



Baton Rouge SSO Program

2002 Consent Decree

Quarterly Report No. 9

July 26, 2004



Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, Louisiana
70821

July 26, 2004

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
Ninth Quarterly Report - **Period Ending June 30, 2004**

Gentlemen:

Pursuant to Paragraph 51 of the Consent Decree, the City of Baton Rouge and Parish of East Baton Rouge hereby submits the 9th Consent Decree Quarterly Report covering activities for the quarter ending June 30, 2004. This report contains a summary of compliance with and activities related to:

- Cross Connection Elimination Plan
- Collection System Preventive Maintenance Program (PMP)
- Sanitary Sewer Overflow Response Plan (SSORP)
- Reporting of Unauthorized Discharges
- Supplemental Environmental Projects (SEP)
- Consent Decree Compliance Status

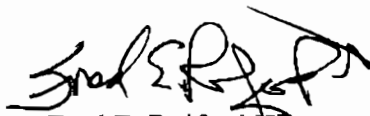
These activities are described in Sections VIII, IX, X, XI, XX and XXI of the Consent Decree.

Pursuant to Paragraph 49 and 117 of the Consent Decree, the City of Baton Rouge and Parish of East Baton Rouge hereby submits for review and approval three copies of the 9th Consent Decree Quarterly Report to the US EPA and LDEQ and one copy to the US DOJ and City/Parish DPW.

I certify that the information contained in or accompanying this Ninth Quarterly Report 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.

Sincerely,

A handwritten signature in black ink, appearing to read "Fred E. Raiford III". The signature is stylized and somewhat cursive, with a prominent flourish at the end.

Fred E. Raiford III
Director

Cc: Honorable Bobby Simpson, Mayor-President
Mr. Paul Thompson, Chief Administrative Officer
Chief, Environmental Enforcement Section, US DOJ
Mr. Bruce Hammatt, LDEQ
Ms. Peggy Hatch, LDEQ
Mr. Harold Leggett, LDEQ
Mr. Carlos Zequeira, (6RC-EA)
Ms. Vivian Hare, (6EN-WC)
Mr. Jim Thompson
Ms. Irys Allgood
Mr. Jeff Broussard
Mr. Bryan Harmon
Mr. Kent A. Mudd
Mr. Richard Wright
Mr. Robert Groht
Mr. Mark LeBlanc
Mr. David Ratcliff
Mr. Bill McHie, MWH

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Part A:
Cross Connection
Elimination Plan

Baton Rouge Consent Decree Quarterly Report Part A - Cross Connection Elimination Plan

Requirement: Pursuant to Paragraph 16, Section VIII of the Consent Decree, if the City/Parish identifies any Cross Connection in the Collection System, it shall be permanently sealed or eliminated within 30 days of identification or if the City/Parish elects to have the work performed by a contractor, within 60 days of identification.

Summary of Activities

No cross connections were discovered during this quarter. There is no anticipated non-compliance. During the reporting period 231,551 linear feet of sewer was smoke tested to identify violations of City/Parish ordinances regarding private cross connections. No private cross connections were identified. There were no exceptions in enforcing the ban on private cross connections.

Summary	North Plant LA0036439 AI# 4843	Central Plant LA0036421 AI# 4842	South Plant LA0036412 AI# 4841	Total
Total No. of Cross Connections Identified:	0	0	0	0
Total No. of Cross Connections Eliminated:	0	0	0	0
Total No. of Private Cross Connections Identified:	0	0	0	0
Total No. of Private Cross Connections Eliminated:	0	0	0	0

Part A – Cross Connection Elimination Plan

Summary of Cross Connections Identified						
Number	Date Identified	Location	Private (Y/N)	Current Status	Notice Date	Date Eliminated
North Plant (LA0036439 AI# 4843)						
1						
2						
3						
Central Plant (LA0036421 AI# 4842)						
1						
2						
3						
South Plant (LA0036412 AI# 4841)						
1						
2						
3						

The City/Parish [is] [is not] in compliance with Section VIII Elimination of Cross Connections for the period 4 / 01 / 04 to 6 / 30 / 04. If not, see comments above.

Part B:
Preventive Maintenance
Program (PMP)

Baton Rouge Consent Decree Quarterly Report Part B - Preventive Maintenance Program (PMP)

Requirement: Pursuant to Exhibit I of the Consent Decree, the City/Parish shall report compliance and include a brief narrative summary of activities related to compliance and/or noncompliance with the Preventive Maintenance Program during the reporting period. In accordance with the Collection System Preventive Maintenance Plan, Paragraph 1.4, specific activities performed related to collection system preventive maintenance will be reported to the EPA and LDEQ on a quarterly basis.

Summary of Activities

During the reporting period we have followed our standard operating procedures, and continued to follow the equipment manufacturers' recommended operation and maintenance requirements, as referenced in the Collection System Preventive Maintenance Plan. A summary of the collection system preventive maintenance activities for this reporting period is provided in the table on page B-2. As indicated, the primary preventive maintenance activity is inspection of facilities, including gravity sewers (through CCTV), manholes, ARVs and other facilities. The annual goal for lines cleaned has already been exceeded during this reporting period. All other activities except two (manhole inspections and air release valves) have exceeded 50% of the annual goals, indicating we are on track to meet or exceed all annual goals. We provided information for each treatment plant service area and identified whether the activity was routine (standard preventive maintenance) or corrective (in response to a particular complaint or perceived problem) in nature.

We do not anticipate any non-compliance related to preventive maintenance activities in the future.

There were no problems encountered or deficiencies identified in the Preventive Maintenance Program plans.

Part B - Preventive Maintenance Program (PMP)

Summary of Collection System Activities

	Quarterly Total Apr-Jun 2004	Cumulative 2004 Annual Total	2004 Annual Goal
Gravity Collection System (8,510,000ft/38,000MH)			
Lines Cleaned (ft)	322,264	778,159	570,000
CCTV Inspected (ft)	217,484	569,359	570,000
Smoke Tested (ft)	231,551	464,888	----
Smoke Tested (no. of locations)	13	170	----
Dye Water Flooded (no. of locations)	64	137	----
Manholes Inspected (no.)	788	1,234	2,500
Lines Repaired (no.)	580	1,181	----
MH Rehabbed (no.)	162	219	----
Force Mains (240 miles)			
Visual Surface Inspection (miles)	35.0	66.3	120
Repaired (no.)	4	7	----
Air Release Valves (604)			
Inspected/Maintained	223	446	960 to 1,200
Repaired (no.)	33	60	----
Pump & Lift Stations (421)			
Inspections (no.)	15,762	32,354	45,136
Wet wells cleaned	109	236	----
Repaired (no.)	9	17	----
Peak Flow Storage Facilities (2)			
Little Peak site visits	38	77	104
Big Peak site visits	38	77	104

**Attached are separate Collection System Activity Sheets for each Treatment Plant Service Area.

The City/Parish [is] [is not] in compliance with Section IX Preventive Maintenance Program Plan for the period 4 / 01 / 04 to 6 / 30 / 04. If not, see comments above.

**Part B – Preventive Maintenance Program (PMP)
Summary of Activities by Treatment Plant Service Area**

North Plant (LA0036439 AI# 4843)

	<u>Routine Maintenance</u>	<u>Corrective Maintenance</u>	<u>Quarterly Total Apr-Jun 2004</u>
Gravity Collection System (2,460,000ft/10,640MH)			
Lines Cleaned (ft)	84,376	39,861	124,237
CCTV Inspected (ft)	84,376	0	84,376
Smoke Tested (ft)	9,370	10,922	20,292
Smoke Tested (no. of locations)	0	0	0
Dye Water Flooded (no. of locations)	0	21	21
Manholes Inspected (no.)	14	0	14
Lines Repaired (no.)	199	90	289
MH Rehabbed (no.)	0	6	6
Force Mains (120 miles)			
Visual Surface Inspection (miles)	12.0	0.0	12.0
Repaired (no.)	1	0	1
Air Release Valves (335)			
Inspected/Maintained	120	0	120
Repaired (no.)	0	25	25
Pump & Lift Stations (141)			
Inspections (no.)	5,106	0	5,106
Wet wells cleaned	36	0	36
Repaired (no.)	0	2	2

Routine Maintenance-Day to day maintenance work or operational activities carried out on a regular basis, to keep the collection system operating properly. Generally routine maintenance consists of visual, mechanical, electrical, and electronic checks to ensure proper functioning of equipment. Routine maintenance also consists of sewer cleaning, smoke testing, dye water flooding, manhole inspection, and CCTV inspection.

Corrective Maintenance-Maintenance which is required to restore an item to a specified working order/condition, normally initiated as a result of a scheduled or routine inspection. Generally corrective maintenance consists of rehabilitation of gravity lines, manholes, force mains, etc. and generally in conjunction with system inspection activities. Corrective maintenance also consists of repairing or replacing a failed structure such as a pump station or storage facility.

**Part B – Preventive Maintenance Program (PMP)
Summary of Activities by Treatment Plant Service Area**

Central Plant (LA0036421 AI# 4842)

	<u>Routine Maintenance</u>	<u>Corrective Maintenance</u>	<u>Quarterly Total Apr-Jun 2004</u>
Gravity Collection System (1,410,000ft/5,760MH)			
Lines Cleaned (ft)	110,954	27,005	137,959
CCTV Inspected (ft)	111,184	0	111,184
Smoke Tested (ft)	134,065	13,107	147,172
Smoke Tested (no. of locations)	12	0	12
Dye Water Flooded (no. of locations)	12	9	21
Manholes Inspected (no.)	426	0	426
Lines Repaired (no.)	0	69	69
MH Rehabbed (no.)	108	7	115
Force Mains (10 miles)			
Visual Surface Inspection (miles)	0.0	0.0	0.0
Repaired (no.)	0	1	1
Air Release Valves (18)			
Inspected/Maintained	0	0	0
Repaired (no.)	0	0	0
Pump & Lift Stations (21)			
Inspections (no.)	814	0	814
Wet wells cleaned	39	0	39
Repaired (no.)	0	6	6

Routine Maintenance-Day to day maintenance work or operational activities carried out on a regular basis, to keep the collection system operating properly. Generally routine maintenance consists of visual, mechanical, electrical, and electronic checks to ensure proper functioning of equipment. Routine maintenance also consists of sewer cleaning, smoke testing, dye water flooding, manhole inspection, and CCTV inspection.

Corrective Maintenance-Maintenance which is required to restore an item to a specified working order/condition, normally initiated as a result of a scheduled or routine inspection. Generally corrective maintenance consists of rehabilitation of gravity lines, manholes, force mains, etc. and generally in conjunction with system inspection activities. Corrective maintenance also consists of repairing or replacing a failed structure such as a pump station or storage facility.

**Part B – Preventive Maintenance Program (PMP)
Summary of Activities by Treatment Plant Service Area**

South Plant (LA0036412 AI# 4841)

	<u>Routine Maintenance</u>	<u>Corrective Maintenance</u>	<u>Quarterly Total Apr-Jun 2004</u>
Gravity Collection System (4,640,000ft/21,580MH)			
Lines Cleaned (ft)	21,924	38,144	60,068
CCTV Inspected (ft)	21,924	0	21,924
Smoke Tested (ft)	13,656	50,431	64,087
Smoke Tested (no. of locations)	1	0	1
Dye Water Flooded (no. of locations)	1	21	22
Manholes Inspected (no.)	348	0	348
Lines Repaired (no.)	98	124	222
MH Rehabbed (no.)	0	41	41
Force Mains (110 miles)			
Visual Surface Inspection (miles)	23.0	0.0	23.0
Repaired (no.)	0	2	2
Air Release Valves (251)			
Inspected/Maintained	103	0	103
Repaired (no.)	0	8	8
Pump & Lift Stations (259)			
Inspections (no.)	9,842	0	9,842
Wet wells cleaned	34	0	34
Repaired (no.)	0	1	1
Peak Flow Storage Facilities (2)			
Little Peak site visits	38	0	38
Big Peak site visits	38	0	38

Routine Maintenance-Day to day maintenance work or operational activities carried out on a regular basis, to keep the collection system operating properly. Generally routine maintenance consists of visual, mechanical, electrical, and electronic checks to ensure proper functioning of equipment. Routine maintenance also consists of sewer cleaning, smoke testing, dye water flooding, manhole inspection, and CCTV inspection.

