



**Alabama Department of Environmental Management**  
**adem.alabama.gov**

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**APRIL 23, 2025**

Chad Hare, General Manager  
The Water Works & Sewer Board of the City of Gadsden  
P.O. Box 800  
Gadsden, AL 35902

RE: Draft Permit  
NPDES Permit No. AL0053201  
Gadsden West River WWTP  
Etowah County, Alabama

Dear Mr. Hare:

Transmitted herein is a revised draft of the referenced permit.

We would appreciate your comments on the permit within **30 days** of the date of this letter. Please direct any comments of a technical or administrative nature to the undersigned.

By copy of this letter and the draft permit, we are also requesting comments within the same time frame from EPA.

Please be aware that Parts I.C.1.c and I.C.2.e of your permit require participation in the Department's Alabama Environmental Permitting and Compliance System (AEPACS) for submittal of DMRs and SSOs upon issuance of this permit unless valid justification as to why you cannot participate is submitted in writing. SSO hotline notifications and hard copy Form 415 SSO reports may be used only with the written approval from the Department. AEPACS allows ADEM to electronically validate and acknowledge receipt of the data. This improves the accuracy of reported compliance data and reduces costs to both the regulated community and ADEM. Please note that all AEPACS users can create the electronic DMRs and SSOs; however, only AEPACS users with certifier permissions will be able to submit the electronic DMRs and SSOs to ADEM.

Our records indicate that you have utilized the Department's web-based electronic environmental (E2) reporting system for submittal of discharge monitoring reports (DMRs) and sanitary sewer overflow (SSO) notifications/reports. The Department transitioned from the E2 Reporting System to the Alabama Environmental Permitting and Compliance System (AEPACS) for the submittal of DMRs and SSOs on November 15, 2021. AEPACS is an electronic system that allows facilities to apply for and maintain permits as well as submit other required applications, registrations, and certifications. In addition, the system allows facilities to submit required compliance reports or other information to the Department. The Department has used the E2 User account information to set up a similar User Profile in AEPACS based on the following criteria:

1. The user has logged in to E2 since October 1, 2019; and
2. The E2 user account is set up using a unique email address.

E2 users that met the above criteria will only need to establish an ADEM Web Portal account (<https://prd.adem.alabama.gov/awp>) under the same email address as their E2 account to have the same permissions in AEPACS as they did in E2. They will also automatically be linked to the same facilities they were in E2.

Please also be aware that Part IV.H of your permit requires that you develop, implement, and maintain a Sanitary Sewer Overflow Response Plan.

The Alabama Department of Environmental Management encourages you to voluntarily consider pollution prevention practices and alternatives at your facility. Pollution Prevention may assist you in complying with effluent limitations, and possibly reduce or eliminate monitoring requirements.

If you have questions regarding this permit or monitoring requirements, please contact Michael Simmons at [michael.simmons@adem.alabama.gov](mailto:michael.simmons@adem.alabama.gov) or (334) 274-4220.

Sincerely,

Michael N. Simmons  
Municipal Section  
Water Division

Enclosure

cc: Environmental Protection Agency Email  
Ms. Elaine Snyder/U.S. Fish and Wildlife Service  
Ms. Elizabeth Brown/Alabama Historical Commission  
Advisory Council on Historic Preservation  
Department of Conservation and Natural Resources

**Birmingham Office**  
110 Vulcan Road  
Birmingham, AL 35209-4702  
(205) 942-6168  
(205) 941-1603 (FAX)

**Decatur Office**  
2715 Sandlin Road, S.W.  
Decatur, AL 35603-1333  
(256) 353-1713  
(256) 340-9359 (FAX)

**Coastal Office**  
1615 South Broad Street  
Mobile, AL 36605  
(251) 450-3400  
(251) 479-2593 (FAX)





# NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT

**PERMITTEE:** THE WATER WORKS & SEWER BOARD OF THE CITY OF GADSDEN  
P.O. BOX 800  
GADSDEN, AL 35902

**FACILITY LOCATION:** GADSDEN WEST RIVER WWTP (11.32 MGD)  
2000 WILLS CREEK ROAD  
GADSDEN, ALABAMA  
ETOWAH COUNTY

**PERMIT NUMBER:** AL0053201

**RECEIVING WATERS:** COOSA RIVER (NEELY HENRY LAKE)  
BIG WILLS CREEK (NEELY HENRY LAKE) (STORMWATER ONLY)

*In accordance with and subject to the provisions of the Federal Water Pollution Control Act, as amended, 33 U.S.C. §§1251-1388 (the "FWPCA"), the Alabama Water Pollution Control Act, as amended, Code of Alabama 1975, §§ 22-22-1 to 22-22-14 (the "AWPCA"), the Alabama Environmental Management Act, as amended, Code of Alabama 1975, §§22-22A-1 to 22-22A-17, and rules and regulations adopted thereunder, and subject further to the terms and conditions set forth in this permit, the Permittee is hereby authorized to discharge into the above-named receiving waters.*

**ISSUANCE DATE:**

**EFFECTIVE DATE:**

**EXPIRATION DATE:**

## Draft

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Alabama Department of Environmental Management



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## PART I: DISCHARGE LIMITATIONS, CONDITIONS, AND REQUIREMENTS

### A. DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS

#### 1. DSN 0011: Industrial/Municipal Wastewater

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Oxygen, Dissolved (DO) (00300) Effluent Gross Value	*****	*****	*****	3.0 Minimum Daily	*****	*****	mg/l	2X Weekly	Grab	Not Seasonal
pH (00400) Effluent Gross Value	*****	*****	*****	6.0 Minimum Daily	*****	8.5 Maximum Daily	S.U.	2X Weekly	Grab	Not Seasonal
Solids, Total Suspended (00530) Effluent Gross Value	2832 Monthly Average	4248 Weekly Average	lbs/day	*****	30.0 Monthly Average	45.0 Weekly Average	mg/l	2X Weekly	24-Hr Composite	Not Seasonal
Solids, Total Suspended (00530) Raw Sew/Influent	(Report) Monthly Average	(Report) Weekly Average	lbs/day	*****	(Report) Monthly Average	(Report) Weekly Average	mg/l	2X Weekly	24-Hr Composite	Not Seasonal
Nitrogen, Ammonia Total (As N) (00610) Effluent Gross Value	1888 Monthly Average	2832 Weekly Average	lbs/day	*****	20.0 Monthly Average	30.0 Weekly Average	mg/l	2X Weekly	24-Hr Composite	Not Seasonal
Nitrogen, Kjeldahl Total (As N) (00625) Effluent Gross Value	2832 Monthly Average	4248 Weekly Average	lbs/day	*****	30.0 Monthly Average	45.0 Weekly Average	mg/l	2X Weekly	24-Hr Composite	Not Seasonal
Nitrite Plus Nitrate Total 1 Det. (As N) (00630) Effluent Gross Value	(Report) Monthly Average	(Report) Weekly Average	lbs/day	*****	(Report) Monthly Average	(Report) Weekly Average	mg/l	Monthly	24-Hr Composite	Not Seasonal
Phosphorus, Total (As P) (00665) Effluent Gross Value	(Report) Monthly Average	(Report) Weekly Average	lbs/day	*****	(Report) Monthly Average	(Report) Weekly Average	mg/l	Monthly	24-Hr Composite	W
Phosphorus, Total (As P) (00665) Effluent Gross Value	(Report) Monthly Average	(Report) Weekly Average	lbs/day	*****	1.0 Monthly Average	(Report) Weekly Average	mg/l	Monthly	24-Hr Composite	S

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) See Part IV.C. for Total Residual Chlorine (TRC). Monitoring for TRC is applicable if chlorine is utilized for disinfection purposes. If monitoring is not applicable during the monitoring period, enter “\*9” on the monthly DMR.

(4) A measurement of TRC below 0.05 mg/L shall be considered in compliance with the permit limitations above and should be reported as “\*B” on the monthly DMR.

(5) The E. Coli monthly average limit is to be reported as a geometric mean

# 1. DSN 0011 (Continued): Industrial/Municipal Wastewater

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Flow, In Conduit or Thru Treatment Plant (50050) Effluent Gross Value	(Report) Monthly Average	(Report) Maximum Daily	MGD	*****	*****	*****	*****	Daily	Continuous	Not Seasonal
Chlorine, Total Residual (50060) See note (3) Effluent Gross Value	*****	*****	*****	*****	0.716 Monthly Average	1.0 Maximum Daily	mg/l	2X Weekly	Grab	Not Seasonal
E. Coli (51040) See Note (5) Effluent Gross Value	*****	*****	*****	*****	548 Max Monthly Geometric Mean	2507 Maximum Daily	col/100mL	2X Weekly	Grab	ECW
E. Coli (51040) See Note (5) Effluent Gross Value	*****	*****	*****	*****	126 Max Monthly Geometric Mean	298 Maximum Daily	col/100mL	2X Weekly	Grab	ECS
BOD, Carbonaceous 05 Day, 20C (80082) Effluent Gross Value	1888 Monthly Average	2832 Weekly Average	lbs/day	*****	20.0 Monthly Average	30.0 Weekly Average	mg/l	2X Weekly	24-Hr Composite	Not Seasonal
BOD, Carbonaceous 05 Day, 20C (80082) Raw Sew/Influent	(Report) Monthly Average	(Report) Weekly Average	lbs/day	*****	(Report) Monthly Average	(Report) Weekly Average	mg/l	2X Weekly	24-Hr Composite	Not Seasonal
BOD, Carb-5 Day, 20 Deg C, Percent Remvl (80091) Percent Removal	*****	*****	*****	78.0 Monthly Average Minimum	*****	*****	%	Monthly	Calculated	Not Seasonal
Solids, Suspended Percent Removal (81011) Percent Removal	*****	*****	*****	85.0 Monthly Average Minimum	*****	*****	%	Monthly	Calculated	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) See Part IV.C. for Total Residual Chlorine (TRC). Monitoring for TRC is applicable if chlorine is utilized for disinfection purposes. If monitoring is not applicable during the monitoring period, enter “\*9” on the monthly DMR.

(4) A measurement of TRC below 0.05 mg/L shall be considered in compliance with the permit limitations above and should be reported as “\*B” on the monthly DMR.

(5) The E. Coli monthly average limit is to be reported as a geometric mean

## 2. DSN 001Q: Quarterly PFAS Monitoring

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Perfluorooctanoic Acid (51521) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorobutanoic Acid (51522) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorooctanesulfonamide (51525) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoropentanoic Acid (51623) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorohexanoic Acid (51624) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoroheptanoic Acid (51625) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorononanoic acid (51626) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorodecanoic Acid (51627) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoroundecanoic Acid (51628) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) EPA Method 1633, or alternative methods specifically approved by the Department, shall be used for the analyses of Per- and Polyfluorinated Alkyl Substances (PFAS).

(4) If only one sampling even occurs during a monitoring period, the sample result shall be reported on the DMRs as both the monthly and weekly average.

(5) Monitoring for PFAS is applicable upon acceptance of filter backwash and/or solids are received from the Gadsden Water Filtration Plant and thereafter. If monitoring is not applicable during the monitoring period (prior to accepting filter backwash and/or solids), enter “\*9” on the monthly DMR.

## 2. DSN 001Q (Continued): Quarterly PFAS Monitoring

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Perfluorododecanoic acid (51629) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorotridecanoic Acid (51630) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorotetradecanoic Acid (51631) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
N-ethyl perfluorooctanesulfonamidoethanol (51641) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
N-methyl perfluorooctanesulfonamidoethanol (51642) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
2-(N-ethyl-PFOSA) acetic acid (51643) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
2-(N-methyl-PFOSA) acetic acid (51644) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorobutanesulfonic acid (52602) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorodecanesulfonic acid (52603) See Notes (3,4,5) Effluent Gross Value	*****	*****	*****	*****	*****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) EPA Method 1633, or alternative methods specifically approved by the Department, shall be used for the analyses of Per- and Polyfluorinated Alkyl Substances (PFAS).

(4) If only one sampling even occurs during a monitoring period, the sample result shall be reported on the DMRs as both the monthly and weekly average.

(5) Monitoring for PFAS is applicable upon acceptance of filter backwash and/or solids are received from the Gadsden Water Filtration Plant and thereafter. If monitoring is not applicable during the monitoring period (prior to accepting filter backwash and/or solids), enter “\*9” on the monthly DMR.



## 2. DSN 001Q (Continued): Quarterly PFAS Monitoring

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Perfluoroheptanesulfonic acid (52604) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorohexanesulfonic acid (52605) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorooctanesulfonic acid (52606) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
1H,1H, 2H, 2H-Perfluorohexane sulfonic acid (52607) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
1H,1H, 2H, 2H-Perfluorooctane sulfonic acid (52608) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
1H,1H, 2H, 2H-Perfluorodecane sulfonic acid (52609) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoropentanesulfonic acid (52610) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorononanesulfonic acid (52611) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Hexafluoropropylene oxide dimer acid (52612) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) EPA Method 1633, or alternative methods specifically approved by the Department, shall be used for the analyses of Per- and Polyfluorinated Alkyl Substances (PFAS).

(4) If only one sampling even occurs during a monitoring period, the sample result shall be reported on the DMRs as both the monthly and weekly average.

(5) Monitoring for PFAS is applicable upon acceptance of filter backwash and/or solids are received from the Gadsden Water Filtration Plant and thereafter. If monitoring is not applicable during the monitoring period (prior to accepting filter backwash and/or solids), enter “\*9” on the monthly DMR.

## 2. DSN 001Q (Continued): Quarterly PFAS Monitoring

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Nonfluoro-3,6-dioxahexanoic acid (52626) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoro(2-ethoxyethane)sulfonic acid (52629) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluorododecanesulfonic acid (52632) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
4,8-Dioxo-3H-perfluorononanoic acid (52636) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
N-methyl perfluorooctanesulfonamide (52641) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
N-ethyl perfluorooctanesulfonamide (52642) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
3-Perfluoropropyl propanoic acid (PF001) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoro-3-methoxypropanoic acid (PF002) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid (PF003) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) EPA Method 1633, or alternative methods specifically approved by the Department, shall be used for the analyses of Per- and Polyfluorinated Alkyl Substances (PFAS).

(4) If only one sampling even occurs during a monitoring period, the sample result shall be reported on the DMRs as both the monthly and weekly average.

(5) Monitoring for PFAS is applicable upon acceptance of filter backwash and/or solids are received from the Gadsden Water Filtration Plant and thereafter. If monitoring is not applicable during the monitoring period (prior to accepting filter backwash and/or solids), enter “\*9” on the monthly DMR.

**2. DSN 001Q (Continued): Quarterly PFAS Monitoring**

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid (PF004) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
3-Perfluoroheptyl propanoic acid (PF005) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
Perfluoro-4-methoxybutanoic acid (PF006) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal
2H,2H,3H,3H-Perfluorooctanoic acid (PF007) See Notes (3,4,5) Effluent Gross Value	****	****	****	****	****	(Report) Single Sample	ng/l	Quarterly	Grab	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

(3) EPA Method 1633, or alternative methods specifically approved by the Department, shall be used for the analyses of Per- and Polyfluorinated Alkyl Substances (PFAS).

(4) If only one sampling even occurs during a monitoring period, the sample result shall be reported on the DMRs as both the monthly and weekly average.

(5) Monitoring for PFAS is applicable upon acceptance of filter backwash and/or solids are received from the Gadsden Water Filtration Plant and thereafter. If monitoring is not applicable during the monitoring period (prior to accepting filter backwash and/or solids), enter “\*9” on the monthly DMR.

### 3. DSN 001T: Toxicity Monitoring

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfall 001, which is described more fully in the Permittee's application. Such discharge shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
Toxicity, Ceriodaphnia Chronic (61426) Effluent Gross Value	*****	0 Single Sample	pass=0;fail=1	*****	*****	*****	*****	See Permit Requirements	24-Hr Composite	August
Toxicity, Pimephales Chronic (61428) Effluent Gross Value	*****	0 Single Sample	pass=0;fail=1	*****	*****	*****	*****	See Permit Requirements	24-Hr Composite	August

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

#### 4. DSN 002S and 003S: Stormwater Monitoring

During the period beginning on the effective date of this permit and lasting through the expiration date of this permit, the Permittee is authorized to discharge from Outfalls 002S and 003S, which are described more fully in the Permittee's application. Such discharges shall be limited and monitored by the Permittee as specified below:

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq See note (1)	Sample Type	Seasonal See note (2)
pH (00400) Stormwater	*****	*****	*****	(Report) Minimum Daily	*****	(Report) Maximum Daily	S.U.	Annually	Grab	Not Seasonal
Solids, Total Suspended (00530) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Annually	Grab	Not Seasonal
Oil & Grease (00556) Stormwater	*****	*****	*****	*****	*****	15.0 Maximum Daily	mg/l	Annually	Grab	Not Seasonal
Nitrogen, Ammonia Total (As N) (00610) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Annually	Grab	Not Seasonal
Nitrogen, Kjeldahl Total (As N) (00625) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Annually	Grab	Not Seasonal
Nitrite Plus Nitrate Total 1 Det. (As N) (00630) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Annually	Grab	Not Seasonal
Phosphorus, Total (As P) (00665) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Annually	Grab	Not Seasonal
Flow, In Conduit or Thru Treatment Plant (50050) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	MGD	Annually	Calculated	Not Seasonal
E. Coli (51040) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	col/100mL	Annually	Grab	Not Seasonal
BOD, Carbonaceous 05 Day, 20C (80082) Stormwater	*****	*****	*****	*****	*****	(Report) Maximum Daily	mg/l	Annually	Grab	Not Seasonal

See Part II.C.1. for Bypass and Part II.C.2. for Upset conditions.

(1) Sample Frequency – See also Part I.B.2

See Permit Requirements for Effluent Toxicity Testing in Part IV.B.

See Permit Requirements for Stormwater in Part IV.G

(2) S = Summer (April – October)

W = Winter (November - March)

ECS = E. coli Summer (May - October)

ECW = E. coli Winter (November - April)

## **B. DISCHARGE MONITORING AND RECORD KEEPING REQUIREMENTS**

### **1. Representative Sampling**

Sample collection and measurement actions shall be representative of the volume and nature of the monitored discharge and shall be in accordance with the provisions of this permit. The effluent sampling point shall be at the nearest accessible location just prior to discharge and after final treatment, unless otherwise specified in the permit.

### **2. Measurement Frequency**

Measurement frequency requirements found in Provision I.A. shall mean:

- a. Seven days per week shall mean daily.
- b. Five days per week shall mean any five days of discharge during a calendar weekly period of Sunday through Saturday.
- c. Three days per week shall mean any three days of discharge during a calendar week.
- d. Two days per week shall mean any two days of discharge during a calendar week.
- e. One day per week shall mean any day of discharge during a calendar week.
- f. Two days per month shall mean any two days of discharge during the month that are no less than seven days apart. However, if discharges occur only during one seven-day period in a month, then two days per month shall mean any two days of discharge during that seven day period.
- g. One day per month shall mean any day of discharge during the calendar month.
- h. Quarterly shall mean any day of discharge during each calendar quarter.
- i. The Permittee may increase the frequency of sampling, listed in Provisions I.B.2.a through I.B.2.h; however, all sampling results are to be reported to the Department.

### **3. Test Procedures**

For the purpose of reporting and compliance, permittees shall use one of the following procedures:

- a. For parameters with an EPA established Minimum Level (ML), report the measured value if the analytical result is at or above the ML and report "0" or "\*B" for values below the ML. Test procedures for the analysis of pollutants shall conform to 40 CFR Part 136 and guidelines published pursuant to Section 304(h) of the FWPCA, 33 U.S.C. Section 1314(h). If more than one method for analysis of a substance is approved for use, a method having a minimum level lower than the permit limit shall be used. If the minimum level of all methods is higher than the permit limit, the method having the lowest minimum level shall be used and a report of less than the minimum level shall be reported as zero and will constitute compliance, however should EPA approve a method with a lower minimum level during the term of this permit the permittee shall use the newly approved method.
- b. For pollutants parameters without an established ML, an interim ML may be utilized. The interim ML shall be calculated as 3.18 times the Method Detection Level (MDL) calculated pursuant to 40 CFR Part 136, Appendix B.

Permittees may develop an effluent matrix-specific ML, where an effluent matrix prevents attainment of the established ML. However, a matrix specific ML shall be based upon proper laboratory method and technique. Matrix-specific MLs must be approved by the Department, and may be developed by the permittee during permit issuance, reissuance, modification, or during compliance schedule.

In either case the measured value should be reported if the analytical result is at or above the ML and "0" or "\*B" reported for values below the ML.

- c. For parameters without an EPA established ML, interim ML, or matrix-specific ML, a report of less than the detection limit shall constitute compliance if the detection limit of all analytical methods is higher than the permit limit. For the purpose of calculating a monthly average, "0" shall be used for values reported less than the detection limit.

The Minimum Level utilized for procedures a and b above shall be reported on the permittee's DMR. When an EPA approved test procedure for analysis of a pollutant does not exist, the Director shall approve the procedure to be used.



**4. Recording of Results**

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The facility name and location, point source number, date, time and exact place of sampling;
- b. The name(s) of person(s) who obtained the samples or measurements;
- c. The dates and times the analyses were performed;
- d. The name(s) of the person(s) who performed the analyses;
- e. The analytical techniques or methods used, including source of method and method number; and
- f. The results of all required analyses.

**5. Records Retention and Production**

- a. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the above reports or the application for this permit, for a period of at least three years from the date of the sample measurement, report or application. This period may be extended by request of the Director at any time. If litigation or other enforcement action, under the AWPCA and/or the FWPCA, is ongoing which involves any of the above records, the records shall be kept until the litigation is resolved. Upon the written request of the Director or his designee, the permittee shall provide the Director with a copy of any record required to be retained by this paragraph. Copies of these records should not be submitted unless requested.
- b. All records required to be kept for a period of three years shall be kept at the permitted facility or an alternate location approved by the Department in writing and shall be available for inspection.

**6. Reduction, Suspension or Termination of Monitoring and/or Reporting**

- a. The Director may, with respect to any point source identified in Provision I.A. of this permit, authorize the permittee to reduce, suspend or terminate the monitoring and/or reporting required by this permit upon the submission of a written request for such reduction, suspension or termination by the permittee, supported by sufficient data which demonstrates to the satisfaction of the Director that the discharge from such point source will continuously meet the discharge limitations specified in Provision I.A. of this permit.
- b. It remains the responsibility of the permittee to comply with the monitoring and reporting requirements of this permit until written authorization to reduce, suspend or terminate such monitoring and/or reporting is received by the permittee from the Director.

**7. Monitoring Equipment and Instrumentation**

All equipment and instrumentation used to determine compliance with the requirements of this permit shall be installed, maintained, and calibrated in accordance with the manufacturer's instructions or, in the absence of manufacturer's instructions, in accordance with accepted practices. At a minimum, flow measurement devices shall be calibrated at least once every 12 months.

