BATON ROUGE SSO PROGRAM 2002 CONSENT DECREE



2018 ANNUAL REPORT

January 30, 2019



January 30, 2019

CERTIFIED - RETURN RECEIPT REQUESTED

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

Re: City of Baton Rouge and Parish of East Baton Rouge Consent Decree-Civil Action No. 01-978-B-M3 Annual Report - Period Ending December 31, 2018

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, 2018. 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 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.

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

Sincerely yours,

Richard Speer, PE

Environmental Services Director

cc: Honorable Sharon Weston Broome, Mayor-President

Darryl Gissel, 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. Joseph Young, Jacobs

Ms. Elizabeth Gibert, Jacobs

Mr. Carlos Giron, Jacobs

Mr. Adam Smith

Ms. Cheryl Berry

Mr. Stan Redmond

Mr. Mark LeBlanc

Mr. John Ward

Mr. Paul Nata



DATE:

January 30, 2019

TO:

Mr. Adam Smith, DES

FROM:

Ms. Elizabeth Gibert, Jacobs

SUBJECT:

City of Baton Rouge and Parish of East Baton Rouge

Consent Decree-Civil Action No. 01-978-B-M3

2018 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 2018 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,

Elizabeth Gibert

Regulatory Coordinator/Jacobs

I certify that the information contained in or accompanying the portion of the 2018 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.

4	dann	mh	the	

CC:

Document Control



DATE:

January 30, 2019

TO:

Ms. Cheryl Berry, DES

FROM:

Ms. Elizabeth Gibert, Jacobs

SUBJECT:

City of Baton Rouge and Parish of East Baton Rouge

Consent Decree-Civil Action No. 01-978-B-M3

2018 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 2018 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,

Elizabeth Gibert

Regulatory Coordinator/Jacobs

I certify that the information contained in or accompanying the portion of the 2018 Annual EPA Report that I am responsible for is true, accurate, and complete. As to those identified portions of this document for which I cannot personally verify their truth and accuracy, I certify as the official having supervisory responsibility for the persons who, acting under my direct instructions, made the verification, that this is true, accurate and complete.

cc: Document Control

BATON ROUGE SSO PROGRAM 2002 CONSENT DECREE

2018 ANNUAL REPORT

January 30, 2019

Contents

Section		Page
Contents		i
Baton Rouge	Consent Decree 2018 Annual Report	1
1.1	Remedial Measures Action Plan	1
	1.1.1 RMAP1 Summary	1
	1.1.2 RMAP2 Summary	4
	1.1.2.1 Category 1: Comprehensive Sewer Basin Rehabilitation	7
	1.1.2.2 Category 2: Pump Station and Transmission Improvements	8
	1.1.2.3 Category 3: Wastewater Treatment and Storage	12
	1.1.3 Additional Projects Outside of Consent Decree	13
	1.1.4 Infiltration and Inflow Reduction Activities Summary	14
1.2	Treatment Facility Assessment	15
1.3	Environmental Results Monitoring	
1.4	Interim Relief Measures Activities	16
	1.4.1 North WWTP	16
	1.4.2 Central WWTP	16
	1.4.3 South WWTP	16
1.5	Outreach and Public Awareness Program	17
1.6	Plan Modification Needs	
1.7	Stipulated Penalties	17

Tables

1	FDA Consent Decree BNAAD 1 Milestones
1	EPA Consent Decree RMAP 1 Milestones

- 2 EPA Consent Decree RMAP 2 Milestones for Category 1 Projects
- 3 EPA Consent Decree RMAP 2 Milestones for Category 2 Projects
- 4 EPA Consent Decree RMAP 2 Milestones for Category 3 Projects
- 5 Proposed Schedule for Projects Outside of Consent Decree
- 6 I/I Reduction Activities Summary
- 7a Monthly Average Percent Removal for North Plant- LA0036439
- 7b Monthly Average Percent Removal for South Plant- LA0036412
- 8 Penalties Assessed and Paid by the City/Parish to Date
- 9 Self-Reported Potential Stipulated Penalties (SSOs and WWTP Violations)

Attachments

- A Notice and Updates of 2018 Force Majeure Events
- B Municipal Water Pollution Prevention Environmental Audit Reports



Baton Rouge Consent Decree 2018 Annual Report

This Annual Report for the period from January 1, 2018 to December 31, 2018 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, 2018, there have been 88 Consent Decree reporting deliverables submitted on or ahead of schedule.

As you can see, the City/Parish is actively moving forward with the execution of the RMAP2 projects included herein, as outlined in 2002 Consent Decree as well as 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). In addition, the City/Parish is now 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 4-year 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).

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 CH2M HILL was later contracted to serve as the Program Manager and charged to perform a more thorough and detailed engineering and evaluation of the revised approach. CH2M HILL is currently the City/Parish's consultant/Program Manager for the Sanitary Sewer Overflow (SSO) Control and Wastewater Facilities Program which was initiated to meet the goals of the Consent Decree.

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

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

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	•	·	,
N-05 PS 24 Area Upgrades N-06 PS 43 Area Upgrades	*PS 24/43 Area Upgrade (01-RMP-N05)	•		
N-09 PS 44/46 Area Upgrades	PS 44/46 Area Upgrades (01-RMP-N09)	•		
N-10 PS 240 Area Upgrades	PS 240 Area Upgrades (01-RMP-N10)	•		
	NTSN SS Eval. Study (99- RMP-N-99)	•		
	**Bellingrath Rehab. (03-RMP-N14) (NSRP)	•		
***N-99 North Further	**Frenchtown Road Sewer Rehab. (03-RMP- N15)	•		
Investigations	**North Area Comprehensive Rehab. (03-RMP-N23)	•		
	**PS 45 Area Rehab. (00-RMP-N31)	•		
C-03 PS 2 Area Rehabilitation	PS 2 Area Upgrades (01-RMP-C03)	•		
S-01B SWWTP Influent PS	SSO SWWTP Infl. PS Upgrade (99-RMP-SO1B)	•		
S-11 PS 40 Area Rehabilitation	S-11 PS 40 Area Rehabilitation	•		
	SSO Engr-South (99- RMP-S99)	•		
***S-99 South Further	PS 944 Area Upgrade Grv Sewer (99-RMP-S99)	•		
Investigations	PS 944 Area Upgrade (99-RMP-S99)	•		
	PS 177 Area Upgrade (99-RMP-S99)	•		
	**PS 211 Area Upgrades (99-RMP-S11)	•		
N-01 Choctaw Basin Return System	Choctaw Area Storage (04-RMP-N22)			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage.
N-13 North Choctaw Basin System	S-05 PS 58B Area Upgrades MWH RMAP2			RMAP1 project suspended. Project is included as RMAP2: Choctaw Storage PS.
N-04 PS 47 Area Upgrades	N-04 PS 47 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-07 PS 39/55 Area Upgrades	N-07 PS 39/55 Area Upgrades			RMAP1 project suspended. Project is included as RMAP2: Group Project 1B – Veterans Memorial Parkway PS FM.
N-11 PS 65 Area Upgrades	PS 65 and 65A Area Upgrades (01-RMP-N11)			Project suspended. Evaluated for inclusion in RMAP2 and Master Plan. Project proposed as a part of the Master Plan.