Corrective Maintenance-Maintenance which is required to restore an item to a specified working order/condition, normally initiated as a result of a scheduled or routine inspection. Generally corrective maintenance consists of rehabilitation of gravity lines, manholes, force mains, etc. and generally in conjunction with system inspection activities. Corrective maintenance also consists of repairing or replacing a failed structure such as a pump station or storage facility.

Part C:
Sanitary Sewer Overflow
Response Plan (SSORP)

Baton Rouge Consent Decree Quarterly Report Part C - Sanitary Sewer Overflow Response Plan (SSORP)

Requirement: Pursuant to Paragraph 24, Section X of the Consent Decree, The City/Parish shall implement the Sanitary Sewer Overflow Response Plan (SSO Response Plan) attached to the Consent Decree as Exhibit A.

Summary of Activities

A total of 90 Sanitary Sewer Overflows (SSOs) were responded to during this reporting period. The Sanitary Sewer Overflow Monitoring Report, included as Part D Reporting of Unauthorized Discharges of this Quarterly Report, provides details about these overflows – including the response action taken. The Sanitary Sewer Overflow Response Plan was followed for each unauthorized discharge reported. There were no problems encountered in following the SSO Response Plan. The City/Parish was in compliance with the Collection System Preventive Maintenance Program.

The City/Parish submitted a request for modifications to the Sanitary Sewer Overflow Response Plan (SSORP) during this quarter (see attached correspondence). The SSORP contains modifications to the overflow response procedures, regulatory agency notification plan, and the general forms.

Summary of Unauthorized Discharges	Number
North Plant-LA0036439 AI# 4843 Collection System	22
Central Plant-LA0036421 AI # 4842 Collection System	31
South Plant-LA0036412 AI# 4841 Collection System	37
Total	90

** See table attached to Part D – Reporting of Unauthorized Discharges for detailed information about individual events.

The City/Parish [is] [is not] in compliance with Section X Sanitary Sewer Overflow Response Plan (SSORP) for the period 4 / 01 / 04 to 6 / 30 / 04. If not, see comments above.

BRSSO 4.1
BRSSO 4.10



Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, Louisiana
70821

June 30, 2004

PROJECT

Chief,
NPDES Compliance Monitoring Section (6EN-WC)
Water Enforcement Branch
Compliance Assurance and Enforcement Division
United States Environmental Protection Agency - Region VI
1445 Ross Avenue
Dallas, TX 75202

**Re: Baton Rouge City/Parish Consent Decree
 Civil Action No. 01-978-B-M3
 Revised Sanitary Sewer Overflow Response Plan**

Attention: Vivian Hare

The City of Baton Rouge / Parish of East Baton Rouge is submitting herewith a request for modification of the SSO Response Plan as referenced by Section X Paragraph 24 of the subject Consent Decree.

In accordance with Section 7.2 of the current SSO Response Plan, an annual review was performed to review all overflow response procedures. A workshop was held with all managers and key personnel to review established response activities and discuss suggestions for new or revised procedures. Based on the annual review and the results of the workshop, the following modification to the SSO Response Plan are recommended.

- Streamline overflow response procedures for pump station overflows/bypasses to promote better efficiency.
- Modify regulatory agency notification procedures to incorporate the new Single Point of Contact (SPOC) procedures.
- Revise, combine and eliminate certain reporting forms to prevent duplication and simplify the overflow reporting process.

These changes have been incorporated in a revised version of the SSORP. With this letter we are requesting approval of the attached revised SSO Response Plan dated June 2004. If you should have questions or require additional information please do not hesitate to call.

I certify under penalty of law that this document and all attachments were prepared under my direction and supervision in accordance with a system designed to assure

Chief, Water Enforcement Branch (6EN-W), U.S. E.P.A.

June 30, 2004

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that qualified personnel properly gather and evaluate the information submitted. Based upon my inquiry of either the person or persons who manage the system and/or the person or persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I further certify, to the best of my knowledge and belief, that this document is consistent with the applicable requirements of the Consent Decree entered among the United States, the State of Louisiana, the City of Baton Rouge, and the Parish of East Baton Rouge in the matter of United States v. Baton Rouge, Civil Action No. 01-978-B-M3, (M.D. La.). I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,



Fred E. Raiford III
Director

Attachments

cc: Honorable Bobby Simpson, Mayor-President (w/out attachments)
Mr. Paul Thompson, Chief Administrative Officer (w/out attachments)
Chief, Environmental Enforcement Section, US DOJ
Mr. Bruce Hammatt, LDEQ
Ms. Peggy Hatch, LDEQ
Ms. Mona Bates, US EPA Region 6
Mr. Carlos Zequeira, (6RC-EA)
Mr. Jim Thompson, Parish Attorney
Ms. Irys Allgood, Parish Attorney
Mr. Jerome M. Klier, DPW
Mr. Jeff Broussard, DPW Engineering
Mr. Kent Mudd, DPW Sewer Operations General Administration
Mr. Richard Wright, DPW Sewer Operations General Administration
Mr. Mark Leblanc, DPW
Mr. Robert Groht, DPW WWT
Mr. David Ratcliff, DPW WWC
Mr. Bill McHie, MWH

SANITARY SEWER OVERFLOW

RESPONSE PLAN



AUGUST 2000

Asset

Revised June 2004

Management

Program



EBROSCO

Part D:
Reporting of
Unauthorized Discharges

Baton Rouge Consent Decree Quarterly Report Part D - Reporting of Unauthorized Discharges

Requirement: Pursuant to Paragraph 26, Section XI of the Consent Decree the City/Parish shall report all Unauthorized Discharges of which it becomes aware to EPA and LDEQ. All such Unauthorized Discharges shall be reported to EPA and LDEQ in the Quarterly Report.

Summary of Unauthorized Discharges

The attached Sanitary Sewer Overflow Monitoring Report provides information about all unauthorized discharges discovered during the reporting period, such as the date, location, cause, action taken to reduce or eliminate the discharge, surface water which received the discharge and quantity of the discharge. The attached Sanitary Sewer Overflow Monitoring Report also identifies the steps taken to prevent the recurrence of the discharge.

Summary of Unauthorized Discharges	Number
North Plant-LA0036439 AI# 4843 Collection System	22
Central Plant-LA0036421 AI # 4842 Collection System	31
South Plant-LA0036412 AI# 4841 Collection System	37
Total	90

** See attached tables for detailed information about individual events.

During this quarter, the Louisiana Office of State Climatology (LOSC) indicated the Baton Rouge area received 29.5 inches of rain. This rainfall amount represents 50% of the Average Annual Rainfall for the Baton Rouge area. During the month of April, 89% of the rainfall (7.5 inches) fell in the last week. During the month of May and June, more than double the Average Monthly Rainfall (4.9 and 4.4 inches respectively) fell during each month (10.6 and 10.4 inches respectively). When compared to Average Monthly Rainfall, the Baton Rouge area received an excess of 14.6 inches of rain during this quarter.

Due to this unusually wet quarter, two unauthorized discharges greater than 100,000 gallons occurred in April, seven unauthorized discharges greater than 100,000 gallons occurred in May, and six unauthorized discharges greater than 100,000 gallons occurred in June, one of which was solely due to a pump failure (see attached correspondence).

Two unauthorized discharges greater than 100,000 gallons, including one greater than one million gallons, were in the North Wastewater Treatment Plant (NWWTP) service area, seven were in the Central Wastewater Treatment Plant (CWWTP) service area and six in the South Wastewater Treatment Plant (SWWTP) service area.

Implementation of the Remedial Measures Action Plan (RMAP) projects will prevent the recurrence of unauthorized discharges due exclusively to wet weather events less than or equal to the modeled design storm.

The City/Parish [is] [is not] in compliance with Section XI Reporting of Unauthorized Discharges for the period 4/ 01 / 04 to 6 / 30 / 04. If not, see comments above.

**CITY OF BATON ROUGE/PARISH OF EAST BATON ROUGE
SANITARY SEWER OVERFLOW MONITORING REPORT
APRIL 2004 - JUNE 2004**

NORTH Sewer District Collection System

LPDES LA0036439 AI# 4843

1 of 6

Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH
1	4/7/2004 6168 CALION	OVERFLOW WAS CAUSED FROM PUMP STATION #35, MECHANICAL FAILURE.-MH#35-1	CALLED PUMP MECHANIC, WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	HURRICANE CREEK	100	035-00001	138	404	7.21
2	4/20/2004 6334 BRIDGEPORT	OVERFLOW FROM CLEANOUT WAS CAUSED FROM STOPPAGE IN COLLECTION LINE.	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	AMITE RIVER	500	200-00016	151	152	7.10
3	5/1/2004 11085 DEVALL	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS-MH#46-00062	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECT	COMITE RIVER	300	046-00062	NV	319	6.83
4	5/12/2004 11085 DEVALL	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS-MH#46-00062	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECT	COMITE RIVER	1,900,000	046-00062	29	27	6.53
5	5/12/2004 6650 CEDAR GROVE	OVERFLOW CAUSED FROM SURCHARGE SYSTEMMH#47-556	AREA WASHED DOWN, DEODORIZED & DISINFECTED	IMPLEMENT RMAP PROJECT	JONES BAYOU	13,400	047-00556	37	26	6.53
6	5/13/2004 965 ST IRMA LEE	OVERFLOW CAUSED FROM FORCE-MAIN DISCHARGE INTO MH#276-06. OILY SUBSTANCE WAS FOUND AROUND MH.	REPORTED DISCHARGE TO EPA- WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	INVESTIGATION OF POSSIBLE REASON.	N/A	300	276-00006	53	126	6.60
7	5/14/2004 11085 DEVALL	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS-MH#46-00062 1" ABOVE RING	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECT	N/A	540	046-00062	NV	105	6.79
8	5/14/2004 11085 DEVALL	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS-MH#46-00062	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECT	COMITE RIVER	300	046-00062	NV	105	6.79
9	5/14/2004 11115 DEVALL	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.- MH#46-62	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	N/A	300	046-00062	NV	105	6.79
10	5/13/2004 2915 TOPAZ	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE.MH#-49-137.	CLEANED COLLECTION LINE. WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	300	049-00137	79	227	6.97
11	6/6/2004 4365 CYPRESS	OVERFLOW CAUSED FROM PUMP STATION# 65 FAILURE. DISCHARGED 5" TO 7" ABOVE RING. MH COVER STILL ON MH	CALLED PUMP MECHANIC. WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE	CYPRESS BAYOU	145,800	065-00102	83	57	9.70
12	6/8/2004 3722 DONALDSON	OVERFLOW WAS CAUSED FROM STOPPAGE IN COLLECTION LINE. DISCHARGE OCCURRED FROM MH#55-89	WASHED DOWN AREA, DEODORIZED AND DISINFECTED. HAVING LINE SEGMENT INSPECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	70	055-00089	94	99	6.92
13	6/13/2004 11535 ST LAWRENCE	OVERFLOW WAS CAUSED FROM STOPPAGE IN COLLECTION LINE.MH#45-243	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	200	045-00243	160	142	6.98
14	6/17/2004 11745 TROY	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE> MH45-116.	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	CYPRESS BAYOU	150	045-00116	135	132	6.85
15	6/24/2004 3722 DONALDSON	OVERFLOW WAS CAUSED FROM STOPPAGE IN COLLECTION LINE. DISCHARGE OCCURRED FROM MH#55-89	WASHED DOWN AREA, DEODORIZED AND DISINFECTED. HAVING LINE SEGMENT INSPECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	50	055-00089	52	200	6.64

