

June 29, 2022

Mr. Joshua Hickey
Office of Water Quality
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

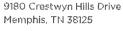
RE: UPDATE ON ACTIVITIES FOR CORRECTIVE ACTION PLAN WEST MEMPHIS UTILITIES

NPDES PERMIT NUMBER AR0022039, AFIN 18-00879

Dear Mr. Hickey:

On behalf of West Memphis Utilities (WMU), please accept the following as an update of activities undertaken since our last update in December 2021. As outlined in WMU's Amended CAP, WMU outlined a plan of action through December 2023. Listed below is a capsule summary of those activities either completed or underway since the CAP was implemented.

- 1. WMU continues to meet monthly with their CAP Working Group. Members of this group include Todd Pedersen, General Manager WMU; Ward Wimbish, Asst. General Manager, WMU; and AJ Elhaj, all engineers with WMU; Denise Bosnick, Director of Environmental Quality, WMU; and Paul Holloway, WWTP Manager, WMU. Also included in these monthly meetings as necessary are Tim Verner, P.E., and Chase Carpenter, Fisher & Arnold, and Mac Compton, P.E., RJN Group. This group directs and tracks on-going efforts by WMU staff and all outside consultants and contractors relative to efforts towards the elimination of systemwide SSOs.
- 2. Upchurch Services completed the rehabilitation of approximately two hundred sanitary manholes that were identified as needing remedial work in the previously mentioned RJN SSES Report.



- 3. WMU has entered a contract with Argo Construction for the replacement of Pump Stations 3 and 4, and a new force main. The contractor is preparing to mobilize within the next few weeks to begin construction on the new common force main. Shop drawings for pipe, fittings and Pump Station No. 4 have been submitted and approved, and the contractor expects his submittal for Pump Station No. 3 in the next 30 days. This project has a Substantial Completion date of July 1, 2023.
- 4. Since our last semiannual report in December 2021, WWTF staff has not had any reported plant bypasses. Additionally, since December 2021, there has been a total of seven reported sanitary sewer overflows, five occurred in February, and 2 occurred in April.
- 5. Plans and specifications for the expansion of the WWTF are currently under review by ADH and ADEQ and responding to reviewer comments as they are received from each agency. This expansion will increase the permitted flow from just above 6 MGD to 12 MGD average daily flow with a peak flow of 18 MGD. Additionally, Fisher & Arnold has submitted necessary NPDES permit modifications for this increased flow.
- 6. Between the period of November 18, 2021, and June 24, 2022, WMU has invested an additional \$163,900.00 in the planning, engineering, replacement, and/or repair of their sewer collection and treatment systems. Of this total, \$101,264.00 has been for actual rehabilitation and/or rehabilitation of existing infrastructure. The remainder has been for advance planning studies and/or design of sewer infrastructure repairs, rehabilitation, or replacement.
- 7. WMU located and raised the top elevation of five manholes along a large drainage course near the intersection of Rice and Auburn Streets. These manhole tops are now well above the water surface elevation expected during a 25-year storm event, thereby lessening the risk of inflow sources during extreme storm events.

- 8. WMU has issued a Notice to Proceed for the repair of forty-four-point repairs to existing sewer mains and laterals with an expected completion date of December 2022. The completion of these repairs will then allow WMU to move forward with the commencement of CIPP of existing gravity sewer mains identified in previous SSES Reports prepared by RJN. This CIPP work is planned to commence first quarter 2023.
- 9. WMU is planning to commence 60 to 75 days of post-rehabilitation flow monitoring in first quarter 2023 to begin assessing the positive impact past rehabilitation efforts have been.

Hopefully, this summary of activities is useful to you and your staff and demonstrates the commitment of WMU to eliminate SSOs in their collection system and WWTP bypasses. If you require any additional information, please do not hesitate to contact me at this office.

Sincerely,

FISHER & ARNOLD, INC.

Tim Verner, P.E.

Senior Vice-President

TV/tv

Enclosures

Cc: Todd Pedersen, General Manager, WMU



604 East Cooper Phone: 870-735-3355 West Memphis, AR 72301

CAP MEETING (January 10, 2022)

Attendees Onsite:

- WMUC- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj, Denise Bosnick
- F&A- Jeff Old, Tim Verner

Project Members:

- W.M.U.C.- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj
- F&A- Tim Verner, Jeff Old
- RJN- Mac Compton, Stephen Jeffus, Colton Bryant

The Following Actions that were discussed:

A. REVIEW MEETING MINUTES

• Everyone agreed to last meeting notes, and no comments were made.

