CITY OF MERIDIAN

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FEBRUARY 28, 2026

Case No. 3:19-cv-00427-DPJ-FKB

EES Case Management Unit
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
Re: DOJ No. 90-5-1-1-11167

Chief, NPDES Permitting and Enforcement Branch
Water Protection Division
U.S. Environmental Protection Agency, Region 4
ATTN: Mr. John C. Goodwin
61 Forsyth Street, S.W.
Atlanta, GA 30303

Chief, Environmental Compliance and Enforcement Division
Office of Pollution Control
Mississippi Department of Environmental Quality
P.O. Box 2261
Jackson, MS 39225-2261

Re: City of Meridian, Mississippi – EPA Consent Decree
Annual Report No. 6

Dear Ladies and Gentlemen:

Please find enclosed the City of Meridian's Annual Report No. 6, as required in Section IX of the Consent Decree. Should you have any questions, please contact me.

Sincerely,

David M. Hodge, P.E., Director
Public Works Department
City of Meridian

Enclosure
Cc: Honorable Percy Bland III, Mayor
David M. Ruhl, P.E., RPG, Program Manager, Waggoner Engineering Inc.

CITY OF MERIDIAN

Public Works Department

Wastewater System Consent Decree

Meridian, Mississippi

Annual Report No. 6

February 28, 2026

311 27th Avenue, Meridian, MS 39301

P: 601.485.1920 | F: 601.485.1864

City of Meridian
Wastewater Consent Decree Program

Annual Report No. 6
January 2025 through December 2025

February 28, 2026

Prepared for:

City of Meridian
Department of Public Works
311 27th Ave.
Meridian, MS 39301

Prepared by:

Waggoner Engineering, Inc.
2211 5th Street, Suite 107
Meridian, MS 39301

CITY OF MERIDIAN
Public Works Department

City of Meridian, Mississippi
Annual Report No. 6
January 2025 through December 2025

CITY OF MERIDIAN

Public Works Department

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 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 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.

Percy Bland III, Mayor
City of Meridian

2/24/26
Date

Annual Report No. 6
January 2025 through December 2025

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1.0 Introduction

The Meridian Consent Decree requires the development and submittal of reports to demonstrate continuing compliance with the US Environmental Protection Agency, the US Department of Justice, and the Mississippi Department of Environmental Quality. The Consent Decree outlines standard requirements for work in Meridian Wastewater Consent Decree projects and includes the requirements for project deliverables that will provide consistency and uniformity in execution of the work.

1.1 Overview

On August 6th, 2019, the City of Meridian, Mississippi (City) entered into a Consent Decree (CD) with the United States Environmental Protection Agency (EPA), the State of Mississippi Department of Environmental Quality (MDEQ) and the United States Department of Justice (USDOJ) to address deficiencies within the City's wastewater collection and transmission system (WCTS), with the goal of eliminating sanitary sewer overflows (SSOs) and achieving continued compliance, in full, with the Clean Water Act (CWA), the Mississippi Air and Water Pollution Control Act (MAWPCL) and the National Pollution Discharge Elimination System (NPDES) Permit.

One of the ongoing requirements of the EPA Consent Decree is to submit periodic reports to demonstrate continuing compliance. This report covers the reporting period from January 2025 to December 2025. The specific reporting requirements of the CD are described below.

1.2 Authority to Promulgate

The City retained Waggoner Engineering, Inc., Neel-Schaffer, Inc. and Kimley-Horn and Associates, Inc. to assist the City in addressing the requirements of the Consent Decree. Accordingly, Waggoner Engineering, Inc. prepared this Annual Report with input from the City and its various contractors to fulfill the requirements of Section IX ¶ 26 (b) set forth in the CD.

1.3 Consent Decree Requirements for Annual Report

As stated in the Consent Decree Section IX ¶ 26 (b), the Annual Report shall be submitted beginning two (2) Months after the first full Calendar Year following the Effective Date of this Consent Decree, and two (2) Months after each subsequent Calendar Year until termination of the Consent Decree, the City shall submit to EPA for review and approval an Annual Report. Each Annual Report shall cover the most recent applicable Calendar Year and shall include, at a minimum:

1) *A summary of the CMOM Programs implemented or modified pursuant to this Consent Decree, including a comparison of actual performance with any performance measures that have been established.*

2) *A trends analysis of the number, volume, duration, and cause of the City's SSOs for the previous two Calendar Years updated to reflect the SSOs that occurred during the previous twelve (12)-Month period except that the first Annual Report shall only include the first twelve (12) Months.*

2.0 Summary of Sanitary Sewer Overflows

The City has developed a multi-phased Sewer System Evaluation and Rehabilitation (SSER). The program to evaluate and rehabilitate their existing Wastewater Collection and Transmission System (WCTS) as required under the Consent Decree.

The SSER program approach focuses on prioritizing the assessment, analysis, and rehabilitation of the WCTS infrastructure by identifying structural defects, capacity issues, and other conditions associated with infiltration and inflow (I/I) that result in wet weather capacity related sanitary sewer overflows (SSOs).

The primary objective of the Consent Decree is elimination of SSOs within the WCTS. The Consent Decree defines an SSO as, "any discharge of wastewater to waters of the United States or the State from the City's Sewer System through a point source not specified in any NPDES permit, as well as any overflow, spill, or release of wastewater to public or private property from the Sewer System.

2.1 Sanitary Sewer Overflows

As defined in the Consent Decree, a "Sanitary Sewer Overflow" or "SSO" shall mean any discharge of wastewater to waters of the United States or the State from the City's Sewer System through a point source not specified in any NPDES permit, as well as any overflow, spill, or release of wastewater to public or private property from the Sewer System that may not have reached waters of the United States or the State, including all Building Backups.

In 2025, the City of Meridian recorded 25 SSOs, reflecting approximately a 46% reduction compared to the 46 overflows reported in 2024, and a continued improvement from the 63 SSOs documented in 2023.

Table 2.1 lists "Sanitary Sewer Overflows" in the system from January 2025 through December 2025.

The City experienced a total of 25 SSOs from January 2025 through December 2025 with an estimated total duration of 1,876 hours and an estimated total volume of approximately 6.8 million gallons.

Figure 2-1 illustrates "Number of Sanitary Sewer Overflows, Rainfall and Volume" by month from January 2023 through December 2025.

Rainfall remained a primary factor influencing the occurrence of SSOs in 2025, with approximately 47.75 inches recorded during the year. Although total annual rainfall was slightly lower than the 57.50 inches recorded in 2024, rainfall-related inflow and infiltration (I/I) continued to contribute to the majority of overflow events by frequency.

However, the highest overflow volumes recorded in 2025 were associated with extended-duration infrastructure failures, including a grease blockage and a sewer line cave-in. While

rainfall was present during portions of those events, it was not the primary cause of the discharge volumes.

Figure 2-2 lists "Volume from Sanitary Sewer Overflows and Rainfall" by month from January 2024 through December 2025.

Although the total number of SSOs decreased significantly in 2025 compared to 2024, the total estimated overflow volume increased due to the prolonged duration of isolated structural failures early in the year. This demonstrates that while mitigation efforts continue to reduce overflow frequency, individual infrastructure failures can disproportionately impact annual discharge totals.

Figure 2-3 lists "Duration of Sanitary Sewer Overflows and Rainfall" by month in the system from January 2024 through December 2025.

Figure 2-4 lists "Causes of Sanitary Sewer Overflows" in the system from January 2024 through December 2025.

As in previous years, excessive rainfall remained the dominant cause of SSOs by frequency in 2025, exacerbating infiltration and inflow (I/I) into the system. Other causes included grease blockages, cave-ins, and broken pipes. These non-rainfall structural failures accounted for a smaller number of total events but contributed significantly to annual volume totals.

Figure 2-5 lists "Locations of Sanitary Sewer Overflows" in the system that occurred more than once from January 2025 through December 2025.

During 2025, there were 25 SSOs at multiple locations throughout the system. The SSO 7 (181 65th Ave.) location continued to experience recurring rainfall-related overflows and accounted for the highest number of events during the year. Additional repeat activity occurred at the Highway 45 East WWTP location.

Overall, 2025 reflects continued progress in reducing the frequency of sanitary sewer overflows, while also highlighting the impact that localized infrastructure failures can have on annual overflow duration and volume totals.

Table 2.1
Sanitary Sewer Overflows Reported
Annual Report No. 6 - January 2025 through December 2025

COUNT	SSO #	SOURCE	START	END	DURATION (Minutes)	GALLONS	IMPACTED WATERS	CAUSE	RAINFALL	BASIN ID	BASIN GROUP
1	7	SMH-E25-037	1/10/25 11:30 AM	1/10/25 3:40 PM	160	24,000	Okatibbee Creek	Rain	3.96”	K-5	1
2	5000 Hwy 39 (The Crossings)	SMH-J33-004	1/16/25 10:00 AM	1/23/25 3:00 PM	10380	519,000	Sowashee Creek	Roots	.90”	B-3	3
3	7	SMH-E25-037	1/18/25 4:30 AM	1/18/25 12:45 PM	455	34,125	Okatibbee Creek	Rain	.84”	K-5	1
4	HWY 45 East WWTP	SMH-J31-041	1/18/25 1:30 PM	1/18/25 8:40 PM	430	32,250	Sowashee Creek	Rain	.84”	B-1	3
5	7	SMH-E25-037	1/26/25 11:55 PM	1/27/25 8:25 PM	1,230	153,750	Okatibbee Creek	Rain	2.05”	K-5	1
6	HWY 45 East WWTP	SMH-J31-041	1/27/25 8:02 AM	1/27/25 6:20 PM	618	61,800	Sowashee Creek	Rain	2.05”	B-1	3
7	7	SMH-E25-037	2/12/25 11:05 AM	2/13/25 1:55 PM	645	112,875	Okatibbee Creek	Rain	2.32”	K-5	1
8	7	SMH-E25-037	3/15/25 5:30 PM	3/16/25 12:35 AM	425	63,750	Okatibbee Creek	Rain	2.01”	K-5	1
9	22nd Ave., N. Frontage Rd.	SMH-I25-051	3/19/25 3:00 PM	3/20/25 9:50 AM	1130	169,500	Sowashee Creek	Blockage	0”	B-4	3
10	4700 26th Ave.	SMH—H33-217	2/24/25 8:00 AM	3/27/25 10:00 AM	41,820	2,091,000	Gallaghar Creek	Cave-in	0”	J-4	2

Table 2.1
Sanitary Sewer Overflows Reported
Annual Report No. 6 - January 2025 through December 2025

11	29th Avenue	SMH-H32-004	2/24/25 8:00 AM	3/27/25 10:00 AM	41,820	2,091,000	Gallaghar Creek	Blockage	0”	J-4	2
12	1313 65th Ave.	SMH-E27-011	3/26/25 8:00 AM	3/26/25 3:00 PM	420	42,000	Okatibbee Creek	Manhole	O”	K-5	1
13	22nd Ave., N. Frontage Rd.	SMH-I25-051	3/31/25 10:00 AM	4/2/25 10:00 PM	2160	108,000	Sowashee Creek	Rain	1.08”	B-4	3
14	SSO 7	SMH-E25-037	4/6/25 8:20 AM	4/6/25 4:15 PM	475	106,875	Okatibbee Creek	Rain	2.15”	K-5	1
15	SSO 7	SMH-E25-037	4/23/25 3:05 PM	4/23/25 10:15 PM	430	64,500	Okatibbee Creek	Rain	2.98” (NAS)	K-5	1
16	SSO 7	SMH-E25-037	5/7/25 2:05 AM	5/7/25 8:30 AM	345	51,750	Okatibbee Creek	Rain	1.89”	K-5	1
17	HWY 45 East WWTP	SMH-J31-041	5/7/25 9:00 AM	5/8/25 7:00 AM	1,320	13,200	Sowashee Creek	Rain	1.89”	B-1	3
18	SSO 7	SMH-E25-037	5/26/25 6:05 PM	5/26/25 10:30 PM	230	34,000	Okatibbee Creek	Rain	2.07”	K-5	1
19	SSO 7	SMH-E25-037	5/27/25 8:15 AM	5/29/25 8:30 PM	2,930	439,500	Okatibbee Creek	Rain	2.08”	K-5	1
20	Plum Point (45th St., 32nd Pl.	SMH-G32-141	06/23/25 2: 00 PM	06/25/25 2:00 PM	2800	432,000	Gallagher Creek	Blockage	0”	J-4	2
21	SSO 5	SMH-H25-061	8/28/25 12:45 PM	8/28/25 2:20 PM	95	9,500	Sowashee Creek	Rain	1.99”	B-8	1

