



February 26, 2013

Mr. Craig Uyeda
Water Division Enforcement Branch Manager
NPDES Water Enforcement Branch
Arkansas Department of Environmental Quality
P.O. Box 8913
Little Rock, AR 72219-8913

Re: 2012 Annual Report on the
Collection System Management Program (CSMP)
Little Rock Wastewater
Little Rock, Arkansas
Arkansas Department of Environmental Quality
Consent Administrative Order LIS No. 06-037

Dear Mr. Uyeda:

In a continuing effort to "Go Green," Little Rock Wastewater is pleased to submit the attached 2012 Annual Report on the implementation and effectiveness of the Collection System Management Program in compliance with the Arkansas Department of Environmental Quality Consent Administrative Order LIS No. 06-037 ("CAO") as referred to on Page 7, Paragraph V of the CAO in a CD format. If you are unable to open any document, please do not hesitate to contact me, and LRW will be happy to provide you with a "hard" copy.

Consistent with our previous reports and the discussion in a meeting with ADEQ staff on February 22, 2008, Little Rock Wastewater continues to use this annual report as a communication avenue to update the interim construction dates as the most current project information becomes available. LRW has given updates each year advising ADEQ of the status and progress made with the projects. The schedule of interim construction dates has been updated to include the recommendations of the 2010 System Evaluation and Capacity Assurance Plan (SECAP) Update and the CAO Amendment No. 1 as issued by ADEQ on September 6, 2011. The updated schedule is listed in Section VII of this report titled "Update of the Construction Projects

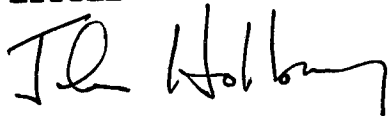
Letter to ADEQ
Re: 2012 Annual CSMP Report
February 26, 2013
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Listed on Page 13 Pursuant to Attachment "B" of the CAO." At the time of submittal of this information, it is the opinion of LRW the revised interim construction dates shall not adversely affect the amended compliance deadline of December 31, 2018 as listed in CAO LIS 06-037-001.

Should you have any questions regarding this submittal, please contact me at 501-688-1416 or e-mail at john.holloway@lrwu.com.

Sincerely,

LITTLE ROCK WASTEWATER



John Holloway, P.E.
Director of Engineering Services

JH/tmw
Enclosure

Cc: Reggie A. Corbitt, P.E., CEO
Little Rock Sanitary Sewer Committee
Little Rock Wastewater Directors
Mayor Mark Stodola
City Manager Bruce Moore
City Attorney Tom Carpenter
City of Little Rock Board of Directors

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
CONSENT ADMINISTRATIVE ORDER
ANNUAL REPORT
FOR 2012

I. INTRODUCTION

By letter dated March 20, 2006, the Arkansas Department of Environmental Quality (“ADEQ”) sent Little Rock Wastewater (“LRW”) CEO, Reggie A. Corbitt, the ADEQ Consent Administrative Order (“CAO”) dated March 9, 2006, with Attachments “A” and “B.” ADEQ specified the annual reporting date for the implementation and effectiveness of the Collection System Management Program (“CSMP”) on February 28 each year in which the CAO remains effective. This report is submitted in compliance with this requirement. The CAO specifies that this report is to indicate which of the construction projects contained in Attachment “B” of the CAO were completed during the year and which projects are scheduled for completion in the coming year.

The CAO also specified that a report containing information about the items in Attachment “A” of the CAO is to be submitted by June 7, 2006, and that report was submitted on that date. Future reporting dates to provide information about whether or not corrective actions taken have achieved goals established for both dry weather overflows (“Non-Capacity SSOs”) and wet weather overflows (“Capacity SSOs”) are due within two weeks of January 1, 2009, and January 1, 2016, respectively.

Little Rock Wastewater received Amendment No. 1 to the CAO LIS 06-037 dated September 6, 2011. Amendment No. 1 extended the compliance deadline to December 31, 2018. A copy is provided in Attachment “G” of this document.

II. IMPLEMENTATION AND EFFECTIVENESS OF THE COLLECTION SYSTEM MANAGEMENT PLAN (“CSMP”)

Little Rock Wastewater (“LRW”) continued its efforts throughout the year 2012 proceeding with the design of major construction projects provided in the 2001 System Evaluation and Capacity Assurance Plan (“SECAP”) and the 2010 SECAP Update. More specifically, the Little Rock Board of Directors granted LRW a rate adjustment that will support funding of projects through 2016, and LRW initiated capacity-related facility projects by procuring the services of consultants for the Mabelvale Pike Peak Flow Attenuation Facility and Cantrell Road Pump Station Projects. With the rate adjustment in place, LRW initiated a revolving loan fund application in the amount of \$36 million that will focus on improvements to the collection system that are designed to mitigate overflows. Also during 2012, LRW developed a service line replacement program targeted at maintaining reliable sewer service to the ratepayers and will also provide the benefit of reducing private sources of inflow which contribute to the cause of capacity related overflows. Implementation of the program will commence in 2013.

All major compliance efforts will be discussed with other activities in the order mentioned, consisting of (III) Projects Update;(IV) Other Compliance Actions; (V) 2012 Non-Capacity Related Sanitary Sewer Overflows; and, (VI) 2012 Capacity Related Overflows and (VII) Project Schedule Update.

III. PROJECTS UPDATE

A. Little Maumelle Wastewater Treatment Facility

Construction of the project was completed in March 2011 and the facility was placed in operation in July 2011.

B. Peak Flow Attenuation Facilities

Construction of the projects was completed in August 2011.

C. Mabelvale Pike Peak Flow Attenuation Facility

The SECAP Update, dated November 2010, identified the need for additional storage to complement the existing storage facility at Scott Hamilton Road. The additional storage, along with a hydraulic upgrade at the Peak Flow Pump Station, will further reduce the surcharge of rainfall dependent inflow and infiltration within the North and South 60 Sewer Interceptors thereby mitigating sanitary sewer overflows within service area for the identified design storm.

The five year forecast prepared in conjunction with the 2013 capital budget allocates project cost of \$1,866,560 in 2013, \$2,345,934 in 2014, \$18,514,888 in 2015, \$23,265,119 in 2016, and \$15,168,369 in 2017.

D. Peak Flow Pump Station – Additional Pump

The Peak Flow Pump Station was designed with a vacant pump position so the capacity of the station could be readily increased when storage becomes available. The increased capacity of the station will reduce the occurrence of sanitary sewer overflows for the design storm event with additional storage along the Mabelvale Pike Corridor or an additional basin at the Peak Flow Attenuation Facility. The additional pump is scheduled to be added in 2017 with a project cost of \$1,203,695.

E. Cantrell Road Pump Station Upgrade

Essentially all sanitary sewerage from the area north of Cantrell Road and east of Pinnacle Valley Road flows through the Rebsamen Interceptor. This interceptor and an area of the city bounded by the Dillard's corporate headquarters to Central High School, to the University of Arkansas Medical Center, back to the Dillard's headquarters - which includes the State Capital Grounds - flows through the Rose Creek sewer basin pipes to the Cantrell Road Pump Station.

The Cantrell Road Pump Station was constructed in 1967 and was modified with bar screens and two dry pit submersible pumps in 1986. Two of the four pumps are original to the station while the other two pumps are replacement pumps that were installed in 1986. A portion of the switch gear is original while some was replaced or added in 1986. All mechanical and electrical components are fully depreciated and due to be replaced. Back-up power generation is being evaluated for this project.

The five year forecast prepared in conjunction with the 2013 capital budget allocates project costs of \$609,897 in 2013, \$5,224,881 in 2014, and \$2,078,450 in 2015.

F. Cantrell Road Pump Station Force Main

The 30-inch force main that conveys flow from the Cantrell Road Pump Station to the River Front Interceptor is a pre-stressed concrete cylinder force main that was installed and placed in service in 1967 and has been in service since. Design life for similar structures can be 50 years. An engineering study of the force main will be performed to assess its existing condition. This project calls for the installation of a new force main and the inspection and rehabilitation of the existing force main after the new main is placed in service.

The five year forecast prepared in conjunction with the 2013 capital budget allocates project costs of \$256,639 in 2013, \$2,513,769 in 2014, and \$377,698 in 2015.

G. Cantrell Road Pump Station In-Line Storage

This four million gallon in-line storage facility will alleviate overflows up to the design storm event generated from wet weather flows in the Jimmerson and Cantrell areas of the City. In addition, this storage facility will allow the pumping capacity at the Cantrell Road Pump Station to remain the same, which is essential to prevent the upsizing of the Riverfront Interceptor from west of downtown to the Adams Field Treatment Facility.

The five year forecast prepared in conjunction with the 2013 capital budget allocates project cost of \$897,323 in 2016, \$8,084,035 in 2017, and \$8,006,165 in 2018.

H. Fourche Creek Wastewater Treatment Facility Hydraulic Upgrade

The hydraulic upgrade of the Arch Street Pump Station from 38 million gallons per day (MGD) to 45 MGD necessitated the hydraulic upgrade of the Fourche Creek Wastewater Treatment Plant to a minimum of 45 MGD. In 2008, LRW, with its consultant CDM, completed a 20-year capital improvement plan (CIP) to assess treatment processes, identify deficiencies, and plan for improvements to the plant to meet future hydraulic and process needs. The overall project was divided into four phases. Phase One was the addition of the new disinfection system, with a project cost of \$9,756,140.97. The disinfection project was completed January 2011. The second phase was the addition of a secondary clarifier, with a project cost of \$ 10,066,644.03, was completed October 2011. With the completion of the second phase, the treatment plant can hydraulically handle 45 MGD. The third phase will address headworks, bioreactor, and primary clarifier with a project cost estimate of \$13,322,092 to be completed in 2017. Phase Four of FCWTF does not include any improvements pertaining to the SECAP. The five-year forecast allocates \$20,890,953 for engineering, construction, administration expenses, contingencies, and plant process improvements. This project is scheduled to be completed in 2021.

I. Rock Creek Storage

A 7 million gallon in-line storage facility is essential to store wet weather flows generated along the Rock Creek Interceptor and the western portion of the City, thereby alleviating overflows up to the design storm event.

The five year forecast prepared in conjunction with the 2013 capital budget allocates project cost of \$439,802 in 2013, \$1,535,585 in 2014, \$10,099,213 in 2015, \$9,998,961 in 2016, and \$4,388,685 in 2017.

J. Adams Field Storage Basin

The SECAP Update, dated November 2010, identified the need for additional storage at the Adams Field Treatment Facility to complement existing and proposed storage facilities (Scott Hamilton and Mabelvale Pike, respectively). The additional storage will allow for extended hydraulic pass-through of rainfall dependent infiltration and inflow volume thereby mitigating sanitary sewer overflows within the service area for the identified design storm.

The five year forecast prepared in conjunction with the 2013 capital budget allocates project cost of \$288,433 in 2015, \$3,070,953 in 2016, \$7,863,778 in 2017, and \$1,827,236 in 2018.

K. Overflow Mitigation Projects

In the late 1980s, LRW was the first municipality in Arkansas to establish a program to address excessive infiltration and inflow (I/I) which leads to sanitary sewer overflows during or following wet weather events. During the 1990s, LRW shifted its focus not only to address excessive I/I within public mains, but to restore capacity to basin outfalls that were undersized for designated wet weather events and labeled this effort as the overflow mitigation program (OMP). The program has reduced the number of overflow points within the city as well as reduced the amount of extraneous rainwater that was treated. LRW will continue this program as evidenced by the following identified future projects and corresponding funding efforts:

1. **Jimmerson Creek (RLF #8)** – Completed in 2010.
2. **Jimmerson West Outfall (RLF #8)** – Completed in 2010.
3. **Jimmerson East and Upper Hinson Manhole Rehab (RLF #8)** – Completed in 2010.
4. **Allsopp South (RLF #8)** – Completed in 2011.
5. **Barton (RLF #8)** – Completed in 2011.
6. **Allsopp North/Country Club (Future Funding)** – The Allsopp North/Country Club project is designed. The Allsopp North/Country Club project is the largest overflow mitigation project the utility has designed to date. The difficulty of this project is further multiplied by the housing density and extensive landscaping in the project area. Application for funding was initiated in 2012.
7. **Allsopp Park Outfall (Future Funding)** - The project is designed and all easements have been procured. Application for funding was initiated in 2012.
8. **Country Club Outfall (Future Funding)** - LRW will construct a new outfall line along the creek from the intersection of Beechwood and Club to the cul-de-sac on

Coffee Pot Lane. The site conditions and the area make this project difficult to construct. Application for funding was initiated in 2012.

9. **Leawood, Echo Valley, and Pleasant Valley (Future Funding)** - The Leawood, Echo Valley, and Pleasant Valley projects are designed. Application for funding was initiated in 2012.

10. **Lower Swaggerty, Granite Mountain, and Sub-basin 30100** - The Lower Swaggerty, Granite Mountain, and Sub-basin 30100 (Bond Street) are designed. Application for funding will be initiated in 2013.

11. **Jimmerson West** - The project was partially constructed in 2011. Application for funding was initiated in 2012 for the remaining collection system rehabilitation.

