

EXHIBIT A

City of Oceanside Enhanced Compliance Action No. 1 Cured In Place Pipe Lining Order No. R9-2013-0004

Pursuant to the City of Oceanside's meeting with the San Diego Regional Water Quality Control Board on October 15, 2012, the City is proposing two ECA projects. Enhance Compliance Action No. 1 is a sewer lining project, as outlined below.

ECA No. 1 - Cured in Place Pipe (CIPP) Lining:

Project Description

The City has identified two areas that would substantially benefit from the installation of a CIPP liner. These areas are both located near public waterways (Attachment A). The Capistrano easement segment consists of approximately 2845 lineal feet of 10 inch VCP pipe near the San Luis Rey River (Attachment B) and the N Santa Fe segment consists of 1260 lineal feet of 18 inch VCP pipe near Guajome Lake (Attachment C). Both existing segments are well within their useful life expectancy and are considered to be in good condition.

Performance Criteria

➤ **Confirm that the proposed lines are not on a CIP list.**

We have confirmed that the proposed lines are not on a CIP list. In our settlement agreement, we will make a representation to this effect.

➤ **Demonstrate the proposed lines are not in need of repair.**

A routine inspection was conducted on the Capistrano easement in February of 2012 and the N Santa Fe segment in November of 2012 utilizing CCTV. The results of the inspection indicated the segments were in good condition and that no repairs were necessary. A copy of the CCTV report is available for review.

➤ **Final Project Report to San Diego Water Board**

The City of Oceanside will submit a Final Report declaring that the project is completed and detailing actual fund expenditures. Quarterly monitoring reports are not required because this project is expected to be completed in less than one year. Upon project completion, the City of Oceanside or its contractors will confirm that installation was successful by using CCTV or a similar technology to confirm that work was performed according to plan. The City of Oceanside will include these results in the Final Report.

Environmental Benefits of Slip Lining

➤ What is slip lining and how will it benefit the watersheds?

Lining sewer pipes with various types of material including PVC, HDPE, or a cured-in-place product is a tried and true method of increasing the structural stability of existing sewer pipe without the necessity to excavate. The trenchless method (rather than full pipe replacement), is a preferred method due to both the intrusiveness of excavation and construction activities on the environment and the potential increase in sanitary sewer overflows (SSOs) due to construction debris entering the pipe and causing an SSO¹.

There are various materials used to line sewer pipes and the selection of those materials depends on size and type of the original pipe and other site specific factors. In this case, our objectives are to reduce infiltration and exfiltration, provide increased structural integrity, and potentially improve hydraulics within the system². This is all in an effort to prevent SSOs from impacting our watersheds. Using this "rehabilitation" method as a preventative measure is simply a different use of the same technology with even greater benefits. Instead of fixing a problem, which may have already caused harm to the environment, this method prevents future harm by being less reactive and more proactive.

➤ What is the expected lifespan of vitrified clay pipe (VCP)?

VCP is a high temperature fired structural ceramic pipe. It has been and is still used and preferred because of its strength, its resistance to internal and external corrosion, and overall longevity. The U. S. Army Corps of Engineers assumes a one hundred year service life for VCP according to the National Clay Pipe Institute (NCPI).

➤ What is the expected lifespan of lined pipe?

Independent test results and over 40 years of service all confirm that Insituform® CIPP, a specific brand name and inventor of the lining process, is a structural product with a 100-year design life. As such, the lining should increase the service life of the existing VCP pipe by at least 50 years (conservatively).

➤ How does pipe lining decrease the likelihood of bacteria reaching a receiving water?

A spill or seepage of bacteria from sewer infrastructure can occur in many ways. A crack may lead to exfiltration of raw or treated sewage, or more likely,

¹ Central Valley Clean Water Association and Bay Area Clean Water Agencies. Best Management Practices for Sanitary Sewer Overflow Reduction Strategies. 2009.

² US Environmental Protection Agency. Handbook: Sewer System Infrastructure Analysis and Rehabilitation. 1991.

infiltration of groundwater. Infiltration can decrease the capacity in the pipe and cause SSOs at manholes or lift stations. Lining a pipe seals these cracks to prevent SSOs. Some liners are created to become a stand alone pipe as the original pipe degrades.

➤ **How does this slip lining project meet the criteria of ECAs?**

- As discussed above, the specified objectives of the slip lining project are to reduce infiltration and exfiltration, provide increased structural integrity, and potentially improve hydraulics within the system. A proposed budget and schedule are set forth below.
- The slip lining project will not last longer than one year.
- The nexus for the slip lining project to the December 2010 sewer spill is that the slip lining project will prevent future sewer spills and reduce infiltration and exfiltration of bacteria into water bodies.

