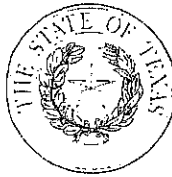


Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

July 2, 2013

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

The Honorable W. Richard Davis
Mayor of University Park
City of University Park
3800 University Boulevard
University Park, Texas 75205-1711

91 7199 9991 7032 7504 2583

Re: Sanitary Sewer Overflow ("SSO") Initiative
City of University Park, Dallas County
RN101451243; Enforcement Case No. 45107

Dear Mayor Davis:

Please find enclosed a revised proposed SSO Agreement based on discussions with Mr. Gene Smallwood regarding requested changes in the proposed SSO Agreement dated May 2, 2013. The language in paragraph 2 on page 1 has been changed from 100 miles to 63 miles, the number of reported discharges in paragraph 3 on page 1 has been changed to from 9 to 2, the total amount of the discharges has been changed from 221,170 gallons to 1,200 gallons, the typos in 1.b and 1.c on page 2 have been corrected, and Provision 11 on page 5 has been deleted. The remainder of the Agreement stays the same.

Please review the Agreement, affix your signature and the date, and return it to this office within 30 days after the date of this letter. A copy of the Agreement is provided for your files. Also, enclosed for your convenience is a return envelope.

Sincerely,

A handwritten signature in cursive script that reads "Susan Johnson".

Susan Johnson, Manager
Enforcement Division
Texas Commission on Environmental Quality

SJ/hw

Enclosures: Revised Agreement with Attachments, Return Envelope

cc: Manager, Water Section, Dallas/Fort Worth Regional Office, TCEQ
Mr. Bob Livingston, City Manager, City of University Park, 3800 University Boulevard, University Park, TX 75205

P.O. Box 13087 • Austin, Texas 78711-3087 • 512-239-1000 • tceq.texas.gov

How is our customer service? tceq.texas.gov/customersurvey

printed on recycled paper using vegetable-based ink

The Honorable W. Richard Davis

Page 2

bcc: Mr. Harvey Wilson, Coordinator, Enforcement Division, MC 169
Central Records, MC 213, Building E, 1st Floor, SSO/RN101451243/CO
Enforcement Division Reader File

Texas Commission on Environmental Quality

AGREEMENT

City of University Park
RN101451243
Enforcement Case No. 46107
Dallas County, Texas

The Texas Commission on Environmental Quality ("Commission" or "TCEQ") is the state agency charged with enforcing TEX. WATER CODE ch. 26 (the "Code") and the regulations promulgated pursuant to the Code.

The City of University Park ("University Park") owns and operates a wastewater collection system located in Dallas County, Texas (the "System"). The System consists of approximately 63 miles of cement and clay lines, from 6 inches to 30 inches in size, with a majority being eight inches or smaller and 1,181 manholes.

University Park has reported two unauthorized discharges totaling 1,200 gallons during the period between March 2007, and April 2012. The majority of the discharges were due to infiltration and inflow. University Park will be required to rehabilitate the System to insure a reduction of risk to the public health and the environment and to comply with Commission requirements.

PROVISIONS

In response to these deficiencies and in an effort to eliminate the potential threat to public health, University Park and the Commission have entered into an Agreement. This Agreement formalizes the commitments made by University Park in its letter to the TCEQ dated December 19, 2012 (see Attachment A). The provisions of this Agreement are as follows:

1. The Executive Director recognizes that University Park has:
 - a. Performed a Sanitary Sewer Evaluation Survey ("SSES");
 - b. Replaced one-third of the sewer mains which had deteriorated;

- c. Entered into an Interlocal Agreement to share maintenance and operation of the 30-inch Turtle Creek Interceptor;
 - d. Identified plumbing defects on private property and notified owners to make repairs;
 - e. Improved building standards so the plumbing in all new residences comply with the International Building Code;
 - f. Worked with the Town of Highland Park to reduce infiltration and inflow into its System since the two collection systems are connected;
 - g. Worked with the City of Dallas to provide additional flow capacity at the System's point of entry into the 30-inch Turtle Creek Interceptor where University Park's System connects to the Dallas collection system; and
 - h. Retained Freese and Nichols Consulting Engineers to study the System and develop recommendations for improvements needed to prevent future unauthorized discharges from the system.
2. By December 31, 2013, University Park shall:
- a. Replace 7,200 linear feet of sewer main;
 - b. Inspect and repair 300 manholes. All damaged lids shall be replaced, all manhole lids shall be raised above the water flow line of the surrounding area, rain guards will be installed, and voids around pipe penetrations will be filled; and
 - c. Smoke and dye test 25,000 linear feet of collection lines and notify property owners of any plumbing defects located on their property and require repairs be made.
3. By December 31, 2014, University Park shall:
- a. Design and replace approximately 3,500 of linear feet of sewer main which was indicated by smoke and dye testing as needing to be replaced;
 - b. Inspect and repair an additional 300 manholes. All damaged lids shall be replaced, all manhole lids shall be raised above the water flow line of the

surrounding area, rain guards will be installed, and voids around pipe penetrations will be filled;

