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February 14, 2019

Mr. Gavin Gray
Enforcement Analyst
Water Division, Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: CAP Progress Report No. 6
CAO Progress Report No. 9
NPDES Permit No. AR0022292, AFIN 04-00052
City of Decatur, CAO LIS 16-094
MCE Project No. FY152150

Dear Mr. Gray,

This letter serves as the sixth bimonthly progress report on the Corrective Action Plan dated March 13, 2018, and as the ninth quarterly progress report since the referenced CAO went into effect on January 10, 2017. Following is a summary of progress made towards compliance with the final permitted effluent limits.

Corrective Action Plan Update

The fifth bimonthly progress report was submitted on January 22, 2019. The new screw press/conveyor and UV systems have been in operation for several months now, which has helped improve effluent quality. In addition, the Actiflo system was taken out of operation last month. The process improvements are nearing completion at the WWTP, at which point the remaining corrective action measure (flow diversion to equalization pond under normal flow conditions) will no longer be required. ADEQ will be notified when the CAP measures have been completed and the facility is in compliance with the effluent limitations in the NPDES permit.

Consent Administrative Order Progress Update

Wastewater Treatment Plant Improvements

The City continues to comply with the requirements outlined in the NDPES permit. ADEQ has granted a deferment to the pretreatment program, subject to sampling required by the City and Simmons Foods during the month of May 2019, followed by a summary report due on June 30, 2019.

Crossland Heavy Construction (CHC) has made significant progress on construction of the process improvements at the WWTP. Following is a brief summary of the work completed since the last CAO progress report submitted on November 14, 2018:

- MBR Train #3 started up and placed into operation in mid-December 2018.
- MBR Train #2 started up and placed into operation in mid-January 2019.
- MBR Train #1 started up and placed into operation the last week of January 2019.
- MBR Train #3 taken off-line concurrent with Train #1 startup to address minor work items which could not be completed during the original Train #3 startup due to allowable shutdown time limitations. Train #3 was brought back into full operation during the first week of February 2019.
- Initial owner training has been conducted on the MBR system and will be ongoing in the upcoming weeks.
- Actuators were installed on the existing gates on the influent diversion box.
- Level transmitter was installed at the equalization pond.

Project Schedule

ADEQ executed Amendment No. 1 to the CAO on January 8, 2019, which extended the final compliance deadline to May 1, 2019. Substantial completion of the project is expected by the end of February, with discharge and associated reporting at the 3.8 MGD design flow beginning on March 1, 2019. ADEQ will be formally notified when this occurs. The City will continue to optimize the performance of the newly installed MBR system, and will submit certification of compliance with the effluent limitations in the NPDES permit prior to May 1, 2019.

Please do not hesitate to let me know if you have any questions or need additional information.

Sincerely,

McClelland Consulting Engineers, Inc.

Nicholas R. Batker, PE, CFM

Associate/Senior Project Manager

Cc: Mayor Robert Tharp

James Boston, Director of Public Works Ryan Adler, Crossland Heavy Construction