

ADEQ

ARKANSAS
Department of Environmental Quality

August 20, 2013

CERTIFIED MAIL: 91 7199 9991 7030 4906 4544

Mr. Terry McKinney
City of Benton Utilities
1827 Dale Street
Benton AR 72015

RE: NPDES Permit No. AR0036498, AFIN 63-00063
CAO LIS 11-069 / SSES Review

Dear Mr. McKinney:

The Arkansas Department of Environmental Quality has reviewed the Sanitary Sewer Evaluation Study (SSES) document submitted 8/12/2013.

It was noted that the SSES divided the necessary work into three main sections, manhole repair and rehabilitation (infiltration removal), service line repair and gravity main repair/rehabilitation (inflow removal). Per item 1(b) of the Order and Agreement Section of Consent Administrative Order (CAO) LIS 11-069 the SSES shall include "a milestone schedule which shall detail the steps the Permittee shall take to fully and expeditiously implement the corrective action". The SSES states that the service line repairs have been completed and gives a date of October 2016 for the completion of manhole repair and rehabilitation but no schedule is given regarding the recommended plan for the gravity main projects.

Please respond to ADEQ by **September 20, 2013** with a schedule of dates for the commencement and completion of the individual projects detailed in Tables 4 and 5 of the SSES as well as a final completion date for the City of Benton's collection system rehabilitation and repair project as a whole. These dates will be incorporated into CAO LIS 11-069 by reference and must be adhered to. ADEQ will require an annual report, to be submitted by January 31 of each calendar year, detailing the work undertaken towards the goal of eliminating sanitary sewer overflows in the previous year until the projects are complete and therefore CAO LIS 11-069 will remain open at this time.

Should you have any questions concerning the above referenced compliance issues, please feel free to contact me at 501-682-0631, or you may e-mail me at johnsonm@adeq.state.ar.us.

Sincerely,



Miles Johnson
Enforcement Analyst
Water Division / Enforcement Branch