



August 9, 2023

Jason Akers, Mayor City of Monticello 203 West Gaines St. Monticello, AR 71688 Sent to Email Address: jakers@cityofmonticelloar.com

RE: City of Monticello- East Plant Inspection AFIN: 22-000379 Permit No.: AR0021831 22-00037 AR0021822

Dear Mayor Akers:

On March 30, 2023, I performed a Compliance Evaluation Inspection (CEI) 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. A copy of the inspection report is enclosed for your records.

Please refer to the "Summary of Findings" section of the inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed 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. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by August 24, 2023.

If I can be of any assistance please contact me at <u>Michael.young@adeq.state.ar.us</u> or 501-837-2073.

Sincerely,

Michael Young Inspector, Office of Water Quality 5301 Northshore Drive, North Little Rock, AR, 72118

(su)	ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY INSPECTION REPORT							
(II)		AF	IN: 22-00037	PE	2ERMIT #: AR0021831			DATE: 3/30/2023	
1801		СС	DUNTY: 22 Dre	w	PI		#: <b>126953</b>		MEDIA: WN
		GF	S LAT: 33.606	5 <b>0</b> 14	4 LONG: -91.835199 LOCATION: Entrance				9
	FACILITY INFORMAT	ION			INS	PEC.	TION INFO	RMATIO	N
	y of Monticello- East Plant				1 - Municipal	INSPECT	TOR ID#: 531 S - State		
1466 Old Warren Road					FACILITY EVALUATION RATING:  INSPECTION TYPE:    3 - Satisfactory  Compliance Evaluation			Evaluation	
Мо	onticello				DATE(S): ENTR 3/30/2023 09:	Y TIME:	EXIT TIME: 12:18	PERMIT E	FFECTIVE DATE:
RESPONSIBLE OFFICIAL								JZU XPIRATION DATE:	
NAME: / TITLE Jason Akers / Mayor							3/31/2	2025	
COMPANY:				FAYETTEVILLE SHALE RELATED: N					
			-	FAYETTEVILLE S	HAL	E VIOLATI	ONS: N		
203 West Gaines St.				INSF	PECT		ICIPANT	S	
					NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Ronnie Donaldson/Operator (Lic. # 013568)				
	e & ext: / Fax:				Robert Diaz/OWC			<i>. #</i> 0135	00)
870	0-367-4400 / 870-367-4405								
jakers@cityofmonticelloar.com CONTACTED DURING INSPECTION: Yes									
AREA EVALUATIONS									
(S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)									
S	PERMIT	S FLOW MEASUREMENT			S	STORMW			
Μ	RECORDS/REPORTS	S LABORATORY				M	FACILITY SITE REVIEW		
S	<b>OPERATION &amp; MAINTENANCE</b>	<b>N</b> EFFLUENT/RECEIV				S			IG PROGRAM
Μ	SAMPLING	S	SLUDGE HAI	ND	LING/DISPOSAL	S	PRETREA	ATMENT	
**	OTHER:								

#### SUMMARY OF FINDINGS

1.) Total Phosphorus and Nitrate + Nitrite Nitrogen were not analyzed in the month of January 2023. This is a violation of permit condition Part IA.

2.) Total Recoverable Copper was not sampled in the first quarter of 2023. This is a violation of permit condition Part IA.

3.) Operators licenses at the City of Monticello have expired for all operators due to not signing the Electronic Signature Agreement (ESA) on E-portal. This is a violation of Part II. (1.).

4.) Screw pump between aeration basins and stabilization ponds not in operation. This is a violation of permit condition Part III. Section B. (1.) (A.).

5.) Solids removed by the bar screen were observed on the ground. This is a violation of Part II. (6.) and Part III. Section B. (6.) (A.).

6.) A non-compliance report was not submitted for the failure to analyze all parameters in Part IA. In January 2023. Additionally the non-compliance report submitted in March 2023 stated there was no discharge so there was no analysis of Total Copper but there was a discharge in January that could have been analyzed for Total Copper. This is a violation of permit condition Part III. Section D. (7.).

