



ARKANSAS

ENERGY & ENVIRONMENT

June 24, 2024

Honorable Parnell Vann, Mayor
City of Magnolia
P.O. Box 666
Magnolia, AR 71754

email: mayor@magnolia-ar.com

**RE: NPDES Permit Number: AR0043613, AFIN: 14-00059
CAP Response**

Dear Mayor Vann,

The Arkansas Division of Environment Quality (DEQ) has received and reviewed the Corrective Action Plan (CAP), dated June 12, 2024, for the above referenced facility. The CAP was deemed inadequate with the following comments:

- Per the language within the CAP, “Based on the evidence provided by the operator of the collection system, we believe most of the effluent violations are a direct result of multiple ongoing projects associated with the clarifiers. Currently, one clarifier is online and a second is operable and ready for use as needed. Other violations, particularly recoverable lead, are a result of lab errors. The lab documented results using erroneous units,” DEQ requests the following:
 - a. Not all violations can be attributed to clarifier problems. Specifically state which parameter violations were associated with the clarifier issues, and which were not.
 - b. Specify which violations were the result of lab errors and give the correct analytical values and units that show that there was not a violation of the respective permit limit.
 - c. If TRC violations were not lab errors, they need to be addressed, especially since dechlorination is used at the facility.
 - d. The CAP mentions I&I issues. State if any of the violations were associated with I&I.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0758, or you may email me at Kristen.Graham@arkansas.gov.

Sincerely,

A handwritten signature in blue ink that reads 'Kristen Graham'.

Kristen Graham
Compliance Analyst, DEQ, OWQ

cc: Tracie Love, Tracie_fontaine@yahoo.com
Russell Thomas, mwws@sbcglobal.net
Andy Franks, afranks@alfranksengineering.com