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"Award Winning Water"

June 16, 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 May 2017 as required by NPDES permit AR0021768.

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

1. Oxygen, Dissolved (DO) – Inst. Min.
2. Ammonia Nitrogen (NH₃-N) – Monthly Avg. Mass, lbs/day
3. Ammonia Nitrogen (NH₃-N) – Monthly Avg. Concentration
4. Ammonia Nitrogen (NH₃-N) – 7-day Avg.
5. Solids, Total Suspended (TSS) – Monthly Avg. Concentration
6. Solids, Total Suspended (TSS) – 7-day Avg.
7. Solids, Total Suspended (TSS) – Monthly Avg. Mass, lbs/day
8. Copper, Total Recoverable – Monthly Avg. Mass, lbs/day
9. Mercury, Total Recoverable – Monthly Avg. Mass. Lbs/day
10. Mercury, Total Recoverable – Monthly Avg. Concentration
11. Mercury, Total Recoverable – 7-day Avg.
12. Fecal Coliform Bacteria (FCB) – 7-day Geo Avg.
13. Carbonaceous Biochemical Oxygen Demand (CBOD) – Monthly Avg. Mass, lbs/day
14. Carbonaceous Biochemical Oxygen Demand (CBOD) – Monthly Avg. Concentration
15. Carbonaceous Biochemical Oxygen Demand (CBOD) – 7-day Avg.

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

1. During this reporting period the plant continues to experience very light and fluffy sludge in the aeration complex. All the violations are a direct result of loss of solids in the effluent due to carry over from the

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final clarifiers. Operators continue to monitor and attempt to maintain the correct SRT, DO, pH, RAS and WAS in efforts to product quality effluent. City Corporation is currently executing a contract with an engineering firm to do a complete study and model of the treatment plant to determine the corrective actions needed. It is our intent to identify a solution to correct these violations and develop plans for needed improvements within the next twelve months. We are expecting to issue bonds in the Summer of 2018 and will have to re-prioritize these and other available funds as necessary to construct these improvements. Furthermore, staff has met with our most significant contributor to our BOD loading to discuss implementing practices and procedures related to cleaning and disinfecting that could provide short term reduction in their BOD contribution. Staff also discussed possible long term solutions with regard to upgrades/expansions at their location and/or our wastewater treatment plant. Our Pretreatment department continues to work with local industries in efforts to lower the BOD loading in general.

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