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			
N-02 PS 49/52 Area Upgrades	PS 49/52 Area Upgrade (01-RMP-N02)		4 th Quarter 2008	Project completed – 4th quarter 2008 (at 80% complete with construction). Project was in dispute with construction contractor. Both parties reached an agreement on terms and job was closed at 80% complete.
N-12 North Sewer Rehab Projects	North Sewer Rehab Projects (03-RMP-N12)		4 th Quarter 2007	Project completed – 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.
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

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 CH2M HILL to conduct a peer review to address issues about elements of the alternative plan including an assessment of costs and schedules and a reassessment of the South Wastewater Treatment Plant (WWTP) proposed work. Based on the peer review recommendations, a re-submittal, and the second request for approval, of the Revised RMAP2 modifications (including CDM's plan and CH2M HILL's updated plan for South WWTP compliance projects) was submitted by the City/Parish in conjunction with CH2M HILL on December 12, 2006.

^{**} 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

CH2M HILL was also selected as the new Program Manager, or City/Parish consultant, for this work during this timeframe. Per EPA and LDEQ request, a more descriptive follow-up report entitled *Addressing Existing Noncompliance Issues and Future Wet-Weather Flow Management Requirements for the South Wastewater Treatment Plant – Summary of Findings and Recommendations* was submitted in January 2007 that specifically addressed work at the South WWTP. This report detailed the recommendations outlined in the previous Revised Second RMAP submittal in December 2006. On July 10, 2007, the EPA and LDEQ sent a formal letter of approval to the City/Parish endorsing the December 2006 Revised Second RMAP proposal.

Since that time, a huge planning and engineering effort was undertaken by the City/Parish and the new Program Manager, CH2M HILL, and others in order to develop and implement a detailed RMAP2 submittal based on three (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 CH2M HILL have continually refined and performed quality control reviews of the hydraulic model of the sewer system, incorporating new information as it becomes available. These refinements at times have technically altered some aspects of the RMAP2 projects. However, the City/Parish regularly documents 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 CH2M HILL developed a technical memorandum titled *Response to Public Comments of the Agreement and Order Regarding the Modification of the Consent Decree - Civil Action No. 01-978-B-M3 (M.D. La.)* which included the City/Parish's response to the two public comments received by the DOJ on December 17, 2008 from Mr. Steve Irving and Ms. Kathryn Lewis. The memorandum was initially submitted on January 23, 2009, was later updated based on comments received by DOJ, and was 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 completed 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 4-year 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.

The City/Parish continues documenting the impact of force majeure events that have affected the Baton Rouge Area. During 2018, the City/Parish experienced Tropical Storm Gordon.

This event and other 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 is very demanding, and the time lost recently and in the past years from these force majeure events has 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. The City/Parish will continue to document all force majeure events that could impact the timely completion of Consent Decree elements.

Periodically, the City/Parish and CH2M HILL 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	1st QTR 2013	2 nd QTR 2015	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Jefferson Hwy – HooShooToo Road	•			Project completed – 3 rd quarter 2009.
Staring Lane – Boone Drive Area Rehabilitation Project	•			Project completed – 2 nd quarter 2010.
Burbank Drive – Gardere Lane Area Rehabilitation Project	•			Project completed – 1 st quarter 2011.
Oak Villa –Choctaw Street Area Rehabilitation Project	•			Project completed – 3 rd quarter 2011.
Scotland Avenue – Progress Road Area Rehabilitation Project	•			Project completed – 2 nd quarter 2011.
Elm Grove Garden Road – Harding Boulevard Area Rehabilitation Project	•			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	•			Project completed – 3 rd quarter 2012.
Silverleaf Road – Ford Street Area Rehabilitation Project	•			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	•			Project completed – 4 th quarter 2012.
Bluebonnet Blvd – Jefferson Hwy Phase I Area Rehabilitation Project		•		Project completed – 4 th quarter 2012.

Table 2. EPA Consent Decree RMAP 2 Milestones for Category 1 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*	-
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 201
Acadian Thruway – Claycut Road Area Rehabilitation Project		•		Project completed – 1 st quarter 2013
Acadian Thruway – Perkins Road Area Rehabilitation Project	•			Project completed – 4 th quarter 2012
Antioch Road – Chadsford Drive Area Rehabilitation Project		•		Project completed – 2 nd quarter 201
ones Creek Road – Tiger Bend Road Area Rehabilitation Project			•	Project completed – 1 st quarter 2016
Scenic Highway – Spanish Town Road Phase I Area Rehabilitation Project		•		Project completed – 2 nd quarter 201
Scenic Highway – Spanish Town Road Phase II Area Rehabilitation Project			•	Project completed – 2 nd quarter 2010
Siegen Lane – Interstate 10 Area Rehabilitation Project			•	Project completed – 2 nd quarter 2017
nterstate 110 – Hollywood Street Area Rehabilitation Project			•	Project completed – 3 rd quarter 2015
Ardenwood Drive – Winbourne Street Area Rehabilitation Project			•	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			•	Project completed – 3 rd quarter 2017
North 38 th Street – Gus Young Avenue Area Rehabilitation Project			•	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, 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*	
	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	•			Project completed - 2 nd quarter 2010.
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)		•		Project completed - 2 nd quarter 2013.

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*	
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		•		Project completed - 2 nd quarter 2013.
Group Project 2 (Old Perkins – Highland Road Area Upgrades)	•			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.
Nicholson Drive – Highland Road – Perkins Road Capacity Improvements Phase B		•		Project completed - 1 st quarter 2015.
Bayou Duplantier Area Sewer Upgrades		•		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			•	Project completed - 1 st quarter 2016.
Plank Road – Kleinpeter Road Sewer Area Upgrades		•		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)	•			Project completed - 2 nd quarter 2010.
Staring Lane FM (Phase II - Highland road to Perkins Road)		•		Project completed - 4 th quarter 2013.
Staring Lane FM (Phase III - Perkins to PS58)		•		Project completed - 3 rd quarter 2014.
Multiple PS - Jefferson Hwy - Park Forest Dr		•		Project completed - 3 rd 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	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	-
Airline Highway Pipeline Improvements- Phase A			•	Project completed - 3 rd quarter 2017.
Airline Highway Pipeline Improvements- Phase B			•	Project completed – 3 rd quarter 2018.
Multiple PS - Highland Road - Kenilworth Parkway			•	Project completed – 2 nd quarter 2017.
Florida Boulevard Pump Station Improvements			•	Project completed – 4 th quarter 2018.
Plank Road Pump Station Improvements			•	Project completed – 1 st quarter 2017.
Multiple PS - Highway 61 - Plank Road			•	Project completed – 2 nd quarter 2018.
O'Neal Lane Pump Station Improvements – Group A			•	Project completed – 2 nd quarter 2017.
O'Neal Lane Pump Station Improvements – Group B			•	Project completed – 4 th quarter 2017.
Sherwood Forest Blvd – Goodwood Blvd Pipeline Improvements			•	Project completed – 1 st quarter 2018.
Joor Road - Greenwell Springs Road Sewer Area Upgrades			•	Project completed – 3 rd quarter 2018.
Plank Road - Port Hudson Pride Road Sewer Area Upgrades			•	Project completed - 3 rd quarter 2015.
Highland Road Pipeline Improvements - Group A			•	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			•	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 - 1st quarter 2016.
Pump Station 42 Forcemain - Phase I		•		Project complete - 3 rd quarter 2014.

