BATON ROUGE SSO PROGRAM 2002 CONSENT DECREE



2020 ANNUAL REPORT

January 29, 2021



January 29, 2021

CERTIFIED - RETURN RECEIPT REQUESTED

Ms. Cheryl Seager Director Water Enforcement Branch (6EN-W) Compliance Assurance and Enforcement Division U.S. Environmental Protection Agency, Region VI 1201 Elm Street, Suite 500 Dallas, TX 75270-210

Re: City of Baton Rouge and Parish of East Baton Rouge Consent Decree-Civil Action No. 01-978-B-M3 Annual Report – Period Ending December 31, 2020

Ladies and Gentlemen:

Pursuant to Paragraph 52 of the Consent Decree, the City of Baton Rouge and Parish of East Baton Rouge (City/Parish) hereby submits the Annual Report covering activities for the year ending December 31, 2020. This report addresses the following items:

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

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

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

Sincerely,

Richard Speer, P.E. Environmental Services Director

Cc: Honorable Sharon Weston-Broome, Mayor-President Mr. Darryl Gissel, Chief Administrative Officer Mr. Kelvin Hill, Assistant Chief Administrative Officer Chief, Environmental Enforcement Section, US DOJ Mr. Bobby Mayweather, LDEQ Dr. Chuck Carr Brown, LDEQ Ms. Mona Tates, US EPA Region 6 Mr. Carlos Zequeira, (6RC-EA) Ms. Darlene Whitten-Hill, (6EN-WC) Mr. Anderson Dotson, III Mr. Bob Abbott Mr. Adam M. Smith Mr. Rickey P. Brouillette Mr. Joseph Young, Jacobs Mr. Obie Watts, Jacobs Mr. Carlos Giron, Jacobs Ms. Daymara Mesa, Jacobs Ms. Cheryl Berry Mr. Ted D. Stephens Mr. John Ward Mr. Paul Nata



DATE: January 29, 2021

TO: Ms. Cheryl Berry, DES

FROM: Ms. Daymara Mesa, Jacobs

SUBJECT: City of Baton Rouge and Parish of East Baton Rouge Consent Decree-Civil Action No. 01-978-B-M3 2020 Annual EPA Report Data Review

Ms. Berry,

Draft copies of the above referenced report have been submitted for your review. This review is to ensure that the data submitted under your direction, has been stated in a truthful and accurate manner in the 2020 Annual EPA Report. Once the review of the data is complete and corrected, please sign below the paragraph stating that fact and return for processing.

Sincerely,

Daymara Mesa

I certify that the information contained in or accompanying the portion of the 2020 Annual EPA Report that I am responsible for is true, accurate, and complete. As to those identified portions of this document for which I cannot personally verify their truth and accuracy, I certify as the official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification, that this is true, accurate and complete.

Document Control

cc:



DATE: January 29, 2021

TO: Mr. Adam Smith, DES

FROM: Ms. Daymara Mesa, Jacobs

SUBJECT: City of Baton Rouge and Parish of East Baton Rouge Consent Decree-Civil Action No. 01-978-B-M3 2020 Annual EPA Report Data Review

Mr. Smith,

Draft copies of the above referenced report have been submitted for your review. This review is to ensure that the data submitted under your direction, has been stated in a truthful and accurate manner in the 2020 Annual EPA Report. Once the review of the data is complete and corrected, please sign below the paragraph stating that fact and return for processing.

Sincerely,

Daymara Mesa

I certify that the information contained in or accompanying the portion of the 2020 Annual EPA Report that I am responsible for is true, accurate, and complete. As to those identified portions of this document for which I cannot personally verify their truth and accuracy, I certify as the official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification, that this is true, accurate and complete.

Adam M Smith

CC:

Document Control

BATON ROUGE SSO PROGRAM 2002 CONSENT DECREE

2020 ANNUAL REPORT

January 29, 2021

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Baton Rouge Consent Decree 2020 Annual Report

This Annual Report for the period from January 1, 2020 to December 31, 2020 is submitted in accordance with Section XVIII, Reporting Paragraph 52, of the Consent Decree. This report addresses all items identified in Consent Decree Exhibit I regarding the Annual Report format and content.

During the past year, there continues to be significant progress made towards achieving Second Remedial Measures Action Plan (RMAP2) compliance and additional projects outside of the Consent Decree. By the end of 2018, the City of Baton Rouge/Parish of East Baton Rouge (City/Parish) had functionally completed all RMAP projects in accordance and in compliance with the Consent Decree 100% Milestone as shown in Tables 2, 3, and 4 of this Annual Report. Additionally, as of December 31, 2020, there have been 97 Consent Decree reporting deliverables submitted on or ahead of schedule.

1.1 Remedial Measures Action Plan

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

1.1.1 RMAP1 Summary

The First RMAP (or RMAP1), submitted on January 10, 2001, consisted of the projects that were common to all three of the lowest cost VE options (3, 4, and 7) being evaluated. These RMAP1 projects listed in Exhibit F of the Consent Decree were those projects common to the alternatives presented in Section XII - Remedial Measures: Collection System Remedial Program of the Consent Decree. There were a total of 19 "common" projects identified through various modeling and VE efforts associated with the original SSO Corrective Action Plan developed by MWH in 1998. These projects were common to the alternative plans presented in the Consent Decree that focused on utilizing deep tunnels/storage to control the SSOs throughout the City/Parish's wastewater collection system. The phased implementation of these RMAP1 projects began at the end of 1999 and the beginning of 2000. These projects were planned to start and finish at different times due to funding constraints and the need for easements and permits. Since the date of entry into the Consent Decree, the City/Parish has been diligently working on the design and construction of these RMAP1 projects; all of these projects have been completed. During the planned execution of these projects, significant events occurred with the change in technical approach of the Collection System Remedial Program and, as such, some RMAP1 projects have been affected. Any, and all, such changes have been reported in previous reports.

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

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

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

The status of the RMAP1 projects is presented in Table 1 and is current through December 31, 2011. As of that time, all 14 RMAP1 projects are functionally completed, and 13 of the 14 were done either on, or ahead of schedule. The RMAP1 - Industriplex Project has had several issues arise during the construction phase pertaining to: unavoidable utility conflicts, difficult easement acquisitions, alignment changes, and permitting and other utility coordination issues that have caused significant delays with the project which could not be overcome by reasonable actions by the City/Parish and its construction contractor. Therefore, this project has been functionally complete and in operation since 1st quarter 2011. The City/Parish strongly asserts that this project is not susceptible to stipulated penalties due to the circumstances of the delay beyond the control of the City/Parish. The circumstances behind the delay are explained in detail in Table 1 below, and have been also reported in previous Quarterly EPA Reports. The *RMAP1 Completion Report* is included in previously submitted/approved 2011 Annual EPA Report in Attachment 1: Updated Outreach and Public Awareness Plan and RMAP1 Completion Report and can also be found attached at the end of the 36th Quarterly EPA Report.

		RMAP1 Projects Completed	RMAP1 Projects Completed	
Milestone Date		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	Project Status Summary
Consent Decree Projects	Corresponding City/Parish Projects			
N-05 PS 24 Area Upgrades	*PS 24/43 Area Upgrade	٠		
N-06 PS 43 Area Upgrades	(01-RMP-N05)			
N-09 PS 44/46 Area Upgrades	PS 44/46 Area Upgrades (01-RMP-N09)	٠		
N-10 PS 240 Area Upgrades	PS 240 Area Upgrades (01-RMP-N10)	٠		
***N-99 North Further	NTSN SS Eval. Study (99- RMP-N-99)	•		
Investigations	**Bellingrath Rehab. (03-RMP-N14) (NSRP)	•		

Table 1. EPA Consent Decree RMAP1 Milestones

Table 1. EPA Consent Decree RMAP1 Milestones

		RMAP1 Projects Completed	RMAP1 Projects Completed	
Milestone Date	-	May 4, 2007	Proposed on September 1, 2008	-
Construction Status		Complete	Complete	- Project Status Summary
Consent Decree Projects	Corresponding City/Parish Projects		·	i
	**Frenchtown Road Sewer Rehab. (03-RMP- N15)	٠		
	**North Area Comprehensive Rehab. (03-RMP-N23)	٠		
	**PS 45 Area Rehab. (00-RMP-N31)	•		
C-03 PS 2 Area Rehabilitation	PS 2 Area Upgrades (01- RMP-C03)	٠		
S-01B SWWTP Influent PS	SSO SWWTP Infl. PS Upgrade (99-RMP-SO1B)	٠		
S-11 PS 40 Area Rehabilitation	S-11 PS 40 Area Rehabilitation	٠		
	SSO Engr-South (99- RMP-S99)	٠		
***S-99 South	PS 944 Area Upgrade Grv Sewer (99-RMP-S99)	•		
Further Investigations	PS 944 Area Upgrade (99-RMP-S99)	•		
	PS 177 Area Upgrade (99-RMP-S99)	•		
	**PS 211 Area Upgrades (99-RMP-S11)	٠		
N-01 Choctaw Basin Return System	Choctaw Area Storage (04-RMP-N22)			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage.
N-13 North Choctaw Basin System	S-05 PS 58B Area Upgrades MWH RMAP2			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage PS.
N-04 PS 47 Area Upgrades	N-04 PS 47 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-07 PS 39/55 Area Upgrades	N-07 PS 39/55 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-11 PS 65 Area Upgrades	PS 65 and 65A Area Upgrades (01-RMP-N11)			Project suspended. Evaluated for inclusion in RMAP2 and Master Plan. Project proposed as a part of the Master Plan.
N-02 PS 49/52 Area Upgrades	PS 49/52 Area Upgrade (01-RMP-N02)		4 th Quarter 2008	Project completed – 4 th quarter 2008 (at 80% complete with construction). Project was in dispute with construction contractor. Both partie reached an agreement on terms and job was closed at 80% complete.
N-12 North Sewer Rehab Projects	North Sewer Rehab Projects (03-RMP-N12)		4 th Quarter 2007	Project completed – 4 th quarter 2007.
S-08 Industriplex Area Upgrades	Industriplex Area PS 355 and FM Upgrades (99- RMP-S08)		2 nd Quarter 2010	Project completed – 1 st quarter 2011.
S-14 Kleinpeter Area Upgrades	Kleinpeter Area Upgrades (03-RMP-S14)		2 nd Quarter 2010	Project completed – 2 nd quarter 2009.

Table 1. EPA Consent Decree RMAP1 Milestones

		RMAP1 Projects Completed	RMAP1 Projects Completed	
Milestone Date		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	Project Status Summary
Consent Decree Projects	Corresponding City/Parish Projects			
S-16 PS 136 Area Upgrades	PS 136 Area Upgrades (99-RMP-S16)		2 nd Quarter 2010	Project completed – 2 nd quarter 2010.

* This project was executed as a combination of two RMAP1 projects

** These projects were added as RMAP1 projects by the City/Parish after entry into the Consent Decree

*** This RMAP1 project was split up into multiple projects for better execution

1.1.2 RMAP2 Summary

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

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

The revised RMAP2, submitted by the City/Parish and CDM, had not yet been approved by the EPA and LDEQ in early 2006 when the City/Parish engaged Jacobs to conduct a peer review to address issues about elements of the alternative plan including an assessment of costs and schedules and a reassessment of the South Wastewater Treatment Plant (WWTP) proposed work. Based on the peer review recommendations, a re-submittal, and the second request for approval, of the Revised RMAP2 modifications (including CDM's plan and Jacobs' updated plan for South WWTP compliance projects) was submitted by the City/Parish in conjunction with Jacobs on December 12, 2006. Jacobs was also selected as the new Program Manager, or City/Parish consultant, for this work during this timeframe. Per EPA and LDEQ request, a more descriptive follow-up report entitled *Addressing Existing Noncompliance Issues and Future Wet-Weather Flow Management Requirements for the South Wastewater Treatment Plant – Summary of Findings and Recommendations* was submitted in January 2007 that specifically addressed work at the South WWTP. This report detailed the recommendations outlined in the previous Revised Second RMAP submittal in December 2006. On July 10, 2007, the EPA and LDEQ sent a formal letter of approval to the City/Parish endorsing the December 2006 Revised Second RMAP proposal.

Since that time, a huge planning and engineering effort was undertaken by the City/Parish and the new Program Manager, Jacobs, and others in order to develop and implement a detailed RMAP2 submittal based on three (3) types of projects: comprehensive sewer rehabilitation, pump station and transmission (capacity) improvements, and wastewater

treatment/storage improvements. This planning and engineering effort consisted of refined modeling and calibration, detailed calculations, review of field data, and project development, prioritization, and cost estimating. This RMAP2 submittal outlined the projects planned to reduce or eliminate SSOs throughout the City/Parish, in addition to describing the projects planned to meet permit requirements at the wastewater treatment plants. *The Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* report was submitted to the DOJ, EPA, and LDEQ for review and approval in September 2008. The proposed plan represented a substantial commitment to try to meet the original demanding schedule required by the Consent Decree (January 1, 2015). The City/Parish and Jacobs continually refined and performed quality control reviews of the hydraulic model of the sewer system, incorporating new information as it became available. These refinements at times have technically altered some aspects of the RMAP2 projects. However, the City/Parish regularly documented all RMAP2 project changes (scope changes, project additions, and project deletions) in the Quarterly and Annual EPA Reports, with EPA and LDEQ approval.

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

Soon thereafter, the City/Parish and Jacobs developed a technical memorandum titled *Response to Public Comments of the Agreement and Order Regarding the Modification of the Consent Decree - Civil Action No. 01-978-B-M3 (M.D. La.)* which included the City/Parish's response to the two public comments received by the DOJ on December 17, 2008 from Mr. Steve Irving and Ms. Kathryn Lewis. The memorandum was initially submitted on January 23, 2009, was later updated based on comments received by DOJ, and was eventually submitted as a final version of the memorandum on February 27, 2009. The City/Parish believed that it provided a comprehensive response to the public comments received, and also highlighted the extensive progress that has been achieved to date associated with the Consent Decree. Additionally, many actions to address the concerns expressed in the public comments received were already either completed or underway. The City/Parish requested at the time that the Court timely approve the modification, as the City/Parish had multiple projects that were currently ready to begin design as soon as the Consent Decree modification was approved. On April 22, 2009, the DOJ, EPA, and LDEQ approved the Agreement and Order which specifically adopts the City/Parish's *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008).

Since its approval, the City/Parish has been actively moving forward with implementation of the projects included in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). However, in early 2011 the City/Parish began realizing effects of an extremely compressed compliance schedule, as well as concerns with affordability issues emerging with executing over \$1 billion in projects in less than 6 years (which was the time left in the original compliance schedule required from 2002). Additionally, there had been numerous force majeure events affect the City/Parish, that took time away from normal operations that have also adversely affected the implementation schedule. Therefore, in July 2011, the City/Parish decided to submit a request for time extension (3 years), *2011 Request for Time Extension/Modification of the Compliance Schedule in the Approved RMAP2 Submittal*, for the RMAP2 projects listed in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). Shortly after its submission, the City/Parish started incorporating some schedule

modifications to take into account the proposed changes included in the request for time extension (3 year extension request) in anticipation of its quick approval.

However, during many discussions with DOJ, EPA, and LDEQ it was eventually agreed that the City/Parish submit a revised request for time extension (4 years) for the RMAP2 projects listed in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). One of the reasons for this request was for the City/Parish to accelerate the schedule of several "additional projects" (described later in this report in *Section 1.3 Additional Projects Outside of the Consent Decree*) that were planned throughout the City/Parish once all the RMAP2 projects were completed. The 4-year extension request was eventually submitted on October 23, 2012 and was included in the document titled *Modified Request for Time Extension/Modification of the Compliance Schedule in the Approved RMAP2 Submittal*. The City/Parish's updated request for time extension (4 years) for the RMAP2 project was signed/formalized by DOJ/EPA/LDEQ on June 18, 2013. The City/Parish has therefore incorporated schedule modifications in tables 2, 3 and 4 below to take into account any changes included in the approved 4-year request for time extension in 2013.

As of December 31, 2018, the City/Parish was able to successfully functionally complete all RMAP2 construction included herein, as outlined in the April 2009 Consent Decree Modification by DOJ, EPA, and LDEQ that adopts the corresponding *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). The City/Parish is adhering to the revised compliance schedule approved in the (June 2013) Revised Second Consent Decree Modification by DOJ, EPA, and LDEQ which formally approves the City/Parish's <u>4-year</u> extension request which was the focus of the *Modified Request for Time Extension/Modification of the Compliance Schedule in the Approved RMAP2 Submittal* (October 2012).

As previously mentioned, as of December 31, 2018 all one hundred and fifteen (115) projects are functionally completed.

Force majeure events in past years (including Hurricanes Katrina, Rita, and Gustav, the Gulf of Mexico oil spill, 2011 Mississippi River flood, Tropical Storm Lee, Hurricane Isaac, the Great Flood of 2016, and other extreme storm events) can significantly impact not only project costs, but also contractor availability and project schedules. The Consent Decree schedule was very demanding, and the time from these force majeure events greatly affected the program. The City/Parish was nonetheless able to meet the 100% milestone and keeps track of these events and their potential effect on other Consent Decree elements' schedule and compliance.

Periodically, the City/Parish and Jacobs re-evaluates projects as a part of the Program Delivery Plan Update (PDP Update), or Project Value Engineering (VE) analysis. Included is a continual refinement and quality control review of the hydraulic model of the sewer system, and all necessary modifications of the model incorporating new information as it is available. These on-going refinements in the past have slightly altered some of the RMAP2 projects to improve their effectiveness, or have helped streamline construction activities, etc. With EPA and LDEQ approval, the City/Parish has been regularly documenting all RMAP2 project changes (scope changes, project additions, project deletions, project merging, name changes, and schedule changes) that have been made in the annual PDP Updates, Project VE, and in the Quarterly and Annual EPA Reports. Therefore, Tables 2, 3, and 4 have been updated to reflect any changes associated with these on-going efforts.

The RMAP2 projects are separated into three categories with descriptions and schedules provided for all projects, current through December 31, 2018.

1.1.2.1 Category 1: Comprehensive Sewer Basin Rehabilitation

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

Table 2 presents the Category 1 comprehensive rehabilitation sub-basin projects and their met delivery milestone schedules. Pump station improvements are included in the projects listed in Category 2, Pump Station and Transmission Improvements in Table 3 on the following pages.

