

CITY WATER & LIGHT

JONESBORO, ARKANSAS



2025 PROGRESS REPORT

CORRECTIVE ACTION PLAN

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

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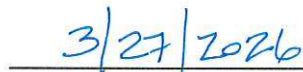
March 27, 2026

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I certify under penalty of law that this document and all appendices were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information 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.



Jake Rice III, Manager
City Water and Light
Jonesboro, AR



Date

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Acronyms

ARPA – American Rescue Plan Act

ARDOT – Arkansas Department of Transportation

BOD – Biochemical Oxygen Demand

CAP – Corrective Action Plan

CCTV – Closed Circuit Television Video

CIP – Capital Improvement Project

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

gpm – gallons per minute

I&I – Inflow and Infiltration

lbs/day – pounds per day

MGD – Million Gallons per Day

MLK – Dr. Martin Luther King Jr. Drive

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

NASSCO – National Association of Sewer Service Companies

NPDES – National Pollutant Discharge Elimination System

Olsson – Olsson, Inc.

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 2025 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.

As of December 31, 2025, 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 2025, these activities included:

- i. Progress on Phase II Capital Improvements
- ii. Performed SSES of Approximately 36 Miles of the Collection System – **Achieving Milestone of SSES of 1/3 of Collection System**
- iii. Performed Resultant Repairs for Phase I & II SSES Basins
- iv. Identification of the Gee Street Interceptor (Phase I) as a Phase III Capital Improvement Project – **Milestone #1 of Phase III**
- 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 continued its contracted CIPP lining/pipe bursting of sewer mains. The contract resulted from both maintenance and SSES activities.

CWL, for many years, has demonstrated a culture of compliance and a commitment to SSO mitigation and as outlined in this progress report, 2025 was no exception. For the period of November 1, 2024 thru December 31, 2025, CWL has documented CMOM expenses totaling over **\$4 million** and capital costs totaling over **\$5.88 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 **\$74 million** toward the Phase II capital improvement projects and estimates additional capital expenditures of approximately **\$1.2 million** to complete these Phase II efforts.

CWL is pleased to formally present the estimated **\$5.8 million** Gee Street Interceptor (Phase I) as a Phase III Capital Improvement project. Currently under design, this project is progressing ahead of the targeted milestone of December 31, 2026 for the identification of the Phase III CIPs.

As reported in 2024, CWL completed the replacement of the Westside WWTP. Formally presented as a Phase II Capital Improvement in 2020, the **\$74 million** new Westside WWTP includes **advanced nutrient removal** and was fully operational on August 7, 2024.

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 provided an offset for the overall WWTP project costs. CWL feels these actions built on the company's commitment to sewer system improvements.

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 – 2025

CWL is pleased to report the corrective actions, as presented in the following sections, achieved in 2025 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, 2024 thru December 31, 2025, CWL has documented CMOM expenses totaling over **\$4 million** and capital costs totaling over **\$5.88 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 December 31, 2025.

4. Phase II Capital Improvements

CWL is pleased to report that progress continues on the Phase II Capital Improvements. The following Sections 4.1 thru 4.2 summarize the corrective action progress accomplished both prior to and in 2025 toward efforts on this portion of Milestone #2 of Phase II. Due to complex title issues with easements for the Kitchen Interceptor – Phase I project, the targeted completion date for Phase II CIPs have been adjusted to June 30, 2027.

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. Due to long-range planning efforts, CWL has also adjusted the Sports Complex Lift Station & Force Main Upgrades to a CAP Phase III Improvement, and an update regarding the status of this project can be found in Section 8.1. The status of the adjusted Phase II improvements is summarized in Table 4-1.

Table 4-1: Phase II Capital Improvements (As of December 31, 2025)

Capital Improvement	Updated Cost Est.	Current Status
Westside WWTP Replacement	\$73 million	Complete 2024
Kitchen Interceptor – Phase I	\$1.3 million	Easement Acquisition in Progress

4.1. Westside WWTP Replacement

As previously reported, CWL began evaluating, with MW&Y (now Olsson), the Westside WWTP in 2015 to assess the adequacy of the 1977 trickling filter plant for long-term biological and hydraulic demands. In 2019, Olsson was contracted as the engineer and Van Horn as CMAR to design and construct a replacement facility to accommodate projected growth and potentially more stringent regulations. The project was designated a Phase II Capital Improvement in 2020.

In 2021, the design was expanded to include anaerobic selector and fermentation basins for improved nutrient treatment. Permits were secured by April 2022, construction began in June 2022, and the new plant began start-up on August 1, 2024, with full transition completed on August 7, 2024.

In November 2022, CWL was awarded \$5 million in ARPA funding through the Natural Resources Division of the Arkansas Department of Agriculture for the Westside Plant. This grant helped offset some of the project costs, thus providing savings to CWL's customers and aiding in CWL's dedication to SSO mitigation.

The final design, along with the replacement of the Main Lift Station, increased hydraulic capacity from approximately 7 MGD to 17 MGD and biological capacity from 6,880 to 9,950 lbs/day BOD. These upgrades support future growth, improve wet weather performance, enhance SSO mitigation in west Jonesboro, and replace aging infrastructure with a more reliable and resilient system. See Appendix A for an overhead view of the entire new facility.

4.1.1. 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. This project was completed in 2025 at a total cost of over **\$787,000**.

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; Appendix 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 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 **\$183,000** in the project to date. Several easements for the project have been completed; however, complex title work on the remaining easements has created unforeseen delays and may require condemnation to be obtained. Due to these easement complications, the project’s planned construction start date has been moved to the third quarter of 2026. See Appendix A for a map summarizing the planned Phase I improvements.

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 JB08, JB14, and JB33 to study in 2025 (App B, Basin Delineation) for an estimated total of approximately 36 miles of the sewer system. **CWL is pleased to report achieving over 40% SSES of the CWL collection system and thus meeting that portion of Milestone #2 of Phase II of CAP Addendum.** The status and results of the 2025 activities under this milestone, as of December 31, 2025, are briefly outlined in the following section.

CWL has now completed inspection, evaluation, and resultant repair identification of approximately 321 miles of the collection system under the CAP in the last 9 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 JB08, JB14, and JB33.

Table 5-1: 2025 SSES Activities (As of December 31, 2025)

Service	Quantity			
	JB 08	JB 14	JB 33	2025 Basins Total
Manhole Inspections (1)	234	255	325	814
Manhole Resultant Repairs Identified/Repaired	180/11	42/18	160/85	382/114
Line Testing and Repairs				
Smoke Test (ft) (2)	62,770	56,002	73,575	192,347
Dye Test	189	23	64	276
CCTV (ft) (3)	46,961	2,411	15,748	65,120
Mains Cleaned (ft)	55,538	1,228	20,386	77,152
Roots Cut (ft) (6)	659	0	430	1,089

Table 5-1: 2025 SSES Activities (As of December 31, 2025)

SL-Rat® (ft) (4)	48,029	60,410	48,019	156,458
Replaced/Repaired Clean Out Caps	85	37	105	227
Laterals Identified/Repaired (5)	81/25	13/2	34/18	128/45
Resultant Main Repairs Identified/Repaired	71/0	0/0	10/0	81/0

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 2025 basins included in maintenance totals reported in Table 11-1.

As in past years, CWL began the 2025 SSES activities with 100% inspection of the manholes in each of the three basins selected. As of December 31, 2025, 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 11.3 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. The CCTV inspection footage was reviewed, and CWL determined the appropriate rehab for main line defects identified and notified customers of lateral defects. All lateral defects are being coordinated through CWL's Sewer Lateral Repair Program (Section 12). Detailed smoke testing and CCTV inspection results are available upon request.

5.2. 2024 SSES Status – Final

As reported in 2024, CWL prioritized basins JB06, JB13, and JB19 (App B, Basin Delineation) to study in 2024 for an estimated total of approximately 32 miles of the sewer system. At the time of the 2024 annual report, CCTV inspection and dye testing was incomplete. These efforts were completed in late 2024 and early 2025.

The following Table 5-2 provides the final summary for the 2024 SSES activities for JB06, JB13, and JB19. Detailed reports are available upon request.

