San Antonio Water System

February 12, 2018

U.S. Department of Justice
Environmental Enforcement Section
Environment and Natural Resources Division
P.O. Box 7611
Washington, D.C. 20044-7611
Reference: DOJ Case no. [90-5-1-1-09215]

Via U.S. Certified Mail
RRR# 7015 1520 0000 7713 8955

Received
MAR 20 2018
6EN-W

U.S. Environmental Protection Agency, Region VI
Chief, Water Enforcement Branch (6EN-W)
Compliance Assurance and Enforcement Division
1445 Ross Avenue
Dallas, TX 75202-2733

Via U.S. Certified Mail
RRR# 7015 1520 0000 7713 8962

U.S. Environmental Protection Agency, Region VI
Attn: Ms. Judy Edelbrock (6EN-W)
Environmental Protection Specialist
Enforcement Branch
1445 Ross Avenue
Dallas, TX 75202-2733

Via U.S. Certified Mail
RRR#7015 1520 0000 7713 8962

Mark Walters
Office of the Attorney General
State of Texas
Environmental Protection Division
P.O. Box 12548
Austin, TX 78711-2548
Reference: AG # 082508284

Via U.S. Certified Mail
RRR#7015 1520 0000 7713 8979

Order Compliance Team
Enforcement Division, MC 224
Texas Commission on Environmental Quality
P.O. Box 13087
Austin, TX 78711-3087

Via U.S. Certified Mail
RRR#7015 1520 0000 7713 8986

Water Section Manager
San Antonio Regional Office
Texas Commission on Environmental Quality
14250 Judson Road
San Antonio, TX 77233-4480

Via U.S. Certified Mail
RRR#7015 1520 0000 7713 8993

2800 U.S. Hwy. 281 North • P.O. Box 2449 • San Antonio, TX •78298-2449 • www.saws.org

Re: Non Material Modification to Consent Decree
Phase II Early Action Program

Consent Decree Date of Lodging: July 23, 2013
Consent Decree Date of Entry: October 15, 2013
CA No. 5:13-cv-00666-DAE, United States of America and State of Texas v. San Antonio Water System, in the United States District Court for the Western District of Texas, San Antonio Division

Dear Sir/Madam:

Section 110 of the Consent Decree (CD) provides that the non-material terms of the CD may be modified by a written agreement signed by all of the Parties. San Antonio Water System (SAWS) has identified changed conditions that require alterations to the Phase II Early Action Program (EAP) that is described in the October 27, 2015 Revision 1 submittal of Phase II Early Action Program. The requested modifications are non-material changes to the CD (as defined in paragraph 110 of the CD) and will not affect conformance with CD performance objectives or final completion deadlines.

Phase II Early Action Program Revision 1, Section 4.0 Detailed Information on Proposed Phase II EAP Work provides four tables, including:

4-1: SD Condition Remediation
4-2: Large Diameter (LD) Condition Remediation

Table 4-1 lists the various sewer assets to be remediated under the Phase II Early Action Program SD Condition Remediation. These assets are divided into three projects. Projects 9 and 10 have been completed. Project 11, due for completion on July 22, 2018, contains 152 small diameter pipe segments. A total of 99 of these assets have been remediated as of the date of this letter, leaving 53 still in progress.

Ongoing investigative work has identified other, more critical sewer assets for condition remediation since Table 4-1 was compiled in 2015. These assets were placed at the top of the remediation list due to the critical nature of their defects. These more critical assets have been selected for inclusion in Project 11, postponing the 53 incomplete original assets. This non-material modification changes neither the number of assets to be remediated nor the total mileage to be remediated.

Table 4-2 lists the various assets to be remediated for condition defects under Phase II Early Action Program Large Diameter (LD) Condition Remediation. These 18 assets are grouped into Project 12 – 2020 LD Rehab Program. They are scheduled for completion by July 22, 2020. Ten (10) of these assets have been remediated.

Ongoing investigative work has identified other, more critical assets for condition remediation since Table 4-2 was compiled in 2015. These assets were placed at the top of the remediation list due to the critical nature of their defects. Three (3) of these new, more critical assets are being added to Project 12, postponing the eight (8) incomplete original assets. These three new assets have a combined length similar to the combined length of the eight assets removed from Project 12, so the total mileage remediated does not change.

A draft Agreement to Modify Consent Decree is enclosed for your consideration. The narrative and revised Tables 4-1 and 4-2 are included as Attachments A, B, and C to the draft Agreement. If you have any questions or need clarification concerning the information provided, please contact me directly at 210-233-3747.

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.

Sincerely,

Jeffrey J. Haby, P.E.
Vice President, Production & Treatment

Enclosures 4/as stated

AGREEMENT TO MODIFY CONSENT DECREE

WHEREAS, on July 23, 2013, a Consent Decree between the San Antonio Water System ("SAWS"), the United States of America, and the State of Texas (collectively referred to as the "Parties" or individually as a "Party") was lodged in Civil Action No. 5:13-cv-00666-DAE: United States of America and State of Texas v. San Antonio Water System, in the United States District Court for the Western District of Texas, San Antonio Division (the "Consent Decree");

WHEREAS, on October 15, 2013, the United States District Court for the Western District of Texas signed and entered the Consent Decree;

WHEREAS, Paragraph 21 of the Consent Decree provides that SAWS shall submit a Phase II Early Action Program no later than 24 months following Date of Lodging;

WHEREAS, SAWS submitted a Phase II Early Action Program on July 22, 2015 in accordance with the Consent Decree and the Early Action Program Phase II includes in Table 4-1 a list of specific small diameter pipe segments to be remediated for condition defects in Project 11, and a list in Table 4-2 of large diameter pipe segments to be remediated for condition defects in Project 12;