NORTH Sewer District Collection System

LPDES LA0036439 AI# 4843

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Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH	
16	6/24/2004	4365 CYPRESS	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. MH COVER STILL ON MH# 65-102	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	CYPRESS BAYOU	19,900	065-00102	26	32	6.62
17	6/25/2004	GLEN OAKS	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. MH#47-555	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	HURRICANE CREEK	2,300	047-00555	26	106	6.69
18	6/25/2004	GLEN OAKS	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. MH#47-556	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	HURRICANE CREEK	60,500	047-00556	26	106	6.69
19	6/25/2004	4365 CYPRESS	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. MH COVER STILL ON MH	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	CYPRESS BAYOU	66,300	065-00102	26	22	6.75
20	6/25/2004	8357 MCCLELLAND	OVERFLOW WAS CAUSED FROM SURCHARGE CONDITIONS.	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	HURRICANE CREEK	50	047-00001	26	106	6.69
21	6/26/2004	15050 SCORPIO	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. MH # 155-1	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	HURRICANE CREEK	100	155-00001	37	172	6.63
22	6/28/2004	398 RAFF MAYER	OVERFLOW WAS CAUSED FROM STOPPAGE IN COLLECTION LINE. MH# 243-14	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	250	243-00014	64	326	6.74

CENTRAL Sewer District Collection System

LPDES LA0036421 AI# 4842

Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH	
23	04.25.04	2147 LAKESHORE	PUMP STATION #10-ELECTRICAL FAILURE; DISCHARGED FROM MH#10-1	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	UNIVERSITY LAKE	200	010-00001	95	398	7.24
24	4/26/2004	10132 AZROK	OVERFLOW CAUSED FROM PUMP STATION FAILURE-POWER OUTAGE-MH#88-52	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	WARD CREEK	500	088-00052	93	92	7.00
25	4/30/2004	2147 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#10-4903	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	123,000	010-04903	31	356	7.04
26	4/30/2004	3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	69,400	002-01390D	31	356	7.04
27	4/30/2004	3526 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390B	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	91,400	002-01390B	31	356	7.04
28	5/1/2004	2147 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#10-4903	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	24,000	010-04903	NV	204	6.96
29	5/1/2004	LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390A	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	32,600	002-01390A	NV	204	6.96
30	5/1/2004	3526 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390B	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	35,400	002-01390B	NV	204	6.96
31	5/1/2004	3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	20,100	002-01390D	NV	204	6.96

CENTRAL Sewer District Collection System

LPDES LA0036421 AI# 4842

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Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH
32	5/12/2004 3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	297,000	002-01390D	27	166	6.83
33	5/12/2004 2147 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#10-4903	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	422,000	010-04903	27	166	6.83
34	5/12/2004 3500 (blk) LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390A	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	320,500	002-01390A	27	166	6.83
35	5/12/2004 3526 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390B	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	330,000	002-01390B	27	166	6.83
36	5/14/2004 2147 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#10-4903	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	96,000	010-04903	NV	109	6.75
37	5/14/2004 3 RUE SORBONNE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.-MH# 6-4346D 1/2" ABOVE RING.	SET-UP BY-PASS, PUMPED SEWER OUT DITCH BACK INTO SYSTEM. WASHED DOWN AREA DEODORIZED, DISINFECTED.	IMPLEMENT RMAP PROJECT.	UNIVERSITY LAKE	8,400	006-04346D	NV	109	6.75
38	5/14/2004 3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	32,000	002-01390D	NV	109	6.75
39	5/14/2004 3 RUE SORBONNE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.-MH# 6-4346A 1/2" ABOVE RING.	BY-PASSED STATION TO REDUCE FLOW. WASHED DOWN AREA DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	UNIVERSITY LAKE	8,400	006-04346A	NV	109	6.75
40	5/14/2004 2999 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#2-1302	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	121,000	002-01302	NV	109	6.75
41	5/15/2004 3526 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390B	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	30,000	002-01390B	NV	130	6.80
42	5/15/2004 1330 STANFORD	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.-MH#02-1390A	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	UNIVERSITY LAKE	7,300	002-01390A	NV	130	6.80
43	5/15/2004 3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	14,400	002-01390D	NV	130	6.80
44	5/16/2004 3 RUE SORBONNE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.-MH# 6-4346A --1/2" ABOVE RING.	SET-UP BY-PASS, PUMPED SEWER OUT DITCH BACK INTO SYSTEM. WASHED DOWN AREA DEODORIZED, DISINFECTED.	IMPLEMENT RMAP PROJECT.	UNIVERSITY LAKE	500	006-04346A	38	116	6.89
45	5/18/2004 2443 RIVER ROAD	TWO TRICKLING FILTER PUMPS FAILED	PUMP CONTROL FIXED, OVERFLOW CEASED	N/A	N/A	90	CWWTP	NV	NV	NV
46	6/24/2004 3526 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390B	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	21,080	002-01390B	40	164	7.04
47	6/24/2004 3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	9,000	002-01390D	40	164	7.04

CENTRAL Sewer District Collection System

LPDES LA0036421 AI# 4842

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Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH
48	6/24/2004 2147 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#10-4903	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	24,000	010-04903	40	164	7.04
49	6/24/2004 1330 STANFORD	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.-MH#02-1390A	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	UNIVERSITY LAKE	9,000	002-01390A	40	164	7.04
50	6/25/2004 2147 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. DISCHARGED FROM MH#10-4903	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	UNIVERSITY LAKE	231,000	010-04903	26	177	7.08
51	6/25/2004 1330 STANFORD	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.-MH#02-1390A	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	UNIVERSITY LAKE	37,000	002-01390A	26	177	7.08
52	6/25/2004 3526 LAKESHORE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS.- MH# 2-1390B	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	DAWSON CREEK	79,000	002-01390B	26	177	7.08
53	6/25/2004 3556 LAKESHORE	OVERFLOW DUE TO SURCHARGING CONDITIONS FROM HEAVY RAINFALL.-MH-2-1390D	WASHED DOWN AREA, DEODORIZED AND DISINFECTED	IMPLEMENT RMAP PROJECTS.	UNIVERSITY LAKE	37,000	002-01390D	26	177	7.08

SOUTH Sewer District Collection System

LPDES LA0036412 AI#4841

Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH
54	4/3/2004 7030 RICHARDS	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE-SEWER LEAKED FROM BROKEN 18"GRAVITY MAIN.	SET-UP BYPASS PUMPING, REPAIRED BROKEN LINE, WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	WARD CREEK	800	058-00034	120	328	7.14
55	4/13/2004 15410 TIGER BEND	OVERFLOW WAS CAUSED FROM PUMP STATION #111 MECHANICAL FAILURE. DISCHARGED FROM MH#110-1 6" ABOVE MH	CONTAINED SEWER DISCHARGE, PUMPED SEWER BACK INTO SYSTEM, PUMPED FRESH WATER, WASHED AREA, DEODORIZED.	CONTINUE PREVENTIVE MAINTENANCE.	JONES CREEK	92,000	110-00001	177	192	6.80
56	4/28/2004 10051 GREAT SMOKEY	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE. MH#16-35	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	300	016-00035	153	196	7.23
57	4/30/2004 1423 ASHBOURNE	SURCHARGE CONDITIONS DUE TO HEAVY RAINS-MH#50-530	MONITORED AREA, DEODORIZED & DISINFECTED	WILL IMPLEMENT RMAP PROJECTS	WARD CREEK	103,000	050-00530	72	416	6.94
58	4/30/2004 1423 SHERWOOD FOREST	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH-50-528	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	JONES CREEK	40,900	050-00528	72	416	6.94
59	4/30/2004 11378 ASHBOURNE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH#50-526	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	JONES CREEK	15,400	050-00526	72	416	6.94
60	5/1/2004 1423 ASHBOURNE	SURCHARGE CONDITIONS DUE TO HEAVY RAINS-MH#50-530	MONITORED AREA, DEODORIZED & DISINFECTED	WILL IMPLEMENT RMAP PROJECTS	WARD CREEK	1,300	050-00530	78	232	6.90
61	5/1/2004 1423 SHERWOOD FOREST	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH-50-528	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	JONES CREEK	770	050-00528	78	232	6.90
62	5/1/2004 11378 ASHBOURNE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH#50-526	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	JONES CREEK	580	050-00526	78	232	6.90

SOUTH Sewer District Collection System

LPDES_LA0036412 AI#4841

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Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH
63	5/2/2004 15410 TIGER BEND	OVERFLOW WAS CAUSED FROM PUMP STATION #111 ELECTRICAL FAILURE. DISCHARGED FROM MH#110-1 6" ABOVE MH	CONTAINED SEWER DISCHARGE, PUMPED SEWER BACK INTO SYSTEM, PUMPED FRESH WATER, WASHED AREA, DEODORIZED.	CONTINUE PREVENTIVE MAINTENANCE.	JONES CREEK	93,000	110-00001	70	78	7.10
64	5/6/2004 14376 TIGER BEND	OVERFLOW WAS CAUSED FROM STOPPAGE IN COLLECTION LINE, OVERFLOWED FROM BREAK IN LINE.	INSPECTED AND SCHEDULED FOR REPAIR. WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	CLAYCUT BAYOU	2,000	170-00010	155	179	7.09
65	5/12/2004 1423 ASHBOURNE	SURCHARGE CONDITIONS DUE TO HEAVY RAINS-MH#50-530	MONITORED AREA, DEODORIZED & DISINFECTED	WILL IMPLEMENT RMAP PROJECTS	WARD CREEK	85,600	050-00530	67	524	7.03
66	5/12/2004 1423 SHERWOOD FOREST	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH-50-528	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	JONES CREEK	24,700	050-00528	67	524	7.03
67	5/12/2004 11378 ASHBOURNE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH#50-526	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	JONES CREEK	129,000	050-00526	67	524	7.03
68	5/12/2004 17530 BROOKFIELD	OVERFLOW CAUSED FROM PS#676 FAILURE DUE TO HEAVY RAINFALL. MH#365-10 (2" ABOVE MH)	PUMP MECHANIC WAS CALLED. WASHED AREA WITH DISINFECTANT	CONTINUE PREVENTIVE MAINTENANCE.	N/A	7,700	365-00010	126	350	7.21
69	5/14/2004 17341 BROOKFIELD	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.-MH# 365-00010	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	N/A	300	365-00010	58	220	7.28
70	5/14/2004 7955 PERKINS	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. LINE.-MH#57-357 1" ABOVE RING	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	WARD CREEK	1,500	057-00357	35	298	7.33
71	5/15/2004 1423 SHERWOOD FOREST	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH-50-528	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	JONES CREEK	2,200	050-00528	24	118	6.67
72	5/15/2004 1388 ASHBOURNE	MANHOLE OVERFLOWED DUE TO SURCHARGE CONDITIONS CAUSED BY HEAVY RAIN EVENT-MH#50-530	MONITORED AREA, DEODORIZED & DISINFECTED	IMPLEMENT RMAP PROJECTS.	JONES CREEK	1,800	050-00530	24	118	6.67
73	5/15/2004 11378 ASHBOURNE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH#50-526	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	JONES CREEK	54,000	050-00526	24	118	6.67
74	5/17/2004 764 PLANTATION RIDGE	OVERFLOW CAUSED FROM SURCHARGED CONDITIONS. MH#161-108	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	N/A	300	161-00108	79	280	7.02
75	5/26/2004 722 SEYBURN	OVERFLOW CAUSED FROM PS #53 POWER FAILURE, DISCHARGED FROM MH#53-7-	SET-UP BYPASS AND PUMPED SEWER FROM CANAL BACK INTO SYSTEM, WASHED AREA, DEODORIZED, AND DISINFECTED.	NONE	DAWSON CREEK	1,000	053-00007	144	179	7.23
76	6/2/2004 9940 GREAT SMOKEY	OVERFLOW CAUSED FROM WET WEATHER CONDITIONS	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECTS	HURRICANE CREEK	40	051-00194	93	204	7.25
77	6/6/2004 1031 LEE	OVERFLOW WAS CAUSED FROM PS 305 FAILURE.	CONTACTED PUMP MECHANIC/WASHED DOWN AREA, DEODORIZED, AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	N/A	40	305-00001	128	191	6.51

