

CITY WATER & LIGHT

JONESBORO, ARKANSAS



2024 PROGRESS REPORT

CORRECTIVE ACTION PLAN

**SANITARY SEWER OVERFLOWS: SUMMARY OF ONGOING ACTIONS
AND PLAN FOR ADDITIONAL CORRECTIVE MEASURES**

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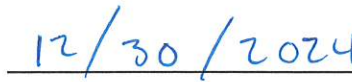
December 30, 2024

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Jake Rice III, Manager
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Jonesboro, AR



Date

Table of Contents

1. Executive Summary	7
2. Corrective Action Plan Activities – 2024.....	9
3. Phase II Corrective Action Plan Activities – Status	9
4. Phase II Capital Improvements	9
4.1. Westside WWTP Replacement	10
4.1.1. 24” Force Main.....	11
4.1.2. Biosolids Land Application System	12
4.1.3. ARPA Grant	12
4.2. Kitchen Interceptor – Phase I.....	12
4.3. Sports Complex Lift Station & Force Main Upgrades.....	12
5. Phase II SSES Status	13
5.1. Phase II SSES Activities - Status & Results.....	13
5.2. 2023 SSES Status – Final.....	14
6. Phase II SSES Resultant Repairs	15
6.1. Manhole SSES Resultant Repairs	16
6.2. Brick Manhole Cementitious Lining Rehabilitation.....	16
6.3. Manhole Heavy Ring & Lid Replacements	17
6.4. Main Line SSES Resultant Repairs	17
7. Phase I SSES Resultant Repairs – Phase II Milestone.....	18
8. Phase I Corrective Action Plan Activities – Status	19
9. Phase I Capital Improvements Status	19
10. Finalized Phase I SSES Activities – Summary	19
11. 2020 & 2022 Public Utility System Revenue Bonds – Wastewater	20
12. CMOM Software – GIS & CMMS Status.....	20
13. Collection System Maintenance	21
13.1. CCTV Training & Software/Hardware	22
13.2. Sewer Mains Cleaned.....	22
13.3. SL-Rat® Activities.....	22
13.4. Grease Treated Line Segments	23
13.5. Root Control Activities	23
13.6. Sewer Main CIPP Lining/Pipe Bursting.....	24

13.7.	Pipe Seals Chemical Grouting	24
13.8.	Aggie Rd Sewer Upgrade.....	24
13.9.	Dead End Sewer Mains Manhole Installations	25
14.	Sewer Lateral Repair Program Status	25
15.	FOG Management Program Status.....	26
16.	Lift Station Maintenance and Improvements.....	27
16.1.	Dorton Road Lift Station Improvements.....	28
16.2.	Wimpy Lift Station Basin Evaluation & Force Main Upgrades	28
17.	ARDOT Sewer Improvements	28
18.	Sewer Hydraulic Model.....	29
19.	Nestlé Pretreatment Facility Improvements	29
20.	Conclusion.....	29

References

Appendices

Appendix A – Phase II Capital Improvements

Appendix B - Basin Delineation

Appendix C – Basin SSES Status

Appendix D – Phase I Capital Improvements

Appendix E – FOG Postcard

Appendix F –Dorton Road Lift Station Improvements

Appendix G – Wimpy Lift Station Basin Evaluation & Force Main Upgrade

List of Tables

Table 4-1: Phase II Capital Improvements (As of November 1, 2024)

Table 4-2: Westside WWTP Contract Section Statuses (As of November 2024)

Table 5-1: 2024 SSES Activities (As of November 1, 2024)

Table 5-2: 2023 SSES Activities – Evaluation Final Results (Repairs as of November 1, 2024)

Table 9-1: Phase I Capital Improvements (As of November 1, 2024)

Table 10-1: Finalized Phase I SSES Activities – Summary

Table 13-1: 2024 Routine Collection System Maintenance (November 1, 2023 thru
October 31, 2024)

Table 13-2: SL-Rat® Sewer Line Assessment Results (November 1, 2023 thru October 31, 2024)

Table 14-1: Total Lateral Defects Identified & Current Repair Status (As of November 1, 2024)

Table 15-1: FOG Management Program Activity

List of Figures

Figure 4-1: New Westside WWTP (October 2024)

List of Graphs

Graph 6-1: Phase II SSES Resultant Repairs Status (As of November 1, 2024)

Graph 6-2: Phase I & II Brick Manhole Cementitious Lining (As of November 1, 2024)

Graph 7-1: Phase I SSES Resultant Repairs Status (As of November 1, 2024)

Graph 13-1: Sewer Mains Cleaned (2020 thru October 31, 2024)

Acronyms

ARPA – American Rescue Plan Act

ARDOT - Arkansas Department of Transportation

BOD – Biochemical Oxygen Demand

CAP – Corrective Action Plan

CCTV – Closed Circuit Television Video

CIPP – Cured-In-Place Pipe

CMAR – Construction Manager at Risk

CMMS – Computerized Maintenance Management System

CMOM - Capacity, Management, Operations, and Maintenance Program

Crist - Crist Engineers, Inc.

CWL - City Water and Light Plant of the City of Jonesboro, Arkansas

DEQ - Arkansas Department of Energy and Environment's Division of Environmental Quality

Duke's - Duke's Root Control, Inc.

ESRI – Environmental Systems Research Institute, Inc.

FOG - Fats, Oils and Grease

FSE – Food Service Establishment

GIS – Geographic Information System

I&I – Inflow and Infiltration

lbs/day – pounds per day

MGD – Million Gallons per Day

MW&Y - McGoodwin, Williams & Yates, Inc.

NASSCO - National Association of Sewer Service Companies

NPDES - National Pollutant Discharge Elimination System

Olsson – Olsson, Inc.

PVC – Polyvinyl Chloride

RFP – Request for Proposal

RJN - RJN Group, Inc.

SL-Rat® - Sewer Line Rapid Assessment Tool by InfoSense, Inc.

SSES – Sanitary Sewer Evaluation Study

SSO – Sanitary Sewer Overflow

Van Horn – Van Horn Construction, Inc.

VFD – Variable Frequency Drive

WWTP – Wastewater Treatment Plant

1. Executive Summary

CWL has maintained a longstanding effort in the effective and continuous management, operation, and maintenance of the collection system capacity and performance. This ongoing effort continued in 2024 through the corrective action activities that CWL committed to in both the CWL CAP submitted to the DEQ on March 28, 2016, and Addendum to CWL CAP submitted to the DEQ on April 14, 2016.

CWL is pleased to report on the completion of the Westside WWTP replacement. Formally presented as a Phase II Capital Improvement in 2020, the **\$73 million** new Westside WWTP includes **advanced nutrient removal** and was fully operational on August 7, 2024. With this milestone fully realized, CWL considers overall mitigation improvements ahead of schedule.

As of November 1, 2024, the corrective actions outlined in CWL's CAP and follow-up Addendum have been accomplished or are on schedule to be achieved by the respective initial or updated target completion date. For 2024, these activities included:

- i. Progress on Phase II Capital Improvements
- ii. Performed SSES of Approximately 32 Miles of the Collection System
- iii. Performed Resultant Repairs for Phase I & II SSES Basins
- iv. Completed the Westside WWTP Replacement, Phase II Capital Improvement
- v. Progress on CMOM Software Solutions
- vi. Progress on Sewer Lateral Repair Program
- vii. Continued FOG Management Program Outreach

In addition to the corrective actions performed this year, CWL continued ongoing comprehensive SSO mitigation efforts through the routine inspection and maintenance programs for the collection system and lift stations and the CMOM programs and processes currently in place and active. In continued efforts to enhance maintenance activities and build on past successes, CWL contracted the cementitious lining of brick manholes and the CIPP lining/pipe bursting of sewer mains. The contracts resulted from both maintenance and SSES activities. In addition, a contract was completed for the chemical grouting of pipe seals in a previously studied basin.

CWL, for many years, has demonstrated a culture of compliance and a commitment to SSO mitigation and as outlined in this progress report, 2024 was no exception. For the period of November 1, 2023 thru October 31, 2024, CWL has documented CMOM expenses totaling over **\$3.3 million** and capital costs totaling over **\$19.9 million**.

As reported in 2023, Phase I capital improvement projects are complete, with CWL investing over **\$32 million** in these improvements. In addition, CWL has invested over **\$71.6 million** toward the Phase II capital improvement projects and estimates additional capital expenditures of approximately **\$3 million** to complete these Phase II efforts.

As previously reported, the company's commitment to wastewater projects further materialized in CWL's July 2020 issuance of **\$26 million in Public Utility System Revenue Bonds**. While earmarked in part for then-current wastewater capital projects, the issue of these bonds allowed CWL reserve funds to be utilized for other projects, like the Westside WWTP. CWL furthered this commitment in May 2022 with the issuance of **\$35.5 million in Public Utility System Revenue Bonds** that were used directly toward the Westside WWTP replacement. CWL's application for ARPA funding submitted in November 2022 was awarded **\$5 million in grant allocation** through the Natural Resources Division of the Arkansas Department of Agriculture for the Westside WWTP. The grant proceeds offset the overall WWTP project costs.

The DEQ understands that SSO mitigation is an iterative and ongoing activity. CWL is pleased to present the activities outlined in this report as evidence of CWL's ongoing efforts in SSO mitigation. CWL firmly believes that these proactive efforts and associated capital costs, as well as the future corrective actions identified in CWL's CAP Addendum, demonstrate CWL's dedication to collection system improvements.

This CAP report represents CWL's fulfillment of the DEQ's request for an annual progress report and constitutes CWL's sincere interest in ongoing and transparent communication with the DEQ beyond the fulfillment of our voluntary commitment of a Progress Report every two years, as presented in item IV of the Addendum to CWL CAP.

2. Corrective Action Plan Activities – 2024

CWL is pleased to report the corrective actions, as presented in the following sections, achieved in 2024 toward efforts to further mitigate SSOs in the collection system. To-date, the milestones outlined in CWL’s CAP submitted to the DEQ on March 28, 2016 and Addendum to CWL CAP submitted to the DEQ on April 14, 2016 have been achieved or are on schedule to be achieved by the respective target completion date. For the period of November 1, 2023 thru October 31, 2024, CWL has documented CMOM expenses totaling over **\$3.3 million** and capital costs totaling over **\$19.9 million**.

3. Phase II Corrective Action Plan Activities – Status

As identified in CWL’s CAP, Phase II milestones are actions targeted for completion from the 1st Quarter of 2021 thru the 4th Quarter of 2025. The following Sections 4 thru 7 provide a summary of CWL’s Phase II accomplishments as of November 1, 2024.

4. Phase II Capital Improvements

CWL is pleased to report that progress continues on-schedule for Phase II Capital Improvements. The following Sections 4.1 thru 4.3 summarize the corrective action progress accomplished both prior to and in 2024 toward efforts on this portion of Milestone #2 of Phase II, targeted for completion by December 31, 2025.

As stated in the CAP, CWL agrees with the DEQ that mitigation efforts and associated capital improvement needs and timing are an iterative and ongoing process. Additionally, it is important to recognize and acknowledge the potential impacts on construction projects of the on-going delays in the supply chains. Despite challenges, CWL is pleased to present the status of Phase II improvements as summarized in Table 4-1.

