

DPWSSO - 0001.03. CWP

Department of Public Works



City of Baton Rouge
Parish of East Baton Rouge
Post Office Box 1471
Baton Rouge, Louisiana
70821

April 7, 2008

CERTIFIED – RETURN RECEIPT REQUESTED

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

Harold Leggett, Assistant Secretary
Office of Environmental Compliance
Department of Environmental Quality
P.O. Box 4312
Baton Rouge, LA 70821-4312

Re: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3
Prioritization Summary – Follow-up from call on February 12, 2008

Gentlemen:

The Environmental Protection Agency (EPA) requested that a summary be submitted describing the method for prioritization of the Program (Second Remedial Measures Action Plan - RMAP2) projects. This request was made formally by Mona Tates/EPA during the conference call held on February 12, 2008. The intent for this submittal is to fill that request and includes the following items:

- Executive Summary of Prioritization for Baton Rouge SSO Control and Wastewater Facilities Program
- Baton Rouge SSO/Project Maps (rehabilitation and capacity projects)
- Draft of Proposed RMAP1 and RMAP2 Milestones

Pending approval of this submittal, the formal RMAP2 submittal is to follow.

As you will notice in this submittal, the draft project milestone schedules are extremely compressed. Most projects are being worked on simultaneously because it takes approximately 2 to 4 years for a typical project to be completed through the pre-design, design, and construction phases. Each rehabilitation “project” represents a significant level of effort and actually includes multiple projects in a targeted area. The City/Parish is still very concerned about the impact that Hurricane Katrina and Rita has had in the Baton Rouge area in regards to the schedule, and its affect on the associated construction costs and contractor availability for RMAP2 project work. The City/Parish believes that it may be necessary to request a time

extension from the EPA and Louisiana Department of Environmental Quality (LDEQ) for the completion of RMAP2 projects due to the affects aforementioned. The City/Parish plans to regularly document all RMAP2 project changes related, with the intent that this will be used to justify the request for time extension at a later date.

I certify that the information contained in or accompanying this document is true, accurate and complete. As to the identified portions of this document for which I cannot personally verify their truth and accuracy, I certify as the official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification, that this is true, accurate and complete.

Sincerely,



Peter T. Newkirk
Director of Public Works

Cc: Honorable Melvin L. "Kip" Holden, Mayor-President
Mr. Walter Monsour, Chief Administrative Officer
Mr. Bruce Hammatt, LDEQ
Chief, Environmental Enforcement Section, US DOJ
Ms. Mona Tate, US EPA Region 6
Mr. Carlos Zequeira, (6RC-EA)
Ms. Gladys Gooden-Jackson, EPA (6EN-WC)
Mr. Ted Broyles II, LDEQ
Mr. Bruce Hammatt, LDEQ
Ms. Peggy Hatch, LDEQ
Mr. Harold Leggett, LDEQ
Mr. Wade Shows, Parish Attorney
Mr. Bob Abbott, Parish Attorney's Office
Mr. Bryan Harmon
Mr. Mark LeBlanc
Mr. Richard Wright
Ms. Amy Schulze
Mr. David Ratcliff
Ms. Cheryl Berry
Mr. Jim Hawley, CH2M HILL
Mr. Michael Ellis, CH2M HILL
Mr. Lee Davis, CH2M HILL
Mr. Gordon Garner, CH2M HILL
Ms. Karen Johnson, CH2M HILL

Executive Summary

The Baton Rouge SSO Control and Wastewater Facilities Program has the following overlying goals:

- Comply with the terms of the Consent Decree
- Comply with the wastewater treatment plant National Pollutant Discharge Elimination System (NPDES) permit,
- Reduce excess wet weather flows that cause SSOs,
- Rehabilitate the collection system,
- Increase the hydraulic capacity of the collection system, and
- Accommodate growth in project areas.