- c. Smoke and dye test an additional 25,000 linear feet of collection lines and notify property owners of any plumbing defects located on their property and require repairs be made; and
- d. Repair or replace any sewer lines found in need of repair or replacement by the smoke and dye testing accomplished in 2013.

4. By December 31, 2015, University Park shall:

- a. Inspect and repair an additional 300 manholes. All damaged lids shall be replaced, all manhole lids shall be raised above the water flow line of the surrounding area, rain guards will be installed, and voids around pipe penetrations will be filled;
- b. Smoke and dye test an additional 25,000 linear feet of collection lines and notify property owners of any plumbing defects located on their property and require repairs be made; and
- c. Repair or replace any sewer lines found in need of repair or replacement by the smoke and dye testing accomplished in 2014.

5. By December 31, 2016, University Park shall:

- a. Inspect and repair an additional 300 manholes. All damaged lids shall be replaced, all manhole lids shall be raised above the water flow line of the surrounding area, rain guards will be installed, and voids around pipe penetrations will be filled;
- b. Smoke and dye test an additional 25,000 linear feet of collection lines and notify property owners of any plumbing defects located on their property and require repairs be made; and
- c. Repair or replace any sewer lines found in need of repair or replacement by the smoke and dye testing accomplished in 2015.

6. By December 31, 2017, University Park shall:

- a. Inspect and repair an additional 300 manholes. All damaged lids shall be

replaced, all manhole lids shall be raised above the water flow line of the surrounding area, rain guards will be installed, and voids around pipe penetrations will be filled;

- b. Smoke and dye test an additional 25,000 linear feet of collection lines and notify property owners of any plumbing defects located on their property and require repairs be made; and
 - c. Repair or replace any sewer lines found in need of repair or replacement by the smoke and dye testing accomplished in 2016;
7. University Park shall evaluate the effectiveness of its corrective actions by continually monitoring the flow in the System, comparing the volume before and after each wet event while this Agreement is in effect, and by monitoring the number of unauthorized discharges each year while this Agreement is in effect, and include this information in the annual report submitted to TCEQ.
8. On December 31, 2013, and on an annual basis thereafter, University Park shall submit a report to the Commission that contains information regarding the progress of the corrective actions contained in Provision Nos. 2 through 7. The reports shall include specific corrective actions that were completed during the reporting period, as well as any proposed corrective actions that were delayed or not completed, including explanations why the actions were delayed or not completed, in accordance with the attached TCEQ SSO Agreement Annual Progress Report (Attachment B).
9. By March 31, 2018, University Park shall submit a written Final Report that contains the following:
- a. A summary of all corrective actions that have been completed in accordance with the Provisions in this Agreement;
 - b. A summary of all Provisions in this Agreement that were not completed, including reasons why specific corrective actions were delayed or not completed; and
 - c. A description of the overall improvement the corrective actions had on the System.
10. The Executive Director may grant an extension or modification to any provision of this Agreement upon a written and substantiated showing of good cause. All

requests for extensions or modifications by University Park shall be made in writing to the TCEQ. Extensions or modifications are not effective until University Park receives written approval from the TCEQ. The determination of what constitutes good cause rests solely with the TCEQ.

11. University Park shall submit copies of all correspondence, reports, and documentation required by Provision Nos. 7 through 10 to:

Order Compliance Team
Enforcement Division, MC 149A
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, Texas 78711-3087

with a copy to:

Manager, Water Section
Dallas Regional Office
Texas Commission on Environmental Quality
2309 Gravel Drive
Fort Worth, TX 76118-6951

In return for University Park's agreement and adherence to these terms, the Commission will withhold further enforcement actions related to minor deficiencies. Should unforeseen circumstances indicate a need to alter the above mentioned schedule, University Park must immediately notify the Commission so that an amendment can be discussed.

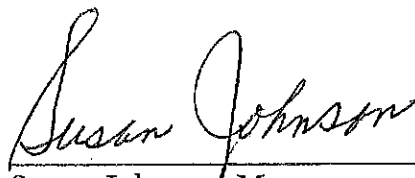
The effective date of this Agreement is the signature date of University Park's authorized representative. Acceptance of the terms of this Agreement is indicated by the signature below.

