

# SIERRA CLUB Settlement Compliance Report

Submitted to the Little Rock Water Reclamation Commission

February 16, 2022

#### SIERRA CLUB SETTLEMENT ANNUAL REPORT FOR 2021

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#### SIERRA CLUB SETTLEMENT COMPLIANCE REPORT FOR 2021 EXECUTIVE SUMMARY From Greg Ramon, C.E.O.

I am pleased to submit the attached Sierra Club Annual Report outlining the progress Little Rock Water Reclamation Authority (LRWRA) has made in mitigating sanitary sewer overflows during 2021. System improvements began on September 12, 2001, when LRWRA (formerly Little Rock Wastewater) and the Sierra Club signed the Settlement Agreement (Agreement). Since then, LRWRA has worked diligently to comply with the terms set forth. Since its inception, LRWRA has spent almost \$446.7 million to meet the requirements of the Agreement. LRWRA will continue to renew the aging collection system and reduce the occurrence of sanitary sewer overflows.

Since signing the Agreement, LRWRA has realized great success in mitigating non-capacity related overflows and continued to meet the Agreement throughout 2021 This is a result of the established maintenance procedures and schedules which continue to provide the desired results by minimizing mainline stoppages within the collection system. It is my privilege to say that LRWRA continues to meet the requirements for non-capacity overflows outlined in the Agreement.

As it relates to capacity related overflows, LRWRA continues to have success. We continue to secure the needed sewer rate increases and bond financing that will fund capital improvements to mitigate capacity related overflows within the system. We are continuing a rehabilitation and replacement program to improve the performance of the collection system. We recently completed the hydraulic throughput of the Fourche Creek Water Reclamation Facility, and in early 2022, we are set to complete improvements to the Adams Field Water Reclamation Facility which will increase the hydraulic throughput. Both projects will increase the capacity of the system. We are confident it will be recognized as one of the most innovative approaches to mitigating overflows.

Also, as part of our ongoing communication efforts, LRWRA continues its outreach efforts to educate our customers on available programs to assist in preventing overflows, maintaining a reliable sewer system and renewal projects around the city. Our commitment to providing excellent service to the community is as strong as ever. We continue to promote our free *Can the Grease®* program which provides residents the ability to dispose of grease safely by not pouring it into the sewer and the *Sewer Service Line Replacement Program* which provides financial assistance when residents replace their entire sewer service. Our *Cap the Clean Out* Program focuses on sealing the system by replacing missing or damaged caps at no cost to the homeowner, which helps to keep debris and rainwater out of the system. Our newest program is our *Don't Flush That* campaign focused on educating residents about the items that cause the most damage to the system and the environment and reminding them to *Don't Flush That*.

I am proud of our many successes and look forward to continuing to move LRWRA in the right direction. Our efforts are in line with improving our community, the environment, and protecting our one water.

Respectfully submitted,

AugPa

Greg Ramon, CEO

#### I. INTRODUCTION

The following activities constituted LRWRA's major compliance efforts which are discussed with other activities in the order mentioned, consisting of (1) Project Updates, (2) Financing, (3) Other Compliance Actions, (4) Supplemental Environmental Projects, (5) 2021 Non-Capacity Related Sanitary Sewer Overflows, and (6) 2021 Capacity Related Overflows.

#### II. **PROJECTS UPDATE**

The System Evaluation Capacity Assurance Plan (SECAP) update is the Capital Improvement Master Plan (CIP) to mitigate overflows for the designated design storm. Amendment No. 1 to the 2010 SECAP Update was implemented by the Little Rock Water Reclamation Commission (LRWRC) by resolution in April 2016. This Amendment No. 1 to the 2010 SECAP Update encompassed a reduction in storage capacity at the Scott Hamilton Facility, eliminated additional storage at the Adams Field Water Reclamation Facility (AFWRF), and called for a high-rate treatment process at Adams that eliminates the need for the aforementioned storage. Amendment No. 2 to the 2010 SECAP Update was implemented by the Little Rock Water Reclamation Commission by resolution in April 2019. This amendment validates the reduction of inflow and infiltration (I/I) in the Rock Creek and Cantrell Road areas will be as effective at overflow mitigation as the storage methods originally proposed. Amendment No. 2 also further defines the design storm referenced within the 2010 SECAP. To help demonstrate compliance with the Consent Administrative Order, LRWRA has created a dashboard to allow easy access online to view rainfall totals and compliance within the twoyear storm curve which will benefit both Department of Environmental Quality (DEQ) and the Public. The dashboard is available through our website under "About Us and Regulation Compliance.

LRWRA listed the master plan projects in the 2021 budget and scheduled them accordingly. The report lists storage facilities, operation adjustments, capacity improvements, and other pertinent items to mitigate overflows. One such project, the Upper Country Club Outfall was completed which required a capacity increase from 8-inch and 10-inch mains to a 12-inch mainline. The one storage site project is now complete, Scott Hamilton Drive Peak Flow Facility (formerly referred to as the Mabelvale Pike Peak Flow Attenuation Facility), adding 31 million gallons (MG) of storage capacity to the existing facility. On December 1, 2015, LRWRA was granted a discharge permit modification allowing parallel treatment to the existing biological train. The new water reclamation facility configuration allows for 94 million gallons per day of continuous treatment while meeting discharge permit parameters. The new approach eliminates the need for additional storage at the AFWRF. There are multiple projects listed in the SECAP update to increase the capacity of existing gravity mains. A large diameter main (42-inch & 54-inch) proposed from 36<sup>th</sup> Street to Mabelvale Pike is the largest line project required. Multiple projects such as manhole adjustments and upsizing of mains are included in the report. The following is a list of projects already completed or currently included in the 2022 budget.

#### A. Little Maumelle Water Reclamation Facility

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

#### B. Cantrell Road Pump Station and Force Main Upgrade

Construction of the projects was completed in November 2015.

#### C. <u>Scott Hamilton Drive Peak Flow Facility (formerly referred to as Mabelvale Pike Peak</u> <u>Flow Attenuation Facility)</u>

Construction of a 30-million-gallon peak flow attenuation facility was completed in September 2009 in efforts to mitigate overflows. The updated SECAP, dated November 2010, identified the need for additional storage to complement the existing storage facility on Scott Hamilton Drive. The additional storage, along with a hydraulic upgrade at the Peak Flow Pump Station, further reduces the surcharge of rainfall dependent I/I within the North and South 60 Sewer Interceptors. This mitigates sanitary sewer overflows within the service area. The preliminary engineering report identified the need for an additional 31 MG of storage. The Conditional Use Permit phase is completed.

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 with the additional 31 MG storage at the Scott Hamilton Peak Flow Facility. The additional pump was installed in 2018 along with the additional storage basin.

Construction of this project was completed in May 2019.

#### D. Fourche Creek Water Reclamation Facility Hydraulic Upgrade

The hydraulic upgrade of the Arch Street Pump Station from 36 million gallons per day (MGD) to 45 MGD necessitated the hydraulic upgrade of the Fourche Creek Water Reclamation Facility (FCWRF) to a minimum of 45 MGD. In 2008, LRWRA, with its consultant, completed a 20-year CIP to assess treatment processes, identify deficiencies, and plan for improvements to the water reclamation facility 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. 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, was completed October 2011. With the completion of the second phase, the water reclamation facility can hydraulically handle 45 MGD. The third phase addressed headworks and primary and secondary clarifier needs. Phase three had a project cost of \$10,048,835 and was completed in early 2021.

#### E. <u>Adams Field Parallel Treatment – (previously Storage/Disinfection)</u>

The updated SECAP report was revised November 2010 and identified the need for additional storage at the AFWRF to complement existing and proposed storage facilities (Scott Hamilton Drive Peak Flow Facility). The additional storage would allow for extended hydraulic pass-through of rainfall dependent I/I volume thereby mitigating sanitary sewer overflows within

the service area. However, the amount of storage prescribed in the SECAP update limits the wet weather capacity of the water reclamation facility to the duration of the design storm. Also, elevated flow rates through the biological portion of the water reclamation facility hinder the ability of the water reclamation facility to remove ammonia nitrogen (NH3-N). Within the 2016-2017 permit cycle, ADEQ requires more stringent limits on the amount of NH3-N within the effluent.

In 2014, LRWRA applied for and was granted in late 2015, a permit modification to enable parallel treatment of the biological system. A parallel treatment system used during wet weather events takes peak flows from the biological treatment train allowing it to run steady state and thereby removing NH3-N to within permit limits. Also, parallel treatment proves effective in adequately treating effluent to within permit limits during wet weather events. The advantage of a parallel treatment system over storage is the water reclamation facility can maintain its peak capacity indefinitely, thereby reducing the hydraulic impact to the collection system during a rain event. With this permit modification, LRWRA no longer needed to add additional storage at the water reclamation facility and proceeded with parallel treatment design in 2017. As a part of this project, LRWRA plans to increase the peak flow treatment capacity to 94 MGD by installing media filtration to be operated in parallel with the existing activated sludge facilities. In 2015, before ADEQ determined the oxygen demanding constituent of all municipal wastewater discharges, NH3-N, had a significant effect on the predicted dissolved oxygen (DO) level in the Arkansas River. The ADEQ water quality model indicated a NH3-N permit limit of 7.0 mg/l for the AFWRF was needed to meet the in-stream DO water quality standard of 5.0 mg/l. This project addresses capital improvements to the secondary clarification, aeration basins and equipment in order to comply with future permit limits for NH3-N removal. The project cost was \$5,238,864 in 2021 and is set to finish early 2022, with a remaining cost of \$200,000 to be paid in 2022.

#### F. Fourche Creek Water Reclamation Facility Nutrient Removal

Effective October 1, 2014, ADEQ issued a permit renewal for the facility. Within the permit, ADEQ directed LRWRA to comply with a schedule for ammonia-based limits predicated upon general water quality standards for this segment of the Arkansas River. At 18-months after the effective date of the renewed permit, Report No. 1 was submitted which contained an evaluation of the current treatment system, as configured, and its inability to comply with the final ammonia nitrogen (NH3-N) limits on a consistent basis. Prior to the 24-month after the effective date deadline for Report No. 2, correspondence was received from ADEQ indicating their re-evaluation of the water quality model incorporating more accurate river widths, and site-specific instream values instead of ecoregion-based values. According to this letter, the re-evaluation of the modeling analysis and the ammonia toxicity calculations determined NH3-N limits are not needed for this facility. Both the updated model and the updated ammonia toxicity calculations were technically reviewed and deemed technically acceptable by EPA. Therefore; ADEQ recommended that LRWRA file for an NPDES permit modification application as soon as possible to have the final CBOD5 and NH3-N limits and the remaining compliance schedule removed from the current permit. On October 13, 2016, LRWRA filed with ADEQ the FCWRF Permit Modification Application requesting these changes.

#### G. Adams Field Water Reclamation Facility Asset Renewal Phase 1

The AFWRF was placed into service as a primary water reclamation facility in 1961 with the addition of secondary treatment in 1972. AFWRF went through some modifications in the 1980s. In the mid-2000s, the facility was again modified to reduce odors, eliminate risks associated with chlorine gas storage, and accommodate flows up to 94 MGD through primary treatment for a period of hours. Through these modifications, some facility assets were renewed or replaced to accommodate the intent of the modifications. The goal is to have AFWRF further evaluated using a formal Asset Management Plan (AMP) to identify the lifespan and replacement timeframe for existing assets. While the AMP is being developed in another project, this project sets aside monies to allow for the systematic replacement of identified assets targeted for replacement or renewal at the facility.

#### H. Jamison Pump Station Upgrade

The Jamison Road Pump Station was constructed in 1993. The station consists of five submersible pumps which include two 25 HP and three 150 HP pumps. There are two grinders and screens – one on each of the inlet channels. Dry weather flow at the station is approximately 2 MGD. Peak pumping capacity is approximately 16 MGD. Overall, the wet well, valve vault, and building structure are in good condition and the station is functioning as designed. No changes are immediately required, but the SECAP recommended installing back-up power, painting the ferrous surfaces at the station, and replacing the grinders with a mechanical bar screen when maintenance of the grinders becomes an issue. The forecast prepared within the 2022 capital budget allocates a project cost of \$2,960,500 for 2022. The project design was finished in 2021 and the construction is scheduled to be complete in 2022.

#### I. Overflow Mitigation Projects

In the late 1980s, LRWRA was the first municipality in Arkansas to establish a program to address excessive I/I which leads to sanitary sewer overflows during or following wet weather events. During the 1990s, LRWRA 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 treated. LRWRA will continue this program as evidenced by the following identified future projects and corresponding funding efforts:

#### 1. Overflow Mitigation Projects (OMPs) Completed under RLF VIII:

- a. Jimmerson Creek (RLF VIII)
  - Completed in 2010.
- b. Jimmerson West Outfall (RLF VIII)
- Completed in 2010.
- c. Jimmerson East and Upper Hinson Manhole Rehab (RLF VIII)
  - Completed in 2010.

- d. Allsopp South (RLF VIII)
  - Completed in 2011.
- e. Barton (RLF VIII)
  - Completed in 2011.
- f. System Evaluation and Capacity Assurance Plan (SECAP) Update (RLF VIII)
  Completed in 2010.

#### 2. Overflow Mitigation Projects (OMPs) funded by RLF 2013:

- a. Allsopp North/Country Club Rehabilitation
  - Construction completed December 2015.
- b. Allsopp Park/Country Club Outfall
  - Construction completed February 2015.
- c. Leawood OMP
  - Construction completed October 2017.
- d. Lower Swaggerty OMP
  - Construction completed August 2017.
- e. Pleasant Valley OMP
  - Construction completed October 2015.
- f. Echo Valley OMP
  - Construction completed April 2016.
- g. 0H 0G Relocation
  - Construction completed March 2016.
- h. 42" Force Main Inspection & Diversion Structure R29
  Construction completed December 2016.
- i. Allsopp North/Country Club Manhole Rehab
  - Construction completed October 2017.
- j. Leawood Manhole Rehab
  - Construction completed October 2017.
- k. Echo Valley Manhole Rehab
  - Construction completed October 2017.
- 1. Pleasant Valley Manhole Rehab
  - Construction completed October 2017.

#### m. Springer Blvd – R1

- Construction completed August 2017.
- n. West Markham Mainline R6
  - Construction completed September 2017.
- o. Bishop Street Upsize R14
  - Construction completed September 2016.
- p. Grassy Flat Main R27
  - Construction completed December 2016.
- q. Lower Swaggerty OMP Manhole Rehab
  - Construction completed October 2017.

- r. 17<sup>th</sup> Street Pipeburst Upsize R15
  - Construction completed September 2016.
- s. Fair Park Relay R12
  - Construction completed August 2016.

#### 3. Overflow Mitigation Projects (OMPs) Funded for RLF 2016:

- a. 36<sup>th</sup> Street to Mabelvale Pike Outfall
  - Project continued using RLF 2018.
- b. Granite Mountain OMP Linework
  Construction completed September 2018.
- c. Jimerson West OMP
  - Project continued using RLF 2018.
- d. Longfellow OMP
  - Project continued using RLF 2018.
- e. Mainline Improvements for Verified Overflows/Growth
  - Project continued using RLF 2018.
- f. Middle Hinson Drainage Area OMP
  Project continued using RLF 2018.
- g. Overlook/Pinnacle Point OMP
  Project continued using RLF 2018.
- h. River Ridge OMP
  - Project continued using RLF 2018.
- i. Rose Creek Central OMP
  Project continued using RLF 2018.
- j. Sherrill Heights OMPProject continued using RLF 2018.
- k. Upper Country Club Outfall
  - Project continued using RLF 2018.
- 4. Overflow Mitigation Projects (OMPs) Funded by RLF 2018:
  - a. 36<sup>th</sup> Street to Mabelvale Pike Outfall
    - Construction completed December 2020.
  - **b.** Granite Mountain OMP Manhole Rehab
    - Construction completed April 2021.
  - c. Jimerson West OMP
    - Construction completed September 2019.
  - d. Longfellow OMP
    - Construction completed June 2021.
  - e. Mainline Improvements for Verified Overflows/Growth
    Construction completed January 2021.
  - f. Middle Hinson Drainage Area OMP
    - Construction completed January 2022.

- g. Overlook/Pinnacle Point OMP
  - Construction completed September 2019.
- h. River Ridge OMP
  - Construction completed September 2019.
- i. Rose Creek Central OMP
  - Construction completed June 2021.
- j. Sherrill Heights OMP
  - Construction completed June 2021.
- k. Upper Country Club Outfall
  - Construction completed March 2019.

#### 5. Overflow Mitigation Projects (OMPs) Planned for RLF 2019:

#### RLF 2019 Projects

Inflow and Infiltration Reduction Program – Subbasins 30100, 30700	\$3,774,256
Inflow and Infiltration Reduction Program - Cantrell/Rebsamen/Rock	\$11,131,115
Creek/Grassy Flat/Walton Heights Basins	
University Ave, 17th Street, Rodney Parham, Markham to Rodney	\$1,345,681
Middle Hinson Drainage Area OMP	\$1,038,749
Total	\$17,289,801

Project purpose: SECAP/CAO/Sierra Club – Protect Health, Environment

#### 6. Overflow Mitigation Projects (OMPs) Planned for RLF 2020:

#### RLF 2020 Projects

Inflow and Infiltration Reduction Program – Subbasins 30100, 30700	\$2,798,866
Inflow and Infiltration Reduction Program - Cantrell/Rebsamen/ Rock Creek/Grassy Flat/Walton Heights Basins	\$18,367,808
University Ave Relay	\$480,610
Total	\$21,647,284

Project purpose: SECAP/CAO/Sierra Club – Protect Health, Environment

#### III. FINANCING

#### **Discussion**

No new Revolving Loans were issued in 2021. Existing bond issues with remaining proceeds were used to fund the design and construction of collection system overflow mitigation projects provided in the SECAP and the SECAP Update. The goal of these projects is to mitigate capacity related SSOs in the LRWRA collection and treatment system.

#### Water Reclamation System Revenue Bonds Series 2017 (Series 2017 Bond)

Proceeds from Series 2017 Bond totaling \$1,089,417 funded the costs associated with professional services for the Fourche Creek Water Reclamation Facility Phase III Rehabilitation project to increase the hydraulic capacity of the water reclamation facility from 36 MGD to 45 MGD and project 4170300, Sewer Assessment Lines > 18 Inches. The Series 2017 Bond proceeds remaining to be drawn as of December 31, 2021, total \$747,630 and are expected to be drawn in full in 2022.

