

# Stuttgart Municipal Water Works

612 S College – PO Box 130 – Stuttgart Arkansas 72160  
Phone 870-673-3246 Fax 870-673-8783

**Tommy Lawson**  
**Manager**

October 28, 2015

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

ATTN: Mr. Alan Anderson, Enforcement Analyst  
Water Division, Enforcement Branch

RE: NPDES Permit No. AR0034380, AFIN 01-00214  
Stuttgart, Arkansas

Dear Mr. Anderson:

We are in receipt of your October 8, 2015 letter enclosing a Proposed Consent Administration Order for a reported 16 violations of discharge permit limits and proposing a civil penalty of \$5000.00 for those violations.

We point out, however, during the three year two month period approximately 2,970 parameter tests were performed on wastewater samples from our discharge stream. Therefore, there were approximately 2,954 parameter tests that met permit limit requirements.

There are a number of extenuating factors that probably contributed to the 16 failures, in our opinion. In the spring 2014 the Stuttgart area was overwhelmed with excessive rainfall events and flooding.

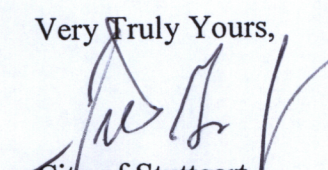
- a) For the (1) violation for Dissolved Oxygen, (7) violations of total Suspended Solids and (3) violations of Carbonaceous Biochemical Oxygen. In the fall of 2013 maintenance work and construction began to replace the mechanical bar screen unit and install a coarse screening compactor and build a grit removal system. Also, the aerator, gear drive and bridge on the East digester were replaced. Then the aerator and gear drive were replaced in the West digester. In order to perform the digester repair one digester had to be removed from service causing heavy loading to the operating digester and some back up of sludge in other unit processes. In June 2015, the tertiary filters were taken out service, the old media was removed and new media was installed and the filters put back in service in September 2015.

- b) The (4) violations of the Total Residual Chlorine limit were probably related to the latest change in permit limit of 0.1mg/l to Non-detectable Total Residual Chlorine limit.
- c) The (1) violation for Total Recoverable Copper may be undeterminable because copper is a natural occurring element and the limit is 29.5 parts per billion.

All of the above improvements and betterments were completed at huge costs and in an effort to support and improve wastewater treatment operations. Our wastewater system operating personnel work diligently every day to keep the entire system and treatment in compliance with permit guidelines. The Consent Administrative Order and Proposed Civil Penalty appear to be a kick in the backside rather than encouraging our operating personnel.

We ask that the Proposed Civil Penalty be reduced to a more equitable level of \$2500.00.

Very Truly Yours,



City of Stuttgart  
J.W. Green Jr., Mayor

