



ETC Engineers & Architects, Inc.

ENGINEERS ■ ARCHITECTS ■ PLANNERS

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

April 25, 2017

Mr. Kyle Barber
Enforcement Analyst
Office of Water Quality
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

Re: City of Monticello; CAO LIS No. 16-063
Wastewater Treatment Plant – East; Permit #AR0021831

Dear Mr. Barber,

On behalf of the City of Monticello, I am responding to your email dated February 15th, 2017 regarding the above referenced subject. The CAO signed by then Mayor Zack Tucker dated August 24th, 2016 listed the following deficiencies:

1. Item 10a (Page 3 of CAO): At the time of inspection the aerator in the east-most pond was not in operation.
2. Item 10b (Page 3 of CAO): The curtain in the west pond was under the surface of the water and not operating as designed.
3. Item 11a, 11b & 11c (Page 3 & 4 of CAO): Various NPDES permit violations.
4. Item 12 (Page 4 of CAO): Requirement of NPDES Industrial Stormwater General Permit.

At the request of the City of Monticello, I have reviewed all documents, response and actions related to the CAO in order for the City to be in compliance with the requirements of the CAO. My findings are as follows:

Findings on Item 1 & 2: On May 27, 2015, Mayor Zack Tucker responded to the specific violations (Item 1 & 2 above) cited in the inspection report. A copy of the Mayor's letter is attached for your review. In the letter, it is stated that both of the above violations were corrected as directed. My subsequent site inspection confirmed it.

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e-mail: etc@etcengineersinc.com



Findings on Item 3: On February 12, 2015, Mayor Zack Tucker responded to the specific violations (Item 3 above) cited in the ADEQ letter regarding permit violations. A copy of the Mayor's letter is attached for your review. In the letter the Mayor elaborates on various causes for the violations to have occurred. He then points out that the City has taken appropriate actions including hiring of a new laboratory to avoid any future violations. My subsequent review of DMR reports confirms that the City is maintaining effluent level within the permit requirements.

Findings on Item 4: The City acknowledges that the executed CAO directs the City to obtain a NPDES Industrial Stormwater General Permit. However, an earlier permit exempted the City from this requirement. Therefore, the City did not proceed with this task. My field inspection confirms that the plant is designed and build in a manner that all stormwater related runoff flows back into the treatment plant.

The CAO was executed on August 24, 2016 which is subsequent to the Mayor's letters regarding all violations. Because the corrective action took place prior to the signing of the CAO and ADEQ was notified of this fact, we did not think it was necessary to write a follow up report again. We apologies if that caused any inconvenience.

Therefore, in my opinion, since the implementation of CAO the City of Monticello – East WTP has been performing in compliance with the effluent limits of the permit and it has appropriately cured all prior violations. Please feel free to contact me if you have any questions. I can be reached at 501-375-1786.

Sincerely,

Mizan Rahman, PE
Sr. Engineer/President

CC: Mayor David Anderson, City of Monticello





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April 25, 2017

Mr. Kyle Barber
Enforcement Analyst
Office of Water Quality
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

Re: City of Monticello; CAO LIS No. 16-064
Wastewater Treatment Plant – West; Permit #AR0021822

Dear Mr. Barber,

On behalf of the City of Monticello, I am responding to your email dated February 15th, 2017 regarding the above referenced subject. The CAO signed by then Mayor Zack Tucker dated August 24th, 2016 listed the following deficiencies:

1. Item 11a (Page 3 of CAO): At the time of inspection the totalizing flowmeter was not in operation.
2. Item 11b (Page 3 of CAO): The staff gage was broken and could not be read to make a calibration check.
3. Item 12a, 12b & 12c (Page 3 & 4 of CAO): NPDES permit violations.
4. Item 13 (Page 4 of CAO): NPDES renewal application was not submitted within the required time.
5. Item 14 (Page 4 of CAO): Requirement of NPDES Industrial Stormwater General Permit.

At the request of the City of Monticello, I have reviewed all documents, response and actions related to the CAO in order for the City to be in compliance with the requirements of the CAO. My findings are as follows:

Findings on Item 1 & 2: On May 27, 2015, Mayor Zack Tucker responded to the specific violations (Item 1 & 2 above) cited in the inspection report. A copy of the Mayor's letter is attached for your review. In the letter, it is stated that both of the

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■ e-mail: etc@etcengineersinc.com ■



above violations were corrected as directed. My subsequent site inspection confirmed it.

Findings on Item 3: On February 12, 2015, Mayor Zack Tucker responded to the specific violations (Item 3 above) cited in the ADEQ letter regarding several permit violations. A copy of the Mayor's letter is attached for your review. In the letter the Mayor elaborates on various causes for the violations to have occurred. He then points out that the City has taken appropriate actions including hiring of a new laboratory to avoid any future violations. My subsequent review of DMR reports confirms that the City is maintaining effluent level within the permit requirements.


Findings on Item 4: The City acknowledges that the renewal permit application was submitted later than the permit requirement. The primary reason for the late submittal was due to various internal staff issues and several untimely changes in the city administration.

Findings on Item 5: The City acknowledges that the executed CAO directs the City to obtain a NPDES Industrial Stormwater General Permit. However, an earlier permit exempted the City from this requirement. Therefore, the City did not proceed with this task. My field inspection confirms that the plant is designed and build in a manner that all stormwater related runoff flows back into the treatment plant.