Table 5-2: 2024 SSES Activities – Evaluation Final Results (Repairs as of December 31, 2025)

Service	Quantity			
	JB 06	JB 13	JB 19	2024 Basins Total
Manhole Inspections (1)	190	307	264	761
Manhole Resultant Repairs Identified/Repaired	137/14	64/53	145/45	346/112
Line Testing and Repairs				
Smoke Test (ft) (2)	50,893	56,736	63,038	170,667
Dye Test	133	7	80	220
CCTV (ft) (3)	32,839	1,106	20,402	54,347
Mains Cleaned (ft)	36,180	2,023	35,276	73,479
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	88	35	59	182
Laterals Identified/Repaired (5)	35/7	12/10	36/14	83/31
Resultant Main Repairs Identified/Repaired	42/5	0/0	36/14	78/19

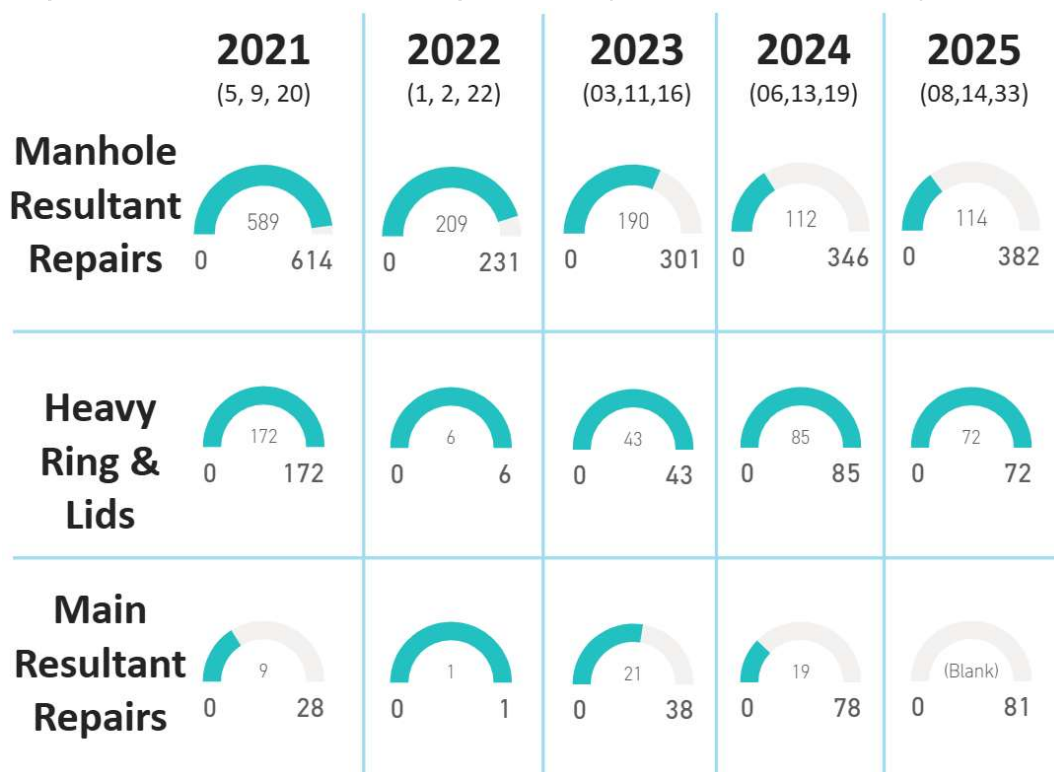
Notes:

- (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 reported in 2024 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 December 31, 2025. 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 December 31, 2025)



6.1. Manhole SSES Resultant Repairs

As presented in Section 5.1, CWL identified 382 manhole repairs in 2025. A total of 1,874 manhole resultant repairs were identified in the Phase II basins. CWL began these manhole resultant repairs in November 2022, with an additional 300 manholes repaired in 2025. Detailed spreadsheets regarding the repairs identified are available upon request and the status of repairs will be updated as applicable.

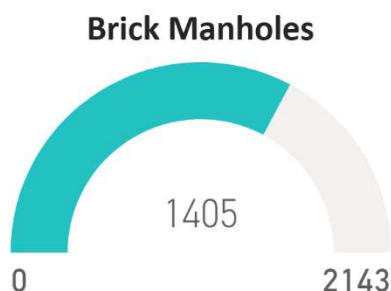
6.2. Brick Manhole Cementitious Lining Rehabilitation

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, considering the current available information, was 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 2026, CWL plans to let a contract for the cementitious lining of brick manholes identified in the 2020, 2023, and 2024 SSES basins. For the 2023 and 2024 SSES basins, only the manholes not conflicting with the current sewer main CIPP lining project (Section 11.7) will be included in this project. The remaining 2020 SSES basins' brick manholes will also be included in the project and will be lined after the associated mainline rehabilitation is complete.

For the 2025 basins, CWL has identified 269 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 December 31, 2025)



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 December 31, 2025, CWL has utilized in-house personnel to complete the replacement of 378 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 81 main line defects in the 2025 SSES basins. Appropriate repairs for the main line defects have been assigned and are underway. 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 11.7 for additional information.

7. Phase I SSES Resultant Repairs – Phase II Milestone

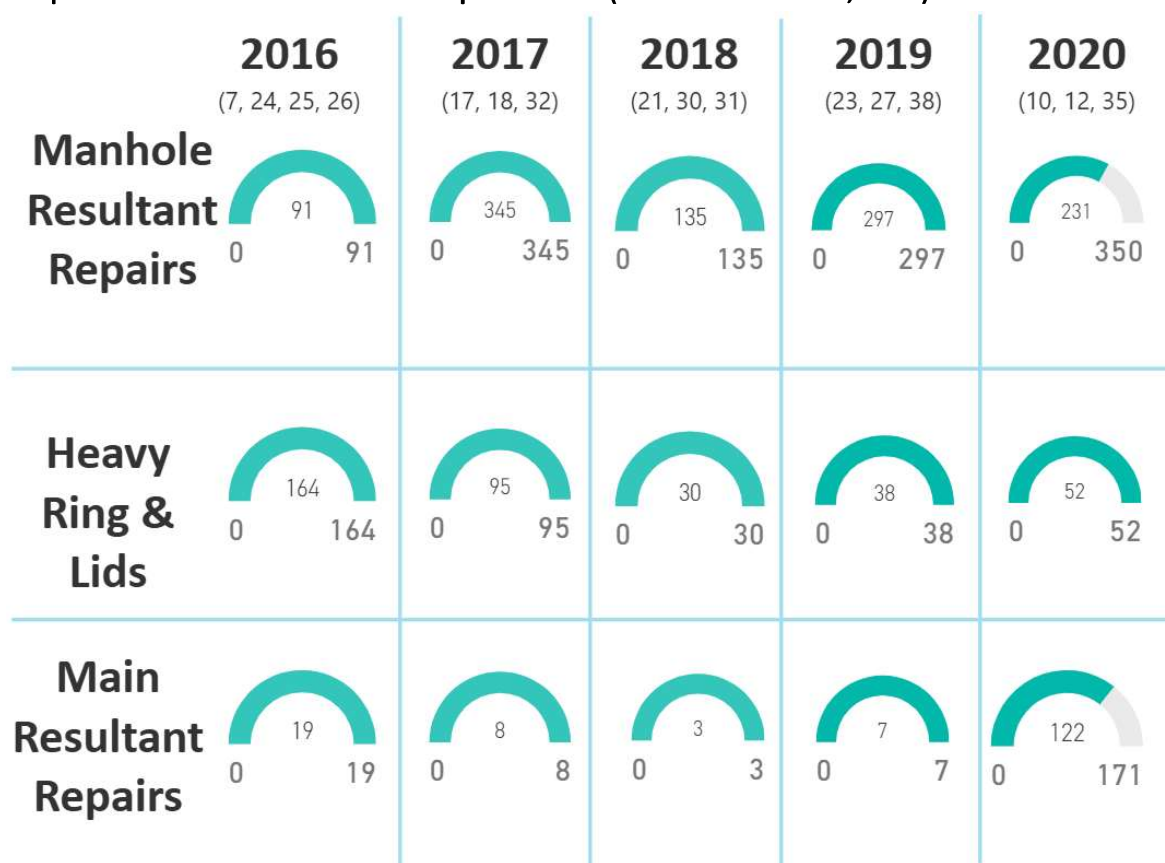
As a portion of Milestone #2 of Phase II of CAP Addendum, CWL provided an original target completion date of December 31, 2025 for achieving Phase I SSES Resultant Repairs. CWL has the remaining Phase I SSES Main Resultant Repairs contracted to be completed in 2026 (Section 11.7). The remaining Phase 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 remains at the previously adjusted date of 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 significant progress under the CAP.

The following graph summarizes the status of Phase I resultant repairs, as of December 31, 2025. The outstanding main resultant repairs are under contract (Section 11.7). The outstanding manhole resultant repairs will be under contract when the planned 2026 brick project is awarded (Section 6.2). Detailed spreadsheets regarding this information are available upon request.

Graph 7-1: Phase I SSES Resultant Repairs Status (As of December 31, 2025)



8. 2026 CAP Milestone – Phase III Capital Improvements Identified

CWL is pleased to report that Phase III Capital Improvements have been identified well before the December 31, 2026 targeted milestone. The following Sections 8.1 thru 8.2 summarize the corrective action progress accomplished both prior to and in 2025 toward efforts to identify Phase III Capital Improvements.

