

Final
Adv

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IN THE MATTER OF:)
)
City of Talladega Water & Sewer Board)
)
Talladega Main WWTP)
Talladega (Talladega County), AL)
)
NPDES Permit No. AL0022357)

CONSENT ORDER NO. 08-010-CWP

PREAMBLE

This Special Order by Consent is made and entered into by the Alabama Department of Environmental Management (hereinafter "the Department") and the City of Talladega Water & Sewer Board (hereinafter the "Permittee") pursuant to the provisions of the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 through 22-22A-16 (2006 Rplc. Vol.), the Alabama Water Pollution Control Act, Ala. Code §§ 22-22-1 through 22-22-14 (2006 Rplc. Vol.), and the regulations promulgated pursuant thereto, and § 402 of the Federal Water Pollution Control Act, 33 U.S.C. § 1342.

STIPULATIONS

1. The Permittee operates a wastewater treatment facility known as the Talladega Main Wastewater Treatment Plant (hereinafter "WWTP") located on 601 Alabama Highway 275 in the City of Talladega, Talladega County, Alabama. The

WWTP discharges pollutants from a point source into the Talladega Creek, a water of the state.

2. The Department is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 through 22-22A-16 (2006 Rplc. Vol.).

3. Pursuant to Ala. Code § 22-22A-4(n) (2006 Rplc. Vol.), the Department is the state agency responsible for the promulgation and enforcement of water pollution control regulations in accordance with the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 to 1387. In addition, the Department is authorized to administer and enforce the provisions of the Alabama Water Pollution Control Act, Ala. Code §§ 22-22-1 through 22-22-14 (2006 Rplc. Vol.).

4. On May 18, 2004, the Department issued National Pollutant Discharge Elimination System (hereinafter "NPDES") Permit No. AL0022357 (hereinafter "Permit") to the Permittee, establishing limits on the discharge of pollutants into Talladega Creek from a point source, designated therein as outfall number 0011. The Permit requires that the Permittee monitor its discharges and submit periodic Discharge Monitoring Reports (hereinafter "DMRs") to the Department describing the monitoring results. The Permit also requires that the Permittee maintain in good working order all systems used by the Permittee to achieve compliance with the terms and conditions of the Permit.

5. The DMRs submitted to the Department by the Permittee indicate that the Permittee has discharged pollutants from outfall 0011 into the aforementioned Talladega Creek in violation of the limitations established in the Permit. The months the violations occurred along with the parameters violated are listed in Attachment 1.

6. On September 8, 2005, the Department issued a Warning Letter to the Permittee addressing violations of effluent limits established by the Permit.

7. As a response to the Warning Letter, the Permittee stated that the cause of the violations was attributed to two major unit-operations being out of service: the unit nitrification towers and the microscreen filter. The Permittee provided that these two unit operations were scheduled to be replaced and that several other facility improvements were also going to be made. An entire facility upgrade construction package was reportedly scheduled to let for bidding on September 20, 2005. Construction was to commence shortly thereafter.

8. On March 23, 2004, a Compliance Evaluation Inspection (hereinafter "CEI") was completed by the Department. The CEI findings identified problems with the nitrification towers and microscreen filter. These two units were inoperable during the CEI.

9. On March 6, 2006, the Department issued a Notice of Violation (hereinafter "NOV") to the Permittee for effluent limitations of a similar nature and extent through the period ending December 2005.

10. On April 3, 2006, the Permittee responded to the March 2006, NOV issued by the Department. The Permittee stated that it executed a construction contract in October 2005, that was to address numerous improvements to the facility, including replacement of nitrification tower media, the tower blowers, and the microscreen filter control panel. However, permit violations continued to occur through October 2006.

11. On May 12, 2005, the Department received the Permittee's 2005 Annual Municipal Water Pollution Prevention Report (hereinafter "MWPP"). The 2005 Annual

MWPP report indicated that thirteen sanitary sewer overflows (hereinafter "SSOs") occurred during calendar year 2004. Eight of the SSOs were reportedly due to inflow and infiltration problems that emanated during rain events. The other five SSOs were reported to be caused by sewer line blockages.

