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November 19, 2018

Mr. Layne Pemberton
ADEQ – Water Division, Enforcement Branch
5301 Northshore Drive
North Little Rock, AR 72118-5317

Re: City of Flippin, AR
NPDES Permit No. AR0021717
WWTF Impvts Update

Dear Mr. Pemberton:

The City of Flippin received NPDES Construction Permit (AR0021717C) effective November 1, 2016 for the installation of new screening equipment at their wastewater treatment facility. Bids were received for this work on October 18, 2016, but the bids received exceeded the funding available at the time. A decision was made to revise the plans for the screen installation to include additional work needed at the plant in an effort to achieve a better economy of scale. However, funding for a larger project would require assistance from loan monies available through various funding agencies. As you are aware funding has not been obtained for the improvements planned to the treatment facility. Below is a status update as to why funding has not been obtained and a timeline for implementing modifications to the wastewater treatment processes of the City of Flippin.

Flippin wastewater staff have been dealing with treatment facility issues for quite some time, specifically over the last 2-years flow to the plant has increased to a point in which their normal daily flow volumes cause the facility to run at capacity. During periods of higher flow volumes, the plant is overloaded and forced to go on bypass or risk pushing sludge through the discharge and potentially contaminating the discharge creek. Recently a valve that allows flow from the equalization basin to the main facility lift station was damaged which would not allow the facility to hold any additional flow volume and everything coming into the plant was forced to be bypassed.

The City of Flippin contracted with CEA in mid-2017 to address modifications to the wastewater treatment facility processes so that higher flow volumes could be handled without the need for bypass. CEA's contract would also include preparation of any funding applications to agencies willing to fund the proposed improvements. Mr. Jeremy Stone was enacted as the lead engineer for CEA and tasked with completing funding application(s), a preliminary engineering report, environmental documentation, design plans, and construction management duties. Also, around mid-2017, Flippin received a loan from Arkansas Natural Resources (ANRC) to contract with Arkansas Rural Water to perform cleaning and televising of their existing wastewater collection system which would include a report of any deficiencies found. With the notice that Flippin would be conducting cleaning and televising of the collection system, it was suggested to delay the submission of the funding application(s) so that deficiencies discovered in the collection system could be included in the application(s) for funding. However, a funding

application was submitted to ANRC that included only proposed improvements to the wastewater treatment facility with Flippin staff under the impression that the application was being submitted to both ANRC and USDA-Rural Development. ANRC approved the funding application and offered a loan to Flippin in terms that the City could not agree too. At this time, Flippin directed Mr. Stone to submit a funding application to USDA-Rural Development. This directive was issued around July 2018. Effective September 29, 2018, Mr. Stone was terminated by CEA and was allowed to take the Flippin project with his termination due to his specific knowledge of where the project stood and what improvements were to be constructed for the wastewater treatment facility. In late October Flippin discovered that Mr. Stone had not completed or given the appearance of beginning the funding application to USDA-Rural Development and contacted CEA to request that CEA maintain the project. Flippin also issued a formal statement to Mr. Stone stating they would no longer use his services.

The above background information is provided for clarification as to why the City of Flippin has not proceeded forward to implementing modifications to the wastewater treatment facility. As you are aware, Flippin has been required to submit Non-Compliance Reports, almost monthly, due to violations of their current NPDES Permit and had previously reported that improvements to the wastewater treatment facility would be complete by October 2019. Violations are likely to continue until the improvements to the treatment facility can be fully implemented. Due to Mr. Stone's lack of performance, Flippin is behind schedule in completing these improvements.

CEA has agreed to re-take the project and work to get Flippin back on track; however, the October 2019 date to have improvements completed will not be feasible based on the current status of Flippin's funding application. Enclosed with this letter is realistic timeline in which all phases of the improvements can be achieved. In addition, any work proposed to be completed at the wastewater treatment facility will require the issuance of a new construction permit and the proposed work will increase the design capacity of the facility which will require a modification to their existing NPDES Permit.

At this time, it is requested of ADEQ to close the current construction permit (AR0021717C). CEA will submit a new application for construction and modification to the current NPDES Permit once the funding application(s) and design plans are completed in a timeframe consistent with the enclosed timeline.

If more information is needed, please contact me at (501) 504-2455 ext. 102 or by e-mail at tfoster@ce-associates.biz.

Sincerely,
Civil Engineering Associates, LLC



Trey Foster, P.E.
Project Engineer

Enclosure(s)

City of Flippin, AR
Timeline for Implementation of WWTP & Collection System Rehabilitation

Determine Needs & Scope of Work	November 2018
Complete Cleaning & Televising of Collection System	December 2018
Receive Report from ARWA for Collection System Rehabilitation	December 2018
Prepare Preliminary Engineering Report for Submittal to WWAC	January 2019
Receive WWAC Funding Recommendation	February 2019
Prepare Funding Application for USDA	March 2019
Receive Terms of Funding	May 2019
Begin Design of Approved Scope of Work & Funding Application	May 2019
Submit Final Design Plans and Specifications to Owner for Approval	September 2019
Prepare Owner Requested Revisions	October 2019
Submit Approved Plans to ADH, ADEQ, & Funding Agency for Approval	October 2019
Receive ADH & Funding Agency Approval	November 2019
Receive ADEQ Approval	February 2020
Advertise for Bids	February 2020
Receive Construction Bids	March 2020
Award Project & Hold Preconstruction Meeting	April 2020
Begin Construction	May 2020
End Construction	December 2020
Prepare As-Built Drawings	January 2021
Submit Letter of Compliance to ADEQ	February 2021