Table 2.1
Sanitary Sewer Overflows Reported
Annual Report No. 6 - January 2025 through December 2025

22	SSO 5	SMH-H25-061	10/26/25 11:35 AM	10/26/25 12:50 PM	75	7,500	Sowashee Creek	Rain	3.00”	B-8	1
23	SSO 7	SMH-E25-037	10/26/25 1:30 PM	10/26/25 2:35 PM	65	6,500	Okatibbee Creek	Rain	3.00”	K-5	1
24	31st Ave. and 23rd St.	SMH-H29-001	12/1/25 8:00 AM	12/2/25 12:00 PM	1680	126000	Shearers Branch	Broken Pipe	0”	I-1	2
25	2012 Highway 39	SGM-I28-093	12/15/25 7:00 AM	12/15/25 2:30 PM	450	45000	Robbins Branch	Broken Pipe	0”	C-1	3

Figure 2-1
Number of Sanitary Sewer Overflow, Rainfall and Volume
January 2024 through December 2025
Annual Report No. 6

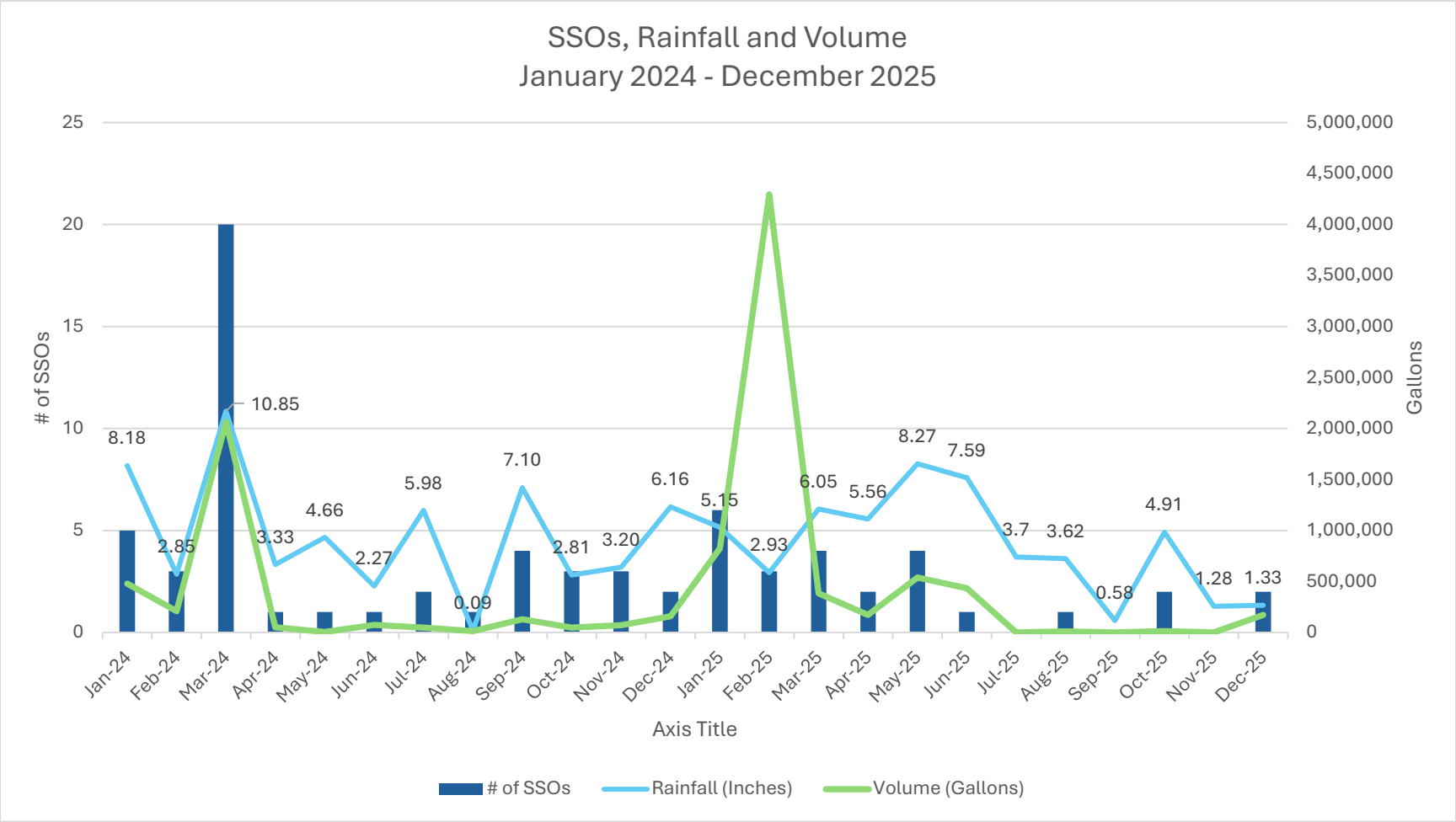


Figure 2-2
Volume from Sanitary Sewer Overflows and Rainfall
January 2024 through December 2025
Annual Report No. 6

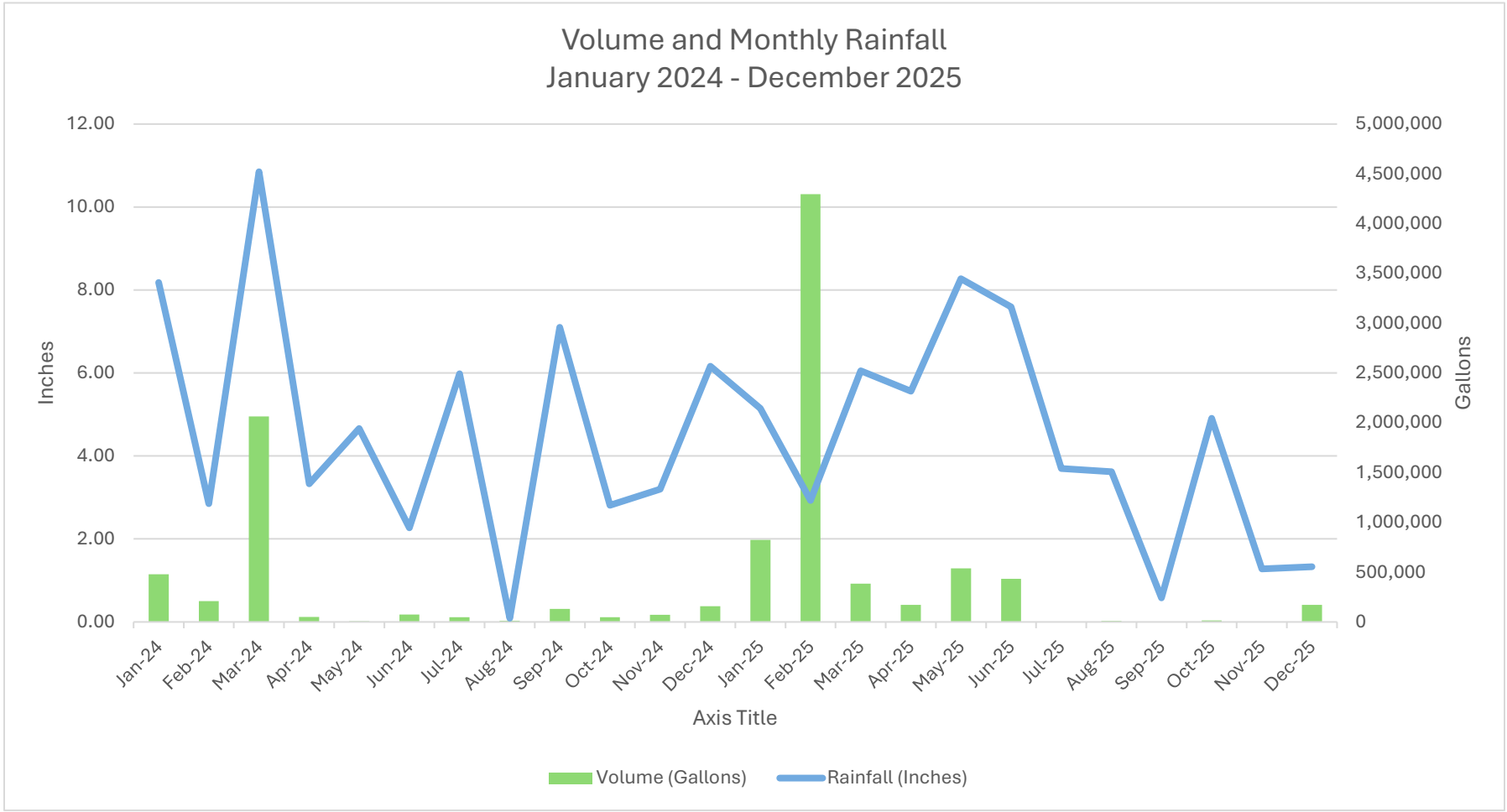


Figure 2-3
Duration of Sanitary Sewer Overflows and Rainfall
January 2024 through December 2025
Annual Report No. 6

