

ARKANSAS DEPARTMENT OF ENERGY AND ENVIRONMENT
DIVISION OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

City of Blytheville
PO Box 1784
Blytheville, AR 72316

LIS No. 20- 166

City of Blytheville- South Treatment Facility

Permit No. AR0022578
AFIN 47-00926

and

City of Blytheville- West Treatment Facility

Permit No. AR0022560
AFIN 47-00544

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order (“Order”) is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. § 8-4-101 *et seq.*, the Federal Water Pollution Control Act, 33 U.S.C. § 1311 *et seq.*, and the regulations and rules issued thereunder by Arkansas Pollution Control and Ecology Commission (APC&EC).

The issues herein having been settled by the agreement of the City of Blytheville (Respondent) and the Division of Environmental Quality¹ (DEQ), it is hereby agreed and stipulated that the following FINDINGS OF FACT and ORDER AND AGREEMENT be entered.

FINDINGS OF FACT

1. Respondent operates a municipal wastewater treatment facility (South Facility) located at 4001 NCR 647 Mississippi Ave., Blytheville, Mississippi County, Arkansas.

¹ Pursuant to Act 910 of 2019, the Arkansas Transformation and Efficiencies Act, the former Arkansas Division of Environmental Quality is now the Division of Environmental Quality in the newly created Division of Energy and Environment.

2. Respondent discharges treated wastewater from the South Facility to an unnamed tributary, thence to Ditch No. 17, thence to Ditch No.6, thence to Ditch No.1, thence to the St. Francis River in Segment 5A of the St. Francis River Basin.
3. Respondent operates a municipal wastewater treatment plant (West Facility) located at 4952 NCR. 635, Blytheville, Mississippi County, Arkansas 72315.
4. Respondent discharges treated wastewater from the West Facility to Ditch No. 27, thence to the Left Hand Chute of the Little River, thence to the St. Francis River in Segment 5C of the St. Francis River Basin.
5. Respondent is regulated pursuant to the National Pollutant Discharge Elimination System (NPDES).
6. Pursuant to the federal Clean Water Act, 33 U.S.C. § 1311(a) *et seq.*, the NPDES program prohibits the discharge of pollutants except as in compliance with a permit issued under the NPDES program in accordance with 33 U.S.C. § 1342(a).
7. DEQ is authorized under the Arkansas Water and Air Pollution Control Act (“Act”) to issue NPDES permits in the state of Arkansas and to initiate an enforcement action for any violation of an NPDES permit.
8. Ark. Code Ann. § 8-4-217(a)(3) provides:
 - (a) It shall be unlawful for any person to:
 - ...
 - (3) Violate any provisions of this chapter or of any rule or order adopted by the [APC&EC] under this chapter or of a permit issued under this chapter by the [DEQ].

9. Ark. Code Ann. § 8-4-103(c)(1)(A) authorizes DEQ to assess an administrative civil penalty not to exceed ten thousand dollars (\$10,000) per violation for any violation of any provision of the Act and any rule or permit issued pursuant to the Act.
10. Pursuant to Ark. Code Ann. § 8-4-103(c)(1)(B), “[e]ach day of a continuing violation may be deemed a separate violation for purposes of penalty assessment.”

South Facility

11. DEQ issued NPDES Permit Number AR0022578 (“South Permit”) to Respondent on December 10, 2013. The South Permit became effective on January 1, 2014, with an expiration date of December 31, 2018. DEQ issued a permit modification to the South Permit to Respondent on September 23, 2014, with an effective date of October 1, 2014, and an expiration date of December 31, 2018.
12. DEQ issued the renewal South Permit to Respondent on June 27, 2019, with an effective date of July 1, 2019, and an expiration date of June 30, 2024.
13. On May 31, 2018, DEQ conducted a routine compliance evaluation inspection of the South Facility. The following violations of the South Permit were identified during the inspection:
 - a. The inspector observed multiple broken air lines and damaged diffusers.
 - b. The inspector observed multiple locations where vegetation was growing on air lines and clarifier curtains.
 - c. The inspector observed hydraulically overloaded clarifiers and submerged separation curtains.
 - d. The inspector observed excess sludge accumulation in the polishing pond.

- e. The inspector determined that staffing practices and levels were insufficient to maintain and operate the South Facility. Respondent has not employed adequate operating staff to complete required operation, maintenance, and testing functions to ensure compliance with the South Permit.

