

ADEQ

ARKANSAS
Department of Environmental Quality

March 20, 2006

Mr. Reggie Corbitt
Little Rock Wastewater Utility
11 Clearwater Drive
Little Rock, AR 72204

RE: CAO LIS No. 06-037

Dear Mr. Corbitt:

Please find enclosed your signed copy of the CAO that ADEQ and LRWU agreed upon to address sanitary sewer overflows. The Director signed the Order on March 9, 2006, which is the effective date of the Order. The Order will be public noticed on or about April 10, 2006. The Order contains several reporting requirements. These requirements are listed in Attachment A (page 17 and 18) of the Order. Many of the items required by the CAO have already been received and will not be required to be resubmitted. The first report is due within 90 days of execution of the Order. According to my calculations, 90 days from March 9, 2006 is June 7, 2006, therefore the items required by Attachment A will be due **June 7, 2006**. Other items required by the Order include the following:

1. LRWU will submit annual reports on the implementation and effectiveness of the collection system management program on **February 28** each year the CAO remains effective. This report shall also indicate which of the construction projects contained in Attachment B were completed during the year and which projects are scheduled for completion in the coming year.
2. Within two weeks of **January 1, 2009**, LRWU shall submit a report to the Department that indicates whether or not the corrective actions taken have achieved the goals established for dry weather overflows. If the goal has not been achieved by January 1, 2009, then the report shall indicate why the goals have not been achieved and what LRWU intends to do to achieve the goal.
3. Within two weeks of **January 1, 2016**, LRWU shall submit a report to the Department that indicates whether or not the corrective actions taken have achieved the goals established for wet weather overflows. If the goal has not been achieved by January 1, 2016, then the report shall indicate why the goals have not been achieved and what LRWU intends to do to achieve the goal. The Department may amend the CAO, if LRWU does not meet the goals for wet weather overflows by January 1, 2016.

Thank you for your attention to this matter. Should you have any questions, feel free to contact me at 501-682-0640 or you may e-mail me at benson@adeq.state.ar.us.

Sincerely,



DENNIS BENSON

Technical Assistance Manager
NPDES Enforcement Section

WATER DIVISION

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

LITTLE ROCK WASTEWATER UTILITY
11 CLEARWATER DRIVE
LITTLE ROCK, ARKANSAS 72204
NPDES PERMIT NO. AR0040177 & AR0021806
AFIN/CSN # 60-00409

LIS NO. 06- 037

CONSENT ADMINISTRATIVE ORDER

This Consent Administrative Order (hereinafter "Order") is issued pursuant to the authority of the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended; Ark. Code Ann. §8-4-101 et seq.) and the regulations issued thereunder (hereinafter collectively referred to as "the Act").

Pursuant to the authority of Ark. Code Ann. §8-4-207(1)(B), the Director for the Arkansas Department of Environmental Quality (hereinafter ADEQ) is authorized to set schedules of compliance for facilities permitted under the Act necessary to assure compliance with both applicable state and federal effluent limitations, including, but not limited to, those mandated by the National Pollutant Discharge Elimination System Program (hereinafter "NPDES") under section 402 of the Federal Water Pollution Control Act, 33 U.S.C. § 1342 as well as under sections 301, 318, and 405 of the Federal Water Pollution Control Act, 33 U.S.C. § 1311, 33 U.S.C. § 1328 and ~~33~~ U.S.C. § 1345; and Arkansas Pollution Control and Ecology Commission Regulations 2, 6, 7 and 8.

The issues herein having been settled by agreement of LITTLE ROCK WASTEWATER UTILITY ("LRWU") and the Director of the Arkansas Department of Environmental Quality ("ADEQ"), it is hereby agreed and stipulated that the following FINDINGS OF FACT and ORDER AND AGREEMENT be entered herein.