B. COMMON FORCE MAIN EXTENSION & PUMP STATIONS

- Old stated that FA received a quote from Geotechnology for \$5500 to do the soil bore. WMU Approved the amount.
- Verner stated that FA have chosen 3 locations (Hwy 70, Rich Road, Barton Ave) to do soil bore and will be scheduled by the end of the month.
- Old requested a GIS file with property lines for the common force main. Sent to Jeff Old on January 21, 2021.
- Verner suggested that the common force bid tabulation should include a separate bid item for pipe material. Verner will further investigate.
- Pedersen requested that open bids should be scheduled for the beginning of March 2022.
- Old suggested that advertisement of legal notice should run twice in February 2022 (1st and 2nd week of February).
- Old suggested the pre-bid meeting to be scheduled for February 16, 2022.
 Confirmed And Verner requested the pre-bid meeting to be mandatory.
- Wimbish requested that WMU be on-site when Geotechnology do the soil boring.

C. 2020 SANITARY SEWER MANHOLE REHABILIATION

• Elhaj stated that Upchurch services has completed the additional work and the original contract.

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D. WWTF MODIFICATION

- Verner stated that FA are still working on the foundation for the clarifiers.
- Verner stated that FA submitted permit applications and plans last week. Now waiting for any comments from ADEQ.
- Verner stated that FA next steps is to start looking at bid form with vendors and contractors.
- Verner suggested to hire general contractor for the WWTF Modification.

E. NEW BUSINESS

- POINT REPAIR
- CIPP PROJECT
- 2022 FLOW MONITORING

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CAP MEETING (February 16, 2022)

Attendees Onsite:

- WMUC- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj, Denise Bosnick
- F&A- Tim Verner

Project Members:

- W.M.U.C.- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj
- F&A- Tim Verner, Jeff Old
- RJN- Mac Compton, Stephen Jeffus, Colton Bryant

The Following Actions that were discussed:

A. REVIEW MEETING MINUTES

• Everyone agreed to last meeting notes, and no comments were made.

B. COMMON FORCE MAIN EXTENSION & PUMP STATIONS

- Elhaj stated that the pre-bid meeting is scheduled for today (February 16, 2022) and the opening of bids is scheduled for March 2, 2022. The opening bids will be added to the city council agenda.
- Verner suggested having two options of pipe for the contractor to choose, but the bore will still use HDEP.
- Verner stated that FA will receive the soil boring by the end of the week and will included in the first addendum.

C. WWTF MODIFICATION

- Verner requested that the proof of publication be submitted to ADEQ.
- Pedersen stated that the Arkansas Democrats newspaper had notified ADEQ, which was published for public notice (February 13, 2022). The public notice lasts for 30 days.
- Holloway requested that a remote output screen in the return slug room will be needed.
- Verner stated that FA will meet with the structural engineers to review the clarifiers.

D. 2022 FLOW MONITORING

• Elhaj stated that RJN will have proposal by the end of week.



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E. 2022 SEWER MAIN REHAB.

- Elhaj stated that WMU is gathering all the point repairs from the sanitary sewer evolution studies and will bid the project out in the next month.
- Elhaj stated that once the sewer point repairs are completed, WMU will start looking at doing trenchless method of repair such as CIPP (Cured in Place Pipe).



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CAP MEETING (March 16, 2022)

Attendees Onsite:

- WMUC- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj, Denise Bosnick
- **F&A-** Tim Verner, Chase Carpenter

Project Members:

- W.M.U.C.- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj
- **F&A-** Tim Verner, Chase Carpenter
- RJN- Mac Compton, Stephen Jeffus, Colton Bryant

The Following Actions that were discussed:

A. REVIEW MEETING MINUTES

Everyone agreed to the last meeting notes, with the correction of a typo.

B. COMMON FORCE MAIN EXTENSION & PUMP STATIONS

- Verner stated that Argo Construction and Chris-Hill Construction showed interest to bid for the common force main project. They are 8 plan holders.
- Verner stated that opening bids are scheduled for today March 16, 2022, at 10 am.

C. WWTF MODIFICATION

- Verner stated there were two comments that ADEQ had, and they will be addressed.
- Verner stated that the proof of publication has been submitted to ADEQ.
 The 30-day comment period has now ended on the permit modification and construction permit.

D. 2022 FLOW MONITORING

Pedersen suggested reducing some of the flow meters from RJN proposal.
 WMU will review the proposal internally and then schedule a meeting with RJN.