12. On April 11, 2006, the Department received the Permittee's Annual MWPP Report for calendar year 2005. Fourteen SSOs were indicated in calendar year 2005. Eleven SSOs were ascribed to rain events and one SSO event was reportedly due to a broken sewer line. The two remaining SSO events were attributed to sewage line blockages. The Permittee did not indicate in the report whether the blockage-induced SSOs were resolved such that the events would not recur at those same locations. No overflow events were reported at the WWTP. The list of reported SSOs during calendar year 2004, 2005, and 2006 is presented in Attachment 2.

13. On July 27, 2006, the Department received an Engineering Report from the Permittee elaborating on certain resolutions passed by the Talladega Water and Sewer Board intended to ultimately to resolve problems associated with the WWTP.

14. Although the Engineering Report in part addressed the resolutions, the report failed to comprehensively address the ongoing SSOs problem within the wastewater collection system. The timeliness of completion of the various proposed projects was also not provided, as requested in the Department's letter dated April 21, 2006.

15. On February 16, 2007, a citizen lodged a complaint regarding intermittent failures of a pump station located at the intersection of Alabama Highway 275 and Howard Street in Talladega, Alabama. The citizen asserted that the pump station failed

three times this past year, and released wastewater volumes and considerable odor during the overflow periods. On March 20, 2007, the same citizen complained of another instance of a pump station failure at the same aforementioned location.

16. On March 20, 2007, the Department visited the above-stated pump station location, and documented the condition of the area. The Department identified the following concerns: aging conduit and an unpermitted illicit discharge (i.e, an SSO). The source of the SSO was identified to be two adjacent manholes, one with an overflow structure, and another upgradient manhole without an overflow outlet. Sewage was observed to be flowing into a drainage ditch that empties into Talladega Creek. Water samples were collected both upstream and downstream of the drainage ditch confluence with Talladega Creek. Test results for fecal coliform (hereinafter "FC") indicated FC counts of 2 and 12,000 colonies per 100 ml, respectively.

17. A written response was submitted to the Department on March 22, 2007, concerning the above-stated complaints. The Permittee indicated that there were three instances of overflows at the subject manholes due and/or pump station at the Hwy 275 pump station in the past three years. The SSO events reportedly occurred on July 6, 2006, February 26, 2007, and March 20-21, 2007. The cause of each SSO was reportedly attributed to grease buildup in the conveyance system from the Shocco Springs Christian Retreat area and also the failure of a utility transformer that supplies power to the pump station.

18. The Permittee consents to abide by the terms of the following Consent Order and to pay the civil penalty assessed herein.

19. The Department has agreed to the terms of this Consent Order in an effort to resolve the violations cited herein without the unwarranted expenditure of State resources in further prosecuting the alleged violations. The Department has determined that the terms contemplated in this Consent Order are in the best interests of the citizens of Alabama.

PERMITTEE CONTENTIONS

20. The Permittee contends that it identified the WWTP and collection system concerns listed herein and that it attempted to be proactive in resolving system limitations. Specifically, the Permittee installed microscreens in 2003 in an attempt to provide improved treatment. The microscreens were installed based upon the outcome of an ADEM inspection during 2003. The Permittee also contends that it passed a sewer-use rate increase in January 2006 in an attempt to ascertain funding to make additional improvements. In addition, the Permittee pursued and obtained bond money for these projects. As a result, the Permittee reportedly initiated a WWTP rehabilitation project in October 2005 and since that time has incurred a cost of \$2,115,000 to make facility repairs and improvements.

21. Included in the WWTP rehabilitation work completed since 2005, the Permittee re-built its nitrification tower pumps and rebuilt the digester mixing pump. In July 2007 the Permittee is initiating projects to replace sludge pumps and sludge control valves and also to add rollers and tracks to the floating cover of the anaerobic digester.