FINDINGS OF FACT

1. LRWU is a municipal wastewater utility that serves the City of Little Rock, the City of Cammack Village, and a limited number of customers outside the city limits of Little Rock.
2. LRWU operates and maintains a sanitary sewer system that includes two wastewater treatment plants, a collection system, twenty-four lift stations, and related appurtenances pursuant to Arkansas NPDES Permit Numbers AR040177 and AR0021806, issued by ADEQ.
3. Consistent with the Adams Field WWTP O&M Manual, LRWU's designed operation is to route wastewater flows around the biological processes during periods of wet weather only when necessary to prevent damage to the wastewater treatment plant, and mitigate service backups and sanitary sewer overflows. Wet weather hydraulic loads otherwise could result in the loss of biomass from the treatment plant and cause water quality based NPDES permit violations. The wastewater that is routed around the biological-secondary treatment is mixed back into the treatment process and disinfected prior to discharge. Because of this practice, LRWU has consistently complied with Arkansas Pollution Control and Ecology Commission Regulation No.2, Regulation Establishing Water Quality

Standards for Surface Waters of the State of Arkansas and has not had a significant effluent violation in over 10 years.

4. LRWU has been actively improving its collection system management, operation and maintenance practices since the mid 1980's when it purchased and installed its first collection system management software (Hansen WCMS). Since that time, LRWU has reduced the number of customer "emergency calls", most resulting from private or public sewer backups and system overflows, from around 1,400 to 193 recorded in 2003. Over that same time period, LRWU constructed collection system rehabilitation projects totaling over \$56,000,000 and eliminated over seventy (70) sanitary sewer overflow (SSO) locations.

5. Despite these efforts, LRWU continues to experience wet weather sanitary sewer overflows during heavy rains and was in the initial phases of developing a Sewer Evaluation and Capacity Assurance Plan when the Sierra Club filed a complaint in the U.S. District Court alleging violations of the Little Rock Sanitary Sewer Committee's (LRSSC) NPDES Permits AR0021806 and AR0040177, under 33 U.S.C. § 1311(a) (the "Clean Water Act"). During the course of this litigation, subject to notice to both United States Department of Justice ("US DOJ") and United States Environmental Protection Agency ("US EPA"), the LRSSC entered into a settlement agreement dated September 12, 2001, with the Sierra Club, which was approved by the US DOJ by letter dated November 2, 2001. The settlement agreement established specific performance requirements and compliance deadlines for minimizing non-capacity related ("dry weather") SSOs and minimizing capacity related ("wet weather") SSOs.

6. The NPDES Permits for the Adam's Field Wastewater Treatment Plant (AR0021806) and the Fourche Creek Wastewater Treatment Plant (AR0040177) in Part II, Section B, paragraph 4 states:

Bypass of Treatment Facilities

a. ***Bypass not exceeding limitation.*** *The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Part II.B 4.b. and 4 c.*

b. **Notice**

(1) ***Anticipated bypass.*** *If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass.*

(2) ***Unanticipated bypass.*** *The permittee shall submit notice of an unanticipated bypass as required in part II.D.6 (24-hour notice).*

c. **Prohibition of bypass**

(1) ***Bypass is prohibited and the Director may take enforcement action against a permittee for bypass, unless:***

(a) ***Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;***

(b) *There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal or preventive maintenance; and*

(c) *The permittee submitted notices as required by Part II.B.4.b.*

(2) *The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed above in Part II.B.4.c(1).*

ORDER AND AGREEMENT

In order to further document the actions LRWU is taking to comply with its NPDES Permits and the Sierra Club Settlement Agreement and to be sure that LRWU's actions are fully consistent with the "proper operation and maintenance" clause of the NPDES permits, ADEQ and LRWU agree to the following:

I. **General Requirements**

1. LRWU shall develop a collection system management program capable of allowing LRWU to comply with and maintain the following general standards:

A. Properly manage, operate and maintain, at all times, all parts of collection system that LRWU owns or retains operational control of;

B. Provide adequate capacity to convey base flows and peak flows in

accordance with the System Evaluation and Capacity Assurance Plan (SECAP) already submitted and approved by the Department for all parts of the collection system over which LRWU retains operational control or owns;

C. Take all feasible steps to stop, and mitigate the impact of non-wet weather related sanitary sewer overflows in portions of the collection system over which LRWU retains operational control or owns;

D. Provide notification to parties with a reasonable potential for exposure to pollutants associated with an overflow event.