### GENERAL COMMENTS

On March 30, 2023 I completed a Compliance Evaluation Inspection (CEI) at City of Monticello – East Plant with the above participants in attendance. City of Monticello – East Plant has a treatment system consisting of a bar screen, two aerated basins in series followed by two stabilization basins in series. City of Monticello – East Plant is a Hydrologic Control Release (HCR) facility which allows for a discharge that is 58% of the receiving stream during May-October and 78% during November-March. This is completed by having a flow monitor in the receiving stream and the flow meter at Outfall 001 communicate the percentage of flow and an automatic gate is raised and lowered as the flow of the receiving stream changes. January 2023 Discharge Monitoring Report (DMR) has a flow at Outfall 001 that was reported to be 62 MGD. This flow would be greatly exceeding the design flow which is 7.2 MGD. There has also only been one month where a discharge was reported from Monticello – East Plant from January-June 2023. This inspection consisted of a site evaluation and records review. All of the wastewater operators license have expired for the City of Monticello. Contact Sarah Pierce to fill out an Electronic Signature Agreement (ESA) on E-Portal.

Site Evaluation:

My inspection started where the influent entered the wastewater plant from the final influent pump which is near a packaging and labeling company. Ink from this company changes the color of the influent and the day of the inspection the influent was a dark green color (see photo 1). Influent travels through an automatic bar screen and all the mechanics were in operation (see photos 2-3). Removed materials are collected in a bin for disposal (see photo 4). I observed solids on the ground around the bin and on the road where the solids are loaded for disposal (see photos 5-7). Aerators were in operation in both of the ponds and the baffle curtains were in good working condition (see photos 8-9). I observed the gate used to control the discharge at Outfall 001 and there was no discharge occurring (see photo 10). Inside of the building I observed the flow gage for the receiving stream and Outfall 001 (see photos 11-12). In the final stabilization basin, I observed very clear water (see photos 13-14) and we continued to where there is a set of screw pumps that bring water from the aeration basin to the stabilization basin. One of the screw pumps was operating (see photo 15) and delivering water to the stabilization basin (see photo 16). There are two screw pumps and only one was in operation (see photos 17-18). Water entering the stabilization basin looked clear and there was very little foaming (see photos 19-21).

# **Records Review:**

Following the inspection, I requested the discharge records for 2023 and received analysis information for January 2023. This was the only reported discharge for 2023. Discharge from Outfall 001 was reported to be only three (3) consecutive days of the month. During the discharge, an analysis for Total Copper (quarterly), Total Phosphorus (monthly), and Nitrate-Nitrogen (monthly) were not performed. Additionally, when reviewing the information in NetDMR, I noticed that the monthly average concentration was entered as the 7-day average so that the same number appears in both reporting blanks. I contacted the contracted laboratory for sample analysis and they stated that there were incorrect calculations completed and that they would start the process of submitting a correct DMR.

Mill	
INSPECTOR'S SIGNATURE: Michael Young	DATE: 07/24/2023
SUPERVICORIO SIGNATURE	
SUPERVISOR'S SIGNATURE: <b>-Supervisor Name</b>	DATE: 8/2/2023

Inspection Report: City of Monticello- East Plant, AFIN: 22-00037, Permit #: AR0021831

Inspection Report: City of Monticello- East Plant, AFIN: 22-00037, Permit	#: AR0021831
SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	ØS OM OU ONA ONE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	
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	
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	Øs 🗆 m 🗇 u 🗆 na 🗆 ne
a. DATES AND TIME(S) OF SAMPLING:	
b. EXACT LOCATION(S) OF SAMPLING:	
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	
d. ANALYTICAL METHODS AND TECHNIQUES:	
e. RESULTS OF CALIBRATIONS:	
f. RESULTS OF ANALYSES:	
g. DATES AND TIMES OF ANALYSES:	
h. NAME OF PERSON(S) PERFORMING ANALYSES:	
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	Øs 🗆m 🗇u 🗇na 🗇ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	Øs 🗆m 🗇u 🗇na 🗇ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	
DETAILS:	L
1. TREATMENT UNITS PROPERLY OPERATED:	Øs 🖙 🗇 u 🖓 na 🖓 ne
2. TREATMENT UNITS PROPERLY MAINTAINED:	Øs 🗆 m 🗇 u 🗆 na 🗆 ne
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	Øs 🗆m 🗇u 🖾na 🖾ne
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	Øs 🖙 🗇 u 🗆 na 🗆 ne
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs 🛯 m 🗇 u 🖓 na 🖓 ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	Øs 🗆m 🗇u 🗇na 🗇ne
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs 🗆 m 🗇 u 🗆 na 🗆 ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR:	
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:	

