

## Barber, Kyle

---

**From:** Barber, Kyle  
**Sent:** Wednesday, February 15, 2017 11:06 AM  
**To:** 'mizanr@etcengineersinc.com'; 'shawkata@etcengineersinc.com'  
**Cc:** Johnson, Miles; McDonald, Scott; Healey, Richard; 'montcity@att.net'  
**Subject:** Monticello CAOs; NDPEs Permit Nos. AR0021822 &

Good morning

After speaking with Mizan this morning, I did some more research into the Monticello Consent Administrative Orders (CAOs LIS [16-063](#) & [16-064](#)), and here is where everything stands:

### Industrial General Stormwater Permit Coverage:

I was able to locate the email from ADEQ Water Permits stating that the West Plant would not need IGP coverage, provided that all runoff was routed to the WWTP ([Page 2, here](#)).

If the city plans on claiming this exemption for both plants, then we will need some kind of letter certifying that the runoff from both facilities is routed into their respective treatment systems. It is possible that the requirements to obtain IGP coverage should not have been included in the CAOs. However, since they were included and the documents were signed by both parties, then we need at least a letter to show that the issue is resolved.

### Corrective Action Plans for the NPDES Permits

A Corrective Action Plan (CAP) for each facility was required in the CAO. Mizan mentioned that you may have already sent something in response to the violations found during the inspection, but keep in mind that the inspections do not include, for example, effluent violations, which the CAO does include. So, whatever is sent to satisfy the CAP requirements of the CAO will need to meet these criteria, as outlined each CAO:

Within thirty (30) calendar days of the effective date of this Order, Respondent shall submit to ADEQ, a report detailing the corrective action the Respondent has taken to correct the previously cited violations in paragraphs 10.a, 10.b, 11.a, 11.b, and 11.c. [paragraph numbers are different in CAO LIS 16-064]. The report shall also include a stamped certification from a Professional Engineer registered in the state of Arkansas that the treatment plant is in compliance with all permit effluent limits.

If whatever was sent previously does not meet the above description, then something will have to be re-drafted and sent to ADEQ.

Let me know if you have any questions or concerns.

Thanks

Kyle Barber  
Enforcement Analyst  
Office of Water Quality  
Arkansas Department of Environmental Quality  
(501) 682-0823