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January 31, 2024

Mr. Richard Healey
Enforcement Branch
5301 Northshore Drive
North Little Rock AR 72118

RE: Phone Call Follow Up AFIN: 04-00052, NPDES Permit No.: AR0022292

Dear Mr. Healey,

This letter is a follow up to our phone conversation last week concerning issues we have at the Decatur Wastewater plant due to the extreme cold conditions, we have had over the past few weeks. When I talked to you last week, problems caused by this cold event, looked like they could have been a lot worse than they are looking today, even though we are still struggling with capacity issues caused by the prolonged cold. We are not out of the woods yet on the amount of water we can process. But we are currently treating water within our permit limit.

So that you know what is going on, I will list some of the things we did to ensure we did to not discharge unpermitted wastewater. And some of the issues we are still dealing with.

During the freeze of 2020, we learned a lot from that, and took actions to prepare for the next big freeze. Major issues of 2020 for the most part was not the problem this time. We had some new problems that we will learn from this time. The part of this freeze that was different was in my opinion, from being there, was the length of the extreme cold. We did good for a few days but toward the end of the cold event, things started freezing.

I will list some of the problems we had which in the end led to us to not being able to filter to our normal effluent capacity, which is the last of the major issues we have left from the cold event.

Wasting lines to the sludge holding tank froze. Not being able to waste led to us renting a large pump and pumping MLSS to our old Bio-Lac treatment pond that had capacity to do this. We pumped approximately 2 million gallons to the pond. By doing this in my opinion and experience saved the plant from failure, due to high MLSS we could of began killing off our bacteria and caused high nutrient levels to be discharged, and this also increased our ability to filter discharge water. Other issues were freezing of the Screw Press auger to the loading truck. Loading truck fuel gelled for several days, even with treatment and block heaters. Airlines on truck and trailer froze. Hauler of sludge also had gelled fuel so even if we were able to process, we could not get the material loaded or off site.

Influent course screen auger froze, we had to remove course screen from the water, and let it pass to the fine screens. Our fine screens, we have two, and use two most of the time, did not freeze this time but the conveyors that carries screened material to the dumpster did freeze. We were able to separate auger from the screen, continue screening stored rags and solids on the deck around the screens to keep water moving through the screens, there is no bypass of the fine screens.

During this event, and still causing us problems is the sheer amount of water we have had to deal with. This was not caused by inflow and infiltration, but dripping faucets. We depend on the ability to be able to store water in our equalization pond during the week and pumping it out on the weekend, until our expansion. Because of the water usage from faucets dripping, flow into the plant increased during this time and we have not been able to bring our pond space back down to levels that help us during the week. So, we are pushing water back into our pond, and treating at capacity until then.

Going back to the high MLSS numbers we had that we resolved by pumping into an available pond. We believe this has sludged our filters that filter to the creek. We have had a manufacture rep onsite for four days helping us to resolve the reduced filtering capacity this has caused. This is our biggest single issue from the cold event that we have yet to resolve. This weekend we are going to try some enhanced cleaning methods that up until now, we have not been able to do because of the flow, or time to do these methods.

As I told you on the phone the other day, our UV disinfection units are down. Parts for them are ordered. But because we use membrane filtration, we are meeting permit for Fecal Coliform without the UV units running, but will have them back in operation as soon as parts arrive and we get them installed. We are using only when needed, the pond on the south side of our plant to hold water when we need to. We are using it very sparingly. But there have been a few times when our influent lift station has not been able to keep up, and this pond has prevented unpermitted discharges for us.

We want to ensure you we are doing all we can to get back to normal. We have a lot of ground and plant clean up to do when conditions are better. This has been a tough one for us. Worse thing that could happen to us is a lot of wet weather at this point. If you have any questions or concerns, please call me.

Respectfully,



James Boston
Public Works Manager
City of Decatur