These conditions are a violation of Part III, Section B, Condition 1 of the South Permit and therefore are a violation of Ark. Code Ann. § 8-4-217(a)(3).

14. On July 3, 2018, DEQ received a renewal application for the South Permit. The South Permit renewal application was deemed complete on July 13, 2018, and Respondent's expiring permit was administratively continued pursuant to APC&EC Reg. 6.201.

15. On July 18, 2018, DEQ conducted a compliance review of certified Discharge Monitoring Reports (DMRs) submitted by Respondent. The review revealed that Respondent reported the following violations of the permitted effluent discharge limits detailed in Part I, Section A of the South Permit from January 1, 2018, through June 30, 2018:

- a. Fifteen (15) violations for Ammonia Nitrogen.

16. Each of the fifteen (15) discharge limitation violations listed above constitutes a separate permit violation for a total of fifteen (15) separate violations of Ark. Code Ann. § 8-4-217(a)(3).

17. The review also revealed that Respondent failed to submit DMRs by the 25th of the month following the reporting period for the following monitoring periods: January 2018, March 2018, and May 2018. Each failure to submit DMRs by the 25th of the month following the reporting period constitutes a separate permit violation for a total of three (3) separate violations of Part III, Section C, Condition 5 of the South Permit and therefore three (3) violations of Ark. Code Ann. § 8-4-217(a)(3).

18. The review further revealed that Respondent failed to submit Non-Compliance reports (NCRs) for the following monitoring periods: January 2018, February 2018, March 2018, April 2018, and May 2018. Each failure to submit NCRs constitutes a separate permit violation for a total of five (5) separate violations of Part III, Section D, Condition 7 of the South Permit and therefore five (5) violations of Ark. Code Ann. § 8-4-217(a)(3).

19. On July 18, 2018, DEQ contacted Respondent by phone regarding violations of the permitted effluent limits and failure to submit noncompliance reports. During this call, Respondent notified DEQ that the South Facility did not currently employ a Class III operator.

20. On July 25, 2018, Respondent submitted NCRs for the following monitoring periods: January 2018, February 2018, March 2018, April 2018, and May 2018.

21. On August 22, 2018, Respondent notified DEQ that a Class IV operator had been hired to operate the South Facility.

22. On October 9, 2018, DEQ and Respondent met to discuss the effluent violations, sanitary sewer overflows, and corrective actions for the South Facility.

23. On November 8, 2018, DEQ requested submission of a revised Corrective Action Plan (CAP) stamped by a Professional Engineer licensed in the state of Arkansas, an Interim Operating Plan, and an update to the Sanitary Sewer Evaluation Study.

24. On January 3, 2019, DEQ notified Respondent of the May 31, 2018 inspection results.

25. On January 7, 2019, DEQ received a revised CAP, including an update to Respondent's previously submitted Sanitary Sewer Evaluation Study, and Interim Operating Plan.

26. On February 9, 2019, a compliance review of certified DMRs submitted by Respondent in accordance with the South Permit was conducted by DEQ for the period July 1, 2018, through December 31, 2018.

27. The review revealed that Respondent reported the following violations of the permitted effluent discharge limits detailed in Part I, Section A of the South Permit from July 1, 2018, through December 31, 2018:

- a. One (1) violation for Fecal Coliform; and
- b. Six (6) violations for Ammonia Nitrogen.

28. Each of the seven (7) discharge limitation violations listed above constitutes a separate permit violation for a total of seven (7) separate violations of Ark. Code Ann. § 8-4-217(a)(3).

29. The review also revealed that Respondent did not conduct Whole Effluent Toxicity (WET) Testing as required by the South Permit. WET testing was not conducted during the January to March 2018, April to June 2018, and July to September 2018 reporting periods, and the WET results reported for the October to December 2018 reporting period violated the toxicity limit defined by the South Permit.

30. On February 13, 2019, DEQ accepted the revised CAP received on January 7, 2019, with comments and additional stipulations. Respondent requested an extension for submittal of revisions, and the Division granted Respondent's request on February 21, 2019.

31. On March 11, 2019, DEQ received a revised CAP that adequately addressed DEQ's comments and additional stipulations.

32. A review of sanitary sewer overflow reports submitted to DEQ revealed twenty-seven (27) sanitary sewer overflows that occurred between April 1, 2017, and May 17, 2019.

