



**DIVISION OF
ENVIRONMENTAL
QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

April 2, 2025

Mr. Steve Mallett, Jr., CEO
City Corporation- Russellville Water and Sewer System Pollution Control Facility
PO Box 3186
Russellville, AR 72811
Email Address: smallett@citycorporation.com

RE: City Corporation Inspection (Pope County) – PDS# 133114, 133115, 133116
AFIN: 58-00105 Permit No.: AR0021768

Dear Mr. Mallett:

On March 6, 2025, I performed a Compliance Evaluation Inspection, Collection System Inspection, and Industrial Stormwater Inspection of the above referenced facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. A copy of each inspection report is enclosed for your records.

Please refer to the “Summary of Findings” section of each inspection report and provide a written response for each item that was noted. This response should be mailed to the attention of the Office of Water Quality Compliance Branch at the address below my signature or emailed to Water-Inspection-Report@adeq.state.ar.us. This response should contain documentation describing the course of action taken to correct each item noted. The corrective action(s) should be completed as soon as possible and the written response with all necessary documentation (i.e. photos) is due by **April 17, 2025**.

If I can be of any assistance, please contact me at travis.harmon@arkansas.gov or (501) 837-2070.

Sincerely,

A handwritten signature in cursive script that reads "Travis Harmon".

Travis Harmon
Inspector, Office of Water Quality

CC via email: gkremers@citycorporation.com

 ENVIRONMENTAL QUALITY	OFFICE OF WATER QUALITY INSPECTION REPORT		
	AFIN: 58-00105 PERMIT #: AR0021768		DATE: 3/6/2025
	COUNTY: 58 Pope	PDS #: 133114	MEDIA: WN
	GPS LAT: 35.248990 LONG: -93.116102 LOCATION: General Area		
FACILITY INFORMATION		INSPECTION INFORMATION	
NAME: City Corporation LOCATION: 404 Jimmy Lile Road CITY: Russellville, AR 72801		FACILITY TYPE: 1 - Municipal INSPECTOR ID#: 34689 S - State FACILITY EVALUATION RATING: 3 - Satisfactory INSPECTION TYPE: Compliance Evaluation DATE(S): 3/6/2025 ENTRY TIME: 09:30 EXIT TIME: 12:00 PERMIT EFFECTIVE DATE: 8/1/2023 PERMIT EXPIRATION DATE: 7/31/2028	
RESPONSIBLE OFFICIAL		FAYETTEVILLE SHALE RELATED: N	
NAME / TITLE: Mr. Steve Mallett, Jr. / CEO COMPANY: City Corporation- Russellville Water and Sewer System Pollution Control Facility MAILING ADDRESS: PO Box 3186 CITY, STATE, ZIP: Russellville AR 72811 PHONE & EXT: / FAX: 479--968-2080 / EMAIL: smallett@citycorporation.com		FAYETTEVILLE SHALE VIOLATIONS: N	
CONTACTED DURING INSPECTION: No		INSPECTION PARTICIPANTS	
		NAME/TITLE/PHONE/FAX/EMAIL/ETC.: Greg Kremers/ Wastewater & Pretreatment Operations Director/ 479-449-0365/ gkremers@citycorporation.com Tony Sanchez/ Senior Operator	
AREA EVALUATIONS (S=Satisfactory, M=Marginal, U=Unsatisfactory, N=Not Applicable/Evaluated)			
S	PERMIT	S	FLOW MEASUREMENT
S	RECORDS/REPORTS	N	LABORATORY
M	OPERATION & MAINTENANCE	S	EFFLUENT/RECEIVING WATER
S	SAMPLING	S	SLUDGE HANDLING/DISPOSAL
N	OTHER:	N	STORMWATER
		N	FACILITY SITE REVIEW
		N	SELF-MONITORING PROGRAM
		N	PRETREATMENT

SUMMARY OF FINDINGS

- The October 2024 biomonitoring report lists a dilution series of 75%. This should be 80% per Part II.9.A of the permit. The facility should contact the contract lab and inform of the dilution series.
- At the time of inspection, one of the bar screens was needing repair and west grit removal was down. Also, one of two sludge tank mixers was out for repair. Per Part III.B.1.A of the permit, the bar screen and the sludge tank mixer should be repaired and retuned to operation. Per Mr. Kremers, the facility will need to wait for low flow conditions to repair the bar screen. The facility reported a SSO at the headworks on February 14, 2025, which was due to the equalization basins being at capacity at that time.

