



ARKANSAS
Department of Environmental Quality

January 18, 2011

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 December 28, 2010, I performed a routine compliance inspection of the waste water treatment facility in response to a complaint. The complaint, alleging bio-solids were being applied on an unapproved field, was found to be invalid. This inspection was conducted in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The following violations were revealed:

Record review shows various effluent limit violations for December 2009, January, May, June, and July 2010. This is a violation of Part I, Section A of your permit. These violations were reported with your monthly DMRs and no further action is required.

Additionally, this inspection revealed that required soil analysis and reporting schedules were changed in your permit effective October 1, 2010. These changes were not listed in the permit Fact Sheet - "Significant Changes from the Previously Issued Permit" (page 4 of Fact Sheet). You should carefully review Part II, 9. N. Table III of the permit for changes. Please be advised future inspections will require full compliance with soil monitoring conditions.

Finally, the following items were noted during the inspection but are not permit violations.

1. A significant amount of plastic solid waste was observed in the "City Corp" application field. The plastic should be removed and disposed of properly.
2. The skimmers on the south primary clarifier and the north final clarifier need to be adjusted closer to the baffle to effectively collect and dispose of floating solids. At the time of this inspection a slight (approximate 1 inch) gap was observed between the clarifier's skimmer and baffle.

Craig Noble, RUSSELLVILLE CITY CORPORATION

January 18, 2011

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3. In August 2008, City Corporation was issued a construction permit to replace two bar screens under permit tracking number ARR0021768C. The screens have been replaced but the permit is still active. Please contact the Department's permit branch (501-682-0622) to terminate this permit.

The above items require your immediate attention. Please submit a written response to these findings to Ms. Cindy Garner, Water Division Enforcement Branch Manager. The response should be mailed to the address on the previous page.

Your response should contain detailed documentation, including photographs, 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 January 28, 2011.

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



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

Form Approved
OMB No. 2040-0003

NPDES Compliance Inspection Report

Section A: National Data System Coding

| | | | | | |
|--|-------------|----------------------------|--------------|--------------------------|-----------|
| Transaction Code | NPDES | Yr/Mo/Day | Inspec. Type | Inspector | Fac. Type |
| 1 N 2 5 3 A R 0 0 2 1 7 6 8 11 12 1 0 1 2 2 8 17 18 C 19 S 20 1 | Remarks | | | | |
| | | | | | |
| Inspection Work Days | | Facility Evaluation Rating | | BI QA -----Reserved----- | |
| 67 0 0 2 69 | 70 3 | 71 D 72 N 73 | 74 75 | 80 | |

Section B: Facility Data

| | | |
|--|--|--|
| Name and Location of Facility Inspected (<i>For industrial users discharging to POTW, also include POTW name and NPDES permit number</i>) RUSSELLVILLE WWTP (CITY CORPORATION) 404 Jimmy Lile Road Russellville, AR 72802 | Entry Time/Date 0900 / 12-28-2010 | Permit Effective Date 10/01/2010 |
| Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s) Larry Collins/ Operations Manager Randy Bradley/ Pretreatment Coordinator Ricky Biffle/ Training Operator, Maintenance Brandy Jennings/Lab Tech Charlotte Petrick/Lab, Pretreatment Insp. | Exit Time/Date 1445 / 12-29-2010 | Permit Expiration Date 09/30/2015 |
| Name, Address of Responsible Official/Title/Phone and Fax Number Craig Noble, (479) 968-2080 ext. 113 RUSSELLVILLE CITY CORPORATION P.O. Box 3186 Russellville, AR 72811 | Contacted Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> | Other Facility Data 35° 14' 57" N, 93° 06' 58" W |

Section C: Areas Evaluated During Inspection

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

| | | | | | | | |
|---|---------------------------|---|-------------------------|---|--------------------------|---|----------------------|
| S | Permit | S | Flow Measurement | S | Operations & Maintenance | M | Sampling |
| S | Records/Reports | S | 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)