The CAO was executed on August 24, 2016 which is subsequent to the Mayor's letters regarding all violations. Because the corrective action took place prior to the signing of the CAO and ADEQ was notified of this fact, we did not think it was necessary to write a follow up report again. We apologies if that caused any inconvenience.

Therefore, in my opinion, since the implementation of CAO the City of Monticello - West WTP has been performing in compliance with the effluent limits of the permit and it has appropriately cured all prior violations. Please feel free to contact me if you have any questions. I can be reached at 501-375-1786.

Sincerely,


Mizan Rahman, PE
Sr. Engineer/President



CC: Mayor David Anderson, City of Monticello

CITY COUNCIL
CEDRIC LEONARD
AL PEER
CAROLYN BROWN
CLAUDIA HARTNESS
RAYMOND HUBBARD
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TIM CHASE
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CITY OF MONTICELLO, ARK
FOUNDED 1849

MAYOR
ZACKERY TUCKER
CLERK
ANDREA CHAMBERS
CITY ATTORNEY
WHIT BARTON

21822
WEST PLANT

Ms. Gena Porter
Enforcement Analyst
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

DELIVERED FEB 12 2015

ANS'D FEB 12 2015

Re: Your Letter Dated January 6, 2015

Dear Ms. Porter,

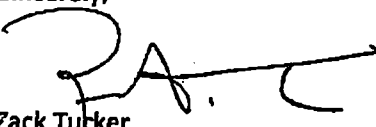
In response to your letter dated January 6, 2015 with regards to the City of Monticello Waste Water Treatment Plant permit violations, we are submitting the attached responses. The attached documents address the permit violations of April 2014.

In your letter you also enquired about the missing DMR of October and November 2014. We acknowledge that those documents apparently were not submitted by our consultants and testing laboratory. Since then we have retained a new consultant and testing laboratory in order to eliminate such unwarranted situations. Currently we are in the process of finding/recreating these two DMR reports. We will endeavor to submit these documents as promptly as possible.

The current Responsible official has been changed to the current Mayor, Mr. Zack Tucker. A completed signatory authorization form was sent to ADEQ earlier.

Please feel free to contact me if you have any questions or clarifications.

Sincerely,


Zack Tucker
Mayor

CITY COUNCIL

CEDRIC LEONARD
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CITY OF MONTICELLO, ARK

FOUNDED 1848

MAYOR
ZACKERY TUCKER

CLERK
ANDREA CHAMBERS

CITY ATTORNEY
WHIT BARTON

ATTACHMENT 1

Re: Monticello WWTP – West
Permit #AR0021822 Discharge Number 001-A
Effluent Violation NCR
DMR Period End Date: 4/30/2014

Description of Violation – There were two violations according to the DMR: (1) Reported maximum pH of 9.2 exceeded the permit value of 9.00. (2) Reported Monthly Average Total Suspended Solids of 125.7 mg/l exceeded the permit value of 90 mg/l.

Reason for the Violations – On July 1, 2014, Ms. Andrea Chambers City Clerk/Treasurer stated that the primary reason for the pH violation was due to an untrained staff member's inability to properly calibrate the pH instrument prior to measuring the pH value. After recent discussion with the same staff member it was concluded that the pH reading was most likely incorrect.

In the same letter Ms. Chambers stated that the primary reason for the violation of TSS was adverse weather conditions. The attached rainfall information indicates that during the month of April 2014 total precipitation was 6.29 inches which far exceeds (30%) the normal precipitation of 4.8 inches (See attached rainfall data for Monticello for the Month of April 2014). During such wet weather conditions the turbidity of the inflow to the WWTP does increase for various reasons. In addition we noticed that all samples were grab samples rather than the required composite samples. Grab samples will most likely indicate higher TSS value.

Duration of Violation – Ms. Chambers' letter stated that the violation took place during the month of April, 2014. After further investigating we concur that the violation may have occurred during the entire month of April. The regular plant operator was unable to work the entire month and therefore the stand in staff performed all duties including testing, collecting samples etc. for the month.

Corrective Actions to Eliminate Violations: The regular operator is back on normal schedule and as such will be able to monitor appropriately. The City is also in the process of training additional staff to stand in for the operator if and when it becomes necessary.

We are instructing our current testing lab to strictly comply with the sampling and testing requirements of the permit.

City staffs are being instructed to strictly comply with the permit requirements. Therefore if the effluent parameters exceeds the permit value no discharge should be made.

Expected Compliance Date – We are committed to bring the WWTP discharges under compliance immediately. We believe that the plant is in compliance currently.

ATTACHMENT 2

Re: Monticello WWTP – East
Permit #AR0021831 Discharge Number 001-A
Effluent Violation NCR
DMR Period End Date: 4/30/2014 & 3/31/2013

Description of Violation – There were two violations according to the DMR. (1) Reported maximum pH of 9.3 exceeded the permit value of 9.00. (2) Reported Monthly Average Copper (Total Recoverable) of 23 mg/l exceeded the permit value of 19 mg/l.

Reason for the Violations – On July 1, 2014, Ms. Andrea Chambers City Clerk/Treasurer stated that the primary reason for the pH violation was due to an untrained staff member's inability to properly calibrate the pH instrument prior to measuring the pH value. After recent discussion with the same staff member it was concluded that the pH reading was most likely incorrect.