**C. DISCHARGE REPORTING REQUIREMENTS**

**1. Reporting of Monitoring Requirements**

- a. The permittee shall conduct the required monitoring in accordance with the following schedule:
  - (1) **MONITORING REQUIRED MORE FREQUENTLY THAN MONTHLY AND MONTHLY** shall be conducted during the first full month following the effective date of coverage under this permit and every month thereafter.
  - (2) **QUARTERLY MONITORING** shall be conducted at least once during each calendar quarter. Calendar quarters are the periods of January through March, April through June, July through September, and October through December. The permittee shall conduct the quarterly monitoring during the first complete calendar quarter following the effective date of this permit and is then required to monitor once during each quarter thereafter. Quarterly monitoring should be reported on the last DMR due for the quarter (i.e., March, June, September and December DMRs).

- (3) **SEMIANNUAL MONITORING** shall be conducted at least once during the period of January through June and at least once during the period of July through December. The permittee shall conduct the semiannual monitoring during the first complete calendar semiannual period following the effective date of this permit and is then required to monitor once during each semiannual period thereafter. Semiannual monitoring may be done anytime during the semiannual period, unless restricted elsewhere in this permit, but it should be reported on the last DMR due for the month of the semiannual period (i.e., June and December DMRs).
  - (4) **ANNUAL MONITORING** shall be conducted at least once during the period of January through December. The permittee shall conduct the annual monitoring during the first complete calendar annual period following the effective date of this permit and is then required to monitor once during each annual period thereafter. Annual monitoring may be done anytime during the year, unless restricted elsewhere in this permit, but it should be reported on the December DMR.
- b. The permittee shall submit discharge monitoring reports (DMRs) in accordance with the following schedule:
- (1) **REPORTS OF MORE FREQUENTLY THAN MONTHLY AND MONTHLY TESTING** shall be submitted on a monthly basis. The first report is due on the 28th day of the month following the month the permit becomes effective. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period, unless otherwise directed by the Department.
  - (2) **REPORTS OF QUARTERLY TESTING** shall be submitted on a quarterly basis. The first report is due on the 28th day of the month following the first complete calendar quarter the permit becomes effective. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period, unless otherwise directed by the Department.
  - (3) **REPORTS OF SEMIANNUAL TESTING** shall be submitted on a semiannual basis. The reports are due on the 28th day of JANUARY and the 28th day of JULY. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period, unless otherwise directed by the Department.
  - (4) **REPORTS OF ANNUAL TESTING** shall be submitted on an annual basis. Unless specified elsewhere in the permit, the first report is due on the 28th day of JANUARY. The reports shall be submitted so that they are received by the Department no later than the 28th day of the month following the reporting period, unless otherwise directed by the Department.
- c. Except as allowed by Provision I.C.1.c.(1) or (2), the permittee shall submit all Discharge Monitoring Reports (DMRs) required by Provision I.C.1.b. electronically.
- (1) If the permittee is unable to complete the electronic submittal of DMR data due to technical problems originating with the Department's electronic system (this could include entry/submittal issues with an entire set of DMRs or individual parameters), the permittee is not relieved of their obligation to submit DMR data to the Department by the date specified in Provision I.C.1.b., unless otherwise directed by the Department.

If the Department's electronic system is down on the 28th day of the month in which the DMR is due or is down for an extended period of time, as determined by the Department, when a DMR is required to be submitted, the permittee may submit the data in an alternate manner and format acceptable to the Department. Preapproved alternate acceptable methods include faxing, e-mailing, mailing, or hand-delivery of data such that they are received by the required reporting date. Within five calendar days of the Department's electronic system resuming operation, the permittee shall enter the data into the Department's electronic system, unless an alternate timeframe is approved by the Department. A comment should be included on the electronic DMR submittal verifying the original submittal date (date of the fax, copy of dated e-mail, or hand-delivery stamped date), if applicable.
  - (2) The permittee may submit a request to the Department for a temporary electronic reporting waiver for DMR submittals. The waiver request should include the permit number; permittee name; facility/site name; facility address; name, address, and contact information for the responsible official or duly authorized representative; a detailed statement regarding the basis for requesting such a waiver; and the duration for which the waiver is requested. Approved electronic reporting waivers are not transferrable.
  - (3) A permittee with an approved electronic reporting waiver for DMRs may submit hard copy DMRs for the period that the approved electronic reporting waiver request is effective. The permittee shall submit the Department-approved DMR forms to the address listed in Provision I.C.1.e.

- (4) If a permittee is allowed to submit a hard copy DMR, the DMR must be legible and bear an original signature. Photo and electronic copies of the signature are not acceptable and shall not satisfy the reporting requirements of this permit.
  - (5) If the permittee, using approved analytical methods as specified in Provision I.B.2, monitors any discharge from a point source for a limited substance identified in Provision I.A. of this permit more frequently than required by this permit, the results of such monitoring shall be included in the calculation and reporting of values on the DMR and the increased frequency shall be indicated on the DMR.
  - (6) In the event no discharge from a point source identified in Provision I.A. of this permit and described more fully in the permittee's application occurs during a monitoring period, the permittee shall report "No Discharge" for such period on the appropriate DMR.
- d. All reports and forms required to be submitted by this permit, the AWPCA and the Department's Rules and Regulations, shall be electronically signed (or, if allowed by the Department, traditionally signed) by a "responsible official" of the permittee as defined in ADEM Administrative Code Rule 335-6-6-.09 or a "duly authorized representative" of such official as defined in ADEM Administrative Code Rule 335-6-6-.09 and shall bear the following certification:
- "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."
- e. Discharge Monitoring Reports required by this permit, the AWPCA, and the Department's Rules that are being submitted in hard copy shall be addressed to:

**Alabama Department of Environmental Management  
Office of Water Services, Water Division  
Post Office Box 301463  
Montgomery, Alabama 36130-1463**

Certified and Registered Mail containing Discharge Monitoring Reports shall be addressed to:

**Alabama Department of Environmental Management  
Office of Water Services, Water Division  
1400 Coliseum Boulevard  
Montgomery, Alabama 36110-2400**

- f. All other correspondence and reports required to be submitted by this permit, the AWPCA, and the Department's Rules shall be addressed to:

**Alabama Department of Environmental Management  
Municipal Section, Water Division  
Post Office Box 301463  
Montgomery, Alabama 36130-1463**

Certified and Registered Mail shall be addressed to:

**Alabama Department of Environmental Management  
Municipal Section, Water Division  
1400 Coliseum Boulevard  
Montgomery, Alabama 36110-2400**

- g. If this permit is a reissuance, then the permittee shall continue to submit DMRs in accordance with the requirements of their previous permit until such time as DMRs are due as discussed in Part I.C.1.b. above.

## 2. Noncompliance Notifications and Reports

- a. The Permittee shall notify the Department if, for any reason, the Permittee's discharge:
- (1) Does not comply with any daily minimum or maximum discharge limitation for an effluent characteristic specified in Provision I.A. of this permit which is denoted by an "(X)";
  - (2) Potentially threatens human health or welfare;

- (3) Threatens fish or aquatic life;
- (4) Causes an in-stream water quality criterion to be exceeded;
- (5) Does not comply with an applicable toxic pollutant effluent standard or prohibition established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a);
- (6) Contains a quantity of a hazardous substance that may be harmful to public health or welfare under Section 311(b)(4) of the FWPCA, 33 U.S.C. Section 1321(b)(4);
- (7) Exceeds any discharge limitation for an effluent parameter listed in Part I.A. as a result of an unanticipated bypass or upset; or
- (8) Is an unpermitted direct or indirect discharge of a pollutant to a water of the state. (Note that unpermitted discharges properly reported to the Department under any other requirement are not required to be reported under this provision.)

The Permittee shall orally or electronically provide notification of any of the above occurrences, describing the circumstances and potential effects, to the Director or Designee within 24-hours after the Permittee becomes aware of the occurrence of such discharge. In addition to the oral or electronic notification, the Permittee shall submit a report to the Director or Designee, as provided in Provision I.C.2.c. or I.C.2.e., no later than five days after becoming aware of the occurrence of such discharge or occurrence.

- b. If, for any reason, the Permittee's discharge does not comply with any limitation of this permit, then the Permittee shall submit a written report to the Director or Designee, as provided in Provision I.C.2.c below. This report must be submitted with the next Discharge Monitoring Report required to be submitted by Provision I.C.1 of this permit after becoming aware of the occurrence of such noncompliance.
- c. Except for notifications and reports of notifiable SSOs which shall be submitted in accordance with the applicable Provisions of this permit, the Permittee shall submit the reports required under Provisions I.C.2.a. and b. to the Director or Designee on ADEM Form 421, available on the Department's website (<http://www.adem.state.al.us/DeptForms/Form421.pdf>). The completed Form must document the following information:
  - (1) A description of the discharge and cause of noncompliance;
  - (2) The period of noncompliance, including exact dates, times, and duration of the noncompliance. If the noncompliance is not corrected by the due date of the written report, then the Permittee shall provide an estimated date by which the noncompliance will be corrected; and
  - (3) A description of the steps taken by the Permittee and the steps planned to be taken by the Permittee to reduce or eliminate the noncompliant discharge and to prevent its recurrence.
- d. Immediate notification

The Permittee shall provide notification to the Director, the public, the county health department, and any other affected entity such as public water systems, as soon as possible upon becoming aware of any notifiable sanitary sewer overflow. Notification to the Director shall be completed utilizing the Department's web-based electronic environmental SSO reporting system in accordance with Provision I.C.2.e.

- e. The Department is utilizing an electronic system for notification and submittal of SSO reports. Except as noted below, the Permittee must submit all SSO reports electronically in the Department's electronic system. If requested, waivers from utilization of the electronic system shall be submitted in accordance with ADEM Admin. Code 335-6-1-.04(6). The Department's electronic reporting system shall be utilized unless a written waiver has been granted. A waiver is not effective until receipt of written approval from the Department. Utilization of verbal notifications and hard copy SSO report submittals is allowed only if approved in writing by the Department. The Permittee shall include in the SSO reports the information requested by ADEM Form 415. In addition, the Permittee shall include the latitude and longitude of the SSO in the report except when the SSO is a result of an extreme weather event (e.g., hurricane). To participate in the electronic system for SSO reports, an account may be created at <https://aepacs.adem.alabama.gov/nviro/ncore/external/home>. If the electronic system is down (i.e., electronic submittal of SSO data cannot be completed due to technical problems originating with the Department's system), the Permittee is not relieved of its obligation to notify the Department or submit SSO reports to the Department by the required submittal date, and the Permittee shall submit the data in an alternate manner and format acceptable to the Department. Preapproved alternate acceptable methods include verbal reports, reports submitted via the SSO hotline, or reports submitted via fax, e-mail, mail, or hand-delivery such that they are

received by the required reporting date. Within five calendar days of the electronic system resuming operation, the Permittee shall enter the data into the electronic system, unless an alternate timeframe is approved by the Department. For any alternate notification, records of the date, time, notification method, and person submitting the notification should be maintained by the Permittee. If a Permittee is allowed to submit SSO reports via an alternate method, the SSO report must be in a format approved by the Department and must be legible.

- f. The Permittee shall maintain a record of all known wastewater discharge points that are not authorized as permitted outfalls, including but not limited to SSOs. The Permittee shall include this record in its **Municipal Water Pollution Prevention (MWPP) Annual Reports**, which shall be submitted to the Department each year by May 31st for the prior calendar year period beginning January 1st and ending December 31st. The MWPP Annual Reports shall contain a list of all known wastewater discharge points that are not authorized as permitted outfalls and any discharges that occur prior to the headworks of the wastewater treatment plant covered by this permit. The Permittee shall also provide in the MWPP Annual Reports a list of any discharges reported during the applicable time period in accordance with Provision I.C.2.a. The Permittee shall include in its MWPP Annual Reports the following information for each known unpermitted discharge that occurred:
- (1) The cause of the discharge;
  - (2) Date, duration and volume of discharge (estimate if unknown);
  - (3) Description of the source (e.g., manhole, lift station);
  - (4) Location of the discharge, by latitude and longitude (or other appropriate method as approved by the Department);
  - (5) The ultimate destination of the flow (e.g., surface waterbody, municipal separate storm sewer to surface waterbody). Location should be shown on a USGS quad sheet or copy thereof; and
  - (6) Corrective actions taken and/or planned to eliminate future discharges.

#### **D. OTHER REPORTING AND NOTIFICATION REQUIREMENTS**

##### **1. Anticipated Noncompliance**

The permittee shall give the Director written advance notice of any planned changes or other circumstances regarding a facility which may result in noncompliance with permit requirements.

##### **2. Termination of Discharge**

The permittee shall notify the Director, in writing, when all discharges from any point source(s) identified in Provision I. A. of this permit have permanently ceased. This notification shall serve as sufficient cause for instituting procedures for modification or termination of the permit.

##### **3. Updating Information**

- a. The permittee shall inform the Director of any change in the permittee's mailing address or telephone number or in the permittee's designation of a facility contact or office having the authority and responsibility to prevent and abate violations of the AWPCA, the Department's Rules and the terms and conditions of this permit, in writing, no later than ten (10) days after such change. Upon request of the Director or his designee, the permittee shall furnish the Director with an update of any information provided in the permit application.
- b. If the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information with a written explanation for the mistake and/or omission.

##### **4. Duty to Provide Information**

The permittee shall furnish to the Director, within a reasonable time, any information which the Director or his designee may request to determine whether cause exists for modifying, revoking and re-issuing, suspending, or terminating this permit, in whole or in part, or to determine compliance with this permit.

**E. SCHEDULE OF COMPLIANCE**

**1. Compliance with discharge limits**

The permittee shall achieve compliance with the discharge limitations specified in Provision I. A. in accordance with the following schedule:

**COMPLIANCE SHALL BE ATTAINED ON THE EFFECTIVE DATE OF THIS PERMIT**

**2. Schedule**

No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance. In the latter case, the notice shall include the cause of noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.



## **PART II: OTHER REQUIREMENTS, RESPONSIBILITIES, AND DUTIES**

### **A. OPERATIONAL AND MANAGEMENT REQUIREMENTS**

#### **1. Facilities Operation and Maintenance**

The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of the permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of backup or auxiliary facilities only when necessary to achieve compliance with the conditions of the permit.

#### **2. Best Management Practices**

- a. Dilution water shall not be added to achieve compliance with discharge limitations except when the Director or his designee has granted prior written authorization for dilution to meet water quality requirements.
- b. The permittee shall prepare, implement, and maintain a Spill Prevention, Control and Countermeasures (SPCC) Plan in accordance with 40 C.F.R. Section 112 if required thereby.
- c. The permittee shall prepare, submit for approval and implement a Best Management Practices (BMP) Plan for containment of any or all process liquids or solids, in a manner such that these materials do not present a significant potential for discharge, if so required by the Director or his designee. When submitted and approved, the BMP Plan shall become a part of this permit and all requirements of the BMP Plan shall become requirements of this permit.

#### **3. Certified Operator**

The permittee shall not operate any wastewater treatment plant unless the competency of the operator to operate such plant has been duly certified by the Director pursuant to AWPCA, and meets the requirements specified in ADEM Administrative Code, Rule 335-10-1.

### **B. OTHER RESPONSIBILITIES**

#### **1. Duty to Mitigate Adverse Impacts**

The permittee shall promptly take all reasonable steps to mitigate and minimize or prevent any adverse impact on human health or the environment resulting from noncompliance with any discharge limitation specified in Provision I. A. of this permit, including such accelerated or additional monitoring of the discharge and/or the receiving waterbody as necessary to determine the nature and impact of the noncomplying discharge.

#### **2. Right of Entry and Inspection**

- a. The permittee shall allow the Director, or an authorized representative, upon the presentation of proper credentials and other documents as may be required by law to:
  - (1) Enter upon the permittee's premises where a regulated facility or activity or point source is located or conducted, or where records must be kept under the conditions of the permit;
  - (2) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permits;
  - (3) Inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under the permit; and
  - (4) Sample or monitor, for the purposes of assuring permit compliance or as otherwise authorized by the AWPCA, any substances or parameters at any location.

### **C. BYPASS AND UPSET**

#### **1. Bypass**

- a. Any bypass is prohibited except as provided in b. and c. below:
- b. A bypass is not prohibited if:
  - (1) It does not cause any discharge limitation specified in Provision I. A. of this permit to be exceeded;

- (2) It enters the same receiving stream as the permitted outfall; and
- (3) It is necessary for essential maintenance of a treatment or control facility or system to assure efficient operation of such facility or system.
- c. A bypass is not prohibited and need not meet the discharge limitations specified in Provision I. A. of this permit if:
  - (1) It is unavoidable to prevent loss of life, personal injury, or severe property damage;
  - (2) There are no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and
  - (3) The permittee submits a written request for authorization to bypass to the Director at least ten (10) days prior to the anticipated bypass (if possible), the permittee is granted such authorization, and the permittee complies with any conditions imposed by the Director to minimize any adverse impact on human health or the environment resulting from the bypass.
- d. The permittee has the burden of establishing that each of the conditions of Provision II. C. 1. b. or c. have been met to qualify for an exception to the general prohibition against bypassing contained in a. and an exemption, where applicable, from the discharge limitations specified in Provision I. A. of this permit.

**2. Upset**

- a. A discharge which results from an upset need not meet the discharge limitations specified in Provision I. A. of this permit if:
  - (1) No later than 24-hours after becoming aware of the occurrence of the upset, the Permittee orally reports the occurrence and circumstances of the upset to the Director or his designee; and
  - (2) No later than five (5) days after becoming aware of the occurrence of the upset, the Permittee furnishes the Director with evidence, including properly signed, contemporaneous operating logs, or other relevant evidence, demonstrating that:
    - (i) An upset occurred;
    - (ii) The Permittee can identify the specific cause(s) of the upset;
    - (iii) The Permittee's facility was being properly operated at the time of the upset; and
    - (iv) The Permittee promptly took all reasonable steps to minimize any adverse impact on human health or the environment resulting from the upset.
- b. The permittee has the burden of establishing that each of the conditions of Provision II. C. 2. a. of this permit have been met to qualify for an exemption from the discharge limitations specified in Provision I. A. of this permit.

**D. DUTY TO COMPLY WITH PERMIT, RULES, AND STATUTES**

**1. Duty to Comply**

- a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the AWPCA and the FWPCA and is grounds for enforcement action, permit termination, revocation and reissuance, suspension, modification, or denial of a permit renewal application.
- b. The necessity to halt or reduce production or other activities in order to maintain compliance with the conditions of the permit shall not be a defense for a permittee in an enforcement action.
- c. The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.
- d. The permittee shall take all reasonable steps, including cessation of production or other activities, to minimize or prevent any violation of this permit or to minimize or prevent any adverse impact of any permit violation.

- e. Nothing in this permit shall be construed to preclude or negate the Permittee's responsibility to apply for, obtain, or comply with other Federal, State, or Local Government permits, certifications, or licenses or to preclude from obtaining other federal, state, or local approvals, including those applicable to other ADEM programs and regulations.

**2. Removed Substances**

Solids, sludges, filter backwash, or any other pollutant or other waste removed in the course of treatment or control of wastewaters shall be disposed of in a manner that complies with all applicable Department Rules.

**3. Loss or Failure of Treatment Facilities**

Upon the loss or failure of any treatment facilities, including but not limited to the loss or failure of the primary source of power of the treatment facility, the permittee shall, where necessary to maintain compliance with the discharge limitations specified in Provision I. A. of this permit, or any other terms or conditions of this permit, cease, reduce, or otherwise control production and/or all discharges until treatment is restored. If control of discharge during loss or failure of the primary source of power is to be accomplished by means of alternate power sources, standby generators, or retention of inadequately treated effluent, the permittee must furnish to the Director within six months a certification that such control mechanisms have been installed.

**4. Compliance with Statutes and Rules**

- a. This permit has been issued under ADEM Administrative Code, Chapter 335-6-6. All provisions of this chapter, that are applicable to this permit, are hereby made a part of this permit. A copy of this chapter may be obtained for a small charge from the Office of General Counsel, Alabama Department of Environmental Management, 1400 Coliseum Boulevard Montgomery, Alabama 36110-2059.
- b. This permit does not authorize the noncompliance with or violation of any Laws of the State of Alabama or the United States of America or any regulations or rules implementing such laws. FWPCA, 33 U.S.C. Section 1319, and Code of Alabama 1975, Section 22-22-14.

**E. PERMIT TRANSFER, MODIFICATION, SUSPENSION, REVOCATION, AND REISSUANCE**

**1. Duty to Reapply or Notify of Intent to Cease Discharge**

- a. If the permittee intends to continue to discharge beyond the expiration date of this permit, the permittee shall file a complete permit application for reissuance of this permit at least 180 days prior to its expiration. If the permittee does not intend to continue discharge beyond the expiration of this permit, the permittee shall submit written notification of this intent which shall be signed by an individual meeting the signatory requirements for a permit application as set forth in ADEM Administrative Code Rule 335-6-6-.09.
- b. Failure of the permittee to apply for reissuance at least 180 days prior to permit expiration will void the automatic continuation of the expiring permit provided by ADEM Administrative Code Rule 335-6-6-.06 and should the permit not be reissued for any reason any discharge after expiration of this permit will be an unpermitted discharge.

**2. Change in Discharge**

Prior to any facility expansion, process modification or any significant change in the method of operation of the permittee's treatment works, the permittee shall provide the Director with information concerning the planned expansion, modification or change. The permittee shall apply for a permit modification at least 180 days prior to any facility expansion, process modification, significant change in the method of operation of the permittee's treatment works, or other actions that could result in the discharge of additional pollutants or increase the quantity of a discharged pollutant or could result in an additional discharge point. This condition applies to pollutants that are or that are not subject to discharge limitations in this permit. No new or increased discharge may begin until the Director has authorized it by issuance of a permit modification or a reissued permit.

**3. Transfer of Permit**

This permit may not be transferred or the name of the permittee changed without notice to the Director and subsequent modification or revocation and reissuance of the permit to identify the new permittee and to incorporate any other changes as may be required under the FWPCA or AWPCA. In the case of a change in name, ownership or control of the permittee's premises only, a request for permit modification in a format acceptable to the Director is required at least 30 days prior to the change. In the case of a change in name, ownership, or control of the permittee's premises accompanied by a change or proposed change in effluent characteristics, a complete permit application is required to

be submitted to the Director at least 180 days prior to the change. Whenever the Director is notified of a change in name, ownership, or control, he may decide not to modify the existing permit and require the submission of a new permit application.

