ADEQ
ARKANSAS
Department of Environmental Quality

May 6, 2009

Craig Noble, General Manager
RUSSELLVILLE CITY CORPORATION
P.O. Box 3186
Russellville, AR 72811

RE: Inspection of RUSSELLVILLE CITY CORPORATION

AFIN: 58-00105 NPDES Permit No.: AR0021768

Dear Mr. Noble:

On 4/22/2009, I performed a routine compliance inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

1. At the time of inspection, the flow meter deviation from the actual flow was greater than 10% error. This is a violation of your Permit as stated in Part II, Section C. 2.

2. Weir plates thicker than ¼ inch need a beveled downstream edge to ensure accurate discharge measurement (ISCO Open Channel Flow Measurement Handbook, Chapter 3). The plant's weir is 3/8 inch thick and is not beveled. This is a violation of your Permit as stated in Part II, Section C. 2.

3. Influent samples collected to detect the presence of the toxic pollutants listed in 40 CFR 122 Appendix D (Table II and Table III) are not flow composited. This is a violation of your Permit as stated in Part III, Section 7. C. 1.

4. Annual reports of biosolids and soil analysis do not include pH, as required in your Permit Part III, Section 8. B. 1. a. and b.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Branch of this Department at the following address:

Ms. Cindy Garner, Technical Assistance Manager
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by May 22, 2009

Additionally, the following items were noted during the inspection but <u>are not</u> permit violations.

1. A pump in the settle sewage building was observed leaking. The leak is contained by the building but should be repaired.
2. The ring in an intermediate clarifier is buckled and in need of maintenance.
3. Media in the west biotower is broken and needs to be replaced.
4. Material collects in sampler tubing and can result in inconsistent samples. The sampler tubing should be cleaned or replaced at regular intervals.

For additional information you may contact the enforcement branch by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 479-968-7339.

Sincerely,

Amy Beck
District 5 Field Inspector
Water Division

cc: Water Division Enforcement Branch
Water Division Permits Branch
Larry Collins, Russellville City Corp – Operations Manager

EPA

Form Approved
OMB No. 2040-0003

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Washington, D.C. 20460

NPDES Compliance Inspection Report

Section A: National Data System Coding

1	Transaction Code	2	NPDES	11	12	Yr/Mo/Day	17	18	Inspec. Type	19	Inspector	20	Fac. Type
	N	5	AR0021768			090422			C		S		1

Remarks

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	74	75	Reserved	80
	003			2		N		N					

Section B: Facility Data

Name and Location of Facility Inspected *(For industrial users discharging to POTW, also include POTW name and NPDES permit number)*	Entry Time/Date	Permit Effective Date
RUSSELLVILLE WWTP (CITY CORPORATION) **404 Jimmy Lile Road** **Russellville, AR 72802**	**0900 / 04-22-2009**	**4/1/2005**
	Exit Time/Date **1400 / 04-24-2009**	Permit Expiration Date **3/31/2010**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Larry Collins/ Operations Manager Randy Bradley/ Pretreatment Coordinator **Scott Ketchum/PCW Lead Operator Brandy Jennings/ Lab Tech**	**35° 14' 57" N,** **93° 06' 58" W**

Name, Address of Responsible Official/Title/Phone and Fax Number	Contacted
Craig No ble, (479) 968-2080 ext. 113 **RUSSELLVILLE CITY CORPORATION** **P.O. Box 3186** **Russellville, AR 72811**	Yes ☑ No ☐

Section C: Areas Evaluated During Inspection

(S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)

S	Permit	U	Flow Measurement	S	Operations & Maintenance	S	Sampling
S	Records/Reports	M	Self-Monitoring Program	S	Sludge Handling/Disposal	S	Pollution Prevention
S	Facility Site Review	S	Compliance Schedules	S	Pretreatment	S	Multimedia
S	Effluent/Receiving Waters	S	Laboratory	S	Storm Water	N	Other:

Section D: Summary of Findings/Comments (Attach additional sheets if necessary)

For soil and sludge analysis, pH is not being reported. All other reports are in compliance.

Influent samples are not flow composited.

Flow meter error is greater than 10% of actual calculated effluent flow.