Table 2. EPA Consent Decree RMAP 2 Milestones for Category 1 Projects

	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1 st QTR 2013	2 nd QTR 2015	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
efferson Hwy – HooShooToo Road	•			Project completed – 3 rd quarter 2009
Staring Lane – Boone Drive Area Rehabilitation Project	٠			Project completed – 2 nd quarter 2010
Burbank Drive – Gardere Lane Area Rehabilitation Project	٠			Project completed – 1 st quarter 2011
Oak Villa –Choctaw Street Area Rehabilitation Project	٠			Project completed – 3 rd quarter 2011
Scotland Avenue – Progress Road Area Rehabilitation Project	٠			Project completed – 2 nd quarter 2011
Elm Grove Garden Road – Harding Boulevard Area Rehabilitation Project	٠			Project completed – 3 rd quarter 2011
Sharp Road – Florida Boulevard Area Rehabilitation Project	•			Project completed – 3 rd quarter 2012
Kenilworth Boulevard – Boone Drive Area Rehabilitation Project	•			Project completed – 3 rd quarter 2012
Foster Drive - Government Street Area Rehabilitation Project Phase A	•			Project completed – 4 th quarter 2011
Foster Drive - Government Street Area Rehabilitation Project Phase B	٠			Project completed – 3 rd quarter 2012
Silverleaf Road – Ford Street Area Rehabilitation Project	٠			Project completed – 4 th quarter 2012
Brookstown Road - Evangeline Street Phase I Area Rehabilitation Project	•			Project completed – 4 th quarter 2012
Brookstown Road – Evangeline Street Phase II Area Rehabilitation Project	٠			Project completed – 4 th quarter 2012
Bluebonnet Blvd – Jefferson Hwy Phase I Area Rehabilitation Project		•		Project completed – 4 th quarter 2012
Bluebonnet Blvd – Jefferson Hwy Phase II Area Rehabilitation Project		•		Project completed – 1 st quarter 2013
Highland Road – Washington Street Area Rehabilitation Project		•		Project completed—3 rd quarter 2013
Stanford Avenue – Morning Glory Road Area Rehabilitation Project	•			Project completed – 4 th quarter 2012
Airline Highway – Goodwood Blvd Phase I Area Rehabilitation Project		•		Project completed-3 rd quarter 2014.
Airline Highway – Goodwood Blvd Phase II Area Rehabilitation Project		•		Project completed – 2 nd quarter 2015
Acadian Thruway – Claycut Road Area Rehabilitation Project		•		Project completed – 1 st quarter 2013
Acadian Thruway – Perkins Road Area Rehabilitation Project	٠			Project completed – 4 th quarter 2012
Antioch Road – Chadsford Drive Area Rehabilitation Project		•		Project completed – 2 nd quarter 2015
Jones Creek Road – Tiger Bend Road Area Rehabilitation Project			•	Project completed – 1 st quarter 2016

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Table 2. EPA Consent Decree RMAP 2 Milestones for Category 1 Projects

	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1 st QTR 2013	2 nd QTR 2015	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Scenic Highway – Spanish Town Road Phase I Area Rehabilitation Project		•		Project completed – 2 nd quarter 2015
Scenic Highway – Spanish Town Road Phase II Area Rehabilitation Project			٠	Project completed – 2 nd quarter 2016
Siegen Lane – Interstate 10 Area Rehabilitation Project			٠	Project completed – 2 nd quarter 2017
Interstate 110 – Hollywood Street Area Rehabilitation Project			٠	Project completed – 3 rd quarter 2015
Ardenwood Drive – Winbourne Street Area Rehabilitation Project			٠	Project completed – 3 rd quarter 2016
Flannery Road – Florida Boulevard Phase I Area Rehabilitation Project			•	Project completed – 3 rd quarter 2017
Flannery Road – Florida Boulevard Phase II Area Rehabilitation Project			•	Project completed – 4 th quarter 2018
East Boulevard – Government Street Area Rehabilitation Project			٠	Project completed – 3 rd quarter 2017
North 38 th Street – Gus Young Avenue Area Rehabilitation Project			٠	Project completed – 3 rd quarter 2018

*A project is deemed "Functionally Complete" when a project has been constructed in accordance with the engineering and operation specifications and has been tested to function as required. The definition functionally complete may or may not mean that the asset has been put into service as designed. Further definition can be found within Quarterly Report #56.

1.1.2.2 Category 2: Pump Station and Transmission Improvements

The Infoworks digital wastewater model was used to identify necessary increases in the capacity of existing gravity trunk sewers, pump stations, and transmission mains to accommodate peak wastewater flows remaining in the rehabilitated collection system. Table 3 presents a list of Category 2 projects with corresponding met milestone schedules, current through December 31, 2020.

	33% Milestone	66% Milestone	100% Milestone	_
Milestone Date	1st QTR 2013	2 nd QTR 2015	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	-
	Proje	ct Description	s RMAP2 Pro	jects
Capitol Lake – Gayosa Street Area Capacity Improvements	•			Project completed - 2 nd quarter 2012.
Gurney Road - Joor Road	•			Project completed - 4 th quarter 2009.
Sullivan Rd./Lovett Rd./Wax Rd. Sewer Upgrades	•			Project completed - 1 st quarter 2011.
Comite Road – Foster Road Sewer Area Upgrades - Phase I	٠			Project completed - 2 nd quarter 2010.

Table 3. EPA Consent Decree RMAP2 Milestones for Category 2 Projects

	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1st QTR 2013	2 nd QTR 2015	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Foster Road – Hooper Road Sewer Area Upgrade	•			Project completed - 4 th quarter 2010.
Zachary Area Transmission Network Improvements Phase I - 3 Pump Stations and Equalization Basin		•		Project completed - 1 st quarter 2013.
Zachary Area Transmission Network Improvements Phase II – Red Mud Lakes Forcemain to NWWTP		•		Project completed – 2 nd quarter 2016.
Zachary Area Transmission Network Improvements Phase III – Forcemain to Highway 964 to Red Mud Lakes		•		Project completed - 4 th quarter 2014.
Zachary Area Transmission Network Improvements Phase IV – Zachary Improvements		•		Project completed - 4 th quarter 2011.
Zachary Area Transmission Network Improvements Phase V – Zachary Improvements			•	Project completed – 1 st quarter 2017.
South Boulevard – St. Joseph Street Sewer Area Upgrades	•			Project completed –2 nd quarter 2012.
South Boulevard – St. Joseph Street Sewer Area Upgrades – Phase B			•	Project completed – 3 rd quarter 2017.
Downtown Area Pump Station Improvements		•		Project completed - 2nd quarter 2012.
Highland Road – Buchanan Street Sewer Area Upgrades	•			Project completed - 4 th quarter 2011.
Citiplace/Essen Area - PS119 & Forcemain Improvements	•			Project completed – 3 rd quarter 2012.
Group Project 1A (Metro Airport Sewer Upgrades)		٠		Project completed - 2 nd quarter 2013.
Group Project 1B (Metro Airport Sewer Area Pump Station & Forcemain Upgrades)		•		Project completed - 1 st quarter 2016.
Perkins/Old Perkins Area - Booster PS 514 Improvements		٠		Project completed - 2 nd quarter 2013.
Group Project 2 (Old Perkins – Highland Road Area Upgrades)	٠			Project completed - 2 nd quarter 2012.
Highland Road – Burbank Drive Capacity Improvements		•		Project completed – 4 th quarter 2016.
Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase A		●		Project completed - 1 st quarter 2012.

Table 3. EPA Consent Decree RMAP2 Milestones for Category 2 Projects

	33% Milestone	66% Milestone	100% Milestone	_
Milestone Date	1st QTR 2013	2 nd QTR 2015	4th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase B		•		Project completed - 1 st quarter 2015.
Bayou Duplantier Area Sewer Upgrades		٠		Project completed - 3 rd quarter 2013.
25th Street - North Acadian Thruway	•			Improvements designed under this project were constructed as part of the Capital Lake-Gayosa Drive Project and the South BlvdSaint Joseph Street Project. Please see status updates for the two projects mentioned in this table above.
Government St - South Acadian Thruway Sewer Area Upgrades			٠	Project completed - 1 st quarter 2016.
Plank Road – Kleinpeter Road Sewer Area Upgrades		٠		Project completed - 1 st quarter 2016.
O'Neal Lane Pipeline Improvements – Group A		•		Project completed - 4th quarter 2014.
O'Neal Lane Pipeline Improvements – Group B		•		Project completed - 2 nd quarter 2015.
Multiple PS - Nicholson Dr - Brightside Dr		•		Project completed - 2 nd quarter 2015.
Pump Station 58 Capacity Improvements		•		Project completed - 1 st quarter 2015.
Staring Lane FM (Phase I - Burbank Drive to Highland Road)	٠			Project completed - 2 nd quarter 2010.
Staring Lane FM (Phase II - Highland road to Perkins Road)		٠		Project completed - 4 th quarter 2013.
Staring Lane FM (Phase III - Perkins to PS58)		٠		Project completed - 3 rd quarter 2014.
Multiple PS - Jefferson Hwy - Park Forest Dr		٠		Project completed - 3 rd quarter 2012.
Airline Highway Pipeline Improvements- Phase A			٠	Project completed - 3 rd quarter 2017.
Airline Highway Pipeline Improvements- Phase B			٠	Project completed – 3 rd quarter 2018.
Multiple PS - Highland Road - Kenilworth Parkway			٠	Project completed – 2 nd quarter 2017.
Florida Boulevard Pump Station Improvements			٠	Project completed – 4 th quarter 2018.
Plank Road Pump Station Improvements			•	Project completed – 1 st quarter 2017.
Multiple PS - Highway 61 - Plank Road			٠	Project completed – 2 nd quarter 2018.

Table 3. EPA Consent Decree RMAP2 Milestones for Category 2 Projects

	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1st QTR 2013	2 nd QTR 2015	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	-
O'Neal Lane Pump Station Improvements – Group A			•	Project completed – 2 nd quarter 2017.
O'Neal Lane Pump Station Improvements – Group B			٠	Project completed – 4 th quarter 2017.
Sherwood Forest Blvd – Goodwood Blvd Pipeline Improvements			٠	Project completed – 1 st quarter 2018.
Joor Road - Greenwell Springs Road Sewer Area Upgrades			٠	Project completed – 3 rd quarter 2018.
Plank Road - Port Hudson Pride Road Sewer Area Upgrades			٠	Project completed - 3 rd quarter 2015.
Highland Road Pipeline Improvements - Group A			٠	Project completed - 3 rd quarter 2016.
Highland Road Pipeline Improvements - Group B			•	Project completed – 2 nd quarter 2017.
Oak Villa Boulevard - Monterrey Boulevard Sewer Area Upgrades			•	Project completed – 2 nd quarter 2017.
Lovett Road – Greenwell Springs Road Sewer Area Upgrades			•	Project completed – 4 th quarter 2018.
Hooper Road Pump Station Improvements			٠	Project completed – 3 rd quarter 2018.
Multiple PS - Prescott Rd - Greenwell Springs Rd			•	Project completed – 4 th quarter 2018.
Multiple PS - Burbank Drive - Siegen Lane			•	Project completed – 4 th quarter 2017.
Pump Station 42 Improvements		•		Project completed - 1 st quarter 2016.
Pump Station 42 Forcemain - Phase I		•		Project complete - 3 rd quarter 2014.
Pump Station 42 Forcemain - Phase II		•		Project complete - 2 nd quarter 2014.
Central Consolidated Pump Stations		•		Project complete - 4 th quarter 2014.
Central Consolidated Forcemains-Phase I		•		Project complete - 3 rd quarter 2013.
Central Consolidated Forcemains-Phase II		•		Project complete - 3 rd quarter 2014.

1.1.2.3 Category 3: Wastewater Treatment and Storage

This category of projects includes improvements at the City/Parish WWTPs, as well as storage facilities throughout the service area. There are not any RMAP2 projects that have been identified at the North WWTP, but several projects were completed by the City/Parish to improve plant performance and odor control. Based on extensive evaluations in the *Draft Wastewater Master Plan* (May 2008), the existing Central WWTP had insufficient flows to justify the cost of

renovation and upgrading for future requirements and was retired when the RMAP2 projects at the South WWTP were completed. Flows predicted for the current central service area were diverted to the South WWTP and adjustments were made in the South WWTP improvements to handle the increased flows.

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

- The Immediate Action Plan (IAP) South WWTP Project included screening, trickling filter recirculation pumping, primary treatment improvements, and bio-solids thickening improvements. Note that this project was made up of three separate projects that were grouped together for ease of execution and construction coordination. Also note that the effluent pumping IAP project has been completed.
- Phase 1 Improvements at the South WWTP for Wet Weather Flow included influent pumping, and screening and grit removal for a predicted flow of 345 million gallons per day (MGD). Phase 1 also included 66 million gallons of equalization storage at the South WWTP.
- Phase 2 Improvements at the South WWTP included wet weather flow treatment with a peak capacity of 205 MGD (as previously approved in the November 2006 RMAP2).

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

- North Choctaw Storage Facility
- North Hooper Storage Facility

These storage projects are part of the transmission system that allows for retaining (storage) of peak wet weather flows and permits that stored flow is later released for treatment at the treatment plant. All projects of this type are completed. The details of the wastewater treatment and storage projects are listed in Table 4 below and are current through December 31, 2020.

Table 4. EPA Consent Decree RMAP2 Milestones for Category 3 Projects

	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1st QTR 2013	2 nd QTR 2015	4th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Choctaw Storage and Pump Station Facility		٠		Project completed – 3 rd quarter 2013.
Hooper Storage Facility		٠		Project completed – 2 nd quarter 2016.
South WWTP IAP (Consolidated – Screening, Primary Treatment, Trickling Filter Recirculation, Sludge Handling)	•			Project completed - 2 nd quarter 2011.
South WWTP IAP (Effluent Pumping Improvements)	•			Project completed - 1 st quarter 2008.
SWWTP Wet Weather Improvements - Phase I		•		Project completed - 2 nd quarter 2013.
SWWTP Wet Weather Improvements - Phase II (PDP portion)		٠		Project completed - 2 nd quarter 2015.

*A project is deemed "Functionally Complete" when a project has been constructed in accordance with the engineering and operation specifications and has been tested to function as required. The definition functionally complete may or may not mean that the asset has been put into service as designed. Further definition can be found within Quarterly Report #56.

BATON ROUGE CONSENT DECREE- 2020 ANNUAL REPORT

1.1.3 Additional Projects Outside of Consent Decree

This category of projects is composed of several additional projects the City/Parish has agreed to implement not presently included/tracked by the RMAP2 Consent Decree Compliance Schedule, and specifically includes wet weather improvements at the City/Parish wastewater treatment plants (WWTPs), as well as storage facilities throughout the service area. Many of these projects will greatly improve the operation and maintenance of the wastewater collection system, WWTPs, and storage facilities. Specifically included in this group of projects are both the SCADA Project and the Standby Power Program, which help optimize the overall operation of the treatment facilities and pump stations, while minimizing risks associated with SSOs. All of these additional projects are summarized below and completed project statuses are provided in Table 5.

As mentioned in the 2017 Annual Report, the North WWTP improvements project was bid as one project-- North WWTP Master Plan & Sustainability Improvements Project. However, bids received for the project were 35% over available funds and therefore value engineering was used to break the project into several projects, all of which are completed, as listed below in Table 5.

	Scheduled Start	Scheduled Finish	Project Status Summary
NWWTP Plantwide & Master SCADA Project	Complete	Complete	Project completed – 4 th quarter 2018.
NWWTP Standby Generator Project	Complete	Complete	Project completed – 4 th quarter 2018.
NWWTP Pretreatment & Grit Removal Rehabilitation Project	Complete	Complete	Project completed – 4 th quarter 2018.
NWWTP General Electrical Rehabilitation Project	Complete	Complete	Project completed – 4 th quarter 2018.
NWWTP Odor Control & Sodium Hypochlorite Project	Complete	Complete	Project completed – 4 th quarter 2018.
North WWTP Sustainability Improvements Project	Complete	Complete	Project completed – 3 rd quarter 2018.
NWWTP Master Plan Project #3 (Public Project) — Plant Buffer	Complete	Complete	Project completed – 3 rd quarter 2018.
SWWTP Wet Weather Improvements – Phase II (Master Plan portion)	Complete	Complete	Project completed – 2 nd quarter 2015.
Sewer System and WWTP Stand-by Power Program	Complete	Complete	Project completed – 4 th quarter 2018.
SCADA (Collection System, Operations Data and Control Center)	Complete	Complete	Project completed – 4 th quarter 2018.
	Complete	Complete	Project completed – 2 nd quarter 2017.
Environmental Services Facility			(DES consolidated staff into one facility to facilitate communications and operations.)
NWWTP Odor Control Project	Complete	Complete	Project completed – 4 th quarter 2010.
Comite –Foster Road Sewer Area Upgrades - Phase II	Complete	Complete	Project completed – 1 st quarter 2011.
Zachary Area Transmission Network Improvements Phase V – Zachary Improvements	Complete	Complete	Project moved into RMAP2. See Table 5 for project status update
South Boulevard – Saint Joseph Street Phase B	Complete	Complete	Project moved into RMAP2. See Table 5 for project status update

Table 5. Proposed Schedule for Projects Outside of Consent Decree

Table 5. Proposed Schedule for Projects Outside of Consent Decree

	Scheduled Start	Scheduled Finish	Project Status Summary
	Complete	Complete	Project completed – 2 nd quarter 2017.
Central WWTP Decommissioning Project			(Central WWTP decommissioned 3 rd quarter 2016; permit discontinued 2 nd quarter 2017.)
Ward Creek Aerial Crossing Replacement Emergency Project	Complete	Complete	Project completed – 3 rd quarter 2015.
South Basin Coordination Project	Complete	Complete	Project completed – 4 th quarter 2016.
South WWTP Landscape Buffer Area	Complete	Complete	Project completed – 2 nd quarter 2016.

1.1.4 Infiltration and Inflow Reduction Activities Summary

Another part of the Collection System Remedial Program identified in the Consent Decree Section XII is capital infiltration/inflow (I/I) reduction activities. Pursuant to item 35 in Section XII, the City/Parish is required to spend at least \$3 million annually for sewer repairs, sewer rehabilitation, and other capital expenditures related to reducing I/I in the North and South WWTP collection systems. The City/Parish spent approximately \$14.5 million; therefore, this goal was exceeded during 2020. The City/Parish was in compliance with Section XII Collection System Remedial Program during this reporting period. There were no problems encountered in the Collection System Remedial Program during this reporting period and non-compliance is not anticipated during the next reporting period. Table 6 identifies the funds expended during 2020 to meet this requirement.

Project	Description	% Complete	Contract Amount	Expenditures 2020
19-MH-UF-0010	Manhole Rehabilitation Contract	100%	\$1,500,000.00	\$1,500,000.00
19-PI-MS-0003	Sewer Physical Inspection Contract	100.1%	\$6,600,000.00	\$6,606,135.00
16-CP-MS-0010	Annual Cured-In-Place Lining Contract	82%	\$1,989,945.00	\$1,634,081.00
17-PN-MS-0016	Supplemental Parishwide Sewer Repair and Replacement Project	68%	\$1,958,625.00	\$1,333,374.46
17-PN-MS-0015	Annual Parishwide Sewer Repair and Replacement Project	42%	\$4,593,505.00	\$1,940,933.63
19-ER-WC-0006	Parishwide Sewer Emergency Repair Contract	38%	\$4,000,000.00	\$1,528,527.16
		TOTAL	\$20,642,075.00	\$14,543,051.25

Table 6. I/I Reduction Activities Summary

1.2 Treatment Facility Assessment

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

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

The City/Parish typically submits Municipal Water Pollution Prevention (MWPP) Environmental Audit Reports for the North and South WWTPs once a year to LDEQ. These reports contain an evaluation and rating for influent loadings, plant performance, overflows and bypasses, treatment plant age, sludge disposal, new development in collection system, and operator certification training for the North and South WWTPs. The MWPP audit rates the treatment plants on the aforementioned factors annually starting and are submitted annually the year following the effective date of NPDES permits. The actions that will be taken to maintain compliance and prevent effluent violations are typically presented in MWPP resolutions, which were last submitted along with the audit on November 13, 2020.

1.3 Environmental Results Monitoring

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

The Phase I Baseline Monitoring was completed during the 2004 reporting period. As of December 31, 2020, the City/Parish conducted three separate Phase II Environmental Results Monitoring events, which are summarized in Attachment C. Also in Attachment C, is the water sample analysis and chain of custody.

During October 8 – 11, 2020 there were over ten (10) inches of rainfall experienced during a 3 – 4 hour period as a result of Hurricane Delta. The Baton Rouge metropolitan area experienced significant impacts from Hurricane Delta, including heavy rainfall, flash flooding, river flooding and strong winds. In response, the Governor of the State of Louisiana issued a statewide state of emergency on October 6, 2020. The force majeure event notification and the governor's proclamation are included in Attachment A. Due to the hazardous weather conditions; it was not possible to conduct a sampling event during this rain event. There were no additional observed rain events during Quarter 4 of 2020 that met the criteria of a minimum of 2-inches of rainfall over a 24-hour period.

1.4 Interim Relief Measures Activities

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

Effluent limits of 85% removal of BOD and TSS have been in effect following the completion of all RMAP construction projects in December 2018.

1.4.1 North WWTP

During 2020, the North WWTP has been in compliance with the 85% effluent limits for BOD for 0 months and for TSS for 6 months of the reporting period, as shown in Table 7a.

Table 7a.	Table 7a. 2020 Monthly Average Percent Removal for North Plant- LA0036439												
	Jan. Feb. Mar. Apr. May June July Aug. Sept. Oct. Nov. Dec.												
BOD	80D 71 80 67 72 74 75 65 63 77 82 52 63										63		
TSS	TSS 80 73 86 85 76 88 82 92 91 90 83 76												

1.4.2 Central WWTP

The Central WWTP had no discharge and the LPDES permit was terminated by LDEQ in July 2017.

1.4.3 South WWTP

During 2020, the South WWTP has been in compliance with the 85% effluent limits for BOD for 7 months and for TSS for 12 months of the reporting period, as shown in Table 7b.

