

From: [Greg Kremers](#)
To: [Jamie Belcourt \(adpce.ad\)](#)
Cc: [Steve Mallett](#); [Greg Kremers](#)
Subject: RE: City of Russellville AR0021768 Annual Pretreatment Program Report
Date: Tuesday, March 14, 2023 12:06:33 PM
Attachments: [image001.png](#)
[image002.png](#)
[Response to DEQ.pdf](#)

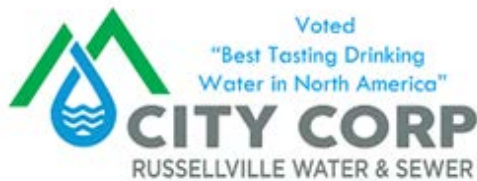
Ms. Belcourt,

Attached is City Corp's response to your request of February 28, 2023.

Thanks

Greg Kremers
Wastewater & Pretreatment Operations Director

City Corporation
Russellville Water & Sewer System
205 West Third Place
PO Box 3186
Russellville, AR 72811
Phone 479.968.2080 Ext. 236
Main 479.968.2105



From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Sent: Wednesday, March 1, 2023 2:28 PM
To: Greg Kremers <gkremers@citycorporation.com>
Subject: RE: City of Russellville AR0021768 Annual Pretreatment Program Report

Mr. Kremers,

That is satisfactory, thank you for the response.

Jamie Belcourt | State Pretreatment Coordinator
**Division of Environmental Quality | Office of Water Quality
Policy and Administration**
5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS

ENERGY & ENVIRONMENT

From: Greg Kremers [<mailto:gkremers@citycorporation.com>]
Sent: Wednesday, March 1, 2023 12:29 PM
To: Jamie Belcourt (adpce.ad)
Subject: RE: City of Russellville AR0021768 Annual Pretreatment Program Report

Ms. Belcourt,

I will get you a formal response within the next two weeks if that is satisfactory.

Thanks

Greg Kremers
Wastewater & Pretreatment Operations Director

City Corporation
Russellville Water & Sewer System
205 West Third Place
PO Box 3186
Russellville, AR 72811
Phone 479.968.2080 Ext. 236
Main 479.968.2105



From: Jamie Belcourt (adpce.ad) <jamie.belcourt@adeq.state.ar.us>
Sent: Tuesday, February 28, 2023 12:30 PM
To: Greg Kremers <gkremers@citycorporation.com>
Cc: Stacie Wassell (adpce.ad) <Stacie.Wassell@adeq.state.ar.us>; Richard Healey (adpce.ad) <Richard.Healey@adeq.state.ar.us>; David Ramsey (adpce.ad) <David.E.Ramsey@adeq.state.ar.us>
Subject: City of Russellville AR0021768 Annual Pretreatment Program Report

Mr. Kremers,

The City of Russellville's January 1, 2022 – December 30, 2022 Pretreatment Program Annual Report

(NPDES Permit AR0021768) was received, reviewed, and deemed complete and compliant according to the reporting requirements of 40 C.F.R. § 403.12(i).

However, during review of the submitted report, it was noted in the monitoring results of your submitted report that the maximum allowable headworks concentration (MAHC) for arsenic was exceeded for each quarter during the reporting year. Additionally, it was noted that the MAHC for zinc was exceeded for the first quarter of the reporting year. DEQ requests that the City of Russellville address the arsenic and zinc exceedances of the MAHC by investigating the cause of the high loading, identifying any noncomplying industries, and increasing monitoring of its industrial users. Please provide a response detailing the City's investigation into the cause, documentation of any industrial not in compliance, and results of additional monitoring conducted.

Further, it was noted during review of this report that the water quality level/limit is 5.8 µg/L for this permit and the detection level achieved using Standard Method (SM) 4500-CN C, E was 10 µg/L. Please ensure that the water quality level/limit is met in the future.

If you have any questions, please feel free to reach out to me.

Thank you,

Jamie Belcourt | State Pretreatment Coordinator
Division of Environmental Quality | Office of Water Quality
Policy and Administration

5301 Northshore Drive | North Little Rock, AR 72118
t: 501.682.0858 | c: 501.287.8714 | e: jamie.belcourt@adeq.state.ar.us



ARKANSAS
ENERGY & ENVIRONMENT

From: Greg Kremers [<mailto:gkremers@citycorporation.com>]
Sent: Friday, February 17, 2023 2:17 PM
To: Pretreatment-Submittals
Subject: City Corporation 2022 Pretreatment Report

To Whom it May Concern,

Attached is the 2022 Pretreatment Annual Report for City Corporation - Russellville Water & Sewer. Please confirm receipt.

Thanks

Greg Kremers

Wastewater & Pretreatment Operations Director

City Corporation

Russellville Water & Sewer System

205 West Third Place

PO Box 3186

Russellville, AR 72811

Phone 479.968.2080 Ext. 236

Main 479.968.2105





March 14, 2023

Jamie Belcourt, State Pretreatment Coordinator
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

Dear Ms. Belcourt,

City Corp – Russellville Water & Sewer (AR0021768) is in receipt of your email from February 28, 2023, regarding concerns for the exceedance of the maximum allowable headworks concentrations (MAHC) in each quarter for arsenic and the first quarter for zinc, during the 2022 reporting year. Additionally, it was noted that the water quality level/limit for cyanide is 5.8 μ /l, while the detection level of SM 4500-CN C,E 2011 was 10 μ /l, and to ensure that the water quality level/limit is met in the future. City Corp offers the following response:

The MAHC for arsenic (9.4 μ /l) is considerably lower than the water quality limit (349 μ /l) found in the latest Calculations of Arkansas Water Quality-Based Effluent Limitations spreadsheet. Let it be noted that all effluent samples for arsenic were below this water quality limit in 2022. However, City Corp will incorporate sampling for arsenic in conjunction with routine compliance monitoring, at each SIU to try and locate a source, as requested by your email. Additionally, City Corp met all monthly average, 7-day average, and loading limits for zinc in 2022. Routine compliance monitoring for zinc will continue for seven of the SIUs, along with the addition of zinc monitoring at the remaining eight industrial facilities. Once the additional monitoring has been completed later this year, City Corp will submit a Reporting of Findings to your office, no later than December 31, 2023.

Regarding the detection limit of SM 4500-CN C,E 2011 being higher than the water quality level/limit, City Corp contacted its contract lab, EEG, who in turn reached out to American Interplex and Pace Analytical. Neither lab was aware of a method for cyanide analysis that has a detection limit of 5 μ /l or less. The WQ level/limit (5.8 μ /l) was calculated from the Calculations of Arkansas Water Quality-Based Effluent Limitations spreadsheet. The most recent calculation by DEQ for our facility shows a minimum quantification level (MQL) of 10 μ /l for cyanide. Effluent analysis of cyanide in all four quarters produced results of < 10 μ /l. It is my understanding that one can only assume then, that any value below the detection limit is zero and in compliance with the WQ limit.

Thank you for the opportunity to respond to your concerns. Should you require any further information, please contact me at gkremers@citycorporation.com or 479-968-2080 ext. 236.

Respectfully,

A handwritten signature in black ink that reads "Greg Kremers". The signature is written in a cursive style with a large, looped initial "G".

Greg Kremers
Wastewater & Pretreatment Operations Director