GENERAL COMMENTS

Introduction

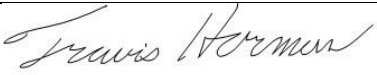
I inspected on March 6, 2025. The inspection was scheduled and Mr. Greg Kremers, Wastewater and Pretreatment Operations Director, and Mr. Tony Sanchez, Senior Operator, represented the facility. City Corporation operates a WWTP for the City of Russellville. The WWTP is designed to treat 8.5 MGD. I also conducted a lift stations inspection (PDS 133115) and IGP No Exposure inspection (PDS 133116).

WWTP Inspection

Mr. Sanchez accompanied me during the WWTP inspection. Treatment consists of bar screening and grit removal, influent can be stored in three aerated equalization basins if needed, followed by an anaerobic selector, then treatment in four activated sludge basins each with an anaerobic zone, aerobic zone, and a final aerated zone which is used as needed, three secondary clarifiers, peracetic acid disinfection with contact basin, prior to discharge. Aerobic sludge tanks and a sludge press are used for sludge. At the time of inspection, one of the bar screens was needing repair and west grit removal was down. Also, one of two sludge tank mixers was out for repair.

Records Review

I reviewed DMR from January through December 2024 prior to the inspection. During this period, the facility reported NH3-N and FCB exceedances in January, NH3-N, Residual PAA, and FCB exceedances in February, TSS and FCB exceedances in March, Residual PAA and FCB exceedances in April, Residual PAA exceedance in November, and TSS, and NH3-N exceedances in December. These exceedances were reported in monthly DMR as required. Mr. Kremers provided analysis results for the month of December 2024 for averaging and loading calculations, please see page 7 of 19, as well as a lab bench sheet, and a lab chain of custody sheet. I left a lab records request which the facility will submit to OWQ. I also reviewed the October biomonitoring report available on NetDMR and the facility will need to contact the contract lab and request dilution series of 0, 32, 42, 56, 80, 100%.

INSPECTOR'S SIGNATURE:  Travis Harmon	DATE: 3/21/2025
SUPERVISOR'S SIGNATURE:  Amy Huneycutt	DATE: 3/27/2025

SECTION A: PERMIT VERIFICATION

PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS

☒S ☐M ☐U ☐NA ☐NE

DETAILS:

1. CORRECT NAME AND MAILING ADDRESS OF PERMITTEE: ☒Y ☐N ☐NA ☐NE2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES: ☐Y ☐N ☒NA ☐NE3. NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT: ☒Y ☐N ☐NA ☐NE4. ALL DISCHARGES ARE PERMITTED: ☒Y ☐N ☐NA ☐NE**SECTION B: RECORDKEEPING AND REPORTING EVALUATION**

RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT

☒S ☐M ☐U ☐NA ☐NEDETAILS: Please see Page #6 TSS mg/l average. Left a lab records request for submittal to OWQ.1. ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS: ☒Y ☐N ☐NA ☐NE2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE: ☒S ☐M ☐U ☐NA ☐NEa. DATES AND TIME(S) OF SAMPLING: ☒Y ☐N ☐NA ☐NEb. EXACT LOCATION(S) OF SAMPLING: ☒Y ☐N ☐NA ☐NEc. NAME OF INDIVIDUAL PERFORMING SAMPLING: ☒Y ☐N ☐NA ☐NEd. ANALYTICAL METHODS AND TECHNIQUES: ☐Y ☐N ☐NA ☒NEe. RESULTS OF CALIBRATIONS: ☐Y ☐N ☐NA ☒NEf. RESULTS OF ANALYSES: ☒Y ☐N ☐NA ☐NEg. DATES AND TIMES OF ANALYSES: ☐Y ☐N ☐NA ☒NEh. NAME OF PERSON(S) PERFORMING ANALYSES: ☐Y ☐N ☐NA ☒NE3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE: ☐S ☐M ☐U ☐NA ☒NE4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR: ☐S ☐M ☐U ☐NA ☒NE5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA: ☒Y ☐N ☐NA ☐NE**SECTION C: OPERATIONS AND MAINTENANCE**

TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED

☐S ☒M ☐U ☐NA ☐NEDETAILS: A bar screen is needing repair and a digester mixer was out for repair.1. TREATMENT UNITS PROPERLY OPERATED: ☒S ☐M ☐U ☐NA ☐NE2. TREATMENT UNITS PROPERLY MAINTAINED: ☐S ☒M ☐U ☐NA ☐NE3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED: ☒S ☐M ☐U ☐NA ☐NE4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE: ☒S ☐M ☐U ☐NA ☐NE5. ALL NEEDED TREATMENT UNITS IN SERVICE: ☒S ☐M ☐U ☐NA ☐NE6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: ☒S ☐M ☐U ☐NA ☐NE7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED: ☐S ☐M ☐U ☐NA ☒NE8. OPERATION AND MAINTENANCE MANUAL AVAILABLE: ☒Y ☐N ☐NA ☐NE9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED: ☒Y ☐N ☐NA ☐NE10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED: ☒Y ☐N ☐NA ☐NE11. HAVE BYPASSES/OVERFLOWS OCCURRED AT THE PLANT OR IN THE COLLECTION SYSTEM IN THE LAST YEAR: ☒Y ☐N ☐NA ☐NE12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: ☒Y ☐N ☐NA ☐NE13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS: Pending, See summary of findings. ☒Y ☐N ☐NA ☐NE14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT: ☒Y ☐N ☐NA ☐NE15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT: Reported SSOs at plant headworks 5/5/2024, 2/11-12/2025 ☒Y ☐N ☐NA ☐NE

SECTION D: SAMPLING	
PERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS: <u>Left lab records request for submittal to OWQ</u>	
1. SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
2. LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	☒ Y ☐ N ☐ NA ☐ NE
3. FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
4. SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
5. SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	☒ Y ☐ N ☐ NA ☐ NE
6. SAMPLE COLLECTION PROCEDURES ADEQUATE:	☒ Y ☐ N ☐ NA ☐ NE
a. SAMPLES REFRIGERATED DURING COMPOSITING:	☒ Y ☐ N ☐ NA ☐ NE
b. PROPER PRESERVATION TECHNIQUES USED:	☒ Y ☐ N ☐ NA ☐ NE
c. CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	☐ Y ☐ N ☐ NA ☒ NE
7. IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	☐ Y ☐ N ☒ NA ☐ NE
SECTION E: FLOW MEASUREMENT	
PERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	☒ S ☐ M ☐ U ☐ NA ☐ NE
DETAILS:	
1. PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED:___ TYPE OF DEVICE: <u>Rectangular weir</u>	☒ Y ☐ N ☐ NA ☐ NE
2. FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	☒ Y ☐ N ☐ NA ☐ NE
3. SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	☒ Y ☐ N ☐ NA ☐ NE
4. CALIBRATION FREQUENCY ADEQUATE: <u>Calibrated 8/16/2024</u>	☒ Y ☐ N ☐ NA ☐ NE
5. RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	☒ Y ☐ N ☐ NA ☐ NE
6. CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE:	☒ Y ☐ N ☐ NA ☐ NE
7. FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☒ Y ☐ N ☐ NA ☐ NE
8. FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	☒ Y ☐ N ☐ NA ☐ NE
9. HEAD MEASURED AT PROPER LOCATION:	☒ Y ☐ N ☐ NA ☐ NE
SECTION F: LABORATORY	
PERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	☐ S ☒ M ☐ U ☐ NA ☒ NE
DETAILS: <u>Left lab records request for submittal to OWQ</u>	
1. EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	☐ Y ☐ N ☐ NA ☒ NE
2. IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	☐ Y ☐ N ☐ NA ☒ NE
3. SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☐ Y ☐ N ☐ NA ☒ NE
4. QUALITY CONTROL PROCEDURES ADEQUATE:	☐ Y ☐ N ☐ NA ☒ NE
5. DUPLICATE SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	☐ Y ☐ N ☐ NA ☒ NE
6. SPIKED SAMPLES ARE ANALYZED $\geq 10\%$ OF THE TIME:	☐ Y ☐ N ☐ NA ☒ NE
7. COMMERCIAL LABORATORY USED:	☐ Y ☒ N ☐ NA ☐ NE
a. LAB NAME:	
b. LAB ADDRESS:	
c. PARAMETERS PERFORMED:	
8. BIOMONITORING PROCEDURES ADEQUATE: <u>Pace Analytical Services, LLC, 9608 Loiret Avenue, Lenexa, KS. October 28, 2024.</u>	☒ Y ☐ N ☐ NA ☐ NE
a. PROPER ORGANISMS USED:	☒ Y ☐ N ☐ NA ☐ NE
b. PROPER DILUTION SERIES FOLLOWED: <u>Report used 0, 32, 42, 56, 75, 100%. Should be 0, 32, 42, 56, 80, 100%.</u>	☐ Y ☒ N ☐ NA ☐ NE
c. PROPER TEST METHODS AND DURATION:	☒ Y ☐ N ☐ NA ☐ NE
d. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	☐ Y ☐ N ☒ NA ☐ NE