22. In 2007, the Permittee will begin investigating implementation of a Fats, Oils, and Grease (hereinafter "FOG") program, including development of a FOG

Ordinance. The Permittee also asserts that it will dramatically increase its funding on I&I work beginning with the FY08 budget.

DEPARTMENT CONTENTIONS

23. Pursuant to Ala. Code § 22-22A-5(18)c (2006 Rplc. Vol.), in determining the amount of any penalty, the Department must give consideration to the seriousness of the violation, including any irreparable harm to the environment and any threat to the health or safety of the public; the standard of care manifested by the Permittee; the economic benefit which delayed compliance may confer upon the Permittee; the nature, extent and degree of success of the Permittee's efforts to minimize or mitigate the effects of such violation upon the environment; the Permittee's history of previous violations; and the ability of the Permittee to pay such penalty. Any civil penalty assessed pursuant to this authority shall not be less than \$100.00 or exceed \$25,000.00 for each violation, provided however, that the total penalty assessed in an order issued by the Department shall not exceed \$250,000.00. Each day such violation continues shall constitute a separate violation. In arriving at this civil penalty, the Department has considered the following:

A. SERIOUSNESS OF THE VIOLATION: Violations consisted of exceeding the daily maximum FC and the monthly average limit for percent removal of five-day Carbonaceous Biochemical Oxygen Demand (hereinafter "CBOD5"), Violations also consisted of exceeding both the monthly and weekly average limits for CBOD5 and both the monthly and weekly average concentrations for Ammonia-Nitrogen (hereinafter "NH3-N"). The violations also consisted of unpermitted sanitary sewer overflows (SSOs), some of which occurred during the two year period addressed by this Order.

The September 13, 2006 SSO event resulted from a force majeure event (e.g., hurricane).

B. THE STANDARD OF CARE: The Permittee has initiated significant WWTP rehabilitation efforts since October 2005. These efforts notwithstanding, the Permittee failed to properly maintain its wastewater treatment and collection system to ensure compliance with permit limitations and conditions.

C. ECONOMIC BENEFIT WHICH DELAYED COMPLIANCE MAY HAVE CONFERRED: The Department has been unable to ascertain if there has been any economic benefit conferred by the delay of compliance with permit requirements.

D. EFFORTS TO MINIMIZE OR MITIGATE THE EFFECTS OF THE VIOLATION UPON THE ENVIRONMENT: There are no known environmental effects as a result of the violations addressed by this Order.

E. HISTORY OF PREVIOUS VIOLATIONS: A Warning Letter and NOV were issued by the Department, respectively, on September 8, 2005, and March 6, 2006, addressing violations of a similar nature and extent. These enforcement efforts have been unsuccessful at resolving the ongoing violations.

F. THE ABILITY TO PAY: Based on available information, the Department believes the Permittee has a limited ability to pay a civil penalty.

G. OTHER FACTORS: It should be noted that this Special Order by Consent is a negotiated settlement and, therefore, the Department has compromised the amount of the penalty it believes is warranted in this matter in the spirit of cooperation and in the desire to resolve this matter amicably, without incurring the unwarranted expense of litigation.

ORDER

THEREFORE, the Permittee, along with the Department, desires to resolve and settle the compliance issues cited above. The Department has carefully considered the facts available to it and has considered the six penalty factors enumerated in Ala. Code § 22-22A-5(18)c. (2006 Rplc. Vol.), as well as the need for timely and effective enforcement, and the Department believes that the following conditions are appropriate to address the violations cited herein. Therefore, the Department and the Permittee agree to enter into this CONSENT ORDER with the following terms and conditions:

A. The Permittee agrees to pay to the Department a civil penalty in the amount of \$31,000.00 in settlement of the violations alleged herein within forty-five days from the effective date of this Consent Order. Failure to pay the civil penalty within forty-five days from the effective date may result in the Department's filing a civil action in the Circuit Court of Montgomery County to recover the civil penalty.

