

Office of the Mayor  
Chokwe Lumumba, Mayor



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January 29, 2014

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

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

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

RE: City of Jackson  
EPA Consent Decree  
Supplemental Environmental Project  
Semi Annual Report #2  
July 2013 through December 2013

Dear Gentlemen:

Attached, please find the Semi Annual Report #2 of the Supplemental Environmental Project for the period of July 2013 through December 2013. The report was developed and submitted by the City of Jackson in accordance with the EPA Consent Decree dated March 1, 2013 and your correspondence of May 31, 2013.

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

Sincerely,

Chokwe Lumumba, Mayor  
City of Jackson Mississippi

Cc: Les Herrington, P.E., Mississippi Department of Environmental Quality  
Gail Lowery, City Attorney, City of Jackson  
Willie Bell, Interim Public Works Director, City of Jackson  
Mary D. Carter, Public Works Deputy Director, City of Jackson  
Terry Williamson, Legal Counsel, City of Jackson  
Public Depository, Eudora Welty Public Library

## Supplemental Environmental Project

Semi Annual Report #2

July 2013 through December 2013

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

### **Significant milestones reached this period for this activity:**

- **Submitted copy of the executed Escrow Agreement to EPA**
- **Submitted escrow deposit verification to EPA**
- **Continued development of scopes of work, fee schedule, forms, and contracts to be used in implementation of the SEP**
- **Continued development of financial hardship qualifications for eligibility for the SEP**

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

- **Complete development of scopes of work, fee schedule, forms, and contracts to be used in implementation of the SEP**
- **Complete development of financial hardship qualifications for eligibility for the SEP**
- **Begin development of list of Plumbers**
- **Begin development of information management system**
- **Notify public of Private Service Lateral Program**
- **Begin determinations of eligible property owners**

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

ID	Task Name	Duration	Start	Finish	2014											
					Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun
0	<b>Supplemental Environmental Project</b>	<b>2347 days</b>	<b>Fri 3/1/13</b>	<b>Mon 2/28/22</b>												
1	Consent Decree Entered	1 day	Fri 3/1/13	Fri 3/1/13												
2	Develop scope of work, fee schedule, forms, and contracts	174 days	Tue 10/1/13	Fri 5/30/14												
3	Develop list of Plumbers	110 days	Mon 6/2/14	Fri 10/31/14												
4	Develop Information Management System	176 days	Mon 3/3/14	Mon 11/3/14												
5	Develop financial hardship qualifications	151 days	Mon 9/2/13	Mon 3/31/14												
6	Notify property owners of the program	44 days	Tue 4/1/14	Fri 5/30/14												
7	Determine eligible property owners	87 days	Mon 6/2/14	Tue 9/30/14												
8	Notify eligible property owners in target area	108 days	Wed 10/1/14	Fri 2/27/15												
9	Private Lateral Replacement	1762 days	Mon 3/2/15	Tue 11/30/21												
10	Private Lateral Replacement ( 50% Completion )	0 days	Thu 2/28/19	Thu 2/28/19												
11	Final Completion Report	64 days	Wed 12/1/21	Mon 2/28/22												
12	<b>Escrow Deposits</b>	<b>1831 days</b>	<b>Mon 8/26/13</b>	<b>Mon 8/31/20</b>												
21	<b>Semi Annual Reports</b>	<b>2092 days</b>	<b>Thu 7/25/13</b>	<b>Fri 7/30/21</b>												