

APR 27 2012



4:29pm.

Transmittal

To: Alan Anderso

From: Craig Noble

ADEQ

Date: April 27, 2012

5301 Northshore Dr
North Little Rock AR 72118

Re: Final Progress Report ON O&M Evaluation Program

Job #: NPDES Permit NO AR0021768

Via: *Mail:* *Overnight:* X *Courier:* X

Enclosed please find:

For your use	X
For your review	
For your signature	

Approved	
Approved as noted	
Returned to you for correction	

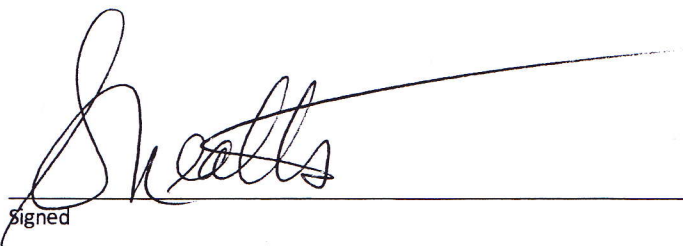
Message:

Please find enclosed (1) Copy of Final Progress Report on Operations Modifications Evaluation Program and Meeting Minutes from February 1, 2012; (1) Copy CAO LIS No 09-146 Generator Quick Connects status letter.

Please contact me with any questions.

Thank you,

Craig Noble
General Manager
City Corporation
Russellville Water and Sewer System
205 West 3rd Place Russellville AR 72811-3186
479-968-2105


signed



CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 966-2105
FAX (479) 966-3265

April 27, 2012

Mr. Alan Anderson
Enforcement Administrator
NPDES Enforcement Section
Arkansas Department of Environmental Quality
5301 Northshore Dr
North Little Rock, Arkansas 72118

RE: FINAL progress report on "Operations Modifications Evaluation Program"
NPDES Permit No. AR0021768
CAO LIS No. 09-146
AFIN 58-00105

Dear Mr. Anderson:

In accordance with the above referenced Consent Administrative Order executed November 6, 2009, and the Corrective Action Plan dated May 28, 2010, City Corporation is submitting the final progress report to provide information pursuant to modifications for nitrate removal at City Corporation's Pollution Control Works (PCW). The initial "Operations Modifications Evaluation Program" was submitted to ADEQ on August 31, 2010.

Outlined below is a summary of activities which occurred from the previous quarterly progress report dated, January 13, 2012.

1. March 23, 2012: 60% plan review for modification and upgrades to address Total Residual Chlorine (TRC) compliance – Schedule I Improvements.
2. March 23, 2012: 30% plan review for modifications and upgrades to comply with Nitrates (NO₃-N), Totals Suspended Solids (TSS), carbonaceous biochemical oxygen demand (CBOD₅), dissolved oxygen (DO), and fecal coliform bacteria (FCB) – Schedule II improvements.
3. April 26, 2011: 90% plan review for modification and upgrades to address Total Residual Chlorine (TRC) compliance – Schedule I Improvements.
4. April 26, 2011: 60% plan review for modifications and upgrades to comply with Nitrates (NO₃-N), Totals Suspended Solids (TSS), carbonaceous biochemical oxygen demand (CBOD₅), dissolved oxygen (DO), and fecal coliform bacteria (FCB) – Schedule II improvements.

To date, operational modifications have been optimized with the existing treatment process. No further operational modifications are anticipated prior to the construction of improvements for compliance. As such, no further quarterly progress reports for Nitrate removal will be provided as capital improvements are necessary for compliance and this will be the Final Report that was originally indicated on December 31, 2012, of the Corrective Action Plan (CAP). As indicated in the CAP dated May 28, 2010, and previously advised to ADEQ on January 13, 2012, City Corporation has entered into an agreement dated December 30, 2011, with CDM Smith to design the improvements necessary for compliance.

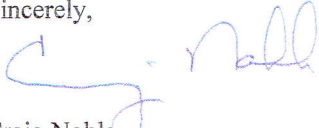
Outlined below is an approximate milestone schedule for the submission of plans and specifications for upgrades and modifications necessary for compliance.

