



January 13, 2023

VIA E-MAIL: leslie.allen-daniel@adeq.state.ar.us

Ms. Leslie Allen-Daniel
Enforcement Coordinator, DEQ, OWQ
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: City of Malvern, Arkansas
NPDES Permit No. AR0034126, AFIN 30-00040
SSOs: Manholes #154 & #155 at Laurel and Davis – Request for CAP
Progress Report 01

Dear Ms. Allen-Daniel:

Progress Report 01 Summary is provided in Table 1 below.

Item No.	Corrective Action Description	Target Initiation Date	Target Completion Date	Status
1.	Flow Monitoring and Rainfall Monitoring	March 31, 2023	July 31, 2023	Yet to Commence
2.	CCTV Inspection	May 31, 2023	August 31, 2023	Yet to Commence
3.	Smoke Testing	July 1, 2023	September 30, 2023	Yet to Commence
4.	Capital Improvement Plan and Schedule of Improvements	September 1, 2023	December 31, 2023	Yet to Commence

Table 1: Milestone Schedule Status

In December 2022 Malvern Water Works self-performed an open cut replacement of the 6" clay sewer main that connects MH 154 and MH 155 with new 6" SDR-26 PVC. This was in response to their inability to inspect the segment by CCTV due to offset joints and root intrusion. During the replacement they located three (3) inactive sewer service lines and filled them with flowable fill before abandoning them. It was also discovered that stormwater collecting in the nearby curb inlet was flowing into the old sewer main through a large pipe fracture.

In total, four (4) sources of inflow and infiltration (I&I) into this critical pipe segment were identified and eliminated. After a significant wet weather event post open cut replacement, Malvern noticed that the water level in MH 155 was lower now than it had been during past wet weather events of similar intensity, indicating that the self-performed pipe replacement is already helping to reduce and eventually eliminate sanitary sewer overflows (SSOs) at MH 154 and MH 155.

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In January 2023 Crist Engineers surveyed MH 154, MH 155, and 19 additional manholes upstream and downstream of the Laurel and Davis intersection. Information gathered from this survey includes MH rim elevations, sewer invert elevations, and sewer pipe diameters. This information will allow us to build a hydraulic profile of the area that will aid in verifying pipe capacities, segment slopes, and potential bottlenecks that may also be contributing to the Laurel and Davis SSOs.

Over the next several weeks, the City of Malvern plans to engage Crist Engineers and RJN Group to begin planning for the proposed corrective action work as shown in Table 1. The milestone schedule submitted in the original CAP will be updated as corrective actions are completed.

Should you have any questions or concerns, please don't hesitate to reach out anytime at 501.993.2922.

Sincerely,
Crist Engineers, Inc.



Matthew D. Dunn, P.E.
President

Cc: Honorable Brenda Weldon, Mayor, City of Malvern
David Coston, General Manager, Malvern Water Works
Carl Wheatley, Superintendent, Malvern Water Works
Richard Healey, Enforcement Branch Manager, DEQ, OWQ