM WAS DUE TO: ANALYTICAL LAB DID NOT RECEIVE SAMPLE FOR ANALYSIS. WE PLAN ON CORRECTING THE PROBLEM IN THIS MANNER:

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TIME ESTIMATED THAT IT WILL TAKE:

YOURS TRULY,

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Attachments

NON-COMPLIANCE LETTER

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ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY 5301 NORTH SHORE DRIVE NORTH LITTLE ROCK, AR 72118-5317 ATTN: ENFORCEMENT SECTION

RE: NPDES PERMIT NO: AR0021831

DISCHARGE NUMBER: 001-A

7

CLIENT: MONTICELLO, CITY OF - EAST PLANT ADDRESS:1000 FLORENCE ROAD (CR80) CITY: MONTICELLO STATE: AR ZIP: 71639 PHONE: 870-352-2931 CONTACT: CHARLIE HAMMOCK, SUPT.

date of Non-compliance	PARAMETER EXCERDED	CONCENTRATION	LOADING	Permit Limits
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WE FEEL THIS PROBLEM WAS DUE TO:

WE PLAN ON CORRECTING THE PROBLEM IN THIS MANNER:

TIME ESTIMATED THAT IT WILL TAKE:

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YOURS TRULY,

AUTHORIZED SIGNATURE

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NON-COMPLIANCE LETTER

DATE :_____

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY 5301 NORTH SHORE DRIVE NORTH LITTLE ROCK, AR 72118-5317 ATTN: ENFORCEMENT SECTION

RE: NPDES PERMIT NO: AR0021831

DISCHARGE NUMBER: 001-A

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CLIENT: MONTICELLO, CITY OF - EAST PLANT ADDRESS:1000 FLORENCE ROAD (CR80) CITY: MONTICELLO STATE: AR ZIP: 71639 PHONE: 870-352-2931 CONTACT: CHARLIE HAMMOCK, SUPT.

DATE OF NON-COMPLIANCE	PARAMETER EXCERDED	CONCENTRATION	LOADING	Permit Limits
06/01-30/17	DF% STREAM F.C 30DA GEO F.C 7 DA GEO	52.4 15121 24200		52 1000 2000

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WE FEEL THIS PROBLEM WAS DUE TO:

WE PLAN ON CORRECTING THE PROBLEM IN THIS MANNER:

TIME ESTIMATED THAT IT WILL TAKE:

YOURS TRULY,

AUTHORIZED SIGNATURE





October 4, 2017

David R Anderson, Mayor City of Monticello PO Box 505 Monticello, AR 71655

RE: City of Monticello - East Plant Response to Inspections (Drew Co) AFIN: 22-00379 NPDES Permit No.: AR0021831 ARR000000

Dear Mayor Anderson:

I have reviewed the response pertaining to my May 10, 2017 inspections of the city's WWTP and collection system. However, the information provided does not sufficiently addresses the violations referenced in my inspection reports.

<u> AR0021831 – WWTP</u>

The responses for all the cited violations were adequately addressed for this portion of the inspection report. To clarify, for Violation #6, please refer to Part II, Condition 5, A-C of the permit regarding reporting of SSO. The city's response does not acknowledge that reporting is required or will be conducted for future instances. No further response is required.

AR0021831 – Collection System

The city's consulting firm indicates that a contingency plan for power failures within the collection system will be formulated within the next 60 days. **Please provide an update for the contingency plan for power failures within the collection system.** This contingency plan can be a simple outline specifying how the city will respond to a power failure and any subsequent sanitary sewer overflows resulting from such power failures.

ARR000000 – No-Exposure (IGP)

The response provided indicates that the No-Exposure Exclusion certification will be submitted to the Department within 30 days; however, a review of available records could not locate an active or pending Industrial Stormwater General Permit (IGP) for the City of Monticello East Plant. Please submit the No-Exposure Exclusion certification to the Permits Branch or provide the permit tracking number (e.g., ARR00XXXX) that was assigned to the facility.

This documentation should be completed and submitted as soon as possible. Please provide the additional information no later than <u>October 18, 2017</u>.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at (501) 682-0642 or you may e-mail me at mccabe@adeq.state.ar.us.

Sincerely,

Kerri M' Cale

Kerri McCabe Inspector Supervisor Office of Water Quality

cc: Mizan Rahman, PE, ETC Engineers & Architects, Inc., <u>mizanr@etcengineersinc.com</u>