

August 21, 2023

Richard Healey,
Enforcement Branch Manager
Division of Environmental Quality
Office of Water Quality
Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118

RE: City of Fort Smith Massard Water Reclamation Facility CAP Request
Permit # AR0021750; AFIN 66-01652

Dear Mr. Healey;

Since May 2023 the City of Fort Smith Massard Water Reclamation Facility (WRF) has been experiencing challenges meeting the ammonia nitrogen limits as outlined in the current NPDES permit. The City is formally requesting to be allowed to voluntarily draft and submit a Corrective Action Plan (CAP) to bring the Massard WRF back into compliance.

In May 2023, the Fort Smith Massard WRF experienced three (3) 7-day average violations, a monthly average violation, and a monthly loading violation.

In June 2023, the Fort Smith Massard WRF experienced three (3) 7-day average violations, and a monthly average violation, and a monthly loading violation for ammonia nitrogen effluent limit.

In July 2023, the Fort Smith Massard WRF experienced one (1) 7-day average violations, and a monthly average violation, and a monthly loading violation for ammonia nitrogen effluent limit.

Currently, the Fort Smith Massard WRF will not meet the monthly average limit for the August 2023 reporting period for ammonia nitrogen effluent limit.

From May 2023 to current, staff have tried the following solutions to bring the Massard WRF back into compliance.

1. Purchased and added nitrifying microbial seed.
2. Utilized outside consultant to review microbial and aeration processes.
3. Sent samples to a contract laboratory to ensure Fort Smith lab results were correct.
4. Based on the external lab reports and recommendations, purchased and added a different nitrifying microbial seed to the treatment process.
5. Utilized additional blowers to add more oxygen to the aeration basins.

6. Removed older sludge from secondary clarifiers (reduce sludge blanket).
7. Added alkalinity and increased pH to aid in nitrification.
8. Utilized a second laboratory that specializes in identifying characteristics that would impede proper nitrification.
9. Reseeded the Massard WRF aeration basin with known healthy biosolids from another WRF.
10. Purchased and added additional microbial seed to the treatment process.
11. Exploring the option of implementing TBLLs in the Pretreatment Permits issued to Industrial Discharge Users.

Through these actions, we have achieved ammonia reductions sufficient to return to compliance with the permitted ammonia nitrogen 7-day average effluent limitation for six (6) weeks. We expect to be in full compliance with the 7-day average for ammonia nitrogen for the August 2023 monitoring period. However, Fort Smith recognizes the continued noncompliance of the monthly average requirement. In the past when Fort Smith experienced compliance issues for ammonia at the Massard WRF, the compliance issues were short lived and were corrected by performing the actions listed above.

Fort Smith is committed to compliance with the Clean Water Act and its NPDES permit requirements.

To prepare for the CAP, Fort Smith is working to secure a professional services agreement with Garver to provide professional engineering services. As Garver is very familiar with the Massard WRF and has extensive experience with treatment issues, the City is asking that DEQ allow Garver time to evaluate the situation and provide a solution to bring the Massard WRF into compliance.

Fort Smith respectfully requests a ninety (90) days to provide a written CAP to DEQ. The CAP will include the findings as to the possible or actual root cause of the ammonia exceedances, the possible solutions to address the cause, and a time frame to implement the solution and return to compliance. As additional violations are likely to accrue during the period in which the CAP is under development and during implementation of the solution, the City respectfully requests a consent administrative order with suspended penalty to address the exceedances of the permitted ammonia limits and incorporate the voluntary CAP.

Fort Smith welcomes any help and feedback that DEQ is willing to offer. If you have any questions or need additional information, please do not hesitate to contact us. We look forward to hearing back in regards to our request for a voluntarily CAP and consent administrative order.

Sincerely,



Lance McAvoy
Water Utilities Director