SOUTH Sewer District Collection System

LPDES LA0036412 AI#4841

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Date	Address	Cause	Action	Prevention	Rec. Waters	Amt. Gals	PS	BOD	TSS	pH	
78	6/8/2004	FOX HUNT	OVERFLOW WAS CAUSED FROM PS #407 FAILURE. DISCHARGE OCCURRED FROM MH#407-2.	CALLED PUMP MECHANIC. WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	AMITE RIVER	1,000	407-00002	134	156	6.97
79	6/11/2004	3482 DRUSILLA	OVERFLOWING CLEANOUT WAS CAUSED FROM STOPPAGE IN COLLECTION LINE.	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	30	058-01579	164	164	7.19
80	6/15/2004	11036 BLACK OAK	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE-MH50-337	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	JONES CREEK	50	050-00377	156	165	6.98
81	6/16/2004	15946 HARRELLS FERRY	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE. MH#283-13.	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	100	283-00013	124	208	6.78
82	6/22/2004	3163 MARYDON	OVERFLOW WAS CAUSED FROM STOPPAGE IN COLLECTION LINE. MH#51-265	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	100	051-00265	122	252	7.22
83	6/23/2004	9940 GREAT SMOKEY	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE. MH#51-19A	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	HURRICANE CREEK	100	051-00019	116	170	7.09
84	6/24/2004	3231 MYRTLE GROVE	OVERFLOW CAUSED FROM STOPPAGE IN COLLECTION LINE.	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE/MONITOR FOR RECURRENCE.	N/A	25	057-05075	121	196	6.97
85	6/25/2004	1423 SHERWOOD FOREST	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH-50-528	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	JONES CREEK	274,000	050-00528	46	280	6.88
86	6/25/2004	11378 ASHBOURNE	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.MH#50-526	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	JONES CREEK	185,000	050-00526	46	280	6.88
87	6/25/2004	1388 SHERWOOD FOREST	MANHOLE OVERFLOWING DUE TO SURCHARGE CONDITIONS CAUSED BY HEAVY RAIN EVENT-MH#50-530A	MONITORED AREA, DEODORIZED & DISINFECTED	IMPLEMENT RMAP PROJECTS	JONES CREEK	126,400	050-00530A	46	280	6.88
88	6/25/2004	1424 SHERWOOD FOREST	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS. MH# 50-530	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT	JONES CREEK	242,000	050-00530	46	280	6.88
89	6/25/2004	17514 BROOKFIELD	OVERFLOW CAUSED FROM SURCHARGE CONDITIONS.-MH# 365-00010	WASHED DOWN AREA, DEODORIZED AND DISINFECTED.	IMPLEMENT RMAP PROJECT.	N/A	21,800	365-00010	69	247	6.93
90	6/30/2004	11148 CLOVERLAND	OVERFLOW WAS CAUSED FROM PS 252 FAILURE. MH# 252-39 DISCHARGED.	CONTAINED SEWER IN CANAL, PUMPED BACK INTO SEWER SYSTEM. WASHED AREA, DEODORIZED AND DISINFECTED.	CONTINUE PREVENTIVE MAINTENANCE.	CLAYCUT BAYOU	500	252-00039	82	130	7.13



Department of Public Works
Wastewater Collection Division

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

May 6, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036421 AI#4842
2147 Lakeshore Overflow - PS 10 Area


Dear Ms. Hare:

This letter is to provide information about an overflow at 2147 Lakeshore (Manhole 010-04903), which occurred from approximately 8:00 a.m. to 10:30 p.m. on April 30, 2004. During this time, an estimated 123,000 gallons of untreated sewage was released to University Lake.

The overflow was due to a heavy rainfall event, which consisted of approximately 3.3 inches of rain. Remedial measures action plan (RMAP) projects are being implemented to prevent recurrence of similar future overflows in this area due to wet-weather events. Procedures outlined in the SSO Response Plan were followed during the incident.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works
Wastewater Collection Division

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

May 6, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036412 AI#4841
1423 Ashbourne Overflow - PS 50 Area


Dear Ms. Hare:

This letter is to provide information about an overflow at 1423 Ashbourne (Manhole 050-00530), which occurred from approximately 10:00 a.m. to 10:30 p.m. on April 30, 2004. During this time, an estimated 103,000 gallons of untreated sewage was released to Ward Creek.

The overflow was due to a heavy rainfall event, which consisted of approximately 3.3 inches of rain. Remedial measures action plan (RMAP) projects are being implemented to prevent recurrence of similar future overflows in this area due to wet-weather events. Procedures outlined in the SSO Response Plan were followed during the incident.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works
Wastewater Collection Division

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

May 17, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036421 AI#4842
2147 Lakeshore Overflow - PS 10 Area

Dear Ms. Hare:

This letter is to provide information about an overflow at 2147 Lakeshore (Manhole 010-04903), which occurred from approximately 7:30 a.m. on May 12, 2004 to 1:30 a.m. on May 13, 2004. During this time, an estimated 422,000 gallons of untreated sewage was released to University Lake.

The overflow was due to a heavy rainfall event, which consisted of approximately 5-6 inches of rain over a 12-hour period. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial measures action plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,

Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
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Department of Public Works
Wastewater Collection Division

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

May 17, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036421 AI#4842
PS 2 Area Overflows

Dear Ms. Hare:

This letter is to inform you of three overflows, which occurred in the PS 2 area between May 12, 2004 and May 13, 2004. During this time, an estimated total of 650,500 gallons of untreated sewage was released to Dawson Creek and 297,000 gallons was released to University Lake. The overflows were due to a heavy rainfall event. The following is a list of overflow quantities from specific overflow locations at specific times:

<u>Manhole #</u>	<u>Begin Time</u>	<u>End Time</u>	<u>Address</u>	<u>Quantity</u> <u>(gallons)</u>
002-01390A	May 12, 7:30 AM	May 13, 2:00 AM	3500 (blk) Lakeshore	320,500
002-01390B	May 12, 7:30 AM	May 13, 2:30 AM	3526 Lakeshore	330,000
002-01390D	May 12, 7:30 AM	May 13, 1:30 AM	3556 Lakeshore	297,000

The overflows were due to a heavy rainfall event, which consisted of approximately 5-6 inches of rain over a 12-hour period. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial measures action plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Grohl, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works
Wastewater Collection Division

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

May 17, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036412 AJ#4843
11378 Ashbourne Overflow - PS 50 Area

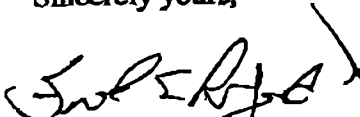
Dear Ms. Hare:

This letter is to inform you of an overflow at 11378 Ashbourne (Manhole 050-00526), which occurred from approximately 9 a.m. May 12, 2004 to 2:30 p.m. May 13. During this time, an estimated total of 129,000 gallons of untreated sewage was released to Jones Creek.

The overflow was due to a heavy rainfall event, which consisted of approximately 5-6 inches of rain over a 12-hour period. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial measures action plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford II
Director of Public Works

FER/DR/tkb

cc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Grobt, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works
Wastewater Collection Division

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

May 17, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036439 AH#4841
11085 Devall Overflow - PS 46 Area


Dear Ms. Hare:

This letter is to inform you of an overflow at 11085 Devall Ln. (Manhole 046-00062), which occurred from 7:30 a.m. to 7 p.m. May 12, 2004. During this time, a significant amount of untreated sewage was released to the Comite River. The total volume of sewage released has not been determined at this time. Investigation of this incident is ongoing and additional information will be provided in a follow-up letter as soon as it is available.

The overflow was due to a heavy rainfall event, which caused widespread flooding, major traffic problems and shut down several schools in the area. High water also flooded a number of businesses, homes and cars. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial Measures Action Plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford III
Director of Public Works

FER/DR/swm

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works
Wastewater Collection Division

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

May 20, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036439 AI#4841
11085 Devall Overflow - PS 46 Area


Dear Ms. Hare:

This letter is to inform you of an overflow at 11085 Devall Ln. (Manhole 046-00062), which occurred from approximately 7:30 a.m. to 7 p.m. May 12, 2004. During this time, an estimated 1,900,000 gallons of untreated sewage was released to the Comite River.

The overflow was due to a heavy rainfall event of approximately 5-6 inches of rain over a 12-hour period, which caused widespread flooding, major traffic problems and shut down several schools in the area. High water also flooded a number of businesses, homes and cars. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial Measures Action Plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Grolit, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works

Wastewater Collection Division

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

May 19, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036421 AI#4842
2999 Lakeshore Overflow - PS 2 Area

Dear Ms. Hare:

This letter is to inform you of an overflow at 2999 Lakeshore (Manhole 002-01302), which occurred from approximately 9:30 p.m. May 14, 2004 to 8:30 a.m. May 15, 2004. During this time, an estimated 121,000 gallons of untreated sewage was released to University Lake.

The overflows were due to a heavy rainfall event, which consisted of approximately 2-4 inches of rain over a 24-hour period. To compound the impact of the storm, the ground was already saturated from a large wet weather event a couple of days prior to this event. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial measures action plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,

Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



Department of Public Works

Wastewater Collection Division

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

June 9, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036439 AI#4843
4365 Cypress Overflow - PS 65 Area


Dear Ms. Hare:

This letter is to inform you of an overflow at 4365 Cypress (Manhole 065-00102); which occurred from approximately 5:00 p.m. to 8:30 p.m. June 6, 2004. During this time, an estimated 145,800 gallons of untreated sewage was released to Cypress Bayou.

This overflow was due to a pump failure at Pump Station #65. The pump mechanic was called, the repairs were made, and the area was washed down, deodorized and disinfected. Procedures outlined in the SSO Response Plan were followed during the incident.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,



Fred E. Raiford III
Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHie, MWH



CITY-PARISH DEPARTMENT OF PUBLIC WORKS
Wastewater Collection Division

City of Baton Rouge
 Parish of East Baton Rouge
 P.O. Box 1471
 Baton Rouge, LA 70821

June 30, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036412 AI#4841
 PS 50 Area Overflows

Dear Ms. Hare:

This letter is to inform you of four overflows, which occurred from four manholes in the PS 50 area from approximately 9:15 a.m. to 9:15 p.m. on June 25, 2004. During this time, an estimated total of 827,400 gallons of untreated sewage was released to Jones Creek. The following is a list of overflow quantities from specific overflow locations at specific times:

<u>Manhole #</u>	<u>Address</u>	<u>Quantity (gallons)</u>
050-00526	11378 Ashbourne	185,000
050-00530	1424 Sherwood Forest	242,000
050-00528	1423 Sherwood Forest	274,000
050-00530A	1388 Sherwood Forest	126,400

The overflows were due to a heavy rainfall event, which consisted of approximately two and a half inches of rain over a 9-hour period. To compound the impact of the storm, the ground was already saturated from a large wet weather event the previous week. Rainfall for the month of June is more than twice the average rainfall, based upon over 50 years rainfall data. Remedial measures action plan (RMAP) projects are being implemented to prevent recurrence of similar future overflows in this area due to wet-weather events. Procedures outlined in the SSO Response Plan were followed during the incident.

The overflow was due to a heavy rainfall event, which consisted of approximately 5-6 inches of rain over a 12-hour period. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial measures action plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,

Fer: [Handwritten Signature]
Fred E. Raiford III
Director of Public Works

FER/DR/tkb

- xc: Jerome M. Klier, Deputy Director of Public Works
- Kent Mudd, Special Projects Engineer
- Rick Wright, P.E.
- Robert Groht, Jr., Wastewater Treatment Plant Manager
- David Ratcliff, Wastewater Collection Systems Manager
- Michael Ponder, Parish Attorney
- Bill McHie, MWH



CITY-PARISH DEPARTMENT OF PUBLIC WORKS
Wastewater Collection Division

City of Baton Rouge
Parish of East Baton Rouge
P.O. Box 1471
Baton Rouge, LA 70821

June 30, 2004

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

Attention: Vivian Hare

Re: LPDES Permit No. LA0036421 AI#4842
2147 Lakeshore Overflow - PS 10 Area

Dear Ms. Hare:

This letter is to provide information about an overflow at 2147 Lakeshore (Manhole 010-04903), which occurred from approximately 10:00 a.m. to 6:00 p.m. on June 25, 2004. During this time, an estimated 231,000 gallons of untreated sewage was released to University Lake.