1. Record review shows permit violations have been reported as required.
2. Soil monitoring requirements have changed and should be carefully reviewed in order to comply with the permit. See Part II, 9. N. Table III of the permit
3. City Corporation has made significant strides in indentifying and ultimately correcting problems in the collection system.
4. Trash should be removed from the "City Corp" land application field south of the treatment plant.
5. Facility should terminate construction permit AR0021768C.

| | | |
|---|---|---------------------------------|
| Name(s) and Signature(s) of Inspector(s) Amy Beck | Agency/Office/Telephone/Fax Arkansas Department of Environmental Quality / Russellville / 479-968-7339 / 479-968-7321 | Date January 12, 2011 |
| 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: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ALL DISCHARGES ARE PERMITTED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> 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: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. DATES AND TIME(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. EXACT LOCATION(S) OF SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. NAME OF INDIVIDUAL PERFORMING SAMPLING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| d. ANALYTICAL METHODS AND TECHNIQUES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| e. RESULTS OF CALIBRATIONS: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| f. RESULTS OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| g. DATES AND TIMES OF ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| h. NAME OF PERSON(S) PERFORMING ANALYSES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION C: OPERATIONS AND MAINTENANCE

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

S M U NA NE

DETAILS:

- | | |
|--|---|
| 1. TREATMENT UNITS PROPERLY OPERATED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. TREATMENT UNITS PROPERLY MAINTAINED: <u>Skimmer needs to be adjusted on south primary clarifier and north final clarifier</u> | <input type="checkbox"/> S <input checked="" type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. ALL NEEDED TREATMENT UNITS IN SERVICE: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: | <input checked="" type="checkbox"/> S <input type="checkbox"/> M <input type="checkbox"/> U <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE <u>COLLECTION SYSTEM</u> IN THE LAST YEAR: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: <u>See page 10 – Further information</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |

SECTION D: SAMPLING

PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS S M U NA NE

DETAILS:

| | |
|--|--|
| 1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT: <u>7 parameters not analyzed for soil prior to application as required Table III (page 6 of Part II in permit).</u> | <input type="checkbox"/> Y <input checked="" type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SAMPLE COLLECTION PROCEDURES ADEQUATE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. SAMPLES REFRIGERATED DURING COMPOSITING: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| b. PROPER PRESERVATION TECHNIQUES USED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> 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: <u>Y</u> TYPE OF DEVICE: <u>5 ft rectangular weir with end contractions.</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. CALIBRATION FREQUENCY ADEQUATE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 9. HEAD MEASURED AT PROPER LOCATION: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> 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) : | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input checked="" type="checkbox"/> NA <input type="checkbox"/> NE |
| 3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 4. QUALITY CONTROL PROCEDURES ADEQUATE: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 5. DUPLICATE SAMPLES ARE ANALYZED \geq 10% OF THE TIME: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 6. SPIKED SAMPLES ARE ANALYZED \geq 10% OF THE TIME: | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| 7. COMMERCIAL LABORATORY USED: <u>Yes, for soil samples, sludge samples, and biomonitoring</u> | <input checked="" type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input type="checkbox"/> NE |
| a. LAB NAME: <u>EEG, Inc.</u> | <u>Hurther and Associates, Inc.</u> |
| b. LAB ADDRESS: <u>220 N. Knoxville, Russellville, AR 72801</u> | <u>1156 N. Bonnie Brae, Denton, Texas 76201</u> |
| c. PARAMETERS PERFORMED: <u>soil, sludge, some NO3-N, Cu, Zn samples</u> | <u>Biomonitoring</u> |
| 8. BIOMONITORING PROCEDURES ADEQUATE: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| a. PROPER ORGANISMS USED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| b. PROPER DILUTION SERIES FOLLOWED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| c. PROPER TEST METHODS AND DURATION: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> NE |
| d. RETESTS AND/OR TRE PERFORMED AS REQUIRED: | <input type="checkbox"/> Y <input type="checkbox"/> N <input type="checkbox"/> NA <input checked="" type="checkbox"/> 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 | slight | 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: pasture

