



# ETC Engineers & Architects, Inc.

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April 17, 2019

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

Re: City of Monticello – WWTP - West  
NPDES Permit # AR0021822 & AR002183

Dear Ms. Taylor,

On behalf of the City of Monticello and Mayor Chase, I am hereby responding to your comments articulated in your letter dated April 16, 2019. Your comments and related responses are as follows:

1. Pond Sludge Survey:

**Your Comments:**

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.

**City's Response:**

From the above comments it is clear that the West Pond system has adequate volume that far exceeds the required retention time per 10 State Standards. The East Pond System appears to have available storage that is less than required by the 10 State Standards. However, our records indicate that the Hydrograph Control System has been able to manage the outflow without ever causing an overflow of the pond levies.

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2. East Plant Hydrograph Control System:

**Your Comments:**

Certification that the Automated Hydrographic Controlled Release System has been installed and is working properly for the East Plant (AR0021831).

**City's Response:**

The East Plant Automated Hydrograph Control System was installed at the time of the original plant installation and as such no new Hydrograph Control instrumentation has been installed recently. The system is in good repair condition and operates as designed. Therefore, City request that this comment be considered "not applicable".

3. City's request for extension of the final compliance date:

**Your Comments:**

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.

**City's Response:**

Please see attached interim milestone schedule for all CAO items.

4. Progress Report:

**Your Comments:**

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.

**City's Response:**

Please see attached Progress Reports for the dates mentioned above.

5. Complete SSES Study:

**Your Comments:**

A complete Sewer System Evaluation Study (SSES) must be submitted by September 10, 2019 and shall include the following:

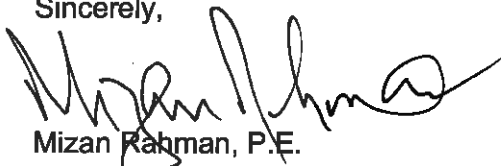
- o smoke testing performed in all areas of the collection system, beginning with highest priority areas;
- o televising performed of lines in areas deemed necessary based on smoke testing in order to locate leaks and to determine method of repair;
- o a plan to address deficiencies through rehabilitation, repair, or replacement;
- o a manhole inspection program, beginning in highest priority area;
- o Recommended method of repair and develop a cost estimate for such.

**City's Response:**

The City is in the process of starting this task as part of their commitment made in the agreement with ADEQ. Many of the tasks such as Smoke Testing will be performed in house while tasks such as flow monitoring will be performed by outside consultants. City is in discussion with outside consultants to develop scope etc. for each of the tasks. It is anticipated that this Item will require additional time for completion. Please see attached Milestone Schedule for a projected time line.

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

Sincerely,



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

CC: Mayor Paige Chase, City of Monticello



## **City of Monticello WWTP – West Plant**

**Revised Milestone Schedule – April 18, 2019**  
**Compliance Status of Corrective Actions**

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

Two City staff were enrolled in the SAU Camden Training Institute wastewater training class to be held in September in NW Arkansas. Those two employees have since attended the Training Course and completed the course. They are now appropriately trained in sample Collection and management practices. This CAO item is complete. Please remove this item from future review requirements.

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

All equipment and instruments have been installed and the system has been operational since September 2018. The system has been tested by the manufacturer's representative and was found to be operating as designed. This CAO item is complete. Please remove this item from future review requirements.

**CAP #3: SSES Study:** The City is finalizing work plan and budget requirements for this task. This task will require substantial capital investment and as such the City is using extra precaution. The City will use a combination of efforts whereby City's inhouse resources will collaborate with outside resources to obtain field data and process the data to complete the report. It is now anticipated that the task will be completed by the end of the first quarter of 2020.

**CAP #4: Contingency Plan for Power Failures at all Pump Stations:**

The City has installed "Quick Connect" electrical connectors to hook up all pump station except 4 stations. It is anticipated that these will be outfitted with the "Quick Connect" by the end of 3<sup>rd</sup> Quarter.

**CAP #5: Effluent Violations:** A final determination of the causes for the effluent violations have not been made yet. The City is continuing to study the causes and believe that by the end of the 4<sup>th</sup> quarter of 1019 a determination for the violations will be finalized.

**Based on the above facts, the City requests that the City be given additional time to complete the remaining 3 CAP items.**

# MILESTONE SCHEDULE OF ALL CORRECTIVE ACTIONS

## Monticello Wastewater Treatment Facilities

April 15, 2019

No.	CAP ITEMS	4th Qtr - 2017	1st Qtr - 2018	2nd Qtr - 2018	3rd Qtr - 2018	4th Qtr - 2018	1st Qtr - 2019	2nd Qtr - 2019	3rd Qtr - 2019	4th Qtr - 2019	
1	Operation and Maintenance Manual for sampling procedures	→ Completed in November 2018									
2	Automated Hydrographic Controlled Effluent Release System	→ Completed Sept 2018									
3	Perform Initial Study to Determine Extent of I&I in the Collection System	→									
4	Contingency Plan for power failures at Each Pump Station	→									
5	Determine Causes of Effluent Violations	→									

**Note:**

**Item 1:** Two City staff have been enrolled in the SAU Camden Training Institute wastewater training class to be held in September in NW Arkansas. Two employees attended the Training Course and completed the course. They are now appropriately trained in sample Collection and management practices.

**Item 2:** All equipment has been installed and tested. The system has been in operation since September 2018.

**Item 3:** The City is in the process of finalizing a scope for the 1 & 1 study. Due to change in administration and in the budgetary approval process, this task will take longer time to complete and the completion date will likely need to be extended.

**Item 4:** The City is installing necessary electrical switch gear at 2 pump stations a month to be able to connect a generator to the pumps in case of a power failure. City now lacks connecting only 4 remaining pump stations from having completed the task. It is anticipated that the task will be complete before the end of the year.

**Item 5:** Additional samplings are being collected and analyzed to further study the causes of the effluent violations. The City intends to complete this study by the end of the year.