



2114 East Matthews Ave.
Jonesboro, AR 72401
870-972-5316
Fax 870-932-0432

MEMO

To: ADEQ
Enforcement Division – Water
Attn: Layne Pemberton
5301 Northshore Drive
North Little Rock, AR 72118

From: Civil Engineering Associates, LLC
515 Oak Street, Suite D
Conway, AR 72033

Re: City of Flippin, AR
AR 0021717, AFIN 45-00021
Corrective Action Plan Update

Date: November 14, 2017

This memo serves as the monthly update per the requirement for October 2017 for the CAP. As noted since May 2017, no violations have been reported. We have reviewed the information provided by the City to ADEQ concerning the CAP. After meeting with the City staff, we developed a preliminary engineering report concerning the issues at the plant. This report was submitted and approved through WWAC this last month. A copy of the WWAC letter is provided for your review. The details for this report indicate an expansion of the plant will be needed for a 20 year planning period with upgrades throughout the facility. The next step in that process is funding application to public entities since the City does not have the revenue or reserves to fund the improvements. As with any public funding, the length of time is an issue. It is anticipated funding for this plant project would not be obtained until the middle of 2018 with construction of the improvements into 2019.

The City as noted in the CAP has been attempting to obtain funding for additional inspection of the collection system. The existing work performed through the smoke testing in conjunction with Arkansas Rural Water Association indicated the existing system needed more detailed inspection of the lines and manholes. This funding application was approved by ANRC with the application being presented to the City Council for their review this month. Arkansas Rural Water Association has provided a timeline to the City to complete the inspection work which is anticipated to take 4 months. This inspection work would lead to a detailed report on all issues and a funding application to be submitted in 2018.

As part of the CAP, the City with Arkansas Rural Water Association assistance repaired the openings found in the sewer collection system. The City informed all individual property owners of the issues found on their property. These openings were repaired within the 30 day window provided by the City. All main line leaks located during the smoke testing were repaired by City staff.

Some of the issues in the CAP are related to operational requirements. These issues have been resolved with the assistance of Arkansas Rural Water Association. The issue of excess infiltration/inflow is an ongoing concern of the City. It was noted the City's existing equalization basin has a nonfunctioning valve for discharge back into the lift station to release flow during periods of low flow. The City has obtained a pump to provide a method to discharge water back into the plant during low flow events to allow for more storage during rainfall events. The City staff indicated two bypass events had occurred this year. An explanation of the events to Civil Engineering Associates provided that due to plugging of their sand filters the City placed this unit out of service for an extended period after treatment through the oxidation ditch and clarifiers has occurred. All bypass flow was disinfected and sent through post aeration chamber prior to discharge. The plant is running the clarifiers in serial operation at this time. We are reviewing the design parameters to determine if parallel operation would allow for any increase in flow through those units. The clarifiers do limit treatment options to the City. The City staff also does not waste on a daily basis but only on the weekdays. We have requested that wasting be on a daily basis to the digester and sludge drying beds, as possible.

As part of the review, the information provided in the CAP indicate a December 31st, 2017 deadline for compliance with the permit. This date is not listed in the May15th or May25th information provided by Flippin. We are unsure where this date originated. A timeline or milestone schedule was not available. We would request to amend the CAP to include a new timeline based on the current funding issues. The City has maintained compliance with their permit since the CAP as they work through the funding and other issues presented.

If you need additional information, please call 501-504-2455.

Dave Fenter
WWAC Chairman
101 East Capitol Avenue, Suite 350
Little Rock, Arkansas 72201



PHONE (501) 682-0543
FAX (501) 682-0561
E-MAIL dave.fenter@arkansas.gov

State of Arkansas
WATER/WASTEWATER ADVISORY COMMITTEE

November 9, 2017

The Honorable Jerald Marberry
Mayor, City of Flippin
Post Office Box 40
Flippin, Arkansas 72634

Re: Flippin's Pre-application for Recommendation on Wastewater Funding

Dear Mayor Marberry:

On November 8th, the Water/Wastewater Advisory Committee reviewed your pre-application for funding to rehab the sewer treatment plant. The Committee recommends funding be provided by the following agencies:

1. Arkansas Natural Resources Commission (ANRC)
3. U.S. Dept. of Agriculture, Rural Development (RD)

The actual funding amounts cannot be determined at this time. The use of ANRC or RD loan funds would be up to you.

While these are not comments, the National Pollutant Discharge Elimination System (NPDES) Branch of Arkansas Department of Environmental Quality's (ADEQ) Water Division has asked that we mention the need for a Storm Water Permit for construction and a Wastewater Treatment Construction Permit. Any construction projects disturbing one (1) or more acres must have a storm water construction permit issued by ADEQ. The development of a Storm Water Pollution Prevention Plan is included as a permit requirement and must include the implementation of Best Management Practices (BMPs) during construction. These BMPs must include erosion and sediment control measures to prevent sediment from leaving the construction site.

Wastewater Treatment Construction Permits are required for the construction of any municipal and industrial treatment and collection facilities that discharge treated wastewater to a river or stream. Wastewater treatment construction permits are required for small on-site wastewater disposal systems that commonly serve developments or small areas in the treatment of domestic wastewater.

We appreciate your cooperation with this pre-application process. If you have any questions or comments, please give me a call at (501) 682-0543.

Sincerely,

A handwritten signature in cursive script that reads "David Fenter".

David Fenter, Chairman
Water/Wastewater Advisory Committee

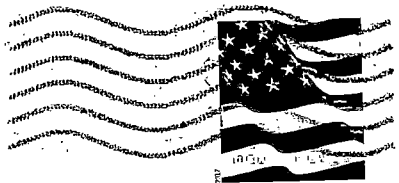
DF/vw

cc: Jeremy Stone, Civil Engineering Associates
WWAC Committee Members
Neal Hodges, USDA – RUS

515 Oak Street
Conway, AR 72033

LITTLE ROCK AR 722

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ADEQ
Enforcement Division-Water
5301 Northshore Drive
NLR, AR 72118

72118-531799