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 is meeting no exposure requirements 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: | 12-28-2010 | Time: | 12:00 p | |
|-------|-------------------|-------|----------------|--|

| | | | | |
|-----------------|------------|-------|-------------|--|
| Head in Inches: | 6.6 | Feet: | 0.55 | |
|-----------------|------------|-------|-------------|--|

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: **07-28-2010**

| | | |
|--|-------------|-----------------------|
| Recorded Flow at Date & Time Listed Above: | 4.26 | (Facility Flow Meter) |
|--|-------------|-----------------------|

| | | |
|--|--------------|--|
| Calculated Flow at Date & Time Listed Above: | 4.292 | |
|--|--------------|--|

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

| | | | | | |
|-----------|------------------|---|------------------|-------|--|
| % Error = | Recorded Value | - | Calculated Value | X 100 | |
| | Calculated Value | | | | |

| | | | | | |
|-----------|-------|---|-------|-------|--|
| % Error = | 4.26 | - | 4.292 | X 100 | |
| | 4.292 | | | | |

| | | | | | |
|-----------|-------|--|--|-------|--|
| % Error = | -0.32 | | | X 100 | |
| | 4.292 | | | | |

| | | | | | |
|-----------|---------|--|--|-------|--|
| % Error = | -0.0074 | | | X 100 | |
|-----------|---------|--|--|-------|--|

| | | | | | |
|-----------|--------------|---|--|--|--|
| % Error = | -0.74 | % | | | |
|-----------|--------------|---|--|--|--|

| | |
|-----------|--|
| Comments: | |
|-----------|--|

NPDES Compliance Inspection Report Further Explanation

- During the inspection of the biosolid application field a significant amount of plastic trash was noted on the field named “City Corp”. Mr. Bradley surmised the trash had passed through the treatment system to the sludge press prior to the 2008 bar screen upgrade. No plastics or trash was observed coming through the sludge press at the time of this inspection. During the exit interview, Mr. Noble stated the trash would be removed.
- The facility is under CAO (LIS no. 09-146) to reduce SSO occurrences and improve the collection system. At the time of this inspection, City Corporation has made significant progress in achieving this goal. The evaluation of the collection system has been completed, priority basins have been identified, hydraulic modeling, lift station analysis, and system wide flow study is complete. City Corporation has hired an outside contractor to develop and implement a corrective plan. Additionally, City Corp has created a three employee inflow/infiltration team to identify and correct small problems in the collection system. City Corp is actively pursuing funding options. At this time the facility is ahead of the CAO schedule.
- Inspection reveals the soil monitoring requirements of the current permit are different from the previous permit. These changes were not discussed with the facility and they were unaware of the changes. I discussed with Mr. Bradley the monitoring frequency for Conductivity, Cation Exchange Capacity, Nitrate-Nitrogen, Phosphorus, pH, Potassium, and Magnesium has changed to “prior to application”. Additionally Chromium and Molybdenum have been added as required annual monitoring parameters. These requirements are detailed in Part II, 9. N. Table III of the permit.

Water Division NPDES Photographic Evidence Sheet

Location: City Corporation WWTP in Russellville, AR

Photographer: Amy Beck **Witness:** None

Photo # 1 **Of** 5 **Date:** 12/28/2010 **Time:** 1124

Description: Gap observed between the south primary clarifier skimmer and baffle.



Photographer: Amy Beck **Witness:** None

Photo # 2 **Of** 5 **Date:** 12/28/2010 **Time:** 1151

Description: Gap observed between the north final clarifier skimmer and baffle.



