



December 15, 2024

Mr. Richard C. Healey
Enforcement Branch Manager
Division of Environmental Quality
Office of Water Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

**RE: UPDATE ON ACTIVITIES FOR CORRECTIVE ACTION PLAN
AMENDED CAO LIS 20-134-001
WEST MEMPHIS UTILITIES
NPDES PERMIT NUMBER AR0022039, AFIN 18-00879**

Dear Mr. Healey:

On behalf of West Memphis Utilities (WMU), please accept the following as an update of activities undertaken since our last update in September, 2024. As outlined in WMU's R-CAP, WMU outlined a plan of action through December 31, 2026. Listed below is a capsule summary of those activities either completed or underway since the original CAP was implemented.

1. WMU continues to meet regularly with their CAP Working Group. Members of this group include Bob Atkins, General Manager, Brett Simms, Assistant General Manager, WMU; Katerina Webb, WMU; and Paul Holloway, WWTP Manager, WMU. Also included in these monthly meetings as necessary are Tim Verner, P.E., Layne Harris, and Chase Carpenter, Fisher & Arnold, and Mac Compton, P.E., RJN Group. This group directs and tracks on-going efforts by WMU staff and all outside consultants and contractors relative to efforts towards the elimination of systemwide SSOs.
2. WMU has begun the replacement of two older dry pit submersible pumps and VFDs at their PS 9. To date, one of these pumps has been replaced, with the remaining pump and drives scheduled to be installed by March 1, 2025. It is important to note this station is fully operational, these pump replacements are being undertaken to increase reliability of this station.

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3. WMU has contracted for the complete rehabilitation of their PS 7, with this work scheduled to commence by February 2025 (expected equipment delivery date).
4. Since our last quarterly report in September 2024, WWTF staff reported no SSOs, and no plant bypasses.
5. Construction for the required expansion of the WWTF commenced on October 1, 2023. To date, the contractor, Max Foote Construction Company, has completed construction of the three new 110-foot diameter secondary clarifiers and installed new clarifier equipment, has constructed the new grit removal structure, is constructing the new oxidation ditch flow splitter structure, has completed the installation of new rotor supports and installed rotors in the first of three existing ditches. The contractor has also begun the construction of the RAS/WAS pump station building and the electrical work to power the new equipment is now well underway. All work is scheduled to be completed by January 26, 2026.
6. Between the period of September 15, 2024 and December 11, 2024, WMU invested approximately \$4,773,810.00 in the planning, engineering, replacement, and/or repair of their sewer collection and treatment systems. Of this total, \$4,733,547.00 has been for actual rehabilitation, replacement, or upgrades to the existing WWTF and PS3/PS4 replacements. The remainder has been for advance planning studies and/or design of sewer infrastructure repairs, rehabilitation, or replacement.
7. WMU is preparing to move forward with the bidding of the CIPP work identified in previously completed SSES efforts in January, 2025. This will encompass the lining of approximately 20,000 LF of 8, 10, 12, 15, 18, and 24-inch gravity sewer mains throughout their collection system. This work is estimated to cost approximately \$6.5 million and take approximately 20 months to complete.
8. WMU, through their flow monitoring subconsultant RJN Group, has commenced post-rehabilitation/construction flow monitoring efforts. Through December 1, 2024, 15 flow monitors and 5 rain fall gauges have been installed, and 32 out of 90 days of monitoring have been completed. Looking forward, the flow monitoring period is expected to be completed by February 5, 2025, data processing by March, 2025, updating and calibration of existing

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collection system model by June 2025, and capacity analysis and additional rehabilitation recommendations by August 2025.

9. As reported in the September 15, 2024 Quarterly Report, WMU is currently working with a local industrial discharger in revising their current industrial discharge permit to add more stringent daily average and maximum BOD limits. Since that time, the local industry is taking steps to appropriately assess the impact of this forthcoming amended permit and plan for specific pre-treatment and/or flow equalization as may be required to meet the proposed amended limits.

Hopefully, this summary of activities is useful to you and your staff and demonstrates the commitment of WMU to eliminate SSOs in their collection system and WWTP bypasses. If you require any additional information, please do not hesitate to contact me at this office.

Sincerely,

FISHER & ARNOLD, INC.



