A D F WATER				DIVISION INSPECTION REPORT				
	ADLQ	AF	IN: 22-00379 P	ERMIT #: AR002 1	831		DATE: 5	5/10/2017
Δ	RKANSAS	CC	OUNTY: 22 Drew		PDS #	#: 098364		MEDIA: WN
Dep	partment of Environmental Quality	GP	S LAT: LO	ONG: LOC	ATION	l: N/A		
	FACILITY INFORMAT	ION		INSPECTION INFORMATION				
	e: ty of Monticello - East Plant Collect ktion:	ction	n System	FACILITY TYPE: 1 - Municipal		2 S - State		
	00 Florence Rd			facility evaluation ration 2 - Marginal		SSO	Collecti	ion System
Мо	onticello, AR			(-)	TRY TIME: 8:00	EXIT TIME: 11:30		FECTIVE DATE:
	RESPONSIBLE OFFIC	CIAL	•	0/10/2017	0.00	11.00	7/1/20 PERMIT EX	PIRATION DATE:
	E: / TITLE vid R Anderson / Mayor						6/30/2	2017
COMPANY:			FAYETTEVILLE SHALE RELATED: N					
City of Monticello			FAYETTEVILLE SHALE VIOLATIONS: N					
	ING ADDRESS: D Box 505			INSPECTION PARTICIPANTS				
CITY, STATE, ZIP: Monticello AR 71655 PHONE & EXT: / FAX: 870-367-4400 / 870-367-4405				NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Charlie Hammock (Lic #008032)/Class III/Advanced Industrial WW Operator/(870) 723-2898				
mc	ontcity@att.net							
CC	NTACTED DURING INSPECTION:	Yes	5					
	(\$=\$:	atisfac	AREA EVA	LUATIONS isfactory, N=Not Applicable	/Evaluated)		
**	PERMIT	**	FLOW MEASUR		**	STORMW	ATER	
**	RECORDS/REPORTS	**	LABORATORY		**	FACILITY	SITE RE	VIEW
**	OPERATION & MAINTENANCE	**	EFFLUENT/REC	CEIVING WATER	**			G PROGRAM
**	SAMPLING	**	SLUDGE HAND	LING/DISPOSAL	**	PRETREA	TMENT	
7	OTHER: SSO/Collection					·	·	·

SUMMARY OF FINDINGS

The following item is a violation of Part III, Section B, 1.A. of the permit and violations of APC&EC Regulation 6, which has adopted the "10 States Standards" (http://10statesstandards.com/wastewaterstandards.html#40):

There are no onsite generators located at the lift stations nor are there any hook-ups available at the lift stations for a portable generator. In response to this finding, the city must outline a contingency plan that would be utilized during a power failure at the lift stations.

GENERAL COMMENTS

On Wed, May 10, 2017 an inspection was conducted of the City of Monticello East Plant collection system.

The inspection consisted of an assessment of the system's lift stations and a record review of the reported SSO information.

The system consists of four (4) lift stations and one (1) satellite system (Grand Manor Monticello; Mike Akin; 870-723-3710). City is reporting conducting wet well cleaning periodically using Farmer's Septic Tank Service (Terry Farmer; 870-367-8339; Monticello). For electrical issues, Forrest Electrical Service (Jackie Forrest; 870-367-9319; Monticello) is used, and Pumps & Power (Little Rock) is used for pump and valve repairs. City is responsible for main lines (property line to main), manholes, and lift stations only; residents are responsible for service lines. The city does not have generators at lift stations and does not have hook-ups for a mobile generator. The some wet wells do have holding capacity (25-30' deep) and the city is on the Entergy's priority list during power failures. For reporting requirements, the operator acknowledges that threat to public health is an overflow at a residence and an overflow that reaches waters of the State is a threat to the environment.

Kerri Mª Caly	
INSPECTOR'S SIGNATURE:Kerri McCabe	DATE: 7/25/2017
SUPERVISOR'S SIGNATURE: Jason Bolenbaug	n DATE: 7/31/2017

