SEWER OVERFLOW ACTION PLAN UNAUTHORIZED DISCHARGE TRACKING AND REPORTING PLAN

- In 2008, from January 1 through December 31, there were a total of 163 unauthorized discharges from the gravity system mains, sewer force mains and sewer pumping stations. The Board complied with the 24-hour response time goal set out in the Sewer Overflow Action Plan, as modified by the *force majeure* relief, for all of these discharges.

- The Board is using the "Key to Measures Taken in Response to Unauthorized Discharges" in order to identify control measures taken by the Board, permitting the Board to accurately document field activities pertaining to the clean up and disinfection of discharge sites.

- The Board is not seeking further modifications of the Sewer Overflow Action Plan.

PREVENTIVE MAINTENANCE PLAN

- The Board has complied with the requirements in the Preventive Maintenance Program for sanitary sewer collection system line inspections, sanitary sewer collection system line cleaning, sanitary sewer collection system manhole inspections, sanitary sewer collection system repairs, air release valve inspection and maintenance, force main isolation valve exercise and inspection, force main alignment inspection, and cathodic protection system surveys.

- Post-Katrina, the Board sought and was granted *force majeure* for Sewer Pump Station Preventive Maintenance. The Board will begin performing Sewer Pump Station Preventive Maintenance as Sewer Pump Stations, damaged during Hurricane Katrina, are fully repaired.

Sanitary Sewer Collection System Line Inspection

- Requirement: Inspect at least 9% of the system each year and 100% in 8 years.
- Total System Amount: 6,043,493.8 feet (as of 12/31/2008)

  - 2008 Completion: 900,274.9 feet
  - Annual Percent Compliance: 14.9%
  - Cumulative (6/23/1998 to 06/22/2009*) Percent Compliance: 6,023,536.1 feet (99.67%)

    * The dates shown in this cycle reflect the cycle extension request approved by the Department of Justice in its letter dated January 25, 2008. (Refer to Appendix 9)

- Modification Request: The Board is not requesting modifications to the Preventive Maintenance Plan.

Sanitary Sewer Collection System Line Cleaning

- Requirement: Clean at least 7% of the system each year and 100% in 10 years.
- Total System Amount: 6,043,493.8 feet (as of 12/31/2008)

  - 2008 Completion: 1,077,480.4 feet
  - Annual Percent Compliance: 17.8%
  - Cumulative (6/23/1998 to 6/22/08) Percent Compliance: 6,117,397.7 feet (101.22*)
  - System lines are often removed or added to the system. Therefore, the amount of cumulative completion appears to be over 100%.
  - The Board has met the requirement to clean 100% of the system in ten years for the cycle 6/23/1998 – 6/22/2008.
  - Cumulative (6/23/08 to 6/22/18) Percent Compliance: 455,722 feet (7.54%)

- Modification Request: The Board is not requesting further modifications at this time to the Preventive Maintenance Plan.

Sanitary Sewer Collection System Manhole Inspections

- Requirement: Inspect at least 25% of all sewer manholes each year and 100% in 3.3 years.
- Total System Amount: 23,060 manholes (as of 12/31/2008)

  - 2008 Completion: 8,946 manholes
  - Annual Percent Compliance: 38.8%
  - Cumulative for Cycle (2/19/05 to 8/17/09*) Percent Compliance: 22,087 (95.8%).

    * The dates shown in this cycle reflect the cycle extension request approved by the Department of Justice in its letter dated January 25, 2008. (Refer to Appendix 9)

- Modification Request: The Board is not requesting further modifications at this time to the Preventive Maintenance Plan.

Sanitary Sewer Collection System Repairs

- Requirement: Report all Sanitary System Repairs

  - 2008 Completion: 457 reportable repairs (as of 12/31/2008)
  - Percent Compliance: 100%

- Modification Request: The Board is not requesting further modifications at this time to the Preventive Maintenance Plan.

Sewage Pump Station Preventive Maintenance

- Requirement: Complete 90% of all preventive maintenance tasks within two weeks of the scheduled date for completion.