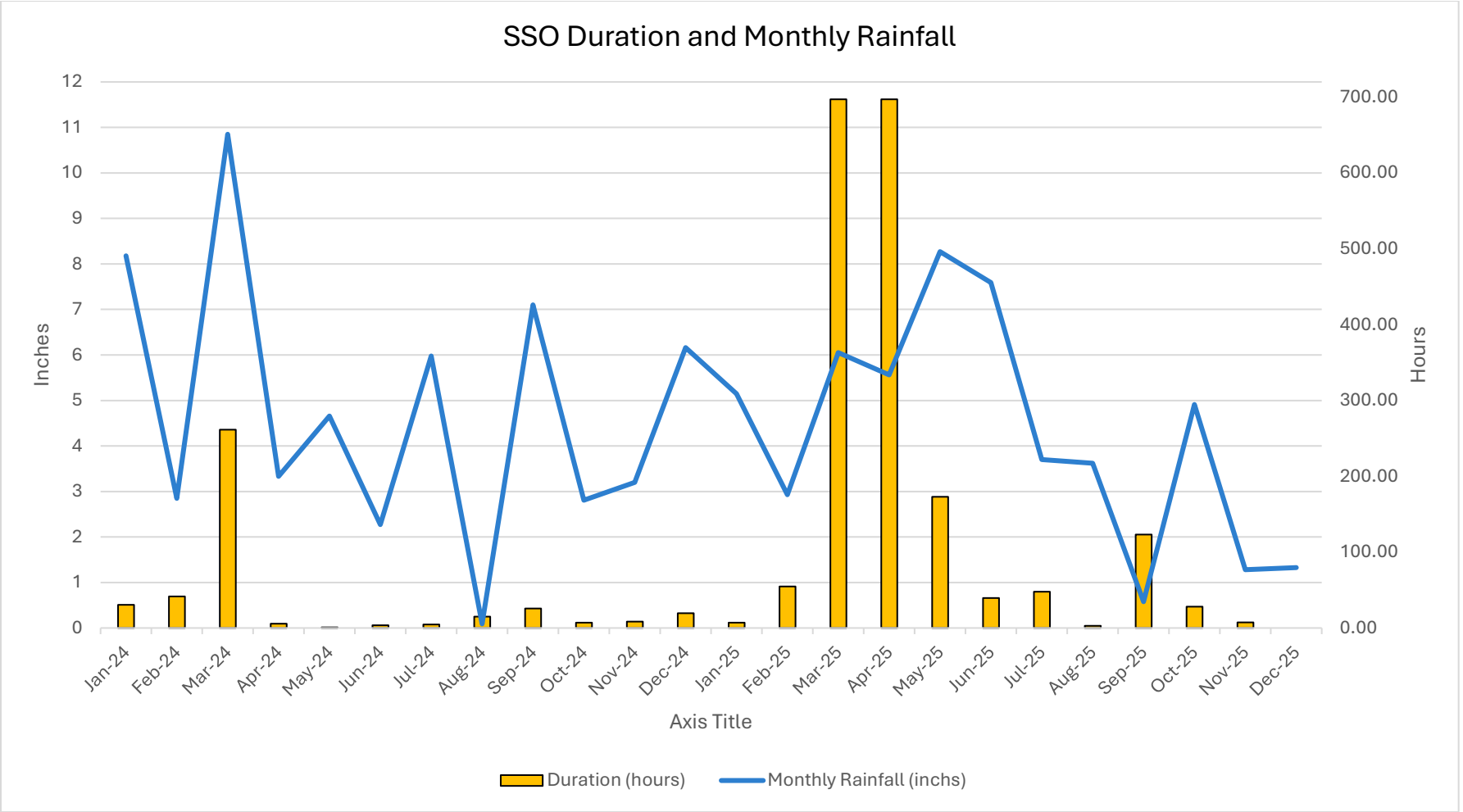
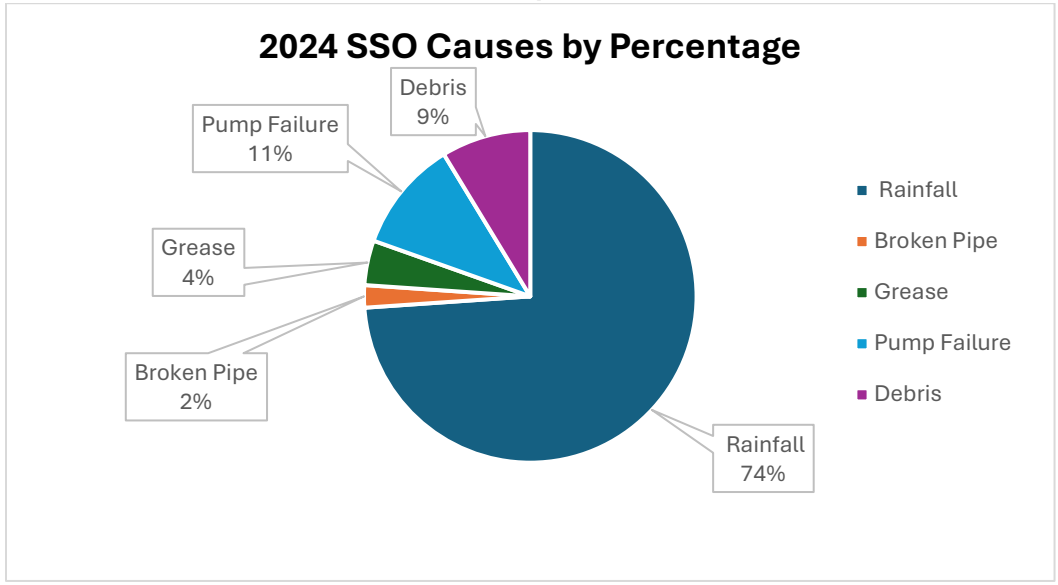


Figure 2-4
Causes of Sanitary Sewer Overflows
January 2024 through December 2025
Annual Report No. 6



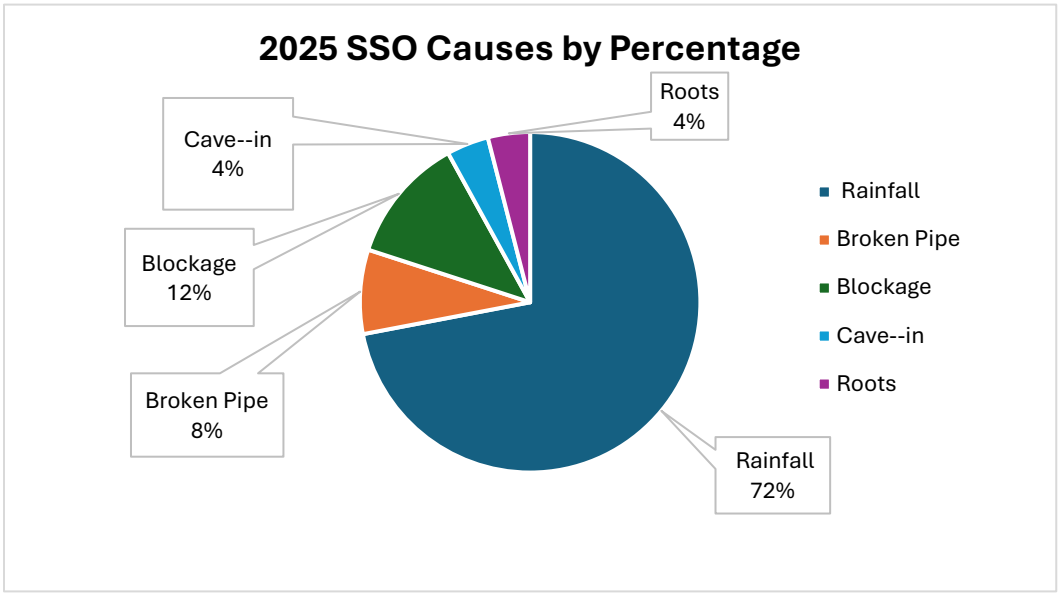
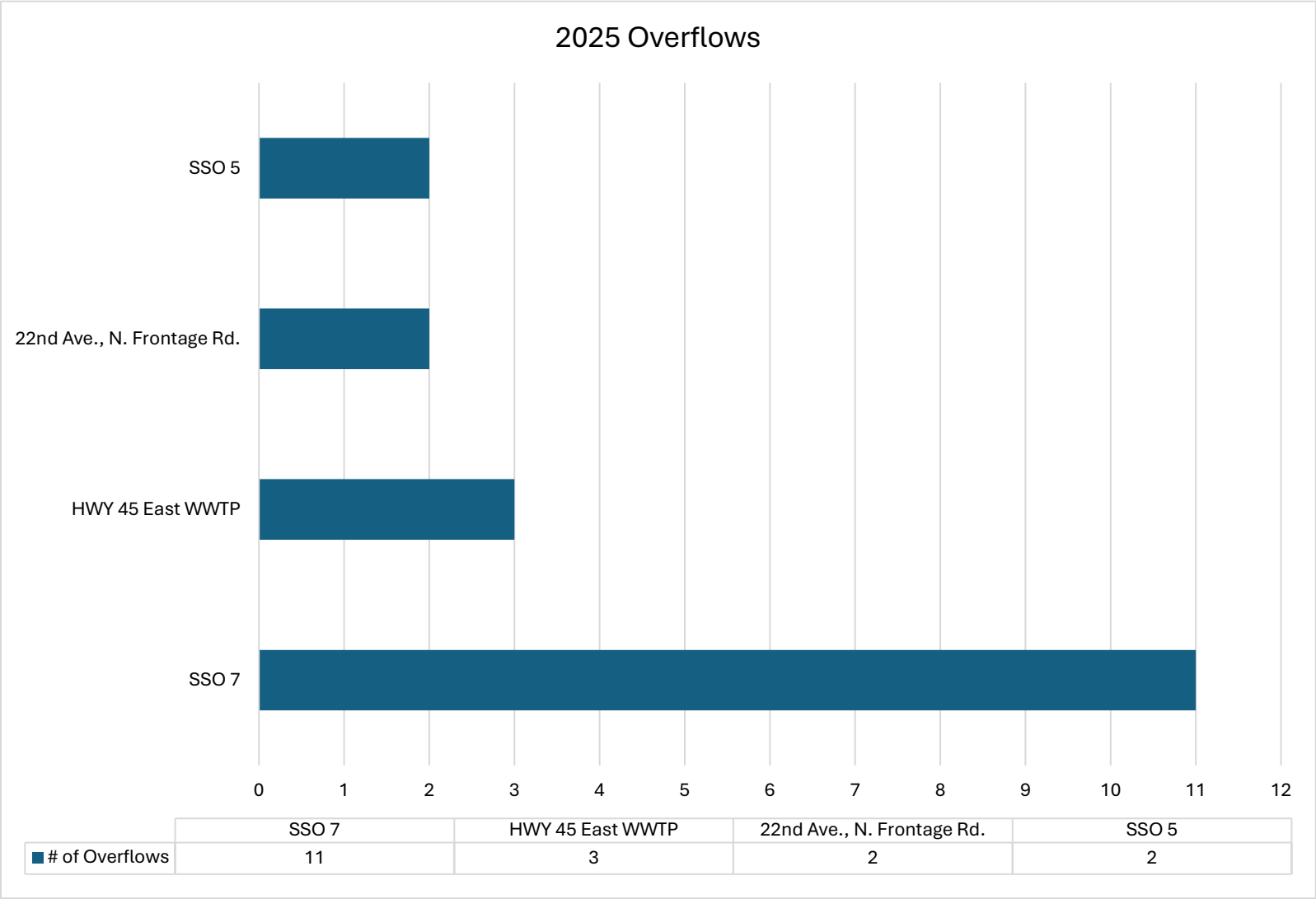


Figure 2-5
Sanitary Sewer Overflows Occurring More Than Once
January 2025 through December 2025
Annual Report No. 6



3.0 Summary of WWTP and WCTS Projects and Activities

The South Wastewater Treatment Plant Rehabilitation Plan was prepared to fulfill the requirements set forth in the Consent Decree. The city is required to develop and implement a Sewer Treatment System Correction Action Plan for the South Wastewater Treatment Plant (WWTP) to address deficiencies in the City's wastewater collection and transmission system with the goal of eliminating SSOs. The following sections briefly describe the projects and activities performed during this reporting period (January 1, 2025 – December 31, 2025) and planned activities for the subsequent reporting period (January 1, 2026 - December 31, 2026).

3.1 Early Action Capital Improvement Project

The Consent Decree required the implementation of a Sewer Treatment System Correction Action Plan (STSCAP) for the South Wastewater Treatment Plant (SWWTP). The purpose of the STSCAP was to provide a plan for the construction of improvements. The STSCAP was submitted to EPA and MDEQ in August 2020 for review and approval. The STSCAP was approved by EPA and MDEQ on May 3, 2021.

The following sections address the Early Action Capital Improvement Project activities for the reporting period (January 1, 2025 – December 31, 2025) and planned activities for the subsequent reporting period (January 1, 2026 - December 31, 2026).