#### **4. Permit Modification and Revocation**

- a. This permit may be modified or revoked and reissued, in whole or in part, during its term for cause, including but not limited to, the following:
  - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to revoke and reissue this permit instead of terminating the permit;
  - (2) If a request to transfer this permit has been received, the Director may decide to revoke and reissue or to modify the permit; or
  - (3) If modification or revocation and reissuance is requested by the permittee and cause exists, the Director may grant the request.
- b. This permit may be modified during its term for cause, including but not limited to, the following:
  - (1) If cause for termination under Provision II. E. 5. of this permit exists, the Director may choose to modify this permit instead of terminating this permit;
  - (2) There are material and substantial alterations or additions to the facility or activity generating wastewater which occurred after permit issuance which justify the application of permit conditions that are different or absent in the existing permit;
  - (3) The Director has received new information that was not available at the time of permit issuance and that would have justified the application of different permit conditions at the time of issuance;
  - (4) A new or revised requirement(s) of any applicable standard or limitation is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA;
  - (5) Errors in calculation of discharge limitations or typographical or clerical errors were made;
  - (6) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, when the standards or regulations on which the permit was based have been changed by promulgation of amended standards or regulations or by judicial decision after the permit was issued;
  - (7) To the extent allowed by ADEM Administrative Code, Rule 335-6-6-.17, permits may be modified to change compliance schedules;
  - (8) To agree with a granted variance under 301(c), 301(g), 301(h), 301(k), or 316(a) of the FWPCA or for fundamentally different factors;
  - (9) To incorporate an applicable 307(a) FWPCA toxic effluent standard or prohibition;
  - (10) When required by the reopener conditions in this permit;
  - (11) When required under 40 CFR 403.8(e) (compliance schedule for development of pretreatment program);
  - (12) Upon failure of the state to notify, as required by Section 402(b)(3) of the FWPCA, another state whose waters may be affected by a discharge permitted by this permit;
  - (13) When required to correct technical mistakes, such as errors in calculation, or mistaken interpretations of law made in determining permit conditions; or
  - (14) When requested by the permittee and the Director determines that the modification has cause and will not result in a violation of federal or state law, regulations or rules; or

#### **5. Termination**

This permit may be terminated during its term for cause, including but not limited to, the following:

- a. Violation of any term or condition of this permit;
- b. The permittee's misrepresentation or failure to disclose fully all relevant facts in the permit application or during the permit issuance process or the permittee's misrepresentation of any relevant facts at any time;
- c. Materially false or inaccurate statements or information in the permit application or the permit;

- d. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge;
- e. The permittee's discharge threatens human life or welfare or the maintenance of water quality standards;
- f. Permanent closure of the facility generating the wastewater permitted to be discharged by this permit or permanent cessation of wastewater discharge;
- g. New or revised requirements of any applicable standard or limitation that is promulgated under Sections 301(b)(2)(C), (D), (E), and (F), and 307(a)(2) of the FWPCA that the Director determines cannot be complied with by the permittee.
- h. Any other cause allowed by the ADEM Administrative Code, Chapter 335-6-6.

**6. Suspension**

This permit may be suspended during its term for noncompliance until the permittee has taken action(s) necessary to achieve compliance.

**7. Stay**

The filing of a request by the permittee for modification, suspension, or revocation of this permit, in whole or in part, does not stay any permit term or condition.

**F. COMPLIANCE WITH TOXIC POLLUTANT STANDARD OR PROHIBITION**

If any applicable effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under Section 307(a) of the FWPCA, 33 U.S.C. Section 1317(a), for a toxic pollutant discharged by the permittee and such standard or prohibition is more stringent than any discharge limitation on the pollutant specified in Provision I. A. of this permit, or controls a pollutant not limited in Provision I. A. of this permit, this permit shall be modified to conform to the toxic pollutant effluent standard or prohibition and the permittee shall be notified of such modification. If this permit has not been modified to conform to the toxic pollutant effluent standard or prohibition before the effective date of such standard or prohibition, the permittee shall attain compliance with the requirements of the standard or prohibition within the time period required by the standard or prohibition and shall continue to comply with the standard or prohibition until this permit is modified or reissued.

**G. NOTICE TO DIRECTOR OF INDUSTRIAL USERS**

1. The permittee shall not allow the introduction of wastewater, other than domestic wastewater, from a new direct discharger prior to approval and permitting, if applicable, of the discharge by the Department.
2. The permittee shall not allow an existing indirect discharger to increase the quantity or change the character of its wastewater, other than domestic wastewater, prior to approval and permitting, if applicable, of the increased discharge by the Department.
3. The permittee shall report to the Department any adverse impact caused or believed to be caused by an indirect discharger on the treatment process, quality of discharged water or quality of sludge. Such report shall be submitted within seven days of the permittee becoming aware of the adverse impacts.

**H. PROHIBITIONS**

The permittee shall not allow, and shall take effective enforcement action to prevent and terminate, the introduction of any of the following into its treatment works by industrial users:

1. Pollutants which create a fire or explosion hazard in the treatment works;
2. Pollutants which will cause corrosive structural damage to the treatment works, or dischargers with a pH lower than 5.0 s.u., unless the works are specifically designed to accommodate such discharges;
3. Solid or viscous pollutants in amounts which will cause obstruction of flow in sewers, or other interference with the treatment works;
4. Pollutants, including oxygen demanding pollutants, released in a discharge of such volume or strength as to cause interference in the treatment works;

5. Heat in amounts which will inhibit biological activity in the treatment plant resulting in interference or in such quantities that the temperature of the treatment plant influent exceeds 40 °C (104 °F) unless the treatment plant is designed to accommodate such heat;
6. Pollutants in amounts which exceed any applicable pretreatment standard under Section 307 of FWPCA or any approved revisions thereof.



## **PART III: ADDITIONAL REQUIREMENTS, CONDITIONS, AND LIMITATIONS**

### **A. CIVIL AND CRIMINAL LIABILITY**

#### **1. Tampering**

Any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained or performed under the permit shall, upon conviction, be subject to penalties as provided by the AWPCA.

#### **2. False Statements**

Any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be subject to penalties as provided by the AWPCA.

#### **3. Permit Enforcement**

- a. Any NPDES permit issued or reissued by the Department is a permit for the purpose of the AWPCA and the FWPCA and as such any terms, conditions, or limitations of the permit are enforceable under state and federal law.
- b. Any person required to have a NPDES permit pursuant to ADEM Administrative Code Chapter 335-6-6 and who discharges pollutants without said permit, who violates the conditions of said permit, who discharges pollutants in a manner not authorized by the permit, or who violates applicable orders of the Department or any applicable rule or standard of the Department, is subject to any one or combination of the following enforcement actions under applicable state statutes:
  - (1) An administrative order requiring abatement, compliance, mitigation, cessation, clean-up, and/or penalties;
  - (2) An action for damages;
  - (3) An action for injunctive relief; or
  - (4) An action for penalties.
- c. If the permittee is not in compliance with the conditions of an expiring or expired permit the Director may choose to do any or all of the following provided the permittee has made a timely and complete application for reissuance of the permit:
  - (1) Initiate enforcement action based upon the permit which has been continued;
  - (2) Issue a notice of intent to deny the permit reissuance. If the permit is denied, the owner or operator would then be required to cease the activities authorized by the continued permit or be subject to enforcement action for operating without a permit;
  - (3) Reissue the new permit with appropriate conditions; or
  - (4) Take other actions authorized by these rules and AWPCA.

#### **4. Relief from Liability**

Except as provided in Provision II. C. 1. (Bypass) and Provision II. C. 2. (Upset), nothing in this permit shall be construed to relieve the permittee of civil or criminal liability under the AWPCA or FWPCA for noncompliance with any term or condition of this permit.

### **B. OIL AND HAZARDOUS SUBSTANCE LIABILITY**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties to which the permittee is or may be subject under Section 311 of the FWPCA, 33 U.S.C. Section 1321.

### **C. PROPERTY AND OTHER RIGHTS**

This permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to persons or property or invasion of other private rights, or any infringement of federal, state, or local laws or regulations, nor does it authorize or approve the construction of any physical structures or facilities or the undertaking of any work in any waters of the state or of the United States.

#### **D. AVAILABILITY OF REPORTS**

Except for data determined to be confidential under Code of Alabama 1975, Section 22-22-9(c), all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the Department. Effluent data shall not be considered confidential.

#### **E. EXPIRATION OF PERMITS FOR NEW OR INCREASED DISCHARGES**

1. If this permit was issued for a new discharger or new source, this permit shall expire eighteen months after the issuance date if construction of the facility has not begun during the eighteen-month period.
2. If this permit was issued or modified to allow the discharge of increased quantities of pollutants to accommodate the modification of an existing facility, and if construction of this modification has not begun during the eighteen month period after issuance of this permit or permit modification, this permit shall be modified to reduce the quantities of pollutants allowed to be discharged to those levels that would have been allowed if the modification of the facility had not been planned.
3. Construction has begun when the owner or operator has:
  - a. Begun, or caused to begin as part of a continuous on-site construction program:
    - (1) Any placement, assembly, or installation of facilities or equipment; or
    - (2) Significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which are necessary for the placement, assembly, or installation of new source facilities or equipment; or
  - b. Entered into a binding contractual obligation for the purpose of placement, assembly, or installation of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this paragraph.
4. Final plans and specifications for a waste treatment facility at a new source or new discharger, or a modification to an existing waste treatment facility must be submitted to and examined by the Department prior to initiating construction of such treatment facility by the permittee.
5. Upon completion of construction of waste treatment facilities and prior to operation of such facilities, the permittee shall submit to the Department a certification from a registered professional engineer, licensed to practice in the State of Alabama, that the treatment facilities have been built according to plans and specifications submitted to and examined by the Department.

#### **F. COMPLIANCE WITH WATER QUALITY STANDARDS**

1. On the basis of the permittee's application, plans, or other available information, the Department has determined that compliance with the terms and conditions of this permit should assure compliance with the applicable water quality standards.
2. Compliance with permit terms and conditions notwithstanding, if the permittee's discharge(s) from point sources identified in Provision I. A. of this permit cause or contribute to a condition in contravention of state water quality standards, the Department may require abatement action to be taken by the permittee in emergency situations or modify the permit pursuant to the Department's Rules, or both.
3. If the Department determines, on the basis of a notice provided pursuant to this permit or any investigation, inspection or sampling, that a modification of this permit is necessary to assure maintenance of water quality standards or compliance with other provisions of the AWPCA or FWPCA, the Department may require such modification and, in cases of emergency, the Director may prohibit the discharge until the permit has been modified.

#### **G. GROUNDWATER**

Unless specifically authorized under this permit, this permit does not authorize the discharge of pollutants to groundwater. Should a threat of groundwater contamination occur, the Director may require groundwater monitoring to properly assess the degree of the problem, and the Director may require that the permittee undertake measures to abate any such discharge and/or contamination.

## H. DEFINITIONS

1. **Average monthly discharge limitation** - means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).
2. **Average weekly discharge limitation** - means the highest allowable average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week (zero discharge days shall not be included in the number of "daily discharges" measured and a less than detectable test result shall be treated as a concentration of zero if the most sensitive EPA approved method was used).
3. **Arithmetic Mean** – means the summation of the individual values of any set of values divided by the number of individual values.
4. **AWPCA** - means the Alabama Water Pollution Control Act.
5. **BOD** – means the five-day measure of the pollutant parameter biochemical oxygen demand.
6. **Bypass** - means the intentional diversion of waste streams from any portion of a treatment facility.
7. **CBOD** – means the five-day measure of the pollutant parameter carbonaceous biochemical oxygen demand.
8. **Daily discharge** - means the discharge of a pollutant measured during any consecutive 24-hour period in accordance with the sample type and analytical methodology specified by the discharge permit.
9. **Daily maximum** - means the highest value of any individual sample result obtained during a day.
10. **Daily minimum** - means the lowest value of any individual sample result obtained during a day.
11. **Day** - means any consecutive 24-hour period.
12. **Department** - means the Alabama Department of Environmental Management.
13. **Director** - means the Director of the Department.
14. **Discharge** - means "[t]he addition, introduction, leaking, spilling or emitting of any sewage, industrial waste, pollutant or other waste into waters of the state". Code of Alabama 1975, Section 22-22-1(b)(9).
15. **Discharge Monitoring Report (DMR)** - means the form approved by the Director to accomplish reporting requirements of an NPDES permit.
16. **DO** – means dissolved oxygen.
17. **8HC** – means 8-hour composite sample, including any of the following:
  - a. The mixing of at least 8 equal volume samples collected at constant time intervals of not more than 1 hour over a period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
  - b. A sample continuously collected at a constant rate over period of not less than 8 hours between the hours of 6:00 a.m. and 6:00 p.m. If the sampling period exceeds 8 hours, sampling may be conducted beyond the 6:00 a.m. to 6:00 p.m. period.
18. **EPA** - means the United States Environmental Protection Agency.
19. **FC** – means the pollutant parameter fecal coliform.
20. **Flow** – means the total volume of discharge in a 24-hour period.
21. **FWPCA** - means the Federal Water Pollution Control Act.
22. **Geometric Mean** – means the Nth root of the product of the individual values of any set of values where N is equal to the number of individual values. The geometric mean is equivalent to the antilog of the arithmetic mean of the logarithms of the individual values. For purposes of calculating the geometric mean, values of zero (0) shall be considered one (1).

23. **Grab Sample** – means a single influent or effluent portion which is not a composite sample. The sample(s) shall be collected at the period(s) most representative of the discharge.
24. **Indirect Discharger** – means a nondomestic discharger who discharges pollutants to a publicly owned treatment works or a privately owned treatment facility operated by another person.
25. **Industrial User** – means those industries identified in the Standard Industrial Classification manual, Bureau of the Budget 1967, as amended and supplemented, under the category “Division D – Manufacturing” and such other classes of significant waste producers as, by regulation, the Director deems appropriate.
26. **MGD** – means million gallons per day.
27. **Monthly Average** – means the arithmetic mean of all the composite or grab samples taken for the daily discharges collected in one month period. The monthly average for flow is the arithmetic mean of all flow measurements taken in a one month period.
28. **New Discharger** – means a person, owning or operating any building, structure, facility, or installation:
  - a) From which there is or may be a discharge of pollutants;
  - b) That did not commence the discharge of pollutants prior to August 13, 1979, and which is not a new source; and
  - c) Which has never received a final effective NPDES permit for dischargers at that site.
29. **NH3-N** – means the pollutant parameter ammonia, measured as nitrogen.
30. **Notifiable sanitary sewer overflow** - means an overflow, spill, release or diversion of wastewater from a sanitary sewer system that:
  - a) Reaches a surface water of the State; or
  - b) May imminently and substantially endanger human health based on potential for public exposure including but not limited to close proximity to public or private water supply wells or in areas where human contact would be likely to occur.
31. **Permit application** - means forms and additional information that is required by ADEM Administrative Code Rule 335-6-6-.08 and applicable permit fees.
32. **Point source** - means "any discernible, confined and discrete conveyance, including but not limited to any pipe, channel, ditch, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, . . . from which pollutants are or may be discharged." Section 502(14) of the FWPCA, 33 U.S.C. Section 1362(14).
33. **Pollutant** - includes for purposes of this permit, but is not limited to, those pollutants specified in Code of Alabama 1975, Section 22-22-1(b)(3) and those effluent characteristics specified in Provision I. A. of this permit.
34. **Privately Owned Treatment Works** – means any devices or system which is used to treat wastes from any facility whose operator is not the operator of the treatment works, and which is not a “POTW”.
35. **Publicly Owned Treatment Works (POTW)** – means a wastewater collection and treatment facility owned by the State, municipality, regional entity composed of two or more municipalities, or another entity created by the State or local authority for the purpose of collecting and treating municipal wastewater.
36. **Receiving Stream** – means the “waters” receiving a “discharge” from a “point source”.
37. **Severe property damage** - means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
38. **Significant Source** – means a source which discharges 0.025 MGD or more to a POTW or greater than five percent of the treatment work’s capacity, or a source which is a primary industry as defined by the U.S. EPA or which discharges a priority or toxic pollutant.
39. **TKN** – means the pollutant parameter Total Kjeldahl Nitrogen.
40. **TON** – means the pollutant parameter Total Organic Nitrogen.
41. **TRC** – means Total Residual Chlorine.

42. **TSS** – means the pollutant parameter Total Suspended Solids.
43. **24HC** – means 24-hour composite sample, including any of the following:
- a) The mixing of at least 8 equal volume samples collected at constant time intervals of not more than 2 hours over a period of 24 hours;
  - b) A sample collected over a consecutive 24-hour period using an automatic sampler composite to one sample. As a minimum, samples shall be collected hourly and each shall be no more than one twenty-fourth (1/24) of the total sample volume collected;
  - c) A sample collected over a consecutive 24-hour period using an automatic composite sampler composited proportional to flow.
44. **Upset** - means an exceptional incident in which there is an unintentional and temporary noncompliance with technology-based permit discharge limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
45. **Waters** - means "[a]ll waters of any river, stream, watercourse, pond, lake, coastal, ground or surface water, wholly or partially within the state, natural or artificial. This does not include waters which are entirely confined and retained completely upon the property of a single individual, partnership or corporation unless such waters are used in interstate commerce." Code of Alabama 1975, Section 22-22-1(b)(2). Waters "include all navigable waters" as defined in Section 502(7) of the FWPCA, 22 U.S.C. Section 1362(7), which are within the State of Alabama.
46. **Week** - means the period beginning at twelve midnight Saturday and ending at twelve midnight the following Saturday.
47. **Weekly (7-day and calendar week) Average** – is the arithmetic mean of all samples collected during a consecutive 7-day period or calendar week, whichever is applicable. The calendar week is defined as beginning on Sunday and ending on Saturday. Weekly averages shall be calculated for all calendar weeks with Saturdays in the month. If a calendar week overlaps two months (i.e., the Sunday is in one month and the Saturday in the following month), the weekly average calculated for the calendar week shall be included in the data for the month that contains the Saturday.

## **I. SEVERABILITY**

The provisions of this permit are severable, and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

## **PART IV: SPECIFIC REQUIREMENTS, CONDITIONS, AND LIMITATIONS**

### **A. SLUDGE MANAGEMENT PRACTICES**

#### **1. Applicability**

- a. Provisions of Provision IV.A. apply to a sewage sludge generated or treated in treatment works that is applied to agricultural and non-agricultural land, or that is otherwise distributed, marketed, incinerated, or disposed in landfills or surface disposal sites.
- b. Provisions of Provision IV.A. do not apply to:
  - (1) Sewage sludge generated or treated in a privately owned treatment works operated in conjunction with industrial manufacturing and processing facilities and which receive no domestic wastewater.
  - (2) Sewage sludge that is stored in surface impoundments located at the treatment works prior to ultimate disposal.

#### **2. Submitting Information**

- a. If applicable, the Permittee must submit annually with its Municipal Water Pollution Prevention (MWPP) report the following:
  - (1) Type of sludge stabilization/digestion method;
  - (2) Daily or annual sludge production (dry weight basis);
  - (3) Ultimate sludge disposal practice(s).
- b. The Permittee shall provide sludge inventory data to the Director as requested. These data may include, but are not limited to, sludge quantity and quality reported in Provision IV.A.2.a as well as other specific analyses required to comply with State and Federal laws regarding solid and hazardous waste disposal.
- c. The Permittee shall give prior notice to the Director of at least 30 days of any change planned in the Permittee's sludge disposal practices.

#### **3. Reopener or Modification**

- a. Upon review of information provided by the Permittee as required by Provision IV.A.2. or, based on the results of an on-site inspection, the permit shall be subject to modification to incorporate appropriate requirements.
- b. If an applicable "acceptable management practice" or if a numerical limitation for a pollutant in sewage sludge promulgated under Section 405 of FWPCA is more stringent than the sludge pollutant limit or acceptable management practice in this permit. This permit shall be modified or revoked or reissued to conform to requirements promulgated under Section 405. The Permittee shall comply with the limitations no later than the compliance deadline specified in applicable regulations as required by Section 405 of FWPCA.

### **B. EFFLUENT TOXICITY LIMITATIONS AND BIOMONITORING REQUIREMENTS FOR CHRONIC TOXICITY**

#### **1. Chronic Toxicity Test**

- a. The permittee shall perform short-term chronic toxicity tests on the wastewater at Outfall 0011.
- b. The samples shall be diluted using appropriate control water to the Instream Waste Concentration (IWC) which is 10 percent effluent. The IWC is the actual concentration of effluent, after mixing, in the receiving stream during a 7-day, 10-year low flow period.
- c. The samples shall be representative of the combined discharge flow from Gadsden West River WWTP (AL0053201) and Attalla Wastewater Treatment Lagoon (AL0057657). The samples may be taken after the combination of the flows from each facility or prior to combination and flow-weighted based on the actual flow from each facility during the sampling period.
- d. Any test result that shows a statistically significant reduction in survival, growth, or reproduction between the control and test samples at the 95% confidence level indicates chronic toxicity and shall constitute noncompliance with this permit.

#### **2. General Test Requirements**

- a. A minimum of three (3) 24-hour composite samples shall be obtained for use in the above biomonitoring tests. Samples shall be collected every other day so that the laboratory receives water samples on the first, third, and fifth day of the seven-day test period. The holding time for each composite sample shall not exceed 36 hours. The control water shall be a water prepared in the laboratory in accordance with the EPA procedure described in EPA 821-R-02-013 (most current edition) or another control water selected by the Permittee and approved by the Department.
- b. Test results shall be deemed unacceptable and the Permittee shall rerun the tests as soon as practical within the monitoring period for the following:
  - (1) For testing with *P. promelas*: effluent toxicity tests with control survival of less than 80% or if dry weight per surviving control organism is less than 0.25 mg;
  - (2) For testing with *C. dubia*: if the number of young per surviving control organism is less than 15 or if less than 60% of surviving control females produce three broods; or
  - (3) If the other requirements of the EPA Test Procedure are not met.
- c. In the event of an invalid test, upon subsequent completion of a valid test, the results of all tests, valid and invalid, are to be reported to the Department along with an explanation of the tests performed and the test results.
- d. Toxicity tests shall be conducted for the duration of this permit in the month of August. Should results from the Annual Toxicity test indicate that Outfall 0011 exhibits chronic toxicity, then the Permittee must conduct the follow-up testing described in Part IV.B.4.a. In addition, the Permittee may then also be required to conduct toxicity testing in the months of February, May, August, and November.

### 3. Reporting Requirements

- a. The Permittee shall notify the Department in writing within 48 hours after toxicity has been demonstrated by the scheduled test(s).
- b. Biomonitoring test results obtained during each monitoring period shall be summarized and reported using the appropriate Discharge Monitoring Report (DMR) form approved by the Department. In accordance with Section 2 of this part, an effluent toxicity report containing the information in Sections 2 and 6 shall be included with the DMR. The test results must be submitted to the Department no later than 28 days after the month that tests were performed.

### 4. Additional Testing Requirements

- a. If chronic toxicity is indicated (i.e., noncompliance with permit limit), then the Permittee must perform two additional valid chronic toxicity tests in accordance with these procedures to determine the extent and duration of the toxic condition. The toxicity tests shall run consecutively beginning on the first calendar week following the date that the Permittee became aware of the permit noncompliance. The results of these follow-up tests shall be submitted to the Department no later than 28 days following the month the tests were performed.
- b. After evaluation of the results of the follow-up tests, the Department will determine if additional action is appropriate and may require additional testing and/or toxicity reduction measures. The permittee may be required to perform a Toxicity Identification Evaluation (TIE) and/or a Toxicity Reduction Evaluation (TRE). The TIE/TRE shall be performed in accordance with the most recent protocols and guidance outlined by EPA (e.g., EPA/600/2-88/062, EPA/600/R-92/080, EPA/600/R-91-003, EPA/600/R-92/081, EPA/833/B-99/022, and/or EPA/600/6-91/005F)

### 5. Test Methods

The tests shall be performed in accordance with the latest edition of the "EPA Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms." The Larval Survival and Growth Test, Method 1000.0, shall be used for the fathead minnow (*Pimephales promelas*) test and the Survival and Reproduction Test, Method 1002.0, shall be used for the cladoceran (*Ceriodaphnia dubia*) test.