SECTION G: EFFLUENT/RECEIVING WATERS OBSERVATIONS							
BASED ON VISUAL OBSERVATIONS ONLY						☒ S ☐ M ☐ U ☐ NA ☐ NE	
DETAILS: <u>Viewed at weir</u>							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER
001	none	none	slight	none	none	Slight turbidity	--
SECTION H: SLUDGE DISPOSAL							
SLUDGE DISPOSAL MEETS PERMIT REQUIREMENTS						☒ S ☐ M ☐ U ☐ NA ☐ NE	
DETAILS: <u>Permit# 4723-WG-WR-5</u>							
1. SLUDGE MANAGEMENT ADEQUATE TO MAINTAIN EFFLUENT QUALITY:						☒ S ☐ M ☐ U ☐ NA ☐ NE	
2. SLUDGE RECORDS MAINTAINED AS REQUIRED BY 40 CFR 503:						☐ S ☐ M ☐ U ☐ NA ☒ NE	
3. FOR LAND APPLIED SLUDGE, TYPE OF LAND APPLIED TO: (E.G., FOREST, AGRICULTURAL, PUBLIC CONTACT SITE):							
SECTION I: SAMPLING INSPECTION PROCEDURES							
SAMPLE RESULTS WITHIN PERMIT REQUIREMENTS						☐ S ☐ M ☐ U ☒ NA ☐ NE	
DETAILS:							
1. SAMPLES OBTAINED THIS INSPECTION:						☐ Y ☐ N ☒ NA ☐ NE	
2. TYPE OF SAMPLE: ☐ GRAB:___ ☐ COMPOSITE:___ METHOD:___ FREQUENCY:___							
3. SAMPLES PRESERVED:						☐ Y ☐ N ☒ NA ☐ NE	
4. FLOW PROPORTIONED SAMPLES OBTAINED:						☐ Y ☐ N ☒ NA ☐ NE	
5. SAMPLE OBTAINED FROM FACILITY'S SAMPLING DEVICE:						☐ Y ☐ N ☒ NA ☐ NE	
6. SAMPLE REPRESENTATIVE OF VOLUME AND NATURE OF DISCHARGE:						☐ Y ☐ N ☒ NA ☐ NE	
7. SAMPLE SPLIT WITH PERMITTEE:						☐ Y ☐ N ☒ NA ☐ NE	
8. CHAIN-OF-CUSTODY PROCEDURES EMPLOYED:						☐ Y ☐ N ☒ NA ☐ NE	
9. SAMPLES COLLECTED IN ACCORDANCE WITH PERMIT:						☐ Y ☐ N ☒ NA ☐ NE	
SECTION J: STORM WATER POLLUTION PREVENTION PLAN							
STORM WATER MANAGEMENT MEETS PERMIT REQUIREMENTS						☒ S ☐ M ☐ U ☐ NA ☐ NE	
DETAILS: <u>No Exposure ARR000104</u>							
1. SWPPP UPDATED AS NEEDED:___ DATE OF LAST UPDATE:___						☐ Y ☐ N ☒ NA ☐ NE	
2. SITE MAP INCLUDING ALL DISCHARGES AND SURFACE WATERS:						☐ Y ☐ N ☒ NA ☐ NE	
3. POLLUTION PREVENTION TEAM IDENTIFIED:						☐ Y ☐ N ☒ NA ☐ NE	
4. POLLUTION PREVENTION TEAM PROPERLY TRAINED:						☐ Y ☐ N ☒ NA ☐ NE	
5. LIST OF POTENTIAL POLLUTANT SOURCES:						☐ Y ☐ N ☒ NA ☐ NE	
6. LIST OF POTENTIAL SOURCES AND PAST SPILLS AND LEAKS:						☐ Y ☐ N ☒ NA ☐ NE	
7. ALL NON-STORM WATER DISCHARGES ARE AUTHORIZED:						☐ Y ☐ N ☒ NA ☐ NE	
8. LIST OF STRUCTURAL BMPS:						☐ Y ☐ N ☒ NA ☐ NE	
9. LIST OF NON-STRUCTURAL BMPS:						☐ Y ☐ N ☒ NA ☐ NE	
10. BMPS PROPERLY OPERATED AND MAINTAINED:						☐ Y ☐ N ☒ NA ☐ NE	
11. INSPECTIONS CONDUCTED AS REQUIRED:						☐ Y ☐ N ☒ NA ☐ NE	