#### Water Reclamation System Revenue Bonds Series 2018 (RLF 2018)

Proceeds from RLF 2018 totaling \$8,437,088 funded the costs associated with engineering services and construction of the following projects in 2021. The RLF 2018 proceeds remaining to be drawn as of December 31, 2021, total \$4,342,738 and are expected to be drawn in full in 2022.

Project Number	Project Description
4084600	Longfellow Subbasin 11400 OMP
4101800	Rose Creek Central OMP
4115000	River Ridge Subbasin 11200 OMP
4115100	Sherrill Heights Subbasin 1100 OMP
4120500	36th Street to Mabelvale Pike Outfall
4120800	Upper Country Club Outfall
4121400	Overlook/Pinnacle Point
4121900	Mainline Improvements for Modeled
	Overflows/Growth
4160600	Middle Hinson
4170300	Sewer Assessment Lines > 18 Inches
4171700	Jimerson West OMP Phase 2

#### Water Reclamation System Revenue Bonds Series 2019 (RLF 2019)

Proceeds from RLF 2019 totaling \$7,939,016 funded the costs associated with engineering services and construction of the following projects in 2021. The RLF 2019 proceeds remaining to be drawn as of December 31, 2021, total \$3,473,174 and are expected to drawn in full in 2022.

Project Number	Project Description
4110400	Barrow OMP SB 30700
4112400	University / Rodney Parham
4190400	I/I Basin Reduction Project - Phase I
7191000	Fourche Creek FOG Receiving Station &
	Digester Upgrade

#### Water Reclamation System Revenue Bonds Series 2020A (RLF 2020A)

Proceeds from RLF 2020A totaling \$8,266,679 funded the costs associated with engineering services and construction of the following projects in 2021. The RLF 2020A proceeds remaining to be drawn as of December 31, 2021, total \$42,072,437 and are expected to be drawn in full in 2023.

Project Number	Project Description
6130500	Barrow OMP SB 30700
7130300	Adams Field Parallel Treatment & Disinfection
	Upgrade
7191000	Fourche Creek FOG Receiving Station &
	Digester Upgrade

#### IV. OTHER COMPLIANCE ACTIONS

#### A. <u>Signage/Public Notification/Public Information:</u>

As required in the Agreement, LRWRA staff developed a Sanitary Sewer Overflow Response Plan (SSORP) which was authorized by the Little Rock Sanitary Sewer Committee, now the Little Rock Water Reclamation Commission (LRWRC), on September 18, 2002. The SSORP, as amended, is included in this document (*see Attachment A*). The plan establishes a protocol for maintenance crews to follow when responding to a sanitary sewer overflow 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 (*see Attachment B*). A copy of the 'door hanger' LRWRA uses to post residences is also provided (*see Attachment C*).

The sanitary sewer overflow notification program requirements contained in the Agreement are addressed in the SSORP, including the provisions for permanent signage at recurring sanitary sewer overflow locations on public property. Locations eligible for permanent signage are in *Table A-1* of the SSORP. Permanent signage is placed at recurring sanitary sewer overflow sites (see Attachment D).

#### B. Fats, Oils, and Grease Program

In order to help mitigate dry weather overflows and to further LRWRA's compliance efforts with EPA National Pretreatment Program, a new FOG Ordinance was passed by the Board of Directors on November 5, 2019, and was fully implemented on February 3, 2020. LRWRA requires annual registration of all haulers and registered 9 grease haulers in 2021, who service grease interceptors for Food Service Establishments (FSEs) within the City of Little Rock. These haulers are required to manifest the brown grease from its point of collection to its point of disposal. LRWRA uses Swift Comply software to help track manifested pump outs and compliance schedules of the FSEs in Little Rock. The requirement in the Ordinance for FSEs (restaurants or other entities with grease interceptors) to use only registered haulers has proven helpful in encouraging the haulers to properly submit their manifests. COVID-19 continued to impact FSEs in 2021, but nevertheless LRWRA was able to account for over 3 million gallons of FOG manifested by haulers in 2021. We anticipate this volume to increase in 2022 as restaurants return to more normal operation. LRWRA was able to conduct its outreach to FSEs in 2021, through site visits and education of FSEs. We believe this outreach program has been beneficial in increasing the numbers of registered FSEs and manifests of FOG pumped from those FSEs, and we will continue this outreach program going forward.

#### C. <u>Public Education and Outreach Programs:</u>

LRWRA is committed to building community partnerships and providing public outreach regarding our "One Water. One Future." commitment.

#### 1. Public Relations

To provide consultation services, market research, and other related services, LRWRA has contract services with a communications and marketing consultant company. This effort has been critical in outreach efforts around Project RENEW, redesigning informational material to make it customer friendly, and marketing strategies to promote educational programs.

#### 2. Project Renew

As part of LRWRA's multi-year, capital improvement project to renew aging pipelines throughout the city, an outreach campaign continued in project areas. The outreach included postcard mailers, door hangers, vehicle magnets for contractors and an interactive project map on the website, so residents can search to see if there are current or planned projects in their neighborhood (*see Attachment E*).

#### 3. Can the Grease©

The *Can the Grease®* initiative kicked off in 2002 as a means of education, motivation, and promotion of the grease related problems in Little Rock's sanitary sewer system. LRWRA's residential customers can request a free grease starter kit, which includes a grease container, three (3) heat-resistant liners, the LRWRA *Can the Grease®* information card, and an information magnet. Starter kits are also distributed in larger quantities at community events and to apartment complexes. In 2021, we delivered 2,700 kits to

residential customers, apartment complexes, mobile home parks, and community centers. Additional heat-resistant liners are available at no-cost. *(see Attachment F)*.

#### 4. Cap the Cleanout

*Cap the Cleanout* is an initiative kicked off in 2017. While working in project areas evaluating and rehabilitating sewer lines, if a cleanout cap is found to be missing from the homeowner's sewer line, they can receive a free cap, and have it replaced by LRWRA. In 2021, LRWRA installed 7 cleanout caps at individual residences. However, with the inception of new projects in four different drainage subbasins, we anticipate the need for many more cleanout caps to be delivered to homeowners in 2022 and beyond. This is part of our continued effort to help homeowners properly maintain their sewer service line while helping us seal the system. By replacing the cleanout cap, it prevents rainwater from entering the sewer system causing water to unnecessarily be treated, keeps debris out of the service lines which can cause blockages and leads to backups in the home, prevents small animals and rodents from entering the sewer system and helps prolong the life of the sewer system. *(see Attachment O).* 

#### 5. Sewer Service Line Replacement Program

The SSLRP was created by an ordinance passed in June 2012. On January 1, 2013, this ordinance was placed into effect to control I/I from a source LRWRA had no control over in the past. Studies have determined that as much as 40 percent of the excess water entering the collection system was coming from the private sewer services of homes, and many of these homes have had long-standing sewer service line issues that were too costly to repair by the homeowner alone. Since its implementation, there have been nearly 4,500 applicants to the program with nearly 3,000 complete replacements as of the end of 2021. The average cost of replacing a service line is \$3,500, for which LRWRA offers up to \$2,500 in reimbursement assistance. The funds supporting the program are collected from a \$1.00 monthly charge to the domestic customer and are held in an independent account. All funds in the account go directly back to our customers. An additional funding source was added in February 2016, allowing LRWRA to reimburse some homeowners (meeting more stringent guidelines) with money from the State of Arkansas Clean Water Revolving Loan Funds (RLF). In 2021, LRWRA issued over \$864,000 in homeowner reimbursements using these RLF monies. Since the program started in 2013, LRWRA has reimbursed over \$8 million back to customers participating in the program. This represents some 40 miles of service lines replaced, resulting in the removal of approximately 12.5 million gallons of I/I from our system annually. Before the implementation of this program, LRWRA met with the Arkansas Plumbers' Association and hosted an educational meeting informing local plumbers on how the program works and how to process these requests with LRWRA (see Attachment *G*).

#### 6. Opportunity Zones Incentive Program

To encourage and incentivize infill and redevelopment in areas where there is underutilized infrastructure, LRWRA has eliminated certain permit fees related to development in the affected areas. These affected areas include not only the four (4) federally-designated Opportunity Zones within the City of Little Rock but also southern parts the city. Beginning January 1, 2021, LRWRA suspended all Connection Fees, Inspection Fees, Building Sewer Seal Fees, and Street Excavation Fees in the affected areas for all Residential and Commercial developments. We believe this is a benefit to the environment because it represents increased use and improving the existing infrastructure as opposed to extending new infrastructure to serve new developments. In 2021, LRWRA suspended these fees for over 220 new connections for residences and commercial businesses in the Opportunity Zone areas, representing over \$100,000 of potential future annual revenue from these areas for LRWRA, based on the average monthly sewer bill.

#### 7. Private Sewer Line Cleaning Permit

This program is aimed at apartment complexes to coordinate their private sewer line cleaning with LRWRA to prevent downstream stoppages due to flushing debris and fats, oils, and grease (FOG) into the public mains. The program requires before cleaning their services, apartments contact LRWRA, obtain the free permit, use a debris catcher, and work with our crews to prevent overflows to residents downstream.

#### 8. Bill Inserts

Four (4) bill inserts were distributed in 2021. In March, LRWRA celebrated Women's History Month by featuring employees and a Little Rock Water Reclamation Commissioner, as part of the Women of Water campaign. In April the "Earth Day" insert was released which included details on LRWRA's commitment to protecting public health and the environment and announcing the semiannual Drug Take Back Day. The insert in November highlighted the *Can the Grease®* program and reminded residents that with all the cooking during the holidays, it's important to properly dispose of grease to help avoid backups into their homes. The "How to Read Your Bill" insert was released in December. *(see Attachment H)* 

#### 9. Awards

LRWRA received several awards and recognitions for contributions to the environment, financial reporting, procurement, and innovation. The awards LRWRA received are as follows:

#### (a) <u>Certificate of Achievement for Excellence in Financial Reporting</u>

The Government Finance Officers Association (GFOA) is a nonprofit professional association that serves approximately 19,000 professionals in the governmental finance field. The Certificate of Achievement for Excellence in Financial Reporting (CAFR) is the "highest form of recognition in governmental accounting and financial reporting" by the GFOA and is a "significant accomplishment by a government and its management." LRWRA's CAFR was judged by an impartial panel that looked for high standards of the program such as "demonstrating a constructive 'spirit of full disclosure' to clearly communicate its financial story and motivate potential users and user groups to read the CAFR."

This is LRWRA's seventeenth( $17^{\text{th}}$ ) consecutive year to accomplish this feat. (see *Attachment I*)

#### (b) <u>Distinguished Budget Presentation Award</u>

The GFOA of the United States and Canada awarded LRWRA the GFOA'S Distinguished Budget Presentation Award for its budget. The award represents a significant achievement by the entity. It reflects the commitment of the governing body and staff to meeting the highest principles of governmental budgeting. To receive the budget award, the entity had to satisfy nationally recognized guidelines for effective budget presentation. These guidelines are designed to assess how well an entity's budget serves as:

- a policy document
- a financial plan
- an operations guide
- a communications device

Budget documents must be rated 'proficient' in all four (4) categories, along with the 14 mandatory criteria within those categories to receive the award.

When a Distinguished Budget Presentation Award is granted to an entity, a Certificate of Recognition for Budget Presentation is also presented to the individual or department designated as being primarily responsible for its having achieved the award.

Award recipients have pioneered efforts to improve the quality of budgeting and provide an excellent example for other governments throughout North America. The GFOA is a nonprofit professional association serving approximately 19,000 government finance professionals throughout North America. The GFOA's Distinguished Budget Presentation Awards Program is the only national awards program in governmental budgeting. This is LRWRA's eleventh consecutive year to accomplish this feat. *(see Attachment J)* 

#### (c) Excellence in Achievement - Procurement

The LRWRA Procurement Department was presented the Excellence in Achievement Award for 2021 by the Universal Public Procurement Certification Council (UPPCC) for having a fully certified staff. The 2021 award is the thirteenth (13<sup>th</sup>) time LRWRA received this award. LRWRA Procurement is the only procurement department in the State of Arkansas to be honored with this award.

This award was created to acknowledge an agency's commitment to the value of certification in the public sector. Kathleen Muretti, Chair of the UPPCC Board of Directors, states that "This accomplishment speaks volumes of [this] agency's commitment and dedication to the profession and the skills and expertise that [LRWRA] bring[s] to the public procurement industry."

#### (d) National Association of Clean Water Agencies (NACWA) Award

LRWRA received national recognition from NACWA, the nation's leader in legislative, regulatory, and legal clean water advocacy. LRWRA received NACWA Peak Performance awards for all three water reclamation facilities (WRF). Peak Performance Awards are granted based on compliance with federal and state regulatory requirements. Fourche Creek WRF and Adams Field WRF earned the Peak Performance Platinum Award for five consecutive years of performance at the Gold level. Little Maumelle WRF earned a Peak Performance Gold Award. LRWRA takes pride in meeting daily, weekly and monthly regulatory permit limits set by both federal and state agencies.

#### 9. Outreach and Community Service

We build community partnerships and provide public outreach regarding our "One Water. One Future." commitment. One of the major success elements of our public awareness program is our outreach efforts. Despite the continual global pandemic, we were able to find ways to safely continue our Community Champions program by encouraging activities where employees were able to practice social distancing or were outside at events such as park cleanups . Participation in community events not only allows employees to give back to the community we serve but provides educational opportunities to residents on the importance of reducing grease in the sanitary sewer system and programs offered by the utility. Also, to better communicate with our residents, we increased our presence on social media platforms and saw a significant increase in online engagement.

#### (a) Partners in Education

LRWRA has teamed with local schools to aid and provide materials when needed and to help promote our public education programs. Since 1995, LRWRA has sponsored the Little Rock Central High (LRCH) STEM Fair by providing judges for the many categories, incentive awards, and other materials needed for event day logistics. LRCH teachers, PTA, and administration have been most appreciative of LRWRA's efforts in supporting environmental education, and LRWRA employees have been very responsive in volunteering. LRWRA also participated in the Volunteers in Public Schools virtual reading program, provided demonstrations and tours for students. We established a new partnership with J.A.Fair K-8 Preparatory Academy and as part of our partnership with Little Rock School District we donated two copies of *The Girl With a Mind for Math, The story of Raye Montague* to each elementary school in the district.

#### (e) Virtual Chat with Scientist

As part of our outreach around STEM, we hosted Dr. Kizzmekia Corbett in a virtual chat. Dr. Corbett was part of the leadership team instrumental in the groundbreaking research for the development of the Moderna COVID-19 vaccine. Students were able to ask questions about her journey in science and her path in becoming one of the country's leading research scientists.

#### (b) <u>Don't Flush That</u>

In response to the health crisis, we increased outreach efforts around the Don't Flush That campaign reminding residents not to flush wipes, paper towels and other items that are harmful to the system. These efforts resulted in radio and TV interviews on local stations.

#### (f) National Volunteer Week

During National Volunteer Week, we volunteered through the City of Little Rock's Impact the Rock Day by cleaning up Hindman Park and on Earth Day, we planted trees at McArthur Park with the Little Rock Parks & Recreation Department.

#### (c) Toy Drive for the Watershed

In December, LRWRA employees donated \$1,245 that was used to purchase toys. The items were donated to the Watershed Family Resource Center where they were distributed to children in Little Rock.

#### (d) Summer Cereal Drive with AR Food Bank

LRWRA helped the community through the Arkansas Food Bank. Employees donated enough money to purchase 1,063 boxes of cereal to provide breakfast for children with food insecurity.

#### 10. Media

LRWRA employees appeared on more than 11 radio and TV broadcasts promoting the *Don't Flush That* program and advertised in various local publications such as *Arkansas Times, El Latino* and *Arkansas Business*, to promote programs and public education campaigns (see Attachment L).

#### 11. Advertising

As part of LRWRA's Diversity, Equity and Inclusion efforts, efforts were made to ensure all material was diverse and that all areas of the city were included with proper messaging and imagery.

#### 12. Website

LRWRA continued to make improvements to the website, making it innovative and interactive with the latest news, updates, and information. The website, lrwra.com, enables visitors to view a calendar listing all LRWRC meeting dates, approved minutes of the Commission, and biographies of each Commissioner and Senior Staff. We also added a video link with our Core Value of the month to allow stakeholders to see how the core value is exhibited daily in our work. The site also includes interactive pages, general water reclamation facility information, ordinances, rate information, and much more. Ratepayers can also look at LRWRA's construction schedule to see dates and places of work to be performed.

#### 13. Facility Tours

LRWRA hosted a reduced number of water reclamation facility tours due to the health pandemic. However, some small groups were able to tour outside areas while practicing COVID safety requirements.

#### 14. Women of Water Campaign

LRWRA sponsored the WOW (Women of Water) campaign during the month of March, which is also women's history month. As part of the WOW campaign, four women from LRWRA and one Little Rock Water Reclamation Commissioner were featured on digital and print media, social media, radio ads, and made television appearances. The campaign celebrates female employees in the male dominated water industry. As part of the campaign, we also include activities in the schools. This year due to COVID, we provided a virtual movie to all 4<sup>th</sup> and 5<sup>th</sup> graders in the Little Rock School District about STEM and donated a STEM book to the elementary school libraries.

#### V. SUPPLEMENTAL ENVIRONMENTAL PROJECT'S AND OTHER LRWRA ENVIRONMENTAL EFFORTS

#### Friends of Fourche Creek

LRWRA continued its partnership with Audubon Arkansas and the Friends of Fourche Creek. The partnership is designed to help conserve and restore the natural ecosystem of Fourche Creek. LRWRA participated in a cleanup day, distributed *Can the Grease<sup>®</sup>* kits at the events, worked joint community booths and served on the Drain Smart committee that oversees the campaign to bring awareness to liter, which can eventually end up in Fourche Creek.