Weir plates thicker than ¼ inch need a beveled downstream edge to ensure accurate discharge measurement. The plant's weir is 3/8 inch thick and is not beveled.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Amy Beck Amy Beck	**Arkansas Department of Environmental Quality / Russellville / 479-968-7339 / 479-968-7321**	**May 4, 2009**
Signature of Reviewer	Agency/Office/Phone and Fax Numbers	Date

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	☑Y ☐N ☐NA ☐NE
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	☐Y ☐N ☑NA ☐NE
3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	☑Y ☐N ☐NA ☐NE
4. ALL DISCHARGES ARE PERMITTED:	☑Y ☐N ☐NA ☐NE

SECTION B: RECORDKEEPING AND REPORTING EVALUATION

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y ☐N ☐NA ☐NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	☐S ☑M ☐U ☐NA ☐NE
a. DATES AND TIME(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
b. EXACT LOCATION(S) OF SAMPLING:	☑Y ☐N ☐NA ☐NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y ☐N ☐NA ☐NE
d. ANALYTICAL METHODS AND TECHNIQUES:	☑Y ☐N ☐NA ☐NE
e. RESULTS OF CALIBRATIONS:	☑Y ☐N ☐NA ☐NE
f. RESULTS OF ANALYSES: **For soil and sludge analysis, pH is not being reported. All other satisfactory.**	☐Y ☑N ☐NA ☐NE
g. DATES AND TIMES OF ANALYSES:	☑Y ☐N ☐NA ☐NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y ☐N ☐NA ☐NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	☑S ☐M ☐U ☐NA ☐NE
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	☑S ☐M ☐U ☐NA ☐NE
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	☑Y ☐N ☐NA ☐NE

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. TREATMENT UNITS PROPERLY OPERATED:	☑S ☐M ☐U ☐NA ☐NE
2. TREATMENT UNITS PROPERLY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	☑S ☐M ☐U ☐NA ☐NE
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	☑S ☐M ☐U ☐NA ☐NE
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	☑Y ☐N ☐NA ☐NE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	☑Y ☐N ☐NA ☐NE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	☑Y ☐N ☐NA ☐NE
11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: **Feb. 2008 lift station**	☑Y ☐N ☐NA ☐NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED:	☑Y ☐N ☐NA ☐NE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	☑Y ☐N ☐NA ☐NE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	☑Y ☐N ☐NA ☐NE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: **TSS**	☑Y ☐N ☐NA ☐NE

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
DETAILS:	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☑Y ☐N ☐NA ☐NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: **Influent samples are not flow composited.**	☐Y ☑N ☐NA ☐NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☑Y ☐N ☐NA ☐NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☑Y ☐N ☐NA ☐NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☑Y ☐N ☐NA ☐NE
b. PROPER PRESERVATION TECHNIQUES USED:	☑Y ☐N ☐NA ☐NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☑Y ☐N ☐NA ☐NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐Y ☐N ☑NA ☐NE

SECTION E: FLOW MEASUREMENT

PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☐S ☐M ☑U ☐NA ☐NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: **5 ft rectangular weir with end constrictions, not beveled.**	☐Y ☑N ☐NA ☐NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☑Y ☐N ☐NA ☐NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: **>10% error**	☐Y ☑N ☐NA ☐NE
4. CALIBRATION FREQUENCY ADEQUATE:	☑Y ☐N ☐NA ☐NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☑Y ☐N ☐NA ☐NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☑Y ☐N ☐NA ☐NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y ☐N ☐NA ☐NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☑Y ☐N ☐NA ☐NE
9. HEAD MEASURED AT PROPER LOCATION:	☑Y ☐N ☐NA ☐NE

SECTION F: LABORATORY

PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS		☑S ☐M ☐U ☐NA ☐NE
DETAILS:		
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :		☑Y ☐N ☐NA ☐NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:		☐Y ☐N ☑NA ☐NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:		☑Y ☐N ☐NA ☐NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:		☑Y ☐N ☐NA ☐NE
5. DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☑Y ☐N ☐NA ☐NE
6. SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:		☐Y ☑N ☐NA ☐NE
7. COMMERCIAL LABORATORY USED: **Yes, for soil samples, sludge samples, and biomonitoring**		☑Y ☐N ☐NA ☐NE
a. LAB NAME: **EEG, Inc.**	**Hurther and Associates, Inc.**	
b. LAB ADDRESS: **220 N. Knoxville, Russellville, AR 72801**	**1156 N. Bonnie Brae, Denton, Texas 76201**	
c. PARAMETERS PERFORMED: **soil and sludge samples**	**Biomonitoring**	
8. BIOMONITORING PROCEDURES ADEQUATE:		☑Y ☐N ☐NA ☐NE
a. PROPER ORGANISMS USED:		☑Y ☐N ☐NA ☐NE
b. PROPER DILUTION SERIES FOLLOWED:		☑Y ☐N ☐NA ☐NE
c. PROPER TEST METHODS AND DURATION:		☑Y ☐N ☐NA ☐NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:		☑Y ☐N ☐NA ☐NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS

BASED ON VISUAL OBSERVATIONS ONLY — ☑S ☐M ☐U ☐NA ☐NE

DETAILS: **No sludge deposits observed in receiving stream.**

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	no	no	no	not persistent	no	light brown	