  - Total System Amount: N/A (as of 12/31/2008)
  - 2008 Completion: 0
  - Percent Compliance: 0%

- Due to Hurricane Katrina, the Board was unable to meet the 90% requirement of the sewage pumping station preventive maintenance tasks.

- The Board has been granted *force majeure* protection for preventive maintenance on pump stations through December 31, 2008, and into 2009.

- The Board has not been able to return to the pre-Katrina Preventive Maintenance Program outlined in Exhibit 3 of the Consent Decree. However, the Board continues to perform regular maintenance on all units powered by commercial power. In addition, portable pumps that are under contract are maintained by the vendor.

- Modification Request: The Board is not requesting further modifications at this time to the Preventive Maintenance Plan.

Air Release Valve Inspection and Maintenance

- Requirement: Perform semi-annual inspection maintenance.

  - **First Half, 2008**
    Total System Amount: 21 known air release valves
    2008 Completion: 21 inspected
    Percent Compliance: 100%

  - **Second Half, 2008**
    Total System Amount: 21 known air release valves
    (See Total System Amount Note Below)
    2008 Completion: 21 inspected
    Percent Compliance: 100%

  - **Total System Amount Note:**
    On November 19, 2008 the Board accepted Contract #3819, which added 10 air release valves to the system. These additional air release valves were exercised/inspected as part of the final acceptance of the contract.

- Modification Request: The Board is not requesting further modifications at this time to the Preventive Maintenance Plan relating to Air Release Valve Inspection and Maintenance.

Force Main Isolation Valve Exercise and Inspection

- Requirement: Inspect and exercise annually, after the completion of the first inspection cycle, for which two years is allowed.

  - Total System Amount: 156 force main isolation valves as of December 31, 2008.
  - 2008 Completion: 156 force main isolation valves inspected and exercised.
  - Percent Compliance: 100%

  - Modification Request: The Board is requesting further modifications at this time to the Preventive Maintenance Plan relating to the number of Force Main Isolation Valves. Please refer to Section V of this document for the specific change requests.

Force Main Alignment Inspections

- Requirement: Visually inspect annually.

  - Total System Amount: Approximately 102 miles (as of 12/31/2008)
    (See Total System Amount Note Below)
  - 2008 Completion: Approximately 102 miles
  - Percent Compliance: 100%

- **Total System Amount Note:**
  On November 19, 2008 the Board accepted Contract #3819, which added approximately 1 mile to the force main system.

- Modification Request: The Board is requesting modifications to the Preventive Maintenance Plan relating to Force Main Alignment Inspections. Please refer to Section V of this document for the specific change requests.

Cathodic Protection System Surveys

- Requirement: Conduct cathodic protection surveys annually.

  - Total Number of East Bank Test Sites: 20 (as of 12/31/2008)
  - 2008 Completion: 20 sites surveyed
  - Percent Compliance: 100%

- Modification Request: The Board is not requesting modifications at this time to the Preventive Maintenance Plan.

STORM SEWER MONITORING PLAN

2008:

- Phase I of the Storm Sewer Monitoring Program was completed on March 8, 2000. On January 19, 2001, a tabulation of sampling for Phase I was submitted to the EPA as required.

- Phase II of the Storm Sewer Monitoring Program will commence within 180 days of completion of the Remedial Measures Action Plan (RMAP) for all sewerage basins that are within the drainage system pumping station basins that are required to be sampled although the original completion dates will be changed. The work in the sewage basins was scheduled to be completed no later than December 31, 2006. The parties are currently negotiating a new completion date, yet to be determined.

Consent Decree Accomplishments

During 2008, the following actions occurred under Consent Decree – Civil Action No. 93-3212. All Consent Decree accomplishments are listed in Appendix E of this report.

