ADEQ
ARKANSAS
Department of Environmental Quality

June 30, 2017

Steve Mallett, Chief Executive **Officer**
City Corporation
P.O. Box 3186
Russellville, AR 72811

RE: Russellville City Corporation Inspections (Pope Co)
AFIN: 58-00105 **Permit No.: AR0021768**
AR0021768C3
5126-W

Dear Mr. Mallett:

On June 8 and 9, 2017, I performed inspections of the above-referenced permits in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. Copies of the inspection reports are enclosed for your records.

Please refer to the "Summary of Findings" sections of each of the attached inspection reports and provide a written response for each violation that was noted. This response should be mailed to the attention of the Water Division Inspection Branch at the address at the bottom of this letter or e-mailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. This corrective action should be completed as soon as possible, and the written response with all necessary documentation (i.e., photos) is due by **July 14, 2017**.

If I can be of any assistance, please contact me at beck@adeq.state.ar.us or (479) 968-7339 ext. 16.

Sincerely,

Amy Beck

Amy Beck
District 5 Field Inspector
Water Division

ADEQ
ARKANSAS
Department of Environmental Quality

WATER DIVISION INSPECTION REPORT

AFIN: **58-00105** | PERMIT #: **AR0021768** | DATE: **6/8/2017**

COUNTY: **58 Pope** | PDS #: **097841** | MEDIA: **WN**

GPS LAT: **35.249132** LONG: **-93.116114** LOCATION: **Entrance**

FACILITY INFORMATION

NAME:
Russellville City Corporation
LOCATION:
404 Jimmy Lile Road
CITY:
Russellville

RESPONSIBLE OFFICIAL

NAME: / TITLE
Steve Mallett / Chief Executive Officer
COMPANY:
City Corporation
MAILING ADDRESS:
P.O. Box 3186
CITY, STATE, ZIP:
Russellville AR 72811
PHONE & EXT: / FAX:
479-968-2105 113 / 479-968-3265
EMAIL:
smallett@citycorporation.com

CONTACTED DURING INSPECTION: **Yes**

INSPECTION INFORMATION

FACILITY TYPE: **1 - Municipal**
INSPECTOR ID#: **36537 S - State**
FACILITY EVALUATION RATING: **3 - Satisfactory**
INSPECTION TYPE: **Compliance Evaluation**
DATE(S): **6/8/2017**
ENTRY TIME: **09:00**
EXIT TIME: **16:00**
PERMIT EFFECTIVE DATE: **9/1/2016**
PERMIT EXPIRATION DATE: **8/31/2021**

FAYETTEVILLE SHALE RELATED: **N**

FAYETTEVILLE SHALE VIOLATIONS: ***

INSPECTION PARTICIPANTS

NAME/TITLE/PHONE/FAX/EMAIL/ETC.:
Randy Bradley, Wastewater Operations Manager, 479-968-2080 ext. 224; rbradley@citycorporation.com;
Ches Jackson, Operator;
Tony Sanchez, City Corp. Lab

AREA EVALUATIONS

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

S	PERMIT	**S**	FLOW MEASUREMENT	**N**	STORMWATER
S	RECORDS/REPORTS	**S**	LABORATORY	**S**	FACILITY SITE REVIEW
M	OPERATION & MAINTENANCE	**S**	EFFLUENT/RECEIVING WATER	**S**	SELF-MONITORING PROGRAM
S	SAMPLING	**S**	SLUDGE HANDLING/DISPOSAL	**N**	PRETREATMENT
**	OTHER:				

SUMMARY OF FINDINGS

1. **DMR review shows several exceedances of effluent limits listed in Part I, Section A of the permit. Non-compliance reports have been submitted and no further action is required at this time.**

2. **Treatment components are not operating or not properly maintained as required by Part III, Section B. 1. of the permit. Specifically, neither the west grit remover nor the west primary clarifier is operational and algae need to be removed from secondary Clarifier 3.**

GENERAL COMMENTS

The treatment system consists of bar screens, grit removal, primary clarifiers, activated sludge, secondary clarifiers, chlorine disinfection, and sulfur dioxide dechlorination. Sludge is aerobically digested, dewatered through a belt press, and then processed through the Schwing Bioset process.

This inspection includes routine inspections of the treatment system, biosolids, lab, collection system, and construction project. I reviewed DMR from June 1, 2016 through May 31, 2017 with detailed record review for three months.

INSPECTOR'S SIGNATURE: Amy Beck **Amy Beck** DATE: **6/13/2017**

SUPERVISOR'S SIGNATURE: Kerri McCabe **Kerri McCabe** DATE: **6/29/2017**

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:	☑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:	☐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: **Y** TYPE OF DEVICE: **5 ft 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:	☑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: **Arkansas Analytical via EEG**	
b. LAB ADDRESS: **220 N. Knoxville, Russellville, AR**	
c. PARAMETERS PERFORMED: **Zn, Cu, Hg, As**	
8. BIOMONITORING PROCEDURES ADEQUATE: **WET test performed by PACE Analytical**	☑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	not persistent	no	light brown	--

SECTION H: SLUDGE DISPOSAL

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

DETAILS: **Facility is producing a Class A Exceptional Quality sludge. They are currently giving it to local farmers.**