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*	-
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.

^{*}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.

1.1.2.3 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 64 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 200 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.

- South Choctaw Storage Facility
- North Hooper Storage Facility

These storage projects are part of the transmission system that allows for retaining (storage) of peak wet weather flows and permits that stored flow is later released for treatment at the treatment plant. All projects of this type are completed. The details of the wastewater treatment and storage projects are listed in Table 4 below and are current through December 31, 2018.

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	4 th QTR 2018	Project Status Summaries
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Choctaw Storage and Pump Station Facility		•		Project completed – 3 rd quarter 2013.
Hooper Storage Facility		•		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)		•		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.

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.

Table 5. Proposed Schedule for Projects Outside of Consent Decree

	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.

Table 5. Proposed Schedule for Projects Outside of Consent Decree

	Scheduled Start	Scheduled Finish	Project Status Summary
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
	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, South, and Central WWTP collection systems. The City/Parish spent approximately \$10.91 million, therefore this goal was exceeded during 2018. 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 2018 to meet this requirement.

Table 6. I/I Reduction Activities Summary

Project	Description	% Complete	Contract Amount	Expenditures 2018
15-MH-UF-0001	Manhole Rehabilitation Contract - Year 3	42%	\$1,500,000.00	\$637,489.25
18-MH-UF-0001	Manhole Rehabilitation Contract - Year 1	8%	\$1,500,000.00	\$115,805.00
15-PI-MS-0041	Sewer Physical Inspection Contract	99%	\$4,000,000.00	\$3,966,652.55
16-CP-MS-0010	Annual Cured-In-Place Lining - Year 1	51%	\$1,989,945.00	\$1,014,711.20
16-CP-MS-0010	Annual Cured-In-Place Lining - Year 2	29%	\$1,989,945.00	\$573,308.40
17-PN-MS-0016	Supplemental Parishwide Sewer Repair and Replacement Project - Year 1	25%	\$1,583,625.05	\$394,647.53
17-PN-MS-0016	Supplemental Parishwide Sewer Repair and Replacement Project - Year 2	31%	\$1,583,625.05	\$487,419.04
17-PN-MS-0015	Annual Parishwide Sewer Repair and Replacement Project - Year 1	51%	\$1,818,505.00	\$930,640.92
17-PN-MS-0015	Annual Parishwide Sewer Repair and Replacement Project - Year 2	26%	\$1,818,505.00	\$475,386.54
16-ER-WC-0008	Parishwide Sewer Emergency Repair - Year 2	59%	\$2,500,000.00	\$1,463,170.88
16-ER-WC-0008	Parishwide Sewer Emergency Repair - Year 3	34%	\$2,500,000.00	\$855,298.18
		TOTAL	\$22,784,150.10	\$10,914,529.49

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, South, and Central 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, South and Central 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 June 25, 2018.

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. The Phase II Results Monitoring will begin 6 months following completion of all remedial measures within a specified drainage area contributing to an identified sampling location.

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.

1.4.1 North WWTP

During 2018, the North WWTP has been in compliance with the 75% interim effluent limits for BOD for 12 months and for TSS for 12 months of the reporting period. The North WWTP met the permit limit of 85% removal for TSS for 3 months and 1 month for BOD, as shown in Table 7a.

Table 7a.	Table 7a. 2018 Monthly Average Percent Removal for North Plant- LA0036439											
	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
BOD	82	82	81	84	84	84	85	82	84	83	78	75
TSS	84	77	81	82	83	80	87	83	81	91	84	87

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 2018, the South WWTP has been in compliance with the 75% interim effluent limits for 12 months of the reporting period for BOD and 12 months for TSS. The South WWTP met the permit limit of 85% removal for TSS for 9 months, and BOD for 12 months, as shown in Table 7b.

Table 7b.	Table 7b. 2018 Monthly Average Percent Removal for South Plant- LA0036412											
Jan. Feb. Mar. Apr. May June July Aug. Sept. Oct. Nov. Dec.										Dec.		
BOD	87	85	88	89	92	89	91	95	94	93	88	85
TSS	81	80	88	91	92	85	91	92	94	90	86	84

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://www.brprojects.com/SSOProgram/Default.aspx 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 2018 are presented in Tables 8 and 9.

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

Penalties	Assessed	Paid					
Penalties	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 2018 (SSOs and WWTP violations)

Stipulated Penalties	Number	Cost Per Occurrence	Amount Accrued
Unauthorized Discharges 2018			
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	9	\$5,000	\$45,000
Non-Compliant Discharges (WWTP) 2018			
Weekly Average Limits	10	\$1,000	\$10,000
Monthly (30-day average) Limits	13	\$2,500	\$32,500
Daily Limits	2	\$1,000	\$2,000
2018 Total Stipulated Penalties (through December 31, 2018)			\$89,500

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.

2018 Annual Report Attachment A-2018 Force Majeure Events and Updates



CERTIFIED- RETURN RECEIPT REQUESTED

DATE:

September 4, 2018

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 – Tropical Storm Gordon

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 September 3, 2018 in the form of Tropical Storm Gordon.

A Tropical Storm Warning is in effect in Louisiana and includes threats of strong gusty winds, coastal flooding and heavy rainfall, with the primary impacts occurring from September 4, 2018 through September 5, 2018. 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 134 JBE 2018, State of Emergency – Tropical Storm Gordon) as a result of Tropical Storm Gordon, the effects of which continue to threaten the lives and property of the Citizens of the State. The Governor's order is effective September 3, 2018 until October 3, 2018.

All active construction SSO Program projects have been impacted by this event.

The SSO Program will aggressively pursue resumption of construction when it is deemed appropriate to do so and will provide an update upon completion of the Force Majeure event.

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

Marsha Hanlon, Interim Finance Director

Samuel Coleman, PE, Acting Regional Administrator (Region 6)

Adam Smith, PE, DES Chief of Wastewater Engineering & Technology

Carlos Zequeira Brinsfield, US EPA (6RC)

Darlene Whitten-Hill US EPA (6EN)

Ted Broyles, LDEQ

Joseph Young, PE, Program Manager, CH2M

ATTACHMENT A: PROCLAMATION NUMBER 134 JBE 2018, STATE OF EMERGENCY - TROPICAL STORM GORDON



EXECUTIVE DEPARTMENT

PROCLAMATION NUMBER 134 JBE 2018

STATE OF EMERGENCY – TROPICAL STORM GORDON

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)(1) empowers the Governor to declare a state of emergency by executive order or

proclamation, or both;

WHEREAS, a Tropical Storm Warning is in effect along the Louisiana coast in response

to Tropical Storm Gordon; and

WHEREAS, threats will include strong gusty winds, coastal flooding and heavy rainfall,

with the main impacts occurring from Tuesday afternoon through

Wednesday.

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 as a result of Tropical Storm Gordon, the effects of which continue to 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 is hereby authorized to undertake any activity authorized by law which he deems appropriate in response to this

declaration.

SECTION 3: 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.

SECTION 4:

This order is effective upon signature and shall remain in effect from Monday, September 3, 2018 until Wednesday, October 3, 2018, unless terminated sooner.