As stated in the CAP, CWL agrees with DEQ that mitigation efforts and associated capital improvement needs and timing are an iterative and ongoing process. With this fact in mind, CWL has adjusted the Sports Complex Upgrades, originally in Phase II (Section 4), to a Phase III Capital Improvement, as described in Section 8.1. Table 8-1 summarizes the current Phase III improvements identified.

Table 8-1: Phase III Capital Improvements (As of December 31, 2025)

Capital Improvement	Cost Est.	Current Status
Sports Complex Lift Station & Force Main Upgrades	\$1 million	In Planning
Gee Street Interceptor – Phase I	\$5.8 million	Under Design

8.1. Sports Complex Lift Station & Force Main Upgrades

Originally identified as a Phase II Capital Improvement, the Sports Complex Upgrades have been delayed by long-range planning efforts and therefore have been appropriately adjusted to a CAP Phase III improvement. 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. During the third quarter of 2025, existing pump pulleys were replaced with larger pulleys, which increased the pump flow 20-30 gpm.

Continued efforts now include assessment of the station’s potential role in long-range plans for the Valley View sewer system in southeast Jonesboro. As the Valley View design solidifies, CWL will determine any appropriate force main, pump, and/or motor upgrades for either the local sewer system or the local and additional capacity needs. See Appendix D for a map of the lift station and force main locations.

8.2. Gee Street Interceptor – Phase I

With the new Westside WWTP and Northwest (Main) Lift Station in service, CWL can now make upgrades to various existing gravity sewer networks in the Westside basins. The first being the Gee St. Interceptor – Phase I, which in 2025 CWL identified as a Phase III Capital Improvement (Milestone #1 of Phase III, 1st Quarter 2026 thru 4th Quarter 2030, in the Addendum to CWL CAP). This interceptor sewer main will improve capacity and conveyance along Gee St. directly benefiting sewer basins JB07, JB08, JB09, and JB10 (see App B, Basin Delineation).

Working with RJN in utilizing CWL's sewer hydraulic model, the current scope of work for the first phase is anticipated to include over 4,200 feet of gravity sewer, ranging in size from 42" to 36" diameter. CWL has a projected cost of approximately **\$5.8 million** for these upgrades. Like the Sports Complex Upgrades in the previous section, this project's final pipe size and start date are also contingent, in part, on current long-range planning efforts for the Valley View sewer system. See Appendix D for a map summarizing the preliminary plans for the Gee St. improvements.

9. Phase I Corrective Action Plan Activities – Summary

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. A summary of the accomplishments under this first Phase of the CWL CAP can be found in Appendix E.

10. CMOM Software – GIS & CMMS Status

As implemented under CWL's CAP and reported in previous 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 has evaluated CMMS providers in an effort to identify, procure, and implement a solution to support asset management within the organization. To that end, CWL entered into an agreement in 2024 with CDM Smith for assistance in the finalization of the CMMS RFP, selection of the CMMS provider, and implementation of the CMMS solution. CWL is pleased to report that the CMMS RFP was submitted to preselected providers on January 27, 2026, and anticipates procurement and the first stages of implementation in 2026.

CWL has invested to date over **\$566,000** toward this effort for consulting, software, and hardware, with over **\$18,000** spent in 2025.

11. Collection System Maintenance

In addition to the SSES activities of the three 2025 basins and all SSES resultant repairs outlined in previous sections, CWL performed the SSO corrective actions summarized in Table 11-1 as part of the routine inspection and maintenance of the collection system in various other areas throughout the system.

Table 11-1: 2025 Routine Collection System Maintenance (November 1, 2024 thru December 31, 2025)

Service	Quantity
	Routine Maintenance
Manhole Improvements:	
Repair/Seal Manhole	41
Adjusted Manhole	8
Replace Manhole Ring	8
Line Testing and Repairs:	
Smoke Test (ft)	0
Dye Test	24
CCTV (ft)	164,823
Main Cleaned (ft)	360,442
Grease Treated (ft)	11,379
Roots Cut (ft)	20,390
SL-Rat® (ft) (1)	1,732,269
Laterals Identified / Repaired (2)	114/104
Sewer Main Repairs:	
Point Patch	71
Other Main Repairs	5
Chemical Root Treatment (ft) (3)	62,461
CWL Point Patch Abandoned Laterals	49
Annual Inspections:	
Ditch Crossings Inspected	106
Air Relief Valves Inspected	16
Back-Lot Lines Inspected	58

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 2025 SSES basins.

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

11.1. CCTV Training & Software/Hardware

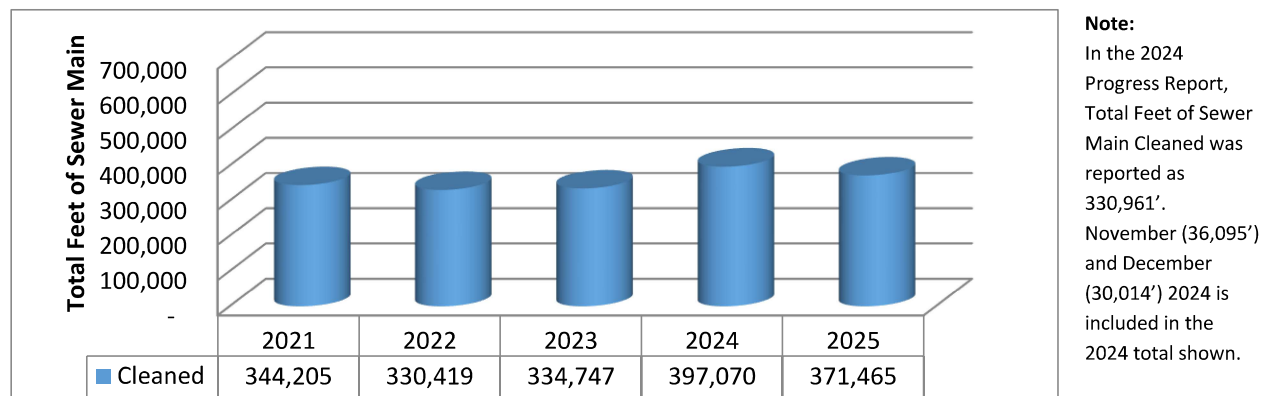
CWL understands the importance of certifying CCTV operators to code line segments utilizing the NASSCO standards. CWL employees continue to be certified through NASSCO's Pipeline Assessment Certification Program. CWL uses Phoenix software on both CCTV camera vans to

code line segments. In 2025, CWL invested over **\$19,000** on a new Orion camera head for the IBAK sewer line inspection system.

11.2. Sewer Mains Cleaned

As presented in the CAP, CWL sewer service trucks maintain the system through routine cleaning. Graph 11-1 provides a summary of the past 5 years' totals.

Graph 11-1: Sewer Mains Cleaned (2021 thru December 31, 2025)



11.3. 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 since 2016 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 SL-Rat® inspection of 12" and smaller mains in the three 2025 SSES basins, as well as in the rest of the collection system. A portion of the 12" and smaller mains that historically score low or have accessibility issues are either cleaned with the jetter or inspected through CCTV to ensure there are no blockages instead of performing an SL-Rat® inspection. Table 11-2 shows the ratings of the total line segments, including the approximately 156,458' in the 2025 SSES basin segments, tested with the SL-Rat® from November 1, 2024 thru December 31, 2025. A detailed report of the line segments tested in the 2025 SSES basins and a complete report of all line segments tested in 2025 are available upon request.

Table 11-2: SL-Rat® Sewer Line Assessment Results (November 1, 2024 thru December 31, 2025)

SL-Rat® Data for Total System	
Rating	Quantity (line segments)
10-5	7,948
4-0	905
Footage= 1,888,727	

11.4. 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. As a part of routine maintenance, CWL proactively treated approximately 14,658' of sewer mains with a chemical degreaser in 2025.

11.5. Root Control Activities

Through an existing root control contract with Duke's, approximately 62,461' of sewer mains were chemically treated in 2025. 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 2025 is available upon request.

In addition to chemical treatment, CWL 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 21,479' of sewer mains were root cut throughout the 40 basins of the system November 1, 2024 thru December 31, 2025.

11.6. Railroad Crossing CCTV Inspections

CWL conducted CCTV inspections of 6,110' of sewer line segments that intersect railroad crossings as part of its ongoing efforts to identify and mitigate defects within the sewer system. CWL is not only verifying the line segments are in good working condition but also assessing the potential impacts that the substantial weight and vibrations from rail traffic have on the rate of line degradation.

11.7. 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.

In 2022, CWL contracted Humbard Contracting Inc. (Humbard) of Green Forest, AR for CIPP lining and 6" to 8" pipe bursting. Humbard completed this contract in 2024 with approximately 6,600' of CIPP lining installed and 2,800' of sewer mains pipe burst.