B. The Permittee agrees that all penalties due pursuant to this Consent Order shall be made payable to the Alabama Department of Environmental Management by certified or cashier's check and shall be remitted to:

Office of General Counsel
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463

C. Alternatively, within forty-five days after the effective date of this Consent Order, the Permittee may elect to implement a Supplemental Environmental Project (hereinafter "SEP"). If the Permittee elects to implement this SEP, it shall submit

to the Department, no later than thirty days after the effective date of this Consent Order, a letter proposing the SEP, as well as an implementation plan and schedule that must be reviewed and approved in writing by the Department. Upon notification that the SEP is acceptable, the Permittee may then offset a portion of the penalty assessed in paragraph A above. This SEP may, at the sole discretion of the Department, offset a portion of the penalty at a ratio of \$1.00 for every \$3.00 spent on the SEP, but in no event shall the SEP offset the penalty below \$10,350.00. Should the Permittee elect to perform the SEP and should the SEP be proved acceptable to the Department, the Permittee shall, within forty-five days of the effective date of this Consent Order, pay to the Department a civil penalty of \$10,350.00 and shall notify the Department of its election to perform the SEP. Adequate documentation of all expenses related to the SEP shall be submitted to the Department for review and concurrence in determining the amount of the penalty to be offset no later than thirty days after the approved completion date of the SEP or the completion of the SEP, whichever is earlier. Routine operating costs (i.e., those costs that would normally be incurred by the Permittee absent the requirements of the SEP) and costs related to routine compliance requirements, including the costs of complying with the requirements of Paragraphs D through H below, shall not be considered for penalty offset. Should the Permittee not offset the total amount of the penalty allowed, the remaining amount of the penalty required that is not offset shall be due and payable within thirty days of the Permittee's receipt of notification of the remaining amount of penalty due to be paid. If the SEP is implemented, the Permittee shall submit monthly status reports to the Department documenting actual accomplishments and implementation costs. If the SEP is not acceptable to the Department, the remaining

amount of the penalty shall be due and payable within thirty days of the Permittee's receipt of notification that the SEP is not acceptable. Furthermore, in the event that the SEP is not fully implemented within the time-frame accepted by the Department, the remaining amount of the penalty shall be due and payable within thirty days of the Permittee's receipt of notification by the Department.

D. The Permittee agrees to prepare and submit to the Department, not later than ninety days after the effective date of this Consent Order, a Comprehensive Engineering Report. The report must include a schedule for implementation (i.e. a Compliance Plan) identifying all potential causes of noncompliance, including infiltration and inflow into the wastewater collection and treatment system and performance concerns with the WWTP. The report must summarize the Permittee's investigation of the changes necessary for the Permittee to implement to achieve compliance with NPDES Permit Number AL0022357. At a minimum, the Permittee shall consider each of the following in making its determination: the need for changes in maintenance and operating procedures, the need for modification of the existing treatment works and collection system components, and the need for new or additional treatment works and collection system components. The Engineering Report shall be prepared by a professional engineer licensed to practice in the State of Alabama. If the Department determines through its review of the submitted Engineering Report that the contents and recommendations in the report are not sufficient to accomplish compliance with the NPDES permit, then the Engineering Report shall be modified so that it does accomplish compliance. Modifications to the Engineering Report, if required, shall be submitted to the Department no later than thirty days after receipt of the Department's comments. The

Permittee agrees to complete implementation of the recommendations provided in the Engineering Report in accordance with the accepted schedule presented in the Compliance Plan and as required by this Order.

E. The Permittee agrees to prepare and submit Semi-Annual Progress Reports to the Department describing in detail the Permittee's progress towards achieving compliance with items presented in the Compliance Plan. These reports shall be submitted every six months following the effective date of this Consent Order for each year that the Permittee's performance obligations under this Consent Order remain incomplete. In addition, not later than fourteen days following each applicable due date that is contained in this Consent Order, the Permittee shall submit a written notice of compliance or noncompliance with the requirements of that paragraph, if applicable. Notices of noncompliance shall state the cause of noncompliance, the corrective action taken, and the Permittee's ability to comply with any remaining requirements of this Consent Order.

