ADEQ
ARKANSAS
Department of Environmental Quality

January 4, 2013

Steve Mallet, General Manager
City Corporation - Russellville Water and Sewer System
P.O. Box 3186
Russellville, AR 72811

RE: Routine Compliance Inspections
AFIN: 58-00105, NPDES Permit No: AR0021768
NPDES Permit No: AR0021768C
NPDES Permit No: ARR000104
State Permit No: 5126-W

Dear Mr. Mallet:

On December 17 and 18, 2012, I performed a routine compliance inspection of the waste water treatment facility, an inspection of your dechlorination system construction, a stormwater inspection, and an inspection of your land application permit. These were conducted in accordance with the above referenced permits, the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. The inspection revealed the following:

AR0021768

1. Persistent foam was observed in the receiving stream approximately 250 feet downstream of outfall 001 in violation of Part I, Section A of the permit.
2. Laboratory control limits have not been established in accordance with 40 CFR Part 136, as required by your permit in Part III Section C. 3.
3. It was noted one of the clarifiers had a significant amount of algae growth. The algae should be removed from the weir plates.
4. It was noted a piece of one of the skimmer arms had recently broken. The skimmer arm should be repaired. At the time of this inspection, the skimmer was functioning and did not appear to be severely affecting the quality of the effluent.

AR0021768C

At the time of this inspection, construction had not begun on the dechlorination system. No issues noted.

ARR000104

1. On the first day of the inspection I observed a broken used oil container outside the fabrication shop. The container had been removed from the premises on the second day

of the inspection. No further action is needed. However, please be advised if any industrial materials are exposed to stormwater, you will not qualify for the No Exposure Certification for this permit.

5126-W

At the time of this inspection you were in compliance with the permit. Your annual report and 40 CFR 503 certification for 2012 are due by May 1, 2013.

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department. This response should contain 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 **January 18, 2013**.

If I can be any assistance, please contact me at beck@adeq.state.ar.us or 479-968-7339.

Sincerely,

Amy Beck

Amy Beck
District 5 Field Inspector
Water Division

EPA

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

NPDES Compliance Inspection Report

Form Approved
OMB No. 2040-0003
Approval Expires 7-31-85

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			121712			C		S		1

Remarks

67	Inspection Work Days	69	70	Facility Evaluation Rating	71	BI	72	QA	73	Reserved	74	75	Reserved	80
	002			3		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
City Corporation - Russellville Water and Sewer System **404 Jimmy Lile Road, Russellville, AR 72802**	**12:30 / 12-17-2012**	**October 1, 2010**
	Exit Time/Date **2:00 / 12-18-2012**	Permit Expiration Date **September 30, 2012**

Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)	Other Facility Data
Ricky Biffle/Maintenance Crew Lead; Randy Bradley/Pretreatment Coordinator; Charlotte Petrick/Lab Analyst; Larry Collins/Operations Manager	**35° 14' 56" N,** **93° 06' 58" W**
Name, Address of Responsible Official/Title/Phone and Fax Number **Steve Mallet** **P.O. Box 3186** **Russellville, AR 72811** **(479) 968-2080 ext. 113**	Contacted Yes ☑ No ☐
	PDS# 069485

Section C: Areas Evaluated During Inspection

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

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

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

1. Persistent foam was observed in the receiving stream, approximately 250 feet downstream of outfall 001.
2. Laboratory control limits must be established in accordance with 40 CFR Part 136.
3. It was noted one of the clarifiers had a significant amount of algae growth. The algae should be removed from the weir plates.
4. It was noted a piece of one of the skimmer arms had recently broken. The skimmer arm should be repaired. At the time of this inspection, the skimmer was functioning and did not appear to be severely affecting the quality of the effluent.