Prior to 2025 and during this reporting period:

SWWTP Equalization Basins Cleanout Project – Completed October 2024

SWWTP Improvements Phase 1-A Project – Construction Completed 2024/Closed Out Q2/2025

- Installed 3 of 6 remaining second stage clarifiers at the 9 MGD plant.
- Installed a new course screen which failed after the award of project in 2024,
- Trained WWTP staff on the operations and maintenance of process equipment
- Substantial Completion June 2025
- Final Completion and closeout July 2025
- Continue evaluating, cleaning, and rehabilitating equipment at the South WWTP to improve plant performance

SWWTP Other Work

- Continued evaluating, cleaning, and rehabilitating equipment at the South WWTP to improve plant performance (Cleaned out Aerobic Digestors)
- Installed additional Mission Control RTUs to monitor key process equipment at the SWWTP
- Issued purchase orders to address intermediate needs at the South WWTP to remain in compliance with the NPDES permit

As discussed previously, a letter was sent by the City to the EPA and the MDEQ on June 15, 2022 proposing modifications to the scope and schedule of the approved South Wastewater Treatment Plant Rehabilitation Plan. This request outlined the city's desire to wait on committing to massive renovations to the existing SWWTP until a new NPDES permit was issued, which would likely include strict nutrient limits (Nitrogen and Phosphorous) requiring greater consideration for treating these constituents.

MDEQ submitted a final permit draft to the EPA for consideration and approval in the first quarter of 2024. The draft permit was deferred by the EPA and MDEQ until additional information could be collected for evaluation and development of a revised draft. A draft permit is expected for review by the city in February 2025. In the interim, the City is committed to continuous improvements at the WWTP to meet its current NPDES permit requirements.

The City will continue to evaluate the feasibility of a new wastewater treatment plant that can accommodate the City's anticipated future flows, growth in residential, commercial, and industrial users, and anticipated changes to the future NPDES permit limits. Additionally, the City is looking at property needed to accommodate a new facility. The following actions in the past 12-month period have resulted in continued improvements in meeting the WWTP's NPDES permit limits.

During the next reporting period:

SWWTP

- Complete small, bundled, bid packages or issue purchase orders to address intermediate needs at the South WWTP and to remain in compliance with the NPDES permit
- Install a new chlorine disinfection system at the SWWTP EQ 4
- Review a task order for additional plant improvements now that a new NPDES permit has been issued
- Conduct an evaluation/life-cycle cost analysis of the SWWTP

EWWTP

- Complete the EWWTP Phase 1 Project - Construct upgrades at the influent pump station and headworks, install new valves, and replace aeration diffusers and miscellaneous small improvements
- Design and install a new cover over the EWWTP treated effluent lagoon
- Prepare the plant to receive an additional 1 mgd after construction of the Eastern Gardens Pump Station; which will divert 1 mgd from the Hwy 80 trunkline which discharges to the SWWTP, providing the SWWTP additional storage capacity to prevent prohibited bypasses

3.2 Highway 80 Trunk Line

The Consent Decree requires work to be performed on the Highway 80 Trunk Line. The Highway 80 Trunk Line Work Plan was approved by EPA and MDEQ on January 21, 2021. The City will assess the Highway 80 Trunk Line to determine the location and extent of structural, capacity, or infiltration and inflow issues within the system. Several techniques will be employed to assess the capacity and condition of the existing Trunk Line. The evaluation will include flow and rainfall monitoring to estimate the quantity of infiltration and inflow (I/I) entering the Highway 80 Trunk Line from contributing sewerbasins. Video inspection of the existing pipe and manholes may be performed; however, the city may proceed with rehabilitation and/or replacement of sections of the existing Trunk Line where imminent structural failure is suspected based on input from operations and maintenance staff, historical information, and initial field investigations. Additional technologies and methodologies may be considered for inspection and evaluation at the discretion of the City.

3.2.1 Highway 80 Trunk Line Work Plan

The Highway 80 Trunk Line Work Plan included methodologies and procedures for monitoring, evaluating, and assessing the Highway 80 Trunk Line. The city received approval from EPA for the Highway 80 Trunk Line Work Plan on January 21, 2021.

3.2.2 Highway 80 Trunk Line Rehabilitation Plan

The Highway 80 Trunk Line Rehabilitation Plan included flow and rainfall monitoring, estimation of infiltration and inflow, condition assessment of the Trunk Line, and development of the rehabilitation plan. Highway 80 Trunk Line Rehabilitation Project, Phase 1 (Complete), Highway 80 Trunk Line Rehabilitation Project, Phase 2-A (Complete) and Highway 80 Trunk Line Rehabilitation Project, Phase 2-B (Awarded), Phase 3 (Start Design) will be incorporated into the Highway 80 Trunk Line Rehabilitation Plan.

During this reporting period:

- Continue to work on projects for rehabilitation of the Hwy 80 Trunk Line including construction of the Hwy 80 Phase 2-B project
- Initiation of planning and design of the Hwy 80 Phase 3 project using WRDA 219 funding in conjunction with the Mobile District Army Corps of Engineers

During the next reporting period:

- Continue to work on projects for rehabilitation of the Hwy 80 Trunk Line including construction of the Hwy 80 Phase 2-B project
- Complete a title study of parcels, survey parcels for access roads, acquire easements for construction and complete the design/build project to accept RFPs in first quarter 2027. (Construction using WRDA 219 funding in conjunction with the Mobile District Army Corps of Engineers)
- Close out the Hwy 80 Phase 2-B project

3.3 Wastewater Collection and Transmission System (WCTS)

The Consent Decree requires work to be performed on the Wastewater Collection and Transmission System (WCTS). The City of Meridian has developed a phased approach for prioritizing assessment, analysis, and rehabilitation of the existing WCTS as required under the Consent Decree. This phased approach will facilitate identification, prioritization, and rehabilitation of structural defects, capacity issues, and problems that allow infiltration and inflow(I/I) into the WCTS.

3.3.1 Sewerbasin Prioritization Work Plan

The Sewerbasin Prioritization Work Plan includes methodologies and procedures for estimating Infiltration and Inflow within each Sewerbasin and for assessing the capacity of the WCTS in areas with known capacity related SSOs. EPA and MDEQ approved the City's Sewerbasin Prioritization Work Plan on January 21, 2021.

3.3.2 Sewerbasin Prioritization Report

This work includes flow and rainfall monitoring, estimation of base infiltration and rainfall dependent infiltration and inflow, updates to existing GIS data, capacity evaluation of major sanitary sewer gravity mains, and development of the Sewerbasin Prioritization Report approved on June 25, 2024.

During this reporting period:

- Submitted the Sewerbasin Evaluation Plan for agency review and approval on June 25, 2025; and approved by EPA on November 10, 2025
- Performed interim repairs on several critical pump stations
- Started planning the work for the SSES and Pump Station Evaluation

During the next reporting period:

- Develop task orders to perform work approved in the Sewerbasin Evaluation plan on
- Start the approved work for the SSES and Pump Station Evaluation

3.3.3 Repair of 54-Inch Diameter Sanitary Sewer Interceptor

The Repair of 54-Inch Diameter Sanitary Sewer Interceptor Project included replacing a segment of the existing interceptor south of I-20/59 that was damaged due to creek bank erosion along Sowashee Creek. Completed construction on August 19, 2023.

3.3.4 West Meridian Trunk Line Phase 1 and Phase 2 Rehabilitation

The West Meridian Trunk Line Phase 1 Rehabilitation Project includes realignment of a reinforced concrete gravity sewer pipe, with diameters of 24-inch and 30-inch, which conveys wastewater from the westernmost portions of the City of Meridian to the 54-inch diameter pipe near 49th Avenue, south of Sowashee Creek. Two major collapses have occurred along this portion of the West Meridian Trunk Line and other cave-ins are beginning to develop along the existing alignment. These collapses contribute to half of the City's sanitary sewer overflows at SSO-7, located at 181 65th Avenue.

During this reporting period:

Phase 1

- Worked on acquiring a final easement for the West Meridian Phase 1 Project from the Greenfield Trust required to advertise prior to bidding the project. Hired an environmental consultant knowledgeable of creosote site work to produce a Work Plan for approval by the Greenfiled Trust, EPA, and MDEQ.

Phase 2A

- Signed a Letter Agreement with the UASCE to start planning and designing the West Meridian Phase 2 Project under a Section 219 grant
- Cleaned and surveyed the gravity sewer for NASSCO evaluation.

Delivered results to the Mobile Corps to start design

Phase 2B

- Finished design of the Phase 2B gravity sewer and prepared to advertise and bid the work
- Awarded the contract to Suncoast

During the next reporting period:

- **Phase 1** -Complete Greenfield easement acquisition and bid the West Meridian Phase 1 Project and start construction
- **Phase 2A** - Continue design of the West Meridian Phase 2A Project with the USACE
- **Phase 2B** - Issue the Notice to Proceed for the West meridian Phase 2B Project; finish construction and close-out of project

3.3.5 Sanitary and Storm Sewer Rehabilitation Annual Contract

The Sanitary and Storm Sewer Rehabilitation Annual Contract will be used to perform open cut and trenchless rehabilitation of gravity sanitary sewer mains and manholes.

During this reporting period:

- Complete construction of new Work Orders 1 and 2 (ARPA Contract 24-08), which included gravity sanitary sewer rehabilitation at various SSO locations and critical repair sites discovered in 2024, as well as work provided under a separate contract (Contract 24-23) with CES.

During the next reporting period:

- Complete all construction and close-out documents under Work Order 1/2 under the ARPA Sanitary and Storm Rehabilitation Annual Contract. This work will conclude repairing over 18 Million in wastewater gravity sewer to reduce SSOs.

3.3.6 Eastern Gardens Pump Station

The City identified a sewer main break at an inverted siphon located in the northeast portion of the WCTS causing sewage to be discharged into Sowashee Creek. A temporary bypass pump system was installed to halt the release and convey the sewage from the existing 18-inch gravity sewer main, across Sowashee Creek, and into the WCTS. Plans are being developed to construct a new permanent pump station. This new pump station will also eliminate an existing 10-inch diameter aerial gravity sewer main, which is in poor condition, currently crossing Sowashee Creek. The City's plan for the design of this new pump station will include the flexibility to pump to either the East or the South WWTPs.

During this reporting period:

- Operated and maintained temporary bypass pumping system
- Completion of 100% Design Drawings

- Received approval of the USACE permit
- Responded to requests for additional information associated with the railroad permit
- Prepared easement plats

During the next reporting period:

- Continue operation of the temporary bypass pumping system
- Review 100% design of new pump station, gravity sewer, force main, and gravity sewer rehabilitation
- Acquire easements
- Receive approval of the railroad permit
- Advertise once permits and easements are fully executed and bid for construction
- Advertise and bid project

3.3.7 B Street Sanitary Sewer Replacement

Historical information and observations of the existing 24-inch diameter B Street gravity sewer main indicate critical structural issues along the existing vitrified clay pipe (VCP) from 8th Avenue to St. Andrews Street. City staff have reported numerous pipe failures over the last thirty years. The B Street Sanitary Sewer Replacement Project will replace approximately 6,130 linear feet of existing pipe eliminating problems associated with the deteriorating clay pipe.

During this reporting period:

- Applied for railroad permit
- Located all city water lines
- Completed 60% plan documents

During the next reporting period:

- Finalize railroad permit and complete 100% documents to advertise to bid
- Receive bids and award work

3.4 Chronic SSO Advanced Remote Monitoring Program

The Consent Decree requires a Chronic Sanitary Sewer Overflow (SSO) Advanced Remote Monitoring Program which includes compiling a list of Chronic SSO locations in the WCTS which has experienced more than one wet-weather capacity-related SSO in the previous twelve months.