Table 7b	Table 7b. 2020 Monthly Average Percent Removal for South Plant- LA0036412											
	Jan. Feb. Mar. Apr. May June July Aug. Sept. Oct. Nov. Dec.											Dec.
BOD	BOD 82 82 86 86 87 80 79 81 88 91 87 9										95	
TSS	TSS 89 86 91 92 92 91 91 93 94 91 86 92											92

1.5 Outreach and Public Awareness Program

Consent Decree Section XV - Outreach and Public Awareness Plan requires the City/Parish DES to implement and follow the Outreach and Public Awareness Program Plan attached in Exhibit H of the Consent Decree. The Outreach and Public Awareness Program Plan was updated in December 2007 and has been completed and reviewed/approved by the City/Parish, and then submitted in both the 2011 Annual EPA Report and 36th Quarterly EPA Report.

Outreach and Public Awareness Program Plan implementation efforts have been on-going. Public information tools such as the website http://brprojects.com/baton-rouge-sso-program/ are being continuously updated with new information about the program, project information (including quarterly progress reports detailing the status of the projects), regulatory information and associated reference documents, and news articles about the SSO Control and Wastewater Facilities Program, etc. Fact sheets and brochures have also been developed that can be accessed via the website, and have been handed out during the public meetings, that describes pertinent information and aspects about the Program. Additionally, prior to any field work in areas, informational door hangers are also hung on those homes where inspection work will be taking place.

Also the SSO Control and Wastewater Facilities Program Quarterly Progress Reports have been made available and distributed to the public. Until now, they have been, and still are, posted on the website for the public to download at their convenience and are always distributed to City/Parish and DES staff. The plan is for these reports to continue to be distributed to those on the master list and posted on the website; in addition they will also be handed out or mailed to anyone who requests them throughout the duration of the SSO Control and Wastewater Facilities Program.

SSO program communications continued to provide City/Parish residents with time critical information on SSO Control and Wastewater Facility Program projects, educational information on SSOs, and updates on the status of the Program and related projects. In close collaboration with the Office of the Mayor-President and the Department of Environmental Services, the Program has initiated a construction communication outreach component to complement the Program's current communication activities. The Program Communication Team has designed and distributed a variety of outreach materials, as well as association and neighborhood specific information as appropriate. A telephone hotline for residents to call with questions was developed and coordination between the SSO Program and the Parish's 311 call center was established; also, an email account was created to allow residents and other stakeholders to contact the Program. Additionally, materials including information letters and handouts, door hangers announcing road closures, were developed and are continuing to be distributed. The Department of Public Works underwent a reorganization and rebranding, which involved rebranding the organization as the Department of Environmental Services (DES) and redefining their services to the community and their focuses. DES has increased their social media and web presence through multiple platforms to quickly disseminate information. DES has also greatly increased their public outreach and community engagement through working with national media outlets, initiating school outreach programs, developing a Fats, Oils, and Grease (FOG) Pretreatment Program, conducting school recycling competitions, establishing guidelines for tours of wastewater treatment plant and recycling facilities, among other activities.

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

1.6 Plan Modification Needs

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

1.7 Stipulated Penalties

A summary of penalties assessed and paid by the City/Parish and a cumulative summary of penalties assessed and potential stipulated penalties reported in past quarterly reports from 2020 are presented in Tables 8 and 9.

Table 8. Penalties Assessed and Paid by the City/Parish to Date

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

Table 9. Self-Reported Potential Stipulated Penalties 2020

Stipulated Penalties	Number	Cost Per Occurrence	Amount Accrued
Cross-Connection Identified & Non-Compliance with the Cross- Connection Elimination Plan	0	\$2,000 per day	\$0
Unauthorized Discharges 2020			
Less than 1 MG & Non-Compliance with the Collection System Preventative Maintenance Plan	0	\$5,000	\$0
Less than 1 MG & Non-Compliance with the Sanitary Sewer Overflow Response Plan	0	\$5,000	\$0
1 MG or more	5	\$5,000	\$25,000
Non-Compliant Discharges (WWTP) 2020			
Weekly Average Limits	6	\$1,000	\$6,000
Monthly (30-day average) Limits	11	\$2,500	\$27,500
Daily Limits	0	\$1,000	\$0
2020 Total Stipulated Penalties (through December 31, 2020)			\$58,500

Note: None of these self-reported stipulated penalties in this table have been assessed to the City/Parish by the DOJ/EPA/LDEQ or have been paid by the City/Parish at this time. Historical data utilized in this table was taken from the City/Parish Quarterly EPA Reports. In some instances where Preventative Maintenance Plan goals were not achieved in a given quarter, but the cumulative annual goals were exceeded, it was assumed that no penalties should be assessed for unauthorized discharges that occurred during that given quarter.

2020 Annual Report Attachment A

Notice of Force Majeure Event



CERTIFIED- RETURN RECEIPT REQUESTED

DATE: October 29, 2020

TO: Mr. Michael T. Donnellan U.S. Department of Justice 601 D. Street NW Washington, D.C. 20044-7611

> Ms. Mona Tates (6EN) U.S. Environmental Protection Agency, Region 6 1445 Ross Avenue, Suite 1200 Dallas, TX 75202-2733

Dr. Chuck Carr Brown Louisiana Department of Environmental Quality 602 N. Fifth Street Baton Rouge, LA 70802

- FROM: Richard Speer, PE, Environmental Services Director Department of Environmental Services, City of Baton Rouge and Parish of East Baton Rouge
- SUBJECT: City of Baton Rouge and Parish of East Baton Rouge, Consent Decree-Civil Action No. 01-978-B-M3: Force Majeure Event – Hurricane Delta

Ladies and Gentlemen:

In conformance with the Force Majeure provision included in Section XXII – Force Majeure of the Consent Decree, this letter will serve as a formal notification by the City of Baton Rouge and Parish of East Baton Rouge (City/Parish) to the Department of Justice (DOJ), Environmental Protection Agency (EPA), and Louisiana Department of Environmental Quality (LDEQ) that a force majeure event has taken place beginning October 8, 2020 in the form of Hurricane Delta.

A Hurricane Warning was is in effect in Louisiana and included threats of strong gusty winds, coastal flooding, flash flooding, river flooding and heavy rainfall, with the primary impacts occurring from October 8 – 11, 2020. In response, the Governor of the State of Louisiana, John Bel Edwards, ordered and directed a statewide state of emergency (please see Attachment A: Proclamation Number 133 JBE 2020, State of Emergency – Hurricane Delta) as a result of Hurricane Delta. The Governor's order is effective October 6, 2020 until November 4, 2020.

The Baton Rouge metropolitan area experienced significant impacts from Hurricane Delta, including over ten (10) inches of rainfall in a 3 – 4 hour period and sustained wind speeds of over fifty (50) miles per hour, resulting in flooding and loss of power to over 90,000 customers. The rainfall received far exceeds the 2 year, 12 hour design storm for which the system was designed. Over 130 pump station sites were on generator power at the peak of the event. Unstable power conditions affected several pump station sites causing pump motor and variable frequency drive (VFD) faults. Upon notification of the faults, SCADA dispatched personnel to manually reset the electrical equipment. Response times were adversely affected by weather conditions resulting in 19 sanitary sewer overflows at pump station sites. The approved SSO response plan was implemented and all sites were cleaned accordingly.

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

Richard Speer, PE Environmental Services Director

Robert Abbott

Senior Special Parish Attorney

Cc: Honorable Sharon Weston Broome, Mayor-President Samuel Coleman, PE, Acting Regional Administrator (Region 6) Adam M. Smith, PE, DES Chief of Wastewater Operations and Maintenance Carlos Zequeira Brinsfield, US EPA (6RC) Darlene Whitten-Hill US EPA (6EN) Ted Broyles, LDEQ Joseph Young, PE, Program Manager, Jacobs

PROCLAMATION NUMBER 133 JBE 2020, STATE OF EMERGENCY -HURRICANE DELTA



EXECUTIVE DEPARTMENT

PROCLAMATION NUMBER 133 JBE 2020

STATE OF EMERGENCY – HURRICANE DELTA

- WHEREAS, the Louisiana Homeland Security and Emergency Assistance and Disaster Act, La. R.S. 29:721, *et seq.*, confers upon the Governor of the State of Louisiana emergency powers to deal with emergencies and disasters, including those caused by fire, flood, earthquake or other natural or manmade causes, in order to ensure that preparations of this State will be adequate to deal with such emergencies or disasters and to preserve the lives and property of the people of the State of Louisiana;
- WHEREAS, when the Governor determines that a disaster or emergency has occurred, or the threat thereof is imminent, La. R.S. 29:724(B)(l) empowers him to declare a state of emergency by executive order or proclamation, or both;
- WHEREAS, the National Weather Service has indicated that Hurricane Delta, which is currently located in the West Central Caribbean, will continue to move and strengthen into a major hurricane before entering into the southern Gulf of Mexico late Tuesday or early Wednesday. The storm will continue to move northwest and eventually move towards the north impacting parts of the Gulf Coast;
- WHEREAS, the National Weather Service also indicates that Hurricane Delta is projected to make landfall as a category 1 or 2 hurricane on Friday along the Louisiana Coast;
- WHEREAS, Hurricane Delta will put southeast Louisiana at risk for flash flooding and river flooding through Friday. Significant storm surge is expected across the Texas, Louisiana, and Mississippi coasts;
- WHEREAS, due to the tropical nature of this system, there is a potential for storm surge, high and damaging winds, and flooding from rainfall in all coastal parishes, but especially for those parishes east of where Hurricane Delta makes landfall;
- WHEREAS, many parishes along the coast will need to take protective measures to help mitigate flooding and wind damage in response to this imminent threat; and
- WHEREAS, the State anticipates that coastal parishes will declare states of emergency, and assistance may be needed to assist parishes in their response to this developing threat.

NOW THEREFORE, I, JOHN BEL EDWARDS, Governor of the State of Louisiana, by virtue of the authority vested by the Constitution and the laws of the State of Louisiana, do hereby order and direct as follows:

SECTION 1: Pursuant to the Louisiana Homeland Security and Emergency Assistance and Disaster Act, La. R.S. 29:721, *et seq.*, a state of emergency is hereby declared to exist statewide in the State of Louisiana as a result of the imminent threat of emergency conditions that threaten the lives and property of the citizens of the State.

- **SECTION 2:** The Director of the Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) is hereby authorized to undertake any activity authorized by law which he deems appropriate in response to this declaration.
- **SECTION 3:** Pursuant to La. R.S. 29:732, during a declared state of emergency, the prices charged or value received for goods and services sold within the designated emergency area may not exceed the prices ordinarily charged for comparable goods and services in the same market area at or immediately before the time of the state of emergency, unless the price by the seller is attributable to fluctuations in applicable commodity markets, fluctuations in applicable regional or national market trends, or to reasonable expenses and charges and attendant business risk incurred in procuring or selling the goods or services during the state of emergency.
- **SECTION 4:** All departments, commissions, boards, agencies and officers of the State, or any political subdivision thereof, are authorized and directed to cooperate in actions the State may take in response to the effects of this severe weather event.
- SECTIONS 5: This order is effective upon signature and shall remain in effect from Tuesday, October 6, 2020 to Wednesday, November 4, 2020, unless terminated sooner.



IN WITNESS WHEREOF, I have set my hand officially and caused to be affixed the Great Seal of Louisiana in the City of Baton Rouge, on this 6th day of October, 2020.

OVERNOR OF LOUISIANA

ATTEST BY THE SECRETARY OF STATE

SECRETARY OF STATE

2020 Annual Report Attachment B

Municipal Water Pollution Prevention Environmental Audit Reports

LOUISIANA MUNICIPAL WATER POLLUTION PREVENTION MWPP	HELLAN DEQ LOUISIANA
Facility Name:	City of Baton Rouge / Parish of East Baton Rouge / North Wastewater Treatment Plant
LPDES Permit Number:	LA0036439
Agency Interest (AI) Number:	4843
Address:	50 Woodpecker Street
	Baton Rouge, LA 70807
Parish:	East Baton Rouge
(Person Completing Form) Name:	Department of Environmental Services Staff
Title:	Inclusive
Date Completed:	November 13, 2020

INSTRUCTIONS

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

1

		Per	mit #:	LA(0036439
PART I: INF	LUENT FLOY	W/LOADINGS	i (all pl	ants)	
A. List the averag the last reporting		c flows and BOD load	ings receiv	ed at your	facility during
Column 1 Average Monthly Flow (million gallons per day, MGD)		Column 2 Average Monthly BOD5 Concentration (mg/l)			Column 3 Average Monthly BOD5 Loading (pounds per day, lb/da
17.18	x	93	x 8.	34 =	13,325
20.92	X	78	x 8.	34 =	13,609
18.55	X	139	x 8.	34 =	21,504
24.58	X	73	x 8.	34 =	14,965
34.02	x	67	x 8.	34 =	19,010
41.11	x	50	x 8.	34 =	17,143
23.46	x	78	x 8.	34 =	15,261
19.82	x	82	x 8.	34 =	13,554
23.53	х	52	x 8.	34 =	10,204
31.19	х	48	x 8.	34 =	12,486
33.73	x	39	x 8.	34 =	10,971

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

51

X

25.30

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

Design Flow, MGD:	54	x 0.90 =	48.60
Design BOD, lb/day:	75,210	x 0.90 =	67,689

x 8.34 =

10,761

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

Permit #:

months points	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12	
points	\bigcirc	0	0	0	0	5	5	5	5	5	5	5	5	
					Write	e 0 or 5	in the	C poir	nt total	box	0	C Poir	nt Total	

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

months points	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
points	\bigcirc	5	5	10	10	15	15	15	15	15	15	15	15
				Write	0, 5, 10	0 or 15	in the	D poir	nt total	box	0	D Poi	nt Total

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

months points	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
points	\bigcirc	0	5	5	5	10	10	10	10	10	10	10	10

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

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

months	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
months points	\bigcirc	10	20	30	40	50	50	50	50	50	50	50	50

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

F Point Total

0

E Point Total

LA0036439

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

TOTAL POINT VALUE FOR PART 1: 0 (max = 80)

Also enter this value or 80, whichever is less, on the point calculation table on page 16.
PART 2: EFFLUENT QUALITY / PLANT PERFORMANCE

Permit #:

LA0036439

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

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
SEPTEMBER	16	12
OCTOBER	21	21
NOVEMBER	17	17
DECEMBER	12	18
JANUARY	19	20
FEBRUARY	10	15
MARCH	19	18
APRIL	20	16
MAY	16	18
JUNE	17	13
JULY	16	15
AUGUST	19	11

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

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

C. Continuous Discharge to Surface Water.

at the right.

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

Permit #:

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

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

0 ii Point Total

iii Point Total

0

LA0036439

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

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

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

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

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

TOTAL POINT VALUE FOR PART 2: 0

(max = 100)

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

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

√ Check one bo	ox. 🗹 Yes	No No	If Yes,	Please describe:	
Fecal Coliform					
09/17-23/19	410 col./100ml		02/09-15/20	1027 col./100ml	
10/01-07/19	600 col./100ml		03/15-21/20	757 col./100ml	
10/08-14/19	533 col./100ml				
10/15-21/19	946 col./100ml				
12/29-01/04/20	448 col./100ml				

Permit #:

LA0036439

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

\vee Check one box.	Yes	No	If Yes, Please describe:	

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

 \vee Check one box. \checkmark Yes \square No If Yes, Please describe:

See Attachment	1 & 2			

D. Other Monitoring and Limitations iii.

NWWTP - LA0036439 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
11/4-5/2019	Mercury	0.0005 μg/L	0.064 μg/L
	Nickel	5 μg/L	11 μg/L
	Copper	3 μg/L	16 μg/L
	Phenolics	5 μg/L	207 μg/L
	Heptachlor	0.01 µg/L	0.147 μg/L
	Zinc	20 µg/L	87 μg/L

*1/6 months

NWWTP - LA0036439 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
11/5-6/2019	Copper	3 μg/L	5 μg/L
	Mercury	0.0005 μg/L	0.022 μg/L
	Nickel	5 μg/L	6 μg/L
	Zinc	20 µg/L	28 μg/L
	Phenolics	5 μg/L	10 μg/L

*1/6 months

D. Other Monitoring and Limitations iii.

NWWTP - LA0036439 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
06/15-16/2020	Copper	3 μg/L	22 μg/L
	Nickel	5 μg/L	7 μg/L
	Phenolics	5 μg/L	87 μg/ L
	Zinc	20 µg/L	86 μg/L
	Mercury	0.0005 µg/L	0.0284 μg/L

*1/6 months

1000

NWWTP - LA0036439 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
06/16-17/2020	Copper	3 μg/L	10 µg/L
	Zinc	20 µg/L	30 μg/L
	Mercury	0.0005 μg/L	0.007 μg/L
	Phenolics	5 μg/L	12 μg/L

*1/6 months

Attachment 2

Permit #: LA0036439

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

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

	2018		
Current Year	Answer to A	=	Age in years
2020	 2018		2

Enter Age in Part C below.

B. $\sqrt{}$ Check the type of treatment facility that is employed.

		FACTOR:
\checkmark	Mechanical Treatment Plant (trickling filter, activated sludge, etc) Specify Type: <u>Trickling Filter</u>	2.5
	Aerated Lagoon	2.0
	Stabilization Pond	1.5
	Other Specify Type:	1.0

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

TOTAL POINT VALUE FOR PART 3 =



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

D. Please attach a schematic of the treatment plant.

* See Attachment



	Permit #: LA0036439
PA	RT 4: OVERFLOWS AND BYPASSES
А. i.	List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain:
	discharge of untreated or incompletely treated wastewater due to <u>heavy rain</u> :
ii.	List the number of bypasses, overflows or unpermitted discharges shown in A (i) that were within the collection system and the number at the treatment plant
	Collection System: 3 Treatment Plant: 11
B. i.	List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to <u>equipment failure</u> , either at the treatment plant or due to pumping problems in the collection system:
ii.	List the number of bypasses, overflows or unpermitted discharges shown in B (i) that were within the collection system and the number at the treatment plant
	Collection System: 109 Treatment Plant: 10
C.	Specify whether the bypasses came from the city/village/town sewer system or from contract or tributary communities/sanitary districts, etc
D.	Add the point values checked for A and B and place the total in the box below.
	TOTAL POINT VALUE FOR PART 4: 100 (max = 100) Also enter this value or 100, whichever is less, on the point calculation table on page 16.
E.	List the person responsible (name and title) for reporting overflows, bypasses or unpermitted discharges to State and Federal authorities:
	Michael Lowe, Wastewater Laboratory Supervisor
	Describe the procedure for gathering, compiling and reporting:
	The procedure for gathering, compiling, and reporting is specified in the permit.
	8

Permit #: LA0036439

6

0

PART 5: SEWAGE SLUDGE STORAGE, USE, AND DISPOSAL

A. Sewage Sludge Storage

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

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



Write 0, 10, 20, 30 or 50 in the A point total box

- 50 A Point Total
- **B.** For how many months does your facility have approval to use or dispose of sewage sludge at a properly permitted landfill, land application site, or sewage sludge incinerator?

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



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

TOTAL POINT VALUE FOR PART 5:

50 (max = 100)

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

		×	Permit #:	LA0036439		
PA	RT 6: NEW DEVE	LOPMENT				
A.	Please provide the follo were installed during the		or the total of all	sewer line extensions which		
	Design Population:	180 cap				
	Design Flow:	0.08	MGD			
	Design BOD:	200	mg/l			
В.	Has an industry (or other development) moved into the community or expanded production in the past year, such that either flow or pollutant loadings to the sewerage system were significantly increased (5% or greater)?					
	\checkmark Check one box.	Yes = 15	points	No $= 0$ points		
	If Yes, Please describe:					
	List any new pollutants					
C.	Is there any developme 2-3 years, such that eith significantly increase? √ Check one box. If Yes, Please describe:	er flow or pollutan \Box Yes = 15	t loadings to the s	tial) anticipated in the next sewerage system could No = 0 points		
	List any new pollutants	you anticipate:				
D.	Add together the point	value checked in B	and C and place	the sum in the box below.		
		TOTAL POIN	T VALUE FOR	PART 6: 0 (max = 30)		
	Also enter this valu	e or 30, whichever 1		int calculation table on page 16.		