The overall goal of these requirements is the elimination of capacity and noncapacity related sanitary sewer overflows and to ensure that LRWU shall at all times properly operate and maintain all facilities and systems of treatment and control which are installed or used by LRWU to achieve compliance with Part II, Section B, Paragraph 1 of the NPDES Permit.

2. Develop and submit a written summary of the collection system management program in accordance with the Schedule of Compliance Activities (Attachment A). This summary will be made available to any member of the public upon request.

3. Within ninety (90) days of the date of a request by ADEQ, LRWU shall provide documentation or evidence to ADEQ personnel to confirm compliance with specific program requirements, and if not in compliance, a written explanation of why compliance cannot be achieved.

II. Management/Administrative Requirements

1. Identify with specificity the major goals of the collection system management program, consistent with the general standards identified above.
2. Identify the management/administrative personnel responsible from implementing the collection system management program, including lines of authority by organization chart or similar document and identify the chain of communication for reporting SSOs, beginning with receipt of a complaint or other information, and concluding with the person responsible for reporting to the NPDES authority.
3. Submit documentation identifying LRWU's legal authority to:
 - A. Control private inflow sources;
 - B. Require that sewers and connections be properly designed and constructed;
 - C. Ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals);
 - D. Address flows from satellite municipal collection systems; and
 - E. Implement the general and specific prohibitions of the national pretreatment program which LRWU is subject to under 40 CFR § 403.5.

III. Measures and Activities

LRWU's collection system management program shall provide ADEQ with a list which identifies the individuals, or positions within its organization, responsible for the elements listed below in accordance with the Schedule of Compliance Activities (Attachment A):

1. Lift station operation and maintenance;
2. Geographic Information System – geo-based inventory of collection system assets and associated databases that supports system mapping and other utility operations;
3. Maintenance procedures that insure managers and supervisors are provided timely, relevant information from field personnel in order to establish and prioritize collection system activities (such as the immediate elimination of dry weather overflows or overflows into sensitive waters based upon consideration of factors such as: public drinking water supplies and their source waters, swimming beaches and waters where swimming occurs, shellfish beds, designated Outstanding National Resource Waters, National Marine Sanctuaries, waters within federal, state or local parks, and water containing threatened or endangered species or their habitat);
4. Computerized Maintenance Management System – asset information and work management software used to schedule and track all work performed on collection system, lift station, and wastewater treatment plant (WWTP) assets.
5. Collection system preventive maintenance activities;
6. Assessment of the current capacity of the collection system and treatment facilities which LRWU owns or has operational control of;
7. Identification and prioritization of structural deficiencies and the short-term rehabilitation actions to address each deficiency;
8. Collection system employee training;
9. Equipment and replacement parts inventories, including identification of critical replacement parts; and

10. Trap Control Program to abate impact of fats, oils, and grease (FOG) on collection system.

IV. Design and Performance Provisions

LRWU shall establish requirements and standards for the installation of new sewers, pumps and other appurtenances and rehabilitation and repair projects in accordance with the Schedule of Compliance Activities (Attachment A). The requirements must include specifications and procedures for testing the installation of new sewers, pumps, and other appurtenances - and for rehabilitation and repair projects.

V. Monitoring, Measurement and Program Modifications

LRWU shall submit annual reports on the implementation and measurement of the effectiveness of each element of its collection system management program. LRWU must update program elements based on monitoring or performance evaluations. LRWU must modify the summary of its collection system management program, as appropriate, to keep it updated and accurate.

VI. Sanitary Sewer Overflow Response Plan

LRWU shall develop and implement a Sanitary Sewer Overflow Response Plan in accordance with the Schedule of Compliance Activities (Attachment A), that identifies measures to protect public health and the environment by including, but not limited to, mechanisms to:

1. Ensure that overflows are appropriately responded to, and that reports of overflows are immediately dispatched to appropriate personnel for investigation and appropriate response;
2. Ensure appropriate reporting of overflows in accordance with its NPDES Permits requirements;
3. Ensure appropriate notification of overflows to the public, health agencies, and other impacted entities. LRWU should identify the public health and other officials who will receive immediate notification of overflows;
4. Ensure that appropriate personnel are aware of, trained on and follow the plan, including implementing, the necessary operational changes to provide emergency operational capacity.