The overflow was due to a heavy rainfall event, which consisted of approximately two and a half inches of rain over a 9-hour period. To compound the impact of the storm, the ground was already saturated from a large wet weather event the previous week. Rainfall for the month of June is more than twice the average rainfall, based upon over 50 years rainfall data. Procedures outlined in the SSO Response Plan were followed during the incident. Remedial measures action plan (RMAP) projects are being implemented to reduce the recurrence of similar future overflows in this area due to wet-weather events.

Should you require additional information concerning this matter, please let me know.

Sincerely yours,


Fred E. Raiford III

Director of Public Works

FER/DR/tkb

xc: Jerome M. Klier, Deputy Director of Public Works
Kent Mudd, Special Projects Engineer
Rick Wright, P.E.
Robert Groht, Jr., Wastewater Treatment Plant Manager
David Ratcliff, Wastewater Collection Systems Manager
Michael Ponder, Parish Attorney
Bill McHic, MWH

Part E:
Supplemental Environmental
Projects (SEPs)

Baton Rouge Consent Decree Quarterly Report Part E - Supplemental Environmental Projects (SEPs)

Requirement: Pursuant to Section XX, Paragraph 60 of the Consent Decree, the City/Parish shall conduct Supplemental Environmental Projects (SEPs) in accordance with the SEP Plan Requirements. The SEPs will be completed in accordance with the schedule specified in the SEP Plan Requirement. Pursuant to Paragraph 61 of the Consent Decree, the City/Parish shall spend no less than \$1,125,000 on the SEPs. Pursuant to Paragraph 62 of the Consent Decree, the City/Parish shall complete the SEPs in accordance with the milestones contained in the SEP Plan Requirements and submit a SEP Completion Report no later than September 14, 2004. Pursuant to Paragraph 63 of the Consent Decree, the City/Parish will not be required to pay any additional civil penalty for not complying with Paragraph 61, if the City/Parish made good faith and timely efforts to complete the SEP project and can certify that at least 90% of the SEP money was spent.

Summary

The City/Parish estimates that when the SEPs are completed approximately 750 residences will have their effluent treated at a wastewater treatment plant and discharged into the Mississippi River. Cypress Bayou, Lively Bayou, Claycut Bayou and the Amite and Comite Rivers will avoid untreated sewer discharges from these 750 residences.

The Notice to Proceed has been issued for all SEP projects, and construction is complete or underway for all SEP projects. We anticipate that all SEP projects will be completed ahead of the schedule contained in the SEP Plan Requirements. We do not anticipate any noncompliance.

The following are the Supplemental Environmental Projects (SEPs):

1. Donwood/Oak Manor Project
2. Pleasant Hills (Section 3)/Green Acres Project
3. Sharon Hills/Cedar Glen/Pleasant Hills Project
4. Stumberg Lane Project

Summary of Activities

The Donwood/Oak Manor Project construction was completed on September 4, 2003, 190 days prior to the Consent Decree construction completion milestone. The Metropolitan Council issued the Certificate of Final Acceptance on October 22, 2003. The City/Parish distributed a letter to area property owners informing them of their obligation to abandon their septic tank, back fill it with sand and make sure their service line is properly connected to the City-Parish collection line within six months following the official notification letter, January 8, 2004. The area property owners can choose to perform the work themselves or contract a licensed plumber of their choosing.

The Pleasant Hills (Section 3)/Green Acres Project construction was completed on June 7, 2004, 7 days prior to the Consent Decree construction completion milestone. Once the work was completed,

Part E – Supplemental Environmental Projects (SEPs)

the contractor requested acceptance, and the work was inspected and recommended for acceptance by DPW and the design engineer (see attachments). The Metropolitan Council issued a Resolution for Acceptance on June 23, 2004.

Construction for the Sharon Hills/Cedar Glen/Pleasant Hills Project is ongoing and is anticipated to be complete by August 1, 2004, 13 days prior to the Consent Decree construction completion milestone.

The Stumberg Lane Project construction was completed on September 15, 2003, 181 days prior to the Consent Decree construction completion milestone. The Metropolitan Council issued the Certificate of Final Acceptance on November 25, 2003. The City/Parish distributed a letter to area property owners informing them of their obligation to abandon their septic tank, back fill it with sand and make sure their service line is properly connected to the City-Parish collection line within six months following the official notification letter, January 8, 2004. The area property owners can choose to perform the work themselves or contract a licensed plumber of their choosing.

Status of Supplemental Environmental Projects (SEPs)

Proj. No.	Design Status	Construction Start Date			Construction Completion Date		Construction % Complete	Construction Cost	
		Sched.	Advertised	NTP	CD Sched.	Anticipated / Completion		CD Estimate	Contract Amount
1	100%	03/14/03	02/21/03	04/28/03	03/14/04	09/04/03	100%	\$ 125,000	\$ 265,595
2	100%	06/14/03	06/27/03	09/24/03	06/14/04	06/07/04	100%	\$ 250,000	\$ 749,103
3	100%	06/14/03	06/27/03	09/24/03	08/14/04	08/01/04	90%	\$ 650,000	
4	100%	03/14/03	03/28/03	06/18/03	03/14/04	09/15/03	100%	\$ 100,000	\$ 80,367
Total								\$1,125,000	\$1,094,660

1. Donwood/Oak Manor Project
2. Pleasant Hills (Section 3)/Green Acres Project
3. Sharon Hills/Cedar Glen/Pleasant Hills Project
4. Stumberg Lane Project

The City/Parish [is] [is not] in compliance with Section XX Supplemental Environmental Projects for the period 04 / 01 / 04 to 06 / 30 / 04. If not, see comments above.

Baton Rouge Consent Decree Quarterly Report Part F - Consent Decree Compliance Status

Requirement: Pursuant to Exhibit I of the Consent Decree, the City/Parish shall report Consent Decree compliance status in each quarterly report and provide a brief narrative summary of non-compliance items and any other information required to convey activity status as it relates to compliance or non-compliance with the Consent Decree.

Compliance Status

1. The City/Parish was not in compliance with the North Treatment Plant LPDES Permit No. LA0036439 AI# 4843 during the reporting period. The North Wastewater Treatment Plant (NWWTP) exceeded the permit effluent limits for the monthly average of BOD & TSS (mg/l) and the weekly average of Fecal Coliform, for the periods shown in the table below. The total amount of stipulated penalties identified for non-compliant activities at the North Plant during this reporting period is \$6,000. Noncompliance is not anticipated during subsequent reporting periods.

NWWTP	Permit Level	2 nd Quarter 2004			Stipulated Penalty		
		Apr.	May	Jun.	# of Occurrences	Per Occurrence	Total
<u>BOD</u>							
7-Day Avg. (mg/l)	45	C	C	C			
Monthly Avg. (mg/l)	30	32	C	C	1	\$2,500	\$2,500
Monthly Avg. (lbs/day)	13,511	C	C	C			
Percent Removal	75%	C	C	C			
<u>TSS</u>							
7-Day Avg. (mg/l)	45	C	C	C			
Monthly Avg. (mg/l)	30	32	C	C	1	\$2,500	\$2,500
Monthly Avg. (lbs/day)	13,511	C	C	C			
Percent Removal	75%	C	C	C			
<u>TRC</u>							
Daily Avg (mg/l)	0.46	C	C	C			
<u>Fecal Coliform</u>							
7-Day Avg. (mg/l)	400 col/100ml	C	1081	C	1	\$1,000	\$1,000
Monthly Avg. (mg/l)	200 col/100ml	C	C	C			
Total							\$6,000

C-Compliance



Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, Louisiana
70821

BRSSO 4.1
BRSSO 4.11

PROJECT

June 25, 2004

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: Baton Rouge Consent Decree
Civil Action No. 01-978-B-M3
Supplemental Environmental Project (SEP) No. 2**

Attention: Vivian Hare

This letter is to notify you that construction for the Pleasant Hills/Green Acres SEP Project (01-SEP-02) was completed on June 7, 2004, 7 days prior to the Consent Decree construction completion milestone date of June 14, 2004. A copy of the EBROSCO Resolution for Acceptance is attached.

This project and the Sharon Hills/Cedar Glen/Pleasant Hills SEP project (01-SEP-03) were combined into one construction project and awarded by the Metropolitan Council on August 13, 2003. Once the work in connection with 01-SEP-02 (Pump Station No. 313 area) was completed, the contractor requested Partial Acceptance, and the work was inspected and recommended for acceptance by DPW and the design engineer (see attachments).

The total construction contract amount for both projects is \$749,103. The amount for this portion of the project (01-SEP-02) was \$180,840, which increases the total construction cost for all Supplemental Environmental Projects to \$526,802.

I certify that the information contained in or accompanying this SEP completion notification 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.

If you have any questions or if we can provide any additional information, please don't hesitate to contact me.

Sincerely,



Fred E. Raiford III
Director

Attachments

cc: Honorable Bobby Simpson, Mayor-President (w/out attachments)
Mr. Paul Thompson, Chief Administrative Officer (w/out attachments)
Chief, Environmental Enforcement Section, US DOJ
Mr. Bruce Hammatt, LDEQ
Ms. Peggy Hatch, LDEQ
Ms. Mona Bates, US EPA Region 6
Mr. Carlos Zequeira, (6RC-EA)
Mr. Jim Thompson, Parish Attorney
Ms. Irys Allgood, Parish Attorney
Mr. Jerome M. Klier, DPW
Mr. Jeff Broussard, DPW Engineering
Mr. Kent Mudd, DPW Sewer Operations General Administration
Mr. Richard Wright, DPW Sewer Operations General Administration
Mr. Mark Leblanc, DPW
Mr. Robert Groht, DPW WWT
Mr. David Ratcliff, DPW WWC
Mr. Bill McHie, MWH

ADOPTED
EAST BATON ROUGE SEWAGE
COMMISSION

JUN 23 2004

Brian Maynard

REVISED COUNCIL ADMINISTRATOR TREASURER

749

RESOLUTION 43381

EBROSCO RESOLUTION 7357

ADOPTED
METROPOLITAN COUNCIL

JUN 23 2004

Brian Maynard

COUNCIL ADMINISTRATOR TREASURER

PARTIAL ACCEPTANCE OF PUMP STATION NUMBER 313, FOR WORK DONE BY ALLEN & LEBLANC, LLC, UNDER THE CONTRACT FOR THE SHARON HILLS/CEDAR GLEN/PLEASANT HILLS/GREEN ACRES SUPPLEMENTAL ENVIRONMENTAL PROJECT, BEING PROJECT NO. 01-SEP-02, ALL IN ACCORDANCE WITH SECTION 5-14.1 OF THE STANDARD SPECIFICATIONS FOR PUBLIC WORKS CONSTRUCTION.

WHEREAS, the contract for the construction of Pump Station No. 313 in connection with the Sharon Hills/Cedar Glen/Pleasant Hills/Green Acres Supplemental Environmental Project (SEP), being Project No. 01-SEP-02, was awarded to Allen & LeBlanc, LLC by the Metropolitan Council on August 13, 2003; and

WHEREAS the Director of Public Works and the Capital Improvements Committee have officially advised this Council that Pump Station No. 313 was certified by the project engineer, on June 30, 2004, as being ready for its intended use and is fully operational under the said contract in accordance with the plans and specifications therefor, and have recommended the partial acceptance of such contract:

NOW, THEREFORE, BE IT RESOLVED by the Metropolitan Council of the Parish of East Baton Rouge and City of Baton Rouge and by the Board of Commissioners of the East Baton Rouge Sewerage Commission (EBROSCO), acting as the Authority for EBROSCO, that:

Section 1. Partial acceptance of work done by Allen & LeBlanc, LLC under the contract for the construction of Pump Station No. 313 in connection with the Sharon Hills/Cedar Glen/Green Acres Sewer Upgrades Project, Project No. 01-SEP-02, Purchase Order Nol. P0031183, is hereby partially accepted in the names of the City of Baton Rouge and Parish of East Baton Rouge and of this Council, a formal instrument evidencing this partial acceptance of the said contract, all in accordance with Section 5-14.1 of the Standard Specifications for Public Works construction.

