

Cherup, Lisa

DAILY & WOODS

A PROFESSIONAL LIMITED LIABILITY COMPANY
ATTORNEYS AT LAW

JAMES E. WEST
OF COUNSEL

JERRY L. CANFIELD, P.A.
THOMAS A. DAILY, P.A.
WYMAN R. WADE, JR., P.A.
DOUGLAS M. CARSON, P.A.
C. MICHAEL DAILY, P.A. † ●
COLBY T. ROE, P.A.
MICHAEL A. LAFRENIERE

KMW BUILDING
58 SOUTH SIXTH STREET
P.O. BOX 1446
FORT SMITH, AR 72902
TELEPHONE (479) 782-0361
FAX (479) 782-6160

HARRY P. DAILY (1886-1965)
JOHN P. WOODS (1886-1976)
JOHN S. DAILY (1912-1987)
BEN CORE (1924-2007)

† Also Licensed in Oklahoma
● Also Licensed in Wyoming & North Dakota

www.dailywoods.com

WRITER'S E-MAIL ADDRESS
JCanfield@DailyWoods.com

December 27, 2016

Via Federal Express

Director, Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue
Mail Code (6EN)
Dallas, Texas 75202

Deputy Regional Counsel, Enforcement
U.S. Environmental Protection Agency
Region VI
1445 Ross Avenue
Dallas, Texas 75202

Director
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72118-5317

16 DEC 29 P 3:20
DEPT. OF JUSTICE - ENRD
ENVIRONMENT DIVISION

Re: United States of America and State of Arkansas v. City of Fort Smith, Arkansas,
United States District Court, Western District of Arkansas – Case No. 2:14-cv-2266-PKH

Greetings:

Regarding the Continuing Sewer System Assessment (CSSA) Program component of GMOM (paragraphs 43 and 44 of the Consent Decree), the City of Fort Smith hereby submits its Continuing Sewer System Assessment (CSSA) Program Plan for EPA review and approval. As a

DEPARTMENT OF JUSTICE

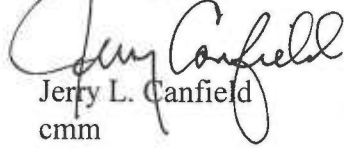
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DEC 29 2016
90-5-1-1-08677

ENRD
ENFORCEMENT RECORDS

deliverable under paragraph 89 of the Consent Decree, the Plan is also submitted to ADEQ. The submission is made in hard copy as well as in electronic and searchable text format.

Thank you for your attention to this matter.

Very truly yours,


Jerry L. Canfield
cmm

Enclosures

cc: Chief, Environmental Enforcement Section (Via Federal Express)
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-1-1-08677

Lisa Cherup <Lisa.Cherup@usdoj.gov>
Leslie Rutledge <oag@ag.state.ar.us>
Carl Geffken <cgeffken@fortsmithar.gov>
Jeff Dingman <jdingman@fortsmithar.gov>
Bob Roddy <broddy@fortsmithar.gov>



CAPACITY, MANAGEMENT, OPERATIONS,
AND MAINTENANCE (CMOM) PROGRAM
AND IMPLEMENTATION PLAN

**Continuing Sewer System
Assessment Program Plan**

December 2016

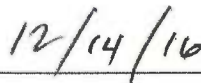
CITY OF FORT SMITH, ARKANSAS

Development of a Capacity, Management, Operation, and Maintenance Program (CMOM) and Assessment and Remediation Plan for Effluent Limit Exceedances

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Robert Roddy, Interim Director of Utilities
City of Fort Smith, AR
Utility Department