The City/Parish embarked on the current Program near the end of 2006, with the current Program Manager CH2M HILL. The work that has been undertaken since that time was a complete evaluation of the SSO reduction requirements throughout the sewer shed areas. The evaluation process took approximately 16 months. A digital model of the collection and conveyance system was used to prepare and evaluate alternative combinations of rehabilitation projects for the removal of excess flows in the system, and projects that increased the conveyance, storage, and treatment capacity in order to retain flows for treatment. Maximum use of rehabilitation was utilized for the dual purposes of reducing flows, and for the preservation of collection system infrastructure. The City/Parish developed a "Program Delivery Plan" for the Sanitary Sewer Overflow (SSO) Control and Wastewater Facilities Program, which identifies all of the projects that resulted from the intense planning effort. This document forms the basis for the RMAP2 submittal.

As mentioned, there are several types of projects identified as a part of the RMAP2 submittal to help meet the Program goals. The Program includes capacity, rehabilitation, and wastewater treatment/storage improvement projects. A brief summary of the prioritization of the projects is below.

Those projects designed to increase capacity of the collection system to retain the design storm, must be constructed or placed in operation starting from the treatment plants and proceeding outward into the outer reaches of the collection system. This is necessary in order to avoid increasing capacity upstream of a possible bottle neck and potentially creating new overflows, or relocating existing overflows. Capacity projects near the treatment plants are underway in each of the three treatment plant service areas; North, South, and Central. The 57 capacity projects identified as a part of the Program require almost parallel construction schedules since the delivery time for all projects is so compressed. The sequence of projects is of lesser importance in the Baton Rouge SSO Control and Wastewater Facilities Program due to this essentially parallel project implementation.

There are also approximately 26 small sewer rehabilitation project areas which are spread throughout the City/Parish wastewater collection system. The first 4 rehabilitation projects to be completed were selected in areas of concern due to known overflow issues related to inadequate pumping capacity. The intent of this prioritization is to determine the impact of rehabilitation prior to design of the new pumping capacity projects if possible. Pre-construction and post-construction flow monitoring has been, and will continue to be

underway to more accurately evaluate pumping requirements in these areas and throughout the City/Parish. Flow-monitoring will continue throughout the life of the Program in order to calibrate rehabilitation progress.

There are 5 wastewater treatment plant (WWTP) projects that are of first priority, so as to return the South WWTP to dry weather NPDES permit compliance within the next two years. These projects are called Immediate Action Plan (IAP) projects, and are currently underway. Reservoir storage projects at the South and Central WWTPs are also due to begin this year. These projects should reduce the frequency of treatment plant bypasses during extreme weather conditions.

Storage and capacity projects designed to reduce the peak flows to the North WWTP have been identified as early priority, and are currently beginning the implementation process. The reduction of peak flows to the North WWTP should maintain the plant's permit compliance.

Maps

The attached maps show historical SSOs identified throughout the City/Parish, in addition to the planned RMAP2 rehabilitation and RMAP1/RMAP2 capacity projects. The SSOs have been sorted by frequency. One map highlights the RMAP1 projects in construction and the RMAP2 capacity projects that will be under design by 2009. The other map depicts the rehabilitation projects that have been completed to date, as well as those current and planned RMAP2 rehabilitation project areas. The current and planned RMAP2 rehabilitation project areas will address approximately 5 million linear feet (LF), or 50% of the sewer collection system.

Draft Milestone Summary and Schedule

In addition, a draft of the proposed milestone summary and schedule for the RMAP1 and RMAP2 projects is also included for review. It is our intent that the milestone schedules proposed here be included eventually in the formal RMAP2 submittal to the DOJ/EPA/LDEQ.

SSOs_PlanneRehabProj08-09.mxd

Legend

Historical SSOs (by address)

- 1 - 2
- 3 - 5
- 6 - 10
- 11 - 15

Rehab Projects Completed To Date

- 16 - 20
- 21 - 29
- Current RMAP2 Rehab (2007-2009)
- Future RMAP2 Rehab

SSOs and Rehabilitation Projects

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Baton Rouge SSO Control and Wastewater Facilities Program

Note: Boundaries subject to change based on further investigation and flow monitoring.

Note: Some overflows shown in rehab areas will be reduced/eliminated by capacity projects.