#### VI. 2021 NON-CAPACITY RELATED SANITARY SEWER OVERFLOWS

#### A. <u>Compliance Standard</u>

The Settlement Agreement limits the number of non-capacity related sanitary sewer overflows per 100 miles of sanitary sewer operated and maintained by LRWRA in LRWRA's collection and treatment system. The Settlement Agreement specifies the following 'interim schedule' for non-capacity related sanitary sewer overflows:

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

#### B. <u>Non-Capacity Related Sanitary Sewer Overflows in 2021</u>

There were 33 non-capacity related sanitary sewer overflows reported in 2021. Of the 33 totals, seven (7) sanitary sewer overflows were related to construction and vandalism. The result was a total of 26 non-capacity related overflows attributed to the operation

and maintenance of the LRWRA collection system. Of the 26 non-capacity related overflows, six (6) sanitary sewer overflows were attributed to debris; seven (7) sanitary sewer overflows were attributed to grease; two (2) sanitary sewer overflows were attributed to roots; two (2) sanitary sewer overflows were attributed to roots; two (2) sanitary sewer overflows were attributed to equipment failure. *(see Attachment M)* 

#### C. <u>Compliance Assessment</u>

LRWRA has reduced the number of non-capacity related sanitary sewer overflows attributed to the operation and maintenance of the collection system owned by LRWRA to below 6 per 100 miles of sewer lines for sixteen (16) 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, 2012 with a total of 49, 2013 with a total of 46, 2014 with a total of 36, 2016 with a total of 47, 2017 with a total of 33, 2009 with a total of 46, 2014 with a total of 36, 2015 with a total of 36, 2016 with a total of 47, 2017 with a total of 33, 2018 with a total of 17, 2019 with a total of 31, 2020 with a total of 30, 2021 with a total of 26. Therefore, under the Settlement terms in Paragraph No. 5, page 10, LRWRA is deemed to have complied with all provisions of this settlement related to non-capacity related sanitary sewer overflows.

		Number of Non-	Maximum Allowable Non-
		Capacity Related	Capacity Related Sanitary
Calendar	Miles of	Sanitary Sewer	Sewer Overflows
Year	Sewer	Overflows Per Year	(Based on 6 per 100 miles)
2004	1210	42	73
2005	1217	53	73
2006	1270	42	76
2007	1291	46	77
2008	1311	33	79
2009	1312	38	79
2010	1321	39	79
2011	1346	45	81
2012	1353	49	81
2013	1358	46	81
2014	1366	36	82
2015	1374	36	82
2016	1383	47	83
2017	1396	33	83
2018	1395	17	83
2019	1400	31	84
2020	1403	30	84
2021	1404	26	84

#### D. Additional Projects Not Covered by SECAP

In addition to the progress made on SECAP projects during 2021, LRWRA spent approximately \$4,368,174.60 renewing or replacing structurally deteriorated sewer mains. Old, deteriorated sewers are sources of I/I and are prone to blockage, contributing to both the number of capacity and non-capacity sanitary sewer overflows.

In a continued effort to maximize rehabilitation dollars, LRWRA treated 48,923 feet of mainline in 2021 with a contracted chemical root removal company with a total cost of \$84,028.51. Root removal is an important component of LRWRA's Plan 66 that targets sanitary sewer overflow reduction

LRWRA personnel completed work on 216-line segments that needed point repairs as well as relocated or replaced 6,385.64 feet of sewer line.

16,533 feet of sewer line was rehabilitated under the 2021 Trenchless Pipe Renewal contracts for pipe bursting and cured-in-place-pipe (CIPP), for a total cost of \$2,061,027.60

In 2021, the Cleaning and Inspection Division televised 431,355 feet, hand rodded 299,516 feet, Hydro Cleaned 1,131,839 feet, and Acoustically Inspected 5,520,688 feet of sewer lines.

#### VII. 2021 CAPACITY RELATED SANITARY SEWER OVERFLOWS

#### A. <u>Compliance Standard</u>

The Settlement Agreement requires capacity related sanitary sewer overflows be mitigated, provided sanitary sewer overflows 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 timeline for specific actions to address capacity related sanitary sewer overflows. The study would serve as the foundation for a long-term compliance program.

#### B. Capacity Related Sanitary Sewer Overflows in 2021

There were 71 capacity related sanitary sewer overflows reported in 2021 at 35 locations. There were eight (8) rain events recorded in 2021 measuring above the Design Storm which resulted in Twenty-five (25) capacity related overflows. The remaining forty-six (46) capacity related overflows occurring in 2021 resulted from seven (7) rain events measuring below the Design Storm threshold. *(see Attachment N )* 

#### VIII. CONCLUSION

LRWRA has remained committed to educating our customers and the stakeholders of Little Rock with programs available to assist with maintaining a healthy sewer system, preventing overflows, and projects that may affect the area they live or work in. Many of these programs have received national recognition over the years and continue to be successful in their intent. LRWRA strives to improve upon these programs and to develop new programs as the world of water reclamation changes through new technologies, regulations, and industry knowledge. Since the development of these programs LRWRA has seen a noticeable drop in the frequency and severity of sanitary sewer overflows.

Since the execution of the Settlement Agreement in 2001, LRWRA has come a long way in mitigating sanitary sewer overflows. LRWRA is taking a holistic approach to improving the current aging collection system by rehabilitating and replacing existing infrastructure that contributes to sanitary sewer overflows. In 2021, LRWRA continued with the large diameter assessment and rehabilitation program. This program will cover all 130 miles of mains that are 18 inches in diameter and larger. The established maintenance procedures and schedules continue to provide the desired results by minimizing mainline stoppages within the system through replacement of structural pipe failures. LRWRA is committed to protecting public health and being a good steward of the environment. The improvements LRWRA has completed or will complete will add years of life to the system. In other words, we are improving the system for future generations.

#### ATTACHMENT A. Sanitary Sewer Overflow Response Plan (Table A-1, Table A-2)

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# LRWRA: SANITARY SEWER OVERFLOW RESPONSE PLAN

The LRWRA Sanitary Sewer Overflow Response Plan (SSORP), or 'Plan', became effective on **September 30, 2002.** This plan is designed to ensure that every report of a confirmed sanitary sewer overflow (SSO) - also referred to as confirmed sewage spill, sewer overflow, overflow, or SSO - is immediately dispatched to the appropriate maintenance crew personnel so that the effects of the overflow can be minimized, with respect to the impacts on the environment, public health, integrity of the sewer collection system and treatment facilities, quality of surface waters, as well as customer service.

This plan further includes provisions to ensure safety, pursuant to the directions provided by the Arkansas Department of Environmental Quality (ADEQ), LRWRA's regulating agency/authority, and that proper notification and reporting is made to all appropriate levels of authority (local, state, and federal) in order to remain within compliance of all permit limits issued by ADEQ for the three (3) LRWRA Treatment Plants. For purposes of this SSORP document, *confirmed sewage spill'* is also sometimes referred to as *sewer overflow*, *overflow*, or *sanitary sewer overflow* or *SSO*.

### AUTHORITY

The Arkansas Department of Environmental Quality is the regulatory agency/authority that issues, monitors, regulates, and outlines the conditions of the National Pollutant Discharge Elimination System (NPDES) Permits for each of the three (3) LRWRA Facilities. The NPDES/AFIN information for each LRWRA facility is as follows:

	NPDES PERMIT ID	AFIN
AFWRF (ADAM'S FIELD)	AR0021806	60-00409
FCWRF (fourche creek)	AR0040177	60-01021
LMWRF (little maumelle)	AR0050849	60-04200

### PLAN OVERVIEW

### SSORP Objectives

The primary objectives of the SSORP are to protect public health and the environment, as well as to satisfy regulatory agencies and waste discharge permit (NPDES) conditions which address procedures Additional objectives of the Plan are to:

- Provide appropriate and best practices customer service
- Protect water reclamation treatment plant and collection system personnel;
- Protect the collection system, water reclamation treatment facilities, and all LRWRA assets
- Protect private property as well as public property expanding beyond the collection system and water reclamation treatment facilities

This Plan shall <u>not</u> supersede existing emergency plans nor Standard Operating Procedures (SOPs), unless directed by the LRWRA Chief Executive Officer (C.E.O.) for managing SSOs, and to minimize risk of enforcement actions against Little Rock Water Reclamation Authority ("LRWRA").

### ORGANIZATION OF PLAN

The key elements of the LRWRA Sanitary Sewer Overflow Response Plan are addressed individually within the following section of this document:

- Section 1: Overflow Response Procedure
- Section 2: Public Advisory Procedure
- Section 3: Regulatory Agency Notification Plan
- Section 4: Media Notification Procedure
- Section 5: Distribution & Maintenance of SSORP

### SANITARY SEWER OVERFLOW (SSO) RESPONSE TRACKING

A procedure to track the frequency, type, and location of SSOs has been prepared and can be found in Appendix A of this SSORP document, entitled *Appendix A – Procedure to Track an SSO*.

Data on each SSO occurrence is maintained in a database that can be analyzed, based on any recorded SSO parameter(s). The database is maintained and backed up on a regular basis by the LRWRA Information Services Department.

# Section 1: OVERFLOW RESPONSE PROCEDURE

The Sanitary Sewer Overflow Response Procedure (SSORP), or "Plan", presents a strategy for LRWRA 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.

## Subsection 1.A. Responding to a Report of Possible Overflow

An SSO may be detected by LRWRA employees or by others, such as members of the public, including, but not limited to, the citizens of Little Rock, guests of Little Rock, and other Little Rock utility organizations. The Collection System Maintenance Dispatchers are primarily responsible for receiving phone calls from the public reporting possible SSO occurrences within the water reclamation collection system and are also responsible for forwarding Work Requests Numbers and details to the Responding Maintenance Crew personnel.

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, with Emergency On-Call Response Crews responding to calls received after normal business hours. The Communications Department has a program in place for educating the public to report SSOs that they observe by providing a contact phone number for reporting the occurrence.

#### Subsection 1.A (a). Possible SSO Reported by a Member of the Public

LRWRA Collection System Maintenance Dispatchers obtain all relevant information available regarding the possible overflow from the member of the public reporting the possible SSO, to include the following details, if possible:

- When?
  - Date/Time the call was received
  - Date/Time reported spill was discovered
- Where?
  - Nearest Address/Intersection to the location of the spill
  - Specifics of spill location (i.e. front vs rear of property, etc.)
  - Ground surface type for reported spill (street; yard, drainage ditch etc.)

- Manhole spill vs. spill between manholes
- What?
  - Description of reported spill, with documentation of all observations described
  - Confirmation & description of any present odor
  - Duration of reported spill (active spill vs. inactive spill)
- Who?
  - Caller details to include name & telephone number at minimum
- Additional Details Reported
  - Documentation of any other relevant information that may enable the Responding Maintenance Crew(s) to quickly locate, assess, and determine if the spill is an SSO, and to take measures necessary to correct and contain a possible SSO

#### Subsection 1.A.(b). Possible or Confirmed SSO Reported by Treatment Plant

Pump station failures are monitored and received by Operators-on-Duty at the Adams Field, Fourche Creek, and Little Maumelle Water Reclamation Facilities. The Operator-On-Duty immediately conveys all information regarding alarms to the Superintendent of Facilities and Equipment to initiate the investigation. Water Reclamation Facilities Investigating Crew determines if the failure resulted in an overflow and then reports the findings to the Collection System Maintenance Dispatchers if an SSO has occurred. For proper documentation, a completed LRWRA Overflow Report Form shall be sent via e-mail to the 'OVERFLOWS' email group at <u>Overflows@Inwra.com</u> email address and the Collection System Maintenance Dispatch should be copied on all emails.

#### Subsection 1.A.(c). Possible or Confirmed SSO Reported by Other LRWRA Personnel

SSOs detected by any LRWRA personnel during their normal duties are reported immediately to the Collection System Maintenance Dispatchers who record all relevant SSO information and immediately dispatch the proper Maintenance Response Crew(s), as well as any additional Maintenance Crews as needed. The Response Crew may also contact additional maintenance crews identified to assist in the correction, containment, and/or cleanup of an SSO.

# Subsection 1.B. Confirming a Reported Spill as an SSO

Collection System Maintenance Crews confirm reported spills to be SSOs. Until verified, the report of a possible spill is not referred to as a sewer overflow, overflow, nor SSO. If an overflow has in fact occurred, the Maintenance Crew Leader is responsible for completing the proper LRWRA Overflow Report Form and for ensuring all maintenance personnel follow the guidelines outlined in the Plan. *See Figure 1.B.-1: SSO Response Tracking Protocol.* 

If the reported spill is confirmed to be an SSO by the Responding Maintenance Crew(s), the SSO confirmation and all related details of the SSO are reported back to the Dispatchers who record and input the SSO information into the LRWRA EAM database Work Request module. A Work Request number is created and communicated back to the Responding Crew(s) who will record the number on all SSO-related paperwork to track all response efforts and labor and to log all information relevant to the specific SSO occurrence.

The Dispatchers use various waterway-type layers within the GIS program to identify bodies of water to determine if an impacted waterway is an unnamed drainage ditch or a named waterway, which is necessary for determining the proper LRWRA Overflow Report Form to be completed and if an email notification to ADEQ within 24 hours is required. Some Response Crews also now have access to electronic tablets and/or Smart Phone apps with mapping capabilities that can aid in making such determinations.

A Red Overflow Report Form is used when an impacted drainage area is determined to be a named waterway (creek/stream/river), indicating environmental impact (ADEQ Environmental Damage Code of OEEI) or when the SSO involves observed or evidence of human contact (Environmental Damage Code of OEHC). A Black Overflow Report Form is used whenever there is NO evidence of environmental impact nor human contact evidenced or observed. *See Figures 1.A.-1: LRWRA (Black) SSO Report Form (revised 2/2/2018) & 1.A-2: LRWRA (Red) SSO Report Form (revised 2/2/2018)*.

	LITTLE ROC		
	RECLAMATION		
SANITARY SEW	ER OVERFLOW	OR BYPASS REPO	RTING FORM
SERVICE REQUEST NUMBER:			
REPORTED		ADDRESS:	
BY:			
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/Jet-Vac	DD = I	Disinfected & Deodoriz	ed/Environmental Cleanup
HR = Hand/Machine Rodded			cted Area/Environmental Cleanup
PN = Public Notification			ower Pumps/Equipment
WO = Work Order	EN = ?	Notify Engineering	
SSO DATA:			
DATE OF SSO:		TIME OF SSO:	AM or PM
LOCATION:		ADDRESS:	
CAUGE.			
	D – I	Delada	EE - Emission to ihum
RO = Root(s)			EF = Equipment Failure
RO = Root(s) G = Grease	LF =	Line Failure/Break	
RO = Root(s)           G = Grease           R = Rainfall/I&I	LF = HC -	Line Failure/Break = Hydro Cleaning	
RO = Root(s) G = Grease	LF = HC -	Line Failure/Break = Hydro Cleaning	
RO = Root(s)           G = Grease           R = Rainfall/I&I	LF = HC -	Line Failure/Break = Hydro Cleaning	
RO = Root(s)           G = Grease           R = Rainfall/I&I           CO = Construction	LF = HC = VA =	Line Failure/Break = Hydro Cleaning = Vandalism	<b>PF</b> = Power Failure
RO = Root(s)         G = Grease         R = Rainfall/l&I         CO = Construction         IMPACT OF SSO INCIDENT:	LF = HC · VA ·	Line Failure/Break = Hydro Cleaning = Vandalism	<b>PF</b> = Power Failure
RO = Root(s)     G = Grease     R = Rainfall/I&I     CO = Construction  IMPACT OF SSO INCIDENT:     GRPUB = SSO Reached Point	LF = HC · VA ·	Line Failure/Break = Hydro Cleaning = Vandalism	<b>PF</b> = Power Failure
RO = Root(s)         G = Grease         R = Rainfall/I&I         CO = Construction         IMPACT OF SSO INCIDENT:         GRPUB = SSO Reached Point         TP = SSO Occurred at Treat	LF = HC = VA = ublic Land Only atment Plant	Line Failure/Break = Hydro Cleaning = Vandalism	<b>PF =</b> Power Failure SO Reached Private Property
RO = Root(s)         G = Grease         R = Rainfall/I&I         CO = Construction         IMPACT OF SSO INCIDENT:         GRPUB = SSO Reached Product         TP = SSO Occurred at Treat         ACTIVE DISCHARGE:	LF = HC = VA = ublic Land Only atment Plant	Line Failure/Break = Hydro Cleaning = Vandalism GRPVT = S D (Evidence of Discharg	<b>PF =</b> Power Failure SO Reached Private Property
RO = Root(s)         G = Grease         R = Rainfall/I&I         CO = Construction         IMPACT OF SSO INCIDENT:         GRPUB = SSO Reached Properties         TP = SSO Occurred at Treat         ACTIVE DISCHARGE:         OBSERVED FLOWRATE;	LF = HC • VA • ublic Land Only trment Plant YESNO	Line Failure/Break = Hydro Cleaning = Vandalism GRPVT = S D (Evidence of Discharg ER MINUTE NOTE	<b>PF</b> = Power Failure SO Reached Private Property ge)
G = Grease R = Rainfall/I&I CO = Construction IMPACT OF SSO INCIDENT: GRPUB = SSO Reached Po TP = SSO Occurred at Treat ACTIVE DISCHARGE: OBSERVED FLOWRATE: ESTIMATED DURATION:	LF =     HC +     VA +     VA +     VA +     VA +     VA +     VES NC     GALLONS PE	Line Failure/Break = Hydro Cleaning = Vandalism GRPVT = S D (Evidence of Discharg ER MINUTE NOTE	<b>PF</b> = Power Failure SO Reached Private Property ge) 2: IF SSO is active when found, the actual