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:

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: **06/08/2017** Time: **9:20**

Head in Inches: Feet: **0.78**

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

Name & Model of Secondary Flow Measurement Device: **Eastech Badger**

Date of last Calibration of Secondary Flow Device: **Nov 10, 2016**

Recorded Flow at Date & Time Listed Above: **7.17 MGD** (Facility Flow Meter)

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

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

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

$$\% \text{ Error} = \frac{7.17 - 7.181}{7.181} \times 100$$

$$\% \text{ Error} = \frac{-0.11}{7.181} \times 100$$

$$\% \text{ Error} = -0.0015 \times 100$$

% Error = **-0.15** %

Comments:

DMR Calculation Check

Reporting Period:	**From**	**2017** (Year)	**04** (Month)	**01** (Day)	**To**	**2017** (Year)	**04** (Month)	**30** (Day)

Parameter Checked: FCB

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	Concentration Monthly 7-day Avg. - mg/l
Reported Value:		1583	25,471
Calculated Value:		1583	25,471
Permit Value:	N/A	1000	2000

If calculated value does not equal reported value, explain:

DMR Calculation Check

Reporting Period:	**From**	**2016** (Year)	**10** (Month)	**01** (Day)	**To**	**2016** (Year)	**10** (Month)	**31** (Day)

Parameter Checked: **CBOD5**

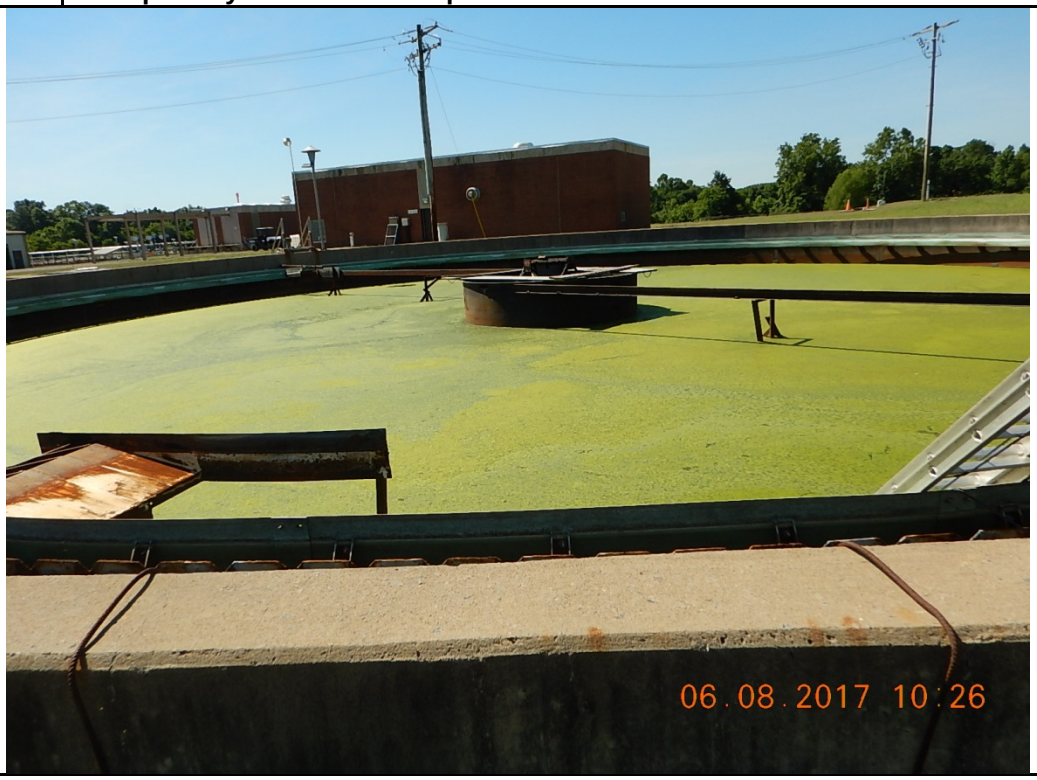
	Loading	**Concentration**	
	Mass	**Monthly**	
	Mo. Avg. - lbs/day	**Mo. Avg. - mg/l**	**7-day Avg. - mg/l**
Reported Value:	**186.3**	**5.4**	**7.0**
Calculated Value:	**184.5**	**5.4**	**6.98**
Permit Value:	**608.8**	**10.0**	**15.0**

If calculated value does not equal reported value, explain:

Slight difference probably due to rounding error.

Water Division Photographic Evidence Sheet					
Location:	**Russellville City Corporation**				
Photographer:	**Amy Beck**	Date:	**06/08/2017**	Time:	
Witness:	**Ches Jackson**			Photo #:	**1**
Description:	**West grit remover is not operational.**				

Photographer:	**Amy Beck**	Date:	**06/08/2017**	Time:	**1026**
Witness:	**Ches Jackson**			Photo #:	**2**
Description:	**West primary clarifier is not operational.**				



Water Division Photographic Evidence Sheet					
Location:	**Russellville City Corporation**				
Photographer:	**Amy Beck**	Date:	**06/08/2017**	Time:	**1129**
Witness:	**Ches Jackson**			Photo #:	**3**
Description:	**Algae on weir plate of secondary Clarifier 3.**				

From:	Randy Bradley
To:	Water-Inspection-Report
Cc:	Steve Mallett; Larry Collins
Subject:	Permit AR0021768, AFIN 58-00105
Date:	Thursday, July 13, 2017 1:22:33 PM
Attachments:	image001.png Inspection response to ADEQ 2017.pdf 2015 Biosolids report to ADEQ.pdf 2016 Biosolids report to ADEQ.pdf

Attached is the required response to the inspection of City Corporation on June 8 and 9, 2017.

