

C6854

# Marion Water Department

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WATER UTILITIES MANAGER  
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August 18, 2011



Arkansas Department of Environmental Quality  
NPDES Enforcement Section  
5301 Northshore Drive  
North Little Rock, Arkansas 72118-5317

RE: Consent Administrative Order  
Permit #0021971

In response to the captioned letter, we will attempt to give an account of what the City of Marion has implemented in an effort to meet the ADEQ permit requirements.

Since last year, when our permit parameters were lowered, we have had difficulty meeting compliance on several parameters. We began to take corrective measures to meet these permit limits.

Fisher and Arnold Engineering was brought in to do a study to see what things could be done to upgrade the City of Marion's wastewater lagoons to attain compliance. The study that Fisher and Arnold provided will give us long-term solutions that we will be pursuing.

In February, 2011, we hired a Consultant to help us meet compliance with our existing system while we determine what long-term solutions will best suit the City of Marion.

One of the first things recommended was to buy a Sulfonator system to dechlorinate our effluent. This immediately brought our Chlorine Residual permit parameter into compliance. We have maintained that compliance on Chlorine Residual.

We also focused our attention on the Ammonia compliance issues that we have had. We first tested leach-ate waste that we were receiving from Santek Environmental. We found that this was a major contributor to our lagoon ammonia. We immediately stopped the dumping of the leach-ate into our system.

We began inoculating the system with proven ammonia-reducing bacteria and have seen our effluent ammonia levels reduced from 30mg/l to below the permit limits of 2.4mg/l. But, we have not been able to maintain below permit levels.

We purchased an (EPA approved method) Ammonia Meter and have been able to run ammonia tests throughout the system on site. We have found that before entering our rock beds, the ammonia levels are well below permit limits but at the effluent, the levels are above permit limits. We had previously thought the rock beds were causing problems; now we are certain that the rock beds are problematic. We are taking short-term steps to clean these beds to help meet compliance as soon as possible. We are also looking at long-term solutions for cleaning these beds or an alternative treatment in place of the beds.

We are planning to study the lagoon sludge depths to determine whether we need to clean out the lagoons. We are also exploring adding extra aeration to the lagoons. We anticipate this will give extra oxygen to the system during extremely hot weather and will help with ammonia levels.

The City of Marion has diligently made efforts in the last year to attain complete compliance of all permit parameters. In the last year, the number of excursions on our Monthly DMR's has dropped tremendously. We feel the corrective measures that we have in place, along with our future plans for the system, will help ensure that the City of Marion is able to meet all of the Permit Parameters of our Discharge permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Frank A. Fogleman / gh". The signature is written in a cursive style with a large initial "F" and a trailing "gh".

Frank A. Fogleman  
Mayor

FAF/gh