West Facility

33. On April 29, 2016, Respondent and DEQ entered into Consent Administrative Order LIS 16-030 (CAO LIS 16-030). CAO LIS 16-030 became effective on June 10, 2016.

34. DEQ issued NPDES Permit Number AR0022560 ("West Permit") to Respondent on March 5, 2018, with an effective date of November 1, 2016, and an expiration date of October 31, 2021. DEQ issued a permit modification to Respondent on March 5, 2018, with a modification date of March 6, 2018, and an expiration date of October 31, 2021.

35. On December 4, 2017, Respondent and DEQ amended CAO LIS 16-030. CAO LIS 16-030, as amended by CAO LIS 16-030-001, became effective on December 4, 2017.

36. On May 31, 2018, DEQ conducted a routine compliance evaluation inspection of the West Facility. The inspection revealed Respondent failed to operate and maintain the West Facility properly as observed by the following:

- a. Multiple locations of vegetation were growing on air lines and clarifier curtains;
- b. Excessive and extensive accumulations of solids were in the clarifier weirs;
- c. The clarifier sludge return was partially clogged and overflowing;
- d. Multiple air leaks due to broken air lines and damaged diffusers; and
- e. Excessive and extensive accumulations of solids were in the polishing pond.

Failure to operate and maintain the West Facility properly violates Part III, Section B, Condition 1 of the West Permit and therefore violates Ark. Code Ann. § 8-4-217(a)(3).

37. On June 30, 2018, Respondent failed to achieve final compliance and submit a final compliance report as required by CAO LIS 16-030, as amended by CAO LIS 16-030-001. These failures violated the terms of the CAO.

38. On August 24, 2018, DEQ emailed Respondent a warning letter concerning effluent limit violations and failure to conduct sampling and analysis for the monitoring period ending July 31, 2018. In that email, DEQ requested that Respondent submit a revised Corrective Action Plan

(CAP) due to Respondent's failure to meet the final compliance date of CAO LIS 16-030 as amended by CAO LIS 16-030-001.

39. On August 31, 2018, PMI, Inc. consulting engineers, on behalf of Respondent, requested a meeting to discuss the violations.

40. On October 9, 2018, DEQ, Respondent, and PMI, Inc. met to discuss the effluent limit violations, sanitary sewer overflows, progress on CAO 16-030, as amended by 16-030-001, the May 31, 2018 compliance inspection results, and CAP revisions.

41. On November 8, 2018, DEQ requested Respondent submit a revised CAP, an Interim Operating Plan, and an update to the Sanitary Sewer Evaluation Study on or before January 7, 2019.

42. On January 3, 2019, DEQ notified Respondent via letter of the May 31, 2018 inspection results.

43. On January 7, 2019, DEQ received a revised CAP that included an Interim Operating Plan and an update to the Sanitary Sewer Evaluation study. On February 13, 2019, DEQ accepted the revised CAP received on January 7, 2019, with comments and additional stipulations.

44. On March 11, 2019, DEQ received a revised CAP (WW-CAP) that adequately addressed DEQ's comments and additional stipulations. This WW-CAP addressed corrective actions for both the South Facility and the West Facility.

45. On April 15, 2019, DEQ conducted a review of certified DMRs submitted by Respondent in accordance with the West Permit.

46. The review revealed that Respondent reported the following violations of the permitted effluent discharge limits detailed in Part I, Section 1A of the West Permit from September 1, 2017, through March 31, 2019:

- a. One (1) violation for Mercury;
- b. Twenty-seven (27) violations for Ammonia Nitrogen; and
- c. Fourteen (14) violations for Fecal Coliform.

47. Each of the forty-two (42) discharge limitation violations listed above constitutes a separate permit violation for a total of forty-two (42) separate violations of Ark. Code Ann. § 8-4-217(a)(3).

48. The review of the DMRs also revealed that Respondent failed to conduct WET Testing as required by Part 1, Section A, and Part II, Condition 10 of the West Permit for the following monitoring periods:

- a. January to March 2018;
- b. April to May 2018; and
- c. June to July 2018.

49. Each of the three (3) failures to conduct WET Testing listed above constitutes a separate permit violation for a total of three (3) separate violations of Ark. Code Ann. § 8-4-217(a)(3).

50. The review of the DMRs further revealed that Respondent failed to conduct sampling and analysis of all parameters required by the West Permit for the July 2018 monitoring period. This failure is a violation of Part 1, Section 1A of the West Permit and therefore a violation of Ark. Code Ann. § 8-4-217(a)(3).