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Telephone/Fax	Date
Amy Beck **Amy Beck**	**Arkansas Dept. of Environmental Quality-** **Russellville Field Office** **(479) 968-7339/(479) 968-7321 (Fax)**	**January 3, 2013**
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:	☑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: **collection system**	☑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: **ongoing improvements**	☑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:	☐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:	☑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' rectangular weir with end contractions**	☑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:	☑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: **Need to establish control limits for duplicate analysis.**	☐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:	☑Y ☐N ☐NA ☐NE
a. LAB NAME: **EEG, Inc.**	
b. LAB ADDRESS: **220 N. Knoxville, Russellville, AR 72801**	
c. PARAMETERS PERFORMED: **Soil, biosolids, TP, Zn, Cu, Hg**	
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:

OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	No	No	Slight	Yes	No	Light Brown	

SECTION H: SLUDGE DISPOSAL

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

DETAILS: **Sludge disposal and land application addressed in permit 5126-W**

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: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):

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: **Stormwater addressed in permit ARR000104**

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: **12/17/12** Time: **2:00**

Head in Inches: _____ Feet: **0.65**

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

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

Recorded Flow at Date & Time Listed Above: **5.42 MGD** (Facility Flow Meter)

Calculated Flow at Date & Time Listed Above: **5.492 MGD**
(Flow is calculated using flow charts in: ISCO Open Channel Flow Measurement Handbook-5th Edition)

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

$$\% \text{ Error} = \frac{5.42 - 5.492}{5.492} \times 100$$

$$\% \text{ Error} = \frac{-0.072}{5.492} \times 100$$

$$\% \text{ Error} = -0.013 \times 100$$

% Error = **-1.31** %

Comments: **Secondary flow device shows calibration on 11/14/12.**

DMR Calculation Check

Reporting Period:	From	12	06	01	To	12	06	30
		Year	Month	Day		Year	Month	Day

Parameter Checked: TSS

	Loading	Concentration	
	Mass	Monthly	
	Mo. Avg. - lbs/day	Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	207.9	6.1	8.1
Calculated Value:	207.9	6.1	8.1
Permit Value:	913.2	15	22.5

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	From	12	07	01	To	12	07	31
		Year	Month	Day		Year	Month	Day

Parameter Checked: Total Recoverable Copper

	Loading Mass	Concentration Monthly	
	Mo. Avg. - lbs/day	Mo. Avg. - ug/l	7-day Avg. - ug/l
Reported Value:	0.27	8.0	8.0
Calculated Value:	0.27	8.0	8.0
Permit Value:	0.45	9.2	18.5

If calculated value does not equal reported value, explain:

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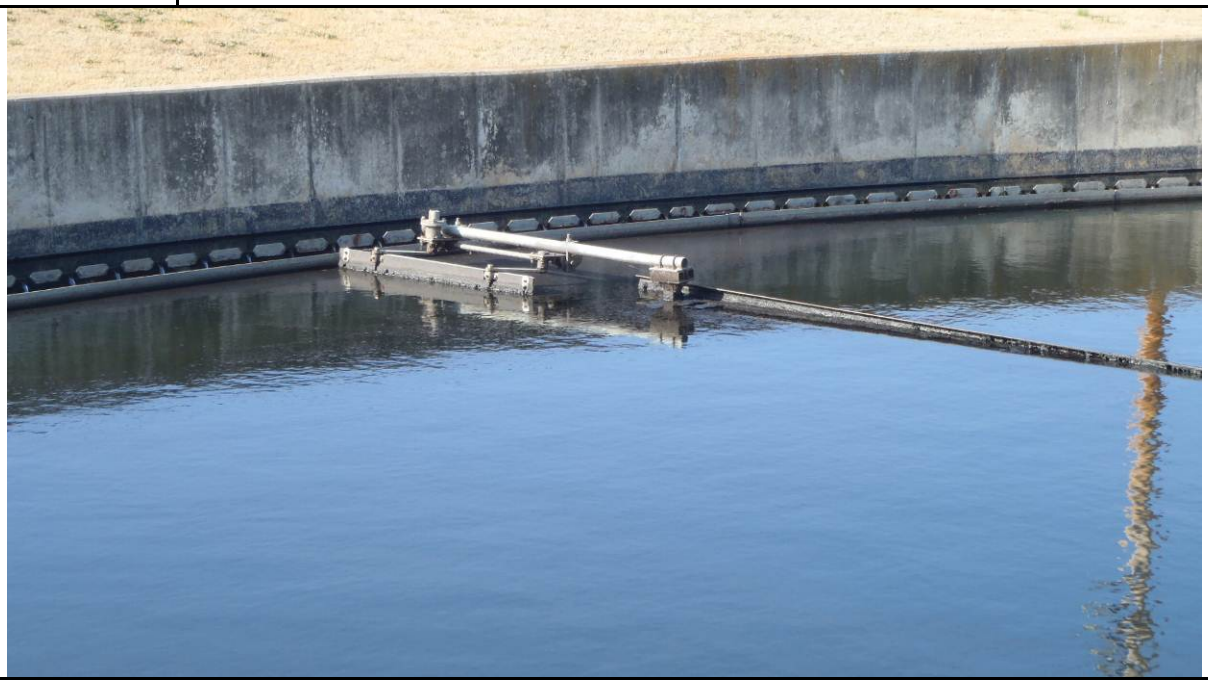
Photographic Evidence Sheet