As previously reported, CWL let contracts for bids on main repairs in August 2023. The scope of work included approximately 30,400' of CIPP lining and 29,300' of pipe bursting over a proposed three-year period. Humbard was awarded both contracts and began work in October 2023. As of December 31, 2025, approximately 21,700' of CIPP lining has been installed and 17,900' of sewer mains have been pipe burst. With the addition of the original contract and the two new contracts, CWL has invested over **\$5.54 million** to date. A detailed spreadsheet regarding the sewer mains identified and the rehabilitation selected for each main is available upon request.

11.8. 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 Midtown Interceptor 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 third quarter of 2026, contingent on contractor's availability. CWL has invested over **\$138,000** in this improvement to date.

11.9. Dead-End Sewer Mains Manhole Installations

As a result of performing SSSES 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 108 locations have been identified for new manholes across the sewer system, with 47 installed to date. CWL has invested over **\$523,000** in this effort. Detailed information regarding manhole locations is available upon request.

12. 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 SSSES 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. In the event an abandoned sewer lateral has been identified, CWL will verify the line is not active and point patch over it to retire the service. The following Table 12-1 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 12-1: Total Lateral Defects Identified & Current Repair Status (As of December 31, 2025)

Total	Identified	Repaired	Percent Complete
2016	94	84	89%
2017	37	36	97%
2018	58	52	90%
2019	33	27	82%
2020	168	100	60%
2021	143	106	74%
2022	66	59	89%
2023	184	159	86%
2024	182	141	77%
2025	235	143	61%
Total	1200	907	76%

13. 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 FOG outreach to public schools; development of several FOG brochures and postcards; and enhancement of FSE monitoring activities within the collection system.

Historically, CWL has inspected the 276 individual FSE grease interceptors at various intervals throughout the year (monthly, quarterly, and semi-annually). In 2025, CWL began a new formal process of inspecting the sample manhole and the downstream manhole of the 276 grease interceptors. Of the total number inspected, 56 had grease present in the downstream manhole. When grease is found during these inspections, the sewer combination truck is utilized to clean the manhole and degrease the sewer line segment. The lines are then assessed using CCTV to visually confirm that all grease has been removed. During 2025 based on findings from grease interceptor inspections and CWL's sample and downstream manhole inspections, grease treatment was performed on 9,301' of sewer line segments, and 11,168' were inspected using CCTV.

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 October 28, 2025, approximately 47,000 holiday postcards (Appendix F) were mailed.

The on-going efforts of the FOG Management Team allow 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 for 2025.

Table 13-1: FOG Management Program Activity

FOG Management Program Activity	
Activity	2025 Totals
FSE Inspections (monthly, quarterly, semi-annually)	1617
FSE FOG Samples	30
Postcards	Approx. 47,000
FSE Downstream Lines Degreased (ft)	9,301
FSE Downstream Lines CCTV (ft)	11,168
Billboards	1
Social Media	12
Television	12
Radio	2
Employee Newsletter	1
Kids Activity Books	420

Table 13-1: FOG Management Program Activity

FOG Management Program Activity	
Activity	2025 Totals
Public Outreach ¹	3
FSE Education/ Outreach	4

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

14. 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 required components, therefore, are included in the ongoing relocation/replacement of the Beaver Creek Lift Station. Begun in 2024, developer construction continues on the installation of the new Orchard Lift Station. As a project requirement, additional gravity sewer to the Beaver Creek station from the new Orchard Lift Station has been constructed, allowing for the decommissioning of the Beaver Creek station. This developer construction is nearing completion.

In 2024, CWL identified necessary improvements for the existing Southeast Lift Station. These upgrades 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. This project is in the design phase and currently planned for 2027 construction.

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 appropriately plan for additional lift station projects in conjunction with the Wimpy Lift Station evaluation and improvements, discussed in Section 14.2 and the Sports Complex Lift Station, discussed in Section 8.1.

14.1. Dorton Road Lift Station Improvements

As outlined in previous reports, CWL identified, in 2021, important improvements for the Dorton Road Lift Station (Appendix G), 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 have been completed and include:

- Installing two (2) new main breakers, two (2) termination enclosures, and four (4) VFDs and updating the automatic transfer switch, all for arc-flash mitigation and enhanced efficiency/reliability.
- Installing an exhaust fan in the wet well for increased ventilation.
- Upgrading the 2-15 hp and 2-45 hp pumps to 4-60 hp pumps.

Stage 2 began in 2022 with material procurement and was completed in the second quarter of 2025. CWL invested over **\$1 million** in these very important improvements.

14.2. 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 beyond the new Orchard Lift Station (replacing the Beaver Creek station) in the Wimpy Lane basin (Appendix H).

With the continued development in this basin, CWL contracted Crist Engineers, Inc. (Crist) in 2024 to assist in the evaluation of future growth needs and lift station design. Crist's Wastewater Masterplan for the Valley View (Southwest) Service Area is projected for completion in the second quarter of 2026. CWL has spent with Crist approximately **\$23,000** on this evaluation to date. RJN has also been engaged to assist in the Masterplan, using CWL's hydraulic model.

15. 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). As previously reported, 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 now scheduled for completion in 2026, ensuring long-term infrastructure reliability and capacity for the area.

16. Sewer Hydraulic Model

In 2014, RJN designed a hydraulic model of CWL's sanitary sewer system. As previously reported, this model allowed CWL to identify areas of interest for capital improvement projects (Sections 4, 8, & Appendix E). 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, flow metering data, and more. CWL will utilize the updated model to assist in evaluating future capital improvement projects and development inquiries. CWL has invested over **\$222,000** into this project to date.

17. 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 reached the end of their useful life and were 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 included mechanical piping improvements for a bypass arrangement which allowed Nestlé to remain operational during the screen installations. These upgrades ensure the facility will continue to adequately protect the sanitary sewer system, as well as the East WWTP, from excess food waste loading. CWL began the project in February 2024, with the assistance of Crist, and completed the installation in the third quarter of 2025. Nestlé invested approximately **\$460,000** in this project.

18. Dewatering Station

After extensive research and multiple discussions and visits with other municipalities, CWL has identified several options to enhance the safety and efficiency of dewatering and disposing of CWL's sewer combination trucks' waste from regularly cleaning and maintenance of the sewer collection system. One solution CWL is considering is the purchase of a Trash Master Auto Screen from Screenco Systems LLC. CWL has budgeted **\$300,000** for this project in 2026.

19. Conclusion

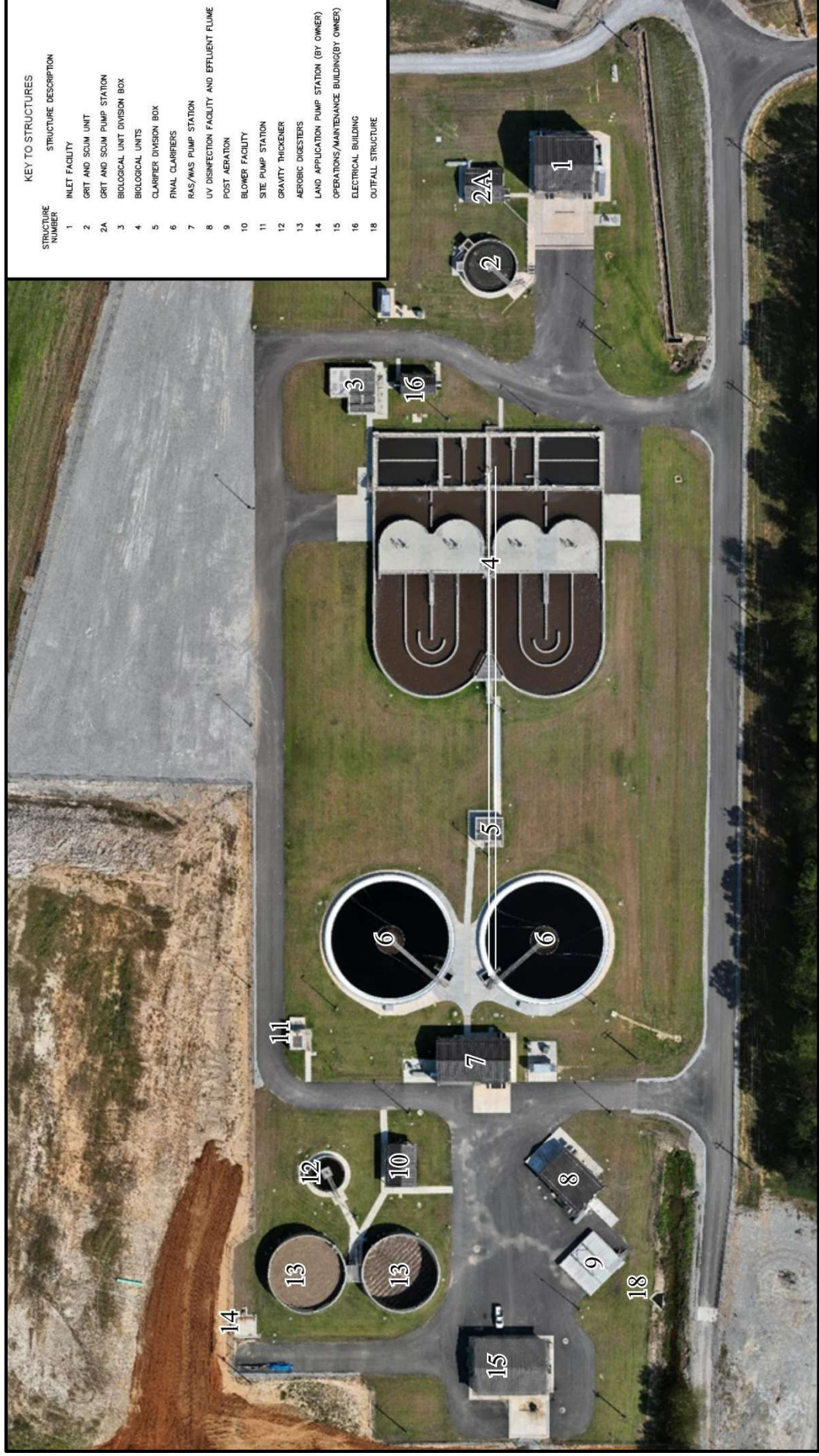
CWL is pleased to present the activities outlined in this report as evidence of CWL's ongoing efforts in SSO mitigation.

