

May 5, 2026

Ms. Tiana Toups
Investigator II
Office of Water Quality
Arkansas Department of Energy and Environment
Division of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

RE: City of Danville, Arkansas
Request for Amendment of CAO LIS No. 21-135-001
Extension of CAP Compliance Deadline and Milestone Schedule
NPDES Permit No. AR0022241, AFIN: 75-00037

Dear Ms. Toups:

Harbor Environmental, Inc., a Terracon Company (Harbor), is submitting this letter on behalf of the City of Danville, Arkansas (the "City") in response to your email dated April 28, 2026. We respectfully request an amendment of Consent Administrative Order (CAO) LIS No. 21-135-001 to extend the final compliance deadline and milestone schedule. Additional time is needed to complete the requirements of the CAO.

The City operates its municipal wastewater treatment facility under the authority of NPDES Permit No. AR0022241. The Arkansas Division of Environmental Quality (DEQ) issued the current permit in October 2019; the permit coverage expired in September 2024. An application for permit renewal was filed in February 2024.

The DEQ issued CAO LIS No. 21-135-001 (the "Order") to the City in October 2023. The Order requires installation of a new dechlorination system at the wastewater treatment plant, completion of a Sanitary Sewer Evaluation Study (SSES) to address inflow-infiltration problems, the subsequent preparation of a Sanitary Sewer Overflow (SSO) Plan, and implementation of the corrective actions specified in the SSO Plan. The City has developed a Corrective Action Plan (CAP) to satisfy these requirements. The current milestone schedule includes the following deadlines:

- Install Dechlorination System November 1, 2023
- Submit SSES Report December 31, 2023
- Implement SSO Plan.....September 1, 2024
- Complete CAP July 31, 2025

Harbor is currently working with the City to satisfy the requirements of the CAO and CAP. Several projects are underway. However, the City's resources and funds are limited.

Harbor has developed the design for the proposed dechlorination system and this design has been approved by ADH. An application for an NPDES permit modification and a state construction permit will be submitted to the DEQ in the near future. We anticipate that the DEQ will need approximately six months to issue the necessary permits.

In addition, Harbor is working with the City towards the completion of the SSES. A systematic review of the wastewater flows during the wet Spring months, coupled with smoke testing during the dry Summer months, followed by video inspection and evaluation of the sewer system, will likely require 12 months to complete. Portions of the SSES will be conducted by City personnel to control costs.

We respectfully request on behalf of the City that the CAO and CAP be amended to allow for an adjusted milestone schedule as follows:

- Design and permitting of dechlorination system..... January 1, 2027
- Installation of dechlorination system..... July 1, 2027
- Completion of SSES July 1, 2028
- Implementation of Corrective Actions for SSO Plan January 1, 2030

Please note that completion of the corrective actions for the SSO Plan will be contingent upon the availability of adequate federal and/or state funding to enable the City to make the necessary renovations and repairs.

Harbor and the City will continue to submit quarterly CAP progress reports to the DEQ.

Your consideration of our request for an amended CAO with an extended compliance deadline and milestone schedule is greatly appreciated. Please contact me if you have any questions or need more information. Thank you.

Sincerely,

HARBOR ENVIRONMENTAL, INC.



Andrew Rike, P.E.
Principal, Engineering Dept. Manager

cc.: Ms. Leslie Allen-Daniel, DEQ
Mayor Bill Gilkey, City of Danville
Heath Tate, City of Danville
Anthony Adcock, City of Danville