DMR Calculation Check

Reporting Period:	From	<u>2024</u>	<u>12</u>	<u>01</u>	To	<u>2024</u>	<u>12</u>	<u>31</u>
		Year	Month	Day		Year	Month	Day

Parameter Checked: TSS

	Loading	Concentration	
	Mass	Monthly	
	Mo. Avg. - lbs/day	Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	<u>474.7</u>	<u>13.6</u>	<u>31.2</u>
Calculated Value:	<u>474.7</u>	<u>11.6</u>	<u>31.2</u>
Permit Value:	1417.8	20.0	30.0

If calculated value does not equal reported value, explain:

Possible data entry issue. 13.6 was entered to NetDMR while the facility spreadsheet shows an average of 11.6 which is an accurate average calculation.

DMR Calculation Check

Reporting Period:	From	<u>2024</u>	<u>12</u>	<u>01</u>	To	<u>2024</u>	<u>12</u>	<u>31</u>
		Year	Month	Day		Year	Month	Day

Parameter Checked: CBOD

	Loading Mass Mo. Avg. - lbs/day	Concentration Monthly Mo. Avg. - mg/l	7-day Avg. - mg/l
Reported Value:	204.4	5.9	6.7
Calculated Value:	204.4	5.9	6.7
Permit Value:	638.0	9.0	14

If calculated value does not equal reported value, explain:

Office of Water Quality Photographic Evidence Sheet						
Location:		City Corporation				
Photographer:		Travis Harmon	Date:	March 6, 2025	Time:	1000
Witness:		None- no other regulatory personnel			Photo #:	1
Description:		Influent bar screens				
						
Photographer:		Travis Harmon	Date:	March 6, 2025	Time:	1000
Witness:		None			Photo #:	2
Description:		One of the bar screens needs repair. Facility has to wait for low flow conditions to make the repair.				
						

Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1001
Witness:	None			Photo #:	3
Description:	Additional screening.				
					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1001
Witness:	None			Photo #:	4
Description:	West side screening is down due to pending repair in Photo #2.				
					

Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1006
Witness:	None			Photo #:	5
Description:	Recent SSO at headworks. The facility reported on February 14, 2025.				
 A photograph showing a large area of exposed, eroded soil and sediment. The soil is light brown and appears wet and disturbed. To the left, there is a concrete curb or wall. The background shows a grassy area and some distant structures. An orange timestamp "03.06.2025 10:06" is visible in the bottom right corner of the photo.					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1017
Witness:	None			Photo #:	6
Description:	Anaerobic selector				
 A photograph of a large, rectangular tank filled with dark, murky water. A floating device, possibly a pump or aeration system, is visible in the center of the tank. In the background, there are industrial buildings and a clear blue sky. In the foreground, there is a metal railing. An orange timestamp "03.06.2025 10:17" is visible in the bottom right corner of the photo.					

Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1024
Witness:	None			Photo #:	7
Description:	4 activated sludge basins. Each with an anaerobic, aerobic, and additional air (if needed) zone.				
 A wide-angle photograph of four activated sludge basins. The water is a murky brown color, covered with a thick layer of white foam and small bubbles. In the foreground, there is a metal walkway with railings. In the background, there are some trees and a clear blue sky. A timestamp '03.06.2025 10:24' is visible in the bottom right corner of the photo.					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1026
Witness:	None			Photo #:	8
Description:	3 secondary clarifiers				
 A photograph of three secondary clarifiers. The water is clear and blue. There are metal walkways and railings in the foreground. In the background, there are some trees and a clear blue sky. A timestamp '03.06.2025 10:26' is visible in the bottom right corner of the photo.					

Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1027
Witness:	None			Photo #:	9
Description:	View of secondary clarifier effluent. All three clarifiers with weir covers.				
					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1036
Witness:	None			Photo #:	10
Description:	Peracetic acid disinfection				
					

Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1037
Witness:	None			Photo #:	11
Description:	Composite sampler. Refrigerated at proper temperature.				
					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1037
Witness:	None			Photo #:	12
Description:	Composite sampler programmed for aliquot grabs.				
					

Office of Water Quality Photographic Evidence Sheet			
Location:	City Corporation		
Photographer:	Travis Harmon	Date:	March 6, 2025
Witness:	None	Time:	1039
		Photo #:	13
Description:	View of effluent weir and view of final effluent quality.		
			
Photographer:	Travis Harmon	Date:	March 6, 2025
Witness:	None	Time:	1042
		Photo #:	14
Description:	Effluent flow meter calibrated 8/16/2024 by OIC, Inc.		
			

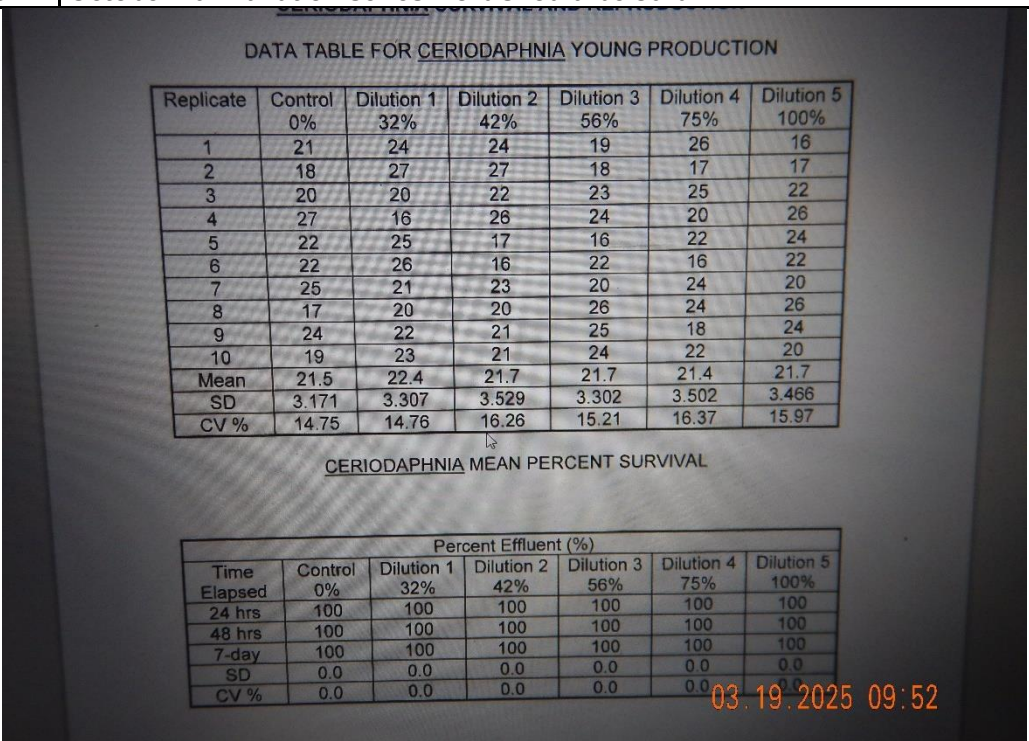
Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1049
Witness:	None			Photo #:	15
Description:	Sludge press				
					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1055
Witness:	None			Photo #:	16
Description:	Aerobic sludge tanks with 1 of 2 mixers removed for repair.				
					