	09-01-201	09-01-2019 to 08-31-2020	0		
Project Name	# of Lots	# of Lots Design Pop. Flow (gpm) Flow (MGD)	Flow (gpm)		Sewer Length (ft)
The Reserve in Zachary, Sewer Improvements (SD-2	45	180	54	0.08	50
TOTAL	45	180	54	0.08	50

			Permit #:	LA0036439
PA	RT 7: OPERATOR C	ERTIFICAT	ION ANE	EDUCATION
A.	What was the name of the o	perator-in-charge	for the report	ing year?
		Name:	Clay Va	nveckhoven
B.	What is his or her certification	ion number: Cert.#:		7639
C.	What level of certification i wastewater treatment facilit			
D.	What is the level of certification	ation of the operate	or-in-charge?	
		Level Certified:	Wastewate	r Treatment IV
E.	Was the operator-in-charge required in order to operate		certified at le	ast at the grade level
-	$\sqrt{\text{Check one box.}}$	\checkmark Yes = 0 point	ts	\Box No = 50 points
	Write 0	or 50 in the E poin	it total box	0 E Point Total
F.	Has the operator-in-charge r year?	maintained recertif	ication requi	rements during the reporting
	\checkmark Check one box.	V Yes		No
G.	How many hours of continu last two calendar years?	ing education has	the operator-i	n-charge completed over the
	$\sqrt{\text{Check one box.}}$	\checkmark > 12 hours =	0 points	\bigcirc < 12 hours = 50 points
	Write 0 d	or 50 in the G poin	t total box	0 G Point Total
H.	Is there a written policy regater treatment plant employees?	arding continuing o	education an	training for wastewater
	\vee Check one box.	Yes		No
	Explain: 16 hours of	f continuing educ	cation within	n a two year period
I.	What percentage of the cont paid for: By the permittee?	1 8 1		e operator-in-charge were ator?0%
J.	Add together the E and G po	pint values and pla	ce the sum in	the box below at the right.
		FOTAL POINT V 00, whichever is le 11		PART 7: 0 (max = 100) int calculation table on page 16.

Permit #:	LA0036439
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PART 8: FINANCIAL STATUS

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

$\sqrt{\text{Check one box.}}$	Yes	X No	If No, How are O&M costs financed?
--------------------------------	-----	------	------------------------------------

No, sewer user fee revenues alone are not sufficient to cover O&M expenses. The City-Parish has two sources of revenue for sewer, the sewer user fee, and a one-half of one percent sales and use tax dedicated to sewer. 65% of the revenue base is from the sewer user fee and 35% from the sewer sales tax.

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

See A above. The City-Parish has financed it's sewer construction needs through the issuance of sewer revenue bonds and any funding that remains after O&M and debt services requirements are met.

Permit #: LA0036439

PART 9: SUBJECTIVE EVALUATION

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

See Attachment

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

See Attachment

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

See Attachment

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

- i. Do you have duckweed buildup in the ponds?
- ii. Do you mow the dikes regularly (at least monthly), to the waters edge?
- iii. Do you have bushes or trees growing on the dikes or in the ponds?
- iv. Do you have excess sludge buildup (> 1foot) on the bottom of any of your ponds?
- v. Do you exercise all of your valves?
- vi. Are your control manholes in good structural shape?
- vii. Do you maintain at least 3 feet of freeboard in all of your ponds?
- viii. Do you visit your pond system at least weekly?

Yes	No
Yes	No
Yes	No
Yes Yes Yes	 No No No
Yes Yes	No No

 \sqrt{Check} one box.

LA0036439 NORTH WASTEWATER PLANT BASIN MONITORING PERIOD - September 1, 2019 thru August 31, 2020 LA MWPP Environmental Audit Part 9:

Subjective Evaluation

A1. The City-Parish has continued an aggressive physical inspection and preventative maintenance program on the sewer system. Currently, the City-Parish is on an approximate 8-year rotation for the physical inspection of the collection system, which includes, pipeline cleaning, televising, and smoke testing, and manhole inspection. Additionally, the City-Parish has implemented a grease and root treatment for areas subject to dense tree canopy and high-impact fats, oils and grease (FOG) contributors.

Additionally, the City-Parish maintains multiple annual contracts to complete point repairs, emergency point repairs, cured-in-place lining manhole rehabilitation, valve maintenance and remove and replace for existing pipelines. A summary of the activities is included in the table below.

	SEPT.				JUL/AUG	
Gravity Collection System	2019	Q4 2019	Q1 2020	Q2 2020	2020	Total
Lines Cleaned (ft)	10,929	17,236	30,269	70,433	10,012	138,879
CCTV Inspected (ft)	20,792	34,603	9,601	18,785	15,376	99,157
Smoke Tested (ft)	18,375	15,600	65,503	28,834	7,680	135,992
Smoke Tested (no. of locations)	0	0	0	69	53	122
Dye Water Flooded (no. of locations)	13	23	90	65	43	234
Manholes Inspected (no.)	6	29	0	1	0	36
Lines Repaired (no.)	48	58	26	51	89	272
Manholes Rehabilitated (no.)	1	160	407	242	122	932
Force Mains						
Visual Surface Inspection (Miles)	4	5	1.8	1	8.8	21
Repaired (no.)	0	0	0	2	0	2
Air Release Valves						
Inspected / Maintained	11	25	9	7	44	96
Repaired (no.)	6	8	1	2	1	18

Note: September 2019 and July/August 2020 data provided as a weighted average based on the quarterly data, as individual month data is not available.

A2. The City-Parish maintains a routine pump station preventative maintenance and reactive maintenance program. The pump station staff and contractors are responsible for visits to pump stations for general observations and preventative maintenance and completing repairs to pump stations, identified through site visits, SCADA, and/or public notifications. A summary of the activities is included in the table below.

Pump & Lift Stations	SEPT. 2019	Q4 2019	Q1 2020	Q2 2020	JUL/AUG 2020	Total
Inspections (no.)	95	176	478	1,056	570	2,375
Wet Wells Cleaned	39	85	112	108	39	383
Repaired (no.)	6	16	13	13	13	61

Note: September 2019 and July/August 2020 data provided as a weighted average based on the quarterly data, as individual month data is not available.

A3. The City-Parish recently completed a \$1.25 billion capital improvements program to improve conveyance, pumping, and treatment capacities and rehabilitate existing system assets.

The City-Parish continues planning, engineering, and construction efforts to continually improve system operation and efficiency. This includes routine collection system rehabilitation through the point repairs, cured-in-place pipe lining, and remove and replace of existing damage pipelines. Additionally, multiple projects are ongoing, in either planning, design, or construction to rehabilitate, improve capacity, and/or expand the collection system. This includes the lining of critical large diameter gravity pipeline infrastructure, improvement to multiple pump stations, the installation of gravity systems to collect septic effluent, and the expansion of the system to accommodate critical healthcare infrastructure.

The City-Parish has begun the prioritizing and planning of a 1-year and 5-year CIP in the to address infrastructure not addressed in other capital projects.

	Permit #: LA0036439
c.	Treatment Plants
i.	Have the influent and effluent flow meters been calibrated in the last year?
	\checkmark Yes \square No (\checkmark Check one box.)
	04-01-202004-01-2020Influent flow meter calibration date(s)Effluent flow meter calibration date(s)
ii.	What problems, if any, have been experienced over the last year that have threatened treatment?
	Primary basins 5/6 were out of service due to flight drives that required replacement. Trickling filters were out of service due to construction.
iii.	Is your community presently involved in formal planning for treatment facility upgrade? \checkmark Check one box. \square Yes \checkmark No If Yes, Please describe:

	Permit #: LA0036439					
D.	Preventive Maintenance					
i.	Does your plant have a written plan for preventive maintenance on major equipment items?					
	$\sqrt{\text{Check one box.}}$ X Yes No If Yes, Please describe:					
	Weekly, monthly and semi-annually preventive maintenance sheets that reflect type and frequency as specified in the O&M manuals. A computerizd maintenance management system manages the preventive maintenance of plant equipment and spare parts.					
ii.	Does this preventive maintenance program depict frequency of intervals, types of lubrication and other preventive maintenance tasks necessary for each piece of equipment?					
iii.	Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assured properly?					
	X Yes No					
E.	Sewer Use Ordinance					
i.	Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS or pH) or toxic substances to the sewer system from industries, commercial users and residences?					
	\vee Check one box. X Yes No If Yes, Please describe:					
	Sewer User Fee Ordinance (No. 7853) limits the discharge of BOD & TSS to 200 mg/l and 250 mg/l respectively. Any discharge above these limits is surcharged at a rate of 2% of the monthly sewer user fee for each limit of 10 mg/l. Pretreatment Ordinance (No. 16120) limits the discharge of heavy metals, chemical and toxic substances.					
ii.	Has it been necessary to enforce?					
	\vee Check one box. X Yes No If Yes, Please describe:					
	The Sewer User Fee Ordinance is strictly enforced by the City Parish and self monitoring sampling. The same apply to the Pretreatment Ordinance. Enforcement mechanisms include discharge permits, surcharges, letter of violations, administrative orders, water termination, and fines.					
iii.	Any additional comments about your treatment plant or collection system? (Attach additional sheets if necessary.)					
	NO					

Permit #: LA0036439

POINT CALCULATION TABLE

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

TOTAL POINTS:

155

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

 Resolved that the village/town/city of Baton Rouge
 informs the

 Louisiana Department of Environmental Quality that the following actions were taken by
 Metropolitan Council (governing body).

- 1. Resolved the Municipal Water Pollution Prevention Environmental Audit Report which is attached to this resolution.
- Set forth the following actions necessary to maintain permit requirements contained in the Louisiana Pollution Discharge Elimination System (LPDES) permit, number LA_0036439 AI # 4843____.

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

a. Currently, we are operating under a consent decree which became effective March 14, 2002.

- b.
- c.
- d.

etc..

Passed by a majority/unanimous (circle one) vote of the Metropolitan Council on December 9, 202(date).

ADOPTED EAST BATON ROUGE SEWAGE

By Introduction PH

COMMISSION

DEC 09 2020

ADOPTED METROPOLITAN COUNCIL

DEC 0 9 2020

20-01419

COUNCIL ADMINSTRATOR TREASURER

COUNCIL ADMINISTRATOR TREASURER 55341 RESOLUTION

EBROSCO RESOLUTION 8525

AUTHORIZING THE MAYOR-PRESIDENT AND/OR EBROSCO TO APPROVE THE SUBMITTAL OF THE LOUISIANA MUNICIPAL WATER POLLUTION PREVENTION (MWPP) ENVIRONMENTAL AUDIT FOR THE NORTH TREATMENT PLANT (LA0036439 AI#4843) TO THE LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ) FOR THE MONITORING PERIOD OF SEPTEMBER 1, 2019 THROUGH AUGUST 31, 2020.

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 $(\mbox{EBROSCO})\,,$ acting as the Authority for $\mbox{EBROSCO},$ that:

Section 1. The Mayor-President, on behalf of the City of Baton Rouge and Parish of East Baton Rouge, and/or the East Baton Rouge Sewerage Commission, represented by President of said Commission, are hereby authorized to approve the submittal of the Louisiana Municipal Water Pollution Prevention (MWPP) Environmental Audit for the North Treatment Plant (LA0036439 AI#4843) to the Louisiana Department of Environmental Quality (LDEQ) for the monitoring period of September 1, 2019 through August 31, 2020.

Section 2. Said agreement shall be approved by the Office of the Parish Attorney as to form and legality.

THE DEC
City of Baton Rouge / Parish of East Baton Rouge / South Wastewater Treatment Plant
LA0036412
4841
2850 Gardere Lane
Baton Rouge, LA 70820
East Baton Rouge
Department of Environmental Services Staff
Inclusive
November 13, 2020

INSTRUCTIONS

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

Permit #:

LA0036412

PART 1: INFLUENT FLOW/LOADINGS (all plants)

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

Column 1 Average Monthly

Flow (million gallons per day, MGD)

Column 2 Average Monthly BOD5 Concentration (mg/l) Column 3 Average Monthly BOD5 Loading (pounds per day, lb/day)

88
the second s
59
22
80
58
46
28
89
59
41
03
90

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

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

Design Flow, MGD:	58	x 0.90 =	52.20	
Design BOD, lb/day:	100,129	x 0.90 =	90,116	

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

Permit #:

LA0036412

months	0	1	2	3	4	5	6	7	8	9	10	11	12
months points	0	0	0	\bigcirc	0	5	5	5	5	5	5	5	5
					Write	e 0 or 5	in the	C poir	nt total	box	0	C Poir	nt Total

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

months points	0	1	$\binom{2}{2}$	3	4	5	6	7	8	9	10	11	12
points	0	5	5	10	10	15	15	15	15	15	15	15	15
				Write	0, 5, 10) or 15	in the	D poir	nt total	box	5	D Poir	nt Total

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

months	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
months points	\bigcirc	0	5	5	5	10	10	10	10	10	10	10	10

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

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

months	$\begin{pmatrix} 0 \end{pmatrix}$	1	2	3	4	5	6	7	8	9	10	11	12
months points	\bigcirc	10	20	30	40	50	50	50	50	50	50	50	50

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

F Point Total

(max = 80)

0

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

TOTAL POINT VALUE FOR PART 1: 5

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

PART 2: EFFLUENT QUALITY / PLANT PERFORMANCE

Permit #:

LA0036412

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

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
SEPTEMBER	10	11
OCTOBER	12	12
NOVEMBER	13	15
DECEMBER	9	14
JANUARY	9	11
FEBRUARY	11	18
MARCH	12	14
APRIL	12	11
MAY	9	12
JUNE	13	12
JULY	10	10
AUGUST	13	10

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



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

months points	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
points	\bigcirc	0	10	20	30	40	40	40	40	40	40	40	40
			Wri	te 0, 1	0, 20, 3	30 or 4	0 in the	e i poir	nt total	box	0	i Poin	t Total

Permit #:

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

months	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
months points	\bigcirc	5	5	10	10	10	10	10	10	10	10	10	10

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

ii Point Total

LA0036412

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

months points	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
points	\bigcirc	0	10	20	30	40	40	40	40	40	40	40	40

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

iii Point Total

0

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

months	\bigcirc	1	2	3	4	5	6	7	8	9	10	11	12
months points	0	5	5	10	10	10	10	10	10	10	10	10	10
				11/1-	ita 0 5	or 10	in the	iu noi	at total	how] p.:	nt Total
				VV I	ne 0, 5	, or 10	in the	iv poli	it total	DOX	0	IV POL	nt I otal

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

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

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

	Permit #: LA0036412
D.	Other Monitoring and Limitations
i.	At any time in the past year was there and exceedance of a permit limit for other pollutants such as: ammonia-nitrogen, phosphorus, pH, total residual chlorine, or fecal coliform?
	√ Check one box. Yes No If Yes, Please describe:
	FECAL TRC 8/20-26/19 687 col./100mL 11-13-19 - 1.33 2/9-15/20 1000 col./100mL 2/16-22/20 2/16-22/20 655 col./100mL 7/12-18/20
ii.	At any time in the past year was there a "failure" of a Biomonitoring (Whole Effluent Toxicity) test of the effluent?
	√ Check one box. Yes Yes If Yes, Please describe:
iii.	At any time in the past year was there an exceedance of a permit limit for a toxic substance?
	\vee Check one box. Yes \square No If Yes, Please describe:
	See Attachment 1 & 2

D. Other Monitoring and Limitations iii.

SWWTP - LA0036412 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
11/4-5/2019	Copper	3 μg/L	15 μg/L
	Zinc	20 μg/L	91 μg/L
	Lead	2 μg/L	2.26 μg/L
	Phenolics	5 μg/L	47 μg/L
	Heptachlor	0.01 μg/L	0.186 μg/L
_	Mercury	0.0005 μg/L	0.0479 μg/L

*1/6 months

SWWTP - LA0036412 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
11/5-6/2019	Mercury	0.0005 μg/L	0.0141 μg/L
	Phenolics	5 μg/L	6 μg/L

*1/6 months

D. Other Monitoring and Limitations iii.

SWWTP - LA0036412 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
06/15-16/2020	Copper	3 μg/L	20 µg/L
	Mercury	0.0005 μg/L	0.023 μg/L
	Phenolics	5 μg/L	34 μg/L
	Zinc	20 µg/L	63 µg/L

*1/6 months

SWWTP - LA0036421 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
06/16-17/2020	Copper	3 μg/L	8 μg/L
	Mercury	0.0005 µg/L	0.0086 µg/L
_	Phenolics	5 μg/L	7 μg/L

*1/6 months

Attachment 2

Permit #:

LA0036412

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

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

	2015		
Current Year	 Answer to A	=	Age in years
2020	2015		5

Enter Age in Part C below.

B. $\sqrt{}$ Check the type of treatment facility that is employed.

<u> </u>	Mechanical Treatmen (trickling filter, activa		FACTOR: (2.5)
	sludge, etc) Specify Type:	Trickling Filter and Activated Sludge	
	Aerated Lagoon		2.0
	Stabilization Pond		1.5
	Other Specify Type:		1.0

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

TOTAL POINT VALUE FOR PART 3 =

$$\frac{2.5}{Factor} \times \frac{5}{Age} = 12.5 \quad (max = 50)$$

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

- **D.** Please attach a schematic of the treatment plant.
 - * See attachment



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	Permit #:	LA0036412
PA	RT 4: OVERFLOWS AND BYPASSES	
A. i.	List the number of times in the last year there was an overfl discharge of untreated or incompletely treated wastewater of	low, bypass or unpermitted lue to <u>heavy rain:</u>
	<u>18</u> \checkmark Check one box. $0 = 0$ points 1 = 5 points 2 = 10 points	3 = 15 points $ 4 = 30 points $ $ 5 or more = 50 points$
ii.	List the number of bypasses, overflows or unpermitted disc were within the collection system and the number at the tree	harges shown in A (i) that atment plant
	Collection System: 18 Trea	tment Plant: 0
B. i.	List the number of times in the last year there was an overfl discharge of untreated or incompletely treated wastewater of either at the treatment plant or due to pumping problems in	lue to equipment failure, the collection system:
	<u>332</u> \lor Check one box. $\bigcirc 0 = 0$ points $\bigcirc 1 = 5$ points $\bigcirc 2 = 10$ points	3 = 15 points $4 = 30 points$ $5 or more = 50 points$
ii.	List the number of bypasses, overflows or unpermitted disc were within the collection system and the number at the treat	narges snown in B (1) that
	Collection System: 331 Trea	tment Plant:1
C.	Specify whether the bypasses came from the city/village/tow contract or tributary communities/sanitary districts, etc	vn sewer system or from
D.	Add the point values checked for A and B and place the tota	al in the box below.
	TOTAL POINT VALUE FOR Also enter this value or 100, whichever is less, on the point	
E.	List the person responsible (name and title) for reporting ov unpermitted discharges to State and Federal authorities:	erflows, bypasses or
	Michael Lowe, Wastewater Laboratory Supervisor	
	Describe the procedure for gathering, compiling and reporting	ng:
	The procedure for gathering, compiling, and reportin	g is specified in the permit.

Permit #: LA0036412

6

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PART 5: SEWAGE SLUDGE STORAGE, USE, AND DISPOSAL

A. Sewage Sludge Storage

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

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

months 2 2 3 4-5 points 50 30 20 10

Write 0, 10, 20, 30 or 50 in the A point total box

50 A Point Total

B. For how many months does your facility have approval to use or dispose of sewage sludge at a properly permitted landfill, land application site, or sewage sludge incinerator?