3.4.1 Chronic Sanitary Sewer Overflow List

The City of Meridian was required to submit an initial Chronic SSO List to the EPA and MDEQ in August 2020 for review and approval (approved January 2021). An Updated Chronic SSO List was submitted in June 2022, June 2023, June 2024, and June 2025 and will continue to be submitted each year thereafter for the duration of the Consent Decree.

3.4.2 Updated Chronic Sanitary Sewer Overflow List

The City of Meridian prepared and submitted the fifth Updated Chronic Sanitary Sewer Overflow List for review and approval on June 25, 2025. The Updated Chronic Sanitary Sewer was approved on November 1o, 2025, resulting in the removal of seven (7) existing sanitary sewer overflows that no longer met the definition of a Chronic SSO. Challenging work by the city and its contractors around these locations in removing obstructions, repairing the gravity sewer and manholes, and reducing I/I, eliminated the causes of these SSOs. The seven locations include:

- SSO 2 @ Stribling Equipment/Highway 11/80;
- SSO 3 North Frontage Road / 22nd Avenue;
- SSO 4 North Frontage Road / 18th Avenue;
- SSO 6 @ 10th Avenue / B Street;
- SSO 8 @ 36th Street / Parkway Boulevard;
- SSO 9 @ 40th Avenue / 26th Street;
- SSO 11 @ 31st Street / Parkway Blvd.

During this reporting period:

- Prepared the Updated Chronic Sanitary Sewer Overflow List and submitted for agency review and approval on June 25, 2025; approved on November 10, 2025
- Implemented the 2025 Updated Chronic Sanitary Sewer Overflow List
- Reported SSO occurrences as per the approved SORP and CD requirements

During the next reporting period:

- Continue to report SSOs per the approved SORP and CD requirements
- Prepare and submit the 2026 Updated Chronic SSO List as required by the Consent Decree in June 2026 with comments on potentially removing some of the existing SSO locations based on work performed by the city and the reduced frequency of SSOs at each location

3.4.3 Chronic SSO Advanced Remote Monitoring Program

After the approval of the 2021 Updated Chronic Sanitary Sewer Overflow (SSO) List on June 30, 2021, the City of Meridian implemented the Chronic SSO Advanced Remote Monitoring System and began remotely monitoring nine (9) locations identified in the List.

During this reporting period:

- Continued monitoring, recording, and notifying City staff of full pipe, surcharge, and overflow conditions identified by the monitors installed at locations identified in the approved 2025 Updated Chronic SSO List
- Included Remote Monitoring alarm logs in Semi Annual Reports 12 and 13 as required in the Consent Decree

During the next reporting period:

- Continue recording and reporting all surcharge conditions identified by the monitors in subsequent Semi Annual and Annual Reports as required by the Consent Decree
- Include Remote Monitoring alarm logs in Semi Annual Reports 14 and 15 as required in the Consent Decree
- Continue implementation of remote Monitoring Program, including the next phase of monitoring in the SSES

4.0 Capacity, Management, Operations and Maintenance Programs

The City developed and implemented Capacity, Management, Operations, and Maintenance (CMOM) programs based on guidance provided by the EPA. The CMOM programs are comprised of nine separate CMOM documents developed to address deficiencies within the City of Meridian's WCTS. Each Program, or Plan, is intended for use by the City of Meridian as guidance and implementation of standard operating procedures to control the legal, financial, management, operations, and maintenance of the WCTS. And to review and incorporate continuous improvements to the CMOMs as technologies change and legislation modified to comply with the Clean Water Act (CWA).

The following sections briefly overview the CMOM activities performed during this reporting period (January 1, 2025 – December 31, 2025) and planned activities for the subsequent reporting period (January 1, 2026 – June 30, 2026).

4.1 Sewer Overflow Response Plan (SORP)

The Consent Decree required the development and implementation of a Sewer Overflow Response Plan (SORP). The SORP is a component of the City's comprehensive CMOM Programs and is intended to establish standardized procedures for the City of Meridian Public Works Department staff to follow in the event of a sanitary sewer overflow (SSO). The procedures prescribed in the SORP comprise specific documentation/reporting and response measures to convey pertinent and practical SSO information with the goal of minimizing the impact of SSO events to public health and the environment. The objective of the SORP is to provide a plan for responding to, cleaning up, and minimizing the impact of SSOs in a timely manner. The Program was approved by EPA on September 14, 2020 and implemented by September 2021.

During this reporting period:

- Completed draft revisions to the original SORP document for approval
- Created SORP training curriculum and slides
- Continued training and working with city staff on QA of SSO reporting and assistance with questions related to the SORP & SSO reporting and documentation procedures
- Continued to track and document performance measures manually

During the next reporting period:

- Complete QA and submit revisions to the original SORP document for EPA/MDEQ approval
- Conduct SORP training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks

Table 4-1A. Implementation Schedule for Specific SORP Tasks

Date of Implementation	Task	Activity
Immediately upon EPA approval of the SORP	Initiation of SORP training & implementation	Completed & Training Ongoing
Within 12 months of EPA approval of the SORP	Completion of SORP's SOP development	Completed (2021)
Concurrently with the development of the Pump Station and Force Main Operations and Preventative Maintenance Program, due within 18 months of the Effective Date of the Consent Decree (i.e., 2/6/2021)	Develop list of pump station SSOs having been recorded as overflowing more than once in the previous twelve (12) Months	Completed (2021)
	Develop list of potential SSO locations in the event of a Pump Station failure	Completed (2021)

Table 4-1B. Annual SORP performance measures

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
Compliance with Regulatory Agency Reporting of SSOs	On-time compliance for submittal of 24-hour oral notification of confirmed SSO to MDEQ	(# of notifications completed within 24-hrs. / ∑ # of reports per year) * 100	100%	96%
	On-time compliance for submittal of 5-day follow-up written report of confirmed SSO to MDEQ	(# of follow-up written reports / ∑ # of reports per year) * 100	100%	76%
SSO Response Training	All personnel involved in SSO response, reporting, & record keeping participate in annual SORP training	(# of employees trained / ∑ # of employees with SSO responsibilities) * 100	100%	100%
Periodic Evaluation of SORP	Annual review, evaluation, and revision, as necessary, to SORP	Value	Once per Year	Completed
Frequency of SSOs	Track the number of annual SSOs per 100 miles of WCTS system	(Number of SSOs/100 mi. of sewer) / year	Trend	7.81
Average SSO Volume	Track the average SSO release volume per 100 miles of WCTS system annually	(Volume of overflow/ # of SSOs / 100 mi. of sewer) / year	Trend	85,492

4.2 Emergency Response Plan (ERP)

The Consent Decree required the development and implementation of an Emergency Response Plan (ERP). The purpose of the ERP is to provide a plan for responding to routine and catastrophic emergencies. Routine emergencies include such situations as overflowing manholes, line breaks, pump station failure, etc. Catastrophic emergencies include situations such as floods, tornadoes, and other natural disasters. The Program was approved by EPA on September 14, 2020 and implemented by September 2021.

During this reporting period:

- Completed draft revisions to the original ERP document for approval
- Created ERP training curriculum and slides
- Continued to track and document performance measures manually

During the next reporting period:

- Complete QA and submit revisions to the original ERP document for EPA/MDEQ approval
- Conduct ERP training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks

Table 4-2A. Implementation Schedule for Specific ERP Tasks

Task	Date of Completion	Activity
Procurement and installation of video conferencing system in Public Works Complex Conference Room	Within 6 months of EPA approval	Completed (2021)
ERP SOP development	Within 12 months of EPA approval	Completed (2021)
Initiation of ERP training & implementation	Within 12 months of EPA approval *	Completed (2021) & training activities ongoing
All program elements implemented/in-place	18 months from EPA approval of plan	Completed (2021)

** Initiation of SORP training & implementation (for SSO events) is scheduled to begin immediately upon EPA's approval of the SORP*

Table 4-2B. Annual ERP Performance Measures

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
Adherence to SORP's Performance Measures	Due to the interrelationships/ commonalities between the two plans, successful adherence of SORP's listed performance measures will promote effectiveness of ERP.	Value	See SORP	Achieved
Routine Evaluation of ERP	Annual review, evaluation, and revision, as necessary, to ERP	Value	Once per Year	Completed
ERP Orientation	Orientation of new employees to include basic ERP training module	(# of new employees trained / ∑ # of new employees hired) * 100	100%	100%
ERP Training	All personnel involved in ERP procedures participate in annual ERP training	(# of employees trained / ∑ # of employees with ERP responsibilities) * 100	100%	100%
Conformance with EPA's RMP Requirements*	South WWTP's RMP to be revised and resubmitted to EPA every five years	Value	Every Five Years	Achieved

**Next scheduled revision and submittal of WWTP's RMP set for 4/1/2029*

4.3 Sewer Mapping Program (SMP)

The Consent Decree required the development and implementation of a Sewer Mapping Program (SMP) is a component of the City's comprehensive CMOM programs established to update the City's GIS-based sewer mapping system. The program provides for the maintenance of a comprehensive inventory of WCTS components and assets, including relevant attributes, catalogued by service area. As part of the SMP program development and implementation, the City utilizes the ESRI GIS platform as the mapping component of its Information Management System (IMS) to provide real-time, visual information for planning and scheduling system maintenance. The Program was approved by EPA on September 14, 2020 and implemented by March 2022.

During this reporting period:

- Completed draft revisions to the original SMP document for approval
- Created SMP training curriculum and slides
- Continued to track and document performance measures manually
- Added new project information to GIS (As-Builts, FSEs, Focal Easements, Field Corrections, etc.) to improve the accuracy and reliability of the city's GIS sewer

infrastructure

During the next reporting period:

- Complete QA and submit revisions to the original SMP document for EPA/MDEQ approval
- Conduct SMP training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks
- Continue adding new project information to GIS (As-Builts, FSEs, Focal Easements, Field Corrections, etc.) to improve the accuracy and reliability of the city's GIS sewer infrastructure

Table 4-3A Implementation Schedule for Specific Sewer Mapping Program Tasks

Task		Date of Completion	Activity
Procurement of GIS software		Within 6 months of EPA approval	GIS software package selected. 3/15/2021
Finalization of Data Dictionary		Within 9 months of EPA approval	Data Dictionary finalized. 6/15/2021
System capabilities for integrating electronic maps showing locations of following:	Surface streets/ addresses	Within 12 months of EPA approval	Completed 9/15/2021
	Surface water bodies		Completed 9/15/2021
	Political boundaries		Completed 9/15/2021
Development of standardized project specifications for inclusion in City's construction documents		Within 12 months of EPA approval	Completed 9/15/2021
Development of Sewerbasin layer		Within 12 months of EPA approval	Completed 9/15/2021
Sewer Mapping Program SOP development		Within 18 months of EPA approval	SOP's developed 3/2022
Creation of a FOG establishments layer		Within 18 months of EPA approval	FOG data loaded into GIS 3/2022, new facilities are added as they are permitted.
Electronic mapping of each basin in the WCTS		*	Basins identified based on available data and as-builts. Basin boundaries will be validated during upcoming SSES
All Program elements implemented/in-place		18 months from EPA approval of plan	Program in place for addition of new construction and data collected during the sewer evaluation program for priority basins.

