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October 22, 2014

Gina Porter  
ADEQ / Enforcement Analyst  
Water Division, Enforcement Branch  
5301 Northshore Drive  
North Little, Rock, AR. 72218-5317

RE: AFIN: 30-0040

NPDES Permit No.: AR0034126

IR: October 3, 2014

Dear Gina Porter:

I would like to start out saying that our intentions as a permit facility are to never violate any of our NPDES permits. Unfortunately, there will be situations beyond our control that will cause overflows within our sewer system. Our collection system is made up of over 75 miles of gravity sewer main, 1100 plus manholes, 10,000 plus feet of force main, 55 plus residential pumps and service lines, and 7 major lift stations. Even though it is an old system we thrive every day to make it a top quality collection system.

In this report, I will cover what we are doing to prevent unpermitted overflows and how we maintain our sewer system. I am including a spread sheet that shows 6 areas that significantly affected the overflows during the three year reporting period. The spread sheet will also reflect the progress of eliminating sewer overflow. I have also included year-end reports from 2008 to present that will show what we have done to work toward getting overflows stopped.

Sincerely,

A handwritten signature in cursive script that reads "Carl Wheatley".

Carl Wheatley  
Wastewater Superintendent

## **Commercial Grease/Sand Traps**

FOG management is an ongoing program here in Malvern. We do semi-annual inspections of all commercial properties, schools, and churches that prepare foods for the purpose to sell. We collect copies of all maintenance reports that are performed by the property owner. Each year our pre-treatment person attends the Pretreatment Workshop which is put on by EPA District 6.

## **Cleaning of Sewer Mains**

Residential grease is always our main problem with sewer overflows. Our sewer system is broken into five basins, each having its own trunk main. Our goal each year is to go through each basin and clean the sewer mains at least once. The hot spots are cleaned more frequent. At each setup for line cleaning, we clean the manholes too. Cleaning lowers our overflows by keeping the trough free of any restrictions. By looking at our year end reports you can see that frequent cleaning is lowering the customer calls due to clogged sewers and our overflows are going down. Our department also spends thousands of dollars on degreasers and enzymes for the prevention of grease build up.

## **Pumps/Lift Station Maintenance**

In the past 3 years we have revamped all of our lift stations except for one. That one is in future plans to be revamped as well. Two of our lift stations are equipped with SCADA systems that send information directly to our wastewater plant. We conduct monthly maintenance and daily inspections of our lift stations along with run times.

## **Overflows**

All overflows are investigated by sending out our CCTV van. If we come across an issue that is in need of repair, we will promptly fix it and the work order is labeled as a POINT REPAIR.

EXAMPLE: There was one sewer main that, over time, seemed to have more problems than from the typical residential debris or grease issues. A major defect was discovered after CCTV was conducted of the main line. A house owner had issues with their foundation so they had an out of state company come and install lifters (foundation jacks). CCTV showed that one of the lifters was installed right through our sewer main. After the problem was corrected, the sewer overflow from that location stopped.

## **Private System**

We have one private lift station that we deal with on occasion because of poor equipment upkeep. The owner is located in Florida. In the past, we have given the owner options of how to fix their problem with the lift station. We have recommended companies that could revamp the lift station and what we would require if we were to take their system over. The problem we have of shutting the water off to the private system, as enforcement, would affect eighteen businesses. When the option of shutting off the water supply is discussed, one of the eighteen businesses, SYKES, an ATT call center, will actually pay for the pumping of the wet well until the owner makes all needed repairs because, they cannot afford to be shut down. We are working with SYKES to put pressure on the owner to fix the lift station through options that have been presented.

## **Future Plans**

- 1) Our main objective is to continue what we are doing now to maintain our sewer system without an over indulgence of non-permitted discharges. Based on the enclosed year by year spread sheet, it does show evidence of a decline in sewer reported overflows.
- 2) Push for updates to the city ordinances that pertain to wastewater, especially laws that pertain to enforcement.
- 3) Have engineering look into updating the city park lift station.
- 4) Educate the public about GREASE and what it will do to a sewer system and the Do's and Don'ts of grease.
- 5) Educate by means of updates to our company website, newspaper ads, and pamphlet inserts.
- 6) FOG! Continuation of our grease/sand trap program.

## WASTEWATER YEAR END REPORT 2008

Service (renewal) -----	10
Point repair (main line) -----	9 repairs
Point repair (service line) -----	0
Point repair (force main) -----	3 repairs
Manhole inspections -----	26
Main cleaning -----	100,540'
Main stoppage cleaning -----	53,490'
CCTV (main lines) -----	315'
CCTV (service lines) -----	60'
Main line relay -----	330'
Dye Testing -----	0
De-Root Main lines -----	0
Smoke testing (main line) -----	0
Smoke testing (service) -----	0
Manhole Repair/Rehab/Replace/etc. -----	9 manholes
Manhole Cleaning -----	29 manholes

## WASTEWATER YEAR END REPORT 2009

Service (renewal) -----	10
Point repair (main line) -----	8 repairs
Point repair (service line) -----	0
Point repair (force main) -----	2 repairs
Manhole inspections -----	0
Main cleaning -----	225,930'
Main stoppage cleaning -----	19,201'
CCTV (main lines) -----	132'
CCTV (service lines) -----	145'
Main line relay -----	150'
Dye Testing -----	0
De-Root Main lines -----	0
Smoke testing (main line) -----	0
Smoke testing (service) -----	2 locations
Manhole Repair/Rehab/Replace/etc. -----	9 manholes
Manhole cleaning -----	127 manholes