Date

Continuing Sewer System Assessment Program Plan

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List of Acronyms

ADEQ	Arkansas Department of Environmental Quality
CCA	Continuing Capacity Assurance
CCTV	Closed Circuit Television
CMOM	Capacity, Management, Operations, and Maintenance
CSSA	Continuing Sewer System Assessment
CTP	Comprehensive Training Plan
CWA	Clean Water Act
DMR	Discharge Monitoring Report
EPA	U.S. Environmental Protection Agency
FOG	Fats, Oil and Grease
GIS	Geographic Information System
I&I	Infiltration and Inflow
IMS	Information Management System
MACP	NASSCO's Manhole Assessment and Certification Program
MGD or mgd	Million Gallons per Day
NASSCO	National Association of Sewer Service Companies
NPDES	National Pollutant Discharge Elimination System
OERP	Overflow Emergency Response Plan
PACP	NASSCO's Pipe Assessment and Certification Program
SOP	Standard Operation Procedure
SSA	Sewer System Assessment
SSO	Sanitary Sewer Overflow
U.S.	United States
WCTS	Wastewater Collection and Transmission System
WWTP	Wastewater Treatment Plant

Definitions

Unless otherwise defined herein, terms used in in the plans comprising the CMOM Program and Implementation Plan shall have the meanings given to those terms in the CWA and the EPA Consent Decree lodged for City of Fort Smith, Arkansas. The terms and acronyms are defined as follows:

ADEQ shall mean the Arkansas Department of Environmental Quality, and any successor departments or agencies of the State of Arkansas.

Annual Report shall mean the report to be submitted annually pursuant to Section X of the Consent Decree.

Article shall mean a portion of Section V ("Comprehensive Remedial Requirements" Section) of the Consent Decree.

Basin shall mean a section of a Sewershed that is a distinct wastewater collection area, and designated by Fort Smith as such.

Building/Private Property Backup shall mean a wastewater backup into a building and/or a wastewater overflow onto private property that is caused by blockages, flow conditions or other malfunctions in the WCTS. "Building/Private Property Backup" does not include a wastewater backup into a building and/or a wastewater overflow onto private property that is caused solely by a blockage or other malfunction of a Private Service Lateral or other piping or conveyance system that Fort Smith does not own or operate.

Calendar Year shall mean the twelve (12) month period starting on January 1 and ending on December 31 of a given year.

Capacity Constraint shall mean those discrete components, or groups of components of the WCTS that are determined by the City, consistent with Section V, Article Four ("Capacity Assessment and Hydraulic Modeling") of the Consent Decree to have capacity deficiency issues that have caused or significantly contributed to previous capacity-related SSOs; that are likely to cause or significantly contribute to future capacity-related SSOs; and/or that are identified as overflow locations for any storm event presented in Section V, Article Four, Paragraph 30.

City or Fort Smith shall mean the City of Fort Smith, Arkansas.

Clean Water Act or CWA shall mean the Federal Clean Water Act found at 33 U.S.C. §§ 1251- 1387.

CMOM or Capacity, Management, Operations, and Maintenance shall mean a program of accepted industry practices to properly manage, operate and maintain sanitary sewer collection, transmission and treatment systems, investigate capacity constrained areas of these systems, and respond to SSO events, including as identified by the Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs (EPA, Jan. 2005).

Consent Decree or Decree shall mean the Decree (and all Appendices) lodged by the U.S. EPA against the City of Fort Smith.

Consultant shall mean a professional engineer licensed in the State of Arkansas or other recognized professional within a field of practice, with appropriate qualifications, experience and adequate staff and resources necessary to undertake any program plan, study, analysis, design or report required by the terms of the Consent Decree.

Contractor shall mean a person or entity who in pursuit of its business undertakes to perform a job or piece of work, retaining in himself control of means, method and manner of accomplishing the desired result.

Critical Response Time shall mean the time interval between activation of the high wet well level alarm at a Pump Station and the first SSO from the WCTS tributary to that Pump Station under peak dry-weather flow conditions or under peak wet-weather flow conditions (generated by the analysis rainfalls presented in Section V, Article Four ("Capacity Assessment and Hydraulic Modeling") of the Consent Decree), whichever weather conditions prevail at the time of the SSO.