Location:	City Corporation - Russellville Water and Sewer System						
Photographer:	Amy Beck			**Witness:**	None		
Photo #	1	**Of**	4	**Date:**	12/17/2012	**Time:**	1347
Description:	Algae observed in the clarifier should be maintained.						

Photographer:	Amy Beck			**Witness:**	None		
Photo #	2	**Of**	4	**Date:**	12/17/2012	**Time:**	1350
Description:	Metal plate broken off the skimmer arm on the secondary clarifier.						



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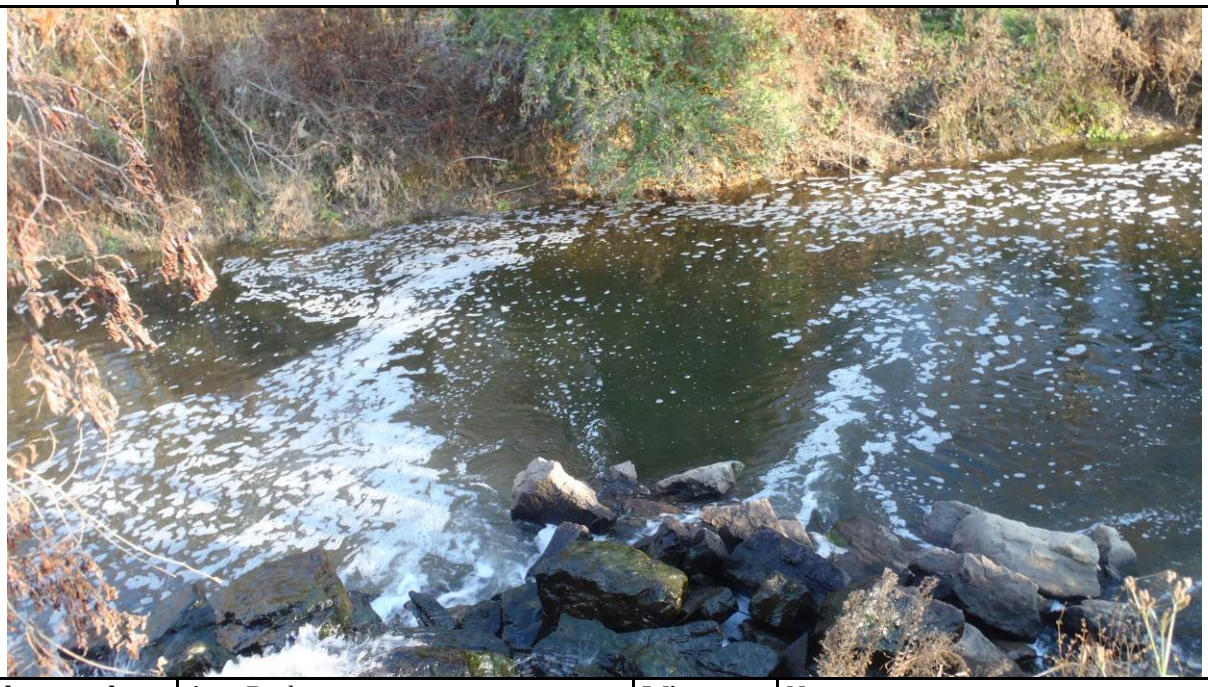
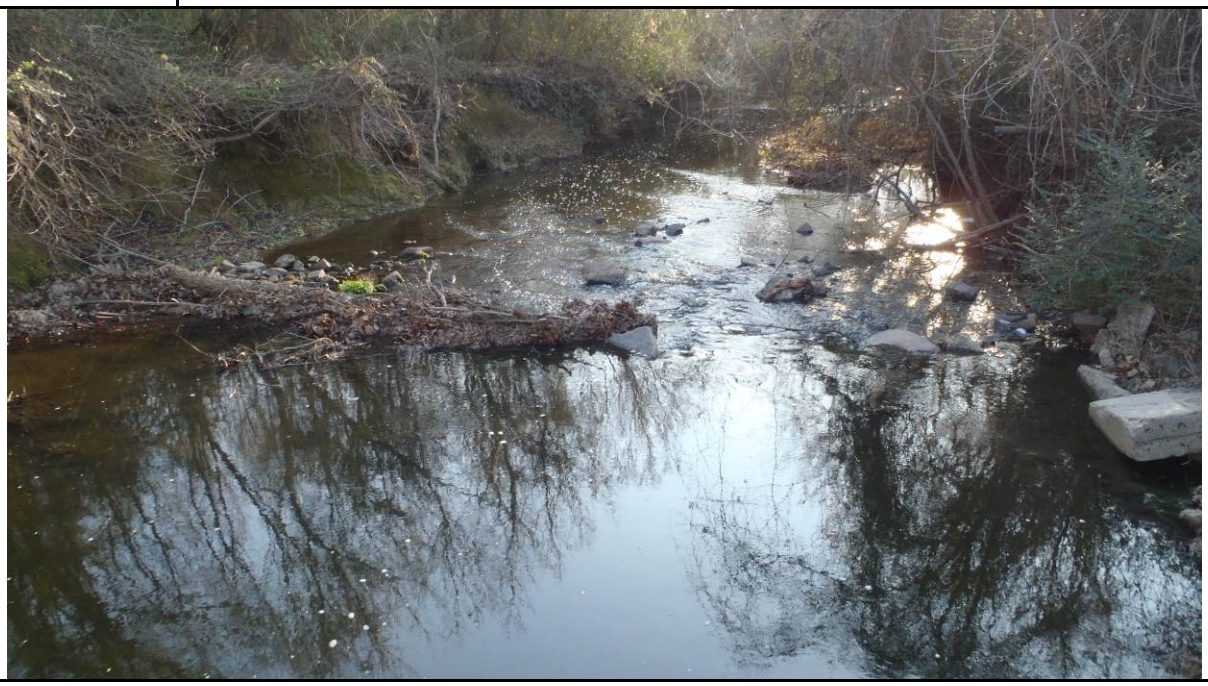
Department of Environmental Quality

Photographic Evidence Sheet

Location:	City Corporation - Russellville Water and Sewer System						
Photographer:	Amy Beck			**Witness:**	None		
Photo #	3	**Of**	4	**Date:**	12/17/2012	**Time:**	1542
Description:	Foam at the outfall.						