Randy Bradley
Wastewater Operations Manager

City Corporation
Russellville Water & Sewer System
205 West Third Place
PO Box 3186
Russellville, AR 72811
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Phone 479.968.2080 Ext. 224
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Awarded 2016 People's Choice
"Best Drinking Water in North America"

CITY CORPORATION
RUSSELLVILLE WATER & SEWER

P. 479-968-2105
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"Award Winning Water"

July 13, 2017

Kerri McCabe
Inspector Supervisor
Water Division/Field Services - Inspection Branch
Arkansas Department of Environmental Quality
5301 Northshore Dr.
North Little Rock, Arkansas 72118

RE: Russellville City Corporation Inspections (Pope Co) NPDES Permit No. AR0021768, 5126-W, AFIN 58-00105

Dear Kerri:

This letter shall serve as City Corporation's written response for the violations noted during the inspection performed by Amy Beck on June 8 and 9, 2017. .

Violations:

1. DMR review shows several exceedances of effluent limits listed in Part 1, section A of the permit. Non-compliance reports have been submitted and no further actions is required at this time.

2. Treatment components are not operating or not properly maintained as required by Part III, Section B.1. of the permit. Specifically, neither the west grit remover nor the west primary clarifier is operational and algae need to be removed from secondary clarifier 3.

3. Two electrical cabinets are not properly maintained as required by Part III, Section B.1. of the permit. Specifically, the Darling, Inc. station's cabinet is rusted and needs to be replaced, and the Lost Corner station's cabinet is rusted and also positioned so stormwater can enter the cabinet. It needs to be raised and replaced.

4. Annual reports have not been submitted for 2015 or 2016 as required by Part II.17 of the permit.

5. The permit Responsible Official has not been updated as required by Part III, 24 of the permit. Please submit a Change of Authorization form to update Official(s).

205 W. 3rd Place
PO Box 3186
Russellville, AR 72811
citycorporation.com

CITY CORPORATION
RUSSELLVILLE WATER & SEWER

P. 479-968-2105
F. 479-968-3265
"Award Winning Water"

Response:

1. City Corporation is committed to correcting the issues with permit non-compliance. In 2016, we completed $18 million+ of improvements at the wastewater plant to address primarily Nitrates, TSS and Total Residual Chlorine as mandated in a 2009 Consent Administrative Order. While these improvements addressed the items noted and perform well to this point, the plant capacity with regards to design flow and loading was not addressed. We are two years into a $40 million+, 6 year plan to reduce peak flows at the plant, with the expectations that the plant will treat the projected, decreased wet weather flows. What we did not expect nor anticipate was a substantial increase in BOD loading to the plant, which has been documented as slowly and steadily increasing since 2014. We have determined that this increase in BOD loading well above our design loading is very likely the reason we are unable to effectively treat and meet our permit limits on a consistent basis. Understanding that an expansion of our plant and/or construction of site specific pretreatment facilities at our major BOD contributors is likely the solution to this issue, we have entered into a contract with Garver Engineers to evaluate the wastewater treatment plant and develop a computer model of the treatment process to be used as a diagnostic and predictive tool. We have met with our Board of Directors to discuss this item and all have agreed that this is our top priority and projected 2018 bond funds will be re-prioritized as necessary to fund such an expansion. We will keep ADEQ informed of each step along the way to receive necessary approvals and/or permit modifications

2. The West grit removal equipment has failed and due to old age, it is difficult to locate repair parts. City Corporation has in the 2018 capital budget to replace both the East and West grit removal equipment with new equipment. Staff is currently getting quotes for the new equipment and it will be ordered by the end of 2017. The West primary clarifier gear drive failed and a new one had to be ordered. The new unit arrived the week of June 19, 2017 and on June 29, 2017 the West primary was put in service. The algae noted in the secondary clarifiers has been removed and new procedures put in place to ensure the clarifiers are operated correctly.

3. Both cabinets noted in the inspection have been identified as needing replacement by our maintenance staff and are budgeted for repairs/replacement in this year's capital improvements. Repairs/replacement are schedule to be completed by January 2018.