Office of Water Quality Photographic Evidence Sheet					
Location:	City Corporation				
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1110
Witness:	None			Photo #:	17
Description:	First of three aerated equalization basins				
					
Photographer:	Travis Harmon	Date:	March 6, 2025	Time:	1110
Witness:	None			Photo #:	18
Description:	Center equalization basin.				
					

Office of Water Quality Photographic Evidence Sheet			
Location:	City Corporation		
Photographer:	Travis Harmon	Date:	March 6, 2025
Time:			1116
Witness:	None		Photo #:
			19
Description:	Third equalization basin.		



Location:	City Corporation		
Photographer:	Travis Harmon	Date:	March 19, 2025
Time:			0952
Witness:	None		Photo #:
			20
Description:	October 2024 dilution series. 75% should be 80%.		



DATA TABLE FOR CERIODAPHNIA YOUNG PRODUCTION

Replicate	Control 0%	Dilution 1 32%	Dilution 2 42%	Dilution 3 56%	Dilution 4 75%	Dilution 5 100%
1	21	24	24	19	26	16
2	18	27	27	18	17	17
3	20	20	22	23	25	22
4	27	16	26	24	20	26
5	22	25	17	16	22	24
6	22	26	16	22	16	22
7	25	21	23	20	24	20
8	17	20	20	26	24	26
9	24	22	21	25	18	24
10	19	23	21	24	22	20
Mean	21.5	22.4	21.7	21.7	21.4	21.7
SD	3.171	3.307	3.529	3.302	3.502	3.466
CV %	14.75	14.76	16.26	15.21	16.37	15.97

CERIODAPHNIA MEAN PERCENT SURVIVAL

Time Elapsed	Percent Effluent (%)					
	Control 0%	Dilution 1 32%	Dilution 2 42%	Dilution 3 56%	Dilution 4 75%	Dilution 5 100%
24 hrs	100	100	100	100	100	100
48 hrs	100	100	100	100	100	100
7-day	100	100	100	100	100	100
SD	0.0	0.0	0.0	0.0	0.0	0.0
CV %	0.0	0.0	0.0	0.0	0.0	0.0

Google Earth (WWTP has been modified since most recent satellite image):



From: Travis Harmon (adpce.ad)
Sent: Thursday, April 17, 2025 11:06 AM
To: Uniqika Marshall (adpce.ad)
Subject: PDS 133114 Response
Attachments: DEQ Inspection Response.pdf

Uniqika,

Could you attach the PDF response to PDS #133114? Received this morning in my email.

Thanks,
Travis



P. 479-968-2105
F. 479-968-3265

"Award Winning Water"

April 17th, 2025

Mr. Travis Harmon
Office of Water Quality - DEQ
1220 West 2nd Street
Russellville, AR 72801

Dear Mr. Harmon,

This letter is in response to the findings of your inspection of the City Corporation Pollution Control Works facility on March 6, 2025. City Corporation offers the following responses to those findings:

Finding 1 – *"The October 2024 biomonitoring report lists a dilution series of 75%. This should be 80% per Part II.9.A of the permit. The facility should contact the contract lab and inform of the dilution series."*

Response – PCW lab personnel were aware of this issue prior to your inspection and had notified the contract lab (EEG) of this oversight via email and in person as early as October 11, 2024. Beginning the 1st quarter 2025, the dilution series requirements were included on the chain of custody as a reminder to the contract lab and will continue to be included on all future chain of custodies (See attachment).