VII System Evaluation and Capacity Assurance Plan

LRWU shall prepare System Evaluation And Capacity Assurance Plan (SECAP) in accordance with the Schedule of Compliance Activities (Attachment A), if peak flow conditions are contributing to SSO discharges caused by hydraulic deficiency. The SECAP shall provide:

1. Estimates of peak flows (including flows from SSOs that escape from the system) associated with conditions similar to those causing overflow events;
2. Identify hydraulic deficiencies, including components of the system with limiting capacity, and identify the major sources that contribute to the peak flows associated with overflow events;

3. Establish short and long term capacity enhancements to address each hydraulic deficiency including prioritization, alternative analysis, and a schedule; and
4. Systematic updates to describe any significant change in proposed actions or the implementation schedule. The plan must also be updated to reflect available information on the performance of measures that have been implemented. Plan updates should be submitted in accordance with the Schedule of Compliance Activities (Attachment A).

VIII. Construction Activities and Required Compliance Deadlines

1. To achieve the ultimate goal of LRWU to eliminate dry weather overflows and to ensure proper operation and maintenance of all facilities and systems of treatment and control which are installed or used by LRWU to achieve compliance with the NPDES permit, efforts have been underway since January 2003 to increase collection system maintenance staff. It is the responsibility of these twenty-six (26) new staff members to investigate and take corrective action on surcharging collection systems prior to reaching overflow condition. The addition of new personnel and the on-going LRWU dry weather overflow elimination programs have resulted in a reduction in overflows from one hundred ten (110) in the year 2002 to forty-two (42) in the year 2004. By **January 1, 2009**, LRWU shall achieve compliance with the proper maintenance and operation of the wastewater collection system as it applies to dry weather overflows.
2. To achieve the ultimate goal of LRWU to eliminate wet weather overflows as referred to in Section I.1.B and to ensure proper operation and maintenance of all facilities and systems of treatment and control which are installed or used by LRWU to achieve compliance with the NPDES permit, LRWU shall accomplish tasks identified in the SECAP,

subject to the plan update provisions of Section VII, item 4. The schedules of activities necessary to obtain compliance with the most recent SECAP update are provided in Schedule of SECAP Projects (Attachment B). Notwithstanding periodic updates to the SECAP, LRWU shall achieve compliance with the maintenance and operation of the wastewater collection system, as it applies to capacity related overflows, by January 1, 2016.

IX. Program Audits

On annual basis, LRWU shall conduct an audit, appropriate to the size of the system and the number of overflows, and submit a report of such audit in accordance with the schedule contained in Attachment A of this CAO. The audit shall include, but not be limited to, an evaluation of the collection system management program and its effectiveness in achieving compliance with the "proper operation and maintenance" clause of the NPDES permits and preventing SSOs.

X. Communications

LRWU shall communicate on a regular basis (at least annually) with ADEQ, and other interested parties on the implementation and performance of its collection system management program. The communication system should allow interested parties to provide input to LRWU as the collection system management program is developed and implemented.

XI. Administration and Penalties

1. All submittals required by this Order, including compliance schedules, are subject to approval by ADEQ. In the event of any deficiency, LRWU shall, within thirty (30) days of notification by ADEQ, submit any additional information requested. Failure to adequately respond to the notice of deficiency within thirty (30) days constitutes a failure to meet a deadline and is subject to the civil penalties established in paragraph 2 below.

2. Failure to meet the requirements, deadlines, or the approved schedules of this Order or failure to meet the goals of the SECAP provided for herein constitutes a violation of said Order. If LRWU should fail to meet any such requirement or deadline, the LRWU consents and agrees to pay to ADEQ civil penalties according to the following schedule:

- | | | |
|----|---|---------------------------------|
| A. | First day through the tenth day: | Not to exceed \$100.00 per day |
| B. | Eleventh day through twentieth day: | Not to exceed \$200.00 per day |
| C. | Twenty-first day through thirtieth day: | Not to Exceed \$300.00 per day |
| D. | Each day beyond the thirtieth day | Not to Exceed \$500.00 per day. |

These stipulated penalties may be imposed for delay in performance and shall be in addition to any other remedies or sanctions which may be available to ADEQ by reason of LRWU's failure to comply with the requirements of this CAO. ADEQ reserves the right to collect other penalties and fines pursuant to its enforcement authority in lieu of the stipulated penalties set forth above.