12. **System Evaluation and Capacity Assurance Plan (SECAP) (RLF #8)** - LRW contracted with RJN Group to conduct the SECAP Update. RJN started the project in the fall of 2009 provided the final report in November 2010. The Update lists multiple projects in addition to the original SECAP which was completed in 2002. The 2002 SECAP resulted in a Capital Improvement Plan to mitigate overflows and bring the wastewater system into compliance with the Consent Administrative Order (CAO) by 2018 and Sierra Club Settlement Agreement by 2018. Many of the projects contained in the original SECAP have been implemented. RJN evaluated the impact of the completed projects and the need for the remaining improvements and/or development of additional alternatives. The objectives of the SECAP Update were to flow monitor the entire sanitary sewer system, update the existing hydraulic model, identify capacity requirements, analyze existing pump stations, analyze equalization basins, analyze wastewater treatment plants, develop improvement projects, budget estimates, recommend infiltration/inflow reduction, and provide a Capital Improvement Plan. RJN provided LRW with the data and analysis previously mentioned in the objectives.

LRW listed the projects in the 2012 budget and scheduled the projects accordingly. The report lists storage facilities, operational adjustments, capacity improvements, and other pertinent items to mitigate overflows. The major projects for the storage facilities are at three sites within the collection system and one site at the Adams Field Wastewater Treatment Facility. The three sites are the Rock Creek Storage, Cantrell Road Storage, and the Mabelvale Pike Facility. The estimated storage for the three facilities is 62 million gallons. The AFWTF storage is estimated at 14 million gallons. The total amount of storage required is 76 million gallons. There are multiple projects listed in the SECAP Update to increase the capacity of existing gravity mains. A large diameter main (42" & 48") proposed from 36th street to Mabelvale Pike is the largest line project required. The Grassy Flat main requires a capacity increase from an 18" main to a 30" mainline. Multiple projects such as manhole adjustments and upsizing of mains was included in the report. The SECAP Update assumed all previous collection system projects would be completed. The following list was included in the 2012 budget.

PROJECT DESCRIPTION		
District 84 OMP	Upper Coleman OMP	District 119 OMP
Leslie Circle Mainline	West Markham Mainline	Roselawn Cemetery Mainline
17 th Street Relay	Fairpark Relay	Bishop St. Relay
Victory Street Relay	Rodney Parham Relay	Markham to Rodney Parham Relay
3I078 to 3L080 42" to 60" – R3	Rebsamen Collector – Murray Park 10090	17 th Street Pipe Burst
Sherrill Heights 11000	3K059 – Diversion–R21	River Ridge P.S. 11200
Rebsamen Collector – Commercial 10050	Rebsamen Collector – Golf Course 10080	Boyle Park Mainline – R24
48" Cross Connection (16K) – R29	Rebsamen Collector – Alltel 10040	Longfellow SB-11400
Rose Creek East OMP	Rose Creek Central OMP	Rose Creek West OMP
Mabelvale OMP	Quapaw North OMP	Walnut Valley OMP
Overlook/Pinnacle Point OMP 10070	Rebsamen Collector –Harbor 10060	Barrow OMP
Foreman Lake OMP	Hall High South OMP	Springer Blvd. Relay – SECAP R1
University Avenue Relay – SECAP R7	Rose Creek East Relay – SECAP R13	Walton Heights – Basin 11600 OMP
Grassy Flat Main – R27	36 th Street to Mabelvale Pike Outfall	Mabelvale Pike (East of University) SB40701
Meadowcliff SB40702	Quapaw South SB20401	Mainline Improvements for Modeled Overflows
Chicot SB40704	Cloverdale SB40703	Upper Country Club Outfall – R19

IV. OTHER COMPLIANCE ACTIONS

A. Signage/Public Notification/Public Information:

As required in the Settlement Agreement, LRW staff developed a Sanitary Sewer Overflow Response Plan (SSORP) which was authorized by the Little Rock Sanitary Sewer Committee on September 18, 2002. The SSO Response Plan, as amended, is included in this document as Attachment A. The plan establishes a protocol for maintenance crews to follow when responding to an SSO event, and specifies internal and regulatory reporting procedures. The SSORP is reviewed and revised annually to ensure all policies, procedures and contacts are accurate. The response protocol includes provisions for temporary signage and posting notices at individual residences. Temporary signage currently used by LRW is shown in Attachment B. A copy of the “door hanger” LRW uses to post residences is provided in Attachment C.

Practically all of the SSO Notification Program requirements contained in the Settlement Agreement are addressed in the SSORP, including the provisions for permanent signage at recurring SSO locations on public property. Locations eligible for permanent signage are in Table A-1 of the SSORP (Attachment A).

An example of permanent signage placed at recurring SSO sites is shown in Attachment D.

V. 2012 NON-CAPACITY RELATED SANITARY SEWER OVERFLOWS

A. Compliance Standard: The Settlement Agreement limits the number of non-capacity related SSOs per 100 miles of sanitary sewer operated and maintained by LRW in LRSSC's collection and treatment system. The Settlement Agreement specifies the following "interim schedule" for non-capacity related SSOs:

Calendar Year	Number of Non-Capacity Related SSOs per 100 Miles of Sewer
2002	12
2003	11
2004	10
2005	9
2006	8
2007	7
2008	6

When LRSSC has reduced non-capacity related SSOs to 6 per 100 miles of sewer mains for two (2) consecutive calendar years, LRSSC shall be deemed to have complied with all provisions of this agreement related to non-capacity related SSOs.

B. Non-Capacity Related SSOs in 2012: There were 57 non-capacity related SSOs reported in 2012. Of the 57 total, three (3) SSOs were related to construction, and five (5) SSOs were related to vandalism. The result was a total of 49 non-capacity related overflows attributed to the operation and maintenance of the LRW collection system. Of the 49 non-capacity related overflows, three (3) SSOs were attributed to debris; one (1) SSO was attributed to equipment failure; ten (10) SSOs were attributed to grease; twenty-two (22) SSOs were attributed to line failures; thirteen (13) SSOs were attributed to roots.[†] A complete listing of non-capacity related SSOs is provided under Attachment E.

C. Compliance Assessment: LRW has reduced the number of non-capacity related sanitary sewer overflows attributed to the operation and maintenance of the collection system owned by CLR to below 6 per 100 miles of sewer lines for nine (9) consecutive calendar years, - 2004 with a total of 42, 2005 with a total of 53, 2006 with a total of 42, 2007 with a total of 46, 2008 with a total of 33, 2009 with a total of 38, 2010 with a total of 39, 2011 with a total of 45, and 2012 with a total of 49. Therefore, under the Settlement terms in Paragraph No. 5, page 10, LRW is deemed to have complied with all provisions of this Settlement related to non-capacity related SSOs.

D. Additional Projects Not Covered By SECAP: In addition to the progress made on SECAP projects during 2012, LRW spent approximately \$1,785,700.00 renewing or replacing structurally deteriorated sewer mains. Old deteriorated sewers are sources of

[†] In March 2007, LRW eliminated the combination of "Roots & Grease" as a code in reporting the cause of an overflow. LRW decided to use either "Roots" or "Grease" to improve reporting and tracking of SSOs.

infiltration/inflow and are prone to blockage, contributing to both the number of capacity and non-capacity SSOs.

In a continued effort to maximize LRW's rehab dollars, LRW treated 54,482 feet of mainline in 2012 with a contracted chemical root removal company with a total cost of \$78,464. Root removal is an important component of LRW's Plan 66 that targets SSO reduction.

LRW personnel completed work on 204 line segments that were in need of point repairs as well as relocated or replaced 9,302 feet of sewer line.

991 feet of sewer line was rehabilitated under the 2012 maintenance contracts for pipe bursting and cured-in-place-pipe (CIPP), for a total cost of \$115,700.00.

In 2012, the Cleaning and Inspection Department Televised 520,659 feet, Hand Cleaned 744,216 feet, Hydro Cleaned 2,163,027 feet, and Line Walked 4,636,567 feet of sewer lines.

VI. 2012 CAPACITY RELATED SANITARY SEWER OVERFLOWS

A. Compliance Standard: The Settlement Agreement requires that capacity related SSOs be eliminated, provided that SSOs may occur without a breach of the Settlement Agreement if rainfall amounts exceed a duration-quantity table that essentially defines a two-year storm event ("qualifying event"). A qualifying event shall occur if any of the twelve permanent rain gauges within the collection system record a two-year storm event. More specific, to that end, the agreement required completion of a study recommending and establishing a time line for specific actions to address capacity related SSOs. The study would serve as the foundation for a long-term compliance program.

B. Capacity Related SSOs in 2012: There were 110 capacity related SSOs reported in 2012 at 87 locations. There were two (2) rain events recorded in 2012 measuring above the Design Storm which resulted in 87 capacity related overflows. The remaining 23 capacity related overflows occurring in 2012, resulted from rain events measuring below the Design Storm threshold. A complete listing of capacity related SSOs is provided under Attachment F.

VII. UPDATE OF THE CONSTRUCTION PROJECTS LISTED ON PAGE 13 PURSUANT TO ATTACHMENT "B" OF THE CAO

The status of all Construction Projects is hereinafter summarized in the table containing the status of the collection system, pump station, and treatment plant projects.

The 2012 annual report revised the estimated completion dates for Leawood, Echo Valley, Pleasant Valley, Granite Mountain Main Line, and Subbasin 30100 Main Line due to the availability of adequate funding. The SECAP update listed some of the existing project and listed some new projects which include storage facilities, treatment facility upgrades, and collection system improvements. LRW received a rate increase in 2012. A conventional bond was approved in 2012 to fund various projects or the design of various projects listed in the SECAP update. An application was submitted to Arkansas Natural Resources Commission (ANRC) in 2012 for multiple collection system projects. LRW staff completed the design of the projects listed in the application to ANRC.

LRW requested and received an extension of the Sierra Club Settlement Agreement and the Consent Administrative Order from the Arkansas Department of Environmental Quality through 2018. The extension was requested by LRW to meet the requirements of the settlement agreement and CAO. LRW is designing and preparing for the construction of the projects listed in the settlement agreement and CAO.

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Activity	Intermediate Completion Date in CAO	Previously Adjusted Intermediate Completion Date	Current Estimated Completion Date	Actual Completion Date	Status as of 1-Feb-12	Status as of 1-Feb-13
Collection System						
District 119 Main Line	31-Dec-05	-	-	10-May-05	Completed	Completed
Coleman Creek Main Line	31-Dec-06	-	-	10-Aug-06	Completed	Completed
System-wide Evaluation	***	-	-	1-Nov-10	Completed	Completed
Jimmerson Creek Main Line	31-Dec-09			10-Jul-09	Completed	Completed
Barrow Addition OMP	31-Dec-09		31-Dec-16		Future	Future
Leawood	31-Dec-10		31-Dec-14		Design	Design
Echo Valley	31-Dec-10	31-Dec-12	31-Dec-14		Design	Design
Pleasant Valley	31-Dec-10	31-Dec-12	31-Dec-14		Design	Design
Hinson**	31-Dec-12			2-Feb-09	Completed	Completed
Barton Main Line	31-Dec-12			29-Jul-10	Completed	Completed
Country Club Main Line	31-Dec-12		31-Dec-14		Design	Design
Allsop Main Line	31-Dec-12		31-Dec-14		Design	Design
Granite Mountain Main Line	31-Dec-12	31-Dec-14	31-Dec-15		Design	Design
Subbasin 30100 Main Line	31-Dec-12	31-Dec-14	31-Dec-15		Design	Design
Upper 72-inch Parallel Line #	31-Dec-13		31-Dec-15		Canceled	Canceled
Rock Creek Main Line #	31-Dec-14		31-Dec-15		Canceled	Canceled
Grassy Flat Main ~	~		31-Dec-13		Design	Design
36th Street to Mabelvale Pike Outfall ~	~		31-Dec-14		Future	Future
Linework to North 60 ~	~		31-Dec-14		Future	Future
Cantrell I/I Reduction ~	~		31-Dec-14		Future	Future
Cantrell Road In-Line Storage ~	~	31-Dec-15	31-Dec-18		Future	Future
Rock Creek Storage ~	~	31-Dec-15	30-Jun-17		Future	Future
Mabelvale Pike Peak Flow Attenuation ~	~	31-Dec-15	30-Sep-17		Future	Design
Adams Field Storage Basin	~	31-Dec-15	30-Sep-18		Future	Future
Pump Stations						
Peak Flow Attenuation Facility	31-Dec-09			5-Dec-09	Completed	Completed
Arch Street PS (45 MGD)	31-Dec-09			6-Aug-11	Completed	Completed
PF Redundant Force Main	31-Dec-09			31-Jan-11	Completed	Completed
Cantrell PS Upgrade & Force Main~	31-Dec-15				Future	Design
Peak Flow Additional Pump ~	~	31-Dec-15	31-Dec-17		Future	Future
Jamison PS Upgrade	~		28-Feb-18		Future	Future
Treatment Plants						
Adams Field WWTP (AR0021806)	31-Dec-06	-	-	16-Mar-07	Completed	Completed
Fourche Creek WWTP (AR0040177)						
Disinfection System	31-Dec-09			9-Jan-11	Completed	Completed
Secondary Clarification	31-Dec-09			27-Oct-11	Completed	Completed
Schedule III	31-Dec-09	25-Jan-12	31-Mar-17		Designed	Designed
Little Maumelle WWTP	31-Dec-09			27-Jan-12	Completed	Completed
** = formerly known as Maumelle Main Line # = Projects deleted due to SECAP update ~ = Projects listed in the SECAP update						

VIII. CONCLUSION

LRW realized continued success in controlling non-capacity related overflows throughout the year of 2012. The established maintenance procedures and schedules continued to provide the desired results by minimizing mainline stoppages within the collection system. In addition, the \$1.785 million dollars of capital invested through the replacement of the aging collection system continued to reduce stoppages related to structural pipe failures. The year of 2012, LRW procured the first of three scheduled rate increases needed to complete approximately \$275 million in capital projects targeted on the wet weather performance of the sewer system. The rate adjusted in 2012 supports a revenue bond and loan that will fund approximately \$60 million in improvements for both facilities (\$26.1 million revenue bond) and collection system (\$36.4 million loan). A rate adjustment will be needed in 2015 to support \$109 million in improvements to both facilities and collection system while a third rate increase will need to be in place by the beginning of 2016 to complete \$103 million of improvements to facilities and collection system.