**As part of the implementation phase, assets located within each respective Sewerbasin will be captured over time using the prioritization methodology defined within the Sewer Basin Prioritization Work Plan and Sewerbasin Prioritization Report*

Table 4-3B. Annual Sewer Mapping Program performance measures

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
# of Record Drawings Backlogged	Number of new record drawings to be incorporated into GIS system database during report period	Value	25	0
# of New WCTS Assets Backlogged	Number of new WCTS assets not incorporated into GIS system database within 60 days of their activation in the field	Value	0	0
Average Change Time	The average time from the receipt of data indicating new sewer assets and the sewer network being updated to display those assets	Average of days between new data being received and it being added to the system	60 days	1
# (or %) of Sewer Mains Mapped	Number of lines mapped/ updated per year	Value (or # Linear Feet Mapped / ∑ Linear Feet in System)	__	45
Training Hours	Number of hours spent every year on continuing GIS education, per employee	# of training hours logged by GIS Staff / # of GIS Staff	40 hrs.	App. 20 hrs. 1 employee

4.4 Gravity Sewer System Operations and Maintenance Program (GSSOMP)

The Consent Decree required the development and implementation of a Gravity Sewer System Operations and Maintenance Program (GSSOMP). The purpose of the Gravity Sewer System Operations and Maintenance Program is to provide a plan for preventative operations and maintenance (O&M) to reduce the occurrence of gravity sewer blockages and/or line deterioration, specifically those of which contribute to potential SSO events. The Program was approved by EPA on May 3, 2021 and implemented by May 2022.

During this reporting period:

- Continued clearing gravity system focal easements
- Continued manually tracking and documenting performance measures
- Completed draft revisions to the original GSSOMP document for approval
- Created GSSOMP training curriculum and slides

During the next reporting period:

- Complete QA and submit revisions to the original GSSOMP document for EPA/MDEQ

approval

- Conduct GSSOMP training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks
- Continue clearing focal easements to prepare the areas for access road construction

Table 4-4A. Implementation Schedule for Specific Gravity Sewer System O&M Tasks

Task	Date of Required Implementation	Activity
Development of City's GS design standards	Within 6 months of EPA approval	Completed (2023)
Location of Focal Easements	Within 9 months of EPA approval	Completed (2022)
Initiation of program training & implementation	Within 12 months of EPA approval	Completed
SOP development	Within 12 months of EPA approval	Completed (2022)
All program elements implemented	12 months from EPA approval of Program	In Progress*

** All Program elements will be implemented upon EPA's approval of the Sewer Group Evaluation Plan.*

Table 4-4B. Gravity Sewer System O&M Program Annual Performance Measures

Performance Measure	Description	Trigger	Calculation	Target Annual Value	Actual Annual Value
Linear Footage of Gravity Sewer Line Cleaned	Linear footage of gravity sewer pipe cleaned annually	Corrective	Value	Reduction in Annual Trend	14,102
		Preventive	Value	6.67%*	9,263
Linear Footage of Gravity Sewer Line Inspected	Linear footage of gravity sewer pipe inspected annually	Corrective	Value	Reduction in Annual Trend	14,102
		Preventive	Value	6.67%*	3,147
Number of Manholes Cleaned/Maintained	Number of manholes cleaned/maintained annually	Corrective	Value	Reduction in Annual Trend	22
		Preventive	Value	6.67%*	-
Number of Manholes Inspected	Number of manholes inspected annually	Corrective	Value	Reduction in Annual Trend	-
		Preventive	Value	6.67%*	-
Easement Footage Inspected	Linear footage of easements inspected	NA	Value	1/5 of Linear Footage**	5,880
Easement Footage Cleared	Linear footage of easements cleared		Value	1/5 of Linear Footage**	5,880
SSOs per Mile of Gravity Sewer	Number of annual SSOs per mile of gravity sewer piping		(# of SSOs) / ∑ mi. of GS pipe	Reduction in Annual Trend	0.033
Routine Evaluation of Program	Annual review, evaluation, & revision to Program (as required)		Value	Once per Year	Completed

** Based on running annual average over the previous three years.*

*** Based on running annual average over the previous five years.*

**** Cleaning and/or inspection of WCTS assets located within Sewer Group 3, as determined in the forthcoming Sewerbasin Prioritization Report, will be addressed as part of the CMOM's Gravity Sewer System Operations and Maintenance Program (see following description). As part of the Consent Decree-required Sewer Group Evaluation Report and Rehabilitation Plan, the WCTS service area is to be divided into discrete sewerbasins. Then, based upon identified rehabilitative needs, the sewerbasins will be assigned classification within Sewer Groups 1, 2, or 3. As described in the Gravity Sewer System Operations and Maintenance Program plan, once the WCTS is delineated into final sewerbasins and a classification of Sewer Group 1, 2, or 3 is assigned, the City will initiate the process of scheduling and performing routine cleaning systematically by sewerbasin on gravity lines within Sewer Group 3 (i.e., starting at the upstream portion of the basin and working downstream). Cleaning and/or inspection of WCTS assets located within Sewer Group 3 will be addressed as part of this Program and the procedures as described herein.*

4.5 Pump Station and Force Main Operations and Preventative Maintenance Program (PSFMOPMP)

The Consent Decree required the development and implementation of a Pump Station and Force Main Operations and Preventative Maintenance Program (PSFMOPMP). The purpose of the Pump Station and Force Main Operations and Preventative Maintenance Program is to facilitate proper operation and maintenance activities associated with the Pump Stations and Force Mains within the WCTS. The Program was approved by EPA on February 2, 2021 and implemented by May 2022.

During this reporting period:

- Completed draft revisions to the original PSFMOPMP document for approval
- Created PSFMOPM training curriculum and slides
- Continued manually tracking and documenting performance measures
- Continued interim rehabilitation of select pump stations

During the next reporting period:

- Complete QA and submit revisions to the original PSFMOPMP document for EPA/MDEQ approval
- Conduct PSFMOPM training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks
- Start the Pump Station Evaluation

Table 4-5A. Implementation Schedule for Specific PS/FM O&PM Program Tasks

Program Task	Date of Required Implementation	Activity
Development of City's PS and FM design standards	Within 6 months of EPA approval	Completed (2023)
Classification of each PS as "high, medium, or low risk"	Within 9 months of EPA approval	Completed (2022)
Initiation of program training & implementation	Within 12 months of EPA approval	Initiated June 2022
SOP development	Within 12 months of EPA approval	Completed (2022)
Development/implementation of remote monitoring system component	Phased implementation*	See previous summary
All program elements implemented/in-place	12 months from EPA approval of plan	All components in progress

**"high" & "medium" risk stations have been equipped with remote monitoring devices. Next phase of work involves a comprehensive Pump Station Evaluation following the SSES approved by EPA and MDEQ.*

Table 4-5B. Pump Station and Force Main O&PM Program Annual Performance Measures

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
Linear Footage of FM Inspected	Linear footage of force main pipe inspected annually (surface inspection)	Value	33.3%	** Value to be tracked using IMS
SSOs per Mile of FM*	Number of annual SSOs per linear mile of force main piping	(# of SSOs) / ∑ miles of FM	Reduction in Annual Trend	1.724
SSOs per Pump Station*	Number of annual SSOs per number of pump stations	(# of SSOs) / ∑ # of PS	Reduction in Annual Trend	0.37
Percentage of Pump Station-Related SSOs*	Number of annual SSOs resulting from PS malfunctions	(# of SSOs from PS malfunctions / ∑ # annual SSOs events) * 100	Reduction in Annual Trend	0
Percentage of Force Main-Related SSOs*	Number of annual force main-related SSOs per mile of force main	((# of SSOs from FM SSOs / ∑ miles of FM) / ∑ # annual SSOs events) * 100	Reduction in Annual Trend	0%
Unscheduled Pump Station Maintenance	Number of UNPLANNED pump station maintenance activities based on issued work orders	Value	Reduction in Annual Trend	** Value to be tracked using IMS in 2026
Force Main System Report Generation	Generation of reports listing equipment problems/status of work orders generated during prior Month	Value	To commence 2026/Monthly	TBD in 2026**
Routine Evaluation of Program	Annual review, evaluation, and revision, as necessary, to Program	Value	Once per Year	Completed
Pump Station and Force Main System Training	All personnel involved in procedures participate in annual training	(# of employees trained / ∑ # of employees with FM responsibilities) * 100	100%	100%/ 3 employees

** Based on running annual average over the previous three years.*

*** KPI data to be generated upon City's full implementation of the IMS component of CMOM*

4.6 Legal Support Program (LSP)

The Consent Decree required the implementation of a Legal Support Program (LSP). The purpose of the Legal Support Program is to provide a means for the development and enforcement of rules and regulations with respect to FOG control, Private Laterals, and other mandates of the sewer consent decree The Program was approved by EPA on May 3, 2021 and implemented by October 2022.

During this reporting period:

- Completed draft revisions to the original LSP document for approval
- Created LSP training curriculum and slides
- Continued manually tracking and documenting performance measures
- Delivered suggested revisions to the city FOG coordinator to consider changes to the city's water and sewer ordinances to improve consent decree compliance

During the next reporting period:

- Complete QA and submit revisions to the original LSP document for EPA/MDEQ approval
- Conduct LSP training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks
- Review draft amendments to Chapter 25 of the City's Sewer and Water Ordinance to include a FOG Permit Process, Fog Fee Schedule, Liquid Hauler Permit Process, and mandatory use of custom BMP software the city uses to manage FOG

Table 4-6A. Implementation Schedule for Legal Support Tasks

Program Task	Date of Completion	Activity
Development of amended Water and Sewers Ordinance	Within six (6) months of EPA and MDEQ approval of the FOG Control Program	Completed
Adoption of amended Water and Sewers Ordinance by City Council	Within twelve (12) months of EPA and MDEQ approval of the FOG Control Program	Completed

4.7 Information Management System Program (IMS)

The Consent Decree required the development and implementation of an Information Management System (IMS) Program. The purpose of the Information Management System (IMS) Program is to provide City Managers and Supervisors guidance and reporting capabilities for Management, Operations and Maintenance activities. The Program was approved by EPA on October 15, 2021 and implemented by October 2023.

During this reporting period:

- Completed draft revisions to the original IMS document for approval
- Created IMS training curriculum and slides
- Continued manually tracking and documenting performance measures
- Conducted semi-annual training for the City of Meridian staff

During the next reporting period:

- Complete QA and submit revisions to the original IMS document for EPA/MDEQ approval
- Conduct IMS training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks
- Continue to track and document performance measures manually

- Provide additional training as needed for asset management

Table 4-7A. Implementation Schedule for Specific IMS Program Tasks

Program Task	Date of Completion
Initiation of Selection/Procurement of IMS Software	IMS Package selected 2/2022
Development of IMS Configuration/Programming	12/2022 configuration and programing
Staff Training Program Component Developed	System Administrator trained 12/2022 User training scheduled 4/2023
All program elements implemented/in-place *	24 months from EPA/MDEQ approval
GIS mapping component implemented	GIS and Cityworks database integration 01/23, full operation by August 5, 2023

* *All IMS Program components with exception of the GIS mapping component anticipated 10/2023*

Table 4-7B. Key IMS Program Performance Indicators

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
Average number of days to enter new assets into the IMS	The City will track the time from submittal of an as-built drawing to the time that the asset information is entered into the IMS.	Days from as-built submittal to asset entry	60 days or less	< 30 days
Average number of days to enter IMS inaccuracy report data into the IMS	The City will track the time from submittal of a GIS inaccuracy report to the time that the correction is made into the IMS.	Days from inaccuracy report submittal to data entry.	60 days or less	< 2 weeks
Annual Training	At a minimum, all Public Works staff whose role requires interfacing with Program software will participate in annual "refresher" training.	Value	100%	100%
Routine Evaluation of Program	Annual review, evaluation, & revision to Program (as required)	Value	Once per Year	Completed

4.8 Fats, Oils, and Grease Control Program (FOG)

The Consent Decree required the development and implementation of a Fats, Oils, and Grease (FOG) Control Program. The purpose of the FOG Control Program is to provide a plan to address Fats, Oils, and Grease in the WCTS. The Program was approved by EPA on October 15, 2021 and implemented by October 2022.