Table 4-1: Phase II Capital Improvements (As of November 1, 2024)

Capital Improvement	Updated Cost Est.	Current Status
Westside WWTP Replacement	\$73 million	Construction Complete
Kitchen Interceptor – Phase I	\$1.3 million	Easement Acquisition in Progress
Sports Complex Lift Station & Force Main Upgrades	\$350,000	In Design

4.1. Westside WWTP Replacement

As previously reported, CWL began preliminary efforts toward an in-depth study of the Westside WWTP regarding the adequacy of the 1977 trickling filter Plant's biological and hydraulic capacity for the long-term system needs with MW&Y (now Olsson) in the first quarter of 2015. In 2019, CWL contracted Olsson as the engineering firm and Van Horn as the CMAR for the replacement of the WWTP to accommodate estimated flow requirements with system growth and potentially more stringent regulatory requirements in the future. CWL officially identified the Westside WWTP as a Phase II Capital Improvement project in 2020. The status of the now completed project is summarized in Table 4.2.

Table 4-2: Westside WWTP Contract Section Statuses (As of November 2024)

Contract Number	Contract Section	Cost to Date	Estimated Cost	Current Status
1	Tree Clearing	\$74,000	\$82,000	Completed July 2021
2	Road Work	\$752,000	\$890,000	Completed November 2021
2	Force Main Relocation & Mass Grading Site Work	\$5.64 million	\$5.64 million	Completed September 2022
3	Under Slab Pipe Procurement	\$1.13 million	\$1.15 million	Completed February 2023
3	Ovivo & Flygt Equipment Procurement	\$2.38 million	\$2.36 million	Completed November 2023
3	Process & Structures	\$56.48 million	\$59.64 million	Operational August 2024

The final design of the WWTP, along with the Main Lift Station replacement, increased the Westside hydraulic capacity from approximately 7 MGD to 17 MGD and the biological treatment capacity from approximately 6,880 lbs/day BOD to 9,950 lbs/day BOD. This increased capacity not only provides for future growth needs but also optimizes operation during wet weather flows and thus significantly enhances SSO mitigation in west Jonesboro. In addition, and as with the

Main Lift Station, replacing the over 40-year-old WWTP addressed maintenance issues and provided a more reliable, efficient, and resilient plant.

Based on preliminary conversations with the DEQ, the Plant design was expanded in 2021 to include anaerobic selector and fermentation basins for enhanced nutrient treatment. Olsson resubmitted the construction permit, with these additions, to the DEQ in November 2021.

By April 2022, ADH design approval and appropriate DEQ and City of Jonesboro permits were acquired, and the Process & Structures section of the contract began in June 2022. **CWL is pleased to report that the initial start-up of the plant commenced on August 1, 2024, with complete transition of wastewater treatment to the new plant on August 7, 2024.** Substantial completion of the site is shown in Figure 4-1.

See Appendix A for an overhead view of the entire new facility.

Figure 4-1: New Westside WWTP (October 2024)



4.1.1. 24" Force Main

As part of the Westside WWTP replacement, a new 24" force main from the new Main Lift Station to the new WWTP was installed. The force main operates in parallel to the previously existing 20" force main. Plans for the new force main were approved by ADH in September 2023. CWL awarded this project to R.L. Persons Construction, LLC. in October 2023 and construction began in November 2023. The project was complete in April 2024, with investments over **\$572,000**.

4.1.2. Biosolids Land Application System

Another integral part of the new Westside WWTP is the biosolids land application upgrades. To handle sludge more efficiently, CWL designed a pump, pipe, and irrigation head system, similar to the Eastside WWTP Class B biosolids system, for land application of the sludge onto the permitted fields. The DEQ approved the utilization of the new system in November 2024. CWL has invested over **\$165,000** in this project to date.

4.1.3. ARPA Grant

CWL applied for ARPA funding through the Natural Resources Division of the Arkansas Department of Agriculture for the Westside WWTP in November of 2022. CWL was awarded the maximum allowable grant allocation for a single wastewater project of **\$5 million**. This grant helps offset some of the costs for a project of this magnitude. Thus, providing savings to CWL's customers and aiding in CWL's dedication to SSO mitigation.

4.2. Kitchen Interceptor – Phase I

The Kitchen improvements were originally defined as various upgrades to the existing gravity sewer network in the midtown area bordered by E. Nettleton Ave, Kitchen St, Osler Dr, and E. Washington Ave (JB19 and JB20; App B, Basin Delineation). This Phase I scope of work is proposed as 2750' of an 18"-diameter gravity sewer interceptor extending upstream from the west end of the Midtown Interceptor south to Matthews Ave. CWL plans to continue evaluation of the area's needs and design additional phased improvements as may be warranted.

CWL has worked with RJN and the CWL sewer hydraulic model to determine the optimal upgraded pipe size and Fisher and Arnold, Inc. to determine the route for these initial improvements. CWL has estimated the total cost for these upgrades at **\$1.3 million** and has invested over **\$140,000** in the project to-date. Easement acquisitions continue, and the project is planned to begin construction in 2025. See Appendix A for a map summarizing the planned Phase I improvements.

4.3. Sports Complex Lift Station & Force Main Upgrades

Targeted in part through the previous Lift Station and Force Main Evaluation findings (2018 thru 2020 CAP Reports), the Sports Complex Lift Station and respective force main were identified in 2021 for improvements due to identified capacity constraints and operational issues. Continued efforts on the station include evaluation of station performance versus design performance and application and evaluation of the ongoing adequacy of the force main size. CWL anticipates the complete project scope of work to be finalized in the first quarter of 2025. CWL has estimated a preliminary budgeted cost of **\$350,000**. See Appendix A for a map of the lift station and force main locations.

5. Phase II SSES Status

As a portion of Milestone #2 of Phase II of CAP Addendum, CWL provided a target completion date of December 31, 2025 for achieving an SSES of an additional 1/3 of the CWL collection system, with an average of approximately 27 miles per year. CWL prioritized basins JB06, JB13, and JB19 to study in 2024 (App B, Basin Delineation) for an estimated total of approximately 32 miles of the sewer system. The status and results of the 2024 activities under this milestone, as of November 1, 2024, are briefly outlined in the following section. CWL has now completed inspection, evaluation, and resultant repair identification of approximately 285 miles of the collection system under the CAP in the last 8 ½ years. See Appendix C, Basin SSES Status, for a summary of the SSES activities for CWL basins, designating years worked and CAP Phase.

5.1. Phase II SSES Activities - Status & Results

The following Table 5-1 provides a summary of SSES activities and current results for JB06, JB13, and JB19.

Table 5-1: 2024 SSES Activities (As of November 1, 2024)

Service	Quantity			
	JB 06	JB 13	JB 19	2024 Basins Total
Manhole Inspections (1)	190	307	264	761
Manhole Resultant Repairs Identified/Repaired	137/6	64/22	145/3	346/31
Line Testing and Repairs				
Smoke Test (ft) (2)	50,893	56,736	63,038	170,667
Dye Test	82	7	80	169
CCTV (ft) (3)	23,483	1,106	19,607	44,196
Mains Cleaned (ft)	25,203	1,982	33,891	61,076
Roots Cut (ft) (6)	0	0	1,231	1,231
SL-Rat® (ft) (4)	35,442	59,197	57,483	152,122
Replaced/Repaired Clean Out Caps	87	35	59	181
Laterals Identified/Repaired (5)	20/4	11/9	36/14	67/27
Resultant Main Repairs Identified/Repaired (7)	8/0	0/0	23/0	31/0

Table 5-1: 2024 SSES Activities (As of November 1, 2024)

Notes:

- (1) Manhole inspections are 100% complete.
- (2) 100% of each JB was smoke tested, except for areas around critical medical facilities which were inspected thru CCTV in lieu of smoke testing (CCTV footage is included).
- (3) CCTV footage shown from SL-Rat® assessments and smoke test defects identified.
- (4) SL-Rat® assessments of 12" lines and smaller.
Footage includes line segments that were re-assessed due to SL-Rat® score following cleaning of lines.
- (5) Customers notified of lateral defects / Laterals repaired by customers and inspected by CWL or abandoned lateral capped by CWL.
- (6) Chemical root treatment footage for 2024 basins included in maintenance totals reported in Table 13-1.
- (7) Evaluation and resultant repair identification in progress.

As in past years, CWL began the 2024 SSES activities with 100% inspection of the manholes in each of the three basins selected. As of November 1, 2024, manhole inspections are complete. Detailed inspection results are available upon request.

In addition to the manhole inspections, CWL crews cleaned main lines within each basin. The segments cleaned were identified as having potential obstructions based on SL-Rat® evaluations and CCTV inspections. See Section 13.3 for further SL-Rat® information.

Smoke testing is also complete in each basin. Through this process, CWL replaced clean out caps and identified potential main line and additional manhole defects. Crews identified possible defects from smoke testing through CCTV inspection, with the aid of dye testing. As CCTV inspection footage is reviewed, CWL will determine appropriate rehab for main line defects identified and notify customers of lateral defects. All lateral defects are being coordinated through CWL's Sewer Lateral Repair Program (Section 14). Detailed smoke testing and CCTV inspection results are available upon request.

5.2. 2023 SSES Status – Final

As reported in 2023, CWL prioritized basins JB03, JB11, and JB16 (App B, Basin Delineation) to study in 2023 for an estimated total of approximately 35 miles of the sewer system. At the time of the 2023 annual report, CCTV inspection was incomplete. These efforts were completed in late 2023 and early 2024.

The following Table 5-2 provides the final summary for the 2023 SSES activities for JB03, JB11, and JB16. Detailed reports are available upon request.