inspection Report. City of Monticeno - East Plant, APIN. 22-00379, Permit #. AR0021031					
COLLECTION SYSTEM INSPECTION AND OVERALL RATING	□S ØM □U □NA □NE				
PROVIDE A BRIEF DESCRIPTION OF THE COLLECTION SYSTEM: Collection system consists of pressure (5%) and gravity (95%) lines with four lift station West collection system is 17 lift stations.	ons; combined East and				
POPULATION SERVED/NUMBER OF RESIDENTIAL (80%) AND COMMERCIAL (20%) CO	NNECTIONS: 4200				
FEET OF SEWER SYSTEM: Not evaluated.					
AGE OF SYSTEM: 30-35 years					
DOES THE SYSTEM EXPERIENCE PROBLEMS DURING DRY OR <u>WET</u> WEATHER (EXPLAIN): <u>I&I during rain events.</u>	ØY □N □NA □NE				
IS THERE A SYSTEM IN PLACE FOR REPORTING SSOS TO ADEQ (DESCRIBE):					
Current permit requires a monthly report to be submitted with DMR; conditions in permit regarding reporting.					
ARE ALL SSOs REPORTED REGARDLESS OF SIZE: Cash's LS overflowing day of DY MINA DI					
inspection; no report on ADEQ website. HAVE SSOs REACHED "WATERS OF THE STATE" (LIST DATE AND LOCATION OF □Y ☑N □NA □I					
EACH): Reviewed Jan 2014 - present: reporting two (2) SSO (< 100 gallons); none					
reaching waters of the State.					
PUMP STATIONS	□S □M ☑U □NA □NE				
NUMBER OF PUMP STATIONS IN SYSTEM: Four (4) NUMBER WITH BACKUP PO	WER: None				
HOW OFTEN ARE PUMP STATIONS INSPECTED/MONITORED: Weekly					
ARE MAINTENANCE RECORDS AND/OR OPERATOR LOGS KEPT: Yes					
ADEQUATE INVENTORY OF SPARE PARTS: Yes; valves, manhole covers, floats, etc.					
TYPE OF REMOTE ELECTRONIC MONITORING USED (I.E. SCADA OR AUTO DIALERS)	: <u>N/A</u>				
BRIEF SUMMARY OF EMERGENCY PROCEDURES: ID problem, fix, remove solids, disinfect area, and report.					
NUMBER OF PUMP STATIONS VISITED DURING INSPECTION (SEE ATTACHED CHECKLISTS FOR EACH): Four (4)					
SATELLITE SYSTEMS	⊠S □M □U □NA □NE				
DOES THE COLLECTION SYSTEM RECEIVE FLOW FROM SATELLITE SYSTEMS: Yes (West Plant's collection system)	(may actually be on the				
TYPE(S) OF WASTE WATER RECEIVED: DRESIDENTIAL DCOMMERCIAL DINDUST	RIAL OTHER:				
BRIEFLY DESCRIBE THE SATELLITE SYSTEM: Assisted living homes; single lift static	on.				
ANY KNOWN PROBLEMS WITH SATELLITE SYSTEM: No					
NAME, ADDRESS AND PHONE NUMBER OF PERSON RESPONSIBLE FOR SATELLITE Monticello, Mike Akin, 1960 Hwy 425 N, Monticello, AR 71655, (870) 412-4400.	SYSTEM: Grand Manor				

http://grandmanormonticello.com/index.html

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP S	STATION VISITED)
GENERAL INFORMATION AND OVERALL EVALUATION	□S □M ☑U □NA
NAME AND/OR LOCATION OF PUMP STATION: <u>Cash's LS at Hwy 278 E (33.627720,-91.767610)</u>	
TYPE(S) OF WASTE WATER RECEIVED: □RESIDENTIAL ☑COMMERCIAL □INDUSTRIA	AL OTHER:
NUMBER OF PUMPS: One (1) NUMBER OPERATIONAL: On	<u>e (1)</u>
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: Submerged	☑S □M □U □NA □NE
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS: Overflowing at time of inspection; ants in control panel.	ØY □N □NA □NE
GENERAL OPERATION AND MAINTENANCE	□S □M □U □NA
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGE OF UNRELATED EQUIPMENT:	☑S □M □U □NA □NE
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVENT UNAUTHORIZED ACCESS AND/OR TAMPERING:	☑S □M □U □NA □NE
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED, GRATED OR OTHERWISE PROTECTED:	ØS □M □U □NA □NE
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIPMENT PROPERLY INSTALLED AND MAINTAINED:	ØS □M □U □NA □NE
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIPMENT (BELTS, PULLEYS, DRIVESHAFTS, ETC.): <u>Submerged</u>	□S □M □U ☑NA □NE
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONDENSATION AND/OR GASES AND FUMES: Outside	☑S □M □U □NA □NE
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAINTENANCE: Outside	ØS □M □U □NA □NE
SEALS, VALVES AND PACKING ADEQUATELY MAINTAINED TO PREVENT LEAKS: Submerged	□S □M □U ☑NA □NE
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN WET WELLS: Solids/grease high due to electricity being out.	□S □M ☑U □NA □NE
BACKUP POWER AND ALARMS	□S ØM □U □NA
PROVISIONS FOR GENERATOR AND/OR EMERGENCY TRANSFER PUMP: No onsite generator or hook-up for portable generator; very little holding capacity in tank.	□S □M □U ☑NA □NE
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT INFORMATION POSTED: <u>Lift</u> <u>station serves one business.</u>	□S □M □U ☑NA □NE
SCADA SYSTEM (LIST PARAMETERS MONITORED):	□Y □N ☑NA □NE
	•