Milestone Activity	Date
Submission of Plans and Specifications to ADEQ for construction permit review and approval for Schedule I improvements	May 11, 2012
ADEQ review and approval period completion for Schedule I improvements	July 31, 2012 (estimated)
Award Schedule I improvements	September 28, 2012
Submission of Plans and Specifications to ADEQ for a construction permit review and approval for Schedule II improvements	August 10, 2012
ADEQ review and approval period completion for Schedule I improvements	November 9, 2012 (estimated)
Award Schedule II improvements	February 28, 2013
Complete construction Schedule I improvements	March 29, 2013
Complete construction Schedule II improvements	February 28, 2015

Further, City Corporation is in receipt of your letter dated February 15, 2012, advising your denial to approve a modification to the Comprehensive Corrective Action Plan extending the compliance date for Total Suspended Solids (TSS) and Total Residual Chlorine (TRC) until January 10, 2016, which was requested in our correspondence to ADEQ dated January 13, 2012. With all due respect, City Corporation does not concur with your conclusion and position; however, City Corporation will diligently endeavor to satisfy the requirements of the Consent Administrative Order and approved Corrective Action Plan dated May 28, 2010. For your records, we have transmitted herewith a copy of the Meeting Record of our joint meeting on February 1, 2012.

If you have any questions concerning this Quarterly Progress Report, please call Larry Collins at 479.968.2080, extension 132.

Sincerely,



Craig Noble
General Manager

cc: Larry Collins
Randy Bradley
Clint Bell
Craig Johnson
File



1. The meeting was held at the ADEQ offices, on Wednesday, February 1, 2012 with the following parties present:

<u>Name</u>	<u>Organization</u>	<u>Title</u>
Craig Uyeda	ADEQ	Branch Manager
Mo Shafii	ADEQ	Asst. Division Manager
Alan Anderson	ADEQ	Enforcement Analyst
Gary Bennett	Garver	Project Manager
Sam Sawyer	ADEQ	Enforcement Coordinator
Randy Bradley	City Corporation	Pretreatment Coordinator
Craig Noble	City Corporation	General Manager
Larry Collins	City Corporation	Operations Manager
Ricky Biffle	City Corporation	Wastewater Superintendent
Clint Bell	CWB Engineers	President
Craig Johnson	CDM	Client Manager
Kyle Breckenridge	BEC, PLLC	Project Manager

2. A revised Corrective Action Plan (CAP) was submitted to ADEQ on January 13, 2012 (CAP Revision 4). The purpose of the meeting was to discuss comments and concerns from ADEQ.
3. Alan Anderson could not support the request to extend the deadline for TSS and TRC.
4. Clint Bell advised ADEQ that the time extension was permissible under the CAP for TSS/TRC dated December 23, 2009, page 3, Section III- Implementation Schedule, as a result of inadequate pilot performance on the disc filters, and the time request was permissible per the CAO and CAP process. ** In the event that the pilot test proves the filters to be ineffective, owner will research other treatment technologies and submit to ADEQ for a revision in this schedule.
5. Mo Shafii advised City Corporation that they have been added to the EPA's 'Watch List' for NPDES non-compliance as a result of three consecutive NPDES non-compliance excursions.
6. Craig Noble provided a summary of progress from the previous meeting date with ADEQ on October 5, 2011, which was outlined in the quarterly progress report dated January 13, 2012.
7. City Corporation advised ADEQ that civil penalty would further delay the improvement process outlined for completing improvements for compliance.



8. Mo Shafii advised the attendees that modification to any permit limit or time extension in the proposed CAP Revision 4 was not likely, more specifically:
 - a. Limit for Nitrate, TSS, and TRC will not change
 - b. No time extension for compliance will be permitted
 - c. The NPDES Permit in 2015 will become effective for all parameters less those identified for interim limits in the CAO
9. The above items outlined in Item 7 are subject to the interpretation and final decision of the Director of ADEQ.
10. Mo Shafii advised City Corporation that any modification to the CAO or CAP's would require public comment process, even though previous submittals had not been subject to public comment.
11. Craig Johnson advised ADEQ that nitrate limits set forth by the CAO is arbitrary since the facility does not have any denitrification process for reliable treatment of nitrates. Technical demonstration of the nitrate removal capability is shown in the Preliminary Engineering Report submitted with the Quarterly Report dated January 13, 2012.
12. Craig Johnson advised ADEQ that the enforcement of the bypass provision during peak flow events will provide a lesser discharge water quality than when the facility bypasses. Further disabling bypass will further cause NPDES violations with CBOD5, TSS, and TRC.
13. ADEQ advised City Corporation that enabling bypass in accordance with Section 4 – Bypass of Treatment Facilities of the NPDES Permit is permissible.
14. ADEQ advised City Corporation that enabling bypass during construction should be outlined in the construction permit for improvements.
15. ADEQ advised City Corporation that the permit review period would be at a minimum 50 days from day of submission, but can take up to six month process. Mo Shafii committed to expediting the review process as much as possible since the CAO is in effect.
16. Adjournment at approximately 11:20am.