51. A review of sanitary sewer overflow reports submitted in accordance with the terms of the West Permit revealed that twenty-one (21) sanitary sewer overflows occurred between August 31, 2017, and May 17, 2019.

52. On November 5, 2019, DEQ reviewed the West Facility's Pretreatment Program 2018 Annual Report. The review revealed that Respondent failed to operate and monitor the industrial pretreatment program in accordance with Section 402(b)(8) of the Clean Water Act, the General Pretreatment Regulations (40 CFR Part 403) and the approved POTW pretreatment program submitted by the Respondent. Specifically, Respondent failed to:

- a. Issue control mechanisms to 90% of Significant Industrial Users (SIU) in a timely fashion;
- b. Inspect or sample at least 80% of SIUs; and
- c. Enforce pretreatment standards, reporting requirements, and other violations of concern (e.g., incomplete influent/effluent monitoring) to the Approval Authority.

These failures are a violation of Part II, Condition 7 of the West Permit and therefore a violation of Ark. Code Ann. § 8-4-217(a)(3).

ORDER AND AGREEMENT

WHEREFORE, the parties stipulate and agree as follows:

1. Consent Administrative Order LIS 16-030, as amended by CAO LIS 16-030-001, shall be closed on the effective date of this Order.

A. Wastewater Treatment Facility

2. Respondent shall comply with the terms, milestone schedule, and final compliance date in the revised Corrective Action Plan (WW-CAP) received on March 11, 2019. The WW-CAP,

milestone schedule, and final compliance date of October 31, 2021, shall be fully enforceable as terms of this Order.

3. A final compliance report for the WW-CAP shall be submitted on or before the final compliance date of October 31, 2021. This report shall be prepared, stamped, and signed by a Professional Engineer licensed in the State of Arkansas and shall certify that the work has been completed at the South Facility and West Facility and with proper operation and maintenance the facilities should remain compliant with their respective permits.

B. Sanitary Sewer Collection System

4. Within thirty (30) calendar days of the effective date of this Order, Respondent shall submit a comprehensive Collection System Corrective Action Plan (CS-CAP) to DEQ, for review and approval, addressing the deficiencies identified by the revised SSES. The CS-CAP shall detail the actions to be taken to eliminate peak flows caused by inflow and infiltration. This plan shall at a minimum include the following items:

- a. Corrective actions to address the deficiencies of all wastewater collection lines, mains, and pump stations that cannot carry peak hydraulic loads caused by inflow and infiltration;
- b. Corrective actions to address all pump stations that do not have auxiliary power or sufficient storage as required by Part II, Section B, Condition 7 and shall identify all pump stations that do not have direct notification alarms;
- c. Corrective actions to address manhole deficiencies including location mapping and remediation or replacement to reduce inflow and infiltration at municipal manhole locations;

- d. A milestone schedule including dates when the deficiencies identified by the SSES and the items listed in a through c of this paragraph will be completed. The milestone schedule shall also include a final compliance date.
5. Upon approval by DEQ, the CS-CAP, milestone schedule, and the CS-CAP final compliance date shall be fully enforceable as terms of this Order.
6. Until this Order is closed, Respondent shall, at least every two (2) years, reevaluate the wastewater collection system to identify necessary revisions to the CS-CAP to ensure the goal of eliminating collection system overflows and problems related to peak hydraulic loads is achieved. Within fifteen (15) calendar days of completion of each milestone of the CS-CAP, Respondent shall submit to DEQ a progress report detailing the work completed, ongoing flow evaluation results, and additional routine repairs made to the collection system.
7. A final compliance report for the CS-CAP shall be submitted on or before the approved CS-CAP compliance date. This report shall be prepared, stamped, and signed by a Professional Engineer licensed in the State of Arkansas and shall certify that the work has been completed and with proper operation and maintenance the collection system should be able to convey routine and peak flows to the wastewater treatment facility.

C. Testing, Analysis, and Reporting

8. Respondent shall comply with the testing, analysis, and reporting requirements in the respective South Permit and West Permit and implement appropriate oversight and controls to prevent recurrence of the testing, analysis, and reporting violations.

D. Pretreatment Program

9. Within sixty (60) calendar days of the effective date of this Order, Respondent shall submit a compliance report describing the actions taken to correct deficiencies identified in the pretreatment program.