Looking forward to 2013, LRW intends to focus the majority of our capital dollars towards the design of facilities and the construction of collection system improvement projects listed in the 2010 System Evaluation and Capacity Assurance Plan Update.

ARKANSAS DEPARTMENT OF ENVIRONMENTAL QUALITY
CONSENT ADMINISTRATIVE ORDER
ANNUAL REPORT
FOR 2012

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Little Rock Wastewater
SANITARY SEWER OVERFLOW RESPONSE PLAN
(As Amended January 29, 2013)

I. AUTHORITY

A. National Pollutant Discharge Elimination System (“NPDES”)

NPDES Permit for AFWTF # AR0021806

NPDES Permit for FCWTF # AR0040177

NPDES Permit for LMTP #AR0050849

Issued by Arkansas Department of Environmental Quality (“ADEQ”)

II. GENERAL

The Sanitary Sewer Overflow Response Plan (“SSORP”) is designed to ensure that every report of a confirmed sewage overflow is immediately dispatched to the appropriate crew so that the effects of the overflow can be minimized with respect to impacts to public health, beneficial use, quality of surface waters, and customer service. The SSORP further includes provisions to ensure safety pursuant to the directions provided by ADEQ and that notification and reporting is made to the appropriate local, state, and federal authorities. For purposes of this SSORP, “confirmed sewage spill” is also sometimes referred to as “sewer overflow,” “overflow,” “or sanitary sewer overflow,” (“SSO”). The effective date of this plan is **September 30, 2002**.

A. Objectives

The primary objectives of the SSORP are to protect public health and the environment, to satisfy regulatory agencies and waste discharge permit conditions which address procedures for managing SSOs, and to minimize risk of enforcement actions against Little Rock Wastewater (“LRW”).

Additional objectives of the SSORP are as follows:

- Provide appropriate customer service;
- Protect wastewater treatment plant and collection system personnel;
- Protect the collection system, wastewater treatment facilities, and all appurtenances; and
- Protect private and public property beyond the collection and treatment facilities.

This plan shall not supersede existing emergency plans or standard operating procedures (SOPs) unless directed by the LRW C.E.O.

B. Organization of Plan

The key elements of the SSORP are addressed individually as follows:

Section III	Overflow Response Procedure
Section IV	Public Advisory Procedure
Section V	Regulatory Agency Notification Plan
Section VI	Media Notification Procedure
Section VII	Distribution and Maintenance of SSORP

C. SSO Tracking

A procedure to track the frequency, type, and location of SSOs has been prepared under Appendix A.

Data on each SSO occurrence is maintained in a database that can be analyzed based on any recorded SSO parameter. The database is maintained and backed up on a regular basis by the Technical Service Department.

III. OVERFLOW RESPONSE PROCEDURE

The Overflow Response Procedure presents a strategy for LRW to mobilize labor, materials, tools, and equipment to correct or repair any condition which may cause or contribute to an unpermitted discharge. The plan considers a wide range of potential system failures that could create an overflow to surface waters, land, or buildings.

A. Receipt of Information Regarding an SSO

An SSO may be detected by LRW employees or by others. The Collection System Maintenance (Cleaning and Inspection Section) Dispatcher (or “*Dispatcher*”) is primarily responsible for receiving phone calls from the public of possible SSOs from the wastewater collection system, and for forwarding service requests to the Cleaning and Inspection Crews.

Generally, Dispatchers in the Collection System Maintenance Division receive telephone calls from the public reporting possible SSOs. The emergency phone line is staffed 24 hours per day, every day of the year. The Administration Department has a program in place for educating the public to report SSOs that they observe and to provide the phone number to be called.

1. The Dispatcher (or Emergency Response Crew Leader) obtains all relevant information available regarding the possible overflow including:
 - a. Time and date call was received;
 - b. Specific location;
 - c. Description of problem;
 - d. Time and date overflow was observed;
 - e. Caller’s name and phone number;
 - f. Observations of the caller (e.g., odor, duration, back, or front of property); and
 - g. Other relevant information that will enable the responding Emergency crews to quickly locate, assess and stop the SSO.

Once the SSO has been confirmed by the responding crew the Dispatcher records/inputs the SSO information and creates a service request number for assignment to the Responding crew.

2. Pump station failures are monitored and received by operators on duty at the Adams Field, Fourche Creek, and Little Maumelle Wastewater Treatment Plants. The operator on duty immediately conveys all information regarding alarms to the Superintendent of Facilities and Equipment in order to initiate the investigation. Investigating crew determines if the failure resulted in an overflow and then reports the findings to the Collection System Maintenance Dispatcher if an SSO has occurred. A completed Overflow Report Form shall be sent via e-mail to the Collection System Maintenance Administrator for documentation.
3. SSOs detected by any personnel in the course of their normal duties are reported immediately to the Collection System Maintenance Dispatcher who records all relevant SSO information and dispatches an Emergency crew and additional response crews as needed.
4. Collection System Maintenance Emergency crew or response crew confirms the SSO. Until verified, the report of a possible spill will not be referred to as a “sewer overflow.”

If an overflow has occurred, the crew leader completes the appropriate Overflow Report Form and follows the Sanitary Sewer Overflow Response Tracking Protocol (See Table III-1).

LITTLE ROCK WASTEWATER UTILITY
SANITARY SEWER OVERFLOW OR BYPASS REPORTING FORM
WHEN USING THIS FORM, SEND AN EMAIL WITH THE SSO DATE AND LOCATION TO
Waterenfssso@adeq.state.ar.us WITHIN 24 HOURS!

SERVICE REQUEST NUMBER: _____

REPORTED BY: _____ ADDRESS: _____
 CALL TIME: _____ AM or PM CALL DATE: _____
 (circle one)

RESPONSE DATA:

CREW LEADER: _____
 ARRIVAL TIME: _____ AM or PM DATE: _____
 COMPLETED TIME: _____ AM or PM DATE: _____

ACTION(S) TAKEN: _____ HC = Hydro-cleaned _____ EC = Environmental Cleanup _____ PN = Public Notice
 _____ HR = Hand Rodded _____ EN = Report to Engineering _____ WO = Work Order

SSO DATA:

DATE OF SSO: _____ TIME OF SSO: _____ AM or PM
 (circle one)

LOCATION: _____ ADDRESS: _____

CAUSE: _____ RO = Root _____ D = Debris _____ EF = Equipment Failure
 _____ G = Grease _____ LF = Line Failure
 _____ R = Rainfall _____ HC = Hydrocleaning
 _____ CO = Construction _____ VA = Vandalism

FATE: _____ CR = Creek/Stream/River _____ DI = Ditch _____ DR = Drop Inlet
 _____ GR = Ground Surface _____ PA = Paved Area _____ CB = Contained in Building
 _____ GRCB = Ground Surface & Building

If CR, provide name: _____

ACTIVE DISCHARGE: _____ YES _____ NO (Evidence of Discharge)

OBSERVED FLOWRATE: _____ GALLONS PER MINUTE

ESTIMATED DURATION: _____ MINUTES

ESTIMATED VOLUME: _____ GALLONS

NOTE: If SSO is active when found, the actual volume may be greater than the known volume.

IF "GRCB" IS CHECKED, ESTIMATE GALLONS WITHIN BUILDING: _____

IMPACT: _____ NEAH = No Evidence of Adverse Health or Environmental Impacts
 _____ OEHC = Observed or Evidence of Human Contact
 _____ EFK = Evidence of Fish Kill

LITTLE ROCK WASTEWATER UTILITY
SANITARY SEWER OVERFLOW OR BYPASS REPORTING FORM

SERVICE REQUEST NUMBER: _____

REPORTED BY: _____

ADDRESS: _____

CALL TIME: _____ **AM or PM**
(circle one)

CALL DATE: _____

RESPONSE DATA:

CREW LEADER: _____

ARRIVAL TIME _____ **AM or PM**

DATE: _____

COMPLETED TIME: _____ **AM or PM**

DATE: _____

ACTION(S) TAKEN: _____ **HC** = Hydro-cleaned _____ **EC** = Environmental Cleanup _____ **PN** = Public Notice
_____ **HR** = Hand Rodded _____ **EN** = Report to Engineering _____ **WO** = Work Order

SSO DATA:

DATE OF SSO: _____

TIME OF SSO: _____ **AM or PM**
(circle one)

LOCATION: _____

ADDRESS: _____

CAUSE: _____ **RO** = Root _____ **D** = Debris _____ **EF** = Equipment Failure
_____ **G** = Grease _____ **LF** = Line Failure
_____ **R** = **Rainfall** _____ **HC** = Hydrocleaning
_____ **CO** = Construction _____ **VA** = Vandalism

FATE: _____ **CR** = Creek/Stream/River _____ **DI** = Ditch _____ **DR** = Drop Inlet
_____ **GR** = Ground Surface _____ **PA** = Paved Area _____ **CB** = Contained in Building

If **CR**, provide name _____

ACTIVE DISCHARGE: _____ **YES** _____ **NO** (Evidence of Discharge)

OBSERVED FLOWRATE _____ **GALLONS PER MINUTE**

ESTIMATED DURATION: _____ **MINUTES**

ESTIMATED VOLUME: _____ **GALLONS**

NOTE: If SSO is active when found, the actual volume may be greater than the known volume.

IMPACT: _____ **NEAH** = No Evidence of Adverse Health or Environmental Impacts
_____ **OEHC** = Observed or Evidence of Human Contact
_____ **EFK** = Evidence of Fish Kill

TABLE III-1. SSO RESPONSE TRACKING PROTOCOL

1. Crew that locates overflow fills out Overflow Report Form:
 - a) RED FORMS are used when there is evidence of human contact or environmental impact. When using this form, the responding crew leader shall send an email to waterenfssso@adeq.state.ar.us within 24 hours, stating the date and location of the SSO (as per the revised AFWWTP permit language).
 - b) BLACK FORMS are used when there is no evidence of environmental impact.
2. Crew that locates overflow notifies Area Foreman and Dispatch. Dispatch assigns a service number for tracking.
3. Area Foreman (or Locating Crew) installs warning signs
4. Area Foreman (or Locating Crew) takes photographs *before* cleanup
5. Crew cleans and sanitizes
6. Area Foreman verifies cleanup is done correctly. If within a structure assures photos are taken within the structure, volume is estimated, the Customer Flood Report is properly completed, and contact information for the Program and Events Administrator is provided if applicable (i.e. damage claims).
7. Area Foreman removes warning signs
8. Area Foreman takes photographs *after* cleanup
9. Area Foreman verifies Overflow Report Form is turned into Collection System Maintenance Administrator (Same Day)
10. Collection System Maintenance Administrator downloads photographs into database
11. Collection System Maintenance Administrator enters overflow information into the SSO event database
12. Plant Superintendent reports SSO data to ADEQ and other departments as required by NPDES Permits

B. Dispatch of Appropriate Crews to Site of Sewer Overflow

Failure of any element within the wastewater collection system that threatens to cause or causes an SSO triggers an immediate response to isolate and correct the problem. Crews and equipment are available to respond to any SSO location 24-hours a day. Additional maintenance personnel are designated “on call” in the event that extra crews are needed. Appendix B summarizes the SSO Action Plan.

1. Dispatching Crews

- Dispatchers receive notification of possible SSOs (as outlined in Section III.A entitled “Receipt of Information Regarding an SSO”) and dispatch an Emergency crew or the appropriate Area Foreman as required.
- Dispatchers notify the appropriate Supervisor or Area Foreman by phone or radio regarding SSOs and field crew locations.

2. Crew Instructions and Work Orders

- Responding crews are dispatched by phone or radio. The Maintenance Dispatcher receives instructions from the responding crews or their Supervisors regarding the appropriate crews, materials, supplies, and equipment needed.
- Dispatchers verify that the entire message has been received and acknowledged by the crews who were dispatched. All standard communications procedures are followed. All employees being dispatched to the site of a SSO proceed immediately to the site of the overflow. Any delays or conflicts in assignments are reported immediately to the Supervisor for resolution.
- In all cases response crews report their findings to Area Foreman or Supervisor immediately upon making their investigation, including possible damage to private and public property. If Area Foreman or Supervisor has not received findings from the field crew within 1 hour, Area Foreman or Supervisor contacts the response crew to determine the status of the investigation.

3. Additional Resources

- The Area Foreman or Supervisor receives requests for additional personnel, material, supplies, and equipment

from crews working at the site of a SSO, and conveys the requests to the appropriate parties.

4. Preliminary Assessment of Damage to Private and Public Property

- The focus is to resolve the problem. The response crews use discretion in assisting the property owner/occupant as reasonably as they can. Be aware that LRW could face increased liability for any further damages inflicted to private property during such assistance. In the event the SSO occurs inside a structure, the Programs and Events Administrator shall be notified and shall personally assess and document all damages as well as notify the Supervisor of the event. The response crew shall enter private property for purposes of overflow reporting. NOTE: A Collections System Maintenance Supervisor can take the place of the Programs and Events Administrator in damage assessment activities relating to the time-sensitive information in the case that the Programs and Events Administrator is unable to be on site at that time. In this case, the Collection System Maintenance Supervisor will provide the customer with the Program and Event Administrator's business card. All communication regarding damage claims will take place between the property owner and the Programs and Events Administrator. The crew shall also notify the Area Foreman to take appropriate still photographs, if possible, of the area of the SSO and the impacted area in order to thoroughly document the nature and extent of impact.