IN WITNESS WHEREOF, I have set my hand officially and caused to be affixed the Great Seal of Louisiana, at the GOHSEP, in the City of Baton Rouge, on this 3rd day of September, 2018.

OVERNOR OF LOUISIANA

ATTEST BY THE SECRETARY OF STATE

SECRETARY OF STATE

2018 Annual Report Attachment B-Municipal Water Pollution Prevention Environmental Audit Reports

LOUISIANA

MUNICIPAL WATER POLLUTION PREVENTION

MWPP



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 Avenue

Baton Rouge, LA

Parish:

East Baton Rouge

(Person Completing Form) Name:

Cynthia Thomas

Title:

Asst. Wastewater Laboratory Supervisor

Date Completed:

June 25, 2018

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.
 - b. 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.

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)
16.78	x	157	x 8.34 =	21,971
21.67	x	123	x 8.34 =	22,230
25.37	x	121	x 8.34 =	25,602
18.30	x	123	x 8.34 =	18,772
21.30	x	122	x 8.34 =	21,672
11.57	x	181	x 8.34 =	17,465
11.83	x	164	x 8.34 =	16,181
10.41	x	188	x 8.34 =	16,322
22.89	x	140	x 8.34 =	26,726
23.93	x	177	x 8.34 =	35,325
21.29	x	174	x 8.34 =	30,895
18.51	x	183	x 8.34 =	28,250

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

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

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

LA0036439

C.	(WW	many m TF) exc total. V	eed 90)% of (design	flow?	Circle	the nu	ımber o	of mon				
	months	0	1	2	3	4	5	6	7	8	9	10	11	12
	points	(0)	0	0	0	0	5	5	7 5	5	5	5	5	5
						Write	e 0 or 5	in the	C poi	nt total	box	0	C Poi	nt Total
D.	Circle	many me the number at the	mber c	did the	month ths and	oly flo	w (Col spondi	umn 1 ng poi) to the	WWT Write	F exc e the p	eed the point to	desigr tal in t	n flow? he box
	months	(0)	1	2	3	4	5	6	7 15	8	9	10	11	12
	points	0	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.	of the	many m design int tota	loadin	g? Cir	rcle the	numb	er of n	ling (C nonths	olumn and co	3) to the rrespo	he W\ nding	WTF ex point to	cceed 9 otal. V	0% Vrite
	months	0	1	2	3	4	5	6	7	8	9	10	11	12
	points	6	0	5	5	5	10	10	7 10	10	10	10	10	10
					Wı	ite 0,	5,or 10	in the	E poin	it total	box	0	E Poir	nt Total
F.	design	nany m loadin total in	g? Cir	cle the	numb	er of n	nonths							
	months	0	1	2	3	4	5	6	7 50	8	9	10	11	12
	months points	(o)	10	20	30	40	50	50	50	50	50	50	50	50
			W	rite 0,	10, 20,	, 30, 4	0 or 50	in the	F poin	t total	box	0	F Poin	t Total
G.	Add to	gether	each p	oint to	tal for	C thro	ugh F	and pla	ace this	sum i	n the l	box bel	ow at t	he right.
					TOTA	AL PO	INT V	ALU	E FOR	PAR	Г 1:	0	(max	= 80)
	12.44				00			HERE HENE	41	1		- +-1-1-		~~ 1 <i>6</i>

PART 2. EFFLUENT QUALITY / PLANT PERFORMANCE

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

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
APRIL	21	18
MAY	20	22
JUNE	19	19
JULY	20	18
AUGUST	22	16
SEPTEMBER	23	17
OCTOBER	25	16
NOVEMBER	27	18
DECEMBER	29	20
JANUARY	31	22
FEBRUARY	31	28
MARCH	35	26

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

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

C. Continuous Discharge to Surface Water.

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

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

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

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

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

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

months 0 1 2 3 4 5 6 7 8 9 10 11 12 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 0 iii Point Total

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

12 9 10 11 8 3 5 6 7 months 10 10 10 10 10 10 10 10 10 10 5 5 points

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

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

TOTAL POINT VALUE FOR PART 2: 40 (max = 100)

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

LA0036439

D.	Other	Monitoring	and	Limitations
----	-------	------------	-----	-------------

Check one box.	Yes	✓ No	If Yes, Please describe:
			
t any time in the past oxicity) test of the eff	year was there a luent?	a "failure" of a l	Biomonitoring (Whole Effluent
Check one box.	Yes	V No	If Yes, Please describe:
	year was there	an exceedance o	of a permit limit for a toxic
t any time in the past pubstance?		☐ No	If Yes, Please describe:
t any time in the past jubstance? Check one box.	Yes		
ibstance?			

NWWTP - LA0036439 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
04/24-25/2017	Total Phenols	0.005 mg/L	0.024 mg/L
	Zinc	20 μg/L	42 μg/L

^{*1/6} months

NWWTP - LA0036439 **(Effluent)***

Sample Date	Pollutant	Reporting Value	Actual Value
04/25-26/2017	Zinc	20 μg/L	24 μg/L
	Mercury	0.50 ng/L	3.3 ng/L
	Copper	3 μg/L	6 μg/L
	Selenium	5 μg/L	24 μg/L
	Phenanthrene	0.20 μg/L	0.23 μg/L
	Aldrin	0.0020 μg/L	0.0034 μg/L
	Gamma-BHC (Lindane)	0.05 μg/L	0.0066 μg/L
	Heptachlor	0.0020 μg/L	0.0070 μg/L

^{*1/6} months

Attachment Page 1

NWWTP - LA0036439 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
10/11-12/2017	Total Phenols	0.005 mg/L	0.14 mg/L
10/11 12/2011	Zinc	20 μg/L	106 μg/L

NWWTP - LA0036439 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
01/09-10/2018	Copper	3 μg/L	8 μg/L
01/07-10/2010	Lead	2 μg/L	9 μg/L
	Zinc	20 μg/L	38 μg/L
	Mercury	0.50 ng/L	4.7 ng/L
	Naphthalene	0.20 μg/L	0.31µg/L
	Phenanthrene	0.20 μg/L	0.29 μg/L
	Alpha-BHC	0.0020 µg/L	0.049 μg/L
	Dieldrin	0.0020 μg/L	0.0074 μg/L
	Pentachlorophenol	0.050 μg/L	0.13 μg/L

^{*1/6} months

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

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

Enter Age in Part C below.

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

_<	Mechanical Treatment Plant trickling filter, activated sludge, etc)	2.5
	Specify Type: Aerated Lagoon	2.0
	Stabilization Pond	1.5
8	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.