Paragraph 25

Request Modification of the PM Program

District:	Citywide
Scheduled Date:	03/01/08
Actual Date:	02/29/08

Paragraph 26

Compliance with the EPA-Approved PM Program Modifications

District:	Citywide
Scheduled Date:	06/24/08
Actual Date:	03/27/08

Paragraph 44

Resume Construction: Mid City

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A, B, C, D
Scheduled Date:	11/15/08
Actual Date:	08/18/08

Resume Construction: Ninth Ward

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	D&E
Scheduled Date:	11/15/08
Actual Date:	08/21/08

Resume Construction: Carrollton

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A & B
Scheduled Date:	11/15/08
Actual Date:	08/29/08

Consent Decree Accomplishments

Paragraph 45

Set 33% / 66% Milestones: Contract 3647 (Mid City)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A, B, C, D, E
Scheduled Date:	N/A
Actual Date:	09/09/08

Set 33% / 66% Milestones: Contract 3647 (Ninth)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	D & E
Scheduled Date:	N/A
Actual Date:	09/09/08

Set 33% / 66% Milestones: Contract 3647 (Carrollton)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A & B
Scheduled Date:	N/A
Actual Date:	09/09/08

33% Completion: Contract 3647 (Mid City)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A, B, C, D, E
Scheduled Date:	10/16/08
Actual Date:	09/19/08

66% Completion: Contract 3647 (Mid City)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A, B, C, D, E
Scheduled Date:	11/18/08
Actual Date:	09/26/08

33% Completion: Contract 3647 (Ninth Ward)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	D & E
Scheduled Date:	10/24/08
Actual Date:	10/10/08

Consent Decree Accomplishments

33% Completion: Contract 3647 (Carrollton)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A & B
Scheduled Date:	10/24/08
Actual Date:	11/05/08

66% Completion: Contract 3647 (Carrollton)

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A & B
Scheduled Date:	01/09/09
Actual Date:	11/21/08

Paragraph 61

4th Quarter Consent Decree Report

District:	Citywide
Scheduled Date:	02/01/08
Actual Date:	01/30/08

1st Quarter Consent Decree Report

District:	Citywide
Scheduled Date:	05/01/08
Actual Date:	04/30/08

2nd Quarter Consent Decree Report

District:	Citywide
Scheduled Date:	08/01/08
Actual Date:	07/30/08

3rd Quarter Consent Decree Report

District:	Citywide
Scheduled Date:	11/01/08
Actual Date:	10/31/08

Consent Decree Accomplishments

Paragraph 62

2007 Annual Consent Decree Report
District: Citywide
Scheduled Date: 03/01/08
Actual Date: 02/29/08

Paragraph 65

Milestone Completion Report: Resume Construction- Mid-City
Contract 3647 Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District: A, B, C, D
Scheduled Date: 09/08/08
Actual Date: 08/28/08

Milestone Completion Report: Resume Construction- Ninth Ward
Contract 3647 Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District: D & E
Scheduled Date: 09/11/08
Actual Date: 08/28/08

Milestone Completion Report: 33% Mid-City Contract Completion
Contract 3647 Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District: A, B, C, D
Scheduled Date: 10/10/08
Actual Date: 10/06/08

Milestone Completion Report: Resume Construction- Carrollton
Contract 3647 Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District: A & B
Scheduled Date: 10/20/08
Actual Date: 10/07/08

Milestone Completion Report: 66% Mid-City Contract Completion
Contract 3647 Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District: A, B, C, D
Scheduled Date: 10/17/08
Actual Date: 10/14/08

Consent Decree Accomplishments

Milestone Completion Report: 33% Ninth Ward Contract Completion

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	D & E
Scheduled Date:	10/31/08
Actual Date:	10/14/08

Milestone Completion Report: 33% Carrollton Contract Completion

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A & B
Scheduled Date:	11/14/08
Actual Date:	11/10/08

Milestone Completion Report: 66% Carrollton Contract Completion

Contract 3647	Manhole to Manhole Sanitary Sewer Main Replacements at Various Locations throughout Orleans Parish
District:	A & B
Scheduled Date:	12/12/08
Actual Date:	12/05/08