During this reporting period:

- Completed draft revisions to the original FOG document for approval
- Created FOG training curriculum and slides
- Continued manually tracking and documenting performance measures

- Continued FSE site visits and inspections
- Continued populating FOG management software (BMP)

During the next reporting period:

- Continue implementation of FOG Control Program
- Continue utilizing the *FOG BMP* platform for FOG-related inspection activities and record keeping
- Implement the FOG Public Outreach Plan
- Continue CCTV inspection of identified FOG hotspots (as described in the FOG Characterization Study)
- Continue implementation activities associated with staffing (technical/legal) and equipment requirements for Program's execution
- Complete QA and submit revisions to the original FOG document for EPA/MDEQ approval
- Conduct FOG training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks

Table 4-8A. Implementation Schedule for Specific FOG Program Tasks

Program Task	Date of Completion	Activities
Perform FOG Characterization Study	Within 12 months of EPA/MDEQ approval	Completed (2022)
Establishment of staffing (technical/legal) & equipment requirements	Within 16 months of EPA/MDEQ approval	Completed
Development of design and construction standards	Within 18 months of EPA/MDEQ approval	Completed
Development of a "living" list of commercial establishment FOG generators (which is to include a description of their FOG generating processes & estimated average quantity of FOG generate daily)	Within 18 months of EPA/MDEQ approval	Living List Development Completed
Establishment of a FOG Control Program training component	Within 18 months of EPA/MDEQ approval	Completed with training ongoing
Development of compliance and construction inspection protocols	Within 18 months of EPA/MDEQ approval	Completed
Enactment of the FOG Ordinance	Within 24 months of EPA/MDEQ approval	Completed
Development of FOG control device BMPs	Within 24 months of EPA/MDEQ approval	Completed
Development of compliance assistance program for FOG generators	Within 24 months of EPA/MDEQ approval	Completed
Development of a public education/outreach component targeting non-commercial/residential customers	Within 24 months of EPA/MDEQ approval	Outreach plan completed
All program elements implemented/in-place	Within 24 months of EPA/MDEQ approval	All components in progress

Table 4-8B. 2023 Annual FOG Control Program Annual Performance Measures

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
Number of SSOs due to FOG	The annual number of FOG-related SSOs	Value	Reduction in Annual Trend	0
Number of Inspections per Year for Each FSE	Upon full implementation, each listed FSE should be routinely inspected (including FOG control device) by City staff no less than once every two years.	Each FSE inspected ≥ once / every 2 years	100%	100%
Current Commercial Establishment FOG Generator List	The City will review and update its list of commercial establishment FOG generators (including permitted FSEs) on an annual basis.	Value	Once per Year	Completed
Resolution of Non-Compliance	The City will track resolution of commercial FOG generators determined to be out of compliance with Program/ordinance.	Value	100%	100%
Program Training	All personnel involved in FOG Control Program complete the required training curriculum.	Value	100%	100%
Routine Evaluation of Program	Annual review, evaluation, and revision, as necessary, to the Program. As part of this evaluation, the need for additional personnel will be assessed based on the Program's workload.	Value	Once per Year	Completed

** To be determined upon full implementation of the FOG Control Program. For Year 2023, FOG Coordinator conducted routine inspections on approximately 170 FSEs.*

4.9 Financing and Cost Analysis Program (FCAP)

The Consent Decree required the development and implementation of a Financing and Cost Analysis Program (FCAP). The purpose of the Financing and Cost Analysis Program is to provide a process that routinely reviews and updates all financial components of operating and maintaining a Sewer system which includes annual budgets, capital improvement expenditures, etc. The Program was approved by EPA on October 15, 2021 and implemented by October 2022.

During this reporting period:

- Continued the formal development of the FCAP - FY 2025 and projections FY2026 – FY2030
- Continue Financing and Cost Analysis Program implementation
- Obtained additional program funding from WRDA
- Completed draft revisions to the original FCAP document for approval
- Assisted with a new bond evaluation and development of a CIP for sewer consent decree and water needs

During the next reporting period:

- Complete QA and submit revisions to the original FCAP document for EPA/MDEQ

approval

- Conduct FCAP training and transition CMOM responsibilities to Public Works staff
- Continue to assist the city with tracking and documenting key performance measures manually, and as available, through Cityworks
- Continue implementation of the FCAP annual re-evaluating the overall PWD Program budget based on the most current information
- Re-evaluate User rate structure needs for future bond programs
- Establish future capital budget requirements
- Complete QA and submit revisions to the original FCAP document for EPA/MDEQ approval

Table 4-9A. Implementation Schedule for Specific Financing & Cost Analysis Program Tasks

Program Task	Date of Implementation Initiation
Budget and Cost Analysis Component	Budget and cost analysis completed for FY 23 10/2022. Additional funding obtained from ARPA in 2022.
CIP Financing Component	CIP financing to be evaluated on an annual basis. CIP projected for FY 2023 & 2024
Life Cycle Cost Analysis Process Development	Implementation to be performed as part of the IMS Program implementation.
Adequacy of Customer Rates Evaluation	Customer rate increases (water/wastewater) enacted by the 2019 amendment to City Ordinances 25-40 & 25-41 to be reevaluated on annual basis.
FOG Control Program Related Fees Established	FOG Control Program enforcement and fees related to FOG Control Program established as part of its implementation phase.
All Program elements implemented/in-place	12 months from EPA approval of Program*

* *Depending on the approval date of this document, implementation of specific tasks may have already been initiated. Budgeting and planning components to be evaluated and assessed on a continual basis. Significant financial planning updates to be included as part of the City's Annual Report (pursuant to 26.b of the Consent Decree).*

Table 4-9B. Annual Financing and Cost Analysis Program Performance Measures

Performance Measure	Description	Calculation	Target Annual Value	Actual Annual Value
Meeting Minimum Required Debt Service Coverage Ratio (DCR)	Debt service coverage ratio measures the system's ability to pay its long-term debts. The minimum DCR will be as defined per City's bond covenant.	Value	≥ Minimum DCR	> 1.25

Adequate Financing for CMOM - Identified Capital Costs	City's capital improvement planning should be adequate to finance projects and O&M equipment identified as part of the CMOM programs	Value	Partially Funded	App. 200 Thousand For CMOM Updates/SOPS/FOG BMP/FSEs
Financing for SSO-Related CIP Projects	City's capital improvement planning should be adequate to finance projects associated with Sewer Groups 1 & 2	Value	Partially Funded	App. 5 Million
Routine Evaluation of Customer Rates	Annual review, evaluation, and revision (if necessary) to customer rates; Council approved rate increase in 2025	Value	Once per Year	9% increase in 2023; Awaiting 2024 Audit for new Bond application (50 Million)
Routine Program Evaluation	Annual review, evaluation, and revision (as necessary), to Program	Value	Once per Year	Completed

5.0 Consent Decree Progress Schedule

A Gantt chart indicating the overall progress of Consent Decree required activities and milestones for the Annual Report No. 6 is shown on the following pages.

Meridian Sewer CD Tasks (December 2025)

Consent Decree Effective Date: August 6, 2019

CD ASPECTS

Calendar Year (Blue)	2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030
Fiscal Year/Current City 3-Year GSA Contracts (Grey)	5 | 6 | 7 | 8 | 9 | 10
Month	O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S O N D Ja F M Ap Ma J Ju Au S

Program Management (PrG)

PrG Management, Reports, and Meetings

- Semi-Annual Reports (Due Jan 31, 20XX and July 31, 20XX) — 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 5 | 6Rev | 7
- Annual Reports (Due Feb 28, 20XX) — 4 | 5 | 6 | 7 | 8 | 9
- Consent Decree Monthly Meetings
- Quarterly Council Mtg CD Updates — Q
- Quarterly EPA/MDEQ CD Updates (Began in 2023) — Q
- Biweekly Team Meetings, between Consent Decree Monthly Mtgs (WCTS, WWTP, CMOM)

Wastewater Collection and Transmission System (WCTS)

Hwy 80 Trunk Line Sewer System Evaluation And Rehabilitation

- **Draft/Submit Highway 80 Trunk Line Work Plan** (Green Fill Indicates Completed)
- EPA Review & Approval
- **Draft/Submit Highway 80 Trunk Line Rehabilitation Plan**
- EPA Review & Approval — 13th
- Rehabilitation Plan Implementation - Design & Construction Projects
- - Phase 1 Highway 80 Trunk Line Repair Project (SC , Warranty expired)
- - Phase 2-A Highway Trunkline Repair Project (SC Feb 28, 2023, Warranty Period to Feb 28, 2024)
- - Phase 2-B Highway 80 Trunkline Repair Project (Awarded - Construct in 2025) — Bid — MDOT Permit Delay — Construction
- - Phase 3 Highway 80 Trunkline Repair Project (Mobile Corps/WRDA Sec. 219, Construction complete by 2027) — Letter Agreement — Design-Build — Construction

SewerBasin Studies

- **Draft/Submit Sewerbasin Prioritization Work Plan**
- EPA Review & Approval (3)
- **Draft/Submit Sewerbasin Prioritization Report** — 21st
- Develop / Update Sewer System Map (30 months)
- Sewerbasin Flow Monitoring (24 months minimum)
- Rainfall Monitoring (24 months minimum)
- Prioritize Sewerbasins (6 months)
- Prepare Prioritization Report (3 months)
- EPA Review & Approval (3 months) — 3 months
- **Sewer Group Evaluation Plan** — 12 months + — 24
- EPA Review & Approval (3 months) **APPROVED** — 3 months
- **Conduct SSES** — Waiting on New Bond $$ to Commence SSES/PSE
- Implement the Sanitary Sewer Evaluation Survey 2026-2027 — Sewer Group 1 and 2 Evaluation Survey (24 months) >>>>
- Implement the Pump Station Evaluations 2026-2027 — Pump Station Evaluation Survey (24 months) >>>>
- **Draft/Submit Sewerbasin Evaluation Report & Rehabilitation Plan (12 months following Sewer Group Evaluation Plan Assessments (SSES/PSE)**
- EPA Review & Approval (3 months)
- Rehabilitation Plan Implementation
- **Rehabilitation Plans for each Sewer Group (Group 3 Improvements by City)** — Design and Construct Sewer Group 1 Improvements
- Design & Construction of Improvements-Sewer Group 1 (144 Months after effective date: Aug 5, 2031)
- Draft/Submit Rehabilitation Report Sewer Group 1 (12 Months following completion of SG1 remedial measures)
- Design & Construction of Improvements-Sewer Group 2 (216 Months after effective date: Aug 5, 2037)
- Draft/Submit Rehabilitation Report Sewer Group 2 (12 Months following completion of SG2 remedial measures)