4. Annual biosolids reports have been completed and submitted to ADEQ and copies are attached to this report.

5. The Request for Change of Authorization has been completed and submitted to ADEQ on June 26, 2017.

205 W. 3rd Place
PO Box 3186
Russellville, AR 72811
citycorporation.com

CITY CORPORATION
RUSSELLVILLE WATER & SEWER

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"Award Winning Water"

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

Sincerely,

Steve Mallett
Chief Executive Officer

cc: Larry Collins
Randy Bradley
File

205 W. 3rd Place
PO Box 3186
Russellville, AR 72811
citycorporation.com

CITY CORPORATION
RUSSELLVILLE WATER & SEWER

P. 479-968-2105
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"Award Winning Water"

July 13, 2017

Arkansas Department of Environmental Quality
Water Division, No-Discharge Section
5301 Northshore Dr.
North Little Rock, Arkansas 72118

RE: Permit No. 5126-W, AFIN 58-00105,

To whom it may concern:

This letter shall serve as City Corporation's Annual Biosolids Report for 2015 as required by permit listed above permit. During this reporting year City Corporation did not land apply any biosolids produced at our facility. City Corporation produced 470.93 dry metric ton of biosolids in 2015, 61.4 MT were disposed in landfill and 409.5 MT remaining were Class A EG. The required soil and waste analyses are enclosed.

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

Sincerely,

Steve Mallett
Chief Executive Officer

cc: Larry Collins
Randy Bradley
File

205 W. 3rd Place
PO Box 3186
Russellville, AR 72811
citycorporation.com

2015 Bio Solids Production

	Lbs (Dry weight)
Jan	9,959
Feb	44,869
Mar	30,925
Apr	115,908
May	134,490
Jun	103,313
Jul	102,446
Aug	113,318
Sep	85,248
Oct	108,150
Nov	81,016
Dec	106,408
From 2012	
Total lbs	1,036,050
Total Tons	518.0
Total M/Ton	470.93

67.5 ton (61.4MT) went to landfill
450.5 Ton (409.5 MT) class A

1st Qtr		
	Total lbs	85,753
	Total Tons	42.9
	Total M/Ton	39.0
2nd Qtr		
	Total lbs	353,711
	Total Tons	176.9
	Total M/Ton	160.8
3rd Qtr		
	Total lbs	301,012
	Total Tons	150.5
	Total M/Ton	136.8
4th Qtr		
	Total lbs	295,574
	Total Tons	147.8
	Total M/Ton	134.4

Dates bio-solids applied to:

Site 1 (City Corporation)

Total amount applied:
Total acres = 47.4
Total tons/acres
Total M/Ton/acre

Site 2 (Baker land)

Total amount applied: 0 lbs
Total acres = 56.7
total ton/acres
total M/Ton/Acre

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received 4/9/15

220 North Knoxville Russellville, Arkansas 72801
Phone (479) 968-6767 Fax (479) 968-1956
www.eegonline.com

City Corporation
Post Office Box 3186
Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 188888-1
Sample Identification: L246-049555 0315152 Field #1 24-Mar-2015 1345

Analyte		Result	RL	Units	Qualifier
Electrical Conductivity Mod. EPA 9050A	Prep: 31-Mar-2015 0930 by 93	**82** Analyzed: 31-Mar-2015 1500 by 93	2	**umho/cm** Batch: W51406	
Cation-Exchange Capacity Mod. EPA 9080		**8.3** Analyzed: 01-Apr-2015 0857 by 308	0.2	**meq/100g** Batch: W51416	
Total Solids SM 2540 G 1997	Prep: 27-Mar-2015 1444 by 271	**68** Analyzed: 30-Mar-2015 1041 by 271	0.01	**wt %** Batch: W51378	
Calcium EPA 3051A, 6010C	Prep: 30-Mar-2015 1030 by 315	**9400** Analyzed: 02-Apr-2015 1149 by 302	10	**mg/Kg** Batch: S38584	
Magnesium EPA 3051A, 6010C	Prep: 30-Mar-2015 1030 by 315	**1800** Analyzed: 02-Apr-2015 1149 by 302	3	**mg/Kg** Batch: S38584	
Phosphorus EPA 3051A, 6010C	Prep: 30-Mar-2015 1030 by 315	**8700** Analyzed: 02-Apr-2015 1149 by 302	10	**mg/Kg** Batch: S38584	
Potassium EPA 3051A, 6010C	Prep: 30-Mar-2015 1030 by 315	**550** Analyzed: 02-Apr-2015 1149 by 302	100	**mg/Kg** Batch: S38584	
Sodium EPA 3051A, 6010C	Prep: 30-Mar-2015 1030 by 315	**130** Analyzed: 02-Apr-2015 1149 by 302	100	**mg/Kg** Batch: S38584	
Sodium Absorption Ratio EPA 3051A, 6010C		**0.32** Analyzed: 30-Mar-2015 1030 by 302		Batch: S38584	
Nitrate as N EPA 9056A	Prep: 26-Mar-2015 1647 by 07	**9.1** Analyzed: 26-Mar-2015 1850 by 07	0.8	**mg/Kg** Batch: C17566	

DIVISION OF AGRICULTURE
RESEARCH & EXTENSION
University of Arkansas System

Cooperative Extension Service
Soil Testing And Research Laboratory
Marianna, AR 72360
http://soiltest.uaex.edu

RANDY BRADLEY/CITY CORP	Client ID: 4799685797
404 JIMMY LILE RD	
RUSSELLVILLE	AR 72801
Date Processed:	4/10/2015
Field ID:	1
Acres:	43
Lime Applied in the last 4 years:	Yes
Leveled in past 4 years:	No
Irrigation:	Unknown
County:	Pope
Lab Number:	54849
Sample Number:	3461182