5. Field Supervision and Inspection

- The Area Foreman of the responding crew (or whomever confirmed the SSO), visits the site of the SSO, if possible, and takes photos and installs warning signage to ensure that provisions of this Overflow Response Plan and other directives are met.

6. Coordination with Hazardous Material Response

- Upon arrival at the scene of an SSO, should a suspicious substance (e.g., oil sheen, foamy residue) be found on the ground surface, or should a suspicious odor (e.g., gasoline) not common to the sewer system be detected, the responding crew should secure the immediate area and should contact the Dispatcher or Programs and Events

Administrator. **Remember that any vehicle engine, portable pump or open flame (e.g., cigarette lighter) can provide the ignition for an explosion or fire should flammable fluids or vapors be present. Keep a safe distance and observe caution until assistance arrives.**

- Subsequent response actions should follow existing LRW procedures for “DETECTING POTENTIAL EXPLOSIVE OR TOXIC CONDITIONS”. These procedures are detailed in the LRW Safety Manual and attached as Appendix C.
- Only when the Programs and Events Administrator determines it is safe and appropriate for personnel to resume activities can they then proceed under the SSORP with the containment, clean-up activities and correction.

C. Overflow Correction, Containment, and Clean-Up

SSOs of various volumes occur from time to time in spite of concerted prevention efforts. Spills may result from blocked sewer lines, pipe failures, or mechanical malfunctions among other natural or man-made causes. LRW is constantly on alert and ready to respond upon notification and confirmation of an overflow.

This section describes specific actions to be performed by the crews during a SSO.

The objectives of these actions are:

- To protect public health, environment and property from sewage overflows and to restore the surrounding area back to normal as soon as possible;
- To promptly notify the regulatory agency’s communication center of preliminary overflow information and potential impacts;
- To contain the SSO to the maximum extent possible including preventing the discharge of sewage into surface waters; and
- To minimize the LRW exposure to any regulatory agency penalties and fines.

Under most circumstances, LRW handles all response actions with its own maintenance forces. They have the skills and experience to respond rapidly and in the most appropriate manner. An important issue with respect to an emergency response is to ensure that the temporary actions necessary to divert flows and repair the problem do not produce a problem elsewhere in the system. For example, repair of a force main could

require the temporary shutdown of the pump station and diversion of the flow at an upstream location. If the closure is not handled properly, sewage system backups may create other overflows.

Circumstances may arise when LRW could benefit from the support of private-sector construction assistance. This may be true in the case of large diameter pipes buried to depths requiring sheet piling and dewatering should excavation be required. LRW may also choose to use private contractors for open excavation operations that might exceed one day to complete.

1. Responsibilities of Response Crew upon Arrival

It is the responsibility of the initial responding crew that arrives at the site of an SSO to protect the health and safety of the public by mitigating the impact of the SSO to the extent possible. Should the SSO not be the responsibility of LRW, LRW shall notify Little Rock Code Enforcement of the incident.

Upon arrival at an SSO, the initial response crew:

- Determines the cause of the overflow, e.g. sewer line blockage, pump station mechanical or electrical failure, sewer line break, etc.;
- Identifies and requests, if necessary, assistance or additional resources to correct the overflow or to assist in the determination of its cause;
- Takes immediate steps to stop the overflow, e.g. relieves pipeline blockage, manually operates pump station controls, repairs pipe, etc. Extraordinary steps may be considered where overflows from private property threaten public health and safety (e.g., an overflow running off of private property into the public right-of-way); and
- Requests additional personnel, materials, supplies, or equipment that will expedite and minimize the impact of the SSO.

2. Initial Measures for Containment

Measures to contain and / or recover the overflowing sewage are initiated in order to minimize the impact to public health or the environment.

- Determine the immediate destination of the SSO, e.g. storm drain, street curb gutter, body of water, creek bed, etc.;

- Identify and request the necessary materials and equipment to contain or isolate the overflow if not readily available; and
- Take immediate steps to contain the overflow, e.g., block or bag storm drains, recover through vacuum truck, divert into downstream manhole, etc. if conditions allow as determined by LRW Maintenance Department.
- In the event an SSO has discharged into a creek, stream, or river, immediate measures to eliminate and contain the discharge will be taken. Immediate steps to eliminate the SSO discharging into a creek, stream, or river can include the following:
 - Establish bypass pumping of sewer to other areas of the collection system or holding tanks until repairs can be made
 - Utilize equipment that can vacuum sewer to eliminate or contain overflow until repairs can be made

Once corrective action has been taken to restore flow to the collection system, immediate measures will be taken to contain and remove contaminants from the waterway as feasible. The focus is to remove oxygen-depleting solids from water, returning it back into the collection system. Efforts can include the following:

- Establishing strategic points of containment along the waterway and removing contaminants through pumping, vacuuming, sweeping, etc.
- Applying disinfectants as feasible along edges of waterway to eliminate contamination
- Utilize portable aerators as feasible along edges of waterway to maintain adequate oxygen levels in water to preserve aquatic life until proper removal of contaminants is achieved

3. Additional Measures Under Potentially Prolonged Overflow Conditions

In the event of a prolonged sewer line blockage or a sewer line collapse, a portable bypass pumping operation should be set up around the obstruction.

- Take appropriate measures to determine the proper size and number of pumps required to effectively handle the sewage flow.
- Implement continuous or periodic monitoring of the bypass pumping operation as required.
- Address regulatory agency issues in conjunction with emergency repairs.

4. Cleanup

SSO sites are to be thoroughly cleaned after an overflow. No readily identified residue (e.g., sewage solids, papers, rags, plastics, rubber products) is to remain.

- Where practical, thoroughly flush the area and clean of any sewage or wash-down water. Solids and debris are to be flushed, swept, raked, picked-up, and transported for proper disposal.
- Secure the overflow to prevent contact by members of the public until the site has been thoroughly cleaned. If posting is required, refer to Section IV.
- Where appropriate, disinfect and deodorize the overflow site.
- Where sewage has resulted in ponding, pump the pond dry and dispose of the residue in accordance with applicable regulations and policies.
- If a ponded area contains sewage which cannot be pumped dry, it may be treated with bleach. If sewage has discharged into a body of water that may contain fish or other aquatic life, do not use bleach or other appropriate disinfectant and contact the Arkansas Game & Fish Commission for specific instructions.
- Use of portable aerators may be required where complete recovery of sewage is not practical and where severe oxygen depletion in existing surface water is expected.
- Do not use enzymes in flowing creeks, streams, or waterways
- A Collection System Maintenance Supervisor will submit an after-the-fact Short Term Activity Authorization (STAA) after the work is completed for overflows in named creeks/streams/rivers.

D. Overflow Report

Emergency crew or response crew completes an Overflow Report Form (See Figure III-1). Emergency crew or response crew promptly notifies Dispatcher when the SSO is eliminated. Information regarding the SSO includes the following:

- Indication that the SSO reached surface waters, i.e., all SSOs where sewage was observed running to surface waters, or where there was obvious indication (e.g. sewage residue) that sewage flowed to surface waters.
- Indication that the SSO reached and discharged without containment into a storm drain, ditch, drop inlet, or catch basin. If the overflow was contained in a named creek/stream/river, the name of the waterway must be supplied or, if the waterway is not a named waterway, the fate should be logged as "ditch."
- Indication that the SSO had not reached surface waters. Guidance in characterizing these overflows includes:
 - a. SSO to covered storm drains (with no public access) where personnel verify, by inspection, that the entire volume is contained in a sump or impoundment and where complete clean up occurs leaving no residue.
 - b. Preplanned or emergency maintenance jobs involving bypass pumping if access by the public to a bypass channel is restricted and subsequent complete clean up occurs leaving no residue. Any preplanned bypass under these circumstances will not be considered an overflow; and
 - c. SSOs where observation or on-site evidence clearly indicates that all sewage was retained on land and did not reach surface water and where complete cleanup occurs leaving no residue.
- Determine the start time of the SSO by one of the following methods:
 - a. Date and time the information was received and/or reported to have begun and later substantiated by the Emergency crew or response crew: See below for how the time of the SSO is determined:
 - Capacity-Related Overflows:
 1. An email is received by Collection System Maintenance from Engineering personnel, confirming that a category (A, B, C,) rain event has occurred and also stating at what time it became a category (A, B, C) rain event.

2. Collection System Maintenance personnel reviews LRW Operations rainfall data (based upon minute-by-minute data from Little Rock rain gauge locations) to determine the time that the rain began to diminish.
3. From this data, Collection System Maintenance personnel determines the TIME OF SSO by choosing a time that is approximately one (1) hour after the rain began to diminish, thus allowing the water to begin seeping into the ground and into the LRW Collection System.
4. The determined TIME OF SSO is sent to all Area Foremen/Walking Line Crews via email (and is also communicated to Dispatchers)
5. The determined TIME OF SSO is consistently used by all Area Foremen/Walking Line crews/Response Crews on the LRW Overflow Report Form in the *Date of SSO* and *Time of SSO* fields for each SSO found that is related to the corresponding rain event.

- Non-Capacity Related Overflows:

1. The TIME OF SSO is when the response crew arrives on site and confirms that the reported sewage spill is an actual overflow. Thus, the *Time of SSO* and the *Start Time* will be identical and will be recorded as such in the Hansen database system as well as on the LRW Overflow Report Form.

b. Visual observation; or

c. Pump station and lift station flow charts and other recorded data.

- Determine of the stop time of the SSO by one of the following methods:

a. When the blockage is cleared or flow is controlled or contained; or

b. The arrival time of the Emergency crew or response crew, if the SSO stopped between the time it was reported and the time of arrival.

- Visual observations

An estimation of the rate of SSO in gallons per minute (GPM) by one of the following criteria

- a. Direct observation of the overflow. See Appendix D for guidance on estimating sewer overflow rates.
 - b. Measurement of actual overflow from the sewer main.
- Determination of the volume of the SSO:
 - a. When the rate of the overflow is known, multiply the duration of the overflow by the overflow rate; or
 - b. When the rate of the overflow is not known, investigate the surrounding area for evidence of ponding or other indications of overflow volume.
- Photographs of the event, before and after cleanup, when possible.
- Assessment of any damage to the exterior areas of public/private property: Personnel shall enter private property for purposes of estimating determining SSO volume.

E. Customer Satisfaction

When a “fishkill/human contact” SSO is reported, the Hansen database automatically notifies the Administration Department when all SSO information is entered into the database. The Administration Department will then contact the reporting citizen and discuss the actions taken and the problem resolution. If the resident wants to make a claim for damages incurred, the Administration Department informs the resident of LRW’s damage claim process. When a “non-fishkill” SSO occurs, the Administration Department is notified and, if necessary, takes any follow up action required (i.e. notify media or residents affected).

IV. PUBLIC ADVISORY PROCEDURE

This section describes the actions LRW takes, in cooperation with ADEQ and the Arkansas Department of Health to limit public access to areas potentially impacted by unpermitted discharges of pollutants to surface water bodies from the wastewater collection system. Temporary and permanent public notices will be provided as indicated below. A sample of both notices is provided in Appendix E.

A. Temporary Public Notice for Polluted Surface Water Bodies or Ground Surfaces that Result from Uncontrolled Wastewater Discharges from LRW Facilities

LRW has the primary responsibility for determining when to post notices of polluted surface water bodies or ground surfaces that result from uncontrolled wastewater discharges from its facilities. The postings do not necessarily prohibit use of recreational areas, unless posted otherwise, but provide a warning of potential public health risks due to sewage contamination.

Table IV-1 outlines the decision process to recommend to the CEO that posting of a confirmed SSO be undertaken or that there is reasonable potential for an SSO to occur, thus the need to post in advance. If posting is deemed necessary, ADEQ shall be notified.

B. Permanent Public Notice

LRW shall place a permanent notice at manholes located on City-owned property that may experience SSOs more than once in any twelve-month period. A list of applicable manholes has been provided in Appendix A, Table A-1.

Table IV-1

Decision Process to Post Temporary Signage for Polluted Surface Water Bodies or Ground Surfaces that Result from Uncontrolled Wastewater Discharges from LRW Facilities

Category	Step	Event
Reported Overflow	1	Collection System Maintenance Division Supervisor or Response Crew confirms that the SSO that is not posted has resulted in ponded wastewater (ground surface or ditch ponding) or direct discharge to body-contact recreational waters between May 1st and September 30th.
	2	Collection System Maintenance Division Supervisor notifies Director of Engineering Services Division and provides relevant SSO information. <ul style="list-style-type: none"> a) SSO Location b) Remedial actions being taken
	3	Director of Engineering Services dispatches investigator to consult with Maintenance Division on remedial actions and need and extent of posting
	4	Dispatched Investigator notifies Director of Engineering & Collection System Maintenance Division of assessment and makes recommendation on posting
	5	Director of Engineering consults CEO for final decision on posting
	6	If CEO decides posting is required, CEO directs Collection System Maintenance Division to post warning sign(s) and notifies the Director of Administration of intent to post and location
	7	Warning sign(s) is/are posted by Collection System Maintenance Division
Potential Overflow	1	Reasonable potential for SSO that will result in ponded wastewater (ground surface or ditch ponding) or direct discharge to body-contact recreational waters between May 1st and September 30th identified.
	2	Director of the Division identifying potential SSO consults with CEO for final decision on posting
	3	If CEO decides posting is required, CEO directs Collection System Maintenance Division to post warning signs and notifies the Director of Administration of intent to post and location
	4	Warning sign(s) is/are posted by Collection System Maintenance Division

C. Other Public Notification

If the CEO determines additional public notification is needed, the Community Relations Department will make said notifications under the CEO's direction.