Authorized representative of
the City of University Park

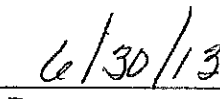
Date

Printed name of authorized representative
for the City of University Park

Title



Susan Johnson, Manager
Water, Enforcement Division



Date

Instructions: Send this signed, original Agreement to Harvey Wilson, Enforcement Division, MC 169, Texas Commission on Environmental Quality, P. O. Box 13087, Austin, Texas 78711-3087

;

ATTACHMENT A

Contents

Sanitary Sewer Overflow Outreach Initiative **Corrective Action Plan**



City of University Park
Committed to Excellence

December 19, 2012

Mr. Sid Slocum
Water Section Manager
DFW Region Office
2309 Gravel Drive
Fort Worth, Texas 76118-6951

Re: Sanitary Sewer Overflow Initiative Plan Submittal
City of University Park, (Dallas County), Texas
Regulated Entity No. RN 101451243

Dear Mr. Slocum:

Enclosed is the City's SSO plan submittal to reduce and to eliminate sanitary sewer overflows (SSOs). The City has had an ongoing program to reduce and eliminate SSOs since 1988 and through this Initiative will continue to work towards elimination of SSOs.

The City's participation in the SSO Initiative does not admit any guilt related to the alleged failure to prevent unauthorized discharge of wastewater from the collection system. The City thus reserves the right in any enforcement action to provide a defense against any alleged violation. Based on its review of all State requirements, the City Council approved on December 18, 2012 the attached Initiative Plan for implementation over the next ten years.

The City appreciates the opportunity to participate in the TCEQ's Sanitary Sewer Overflow Initiative and looks forward to an agreement to formalize these commitments.

Please let me know if you have any questions or need additional information.

Sincerely,

Gene R. "Bud" Smallwood, P.E.
Director of Public Works

Enclosure: City's SSO Initiative Plan Submittal

RECEIVED
DEC 21 2012
DFW REGION-4

Texas Commission on Environmental Quality Sanitary Sewer Overflow Initiative Plan

For the City of University Park
Customer Number CN600292122
Regulated Entity Number RN101451243
3800 University Boulevard Drive
University Park, Texas 75205

The City of University Park (the "City") has had an ongoing aggressive program to reduce infiltration/inflow and eliminate overflowing manholes in the City since 1989. The City (A) performed a Sanitary Sewer Evaluation Survey in 1997 and began implementing a program to replace mains, identify and correct private plumbing defects, improve building standards to avoid cross connections. A second SSES was developed in 2007-08 with the same corrective actions taken, (B) worked with The Town of Highland Park (the "Town") to reduce I & I in its system, and (C) worked with the City of Dallas to provide additional capacity at the point of entry. Since 1989, the City has had a capital program to replace deteriorated mains and has replaced approximately one-third of its wastewater collection system, (B) entered into an Interlocal Agreement with the Town to share in the maintenance and operation of the thirty-inch Turtle Creek Interceptor, and (C) had a commitment from the City of Dallas to provide additional capacity by 2015. The City is currently in design of a project (construction in 2013) that will eliminate the single point where two SSO's have occurred, and has been working with Highland Park to significantly reduce the number, frequency, and volume of SSOs in the Town. However, overflows continue to occur on the shared interceptor in the Town during extreme heavy rain events. The City has committed to the EPA and the TCEQ to continue our aggressive ongoing program to eliminate SSOs. The purpose of this SSO Initiative submittal is to renew its commitment in reducing and eliminating SSOs throughout the Town.

Proposed Sanitary Sewer Overflow Plan

Description of Causes of the SSOs

The primary locations of overflows are located in the Town of Highland Park at the intersection of Armstrong Avenue and Lakeside Drive on the thirty-inch Turtle Creek Interceptor (UP-HP shared main). The cause of these SSOs and others upstream of this location is excessive inflow and infiltration from the Town, City, and the City of Dallas. The quantity of flow from these cities during severe rain events exceeds the capacity of the main. Capacity at the point of entry south of Wycliffe Avenue is restricted causing flows in the interceptor to backup and overflow.

Interim Measures to Reduce the Effects of Continuing SSOs

1. Continue smoke and dye testing a sub-basin area of the City. Dividing the City into five (5) sub-basins will enable the City to complete inspection and evaluation of the entire wastewater collection system every ten years. This program has started, and the staff is evaluating the data for establishing priorities and method of corrections.
2. Clean, inspect, repair, rehabilitate, and replace mains in the portion of the wastewater collection system within the study area.

