



December 7, 2011

Rufus J. Torrence,
NPDES Pretreatment Engineer
Arkansas Dept. of Environmental Quality
Water Division
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

Re: City of Fort Smith 2010 Annual Report
(Permit No. AR0021750, AFIN 66-00226)

Dear Mr. Torrence:

I am in receipt of your letter dated November 8, 2011 and received on November 16, 2011 regarding the Maximum Allowable Headworks Concentrations (MAHCs) and Water Quality Levels/Limits (WQLs) at our Massard Wastewater Treatment Plant (WWTP) as reported in our CY 2010/2011 annual Pretreatment Report.

In this letter, The Department required the City to find the source of the "slug loads" and control or abate metal loading from the source(s). This letter also requested response with a corrective action plan within thirty (30) days of receiving this letter.

As previously reported to you and Allen Gilliam, influent samples at this facility were historically contaminated by return activated sludge. The influent sample collection point is a distribution structure where return sludge was introduced at a point prior to our only available influent sample collection point. During the course of recent construction, this return sludge line was to have been either disconnected and/or relocated to a point that would not be commingle waste sludge with raw WWTP influent, thereby eliminating the possibility of sample contamination and providing us with an adequate sampling point.

After receipt of your letter, I interviewed plant operations personnel in order to determine why the elevated levels were experienced. Upon interviewing plant operations personnel, it was discovered that overflow from the sludge thickening processes could still potentially discharge sludge bearing wastes and could still contaminate influent samples. Also discussing this further with them, it was discovered that the sludge thickening processes regularly discharge sludge back to the plant headworks.

I believe WWTP influent sample contamination explains the sporadic elevated influent levels. As indicated by other data, levels are normally much lower than on those dates indicated. The Massard WWTP has an excellent effluent compliance record, additionally, Whole Effluent Toxicity (WET) analyses for the past year at the WWTP does not exhibit any latent toxic effects. Therefore, this indicates the elevated levels are not the result of "slug" discharges which could cause pass through or interference at the facility.

I have asked that plant operations staff find a way to fully eliminate sludge discharges to the headworks of the Massard WWTP. In the interim, sampling personnel will coordinate priority

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pollutant sampling at the WWTP on days it is known no sludge is being discharged to the headworks. This should eliminate any possibility of sample contamination from plant processes and will allow us to obtain an accurate measurement of WTP influent quality. This will in turn allow us to determine if there are any loading sources that could cause problems at the treatment facility.

If you have any questions, please don't hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'P. Easley', written over the word 'Sincerely,'.

Paul R. Easley
Environmental Manager
Fort Smith Utility

Pc: Steve Floyd, Superintendant of Operations