F. The Permittee agrees to comply with FC, NH3-N, CBOD5, and percent removal of CBOD5 limitations of NPDES Permit Number AL0022357 within the accepted schedule provided in accordance with paragraph D of this Order. The Permittee agrees to comply with all other terms, conditions, and limitations of the Permit immediately upon the effective date of this Consent Order.

G. The Permittee agrees that, after the effective date of this Consent Order for every FC, NH3-N, CBOD5, and CBOD5 percent removal limitation established by the NPDES Permit, except for upsets that have been properly documented and substantiated as required by Part II.C.2 of NPDES Permit Number AL0022357, the Permittee shall pay

to the Department the sum of \$250.00 for each and every daily maximum, daily minimum, weekly average, and minimum percent removal violation and \$500.00 for each and every monthly average violation.

H. The Permittee agrees that, after the effective date of this Consent Order, for each day it fails to meet any of the milestone dates or to satisfy any of the requirements set forth in or established by paragraphs A, C, D, and E contained herein, it shall pay stipulated penalties. The stipulated civil penalties for failure to meet each milestone or any requirement date, except for *Force Majeure* acts as hereinafter defined as acts which occur beyond the Permittee's control, shall be as follows:

<u>Period of Noncompliance</u>	<u>Penalty per Day per Violation</u>
1st to 30th day	\$ 100.00
31st to 60th day	\$ 200.00
After 60 days	\$ 300.00

If the Permittee fails to meet any milestone or any assigned date ninety days after the required dates found in paragraphs A, C, D, E, F and G, then the Department reserves the right to file a new action against the Permittee.

I. The parties agree that the cumulative stipulated penalties described in paragraphs G and H above shall under no circumstances exceed \$24,000.00. Once stipulated penalties of \$24,000.00 are due to the Department and violations continue to occur, or, should violations continue to occur after the approved compliance date in accordance with paragraph D of this Consent Order or as stipulated in paragraphs G and H, above, then the Department shall be free to issue additional orders or file suit against the Permittee in the Circuit Court of Montgomery County or in other court of competent

jurisdiction to enforce compliance of this Consent Order.

J. Upon each event (i.e., upon every twenty-four hour period for overflows/bypasses lasting more than twenty-four consecutive hours and upon every occurrence of any overflow/bypass lasting less than twenty-four hours) of an unpermitted discharge, the Permittee shall prepare and submit to the Department, records of all unpermitted discharges of wastewater, such as SSOs, bypasses, etc. (i.e., any discharge of wastewater from any point other than an NPDES permitted outfall). The report(s) shall contain at least the following information: i) the cause (known or suspected) of the discharge; ii) estimated volume (if determinable); iii) description of the source (e.g., manhole, pump station); iv) identification of the collection system that overflowed; v) location, by street address or any other appropriate method; vi) date of event; vii) ultimate destination of the discharge (e.g., the name of the surface waterbody, land use location, or the name of surface waterbody ultimately receiving the discharge via municipal separate storm sewer system (reference location by basin and street address and/or cross streets)); viii) corrective action plans to eliminate future discharges; ix) name and title of person reporting the discharge; x) weather conditions; and xi) a certification statement similar to those contained in Discharge Monitoring Reports, concerning the accuracy of information.

K. The Permittee agrees that payment of stipulated penalties due for violation of effluent limitations under this Consent Order shall be due not later than the 28th day of the month following the monitoring period in which there were violations. Notification to the Permittee by the Department of the assessment of any stipulated penalty is not required.

L. The parties agree that this Consent Order shall apply to and be binding upon both parties, their directors, officers, and all persons or entities acting under or for them. Each signatory to this Consent Order certifies that he or she is fully authorized by the party he or she represents to enter into the terms and conditions of this Consent Order, to execute the Consent Order on behalf of the party represented, and to legally bind such party.