Cross-Connection shall mean any constructed connection, whether by pipe or any other means, between any part of the WCTS and any part of a storm water drainage system that is capable of conveying flow between the two systems.

Date of Lodging shall mean the date the United States filed a copy of the Consent Decree signed by all Parties with the District Court, along with the Complaint, prior to submitting the Consent Decree for publication in the Federal Register to provide an opportunity for public review and comment thereon. The Date of Lodging for the City's Consent Decree is January 02, 2015 (1/2/2015).

Day or Days shall mean a calendar day or calendar days unless expressly stated to be a business day or business days. In computing any period of time under the Consent Decree, where the last Day would fall on a Saturday, Sunday, or a Federal or State holiday, the period shall run until the close of the next business day.

Deliverable shall mean any written document required to be prepared and/or submitted by or on behalf of Fort Smith pursuant to the Consent Decree.

Direct Discharge shall mean a sewer pipe installed to convey wastewater from a sanitary sewer for release into the environment.

Environmental Protection Agency or EPA shall mean the United States Environmental Protection Agency and any successor departments or agencies of the United States.

Equalization Facilities or EQ Facilities shall mean those components of the WCTS designated, designed or intended for the temporary storage of wet-weather wastewater flows.

Fats, Oil and Grease or FOG shall mean fats, oil and grease, whether petroleum-based, mineral-oil-based, animal-based or vegetable-based.

FOG Control Device shall mean any grease interceptor, grease trap, or other mechanism, device, or process that attaches to or is applied to wastewater plumbing fixtures and/or Private Service Lines to collect, contain, or remove FOG from the wastewater stream of a FOG Generator prior to discharge into the WCTS.

FOG Control Program Plan or **Fats, Oil and Grease Control Program Plan** shall mean Fort Smith's program to control discharge of FOG into the WCTS as developed and approved under **Section V, Article Seven, Paragraph 37** of the Consent Decree.

FOG Generator shall mean any food service establishment or food-processing establishment that discharges FOG into the WCTS, provided, however, that those establishments covered by the City's industrial user program shall not be considered a FOG Generator for the purposes of the Consent Decree.

Force Main shall mean any pipe that receives and conveys, under pressure, wastewater from the discharge side of a pump. A Force Main is intended to convey wastewater under pressure.

Gravity Sewer Line shall mean a pipe that receives, contains and conveys wastewater not normally under pressure, but intended to flow unassisted under the influence of gravity.

Small-Diameter Gravity Sewer Lines shall mean Gravity Sewer Lines that are less than twenty-four (24) inches in diameter.

Large-Diameter Gravity Sewer Lines shall mean Gravity Sewer Lines that are twenty-four (24) inches or greater in diameter.

Infiltration as defined by 40 C.F.R. § 35.2005(b)(20) shall mean water other than wastewater that enters a WCTS (including sewer service connections and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes.

Inflow as defined by 40 C.F.R. § 35.2005(b) (21) shall mean water other than wastewater that enters a WCTS (including sewer service connections) from sources such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, storm water, surface runoff, street wash waters, or drainage.

Infiltration and Inflow or **I&I** shall mean the total quantity of water from Infiltration and Inflow without distinguishing the source.

Interest shall mean interest accruing on a sum calculated in the manner provided by 28 U.S.C. § 1961.

Manhole Assessment and Certification Program or **MACP** shall mean the **National Association of Sewer Service Companies (NASSCO)** Manhole Assessment and Certification Program.

Massard Permit shall mean NPDES Permit Number AR0021750 issued to City pursuant to Section 402 of the Clean Water Act, 33 U.S. § 1342, and the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. § 8-4-10, et seq., for the Massard POTW and any future extended, modified or reissued permit.

Massard WWTP shall mean the publicly owned treatment works that is owned and operated by the City and that is located in Fort Smith with an address of **1609 North 9th Terrace, Barling, Arkansas**.