Our records indicate that there was no discharge during the month of March 2014. We have not been able to thoroughly research the DMR since the consultant and the laboratory that performed the test and submitted the DMR is no longer working for the City. However we will continue to investigate the issue and inform you of our findings. In this regard we have also started to investigate the pre-treatment effluent quality to determine the source of the effluent parameter.

Duration of Violation – Ms. Chambers' letter stated that the violation took place during the month of April, 2014. After further investigating we concur that the violation may have occurred during the entire month of April. The regular plant operator was unable to work the entire month and therefore the stand in staff performed all duties including testing, collecting samples etc. for the month.

Corrective Actions to Eliminate Violations: The regular operator is back on normal schedule and as such will be able to monitor appropriately. The City is also in the process of training additional staff to stand in for the operator if and when it becomes necessary.

We are instructing our current testing lab to strictly comply with the sampling and testing requirements of the permit.

City staffs are being instructed to strictly comply with the permit requirements. Therefore if the effluent parameters exceeds the permit value no discharge should be made.

Expected Compliance Date – We are committed to bring the WWTP discharges under compliance

Temperature - Precipitation - Sunshine - Snowfall

US Climate Data on **19**

[Monthly](#)
[Daily](#)
[History](#)
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2014
 April

Weather history Monticello april 2014

| Day | High (°F) | Low (°F) | Precip. (inch) | Snow (inch) | Snow depth (inch) |
|-------------|--------------|-------------|-------------------|----------------|-------------------------|
| 1 apr 2014 | 75.9 | 50.0 | 0.00 | 0.00 | 0.00 |
| 2 apr 2014 | 77.0 | 64.0 | 0.01 | 0.00 | 0.00 |
| 3 apr 2014 | 84.9 | 68.0 | 0.01 | 0.00 | 0.00 |
| 4 apr 2014 | 73.0 | 48.9 | 0.43 | 0.00 | 0.00 |
| 5 apr 2014 | 55.9 | 44.1 | T | 0.00 | 0.00 |
| 6 apr 2014 | 51.1 | 46.9 | 1.52 | 0.00 | 0.00 |
| 7 apr 2014 | 62.0 | 48.9 | 0.05 | - | 0.00 |
| 8 apr 2014 | 59.0 | 43.0 | 0.39 | - | 0.00 |
| 9 apr 2014 | 70.0 | 37.9 | 0.00 | - | 0.00 |
| 10 apr 2014 | 80.1 | 48.9 | 0.00 | 0.00 | 0.00 |
| 11 apr 2014 | 79.0 | 57.0 | 0.00 | 0.00 | 0.00 |
| 12 apr 2014 | 78.1 | 57.0 | 0.00 | 0.00 | 0.00 |
| 13 apr 2014 | 78.1 | 64.9 | 0.19 | 0.00 | 0.00 |
| 14 apr 2014 | 69.1 | 49.0 | 1.14 | 0.00 | 0.00 |
| 15 apr 2014 | 55.0 | 37.0 | 0.00 | 0.00 | 0.00 |
| 16 apr 2014 | 62.1 | 35.1 | 0.00 | 0.00 | 0.00 |
| 17 apr 2014 | 68.0 | 37.9 | T | 0.00 | 0.00 |
| 18 apr 2014 | 75.0 | 53.1 | T | 0.00 | 0.00 |
| 19 apr 2014 | 79.0 | 48.9 | 0.00 | 0.00 | 0.00 |
| 20 apr 2014 | 82.0 | 50.0 | 0.00 | 0.00 | 0.00 |
| 21 apr 2014 | 82.0 | 61.0 | 0.44 | 0.00 | 0.00 |
| 22 apr 2014 | 78.1 | 51.0 | 0.87 | 0.00 | 0.00 |
| 23 apr 2014 | 78.0 | 48.9 | T | - | 0.00 |
| 24 apr 2014 | 82.0 | 54.0 | 0.58 | 0.00 | 0.00 |
| 25 apr 2014 | 75.0 | 51.1 | 0.00 | 0.00 | 0.00 |
| 26 apr 2014 | 84.9 | 46.9 | 0.00 | - | 0.00 |
| 27 apr 2014 | 84.9 | 69.1 | 0.20 | 0.00 | 0.00 |
| 28 apr 2014 | 80.1 | 57.0 | 0.46 | 0.00 | 0.00 |
| 29 apr 2014 | 71.1 | 52.0 | T | 0.00 | 0.00 |
| 30 apr 2014 | 57.9 | 49.0 | 0.00 | 0.00 | 0.00 |

T = Trace

Past weather Monticello - april 2014

| | |
|---------------------------|------------------------------|
| Average high temperature: | 73.0°F (normal: 74°F) |
| Average low temperature: | 50.7°F (normal: 52°F) |
| Average temperature: | 61.8°F (normal: 63°F) |
| Total Precipitation: | 6.29 inch (normal: 4.8 inch) |
| Total snowfall: | 0 inch |
| Highest max temperature: | 84.9°F |
| Lowest max temperature: | 51.1°F |
| Highest min temperature: | 69.1°F |
| Lowest min temperature: | 35.1°F |

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Tammy Kelly

From: Tammy Kelly <monttammyk@att.net>
Sent: Tuesday, January 13, 2015 6:23 AM
To: 'Porter, Gina'
Subject: October and November DMRs

Gina, I mailed these DMRs back in each month I received them. I still have copies I keep for my files if you want me to either mail or email them to you. Please advise.