1. Nutrient Availability Index

Nutrient	Concentration		Soil Test Level (Mehlich 3)
	ppm	lb/acre	
P	751	1502	Above Optimum
K	82	164	Low
Ca	1882	3764	--
Mg	163	326	--
SO4-S	60	120	--
Zn	76.3	152.6	--
Fe	272	544	--
Mn	100	200	--
Cu	18	36	--
B	0.4	0.8	--
NO3-N			--

2. Soil Properties

Property	Value	Units
Soil pH (1:2 soil-water)	5.4	--
Soil EC (1:2 soil-water)		umhos/cm
Soil Estimated CEC	17.07	cmolc/kg
Organic Matter (Loss on Ignition)		%
Estimated Soil Texture	Silty Clay Loam - Clay Loam	

Estimated Base Saturation (%)				
Total	Ca	Mg	K	Na
64.85	55.13	7.96	1.23	0.53

3. Recommendations

(Notice: State and/or federal nutrient management regulations may supersede these agronomic recommendations.)

Crop		N	P2O5	K2O	SO4-S	Zn	B	Lime
Last Crop	Pasture (212)	lb/acre						
Crop 1	Mixed Cool and Warm-Season Grasses for Pasture (212)	60	0	100	0	0	0	6000
Crop 2								
Crop 3								

4. Crop 1 Notes:

To favor cool-season grasses, apply N in late winter. To favor warm-season grasses, do not apply N until May 1. For higher production, topdress 50 lb N/Acre after every 4-6 weeks of grazing or as needed.

5. Crop 2 Notes:

6. Crop 3 Notes:

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received 4/13/15

1st Qtr
Bio Solids

City Corporation
Post Office Box 3186
Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 188958-1
Sample Identification: L246-049564 0315167 PCW Bio-Solids 25-Mar-2015 1400

Analyte		Result	RL	Units	Qualifier
Total Solids SM 2540 G 1997	Prep: 02-Apr-2015 1535 by 271	**14** Analyzed: 03-Apr-2015 1658 by 271	0.01	**wt %** Batch: W51439	
Volatile Solids SM 2540 G 1997	Prep: 02-Apr-2015 1658 by 271	**76** Analyzed: 03-Apr-2015 1658 by 271	0.01	**wt %** Batch: W51439	
Ammonia as N SM 4500-NH3 B,G 1997	Prep: 30-Mar-2015 1520 by 93	**3100** Analyzed: 31-Mar-2015 2002 by 93	400	**mg/Kg** Batch: W51393	
Total Kjeldahl Nitrogen SM 4500-Norg D 1997	Prep: 30-Mar-2015 1649 by 308	**58000** Analyzed: 01-Apr-2015 1219 by 308	20000	**mg/Kg** Batch: W51397	
Arsenic EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**5.9** Analyzed: 02-Apr-2015 1209 by 302	5	**mg/Kg** Batch: S38584	
Cadmium EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**1.3** Analyzed: 02-Apr-2015 1209 by 302	0.4	**mg/Kg** Batch: S38584	
Calcium EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**7600** Analyzed: 02-Apr-2015 1209 by 302	10	**mg/Kg** Batch: S38584	
Copper EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**250** Analyzed: 02-Apr-2015 1209 by 302	0.6	**mg/Kg** Batch: S38584	
Lead EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**52** Analyzed: 02-Apr-2015 1209 by 302	4	**mg/Kg** Batch: S38584	
Magnesium EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**3000** Analyzed: 02-Apr-2015 1209 by 302	3	**mg/Kg** Batch: S38584	
Molybdenum EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**12** Analyzed: 02-Apr-2015 1209 by 302	0.8	**mg/Kg** Batch: S38584	
Nickel EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**35** Analyzed: 02-Apr-2015 1209 by 302	1	**mg/Kg** Batch: S38584	
Phosphorus EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**23000** Analyzed: 02-Apr-2015 1202 by 302	100	**mg/Kg** Batch: S38584	
Potassium EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**4700** Analyzed: 02-Apr-2015 1209 by 302	100	**mg/Kg** Batch: S38584	
Selenium EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**< 7** Analyzed: 02-Apr-2015 1209 by 302	7	**mg/Kg** Batch: S38584	
Sodium EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**910** Analyzed: 02-Apr-2015 1209 by 302	100	**mg/Kg** Batch: S38584	
Sodium Absorption Ratio EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**2.2** Analyzed: 02-Apr-2015 1209 by 302		Batch: S38584	
Zinc EPA 3051A, 6010C	Prep: 30-Mar-2015 1031 by 315	**900** Analyzed: 02-Apr-2015 1209 by 302	0.2	**mg/Kg** Batch: S38584	

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Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 188958-1 (Continued)
Sample Identification: L246-049564 0315167 PCW Bio-Solids 25-Mar-2015 1400