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)				
GENERAL INFORMATION AND OVERALL EVALUATION		□S ☑M □U □NA		
NAME AND/OR LOCATION OF PUMP STATION: Industrial Park LS at Hwy 35S and Doris Lawrence Drive	(33.620447,-91.741817)			
TYPE(S) OF WASTE WATER RECEIVED: ☐RESIDENTIAL	☑COMMERCIAL ☐INDUSTRIA	AL OTHER:		
NUMBER OF PUMPS: Two (2)	NUMBER OPERATIONAL: Tw	o (2)		
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:_A	boveground	☑S □M □U □NA □NE		
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ☑N □NA □NE		
GENERAL OPERATION AND MAINTENANCE		⊠S □M □U □NA		
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAGEQUIPMENT:		⊠S □M □U □NA □NE		
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		⊠S □M □U □NA □NE		
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		⊠S □M □U □NA □NE		
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:		⊠S □M □U □NA □NE		
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQ DRIVESHAFTS, ETC.):	, ,	⊠S □M □U □NA □NE		
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CO GASES AND FUMES: <u>Outside</u>	NDENSATION AND/OR	☑S □M □U □NA □NE		
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE: <u>Outside</u>	⊠S □M □U □NA □NE		
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	☑S □M □U □NA □NE		
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS: Solids/grease	⊠S □M □U □NA □NE		
BACKUP POWER AND ALARMS		□S ☑M □U □NA		
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T generator or hook-up for portable generator; wet well with		□S ☑M □U □NA □NE		
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED:	☑S □M □U □NA □NE		
SCADA SYSTEM (LIST PARAMETERS MONITORED):		□Y □N ☑NA □NE		

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)				
GENERAL INFORMATION AND OVERALL EVALUATION		□S ☑M □U □NA		
NAME AND/OR LOCATION OF PUMP STATION: Hood Packaging ay Hwy 35S (33.620163, -91.748355)				
TYPE(S) OF WASTE WATER RECEIVED: ☐RESIDENTIAL	. □COMMERCIAL ☑INDUSTRIA	AL DOTHER:		
NUMBER OF PUMPS: Two (2)	NUMBER OPERATIONAL: Tw	o (2)		
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE:_A	boveground	☑S □M □U □NA □NE		
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ☑N □NA □NE		
GENERAL OPERATION AND MAINTENANCE		ØS □M □U □NA		
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:		⊠S □M □U □NA □NE		
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		⊠S □M □U □NA □NE		
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:	•	⊠S □M □U □NA □NE		
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIF INSTALLED AND MAINTAINED:		⊠S □M □U □NA □NE		
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUIDRIVESHAFTS, ETC.):	, ,	⊠S □M □U □NA □NE		
ADEQUATE VENTILATION TO PREVENT EXCESSIVE COL GASES AND FUMES: <u>Outside</u>	NDENSATION AND/OR	⊠S □M □U □NA □NE		
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE: <u>Outside</u>	☑S □M □U □NA □NE		
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	☑S □M □U □NA □NE		
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V	VET WELLS: Solids/grease	⊠S □M □U □NA □NE		
BACKUP POWER AND ALARMS		□S ☑M □U □NA		
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T generator or hook-up for portable generator; wet well with		□S ☑M □U □NA □NE		
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT	INFORMATION POSTED:	☑S □M □U □NA □NE		
SCADA SYSTEM (LIST PARAMETERS MONITORED):		□Y □N ☑NA □NE		