Month shall mean one calendar month running from a numbered day to the same numbered day of the following calendar month, regardless of whether the particular month has 28, 29, 30, or 31 days. If a triggering event would occur on a day of the month that does not exist (for example, February 30), then the event shall be due on the first day of the following month (for example, March 1).

NASSCO shall mean the National Association of Sewer Service Companies.

P Street Permit shall mean NPDES Permit Number AR0033278 issued to City pursuant to Section 402 of the Clean Water Act, 33 U.S.C. § 1342, and the Arkansas Water and Air Pollution Control Act, Ark. Code Ann. § 8-4-10, et seq., for the P Street POTW and any future, extended, modified or reissued permit.

P Street WWTP shall mean the publicly owned treatment works that is owned and operated by City and that is located at **13 North P Street in Fort Smith, Arkansas**.

Pipe Assessment and Certification Program or **PACP** shall mean the NASSCO Pipe Assessment and Certification Program.

Pipe Segment shall mean the portion of a Gravity Sewer Line extending from manhole to manhole.

Private Service Line shall mean a sewer line which is not owned or operated by City, but which conveys wastewater from a building to a main line of the WCTS.

Private Service Line Release shall mean any spill, release, or diversion of sewage from a Private Service Line to any location other than the WCTS caused solely by a blockage or other malfunction in that Service Line, even if the release does not reach Waters of the State or waters of the United States.

Pump Station or Pumping Station shall mean facilities owned or operated by Fort Smith that contain pumps that lift wastewater from a lower to a higher hydraulic elevation, including all related electrical, mechanical, and structural systems necessary to the operation of that Pump Station within the WCTS.

Recurring Private Service Line Release shall mean a Private Service Line Release that has occurred within three (3) years of a prior Private Service Line Release at the same location.

Recurring SSO, Recurring Dry-Weather SSO, and Recurring Wet-Weather SSO. A "Recurring SSO" shall mean any SSO that has occurred within three (3) years of a prior SSO that occurred at the same location under any weather conditions (wet or dry). A "Recurring Dry-Weather SSO" shall mean an SSO that has occurred during dry weather within three (3) Years of a prior SSO at the same location that also occurred during dry weather. A "Recurring Wet-Weather SSO" shall mean an SSO that has occurred during wet weather within three (3) Years of a prior SSO at the same location that also occurred during wet weather.

Remedial Measures shall mean spot repairs, trenchless sewer rehabilitation, sewer replacement, repair or reconstruction, and any other appropriate WCTS improvement technique for resolving condition deficiencies and/or capacity deficiencies in a particular system asset or group of assets within the WCTS, in accordance with **Appendix D** of the Consent Decree ("Remedial Determination Process"), that have caused or significantly contributed to previous SSOs, and/or, that are likely to cause or significantly contribute to future occurrence of SSOs.

Sanitary Sewer Overflow or **SSO** shall mean any spill, release, or diversion of sewage from the WCTS, including: (1) an overflow that results in a discharge to Waters of the State or waters of the United States, and (2) an overflow of wastewater, including a wastewater backup into a building or wastewater overflow onto private property, such as a Building/Private Property Backup (other than a backup caused solely by a blockage or other malfunction in a privately owned sewer or building

lateral (i.e. a "Private Service Line")), even if that overflow does not reach Waters of the State or waters of the United States.

Sewershed shall mean a section of City's WCTS that is a distinct drainage or wastewater collection area and designated as such by City for the P Street WWTP and the Massard WWTP.

State of Arkansas or **State** shall mean the State of Arkansas acting on behalf of ADEQ.

Sub-basin shall mean a section of a Basin that is a distinct wastewater collection area and designated by Fort Smith as such.

Tabulation shall mean a document in a format containing text searchable cells or fields that is also sortable by data category.

United States or **U.S.** shall mean the United States of America, acting on behalf of EPA.