Figure 1.A.-1 LRWRA SSO Report Form (Black)\_Revised 2/2/2018

		R	evision Date: February 2, 2018
	LITTLE ROC RECLAMATION RY SEWER OVERFLOW O IS FORM, SEND AN EMAIL WI SSOADEQ@adeq.state.ar.u	AUTHORITY OR BYPASS REPORTING TH THE SSO DATE AND LO	
SERVICE REQUEST NUME	SER:		
CALL TIME:	AM or PM (circle one)	CALL DATE:	
RESPONSE DATA:			
CREW LEADER:			
	AM or PM		
	AM or PM	DATE:	
ACTION(S) TAKEN: HC = Hvdro-cleane	d/Jet-Vac DD = Disin	fected & Deodorized/Environn	nental Cleanup
	e Rodded LIME = Li		
PN = Public Notific	ation GPPE = G	enerator Used to Power Pumps/	Equipment
WO = Work Order	EN = Notif	y Engineering	
SSO DATA:			
DATE OF SSO:		TIME OF SSO:	AM or PM
LOCATION:		ADDRESS:	(circle one)
CAUSE: RO	D = Root D =	Debris	EF = Equipment Failure
G=	= Grease LF =		
R =	= Rainfall/I&I HC	= Hydrocleaning	
CC	D = Construction VA :	= Vandalism	
IMPACT OF SSO INCIDENT:			
CR = SSO Reached	Receiving Water (creek/stream/riv	ver) GRPUB = SS	O Reached Public Land Only
CB = SSO Containe	d in Building/Basement Backup	GRPVT = SS	O Reached Private Property
GRCB = SSO Read	h Ground Surface AND Building	TP = SSO Oc	courred at Treatment Plant
If CR, provide name of waterway:			
ACTIVE DISCHARGE:	YES NO	(Evidence of Discharge)	
OBSERVED FLOWRATI		MINUTE	SSO is active when found, the actual
ESTIMATED DURATION	N: MINUTES		y be greater than the known volume.
ESTIMATED VOLUME:	GALLONS		
IF "GRCB" IS CHECKED,	ESTIMATE GALLONS WITHIN	BUILDING:	
DAMAGE:	OEHC = Observed or Evider OEEI = Observed or Eviden EFK = Evidence of Fish Kill	ce of Environmental Impact	

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## SSO RESPONSE TRACKING PROTOCOL

When Maintenance Crew Confirms an SSO:

(Response Crew for Non-Capacity SSO + any crew that has the capability to open main line stoppages & stop the SSO)

- 1) Crew that locates overflow fills out Overflow Report Form:
  - a. <u>RED FORMS</u> are used when there is evidence of human contact or environmental impact (named waterway). When using this form, the responding crew leader shall send an email to <u>SSOADEQ@adeq.sate.ar.us</u> within 24 hours, stating the date and location of the SSO (per revised AFWWTP permit language). Dispatcher will use the Arc Map database to assist Responding Crew in determining if an SSO in a drainage area is either a ditch or a named waterway (creek/stream/river). If it is determined the fate is a named waterway, the SSO shall be reported on a <u>RED OVERFLOW REPORT FORM</u>.
  - <u>BLACK FORMS</u> are used when there is NO evidence of human contact and/or environmental impact (unnamed waterway).
- 2) Crew that locates overflow notifies Dispatch. Dispatch assigns a Service Number for tracking.
- 3) Response Crew (or Locating Crew) installs warning signs.
- 4) Response Crew (or Locating Crew) takes photographs before cleanup.
- 5) Response Crew cleans and sanitizes.
- 6) Response Crew verifies cleanup is done correctly. <u>If within a structure</u>, assures photos are taken within the structure, volume is estimated, **Customer Flood Report** is properly completed, and contact information for the Safety & Risk Administrator is provided if applicable (i.e. damage claims).
- Response Crew removes warning signs.
- 8) Response Crew (or Emergency Crew) takes photographs after cleanup.
- 9) Response Crew verifies that Overflow Report Form is turned in to Dispatch on the same day.
- 10) Dispatch downloads photographs into database.
- Dispatch enters overflow information into the SSO event database.
- 12) Plant Superintendent reports SSO data to ADEQ and other departments as required by the NPDES Permits.

## Subsection 1.C. Dispatching Maintenance Crews for SSO Response

Failure of any element within the water reclamation collection system that threatens to cause or causes an SSO triggers an immediate response to isolate and correct the problem. Maintenance Crews and equipment are available for response to any SSO location 24-hours/day, 7 days/week. Additional Maintenance Crews are designated "On Call" if additional support is needed. (See "Appendix B: SSO Action Plan".)

## Subsection 1.D. Dispatching Crews

Dispatchers receive notification of possible SSOs (as outlined in *Section 1.A* Responding to a Report of a Possible SSO) and dispatch an Emergency Crew or the appropriate area Response Crew as required.

Dispatchers notify the appropriate Manager(s) by phone regarding SSO details and field crew locations.

## Subsection 1.E. Crew Instructions and Work Orders

Responding Crews are dispatched by phone, and in some cases, the Work Request details are emailed to the Responding Maintenance Crew. The Dispatchers receive instructions from the Responding Crew(s) or their Manager(s) regarding the necessary additional crews/type of crews, and proper materials, supplies, & equipment needed to resolve the SSO and complete proper cleanup procedures.

Dispatchers verify that the entire message has been received and acknowledged by the additional dispatched Maintenance Crews. All standard communication procedures are followed. All employees being dispatched to the site of an SSO proceed immediately to the site of the overflow. Any delays or conflicts in assignments are reported immediately to the Manager for resolution.

In all cases, Response Crews report their findings to the available Manager immediately upon concluding their investigation findings. Information should include any and all possible damage to private and public property. If the Manager has not received findings from the Response Crew within one (1) hour, the Manager contacts the Response Crew to determine the status of the investigation.

## Subsection 1.F. Additional Resources

The Manager receives requests for additional personnel, material, supplies, and equipment from crews working at the site of an SSO and conveys the requests to the appropriate parties.

## Subsection 1.G. 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 LRWRA 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 Safety & Risk Administrator shall be notified and shall personally assess and document all damages as well as notify the Manager of the event. The Response Crew shall enter private property for purposes of overflow reporting.

**NOTE:** A Collections System Maintenance Manager can take the place of the Safety & Risk Administrator in damage assessment activities relating to the time-sensitive information in the case that the Safety & Risk Administrator is unable to be on site at that time. In this case, the Collection System Maintenance Manager will provide the customer with the Safety & Risk Administrator's business card. All communication regarding damage claims will take place between the property owner and the Safety & Risk Administrator. The crew shall take appropriate still photographs, if possible, of the area of the SSO and the impacted area to thoroughly document the nature and extent of impact.

## Subsection 1.H. Field Supervision and Inspection

The Responding Crew (or whomever confirmed the SSO), visits the site of the SSO, if possible, and takes photos before cleanup begins and installs temporary LRWRA warning signage to ensure that provisions of this LRWRA Overflow Response Plan and other directives are met.

## Subsection 1. I. 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) that is uncommon to the sewer system be detected. The Responding Crew should secure the immediate area and should contacts the Dispatcher or Safety & Risk Department (*See Appendix D: Collection System Spill Contacts*)

# **REMEMBER !!** Keep a safe distance and observe caution until assistance arrives: Any vehicle engine, portable pump, and/or open flame (e.g., cigarette lighter) can provide ignition for an explosion or fire, should flammable fluids/vapors be present.

Subsequent response actions should follow existing LRWRA procedures for **DETECTING HAZARDOUS ATMOSPHERES.** These procedures are outlined within the LRWRA Safety Manual & are also attached to this LRWRA SSORP (*Appendix C: Detecting Hazardous Atmospheres*). Only when the Safety & Risk Department deems it safe for personnel to resume activities can they proceed with SSO containment, clean-up, and correction activities.

## Subsection 1. J. SSO Correction, Containment, and Clean-Up

This section describes specific actions to be performed by Maintenance Crews during a confirmed SSO occurrence.

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

### Overflow Response Objectives:

- Protect public health, the environment, and property from sewage overflows and to restore the surrounding area back to normal as soon as possible;
- Promptly notify the regulatory agency of preliminary overflow information and potential impacts (within 24-hours if human contact or environmental impact apply);
- Contain the SSO to the maximum extent possible, including preventing the discharge of sewage into surface waters as possible; and
- Minimize LRWRA's exposure to any regulatory agency penalties and fines

Under most circumstances, LRWRA handles all response actions with its own Maintenance Department forces. Maintenance personnel are equipped with the skills and experience to respond rapidly and in the most appropriate and efficient manner. An important issue with respect to emergency response is to ensure that the temporary actions necessary to divert flows and repair the problem are methodical and 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 LRWRA could benefit from the support of private-sector construction assistance. This may be true in the case of large diameter pipes (e.g.  $\geq$  18") buried to depths requiring sheet piling and dewatering should excavation be required. LRWRA may also choose to use private-sector contractors to complete open excavation operations that might exceed one (1) day to complete.

## Subsection 1.K. Maintenance Crew Responsibilities Upon Arrival

It is the responsibility of the initial Responding Crew (or Locating Crew that finds and confirms the SSO) that first 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 LRWRA, LRWRA 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.), if possible
- Identifies and requests, if necessary, required 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 private property into the public right-of-way); and

**Note:** If Initial Response Crew confirms the SSO (i.e. Inspection Crew), it is their duty to contact the appropriate Response Crew (i.e. area Hand Rod Crew; area Hydro Clean Crew; Hydro Clean Rover Crew; Daytime Emergency Crew) for immediate arrival onsite so steps can be taken to stop the overflow, relieve pipeline blockage, etc.

 Requests additional personnel, materials, supplies, and/or equipment to best expedite minimizing the impact of the SSO.

## Subsection 1.K.(a) Containing the SSO

The following measures serve to contain and/or recover the overflowing sewage, and are initiated to minimize the impact to public health or the environment:

- Determine the immediate destination of the SSO. Dispatchers can use the GIS program to assist in determining if the impact of the SSO is a named waterway (creek/stream/river).
- 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 SSO into downstream manhole, etc.) if conditions allow, as determined by the LRWRA Maintenance Department.
- In the event an SSO has discharged into a creek, stream, or river, the following immediate measures to eliminate and contain the discharge and eliminate the chances as best possible from the SSO discharging into a creek/stream/river will be taken, which include:
  - Establishing bypass pumping of sewer to other areas of the collection system; or
  - Implement holding tanks until repairs can be made.

Be sure to 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, <u>immediate</u> <u>measures will be taken to contain and remove contaminants from the waterway as feasible.</u> 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 waterways to maintain adequate oxygen levels to preserve aquatic life until proper removal of contaminants is achieved.

### Subsection 1.K.(b) Additional Measures for 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 sewage flow.
- Implement continuous or periodic monitoring of the bypass pumping operation as required.
- Address regulatory agency-related issues in conjunction with making any emergency repairs.

## Subsection 1.K.(c) 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, see *Appendix E: SSO Permanent & Temporary Signage – Verbiage* for examples of postings.
- 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 approved waterway application that is designed to kill bacteria. If sewage has discharged into a body of water that may contain fish or other aquatic life, do not use bleach or other disinfectants and contact the Arkansas Game & Fish Commission.

Use of portable aerators may be required where complete recovery of sewage is not practical and where sever oxygen depletion in existing surface water is expected.

Do **<u>not</u>** use enzymes in flowing creeks, streams, or waterways

## Subsection 1.L. Overflow Report Form

Emergency Crew, Locating Crew, or Response Crew completes a LRWRA Sanitary Sewer Overflow or Bypass Report Form (*See Figure 1.A.-1 and Figure 1.A.-2*). The Crew promptly notifies Dispatcher when the SSO is eliminated.

There are two (2) types of LRWRA internal Overflow Report Forms: a **RED** Sanitary Sewer Overflow or Bypass Report Form & a **BLACK** Sanitary Sewer Overflow or Bypass Report Form (commonly referred to Overflow Report Forms). The impact of the SSO and/or the proper ADEQ environmental damage code that best describes the SSO at hand are used to determine the proper Overflow Report Form when reporting each SSO. ADEQ environmental damage codes and associated proper LRWRA internal Overflow Report Form are listed next for reference.

## Subsection 1.M. Completing the SSO Report Form

Subsection 1.M.(a)Environmental Damage / Impact of SSO:

**RED** LRWRA Overflow Report Forms are used to report SSOs involving the following impacts:

Observation or Evidence of Environmental Impact (ADEQ Environmental Damage Code OEEI): for example, an overflow that has reached / impacted a named waterway such as a named creek, stream, pond, or river. This includes all SSOs where there is indication that the SSO reached surface waters. For SSOs where sewage was observed running to surface waters, Emergency Crew / Response Crew / Locating Crew should complete a RED SSO Report Form (indicating ADEQ code "OEEI" – observed or evidence of environmental impact); this indicates all SSOs where sewage was observed running to surface waters, or where there was obvious indication (e.g. sewage residue) that sewage had flowed to surface waters.

If the overflow was contained in a named creek/stream/river/pond, the name of the waterway must be supplied. Dispatchers can utilize the GIS program to help in determining if the SSO reached a named waterway (creek/stream/river). There is a blank on the RED Overflow Report Form where the name of the waterway should be entered; this information is required for SSO entry in the EAM database when the fate of named waterway (CR) is selected.

<u>Observation or Evidence of Human Contact</u> (ADEQ Environmental Damage Code OEHC): for example, a building backup where sewer has reached / impacted the inside of a residence of business; or an overflow where person/persons were observed to have come in contact/ been impacted with the overflow

<u>Evidence of Fishkill</u> (ADEQ Environmental Damage Code EFK): for example, an SSO that reached /impacted a waterway where it is observed that there was Fishkill as a result (aquatic life was impacted as a result)

**BLACK** LRWRA Overflow Report Forms are used to report SSO impacts involving:

**NO** Evidence of Human Contact of Environment Impact (ADEQ Environmental Damage Code NEAH): for example, an SSO that did not reach a named waterway nor had any evidence of or observations of human contact involved such as most ground surface areas or drainage areas that are not named waterways.

#### <u>This includes:</u>

- SSOs where there is indication that the SSO had *not* reached surface waters. These
  include SSO occurrences such as the following, indicating ADEQ code NEAH evidence
  of environmental impact or human contact & thus can be used a guide to characterize
  such occurrences:
- SSO that runs 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.
- 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.

### **NOTE:** The Below Scenario is NOT an SSO:

Preplanned or emergency maintenance jobs involving bypass pumping (if access by the public to a bypass channel is restricted) and subsequent complete cleanup occurs leaving no residue.

Any preplanned bypass under these circumstances will not be considered an overflow.

The summary table below can be used to help in determining when to use a **RED** LRWRA Overflow Report Form vs. a **BLACK** LRWRA Overflow Report Form.

ADEQ Environmental Damage Code:	ADEQ Environmental Code Definition & SSO Description(s):	Type of LRWRA SSO FORM
OEEI	Observation or Evidence of Environmental Impact * <i>Description of SSO:</i> An overflow where the sewer spill has reached a named waterway (pond/ creek / stream / river, etc.)	<b>RED</b> Overflow Report Form
OEHC	Observation or Evidence of Human Contact *Description of SSO: an overflow where the sewer spill has reached the inside of a building structure such as a residence or a business or where it was observed that there were people walking / riding bicycles through the overflow area	<b>RED</b> Overflow Report Form
EFK	Evidence of Fishkill * <i>Description of SSO:</i> an overflow where the sewer spill has reached a waterway and aquatic life was impacted as a result / there was Fishkill present	<b>RED</b> Overflow Report Form
NEAH	NO Evidence of Environmental Impact or Human Contact *Description of SSO: an overflow where the sewer spill did not reach a named waterway nor had any evidence of human contact such as most ground surface areas or drainage areas that are not named waterways	<b>BLACK</b> Overflow Report Form

## Subsection 1.M.(b) TIME of SSO

The *TIME of SSO* field is a reporting requirement for all SSOs. It is a required field for completion on both types of internal Overflow Report Forms (Red and Black), as well as within the EAM database. There are differing ways to determine the *TIME of SSO*, and it is dependent upon if the SSO is capacity-related (wet weather; due to rainfall; main line is at capacity) or non-capacity related (dry weather; due to blockage or structural issue; main line is not at capacity and is surcharging for some other reason).

Thus, the *TIME of SSO* is determined one (1) of the following methods, depending on whether the SSO is capacity-related or non-capacity related:

## Capacity-Related Overflows:

A Rain Intensity Dashboard has been developed and will be utilized in determining the storm event category as well as the peak time of the event. This Rain Intensity Dashboard has been developed using the SCADA rainfall and historical rainfall intensity-duration-frequency (IDF) to depict each rainfall event. Engineering and Maintenance will be responsible for monitoring rain events. Events are categorized as Under 2-year Storm and Exceeds 2-year Storm. The Rain Intensity Dashboard shall be monitored during any rainfall and will be utilized to prompt SSORP protocol as well.

The determined *TIME of SSO* is sent via email to Collection System Maintenance Response Crews who begin checking manhole locations identified by Engineering personnel and are listed in *Appendix A: SSO Response Tracking Protocol Table A-2* of the SSORP. The *Time of SSO* is also communicated to Dispatchers and Maintenance Manager, Cleaning and Inspection Divisions.

The determined *TIME OF SSO* is consistently used by Response Crews on the LRWRA 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:

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 *ARRIVAL TIME* fields will be identical and will be recorded as such o the Overflow Report Forms as well as in the EAM database.

## Subsection 1.M.(c). COMPLETED DATE & COMPLETETD TIME of SSO

The date and time at which the SSO cleanup efforts have been completed and the after cleanup photo has been taken is the date and time information that should be entered in the *COMPLETED TIME* and *DATE* fields in the EAM database (and on the Overflow Report Form if available and not yet submitted to Dispatch, meaning the cleanup was completed the same day the SSO was reported.)

## Subsection 1.M.(d) ESTIMATED VOLUME of SSO

The VOLUME of SSO is figured by multiplying the FLOWRATE of SSO (GPM – gallons per minute) with the ESTIMATED DURATION OF SSO (MINUTES).

To establish the FLOWRATE OF SSO, one (1) of the flowing methods should be applied:

- Direct observation of the overflow: See Appendix F: SSO Flow & Volume Determination for guidance on estimating sewer overflow rates using visual indicators of the asset and SSO area.
- Measurement of actual overflow from the sewer main.
- Visual Observations.
- Pump Station and Lift Station flow charts and other recorded data that is available.

When the rate of the overflow is known, multiply the duration of the overflow by the overflow rate. When the rate of the overflow <u>not known</u>, investigate the surrounding area for evidence of ponding or other indications of overflow volume to obtain an *ESTIMATED FLOWRATE of SSO* and, thus, an *ESTIMATE VOLUME of SSO*.

## Subsection 1.N. Photographs of SSO

Maintenance Response Crew takes photographs of the SSO area before cleanup AND after cleanup, when possible. These are submitted to Dispatch and are uploaded into the LRWRA and EAM databases.

