

BOND CONSULTING ENGINEERS EAST, INC.
3683 STATE HIGHWAY 77 NORTH
MARION, ARKANSAS 72364

PHONE: (870)739-2228

FAX: (870)739-8407

E-mail: bondengineering@hotmail.com

C.H. BOND, JR., P.E.
JEROME B. ALFORD, P.E.
JACK G. BOND, P.E.

July 24, 2017

Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Attn: Bailey Taylor – Enforcement Analyst

RE: City of Marion
NPDES Permit No. AR0021971
AFIN 18-00110

Dear Bailey,

This letter is in response to your certified mail dated July 6, 2017.

The violations in Marion's discharge are from three episodes, one in May of 2016, one in June of 2016 and again in May of 2017. Our treatment process is waste stabilization ponds. Historically ponds of this type in the spring usually have permit violations in the form of Suspended Solids due to a healthy growth of algae. What is unusual about these current violations in Marion's discharge is the fact that we exceeded our limits in BOD.

Our research has found extreme rainfall episodes in the spring of 2016 and 2017. The only thing that makes any sense is these samples were collected during the time that we would suspect a pond turn over. Cold rain water on top would find its way toward the bottom bringing up a concentration of BOD from the anaerobic zone normally found at the bottom. With our detention time and the fact that the ponds are not close to being overloaded there aren't many circumstances that would point toward some corrective action.

Please note that Marion has not had a violation since May. The Utility Personnel, beginning immediately, will be more sensitive to the conditions discussed above and exercise the option of not discharging during similar future circumstances. This seems to be the most logical corrective action to be taken.

Sincerely,


Jerome Alford, P.E.


Mayor Frank Fogleman

Taylor, Bailey

Subject: FW: AR0021971 City of Marion

From: Bond Engineering [mailto:bondengineering@hotmail.com]

Sent: Tuesday, July 25, 2017 7:54 AM

To: Taylor, Bailey

Cc: Jim Shempert

Subject: Re: AR0021971 City of Marion

Good Morning Bailey,

Obviously City Personnel do not have the capacity to run a five day BOD. They can check DO. They have 50 acres of pond which provides 16 million gallons per foot of pond depth for storage. The advantage of pumping discharge to the Mississippi River does provide the storage capacity to hold the waste. Our suggestion was to NOT discharge during those rain events that would be suspect to cause pond turn over. Generally infiltration inflow volumes lag behind the actual rainfall event. These should make reasonable circumstances for them to hold discharges temporarily.

Jerome Alford, P.E.

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Marion, AR

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870-739-8407 FAX

From: Taylor, Bailey <taylor@adeq.state.ar.us>

Sent: Monday, July 24, 2017 4:10 PM

To: Bond Engineering

Subject: RE: AR0021971 City of Marion

Mr. Alford,

I have received the letter dated July 24, 2017. In the last paragraph you state that, in the future, the operators will not discharge during similar circumstances. Do they have the proper instruments to test the pond BOD or DO concentrations to determine whether they should discharge or not? Also, do they have the capacity to hold waste in the event they are not able to discharge?

Thanks,

Bailey Taylor

Enforcement Analyst

Office of Water Quality

Arkansas Department of Environmental Quality

501-682-0639

From: Bond Engineering [mailto:bondengineering@hotmail.com]

Sent: Monday, July 24, 2017 3:11 PM

To: Taylor, Bailey

Subject: Fw: Send data from MFP11648075 [Email To_Bond] 07/24/2017 15:09

Bailey,

Please acknowledge receipt of this email.

Brad Stevens

Bond Consulting Engineers East, Inc.

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Marion, AR

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