E. 2022 SEWER MAIN REHAB.

 Elhaj stated that WMU is gathering all the point repairs from the sanitary sewer evolution studies and will bid the project out the beginning of May.

NEW BUSINESS: 5 SEWER MANHOLES REBUILT AT AUBURN STREET



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CAP MEETING (April 13, 2022)

Attendees Onsite:

- WMUC- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj, Denise Bosnick
- F&A- Tim Verner

Conference Call:

Mac Compton

Project Members:

- W.M.U.C.- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj
- F&A- Tim Verner, Chase Carpenter
- RJN- Mac Compton, Stephen Jeffus, Colton Bryant

The Following Actions were discussed:

A. REVIEW MEETING MINUTES

Everyone agreed to the last meeting minutes.

B. COMMON FORCE MAIN EXTENSION & PUMP STATIONS

- Verner stated that the contract with performance and payment bond is ready for the city attorney to review and have the mayor sign.
- Pedersen proposed the pre-construction meeting on April 20, 2022, at 9 am.
 Verner will verify this with Argo Construction.
- Wimbish stated the easement has been signed and notarized and is ready to be picked up.

C. WWTF MODIFICATION

- Verner stated there were two comments on the construction permit that ADEQ had, and they will be addressed by end of today.
- Verner stated that the WWTF modification permit can take up to 6 months.
- Verner stated that St. Francis Levee District has given permission to do the soil boring at WWTF. The levee district did request that Geotechnology needs to wait until the river level drops.

D. 2022 FLOW MONITORING

 Pedersen suggested reducing some of the flow meters from the RJN proposal and adding a bidirectional flow meter. WMU will review the proposal next week.



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E. 2022 SEWER MAIN REHAB.

- Elhaj stated that the 2022 sewer point repair project will be advertised in the evening times this week.
- Elhaj stated that bid openings for the 2022 sewer point repairs is scheduled for May 4, 2022.
- Elhaj stated that the sewer point repairs will include 42-point repairs.

F. 5 SEWER MANHOLES REBUILT AT AUBURN STREET

- Elhaj stated that the 5 manholes have been ordered and work will start next week. The 5 manholes are being replaced due to high inflow from the tenmile bayou.
- WMU has also identified some critical I/I issue near the ten-mile bayou, the work includes replacing the manhole cone and Ditch crossing replacement with 20 ft ductile iron pipe.



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CAP MEETING (May 11, 2022)

Attendees Onsite:

- WMUC- Todd Pedersen, Paul Holloway, AJ Elhaj, Denise Bosnick
- **F&A** Tim Verner
- RJN- Mac Compton

Project Members:

- W.M.U.C.- Todd Pedersen, Ward Wimbish, Paul Holloway, AJ Elhaj
- **F&A-** Tim Verner, Chase Carpenter
- RJN- Mac Compton, Stephen Jeffus, Colton Bryant

The Following Actions were discussed:

A. REVIEW MEETING MINUTES

Everyone agreed to the last meeting minutes.

B. COMMON FORCE MAIN EXTENSION & PUMP STATIONS

- Elhaj stated that FA and WMU had a pre-construction meeting with Argo construction on May 20, 2022 and issued a notice to proceed for July 1, 2022.
- Verner stated that the contractor has submitted submittals, and the piping and pipe fitting submittals have been reviewed. Pump station # 4 submittal has been submitted.
- Verner still waiting on Argo construction for Billing material and invoices for the pipe and pipe fittings.
- Pedersen requested that the pipe and pipe fitting need to be ordered.
- Elhaj stated that pump stations 3 and 4 need to have an emergency generator port like pump station 9.
- Elhaj stated that the deed of the easement has been signed and recorded at the circuit court in Marion, AR.

C. WWTF MODIFICATION

- Verner stated that FA is still waiting on ADEQ to come back to schedule an internal meeting on what the permit going to be before they send it to EPA.
- Verner stated that FA has responded to the health department on their comments.



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D. 2022 FLOW MONITORING

• Compton stated that RJN will revise the proposal to a two-phase project which includes the new sewer force main from pump stations 3 and 4.

E. 2022 SEWER MAIN REHAB.

- Elhaj stated that the 2022 sewer point repairs project bid opening was on May 4, 2022.
- Elhaj stated that West Memphis City Council has approved the bid opening and was referred to the West Memphis Utility Commission for approval on May 5, 2022.

F. 5 SEWER MANHOLES REBUILT AT AUBURN STREET

 Elhaj stated that the 5 manholes have been completed in the first week of May. The 5 manholes are being replaced due to high inflow from the tenmile bayou.