## Subsection 1.O. Assessment of any Damage

Assessment of any damage to exterior/interior of public/private property: Personnel shall enter private property for purposes of estimating or determining SSO volume. If permission to enter property, Maintenance Response Crew, as well as, other Collection System Maintenance field personnel, Collection System Maintenance Manager, Safety & Risk Administrator and/or Communications Coordinator should attempt to obtain photographs of the SSO and affected areas both before & after cleanup, as well as any affected area room measurements and flooring types A Customer Flood Report Form should be completed if possible, and the *VOLUME of SSO* should be noted in all areas possibly affected by the SSO.

## Subsection 1.P. Customer Satisfaction

When an SSO involving either observation or evidence of human contact (OEHC), observation or evidence of environmental impact (OEEI), or evidence of fishkill (EFK) is reported, the EAM database automatically notifies the Communications Department when all SSO information is entered into the database. The Communications Department will then contact the reporting citizen(s) and discuss the actions taken and the problem resolution. Upon notification of these SSO occurrences, the Communications Department, if necessary, takes any follow up action required (i.e. notify media or residents affected – *see Section 2: Public Advisory Procedures and Section 4: Media Notification Procedure.*)

If the resident wants to make a claim for damages incurred, they are directed to the Safety & Risk Administrator. For all SSOs where damages may possibly be incurred, Collection System Maintenance crews provide the citizen(s) with the Safety & Risk Administrator's business card with listed contact information. The crew also complete a Customer Flood Report Form which is submitted to Dispatch. Dispatch logs the Customer Flood Report information into the Hansen database on the Work Request *Log* tab and also notifies the Safety & Risk Administrator of the occurrence. The Safety & Risk Administrator informs the resident of LRWRA's damage claim process and current Damage Claim Policy and handles all damage claims in entirety.

## Subsection 1.Q. 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, then the initial SSO reported will be closed with associated details. (*This may happen when there are back-to-back category level rainfall events and MH location checks are still in progress for the first rain event at the time the second category level rain event takes place and causes a MH asset to overflow again before cleanup has been completed from the first overflow following the first rain event.)* The reoccurring SSO that has been confirmed will be recorded as another SSO incident with associated details.

If manhole locations listed in *Appendix A: Procedure to Track SSOs, Table A-2* of this document become inaccessible to LRWRA crews, the crew will conduct site visits daily until the site becomes accessible; crews will use an emergency call work order activity (CIEMER) to track the daily site visits/to document site conditions. If an SSO has in fact occurred once the manhole becomes

accessible, the same Work Request will be associated to the Emergency Work Order(s) (CIEMER) and to the SSO Work Order for tracking purposes. All associated work order numbers can be found associated to the same Work request number.

## Section 2: PUBLIC ADVISORY PROCEDURE

This section describes the actions LRWRA takes, in cooperation with the Arkansas Department of Environmental Quality (ADEQ) and the Arkansas Department of Health (ADH) to limit public access to areas potentially impacted by unpermitted discharges of pollutants to surface water bodies from the water reclamation collection system. Temporary and permanent public notices will be provided as indicated below. *See Appendix F: Signage SSO Permanent & Temporary Signage – Verbiage for verbiage on both permanent & temporary public notices.* 

## Subsection 2.A. Temporary public notice for polluted surface water bodies or ground surfaces that result from uncontrolled discharges from LRWRA facilities

LRWRA has the primary responsibility for determining when to post notices of polluted surface water bodies or ground surfaces that result from uncontrolled water reclamation 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.

*Figure 2.A.-1* (below) outlines the decision process to recommend to the Chief Operating Officer (COO) that posting of a confirmed SSO be undertaken of 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.

Figure 2.A-1. Decision Process to Post Temporary Signage for Polluted Surface Water Bodies or Ground Surfaces that Result from Uncontrolled Discharges from LRWRA Facilities

## Reported Overflow

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#### Step Event

- 1 Collection System Maintenance Division Manager 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 Manager dispatches *Investigator* to consult with CS Maintenance Division on remedial action & need/extent of posting
- 3 If Chief Operating Officer decides posting is required, Chief Operating Officer directs Collection System Maintenance Division to post warning signs & notifies the Communications Department of location & intent to post
- 4 Dispatched *Investigator* notifies Collection System Maintenance Division of assessment and makes recommendation on posting
- 5 Collection System Maintenance Manager consults Director/Chief Operating Officer (C.O.O.) for final decision on posting
- 6 If Chief Operating Officer (C.O.O.) decides posting is required, Chief Operating Officer (C.O.O.) directs Collection System Maintenance Division to post warning signs(s) & notifies the Communications Coordinator of intent to post and at which locations
- <sup>7</sup> Warning signs are installed by Collection System Maintenance personnel

#### 

#### Potential Overflow

\_\_\_\_\_\_ Step Event Reasonable potential for SSO that will result in ponded wastewater (ground surface 1 or ponding) or direct discharge to body-contact recreational waters between May 1 and September 30<sup>th</sup>, identified 2 Collection System Maintenance Superiors identifying potential SSO consults Chief Operating Officer (C.O.O.) for final decision on posting. 3 If Chief Operating Officer decides posting is required, Chief Operating Officer directs Collection System Maintenance Division to post warning signs & notifies the Communications Department of location & intent to post 4 Warning signs are installed by Collection System Maintenance personnel

## Subsection 2.B. Permanent Public Notice

LRWRA shall place a permanent notice at manholes located on City-owned property that may experience an SSOs in a twelve-month period. A list of applicable manholes has been provided in *Appendix A: Procedure to Track SSOs Table-A-1*.

## Subsection 2.C. Other Public Notification

If the Chief Operating Officer (COO) determines additional public notification is needed, the Communications Department will make said notifications under the C.O.O.'s direction.

## Section 3: REGULATORY AGENCY NOTIFICATION PLAN

The SSORP's Regulatory Agency Notification Plan establishes procedures that LRWRA follows to provide formal notice to ADEQ as necessary in the event of SSOs. The reporting criteria that are listed below explain to whom (agencies and individuals) various forms of notification should be made and also provide 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 4: SSORP Media Notification Procedure*. Internal notification and mobilization of personnel are detailed within the Overflow Response Procedure portion of the SSORP. (*See Section 1: Overflow Response Procedure*)

## Subsection 3.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 Water Reclamation Facility Superintendent then notifies and reports the SSO to ADEQ in compliance with LRWRA's NPDES Permits. For convenience, the AFWRF NPDES Permit reporting requirements are reprinted below.

"Overflows that <u>endanger health or the environment</u> shall be orally reported to the Enforcement Branch of the Office of Water Quality by telephone **(501-682-0638)** or by email, <u>ssoadeq@adeq.state.ar.us</u> within 24 hours from the time the permittee becomes aware of the circumstance." At a minimum, the following information shall be reported:

- 1. Permit number and AFIN
- 2. Location of overflow (address or MH ID)
- 3. Duration of overflow (minutes)
- 3. Estimated Volume of Overflow (gallons)
- *4. Receiving Water (if applicable)*
- 5. Cause of Overflow (if known)

A web written report of overflows shall be provided to ADEQ within 5 days of the 24 hours oral report. A 5-day follow-up written report can be filled-in and submitted on the ADEQ Office of Water Quality/Enforcement Branch Web page at:

https://www.adeq.state.ar.us/water/enforcement/sso/submit.aspx?type=s"

Collection System Maintenance Staff are responsible for meeting the 24-hour (oral or) online notification requirement. Per LRWRA NPDES Permit conditions, this 24-hour immediate notification to ADEQ is met for all overflows with environmental impact, which are those SSOs for which the ADEQ Environmental Damage codes OEEI (environmental impact/named waterway

impacted) and OEHC (human contact) are applied. In other words, for LRWRA internal reporting purposes, the 24-hour immediate notification to ADEQ is required or all SSOs that are reported properly on the LRWRA Red SSO Report Forms.

## ADEQ CONTACT(S):

The ADEQ Enforcement Analyst assigned to LRWRA is listed below, along with all contact details I am name, mailing address, e-mail address, and telephone number for LRWRA's primary ADEQ contact is provided below: (No changes for 2022 SSORP Annual Review).

Arkansas Department of Environmental Quality (ADEQ) Enforcement Analyst assigned to LRWRA (2022) Contact Details:

Leslie Allen-Daniels	5301 Northshore Drive	Telephone:
ADEQ Enforcement Analyst	North Little Rock, Arkansas 72218	501.682.0630

## Subsection 3.B. Secondary Notification

After those parties identified as requiring *Immediate Notification* have been contacted, the Chief Operating Officer (COO) will notify other federal, state, and local agencies, as well as other interested and possibly impacted parties (as directed by the COO)

## Section 4: MEDIA NOTIFICATION PROCEDURE

When an SSO has been confirmed and <u>is a threat to public health</u>, the following actions are taken, if necessary, to notify the media:

- Maintenance Response Crew verifies overflow & reports findings back to Dispatcher
- Dispatcher informs Communications Department, with primary contact being the Communications Coordinator (*see Table 4.A.-1. for contact information*)
- After-hours and weekend SSOs that are a threat to public health are also reported to the Communications Department at the contact numbers listed in *Table 4.A*.

## All media requests, if a request is in fact received, should be referred to the Communications Department.

Contact	Contact Name	Office	Mobile
Primary	Greg Ramon, Chief Executive Officer	501.688.1404	501.529.6340
Backup	Kenetta Ridgell, Communications Coordinator	501.688.1470	870.818.7993

## Table 4.A-1. Little Rock Water Reclamation Media Contacts

### LRWRA Media Spokespersons

The following LRWRA personnel are authorized to be interviewed by the media and are the designated spokespersons for LRWRA:

Chief Executive Officer (C.E.O.)
Communications Coordinator
Chief Operations Officer (C.O.O.)
Chief Legal Officer (C.L.O.)

## Section 5: 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.

## Subsection 5.A. Submittal and Availability of SSORP

Copies of the SSORP and any amendments are distributed to the following departments and functional positions as part of the annual SCAR (Attachment A of the SCAR):

<b>DEPARTMENT</b>	FUNCTIONAL POSITIONS
Legal Services	Chief Executive Officer, Chief legal officer
Engineering	Director, Engineering
MAINTENANCE	DIRECTOR, CHIEF OPERATING OFFICER (C.O.O.)
Operations	Director, Superintendents
EAD	Director

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

## Subsection 5.B. Review and Update of SSORP

**Review** of the SSORP is conducted annually and amended/**updated** as appropriate.

LRWRA should:

- Update the SSORP with issuance of a revised or new NPDES permit or state waste discharge permit (NPDES Permit renewals are reviewed at least annually)
- Conduct annual SSORP Training sessions with appropriate personnel, to include at minimum all Maintenance Staff involved in SSO reporting procedures and SSO response
- Review and update, as needed, the various contact persons and associated contact details listed throughout the SSORP (reviewed at least annually)

Along with the submittal of the annual Consent Administrative Order Report (Sierra Club Annual Report or SCAR), this SSORP document will be updated and submitted as Attachment A of the entire report.

## Subsection 5.C. Practical Resources

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

## Subsection 5.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 on 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 will be implemented in the next annual SSORP review.

## Appendix List

Appendix A: SSO Tracking Procedure

Appendix B: SSO Response Action Plan

Appendix C: Collection System Spill Contacts

Appendix D: Detecting Hazardous Atmospheres

Appendix E: SSO Signage

Appendix F: SSO Flowrate & Volume Determination

- Appendix G: Flowchart Process for SSO Reporting (External Source)
  - Appendix H: Flowchart Process for SSO Reporting (Internal Source)

## Appendix A: Sanitary Sewer Overflow (SSOs) Tracking Procedure

## SANITARY SEWER OVERFLOWS (SSOs) Tracking Procedure

The procedure to track the frequency & location of SSOs as follows:

#### Step 1:

All SSOs have a EAM -generated Work Order prepared within the database

#### Step 2:

SSOs will be defined as of the following:

#### CAPACITY SSOs:

Asset has insufficient carrying capacity to handle inflow and/or infiltration during a storm event; Engineering shall maintain & update a list of capacity-related SSOs.

Activity Code in EAM Database	Activity Code - Defined
SOC	= Sewer Overflow – Capacity
SOCP	= Sewer Overflow – Capacity – Private (overflow at a Privately-owned asset)

## NON-CAPACITY SSOs:

Overflow due to an obstruction in the main line, line failure, or equipment failures. Non-Capacity overflows also encompass private overflows at private assets and/or inside buildings, as well as ones outside of LRWRA control (due to vandalism or construction/BPU).

Activity Code in EAM Database	Activity Code – Defined
SONC	= Sewer Overflow – NON-Capacity
SONCP	= Sewer Overflow – NON-Capacity – Private (SSO at a privately-owned asset or inside building)
SONCO	= Sewer Overflow – NON-Capacity – Other (due to vandalism or construction damage)

### Step 3:

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 Work Request number will also be assigned by Dispatch for tracking all associated activities.

### Step 4:

A Monthly Report will be prepared, providing the number of capacity & non-capacity SSOs.

### Step 5:

In addition to Work Order data, information on all reported SSOs is maintained in an event database, called the Discharge Monitoring Report (DMR). It contains all information required for regulatory reporting and more. (total number of SSOs and total volume – gallons – per month). Reports generated from the database have the capability of pulling SSO locations based upon dates, assets. and occurrences within a time frame.

## Step 6:

The updated annual capacity-related SSO manhole list has been developed for inclusion in the Permanent Signage phase of this SSORP. This list is 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.

Collection System Maintenance personnel are responsible for removing/installing any signage necessary to reflect any updates made to Table A-1 each year.

Table A-1: SSOs Eligible for Permanent Signage (2022)

## Step 7:

A second list has been developed, and shall be maintained, by Engineering that defines each potential capacity related SSO location.

Rainfall amounts, recorded by the SCADA network at various stations throughout the collection system, are continuously reported to SCADA monitoring stations and to individual computers supported by SCADA-viewing software. A Rain Intensity Dashboard has been developed using the SCADA rainfall, and historical rainfall intensity-duration-frequency (IDF) to depict each rainfall event. Engineering and Maintenance will be responsible for monitoring rain events. Events are categorized as Under 2-year Storm and Exceeds 2-year Storm. The Rain Intensity Dashboard shall be monitored during any rainfall and will be utilized to prompt SSORP protocol.

The following list, *Table A-2*, provides the known, or suspected, SSO manholes that have the potential to discharge during wet weather events.

Collection system maintenance Crews proactively check all MH locations listed within Table A-2 upon receipt of notification from Engineering when the Rain Intensity Dashboard records a rain event, or upon receipt of an auto generated e-mail which is triggered when the recorded rainfall reaches 1-inch within a 24 hour period.

Status	Manhole	Area	5
Active	1B012	11502	Acti
Pending	1G008	30050	Per
Pending	1G010	30040	Per
Pending	1G087	30060	Per
Pending	1G090	30060	Per
Pending	1G091	30060	Acti
Active	2B068	11502	Per
Pending	2H018	30040	Per
Active	2H019	30040	Per
Active	2H074	30030	Per
Pending	2K142	30700	Acti
Pending	2K143	30700	Per
Pending	2K167	30700	Per
Pending	2M028	30400	Acti
Pending	20002	30501	Per
Active	20007	40030	Acti
Pending	20018	40702	Acti
Active	20025	30501	Per
Pending	20026	30501	Inve
Pending	2P012	40702	Per
Active	2P013	40702	Acti
Pending	2P014	40702	Per
Active	2P015	40702	Per
Pending	2P024	40702	Per
Active	2P025	40702	Per
Active	2Q020	40703	Per
Active	2Q021	40703	Per
Active	2R026	40703	Per
Pending	3D065	11501	Acti
Pending	3D108	11501	Inve
Pending	31036	30700	Acti
Pending	3K058	30700	Per
Pending	3K061	30700	Per
Pending	3M002	30400	Acti
Active	3N004	30501	Per
Active	3N005	30501	Per
Pending	3N006	30501	Per
Pending	3N007	30501	Per
Pending	3N055	30400	Per
Pending	30128	40702	Per
Active	4B003	10090	Per

#### Status Manhole Area 10090 tive 4B005 4L007 20030 nding 30300 nding 4L015 nding 4L017 20030 nding 4L076 20030 tive 4N013 40030 40030 nding 4N900 4N016 30400 nding 4N030 40702 nding nding 4N031 40702 4N089 30501 tive 5C002 10090 nding 10090 nding 5C003 5C007 10070 tive nding 5L030 20030 20030 tive 5L051 20030 tive 5L052 nding 5L059 20030 estigate 5L093 20030 10090 nding 6C001 10080 tive 6C004 10080 nding 6C006 11400 nding 6C036 nding 6C047 11400 nding 6E143 11102 nding 6E144 11102 nding 6G006 21303 21200 nding 6H049 tive 6L011 20030 estigate 6N006 40701 6N008 40701 tive 6N009 40701 nding 40701 nding 6N015 tive 6N016 40701 40701 nding 6N077 nding -7A053 60200 nding -7A065 60200 7C006 10080 nding 7K012 20020 nding 7K900 20020 nding nding 7K112 21100

Status	Manhole	Area
Pending	7K113	21200
Investigate	7N016	40600
Pending	-8-A012	60200
Active	-8-A015	60200
Pending	8C002	10080
Pending	8D034	11000
Investigate	8E047	11101
Investigate	8E048	11101
Pending	8E049	11101
Pending	8E061	11101
Active	8E114	11101
Active	8G020	10903
Pending	81006	20902
Active	80001	40600
Pending	90001	40501
Pending	-10-B009	60301
Pending	-10-B008	60301
Active	10G191	10902
Pending	101012	10901
Pending	10L013	20800
Pending	13J070	20401
Pending	13J087	20401
Pending	14G026	10010
Pending	14L038	30200
Active	16H003	10010

#### Table A-2 2022 Checklist

## Step 8:

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 (2) 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

#### SSO ACTION PLAN

#### **Dispatching Crews**

Dispatchers receive notification of possible SSOs from two sources:

- public (i.e. customers; guests of LR; other utility companies)
- internal crews (i.e. Maintenance Crews; Treatment Plant personnel)

### Notification of Possible SSO During Working Hours

Dispatchers receive notification of a possible SSO from the public at which time they collect all relevant information as outlined in *Subsection 1.A.(a): Possible SSO by a Member of the Public,* which at this point they dispatch one of our area Maintenance Response Crew to the site to verify if an SSO has occurred.

