



ARKANSAS  
Department of Environmental Quality

December 19, 2006

Honorable Howard L. Taylor  
City of Prescott  
P. O. Box 676  
Prescott, AR 71857

RE: NPDES Permit No. AR0033481  
Firestone Building Products Connection to the City of Prescott Sewer System

Dear Mayor Taylor:

In reference to the Marlar Engineering Co. letter dated December 7, 2006, the City of Prescott has agreed to accept Firestone wastewater (i.e., cooling tower blowdown, water softener discharge, and boiler blowdown) which currently discharges to Outfalls 001 and 002. ADEQ has no objection to Firestone's proposed connection to the City of Prescott sewer system.

Based on a conversation between Mr. Perry Nelson (Prescott Water and Wastewater Manager) and Mr. Parviz Mokhtari (ADEQ NPDES Permit Engineer) on December 15, 2006, this proposed connection has already been made, and Firestone has already begun discharging to the City of Prescott. We will retroactively accept the Marlar Engineering letter as the notification required by NPDES Permit No. AR0033481 Part II.D.(1)(c) and Part III.6(c), even though the Marlar letter only refers to an agreement and not to an actual connection.

However, review of the Firestone data shows potential for copper and zinc toxicity. Therefore, ADEQ requires that the City of Prescott perform monthly sampling of the WWTP influent and effluent for copper and zinc based on the following schedule for a period of two (2) years from the date it began receiving the Firestone effluent.

Pollutant	Monitoring Requirements		MQL	EPA Test Method
	Frequency	Sample Type		
Copper total, recoverable	once/month	24-hr composite	10	220.2
Zinc total, recoverable	once/month	24-hr composite	20	200.7

The results of copper and zinc must be submitted to ADEQ as an attachment to each DMR. At the end of two years of monitoring, the City may submit a written request to cease if the test results indicate no potential for exceeding water quality criteria.

If the monthly or historical results show "reasonable potential" above water quality criteria for copper and zinc, the City of Prescott's permit may be reopened to include new limitations (i.e., copper, zinc, and/or WET testing). If no reasonable potential exists, the above monitoring requirements may no longer be required.

ADEQ appreciates your cooperation in this matter. If you have any questions, please contact the NPDES Branch at (501) 682-0622.

Sincerely,

Mo Shafii  
NPDES Section Chief

cc: Mr. Perry Nelson, City of Prescott  
Mr. Michael P. Marlar, P.E., Marlar Engineering Co.  
Mr. William Smith, Firestone Building Products Company

WATER DIVISION



**MARLAR ENGINEERING CO., INC.**

*Consulting Civil Engineers & Land Surveyors*

5318 John F. Kennedy Boulevard  
North Little Rock, Arkansas 72116

2920

Forrest C. Marlar, PE, PLS  
Michael P. Marlar, PE, PLS  
Walt C. Catlett, PE  
L. David Jones Jr., PLS  
Jack Flemming, Biologist

December 7, 2006

Mr. Mo Shaffi  
Arkansas Department of Environmental Quality  
NPDES Section  
P.O. Box 8913  
Little Rock, Arkansas

Re: City of Prescott / Fireston Corporation

Dear Mr. Shaffi:

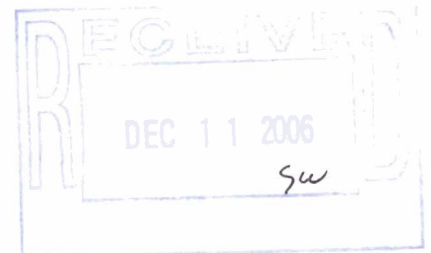
We were requested by Victoria Prewett to inform you that the City of Prescott has agreed to allow Firestone Corporation to connect their sewer system to the city's sewer system. Please contact us if you have any questions.

Sincerely,  
Marlar Engineering Company, Inc.

Michael P. Marlar, PE  
Project Engineer

CC: Mayor Howard Taylor  
City of Prescott

Perry Nelson  
Water/Wastewater Manager



# Fax Transmission

**City of Prescott**  
118 W. Elm St. - P.O. Box 676  
Prescott, AR 71857-0676  
870 887-2210  
Fax 870 887-5746

To: ADEP

Date: 12-15-06

Fax: 501-682-0910

Pages: 2, including this cover sheet

From: PERRY NELSON

Subject: Copper - results  
City of Prescott

Comments: 00033481

FOR PARVIZ MOKHARI

DEC 18 2006

**Firestone Copper tests results - 2006****Samples collected by ESC**

Samples collected before the Wastewater Treatment Plant at Hwy 24 and Ash Street (influent) and at the Aeration tank effluent in the WWTP for the effluent.

June 28	influent	4.0 ppb	
	effluent	less than 3.0 ppb	
July 5	influent	total cu	23.0 ppb
		dissolved cu	3.0 ppb
	effluent	total cu	3.0 ppb
		dissolved cu	3.0 ppb
July 19	influent	total cu	38.0 ppb
		dissolved cu	9.0 ppb
	effluent	total cu	3.0 ppb
		dissolved cu	3.0 ppb

extra sample collected at the Little Missouri Bridge on Hwy 67

total cu 3.0 ppb  
dissolved cu 3.0 ppb

