

**December 2, 2019**

**Memorandum for Record**

**RE:** Arkansas Department of Corrections – Multiple Permits – Cummins (AR0040827, 4425-W), Tucker (AR0035980, ARG640090, 5307-WG-WR), Izard County (AR0044016, 5124-WR-2), East Arkansas Regional Unit (AR0045578, 5226-WR-1)

**Summary:** On December 2, 2019, a meeting was held at DEQ in North Little Rock, AR between agents of Arkansas Department of Corrections (ADC) and DEQ.

A sign-in form with attendees is included as an attachment to this memorandum.

The meeting began at 11:00 am cst. After introductions, ADC was notified that an inspection team would be at the Tucker facility on Monday December 9, 2019, and asked to provide any suggestions to expedite access be provided to DEQ in advance. ADC agreed to contact the inspector supervisor to provide direction and assistance to expedite access.

DEQ then stated the purpose of the meeting was to gather a verbal status report and discuss current issues at the facilities. A review by facility was then conducted.

Tucker – ADC stated they felt the facility’s primary issue was due to an electrical pit that had been installed below flood level and was shorting out equipment. A pump has been installed and the elevation and waterproofing of the pit is 75% complete. A new alarm system with an auto dialer was also installed that has helped tremendously. The last effluent limit violation at the facility was June. Plant is still currently on bypass chlorination until UV system is fully restored which is expected by mid-January at the latest. A pump station is being replaced/installed and the backwash pond has been completed. DEQ asked that a summary status report be submitted.

Izard County – DEQ identified deficiencies with the current renewal application and waste management plan. A letter was sent November 19, 2019, by DEQ. ADC was advised if they couldn’t complete submission by requested date of Dec 3, 2019, to request an extension. DEQ addressed the failure to submit land application reports for 2015, 2016, 2017, and 2018 for this facility. ADC confirmed that land application had occurred and they will get the reports submitted. The Ammonia Nitrogen violations were discussed. ADC stated they have a cleaning chemical that is used by the facility that causes these issues, and they will readdress proper and improper use of the chemical to prevent recurrence.

East Arkansas Regional – Significant rehabilitation of the facility has been completed including new aerators, control panels, sludge pumps, valve actuators, and main lift stations. Land application reports have been received, but all reports for the facility were only submitted after DEQ request and past the deadline required by the Permit. MCE engineers and ADC staff stated the fecal coliform and total suspended solids violations occurred during the construction and

rehabilitation activities and confirmed all work was now complete. DEQ acknowledged that no effluent limit violations have been reported since June 2019. The need to submit a notice of termination for the construction permit was discussed. DEQ asked that a summary status report be submitted.

Cummins – ADC staff stated they have completed significant rehabilitation and replacement at the facility. Within a four month period, they had UV issues, complete failure of all paddle wheels, and failure of their aerator. The paddle wheels and aerator have been replaced with new units. The UV system is awaiting delivery to be replaced. ADC staff stated they have been told for the last 6 months that the system should be completed for delivery any day. The system is custom designed for the facility and should be plug and play when it arrives. DEQ discussed that the No-Discharge Permit for this facility hasn't been reviewed for some time, because the permit was issued without an expiration date. DEQ advised ADC to seriously consider voluntarily submitting a renewal application for the Permit. The effluent limit violations were discussed and evaluation of possible secondary system options be evaluated to limit or prevent the violations when the primary disinfection system is not available or functioning.

ADC was thanked for their time and information. DEQ advised that a summary of the meeting and an action item list will be sent to the attendees.

The meeting concluded at 11:50 am.

**Action Items and Deliverables:**

1. Summary status report by facility
2. Complete IZard County permit renewal documents (5124-WR-1)
3. Missing Land Application Reports (4425-W 2012 thru 2018) (5124-WR-1 2015 thru 2018)
4. Notice of Termination for EARU construction permit
5. Renewal Application (4425-W)
6. Review and decision summary of possible secondary disinfection components (AR0040827)

Memorandum prepared by:

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**Facility:** Arkansas Dept of Corrections, Multiple Permits  
East ARU, Cummins, Tucker, Izard County Corr

**Date/Location:** December 2, 2019/DEQ NLR

**MEETING ATTENDANCE**

Name	Signature	Organization	Job Title	E-Mail Address	Telephone Number
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**REMARKS:**