



# CITY CORPORATION

Russellville Water and Sewer System

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November 7, 2012

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 is to inform you of a Total Residual Chlorine (TRC) violation experienced at City Corporation's Pollution Control Facility on November 6, 2012. During the normal sampling by our laboratory staff the TRC sample measured 0.12 mg/L. This result is above the permit limit of <0.1 mg/L.

On October 18, 2012 City Corporation staff installed a temporary Sodium Bisulfite ( $\text{NaHSO}_3$ ) system to address the TRC issue during construction of our permanent Sulfur Dioxide system. This temporary system works well for the most part but is limited due to location where we have to feed the chemical and lack of proper mixing. Our staff has historically sampled for permit compliance at the final weir where the effluent flow meter is installed. The actual outfall is located some 300 yards from the weir and it is our intent to sample for TRC at the second junction box on the outfall line. By sampling at this location proper mixing for the  $\text{NaHSO}_3$  should occur. This sampling location is addressed in our construction permit application that was approved by ADEQ on September 20, 2012.

To ensure effectiveness of this plan our staff collected another TRC sample at 1300 hours from the normal location and this sample had a TRC concentration of <0.1 mg/l. The staff also collected a sample from the above proposed alternate location and this sample also had a TRC concentration of <0.1 mg/L. It is our belief that the cause of this violation is due to improper mixing and the steps taken as outlined above will allow for us to maintain compliance with TRC limits.

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

Sincerely,

Steve Mallett  
Utility Engineer/Chief Operating Officer

cc: Larry Collins  
Randy Bradley  
Ricky Biffle  
File