Other Sewerbasin Design and Construction Projects

- - 24-inch B Street and 22nd Avenue Sewer Improvements Project (21st to 23rd avenue) (Completed)
- - 54-Inch Sewer Line Replacement (Completed)
- - Annual Term Contract - Work Order No. 1 Medical District (Completed)
- - West Meridian Phase 1 Trunkline Repair Project (100% Design, Acquiring Easements (Greenfield Trust) — Greenfield Trust Easment Negotiations/Site Investigation/WPP/Final Spec for Construction/New Bond $$ to Advertise — Bid — Construction
- - Annual Term Contract - Work Order No. 2, D Street Sewer Repair (Completed)
- - Eastern Garden Pump Station Project (Property Acq./RR Permit) — Railroad Permit/Easements/New Bond $$ to Advertise — Bid — Construction
- - Annual Term Rebid Contract - 2 Years (Multiple projects focused on sewer failure and SSO location cleaning and repairs) — Issue Work Orders for Construction/Complete all Work Order Projects by June 30, 2026 to meet deadline of August, 2026
- - West Meridian Phase 2 Trunkline Repair Project (USACE Sec 219*/CDBG Grant**) — Letter Agreement — Planning/Design/Build — Construction
- Phase 2A USACE (WRDA) **In Design*** — Design — Bid — Construction
- Phase 2B (CDBG) **in Construction**** — Design Phase A/B/New Bond $$ to Advertise — Bid — Construction
- - B Street Sewer Line Rehabilitation **In Design (60%)**; Phase A/B — Ongoing Clearing/Clearing/WCTS Improvements
- - Miscellaneous Projects (Focal Easements Clearing, Heavy Line Cleaning, Pump Station Interim Rehab); **In Planning**

Chronic SSO Advanced Remote Monitoring Program

- Develop Initial SSO List w/ proposed remote monitoring locations
- EPA Review & Approval (3 months)
- Submit Updated Chronic SSO List w/ proposed remote monitoring locations
- EPA Review & Approval (3 months)
- Installation of Remote Monitoring Equipment
- Submit Updated Annual Chronic SSO Lists (**Annual Chronic SSO Report 4 approved/ EPA removed 6 chronic SSOs from List)** — 3 | 4 | 5 | 6 | 7 | 8 | 9
- Annual Chronic SSO Report - EPA Review & Approval / Implement Annual Remote Monitoring as required — 13th

Month No.	53 54 55 56 57 58 59 60 61 62 63 64 65 66 67 68 69 70 71 72 73 74 75 76 77 78 79 80 81 82 83 84 85 86 87 88 89 90 91 92 93 94 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 95 96 97 98 99 100 101 102 103 104 105 106 107 108 109 110 111 112 113 114 115 116 117 118 119 120 121
End of Year No.	5 — 6 — 7 — 8 — 9 — 10 — 11

Wastewater Treatment Plants (WWTPs)

Sewer Treatment System Corrective Action Plan (STSCAP)

SWWTP

- Draft/Submit Plan
- EPA Review & Approval
- Design & Construction of STSCAP (42 Months from Approval)
- STSCAP revised, as per City Letter Issued to DOJ/EPA/MDEQ on June 15, 2022)
- - SWWTP O&M Assistance
- - Miscellaneous SWWTP Plant Repairs and Improvements (Pumps, Blowers, Piping, Valves, Line Cleaning and Septage Station Plan, Grit Chamber Conveyance system Rehab, Power Monitor, EQ 4 Curtain, EQ 1 Dewatering/Sump Pump, etc.)
- - SWWTP Phase 1-A Rehab and Upgrades (Completed) — Construction
- SWWTP EQ Basins 2, 3, and 4 Sludge Solids Removal/Dewatering/Off-Site Soil Amendment (Completed) — Construction
- Copper Study (Agreed Order/Meridian Modification Request) (Completed)
- - WET Testing/Report due Oct. 31, 2023 — 31st
- - Chemical Translator Sampling/Report due Oct. 31, 2023; Submitted to MDEQ — 31st
- - Biological Translator Study (not needed)
- - MDEQ performing Chemical Translator Study/Draft NPDES Permit with Rationale to submit to EPA — EPA Review
- NPDES Permit Application Renewal (Completed)
- MS Power Water Use Agreement Revision -Submitted conformed agreement to the city and MS Power. (Completed)
- SWWTP Roof Project (Completed)

EWWTP

- EWWTP Lagoon Cover Replacement **(In Design)** — Design — Bid — Construct
- EWWTP Upgrades (PS, SBR Diffuser Sleeve and Air Valve Replacement) (**In Construction**) — Bid — Construction
- EWWTP Upgrades (PLC Software Update) (Completed) — Installed

Other Potential WWTP Work (in Planning) ***NO SCHEDULE***

- SWWTP Plant Evaluation/Property Acquisition — Planning - Old Versus New Plant Decision Long Term Plan for Replacement
- EWWTP Headworks — Planning
- SWWTP New Plant Improvements (Grit Chamber, Primary Clarifiers, Additional Secondary and Tertiary Clarifiers — Planning - 6 Million/New Bond?
- SWWTP Old Plant Improvements (Circular Clarifiers, Piping, Valves) New Bond Money $$ — Planning - 6 Million/New Bond ?

CMOM Programs

Draft/Submit Sewer Overflow Response Program (SORP) Revision 1

- EPA Review & Approval (3 months)
- Initiate and Implement SORP Training (Plan)
- Complete SORP SOPs (Plan)
- Develop List of PS SSOs (Plan)
- Develop List of potential PS SSOs in the event of Failure (Plan)
- Submit Rev. 1 and continue Implementation and Annual Updates of SORP/Present a training module to City — 12 mo. — Review — 12 mo. — Review — 12 mo. — Review — 12 mo. — Review — 12 mo. — Review — 12 mo. — Review — 12 mo. — Review
- Track KPIs/Include in Annual Reports (Plan)
- Provide support to the city for implementation of the new SSO electronic reporting system: NeT-SewerOverflow system

Draft/Submit Emergency Response Plan (ERP) Revision 1

- EPA Review & Approval (3 months)

Meridian Sewer CD Tasks (December 2025)

Consent Decree Effective Date: August 6, 2019

CD ASPECTS

Calendar Year (Blue)	2023 | 2024 | 2025 | 2026 | 2027 | 2028 | 2029 | 2030
Fiscal Year/Current City 3-Year GSA Contracts (Grey)	5 | 6 | 7 | 8 | 9 | 10
Month	O N D Ja F M Ap Ma J Ju Au S …
Month No.	53 54 55 56 57 58 59 60 61 62 63 64 … 121
End of Year No.	5 6 7 8 9 10 11

Capacity, Management , Operations and Maintenance Programs (CMOMs)

- Procure Video Conferencing at PWD Conference Room (Plan)
- Complete ERP SOP (Plan)
- Initiate and Implement ERP Training (Plan)
- All Program Elements Implemented/In Place
- Submit Rev. 1 and continue Implementation and Annual Updates of ERP/Present a training module to City — 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan)
- Provide support to the city under specific task orders

Draft/Submit Information Management Systems Program (IMS) Revision 1

- EPA Review & Approval (3 months)
- Implement Geographic Information System (GIS) Map of the entire WCTS
- EPA Review & Approval GIS Map (3 months) — 15th
- Submit Rev. 1 and continue Implementation and Annual Updates of IMS/Present a training module to City — Review … 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Provide support to the city for training and cloud maintenance

Draft/Submit Sewer Mapping Program (SMP) Revision 1

- EPA Review & Approval (3 months)
- Initiate and Implement electronic mapping of each Basin in the WCTS
- Procure GIS Software (Plan)
- Finalize Data Dictionary (Plan)
- Develop System to include display of Streets/Addresses, Water Bodies, and Political Boundaries (Plan)
- Develop Standardize Project Specs for City's Construction Projects (Plan) — 12 mo. … Up
- Develop Sewer Basin Layer (Plan)
- Develop Sewer Mapping SOPs (Plan)
- Create FOG establishment Layer (Plan)
- Capture assets in the electronic database in Sewer Basin Prioritization Work — 12 mo. … Review
- Submit Rev. 1 and continue Implementation and Annual Updates of SMP/Present a training module to City — 12 mo. … Up
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Provide support to the city under specific task orders

Draft/Submit Gravity Sewer System Operations & Maintenance Program (GSSOMP) Revision 1

- EPA Review & Approval (3 months)
- Initiate and Implement GSSOMP
- Develop City's Gravity Sewer Design Standards (Plan)
- Provide Location of FOCAL Easements (Plan)
- Initiate Training (Plan)
- Develop SOPS (Plan)
- All Program Elements Implemented/In Place (Upon Approval of Sewer Group Evaluation Plan)
- Submit Rev. 1 and continue Implementation and Annual Updates of GSSOMP/Present a training module to City — Review … 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Provide support to the city under specific task orders

Draft/Submit Pump Station & Force Main Operations & Maintenance Program (PSFMOMP)

- EPA Review & Approval (3 months)
- Develop City's PS and FM Design Standards (Plan)
- Classify each PS by Risk: High, Medium or Low Risk (Plan)
- Initiate Program Training and Implementation Plan (Plan)
- Develop SOPS (Plan)
- Develop/Implement Remote Monitoring System
- - - Pump Station Monitoring System Project (Completed) — Construction
- All Program Elements Implemented/In Place (Plan)
- Submit Rev. 1 and continue Implementation and Annual Updates of PSFMOMP/Present a training module to City — Review … 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Provide support to the city under specific task orders

Draft/Submit Fats, Oils & Grease Control Program (FOGP)

- EPA Review & Approval (3 months)
- Perform FOG Characterization Study (Plan)
- Establish Staffing (Technical and Legal) and Equipment Requirements (Plan)
- Develop Design and Construction Standards (Plan)
- Develop "Living" List of FOG generators (Include Process Descriptions and est. average daily FOG generation) (Plan)
- Establish FOG Control Training Component (Plan)
- Develop Construction and Compliance Inspection protocols (Plan)
- Enactment of FOG Ordinance (CD)
- Develop FOG control device BMPs (Plan) FMERG — 15th
- Develop Compliance Assistance Program for FOG Generators (Plan) FMERG — 15th
- Develop a public education/outreach component targeting non-commercial/residential customers (Plan) FMERG — 15th
- All Program Elements Implemented/In Place (Plan) — 15th
- Submit Rev. 1 and continue Implementation and Annual Updates of FOGP/Present a training module to City — Review … 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Provide support services for FOG implementation (Inspections, BMP Software Development, permit development)

Draft/Submit Financing & Cost Analysis Program (FCAP)

- EPA Review & Approval (3 months)
- Process and Schedule of Implementation to Perform Budget and Cost Analysis (CD)
- Process and Schedule of Implementation to Evaluate CIP Financing Annually (CD) — 15th … 12 mo. … 15th … 12 mo. … 15th
- Process and Schedule of Implementation to Develop Life Cycle Costs Analysis Process as part of IMS Implementation (CD) — 15th
- Process and Schedule of Implementation to Evaluate Customer Rates (Water/Sewer) Annually (CD) — 15th … 12 mo. … 15th … 12 mo. … 15th
- Establish FOG Control Program Fees as per FOG Control Program Implementation (Plan) — 15th
- All Program Elements Implemented/In Place (CD)
- Update Significant Financial Planning Elements as part of City's Annual Report (Plan) — 15th … 12 mo. … 15th … 12 mo. … 15th … 12 mo. … 15th … 12 mo. … 15th … 12 mo. … 15th … 12 mo. … 15th … 12 mo.
- Submit Rev. 1 and continue Implementation and Annual Updates of FCAP/Present a training module to City — Review … 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Provide support services for FCAP implementation (CIP, Budgets, Rates)

Draft/Submit Legal Support Program (LSP)

- EPA Review & Approval (3 months)
- Develop amended Water and Sewer Ordinance (Plan)
- Adoption of amended Water and Sewer Ordinance by City Council (Plan) — 20th
- PLERG
- All Program Elements Implemented/In Place (CD) — 3rd
- Submit Rev. 1 and continue Implementation and Annual Updates of LSP/Present a training module to City — Review … 12 mo. … Review
- Track KPIs/Include in Annual Reports (Plan) — Up … Up
- Present FOG ordinance revision recommendations to the City (BMP Software, Permits, other)