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

months	<6	6-11	12-23	24-35	(36)
points	50	30	20	10	0

Write 0, 10, 20, 30 or 50 in the B point total box

B Point Total

0

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

TOTAL POINT VALUE FOR PART 5:

50 $(\max = 100)$

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

			Permit #:	LA0036412	
PAI	T 6: NEW DEVELC	PMENT	-		
A.	Please provide the followin were installed during the la		the total of all	sewer line extensions which	
	Design Population:	1,860 cap	_		
	Design Flow:	1.57	MGD		
	Design BOD:	200	mg/l		
B.		either flow or pollu		munity or expanded production the sewerage system were	
	\sqrt{Check} one box.	Yes = 15 po	ints 🔽 Ì	No $= 0$ points	
	If Yes, Please describe:				
	List any new pollutants:				
C.	Is there any development (i 2-3 years, such that either f significantly increase?				
	√ Check one box.	Yes = 15 po	ints 🔽 N	No = 0 points	
	If Yes, Please describe:				
	List any new pollutants you	u anticipate:		-	
D.	Add together the point valu	ue checked in B an	d C and place t	he sum in the box below.	
		TOTAL POINT	VALUE FOR	PART 6: 0 (max = 30)	
	Also enter this value or	r 30, whichever is 10	less, on the poin	nt calculation table on page 16.	
0-60	09-01-2019 to 08-31-2020	3-31-2020			
------	--------------------------	-----------------------	------------	------------	-------------------
	# of Lots	# of Lots Design Pop.	Flow (gpm)	Flow (MGD)	Sewer Length (ft)
	4	16	5	0.01	110
	108	432	131	0.19	2,669
	14	56	17	0.02	477
	72	288	87	0.13	2,558
	6	36	11	0.02	292
	45	180	54	0.08	2,754
	14	56	17	0.02	335
	11	44	13	0.02	443
	4	16	5	0.01	0 4 new servi
	9	24	2	0.01	353
	5	0	514	0.74	2,543
	1	0	12	0.02	268
	32	128	39	0.06	926
	42	168	51	0.07	1,305
	39	156	47	0.07	1,435
	65	260	79	0.11	1,497
	471	1,860	1,089	1.57	22,965

ew services

	Permit #: LA0036412
PA	RT 7: OPERATOR CERTIFICATION AND EDUCATION
A.	What was the name of the operator-in-charge for the reporting year?
74.	Name: Gregory Lewis
B.	What is his or her certification number:
D.	<i>Cert.#:</i> 11419
C.	What level of certification is the operator-in-charge required to have to operate the wastewater treatment facility? Level Required: Wastewater Treatment IV
D.	
р.	What is the level of certification of the operator-in-charge?
F	Level Certified: Wastewater Treatment IV
E.	Was the operator-in-charge of the report year certified at least at the grade level required in order to operate this plant?
	$\sqrt{\text{Check one box.}}$ Yes = 0 points No = 50 points
	Write 0 or 50 in the E point total box 0 E Point Total
F.	Has the operator-in-charge maintained recertification requirements during the reporting year?
	$\sqrt{\text{Check one box.}}$ Yes No
G.	How many hours of continuing education has the operator-in-charge completed over the last two calendar years?
	$\sqrt{\text{Check one box.}}$ $\overline{\mathbf{X}} > 12 \text{ hours} = 0 \text{ points}$ $\overline{} < 12 \text{ hours} = 50 \text{ points}$
	Write 0 or 50 in the G point total box 0 G Point Total
H.	Is there a written policy regarding continuing education an training for wastewater treatment plant employees?
	$\sqrt{\text{Check one box.}}$ Yes No
	<i>Explain:</i> <u>16 hours of continuing education within a two year period.</u>
I.	What percentage of the continuing education expenses of the operator-in-charge were paid for:
	By the permittee? 100% By the operator? 0%
J.	Add together the E and G point values and place the sum in the box below at the right.
	TOTAL POINT VALUE FOR PART 7: 0 (max = 100)
	Also enter this value or 100, whichever is less, on the point calculation table on page 16.
	11

Permit #: LA0036412

PART 8: FINANCIAL STATUS

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

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

No, sewer user fee revenues alone are not sufficient to cover O&M expenses. The City-Parish has two sources of revenue for sewer, the sewer user fee, and a one-half of one percent sales and use tax dedicated to sewer. 65% of the revenue base is from the sewer user fee and 35% from the sewer sales tax.

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

See A above. The City-Parish has financed it's sewer construction needs through the issuance of sewer revenue bonds and any funding that remains after O&M and debt services requirements are met.

PART 9: SUBJECTIVE EVALUATION

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

See attachment

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

See attachment

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

See attachment

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

- i. Do you have duckweed buildup in the ponds?
- ii. Do you mow the dikes regularly (at least monthly), to the waters edge?
- iii. Do you have bushes or trees growing on the dikes or in the ponds?
- iv. Do you have excess sludge buildup (> 1foot) on the bottom of any of your ponds?
- v. Do you exercise all of your valves?
- vi. Are your control manholes in good structural shape?
- vii. Do you maintain at least 3 feet of freeboard in all of your ponds?
- viii. Do you visit your pond system at least weekly?

Yes No Yes No

√ Check one box.

LA0036412 SOUTH WASTEWATER PLANT BASIN MONITORING PERIOD - September 1, 2019 thru August 31, 2020 LA MWPP Environmental Audit Part 9:

Subjective Evaluation

A1. The City-Parish has continued an aggressive physical inspection and preventative maintenance program on the sewer system. Currently, the City-Parish is on an approximate 8-year rotation for the physical inspection of the collection system, which includes, pipeline cleaning, televising, and smoke testing, and manhole inspection. Additionally, the City-Parish has implemented a grease and root treatment for areas subject to dense tree canopy and high-impact fats, oils and grease (FOG) contributors.

Additionally, the City-Parish maintains multiple annual contracts to complete point repairs, emergency point repairs, cured-in-place lining manhole rehabilitation, valve maintenance and remove and replace for existing pipelines. A summary of the activities is included in the table below.

	SEPT.				JUL/AUG	
Gravity Collection System	2019	Q4 2019	Q1 2020	Q2 2020	2020	Total
Lines Cleaned (ft)	26,573	54,611	155,215	89,935	96,549	422,883
CCTV Inspected (ft)	29,049	78,579	47,671	74,600	67,765	297,664
Smoke Tested (ft)	48,719	99,640	64,320	22,941	17,275	252,895
Smoke Tested (no. of locations)	0	0	0	87	53	140
Dye Water Flooded (no. of locations)	21	57	107	80	60	325
Manholes Inspected (no.)	4	25	34	53	0	116
Lines Repaired (no.)	52	159	119	117	89	536
Manholes Rehabilitated (no.)	0	183	1	4	188	376
Force Mains						
Visual Surface Inspection (Miles)	3	11.6	18.2	29.2	8	70
Repaired (no.)	0	0	0	3	0	3
Air Release Valves						
Inspected / Maintained	25	58	91	146	40	360
Repaired (no.)	0	0	4	4	1	9

Note: September 2019 and July/August 2020 data provided as a weighted average based on the quarterly data, as individual month data is not available.

A2. The City-Parish maintains a routine pump station preventative maintenance and reactive maintenance program. The pump station staff and contractors are responsible for visits to pump stations for general observations and preventative maintenance and completing repairs to pump stations, identified through site visits, SCADA, and/or public notifications. A summary of the activities is included in the table below.

Pump & Lift Stations	SEPT. 2019	Q4 2019	Q1 2020	Q2 2020	JUL/AUG 2020	Total
Inspections (no.)	74	321	718	1,336	904	3,353
Wet Wells Cleaned	34	120	150	113	119	536
Repaired (no.)	10	14	17	17	12	70

Note: September 2019 and July/August 2020 data provided as a weighted average based on the quarterly data, as individual month data is not available.

A3. The City-Parish recently completed a \$1.25 billion capital improvements program to improve conveyance, pumping, and treatment capacities and rehabilitate existing system assets.

The City-Parish continues planning, engineering, and construction efforts to continually improve system operation and efficiency. This includes routine collection system rehabilitation through the point repairs, cured-in-place pipe lining, and remove and replace of existing damage pipelines. Additionally, multiple projects are ongoing, in either planning, design, or construction to rehabilitate, improve capacity, and/or expand the collection system. This includes the lining of critical large diameter gravity pipeline infrastructure, improvement to multiple pump stations, the installation of gravity systems to collect septic effluent, and the expansion of the system to accommodate critical healthcare infrastructure.

The City-Parish has begun the prioritizing and planning of a 1-year and 5-year CIP in the to address infrastructure not addressed in other capital projects.

	Permit #: LA0036412
C.	Treatment Plants
i.	Have the influent and effluent flow meters been calibrated in the last year?
	\checkmark Yes \square No (\checkmark Check one box.)
	03/31/2003/31/20Influent flow meter calibration date(s)Effluent flow meter calibration date(s)
ii.	What problems, if any, have been experienced over the last year that have threatened treatment?
	NA
iii.	Is your community presently involved in formal planning for treatment facility upgrade?
	\vee Check one box. ☐ Yes \checkmark No If Yes, Please describe:

	Permit #: LA0036412
D.	Preventive Maintenance
i.	Does your plant have a written plan for preventive maintenance on major equipment items?
	√ Check one box. X Yes No If Yes, Please describe:
	Weekly, monthly and semi-annually preventive maintenance sheets that reflect type and frequency as specified in the O&M manuals. A computerized maintenance management system manages the preventive maintenance of plant equipment and spare parts.
ii.	Does this preventive maintenance program depict frequency of intervals, types of lubrication and other preventive maintenance tasks necessary for each piece of equipment?
iii.	Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assured properly?
Ξ.	X Yes No
i.	Does your community have a sewer use ordinance that limits or prohibits the discharge of excessive conventional pollutants (BOD, TSS or pH) or toxic substances to the sewer system from industries, commercial users and residences?
	\vee Check one box. X Yes No If Yes, Please describe:
	Sewer User Fee Ordinance (No. 7853) limits the discharge of BOD & TSS to 200 mg/l and 250 mg/l respectively. Any discharge above these limits is surcharged at a rate of 2% of the monthly sewer user fee for each limit of 10 mg/l. Pretreatment Ordinance (No. 16120) limits the discharge of heavy metals, chemical and toxic substances.
ii.	Has it been necessary to enforce?
	\vee Check one box. X Yes No If Yes, Please describe:
	The Sewer User Fee Ordinance is strictly enforced by the City Parish and self monitoring sampling. The same apply to the Pretreatment Ordinance. Enforcement mechanisms include discharge permits, surcharges, letter of violations, administrative orders, water termination, and fines.
iii.	Any additional comments about your treatment plant or collection system? (Attach additional sheets if necessary.)

Permit #: LA0036412

POINT CALCULATION TABLE

	Actual Values	Maximum
Part 1: Influent Flow/Loadings	5	80 points
Part 2: Effluent Quality / Plant Performance	0	100 points
Part 3: Age of WWTF	12.5	50 points
Part 4: Overflows and Bypasses	100	100 points
Part 5: Ultimate Disposition of Sludge	50	100 points
Part 6: New Development	0	30 points
Part 7: Operator Certification Training	0	100 points

TOTAL POINTS:

	167.5	
_		

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

Resolved that the village/town/city of	Baton Rouge	informs the
Louisiana Department of Environmenta	Quality that the following	ng actions were taken by
Metropolitan Council		erning body).

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

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

- a. Currently, we are operating under a consent decree which became effective March 14, 2002.
- b.
- c.
- d.
- etc..

Passed by a majority/unanimous (circle one) vote of the	Metropolitan Council
on December 9, 20020	A.D.I.V 1
	Ashran Beck
	CLEIN

ERK

By Introduction DH

A D O P T E D FAST BATON ROUGE SEWAGE COMMISSION

ADOPTED METROPOLITAN COUNCIL

DEC 0 9 2020

DEC 09 2020

20-01418

COUNCIL ADMINISTRATOR TREASURER

RESOLUTION 55340

EBROSCO RESOLUTION 8524

AUTHORIZING THE MAYOR-PRESIDENT AND/OR EBROSCO TO APPROVE THE SUBMITTAL OF THE LOUISIANA MUNICIPAL WATER POLLUTION PREVENTION (MWPP) ENVIRONMENTAL AUDIT FOR THE SOUTH TREATMENT PLANT (LA0036412 AI#4841) TO THE LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ) FOR THE MONITORING PERIOD OF SEPTEMBER 1, 2019 THROUGH AUGUST 31, 2020.

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. The Mayor-President, on behalf of the City of Baton Rouge and Parish of East Baton Rouge, and/or the East Baton Rouge Sewerage Commission, represented by President of said Commission, are hereby authorized to approve the submittal of the Louisiana Municipal Water Pollution Prevention (MWPP) Environmental Audit for the South Treatment Plant (LA0036412 AI#4841) to the Louisiana Department of Environmental Quality (LDEQ) for the monitoring period of September 1, 2019 through August 31, 2020.

Section 2. Said agreement shall be approved by the Office of the Parish Attorney as to form and legality.

2020 Annual Report Attachment C

Environmental Results Monitoring

Environmental Results Monitoring Program Phase 2 Quarter 4 Results

Memorandum

100 North Street, Suite 901 Baton Rouge, LA 70802

www.jacobs.com

Subject	Environmental Results Monitoring Program Phase 2, Quarter 4 Results	Project Name	Baton Rouge SSOP
Attention	Mr. Richard Speer, P.E. Director, Department of Environmental Services City of Baton Rouge, Louisiana	Project No.	BTRSSO16
From Date	Patrick Gervais February 18, 2020		

Purpose

On February 6, 2020, the City of Baton Rouge, Parish of East Baton Rouge conducted the 4th quarterly Phase 2 Baseline Monitoring event, as required by the 2002 Consent Decree. The purpose of this memorandum is to characterize the rain event, summarize the sampling procedures, and report laboratory analysis results. Background information on the Environmental Results Monitoring (ERM) program can be found in the ERM Plan (Exhibit G of the Consent Decree).

Rain Event

Rainfall data was recorded at USGS monitoring stations located upstream of each of the designated sample locations. The locations of the observed USGS monitoring stations are shown in Figure 1.

Cumulative precipitation from the rain event over February 5-6, 2020 is shown in Figure 2. The event lasted approximately 18 hours, with the highest-intensity rainfall occurring during 11:00 PM on February 5th to 3:30 AM on the 6th. A summary of the rainfall at each sample site is provided in Table 1.

Procedures

One grab sample was taken from each of the five designated sample sites between the hours of 2:04 PM and 3:35 PM. Samples were taken from the approximate center of each stream. Grab samples from each site were poured into three separate laboratory-prepared sample containers, which were labeled with the sample date, time, and location name immediately following sample collection. Samples were stored on ice and delivered to the laboratory immediately following collection of the final sample.

All samples were analyzed at a laboratory for the parameters established in the ERM plan, which include fecal coliform, fecal streptococcus, and enterococcus. Sample holding times and laboratory procedures conformed with those outlines in the USEPA "Methods for Chemical Analysis of Water and Wastes", 1983, and USEPA "Test Methods for the Examination of Solid Waste – SW846", 1992.

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 4 Results

Results

Results of laboratory analyses are summarized in Table 2. Further analysis of these results based on future water quality and stream flow data will be conducted upon completion of Phase I Baseline Monitoring. Gage height data from February 4-8, 2020, recorded at USGS stream flow monitoring stations upstream of each sample location, are shown in Figure 3.

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 4 Results

Tables

Total Rainfall Sample Peak Intensity **Peak Intensity** Location **Date and Time** Date and Time (in/hr) (in) 2/6/20 2/5/20 Baton Rouge Metro Airport^a 0.71 2.30 2:04 PM 11:00 PM 2/5/20 2/6/20 Bayou Fountain at Grand Lakes Dr. 0.77 1.87 2:15 PM 11:45 PM 2/6/20 2/5/20 Comite R. at Port Hudson-Pride Rd. 0.81 2.99 2:41 PM 9:15 PM 2/6/20 2/6/20 Jones Cr. at O'Neal Ln. 0.61 1.20 2:50 PM 3:30 AM 2/6/20 2/6/20 Ward Cr. at Highland Rd. 1.21 1.97 3:35 PM 12:15 AM

Table 1: Rainfall Summary for Phase 2, Quarter 4

^a The Comite River at Greenwell Springs gage does not have a precipitation gage. The hourly rainfall recorded at Baton Rouge airport is listed as a substitute for rainfall recorded at the gage.

in: Inches; hr: Hour

Table 2: Water Quality Sampling Results for Phase 2, Quarter 4

Location	Sample Date and Time	Enterococci (MPN/100 mL)	Fecal Coliform (MPN/ 100 mL)
Comite R. at Greenwell Springs Rd.	2/6/20 2:04 PM	19,900	> 24,100
Bayou Fountain at Grand Lakes Dr.	2/6/20 2:15 PM	> 24,100	15,500
Comite R. at Port Hudson-Pride Rd.	2/6/20 2:41 PM	> 24,100	> 24,100
Jones Cr. at O'Neal Ln.	2/6/20 2:50 PM	> 24,100	> 24,100
Ward Cr. at Highland Rd.	2/6/20 3:35 PM	> 24,100	> 24,100

MPN: Most Probable Number; mL: Milliliters

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 4 Results

Figures



Figure 1: Sampling Locations

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 4 Results



Figure 2: Cumulative Precipitation – February 4-8, 2020

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 4 Results



Figure 3: USGS Gage Height – February 4-8, 2020



February 10, 2020

Sarah Boudreaux East Baton Rouge Parish Pretreatment Division 345 Chippewa St. Baton Rouge, LA 70805 TEL: FAX:

RE: BF-0220-D

Order No.: 20020238

Dear Sarah Boudreaux:

Element Materials Technology Lafayette received 1 sample(s) on 2/6/2020 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

Where applicable, all soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as –dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA023. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

Estimated uncertainty is available upon request. This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions regarding these test results, please feel free to call.

Junos

Cristina Thibeaux Customer Service Supervisor 2417 W. Pinhook Road Lafayette, LA 70508-3344



Case Narrative

WO#:	20020238
Date:	2/10/2020

CLIENT:	East Baton Rouge Parish Pretreatment Divi
Project:	BF-0220-D

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

The results of the laboratory internal quality control data are provided in the QC Summary Report section of the report for your review. Laboratory-related QC exceptions that may impact the validity of data are discussed in the case narrative. Sample-related QC exceptions are flagged either in the results page(s) or in the QC report page(s). End users should consider QC exceptions when evaluating sample data against data quality objectives.

Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



Analytical Report

(consolidated) WO#: 20020238 Date Reported: 2/10/2020

CLIENT:	East Baton Rouge Pa	arish Pretreatmer	nt Division	Collection Date	e: 2/6/20	020 2:15:00 PM
Project:	BF-0220-D					
Lab ID:	20020238-001			Matrix	K: AQUI	EOUS
Client Sample 1	ID BF-0220-D					
Analyses		Result	RL Qua	l Units	DF	Date Analyzed
ENTEROCOCO	CI BY IDEXX ENTEROL	ERT-E WITH QU	IANTI-TRAY	SM9230[)	Analyst: BXB
ENTEROCOCO	CI BY IDEXX ENTEROL	ERT-E WITH QU >24100	10.0	SM9230E MPN/100mL	D 10	Analyst: BXB 2/6/2020 5:45:00 PM
Enterococci	CI BY IDEXX ENTEROL	>24100	10.0		10	

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit SDL

Sample detection limit

Н

W Sample container temperature is out of limit as specified at testcode М Matrix Interference

RL Reporting Limit



QC SUMMARY REPORT

WO#: 20020238

10-Feb-20

Client: Project:	East Baton BF-0220-D	Rouge Parish Pretreatme	ent Division	BatchID:	R85909
Sample ID: Client ID:	MB-85909 PBW	SampType: MBLK Batch ID: R85909	TestCode: FECAL_COLI Units: MPN/100n TestNo: Colilert-18	L Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152454
Analyte		Result	PQL SPK value SPK Ref Val	REC LowLimit HighLimit RPD Ref	Val %RPD RPDLimit Qual
Fecal Colifo	orm	< 1.0	1.0		
•	20020240-001ADUP ZZZZZZ	SampType: DUP Batch ID: R85909	TestCode: FECAL_COLI Units: MPN/100n TestNo: Colilert-18	L Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152456
Analyte		Result	PQL SPK value SPK Ref Val	REC LowLimit HighLimit RPD Ref	Val %RPD RPDLimit Qual
Fecal Colifo	orm	>24100	10.0	24,1	00 0 20

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference SDL Sample detection limit ND Not Detected at the Reporting Limit

U Analyte not detected

RL Reporting Limit W Sample container temperature is o

Sample container temperature is out of limit as specified at testcode



QC SUMMARY REPORT

WO#: 20020238

10-Feb-20

Client: Project:	East Baton I BF-0220-D	Rouge Parish Pretreatmo	ent Division		BatchID	: R85950	
-	MB-R85950 PBW	SampType: MBLK Batch ID: R85950	TestCode: ENTEROCOC Un TestNo: SM9230D	its: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85950 SeqNo: 2153134	
Analyte		Result	PQL SPK value SPK R	ef Val %REC	LowLimit HighLimit RPD Re	ef Val %RPD RPDLimit	Qual
Enterococci		< 1.0	1.0				
	20020238-001ADUP BF-0220-D	SampType: DUP Batch ID: R85950	TestCode: ENTEROCOC Un TestNo: SM9230D	its: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85950 SeqNo: 2153140	
Analyte		Result	PQL SPK value SPK R	ef Val %REC	LowLimit HighLimit RPD Re	ef Val %RPD RPDLimit	Qual
Enterococci		>24100	10.0		24	4,100 0 20	

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



Sample Log-In Check List

Clie	nt Name:	EAST_BR_PRETREATM	Work Order Number:	20020238		RcptNo:	1
Log	ged by:	Danielle Hollier	2/6/2020 5:05:00 PM		Danith	Hollin	
Con	npleted By:	Danielle Hollier	2/6/2020 5:15:24 PM		Dannik Dannik Carten Duptan	Hollin	
Rev	iewed By:	Caitlin Duplantis	2/7/2020 1:58:57 PM		Caitlin Duplan		
<u>Cha</u>	in of Cu	stody					
1.	Is Chain of	Custody complete?		Yes 🖌	No 🗌	Not Present	
2.	How was th	e sample delivered?		<u>Client</u>			
1.00	In						
<u>Log</u> 3.	Coolers are	present?		Yes 🖌	No 🗌		
Л	Shipping co	ontainer/cooler in good condit	ion?	Yes 🖌	No 🗌		
4.		als intact on shipping contain		Yes		Not Present 🗹	
	No.	Seal Da		Signed By:			
5.		empt made to cool the sample		Yes 🖌	No 🗌	NA 🗌	
6.	Were all sa	mples received at a temperat	ure of >0° C to 6.0°C	Yes 🗹	No 🗌	NA 🗌	
7.	Sample(s) i	n proper container(s)?		Yes 🖌	No 🗌		
8.	Sufficient s	ample volume for indicated te	est(s)?	Yes 🗸	No 🗌		
9.	Are sample	s (except VOA and ONG) pr	operly preserved?	Yes 🗸	No 🗌		
10.	Was preser	rvative added to bottles?		Yes	No 🖌	NA 🗌	
11	Is the heads	space in the VOA vials less t	han 1/4 inch or 6 mm?	Yes	No 🗌	No VOA Vials 🗹	
		ample containers received br		Yes	No 🖌		
13.		work match bottle labels?		Yes 🖌	No 🗌		
11		epancies on chain of custody is correctly identified on Chair	,	Yes 🔽	No 🗌		
		hat analyses were requested	-	Yes 🗹			
		Iding times able to be met?		Yes 🗹			
10.		customer for authorization.)					
<u>Spe</u>	cial Hand	<u>dling (if applicable)</u>					
17.	Was client	notified of all discrepancies w	vith this order?	Yes	No 🗌	NA 🔽	
	Perso	n Notified:	Date:				
	By WI	hom:	Via:	eMail	Phone 🗌 Fax	In Person	
	Regar	,					
		Instructions:					
18.	Additional re	emarks:					

Cooler Information

Cooler No	Temp ºC	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.5	Good	Not Present			

20020238



Chain of Custody Record for Fecal Coliform Testing

Wastewater Treatment Laboratory 2443 River Rd. Baton Rouge, LA 70802

Sampler Name	Date	Time Taken	Site/Location	Comments/Remarks
D. Mesa	2/6/20	2:15 pm	Grand Lakes 1. Bayou Fountain	BF-0220-D
			A PARA PARA	
		2100		1
	1000			
		1. 19		
				-

Relinquished By:	Received By:	Time:	Date:
for you	19	1705	2-6-20
		The Martin and	

Temp'. 2.5" J+ 1210



February 10, 2020

Sarah Boudreaux East Baton Rouge Parish Pretreatment Division 345 Chippewa St. Baton Rouge, LA 70805 TEL: FAX:

RE: CR-0220-W

Order No.: 20020241

Dear Sarah Boudreaux:

Element Materials Technology Lafayette received 1 sample(s) on 2/6/2020 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

Where applicable, all soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as –dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA023. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

Estimated uncertainty is available upon request. This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions regarding these test results, please feel free to call.

Junos

Cristina Thibeaux Customer Service Supervisor 2417 W. Pinhook Road Lafayette, LA 70508-3344



Case Narrative

WO#:	20020241
Date:	2/10/2020

CLIENT:	East Baton Rouge Parish Pretreatment Divi
Project:	CR-0220-W

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

The results of the laboratory internal quality control data are provided in the QC Summary Report section of the report for your review. Laboratory-related QC exceptions that may impact the validity of data are discussed in the case narrative. Sample-related QC exceptions are flagged either in the results page(s) or in the QC report page(s). End users should consider QC exceptions when evaluating sample data against data quality objectives.

Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



Analytical Report

(consolidated)

WO#:
20020241

Date Reported:
2/10/2020

CLIENT:	East Baton Rouge Pa	arish Pretreatme	nt Division	Collection Date	e: 2/6/2	020 2:04:00 PM
Project: Lab ID: Client Sample	CR-0220-W 20020241-001 ID CR-0220-W			Matrix	K: AQU	EOUS
Analyses		Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOC	CI BY IDEXX ENTEROL	ERT-E WITH QU	ANTI-TRAY	SM9230I	כ	Analyst: BXB
ENTEROCOC Enterococci	CI BY IDEXX ENTEROL	ERT-E WITH QU 19,900	IANTI-TRAY	SM9230I MPN/100mL) 10	Analyst: BXB 2/6/2020 5:45:00 PM
Enterococci	CI BY IDEXX ENTEROL	19,900	10.0		10	

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

SDL Sample detection limit

Н

W Sample container temperature is out of limit as specified at testcode

M Matrix Interference

RL Reporting Limit



QC SUMMARY REPORT

WO#: 20020241

10-Feb-20

Client: Project:	East Baton CR-0220-W	Rouge Parish Pretreat	ment Division		BatchID:	R85909
Sample ID: N Client ID: F	MB-85909 PBW	SampType: MBLK Batch ID: R85909	TestCode: FECAL_COLI Units: I TestNo: Colilert-18	MPN/100mL Ar	Prep Date: nalysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152454
Analyte		Result	PQL SPK value SPK Ref Va	I %REC I	LowLimit HighLimit RPD Ref Val	I %RPD RPDLimit Qual
Fecal Coliforn	n	< 1.0	1.0			
	20020240-001ADUP ZZZZZZ	SampType: DUP Batch ID: R85909	TestCode: FECAL_COLI Units: I TestNo: Colilert-18	MPN/100mL Ai	Prep Date: nalysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152456
Analyte		Result	PQL SPK value SPK Ref Va	I %REC I	LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual
Fecal Coliforn	n	>24100	10.0		24,100	0 20

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



QC SUMMARY REPORT

WO#: 20020241

10-Feb-20

Client: Project:	East Baton Rouge CR-0220-W	Parish Pretreatr	nent Divisior	1				В	atchID:	R85950		
Sample ID: MB-R8 Client ID: PBW		Type: MBLK ch ID: R85950		e: ENTEROC o: SM9230D	OC Units: MPN	V/100mL	Prep Dat Analysis Dat		0	RunNo: 85 9 SeqNo: 21 5		
Analyte	Dau	Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit		RPD Ref Val	%RPD	RPDLimit	Qual
Enterococci		< 1.0	1.0									
Sample ID: 200202 Client ID: ZZZZZ		Type: DUP ch ID: R85950		e: ENTEROC o: SM9230D	C Units: MPM	V/100mL	Prep Dat Analysis Dat		0	RunNo: 859 SeqNo: 215		
Analyte		Result	PQL	SPK value	SPK Ref Val	%REC	LowLimit	HighLimit	RPD Ref Val	%RPD	RPDLimit	Qual
Enterococci		>24100	10.0						24,100	0	20	

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



Sample Log-In Check List

Clie	nt Name:	EAST_BR_PRETREATM	Work Order Number:	20020241		RcptNo:	1
Log	ged by:	Danielle Hollier	2/6/2020 5:05:00 PM		Danielles Danielles Casteris Duplie	Hollin	
Con	npleted By:	Danielle Hollier	2/6/2020 5:21:10 PM		Danit	Hollin	
Rev	iewed By:	Caitlin Duplantis	2/7/2020 2:01:59 PM		Caitlin Dupla	IU	
Cha	nin of Cus	stody					
1.	Is Chain of	Custody complete?		Yes 🖌	No 🗌	Not Present	
2.	How was th	e sample delivered?		<u>Client</u>			
Log	In						
-	Coolers are	present?		Yes 🖌	No 🗌		
Δ	Shippina ca	ontainer/cooler in good condition	n?	Yes 🗹	No 🗌		
ч.		als intact on shipping containe		Yes	No 🗌	Not Present	
	No.	Seal Date	Э:	Signed By:			
5.	Was an atte	empt made to cool the sample		Yes 🗹	No 🗌	NA 🗌	
6.	Were all sa	mples received at a temperatu	re of >0° C to 6.0°C	Yes 🖌	No 🗌		
7.	Sample(s) i	n proper container(s)?		Yes 🖌	No 🗌		
8.	Sufficient s	ample volume for indicated tes	st(s)?	Yes 🗸	No 🗌		
9.		s (except VOA and ONG) pro		Yes 🖌	No 🗌		
10.	Was preser	rvative added to bottles?		Yes	No 🖌	NA 🗌	
11.	Is the heads	space in the VOA vials less th	an 1/4 inch or 6 mm?	Yes	No 🗌	No VOA Vials 🗹	
12.	Were any s	ample containers received bro	ken?	Yes	No 🔽		
13.		work match bottle labels? epancies on chain of custody)		Yes 🖌	No 🗌		
14		s correctly identified on Chain	of Custody?	Yes 🖌	No 🗌		
		hat analyses were requested?		Yes 🖌	No 🗌		
	Were all ho	lding times able to be met?		Yes 🖌	No 🗌		
Sno		customer for authorization.)					
-		notified of all discrepancies wi	th this order?	Yes	No	NA 🔽	
		n Notified:]
			Date:				
	By WI	/	Via:	eMail I	Phone 🗌 Fax	In Person	
	Regar						
		Instructions:					
18.	Additional r	emarks:					

Cooler Information

Cooler No	Temp ºC	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.5	Good	Not Present			

20020241



Chain of Custody Record for Fecal Coliform Testing

Wastewater Treatment Laboratory 2443 River Rd. Baton Rouge, LA 70802

Sampler Name	Date	Time Taken	Site/Location	Comments/Remarks
WELLEAM FESHBURN	2/6/20	2:04 PM	Greenwell Springs - Consite River	CR-0220 - W
	2			
A STATE				
				10 State
		1		

Relinquished By:	Received By:	Time:	Date:
Jer you	D	2 1705	2-6-20
		-	
101			

Temp: 2.5" JH TEID

Page 7 of 7



February 10, 2020

Sarah Boudreaux East Baton Rouge Parish Pretreatment Division 345 Chippewa St. Baton Rouge, LA 70805 TEL: FAX:

RE: JC-0220-D

Order No.: 20020239

Dear Sarah Boudreaux:

Element Materials Technology Lafayette received 1 sample(s) on 2/6/2020 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

Where applicable, all soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as –dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA023. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

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If you have any questions regarding these test results, please feel free to call.

Junos

Cristina Thibeaux Customer Service Supervisor 2417 W. Pinhook Road Lafayette, LA 70508-3344



Case Narrative

WO#:	20020239
Date:	2/10/2020

CLIENT:	East Baton Rouge Parish Pretreatment Divi
Project:	JC-0220-D

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

The results of the laboratory internal quality control data are provided in the QC Summary Report section of the report for your review. Laboratory-related QC exceptions that may impact the validity of data are discussed in the case narrative. Sample-related QC exceptions are flagged either in the results page(s) or in the QC report page(s). End users should consider QC exceptions when evaluating sample data against data quality objectives.

Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



Analytical Report

(consolidated) WO#: **20020239** Date Reported: **2/10/2020**

CLIENT:	East Baton Rouge Pa JC-0220-D	arish Pretreatme	nt Division	Collection Date	e: 2/6/2	020 2:50:00 PM
Project: Lab ID: Client Sample	20020239-001 ID JC-0220-D			Matrix	AQU	EOUS
Analyses		Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOC		ERT-E WITH QU	JANTI-TRAY	SM9230[)	Analyst: BXB
Enterococci		>24100	10.0	MPN/100mL	10	2/6/2020 5:45:00 PM
	ORM USING COLILERT			MPN/100mL		2/6/2020 5:45:00 PM Analyst: KML

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

SDL Sample detection limit

Н

W Sample container temperature is out of limit as specified at testcode

M Matrix Interference

RL Reporting Limit


QC SUMMARY REPORT

WO#: 20020239

10-Feb-20

Client: Project:	East Baton JC-0220-D	Rouge Parish Pretreatme	ent Division	BatchID:	R85909
Sample ID: Client ID:	MB-85909 PBW	SampType: MBLK Batch ID: R85909	TestCode: FECAL_COLI Units: MPN/100mL TestNo: Colilert-18	Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152454
Analyte		Result	PQL SPK value SPK Ref Val %R	EC LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual
Fecal Colifo	orm	< 1.0	1.0		
Sample ID: Client ID:	20020240-001ADUP ZZZZZZ	SampType: DUP Batch ID: R85909	TestCode: FECAL_COLI Units: MPN/100mL TestNo: Colilert-18	Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152456
Analyte		Result	PQL SPK value SPK Ref Val %R	EC LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual
Fecal Colifo	orm	>24100	10.0	24,100	0 20

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



QC SUMMARY REPORT

WO#: 20020239

10-Feb-20

Client: Project:	East Baton I JC-0220-D	Rouge Parish Pretreatme	ent Division		BatchID	D: R85950	
Sample ID: Client ID:	MB-R85950 PBW	SampType: MBLK Batch ID: R85950	TestCode: ENTEROO TestNo: SM9230D	COC Units: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85950 SeqNo: 2153134	
Analyte		Result	PQL SPK value	SPK Ref Val %REC	LowLimit HighLimit RPD R	Ref Val %RPD RPDLimit	Qual
Enterococci		< 1.0	1.0				
	20020238-001ADUP ZZZZZZ	SampType: DUP Batch ID: R85950	TestCode: ENTEROO TestNo: SM9230D	COC Units: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85950 SeqNo: 2153140	
Analyte		Result	PQL SPK value	SPK Ref Val %REC	LowLimit HighLimit RPD R	Ref Val %RPD RPDLimit	Qual
Enterococci		>24100	10.0		2	24,100 0 20	

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



Sample Log-In Check List

Clie	nt Name:	EAST_BR_PRETREATM	Work Order Number:	20020239		RcptNo:	1
Log	ged by:	Danielle Hollier	2/6/2020 5:05:00 PM		Danith	Hollin	
Con	npleted By:	Danielle Hollier	2/6/2020 5:17:53 PM		Dannik Dannik Carten Duptan	Hollin	
Rev	iewed By:	Caitlin Duplantis	2/7/2020 2:00:07 PM		Caitlin Duptan	τų_	
<u>Cha</u>	in of Cus	stody					
1.	Is Chain of	Custody complete?		Yes 🖌	No 🗌	Not Present	
2.	How was th	e sample delivered?		<u>Client</u>			
Log	In						
-	Coolers are	present?		Yes 🖌	No 🗌		
1	Shipping co	ontainer/cooler in good conditi	on?	Yes 🖌	No		
4.		als intact on shipping contain		Yes		Not Present 🗹	
	No.	Seal Dat		Signed By:			
5.		empt made to cool the sample		Yes 🖌	No 🗌	NA 🗌	
					_	_	
6.	Were all sa	mples received at a temperat	ure of >0° C to 6.0°C	Yes 🗹	No 🗌	NA 🗌	
7.	Sample(s) i	n proper container(s)?		Yes 🔽	No 🗌		
8.	Sufficient sa	ample volume for indicated te	st(s)?	Yes 🖌	No 🗌		
9.	Are sample	s (except VOA and ONG) pro	operly preserved?	Yes 🖌	No 🗌		
10.	Was preser	rvative added to bottles?		Yes	No 🖌	NA 🗌	
11	Is the heads	space in the VOA vials less th	nan 1/4 inch or 6 mm?	Yes	No 🗌	No VOA Vials 🗹	
		ample containers received br		Yes	No 🖌		
	Does paper	work match bottle labels? epancies on chain of custody		Yes 🖌	No 🗌		
11		s correctly identified on Chair		Yes 🔽	No 🗌		
		hat analyses were requested		Yes 🗹			
		Iding times able to be met?		Yes 🗹			
10.		customer for authorization.)					
<u>Spe</u>	cial Hand	<u>dling (if applicable)</u>					
17.	Was client	notified of all discrepancies w	ith this order?	Yes	No	NA 🗹	
	Perso	n Notified:	Date:				
	By Wł	hom:	Via:	eMail 🗌 I	Phone 🗌 Fax	In Person	
	Regar	,					
		Instructions:					
18.	Additional re	emarks:					

Cooler Information

Cooler No	Temp ºC	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.5	Good	Not Present			

20020739



Chain of Custody Record for Fecal Coliform Testing

Wastewater Treatment Laboratory 2443 River Rd. Baton Rouge, LA 70802

Sampler Name	Date	Time Taken	Site/Location	Comments/Remarks
D. Mesa	2/6/20	2:50pr	n O'Neal IJones Creek	JC-0220-D
Mar Sala				
	A Hereit			
		and the second	No. of Concession, Name	
	-	- And	and the second second	A REAL PROPERTY OF LAND
-	all the second		in the second	
and the second				-

Received By:	Time:	Date:	
a	1705	2-6-20	
	Received By:	Received By: Time:	

Temp: 2.5ª



February 10, 2020

Sarah Boudreaux East Baton Rouge Parish Pretreatment Division 345 Chippewa St. Baton Rouge, LA 70805 TEL: FAX:

RE: CRN-0220-W

Order No.: 20020242

Dear Sarah Boudreaux:

Element Materials Technology Lafayette received 1 sample(s) on 2/6/2020 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

Where applicable, all soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as –dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA023. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

Estimated uncertainty is available upon request. This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions regarding these test results, please feel free to call.

Junos

Cristina Thibeaux Customer Service Supervisor 2417 W. Pinhook Road Lafayette, LA 70508-3344



Case Narrative

WO#:	20020242
Date:	2/10/2020

CLIENT:	East Baton Rouge Parish Pretreatment Divi
Project:	CRN-0220-W

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

The results of the laboratory internal quality control data are provided in the QC Summary Report section of the report for your review. Laboratory-related QC exceptions that may impact the validity of data are discussed in the case narrative. Sample-related QC exceptions are flagged either in the results page(s) or in the QC report page(s). End users should consider QC exceptions when evaluating sample data against data quality objectives.

Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



Analytical Report

(consolidated) WO#: **20020242** Date Reported: **2/10/2020**

CLIENT: Project:	East Baton Rouge Pa CRN-0220-W	rish Pretreatmer	nt Division	Collection Date	e: 2/6/2	020 2:41:00 PM
Project: Lab ID: Client Sample	20020242-001 ID CRN-0220-W			Matrix	K: AQU	EOUS
Analyses		Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOC	CI BY IDEXX ENTEROLE	ERT-E WITH QU	IANTI-TRAY	SM9230I	D	Analyst: BXB
ENTEROCOC	CI BY IDEXX ENTEROLE	E RT-E WITH QU >24100	IANTI-TRAY	SM9230I MPN/100mL) 10	Analyst: BXB 2/6/2020 5:45:00 PM
Enterococci	CI BY IDEXX ENTEROLE	>24100	10.0		10	

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

SDL Sample detection limit

Н

W Sample container temperature is out of limit as specified at testcode

M Matrix Interference

RL Reporting Limit



QC SUMMARY REPORT

WO#: 20020242

10-Feb-20

Client: Project:	East Baton CRN-0220-	Rouge Parish Pretreatme W	ent Division	BatchID:	R85909
Sample ID: Client ID:	MB-85909 PBW	SampType: MBLK Batch ID: R85909	TestCode: FECAL_COLI Units: MPN/100mL TestNo: Colilert-18	Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152454
Analyte		Result	PQL SPK value SPK Ref Val %RI	C LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual
Fecal Colifor	rm	< 1.0	1.0		
	20020240-001ADUP ZZZZZZ	SampType: DUP Batch ID: R85909	TestCode: FECAL_COLI Units: MPN/100mL TestNo: Colilert-18	Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152456
Analyte		Result	PQL SPK value SPK Ref Val %RI	C LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual
Fecal Colifor	rm	>24100	10.0	24,100	0 20

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

SDL Sample detection limit

ND Not Detected at the Reporting Limit

U Analyte not detected

RL Reporting Limit W Sample container temperature is



QC SUMMARY REPORT

WO#: 20020242

10-Feb-20

Client: Project:	East Baton 1 CRN-0220-	Rouge Parish Pretreatme W	ent Division		BatchID:	R85950
-	MB-R85950 PBW	SampType: MBLK Batch ID: R85950	TestCode: ENTEROC TestNo: SM9230D	COC Units: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85950 SeqNo: 2153134
Analyte		Result	PQL SPK value	SPK Ref Val %REC	LowLimit HighLimit RPD Ref	Val %RPD RPDLimit Qual
Enterococci		< 1.0	1.0			
	20020238-001ADUP ZZZZZZ	SampType: DUP Batch ID: R85950	TestCode: ENTEROC TestNo: SM9230D	COC Units: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85950 SeqNo: 2153140
Analyte		Result	PQL SPK value	SPK Ref Val %REC	LowLimit HighLimit RPD Ref	Val %RPD RPDLimit Qual
Enterococci		>24100	10.0		24,1	00 0 20

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

SDL Sample detection limit

ND Not Detected at the Reporting Limit

U Analyte not detected

RL Reporting Limit W Sample container temperature is



Sample Log-In Check List

Clier	nt Name:	EAST_BR_PRETREATM	Work Order Number:	20020242		RcptNo:	1
Log	ged by:	Danielle Hollier	2/6/2020 5:05:00 PM		Danith	Hollin	
Corr	pleted By:	Danielle Hollier	2/6/2020 5:22:40 PM		Danielles Danielles Cutlis Duplies	Hollin	
Revi	ewed By:	Caitlin Duplantis	2/7/2020 2:03:12 PM		Caitlin Dupla	tų_	
<u>Cha</u>	in of Cus	stody					
1.	Is Chain of	Custody complete?		Yes 🔽	No 🗌	Not Present	
2.	How was th	e sample delivered?		<u>Client</u>			
Log	In						
-	Coolers are	present?		Yes 🖌	No 🗌		
1	Shipping co	ontainer/cooler in good condi	tion?	Yes 🖌	No 🗌		
ч.		als intact on shipping contai		Yes		Not Present 🗹	
	No.	Seal Da		Signed By:	:		
5.		empt made to cool the samp		Yes 🗹	No 🗌	NA 🗌	
6.	Were all sa	mples received at a tempera	ture of >0° C to 6.0°C	Yes 🖌	No 🗌		
7.	Sample(s) i	n proper container(s)?		Yes 🖌	No 🗌		
8.	,	ample volume for indicated to	est(s)?	Yes 🔽	No 🗌		
		s (except VOA and ONG) p		Yes 🗸	No 🗌		
-		rvative added to bottles?		Yes 🗌	No 🖌	NA 🗌	
11.	Is the heads	space in the VOA vials less	than 1/4 inch or 6 mm?	Yes 🗌	No 🗌	No VOA Vials 🖌	
12.	Were any s	ample containers received b	roken?	Yes	No 🖌		
13.		work match bottle labels? epancies on chain of custody	<i>i</i>)	Yes 🖌	No 🗌		
14.	Are matrice	s correctly identified on Cha	in of Custody?	Yes 🖌	No 🗌		
15.	Is it clear w	hat analyses were requested	!?	Yes 🔽	No 🗌		
16.		lding times able to be met? / customer for authorization.)		Yes 🖌	No 🗌		
<u>Spe</u>		dling (if applicable)					
-		notified of all discrepancies	with this order?	Yes	No	NA 🔽	
	Perso	n Notified:	Date:				
	By WI		Via:	eMail	Phone 🗌 Fax	In Person	
	Regar	·	via.				
		Instructions:					
18.	Additional re	ļ					

Cooler Information

Cooler No	Temp ºC	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.5	Good	Not Present			

20020242



Chain of Custody Record for Fecal Coliform Testing

Wastewater Treatment Laboratory 2443 River Rd. Baton Rouge, LA 70802

Sampler Name	Date	Time Taken	Site/Location	Comments/Remarks
WILLEAM FISHBURN	2/6/20	2:41 m	Port Hudson Probel Contra Rinn	CRN -0220 - W
AL CLASS				
		and the		
				*

Relinquished By:	Received By:	Time:	Date:
Jug young	on.	1705	2-6-20
10 (1 '			

Tempi 2.5% SHIRID

Page 7 of 7



February 10, 2020

Sarah Boudreaux East Baton Rouge Parish Pretreatment Division 345 Chippewa St. Baton Rouge, LA 70805 TEL: FAX:

RE: WC-0220-D

Order No.: 20020240

Dear Sarah Boudreaux:

Element Materials Technology Lafayette received 1 sample(s) on 2/6/2020 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

Where applicable, all soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as –dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA023. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

Estimated uncertainty is available upon request. This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions regarding these test results, please feel free to call.

Junos

Cristina Thibeaux Customer Service Supervisor 2417 W. Pinhook Road Lafayette, LA 70508-3344



Case Narrative

WO#:	20020240
Date:	2/10/2020

CLIENT:	East Baton Rouge Parish Pretreatment Divi
Project:	WC-0220-D

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

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Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



Analytical Report

 (consolidated)

 WO#:
 20020240

 Date Reported:
 2/10/2020

CLIENT:	East Baton Rouge Pa	arish Pretreatmen	nt Division	Collection Date	e: 2/6/2	020 3:35:00 PM
Project:	WC-0220-D					
Lab ID:	20020240-001			Matrix	AQU	EOUS
Client Sample	ID WC-0220-D					
Analyses		Result	RL Qua	l Units	DF	Date Analyzed
ENTEROCOCO	CI BY IDEXX ENTEROLI	ERT-E WITH QU	ANTI-TRAY	SM9230I)	Analyst: BXB
ENTEROCOCO Enterococci	CI BY IDEXX ENTEROLI	ERT-E WITH QU >24100	ANTI-TRAY 10.0	SM9230I MPN/100mL) 10	Analyst: BXB 2/6/2020 5:45:00 PM
Enterococci	CI BY IDEXX ENTEROLI ORM USING COLILERT	>24100	10.0		10	

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

SDL Sample detection limit

Н

W Sample container temperature is out of limit as specified at testcode

M Matrix Interference

RL Reporting Limit



QC SUMMARY REPORT

WO#: 20020240

10-Feb-20

Client: Project:	East Baton 1 WC-0220-D	Rouge Parish Pretreatn	nent Division		BatchID:	R85909	
Sample ID: Client ID:	MB-85909 PBW	SampType: MBLK Batch ID: R85909	TestCode: FECAL_CO TestNo: Colilert-18	LI Units: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152454	
Analyte		Result	PQL SPK value	SPK Ref Val %REC	LowLimit HighLimit RPD Ref Va	l %RPD RPDLimit Q	Qual
Fecal Colifo	rm	< 1.0	1.0				-
	20020240-001ADUP WC-0220-D	SampType: DUP Batch ID: R85909	TestCode: FECAL_CO TestNo: Colilert-18	LI Units: MPN/100mL	Prep Date: Analysis Date: 2/6/2020	RunNo: 85909 SeqNo: 2152456	
Analyte		Result	PQL SPK value	SPK Ref Val %REC	LowLimit HighLimit RPD Ref Va	l %RPD RPDLimit Q	Qual
Fecal Colifor	rm	>24100	10.0		24,100	0 20	

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



QC SUMMARY REPORT

WO#: 20020240

10-Feb-20

Client: Project:	East Baton 1 WC-0220-D	Rouge Parish Pretreatm	ent Division			BatchID:	R85950	
Sample ID:		SampType: MBLK	TestCode: ENTER				RunNo: 85950	
Client ID:	PBW	Batch ID: R85950	TestNo: SM923	0D	Analysis Da	te: 2/6/2020	SeqNo: 2153134	
Analyte		Result	PQL SPK valu	ue SPK Ref Val %	REC LowLimit	HighLimit RPD Ref Va	al %RPD RPDLi	mit Qual
Enterococci		< 1.0	1.0					
Sample ID:	20020238-001ADUP	SampType: DUP	TestCode: ENTER	OCOC Units: MPN/100ml	Prep Da	te:	RunNo: 85950	
Client ID:	ZZZZZZ	Batch ID: R85950	TestNo: SM923	0D	Analysis Da	te: 2/6/2020	SeqNo: 2153140	
Analyte		Result	PQL SPK valu	ue SPK Ref Val %	REC LowLimit	HighLimit RPD Ref Va	al %RPD RPDLi	mit Qual
Enterococci		>24100	10.0			24,10	0 0	20

Qualifiers: H Holding times for preparation or analysis exceeded

M Matrix Interference

RL Reporting Limit

W Sample container temperature is out of limit as specified at testcode

SDL Sample detection limit

ND Not Detected at the Reporting Limit



Sample Log-In Check List

Clier	nt Name:	EAST_BR_PRETREATM	Work Order Number:	20020240		RcptNo:	1
Log	ged by:	Danielle Hollier	2/6/2020 5:05:00 PM		Danith	Hollin	
Corr	npleted By:	Danielle Hollier	2/6/2020 5:19:21 PM		Danith Danith Caitlin Duplan	Hollin	
Revi	ewed By:	Caitlin Duplantis	2/7/2020 2:01:09 PM		Caitlin Duptan	Tų	
<u>Cha</u>	in of Cus	stody					
1.	Is Chain of	Custody complete?		Yes 🔽	No 🗌	Not Present	
2.	How was th	e sample delivered?		<u>Client</u>			
100	In						
<u>Log</u> 3.	Coolers are	present?		Yes 🗸	No 🗌		
1	Shippina co	ontainer/cooler in good condit	ion?	Yes 🖌	No 🗌		
4.		als intact on shipping contain		Yes	No 🗌	Not Present ✔	
	No.	Seal Da		Signed By:			
5.		empt made to cool the sample		Yes 🖌	No 🗌	NA 🗌	
6.	Were all sa	mples received at a temperat	ure of >0° C to 6.0°C	Yes 🖌	No 🗌	NA 🗌	
7.	Sample(s) i	n proper container(s)?		Yes 🔽	No 🗌		
8.	• • • •	ample volume for indicated te	est(s)?	Yes 🖌	No 🗌		
		s (except VOA and ONG) pr		Yes 🖌	No 🗌		
-		rvative added to bottles?		Yes	No 🖌	NA 🗌	
11.	Is the heads	space in the VOA vials less t	han 1/4 inch or 6 mm?	Yes	No 🗌	No VOA Vials ✔	
12.	Were any s	ample containers received br	oken?	Yes	No 🖌		
13.		work match bottle labels? epancies on chain of custody)	Yes 🖌	No 🗌		
14.	Are matrice	s correctly identified on Chai	n of Custody?	Yes 🔽	No 🗌		
15.	Is it clear w	hat analyses were requested	?	Yes 🔽	No 🗌		
16.		Iding times able to be met? v customer for authorization.)		Yes 🗹	No 🗌		
<u>Spe</u>		dling (if applicable)					
-		notified of all discrepancies v	vith this order?	Yes	No	NA 🗹	
	Perso	n Notified:	Date:				
	By WI		Via:	eMail F	Phone 🗌 Fax	In Person	
	Regar	,			· · · · · · · ·		
		Instructions:					
18.	Additional re	emarks:					

Cooler Information

Cooler No	Temp ºC	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	2.5	Good	Not Present			

20020240



Chain of Custody Record for Fecal Coliform Testing

Wastewater Treatment Laboratory 2443 River Rd. Baton Rouge, LA 70802

Sampler Name	Date	Time Taken	Site/Location	Comments/Remarks
W. Fishburn	2620	3:35pm	Highland Rd / Ward Creek	WC-0220-D
33. Mg	1 Sultan			
Acres States				
	1			
			A AND	
				4

Relinquished By:	Received By:	Time:	Date:
ph for	0-	1705	2-6-20
		a and a second	

Temp: 2.5°L DHIRIU

Environmental Results Monitoring Program Phase 2 Quarter 5 Results

Memorandum

100 North Street, Suite 901 Baton Rouge, LA 70802

www.jacobs.com

Subject	Environmental Results Monitoring Program Phase 2, Quarter 5 Results	Project Name	Baton Rouge SSOP
Attention	Mr. Richard Speer, P.E. Director, Department of Environmental Services City of Baton Rouge, Louisiana	Project No.	BTRSSO16
From	Patrick Gervais		
Date	June 16, 2020		

Purpose

On April 29, 2020, the City of Baton Rouge, Parish of East Baton Rouge conducted the 5th quarterly Phase 2 Baseline Monitoring event, as required by the 2002 Consent Decree. The purpose of this memorandum is to characterize the rain event, summarize the sampling procedures, and report laboratory analysis results. Background information on the Environmental Results Monitoring (ERM) program can be found in the ERM Plan (Exhibit G of the Consent Decree).

Rain Event

Rainfall data was recorded at USGS monitoring stations located upstream of each of the designated sample locations. The locations of the observed USGS monitoring stations are shown in Figure 1.

Cumulative precipitation from the rain event over April 26 to May 1st, 2020 is shown in Figure 2. The rainfall during this period arrived in two waves, with the first wave starting April 28th at 3:00 PM and lasting until 9:00 PM. The most intense rainfall for this wave (which was also the most intense rainfall period over the entire period) occurred at 4:00 PM. A second wave of rainfall began on April 29th starting at 5:00 AM and lasted until 9:00 AM. The most intense rainfall for this wave occurred at 6:00 AM. A summary of the rainfall at each sample site is provided in Table 1.

Previous reports included precipitation data collected at the USGS Comite River Port Hudson gage, however the precipitation gage appears to have failed for this event and no rainfall was recorded.

Procedures

One grab sample was taken from each of the five designated sample sites between the hours of 9:52 AM and 11:20 AM. Samples were taken from the approximate center of each stream. Grab samples from each site were poured into three separate laboratory-prepared sample containers, which were labeled with the

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 5 Results

sample date, time, and location name immediately following sample collection. Samples were stored on ice and delivered to the laboratory immediately following collection of the final sample.

All samples were analyzed at a laboratory for the parameters established in the ERM plan, which include fecal coliform and enterococcus. Sample holding times and laboratory procedures conformed with those outlines in the USEPA "Methods for Chemical Analysis of Water and Wastes", 1983, and USEPA "Test Methods for the Examination of Solid Waste – SW846", 1992.

Results

Results of laboratory analyses are summarized in Table 2. Further analysis of these results based on future water quality and stream flow data will be conducted upon completion of Phase I Baseline Monitoring. Gage height data from April 26 to May 1st, 2020, recorded at USGS stream flow monitoring stations upstream of each sample location, are shown in Figure 3.

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 5 Results

Tables

Table 1: Rainfall Summary for Phase 2, Quarter 5

Location	Sample Date and Time	Peak Intensity Date and Time	Peak Intensity (in/hr)	Total Rainfall (in)
Baton Rouge Metro Airport ^a	4/29/20 11:20 AM	4/28/20 4:00 PM	1.03	3.16
Bayou Fountain at Grand Lakes Dr.	4/29/20 9:52 AM	4/28/20 6:30 PM	1.92	3.76
Comite R. at Port Hudson-Pride Rd.	4/29/20 10:40 AM	4/28/20 4:00 PM	0.00	0.00
Jones Cr. at O'Neal Ln.	4/29/20 10:37 AM	4/29/20 5:30 AM	1.17	3.42
Ward Cr. at Highland Rd.	4/29/20 10:12 AM	4/28/20 6:45 PM	1.70	4.00

^a The Comite River at Greenwell Springs gage does not have a precipitation gage. The hourly rainfall recorded at Baton Rouge airport is listed as a substitute for rainfall recorded at the gage.

in: Inches; hr: Hour

Table 2: Water Quality Sampling Results for Phase 2, Quarter 5

Location	Sample Date and Time	Enterococci (MPN/100 mL)	Fecal Coliform (MPN/ 100 mL)
Comite R. at Greenwell Springs Rd.	4/29/20 11:20 AM	> 4,820	> 4,820
Bayou Fountain at Grand Lakes Dr.	4/29/20 9:52 AM	> 4,820	> 4,820
Comite R. at Port Hudson-Pride Rd.	4/29/20 10:40 AM	> 4,820	> 4,820
Jones Cr. at O'Neal Ln.	4/29/20 10:37 AM	> 4,820	> 24,100
Ward Cr. at Highland Rd.	4/29/20 10:12 AM	> 9,640	> 4,820

MPN: Most Probable Number; mL: Milliliters

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 5 Results

Figures



Figure 1: Sampling Locations

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 5 Results



Figure 2: Cumulative Precipitation – February 4-8, 2020

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 5 Results



Figure 3: USGS Gage Height – April 26 – May 1, 2020

Environmental Results Monitoring Program Phase 2 Quarter 6 Results

Memorandum

100 North Street, Suite 901 Baton Rouge, LA 70802

www.jacobs.com

Subject	Environmental Results Monitoring Program Phase 2, Quarter 6 Results	Project Name	Baton Rouge SSOP
Attention	Mr. Richard Speer, P.E. Director, Department of Environmental Services City of Baton Rouge, Louisiana	Project No.	BTRSSO16
From	Patrick Gervais		
Date	October 22, 2020		

Purpose

On September 24, 2020, the City of Baton Rouge, Parish of East Baton Rouge conducted the 6th quarterly Phase 2 Baseline Monitoring event, as required by the 2002 Consent Decree. The purpose of this memorandum is to characterize the rain event, summarize the sampling procedures, and report laboratory analysis results. Background information on the Environmental Results Monitoring (ERM) program can be found in the ERM Plan (Exhibit G of the Consent Decree).

Rain Event

Rainfall data was recorded at USGS monitoring stations located upstream of each of the designated sample locations. The locations of the observed USGS monitoring stations are shown in Figure 1.

Cumulative precipitation from the rain event over September 23 - 24, 2020 is shown in Figure 2. The event lasted approximately 24 hours, with the highest-intensity rainfall occurring around 10:00 AM and 6:30 PM on the 24th. A summary of the rainfall at each sample site is provided in Table 1.

Procedures

One grab sample was taken from each of the five designated sample sites between the hours of 10:15 AM and 11:57 AM. Samples were taken from the approximate center of each stream. Grab samples from each site were poured into three separate laboratory-prepared sample containers, which were labeled with the sample date, time, and location name immediately following sample collection. Samples were stored on ice and delivered to the laboratory immediately following collection of the final sample.

All samples were analyzed at a laboratory for the parameters established in the ERM plan, which include fecal coliform and enterococcus. Sample holding times and laboratory procedures conformed with those outlines in the USEPA "Methods for Chemical Analysis of Water and Wastes", 1983, and USEPA "Test Methods for the Examination of Solid Waste – SW846", 1992.

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 6 Results

Results

Results of laboratory analyses are summarized in Table 2. Further analysis of these results based on future water quality and stream flow data will be conducted upon completion of Phase I Baseline Monitoring. Gage height data from September 23 - 24, 2020, recorded at USGS stream flow monitoring stations upstream of each sample location, are shown in Figure 3.