### 6. Effluent Toxicity Testing Reports

The following information shall be submitted with each DMR unless otherwise directed by the Department. The Department may at any times suspend or reinstate this requirement or may decrease or increase the frequency of submittals.

- a. Introduction

- (1) Facility name, location and county
  - (2) Permit number
  - (3) Toxicity testing requirements of permit
  - (4) Name of receiving water body
  - (5) Contract laboratory information (if tests are performed under contract)
    - (i) Name of firm
    - (ii) Telephone number
    - (iii) Address
  - (6) Objective of test
- b. Plant Operations
- (1) Discharge Operating schedule (if other than continuous)
  - (2) Volume of discharge during sample collection to include Mean daily discharge on sample collection dates (MGD, CFS, GPM)
  - (3) Design flow of treatment facility at time of sampling
- c. Source of Effluent and Dilution Water
- (1) Effluent samples
  - (2) Sampling point
  - (3) Sample collection dates and times (to include composite sample start and finish times)
  - (4) Sample collection method
  - (5) Physical and chemical data of undiluted effluent samples (water temperature, pH, alkalinity, hardness, specific conductance, total residual chlorine (if applicable), etc.)
  - (6) Lapsed time from sample collection to delivery
  - (7) Lapsed time from sample collection to test initiation
  - (8) Sample temperature when received at the laboratory
  - (9) Dilution Water
  - (10) Source
  - (11) Collection/preparation date(s) and time(s)
  - (12) Pretreatment (if applicable)
  - (13) Physical and chemical characteristics (water temperature, pH, alkalinity, hardness, specific conductance, etc.)
- d. Test Conditions
- (1) Toxicity test method utilized
  - (2) End point(s) of test
  - (3) Deviations from referenced method, if any, and reason(s)
  - (4) Date and time test started
  - (5) Date and time test terminated
  - (6) Type and volume of test chambers
  - (7) Volume of solution per chamber
  - (8) Number of organisms per test chamber
  - (9) Number of replicate test chambers per treatment



- (10) Test temperature, pH, and dissolved oxygen as recommended by the method (to include ranges)
- (11) Specify if aeration was needed
- (12) Feeding frequency, amount, and type of food
- (13) Specify if (and how) pH control measures were implemented
- (14) Light intensity (mean)

e. Test Organisms

- (1) Scientific name
- (2) Life stage and age
- (3) Source
- (4) Disease(s) treatment (if applicable)

f. Quality Assurance

- (1) Reference toxicant utilized and source
- (2) Date and time of most recent chronic reference toxicant test(s), raw data, and current control chart(s). (The most recent chronic reference toxicant test shall be conducted within 30 days of the routine.)
- (3) Dilution water utilized in reference toxicant test
- (4) Results of reference toxicant test(s) (NOEC, IC25, etc.); report concentration-response relationship and evaluate test sensitivity
- (5) Physical and chemical methods utilized

g. Results

- (1) Provide raw toxicity data in tabular form, including daily records of affected organisms in each concentration (including controls) and replicate
- (2) Provide table of endpoints: NOECs, IC25s, PASS/FAIL, etc. (as required in the applicable NPDES permit)
- (3) Indicate statistical methods used to calculate endpoints
- (4) Provide all physical and chemical data required by method
- (5) Results of test(s) (NOEC, IC25, PASS/FAIL, etc.), report concentration-response relationship (definitive test only), report percent minimum significant difference (PMSD) calculated for sublethal endpoints determined by hypothesis testing.

h. Conclusions and Recommendations

- (1) Relationship between test endpoints and permit limits
- (2) Actions to be taken

Adapted from "Short-Term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms", Fourth Edition, October 2002 (EPA 821-R-02-013), Section 10, Report Preparation.

**C. TOTAL RESIDUAL CHLORINE (TRC) REQUIREMENTS**

- 1. If chlorine is not utilized for disinfection purposes, TRC monitoring under Part I of this Permit is not required. If TRC monitoring is not required (conditional monitoring), "\*9" should be reported on the DMR forms.
- 2. Testing for TRC shall be conducted according to either the amperometric titration method or the DPD colorimetric method as specified in Section 408(C) or (E), Standards Methods for the Examination of Water and Wastewater, 18th edition. If chlorine is not detected prior to actual discharge to the receiving stream using one of these methods (i.e., the analytical result is less than the detection level), the Permittee shall report on the DMR form "\*B" or "0". The Permittee shall then be considered to be in compliance with the daily maximum concentration limit for TRC.
- 3. This permit contains a maximum allowable TRC level in the effluent. The Permittee is responsible for determining the minimum TRC level needed in the chlorine contact chamber to comply with E.coli limits. The effluent shall be dechlorinated if necessary to meet the maximum allowable effluent TRC level.

4. The sample collection point for effluent TRC shall be at a point downstream of the chlorine contact chamber (downstream of dechlorination, if applicable). The exact location is to be approved by the Director.

**D. PLANT CLASSIFICATION**

The Permittee shall report to the Director within 30 days of the effective date of this permit, the name, address and operator number of the certified wastewater operator in responsible charge of the facility. Unless specified elsewhere in this permit, this facility shall be classified in accordance with ADEM Admin. Code R. 335-10-1-.03.

**E. POLLUTANT SCANS**

The Permittee shall sample and analyze for the pollutants listed in 40 CFR 122 Appendix J Table 2. The Permittee shall provide data from a minimum of three samples collected within the four and one-half years prior to submitting a permit application. Samples must be representative of the seasonal variation in the discharge from each outfall.

**F. PER- AND POLYFLUOROALKYL SUBSTANCES (PFAS)**

1. Monitoring for PFAS is applicable if filter backwash and/or solids are received from the Gadsden Water Filtration Plant.
2. Reopener Clause

This permit may be revoked and reissued if new information becomes available. This information may include but is not limited to: new laws, regulations, policies, or additional technology requirements.

**G. MAJOR SOURCE STORMWATER REQUIREMENTS**

**1. Prohibitions**

- a. The Permittee shall not allow the discharge of non-storm water into permitted storm water outfall(s) unless said discharge is already subject to an NPDES permit.
- b. Pollutants removed in the course of treatment or control shall be disposed in a manner that complies with all applicable Department rules and regulations.

**2. Operational and Management Practices**

The permittee shall prepare and implement a Storm Water Pollution Prevention (SWPP) Plan within one year of the effective date of this permit.

- a. In the SWPP Plan, the Permittee shall:

- (1) Assess the treatment plant site by developing and presenting site drainage maps, materials inventory, and best management operational practices. The plan shall also include a description of all spill or leak sources;
- (2) Describe mechanisms and procedures to prevent the contact of sewage sludge, screenings, raw or partially treated wastewater, or any other waste product or pollutant with storm water discharged from the facility;
- (3) Provide for daily inspection on workdays of any structures that function to prevent storm water pollution or that remove pollutants from storm water;
- (4) Provide for daily inspection of the facility in general to ensure that the SWPP Plan is continually implemented and effective;
- (5) Include a Best Management Practices (BMP) Plan that, as a minimum, addresses housekeeping, preventative maintenance, spill prevention and response, and non-storm water discharges;
- (6) Describe mechanisms and procedures to provide sediment control sufficient to prevent or control storm water pollution storm water by particles resulting from soil or sediment migration from the site due to significant clearing, grading, or excavation activities;
- (7) Designate by position or name the person or persons responsible for the day to day implementation of the SWPP Plan; and
- (8) Bear the signature of an individual meeting signatory requirements as defined in ADEM Administrative Code, Rule 335-6-6-.09.

- b. The Director or his designee may notify the permittee at any time that the SWPP Plan is deficient and will require correction of the deficiency. The permittee shall correct any SWPP Plan deficiency identified by the Director or his designee within 30 days of receipt of notification and shall certify to the Department that the correction has been made and implemented.
- c. Administrative Procedures
  - (1) A copy of the SWPP Plan shall be maintained at the facility and shall be available for inspection by the Department.
  - (2) A log of daily inspections required by Provision IV.F.2.a.(3.) of the permit shall be maintained at the facility and shall be made available for inspection by the Department upon request. The log shall contain records of all inspections performed and each daily entry shall be signed by the person performing the inspection.
  - (3) The Permittee shall provide training for any personnel required to implement the SWPP Plan and shall retain documentation of such training at the facility. Training records for all personnel shall be available for inspection by the Department. Training shall be performed prior to the date implementation is required.

### 3. Monitoring Requirements

- a. Storm water discharged through each storm water outfall shall be sampled once per calendar year, using first flush grab samples (FFGS) collected during the first 30 minutes of discharge.
- b. The total volume of storm water discharged for the event must be monitored, including the date and duration (in hours) and rainfall (in inches) for the storm event(s) sampled. The duration between the storm event sampled and the end of the previous measurable (greater than 0.1 inch rainfall) storm event must be a minimum of 72 hours. This information must be recorded as part of the sampling procedure and records retained in accordance with Provision I.B.5. of this permit. The volume may be measured using flow measurement devices or may be estimated using any method approved in writing by the Department.

## H. SANITARY SEWER OVERFLOW RESPONSE PLAN

### 1. SSO Response Plan

Within 120 days of the effective date of this Permit, the Permittee shall develop a Sanitary Sewer Overflow (SSO) Response Plan to establish timely and effective methods for responding to notifiable sanitary sewer overflows. The SSO Response Plan shall address each of the following:

- a. General Information
  - (1) Approximate population of City/Town, if applicable
  - (2) Approximate number of customers served by the Permittee
  - (3) Identification of any subbasins designated by the Permittee, if applicable
  - (4) Identification of estimated linear feet of sanitary sewers
  - (5) Number of Pump/Lift Stations in the collection system
- b. Responsibility Information
  - (1) The title(s) and contact information of key position(s) who will coordinate the SSO response, including information for a backup coordinator in the event that the primary SSO coordinator is unavailable. The SSO coordinator is the person responsible for assessing the SSO and initiating a series of response actions based on the type, severity, and destination of the SSO, except for routine SSOs for which the coordinator may pre-approve written procedures. Routine SSOs are those for which the corrective action procedures are generally consistent.
  - (2) The title(s), and contact information of key position(s) who will respond to SSOs, including information for backup responder(s) in the event the primary responder(s) are unavailable (i.e., position(s) who provide notification to the Department, the public, the county health department, and other affected entities such as public water systems; position(s) responsible for organizing crews for response; position(s) responsible for addressing public inquiries)
- c. SSO and Surface Water Assessment

- (1) Identification of locations within the collection system at which an SSO is likely to occur (e.g., based upon historical SSOs, lift stations where electricity may be lost, etc.)
  - (2) A map of the general collection system area, including identification of surface waterbodies and the location(s) of public drinking water source(s). Mapping of all collection system piping, pump stations, etc. is not required; however, if this information is already available, it should be included.
  - (3) Identification of surface waterbodies within the collection system area which are classified as Swimming according to ADEM Admin. Code chap. 335-6-11. References available to assist in this requirement include the following: <http://adem.alabama.gov/alEnviroRegLaws/files/Division6Vol1.pdf> and <http://adem.alabama.gov/wqmap>.
  - (4) Identification of surface waterbodies within the collection system area which are not classified as Swimming as indicated in paragraph c above, but are known locally as areas where swimming occurs or as areas that are heavily recreated
- d. Public Reporting of SSOs
- (1) Contact information for the public to report an SSO to the Permittee, during both normal and outside of normal business hours (e.g., telephone number, website, email address, etc.)
  - (2) Information requested from the person reporting an SSO to assist the Permittee in identifying the SSO (e.g., date, time, location, contact information)
  - (3) Procedures for communication of the SSO report to the appropriate positions for follow-up investigation and response, if necessary
- e. Procedures to immediately notify the Department, the county health department, and other affected entities (such as public water systems) upon becoming aware of notifiable SSOs
- f. Public Notification Methods for SSOs
- (1) A listing of methods that are feasible, as determined by the Permittee, for public notifications (e.g., flyers distributed to nearby residents; signs posted at the location of the SSO, where the SSO enters a water of the state, and/or at a central public location; signs posted at fishing piers, boat launches, parks, swimming waterbodies, etc.; website and/or social media notifications; local print or radio and broadcast media notifications; "opt in" email, text message, or automated phone message notifications)
    - (i) If signage is a feasible method for public notification, procedures for use and removal of signage (e.g., availability and maintenance of signs, appropriate duration of postings)
  - (2) Minimum information to be included in public notifications (e.g., identification that an SSO has occurred, date, duration if known, estimated volume if known, location of the SSO by street address or other appropriate method, initial destination of the SSO)
  - (3) Procedures developed by the Permittee for determining the appropriate public notification method(s) based upon the potential for public exposure to health risks associated with the SSO
- g. Standard Procedures shall be developed by the Permittee and shall include, at a minimum
- (1) General SSO Response Procedures (e.g., procedures for dispatching staff to assess/correct an SSO; procedures for routine SSO corrective actions such as those for sewer blockages, overflowing manholes, line breakages, pump station power failure, etc.; procedures for disinfection of affected area, if applicable);
  - (2) Procedures for collection and proper disposal of the SSO, if feasible.
  - (3) General procedures for coordinating instream water quality monitoring, including, but not limited to, procedures for mobilizing staff, collecting samples, and typical test methods should the Department or the Permittee determine monitoring is appropriate following an SSO. Identification of a contractor who will collect and analyze the sample(s) may be listed in lieu of the procedures.
  - (4) References to other documents (such as Standard Operating Procedures for SSO Responses) may be acceptable for this section; however, the referenced document shall be identified and shall be reviewed at a frequency of at least that required by the Administrative Procedures Section.
- h. Date of the SSO Response Plan, dates of all modifications and/or reviews, the title and signature of the reviewer(s) for each date and the signature of the responsible official or the appropriate designee.

**2. SSO Response Plan Implementation**

Except as otherwise required by this Permit, the Permittee shall fully implement the SSO Response Plan as soon as practicable, but no later than 180 days after the effective date of this Permit.

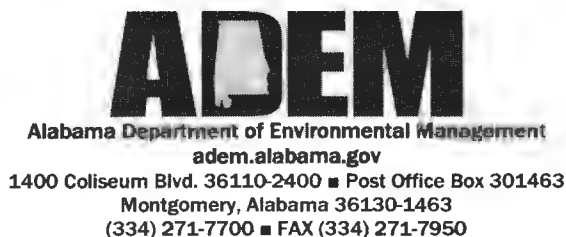
**3. Department Review of the SSO Response Plan**

- a. When requested by the Director or his designee, the Permittee shall make the SSO Response Plan available for review by the Department.
- b. Upon review, the Director or his designee may notify the Permittee that the SSO Response Plan is deficient and require modification of the Plan.
- c. Within thirty days of receipt of notification, or an alternate timeframe as approved by the Department, the Permittee shall modify any SSO Response Plan deficiency identified by the Director or his designee and shall certify to the Department that the modification has been made.

**4. SSO Response Plan Administrative Procedures**

- a. The Permittee shall maintain a copy of the SSO Response Plan at the permitted facility or an alternate location approved by the Department in writing and shall make it available for inspection by the Department.
- b. The Permittee shall make a copy of the SSO Response Plan available to the public upon written request within 30 days of such request. The Permittee may redact information which may present security issues, such as location of public water supplies, identification of specific details of vulnerabilities, employee information, etc.
- c. The Permittee shall provide training for any personnel required to implement the SSO Response Plan and shall retain at the facility documentation of such training. This documentation shall be available for inspection by the Department. Training shall be provided for existing personnel prior to the date by which implementation of the SSO Response Plan is required and for new personnel as soon as possible. Should significant revisions be made to the SSO Response Plan, training regarding the revisions shall be conducted as soon as possible.
- d. The Permittee shall complete a review and evaluation of the SSO Response Plan at least once every three years. Documentation of the SSO Response Plan review and evaluation shall be signed and dated by the responsible official or the appropriate designee as part of the SSO Response Plan.

LANCE R. LEFLEUR  
DIRECTOR



KAY IVEY  
GOVERNOR

## FACT SHEET

### APPLICATION FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT TO DISCHARGE POLLUTANTS TO WATERS OF THE STATE OF ALABAMA

Date Prepared: April 21, 2025

By: Michael Simmons

NPDES Permit No. AL0053201

**1. Name and Address of Applicant:**

The Water Works & Sewer Board of the City of Gadsden  
P.O. Box 800  
Gadsden, AL 35902

**2. Name and Address of Facility:**

Gadsden West River WWTP  
2000 Wills Creek Road  
Gadsden, AL 35904

**3. Description of Applicant's Type of Facility and/or Activity Generating the Discharge:**

Discharge Type(s): Surface Water  
Treatment Method(s): Mechanical (WWTP)

**4. Applicant's Receiving Waters**

Feature ID	Receiving Water	Classification
0011	Coosa River (Neely Henry Lake)	Fish and Wildlife
002S	Big Wills Creek (Neely Henry Lake)	Fish and Wildlife
003S	Big Wills Creek (Neely Henry Lake)	Fish and Wildlife

For the Outfall latitude and longitude see the permit application.

**5. Permit Conditions:**

See attached Rationale and Draft Permit.

**6. PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS**

**a. Comment Period**

The Alabama Department of Environmental Management proposes to issue this NPDES permit subject to the limitations and special conditions outlined above. This determination is tentative.

Interested persons are invited to submit written comments on the draft permit to the following address:

**Daphne Y. Lutz, Chief**  
**ADEM-Water Division**  
**1400 Coliseum Blvd**  
**[Mailing Address: Post Office Box 301463; Zip 36130-1463]**  
**Montgomery, Alabama 36110-2400**  
**(334) 271-7823**  
**[water-permits@adem.alabama.gov](mailto:water-permits@adem.alabama.gov)**

All comments received prior to the closure of the public notice period (see public notice for date) will be considered in the formulation of the final determination with regard to this permit.

**b. Public Hearing**

A written request for a public hearing may be filed within the public notice period and must state the nature of the issues proposed to be raised in the hearing. A request for a hearing should be filed with the Department at the following address:

**Daphne Y. Lutz, Chief**  
**ADEM-Water Division**  
**1400 Coliseum Blvd**  
**[Mailing Address: Post Office Box 301463; Zip 36130-1463]**  
**Montgomery, Alabama 36110-2400**  
**(334) 271-7823**  
**[water-permits@adem.alabama.gov](mailto:water-permits@adem.alabama.gov)**

The Director shall hold a public hearing whenever it is found, on the basis of hearing requests, that there exists a significant degree of public interest in a permit application or draft permit. The Director may hold a public hearing whenever such a hearing might clarify one or more issues involved in the permit decision. Public notice of such a hearing will be made in accordance with ADEM Admin. Code r. 335-6-6-.21.

**c. Issuance of the Permit**

All comments received during the public comment period shall be considered in making the final permit decision. At the time that any final permit decision is issued, the Department shall prepare a response to comments in accordance with ADEM Admin. Code r. 335-6-6-.21. The permit record, including the response to comments, will be available to the public via the eFile System <http://app.adem.alabama.gov/eFile/> or an appointment to review the record may be made by writing the Permits and Services Division at the above address.

Unless a request for a stay of a permit or permit provision is granted by the Environmental Management Commission, the proposed permit contained in the Director's determination shall be issued and effective, and such issuance will be the final administrative action of the Alabama Department of Environmental Management.

**d. Appeal Procedures**

As allowed under ADEM Admin. Code chap. 335-2-1, any person aggrieved by the Department's final administrative action may file a request for hearing to contest such action. Such requests should be received by the Environmental Management Commission within thirty days of issuance of the permit. Requests should be filed with the Commission at the following address:

**Alabama Environmental Management Commission  
1400 Coliseum Blvd  
[Mailing Address: Post Office Box 301463; Zip 36130-1463]  
Montgomery, Alabama 36110-2400**

All requests must be in writing and shall contain the information provided in ADEM Admin. Code r. 335-2-1-.04.



**FACT SHEET**

**APPLICATION FOR  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
PERMIT TO DISCHARGE POLLUTANTS TO WATERS OF  
THE STATE OF ALABAMA**

**Date Prepared:** April 21, 2025

**By:** Michael Simmons

**NPDES Permit No.** AL0053201

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Treatment Method(s): Mechanical (WWTP)

**4. Applicant's Receiving Waters**

Feature ID	Receiving Water	Classification
0011	Coosa River (Neely Henry Lake)	Fish and Wildlife
002S	Big Wills Creek (Neely Henry Lake)	Fish and Wildlife
003S	Big Wills Creek (Neely Henry Lake)	Fish and Wildlife

For the Outfall latitude and longitude see the permit application.

**5. Permit Conditions:**

See attached Rationale and Draft Permit.

**6. PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS**

**a. Comment Period**

The Alabama Department of Environmental Management proposes to issue this NPDES permit subject to the limitations and special conditions outlined above. This determination is tentative.

Interested persons are invited to submit written comments on the draft permit to the following address:

**Daphne Y. Lutz, Chief**  
**ADEM-Water Division**  
**1400 Coliseum Blvd**  
**[Mailing Address: Post Office Box 301463; Zip 36130-1463]**  
**Montgomery, Alabama 36110-2400**  
**(334) 271-7823**  
**[water-permits@adem.alabama.gov](mailto:water-permits@adem.alabama.gov)**

All comments received prior to the closure of the public notice period (see public notice for date) will be considered in the formulation of the final determination with regard to this permit.

**b. Public Hearing**

A written request for a public hearing may be filed within the public notice period and must state the nature of the issues proposed to be raised in the hearing. A request for a hearing should be filed with the Department at the following address:

**Daphne Y. Lutz, Chief**  
**ADEM-Water Division**  
**1400 Coliseum Blvd**  
**[Mailing Address: Post Office Box 301463; Zip 36130-1463]**  
**Montgomery, Alabama 36110-2400**  
**(334) 271-7823**  
**[water-permits@adem.alabama.gov](mailto:water-permits@adem.alabama.gov)**

The Director shall hold a public hearing whenever it is found, on the basis of hearing requests, that there exists a significant degree of public interest in a permit application or draft permit. The Director may hold a public hearing whenever such a hearing might clarify one or more issues involved in the permit decision. Public notice of such a hearing will be made in accordance with ADEM Admin. Code r. 335-6-6-.21.

**c. Issuance of the Permit**

All comments received during the public comment period shall be considered in making the final permit decision. At the time that any final permit decision is issued, the Department shall prepare a response to comments in accordance with ADEM Admin. Code r. 335-6-6-.21. The permit record, including the response to comments, will be available to the public via the eFile System <http://app.adem.alabama.gov/eFile/> or an appointment to review the record may be made by writing the Permits and Services Division at the above address.

Unless a request for a stay of a permit or permit provision is granted by the Environmental Management Commission, the proposed permit contained in the Director's determination shall be issued and effective, and such issuance will be the final administrative action of the Alabama Department of Environmental Management.

