

May 15, 2015

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

Re: ADEQ Letter dated May 5, 2015

Dear Ms. Daniel:

Please consider this our written response to your letter dated May 5, 2015, requesting additional information related to our Sanitary Sewer Overflow Response Plan (SSORP) and in particular to the recent overflows experienced in March of 2015.

LRW developed our original SSORP in 2002 and performs a review of the document at the end of each year to identify possible areas for improvement. The updated document is then submitted to ADEQ attached to our annual report as required by the current Consent Administrative Order.

Specific responses to your questions:

a. How does Little Rock Wastewater specifically plan on addressing the manholes that recently overflowed? Please list the corrective actions that will be taken.

Please refer to the attached Exhibit A which includes details related to the overflow cleanup work orders associated with the late February rain event and the overflow which occurred at MH 4N013. As of the date of this letter, all work orders associated with the February and March rainfall have been completed.

b. When does Little Rock Wastewater feel that the manholes that recently overflowed will be addressed? Please include an estimated date these will be addressed.

Please refer to the attached Exhibit B which includes the Capital Improvement Plan necessary to meet the requirements of the current Consent Administrative Order. As illustrated, the entire schedule extends to the December 2023 deadline for completion of all projects related to overflow mitigation. The specific manhole referenced (MH 4N013), is associated with several projects which we have highlighted in the schedule.

c. Please include what measures have been put in place to ensure all overflows are promptly and accurately reported.

Little Rock Wastewater places the highest priority on the accurate reporting and clean up of sanitary sewer overflows. Following each rainfall of one inch or more, we dispatch crews to check 75 manhole locations for possible evidence of overflow. The circumstances surrounding the reporting discrepancies of the overflow at MH 4N013 in March, were related to the unusual repeat rainfall occurrences before the initial cleanup work order could be completed. Please refer to the attached Exhibit C for our draft language to be added to our SSORP to address this situation. LRW will implement procedures related to the new language into the SSORP immediately.

If you have any questions, you may contact me by email at howell.anderson@lrwu.com or phone 688-1413.

Sincerely,

LITTLE ROCK WASTEWATER

A handwritten signature in blue ink, appearing to read 'Howell Anderson', written over a light blue horizontal line.

Howell Anderson, P.E.
Chief Operating Officer

Cc: Greg Ramon, CEO
John Jarratt, CAO

Exhibit – A:

LRW adheres to the Sanitary Sewer Overflow Response Plan (SSORP) as amended on January 30, 2015. Exhibit "A" details how LRW specifically responds to overflows and the corrective actions taken.

LRW reported an overflow to ADEQ on February 26, 2015 occurring at manhole 4N013. The overflow was caused by rainfall occurring in Little Rock on February 21, 2015. Manhole, 4N013, is a designated location that LRW checks following rain events that exceed one (1) inch of rainfall within a twenty four (24) hour period. Once LRW crews confirm an overflow has occurred the SSORP procedures for overflow reporting begin. Exhibit "A" provides specific documentation on record for the overflow at 4N013 reported to ADEQ February 26, 2015.

4N013 SSO - Before Cleanup Picture:



4N013 SSO Report submitted to ADEQ:

SOC: 1126699

**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
Waterenfsso@adeq.state.ar.us WITHIN 24 HOURS!

SERVICE REQUEST NUMBER 66779
REPORTED BY S. Williams ADDRESS 5207 Westren Hill
CALL TIME 11:00 AM or PM CALL DATE 2-21-15
(circle one)

RESPONSE DATA

CREW LEADER S. Williams
ARRIVAL TIME 11:00 AM or PM DATE 2-26-15
COMPLETED TIME 5:30 AM or PM DATE 3-19-15
(circle one)

ACTIONS 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 2-21-15 TIME OF SSO 6:00 AM or PM
LOCATION 411-013 ADDRESS 5207 Westren Hill
(circle one)

CAUSE RO = Root D = Debris LF = Equipment Failure
 G = Grease LF = Line Failure
 R = Rainfall HC = Hydro-cleaning
 CO = Construction VA = Vandalism

FAULT 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 Frouche Creek

ACTIVE DISCHARGE YES NO (evidence of Discharge)

OBSERVED FLOW RATE 3 GALLONS PER MINUTE

ESTIMATED DURATION 60 MINUTES

ESTIMATED VOLUME 180 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
 OEH = Observed or Evidence of Human Contact
 ELK = Evidence of Fish Kill

