



ARKANSAS
Department of Environmental Quality

July 13, 2015

CERTIFIED MAIL: 91 7199 9991 7030 4936 9540

Mr. Robert Holmes
Goshen Municipal POID #2
3838 Oaklawn Drive, Ste. 920
Dallas, TX 75219

RE: Permit No.: 4815 WR-4; AFIN: 60-00671
Permit Effluent Violations and Requesting a Corrective Action Plan (CAP)

Dear Mr. Holmes:

On July 10, 2015, ADEQ conducted a review of the Monthly Monitoring Reports submitted by Goshen Municipal POID #2 from October 1, 2010 through July 1, 2015. The review revealed that twenty-three (23) violations of the permitted effluents have been reported. A detailed list of the violations is included with this letter.

As a result of this review, the Department recommends that you consult with a Professional Engineer (PE) for the purpose of developing a CAP. The CAP shall be certified by a PE registered in the State of Arkansas and should detail the corrective actions taken or that will be taken to achieve compliance with the terms of the Permit. At a minimum, the plan shall include the following information:

- The cause(s) of the effluent violation(s).
- The actions to be taken to correct and prevent the recurrence of the effluent violations.
- A milestone schedule for compliance with the permit effluent limits.
- A final date compliance with the permit, not to exceed December 31, 2015.

In addition, the Department has discovered incorrect reporting of your Daily Max flow numbers on your Monthly Monitoring Reports. The Daily Max flow is the highest flow received by your treatment system for that day, and not the total maximum flow possible through the system as is being currently reported. Obtaining the Daily Max flow will require daily collection of data from the flow measuring device installed on your system. The data collected will be reported on your Monthly Monitoring Reports.

Please submit the CAP to the ADEQ Water Division Enforcement Branch no later than August 13, 2015 to the address below. The CAP may also be emailed to farmers@adeq.state.ar.us. The complexity and duration of the corrective action will be considered in determining if formal enforcement action will be proposed.



ARKANSAS
Department of Environmental Quality

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-7399 or you may e-mail me at farmers@adeq.state.ar.us.

Sincerely

Sandra J Farmer
Environmental Enforcement Analyst
ADEQ – Water Enforcement Branch

6/5/2015

DMR Effluent Violations Since 10/1/10

4815-WR-3 – Goshen Municipal POID #2

	Total Phosphorous	CBOD5	pH	TSS	AN	Fecal	Flow Monthly	Daily Max*
10/1/2010	4.6	2	6.3	8	5.4	2	31400	95000
11/1/2010	5.2	2	6.2	2.5	7	2	81300	95000
12/1/2010	3.4	2	6.2	2	1.5	2	47800	95000
1/1/2011	5.3	2	6.1	5.3	8.1	2	32290	95000
2/1/2011	5.9	2	6.3	2	9.2	104	36910	95000
3/1/2011	4.9	2	6	8	9	2	57300	95000
4/1/2011	5.5	2	6.7	2	4.5	38	59540	95000
5/1/2011	4.7	2	6.3	9	3.1	10	56220	95000
6/1/2011	4.9	2	6.1	12	5.3	24	124760	95000
7/1/2011	0	0	0	0	0	0	0	0
8/1/2011	4.6	2	6.3	4	10.5	412	57114	95000
9/1/2011	6	2	6.2	2	10.5	1200	75567	95000
10/1/2011	5.9	2	6.3	12	9.1	68	59604	95000
11/1/2011	4.9	2	6.3	4	5.3	16	66589	95000
12/1/2011	6.3	2	5	10	6.8	25	66270	95000
1/1/2012	5.6	2	6.1	8	9	2	52130	95000
2/1/2012	5.3	2	6.2	2	10.3	25	66715	95000
3/1/2012	5.9	2	6.3	2	8.5	2	67050	95000
4/1/2012	6.2	2	6.2	3	9.1	2	69240	95000
5/1/2012	6.3	2	6.2	10	14	2	128895	95000

ADEQ

ARKANSAS
Department of Environmental Quality

6/1/2012	7	2	5.4	8	3.1	128	37835	95000
7/1/2012	7.1	2	6.1	2	3.3	20	55155	95000
8/1/2012	7.2	2	4	11	7	18	111770	95000
9/1/2012	6.4	2	6.7	8	0.1	482	92580	95000
10/1/2012	5.9	2	6.1	4	1.2	224	100980	95000
11/1/2012	5.7	2	7.7	10	10.2	212	107415	95000
12/1/2012	6.9	2	7.3	6	11.1	100	89490	95000
1/1/2013	6.6	2	7.2	6	10.2	46	114720	95000
2/1/2013	6.8	2.8	6.6	18	9.9	40	106595	95000
3/1/2013	4.2	3.4	6.7	2	2.3	2	172285	95000
4/1/2013	5.7	2.2	7.6	6	3.7	364	165445	95000
5/1/2013	6.6	3	7.5	10	0.4	118	215270	95000
6/1/2013	7.1	2	7.7	2	4	206	196985	95000
7/1/2013	0	0	0	0	0	0	0	0
8/1/2013	0.3	2	7.1	6	0.9	332	318780	95000
9/1/2013	6.9	2	7.2	2	0.4	48	406250	95000
10/1/2013	4.7	2	7.7	4	0.4	72	577419	95000
11/1/2013	3.6	2	6.5	2	0.2	208	547746	95000
12/1/2013	5.8	2	7.7	14	0.2	204	484820	95000
1/1/2014	5.2	3	8.8	4	0.1	12	605495	95000
2/1/2014	5.6	3	6.2	2	3.4	114	261680	95000
3/1/2014	5.6	2	8.1	2	2.7	4	387935	95000
4/1/2014	3.5	2	6.8	8	5.5	34	287860	95000
5/1/2014	5.6	2	6.1	6	0.5	1000	463600	95000
6/1/2014	7.7	2	7.1	8	1.3	125	388670	95000
7/1/2014	7.4	2	6.3	22	3.1	608	501500	95000
8/1/2014	7.3	7.2	6.7	10	6.3	72	418840	95000
9/1/2014	6.8	10	7.8	8	1.8	212	532900	95000
10/1/2014	6	3	5.6	6	6.7	62	454965	95000
11/1/2014	6	6	7.9	7.5	4.3	194	455005	95000
12/1/2014	6	9	7.5	12	4.2	2800	587475	95000
1/1/2015	6.3	8	7.2	12	3.9	8	168425	95000
2/1/2015	5.6	2	7.7	4	12.6	1700	769105	95000
3/1/2015	7.9	6	7.4	14	8.3	8	525069	95000
4/1/2015	7.9	7.8	6.8	12	12.1	54	491751	95000
5/1/2015	6.5	3.5	6.4	10	9.2	508	595995	95000
6/1/2015	6	2	6.2	8	12.9	800	516615	95000

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

5301 NORTHSHORE DRIVE / NORTH LITTLE ROCK / ARKANSAS 72118-5317 / TELEPHONE 501-682-0744 / FAX 501-682-0880

www.adeq.state.ar.us



ARKANSAS
Department of Environmental Quality

7/1/2015

Limit	Report	15	6.0-9.0	15	Report	2000			
Violations		2	2	6	4	2	3	2	2

Notes

*The daily max flow has not been reported correctly. 95,000 gpd is what the treatment system is capability of treating not the actual flow. 52520 gpd is what the drip fields are able to accomodate; therefore, the limit would be 52520 gpd.