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

January 25, 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 letter dated January 14, 2019, requesting an updated comprehensive Corrective Action Plan (CAP) in reference to the City's Consent Administrative Order (CAO).

The City of Monticello has 5 incomplete items in the CAP. Description of those items and the status of completion of those items are as follows.

1. Operation and Maintenance Manual for sampling procedure: The City had two of its WWTP staff members attend a structured class at the Camden facility regarding wastewater plant management including sampling and operation. They have established protocol for all sampling procedures and will follow those accordingly. This CAO item is now complete.
2. Hydrograph Controlled Release System: An automated hydrograph controlled release system has been installed at the WWTP. The system has been operation since September 2018. A certification in this regard is attached. This CAP item is now complete.
3. Contingency Plan for Power Failures Within the Wastewater Collection System: The City has started to install "Quick Connect" electrical connectors throughout the system. These "Quick Connect" switch gear allows a portable generator to be connected to a wastewater pump stations when power failure occurs at the pump

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■ e-mail: etc@etcengineersinc.com ■



station. So far, the City has installed "Quick Connects" in 8 pump station. It is anticipated that the City will complete this program by the end of the year.

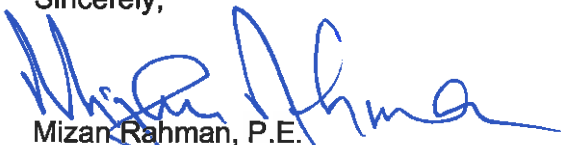
4. I & I Study: City has received proposals for the study from consultants. However, due to changes in the City administration no action has been taken as of now. The City is poised to move with the project in the near future.

5. Determine Causes of Effluent Violations: 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. The violations are random and are not coincident to any upstream activities. It is our belief that these issues will resolve once the automated hydrograph control system is in operation for a length of time and the pond levels are stabilized. We are studying the effect of the control system on these effluents and will be observing it until a conclusion can be made. 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.

6. Milestone Schedule: The City of Monticello is required to submit a milestone schedule of all corrective actions that include a reasonable expected final date of compliance. Please see attached milestone schedule.

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



MILESTONE SCHEDULE OF ALL CORRECTIVE ACTIONS

Monticello Wastewater Treatment Facilities

31-Dec-18

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:

Status as of December 31, 2018

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. They have completed the class and have obtained certification. See attached.

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 of I & I study. Due to change in the City Administration the budgetary approval process will take longer and the completion date 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. So far 8 pump stations have been outfitted with the necessary switch gear. It is anticipated that the task will be complete by 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.