E. Order and Agreement

10. On or before the fifteenth (15th) day of the month following the effective date of this Order, and each calendar quarter thereafter for a period lasting until this Order is closed, Respondent shall submit quarterly progress reports detailing the progress that has been made towards compliance with the final permitted effluent limits of Part I, Section 1A of the South Permit and Part I, Section A of the West Permit and the milestone schedules of the WW-CAP and CS-CAP.

11. Within ninety (90) calendar days of the effective date of this Order, Respondent shall submit an administratively complete construction application for the new combined facility. Respondent shall develop and submit to DEQ an operation and maintenance manual for the new combined facility that shall include, at minimum:

- a. Staff responsibilities, by title;
- b. A detailed outline of the treatment system components;
- c. Written standard operating procedures;
- d. Written standard internal facility inspection and reporting process; and
- e. An environmental management system to:
 - (1) Calendar all permit-required regularly scheduled testing and reporting requirements;

- (2) Track incidents of noncompliance and their respective reporting requirements such as Noncompliance Reports, Sanitary Sewer Overflows, 5-Day Reports, etc.; and
- (3) Calendar all regular maintenance tasks.

12. In compromise and full settlement of the violations specified in the Findings of Fact, Respondent agrees to pay a civil penalty of Twenty Four Thousand Five Hundred Dollars (\$24,500.00), of which Eighteen Thousand Dollars (\$18,000.00) shall be conditionally SUSPENDED by DEQ. Payment of Six Thousand Five Hundred Dollars (\$6,500.00) is due within thirty (30) calendar days of the effective date of this Order. Such payment of the penalty shall be made payable to the Division of Environmental Quality, and mailed to the attention of:

DEQ, Fiscal Division
5301 Northshore Drive
North Little Rock, AR 72118

The suspension and dismissal of civil penalties is contingent upon Respondent complying with the terms of this Order. If Respondent fully complies with this Order, the suspended civil penalty of Eighteen Thousand Dollars (\$18,000.00) shall be DISMISSED by DEQ. If Respondent violates any term of this Order, or fails to pay the reduced sum of Six Thousand Five Hundred Dollars (\$6,500.00), the full balance of Twenty Four Thousand Five Hundred Dollars (\$24,500.00) shall become immediately due and payable to DEQ. In the event that Respondent fails to pay the civil penalty within the prescribed time, DEQ shall be entitled to attorneys' fees and costs of collection.

13. Failure to meet any requirement or deadline of this Order constitutes a violation of this Order. If Respondent should fail to meet any such requirements or deadlines, Respondent

consents and agrees to pay on demand to DEQ stipulated penalties according to the following schedule:

- a. First day through fourteenth day: \$100.00 per day
- b. Fifteenth day through the thirtieth day: \$500.00 per day
- c. Each day beyond the thirtieth day: \$1000.00 per day

These stipulated penalties for delay in performance shall be in addition to any other remedies or sanctions that may be available to DEQ by reason of failure by Respondent to comply with the requirements of this Order.

14. If any event, including but not limited to an act of nature, occurs that causes or may cause a delay in the achievement of compliance by Respondent with the requirements or deadlines of this Order, Respondent shall so notify DEQ, in writing, as soon as reasonably possible after it is apparent that a delay will result, but in no case after the due dates specified in this Order. The notification shall describe in detail the anticipated length of the delay, the precise cause of the delay, the measures being taken and to be taken to minimize the delay, and the timetable by which those measures will be implemented.

15. DEQ may grant an extension of any provision of this Order if Respondent requests such an extension in writing, and the delay or anticipated delay has or will be caused by circumstances beyond the control of and without the fault of Respondent. The time for performance may be extended for a reasonable period, but in no event longer than the period of delay resulting from such circumstances. Respondent has the burden of proving that any delay is caused by circumstances beyond the control and without the fault of Respondent, as well as the length of the delay attributable to such circumstances. Failure to notify DEQ promptly, as provided in the preceding paragraph of this Section, shall be grounds for a denial of an extension.

16. All requirements by the Order and Agreement are subject to approval by DEQ. Unless otherwise specified herein, in the event of any deficiencies, Respondent shall, within the timeframe specified by DEQ, submit any additional information or changes requested, or take additional actions specified by DEQ to correct any such deficiencies. Failure to respond adequately to such Notice of Deficiency within the timeframe specified in writing by DEQ constitutes a failure to meet the requirements established by this Order.

