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December 22, 2015

Via Federal Express

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

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

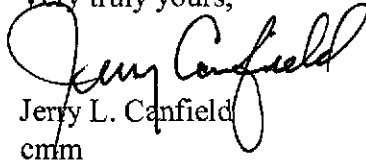
Greetings:

Regarding the Sanitary Sewer Overflow Reporting and Documentation component of CMOM (paragraph 17 of the Consent Decree), the City of Fort Smith hereby submits its Sanitary Sewer Overflow Documentation and Reporting Plan for EPA review and approval. As a 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
cmf

Enclosures

cc: Chief, Environmental Enforcement Section (Via Federal Express)
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CAPACITY, MANAGEMENT, OPERATIONS, AND MAINTENANCE (CMOM) PROGRAM AND IMPLEMENTATION PLAN

Sanitary Sewer Overflow Documentation and Reporting Program Plan


December 2015

CITY OF FORT SMITH, ARKANSAS

Capacity, Management, Operation, and Maintenance Program

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.





Steve Parke, Director of Utilities
City of Fort Smith, AR
Utility Department



Date

Sanitary Sewer Overflow Documentation and Reporting 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, & 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, or expressly stated in the City of Fort Smith Sewer Use Ordinance, terms used 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 and Summary 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 two (2) years 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 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 long-term requirements of EPA and promote compliance with the Clean Water Act (CWA).

Section 1

Consent Decree Requirements for the Sanitary Sewer Overflow (SSO) Documentation and Reporting Program Plan

The SSO Documentation and Reporting Program Plan described herein has been prepared to satisfy the requirements set forth in Article Seven, Paragraph 47 of the Consent Decree and must be submitted to EPA for review within twelve (12) months from the Date of Lodging of the Consent Decree (i.e., by December 31, 2015). Following EPA's approval, the City will initiate the implementation of the SSO Documentation and Reporting Program. **Table 1-1** includes a list of the Consent Decree requirements for the SSO Documentation and Reporting Program and the corresponding section of this document that addresses each requirement.

Table 1-1 Summary of Consent Decree Requirements for the SSO Documentation and Reporting Program

Consent Decree Paragraph	Consent Decree Requirement	SSO Documentation and Reporting Program Plan Section
47.a.	Immediate SSO Reporting: All SSOs shall be reported to both the EPA and ADEQ utilizing ADEQ's Sanitary Sewer Overflow (SSO) Online Report system, available on ADEQ's website, within twenty-four (24) hours of when the City first became aware of the SSO.	3.1
	In instances where the ADEQ online reporting system is not available, the City shall meet the immediate reporting requirement by submission to ADEQ's Enforcement Branch of the Water Division by facsimile using a printed version of ADEQ's online report form, or a form which presents the ADEQ required information in essentially the same format. The completed form should be faxed to (501) 682-0880.	3.1.3
	In instances where the ADEQ online reporting and ADEQ facsimile reporting are not available, the City shall report to ADEQ's Enforcement Branch of the Water Division on or before the next business day by telephone at (501) 682-0640.	
47.b.	Monthly Reporting Requirements: With the City's Monthly Discharge Monitoring Reports ("DMR's"), the City shall continue to provide printed copies to EPA of all Immediate SSO Reports submitted to ADEQ during the reporting period, directed to 6EN-WC-Water Enforcement and to ADEQ, directed to NPDES Enforcement Section, Water Division.	3.2
47.c.	Annual Reporting Requirements: The City shall submit a Tabulation of the SSOs occurring in each Calendar Year as part of the Annual Report for that Calendar Year in accordance with Section X "Reporting" of the Consent Decree.	3.3

Section 2

Purpose and Goals of the SSO Documentation and Reporting Program

The purpose of the City of Fort Smith's SSO Documentation and Reporting Program is to facilitate the prompt and appropriate reporting of any observed SSO to satisfy the reporting requirements of both the Arkansas Department of Environmental Quality (ADEQ) and EPA. The reporting procedures described herein shall apply to all SSOs in the WCTS, regardless of where the SSO occurs, or whether the SSO occurs during dry weather or wet weather.

The SSO Documentation and Reporting Program must be coordinated with the Sanitary Sewer Overflow Emergency Response Program (OERP) which identifies the response measures to protect public health and environment from SSO events. The SSO Documentation and Reporting Program includes SSO reporting procedures for both the EPA and ADEQ; thereby ensuring both regulatory agencies are informed of all SSOs and resulting response measures in a timely manner.

Private Service Line Releases are not considered SSOs and are excluded from the SSO Documentation and Reporting Program.