Budget and Schedule

Easement	Hydrologic Unit	Hydrologic Sub Area	Linear Feet	Estimated Cost	Material	Size	Year Built
Capistrano	San Luis Rey	Lower San Luis	2,846	\$190,000	VCP	10"	1953
N. Santa Fe	San Luis Rey	Lower San Luis	1,366	\$119,250	VCP	18"	1975

February through March 2013

- Issue a Request for Proposals from several pipe lining contractors
- Receive and review proposals
- Execute a Construction Contract

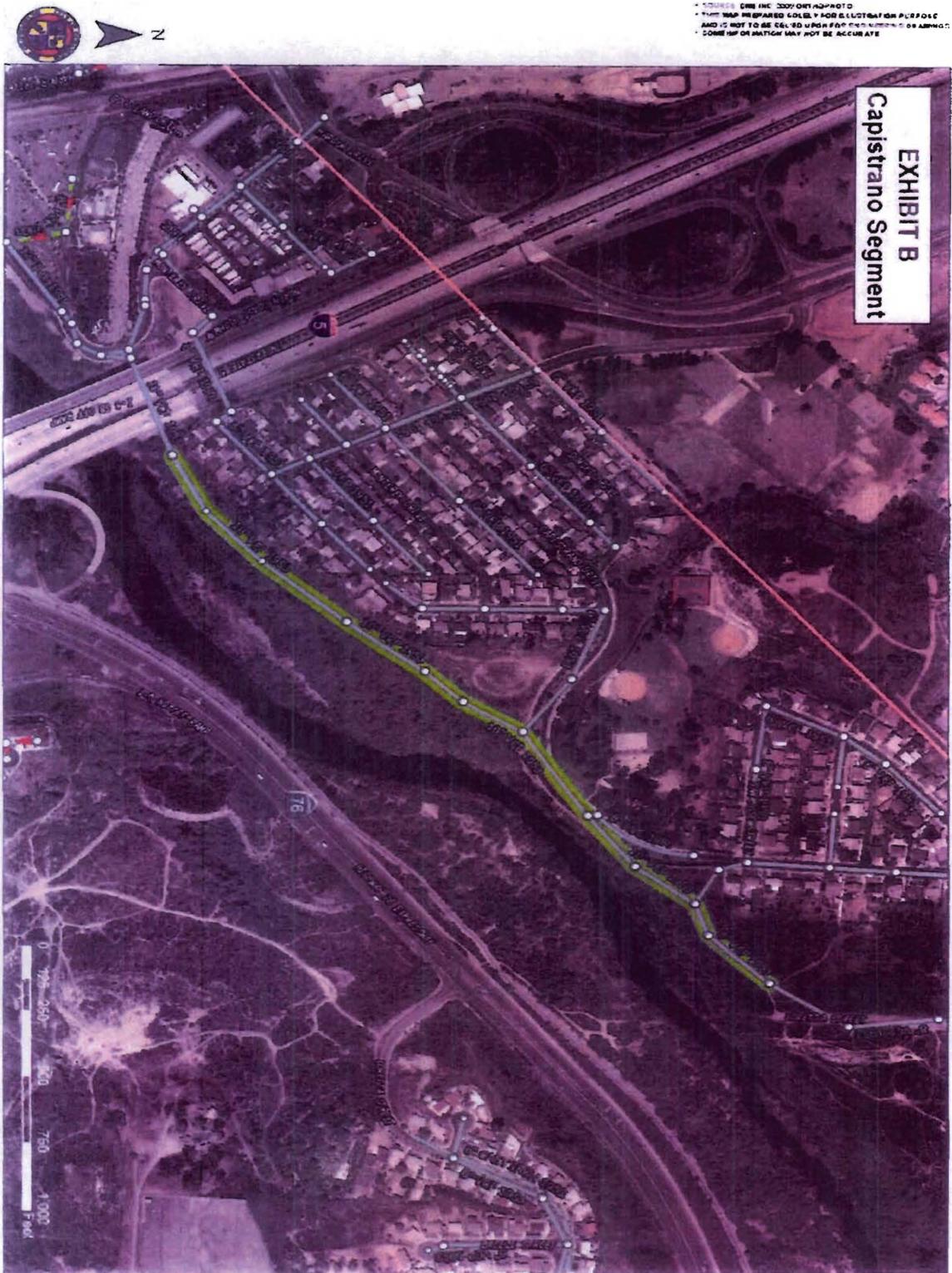
April through June 2013

- Issue a Notice to Proceed
- Construction

July through September 2013

- All work completed

Attachment B



Attachment C



• SOURCE: GRI INC. 2009 ORTHOPHOTO
• THIS MAP PREPARED SOLELY FOR ILLUSTRATION PURPOSE
AND IS NOT TO BE RELIED UPON FOR FINANCIAL DRAWING.
• SOME INFORMATION MAY NOT BE ACCURATE



EXHIBIT C
N. Santa Fe Segment