



CITY CORPORATION

Russellville Water and Sewer System

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June 8, 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 May 2015 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. 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. Chlorine, total residual – Inst. Max
6. CBOD5 – Monthly Avg. Mass (lb/day)
7. CBOD5 – Monthly Avg. Concentration
8. CBOD5 – 7 Day Avg.

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

1. All the above violations are a direct result of excessive rain events during the month of May. The excessive rain increased flows above 14 MGD that caused hydraulic overload to the aeration basins and final clarifiers that resulted in loss of solids. These events were contained to four (4) days and the plant was able to recover and is within permit limits at this time. In July, we will receive proceeds from issuance of revenue bonds that will allow us to continue and increase our efforts to address the excess stormwater entering

the wastewater collection system. In addition to the over \$13 million we have spent on the treatment facilities to address the items cited in the CAO, we have spent over \$4 million in the last couple years addressing the collection system and will be receiving \$20 million to continue the efforts in the collection system over the next three years. Our rates include the likelihood of issuing up to an additional 20 million of revenue bonds in 2018 if needed to complete the efforts to repair the collection system with full expectation that these efforts will bring us into compliance and provide relief to the wastewater plant during wet weather events.

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