

Nancy Koon (adpce.ad)

To: Loretta Carstens (adpce.ad)
Subject: RE: EDCC, AR0000752

From: Amanda Gallagher [<mailto:agallagher@gbmcassoc.com>]
Sent: Thursday, November 3, 2022 1:58 PM
To: Loretta Carstens (adpce.ad)
Cc: Carrie McWilliams (adpce.ad); Eddie Pearson
Subject: RE: EDCC, AR0000752

Loretta,

See answers to your questions below in red:

- Are grab samples taken in the first 30 minutes at Outfall 006 and Outfall 007? **Yes when possible. If not within 30 minutes, as soon as possible after discharge from the outfall begins.**
- Why is there only one N+N samples at Outfalls 006 and Outfall 007? **Sampling for N+N is currently not a permit requirement. Thus, only one sample was collected.**
- Concentrations for metals at Outfall 010 during the term of the 2017 permit must be submitted. **See attached spreadsheet.**
- DEQ Form 1, Section C must reflect what is done with the solids that collect in the ponds associated with Outfalls 001 and 002 as well as the sludge/solids from the sanitary wastewater treatment plant associated with Outfall 003. **Section C has been revised appropriately. See attached Form 1 – Section C Replacement Page.**
- Copy of corrective action plan for January 2022 benchmark exceedance for TSS at Outfalls 006 and 007. **CAPs for January 2022 has been attached.**

Let me know if you need anything further.

Thanks,

Amanda Gallagher, P.E.
Environmental Engineer
Cell: (501) 837-8999 | agallagher@gbmcassoc.com



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From: Loretta Carstens (adpce.ad) <loretta.carstens@adeq.state.ar.us>
Sent: Friday, October 28, 2022 8:52 AM
To: Amanda Gallagher <agallagher@gbmcassoc.com>

Cc: Carrie McWilliams (adpce.ad) <Carrie.McWilliams@adeq.state.ar.us>

Subject: EDCC, AR0000752

Amanda,

Attached are some technical questions regarding the application for EDCC. There may be more later on but I didn't want to hold on to these any longer.

Loretta Carstens, P.E. | Engineer, P.E.

Division of Environmental Quality | Office of Water Quality

NPDES Permits Section

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ARKANSAS
ENERGY & ENVIRONMENT

SECTION C – WASTE STORAGE AND DISPOSAL INFORMATION

1. Solids/Sludge Disposal Method (Check as many as are applicable):

Solids are not produced at this facility.

Landfill:

Landfill Site Name _____ ADEQ Solid Waste Permit No. _____

Land Application: ADEQ State Permit No. _____

Septic tank: Arkansas Department of Health Permit No.: _____

Distribution and Marketing: Facility receiving sludge:

Name: _____ Address: _____

City: _____ State: _____ Zip: _____ Phone: _____

Rail: Pipe: Other: _____

Subsurface Disposal (Lagoon for which the sole purpose is storing sludge):

Location of lagoon _____ How old is the lagoon? _____

Surface area of lagoon: _____ Acre Depth: _____ ft Does lagoon have a liner? Yes No

Incineration: Location of incinerator _____

Remains in Treatment Lagoon(s):

How old is the lagoon(s)? _____ Has sludge depth been measured? Yes No

If Yes, Date measured? _____ Sludge Depth? _____ ft If No, When will it be measured? _____

Has sludge ever been removed? Yes No If Yes, When was it removed? _____

Other (Provide complete description): Septic tanks are pumped as needed by a license septic tank hauler. Solids are removed from Lake Lee and Lake Kildeer as needed basis and disposed of in a DEQ permitted facility.

