

BATON ROUGE SSO PROGRAM
2002 CONSENT DECREE



2011 ANNUAL REPORT

January 28, 2012

January 28, 2012

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

Re: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3
Annual Report - **Period Ending December 31, 2011**

Gentlemen:

Pursuant to Paragraph 52 of the Consent Decree, the City of Baton Rouge and Parish of East Baton Rouge (City/Parish) hereby submits the Annual Report covering activities for the year ending December 31, 2011. This report addresses the following items:

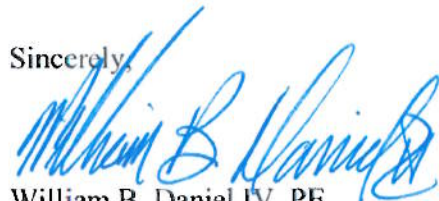
- Remedial Measures Action Plan (RMAP)
- Treatment Facility Assessment
- Environmental Results Monitoring (ERM)
- Interim Relief Measures Activities
- Outreach and Public Awareness Program
- Plan Modification Needs
- Stipulated Penalties

These items are described in Sections XII, XIII, XIV, XVI, XV and XXI of the Consent Decree.

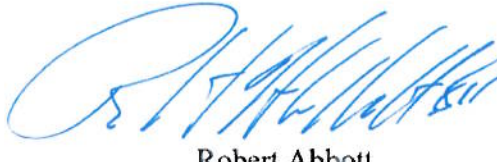
Mr. William Daniel
January 28, 2012
Page 2

I certify that the information contained in or accompanying this document is true, accurate and complete. As to 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,



William B. Daniel IV, PE
Director of Public Works



Robert Abbott
Senior Assistant Parish Attorney

Cc: Honorable Melvin L. "Kip" Holden, Mayor-President
Mr. John Carpenter, Chief Administrative Officer
Mr. Michael Donnellan, US DOJ
Ms. Mona Bates, US EPA Region 6
Mr. Carlos Zequeira, US EPA (6RC-EA)
Ms. Gladys Gooden-Jackson, US EPA (6EN-WC)
Mr. Ted Broyles, LDEQ
Mr. Bruce Hammatt, LDEQ
Ms. Peggy Hatch, LDEQ
Mr. Harold Leggett, LDEQ
Mr. Mary Roper, Parish Attorney
Mr. Bob Abbott, Parish Attorney's Office
Mr. David Guillory, DPW
Mr. Bryan Harmon, DPW
Mr. Greg Wiley, DPW
Mr. Jim Ferguson, DPW
Mr. Mark LeBlanc, DPW
Ms. Amy Schulze, DPW
Mr. Garcia Dialekwa, DPW
Ms. Cheryl Berry, DPW
Mr. Michael Ellis, CH2MHILL

**CITY-PARISH DEPARTMENTAL MEMORANDUM
WASTEWATER TREATMENT AND DISPOSAL DIVISION**

2444 River Road
Baton Rouge, LA 70802


Date: January 28, 2012

To: Mr. Bryan Harmon, DPW
From: Mrs. Karen E. Johnson, CH2M HILL
Re: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3
2011 Annual EPA Report
Data Review

Draft copies of the above referenced report have been submitted for your review. This review is to ensure that the data submitted under your direction, has been stated in a truthful and accurate manner in the 2011 Annual EPA Report. Once the review of the data is complete and corrected, please sign below the paragraph stating that fact and return for processing.

Sincerely,
Karen Johnson, PE
Regulatory Coordinator/CH2M HILL

I certify that the information contained in or accompanying the portion of the 2011 Annual EPA Report that I am responsible for is true, accurate, and complete. As to those 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.



cc: Document Control

**CITY-PARISH DEPARTMENTAL MEMORANDUM
WASTEWATER TREATMENT AND DISPOSAL DIVISION**

2443 River Road
Baton Rouge, LA 70802

Date: January 28, 2012

To: Mr. Garcia Dialekwa, DPW
From: Mrs. Karen E. Johnson, CH2M HILL
Re: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3
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Regulatory Coordinator/CH2M HILL

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1-27-2012

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**BATON ROUGE SSO PROGRAM
2002 CONSENT DECREE**

2011 ANNUAL REPORT

January 28, 2012

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Baton Rouge Consent Decree

2011 Annual Report

This Annual Report for the period from January 1, 2011 to December 31, 2011 is submitted in accordance with Section XVIII, Reporting Paragraph 52, of the Consent Decree. This report addresses all items identified in Consent Decree Exhibit I regarding the Annual Report format and content.

During the past year, significant progress was made towards achieving Second Remedial Measures Action Plan (RMAP2) compliance. By the end of 2011, the City of Baton Rouge/Parish of East Baton Rouge (City/Parish) had completed fifteen (15) projects ahead of the EPA milestone schedules and was implementing 71 projects (46 projects under construction and 25 projects in design) in order to strive to achieve the compliance schedules set forth in Tables 2, 3, and 4 of this Annual Report. Additionally, as of December 31, 2011, there have been 54 Consent Decree reporting deliverables submitted on or ahead of schedule.

1. Remedial Measures Action Plan

In 1998, the City/Parish originally developed a comprehensive Remedial Measures Action Plan (RMAP) for the collection system during consent decree negotiations, identified as Alternative 1 (the original Sanitary Sewer Overflow [SSO] Plan) in the Consent Decree. A Value Engineering (VE) study was commissioned in early 2000 to explore cost-saving alternatives. The VE study identified seven options based on the original SSO Plan for further consideration. Three of those alternatives (specifically 3, 4, and 7) were considered equivalent low-cost options that deemed further examination. Through a series of Metro Council and public meetings, Alternative 7, the Composite Plan, was selected. At the time, the Program Manager for the work associated with the Composite Plan was Montgomery Watson Harza (MWH). The focus of this plan was to utilize deep tunnels in order to store flows throughout the wastewater collection system during high flow/wet weather conditions in order to eliminate SSOs throughout the City/Parish during the design storm condition (2 year - 12 hour). The Composite Plan consisted of two parts: the First Remedial Measures Action Plan (RMAP1) and Second Remedial Measures Action Plan (RMAP2).

1.1 RMAP1 Summary

The First RMAP (or RMAP1), submitted on January 10, 2001, consisted of the projects that were common to all three of the lowest cost VE options (3, 4, and 7) being evaluated. These RMAP1 projects listed in Exhibit F of the Consent Decree were those projects common to the alternatives presented in Section XII - Remedial Measures: Collection System Remedial Program of the Consent Decree. There were a total of 19 "common" projects identified through various modeling and VE efforts associated with the original SSO Corrective Action Plan developed by MWH in 1998. These projects were common to the alternative plans presented in the Consent Decree that focused on utilizing deep tunnels/storage to control the SSOs throughout the City/Parish's wastewater collection system. The phased implementation of these RMAP1 projects began at the end of 1999 and the beginning of 2000. These projects were planned to start

and finish at different times due to funding constraints and the need for easements and permits. Since the date of entry into the Consent Decree, the City/Parish has been diligently working on the design and construction of these RMAP1 projects; all of these projects have been completed. During the planned execution of these projects, significant events occurred with the change in technical approach of the Collection System Remedial Program and, as such, some RMAP1 projects have been affected. Any such changes have been reported in previous reports.

In 2004 and 2005, the City/Parish decided to re-evaluate the planned technical approach of their Collection System Remedial Program, while implementing RMAP1 projects. This review resulted in a consequential change in technical approach from deep tunnels and storage, to a focus on sewer rehabilitation. At that point, the original RMAP1 projects that had not begun were re-examined. Some of these projects were shelved and others were re-evaluated to see if they fit into the new plan. During this time period, the City/Parish's consultants that were hired to help plan and execute these projects changed. Camp Dresser & McKee (CDM) was hired to develop an alternative plan not dependent on deep tunnels with an emphasis on rehabilitation of sewers to remove infiltration and inflow, and conveyance system improvements. CDM completed the initial conceptual reevaluation of the sewer rehabilitation plan, and CH2M HILL was later contracted to serve as the Program Manager and charged to perform a more thorough and detailed engineering and evaluation of the revised approach. CH2M HILL is currently the City/Parish's consultant/Program Manager for the Sanitary Sewer Overflow (SSO) Control and Wastewater Facilities Program which was initiated to meet the goals of the Consent Decree.

In December 2007, the City/Parish and CH2M HILL submitted a detailed *RMAP1 Status Report* to the EPA that summarized the status of all of the RMAP1 projects. This report included a formal "Request for Time Extension" for those RMAP1 projects not yet completed, and a corresponding schedule for project completion. This report was submitted as the milestone requirement pursuant to Section XVIII – Reporting of the Consent Decree. This report and the request for a time extension were verbally approved by the U.S. Environmental Protection Agency (EPA) during a conference call on February 12, 2008. Since no formal approval was granted from the EPA or Louisiana Department of Environmental Quality (LDEQ) for the RMAP1 projects that were outstanding which were highlighted in the report, the City/Parish re-submitted the revised RMAP1 milestones as outlined in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008).

In late 2008, an Agreement and Order Regarding the Modification of the Consent Decree was submitted to the court and was approved by the Department of Justice (DOJ), EPA, and LDEQ in April 2009. This approval formally accepted the RMAP1 milestones presented in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). Although with this approval a new technical approach to resolve SSOs was approved which made the old tunnel plan obsolete, the City/Parish and CH2M HILL are actively moving forward with the execution of the remaining RMAP1 projects included herein based on the approved revised schedule.

The current status of the RMAP1 projects in progress is presented in Table 1 and is current through December 31, 2011. All 14 RMAP1 projects are functionally completed, and 13 of the 14 were done either on, or ahead of schedule. The RMAP1 - Industriplex has had several issues arise during the construction phase pertaining to unavoidable utility conflicts, difficult easement acquisitions, alignment changes, and permitting and other utility coordination issues

that have caused significant delays with the project which could not be overcome by reasonable actions by the City/Parish and its construction contractor. This project has been functionally complete and in operation since 1st quarter 2011. The City/Parish asserts that this project is not susceptible to stipulated penalties due to the circumstances of the delay beyond the control of the City/Parish. The circumstances behind the delay are explained in detail below and have been also mentioned in the previous Quarterly EPA Reports. The *RMAP1 Completion Report* which is included here in *Attachment A: RMAP1 Completion Report*, and also included in *Attachment 1: Updated Outreach and Public Awareness Plan and RMAP1 Completion Report* which is attached at the end of the 36th Quarterly EPA Report.

TABLE 1 EPA Consent Decree RMAP1 Milestones				
Milestone Date		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
Consent Decree Projects	Corresponding City/Parish Projects			
RMAP1 Projects				
N-05 PS 24 Area Upgrades	*PS 24/43 Area Upgrade (01-RMP-N05)	✓		
N-06 PS 43 Area Upgrades				
N-09 PS 44/46 Area Upgrades	PS 44/46 Area Upgrades (01-RMP-N09)	✓		
N-10 PS 240 Area Upgrades	PS 240 Area Upgrades (01-RMP-N10)	✓		
***N-99 North Further Investigations	NTSN SS Eval. Study (99-RMP-N-99)	✓		
	**Bellingrath Rehab. (03-RMP-N14) (NSRP)	✓		
	**Frenchtown Road Sewer Rehab. (03-RMP-N15)	✓		
	**North Area Comprehensive Rehab. (03-RMP-N23)	✓		
	**PS 45 Area Rehab. (00-RMP-N31)	✓		
C-03 PS 2 Area Rehabilitation	PS 2 Area Upgrades (01-RMP-C03)	✓		
S-01B SWWTP Influent PS	SSO SWWTP Infl. PS Upgrade (99-RMP-SO1B)	✓		
S-11 PS 40 Area Rehabilitation	S-11 PS 40 Area Rehabilitation	✓		
***S-99 South Further Investigations	SSO Engr-South (99-RMP-S99)	✓		
	PS 944 Area Upgrade Grv Sewer (99-RMP-S99)	✓		
	PS 944 Area Upgrade (99-RMP-S99)	✓		
	PS 177 Area Upgrade (99-RMP-S99)	✓		

TABLE 1 EPA Consent Decree RMAP1 Milestones				
Milestone Date		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
Consent Decree Projects	Corresponding City/Parish Projects			
RMAP1 Projects				
	**PS 211 Area Upgrades (99-RMP-S11)	✓		
N-01 Choctaw Basin Return System	Choctaw Area Storage (04-RMP-N22)			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage.
N-13 North Choctaw Basin System	S-05 PS 58B Area Upgrades MWH RMAP2			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage PS.
N-04 PS 47 Area Upgrades	N-04 PS 47 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-07 PS 39/55 Area Upgrades	N-07 PS 39/55 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-11 PS 65 Area Upgrades	PS 65 and 65A Area Upgrades (01-RMP-N11)			Project suspended. Evaluated for inclusion in RMAP2 and Master Plan. Project proposed as a part of the Master Plan.
N-02 PS 49/52 Area Upgrades	PS 49/52 Area Upgrade (01-RMP-N02)		4 th Quarter 2008	Project completed – 4th quarter 2008 (at 80% complete with construction). Project was in dispute with construction contractor. Both parties reached an agreement on terms and job was closed at 80% complete.
N-12 North Sewer Rehab Projects	North Sewer Rehab Projects (03-RMP-N12)		4 th Quarter 2007	Project completed – 4th quarter 2007.
S-08 Industriplex Area Upgrades	Industriplex Area PS 355 and FM Upgrades (99-RMP-S08)		2 nd Quarter 2010	Project completed – 1st quarter 2011.
S-14 Kleinpeter Area Upgrades	Kleinpeter Area Upgrades (03-RMP-S14)		2 nd Quarter 2010	Project completed – 2nd quarter 2009.
S-16 PS 136 Area Upgrades	PS 136 Area Upgrades (99-RMP-S16)		2 nd Quarter 2010	Project completed – 2nd quarter 2010.

TABLE 1 EPA Consent Decree RMAP1 Milestones				
Milestone Date		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
Consent Decree Projects	Corresponding City/Parish Projects			
RMAP1 Projects				
<p>* This project was executed as a combination of two RMAP1 projects</p> <p>** These projects were added as RMAP1 projects by the City/Parish after entry into the Consent Decree</p> <p>*** This RMAP1 project was split up into multiple projects for better execution</p>				

1.2 RMAP2 Summary

The Second RMAP (RMAP2), which was originally submitted on November 19, 2002 by the City/Parish and their consultants at that time, MWH, consisted of the projects required to complete the selected overall remedial action plan, or Alternative 7. As the planning and design activities for the RMAP2 projects progressed, it was apparent that modifications to the project definitions and schedules were necessary. On December 3, 2004, proposed RMAP modifications were submitted for review and approval.

In early 2005, the City/Parish began re-evaluating Alternative 7 of the original Composite Plan, due to large budget over runs of several projects that were indicative of total project cost increases of 50% or more. CDM was hired to do a preliminary evaluation of alternatives and the City/Parish developed an “updated” Second RMAP approach, or revised RMAP2, based on more aggressive sewer rehabilitation and comprehensive upgrades of pumping stations. The City/Parish, in conjunction with CDM, submitted a written request with proposed RMAP2 modifications for review and approval to the EPA and LDEQ on July 29, 2005. The City/Parish conducted a telephone conference with EPA and LDEQ on August 1, 2005 in order to present the program status. That presentation included the requested revision to the RMAP2 with the sewer system rehabilitation focus that CDM helped to develop. The requested plan modification represented a material change in the currently approved RMAP2 (based on the change from Alternative 7 of the tunnel plan), though the requested revision to the RMAP2 did not actually extend the final compliance date beyond the January 1, 2015 which was the original deadline for Alternative 7, listed in the Consent Decree. At that time, the City/Parish made every reasonable effort to complete the work to meet the original deadlines and focused additional efforts and resources to accelerate wastewater treatment plant improvements to achieve consistent permit compliance at the earliest date possible.

The revised RMAP2, submitted by the City/Parish and CDM, had not yet been approved by the EPA and LDEQ in early 2006 when the City/Parish engaged CH2M HILL to conduct a peer review to address issues about elements of the alternative plan including an assessment of costs and schedules and a reassessment of the South Wastewater Treatment Plant (WWTP) proposed work. Based on the peer review recommendations, a re-submittal, and the second request for approval, of the Revised RMAP2 modifications (including CDM’s plan and CH2M HILL’s updated plan for South WWTP compliance projects) was submitted by the City/Parish in conjunction with CH2M HILL on December 12, 2006. CH2M HILL was also selected as the new Program Manager, or City/Parish consultant, for this work during this timeframe. Per EPA and

LDEQ request, a more descriptive follow-up report entitled *Addressing Existing Noncompliance Issues and Future Wet-Weather Flow Management Requirements for the South Wastewater Treatment Plant – Summary of Findings and Recommendations* was submitted in January 2007 that specifically addressed work at the South WWTP. This report detailed the recommendations outlined in the previous Revised Second RMAP submittal in December 2006. On July 10, 2007, the EPA and LDEQ sent a formal letter of approval to the City/Parish endorsing the December 2006 Revised Second RMAP proposal.

Since that time, a huge planning and engineering effort was undertaken by the City/Parish and the new Program Manager, CH2M HILL, and others in order to develop and implement a detailed RMAP2 submittal based on three types of projects: comprehensive sewer rehabilitation, pump station and transmission (capacity) improvements, and wastewater treatment/storage improvements. This planning and engineering effort consists of refined modeling and calibration, detailed calculations, review of field data, and project development, prioritization, and cost estimating. This RMAP2 submittal outlines the projects planned to eliminate SSOs throughout the City/Parish, in addition to describing the projects planned to meet permit requirements at the wastewater treatment plants. *The Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* report was submitted to the DOJ, EPA, and LDEQ for review and approval in September 2008. The proposed plan represents a substantial commitment to try to meet the original demanding schedule required by the Consent Decree (January 1, 2015). The City/Parish and CH2M HILL will continually refine and perform quality control reviews of the hydraulic model of the sewer system, incorporating new information as it becomes available. These refinements may technically alter some aspects of the RMAP2 projects. However, with the EPA and LDEQ approval, the City/Parish regularly documents all RMAP2 project changes (scope changes, project additions, and project deletions) in the Quarterly and Annual EPA Reports.

During the review and approval process of *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008), an Agreement and Order related to the Modification of the Consent Decree (Agreement and Order) was lodged with the Court on November 10, 2008. The Agreement and Order adopts the City/Parish's September 2008 *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program*. This RMAP2 submittal is consistent with current industry standards and the 2002 Consent Decree, including Section V – Objectives. The RMAP2 submittal also does not extend the schedule beyond the January 1, 2015 deadline already imposed in the Court approved 2002 Consent Decree, and adheres to Section XXXIV - Modification – Paragraph 118. The Agreement and Order was to be lodged with the Court for public notice and comment for a period of not less than 30 days in accordance with DOJ policy and in 28 C.F.R. § 50.7, and 45 days in accordance with the LDEQ La. R.S. 30:2050.7. The City/Parish was e-mailed two public comments received by the DOJ in regards to the Agreement and Order on January 5, 2009.

Since that time, the City/Parish and CH2M HILL developed a technical memorandum titled *Response to Public Comments of the Agreement and Order Regarding the Modification of the Consent Decree - Civil Action No. 01-978-B-M3 (M.D. La.)* which included the City/Parish's response to the two public comments received by the DOJ on December 17, 2008 from Mr. Steve Irving and Ms. Kathryn Lewis. The memorandum was initially submitted on January 23, 2009, was later updated based on comments received by DOJ, and was submitted as a final version of the memorandum on February 27, 2009. The City/Parish believes that it provided a comprehensive

response to the public comments received, and also highlighted the extensive progress that has been achieved to date associated with the Consent Decree. Additionally, many actions to address the concerns expressed in the public comments received were already either completed or underway. The City/Parish requested that the Court timely approve the modification, as the City/Parish had multiple projects that were currently ready to begin design as soon as the Consent Decree modification is approved. On April 22, 2009, the DOJ, EPA, and LDEQ approved the Agreement and Order which specifically adopts the City/Parish's *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008).

The City/Parish and CH2M HILL are actively moving forward with the execution of the RMAP2 projects included herein, as outlined in the April 2009 Consent Decree Modification by DOJ, EPA, and LDEQ, that adopts the corresponding *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). A significant number of these RMAP2 projects are currently underway due to the tight schedule required by the Consent Decree. The RMAP2 project milestone schedules are extremely compressed. Given that it takes approximately 2 to 4 years for a typical project to be completed through the pre-design, design, and construction phases, most projects are being implemented simultaneously. The City/Parish is working hard to keep projects on schedule and to maintain the financing plan in spite of significant impacts from US and regional economic conditions. In previous submittals, the City/Parish has documented the impact of force majeure events that have affected the Baton Rouge Area (including Hurricanes like Katrina, Rita, and Gustav, the Gulf of Mexico oil spill, and other extreme storm events). The Consent Decree schedule is very demanding and the time lost in the past years from these events has affected the critical early planning stages of the program. The City/Parish considers that it is important to track these events in regards to their potential affect on schedule and compliance, and also their affect on the associated construction costs and contractor availability for RMAP2 project work. The City/Parish will continue to regularly document all RMAP2 project changes related to force majeure events, with the intent that this documentation may be used to support a request for time extension at some later date for projects if it is deemed necessary.

As of December 31, 2011 there are 15 RMAP2 projects functionally completed (ahead of schedule), 46 projects under construction and 25 projects under design, and the City/Parish hasn't hit the peak of activities which is projected to be sometime in 2012 when there is expected to be over 60+ projects under construction at one time, in addition to 10 under design. There is growing concern that the sheer number of projects actively under construction from 2011-2014 will overwhelm administrative capacity and ability to manage projects efficiently with reasonable impacts on the public. Efforts are being made to look at schedule adjustments that provide for better project management and use of resources.

The City/Parish is seeing many of the affects from the ramping up of the design and construction activities. In recent quarters, contractor availability and high bid prices have become issues of trepidation, however in the last quarter this has remained in check. In addition, the capacity of both internal and external support functions is becoming an issue of growing concern. Particularly due to the stresses already placed on several key support roles specifically with regards to the City/Parish procurement system, easement and right-of-way acquisition, and state/local permit acquisitions/approvals. All of these support systems are already strained and the peak of RMAP2 work is yet to come in sometime in later in 2012.

Bidding, constructing and closing out so many projects at the same time to meet a milestone schedule that was done before significant project design, requires administrative and technical resources to be stretched, and project management is more difficult than if the schedule were driven by technical and best management approaches. Impacts of the large number of projects under construction on local traffic and neighborhoods are also a serious concern. The City/Parish and CH2M HILL are evaluating strategies to manage the potential impacts as more projects are bid and contractor bonding capacity may be exceeded. The City/Parish is working hard to keep projects on schedule and to maintain the financing plan in spite of significant impacts from previous hurricanes and US and regional economic conditions. It is possible that these conditions may potentially impact projects in the future.

The City/Parish continues documenting the impact of force majeure events that have affected the Baton Rouge Area (including Hurricanes like Katrina, Rita, and Gustav, the Gulf of Mexico oil spill, Mississippi River flood, Tropical Storm Lee, or other extreme storm events). The Consent Decree schedule is very demanding and the time lost in the past years from these events has affected the critical early planning stages of the program. The City/Parish considers that it is important to keep track of these events in regards to their potential affect on schedule and compliance, and also their affect on the associated construction costs and contractor availability for RMAP2 project work. The City/Parish will continue to regularly document all RMAP2 project changes related to force majeure events, with the intent that this documentation may be used to support a request for time extension at some later date for some projects if it is deemed necessary.

The City/Parish has also voluntarily begun aggressively implementing several projects outside of the scope of the Consent Decree RMAP2 requirements which will have significant benefits to those living and working throughout the City/Parish at their additional expense. Many of the projects are being undertaken solely to improve the operation and maintenance of the wastewater collection system and treatment facilities which should further help reduce SSO risk throughout the City/Parish. Some of these projects are as follows:

- **Stand-by Power Program** - This project will drastically reduce SSOs caused by power outages at the 400+ pump stations in the system, by providing stand-by power at the pump stations. This program consists of installing generators at every wastewater pump station and wastewater treatment facility throughout the City/Parish that can be put in place during power outages, eliminating the risk of overflows from this cause.

Status: Generator purchasing began in 2010, and generator installation began in 2011. Program will continue for the duration of SSO Program.

- **SCADA Project** - the SCADA Project will provide telemetry and remote monitoring to all existing pump stations, new pump stations, and those pump stations being replaced. The project provides remote monitoring of operations data & alarms that will be communicated via telemetry to a centralized operations center. The centralized operations center will have control capability for major pump stations and storage facilities in the system, allowing flow control to anticipate and reduce the possibility of overflows and/or reduce their severity. The remote monitoring will help City/Parish staff quickly respond to mechanical and electrical problems at the pump stations.

Status: SCADA project is currently under design and will advertise for construction in 1st quarter 2012. Project will continue for the duration of SSO Program.

- **Choctaw Maintenance Facility** – the Choctaw Administration/Maintenance Facility will consolidate several separate City/Parish facilities to one location. The facility will house the wastewater collections staff, provide warehouse and equipment storage, house the electrical and pump maintenance shops, and include a fueling station for use by City/Parish employees. The site is centrally located in the parish, so the maintenance facility will allow staff to be efficiently deployed to all areas of DPW’s sewer network. The pump maintenance shop will include a pump testing pit, which allows the City/Parish to test pumps at the shop rather than testing once installed at the pump station.
 - **Status:** Project is currently under design. This project will begin construction in 2013.
- **North Wastewater Treatment Plant Odor Control Project - the North WWTP Odor Control Project** is designed to minimize odors from the WWTP headworks building
 - **Status:** Project is complete.
- **Comite Drive - Foster Road Phase 2 Project** - this project includes an upgrade to the existing sewer system that runs along Comite Drive. The current sewer system in this area is individual septic systems that discharge into an open ditch along the road. A new sewer collection system is being installed to eliminate these discharges. The project consists of new sewers, forcemains, and pump stations.
 - **Status:** Project is complete.

The City/Parish and CH2M HILL will continually refine and perform quality control reviews of the hydraulic model of the sewer system, incorporating new information as it becomes available. These on-going refinements may alter the RMAP2 projects to improve their effectiveness. However, with the EPA and LDEQ approval, the City/Parish plans to regularly document all RMAP2 project changes (scope changes, project additions, project deletions, and schedule changes) in the Quarterly and Annual EPA Reports.

During the last two quarters of 2009, the RMAP2 projects were being re-evaluated as a part of the Program Delivery Plan Update (2009 PDP Update), and as a result some projects were depicted differently in the tables below. Several construction sequencing issues were discovered, resulting in the combining of several capacity improvement projects to minimize these issues. In addition, several rehabilitation projects have been split up for ease of management and execution of the design and construction work associated with the rehabilitation projects. Also, some project names have been altered so that the commonly used names of the projects are utilized from here forward. There are two capacity projects [Airline Highway - Jefferson Highway and Staring Lane FM B - PS58 Improvements (Highland to Perkins)] whose milestone dates are adversely affected as a result of these project changes. The Airline Highway - Jefferson Highway project was combined with 2 other projects who both had later milestone dates, so it was determined that the later milestone date would be used for the

merged project. The City/Parish has already completed several projects ahead of schedule, and it is anticipated that several additional projects will be positively impacted by these modifications and completed ahead of their milestone schedules. Please note that even though the execution and naming of some of these projects has changed that overall no scope of the RMAP2 has been removed or deleted. The RMAP2 project modifications depicted in the tables below have been approved by the City/Parish so they have been incorporated into this and all other upcoming Quarterly and Annual EPA Reports and those that follow. See the notes in the "Project Status Summary" columns in Tables 2, 3, and 4 for more details.

The 2010 Annual PDP update was completed and all changes approved by the City/Parish for the year ending in 2010. Several projects in 2011 have had minor scope changes due to technical issues, such as re-routing of gravity sewers or forcemains to avoid other utilities or land issues. In addition, there were several projects that have been split up for ease of construction management, and also to help shorten construction durations so that the EPA milestone schedules will be easier to achieve. All changes are reflected in the notes in the "Project Status Summary" columns in Tables 2, 3, and 4.

The 2011 Annual PDP update is underway. Once it is completed and has been reviewed/approved by the City/Parish, Tables 2, 3 and 4 will be updated to reflect any changes associated with this process.

In July 2011, the City/Parish submitted a request for time extension for the RMAP2 projects listed below. See *Attachment B: Request for Time Extension/Modification of the Compliance Schedule in the Approved RMAP2 Submittal*. Since that time, the DOJ, EPA, and LDEQ have formally submitted the modified Consent Decree which includes the time extension proposal which is out for public comment at this time. The City/Parish has begun incorporating minor schedule modifications in order to take into account some of the proposed changes included in the request for time extension in anticipation of its formal approval.

The RMAP2 projects are separated into three categories with descriptions and schedules provided for all projects, current through December 31, 2011.

1.2.1 Category 1: Comprehensive Sewer Basin Rehabilitation

Based on sewer system digital model analysis and flow monitoring, 26 sub-basins within the collection system require comprehensive rehabilitation. Sewer system comprehensive rehabilitation projects are implemented to repair or replace components of the system that are defective and may permit excessive infiltration and inflow.

Table 2 presents the Category 1 comprehensive rehabilitation sub-basin projects and anticipated delivery milestone schedules. Status summaries are also provided for those projects already underway. Pump station improvements are included in the projects listed in Category 2, Pump Station and Transmission Improvements on the following pages.