WHEREAS, Paragraph 110 of the Consent Decree provides that the non-material terms of the Consent Decree may be modified only by a subsequent written agreement signed by all the Parties;

WHEREAS, SAWS has determined that 53 small diameter pipe segments need to be remediated for condition defects sooner than 53 pipe segments listed as part of Project 11 in Table 4-1 of Early Action Program Phase II;

WHEREAS, SAWS has determined that 3 large diameter pipe segments need to be remediated for condition defects sooner than 8 pipe segments listed as part of Project 12 in Table 4-2 of Early Action Program Phase II;

WHEREAS, SAWS has provided a brief explanation of each of the modifications listed above in Attachment A to this Agreement;

WHEREAS, SAWS requested that Tables 4-1, and 4-2 of the Phase II Early Action Program be modified to accommodate the substitutions listed above;

NOW, THEREFORE, THE PARTIES TO THE CONSENT DECREE AGREE AS FOLLOWS:

1. Project Phase II EAP: Project 11 – 2017 SD Rehab Program in Table 4-1: SD Condition Remediation of Phase II Early Action Program Revision 1: October 27, 2015 is modified by the removal of 53 identified pipe segments and their replacement with 53 other named pipe segments as listed in Attachment A. There is no change in the mileage to be remediated in Project 11 as a result of these substitutions. The modified Table 4-1 is included as Attachment B.
2. Project Phase II EAP: Project 12 – 2020 LD Rehab Program in Table 4-2: Large Diameter (LD) Condition Remediation of Phase II Early Action Program Revision 1: October 27, 2015 is modified by the removal of 8 identified pipe segments and their replacement with 3 other named pipe segments as listed in Attachment A. There is no change in the mileage to be remediated in Project 12 as a result of these substitutions. The modified Table 4-2 is included as Attachment C.
3. The Parties agree that the modifications to the Consent Decree made in this Agreement are non-material changes.
4. The undersigned agree to the terms of this Agreement to Modify Consent Decree on behalf of the respective Party for whom each of the undersigned executes this Agreement.

SAN ANTONIO WATER SYSTEM

By: _____ Date: 2-12-2018

Jeffrey J. Haby, P.E.
Vice President, Production & Treatment

UNITED STATES

By:_____ Date:_____

John Blevins,
Director, Compliance Assurance and
Enforcement Division
U.S. Environmental Protection Agency

By:_____ Date:_____

Mark Pollins
Director, Water Enforcement Division
Office of Enforcement and Compliance and
Compliance Assurance (OECA)
U.S. Environmental Protection Agency

STATE OF TEXAS

By:_____ Date:_____

Ramiro Garcia, Jr.
Deputy Director, Office of Compliance and
Enforcement
Texas Commission of Environmental Quality

ATTACHMENT A
Proposed Phase II EAP Condition Remediation Modification Summary

Summary of Alterations to Phase II EAP SD Condition Remediation Projects:

Project 11 – 2017 SD Rehab Program:

Project 11 consists of 152 identified pipe segments totaling 8.5 miles to be remediated for condition defects by July 22, 2018. New assets have been identified with more urgent condition remediation needs since the Project 11 list was developed in 2015. These more urgent repairs were moved to the top of the priority list.

A total of 53 pipe segments from the original Project 11 list are being removed from Project 11 and replaced with 53 pipe segments in more urgent need of repair. Work will continue on the 53 segments originally part of Project 11 and all will be completed within the Consent Decree timeline. The number of pipe segments and mileage to be rehabilitated in Project 11 remains the same. The list of segments to be removed and their replacements are presented below. Table 4-1: SD Condition Remediation in EAP Phase II is modified to show the new replacement assets.

Assets Removed		Assets Added	
1061454	976875	1040142	3370832
998121	2390098	2390956	974540
1053855	967770	995826	1043231
966396	967382	976424	983325
1066191	983583	1001432	964964
973912	986269	977351	1005995
994979	968124	1030442	1009013
1048700	964215	970721	1007739
974102	987776	987331	970340
1053067	2389328	984414	966514
967668	976099	1040991	1044143
965960	977637	996445	1021091
992368	979100	963435	1008111
969018	979263	980163	3370857
969020	979715	1007740	974828
969019	980369	977763	978018
968107	978825	1040820	990940
2565190	990587	982972	1009900
991929	977516	984426	1000057
1052302	981053	1009409	2460083
983697	980916	996371	1023238
984484	990588	984910	968999
984239	990586	1050719	1031420
978984	979756	3029440	977954
989248	978590	976569	964346
975759	999263	967511	989775
975388		969195	

Summary of Alterations to Phase II EAP LD Condition Remediation Projects:

Project 12 – 2020 LD Rehab Program:

Project 12 consists of 18 identified pipe segments totaling 0.7 miles to be remediated for condition defects by July 22, 2020. New assets have been identified with more urgent condition remediation needs since the Project 12 list was developed in 2015. These more urgent repairs were moved to the top of the priority list.

A total of 8 pipe segments totaling 0.3 miles from the original Project 12 list are being removed from Project 12. Three (3) pipe segments totaling 0.3 miles are being added to Project 12 to replace the segments removed. Each of the three segments added are in more urgent need of repair than the ones originally included in Project 12. The mileage to be rehabilitated in Project 12 remains the same. Work will continue on the 8 segments originally part of Project 12 and all will be completed within the Consent Decree timeline. The list of segments to be removed and their replacements are presented below. Table 4-2: Large Diameter (LD) Condition Remediation in EAP Phase II is modified to show the new replacement assets.