3. If any event occurs which causes or may cause delay in the achievement of compliance by LRWU with the requirements or deadlines of this Order, LRWU shall so notify ADEQ, in writing, as soon as reasonably possible after it is apparent that delay will

result, but in no case after the due dates specified in the schedules above. The notification shall describe in detail the anticipated length of the delay, the precise cause of the delay, the measures being taken and to be taken to minimize the delay, and the timetable by which those measures will be implemented.

4. ADEQ may grant an extension of any provision of this Order, provided that LRWU requests such an extension in writing and provided that the delay or anticipated delay is caused by circumstances beyond the control of LRWU, or otherwise reasonably justified. The time for performance may be extended for a reasonable period but in no event longer than the period of delay resulting from such circumstances. The burden of proving that any delay is caused by circumstances beyond the control of LRWU and the length of the delay attributable to such circumstances shall rest with LRWU. Failure to notify ADEQ promptly, as provided in paragraph 3, shall be grounds for denial of an extension.
5. This CAO is subject to public review and comment in accordance with A.C.A. § 8-4-103(d), however this CAO is effective immediately upon signature of the Director. ADEQ retains the right and discretion to rescind this CAO based upon comments received during the thirty (30) day comment period.
6. As provided by Arkansas Pollution Control and Ecology Commission Regulation 8, this matter is subject to being reopened upon Commission initiative or in the event a petition to set aside this Order is granted by the Commission.

7. Nothing contained herein shall relieve LRWU of any obligation imposed by any other applicable local, state, or federal laws, nor, except as specifically provided for herein, shall this CAO be deemed in anyway to relieve LRWU of responsibilities contained in its permits.
8. Nothing in this CAO shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed herein. Also, this CAO does not exonerate LRWU from any past, present, or future conduct which is not expressly addressed herein, nor does it relieve LRWU of the responsibilities for obtaining any necessary permits.
9. Mailing Guidelines: Documentation and reports required to be submitted by this CAO shall be sent by certified mail, to the following addressee:

Arkansas Department of Environmental Quality
Water Division
P.O. Box 8913
Little Rock, Arkansas 72219

Little Rock Wastewater Utility
Attn: Reggie A. Corbitt, P.E., Chief Executive Officer
11 Clearwater Drive
Little Rock, Arkansas 72204

10. Termination: At such time as LRWU believes that it has complied with all terms and conditions of this CAO, it may request that ADEQ concur whether the requirements of this CAO have been satisfied. Such request shall be in writing and shall provide the necessary documentation to establish whether there has been full compliance with the terms and conditions of this CAO. ADEQ will respond to said request in writing within 90 days of receipt of the request. This CAO shall terminate when all actions

required to be taken by this CAO have been completed, and LRWU has been notified by ADEQ in writing that this CAO has been satisfied and terminated.

SO ORDERED THE 9th DAY OF March, 2006



Marcus C. Devine, Director

APPROVED AS TO FORM AND CONTENT:

BY: Reggie A. Corbett
(Signature)

REGGIE A. CORBITT
(Typed or printed name)

TITLE: CEO Chief Executive Officer
(Typed or printed title)

DATE: March 07, 2006

Attachment A: Schedule of Compliance Activities

All submittals required by this attachment to the Order are subject to review and approval as provided for in Part XI, paragraph 1 of this Order. Within 90 days of the execution of the CAO by the Director of ADEQ, LRWU shall:

1. Develop and submit a collection system management program as provided under item 2 in the *General Requirements*.
2. Submit Major Goals of the collection system management program as required under Item 1 of the *Management/Administrative Requirements*. The Major Goals shall include a schedule for the implementation and achievement of the goals.
3. Submit organization chart listing management personnel responsible for various elements of the collection system program and lines of authority.
4. Submit copies of documents that provide LRWU the legal authority to comply with Item 3 of the *Management/Administrative Requirements*.
5. Provide more detailed description of each element of the Collection System Management Program listed under *Measures and Activities*, and a list of specific individuals or positions responsible for each element.
6. Develop and submit standard specifications for the installation and testing of new sewers, pumps, and other appurtenances.
7. Develop and submit standard specifications outlining requirements for the rehabilitation and repair projects.
8. Develop and submit a Sanitary Sewer Overflow Response Plan.