The Responding Maintenance Crew will report findings back to Dispatcher, who assigns a Work Request number for tracking and is used by all involved Maintenance Crews by documenting this number on all SSO-related paperwork and initiated work orders/inspections.

The Maintenance Response Crew determines if an SSO has occurred, and, if so, places warning signage at the site of the SSO (as well as at adjacent homes if required and available). The Dispatcher or Manager also verifies that the Responding Maintenance Crew has filled out a LRWRA Overflow Report Form and that all required information is on form. The Dispatcher can assist in determining if a RED or **BLACK** Overflow Report Form is the proper form to use when the by using GIS Arc Map mapping layers to determine if a drainage area is a named waterway; if a named waterway is impacted a RED form should be completed, indicating environmental impact. If the SSO occurs within a structure, a RED form should also be completed, indicating human contact – evidenced or observed.

Maintenance Crews at this point start cleanup and sanitize the site. When complete, the Maintenance Response Crew is to verify that the cleanup is completed, take after-cleanup photographs, and remove warning signs.

Maintenance Crews submit all SSO paperwork and any initiated Work Orders/Inspection to Maintenance Dispatchers (same day), who, at the start of the next business day, sort all SSO paperwork and work orders/inspections, ensure the SSO Report Form is completed correctly, and check to make sure the Work Request number is documented on all SSO paperwork and initiated Work Orders/Inspection, if any. Dispatchers are responsible for distributing the SSO Report Form to Dispatch this day. All Work Orders will be submitted to the Maintenance Manager, and all Inspections are provided to the Maintenance Planner.

Maintenance Crews submit all before-cleanup and after-cleanup photos to the overflows email group at <u>Overflows@Irwra.com</u> (if using a Smart Phone). If using a handheld camera, all photos are saved onto an SD Card and the card is provided to Collection System Maintenance Staff (*See Figure 1.B.-1: SSO Tracking Protocol*).

For all SSOs reported on RED Overflow Report Forms, Collection System Maintenance Staff is responsible for submitting the required 24-hour email notification to ADEQ, with all required information regarding the details of the SSO occurrence. *(See Subsection 3: Regulatory Agency Notification)*.

## Notification of Possible SSO After Hours

The After-Hours Emergency On-Call Crews (who manage all incoming phone calls after normal business hours via the On-Call cell phone, to which all incoming calls to the main LRWRA Dispatcher Office phone number are forwarded) receive notification of a possible SSO from the public at which time they collect all relevant information as outlined in *Subsection 1.A(a): Possible SSO Reported by a Member of the Public*, and then proceed to the location.

The Emergency On-Call Crew determines if an SSO has occurred, attempts to correct the problem and contain the SSO, places warning signs at the site as well as at adjacent homes if required, and takes before-cleanup photographs. The crew is to fill out a LRWRA Overflow Report Form which is submitted with their paperwork at the beginning of the next workday. All photos are submitted to the overflows email group at <u>overflows@lrwra.com</u>.

The Emergency On-Call Crew then starts cleanup and sanitizes the site (if possible). When cleanup is completed, the crew is to take after photographs and then remove warning signs.

If the SSO occurred within a structure, the Maintenance Manager 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 workday after the overflow occurrence. The Safety & Risk Administrator will be informed as well to handle any damage claims.

## Internal Notification:

Personnel in the field who find an SSO are to contact the Dispatcher and provide the relevant information as outlined in *Subsection 1.A.(a): Possible SSO Reported by a Member of the Public.* The same procedure as shown for public notification under working hours will be used – *See first part of this document, Appendix B: SSO Action Plan.* 

Rain events that are one (1)-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 Appendix A: SSO Tracking Protocol, Table A-2*) which has been determined as being locations that have the potential to overflow. The Maintenance Responding 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.

## **Collection System Spill Contacts**

IN THE EVENT OF A KNOWN SPILL OR DISCHARGE OF HAZARDOUS MATERIAL INTO THE LITTLE ROCK SANITARY SEWER COLLECTION SYSTEM, IMMEDIATE CONTACT SHOULD BE MADE TO OUR 24-HOUR EMERGENCY CREW AT 223-1509

IN THE EVENT THAT A FLAMMABLE OR OTHER EXTREMELY HAZARD SUBSTANCE IS RELEASED INTO THE SANITARY SEWER SYSTEM PLEASE CALL THE *LITTLE ROCK FIRE DEPARTMENT (911)* 

IN ADDITION, PLEASE CONTACT (ASAP) ONE THE STAFF MEMBERS LISTED BELOW SO A FOLLOWUP INVESTIGATION CAN BE CONDUCTED.

Megan Jones, Pretreatment Administrator

Work: 501-688-1495

Mobile: 479-216-0961

Jamie Ewing, Director of Environmental Assessment

Work: 501-688-1486

Mobile: 870-917-7463

Michael Kline, Safety & Risk Administrator

Work: 501-688-1468

Mobile: 501-352-0513

Adams Field Water Reclamation Facility (24 hour)

1001 Temple Street

Operations: 501-688-1533

Mobile: 501-413-7381

Fourche Creek Water Reclamation Facility (24 hour)

9500 Birdwood

Operations: 501-490-5405

Mobile: 501-541-3559

(Revised 2018)

## Appendix D: Detecting Hazardous Atmospheres

DETECTING HAZARDOUS ATMOSPHERES

(Chapter 9 of the LRWRA Safety Manual pg. 65)

#### **Purpose**

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

#### Procedures

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

#### Step 1

The LRWRA employee(s) or crew discovering the potential health or safety hazard must notify dispatch (223-1509) or the Environmental Health & Safety [Safety & Risk] Department (688-1468 or 688-1466) to report the potential problem.

Information included in the report:

- Name of the employee making the report
- Street address or location or potential hazard
- Manhole number (if known)
- Brief description of findings (submit verbally or via e-mail)

If the health or safety hazard was reported to dispatch: dispatch should contact the Environmental Health & Safety [Safety & Risk] Department and report the above information.

#### Step 2:

The Environmental Health & Safety [Safety & Risk] Department will then investigate the report.

#### Step 3:

If Environmental Health & Safety [Safety & Risk] Department confirms the report, the Environmental Health & Safety [Safety & Risk] Department will notify Dispatch to ALERT all affected field crews that the reported area is "Off Limits" until further notified. The Environmental Health & Safety [Safety & Risk] Department will notify ALL other affected LRWRA & 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 Clearwater Complex. Dispatch will also forward a copy

of the notice to the Environmental Health & Safety [Safety & Risk] Department for placement on the other Safety News Bulletin Boards throughout LRWRA.

## Step 5:

The Environmental Health & Safety [Safety & Risk] Department will notify Central Arkansas Water dispatch of the Potential Hazardous Area.

## Step 6:

If the investigation suspects a Natural Gas Leak, the SAFETY [Safety & Risk] Department will contact CenterPoint/Reliant Energy to report the situation.

## Step 7:

The Environmental Health & Safety [Safety & Risk] Department will keep ALL effected LRWRA & CAW departments informed of the situation and monitor their (CenterPoint/Reliant Energy) findings.

### Step 8:

Once the health or safety hazard has been corrected, the Environmental Health & Safety [Safety 7 Risk] Department will perform a follow-up investigation and when NO HAZARDOUS conditions exist, the SAFETY [Safety & Risk] Department 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, the Environmental Health & Safety [Safety & Risk] Department will contact the Environmental Assessment Department (EAD) and transfer the report for further action.

### **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 the Environmental Health & Safety [Safety & Risk] Department 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.

If a hazardous atmosphere is detected after normal working hours, that is suspected to contain gasoline, solvents, paint, or other foreign material and the hazardous area is located in an

Industrial/Commercial Area, follow the procedures (found in Chapters 9 & 16 of the LRWRA Safety Manual Collection System Spill Contacts (revised 2018) & Detecting Hazardous Atmospheres.

# Appendix E. SSO Permanent & Temporary Signage - Verbiage

# TEMPORARY SSO 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:



LRWRA

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

See SSORP Table A-2 for a list of manhole locations that Maintenance Crews will check following a rain event.

# LRWRA Overflow Signage Verbiage

\_\_\_\_\_

# LRWRA 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

# **PERMANENT** SSO Signage

The below language shall be used on signs for possible SSO sites that are located on publicly owned property and which have the potential to occur within a twelve (12)-month period.

\_\_\_\_\_

See SSORP Table A-1 for a list of manholes requiring permanent SSO signage throughout 2022 that was provided by the Engineering Department

# Appendix F: SSO Flow & Volume Determination

# SSO FLOW & 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 ultimate 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 (3)-category rating system is outlined below:** 

\*\* GPM = Gallons Per Minute

# 1 – 10 GPM

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.

# 11 – 100 GPM

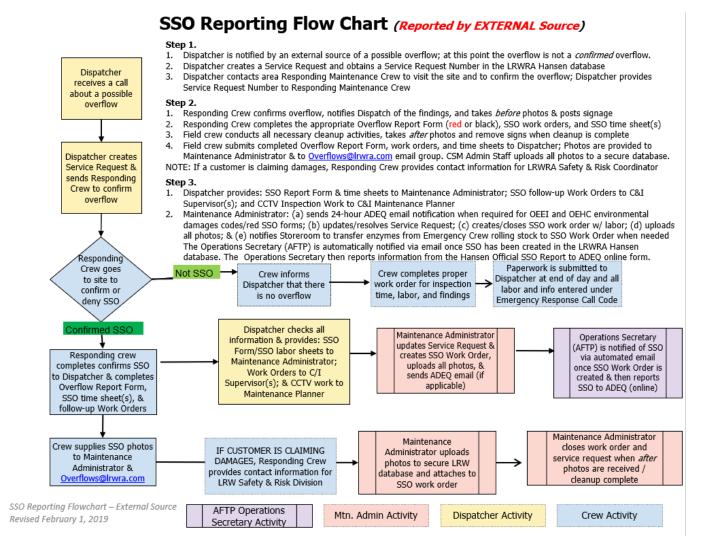
This rate covers the moderate discharge experience in the lower reaches of the collection system, usually along the larger collector or outfall type sewer mains (typically 10" and larger mains) and in some capacity related SSOs. The **visual indicator** would be a noticeable flow from around the manhole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

# > 100 GPM

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.

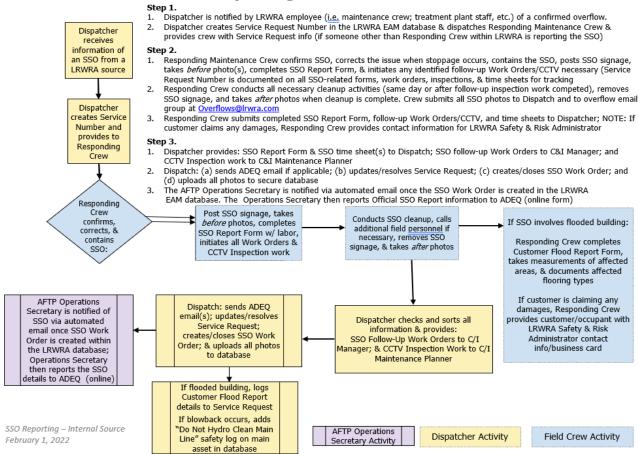
SSO volumes are derived from the above category multiplied by the duration of discharge. If the exact length of discharge is unknown, criteria for determining an estimated time have been established in the Section 1.M(d).: Completing the SSO Report Form.

# Appendix G: Flowchart Process for SSO Reporting (External Source)



# Appendix H: Flowchart Process for SSO Reporting (Internal Source)

# SSO Reporting Flow Chart (Reported by INTERNAL Source)



# --- End of LRWRA SSORP ---

Revised February 3, 2020

# ATTACHMENT B. Notice of Sanitary Sewer Overflow – Temporary Signage



# ATTACHMENT C. Door Hanger



Mitigate sanitary sewer overflows by enrolling in Little Rock Water Reclamation Authority's Can the Grease® program. This program allows you to receive one grease

can and lid, heat-resistant liners, 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.

 Once the bag is full, take it out and toss it in the trash. Place another liner in the can.

Signing up is easy, too. You can request a FREE Can the Grease® Kit by calling 501.688.1490 or visit us online at Irwu.com/ctg.

Vater Reclamation

uthority SNE WAYER.

Little Rock Water Reclamation Authority 11 Clearwater Drive Little Rock, AR 72204 501.688.1490

# NOTICE

# Dear Customer:

In an increasing effort to provide our customers with exceptional service, protect public health and the environment and continue our preventive maintenance program, our crews are working in your area.

PLEASE CONTACT US. We need to discuss the following with you:

Check an existing manhole

 Perform routine inspection/maintenance on an existing line or manhole

Grease-related stoppage

 Sewer Service Line Replacement Program – up to \$2,500 reimbursement

Other

For more information contact Customer Assistance

501.688.1490

Today's Date:

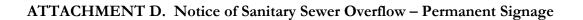
Work Order # \_\_\_\_

Line Segment



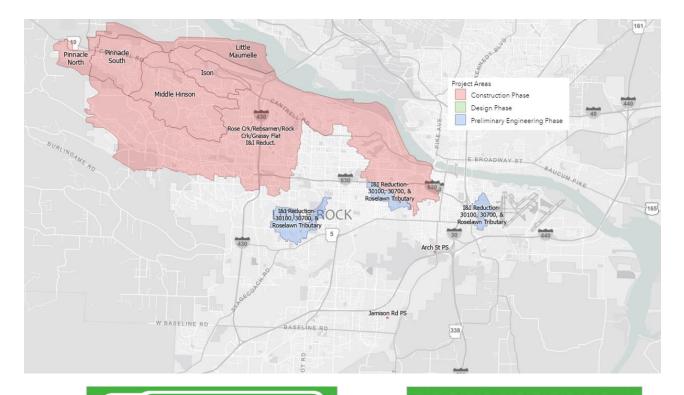
Water Reclamation







# ATTACHMENT E. Project RENEW



# About Acoustic Inspection (AI)

WHO: Little Rock Water Reclamation Authority (LRWRA) is responsible for inspecting and maintaining 1,400 miles of sewer system, 32,000 manholes and serves a population of approximately 200,000.



# WHAT to Expect:

LRWRA employees are conducting Acoustic Inspections (Al) on the sewer collection system in your neighborhood. The inspections take approximately 3-5 minutes. Employees will need access to manholes and are prepared to work with customers as needed. Workers will not need access into your home to complete the inspection. During the inspection, sound waves are sent from the transmitting device to the receiving device. The sound waves detect obstructions within the sewer collection system. The sound waves can be heard but are not typically loud or disruptive. Employees will also be in uniform

and company marked vehicles for ease of recognition.





# Acerca de la inspección acústica (Al)

# QUIÉN:

Little Rock Water Reclamation Authority (LRWRA) es responsable de inspeccionar y mantener aproximadamente 1,400 millas del sistema de alcantarillado y 32,000 pozos de visitas, y presta sus servicios a una población de aproximadamente 200,000 personas.



# QUÉ esperar:

Los empleados de LRWRA están realizando inspecciones acústicas (Acoustic Inspections, AI) en el sistema colector de alcantarillado en su vecindario. Las inspecciones toman aproximadamente de 3 a 5 minutos. Los empleados necesitarán tener acceso a los pozos de visita y están preparados para trabajar con los clientes cuando sea necesario. Los trabajadores no necesitarán tener acceso a sus hogares para completar la inspección. Durante la inspección, las ondas acústicas se envían desde el dispositivo transmisor hasta el dispositivo receptor. Las ondas acústicas detectan las obstrucciones dentro del sistema colector de alcantarillado. Las ondas acústicas pueden escucharse pero normalmente no ocasionan un ruido fuerte ni perturbador. Los

empleados también estarán uniformados y en vehículos identificados con la marca de la compañía para reconocerlos fácilmente.



# ATTACHMENT F. Can the Grease<sup>©</sup>



# It's easy. It's free. CAN THE GREASE<sup>™</sup>

# WHY?

Anything that goes down the drain comes to LRWRA's water reclamation facilities through shared pipelines all throughout the city. Grease and fats, especially from cooking, clog pipes. This doesn't just impact pipes maintained by LRWRA—this could clog pipes on your property that you are responsible for.





# WHAT CAN YOU DO?

LRWRA doesn't want ratepayers to bear the financial burden of clogged pipes. That's why we supply our Can the Grease™ starter kit free of charge. It comes with an aluminum can, heat-resistant liners, and an informational packet to help you keep your pipes clog free.

# **ANYTHING ELSE?**

Keep in mind that some foods produce grease naturally when you cook them. Make sure to can those greases and fats as well. You should also avoid flushing the following items down your drain. They can damage the pipes or the water supply we all share.

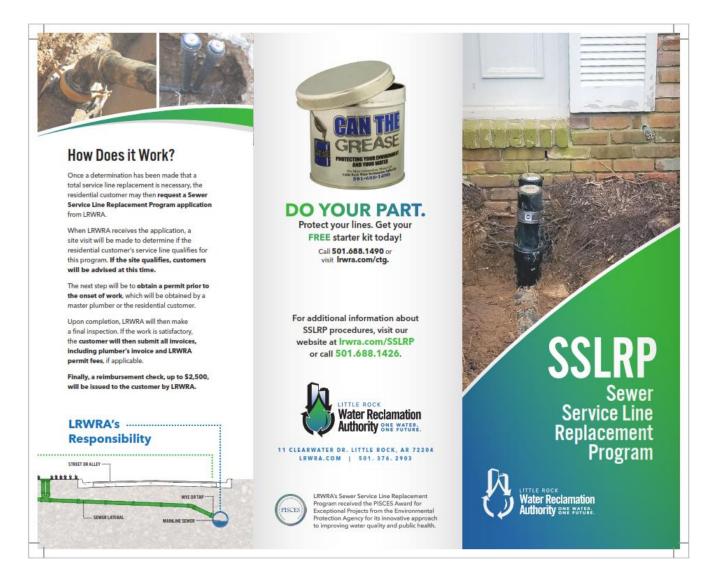
- Medication (pills, creams, etc.)
- Automotive fluids
- Car wax
- Paint, glue, and thinner
- Poison and/or insecticides
- Kerosene and/or lighter fluid
- Moth balls

- Oven, floor, or furniture cleaners
- Primer
   Fertilizer
- Nellaborad
- Nail, shoe, and/or metal polish
- Battery acid
- Fiberglass epoxy
- Photographic chemicals
- All wipes

# CALL 501.688.1490 TODAY FOR YOUR FREE STARTER KIT.

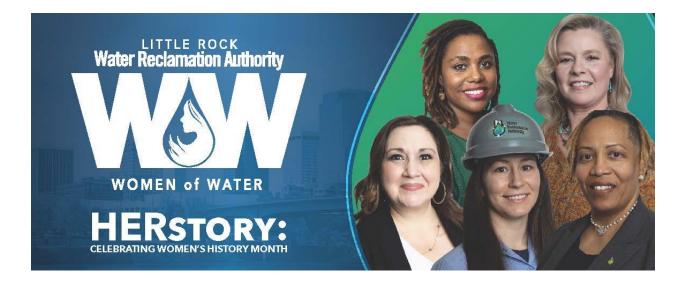
# Can the Grease® Enrollment Name Address \_ Telephone number Please return card to: Little Rock Water Reclamation Authority 11 Clearwater Drive • Little Rock, AR 72204

# **ATTACHMENT G. SSLRP Brochure**





# ATTACHMENT H. Bill Inserts



LRWRA proudly celebrates the diversity of our highly-skilled team of water heroes. In recognition of Women's History Month, we highlight just a few of our female associates for their contributions to protecting public health and the environment. Our 'Women of Water' play an important role in our water reclamation processes which help Little Rock thrive!