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	
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:	
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	
a. SAMPLES REFRIGERATED DURING COMPOSITING:	
b. PROPER PRESERVATION TECHNIQUES USED:	
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	DY ON ØNA ONE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE:	
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	
4. CALIBRATION FREQUENCY ADEQUATE:	
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	
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 OM OU ONA ONE
DETAILS:	
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:	
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	
4. QUALITY CONTROL PROCEDURES ADEQUATE:	
5. DUPLICATE SAMPLES ARE ANALYZED <u>&gt;</u> 10% OF THE TIME:	
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	
7. COMMERCIAL LABORATORY USED:	
a. LAB NAME: <u>Arkansas Analytical</u>	
b. LAB ADDRESS: Little Rock	
c. PARAMETERS PERFORMED: <u>All except pH and DO</u>	
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:	Øy 🛛 n 🖾 na 🖾 ne

SECTION G	SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS										
BASED ON	VISUAL OBS	ERVATIONS C	DNLY			ØS DM D					
DETAILS:											
OUTFALL #:	OIL SHEEN	FLOATING SOLIDS	COLOR	OTHER							
001	ND	ND	ND	ND	ND	ND	-				
SECTION H	: SLUDGE DIS	POSAL									
SLUDGE D	DISPOSAL ME	ETS PERMIT F	REQUIREMEN	ГS		ØS 🗆 M 🗆					
DETAILS:											
1. SLUDGE M	ANAGEMENT ADEQU	ATE TO MAINTAIN EF	FLUENT QUALITY:			⊠s ⊡m					
2. SLUDGE R	ECORDS MAINTAINE	D AS REQUIRED BY 40	) CFR 503:			⊠s ⊡m					
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST,	AGRICULTURAL, PUE	BLIC CONTACT SITE):						
SECTION I:	SAMPLING IN	SPECTION PRO	OCEDURES								
SAMPLE F	ESULTS WITH	HIN PERMIT R	EQUIREMENT	S			U ØNA ⊡NE				
DETAILS:											
1. SAMPLES	OBTAINED THIS INSPI	ECTION:				ΠY	On Øna One				
2. TYPE OF S	AMPLE: GRAB:		IETHOD: FREQUE	NCY:							
3. SAMPLES	3. SAMPLES PRESERVED:										
4. FLOW PRC	4. FLOW PROPORTIONED SAMPLES OBTAINED:										
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:											
6. SAMPLE R	6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:										
7. SAMPLE S	PLIT WITH PERMITTEI	E:				ΠY	□n Øna □ne				
8. CHAIN-OF-	8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:										
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:											
	: STORM WAT		-								
	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS			U ⊠NA ⊡NE				
DETAILS:											
1. SWPPP UP	DATED AS NEEDED:	DATE OF LAST UP	DATE:								
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:								
4. POLLUTIO	4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:										
5. LIST OF PC											
	RUCTURAL BMPS:										
	ON-STRUCTURAL BMF										
	PERLY OPERATED AI										
11. INSPECTIO	INS CONDUCTED AS	REQUIRED:				ΔY					

## **DMR Calculation Check**

Reporting Period:	From	2023 Year	01 Month	01 Day	_ To _	2023 Year	01 Month	<u>31</u> Day
Parameter Checked:			_					
		Loading Mass				Concen Mon		
	Mo. /	Avg Ibs/o	day	Mo. A	vg r	ng/l	7-day Avg	mg/l
Reported Value:		N/A			9.7		9.7	
Calculated Value:		N/A			9.7		<mark>12.8</mark>	
Permit Value:		N/A			90		135	

If calculated value does not equal reported value, explain:

Incorrect reporting of 7-Day Average. Facility is reporting the monthly average as the 7-day average.

<u>City of Monticello – West Plant has only reported a discharge in January 2023. All other months are marked "no discharge".</u>

## **DMR Calculation Check**

Reporting Period:	From <u>2023</u> Year	01 Month	<u>01</u> To Day	2023 Year	01 Month	<u>31</u> Day
Parameter Checked:	Ammonia	-				
	Loading Mass			Concer Mon		
	Mo. Avg Ibs/d	lay	Mo. Avg	- mg/l	7-day Avg	mg/l
Reported Value:	N/A		1.34		<mark>1.343</mark>	
Calculated Value:	N/A		1.34		<mark>1.80</mark>	
Permit Value:	N/A		12.6		22.5	6

If calculated value does not equal reported value, explain:

Not equal. Facility is entering monthly average as 7 day average.