RECEIVED

DEC 21 2012

DFW REGION-4

3. Contact property owners to correct deficiencies with their sanitary sewer service lines deficiencies, as identified by a second SSES performed in 2008. One of the main deficiencies was missing cleanout caps. The City is initiating a program to confirm the locations and ask our Code Enforcement staff to contact the residents with a notice to correct the problem.
4. Continue working with City of Dallas to facilitate construction of a wastewater main at the Town and City limit line adequate to receive the Town of Highland Park's and the City of University Park's wastewater flows.
5. Continue working with the Town of Highland Park in programs and projects to reduce I/I from entering their collection system so that the I/I is not transported through the shared 30" interceptor to the City of Dallas.
6. In the 2011-2012 budget, the City replaced approximately 7,200 linear feet of deficient and deteriorated sanitary sewer mains at a cost of approximately \$1,872,150.

A Timeline of Action Items and Milestones

2012-2013

- Hire consultant firm to study hydraulics of the wastewater collection system. Freese and Nichols consulting engineers (F&N) has been retained for this assignment. The Town of Highland Park and City of University Park will share the costs for this work. The study will include recommendations and cost estimates to reduce SSOs.
- Continue design and replacement of sewer mains, clean outs, and manholes for approximately 3,500 linear feet.
- Continue working with private property owners to complete repair and replacement of illicit connections. Initiate notice to property owners of missing cleanout caps.
- Continue working on a GIS-based data management system to capture, store and update SSO related information. Utilizing this data to prioritize on areas where majority of SSOs are concentrated.

2013-2014

- Evaluate and prioritize projects as recommended by F&N consultant to reduce SSOs.
- Continue working on a GIS-based data management system to capture, store and update SSO related information. Utilizing this data to prioritize on areas where majority of SSOs are concentrated.
- Replacement of several aged sanitary sewer mains located in easements, streets, and alleys.
- Reevaluate the properties identified as having illicit connections to assure all vulnerable areas been repaired, replaced, or corrected.
- Continue working with City of Dallas and Town of Highland Park toward developing plans or projects that will eliminate SSOs.

2014-2015

- Continue on improvements as recommended by F&N.
- Update SSO related information on GIS.
- Evaluate effectiveness of improvements.
- Replace sanitary sewer mains in easements, streets, and alleys.
- Clean, televise, smoke and dye test another sub-basin area of the wastewater collection system. Evaluate collected data and begin necessary repairs and replacements.
- Begin contacting those private property owners with defective system to make corrective repairs, specifically missing cleanout caps.
- Continue working with City of Dallas and Town of Highland Park to coordinate programs and projects focused on eliminating SSOs.
- City of Dallas is schedule to complete construction of relief main to provide additional capacity.

2015-2016

- Continue on improvements as recommended by F&N.
- Evaluate effectiveness of improvements.
- Reevaluate and prioritize projects for design and construction based on severity of their vulnerability and effectiveness of the improvements in reducing I/I.
- Replacement of several aged sanitary sewer mains located in easements and alleys.
- Continue working with private property owners to complete repair and replacement of their illicit connections.
- Continue working with City of Dallas and Town of Highland Park to coordinate programs and projects focused on eliminating SSOs.
- Review and refine the City's sanitary sewer response procedures including containment clean up and inspection.

2016-2017

- Continue on improvements as recommended by F&N.
- Reevaluate and prioritize projects for design and construction based on severity of their vulnerability and effectiveness of the improvements in reducing I/I.
- Replace deficient sewer mains.
- Clean up, televising, smoke and dye testing another sub-basin of the wastewater collection system. Evaluate collected data and begin necessary repairs, replacements.
- Contacting those private property owners with defective system.
- Update SSO related information on GIS.
- Continue working with City of Dallas and Town of Highland Park to coordinate programs and projects focused on eliminating SSOs.

2017-2018

- Continue design and replacement of deficient sewer mains.

- Continue working with private property owners to complete repair and replacement of their illicit connections.
- Re-evaluate and re-assess projects based on the I/I condition, age and rate of deterioration to effectively eliminate SSOs.

2018-2019

- Continue design and replacement of deficient sewer mains.
- Continue working with private property owners to complete repair and replacement of their illicit connections.
- Clean, televise, smoke and dye test another sub-basin area of the wastewater collection system. Evaluate collected data and begin necessary repairs and replacements.
- Re-evaluate and re-assess projects based on the I/I condition, age and rate of deterioration to effectively eliminate SSOs.