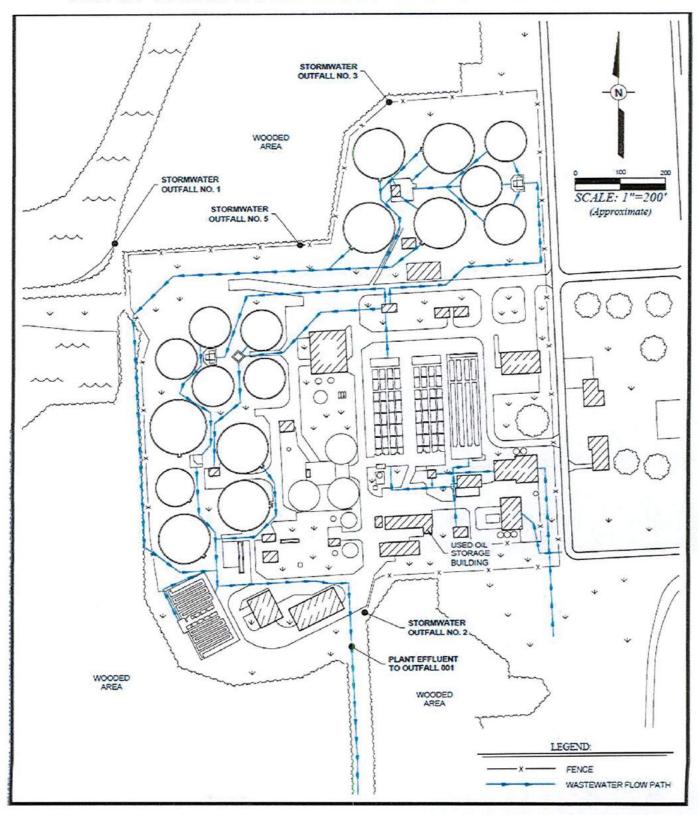
TOTAL POINT VALUE FOR PART 3 =

$$\frac{2.5}{Factor} \times \frac{20}{Age} = 50 \text{ (max = 50)}$$

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

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

Figure 2-2
North Wastewater Treatment Plant Plot Plan



LA0036439

PART 4: OVERFLOWS AND BYPASSES

A. i.	List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to heavy rain:
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: 40 Treatment Plant: 4
B. i.	List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system:
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: 251 Treatment Plant: 8
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.
	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.

LA0036439

PART 5: SEWAGE SLUDGE STORAGE, USE, AND DISPOSAL

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 points

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

A Point Total 50

For how many months does your facility have approval to use or dispose of sewage sludge B. 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 points 50

C.

6-11

12-23

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

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

TOTAL POINT VALUE FOR PART 5:

(max = 100)

B Point Total

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

Permit #: LA0036439

	the last year.		al of all sewer line extensions whi
Design Population:	0		
Design Flow:	0.0	MGE)
Design BOD:	200	mg/l	
Has an industry (or of in the past year, such significantly increased	that either flow o	r pollutant lo	the community or expanded produ adings to the sewerage system we
√ Check one box.	Yes =	15 points	No = 0 points
If Yes, Please describe	e:		
List any new pollutant	ts:		
Is there any developm	ent (industrial, co	ommercial or	residential) anticipated in the nex s to the sewerage system could
Is there any developm	ent (industrial, co	ommercial or stant loading	residential) anticipated in the nex s to the sewerage system could
Is there any developm 2-3 years, such that ei	ent (industrial, co	ommercial or stant loading	residential) anticipated in the next to the sewerage system could No = 0 points
Is there any developm 2-3 years, such that ei significantly increase?	ent (industrial, co ther flow or pollu Yes =	tant loading	s to the sewerage system could

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

TOTAL POINT VALUE FOR PART 6: 0

(max = 30)

LA0036439

PART 7: OPERATOR CERTIFICATION AND EDUCATION

A.	What was the name of the operator-in-charge for the reporting year?
	Name: Calvin Hayes
B.	What is his or her certification number: Cert.#: 7130
C.	What level of certification is the operator-in-charge required to have to operate the wastewater treatment facility? Level Required: Wastewater Treatment IV
D.	What is the level of certification of the operator-in-charge?
Σ.	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 \square 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?
	√ Check one box.
G.	How many hours of continuing education has the operator-in-charge completed over the last two calendar years?
	$\sqrt{\text{Check one box.}}$ > 12 hours = 0 points $$ < 12 hours = 50 points
	Write 0 or 50 in the G point total box 0 G Point Total
н.	Is there a written policy regarding continuing education an training for wastewater treatment plant employees?
	√ Check one box.
	Explain: 16 hours of continuing education within a two year period
I.	What percentage of the continuing education expenses of the operator-in-charge were paid for:
	By the permittee? 100% By the operator? 0%
J.	Add together the E and G point values and place the sum in the box below at the right.
	TOTAL POINT VALUE FOR PART 7: 0 (max = 100)
	Also enter this value or 100, whichever is less, on the point calculation table on page 16.

LA0036439

√ Che	eck one box.	Yes	X No	If No, How are O&M costs finan
The a on	City-Parish has e-half of one pe	two sources ercent sales a	of revenue	for sewer, the sewer user fee, a dedicated to sewer. 65% of the 35% from the sewer sales tax.
			available to	

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 the next 5 years?	e under construction fo	or
	See Attachment		
В.	If you have ponds please answer the following questions:	√ Check one box.	
i. ii.	Do you have duckweed buildup in the ponds? Do you mow the dikes regularly (at least monthly), to the waters edge?		No No
iii.	Do you have bushes or trees growing on the dikes or in the ponds?	☐ Yes ☐ ☐	No
iv.	Do you have excess sludge buildup (> Ifoot) on the bottom of any of your ponds?	☐ Yes ☐]	No
	Day of your points.	T Yes T	No
v.	Do you exercise all of your valves?	H H	No
vi.	Are your control manholes in good structural shape?	L res	NO
vii.	Do you maintain at least 3 feet of freeboard in all of your	□ v □ 1	Ma
	ponds?		No
viii.	Do you visit your pond system at least weekly?	Yes	No

LA0036439 NORTH WASTEWATER PLANT BASIN MONITORING PERIOD - APRIL 1, 2017 THRU MARCH 31, 2018 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 and remove and replace for existing pipelines. A summary of the activities is included in the table below.

Gravity Collection System	Q2 2017	Q3 2017	Q4 2017	Q1 2018	Total
Lines Cleaned (ft)	49,783	70179	24,099	56,503	200,564
CCTV Inspected (ft)	51,034	70,179	24,099	57,904	203,216
Smoke Tested (ft)	0	70,792	0	0	70,792
Smoke Tested (no. of locations)	0	0	0	0	0
Dye Water Flooded (no. of locations)	0	0	0	0	0
Manholes Inspected (no.)	135	70	0	220	425
Lines Repaired (no.)	20	52	72	92	236
Manholes Rehabilitated (no.)	24	0	15	36	75
Force Mains					
Visual Surface Inspection (Miles)	37.2	43.2	35	37.2	152.6
Repaired (no.)	0	0	0	6	6
Air Release Valves					
Inspected / Maintained	186	216	175	186	763
Repaired (no.)	69	94	67	88	318

A2. The City-Parish maintains a routine pump station preventative maintenance and reactive maintenance program. The pump station staff is 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	Q2 2017	Q3 2017	Q4 2017	Q1 2018	Total
Inspections (no.)	6,617	6,630	6,279	6,669	26,195
Wet Wells Cleaned	113	69	91	108	381
Repaired (no.)	10	13	12	12	47

A3. The City-Parish is completing a \$1.25 billion capital improvements program to improve conveyance, pumping, and treatment capacities and rehabilitate existing system assets. The projects under this program will be completed by December 2018.

As the major CIP is coming to a close, 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 to rehabilitate or replace approximately 10 pump stations and completion of the lining of critical large diameter gravity pipeline 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.