Date	Hg ug/L	Cd mg/L	Hex Cr mg/L	Pb mg/L	Ni mg/L	Ag mg/L	Zn mg/l	Cr mg/L
Jan-17	0.0052	0.0002	0.007	0.00067	0.010	0.0002	0.012	0.007
Feb-17	0.0069	0.0002	0.007	0.00120	0.010	0.0002	0.026	0.007
Mar-17	0.0085	0.0002	0.007	0.00120	0.010	0.0002	0.018	0.007
Apr-17	0.0080	0.0002	0.007	0.00130	0.010	0.0002	0.024	0.008
May-17	0.0080	0.0002	0.010	0.00140	0.010	0.0002	0.021	0.010
Jun-17	0.0058	0.0002	0.010	0.00077	0.010	0.0002	0.010	0.007
Jul-17	0.0050	0.0002	0.010	0.00093	0.010	0.0002	0.012	0.010
Aug-17	0.0050	0.0002	0.010	0.00110	0.010	0.0002	0.024	0.010
Sep-17	0.0050	0.0002	0.010	0.00073	0.010	0.0002	0.020	0.010
Oct-17	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.023	0.010
Nov-17	0.0061	0.0005	0.010	0.00086	0.010	0.0005	0.042	0.010
Dec-17	0.0140	0.0005	0.010	0.00220	0.010	0.0005	0.048	0.010
Jan-18	0.0068	0.0005	0.010	0.00100	0.010	0.0005	0.081	0.010
Feb-18	0.0120	0.001	0.010	0.00160	0.010	0.0005	0.170	0.010
Mar-18	0.0140	0.0005	0.010	0.00180	0.010	0.0005	0.098	0.010
Apr-18	0.0090	0.0005	0.010	0.00099	0.010	0.0005	0.074	0.010
May-18	0.0140	0.0005	0.010	0.00100	0.010	0.0005	0.061	0.010
Jun-18	0.0050	0.0005	0.010	0.00055	0.010	0.0005	0.024	0.010
Jul-18	0.0059	0.0005	0.010	0.00055	0.010	0.0005	0.026	0.010
Aug-18	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.017	0.010
Sep-18	0.0050	0.0005	0.010	0.00075	0.010	0.0005	0.031	0.010
Oct-18	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.027	0.005
Nov-18	0.0065	0.0005	0.010	0.00050	0.010	0.0005	0.038	0.010
Dec-18	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.052	0.010
Jan-19	0.0050	0.0005	0.010	0.00070	0.010	0.0005	0.130	0.010
Feb-19	0.0087	0.0005	0.010	0.00050	0.010	0.0005	0.120	0.010
Mar-19	0.0064	0.0005	0.010	0.00050	0.010	0.0005	0.190	0.010
Apr-19	0.0071	0.0005	0.010	0.00330	0.010	0.0005	0.230	0.010
May-19	0.0110	0.0005	0.010	0.00068	0.010	0.0005	0.170	0.010
Jun-19	0.0050	0.0005	0.010	0.00085	0.010	0.0005	0.130	0.010
Jul-19	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.086	0.010
Aug-19	0.0050	0.0005	0.010	0.00097	0.010	0.0005	0.084	0.010
Sep-19	0.0050	0.0005	0.010	0.00057	0.010	0.0005	0.051	0.010
Oct-19	0.0050	0.0005	0.012	0.00075	0.010	0.0005	0.056	0.010
Nov-19	0.0250	0.0005	0.010	0.00050	0.001	0.0005	0.170	0.010
Dec-19	0.0050	0.0005	0.010	0.00120	0.010	0.0005	0.180	0.010
Jan-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.180	0.010
Feb-20	0.0070	0.0005	0.010	0.00180	0.010	0.0005	0.240	0.010
Mar-20	0.0050	0.0005	0.010	0.00460	0.010	0.0005	0.200	0.010
Apr-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.052	0.010
May-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.075	0.010
Jun-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.086	0.010
Jul-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.044	0.010
Aug-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.059	0.010
Sep-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.049	0.010
Oct-20	0.0050	0.0005	0.010	0.00080	0.010	0.0005	0.140	0.010

Nov-20	0.0050	0.0005	0.010	0.00080	0.010	0.0005	0.150	0.010
Dec-20	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.210	0.010
Jan-21	0.0050	0.0005	0.010	0.00059	0.010	0.0005	0.190	0.010
Feb-21	0.0050	0.0005	0.010	0.00350	0.010	0.0005	0.210	0.010
Mar-21	0.0050	0.0005	0.010	0.00058	0.010	0.0005	0.180	0.010
Apr-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.120	0.010
May-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.098	0.010
Jun-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.120	0.010
Jul-21	0.0050	0.0005	0.010	0.00086	0.010	0.0005	0.120	0.010
Aug-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.092	0.010
Sep-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.099	0.010
Oct-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.100	0.010
Nov-21	0.0050	0.0005	0.010	0.00077	0.010	0.0005	0.210	0.010
Dec-21	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.081	0.010
Jan-22	0.0050	0.0005	0.010	0.00087	0.010	0.0005	0.210	0.010
Feb-22	0.0005	0.0005	0.010	0.00050	0.010	0.0005	0.240	0.010
Mar-22	0.0050	0.0005	0.010	0.00053	0.010	0.005	0.280	0.010
Apr-22	0.0050	0.0005	0.010	0.00051	0.010	0.0005	0.230	0.010
May-22	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.140	0.010
Jun-22	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.160	0.010
Jul-22	0.0050	0.0005	0.010	0.00084	0.010	0.0005	0.089	0.010
Aug-22	0.0050	0.00057	0.010	0.00050	0.010	0.0005	0.074	0.010
Sep-22	0.0050	0.0005	0.010	0.00050	0.010	0.0005	0.089	0.010
Oct-22	0.0050	0.0005	0.010	0.00063	0.010	0.0005	0.240	0.010