Tammy Kelly
Accounts Payable Specialist
Human Resources & DMR Clerk

City of Monticello, AR
203 W Gaines Street
PO Box 505
Monticello, AR 71655

w.870.367.4400

monttammyk@att.net

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OFFICE OF THE MAYOR

MONTICELLO, ARKANSAS

FOUNDED 1849

MAYOR
ZACKERY TUCKER
CLERK
ANDREA CHAMBERS
CITY ATTORNEY
WHIT BARTON

May 27, 2015

Mr. Michael D. Young
District 8 Field Inspector
Water Division
Ar. Dept. of Environmental Quality
5301 Nortshore Drive
North Little Rock, AR 72118

RE: Response to Your Letter Regarding Wastewater Plant Inspection

Dear Mr. Young,

We received your letter dated April 10, 2015 regarding your findings from your Compliance Evaluation Inspection of March 10, 2015. Although we have completed many of the corrective actions there are still a few left to be completed. Hence the delay in sending you our final response. We apologize for any inconvenience that may have caused. I am providing an itemized response below.

East Plant:

- Finding #3:** One of the aerator in the easternmost pond was out of service during the inspection. This is a violation of Part III. (B.) (1.) (A.).
Corrective action: The aerator was fixed and is working currently.
- Finding #4:** The curtain in the west pond was under the surface of the water. The curtain needs to be raised to operate efficiently. This is a violation of permit condition Part III. (B.) (1.) (A.).
Corrective action: The curtain has been raised as recommended.
- Comments on flow:** Flow checks need to be performed periodically to ensure the meter is operating properly.
Corrective action: We have implemented the practice and will continue such periodic performance in order to check flow meter's performance.
- Violation #1:** Pipe discharges water that is collected in the bar screen garbage collection area to a ditch that is not routed to the WWTP.
Corrective action: We have engaged our engineer to look into this situation and develop and implement a corrective plan as soon as practicable.

Violation #2: The East Plant is an identified sector of industrial activity that has been identified for coverage by the ADEQ for the Stormwater Industrial General Permit (IGP). Currently the facility is operating without a permit.

Corrective action: We have engaged our engineer to obtain the necessary permit from ADEQ.

West Plant:

5. **Finding #1:** The flow meter was not in operation at the time of inspection. This is a violation of permit condition Part III. (C.) (2.).

Corrective action: The flow meter is now operational and is working properly.

6. **Finding #2:** The staff gauge was broken and could not be read to make calibration check. This is a violation of permit condition Part III. (C.) (2.).

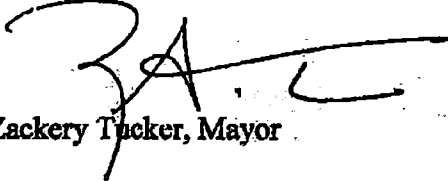
Corrective action: Has been corrected.

7. **Finding #5:** Influent records indicate that removal of BOD5 is not 85%. This is a violation of permit condition Part II. (2.).

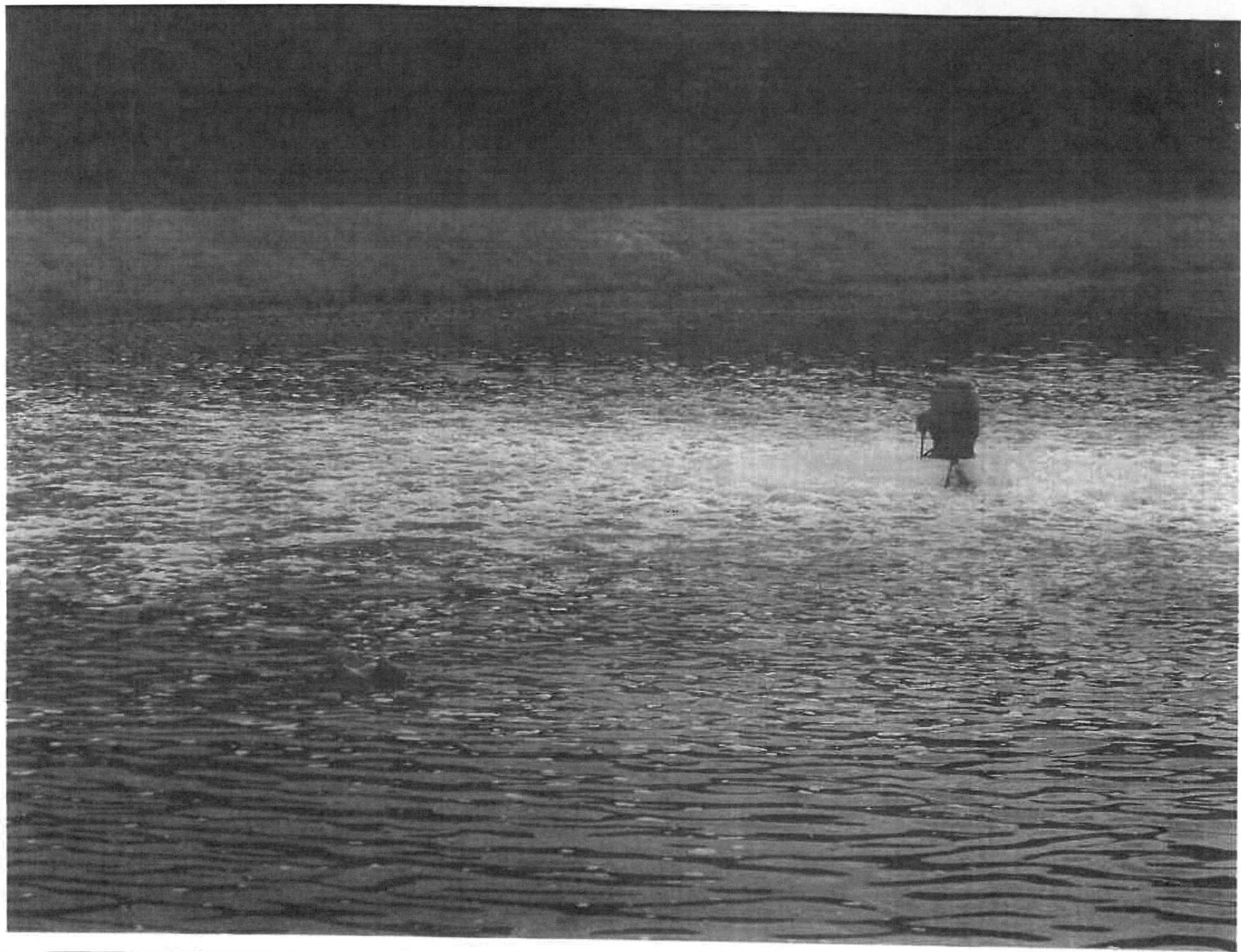
Corrective action: We will request our current Contract Lab to collect and analyze influent BOD samples to determine treatment plant performance and/or collection system issues.