Table 5-2: 2023 SSES Activities – Evaluation Final Results (Repairs as of November 1, 2024)

Service	Quantity			
	JB 03	JB 11	JB 16	2023 Basins Total
Manhole Inspections (1)	166	86	423	675
Manhole Resultant Repairs Identified/Repaired	77/61	71/19	153/74	301/154
Line Testing and Repairs				
Smoke Test (ft) (2)	42,460	22,854	118,864	184,178
Dye Test	13	49	51	113
CCTV (ft) (3)	1,276	22,679	15,128	39,083
Mains Cleaned (ft)	335	19,435	10,254	30,024
Roots Cut (ft) (6)	0	0	993	993
SL-Rat® (ft) (4)	24,955	21,488	84,737	131,180
Replaced/Repaired Clean Out Caps	48	28	100	176
Laterals Identified/Repaired (5)	11/3	30/23	36/16	77/42
Resultant Main Repairs Identified/Repaired	0/0	30/12	8/1	38/13

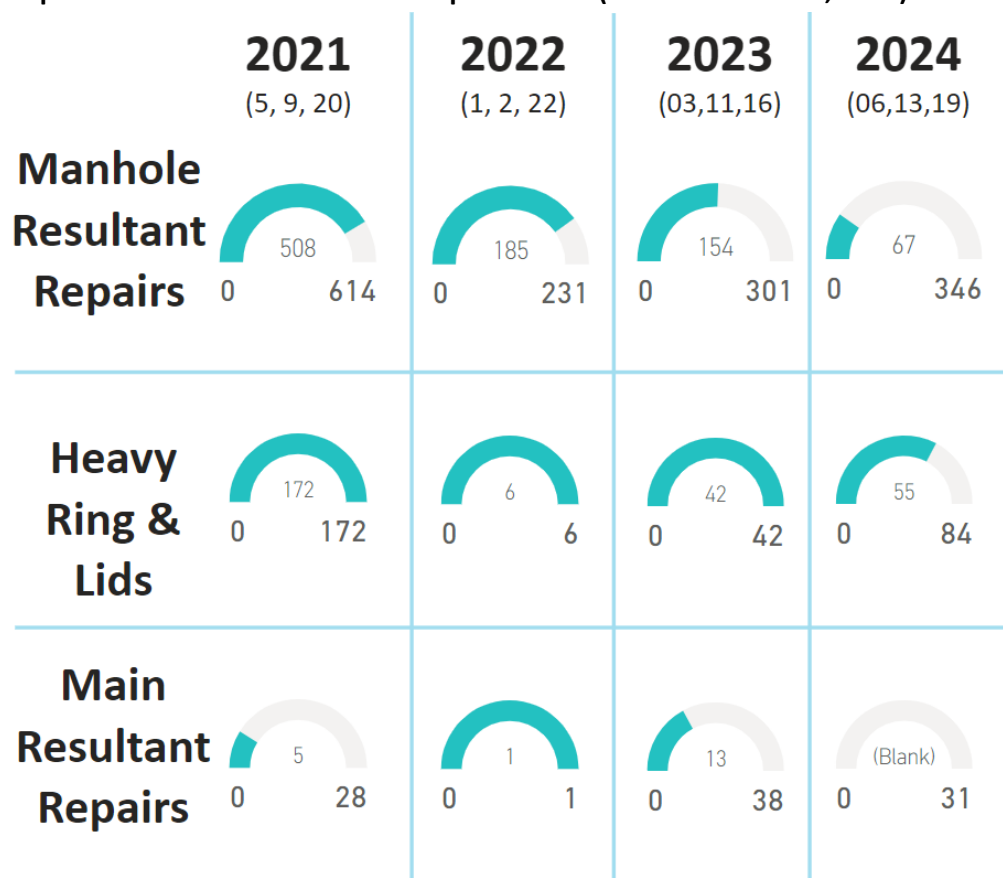
Notes:

- (1) Manhole inspections are 100% complete.
- (2) 100% of each JB was smoke tested.
- (3) CCTV footage shown from SL-Rat® assessments and smoke test defects identified.
- (4) SL-Rat® assessments of 12" lines and smaller.
Footage includes line segments that were re-assessed due to SL-Rat® score following cleaning of lines.
- (5) Customers notified of lateral defects / Laterals repaired by customers and inspected by CWL or abandoned lateral capped by CWL.
- (6) Chemical root treatment footage for 2023 basins reported in 2023 CAP Report.

6. Phase II SSES Resultant Repairs

As a portion of Milestone #2 of Phase III of CAP Addendum, CWL provided a target completion date of December 31, 2030 for achieving Phase II SSES Resultant Repairs. Graph 6-1 summarizes the status of CAP Phase II resultant repairs, as of November 1, 2024. Sections 6.1 thru 6.4 briefly describe these repairs, including brick manhole cementitious lining.

Graph 6-1: Phase II SSES Resultant Repairs Status (As of November 1, 2024)



6.1. Manhole SSES Resultant Repairs

As presented in Section 5.1, CWL identified 346 manhole repairs in 2024. As previously reported, a total of 1146 manhole resultant repairs were already identified in the Phase II basins. CWL began the manhole resultant repairs in November 2022, with an additional 489 manholes repaired to-date in 2024. Detailed spreadsheets regarding the repairs identified are available upon request and the status of repairs will be updated as applicable.

6.2. Brick Manhole Cementitious Lining Rehabilitation

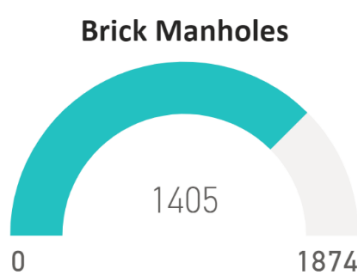
As stated in previous reports, CWL conducted an evaluation of the brick manholes previously rehabbed in the late 1980s and early 1990s for updated rehab needs. CWL determined that the optimum course of action at this time, considering the current available information, is to contract out a complete rehabilitation of all brick manholes, both previously rehabbed and untouched, within each year's studied basins. This decision was based on the evaluation and consultation with other utilities and engineering consultants.

In April 2024, CWL let a contract for the cementitious lining of brick manholes identified in the 2020 and 2021 SSES basins and later added manholes from the 2022 and 2023 SSES basins, as well as additional brick manholes outside of studied basins. Only the manholes not conflicting

with the current sewer main CIPP lining project (Section 13.6) was included in this project. CWL awarded the contract to Kim Construction Company, Inc. of Steger, IL. Work began in May of 2024. Kim lined a total of 629 manholes. Work was completed in September of 2024 at a final cost of over **\$910,000**.

For the 2024 basins, CWL has identified 311 brick manholes for rehabilitation. Detailed spreadsheets regarding the manholes identified are available upon request. The status of the Phase I and II brick manhole lining initiative is shown in the following graph.

Graph 6-2: Phase I & II Brick Manhole Cementitious Lining (As of November 1, 2024)



6.3. Manhole Heavy Ring & Lid Replacements

As previously reported, CWL also determined that replacing the older-style, heavy ring and lids under the influence of sheet flow in rain events had the potential to significantly reduce I&I. As of November 1, 2024, CWL has utilized in-house personnel to complete the replacement of 275 heavy ring and lids in the Phase II SSES Basins. Detailed spreadsheets regarding these repairs are available upon request.

6.4. Main Line SSES Resultant Repairs

As shown in Table 5.1, CWL identified 31 potential main line defects in the 2024 SSES basins. Appropriate repairs for the main line defects will be assigned after further evaluation of CCTV footage. Detailed spreadsheets regarding the status of main line repairs are available upon request.

CWL continues to evaluate main line repairs for potential candidates for CIPP lining and pipe bursting. CWL keeps an ongoing list of prospective mains, which includes SSES basins' resultant main line repairs as well as additional mains outside of the SSES basins. See Section 13.6 for additional information.

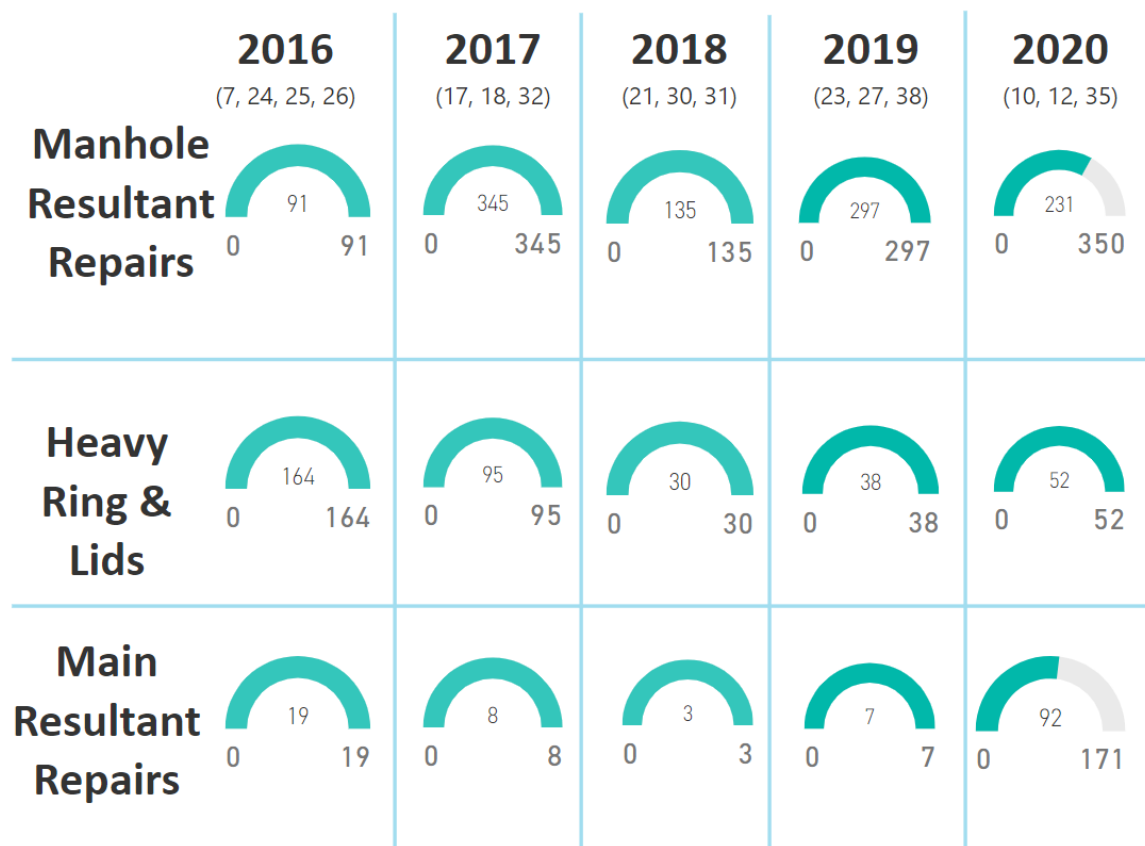
7. Phase I SSES Resultant Repairs – Phase II Milestone

As a portion of Milestone #2 of Phase II of CAP Addendum, CWL provided an original target completion date of December 31, 2025 for achieving Phase I SSES Resultant Repairs. CWL has the remaining Phase I SSES Main Resultant Repairs contracted to be completed by 2026 (Section 13.6). The remaining Phase I SSES Manhole Resultant Repairs are contingent on the completion of the main repairs and will hence be completed once related main repairs are complete. **Taking the current and planned contract work into account, the targeted completion date for this milestone has been adjusted to December 31, 2026.**

As previously discussed with the DEQ and stated in this report, mitigation efforts are dynamic in nature and, as such, target completion date adjustments were anticipated. With this said however, CWL considers overall mitigation improvements ahead of schedule, especially considering the status of Phase II Capital Improvement projects (Section 4).

The following graph summarizes the status of Phase I resultant repairs, as of November 1, 2024. This includes 59 sewer main repairs under the current CIPP and Pipe Bursting contracts (Section 13.6) at the end of 2023 and in 2024. Detailed spreadsheets regarding this information are available upon request.

Graph 7-1: Phase I SSES Resultant Repairs Status (As of November 1, 2024)



8. Phase I Corrective Action Plan Activities – Status

As identified in CWL’s CAP, Phase I milestones were actions targeted for completion from the 1st Quarter of 2016 thru the 4th Quarter of 2020. As previously reported, all Phase I milestones have been achieved. The following Sections 9 and 10 provide a summary of the accomplishments under this first Phase of the CWL CAP.

9. Phase I Capital Improvements Status

In the 2017 CAP Progress Report, CWL summarized four capital improvement projects as part of Phase 1 of the CAP. As provided in last year’s annual report, CWL was pleased to report on the **completion of all Phase I Capital Improvements** and thus meeting that portion of Milestone #5 of Phase I of CAP Addendum.