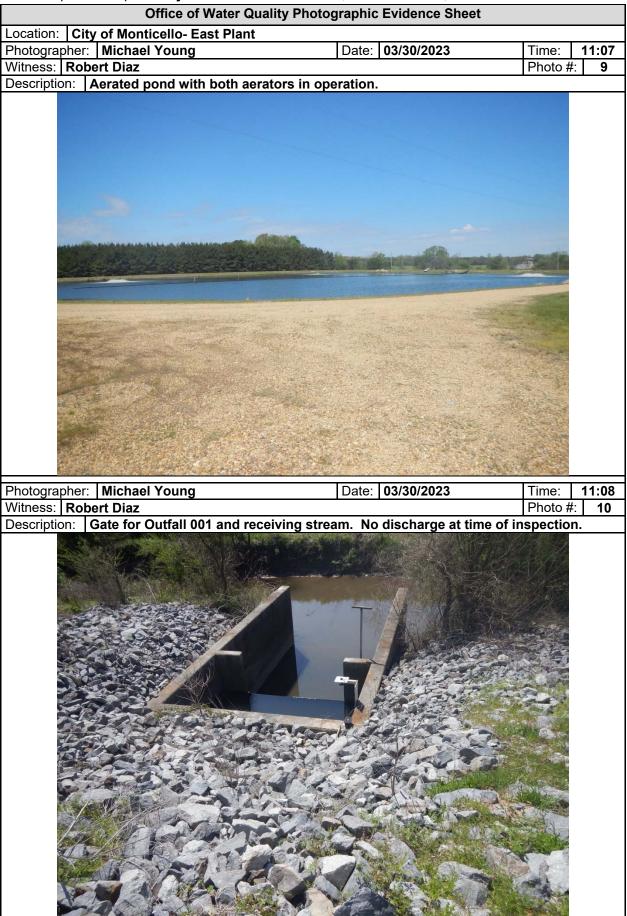
<u>1.80 mg/L + 1.36 mg/L + 0.847 mg/L = 1.34 mg/L</u>