TABLE 2				
EPA Consent Decree RMAP2 Milestones for Category 1 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions	RMAP2 Projects			
Jefferson Hwy – HooShooToo Road	✓			Project completed – 3 rd quarter 2009.
Staring Lane - Boone Drive	✓			Now called “Staring Lane – Boone Drive Area Rehabilitation Project”. Project completed – 2 nd quarter 2010.
Gardere Lane - Burbank Road	✓			Now called “Burbank Drive – Gardere Lane Area Rehabilitation Project”. Project completed – 4 th quarter 2010.
Oak Villa Blvd - Choctaw Street	✓			Now called “Oak Villa – Choctaw Street Area Rehabilitation Project”. Waiting on contract close-out paperwork. Project completed – 3 rd quarter 2011.
Scotland Avenue - Progress Road	✓			Now called “Scotland Avenue – Progress Road Area Rehabilitation Project”. Project completed – 2 nd quarter 2011.
Elm Grove Garden Road - Harding Blvd	✓			Now called “Elm Grove Garden Road – Harding Boulevard Area Rehabilitation Project”. Waiting on contract close-out paperwork. Project completed – 3 rd quarter 2011.
Sharp Road - Florida Blvd	✓			Now called “Sharp Road – Florida Boulevard Area Rehabilitation Project”. Construction approximately 74% complete and on-going.
Kenilworth Blvd - Boone Drive	✓			Now called “Kenilworth Boulevard – Boone Drive Area Rehabilitation Project”. Construction approximately 60% complete and on-going.
Foster Drive - Government Street	✓			Project split into 2 phases for ease of management during construction. Overall scope the same. Now called “Phase A Foster Drive – Government Street Area Rehabilitation Project, and Phase B Foster Drive – Government Street Area Rehabilitation Project”. Phase A –Additional repairs were added to the contract. Waiting on contract close-out paperwork. Project completed – 4 th quarter 2011. Phase B –Construction approximately 70% complete and on-going.

TABLE 2				
EPA Consent Decree RMAP2 Milestones for Category 1 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Silverleaf Road - Ford Street	✓			Now called "Silverleaf Road – Ford Street Area Rehabilitation Project". Construction approximately 9% complete and on-going.
Brookstown Road - Evangeline Street	✓			Project split up into 2 phases for ease of management. Overall scope the same. Now called "Brookstown Road - Evangeline Street Phase I Area Rehabilitation Project" and "Brookstown Road – Evangeline Street Phase II Area Rehabilitation Project". Phase I –Construction approximately 38% complete and on-going. Phase II – Construction approximately 19% complete and on-going.
Bluebonnet Blvd - Jefferson Hwy		✓		Project split up into 2 phases for ease of execution. Overall scope the same. Now called "Bluebonnet Blvd – Jefferson Hwy Phase I Area Rehabilitation Project" and "Bluebonnet Blvd – Jefferson Hwy Phase II Area Rehabilitation Project". Phase I –Construction approximately 19% complete and on-going. Phase II – Construction NTP issued. Construction approximately 9% complete and on-going.
Highland Road - Washington Street	✓			Now called "Highland Road – Washington Street Area Rehabilitation Project". Advertisement for bids underway. Construction NTP expected 1 st quarter 2012. Project has experienced minor delays and is projected to be delayed at this time. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date.
Stanford Avenue - Morning Glory Road	✓			Now called "Standford Avenue – Morning Glory Road Area Rehabilitation Project". Construction approximately 8% complete and on-going.

TABLE 2				
EPA Consent Decree RMAP2 Milestones for Category 1 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Airline Highway - Goodwood Blvd		✓		Project split up into 2 phases for ease of execution. Overall scope the same. Now called "Airline Highway – Goodwood Blvd Phase I Area Rehabilitation Project" and "Airline Highway – Goodwood Blvd Phase II Area Rehabilitation Project". Phase I – Survey completed. Design NTP issued and design approximately 75% complete and on-going. Phase II – Data analysis and report completed. Survey approximately 50% complete. Design NTP expected to be issued. Design approximately 25% complete and on-going.
Acadian Thruway - Claycut Road	✓			Now called "Acadian Thruway – Claycut Road Area Rehabilitation Project". Construction NTP expected to be issued 1st quarter 2012.
Acadian Thruway - Perkins Road	✓			Now called "Acadian Thruway – Perkins Road Area Rehabilitation Project". Construction NTP expected 1st quarter 2012.
Antioch Road - Chadsford Drive		✓		Now called "Antioch Road – Chadsford Drive Area Rehabilitation Project". Physical inspection underway. Data analysis and report expected to be completed 1st quarter 2012.
Jones Creek Road - Tiger Bend Road		✓		Now call "Jones Creek Road – Tiger Bend Road Area Rehabilitation Project". Physical inspection underway. Data analysis and report expected to be completed 1st quarter 2012.
Scenic Highway - Spanish Town Road			✓	Project split up into 2 phases for ease of execution. Overall scope the same. Now called "Scenic Highway – Spanish Town Road Phase I Area Rehabilitation Project" and "Scenic Highway – Spanish Town Road Phase II Area Rehabilitation Project". Phase I – Not started yet. Phase II – Find work underway. Data analysis and report expected to begin 1st quarter 2012.
Siegen Lane - Interstate 10		✓		Now called "Siegen Lane – Interstate 10 Area Rehabilitation Project".

TABLE 2				
EPA Consent Decree RMAP2 Milestones for Category 1 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Interstate 110 - Hollywood Street		✓		Now called "Interstate 110 – Hollywood Street Area Rehabilitation Project".
Ardenwood Drive - Winbourne Street			✓	Now called "Ardenwood Drive – Winbourne Street Area Rehabilitation Project".
Flannery Road - Florida Blvd			✓	Now called "Flannery Road – Florida Boulevard Area Rehabilitation Project".
East Boulevard - Government Street			✓	Now called "East Boulevard – Government Street Area Rehabilitation Project".
North 38th Street - Gus Young Avenue			✓	Now called "North 38 th Street – Gus Young Avenue Area Rehabilitation Project".

1.2.2 Category 2: Pump Station and Transmission Improvements

The Infoworks digital wastewater model was used to identify necessary increases in the capacity of existing gravity trunk sewers, pump stations, and transmission mains in order to accommodate peak wastewater flows remaining in the rehabilitated collection system. Table 3 presents a list of Category 2 projects with corresponding milestone schedules. Project status summaries are provided for those projects already underway, current through December 31, 2011.

TABLE 3				
EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Capitol Lake Drive - Gayosa Street	✓			Now called "Capitol Lake – Gayosa Street Area Capacity Improvements". A portion of 25 th and North Acadian Thruway Project is included in this project to eliminate construction conflicts. Construction approximately 86% complete and on-going.
Gurney Road - Joor Road	✓			Project completed – 4th quarter 2009.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Multiple Pump Stations - Lovett Road Area	✓			Also called "Sullivan Rd./Lovett Rd./Wax Rd. Sewer Upgrades". Project completed – 1st quarter 2011.
Comite Road - Foster Road	✓			Now called "Comite Road – Foster Road Sewer Area Upgrades - Phase I". Phase I – Project completed – 2nd quarter 2010. Note that there is a "Comite –Foster Road Sewer Area Upgrades - Phase II" project which includes additional scope than originally included in the SSO Control and Wastewater Program. Phase II to be constructed with and funded by the City's Green Light Program (Roadway Improvements) project. This project includes an upgrade to the existing sewer system that runs along Comite Drive. The project consists of new sewers, forcemains, and pump stations. Project completed – 1st quarter 2011.
Foster Road - Hooper Road	✓			Now called "Foster Road – Hooper Road Sewer Area Upgrade". Project completed – 4th quarter 2010.
Zachary Area Transmission Network Improvements		✓		Project has been split up into 4 phases for ease of execution (Previously called Red Mud Lakes and Hwy 61 Zachary/Baker). Now called "Zachary Area Transmission Network Improvements: Phase I - 3 Pump Stations and Equalization Basin, Phase II – Red Mud Lakes Forcemain to NWWTP, Phase III – Forcemain to Highway 964 to Red Mud Lakes, Phase IV – Zachary Improvements". Phase I – Construction approximately 40% complete and on-going. Phase II – Advertisement for bids underway. Phase III – Contractor having difficulty with pipe delivery of large diameter ductile iron pipe, however project still on schedule. Construction approximately 1% complete and on-going. Phase IV – Construction approximately 91% complete and on-going.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects <i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions	RMAP2 Projects			
South Boulevard - St. Joseph Street	✓			Now called "South Boulevard – St. Joseph Street Sewer Area Upgrades". Note that a portion of the 25 th and North Acadian Thruway Project is included in this project to eliminate construction conflicts. Construction approximately 68 % completed and is on-going.
Downtown Area - PS59 Improvements	✓			Now called "Downtown Area Pump Station Improvements". Project merged with Downtown Area PS15, PS19, and PS60 Improvements. Significant scope addition to project during design. Construction approximately 24% complete and on-going.
Downtown Area - PS15, PS19 & PS60 Improvements	✓			Now called "Downtown Area Pump Station Improvements". Project merged with Downtown Area PS59 Improvements. Significant scope addition to project during design. Construction approximately 24% complete and on-going.
Highland Road - Buchanan Street	✓			Now called "Highland Road – Buchanan Street Sewer Area Upgrades". Project completed - 4th quarter 2011.
Citiplace/Essex Area - PS119 & Forcemain Improvements	✓			Construction approximately 86% complete and on-going.
North Capacity Group 1A - Veterans Memorial Parkway - Gravity Mains		✓		Now called "Group Project 1A (Metro Airport Sewer Upgrades)". Construction approximately 9% complete and on-going.
North Capacity Group 1B - Veterans Memorial Parkway - PS and FM		✓		Also called "Group Project 1B (Metro Airport Sewer Area Pump Station & Forcemain Upgrades)". Project has experienced minor delays due to PS relocation and now delays due to land acquisition issues (lot of land with title issues). The City/Parish will take necessary steps in cooperation with the contractor to meet the planned completion date. Land acquisition underway. Advertisement for bidding expected to begin 1 st quarter 2012.
Perkins/Old Perkins Area - Booster PS 514 Improvements		✓		Construction contract awarded. Construction NTP issued. Construction approximately 10% complete and on-going.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Group 2 - Small Pump Stations	✓			Now called "Group Project 2 (Old Perkins – Highland Road Area Upgrades)". Construction approximately 10% completed and on-going.
Highland Road - Burbank Drive	✓			Now called "Highland Road – Burbank Drive Capacity Improvements". Land acquisition underway. Project has experienced minor delays at this time due to utility relocation and land acquisition issues. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. Contractor considering bringing in more crews. Construction is approximately 12% complete and on-going.
Nicholson Dr - Highland Rd - Perkins Rd		✓		Now called "Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase A" and "Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase B". Note that a portion of this project (25%) has been separated out into phase A for early construction to eliminate conflicts with a nearby development. Phase A –Construction approximately 95% complete and on-going. Phase B – Final design submitted. Advertisement for bids expected to be underway 1st quarter 2012. LSU portion of project to be moved into the Multiple PS – Nicholson – Brightside Project due to land acquisition delays with LSU.
Perkins Road - Dahlia Street		✓		Now called "Bayou Duplantier Area Sewer Upgrades". Land acquisition on-going. Advertisement underway. Construction NTP expected 1 st quarter 2012.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
25th Street - North Acadian Thruway	✓			Final design submitted and reviewed. NOTE: Portions of this project to be bid with both the Capital Lake – Gayosa Drive Project, and the South Blvd. – St. Joseph Street Project to eliminate construction conflicts. Since design of 25 th – North Acadian Thruway is completed and construction work was combined with these two separate projects, this project has been closed. Please see status construction updates for the two projects mentioned above.
Government St - South Acadian Thruway		✓		Final design submitted and reviewed. Land acquisition on-going. Advertisement for bids expected to be underway 1 st quarter 2012.
Plank Road - Kleinpeter Road		✓		Now called “Plank Road – Kleinpeter Road Sewer Area Upgrades”. Project has experienced minor delays at this time due to construction conflicts with PS 45 and land acquisition issues. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. Final design submitted. Land acquisition underway. Advertisement for bidding expected to be underway 1 st quarter 2012.
O’Neal Lane - Jones Creek Road		✓		Now called “O’Neal Lane Pipeline Improvements – A” and “O’Neal Lane Pipeline Improvements – B”. Project originally merged with O’Neal Lane – Tiger Bend Road project for ease of management and limit construction disruption in the area; however the project has been split up into 2 phases to help shorten the contractor construction durations in order to meet the EPA milestone schedules. Phase A - 90% design underway. 90% design expected to be submitted and reviewed early 1 st quarter 2012. Design on-going. Phase B - 90% design underway. 90% design expected to be submitted and reviewed 1 st quarter 2012. Design on-going.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
O'Neal Lane - Tiger Bend Road		✓		<p>Now called "O'Neal Lane Pipeline Improvements – A" and "O'Neal Lane Pipeline Improvements – B". Now called "O'Neal Lane Pipeline Improvements". Project merged with O'Neal Lane – Jones Creek Road project for ease of management and limit construction disruption in the area; however the project has been split up into 2 phases to help shorten the contractor construction durations in order to meet the EPA milestone schedules.</p> <p>Phase A - 90% design underway. 90% design expected to be submitted and reviewed early 1st quarter 2012. Design on-going.</p> <p>Phase B - 90% design underway. 90% design expected to be submitted and reviewed 1st quarter 2012. Design on-going.</p>
Multiple PS - Nicholson Dr - Brightside Dr		✓		<p>Final design submitted. Design on-going. Project has experienced minor delays at this time due to construction sequencing and LSU land acquisition issues. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. Advertisement for bids expected to begin 1st quarter 2012.</p>
PS 58A Overflow Pump Station		✓		<p>Now called "Pump Station 58 Capacity Improvements". Final design submitted and under review. Land acquisition underway, though there have been issues with obtaining LSU land which have caused minor delays. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. Design on-going. Advertisement for bidding expected to be underway 1st quarter 2012.</p>
Staring Lane FM A - Burbank to Highland	✓			<p>Now called "Staring Lane FM (Phase I - Burbank Drive to Highland Road)". Constructed with City's Green Light Program project to eliminate potential constructability issues arising in that area. Project completed – 2nd quarter 2010.</p>

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Staring Lane FM B – PS58 Improvements (Highland to Perkins)	✓			Now called “Staring Lane FM (Phase II - Highland road to Perkins Road)”. Project projecting to be delayed at this time, though the City/Parish is working with the contractor to minimize the delay. Project is to be constructed with City’s Green Light Program project to eliminate potential constructability issues arising in that area which is the main cause of the delay. The anticipated construction completion date is 3 rd quarter 2013. Issues with utility relocation during construction phase. Construction approximately 3% complete and on-going.
Staring Lane FM C - Perkins to PS 58		✓		Now called “Staring Lane FM (Phase III - Perkins to PS58)”. Construction NTP issued. Construction 1% complete and on-going.
Multiple PS - Jefferson Hwy - Park Forest Dr		✓		Construction approximately 13% complete and on-going.
Airline Highway - Jefferson Highway		✓		Now called “Airline Highway Pipeline Improvements”. Project merged with both the Essen Lane – Interstate 12 project and the Airline Highway – Interstate 12 project for ease of management and to eliminate construction sequencing issues. Project has experienced minor delays at this time due to land acquisition issues. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. 90% design submitted and reviewed. Final design expected to be submitted 1 st quarter 2012. Design on-going.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects <i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Essen Lane - Interstate 12			✓	Now called "Airline Highway Pipeline Improvements". Project merged with both the Airline Highway – Jefferson Highway project and Airline Highway – Interstate 12 project for ease of management and to eliminate construction sequencing issues. Project has experienced minor delays at this time due to land acquisition issues. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. 90% design submitted and reviewed. Final design expected to be submitted 1 st quarter 2012. Design on-going.
Multiple PS - Highland Road - Kenilworth Parkway			✓	60% design submitted and currently under review. 90% design expected to be submitted 1 st quarter 2012.
Multiple PS - Florida Blvd - Sherwood Forest Blvd			✓	Now called "Florida Boulevard Pump Station Improvements". Project merged with Airline/Florida Boulevard Area – PS30 Improvements & New PS project for ease of management and to eliminate construction sequencing issues. 30% design submitted and under review. 60% design expected to be submitted 2 nd quarter 2012. Design on-going.
Multiple PS - Plank Road - Thomas Road			✓	Now called "Plank Road PS Improvements". Project merged with Multiple PS – Plank Road – Harding Boulevard project for ease of management and to eliminate construction sequencing issues. Design consultant selected. Design NTP expected 1 st quarter 2012.
Multiple PS - Plank Road - Harding Boulevard			✓	Now called "Plank Road PS Improvements". Project merged with Multiple PS – Plank Road – Thomas Road project for ease of management and to eliminate construction sequencing issues Design consultant selected. Design NTP expected 1 st quarter 2012.
Multiple PS - Highway 61 - Plank Road			✓	Project definition underway. Design consultant expected to be selected 2 nd quarter 2012.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects <i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Multiple PS - Jones Creek Rd - Tiger Bend Rd			✓	<p>Project now split into 2 projects for ease of construction. Now called "O'Neal Lane Pump Station A" and "O'Neal Lane Pump Station B". Was previously called "O'Neal Lane Pump Station Improvements" which was a project that was created from merging 3 projects that included this project and both the Multiple PS – O'Neal Ln – S. Harrells Ferry Rd project and the Multiple PS – O'Neal Ln. – Interstate 10 project for ease of management and to eliminate construction sequencing issues.</p> <p>O'Neal Lane Pump Station A - 60% design expected to be submitted 1st quarter 2012. Design on-going.</p> <p>O'Neal Lane Pump Station B - 60% design expected to be submitted 1st quarter 2012. Design on-going.</p>
Airline Highway - Interstate 12			✓	<p>Now called "Airline Highway Pipeline Improvements". Project merged with both the Airline Highway – Jefferson Highway project and the Essen Lane – Interstate 12 project for ease of management and to eliminate construction sequencing issues. Project has experienced minor delays at this time due to land acquisition issues. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. 90% design submitted and reviewed. Final design expected to be submitted 1st quarter 2012. Design on-going..</p>
Florida Boulevard - Sherwood Forest Boulevard			✓	<p>Now called "Sherwood Forest Blvd – Goodwood Blvd Pipeline Projects". Project merged with Florida Boulevard - Sherwood Forest Boulevard project for ease of management and to eliminate construction sequencing issues. 15% design submitted and review is underway. 30% design expected to be submitted 1st quarter 2012. Design on-going.</p>

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Goodwood Boulevard - South Flannery Road			✓	Now called "Sherwood Forest Blvd – Goodwood Blvd Pipeline Projects". Project merged with Goodwood Boulevard – South Flannery Road project for ease of management and to eliminate construction sequencing issues. 15% design submitted and review is underway. 30% design expected to be submitted 1 st quarter 2012. Design on-going.
Joor Road - Greenwell Springs Road			✓	Design NTP issued. 15% design underway and expected to be submitted 1 st quarter 2012.
Plank Road - Port Hudson Pride Road			✓	Project definition underway. Design consultant selected. Design NTP expected 1 st quarter 2012.
Essen Lane - Highland Road			✓	Project now split into 2 projects for ease of construction. Now called "Highland Road Pipeline Improvements - A" and "Highland Road Pipeline Improvements – B". Project originally merged with Highland Road – Lee Drive project for ease of management and to eliminate construction sequencing issues; however the project has been split up into 2 phases to help shorten the contractor construction durations in order to meet the EPA milestone schedules. Highland Road Pipeline Improvements –A - 15% design underway and expected to be submitted 1 st quarter 2012. Design on-going. Highland Road Pipeline Improvements – B - 15% design submitted and reviewed. 30% design expected to be submitted 1 st quarter 2012.
Oak Villa Boulevard - Monterey Boulevard			✓	Project definition underway. Design consultant selected. Design NTP expected 4 th quarter 2011.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects <i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Lovett Road - Greenwell Springs Road			✓	<p>Now called "Lovett Road – Greenwell Springs – A" and "Lovett Road – Greenwell Springs B". This project has been split up into 2 phases to help shorten the contractor construction durations in order to meet the EPA milestone schedules..</p> <p>Lovett Road – Greenwell Springs – A - 30 % design submitted and reviewed. 60% design expected to be submitted 1st quarter 2012. Design on-going.</p> <p>Lovett Road - Greenwell Springs – B - 30% design expected to be submitted 1st quarter 2012. Design on-going.</p>
Highland Road - Lee Drive			✓	<p>Project now split into 2 projects for ease of construction. Now called "Highland Road Pipeline Improvements - A" and "Highland Road Pipeline Improvements – B". Project originally merged with Highland Road – Lee Drive project for ease of management and to eliminate construction sequencing issues; however the project has been split up into 2 phases to help shorten the contractor construction durations in order to meet the EPA milestone schedules..</p> <p>Highland Road Pipeline Improvements –A - 15% design underway and expected to be submitted 1st quarter 2012. Design on-going.</p> <p>Highland Road Pipeline Improvements – B - 15% design submitted and reviewed. 30% design expected to be submitted 1st quarter 2012.</p>
Multiple PS - Hooper Rd - Greenwell Springs Rd			✓	<p>Now called "Hooper Road PS Projects". Project merged with Multiple Booster PS – Hooper Rd – Lovett Rd project for ease of management and to eliminate construction sequencing issues. 60% design expected to be submitted 1st quarter 2012. Design on-going.</p>

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Multiple Booster PS - Hooper Rd - Lovett Rd			✓	Now called "Hooper Road PS Projects". Project merged with Multiple PS – Hooper Rd – Greenwell Springs Road project for ease of management and to eliminate construction sequencing issues. 60% design expected to be submitted 1st quarter 2012. Design on-going.
Multiple PS - Prescott Rd - Greenwell Springs Rd			✓	Project definition development underway. Design consultant selection and design NTP expected 1 st quarter 2012. Design on-going.
Multiple PS - O'Neal Ln – Interstate 10			✓	Project now split into 2 projects for ease of construction. Now called "O'Neal Lane Pump Station A" and "O'Neal Lane Pump Station B". Was previously called "O'Neal Lane Pump Station Improvements" which was a project that was created from merging 3 projects that included this project and both the Multiple PS – O'Neal Ln – S. Harrells Ferry Rd project and the Multiple PS – O'Neal Ln. – Interstate 10 project for ease of management and to eliminate construction sequencing issues. O'Neal Lane Pump Station A - 60% design expected to be submitted 1 st quarter 2012. Design on-going. O'Neal Lane Pump Station B - 60% design expected to be submitted 1 st quarter 2012. Design on-going.

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Multiple PS - O'Neal Ln - S. Harrells Ferry Rd			✓	<p>Project now split into 2 projects for ease of construction. Now called "O'Neal Lane Pump Station A" and "O'Neal Lane Pump Station B". Was previously called "O'Neal Lane Pump Station Improvements" which was a project that was created from merging 3 projects that included this project and both the Multiple PS – O'Neal Ln – S. Harrells Ferry Rd project and the Multiple PS – O'Neal Ln. – Interstate 10 project for ease of management and to eliminate construction sequencing issues.</p> <p>O'Neal Lane Pump Station A - 60% design expected to be submitted 1st quarter 2012. Design on-going.</p> <p>O'Neal Lane Pump Station B - 60% design expected to be submitted 1st quarter 2012. Design on-going.</p>
Airline/Florida Boulevard Area - PS30 Improvements & New PS			✓	<p>Now called "Florida Boulevard Pump Station Projects". Project merged with Multiple PS - Florida Blvd - Sherwood Forest Blvd project for ease of management and to eliminate construction sequencing issues. 30% design submitted and under review. 60% design expected to be submitted 2nd quarter 2012. Design on-going</p>
Multiple PS - Burbank Drive - Siegen Lane			✓	<p>Project definition underway. Design consultant selected. Design NTP Issued. 15% design expected to be submitted 1st quarter 2012. Design on-going.</p>
Central Consolidation - Central PS42		✓		<p>Now called "Pump Station 42". Final design submitted and advertisement for bids underway. Construction NTP expected early 2nd quarter 2012.</p>

TABLE 3 EPA Consent Decree RMAP2 Milestones for Category 2 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Central Consolidation - Central PS42 FM		✓		<p>Now called "Pump Station 42 Forcemain – Phase I" and "Pump Station 42 Forcemain – Phase II". Project divided into 2 projects for ease of management during construction, and so that the downstream south collection system interrelated projects won't be impacted by LSU land acquisition/construction issues.</p> <p>Phase I - Construction contractor selected. Land acquisition underway. Construction NTP expected 1st quarter 2012.</p> <p>Phase II –Additional scope added to project (FM from PS1). Land acquisition underway. Waiting on LSU. Advertisement for bids underway. Construction NTP expected 2nd quarter 2012.</p>
Central Consolidation Eastside PS's - PS 2, 3, 4, 5, 6, 7, & 10		✓		<p>Now called "Central Consolidated Pump Stations". Final design submitted and under review. Construction contractor selected. Land acquisition underway. Construction NTP expected 1st quarter 2012.</p>
Central Consolidation Eastside FM's - FM from PS 2, 3, 7, 10, & 5		✓		<p>Now called "Central Consolidated FM – Phase I and Central Consolidated FM – Phase 2". Project divided into 2 projects for ease of management and to minimize impact to businesses during construction.</p> <p>Phase I - Advertisement for bids and land acquisition underway. Construction NTP expected 1st quarter 2012.</p> <p>Phase 2 - Advertisement for bids and land acquisition underway. Construction NTP expected 2nd quarter 2012.</p>

1.2.3 Category 3: Wastewater Treatment and Storage

This category of projects includes improvements at the City/Parish WWTPs, as well as storage facilities throughout the service area. There are not any RMAP2 projects that have been identified at the North WWTP, but several projects are being done by the City/Parish to improve plant performance and odor control. Based on extensive evaluations in the *Draft*

Wastewater Master Plan (May 2008), the existing Central WWTP has insufficient flows to justify the cost of renovation and upgrading for future requirements, and will be retired when the RMAP2 projects are completed at the South WWTP. Flows predicted for the current central service area will be diverted to the South WWTP and adjustments will be made in the South WWTP improvements to handle the increased flows.

Summaries of the WWTP projects that are part of RMAP2 submittal are described below.

- The Immediate Action Plan (IAP) South WWTP Project includes screening, trickling filter recirculation pumping, primary treatment improvements, and bio-solids thickening improvements. Note that this project was made up of three separate projects that were grouped together for ease of execution and construction coordination. Also note that the effluent pumping IAP project has been completed.
- Phase 1 Improvements at the South WWTP for Wet Weather Flow including influent pumping, and screening and grit removal for a predicted flow of 345 million gallons per day (MGD). Phase 1 also includes 64 million gallons of equalization storage at the South WWTP.
- Phase 2 Improvements at the South WWTP include wet weather flow treatment with a peak capacity of 200 MGD (as previously approved in the November 2006 RMAP2).

In addition, there are storage projects sized to reduce peak flows to existing treatment plants that are also a part of this RMAP2 submittal, and are listed as follows and described in Table 4.

- South - Choctaw Storage Facility
- North - Hooper Storage Facility

These storage projects are part of the transmission system that allows for retaining (storage) of peak wet weather flows and permits that stored flow is later released for treatment at the treatment plant. All projects of this type are already underway. The details of the wastewater treatment and storage projects are listed in Table 4 below, and are current through December 31, 2011.

TABLE 4				
EPA Consent Decree RMAP2 Milestones for Category 3 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
Project Descriptions				
RMAP2 Projects				
Choctaw Storage, PS 52A, PS 51A, PS 51AA, & FMs, & Return Pipe	✓			Also called "Choctaw Storage and Pump Station Facility". Project has experienced minor delays in processing contracts and is projected to be delayed at this time. However, the City/Parish will take necessary steps in cooperation with the construction contractor to meet the planned completion date. At this time

TABLE 4				
EPA Consent Decree RMAP2 Milestones for Category 3 Projects				
<i>All RMAP2 Projects Will Have Milestone Completion Design Dates - 3rd Quarter 2013</i>				
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone	Project Status Summary
Milestone Date	4th QTR 2012	1st QTR 2014	4th QTR 2014	
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete	
				the construction contractor is projecting the project to be functionally complete prior to the EPA milestone deadline. Construction approximately 20% complete and on-going.
Hooper Storage	✓			The project has been delayed at this time due to concerns of the residents in this North area of the City/Parish, which resulted in choosing a new location on the BTR Regional Airport land. This land acquisition issue has resulted in significant delays resulting in revised design contracts. Location has changed 3 times due to these unforeseen circumstances beyond control of the City/Parish. The anticipated completion of construction is 1 st quarter 2014. The City/Parish is making every effort to expedite the re-design and construction. The City/Parish is currently, negotiating a design supplement with the design consultant. 90% design Submitted and reviewed. Final design expected to be submitted 1 st quarter 2012. Advertisement for bids expected to be underway 1 st quarter 2012. Design on-going.
South WWTP IAP Consolidated – Screening, Primary Treatment, Trickling Filter Recirculation, Sludge Handling	✓			Project completed – 2nd quarter 2011.
South WWTP IAP- Effluent Pumping Improvements	✓			Project completed – 1st quarter 2008.
South WWTP - Phase 1		✓		Also called “SWWTP Wet Weather Improvements -Phase I”. Construction is approximately 50% complete and is on-going.
South WWTP - Phase 2			✓	Also called “SWWTP Wet Weather Improvements - Phase II”. Advertisement for bids underway. Construction NTP issued. Contractor expected to mobilize 1 st quarter 2012

1.3 Infiltration and Inflow Reduction Activities Summary

Another part of the Collection System Remedial Program identified in the Consent Decree Section XII is capital infiltration/inflow (I/I) reduction activities. Pursuant to item 35 in Section XII, the City/Parish is required to spend at least \$3 million annually for sewer repairs, sewer rehabilitation, and other capital expenditures related to reducing I/I in the North, South, and Central WWTP collection systems. All goals were exceeded. The City/Parish was in compliance with Section XII Collection System Remedial Program during this reporting period. There were no problems encountered in the Collection System Remedial Program during this reporting period and non-compliance is not anticipated during the next reporting period. Table 5 identifies the funds expended during 2011 to meet this requirement.