V. REGULATORY AGENCY NOTIFICATION PLAN

The Regulatory Agency Notification Plan establishes procedures that LRW follows to provide formal notice to ADEQ as necessary in the event of SSOs. The reporting criteria that are listed below explain to whom various forms of notification should be made and also provides those agencies/individuals to be contacted.

Agency notifications will be performed in parallel with other internal notifications. The procedures for providing notification to the media of an SSO are presented in Section VI - Media Notification Procedure. Internal notification and mobilization of personnel are detailed in Section III - Overflow Response Procedure.

A. Immediate Notification

Upon data entry of a SSO event, an automated electronic event notification is sent to the Adams Fields Plant Operations Superintendent. The Adams Field Plant Superintendent then notifies and reports the SSO to ADEQ in compliance with LRW's Adams Field's NPDES Permit. For convenience, the applicable NPDES Permit reporting requirements are reprinted below.

“The permittee shall report all overflows with the Discharge Monitoring Report (DMR) submittal. These reports shall be summarized and reported in tabular format. The summaries shall include: The date, time, duration, location, estimated volume, and cause of overflow; observed environmental impacts from the overflow; action taken to address the overflow; and ultimate discharge location if not contained (e.g. storm sewer system, ditch, tributary). Overflows, which endanger health or the environment, shall be orally reported to this department (Enforcement Section of Water Division) within 24 hours from the time the permittee becomes aware of the circumstance. A written report of overflows which endanger health or the environment shall be provided within 5 days of the time the permittee becomes aware of the circumstance.”

The Operations Secretary is responsible for meeting the 24-hour oral, fax, or online notification requirement. The name, mailing address, e-mail address, and telephone number for LRW's primary ADEQ contact is provided below:

Marilyn Stout
ADEQ Enforcement Coordinator
Arkansas Department of Environmental Quality
5301 Northshore Drive
North Little Rock, Arkansas 72218
Telephone: 501.682.0649
Email: stout@adeq.state.ar.us

B. Secondary Notifications

After those parties identified in Section A. Immediate Notification have been contacted, the Community Relations Department will notify other federal, state, and local agencies, as well as other interested and possibly impacted parties as directed by the CEO.

VI. MEDIA NOTIFICATION PROCEDURE

When an SSO has been confirmed and is a threat to public health, take the following actions, if necessary, to notify the media:

- A. Sewer investigator or response crew verifies overflow and reports back to the Dispatcher.
- B. The Dispatcher informs the EHS Department. The primary contact should be the Environmental Health & Safety Coordinator. Table VI-1 provides contact names and numbers for the Community Relations Department.
- C. After hours and weekend SSOs should also be reported to the EHS Department at the numbers listed in Table VI-1.
- D. All media requests received should be referred to the EHS Department.
- E. The following personnel are authorized to be interviewed by the media and are the designated spokespersons:
 - 1. Reggie Corbitt, P.E., C.E.O.
 - 2. John Jarratt, Director of Administration
 - 3. Michael Kline, Programs and Events Administrator
 - 4. Howell Anderson, Director of Collection System

Table VI-1

Little Rock Wastewater Media Contacts

Contact	Contact Name	Office	Mobile
Primary	John Jarratt, Director of Administration	501.688.1410	501.352.0512
Backup	Michael Kline, Programs and Events Administrator	501.688.1468	501.352.0513

VII. DISTRIBUTION AND MAINTENANCE OF SSORP

Annual updates to the SSORP reflect all changes in policies and procedures as may be required to achieve its objectives.

A. Submittal and Availability of SSORP

Copies of the SSORP and any amendments are distributed to the following departments and functional positions:

Departments

Administration
Engineering
Maintenance
Operations
EAD

Functional positions

C.E.O., Director, Administration
Director, Engineering
Director
Director, Superintendents
Director

All other personnel who may become incidentally involved in responding to overflows should also be familiarized with the SSORP.

B. Review and Update of SSORP

Review the SSORP annually and amend as appropriate. LRW should:

- Update the SSORP with the issuance of a revised or new NPDES permit or state waste discharge permit;
- Conduct annual training sessions with appropriate personnel; and
- Review and update, as needed, the various contact person lists included in the SSORP.

- Along with the submittal of the annual Consent Administrative Order Report, this SSORP document will be updated and submitted as part of the entire report.

C. Practical Resources

There will be laminated pocket guides printed and furnished to all employees that are involved with the SSO Response Plan, which will provide an overview of the of procedures as well as essential phone numbers. There will also be a quick reference for estimating sewer overflow volumes.

D. Training

Each division will be responsible for training their own personnel. The training should include any employee who is involved in or may possibly be involved in the SSO process. These persons are provided a copy of the SSO Response Plan and said plan will be reviewed in depth with them. This training should take place annually or when revisions occur so that all personnel are brought up to date of any changes that may occur. Each division should also review their response efforts at these annual training sessions and should take suggestions to revise procedures. These suggestions will then be submitted to all divisions for review to determine if the revisions are required.

APPENDIX A. Procedure to Track Sanitary Sewer Overflows

The procedure to track the frequency and location of SSOs will be as defined below:

- A. All SSOs will have a work order prepared within our work order database, which currently is Hansen.
- B. SSOs will be defined as capacity: (SOC = Sewer Overflow Capacity) (SOCP = Sewer Overflow Capacity Private/capacity overflow occurring on privately-owned assets) or non-capacity: (SONC = Sewer Overflow Non-Capacity). The definition of a non-capacity will be one that overflows due to an obstruction in the main line, line failure, or equipment failures. The definition of a capacity related overflow is one that has insufficient carrying capacity to handle inflow and/ or infiltration during a storm event. Engineering shall maintain and update a list of capacity related SSOs. Several other codes have been defined as follows: (SONCO = Sewer Overflow Non-Capacity due to vandalism or contractor damage), (SONCP = Sewer Overflow Non-Capacity Private / overflow occurring on a privately owned assets)
- C. The work order will also include the asset number to identify the overflow locations, which will always be the upstream manhole number of the sewer main asset. A service number will also be assigned by Dispatch for tracking all associated activities.
- D. Monthly reports will be prepared providing the number of capacity and non-capacity SSOs.
- E. In addition to work order data, information on all reported SSOs will be maintained in an “event” database. The SSO event database (DMR) has been designed to contain all information required for regulatory reporting. Reports generated from the database will have the capability of pulling SSO locations based upon dates, assets and occurrences within a set time frame.
- F. An initial list of reported capacity related SSOs has been developed for inclusion in the Permanent Signage phase of this SSORP. This list shall be maintained and annually updated as conditions and overflow mitigation efforts work to improve capacity related deficiencies in the collection system. The following list, Table A-1, contains those SSO sites that are to be equipped with permanent signage.

Table A-1

SSOs Eligible for Permanent Signage

SSO Manhole Number	Subbasin Number	Maintenance Crew Area
7E044	11102	HEST
2H017	30040	HWST
4B001	10090	HWST
7E043	11102	HEST
2H018	30040	HWST
7E046	11102	HEST
0D104	31700	HWST
6E024	11102	HEST
5C007	10070	HWST
7E128	11102	HEST
6E023	11102	HEST
2H019	30040	HWST
4B006	10090	HWST
3K058	30700	HCNT
3K059	30700	HCNT
2C026	30501	HSTH
-10-B008	60301	HWST
4B005	10090	HWST
5C002	10090	HWST
6C004	10080	HEST
6E025	11102	HEST

- G. A second list has been developed, and shall be maintained, by Engineering that defines each potential capacity related SSO manhole by its respective Storm Level. Three such levels have been defined for simplicity in tracking the collection system's response to varying rainfall intensities. Storm Level A indicates an event that exceeds one inch of rainfall in a 24-hour period. These SSO manholes are early indicators of the collection system's response to wet weather conditions. The next tier, Level B, are

SSO manholes that have the propensity to trigger when rainfall amounts exceed the one year or greater frequency, i.e. 3.5 inches over a 24-hour period. The last tier, Level C, are SSO manholes that only trigger in excess of a two year frequency storm event, i.e. 4.1 inches over a 24-hour period. Rainfall amounts, recorded by the SCADA network at various stations throughout the collection system, are continuously reported to the SCADA monitoring stations and to individual computers supported by the SCADA viewing software. Engineering shall be responsible for monitoring existing rainfall conditions and notifying Maintenance when Level A, B and Level C have been reached. The following list, Table A-2, provides the known, or suspected, SSO manholes that have the potential to discharge during wet weather events.

Table A-2. Capacity Related SSOs by Storm Level

<u>Storm Level</u>	<u>Status</u>	<u>Manholes</u>	<u>Area</u>	<u>Subarea</u>
A	Active	0G019	31300	HWST
A	Active	0G025	31300	HWST
A	Active	2E080	31100	HWST
A	Active	2E085	31100	HWST
A	Active	2K167	31900	HCNT
A	Active	2Q021	40703	HSTH
A	Active	3K059	30700	HCNT
A	Active	3N005	30501	HSTH
A	Active	4B005	10090	HWST
A	Active	4N013	40030	HSTH
A	Active	4N089	30501	HSTH
A	Active	5C007	10070	HWST
A	Active	6L011	20030	HCNT
A	Active	7K007	20020	HEST
A	Active	7K112	21100	HCNT
A	Active	7K113	21200	HCNT
A	Active	-1B007	11200	HWST
A	Active	-8-A006	60200	HWST
A	Active	-8-B015	60200	HWST
A	Active	-10-B009	60301	HWST
C	Active	0D034	31700	HWST
C	Active	0D104	31700	HWST
C	Active	0D108	31700	HWST
C	Active	0E011	31700	HWST
C	Active	0G015	31300	HWST
C	Active	0G085	31300	HWST
C	Active	0G087	31300	HWST
C	Active	-10-B008	60301	HWST
C	Active	10G059	10902	HEST
C	Active	10I023	10901	HEST
C	Active	10I112	10902	HCNT
C	Active	10J009	20700	HEST
C	Active	10M014	40501	HEST
C	Active	11J053	20402	HEST
C	Active	11K107	20700	HEST

C	Active	13I005	20401	HEST
C	Active	14L026	30200	HEST
C	Active	16H002	10010	HEST
C	Active	1B012	11502	HWST
C	Active	1B018	11502	HWST
C	Active	1G008	30050	HWST
C	Active	1G010	30040	HWST
C	Active	1G087	30060	HWST
C	Active	1G090	30060	HWST
C	Active	2B068	11502	HWST
C	Active	2H017	30040	HWST
C	Active	2H018	30040	HWST
C	Active	2H019	30040	HWST
C	Active	2K143	30700	HCNT
C	Active	2O007	40030	HSTH
C	Active	2O026	30501	HSTH
C	Active	2R026	40703	HSTH
C	Active	3D065	11501	HWST
C	Active	3D108	11501	HWST
C	Active	3I036	30700	HCNT
C	Active	3K058	30700	HCNT
C	Active	3K058	30700	HCNT
C	Active	3K061	30700	HCNT
C	Active	3N004	30501	HSTH
C	Active	3N006	30501	HSTH
C	Active	3N055	30400	HCNT
C	Active	4L013	30300	HCNT
C	Active	4L015	30300	HCNT
C	Active	5O002	10090	HWST
C	Active	5O097	11400	HEST
C	Active	5O097	11400	HEST
C	Active	6O036	11400	HEST
C	Active	6O047	11400	HEST
C	Active	6D103	11102	HEST
C	Active	6E023	11102	HEST
C	Active	6E024	11102	HEST
C	Active	6E025	11102	HEST

C	Active	6G012	21303	HCNT
C	Active	6N008	40701	HSTH
C	Active	6N016	40701	HSTH
C	Active	7E043	11102	HEST
C	Active	7E044	11102	HEST
C	Active	7E046	11102	HEST
C	Active	7E128	11102	HEST
C	Active	-7K001	30502	HCNT
C	Active	-8-A012	60200	HWST
C	Active	-8-A015	60200	HWST
C	Active	8D033	11000	HEST
C	Active	8D034	11000	HEST
C	Active	8E050	11102	HEST
C	Active	9N008	40501	HEST
C	Active	9O001	40501	HEST

The “status” category provides an indication of the confidence level in the potential for this manhole to experience an SSO. “Active” means a confirmed SSO was experienced, “Investigate” means non-verified information has led to the inclusion on this listing and shall require field conformation, while “Pending” indicates a rehabilitation effort has been conducted with field conformation to follow to conclude positive mitigation. “Subbasin” and “Maintenance Crew Work Area (Maint. Area)” categories are for internal Engineering and Maintenance Department tracking and work area assignment.

- H. An annual report will be prepared by Engineering, which shall include a review of all capacity related overflows, as well as determine updates to the two tables above for permanent signage and potential capacity related SSO manholes. These updated capacity related SSO lists shall be included for amendment to this SSORP.

APPENDIX B. SSO ACTION PLAN

Dispatching Crews

Dispatchers receive notification of possible SSOs from two sources – public and internal crews.

Notification during working hours

Dispatchers receive notification of a possible SSO from the public at which time they collect all relevant information as outlined in Section III A, which at this point they dispatch one of our Emergency Crews or Area Foreman to the site to verify if an SSO has occurred. The crew will report findings back to Dispatcher.