Allen LeBlanc

P.O. BOX 15789
BATON ROUGE, LA 70895
(225) 272 4599

May 17, 2004

Mr. Kent Mudd
City-Parish Wastewater Collections
329 Chippewa Street
Baton Rouge, LA 70805

RE: Sharon Hills/Cedar Glen/Pleasant Hills/Green Acres
Supplemental Environmental Project
Contract No. 01-SEP-02

Dear Mr. Mudd:

We are requesting Partial Acceptance (as per Section 5-14.1 of the Standard Specifications for Public Works Construction) be granted for all portions of work associated with Pump Station 313. The system is in service and the Pump Station has been accepted by the appropriate personnel (see memo attached dated 4/28/04). All we have remaining is some housekeeping items. Due to the abnormally wet May we have had, progress on these items has been all but stymied.

Should additional information be required, please contact the office listed above.

Sincerely,

Paul A. Johnson
Project Manager

PJ

REGIONAL OFFICES

HOUSTON, TX
PH (281) 397-9016
FAX (281) 397-6637

NEW ORLEANS, LA
PH (504) 561-6599
FAX (504) 561-6581

SHREVEPORT, LA
PH (318) 797-8636
FAX (318) 798-0478

LAKE CHARLES, LA
PH (337) 439-8699
FAX (337) 439-3337

BILCOI, MS
PH (228) 365-5990
FAX (228) 392-9743

June 7, 2004

Mr. Kent Mudd, P.E.
Department of Public Works
City of Baton Rouge/Parish of East Baton Rouge
Sewer Operations General Administration Division
329 Chippewa Street
Baton Rouge, LA 70805-7686

**Re: Sharon Hills/Cedar Glen/Pleasant Hills/Green Acres
Supplemental Environmental Project
Partial Acceptance Pump Station 313
Contract No. 01-SEP-02**

Dear Mr. Mudd:

As per Section 5-14.1 of the Standard Specifications for Public Works Construction, Allen and Leblanc is hereby requesting Partial Acceptance of all portions of work associated with Pump Station 313.

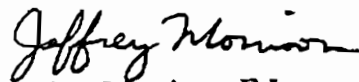
In accordance with this specification above and concurrence from EBR Parish Sewer Department, Pump Station 313 has been inspected and has completed the 24-hour test with no alarm or failures.

On behalf of C-K Associates, LLC, we are in agreement with EBR Parish Sewer Department and therefore recommend Partial Acceptance of Pump Station 313. Some housekeeping items remain and will be addressed by the contractor.

If you have any questions or require any additional information, please do not hesitate to contact me at (225) 755-1000 or Brant B. Richard, P.E. at (225) 987-7086.

Sincerely,

C-K Associates, LLC


Jeffrey Morrison, E.I.
Assistant Project Manager

Part F:
Consent Decree
Compliance Status

Part F - Consent Decree Compliance Status

2. The City/Parish was not in compliance with the South Treatment Plant LPDES Permit No. LA0036412 AI# 4841 during the reporting period. The South Wastewater Treatment Plant (SWWTP) exceeded the permit effluent limits for monthly average for BOD & TSS (mg/l) and 75% removal of BOD, for the periods shown in the table below. The total amount of stipulated penalties identified for non-compliant activities at the South Plant during this reporting period is \$11,000.

The SWWTP completed the following tasks during this reporting period. Trickling filters No. 6 & 8 completed start-up in April, as anticipated, and the filters are functioning properly. Also, the piping for the snail screens was installed and the snail screens are operational. Noncompliance is not anticipated during subsequent reporting periods.

SWWTP	Permit Level	2 nd Quarter 2004			Stipulated Penalty		
		Apr.	May	Jun.	# of Occurrences	Per Occurrence	Total
BOD							
7-Day Avg. (mg/l)	45	C	C	C			
Monthly Avg. (mg/l)	30	32	C	38	2	\$2,500	\$5,000
Monthly Avg. (lbs/day)	13,511	C	C	C			
Percent Removal	75%	C	C	68	1	\$2,500	\$2,500
TSS							
7-Day Avg. (mg/l)	45	C	C	C			
Monthly Avg. (mg/l)	30	C	C	32	1	\$2,500	\$2,500
Monthly Avg. (lbs/day)	13,511	C	C	C			
Percent Removal	75%	C	C	C			
TRC							
Daily Avg (mg/l)	0.46	C	C	C			
Fecal Coliform							
7-Day Avg. (mg/l)	400 col/100ml	5910	C	C	1	\$1,000	\$1,000
Monthly Avg. (mg/l)	200 col/100ml	C	C	C			
Total							\$11,000

C-Compliance

3. One unauthorized discharge occurred in the North Wastewater Treatment Plant (NWWTP) area and resulted in the release of more than one million gallons during the entire duration, as noted in Part D Reporting of Unauthorized Discharges. The stipulated penalty identified for this unauthorized discharge in the NWWTP area is \$5,000 for the period shown in the table below.

Part F - Consent Decree Compliance Status

Unauthorized Discharges (>1M gal.)	2nd Quarter 2004			Stipulated Penalty		
	<u>Apr.</u>	<u>May</u>	<u>Jun.</u>	<u># of Occurrences</u>	<u>Per Occurrence</u>	<u>Total</u>
North Plant-LA0036439	C	1.9M	C	1	\$5,000	\$5,000
Central Plant-LA0036421	C	C	C			
South Plant-LA0036412	C	C	C			
Total						\$5,000

C-Compliance

Summary of Activities

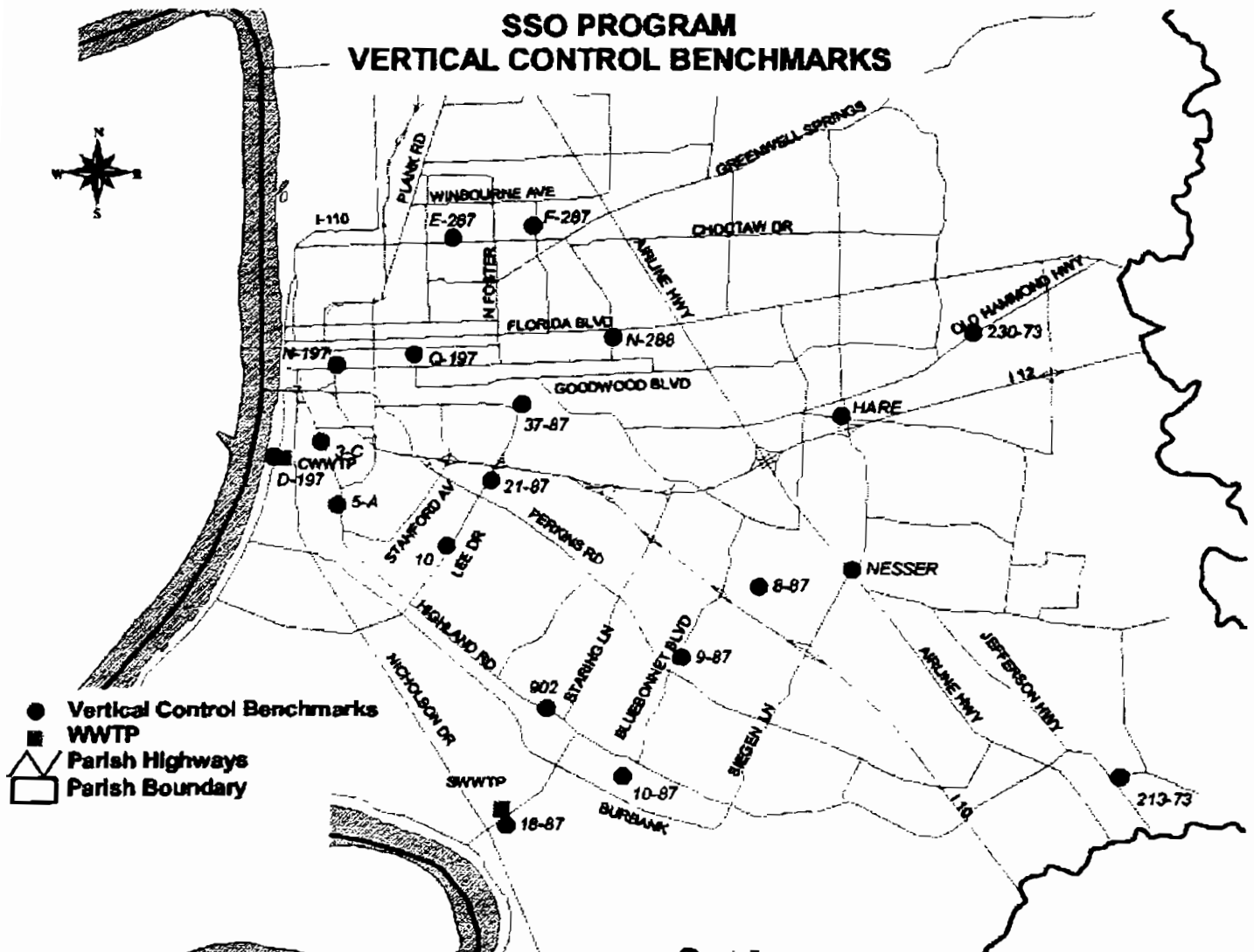
1. A design engineer was selected and a contract was negotiated and approved by Metropolitan Council, for Project 04-RMP-SBFS the South WWTP Ballasted Flocculation Treatment System. Design is anticipated to begin during the next quarter.
2. The SSO Program Vertical Control Monuments were established in the field and added to the program website, June 2, 2004 (see attachment).
3. The Ballasted Flocculation Unit pilot test was completed and the Final Report was submitted for review on June 25, 2004 (see attached correspondence).
4. A request for modifications to the Sanitary Sewer Overflow Response Plan, included as an attachment to Part C-Sanitary Sewer Overflow Response Plan of this Quarterly Report, was submitted June 30, 2004.
5. Additional information regarding the proposed 2nd Remedial Measures Action Plan (RMAP) projects, was submitted on June 30, 2004 (see attached correspondence).
6. The start up period of new distributor arms for trickling filters No. 6 & No. 8 at the South WWTP ended during this quarter.
7. The snail screens at the SWWTP are operational.

The City/Parish [is] [is not] in full compliance with Consent Decree for the period 4 / 01 / 04 to 6 / 30 / 04. If not, see comments above.

Introduction

In an effort to provide consistent vertical control for use on the SSO Program, the East Baton Rouge Parish Department of Public Works in conjunction with the U.S. Army Corps of Engineers, New Orleans District has established current orthometric elevations on twenty (20) existing vertical control monuments. The datum used for the orthometric elevation survey was NAVD88 using the Geoidal Model 2003. The elevations were determined utilizing dual frequency GPS technology in conjunction with a first order digital level using invar rods. This enabled an accuracy of plus or minus 2 to 3 centimeters relative to the project reference monument which was USGS Monument "E 197" (PID#BJ1001), Elevation = 28.68 feet, NAVD88.

Instructions for use: click on the ● next to the benchmark name to view the descriptions.



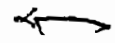


Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, Louisiana
70821

BRSSO 10.8
BRSSO 4.1



June 25, 2004

Peggy Hatch, Environmental Specialist Coordinator
Department of Environmental Quality
Enforcement Section
Post Office Box 82215
Baton Rouge, Louisiana 70884-2215

**Re: Baton Rouge City/Parish Consent Decree
Civil Action No. 01-978-B-M3
Pilot Testing and Analysis of Ballasted Flocculation Treatment**

Dear Ms. Hatch:

Enclosed please find a copy of the Final Report on the above referenced project conducted at the South Wastewater Treatment Plant. This project was conducted by the U.S. Army Corps of Engineers under contract with the City/Parish. As previously indicated, we hope the data from this pilot test study of the ballasted flocculation units is helpful in supporting the LPDES permit modification application to treat excess wet weather flows.