TABLE 5				
I/I Reduction Activities Summary – Data through December 31, 2011				
Project	Description	% Complete	Contract Amount	Expenditures 2011
08-PI-UF-051	Physical Inspection of the Existing Sanitary Sewers	100%	\$2,922,437	\$2,900,000
07-PN-UF-0041	Annual CDR Point Repair Project	100%	\$998,303	\$910,237
TOTAL EXPENDITURES IN 2011			\$3,920,740	\$3,810,237

2. Treatment Facility Assessment

Pursuant to Consent Decree Section XIII, Remedial Measure Treatment Facility Assessment, no later than March 30, 2002 the City/Parish was to submit a Treatment Facility Assessment report which assesses the treatment capabilities of the North, South, and Central WWTPs. The City/Parish submitted *Treatment Facility Assessment Report* on March 26, 2002 in conjunction with MWH. It was determined in the original *Treatment Facility Assessment Report* that all process units and conveyance elements had capacity for current and projected design flows at all three WWTPs and no WWTP facility improvements or expansion were required. The *Treatment Facility Assessment Report* also indicated that the monthly Operators Process Control meetings led by Dr. John J. Sansalone of LSU were having a beneficial impact on plant performance.

Since that time, there have been additional engineering assessments and studies of the WWTPs which resulted in the need for treatment plant improvements at the South WWTP which are now included in the RMAP2 projects presented in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008) and approved by the *Agreement and Order Regarding the Modification of the Consent Decree - Civil Action No. 01-978-B-M3 (M.D. La.)* signed in April 2009.

The City/Parish submitted Municipal Water Pollution Prevention (MWPP) Environmental Audit Reports for the North, South, and Central WWTPs on November 7, 2011 (see *Attachment C: MWPP Audit Reports - South, North, and Central WWTPs*). These reports contain an evaluation and rating for influent loadings, plant performance, overflows and bypasses, treatment plant age, sludge disposal, new development in collection system, and operator certification training for the North, South and Central WWTPs. The MWPP audit rated the

treatment plants on the aforementioned factors for the year following the entry into the Consent Decree. The actions that will be taken to maintain compliance and prevent effluent violations are presented in MWPP resolutions, which were submitted along with the audit. Some of those actions include managing a project to reduce the high concentration of hydrogen sulfide at the North and South treatment plants, in addition to those projects identified in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008) in all three WWTP collection system areas.

3. Environmental Results Monitoring

Pursuant to Consent Decree Section XIV, Remedial Measures – Environmental Results Monitoring Plan, the City/Parish shall implement the Environmental Results Monitoring (ERM) Plan attached in Consent Decree Exhibit G. The objective of the ERM program is to measure the environmental benefits from the Work performed under the Consent Decree through measurement of water quality improvements. The impact of the work throughout the City/Parish is tested by monitoring sewage indicating pollutants in major receiving waters prior to and following completion of remedial measures within each drainage basin. The original plan outlines four sampling locations, including all major tributaries in East Baton Rouge Parish, which enter the Amite River System – and eventually Lake Pontchartrain.

The Phase I Baseline Monitoring was completed during the 2004 reporting period. The Phase II Results Monitoring will begin 6 months following completion of all remedial measures within a specified drainage area contributing to an identified sampling location.

4. Interim Relief Measures Activities

Paragraph 39 of the Consent Decree provides interim effluent limits of 75% removal of BOD and TSS (based on 30-day average removal rates), until completion of all RMAP construction projects, as an interim relief to the 85% removal requirement of the three WWTP National Pollution Discharge Elimination System (NPDES) permits.

4.1 North WWTP

During 2011, the North WWTP has been in compliance with the 75% interim effluent limits for the entire 12 months of the reporting period for both removal of BOD and TSS. In fact, the North WWTP met the permit limit of 85% removal for TSS for 10 months, and it also met the permit limit for 85% removal of BOD for 5 months, as illustrated by Table 6. There were no compliance issues reported at the North WWTP during the third and fourth quarters of 2011.

During the first and second quarterly reporting periods of 2011, a project to replace the primary clarifiers inlet valves was underway, which resulted in several basins being out of service. The project was actually completed at the end of April 2011.

4.2 Central WWTP

The Central WWTP has been in compliance with the 75% interim effluent limits for removal of TSS and BOD for all 12 months during this reporting period. The Central WWTP also has met the permit limit of 85% removal of TSS for all 12 months and BOD for 5 months as illustrated by Table 6. There were not any compliance issues reported at the Central WWTP during the third and fourth quarters of 2011.

During the first quarterly reporting period of 2011, the Central WWTP experienced sludge build-up in the chlorine contact chamber which was resolved.

Also, during the second quarterly reporting period there was a power failure at the Central WWTP and a chlorinator malfunction which was repaired.

4.3 South WWTP

The South WWTP has been in compliance with the 75% interim effluent limit and 85% limit for TSS all 12 months during this reporting period. The South WWTP also met the 75% effluent limit for BOD for 11 months of the year, and it met the 85% effluent limit for BOD for 2 months. There were not any compliance issues reported at the South WWTP during the second and third quarters of 2011.

During the first quarterly reporting period of 2011 Primary Basin (#5 and 6), Force Main Trickling Filters (#5 through #8), and Final Clarifiers (#5 through #8) were all out of service due to scheduled outages by the contractor for the SWWTP Immediate Action Plan Projects.

Also, during the fourth quarterly reporting period the South WWTP experienced some operational issues which were resolved.

More details can be found in the Quarterly EPA Reports from 2011. The South Plant's performance should improve further with the completion of the RMAP2 projects.

TABLE 6 2011 Monthly Average Percent Removal												
	Jan.	Feb.	Mar.	April	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
North Plant-LA0036439												
BOD	85	83	82	82	78	80	87	89	89	88	84	83
TSS	89	88	86	83	81	89	94	94	89	92	87	89
Central Plant-LA0036421												
BOD	75	79	80	80	85	82	81	86	87	88	85	84
TSS	90	92	92	92	92	93	94	95	93	94	93	92
South Plant-LA0036412												
BOD	71	80	83	80	83	81	80	85	85	82	82	79
TSS	87	93	93	90	92	94	94	94	92	93	91	90

5. Outreach and Public Awareness Program

Consent Decree Section XV - Outreach and Public Awareness Plan requires the City/Parish DPW to implement and follow the Outreach and Public Awareness Program Plan attached in Exhibit H of the Consent Decree. The Outreach and Public Awareness Program Plan was updated in December 2007 and has been completed and reviewed/approved by the City/Parish and can be found here in *Attachment D: Updated Outreach and Public Awareness Plan*, or also in *Attachment 1: Updated Outreach and Public Awareness Plan and RMAP1 Completion Report* located at the end of the 36th Quarterly EPA Report.

Outreach and Public Awareness Program Plan implementation efforts have been on-going. Public information tools such as the website <http://www.brprojects.com/SSOProgram/Default.aspx>

are being continuously updated with new information about the program, public meetings, project information (including monthly progress reports detailing the status of the projects), regulatory information and associated reference documents, and news articles about the SSO Control and Wastewater Facilities Program, etc.

Fact sheets have been developed on the SSO Program and for individual projects, as well as public education brochures giving information about SSOs, and are regularly distributed at public meetings and can be accessed as well via the website. These materials describe pertinent information and aspects about the City/Parish SSO Control and Wastewater Facilities Program. Program staff regularly attends Metro Council meetings, and have given presentations at numerous other public meetings, such as the growth coalition, technical professional societies, and other economic and planning groups throughout the City/Parish. Additionally, prior to any field work commencing in areas, informational door hangers are hung on those homes where inspection work will be taking place or where residents may experience construction impacts.

Also the SSO Control and Wastewater Facilities Program Monthly Progress Reports have been made available and distributed to the public. The Monthly Progress Reports are available on the program web site posted on the website for the public to download at their convenience and are always distributed to City/Parish and DPW staff. In addition the Monthly Progress Reports are also distributed to a mailing list that includes community and civic leaders and interested members of the public. These reports are distributed at public meetings in Council Districts throughout the Parish and are available to the public as handouts at the City/Parish Department of Public Works office.. The plan is for these reports to continue to be distributed to those on the master list and posted on the website; in addition they will also be handed out or mailed to anyone who requests them throughout the duration of the SSO Control and Wastewater Facilities Program.

SSO program communications continue to provide City/Parish residents with time critical information on SSO Control and Wastewater Facility Program projects, educational information on SSOs, and updates on the status of the Program and related projects. In close collaboration with the Office of the Mayor-President and the Department of Public Works, the Program has initiated a construction communication outreach component to complement the Program's current communication activities. The Program Communication Team has designed and distributed a variety of outreach materials. A telephone hotline for residents to call with questions was developed and coordination between the SSO Program and the Parish's 311 call center was established. Additionally, materials including information letters and handouts, door hangers announcing road closures, were developed and are continuing to be distributed.

The information presented in this section demonstrates that the City/Parish has been in compliance with Section XV Outreach and Public Awareness Program during the reporting period.

6. Plan Modification Needs

The City/Parish has not identified any deficiencies in the Cross Connection Elimination Plan, the Preventive Maintenance Program, the Sanitary Sewer Overflow Response Plan, or the Remedial Measures Action Plan.

7. Stipulated Penalties

Table 7 presents a summary of submittal and construction milestone dates subject to stipulated penalties in accordance with Section XXI of the Consent Decree. As of December 31, 2011, no submittal milestone deadlines have been missed.

Non-compliance items, which are subject to stipulated penalties in accordance with Section XXI of the Consent Decree, are identified in each Consent Decree Quarterly EPA Report. A summary of penalties assessed and paid by the City/Parish and a cumulative summary of penalties assessed and potential stipulated penalties reported in past quarterly reports from 2011 are presented in Tables 7 and 8.

TABLE 7 Penalties Assessed and Paid by the City/Parish to Date			
Penalties	Assessed	Paid	
		US DOJ	LDEQ
Civil Penalties	\$729,500	\$364,750	\$364,750
Past Stipulated Penalties (1988 Consent Decree)	\$216,000	\$216,000	
Note: These monetary stipulated penalties have been already paid by the City/Parish in 2002.			

TABLE 8			
Self-Reported Potential Stipulated Penalties 2011 (SSOs and WWTP violations)			
Stipulated Penalties	Number	Cost Per Occurrence	Amount Accrued
Unauthorized Discharges 2011			
Less than 1 MG & Non-Compliance with the Collection System Preventative Maintenance Plan	0	\$5,000	\$0
Less than 1 MG & Non-Compliance with the Sanitary Sewer Overflow Response Plan	0	\$5,000	\$0
1 MG or more	3	\$5,000	\$15,000
Non-Compliant Discharges (WWTP) 2011			
Weekly Average Limits	4	\$1,000	\$4,000
Monthly (30-day average) Limits	7	\$2,500	\$17,500
2011 Total Stipulated Penalties (through December 31, 2011)			\$36,500
<p>Note: None of these self-reported stipulated penalties in this table have been assessed to the City/Parish by the DOJ/EPA/LDEQ or have been paid by the City/Parish at this time. Historical data utilized in this table was taken from the City/Parish Quarterly EPA Reports.</p>			

Attachment A
RMAP1 Completion Report

Memorandum

RMAP1 Completion Report

TO: DOJ
EPA
LDEQ

FROM: City/Parish DPW

COPIES CH2M HILL

DATE: April 18, 2011

Pursuant to Consent Decree Section XVIII - Reporting as of the end of the 1st quarter of 2011, the City/Parish asserts that all of the RMAP1 projects have been functionally completed.

As of the end of the first quarter of 2011 all of the RMAP1 projects have been substantially completed, and 13 of the 14 were completed either on, or ahead of, schedule. The Industriplex Project has had several issues arise during the construction phase pertaining to unavoidable utility conflicts, difficult easement acquisitions, alignment changes, and permitting and other utility coordination issues that have caused significant delays with the project which could not be overcome by reasonable actions by the City/Parish and its construction contractor. At this time, this project is also functionally completed and in operation. The City/Parish asserts that this project is not susceptible to stipulated penalties due to the circumstances of the delay beyond the control of the City/Parish. The circumstances behind the delay are explained in detail below and have been also mentioned in the previous Quarterly EPA Reports.

During 2nd quarter 2009 the construction contract was awarded and NTP for construction was issued. Soon after the contractor began work, he discovered that there was a utility conflict with AT&T which took more than 9 months to resolve. During the same quarter as the contractor began working, he was trying to obtain gas line encroachment permits and was not granted a permit for several of the sewer stretches included in the project. A re-design of the route/alignment was required which resulted in land acquisition (servitude) issues. As construction and land acquisition progressed in 2009 and even in the 2nd quarter of 2010, it became more difficult to obtain servitudes for several properties due to the gas line re-alignment changes since several of the properties had multiple (30 - 120) owners and clear title to the property was unobtainable by normal procedures. This resulted in a huge undertaking on the City/Parish's part to obtain the servitudes needed while the construction was underway. It also required the City/Parish invoke different processes under Louisiana law (out of the norm) for obtaining these easements for the project. Later in the 3rd and 4th quarters of 2009 the contractor ran into some additional delays with obtaining permits from the Louisiana Department of Transportation and Development (DOTD), and also had encountered more land acquisition issues. In one of these cases, a property owner wouldn't negotiate the servitude purchase with the City/Parish which eventually resulted in another re-design and re-route of the piping alignment causing again another delay. In

the 2nd quarter of 2010 it was thought that all land issues were resolved until the contractor ran into the servitude issues again due to the gas pipeline permit realignment already discussed. During the 3rd quarter of 2010 the project was approximately 90% complete. Once construction was completed, it then took Entergy (the electric utility) nearly 8 weeks to get power to the pump station as they ordered the wrong size transformer for pump station. Power is now at the pump station so it is functionally complete and wastewater is flowing.

The status of the RMAP1 projects is presented in Table 1 and is current through March 31, 2011.

TABLE 1 EPA Consent Decree RMAP1 Milestones				
Milestone Date		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
Consent Decree Projects	Corresponding City/Parish Projects			
RMAP1 Projects				
N-05 PS 24 Area Upgrades	*PS 24/43 Area Upgrade (01-RMP-N05)	✓		
N-06 PS 43 Area Upgrades				
N-09 PS 44/46 Area Upgrades	PS 44/46 Area Upgrades (01-RMP-N09)	✓		
N-10 PS 240 Area Upgrades	PS 240 Area Upgrades (01-RMP-N10)	✓		
***N-99 North Further Investigations	NTSN SS Eval. Study (99-RMP-N-99)	✓		
	**Bellingrath Rehab. (03-RMP-N14) (NSRP)	✓		
	**Frenchtown Road Sewer Rehab. (03-RMP-N15)	✓		
	**North Area Comprehensive Rehab. (03-RMP-N23)	✓		
	**PS 45 Area Rehab. (00-RMP-N31)	✓		
C-03 PS 2 Area Rehabilitation	PS 2 Area Upgrades (01-RMP-C03)	✓		
S-01B SWWTP Influent PS	SSO SWWTP Infl. PS Upgrade (99-RMP-SO1B)	✓		
S-11 PS 40 Area Rehabilitation	S-11 PS 40 Area Rehabilitation	✓		
***S-99 South Further Investigations	SSO Engr-South (99-RMP-S99)	✓		
	PS 944 Area Upgrade Grv Sewer (99-RMP-S99)	✓		
	PS 944 Area Upgrade (99-RMP-S99)	✓		
	PS 177 Area Upgrade (99-RMP-S99)	✓		

TABLE 1 EPA Consent Decree RMAP1 Milestones				
Milestone Date		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
Consent Decree Projects	Corresponding City/Parish Projects			
RMAP1 Projects				
	**PS 211 Area Upgrades (99-RMP-S11)	✓		
N-01 Choctaw Basin Return System	Choctaw Area Storage (04-RMP-N22)			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage.
N-13 North Choctaw Basin System	S-05 PS 58B Area Upgrades MWH RMAP2			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage PS.
N-04 PS 47 Area Upgrades	N-04 PS 47 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-07 PS 39/55 Area Upgrades	N-07 PS 39/55 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-11 PS 65 Area Upgrades	PS 65 and 65A Area Upgrades (01-RMP-N11)			Project suspended. Evaluated for inclusion in RMAP2 and Master Plan. Project proposed as a part of the Master Plan.
N-02 PS 49/52 Area Upgrades	PS 49/52 Area Upgrade (01-RMP-N02)		4 th Quarter 2008	Project completed – 4th quarter 2008 (at 80% complete with construction). Project was in dispute with construction contractor. Both parties reached an agreement on terms and job was closed at 80% complete.
N-12 North Sewer Rehab Projects	North Sewer Rehab Projects (03-RMP-N12)		4 th Quarter 2007	Project completed – 4th quarter 2007.
S-08 Industriplex Area Upgrades	Industriplex Area PS 355 and FM Upgrades (99-RMP-S08)		2 nd Quarter 2010	Project completed – 1st quarter 2011. Final change order prepared and submitted. This project has had delays early on in the construction phase due to land acquisition issues and utility conflicts.
S-14 Kleinpeter Area Upgrades	Kleinpeter Area Upgrades (03-RMP-S14)		2 nd Quarter 2010	Project completed – 2nd quarter 2009.

TABLE 1 EPA Consent Decree RMAP1 Milestones				
		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
Milestone Date		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
Consent Decree Projects	Corresponding City/Parish Projects			
RMAP1 Projects				
S-16 PS 136 Area Upgrades	PS 136 Area Upgrades (99-RMP-S16)		2 nd Quarter 2010	Project completed – 2nd quarter 2010. Construction completed. Final change order approved.
<p>* This project was executed as a combination of two RMAP1 projects</p> <p>** These projects were added as RMAP1 projects by the City/Parish after entry into the Consent Decree</p> <p>*** This RMAP1 project was split up into multiple projects for better execution</p>				

Attachment B
Request for Time Extension/Modification of the
Compliance Schedule in the Approved RMAP2
Submittal



Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, La 70821

July 1, 2011

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

Re: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3
Request for Time Extension/Modification of the Compliance Schedule in the Approved RMAP2 Submittal - Consent Decree Section XII (Remedial Measures – Collection System Remedial Program) Paragraph 34-D-iii, and Section XXII (Force Majeure)

Gentlemen:

The City of Baton Rouge and Parish of East Baton Rouge (City/Parish) hereby requests a three (3) year schedule extension and corresponding modification of the approved Second Remedial Measures Action Plan compliance schedule submitted by the City/Parish in September 2008 [report titled - *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program*] which was adopted in the *Agreement and Order Regarding the Modification of Consent Decree* (April 2009) by the Department of Justice (DOJ), United States Environmental Protection Agency (EPA), and Louisiana Department of Environmental Quality (LDEQ).

This current extension request and corresponding updated compliance schedule will extend the final compliance date to January 1, 2018. This extended compliance date falls within the 10 - 15 year implementation period for RMAP2 completion for a medium burden utility. The revised schedule includes significant project scope additions (primarily including projects at the North Wastewater Treatment Plant, and for implementation of the supervisory control and data acquisition (SCADA) remote monitoring and telemetry, and Emergency Generators at over 400 pump stations throughout the City/Parish, et. al.) which were not included in or required by the Consent Decree, or mentioned in the approved RMAP2 projects submitted in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). Note that this request for extension will not change the objectives stated in Section V of the Consent Decree, or the scope of projects originally adopted by the *Agreement and Order Regarding the Modification of Consent Decree* (April 2009) that are described in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). All of the original projects will be

completed (if not already functionally complete) and only the lower priority projects will have schedules that extend beyond the original deadline.

The City/Parish is proposing compliance schedule project adjustments to defer the lower priority rehabilitation projects and those capacity projects in the upper reaches of the system, while accelerating the needed additional North Wastewater Treatment Plant (NWWTP) Master Plan projects. The original compliance schedules for the major South Wastewater Treatment Plant projects and critical capacity projects that should most effectively reduce overflows and ensure wastewater treatment plant permit compliance will be maintained. Since 2008, the City/Parish has already drastically reduced the number and volume of SSOs throughout the City/Parish (see Attachment 3 Exhibit B and C for more details).

The new information that forms the basis for this request has been recently discussed with LDEQ, and they have advised the City/Parish that they are supportive of this request that assigns a higher priority to NWWTP improvements. Both the City/Parish and LDEQ agree that the work at the NWWTP should be accelerated and included in this submittal. However, without adjustments to the other already approved RMAP2 compliance schedule, and a quick approval of the revised RMAP2 compliance schedule attached herein, it won't be feasible to accelerate the additional projects, and these NWWTP Plant Master Plan projects would otherwise be deferred to begin until 2015 and beyond.

The City/Parish and Program Manager have also just completed a major mid-program review of status and progress, identifying critical elements and issues that affect the Program's success. The results of this review were recently presented to both LDEQ and EPA. The City/Parish and CH2M HILL (the current Program Manager) believe that some schedule adjustments are needed to better manage the "bubble" of projects that will be under construction in late 2012 and 2013 highlighted in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). The City/Parish has been working under a compressed compliance schedule while executing these projects since 2008, given that there is only 6 years from the 2008 RMAP2 Submittal through the existing program completion compliance deadline of January 1, 2015. See Figure 1 below for more details.

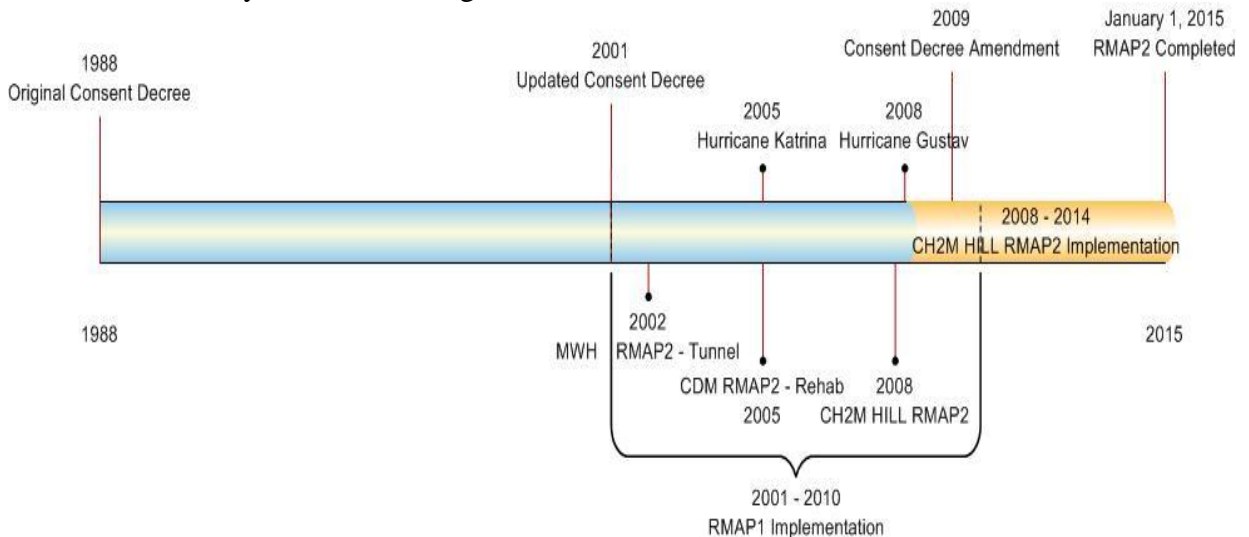


Figure 1 –Existing Compliance Timeline

The compressed compliance schedule has caused a “bubble” of projects that threatens to overwhelm the capacity of the administrative and technical resources that are realistically available. This situation is largely due to the delays in the early program, including impacts from hurricanes and other environmental disasters that impacted the Baton Rouge area (Hurricanes Katrina/Rita – 2005, Hurricane Gustav/Ike – 2008). Many of these force majeure events significantly affected project planning, design, easement and right of way acquisition. The City/Parish and Program Manager have worked hard to deal with these delays throughout the life of the program; however, it created an unbalanced construction schedule in the last three years that creates funding and construction management issues. It also will be highly disruptive to the City/Parish community due to the large number of projects concurrently under construction (see Attachment 3- Program Status Data/Case Memo Exhibit A - SSO Program Construction Peak Map for more details).

In addition, the City/Parish has letter correspondences and meeting minutes taken from July 2007 and February 2008, respectively, in which the DOJ/EPA agree to consider an extension request due to these force majeure events at a later date when Program progress could be better evaluated. The City/Parish requests that this be done at this time. Excerpts from the letter and the call notes are below:

July 10, 2007 EPA Letter (see Attachment 6 – EPA Letter for more details)

In various discussions between the Parties, the City/Parish requested that some flexibility be added to the 2002 Consent Decree to allow EPA and LDEQ to grant extra time to complete the Second RMAP in an effort to compensate for potential delays caused by the aftereffects of the 2005 Hurricanes Katrina and Rita. The Parties have discussed this issue and agreed to address the issue of the aftereffects of the 2005 Hurricane season in a proposed Agreement and Order Regarding Modification of the Consent Decree. The City/Parish will continue to document Hurricane Katrina related issues, and if they encounter problems as the execution of the RMAP’s progress they will document the problems and request an amendment to the Consent Decree at that time.

February 12, 2008 Call Notes

In previous discussions and reports, the possibility of amending the Consent Decree and to what extent to amend it, has been mentioned. The only item remaining would be to address the delays due to the aftermath of hurricanes (such as Katrina, etc.). DOJ/EPA/LDEQ weren’t sure that amending the Consent Decree at this time (2008) was necessary. The City/Parish and DOJ/EPA/LDEQ agreed that that City/Parish would continue executing the RMAP’s as expected and as quickly as possible. The City/Parish will continue to document force majeure related issues, and if they encounter problems as the execution of the RMAP’s progress they will document the problems and request an amendment to the Consent Decree at that time.

The City/Parish has also recently performed an affordability analysis using EPA criteria outlined in the *EPA Combined Sewer Overflows Guidance for Financial Capability Assessment and Schedule Development* (1997) document and has determined that any additional rate increases (in addition to the initial 95% rate increase phased-in from 2000 – 2002, the 10% rate increase in 2003, and then the annual 4% rate increases that have been made every year since 2004 which are scheduled in every year for the remainder of the program) are not feasible and would put a **high burden** on the community in difficult economic times, especially the **low**

July 1, 2011

income population (which totals approximately **40%** of the population of the City/Parish) that would be disproportionately impacted.

The City/Parish has put together a number of attachments listed below, which are also included with this submittal for the benefit of DOJ and EPA to help ensure a timely response to the three year extension request.

It is very important that the City/Parish get approval of the extension and updated compliance schedules and resolve these issues at the soonest possible date, in order for the schedule adjustments to have the desired benefits. The City/Parish requests a meeting discussing this submission with DOJ, EPA, and LDEQ as soon as possible, in order to ensure a timely response to this three (3) year extension request.

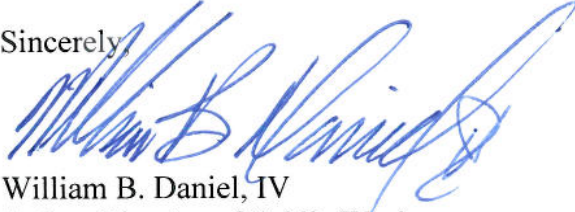
Summary of Attachments

- 1 – Proposed EPA Compliance Schedule
- 2 – Voluntary RMAP2 Scope Addition Memo
- 3 – Program Status /Case Memo and Exhibits
- 4 – Affordability Analysis
- 5 – LDEQ Emergency Administrative Orders
- 6 – July 10, 2007 EPA Letter

July 1, 2011

I certify that the information contained in or accompanying this document is true, accurate and complete. As to 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,



William B. Daniel, IV
Acting Director of Public Works

Cc: Honorable Melvin L. "Kip" Holden, Mayor-President
Mr. John Carpenter, Chief Administrative Officer
Mr. Michael Donnellan, US DOJ
Dr. Al Amendariz, US EPA Region 6 Regional Administrator
Mr. Lawrence Starfield, US EPA Region 6 Deputy Regional Administrator
Mr. John Blevins, US EPA Region 6 Compliance Division Director (CEN)
Ms. Suzanne Murray, US EPA (6RC)
Ms. Cheryl Seager, US EPA (6RC-E)
Ms. Carol Peters-Wagnon, US EPA (6EN-WM)
Ms. Mona Bates, US EPA Region 6
Mr. Carlos Zequeira, US EPA (6RC-EA)
Ms. Gladys Gooden-Jackson, US EPA (6EN-WC)
Mr. Scott McDonald, US EPA Region 6
Mr. Rusty Herbert, US EPA Region 6
Ms. Peggy Hatch, LDEQ
Ms. Cheryl Nolan, LDEQ
Mr. Perry Theriot, LDEQ
Mr. Ted Broyles, LDEQ
Ms. Celena Cage, LDEQ
Mr. Mary Roper, Parish Attorney
Mr. Bob Abbott, Parish Attorney's Office
Mr. Bryan Harmon, DPW
Mr. Jim Ferguson, DPW
Mr. Mark LeBlanc, DPW
Mr. David Guillory, DPW
Mr. Michael Ellis, CH2MHILL
Mr. Jim Hawley, CH2M HILL
Mr. Jim Hawkey, CH2M HILL
Ms. Jennifer Baldwin, CH2M HILL
Mr. Gordon Garner, CH2M HILL
Ms. Karen Johnson, CH2M HILL



Consent Decree Extension Request for the Baton Rouge Sanitary Sewer Overflow (SSO) Control and Wastewater Facilities Program

Prepared for
City of Baton Rouge/East Baton Rouge Parish
Department of Public Works
June 2011



Prepared by
CH2MHILL

in association with Sigma Consulting Group, Inc.

Attachment 1
Proposed EPA Compliance Schedule

Attachment 1 – Proposed EPA Compliance Schedule

This attachment is proposed to replace the City/Parish’s compliance schedule submitted by the City/Parish in September 2008 [report titled - *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program*] which was adopted in the *Agreement and Order Regarding the Modification of Consent Decree* (April 2009) by DOJ, EPA, and LDEQ. This revised EPA milestone compliance schedule is depicted in Tables 1, 2, and 3.

The revised milestone schedule includes significant project scope additions to the RMAP2 program which were not included in, or required by the Consent Decree, or mentioned in the approved RMAP2 projects submitted in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). See Attachment 2 – Voluntary RMAP2 Scope Addition Memo for the details about the projects that have been added to the scope of the RMAP2 program, which now will have EPA milestone schedules summarized in the tables below. Note that all of the original projects included in the previously approved RMAP2 will still be completed. Only the lower priority projects will extend beyond their original deadlines.