LA0036439

Treatment Plants		
Have the influent and effluent flo	w meters been calibrated i	n the last year?
✓ Yes No (√ Che	eck one box.)	
*See Below		*See Below
Influent flow meter calibration de	ate(s) Effluer	t flow meter calibration date(s
What problems, if any, have been treatment?	n experienced over the last	year that have threatened
		7
Is your community presently invo	olved in formal planning fo	r treatment facility upgrade?
√ Check one box.	Yes No	f Yes, Please describe:
There are currently (5) construction	n projects ongoing to make i	mprovements to pretreatment,
odor control, electrical, SCADA as		
	de ponde manage	
	ad Johns Manage	
*Gravity Influent	*Forcemain Influent	*Final Effluent
*Gravity Influent 9-5-2017		*Final Effluent 5-15-2017
	*Forcemain Influent	

LA0036439

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 new computer program will manage 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? X Yes No						
iii.	Are these preventive maintenance tasks, as well as equipment problems, being recorded and filed so future maintenance problems can be assured properly?						
	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? √ 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?						
	√ 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	40	100 points
Part 3: Age of WWTF	50	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:	240	

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

	City Parish	(governing body).
	011, 1 1111	
	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 Disc	harge Elimination System (LPDES) permit,
	number LA 0036439 AI # 484	
	(Please be specific in listing th	e 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.
	t on Navara	dergoing performance maintenance improvements.
	b. The NWWTP is currently us	dergoing performance manifemance improvements.
	C.	
	d.	
	etc	
		1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
ass	ed by a majority/unanimous (circ	leone) vote of the EBR Metropolitan Cancil
n	Oct 10, 2018	late).
	1	// 1/ 1/ //
		Denvoct seil
		- Us agripus
		11 Ashly Beek
		CLERK
		Cunch Ideain Two
		Ad hall hi lives

Introduction 9 abls

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

ADOPTED METROPOLITAN COUNCIL

OCT 1 0 2018

OCT 1 0 2018

COUNCIL ADMINISTRATOR TREASURER

COUNCIL ADMINISTRATOR TREASURER

18-01148

RESOLUTION 53872

EBROSCO RESOLUTION 8335

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 APRIL 1, 2017 THROUGH MARCH 31, 2018.

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 North Treatment Plant (LA0036439 AI#4843) to the Louisiana Department of Environmental Quality (LDEQ) for the monitoring period of April 1, 2017 through March 31, 2018.

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

CERTIFIED A TRUE COPY

JAN 0 7 2019

COUNCILADMINISTRATIOR

LOUISIANA

MUNICIPAL WATER POLLUTION PREVENTION

MWPP



Facility Name:

City of Baton Rouge / Parish of East Baton Rouge / South Wastewater Treatment Plant

LPDES Permit Number:

LA0036412

Agency Interest (AI) Number:

4841

Address:

2850 Gardere Lane

Baton Rouge, LA

Parish:

East Baton Rouge

(Person Completing Form) Name:

Cynthia Thomas

Title: Asst. Wastewater Laboratory Supervisor

Date Completed:

June 25, 2018

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.
 - b. 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.

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)
52.04	x	126	x 8.34 =	54,686
47.45	x	135	x 8.34 =	53,424
55.19	x	126	x 8.34 =	57,996
62.81	x	118	x 8.34 =	61,812
47.10	x	117	x 8.34 =	45,959
56.78	x	112	x 8.34 =	53,037
41.59	x	131	x 8.34 =	45,439
39.82	x	145	x 8.34 =	48,154
41.34	x	175	x 8.34 =	60,336
53.23	x	129	x 8.34 =	57,268
62.06	x	134	x 8.34 =	69,356
58.66	x	115	x 8.34 =	56,261

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.	(WWI	F) exc	eed 90	0% of	design	flow?	Circle	umn 1) the numelow at	mber o	of mont	water t	reatme the co	ent faci orrespo	lity nding
	months	0	1	2	3	4	5	6	7	8	9	10	11	12
	points	0	0	0	3 0	0	5	(5)	5	8 5	5	5	5	5
						Write	e 0 or 5	in the	C poir	nt total	box	5	C Poir	nt Total
D.	How n Circle below	the nur	mber (did the	e month ths and	ly flo	w (Col spondi	umn 1) ng poin	to the	WWT Write	F exce the p	ed the	design tal in tl	flow? ne box
	months	0	1	2	(3)	4	5	6	7	8	9	10	11	12
	points	0	5	5	(10)	10	5 15	15	15	15	15	15	15	15
					Write	0, 5, 1	0 or 15	in the	D poi	nt total	box	10	D Poi	nt Total
E.	of the	design	loadir	ng? Ci	e month role the pelow a	numb	per of r	ding (Co nonths	olumn and co	3) to to	he WW nding	TF expoint to	cceed 9 otal. V	0% Vrite
	months	0	1	2	3	4	5	6	7	8	9	10	11	12
	points	(0)	0	5	3 5	5	10	10	10	10	10	10	10	10
					W	rite 0,	5,or 10) in the	E poi	nt total	box	0	E Poir	nt Total
F.	design	loadin	g? Ci	ircle th	e month e numb w at th	er of 1	nonths	ding (Co and co	olumn	3) to to	he WW point t	VTF exotal. V	ceed the Vrite the	ne ne
	months	0	1	2	3	4	5	6	7	8	9	10	11	12
	points	0	10	20	30	40	50	50	50	50	50	50	50	50
			V	Vrite 0	, 10, 20	, 30, 4	0 or 5	0 in the	F poi	nt total	box	0	F Poir	nt Total
G.	Add to	gether	each	point to	otal for	C thro	ough F	and pla	ace thi	s sum i	in the b	oox be	ow at	the righ

TOTAL POINT VALUE FOR PART 1: 15 (max = 80)

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

PART 2: EFFLUENT QUALITY / PLANT PERFORMANCE

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

Month	Column 1 Average Monthly BOD (mg/l)	Column 2 Average Monthly TSS (mg/l)
MARCH	26	20
APRIL	21	25
MAY	23	43
JUNE	13	23
JULY	12	18
AUGUST	14	39
SEPTEMBER	10	15
OCTOBER	10	15
NOVEMBER	10	12
DECEMBER	14	29
JANUARY	17	27
FEBRUARY	17	28

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

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

C.	Continuous	Discharge	to Surface	Water.
----	------------	-----------	------------	--------

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

12 9 10 11 2 3 5 6 40 40 40 40 40 40 40 40 10 20 30 points

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

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

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

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

months 0 1 2 3 (4) 5 6 7 8 9 10 11 12 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 30 iii Point Total

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

months 0 1 $\binom{2}{5}$ 3 4 5 6 7 8 9 10 11 12 points 0 5 $\binom{5}{5}$ 10 10 10 10 10 10 10 10 10 10

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

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

TOTAL POINT VALUE FOR PART 2: 35 (max = 100)

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

Permit #: LA0036412

Other Monitoring and Limitations

Check one box.	Yes	☐ No	If Yes, Please describe:
	- The State of the		
* See Attachment 1			
t any time in the past	vear was there	a "failure" of a	Biomonitoring (Whole Effluent
oxicity) test of the eff		a famule of a f	Diomonitoring (Whole Emacin
Check one box.	Yes	No	If Yes, Please describe:
- militar - St	W		
t any time in the past y	year was there a	in exceedance o	f a permit limit for a toxic
Check one box.	Yes	□ No	If Yes, Please describe:
* See Attachment 2 & 3			