Environmental Results Monitoring Program Phase 2, Quarter 6 Results

Tables

Table 1: Rainfall Summary for Phase 2, Quarter 6

Location	Sample Date and Time	Peak Intensity Date and Time	Peak Intensity (in/hr)	Total Rainfall (in)
Baton Rouge Metro Airport ^a	9/24/20 11:03 AM	9/23/20 5:50 PM	0.27	1.00
Bayou Fountain at Grand Lakes Dr.	9/24/20 10:50 AM	9/23/20 10:00 AM	0.31	0.91
Comite R. at Port Hudson-Pride Rd.	9/24/20 11:57 AM	9/23/20 7:00 PM	0.21	0.71
Jones Cr. at O'Neal Ln.	9/24/20 10:15 AM	9/23/20 10:00 AM	0.30	0.80
Ward Cr. at Highland Rd.	9/24/20 10:28 AM	9/23/20 10:30 AM	0.60	0.80

^a The Comite River at Greenwell Springs gage does not have a precipitation gage. The hourly rainfall recorded at Baton Rouge airport is listed as a substitute for rainfall recorded at the gage.

in: Inches; hr: Hour

Table 2: Water Quality Sampling Results for Phase 2, Quarter 6

Location	Sample Date and Time	Enterococci (MPN/100 mL)	Fecal Coliform (MPN/ 100 mL)
Comite R. at Greenwell Springs Rd.	9/24/20 11:03 AM	6,490	4,610
Bayou Fountain at Grand Lakes Dr.	9/24/20 10:50 AM	4,110	2,360
Comite R. at Port Hudson-Pride Rd.	9/24/20 11:57 AM	6,130	< 10
Jones Cr. at O'Neal Ln.	9/24/20 10:15 AM	8,160	>24,100
Ward Cr. at Highland Rd.	9/24/20 10:28 AM	6,130	8,160

MPN: Most Probable Number; mL: Milliliters

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 6 Results

Figures



Figure 1: Sampling Locations

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 6 Results



Figure 2: Cumulative Precipitation – September 23 - 24, 2020

Memorandum

Environmental Results Monitoring Program Phase 2, Quarter 6 Results



Figure 3: USGS Gage Height – September 23 - 24, 2020



September 28, 2020

Sarah Boudreaux East Baton Rouge Parish Pretreatment Division 345 Chippewa St. Baton Rouge, LA 70805 TEL: FAX

RE: EBR/ERM

Dear Sarah Boudreaux:

Order No.: 20090881

Element Materials Technology Lafayette received 5 sample(s) on 9/24/2020 for the analyses presented in the following report.

In accordance with your instructions Element Lafayette conducted the analysis shown on the following pages on samples submitted by your company. The results related only to the items tested. Unless otherwise noted, all analyses were conducted using EPA approved methodologies and all test results meet all requirements of TNI. All relevant sampling information is on the attached Chain-of-Custody form.

Where applicable, all soil data, except for 29-B, are on a wet-weight basis unless otherwise indicated in the units field as –dry.

LELAP Certification No.: 01997. TCEQ Certification No.: T104704261. LDHH Certification No.: LA023. ISDH Certification No.: C-LA-01. NDELCP Certification No.: R-226. A scope of accredited parameters is available upon request. A "#" by the test method or analyte indicates this parameter is outside the scope of accreditation.

Estimated uncertainty is available upon request. This report shall not be reproduced except in full, without the written approval of the laboratory.

If you have any questions regarding these test results, please feel free to call.

source

Cristina Thibeaux Customer Service Supervisor 2417 W. Pinhook Road Lafayette, LA 70508-3344



Case Narrative

WO#:	20090881
Date:	9/28/2020

CLIENT: East Baton Rouge Parish Pretreatment Division Project: EBR/ERM

Unless specified by the client, a duplicate or MS/MSD, wherever applicable, is randomly selected and analyzed from each analytical batch provided sample volume is sufficient. The sample chosen for duplicate or MS/MSD may or may not be a sample submitted in this workorder. A method blank and/or a lab control sample (LCS)/lab control sample duplicate (LCSD), wherever applicable, are processed as a quality control check for each analytical batch. When the matrix QC data is not available due to insufficient sample volume or when the results indicate possible matrix effect, the validity of the batch is determined by the method blank and LCS/LCSD.

The results of the laboratory internal quality control data are provided in the QC Summary Report section of the report for your review. Laboratory-related QC exceptions that may impact the validity of data are discussed in the case narrative. Sample-related QC exceptions are flagged either in the results page(s) or in the QC report page(s). End users should consider QC exceptions when evaluating sample data against data quality objectives.

Exception- Fecal Coliform: Due to an oversight by the laboratory personnel, the 8 hour hold time for the start of the Fecal Coliform analysis for the submitted sample, JC-0920-W (lab ID: 20090881-004) was exceeded by 13 minutes. Upon discovery, the client was informed of the oversight and the lab was authorized to continue with requested analysis though the sample will be recollected at a later date for this parameter. The analytical results for the Fecal Coliform will be reported with a hold time (H) qualifier.

Any other exceptions associated with this report will be footnoted in the results page(s) or the QC summary page(s).



Analytical Report

(consolidated) WO#: 20090881 Date Reported 9/28/2020

CLIENT:	East Baton Rouge Pa	rish Pretreatmer	nt Division	Collection Date	e: 9/24/2	2020 11:03:00 AM
Project: Lab ID: Client Sample	EBR/ERM 20090881-001 ID CR-0920-W			Matrix	: AQU	EOUS
Analyses		Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOC	CI BY IDEXX ENTEROLI	ERT-E WITH QU	ANTI-TRAY	SM9230[)	Analyst: JH
ENTEROCOC Enterococci	CI BY IDEXX ENTEROLI	ERT-E WITH QU 6,490	ANTI-TRAY 10.0	SM9230E MPN/100mL) 10	Analyst: JH 9/24/2020 6:28:00 PM
Enterococci	CI BY IDEXX ENTEROLI	6,490	10.0		10	

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit RL

Reporting Limit

Н

U Analyte not detected М Matrix Interference

R RPD outside accepted recovery limits

SDL Sample detection limit



Analytical Report

 (consolidated)

 WO#:
 20090881

 Date Reported
 9/28/2020

CLIENT:	East Baton Rouge P	arish Pretreatmer	nt Division	Collection Date	e: 9/24/2	2020 11:57:00 AM
Project: Lab ID:	EBR/ERM 20090881-002			Matrix	: AQUI	EOUS
Client Sample ID						
Analyses		Result	RL Qual	Units	DF	Date Analyzed
				0140000		An church III
ENTEROCOCCI I	BY IDEXX ENTEROL	ERT-E WITH QU 6,130	IANTI-TRAY 10.0	SM9230E MPN/100mL) 10	Analyst: JH 9/24/2020 6:28:00 PM
Enterococci	BY IDEXX ENTEROL	6,130	10.0		10	

Note: The reporting limit was elevated due to limited sample.

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

RL Reporting Limit

Н

U Analyte not detected

M Matrix Interference

R RPD outside accepted recovery limits

SDL Sample detection limit



Analytical Report

 (consolidated)

 WO#:
 20090881

 Date Reported
 9/28/2020

CLIENT: Project:	East Baton Rouge I EBR/ERM	Parish Pretreatmer	nt Division	Collection Date	e: 9/24/2	2020 10:28:00 AM
Lab ID: Client Sample I	20090881-003			Matrix	AQUI	EOUS
Analyses	D wC-0920-w	Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOCO	CI BY IDEXX ENTERO	LERT-E WITH QU	IANTI-TRAY	SM9230[)	Analyst: JH
Enterococci		6,130	10.0	MPN/100mL	10	9/24/2020 6:28:00 PM
		-,				5/2-1/2020 0.20.00 T M
FECAL COLIF	ORM USING COLILER			COLILERT		Analyst: JH

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

RL Reporting Limit

Н

U Analyte not detected

M Matrix Interference

R RPD outside accepted recovery limits

SDL Sample detection limit



Analytical Report

 (consolidated)

 WO#:
 20090881

 Date Reported
 9/28/2020

CLIENT:	East Baton Rouge I	Parish Pretreatmer	nt Division	Collection Date	e: 9/24/2	2020 10:15:00 AM
Project:	EBR/ERM					
Lab ID:	20090881-004			Matrix	: AQU	EOUS
Client Sample I	D JC-0920-W					
Analyses		Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOCC				SM9230F	<u> </u>	Analyst: IH
ENTEROCOCC Enterococci	I BY IDEXX ENTERO	LERT-E WITH QU 8,160	ANTI-TRAY 10.0	SM9230D) 10	Analyst: JH 9/24/2020 6:28:00 PM
Enterococci	I BY IDEXX ENTERO	8,160	10.0		10	

H: Sample was analyzed 13 minutes outside of 8 hour hold time.

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

RL Reporting Limit

Н

U Analyte not detected

M Matrix Interference

R RPD outside accepted recovery limits

SDL Sample detection limit



Analytical Report

 (consolidated)

 WO#:
 20090881

 Date Reported
 9/28/2020

CLIENT:	East Baton Rouge Pa	arish Pretreatmer	nt Division	Collection Date	e: 9/24/2	2020 10:50:00 AM
Project:	EBR/ERM					
Lab ID:	20090881-005			Matrix	AQUI	EOUS
Client Sample I	D BF-0920-W					
Analyses		Result	RL Qual	Units	DF	Date Analyzed
ENTEROCOCC	BY IDEXX ENTEROL	ERT-E WITH QU	IANTI-TRAY	SM9230[)	Analyst: JH
ENTEROCOCC Enterococci	I BY IDEXX ENTEROL	ERT-E WITH QU 4,110	IANTI-TRAY	SM9230E MPN/100mL) 10	Analyst: JH 9/24/2020 6:28:00 PM
Enterococci	I BY IDEXX ENTEROL	4,110	10.0		10	

Qualifiers:

Holding times for preparation or analysis exceeded

ND Not Detected at the Reporting Limit

RL Reporting Limit

Н

U Analyte not detected

M Matrix Interference

R RPD outside accepted recovery limits

SDL Sample detection limit



QC SUMMARY REPORT

WO#: 20090881

01-Oct-20

Client: East Baton Roug Project: EBR/ERM	ge Parish Pretreatment D	ivision	BatchID: R92654						
Sample ID: MB-R92654 Client ID: PBW Analyte	SampType: MBLK Batch ID: R92654 Result	TestCode: FECAL_COLI Units: MPN/100mL TestNo: Colilert-18 PQL SPK value SPK Ref Val %REC	Prep Date: Analysis Date: 9/24/2020 LowLimit HighLimit RPD Ref Val	RunNo: 92654 SeqNo: 2292950 %RPD RPDLimit Qual					
Fecal Coliform	< 1.0	1.0							
Sample ID: 20090835-002ADUP Client ID: ZZZZZZ	SampType: DUP Batch ID: R92654	TestCode: FECAL_COLI Units: MPN/100mL TestNo: Colilert-18	Prep Date: Analysis Date: 9/24/2020	RunNo: 92654 SeqNo: 2292953					
Analyte	Result	PQL SPK value SPK Ref Val %REC	LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual					
Fecal Coliform NOTES:	3.0	1.0	4.1	31.0 20 R					

R - High RPD due to suspected sample non-homogeneity.

Qualifiers:

M Matrix Interference

RL

Reporting Limit

RPD outside accepted recovery limits

U Analyte not detected

R

W Sample container temperature is out of limit as specified at testcode

ND Not Detected at the Reporting Limit

SDL Sample detection limit

Page 8 of 12



Element Materials Technology Lafayette 2417 W. Pinhook Road Lafayette, LA 70508-3344 TEL: (337) 235-0483 FAX: (337) 233-6540 Website: www.element.com

QC SUMMARY REPORT

WO#: 20090881

01-Oct-20

Client:East Baton RouProject:EBR/ERM	ge Parish Pretreatment Di	ivision	BatchID:	92662		
Sample ID: MB-R92662	SampType: MBLK	TestCode: FECAL_COLI Units: MPN/100mL	Prep Date:	RunNo: 92662		
Client ID: PBW	Batch ID: R92662	TestNo: Colilert-18	Analysis Date: 9/24/2020	SeqNo: 2292963		
Analyte	Result	PQL SPK value SPK Ref Val %REC	C LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual		
Fecal Coliform	< 1.0	1.0				
Sample ID: 20090881-001ADUP	SampType: DUP	TestCode: FECAL_COLI Units: MPN/100mL	Prep Date:	RunNo: 92662		
Client ID: CR-0920-W	Batch ID: R92662	TestNo: Colilert-18	Analysis Date: 9/24/2020	SeqNo: 2292965		
Analyte	Result	PQL SPK value SPK Ref Val %REC	C LowLimit HighLimit RPD Ref Val	%RPD RPDLimit Qual		
Fecal Coliform	4,350	10.0	4,611	5.8 20		

Qualifiers:

RPD outside accepted recovery limits

М Matrix Interference

RL Reporting Limit

U Analyte not detected

R

W Sample container temperature is out of limit as specified at testcode ND Not Detected at the Reporting Limit

SDL Sample detection limit



QC SUMMARY REPORT

WO#: 20090881

01-Oct-20

Client: East Baton Roug Project: EBR/ERM	e Parish Pretreatment Di	BatchID: R92663		
Sample ID: MB-R92663 Client ID: PBW	SampType: MBLK Batch ID: R92663	TestCode: ENTEROCOC Units: MPN/100mL TestNo: SM9230D	Prep Date: RunNo: 92663 Analysis Date: 9/24/2020 SeqNo: 2293609	
Analyte	Result	PQL SPK value SPK Ref Val %REC	LowLimit HighLimit RPD Ref Val %RPD RPDLimit	Qual
Enterococci	1.0	1.0		
Sample ID: 20090881-001ADUP Client ID: CR-0920-W	SampType: DUP Batch ID: R92663	TestCode: ENTEROCOC Units: MPN/100mL TestNo: SM9230D	Prep Date: RunNo: 92663 Analysis Date: 9/24/2020 SeqNo: 2293611	
Analyte	Result	PQL SPK value SPK Ref Val %REC	LowLimit HighLimit RPD Ref Val %RPD RPDLimit	Qual
Enterococci	5,790	10.0	6,488 11.3 20	

Qualifiers:

М Matrix Interference

RL Reporting Limit

RPD outside accepted recovery limits U Analyte not detected

R

W Sample container temperature is out of limit as specified at testcode ND Not Detected at the Reporting Limit

SDL Sample detection limit



Sample Log-In Check List

Clier	nt Name:	EAST_BR_F	RETREATM	Work Order N	Number:	20090881		RcptNo: 1	1
Log	ged by:	Danielle Hol	lier	9/24/2020 5:49	9:00 PM		Danis	Hollin	
•							Danith Danith	11 1/	
Corr	pleted By:	Danielle Hol	lier	9/24/2020 5:58	3:45 PM		Janny	Hollin	
Revi	ewed By:	Caitlin Dupla	antis	9/25/2020 2:28	3:35 PM		Cantlin Dupta	The state of the s	
<u>Cha</u>	in of Cus	<u>stody</u>							
1.	Is Chain of	Custody com	olete?			Yes 🖌	No	Not Present	
2.	How was th	ne sample deli	vered?			<u>Client</u>			
Log	In								
-	Coolers are	e present?				Yes 🖌	No 🗌	NA 🗌	
4.	Shipping co	ontainer/coole	r in good conditio	on?		Yes 🖌	No 🗌		
	Custody se	als intact on s	hipping containe	r/cooler?		Yes 🗌	No 🗌	Not Present 🗹	
	No.		Seal Date:			Signed By:		_	
5.	Was an att	empt made to	cool the sample	s?		Yes 🗸	No 🗌	NA 🗌	
6.	Were all sa	amples receive	ed at a temperatu	ure of >0° C to 6.	0°C	Yes 🖌	No 🗌		
7.	Sample(s)	in proper cont	ainer(s)?			Yes 🖌	No 🗌		
8.	Sufficient s	ample volume	for indicated tes	st(s)?		Yes 🗌	No 🔽		
9.	Are sample	es (except VO	A and ONG) prop	perly preserved?		Yes 🖌	No 🗌		
10.	Was prese	rvative added	to bottles?			Yes	No 🖌	NA 🗌	
11.	Is the head	Ispace in the V	OA vials less th	an 1/4 inch or 6 m	nm?	Yes	No 🗌	No VOA Vials 🗹	
12.	Were any s	sample contair	ners received bro	oken?		Yes 🗌	No 🔽		
13.		rwork match b	ottle labels? hain of custody)			Yes 🗌	No 🗹		
14			entified on Chain	of Custody?		Yes 🔽	No 🗌		
		-	were requested?	-		Yes 🖌	No 🗌		
16.	Were all ho	olding times at	ble to be met?			Yes	No 🗹		
		•	authorization.)						
-		dling (if app notified of all (DIICADIE) discrepancies wi	th this order?		Yes 🖌	No 🗌		
17.			-		_]
		on Notified:	Sarah Boudrea		Date:		9/25/2020	_	
	By W		Caitlin Duplanti				hone 🗌 Fax	In Person	
	Rega	-	Only one samp	le bottle received	per samp	ole. Holding tim	ne for JC-0920-V	V missed.	
	Client	Instructions:	Proceed and re	port.					

18. Additional remarks:

Corrected quantities of samples received on COC.

Cooler Information

	Cooler No	Temp ºC	Condition	Seal Intact	Seal No	Seal Date	Signed By
1	L	4.3	Good	Not Present			

Client Information:		Bi	Billing Information:				PO Number:			Proie	Project Name:				Page of		
Company	East Baton Rou		10 mm	ime	Contract Rates			es	EBR ERM				Matrix Code				
Name: Contact Name:									Quote Number:		-	DK	FR			DW = Drinking Water	
Address: 345 Chippewa St. City, State Zip: Baton Rouge, LA 70805		3					4705			Samp	ler's Si	gnature		1912	- WW = Waste Water GW = Ground Water		
							Required C	C Lev	el	4	-	5	Z	-	AQ = Aqueous OT = Other		
			Construction and the second				non in the					_		2.24	SL = Sludge SOL = Solid O = Oil SO = Soil		
Phone Number:	225-389-5456	Ext:		Ext:				Bill Monthly	0		Shipp	ing Met	hod:			F = Food SW = Swab	
Mobile Number:	225-615-0661					and a		Yes			L	IPS /	FedEx /	Airbo	orne	NGL = Natural Gas Liquid	
E-mail Address:	saboubreaux@br	la.gov		Call Mar	2100	19912		No			DH	L / Ele	ment / (Hand	/ Mail	PW = Produced Water CF = Completion Fluid	
Which Regulat	ions Apply:	Turn Time		(Rush tur will incur	Collected and a large	Cor	ntainer	Pres.			Re	quest	ed Tes	ts		Comments	
□RCRA □POTW □NPDES □USDA/FDA □RECAP/RISC	Drinking Water Distribution Special State Other	Standan RUSH 1 Day 2 Day Other		surcharge must be p approved lab.)	ore-	tity	Type P=Plastic, G=Glass, V=Vial	HCI, HNO3, H2SO4 NaOH, Na2S2O3	al	Enterococci						- Maria	
		Collect	ion Inform			Quantity	-Gla	N, H	Fecal	nte		1386					
ample ID/Des		Date	Time	Grab / Composite	Matrix	a	Contract of the local division of the local					012					
R-092	0-W	4/24/20	11:03		AG	71	P	Na ₂ S ₂ O ₃	X	X			5.2.13	_			
RN-097		9/24/20	11:57A	1	AG	- 21	P	Na ₂ S ₂ O ₃	X	X				1		and a state of the	
NC - 092		9/24/20	10:250		AG	2	P	Na ₂ S ₂ O ₃	X	X							
C - 092	the second	8/24/20		GRAB	AG	ť.	P	Na ₂ S ₂ O ₃	X	X							
F - 097	20 - W	9/24/20	10:501	GRAB	AG	F	-	Na ₂ S ₂ O ₃	X	X							
	n. •					24-24	20							-			
	1.00	-	1.12.11											-		COC revision eff: 10/10/17	
7	Relinguished by		Da	te/Time			Recei	ved by				Date/	Time		Field N	lotes:	
	YOUNG		the second s	20 17	49		14				9-3	and the second second	01	XIA		ioica.	
2 .			1			6	-	S. A. A.			10		~ ()		Receiv	red at lab on ice? A	
3	•			1 1 1 1 1 1	Contra Contra	710-50	1 (1						0.0000	1 Ves	□No Temp: 4,2%	

All samples submitted to Element Materials Technology for analysis are accepted on a custodial basis only. Ownership of the material remains with the client submitting the samples. Element Materials Technology reserves the right to return unused sample portions.

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