Assets Removed		Assets Added
980656	988418	978191
1002970	989798	1000224
990724	990479	989347
988314	988355	

ATTACHMENT B
Table 4-1: SD Condition Remediation

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 9 - 2015 SD Rehab	1018276	279.5	CCTV	4117	E - VERY POOR
Project 9 - 2015 SD Rehab	1018500	300.3	CCTV	0000	E - VERY POOR
Project 9 - 2015 SD Rehab	1018507	298.9	CCTV	2100	E - VERY POOR
Project 9 - 2015 SD Rehab	995205	262.42	CCTV	4422	E - VERY POOR
Project 9 - 2015 SD Rehab	1016673	341.31	CCTV	4135	E - VERY POOR
Project 9 - 2015 SD Rehab	1022831	280	CCTV	5B3G	E - VERY POOR
Project 9 - 2015 SD Rehab	988874	42	CCTV	5100	D - POOR
Project 9 - 2015 SD Rehab	1052864	148.2	CCTV	5111	D - POOR
Project 9 - 2015 SD Rehab	988451	352	CCTV	5300	E - VERY POOR
Project 9 - 2015 SD Rehab	997797	216.62	CCTV	5231	D - POOR
Project 9 - 2015 SD Rehab	988154	230	CCTV	0000	E - VERY POOR
Project 9 - 2015 SD Rehab	2388896	445	CCTV	4121	E - VERY POOR
Project 9 - 2015 SD Rehab	1059706	300.4	CCTV	423C	D - POOR
Project 9 - 2015 SD Rehab	1053064	375.7	CCTV	5145	E - VERY POOR
Project 9 - 2015 SD Rehab	1054001	280.5	CCTV	5249	E - VERY POOR
Project 9 - 2015 SD Rehab	979382	405	CCTV	5A41	E - VERY POOR
Project 9 - 2015 SD Rehab	990173	170	CCTV	5C32	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 9 - 2015 SD Rehab	974626	318.5	CCTV	5231	D - POOR
Project 9 - 2015 SD Rehab	982808	432	CCTV	4100	E - VERY POOR
Project 9 - 2015 SD Rehab	984460	395.5	CCTV	5243	E - VERY POOR
Project 9 - 2015 SD Rehab	984500	384.7	CCTV	4931	E - VERY POOR
Project 9 - 2015 SD Rehab	1030977	399.9	CCTV	5342	D - POOR
Project 9 - 2015 SD Rehab	966956	265	CCTV	5E3V	E - VERY POOR
Project 9 - 2015 SD Rehab	978880	50	CCTV	5800	E - VERY POOR
Project 9 - 2015 SD Rehab	979432	400	CCTV	5942	E - VERY POOR
Project 9 - 2015 SD Rehab	988583	312	CCTV	5834	E - VERY POOR
Project 9 - 2015 SD Rehab	998516	300	CCTV	2100	E - VERY POOR
Project 9 - 2015 SD Rehab	976915	272	CCTV	4231	D - POOR
Project 9 - 2015 SD Rehab	985734	20	CCTV	3100	D - POOR
Project 9 - 2015 SD Rehab	987171	319	CCTV	5200	D - POOR
Project 9 - 2015 SD Rehab	967319	154	CCTV	5141	E - VERY POOR
Project 9 - 2015 SD Rehab	988132	381.9	CCTV	5B44	E - VERY POOR
Project 9 - 2015 SD Rehab	988841	400	CCTV	0000	D - POOR
Project 9 - 2015 SD Rehab	989123	400	CCTV	5142	E - VERY POOR
Project 9 - 2015 SD Rehab	977363	297.2	CCTV	524A	D - POOR