We sincerely hope that you will allow us some additional time to complete the remaining few corrective actions. We are striving to complete all corrective actions within the next 90 days. Please feel free to call me if you have any questions or need additional clarifications.

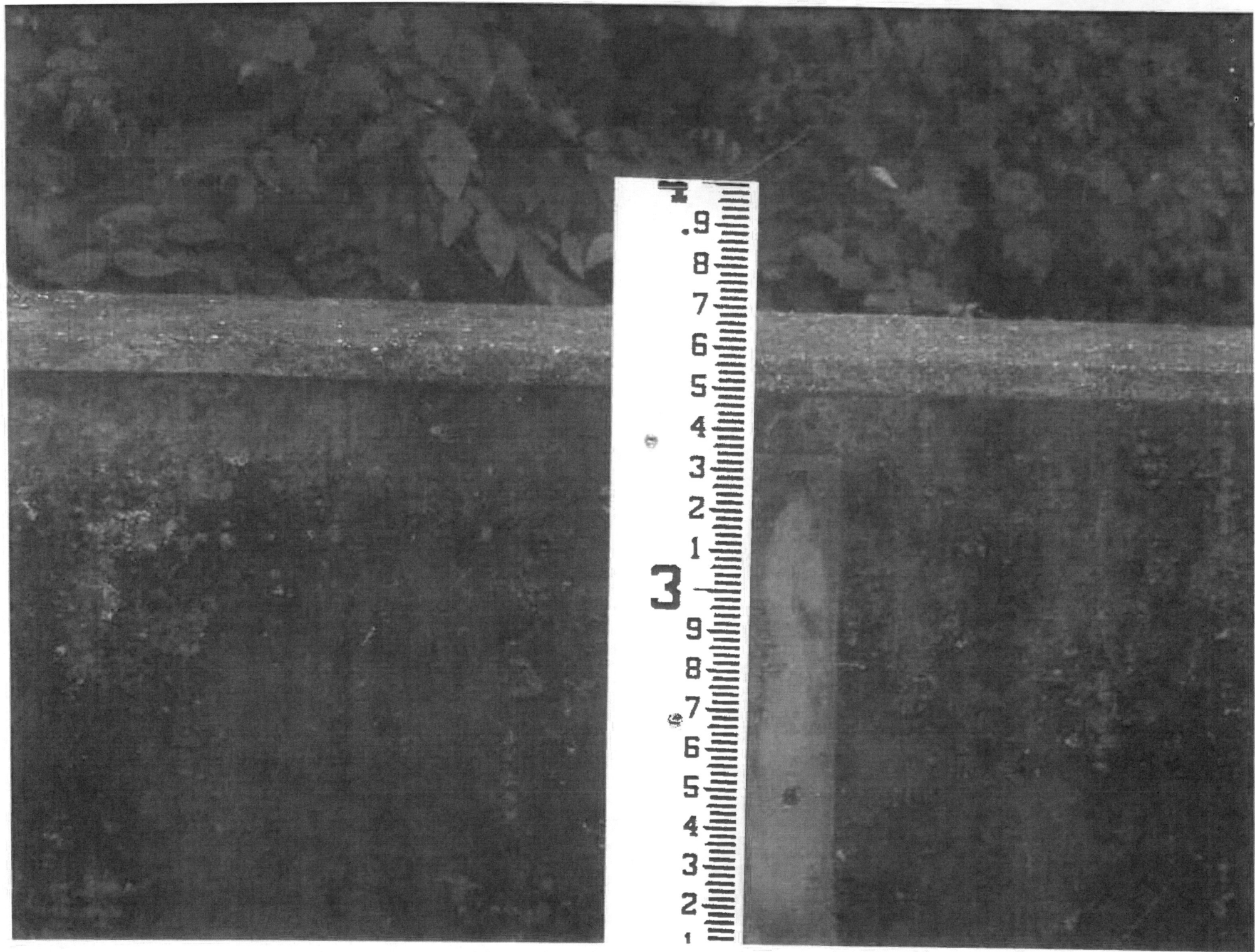
Yours for the better Monticello,



Zackery Tucker, Mayor







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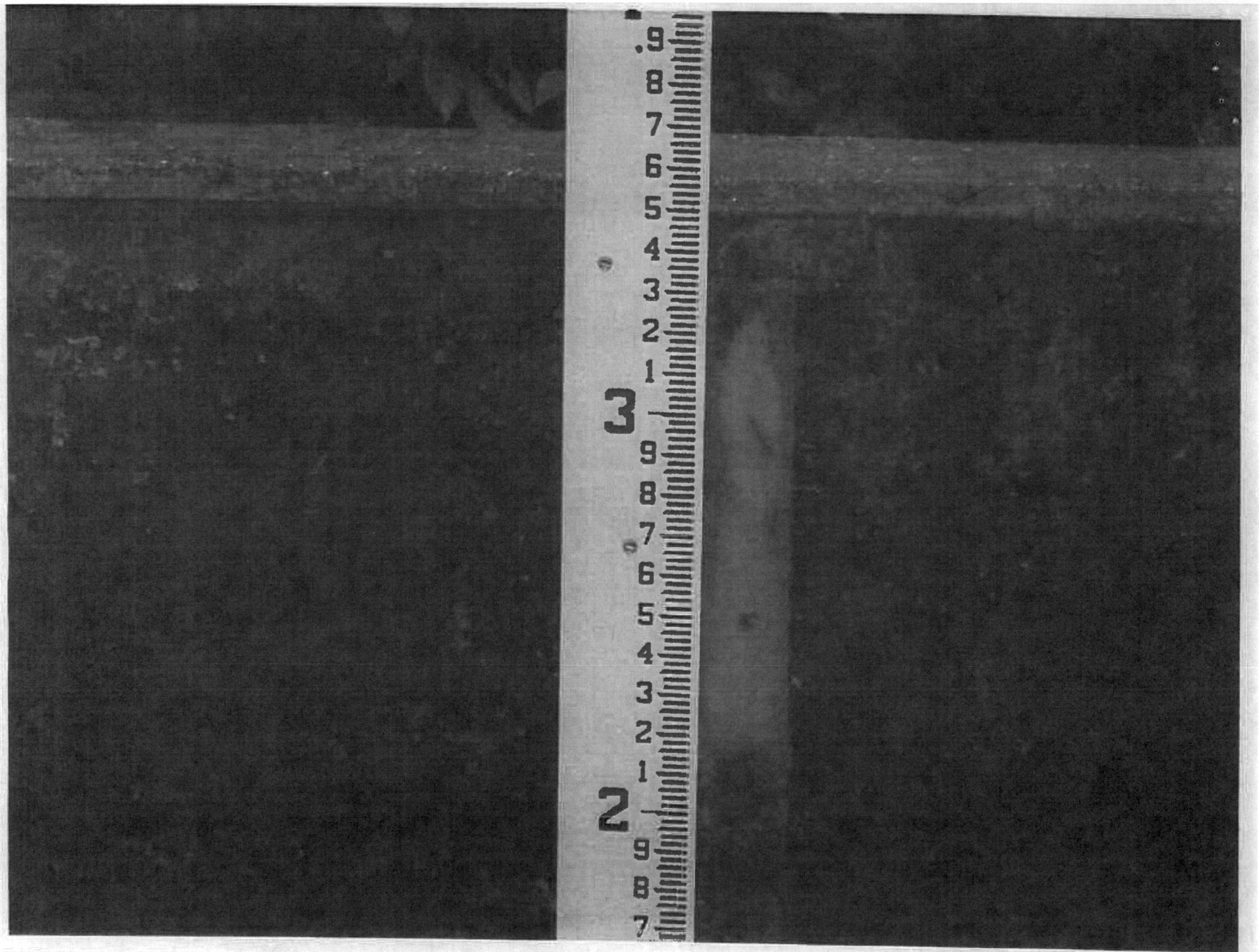