The City/Parish is proposing compliance schedule project adjustments to defer lower priority rehabilitation projects and those capacity projects in the upper/outer reaches of the system, while accelerating the needed additional North Wastewater Treatment Plant Master Plan projects, and thereby maintaining the original compliance schedules for the major wastewater treatment plant projects and critical capacity projects that should most effectively reduce overflows and ensure wastewater treatment plant permit compliance.

Category 1: Comprehensive Sewer Basin Rehabilitation

Based on sewer system digital model analysis and flow monitoring, several sub-basins within the collection system require comprehensive rehabilitation. Sewer system comprehensive rehabilitation projects will be implemented to repair or replace components of the system that are defective and permit excessive infiltration and inflow.

Overall, all of the rehabilitation projects were prioritized by working first in the outer areas of the City/Parish and then moving in. However at the same time those areas with a greater frequency of SSO’s were started in advance of those areas with less frequency, so in some cases projects were started closer to the WWTP first if they have high frequencies of SSOs. This logic was continued with the first draft of extension schedule, so those projects that are being adjusted with the extension will be in areas with a lesser frequency of SSO’s.

Table 1 presents the Category 1 comprehensive rehabilitation projects and anticipated delivery milestone schedules. Note that any pump station improvements are included in the projects listed in Category 2, Pump Station and Transmission Improvements on the following pages.

TABLE 1			
Updated EPA Consent Decree RMAP Milestones for Category 1 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Project Descriptions RMAP2 Projects			
Jefferson Hwy – HooShooToo Road	✓		
Staring Lane – Boone Drive Area Rehabilitation Project	✓		
Burbank Drive – Gardere Lane Area Rehabilitation Project	✓		
Oak Villa –Choctaw Street Area Rehabilitation Project	✓		
Scotland Avenue – Progress Road Area Rehabilitation Project	✓		
Elm Grove Garden Road – Harding Boulevard Area Rehabilitation Project	✓		
Sharp Road – Florida Boulevard Area Rehabilitation Project	✓		
Kenilworth Boulevard – Boone Drive Area Rehabilitation Project	✓		
Foster Drive - Government Street Area Rehabilitation Project Phase A and B	✓		
Silverleaf Road – Ford Street Area Rehabilitation Project	✓		
Brookstown Road - Evangeline Street Phase I Area Rehabilitation Project	✓		
Brookstown Road – Evangeline Street Phase II Area Rehabilitation Project	✓		
Bluebonnet Blvd – Jefferson Hwy Phase I Area Rehabilitation Project		✓	
Bluebonnet Blvd – Jefferson Hwy Phase II Area Rehabilitation Project		✓	
Highland Road – Washington Street Area Rehabilitation Project		✓	
Standford Avenue – Morning Glory Road Area Rehabilitation Project	✓		
Airline Highway – Goodwood Blvd Phase I Area Rehabilitation Project		✓	
Airline Highway – Goodwood Blvd Phase II Area Rehabilitation Project		✓	
Acadian Thruway – Claycut Road Area Rehabilitation Project		✓	
Acadian Thruway – Perkins Road Area Rehabilitation Project	✓		
Antioch Road – Chadsford Drive Area Rehabilitation Project		✓	
Jones Creek Road – Tiger Bend Road Area Rehabilitation Project			✓
Scenic Highway – Spanish Town Road Phase I Area Rehabilitation			✓

TABLE 1			
Updated EPA Consent Decree RMAP Milestones for Category 1 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Project			
Scenic Highway – Spanish Town Road Phase II Area Rehabilitation Project			✓
Siegen Lane – Interstate 10 Area Rehabilitation Project			✓
Interstate 110 – Hollywood Street Area Rehabilitation Project			✓
Ardenwood Drive – Winbourne Street Area Rehabilitation Project			✓
Flannery Road – Florida Boulevard Area Rehabilitation Project			✓
East Boulevard – Government Street Area Rehabilitation Project			✓
North 38th Street – Gus Young Avenue Area Rehabilitation Project			✓
*Note that the column and corresponding check-marks highlighted in yellow depict those projects whose milestone schedules will be completed outside of the current January 1, 2015 100% milestone.			

Category 2: Pump Station and Transmission Improvements

The Infoworks™ digital wastewater model was used to identify necessary increases in capacity of existing gravity trunk sewers, pump stations, and force mains in order to accommodate peak wastewater flows remaining in the rehabilitated collection system. Table 2 presents a list of Category 2 projects with corresponding milestone schedules.

TABLE 2			
Updated EPA Consent Decree RMAP Milestones for Category 2 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Project Descriptions RMAP2 Projects			
Capitol Lake – Gayosa Street Area Capacity Improvements	✓		
Gurney Road - Joor Road	✓		
Sullivan Rd./Lovett Rd./Wax Rd. Sewer Upgrades	✓		
Comite Road – Foster Road Sewer Area Upgrades - Phase I	✓		
Comite –Foster Road Sewer Area Upgrades - Phase II	✓		
Foster Road – Hooper Road Sewer Area Upgrade	✓		
Zachary Area Transmission Network Improvements Phase I - 3 Pump Stations and Equalization Basin		✓	
Zachary Area Transmission Network Improvements Phase II – Red Mud Lakes Forcemain to NWWTP		✓	
Zachary Area Transmission Network Improvements Phase III – Forcemain to Highway 964 to Red Mud Lakes		✓	
Zachary Area Transmission Network Improvements Phase IV – Zachary Improvements		✓	
South Boulevard – St. Joseph Street Sewer Area Upgrades	✓		
Downtown Area Pump Station Improvements		✓	
Highland Road – Buchanan Street Sewer Area Upgrades	✓		
Citiplace/Essen Area - PS119 & Forcemain Improvements	✓		
Group Project 1A (Metro Airport Sewer Upgrades)		✓	

TABLE 2			
Updated EPA Consent Decree RMAP Milestones for Category 2 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Group Project 1B (Metro Airport Sewer Area Pump Station & Forcemain Upgrades)		✓	
Perkins/Old Perkins Area - Booster PS 514 Improvements		✓	
Group Project 2 (Old Perkins – Highland Road Area Upgrades)	✓		
Highland Road – Burbank Drive Capacity Improvements		✓	
Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase A		✓	
Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase B		✓	
Bayou Duplantier Area Sewer Upgrades		✓	
25th Street - North Acadian Thruway	✓		
Government St - South Acadian Thruway Sewer Area Upgrades		✓	
Plank Road – Kleinpeter Road Sewer Area Upgrades		✓	
O’Neal Lane Pipeline Improvements – Group A		✓	
O’Neal Lane Pipeline Improvements – Group B		✓	
Multiple PS - Nicholson Dr - Brightside Dr		✓	
Pump Station 58 Capacity Improvements		✓	
Staring Lane FM (Phase I - Burbank Drive to Highland Road)	✓		
Staring Lane FM (Phase II - Highland road to Perkins Road)		✓	
Staring Lane FM (Phase III - Perkins to PS58)		✓	
Multiple PS - Jefferson Hwy - Park Forest Dr		✓	
Airline Highway Pipeline Improvements			✓
Multiple PS - Highland Road - Kenilworth Parkway			✓

TABLE 2			
Updated EPA Consent Decree RMAP Milestones for Category 2 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Florida Boulevard Pump Station Improvements			✓
Plank Road Pump Station Improvements			✓
Multiple PS - Highway 61 - Plank Road			✓
O'Neal Lane Pump Station Improvements – Group A			✓
O'Neal Lane Pump Station Improvements – Group B			✓
Sherwood Forest Blvd – Goodwood Blvd Pipeline Improvements			✓
Joor Road - Greenwell Springs Road Sewer Area Upgrades			✓
Plank Road - Port Hudson Pride Road Sewer Area Upgrades			✓
Highland Road Pipeline Improvements - Group A			✓
Highland Road Pipeline Improvements - Group B			✓
Oak Villa Boulevard - Monterey Boulevard Sewer Area Upgrades			✓
Lovett Road – Greenwell Springs Road Sewer Area Upgrades – Group A			✓
Lovett Road – Greenwell Springs Road Sewer Area Upgrades – Group B			✓
Hooper Road Pump Station Improvements			✓
Multiple PS - Prescott Rd - Greenwell Springs Rd			✓
Multiple PS - Burbank Drive - Siegen Lane			✓
Pump Station 42		✓	
Pump Station 42 Forcemain - Phase I		✓	
Pump Station 42 Forcemain - Phase II		✓	
Central Consolidated Pump Stations		✓	

TABLE 2			
Updated EPA Consent Decree RMAP Milestones for Category 2 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Central Consolidated Forcemains		✓	
<p>*Note that the column and corresponding check-marks highlighted in yellow depict those projects whose milestone schedules will be completed outside of the current January 1, 2015 100% milestone.</p> <p>**Those projects that are highlighted in blue are those that the City/Parish is proposing to add to the Consent Decree, above and beyond what is required, The City/Parish is including compliance deadlines for each project as well.</p>			

Category 3: Wastewater Treatment and Storage

This category of projects includes wet weather improvements at the City/Parish wastewater treatment plants (WWTP's), as well as storage facilities throughout the service area. In addition, this category of projects now includes several additional projects not required by the Consent Decree that will greatly improve the operation and maintenance of the wastewater collection system, WWTP's, and storage facilities. The Wastewater Treatment Projects that are part of this updated RMAP2 submittal are summarized below:

- Immediate Action Plan (IAP) South WWTP Project that includes screening, trickling filter recirculation pumping, primary treatment improvements, and bio-solids thickening improvements.
- Phase 1 Improvements at the South WWTP for Wet Weather Flow including influent pumping, screening and grit removal for a predicted flow of 345 MGD. Phase 1 also includes 64 million gallons of equalization storage at the South WWTP.
- Phase 2 Improvements at the South WWTP include wet weather flow treatment with a peak capacity of 200 MGD (as previously approved in the November 2006 RMAP2).
- North WWTP Odor Control Project is designed to minimize odors from the North WWTP.
- North WWTP Master Plan Project includes various upgrades to the North WWTP identified in the Wastewater Master Plan, such as SCADA, back-up power, miscellaneous structural, mechanical, and operation and maintenance needs.

In addition, there are two storage projects included in this category that are sized to reduce peak flows to existing North WWTP which are listed below and depicted as well in Table 3. These storage projects are part of the transmission system which permits storage of wet weather peak flows.

- Choctaw Storage Facility
- Hooper Storage Facility

Finally, the Supervisory Control and Data Acquisition (SCADA) project and Standby Power Program should help to greatly improve the overall operation of the treatment facilities and pump stations, while minimizing risks associated with SSOs.

Table 3			
Updated EPA Consent Decree RMAP Milestones for Category 3 Projects			
	33% Construction Milestone	66% Construction Milestone	100% Construction Milestone
Milestone Date	4 th QTR 2012	4 th QTR 2014	4 th QTR 2017
Construction Status	Construction Functionally Complete	Construction Functionally Complete	Construction Functionally Complete
Project Descriptions RMAP2 Projects			
Choctaw Storage and Pump Station Facility		✓	
Hooper Storage Facility		✓	
South WWTP IAP (Consolidated – Screening, Primary Treatment, Trickling Filter Recirculation, Sludge Handling)	✓		
South WWTP IAP (Effluent Pumping Improvements)	✓		
SWWTP Wet Weather Improvements -Phase I		✓	
SWWTP Wet Weather Improvements - Phase II (PDP portion)		✓	
SWWTP Wet Weather Improvements – Phase II (Master Plan portion)			✓
NWWTP Odor Control Project	✓		
NWWTP Master Plan Projects			✓
Sewer System and WWTP Stand-by Power Program			✓
SCADA (Collection System, Operations Data and Control Center)			✓
Choctaw Sewer Collection Maintenance Facility			✓
<p>*Note that the column and corresponding check-marks highlighted in yellow depict those projects whose milestone schedules will be completed outside of the current January 1, 2015 100% milestone.</p> <p>**Those projects that are highlighted in blue are those that the City/Parish is proposing to add to the Consent Decree, above and beyond what is required, The City/Parish is including compliance deadlines for each project as well.</p>			

Attachment 2
Voluntary RMAP2 Scope Addition

Attachment 2 – Voluntary RMAP2 Scope Addition

DATE: June 1, 2011

Since 2007, the overall original program costs have escalated by approximately 10+% from the original planning estimates to over \$1.3 billion dollars. This does not include the escalation from the original \$500 million RMAP plan done in 2001.

The City/Parish is not only absorbing these cost increases, but has voluntarily added a number of significant projects to the Second Remedial Measures Action Plan (RMAP2) program that will greatly help improve operation and maintenance and reduce sewer overflows even more dramatically. These projects include emergency generators at the 400+ pumping stations; and the installation of a state of the art SCADA real time control system to allow the City/Parish to manage wet weather flows to maximize in system storage and treatment to reduce overflows. Other projects that the City/Parish is implementing or proposing to implement in addition to the Consent Decree required projects include South WWTP Phase 2 Master Plan Project, North WWTP Master Plan Projects, the North Odor Control Project, the Choctaw Sewer Collection Maintenance Facility Project, and the Comite Foster Road Phase 2 Project. These additional projects are estimated to cost over \$106.6 million dollars and were not included in the \$1.3 billion total. General descriptions of these projects are below.

- **Stand-by Power Program** - This project will drastically reduce SSOs caused by power outages at the 400+ pump stations in the system, by providing stand-by power at the pump stations. This program consists of installing generators at every wastewater pump station and wastewater treatment facility throughout the City/Parish that can be put in place during power outages, eliminating the risk of overflows from this cause.
 - **Status:** Generator purchasing began in 2010, and generator installation began in 2011. Program will continue for the duration of SSO Program.
- **SCADA Project** - The SCADA Project will provide telemetry and remote monitoring to all existing pump stations, new pump stations, and those pump stations being replaced. The project provides remote monitoring of operations data & alarms that will be communicated via telemetry to a centralized operations center. The centralized operations center will have control capability for major pump stations and storage facilities in the system, allowing flow control to anticipate and reduce the possibility of overflows and/or reduce their severity. The remote monitoring will help City/Parish staff quickly respond to mechanical and electrical problems at the pump stations.
 - **Status:** SCADA project is currently under design and will advertise for construction in 3rd quarter 2011. Project will continue for the duration of SSO Program.

- **South Wastewater Treatment Plant Phase 2 Master Plan Project** – This project includes Master Plan improvements were outlined in the *Draft Wastewater Master Plan (CH2M HILL, May 2008)*. The following are project elements that will be included as additive alternates for the South WWTP Phase 2 construction project:
 - Secondary electrical source consisting of on-site engine/generators
 - Improvements to the existing solids thickening and dewatering facilities including new thickened sludge mixing tanks
 - Repair and improvements to existing anaerobic digesters including a new sludge heating system utilizing digester gas and hot water boilers
 - Rehabilitation of existing buildings
 - Construction of a plant SCADA system
 - Construction of new laboratory and administration buildings
 - **Status:** Project is nearly completed with design. The project is expected to advertise for construction in 3rd quarter 2011, and construction is currently expected to be completed by the end of 2014

- **North Wastewater Treatment Plant Master Plan Projects** – Based on the *Draft Wastewater Master Plan (CH2M HILL, 2008)* and recent plant inspections, the following items were identified to be addressed at the North WWTP:
 - New raw sewage pumping station
 - New preliminary treatment
 - Comprehensive odor control
 - Plant SCADA system
 - Replace gaseous chlorine with sodium hypochlorite
 - General plant rehabilitation (electrical, mechanical, structural)
 - Standby electrical generators
 - Sludge digestion rehabilitation with gas utilization
 - **Status:** Project has not yet begun. If the extension is granted, project will begin immediately. If the extension is not granted, project will begin design in 2014 and begin construction in 2015 at the earliest.

- **North Wastewater Treatment Plant Odor Control Project** - the North WWTP Odor Control Project is designed to minimize odors from the WWTP headworks building.
 - **Status:** Project is complete.

- **Choctaw Sewer Collection Maintenance Facility** – The Choctaw Administration/Maintenance Facility will consolidate several separate City/Parish facilities to one location. The facility will house the wastewater collections staff, provide warehouse and equipment storage, house the electrical and pump maintenance shops, and include a fueling station for use by City/Parish employees. The site is centrally located in the parish, so the maintenance facility will allow staff to be efficiently deployed to all areas of DPW's sewer network. The pump maintenance shop will include a pump testing pit, which allows the City/Parish to test pumps at the shop rather than testing once installed at the pump station.

- **Status:** Project is currently under design. This project will begin construction in 2014.
- **Comite Drive – Foster Road Phase 2 Project** - This project includes an upgrade to the existing sewer system that runs along Comite Drive. The current sewer system in this area is individual septic systems that discharge into an open ditch along the road. A new sewer collection system is being installed to eliminate these discharges. The project consists of new sewers, forcemains, and pump stations.
 - **Status:** Project is complete.

The City/Parish plans to continually evaluate and improve their sewer collection system and wastewater treatment facilities even after RMAP2 completion. During the RMAP2 engineering and planning process, the City/Parish also was proactively planning for future flows/loads and future regulatory requirements through the year 2032 through the development of the *Draft Wastewater Master Plan*. The *Draft Wastewater Master Plan* includes projects that are needed to handle future flows in the wastewater collection/transmission system and future loads at the WWTPs, in addition to those projects needed to deal with the deteriorating condition of the collection system and WWTPs. Even though the wastewater master planning effort was not a requirement of the Consent Decree, some elements of the *Draft Wastewater Master Plan* have been incorporated into the RMAP2 submittal where practical, and when it met the criteria initially established for the RMAP2 projects during planning. The *Draft Wastewater Master Plan* identified some additional projects for implementation beyond those described in the paragraphs above and those implemented already in the RMAP2 projects, located throughout the wastewater collection system at pump stations and at the South WWTP, that are currently planned to begin following RMAP2 completion. Many of these projects are significant in scope and cost, though they are projects that do not directly improve NPDES permit compliance and reduce SSOs (requirements of the Consent Decree). It was therefore decided that these projects would have a delayed start and will begin once the RMAP2 projects are completed. The estimated cost for these additional master plan projects is approximately \$62.2 million dollars, and at this time are planned to be funded for implementation once RMAP2 project are completed

In addition to these projects described above that are funded, there is a project that isn't currently funded, but the City/Parish is committed to do in the future as a part of its vision for Baton Rouge. The project is the *Water and Wastewater Center of Excellence*. It is intended to be a continuing education center for those involved with operations, maintenance, and management of drinking water and wastewater treatment systems. In addition this facility would provide various water and wastewater operator training and certification programs. It is the intent of the City/Parish that a facility of this nature would help create and retain a skilled workforce and provide future growth and employment opportunities for those working in the environmental resource community.

Attachment 3
Program Status/Case Memo

Attachment 3 – Program Status/Case Memo

This attachment discusses the City/Parish's progress made through the last quarter (March 31, 2011) with Consent Decree implementation, in addition to highlighting key elements of the 3 year extension request. As previously mentioned, the 3 year extension request to the Consent Decree compliance schedule would extend the overall program completion date to January 1, 2018. In order for the proper engineering and management of the projects to occur, the extension needs to be granted soon, not at the end of the program. The RMAP2 "bubble" of projects will be occurring over the next few years. Construction activities will ramp up even more and need to be leveled out systematically and soon. It is the intent of the City/Parish that this document and the other attachments included in with the extension request letter be used to for a prompt evaluation and approval of the request.

Overall Consent Decree Implementation Status

To date, the City/Parish has made significant progress on its Consent Decree requirements and has been extremely prompt and responsive with Consent Decree deliverables. A general status of the progress made on Consent Decree implementation is below.

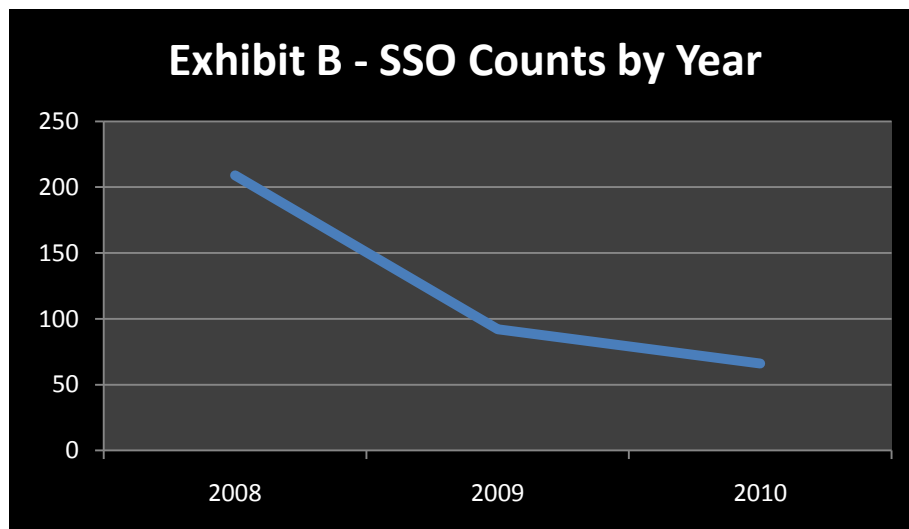
- As of March 31, 2011, the City of Baton Rouge and East Baton Rouge Parish have submitted 49 consent decree administrative deliverables to USEPA and DOJ ahead of or on schedule including: Quarterly EPA Reports, Annual EPA Reports, Collection System and Treatment Plant Preventive Maintenance Plans, Treatment Facility Assessment Report, RMAP2 report, etc.
- The City- Parish has also completed all 5 supplemental environmental projects (SEPs) on or before the milestone dates established in the Consent Decree. These SEPs were a series of environmentally beneficial projects to the community.
- 13 of 14 RMAP 1 projects (projects identified by past tunnel plan that were common to alternatives being evaluated at the time with the EPA in the Consent Decree) completed ahead of, or on schedule even though tunnel plan is obsolete. The Industriplex Project was delayed due to unavoidable utility conflicts, difficult easement acquisitions, alignment changes, and permitting and other utility coordination issues which could not be overcome by reasonable actions by the City/Parish and its construction contractor. At this time, this project is functionally completed and in operation. The City/Parish has asserted that this project is not susceptible to stipulated penalties due to the circumstances of the delay beyond the control of the City/Parish. An RMAP 1 completion report was also included with the 36th Quarterly EPA Report delivered to USEPA in April 27, 2011.
- RMAP2 projects (the capital improvement plan projects approved by DOJ/EPA/LDEQ in April 2009 based on modeling and engineering that was completed by the Program Management Consultants, based on comprehensive sewer rehabilitation instead of deep tunnels). RMAP2 program status as of March 31, 2010 is below:
 - 8 projects completed ahead of schedule
 - 27 projects under construction

- 37 projects in design
- The City-Parish has exceeded required wastewater treatment and collection system preventive maintenance goals including annual sewer cleaning, CCTV, manhole inspections, visual inspection of FM, air release valve inspections, pumping system inspections, and storage facility site visits.
- The City/Parish is spending much more money than the required \$3 million annually on infiltration and inflow reduction activities for sewer repairs, sewer rehabilitation, and other capital expenditures related to reducing I/I in the North, South, and Central WWTP collection systems.
- The City/Parish is implementing an aggressive Outreach and Public Awareness Program consisting of the following:
 - Program web site
 - Monthly progress reports (500 sent monthly)
 - 50 neighborhood and civic group meetings
 - Council member information sessions
 - Construction impact program (flyers, door hangers, hot line for questions)
 - Regular meetings with Metro Council to keep them fully informed

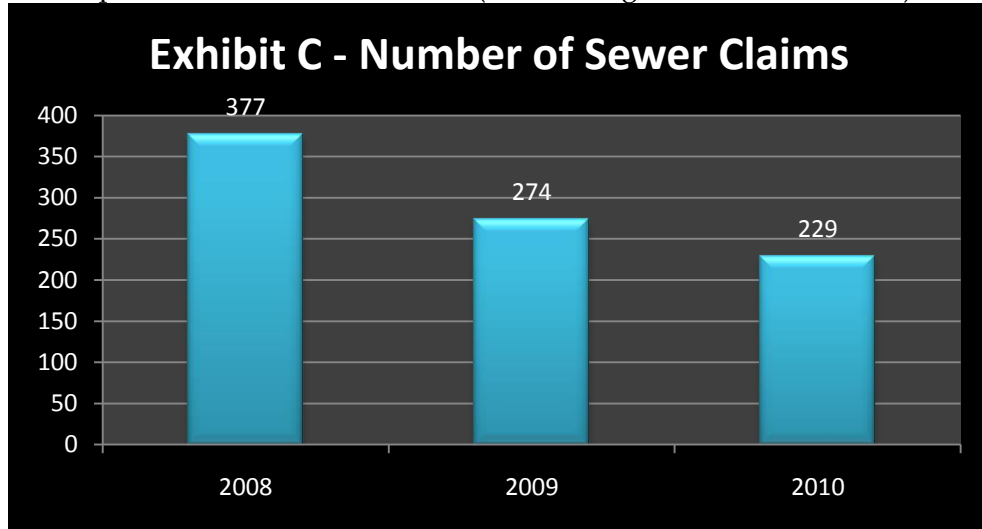
Key Elements of the Extension Request:

- The City/Parish requested an extension in 2006 after the Hurricanes Katrina- and Rita-related delays were experienced. EPA/DOJ agreed to consider the extension request at a later date when program progress could be better evaluated (noted in an EPA letter dated July 2007 and from February 2008 conference call minutes with DOJ/EPA). Additionally, since that time there have been hurricanes (Gustav and Ike) in 2008 and the recent Gulf of Mexico oil spill in 2010, and the threat of Mississippi River Flood in May 2011 that has disrupted the normal business operations of the City/Parish, diverted staff from their normal work, affected contractor availability and prices, affected the engineering consultant availability and prices, affected availability and prices of equipment supplies, and even has changed the population of the City/Parish. Many of these extreme events occurred during the critical initial planning portion of program, and the City/Parish is now working under a very compressed schedule (less than 6 years from Consent Decree Amendment approval in April 2009 to RMAP2 completion in January 1, 2015). See Attachment 5 - LDEQ Emergency and Administrative Orders for more details.
- Without the 3 year extension, the City/Parish will have over 60+ projects under construction simultaneously in 2012. Almost all of these projects involve the public right-of-way and are potentially disruptive to those who live and work in the City/Parish (1 - Detours and inconvenience to commerce and residents; 2 - Mud, dust, and noise associated with construction). More than 350+ separate contracts for these projects will have to be channeled through the already stressed City/Parish Purchasing Department system. See the Construction Peak Map in Exhibit A for more details.

- Rate increases beyond what is already programmed would stress an already economically disadvantaged community and would put a **High Burden** on ratepayers. See Attachment 4 – Baton Rouge Affordability Analysis for more details.
- The overall program costs have escalated by approximately 10+% from the original planning estimates to \$1.3 billion. The City/Parish is not only absorbing these cost increases, but has voluntarily added a number of significant projects to the program that will help improve operation and maintenance and reduce sewer overflows even more dramatically. These projects include emergency generators at the 400+ pumping stations and the installation of a state of the art SCADA real time control system to allow the City/Parish to maximize in system storage and treatment to reduce overflows. Other projects that the City/Parish is implementing or proposing to implement in addition to the Consent Decree-required projects include the South WWTP Phase 2 Project – Master Plan portion, the North WWTP Master Plan Projects, the North Odor Control Project, the Choctaw Sewer Collection Maintenance Facility Project, and the Comite Foster Road Phase 2 Project. These additional projects are estimated to cost over \$104.6 million dollars and were not included in the \$1.3 billion total. See Attachment 2 – Voluntary RMAP2 Scope Addition for more details.
- The capacity of some necessary local support functions has been exceeded, especially related to servitude and right-of-way acquisition for the projects. Land acquisition is the critical path of the program. The City/Parish has been forced to start some projects without the needed right-of-way or servitudes, causing disruption to contractors and project schedules. The capacity of necessary local appraisers to do the required appraisals has also been exceeded, which has resulted in significant land acquisition delays. This support service cannot be performed by non- local appraisers unfamiliar with Baton Rouge property values.
- The City/Parish has dramatically reduced its number and volume of SSO's from implementation of I/I reduction activities, and implementation of the RMAP2 sewer rehabilitation and capacity improvement projects. *SSO volume was reduced from 2.8 MG in 2008 to 119,000 gallons in 2010 (reduced by 95%). Since 2008 the number of SSOs counted has been reduced by 68%.*

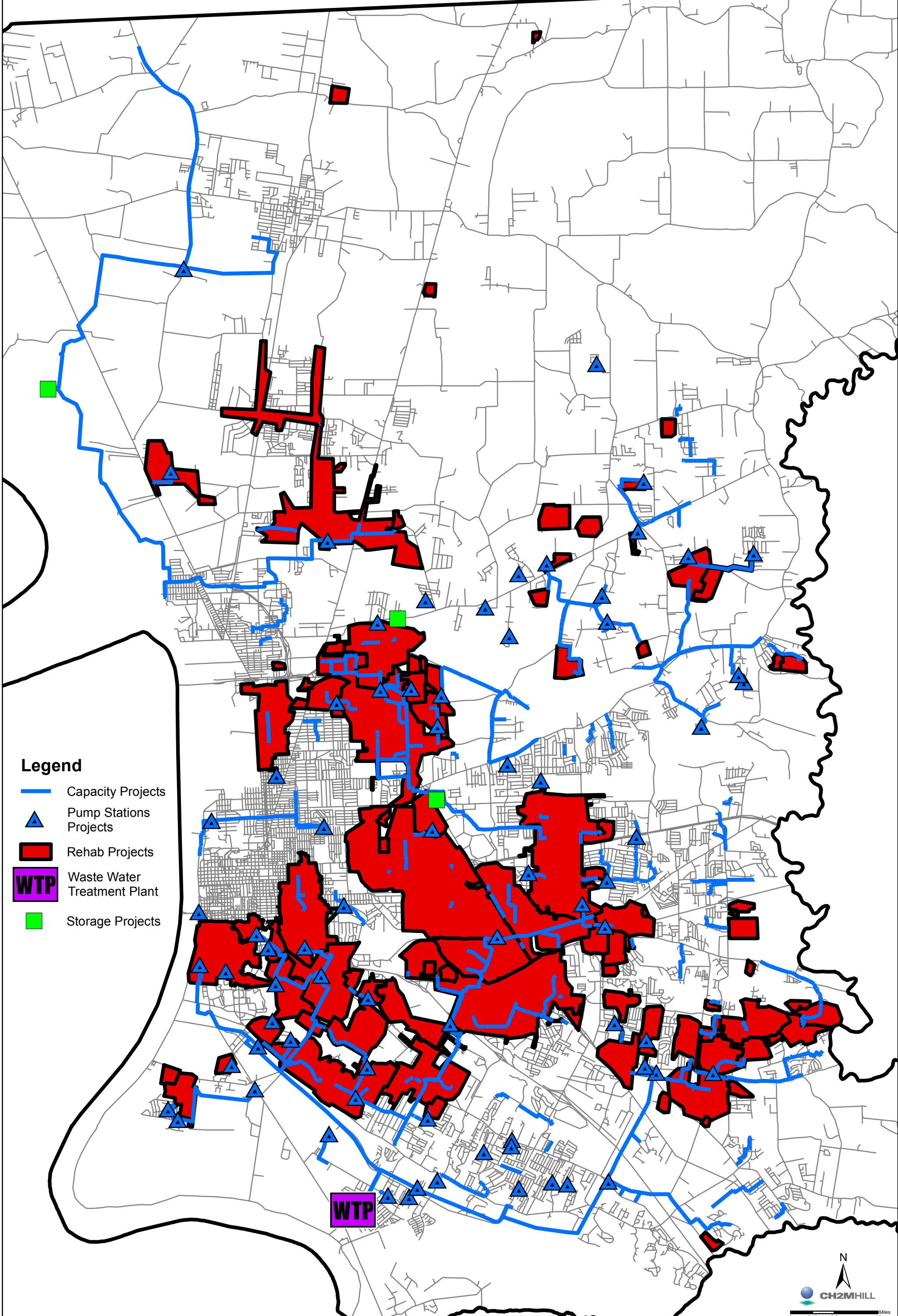


- Since 2008 the number of sewer claims is down 39% and the amount of sewer claims paid since 2008 is down 22% (data through December 31, 2010).