Table 4-1: SD Condition Remediation					
Project Name	**Asset ID**	**Pipe Length (Feet)**	**Investigative Technique**	**NASSCO PACP Quick Rating**	**SAWS Condition Assessment Category**
Project 9 - 2015 SD Rehab	965113	213.1	CCTV	5143	D - POOR
Project 9 Total Mileage		***2.0***			
Project 10 - 2016 SD Rehab	976142	120	CCTV	0000	D - POOR
Project 10 - 2016 SD Rehab	976441	304	CCTV	0000	D - POOR
Project 10 - 2016 SD Rehab	986242	360	CCTV	5845	E - VERY POOR
Project 10 - 2016 SD Rehab	998571	400	CCTV	524A	E - VERY POOR
Project 10 - 2016 SD Rehab	998572	105	CCTV	4911	E - VERY POOR
Project 10 - 2016 SD Rehab	1008388	170	CCTV	5243	E - VERY POOR
Project 10 - 2016 SD Rehab	1049621	370.16	CCTV	5741	E - VERY POOR
Project 10 - 2016 SD Rehab	968162	300.1	CCTV	4A31	E - VERY POOR
Project 10 - 2016 SD Rehab	979131	310	CCTV	514A	E - VERY POOR
Project 10 - 2016 SD Rehab	974073	398	CCTV	3121	D - POOR
Project 10 - 2016 SD Rehab	977790	286	CCTV	5A00	E - VERY POOR
Project 10 - 2016 SD Rehab	978170	161.1	CCTV	4700	D - POOR
Project 10 - 2016 SD Rehab	985918	276	CCTV	453I	D - POOR
Project 10 - 2016 SD Rehab	969370	274	CCTV	3712	D - POOR
Project 10 - 2016 SD Rehab	977674	270.17	CCTV	4100	D - POOR
Project 10 - 2016 SD Rehab	972552	36	CCTV	5400	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 10 - 2016 SD Rehab	997793	99	CCTV	5343	E - VERY POOR
Project 10 - 2016 SD Rehab	997794	347	CCTV	5141	E - VERY POOR
Project 10 - 2016 SD Rehab	965963	497	CCTV	534C	E - VERY POOR
Project 10 - 2016 SD Rehab	966814	42	CCTV	5544	E - VERY POOR
Project 10 - 2016 SD Rehab	1049884	335	CCTV	524B	E - VERY POOR
Project 10 - 2016 SD Rehab	977764	239	CCTV	5100	E - VERY POOR
Project 10 - 2016 SD Rehab	976961	300	CCTV	5634	E - VERY POOR
Project 10 - 2016 SD Rehab	966825	400	CCTV	5100	D - POOR
Project 10 - 2016 SD Rehab	971760	408.1	CCTV	5332	E - VERY POOR
Project 10 - 2016 SD Rehab	1015454	432	CCTV	5631	E - VERY POOR
Project 10 - 2016 SD Rehab	964106	186.6	CCTV	5334	E - VERY POOR
Project 10 - 2016 SD Rehab	985761	370	CCTV	5141	E - VERY POOR
Project 10 - 2016 SD Rehab	970829	344.43	CCTV	4234	E - VERY POOR
Project 10 - 2016 SD Rehab	989794	354	CCTV	5D36	E - VERY POOR
Project 10 - 2016 SD Rehab	1017560	329.18	CCTV	5242	E - VERY POOR
Project 10 - 2016 SD Rehab	1015003	235.78	CCTV	523Q	E - VERY POOR
Project 10 - 2016 SD Rehab	990546	314	CCTV	5542	E - VERY POOR
Project 10 - 2016 SD Rehab	1023103	468	CCTV	5443	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 10 - 2016 SD Rehab	1048511	254	CCTV	5300	E - VERY POOR
Project 10 - 2016 SD Rehab	1059560	114	CCTV	5A00	E - VERY POOR
Project 10 - 2016 SD Rehab	1059558	359	CCTV	3121	E - VERY POOR
Project 10 - 2016 SD Rehab	1059559	395	CCTV	4132	D - POOR
Project 10 - 2016 SD Rehab	1030987	302.7	CCTV	3200	D - POOR
Project 10 - 2016 SD Rehab	991306	128	CCTV	5A31	E - VERY POOR
Project 10 - 2016 SD Rehab	991407	337.7	CCTV	4100	E - VERY POOR
Project 10 - 2016 SD Rehab	2406174	153	CCTV	2700	E - VERY POOR
Project 10 - 2016 SD Rehab	998276	286	CCTV	5100	D - POOR
Project 10 - 2016 SD Rehab	980119	288	CCTV	524H	D - POOR
Project 10 - 2016 SD Rehab	986743	26	CCTV	5143	D - POOR
Project 10 - 2016 SD Rehab	986043	57.5	CCTV	5545	D - POOR
Project 10 - 2016 SD Rehab	1053666	215	CCTV	5341	E - VERY POOR
Project 10 - 2016 SD Rehab	1050991	273	CCTV	5531	E - VERY POOR
Project 10 - 2016 SD Rehab	1058017	216	CCTV	0000	E - VERY POOR
Project 10 - 2016 SD Rehab	978327	35	CCTV	5431	D - POOR
Project 10 - 2016 SD Rehab	1059511	357	CCTV	5343	E - VERY POOR
Project 10 - 2016 SD Rehab	965159	322	CCTV	5131	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 10 - 2016 SD Rehab	966128	301	CCTV	4131	E - VERY POOR
Project 10 - 2016 SD Rehab	972207	403	CCTV	5331	E - VERY POOR
Project 10 - 2016 SD Rehab	983959	475	CCTV	3321	E - VERY POOR
Project 10 - 2016 SD Rehab	963955	403	CCTV	5100	E - VERY POOR
Project 10 - 2016 SD Rehab	965105	130	CCTV	5641	E - VERY POOR
Project 10 - 2016 SD Rehab	965407	320	CCTV	5242	E - VERY POOR
Project 10 - 2016 SD Rehab	967227	388	CCTV	4300	D - POOR
Project 10 - 2016 SD Rehab	974377	136	CCTV	4331	E - VERY POOR
Project 10 - 2016 SD Rehab	975880	155	CCTV	5247	D - POOR
Project 10 - 2016 SD Rehab	979317	170	CCTV	514A	E - VERY POOR
Project 10 - 2016 SD Rehab	979318	354.6	CCTV	5441	E - VERY POOR
Project 10 - 2016 SD Rehab	2645254	191	CCTV	5142	D - POOR
Project 10 - 2016 SD Rehab	1064323	434	CCTV	5543	E - VERY POOR
Project 10 - 2016 SD Rehab	1066026	372.4	CCTV	5641	E - VERY POOR
Project 10 - 2016 SD Rehab	996416	400	CCTV	5321	E - VERY POOR
Project 10 - 2016 SD Rehab	996958	400	CCTV	5600	E - VERY POOR
Project 10 - 2016 SD Rehab	977299	358	CCTV	1100	D - POOR
Project 10 - 2016 SD Rehab	1054101	425.1	CCTV	5443	D - POOR