Section 3

SSO Documentation and Reporting Procedures and Responsibilities

The administration and implementation of the SSO Documentation and Reporting Program requires adequate staff, equipment, software/hardware resources, and pre-planning. This section discusses the procedures and responsibilities for reporting SSOs on an immediate, monthly, and annual basis.

This plan defines internal and external communication required to report an SSO. Agencies, departments, and personnel that must be notified are identified, including associated telephone numbers or other pertinent information. The procedures described in this plan apply only to the WCTS.

3.1 Immediate Reporting

3.1.1 Chain of Responsibility

Accurate and timely reporting by the Fort Smith Utility Department is the foundation of the procedures outlined within this plan. In following the City's Organizational Chart (effective January 1, 2016), the Sewer System Program Manager will ultimately be responsible for inputting data into the ADEQ electronic reporting form. The Sewer System Program Manager's reporting responsibilities will encompass any and all SSOs, whether occurring within the City's gravity sewer system, force mains, pump stations, or at the plants, with the exception of wastewater treatment plant (WWTP) bypasses.

In instances where the Sewer System Program Manager is unavailable, the chain of responsibility for reporting the SSO will pass to the Deputy Director of Systems, and then to the Director of Utilities.

For the purposes of this plan, WWTP bypasses, if any, are excluded from being reported as SSOs on the ADEQ's SSO Online Report form. Instead, any WWTP bypass shall be reported under the NPDES permit Discharge Monitoring Report (DMR) for the WWTP.

3.1.2 ADEQ Online Reporting System

Within 24 hours of when the City first becomes aware of an SSO within the WCTS, such as being alerted by way of a citizen's call, the System Control Group will initiate the response procedures as outlined in the OERP Plan. Upon verification and response, the Sewer System Program Manager will report the event to ADEQ and EPA using the ADEQ's SSO Online Report form. Timeframes appropriate for information gathering are detailed in the OERP Plan.

The ADEQ online form is located at the following address:

http://www2.adeq.state.ar.us/water/branch_enforcement/forms/ssr_report.asp

See **Figure 3-1** for a screenshot of ADEQ’s SSO Online Report form. For the purposes of the SSO Documentation and Reporting Program, the following information should be entered for an SSO event:

1. SSO, Bypass or Upset:

The SSO box will be checked, reflecting that a sanitary sewer overflow has occurred.

2. Facility Permit Number and Facility Name:

The facility name and permit number given will be the WWTP service area in which the sanitary sewer overflow has occurred.

- P Street WWTP – NPDES Permit No. AR0033278
- Massard WWTP – NPDES Permit No. AR0021750

3. Date and Time Overflow Began:

The start date and time of the SSO is the date and time the System Control Operator recorded notification of a possible SSO.

4. Date and Time Overflow Ended:

The end date and time of the SSO is the date and time when discharge has ceased.

5. Location:

The location of the SSO will be documented by the asset identification number and street address. If that information is not available, other appropriate location identifiers should be included, such as latitude and longitude or geographic description. For an SSO on Private Property, both the street address and the asset identification number for the nearest manhole should be used.

The location field will also include where the overflow went, such as yard, ditch, stream, storm sewer, building, etc.

6. Type of Overflow:

The type(s) of overflow will be identified by checking all that apply from the following options:

- Manhole
- Lift Station
- Main Line
- Service Line
- Other

If the “Other” box is checked, a brief description of the type of SSO will be entered.

7. Cause of Overflow:

The cause(s) of overflow will be identified by checking all that apply from the following options:

- I&I – Rainfall
- Roots
- Grease
- Debris
- Equipment Failure
- Construction
- Vandalism
- Power Failure
- Line Failure / Break
- Other

If the “Other” box is checked, a brief description of the cause of SSO will be entered.

8. Volume:

The estimated volume of the SSO will be entered in gallons.

9. Impact of SSO Event:

The impact of overflow will be identified by selecting the first category that applies from the following list:

- SSO Reached Receiving Water (river, stream)
- SSO Reached Public Land Only (ground)
- SSO Affected Private Property (ground)
- Basement Backup

The “Occurred at Treatment Plant” option should be reported as a bypass and does not apply to this SSO Documentation and Reporting process.

10. Action Taken:

The actions taken to address the SSO will be identified by checking all that apply from the following options:

- Machine Rodded
- Disinfected and Deodorized
- Jet-Vac
- Hydro Cleaned
- Hand Rodded
- Spread Line on Affected Area
- Used Generator to Power Pumps/Equipment
- Public Notification
- Other

If the “Other” box is checked, a brief description of the actions taken to address the SSO will be entered.