- Permit acquisitions and state approvals have begun to slow down, since the City/Parish cannot force utilities/railroads/state agencies to rush permit approvals and the agencies have been inundated with requests.
- Contractor bonding limitations are being realized as more projects are bid for construction in a short period of time. Local contractors are having trouble bidding on projects due to their bonding limitations, which will reduce the pool of bidders as more projects are bid for construction.
- Limited qualified labor pools are being stretched thin as more projects are bid for construction. The limited qualified labor pools can lead to quality and performance issues during construction, which could potentially cost the City/Parish additional money in the long run.

Exhibit A
Baton Rouge SSO Control and Wastewater Facilities Program
Construction Peak (2012 - Existing EPA Compliance Schedule)



Legend

-  Capacity Projects
-  Pump Stations Projects
-  Rehab Projects
-  Waste Water Treatment Plant
-  Storage Projects

Attachment 4
Baton Rouge Affordability Analysis



East Baton Rouge Sewerage Commission

Department of Public Works

Mark J. LeBlanc, MPA, CPA

Assistant DPW Director

EPA Affordability Analysis For the East Baton Rouge Sewerage Commission June 1, 2011

The East Baton Rouge Sewerage Commission (EBROSCO) is under a consent decree with the United States Environmental Protection Agency (EPA) and the Louisiana Department of Environmental Quality (LDEQ) to reduce sanitary sewer overflows (SSOs) in its service area and to meet National Pollution Discharge Elimination System (NPDES) permit requirements at the wastewater treatment plants. Work under the modified consent decree, as approved by EPA and LDEQ on April 22, 2009 is progressing, but EBROSCO is facing tight timelines with respect to right-of-way acquisition, utility relocations, and completion of the construction program by January 1, 2015. There are also increasing financial pressures on funding the \$1.4 billion (originally \$0.5 billion) program through its completion date.

The Affordability Analysis completed, using EPA criteria, shows that for all ratepayers in Baton Rouge, Louisiana a **Medium Burden** exists. But over 40 percent of Baton Rouge residents are below the median household income, a very high percentage compared to other cities. When the impacts on these residents are considered a **High Burden** exists.

With these issues in mind, EBROSCO management is requesting a three (3) year time extension to the consent decree to better manage and meet construction timelines, add additional work to the program (such as projects at the North Treatment Plant, etc.) and avoid additional financial pressure on the system's rate payers, especially low income households.

Detailed calculations and documentation are provided herein.

Financing the SSO Control and Wastewater Facilities Capital Improvements Program (RMAP2):

In order to finance this massive capital improvements program, a sufficient revenue base must exist in order to pay for the program. EBROSCO is financing SSO CIP 2 (RMAP2) through a combination of debt issuances and some pay-as-you go financing. EBROSCO has two permanent sources of revenue: the sewer user fee and a one-half of one percent (1/2%) sewer sales and use tax.

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Sewer User Fee:

The sewer user fee was adopted by EBROSCO on May 15, 1985 and has been amended three times to increase the base rates and volume rate charges to current and future levels. The sewer user fee provides about two-thirds of the revenue base for the sewer program. **Table 1** presents a brief history of the sewer user fee and its changes as well as current rates, based on the neighborhood average of 8,600 gallons of usage. For 2011, estimated revenues from the sewer user fee are expected to total approximately \$72 million.

Table 1

Sewer User Fee History

Ordinance <u>Date</u>	Ordinance <u>Number</u>	Action <u>Action</u>	Effective <u>Date</u>	Approved <u>Rate Increase</u>	8,600 <u>Gallon Usage</u>
05/15/1985	7853	Enacted	07/01/1985	N/A	\$ 8.01
05/26/1987	8417	Increase	07/01/1987	66%	\$ 13.30
08/25/1999	11542	Increase ⁽¹⁾	01/01/2000	32%	\$ 17.55
			01/01/2001	32%	\$ 21.82
			01/01/2002	31%	\$ 25.94
06/12/2002	12334	Increase	01/01/2003	10%	\$ 28.54
			01/01/2004	4%	\$ 29.67
			01/01/2005	4%	\$ 30.85
			01/01/2006	4%	\$ 32.09
			01/01/2007	4%	\$ 33.36
			01/01/2008	4%	\$ 34.70
			01/01/2009	4%	\$ 36.09
			01/01/2010	4%	\$ 37.54
			01/01/2011	4%	\$ 39.04
		Awaiting Effective Date	01/01/2012	4%	\$ 40.60
		Awaiting Effective Date	01/01/2013	4%	\$ 42.23
		Awaiting Effective Date	01/01/2014	4%	\$ 43.92
		Awaiting Effective Date	01/01/2015	4%	\$ 45.67
		Awaiting Effective Date	01/01/2016	4%	\$ 47.50
		Awaiting Effective Date	01/01/2017	4%	\$ 49.40

Sewer Sales Tax:

In April of 1988, the citizens of East Baton Rouge Parish passed a one-half of one percent (1/2%) sales and use tax dedicated for sewer improvements. The tax went into

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effect on January 1, 1989. The sales tax can be for used operations and maintenance, security for debt issuances, and for any lawful sewer improvement. The sewer sales tax was the main financing element for financing the first sewer consent decree construction program. From 1989-2005, sales tax bonds were issued to finance the first consent decree program and the beginning of the SSO CIP 2(RMAP2).

In 2006, the Parish of East Baton Rouge transferred the avails of the sewer sales tax, through an intergovernmental agreement, to EBROSO in order for the tax to be combined with the sewer user fee for debt issuance purposes. Prior to the transfer, debt issuances were secured separately by the sewer sales tax and the sewer user fee. The combination of the two revenue streams provides a more stable covenant for the issuance of sewer revenue/sales tax bonds. Both fees are still accounted for separately as required by local ordinances.

Table 2 presents sales tax revenue collections for the period 1989-2010. The table shows that the sales tax has had healthy growth over the course of its existence, but it is subject to fluctuations in the economy as evidenced by the negative growth that occurred in 2009 and 2010. When this occurs it places more stress on sewer user fee rate payers because their share of the financing burden is proportionately higher.

<u>Year</u>	<u>Sales Tax Collections</u>	<u>Percent Change</u>
1989	\$ 17,434,982	N/A
1990	\$ 18,804,835	7.86%
1991	\$ 18,963,595	0.84%
1992	\$ 20,173,421	6.38%
1993	\$ 20,931,149	3.76%
1994	\$ 22,380,537	6.92%
1995	\$ 23,663,303	5.73%
1996	\$ 25,234,100	6.64%
1997	\$ 26,196,289	3.81%
1998	\$ 28,055,025	7.10%
1999	\$ 28,682,210	2.24%
2000	\$ 28,955,580	0.95%
2001	\$ 28,612,909	-1.18%
2002	\$ 29,493,488	3.08%
2003	\$ 30,258,456	2.59%
2004	\$ 30,636,066	1.25%

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Table 2
Sales and Use Tax Collections

<u>Year</u>	<u>Sales Tax Collections</u>	<u>Percent Change</u>
2005	\$ 35,971,547	17.42%
2006	\$ 39,373,365	9.46%
2007	\$ 39,774,063	1.02%
2008	\$ 41,653,496	4.73%
2009	\$ 38,564,115	-7.42%
2010	\$ 37,573,486	-2.57%

Average annual growth rate without the Katrina years of 2005 and 2006 is 2.83%.

Program Affordability Analysis:

As stated above, EBROSCO management will request a three year extension to the consent decree to complete the revised SSO CIP 2 (RMAP2) construction program. One of the major factors used by EPA to determine whether an extension should be granted in capital improvement programs is whether the program is affordable to rate payers in the service area. EPA provides a policy and guidance document for preparing an “affordability” analysis for sewer systems. This analysis will discuss the details of the two major financial indicators, as defined by EPA guidelines, the Residential Indicator and the composite Financial Capability Indicator.

Summary of Findings:

Table 3, as presented below, shows that EBROSCO has a **Medium Burden**, financially, as indicated by the intersection of its Residential Indicator of 1.60% and its composite Financial Capability Indicator of 2.33%. These indicators were developed by EPA through a guidance document and will be discussed below in greater detail. A Medium Burden would indicate that EBROSCO’s current rate payers are under some financial stress with respect to paying for the \$1.4 billion SSO CIP 2 (RMAP2)

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Table 3

EBROSCO Financial Capability Assessment: A Medium Financial Burden with High Burden for Low Income Household Rate Payers

Residential Indicator (Cost Per Household as a % of MHI1)			
Permittee Financial	Low	Medium	High
Capability Indicators Score	(Below 1.0%)	(Between 1.0 and 2.0%)	(Above 2.0%)
Weak: (Below 1.5)	Medium Burden	High Burden	High Burden
Mid-Range:			
(Between 1.5 and 2.5)	Low Burden	<u>Medium Burden</u>	<u>High Burden</u>
Strong: (Above 2.5)	Low Burden	Low Burden	Medium Burden

Note: EBROSCO has a Residential Indicator score of 1.60% and Financial Capability Indicators that average of 2.33%.

The intersection of these two indicators determines the financial burden category.

¹ *MHI = Median Household Income*

Table 3 also shows that low income EBROSCO rate payers have a High Burden, financially, as indicated by the intersection of its Residential Indicator of 2.12% and its composite Financial Capability Indicator of 2.33%. This hybrid calculation was made utilizing the base of actual rate payers (126,228 as of 12/31/2010) as opposed to just utilizing the number of households. The rate payer base should mirror household demographics in East Baton Rouge Parish. Of the Parish’s 167,360 households in 2009, approximately 41% fall below the Medium Household Income (MHI) of \$44,215 with 31% of the 41% having incomes below \$25,000.

EPA Affordability Assessment:

Residential customer affordability is often based on wastewater bills as a proportion of median household income. However, for evaluation of issues related to SSO implementation, EPA uses a more comprehensive method to evaluate affordability of SSO CIP 2 (RMAP2). EPA also takes into consideration a set of regional financial capability indicators to measure a utility’s financial capability. This analysis reviews the future cost increases in terms of the affordability indicators used in EPA’s *Combined Sewer Overflows-Guidance for Financial Capability Assessment and Schedule Development* (EPA 1997) hereafter referred to as “*Guidance*.”

EBROSCO has a plan in effect to fund its SSO CIP 2 (RMAP2) and this analysis will focus on how affordable it is for its rate payers. As indicated in **Table 3**, EBROSCO rate payers are under financial stress with respect to having to fund the program by its 2015 deadline. A consent decree extension would provide financial relief by not having to

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increase rates above the present plan of increasing rates by 4% per year as called for in the present sewer user fee ordinance.

The *Guidance* uses the following financial indicators listed in its SSO Policy:

- Total annual wastewater and SSO control costs per household as a percent of Median Household Income (MHI)
- Bond ratings
- Overall net debt as a percent of full market property value (debt burden)¹
- Unemployment rate
- Median Household Income
- Property tax collection rate¹
- Property tax revenues as a percent of full market property value¹

The *Guidance* states that these financial indicators “might not present the most complete picture of a permittee’s financial capability to fund SSO controls. Permittees are encouraged to submit any additional documentation that would create a more accurate and complete picture of their financial capability.” For EBROSCO, 2005 and 2006 changed the customer base significantly. At the end of 2004, EBROSCO had 127,864 customers in its base. After Hurricane Katrina in 2005, the customer base increased to 130,564 and by the end of 2006 it was 133,113. This represented a 4% increase from the 2004 end of year levels. EBROSCO has never had this large of a change in its customer base since it was created in 1985. Many of the people displaced by Katrina from the New Orleans area were also economically disadvantaged and had low incomes. Many of these people have permanently relocated to East Baton Rouge Parish and are part of the 41% of the Parish that have MHIs of less than \$44,215 which is based on 2009 data from the U.S. Census Bureau. These changes in customer demographics have and will continue to impact EBROSCO’s financial structure throughout the remainder of the consent decree construction program.

The second goal of the *Guidance* is to assist the permittee, EPA, and state environmental authorities in cooperatively developing SSO control implementation schedules. It does not recommend specific time schedules for implementation of SSO controls, based on a certain set of financial capability indicators, but it does provide general boundaries to aid all parties in negotiating reasonable and effective schedules for the implementation of SSO controls.

This analysis is presented within a mid-program schedule review by EBROSCO and its program manager, CH2M HILL. The program schedule is being analyzed from both a financial and constructability point of view. Improvements and modifications to the North Wastewater Treatment Plant are also being analyzed by EBROSCO staff and

¹ EBROSCO is a sewer authority and does not have the authority to levy a property tax. Financial indicators are based on EBROSCO’s sewer user fee rate base and the one-half percent sewer sales and use tax.

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CH2M HILL in order to determine what modifications will provide environmental relief to customers who live in the vicinity of this plant.

The *Guidance* also states that “when the permittee is a sanitary district, sewer authority, or similar entity, the second phase indicators related to property values and property tax revenues may not be applicable. In those circumstances, the permittee may simply use the remaining indicators or submit other related documentation that will help assess the financial capability to implement the SSO controls.”² Because EBROSCO is a sewer authority and does have the legal authority to levy a property tax, those financial indicators will not be used in this assessment.

Affordability Assessment Methods:

Affordability assessment using current EPA methodology involves two different levels of analysis, the Residential Indicator, and Financial Capability Indicators.

Residential Indicator:

The first level measures household affordability or ability-to-pay and is called the Residential Indicator. The most prevalent household cost measure is annual user charges (AUC) as a percentage of median household income (MHI). EPA defines AUC as total current costs (O&M and Debt Service) plus future estimated costs (O&M and Debt Service) for the implementation of an SSO capital improvements program. The formula is defined below:

$$\frac{\text{Total AUC}}{\text{Annual MHI}} = X \text{ percent}$$

Where:

X = a household affordability ratio used to determine the Residential Indicator

The methodology specifies a threshold determined to be affordable. Variations on this formula can be found, such as; 1) inclusion of water and wastewater charges in the numerator; 2) use of average (mean) household income in the denominator; and 3) weighting of the measures to capture poverty effects. These variations have not been calculated in this memorandum.

Table 4, as presented below shows household income data used in the development of the Residential Indicator score for EBROSCO. The MHI for East Baton Rouge Parish is 12.65% below the National MHI. This would yield a score of 2 for the Parish and EBROSCO on the EPA scale.

² *Combined Sewer Overflows-Guidance for Financial Capability Assessment and Schedule Development*, U.S. Environmental Protection Agency, February 1997, page 20.

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Table 4

U.S. and East Baton Rouge Parish, Louisiana Median Household Incomes (MHI)

National Adjusted 2010 MHI ¹	\$	50,618
East Baton Rouge Parish Adjusted MHI 2010 ²	\$	44,215
East Baton Rouge Parish MHI Relative to National MHI		-12.65%

Indicator Ranking	Indicator Ranking	Score
More than 25% below National Adjusted MHI	Weak	1
+/- 25% of Adjusted National MHI	Mid-range	2
More than 25% above National Adjusted MHI	Strong	3

¹ The U.S Census Bureau's 2007-2009 Data Set for the nation and all fifty states was used for national MHI

² The U.S Census Bureau's 2005-2009 Data Set for East Baton Rouge Parish, Louisiana was used for MHI

Financial Capability Indicators:

The second phase of the assessment involves the calculation of a composite Financial Capability Indicator which assesses the overall financial health of the sewer utility as it operates within a community. This indicator examines a utility's bond rating, unemployment rate in the area, median household income, and other factors to develop a numerical score. As stated above, the factors of debt burden (net debt as a percentage of full market value), property tax revenue collection, and property tax revenues as a percentage of full market value were not used for EBROSCO.

Results:

Residential Indicator:

Table 5, below, summarizes the results for the Residential Indicator score for EBROSCO. As defined in the guidelines, EBROSCO received a Residential Indicator score of 1.6% for the calculation of Annual Cost per Household divided by Median Household Income. This is in the **Medium Burden** range, as defined by EPA. *This is the standard definition of the Residential Indicator in the EPA guidelines.*

The use of the standard Residential Indicator can be misleading when examining a sewer utility. For EBROSCO, the number of residential customer accounts (126,228 as of

EPA Affordability Analysis

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12/31/2010) does not equate to the number of households (167,360) in East Baton Rouge Parish, as estimated by the Census Bureau. The difference of 41,000 can be attributable to households that are not connected to the sewer system and individual apartments and other residential developments that are counted as households by the Census Bureau, but as one residential account by EBROSCO because their respective complexes are served by only one water meter. The complex owners receive the water and wastewater service bills. There are exceptions to this such as condominium type complexes where each residence has its own water meter and thus its own wastewater service account, but this is more of an exception than is typically the case.

Using this assumption, if the numerator were changed for the Residential Indicator calculation to use Cost per Residential Account and the denominator remains the Median Household Income then the ratio jumps to 2.12% which would place the Residential Indicator burden on EBROSCO customers in the **High Burden** range. This indicates a higher impact on the customers who directly pay the sewer user fee as opposed to those areas of the Parish that do not have sewer services and do not pay the fee or those whose services may or may not be hidden in monthly rental payments.

For EBROSCO, the demographic composition of the customer base has changed as indicated above. Approximately 41% of the households in the Parish have incomes that are below the MHI of \$44,215 for the Parish. This demographic directly impacts the customer base for EBROSCO because these demographics easily translate from households to rate paying customers. It is therefore not unrealistic to say that EBROSCO customers are experiencing a high financial burden with respect to paying for the consent decree construction program.

Table 5

Residential Cost Indicators for EBROSCO

Projections Using Annualized Costs with Inflation Adjustment for O&M

Line #	Cost Category		WW Residential Indicator Calculation
1	Current EBROSCO Costs:		
2	Annual O&M Expense	2011	\$ 45,568,000
3	Annual Debt Service (P&I)	2011	<u>\$ 47,009,900</u>
4	Subtotal-Current Costs		\$ 92,577,900
5	Projected Costs: 2012-2052		
6	Estimated Additional Annualized O&M Expense: 2012-2052 ¹	EBROSCO	\$ 45,768,300
		Model	

EPA Affordability Analysis

June 1, 2011

7	Additional Annualized Debt Service (P&I) 2012-2052 ²	EBROSCO Model	\$ 23,866,500
8	Subtotal-2012-2052 Annualized Costs		<u>\$ 69,634,800</u>
9	Current & Projected Costs		<u>\$ 162,212,700</u>
10	Residential Share of Total Costs ³	72.90%	\$ 118,249,600
11	Total Number of Households ⁴		\$ 167,360
12	Cost Per Household (Line 10/Line 11)		<u>\$ 706.56</u>
13	Annual Cost Per MHI - EPA Guidance Standard (Line 12/Line 18)		1.60%
14	High Burden Impact Calculation:		-
15	Total Number of Residential Customer Accounts ⁵		126,228
16	Cost Per Residential Customer Account (Line 10/Line 15)		<u>\$ 936.79</u>
17	Annual Cost Per MHI for Residential Customer Accounts (Line 16/Line 18)		2.12%
18	MHI East Baton Rouge Parish, Louisiana <i>(Over 41% of households are below the MHI in EBR Parish⁴)</i>		\$ 44,215
Criteria:			
	Low	< 1.0% of MHI	
	Mid-Range	1.0-2.0% of MHI	
	High	> 2.0% of MHI	
¹ Present Value of Estimated Annual O&M Expenses discounted at 4% through 2052.			
² Additional Annualized Debt Service through 2052 to finance the SSO Capital Improvements Program.			
³ Based on Average Residential Billed Volumes.			
⁴ 2005-2009 U.S. Census Bureau Data Set (5 year estimates) East Baton Rouge Parish, Louisiana			
⁵ Per Service Fee Business Office, December 2010.			

Table 5 was compiled and calculated, based on the criteria in the EPA *Guidance* document. A summary of the components of the calculation is as follows:

- Lines 1-3: Current EBROSCO costs include annual O&M expenses and annual debt service for the 2011 fiscal year.
- Lines 5-8: Projected Costs include the following:
 - The present value of *Estimated Additional O&M Expenses* for the period 2012-2052 discounted at a 4% growth rate. This covers the expected useful life of the assets that will be placed into service and the final year (2052) that debt service will be paid on these assets.

EPA Affordability Analysis

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- The Additional Annualized Debt Service is the difference between current Annual Debt Service and the estimated Maximum Debt Service which is scheduled to occur in 2024.
- Line 9: The Current and Projected Costs are the sum of the Current Annual Costs and the Projected Annualized Costs, as described above. The total costs are projected to be \$162,212,700.
- Line 10: The Residential Share of Total Costs was calculated based on the number of residential customers and non-residential customers as of December 31, 2010. The calculation was made in the following manner:
 - As of December 31, 2010, 92.5% of the customer base was residential while 7.5% was non-residential.³
 - The Service Fee Business Office calculates the “neighborhood average” usage for the sewer system at 8,600 gallons of billed volume per month. In order to mitigate the effect that some customers may in fact use less water than the “neighborhood average,” the usage rate was dropped to 7,850 gallons (10.5 Ccf) per month or 94,200 gallons per year.
 - The number of residential customers, 126,228, at December 31, 2010 was multiplied by 94,200 gallons of billed volume per year to yield a residential usage of 11,890,677,600 gallons for 2010.
 - The total billed volume was 16,311,420,000 gallons for 2010.
 - The non-residential billed volume was determined by subtracting billed residential volume, 11,890,677,600 gallons, for 2010 from total billed volume, 16,311,420,000 gallons, yielding a non-residential billed volume in the amount of 4,420,742,400 gallons for 2010.
 - Using this methodology, the proration for residential billed volumes and non-residential billed volumes was 72.9% and 27.10%, respectively as of December 31, 2010.
 - Multiplying the residential share of billed volume of 72.9% by the Current and Projected Costs yields a residential share of \$118,249,600.
- Lines 11-12: The Cost per Household is determined by dividing the Residential Share of Total Costs (\$118,249,600) by the number of households (167,360) in the Parish and yields \$706.56 per year.
- Line 13: The Annual Cost per MHI is 1.60% which places the Residential Indicator in the Medium Burden (Between 1.0 and 2.0%) Range.

High Burden Impact Calculation:

- Lines 15-16: The Cost per Residential Account is determined by dividing the Residential Share of Total Costs (\$118,249,600) by the number of residential accounts (126,228) and yields \$936.79 per year. *This is not an EPA standard*, but is important because it indicates that a burden exists on those who actually pay the sewer user fee.

³ Source: Finance Department-Service Fee Business Office, December 2010.

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- Line 17: The Annual Cost per Median Household Income (MHI) Per Residential Customer is 2.12% which places the Residential Indicator in the High Burden (Above 2.0%) Range.

Composite Financial Capability Indicator:

Table 6, below, presents EBROSCO's composite Financial Capability Indicator and the scores for those variables as defined by the EPA's *Guidance* document.

Table 6

EBROSCO Financial Capability Indicator Benchmarks & Scoring Summary

Indicator	Strong	Mid-Range	Weak	Value	Score
Bond Rating	AAA-A (S&P), Aaa-A (Moody's), or AAA-A (Fitch)	BBb (S&P), (Moody's), or BBB (Fitch)	Baa BB-D (S&P), Ba-C (Moody's), or BB- D		
EBROSCO	AA/Aa2/AA-			AA	3
Overall Net Debt as a Percent of Full Market Property Value	Below 2%	2%-5%	Above 5%		
EBROSCO1	N/A	N/A	N/A	N/A	N/A
Unemployment Rate	More than 1 percentage point below the National Average	+/-1 percentage point of the National Average	More than 1 percentage point above the National Average		
East Baton Rouge Parish, Louisiana ²		7.9%		7.9%	2
Median Household Income	More than 25% above Adjusted National MHI	+/-25% Adjusted National MHI	of More than 25% below Adjusted National MHI		
East Baton Rouge Parish, Louisiana ³		-12.65%		-12.65%	2
Property Tax Revenues as a % of Full Market Value	Below 2%	2%-4%	Above 4%		
EBROSCO1	N/A	N/A	N/A	N/A	N/A

EPA Affordability Analysis

June 1, 2011

Table 6

EBROSCO Financial Capability Indicator Benchmarks & Scoring Summary

Indicator	Strong	Mid-Range	Weak	Value	Score
Property Tax Collection Rate	Above 98%	94%-98%	Below 94%		
EBROSCO1	N/A	N/A	N/A	N/A	N/A
				Sum of Scores	7
				Average Score	2.33
Rankings					
Weak	1				
Mid-Range	2				
Strong	3				

¹ Not Applicable to EBROSCO since it is a sewer authority with no property tax levy.

² East Baton Rouge Parish, Louisiana (August 2010-January 2011 average) Bureau of Labor Statistics)

³ The U.S Census Bureau's 2005-2009 Data Set for East Baton Rouge Parish, Louisiana

The findings of **Table 6** can be summarized as follows:

- EBROSCO has a strong bond rating with a “AA” rating from Standard & Poor’s; a “Aa2” rating from Moody’s; and a “AA-” rating from Fitch. These ratings were promulgated by the rating agencies for EBROSCO’s 2010 Sewer Revenue/Sales Tax Bond Issue. This places EBROSCO in the “Strong Benchmark” category and a ranking score of “3.”
- The unemployment rate for East Baton Rouge Parish, Louisiana averaged 7.9% for the period August 2010-January 2011 as published by the Bureau of Labor Statistics. The National Unemployment Rate is 8.8% placing the Parish 0.9% below the National Average. This places the Parish in the “Mid-Range Benchmark” category and a ranking score of “2.”
- The Median Household Income for East Baton Rouge Parish is \$44,215 which places the Parish 12.65% below the National Median Household Income of \$50,618. This places the Parish in the “Mid-Range Benchmark” category and a ranking score of “2.”
- The sum of the scores yielded a “7” and the average score was “2.33” which places EBROSCO in the “Mid-Range” ranking for its Financial Capability Indicator.

Summary:

EBROSCO has a **Medium Burden**, financially, as displayed in **Table 3**, utilizing the traditional EPA Affordability Analysis as set forth in EPA's *Guidance*. This indicates that rate payers are under some financial stress with respect to financing the SSO Capital Improvements Program. Utilizing the High Burden Impact Calculation, EBROSCO rate payers have a **High Burden** with respect to financing the consent decree program by January 1, 2015. Since the rate payer base for EBROSCO is responsible for providing approximately two-thirds of the financial resources for the sewerage system, there is currently a high burden for rate payers, especially those who have incomes below the MHI of \$44,215 for East Baton Rouge Parish. Approximately 41% of the households in the Parish are below this MHI threshold.

As disclosed in EPA's *Guidance* document, there is a case to be made that a consent decree extension would help relieve some of this financial stress and would aid in completing the construction timelines in a more orderly and efficient manner. Though the *Guidance* does not imply that an "automatic extension" would be granted due to a Medium Burden or High Burden finding, it does state that it could be used as a negotiating point in determining what a fair schedule would be.

The *Guidance* document also states that permittees should also include any other documentation that would aid in making its case for a schedule change or other modification. EBROSCO will include a copy of its sewer financial rate model with all other information that it presents in order to show how tight its bond capacity is because of the large amount of projects that have to be financed in such a short period of time. The model, along with this affordability analysis, will aid EBROSCO management in making its case for an extension of time to complete the SSO CIP 2 (RMAP2) program.

Appendix A

Project Background:

EBROSCO has been under a consent decree with the EPA since 1988. Consent Decree 1 required the City-Parish, through EBROSCO, to eliminate subdivision oxidation ponds and package treatment plants and transport those flows to expanded treatment plants (North, Central, and South) for both primary and secondary treatment before discharge into the Mississippi River. The ultimate purpose of this program was to eliminate sewage effluent from entering into smaller receiving streams such as the Amite and Comite Rivers. The cost of Consent Decree 1 was approximately \$400 million.

In January 1998, EBROSCO was informed, by EPA, that it was in violation of its National Pollutant Discharge Elimination System (NPDES) permit due sanitary sewer overflows that were occurring in the system during wet weather events. EBROSCO took the position that it wanted to cooperate with both EPA and LDEQ in developing an SSO plan that would reduce these overflows during wet weather conditions.

