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***"Award Winning Water"***

February 9, 2017

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 January 2017 as required by NPDES permit AR0021768.

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

1. Ammonia Nitrogen (NH<sub>3</sub>-N) – Monthly Avg. Mass, lbs/day
2. Ammonia Nitrogen (NH<sub>3</sub>-N) – Monthly Avg. Concentration
3. Ammonia Nitrogen (NH<sub>3</sub>-N) – 7-day Avg.
4. Solids, Total Suspended (TSS) – Monthly Avg. Concentration
5. Solids, Total Suspended (TSS) – 7-day Avg.

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

1. As in recent years, with a drop in the temperatures, the plant sludge in our aeration basins has become very fluffy and we have experienced a loss of the nitrification bacteria. The fluffy sludge carries over very easily and during an increase to plant flow due a storm event, the TSS violation occurred. We have reviewed all operational data and have determined a source of increased BOD loading to the plant. We are currently in contact with this industry in efforts to reduce the impact to the POTW. This industry is a food processing facility that uses quaternary ammonium compounds for their sanitation. These chemicals may also be some of the issues with the loss of nitrification bacteria that causes the ammonia violation. We continue to research the possible factors contributing to the violation and will keep ADEQ apprised of our findings.

Should you have any questions or need other info please contact Larry Collins, Chief Operations Officer at 479-968-2080 ext. 222.

Sincerely,

  
Steve Mallett  
Chief Executive Officer

cc: Larry Collins  
Randy Bradley  
File

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