

ADEQ

ARKANSAS
Department of Environmental Quality

May 10, 2012

Randy Bradley, Pretreatment Coordinator
City Corporation
Russellville Water and Sewer System
P.O. Box 3186
Russellville, Arkansas 72811-3186

Re: Russellville City Corporation Streamlining Update & TBL Development
(Permit No. AR0021768, AFIN 58-00105)

Dear Mr. Bradley:

In reference to Russellville City Corporation letter dated April 5, 2012, the Department has completed the review of the program update, local limit development document and supportive program documents. The Department will approve the update pending changes to the narrative.

In October 2005 EPA promulgated updates to 40CFR403 and concluded that thirteen (13) elements were more stringent than the previous pretreatment standards. Two of these elements, Best Management Practices (BMPs) and Slug Control Plans, are applicable to City Corporation's program. Therefore, City Corporation must update the program narrative to include these elements. This update may be section 7.0 BMP and section 8.0 Slug Control in the program narrative. The Department has provided the City with guidance.

As stated in the Department's letter dated February 10, 2012, the City used the same procedure for conventional pollutants (CBOD5, TSS & NH3-N) as the City used for conservative pollutants. This procedure is unacceptable for the development of local limits for conventional pollutants. As previously stated in the letter, local limit development is a dynamic and continuous process, and local limits appear unnecessary at this time for both toxic and conventional pollutants. Therefore, the Department will not require the City to make changes in the current local limit development, but the City must continue to evaluate the need for local limits. Please note that the City may continue to enforce the local limits in existing permits, but when these permits expire, the City must not include local limits in reissued permits.

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In accordance with **40CFR403.5(c)(1)**, City Corporation must continue to monitor conditions at the treatment plant. In accordance with **40CFR403.8(f)(4)** and in the future, City Corporation must develop applicable and current local limits or affirm from time to time (at least yearly in each annual report) that local limits are not necessary.

Please submit an updated Table of Contents and the additional page(s) with section 7 and 8 to the Department by June 15, 2012.

If you have any questions or concerns, please contact the Department at (501) 682-0626 or by email at torrence@adeq.state.ar.us .

Sincerely,

A handwritten signature in black ink that reads "Rufus Torrence". The signature is written in a cursive style with a large, sweeping initial "R".

Rufus Torrence,
ADEQ Engineer

Enclosures: Table of Contents w/note to add section 7 & 8

City Corporation – Industrial Pretreatment Program

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1.0 Introduction

2.0 Industrial Waste Survey

3.0 Legal Authority

4.0 Monitoring Program

5.0 Program Procedures

6.0 Program Organization, Cost and Revenue Sources

Appendix A – Sewer Use Ordinance

Appendix B – Pretreatment Ordinance

Appendix C – Local Limits Development Document

Appendix D – Enforcement Response Plan

Appendix E - Industrial Waste Survey and Permit Application

Appendix F – Significant Industrial Users

Appendix G – NPDES Permit

Appendix H – City Corporation Organization Chart

Appendix I – Industrial Pretreatment Contacts

Appendix J – Industrial Inspection Report Form

Appendix K – Chain-of-custody Sampling Record Form

Appendix L – Review Process For Industrial Monitoring Reports

Appendix M – User Fee and Rate Ordinance

Appendix N – Dover Sewer Use Agreement and Resolution

Appendix O – Legal Authority Review and Attorney’s Statement

7.0 Best Management Practices (BMPs)

8.0 Slug Control Evaluation