SSO Capital Improvements Plan 1 (Original Alternate 7):

There were several iterations to SSO Capital Improvements Plan 1 (SSOCIP 1) and it was derived from three separate alternatives, Numbers 3, 4, and 7 referenced in the 2001 Consent Decree between EBROSCO, EPA, and LDEQ. Alternates 3 and 4 were very similar and called for some collection system rehabilitation, capacity improvements (transmission and pumping), ballasted flocculation units (BFUs), and the construction of above ground tanks to equalize and store wet weather flows until they could be released and transported to the treatment plants for treatment. Alternate 7 was similar in scope except that it provided for the construction of deep tunnels in the Central and South Treatment Plant Service Areas to store wet weather flows and to provide future capacity for the system. One of the positive points for this alternative was that approximately 60-80 pumping stations were envisioned to be eliminated which would reduce operation and maintenance costs over the life of the project.

EBROSCO, with the assistance of the U.S. Army Corps of Engineers, conducted a value engineering analysis for all three SSO alternatives. The result of this analysis concluded that Alternate 7 had the lowest overall economic costs of the three alternatives. As a result of this analysis, EBROSCO staff recommended Alternative 7 to the East Baton Rouge Sewerage Commission (Metropolitan Council) in 2001 and it was listed as one of the three alternatives that could be used in the consent decree. Alternates 3, 4, and 7 had projects that were common to each other. These projects were referred to as Remedial Measures Action Plan 1 (RMAP 1) in the consent decree. The common projects included limited rehabilitation, capacity projects (transmission and pumping) and the Choctaw Storage Facility.

EBROSCO staff, with the assistance of MWH Americas, Inc., developed a planning level cost estimate for the SSOCIP 1 program. **Table 7** indicates that the preliminary cost estimate was \$678 million and shows the various elements of the program.

Table 7	
Alternate 7 Cost Elements	
Cost	
<u>(\$ Millions)</u>	<u>Description</u>
\$ 535	Tunnel System (40 miles) and 40 Capacity Upgrade Projects (300 miles of new or replaced pipe and 112 modified or new pump stations)
\$ 65	Ballasted Flocculation Systems at the Wastewater Treatment Plants
\$ 48	12 Rehabilitation Projects (primarily in the North Treatment Plant Service Area)

EPA Affordability Analysis

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\$ 30	4 Storage Facilities
-------	----------------------

\$ 678

RMAP 1 projects began in 2001 with rehabilitation projects in the North Treatment Plant Service Area. These areas were identified as having high infiltration and inflow problems and projects were put together to address these issues. Design engineering contracts were let for capacity improvement projects that were required to accommodate wet weather flows for a two year twelve hour (2 yr – 12 hr) design storm that was selected as appropriate for Baton Rouge.

The design process for Remedial Measures Action Plan 2 (RMAP 2) projects which included the Central and South Trunk Tunnels and their associated pump stations began in late 2003 and early 2004. As preliminary design data became available, it became evident that program costs and constructability, especially for the tunnels, was becoming an issue.

Another issue that affected program costs was the use of Ballasted Flocculation Units (BFUs) as part of SSOCIP 1. The EPA, through numerous meetings and communications with EBROSCO personnel, began to question the use of Ballasted Flocculation Units (BFUs) as part of the plan. BFUs utilize a high speed physical-chemical treatment process. EBROSCO's plan was to use this process during wet weather events. The BFU's would treat the wet weather flows and blend those flows with effluent being discharged from the primary and secondary treatment process at the treatment plants. The EPA regarded this "blending process" as bypassing treatment because all the influent coming into the treatment plants would not be subject to primary and secondary treatment, and disinfection.

As a result of these communications with EPA, EBROSCO began the process of how to mitigate the additional costs that would be incurred by having to subject both dry weather and wet weather flows to primary and secondary treatment. These additional costs would include the need for storage at the treatment plants and in the field. This process was in its infancy when Mayor Kip Holden came into office in January 2005.

In early 2005, the Mayor instructed his Interim Public Works Director, William Daniel, to evaluate the plan. Mr. Daniel, along with MWH, convened a forum of nationally recognized wastewater engineers from across the country to discuss the existing program and potential modifications. The forum generally concluded that:

- The tunneling program in Alternate 7, based on experience in other states, was extremely risky from a cost standpoint.
- Technological improvements and patent expirations had significantly lowered the cost of comprehensive rehabilitation.

EPA Affordability Analysis

June 1, 2011

- EPA was likely to require comprehensive rehabilitation at the conclusion of the Alternate 7 tunneling program.

As a result of the forum, EBROSCO, with council approval, commissioned Camp, Dresser & McKee, Inc. (CDM) to conduct a formal ninety day reassessment of the consent decree program.

The ninety day reassessment by CDM concluded that the tunnel program should be abandoned in favor of comprehensive rehabilitation to reduce infiltration and inflow (I/I) into the system and wet weather capacity improvements related to pumping and treatment. CDM worked with EBROSCO staff to prepare a modified plan for submittal to EPA for their approval.

SSO Capital Improvements Plan 2 (RMAP 2):

In 2006, CH2M HILL was selected by the City-Parish Engineers-Surveyor Selection Board and approved by the Metropolitan Council to be the program manager for the revised and current consent decree program that was submitted to EPA in September 2008 (approved by EPA in April 2009). Using this modified consent decree plan, CH2M HILL developed a comprehensive program to implement the design and construction of this program, commonly referred to as the Revised Remedial Measures Action Plan (RMAP) 2 Construction Program. CH2M HILL's program consists of the following program segments as presented in **Table 8** below. The *cost estimates in Table 2 are as of May 2011*.

Table 8	
CH2M HILL	
Revised RMAP2 Program - Approved by EPA/DOJ/LDEQ April 2009	
Cost	
<u>(\$ Millions)</u>	<u>Description</u>
\$ 257	Comprehensive Rehabilitation
\$ 622	Capacity Improvements Projects
\$ 336	Wet Weather Treatment & Storage
\$ 121	Master Planning Projects (PS Generators, Telemetry, Treatment Plants)
\$ 1,336	

Cost Comparison:

In order to make an accurate cost comparison between the original Alternate 7 Program and the current RMAP2 program that CH2M HILL is administering, it is necessary to update the 2004 cost base for the original program to a more current time reference.

EPA Affordability Analysis

June 1, 2011

The most significant comparison factors were construction cost impacts that were associated with Hurricane Katrina, rising fuel costs, and concrete cost. These cost increases came into play irrespective of the program alternative and are reflected in our current program estimates. The 2004 planning level estimates were assumed to represent the true cost of the original program. An important point that must be considered is that the 2004 planning level estimates did not factor in the cost impact of deleting the ballasted flocculation process from the original program. Both of those assumptions would affect the final ultimate cost of Alternate 7.

Public Works Deputy Director Bryan Harmon calculated a cost factor adjustment of 1.6 that (15% inflation to 2008, 20% Engineering News Record Construction Cost Index Adjustment, and approximately 20% for the indirect cost less the engineering fees that were already considered.) was needed to adjust the original program level estimates in order to make a useful comparison between the two programs. In **Table 9** below, Mr. Harmon's 1.6 cost adjustment factor is utilized to adjust the cost of the original program to one that is more representative of what the minimum cost of the Alternate 7 Program may have been.

Table 9

Alternate 7 Cost Elements

Adjusted for Inflation and other Costs

Cost Adjustment ⁽¹⁾		
Original Cost	Factor (1.6)	
(\$ Millions)	(\$ Millions)	Description
\$ 535	\$ 860	Tunnel System (40 miles) and 40 Capacity Upgrade Projects (300 miles of new or replaced pipe and 112 modified or new pump stations)
\$ 65	\$ 100	Ballasted Flocculation Systems at the Wastewater Treatment Plants
\$ 48	\$ 80	12 Rehabilitation Projects (primarily in the North Treatment Plants Service Area)
\$ 30	\$ 50	4 Storage Facilities
\$ 678	\$ 1,090	

(1) Cost Factor Adjustment as calculated by Bryan Harmon in June 2010.

Table 10 below presents a side-by-side comparison of the original Alternate 7 Program, adjusted for inflation and other variables (Table 9), and the current RMAP2 Program (Table 8) that we are undertaking, under the modified consent decree (approved by the EPA in April 2009). The most important point that needs to be made about Table 10 is

EPA Affordability Analysis

June 1, 2011

that the original Alternate 7 Program only provided for **12 rehabilitation** projects. EBROSCO is now aware that in order to reduce sanitary sewer overflows in the collection system, an additional \$250 million (based on current program costs) of rehabilitation would have been needed in the Alternate 7 Program because the system was in such disrepair. Very little rehabilitation (10%-12% of the collection system) was planned under the tunnel program because it was envisioned that the tunnels would capture and hold the excess infiltration/inflow (I/I) until it could be pumped out of the tunnels and treated at the plants using the BFU's and the primary and secondary treatment process. But with the BFU's ruled out by EPA and the fact that our collection system was going to have to be rehabilitated to reduce I/I, the cost differential to get to the 60% to 70% rehabilitation threshold, under the Revised RMAP2 Program, is about \$250 million for the original Alternate 7 Program.

Table 10

Comparison of Alternate 7 to the Revised RMAP2 Program ⁽¹⁾

Adjusted for Inflation and other Costs

<u>Description</u>	<u>Column 1</u>	<u>Column 2</u>	
	Alternate 7	Revised	Difference
	Adjusted Cost	RMAP2 Program	Column 2 less
	Table 3	Table 2	Column 1
	<u>(\$ Millions)</u>	<u>(\$ Millions)</u>	<u>(\$ Millions)</u>
Tunnel System	\$ 860	\$ -	\$ (860)
Ballasted Flocculation Systems	\$ 100	\$ -	\$ (100)
Rehabilitation	\$ 80	\$ -	\$ (80)
Wet Weather/Storage Facilities	\$ 50	\$ 336	\$ 286
Master Plan	\$ -	\$ 121	\$ 121
Capacity Improvements	\$ -	\$ 622	\$ 622
Comprehensive Rehabilitation	\$ -	\$ 257	\$ 257
<i>Sub-Totals from Tables 3 & 2</i>	\$ 1,090	\$ 1,336	\$ 246
Additional Comprehensive			
Rehabilitation for Alternate 7	\$ 250	\$ -	\$ (250)
<i>Grand Total</i>	\$ 1,340	\$ 1,336	\$ (4)

⁽¹⁾ *These costs do not include costs for program or construction administration.*

EPA Affordability Analysis

June 1, 2011

As **Table 10** indicates, there is a small cost differential between the current program and the adjusted Alternate 7 Program, but it must be emphasized that the Alternate 7 Program was never fully designed, so a true cost can only be estimated, based on the best available information. Many of the engineers who studied Alternate 7 believed that constructing deep tunnels at depths of ninety feet or more would have been difficult in the soil strata of East Baton Rouge Parish. No tunneling projects have been done in the type of soils in the Baton Rouge area. The nature of our local soils could have brought forth unforeseen problems that would have added to the tunnel program's cost. Furthermore, there were only one or two companies with the technology to construct the tunnels. These potential unforeseen costs, as well as the rehabilitation costs, were never factored into the cost of Alternate 7. The current RMAP2 Program utilizes proven technology for all aspects of the program and the soil depths that construction will take place in is well known.

Attachment 5

**LDEQ Declaration of Emergency and Administrative
Orders**

Attachment 5 – LDEQ Declaration of Emergency Administrative Orders

DATE: June 7, 2011

The City of Baton Rouge and Parish of East Baton Rouge (City/Parish) is requesting a three (3) year extension to the compliance schedule at this time. The City/Parish asserts that the numerous unforeseen force majeure events that have occurred and affected the Baton Rouge area since 2005 are a justification that extension is warranted, especially given the tremendous resources and effort the City/Parish has expended in preparation for and response to these events, as well as committing time and resources to the recovery phases of the force majeure events. The City/Parish has made great progress implementing the RMAP1 and RMAP2 projects required by the Consent Decree, even though they have had to deal with these disastrous events.

Since 2005, there have been numerous catastrophic force majeure events to affect the City/Parish staff and residents. These events at times have disrupted the normal business operations of the City/Parish, diverted staff from their normal work, affected contractor availability and prices, affected the engineering consultant availability and prices, affected availability and prices of equipment supplies, and even has changed the population of the City/Parish.

The Louisiana Department of Environmental Quality (LDEQ) has put out numerous Declarations of Emergency and Administrative Orders for these events, many of which have been even extended and are current for 2011. The City/Parish has documented these force majeure issues as the execution of the RMAP2 Program has progressed. The City/Parish acknowledges that they may not have made formal force majeure declarations for all of these events, but asserts that these were indeed force majeure events and intends to help demonstrate that by the attached copies of the actual emergency orders issued by LDEQ. This section includes a list of the first and last documented LDEQ Orders made for the force majeure events below, in addition to the timing of the start and stops of the orders is also listed below:

- Hurricane Katrina August 30, 2005 – March 31, 2011
- Hurricane Rita September 27, 2005 – September 30, 2007
- Hurricane Gustav August 31, 2008 – March 31, 2011
- Hurricane Ike September 12, 2008 – March 1, 2011
- British Petroleum Deep Water Horizon Oil Spill May 5, 2010 – August 31, 2011
- 2011 Threat of Flooding along the Mississippi River and Other State Water Bodies May 10, 2011 – August 7, 2011

Attachment 6
July 10, 2007 EPA Letter



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200
DALLAS, TX 75202-2733

JUL 10 2007

CERTIFIED MAIL

RETURN RECEIPT REQUESTED (7099 3220 001 4433 6870)

Honorable Melvin "Kip" Holden, Mayor-President
City of Baton Rouge
Parish of East Baton Rouge
Post Office Box 1471
Baton Rouge, Louisiana 70821

Re: United States and Louisiana v. The City of Baton Rouge and Parish of East Baton Rouge, Civil Action No. 01-97B-M3 (M.D. La.)

Dear Mayor-President Holden:

As you are aware, a Consent Decree was entered in the above referenced civil action by the United States District Court for the Middle District of Louisiana on March 14, 2002 ("the 2002 Consent Decree"). On November 19, 2002, pursuant to Paragraph 31 of the 2002 Consent Decree, the City of Baton Rouge and the Parish of East Baton Rouge ("the City/Parish") submitted to the United States Environmental Protection Agency, Region 6 ("EPA") and the Louisiana Department of Environmental Quality ("LDEQ"), for review, a proposed Second Remedial Measures Action Plan ("the 2002 Second RMAP proposal") in which it selected a remedial measure for the Collection System. Before EPA and LDEQ issued a decision on the 2002 Second RMAP proposal, the City/Parish proposed to revise the submittal. Discussions between the Parties resulted in agreement that the City/Parish would submit to EPA and LDEQ, for review, under Section XVII (Review of Submittals) of the 2002 Consent Decree, a revised Second RMAP proposal which would supersede the 2002 Second RMAP proposal.

The City/Parish commissioned Camp Dresser & McKee Inc, to conduct a formal reassessment of the compliance plan outlined in the 2002 Consent Decree. On August 1, 2005, the City/Parish submitted to EPA and LDEQ a revised Second RMAP proposal titled *Draft Sewer System Model Verification and Revised Second Remedial Action Plan* ("the 2005 Revised Second RMAP proposal") together with a cover letter, dated July 29, 2005. With regard to the 2005 Revised Second RMAP proposal, the City/Parish stated that "the modification proposed herein will achieve the purposes of the Consent Decree in a more permanent, reliable, and less risky manner than the [2002] Second RMAP [proposal]". (July 29, 2005 Letter at page 1)

In July 2006, counsel for the City/Parish confirmed that the 2005 Revised Second RMAP proposal was current and should be considered by EPA and LDEQ for approval. As such, EPA and LDEQ were positioned to make conditional approval of the 2005 Revised Second RMAP proposal, which would have superseded the 2002 Second RMAP proposal. In September 2006, the City/Parish informed EPA and LDEQ that a Peer Review had been conducted, in January 2006, by the new consultant, CH2M Hill. As a result of the Peer Review, the City/Parish was moved to request approval of several new modifications to the Second RMAP proposal, including abandonment of the previous

compliance proposal to convert the Trickling Filter process of the South Wastewater Treatment Plant (WWTP) to an Activated Sludge process, as so described in the 2005 Revised Second RMAP proposal. The City was then directed to provide a written request which outlines the specifics of the new modifications requested of the Second RMAP proposal, for the review and consideration of EPA and LDEQ.

The City/Parish submitted a Report to EPA and LDEQ, dated November 21, 2006, and titled *Sewer System Model Verification and Revised Second Remedial Action Plan* ("the 2006 Revised Second RMAP proposal") together with a cover letter, dated December 13, 2006. EPA and LDEQ have reviewed and considered the 2006 proposal and understand that the 2006 Revised Second RMAP proposal supersedes all other Proposed Second RMAPS.

Pursuant to Paragraph 40(a) of the 2002 Consent Decree, EPA and LDEQ hereby approve the 2006 Revised Second RMAP proposal as the Second RMAP proposal.

In the December 13, 2006 cover letter, the City/Parish states, "[i]n addition to the interim limits for the South WWTP already contained in the current Consent Decree, we are hereby requesting additional interim limits" (See December 13, 2006 letter at paragraph 6). The Parties have discussed this issue and agreed to address the issue of new interim limits for the South WWTP in a proposed Agreement and Order Regarding Modification of the Consent Decree. Thus, the City/Parish's request for new interim limits for the South WWTP is not approved by this letter.

In various discussions between the Parties, the City/Parish requested that some flexibility be added to the 2002 Consent Decree to allow EPA and LDEQ to grant extra time to complete the Second RMAP in an effort to compensate for potential delays caused by the aftereffects of the 2005 Hurricanes Katrina and Rita. The Parties have discussed this issue and agreed to address the issue of the aftereffects of the 2005 Hurricane season in a proposed Agreement and Order Regarding Modification of the Consent Decree. Thus, the City/Parish's request for extra time to complete the Second RMAP to compensate for potential delays caused by the aftereffects of the 2005 Hurricane season is not approved by this letter.

EPA and LDEQ thank the City/Parish for its time and effort in the development and submission of the 2005 and 2006 Revised Second RMAP proposals. If you should have any questions, then please feel free to contact Mona Tates of EPA at (214) 665-7152 or Peggy Hatch of LDEQ at (225) 219-3715.

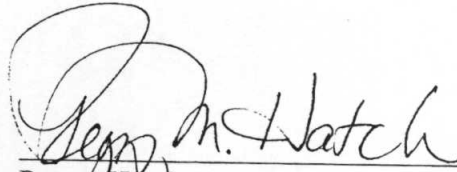
Sincerely,

7/10/07
Date

Mona M Tates
Mona M. Tates
Louisiana State Program Coordinator
Water Enforcement Branch (6EN-WM)
Compliance Assurance and Enforcement Division

7/10/07

Date



Peggy Hatch
Administrator

Enforcement Division

Louisiana Department of Environmental Quality

Cc: Michael T. Donnellan
U.S. Department of Justice

Attachment C
Municipal Water Pollution Prevention (MWPP)
Environmental Audit Reports – South, North, and
Central Wastewater Treatment Plants



Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, Louisiana
70821

November 7, 2011

Department of Environmental Quality
Office of Environmental Compliance
Permits Compliance Unit
Post Office Box 4312
Baton Rouge, Louisiana 70821-4312

Re: Municipal Water Pollution Prevention (MWPP) Environmental Audit Reports

LPDES PERMIT NUMBERS:

LA0036439 AI# 4843
LA0036421 AI# 4842
LA0036412 AI# 4841

COPY

Dear Sirs:

As required by your office, we are submitting the annual Municipal Water Pollution Prevention Environmental Audit reports along with the MWPP Resolutions. These reports represent our North, Central and South Wastewater Treatment Plants from September 1, 2010 to August 31, 2011.

If you have any questions concerning this matter, please contact Mr. Charles M. O'Brien of my staff at (225) 389-3240.

Sincerely yours,

William B. Daniel IV, PE
Public Works Director

WD/GD/pas

xc: Mary Roper, Parish Attorney
Charles M. O'Brien, Wastewater Laboratory Supervisor

Attachment(s):

LOUISIANA

MUNICIPAL WATER POLLUTION PREVENTION

MWPP



<i>Facility Name:</i>	City of Baton Rouge / Parish of East Baton Rouge / South Wastewater Treatment Plant
<i>LPDES Permit Number:</i>	LA0036412
<i>Agency Interest (AI) Number:</i>	4841
<i>Address:</i>	2850 Gardere Lane
	Baton Rouge, LA
<i>Parish:</i>	East Baton Rouge
<i>(Person Completing Form) Name:</i>	Cynthia Thomas
<i>Title:</i>	Assistant Wastewater Laboratory Supervisor
<i>Date Completed:</i>	October 24, 2011

INSTRUCTIONS

1. Complete only the sections of the Environmental Audit which apply to your wastewater treatment system. Leave sections that do not apply blank and enter a "0" for the point value.
2. Parts 1 through 7 contain questions for which points may be generated. These points are intended to communicate to the department and the governing body or owner what actions will be necessary to prevent effluent violations. Place the point totals from parts 1 through 7 on the Point Calculation page.
3. Add up the point totals.
4. Submit the Environmental Audit to the governing body or owner for review and approval.
5. The governing body must pass a resolution which contains the following items:
 - a. The resolution or letter must acknowledge the governing body or owner has reviewed the Environmental Audit.
 - b. This resolution must indicate specific actions, if any, will be taken to maintain compliance and prevent effluent violations. Proposed actions should address the parts where maximum or close to maximum points were generated in the Environmental Audit.
 - c. The resolution should provide any other information the governing body deems appropriate.

PART 1: INFLUENT FLOW/LOADINGS (all plants)

A. List the average monthly volumetric flows and BOD loadings received at your facility during the last reporting year.

Column 1 Average Monthly Flow (million gallons per day, MGD)	x	Column 2 Average Monthly BOD5 Concentration (mg/l)	x 8.34 =	Column 3 Average Monthly BOD5 Loading (pounds per day, lb/day)
33.50	x	129	x 8.34 =	36,041
31.77	x	122	x 8.34 =	32,325
33.83	x	126	x 8.34 =	35,550
34.03	x	127	x 8.34 =	36,044
39.39	x	112	x 8.34 =	36,793
36.18	x	118	x 8.34 =	35,605
41.26	x	109	x 8.34 =	37,508
36.03	x	119	x 8.34 =	35,758
31.99	x	133	x 8.34 =	35,484
36.49	x	116	x 8.34 =	35,302
40.04	x	93	x 8.34 =	31,056
37.05	x	112	x 8.34 =	34,608

BOD loading = Average Monthly Flow (in MGD) x Average Monthly BOD concentration (in mg/l) x 8.34

B. List the design flow and design BOD loading for your facility in the blanks below. If you are not aware of these design quantities, refer to your Operation and Maintenance (O&M) Manual or contact your consulting engineer.

Design Flow, MGD:	54	x 0.90 =	48.60
Design BOD, lb/day:	93,224	x 0.90 =	83,902

- C. How many months did the monthly flow (Column 1) to the wastewater treatment facility (WWTF) exceed 90% of design flow? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	0	0	0	0	5	5	5	5	5	5	5	5

Write 0 or 5 in the C point total box C Point Total

- D. How many months did the monthly flow (Column 1) to the WWTF exceed the design flow? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	5	5	10	10	15	15	15	15	15	15	15	15

Write 0, 5, 10 or 15 in the D point total box D Point Total

- E. How many months did the monthly BOD loading (Column 3) to the WWTF exceed 90% of the design loading? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	0	5	5	5	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the E point total box E Point Total

- F. How many months did the monthly BOD loading (Column 3) to the WWTF exceed the design loading? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	10	20	30	40	50	50	50	50	50	50	50	50

Write 0, 10, 20, 30, 40 or 50 in the F point total box F Point Total

- G. Add together each point total for C through F and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 1: (max = 80)

Also enter this value or 80, whichever is less, on the point calculation table on page 16.

PART 2: EFFLUENT QUALITY / PLANT PERFORMANCE

A. List the monthly average effluent BOD and TSS concentrations produced by your facility during the last reporting year.

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
SEPTEMBER	28	22
OCTOBER	29	22
NOVEMBER	29	21
DECEMBER	35	23
JANUARY	32	28
FEBRUARY	23	16
MARCH	18	18
APRIL	24	22
MAY	23	19
JUNE	22	16
JULY	19	16
AUGUST	17	15

B. List the monthly average permit limits for your facility in the blanks below.

	Permit Limit		90% of Permit Limit
BOD, mg/l	30	x 0.90 =	27
TSS, mg/l	30	x 0.90 =	27

C. Continuous Discharge to Surface Water.

- i.** How many months did the effluent BOD (Column 1) exceed 90% of the permit limits? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	0	10	20	30	40	40	40	40	40	40	40	40

Write 0, 10, 20, 30 or 40 in the i point total box i Point Total

- ii.** How many months did the effluent BOD (Column 1) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	5	5	10	10	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the ii point total box ii Point Total

- iii.** How many months did the effluent TSS (Column 2) exceed 90% of the permit limits? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	0	10	20	30	40	40	40	40	40	40	40	40

Write 0, 10, 20, 30 or 40 in the iii point total box iii Point Total

- iv.** How many months did the effluent TSS (Column 2) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	5	5	10	10	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the iv point total box iv Point Total

- v.** Add together each point total for i through iv and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 2: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

Permit #: LA0036412

D. Other Monitoring and Limitations

- i. At any time in the past year was there an exceedance of a permit limit for other pollutants such as: ammonia-nitrogen, phosphorus, pH, total residual chlorine, or fecal coliform?

√ Check one box. Yes No *If Yes, Please describe:*

Total Residual Chlorine	09/11/2010	0.52 mg/L
Fecal Coliform	09/7-13/2010	471 col./100 mL

- ii. At any time in the past year was there a "failure" of a Biomonitoring (Whole Effluent Toxicity) test of the effluent?

√ Check one box. Yes No *If Yes, Please describe:*

- iii. At any time in the past year was there an exceedance of a permit limit for a toxic substance?

√ Check one box. Yes No *If Yes, Please describe:*

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

- A. What year was the wastewater treatment facility constructed or last major expansion/improvements completed?

$$\begin{array}{rcccl}
 & & & 1998 & \\
 & & & \underline{\hspace{1cm}} & \\
 \text{Current Year} & - & \text{Answer to A} & = & \text{Age in years} \\
 \underline{2011} & & \underline{1998} & & \underline{13}
 \end{array}$$

Enter Age in Part C below.

- B. Check the type of treatment facility that is employed.

	FACTOR:
<input checked="" type="checkbox"/> Mechanical Treatment Plant (trickling filter, activated sludge, etc...) Specify Type: _____	2.5
_____ Aerated Lagoon	2.0
_____ Stabilization Pond	1.5
_____ Other Specify Type: _____	1.0

- C. Multiply the factor listed next to the type of facility your community employs by the age of your facility to determine the total point value for Part 3.

TOTAL POINT VALUE FOR PART 3 =

$$\frac{2.5}{\text{Factor}} \times \frac{13}{\text{Age}} = \boxed{32.5} \text{ (max = 50)}$$

Also enter this value or 50, whichever is less, on the point calculation table on page 16.

- D. Please attach a schematic of the treatment plant.

PART 4: OVERFLOWS AND BYPASSES

- A.
i. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain:

4 √ Check one box. 0 = 0 points 3 = 15 points
 1 = 5 points 4 = 30 points
 2 = 10 points 5 or more = 50 points

- ii. List the number of bypasses, overflows or unpermitted discharges shown in A (i) that were within the collection system and the number at the treatment plant

Collection System: 0 Treatment Plant: 4

- B.
i. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system:

51 √ Check one box. 0 = 0 points 3 = 15 points
 1 = 5 points 4 = 30 points
 2 = 10 points 5 or more = 50 points

- ii. List the number of bypasses, overflows or unpermitted discharges shown in B (i) that were within the collection system and the number at the treatment plant

Collection System: 46 Treatment Plant: 5

- C. Specify whether the bypasses came from the city/village/town sewer system or from contract or tributary communities/sanitary districts, etc...

- D. Add the point values checked for A and B and place the total in the box below.

TOTAL POINT VALUE FOR PART 4: 80 (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

- E. List the person responsible (name and title) for reporting overflows, bypasses or unpermitted discharges to State and Federal authorities:

Charles M. O'Brien, Wastewater Laboratory Supervisor

Describe the procedure for gathering, compiling and reporting:

The procedure for gathering, compiling, and reporting is specified in the permit.

PART 5: SLUDGE STORAGE AND DISPOSAL SITES**A. Sludge Storage**

How many months of sludge storage capacity does your facility have available, either on-site or off-site?

Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	<2	2	3	4-5	>6
<i>points</i>	50	30	20	10	0

Write 0, 10, 20, 30 or 40 in the A point total box A Point Total

B. For how many months does your facility have access to (and approval for) sufficient land disposal sites to provide proper land disposal?

Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	<2	6-11	12-23	24-35	>36
<i>points</i>	50	30	20	10	0

Write 0, 10, 20, 30 or 40 in the B point total box B Point Total

C. Add together the A and B point values and place the sum in the box below at the right:

TOTAL POINT VALUE FOR PART 5: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

Permit #:

LA 0036412

PART 6: NEW DEVELOPMENT

- A. Please provide the following information for the total of all sewer line extensions which were installed during the last year.

Design Population: 312
 Design Flow: 0.09 MGD
 Design BOD: 200 mg/l

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings to the sewerage system were significantly increased (5% or greater)?

√ Check one box. Yes = 15 points No = 0 points

If Yes, Please describe:

List any new pollutants:

- C. Is there any development (industrial, commercial or residential) anticipated in the next 2-3 years, such that either flow or pollutant loadings to the sewerage system could significantly increase?

√ Check one box. Yes = 15 points No = 0 points

If Yes, Please describe:

List any new pollutants you anticipate:

- D. Add together the point value checked in B and C and place the sum in the box below.