Legend

- 11 - 15
- 6 - 10
- 3 - 5
- 1 - 2
- 11 - 15
- 6 - 10
- 3 - 5
- 1 - 2
- 11 - 15
- 6 - 10
- 3 - 5
- 1 - 2

Historical SSOs (by Address)

- 11 - 15
- 6 - 10
- 3 - 5
- 1 - 2

Capacity Design Beginning 2008

- ▲ Capacity Design Beginning 2008
- ▲ Capacity Design Beginning 2009
- ▲ Capacity Design Beginning 2008-2009

Storage Design Beginning 2008-2009

- ⊗ Storage Design Beginning 2008-2009

Wastewater Treatment Plant

- ⊕ South WWTAP IAP Projects

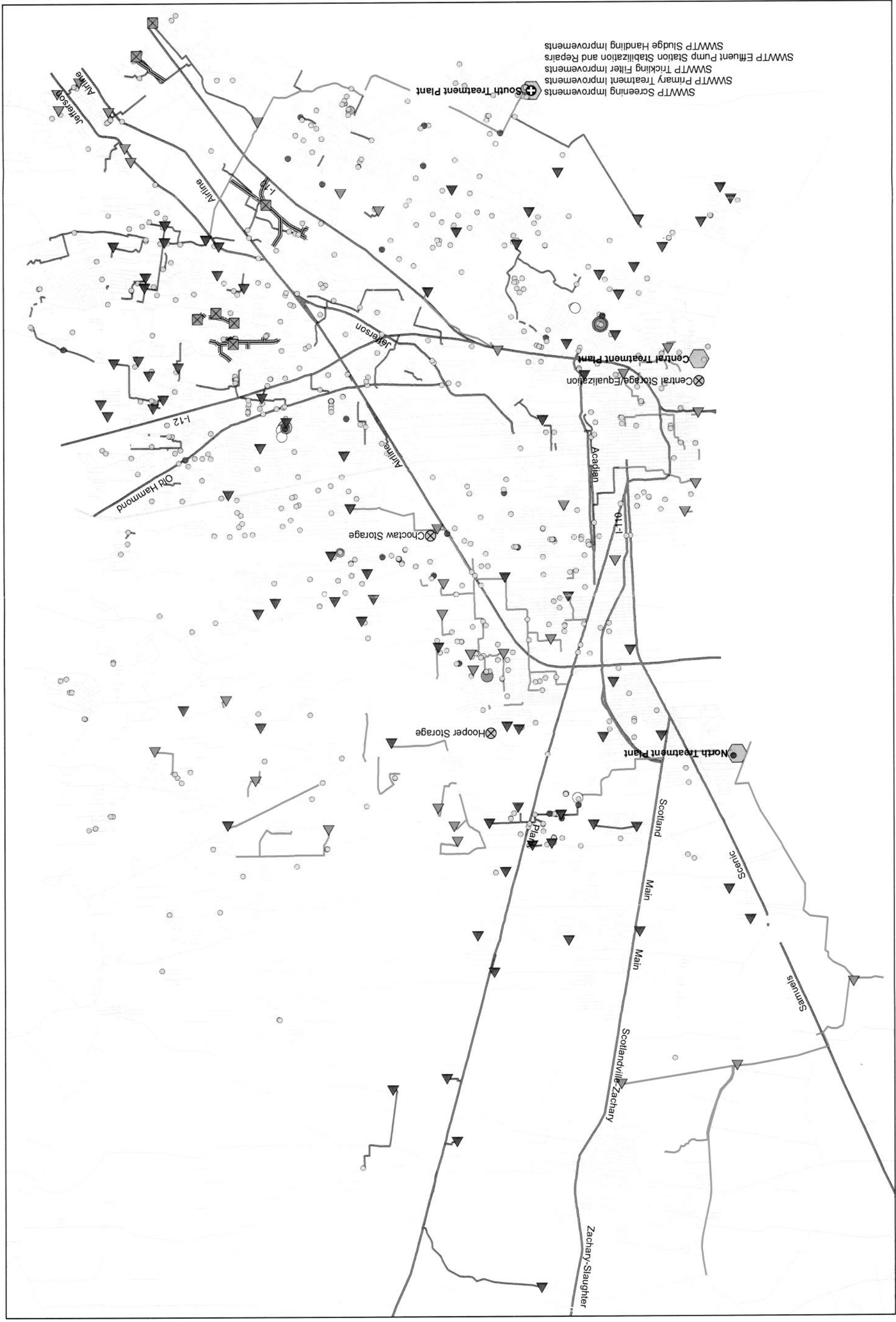
RMAP1 Construction Projects

- ▣ RMAP1 Construction Projects

SSOs and Planned Capacity Projects RMAP1 and RMAP2 2008-2009

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**City of Baton Rouge/Parish of East Baton Rouge
Draft EPA Consent Decree RMAP Milestones**