M. The parties agree that, subject to the terms of these presents and subject to provisions otherwise provided by statute, this Consent Order is intended to operate as a full resolution of the violations cited in this Consent Order.

N. The Permittee agrees that it is not relieved from any liability if it fails to comply with any provision of this Consent Order.

O. For purposes of this Consent Order only, the Permittee agrees that the Department may properly bring an action to compel compliance with the terms and conditions contained herein in the Circuit Court of Montgomery County. The Permittee also agrees that in any action brought by the Department to compel compliance with the terms of this Agreement, the Permittee shall be limited to the defenses of *Force Majeure*, compliance with this Agreement and physical impossibility. A *Force Majeure* is defined as any event arising from causes that are not foreseeable and are beyond the reasonable control of the Permittee, including its contractors and consultants, that could not be overcome by due diligence (i.e., causes that could have been overcome or avoided by the exercise of due diligence will not be considered to have been beyond the reasonable control of the Permittee) and which delays or prevents performance by a date required by the Consent Order. Events such as unanticipated or increased costs of performance,

changed economic circumstances, normal precipitation events, or failure to obtain federal, state, or local permits shall not constitute *Force Majeure*. Any request for a modification of a deadline must be accompanied by the reasons (including documentation) for each extension and the proposed extension time. This information shall be submitted to the Department a minimum of ten working days prior to the original anticipated completion date. If the Department, after review of the extension request, finds the work was delayed because of conditions beyond the control and without the fault of the Permittee, the Department may extend the time as justified by the circumstances. The Department may also grant any other additional time extension as justified by the circumstances, but it is not obligated to do so.

P. The Department and the Permittee agree that the sole purpose of this Consent Order is to resolve and dispose of all allegations and contentions stated herein concerning the factual circumstances referenced herein. Should additional facts and circumstances be discovered in the future concerning the facility which would constitute possible violations not addressed in this Consent Order, then such future violations may be addressed in Orders as may be issued by the Director, litigation initiated by the Department, or such other enforcement action as may be appropriate, and the Permittee shall not object to such future orders, litigation or enforcement action based on the issuance of this Consent Order if future orders, litigation or other enforcement action address new matters not raised in this Consent Order.

Q. The Department and the Permittee agree that this Consent Order shall be considered final and effective immediately upon signature of all parties. This Consent

Order shall not be appealable, and the Permittee does hereby waive any hearing on the terms and conditions of same.

R. The Department and the Permittee agree that this Consent Order shall not affect the Permittee's obligation to comply with any Federal, State, or local laws or regulations.

S. The Department and the Permittee agree that final approval and entry into this Consent Order are subject to the requirements that the Department give notice of proposed Orders to the public, and that the public have at least thirty days within which to comment on the Consent Order.

T. The Department and the Permittee agree that, should any provision of this Consent Order be declared by a court of competent jurisdiction or the Environmental Management Commission to be inconsistent with Federal or State law and therefore unenforceable, the remaining provisions hereof shall remain in full force and effect.

U. The Department and the Permittee agree that any modifications of this Consent Order must be agreed to in writing signed by both parties.

V. The Department and the Permittee agree that, except as otherwise set forth herein, this Consent Order is not and shall not be interpreted to be a permit or modification of an existing permit under Federal, State or local law, and shall not be construed to waive or relieve the Permittee of its obligations to comply in the future with any permit.

Executed in duplicate, with each part being an original.