2019-2020

- Continue design and replacement of deficient sewer mains.
- Continue working with private property owners to complete repair and replacement of their illicit connections.
- Re-evaluate and re-assess projects based on the I/I condition, age and rate of deterioration to effectively eliminate SSOs.

2020-2021

- Continue design and replacement of deficient sewer mains.
- Continue working with private property owners to complete repair and replacement of their illicit connections.
- Clean, televise, smoke and dye test another sub-basin area of the wastewater collection system. Evaluate collected data and begin necessary repairs and replacements.
- Monitor and evaluate effectiveness of improvements.
- Re-evaluate and re-assess projects based on the I/I condition, age and rate of deterioration to effectively eliminate SSOs.

2021-2022

- Continue design and replacement of deficient sewer mains.
- Continue working with private property owners to complete repair and replacement of their illicit connections.
- Re-evaluate and re-assess projects based on the I/I condition, age and rate of deterioration to effectively eliminate SSOs.

Description of Measurable Corrective Measures to be Taken to Reduce SSOs

Budget and spend an estimated \$1,000,000 annually for repair, replacement, and rehabilitation of sanitary sewer mains.

The 2012-2013 plan includes:

Sanitary Sewer Main Replacement Program

- (1) Replacement of 2,531 linear feet of sanitary sewer main along St Andrews (Normandy to Preston Road) and along the San Carlos - Potomac alley from Preston Road to Armstrong, and along the Potomac - Mockingbird alley east from Armstrong to the corporate limit. Estimated construction cost is \$1,660,000
- (2) Study by Freese and Nichols Consulting Engineers to model the Turtle Creek Interceptor thru Highland Park and University Park. Study will identify alternatives to eliminate SSOs and cost estimates. The City's share of the cost is \$32,500.00.
- (3) Design of about 5,200 linear feet of sanitary sewer along Douglas, north from the Emerson-Glenwick alley to Colgate. Additionally, about 1,100 linear feet of sewer along the Southwestern-Greenbrier alley, west from Douglas to Lomo Alto. The estimated cost is \$2,500,000.

Prepare an annual report to the TCEQ detailing the progress of the above-referenced program of the past year and outline the plan and objectives of the next year plan.

Development, Implementation, and Updates to the Operations and Maintenance Program to Ensure Compliance

The City is 90% residential and 10% commercial and retail. The City has no industry, however the SMU campus is located within the City's corporate limits. The wastewater collection system has 75 miles of gravity sanitary sewer mains. Old sewers, mostly 4" to 12" clay tile with some concrete, are being replaced with PVC, minimum 8" diameter. The resident is responsible for installation and maintenance of service lines from the house to the main.

The Infrastructure Maintenance staff and the Engineering staff work closely together to assess the condition of the sanitary sewer collection system and prioritize projects for repair and replacement. Potential sources of I & I are jointly investigated and solutions discussed. The Infrastructure Maintenance Division currently cleans the collection system two to three times a year. Infrastructure Maintenance inspects manholes and mainline cleanouts to ensure all openings are sealed and protected from inflows entering the collection system from these appurtenances on annual basis.

The Engineering Division provides engineering services for the City. Data is gathered, evaluated, and prioritized. Eliminating SSOs has and continues to be a high priority of the Engineering Division.

Personnel from the Community Development Department coordinate with residents to eliminate service line deficiencies.

The City covers an area of 3.73 square miles and has approximately 8,600 residential properties. Each year many of these residences are demolished to construct a new residence. 291 new residences were constructed in the past 5 years. Sanitary sewer service lines are required to be replaced for all new residences.

Description of Funding Source(s), Including Budget Allocations

The funding for the sanitary sewer program is from City's Capital Projects Funds and the general operating fund budget for the Infrastructure Maintenance and Engineering Departments. The source of these funds is from the sales of water and wastewater services and property taxes. The City has funded these programs via the Capital Projects Program since 1993.

Description of the Means for Evaluating the Effectiveness of Improvements

The City will provide an annual report summarizing progress achieved for the reporting period and the next year's work plan. The report will include the number of SSOs that occurred that year compared to previous years, a summary of metered flows, trends observed, and other highlights of significant events.

Comprehensive Evaluation of the Wastewater Collection System

In 1996, the City hired a consultant to perform a Sanitary Sewer Evaluation Survey of the City's collection system. Selected areas have been restudied in 2004, 2006, and 2009. The conclusion of these studies (A) found the 80 to 90 year old collection system to be deteriorated and in need of replacement, (B) identified cross connections of storm drains to the collection system, and (C) discovered private plumbing problems.