Analyte		Result	RL	Units	Qualifier
Mercury		**0.92**	0.1	**mg/Kg**	
EPA 7471B	Prep: 31-Mar-2015 1202 by 313	Analyzed: 31-Mar-2015 1409 by 302		Batch: S38601	
Nitrate as N		**< 4**	4	**mg/Kg**	H
EPA 9056A	Prep: 27-Mar-2015 1643 by 07	Analyzed: 27-Mar-2015 2215 by 07		Batch: C17570	
Nitrite as N		**< 4**	4	**mg/Kg**	H
EPA 9056A	Prep: 27-Mar-2015 1643 by 07	Analyzed: 27-Mar-2015 2215 by 07		Batch: C17570	
Polychlorinated Biphenyls (PCBs) By EPA 3550C, 8082A					
PCB 1016		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
PCB 1221		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
PCB 1232		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
PCB 1242		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
PCB 1248		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
PCB 1254		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
PCB 1260		**< 0.095**	0.095	**mg/Kg**	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	
Surrogate: Decachlorobiphenyl (32.6-141%)		82.0		%	
EPA 3550C, 8082A	Prep: 31-Mar-2015 1618 by 285	Analyzed: 02-Apr-2015 1110 by 306		Batch: G10072	

City Corporation Pretreatment Program

Record of pH

pH Method: SM 18th 4500-H + B Electronic Method

Facility Name: Bio-solids First Quarter

Date / Time Sample Collected: 3/25/15 @ 2-1400 Collected by: CJ

Date / Time Sample Analyzed: 3/25/15 @ 1410 Analyzed by: CJ

pH value sample: 7.05 Temp: 21.1C

pH value duplicate: — Abs. Diff. (sample duplicate): —

pH meter # H-160

pH meters used are calibrated each morning - record of calibration on file in the PCW lab.

CITY CORPORATION
RUSSELLVILLE WATER & SEWER

P. 479-968-2105
F. 479-968-3265
"Award Winning Water"

July 13, 2017

Arkansas Department of Environmental Quality
Water Division, No-Discharge Section
5301 Northshore Dr.
North Little Rock, Arkansas 72118

RE: Permit No. 5126-W, AFIN 58-00105,

To whom it may concern:

This letter shall serve as City Corporation's Annual Biosolids Report for 2016 as required by permit listed above permit. During this reporting year City Corporation did not land apply any biosolids produced at our facility. City Corporation produced 848.61 dry metric ton of biosolids in 2016, all of which were Class A EG. The required soil and waste analyses are enclosed.

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

Sincerely,

Steve Mallett
Chief Executive Officer

cc: Larry Collins
Randy Bradley
File

205 W. 3rd Place
PO Box 3186
Russellville, AR 72811
citycorporation.com

2016 Bio Solids Production

	Lbs (Dry weight)
Jan	108,454
Feb	155,051
Mar	240,668
Apr	187,719
May	256,855
Jun	145,827
Jul	129,540
Aug	112,631
Sep	136,089
Oct	169,656
Nov	178,269
Dec	46,191
Total lbs	1,866,950
Total Tons	933.5
Total M/Ton	848.61

1st Qtr		
	Total lbs	504,173
	Total Tons	252.1
	Total M/Ton	229.2
2nd Qtr		
	Total lbs	590,401
	Total Tons	295.2
	Total M/Ton	268.4
3rd Qtr		
	Total lbs	378,260
	Total Tons	189.1
	Total M/Ton	171.9
4th Qtr		
	Total lbs	394,116
	Total Tons	197.1
	Total M/Ton	179.1

Dates bio-solids applied to:

Site 1 (City Corporation)

Total amount applied:
Total acres = 47.4
Total tons/acres
Total M/Ton/acre

Site 2 (Baker land)

Total amount applied: 0 lbs
Total acres = 56.7
total ton/acres
total M/Ton/Acre

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received 6/6/16

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City Corporation
Post Office Box 3186
Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 202242-1
Sample Identification: L246-051144 0516132 Field #2 13-May-2016 1303

Analyte		Result	RL	Units	Qualifier
Electrical Conductivity (1:1 ratio)		**280**	3	**umho/cm**	
Mod. EPA 9050A	Prep: 19-May-2016 1356 by 308	Analyzed: 19-May-2016 1515 by 308		Batch: W55982	
Cation-Exchange Capacity		**42**	0.2	**meq/100g**	
Mod. EPA 9080		Analyzed: 19-May-2016 0756 by 308		Batch: W55971	
Total Solids		**68**	0.01	**wt %**	
SM 2540 G 1997	Prep: 18-May-2016 1343 by 100	Analyzed: 19-May-2016 1032 by 100		Batch: W55961	
Arsenic		**5.1**	5	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Calcium		**8500**	10	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Copper		**130**	0.6	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Lead		**39**	4	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Magnesium		**2500**	3	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Molybdenum		**6.7**	0.8	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Nickel		**20**	1	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Phosphorus		**6400**	10	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Potassium		**910**	100	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Selenium		**< 7**	7	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Sodium		**110**	100	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Sodium Absorption Ratio		**0.27**			
EPA 3051A, 6010C		Analyzed: 19-May-2016 0924 by 317		Batch: S41159	
Zinc		**220**	0.2	**mg/Kg**	
EPA 3051A, 6010C	Prep: 19-May-2016 0923 by 313	Analyzed: 20-May-2016 1159 by 317		Batch: S41159	
Mercury		**1.4**	0.1	**mg/Kg**	
EPA 7471B	Prep: 20-May-2016 1044 by 313	Analyzed: 27-May-2016 1702 by 313		Batch: S41167	
Nitrate as N		**9.2**	0.8	**mg/Kg**	H
EPA 9056A	Prep: 17-May-2016 1517 by 07	Analyzed: 17-May-2016 1755 by 07		Batch: C18833	