Wastewater Treatment Plant or WWTP shall mean the Massard or P Street wastewater treatment plants and components thereof.

Wastewater Collection and Transmission System or WCTS shall mean the sanitary sewer collection, retention and transmission systems for both the Massard WWTP Sewershed and the P Street WWTP Sewershed, including all pipes, Force Mains, Gravity Sewer Lines, Pump Stations, EQ Basins, manholes and appurtenances thereto, that are owned or operated by City at any time from the Date of Lodging of the Consent Decree until its termination under Section XXIV.

Waters of the State shall mean all streams, lakes, marshes, ponds, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies of accumulations of water, surface and underground, natural and artificial, public or private, which are contained within, flow through, or border upon the State of Arkansas, or any portion of the State of Arkansas, as defined in Ark. Code Ann. §84-102(10).

Year shall mean a twelve-month period regardless of the beginning date. In the event a triggered event shall be due on a year ending date that does not exist (for example, February 29 in some years), then the event shall be due on the first day of the following month (for example, March 1).

Capacity, Management, Operation, and Maintenance (CMOM) Program Summary and Intent

On January 2, 2015, the City of Fort Smith, Arkansas (City) entered into a Consent Decree with the United States Environmental Protection Agency (EPA) and the State of Arkansas to address deficiencies within the City's wastewater collection and transmission system (WCTS). Per Section V, Article Seven of the Consent Decree, the City will prepare an effective WCTS Capacity, Management, Operation, and Maintenance Program ("CMOM Program") consistent with EPA's 2005 Guidance entitled "Guide for Evaluating Capacity, Management Operation and Maintenance Programs at Sanitary Sewer Collection Systems." All components of the CMOM Program, as set forth in Paragraphs 37-56, shall be submitted in report form to EPA for review and approval at a date no later than 24 months from the Date of Lodging, with shorter submission dates for certain components. The Date of Lodging for the Consent Decree has been established as January 2, 2015.

The aggregate CMOM Program is comprised of thirteen (13) separate components that were developed to address deficiencies within specific elements of the City of Fort Smith's WCTS. Upon approval by EPA, each of the respective CMOM components is intended to be used by the City of Fort Smith as guidelines for the implementation of a defined set of procedures to satisfy the requirements of the Consent Decree and promote compliance with the Clean Water Act (CWA).

Section 1

Consent Decree Requirements for the Continuing Sewer System Assessment Program Plan

The Continuing Sewer System Assessment (CSSA) Program Plan described herein has been prepared to satisfy the requirements set forth in Article Seven, Paragraph 43 and 44 of the Consent Decree and must be submitted to EPA for review no later than twenty-four (24) months from the Date of Lodging of the Consent Decree (i.e., by December 31, 2016). Following EPA's approval of this plan and completion of all Sewer System Assessment (SSA) activities, the Utility Department will initiate the implementation of the CSSA Program. **Table 1-1** provides a list of the Consent Decree requirements for the CSSA Program and the section of this document that addresses each requirement.

Table 1-1 Summary of Consent Decree Requirements for the CSSA Program

Consent Decree Paragraph	Consent Decree Requirement	CSSA Program Plan Section
43	Sub-basin Priority –Sub-basins 10-4, 22-2, and 22-4 as identified in the Sewer System Assessment (SSA) reports listed by the City under Section V, Article One (“Sewer System Condition Assessments”), Paragraph 10 shall be the first priority for CSSA activities.	3.3
43	Remedial Measures – Any remedial measures identified as a result of this ongoing CMOM CSSA Program shall be developed in accordance with Appendix D (“Remediation Determination Process”).	3.4
43	Private Service Lines – The City shall address the remediation of defects discovered in Private Service Lines through CSSA efforts or as otherwise become known to the City in accordance with Paragraph 54.	3.1.2
44	CSSA Program shall include, but not be limited to:	3.2
44	a Closed circuit television (CCTV) inspection of non-plastic small-diameter (<24-inch) gravity sewer lines not less frequently than once every twelve (12) years;	
	b CCTV inspection of plastic small-diameter (<24-inch) gravity sewer lines, fully cured-in-place pipe (CIPP)-lined non-plastic small-diameter gravity sewer lines, and all large-diameter (≥24-inch) gravity sewer lines not less frequently than once every twenty (20) years;	
	c Visual manhole inspection not less frequently than once every eight (8) years; and	
	d All other system investigations deemed necessary by the City to assure continued operation of the WCTS in accordance with the objectives of the Consent Decree.	

