

ADDENDUM TO CWL CORRECTIVE ACTION PLAN

NPDES # AR0043401 March 28, 2016

- I. This Addendum supplements the SSO Corrective Actions table in Section 3 of the City Water and Light Plant of the City of Jonesboro, AR (CWL) Corrective Action Plan (CAP) submitted to the Arkansas Department of Environmental Quality (ADEQ) on March 28, 2016 as shown in Section II below.

CWL has maintained a longstanding effort in the effective and continuous management, operation, and maintenance of the collection system capacity and performance. This ongoing effort includes recent significant investments in collection system capital improvements and sewer equipment purchases, as well as the current Capacity, Management, Operations, and Maintenance (CMOM) Program development. In fact, CWL has several CMOM programs and processes currently in place and active, including a comprehensive Mainline and Manhole Inspection and Repair Program, Sewer Lateral Repair Program, Root Control Program, and Fats, Oils and Grease (FOG) Management Program.

CWL, for many years, has demonstrated a culture of compliance and a commitment to Sanitary Sewer Overflow (SSO) mitigation. Since 2011, CWL has documented collection system capacity, management, operation and maintenance expenses totaling **\$18.39 million**. These expenditures include funding of an extensive collection system flow study and the development of a system hydraulic model with RJN Group, Inc. Also included is the development of a CMOM, currently in draft form, with CWB Engineers, Inc. and a collection system evaluation with McGoodwin, Williams & Yates, Inc.

- II. Corrective Actions table from Section 3 of the CWL CAP:

Corrective Action	Target Completion Date
Expand Quarterly Grease Interceptor Inspections	April 11, 2016
Begin FOG Outreach to Public Schools	2016/2017 School Year
Expand Residential FOG Outreach	2 nd Quarter 2016
Complete CMOM Document	September 30, 2016
Selection of CMOM Software	December 31, 2016

III. Supplemental information concerning the corrective actions planned with proposed completion dates in Section 3 of the CAP is presented as follows:

Corrective Action	Target Completion Date
Phase I (1st Quarter 2016 thru 4th Quarter 2020)	
<u>Milestone #1</u>	December 31, 2016
<ul style="list-style-type: none"> • RJN Hydraulic Model Stage 3, Alternative Evaluation • MW&Y Preliminary Collection System Evaluation • Evaluation of Lift Station Emergency Power Needs 	
<u>Milestone #2</u>	December 31, 2017
<ul style="list-style-type: none"> • Phase I Capital Improvements Identified <ul style="list-style-type: none"> ○ Contingent on Milestone #1 above, WWTP Hydraulic Capacity Evaluation and WWTP Permit Renewals 	
<u>Milestone #3</u>	December 31, 2018
<ul style="list-style-type: none"> • Root Control Program Refinement 	
<u>Milestone #4</u>	December 31, 2019
<ul style="list-style-type: none"> • Equipment Installation and/or Procedures to Address Emergency Lift Station Operation • FOG Management Program Expansion • Lift Station & Force Main Evaluation & Maintenance Program 	
<u>Milestone #5</u>	December 31, 2020
<ul style="list-style-type: none"> • Phase I Capital Improvements Complete • SSES of 1/3 of the Collection System <ul style="list-style-type: none"> ○ Average of approximately 27 miles per year (6.7% of System) 	
Phase II (1st Quarter 2021 thru 4th Quarter 2025)	
<u>Milestone #1</u>	December 31, 2021
<ul style="list-style-type: none"> • Phase II Capital Improvements Identified 	

Milestone #2

December 31, 2025

- Phase I SSES Resultant Repairs
- Phase II Capital Improvements
- SSES of 1/3 of the Collection System
 - Average of approximately 27 miles per year (6.7% of System)

Phase III (1st Quarter 2026 thru 4th Quarter 2030)

Milestone #1

December 31, 2026

- Phase III Capital Improvements Identified

Milestone #2

December 31, 2030

- Phase II SSES Resultant Repairs
- Phase III Capital Improvements
- SSES of Priority Basins, as Identified
- Complete Implementation of CAP

Note: Design Criteria for Hydraulic Model, Collection System Evaluation, Capital Improvements & SSES is 2 year – 24 hour storm.

- IV. The scheduled date for completion of the CAP is December 31, 2030. Completion of the CAP will confirm achievement and continuance of ongoing proper operation and maintenance of the system. CWL will provide a Progress Report by December 31, 2016 and then every two years thereafter until December 31, 2030, anticipated completion of CAP implementation.
- V. The information in this addendum is provided in good faith and is based on CWL's current knowledge and understanding. CWL agrees with ADEQ that the CAP, including this addendum, should be a living document that will require updates due to unforeseen circumstances and/or information, as well as the long time frame involved. CWL plans to continuously evaluate the milestones identified and modify these if conditions warrant to achieve the CAP goals.