**d. Appeal Procedures**

As allowed under ADEM Admin. Code chap. 335-2-1, any person aggrieved by the Department's final administrative action may file a request for hearing to contest such action. Such requests should be received by the Environmental Management Commission within thirty days of issuance of the permit. Requests should be filed with the Commission at the following address:

**Alabama Environmental Management Commission  
1400 Coliseum Blvd  
[Mailing Address: Post Office Box 301463; Zip 36130-1463]  
Montgomery, Alabama 36110-2400**

All requests must be in writing and shall contain the information provided in ADEM Admin. Code r. 335-2-1-.04.

## NPDES PERMIT RATIONALE

NPDES Permit No: **AL0053201**

Date: March 9, 2023

Revision: June 14, 2024

Revision: September 12, 2024

Revision: April 22, 2025

Permit Applicant: The Water Works & Sewer Board of the City of Gadsden  
P.O. Box 800  
Gadsden, AL 35902

Location: **Gadsden West River WWTP**  
2000 Wills Creek Road  
Gadsden, AL 35904

Draft Permit is: Initial Issuance:  
Reissuance due to expiration: **X**  
Modification of existing permit:  
Revocation and Reissuance:

Basis for Limitations: Water Quality Model: CBOD<sub>5</sub>, DO, NH<sub>3</sub>-N, TKN  
Reissuance with no modification: CBOD<sub>5</sub>, CBOD<sub>5</sub> % Removal, DO, E. Coli, NH<sub>3</sub>-N, pH, TKN, TP, TSS, TSS% Removal  
Instream calculation at 7Q10: 10%  
Toxicity based: TRC  
Secondary Treatment Levels: CBOD<sub>5</sub> % Removal, TSS, TSS % Removal  
Other (described below): E. Coli, pH, TP

Design Flow in Million Gallons per Day: 11.32 MGD

Major: Yes

Description of Discharge:

Feature ID	Description	Receiving Water	WBC	303(d)	TMDL
0011	Industrial/Municipal Wastewater	Coosa River (Neely Henry Lake)	Fish and Wildlife	No	Yes
002S	Stormwater Monitoring	Big Wills Creek (Neely Henry Lake)	Fish and Wildlife	Yes	No
003S	Stormwater Monitoring	Big Wills Creek (Neely Henry Lake)	Fish and Wildlife	Yes	No

### Discussion:

This is a permit reissuance due to expiration. Gadsden West River WWTP and Attalla Wastewater Treatment Lagoon (AL0057657) shared a combined outfall to the Coosa River (Neely Henry Lake). Limits for Five Day Carbonaceous Biochemical Oxygen Demand (CBOD<sub>5</sub>), Dissolved Oxygen (DO), Total Ammonia-Nitrogen (NH<sub>3</sub>-N), and Total Kjeldahl Nitrogen (TKN), were developed based on a Waste Load Allocation (WLA) model that was completed by ADEM's Water Quality Branch (WQB) on December 20, 2022. The monthly average limits for CBOD<sub>5</sub>, NH<sub>3</sub>-N, and TKN are 20.0 mg/L, 20.0 mg/L and 30.0, respectively. The daily minimum DO limit is 3.0 mg/L.

This facility was included in the EPA approved 2008 Coosa River Basin Total Maximum Daily Loads (TMDL) with a discharge capacity of 11.32 MGD. The TMDL states that major dischargers (design capacity greater than 1 MGD) must attain a growing season (April-October) Total Phosphorus (TP) limit of 1.0 mg/L. The TMDL also imposes a pH between 6.0 and 8.5 S.U for Neely Henry Lake.

The Total Residual Chlorine (TRC) limits of 0.716 mg/L (monthly average) and 1.0 mg/L (daily maximum) are based on EPA's recommended water quality values and on the current Toxicity Rationale, which considers the available dilution in the receiving stream. In accordance with a letter dated August 11, 1998 from EPA Headquarters and a 1991 memorandum from EPA Region 4's Environmental Services Division (ESD), due to testing and method detection limitations, a Total Residual Chlorine measurement below 0.05 mg/L shall be considered below detection for compliance purposes. Monitoring for TRC is only applicable if chlorine is utilized for disinfection purposes. If monitoring is not applicable during the monitoring period, enter “\*9” on the monthly DMR.

The imposed *E. Coli* limits were determined based on the water-use classification of the receiving stream. Since this segment of Coosa River (Neely Henry Lake) is classified as Fish & Wildlife, the limits for May – October are 126 col/100ml (monthly average) and 298 col/100ml (daily maximum), while the limits for November – April are 548 col/100ml (monthly average) and 2507 col/100ml (daily maximum). The *E.Coli* monthly average limit is to be reported as a geometric mean.

The Total Suspended Solids (TSS) and TSS % removal limits of 30.0 mg/L monthly average and 85.0%, respectively, are based on the requirements of 40 CFR part 133.102 regarding Secondary Treatment. A minimum percent removal of 85% is imposed for CBOD<sub>5</sub> also in accordance with 40 CFR 133.102 regarding Secondary Treatment

This permit requires the Permittee to monitor and report the nutrient-related parameters of Nitrate plus Nitrite Nitrogen (NO<sub>2</sub>+NO<sub>3</sub>-N) and Total Phosphorus (TP) (Winter Only). Monitoring for these nutrient related parameters is imposed so that sufficient information will be available regarding the nutrient contribution from this point source, should it be necessary at some later time to impose further nutrient limits on this discharge.

Storm water runoff monitoring is being imposed by this permit based on 40 CFR Part 122. The designated outfalls for storm water runoff monitoring are 002S and 003S. Storm water runoff is to be monitored annually. The annual monitoring required includes: CBOD<sub>5</sub>, *E. Coli*, Flow Rate, NH<sub>3</sub>-N, NO<sub>2</sub>+NO<sub>3</sub>-N, Oil and Grease, pH, TKN, TP and TSS.

Because this is a major facility (design capacity greater than 1 MGD) treating both municipal and industrial wastewater, chronic toxicity testing with two species (*Ceriodaphnia* and *Pimephales*) is being imposed on this permit. Toxicity testing is imposed for both survival and life-cycle impairment (i.e., growth and reproduction). Chronic toxicity at the IWC of 10 percent is required once per year during the month of August. The samples shall be representative of the combined flow from the Gadsden West River WWTP and the Attalla Wastewater Treatment Lagoon (AL0053201). The samples may be taken after the combination of the flows from each facility or prior to combination and flow weighted based on the actual flow from each facility during the sampling period. If the toxicity tests of the effluent from Outfall 0011 indicate chronic toxicity, then toxicity tests may be required to be conducted during the months of February, May, August and November.

Because this is a major facility treating both municipal and industrial wastewater, the Department completed a reasonable potential analysis (RPA) of the discharge based on the application data, DMR data, and background data from station NEES-2. All background data test results were Below Detect except for hardness. The RPA indicates whether pollutants in treated effluent have potential to contribute to excursions of Alabama's in-stream water quality standards. Based on the analytical data submitted by the Permittee, it does not appear there is reasonable potential to cause an in-stream water quality criteria exceedance at this time.

The permit requires monitoring for multiple PFAs due to receipt of materials which may contain PFAs and EPA's research on Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS) as pollutants of concern. Currently there are no established PFOA or PFOS levels of concern for wastewater discharges. Some of the PFAS which are included in the permit are precursors that may break down into PFOA and PFOS. If EPA establishes PFC levels for wastewater, the permit will be reviewed to determine if modifications are necessary. Monitoring for PFAS is applicable upon initial acceptance of filter backwash and/or solids from the Gadsden Water Filtration Plant and thereafter.

The monitoring frequency for CBOD<sub>5</sub>, DO, *E. Coli*, NH<sub>3</sub>-N, pH, TKN, TRC and TSS is twice per week. The monitoring frequency for NO<sub>2</sub>+NO<sub>3</sub>-N and TP is once per month. CBOD<sub>5</sub> % removal and TSS % removal are to be

calculated once per month. Monitoring for PFCs is to be conducted quarterly. Flow is to be continuously monitored daily.

This segment of Coosa River (Neely Henry Lake) is a Tier I stream and is not listed on the most recent 303(d) list. The limits imposed in this permit are consistent with 2008 organic enrichment, nutrients, and pH Coosa River Basin TMDL.

This segment of the Big Wills Creek (Neely Henry Lake), containing the stormwater discharge, is classified as a Tier I stream and is on the most recent 303(d) list for Nutrient impairment. Nutrient monitoring is imposed in the reissuance so that sufficient information will be available regarding the nutrient contribution for the purpose of TMDL development. In addition based on DMR data, the stormwater discharges to Big Wills Creek (Neely Henry Lake) do not indicate significant nutrient levels in the stormwater discharges. The Storm Water Pollution Prevention (SWPP) Plan requires implementation of best management operation practices and a Best Management Practices (BMP) Plan. Also, since this reissuance does not include an expansion, an increase in nutrients in the discharge is not expected. There are no TMDLs affecting this discharge.

The permit language in Parts I.C.1.c and I.C.2.e has been updated to reflect the electronic discharge monitoring reporting and sanitary sewer overflow reporting requirements due to the transition to the Department's new Alabama Environmental Permitting and Compliance System (AEPACS) from the E2 Reporting System.

ADEM Administrative Rule 335-6-10-.12 requires applicants for new or expanded discharges to Tier II waters demonstrate that the proposed discharge is necessary for important economic or social development in the area in which the waters are located. The application submitted by the facility is not for a new or expanded discharge to a Tier II water body, so the applicant is not required to demonstrate that the discharge is necessary for economic and social development.

#### Revision: June 14, 2024

Vol. 49 No. 185 [September 20, 1984] of the Federal Register, page 36996, states "in the case of chemical addition for trickling filters, facility performance can be determined without considering the chemical addition because the Agency would not want to force continued use of chemical addition in light of its high operation costs and adverse impacts on sludge management." The Permittee properly displayed to the Department that chemical addition at the Gadsden West River Plant was used to maintain compliance. In this reissuance, the CBOD<sub>5</sub> % Removal has been lowered to 81% using the 90<sup>th</sup> Percentile of CBOD<sub>5</sub> % Removal Data prior to chemical addition. The decreased CBOD<sub>5</sub> % Removal limit is not backsliding since the decrease is based on new information that chemical is being added to achieve compliance and the revision is consistent with the Department's anti-degradation policy.

The required PFAS monitoring parameters for Outfall 001Q is being revised to include all the PFAS as specified in EPA Method 1633. In addition, a single sample max is required for all PFAS parameter testing. The description of the parameters for Outfall 001Q and Part IV.F of the permit has been updated from PFC to PFAS.

The Municipal Section, in consultation with the Department's Water Quality Branch, has conducted a narrative nutrient reasonable potential analysis. Based on a review of the facility's current levels of nutrients in the discharge and current assessments of the available information, the Permittee is required to monitor and report effluent test results for Total Kjeldahl Nitrogen (TKN), Nitrite plus Nitrate (NO<sub>2</sub>+NO<sub>3</sub>), and Total Phosphorus (TP). Monitoring for these nutrient-related parameters is imposed so that sufficient information will be available regarding the nutrient contribution from this point source, should it be necessary at some later time to impose additional nutrient limits on this discharge.

#### Revision: September 12, 2024

In this reissuance at the Permittee's request, the CBOD<sub>5</sub> % Removal has been lowered to 78% using the 95<sup>th</sup> Percentile of CBOD<sub>5</sub> % Removal Data prior to chemical addition. The decreased CBOD<sub>5</sub> % Removal limit is not backsliding since the decrease is based on new information that chemical is being added to achieve compliance and the revision is consistent with the Department's anti-degradation policy.

Revision: April 22, 2025

In this reissuance, to be consistent with other Permits requiring PFAS monitoring in Alabama, a footnote has been updated for Outfall 001Q requiring the use of EPA Method 1633 or alternative methods specifically approved by the Department.

Prepared by: Michael N. Simmons

**Gadsden West River WWTP (AL0053201)**  
Five Day Carbonaceous Biochemical Oxygen Demand (CBOD<sub>5</sub>) DMR Data with Gadsden Data

Monitor Period End Date	Location	Unit	Monthly Average (mg/L)	DMR Reported Limit	Gadsden Reported Monthly
11/30/2006	Influent	CBOD <sub>5</sub>	51.8	86.10%	86.19%
11/30/2006	Effluent	CBOD <sub>5</sub>	7.2		
12/31/2006	Influent	CBOD <sub>5</sub>	65.5	87.13%	87.13%
12/31/2006	Effluent	CBOD <sub>5</sub>	8.3		
1/31/2007	Influent	CBOD <sub>5</sub>	58.9	81.55%	81.55%
1/31/2007	Effluent	CBOD <sub>5</sub>	6.4		
2/28/2007	Influent	CBOD <sub>5</sub>	48.6	83.23%	83.23%
2/28/2007	Effluent	CBOD <sub>5</sub>	8.2		
3/31/2007	Influent	CBOD <sub>5</sub>	75.2	87.77%	87.77%
3/31/2007	Effluent	CBOD <sub>5</sub>	9.2		
4/30/2007	Influent	CBOD <sub>5</sub>	71.1	88.75%	88.80%
4/30/2007	Effluent	CBOD <sub>5</sub>	8.0		
5/31/2007	Influent	CBOD <sub>5</sub>	54.0	86.48%	86.50%
5/31/2007	Effluent	CBOD <sub>5</sub>	7.3		
6/30/2007	Influent	CBOD <sub>5</sub>	80.3	90.91%	90.90%
6/30/2007	Effluent	CBOD <sub>5</sub>	7.3		
7/31/2007	Influent	CBOD <sub>5</sub>	75.8	88.79%	88.70%
7/31/2007	Effluent	CBOD <sub>5</sub>	8.5		
8/31/2007	Influent	CBOD <sub>5</sub>	93.6	91.30%	91.30%
8/31/2007	Effluent	CBOD <sub>5</sub>	8.1		
9/30/2007	Influent	CBOD <sub>5</sub>	106.0	91.25%	91.30%
9/30/2007	Effluent	CBOD <sub>5</sub>	9.3		
10/31/2007	Influent	CBOD <sub>5</sub>	119.0	92.68%	92.70%
10/31/2007	Effluent	CBOD <sub>5</sub>	8.7		
11/30/2007	Influent	CBOD <sub>5</sub>	107.0	91.73%	91.80%
11/30/2007	Effluent	CBOD <sub>5</sub>	8.9		
12/31/2007	Influent	CBOD <sub>5</sub>	118.7	86.44%	86.50%
12/31/2007	Effluent	CBOD <sub>5</sub>	16.1		
1/31/2008	Influent	CBOD <sub>5</sub>			86.10%
1/31/2008	Effluent	CBOD <sub>5</sub>			
2/28/2008	Influent	CBOD <sub>5</sub>	54.7	77.33%	77.40%
2/28/2008	Effluent	CBOD <sub>5</sub>	12.4		
3/31/2008	Influent	CBOD <sub>5</sub>	59.8	83.61%	83.50%
3/31/2008	Effluent	CBOD <sub>5</sub>	9.8		
4/30/2008	Influent	CBOD <sub>5</sub>	61.3	86.44%	86.40%
4/30/2008	Effluent	CBOD <sub>5</sub>	8.3		
5/31/2008	Influent	CBOD <sub>5</sub>	76.4	89.66%	89.70%
5/31/2008	Effluent	CBOD <sub>5</sub>	7.9		
6/30/2008	Influent	CBOD <sub>5</sub>	85.2	88.28%	88.20%
6/30/2008	Effluent	CBOD <sub>5</sub>	10.0		
7/31/2008	Influent	CBOD <sub>5</sub>	95.8	92.89%	92.70%
7/31/2008	Effluent	CBOD <sub>5</sub>	7.0		
8/31/2008	Influent	CBOD <sub>5</sub>	81.2	91.82%	91.80%
8/31/2008	Effluent	CBOD <sub>5</sub>	6.6		
9/30/2008	Influent	CBOD <sub>5</sub>	73.0	91.90%	91.90%
9/30/2008	Effluent	CBOD <sub>5</sub>	5.9		
10/31/2008	Influent	CBOD <sub>5</sub>	76.3	92.01%	92.00%
10/31/2008	Effluent	CBOD <sub>5</sub>	6.1		
11/30/2008	Influent	CBOD <sub>5</sub>	101.3	89.44%	89.50%
11/30/2008	Effluent	CBOD <sub>5</sub>	10.7		
12/31/2008	Influent	CBOD <sub>5</sub>	59.1	81.73%	81.80%
12/31/2008	Effluent	CBOD <sub>5</sub>	10.8		
1/31/2009	Influent	CBOD <sub>5</sub>	33.0	71.82%	71.90%
1/31/2009	Effluent	CBOD <sub>5</sub>	9.3		
2/28/2009	Influent	CBOD <sub>5</sub>			81.30%
2/28/2009	Effluent	CBOD <sub>5</sub>			
3/31/2009	Influent	CBOD <sub>5</sub>	43.6	74.54%	74.60%
3/31/2009	Effluent	CBOD <sub>5</sub>	11.1		
4/30/2009	Influent	CBOD <sub>5</sub>	58.3	88.34%	88.30%
4/30/2009	Effluent	CBOD <sub>5</sub>	6.8		
5/31/2009	Influent	CBOD <sub>5</sub>	47.5	81.60%	81.60%
5/31/2009	Effluent	CBOD <sub>5</sub>	8.7		
6/30/2009	Influent	CBOD <sub>5</sub>			92.30%
6/30/2009	Effluent	CBOD <sub>5</sub>			
7/31/2009	Influent	CBOD <sub>5</sub>	89.2	89.74%	89.80%
7/31/2009	Effluent	CBOD <sub>5</sub>	7.1		
8/31/2009	Influent	CBOD <sub>5</sub>	79.9	91.11%	91.10%
8/31/2009	Effluent	CBOD <sub>5</sub>	7.1		
9/30/2009	Influent	CBOD <sub>5</sub>	60.6	89.44%	89.40%
9/30/2009	Effluent	CBOD <sub>5</sub>	6.4		
10/31/2009	Influent	CBOD <sub>5</sub>	45.9	83.44%	83.40%
10/31/2009	Effluent	CBOD <sub>5</sub>	7.6		
11/30/2009	Influent	CBOD <sub>5</sub>	52.5	86.29%	86.40%
11/30/2009	Effluent	CBOD <sub>5</sub>	7.2		
12/31/2009	Influent	CBOD <sub>5</sub>	46.5	82.37%	82.40%
12/31/2009	Effluent	CBOD <sub>5</sub>	8.2		
1/31/2010	Influent	CBOD <sub>5</sub>	537.0	98.18%	81.80%
1/31/2010	Effluent	CBOD <sub>5</sub>	9.8		
2/28/2010	Influent	CBOD <sub>5</sub>	60.3	80.93%	80.90%
2/28/2010	Effluent	CBOD <sub>5</sub>	11.5		
3/31/2010	Influent	CBOD <sub>5</sub>	87.1	85.42%	85.40%
3/31/2010	Effluent	CBOD <sub>5</sub>	12.7		
4/30/2010	Influent	CBOD <sub>5</sub>	70.3	87.00%	87.10%
4/30/2010	Effluent	CBOD <sub>5</sub>	9.1		
5/31/2010	Influent	CBOD <sub>5</sub>	64.0	86.54%	86.60%
5/31/2010	Effluent	CBOD <sub>5</sub>	8.6		
6/30/2010	Influent	CBOD <sub>5</sub>	85.0	91.41%	91.40%
6/30/2010	Effluent	CBOD <sub>5</sub>	7.3		
7/31/2010	Influent	CBOD <sub>5</sub>	82.0	88.05%	87.80%
7/31/2010	Effluent	CBOD <sub>5</sub>	9.8		
8/31/2010	Influent	CBOD <sub>5</sub>	62.5	87.04%	87.00%
8/31/2010	Effluent	CBOD <sub>5</sub>	8.1		
9/30/2010	Influent	CBOD <sub>5</sub>	67.8	90.86%	90.80%
9/30/2010	Effluent	CBOD <sub>5</sub>	6.2		
10/31/2010	Influent	CBOD <sub>5</sub>	67.4	83.68%	83.70%
10/31/2010	Effluent	CBOD <sub>5</sub>	11.0		
11/30/2010	Influent	CBOD <sub>5</sub>	61.1	85.76%	
11/30/2010	Effluent	CBOD <sub>5</sub>	8.7		
12/31/2010	Influent	CBOD <sub>5</sub>	61.1	85.76%	
12/31/2010	Effluent	CBOD <sub>5</sub>	8.7		
1/31/2011	Influent	CBOD <sub>5</sub>	58.4	81.34%	
1/31/2011	Effluent	CBOD <sub>5</sub>	10.9		
2/28/2011	Influent	CBOD <sub>5</sub>	58.4	81.34%	
2/28/2011	Effluent	CBOD <sub>5</sub>	10.9		
3/31/2011	Influent	CBOD <sub>5</sub>	40.8	87.99%	
3/31/2011	Effluent	CBOD <sub>5</sub>	4.9		
4/30/2011	Influent	CBOD <sub>5</sub>	41.8	86.60%	
4/30/2011	Effluent	CBOD <sub>5</sub>	5.6		