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. 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.

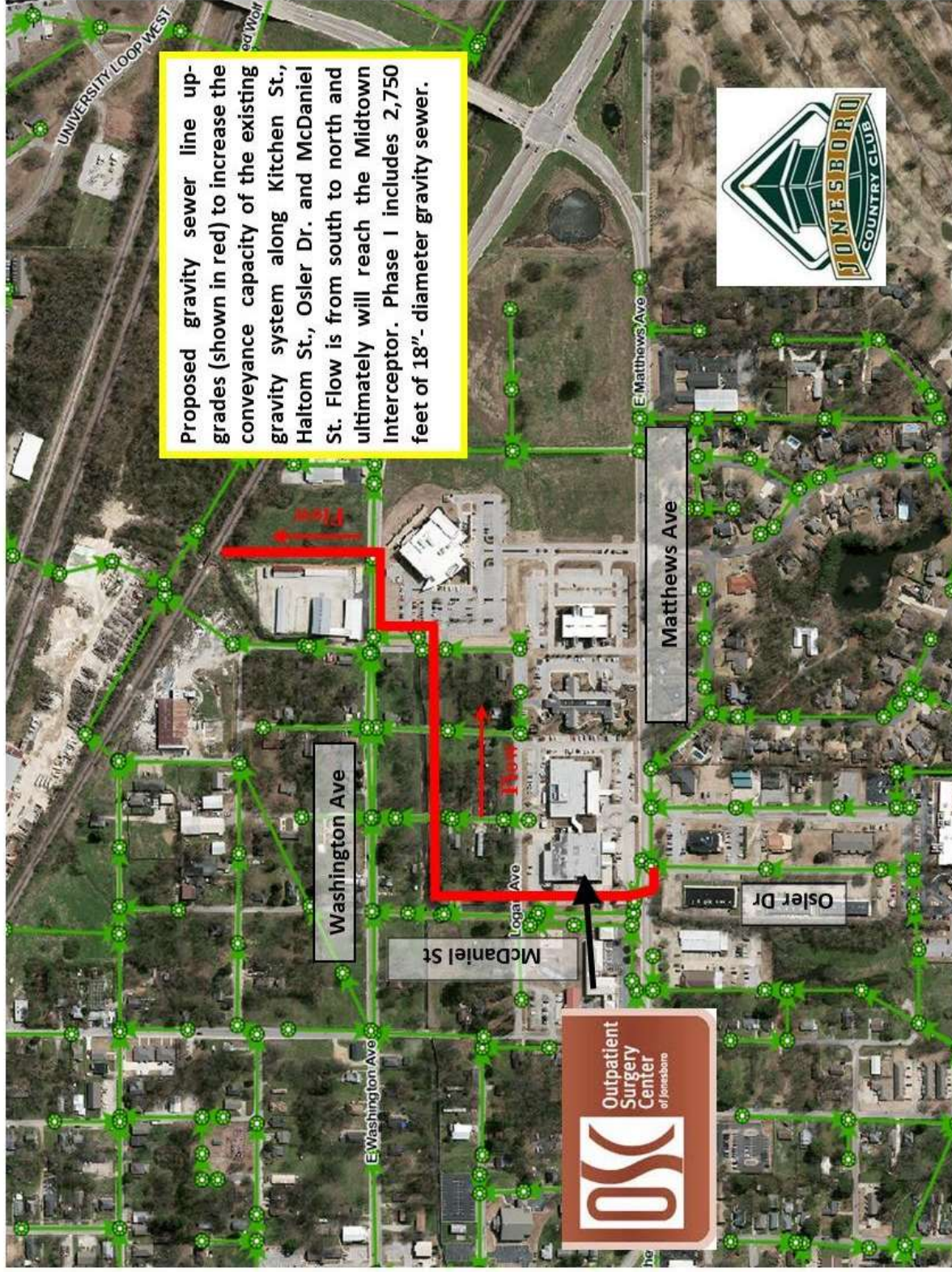
This CAP report represents CWL's fulfillment of DEQ's request for an annual progress report and constitutes CWL's sincere interest in ongoing and transparent communication with the DEQ beyond the fulfillment of our voluntary commitment of a Progress Report every two years, as presented in item IV of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