PUMP STATION VISIT (COMPLETE A SEPARATE CHECKLIST FOR EACH PUMP STATION VISITED)					
GENERAL INFORMATION AND OVERALL EVALUATION		□S ☑M □U □NA			
NAME AND/OR LOCATION OF PUMP STATION: Huckleberry Lane at Hwy 278E (33.626610, -91.749220)					
TYPE(S) OF WASTE WATER RECEIVED: ZRESIDENTIAL	□COMMERCIAL □INDUSTRIA	AL OTHER:			
NUMBER OF PUMPS: Two (2)	NUMBER OPERATIONAL: Two	0 (2)			
NUMBER AND SIZE OF PUMPS APPEARS ADEQUATE: A	boveground	⊠S □M □U □NA □NE			
EVIDENCE OF RECENT OVERFLOWS OR HIGH LEVELS:		□Y ØN □NA □NE			
GENERAL OPERATION AND MAINTENANCE		⊠S □M □U □NA			
CLEAN AND WELL MAINTAINED WITH MINIMAL STORAG EQUIPMENT:		□S □M □U □NA □NE			
GATES/DOORS/HATCHES/LIDS/ETC. LOCKED TO PREVE ACCESS AND/OR TAMPERING:		□S □M □U □NA □NE			
WET WELLS, SUMPS AND PITS ADEQUATELY COVERED PROTECTED:		□S □M □U □NA □NE			
ELECTRICAL CONTROLS COVERS CONDUIT AND EQUIP INSTALLED AND MAINTAINED:		□S □M □U □NA □NE			
GUARDS AND SHIELDS IN PLACE AROUND MOVING EQUENIVESHAFTS, ETC.):	,	□S □M □U □NA □NE			
ADEQUATE VENTILATION TO PREVENT EXCESSIVE CONGASES AND FUMES: Outside	NDENSATION AND/OR	□S □M □U □NA □NE			
ADEQUATE LIGHTING FOR ROUTINE INSPECTION/MAIN	TENANCE: <u>Outside</u>	□S □M □U □NA □NE			
SEALS, VALVES AND PACKING ADEQUATELY MAINTAIN	ED TO PREVENT LEAKS:	□S □M □U □NA □NE			
MINIMAL ACCUMULATION OF GREASE AND SOLIDS IN V moderate.	VET WELLS: Solids/grease	□S □M □U □NA □NE			
BACKUP POWER AND ALARMS		□S ☑M □U □NA			
PROVISIONS FOR GENERATOR AND/OR EMERGENCY T generator or hook-up for portable generator; wet well wit		□S ☑M □U □NA □NE			
AUDIBLE/VISUAL ALARM WITH EMERGENCY CONTACT I	NFORMATION POSTED:	☑S □M □U □NA □NE			
SCADA SYSTEM (LIST PARAMETERS MONITORED):		□Y □N ☑NA □NE			



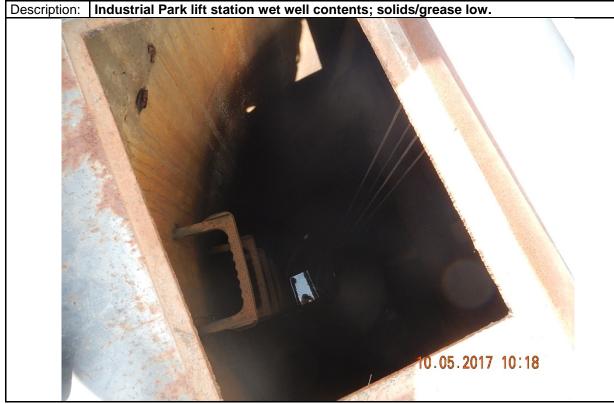


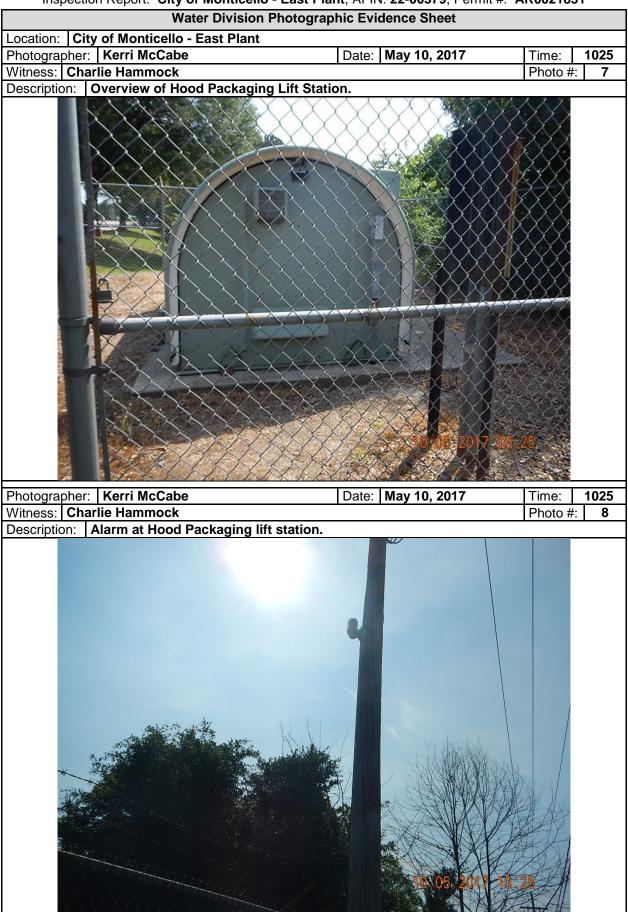
Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831