## WASTEWATER YEAR END REPORT 2010

Service (renewal) -----	11
Point repair (main line) -----	17 repairs
Point repair (service line) -----	4 repairs
Point repair (force main) -----	4 repairs
Manhole inspections -----	3
Main cleaning -----	142,992'
Main stoppage cleaning -----	18,880'
CCTV (main lines) -----	100'
CCTV (service lines) -----	35'
Main line relay -----	135'
Dye Testing -----	200'
De-Root Main lines -----	1 location
Smoke testing (main line) -----	0
Smoke testing (service) -----	0
Manhole Repair/Rehab/Replace/etc. -----	26 manholes
Manhole Cleaning -----	147 manholes

## WASTEWATER YEAR END REPORT 2011

Service (renewal) -----	14
Point repair (main line) -----	5
Point repair (service line) -----	3
Point repair (force main) -----	9
Manhole inspections -----	8
Main cleaning -----	192,510'
Main stoppage cleaning -----	25,775'
CCTV (main lines) -----	125'
CCTV (service lines) -----	10 locations
Main line relay -----	80'
Dye Testing -----	0
De-Root Main lines -----	3 locations
Smoke testing (main line) -----	0
Smoke testing (service) -----	0
Manhole Repair/Rehab/Replace/etc. -----	9
Manhole cleaning -----	349

## WASTEWATER YEAR END REPORT 2012

Service (renewal) -----	6
Point repair (main line) -----	17 repairs
Point repair (service line) -----	2 repairs
Point repair (force main) -----	2 repairs
Manhole inspections -----	0
Main cleaning -----	110,650'
Main stoppage cleaning -----	40,291''
CCTV (main lines) -----	590'
CCTV (service lines) -----	0
Main line relay -----	257'
Dye Testing -----	0
De-Root Main lines -----	300'
Smoke testing (main line) -----	0
Smoke testing (service) -----	0
Manhole Repair/Rehab/Replace/etc. -----	25 manholes
Manhole Cleaning -----	240 manholes

## WASTEWATER YEAR END REPORT 2013

Service (renewal) -----	13
Point repair (main line) -----	13 repairs
Point repair (service line) -----	2 repairs
Point repair (force main) -----	2 repairs
Manhole inspections -----	0
Main cleaning -----	142,290'
Main stoppage cleaning -----	38,115'
CCTV (main lines) -----	70 locations
CCTV (service lines) -----	10 locations
Main line relay -----	0
Dye Testing -----	0
De-Root Main lines -----	0
Smoke testing (main line) -----	0
Smoke testing (service) -----	0
Manhole Repair/Rehab/Replace/etc. -----	13 manholes
Manhole cleaning -----	275 manholes

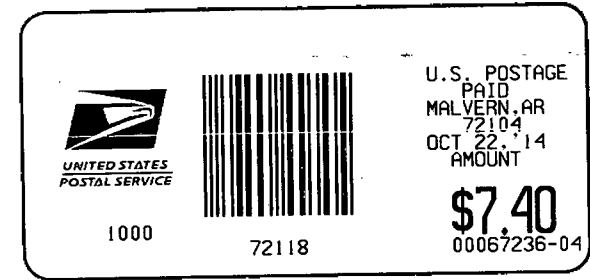
**WASTEWATER YEAR END REPORT  
2014 - SEPTEMBER**

Service (renewal) -----	13
Point repair (main line) -----	8 repairs
Point repair (service line) -----	1 repair
Point repair (force main) -----	0
Manhole inspections -----	0
Main cleaning -----	24,100'
Main stoppage cleaning -----	51,140'
CCTV (main lines) -----	645'
CCTV (service lines) -----	225'
Main line relay -----	0
Dye Testing -----	650'
De-Root Main lines -----	0
Smoke testing (main line) -----	0
Smoke testing (service) -----	0
Manhole Repair/Rehab/Replace/etc. -----	8 manholes
Manhole Cleaning -----	127 manholes

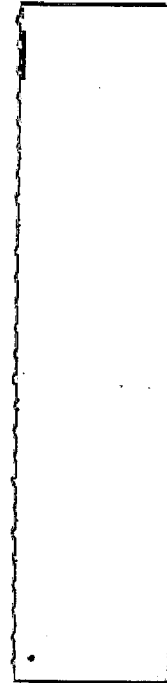
PROBLEM AREA	AMOUNT OF OVERFLOW OVER 3 YEAR PERIOD	DATES OF OVERFLOWS
CITY PARK	15,450	11/11, 12/11, 1/12, 4/12, 9/12, 9/13, 11/13, 12/13, 2/14, 3/14, 8/14
PRIVATE LIFT STATION	37,500	1/12, 6/14
1100 BLOCK PARK ST	20,000	12/12.
ROYAL OAKS/WILSON INTERSECTION	20,000	12/12.
LAUREL/DAVIS	97,600	12/11, 2/12, 3/12, 11/12, 2/12, 3/12, 6/13
1735 SULLENBERGER (WORK FORCE)	9,100	11/12, 11/13, 12/13, 6/14
TOTAL	199,650	

TIME PERIOD	YEARLY OVERFLOW AMOUNT
JAN-DEC 2008	451,355
JAN-DEC 2009	647,875
JAN-DEC 2010	88,765
JAN-DEC 2011	436,100
JAN-DEC 2012	101,330
JAN-DEC 2013	28,200
JAN-SEPT 2014	51,050

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RETURN RECEIPT  
REQUESTED