Table 9-1 provides the final costs and project status for each improvement. In addition, see Appendix D for conceptual maps summarizing the completed improvements.

Table 9-1: Phase I Capital Improvements (As of November 1, 2024)

Capital Improvement	Final Costs	Current Status
Eastside WWTP Wet Weather Hydraulic Upgrade	\$15.06 million	Construction Complete
Midtown Interceptor	\$6.32 million	Construction Complete
Ridgecrest Lift Station & Force Main Upgrades	\$2.97 million	Construction Complete
Northwest (Main) Lift Station Replacement	\$7.82 million	Construction Complete

10. Finalized Phase I SSES Activities – Summary

As provided in the 2021 annual report, CWL was pleased to report **achieving over 37% SSES of the CWL collection system** and thus meeting that portion of Milestone #5 of Phase I of CAP Addendum. Table 10-1 provides a summary of Phase I SSES activities and Appendix C, Basin SSES Status, provides both the basins and years studied for CAP Phase I. In addition, the status of resultant repairs for Phase I is summarized in Section 7. Detailed reports are available upon request.

Table 10-1: Finalized Phase I SSES Activities – Summary

Service	Phase I Total Quantities
Manhole Inspections	3,834
Smoke Test (ft)	832,780
CCTV (ft)	218,422
Replaced/Repaired Clean Out Caps	629

11.2020 & 2022 Public Utility System Revenue Bonds – Wastewater

As reported in 2020, CWL issued **\$26 million in Public Utility System Revenue Bonds** during July 2020 for the acquisition, construction, and improvement of CWL sewer and electric facilities. A portion of these funds were used toward the Main Lift Station replacement (Section 9) and four-mile Midtown Interceptor construction (Section 9). The issuance of these bonds freed up CWL reserve funds to be utilized for other sewer system improvements, particularly the Westside WWTP replacement (Section 4.1). CWL furthered this commitment in May 2022 with the issuance of **\$35.5 million in Public Utility System Revenue Bonds** to be used toward the Westside WWTP replacement. CWL feels these actions build on the company's commitment to sewer system improvements.

12.CMOM Software – GIS & CMMS Status

As reported in previous CWL Progress Reports, CWL now utilizes ESRI/ArcGIS for GIS-based mapping of the sanitary sewer system and continues to explore additional long-term solutions for CMOM data management. The goal, as previously reported, is to further develop internal databases and data collection processes that allow integration with CWL's IBM i server and to identify/develop software and mapping solutions that would add value to CWL's existing system and avoid duplication of many processes.

Since 2019, CWL has partnered with CDM Smith Inc. initially on the design and implementation of the sewer geodatabase and currently with the continued maintenance and evolution of the GIS-based mapping. These efforts also include the development of associated processes and applications, particularly to track sewer maintenance and SSES activities.

With the assistance of CDM Smith, CWL continues to evaluate CMMS providers to identify, procure, and implement a solution to support asset management within the organization. To that

end, CWL recently entered into an agreement with CDM Smith for assistance in both the finalization of the CMMS RFP and selection of the CMMS provider.

CWL has invested to-date almost **\$548,000** toward this effort for consulting, software, and hardware, with almost **\$9,000** spent in 2024.

13.Collection System Maintenance

In addition to the SSES activities of the three 2024 basins and all SSES resultant repairs outlined in previous sections, CWL performed the SSO corrective actions summarized in Table 13-1 as part of the routine inspection and maintenance of the collection system in various other areas throughout the system.

Table 13-1: 2024 Routine Collection System Maintenance (November 1, 2023 thru October 31, 2024)

Service	Quantity
	Routine Maintenance
Manhole Improvements:	
Repair/Seal Manhole	48
Adjusted Manhole	17
Replace Manhole Ring	8
Line Testing and Repairs:	
Smoke Test (ft)	0
Dye Test	26
CCTV (ft)	121,249
Main Cleaned (ft)	295,865
Grease Treated (ft)	15,963
Roots Cut (ft)	15,849
SL-Rat® (ft) (1)	1,820,303
Laterals Identified / Repaired (2)	66/65
Sewer Main Repairs:	
Point Patch	43
Other Main Repairs	1
Chemical Root Treatment (ft) (3)	15,219
Capped Abandoned Laterals	0
CWL Point Patch Abandoned Laterals	14
Annual Inspections:	
Ditch Crossings Inspected	50
Air Relief Valves Inspected	9
Back-Lot Lines Inspected	56

Notes:

(1) SL-Rat® assessments of 12" lines and smaller.

Footage includes lines segments that were re-assessed due to SL-Rat® score following cleaning of lines.

(2) Customers notified of lateral defects / Laterals repaired by customers and inspected by CWL.

(3) Includes chemical root treatment footage in 2024 SSES basins.

The following sections briefly provide further details for some of these SSO corrective actions.

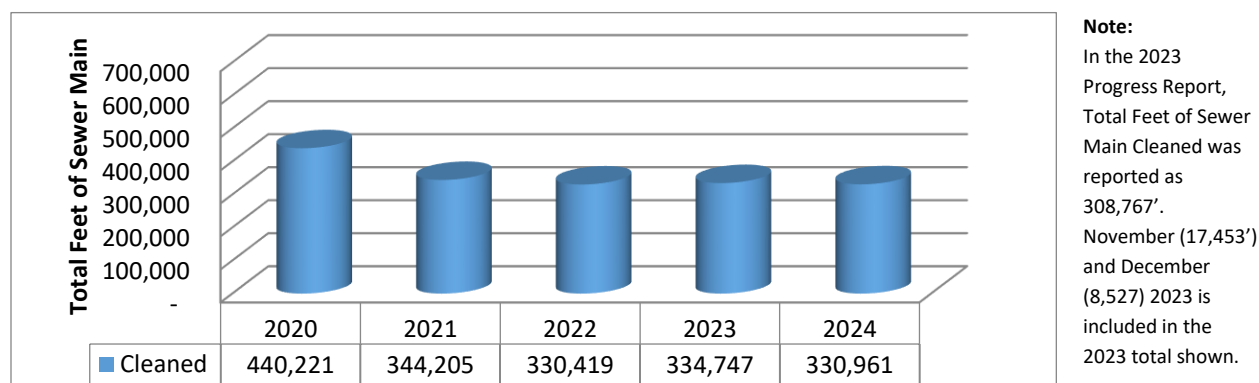
13.1. CCTV Training & Software/Hardware

CWL understands the importance of certifying CCTV operators to code line segments utilizing the NASSCO standards. Eleven CWL employees were certified or recertified through the NASSCO's Pipeline Assessment Certification Program in May of 2024. CWL uses Phoenix software on both CCTV camera vans to code line segments. CWL purchased a video and master control unit for the Aries Camera System, which enables the camera system to communicate with the coding software in December of 2023. CWL invested over **\$35,000** in this training, software, and hardware.

13.2. Sewer Mains Cleaned

As presented in the CAP, CWL sewer service trucks maintain the system through routine cleaning. Graph 13-1 provides a summary of the past 4 years' totals, along with the total footage cleaned for January 1st thru October 31st of 2024.

Graph 13-1: Sewer Mains Cleaned (2020 thru October 31, 2024)



The reduced cleaning footage in recent years, as shown in Graph 13-1 above, can be attributed to the efficiencies CWL is realizing through use of the SL-Rat®. See the following Section 13.3 for additional details.

As discussed in Section 13.8 of the 2023 CAP report, CWL's new sewer jetter nozzle provides a wider cleaning swath which makes the process more proficient in cleaning large-diameter trunk lines. In 2024, CWL utilized the new sewer jetter nozzle to clean approximately 6,916' of 24" vitrified clay pipe.

13.3. SL-Rat® Activities

As previously reported, CWL began utilizing the SL-Rat® for acoustic inspections in July of 2016 to increase efficiency of sewer line blockage assessment. Lines that score poor to blocked are hydro cleaned and re-assessed. Should the line continue to score poor to blocked for its size, the

line segment is then inspected through CCTV to further evaluate the apparent blockage. If the operator identifies roots while hydro cleaning, the line segment is cleaned with the jetter nozzle in tandem with CCTV to inspect and confirm that roots are cut and removed.

CWL has found this acoustic tool allows for more efficient hydro cleaning efforts and CCTV inspections and thus increased SSES productivity and SSO mitigation. The reduced cleaning footage in CWL's routine maintenance of the collection system illustrates how effective this tool is to concentrate cleaning efforts in locations warranting the effort.

Based on continued positive results, CWL again performed 100% SL-Rat® inspection of 12" and smaller mains in the three 2024 SSES basins, as well as in the rest of the collection system. Table 13-2 shows the ratings of the total line segments, including the approximately 152,122' in the 2024 SSES basin segments, tested with the SL-Rat® from November 1, 2023 thru October 31, 2024. A detailed report of the line segments tested in the 2024 SSES basins and a complete report of all line segments tested in 2024 are available upon request.

Table 13-2: SL-Rat® Sewer Line Assessment Results (November 1, 2023 thru October 31, 2024)

SL-Rat® Data for Total System	
Rating (1)	Quantity (line segments)
10-5	8,124
4-0	847
Footage= 1,972,380	

13.4. Grease Treated Line Segments

To further control grease in the sewer system, CWL uses a degreaser system on its sewer combination truck to treat sewer line segments. CWL proactively treated approximately 14,105' of sewer mains with a chemical degreaser in 2024 across the entire sewer system.

13.5. Root Control Activities

Through an existing root control contract with Duke's, approximately 15,219' of sewer mains were chemically treated in 2024. As previously reported, CWL continues proactive efforts to chemically treat identified mains as expeditiously as practical. CWL re-inspects a portion of chemically treated segments via CCTV to ensure no new root growth. A detailed report of the line segments, located throughout the collection system, chemically treated in 2024 is available upon request.

In addition to chemical treatment, CWL now uses CCTV equipment in coordination with sewer trucks equipped with jetter nozzles for controlling roots within the collection system. The camera operator follows the jetter nozzle down the line segment to ensure roots are cut and removed.

Approximately 17,080' of sewer mains were root cut throughout the 40 basins of the system November 1, 2023 thru October 31, 2024.

13.6.Sewer Main CIPP Lining/Pipe Bursting

CWL evaluates each main line defect as a potential candidate for CIPP lining and as reported in 2022, now includes pipe bursting as a potential solution in evaluations. Therefore, the list of prospective mains, which includes both resultant repairs from SSES basins as well as additional mains identified for repairs, include both CIPP lining and pipe bursting solutions.

As previously reported, CWL let a contract for bids on main repairs in November 2021. The contract included approximately 8,000' of CIPP lining. This contract, awarded to Humbard Contracting Inc. (Humbard) of Green Forest, AR, was amended in October 2022 to include approximately 5,400' of CIPP lining and 2,600' of 6" to 8" pipe bursting.

Humbard began CIPP rehabilitation in August 2022, with pipe bursting scheduled to begin in 2023. As of November 1, 2024, Humbard has completed this contract with approximately 6,600' of CIPP lining installed and 2,800' of sewer mains pipe burst.