D. Other Monitoring and Limitations i. p. 6

1.)	Fecal Coliform	03/13-19/2017	1,488 col./100 ML
2.)	Fecal Coliform	03/01-31/2017	404 col./100 ML
3.)	Fecal Coliform	03/31-04/03/2017	2,097 col./100 ML
4.)	Fecal Coliform	04/04-10/2017	794 col./100 ML
5.)	Fecal Coliform	05/02-08/2017	881 col./100 ML
6.)	Fecal Coliform	06/20-26/2017	1,584 col./100 ML
7.)	Fecal Coliform	06/01-30/2017	361 col./100 ML
8.)	Fecal Coliform	07/25-31/2017	1,136 col./100 ML
9.)	pH	11/02/2017	5.81 S.U.
10.)	Total Residual Chlorine	11/01-30/2017	0.58 MG/L
11.)	Total Residual Chlorine	12/01-31/2017	0.54 MG/L
12.)	Total Residual Chlorine	01/01-31/2018	0.64 MG/L
13.)	Fecal Coliform	02/20-26/2018	510 col./100 ML
14.)	Total Residual Chlorine	02/01-28/2018	0.51 MG/L

Attachment 1

SWWTP - LA0036412 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
04/24-25/2017	Total Phenols	0.005 mg/L	0.032 mg/L
	Zinc	20 μg/L	62 μg/L

^{*1/6} months

SWWTP - LA0036412 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
04/25-26/2017	Copper	3 μg/L	6 μg/L
BE MAKES OFFICE AT ALL	Mercury	0.50 ng/L	3.7 ng/L
	Dieldrin	0.0020 μg/L	0.0041 µg/L
	Phenols	0.0050 μg/L	0.0060 μg/L

^{*1/6} months

Attachment Page 2

SWWTP - LA0036412 (Influent)*

Sample Date	Pollutant	Reporting Value	Actual Value
12/11-12/2017	Total Phenols	0.005 mg/L	0.079 mg/L
SMAR.0040*	Copper	3 μg/L	4.0 μg/L
	Zinc	20 μg/L	27 μg/L

^{*1/6} months

SWWTP - LA0036421 (Effluent)*

Sample Date	Pollutant	Reporting Value	Actual Value
12/26-27/2017	Copper	3 μg/L	4 μg/L
	Mercury	0.50 ng/L	1.9 ng/L
	4,4-DDT	0.010 μg/L	0.014 μg/L
	2,4-DB	0.50 μg/L	0.89 μg/L

^{*1/6} months

Attachment Page 3

PART 3: AGE OF THE WASTEWATER TREATMENT FACILITY

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

 $\begin{array}{rcl}
 & 2015 \\
\hline
 & Current Year & - & Answer to A & = & Age in years \\
2018 & 2015 & 3 & 3
\end{array}$

Enter Age in Part C below.

 \mathbf{B} . \vee Check the type of treatment facility that is employed.

Mechanical Treatment Plant

trickling filter activated sludge, etc...)
Specify Type:

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.

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

Figure 2-2 South Wastewater Treatment Plant Plot Plan



LA0036412

OVERFLOWS AND BYPASSES 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: 3 = 15 points $\sqrt{\text{Check one box.}} \quad \boxed{\quad } 0 = 0 \text{ points}$ 1 = 5 points 4 = 30 points 2 = 10 points 5 or more = 50 points 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 Treatment Plant: Collection System: B. List the number of times in the last year there was an overflow, bypass or unpermitted discharge of untreated or incompletely treated wastewater due to equipment failure, either at the treatment plant or due to pumping problems in the collection system: 3 = 15 points 4 = 30 points5 or more = 50 points List the number of bypasses, overflows or unpermitted discharges shown in B (i) that ii. were within the collection system and the number at the treatment plant Collection System: 610 Treatment Plant: Specify whether the bypasses came from the city/village/town sewer system or from C. contract or tributary communities/sanitary districts, etc... Add the point values checked for A and B and place the total in the box below. D. (max = 100)TOTAL POINT VALUE FOR PART 4: 100 Also enter this value or 100, whichever is less, on the point calculation table on page 16. List the person responsible (name and title) for reporting overflows, bypasses or E. unpermitted discharges to State and Federal authorities: Michael Lowe, Wastewater Laboratory Supervisor

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

Describe the procedure for gathering, compiling and reporting:

LA0036412

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 (

.

3

4-5

6

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 points 50 6-11

12-23

24-35

(36) 0

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

0 B Point Total

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

TOTAL POINT VALUE FOR PART 5:

50

(max = 100)

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

Permit #: LA0036412

 $0 \quad (max = 30)$

	ere installed during the				
D	esign Population:	2,792 Cop			
D	Design Flow:	3.7	_MGD		
D	esign BOD:	200	mg/l		
ir	las an industry (or other the past year, such that ignificantly increased (t either flow or pol	ved into the lutant load	community of gs to the ser	or expanded produ werage system wer
V	Check one box.	Yes = 15 p	ooints	$N_0 = 0$	points
Τŧ	Yes, Please describe:				
	there any development -3 years, such that either gnificantly increase?	t (industrial, commer flow or pollutant	ercial or real	dential) anti he sewerage	cipated in the next system could
2-				No = 01	points
2- si	Check one box.	Yes = 15 p	oints	J 140 -01	
2- si √	•	Yes = 15 p	points	110 -0	

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

TOTAL POINT VALUE FOR PART 6:

LA0036412

RT 7: OPERATOR CERTIFICATION AND EDUCATION What was the name of the operator-in-charge for the reporting year? Name: Gregory Lewis B. What is his or her certification number: Cert.#: 11419 What level of certification is the operator-in-charge required to have to operate the C. wastewater treatment facility? Level Required: Wastewater Treatment IV What is the level of certification of the operator-in-charge? D. Level Certified: Wastewater Treatment IV Was the operator-in-charge of the report year certified at least at the grade level E. required in order to operate this plant? No = 50 points √ Check one box. X Yes = 0 points E Point Total Write 0 or 50 in the E point total box Has the operator-in-charge maintained recertification requirements during the reporting F. year? X Yes ☐ No √ Check one box. How many hours of continuing education has the operator-in-charge completed over the G. last two calendar years? |X| > 12 hours = 0 points< 12 hours = 50 points</p> √ Check one box. Write 0 or 50 in the G point total box G Point Total Is there a written policy regarding continuing education an training for wastewater H. treatment plant employees? √ Check one box. X Yes No 16 hours of continuing education within a two year period. Explain:

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

100%

I.

paid for:

By the permittee?

What percentage of the continuing education expenses of the operator-in-charge were

TOTAL POINT VALUE FOR PART 7: 0 (max = 100)

By the operator?

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

LA0036412

RT 8: FINANCIA	L STATUS		
Are User-Charge Reve	nues sufficient to	cover oper	ration and maintenance expenses?
$\sqrt{\text{Check one box.}}$	Yes	X No	If No, How are O&M costs finance
The City-Parish has a one-half of one pe	two sources of reent sales and	revenue f use tax de	Fricient to cover O&M expenses. For sewer, the sewer user fee, and edicated to sewer. 65% of the 35% from the sewer sales tax.
What financial resource and reconstruction need		vailable to p	pay for your wastewater improvement
	e of sewer reve	nue bonds	t's sewer construction needs and any funding that remains re met.