Photographer:	Amy Beck			**Witness:**	None		
Photo #	4	**Of**	4	**Date:**	12/17/2012	**Time:**	1545
Description:	Foam from outfall visible downstream of the bridge, approximately 250 feet downstream of the outfall.						



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ARKANSAS
Department of Environmental Quality

CERTIFIED MAIL: 91 7199 9991 7030 4906 0416

January 28, 2013

Steve Mallet, General Manager
City Corporation - Russellville Water and Sewer System
P.O. Box 3186
Russellville, AR 72811

RE: Failure to Respond to Inspection; AFIN: 58-00105
NPDES Permit No: AR0021768
NPDES Permit No: AR0021768C
NPDES Permit No: ARR000104
State Permit No: 5126-W

Dear Mr. Mallet:

A letter dated January 4, 2013 was sent by ADEQ to you. The letter outlined the findings of my December 17 and 18, 2012 inspection of the above referenced facility. The letter requested that a written response be submitted to the Water Division Inspection Branch of this Department by January 18, 2013. To date, no response has been received.

Please submit a written response by February 11, 2013. A copy of the inspection report has been included for your convenience.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-968-7339 or you may e-mail me at beck@adeq.state.ar.us.

Sincerely,

Amy Beck
Inspector
Water Division

cc: Enforcement Branch

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

January 30, 2013

Mr. Alan Anderson
Enforcement Analyst
Water Division/Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, Arkansas 72118

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

Dear Mr. Anderson:

This letter shall serve as written response to address the findings from the routine compliance inspection at our wastewater treatment plant on December 17 and 18, 2012 by ADEQ field inspector Amy Beck.

AR0021768

1. Persistent foam was observed in the receiving stream approximately 250 feet downstream of outfall 001 in violation of Part I, Section A of the permit
    a. Plant staff has started monitoring the outfall for foam each day during routine plant checks. Staff also continues to investigate the actual cause and will contact environmental scientist for assistance in correcting this issue.

2. Laboratory control limits have not been established in accordance with 40 CFR part 136, as required by your permit in Part III Section C.3
    a. Laboratory staff has reviewed our lab information software and determined that the control limits are established within this system. Staff has implemented these limits into the lab SOP's as of January 28, 2013.

3. It was noted one of the clarifiers had a significant amount of algae growth. The algae should be removed from the weir plates.
    a. Algae from the clarifier have been removed and weekly cleaning of clarifiers has been started to ensure minimum algae growth.

4. It was noted a piece of one of the skimmer arms had recently broken. The skimmer arm should be repaired. At the time of this inspection, the skimmer was functioning and did not appear to be severely affecting the quality of the effluent.
    a. Skimmer arm noted has been repaired by City Corporation maintenance staff. City Corporation will start new construction at our plant to address nutrient removal; during this phase of construction the final clarifiers will be refurbished with new skimmer mechanisms to improve sludge handling and removal.

Should you have any questions or need other info please contact Larry Collins, Operations Manager at 479-968-2080 ext 222.

Sincerely,

Steve Mallett
General Manager

cc: Larry Collins
Randy Bradley
Ricky Biffle
File

ADEQ

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

February 1, 2013

Steve Mallet, General Manager
City Corporation - Russellville Water and Sewer System
P.O. Box 3186
Russellville, AR 72811

RE: Response to Inspection
AFIN: 58-00105, Permit No.: AR0021768, AR0021768C, ARR000104, 5126-W

Dear Mr. Mallet:

I have reviewed the response pertaining to my December 17-18, 2012 inspection of the wastewater treatment facility. The information provided sufficiently addresses the violations referenced in my inspection report. At this time the Department has no further comment concerning this particular inspection. Acceptance of this response by the Department does not preclude any future enforcement action deemed necessary at this site or any other site.

If we need further information concerning this matter, we will contact you. Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 479-968-7339 or you may e-mail me at beck@adeq.state.ar.us.

Sincerely,

Amy Beck
District 5 Field Inspector
Water Division