Tim Verner, P.E.
Senior Vice-President

TV/tv

Enclosures

Cc: Bob Atkins, General Manager, WMU





WEST MEMPHIS UTILITY COMMISSION

604 East Cooper

Phone: 870-735-3355

West Memphis, AR 72301

MONTHLY CAP MEETING MINUTES

September 27, 2023

Attending this Teams meeting was Ward Wimbish, PE, GM WMU, Paul Holloway, WWTP Supervisor, Tim Verner, PE, Fisher Arnold.

1. Review Meeting Minutes

- a. Last Month's CAP Meeting Minutes were reviewed and approved.

2. PS 3/PS4 and Common Force Main Extension

- a. PS 3 has been received and the contractor is working with WMU on electric service upgrade.
- b. Final restoration of Lehr Street has been completed.
- c. Coating of tie-in structure is scheduled for early October after coating contractor completes work on project in Memphis.

3. WWTF Modifications

- a. Verner/Contractor have developed alternate clarifier locations and begun the process of revising RAS piping modifications.
- b. Revised Influent/Grit structure discussions are underway to modify the total amount of elevated channel constructed. This will likely require modifications/replacement of existing septage PS.
- c. Revisions to RAS/WAS layout are underway that will likely result in reduction in size of switchgear room in RAS/WAS building that could potentially simplify electric service to aeration basin equipment.



WEST MEMPHIS UTILITY COMMISSION

604 East Cooper

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West Memphis, AR 72301

MONTHLY CAP MEETING

October 22, 2024

1. Review September Meeting Minutes

2. PS 3/PS4 and Common Force Main Extension

- a. The contractor is gathering lien releases, as-built information, and other contract close out documentation. Once completed, he will submit the final application for payment and Summary Change Order to reflect those additional items approved at last month's meeting.

3. WWTF Modifications

- a. The contractor continues construction of new rotor supports in the easternmost oxidation ditch with some installation of fabricated steel support beams for these rotors and walkways.
- b. Installation of clarifier equipment continues.
- c. Work to begin excavation of the southern end of the RAS/WAS building has begun.
- d. Drawings showing modifications to the effluent end of UV structure to add three submersible pumps to direct flow to Project Acorn have been presented to the contractor for pricing. These modifications include extended effluent box, flow baffle wall, submersible pumps, discharge piping, valves, and common mag meter, and common force main to south end of WWTP property. Electrical and control modifications are being finalized to support the new pumps.
- e. The electrician continues with the installation of buried duct bank that will tie the distribution panels in the RAS/WAS building to the new MCC at Oxidation ditches.
- f. Minor backfill around the three clarifiers continues.

- g. MFCC submitted their Application for Payment No. 12 on October 7, 2024. FA reviewed and recommended payment of \$1,521,174.54, bringing the total amount billed to date of \$20,827,431.41.
- h. Other issues
 - i. Temp power for rotors (Existing switchgear in blower building is being assessed with fault current information from Entergy being used in analysis. Based on conversation with electrical engineer this week, modification(s) to this existing gear may not be feasible)
 - ii. Aeration Basin EJ sealing pricing due
 - iii. PS 7 Pricing is due
 - iv. PS 9 Pricing is due (MFCC has reached out to Mark Maddux to supply cost to install the second Flygt pump currently in hand).

4. 2022 Flow Monitoring

- a. RJN

5. 2022 Sewer Main Rehab.

- a. Bid documents for CIPP work are being finalized to show the work progress beginning at Basin 3 then progressing to 15, 10, 17, 13,, and 4. A bid date needs to be targeted so that advertisement dates can be developed and bid packages finalized for bidding.

6. ADEE-DEQ

- a. The December Quarterly Report will be due on December 15, 2024

7. Next Meeting date Wednesday, November 20, 2024, at 10:00 AM



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MONTHLY CAP MEETING MINUTES

October 22, 2024

Attending this meeting was Bob Atkins, GM WMU, Paul Holloway, WMU, Brett Sims, WMU, Katerina Webb, WMU, Mac Compton, RJN, Colton Bryant, RJN, Tim Verner, FA.

1. Review September Meeting Minutes

- a. Approved

2. PS 3/PS4 and Common Force Main Extension

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4. 2022 Flow Monitoring

- a. RJN has commenced installation of flow meters/rain gauges. WMU and TV shall provide PS3/PS4 pump curves to C. Bryant.

5. 2022 Sewer Main Rehab.

- a. Bid documents for CIPP work are being finalized to show the work progress beginning at Basin 3 then progressing to 15, 10, 17, 13,, and 4. A bid date needs to be targeted so that advertisement dates can be developed and bid packages finalized for bidding.

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