



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1445 ROSS AVENUE, SUITE 1200
DALLAS, TEXAS 75202-2733

January 03, 2017

CERTIFIED MAIL-RETURN RECEIPT REQUESTED: 7014 0150 0000 2454 0229

Mr. Carl Geffken
City Administrator
City of Fort Smith
623 Garrison Avenue
P.O. Box 1908
Fort Smith, AR 72902

Re: NPDES Permit Nos.: AR0033278 and AR0021750
Civil Action No. 2:14-cv-02266-PKH
CMOM – Standard Operating Procedures Program Plan for EPA Review and Approval

Dear Mr. Geffken:

This office has received the City of Fort Smith's (City) Standard Operating Procedures (SOPs) component of the Capacity, Management, Operation, and Maintenance (CMOM) Program, pursuant to Paragraph 53 of the Consent Decree in the above-captioned case. EPA has reviewed this submittal dated June 28, 2016, and has concerns regarding the proposed SOPs development schedules.

As documented in the City's SOP Program Plan (illustrated on Page 3-2 in Table 3-1), these schedules range from two years (24 months) to six years (72 months). EPA currently expects that standard practice final SOPs take no more than one year (12 months) to develop and implement in order to achieve the goals and objectives of this Consent Decree.

However, EPA has decided to approve this submittal and allow the City to continue with its proposed SOP timetables, provided that the City's proposed SOP timetables for development or finalization do not disturb the Consent Decree goals or objectives. This includes a standardized set of instructions to be utilized by the Utility Department so as to promote the safe, effective, and successful work processes related to the operation and maintenance of the wastewater collection and transmission system.

If you have any questions, please contact Mr. Damon McElroy, P.E., at (214) 665-7159 or by e-mail at mcelroy.damon@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Jerry Saunders".

Jerry Saunders
Associate Director
Water Enforcement Branch

Re: City of Fort Smith 2
Standard Operating Procedures Program Plan

cc: Jerry L. Canfield, P.A.
Daily & Woods, P.L.L.C.
58 South Sixth Street
P.O. Box 1446
Fort Smith, AR 72902

Becky Keogh, Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Thomas Mariani, Section Chief
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-1-1-08677

Robert Roddy, Director of Utilities
City of Fort Smith
3900 Kelley Highway
Fort Smith, AR 72904

Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201

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