9. Develop and submit a System Evaluation and Capacity Assurance Plan (SECAP). Any construction projects or improvements required by the SECAP shall include a schedule for construction and implementation of the improvements.

On or before February 28th every calendar year LRWU shall:

1. Submit to ADEQ an annual report on the implementation and effectiveness of each element of its collection system management program as required by Item 1 of Monitoring, Measurement and Program Modifications;
2. Submit to ADEQ the most recent update of LRWU's SECAP, a status report on specific improvements identified in the plan, and a summary of any proposed changes to the content of the SECAP; and
3. Submit an audit report to ADEQ evaluating the effectiveness of the LRWU collection system management program in achieving compliance and preventing SSOs.

Attachment B: Schedule of SECAP Projects

The dates contained in this schedule are subject to SECAP updates, and generally represent initiation of engineering planning and design work through construction completion.

1. The following wastewater main lines shall be rehabilitated, replaced or constructed according to the following schedule:

<u>ACTIVITY</u>	<u>COMPLETION DATE</u>
District 119 Main Line	December 31, 2005
Coleman Creek Main Line	December 31, 2006
Jimerson Creek Main Line	December 31, 2009
Barrow Addition Main Line	December 31, 2009
Leawood	December 31, 2010
Echo Valley	December 31, 2010
Pleasant Valley	December 31, 2010
Maumelle Main Line	December 31, 2012
Barton Main Line	December 31, 2012
Country Club Main Line	December 31, 2012
Allsop Main Line	December 31, 2012
Granite Mountain Main Line	December 31, 2012
Sub-Basin 30100 Main Line	December 31, 2012
Upper 72-inch Parallel Line	December 31, 2013
Rock Creek Main Line	December 31, 2014

2. The following wastewater pumping stations shall be rehabilitated, replaced or constructed according to the following schedule:

<u>ACTIVITY</u>	<u>COMPLETION DATE</u>
60 th Street Wet Weather Retention Project ^A	December 31, 2009
Arch Street PS (45 MGD)	December 31, 2009
Cantrell PS (40 MGD) ^B	December 31, 2015

^A 60th Street Wet Weather Retention Project (also known as 60th Street peak Flow Attenuation Facility) includes the installation of a 50 MGD pump station, 30 MG of

temporary storage, 16,000 l.f. of 48" force main, 5,000 l.f. of gravity main, and a SCADA system with associated control valving. The project also includes increasing the capacity of the Arch Street PS from 38 to 45 MGD and rehabilitation of the pump station building.

^B Cantrell Road PS Improvements project calls for increasing the hydraulic capacity of the pump station from 25 MGD to 40 MGD and will improve the overall conveyance capacity of the Riverfront Subbasin. Other operational improvements will be gained through increasing the size of the wetwell and new screens.

3. The following wastewater treatment plants shall be rehabilitated, replaced or constructed according to the following schedule:

<u>ACTIVITY</u>	<u>COMPLETION DATE</u>
Adams Field WWTP (AR0021806) ^A	December 31, 2006
Fourche WWTP (AR0040177) ^B - 45 MGD	December 31, 2009
Maumelle WWTP (not constructed) ^C	December 31, 2009

^A Adams Field WWTP improvements include the installation of 14 MG equalization basin, upgrades of the main pump station to a peak capacity of 94 MGD, new preliminary screens, upgrades of primary clarifiers, disinfection upgrades, and a new preliminary/primary systems building.

^B Fourche Creek WWTP project will increase the front end peak hydraulic capacity from 38 to 45 MGD in order to handle the flows from the hydraulically upgraded Arch Street PS (part of 60th Street Peak Flow Attenuation Facility project).

^C Maumelle WWTP improvements include the installation of a plant capable of treating an average daily flow of 4 MGD with a peak hydraulic capacity of 14 MGD. The plant will serve the Little Maumelle Basin in northwest Little Rock.