In August 2023, CWL let new contracts for bids on main repairs. The contracts included approximately 30,400' of CIPP lining and 29,300' of pipe bursting over a three-year contract. Humbard was awarded both contracts and began work in October 2023. As of November 1, 2024 approximately 11,900' CIPP lining has been installed and 10,600' of sewer mains have been pipe burst on these contracts. With the addition of the original contract and the two new contracts, CWL has invested over **\$2.68 million** to date. A detailed spreadsheet regarding the sewer mains identified and the rehabilitation selected for each main is available upon request.

13.7.Pipe Seals Chemical Grouting

CWL is devoted to combating I&I. One potential source of infiltration is through pipe seals in manholes. CWL contracted Kim Construction in July of 2024 to chemical grout and seal pipe penetrations at pipe seals in manholes located in JB01 (App B, Basin Delineation), with a few in JB22. Kim grouted and sealed 202 manholes, with completion in September of 2024. Detailed spreadsheets regarding these repairs are available upon request. CWL invested over **\$41,000** in this project.

13.8.Aggie Rd Sewer Upgrade

Through ongoing evaluations, CWL identified an 8"-diameter gravity sewer line near Aggie Road for replacement. This line crosses under two railroad tracks. CWL plans to construct a new 18"-diameter line under the tracks to the newly constructed Midtown Interceptor (Section 9) and properly abandon the existing 8"-diameter line. This new line will be constructed deeper and sewer further west than the existing line, allowing for the future abandonment of an additional

existing sewer railroad crossing, also identified for replacement. The project was awarded to Cline NEA Underground, Inc. of Jonesboro, AR in August of 2024. With railroad permits and materials acquired, construction is planned for the second quarter of 2025, contingent on contractor's availability. CWL has invested over **\$138,000** in this improvement to date.

13.9. Dead End Sewer Mains Manhole Installations

As a result of performing SSES in older basins during 2020, CWL began an effort to contract out the installation of manholes on existing dead end sewer mains. These improvements will not only facilitate any required rehabilitation on associated sewer mains but also future cleaning and inspecting needs.

Shannon Kee Construction, LLC is currently contracted for the installation of these manholes. A total of 94 locations have been identified for new manholes across the sewer system, with 37 installed to-date. CWL has invested over **\$365,000** in this effort. Detailed information regarding manhole locations is available upon request.

14. Sewer Lateral Repair Program Status

Formally started in 2013 and refined in 2016, CWL's Sewer Lateral Repair Program is utilized to address identified sewer lateral defects both inside and outside of the SSES basins being evaluated each year. The program consists of detailed lateral defect records and associated customer interactions. Upon confirmation of a private lateral defect, the property owner is notified, and appropriate follow-up is then performed and tracked through the program. The following Table 14-1 summarizes CWL's efforts since 2016 by laterals identified and current repair status totals for all basins. Detailed spreadsheets regarding these repairs are available upon request.

Table 14-1: Total Lateral Defects Identified & Current Repair Status (As of November 1, 2024)

Total	Identified	Repaired	Percent Complete
2016	94	82	87%
2017	37	36	97%
2018	58	48	83%
2019	33	27	82%
2020	168	99	59%
2021	143	106	74%
2022	66	58	88%
2023	184	147	80%
2024	133	92	69%
Total	916	695	76%

15.FOG Management Program Status

As presented in the CAP, CWL’s FOG Management Program monitors FSEs through quarterly grease interceptor inspections while also conducting FOG public outreach by means of educational brochures, company website, customer billing, newspaper, television, and/or other media outlets such as Facebook, Twitter, and Instagram. Since the initial CAP, CWL has made significant efforts to further enhance its FOG Management Program, as presented in previous Progress Reports, with the expansions of quarterly grease interceptor inspections and FOG outreach to public schools; development of several FOG brochures and postcards; and enhancement of FSE monitoring activities within the collection system.

CWL’s FOG Management Team is comprised of representatives from the following departments: Water and Sewer Service/Maintenance, Water and Wastewater Treatment, Laboratory, Engineering and General Operations. The Team meets routinely to review and evaluate current FOG Management Program elements, identify potential ways to enhance the program, and ensure implementation of the previously mentioned inspection and outreach activities.

The FOG Management Team continues to work diligently to further enhance and expand its outreach efforts through increased monitoring and sampling efforts and postcard distributions. As previously reported, increased monitoring and sampling within the collection system has allowed CWL opportunities to collaborate with FSEs and distribute outreach material concerning the proper disposal of FOG. Door hangers are distributed, when needed, in areas affected by FOG.

The Team began holiday postcard deliveries focused on FOG and “sewer trash” in 2020 and have continued these efforts. The FOG Management Team has developed several seasonal designs focused on FOG and “sewer trash.” Each year postcards are delivered to residential and post office box customers. On November 18, 2024, approximately 45,000 holiday postcards (Appendix E) were mailed.

The on-going efforts of the FOG Management Team allows CWL to continually evaluate and improve, as identified, the current components of the FOG Management Program, with a goal of heightening its effectiveness in SSO mitigation. Please see the FOG Management Program Activity table below for a summary of these efforts.

Table 15-1: FOG Management Program Activity

FOG Management Program Activity	
Activity	2024 Totals
FSE Inspections	1336
FSE FOG Samples	14

Table 15-1: FOG Management Program Activity

FOG Management Program Activity	
Activity	2024 Totals
Postcards	Approx. 45,000
Billboards	1
Social Media	3
Television	12
Radio	2
Employee Newsletter	1
Kids Activity Books	100
Public Outreach ¹	1
FSE Education/ Outreach	4

¹Public Outreach includes booths at job fairs and expositions within the community.

16. Lift Station Maintenance and Improvements

The decommission of the Sage Meadows #1 (Southern Hills) Lift Station and the relocation of the Colony Park Lift Station remain potential positive results of pending residential developments. In general, CWL will ensure any relocation incorporates CWL's enhanced specifications for developer installed lift stations, which as previously reported includes a flow meter, emergency generator, and protective coating on the discharge manhole. These enhanced specifications, therefore, are included in the relocation/replacement of the Beaver Creek Lift Station. Plans have been approved to install additional gravity sewer to the Beaver Creek station from the new Orchard Lift Station. Developer construction is currently underway.

In 2024, CWL identified necessary improvements for the existing Southeast Lift Station. These upgrades were budget for completion in 2025 and include replacing two pumps with dry side submersible type pumps, adding two VFDs, and upgrading the main breaker, generator, and automatic transfer switch. CWL is investigating the need for piping and wet well upgrades as well.

Beyond the potential decommissioning and relocation, replacement, and improvements described above, CWL continues to evaluate and prioritize future lift station needs. This will allow CWL to determine if additional lift station projects should be scheduled for 2025 in conjunction with the completion of the Dorton Road Lift Station improvements and the Wimpy Lift Station evaluation and improvements, discussed in the following Sections, and the Sports Complex Lift Station, discussed in Section 4.3.

16.1. Dorton Road Lift Station Improvements

As outlined in previous reports, CWL identified, in 2021, important improvements for the Dorton Road Lift Station (Appendix F), serving the Jonesboro Industrial Park.

The work was divided into a two-stage project: Stage 1 (Wet Well Rehabilitation) and Stage 2 (Electrical Upgrade). As previously reported, wet well rehabilitation was completed in 2022 and included:

- Sandblasting, priming, and coating the wet well pipe.
- Sandblasting, cementitious lining, and coating the wet well wall and baffle.
- Installing new pipe in the wet well.

Electrical upgrades are nearing completion and include:

- Installing new main breaker, new generator, updated automatic transfer switch, termination enclosure, and four VFDs for arc flash mitigation and enhanced efficiency/reliability.
- Installing an exhaust fan in the vertical ventilation stack for increased ventilation.

Stage 2 began in 2022 with material procurement and is now scheduled for completion in January of 2025. The complete project is estimated at a total cost of **\$1 million**. CWL has invested over **\$779,000** to date in these very important improvements.

16.2. Wimpy Lift Station Basin Evaluation & Force Main Upgrades

As part of the previously reported Lift Station and Force Main Evaluation (2022 Progress Report), CWL Engineering identified the Beaver Creek, Wimpy Lane, Valley View & Oak Park lift station system for further hydraulic analysis. The evaluation of this system continues, which includes discussions with local developers regarding planned improvements and the new Orchard Lift Station (replacing the Beaver Creek station) in the Wimpy Lane basin (Appendix G).

With the continued development in this basin, CWL contracted Crist in 2024 to assist in the evaluation of future growth needs and lift station design. CWL has spent over **\$19,000** on this evaluation to date.

17. ARDOT Sewer Improvements

CWL has partnered with ARDOT on relocating utilities out of construction conflict for numerous ARDOT road improvements within the city limits of Jonesboro. ARDOT Project No. 100657 will widen and extend Dr. Martin Luther King Jr. Drive (MLK). This project presents an opportunity to replace and increase the capacity of the gravity sewer along MLK. Over 7,000 feet of 12"-diameter gravity sewer main will be replaced with 18"-diameter pipe. These improvements are

critical to support industrial loading for the Technology Park area and to foster economic growth and development. With an estimated projected cost of over **\$5 million**, construction began at the end of 2023 and is scheduled for completion in 2025, ensuring long-term infrastructure reliability and capacity for the area.

18.Sewer Hydraulic Model

In 2014, RJN designed a hydraulic model of CWL's sanitary sewer system. This model allowed CWL to identify areas of interest for capital improvement projects (Sections 4 & 9). With many of these projects now complete and with the increased development and growth of the system, CWL contracted RJN in May of 2024 to perform a thorough update of the hydraulic model. This included updates for the new Midtown Interceptor, Ridgecrest Lift Station, and Main Lift Station, as well as updated model populations, lift station pump curves, GPS manhole data, and more. CWL will utilize the updated model to assist in evaluating future capital improvement projects and development inquiries. CWL has invested over **\$29,000** into this project to date.

19.Nestlé Pretreatment Facility Improvements

Since 2001, Nestlé Prepared Foods Company has been located in Jonesboro's Industrial Park. As part of an initial agreement with Nestlé, CWL owns, operates, and maintains the company's pretreatment facility, with Nestlé covering all associated costs.

Two existing drum screens have reached the end of their useful life and are planned for replacement with two new internally fed drum screens, with a shaftless spiral compactor and a capacity of 1,500 gallons per minute each. The project includes mechanical piping improvements for a bypass arrangement which will allow Nestlé to remain operational during the screen installations. These upgrades will ensure the facility continues to adequately protect the sanitary sewer system, as well as the East WWTP, from excess food waste loading. The anticipated cost for the bypass arrangement and drum screen installations is **\$400,000**. CWL began the project in February 2024, with the assistance of Crist, and anticipate completion by end of the third quarter of 2025.

20.Conclusion

CWL is pleased to present the activities outlined in this report as evidence of CWL's ongoing efforts in SSO mitigation. Due to the creative and resilient efforts of CWL personnel, these activities were achieved even while navigating the ongoing supply chain impacts/disruptions.

As stated in the CAP, CWL fully understands the iterative, ongoing nature of this process and is committed to continual improvement of the management and operation of the collection system

and maintaining adequate capacity of the system. This commitment was, in CWL's opinion, even more fully demonstrated in the uncommon and dynamic events of the past five years. CWL believes that these ongoing proactive efforts and associated capital costs, as well as the future corrective actions identified in CWL's CAP Addendum, demonstrate CWL's dedication to collection system improvements.

