



June 18, 2012

## **CITY CORPORATION**

Russellville Water and Sewer System

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

Phone (479) 968-2105  
FAX (479) 968-3265

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 2012 as required by NPDES permit AR0021768.

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

1. Nitrate (N03-N), Monthly Average Concentration

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

1. May was a very warm and dry month; the increased water temperature along with abnormally low flows at the PCW contributed to the increased effluent nitrate. On advice of CDM Smith Engineers we have made operational changes in an effort to meet current nitrate limits. The changes are as follows:

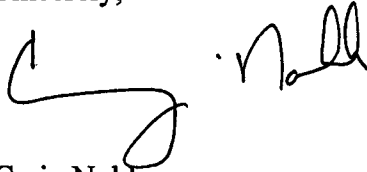
a. The north rock trickling filter has been taken off line in an effort to increase the BOD to the aeration basin. This increased BOD should allow for greater microorganism growth and allow for de-nitrification occur.

b. The injected air in the aeration basins are now being cycled to allow for 2 hours run (injection) time and 1 hour 15 minutes off. We are doing this to allow for anoxic conditions to occur which allows for de-nitrification.

These efforts have shown to reduce the nitrate levels dramatically and we continue to work closely with our engineering staff to make every effort to meet or exceed permit limits.

If you have any questions concerning this report, please contact Larry Collins at 479-968-2080, extension 132.

Sincerely,

A handwritten signature in black ink, appearing to read "Craig Noble". The signature is fluid and cursive, with the first name "Craig" written in a large, sweeping loop and the last name "Noble" written in a more compact, cursive style.

Craig Noble  
General Manager

cc: Larry Collins  
Randy Bradley  
Andrew Pownall  
Al Sun  
Craig Johnson  
Clint Bell  
File

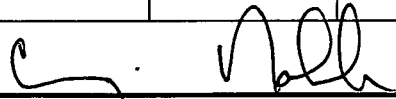
## Sanitary Sewer Overflow (SSO) Monthly Report

Facility Name: City Corporation NPDES Permit No.: AR0021768 Monitoring Period (Month/Year): 05/ 2012

No Sanitary Sewer Overflows This Monitoring Period

| Summary Report Code Descriptions |                   |                                                       |                            |                                 |
|----------------------------------|-------------------|-------------------------------------------------------|----------------------------|---------------------------------|
| Cause(s) of SSO                  |                   | SSO Impact                                            | Action(s) Taken            | Ultimate Discharge Location     |
| CO-Construction                  | D-Debris          | NEAH-No Evidence Adverse Health/ Environmental Impact |                            | CR-Creek/Stream/River (specify) |
| E-Equipment Failure              | G-Grease          | OEHC-Observed or Evidence of Human Contact            | EC-Environmental Cleanup   | DI-Ditch                        |
| HC-Hydro Clean                   | LF-Line Failure   | EFK-Evidence of Fish Kill                             | HC-Hydro Cleaned           | DR-Drop Inlet                   |
| R-Rainfall                       | RG-Roots / Grease |                                                       | HR-Hand Rodded             | GR-Ground Surface               |
| RO-Roots                         | V-Vandalism       |                                                       | EN-Referred to Engineering | PA-Paved Area                   |
|                                  |                   |                                                       | PN-Public Notification     | CB-Contained in Building        |

| Location | Manhole # | Start Date of SSO | End Date of SSO | Estimated Volume (in gallons) | Cause of SSO | Environmental Impact | Action (s) Taken to Address SSO | Discharge Location |
|----------|-----------|-------------------|-----------------|-------------------------------|--------------|----------------------|---------------------------------|--------------------|
|          |           |                   |                 |                               |              |                      |                                 |                    |
|          |           |                   |                 |                               |              |                      |                                 |                    |
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|          |           |                   |                 |                               |              |                      |                                 |                    |
|          |           |                   |                 |                               |              |                      |                                 |                    |
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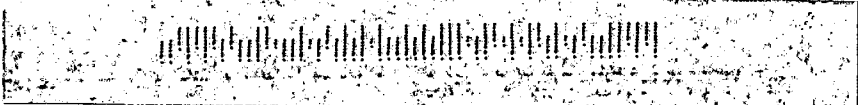

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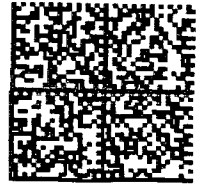
Signature of Cognizant or Ranking Official Date

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

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From  
**CITY CORPORATION**

Russellville Water & Sewer System  
P.O. Box 3186 Russellville, AR 72811

To: Alan Anderson  
ADEQ  
5301 Northshore Dr.  
North Little Rock, AR 72118