Based on these studies the City has replaced over one-third of the collection system, made hundreds of repairs, and furthermore, the City's residents have corrected hundreds of private plumbing problems contribution inflows to the collection system.

Reports and Updates as Required by the TCEQ

The City will report annually to the TCEQ for the period of October 1 thru September 30 of each year of the Initiative by December 31. The report will include a summary of actions taken, the cost associated with those actions, and the plan for the next year.

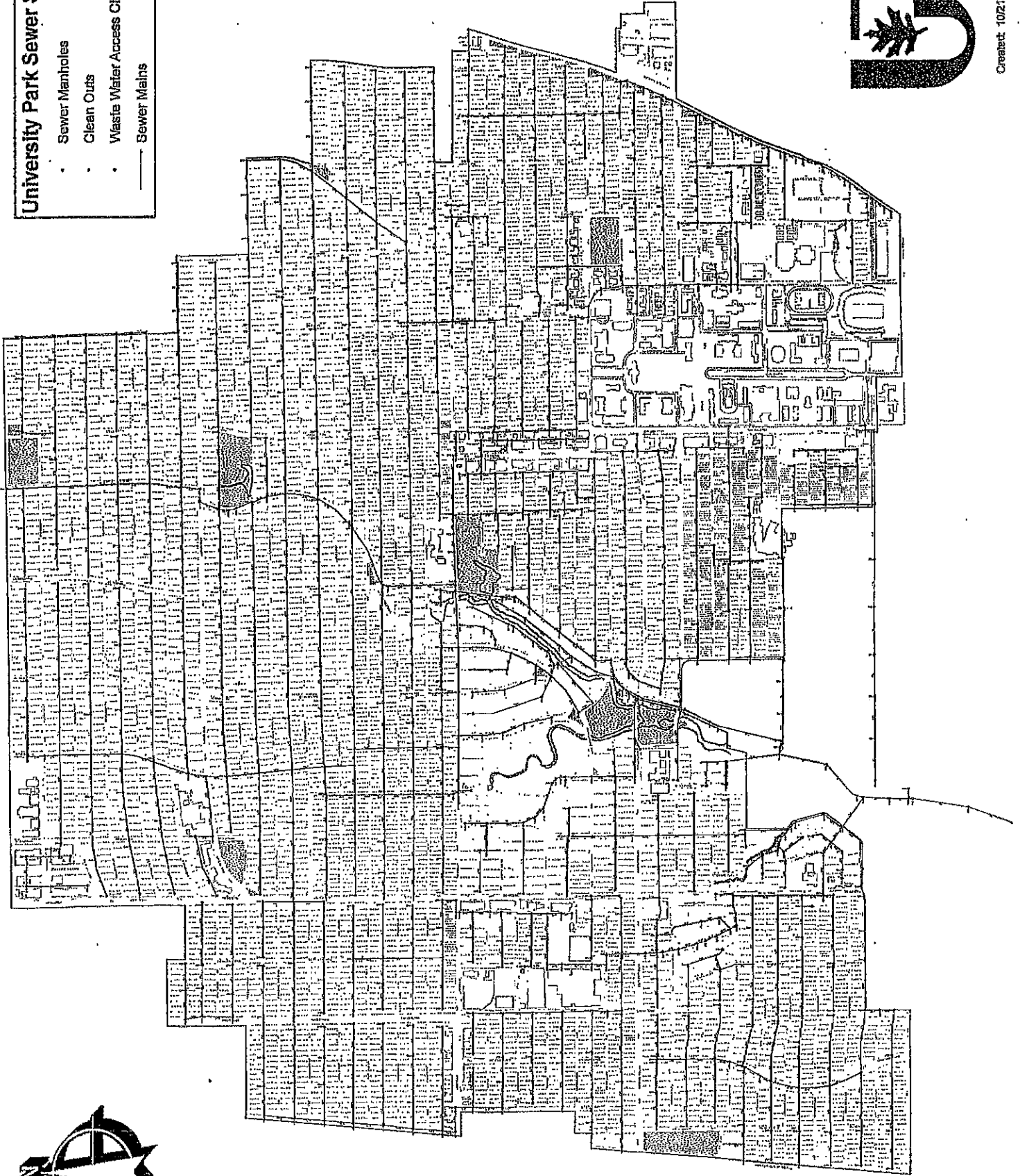
The contact for the City of University Park is Gene Smallwood, P.E., Director of Public Works. His phone number is 214 987-5400 and his e-mail address is bsmallwood@uptexas.org.

