



BATON ROUGE SANITARY SEWER OVERFLOW PROGRAM
2002 CONSENT DECREE
2024 ANNUAL REPORT

January 31, 2025



CITY OF BATON ROUGE
PARISH OF EAST BATON ROUGE

Department of Environmental Services
222 Sait Louis Street
Suite 816
Baton Rouge, LA 70802





January 31, 2025

CERTIFIED – RETURN RECEIPT REQUESTED

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

Re: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3

Annual Report – **Period Ending December 31, 2024**

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, 2024. This report addresses the following items:

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

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

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

Sincerely,

Adam M. Smith, PE

Interim Environmental Services Director

Cc: Honorable Emile "Sid" Edwards, Mayor-President
Mr. Charlie Davis, Chief Administrative Officer
Mr. Gregory Rome, Parish Attorney
Mr. Fred Raiford, Interim Assistant Chief Administrative Officer
Mr. Tom Mariani, Chief, Environmental Enforcement Section, US DOJ
Ms. Aurelia S. Giacometto, LDEQ
Ms. Mona Tate, US EPA Region 6
Mr. Carlos Zequeira, (6RC-EA)
Ms. Darlene Whitten-Hill, (6EN-WC)
Mr. Rickey P. Brouillette
Mr. Darren P. Braud
Mr. Ted D. Stephens
Mr. Paul Nata



Date: January 31, 2025
To: Mr. Adam Smith, PE, Interim Director, Environmental Services
From: Ms. Lisa Purpera, Jacobs
Subject: City of Baton Rouge and Parish of East Baton Rouge
Consent Decree-Civil Action No. 01-978-B-M3
2024 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 2024 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,

Lisa Purpera

I certify that the information contained in or accompanying the portion of the 2024 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



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1. Baton Rouge Consent Decree 2024 Annual Report

This Annual Report for the period from January 1, 2024 to December 31, 2024 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 Consent Decree 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 Remedial Measures Action Plan (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, 2024, there have been 125 Consent Decree reporting deliverables submitted on or ahead of schedule.

1.1 Remedial Measures Action Plan

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

1.1.1 RMAP1 Summary

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



Program and, as such, some RMAP1 projects have been affected. Any, and all, such changes have been reported in previous reports.

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

In December 2007, the City/Parish and Jacobs submitted a detailed *RMAP1 Status Report* to the EPA that summarized the status of all of the RMAP1 projects. This report included a formal "Request for Time Extension" for those RMAP1 projects not yet completed, and a corresponding schedule for project completion. This report was submitted as the milestone requirement pursuant to Section XVIII – Reporting of the Consent Decree. This report and the request for a time extension were verbally approved by the U.S. Environmental Protection Agency (EPA) during a conference call on February 12, 2008. Since no formal approval was granted from the EPA or Louisiana Department of Environmental Quality (LDEQ) for the RMAP1 projects that were outstanding which were highlighted in the report, the City/Parish 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 RMAP1 projects are presented in Table 1. 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	Project Status Summary
		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
<i>Consent Decree Projects</i>	<i>Corresponding City/Parish Projects</i>			
N-05 PS 24 Area Upgrades	*PS 24/43 Area Upgrade (01-RMP-N05)	●		
N-06 PS 43 Area Upgrades				
N-09 PS 44/46 Area Upgrades	PS 44/46 Area Upgrades (01-RMP-N09)	●		
N-10 PS 240 Area Upgrades	PS 240 Area Upgrades (01-RMP-N10)	●		
***N-99 North Further Investigations	NTSN SS Eval. Study (99-RMP-N-99)	●		
	**Bellingrath Rehab. (03-RMP-N14) (NSRP)	●		
	**Frenchtown Road Sewer Rehab. (03-RMP-N15)	●		
	**North Area Comprehensive Rehab. (03-RMP-N23)	●		
	**PS 45 Area Rehab. (00-RMP-N31)	●		
C-03 PS 2 Area Rehabilitation	PS 2 Area Upgrades (01-RMP-C03)	●		



		RMAP1 Projects Completed	RMAP1 Projects Completed	Project Status Summary
Milestone Date		May 4, 2007	Proposed on September 1, 2008	
Construction Status		Complete	Complete	
<i>Consent Decree Projects</i>	<i>Corresponding City/Parish Projects</i>			
S-01B SWWTP Influent PS	SSO SWWTP Infl. PS Upgrade (99-RMP-SO1B)	●		
S-11 PS 40 Area Rehabilitation	S-11 PS 40 Area Rehabilitation	●		
***S-99 South Further Investigations	SSO Engr-South (99-RMP-S99)	●		
	PS 944 Area Upgrade Grv Sewer (99-RMP-S99)	●		
	PS 944 Area Upgrade (99-RMP-S99)	●		
	PS 177 Area Upgrade (99-RMP-S99)	●		
	**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.



