To address these issues, the city has outlined the steps to remedy this situation in the action items listed in Consent Order No. EPD-WQ-5478. In fact, the completion of Action Item 1a. of that order will eliminate the overwhelming majority of these overflows. That project is scheduled to begin in June 2014 and be completed within 18-months, which is 6 months ahead of schedule. Action Item 1.b. regarding the Design Build Contract of the new Withlacoochee WPCP is expected to be awarded by the end of this month with a 18-month construction schedule as well.

The subsequent action items also listed in that order are designed to maximize the reduction of I&I related issues. Regarding areas where we have encountered failure of sewer mains resulting in emergency repairs, we have included additional work beyond the scope of the point repairs by replacing other corroded manholes and cured in place lining of existing sewer mains in the adjacent areas of those failures as well as installation of new sewer mains as necessary to eliminate any failure recurrence and reduce inflow and infiltration (I&I) into those areas of the sewer system.

Emergency Repairs at the Withlacoochee WPCP were completed earlier this spring and new operating protocols fully implemented in March 2014. Since those procedures were instituted, there have been no violations of this facility's NPDES permit with the exception of pH which resulted from exceptionally high inflow into the sanitary sewer system attributed to river flooding. That flooding was a direct result of successive abnormally high rain events on both March and April of this year causing localized flooding within the city as well as significant river flooding. These two months alone had the highest recorded rainfall in city history, receiving 17-inches of rain versus the normal 7-inches.

With regards to the sanitary sewer overflows during these rain events, the city has taken several steps to mitigate those occurrences.

- Smoke testing of the majority of these spill locations was recently completed identifying manholes and sewer lines in these areas in need of immediate attention.
- Utilizing this information, city maintained manholes and sewer lines in those areas are scheduled for lining to eliminate inflow and infiltration. In addition, letters have been sent to property owners notifying them of damaged service connections contributing to the I&I problems.
- As previously mentioned, in locations where emergency repairs are underway, additional scope
  has been added to those jobs to replace or line sewer mains in the adjacent areas to those point
  repairs. These projects will total well over \$2 million when completed.
- Bids for lining and in some situations raising an additional 38 manholes to reduce 1&1 are due
  May 21, 2014. To date over 90 manholes have been lined or replaced and seven have been
  raised because of the location adjacent to the storm water collection system. A list of an
  additional 30 plus manholes is being developed for bid advertisement late this summer.