The Responding Crew determines if an SSO has occurred and attempts to resolve the problem, then contacts the Area Foreman within 1-hour of being notified by dispatcher. The Area Foreman goes to site and takes photographs before clean-up is started and places warning signage at the site as well as at adjacent homes if required and available. The Area Foreman or Supervisor also verifies that the emergency crew has filled out an Overflow Report Form and that the required information is on form.

Crews at this point start cleanup and sanitize the site. When complete, the crew is to contact the Area Foreman, who will go back to the site and verify that the cleanup is completed, take after photographs, and remove warning signs.

Notification after hours

The emergency crews receive notification of a possible SSO from the public at which time they collect all relevant information as outlined in Section III. A. and then proceed to the location. (Emergency crew leader manages emergency phone after hours.)

The emergency crew determines if an SSO has occurred, attempts to resolve the problem, takes photographs before cleanup and places warning signs at the site as well as at adjacent homes if required. The crew is to fill out an Overflow Report Form and submit it with their paper work at the beginning of the next workday.

The emergency crew then starts clean-up and sanitizes the site, which, when completed, the crew is to take after photographs and remove warning signs.

If the SSO occurred within a structure the Supervisor is to verify that cleanup has been completed and all policies were followed. A site visit is to be performed no later than the first work day after the overflow occurrence. The Programs and Events Administrator will be informed as well to handle any damage claims.

APPENDIX B. SSO ACTION PLAN (continued)

Internal Notification

Personnel in the field who find an SSO are to contact the Dispatcher and provide the relevant information as outlined in Section III. A. The same procedure as shown for public notification under working hours will be used.

Rain events that are one-inch or greater will trigger our crews to investigate possible recurring SSO sites to verify if an overflow has occurred. These crews will be furnished with a list of possible SSO sites (see Table A-2) which has been determined as being locations that have the potential to overflow. The crew will follow the same procedure as outlined under public notification during working hours. When a crew has gone through their list and an SSO was found, they will return to the site to conduct proper cleanup.

Crews will walk lines and open manholes to check for any blockage or surcharged lines before an SSO exists. These crews will use an activity code of CIWALK on their dailies for all segments that they walk. The crew will address all stoppages immediately to restore service and will fill out a hand written work orders for additional follow-up investigation that will be turned in the following workday. A cleaning and TV work order is required on ALL main line sections where stoppages are found and where the work has not been performed during the initial investigation. If the crews find an SSO, they follow the same procedure as shown in the “public notification during working hours” section of this document.

Main line blockages will be cleaned within three (3) working days and a follow-up TV work order is to be completed within an additional two (2) working days. After TV work has been completed, the Collection System Maintenance Supervisor will review the TV video to determine any subsequent appropriate action to prevent re-occurrence.

APPENDIX C. DETECTING POTENTIAL EXPLOSIVE OR TOXIC CONDITIONS

Purpose:

To ensure that all affected LRW employees are notified of potential health or safety hazards in the LRW collection system

Procedures:

The following procedures must be followed when detecting potential health or safety hazards in the LRW collection system:

Step 1

The LRW employee(s) or crew discovering the potential health or safety hazard must notify dispatch (via radio or by calling 223-1509) or the Environmental Health and Safety Department (688-1468 or 688-1466) to report the potential problem.

A. Information included in the report:

1. Name of the employee making the report
2. Street address or location of potential hazard
3. Manhole number (if known)
4. Brief description of findings

B. If the health or safety hazard was reported to dispatch: dispatch should contact the EHS Department and report the above information.

Step 2

Environmental Health & Safety Department will then investigate the report.

Step 3

If the EHS Department confirms the report, EHS will notify dispatch to ALERT all affected field crews via RADIO that the reported area is “Off Limits” until further notified. EHS will notify ALL other affected LRW & CAW department supervisors of the reported area.

Step 4

Dispatch will draft a notice with the location of the ALERTED areas and place a copy on all Safety News Bulletin Boards and backdoors at the LRW Clearwater Complex. Dispatch will also

APPENDIX C. DETECTING POTENTIAL EXPLOSIVE OR TOXIC CONDITIONS

(continued)

forward a copy of the notice to EHS for placement on other Safety News BB's throughout the utility.

Step 5

Environmental Health and Safety will notify CAW dispatch of the Potential Hazardous Area.

Step 6

If the investigation suspects a Natural Gas Leak, EHS will contact Centerpoint Energy to report the situation.

Step 7

Environmental Health and Safety will keep ALL affected LRW & CAW departments informed of the situation and monitor their (Centerpoint Energy) findings.

Step 8

Once the health or safety hazard has been corrected, EHS will perform a follow-up investigation and when NO HAZARDOUS conditions exist, EHS will remove the Safety ALERT and notify all affected departments.

Step 9

If gasoline, solvents, paint, or other foreign material is suspected and the hazardous area is located in an Industrial/Commercial Area, EHS will contact the Environmental Assessment Department (EAD) and transfer the report for further action. 688-1547

Step 10

Industrial investigations resulting from explosive or toxic conditions will be performed by EAD pretreatment staff members using procedures from the pretreatment procedures manual. Findings will be provided to Safety upon completion of the investigation.

After Hours Reporting

If a hazardous atmosphere is detected after normal working hours, the employee must report the area the next working day prior to his/her normal working hours. After this report is made the process will begin with step one.

APPENDIX D. SSO FLOW and VOLUME DETERMINATION

As indicated previously in this SSORP, each SSO that is actively discharging during the investigation phase of this response plan's tasks shall be evaluated for flow and ultimately total volume discharged, each of which is to be included as part of the reporting requirements. The Engineering Department has defined a three tiered flow estimating system that is derived from the reaction of the manhole lid in relation to the flow exiting the collection system. This system is easily field estimated without the need for measuring devices, which in most instances, would fail to achieve a proper signal due to the lack of sufficient depth of flow.

It has been determined that the majority of actively discharging SSOs reported by a response crew would be non-capacity related. Therefore criteria for determining flow should concentrate on these conditions for gravity sewer collection systems. The three-category rating system is outlined below:

➤ **0 – 10 gpm** (gallons per minute)

This rate covers the light discharge experienced in the upper reaches of the collection system, usually with a small number of residential connections. The visual indicator would be a light flow (about the rate of a standard faucet) from around the manhole lid with no visible release of debris or solids and no movement or lifting of the lid itself.

➤ **10 – 100 gpm**

This rate covers the moderate discharge experienced in the lower reaches of the collection system, usually along the larger collector or outfall type sewer mains (typically 10" and larger mains) and in some capacity related SSOs. The visual indicator would be a noticeable flow from around the manhole lid, slight debris or solids release, and a rocking or slight lifting of the manhole lid.

➤ **100 gpm** (greater than 100 gpm)

This rate covers the heavy discharge experienced along the major outfall sewers and larger capacity related SSOs. The visual indicator is the definite release of debris or solids, and the complete lifting or displacement of the manhole lid.

SSO volumes are derived from the above category multiplied by the duration of discharge. If the exact length of discharge is unknown, criteria for determining an estimated time have been established in the Section III.D, Overflow Report.

APPENDIX E

SIGNAGE FOR OVERFLOWS

Temporary Signage

The following language shall be used on signs located on existing SSO sites during cleanup and on notices attached to homes adjacent to SSO sites:

**NOTICE OF
SANITARY SEWER OVERFLOW**

*Please avoid contact with this
sanitary sewer facility due to
the possibility of adverse health effects until cleanup can be completed*

**For Additional Information
Contact 688-1490**

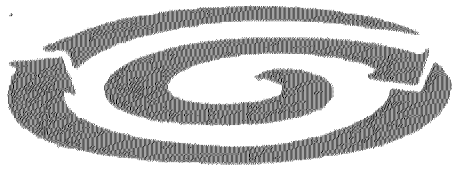
Permanent Signage

The following language shall be used on signs located on potential SSO sites that occur more than once in a twelve-month period:

**NOTICE OF
SANITARY SEWER OVERFLOWS
WHICH MAY OCCUR
AT THIS LOCATION**

*Please avoid contact with this
sanitary sewer facility during an
Overflow condition due to the
possibility of adverse health effects
until cleanup can be completed (reduced the size)*

**For Additional Information
Contact 688-1490**



Little Rock
Wastewater

**NOTICE OF
SANITARY SEWER OVERFLOW**

**Please avoid contact with this
sanitary sewer facility due to
the possibility of adverse health effects
until cleanup can be completed.**

For Additional Information

Contact: 688-1490

NOTICE

Dear Customer:

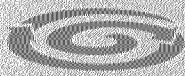
In our increasing efforts to provide you with exceptional service, continue our preventive maintenance program, and eliminate sanitary sewer overflows, our crews are working in your area. We need to gain access to your property to:

- check an existing manhole
- perform routine inspection/maintenance on an existing line or manhole
- grease-related stoppage
- other: _____

SORRY WE MISSED YOU. PLEASE CONTACT US AT YOUR EARLIEST CONVENIENCE.

THANKS

Work Order# _____ Today's Date: _____
Line Segment: _____



**Little Rock
Wastewater**

www.lrwu.com

YOU CAN ALSO HELP ...



Eliminate sanitary sewer overflows by enrolling in Little Rock Wastewater's *Can the Grease* program. This program allows you to receive one grease can and lid, heat-resistant liner, and lots of information - ALL AT NO CHARGE. Upon receiving the grease packet all you have to do is:

1. Place the heat-resistant liner in the grease can.
2. Pour your leftover cooking grease into the bag and put the lid back on the can.
3. Once the bag is full, take it out and toss it in the trash. Place the other liner in the can.

Sign up is easy too. Just fill out the card below with your name, address, and telephone number, then return it to us.

Name: _____

Address: _____

Telephone number: _____

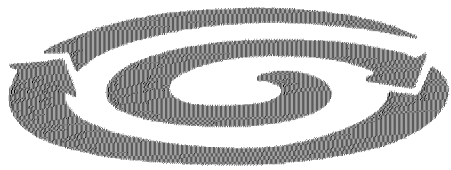
Please return card to Little Rock Wastewater

11 Charvate Drive

Little Rock, AR 72204

501-538-1400

www.lrwu.com



Little Rock
Wastewater

**NOTICE OF
SANITARY SEWER OVERFLOWS
WHICH MAY OCCUR
AT THIS LOCATION**

**Please avoid contact with this
sanitary sewer facility during an
Overflow condition due to the
possibility of adverse health effects
until cleanup can be completed.**

**For Additional Information
Contact: 688-1490**

**LITTLE ROCK WASTEWATER UTILITY
NON-CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

CODE DESCRIPTIONS

NPDES PERMIT

FC - Fourche Creek Treatment Plant
NPDES Permit No. AR0040177

AF - Adams Field Treatment Plant
NPDES Permit No. AR0021806

LM - Little Maumelle Treatment Plant
NPDES Permit No. AR0050849

CAUSE(S) OF SSO

CO - Construction

D - Debris

E - Equipment Failure

G - Res. Grease

GC - Com. Grease

LF - Line Failure

RG - Roots & Grease

RO - Roots

VA - Vandalism

HC - Hydro-Clean

OBSERVED ENVIRONMENTAL IMPACT

NEAH - No Evidence of Adverse Health or Environmental Impacts

OEHC - Observed or Evidence of Human Contact

EFK - Evidence of Fish Kill

ACTION(S) TAKEN

WO - Work Order

EC - Environmental Cleanup

HC - Hydro Cleaned

HR - Hand Rodded

EN - Reporting to Engineering

PN - Public Notification

ULTIMATE DISCHARGE LOC.

CR - Creek/Stream/River

DI - Ditch

DR - Drop Inlet

GR - Ground Surface

PA - Paved Area

CB - Contained in Building

GR/CB - Building and Ground

NPDES PERMIT	LOCATION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	ESTIMATED DURATION, MIN	ESTIMATED VOLUME, GAL	CAUSE OF SSO	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKEN TO ADDRESS SSO	ULTIMATE DISCHARGE LOCATION
AF	3403 DORAL DR	-3C119	01/23/2012	3:00 pm	60	60	VA	NEAH	EC, PN, WO	GR
AF	4 COFFEE POT LN	7D029	02/09/2012	9:00 am	1,440	14,400	VA	NEAH	EC, PN, WO	DI
AF	22 SAINT ANDREWS DR	-3C084	02/16/2012	10:45 am	30	30	VA	NEAH	EC, PN, WO	GR
AF	3221 MARYLAND AVE. (VACANT	8H096	03/12/2012	8:47 am	60	60	CO	NEAH	PN, WO	GR
AF	18201 CANTRELL RD.	-11-A041	03/21/2012	3:15 pm	60	600	VA	NEAH	EC, WO	CR
FC	6117 W 65TH ST	4P024	03/22/2012	2:45 pm	60	180	VA	NEAH	EC, PN, WO	DI
AF	104 S UNIVERSITY AVE	4G084	07/21/2012	8:40 am	120	240	CO	NEAH	EC, EN, PN, WO	PA
AF	KANIS RD. & SHACKLEFORD RD.	-1H002	12/06/2012	10:15 am	60	240	CO	NEAH	EC, PN	PA

COUNT of OTHER OVERFLOWS: 8

AF	4820 COUNTRY CLUB BLVD	6D042	01/01/2012	12:00 pm	60	60	LF	NEAH	EC, EN, PN	GR
AF	36 CHEMIN CT	--15-B040	01/02/2012	5:00 pm	1,380	34,500	LF	NEAH	EC, EN, PN, WO	CR
AF	1016 SHAMROCK DR	3F091	01/03/2012	12:45 pm	60	300	RO	NEAH	EC, PN, WO	GR
AF	7 BELLA VIEW DR. 72212	-5D008	01/05/2012	3:30 pm	150	19,800	LF	NEAH	EC, EN, PN, WO	CR
AF	7 BELLA VW	-5D008	01/22/2012	7:00 pm	2,740	13,700	LF	NEAH	EC, EN, PN, WO	CR
AF	402 CHARBETT DR	3L029	01/27/2012	10:00 am	2	2	LF	NEAH	EC, EN, PN	GR
FC	7 FOXBORO CIR	5P016	02/02/2012	6:00 pm	60	300	RO	NEAH	EC	DI
AF	1904 COUNTRY CLUB LN	7E055	02/09/2012	8:00 am	120	120	LF	NEAH	EC, EN, PN, WO	DI
AF	1911 COUNTRY CLUB LN	7E058	02/09/2012	8:00 am	120	120	LF	NEAH	EC, EN, PN, WO	DI
AF	1921 COUNTRY CLUB LN	7E120	02/09/2012	8:00 am	120	120	LF	NEAH	EC, EN, PN, WO	DI
AF	5708 LEE AVE	5F085	02/27/2012	11:45 am	90	4,500	G	NEAH	EC, PN, WO	CR
FC	6313 GEYER SPRINGS RD	5O016	02/28/2012	1:40 pm	60	180	G	NEAH	EC, PN, WO	PA
FC	5104 BASELINE RD	6R013	03/11/2012	7:53 pm	120	1,200	G	NEAH	EC, PN, WO	GR
AF	36TH ST. & BOYLE PARK	3K062	03/27/2012	9:00 am	300	4,500	LF	NEAH	EC, PN, WO	CR

**LITTLE ROCK WASTEWATER UTILITY
NON-CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

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OBSERVED ENVIRONMENTAL IMPACT

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ACTION(S) TAKEN

WO - Work Order
EC - Environmental Cleanup
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ULTIMATE DISCHARGE LOC.