Table 4-1: SD Condition Remediation					
Project Name	**Asset ID**	**Pipe Length (Feet)**	**Investigative Technique**	**NASSCO PACP Quick Rating**	**SAWS Condition Assessment Category**
Project 10 - 2016 SD Rehab	1064687	274.3	CCTV	5442	D - POOR
Project 10 - 2016 SD Rehab	964963	395.7	CCTV	533N	D - POOR
Project 10 - 2016 SD Rehab	977754	383	CCTV	533C	E - VERY POOR
Project 10 - 2016 SD Rehab	987649	374	CCTV	5223	E - VERY POOR
Project 10 - 2016 SD Rehab	972720	150	CCTV	5B31	E - VERY POOR
Project 10 - 2016 SD Rehab	977721	374	CCTV	5100	D - POOR
Project 10 - 2016 SD Rehab	983246	425	CCTV	5245	E - VERY POOR
Project 10 - 2016 SD Rehab	968248	172	CCTV	5237	E - VERY POOR
Project 10 - 2016 SD Rehab	996488	436.4	CCTV	0000	E - VERY POOR
Project 10 - 2016 SD Rehab	999858	385.5	CCTV	413C	E - VERY POOR
Project 10 - 2016 SD Rehab	1009556	198.1	CCTV	5442	E - VERY POOR
Project 10 - 2016 SD Rehab	999444	403	CCTV	3515	E - VERY POOR
Project 10 - 2016 SD Rehab	982856	327	CCTV	5B4E	E - VERY POOR
Project 10 - 2016 SD Rehab	984288	325	CCTV	5145	E - VERY POOR
Project 10 - 2016 SD Rehab	992977	107.5	CCTV	5431	E - VERY POOR
Project 10 - 2016 SD Rehab	993309	408.3	CCTV	5C3B	E - VERY POOR
Project 10 - 2016 SD Rehab	1064512	385	CCTV	5141	E - VERY POOR
Project 10 - 2016 SD Rehab	1065855	61	CCTV	3200	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 10 - 2016 SD Rehab	1066085	91.43	CCTV	5241	E - VERY POOR
Project 10 - 2016 SD Rehab	3131583	192.95	CCTV	5441	E - VERY POOR
Project 10 - 2016 SD Rehab	1064483	191.9	CCTV	5141	E - VERY POOR
Project 10 - 2016 SD Rehab	1066211	195	CCTV	5142	E - VERY POOR
Project 10 - 2016 SD Rehab	1064397	429	CCTV	5443	E - VERY POOR
Project 10 - 2016 SD Rehab	1065482	484	CCTV	5311	D - POOR
Project 10 - 2016 SD Rehab	1066154	259	CCTV	3521	D - POOR
Project 10 - 2016 SD Rehab	1053442	357.8	CCTV	564X	E - VERY POOR
Project 10 - 2016 SD Rehab	997437	217	CCTV	5200	D - POOR
Project 10 - 2016 SD Rehab	987527	350	CCTV	5347	D - POOR
Project 10 - 2016 SD Rehab	1049643	262	CCTV	5A11	E - VERY POOR
Project 10 - 2016 SD Rehab	994794	341	CCTV	5248	D - POOR
Project 10 - 2016 SD Rehab	994834	341	CCTV	5141	D - POOR
Project 10 - 2016 SD Rehab	994835	100	CCTV	0000	D - POOR
Project 10 - 2016 SD Rehab	994836	185.5	CCTV	574A	E - VERY POOR
Project 10 - 2016 SD Rehab	1050943	259.4	CCTV	5941	D - POOR
Project 10 - 2016 SD Rehab	1050298	92.8	CCTV	4600	D - POOR
Project 10 - 2016 SD Rehab	1050147	290.5	CCTV	574D	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 10 - 2016 SD Rehab	2389831	347	CCTV	413Z	E - VERY POOR
Project 10 - 2016 SD Rehab	975233	295	CCTV	534H	E - VERY POOR
Project 10 - 2016 SD Rehab	970998	148.6	CCTV	5141	E - VERY POOR
Project 10 - 2016 SD Rehab	2388845	220	CCTV	5200	E - VERY POOR
Project 10 - 2016 SD Rehab	966729	356	CCTV	5A3J	E - VERY POOR
Project 10 - 2016 SD Rehab	972943	405	CCTV	5100	E - VERY POOR
Project 10 - 2016 SD Rehab	974353	321.7	CCTV	413Z	E - VERY POOR
Project 10 - 2016 SD Rehab	964987	260.2	CCTV	5D41	E - VERY POOR
Project 10 - 2016 SD Rehab	965978	316	CCTV	5H3K	E - VERY POOR
Project 10 - 2016 SD Rehab	966235	323.3	CCTV	3P22	E - VERY POOR
Project 10 - 2016 SD Rehab	1065312	302.2	CCTV	3300	E - VERY POOR
Project 10 - 2016 SD Rehab	976729	287	CCTV	5631	E - VERY POOR
Project 10 - 2016 SD Rehab	1064066	400	CCTV	4A3C	E - VERY POOR
Project 10 - 2016 SD Rehab	968829	384	CCTV	5E41	E - VERY POOR
Project 10 - 2016 SD Rehab	973818	83.5	CCTV	552B	E - VERY POOR
Project 10 - 2016 SD Rehab	977441	400	CCTV	5125	E - VERY POOR
Project 10 - 2016 SD Rehab	968211	270	CCTV	4200	E - VERY POOR
Project 10 - 2016 SD Rehab	977365	299	CCTV	584A	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	**Asset ID**	**Pipe Length (Feet)**	**Investigative Technique**	**NASSCO PACP Quick Rating**	**SAWS Condition Assessment Category**
Project 10 - 2016 SD Rehab	967591	373.6	CCTV	5A3B	E - VERY POOR
Project 10 - 2016 SD Rehab	975858	320	CCTV	5100	E - VERY POOR
Project 10 - 2016 SD Rehab	1065462	241	CCTV	5232	E - VERY POOR
Project 10 - 2016 SD Rehab	967890	310	CCTV	3B23	E - VERY POOR
Project 10 - 2016 SD Rehab	972524	358	CCTV	5144	E - VERY POOR
Project 10 - 2016 SD Rehab	972621	338	CCTV	5400	E - VERY POOR
Project 10 - 2016 SD Rehab	966008	340	CCTV	1100	D - POOR
Project 10 Total Mileage		***7.1***			
Project 11 - 2017 SD Rehab	1040142	350	CCTV	5245	D - POOR
Project 11 - 2017 SD Rehab	977097	480	CCTV	5341	E - VERY POOR
Project 11 - 2017 SD Rehab	1063763	325.7	CCTV	5443	E - VERY POOR
Project 11 - 2017 SD Rehab	984896	304.1	CCTV	5842	E - VERY POOR
Project 11 - 2017 SD Rehab	1024306	348.24	CCTV	5141	E - VERY POOR
Project 11 - 2017 SD Rehab	987769	300	CCTV	5211	E - VERY POOR
Project 11 - 2017 SD Rehab	996623	350	CCTV	5143	E - VERY POOR
Project 11 - 2017 SD Rehab	2390956	13	CCTV	5100	D - POOR
Project 11 - 2017 SD Rehab	995826	350	CCTV	5600	E - VERY POOR
Project 11 - 2017 SD Rehab	995535	346.6	CCTV	524C	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 11 - 2017 SD Rehab	983245	529.1	CCTV	5546	E - VERY POOR
Project 11 - 2017 SD Rehab	984077	300	CCTV	5441	E - VERY POOR
Project 11 - 2017 SD Rehab	994741	419.1	CCTV	594A	E - VERY POOR
Project 11 - 2017 SD Rehab	994782	285.3	CCTV	534A	E - VERY POOR
Project 11 - 2017 SD Rehab	1058724	228.1	CCTV	5A43	E - VERY POOR
Project 11 - 2017 SD Rehab	979232	346	CCTV	5100	E - VERY POOR
Project 11 - 2017 SD Rehab	979741	354.2	CCTV	5200	E - VERY POOR
Project 11 - 2017 SD Rehab	987360	350	CCTV	5246	E - VERY POOR
Project 11 - 2017 SD Rehab	976424	350	CCTV	5231	D - POOR
Project 11 - 2017 SD Rehab	970433	138.3	CCTV	5200	E - VERY POOR
Project 11 - 2017 SD Rehab	1029186	249	CCTV	5300	E - VERY POOR
Project 11 - 2017 SD Rehab	970432	355.4	CCTV	5931	E - VERY POOR
Project 11 - 2017 SD Rehab	1001432	300	CCTV	5133	D - POOR
Project 11 - 2017 SD Rehab	977351	233.2	CCTV	5141	E - VERY POOR
Project 11 - 2017 SD Rehab	1030442	307	CCTV	5143	E - VERY POOR
Project 11 - 2017 SD Rehab	2795700	205	CCTV	544D	E - VERY POOR
Project 11 - 2017 SD Rehab	970721	202.3	CCTV	5100	D - POOR
Project 11 - 2017 SD Rehab	987331	400	CCTV	5100	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 11 - 2017 SD Rehab	984414	390	CCTV	5142	D - POOR
Project 11 - 2017 SD Rehab	990652	378	CCTV	5D4D	E - VERY POOR
Project 11 - 2017 SD Rehab	983560	400	CCTV	5943	E - VERY POOR
Project 11 - 2017 SD Rehab	984398	290	CCTV	5542	E - VERY POOR
Project 11 - 2017 SD Rehab	976900	112.1	CCTV	5645	D - POOR
Project 11 - 2017 SD Rehab	977100	275	CCTV	5B4C	D - POOR
Project 11 - 2017 SD Rehab	979043	364	CCTV	5C41	D - POOR
Project 11 - 2017 SD Rehab	1001610	233.45	CCTV	3121	D - POOR
Project 11 - 2017 SD Rehab	2395162	364.58	CCTV	574A	D - POOR
Project 11 - 2017 SD Rehab	977352	364	CCTV	4223	E - VERY POOR
Project 11 - 2017 SD Rehab	975630	379.1	CCTV	564D	D - POOR
Project 11 - 2017 SD Rehab	975633	204.8	CCTV	564C	D - POOR
Project 11 - 2017 SD Rehab	1040991	233.9	CCTV	5100	E - VERY POOR
Project 11 - 2017 SD Rehab	996445	398.48	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	963435	160	CCTV	5142	E - VERY POOR
Project 11 - 2017 SD Rehab	1066104	594	CCTV	5242	E - VERY POOR
Project 11 - 2017 SD Rehab	980163	333	CCTV	4A31	E - VERY POOR
Project 11 - 2017 SD Rehab	986902	396.1	CCTV	5641	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 11 - 2017 SD Rehab	976717	300	CCTV	513W	D - POOR
Project 11 - 2017 SD Rehab	985304	300	CCTV	423Z	D - POOR
Project 11 - 2017 SD Rehab	972618	300	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	973004	300	CCTV	5343	D - POOR
Project 11 - 2017 SD Rehab	973237	275	CCTV	5243	E - VERY POOR
Project 11 - 2017 SD Rehab	975761	220	CCTV	5344	E - VERY POOR
Project 11 - 2017 SD Rehab	1007740	28	CCTV	3121	D - POOR
Project 11 - 2017 SD Rehab	1048057	257.9	CCTV	5542	E - VERY POOR
Project 11 - 2017 SD Rehab	1050759	349.4	CCTV	5246	E - VERY POOR
Project 11 - 2017 SD Rehab	1048430	225.5	CCTV	5141	E - VERY POOR
Project 11 - 2017 SD Rehab	1048060	57.2	CCTV	4121	E - VERY POOR
Project 11 - 2017 SD Rehab	1034500	367.3	CCTV	5241	E - VERY POOR
Project 11 - 2017 SD Rehab	978390	376	CCTV	5342	E - VERY POOR
Project 11 - 2017 SD Rehab	977763	198.7	CCTV	5221	E - VERY POOR
Project 11 - 2017 SD Rehab	1018110	318.26	CCTV	413W	D - POOR
Project 11 - 2017 SD Rehab	1021177	309.3	CCTV	5148	E - VERY POOR
Project 11 - 2017 SD Rehab	1030918	303.5	CCTV	524A	E - VERY POOR
Project 11 - 2017 SD Rehab	972603	281	CCTV	5135	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 11 - 2017 SD Rehab	967947	140	CCTV	5B3D	E - VERY POOR
Project 11 - 2017 SD Rehab	976715	300	CCTV	5231	E - VERY POOR
Project 11 - 2017 SD Rehab	1040820	87	CCTV	3424	D - POOR
Project 11 - 2017 SD Rehab	987557	303.9	CCTV	5D36	E - VERY POOR
Project 11 - 2017 SD Rehab	1012786	160	CCTV	5221	E - VERY POOR
Project 11 - 2017 SD Rehab	982972	390	CCTV	4D33	D - POOR
Project 11 - 2017 SD Rehab	984426	320.2	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	1009409	260	CCTV	5341	D - POOR
Project 11 - 2017 SD Rehab	977096	544	CCTV	534S	E - VERY POOR
Project 11 - 2017 SD Rehab	980173	311	CCTV	5648	E - VERY POOR
Project 11 - 2017 SD Rehab	996371	242	CCTV	5200	E - VERY POOR
Project 11 - 2017 SD Rehab	984910	135	CCTV	3D27	D - POOR
Project 11 - 2017 SD Rehab	966820	182.6	CCTV	5231	E - VERY POOR
Project 11 - 2017 SD Rehab	968019	370	CCTV	5145	E - VERY POOR
Project 11 - 2017 SD Rehab	992816	316	CCTV	4131	E - VERY POOR
Project 11 - 2017 SD Rehab	992994	291	CCTV	5121	E - VERY POOR
Project 11 - 2017 SD Rehab	962906	270	CCTV	5143	E - VERY POOR
Project 11 - 2017 SD Rehab	963316	359	CCTV	5241	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	**Asset ID**	**Pipe Length (Feet)**	**Investigative Technique**	**NASSCO PACP Quick Rating**	**SAWS Condition Assessment Category**
Project 11 - 2017 SD Rehab	1050719	400	CCTV	2300	D - POOR
Project 11 - 2017 SD Rehab	975849	382	CCTV	4235	E - VERY POOR
Project 11 - 2017 SD Rehab	976215	400	CCTV	5343	E - VERY POOR
Project 11 - 2017 SD Rehab	967682	203	CCTV	514G	D - POOR
Project 11 - 2017 SD Rehab	966899	366	CCTV	514E	E - VERY POOR
Project 11 - 2017 SD Rehab	976773	400	CCTV	5141	E - VERY POOR
Project 11 - 2017 SD Rehab	977250	419.4	CCTV	532M	E - VERY POOR
Project 11 - 2017 SD Rehab	968250	388	CCTV	562C	E - VERY POOR
Project 11 - 2017 SD Rehab	981749	350	CCTV	3100	E - VERY POOR
Project 11 - 2017 SD Rehab	982027	129	CCTV	4100	E - VERY POOR
Project 11 - 2017 SD Rehab	982295	185.6	CCTV	3121	E - VERY POOR
Project 11 - 2017 SD Rehab	981932	350.7	CCTV	3100	E - VERY POOR
Project 11 - 2017 SD Rehab	965219	385	CCTV	5441	D - POOR
Project 11 - 2017 SD Rehab	3029440	399.83	CCTV	5121	E - VERY POOR
Project 11 - 2017 SD Rehab	976569	362	CCTV	4A21	E - VERY POOR
Project 11 - 2017 SD Rehab	967511	336.3	CCTV	5200	E - VERY POOR
Project 11 - 2017 SD Rehab	969195	325	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	3370832	339.2	CCTV	5141	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 11 - 2017 SD Rehab	974540	381.58	CCTV	5100	E - VERY POOR
Project 11 - 2017 SD Rehab	980022	12	CCTV	5100	D - POOR
Project 11 - 2017 SD Rehab	970080	342	CCTV	5642	E - VERY POOR
Project 11 - 2017 SD Rehab	975076	449	CCTV	534A	E - VERY POOR
Project 11 - 2017 SD Rehab	980687	307.4	CCTV	5249	E - VERY POOR
Project 11 - 2017 SD Rehab	1043231	214	CCTV	4121	D - POOR
Project 11 - 2017 SD Rehab	970692	70	CCTV	5742	E - VERY POOR
Project 11 - 2017 SD Rehab	972615	251.47	CCTV	5I4B	E - VERY POOR
Project 11 - 2017 SD Rehab	990095	335	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	1050961	350	CCTV	5622	E - VERY POOR
Project 11 - 2017 SD Rehab	983325	138.9	CCTV	5144	D - POOR
Project 11 - 2017 SD Rehab	964964	202	CCTV	5241	D - POOR
Project 11 - 2017 SD Rehab	986079	284.93	CCTV	5600	E - VERY POOR
Project 11 - 2017 SD Rehab	1005995	313	CCTV	2300	D - POOR
Project 11 - 2017 SD Rehab	974011	148	CCTV	5C43	E - VERY POOR
Project 11 - 2017 SD Rehab	1009013	110	CCTV	4131	D - POOR
Project 11 - 2017 SD Rehab	990644	360	CCTV	5741	E - VERY POOR
Project 11 - 2017 SD Rehab	1007739	45	CCTV	1100	D - POOR

