



City of Fort Smith

4-8-81
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April 2, 1981

Mr. Gerald Southall, Director
Department of Pollution Control
and Ecology
8001 National Drive
Little Rock, AR 72209

RE: City of Fort Smith, Arkansas

Dear Mr. Southall:


As you may remember, on March 16, 1981, the City of Fort Smith presented to your department an application for sewage sludge disposal at the site where we presently operate our solid waste disposal facility. Following the meeting at which this application was presented, the City received authorization to begin disposing of its sewage sludge as outlined in the engineering plan pending the permit being granted for this operation. This authorization is to remain in effect until a formal permit was approved or denied by the Commission on Pollution Control and Ecology. It is my understanding that this application will be submitted to the Commission for their consideration at a special Commission meeting scheduled for April 10, 1981. Although the City feels that the disposal methods outlined in the application are sound, there are factors which make this site extremely undesirable. As the Department of Health and Human Services for the United States has given the City a very positive indication that the General Services Administration will release the 200 surplus acres on Fort Chaffee to the City as early as May 1, 1981, we are beginning the necessary arrangements to close out our operations at our existing solid waste facility. Part of the closing out of these operations will necessitate the purchase of several thousand cubic yards of cover material. The sludge disposal site for which we have submitted our application is in an area where the soil mantle is very shallow and, therefore, the sludge disposal in this area is very land intensive. To continue sludge disposal at this site will seriously deplete the availability of cover material available to us without purchase. Additionally, the flash drying unit at our "P" Street Treatment Facility is in desperate need of repair. The parts to repair this unit have been ordered but the anticipated delivery date is still over two (2) months away. Since their order nearly two (2) months ago, we have had to have welders make emergency repairs in effort to keep this unit on line. If the flash drying unit were to fail to the extent that the worn parts could not be repaired by resources available to us locally, we would have no choice but to take the unit off line and then to haul the sludge generated by the "P" Street Treatment Facility to the sludge disposal site at the existing solid waste landfill. This would reduce the life expectancy of the sludge disposal site to a period of approximately two (2) weeks.

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The City's Board of Directors has entered into a contract with Mr. Lee Sawyer to allow him to haul and dispose of our sewage sludge if he can obtain a permitted site from the Commission on Pollution Control and Ecology on or before their regularly scheduled meeting in May, 1981. As you may remember, Mr. Sawyer has submitted and received approval for the pre-application which his engineers have submitted for a site south of Fort Smith referred to as Rye Hill. Mr. Sawyer's engineers feel that the final application for this site can be prepared and submitted to your department by April 10, or at the latest, April 15, 1981. Since the plans for this site will be submitted a month prior to the Commission's meeting scheduled in May, the City's flash drying unit reliability is questionable, and the sludge disposal site at our existing solid waste disposal facility will hinder our ability to close out our operations, I am requesting that you consider asking the Commission to grant the City of Fort Smith a special hearing for Mr. Sawyer's site once your department's staff has determined that the plans and narrative submitted with the permit application are acceptable. Mr. Sawyer will begin preparing his site in accordance with the permit application to be submitted, thus allowing him to begin disposing of our sewage sludge immediately after the contract has been signed with the City.

If this action can be taken by the Department of Pollution Control and Ecology it would end many undesirable conditions which exist for the City of Fort Smith and it would bring Fort Smith into full compliance with the Amended Administrative Order received February 20, 1981. Should you have any questions, please do not hesitate to contact myself or Mr. Steve Parke. Your consideration to this matter will be greatly appreciated.

Cordially,


Don Melton
Acting City Administrator

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