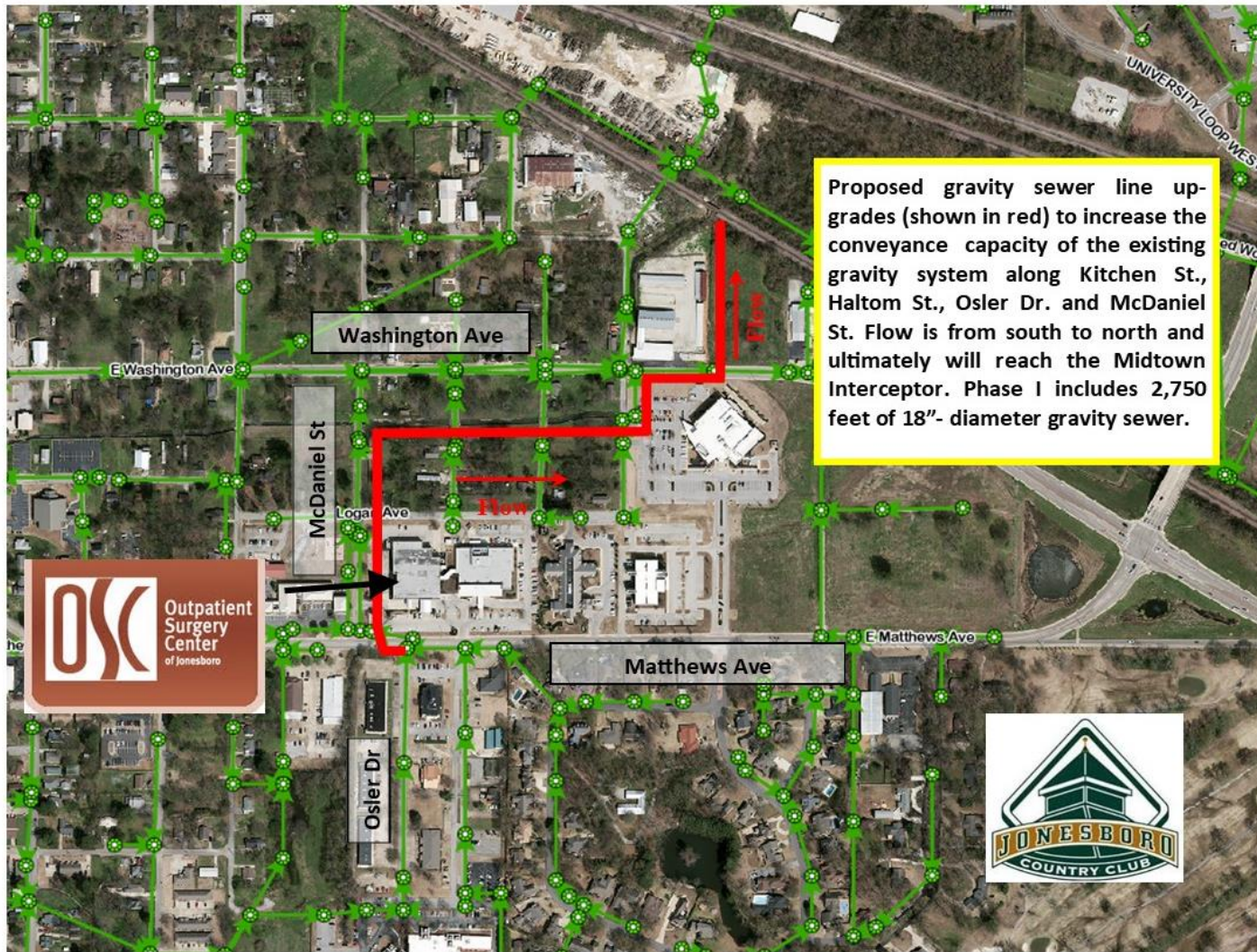
This CAP report represents CWL's fulfillment of DEQ's request for an annual progress report and constitutes CWL's sincere interest in ongoing and transparent communication with the DEQ beyond the fulfillment of our voluntary commitment of a Progress Report every two years, as presented in item IV of the Addendum to CWL CAP.