Should you have any questions concerning this matter, please contact me at (225) 389-3158 or Mr. Kent Mudd at (225) 389-3154.

Sincerely yours,

Fred E. Raiford III
Director of Public Works

Attachment

cc: Chief, Environmental Enforcement Section, US DOJ
Ms. Paula Roberts, LDEQ
Mr. Bruce Hammatt, LDEQ
Ms. Linda Levy, LDEQ
Ms. Vivian Hare, US EPA Region 6
Ms. Mona Tate, US EPA Region 6
Mr. Jerome M. Klier, DPW (w/out attachment)
Mr. Kent Mudd, DPW SOGA (w/out attachment)
Mr. Rick Wright, DPW SOGA (w/out attachment)
Mr. Robert Groht, Jr., DPW WWT (w/out attachment)
Mr. Bill McHie, MWH (w/out attachment)

Draft Report
for
Pilot Testing and Analysis of Ballasted Flocculation
(or Similar High-Rate) Treatment as Proposed for the
Sanitary Sewer Overflow Corrective Action Plan,
Baton Rouge, Louisiana

Contract Number DACW29-03-D-0025, Task Order 0002

Prepared for U.S. Army Corps of Engineers

June 2004

Prepared by

CH2MHILL
1515 Poydras Street, Suite 2110
New Orleans, Louisiana 70112

Department of Public Works

City of Baton Rouge
Parish of East Baton Rouge

Post Office Box 1471
Baton Rouge, Louisiana
70821

June 30, 2004

Chief, Water Enforcement Branch (6EN-W)
Compliance Assurance and Enforcement Division
U.S. Environmental Protection Agency - Region 6
1445 Ross Avenue Suite 1200
Dallas, TX 75202-2733

PROJECT

Subject: Baton Rouge City/Parish Consent Decree
Civil Action No. 01-978-B-M3
Clarification of 2nd RMAP

Attention: Mona Tates

As requested in our telephone conference call on June 9, 2004, we are submitting additional information to clear any confusion that may have been caused by our earlier submittal regarding the proposed 2nd Remedial Measures Action Plan (RMAP) for the subject Consent Decree. This information will describe in greater detail the 2nd RMAP projects, and specifically the use of the ballasted flocculation (BF) treatment process for wet-weather treatment. In order to assure you that we are taking a holistic system-wide management approach to addressing sanitary sewer overflows, we have included information about past and current sewer rehabilitation activities, which have always been a part of the total solution.

Since negotiating the Consent Decree all the way up to a recent March 2004 meeting with LDEQ and EPA, we were led to believe that permitting a wet-weather treatment facility was feasible – both through verbal discussions as well as correspondence from EPA Region 6 and EPA National Headquarters. We have proceeded forward with engineering planning and contracts in good faith, based on that information. In the last section of this letter we have included documents supporting the basis for that understanding.

The information provided in this letter is organized into the following sections:

- Description of 2nd RMAP projects
- Proposed Use of Ballasted Flocculation (BF) Process
- Collection System Rehabilitation Activities
- Summary of Historical Information and Meetings Regarding BF Permit

Description of 2nd RMAP Projects

The 2nd RMAP reflects the decision by the City/Parish to implement Alternative 7, one of the remedial measures identified in the Consent Decree. This alternative was a U.S. Army Corps of Engineers value engineering (VE) modification of the Sanitary Sewer Overflow (SSO) Corrective Action Plan (CAP), which was discussed and provided to EPA and LDEQ in August 1998. The purpose of the SSO CAP was to identify the most cost-effective method of controlling sanitary sewer overflows in the City/Parish sewer system while providing service to all customers and supporting future growth. The plan addressed three areas; operation and maintenance, sewer rehabilitation and capital improvements (such as conveyance system upgrades, storage, comprehensive sewer rehabilitation where cost-effective and new treatment systems). The fact that both the original SSO CAP (initiated prior to and during Consent Decree negotiations) and the current Consent Decree include operation and maintenance, sewer rehabilitation and capital improvement components reflects the system-wide holistic approach agreed to by all parties.

2nd RMAP Capital Improvements

The 2nd RMAP identifies specific capital improvements which, combined with the 1st RMAP capital improvements, is essentially Alternative 7 identified in the Consent Decree. The first RMAP includes all area-specific sewer rehabilitation (approximately 930,000 linear feet), selected system capacity upgrades, and the Choctaw storage facility. The current proposed 2nd RMAP includes 46 specific projects, including more system capacity upgrades. The 2nd RMAP projects can be grouped into four general categories, as indicated below. Details of each category are provided in the paragraphs below:

- Collection System Conveyance Upgrades
- Tunnel Systems
- Storage Facilities
- High-Rate Wet-Weather Treatment Facilities (also referred to as BF)

Collection System Conveyance Upgrades

Conveyance upgrades will maximize the existing collection system's ability to transport peak wet-weather flows to the deep gravity sewer network, treatment plants or storage facilities. The following conveyance upgrades are included in the 2nd RMAP:

- Approximately 388,000 feet of 8 to 60-inch diameter gravity sewer
- Approximately 193,500 feet of 6 to 42-inch diameter force main
- 17 new pump stations
- 57 modified pump stations

Tunnel Systems

A key component of the 2nd RMAP is a system of deep gravity sewers (tunnels) that will transport peak flows to the south and central wastewater treatment plants. An added benefit of the tunnel systems is the elimination of a significant number of pump stations. This will provide operation and maintenance cost savings and eliminate overflows due to power outages at those pump stations. Details of the tunnel systems include:

- Approximately 200,000 feet of 10 to 84-inch diameter gravity sewer
- Two tunnel pump stations – total capacity approximately 210 mgd
- Approximately 43,000 feet of 30 to 72-inch diameter force main
- Approximately 90 abandoned pump stations

Storage Facilities

In some areas, it is more cost-effective to store wet weather flows in the collection system and release the flows back into the existing collection system once capacity becomes available, for transport and treatment at the WWTPs. Locating storage upstream in the system also reduces the amount of downstream conveyance upgrades required to transport flows to the treatment plants. The tunnel systems, although primarily for collecting and transporting flows, also have a storage component. There are five storage facilities proposed in the 2nd RMAP with the following approximate capacities:

- Choctaw Storage – 50 million gallons
- South Tunnel System – 15 million gallons
- Central Tunnel System – 3 million gallons
- Baker/Zachary Storage – 1.1 million gallons
- Brightside Storage – 3 million gallons

High-Rate Wet-Weather Treatment Facilities (BF)

The 2nd RMAP submitted in November 2002 included the construction of four wet-weather treatment facilities utilizing the Ballasted Flocculation (BF) treatment process; three remote units in the North and Central WWTP collection systems and one at the South WWTP. Based on discussions with LDEQ and EPA Region 6 in 2002 and 2003, it was decided to relocate all BF treatment units to the WWTPs for the following reasons:

- Facilitate permitting
- Better operation and maintenance with existing on-site plant personnel
- Better monitoring of the final discharge
- Increased confidence of complying with permit effluent limitations
- Reduced time requirements for operator travel
- Increased security at existing plant sites
- Minimize public disruption by avoiding remote, residential sites

The March 2004 request to modify the RMAP projects and schedule indicated that all proposed BF treatment units would be located at the existing three WWTPs and operate as high-rate treatment processes. This reduced the total number of BF treatment units to three (the two BF units in the north area were combined into one unit at the NWWTP). Our design activities for associated projects, plans to conduct BF pilot testing at a WWTP and our permit application are all based on this scenario.

The approximate capacities of the proposed BF treatment facilities at the South, Central and North WWTPs are provided in the next section, along with the WWTP capacities. Moving the BF units to the WWTPs, and removing the tunnel segment connecting the Central and South tunnel systems as part of the March 2004 requested RMAP modifications, resulted in a change in the required BF unit capacities based on the collection system hydraulic model.

Proposed Use of Ballasted Flocculation (BF) Process

The BF treatment process is a high-rate physical-chemical treatment system that addresses wet-weather operational issues such as wide variations in flow rates and influent strength. Because it can be started up quickly (within 20 minutes), can adjust to the waste strength (by adjusting chemical feed rates) and requires little detention time (a small unit can treat a large flow rate), it is ideal for treating wet-weather flows.

Pilot testing and operational data at other locations indicate it can produce secondary treatment quality effluent (30 mg/l TSS and BOD) with one exception. Because of the dilute nature of the influent during wet-weather events, it cannot consistently meet the 85% removal requirement for BOD, although it can easily meet the 85% removal requirement for TSS. BOD removal rates are typically 60 to 70% of influent flow. However, by reducing the hydraulic load on the plant's biological treatment units, this allows the biological treatment to get better removal efficiencies. When the two flows are combined (biological and BF treatment) the final effluent can meet the 85% removal requirement. According to correspondence in June 2002 from EPA Region 6, the BF process is a credible secondary type treatment system.

For the Baton Rouge RMAPs, the source of wet-weather flows and flow schematics are slightly different at each of the three WWTPs. At the South WWTP the existing gravity collection system (CSD) and pressurized suburban transportation network (STN) will continue to transport flows to their respective pre-treatment trains prior to biological treatment. The tunnel system will transport flows to a junction box, which will direct wet-weather flows to the same pre-treatment trains and biological treatment units of the South WWTP until the peak capacity of the biological treatment units is reached. As the flows increase above that capacity, the new influent junction box will then divert all wet-weather flows in excess of the biological treatment capacity of the South WWTP to the BF treatment unit.

At the North WWTP the existing gravity collection system (CSD) and pressurized suburban transportation network (STN) will also continue to transport flows to their respective pre-treatment trains prior to biological treatment. Wet-weather flows from this WWTP service area will be diverted from the existing collection systems to two new wet-weather pump stations located in the collection system. These pump stations will only operate when influent flows at the North WWTP are in excess of the existing biological treatment capacity of the North WWTP and will pump directly to the BF treatment unit at the treatment plant site.

The BF treatment unit located at the Central WWTP will receive wet-weather flows directly from a new wet-weather pump station in the collection system (like the North WWTP system) and from a tunnel system junction box diverting only excess flows (like the South WWTP system). As with the other WWTP systems, only wet-weather flows in excess of the capacity of the Central WWTP biological units will be treated by the BF unit.

At all three WWTPs, once the excess flows receive treatment through the BF process, they will be disinfected and then combined with the WWTP's main treatment train for NPDES permit compliance sampling prior to being discharged to the Mississippi River at the existing permitted outfall. The BF flow rates will also require an expansion of the existing effluent pump station and force main systems at each WWTP.

The BF treatment units will be operated for the duration of the wet-weather event, until the WWTP influent flow rates fall within the peak flow capacity of the biological treatment units. Then the BF treatment units will be taken off-line and prepared for the next event. While the BF treatment units will be designed to treat the flows from the SSO CAP design storm event, hydraulic modeling of the collection system indicates that they will be operated approximately 16 times per year at each WWTP.

Included with this letter are several attachments indicating schematic flow routings and capacities for existing and BF treatment facilities at each WWTP. The approximate capacities of the proposed BF treatment facilities at the South, Central and North WWTPs are shown below along with the WWTP capacities.

	WWTP Capacity	BFU Peak Capacity
South WWTP	120 mgd	100 mgd
Central WWTP	65 mgd	80 mgd
North WWTP	130 mgd	70 mgd

We just recently completed pilot testing two BF-type treatment units at the Baton Rouge South WWTP, and copies of the draft final report have been sent to EPA Region 6 and LDEQ under separate cover. The results of simulated wet-weather events (approximately 8 hours) and actual wet-weather events indicate that both systems are capable of achieving low effluent concentrations and high removal efficiencies – even on dilute influent flows.

Effluent concentrations for BOD5 and TSS were consistently below 30 mg/l and very often below 15 mg/l. TSS percent removals were consistently above 85%, and BOD5 percent removals ranged from 76 to 89% - far above the targeted 65% removal rate. All test results exceeded the pilot test acceptable treatment levels and approached (and sometimes exceeded) the treatment goals established.