SECTION H: SLUDGE DISPOSAL

SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS — ☑S ☐M ☐U ☐NA ☐NE

DETAILS:

1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY: ☑S ☐M ☐U ☐NA ☐NE
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503: ☑S ☐M ☐U ☐NA ☐NE
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: **hay field**

SECTION I: SAMPLING INSPECTION PROCEDURES

SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS — ☐S ☐M ☐U ☐NA ☑NE

DETAILS:

1. SAMPLES OBTAINED THIS INSPECTION: ☐Y ☑N ☐NA ☐NE
2. TYPE OF SAMPLE: ☐GRAB:__ ☐COMPOSITE:__ METHOD:__ FREQUENCY:
3. SAMPLES PRESERVED: ☐Y ☐N ☑NA ☐NE
4. FLOW PROPORTIONED SAMPLES OBTAINED: ☐Y ☐N ☑NA ☐NE
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE: ☐Y ☐N ☑NA ☐NE
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE: ☐Y ☐N ☑NA ☐NE
7. SAMPLE SPLIT WITH PERMITTEE: ☐Y ☐N ☑NA ☐NE
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED: ☐Y ☐N ☑NA ☐NE
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT: ☐Y ☐N ☑NA ☐NE

SECTION J: STORM WATER POLLUTION PREVENTION PLAN

STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS — ☐S ☐M ☐U ☑NA ☐NE

DETAILS: **Facility has no exposure certification at this time.**

1. SWPPP UPDATED AS NEEDED:__ DATE OF LAST UPDATE: ☐Y ☐N ☑NA ☐NE
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS: ☐Y ☐N ☑NA ☐NE
3. POLLUTION PREVENTION TEAM IDENTIFIED: ☐Y ☐N ☑NA ☐NE
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED: ☐Y ☐N ☑NA ☐NE
5. LIST OF POTENTIAL POLLUTANT SOURCES: ☐Y ☐N ☑NA ☐NE
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS: ☐Y ☐N ☑NA ☐NE
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED: ☐Y ☐N ☑NA ☐NE
8. LIST OF STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
9. LIST OF NON-STRUCTURAL BMPS: ☐Y ☐N ☑NA ☐NE
10. BMPS PROPERLY OPERATED AND MAINTAINED: ☐Y ☐N ☑NA ☐NE
11. INSPECTIONS CONDUCTED AS REQUIRED: ☐Y ☐N ☑NA ☐NE

FLOW CALCULATION SHEET

Date: **4-22-2009** Time: **10:20 a**

Head in Inches: **9.36** Feet: **0.78**

Type & Size of Primary Flow Measurement Device: 5 ft weir with end contractions

Name & Model of Secondary Flow Measurement Device: **Eastech Badger Vantage 2210 flow meter**

Date of last Calibration of Secondary Flow Device: **01-26-2009**

Recorded Flow at Date & Time Listed Above: **6.37** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **7.181**

(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

$$\% \text{ Error} = \frac{\text{Recorded Value} - \text{Calculated Value}}{\text{Calculated Value}} \times 100$$

$$\% \text{ Error} = \frac{7.181 - 6.37}{7.181} \times 100$$

$$\% \text{ Error} = \frac{0.811}{7.181} \times 100$$

% Error = 0.113 X 100

% Error = **11.3** %

Comments: **See permit Part II Section C. 2.**

DMR Calculation Check

Reporting Period: **From** **08** (Year) **11** (Month) **01** (Day) **To** **08** (Year) **11** (Month) **30** (Day)

Parameter Checked: **CBOD5**

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	**95**	**2.4**	**2.9**
Calculated Value:	**95**	**2.4**	**2.9**
Permit Value:	**913**	**15**	**23**

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period: From 09 (Year) 02 (Month) 01 (Day) **To** 09 (Year) 02 (Month) 28 (Day)

Parameter Checked: TSS

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:	1470	28.9	30
Calculated Value:	1470	27.1	30
Permit Value:	1217	20	30

If calculated value does not equal reported value, explain:
The monthly NPDES report supplied shows that TSS samples were taken more often than required by the permit. All samples for the month should be used in calculating the monthly average. By omitting the 3 weekend samples in February, the monthly average concentration is 28.19 mg/l.
I am not certain how the reported value was calculated.

City Corporation
RW&SS

CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105
FAX (479) 968-3265

May 21, 2009

Cindy Garner, Technical Assistance Manager
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock Arkansas 72118-5317

RE: AFIN: 58-00105 NPDES Permit No: AR0021768

Dear Ms. Garner:

On April 22, 2009, Ms Amy Beck ADEQ District 5 Field Inspector, Mr. Greg Kremers ADEQ District 5 Field Inspector and Mr. Dale Washam ADEQ Pollution Control Inspector Supervisor, inspected City Corporation's wastewater treatment facilities. Below are City Corporation's response to the violations as noted in Ms. Beck's letter dated May 6, 2009.