Table 4-1: SD Condition Remediation					
Project Name	Asset ID	Pipe Length (Feet)	Investigative Technique	NASSCO PACP Quick Rating	SAWS Condition Assessment Category
Project 11 - 2017 SD Rehab	970340	217.39	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	966514	345	CCTV	5100	D - POOR
Project 11 - 2017 SD Rehab	1044143	227.28	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	1021091	277	CCTV	4B2A	D - POOR
Project 11 - 2017 SD Rehab	1008111	40	CCTV	4100	D - POOR
Project 11 - 2017 SD Rehab	3370857	327.7	CCTV	5100	E - VERY POOR
Project 11 - 2017 SD Rehab	974828	400	CCTV	5241	D - POOR
Project 11 - 2017 SD Rehab	978018	407.2	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	990940	344.7	CCTV	5441	E - VERY POOR
Project 11 - 2017 SD Rehab	1009900	210	CCTV	2300	D - POOR
Project 11 - 2017 SD Rehab	1000057	369	CCTV	5131	E - VERY POOR
Project 11 - 2017 SD Rehab	2460083	33	CCTV	5100	E - VERY POOR
Project 11 - 2017 SD Rehab	1023238	77.57	CCTV	5100	E - VERY POOR
Project 11 - 2017 SD Rehab	968999	225	CCTV	5242	D - POOR
Project 11 - 2017 SD Rehab	1064300	355	CCTV	574D	D - POOR
Project 11 - 2017 SD Rehab	1031420	358.7	CCTV	5200	D - POOR
Project 11 - 2017 SD Rehab	976668	313	CCTV	5C43	E - VERY POOR
Project 11 - 2017 SD Rehab	976525	307	CCTV	5143	E - VERY POOR