The following tables present the proposed milestone schedules for the Remedial Measures Action Plan (RMAP) projects, pursuant to Consent Decree Section XII Remedial Measures Collection System Remedial Program. Both the First Remedial Measures Action Plan (RMAP1) and Second Remedial Measures Action Plan (RMAP2) projects are included.

The Consent Decree states that construction completion of the RMAP1 projects shall be by May 4, 2007. However, in the "EPA RMAP1 Status Report" submitted to the EPA/LDEQ in December 2007, the City/Parish requested a time extension for those projects that have not yet been completed due to change in planned engineering technical approach from tunnels to rehabilitations and the ramifications of Hurricane Katrina and Rita, please refer to the EPA RMAP1 Status Report for more details. The EPA has verbally approved the request for time extension for the RMAP1 projects mentioned in the report. It is assumed that the formal approval from the EPA will be granted sometime soon. Therefore those dates proposed in the RMAP1 Status Report are incorporated into the milestone schedule attached.

In addition, in accordance with the Consent Decree, there are four (4) construction milestone dates for RMAP2 projects to also be depicted in schedule format: design completion of RMAP2 projects, 33% completion of construction for all RMAP projects, 66% completion of construction for all RMAP projects, and 100% completion of all projects. In order to define the 33% and 66% milestones, specific projects must have been functionally completed with construction by some time period. These RMAP2 projects have been identified through technical modeling, engineering, and planning efforts of the program and are described in more detail in the Program Delivery Plan (PDP) dated January 2008.

The milestone schedules for each individual RMAP1 and RMAP2 projects are identified in the two (2) tables that are attached.

City of Baton Rouge/Parish of East Baton Rouge Department of Public Works			
Draft EPA Consent Decree RMAP Milestones		RMAP1 Projects Completed	
Milestone Date		May 4, 2007	
Construction Status		Complete	
Consent Decree Projects			
Corresponding City/Parish Projects		RMAP1 Projects Completed	
RMAP1 Projects		RMAP1 Projects Completed	
RMAP1 Projects		Proposed in RMAP1 Status Report	
		Complete	
N-05 PS 24 Area Upgrades	*PS 24/43 Area Upgrade (01-RMP-N05)	X	
N-06 PS 43 Area Upgrades		X	
N-09 PS 44/46 Area Upgrades	PS 44/46 Area Upgrades (01-RMP-N09)	X	
N-10 PS 240 Area Upgrades	PS 240 Area Upgrades (01-RMP-N10)	X	
	NTSN SS Eval. Study (99-RMP-N-99)	X	
	**Bellgrath Rehab. (03-RMP-N14) (NSRP)	X	
***N-99 North Further Investigations	**Frenchtown Road Sewer Rehab. (03-RMP-N15)	X	
	**North Area Comprehensive Rehab. (03-RMP-N23)	X	
	**PS 45 Area Rehab. (00-RMP-N31)	X	
C-03 PS 2 Area Rehabilitation	PS 2 Area Upgrades (01-RMP-C03)	X	
S-01B SWWTP Influent PS	SSO SWWTP Inf. PS Upgrade (99-RMP-SO1B)	X	
S-11 PS 40 Area Rehabilitation	S-11 PS 40 Area Rehabilitation	X	
	SSO Engr-South (99-RMP-S99)	X	
	PS 944 Area Upgrade Grv Sewer (99-RMP-S99)	X	
***S-99 South Further Investigations	PS 944 Area Upgrade (99-RMP-S99)	X	
	PS 177 Area Upgrade (99-RMP-S99)	X	
	**PS 211 Area Upgrades (99-RMP-S11)	X	
N-01 Choctaw Basin Return System	Choctaw Area Storage (04-RMP-N22)		Project was suspended due to change in plan from tunnels to rehab, and has been reevaluated for inclusion in the CH2M HILL RMAP2 Plan. Project is included as RMAP2 NFW-C-0002 - Choctaw Storage.
N-13 North Choctaw Basin System	S-05 PS 58B Area Upgrades MWH RMAP2		Project was suspended due to change in plan from tunnels to rehab, and has been reevaluated for inclusion in the CH2M HILL RMAP2 Plan. Project is included in RMAP2 now as NFW-C-0003 - Choctaw Storage PS.
N-04 PS 47 Area Upgrades	N-04 PS 47 Area Upgrades		Project shelved indefinitely due to change in plan from deep tunnels to rehab
N-07 PS 39/55 Area Upgrades	N-07 PS 39/55 Area Upgrades		Project was suspended due to change in plan from tunnels to rehab, and has been reevaluated for inclusion in the CH2M HILL RMAP2 Plan. Project is included in RMAP2 now as NFW-C-0008 - (Multiple PS - Airline Hwy Greenwell Street).
N-11 PS 65 Area Upgrades	PS 65 and 65A Area Upgrades (01-RMP-N11)		Project shelved indefinitely due to change in plan from deep tunnels to rehab, significant growth in the area, and the Comite River diversion cutting the system off
N-02 PS 49/52 Area Upgrades	PS 49/52 Area Upgrade (01-RMP-N02)		Date has yet to be determined
N-12 North Sewer Rehab Projects	North Sewer Rehab Projects (03-RMP-N12)		Completed December 2007
S-08 Indurplex Area Upgrades	Indurplex Area PS 355 and FM Upgrades (99-RMP-S08)		4th Quarter 2009
S-14 Kleinpeter Area Upgrades	Kleinpeter Area Upgrades (03-RMP-S14)		2nd Quarter 2010

