



April 16, 2019

**CERTIFIED MAIL: 9489 0090 0027 6060 6349 53**

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  
Response Letter**

Dear Mayor Chase:

The Department received and reviewed the response dated March 5, 2019 for the above referenced facilities and has the following comment:

- The Pond Sludge Survey results reveal that the East Plant has approximately 55.4%-91.9% of operating volume remaining and 28 days of retention time. The West Plant has approximately 71.1%-86.1% of operating volume remaining and 262 days of retention time (attached). 10 States Standards recommends that wastewater treatment ponds have at least 90-120 days of retention time.

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 the **East Plant (AR0021831)**.
- An extension of the final compliance date for CAOs LIS 18-066 and LIS 16-064-001 was requested in a letter dated March 5, 2019; however the City of Monticello must submit a revised milestone schedule that includes and actual final date of compliance. The revised milestone schedule should be submitted by **May 10, 2019**.
- The following progress reports have yet to be received by the Department: **October 15, 2018, January 15, 2019, and April 15, 2019**. Your next quarterly progress report will be due **July 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,

A handwritten signature in blue ink that reads "Bailey Taylor". The signature is written in a cursive style with a horizontal line above the first name.

Bailey Taylor  
Enforcement Coordinator  
Office of Water Quality

## Retention Time of Ponds with Sludge

City of Monticello - East Plant - AR0021831

ALL DIMENSIONS IN FEET (except sludge in inches)

CELL 4

Data Point	Sludge Depth (inches)
1	24.00
2	18.00
3	12.00
4	6.00
5	12.00
6	12.00
7	6.00
8	6.00
9	12.00
<b>Avg. Sludge Depth (inches)</b>	<b>12.0</b>

Required Freeboard	2.0
Pond Depth	14.300
Pond Width	940
Pond Length	1258
Design Flow (MGD)	7.200
Design Pond Operating Volume (ft <sup>3</sup> )	<b>14,544,996</b>
Actual Operating Volume (ft <sup>3</sup> )	<b>13,362,476</b>
Operating Volume (gallons)	<b>99,951,320</b>
% of Design Operating Volume Remaining	<b>91.9</b>
Retention Time (days)	<b>13.9</b>

CELL 1

Data Point	Sludge Depth (inches)
1	42.00
2	42.00
3	12.00
4	72.00
5	78.00
6	66.00
7	48.00
8	54.00
9	48.00
<b>Avg. Sludge Depth (inches)</b>	<b>51.3</b>

Required Freeboard	2.0
Pond Depth	11.600
Pond Width	500
Pond Length	500
Design Flow (MGD)	7.200
Design Pond Operating Volume (ft <sup>3</sup> )	<b>2,400,000</b>
Actual Operating Volume (ft <sup>3</sup> )	<b>1,330,556</b>
Operating Volume (gallons)	<b>9,952,556</b>
% of Design Operating Volume Remaining	<b>55.4</b>
Retention Time (days)	<b>1.4</b>

CELL 2

Data Point	Sludge Depth (inches)
1	36.00
2	36.00
3	48.00
4	42.00
5	18.00
6	12.00
7	30.00
8	30.00
9	12.00
<b>Avg. Sludge Depth (inches)</b>	<b>29.3</b>

Required Freeboard	2.0
Pond Depth	12.900
Pond Width	500
Pond Length	500
Design Flow (MGD)	7.200
Design Pond Operating Volume (ft <sup>3</sup> )	<b>2,725,000</b>
Actual Operating Volume (ft <sup>3</sup> )	<b>2,113,889</b>
Operating Volume (gallons)	<b>15,811,889</b>
% of Design Operating Volume Remaining	<b>77.6</b>
Retention Time (days)	<b>2.2</b>

CELL 3

Data Point	Sludge Depth (inches)
1	24.00
2	12.00
3	6.00
4	6.00
5	6.00
6	48.00
7	6.00
8	42.00
9	6.00
<b>Avg. Sludge Depth (inches)</b>	<b>17.3</b>

Required Freeboard	2.0
Pond Depth	11.330
Pond Width	1000
Pond Length	1350
Design Flow (MGD)	7.200
Design Pond Operating Volume (ft <sup>3</sup> )	<b>12,595,500</b>
Actual Operating Volume (ft <sup>3</sup> )	<b>10,645,500</b>
Operating Volume (gallons)	<b>79,628,340</b>
% of Design Operating Volume Remaining	<b>84.5</b>
Retention Time (days)	<b>11.1</b>