| | | | | | | | |
|---|--|--|--|--|--|--|--|
| Water Division NPDES Photographic Evidence Sheet | | | | | | | |
|---|--|--|--|--|--|--|--|

| | | | | | | | |
|------------------|---|--|--|--|--|--|--|
| Location: | City Corporation WWTP in Russellville, AR | | | | | | |
|------------------|---|--|--|--|--|--|--|

| | | | | | | | |
|----------------------|----------|--|--|-----------------|------|--|--|
| Photographer: | Amy Beck | | | Witness: | None | | |
|----------------------|----------|--|--|-----------------|------|--|--|

| | | | | | | | |
|----------------|---|-----------|---|--------------|------------|--------------|------|
| Photo # | 3 | Of | 5 | Date: | 12/28/2010 | Time: | 1219 |
|----------------|---|-----------|---|--------------|------------|--------------|------|

| | | | | | | | |
|---------------------|---|--|--|--|--|--|--|
| Description: | Solids from the sludge press did not contain a significant amount of plastics or other trash. | | | | | | |
|---------------------|---|--|--|--|--|--|--|



| | | | | | | | |
|----------------------|----------|--|--|-----------------|------|--|--|
| Photographer: | Amy Beck | | | Witness: | None | | |
|----------------------|----------|--|--|-----------------|------|--|--|

| | | | | | | | |
|----------------|---|-----------|---|--------------|------------|--------------|------|
| Photo # | 4 | Of | 5 | Date: | 12/28/2010 | Time: | 1403 |
|----------------|---|-----------|---|--------------|------------|--------------|------|

| | | | | | | | |
|---------------------|---|--|--|--|--|--|--|
| Description: | Plastics and other trash were observed in the "City Corp" application field – south of the plant. | | | | | | |
|---------------------|---|--|--|--|--|--|--|



Water Division NPDES Photographic Evidence Sheet

| | | | | | | | |
|----------------------|--|-----------|---|-----------------|------------|--------------|------|
| Location: | City Corporation WWTP in Russellville, AR | | | | | | |
| Photographer: | Amy Beck | | | Witness: | None | | |
| Photo # | 5 | Of | 5 | Date: | 12/28/2010 | Time: | 1403 |
| Description: | Close up of items observed in the "City Corp" application field. | | | | | | |





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

March 16, 2011

Ms. Cindy Garner
Enforcement Administrator
NPDES Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118

RE: Inspection of RUSSELLVILLE CITY CORPORATION
NPDES Permit No. AR0021768, AFIN 58-00105

Dear Ms. Garner:

This letter shall serve as City Corporation's response to the noted items as outlined during the inspection of our Pollution Control Works on December 28, 2010 by Amy Beck, ADEQ, District 5 Field Inspector. The inspection letter of the findings of this inspection was received by City Corporation on March 14, 2011. We would offer the following findings and response

1. A significant amount of plastic solid waste was observed in the "City Corp" application field. The plastic should be removed and disposed of properly.
 - A. *These plastics have been removed and properly disposed. Our operators will continue to survey the application site and remove any additional plastics found. (Photos included)*

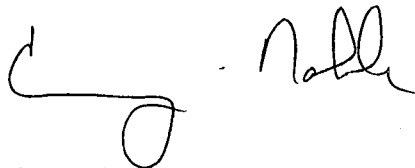
2. The skimmers on the south primary clarifier and the north final clarifier need to be adjusted closer to the baffle to effectively collect and dispose of floating solids. At the time of this inspection a slight (approximate 1 inch) gap was observed between the clarifier's skimmer and baffle.
 - A. *The skimmer on the south primary clarifier has been repaired (photo included). The north final clarifier skimmer repairs will require us to take the clarifier out of service to complete the needed repairs. These repairs will be completed by April 10, 2011.*

3. In August 2008, City Corporation was issued a construction permit to replace two bar screens under permit tracking number ARR0021768C. The screens have been replaced but the permit is still active. Please contact the Department's permit branch (501-682-0622) to terminate this permit.

A. These actions were completed on March 16, 2011.

If you have any further questions regarding this response or the inspection report, please contact Larry Collins at 479.968.2080, extension 132.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Noble". The signature is written in a cursive style with a large loop at the end of the first name.

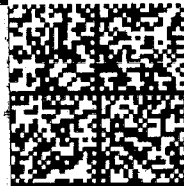
Craig Noble
General Manager

cc: Larry Collins
Randy Bradley
Ricky Biffle
File



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

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North Little Rock, AR 72118

72118+5337