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

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

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

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



1.1.2 RMAP2 Summary

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

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

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

Since that time, a huge planning and engineering effort was undertaken by the City/Parish and the new Program Manager, Jacobs, and others in order to develop and implement a detailed RMAP2 submittal based on three (3) types of projects: comprehensive sewer rehabilitation, pump station and transmission (capacity) improvements, and wastewater treatment/storage improvements. This planning and engineering effort consisted of refined modeling and calibration, detailed calculations, review of field data, and project development, prioritization,



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

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

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

Since its approval, the City/Parish has been actively moving forward with implementation of the projects included in the *Second Remedial Measures Action Plan (RMAP2) Submittal for the*



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

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

The City/Parish was able to successfully functionally complete all RMAP2 construction included herein, as outlined in the April 2009 Consent Decree Modification by DOJ, EPA, and LDEQ that adopts the corresponding *Second Remedial Measures Action Plan (RMAP2) Submittal for the Baton Rouge Sanitary Sewer Overflow Control and Wastewater Facilities Program* (September 2008). The City/Parish is adhering to the revised compliance schedule approved in the (June 2013) Revised Second Consent Decree Modification by DOJ, EPA, and LDEQ which formally approves the City/Parish’s 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.

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

The City/Parish and Jacobs re-evaluated 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.

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

Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Jefferson Hwy – HooShooToo Road	●			Project completed – 3rd quarter 2009.
Staring Lane – Boone Drive Area Rehabilitation Project	●			Project completed – 2nd quarter 2010.
Burbank Drive – Gardere Lane Area Rehabilitation Project	●			Project completed – 1st quarter 2011.
Oak Villa – Choctaw Street Area Rehabilitation Project	●			Project completed – 3rd quarter 2011.
Scotland Avenue – Progress Road Area Rehabilitation Project	●			Project completed – 2nd quarter 2011.



Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
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.
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.



Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Airline Highway – Goodwood Blvd Phase I Area Rehabilitation Project		●		Project completed-3 rd quarter 2014.
Airline Highway – Goodwood Blvd Phase II Area Rehabilitation Project		●		Project completed – 2 nd quarter 2015.
Acadian Thruway – Claycut Road Area Rehabilitation Project		●		Project completed – 1 st quarter 2013.
Acadian Thruway – Perkins Road Area Rehabilitation Project	●			Project completed – 4 th quarter 2012.
Antioch Road – Chadsford Drive Area Rehabilitation Project		●		Project completed – 2 nd quarter 2015.
Jones Creek Road – Tiger Bend Road Area Rehabilitation Project			●	Project completed – 1 st quarter 2016.
Scenic Highway – Spanish Town Road Phase I Area Rehabilitation Project		●		Project completed – 2 nd quarter 2015.
Scenic Highway – Spanish Town Road Phase II Area Rehabilitation Project			●	Project completed – 2 nd quarter 2016.
Siegen Lane – Interstate 10 Area Rehabilitation Project			●	Project completed – 2 nd quarter 2017.
Interstate 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.

Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Flannery Road – Florida Boulevard Phase II Area Rehabilitation Project			●	Project completed – 4th quarter 2018.
East Boulevard – Government Street Area Rehabilitation Project			●	Project completed – 3rd quarter 2017.
North 38 th Street – Gus Young Avenue Area Rehabilitation Project			●	Project completed – 3rd quarter 2018.

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

1.1.2.2 Category 2: Pump Station and Transmission Improvements

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

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

Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	

Project Descriptions RMAP2 Projects

Capitol Lake – Gayosa Street Area Capacity Improvements	●			Project completed - 2nd quarter 2012.
Gurney Road - Joor Road	●			Project completed - 4th quarter 2009.
Sullivan Rd./Lovett Rd./Wax Rd. Sewer Upgrades	●			Project completed - 1st quarter 2011.



Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
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.



	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	Project Status Summaries
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.
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.