Appendix A

Phase II Capital Improvements



CWL Westside WWTP Replacement

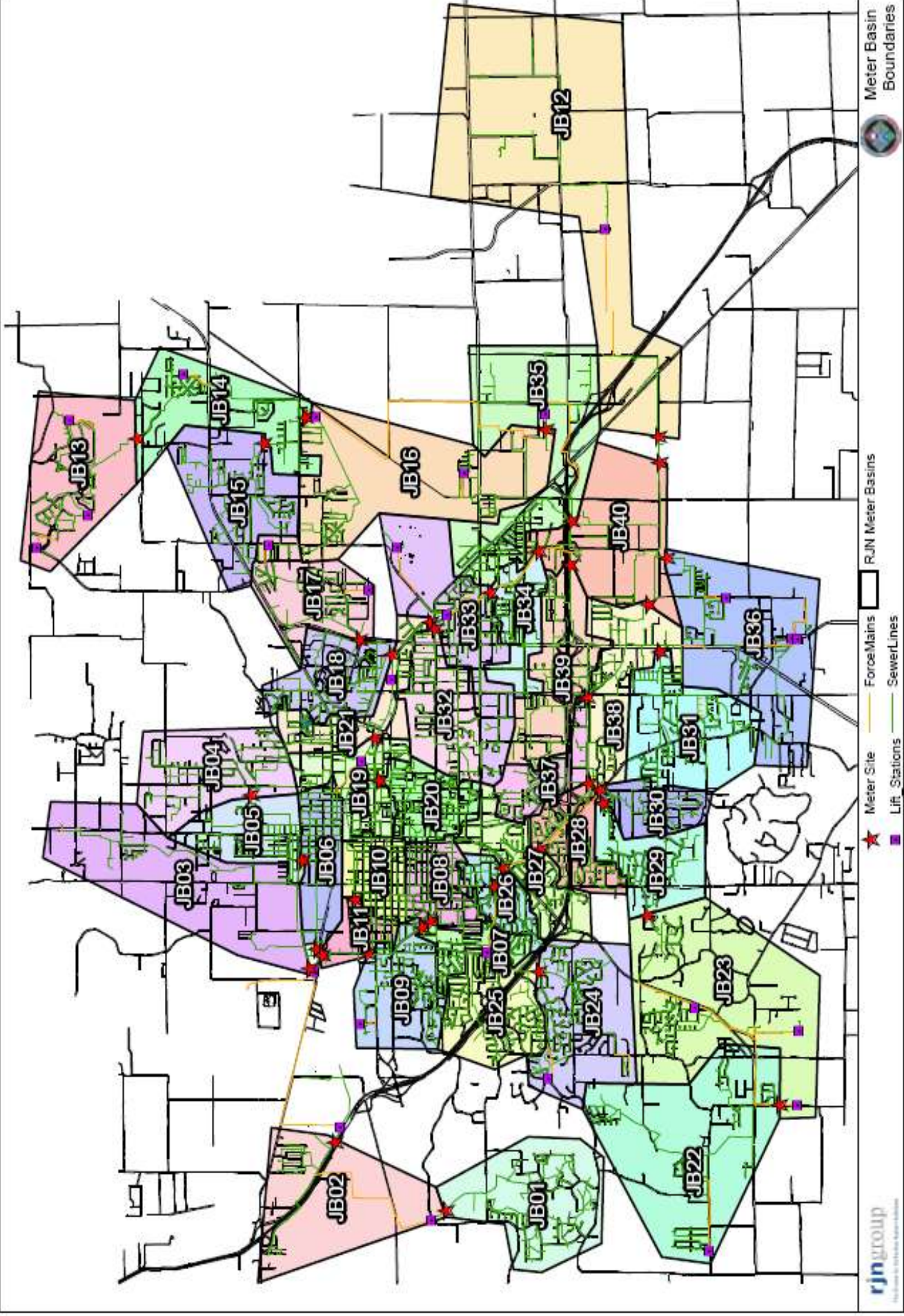


Kitchen Interceptor Phase I

Appendix B

Basin Delineation

Jonesboro, AR



Appendix C

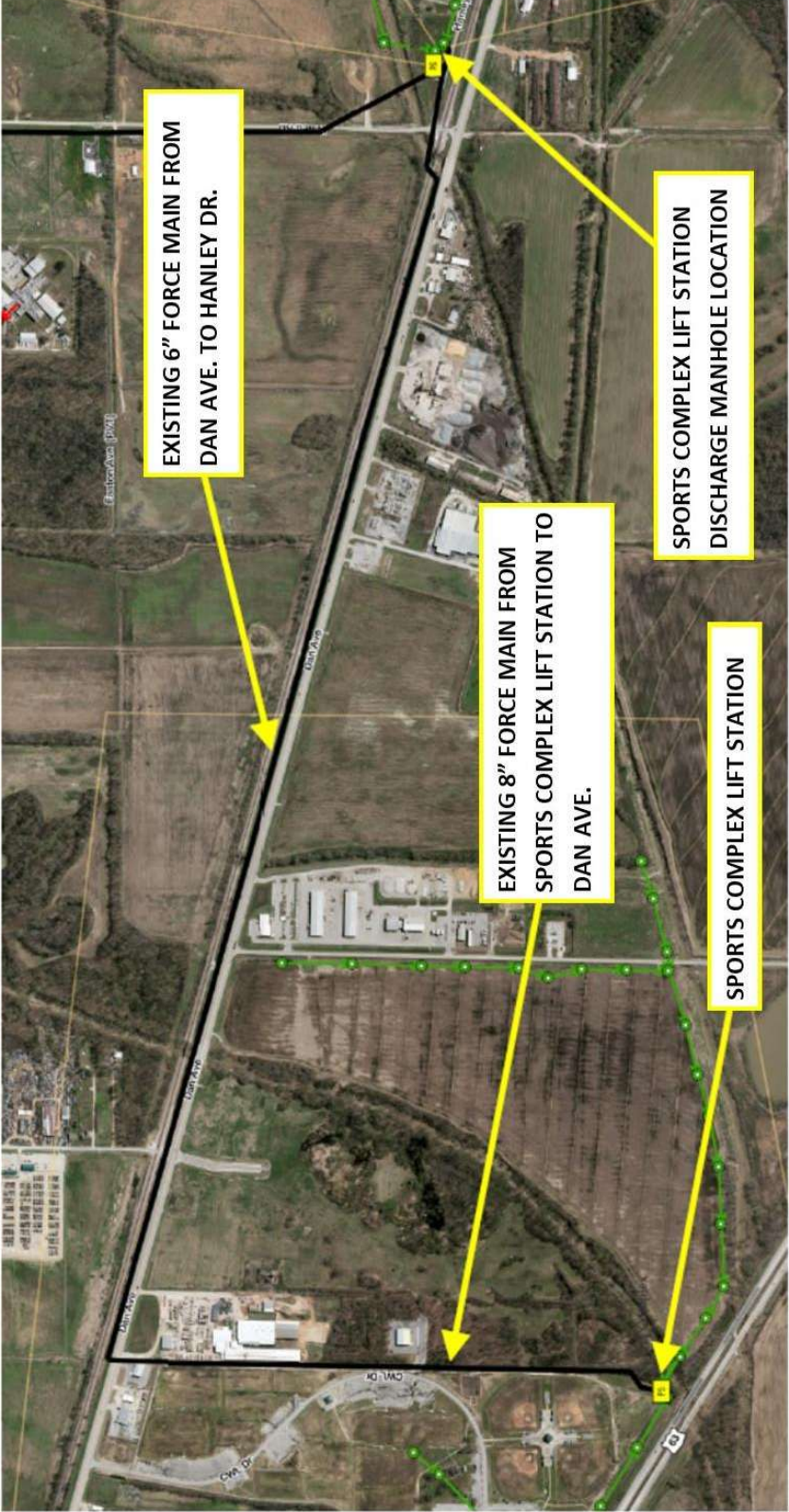
Basin SSES Status

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	2025
JB 09	2021
JB 10	2020
JB 11	2023
JB 12	2020
JB 13	2024
JB 14	2025
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	2025
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 III Capital Improvements



Sports Complex Lift Station



Gee St. Interceptor Phase I

Appendix E

Phase I Corrective Action Plan Summary

1. Finalized Phase I Capital Improvements - Summary

In the 2017 CAP Progress Report, CWL summarized four capital improvement projects as part of Phase 1 of the CAP. As provided in the 2023 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 E1-1 provides the final costs and project completion date for each improvement. In addition, see Appendix I for conceptual maps summarizing the completed improvements.

Table E1-1: Finalized Phase I Capital Improvements

Capital Improvement	Final Costs	Complete
Eastside WWTP Wet Weather Hydraulic Upgrade	\$15.06 million	2020
Midtown Interceptor	\$6.32 million	2022
Ridgecrest Lift Station & Force Main Upgrades	\$2.97 million	2023
Northwest (Main) Lift Station Replacement	\$7.82 million	2021

2. Finalized Phase I SSES Activities – Summary

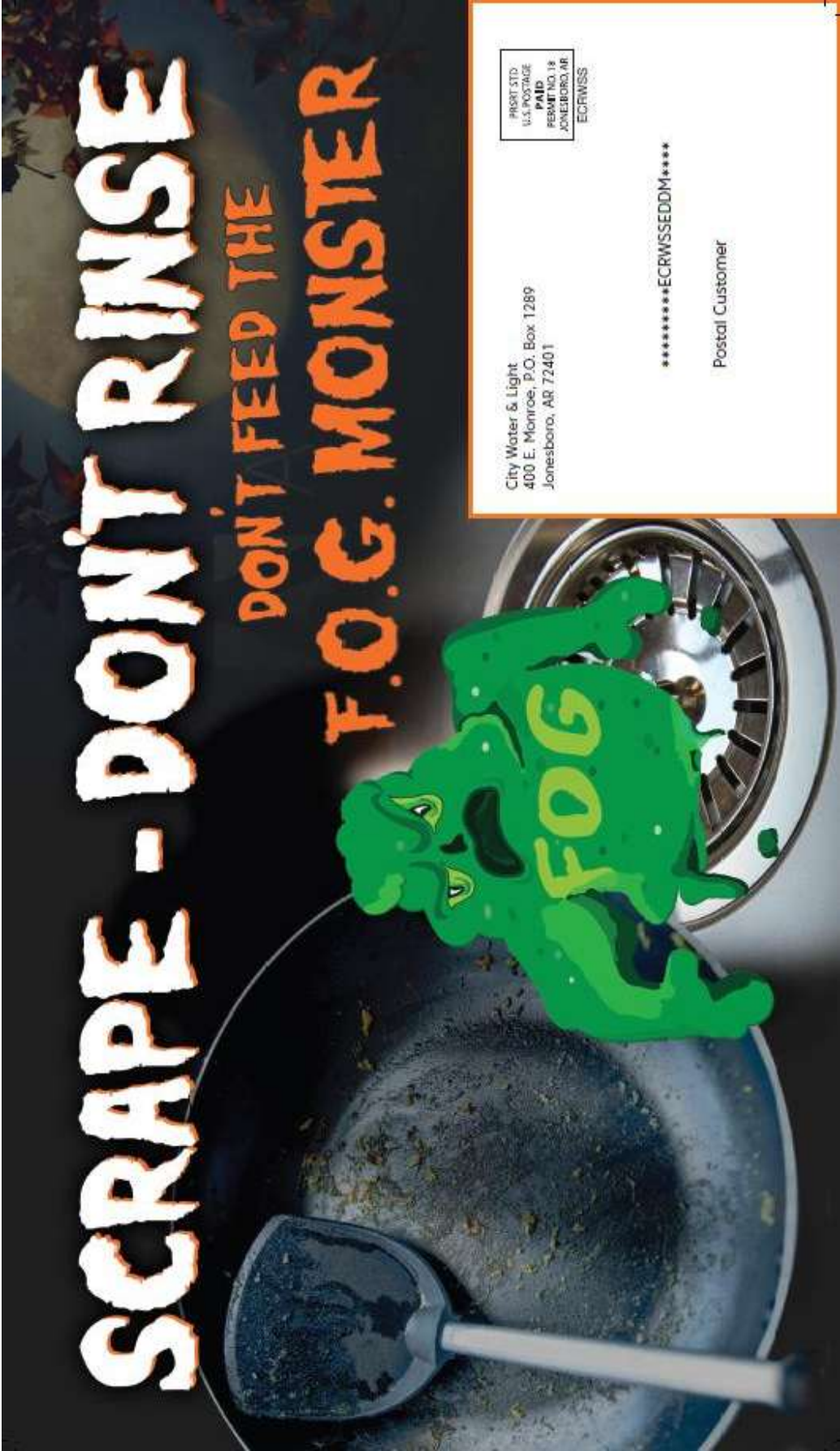
As provided in the 2021 annual report, CWL was pleased to report **achieving over 37% SSES of the CWL collection system** and thus meeting that portion of Milestone #5 of Phase I of CAP Addendum. Table E2-1 provides a summary of Phase I SSES activities and Appendix C, Basin SSES Status, provides both 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.

