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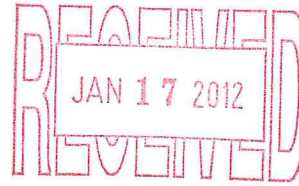
# CITY CORPORATION

Russellville Water and Sewer System

205 West 3rd Place PO Box 3186 Russellville, AR 72811-3186

Phone (479) 968-2105  
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January 13, 2012



Mr. Alan Anderson  
Enforcement Administrator  
NPDES Enforcement Section  
Arkansas Department of Environmental Quality  
5301 Northshore Dr  
North Little Rock, Arkansas 72118

JAN 13 2012

**RE: Quarterly progress report on "Operations Modifications Evaluation Program"**  
**NPDES Permit No. AR0021768**  
**CAO LIS No. 09-146**  
**AFIN 58-00105**

Kn 2:30

Dear Mr. Anderson:

In accordance with the above referenced Consent Administrative Order executed November 6, 2009, and the Corrective Action Plan dated May 28, 2010, City Corporation is submitting this progress report to provide information pursuant to modifications for nitrate removal at City Corporation's Pollution Control Works (PCW). The initial "Operations Modifications Evaluation Program" was submitted to ADEQ on August 31, 2010.

Outlined below is a summary of activities which occurred from the previous quarterly progress report dated, October 7, 2011.

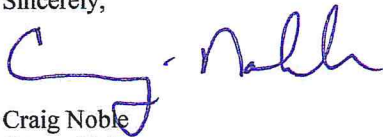
1. October 5, 2011: A meeting was conducted between CDM and ADEQ to present the preliminary recommendations of the improvements necessary for CAO compliance at the PCW. Attached is a record of the meeting minutes.
2. November 7, 2011: CDM provided a formal presentation to the City Corporation Board who recommended a presentation and subsequent resolution of support from the Russellville City Council regarding the findings of the Preliminary Engineering Report (PER) and support of a bond issuance to finance the improvements.
3. November 22, 2011: CDM provided a formal presentation to a joint meeting of the City Corporation Board and the Russellville City Council.
4. December 5, 2011: Russellville City Council Finance Committee presentation and recommendation for approval by the full City Council.
5. December 15, 2011: City Council regularly scheduled meeting approved Resolution No.: 1261 Supporting the Intent of City Corporation to make Expenditures Toward the Required and Necessary Capital Improvements to Maintain and Improve the Required Environmental Health Federal and State Standards for the Russellville Municipal Wastewater System and For Other Purposes. Attached is a copy of the resolution.

6. December 30, 2011: City Corporation executed a contract with CDM Smith (formerly Camp Dresser & McKee Inc – CDM) to provide design services for the improvements outlined in the Preliminary Engineering Report (PER) and supported by Resolution No. 1261 for CAO compliance at the WWTP. Attached is a copy of the Preliminary Engineering Report for Development of WWTP Corrective Action Plan.
7. January 10, 2012: CDM Smith conducted a design kickoff meeting for the improvements outlined in the PER with City Corporation and CWB Engineers, Inc...
8. January 13, 2012: City Corporation is submitting to ADEQ with this transmittal the Revised Corrective Action Plan dated January 13, 2012. Attached is an original submittal of the Revised Corrective Action Plan.

With submission of this quarterly report, we are asking for a meeting with key members of ADEQ staff, to discuss the final PER recommendations and the Revised Corrective Action Plan, dated January 12, 2012.

If you have any questions concerning this Quarterly Progress Report, please call Larry Collins at 479.968.2080, extension 132.

Sincerely,



Craig Noble  
General Manager

cc: Larry Collins  
Randy Bradley  
Clint Bell  
Craig Johnson  
File