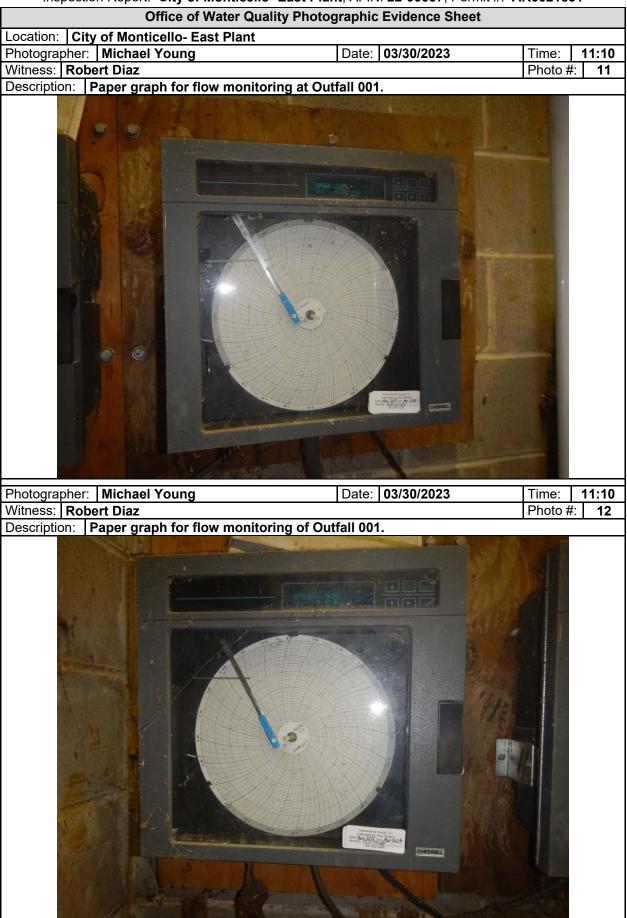


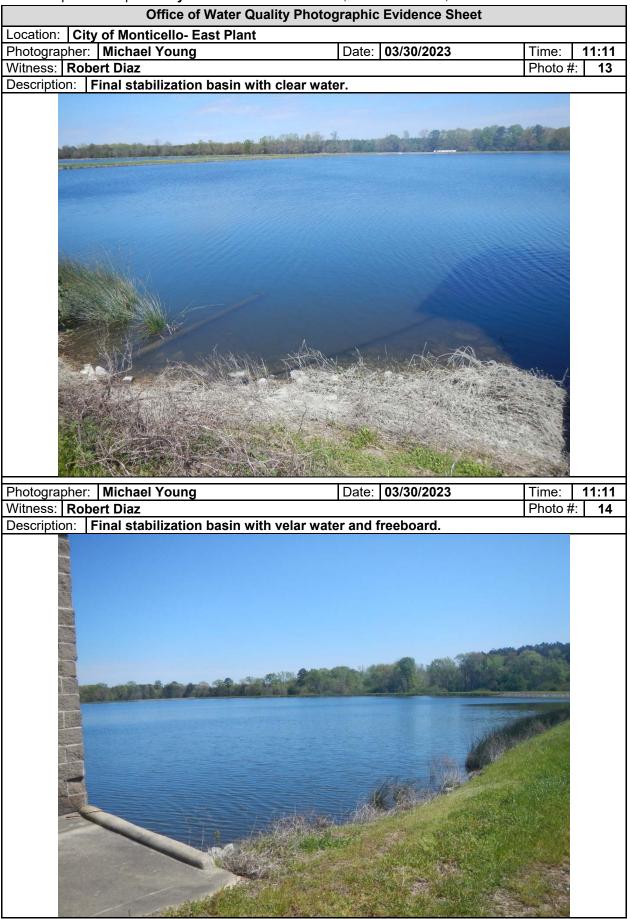






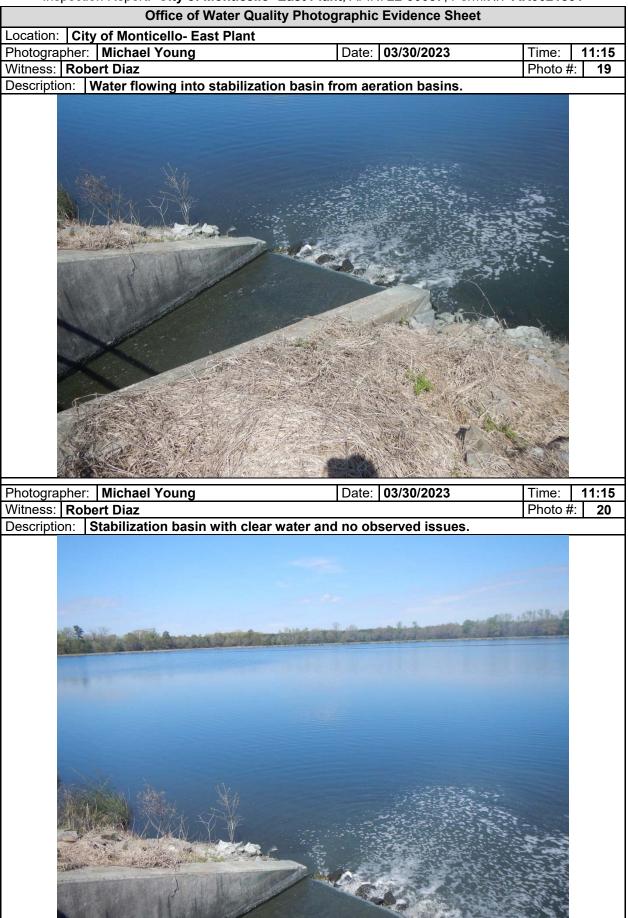


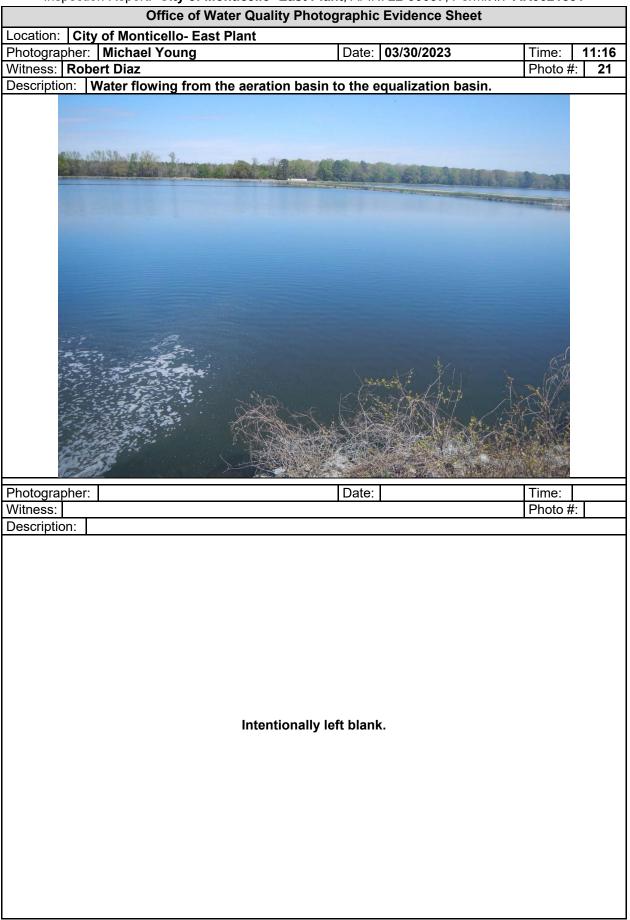
















From:	Andrea Chambers <achambers@cityofmonticelloar.com></achambers@cityofmonticelloar.com>
Sent:	Tuesday, August 22, 2023 10:56 AM
То:	Water-Inspection-Report
Subject:	FW: City of MonticelloEast Plant InspectionAFIN 22-000379 and AFIN 22-00037
Attachments:	scan.pdf
Follow Up Flag: Flag Status:	Follow up Flagged

RE: City of Monticello -- East Plant Inspection AFIN: 22-000379 Permit No.: AR0021831 22-00037 Permit No.: AR0021822

Attached is the City of Monticello's response to the inspection report on August 09, 2023. Both Ronnie Donaldson and Mayor Jason Akers have signed the form. Please let us know if we need to add any information or take further actions.

Thank you,

Andrea Chambers City of Monticello Water Department Manager CITY COUNCIL CEDRIC LEONARD AL PEER CRAIG McRAE CLAUDIA HARTNESS MICHAEL JAMES JOE MEEKS MICHAEL WIGLEY CLARISSA PACE



MAYOR JASON AKERS

CITY ATTORNEY WHIT BARTON

City of Monticello, Arkansas INCORPORATED NOVEMBER 01, 1852

August 17, 2023

Attn: Office of Water Quality Compliance Branch

Re: City of Monticello – East Plant Inspection AFIN: 22-000379 Permit No.: ARR0021831 22-00037 ARR0021822

Per the recent inspection of the City of Monticello's facility, the response for each item noted in the inspection is addressed.

- Total Phosphorus and Nitrate + Nitrite Nitrogen were not analyzed in the month of January 2023. This is a violation of permit condition Part 1A.
   RESPONSE: During the conversion to a new lab, the necessary sampling bottles was not provided for the month of January. Sampling requirements were also changed at this time including a change of operators for the facility.
- Total Recoverable Copper was not sampled in the first quarter of 2023. This is a violation of permit condition Part 1A.
