City of Forrest City

The Hub of Commerce & Industry for Eastern Arkansas

Cedric Williams, Mayor

December 19, 2019

Mr. Layne Pemberton Enforcement Analyst Enforcement Branch ADEQ Office of Water Quality 5301 Northshore Drive North Little Rock, AR 72118

Ref: City of Forrest City; Permit No.: AR0020087 Comprehensive CAP Report per Item 11, 16 & 17 of the CAO

Dear Mr. Pemberton,

In accordance with the Consent Administrative Order (CAO) signed by the City of Forrest City dated October 23, 2017, the City of Forrest City (COFC) is required to submit to ADEQ a comprehensive Corrective Action Plan (CAP) to correct the violations described in paragraph 11, 16 and 17 of the CAO for review and approval. The CAP is to be based on a Sewer System Evaluation Study of the sewer collection system performed with an "overall goal of eliminating capacity and non-capacity related SSO's" referred in the CAO. The plan is to be developed by a P.E. licensed in the State of Arkansas.

In accordance with the agreement, we prepared a two phase work plan to develop the required CAP. The plan was submitted to the ADEQ on March 7, 2018 for review and acceptance. An Inflow Infiltration study of the Forrest City wastewater collection system is to be performed in the first phase of the plan. The study started in April 2018. The final report was completed In Early June 2019. A copy of the final report was submitted on June 28, 2019 by our engineer for your review and acceptance.

Based on the results of the I/I report a second phase work plan was developed to perform follow up studies to locate specific locations of inflows within the system and to perform corrective measures to eliminate those sources. The work plan was also submitted on June 28, 2019 for your review and acceptance. We also prepared a milestone schedule for the second phase workplan. The schedule was submitted as attachment to the workplan for your review and acceptance.

The purpose of this letter is to request you and your agency to allow us a time extension for the completion of the required CAP tasks. Based on the proposed timeline we expect to complete the CAP requirement by June 30, 2023.

We would appreciate your approval of this request for CAP time extension. Please feel free to contact me if you need additional clarifications.

Sincerely,

Cedric Williams, Mayor



Forrest City Water Utility

P.O. Box 816 Forrest City, AR 72336 MEMPHIS TN 380 23 DEC "19 PM 3 L



Mr. Layne Pemberton Enforcement Analyst Enforcement Branch ADEQ Office of Water Quality 5301 North Shore Drive 7211 MARTIN U HILL MULLINGAR MINIGHT