TOTAL POINT VALUE FOR PART 6: 0 (max = 30)

Also enter this value or 30, whichever is less, on the point calculation table on page 16.

PART 7: OPERATOR CERTIFICATION AND EDUCATION

- A. What was the name of the operator-in-charge for the reporting year?

Name: Hugh Taylor

- B. What is his or her certification number:

Cert. #: 10-628

- C. What level of certification is the operator-in-charge required to have to operate the wastewater treatment facility?

Level Required: Wastewater Treatment IV

- D. What is the level of certification of the operator-in-charge?

Level Certified: Wastewater Treatment IV

- E. Was the operator-in-charge of the report year certified at least at the grade level required in order to operate this plant?

√ Check one box. Yes = 0 points No = 50 pointsWrite 0 or 50 in the E point total box E Point Total

- F. Has the operator-in-charge maintained recertification requirements during the reporting year?

√ Check one box. Yes No

- G. How many hours of continuing education has the operator-in-charge completed over the last two calendar years?

√ Check one box. > 12 hours = 0 points < 12 hours = 50 pointsWrite 0 or 50 in the G point total box G Point Total

- H. Is there a written policy regarding continuing education an training for wastewater treatment plant employees?

√ Check one box. Yes NoExplain: 16 hours of continuing education in a two year period.

- I. What percentage of the continuing education expenses of the operator-in-charge were paid for:

By the permittee? 100% By the operator? 0%

- J. Add together the E and G point values and place the sum in the box below at the right.

TOTAL POINT VALUE FOR PART 7: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

PART 8: FINANCIAL STATUS

A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses?

√ Check one box. Yes No *If No, How are O&M costs financed?*

SAME AS B.

B. What financial resources do you have available to pay for your wastewater improvements and reconstruction needs?

Wastewater improvements and reconstruction needs are funded from four main revenue sources. They are one half percent sales and use tax, sewer user fees, sewer impact fees, and a \$4 million subsidy from the general fund supported from gaming revenues.

PART 9: SUBJECTIVE EVALUATION

A. Collection System Maintenance

i. Describe what sewer system maintenance work has been done in the last year.

SEE ATTACHMENT

ii. Describe what lift station work has been done in the last year.

SEE ATTACHMENT

iii. What collection system improvements does the community have under construction for the next 5 years?

SEE ATTACHMENT

B. If you have ponds please answer the following questions:

√ Check one box.

- | | | |
|---|------------------------------|-----------------------------|
| i. Do you have duckweed buildup in the ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| ii. Do you mow the dikes regularly (at least monthly), to the waters edge? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| iii. Do you have bushes or trees growing on the dikes or in the ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| iv. Do you have excess sludge buildup (> 1foot) on the bottom of any of your ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| v. Do you excersise all of your valves? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| vi. Are your control manholes in good structural shape? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| vii. Do you maintain at least 3 feet of freeboard in all of your ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| viii. Do you visit your pond system at least weekly? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

LA0036412 SOUTH PLANT

LA MWPP Environmental Audit

PART 9: Subjective Evaluation

- A1.** As part of the Consent Decree, Operation and Maintenance of the South Treatment Plant Collection Area is performed and reported on a quarterly basis. The following table is a breakdown/summary of activities performed within the South Treatment Plant Collection System Area during the reporting period.

South Treatment Area
Monitoring Period (9/10 – 8/11)

Line Cleaning	14%
CCTV Inspections	10%
Smoke Testing	3%
Dye Testing	11
Manhole Inspection	12%
Line Repaired	0%
Manhole Rehabilitation	6%
Force Main-Inspections	66%
Repaired	53%
Air Release Valves-Inspections	167%
Repaired	195%
Wet Well Cleaned	83%
Pump Stations-Repaired	18%

- A2.** As shown above, an extensive routine pump station maintenance program is in place. Additionally, the attached Capital Improvement Plan outlines the construction projects that have been completed.
- A3.** The attached Capital Improvement Plan outlines the construction projects that are currently in the planning phase, or currently under design, including estimated completion dates.

South WWTP 2010 - 2011 Annual Audit

	3rd QTR 2010	4th QTR 2010	1st QTR 2011	2nd QTR 2011	TOTAL	%
Line Cleaned	46,037	65,762	137,507	379,067	628,373	14%
CCTV Inspected	18,787	21,418	72,807	346,852	459,864	10%
Smoke Tested	127,956	12,350	4,069	4,556	148,931	3%
Dye Tested (No. of locations)	7	3	1	0	11	11
Manhole Inspected	313	128	350	1,695	2,486	12%
Line Repaired	231	234	501	481	1,447	0%
Manhole Rehabilitated	140	234	501	481	1,356	6%
Force Main – Inspected	19.4	22	8	23	72.7	66%
Repaired (no. of locations)	0	4	2	47	53	53%
Air Release Valves – Inspected	141	140	23	114	418	167%
Repaired	59	67	13	56	195	195%
Wet Wells Cleaned	68	14	78	55	215	83%
Pump Stations - Repaired	12	6	17	11	46	18%

SWWTP New Developments - Quarters 34 - 37

Subdivision / Development	# of lots	Design Pop.	Flow (gpm)	Flow (MGD)	Sewer Length (ft.)
Stumberg Villas	38	152	32	0.05	1192
The Cottages of Baton Rouge (Ben Hur Relocation and Extension)	0	0	0	0.00	660
Millerville Office Park (Sewer Extension)	0	0	0	0.00	26
Old World Villas 2nd filing	14	56	12	0.02	243
Rouzan TND-Phase 3A (Mimosa District)	26	104	22	0.03	1434
Family Dollar - Burbank (Sewer Extension)	0	0	0	0.00	120
		0	0	0.00	
		0	0	0.00	
TOTAL	78	312	65	0.09	3675

C. Treatment Plants

i. Have the influent and effluent flow meters been calibrated in the last year?

Yes No (✓ Check one box.)

SEE BELOW
Influent flow meter calibration date(s)

SEE BELOW
Effluent flow meter calibration date(s)

ii. What problems, if any, have been experienced over the last year that have threatened treatment?

iii. Is your community presently involved in formal planning for treatment facility upgrade?

✓ Check one box. Yes No *If Yes, Please describe:*

Gravity Influent
01-24-2011; 07-06-2011

Final Effluent
North Chamber 12-29-2010; 08-17-2011
South Chamber 08-17-2011

Forcemain Influent
01-24-2011; 07-06-2011

D. Preventive Maintenance

- i. Does your plant have a written plan for preventive maintenance on major equipment items?

√ Check one box. Yes No *If Yes, Please describe:*

Weekly, monthly and semi-annually preventive maintenance sheets that reflect type and frequency as specified in the O & M manuals. A new computer program will manage the maintenance and preventive maintenance of plant equipment and spare parts.

- ii. Does this preventive maintenance program depict frequency of intervals, types of lubrication and other preventive maintenance tasks necessary for each piece of equipment?

Yes No

- iii. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assured properly?

Yes No

E. Sewer Use Ordinance

- i. Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS or pH) or toxic substances to the sewer system from industries, commercial users and residences?

√ Check one box. Yes No *If Yes, Please describe:*

Sewer User Fee Ordinance (No. 7853) limits the discharge of BOD & TSS to 200 mg/l and 250 mg/l respectively. Any discharge above these limits is surcharged at a rate of 2% of the monthly sewer user fee for each limit of 10 mg/l. Pretreatment Ordinance (No. 9195) limits the discharge of heavy metals, chemical and toxic substances.

- ii. Has it been necessary to enforce?

√ Check one box. Yes No *If Yes, Please describe:*

The Sewer User Fee Ordinance is strictly enforced by the City Parish and self monitoring sampling. The same apply to the Pretreatment Ordinance. Enforcement mechanisms include discharge permits, surcharges, letter of violations, administrative orders, water termination, and fines.

- iii. Any additional comments about your treatment plant or collection system? (Attach additional sheets if necessary.)

NO

POINT CALCULATION TABLE

	Actual Values	Maximum
Part 1: <i>Influent Flow/Loadings</i>	<u>0</u>	80 points
Part 2: <i>Effluent Quality / Plant Performance</i>	<u>45</u>	100 points
Part 3: <i>Age of WWTF</i>	<u>32.5</u>	50 points
Part 4: <i>Overflows and Bypasses</i>	<u>80</u>	100 points
Part 5: <i>Ultimate Disposition of Sludge</i>	<u>10</u>	100 points
Part 6: <i>New Development</i>	<u>0</u>	30 points
Part 7: <i>Operator Certification Training</i>	<u>0</u>	100 points

TOTAL POINTS:

167.5

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

Resolved that the village/town/city of BATON ROUGE informs the Louisiana Department of Environmental Quality that the following actions were taken by CITY/PARISH METROPOLITAN COUNCIL (governing body).

1. Resolved the Municipal Water Pollution Prevention Environmental Audit Report which is attached to this resolution.
2. Set forth the following actions necessary to maintain permit requirements contained in the Louisiana Pollution Discharge Elimination System (LPDES) permit, number LA 0036412 AI#4841.

(Please be specific in listing the actions that will be taken to address the problems identified in the audit report.)

- a. CURRENTLY, WE ARE OPERATING UNDER A CONSENT DECREE WHICH BECAME EFFECTIVE MARCH 14, 2002.
- b. A PROJECT IS UNDERWAY TO REDUCE THE HIGH CONCENTRATION OF HYDROGEN SULFIDE (H₂S).
- c.
- d.
- etc..

Passed by a majority/unanimous (circle one) vote of the CITY/PARISH METROPOLITAN COUNCIL on 11-22-11 (date).



CLERK

ADOPTED
METROPOLITAN COUNCIL

NOV 22 2011

297

RESOLUTION 49011


COUNCIL ADMINISTRATOR TREASURER

REQUESTING APPROVAL FOR SUBMITTAL OF
THE LOUISIANA MUNICIPAL WATER
POLLUTION PREVENTION (MWPP)
ENVIRONMENTAL AUDIT FOR THE NORTH
WASTEWATER TREATMENT PLANT (LA
0036421 AI# 4843) TO THE DEPARTMENT
OF ENVIRONMENTAL QUALITY (DEQ) FOR
THE MONITORING PERIOD OF SEPTEMBER
1, 2010 THROUGH AUGUST 31, 2011.

BE IT RESOLVED by the Metropolitan Council of the Parish
of East Baton Rouge and City of Baton Rouge that the submittal of
the Louisiana Municipal Water Pollution Prevention (MWPP)
Environmental Audit Report for the North Wastewater Treatment Plant
(LA 00036421 AI# 4843) to the Department of Environmental Quality
(DEQ) for the monitoring period of September 1, 2010 through August
31, 2011, is hereby approved.

LOUISIANA
MUNICIPAL WATER
POLLUTION PREVENTION
MWPP



<i>Facility Name:</i>	City of Baton Rouge / Parish of East Baton Rouge / North Wastewater Treatment Plant
<i>LPDES Permit Number:</i>	LA0036439
<i>Agency Interest (AI) Number:</i>	4843
<i>Address:</i>	55 Mills Avenue
	Baton Rouge, LA
<i>Parish:</i>	East Baton Rouge
<i>(Person Completing Form) Name:</i>	Cynthia Thomas
<i>Title:</i>	Assistant Wastewater Laboratory Supervisor
<i>Date Completed:</i>	October 24, 2011

INSTRUCTIONS

1. Complete only the sections of the Environmental Audit which apply to your wastewater treatment system. Leave sections that do not apply blank and enter a "0" for the point value.
2. Parts 1 through 7 contain questions for which points may be generated. These points are intended to communicate to the department and the governing body or owner what actions will be necessary to prevent effluent violations. Place the point totals from parts 1 through 7 on the Point Calculation page.
3. Add up the point totals.
4. Submit the Environmental Audit to the governing body or owner for review and approval.
5. The governing body must pass a resolution which contains the following items:
 - a. The resolution or letter must acknowledge the governing body or owner has reviewed the Environmental Audit.
 - b. This resolution must indicate specific actions, if any, will be taken to maintain compliance and prevent effluent violations. Proposed actions should address the parts where maximum or close to maximum points were generated in the Environmental Audit.
 - c. The resolution should provide any other information the governing body deems appropriate.

PART I: INFLUENT FLOW/LOADINGS (all plants)

A. List the average monthly volumetric flows and BOD loadings received at your facility during the last reporting year.

Column 1 Average Monthly Flow (million gallons per day, MGD)		Column 2 Average Monthly BOD5 Concentration (mg/l)		Column 3 Average Monthly BOD5 Loading (pounds per day, lb/day)
12.65	x	203	x 8.34 =	21,417
11.45	x	199	x 8.34 =	19,003
14.42	x	180	x 8.34 =	21,647
13.99	x	227	x 8.34 =	26,486
18.50	x	158	x 8.34 =	24,378
16.09	x	212	x 8.34 =	28,448
18.14	x	180	x 8.34 =	27,232
11.90	x	178	x 8.34 =	17,666
19.94	x	122	x 8.34 =	20,288
14.07	x	145	x 8.34 =	17,015
14.13	x	131	x 8.34 =	15,438
12.75	x	137	x 8.34 =	14,568

BOD loading = Average Monthly Flow (in MGD) x Average Monthly BOD concentration (in mg/l) x 8.34

B. List the design flow and design BOD loading for your facility in the blanks below. If you are not aware of these design quantities, refer to your Operation and Maintenance (O&M) Manual or contact your consulting engineer.

Design Flow, MGD:

54

x 0.90 =

48.60

Design BOD, lb/day:

75,210

x 0.90 =

67,689

- C. How many months did the monthly flow (Column 1) to the wastewater treatment facility (WWTF) exceed 90% of design flow? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	0	0	0	0	5	5	5	5	5	5	5	5

Write 0 or 5 in the C point total box C Point Total

- D. How many months did the monthly flow (Column 1) to the WWTF exceed the design flow? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	5	5	10	10	15	15	15	15	15	15	15	15

Write 0, 5, 10 or 15 in the D point total box D Point Total

- E. How many months did the monthly BOD loading (Column 3) to the WWTF exceed 90% of the design loading? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	0	5	5	5	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the E point total box E Point Total

- F. How many months did the monthly BOD loading (Column 3) to the WWTF exceed the design loading? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	10	20	30	40	50	50	50	50	50	50	50	50

Write 0, 10, 20, 30, 40 or 50 in the F point total box F Point Total

- G. Add together each point total for C through F and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 1: (max = 80)

Also enter this value or 80, whichever is less, on the point calculation table on page 16.

PART 2: EFFLUENT QUALITY / PLANT PERFORMANCE

A. List the monthly average effluent BOD and TSS concentrations produced by your facility during the last reporting year.

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
SEPTEMBER	25	18
OCTOBER	29	25
NOVEMBER	30	26
DECEMBER	54	30
JANUARY	24	20
FEBRUARY	36	21
MARCH	32	28
APRIL	32	30
MAY	27	24
JUNE	29	20
JULY	17	14
AUGUST	15	13

B. List the monthly average permit limits for your facility in the blanks below.

	Permit Limit		90% of Permit Limit
BOD, mg/l	30	x 0.90 =	27
TSS, mg/l	30	x 0.90 =	27

C. Continuous Discharge to Surface Water.

- i. How many months did the effluent BOD (Column 1) exceed 90% of the permit limits? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	0	10	20	30	40	40	40	40	40	40	40	40

Write 0, 10, 20, 30 or 40 in the i point total box i Point Total

- ii. How many months did the effluent BOD (Column 1) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	5	5	10	10	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the ii point total box ii Point Total

- iii. How many months did the effluent TSS (Column 2) exceed 90% of the permit limits? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	0	10	20	30	40	40	40	40	40	40	40	40

Write 0, 10, 20, 30 or 40 in the iii point total box iii Point Total

- iv. How many months did the effluent TSS (Column 2) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	5	5	10	10	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the iv point total box iv Point Total

- v. Add together each point total for i through iv and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 2: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

D. Other Monitoring and Limitations

- i. At any time in the past year was there an exceedance of a permit limit for other pollutants such as: ammonia-nitrogen, phosphorus, pH, total residual chlorine, or fecal coliform?

√ Check one box. Yes No *If Yes, Please describe:*

- ii. At any time in the past year was there a "failure" of a Biomonitoring (Whole Effluent Toxicity) test of the effluent?

√ Check one box. Yes No *If Yes, Please describe:*

- iii. At any time in the past year was there an exceedance of a permit limit for a toxic substance?

√ Check one box. Yes No *If Yes, Please describe:*

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

A. What year was the wastewater treatment facility constructed or last major expansion/improvements completed?

$$\begin{array}{rcl}
 & & \underline{1998} \\
 \text{Current Year} & - & \text{Answer to A} = \text{Age in years} \\
 \underline{2011} & & \underline{1998} \qquad \underline{13}
 \end{array}$$

Enter Age in Part C below.

B. Check the type of treatment facility that is employed.

		FACTOR:
<input checked="" type="checkbox"/>	Mechanical Treatment Plant (trickling filter activated sludge, etc...) Specify Type: _____	(2.5)
_____	Aerated Lagoon	2.0
_____	Stabilization Pond	1.5
_____	Other Specify Type: _____	1.0

C. Multiply the factor listed next to the type of facility your community employs by the age of your facility to determine the total point value for Part 3.

TOTAL POINT VALUE FOR PART 3 =

$$\frac{2.5}{\text{Factor}} \times \frac{13}{\text{Age}} = \boxed{32.5} \text{ (max = 50)}$$

Also enter this value or 50, whichever is less, on the point calculation table on page 16.

D. Please attach a schematic of the treatment plant.

PART 4: OVERFLOWS AND BYPASSES

A.

- i. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain:

0 ✓ Check one box. 0 = 0 points 3 = 15 points
 1 = 5 points 4 = 30 points
 2 = 10 points 5 or more = 50 points

- ii. List the number of bypasses, overflows or unpermitted discharges shown in A (i) that were within the collection system and the number at the treatment plant

Collection System: 0 Treatment Plant: 0

B.

- i. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system:

7 ✓ Check one box. 0 = 0 points 3 = 15 points
 1 = 5 points 4 = 30 points
 2 = 10 points 5 or more = 50 points

- ii. List the number of bypasses, overflows or unpermitted discharges shown in B (i) that were within the collection system and the number at the treatment plant

Collection System: 6 Treatment Plant: 1

- C. Specify whether the bypasses came from the city/village/town sewer system or from contract or tributary communities/sanitary districts, etc...

- D. Add the point values checked for A and B and place the total in the box below.

TOTAL POINT VALUE FOR PART 4: 50 (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

- E. List the person responsible (name and title) for reporting overflows, bypasses or unpermitted discharges to State and Federal authorities:

Charles M. O'Brien, Wastewater Laboratory Supervisor

Describe the procedure for gathering, compiling and reporting:

The procedure for gathering, compiling, and reporting is specified in the permit.

PART 5: SLUDGE STORAGE AND DISPOSAL SITES

A. Sludge Storage

How many months of sludge storage capacity does your facility have available, either on-site or off-site?

Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	<2	2	3	4-5	>6
<i>points</i>	50	30	20	10	0

Write 0, 10, 20, 30 or 40 in the A point total box A Point Total

B. For how many months does your facility have access to (and approval for) sufficient land disposal sites to provide proper land disposal?

Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	<2	6-11	12-23	24-35	>36
<i>points</i>	50	30	20	10	0

Write 0, 10, 20, 30 or 40 in the B point total box B Point Total

C. Add together the A and B point values and place the sum in the box below at the right:

TOTAL POINT VALUE FOR PART 5: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

Permit #:

LA 0036439

PART 6: NEW DEVELOPMENT

- A. Please provide the following information for the total of all sewer line extensions which were installed during the last year.

Design Population: 84
Design Flow: 0.03 MGD
Design BOD: 200 mg/l

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings to the sewerage system were significantly increased (5% or greater)?

√ Check one box. Yes = 15 points No = 0 points

If Yes, Please describe:

List any new pollutants:

- C. Is there any development (industrial, commercial or residential) anticipated in the next 2-3 years, such that either flow or pollutant loadings to the sewerage system could significantly increase?

√ Check one box. Yes = 15 points No = 0 points

If Yes, Please describe:

List any new pollutants you anticipate:

- D. Add together the point value checked in B and C and place the sum in the box below.

TOTAL POINT VALUE FOR PART 6: (max = 30)

Also enter this value or 30, whichever is less, on the point calculation table on page 16.

PART 7: OPERATOR CERTIFICATION AND EDUCATION

A. What was the name of the operator-in-charge for the reporting year?

Name: Calvin Hayes

B. What is his or her certification number:

Cert.#: 07130

C. What level of certification is the operator-in-charge required to have to operate the wastewater treatment facility?

Level Required: Wastewater Treatment IV

D. What is the level of certification of the operator-in-charge?

Level Certified: Wastewater Treatment IV

E. Was the operator-in-charge of the report year certified at least at the grade level required in order to operate this plant?

√ Check one box. Yes = 0 points No = 50 points

Write 0 or 50 in the E point total box E Point Total

F. Has the operator-in-charge maintained recertification requirements during the reporting year?

√ Check one box. Yes No

G. How many hours of continuing education has the operator-in-charge completed over the last two calendar years?

√ Check one box. > 12 hours = 0 points < 12 hours = 50 points

Write 0 or 50 in the G point total box G Point Total

H. Is there a written policy regarding continuing education an training for wastewater treatment plant employees?

√ Check one box. Yes No

Explain: 16 hours of continuing education in a two year period.

I. What percentage of the continuing education expenses of the operator-in-charge were paid for:

By the permittee? 100% By the operator? 0%

J. Add together the E and G point values and place the sum in the box below at the right.

TOTAL POINT VALUE FOR PART 7: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

PART 8: FINANCIAL STATUS

A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses?

√ Check one box. Yes No *If No, How are O&M costs financed?*

SAME AS B.

B. What financial resources do you have available to pay for your wastewater improvements and reconstruction needs?

Wastewater improvements and reconstruction needs are funded from four main revenue sources. They are one half percent sales and use tax, sewer user fees, sewer impact fees, and a \$4 million subsidy from the general fund supported from gaming revenues.

Permit #:

LA 0036439

PART 9: SUBJECTIVE EVALUATION

A. Collection System Maintenance

- i. Describe what sewer system maintenance work has been done in the last year.

SEE ATTACHMENT

- ii. Describe what lift station work has been done in the last year.

SEE ATTACHMENT

- iii. What collection system improvements does the community have under construction for the next 5 years?

SEE ATTACHMENT

B. If you have ponds please answer the following questions:

√ Check one box.

- | | | |
|---|------------------------------|-----------------------------|
| i. Do you have duckweed buildup in the ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| ii. Do you mow the dikes regularly (at least monthly), to the waters edge? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| iii. Do you have bushes or trees growing on the dikes or in the ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| iv. Do you have excess sludge buildup (> 1foot) on the bottom of any of your ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| v. Do you exercise all of your valves? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| vi. Are your control manholes in good structural shape? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| vii. Do you maintain at least 3 feet of freeboard in all of your ponds? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |
| viii. Do you visit your pond system at least weekly? | <input type="checkbox"/> Yes | <input type="checkbox"/> No |

LA0036439 NORTH PLANT

LA MWPP Environmental Audit

Part 9: Subjective Evaluation

- A1.** As part of the Consent Decree, Operation and Maintenance of the North Treatment Plant Collection Area is performed and reported on a quarterly basis. The following table is a breakdown / summary of activities performed within the North Treatment Plant Collection System Area during the reporting period.

North Treatment Area
Monitoring Period (9/10- 8/11)

Line Cleaned	7%
CCTV Inspected	2%
Smoke Tested	1%
Dye Tested	5
Manhole Inspected	1%
Line Repaired	1557
Manhole Rehabilitated	12%
Force Main – Inspected	77%
Repaired	74
Air Release Valves – Inspected	176%
Repaired	233
Wet Wells Cleaned	126%
Pump Stations - Repaired	25%

- A2.** As shown above, an extensive routine pump station maintenance program is in place. Additionally, the attached Capital Improvement Plan outlines the construction projects that have been completed.
- A3.** The attached Capital Improvement Plan outlines the construction projects that are currently in the planning phase, or currently under design, including estimated completion dates.

North WWTP 2010 - 2011 Annual Audit

	3rd QTR 2010	4th QTR 2010	1st QTR 2011	2nd QTR 2011	TOTAL	%
Line Cleaned	34,771	35,750	52,012	45,102	167,635	7%
CCTV Inspected	12,271	4,097	5,193	20,465	42,026	2%
Smoke Tested	0	0	4,270	10,897	15,167	1%
Dye Tested	0	0	1	4	5	
Manhole Inspected	0	0	28	32	60	1%
Line Repaired	313	387	363	494	1,557	
Manhole Rehabilitated	16	387	363	494	1,260	12%
Force Main – Inspected	21.1	27	29	14	92.0	77%
Repaired	3	3	1	67	74	
Air Release Valves – Inspected	133	172	212	72	589	176%
Repaired	75	82	46	30	233	
Wet Wells Cleaned	73	15	42	48	178	126%
Pump Stations - Repaired	4	13	9	9	35	25%

NWWTP New Developments - Quarters 34 - 37

Subdivision / Development	# of lots	Design Pop.	Flow (gpm)	Flow (MGD)	Sewer Length (ft.)
Kings Children Subdivision	21	84	18	0.03	1318
		0	0	0.00	
TOTAL	21	84	17.5	0.03	1318

C. Treatment Plants

i. Have the influent and effluent flow meters been calibrated in the last year?

Yes No (√ Check one box.)

see below
Influent flow meter calibration date(s)

see below
Effluent flow meter calibration date(s)

ii. What problems, if any, have been experienced over the last year that have threatened treatment?

iii. Is your community presently involved in formal planning for treatment facility upgrade?

√ Check one box. Yes No *If Yes, Please describe:*

Gravity 02-11-2011
08-01-2011

Final Effluent 02-16-2011
08-08-2011

Forcemain 02-15-2011
08-09-2011

D. Preventive Maintenance

- i. Does your plant have a written plan for preventive maintenance on major equipment items?

√ Check one box. Yes No *If Yes, Please describe:*

Weekly, monthly and semi-annually preventive maintenance sheets that reflect type and frequency as specified in the O & M manuals. A new computer program will manage the maintenance and preventive maintenance of plant equipment and spare parts.

- ii. Does this preventive maintenance program depict frequency of intervals, types of lubrication and other preventive maintenance tasks necessary for each piece of equipment?

Yes No

- iii. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assured properly?

Yes No

E. Sewer Use Ordinance

- i. Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS or pH) or toxic substances to the sewer system from industries, commercial users and residences?

√ Check one box. Yes No *If Yes, Please describe:*

Sewer User Fee Ordinance (No. 7853) limits the discharge of BOD & TSS to 200 mg/l and 250 mg/l respectively. Any discharge above these limits is surcharged at a rate of 2% of the monthly sewer user fee for each limit of 10 mg/l. Pretreatment Ordinance (No. 9195) limits the discharge of heavy metals, chemical and toxic substances.

- ii. Has it been necessary to enforce?

√ Check one box. Yes No *If Yes, Please describe:*

The Sewer User Fee Ordinance is strictly enforced by the City Parish and self monitoring sampling. The same apply to the Pretreatment Ordinance. Enforcement mechanisms include discharge permits, surcharges, letter of violations, administrative orders, water termination, and fines.

- iii. Any additional comments about your treatment plant or collection system? (Attach additional sheets if necessary.)

NO

POINT CALCULATION TABLE

	Actual Values	Maximum
Part 1: <i>Influent Flow/Loadings</i>	<u>0</u>	80 points
Part 2: <i>Effluent Quality / Plant Performance</i>	<u>70</u>	100 points
Part 3: <i>Age of WWTF</i>	<u>32.5</u>	50 points
Part 4: <i>Overflows and Bypasses</i>	<u>50</u>	100 points
Part 5: <i>Ultimate Disposition of Sludge</i>	<u>10</u>	100 points
Part 6: <i>New Development</i>	<u>0</u>	30 points
Part 7: <i>Operator Certification Training</i>	<u>0</u>	100 points

TOTAL POINTS:

162.5

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

Resolved that the village/town/city of BATON ROUGE informs the Louisiana Department of Environmental Quality that the following actions were taken by CITY/PARISH METROPOLITAN COUNCIL (governing body).

1. Resolved the Municipal Water Pollution Prevention Environmental Audit Report which is attached to this resolution.
2. Set forth the following actions necessary to maintain permit requirements contained in the Louisiana Pollution Discharge Elimination System (LPDES) permit, number LA 0036439 AI#4843 .

(Please be specific in listing the actions that will be taken to address the problems identified in the audit report.)

- a. CURRENTLY, WE ARE OPERATING UNDER A CONSENT DECREE WHICH BECAME EFFECTIVE MARCH 14, 2002.
- b. IMPLEMENTATION OF AGGRESSIVE PROCESS CONTROL STRATEGIES.
- c. A PROJECT IS UNDERWAY TO REDUCE THE HIGH CONCENTRATION OF HYDROGEN SULFIDE (H₂S).
- d.