Join us in having a WoW moment! Learn more about our Women of Water, their positions and our diverse people and processes at **Irwra.com/wow**.

Follow us on social media to keep up with our latest reminders, tips and events.

■ elter lock water lectamation Authority ■ @LRWRA © @l.r.w.r.a



Water Reclamation Authority

11 CLEARWATER DR. LITTLE ROCK, AR 72204 | LRWRA.COM | 501. 376. 2903



# MAKE EVERY DAY EARTH DAY

At Little Rock Water Reclamation Authority, our focus is One Water, One Future. Our commitment to maintaining safe and clean water is evident through our efforts to renew our

sewer infrastructure and help Little Rock thrive. Join the mission, and do your part to protect public health, the environment, and the Earth!



11 CLEARWATER DR. LITTLE ROCK, AR 72204 | LRWRA.COM | 501. 376. 2903











# ATTACHMENT I. Certificate of Achievement for Excellence in Financial Reporting



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Government Finance Officers Association

# Certificate of Achievement for Excellence in Financial Reporting

Presented to

# Little Rock Water Reclamation Authority Arkansas

For its Comprehensive Annual Financial Report For the Fiscal Year Ended

December 31, 2019

Christophen P. Morrill

Executive Director/CEO

ATTACHMENT J. Distinguished Budget Presentation Award



GOVERNMENT FINANCE OFFICERS ASSOCIATION

# Distinguished **Budget** Presentation Award

PRESENTED TO

# Little Rock Water Reclamation Authority Arkansas

For the Fiscal Year Beginning

January 01, 2021

Christopher P. Morrill Executive Director

ATTACHMENT K. UPPCC Agency Certification Award Letter



October 15, 2018

Mrs. Amber Yates, CPPB Procurement Administrator Little Rock Wastewater 11 Clearwater Drive Little Rock, AR 72204

Dear Mrs. Amber Yates, CPPB:

On behalf of the Universal Public Procurement Certification Council (UPPCC), it is my privilege and honor to publicly name Little Rock Wastewater, Arkansas as a 2018 recipient of the UPPCC Agency Certification Award in the small agency category. Congratulations!

As you may know, this award was created to formally recognize an agency's commitment to the value of certification in the public sector. Your organization is a fine example of what is becoming a strong indicator of success within state and local governments. This accomplishment speaks volumes of your agency's commitment and dedication to the profession and the skills and expertise that you bring to the public procurement industry.

The enclosed framed certificate should be displayed with pride as such an achievement brings increased credibility and recognition to your entity - an accomplishment that should be highly regarded by your elected officials and the citizenry that you serve.

I hope that your agency will continue its commitment to professionalism in public procurement and strive for even greater recognition as a UPPCC Sterling Agency. The "Sterling Agency" award program recognizes agencies that not only achieve the UPPCC Agency Certification Award but maintain it for three consecutive years. The UPPCC Sterling Agency Award is automatically issued to an agency upon achievement of the UPPCC Agency Certification Award for the third consecutive year. Don't forget that the UPPCC Agency Certification Award is an annual award that you must apply for each year. For more information, please visit our website at www.uppcc.org.

Again, my sincere congratulations to Little Rock Wastewater, Arkansas and the entire procurement team for a job well done.

Sincerely,

Kathleen Muretti, CPPO, CPPB Chair, UPPCC Board of Directors

2201 Cooperative Way, Suite 600 + Herndon, VA 20171 USA + T 800.884.6073 + certification@uppcc.org + www.uppcc.org

# ATTACHMENT L. Media

# LITTLE ROCK WATER RECLAMATION AUTHORITY RENEWING INFRASTRUCTURE FOR GENERATIONS TO COME

Little Rock Water Reclamation Authority (LRWRA) **strives to protect and reclaim our most precious natural resource – water**. Along with continued preventive maintenance and renewing the city's aging sewer infrastructure, we have many other efforts to protect public health and the environment. Our work at LRWRA ensures Little Rock remains vibrant for years to come.

For more information on LRWRA's improvement projects and how you can join us in this effort, visit Irwra.com.



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# LITTLE ROCK WATER **RECLAMATION AUTHORITY**

# ECUPERAR. STAURAR. P

La Autoridad de Recuperación de Agua de Little Rock se compromete a preservar nuestra Agua Única. Un futuro. Utilizamos procesos de tratamiento de agua que nos ayudan a garantizar que el agua que recuperamos supere los niveles de calidad estándar antes de que se restaure al río Arkansas. Nuestros procesos premiados nos ayudan a cumplir con nuestra misión de proteger la salud pública y el medio ambiente.

# ¡ÚNETE A LA MISIÓN Y HAZ TU PARTE!

Tenemos varios programas ecológicos que ayudan a los contribuyentes a hacer su parte para proteger nuestro sistema de alcantarillado compartido. Para obtener más información, visite LRWRA.com/programs.





#### CAN THE GREASE: (Lata la grasa)

Proporciona una lata de grasa GRATUITA y revestimientos resistentes al calor para la eliminación ade-cuada de grasas y aceites de cocina que obstruyen las tuberías. Para obtener más información, llame al 501.688.1490 o visite LRWRA.com/ctg.



Proporciona una tapa de limpieza GRATIS a los contribuyentes para mantener los escombros fuera de las líneas de servicio, lo que ayuda a reducir los atascos en los hogares y prolonga la vida útil del sistema de alcantarillado. Para obtener más información, llame al 501.688.1470 o visite LRWRA.com/capthecleanout.

¿Ha tenido problemas con el servicio de su alcantarillado?

Por favor llámenos primero al 501.223.1509.



#### SSLRP:

or i stubble

Proporciona a los propietarios hasta \$2.500 en reembolsos para el costo de reemplazo de las líneas de servicio de alcantarillado privadas. Para obtener más información. llame al 501.688.1420 o visite LRWRA.com/sslrp.



DON'T FLUSH THAT: (No descargues eso) Descubra lo que no debe tirarse por el desagüe para evitar obstrucciones, atascos y reparaciones costo-sas. Para obtener más información, visite LRWRA.com/dontflushthat.



11 CLEARWATER DR. LITTLE ROCK, AR 72204 | LRWRA.COM | 501.376.2903

# LITTLE ROCK WATER RECLAMATION AUTHORITY

# SALUTES WOMEN-OWNED BUSINESSES

The Little Rock Water Reclamation Authority proudly supports the women-owned businesses in our city. We believe strong communities are created by contributions from all residents, and we salute the role business women play in helping our city thrive.

To learn more about our commitment to supporting local businesses and innovative processes, visit LRWRA.com.

Our vendor portal has changed! Visit Irwra.com/business-center to become or re-register as a vendor.





11 CLEARWATER DR. LITTLE ROCK, AR 72204 | LRWRA.COM | 501. 376. 2903

# Were Reclamation Toilet root Toile

We know. Small children love exploring the toilet. Make sure you keep the lid down and invest in a lid lock to prevent toys from going down the drain. Besides, you don't want your little ones to lose their favorite toy to the toilet.

Just one more way you can do your part to protect our shared sewer system, public health and the environment:







Little Rock Water Reclamation Authority

# LITTLE ROCK WATER RECLAMATION AUTHORITY

# PRESERVING WATER FOR GENERATIONS TO COME

Little Rock Water Reclamation Authority (LRWRA) **strives to protect and reclaim our most precious natural resource – water.** Along with continued preventive maintenance and renewing the city's aging sewer infrastructure, we have many other efforts to protect public health and the environment. Our work at LRWRA ensures Little Rock remains vibrant for years to come.

Visit **Irwra.com** to learn more about how we protect the One Water we all share.

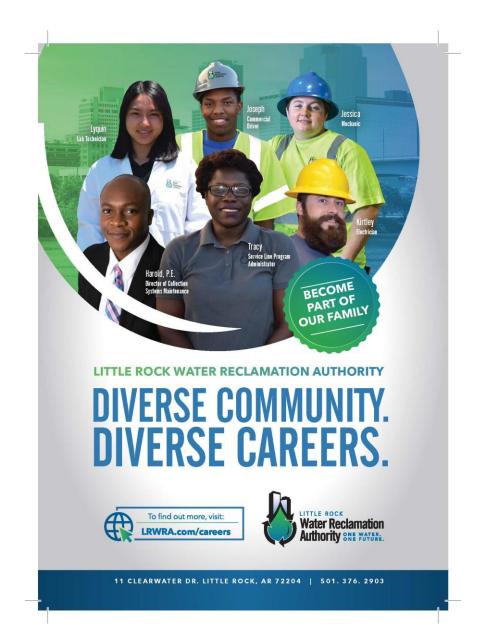




Water Reclamation Authority SNE WATER.

11 CLEARWATER DR. LITTLE ROCK, AR 72204 | 501. 376. 2903







# 11 CLEARWATER DR LITTLE ROCK AR 72204 | LRWRA COM | 501 376 2903

#### WHO:

Little Rock Water Reclamation Authority (LRWRA) is responsible for maintaining 1,400 miles of sewer system; 32,000 manholes and serves a population of 200,000.

# WHAT TO EXPECT:

LRWRA employees are conducting Acoustic Inspections (AI) on the sewer collection system in your neighborhood. The inspections take approximately 3-5 minutes. Employees will need access to manholes and are prepared to work with customers as needed. However, workers will not need access into your home to complete the inspection. During the inspection, sound waves are sent from the transmitting device to the receiving device. The sound waves detect obstructions within the sewer collection system. The sound waves can be heard but are not typically loud or disruptive. Employees will also be in uniform and company marked vehicles for ease of recognition.

### WHY?

To efficiently maintain the 1,400 miles of sewer collection system, LRWRA utilizes the Acoustic Inspection activity as part of its annual preventive maintenance program. The Acoustic Inspection identifies system deficiencies related to a broken pipe, blockages due to roots, grease, or general debris collected in the pipe. The results of the inspection determine the priority of corrective action necessary to ensure continued reliable service for LRWRA customers.

# WHEN WILL WORK BEGIN?

Work is scheduled to begin in your area around September 24, 2019.

If you have any questions please give us a call at: (501) 688-1470. To watch a video on Acoustic Inspections go to Irwra.com/AcousticInspection



11 CLEARWATER DR. LITTLE ROCK, AR 72204 501. 376. 2903 LRWRA.COM



# AYUDE A EVITAR INTERRUPCIONES DEL SERVICIO, AHORRE DINERO Y PROTEJA EL MEDIO AMBIENTE **BUENAS PRÁCTICAS DE GESTIÓN DE COCINA**













**NO** VIERTA EL ACEITE

DE COCINA EN EL DESAGÜE.

(UD)

NO QUITE LAS REJILLAS DE LOS DESAGÜES.

SÍ INSTALE REJILLAS

DE LA COCINA.

EN TODOS LOS DESAGÜES



SI LAVE LOS TAPETES EN UN FREGADERO.



NO LAVE LOS TAPETES FUERA.

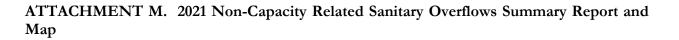
**NO** VIERTA LOS RESIDUOS DE COCINA O LAVE OLLAS **GRASOSAS EN EL FREGADERO** ANTES DE LAVAR EN SECO.

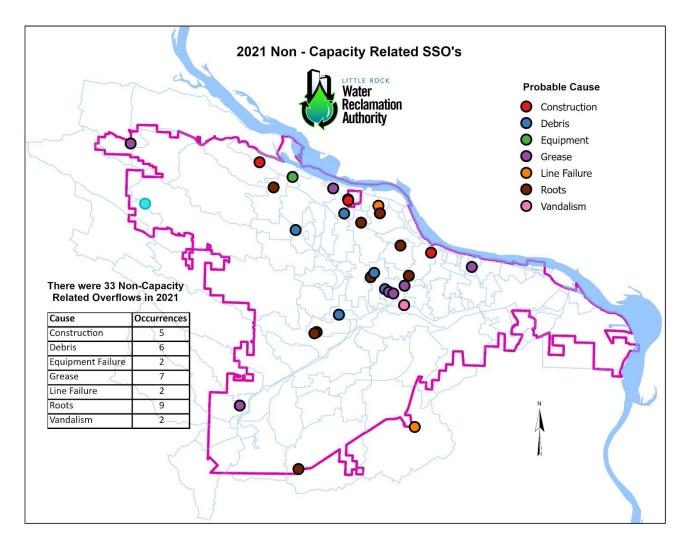


DE COMIDA EN EL DESAGÜE.



G No FOG.





#### LITTLE ROCK WASTEWATER UTILITY NON-CAPACITY SANITARY SEWER OVERFLOW REPORT 1/1/2021 - 12/31/2021

CODE DESCRIPTIONS				
NPDES PERMIT	CAUSE(S) OF SSO	OBSERVED ENVIRONMENTAL IMPACT	ACTION(S) TAKE N	ULTIMATE DISCHARGE LOC.
FC - Fourche Creek Treatment Plant NPDES Permit No. A 80040177	CO - Construction D - Debris	EFK - Evidence of Fish Kill	DD -Disinfected & Deodorize	CB - Contained in Building
	E - Equipment Failure	NEAH - No Evidence of Adverse Health or Environmental Impacts	EN - Reporting to Engineering	CR - Creek/Stream/River
AF - Adams Field Treatment Plant	G . Grease	OEHC - Observed or Evidence of Human Contact	HC - Hydro Cleaned	GRCB - Both Ground/ In Building
NPDES Permit No. AR0021806	HC - Hydro-Clean	OEE1 - Observed or Evidence of Environmental Impact	HR - Hand Rodded	GRPUB - Reached Public Property
LM - Little Maumelle Treatment Plant	LF - Line Failure		LIM E -Lime Applied	GRPVT - Reached Private Property
NPDES Permit No. AR0050849	PF - Power Failure		PN - Public Notification	TP - Occurred at Treatment Plant
	RO - Roots		WO - Work Order	
	VA - Vandalism			

NPDES PERM IT	LO CATIO N	MANHOLE NO.	DATE OF SSO	TIME OF SSO	ESTIM AT ED DURATION, MIN	ESTIM AT ED VOLUME, GAL	CAUSE OF SSO	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKEN TO ADDRESS SSO	ULTIMATE DISCHARGE LOCATION
AF	11 VARENNES CT	-12D087	01/20/2021	2:12 pm	30	60	VA	NEAH	PN, WO	GRPUB
AF	12380 SOUTHRIDGE DR	-3 A00 9	05/25/2021	10:00 am	30	90	со	NEAH	EC, PN, WO	GRPUB
AF	3300 BROWN ST	8K.017	07/01/2021	11:30 am	30	90	VA	NEAH	EC, PN, WO	GRPUB
AF	6801 GREENWOOD RD	4C090	09/26/2021	11:15 am	30	60	со	NEAH	EN, PN	GRPVT
AF	6721 KENWOOD RD	4C 09 1	09/28/2021	11:45 am	30	90	co	NEAH	EC, PN, WO	GRPVT
AF	6723 KENWOOD RD	4C091	10/03/2021	2:35 pm	15	30	со	NEAH	PN, WO	GRPVT
AF	DO NOT HYDRO CLEAN - CAN NOT	10G-05-6	12/02/2021	10:01 am	30	30	со	NEAH	EC, PN, WO	GRPVT
				COUNT	of OTHER (	OVERFLOW S:	7			
FC	10803 IRONTON CUTOFF RD	~9U013	01/06/2021	12:30 pm	30	60	LF	NEAH	EN, PN, WO	GRPVT
AF	1402 S VAN BUREN ST	61010	01/12/2021	12:30 pm	30	60	D	NEAH	EC, PN	GRPUB
AF	5 HEARTHSIDE DR	2B042	01/12/2021	4:30 pm	10	10	G	NEAH	PN	GRPUB
FC	13400 HEINKE RD	0X 004	01/14/2021	10:45 am	60	300	RO	NEAH	PN, WO	GRPVT
AF	BACKFLOW PREVENTER	3D079	02/01/2021	10:15 am	30	150	D	NEAH	EC, PN, WO	GRPUB
AF	610 E 6TH ST	13H086	02/19/2021	10:55 am	30	30	G	NEAH	PN, WO	GRPUB
AF	Longfellow pump station	6D 00 1	02/25/2021	8:30 am	30	30	LF	NEAH	EN, PN, WO	GRPUB
AF	LAT 34-48-41.04414, LON	-14-A001	03/04/2021	7:30 pm	15	150	G	NEAH	EC, PN, WO	GRPUB
AF	1700 S T YLER ST	51117	04/01/2021	10:00 am	60	60	RO	NEAH	EC,WO	GRPVT
AF	2105 BROWN ST	8J131	04/07/2021	10:15 am	30	120	G	NEAH	EC, PN, WO	GRPUB
AF	11420 ROCKY VALLEY DR	-2C005	05/10/2021	11:30 am	30	120	RO	NEAH	EC, PN, WO	GRPVT
AF	BACKFLOW PREVENTER	3D079	05/13/2021	3:30 pm	30	30	D	NEAH	EC, PN, WO	GRPUB
FC	4 WESTFIELD DR	-45028	05/15/2021	10:00 am	30	60	G	NEAH	PN, WO	GRPVT
AF	8609 WESTWOOD AVE	1N008	06/10/2021	4:00 pm	20	20	RO	NEAH	PN, WO	GRPUB
AF	1615 N UNIVERSITY AVE	5E048	06/22/2021	8:45 pm	30	30	RO	NEAH	PN, WO	GRPUB