Pond cell Widths and Lengths estimated from Google Earth

**Retention Time of Ponds with Sludge**

City of Monticello - West Plant - AR0021822

ALL DIMENSIONS IN FEET (except sludge in inches)

**CELL 2**

Data Point	Sludge Depth (inches)
1	24.00
2	18.00
3	12.00
4	12.00
5	24.00
6	6.00
7	6.00
8	18.00
9	18.00
<b>Avg. Sludge Depth (inches)</b>	<b>15.3</b>

**CELL 3**

Data Point	Sludge Depth (inches)
1	12.00
2	6.00
3	12.00
4	12.00
5	18.00
6	6.00
7	18.00
8	30.00
9	18.00
<b>Avg. Sludge Depth (inches)</b>	<b>14.7</b>

**CELL 4**

Data Point	Sludge Depth (inches)
1	18.00
2	18.00
3	18.00
4	6.00
5	6.00
6	24.00
7	18.00
8	24.00
9	12.00
<b>Avg. Sludge Depth (inches)</b>	<b>16.0</b>

**CELL 1a**

Data Point	Sludge Depth (inches)
1	24.00
2	24.00
3	18.00
4	18.00
5	12.00
6	6.00
7	24.00
8	12.00
9	12.00
<b>Avg. Sludge Depth (inches)</b>	<b>16.7</b>

**CELL 1b**

Data Point	Sludge Depth (inches)
1	12.00
2	12.00
3	12.00
4	12.00
5	12.00
6	18.00
7	18.00
8	18.00
9	12.00
<b>Avg. Sludge Depth (inches)</b>	<b>14.0</b>

Required Freeboard	2.0
Pond Depth	8.000
Pond Width	582
Pond Length	1050
Design Flow (MGD)	1.000
Design Pond Operating Volume (ft <sup>3</sup> )	<b>3,666,600</b>
Actual Operating Volume (ft3)	<b>2,885,750</b>
Operating Volume (gallons)	<b>21,585,410</b>
% of Design Operating Volume Remaining	<b>78.7</b>
Retention Time (days)	<b>21.6</b>

Required Freeboard	2.0
Pond Depth	8.100
Pond Width	1350
Pond Length	1205
Design Flow (MGD)	1.000
Design Pond Operating Volume (ft <sup>3</sup> )	<b>9,923,175</b>
Actual Operating Volume (ft3)	<b>7,934,925</b>
Operating Volume (gallons)	<b>59,353,239</b>
% of Design Operating Volume Remaining	<b>80.0</b>
Retention Time (days)	<b>59.4</b>

Required Freeboard	2.0
Pond Depth	11.600
Pond Width	1175
Pond Length	1550
Design Flow (MGD)	1.000
Design Pond Operating Volume (ft <sup>3</sup> )	<b>17,484,000</b>
Actual Operating Volume (ft3)	<b>15,055,667</b>
Operating Volume (gallons)	<b>112,616,387</b>
% of Design Operating Volume Remaining	<b>86.1</b>
Retention Time (days)	<b>112.6</b>

Required Freeboard	2.0
Pond Depth	6.800
Pond Width	940
Pond Length	1258
Design Flow (MGD)	1.000
Design Pond Operating Volume (ft <sup>3</sup> )	<b>5,676,096</b>
Actual Operating Volume (ft3)	<b>4,033,707</b>
Operating Volume (gallons)	<b>30,172,129</b>
% of Design Operating Volume Remaining	<b>71.1</b>
Retention Time (days)	<b>30.2</b>

Required Freeboard	2.0
Pond Depth	7.500
Pond Width	940
Pond Length	1258
Design Flow (MGD)	1.000
Design Pond Operating Volume (ft <sup>3</sup> )	<b>6,503,860</b>
Actual Operating Volume (ft3)	<b>5,124,253</b>
Operating Volume (gallons)	<b>38,329,415</b>
% of Design Operating Volume Remaining	<b>78.8</b>
Retention Time (days)	<b>38.3</b>

Pond cell Widths and Lengths estimated from Google Earth