



February 12, 2019

**CERTIFIED MAIL: 9489 0090 0027 6060 6316 48**

Honorable Paige Chase, Mayor  
City of Monticello  
P.O. Box 505  
Monticello, AR 71657

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

**RE: NPDES Permit No. AR0021831 and AR0021822; AFIN: 22-00379 and 22-00037  
CAP Response**

Dear Mayor Chase:

The Department received and reviewed the Corrective Action Plan (CAP) dated January 25, 2019 for the above referenced facilities. The CAP was deemed inadequate with the following comments:

- Please provide the details and timeline for expanding the sewer lagoons that was referenced in the non-compliance report dated December 10, 2018.
- The Department requests a proposal for potential disinfection treatment installation options for both the East and West wastewater treatment facilities.
- The sludge depth needs to be measured to ensure there is adequate volume and retention time in the ponds for proper wastewater treatment.
  - To measure the sludge depth you may:
    - Use a “core-sample” type tool made of a clear plastic tube that penetrates to the pond bottom, closes, and directly reveals the sludge depth; or
    - Measure the depth of the water down to the top of the sludge and note the freeboard in the pond when the measurements are taken.
  - The depth should be measured at several places so that a good average depth may be determined for each cell. At a minimum, locations near each corner of the cell, near the mid-point of each side of the cell, and near the center of each cell should be measured.

The maximum total depth of each cell of the must be included with the submitted information. The maximum total depth is the height from the bottom of the pond to top of the levee. Please submit the results of the sludge depth survey by **May 3, 2019**. The information will be reviewed to determine if removal of the sludge is necessary.

As a reminder, the below listed items are still outstanding per the Order and Agreement Section of CAO LIS 18-066 and LIS 16-064-001:

- Certification that the Automated Hydrographic Controlled Release System has been installed and is working properly for **AR0021831**.
- Final compliance with the effluent limitations of AR0021822 and AR0021831 was to be achieved by December 31, 2018. A final compliance date extension request must be submitted immediately.
- Your next quarterly progress report will be due **April 15, 2019**.
- A complete Sewer System Evaluation Study (SSES) must be submitted by **September 10, 2019** and shall include the following:
  - smoke testing performed in all areas of the collection system, beginning with highest priority areas;
  - televising performed of lines in areas deemed necessary based on smoke testing in order to locate leaks and to determine method of repair;
  - a plan to address deficiencies through rehabilitation, repair, or replacement;
  - a manhole inspection program, beginning in highest priority area; and
  - Recommended method of repair and develop a cost estimate for such.

If you have any questions regarding this matter please contact me at 501-682-0639 or [bailey.taylor@adeq.state.ar.us](mailto:bailey.taylor@adeq.state.ar.us).

Sincerely,



Bailey Taylor  
Enforcement Coordinator  
Office of Water Quality

cc: Mizan Rahman, P.E., ETC Engineers & Architects, Inc. ([mizanr@etcengineersinc.com](mailto:mizanr@etcengineersinc.com))

Previous Corrective Action Plans:

April 25, 2017:

[https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021822\\_Combpliance%20Update\\_20170427.pdf](https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021822_Combpliance%20Update_20170427.pdf)

Inadequate Response February 15, 2017:

[https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021822\\_CAO%20Compliance%20Schedule%20Email\\_20170214.pdf](https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021822_CAO%20Compliance%20Schedule%20Email_20170214.pdf)

November 10, 2017

[https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021831\\_CAP\\_20171110.pdf](https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021831_CAP_20171110.pdf)

Inadequate Response November 14, 2017:

[https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021831\\_CAP%20Response\\_20171114.pdf](https://www.adeq.state.ar.us/downloads/WebDatabases/PermitsOnline/NPDES/EnforcementReports/AR0021831_CAP%20Response_20171114.pdf)