Water Division Photographic Evidence Sheet Location: City of Monticello - East Plant Photographer: Kerri McCabe Date: May 10, 2017 Time: 1018 Witness: Charlie Hammock Photo #: 5



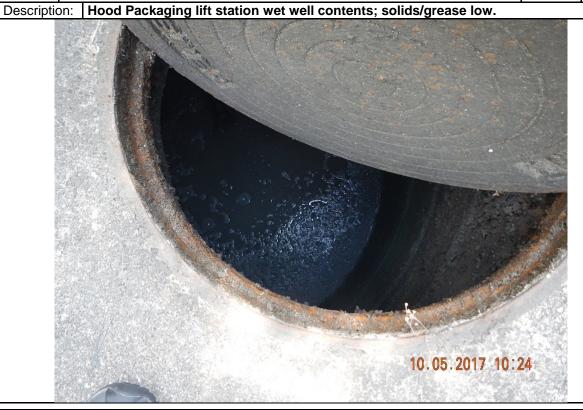
Photographer:Kerri McCabeDate:May 10, 2017Time:1018Witness:Charlie HammockPhoto #:6



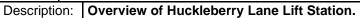


Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831

		-	Water Division I	Photographic	c Evid	dence Sheet		
Location:	City	of Montice	ello - East Plant					
Photograp	her:	Kerri McCa	abe	D	Date:	May 10, 2017	Time:	1024
Witness:	Char	lie Hammod	ck				Photo #:	9



Photographer:Kerri McCabeDate:May 10, 2017Time:1032Witness:Charlie HammockPhoto #:10





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

			Water Division Pl	hotograpl	nic Evi	dence Sheet		
Location:	City	of Montice	llo - East Plant					
Photograp	her:	Kerri McCa	abe		Date:	May 10, 2017	Time:	1031
Witness:	Char	lie Hammoo	k				Photo #	[‡] : 11

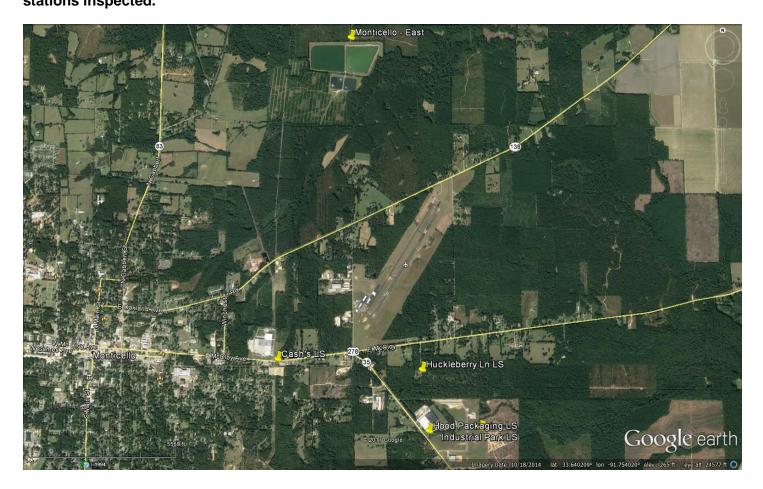
Description: Huckleberry Lane lift station pump run hours.



Photographer:Kerri McCabeDate:May 10, 2017Time:1031Witness:Charlie HammockPhoto #:12



Inspection Report: City of Monticello - East Plant, AFIN: 22-00379, Permit #: AR0021831 Figure 1. Google Earth image dated Oct 18, 2014 depicting Monticello East Plant in relation to lift stations inspected.