CR - Creek/Stream/River
DI - Ditch
DR - Drop Inlet
GR - Ground Surface
PA - Paved Area
CB - Contained in Building
GR/CB - Building and Ground

NPDES PERMIT	LOCATION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	ESTIMATED DURATION, MIN	ESTIMATED VOLUME, GAL	CAUSE OF SSO	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKEN TO ADDRESS SSO	ULTIMATE DISCHARGE LOCATION
AF	7801 W 25TH ST	2J058	04/05/2012	11:00 am	120	120	RO	NEAH	EC, PN, WO	DR
AF	36 CHEMIN CT	--15-B040	04/06/2012	3:30 pm	4,320	108,000	LF	OEHC,EFK	EC, EN, PN, WO	CR
AF	14 FAIRMONT DR	4K070	04/14/2012	9:00 am	200	200	G	NEAH	EC, PN, WO	DI
AF	RIVER MOUNTAIN RD	-1A018	04/19/2012	10:00 am	330	660	LF	NEAH	EC, EN, PN, WO	DI
AF	RIVER MOUNTAIN RD.	-1A067	04/23/2012	4:00 pm	1,200	60,000	LF	NEAH	EC, EN, PN, WO	CR
AF	1500 CAULDEN AVE.	3I065	04/26/2012	5:45 pm	60	120	G	NEAH	EC, PN, WO	DI
AF	1500 CAULDEN AVE.	3I066	04/26/2012	5:45 pm	180	1,800	G	NEAH	EC, WO	GR
AF	1500 CAULDEN AVE.	3I067	04/26/2012	5:45 pm	180	540	G	NEAH	EC, WO	GR
AF	24924 CHENAL PKY	LITTLE	05/08/2012	9:00 am	30	60	E	NEAH	EC	GR
FC	13200 CLAY ST	0X042	05/09/2012	5:00 pm	30	30	LF	NEAH	EC, EN, PN, WO	GR
AF	4 CANTRELL RD	7E061	05/17/2012	9:30 am	120	120	LF	NEAH	EC, EN, PN, WO	DI
AF	4400 RIVER MOUNTAIN RD.	-1A064	05/28/2012	8:45 am	200	800	LF	NEAH	EC, EN, PN, WO	CR
AF	4400 RIVER MOUNTAIN RD.	-1A017	05/29/2012	7:15 pm	120	600	LF	NEAH	EC, EN, PN	GR
AF	4400 RIVER MOUNTAIN RD.	-1A018	05/29/2012	7:15 pm	60	300	LF	NEAH	EC, EN, PN, WO	DI
AF	4400 RIVER MOUNTAIN RD.	-1A048	05/29/2012	7:15 pm	120	600	LF	NEAH	EC, EN, PN	GR
AF	5TH ST. & LOUISIANA ST.	12H087	06/11/2012	1:00 pm	60	60	D	NEAH	EC, PN	PA
AF	811 N HUGHES ST	4F046	06/25/2012	3:00 pm	60	60	RO	NEAH	EC, PN, WO	GR
AF	4400 River Mtn Rd.	-1A018	07/03/2012	9:00 am	120	6,000	LF	NEAH	EC, EN, PN	CR
AF	2310 ROMINE RD	0J077	07/13/2012	9:00 am	75	75	RO	NEAH	EC, PN, WO	GR
AF	614 N PALM ST	6F072	07/19/2012	10:00 am	1,805	1,805	G	NEAH	EC, PN, WO	PA
AF	3721 CANTRELL RD	8E060	07/24/2012	9:30 am	60	120	RO	NEAH	EC, PN, WO	GR
AF	2 GRANITE MOUNTAIN CIR	15M039	07/26/2012	8:30 pm	1	1	G	NEAH	EC, PN, WO	GR
FC	13200 CLAY ST	0X042	08/02/2012	1:30 pm	60	120	LF	NEAH	EC, PN, WO	GR
AF	2206 S PARK ST	10J087	08/09/2012	3:30 pm	30	30	G	NEAH	EC, PN, WO	GR

**LITTLE ROCK WASTEWATER UTILITY
NON-CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

CODE DESCRIPTIONS

NPDES PERMIT

FC - Fourche Creek Treatment Plant
NPDES Permit No. AR0040177

AF - Adams Field Treatment Plant
NPDES Permit No. AR0021806

LM - Little Maumelle Treatment Plant
NPDES Permit No. AR0050849

CAUSE(S) OF SSO

CO - Construction
D - Debris
E - Equipment Failure
G - Res. Grease
GC - Com. Grease
LF - Line Failure
RG - Roots & Grease
RO - Roots
VA - Vandalism
HC - Hydro-Clean

OBSERVED ENVIRONMENTAL IMPACT

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

ACTION(S) TAKEN

WO - Work Order
EC - Environmental Cleanup
HC - Hydro Cleaned
HR - Hand Rodded
EN - Reporting to Engineering
PN - Public Notification

ULTIMATE DISCHARGE LOC.

CR - Creek/Stream/River
DI - Ditch
DR - Drop Inlet
GR - Ground Surface
PA - Paved Area
CB - Contained in Building
GR/CB - Building and Ground

NPDES PERMIT	LOCATION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	ESTIMATED DURATION, MIN	ESTIMATED VOLUME, GAL	CAUSE OF SSO	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKEN TO ADDRESS SSO	ULTIMATE DISCHARGE LOCATION
AF	2001 RESERVOIR RD	1E169	08/24/2012	7:15 pm	75	225	RO	NEAH	EC, PN, WO	GR
AF	2001 RESERVOIR RD	1E160	08/24/2012	8:30 pm	30	30	RO	NEAH	EC, PN, WO	GR
AF	7200 RICHWOOD RD	3C144	09/04/2012	5:00 pm	60	120	RO	NEAH	EC, PN, WO	DR
FC	1 MANSFIELD DR	6Q016	09/07/2012	3:30 pm	30	30	RO	NEAH	EC, WO	GR
AF	103 EPERNAY CV	-15-B034	09/21/2012	1:00 pm	60	600	LF	NEAH	EC, EN, PN, WO	DI
AF	2717 BISHOP ST	10K167	09/26/2012	12:00 pm	60	300	RO	NEAH	EC, PN, WO	GR
AF	2 E PALISADES DR	5C012	09/27/2012	8:30 am	180	180	LF	NEAH	EC, EN, PN, WO	GR
AF	5 KERIAN LN	-9D022	10/04/2012	9:00 am	105	525	D	NEAH	EC, PN, WO	DI
AF	301 S UNIVERSITY AVE	4G088	10/10/2012	4:00 pm	60	60	D	NEAH	EC	DR
AF	1201 N GARFIELD ST	4F123	11/09/2012	9:55 am	60	60	RO	NEAH	EC	PA
AF	10720 BAINBRIDGE DR	-1A022	12/12/2012	1:45 pm	120	1,200	RO	NEAH	EC, PN, WO	GR

COUNT of MANHOLE OVERFLOWS: 49

COUNT of NON-CAPACITY OVERFLOWS : 57



Little Rock Wastewater

2012 Non - Capacity Related SSO's

Probable Cause

- Construction
- Debris
- Equipment
- Grease
- Line Failure
- Roots
- Vandalism

There were 57 Non-Capacity Related Overflows in 2012

Cause	Occurrences
Construction	3
Debris	3
Equipment	1
Grease	10
Line Failure	22
Roots	13
Vandalism	5



**LITTLE ROCK WASTEWATER UTILITY
CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

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NPDES Permit No. AR0040177

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NPDES Permit No. AR0050849

CAUSE(S) OF SSO

R - Rainfall

OBSERVED ENVIRONMENTAL IMPACT

NEAH - No Evidence of Adverse Health or Environmental Impacts

OEHC - Observed or Evidence of Human Contact

EFK - Evidence of Fish Kill

ACTION(S) TAKEN

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HC - Hydro Cleaned

HR - Hand Rodded

EN - Reporting to Engineering

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FC	7909 MCDANIEL DR	2Q021	01/10/2012	6:30 pm	60	60	R	NEAH	EC, EN, PN, WO	DI
AF	4701 ASHER AVE	7K007	01/22/2012	7:00 am	60	1,200	R	NEAH	EC, EN, PN, WO	GR
AF	4701 ASHER AVE	7K112	01/22/2012	7:00 am	60	1,200	R	NEAH	EC, EN, PN, WO	GR
AF	4701 ASHER AVE	7K113	01/22/2012	7:00 am	60	1,200	R	NEAH	EC, EN, PN, WO	GR
AF	1401 BISCAYNE DR	2E080	02/04/2012	5:00 am	60	60	R	NEAH	EC, EN, PN, WO	GR
AF	3201 WHITFIELD ST	2K167	02/04/2012	5:00 am	60	300	R	NEAH	EC, EN, PN, WO	CR
AF	3611 MABELVALE PIKE	6L011	02/04/2012	5:00 am	60	1,800	R	NEAH	EC, EN, PN, WO	CR
AF	48 PAMELA DR	2E085	02/04/2012	5:00 am	60	120	R	NEAH	EC, EN, PN, WO	DI
AF	5207 WESTERN HILLS AVE	3N005	02/04/2012	5:00 am	60	180	R	NEAH	EC, EN, PN, WO	CR
FC	5207 WESTERN HILLS AVE	4N013	02/04/2012	5:00 am	60	180	R	NEAH	EC, EN, PN, WO	CR
AF	5207 WESTERN HILLS AVE	4N089	02/04/2012	5:00 am	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	5512 TULLY CV	-8-A006	02/04/2012	5:00 am	60	300	R	NEAH	EC, EN, PN, WO	CR
FC	7909 MCDANIEL DR	2Q021	02/04/2012	5:00 am	60	60	R	NEAH	EC, EN, PN, WO	DI
AF	9820 W MARKHAM ST	0G019	02/04/2012	5:00 am	60	120	R	NEAH	EC, EN, PN, WO	DI
AF	9820 W MARKHAM ST	0G025	02/04/2012	5:00 am	60	120	R	NEAH	EC, EN, PN, WO	DI
AF	MAUMELLE PUMP STA	-8-B015	02/04/2012	5:00 am	60	600	R	NEAH	EC, EN, PN, WO	GR
AF	REBEAMEN PARK RD	4B005	02/04/2012	5:00 am	120	1,200	R	NEAH	EC, EN, PN, WO	GR
AF	REBSAMEN PARK RD	5C007	02/04/2012	5:00 am	60	120	R	NEAH	EC, EN, PN, WO	GR
AF	W 36th & BOYLE PARK RD	3K059	02/04/2012	5:00 am	60	120	R	NEAH	EC, EN, PN, WO	DI
AF	1 WINDY OAKS CT	0G087	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	101 N VAN BUREN ST	6G012	03/21/2012	3:00 pm	300	3,000	R	NEAH	EC, EN, PN, WO	PA
AF	123 BROOKSIDE DR	1G087	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	1301 W ROOSEVELT RD	11K107	03/21/2012	3:00 pm	360	7,200	R	NEAH	EC, EN, PN, WO	GR
AF	1317 W 23RD ST	10J009	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	GR

**LITTLE ROCK WASTEWATER UTILITY
CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

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NPDES Permit No. AR0040177

AF - Adams Field Treatment Plant
NPDES Permit No. AR0021806

LM - Little Maumelle Treatment Plant
NPDES Permit No. AR0050849

CAUSE(S) OF SSO

R - Rainfall

OBSERVED ENVIRONMENTAL IMPACT

NEAH - No Evidence of Adverse Health or Environmental Impacts

OEHC - Observed or Evidence of Human Contact

EFK - Evidence of Fish Kill

ACTION(S) TAKEN

WO - Work Order

EC - Environmental Cleanup

HC - Hydro Cleaned

HR - Hand Rodded

EN - Reporting to Engineering

PN - Public Notification

ULTIMATE DISCHARGE LOC.