Appendix A

Phase II Capital Improvements

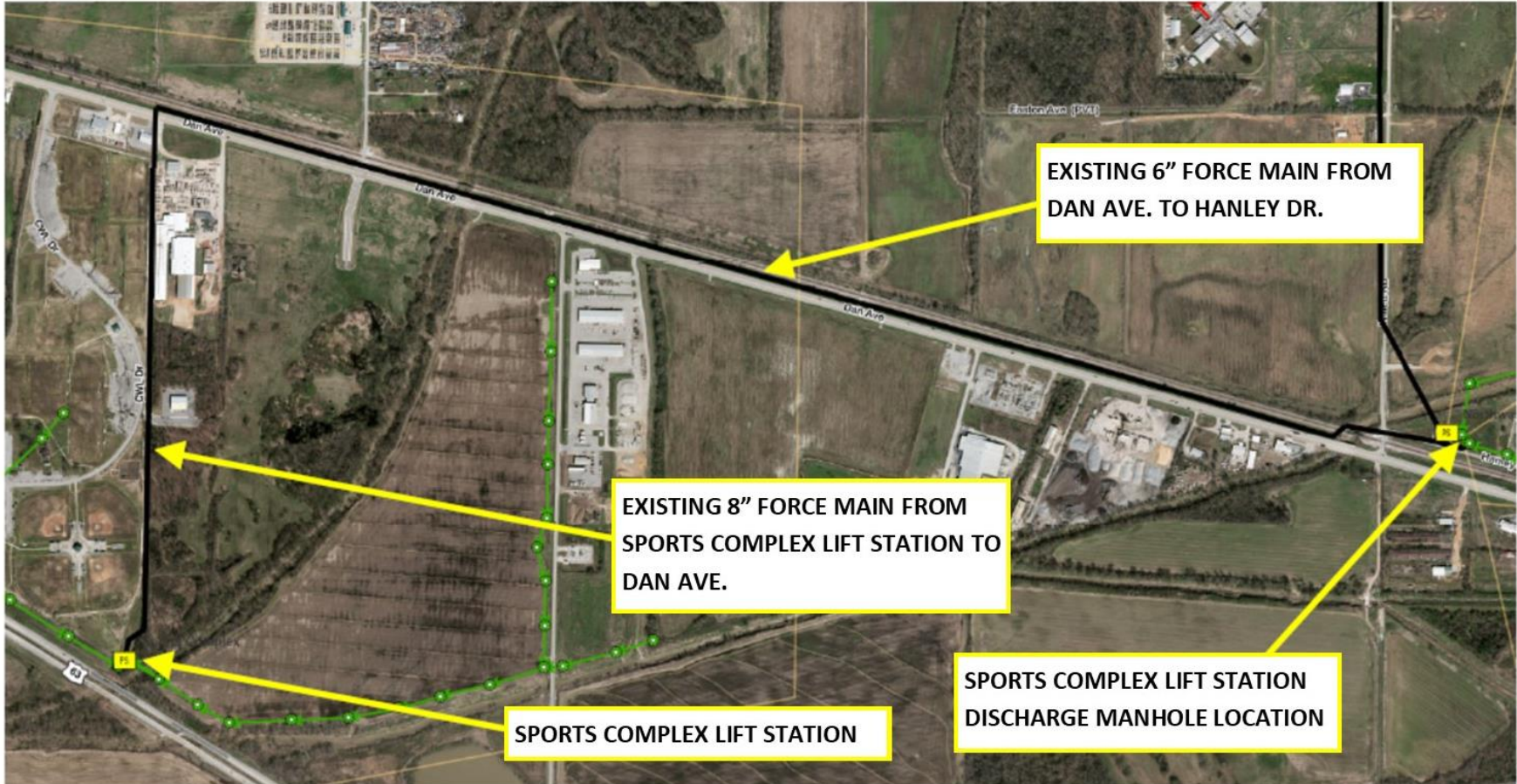


CWL Westside WWTP Replacement 



Kitchen Interceptor Phase I





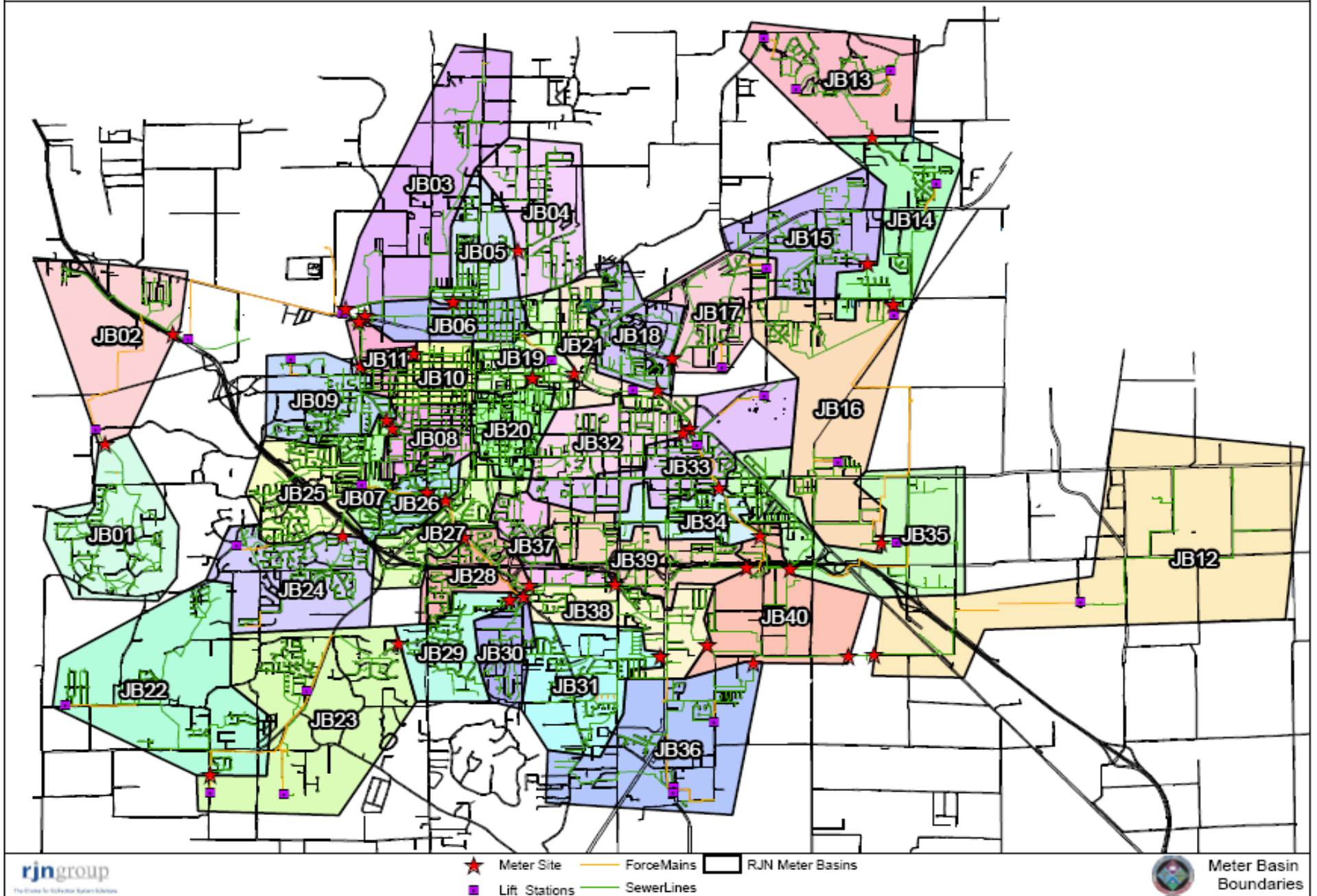
Sports Complex Lift Station



Appendix B

Basin Delineation

Jonesboro, AR



Appendix C

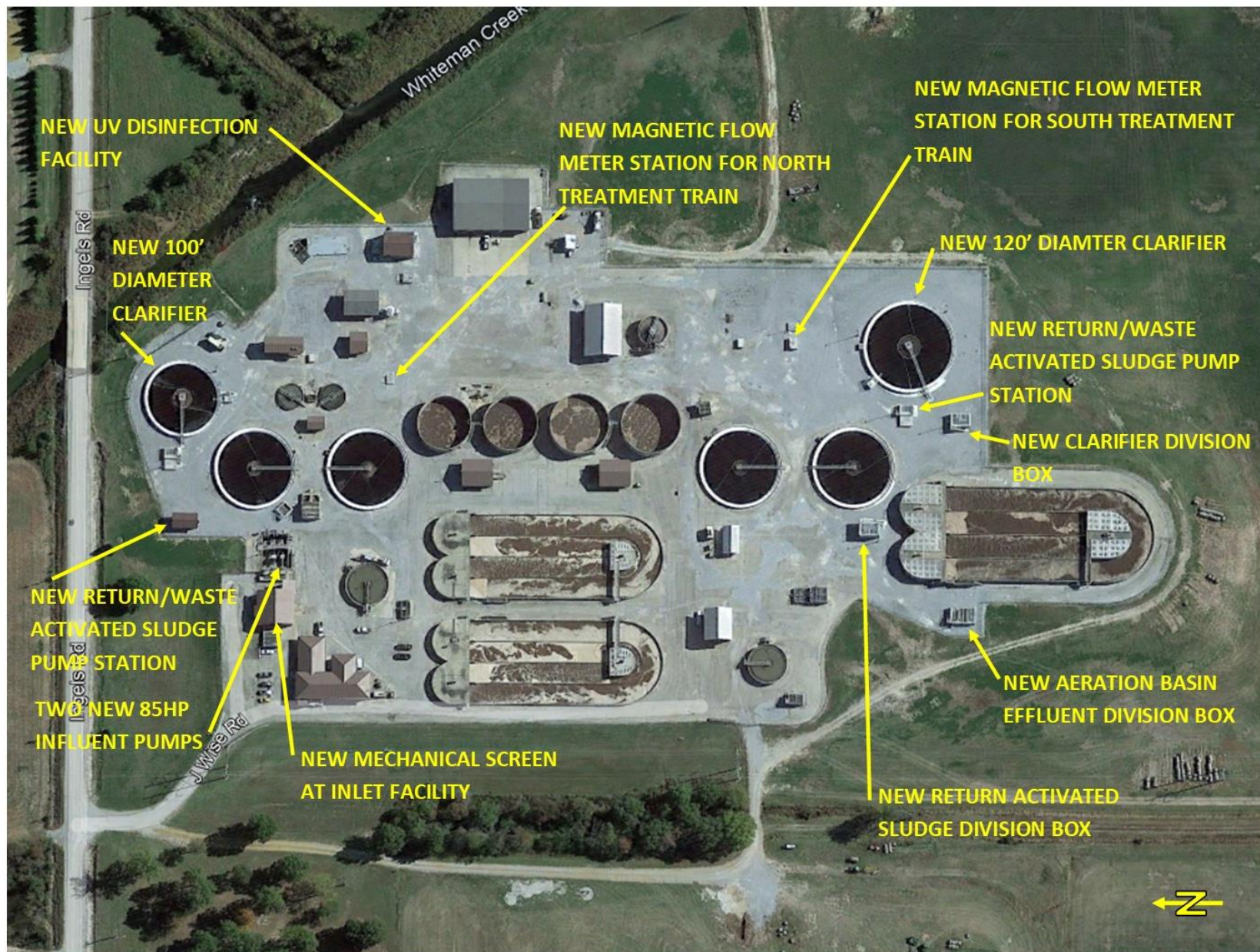
Basin SSES Status

SSES Work by Year

Basin	Year of SSES
JB 01	2022
JB 02	2022
JB 03	2023
JB 04	
JB 05	2021
JB 06	2024
JB 07	2016
JB 08	
JB 09	2021
JB 10	2020
JB 11	2023
JB 12	2020
JB 13	2024
JB 14	
JB 15	
JB 16	2023
JB 17	2017
JB 18	2017
JB 19	2024
JB 20	2021
JB 21	2018
JB 22	2022
JB 23	2019
JB 24	2016
JB 25	2016
JB 26	2016
JB 27	2019
JB 28	
JB 29	
JB 30	2018
JB 31	2018
JB 32	2017
JB 33	
JB 34	
JB 35	2020
JB 36	
JB 37	
JB 38	2019
JB 39	
JB 40	
	Phase I SSES
	Phase II SSES