	33% Milestone	66% Milestone	100% Milestone	
Milestone Date	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	Project Status Summaries
25th Street - North Acadian Thruway	●			Improvements designed under this project were constructed as part of the Capital Lake-Gayosa Drive Project and the South Blvd.-Saint 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 - 1st quarter 2016.
Plank Road – Kleinpeter Road Sewer Area Upgrades		●		Project completed - 1st quarter 2016.
O’Neal Lane Pipeline Improvements – Group A		●		Project completed - 4th quarter 2014.
O’Neal Lane Pipeline Improvements – Group B		●		Project completed - 2nd quarter 2015.
Multiple PS - Nicholson Dr - Brightside Dr		●		Project completed - 2nd quarter 2015.
Pump Station 58 Capacity Improvements		●		Project completed - 1st quarter 2015.
Staring Lane FM (Phase I - Burbank Drive to Highland Road)	●			Project completed - 2nd quarter 2010.
Staring Lane FM (Phase II - Highland road to Perkins Road)		●		Project completed - 4th quarter 2013.



Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
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.
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.



Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
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 - 1 st quarter 2016.
Pump Station 42 Forcemain - Phase I		●		Project complete - 3 rd quarter 2014.
Pump Station 42 Forcemain - Phase II		●		Project complete - 2 nd quarter 2014.
Central Consolidated Pump Stations		●		Project complete - 4 th quarter 2014.
Central Consolidated Forcemains-Phase I		●		Project complete - 3 rd quarter 2013.
Central Consolidated Forcemains-Phase II		●		Project complete - 3 rd quarter 2014.

1.1.2.3 Category 3: Wastewater Treatment and Storage

This category of projects includes improvements at the City/Parish WWTPs, as well as storage facilities throughout the service area. There are not any RMAP2 projects that have been identified at the North WWTP, but several projects were completed by the City/Parish to improve plant performance and odor control. Based on extensive evaluations in the *Draft Wastewater Master Plan* (May 2008), the existing Central WWTP had insufficient flows to justify the cost of renovation and upgrading for future requirements and was retired when the RMAP2 projects at the South WWTP were completed. Flows predicted for the current central service area were diverted to the South WWTP and adjustments were made in the South WWTP improvements to handle the increased flows.

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

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

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

- North – Choctaw Storage Facility
- North – Hooper Storage Facility

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

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

Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
Choctaw Storage and Pump Station Facility		●		Project completed – 3 rd quarter 2013.

Milestone Date	33% Milestone	66% Milestone	100% Milestone	Project Status Summaries
	1st QTR 2013	2nd QTR 2015	4th QTR 2018	
Construction Status	Functionally Complete*	Functionally Complete*	Functionally Complete*	
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 – 4th quarter 2018.
NWWTP Standby Generator Project	Complete	Complete	Project completed – 4th quarter 2018.
NWWTP Pretreatment & Grit Removal Rehabilitation Project	Complete	Complete	Project completed – 4th quarter 2018.
NWWTP General Electrical Rehabilitation Project	Complete	Complete	Project completed – 4th quarter 2018.
NWWTP Odor Control & Sodium Hypochlorite Project	Complete	Complete	Project completed – 4th quarter 2018.
North WWTP Sustainability Improvements Project	Complete	Complete	Project completed – 3rd quarter 2018.
NWWTP Master Plan Project #3 (Public Project) – Plant Buffer	Complete	Complete	Project completed – 3rd quarter 2018.
SWWTP Wet Weather Improvements – Phase II (Master Plan portion)	Complete	Complete	Project completed – 2nd quarter 2015.
Sewer System and WWTP Stand-by Power Program	Complete	Complete	Project completed – 4th quarter 2018.
SCADA (Collection System, Operations Data and Control Center)	Complete	Complete	Project completed – 4th quarter 2018.
Environmental Services Facility	Complete	Complete	Project completed – 2nd quarter 2017. (DES consolidated staff into one facility to facilitate communications and operations.)
NWWTP Odor Control Project	Complete	Complete	Project completed – 4th quarter 2010.
Comite –Foster Road Sewer Area Upgrades - Phase II	Complete	Complete	Project completed – 1st 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



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

1.1.4 Infiltration and Inflow Reduction Activities Summary

Another part of the Collection System Remedial Program identified in the Consent Decree Section XII is capital infiltration/inflow (I/I) reduction activities. Pursuant to item 35 in Section XII, the City/Parish is required to spend at least \$3 million annually for sewer repairs, sewer rehabilitation, and other capital expenditures related to reducing I/I in the North and South WWTP collection systems. The City/Parish spent approximately \$9.8 million; therefore, this goal was exceeded during 2024. 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 2024 to meet this requirement.