Se mg/l	Cu mg/l	CN mg/L
0.0020	0.0052	0.010
0.0020	0.0064	0.010
0.0020	0.0050	0.010
0.0024	0.0096	0.010
0.0020	0.0056	0.010
0.0020	0.0048	0.010
0.0020	0.0048	0.010
0.0020	0.0047	0.010
0.0020	0.0051	0.010
0.0020	0.0046	0.010
0.0050	0.0080	0.010
0.0020	0.0065	0.010
0.0020	0.0054	0.010
0.0020	0.0075	0.010
0.0020	0.0061	0.010
0.0020	0.0055	0.010
0.0020	0.0058	0.010
0.0020	0.0060	0.010
0.0020	0.0045	0.010
0.0020	0.0058	0.010
0.0020	0.0059	0.010
0.0020	0.0030	0.010
0.0020	0.0046	0.010
0.0020	0.0041	0.015
0.0050	0.0450	0.010
0.0020	0.0035	0.010
0.0020	0.0069	0.010
0.0020	0.0130	0.010
0.0020	0.0085	0.010
0.0020	0.0061	0.010
0.0020	0.0056	0.010
0.0020	0.0067	0.010
0.0020	0.0059	0.010
0.0020	0.0075	0.010
0.0020	0.0085	0.010
0.0020	0.0110	0.010
0.0020	0.0065	0.010
0.0020	0.0100	0.010
0.0020	0.0110	0.010
0.0020	0.0032	0.010
0.0020	0.0058	0.010
0.0020	0.0047	0.010
0.0020	0.0053	0.010
0.0020	0.0047	0.010
0.0020	0.0021	0.010
0.0020	0.0039	0.010

0.0020	0.0040	0.010
0.0020	0.0045	0.010
0.0020	0.0047	0.010
0.0020	0.0110	0.010
0.0020	0.0051	0.010
0.0020	0.0057	0.010
0.0020	0.0045	0.010
0.0020	0.0051	0.010
0.0020	0.0094	0.010
0.0020	0.0044	0.010
0.0020	0.0051	0.010
0.0020	0.0065	0.013
0.0020	0.0100	0.010
0.0020	0.0023	0.010
0.0020	0.0051	0.001
0.0020	0.0041	0.010
0.0020	0.0074	0.010
0.0020	0.0045	0.010
0.0020	0.0054	0.010
0.0020	0.0046	0.010
0.0020	0.0028	0.010
0.0020	0.0052	0.010
0.0020	0.0044	0.010
0.0020	0.0048	0.010

Corrective Action Plan(CAP)

NPDES Permit AR 0000752-Outfall 006

Date of Sampling Event:01.01.2022

Date Sampling Results Received: 01.06.2022

Date Corrective Action Plan Initiated:01.11.2022

Outfall	Parameter	Sample Results	Benchmark Value
007	TSS	180 mg/L	100 mg/L

Introduction:

EDCC received the results for Outfall 006 from American Interplex on 01.06.2022 We started an investigation of the elevated Total Suspended Solids results. We found the outfall area after going through a pipeline construction (CO2) nearby that it had no vegetation in one of the three ditches that feed Outfall 006 to help with the filtration of water discharging through the outfall.

Corrective Actions:

EDCC will add winter grass seed in order to try and provide some natural vegetation for filtration. BMPs of hay bales were provided also to assist the vegetation in the other two ditches in order to decrease the suspended solids being washed from the drainage area into the outfall.

Implementation Schedule:

EDCC began the addition of BMPs 01.17.2022

EDCC will test each week during rain events and continue to add BMPS if needed to meet the Benchmark Value.

Corrective Action Plan(CAP)

NPDES Permit AR 0000752-Outfall 007

Date of Sampling Event:01.01.2022

Date Sampling Results Received: 01.06.2022

Date Corrective Action Plan Initiated:01.11.2022

Outfall	Parameter	Sample Results	Benchmark Value
007	TSS	130 mg/L	100 mg/L

Introduction:

EDCC received the results for Outfall 007 from American Interplex on 01.06.2022 We started an investigation of the elevated Total Suspended Solids results. We found the outfall area after going through the winter months had no vegetation to help with the filtration of water discharging through the outfall.

Corrective Actions:

EDCC will add winter grass seed in order to try and provide some natural vegetation for filtration. BMPs will be provided if the vegetation does not decrease the suspended solids being washed from the drainage area into the outfall.

Implementation Schedule:

EDCC began the addition of BMPs 01.17.2022

EDCC will test each week during rain events and continue to add BMPS if needed to meet the Benchmark Value.