11. Environmental Damage:

The environmental damage will be identified by checking all that apply from the following options:

- OEHC-Observed or Evidence of Human Contact
- NEAH-No Evidence of Adverse Health/Environmental Impact
- OEEI-Observed or Evidence of Environmental Impact
- EFK-Evidence of Fish Kill

12. Reported By:

The name of the person reporting the SSO, their job title, and a contact phone number will be included on the form.

13. Additional Comments (if Needed):

This section should only be utilized if additional information is required, i.e. if the SSO is still discharging or if further investigation is necessary and the reason(s) why.


14. Email a Copy of This Report to the Email Address:

To receive a copy of the SSO report for confirmation and records retention purposes, the following email address will be entered based upon whether the Report is complete or whether it is incomplete at the time of submittal and a follow-up, 5-day Report is required:

- Complete reports: SSORptConfirm@FortSmithAR.gov
- Incomplete reports: SSORptConfirm5Day@FortSmithAR.gov

These email addresses serve as distribution lists within the City, documenting submittal of the report and notifying appropriate personnel of the occurrence and status of an SSO.

If all of the above information is not available when the 24-hour Report is submitted, e.g. the SSO has not ceased, the 24-hour Report will be submitted with as much information as possible. The Sewer System Program Manager will assign the continued monitoring of the SSO to the response personnel until complete information is available. At that time, and no later than five (5) days from the start date/time of the SSO, the Sewer System Program Manager (or Deputy Director of Systems or Director of Utilities, in this priority) will prepare and submit to ADEQ a 5-day Report, via the same procedures as the 24-hour Report. If a complete report cannot be submitted within five days, a 5-day Report will be submitted that provides an update in the additional comments portion of the report detailing this information. Once complete information is available, e.g. the SSO has ceased, an additional report will be submitted to ADEQ via the online reporting form.



ADEQ
ARKANSAS
Department of Environmental Quality

We protect, enhance and restore the natural environment for the well-being of all Arkansans.

Becky Keogh, Director
5301 Northshore Drive
North Little Rock, AR 72118-5317
(501) 682-0744

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Water

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Who We Are

Information

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Regulations
Reports, Publications &
Online Databases
TMDLs
Water Quality
Standards Review

Branches

Enforcement
Wastewater
Licensing
Inspection
Permits
Water Qual Planning
TMDLs

Sections

No-Discharge Permits
Individual Permits
General Permits
UIC Program
Subsurface
Wastewater
Disposal
Individual Permits
Discharge Permits
Pretreatment
General Permits
Stormwater
File a Complaint:
Water Pollution
Staff
Staff Directory
Inspectors
Personnel Charts
Where We Are
Maps/Directions

Sanitary Sewer Overflow (SSO) Online Report (24-hour and Five Days)

NPDES Enforcement Section
Water Division
Richard Healey, Enforcement Manager - (501) 682-0640

Instructions For Using the 24-Hour and Five Days Sanitary Sewer Overflow Report

After the overflow is detected, the online form below must be submitted within 24 hours.

Note: An * indicates a Required Field.

☐ SSO ☐ Bypass ☐ Upset (*You must check at least one of these)

*Facility Permit Number:

*Date Overflow Began:

Date Overflow Ended:

Location:

(Give address, manhole number-if numbered. Include where the overflow went- yard, ditch, stream, storm sewer, building, other).

Type of Overflow

☐ Manhole Overflow
☐ Lift Station Overflow
☐ Main Line Overflow
☐ Service Line Overflow
☐ Other Overflow Type:

(Enter overflow type if not listed)

Volume:

(Give an estimate in gallons)

Impact of SSO Event:

*Facility name:

*Time:

Time:

Cause of Overflow

☐ I & I - Rainfall
☐ Roots
☐ Grease
☐ Debris
☐ Equipment Failure
☐ Construction
☐ Vandalism
☐ Power Failure
☐ Line Failure/Break
☐ Other Cause:

(enter cause if not listed)

Action Taken - Check all that apply
(Short term and long-term action, including clean-up and any plans to remediate I & I).

☐ Machine rodded
☐ Jet-Vac
☐ Hand rodded
☐ Used Generator To Power Pumps/Equipment
☐ Other: Describe

☐ Disinfected and Deodorized
☐ Hydro Cleaned
☐ Spread Lime on Affected Area
☐ Public Notification

Environmental Damage

☐ OEHC - Observed or Evidence of Human Contact

☐ NEAH - No Evidence of Adverse Health/Environmental Impact

☐ OEI - Observed or Evidence of Environmental Impact

☐ EFH - Evidence of Fish Kill

Reported By: Title: Telephone Number:

Additional Comments if Needed:

Email a Copy of This Report to the Email Address:

"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 submitted 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.