80th Percentile	81.30%	81.80%
95th Percentile	78.95%	79.00%



$Q_d * C_d + Q_{d2} * C_{d2} + Q_s * C_s = Q_t * C_t$						Enter Max Daily Discharge as reported by Applicant (C <sub>d</sub> ) Max	Enter Avg Daily Discharge as reported by Applicant (C <sub>d</sub> ) Avg	Partition Coefficient (Stream / Lake)
ID	Pollutant	Carcinogen Type	Type	Background from upstream source (C <sub>d</sub> ) Daily	Background from upstream source (C <sub>d</sub> ) Monthly Avg	Background from upstream source (C <sub>d</sub> ) Daily	Background from upstream source (C <sub>d</sub> ) Monthly Avg	
1	Antimony		Metals	0	0	0	0	-
2	Arsenic**	YES	Metals	0	0	0	0	0.574
3	Beryllium		Metals	0	0	0	0	-
4	Cadmium**		Metals	0	0	0	0	0.236
5	Chromium / Chromium III**		Metals	0	0	0	0	0.210
6	Chromium / Chromium VI**		Metals	0	0	0	0	-
7	Copper**		Metals	0	0	0	0	0.389
8	Lead**		Metals	0	0	0	0	0.206
9	Mercury**		Metals	0	0	0	0.00458	0.00194
10	Nickel**		Metals	0	0	0	0	0.505
11	Selenium		Metals	0	0	0	0	-
12	Silver		Metals	0	0	0	0	-
13	Thallium		Metals	0	0	0	0	-
14	Zinc**		Metals	0	0	0	0	0.330
15	Cyanide		Metals	0	0	0	0	-
16	Total Phenolic Compounds		Metals	0	0	0	0	-
17	Hardness (As CaCO <sub>3</sub> )		Metals	0	0	147000	87570	148000
18	Acrolein		VOC	0	0	0	0	-
19	Acrylonitrile	YES	VOC	0	0	0	0	-
20	Alkylbenzene	YES	VOC	0	0	0	0	-
21	Benzene	YES	VOC	0	0	0	0	-
22	Bromoform	YES	VOC	0	0	0	0	-
23	Carbon Tetrachloride	YES	VOC	0	0	0	0	-
24	Chloroform	YES	VOC	0	0	0	0	-
25	Chlorobenzene		VOC	0	0	0	0	-
26	Chlorodibromomethane	YES	VOC	0	0	0	0	-
27	Chloroethane		VOC	0	0	0	0	-
28	2-Chloro-Ethyl Vinyl Ether		VOC	0	0	0	0	-
29	Chloroform	YES	VOC	0	0	0	0	-
30	4,4'-DDD	YES	VOC	0	0	0	0	-
31	4,4'-DDE	YES	VOC	0	0	0	0	-
32	4,4'-DDT	YES	VOC	0	0	0	0	-
33	Dichlorodibromomethane	YES	VOC	0	0	0	0	-
34	1,1-Dichloroethane		VOC	0	0	0	0	-
35	1,2-Dichloroethane	YES	VOC	0	0	0	0	-
36	Trans-1,2-Dichloro-Ethylene		VOC	0	0	0	0	-
37	1,1-Dichloroethylene	YES	VOC	0	0	0	0	-
38	1,2-Dichloropropane		VOC	0	0	0	0	-
39	1,3-Dichloropropane		VOC	0	0	0	0	-
40	Dieldrin	YES	VOC	0	0	0	0	-
41	Ethylbenzene		VOC	0	0	0	0	-
42	Methyl Bromide		VOC	0	0	0	0	-
43	Methyl Chloride		VOC	0	0	0	0	-
44	Methylene Chloride	YES	VOC	0	0	0	0	-
45	1,1,1,2-Tetrachloro-Ethane	YES	VOC	0	0	0	0	-
46	Tetrachloro-Ethylene	YES	VOC	0	0	0	0	-
47	Toluene		VOC	0	0	0	0	-
48	Toxaphene	YES	VOC	0	0	0	0	-
49	Trifluoromethane	YES	VOC	0	0	0	0	-
50	1,1,1-Trichloroethane		VOC	0	0	0	0	-
51	1,1,2-Trichloroethane	YES	VOC	0	0	0	0	-
52	Trichloroethylene	YES	VOC	0	0	0	0	-
53	Vinyl Chloride	YES	VOC	0	0	0	0	-
54	p-Chloro-M-Cresol		Acids	0	0	0	0	-
55	2-Chlorophenol		Acids	0	0	0	0	-
56	2,4-Dichlorophenol		Acids	0	0	0	0	-
57	2,4-Dimethylphenol		Acids	0	0	0	0	-
58	4,6-Dinitro-O-Cresol		Acids	0	0	0	0	-
59	2,4-Dinitrophenol		Acids	0	0	0	0	-
60	4,6-Dinitro-2-methylphenol	YES	Acids	0	0	0	0	-
61	Dioxin (2,3,7,8-TCDD)	YES	Acids	0	0	0	0	-
62	2-Nitrophenol		Acids	0	0	0	0	-
63	4-Nitrophenol		Acids	0	0	0	0	-
64	Pentachlorophenol	YES	Acids	0	0	0	0	-
65	Phenol		Acids	0	0	0	0	-
66	2,4,6-Trichlorophenol	YES	Acids	0	0	0	0	-
67	Acenaphthene		Bases	0	0	0	0	-
68	Acenaphthylene		Bases	0	0	0	0	-
69	Anthracene		Bases	0	0	0	0	-
70	Benidine		Bases	0	0	0	0	-
71	Benzo(A)Anthracene	YES	Bases	0	0	0	0	-
72	Benzo(A)Pyrene	YES	Bases	0	0	0	0	-
73	3,4-Benzo-Fluoranthene		Bases	0	0	0	0	-
74	Benzo(GH)Fluoranthene		Bases	0	0	0	0	-
75	Benzo(K)Fluoranthene		Bases	0	0	0	0	-
76	Bis (2-Chloroethoxy) Methane		Bases	0	0	0	0	-
77	Bis (2-Chloroethyl) Ether	YES	Bases	0	0	0	0	-
78	Bis (2-Chloroisopropyl) Ether		Bases	0	0	0	0	-
79	Bis (2-Ethylhexyl) Phthalate	YES	Bases	0	0	0	0	-
80	4-Bromophenyl Phenyl Ether		Bases	0	0	0	0	-
81	Butyl Benzyl Phthalate		Bases	0	0	0	0	-
82	2-Chloronaphthalene		Bases	0	0	0	0	-
83	4-Chlorophenyl Phenyl Ether		Bases	0	0	0	0	-
84	Chrysene	YES	Bases	0	0	0	0	-
85	Di-N-Butyl Phthalate		Bases	0	0	0	0	-
86	Di-N-Octyl Phthalate		Bases	0	0	0	0	-
87	Dibenz(A,H)Anthracene	YES	Bases	0	0	0	0	-
88	1,2-Dichlorobenzene		Bases	0	0	0	0	-
89	1,3-Dichlorobenzene		Bases	0	0	0	0	-
90	1,4-Dichlorobenzene		Bases	0	0	0	0	-
91	3,3-Dichlorobenzidine	YES	Bases	0	0	0	0	-
92	Diethyl Phthalate		Bases	0	0	0	0	-
93	Dimethyl Phthalate		Bases	0	0	0	0	-
94	2,4-Dinitrobenzene	YES	Bases	0	0	0	0	-
95	2,6-Dinitrobenzene		Bases	0	0	0	0	-
96	1,2-Dihydrohydrazine		Bases	0	0	0	0	-
97	Endosulfan (alpha)	YES	Bases	0	0	0	0	-
98	Endosulfan (beta)	YES	Bases	0	0	0	0	-
99	Endosulfan sulfate	YES	Bases	0	0	0	0	-
100	Endrin	YES	Bases	0	0	0	0	-
101	Endrin Alkylthio	YES	Bases	0	0	0	0	-
102	Fluoranthene		Bases	0	0	0	0	-
103	Fluorene		Bases	0	0	0	0	-
104	Heptachlor	YES	Bases	0	0	0	0	-
105	Heptachlor Epoxide	YES	Bases	0	0	0	0	-
106	Hexachlorobenzene	YES	Bases	0	0	0	0	-
107	Hexachlorobutadiene	YES	Bases	0	0	0	0	-
108	Hexachlorocyclopentadiene (alpha)	YES	Bases	0	0	0	0	-
109	Hexachlorocyclopentadiene (beta)	YES	Bases	0	0	0	0	-
110	Hexachlorocyclopentadiene (gamma)	YES	Bases	0	0	0	0	-
111	Hexachlorocyclopentadiene		Bases	0	0	0	0	-
112	Hexachloroethane		Bases	0	0	0	0	-
113	Indene(1,2,3-CD)Pyrene	YES	Bases	0	0	0	0	-
114	Isophorone		Bases	0	0	0	0	-
115	Naphthalene		Bases	0	0	0	0	-
116	Nitrobenzene		Bases	0	0	0	0	-
117	N-Nitrosodimethylamine	YES	Bases	0	0	0	0	-
118	N-Nitrosodimethylamine	YES	Bases	0	0	0	0	-
119	N-Nitrosodimethylamine	YES	Bases	0	0	0	0	-
120	PCB-1016	YES	Bases	0	0	0	0	-
121	PCB-1221	YES	Bases	0	0	0	0	-
122	PCB-1222	YES	Bases	0	0	0	0	-
123	PCB-1223	YES	Bases	0	0	0	0	-
124	PCB-1224	YES	Bases	0	0	0	0	-
125	PCB-1254	YES	Bases	0	0	0	0	-
126	PCB-1260	YES	Bases	0	0	0	0	-
127	Phenanthrene		Bases	0	0	0	0	-
128	Pyrene		Bases	0	0	0	0	-
129	1,2,4-Trichlorobenzene		Bases	0	0	0	0	-

11.32	Enter Q <sub>d</sub> = wastewater discharge flow from facility (MGD)
17.5146323	Q <sub>d</sub> = wastewater discharge flow (cfs) (this value is calculated from the MGD)
0	Enter flow from upstream discharge Q <sub>d2</sub> = background stream flow in MGD above point of discharge
0	Q <sub>d2</sub> = background stream flow from upstream sources (cfs)
1122	Enter 7Q10, Q <sub>s</sub> = background stream flow in cfs above point of discharge
0.42	Enter or estimated, 1Q10, Q <sub>s</sub> = background stream flow in cfs above point of discharge (1Q10 estimated at 75% of 7Q10)
0.031	Enter Mean Annual Flow, Q <sub>s</sub> = background stream flow in cfs above point of discharge
1633	Enter 7Q2, Q <sub>s</sub> = background stream flow in cfs above point of discharge (For LWF class streams)
0	Enter C <sub>s</sub> = background in-stream pollutant concentration in µg/l (assuming this is zero "0" unless there is data)
Q <sub>d</sub> + Q <sub>d2</sub> + Q <sub>s</sub> = resultant in-stream flow, after discharge	
Calculated on other	
87.5	Enter, Background Hardness above point of discharge (assumed 50 South of Birmingham and 100 North of Birmingham)
7.00	Enter, Background pH above point of discharge
YES	Enter, Is discharge to a stream? "YES" Other option would be to a Lake. (This changes the partition coefficients for the metals)

\*\* Using Partition Coefficients

April 21, 2008

Facility Name: Gadsden West River WWTP NPDES No.: AL0002201																									Human Health Consumption Fish only (ug/l) Carcinogen C <sub>a</sub> = Annual Average Non-Carcinogen C <sub>c</sub> = 7Q10				
Freshwater FSW classification				Freshwater Acute (ug/l) C <sub>a</sub> = 1Q10										Freshwater Chronic (ug/l) C <sub>c</sub> = 7Q10															
ID	Pollutant	RP?	Carcinogen yes	Background from upstream source (C <sub>bg</sub> ) Daily Max	Max Daily Discharge as reported by Applicant (C <sub>max</sub> )	Water Quality Criteria Limit (C <sub>max</sub> )	Draft Permit Limit (C <sub>max</sub> )	20% of Draft Permit Limit	RP?	Background from upstream source (C <sub>bg</sub> ) Monthly Ave	Avg Daily Discharge as reported by Applicant (C <sub>avg</sub> )	Water Quality Criteria (C <sub>c</sub> )	Draft Permit Limit (C <sub>c</sub> )	20% of Draft Permit Limit	RP?	Water Quality Criteria (C <sub>c</sub> )	Draft Permit Limit (C <sub>c</sub> )	20% of Draft Permit Limit	RP?	Concentration yes	Background from upstream source (C <sub>bg</sub> ) Daily Max	Max Daily Discharge as reported by Applicant (C <sub>max</sub> )	Draft Permit Limit (C <sub>max</sub> )	20% of Draft Permit Limit	RP?				
1	Antimony			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
2	Arsenic		YES	0	1.2	-	20068.276	5613.655	No	0	0.8	-	17001.931	3400.366	No	3.03E-01	2.43E+04	1.20E+02	2.40E+01	No									
3	Beryllium			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
4	Cadmium			0	0	-	367.747	73.549	No	0	0	-	61.806	12.361	No	-	-	-		-	-	-	-	-	-	-	-		
5	Chromium/ Chromium III			0	2.8	-	118052.675	23670.535	No	0	2.3	-	20582.044	4116.889	No	-	-	-		-	-	-	-	-	-	-	-		
6	Chromium/ Chromium VI			0	2.8	-	786.185	157.037	No	0	2.3	-	715.686	143.134	No	-	-	-		-	-	-	-	-	-	-	-		
7	Copper			0	3.5	-	1498.826	299.765	No	0	3.3	-	1336.785	267.357	No	-	-	-		-	-	-	-	-	-	-	-		
8	Lead			0	1.6	-	13286.057	2656.819	No	0	1.3	-	687.073	137.415	No	-	-	-		-	-	-	-	-	-	-	-		
9	Mercury			0	0.00458	-	117.778	23.556	No	0	0.00194	-	0.781	0.156	No	4.24E-02	2.78E+00	5.52E-01	2.40E+01	No									
10	Nickel			0	4.2	-	40640.990	8128.198	No	0	3.4	-	5884.450	1186.890	No	9.93E+02	6.48E+04	1.29E+04	3.18E+04	No									
11	Selenium			0	0	-	851.482	168.298	No	0	0	-	325.304	65.061	No	-	-	-		-	-	-	-	-	-	-	-		
12	Silver			0	0	-	125.468	25.093	No	0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
13	Thallium			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
14	Zinc			0	34	-	15561.805	3112.339	No	0	25	-	20789.917	4159.983	No	1.49E+04	9.68E+05	1.94E+05	4.86E+04	No									
15	Cyanide			0	16.8	-	1079.630	215.928	No	0	5.3	-	338.316	67.663	No	6.07E+05	1.21E+05	3.02E+04	7.53E+03	No									
16	Total Phenolic Compounds			0	20.1	-	-	-		0	7	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
17	Hardness (As CaCO3)			0	148000	-	-	-		0	138000	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
18	Acrolein			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
19	Acrylonitrile	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
20	Aldrin	YES		0	0	-	147.222	29.444	No	0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
21	Benzene	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
22	Bromoforn	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
23	Carbon Tetrachloride	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
24	Chlordane	YES		0	0	-	117.778	23.556	No	0	0	-	0.280	0.056	No	1.89E-01	3.79E-02	9.47E-03	2.36E-03	No									
25	Chlorobenzene			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
26	Chlorodibromo-Methane	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
27	Chloroethane			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
28	2-Chloro-Ethylvinyl Ether			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
29	Chloroform	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
30	4,4' - DDD	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
31	4,4' - DDE	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
32	4,4' - DDT	YES		0	0	1,100	53.961	10.796	No	0	0	0.001	0.085	0.013	No	5.08E-02	1.02E-02	2.55E-03	6.35E-04	No									
33	Dichlorobromo-Methane	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
34	1,1-Dichloroethane			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
35	1,2-Dichloroethane	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
36	Trans-1,2-Dichloro-Ethylene			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
37	1,1-Dichloroethylene	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
38	1,2-Dichloroethylene			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
39	1,3-Dichloro-Propylene			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
40	Dieldrin	YES		0	0	-	11.778	2.356	No	0	0	-	3.643	0.729	No	1.24E-02	2.48E-03	6.20E-04	1.57E-04	No									
41	Ethylbenzene			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
42	Methyl Bromide			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
43	Methyl Chloride			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
44	Methylene Chloride	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
45	1,1,2,2-Tetrachloro-Ethane	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
46	Tetrachloro-Ethylene	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
47	Toluene			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
48	Toraphene	YES		0	0	-	36.824	7.185	No	0	0	-	0.013	0.003	No	5.98E-05	1.19E-05	2.99E-06	7.47E-07	No									
49	Tributyltin (TBT)	YES		0	0	-	22.574	4.515	No	0	0	-	4.684	0.937	No	6.42E-02	1.28E-02	3.20E-03	8.00E-04	No									
50	1,1,1-Trichloroethane			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
51	1,1,2-Trichloroethane	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
52	Trichloroethylene	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
53	Vinyl Chloride	YES		0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
54	p-Chloro-M-Cresol			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
55	2-Chlorophenol			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
56	2,4-Dichlorophenol			0	0	-	-	-		0	0	-	-	-		-	-	-		-	-	-	-	-	-	-	-		
57	2,4-Dimethylphenol			0	0	-	-	-		0	0	-																	

## TOXICITY AND DISINFECTION RATIONALE

Facility Name:	Gadsden West River WWTP	
NPDES Permit Number:	AL0053201	
Receiving Stream:	Coosa River (Neely Henry Lake)	
Facility Design Flow (Q <sub>w</sub> ):	11.320 MGD	
Receiving Stream 7Q <sub>10</sub> :	1122.000 cfs	
Receiving Stream 1Q <sub>10</sub> :	842.000 cfs	
Winter Headwater Flow (WHF):	1632.00 cfs	
Summer Temperature for CCC:	31 deg. Celsius	
Winter Temperature for CCC:	31 deg. Celsius	
Headwater Background NH <sub>3</sub> -N Level:	0.02 mg/l	
Receiving Stream pH:	7.9 s.u.	
Headwater Background FC Level (summer):	N/A.	(Only applicable for facilities with diffusers.)
(winter)	N/A.	

The Stream Dilution Ratio (SDR) is calculated using the 7Q<sub>10</sub> for all stream classifications.

$$\text{Stream Dilution Ratio (SDR)} = \frac{Q_w}{7Q_{10} + Q_w} = 1.54\%$$

### AMMONIA TOXICITY LIMITATIONS

Toxicity-based ammonia limits are calculated in accordance with the *Ammonia Toxicity Protocol* and the *General Guidance for Writing Water Quality Based Toxicity Permits*.

If the Limiting Dilution is less than 1%, the waterbody is considered stream-dominated and the CMC applies.

If the Limiting Dilution is greater than 1%, the waterbody is considered effluent-dominated and the CCC applies.

$$\begin{aligned} \text{Limiting Dilution} &= \frac{Q_w}{7Q_{10} + Q_w} \\ &= 1.54\% \quad \text{Effluent-Dominated, CCC Applies} \end{aligned}$$

Criterion Maximum Concentration (CMC):	CMC = $0.411 / (1 + 10^{(7.204 - \text{pH})}) + 58.4 / (1 + 10^{(\text{pH} - 7.204)})$
Criterion Continuous Concentration (CCC):	CCC = $[0.0577 / (1 + 10^{(7.688 - \text{pH})}) + 2.487 / (1 + 10^{(\text{pH} - 7.688)})] * \text{Min}[2.85, 1.45 * 10^{(0.028 * (25 - T))}]$

	<u>CMC</u>	<u>CCC</u>
Allowable Summer Instream NH <sub>3</sub> -N:	10.13 mg/l	0.97 mg/l
Allowable Winter Instream NH <sub>3</sub> -N:	10.13 mg/l	0.97 mg/l

$$\begin{aligned} \text{Summer NH}_3\text{-N Toxicity Limit} &= \frac{[(\text{Allowable Instream NH}_3\text{-N}) * (7Q_{10} + Q_w)] - [(\text{Headwater NH}_3\text{-N}) * (7Q_{10})]}{Q_w} \\ &= 61.4 \text{ mg/l NH}_3\text{-N at } 7Q_{10} \end{aligned}$$

$$\begin{aligned} \text{Winter NH}_3\text{-N Toxicity Limit} &= \frac{[(\text{Allowable Instream NH}_3\text{-N}) * (\text{WHF} + Q_w)] - [(\text{Headwater NH}_3\text{-N}) * (\text{WHF})]}{Q_w} \\ &= \text{N/A.} \end{aligned}$$

The ammonia limits established in the permit will be the lesser of the DO-based ammonia limit (from the wasteload allocation model) or the toxicity limits calculated above.

	<u>DO-based NH<sub>3</sub>-N limit</u>	<u>Toxicity-based NH<sub>3</sub>-N limit</u>
Summer	20.00 mg/l NH <sub>3</sub> -N	61.40 mg/l NH <sub>3</sub> -N
Winter	N/A.	N/A.

**Summer: The DO based limit of 20.00 mg/l NH<sub>3</sub>-N applies.**

**Winter limits are not applicable.**



## TOXICITY TESTING REQUIREMENTS (REFERENCE: MUNICIPAL BRANCH TOXICITY PERMITTING STRATEGY)

The following factors trigger toxicity testing requirements:

1. Facility design flow is equal to or greater than 1.0 MGD (major facility).
2. There are significant industrial contributors (SID permits).

Acute toxicity testing is specified for A&I receiving streams, or for stream dilution ratios of 1% or less.

Chronic toxicity testing is specified for all other situations requiring toxicity testing.

### **Chronic toxicity testing is required**

Instream Waste Concentration (IWC) = Based on Cormix Model = **9.80%** Note: This number will be rounded up for toxicity testing purposes.

## DISINFECTION REQUIREMENTS

Bacteria limits are required, and will be the water quality limit for the receiving stream, except where diffusers are used the limit may be adjusted for the dilution provided by the diffuser.

See the attached Disinfection Guidance for applicable stream standards.

**(Non-coastal limits apply)**

Applicable Stream Classification: **Fish & Wildlife**

Disinfection Type: **Chlorination**

Limit calculation method: **Limits based on meeting stream standards at the point of discharge.**

	<u>Stream Standard</u> (colonies/100ml)	<u>Effluent Limit</u> (colonies/100ml)
<b><u>E. Coli (applies to Non-coastal and Shellfish Harvesting Coastal)</u></b>		
Monthly limit as monthly average (November through April):	548	<b>548</b>
Monthly limit as monthly average (May through October):	126	<b>126</b>
Daily Max (November through April):	2507	<b>2507</b>
Daily Max (May through October):	298	<b>298</b>
<b><u>Enterococci (applies to Coastal)</u></b>		
Monthly limit as geometric mean (November through April):	Not applicable	<b>Not applicable</b>
Monthly limit as geometric mean (May through October):	Not applicable	<b>Not applicable</b>
Daily Max (November through April):	Not applicable	<b>Not applicable</b>
Daily Max (May through October):	Not applicable	<b>Not applicable</b>

## MAXIMUM ALLOWABLE CHLORINATION LIMITS

Toxicity-based chlorine limits are calculated in accordance with the General Guidance for Writing Water Quality Based Toxicity Permits.

Chlorine has been shown to be acutely toxic at 0.019 mg/l and chronically toxic at 0.011 mg/l.

Maximum allowable TRC in effluent:	0.716 mg/l (chronic)	(0.011)/(SDR)
Maximum allowable TRC in effluent:	1.236 mg/l (acute)	(0.019)/(SDR)

NOTE: A maximum chlorine limit will be imposed such that the instream concentration will not exceed acutely toxic concentrations in A & I streams and chronically toxic concentrations in all other streams, but may not exceed 1.0 mg/l.