LA0036412

I

PA	RT 9: SUBJECTIVE EVALUATION	
A.	Collection System Maintenance	
i.	Describe what sewer system maintenance work has been done	in the last year.
	See attached	
ii.	Describe what lift station work has been done in the last year.	
	See attached	
iii.	What collection system improvements does the community has the next 5 years?	ve under construction for
	See attached	
В.	If you have ponds please answer the following questions:	√ Check one box.
i.	Do you have duckweed buildup in the ponds?	Yes No
ii.	Do you mow the dikes regularly (at least monthly), to the	
iii.	waters edge? Do you have bushes or trees growing on the dikes or in	Yes No
ш.	the ponds?	Yes No
iv.	Do you have excess sludge buildup (> 1foot) on the bottom	
	of any of your ponds? Do you exercise all of your valves?	Yes No
v. vi.	Are your control manholes in good structural shape?	H Yes H No
vii.	Do you maintain at least 3 feet of freeboard in all of your ponds?	Yes No
viii.	Do you visit your pond system at least weekly?	Yes No

LA0036412 SOUTH WASTEWATER PLANT BASIN MONITORING PERIOD - MARCH 1, 2017 THRU FEBRUARY 28, 2018 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 and remove and replace for existing pipelines. A summary of the activities is included in the table below.

Gravity Collection System	MAR. 2017	Q2 2017	Q3 2017	Q4 2017	JAN/FEB 2018	Total
Lines Cleaned (ft)	23,935	104,940	113,953	211,007	34,483	488,319
CCTV Inspected (ft)	23,306	113,289	120,373	211,960	66,959	535,887
Smoke Tested (ft)	9,094	32,409	119,856	3,266	2,632	167,257
Smoke Tested (no. of locations)	1	0	0	3	2	6
Dye Water Flooded (no. of locations)	0	0	0	0	0	0
Manholes Inspected (no.)	84	277	307	37	137	841
Lines Repaired (no.)	58	169	147	190	161	725
Manholes Rehabilitated (no.)	31	489	283	331	166	1,300
Force Mains						
Visual Surface Inspection (Miles)	9	15	18	20	13	74
Repaired (no.)	3	11	0	2	3	18
Air Release Valves						
Inspected / Maintained	44	74	91	99	63	371
Repaired (no.)	19	32	34	37	31	153

Note: March 2017 and January/February 2018 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 is 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	MAR. 2017	Q2 2017	Q3 2017	Q4 2017	JAN/FEB 2018	Total
Inspections (no.)	3,913	11,817	11,700	12,051	7,800	47,281
Wet Wells Cleaned	43	127	46	126	79	420
Repaired (no.)	4	13	11	13	5	46

Note: March 2017 and January/February 2018 data provided as a weighted average based on the quarterly data, as individual month data is not available.

A3. The City-Parish is completing a \$1.25 billion capital improvements program to improve conveyance, pumping, and treatment capacities and rehabilitate existing system assets. The projects under this program will be completed by December 2018.

As the major CIP is coming to a close, 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 to rehabilitate or replace approximately 10 pump stations and completion of the lining of critical large diameter gravity pipeline 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 effl	uent flow meters been calibrate	rated in the last year?
	Yes No	(√ Check one box.)	
	* See Below		* See Below
	Influent flow meter calibr	ation date(s)	Effluent flow meter calibration date(s)
ii.	What problems, if any, ha treatment?	we been experienced over th	e last year that have threatened
		d : - 1 - 1 : 6 1 - 1	in formation of failth and 2
iii.	√ Check one box.	Yes No	ing for treatment facility upgrade? If Yes, Please describe:
	* Gravity Influent	* Forcemain Efflu	ent * Final Effluent
	8-10-2017	8-10-2017	8-10-2017
	2-21-2018	2-21-2018	2-21-2018

LA0036412

Preventive Maintenance
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 new computer program will manage the preventive maintenance of plant equipment and spare parts.
Does this preventive maintenance program depict frequency of intervals, types of lubrication and other preventive maintenance tasks necessary for each piece of equipment? X Yes No
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
Sewer Use Ordinance
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?
$\sqrt{\text{Check one box.}}$ Yes \square 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.
Has it been necessary to enforce?
√ 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.
Any additional comments about your treatment plant or collection system? (Attach additional sheets if necessary.)
NO

LA0036412

POINT CALCULATION TABLE

	Actual Values	Maximum
Part 1: Influent Flow/Loadings	15	80 points
Part 2: Effluent Quality / Plant Performance	35	100 points
Part 3: Age of WWTF	7.5	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:	207.5	

ATTACHMENT 3

SAMPLE MWPP RESOLUTION

	Baton Rouge	
iana Department of Environmental Q	uality that the following	ng actions were taken by
City Parish	(gov	erning body).
Resolved the Municipal Water Pollu	tion Prevention Envir	onmental Audit Report which
is attached to this resolution.		
Set forth the following actions neces	sary to maintain pern	nit requirements contained
in the Louisiana Pollution Discharge	Elimination System	(LPDES) permit,
number LA 0036412 AI # 4841 .	*	
		0 1000 - 000
	ons that will be taken	to address the problems
identified in the audit report.)		
		e xxxxx xxxx xxxxx - fight great acceptant.
a. Currently, we are operating under a	consent decree which	became effective March 14, 2002.
b.		
c.		
d.		
etc		1
	CO ERI	2 Maturosity in Course
d by a majority/unanymous (circle one	vote of the	- Metro potracti cooriei
OCT 101 2013 (date).		$\Lambda \sim 1$
		1200 86-1
	/	12hVIN SU
		1 Ashley Beck
		CLERK JIII
		Council Solmin Tra
The sales are		
	Resolved the Municipal Water Pollu is attached to this resolution. Set forth the following actions neces in the Louisiana Pollution Discharge number LA 0036412 AI # 4841 . (Please be specific in listing the action identified in the audit report.) a. Currently, we are operating under a b. c. d. etc	Resolved the Municipal Water Pollution Prevention Envir is attached to this resolution. Set forth the following actions necessary to maintain perm in the Louisiana Pollution Discharge Elimination System number LA 0036412 AI # 4841 (Please be specific in listing the actions that will be taken identified in the audit report.) a. Currently, we are operating under a consent decree which b. c. d. etc d by a majority/unanymous (circle one) vote of the

ntroduction 9/36/18 ADOPTED

2H. |D|0 |8 EAST BATON ROUGE SEWAGE
COMMISSION

ADOPTED METROPOLITAN COUNCIL

OCT 10 2018

OCT 10 2018

18-01147

COUNCIL ADMINISTRATOR TREASURER

COUNCIL ADMINISTRATOR TREASURER

RESOLUTION 53871

EBROSCO RESOLUTION 8334

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 MARCH 1, 2017 THROUGH FEBRUARY 28, 2018.

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 March 1, 2017 through February 28, 2018.

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

CERTIFIED A TRUE COPY

JAN 0 7 2019

COUNCILADMINISTRATIOR