City of Baton Rouge/Parish of East Baton Rouge Department of Public Works			
Draft EPA Consent Decree RMAP Milestones			
		RMAP1 Projects Completed	RMAP1 Projects Completed
		May 4, 2007	Proposed in RMAP1 Status Report
		Complete	Complete
Consent Decree Projects			
		Corresponding City/Parish Projects	
RMAP1 Projects			
S-16	PS 136 Area Upgrades	PS 136 Area Upgrades (99-RMP-S16)	2nd Quarter 2010
*Notes: This project was executed as a combination of two RMAP1 projects			
**Notes: These projects were added as RMAP1 projects by the City/Parish after entry into the Consent Decree			
***Notes: This RMAP1 project was split up into multiple projects for better execution			

City of Baton Rouge/Parish of East Baton Rouge Department of Public Works			
Draft EPA Consent Decree RMAP Milestones			
		Design Complete Milestone All RMAP2 Projects - 3rd Quarter 2013	
		33% Construction Milestone	
		66% Construction Milestone	
		100% Construction Milestone	
Milestone Date		4th Quarter 2014	
Construction Status		Construction Functionally Complete	
Project Descriptions		Construction Functionally Complete	
RMAP2 Projects		Construction Functionally Complete	
Jefferson Hwy - HooShoo Too Road		X	
Staring Lane - Boone Drive		X	
Gardere Lane - Burbank Road		X	
Oak Villa Blvd - Choctaw Street		X	
Brookstown Road - Evangeline Street		X	
Sharp Road - Florida Blvd		X	
Foster Drive - Government Street		X	
Kenilworth Blvd - Boone Drive		X	
Elm Grove Garden Road - Harding Blvd		X	
Bluebonnet Blvd - Jefferson Hwy			X
Scotland Avenue - Progress Road		X	
Silverleaf Road - Ford Street		X	
Highland Road - Washington Street			X
Stanford Avenue - Morning Glory Road			X
Airline Highway - Goodwood Blvd			X
Acadian Thruway - Claycut Road			X
Acadian Thruway - Perkins Road			X
Antioch Road - Chadsford Drive			X
Jones Creek Road - Tiger Bend Road			X
Scenic Highway - Spanish Town Road			X
Siegen Lane - Interstate 10			X
Interstate 110 - Hollywood Street			X
Ardenwood Drive - Winbourne Street			X
Flannery Road - Florida Blvd			X
East Boulevard - Government Street			X
North 38th Street - Gus Young Avenue			X
Capital Lake Drive - Gayosa Street		X	
Roosevelt Street Area - PS1 Improvements		X	
Gurney Road - Joor Road		X	
Multiple Pump Stations - Lovett Road Area		X	
Comite Road - Foster Road		X	
Foster Road - Hooper Road		X	
Highway 61/Zachary/Baker		X	
South Boulevard - St. Joseph Street		X	
Downtown Area - PS10 & PS59 Improvements		X	
Downtown Area - PS15, PS19 & PS60 Improvements		X	
Highland Road - Buchanan Street		X	
Citilace/Essen Area - PS119 & Forcemain Improvements		X	
Airline Highway - Victoria Drive		X	
McClelland Drive - Glen Oaks Drive		X	
Multiple PS - Airline Hwy Greenwell Street		X	
Progress Rd - Baton Rouge Metro Airport		X	
Perkins/Old Perkins Area - Booster PS 514 Improvements		X	
Multiple PS - Jefferson Hwy - Highland Rd		X	
Highland Road - Burbank Drive		X	
Nicholson Dr - Highland Rd - Perkins Rd			X
Perkins Road - Dahlia Street			X
25th Street - North Acadian Thruway			X
Government St - South Acadian Thruway			X
Plank Road - Kleinpeter Road			X
O'Neal Lane - Jones Creek Road			X
O'Neal Lane - Tiger Bend Road			X
University Lake Area - PS2, PS5, & PS6 Improvements			X
Acadian/Clay Cut Area - PS3 & PS4 Improvements			X