Appendix D

Phase I Capital Improvements

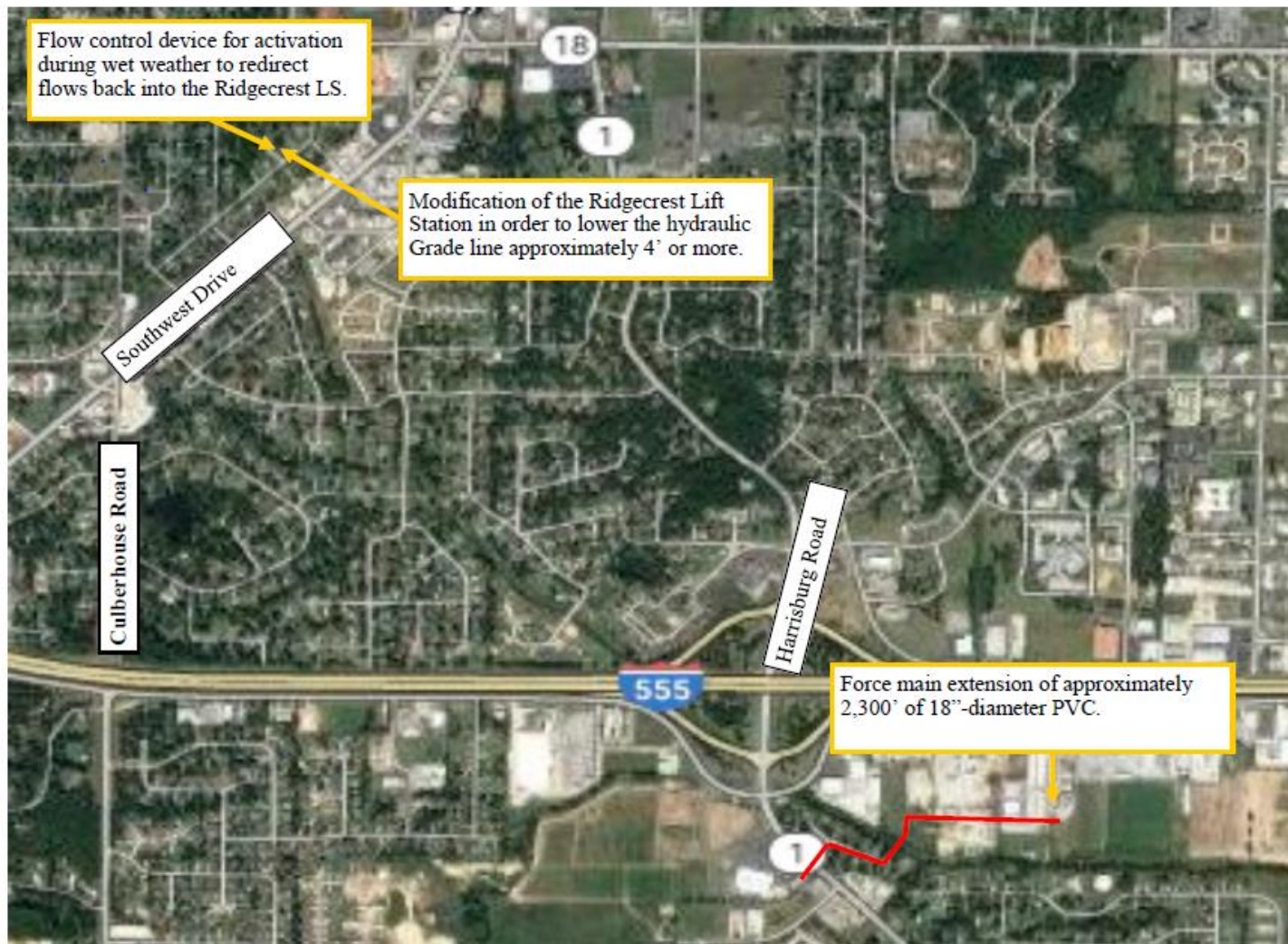


EASTSIDE WASTEWATER TREATMENT PLANT IMPROVEMENTS



Midtown Interceptor Sewer

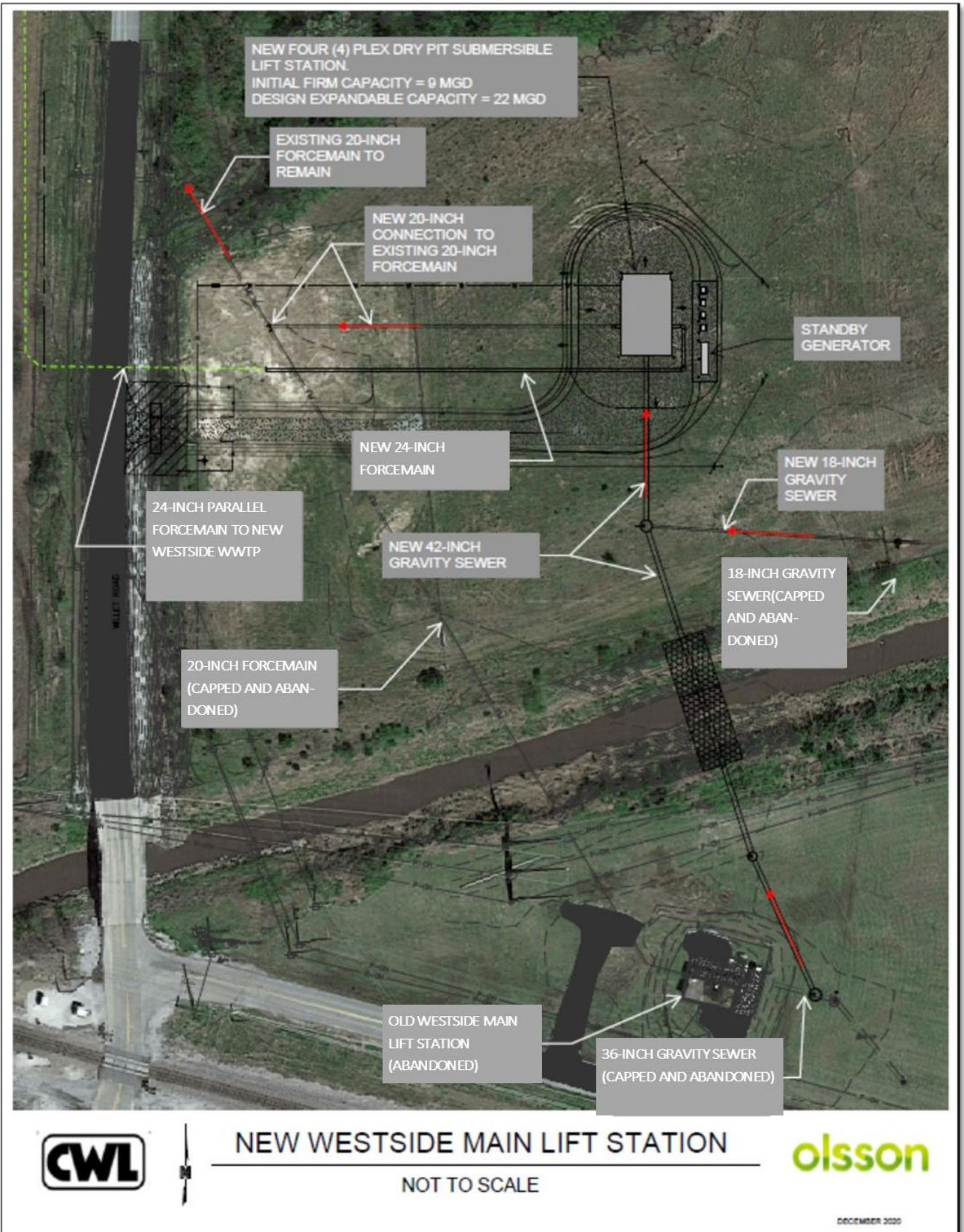




Ridgecrest Lift Station and Force Main



No Scale



Appendix E

FOG Postcard



Happy
Holidays
from CWL!



City Water & Light • 400 E. Monroe • Jonesboro, AR 72401
jonesborocwl.org • (870) 930-3380

Remember:
NEVER POUR
FAT, OIL OR
GREASE
DOWN THE
DRAIN!

City Water & Light
400 E. Monroe, P.O. Box 1289
Jonesboro, AR 72401

PRSR STD
U.S. POSTAGE
PAID
PERMIT NO. 18
JONESBORO, AR
ECRWSS

*****ECRWSEDDM****

Postal Customer



Your Toilet is NOT a Trashcan

Do Not Flush These Items



Oil & Grease (Fats)



Medicine, Needles, Bandages



Flushable Wipes, Paper Towels, Rags



Dental Floss, Teeth Whiteners



Feminine Products, Condoms



Cotton Balls, Hair, Cotton Swabs



Oil Based Hand Scrubs, Facial Tissue



Diapers, Cigarette Butts, Hairballs, Kitty Litter

DID YOU KNOW?

Dental Floss can become tangled with other trash and cause extensive damage in your plumbing and sewer mains.

DID YOU ALSO KNOW?

Paper Towels are designed to ABSORB water WITHOUT BREAKING DOWN.

BOTTOM LINE ...

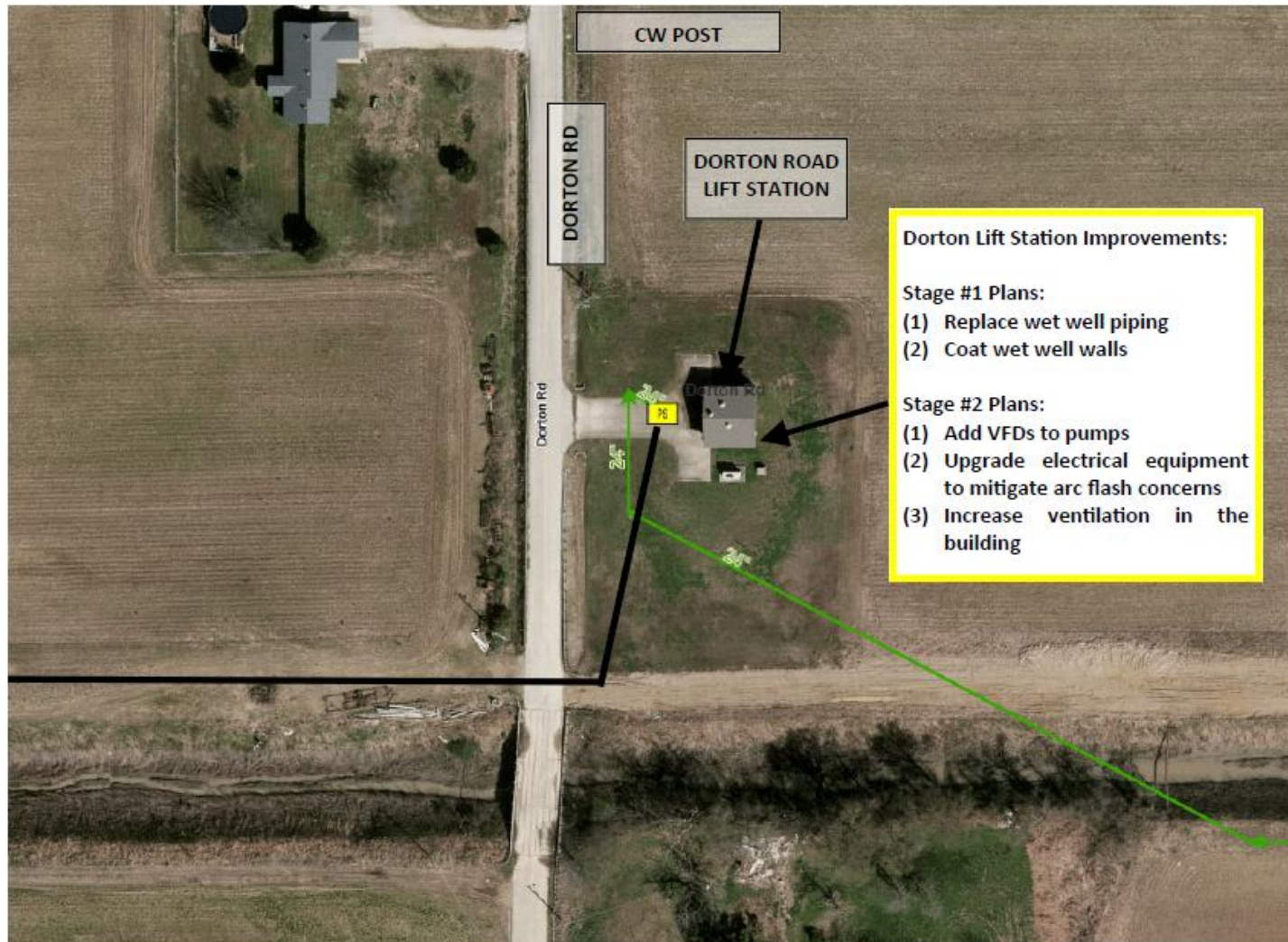
We recommend only flushing toilet paper!



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Appendix F

Dorton Road Lift Station Improvements

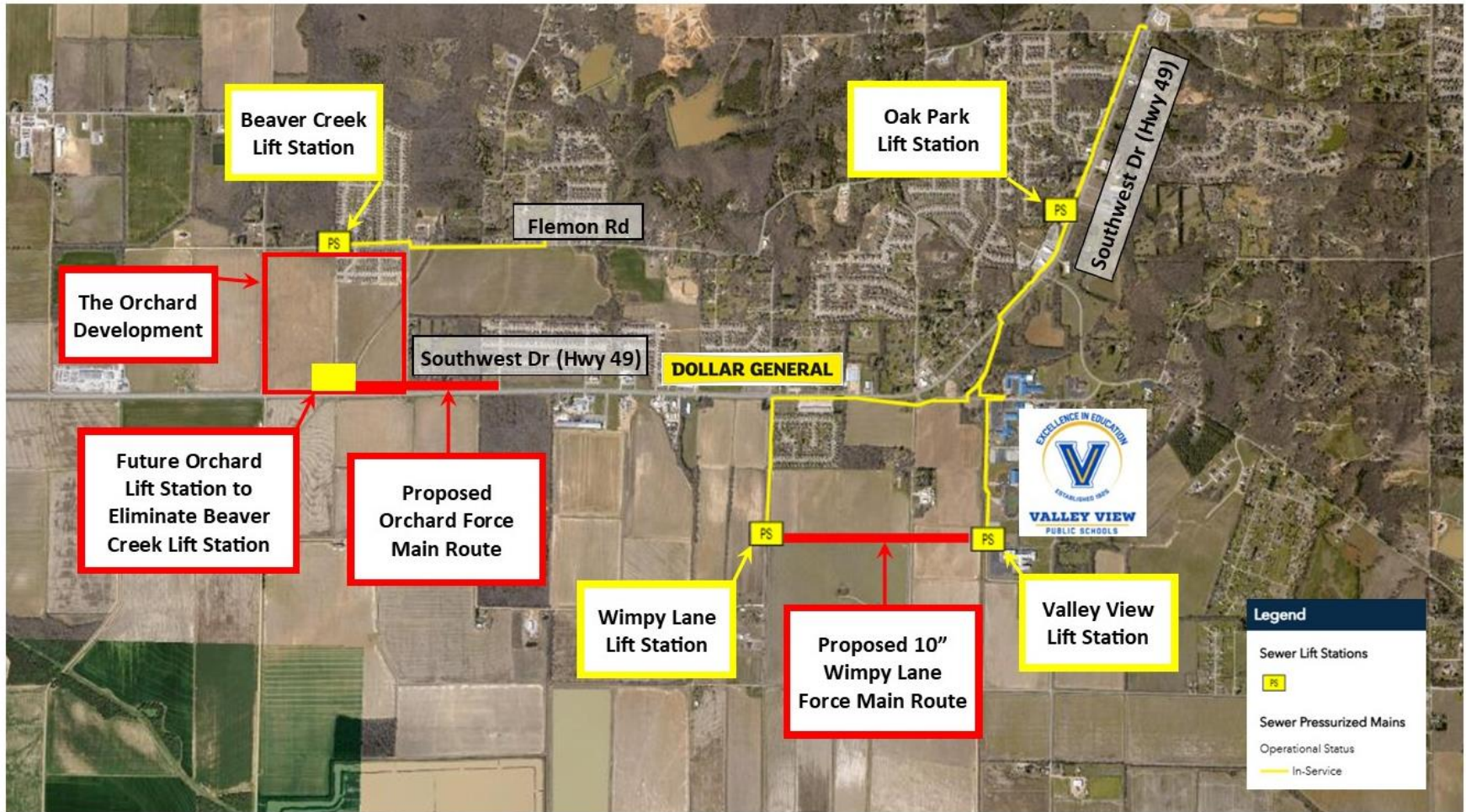


Dorton Road Lift Station



Appendix G

Wimpy Lift Station Basin Evaluation & Force Main Upgrade



Wimpy Lift Station Basin Evaluation & Force Main Upgrade

