



ARKANSAS
Department of Environmental Quality

February 15, 2012

Craig Noble, Wastewater Superintendent
City Corporation
Russellville Water and Sewer
P.O. Box 3186
Russellville, AR 72811

RE: NPDES Permit No. AR0021768, AFIN 58-00105, 2nd denial of compliance date extension for TSS and TRC

Dear Mr. Noble:

Thank you for attending the February 1, 2012 meeting concerning the revised Corrective Action Plan submitted by City Corporation on January 13, 2012. The Department certainly appreciates City Corporation's cooperative efforts toward protecting the water environment.

As you know, the Department's main area of concern was the request by City Corporation to extend the date for compliance with the permitted limits for Total Suspended Solids (TSS) and Total Residual Chlorine (TRC) until January 10, 2016. After much discussion, the department reiterated the decision not to extend the deadline for the TSS and TRC.

On August 4, 2011, CWB Engineers submitted a letter on behalf of City Corporation informing the Department that pilot testing indicated that the disc filters would not be reliable in ensuring compliance with the permitted limits for TSS. In an August 16, 2011 response, the Department stated that there was no objection to City Corporation's evaluation of other technologies for the purpose of controlling TSS, but the final compliance date for both TSS and TRC would not be extended. A copy of the letter has been included for your convenience.

Furthermore, the original Corrective Action Plan submitted by City Corporation included a milestone schedule which established June 3, 2010 as the date by which pilot testing of the disc filters would be complete. Additionally, the schedule stated that "in the event that the pilot test proves to be ineffective, City Corporation will research other treatment technologies and submit to ADEQ for a revision of this schedule". However, Paragraphs 15 and 16 of the Order and Agreement Section of CAO LIS 09-146 provides for the granting of extensions of compliance dates so long as the request is made prior to the due date specified in the Permittee's Milestone Schedule. A revised Milestone Schedule which included the installation of alternative technologies for the removal of TSS and an extension of the compliance due to the failure of the disc filters date should have been submitted prior to June 3, 2010.

In Summary, the Department would like to advise City Corporation of the following:

- Compliance with the Interim Limits established in Paragraph 10 of the Order and Agreement Section of CAO LIS 09-146 must be achieved and maintained.
- Compliance with the permitted effluent limits for TSS and TRC shall be achieved no later than July 31, 2012.
- Compliance with the permitted effluent limits for Nitrate shall be achieved no later than January 10, 2016.
- In the event that a bypass of the treatment facility becomes necessary, City Corporation shall comply with Part III, Section B., Paragraph 4 of NPDES Permit No. AR0021768.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

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Thank you for your attention to this matter. Should you have any questions concerning this or any other compliance issue, please do not hesitate to contact me at 501-682-0635, or you may e-mail me at anderson@adeq.state.ar.us.

Sincerely,



Alan Anderson
Enforcement Analyst
Enforcement Branch
Water Division

ADEQ

ARKANSAS
Department of Environmental Quality

August 16, 2011

Craig Noble, General Manager
City Corporation
P.O. Box 3186
Russellville, AR 72811-3186

RE: TSS Compliance Progress
Comprehensive Corrective Action Plan
NPDES Permit No. AR0021768; AFIN: 58-00105; CAO LIS No. 09-146

Dear Mr. Noble:

The Department has reviewed a letter from Clint Bell, P.E. dated August 4, 2011 concerning the original plan to install disc filters for reduction of TSS in the effluent. This letter states that the data compiled during the pilot testing of the filters concluded that the filters lack performance to consistently meet the permit limits for TSS, and that City Corporation is evaluating other alternatives to achieve compliance with TSS limits. It was also stated that through operational modifications, the facility has remained in compliance with TSS limitations. According to the letter, City Corporation is working with CDM to evaluate additional TSS treatment options and that CDM is currently compiling a preliminary engineering report on the possible treatment options to ultimately achieve TSS compliance.

The Department has no objection to City Corporation evaluating other treatment options for TSS control. However, please be advised that the final compliance date of July 31, 2012 for both TSS and TRC compliance will not be extended. Any additional TSS control equipment and the planned sulfur dioxide dechlorination system will require a construction permit from the Department prior to installation.

On a final note, the Department would like to remind you that the first report addressing the progress towards attaining the final effluent limits for Mercury is to be submitted by October 1, 2011 in accordance with the NPDES permit. Please feel free to contact Shane Byrum at (501) 682-0618 or Alan Anderson at (501) 682-0635 with any questions you may have.

Sincerely,



Mo Shafii
Assistant Chief, Water Division

cc: Alan Anderson, Enforcement Administrator
Shane Byrum, Permit Engineer