City of Baton Rouge/Parish of East Baton Rouge Department of Public Works			
Draft EPA Consent Decree RMAP Milestones			
Project Descriptions	Design Complete Milestone All RMAP2 Projects - 3rd Quarter 2013		Construction Functionally Complete
	33% Construction Milestone	66% Construction Milestone	
Milestone Date	4th Quarter 2012	2nd Quarter 2014	4th Quarter 2014
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Project Descriptions			
RMAP2 Projects			
Multiple PS - Nicholson Dr - Brightside Dr		X	
Staring Lane FM & PS58 Improvements		X	
Airline Highway - Jefferson Highway	X		
Essen/Staring Area - PS57 Improvements		X	
Essen Lane - Interstate 12		X	
Multiple PS - Highland Road - Kenilworth Parkway		X	
Multiple PS - Florida Blvd - Sherwood Forest Blvd		X	
Multiple PS - Plank Road - Thomas Road		X	X
Multiple PS - Plank Road - Harding Boulevard			X
Multiple PS - Highway 61 - Plank Road			X
Multiple PS - Jones Creek Rd - Tiger Bend Rd			X
Airline Highway - Interstate 12		X	
Florida Boulevard - Sherwood Forest Boulevard		X	
Goodwood Boulevard - South Flannery Road		X	
Joor Road - Greenwell Springs Road		X	
Plank Road - Port Hudson Pride Road		X	
Essen Lane - Highland Road			X
Oak Villa Boulevard - Monterey Boulevard			X
Stanford Avenue - Ferndale Avenue			X
Lovett Road - Greenwell Springs Road			X
Highland Road - Lee Drive			X
Multiple PS - Hooper Rd - Greenwell Springs Rd			X
Multiple Booster PS - Hooper Rd - Lovett Rd		X	
Multiple PS - Prescott Rd - Greenwell Springs Rd			X
Multiple PS - Jefferson Hwy - Park Forest Dr			X
Multiple PS - O'Neal Ln - S. Harrells Ferry Rd			X
Multiple PS - O'Neal Ln - S. Harrells Ferry Rd			X
Airline/Florida Boulevard Area - PS30 Improvements & New PS			X
Multiple PS - Burbank Drive - Siegen Lane			X
Hooper Storage		X	
Central Storage/Equalization			
South WWTP			
Choctaw Storage		X	
Choctaw Storage PS		X	
SWWTP Screening Improvements		X	
SWWTP Primary Treatment Improvements		X	
SWWTP Trickling Filter Improvements		X	
SWWTP Effluent Pumping Improvements		X	
SWWTP Sludge Handling Improvements		X	