4N013 SSO Service Request:



**Little Rock
Wastewater**

**Service Request
66779**

Type: **SSO** SANITARY SEWER OVERFLOW

Sewer Manhole: **4N013**

Service Request Details

RESOLVED

Address	5207 WESTERN HILLS LITTLE ROCK, AR 72204	Location	
Scheduled Start	2/26/2015 11:31	Scheduled Finish	
Started on	2/26/2015 11:00:00AM	Priority	5 EMERGENCY, DROP ALL OT
Taken By	1404 Eric G Coleman	Authorization	1404
Assigned To	1017 Sherman D Williams	Responsibility	1413 HARRISON, TIM
Source		Reference #	
Project		Budget #	
Comments	02/27/15 (ERIN) - UPDATED INSPECTION START INFO SOC RELATED TO CATEGORY A RAIN EVENT ON 02/21/15 AND IS ASSOCIATED TO THE ASPS RAIN GAUGE WHOSE FINAL 24-HR RAINFALL TOTAL READING WAS 1.42". SENT EMAIL TO ADEQ DUE TO FATE BEING FOURCHE CREEK AND REPORTED ON A RED FORM. FOR MORE INFO, SEE SOC WORK ORDER UNDER 'ASSOCIATIONS' TAB		

Customer Caller Information

Name	WESTERN HILLS COUNTRY CLUB	Day Phone #	<input type="checkbox"/> Contact Customer
Address	5207 WESTERN HILLS AVE LITTLE ROCK, AR 72204-	eMail	<input type="checkbox"/> Notify Customer Regarding

Sewer Manhole Information

Description	4N013	As Built #		Depth	5.14
X Coord	0.00	Ownership	LRWU	Cover Diameter	23.50
Y Coord	0.00	Install Date	01/01/1976	Barrel Diameter	4.00
Z Coord	0.00	Manhole Type	STANDR	Steps	CIRN
Location	DRRW	Cover	STLN	Bench	CONC
Surface Cover	BRSH	Frame		Ring	CIRN
Drop Manhole	<input type="checkbox"/>	Channel	CONC	Cone	BRCK
Metered	<input type="checkbox"/>	Base		Wall	BRCK
Service Status	COMP				

Safety Message

Linked Work Orders

Work Order #	Status	Activity	Date Started	Date Completed
1126699	CLOSED	SOC SEWER OVERFLOW - CAPACITY	02/26/2015	03/19/2015

Labor

Date	Time From	Time To	Crew	Employee ID	Pay Type	Hours
/ /	:	:				
/ /	:	:				
/ /	:	:				

4N013 SSO Work Order:



**Little Rock
Wastewater**

**Work Order
1126699**

Activity: SOC SEWER OVERFLOW - CAPACITY

Sewer Main: SMH 4N013 → 4N012 SMH

Work Order Details

Activity Condition SOC SEWER OVERFLOW - CAPACITY

WO Address	5207 WESTERN HILLS LITTLE ROCK, AR 72204	WO Location	
Initiated on	2/21/2015 6:00:00PM	Scheduled Start	
Started on	2/26/2015 11:00:00AM	Priority	5 EMERGENCY, DROP ALL
Initiated By	1017 SHERMAN WILLIAMS	Authorization	1608 ERIN MARKS
Assigned To	1017 Sherman D Williams	Responsibility	ERHST EMERGENCY AREA SOUTH
Source	INTERNALLY FOUND STOPPAGE	Maint Type	REA
Project		Budget #	406-4001-156-000-00
Problem	INFILTRATION	Service Request	66779
Comments	02/27/15 (ERIN) - UPDATED SERVICE REQUEST #66779. SOC RELATED TO CATEGORY A RAIN EVENT ON 02/21/15 AND IS ASSOCIATED TO THE ASPS RAIN GAUGE WHOSE FINAL 24-HR RAINFALL TOTAL READING WAS 1.42". SENT EMAIL TO ADEQ DUE TO FATE BEING FOURCHE CREEK AND REPORTED ON A RED FORM. CLEANUP STILL IN PROGRESS. RECEIVED BEFORE PHOTO FROM x1017 AND ATTACHED TO WORK ORDER. ALONG WITH OVERFLOW REPORT FORM AND ADEQ EMAIL NOTIFICATION. 02/26/15 (ERHSTH) - TOOK BEFORE PHOTO OF MH 4N013 OVERFLOW. 03/19/15 (ROW) - CLEANED DEBRIS FROM OVERFLOW AT MH 4N013. 03/19/15 (ERHSTH) - TOOK AFTER PHOTO OF MH 4N013 CLEANUP. 03/20/15 (ERIN) - RECEIVED AFTER PHOTO FROM x1017 AND ATTACHED TO WORK ORDER. CLOSED WORK ORDER AND RESOLVED SERVICE REQUEST 03/23/15 (ERIN) - x1017 CALLED TO STATE HE USED TWO (2) 5-GALLON BUCKETS OF ENZYMES FOR CLEANUP IN WESTERN HILLS AREA. SENT TO STOREROOM TO ADD TWO (2) 5-GALLON BUCKETS OF ENZYMES TO WORK ORDER FROM V1316.		