DIVISION OF AGRICULTURE
RESEARCH & EXTENSION
University of Arkansas System

Cooperative Extension Service
Soil Testing And Research Laboratory
Marianna, AR 72360
http://soiltest.uark.edu

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RANDY BRADLEY CITY CORPS 404 JIMMY LILE RD		Client ID:	4799685747
RUSSELLVILLE		AR	72801
Date Processed:	5/24/2016		
Field ID:	NA		
Acres:	10		
Lime Applied in the last 4 years:	Yes		
Leveled in past 4 years:	No		
Irrigation:	Unknown		
County:	Pope		
Lab Number:	70110		
Sample Number:	3464119		

1. Nutrient Availability Index

Nutrient	Concentration		Soil Test Level (Mehlich 3)
	ppm	lb/acre	
P	723	1446	Above Optimum
K	85	170	Low
Ca	3935	7870	--
Mg	196	392	--
SO4-S	63	126	--
Zn	89.3	178.6	--
Fe	245	490	--
Mn	67	134	--
Cu	25.4	50.8	--
B	1.1	2.2	--
NO3-N			--

2. Soil Properties

Property	Value	Units
Soil pH (1:2 soil-water)	5.9	--
Soil EC (1:2 soil-water)		umhos/cm
Soil Estimated CEC	25.60	cmolc/kg
Organic Matter (Loss on Ignition)		%
Estimated Soil Texture	Clay	

Estimated Base Saturation (%)				
Total	Ca	Mg	K	Na
84.38	76.84	6.38	0.85	0.31

3. Recommendations

(Notice: State and/or federal nutrient management regulations may supersede these agronomic recommendations.)

Crop		N	P2O5	K2O	SO4-S	Zn	B	Lime
Last Crop	Hay (142)	---------- lb/acre ----------						
Crop 1	Mixed Cool and Warm Season Grasses 2 ton (142)	80	0	150	0	0	0	0
Crop 2								
Crop 3								

4. Crop 1 Notes:

To favor cool-season grasses, apply fertilizer in late winter. To favor warm-season grasses, do not apply N until May 1.

5. Crop 2 Notes:

6. Crop 3 Notes:

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Enterprise Group, Inc.

220 North Knoxville Russellville, Arkansas 72801
Phone (479) 968-6767 Fax (479) 968-1956
www.eegonline.com

2nd Qtr 2016
5.0 Solids

received
Monday 5-2-16 gg

City Corporation
Post Office Box 3186
Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 201292-1
Sample Identification: L246-051020 0416111 PCW Bio-Solids 13-Apr-2016 1345

Analyte		Result	RL	Units	Qualifier
TCLP: Solids EPA 1311		**100** Analyzed: 18-Apr-2016 1559 by 100	0.5	% Batch: S40995	
TCLP: Arsenic EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**< 0.3** Analyzed: 20-Apr-2016 1342 by 317	0.3	mg/l Batch: S41004	D Dil: 5
TCLP: Barium EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**0.35** Analyzed: 20-Apr-2016 1342 by 317	0.01	mg/l Batch: S41004	D Dil: 5
TCLP: Cadmium EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**0.022** Analyzed: 20-Apr-2016 1342 by 317	0.02	mg/l Batch: S41004	D Dil: 5
TCLP: Chromium EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**0.045** Analyzed: 20-Apr-2016 1342 by 317	0.04	mg/l Batch: S41004	D Dil: 5
TCLP: Lead EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**< 0.2** Analyzed: 20-Apr-2016 1342 by 317	0.2	mg/l Batch: S41004	D Dil: 5
TCLP: Selenium EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**< 0.4** Analyzed: 20-Apr-2016 1342 by 317	0.4	mg/l Batch: S41004	D Dil: 5
TCLP: Silver EPA 3010A, 6010C	Prep: 20-Apr-2016 1002 by 317	**< 0.04** Analyzed: 20-Apr-2016 1342 by 317	0.04	mg/l Batch: S41004	D Dil: 5
TCLP: Mercury EPA 7470A	Prep: 20-Apr-2016 0807 by 313	**< 0.008** Analyzed: 21-Apr-2016 1121 by 313	0.008	mg/l Batch: S41002	D Dil: 40
Total Solids SM 2540 G 1997	Prep: 18-Apr-2016 1041 by 100	**28** Analyzed: 19-Apr-2016 0921 by 100	0.01	wt % Batch: W55621	
Volatile Solids SM 2540 G 1997	Prep: 18-Apr-2016 1041 by 100	**22** Analyzed: 19-Apr-2016 0921 by 100	0.01	wt % Batch: W55621	
Ammonia as N SM 4500-NH3 B,G 1997	Prep: 18-Apr-2016 0953 by 319	**1600** Analyzed: 18-Apr-2016 1320 by 319	200	mg/Kg Batch: W55619	
Total Kjeldahl Nitrogen SM 4500-Norg D 1997	Prep: 15-Apr-2016 1324 by 319	**23000** Analyzed: 18-Apr-2016 1526 by 319	2000	mg/Kg Batch: W55609	
Arsenic EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	**< 5** Analyzed: 21-Apr-2016 1743 by 317	5	mg/Kg Batch: S41013	
Cadmium EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	**< 0.4** Analyzed: 21-Apr-2016 1743 by 317	0.4	mg/Kg Batch: S41013	
Calcium EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	**270000** Analyzed: 22-Apr-2016 1132 by 317	1000	mg/Kg Batch: S41013	
Copper EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	**71** Analyzed: 21-Apr-2016 1743 by 317	0.6	mg/Kg Batch: S41013	
Lead EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	**4.6** Analyzed: 21-Apr-2016 1743 by 317	4	mg/Kg Batch: S41013	