CITY COUNCIL
CEDRIC LEONARD
AL PEER
CAROLYN BROWN
CLAUDIA HARTNESS
MICHAEL JAMES
JOE MEEKS
PAIGE CHASE
BEVERLY HUDSON



MAYOR
DAVID ANDERSON
CLERK
ANDREA CHAMBERS
CITY ATTORNEY
WHIT BARTON

August 03, 2017

Re: City of Monticello-West Plant Inspections (Drew County)

AFIN: 22-00037

NPDES Permit No: AR0021822

ARR000000

The City of Monticello received the Compliance Evaluation Inspection, an SSO/Collection System Inspection, and a Reconnaissance Inspection of the above named facility. The paperwork has been turned over to our engineer, ETC Engineering, for corrective actions. The City respectfully requests a thirty-day extension to provide corrective actions with the required written responses and all necessary documentation.

Please contact City Hall with any questions.

or David Anderson

Sincerely

CITY OF MONTICELLO P.O. BOX 505 MONTICELLO, AR 71657 Hasler 08/03/2017 FIRST-CLASS MAIL

\$00.989 USPOSTACE



ZIP 71657 011D11639686

KERRI MCCABE POFFICE OF WATER QUALITY ADEQ 5301 NORTHSHORE DRIVE NORTH LITTLE ROCK, AR 72118-5317

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) mizanr@etcengineersinc.com



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





<u>Finding #2:</u> 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.

<u>Finding #3</u>: 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.

<u>Finding #4</u>: 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.

<u>Finding #5</u>: 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.

<u>Finding #7</u>: 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.

Response: 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 hook-ups 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.

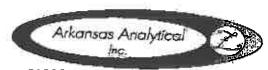
Please feel free to get in touch with me if you need additional clarification.

Sincerely,

Sr. Engineer/Principle

CC: Mayor David Anderson, City of Monticello

375-1277 21 pages follow



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 non-compliance 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-Transition chain of custody did not properly reflect articles.

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

Let me know if you need anything further.

Norma James

President

Attachments

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NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NYDES) DISCHARGE MONITORING REPORT (DMR)

ONJE No. ZOJO, CANSE Furth Approved

DIMR MAIRING ZIP CODE: 722034087

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Little Rock, AR 72208 8100 National Dr.

501~456-3233

00/11/2016

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Pacility: Monticello, City of - Bast Plant

MONTICELLO, AR 71657

P.O. BOX 505

A DORUSS:

ATTN: TAMMY KELLY, A/P COORDINATOR LOCATION-1000 FLOXENCE ROAD (CR 80) MONTICELLO, AR 71639

EPA Form 3320-1 (Rev.01/06) Previous editions may be used.

É CBJR No. 2040-0004

Form Approved

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MONTICELLO, CITY OF - EAST PLANT LOCATION: 1000 FLORENCE ROAD (CR. 80) MONTICELLO, AR 71657 FACILITY

ATTN: TAMMY KELLY, A/P COORDINATOR MONTICELLO, AR 71639

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NON-COMPLIANCE LETTER

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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		ā
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NATICAVAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

Olidia No. 2040-000m. Form. Approved

MONTICELLO, CITY OF - EAST PLANT P.O. BOX 505 MONTICELLO, AR 71857

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FACILITY: MONTIGELLO, CITY OF - EAST PLANT LOCATION 1000 FLORENCE ROAD (CR BO) MONTICELLO, AR 71639

ATTN: CHARLIE HAMMOCK, SUPT.

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EPA Form 1420-1 (Rev.01/08) Previous editions may be used.

LALLIS Rock, AR 72208 8100 Nellorial Dr. 501-455-3239

Page 1 D9/12/2018

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SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGE MONITORING REPORT (DMR)

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MONTICELLO, CITY OF - EAST PLANT

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EPA Form 3320-1 (Rev.O1/06) Previous editions may be used.

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Page 2 09/12/2018

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: NFDES PERMIT NO: AR0021831	Discharge	NUMBER: 001-
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.	37	
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No results,

DWR Comments

REPORT FLOW AS MONTHEY AVG. & DAILY MAX. ÎN MILLION GALLONS PER DAY. SUBMIT TABULAR OVERFLOW REPORT WITH DMR EACH MONTH, SEE PART II, CONDITIONS 5. %. 22-00379

Comments

Attachments



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Edit Check Errors

No results.

DIMR Community

REPORT FLOW AS MONTHLY AVG. & DAILY MAX. (N MILLION GALLONS PER DAY. SUBMIT TABULAR OVERFLOW REPORT WITH DMR EACH MONTH, SEE PART II, CONDITIONS 11, 12, & 13. (P) USE DISCHARGE EVENT OBSERVATION (84164) TO REPORT NUMBER OF DAYS/MONTH AVG. DSCHG EXCEEDED CRITICAL.