CR - Creek/Stream/River

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GR - Ground Surface

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AF	14 BLUE RIDGE CIR	6C036	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN, WO	GR
AF	1401 BISCAYNE DR	2E080	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	14812 GORGEOUS VIEW TRL	-6K011	03/21/2012	3:00 pm	135	675	R	NEAH	EC, EN, PN, WO	CR
FC	16 ROSEMOOR DR	6N008	03/21/2012	3:00 pm	60	180	R	NEAH	EC, EN, PN, WO	GR
AF	1600 BISHOP ST	10I112	03/21/2012	3:00 pm	360	7,200	R	NEAH	EC, EN, PN, WO	PA
AF	1601 WESTPARK DR	3I036	03/21/2012	3:00 pm	195	14,625	R	NEAH	EC, EN, PN, WO	CR
AF	1623 WOLFE ST	10I023	03/21/2012	3:00 pm	360	3,600	R	NEAH	EC, EN, PN, WO	PA
AF	1723 COMMERCE ST	13I005	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	PA
AF	1812 OLD FORGE DR	0E011	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	DI
AF	1900 W 3RD ST	10G059	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN, WO	GR
AF	21ST & CHESTER ST	11J053	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	GR
AF	2215 CLAPBOARD HILL RD	0D034	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	GR
FC	2300 W 60TH ST	10M014	03/21/2012	3:00 pm	120	1,200	R	NEAH	EC, EN, PN, WO	GR
FC	2300 W 60TH ST	9N008	03/21/2012	3:00 pm	120	2,400	R	NEAH	EC, EN, PN, WO	GR
FC	2300 W 60TH ST	9O001	03/21/2012	3:00 pm	120	6,000	R	NEAH	EC, EN, PN, WO	GR
AF	2600 E CAPITOL AVE	16H002	03/21/2012	3:00 pm	450	90,000	R	NEAH	EC, EN, PN, WO	CR
AF	2605 CHARTER OAK DR	0D104	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	2621 CHARTER OAK DR	0D108	03/21/2012	3:00 pm	30	150	R	NEAH	EC, PN, WO	PA
AF	2801 REBSAMEN PARK RD.	8D033	03/21/2012	3:00 pm	120	2,400	R	NEAH	EC, EN	GR
AF	2801 REBSAMEN PARK RD.	8D034	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN	GR
AF	3 BUCKLAND RD	-10-B008	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	3201 WHITFIELD ST	2K167	03/21/2012	3:00 pm	60	60	R	NEAH	EC, EN, PN, WO	CR
AF	3417 WYNNE DR	2K143	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	3600 CANTRELL RD	8E050	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN	DR

**LITTLE ROCK WASTEWATER UTILITY
CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

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FC - Fourche Creek Treatment Plant
NPDES Permit No. AR0040177

AF - Adams Field Treatment Plant
NPDES Permit No. AR0021806

LM - Little Maumelle Treatment Plant
NPDES Permit No. AR0050849

CAUSE(S) OF SSO

R - Rainfall

OBSERVED ENVIRONMENTAL IMPACT

NEAH - No Evidence of Adverse Health or Environmental Impacts

OEHC - Observed or Evidence of Human Contact

EFK - Evidence of Fish Kill

ACTION(S) TAKEN

WO - Work Order

EC - Environmental Cleanup

HC - Hydro Cleaned

HR - Hand Rodded

EN - Reporting to Engineering

PN - Public Notification

ULTIMATE DISCHARGE LOC.

CR - Creek/Stream/River

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GR - Ground Surface

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NPDES PERMIT	LOCATION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	ESTIMATED DURATION, MIN	ESTIMATED VOLUME, GAL	CAUSE OF SSO	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKEN TO ADDRESS SSO	ULTIMATE DISCHARGE LOCATION
AF	3601 MABELVALE PIKE	6L011	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN, WO	CR
AF	37 VISTA DR	-7K001	03/21/2012	3:00 pm	120	120	R	NEAH	EC, EN, PN, WO	CR
AF	3807 FOXCROFT RD	1B012	03/21/2012	3:00 pm	30	750	R	NEAH	EC, EN, PN, WO	CR
AF	3807 FOXCROFT RD	1B018	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	CR
AF	3807 FOXCROFT RD	2B068	03/21/2012	3:00 pm	30	750	R	NEAH	EC, EN, PN, WO	CR
AF	403 BROOKSIDE DR	1G090	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	4400 S UNIVERSITY AVE	4L013	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	CR
AF	4400 S UNIVERSITY AVE	4L015	03/21/2012	3:00 pm	60	180	R	NEAH	EC, EN, PN, WO	CR
AF	4418 S UNIVERSITY AVE	4M007	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	4701 ASHER AVE	7K007	03/21/2012	3:00 pm	450	9,000	R	NEAH	EC, EN, PN, WO	GR
AF	4701 ASHER AVE	7K113	03/21/2012	3:00 pm	450	22,500	R	NEAH	EC, EN, PN, WO	GR
AF	48 PAMELA DR	2E085	03/21/2012	3:00 pm	30	150	R	NEAH	EC, EN, PN, WO	DI
AF	4821 STONEWALL RD	6D103	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN	PA
AF	5207 WESTERN HILLS AVE	3N004	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	5207 WESTERN HILLS AVE	3N005	03/21/2012	3:00 pm	60	180	R	NEAH	EC, EN, PN, WO	CR
AF	5207 WESTERN HILLS AVE	3N006	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	GR
FC	5207 WESTERN HILLS AVE	4N013	03/21/2012	3:00 pm	60	200	R	NEAH	EC, EN, PN, WO	CR
AF	5207 WESTERN HILLS AVE	4N089	03/21/2012	3:00 pm	60	180	R	NEAH	EC, EN, PN, WO	CR
AF	53 ROSEMOOR DR	3N055	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	GR
FC	53 ROSEMOOR DR	6N016	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	DR
AF	5437 S GRANDVIEW ST	5C097	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN, WO	GR
AF	5512 TULLY CV	-8-A006	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	CR
AF	5512 TULLY CV	-8-A012	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	GR
AF	5512 TULLY CV	-8-A015	03/21/2012	3:00 pm	30	30	R	NEAH	EC, EN, PN, WO	GR

**LITTLE ROCK WASTEWATER UTILITY
CAPACITY SANITARY SEWER OVERFLOW REPORT
1/1/2012 - 12/31/2012**

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CAUSE(S) OF SSO

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AF	718 PINE VALLEY RD	3D065	03/21/2012	3:00 pm	30	300	R	NEAH	EN, PN, WO	DI
AF	7500 W 65TH ST	2O026	03/21/2012	3:00 pm	60	240	R	NEAH	EC, EN, PN, WO	CR
FC	7909 MCDANIEL DR	2Q021	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	810 PINE VALLEY RD	3D108	03/21/2012	3:00 pm	30	300	R	NEAH	EN, PN, WO	GR
AF	8610 CUNNINGHAM LAKE RD	1G008	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	PA
AF	8610 CUNNINGHAM LAKE RD	1G010	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	PA
AF	9109 W. MARKHAM	0G085	03/21/2012	3:00 pm	30	30	R	NEAH	EC, EN, PN, WO	PA
FC	9321 INTERSTATE30	2R026	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	9820 W MARKHAM ST	0G015	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	DI
AF	9820 W MARKHAM ST	0G019	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	DI
AF	9820 W MARKHAM ST	0G025	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	DI
AF	ALLSOPP PARK	6E023	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN, WO	GR
AF	ALLSOPP PARK	6E024	03/21/2012	3:00 pm	60	600	R	NEAH	EC, EN, PN, WO	GR
AF	ALLSOPP PARK	6E025	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	GR
AF	ALLSOPP PARK	7E043	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	GR
AF	ALLSOPP PARK	7E044	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	GR
AF	ALLSOPP PARK	7E046	03/21/2012	3:00 pm	60	300	R	NEAH	EC, EN, PN, WO	GR
AF	ALLSOPP PARK	7E128	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	GR
AF	I-440 & SPRINGER BLVD.	14L026	03/21/2012	3:00 pm	240	2,400	R	NEAH	EC, EN, PN, WO	GR
AF	KANIS PARK	2H017	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	GR
AF	KANIS PARK	2H018	03/21/2012	3:00 pm	30	2,250	R	NEAH	EC, EN, PN, WO	GR
AF	KANIS PARK	2H019	03/21/2012	3:00 pm	30	3,000	R	NEAH	EC, EN, PN, WO	GR
AF	KANIS PARK	2H074	03/21/2012	3:00 pm	30	600	R	NEAH	EC, EN, PN, WO	GR
AF	REBSAMEN PARK	4B005	03/21/2012	3:00 pm	30	1,500	R	NEAH	EC, EN, PN, WO	GR

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AF	REBSAMEN PARK	5C002	03/21/2012	3:00 pm	30	300	R	NEAH	EC, EN, PN, WO	GR
AF	REBSAMEN PARK	5C007	03/21/2012	3:00 pm	30	1,500	R	NEAH	EC, EN, PN, WO	GR
AF	REBSAMEN PARK RD.	6C047	03/21/2012	3:00 pm	60	120	R	NEAH	EN, PN	GR
AF	W. 36TH ST. & BOYLE PARK	3K058	03/21/2012	3:00 pm	60	60	R	NEAH	EC, EN, PN, WO	CR
AF	W. 36TH ST. & BOYLE PARK	3K059	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	W. 36TH ST. & BOYLE PARK	3K061	03/21/2012	3:00 pm	60	120	R	NEAH	EC, EN, PN, WO	CR
AF	RIVER RIDGE PUMP STATION	-1B007	04/20/2012	7:30 pm	20	20	R	NEAH	EC, EN, PN	GR
AF	3 BUCKLAND RD	-10-B009	06/04/2012	5:30 pm	10	50	R	NEAH	EC, EN, PN, WO	DI
AF	5512 TULLY CV	-8-A006	08/31/2012	12:30 pm	30	30	R	NEAH	EC, EN, PN	CR
AF	1404 BISCAYNE DR	2E080	09/15/2012	3:00 am	30	150	R	NEAH	EC, EN, PN, WO	GR
AF	810 PINE VALLEY RD	3D108	09/15/2012	3:00 am	30	300	R	NEAH	EC, EN, PN, WO	GR
AF	REBSAMEN PARK	4B005	09/15/2012	3:00 am	30	750	R	NEAH	EC, EN, PN, WO	GR
AF	REBSAMEN PARK	5C007	09/15/2012	3:00 am	30	750	R	NEAH	EC, EN, PN, WO	GR
AF	1401 BISCAYNE DR	2E080	12/09/2012	8:00 pm	30	30	R	NEAH	EC, EN, PN, WO	GR

COUNT of CAPACITY OVERFLOWS : 110

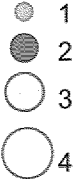


Little Rock Wastewater

2012 Capacity Related SSO's

Locations	Occurrences per Location	Total LRW Capacity SSO's
70	1	70
12	2	24
4	3	12
1	4	4
87	Year-2012	110

SSO Locations
Occurrences per Location



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 06-037-001

AMENDMENT NO. 1 TO CONSENT ADMINISTRATIVE ORDER

By mutual agreement of the Arkansas Department of Environmental Quality (ADEQ) and Little Rock Wastewater (LRW), the following revisions shall be incorporated into Consent Administrative Order (CAO) LIS 06-037:

Additional Findings of Fact

1. The Little Rock Sanitary Sewer Committee's settlement agreement dated September 12, 2001 and referenced in CAO LIS 06-037, Findings of Fact, paragraph 5 has been modified by an agreement between the Little Rock Sanitary Sewer Committee and the Sierra Club to extend deadline for the obligations under the settlement agreement until December 31, 2018.
2. On August 3, 2011, the United States District Court for the Eastern District of Arkansas, Western Division has entered an Order in docket number 4:00-cv-00022-JMM authorizing the extended deadline.
3. LRW has requested that ADEQ likewise extend the final deadline for compliance under the terms of CAO LIS 06-037 and ADEQ agreed to extend the deadline based upon the agreement of the Sierra Club and the United States District Court.

Amended Order and Agreement

1. The last sentence of Order and Agreement, paragraph VIII.2., CAO LIS 06-037, is amended to include the following agreed upon compliance deadline:

Notwithstanding periodic updates to the SECAP, LRW shall achieve compliance with the maintenance and operation of the

wastewater collection system, as it applies to capacity related overflows, by December 31, 2018.

2. Thirty (30) days after the end of the public comment period, LRW will submit to ADEQ a schedule of activities necessary to maintain compliance with the updated SECAP previously submitted to ADEQ.

3. This CAO Amendment is subject to public review and comment in accordance with Ark. Code Ann. § 8-4-103(d). This Amendment is effective upon the Director's signature. ADEQ retains the right and discretion to rescind this Amendment based on comments received during the thirty-day comment period. ADEQ must exercise its right to rescind, if at all, within thirty days after the end of the public comment period.

4. Nothing in the CAO Amendment shall be construed as a waiver by ADEQ of its enforcement authority over alleged violations not specifically addressed in CAO LIS 06-037. This CAO Amendment does not purport in any way to relieve LRW of its responsibilities for obtaining any necessary permits, nor does it exonerate LRW for any past, present, or future conduct not expressly addressed in CAO LIS 06-037.

SO ORDERED THIS 6th DAY OF September, 2011.


TERESA MARKS, DIRECTOR

APPROVED AS TO FORM AND CONTENT:

LITTLE ROCK WASTEWATER

BY: Signature Reggie A. Corbitt
Print or Type Name Reggie A. Corbitt
Title CEO
Date Sept 02, 2011