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September 8, 2016

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 is submitted as an overview of the operation issues with ammonia nitrogen we have experienced at the wastewater treatment plant during the past 12 months.

The issues began in early September 2015 when the plant experienced some type of toxin that inhibited the plant's ability to oxidize ammonia. This episode occurred the first week of the month and duration was limited to the one week. The plant was effective in its ability to treat the ammonia nitrogen loading for the next 3 months but in early January 2016 the plant experienced another event that inhibited the oxidation of ammonia nitrogen, unlike the previous episode the plant was unable to quickly recover. Some of the factors that prevented a recovery were increased flows caused by the winter wet weather, low temperatures and lower than desirable pH levels in the aeration basins. This period of non-compliance lasted for the next 4 months until late May 2016 when the plant regained its ability to effectively oxidize the ammonia nitrogen loading.

During this period of troubles City Corporation used the services of an environmental scientist and an operations engineering to review all operational processes and data to assist in trying to find the cause of the inhibition. Both parties came to the same conclusion that some type of toxin is being received in quantities to inhibit the nitrifying bacteria. City Corporation pretreatment department has been reviewing all industrial sampling data, slug control plans, and doing testing for toxins at different locations to try and determine the type and source of the toxin.

City Corporation is committed to finding and eliminating the source of pollutant that is causing the upsets at our treatment plant. As we progress City Corporation will continue to keep ADEQ updated with any new findings. Should you need other information please contact me at (479) 968-2080.

Sincerely,



Steve Mallett
Chief Executive Officer

cc: Larry Collins
Randy Bradley
File