Attachments: Map of City's Wastewater Collection System.



University Park Sewer System

- Sewer Manholes
- Clean Outs
- Waste Water Access Chamber
- Sewer Mains



Created: 10/21/2010

Bryan W. Shaw, Ph.D., *Chairman*
Carlos Rubinstein, *Commissioner*
Toby Baker, *Commissioner*
Zak Covar, *Executive Director*



TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

January 16, 2013

CERTIFIED MAIL 91 3408 2133 3931 4067 3992
RETURN RECEIPT REQUESTED

Mr. Gene Smallwood, P.E., Director of Public Works
City of University Park
3800 University Boulevard
University Park, Texas 75205-1711

Re: **Notice of SSO Plan Acceptance**
Sanitary Sewer Overflow (SSO) Initiative
City of University Park, (Dallas County), Texas
Regulated Entity No.; RN101451243

Dear Mr. Smallwood:

The Texas Commission on Environmental Quality's (TCEQ) Dallas/Fort Worth Region Office has completed the review of your Sanitary Sewer Overflow (SSO) Plan dated December 19, 2012. The plan appears to address the SSOs in your collection system. Based upon our review, your plan is approved and will be forwarded to the Enforcement Division for incorporation into an Agreement. Please note that upon receipt, the Enforcement Division will also review the plan and may request additional information if necessary to formalize your SSO Plan into the Agreement. **In addition, you should be aware that participation in the TCEQ's SSO Initiative does not preclude federal enforcement action taken by the Environmental Protection Agency.**

If you or members of your staff have any questions, please feel free to contact me at the Dallas/Fort Worth Region Office at 817-588-5800.

Sincerely,

A handwritten signature in black ink, appearing to read "Sid Slocum".

Sid Slocum
Water Section Manager
Dallas/Fort Worth Region Office

SS/gd

ATTACHMENT B

CONTENTS

Annual Progress Report

Texas Commission on Environmental Quality Sanitary Sewer Overflow (SSO) Agreement Annual Progress Report

INSTRUCTIONS

- This form is optional; however, it identifies the required and optional information to be included in the annual progress report for participants in the SSO Initiative. **Participants are highly encouraged to use the form.**
- You may attach to this form any additional information that demonstrates the progress made during the reporting period (such as graphs, photos, work order receipts, etc.)
- The **annual reporting period is located in your Agreement.** Typically, an initial progress report is due 90 days after the effective date of the Agreement, with progress reports due annually thereafter.
- This form may also serve as a template for developing your SSO plan.
- For each section that is completed, please reference the corresponding provision number from the Agreement.
- Participants are required to report the items marked with an asterisk (*) including all items in Section 1 through Section 4.

SECTION 1. PARTICIPANT INFORMATION

1.1	Participant Name*	
1.2	Case Number (located on the Agreement)*	
1.3	Regulated Entity Number*	
1.4	State Water Quality Permit Number (if applicable)*	
1.5	Representative Name & Title*	
1.6	Representative Phone Number*	
1.7	Annual Reporting Period (see instructions)*	

SECTION 2. EVALUATING THE EFFECTIVENESS OF THE PLAN

2.1	Provide the total number of SSOs (including the date, volume, and cause for each SSO) that occurred during the reporting period.*	
------------	--	--

2.2	Provide a brief summary of how the corrective actions that were completed during this reporting period have already contributed to a reduction of SSOs in the system.*	
2.3	What actions are currently being taken or planned to ensure a reduction of SSOs will occur in the future?*	
2.4	Provide any additional information that demonstrates the success of your program (e.g. Compare the number of wet weather overflows with dry weather overflows to show inflow/infiltration (I/I) reduction).*	

SECTION 3. INTERIM MEASURES TO MITGATE SSOs

3.1	Describe your SSO response plan.*	
3.2	What actions were taken during this reporting period to mitigate SSOs?*	
3.3	What improvements were made to your SSO response plan?*	

SECTION 4. SOURCES OF FUNDING

4.1	Provide a summary of the costs expended for completed projects during this reporting period.*	
4.2	Describe the anticipated and confirmed sources of funding for the next two years.*	

SECTION 5. OPERATIONS AND MAINTENANCE (O&M) PROGRAM

5.1	Briefly describe your O&M Program for the reporting period.*	
5.2	O&M Activities	Quantify the following components of your O&M activities for the reporting period. If you did not conduct an activity, please indicate with N/A.
5.2.1	Inspection frequency of the system (sewer pipes, lift stations, manholes, etc.)*	

