



October 9, 2024

VIA E-MAIL: water-enforcement@adeq.state.ar.us

Arkansas Department of Energy and Environment
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: City of Malvern, Arkansas
NPDES Permit No. AR0034126, AFIN 30-00040
CAO LIS 24-045
SSO Progress Report & SECAP/CIP Delivery

Dear Sir or Madam:

In accordance with the requirements of the Consent Administrative Order (CAO) LIS No. 24-045 dated April 9, 2024, the City of Malvern submits herewith the Sanitary Sewer Evaluation Study (SSES) and Capital Improvement Plan (CIP) developed in concert with the System Evaluation and Capacity Assurance Plan (SECAP).

The following items listed in **Table 1.0** are a brief synopsis of progress regarding the CAO.

Item No.	Begin	End	Description
1	9/30/22	11/28/22	Engagement of Crist Engineers to develop Corrective Action Plan
2	12/13/22	12/20/22	Malvern self-performed 213 linear feet of 6" PVC open cut sewer line replacement between manhole 0154 and 0155 at the intersection of Laurel and Davis
3	4/5/23	6/5/23	Temporary flow meter installation and data collection of nine flow meters for 60 days of continuous flow monitoring throughout the collection system
4	4/5/23	6/5/23	Installation and data acquisition of five rainfall gauges to obtain continuous rainfall interval intensity
5	4/5/23	7/20/23	Field investigations including 107 manhole inspections, 197,407 linear feet of collection system smoke testing, 21 dye tests, and 27,224 linear feet of CCTV sewer main inspection
6	5/31/23	6/30/24	Development of a comprehensive wastewater collection system hydraulic model that reasonably predicts the performance of the existing sanitary sewer system and provides a platform for analyzing existing system performance and anticipated capital improvements to project additional capacity
7	3/1/24	10/7/24	Conducted a water and sewer rate study to evaluate available funding sources and identify future rates necessary to complete the CIP improvements and operate and maintain the collection system to prevent future SSOs

8	4/9/24	7/30/24	Elimination of the overflow pipe at manhole 0086 located at the intersection of Kelly St and Morzett St
9	6/30/24	9/30/24	Analyzed the existing collection system and force main system capacity & evaluated capital improvement options to increase overall system capacity
10	3/1/24	10/8/24	Developed a SSES, SECAP, CIP, and the identified projects to increase system capacity
11	10/9/24	N/A	Delivery of SSES, SECAP, CIP & SSO Progress Report to DEQ

Table 1.0 – CAO Progress Synopsis

To complete the near-term work proposed in the CIP, the City of Malvern applied for funding through various programs administered by the Natural Resources Division of the Arkansas Department of Agriculture (ANRD). The city was awarded grants through the American Rescue Plan Act (ARPA) and the Sewer Overflow and Stormwater Reuse Municipal Grant (OSG) Program. These award letters are included in this progress report.

Pending agency review and approval of the reports and information submitted herein, the City of Malvern is, from a project prioritization and funding standpoint, in an excellent position to make substantial progress towards eliminating SSOs and achieving compliance with the Permit and the requirements of the CAO. Over the next two months, Crist Engineers and the City of Malvern will be developing a schedule of improvements in concert with the required milestone schedule and final date of compliance and submit to your office for review and approval on or before December 9, 2024.

Please let us know if you have any questions or comments. We look forward to your review.

Sincerely,
Crist Engineers, Inc.



Mason Allen, P.E.

Enclosures: CIP, October 2024
SECAP, October 2024
SSES, October 2024
ARPA Award Letter, 7/17/2024
OSG Award Letter, 6/12/2024

Cc: Honorable Brenda Weldon, Mayor, City of Malvern
David Coston, General Manager, Malvern Water Works
Carl Wheatley, Superintendent, Malvern Water Works
Leslie Allen-Daniel, DEQ
Richard Healey, DEQ
Alan Anderson, DEQ