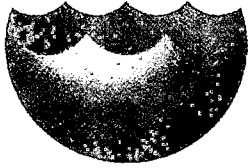


Doing Our Best

MALVERN WATER WORKS



for You.

506 Overman Street
P.O. Box 638
Malvern, Arkansas 72104

501 332-3634, Phone
501 332-5730, Facsimile

January 14, 2019

Bailey Taylor
Enforcement Coordinator
ADEQ
5301 Northshore Drive
North Little Rock, AR. 72218-5317

**RE: AFIN: 30-0040, NPDES Permit No.: AR0034126, IR: December 27, 2018
Corrective Action Plan Request, CL: 9489 0090 0027 6022 2319 92**

First I would like to start by saying that we, the City of Malvern and the Malvern Water Works are proactive. The Wastewater Division's main goal is stopping the on going problems of I & I and overflows within our sewer system. With the survey, it will give us the outline of what needs to be addressed in fixing our aged system.

In the summer of 2018, as noted in last year's letter report we started the survey of our collection system through Crist Engineering. In August of 2018, the flow monitoring part of the survey was completed. Now they are conducting manhole inspections which includes GPS for our future revamped map of the sewer system. Then with smoke testing and CCTV coming soon thereafter. Once the survey is complete and we receive our final report, we can then show you a true action plan. Please note that our action plan will be of the over all picture of our sewer system which will cover plant upgrades, plant outfall upgrades, sewer line repairs, extensions, upsizing, and or replacements which will also cover the areas of our repetitious overflow areas.

Carl Wheatley

Wastewater Superintendent
City of Malvern
P.O. Box 638
Malvern, AR. 72104

A Municipal Water & Sewer System

| | | | | | | | | | | | | | | | | | | |
|--|--|--|--|--|--|--|---|---|---|---|---|---|---|---|---|---|---|--|
| | | | | | | | 8 | 8 | 7 | 9 | 7 | 7 | 9 | 9 | 9 | 9 | 9 | |
|--|--|--|--|--|--|--|---|---|---|---|---|---|---|---|---|---|---|--|

| LOCATION | UPSTREAM MH | MH RODDED FROM | FT RODDED | DATE |
|--|-------------|----------------|-----------|------------|
| INTERSECTION OF COLLIE/DIVISION | 604 | 580 | 900 | 9/8/2016 |
| INTERSECTION OF COLLIE/DIVISION | 604 | 580 | 900 | 6/19/2017 |
| INTERSECTION OF SULLENBERGER/WILSON | 468 | 466 | 680 | 10/11/2016 |
| INTERSECTION OF JEFFERSON/ROBT E LEE | 451 | 461 | 800 | 4/27/2017 |
| INTERSECTION OF LAUREL/DAVIS | 154,155,157 | 156 | 800 | 10/3/2016 |
| INTERSECTION OF LAUREL/DAVIS | 154,155,157 | 156 | 600 | 11/16/2017 |
| INTERSECTION OF LAUREL/DAVIS | 154,155,157 | 158 | 710 | 11/16/2017 |
| INTERSECTION OF LAUREL/DAVIS | 154 | 155 | 400 | 3/20/2018 |
| INTERSECTION OF LAUREL/DAVIS | 154 | 155 | 400 | 10/15/2018 |
| 1910 SULTON (OLD MALVERN JR HIGH) | 769 | 770 | 450 | 9/29/2017 |
| 1910 SULTON (OLD MALVERN JR HIGH) | 769 | 770 | 800 | 2/2/2018 |
| SECTION LINE BETWEEN WHITEHOUSE/SHEPPARD | 371,421 | 391 | 400 | 2/26/2018 |
| STADIUM DR | 335 | 1037 | 600 | 10/10/2018 |

