



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](mailto:howell.anderson@lrwu.com) or phone 688-1413.

Sincerely,

**LITTLE ROCK WASTEWATER**



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  
Waterenfssso@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

ACTIONS TAKEN:  HC = Hydro-cleaned  EC = Environmental Cleanup  PN = Public Notice  
 HR = Hand Rodded  EN = Report by Engineering  WO = Work Order

SSO DATA

DATE OF SSO 2-21-15 TIME OF SSO 6:00 AM or  PM  
(circle one)  
LOCATION 4N-013 ADDRESS 5207 Westren Hill

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

FAH:  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: Froakhe 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  
 FEK = 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  
Dun Resolved 3/19/2015 E  
Taken By 1404 Eric G Coleman  
Authorization 1404  
Resolution SSOC  
Assigned To 1017 Sherman D Williams  
Responsibility 1413 HARRISON, TIM  
Reference #  
Source  
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 #  Contact Customer  
Address 5207 WESTERN HILLS AVE  
eMail  Notify Customer Regarding  
LITTLE ROCK, AR 72204-

**Sewer Manhole Information**

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

**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

<b>WO Address</b>	5207 WESTERN HILLS LITTLE ROCK, AR 72204	<b>WO Location</b>	
<b>Initiated on</b>	2/21/2015 6:00:00PM	<b>Scheduled Start</b>	
<b>Started on</b>	2/26/2015 11:00:00AM	<b>Priority</b>	5 EMERGENCY, DROP ALL
<b>Initiated By</b>	1017 SHERMAN WILLIAMS	<b>Authorization</b>	1608 ERIN MARKS
<b>Assigned To</b>	1017 Sherman D Williams	<b>Responsibility</b>	ERHST EMERGENCY AREA SOUTH
<b>Source</b>	INTERNALLY FOUND STOPPAGE	<b>Maint Type</b>	REA
<b>Project</b>		<b>Budget #</b>	406-4001-156-000-00
<b>Problem</b>	INFILTRATION	<b>Service Request</b>	66779
<b>Comments</b>	<p>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.</p> <p>02/26/15 (ERHSTH) - TOOK BEFORE PHOTO OF MH 4N013 OVERFLOW.</p> <p>03/19/15 (ROW) - CLEANED DEBRIS FROM OVERFLOW AT MH 4N013.</p> <p>03/19/15 (ERHSTH) - TOOK AFTER PHOTO OF MH 4N013 CLEANUP.</p> <p>03/20/15 (ERIN) - RECEIVED AFTER PHOTO FROM x1017 AND ATTACHED TO WORK ORDER. CLOSED WORK ORDER AND RESOLVED SERVICE REQUEST.</p> <p>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 V1310.</p>		

**Sewer Main Information**

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

**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.



<b>EXHIBIT B</b>	<b>Activity</b>	<b>Intermediate Completion Date in CAO</b>	<b>Previously Adjusted Intermediate Completion Date</b>	<b>Current Estimated Completion Date</b>	<b>Actual Completion Date</b>	<b>Status as of 1-May-15</b>
<b>Collection System</b>						
	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
<b>Pump Stations</b>						
	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
<b>Treatment Plants</b>						
	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

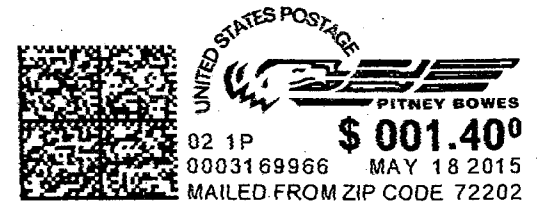
**EXHIBIT B**

**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.



**Little Rock  
Wastewater**

11 Clearwater Drive  
Little Rock, AR 72204  
501-376-2903  
Fax 501-688-1409

TO:



Leslie Allen-Daniel  
Enforcement Analyst  
Water Division, Enforcement Branch  
ADEQ  
5301 Northshore Drive  
N Little Rock, AR 72118-5317