

February 7, 2014

Via Electronic Delivery

Ms. Jacqueline Trotta
Enforcement Analyst
Water Division / NPDES Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: NPDES Permit No. AR0022403, AFIN 04-00154
Sanitary Sewer Overflows

Dear Ms. Trotta:

The purpose of this correspondence is to provide additional information regarding sanitary sewer overflows reported by the City of Bentonville as requested in your letter dated January 2, 2014. Per our conversation on January 23, 2014 regarding said request, the main concern is for the City of Bentonville to provide a time frame for the South Lift Station Force Main Project. This is a large project consisting of approximately 3 miles of 16-inch force main. This project has been delayed in order to coordinate placement of the force main and associated easements with the Arkansas State Highway 12 widening project and associated utility relocations. The City does not currently have a firm schedule for the project; however, our plan is outlined as follows:

- The project design has been completed and we are currently in the easement acquisition phase. Easement acquisition is anticipated to be complete by the end of April 2014.
- Once all easements have been acquired, bid documents will be prepared. Advertisement for bids is expected to occur during the month of May with bid opening in late May or early June 2014.
- Bid award should be recommended to City Council for consideration in June 2014. Given the City's Council schedule, this would most likely be late June.
- Typically, projects start approximately 30 days after City Council award to allow for contract signing and pre-construction meetings. Thus construction should begin in late July 2014.
- Construction time is estimated at 180 calendar days from the date of Notice to Proceed which will place completion of the project in late January 2015. Project time is subject to change orders including weather delays.

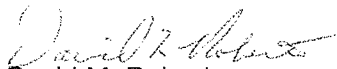
Since the project schedule is a moving target due to the nature of the easement acquisition process, general project coordination, and weather impacts, I propose that the City of Bentonville notify you of benchmark dates such as bid date, City Council consideration, construction start/end dates as soon as they are firm. In addition, Bentonville can provide periodic updates, such as quarterly updates, throughout the project.

The City takes overflows and inflow and infiltration (I&I) related issues very seriously and is very active in finding and correcting issues that cause such overflow events. Issues such as grease clogs, line blockages, line breaks, and equipment failures are corrected as soon as they are known. Capacity, aging infrastructure, and I&I issues are long term issues in which the City is actively engaged. The City has replaced, with force account labor, more than 5 miles of old, clay lines in older parts of the City within the last five years and plans to continue this effort in the years to come with projects already identified. The City has also included large projects to replace aging clay interceptor lines in the 5-year capital improvement plan. Redirecting 1.5 million gallons per day (MGD) to NACA relieved capacity issues thus greatly reducing the volume and duration of overflows at our McKissic Creek site. The South Lift Station Force Main upgrade project will greatly reduce the overflow potential at the SE Walton Blvd. site as it will correct the existing force main capacity issue. In addition, the City remains aggressive on camera inspections of its entire system, identifying and addressing I&I and blockage issues which have potential to cause overflows. Our inspection program includes routine cleaning as well. Our pretreatment and grease abatement programs proactively addresses fats, oils, and grease in our system to reduce blockages and overflows. Addressing such issues is an ongoing struggle, but the City remains committed to improving its system and working toward eliminating overflows associated with numerous causes. In addition to South Lift Station Force Main Project updates, the City is also willing to discuss our other projects and programs periodically to keep ADEQ informed of our plans and progress.

Please feel free to contact me at 479-271-3160 or mroberts@bentonvillear.com if you have any questions or wish to further discuss any items.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Respectfully,



David M. Roberts
Wastewater Utilities Manager

Cc: Honorable Bob McCaslin, Mayor, City of Bentonville
Mr. Preston Newbill, City of Bentonville Water Utilities Department Manager
Mr. Mike Bender, City of Bentonville Public Works Director
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