Table 6. I/I Reduction Activities Summary

Project	Description	% Complete	Contract Amount	Expenditures 2024
20-PN-MS-0087/ 23-PN-MS-0011	Annual Supplemental Point Repair	46%	\$4,500,000.00	\$ 2,049,725.90
19-PI-MS-0003	Sanitary Sewer Cleaning and Physical Inspection	100%	\$3,750,000.00	\$ 3,750,000.00
20-PN-MS-0088/ 23PN-MS-0010	Annual Sewer Repair and Replacement Project	72%	\$1,500,000.00	\$ 1,075,070.50
22-MH-UF-0012	Parish-wide Manhole Rehab	94%	\$1,500,000.00	\$ 1,406,837.10
19-ER-WC-0006/ 22-ER-WC-0009	Parish-wide Sewer Emergency Point Repairs	78%	\$2,000,000.00	\$ 1,569,547.29
		TOTAL	\$13,250,000.00	\$ 9,851,180.79



1.2 Treatment Facility Assessment

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

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

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

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. In accordance with the Consent Decree Exhibit G, the City/Parish also completed Phase II Monitoring as of December 31, 2021. The City/Parish completed the six (6) quarterly sampling events during the eight (8) quarters immediately after the completion of the RMAP construction projects.

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. As part of the 2024 LPDES permit renewal for the South Wastewater Treatment Plant and the North Wastewater Treatment Plant, the City-Parish petitioning the LDEQ to consider lowering the permitted percent removal requirements to 65%. This request was granted by LDEQ and became part of the latest LPDES permits that became effective on July 1, 2024 and August 1, 2024 for the South Wastewater Treatment Plant and the North Wastewater Treatment Plant respectively.

1.4.1 North WWTP

From January 2024 through July 2024, the North WWTP has been in compliance with the 85% effluent limits for BOD for 0 months of the 7 months and for TSS for 3 months of the 7 months of the reporting period, as shown in Table 7b.

Table 7a. 2023 Monthly Average Percent Removal for North Plant- LA0036439

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
BOD	77%	76%	70%	78%	80%	67%	79%	N/A	N/A	N/A	N/A	N/A
TSS	70%	76%	71%	81%	C	C	C	N/A	N/A	N/A	N/A	N/A

From August 2024 through December 2024, the North WWTP has been in compliance with the 65% effluent limits for BOD for 5 months of the 5 months and for TSS for 5 months of the 5 months of the reporting period, as shown in Table 7b.

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
BOD	N/A	N/A	N/A	N/A	N/A	N/A	N/A	C	C	C	C	C
TSS	N/A	N/A	N/A	N/A	N/A	N/A	N/A	C	C	C	C	C

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

From January 2024 through June 2024, the South WWTP has been in compliance with the 85% effluent limits for BOD for 4 months of the 6 months and for TSS for 0 months of the 6 months of the reporting period, as shown in Table 7b.



Table 7b. 2023 Monthly Average Percent Removal for South Plant- LA0036412

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
BOD	C	83%	78%	C	C	C	N/A	N/A	N/A	N/A	N/A	N/A
TSS	78%	81%	64%	83%	80%	78%	N/A	N/A	N/A	N/A	N/A	N/A

From July 2024 through December 2024, the South WWTP has been in compliance with the 65% effluent limits for BOD for 6 months of the 6 months and for TSS for 6 months of the 6 months of the reporting period, as shown in Table 7b.

Table 7b. 2023 Monthly Average Percent Removal for South Plant- LA0036412

	Jan.	Feb.	Mar.	Apr.	May	June	July	Aug.	Sept.	Oct.	Nov.	Dec.
BOD	N/A	N/A	N/A	N/A	N/A	N/A	C	C	C	C	C	C
TSS	N/A	N/A	N/A	N/A	N/A	N/A	C	C	C	C	C	C

1.5 Outreach and Public Awareness Program

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

Outreach and Public Awareness Program Plan implementation efforts have been on-going. Public information tools such as the website <http://brprojects.com/baton-rouge-ss0-program/> are being continuously updated with new information about the program, project information (including quarterly progress reports detailing the status of the projects), regulatory information and associated reference documents, and news articles about the SSO Control and Wastewater Facilities Program, etc. Fact sheets and brochures have also been developed that can be accessed via the website, and have been handed out during the public meetings, that describes pertinent information and aspects about the Program. Additionally, prior to any field work in areas, informational door hangers are also hung on those homes where inspection work will be taking place.

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.



DES continued the “Cap the Cleanout” campaign throughout the City-Parish. This effort includes representatives of DES going door to door to inspect and investigate open and damaged cleanouts throughout the City-Parish, mostly in high I/I Pump Station Basins. Within this effort, cleanout caps are being placed on the defective cleanouts, or repairs are being ordered to remediate the issue. Through this inspection process, when a defective cleanout is found on the private side, the homeowner receives a letter stating the impacts of open cleanouts to the sanitary sewer system, and the importance of repairing the damaged cleanout.

