

January 9, 2019

Ms. Leslie Allen-Daniel, Enforcement Analyst
Water Division Enforcement Branch
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, AR 72118-5317

RE: NPDES Permit No. AR0041335, AFIN 60-00543
CAP for Sanitary Sewer Overflows (SSOs) Annual Progress Report

Dear Ms. Allen-Daniel:

The following is our annual progress report due January 10, 2019 detailing the corrective actions performed in the past year (2018), and those scheduled for 2019 to reduce SSOs.

Corrective Actions Performed in 2018

Our system, along with the system owned and maintained by the Little Rock Air Force Base (LRAFB), experienced forty-one (41) SSOs in 2018. Thirty (30) of these were in the City of Jacksonville and eleven (11) were in the system owned and maintained by the LRAFB. An itemized list of SSOs, causes, and corrective actions is provided on pages 2-5 of this report.

The increase in SSOs is mainly attributed to the rainfall in 2018, which exceeded the average significantly in Central Arkansas. The National Weather Service in North Little Rock recorded rainfall totals of 71.41 inches in Little Rock, the fourth-highest rainfall total since 1874. The yearly average rainfall is 49.75 inches based on a 30-year average. The highest monthly rainfall fell in February (14" at Adams Field), followed by periods of prolonged rainfall events in September, October, November, and December.

Some of the SSOs were caused by grease or debris blockages. JWWU sent 447 "Can the Grease" and "Shut the Lid on Wipes" letters or post cards to residents during 2018 to educate and encourage proper disposal of grease and non-dispersibles.

In 2018, JWWU spent \$501,792 for contracted pipebursting (PB) by outside forces, and \$685,538 from our expense budget for our collection system personnel/labor, overhead, equipment, and supplies used toward rehabilitation performed by in-house crews. In addition, \$563,428 was expensed for our Technical Services department, which provides investigative televising, smoke testing, trouble-shooting, and routine and emergency cleaning to the collection system.

In 2018, JWWU performed rehabilitation and/or replacement of 8,530 feet of mainline. That total includes 6,537 feet replaced by contracted pipebursting and 1,993 feet repaired or relaid by in-house crews. In addition, 90 manholes were repaired or replaced.

JWWU continues to operate a daily cleaning, televising, and investigative program. Our system is routinely cleaned daily with system-wide cleaning obtained on a three-year basis, with special attention given to problem areas. It is our policy to follow-up on every customer call received by investigating the source of the problem through closed-circuit-televising and other means. The line is cleaned, televised, and if necessary assigned for rehab based on priority.

Our crews cleaned 48.58 miles, televised 8.77 miles and smoke tested 3,943 feet of sewer line in our investigations and through daily routine maintenance.

Our service line repair policy, enforced by City Ordinance #1360, requires homeowners to repair faulty services lines to eliminate inflow/infiltration into the system. In 2018, homeowners repaired 76 service lines, either at our request or by the homeowner's self-initiative.

Itemized SSO Causes and Corrective Actions for 2018

Total: 41 total

JWWU: 30 (3 grease, 6 roots & debris, 18 wet-weather, and 3 other)

LRAFB: 11 (1 grease, 5 line failures, and 5 Wet Weather)

PB=pipe burst ML=main line

Date	Address	MH #	Cause	Corrective Action
1/2/18	LRAFB-4159 Arnold Drive.	LRAFB	Grease/Debris	Hydro Cleaned. Military housing residents were educated regarding disposal of hygiene products to the sanitary sewer.
1/9/18	LRAFB-585 Chief Williams Drive.	LRAFB	Line Failure	This was result of contractor error. Contractor left potable water line valve open near unfinished manhole resulting in the SSO.
2/21/18	203 Concord Drive.	68E23	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/21/18	2048 Loop Road.	82I23	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/21/18	1412 S. Bailey.	103B84	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/21/18	401 Municipal Drive.	89A77	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab

2/21/18	LRAFB-Golf Course.	LRAFB	Rain. 15" within an 8 day period.	Project 1054649 is awaiting funding to inspect all sewer mains and manholes not replaced in the last 10 years. Once completed, projects will be programmed to address the root causes.
2/21/18	LRAFB-RV Park.	LRAFB	Rain. 15" within an 8 day period.	New lift station and sewer expansion project completed. Expansion addresses SSO concern in this area.
2/22/18	401 Municipal Drive.	89A77	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/22/18	1200 Vine Street.	78A68	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/22/18	Military/Southeastern Avenue.	117H1	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/23/18	LRAFB-Golf Course.	LRAFB	Rain. 15" within an 8 day period.	Project 1054649 is awaiting funding to inspect all sewer mains and manholes not replaced in the last 10 years. Once completed, projects will be programmed to address the root causes.
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2/23/18	401 Municipal Drive.	89A77	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/24/18	401 Municipal Drive.	89A77	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/25/18	Military/Southeastern Avenue.	117H1	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
2/28/18	1213 Eastview Drive.	103B30	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab

2/28/18	401 Municipal Drive.	89A77	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
3/1/18	1213 Eastview Drive.	103B30	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
3/1/18	109 Oxford Cove.	68E27	Rain. 15" within an 8 day period.	Smoke Tested/Flow Monitored/Planned Rehab
3/1/18	LRAFB-Golf Course.	LRAFB	Rain. 15" within an 8 day period.	Project 1054649 is awaiting funding to inspect all sewer mains and manholes not replaced in the last 10 years. Once completed, projects will be programmed to address the root causes.
3/12/18	8 Michelle Lane.	105H56	Debris	Hydro-cleaned. Mailed Non-Dispersible letters to upstream customers
4/4/18	LRAFB-Training Area.	LRAFB	Line Failure	Project NKAK12-1009 addresses this SSO. Replaces aging sewer line. Expected date of completion is January 2019.
4/6/18	3026 S. Highway 161.	114H17	Roots	Hydro-cleaned. Pipeburst on 5/15/18.
4/11/18	LRAFB-Building 125.	LRAFB	Line Failure	Project 1054649 is awaiting funding to inspect all sewer mains and manholes not replaced in the last 10 years. Once completed, projects will be programmed to address the root causes.
4/14/18	Oakhurst and Hill Street.	78A9	Debris	Hydro-cleaned. Pipeburst on 5/24/18.
4/27/18	831 Jane Drive.	92C44	Grease	Hydro-cleaned. JWWU relayed mainline 92C45-92C46 on 5/29/18 that caused SSO.
4/27/18	LRAFB-Building 248.	LRAFB	Line Failure	Project 1054649 is awaiting funding to inspect all sewer mains and manholes not replaced in the last 10 years. Once completed, projects will be programmed to address the root causes.
5/7/18	110 Red Wing Court.	85A6	Roots	JWWU removed roots and repaired manhole 5/16/18
5/30/18	Base Meadows Pump Station	Pump Station	Equipment Failure/SCADA	JWWU replaced phase monitor and updated SCADA telemetry to cell tower use.

6/9/18	136 Pike Avenue	92C68	Grease	Hydro-cleaned. Mailed Grease Letters to upstream customers.
8/15/18	2701 North JP Wright Loop	East Pump Station Force main	Stainless Steel tapping saddle broke loose.	JWWU repaired force main on 8/15/18.
9/29/18	107 Franklin Street	82132	Grease	Hydro-cleaned. Sent Grease letter to upstream customers. To be pipeburst in 2019.
10/1/18	1306 Southern Street	93176	Roots	Hydro-cleaned. JWWU made spot repair on 10/8/18. Full line will be pipeburst in 2019.
10/16/18	2110 John Harden Drive.	55E21	Equipment Failure.	6" rubber plug came loose and blocked mainline. JWWU removed plug on 10/16/18.
10/17/18	LRAFB-1585 Lachmund Drive	LRAFB	Line Failure	Plans to upgrade SCADA system on lift station. This will allow remote shutdown to reduce or eliminate SSOs caused by this error.
12/14/18	11 Del Tera	86A15	Line Failure	Work order for repair in 2019
12/14/18	400 T.P White	78A85	5.5" of rain in 24 hour period	Smoke Tested/Flow Monitored/Planned Rehab

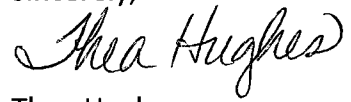
Corrective Actions Planned for 2019

All 2018 wet weather SSOs will be further investigated and assigned for rehab in 2019 based on priority. JWWU has budgeted \$500,000 toward pipebursting contracted by outside forces for 2019. There is currently 6,144 feet of mainline identified and scheduled for pipeburst in 2019.

Plans for 2019 also include 1,035 feet of main line, which has been identified for replacement by in-house crews, along with repair/replace of twenty-five (25) manholes currently identified. Other lines and manholes will be added as the need arises throughout the year based on our on-going investigative work. Our 2019 expense budgets for our Collection Systems department is \$763,044 and our Technical Services department is \$563,389, plus \$65,000 for a new LETS camera to be used in investigation. This will allow JWWU to continue to provide routine cleaning, televising, and investigative work, and make repairs and relay lines as necessary within our budget.

This report provides information concerning corrective actions performed in 2018 and corrective actions planned for 2019. If you need further clarification or more information, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink that reads "Thea Hughes". The signature is written in a cursive, flowing style.

Thea Hughes
General Manager

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