Prepared By:

Michael Simmons

Date:

4/21/2025

# Waste Load Allocation Summary

Page 1

## REQUEST INFORMATION

Request Number: 3891

From:	Michael Simmons	In Branch/Section	Municipal
Date Submitted	7/20/2022	Date Required	8/19/2022
Date Permit application received by NPDES program		FUND Code	605
7/14/2022			
Receiving Waterbody	Coosa River (Neely Henry Lake)		
Previous Stream Name			
Facility Name	Gadsden West River WWTP	(Name of Discharger-WQ will use to file)	
		Previous Discharger Name	
River Basin	Coosa	Outfall Latitude	33.982890 (decimal degrees)
*County	Etowah	Outfall Longitude	-85.998360 (decimal degrees)
Permit Number	AL0053201	Permit Type	Permit Reissuance
		Permit Status	Active
		Type of Discharger	MUNICIPAL
Do other discharges exist that may impact the model?		<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

If yes, impacting dischargers names.	Gadsden East River WWTP Southside Water Works and Sewer Board Glencoe Lagoon Rainbow City Atalla WWT Lagoon APCO Gadsden Steam Plant Koch Foods of Gadsden, LLC	Impacting dischargers permit numbers.	AL0022659 AL0055867 AL0021334 AL0056839 AL0057657 AL0002887 AL0002119
--------------------------------------	---	---------------------------------------	---

Existing Discharge Design Flow	11.32	MGD	Note: The flow rates given should be those requested for modeling.
Proposed Discharge Design Flow	11.32	MGD	

Comments included	Information Verified By	SH	Year File Was Created	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			Response ID Number	1911
	Lat/Long Method	GPS/Aerial Imagery		

12 Digit HUC Code	031501060309	Date of Site Visit	8/8/2022
Use Classification	F&W	Date of WLA Response	2/3/2023
Site Visit Completed?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Approved TMDL?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Waterbody Impaired?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Approval Date of TMDL	10/28/2008
Antidegradation	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Waterbody Tier Level	Tier I		
Use Support Category	4A		

## Waste Load Allocation Information

Modeled Reach Length	78	Miles	Date of Allocation	12/20/2022
Name of Model Used	WASP		Allocation Type	Annual
Model Completed by	Shae Holley		Type of Model Used	Calibrated
Allocation Developed by	Water Quality Branch			

# Waste Load Allocation Summary

Page 2

		Conventional Parameters		Other Parameters	
		Qw	MGD	Qw	MGD
<b>Annual Effluent Limits</b>					
	Season			Season	Growing
	From			From	Apr
	Through			Through	Oct
Qw	11.32 MGD				
CBOD5	20 mg/l			TP	1 mg/l
NH3-N	20 mg/l			TN	
TKN	30 mg/L			TSS	
D.O.	3 mg/L				

## "Monitor Only" Parameters for Effluent:

Parameter	Frequency	Parameter	Frequency
NO2+NO3-N	Monthly		
TKN	Monthly		
TP	Monthly (Nov-Marc)		

## Water Quality Characteristics Immediately Upstream of Discharge

Parameter	Summer	Winter
CBODu	mg/l	mg/l
NH3-N	mg/l	mg/l
Temperature	°C	°C
pH	su	su

## Hydrology at Discharge Location

### Drainage Area Qualifier

Exact

Drainage Area	6180	sq mi
Stream 7Q16	1122	cfs
Stream 1Q10	842	cfs
Stream TQ2	1632	cfs
Annual Average	6931	cfs

### Method Used to Calculate

ADEM Estimate w/USGS Gage Data
ADEM Estimate w/USGS Gage Data
ADEM Estimate w/USGS Gage Data
ADEM Estimate w/USGS Gage Data

Comments  
and/or  
Notations



# Mixing Zone Analysis Summary

Page 1

## REQUEST INFORMATION

request number: 3891

From: (Responsible Engineer) Michael Simmons In Branch/Section Municipal  
Date Submitted 7/20/2022 Date Required 8/19/2022 FUND Code 605  
Date Permit application received by NPDES program 7/14/2022

Receiving Waterbody Coosa River (Neely Henry Lake)

Previous Stream Name

Facility Name Gadsden West River WWTP

(Name of Discharger-WQ will use to file)

Previous Discharger Name

River Basin Coosa

Outfall Latitude 33.982690

(decimal degrees)

\*County Etowah

Outfall Longitude -85.998360

(decimal degrees)

Permit Number AL0053201

Permit Type Permit Reissuance

Permit Status Active

Type of Discharger MUNICIPAL

Do other discharges exist that may impact the model?

☒ Yes ☐ No

### If yes, impacting dischargers names.

Gadsden East River WWTP  
Southside Water Works and Sewer Board  
Glencoe Lagoon  
Rainbow City  
Atalla WWT Lagoon  
APCO Gadsden Steam Plant  
Koch Foods of Gadsden, LLC

### Impacting dischargers permit numbers.

AL0022659  
AL0055867  
AL0021334  
AL0056839  
AL0057657  
AL0002887  
AL0002119

Existing Discharge Design Flow 11.32

MGD

Proposed Discharge Design Flow 11.32

MGD

Note: The flow rates given should be those requested for modeling.

Seasonal limits requested?

☐ Yes ☒ No

If not seasonal, only the summer sections will be used

### Comments included

☒ Yes ☐ NoInformation  
Verified By

SH

Year File Was Started

12 Digit HUC Code 031501060309

Use Classification F&amp;W

Site Visit Completed? ☒ Yes ☐ No

Date of MZ Response 2/3/2023

Date of Site Visit 8/8/2022

### Hydrology

Drainage Area 6180

sq mi

Stream 7Q10 1122

cfs

Stream 1Q10 842

cfs

Stream 7Q2 1632

cfs

Annual Average 6931

cfs

Date of MZ Analysis 2/3/2023

### Method Used to Calculate

ADEM Estimate w/USGS Gage Data

ADEM Estimate w/USGS Gage Data

ADEM Estimate w/USGS Gage Data

ADEM Estimate w/USGS Gage Data

Model Completed by

Shae Holley

### Pollutant Category

Whole Effluent Toxicity (WET) ☒Thermal ☐Pathogens ☐

# Mixing Zone Analysis Summary

Page 2

## WET Parameters

### Summer

#### Acute

Ambient Streamflow  cfs  
 ZID Length  Meters  
 ZID IWC  %

#### Chronic

Ambient Streamflow  1122 cfs  
 Mixing Zone Length  18.3 Meters  
 Mixing Zone IWC  9.8 %

### Winter

#### Acute

Ambient Streamflow  cfs  
 ZID Length  Meters  
 ZID IWC  %

#### Chronic

Ambient Streamflow  cfs  
 Mixing Zone Length  18.3 Meters  
 Mixing Zone IWC  %

## Thermal Parameters

### Summer

Ambient Streamflow  cfs  
 Mixing Zone Length  Meters  
 Max. Effluent Temp  °C

### Winter

Ambient Streamflow  cfs  
 Mixing Zone Length  Meters  
 Max. Effluent Temp  °C

## Pathogen Parameters

### Summer

Ambient Streamflow  cfs  
 ZID Length  Meters  
 Max. Effluent Fecal Conc  Cols/100 mls  
 Max. Effluent E. coli Conc  Cols/100 mls  
 Monthly Average Effluent E. coli Conc  Cols/100 mls  
 Max. Effluent Enterococci Conc (for coastal waters)  Cols/100 mls

### Winter

Ambient Streamflow  cfs  
 ZID Length  Meters  
 Max. Effluent Fecal Conc  Cols/100 mls  
 Max. Effluent E. coli Conc  Cols/100 mls  
 Monthly Average Effluent E. coli Conc  Cols/100 mls  
 Max. Effluent Enterococci Conc (for coastal waters)  Cols/100 mls

### Comments and/or Notations

Two dischargers (Attalla WWT Lagoon at 1.93 MGD and Gadsden West WWTP at 11.32 MGD) share the same diffuser. The IWC above was determined based on the total combined flow of 13.25 MGD. Rainbow City was removed from this combined outfall two years ago.



## Simmons, Michael N

---

**From:** Mike Lankford <mlankford@gadsdenwater.org>  
**Sent:** Thursday, July 25, 2024 4:29 PM  
**To:** Simmons, Michael N  
**Subject:** West River WWTP AL0053201 Draft Permit  
**Attachments:** Gadsden\_West\_River\_WWTP\_Draft\_Permit\_Rationale\_Discussion\_06242024\_ADEM.pdf; Permit Writers Manual.pdf; Pre\_Alum\_Feed\_Nov\_2006-Dec\_2010\_West\_River\_WWTP\_07172024.pdf

Mr. Simmons,

Please find attached response for the Gadsden West River WWTP (AL0053201) Draft Permit. If we can provide anything further, please let us know.

Thank you for your time, attention, and consideration.

Be Blessed,

*Mike Lankford*, Assistant General Manager/Superintendent of Environmental Services

The Water Works & Sewer Board of the City of Gadsden, AL

515 Albert Rains Blvd.

P. O. Box 800

Gadsden, AL. 35901

(W) (256) 543-2884 ext. 223

(F) (256) 543-7704

[www.gadsdenwater.org](http://www.gadsdenwater.org)



Virus-free [www.avg.com](http://www.avg.com)



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JUL 20 2024

MUNICIPAL SECTION

Mr. Michael Simmons, Municipal Section, Water Division  
Alabama Department of Environmental Management  
1400 Coliseum Blvd.  
Montgomery, AL 36110-2400

July 17, 2024

**RE: Gadsden West River WWTP (AL0053201) Draft Permit**

Dear Mr. Simmons,

Thank you for your hard work in preparing the draft permit for the Gadsden West River WWTP (AL0053201), and for allowing a time for evaluation and comment.

We would like to thank you for the evaluation and consideration, which led to the conclusion to reduce the CBOD<sub>5</sub> removal percentage from 85% to 81%, which we understand is based on the 90<sup>th</sup> percentile prior to alum treatment for phosphorus sequestering.

The data presented and utilized in this decision making process indicates that five (5) times out of the 35 sampling events, the Gadsden West River WWTP was at or below the 81% removal percentage, which could mean exceedance of the recommended standard over 14% of the time.

Also, looking at the data utilized in this determination, the period used seems to include November and December of 2006, then from June 2008 – April 2011. As for the data used, the 90<sup>th</sup> percentile is correctly computed to be 81%. When evaluating the pre-alum feed data from November 2006, when the West Plant began testing for CBOD<sub>5</sub> in lieu of BOD<sub>5</sub>, through December 2010, which would give five (5) years of data, the computed 90<sup>th</sup> percentile for that entire period of non-alum supplemented removal percentage is, again, 81%. However, when looking at the non-growing season for the same time period, the part of the year when alum feed could be halted, or at least greatly reduced, the non-alum supplemented removal percentage is only 80%, 79.9% to be exact (all applicable data attached).

In The EPA Permit Writers' Manual 2010, Chapter 5, page 5-20, reads, "EPA generally uses statistical procedures to determine the values of the limitations specified in the effluent guidelines. Those procedures involve fitting effluent data to distributions and using estimated upper percentiles of the distributions. EPA defines the maximum daily limitation as an estimate of the 99th percentile of the distribution of the daily measurements. The average monthly limitation is an estimate of the 95th percentile of the distribution of the monthly averages of the daily measurements." (attached, with section highlighted)

With that reference in mind, and with secondary standards being technology-based, it seems reasonable to assume that percent removal should be calculated using the average monthly limit estimate of 95%. If that were the case, the year-round average, based on the pre-alum feed period used for evaluation, would be calculated at 79%, with the non-growing season being calculated at 77%, 76.6% to be exact.

Finally, as stated on the third page of the rationale attached to the Draft Permit, referencing Vol. 49 No. 185 [September 20, 1984] of the Federal Register, page 36996, "in the case of chlorine addition for trickling filters, facility performance can be determined without considering the chemical addition because the Agency would not want to force continued use of chemical addition in light of its high operation costs and adverse impacts on sludge management." At 81%, the

90<sup>th</sup> percentile, where the possibility exists that the Gadsden West River WWTP (AL0053201) could possibly exceed this requirement over 14% of the time, will require the addition of alum year-round to try and ensure compliance.

In light of the data presented, and with the Permit Writer's Manual indicating that secondary standards should be calculated using the average monthly limit estimate of 95%, we respectfully request Gadsden West River WWTP's CBOD5 calculated monthly percent removal be adjusted to 78% year-round.

Thank you, again, for your diligence and understanding. Any additional consideration in the matter will be greatly appreciated, as we continue to strive to provide the best service possible to our customers, our community, and our environment.

Sincerely,



Mike Lankford, Gadsden Water

◁b!!◁d#f!!♦◁g!!◁g!!√▷g!!+▷e!!≤▷b!!≡\_!!◁n▷Z!!◁n▷T!!◁n▷N!!≡▷I!!≤▷F!!≈▷B!!√▷A!!◁A!!♣◁A!!

◁B!!

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## All Data

Nov-06	86.19
Dec-06	87.33
Jan-07	83.5
Feb-07	83.2
Mar-07	87.7
Apr-07	88.8
May-07	86.5
Jun-07	90.9
Jul-07	88.7
Aug-07	91.3
Sep-07	91.3
Oct-07	92.7
Nov-07	91.8
Dec-07	86.5
Jan-08	86.1
Feb-08	77.4
Mar-08	83.5
Apr-08	86.4
May-08	89.7
Jun-08	88.2
Jul-08	92.7
Aug-08	91.8
Sep-08	91.9
Oct-08	92.0
Nov-08	89.5
Dec-08	81.8
Jan-09	71.9
Feb-09	81.3
Mar-09	74.6
Apr-09	88.3
May-09	81.6
Jun-09	92.3
Jul-09	89.8
Aug-09	91.1
Sep-09	89.4
Oct-09	83.4
Nov-09	86.4
Dec-09	82.4
Jan-10	81.8
Feb-10	80.9
Mar-10	85.4
Apr-10	87.1
May-10	86.6
Jun-10	91.4

## Growing Season

Mar-07	87.7
Apr-07	88.8
May-07	86.5
Jun-07	90.9
Jul-07	88.7
Aug-07	91.3
Sep-07	91.3
Oct-07	92.7
Mar-08	83.5
Apr-08	86.4
May-08	89.7
Jun-08	88.2
Jul-08	92.7
Aug-08	91.8
Sep-08	91.9
Oct-08	92.0
Mar-09	74.6
Apr-09	88.3
May-09	81.6
Jun-09	92.3
Jul-09	89.8
Aug-09	91.1
Sep-09	89.4
Oct-09	83.4
Mar-10	85.4
Apr-10	87.1
May-10	86.6
Jun-10	91.4
Jul-10	87.8
Aug-10	87
Sep-10	90.8
Oct-10	83.7

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Jul-10	87.8
Aug-10	87
Sep-10	90.8
Oct-10	83.7
Nov-10	85.8
Dec-10	84.2

90th Percentile
95th Percentile

81.6
79.0

90th Percentile
95th Percentile

83.5
82.6

Non-Growing Season

Nov-06	86.19
Dec-06	87.33
Jan-07	83.5
Feb-07	83.2
Nov-07	91.8
Dec-07	86.5
Jan-08	86.1
Feb-08	77.4
Nov-08	89.5
Dec-08	81.8
Jan-09	71.9
Feb-09	81.3
Nov-09	86.4
Dec-09	82.4
Jan-10	81.8
Feb-10	80.9
Nov-10	85.8
Dec-10	84.2

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MUNICIPAL GOVERNMENT

90th Percentile	79.9
95th Percentile	76.6





3308 Bernice Avenue  
Russellville, AR 72802  
PO Box 3036 • Russellville, AR 72811  
Phone: 479-498-0500

February 3, 2022

Mr. Mike Lankford  
Assistant General Manager/Superintendent of Environmental Services  
The Water Works & Sewer Board of the City of Gadsden, AL  
515 Albert Rains Blvd.  
P.O. Box 800  
Gadsden, AL 35901

RECEIVED  
JUL 14 2022  
MUNICIPAL SECTION

Re: 2021 USEPA Annual Reporting, West River WWTP – Mandatory Information

Dear Mr. Lankford:

Enclosed is the above referenced report, which covers land application operations conducted by Denali Water Solutions.

To finalize the report, you will need to do the following:

1. Review the report to ensure it is complete and accurate. Please note that if you have done additional analysis or land application activity during the 2021 calendar year, you will need to supplement the report with the necessary information.
2. Sign and date the enclosed pathogen reduction and vector attraction certification statement.
3. Keep a copy of the report for your records and eFile by February 19, 2022 using the NPDES eReporting Tool (NeT), which is accessed via EPA's Central Data Exchange (CDX) located at <https://cdx.epa.gov>.

Also enclosed are Denali Water's land applier Certification Statements for 2021. These certifications are for your files and do not need to be submitted to the USEPA.

If you have any questions or require any additional information, please contact me at 256-503-4300.

Sincerely,

A handwritten signature in black ink that reads "Jeff Retzke". The signature is written in a cursive, flowing style.

Jeff Retzke  
Senior Environmental Manager, East Region

West River WWTP  
Gadsden, Etowah County, Alabama

U.S. EPA Region 7  
2021 Annual Report

NPDES Permit No. AL0053201

# 2021 Annual Report

Facility Physical Address: West River WWTP  
2000 Wills Creek Road  
Gadsden, Etowah County, AL 35902  
256-543-2884

NPDES Permit No.: AL0053201

Responsible Official: Mr. Mike Lankford  
Assistant General Manager  
The Water Works & Sewer Board  
515 Albert Rains Blvd.  
P.O. Box 800  
Gadsden, AL 35901  
256-543-2884 ext 223  
mlankford@gadsdenwater.org

Land Applier: Denali Water Solutions  
3308 Bernice Avenue  
Russellville, AR 72802  
479-498-0500

Dry Metric Tons of Biosolids Used or Disposed:

Land Applied:	<u>481.78</u>
Landfilled:	<u>0</u>

Metal and Pathogen Reduction  
Analysis : See Attached.

Description of Pathogen Reduction  
Alternative and Vector Attraction  
Reduction Option: See Attached Certification Statement.

Vector Attraction Reduction Data: See Attached.

Field Loadings: See Attached.

# Metal and Pathogen Reduction Analysis



## TEST RESULTS

Tina Hudson  
Recyc SystemsProject: Sludge  
Project Number:  
Sample Location:  
Sampled By: Client  
Date/Time Collected: 1/5/21 10:30Lab Number: 2100132  
Sample Type: Sludge  
Date/Time Received: 1/6/21 13:00  
Date Reported: 2/10/2021

Sample No.	Client No.	Parameter	Result	Qual	Units	Report Limit	Date/Time	Method	Analys
001	1 West Ga	Arsenic, Total	3.89		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Cadmium, Total	3.53		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Chromium, Total	57.3		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Copper, Total	233		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Mercury, Total	0.404		mg/kg dr	0.025	1/14/21 15:19	7471A (3)	WCC
001	1 West Ga	Molybdenum, Total	14.5		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Nickel, Total	20.6		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Lead, Total	140		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Selenium, Total	4.16		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Zinc, Total	1,290		mg/kg dr	0.25	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Potassium, Total	800		mg/kg dr	1	1/12/21 11:09	6010B (3)	FLY
001	1 West Ga	Phosphorus, Total	25,200		mg/kg dr	0.025	1/12/21 11:09	6010B (3)	FLY
002	2 West Ga	Ammonia-N	3,020		mg/kg dr	0.1	1/7/21 6:15	4500NH3-B,	RAC
002	2 West Ga	Nitrate as N	<1.00		mg/kg dr	1	1/7/21 9:34	300.0 (1)	LW
002	2 West Ga	Total Kjeldahl Nitrogen	22,500		mg/kg dr	1.5	1/7/21 6:15	4500Norg-C	RAC
002	2 West Ga	Solids, Total	33.1		%		1/6/21 15:00	2540G (2)	RAC
003	3 West Ga	Fecal Coliform Sludge	1060		MPN/g d	10	1/7/21 6:00	9221E (2)	RAC
004	4 West Ga	Fecal Coliform Sludge	1970		MPN/g d	10	1/7/21 6:00	9221E (2)	RAC
005	5 West Ga	Fecal Coliform Sludge	6360		MPN/g d	10	1/7/21 6:00	9221E (2)	RAC
006	6 West Ga	Fecal Coliform Sludge	43400		MPN/g d	10	1/7/21 6:00	9221E (2)	RAC

## ~METHOD REFERENCES~

- (1) Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020.
- (2) Standard Methods for the Examination of Water and Waste Water.
- (3) Test Methods for Evaluating Solid Wastes Physical Chemical Method SW-846.
- (4) HACH Handbook of Water Analysis, HACH Chemical Company.
- (5) Methods for the Determination of Organic Compounds in Drinking Water, EPA-600/4-88/039.



# SOUTHERN ENVIRONMENTAL TESTING

P.O. Box 487  
3103 Northington Court  
Florence, Alabama 35630

(256) 740-5532  
Fax (256) 740-5529

## TEST RESULTS

Tina Hudson  
Recyc Systems

Project: Sludge  
Project Number:  
Sample Location:  
Sampled By: Client  
Date/Time Collected: 1/5/21 10:30

Lab Number: 2100132  
Sample Type: Sludge  
Date/Time Received: 1/6/21 13:00  
Date Reported: 2/10/2021

Sample No.	Client No.	Parameter	Result	Qual	Units	Report Limit	Date/Time	Method	Analys
------------	------------	-----------	--------	------	-------	--------------	-----------	--------	--------

Revised Report 2/10/2021

Report Approved By:

Allison Dixon

### ~METHOD REFERENCES~

- (1) Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020.
- (2) Standard Methods for the Examination of Water and Waste Water.
- (3) Test Methods for Evaluating Solid Wastes Physical Chemical Method SW-846.
- (4) HACH Handbook of Water Analysis, HACH Chemical Company.
- (5) Methods for the Determination of Organic Compounds in Drinking Water, EPA-600/4-88/039.





SOUTHERN ENVIRONMENTAL TESTING

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD  
2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603  
3103 NORTHINGTON COURT, FLORENCE, AL 35630

PAGE 1 of 1

Sludge

(256) 350-0846 www.setesting.com

COMPANY/CLIENT NAME Recyc Systems		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		REQUESTED ANALYSES									
CLIENT POINT OF CONTACT Ricky Turner		CLIENT PHYSICAL ADDRESS		CITY/STATE/ZIP		SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PT	TKN	KICP	VS - BELFORE	VS - AFTER
CLIENT EMAIL recyclc2@bellsouth.net		PHONE NUMBER 256-738-0125		OTHER INFORMATION											
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)											
SET LAB NUMBER	SAMPLE DESCRIPTION			SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP								
2100132-01	1 West Vadsden			1-5-21	10:30	X			X				X		
-02	2 " "					X			X	X	X	X	X		
-03	3 " "					X		X							
-04	4 " "					X		X							
-05	5 " "					X		X							
-06	6 " "					X		X							
Comments:															
Collector to complete shaded areas, as applicable															
SAMPLE TEMPERATURE RECEIVED @ _____															
COMPOSITE SAMPLER INFO		FIELD INFORMATION								Qty	Type - Cool 6c		pH	Parameters	
		SM 4500H+B		SM 4500-CI D		SM 4500-O G		SM 2550B							
Start Date		pH su		TRC mg/l		DO mg/l		Temp deg C							
Start Time		Date		Adj pH 3.5 - 4.5		Date		Date							
Stop Date		Time		Date		Time		Time							
Stop Time		Analyst		Time		Analyst		Analyst							
				Analyst											
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME
<i>[Signature]</i>		1-6-21	1030	<i>[Signature]</i>		1-5-21	1:00	<i>[Signature]</i>		11/6/21	1430	<i>[Signature]</i>		11/6/21	1430
RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME
<i>[Signature]</i>		1-5-21	10:30	<i>[Signature]</i>		11/6/21	1300	<i>[Signature]</i>		1-6-21	1430	<i>[Signature]</i>		1-6-21	1430
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)		DATE	TIME	RECEIVED FOR LABORATORY USE BY: (SIGNATURE)		DATE	TIME	RECEIVED FOR LABORATORY USE BY: (SIGNATURE)		DATE	TIME	RECEIVED FOR LABORATORY USE BY: (SIGNATURE)		DATE	TIME
<i>[Signature]</i>		11/6/21	1515	<i>[Signature]</i>		11/6/21	1515	<i>[Signature]</i>		1-6-21	1515	<i>[Signature]</i>		1-6-21	1515
SAMPLE STATUS: <input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception															



# SOUTHERN ENVIRONMENTAL TESTING

P.O. Box 487  
3103 Northington Court  
Florence, Alabama 35630

(256) 740-5532  
Fax (256) 740-5529

## TEST RESULTS

Tina Hudson  
Recyc Systems

Project: Sludge FC

Project Number:

Sample Location:

Sampled By: Client

Date/Time Collected: 1/11/21 10:30

Lab Number: 2100242

Sample Type: Sludge

Date/Time Received: 1/11/21 14:00

Date Reported: 1/18/2021

Sample No.	Client No.	Parameter	Result	Qual	Units	Report Limit	Date/Time	Method	Analys
001	#1 East Ga	Fecal Coliform Sludge	3120		MPN/g	1310	1/12/21 5:00	9221E (2)	RAC
002	#2 East Ga	Fecal Coliform Sludge	3150		MPN/g	1310	1/12/21 5:00	9221E (2)	RAC
003	#3 East Ga	Fecal Coliform Sludge	3110		MPN/g	10	1/12/21 5:00	9221E (2)	RAC
004	#4 West G	Fecal Coliform Sludge	8020		MPN/g	10	1/12/21 5:00	9221E (2)	RAC
005	#5 West G	Fecal Coliform Sludge	2780		MPN/g	10	1/12/21 5:00	9221E (2)	RAC
006	#6 West G	Fecal Coliform Sludge	35600		MPN/g	1620	1/12/21 5:00	9221E (2)	RAC

Report Approved By:

Allison Dixon

### ~METHOD REFERENCES~

- (1) Methods for Chemical Analysis of Water and Wastes, EPA-600/4-79-020.
- (2) Standard Methods for the Examination of Water and Waste Water
- (3) Test Methods for Evaluating Solid Wastes Physical Chemical Method SW-846
- (4) HACH Handbook of Water Analysis, HACH Chemical Company
- (5) Methods for the Determination of Organic Compounds in Drinking Water, EPA-600/4-88/039.