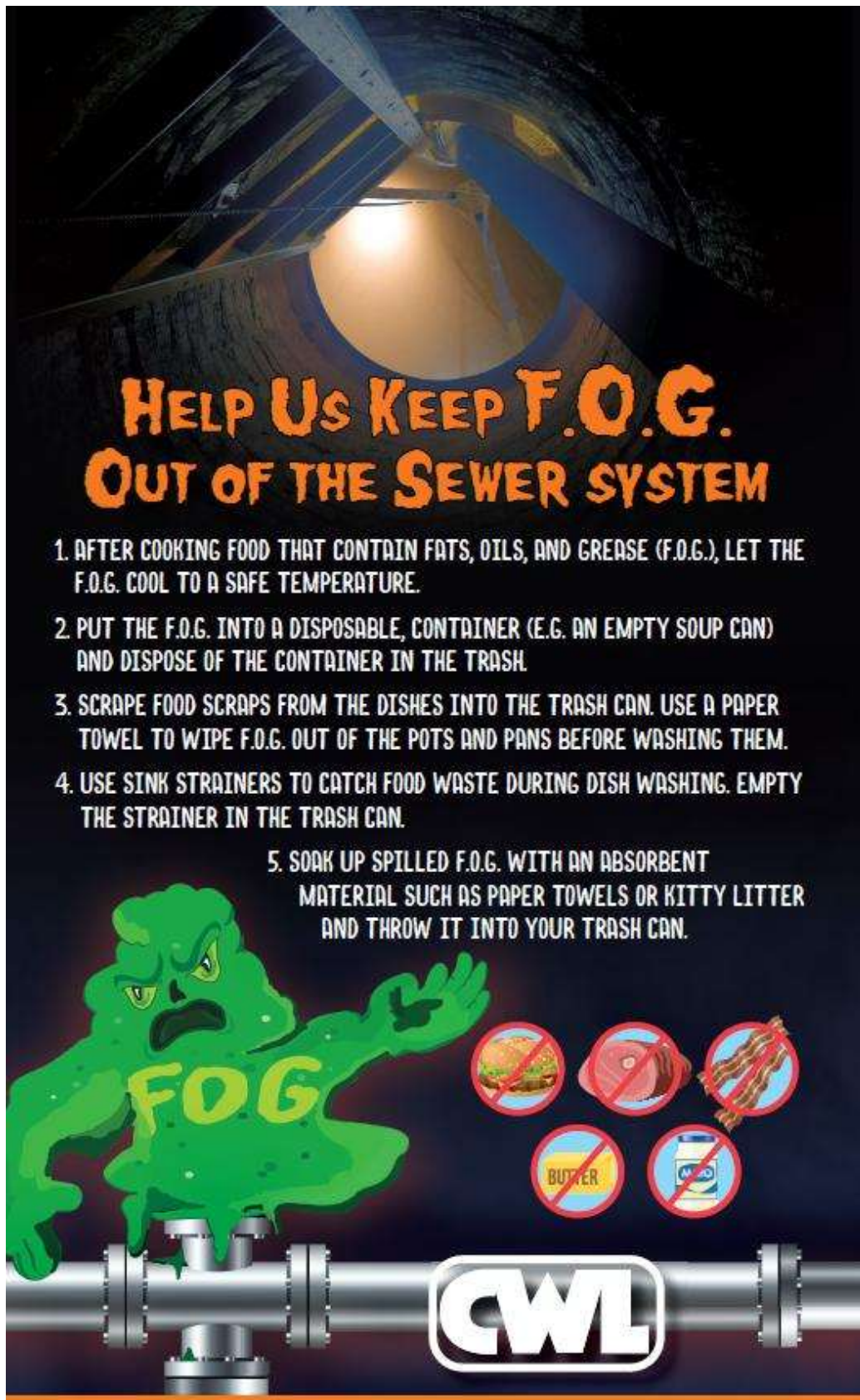
Table E2-1: Finalized Phase I SSES Activities – Summary

