



ARKANSAS
Department of Environmental Quality

April 20, 2011

Craig Noble, General Manager
City Corporation
Russellville Water and Sewer System
P O Box 3186
Russellville, Arkansas 72811-3186

Re: Russellville City Corporation TBLL Development
(Permit No. AR0021768, AFIN 58-00105)

Dear Mr. Noble:

In reference to City Corporation's current NPDES Permit # AR0021768 (i.e., effective October 1, 2010) under Part II.13.B, the City was required to submit by November 30, 2010 (i.e., 60 days from the effective date) a notification that a TBLL evaluation and a draft sewer use ordinance will be submitted within twelve months of the effective date. The Department understands that City Corporation commenced submitting the requirements prior to the issue of the new permit. On January 19, 2010, the City submitted the TBLL evaluation. On April 23, 2010 the City submitted the draft sewer use ordinance. The Department will accept these submittals as satisfying the requirement in the permit. However, the TBLL evaluation is incomplete.

In reference to City Corporation letter dated March 1, 2011, the Department has reviewed the City's Technically Based Local Limits (TBLL) Development. The development demonstrated that local limits for 40 CFR 122 Appendix D Table III pollutants are not necessary. However, the existing approved program development contains local limits for conventional pollutants {BOD5 and Ammonia (NH3)}.

City Corporation should submit an amendment to the TBLL document to update the local limits for the conventional pollutants. City Corporation is presently updating the pretreatment program to comply with the recent Streamlining revisions to 40 CFR 403. In accordance with §2.4.b in the proposed pretreatment ordinance, note that the amended TBLL document should be a separate document from the Streamlining program narrative document.

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In the last audit report, the Department recommended that City Corporation update these local limits for conventional pollutants which were approved by ADEQ on March 10, 1992. Local limit development is a dynamic and continuous process. EPA requires that each POTW with an approved pretreatment program must review its local limits at least every five years. City Corporation's last annual report indicated that three SIUs were placed in Significant Non-Compliance (SNC) with pretreatment standards. Two SIUs were in SNC for exceeding local limitations for conventional pollutants. City Corporation placed the third SIU in SNC for violating the 40 CFR 467.35 O&G limit. All O&G limits for categorical pretreatment standards are based on Total Petroleum Hydrocarbon (TPH). Therefore, the City should be certain to use EPA Method 1664A (SGT-HEM) to verify compliance.

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, appearing to read 'Rufus Torrence', is written over a horizontal line.

Rufus Torrence,
ADEQ Engineer