Table 4-1: SD Condition Remediation					
Project Name	**Asset ID**	**Pipe Length (Feet)**	**Investigative Technique**	**NASSCO PACP Quick Rating**	**SAWS Condition Assessment Category**
Project 11 - 2017 SD Rehab	1051056	500	CCTV	5142	E - VERY POOR
Project 11 - 2017 SD Rehab	976526	57.8	CCTV	5632	E - VERY POOR
Project 11 - 2017 SD Rehab	979556	354	CCTV	594E	E - VERY POOR
Project 11 - 2017 SD Rehab	976044	363	CCTV	5541	E- VERY POOR
Project 11 - 2017 SD Rehab	1002493	229.53	CCTV	544A	D - POOR
Project 11 - 2017 SD Rehab	984834	477	CCTV	4133	D - POOR
Project 11 - 2017 SD Rehab	984725	297	CCTV	534C	D - POOR
Project 11 - 2017 SD Rehab	994632	464	CCTV	513A	E - VERY POOR
Project 11 - 2017 SD Rehab	977954	281	CCTV	5247	D - POOR
Project 11 - 2017 SD Rehab	964346	728	CCTV	5100	D - POOR
Project 11 - 2017 SD Rehab	989775	418.2	CCTV	5241	D - POOR
Project 11 - 2017 SD Rehab	974776	325	CCTV	5139	D - POOR
Project 11 - 2017 SD Rehab	966015	400	CCTV	5141	D - POOR
Project 11 - 2017 SD Rehab	966874	240	CCTV	5441	E - VERY POOR
Project 11 - 2017 SD Rehab	965719	397.12	CCTV	4132	E - VERY POOR
Project 11 - 2017 SD Rehab	974328	192.1	CCTV	5141	E - VERY POOR
Project 11 Total Mileage		***8.5***			