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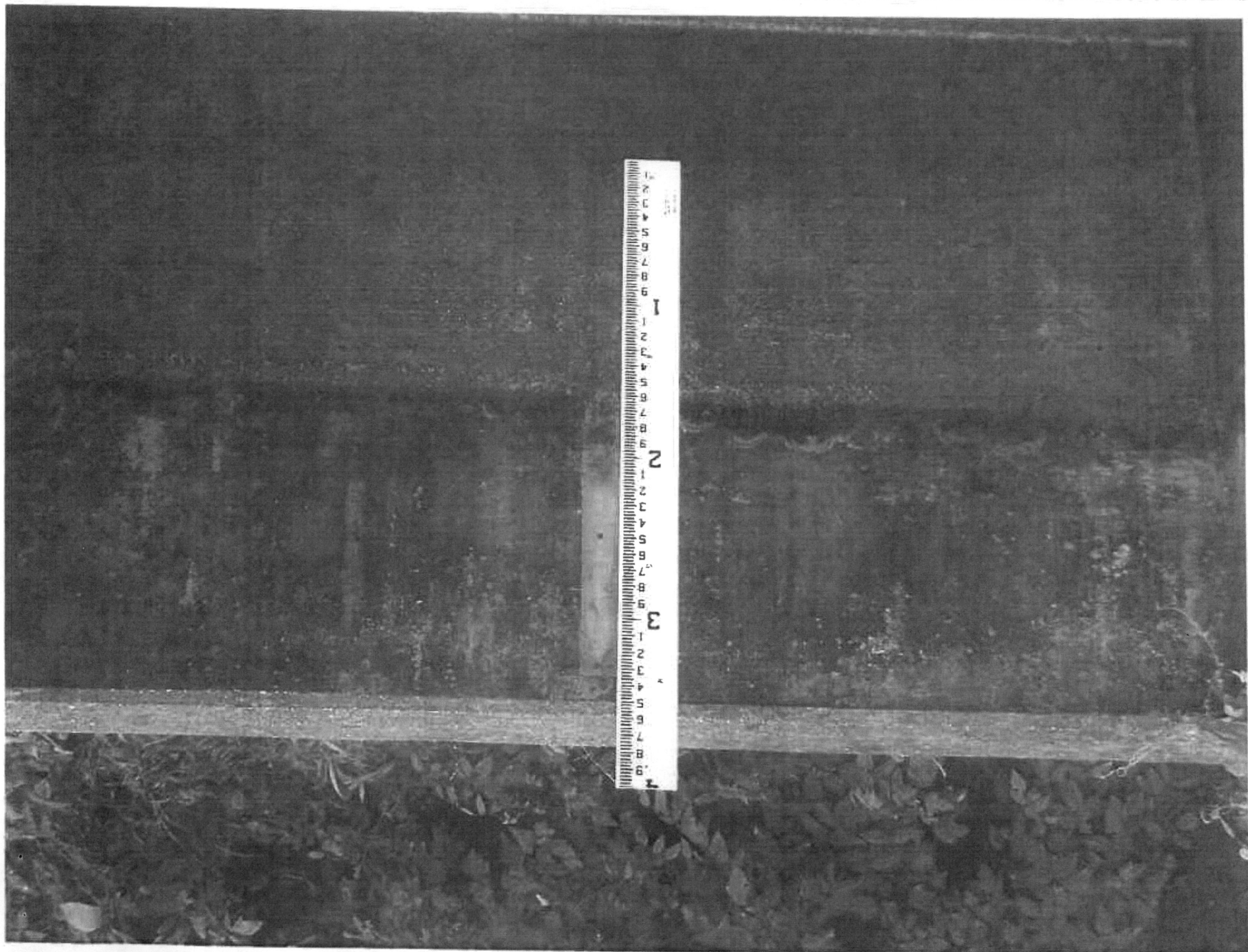
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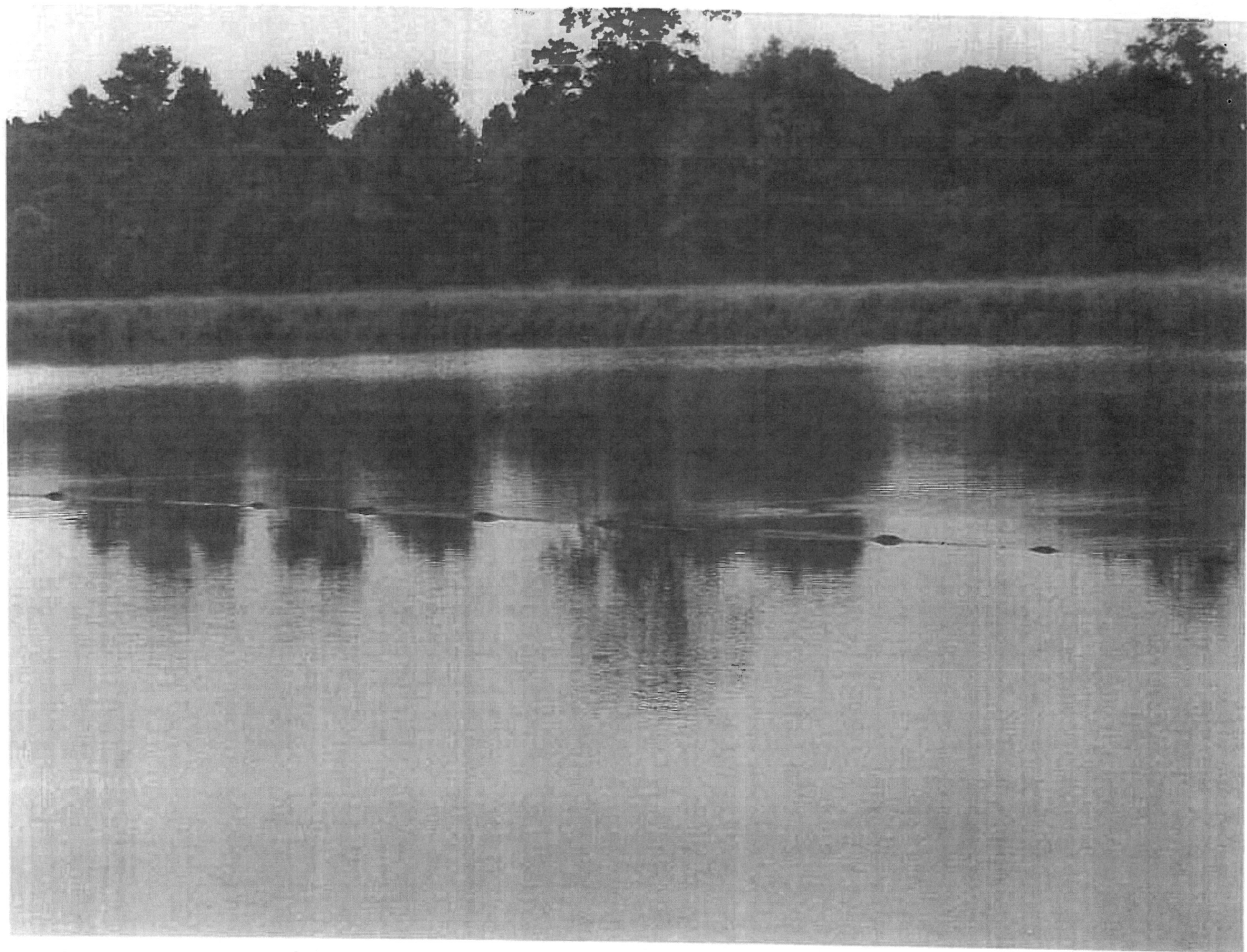
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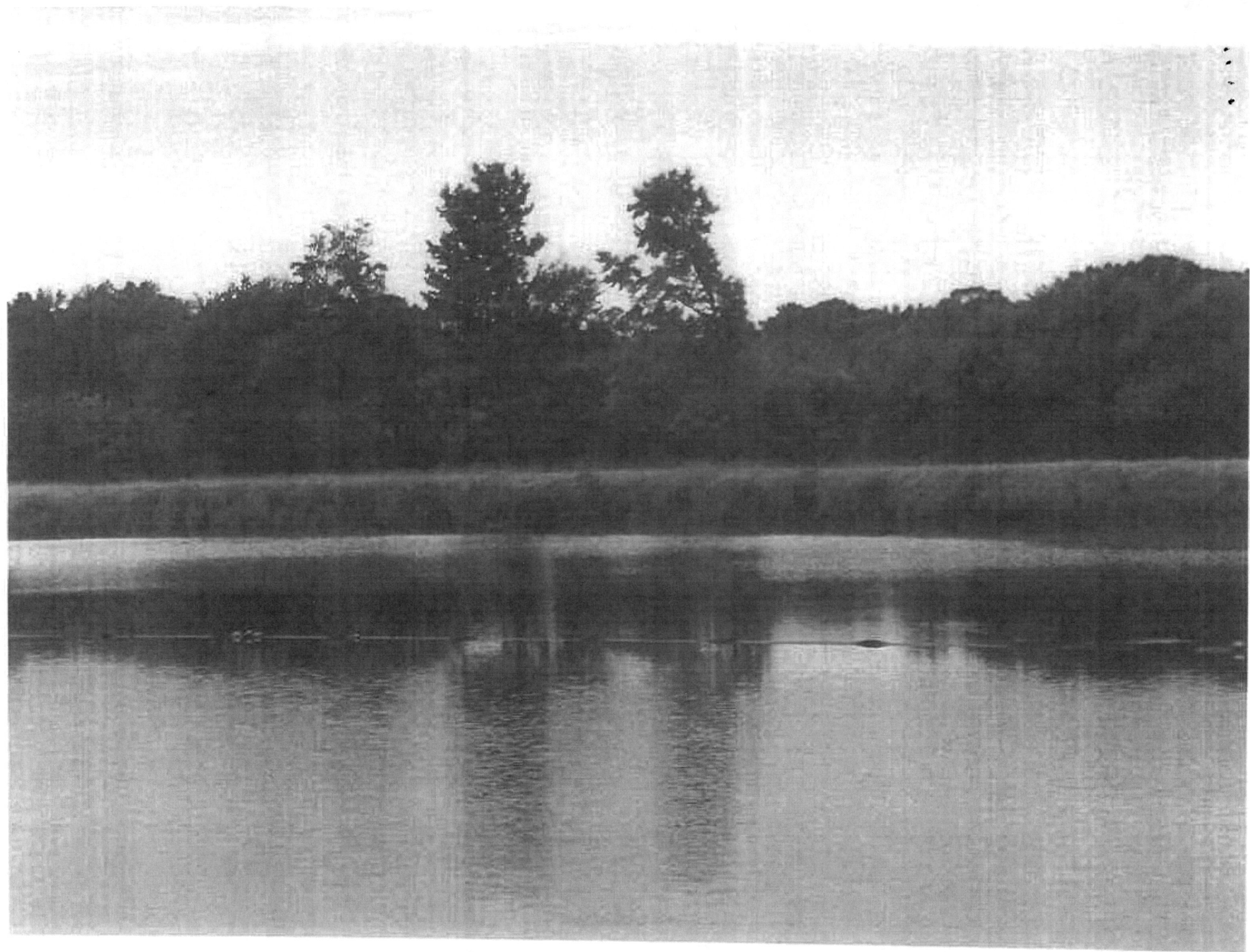
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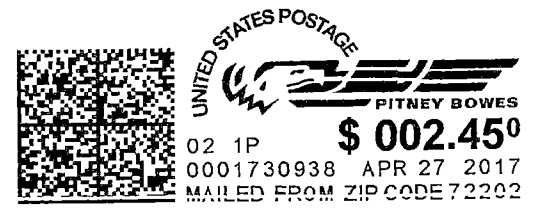








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Mr. Kyle Barber
Enforcement Analyst
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