



January 7, 2009

Ms. Cindy Garner  
Technical Assistance Manager  
NPDES Enforcement Section  
Arkansas Department of Environmental Quality  
P.O. Box 8913  
Little Rock, AR 72219-8913

Re: Compliance Report  
Little Rock Wastewater  
Little Rock, Arkansas  
Arkansas Department of Environmental Quality  
Consent Administrative Order LIS No. 06-037

Dear Ms. Garner:

In accordance with the cover letter attached to the above referenced Consent Administrative Order LIS No. 06-037 (CAO), Little Rock Wastewater is submitting this report concerning the program effectiveness and related goals established for dry weather, non-capacity related overflows.

As described in the Settlement Agreement between the Sierra Club and the City of Little Rock and the Little Rock Sanitary Sewer Committee, the compliance deadline for non-capacity related overflows was set at six (6) overflows per one hundred (100) miles of sanitary sewer lines owned and operated by Little Rock Wastewater (LRW). While interim deadlines were established, the ultimate compliance deadline for non-capacity related overflows was to be reached by the completion of the calendar year 2008.

As of January 1, 2009, LRW owned and operated 1,311 miles of sanitary sewer lines. By incorporating the compliance deadline of 6 overflows per one hundred miles, the compliance standard of 78 overflows for the calendar year of 2008 was established.

LRW Maintenance crews reported a total of forty three (43) non-capacity overflows from January 1, 2008 through December 31, 2008. Of those forty-three (43), five (5) SSOs were related to vandalism and five (5) SSOs were related to construction. The

Letter to Cindy Garner  
Re: Compliance Report  
January 7, 2009  
Page 2

result was a total of thirty-three (33) non-capacity related overflows attributed to the operation and maintenance of the LRW collection system.

The efforts of the LRW staff have resulted in reaching a number of non-capacity related overflows below the required 6 per 100 miles, as established by the Settlement Agreement, for the years 2004 through 2008. A more detailed description of the 2008 overflows and mitigation effort will be contained in the 2008 Annual CAO Report which will be submitted to you, on or before February 28, 2009.

Should you have any questions regarding this letter, please contact me at 501-688-1413 or e-mail at [howell.anderson@lrwu.com](mailto:howell.anderson@lrwu.com).

Sincerely,

**LITTLE ROCK WASTEWATER**



Howell Anderson, P.E.  
Manager of Engineering Services

HA:ced  
Enclosure

Cc: Reggie A. Corbitt, P.E., CEO  
Little Rock Sanitary Sewer Committee  
Little Rock Wastewater Directors  
*Arkansas Democrat-Gazette*