Finding 2 – *"At the time of inspection, one of the bar screens was needing repair and west grit removal was down. Also, one of the two sludge tank mixers was out for repair. Per Part III.B.1.A of the permit, the bar screen and the sludge tank mixer should be repaired and returned to operation. Per Mr. Kremers, the facility will need to wait for low flow conditions to repair the bar screen. The facility reported a SSO at the headworks on February 14th, 2025 which was due to the equalization basins being at capacity at that time."*

Response – With mechanical bar screens in place downstream of the bar screen in question, it was decided that the failed screen could be removed without causing any loss in screening ability at the head works. Maintenance work order 16-27086 was created to remove the bar screen, with a scheduled completion date of May 3, 2025 (see attachment). Plant personnel were aware of the issue with the west grit removal system and have been waiting for influent flows to decrease to a point where it is possible to keep water within the east chamber of the grit basin to be able to access the west. Maintenance work order 16-27087 was created to drain the west grit basin and make the necessary repairs to the grit bucket conveyor system. The scheduled date of completion is May 2, 2025 (See attachment).

205 W. 3rd Place
PO Box 3186
Russellville, AR 72811
citycorporation.com



P. 479-968-2105
F. 479-968-3265

"Award Winning Water"

The east sludge tank mixer pump was removed from service due to overheating alarms and picked up by Jack Tyler Engineering on September 16th, 2024 for evaluation. We were notified by JTE on October 18, 2024 that the pump experienced cavitation damage to the lower seal plate and that parts were being sourced. In the meantime, we have been able to keep the east sludge tank partially mixed with the aeration system and have experienced no issues as a result. The pump was returned to us on April 10, 2025 and installed by maintenance personnel on April 15, 2025. However, it was found that the pump is still experiencing some type of internal issue that is causing a high amperage draw. JTE is continuing to troubleshoot the issue and correct, at which time the pump will be put back in service.

Should you have any questions or need additional information, please contact Greg Kremers, Wastewater Operations Director at 479-449-0365.

Sincerely,

Steve Mallett, Jr., P.E.
Chief Executive Officer
City Corporation – Russellville Water & Sewer

[illegible]

General

Overview

Work Order ID

WO-16-27087

Work Order ID

WO-16-27087

Asset ID

3675-ELEVATOR-WEST

Asset Description

DRIFT BUCKET ELEVATOR WEST

Comments

rebar broken in both

Attachments

Asset History

Job Plan ID

Expense Class

Project WO

Type

TECHNICAL INC

Latitude

Longitude

Project

Project ID

Project Stage ID

Future Analysis

Future Model

Schedule

Notes

Schedule

Estimated Craft

There are no results to display.

General

Work Priority

Weighted Priority

Assigned To

Assigned By

Reported By

Reported Date

4/7/2025 1:56 PM

Skills

There are no results to display.

Tools

There are no results to display.

Status

Sub Status

Print

Print Label

Work Order ID

Assign

Approve

Approved Date

4/7/2025

Approved

Approved

Requested

Start Date

Finish Date

Scheduling

Start Date

5/1/2025 1:00:00 PM

Finish Date

5/2/2025 1:00:00 PM

Duration

0d 0h 0m

Duration

1d 0h 0m

Actuals

Start Date

Finish Date

Duration

0d 0h 0m

Duration

1d 0h 0m

East Sludge Tank Pump Installed





**DIVISION OF
ENVIRONMENTAL QUALITY**

Sarah Huckabee Sanders
GOVERNOR

Shane E. Khoury
SECRETARY

April 21, 2025

Mr. Steve Mallett, Jr, General Manager
City Corporation- Russellville Water and Sewer System Pollution Control Facility
PO Box 3186
Russellville, AR 72811
Email Address: smallett@citycorporation.com

RE: Adequate Response to City Corporation WWTP Inspection- PDS# 133114
AFIN: 58-00105 Permit No.: AR0021768

Dear Mr. Mallett:

I have reviewed the response pertaining to my inspection of the City Corporation WWTP. The information provided sufficiently addresses the items referenced in my inspection report. At this time, the Division has no further comment concerning this inspection. Acceptance of this response by the Division does not preclude any future enforcement action deemed necessary at this site or any other site.

If I require further information concerning this matter, I will contact you. Thank you for your attention to this matter. Should you have any questions please contact me at (501) 837-2070 or you may email me at travis.harmon@adeq.state.ar.us.

Sincerely,

A handwritten signature in black ink that reads "Travis Harmon".

Travis Harmon
Inspector, Office of Water Quality

CC via email: gkremers@citycorporation.com