Sewer Main Information

Sub Basin	40030	Complex	4083300	Ward	6
Mapsheet	4N	Area	HSTH	Parcel	
X Coord	0.00	As Built #		Diameter	24.00
Y Coord	0.00	Ownership	LRWU	Height	0.00
Z Coord	0.00	Install Date	07/27/2009	Length	172.00
Location	WATERWAY4	Main Type	GRAVITY	Slope	0.00
Surface Cover	CREE-EXPSD	Pipe Type	CIPR	Ups Depth	5.14
Critical Rating	E NON CRITICAL SEWER	Main Shape	CIRC	Dns Depth	7.82
Service Status	COMP	Joint Type			

Safety Message

Last Completed, Linked, and Open Work Orders

Work Order #	Status	Activity	Usage	Date Started	Date Completed
1135308	COMPLETED	CIWALK WALKING LINES WORKFLOW	0	05/20/2015	05/20/2015
1131427	COMPLETED	CIROW RIGHT OF WAY	0	04/07/2015	04/07/2015
		Next Scheduled 04/07/2016			
1135350	IN WORK	SOC SEWER OVERFLOW - CAPACITY	0	05/12/2015	
1052487	IN WORK	CIROW RIGHT OF WAY	0	07/26/2013	
1133952	OPEN	CIWALK WALKING LINES WORKFLOW	0		

4N013 SSO 24 Hour Report submitted to ADEQ:

Erin Marks

To: ADEQ SSO Reporting
Cc: Timothy Harrison; Richard McMillan; Jo Anna Brown; Eric Coleman; Michael Kline; Howell Anderson; Walter Collins; Eric Wassell; Perry Pearson; Erin Marks; Christopher Dunham
Subject: LRW OVERFLOW NOTIFICATION

This is an email notification that the following overflow has occurred that involved environmental impact and/or human contact:

DATE OF SSO: 02/26/2015
LOCATION OF SSO: 52074 WESTERN HILLS x4 (FATE: FOURCHE CREEK)

Thanks,
Little Rock Wastewater
Overflow Response Crew

Erin Marks
Maintenance Administrator
Little Rock Wastewater
Phone: 501-223-1501
Cell: 501-554-2345
Fax: 501-223-1513
<mailto:erin.marks@lrwu.com>

4N013 SSO After Cleanup Picture:



In Summary, Exhibit "A" has provided detailed documentation of how LRW has addressed the recent overflow at manhole 4N013 reported to ADEQ on February 26, 2015. The documentation includes before and after cleanup photographs taken of the SSO location, the SSO report submitted to ADEQ, LRW work order and service request documents and the 24 hour report submitted to ADEQ because the overflow that occurred involved environmental impact and/or human contact. The procedures followed by LRW in reporting this incident are consistent with the procedures stated in the SSORP as amended January 30, 2015 that ADEQ has on file.

