

ADEQ

ARKANSAS
Department of Environmental Quality

February 25, 2014

Honorable Frank Fogleman
City of Marion
P.O. Box 717
Marion, AR 72364

RE: NPDES Permit No. AR0021971, AFIN 18-00110
Effluent Violations

Dear Mayor Fogleman:

The Department has conducted a file review of the above referenced permit and determined your facility has experienced thirty-six (36) effluent violations from April 1, 2013 through January 31, 2014. Of those violations, twelve (12) were Total Suspended Solids, fifteen (15) were Nitrogen, Ammonia, five (5) were Fecal Coliform and four (4) were Biochemical Oxygen Demand (BOD).

Attached is a list of effluent violations that have occurred for your review. Paragraph 1 of the Order and Agreement of CAO LIS # 12-035 required the City of Marion to submit a Corrective Action Plan (CAP) which ADEQ approved on September 5, 2012. However, effluent violations for BOD were not included in CAO LIS # 12-035 and subsequent CAP. Please submit a plan/report detailing the corrective actions that you are taking or will take to achieve compliance with the terms of the above mentioned permit for BOD. The plan/report shall be received no later than **March 10, 2014**.

Failure to remain in compliance with the effluent limitations set forth in your permit violates Part I, Section A of your permit and may result in enforcement action that will include the assessment of a civil penalty.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0636 or you may e-mail me at porterg@adeq.state.ar.us.

Sincerely,



Gina Porter
Enforcement Analyst
Water Division Enforcement Branch

DMR Effluent Violations Since 4/1/13

AR0021971 - MARION, CITY OF / Major POTW - Effective: 7/1/12

DMR End Date	Discharge Number	Parameter Description	Reported DMR Value	Permit Limit	Vio %
04/30/2013	001-A	Solids, total suspended (MO AVG, lb/d)	452	267	69%
04/30/2013	001-A	Solids, total suspended (MO AVG, mg/L)	32	20	60%
04/30/2013	001-A	Solids, total suspended (7 DA AVG, mg/L)	53	30	77%
04/30/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	8.8	2.4	267%
04/30/2013	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	12.7	5.9	115%
05/31/2013	001-A	Solids, total suspended (MO AVG, lb/d)	461.66	267	73%
05/31/2013	001-A	Solids, total suspended (MO AVG, mg/L)	21.5	20	8%
05/31/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	32.82	32	3%
05/31/2013	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	557	400	39%
06/30/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	33.75	32	5%
06/30/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	2.61	2.4	9%
07/31/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	43.4	32	36%
07/31/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	4.28	2.4	78%
07/31/2013	001-A	Coliform, fecal general (30DA GEO, #/100mL)	238.46	200	19%
07/31/2013	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	783	400	96%
08/31/2013	001-A	Solids, total suspended (7 DA AVG, mg/L)	31	30	3%
08/31/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	84	32	163%
08/31/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	7.75	2.4	223%
08/31/2013	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	10	5.9	69%
08/31/2013	001-A	Coliform, fecal general (30DA GEO, #/100mL)	288	200	44%
08/31/2013	001-A	Coliform, fecal general (7 DA GEO, #/100mL)	414	400	4%
09/30/2013	001-A	Solids, total suspended (MO AVG, lb/d)	439	267	64%
09/30/2013	001-A	Solids, total suspended (MO AVG, mg/L)	37	20	85%
09/30/2013	001-A	Solids, total suspended (7 DA AVG, mg/L)	69	30	130%

09/30/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	48	32	50%
09/30/2013	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	4.14	2.4	73%
09/30/2013	001-A	Nitrogen, ammonia total [as N] (7 DA AVG, mg/L)	8.23	5.9	39%
09/30/2013	001-A	BOD, carbonaceous, 05 day, 20 C (MO AVG, mg/L)	37	15	147%
11/30/2013	001-A	BOD, carbonaceous, 05 day, 20 C (MO AVG, lb/d)	5228	200	2,514%
01/31/2014	001-A	Solids, total suspended (MO AVG, lb/d)	507.07	267	90%
01/31/2014	001-A	Solids, total suspended (MO AVG, mg/L)	30.92	20	55%
01/31/2014	001-A	Solids, total suspended (7 DA AVG, mg/L)	34	30	13%
01/31/2014	001-A	Nitrogen, ammonia total [as N] (MO AVG, lb/d)	143	90	59%
01/31/2014	001-A	Nitrogen, ammonia total [as N] (MO AVG, mg/L)	8.61	6.7	29%
01/31/2014	001-A	BOD, carbonaceous, 05 day, 20 C (MO AVG, lb/d)	287.17	200	44%
01/31/2014	001-A	BOD, carbonaceous, 05 day, 20 C (MO AVG, mg/L)	17.33	15	16%