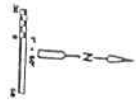
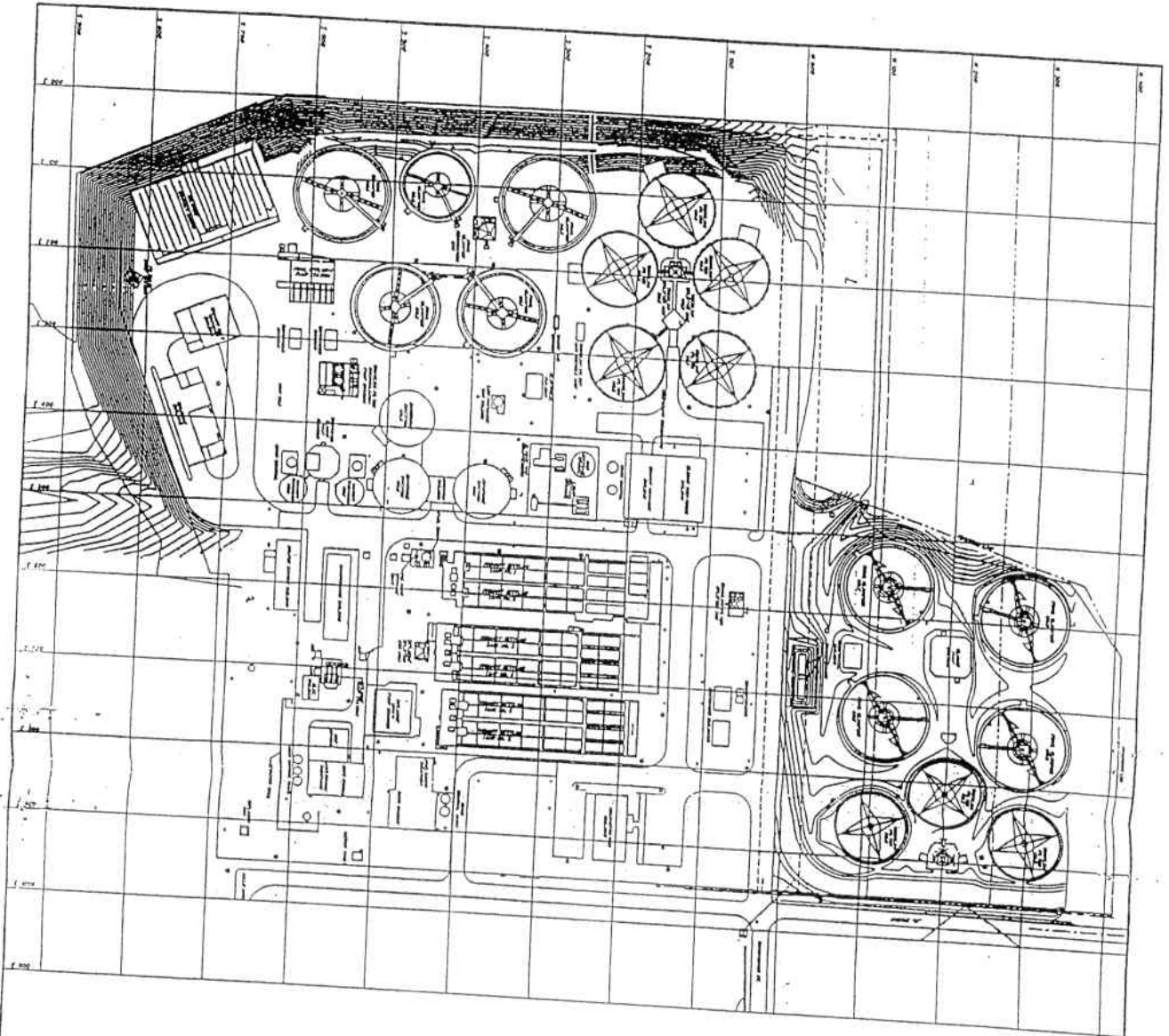
etc..

Passed by a majority/unanimous (circle one) vote of the CITY/PARISH METROPOLITAN COUNCIL on 11-22-11 (date).



CLERK

LA0036439



LEGEND
 1. EXISTING BUILDING FOOTPRINT
 2. EXISTING DRIVEWAY
 3. EXISTING DRIVEWAY

- GENERAL NOTES:**
1. EXISTING BUILDING FOOTPRINTS ARE SHOWN AS DOTTED LINES. ALL NEW BUILDING FOOTPRINTS ARE SHOWN AS SOLID LINES. ALL EXISTING DRIVEWAYS ARE SHOWN AS SOLID LINES. ALL NEW DRIVEWAYS ARE SHOWN AS DOTTED LINES.
 2. THE EXISTING DRIVEWAY SHALL BE MAINTAINED AS SHOWN ON THIS PLAN. ALL NEW DRIVEWAYS SHALL BE CONSTRUCTED AS SHOWN ON THIS PLAN.
 3. ALL PROPOSED DRIVEWAYS SHALL BE CONSTRUCTED TO MEET THE REQUIREMENTS OF THE CITY OF BATON ROUGE, LOUISIANA, AND THE STATE OF LOUISIANA.
 4. THE EXISTING DRIVEWAY SHALL BE MAINTAINED AS SHOWN ON THIS PLAN. ALL NEW DRIVEWAYS SHALL BE CONSTRUCTED AS SHOWN ON THIS PLAN.
 5. THE EXISTING DRIVEWAY SHALL BE MAINTAINED AS SHOWN ON THIS PLAN. ALL NEW DRIVEWAYS SHALL BE CONSTRUCTED AS SHOWN ON THIS PLAN.
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PHASE-III

NW/WTP - EXISTING SITE PLAN

CITY OF BATON ROUGE / PARISH OF EAST BATON ROUGE

CAMP DRESSER & MARKE INC. CDM

PROFESSIONAL ENGINEERING CORPORATION

PROJECT NO. 24000/1/2

SHEET NO. CN-1

DATE	BY	CHK	APP
12/31/2024	J. SMITH	J. SMITH	J. SMITH

ADOPTED
METROPOLITAN COUNCIL

NOV 22 2011

296

RESOLUTION 49010


COUNCIL ADMINISTRATOR TREASURER

REQUESTING APPROVAL FOR SUBMITTAL OF THE LOUISIANA MUNICIPAL WATER POLLUTION PREVENTION (MWPP) ENVIRONMENTAL AUDIT FOR THE CENTRAL WASTEWATER TREATMENT PLANT (LA 0036421 AI# 4842) TO THE DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ) FOR THE MONITORING PERIOD OF SEPTEMBER 1, 2010 THROUGH AUGUST 31, 2011.

BE IT RESOLVED by the Metropolitan Council of the Parish of East Baton Rouge and City of Baton Rouge that the submittal of the Louisiana Municipal Water Pollution Prevention (MWPP) Environmental Audit Report for the Central Wastewater Treatment Plant (LA 00036421 AI# 4842) to the Department of Environmental Quality (DEQ) for the monitoring period of September 1, 2010 through August 31, 2011, is hereby approved.

LOUISIANA

MUNICIPAL WATER POLLUTION PREVENTION

MWPP



<i>Facility Name:</i>	City of Baton Rouge and Parish of East Baton Rouge Central WW Treatment Plant
<i>LPDES Permit Number:</i>	LA0036421
<i>Agency Interest (AI) Number:</i>	4842
<i>Address:</i>	2443 River Road
	Baton Rouge, LA
<i>Parish:</i>	East Baton Rouge
<i>(Person Completing Form) Name:</i>	Cynthia Thomas
<i>Title:</i>	Assistant Wastewater Laboratory Supervisor
<i>Date Completed:</i>	October 24, 2011

INSTRUCTIONS

1. Complete only the sections of the Environmental Audit which apply to your wastewater treatment system. Leave sections that do not apply blank and enter a "0" for the point value.
2. Parts 1 through 7 contain questions for which points may be generated. These points are intended to communicate to the department and the governing body or owner what actions will be necessary to prevent effluent violations. Place the point totals from parts 1 through 7 on the Point Calculation page.
3. Add up the point totals.
4. Submit the Environmental Audit to the governing body or owner for review and approval.
5. The governing body must pass a resolution which contains the following items:
 - a. The resolution or letter must acknowledge the governing body or owner has reviewed the Environmental Audit.
 - b. This resolution must indicate specific actions, if any, will be taken to maintain compliance and prevent effluent violations. Proposed actions should address the parts where maximum or close to maximum points were generated in the Environmental Audit.
 - c. The resolution should provide any other information the governing body deems appropriate.

Permit #:

LA0036421

PART 1: INFLUENT FLOW/LOADINGS (all plants)

A. List the average monthly volumetric flows and BOD loadings received at your facility during the last reporting year.

Column 1 Average Monthly Flow (million gallons per day, MGD)		Column 2 Average Monthly BOD ₅ Concentration (mg/l)		Column 3 Average Monthly BOD ₅ Loading (pounds per day, lb/day)
9.02	x	151	x 8.34 =	11,359
8.20	x	149	x 8.34 =	10,190
9.67	x	139	x 8.34 =	11,210
9.17	x	136	x 8.34 =	10,401
11.21	x	102	x 8.34 =	9,536
10.75	x	124	x 8.34 =	11,117
12.51	x	114	x 8.34 =	11,894
9.27	x	120	x 8.34 =	9,277
9.03	x	144	x 8.34 =	10,845
8.77	x	137	x 8.34 =	10,020
11.56	x	113	x 8.34 =	10,894
10.58	x	122	x 8.34 =	10,765

BOD loading = Average Monthly Flow (in MGD) x Average Monthly BOD concentration (in mg/l) x 8.34

B. List the design flow and design BOD loading for your facility in the blanks below. If you are not aware of these design quantities, refer to your Operation and Maintenance (O&M) Manual or contact your consulting engineer.

Design Flow, MGD:	32	x 0.90 =	28.80
Design BOD, lb/day:	55,244	x 0.90 =	49,720

Permit #:

LA0036421

- C. How many months did the monthly flow (Column 1) to the wastewater treatment facility (WWTF) exceed 90% of design flow? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	0	0	0	0	5	5	5	5	5	5	5	5

Write 0 or 5 in the C point total box C Point Total

- D. How many months did the monthly flow (Column 1) to the WWTF exceed the design flow? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	5	5	10	10	15	15	15	15	15	15	15	15

Write 0, 5, 10 or 15 in the D point total box D Point Total

- E. How many months did the monthly BOD loading (Column 3) to the WWTF exceed 90% of the design loading? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	0	5	5	5	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the E point total box E Point Total

- F. How many months did the monthly BOD loading (Column 3) to the WWTF exceed the design loading? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

months	<input type="radio"/> 0	1	2	3	4	5	6	7	8	9	10	11	12
points	<input type="radio"/> 0	10	20	30	40	50	50	50	50	50	50	50	50

Write 0, 10, 20, 30, 40 or 50 in the F point total box F Point Total

- G. Add together each point total for C through F and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 1: (max = 80)

Also enter this value or 80, whichever is less, on the point calculation table on page 16.

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PART 2: EFFLUENT QUALITY / PLANT PERFORMANCE

A. List the monthly average effluent BOD and TSS concentrations produced by your facility during the last reporting year.

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
SEPTEMBER	25	19
OCTOBER	17	16
NOVEMBER	20	18
DECEMBER	23	20
JANUARY	25	20
FEBRUARY	26	21
MARCH	23	24
APRIL	24	23
MAY	21	19
JUNE	24	17
JULY	21	14
AUGUST	17	14

B. List the monthly average permit limits for your facility in the blanks below.

	Permit Limit		90% of Permit Limit
BOD, mg/l	30	x 0.90 =	27
TSS, mg/l	30	x 0.90 =	27

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C. Continuous Discharge to Surface Water.

- i.** How many months did the effluent BOD (Column 1) exceed 90% of the permit limits? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	0	10	20	30	40	40	40	40	40	40	40	40

Write 0, 10, 20, 30 or 40 in the i point total box 0 i Point Total

- ii.** How many months did the effluent BOD (Column 1) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	5	5	10	10	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the ii point total box 0 ii Point Total

- iii.** How many months did the effluent TSS (Column 2) exceed 90% of the permit limits? Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	0	10	20	30	40	40	40	40	40	40	40	40

Write 0, 10, 20, 30 or 40 in the iii point total box 0 iii Point Total

- iv.** How many months did the effluent TSS (Column 2) exceed permit limits? Circle the number of months and corresponding point total. Write the point total in the box below at the right.

<i>months</i>	0	1	2	3	4	5	6	7	8	9	10	11	12
<i>points</i>	0	5	5	10	10	10	10	10	10	10	10	10	10

Write 0, 5, or 10 in the iv point total box 0 iv Point Total

- v.** Add together each point total for i through iv and place this sum in the box below at the right.

TOTAL POINT VALUE FOR PART 2: 0 (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

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D. Other Monitoring and Limitations

i. At any time in the past year was there an exceedance of a permit limit for other pollutants such as: ammonia-nitrogen, phosphorus, pH, total residual chlorine, or fecal coliform?

√ Check one box. Yes No *If Yes, Please describe:*

pH	12/29/2010	5.96 su
Fecal Coliform	03/15-21/2011	1502 col./100mL
Fecal Coliform	03/29-04/04/2011	642 col./100mL
Fecal Coliform	04/05-11/2011	445 col./100mL

ii. At any time in the past year was there a "failure" of a Biomonitoring (Whole Effluent Toxicity) test of the effluent?

√ Check one box. Yes No *If Yes, Please describe:*

iii. At any time in the past year was there an exceedance of a permit limit for a toxic substance?

√ Check one box. Yes No *If Yes, Please describe:*

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PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

A. What year was the wastewater treatment facility constructed or last major expansion/improvements completed?

1998

Current Year - Answer to A = Age in years

2011

1998

13

Enter Age in Part C below.

B. Check the type of treatment facility that is employed.

FACTOR:

Mechanical Treatment Plant
(trickling filter activated
sludge, etc...)
Specify Type: _____

2.5

Aerated Lagoon

2.0

Stabilization Pond

1.5

Other
Specify Type: _____

1.0

C. Multiply the factor listed next to the type of facility your community employs by the age of your facility to determine the total point value for Part 3.

TOTAL POINT VALUE FOR PART 3 =

$$\frac{25}{\text{Factor}} \times \frac{13}{\text{Age}} = \boxed{32.5} \text{ (max = 50)}$$

Also enter this value or 50, whichever is less, on the point calculation table on page 16.

D. Please attach a schematic of the treatment plant.

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PART 4: OVERFLOWS AND BYPASSES

A.

- i. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain:

0 √ Check one box. 0 = 0 points 3 = 15 points
 1 = 5 points 4 = 30 points
 2 = 10 points 5 or more = 50 points

- ii. List the number of bypasses, overflows or unpermitted discharges shown in A (i) that were within the collection system and the number at the treatment plant

Collection System: 0 Treatment Plant: 0

B.

- i. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system:

10 √ Check one box. 0 = 0 points 3 = 15 points
 1 = 5 points 4 = 30 points
 2 = 10 points 5 or more = 50 points

- ii. List the number of bypasses, overflows or unpermitted discharges shown in B (i) that were within the collection system and the number at the treatment plant

Collection System: 6 Treatment Plant: 4

- C. Specify whether the bypasses came from the city/village/town sewer system or from contract or tributary communities/sanitary districts, etc...

- D. Add the point values checked for A and B and place the total in the box below.

TOTAL POINT VALUE FOR PART 4: 50 (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

- E. List the person responsible (name and title) for reporting overflows, bypasses or unpermitted discharges to State and Federal authorities:

Charles M. O'Brien, Wastewater Laboratory Supervisor

Describe the procedure for gathering, compiling and reporting:

The procedure for gathering, compiling, and reporting is specified in the permit.

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PART 5: SLUDGE STORAGE AND DISPOSAL SITES

A. Sludge Storage

How many months of sludge storage capacity does your facility have available, either on-site or off-site?

Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	<2	2	3	4-5	>6
<i>points</i>	50	30	20	10	0

Write 0, 10, 20, 30 or 40 in the A point total box A Point Total

B. For how many months does your facility have access to (and approval for) sufficient land disposal sites to provide proper land disposal?

Circle the number of months and the corresponding point total. Write the point total in the box below at the right.

<i>months</i>	<2	6-11	12-23	24-35	>36
<i>points</i>	50	30	20	10	0

Write 0, 10, 20, 30 or 40 in the B point total box B Point Total

C. Add together the A and B point values and place the sum in the box below at the right:

TOTAL POINT VALUE FOR PART 5: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

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PART 6: NEW DEVELOPMENT

- A. Please provide the following information for the total of all sewer line extensions which were installed during the last year.

Design Population: 0

Design Flow: 0 MGD

Design BOD: 0 mg/l

- B. Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings to the sewerage system were significantly increased (5% or greater)?

Check one box. [] Yes = 15 points [x] No = 0 points

If Yes, Please describe:

Three horizontal lines for describing the answer to question B.

List any new pollutants:

Two horizontal lines for listing pollutants.

- C. Is there any development (industrial, commercial or residential) anticipated in the next 2-3 years, such that either flow or pollutant loadings to the sewerage system could significantly increase?

Check one box. [] Yes = 15 points [x] No = 0 points

If Yes, Please describe:

Three horizontal lines for describing the answer to question C.

List any new pollutants you anticipate:

Two horizontal lines for listing anticipated pollutants.

- D. Add together the point value checked in B and C and place the sum in the box below.

TOTAL POINT VALUE FOR PART 6: [0] (max = 30)

Also enter this value or 30, whichever is less, on the point calculation table on page 16.

PART 7: OPERATOR CERTIFICATION AND EDUCATION

- A. What was the name of the operator-in-charge for the reporting year?
Name: Walter Brock
- B. What is his or her certification number:
Cert.#: 16-255
- C. What level of certification is the operator-in-charge required to have to operate the wastewater treatment facility?
Level Required: Wastewater Treatment IV
- D. What is the level of certification of the operator-in-charge?
Level Certified: Wastewater Treatment IV
- E. Was the operator-in-charge of the report year certified at least at the grade level required in order to operate this plant?
√ Check one box. Yes = 0 points No = 50 points
Write 0 or 50 in the E point total box E Point Total
- F. Has the operator-in-charge maintained recertification requirements during the reporting year?
√ Check one box. Yes No
- G. How many hours of continuing education has the operator-in-charge completed over the last two calendar years?
√ Check one box. > 12 hours = 0 points < 12 hours = 50 points
Write 0 or 50 in the G point total box G Point Total
- H. Is there a written policy regarding continuing education an training for wastewater treatment plant employees?
√ Check one box. Yes No
Explain: 16 hours of continuing education in a two year period.
- I. What percentage of the continuing education expenses of the operator-in-charge were paid for:
By the permittee? 100% *By the operator?* 0%
- J. Add together the E and G point vaules and place the sum in the box below at the right.

TOTAL POINT VALUE FOR PART 7: (max = 100)

Also enter this value or 100, whichever is less, on the point calculation table on page 16.

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PART 8: FINANCIAL STATUS

A. Are User-Charge Revenues sufficient to cover operation and maintenance expenses?

√ Check one box. Yes No *If No, How are O&M costs financed?*

SAME AS B.

B. What financial resources do you have available to pay for your wastewater improvements and reconstruction needs?

Wastewater improvements and reconstruction needs are funded from four main revenue sources. They are one half percent sales and use tax, sewer user fees, sewer impact fees, and a \$4 million subsidy from the general fund supported from gaming revenues.

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PART 9: SUBJECTIVE EVALUATION

A. Collection System Maintenance

i. Describe what sewer system maintenance work has been done in the last year.

SEE ATTACHMENT

ii. Describe what lift station work has been done in the last year.

SEE ATTACHMENT

iii. What collection system improvements does the community have under construction for the next 5 years?

SEE ATTACHMENT

B. If you have ponds please answer the following questions:

√ Check one box.

- i. *Do you have duckweed buildup in the ponds?* Yes No
- ii. *Do you mow the dikes regularly (at least monthly), to the waters edge?* Yes No
- iii. *Do you have bushes or trees growing on the dikes or in the ponds?* Yes No
- iv. *Do you have excess sludge buildup (> 1foot) on the bottom of any of your ponds?* Yes No
- v. *Do you excersise all of your valves?* Yes No
- vi. *Are your control manholes in good structural shape?* Yes No
- vii. *Do you maintain at least 3 feet of freeboard in all of your ponds?* Yes No
- viii. *Do you visit your pond system at least weekly?* Yes No

LA0036421 CENTRAL PLANT

LA MWPP Environmental Audit

Part 9: Subjective Evaluation

A1. As part of the Consent Decree, Operation and Maintenance of the Central Treatment Plant Collection Area is performed and reported on a quarterly basis. The following table is a breakdown/summary of activities performed within the Central Treatment Plant Collection System Area during the reporting period.

Central Treatment Area
Monitoring Period (9/10 – 8/11)

Line Cleaning	37%
CCTV Inspections	33%
Smoke Testing	1%
Dye Testing	
Manhole Inspection	37%
Line Repaired	2169
Manhole Rehabilitation	6%
Force Main-Inspections	4%
Repaired	
Air Release Valves-Inspections	11%
Repaired	2
Wet Well Cleaned	143%
Pump Stations-Repaired	5%

A2. As shown above, an extensive routine pump station maintenance program is in place. Additionally, the attached Capital Improvement Plan outlines the construction projects that have been completed.

A3. The attached Capital Improvement Plan outlines the construction projects that are currently in the planning phase, or currently under design, including estimated completion dates.

Central WWTP 2010 - 2011 Annual Audit

	3rd QTR 2010	4th QTR 2010	1st QTR 2011	2nd QTR 2011	TOTAL	%
Line Cleaned	185,680	150,680	168,160	14,714	519,234	37%
CCTV Inspected	179,930	138,680	146,410	5,464	470,484	33%
Smoke Tested	3,287	308	3,468	1,452	8,515	1%
Dye Tested	0	0	1	0	1	
Manhole Inspected	986	898	210	33	2,127	37%
Line Repaired	34	313	1,556	266	2,169	
Manhole Rehabilitated	1	18	47	266	332	6%
Force Main – Inspected	0	0	0	0	0.4	4%
Repaired	7	0	0	13	20	
Air Release Valves – Inspected	0	0	0	2	2	11%
Repaired	0	0	0	2	2	
Wet Wells Cleaned	21	0	7	2	30	143%
Pump Stations - Repaired	1	0	0	0	1	5%

CWWTP New Developments - Quarters 34 - 37

Subdivision / Development	# of lots	Design Pop.	Flow (gpm)	Flow (MGD)	Sewer Length (ft.)
CVS Pharmacy Florida@Lobdell (Sewer Extension)	0	0	0	0.00	110
TOTAL	0	0	0	0.00	110

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C. Treatment Plants

i. Have the influent and effluent flow meters been calibrated in the last year?

Yes No (✓ Check one box.)

Influent Flow Meter 09/27/2010
Influent flow meter calibration date(s)

Effluent Flow Meter 3/11/2011; 08/04/2011
Effluent flow meter calibration date(s)

ii. What problems, if any, have been experienced over the last year that have threatened treatment?

iii. Is your community presently involved in formal planning for treatment facility upgrade?

✓ Check one box. Yes No *If Yes, Please describe:*

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D. Preventive Maintenance

- i. Does your plant have a written plan for preventive maintenance on major equipment items?

√ Check one box. Yes No *If Yes, Please describe:*

Weekly, monthly and semi-annually preventive maintenance sheets that reflect type and frequency as specified in the O & M manuals. A new computer program will manage the maintenance and preventive maintenance of plant equipment and spare parts.

- ii. Does this preventive maintenance program depict frequency of intervals, types of lubrication and other preventive maintenance tasks necessary for each piece of equipment?

Yes No

- iii. Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assured properly?

Yes No

E. Sewer Use Ordinance

- i. Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS or pH) or toxic substances to the sewer system from industries, commercial users and residences?

√ Check one box. Yes No *If Yes, Please describe:*

Sewer User Fee Ordinance (No. 7853) limits the discharge of BOD & TSS to 200 mg/l and 250 mg/l respectively. Any discharge above these limits is surcharged at a rate of 2% of the monthly sewer user fee for each limit of 10 mg/l. Pretreatment Ordinance (No. 9195) limits the discharge of heavy metals, chemical and toxic substances.

- ii. Has it been necessary to enforce?

√ Check one box. Yes No *If Yes, Please describe:*

The Sewer User Fee Ordinance is strictly enforced by the City Parish and self monitoring sampling. The same apply to the Pretreatment Ordinance. Enforcement mechanisms include discharge permits, surcharges, letter of violations, administrative orders, water termination, and fines.

- iii. Any additional comments about your treatment plant or collection system? (Attach additional sheets if necessary.)

NO

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POINT CALCULATION TABLE

	Actual Values	Maximum
Part 1: <i>Influent Flow/Loadings</i>	<u>0</u>	80 points
Part 2: <i>Effluent Quality / Plant Performance</i>	<u>0</u>	100 points
Part 3: <i>Age of WWTF</i>	<u>32.5</u>	50 points
Part 4: <i>Overflows and Bypasses</i>	<u>50</u>	100 points
Part 5: <i>Ultimate Disposition of Sludge</i>	<u>10</u>	100 points
Part 6: <i>New Development</i>	<u>0</u>	30 points
Part 7: <i>Operator Certification Training</i>	<u>0</u>	100 points

TOTAL POINTS:

92.5

ATTACHMENT

SAMPLE MWPP RESOLUTION

Resolved that the village/town/city of BATON ROUGE informs the Louisiana Department of Environmental Quality that the following actions were taken by CITY/PARISH METROPOLITAN COUNCIL (governing body).

1. Resolved the Municipal Water Pollution Prevention Environmental Audit Report which is attached to this resolution.
2. Set forth the following actions necessary to maintain permit requirements contained in the Louisiana Pollution Discharge Elimination System (LPDES) permit, number LA 0036421 AI#4842.

(Please be specific in listing the actions that will be taken to address the problems identified in the audit report.)

- a. CURRENTLY, WE ARE OPERATING UNDER A CONSENT DECREE WHICH BECAME EFFECTIVE MARCH 14, 2002.
 - b.
 - c.
 - d.
- etc..

Passed by a majority/unanimous (circle one) vote of the CITY/PARISH METROPOLITAN COUNCIL on 11-22-11 (date).



CLERK

ADOPTED
METROPOLITAN COUNCIL

NOV 22 2011

298

RESOLUTION

49012

Brian Maynard
COUNCIL ADMINISTRATOR TREASURER

REQUESTING APPROVAL FOR SUBMITTAL OF THE LOUISIANA MUNICIPAL WATER POLLUTION PREVENTION (MWPP) ENVIRONMENTAL AUDIT FOR THE SOUTH TREATMENT PLANT (LA 0036412 AI# 4841) TO THE DEPARTMENT OF ENVIRONMENTAL QUALITY (DEQ) FOR THE MONITORING PERIOD OF SEPTEMBER 1, 2010 THROUGH AUGUST 31, 2011.

BE IT RESOLVED by the Metropolitan Council of the Parish of East Baton Rouge and City of Baton Rouge that the submittal of the Louisiana Municipal Water Pollution Prevention (MWPP) Environmental Audit Report for the South Wastewater Treatment (LA 00036412 AI# 4841) to the Department of Environmental Quality (DEQ) for the monitoring period of September 1, 2010 through August 31, 2011, is hereby approved.

Attachment D
Updated Exhibit H - Outreach and Public
Awareness Plan

Outreach and Public Awareness Plan

The original *Outreach and Public Awareness Plan* (March 2001) was developed for the City of Baton Rouge/ East Baton Rouge Parish (City/Parish) and conformed to the requirements of the 2002 Consent Decree Section XV – Outreach and Public Awareness, and therefore was subsequently included as Exhibit H of the Consent Decree. That plan presented a general overview of the type of communication and outreach tasks to be undertaken to inform City/Parish residents about the Sanitary Sewer Overflow (SSO) Control and Wastewater Facilities Program (SSO Program) activities, educate the public about its role in protecting infrastructure, health, and the environment, and gain public support for, and understanding of, the SSO Program.

To more accurately reflect the nature and extent of the activities that are currently being implemented, this *Updated Exhibit H – Outreach and Public Awareness Plan* (August 2010) is intended to be issued to replace the original *Exhibit H Outreach and Public Awareness Plan* (March 2001). This *Updated Exhibit H – Outreach and Public Awareness Plan* conforms to the requirements of the Consent Decree and includes some slight alterations and additional public education and community outreach activities that were not reflected in the 2001 plan. The rest of this document depicts a summary of the on-going outreach activities being undertaken by the City/Parish.

Outreach Activities

Outreach activities that are currently being implemented can be categorized into the following areas:

- Public Education Information
- SSO Program Website
- On-Going Community Outreach

Public Education Information

The SSO Program provides educational information to the public using a variety of approaches including:

- Preparing and distributing monthly SSO Program Progress Reports to the Mayor-President’s Office, Metro Council Members, Department of Public Works (DPW), community stakeholders, the SSO Program mailing list, and others as requested.
- Providing community leadership and community meeting attendees with copies of the monthly SSO Program Progress Report.
- Developing and distributing educational materials about SSOs (such as an SSO Fact Sheet or Consent Decree Fact Sheet) at community meetings, events, and as requested.
- Including a description and status of the SSO Program in each year’s budget message and budget highlight report from the Mayor-President.

SSO Program Website

The SSO Program developed and currently maintains a Program website at www.brprojects.com in order to provide comprehensive information to the public in an easily accessible format. The website is

a useful public education tool that is being continuously updated with new information about the program, public meetings, project information, regulatory information and associated reference documents, and news articles about the SSO Program. Specifically, the website contains information about the following:

- General SSO Program Information
- Regulatory Information (including Consent Decree and Modification, Regulatory Reports, and Fact Sheets) Program Project Maps and Individual Project Fact Sheets
- SSO Information and Fact Sheets
- Monthly SSO Program Progress Reports
- Public Meeting Information and Presentations
- Consultant/Contractor Information
- Information About Reporting Sewer Emergencies

On-Going Community Outreach

The SSO Program community outreach increases local public awareness through targeted community interaction including:

- Attending leadership and community meetings in Metro Council Districts, as requested, to present information on projects in each District, respond to community questions and concerns, and provide updates on SSO Program progress.
- Appearance of the Director of DPW on TV, radio, and in front of neighborhood, professional and civic groups to discuss various topics related to the SSO Program, as requested.
- Developing and delivering SSO Program presentations to professional associations and other interested groups, and post presentations on the SSO Program website for public viewing.
- Meeting with Metro Council Members to discuss the SSO Program projects in their Districts and provide updates on progress.
- Providing construction-related information to Metro Council Members and potentially affected residents and businesses including notice letters and door hangers.
- Meeting regularly with the Mayor-President's Office and DPW to keep them informed of the SSO Program's status.
- Working with the Mayor-President's Office, Metro Council Staff, and/or DPW to address community questions related to the SSO Program and provide responses to citizens.
- Create and maintain an SSO Program database of public concerns, questions, and responses pertaining to the Program.
- Develop and maintain a Program database of community events and outreach activities where SSO Program was presented.