

Comment: The City Corporation Russellville is currently operating under CAO LIS 09-146 as amended by CAO LIS 09-146-001. Compliance with the effluent limits for TSS and Nitrates is scheduled to be achieved by 01/10/16. Collection System improvements is to be completed by 03/31/2022. The facility maintains that construction at the treatment plant is preventing the plant from functioning properly. This condition is further aggravated by heavy Rainfall.

ENFORCEMENT COMPLIANCE REVIEW

NPDES Permit No. AR0021768

City Corporation Russellville

1. DMR data indicate that the facility has had the following effluent violations in the past 3 years (the list of violations and dates are attached for review):

Total for 3 years: 209

How many for each year

Year 1: 18

Year 2: 57

Year 3: 134

- 40 effluent violations for BOD
- 53 effluent violations for TSS
- 43 effluent violations for Nitrogen Ammonia
- 10 effluent violations for DO
- 21 effluent violations for Fecal Coliform
- 12 effluent violations for Total Residual Chlorine
- N/A effluent violations for Total Phosphorus
- 0 effluent violations for Nitrate
- 1 effluent violations for Total Recoverable Zinc
- 19 effluent violations for Total Recoverable Copper
- 9 effluent violations for Total Recoverable Mercury
- 0 effluent violations for pH
- N/A effluent violations for Oil & Grease
- 0 violations for DMR Non Receipt

XX total violations

2. The facility has submitted Non-Compliance Reports.

Yes

3. Was explanation of Non-Compliance acceptable?
Yes
4. Did they correct the problem?
No- The facility is operating under a CAO

Did they have the same violation for #3 above over and over?
Yes
5. Did we take any action to resolve the above violations?

No- Enforcement action has already been taken.
6. What Action we are taking to resolve the above violations.
Enforcement action has already been taken.
7. How many violations for DMR non-receipts we have?
0
8. Number of reported SSOs. 128
9. How many SSO greater than 1,000 gallons? 79
10. The facility had a CAO issued on 11/06/09 for effluent violations and Sanitary Sewer Overflows and was later amended on 06/02/14.
- 11.
12. The CAO/NOV/DAO is: still open.
13. The facility has met the compliance schedule with the order.
14. A non-compliance letter(s) were sent to the facility regarding effluent violations/DMR non-receipts/Deficient DMR/Fees. No letters sent.
15. What corrective actions were taken for item above, are they compliance now? N/A
16. The facility has met the compliance schedule with the permit for the following reports- Mercury compliance reported 10/18/13.
17. Permit fees are current.

18. Based on information above are you able to solve compliance issue prior to issuance of the permit?

No

19. Other helpful information