1. **Violation**: The flow meter deviation from the actual flow was greater than 10% error. This is a violation of Part II.C.2 of the permit.

   Response: To ensure compliance City Corporation has contacted OIC, from Little Rock Arkansas to calibrate the effluent flow meter. This calibration was completed May 19, 2009.

   Note: On January 26, 2009 the effluent flow meter was calibrated and certified by Porterfield Inc. of Little Rock, Arkansas. This was the annual certification test as required in the City Corporation Permit. To the best of our knowledge the device was properly calibrated and was certified. As stated previously, OIC has calibrated and made the repairs.

2. **Violation**: Weir plates thicker than ¼ inch need a beveled downstream edge to ensure an accurate discharge measurement (ISCO Open Channel Flow Measurement Handbook, Chapter 3). The plant's weir is 3/8 inch thick and is not beveled. This is a violation of your Permit as stated in Part II, Section C.2.

   Response: During the time of this inspection the flow at the wastewater treatment plant was such that the actual weir plate could not be seen, the side plates are thicker than ¼ inch and it was this plate that the inspectors could see at the time of the inspection. City Corporation staff found the actual weir plate to be ¼ inch; thereby, the need for a bevel plate is not necessary.

3. **Violation**: Influent samples collected to detect the presence of the toxic pollutants listed in 40 CFR 122 Appendix D (Table II and Table III) are not flow composited. This is a violation of your Permit as stated in Part III, Section 7.C.1.

   Response: City Corporation's engineering staff will determine the necessary changes to the wiring and SCADA to connect the influent flow meter to the composite sampler used to collect the stated samples. This work will be completed by the week of June 1, 2009.

4. **Violation**: Annual report of biosolids and soil analysis do not include pH, as required in your Permit Part III, Section 8.B.1.a. and b.

   Response: City Corporation's lab analyst did the required analysis of the biosolids and soil. City Corporation did fail to include these analyses with the 2009 annual reports. The annual reports will be corrected and mailed to ADEQ by the week of June 1, 2009.

In addition to the above violation responses, City Corporation offers the following to the noted items as outlined in Ms. Beck's letter:

1. A pump in the settle sewage building was observed leaking. The leak is contained by the building but should be repaired.

   Response: The above-mentioned pump has been repaired and the area cleaned.

2. The ring in an intermediate clarifier is buckled and in need of repair.

   Response: City Corporation will hire a contractor to make the necessary repairs to the clarifier; this work will be completed by June 15, 2009.

3. Media in the west biotower is broken and needs repair.

   Response: City Corporation and our engineering staff are in the process of locating a vendor for media. Once a vendor is determined, new media will be ordered and necessary repairs made.

4. Material collects in sampler tubing and can result in inconsistent samples. The sampler tubing should be cleaned or replaced at regular intervals.

   Response: A new preventative maintenance ticket has been developed and this tubing will be changed or cleaned once a month.

Should you have any questions please contact Larry Collins, Operations Manager at (479) 968-2080 Ext 132.

Sincerely,

Craig Noble

General Manager

City Corporation
RW&SS

P.O. BOX 3186 • 205 WEST THIRD PLACE
RUSSELLVILLE, ARKANSAS 72811-318

CERTIFIED MAIL™

7008 1300 0002 2519 8396

05/21/2008
Mailed From 72801
US POSTAGE

Cindy Garner
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

72116$5317 R015

ADEQ

A R K A N S A S
Department of Environmental Quality

June 16, 2009

Craig Noble, General Manager
City Corporation
Russellville Water and Sewer System
P. O. Box 3186
Russellville, AR 72118-5317

RE: NPDES Permit AR0021768, AFIN 58-00105
Response to Inspection

Dear Mr. Noble:

ADEQ has received your response to the April 22, 2009 routine compliance inspection of your facility by our District Field Inspector, Amy Beck. Your letter appears to adequately address the discrepancies identified during this inspection.

The Department will keep the inspection and response on file and will consider them as required by the Pollution Control and Ecology Commission Regulation No. 7, Civil Penalties. This regulation requires ADEQ to consider the past history of your company and how expeditiously the violations were addressed in determining any civil penalty that may be necessary for any violations.

Thank you for your attention to this matter. If we need further information, we will contact you. Should you have any questions, feel free to contact me by phone at 501-682-0632 or e-mail at robertsa@adeq.state.ar.us. In any written correspondence to this Department, please refer to NPDES Permit AR0021768 and AFIN 58-00105.

Sincerely,

Anne Roberts

Anne Roberts
Enforcement Administrator
Enforcement Branch
Water Division