In January, DES and its representatives participated in a Dr. Martin Luther King, Jr. Day of Service Community Clean-up alongside District 6 Metro Councilman Cleve Dunn, Jr. The team worked a 6-block area, picking up trash and tires, and engaging with residents on the wastewater, solid waste, and recycling departments.

DES and its representatives have continued to work alongside homeowners as illicit connections to the sewer system are located through investigations. It is the City-Parish’s intent to adhere to the requirements of the Consent Decree and eliminate all openings allow stormwater into the system. When the burden falls on the homeowner to repair the openings, the City-Parish offers guidance and information on best practices to complete the work using formal letters and communications over the phone.

Additional outreach efforts included:

- Coordinated the DES School Outreach Committee to plan and implement 2024 school outreach and engagement initiatives, including student competitions and educator outreach
- Attended Science, Technology, Engineering, Arts, and Mathematics (STEAM) Day events at elementary and middle schools to conduct school outreach and educate students on stormwater quality, wipes, and FOG
- Facilitated a community information session and forum to share information on services provided by the department, including garbage, recycling, bulky, and out-of-cart waste collections
- Coordinated meeting between DES, public works staff, and Metro Council legislative aides in March 2024 to provide updates on key projects and initiatives within each council district throughout East Baton Rouge Parish and request input or feedback as to how services are being delivered to their constituents
- Placed several billboards throughout the parish focused on reducing litter, debris, and contaminants in waterways
- Placed several electronic billboards throughout the parish focused on non-flushable items and fats, oils, and greases.
- Conducted the semi-annual Household Hazardous Materials Collection Day to encourage residents to safely dispose of hazardous items and prevent improper disposal via toilets, sinks, storm drains, and standard garbage collection
- Participated in the Minority Business Enterprises Vendor Fair and a buyer-small business matchmaking session to connect with potential service-oriented vendors and explore contracting opportunities with the City-Parish’s sewer, wastewater, and stormwater management programs

- Led an educational campaign prior to Household Hazardous Materials Collection Day, leveraging billboards, radio advertisements, earned media, and social media to educate residents on proper disposal and hazardous materials
- Continued maintaining two webpages – brprojects.com and whatsgood.brla.gov – designed to provide information and educational resources to the public focused on the City-Parish’s SSO Program and wipe and FOG awareness initiatives
- Distributed a utility billing insert focused on the City-Parish’s SSO Program, flood awareness, and sewer usage fees

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 2023 are presented in Tables 8 and 9.

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

Penalties	Assessed	Paid	
		US DOJ	LDEQ
Civil Penalties	\$729,500	\$364,750	\$364,750
Past Stipulated Penalties (1988 Consent Decree)	\$216,000	\$216,000	

Note: These monetary stipulated penalties have been already paid by the City/Parish in 2002.

Table 9. Self-Reported Potential Stipulated Penalties 2024

Stipulated Penalties	Number	Cost Per Occurrence	Amount Accrued
Cross-Connection Identified & Non-Compliance with the Cross-Connection Elimination Plan	0	\$2,000 per day	\$0
<i>Unauthorized Discharges 2024</i>			
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



Stipulated Penalties	Number	Cost Per Occurrence	Amount Accrued
1 MG or more	7	\$5,000	\$35,000
<i>Non-Compliant Discharges (WWTP) 2024</i>			
Weekly Average Limits	13	\$1,000	\$13,000
Monthly (30-day average) Limits	27	\$2,500	\$67,500
Daily Limits	1	\$1,000	\$1,000
2024 Total Stipulated Penalties (through December 31, 2024)			\$116,500

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.

Attachment A
2024 Annual Report
Municipal Water Pollution Prevention
Environmental Audit Reports

Attachment A

Municipal Water Pollution Prevention Environmental Audit Reports

South Wastewater Treatment Plant & North Wastewater Treatment Plant

The latest LDPES permits for the South Wastewater Treatment Plant and the North Wastewater Treatment Plant became effective on July 1, 2024 and August 1, 2024, respectively. As part of the current permit, the City-Parish is required to complete an annual Environmental Audit Report under the Municipal Water Pollution Prevention section of the permit. The audit period is for January 1st through December 31st of each year and shall be completed and submitted by April 1st of the following year.

Previous permits required reporting periods of September 1st through August 31st. As such, the Louisiana Department of Environmental Quality is allowing the City-Parish to modify the reporting period for the September 1, 2023 through August 31, 2024 MWPP to September 1, 2023 through December 31, 2024 to align with the new permit. This audit will be submitted prior to April 1, 2025, and will be included in the 2025 Annual Report.