



# CITY CORPORATION

Russellville Water and Sewer System

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March 10, 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 February 2015 as required by NPDES permit AR0021768.

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

1. Oxygen, Dissolver – Inst. Min.
2. Total Suspended Solids (TSS) – Monthly Avg. Mass (lbs/day)
3. Total Suspended Solids (TSS) – Monthly Avg. Concentration
4. Total Suspended Solids (TSS) – 7-day Avg.
5. Nitrogen, Ammonia – Monthly Avg. Mass (Lbs/day)
6. Nitrogen, Ammonia – Monthly Avg. Concentration
7. Nitrogen, Ammonia – 7-day Avg.
8. Zinc, Total Recoverable – Monthly Avg. Mass (Lbs/day)
9. Zinc, Total Recoverable – Monthly Avg. Concentration
10. Zinc, Total Recoverable – 7-day Avg.
11. Copper, Total Recoverable – Monthly Avg. Mass (lbs/day)
12. Copper, Total Recoverable – Monthly Avg. Concentration
13. Copper, Total Recoverable – 7-day Avg.
14. Mercury, Total Recoverable – Monthly Avg. Mass (Lbs/day)
15. Mercury, Total Recoverable – Monthly Avg. Concentration
16. Mercury, Total Recoverable – 7-day Avg.
17. Fecal Coliform Bacteria – 30 Day Avg.
18. Fecal Coliform Bacteria – 7-day Avg.
19. CBOD5 – Monthly Avg. Mass (lb/day)

20. CBOD5 – Monthly Avg. Concentration

21. CBOD5 – 7 Day Avg.

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

1. The listed violations are a direct result of problems associated with increased sludge production from the ongoing plant expansion. The increase in sludge was much more than anticipated based on previous sludge production and has exceeded the capacity of our sludge press. The inability to properly waste and dispose of the increased sludge volumes has led to the build-up of sludge blankets in all primary/secondary/contact basins beyond normal operation parameters. Also during the month of February, we have experienced increased flow from precipitation and below freezing temperatures, which has had a negative impact on our microbiological life and treatment processes. The combination of all the issues cited herein is directly reflected in the violations listed.
2. To address these issues, we are quickly moving forward with efforts to increase our sludge handling capabilities and expect to have a new 3 meter belt press on site and operational during the week of March 16<sup>th</sup>. We have recently received approval from your agency to further process our sludge through a lime stabilization process with the goal of achieving Class A sludge. With the combination of these two pieces of equipment, we expect to have the excess sludge removed from the basins and re-establish healthy microbiological activity. We are working to have a permanent sludge handling solution in place by the deadline of January 10, 2016 as cited in the current Consent Administrative Order. We feel confident that the new expansion and increased sludge handling capabilities will prevent future violations.

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