Section 2

Purpose and Goals of the Continuing Sewer System Assessment Program

The CSSA Program is a component of the City's comprehensive CMOM Program to establish the continuing assessment of the gravity portions of the City's WCTS. The CSSA Program will begin following completion of all Sewer System Assessment (SSA) activities as described in Section V, Article One of the Consent Decree. The SSA activities on the gravity sewer lines and manholes are set forth in Appendix C of the Consent Decree and will be completed no later than eight (8) years from the Date of Lodging. The CSSA Program is intended to build upon the SSA activities and assess sewer infrastructure conditions on an ongoing basis using a variety of inspection techniques. Furthermore, the condition information collected shall be used in support of the maintenance and remedial measures of the WCTS and the continued rehabilitation of the WCTS to reduce the occurrence of sanitary sewer overflows (SSOs). The purpose of the CSSA Program is to develop an ongoing sewer assessment and evaluation process by which the Utility can identify issues in the WCTS and address those issues for continued operation of the WCTS in accordance with the objectives of the Consent Decree.

Section 3

Elements of the Continuing Sewer System Assessment Program Plan

The CSSA Program will begin following the completion of all SSA Program activities described in Section V Article One of the Consent Decree. SSA Program activities are required to be completed eight (8) years from the Date of Lodging, i.e., by December 31, 2022. Therefore, the CSSA Program is anticipated to begin in January 2023. Any remedial measures identified as a result of the CSSA Program will be developed in accordance with the Remediation Determination Process outlined in Appendix D of the Consent Decree. The Utility will address the remediation of actionable defects discovered in private service lines through CSSA efforts, or as otherwise become known to the Utility in accordance with Paragraph 54 of the Consent Decree (i.e., under the Private Service Line Defect Remediation Program).

In addition to these central program elements, Standard Operating Procedures (SOPs), training, reporting, and incorporation of SSA data into the City's Information Management System (IMS) are all critical elements of the implementation of an effective CSSA Program. Once implemented, the CSSA Program will serve predominantly as a proactive continuing assessment component of the CMOM Program.

3.1 Related Consent Decree Programs

The CSSA Program is related to several other CMOM programs outlined in the Consent Decree by way of sharing data and establishing priorities. Each of these related programs is discussed briefly in the subsequent sections and will be considered during the implementation of the CSSA Program.

3.1.1 Sewer System Assessment

As a condition of the Consent Decree, the Utility must conduct SSA activities for the gravity sewer lines and manholes in the WCTS. The SSA activities involve evaluation activities to identify structural and non-structural defects in the WCTS that have caused or significantly contributed to previous SSOs and/or that are likely to cause or significantly contribute to the future occurrence of SSOs. The SSA activities outlined in the Consent Decree must be completed no later than eight (8) years from the Date of Lodging (i.e., no later than December 31, 2022). The CSSA Program will begin following the completion of all SSA activities (expected start date of January 2023). When the SSA activities are complete and the CSSA program is implemented, the Utility will have assessed and completed remedial measures in the majority of their system, and the CSSA program will be a continuation of that effort.

3.1.2 Private Service Line Defect Remediation Program

The purpose of the Private Service Line Defect Remediation Program, outlined in Paragraph 54 of the Consent Decree, is to encourage private service line owners to remediate defects in private service lines that contribute to SSOs. Potential defects are identified during SSA activities, CSSA

activities, and other WCTS operation/maintenance efforts; therefore, this CSSA Program will identify potential private service line defects which would then be addressed under the Private Service Line Defect Remediation Program.