| LOCATIONS | MH# | REASON | FREQ |
|---|-----|---------------|------|
| NEAR 1331 MLK (CITY PARK LIFT STATION) {SEE NOTE 1} | N/A | EQUIP FAILURE | 4 |
| INTERSECTION OF LAUREL/DAVIS | 154 | SURCHARGE | 12 |
| INTERSECTION OF LAUREL/DAVIS | 155 | SURCHARGE | 13 |
| INTERSECTION OF LAUREL/DAVIS | 155 | DEBRIS | 1 |
| 1735 SULLENBERGER | 879 | GREASE | 1 |
| WALCO RD | 11 | SURCHARGE | 1 |
| SECTION LINE BETWEEN WHITEHOUSE/SHEPPARD | 371 | SURCHARGE | 4 |
| INTERSECTION OF DIVISION/COLLIE | 604 | GREASE | 2 |
| PRIVATE LIFT STATION (1601 MLK) | N/A | EQUIP FAILURE | 1 |
| 507 N. BANKS | 383 | GREASE | 1 |
| 501 REYBURN (SAND) RD | 941 | GREASE | 1 |
| 1910 MLK (BEHIND WAL MART) | N/A | PT REPAIR | 1 |
| NEAR 913 WALCO RD PAST KELLY | 69 | SURCHARGE | 3 |
| INTERSECTION OF LAUREL/DAVIS | 157 | SURCHARGE | 1 |
| 1910 SULTON (OLD MALVERN JR HIGH) {SEE NOTE 2} | 769 | GREASE | 1 |
| NEAR INTERSECTION OF PINE BLUFF/MANN | N/A | GREASE | 1 |
| INTERSECTION OF SULLENBERGER/TOLER | 406 | SURCHARGE | 4 |
| INTERSECTION OF SULLENBERGER/TOLER {SEE NOTE 3} | 406 | PT REPAIR | 1 |

| LOCATIONS | MH# | REASON | FREQ |
|--|------|---------------|------|
| INTERSECTION OF SULLENBERGER/CHERRY LANE | 408 | SURCHARGE | 3 |
| INTERSECTION OF SULLENBERGER/WILSON | 468 | SURCHARGE | 1 |
| INTERSECTION OF JEFFERSON/ROBT E LEE | 451 | SURCHARGE | 2 |
| 223 WALCO RD | 9 | SURCHARGE | 2 |
| INTERSECTION OF REYBURN (SAND) RD/MT WILLOW | 942 | GREASE | 1 |
| 2219 SHADY LANE | 1059 | GREASE | 1 |
| BETWEEN MH 760 & 761 IN WOODS | N/A | GREASE | 1 |
| STADIUM DR | 335 | GREASE | 1 |
| NEAR 1840 W MOLINE (LIFT STATION) | N/A | EQUIP FAILURE | 1 |
| WALCO RD | 70 | SURCHARGE | 1 |
| SECTION LINE BEHIND DOSS GARAGE (1332 E PAGE) {SEE NOTE 4} | 421 | GREASE | 1 |

1) 11/16 - WE REPLACED CITY PARK PUMP STATION COMPLETELY

2) 2/1/18 - CLEANED ROOTS OUT OF MH769 & 770

4) 3/6/18 - REPLACED 10' OF BROKEN MAIN DOWNSTREAM FROM MH406

3) 4/17/18 - REPLACED 20' OF BROKEN MAIN DOWNSTREAM FROM MH421

Malvern Wastewater

2018 ADEQ Year End Report

Wastewater Collection / WW Plant

| Item | Year to Date |
|---|--------------|
| Plant Maintenance | 10 |
| Lift Station Pump Maintenance | 6 |
| Plant Outside Service Projects | 5 |
| Lift Station Service | 9 |
| Residential Gravity Service - New | 9 |
| Residential Gravity Service - Renewal | 12 |
| Point Repairs - Main Line | 23 |
| Point Repairs - Force Main | 1 |
| Extension - Gravity Mains | 0ft |
| Extension - Force Mains | 0ft |
| Relay of Mains - All Types | 0ft |
| CCTV - Main Lines | 1,896ft |
| CCTV - Service Lines | 0ft |
| Dye Testing | 300ft |
| Smoke Testing - Mains | 0ft |
| Smoke Testing - Services | 0ft |
| De-root Main Lines | 0ft |
| Abandon Service Connections | 1 |
| Sewer FORCE Main Cleaning | 0ft |
| Sewer GRAVITY Main Cleaning | 84,460ft |
| Sewer GRAVITY Main Rodding | 6,600ft |
| Sewer Overflow Cleanup | 2 |
| Maintenance Works | 17 |
| Contracted Projects | 1 |
| Free to Customer - Back Flow 4" Preventors | 2 |
| MH - Manhole Install | 1 |
| Manhole C/O Install | 3 |
| Manhole Maintenance - Raise to grade | 0 |
| Manhole Maintenance - Raise above | 9 |
| Manhole Maintenance - Lower grade | .0 |
| Manhole Maintenance - Rehab | 7 |
| Manhole Maintenance - Repairs | 11 |
| Maintenance - MH Cleaning | 145 |
| Residential Pump Station Degreased/Cleaned | 42 |
| Residential Pump Station Installed | 2 |
| Residential Pump Diagnostic Checks | 31 |
| Residential Pump Repair | 24 |
| Residential Pump Service line installation | 30' |
| Point Repairs - Residential Pump Service line | 1 |

