



**A R K A N S A S**  
 Department of Environmental Quality

November 14, 2017

Honorable David Anderson  
 Mayor, City of Monticello  
 P.O. Box 505  
 Monticello, AR 71657

email: [montmayor@att.net](mailto:montmayor@att.net)

**RE: NPDES Permit No: AR0021822 and AR0021831, AFINs: 22-00037 and 22-00379  
 Corrective Action Plan Response**

Dear Mayor Anderson,

The Department received and reviewed the Corrective Action Plan (CAP) dated November 10, 2017 for the above referenced facilities. Further information is required:

- The City of Monticello shall submit additional corrective actions to mitigate the following effluent violations and achieve compliance with the permitted effluent limitations:

**AR0021831 – City of Monticello – East Plant**

DMR End Date	Discharge Number	Parameter Description	Reported Value	Permit Limit	% Violation
05/31/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	1249	1000	25%
05/31/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	15500	2000	675%
06/30/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	15121	1000	1,412%
06/30/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	24200	2000	1,110%

**AR0021822 – City of Monticello – West Plant**

DMR End Date	Discharge Number	Parameter Description	Reported Value	Permit Limit	% Violation
03/31/2015	TX1-Q	Whole effluent toxicity (DLYAVMIN, %)	0	45	100%
03/31/2015	TX1-Q	Whole effluent toxicity (7 DA MIN, %)	0	45	100%
04/30/2015	001-A	Solids, total suspended (MO AVG, mg/L)	99	90	10%
04/30/2015	001-A	Coliform, fecal general (30DA GEO, #/100mL)	392	200	96%
04/30/2015	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	420	400	5%
07/31/2015	001-A	Coliform, fecal general (30DA GEO, #/100mL)	586	200	193%
07/31/2015	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	700	400	75%
11/30/2015	001-A	Solids, total suspended (7 DA AVG, mg/L)	142	135	5%

12/31/2015	TX1-Q	Whole effluent toxicity (DLYAVMIN, %)	0	45	100%
12/31/2015	TX1-Q	Whole effluent toxicity (7 DA MIN, %)	0	45	100%
04/30/2016	001-A	Solids, total suspended (MO AVG, mg/L)	92.5	90	3%
06/30/2016	TX1-Q	Whole effluent toxicity (DLYAVMIN, %)	0	45	100%
06/30/2016	TX1-Q	Whole effluent toxicity (7 DA MIN, %)	0	45	100%
12/31/2016	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	9200	2000	360%
04/30/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	1448	200	624%
04/30/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	9800	400	2,350%
05/31/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	3263	200	1,532%
05/31/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	24200	400	5,950%
06/30/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	9154	200	4,477%
06/30/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	24200	400	5,950%
08/31/2017	001-A	Coliform, fecal general (30DA GEO, #/100mL)	2132	200	966%
08/31/2017	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	2910	400	628%

- The City of Monticello shall submit corrective actions to address the inflow and infiltration issues in the sewer lines.
- The City of Monticello shall submit a milestone schedule of all corrective actions that includes a reasonable expected final date of compliance.
- They City of Monticello shall submit monthly progress reports detailing the progress made towards achieving final compliance with the Permits. The first monthly progress report will be due **January 1, 2018** and shall include certificates of Sampling Techniques and Procedures training and certify the Hydrographic Controlled Release Systems have been installed and are working properly at both the East and West Plants.

Please take notice that any violation of your NPDES Permits is subject to further enforcement action which may include the assessment of an additional civil penalty by this Department.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0639 or by e-mail at [taylor@adeq.state.ar.us](mailto:taylor@adeq.state.ar.us).

Sincerely,



Bailey Taylor  
Enforcement Analyst  
Office of Water Quality

cc: Mizan Rahman, P.E., ETC Engineers & Architects, Inc. ([mizanr@etcengineersinc.com](mailto:mizanr@etcengineersinc.com))  
Andrea Chambers, Clerk/Treasurer, City of Monticello ([montcity@att.net](mailto:montcity@att.net))