

Office of the City Attorney



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July 31, 2015

Chief, Environmental Enforcement Section
Environment and National Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-1-1-09841

Brad Ammons
Environmental Engineer
Clean Water Enforcement Branch
Municipal & Industrial Enforcement Section
U.S. EPA Region 4
61 Forsyth St., SW
Atlanta, GA 30303

Karl Fingerhood
Environmental Enforcement Section
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611


RE: City of Jackson, Mississippi, EPA Consent Decree
9th Quarterly Report, April 2015 through June 2015
5th Semi Annual SIPP Report, January 2015 through June 2015

Dear Gentlemen:

Attached please find Quarterly Report No. 9 for the period of April 2015 through June 2015 and Supplemental Environmental Project Semi Annual Report #5. The reports were developed and submitted by the City in accordance with the EPA Consent Decree dated March 1, 2013 and your correspondence of May 31, 2013.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Tony T. Yarber
Mayor

cc: Les Herrington, P.E., Mississippi Department of Environmental Quality
Gus McCoy, Chief Administrative Officer
Monica Joiner, City Attorney
Kishia L. Powell, P.E., Director, Department of Public Works
Mary D. Carter, Deputy Director of Public Works
Terry Williamson, Consent Decree Manager
Public Depository, Eudora Welty Public Library

Supplemental Environmental Project

Semi Annual Report #5

January 2015 through June 2015

The purpose of the Supplemental Environmental Project ("SEP") is to reduce extraneous flows entering the Wastewater Collection and Transmission System (WCTS) through defective residential Private Laterals and through illicit connections from residential properties of eligible property owners. For purposes of this SEP, an illicit connection is any residential connection to the WCTS that discharges any substance or solution that is not intended to be transferred via the WCTS, such as stormwater, surface water runoff and roof runoff. The WCTS becomes a conduit for stormwater when defective Private Laterals or illicit connections allow rain or groundwater to enter the WCTS. Certain components of the WCTS Evaluation Plan required by Section VIII of the Consent Decree will assist the City in identifying defective Private Laterals in need of repair or replacement and illicit connections to the WCTS.

Significant milestones reached this period for this activity:

- **Completed development of scopes of work, fee schedule, forms, and contracts to be used in implementation of the SEP**
- **Received proposal for private service lateral replacement from plumber. The initial effort to obtain qualifications from plumbers yielded only one submittal, though the pre-proposal meeting was attended by five plumbers. Currently, the City will use this one qualified plumber for the limited number of qualified homeowners solicited to date (see next bullet).**
- **Continued public notification of Private Service Lateral Program. Problems enlisting qualified homeowners in the project has impeded rehabilitation and replacement of private service laterals. Initial efforts were focused on a particular area in the Lynch Creek basin that appeared to have a high number of defective service laterals based on the last smoke testing performed in the area approximately 15 years ago. Even with the certainty of defective service laterals, the City was able to identify only ten qualified homeowners willing to participate. The City will move forward with repairs to these ten defective service laterals.**
- **Continued determinations of eligible property owners**

Significant milestones anticipated to be completed during the next reporting period:

- **Increase public notification efforts of program due to lack of participation from homeowners. The City is currently reviewing its service calls to identify potential qualified homeowners based**

on repeated service calls attributed to private service lateral defects. The City is also planning a press release by the Mayor in conjunction with a scheduled sign up for the program. This approached worked successfully several years ago for an energy efficient appliance replacement program funded through the ARRA.

- **In conjunction with increased recruiting efforts for qualified homeowners, the City will also again advertise for Statements of Qualification for plumbers, in an effort to recruit additional plumbers to perform the work**
- **Begin construction of private service lateral replacement**
- **Make third installment payment to SEP Escrow fund**

A Gantt chart indicating the overall progress of Consent Decree required activities and major milestones is shown on the following page