Comments

: Attachments

NON-COMPLIANCE LETTER

DATE:						
ARKANSAS DEPAR 5301 NORTH SHO NORTH LITTLE R ATTN: ENFORCEM	RE DRIVE OCK, AR 7211:		QUALITY			
RE: NPDES PERM	IT NO: AR002	1831		DISCHA	rge numbe r	: 001-A
CLIENT: MONTICE ADDRESS:1000 FT CITY: MONTICELE STATE: AR ZIP: 71639 PHONE: 870-352- CONTACT: CHARLE	LORENCE ROAD LO -2931	(CR80)	ANT			
DATE OF NON-COMPLIANCE	Parameter Exceeded	CONCENTRA	tion lo	ading	PERMIT LIMITS	
04/01-30/17	n+n an Phos an	VALYSIS NOT	CONDUCTED CONDUCTED	THIS MONI	TORING PER	LIOD
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TIME ESTIMATED	THAT IT WILL	TARE:		<u> </u>		
YOURS TRULY,						
AUTHORIZED SIGN	ATTIRE					

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Permittee:	MONTICIELLS			Hajori	,,				
		Medal sees of the comments.	(N)	Perm	Permittee Address:	P.O. BOX 505			
Padlitys	MONTICELLO,	MONTICELLO, CITY OF - EAST: PLANT	ΓN	FacHi	Facility Lecations	MONTICELLO, AR 71657 1000 FLORENCE ROAD (CR 80)	657 NP (CR 89)		
Permitted Feature:	001 - External Oulfall	i Outfall		Disch	Discharge:	MONTICELLO, AR 71639 A - DQ1-MONTHIY-TRTD MEINICIDAL MAA	639 CTD MEINICEDAL	MATE	
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No results.

DMR Comments

REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MILLION GALLONS PER DAY. SUBMIT TABULAR OVERFLOW REPORT WITH DMR EACH MONTH, SEE PART II, CONDITION 5. %. 22-00379

Contribities

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
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 PARAMETER NON-COMPLIANCE EXCEEDED CONCENTRATION LOAD	PERMIT PING LIMITS
05/01-31/17 DF% STREAM 52.1 F.C 30DA GEO 1249 F.C 7 DA GEO 15500	52 1000 2000
WE FEEL THIS PROBLEM WAS DUE TO:	
WE PLAN ON CORRECTING THE PROBLEM IN THIS MANNER:	
TIME ESTIMATED THAT IT WILL TAKE:	<u> </u>
YOURS TRULY,	
AUTHORIZED SIGNATURE	





Edit DMR

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Permitted Feature: Report Dates & Stekus		001 Exteinal Qutfall			Dísc	Discharge:	MONTICE A - 001-M	MONTICELLO, AR 71639 A - 001-MONTHLY-TRTD MUNICIPAL WW	VICIPAL 1	WW	
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Edit Check Errors

No results.

DMR Comments

REPORT FLOW AS MONTHLY AVG. & DAILY MAX. IN MILION GALLONS PER DAY. SUBMIT TABULAR OVERFLOW REPORT WITH OMR EACH MONTH, SEE PART II, CONDITIONS 11, 12, & 13. (P) USE DISCHARGE EVENT OBSERVATION (84164) TO REPORT NUMBER OF DAYS/MONTH AVG DSCHIS EXCEEDED CRITICAL.%.

Comments

NON-COMPLIANCE LETTER

37/1/1 TAY

DATE:				
ARKANSAS DEPAR 5301 NORTH SHO NORTH LITTLE F ATTN: ENFORCEM	DRE DRIVE ROCK, AR 72118	ERONMENTAL QUALIT	T Y	
RE: NPDES PERM	IIT NO: AR0021	1831	DISCE	ARGE NUMBER: 001-A
CLIENT: MONTICE ADDRESS:1000 E CITY: MONTICEL STATE: AR ZIP: 71639 PHONE: 870-352 CONTACT: CHARL	LORENCE ROAD LO -2931	(CR80)		
DATE OF NON-COMPLIANCE		CONCENTRATION	LOADING	PERMIT LIMITS
06/01-30/17 WE FEEL THIS P.	F.C 30DA GEO F.C 7 DA GEO	15121 24200		52 1000 2000
WE PLAN ON COR	RECTING THE P	ROBLEM IN THIS M	Anner:	
TIME ESTIMATED	TEAT IT WILL	TAKE:		
YOURS TRULY,				
AUTHORIZED SIGN	IATURE		_	

(2)

1949 (20)



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.