NOTE: Click "Submit Now" only ONCE.
It might take 15-30 Seconds to process your information.
You should receive a confirmation number when this process is complete.
Thank you!

Figure 3-1
Sample SSO Online Report

3.1.3 Reporting Procedures if Online Reporting Form is Unavailable

In instances where the ADEQ online reporting system is not available, the City shall meet the immediate reporting requirement by submission to ADEQ's Enforcement Branch of the Water Division by facsimile using a printed version of ADEQ's online report form, or a form which presents the ADEQ required information in essentially the same format. The completed form should be faxed to (501) 682-0880.

In instances where the ADEQ online reporting and ADEQ facsimile reporting are not available, the City shall report to ADEQ's Enforcement Branch of the Water Division on or before the next business day by telephone at (501) 682-0640.

Enforcement Branch Manager
Water Division
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317
Phone: (501) 682-0640
Fax: (501) 682-0880

3.2 Monthly Discharge Monitoring Reports (DMRs)

The Discharge Monitoring Reports (DMRs), submitted by the authorized signatory or his/her designee, are required monthly to ensure compliance with permits and regulations. With the City's Monthly DMRs, a printed copy of all SSO Reports will be submitted to ADEQ for that reporting period. This submittal will serve as a dual submittal to ADEQ, NPDES Enforcement Section, Water Division and 6EN-WC-Water Enforcement Branch of EPA, to meet the submittal requirements outlined in the Consent Decree.

3.3 Annual Reporting

The City of Fort Smith shall prepare and submit to the EPA and ADEQ, in accordance with the Consent Decree, an Annual Report documenting its compliance activities for each Calendar Year. Information to be included in the Annual Report will be compiled from the data gathered during each individual SSO report.

The Annual Report shall include a tabulation of SSOs which occurred in the Annual Report Year including, but not limited to:

- a. The location of the SSO by the asset identification number, street address, and/or other appropriate location identifiers, such as latitude and longitude or geographic description. For an SSO on Private Property, both the street address and the asset identification number for the nearest manhole should be used.
- a. Name of the receiving water (stream, lake, wetland, etc.), if any
- b. Date and time the SSO started
- c. Date and time the SSO ceased

- d. Estimate of the volume (in gallons) of wastewater released
- e. Identification of the WCTS component from which the SSO was released, including, but not limited to, manhole, lift station, main line, or service line.
- f. An explanation of the potential impact of the SSOs, if any, on public health and/or water quality in the receiving water body;
- g. Cause(s) or suspected cause(s) of the SSO;
- h. Steps taken to respond to the SSO;
- i. Steps taken to reduce, eliminate, and/or prevent recurrence of the SSO, including WCTS investigations;
- j. Copies of all SSO notifications sent to the public or other agencies or departments, as warranted; and
- k. If an SSO is a Recurring SSO, the following additional information shall be reported:
 - i. The dates within the previous three (3) Calendar Years that other SSOs occurred at this location;
 - ii. The previous steps taken, if any, to reduce, eliminate, and/or prevent a recurrence of SSOs at this location; and
 - iii. The additional steps that City shall take to eliminate future SSOs from this location.

Section 4

Record Keeping and Reporting

4.1 SSO Records

As required by the Consent Decree, records related to SSOs will be saved in the City'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 Information Management System (IMS), as described in Article Seven, Paragraph 50 of the Consent Decree, will be submitted to EPA for approval within twenty-four (24) months of the Date of Lodging (i.e., by December 31, 2016).

4.2 Reporting

This SSO Documentation and Reporting Program Plan describes reporting requirements related to SSOs.

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 City's employees. The City's CTP plan will be submitted to EPA for approval within eighteen (18) months of the Date of Lodging (i.e., by July 1, 2016). The CTP will be directly related to the operation and maintenance of the WCTS for the purpose of responding to and preventing SSOs.

5.2 Standard Operating Procedures (SOPs)

Although the City does not anticipate developing SOPs specifically related to the SSO Documentation and Reporting Program, the plan and schedule for developing SOPs for general operation and maintenance of all components of the WCTS will be detailed in a report submitted to EPA within eighteen (18) months of the Date of Lodging (i.e., by July 1, 2016) per the Consent Decree.