EEG
Environmental
Enterprise Group, Inc.

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Post Office Box 3186
Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 201292-1 (Continued)
Sample Identification: L246-051020 0416111 PCW Bio-Solids 13-Apr-2016 1345

Analyte		Result	RL	Units	Qualifier
Magnesium		**3500**	3	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Molybdenum		**3.7**	0.8	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Nickel		**9.4**	1	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Phosphorus		**7300**	10	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Potassium		**1700**	100	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Selenium		**< 7**	7	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Sodium		**340**	100	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Sodium Absorption Ratio		**0.18**			
EPA 3051A, 6010C		Analyzed: 21-Apr-2016 1419 by 317		Batch: S41013	
Zinc		**160**	0.2	**mg/Kg**	
EPA 3051A, 6010C	Prep: 21-Apr-2016 1419 by 313	Analyzed: 21-Apr-2016 1743 by 317		Batch: S41013	
Mercury		**0.50**	0.1	**mg/Kg**	
EPA 7471B	Prep: 18-Apr-2016 1408 by 313	Analyzed: 19-Apr-2016 1248 by 313		Batch: S40994	
Density at 23 deg.C		**4.03**	0		
ASTM D854-83		Analyzed: 18-Apr-2016 1207 by 93		Batch: C18737	
Nitrate as N		**31**	2	**mg/Kg**	
EPA 9056A	Prep: 15-Apr-2016 1325 by 07	Analyzed: 16-Apr-2016 0256 by 07		Batch: C18732	
Nitrite as N		**3.6**	2	**mg/Kg**	
EPA 9056A	Prep: 15-Apr-2016 1325 by 07	Analyzed: 16-Apr-2016 0256 by 07		Batch: C18732	
Polychlorinated Biphenyls (PCBs) By EPA 3550C, 8082A					
PCB 1016		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	
PCB 1221		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	
PCB 1232		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	
PCB 1242		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	
PCB 1248		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	

EEG
Environmental
Enterprise Group, Inc.

220 North Knoxville Russellville, Arkansas 72801
Phone (479) 968-6767 Fax (479) 968-1956
www.eegonline.com

City Corporation
Post Office Box 3186
Russellville, AR 72811-3186

ANALYTICAL RESULTS

AIC No. 201292-1 (Continued)
Sample Identification: L246-051020 0416111 PCW Bio-Solids 13-Apr-2016 1345

Analyte		Result	RL	Units	Qualifier
Polychlorinated Biphenyls (PCBs) By EPA 3550C, 8082A (Continued)					
PCB 1254		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	
PCB 1260		**< 0.047**	0.047	**mg/Kg**	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	
Surrogate: Decachlorobiphenyl (50.3-164%)		87.2		%	
EPA 3550C, 8082A	Prep: 20-Apr-2016 1601 by 306	Analyzed: 22-Apr-2016 1824 by 306		Batch: G10476	

City Corporation Pretreatment Program

Record of pH

pH Method: SM 18th 4500-H + B Electronic Method

Facility Name: Second Quarter Sludge

Date / Time Sample Collected: 4/13/16 @ 1345 Collected by: AJ

Date / Time Sample Analyzed: 4/13/16 @ 1350 Analyzed by: TS

pH value sample: 12.02 Temp: 34.1

pH value duplicate: 12.00 Abs. Diff. (sample duplicate): 0.02

pH meter # H-160

pH meters used are calibrated each morning - record of calibration on file in the PCW lab.

ADEQ

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

July 25, 2017

Steve Mallett, Chief Executive Officer
City Corporation
P.O. Box 3186
Russellville, AR 72811

RE: Russellville City Corporation - Response to Inspections (Pope Co)
AFIN: 58-00105 Permit No.: AR0021768
AR0021768C3
5126-W

Dear Mr. Mallett:

I have reviewed the response pertaining to my June 8 and 9, 2017 inspections of the City Corp's wastewater permits. The information provided sufficiently addresses the violations referenced in my inspection reports. At this time, the Department has no further comment concerning these particular inspections. 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 ext. 15 or you may e-mail me at beck@adeq.state.ar.us.

Sincerely,

Amy Beck

Amy Beck
District 5 Field Inspector
Office of Water Quality