



March 28, 2012

Mr. Alan Anderson
Water Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317



Re: City Corporation – CAO
Collection System Remediation
NPDES Permit No. AR0021768
CAO LIS No. 09-146
AFIN 58-00105

Dear Mr. Anderson,

I am writing this letter in regards to the Consent Administrative Order for City Corporation and the corresponding Corrective Action Plan dated May 28, 2010. The Corrective Action Plan (CAP) outlines a date of March 2012 for the start of collection system remediation. City Corporation has fulfilled this obligation and continues to make improvements to the collection system.

I am pleased to report that City Corporation refocused its in-house I/I crew in June of 2010. The I/I crew has been studying, identifying, and repairing sources of I/I throughout the system. City Corporation has also contracted the services of RJN Group to complete SSES work in the system. Through the redoubling of efforts of the I/I crew and outside contractors, City Corporation has made several collection system repairs in 2010 and 2011.

In the past two years, City Corporation has repaired or replaced approximately 1817 linear feet of pipe. City Corporation has inspected 1136 manholes and completed rehabilitation on 24 manholes in the system. Additionally, 45,700 linear feet of pipe has been cleaned and 113,685 linear feet has been televised. City Corporation has also completed 95 repairs on private laterals. Approximately 249,488 linear feet of pipe was smoke tested in the collection system.

CWB Engineers, Inc. is currently under design on three large collection system improvement projects for City Corporation. The East 2nd Street project will replace approximately 11,500 LF of 10"-18" sewer pipe and improve hydraulic capacity in the system. Design is under final review and construction for this project is anticipated to begin this summer. CWB Engineers is completing design of the first three basins identified in the Phase I Report from RJN Group. Design of the Basins 7, 14, and 23 project will be complete by June 2012. Construction is anticipated to start in the fall of 2012. The City Mall project will replace approximately 8,800 LF of sewer pipe. This project includes replacing a portion of the sewer line that runs under the city mall and re-routing the line around the mall. Design of this project should be complete in the fall of 2012 and construction should begin in 2013.

Sincerely,

Clint W. Bell, P.E.
CWB Engineers, Inc.

cc: *Craig Noble*
Larry Collins
Randy Bradley
Craig Johnson - CDM Smith
Walter Wright - Mitchell Williams