AR0021831 - WWTP

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 McCabe

Inspector Supervisor Office of Water Quality

Kerri Mc Cale

cc: Mizan Rahman, PE, ETC Engineers & Architects, Inc.,

mizanr@etcengineersinc.com

McCabe, Kerri

From: Taylor, Bailey

Sent: Tuesday, November 14, 2017 8:38 AM

To: McCabe, Kerri

Subject: FW: Monticello CAP - Permit #s AR0021822 & AR0021831

Attachments: CAP Response_20171110.pdf

Hey Kerri,

Monticello sent me the attached CAP. If references collection system backup generators so I thought you might be interested.

Thanks,

Bailey Taylor

Enforcement Analyst Office of Water Quality Arkansas Department of Environmental Quality 501-682-0639

From: Mizan Rahman [mailto:mizanr@etcengineersinc.com]

Sent: Monday, November 13, 2017 11:39 AM

To: Taylor, Bailey

Cc: Mizan Rahman; Mayor David Anderson

Subject: Monticello CAP - Permit #s AR0021822 & AR0021831

Dear Ms. Taylor,

Please find the attached letter written in response to your letter dated September 13, 2017. If you have any questions please feel free to call me at 501-375-1786 or 501-580-5495 (c). A hard copy op the letter is also being mailed to you.

Regards, *Mizan*

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



ETC Engineers & Architects, Inc.

ENGINEERS - ARCHITECTS - PLANNERS

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

November 10, 2017

Bailey Taylor **Enforcement Analyst** Office of Water Quality **ADEQ** 5301 Northshore Drive North Little Rock, AR 72118

Re: City of Monticello – Non Compliance of Consent Administrative Orders NPDES Permit # AR21822 & AR0021831

Dear Ms. Taylor,

On behalf of the City of Monticello and Mayor Anderson, I am hereby submitting a Corrective Action Plan (CAP) for your review and approval. The issues to be addressed in the CAP were identified in your letter dated September 13, 2017 and Ms. McCabe's letter dated October 4. 2017. The responses to the CAP items are as follows:

1. Operation and Maintenance Manual for sampling procedures:

The City has retained the services of Ms. Norma James of Arkansas Analytical, Inc. to conduct a multiday workshop at the City on Sampling Techniques and Procedures. All wastewater employees will participate in the workshop. The purpose of the workshop is to provide continuing education on current sampling techniques and rules and regulations relating to sampling. An O&M Manual will be developed during the workshop which will become the primary reference material for the staff on all future sampling tasks. The workshop is scheduled to take place in the first week of December, 2017. The consultant has not set an exact date yet.

2. Hydrographic Controlled Release Procedure:

An automated hydrograph controlled release system has been designed. The City has contracted with Shields & Associates, Inc., Contractors and Instrument Supply, Inc. to provide all equipment and installation services for the system. Once all of the equipment are installed, the contractors will hold training sessions to train the staff in operation of the system. All of the equipment are already at the site and it is anticipated that all work will be completed in 30 days.

BUILDING





3. Contingency Plan for power failures within the collection system:

The City has planned to install "Quick Connect" electrical connector at each wastewater pump station so that a portable generator can be connected to the electrical panel at all pump stations to power the pumps if and when a power failure occurs at the station. The City is in the process of purchasing 4 portable generators of adequate capacity to provide emergency power. The generators will be stored at a central location so that they can be easily moved to any of the lift stations. Jackie Forrest, a local electrician, has been contracted to install a "Quick Connect" device at each of the wastewater lift stations. It is anticipated that four stations will be completed by the end of the year (two on the East and two on the West). The entire project will be completed by the end of March 2018. The City has received quotes for the purchase of two generators and will have them purchased within the next 2 months. The remaining 2 generators will be acquired by the end of the project.

4. Non Compliance Report:

Mr. Charles Hammock has been appropriately instructed to comply with this regulatory requirement. In addition, the issue will be discussed in greater details at the workshop.

5. Effluent Limit Violation:

It is our belief that once the automated hydrograph control system is in operation, the effluent limit violation will not occur.

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

Sincerely,

Mizan Rahman, P.E.

Sr. Engineer/Principle

CC: Mayor David Anderson, City of Monticello



November 16, 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 of Monticello East WWTP and collection system. The information provided sufficiently addresses the violations referenced in my inspection reports. At this time, the Department has no further comment concerning these particular inspections. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. 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 McCabe

Kerri Ms Coly

Inspector Supervisor Compliance Branch

Office of Water Quality