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November 9, 2018

Mr. Richard Healey
Enforcement Branch Manager
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118

RE: CAO Extension Request
NPDES Permit No. AR0022292, AFIN 04-00052
City of Decatur, CAO LIS 16-094

Dear Mr. Healey,

Consent Administrative Order LIS No. 16-094 currently requires that the City of Decatur shall complete the requirements of the approved Corrective Action Plan and submit a final compliance report by December 31, 2018. Representatives of the City met with you and other responsible officials from ADEQ on October 11, 2018 to discuss the current construction progress and delays beyond the City's control that will impact their ability to meet the December 31, 2018 final compliance date.

In accordance with Paragraph 6 of the CAO Order and Agreement, the City respectfully requests an extension for final compliance until May 1, 2019 to complete construction of the WWTP improvements, perform startup and commissioning services, and conduct necessary operator training on the new equipment. In support of this request, the City notes the following delays due to circumstances beyond the control of and without the fault of the City:

- **Delay in Start of Construction**

The Arkansas Department of Health approved the plans and specifications for the WWTP improvements on October 17, 2017, and the ADEQ issued State Construction Permit No. AR0022292C effective December 1, 2017. The City was prepared to execute the construction contract at the time of permit issuance, with Contractor mobilization scheduled for January 2018. However, during that time, the final location of the new Simmons processing facility, and where the wastewater from this facility would be sent, was still undecided.

As you are aware, Simmons is a major contributor to the City's WWTP, and as such, had the decision been made to construct the new processing facility outside of the City's service area, this would have significantly impacted or possibly even negated the need for the proposed WWTP improvements. The final location of the Simmons facility and commitment to deliver its wastewater to the City's WWTP was determined in late January 2019. The City subsequently executed the construction contract, and the process of equipment submittal reviews and procurement immediately began. The Contractor was able to mobilize on-site in April 2019, approximately 3 months later than originally planned.

- **Delays in Equipment Lead and Procurement Times**

Given that the WWTP improvements involve a retrofit to an existing facility, the construction schedule is governed by equipment lead times. Although all submittal reviews for equipment with critical lead times were completed on or ahead of schedule, the Contractor has encountered significant delays in procuring the following pieces of equipment:

- **Rotary Drum Screens**
The drum screens were delivered to the site approximately 4 weeks later than originally scheduled, due to delays on the supplier end. This has caused a ripple effect on the overall schedule, as the drum screens need to be fully operational for at least a month prior to bringing the first MBR train on-line.
- **Main PLC**
The main PLC was delivered to the site 3 weeks behind schedule. This was due to delays on the supplier end as well as the PLC being held at U.S. Customs when being delivered from Canada.
- **MBR Equipment**
The Contractor is currently experiencing a delay in receiving all the equipment from necessary to install and prepare the 3 MBR trains for startup. As with the main PLC, all of this equipment is being delivered from Canada. The first MBR tank was delivered on 10/18/2018 (6 weeks behind schedule), the second tank was delivered on 11/09/2018, and the third tank is ready to ship. The Contractor is working diligently with the MBR supplier to minimize any further delays in equipment installation and startup.

The above-mentioned delays have impacted the substantial completion date for the WWTP improvements by approximately 3 months.

Despite these temporary setbacks to the schedule, the City has continued to advance the construction project by having the Contractor install equipment and place into operation as soon as practicable. Below is a brief status update on major equipment items that have already been installed (and placed into operation where noted):

- **New Influent Pumps**
 - Installed and placed into operation – 08/29/2018
 - Required to pump into new rotary drum screens
- **Sludge Press and Conveyor System**
 - Installed and placed into operation – 10/09/2018
 - Allowed City to remove temporary belt filter press and increase sludge processing capabilities
- **UV System**
 - Installed and placed into operation – 11/07/2018
 - Allowed City to significantly improve disinfection capabilities prior to full startup of MBR system

- Rotary Drum Screens and Conveyor System
 - Installed and ready for startup
 - To be placed into operation on 11/12/2018
 - Will provide necessary screening to remove fine particles which could potentially damage the membranes
- Permeate Pumps and Tank
 - Installed and ready for startup
 - To be placed into operation concurrent with MBR train startup
- MBR Blowers
 - Installed and ready for startup
 - To be placed into operation concurrent with MBR train startup
- MBR Tanks
 - Tank #3 installed, connections being made to process piping
 - Train #3 to be placed into operation on 12/17/2018
 - Tanks #1 and #2 delivered to project site

The current construction schedule shows all 3 MBR trains to be started up and operational by January 31, 2019. Given the fact that this project will be the first WWTP with membrane treatment technology in the State of Arkansas, we anticipate a period of up to 90 days after anticipated startup, or May 1, 2019, to allow adequate time for the following:

- Any additional delays in equipment delivery beyond those already experienced;
- Field adjustments to by equipment suppliers after startup;
- Comprehensive operator training on all pieces of equipment; and
- Optimization of equipment operating parameters to ensure final compliance limits are achieved in accordance with the CAO and NDPEs discharge permit.

In making this extension request, the City further notes that it will continue to comply with all other aspects of the CAO and Corrective Action Plan, which includes the timely submission of quarterly CAO and bimonthly CAP progress reports, and implementation of the interim operating measures in the CAP until the WWTP improvements are fully constructed and in operation.

For the reasons stated herein, the City requests the extension of the final compliance date to May 1, 2019. We thank ADEQ for its time during the October 11, 2018 meeting and appreciate your prompt review and consideration of our request. If you have any questions or need additional information, please contact the City's Public Works Manager, James Boston, at 479-752-3912, or Nick Batker with McClelland Consulting Engineers at 469-275-6692.

Sincerely,



Robert Tharp
Mayor, City of Decatur

Cc: James Boston, Decatur Public Works Manager
Nick Batker, McClelland Consulting Engineers