Page 1 of 2

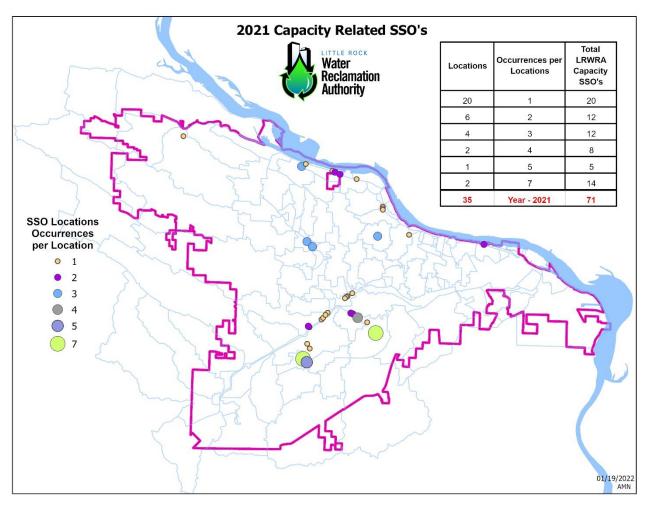
#### LITTLE ROCK WASTEWATER UTILITY NON-CAPACITY SANITARY SEWER OVERFLOW REPORT 1/1/2021 - 12/31/2021

CODE DESCRIPTIONS NPDES PERMIT	CAUSE(S) OF SSO	OBSERVED ENVIRONMENTAL IMPACT	ACT ION(S) TAKE N	ULTIMATE DISCHARGE LOC.
FC - Fourche C reek Treatment Plant NPDES Permit No. A 80040177 A F - Adams Field Treatment Plant NPDES Permit No. A 80021806	CO - Construction D - Debris E - Equipment Failure G - Grease HC - Hydro-Clean	EFK - Evidence of Fish Kill NEAH - No Evidence of Adverse Health or Environmental Impacts OEHC - Observed or Evidence of Human Contact OEEI - Observed or Evidence of Environmental Impact	DD -Disinfected & Deodorize EN - Reporting to Engineering HC - Hydro Cleaned HR - Hand Rodded	CB - Contained in Building CR - Creek/Stream/River GRCB - Both Ground/ In Building GRPUB - Reached Public Property
LM - Little Maumelle Treatment Plant NPDES Permit No. A 80050849	LF - Line Failure PF - Power Failure RO - Roots VA - Vandalism		LIM E -Lime Applied PN - Public Notification W O - Work Order	GRPVT - Reached Private Property TP - Occurred at Treatment Plant

NPDES PERMIT	LO CATIO N	MANHOLE NO.	DATE OF	TIME OF SSO	ESTIM AT ED DURATION, MIN	ESTIM AT ED VOLUME, GAL	CAUSE OF SSO	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKE N TO ADDRESS SSO	ULTIMATE DISCHARGE LOCATION
AF	8411 WESTWOOD AVE	1N004	07/21/2021	9:00 am	60	300	RO	NEAH	EC, PN, WO	GRPUB
AF	484 RIDGEWAY DR	8G131	07/22/2021	9:20 am	60	180	RO	NEAH	EC, PN, WO	GRPUB
AF	4501 W 24TH ST	61098	08/12/2021	8:40 am	10	10	D	NEAH	PN	GRPUB
AF	9800 N RODNEY PARHAM R D	0F139	09/16/2021	11:45 am	30	90	D	NEAH	EN, PN, WO	GRPUB
AF	CHANGE CLEANING SCHEDULE TO	6D042	09/21/2021	10:20 am	30	30	RO	NEAH	PN, WO	GRPVT
AF	3915 W 26TH ST	7J154	09/22/2021	6:30 pm	30	60	G	NEAH	EC, PN, WO	GRPVT
AF	DOWNSTREAM IS PUMP STATION	-1B007	10/29/2021	9:30 am	30	30	Е	NEAH	EC, PN	GRPUB
AF	DOWNSTREAM IS PUMP STATION	-1B007	11/01/2021	1:30 pm	30	30	Е	NEAH	EC, PN, WO	GRPUB
AF	4213 W 25TH ST	7J130	11/08/2021	4:30 pm	5	5	G	NEAH	EC, PN, WO	GRPUB
AF	102 GREENCREST DR	3L038	12/15/2021	2:30 pm	30	30	D	NEAH	PN, WO	GRPVT
AF		81093	12/20/2021	10:00 am	30	30	RO	NEAH	PN, WO	GRPUB
			с	OUNT of	MANHOLE	OVERFLOWS:	26			

COUNT of NON-CAPACITY OVERFLOWS: 33

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ATTACHMENT N. 2021 Capacity Related Sanitary Sewer Overflows Summary Report and Map

# LITTLE ROCK WASTEWATER UTILITY CAPACITY SANITARY SEWER OVERFLOW REPORT 1/1/2021 - 12/31/2021

#### CODE DE SCRIPTIONS NPDE S PE RMIT

FC - Fourche Creek Treatment Plant NPDES Permit No. AR0040177

# OBSERVED ENVIRONMENTAL IMPACT NEAH - No Evidence of Adverse Health or Environmental Impacts

EFK - Evidence of Fish Kill

OEHC - Observed or Evidence of Human Contact

CAUSE(S) OF SSO

R - Rainfall

ACTION(S) TAKE N WO - Work Order

HR - Hand Rodded

# ULTIMATE DISCHARGE LOC.

CR - Creek/Stream/River EC - Environmental Cleanup D1 - Ditch HC - Hydro Cleaned DR - Drop Inlet GR - Ground Surface EN - Reporting to Engineering PN - Public Notification PA - Paved Area CB - Contained in Building GR/CB - Building and Ground

AF - Adams Field Treatment Plant NPDES Permit No. AR0021806

LM - Little Maumelle Treatment Plant NPDES Permit No. AR0050849

NPDE S PE RMIT	L OCAT ION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	E ST IMATED DURATION, MIN	E ST IMATE D VOLUME, GAL	CAUSE OF	OBSERVED ENVIRON. IMPACT	ACTION(S) TAKE N T O ADDRESS SSO	ULT IMATE DI SCHARGE L OCATION
FC	6100 MURRAY ST	80001	01/25/2021	12:00 pm	10	100	R	NEAH	EN, PN, WO	GRPUB
AF	Rebsamen Park rd	6C004	01/25/2021	12:00 pm	10	50	R	NEAH	EC, EN, PN	GRPUB
AF	Rebsamen Park	4B003	02/28/2021	4:00 pm	5	50	R	NEAH	EN, PN	GRPUB
AF		1B012	02/28/2021	6:00 pm	10	200	R		EN, PN	CR
FC		2P013	02/28/2021	6:00 pm	20	200	R	NEAH	EN, PN	GRPUB
AF		5L052	02/28/2021	6:00 pm	20	200	R	NEAH	EN, PN	GRPUB
AF		6L011	02/28/2021	6:00 pm	25	500	R	NEAH	EN, PN	GRPVT
FC	16 ROSEMOOR CT	6N008	02/28/2021	6:00 pm	30	300	R	NEAH	EN, PN	GRPVT
AF	1701 REBSAMEN PARK RD	8E047	02/28/2021	6:00 pm	60	180	R	NEAH	EN, PN, WO	GRPUB
AF	322 S VALENTINE ST	8G020	02/28/2021	6:00 pm	20	100	R	NEAH	EN, PN	GRPUB
FC	37 ELMHURST DR	6N006	02/28/2021	6:00 pm	30	30	R	NEAH	EN, PN, WO	GRPVT
AF	5207 WESTERN HILLS AVE	3N005	02/28/2021	6:00 pm	25	500	R		EN, PN	CR
FC	5207 WESTERN HILLS AVE	4N013	02/28/2021	6:00 pm	30	300	R		EN, PN	CR
AF	5207 WESTERN HILLS AVE	4N089	02/28/2021	6:00 pm	30	300	R		EN, PN	CR
FC	6100 MURRAY ST	80001	02/28/2021	6:00 pm	20	200	R	NEAH	EN, PN	GRPVT
FC	7500 W 65TH ST	20007	02/28/2021	6:00 pm	30	600	R		EN, PN	CR
AF	7500 W 65TH ST	20025	02/28/2021	6:00 pm	30	300	R		EN, PN	CR
FC	7909 MCDANIEL DR	2Q020	02/28/2021	6:00 pm	10	100	R	NEAH	EN, PN	GRPVT
FC	7909 MCDANIEL DR	2Q021	02/28/2021	6:00 pm	20	200	R	NEAH	PN	GRPVT
FC	9401 IN TERSTATE 30	2R.026	02/28/2021	6:00 pm	20	200	R	NEAH	EN, PN	GRPVT
FC	BACK WATER FLOW VALVE	6N016	02/28/2021	6:00 pm	20	200	R	NEAH	EN, PN	GRPVT
AF	coleman creek	5L051	02/28/2021	6:00 pm	20	200	R	NEAH	EN, PN	GRPUB
AF	coleman creek	5L093	02/28/2021	6:00 pm	20	1,000	R	NEAH	EN, PN	GRPUB
FC	EQ basin	7N016	02/28/2021	6:00 pm	60	30,000	R	NEAH	EN, PN	GRPVT

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#### LITTLE ROCK WASTEWATER UTILITY CAPACITY SANITARY SEWER OVERFLOW REPORT 1/1/2021 - 12/31/2021

#### CODE DE SCRIPTIONS NPDE S PE RMIT

FC - Fourche Creek Treatment Plant NPDES Permit No. AR0040177

OBSERVED ENVIRONMENTAL IMPACT NEAH - No Evidence of Adverse Health or Environmental Impacts OEHC - Observed or Evidence of Human Contact

EFK - Evidence of Fish Kill

CAUSE(S) OF SSO

R - Rainfall

ACTION(S) TAKE N

WO - Work Order

HR - Hand Rodded

HC - Hydro Cleaned

EN - Reporting to Engineering

PN - Public Notification

ULTIMATE DISCHARGE LOC. CR - Creek/Stream/River EC - Environmental Cleanup D1 - Ditch DR - Drop Inlet GR - Ground Surface PA - Paved Area CB - Contained in Building GR/CB - Building and Ground

AF - Adams	Field	Treatment Plant
NPDES	Perm	it No. AR0021806

LM - Little Maumelle Treatment Plant NPDES Permit No. AR0050849

NPDE S PE RMIT	LOCATION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	E ST IMATE D DURATION, MIN	E ST IMATE D VOLUME, GAL	CAUSE OF	OBSERVED ENVIRON. IMPACT	ACT I ON(S) TAKE N T O ADDRE SS SSO	ULT IMATE DISCHARGE LOCATION
AF	Fourche Creek	3N004	02/28/2021	6:00 pm	30	600	R		EN, PN	CR
AF	Kanis Park	2H019	02/28/2021	6:00 pm	10	250	R	NEAH	EN, PN	GRPUB
AF	LINE TIES INTO 24" LINE BELOW	8E048	02/28/2021	6:00 pm	60	130	R	NEAH	EN, PN, WO	GRPUB
AF	OPEN CHANNEL FLOWMONITOR IN	16H003	02/28/2021	6:00 pm	50	500	R	NEAH	EN, PN	GRPVT
AF	rebsamen park	5C007	02/28/2021	6:00 pm	10	200	R	NEAH	EN, PN	GRPUB
AF	Rebsamen Park	4B005	02/28/2021	6:00 pm	10	200	R	NEAH	EN, PN	GRPUB
AF	1420 REBSAMEN PARK RD	8E114	03/17/2021	11:00 am	30	300	R	NEAH	EN, PN	GRPUB
FC	16 ROSEMOOR CT	6N008	03/17/2021	11:00 am	30	300	R	NEAH	EN, PN	GRPVT
AF	201 GILL ST	10G191	03/17/2021	11:00 am	30	300	R	NEAH	EN, PN	GRPUB
AF	322 S VALENTINE ST	8G020	03/17/2021	11:00 am	60	60	R	NEAH	EN, PN	GRPUB
FC	37 ELMHURST DR	6N006	03/17/2021	11:00 am	10	50	R	NEAH	EN, PN	GRPVT
AF	3807 FOX CROFT RD	1B012	03/17/2021	11:00 am	60	600	R		EN, PN	CR
AF	3807 FOX CROFT RD	2B068	03/17/2021	11:00 am	60	600	R	NEAH	EN, PN	GRPUB
FC	6100 MURRAY ST	80001	03/17/2021	11:00 am	20	400	R	NEAH	EN, PN	GRPVT
FC	7909 MCDANIEL DR	2Q020	03/17/2021	11:00 am	20	100	R	NEAH	EN, PN	GRPVT
FC	7909 MCDANIEL DR	2Q021	03/17/2021	11:00 am	30	300	R	NEAH	EN, PN	GRPVT
FC	9401 IN TERSTATE 30	2R.026	03/17/2021	11:00 am	20	200	R	NEAH	EN, PN	GRPUB
FC	BACK WATER FLOW VALVE	6N016	03/17/2021	11:00 am	20	100	R	NEAH	EN, PN	GRPVT
AF	Kanis Park	2H074	03/17/2021	11:00 am	60	600	R	NEAH	EN, PN	GRPUB
AF	Rebsamen Park	4B005	03/17/2021	11:00 am	60	1,200	R	NEAH	EN, PN	GRPUB
AF	Rebsamen Park	5C007	03/17/2021	11:00 am	60	600	R	NEAH	EN, PN	GRPUB
FC	7909 MCDANIEL DR	2Q021	03/23/2021	4:00 am	20	200	R	NEAH	EN, PN	GRPVT
FC	7711 DISTRIBUTION DR	2R026	03/25/2021	8:00 am	30	150	R	NEAH	EN, PN	GRPVT
FC	7909 MCDANIEL DR	2Q021	03/25/2021	8:00 am	30	300	R	NEAH	EN, PN	GRPVT

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# LITTLE ROCK WASTEWATER UTILITY CAPACITY SANITARY SEWER OVERFLOW REPORT 1/1/2021 - 12/31/2021

#### CODE DESCRIPTIONS

NPDE S PE RMIT 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 OBSERVED ENVIRONMENTAL IMPACT NEAH - No Evidence of Adverse Health or Environmental Impacts OEHC - Observed or Evidence of Human Contact EFK - Evidence of Fish Kill

R - Rainfall

#### ACTION(S) TAKE N

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

NPDE S PE RMIT	L OCAT ION	MANHOLE NO.	DATE OF SSO	TIME OF SSO	E ST IMATE D DURATION, MIN	E ST IMATE D VOL UME, GAL	CAUSE OF	OBSERVED ENVIRON. IMPACT	ACT I ON(S) TAKE N T O ADDRE SS SSO	ULTIMATE DISCHARGE LOCATION
FC	BACK WATER FLOW VALVE	6N016	03/25/2021	8:00 am	30	90	R	NEAH	EN, PN	GRPVT
AF	Hindman Park	20025	03/25/2021	8:00 am	30	300	R	NEAH	EN, PN	GRPVT
AF	Kanis Park	2H019	03/25/2021	8:00 am	10	20	R	NEAH	EN, PN	GRPUB
AF	Kanis Park	2H074	03/25/2021	8:00 am	10	10	R	NEAH	EN, PN	GRPUB
FC	6100 MURRAY ST	80001	04/24/2021	1:00 am	20	100	R	NEAH	EN, PN, WO	GRPVT
FC	7909 MCDANIEL DR	2Q020	04/24/2021	1:00 am	20	100	R	NEAH	EN, PN, WO	GRPVT
FC	7909 MCDANIEL DR	2Q021	04/24/2021	1:00 am	30	300	R	NEAH	EN, PN, WO	GRPVT
FC	9401 IN TERSTATE 30	2R026	04/24/2021	1:00 am	30	300	R	NEAH	EN, PN, WO	GRPUB
AF		2H074	05/18/2021	12:30 pm	120	120	R	NEAH	EN, PN	GRPUB
FC		2P025	05/18/2021	12:30 pm	30	300	R	NEAH	EN, PN	GRPUB
FC	7909 MCDANIEL DR	2Q021	05/18/2021	12:30 pm	30	600	R	NEAH	EN, PN	GRPUB
AF	Kanis Park	2H019	05/18/2021	12:30 pm	15	45	R	NEAH	EN, PN	GRPUB
AF	3807 FOX CROFT RD	1B012	06/08/2021	9:00 am	5	5	R	NEAH	EN, PN	GRPUB
AF	5512 TULLEY CV	-8-A015	06/08/2021	9:00 am	5	5	R	NEAH	EN, PN	GRPVT
FC	6100 MURRAY ST	80001	06/08/2021	9:00 am	60	300	R	NEAH	EN, PN	GRPVT
FC	7711 DISTRIBUTION DR	2R026	06/08/2021	9:00 am	50	250	R	NEAH	EN, PN	GRPVT
FC	7909 MCDANIEL DR	2Q020	06/08/2021	9:00 am	30	150	R	NEAH	EN, PN	GRPVT
FC	7909 MCDANIEL DR	2Q021	06/08/2021	9:00 am	45	450	R	NEAH	EN, PN	GRPVT
FC	BACK WATER FLOW VALVE	6N016	06/08/2021	9:00 am	30	90	R	NEAH	EN, PN	GRPVT
AF	OPEN CHANNEL FLOWMONITOR IN	16H003	06/08/2021	9:00 am	60	1,200	R	NEAH	EN, PN	GRPUB
FC	6100 MURRAY ST	80001	08/15/2021	1:30 am	20	100	R	NEAH	EN, PN	GRPUB
AF	322 S VALENTINE ST	8G020	10/02/2021	11:30 pm	60	60	R	NEAH	EN, PN, WO	GRPUB
FC	6100 MURRAY ST	80001	12/18/2021	4:30 am	5	5	R	NEAH	EN, PN	GRPUB
						VEPELOWS.	71			

COUNT of CAPACITY OVERFLOWS: 71

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# **ATTACHMENT O.** Cap the Cleanout