Collection System Rehabilitation Activities

In the 1970's the City-Parish began performing sewer system evaluation surveys (SSES) and contracts were let for major structural repair and replacement in the 1980's. The sewer rehabilitation work continued throughout the 1990's, predominantly in the older parts of the collection system, based on the results of flow monitoring data. Flow data in the project areas indicated high ratios of wet- to dry-weather flow. From 1993 to 1999, the City-Parish spent approximately \$53 million on collection system rehabilitation construction.

In 2000, a sewer inspection prioritization plan was initiated as part of the City-Parish's collection system preventive maintenance program. This plan was later incorporated into the Consent Decree as part of the March 2001 Collection System Preventive Maintenance Plan (Appendix H to the Consent Decree). The prioritization plan was a key component of the City-Parish's holistic approach to managing the sewer collection system. The purpose of the prioritization plan was to:

- Prioritize inspection of the collection system for rehabilitation
- Plan to inspect the entire sewer collection system in a reasonable time frame

For each of the 36 sewer basins in the collection system, the prioritization plan considers factors such as rainfall dependent I/I, sewer criticality/level of service, customer complaints, population and groundwater infiltration in determining the prioritized rank (see attached Exhibit 12 from Prioritization Plan).

The sewer prioritization plan provides the City-Parish a thorough approach to inspection and rehabilitation of the entire collection system. By using the plan as a guide and inspecting approximately 570,000 linear feet annually, the entire City-Parish collection system will be inspected and considered for rehabilitation in a 15-year period.

While the inspection prioritization plan was being developed, the City-Parish also developed a sewer defect condition classification system and a rehabilitation decision support system to standardize criteria and rehabilitation decision logic. Together, these systems define/classify sewer defects and utilize pre-defined criteria to assure that sewer rehabilitation is performed in a cost-effective and consistent manner. The City-Parish's decision model helps assure that the most appropriate rehabilitation method is used on a sewer line given the in-pipe defects and above-ground conditions. Typical rehabilitation methods/techniques used for City-Parish projects include:

- Main line partial and full remove & replacement (*open-cut construction methods*)
- Main line Pipe Bursting (*trenchless construction method*)
- Main line Cured-in-place-pipe lining (*trenchless construction method*)
- Service line replacement in the public right-of-way

Since entering into the Consent Decree, the City-Parish's sewer rehabilitation work can be generally categorized in two ways. The first of these is Consent Decree required rehabilitation. The First Remedial Measures Action Plan specifies collection system rehabilitation work (see Projects N-99 and S-99), and these projects are in areas identified as needing I/I mitigation. In addition to the First RMAP rehabilitation projects, the City-Parish is also performing proactive rehabilitation work generated as a result of the prioritized sewer inspection reporting system discussed above. This work helps meet the Section XII Consent Decree requirement to spend at least \$3M annually on sewer repairs, sewer rehabilitation and other capital needs related to I/I reduction.

In addition to the Consent Decree-required rehabilitation work, the City-Parish is also devoting additional sewer rehabilitation and maintenance funds to provide for proper operation and maintenance of the system. This sewer rehabilitation includes, for example, emergency repair activities and those repairs required as a result of customer complaints. The City-Parish also funds an active CMOM-type Asset Management Program focused on effective management of the sewer system infrastructure. This Program includes tasks to maintain a sewer information management system, conduct long-term planning, perform field inspections and investigations, and manage the sewer rehabilitation initiatives. All of these efforts are focused on improving the sewer collection system above and beyond the requirements of the Consent Decree.

The table below summarizes 1990's rehabilitation (1993-1999), recent City-Parish sewer repair work (2000-2003) and the projected collection system rehabilitation throughout the Consent Decree duration (2004-2015). Also attached is a map providing a graphical depiction of the sewer rehabilitation work performed to date.

Time Period	<i>Required by Consent Decree</i>		<i>Not Required by Consent Decree</i>	TOTALS
	RMAP RehabProjects	\$3M/yr I/I Reduction	Misc. Management and O&M Work/Projects *	
1993-1999	N/A	N/A	\$ 53.0 M	\$ 53.0 M
2000-2003	\$ 2.6 M	\$ 7.6 M	\$ 27.5 M	\$ 37.7 M
2004-2015	\$ 34.0 M	\$ 36.0 M	\$ 48.2 M	\$ 118.2 M
TOTALS	\$ 36.6 M	\$ 43.6 M	\$ 128.7 M	\$ 208.9 M

* Includes all annual emergency investigation and repair contracts, Asset Management Program tasks, inspection contracts, and all other contracts providing management, operation and maintenance of the collection system.

Through all of these rehabilitation efforts, the City-Parish is mitigating the dominant sources of I/I while structurally repairing and renewing the sewer collection system infrastructure.

Our review of recent rehabilitation programs throughout the country, and EPA's proposed SSO policy in January 2001, indicate that system-wide sewer rehabilitation is far less effective than previously expected. According to EPA, "large expenditures for the correction of I/I sometimes produced only a small reduction in infiltration. By 1989, EPA revised its estimate of I/I removal to 40 percent [from previous 70 to 100 percent] of the estimated infiltration. The Agency also recognized that the correction of excessive infiltration is likely to be unsuccessful in certain circumstances." Although the I/I reduction effected by our on-going rehabilitation projects is difficult to quantify, any I/I reduction will allow us to capture a larger or more intense storm event within the existing system in the future.

Specific cost-effective sewer rehabilitation projects to be completed as part of the Consent Decree are typically in smaller upstream drainage areas. These projects utilize rehabilitation to resolve local surcharge/flooding problems. Combined with the system-wide inspection and rehabilitation program included in the Consent Decree, this strategy provides a cost-effective approach to long-term maintenance and operation of the system.

Summary of Historical Information and Meetings Regarding BF Permit

While we were negotiating the terms of the Consent Decree, in January 2001, EPA Headquarters issued proposed rules to clarify and expand permit requirements under the Clean Water Act. These proposed rules included discussion of peak excess flow treatment facilities, similar to what was proposed under Alternative 7 in the Consent Decree.

In March 2001, EPA Headquarters provided an update on the status of their efforts to clarify NPDES permit requirements – specifically "where peak wet weather flow is routed around biological treatment units and then blended with the effluent from the biological units prior to discharge." This letter (attached) indicates NPDES authorities have considerable flexibility to account for different peak flow scenarios and can permit such a scenario if:

- Final discharge meets effluent limitations for secondary treatment
- NPDES permit specifically recognizes peak flow management
- Alternative flow routing is only used when flows exceed capacity of existing facilities
- During peak flow conditions, the peak flow system is operated as designed
- Permit requires collection system be properly designed, operated and maintained

In December 2001, EPA Headquarters issued a draft memo providing further guidance on NPDES permits for wet weather conditions. Two wet weather treatment scenarios were discussed in this memo:

- Treatment in the collection system with direct discharge to a receiving stream
- Treatment at a WWTP and blending with effluent from the main treatment train

After the Consent Decree was approved in March 2002, we participated in a meeting with LDEQ in October 2002, where the general consensus was that moving wet weather treatment facilities to a WWTP would be a better system and would be much easier to permit (compared to remote-located units with a direct discharge to the Mississippi River). A direct discharge would require a new permit, whereas locating a BF unit at a WWTP and incorporating it into the treatment plan would be a permit modification, much like the Ft. Worth TX and Shreveport LA permits. Based on that meeting, we proceeded to coordinate pilot testing of the BF process to support our permit application.

In June 2002, EPA Region 6 provided a response to U.S. Filter (attached) regarding NPDES permitting and the use of their specific process, ACTIFLO Ballasted Flocculation, for wet weather flows. This letter indicated the following:

- Region 6 strategy does not mandate the use of any particular method for processing wet weather flows
- The Actiflo process provides a credible secondary type treatment process
- The 65% removal target for peak flow treatment systems applies to remote facilities with a direct discharge
- "Where a peak flow treatment system is located at a POTW, as is the case in Fort Worth, an 85% removal monthly average will apply to the combined effluent"

We participated in various telephone conference calls and meetings with LDEQ and EPA Region 6 early in 2003 regarding the 2nd RMAP and BF permitting, including February 16, February 21, and June 10. In July 2003, we met with LDEQ and EPA Region 6 representatives in Baton Rouge specifically to discuss the requirements to permit the BF process at the Baton Rouge WWTPs as a wet-weather treatment process, to be blended with biologically treated flows. Representatives from EPA Region 6 NPDES Permits Section participated via conference call from Dallas. Discussion revolved around limiting the use of such a facility to eleven (11) times a year (which is what the draft Shreveport permit indicated), or allowing use whenever flows exceeded the WWTP capacity. The final Shreveport permit indeed was modified to allow use of the wet weather facility based on flows exceeding WWTP capacity, not a specified number of events per year. We were told in that meeting that LDEQ and EPA Region 6 conceptually did not have a problem with the BF process, and that it appeared a permit could be written following the philosophy of the recent Shreveport permit.

When we submitted the permit application in January 2004, with a copy to EPA Region 6, we specifically stated that we were proposing to use the BF treatment unit "as a means to treat excess wet weather flows" and use them, "whenever flows at the wastewater treatment plant exceed the existing treatment plant capacity." We also indicated that these facilities were part of the Consent Decree 2nd RMAP.

When we submitted the BF pilot testing plan in February 2004 to LDEQ and EPA Region 6 for review and comment, we indicated that this was in support of the recent permit application to treat excess wet weather flows. The introduction of the report also identified that the evaluation of the BF process was to support the use of the BF process at a treatment plant, blending the BF effluent with effluent from the main plant prior to discharge.

In a meeting May 25, 2004 with LDEQ, we discussed in detail the status of the Baton Rouge permit application and the fact that the Baton Rouge permit would be very similar if not identical to the Shreveport permit because the use would be identical.

In summary, I trust that the information provided demonstrates that the current RMAPs, based on Alternative 7 and the original SSO Corrective Action Plan, as agreed to during consent decree negotiations, does indeed provide a comprehensive, holistic approach to addressing sanitary sewer overflows in the City/Parish. Rehabilitation is a key component to our approach and is being vigorously implemented along with cost-effective capital improvements, including storage facilities. The use of the ballasted flocculation process for treatment of wet weather flows is also an integral cost-effective component of our overall plan. We have consistently and openly indicated our desire to use this process, and received positive encouragement by various regulatory agencies that permitting was feasible. We respectfully request that you provide us the same opportunity and consideration as other municipalities in EPA Region 6 regarding the use of this wet-weather treatment technology.

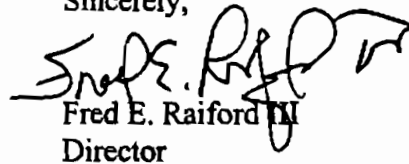
We respectfully request your approval of the implementation of the BF treatment process and relocation of the BF units to each existing WWTP site, as described in this letter. The City-Parish has entered into engineering contracts in good faith based on the understanding that a wet-weather treatment facility using the ballasted flocculation process was allowable within the Consent Decree. Therefore, this approval is critical to our meeting the Consent Decree schedule. Following your timely review, we are available at your convenience to meet and discuss any issues your staff may have.

I certify that the information contained in or accompanying this letter is true, accurate and complete. As to those identified portions of this submission 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.

June 30, 2004

Page 11

Sincerely,



Fred E. Raiford III
Director

Attachments

cc: The Honorable Bobby Simpson, Mayor-President
Mr. Paul Thompson, Chief Administrative Officer
Mr. Jim Thompson
Ms. Irys Allgood
Mr. Jerome M. Klier
Mr. Jeff Broussard
Mr. Mark LeBlanc
Mr. Kent Mudd
Mr. Richard Wright
Mr. Robert Groht
Mr. David Ratcliff
Mr. Michael T. Donnellan (DOJ)
Mr. Carlos Zequeira (EPA 6RC-EA)
Ms. Vivian Hare (EPA 6EN-WC)
Mr. Harold Leggett (LDEQ)
Ms. Linda Levy (LDEQ)
Ms. Peggy Hatch (LDEQ)
Mr. Bruce Hammatt (LDEQ)
Mr. Ted Broyles (LDEQ)
Mr. Bill McHie (MWH)