Wastewater Operations

| Item | Year to Date | Combined |
|----------------------------------|--------------|-------------|
| Inventory Spent - plant chemical | \$8,661.60 | |
| Inventory Spent - collection | \$17,773.80 | \$26,435.40 |
| ADEQ SSO Reports | 23 | |
| Sewer Overflows in Gallons | 4,072,200gl | |
| Work Orders Completed | 143 | |
| Non Work orders Completed | 57 | |
| TOTAL | 200 | |

ADEQ

ARKANSAS
Department of Environmental Quality

December 27, 2018

CERTIFIED LETTER: 9489 0090 0027 6022 2319 92

Honorable Brenda Weldon, Mayor
City of Malvern
P.O. Box 638
Malvern, AR 72104

email: mayor@malvernar.gov

**RE: NPDES Permit Number: AR0034126, AFIN: 30-00040
Corrective Action Plan Request**

Dear Mayor Weldon,

A review of the NPDES file for the above mentioned facility for the period of November 1, 2015 through November 30, 2018 reveals the City of Malvern has reported sixty (60) Sanitary Sewer Overflows (SSOs) totaling over 6,910,840 gallons in the thirty-six (36) month review period. SSOs are unpermitted discharges and the Department expects the City of Malvern to continue to work towards eliminating them.

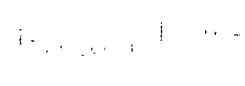
The Department requests an update on the Corrective Action Plan (CAP) dated October 22, 2014. Please include an updated milestone schedule detailing measures that are being taken or that will be taken to reduce SSOs and the date the facility expects to be in compliance.

Additionally, the Department requests a map of the reported SSO occurrences. Your response should reach the Department by **February 15, 2019**.

Any violation of your NPDES Permit is subject to enforcement action by this Department, pursuant to the Arkansas Water and Air Pollution Control Act. The regulations and your NPDES Permit require that you take all reasonable measures necessary to eliminate or prevent the occurrence of violations.

Should you have any questions concerning the above referenced compliance issues, please feel free to contact me at 501-682-0639, or you may e-mail me at bailey.taylor@adeq.state.ar.us.

Sincerely,


Bailey Taylor
Enforcement Coordinator
Office of Water Quality

cc: Carl Wheatley, Supervisor, Malvern Water Works (cwheatley@malvernar.gov)

MAP(S)/PLAN(S) SCANNED IN
SEPARATE FILE

Wastewater Division
P.O.Box 638
Malvern, AR 72104

CERTIFIED MAIL™



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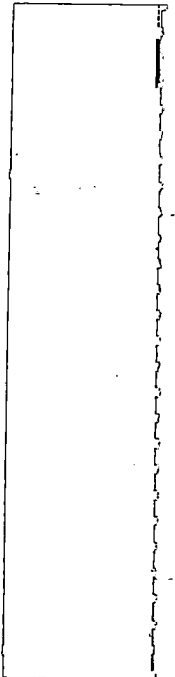


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72104
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R2307M152535-13



ADEQ Att: *Bailey Taylor*
WATER DIVISION-ENFORCEMENT BRANCH
5301 NORTSHORE DRIVE
NORTH LITTLE ROCK, AR 72118-5317