ATTACHMENT C
Table 4-2: Large Diameter (LD) Condition Remediation

Table 4-2: Large Diameter (LD) Condition Remediation					
Project Name	**Asset ID**	**Pipe Length (Feet)**	**Investigative Technique**	**NASSCO PACP Quick Rating**	**SAWS Condition Assessment Category**
Project 12 - LD Rehab	970278	162.6	CCTV	5143	E - VERY POOR
Project 12 - LD Rehab	995298	323.8	CCTV	0000	E - VERY POOR
Project 12 - LD Rehab	1000224	236.13	CCTV	3F00	E - VERY POOR
Project 12 - LD Rehab	1011157	529.25	CCTV	5L36	E - VERY POOR
Project 12 - LD Rehab	988366	48	CCTV	5131	D - POOR
Project 12 - LD Rehab	988405	10	CCTV	5131	D - POOR
Project 12 - LD Rehab	990764	154	CCTV	3100	D - POOR
Project 12 - LD Rehab	997921	142	CCTV	544B	D - POOR
Project 12 - LD Rehab	1010673	474.9	CCTV	5131	E - VERY POOR
Project 12 - LD Rehab	981343	382.9	CCTV	4131	D - POOR
Project 12 - LD Rehab	989347	868	CCTV	4Z00	E - VERY POOR
Project 12 - LD Rehab	978191	243	CCTV	5241	E - VERY POOR
Project 12 - LD Rehab	2383387	256	CCTV	5131	E - VERY POOR
Project 12 Total Mileage		***0.7***			