EXHIBIT B

Activity	Intermediate Completion Date in CAO	Previously Adjusted Intermediate Completion Date	Current Estimated Completion Date	Actual Completion Date	Status as of 1-May-15
Collection System					
Granite Mtn. OMP - M2	31-Dec-17				Design
Subbasin 30100 OMP	31-Dec-12	31-Dec-15	31-Dec-19		Future
Jimerson West OMP	31-Dec-18				Future
Longfellow OMP Subbasin 11400	31-Dec-18				Future
Rose Creek East OMP SB 10901-M32	31-Dec-21				Future
Rose Creek Central OMP	31-Dec-19				Future
Rose Creek West OMP	31-Dec-22				Future
Barrow Addition OMP SB 30700	31-Dec-09	31-Dec-16	31-Dec-22		Future
University Ave. Relay R7	31-Dec-16				Design
Roselawn Cemetery Relay R9	31-Dec-16				Design
17th Street Relay R10	31-Dec-16				Design
Abigail Street Relay R11	31-Dec-17				Future
Rose Creek East Relay - R13	31-Dec-16				Design
Victory Street Relay - R20	31-Dec-16				Design
Rodney Parham Relay - R25	31-Dec-16				Design
Markham to Rodney Parham Relay - R26	31-Dec-16				Design
Walton Heights OMP - Basin 11600	31-Dec-21				Future
River Ridge OMP - Basin 11200	31-Dec-18				Future
Sherrill Heights OMP - Basin 11000	31-Dec-18				Future
36th St. to Mabelvale Pike Outfall - R22 & R23	31-Dec-14	30-Jun-18	31-Dec-21		Future
3L078 to 3i080 42" to 60" - R3	31-Dec-22				Future
Rebsamen Collector/Murray Park 10090	31-Dec-22				Future
Upper Country Club Outfall - R19	31-Dec-16				Design
Rebsamen Collector/Commercial 10500	31-Dec-22				Future
Rebsamen Collector/Harbor 10060	31-Dec-23				Future
Overlook/Pinnacle Point 10070	31-Dec-19				Future
Rebsamen Collector/Golf Course OMP 10080	31-Dec-23				Future
Boyle Park Mainline - (Exh C-RQ19) - R24	31-Dec-23				Future
48" Cross Connection (16K) - R29	31-Dec-18				Design
RebsamenCollector/Alltel 10400	31-Dec-23				Future
Mainline Improv. For Modeled Overflow/Growth	31-Dec-21				Future
17th Street Pipe Burst - R15	31-Dec-16				Design
Allsopp Park South Near CRPS - R16	31-Dec-23				Future
Cantrell Basin I/I Reduction SSES	31-Dec-18				Future
Cantrell Basin I/I Reduction Construction	31-Dec-22				Future
Middle Hinson	31-Dec-20				Future
Rebsamen Basin I/I Reduction	~ 31-Dec-23				Future
Rock Creek Basin I/I Reduction	~ 31-Dec-23				Future
Sewer Assessment Lines > 18"	31-Dec-19				Future
Sewer Repairs Lines > 18"	31-Dec-23				Future
Needed Collection System Projects	31-Dec-25				Future
Linework to North 60 ~	~	31-Dec-14	30-Jun-18		Future
Pump Stations					
Cantrell PS Upgrade & Force Main	~ 31-Dec-15		31-Jul-15		Construction
Peak Flow Additional Pump	~	31-Dec-17			Design
Jamison PS Upgrade	~	28-Feb-18	31-Mar-19		Future
Treatment Plants					
Scott Hamilton Peak Flow EQ Addition	~	*	31-Dec-17	31-Dec-18	Design
Adams Storage & Disinfection Facilities	~	~	30-Sep-18	31-Dec-23	Future
Fourche Creek WWTP (AR0040177)					
Schedule III	^^ 31-Dec-09	31-Mar-19	31-Dec-17		Designed
Adams Nutrient Removal (Ammonia)	^^ 31-Dec-21				Future

* = formerly known as Mabelvale Peak Flow
 ** = formerly known as Maumelle Main Line
 ~ = projects listed in the SECAP update
 ^^ = projects related to permit modifications or reliability upgrades

Exhibit C: Draft Language to 2016 SSORP

III. Overflow Response Procedure

F. Responding to overflow locations where an SSO has reoccurred prior to the initial SSO being completed

- When an SSO has been confirmed to have reoccurred prior to the initial SSO reported being closed the initial SSO reported will be closed with associated details.
- The reoccurring SSO that has been confirmed will be recorded as another SSO incident with associated details.
- In the event that manhole locations listed in Table A-2 become inaccessible to LRW crews the crew will conduct site visits daily until the site becomes accessible using an emergency call work order activity to document site conditions.