



ETC Engineers & Architects, Inc.

ENGINEERS ■ ARCHITECTS ■ PLANNERS

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

December 29, 2018

Ms. Bailey Taylor
Enforcement Analyst
Office of Water Quality
ADEQ
5301 Northshore Drive
North Little Rock, AR 72118

Re: City of Monticello
NPDES Permit # AR0021822 & AR002183
Response to Letter Dated Nov. 14, 2017

Dear Ms. Taylor,

On behalf of the City of Monticello and Mayor Anderson, I am hereby responding to your letter dated November 14, 2017, requesting additional information in reference to the City's response on the Corrective Action Plan.

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

Response: The violations listed are in 3 parameters – Fecal Coliform, Whole Effluent Toxicity and Suspended Solid. Largest incidents of violations are for Fecal Coliform. In our effort to determine the cause of the violations we were unable to reach a definitive position. We will continue to make further efforts to determine the cause of the violations. We will also study all current and future sampling results in order to understand the causes for such wide fluctuations in the Fecal Coliform count. If these types of violations continue and we are unable to determine specific causes for such violations, we will propose additional treatment to control such violations.

Your Comment: The City of Monticello shall submit corrective actions to address the inflow and infiltration issues in the sewer line.

Response: As you know, both of the City's WWTP are capable of holding large peak flows and as such it is able to manage certain amount of I&I without causing effluent violations. It is the intent of the City to investigate the extent of I&I within its collection system and to develop a plan of mitigation in the next six months.

BUILDING A BETTER WORLD

■ e-mail: etc@etcengineersinc.com ■



Your Comment: The City of Monticello shall submit a milestone schedule of all corrective actions that include a reasonable expected final date of compliance.

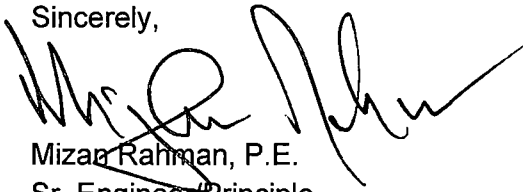
Response: Please see attached milestone schedule.

Your Comment: The City of Monticello shall submit monthly progress reports detailing the progress made towards achieving final compliance with the permits.

Response: The monthly progress report is attached.

Please feel free to get in touch with me if you need additional clarification.

Sincerely,

A handwritten signature in black ink, appearing to read 'Mizan Rahman', written over a faint, illegible typed name.

Mizan Rahman, P.E.
Sr. Engineer/Principle

CC: Mayor David Anderson, City of Monticello

MILESTONE SCHEDULE OF ALL CORRECTIVE ACTIONS

| CAP ITEMS | 4th Qtr - 2017 | 1st Qtr - 2018 | 2nd Qtr - 2018 | 3rd Qtr - 2018 | 4th Qtr - 2018 |
|---|----------------|----------------|----------------|----------------|----------------|
| Operation and Maintenance Manual for sampling procedures | <-----> | | | | |
| Automated Hydrographic Controlled Effluent Release System | <-----> | | | | |
| Perform Initial Study to Determine Extent of I&I in the Collection System | | <-----> | | | |
| Contingency Plan for power failures at Each Pump Station | <-----> | | | | |
| Determine Causes of Effluent Violations | | <-----> | | | |

City of Monticello WWTP

Monthly Progress Report – December 2017 Compliance Status of Corrective Actions

CAP #1: Staff Training on Sampling Techniques & Procedures:

Originally the City had arranged to have Arkansas Analytical, Inc. to conduct a multiday workshop on sampling techniques and procedures. However, this has not worked out. The City has now decided to send the staff to the Camden Training Academy. The Camden Academy has a 12-hour training course on the topic that also include training on process control. WWTP staff will be sent there on the first available course.

CAP #2: Install Automatic Hydrograph Control Effluent Release System at the West Plant:

All equipment and instruments have been installed with the exception of the control system which has not been received yet from the factory. It is anticipated that the equipment will be arriving within the next two weeks. We expect the system to be operational by the end of the month.

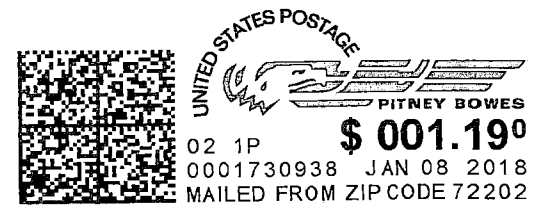
CAP #3: Contingency Plan for Power Failures at all Pump Stations:

The City has installed "Quick Connect" electrical connectors to hook up with a portable generator at the following 4 pump station.

1. Huckleberry Lane
2. Hood Packing
3. Bankston Hall
4. Gibson Center

The installation of the "Quick Connect" electrical connectors will continue till all pump stations are appropriately equipped.

ETC Engineers & Architects Inc
1510 S. BROADWAY
LR, AR 72202



Ms. BAILEY TAYLOR
Enforcement Analyst
Office of Water Quality
ADEQ
5301 Northshore Dr.
North Little Rock AR 72118