5.2.2	Cleaning frequency of the system (sewer pipes, lift stations, manholes, etc.)*	
5.2.3	Total number of linear feet of sewer pipe in the system*	
5.2.4	Total number of linear feet of sewer pipe inspected*	
5.5.5	Total number of manholes in the system*	
5.2.6	Total number of manholes inspected*	
5.2.7	Total number of lift stations in the system*	
5.2.8	Total number of lift stations inspected*	
5.2.9	Total number of linear feet of sewer pipe cleaned*	
5.2.10	Describe the types of SSO-related employee training that was completed (e.g., Capacity, Management, Operations, & Maintenance; Fats, Oils, & Grease; etc.)*	
5.2.11	Other	

SECTION 6. SYSTEM EVALUATION & REHABILITATION

6.1	System Evaluation	Quantify or describe the following measures used to evaluate your system's capacity; inflow/infiltration (I/I) rate; etc. that were completed during the reporting period. If you did not conduct an activity, please indicate with N/A.
6.1.1	Flow Monitoring (e.g., wastewater treatment facility; lift stations; rainfall records, etc.)	
6.1.2	Dye Testing (e.g., to identify leaks, illegal connections, etc.)	
6.1.3	Smoke Testing (e.g., to identify illegal connections, exposed cleanouts, etc.)	
6.1.4	Evaluation to identify the location and condition of sewer pipes.	
6.1.5	Evaluation to identify the location and condition of manholes.	

6.1.6	Evaluation to identify the location and condition of lift stations.	
6.1.7	Closed Circuit Television	
6.1.8	System Mapping Updates	
6.1.9	Other	
6.2	Rehabilitation Projects	Quantify or describe the following rehabilitation projects that were completed during the reporting period. Please provide specific details, such as the number of linear feet, sizes of sewer pipes, number of manholes, etc. If you did not conduct an activity, please indicate with N/A.
6.2.1	Sewer Pipes Repaired/Rehabilitated*	
6.2.2	Sewer Pipes Replaced*	
6.2.3	Sewer Pipes Removed	
6.2.4	Sewer Pipes Added	
6.2.5	General Sewer Pipe Improvements	
6.2.6	Manholes Repaired/Rehabilitated*	
6.2.7	Manholes Replaced*	
6.2.8	Manholes Removed	
6.2.9	Manholes Added	
6.2.10	General Manhole Improvements (e.g., installing locks, replacing covers, etc.)	
6.2.11	Lift Stations Repaired/Rehabilitated*	
6.2.12	Lift Stations Replaced*	
6.2.13	Lift Stations Removed	
6.2.14	Lift Stations Added	
6.2.15	General Lift Station Improvements (e.g., electrical upgrades, installation of monitoring systems, etc.)	
6.2.16	Other	

SECTION 7. PUBLIC EDUCATION PROGRAMS

7.1	General SSO Education & Outreach	Quantify or describe the following measures completed under your SSO Education Program (if applicable) during the reporting period. Please provide specific details, such as number/frequency of brochures distributed, etc.
7.1.1	Educational Brochures (e.g., bill inserts, door knockers, etc.)	
7.1.2	Media Advertisements (e.g., television, radio, newspaper, etc.)	
7.1.3	Website Updates	
7.1.4	Educational/Training Opportunities (e.g., community events, school programs, etc.)	
7.1.5	City Ordinances	
7.1.6	Other	
7.2	Fats, Roots, Oil, & Grease (FROG) Program	Quantify or describe the following measures completed under your FROG Program (if applicable) during the reporting period. Please provide specific details, such as number/frequency of brochures distributed, etc.
7.2.1	Grease Trap/Interceptor Inspections*	
7.2.2	Grease Ordinance Updates	
7.2.3	Grease Ordinance Enforcement	
7.2.4	Grease Control Methods	
7.2.5	Food Service Establishment Training	
7.2.6	Root Control Methods	

SECTION 8. ADHERENCE TO MILESTONES

8.1	Discuss/describe all of the milestones that were completed in accordance with the requirements of the Agreement during the reporting period.*	
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8.2	Discuss/describe all of the milestones that were NOT completed in accordance with the requirements of the Agreement during this reporting period. Include any changes you plan to make to ensure that milestones are completed for the next two years.*	
8.3	Provide a list of scheduled projects that are planned for the next two years.*	

SECTION 9. MISCELLANEOUS

Provide any additional information you feel necessary to demonstrate compliance under the terms of the SSO Initiative.	
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SECTION 10. SIGNATURE

Signature

Date

Name (printed or typed)

Title