17. This Order is subject to public review and comment in accordance with Ark. Code Ann. § 8-4-103(d) and APC&EC Regulation No. 8 and shall not be effective until thirty (30) calendar days after public notice is given. DEQ retains the right to rescind this Order based upon the comments received within the thirty (30) day public comment period. Notwithstanding the public notice requirements, the corrective actions necessary to achieve compliance shall be taken immediately. The publication of this Order shall occur on or about the 10th or 25th day of the month following the date this Order is executed. As provided by APC&EC Regulation No. 8, this matter is subject to being reopened upon Commission initiative, or in the event a petition to set aside this Order is granted by the Commission.

18. Nothing in this Order shall be construed as a waiver by DEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this Order does not exonerate Respondent from any past, present, or future conduct that is not expressly addressed herein, nor does it relieve Respondent of its responsibilities for obtaining any necessary permits.

19. This Order has been reviewed and approved by the City Council of Respondent in a duly convened meeting with a quorum present. See copy of [meeting minutes or resolution] attached as Exhibit A.

20. The City Council of Respondent has authorized the Mayor and City Clerk/Treasurer to sign this Order on behalf of Respondent. See Exhibit A.

21. The City Council of Respondent has authorized the Mayor and City Clerk/Treasurer to expend funds for compliance activities required by this Order including but not limited to the payment of a civil penalty as set forth in this Order. See Exhibit A.

SO ORDERED THIS 13th DAY OF August, 2020.

Becky W. Keogh
BECKY W. KEOGH, DIRECTOR

APPROVED AS TO FORM AND CONTENT:

City of Blytheville

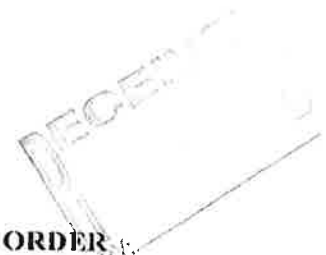
BY: James W. Sanders
(Signature)

James W. Sanders
(Typed or printed name)

TITLE: Mayor

DATE: 7/22/20

CK# 33422



RESOLUTION NO. 2020: 22

A RESOLUTION APPROVING THE CONSENT ADMINISTRATIVE ORDER FROM THE ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY; AUTHORIZING THE MAYOR AND CITY CLERK TO EXECUTE AND PERFORM UNDER THE TERMS OF THE ADMINISTRATIVE ORDER AND RELATED INSTRUMENTS; AND FOR OTHER PURPOSES

WHEREAS, the City of Blytheville owns and operates the Wastewater South Treatment Facility located 4001 NCR 647 Mississippi Avenue (NPDES Permit No. AR0022578, AFIN 47-00926) and the West Treatment Facility located 4952 NCR 635 (NPDES Permit No. AR0022560, AFIN 47-00544); and

WHEREAS, the Arkansas Department of Environmental Quality ("ADEQ") has determined that a Consent Administrative Order (the "Order") is necessary to ensure compliance with the Arkansas Water and Air Pollution Control Act (the "Act"); and

WHEREAS, a proposed Order has been submitted to the City of Blytheville by the Director of the ADEQ; and

WHEREAS, the City Council of the City of Blytheville Arkansas wishes to comply with the Order and the Act.

NOW THEREFORE, BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF BLYTHEVILLE, ARKANSAS:

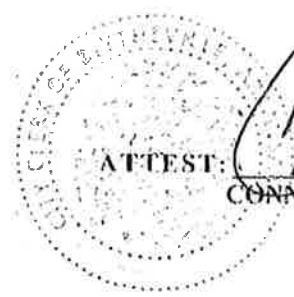
SECTION 1. That the Blytheville City Council approves and ratifies the terms, conditions, and obligations contained within the Order.

SECTION 2. That the Blytheville City Council authorizes and directs the Mayor and City Clerk to execute and deliver the Order to ADEQ.

SECTION 3. That the Mayor is authorized to take all actions determined to be necessary, in the sole and exclusive determination of the Mayor, in the performance of all obligations, duties and responsibilities contained within the Order to ensure compliance with the Act.

ADOPTED THIS 21st DAY OF JULY, 2020.

APPROVED: James Sanders
JAMES W. SANDERS, MAYOR



ATTEST: Connie Mosley-Brents
CONNIE MOSLEY-BRENTS, CLERK/TREAS