CITY OF TALLADEGA WATER,
AND SEWER BOARD

ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT

By: *[Signature]*
Its: Manager
Date: 8-20-07

By: *[Signature]*
Its: Director
Date: 10/18/07

Attachment 1

AL0022357 TALLADEGA MAIN WWTP

DMR Value Limit Units Averaging Time
 Outfall ID: 0011

November, 2005

<u>BOD CARBONACEOUS</u>			
2	13	10	mg/l
3	16	15	mg/l
<u>CBOD 5 Day Percent Removal</u>			
4	84	85	Percent
<u>NITROGEN AMMONIA TOTAL N</u>			
5	2.49	2	mg/l
6	4	3	mg/l

December, 2005

<u>CBOD 5 Day Percent Removal</u>			
7	83	85	Percent

January, 2006

<u>CBOD 5 Day Percent Removal</u>			
8	79	85	Percent

February, 2006

<u>CBOD 5 Day Percent Removal</u>			
9	81	85	Percent

March, 2006

<u>CBOD 5 Day Percent Removal</u>			
10	83	85	Percent
<u>FECAL COLIFORM</u>			
11	12000	2000	#/100 ml

April, 2006

<u>FECAL COLIFORM</u>			
12	3750	2000	#/100 ml

May, 2006

<u>BOD CARBONACEOUS</u>			
13	11.1	10	mg/l
<u>FECAL COLIFORM</u>			
14	3100	2000	#/100 ml

June, 2006

<u>BOD CARBONACEOUS</u>			
15	11.7	10	mg/l
16	15.5	15	mg/l

July, 2006

<u>BOD CARBONACEOUS</u>			
17	13.7	10	mg/l
<u>CBOD 5 Day Percent Removal</u>			
18	80	85	Percent

<u>NITROGEN AMMONIA TOTAL N</u>			
19	4.17	2	mg/l
20	5.6	3	mg/l

August, 2006

<u>BOD CARBONACEOUS</u>			
21	11.6	10	mg/l
22	15.6	15	mg/l

<u>FECAL COLIFORM</u>			
23	60000	2000	#/100 ml
<u>NITROGEN AMMONIA TOTAL N</u>			
24	5.59	2	mg/l
25	7.2	3	mg/l
26	96.3	75	lbs/day
27	126.8	112	lbs/day

September, 2006

<u>FECAL COLIFORM</u>			
28	60000	2000	#/100 ml

October, 2006

<u>BOD CARBONACEOUS</u>			
29	15.9	10	mg/l
30	26.1	15	mg/l
<u>CBOD 5 Day Percent Removal</u>			
31	84	85	Percent

ATTACHMENT 2: SSO Events Occuring 2006 to 2007

Date	Discharge type	Cause	Estimated Volume	Flow Dest.
9/13/2006	Partially treated ww	I/I, heavy rain	60,000 gallons	Talladega Cr.
3/20/2006	Partially treated ww	I/I, heavy rain	330,000 gallons	Talladega Cr.
2/23/2006	Partially treated ww	I/I, heavy rain	30,000 gallons	Talladega Cr.
2/7/2006	Partially treated ww	I/I, heavy rain	1.31 MGD	Talladega Cr.
1/23/2006	Partially treated ww	I/I, heavy rain	140,000 gallons	Talladega Cr.
4/20/2006	Partially treated ww	I/I, heavy rain	20,000 gallons	Talladega Cr.
10/24/2006	Partially treated ww	Power swap	100,000 gallons	Talladega Cr.
10/12/2006	Partially treated ww	Power swap	10,000 gallons	Talladega Cr.
9/28/2006	Partially treated ww	Power swap	52,499 gallons	Talladega Cr.
6/26/2006	Partially treated ww	I/I, heavy rain	5,000 gallons	Talladega Cr.

Date	Discharge type	Cause	Estimated Volume	Flow Dest.
1/4/2006	Manhole overflows	Blockage	150 gallons	Main WWTP
1/16/2006	Sewer overflows	Blockage	50 - 60 gallons	Main WWTP
12/1/2006	Manhole overflows	Grease	60 gallons	Main WWTP
12/21/2006	Sewer overflows	Blockage	150 gallons	Main WWTP
12/18/2006	Drainage Ditch	Blockage	10,000 gallons	Main WWTP
2/26/2007	Sewer overflows	Grease		Talladega Cr.
3/20/2007	Sewer overflos	Grease		Talladega Cr.

Note: ww stands for wastewater
 Cr. stands for creek
 Dest. stands for destination