



CITY CORPORATION

Russellville Water and Sewer System

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November 4, 2015

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 the noncompliance report (NCR) for October 2015 as required by NPDES permit AR0021768.

During this reporting period City Corporation experienced permit violations for the following parameters:

1. Total Residual Chlorine (TRC) – Inst. Max.
2. Copper, Total Recoverable – Monthly Avg. Conc.
3. Copper, Total Recoverable – 7-Day Avg.

The above violations were caused by the following events at the Pollution Control Works during this reporting period.

1. The TRC violation was caused by operators using the wrong reagents when checking chlorine levels in the contact basins. Operators check the chlorine level in the contact basins twice a shift using a small Hach handheld unit. When replacing the reagents used with this meter, they were given Free chlorine packet when they should have used the Total chlorine packet. Chlorine adjustment was made based on the readings and the chlorine was increased without increasing the sulfur dioxide feed, causing the violation. All Free chlorine reagents have been removed and staff instructed to always check to ensure proper reagent when checking chlorine levels.
2. Staff is not sure what caused the copper violation. The first copper sample collect during this reporting period showed a copper concentration of 46 ug/L. Lab staff collected 6

additional copper samples for the month and all results were below 6.9 ug/L. Wastewater Operations Manager feels that this initial sample was an abnormal occurrence due to never having a copper sample anywhere near the 46 ug/L reported by the lab. Staff will continue to monitor the copper levels in the effluent as well as the influent to the plant in efforts to detect increased loading.

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
File