3.2 CSSA Elements

The CSSA Program is comprised of the following central elements:

- Closed circuit television (CCTV) inspection of non-plastic small-diameter gravity sewer lines once every twelve (12) years;
- CCTV inspection of plastic small-diameter gravity sewer lines (<24-inch), fully cured-in-place pipe (CIPP)-lined non-plastic small-diameter gravity sewer lines, and all large-diameter (≥24-inch) gravity sewer lines once every twenty (20) years;
- Visual manhole inspection once every eight (8) years; and
- All other system investigations deemed necessary by the Utility to assure continued operation of the WCTS in accordance with the objectives of the Consent Decree.

3.3 Prioritization

As required in the Consent Decree, sub-basins 10-4, 22-2, and 22-4 will be the first priority for CSSA activities. Subsequent priorities will be established considering the results of SSA activities, remedial measures, reported sanitary sewer overflow (SSO) locations, and other CMOM Program data.

3.4 Remedial Measures

In the course of implementing the CSSA activities, Utility staff will conduct inspections of the sewer system to evaluate the operation of the WCTS and identify remedial measures to address defects that are likely to cause or significantly contribute to the future occurrence of SSOs. Remedial measures identified as a result of the CSSA Program will be developed in accordance with Appendix D of the Consent Decree (“Remediation Determination Process”).

Section 4

Record Keeping and Reporting

This section of the Plan describes procedures for record keeping and reporting for the CSSA Program, as well as procedures for the periodic review, evaluation, and revision of this Plan.

4.1 Record Keeping

As required by the Consent Decree, records associated with the CSSA Program will be saved in the Utility Department's document management system and maintained as required under the records retention policy.

The City is currently updating its strategy for managing its field and office information. The City's plan for modifying its IMS, as described in Article Seven, Paragraph 50 of the Consent Decree, is being submitted to EPA for approval within twenty-four (24) months of the Date of Lodging (i.e., by December 31, 2016).

4.2 Reporting

Per Article Seven, Paragraph 43 of the Consent Decree the Utility must report all CSSA activities performed, the respective WCTS Remedial Measure completed, and the status of the Private Service Line remediation efforts each calendar year in the Annual Report for that calendar year as described in Section X of the Consent Decree.

The Annual Report will include the following information related to the CSSA Program, as outlined in Paragraph 94.d of the Consent Decree:

- Footage of CCTV inspection conducted by diameter and pipe material;
- Number of manholes inspected;
- Number of Remedial Measures identified; and
- Number of SSOs resulting from structural defects.

4.3 Periodic Review, Evaluation, and Revision

As part of the Utility's annual reporting process, this Plan shall be reviewed and evaluated by Utility personnel in order to determine whether the objectives set forth by the Consent Decree are being met or improvements to the plan are needed. If an element of this Plan is identified as being ineffectual or impracticable, then the Utility will propose the necessary amendments or submit a revised plan as part of the Annual Report.

Section 5

Training and Standard Operating Procedures

5.1 Training

Per Article Seven, Paragraph 55 of the Consent Decree, the CMOM Program must include a Comprehensive Training Program (CTP) for technical and skills training for appropriate categories of the Utility's employees. The CTP plan was submitted to EPA for approval within eighteen (18) months of the Date of Lodging (submitted June 28, 2016). The CTP is directly related to the operation and maintenance of the sanitary sewer collection system for the purpose of responding to and preventing SSOs.

5.2 Standard Operating Procedures (SOPs)

The plan and schedule for developing SOPs for general operation and maintenance of all components of the WCTS was detailed in a report submitted to EPA within eighteen (18) months of the Date of Lodging (submitted June 28, 2016) per the Consent Decree.