

## Barber, Kyle

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**From:** Mizan Rahman <mizanr@etcengineersinc.com>  
**Sent:** Thursday, April 27, 2017 2:27 PM  
**To:** Barber, Kyle  
**Cc:** Mizan Rahman  
**Subject:** [BULK] Monticello - East Plant CAO  
**Attachments:** Letter regarding East.pdf; ATT00004.htm; Letter 1.pdf; ATT00005.htm; Letter 2.pdf; ATT00006.htm

Kyle,

This is the letter in regards to East Plant. The attachments are the same. Hope this puts the CAO issues to bed. Please give me a call if you need clarification.

Regards,  
*Mizan*

Mizan Rahman, P.E.  
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ENGINEERS ■ ARCHITECTS ■ PLANNERS

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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. 16-063  
Wastewater Treatment Plant – East; Permit #AR0021831

Dear Mr. Barber,

On behalf of the City of Monticello, I am responding to your email dated February 15<sup>th</sup>, 2017 regarding the above referenced subject. The CAO signed by then Mayor Zack Tucker dated August 24<sup>th</sup>, 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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*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