  RESPONSE: During the conversion to a new lab, the necessary sampling bottles was not provided for the month of January. Sampling requirements were also changed at this time including a change of operators for the facility.

MUNICIPAL BUILDING, 203 WEST GAINES MONTICELLO, ARK I PHONE: 870.367.4400 I FAX: 870.367.4405

3. Operator's licenses at the City of Monticello have expired for all operators due to not signing the Electronic Signature Agreement (ESA) on E-portal. This is a violation of Part II. (1.).

**RESPONSE:** all five operators have completed this process online on August 16<sup>th</sup>, they are still waiting on the confirmation of approval.

- 4. Screw pump between aeration basins and stabilization ponds not in operation. This is a violation of permit condition Part III. Section B. (1.) (A.). **RESPONSE:** City Employees found the motor on the screw pump to be working properly and the bearing on the bottom in the pit is the actual problem. City employees are attempting to find a bearing for repairs.
- 5. Solids removed by the bar screen were observed on the ground. This is a violation of Part II. (6.) and Part III. Section B. (6.) (A.). **RESPONSE:** The solids have been removed from the ground and the area is clean.
- 6. A non-compliance report was not submitted for the failure to analyze all parameters in Part IA. in January 2023. Additionally, the non-compliance report submitted in March 2023 stated there was not discharge so there was no analysis of Total Copper but there was a discharge in January that could have been analyzed for Total Cooper. This is a violation of permit condition Part III. Section D. (7.).

**RESPONSE:** During the conversion to a new lab, the necessary sampling bottles was not provided for the month of January. Sampling requirements were also changed at this time including a change of operators for the facility.

Thank you,

No. 12/2027

Ronnie Donaldson

Operator

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