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

Appendix F

FOG Postcard





Appendix G

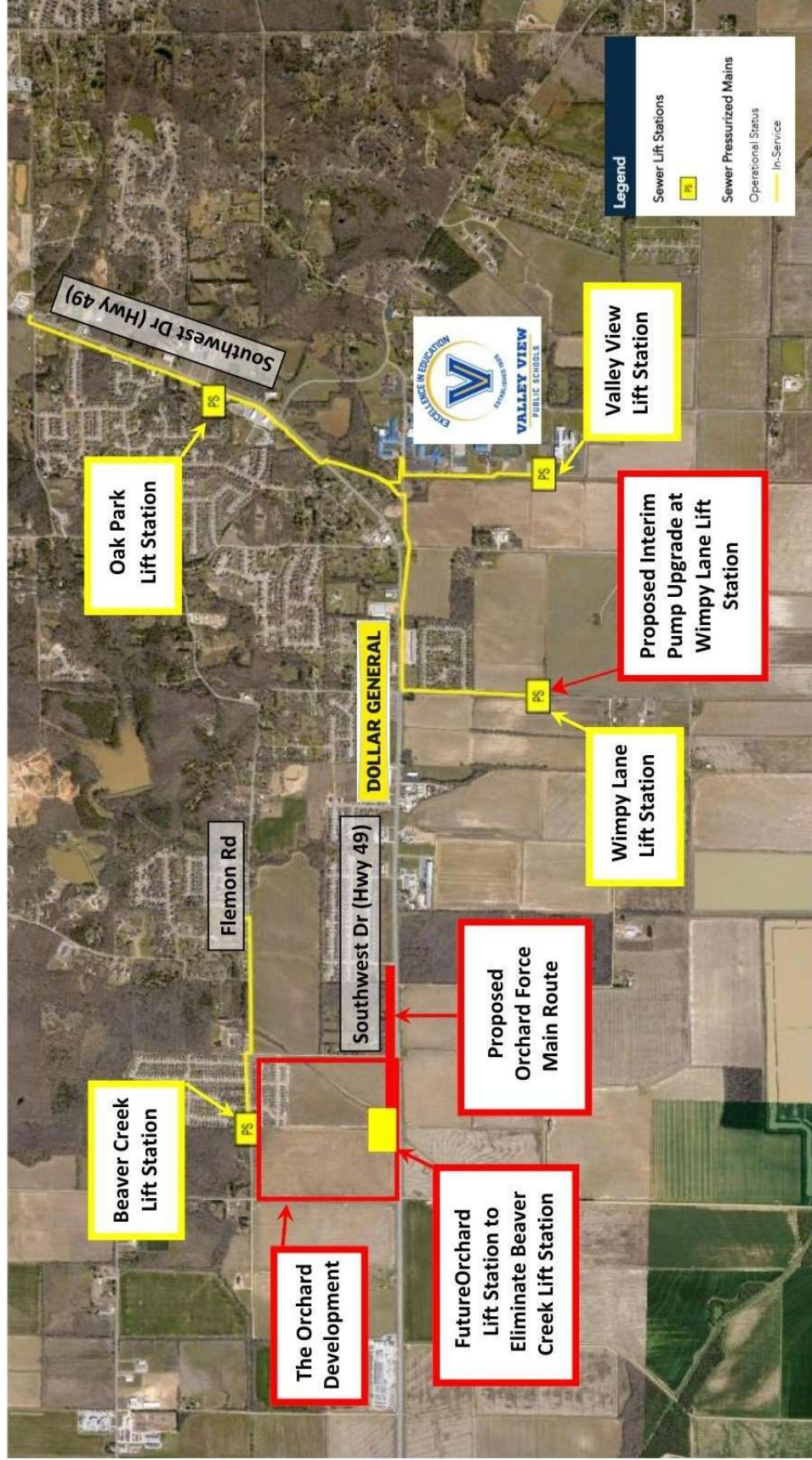
Dorton Road Lift Station Improvements



Dorton Road Lift Station

Appendix H

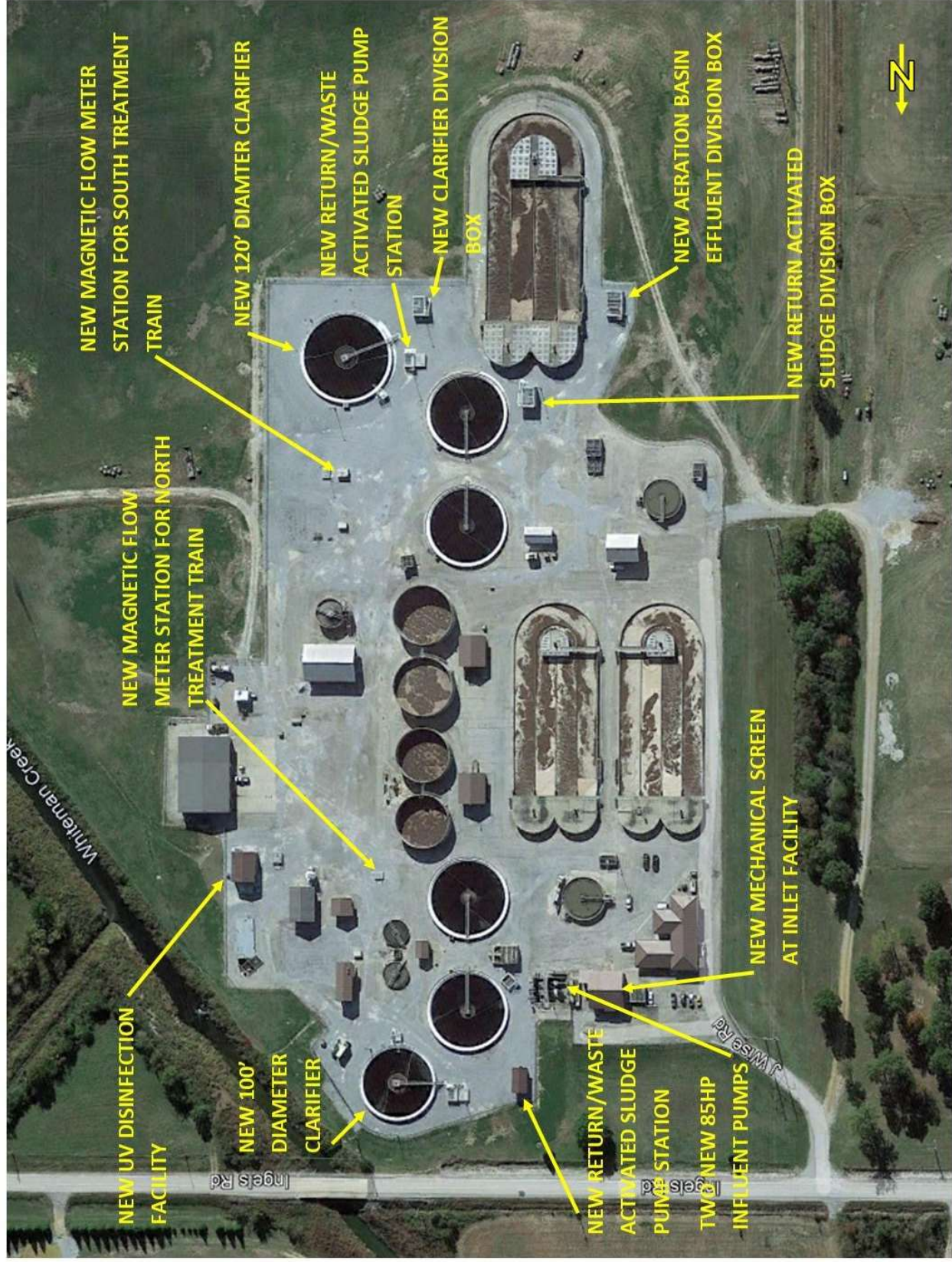
Wimpy Lift Station Basin Evaluation & Force Main Upgrade



Wimpy Lift Station Basin Evaluation & Force Main Upgrade

Appendix I

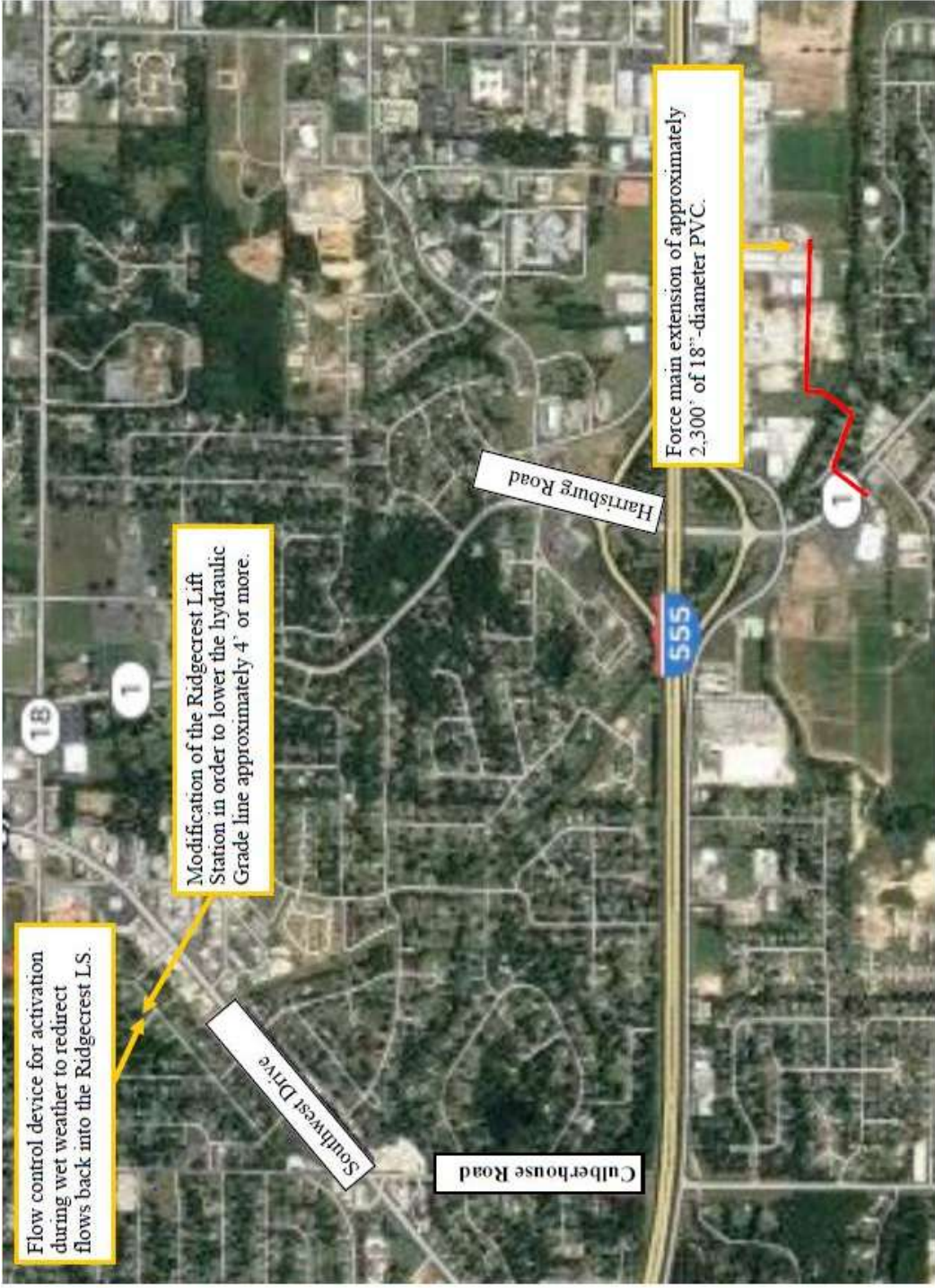
Phase I Capital Improvements



EASTSIDE WASTEWATER TREATMENT PLANT IMPROVEMENTS



Midtown Interceptor Sewer



Flow control device for activation during wet weather to redirect flows back into the Ridgecrest L.S.

Modification of the Ridgecrest Lift Station in order to lower the hydraulic Grade line approximately 4' or more.

Force main extension of approximately 2,300' of 18"-diameter PVC.



Ridgecrest Lift Station and Force Main