SOUTHERN ENVIRONMENTAL TESTING

**ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD**  
**2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603**  
**3103 NORTHINGTON COURT, FLORENCE, AL 35630**

PAGE 1 of 1

Sludge

(256) 350-0846 www.setesting.com

COMPANY/CLIENT NAME Recyc Systems		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		<b>REQUESTED ANALYSES</b>											
CLIENT POINT OF CONTACT Ricky Turner		CLIENT PHYSICAL ADDRESS		CITY/STATE/ZIP													
CLIENT EMAIL recyclc2@bellsouth.net		PHONE NUMBER 256-738-0125		OTHER INFORMATION		SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PT	TKN	KICP	VS - BELFORE	VS - AFTER		
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)													
SET LAB NUMBER	SAMPLE DESCRIPTION	SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP												
2100242-01	#1 East Gadsden	1-11-21	10:30	X		X											
-02	#2 " "	"		X		X											
-03	#3 " "	"		X		X											
-04	#4 West Gadsden	"	11:00	X		X											
-05	5 " "	"	"	X		X											
-06	6 " "	"	"	X		X											
<div style="display: flex; justify-content: space-between;"> <div> <b>Comments:</b>   Collector to complete shaded areas, as applicable </div> <div> <b>SAMPLE TEMPERATURE</b>  RECEIVED @ _____ </div> </div>																	
<b>COMPOSITE SAMPLER INFO</b>		<b>FIELD INFORMATION</b>								Qty	Type - Cool 6c	pH	Parameters				
		SM 4500H+B		SM 4500-CI D		SM 4500-O G		SM 2550B									
Start Date	pH su	TRC mg/l	DO mg/l	Temp deg C													
Start Time	Date	Adj pH 3.5 - 4.5	Date	Date													
Stop Date	Time	Date	Time	Time													
Stop Time	Analyst	Time	Analyst	Analyst													
		Analyst															
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME						
		1-11-21	10:30			1-11-21	2:00										
RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME						
		1-11-21	10:30			1-11-21	2:00										
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)				DATE	TIME	SAMPLE STATUS:											
				1/11/21	1400	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception											



April 27, 2021

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
DB01910-01	#7 West Gadsden	04/19/2021	04/19/2021
DB01910-02	#8 West Gadsden	04/19/2021	04/19/2021
DB01910-03	#9 West Gadsden	04/19/2021	04/19/2021
DB01910-04	#10 West Gadsden	04/19/2021	04/19/2021
DB01910-05	#11 West Gadsden	04/19/2021	04/19/2021
DB01910-06	#12 West Gadsden	04/19/2021	04/19/2021

This cover page and the attached chain-of-custody record(s) are integral parts of your report. Southern Environmental Testing considers this report your official record. This information shall remain in Southern Environmental Testing's active database for a period of one (1) calendar year before archiving. Any replacement of this information after archiving may result in an administrative fee to cover the cost of retrieval.

If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Margaret Aiken  
Project Manager

3103 Northington Court  
Florence, AL 35630  
(256) 740-5532

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2919 Fairgrounds Road SW  
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(256) 280-2567

PO Box 2084  
Decatur, AL 35602  
(256) 350-0686 Fax





## SAMPLE RESULTS REPORT

Report Date/Time: 04/27/2021 08:24

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

*This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.*

Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

Sample Point: #7 West Gadsden

Sample ID: DB01910-01

Collected: 04/19/2021

Submitted: 04/19/2021

## Inorganics

Fecal Coliform

&lt;1500 mpn/g dry wt.

Total Solids

23.9 %

Sample Point: #8 West Gadsden

Sample ID: DB01910-02

Collected: 04/19/2021

Submitted: 04/19/2021

## Inorganics

Fecal Coliform

&lt;1490 mpn/g dry wt.

Total Solids

24.0 %

Sample Point: #9 West Gadsden

Sample ID: DB01910-03

Collected: 04/19/2021

Submitted: 04/19/2021

## Inorganics

Fecal Coliform

&lt;890 mpn/g dry wt.

Total Solids

25.1 %

Sample Point: #10 West Gadsden

Sample ID: DB01910-04

Collected: 04/19/2021

Submitted: 04/19/2021

## Inorganics

Fecal Coliform

&lt;1480 mpn/g dry wt.

Total Solids

24.3 %

Sample Point: #11 West Gadsden

Sample ID: DB01910-05

Collected: 04/19/2021

Submitted: 04/19/2021

## Anions by IC

Nitrate-Nitrogen

&lt;0.855 mg/kg dry

## Inorganics

Ammonia-Nitrogen

3770 mg/kg dry

Total Kjeldahl Nitrogen

20400 mg/kg dry

Total Solids

23.4 %

Sample Point: #12 West Gadsden

Sample ID: DB01910-06

Collected: 04/19/2021

Submitted: 04/19/2021

## Inorganics

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*The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document. Results are only representative of the sample(s) received and information supplied by the client may affect the validity of results. No duplication of this report is allowed, except in its entirety.*



## SAMPLE RESULTS REPORT

Report Date/Time: 04/27/2021 08:24

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

Sample Point: #12 West Gadsden

Sample ID: DB01910-06

Collected: 04/19/2021

Submitted: 04/19/2021

## Inorganics (Continued)

Total Solids	23.4	%
--------------	------	---

## Metals by ICP-OES

Total Arsenic	6.09	mg/kg dry
Total Cadmium	2.93	mg/kg dry
Total Chromium	61.0	mg/kg dry
Total Copper	270	mg/kg dry
Total Potassium	965	mg/kg dry
Total Molybdenum	16.9	mg/kg dry
Total Nickel	27.3	mg/kg dry
Total Phosphorus	24700	mg/kg dry
Total Lead	177	mg/kg dry
Total Selenium	5.92	mg/kg dry
Total Zinc	1450	mg/kg dry

## Miscellaneous Metals

Total Mercury	0.831	mg/kg dry
---------------	-------	-----------

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## SAMPLE RESULTS REPORT

Report Date/Time: 04/27/2021 08:24

REPORT TO
<b>Jeff Retzke</b> <b>Denali Water</b> <b>35 Refreshment Place</b> <b>Decatur, AL 35601</b>

*This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.*

All calculations are performed prior to rounding per EPA and *Standard Methods* requirements. Calibration data for field analyses conducted by SET or *ENERSOLV* personnel are available upon request.

### Data Qualifiers

< Less than reporting limit

#### Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB01910-01	Total Solids	SM 2540 G-2011	SH	Decatur	04/19/2021 11:30	04/19/2021 14:08	
DB01910-01	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/19/2021 11:30	04/20/2021 06:00	04/21/2021 07:45
DB01910-02	Total Solids	SM 2540 G-2011	SH	Decatur	04/19/2021 11:30	04/19/2021 14:08	
DB01910-02	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/19/2021 11:30	04/20/2021 06:00	04/21/2021 07:45
DB01910-03	Total Solids	SM 2540 G-2011	SH	Decatur	04/19/2021 11:30	04/19/2021 14:08	
DB01910-03	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/19/2021 11:30	04/20/2021 06:00	04/21/2021 07:45
DB01910-04	Total Solids	SM 2540 G-2011	SH	Decatur	04/19/2021 11:30	04/19/2021 14:08	
DB01910-04	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/19/2021 11:30	04/20/2021 06:00	04/21/2021 07:45
DB01910-05	Nitrate-Nitrogen	9056A/300.0	AGD	Decatur	04/19/2021 11:30	04/20/2021 12:55	
DB01910-05	Total Solids	SM 2540 G-2011	DRK	Decatur	04/19/2021 11:30	04/21/2021 14:05	
DB01910-05	Ammonia-Nitrogen	SM 4500 NH3 C-2011	WCC	Decatur	04/19/2021 11:30	04/22/2021 09:05	
DB01910-05	Total Kjeldahl Nitrogen	SM 4500-N ORG-C-2011	WCC	Decatur	04/19/2021 11:30	04/22/2021 08:25	

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 (256) 280-2567

PO Box 2084  
 Decatur, AL 35602  
 (256) 350-0686 Fax

*The contents of this report apply to the sample(s) analyzed in accordance with the chain of custody document. Results are only representative of the sample(s) received and information supplied by the client may affect the validity of results. No duplication of this report is allowed, except in its entirety.*





## SAMPLE RESULTS REPORT

Report Date/Time: 04/27/2021 08:24

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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## Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB01910-06	Arsenic	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Cadmium	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Chromium	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Copper	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Lead	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Molybdenum	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Nickel	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Phosphorus	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Potassium	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Selenium	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Zinc	EPA 6010C	FLY	Florence	04/19/2021 11:30	04/22/2021 09:25	
DB01910-06	Total Mercury	EPA 7471B	WCC	Florence	04/19/2021 11:30	04/21/2021 08:55	
DB01910-06	Total Solids	SM 2540 G-2011	DRK	Decatur	04/19/2021 11:30	04/21/2021 14:05	

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Florence, AL 35630  
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SOUTHERN ENVIRONMENTAL TESTING

ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD  
2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603  
3103 NORTHINGTON COURT, FLORENCE, AL 35630

PAGE 1 of 1

Sludge

(256) 350-0846 www.setesting.com

COMPANY/CLIENT NAME <b>Recyc Systems</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		REQUESTED ANALYSES									
CLIENT POINT OF CONTACT <b>Ricky Turner</b>		CLIENT PHYSICAL ADDRESS		CITY/STATE/ZIP		SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PT	TKN	KICP	VS - BELFORE	VS - AFTER
CLIENT EMAIL <b>recycllc2@bellsouth.net</b>		PHONE NUMBER <b>256-738-0125</b>		OTHER INFORMATION											
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)											
SET LAB NUMBER	SAMPLE DESCRIPTION			SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP								
DB01910-01	#7 West Bradstreet			4-19-21	11:30	X		X							
-02	8 "			"	"	X		X							
-03	9 "			"	"	X		X							
-04	10 "			"	"	X		X							
-05	11 "			"	"	X			X	X	X	X	X		
-06	12 "			"	"	X		X							

Comments:

Collector to complete shaded areas, as applicable

SAMPLE TEMPERATURE

RECEIVED @ \_\_\_\_\_

COMPOSITE SAMPLER INFO		FIELD INFORMATION								Qty	Type - Cool 6c	pH	Parameters
		SM 4500H+B		SM 4500-CI D		SM 4500-O G		SM 2550B					
Start Date		pH		TRC		DO		Temp					
Start Time		su		mg/l		mg/l		deg C					
Stop Date		Date		Adj pH		Date		Date					
Stop Time		Time		3.5 - 4.5		Time		Time					
		Analyst		Time		Analyst		Analyst					
				Analyst									

RELINQUISHED BY: (SIGNATURE) <i>Lee State</i>	DATE 4-19-21	TIME 12:00pm	RELINQUISHED BY: (SIGNATURE) <i>Ricky Turner</i>	DATE 4-19-21	TIME 2:00	RELINQUISHED BY: (SIGNATURE) <i>Larry Jones</i>	DATE 4/19/21	TIME 1430
RECEIVED BY: (SIGNATURE) <i>Ricky Turner</i>	DATE 4-19-21	TIME 11:30	RECEIVED BY: (SIGNATURE) <i>Larry Jones</i>	DATE 4/19/21	TIME 1400	RECEIVED BY: (SIGNATURE) <i>Don Bos</i>	DATE 4-19-21	TIME 1430
RECEIVED FOR LABORATORY USE BY: (SIGNATURE) <i>Sydney Deek</i>	DATE 4/19/21	TIME 1550	SAMPLE STATUS: <input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception					

SET-001-FLD REV. 0

1550





# SOUTHERN ENVIRONMENTAL TESTING

May 05, 2021

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
DB02128-01	#1 East Gadsden	04/27/2021	04/27/2021
DB02128-02	#2 East Gadsden	04/27/2021	04/27/2021
DB02128-03	#3 East Gadsden	04/27/2021	04/27/2021
DB02128-04	#7 West Gadsden	04/27/2021	04/27/2021
DB02128-05	#5 West Gadsden	04/27/2021	04/27/2021
DB02128-06	#6 West Gadsden	04/27/2021	04/27/2021

This cover page and the attached chain-of-custody record(s) are integral parts of your report. Southern Environmental Testing considers this report your official record. This information shall remain in Southern Environmental Testing's active database for a period of one (1) calendar year before archiving. Any replacement of this information after archiving may result in an administrative fee to cover the cost of retrieval.

If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Jimmy Wilson  
Vice President Lab Operations

3103 Northington Court  
Florence, AL 35630  
(256) 740-5532

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2919 Fairgrounds Road SW  
Decatur, AL 35603  
(256) 280-2567

PO Box 2084  
Decatur, AL 35602  
(256) 350-0686 Fax





## SAMPLE RESULTS REPORT

Report Date/Time: 05/05/2021 11:05

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

*This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.*

Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

## Sample Point: #1 East Gadsden

Sample ID: DB02128-01

Collected: 04/27/2021

Submitted: 04/27/2021

## Inorganics

Fecal Coliform

123000

mpn/g dry wt.

Total Solids

32.2

%

## Sample Point: #2 East Gadsden

Sample ID: DB02128-02

Collected: 04/27/2021

Submitted: 04/27/2021

## Inorganics

Fecal Coliform

167000

mpn/g dry wt.

Total Solids

31.5

%

## Sample Point: #3 East Gadsden

Sample ID: DB02128-03

Collected: 04/27/2021

Submitted: 04/27/2021

## Inorganics

Fecal Coliform

130000

mpn/g dry wt.

Total Solids

30.5

%

## Sample Point: #7 West Gadsden

Sample ID: DB02128-04

Collected: 04/27/2021

Submitted: 04/27/2021

## Inorganics

Fecal Coliform

&lt;1550

mpn/g dry wt.

Total Solids

23.2

%

## Sample Point: #5 West Gadsden

Sample ID: DB02128-05

Collected: 04/27/2021

Submitted: 04/27/2021

## Inorganics

Fecal Coliform

&lt;1740

mpn/g dry wt.

Total Solids

20.6

%

## Sample Point: #6 West Gadsden

Sample ID: DB02128-06

Collected: 04/27/2021

Submitted: 04/27/2021

## Inorganics

Fecal Coliform

&lt;1690

mpn/g dry wt.

Total Solids

21.2

%

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## SAMPLE RESULTS REPORT

Report Date/Time: 05/05/2021 11:05

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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All calculations are performed prior to rounding per EPA and *Standard Methods* requirements. Calibration data for field analyses conducted by SET or *ENERSOLV* personnel are available upon request.

## Data Qualifiers

< Less than reporting limit

## Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB02128-01	Total Solids	SM 2540 G-2011	RAC	Decatur	04/27/2021 10:00	04/27/2021 14:00	
DB02128-01	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/27/2021 10:00	04/28/2021 06:00	04/29/2021 07:45
DB02128-02	Total Solids	SM 2540 G-2011	RAC	Decatur	04/27/2021 10:00	04/27/2021 14:00	
DB02128-02	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/27/2021 10:00	04/28/2021 06:00	04/29/2021 07:45
DB02128-03	Total Solids	SM 2540 G-2011	RAC	Decatur	04/27/2021 10:00	04/27/2021 14:00	
DB02128-03	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/27/2021 10:00	04/28/2021 06:00	04/29/2021 07:45
DB02128-04	Total Solids	SM 2540 G-2011	RAC	Decatur	04/27/2021 10:30	04/27/2021 14:00	
DB02128-04	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/27/2021 10:30	04/28/2021 06:00	04/29/2021 07:45
DB02128-05	Total Solids	SM 2540 G-2011	RAC	Decatur	04/27/2021 10:30	04/27/2021 14:00	
DB02128-05	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/27/2021 10:30	04/28/2021 06:00	04/29/2021 07:45
DB02128-06	Total Solids	SM 2540 G-2011	RAC	Decatur	04/27/2021 10:30	04/27/2021 14:00	
DB02128-06	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	04/27/2021 10:30	04/28/2021 06:00	04/29/2021 07:45

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SOUTHERN ENVIRONMENTAL TESTING

**ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD**  
**2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603**  
**3103 NORTHINGTON COURT, FLORENCE, AL 35630**

PAGE 1 of 1

Sludge

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COMPANY/CLIENT NAME <b>Recyc Systems</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		<b>REQUESTED ANALYSES</b>												
CLIENT POINT OF CONTACT <b>Ricky Turner</b>		CLIENT PHYSICAL ADDRESS		CITY/STATE/ZIP														
CLIENT EMAIL <b>recyclc2@bellsouth.net</b>		PHONE NUMBER <b>256-738-0125</b>		OTHER INFORMATION		<div style="display: flex; justify-content: space-around;"> <div>SLUDGE FECAL</div> <div>503 METALS</div> <div>TOTAL SOLIDS</div> <div>NITRATE</div> <div>NH3</div> <div>PT</div> <div>TKN</div> <div>KICP</div> <div>VS - BELFORE</div> <div>VS - AFTER</div> </div>												
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)														
SET LAB NUMBER	SAMPLE DESCRIPTION	SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP													
D002128-01	#1 East Gadsden	4-27-21	10:00	X		X												
-02	#2 " "	"	"	X		X												
-03	#3 " "	"	"	X		X												

Comments:

Collector to complete shaded areas, as applicable

SAMPLE TEMPERATURE

RECEIVED @ \_\_\_\_\_

COMPOSITE SAMPLER INFO		FIELD INFORMATION								Qty	Type - Cool 6c	pH	Parameters
		SM 4500H+B		SM 4500-Cl D		SM 4500-O G		SM 2550B					
Start Date		pH		TRC		DO		Temp					
Date		su		mg/l		mg/l		deg C					
Start Time		Date		Adj pH		Date		Date					
Stop Date		Time		Date		Time		Time					
Stop Time		Analyst		Time		Analyst		Analyst					
				Analyst									

RELINQUISHED BY: (SIGNATURE) <i>Mark V. Jones</i>	DATE 4-27-21	TIME 10:00	RELINQUISHED BY: (SIGNATURE) <i>Ricky Turner</i>	DATE 4-27-21	TIME 1:00	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
RECEIVED BY: (SIGNATURE) <i>Ricky Turner</i>	DATE 4-27-21	TIME 10:00	RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
RECEIVED FOR LABORATORY USE BY: (SIGNATURE) <i>Jaym Sones</i>			DATE 4/27/21	TIME 1300	SAMPLE STATUS: <input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception			

SET-001-FLD REV. 0





SOUTHERN ENVIRONMENTAL TESTING

## ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD

2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603

3103 NORTHINGTON COURT, FLORENCE, AL 35630

PAGE 1 of 1

Sludge

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COMPANY/CLIENT NAME <b>Recyc Systems</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		REQUESTED ANALYSES									
CLIENT POINT OF CONTACT <b>Ricky Turner</b>		CLIENT PHYSICAL ADDRESS		CITY/STATE/ZIP											
CLIENT EMAIL <b>recyclc2@bellsouth.net</b>		PHONE NUMBER <b>256-738-0125</b>		OTHER INFORMATION		SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PT	TKN	KICP	VS - BELFORE	VS - AFTER
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)											
SET LAB NUMBER	SAMPLE DESCRIPTION	SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP										
DBo2128-04	#4 West Gadsden	4-27-21	10:30	X		X									
-05	#5 " "	"	"	X		X									
-06	#6 " "	"	"	X		X									

Comments:

Collector to complete shaded areas, as applicable

SAMPLE TEMPERATURE

RECEIVED @ \_\_\_\_\_

COMPOSITE SAMPLER INFO		FIELD INFORMATION						Qty	Type - Cool 6c	pH	Parameters
		SM 4500H+B		SM 4500-CL D		SM 4500-O G		SM 2550B			
Start Date		pH		TRC		DO		Temp			
		su		mg/l		mg/l		deg C			
Start Time		Date		Adj pH		Date		Date			
				3.5 - 4.5							
Stop Date		Time		Date		Time		Time			
Stop Time		Analyst		Time		Analyst		Analyst			
				Analyst							

RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
<i>[Signature]</i>	4-27-21	10:30	<i>Ricky Turner</i>	4-27-21	1:00			
RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
<i>[Signature]</i>	4-27-21	10:30						
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)			DATE	TIME	SAMPLE STATUS:			
<i>[Signature]</i>			4/27/21	1300	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception			

SET-001-FLD REV. 0



# SOUTHERN ENVIRONMENTAL TESTING

July 22, 2021

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
DB03989-01	#11 West Gadsden	07/07/2021	07/07/2021
DB03989-02	#12 West Gadsden	07/07/2021	07/07/2021
DB03989-03	#13 West Gadsden	07/07/2021	07/07/2021
DB03989-04	#14 West Gadsden	07/07/2021	07/07/2021
DB03989-05	#15 West Gadsden	07/07/2021	07/07/2021
DB03989-06	#16 WestGadsden	07/07/2021	07/07/2021
DB03989-07	#9 West Gadsden	07/07/2021	07/07/2021
DB03989-08	#10 West Gadsden	07/07/2021	07/07/2021

This cover page and the attached chain-of-custody record(s) are integral parts of your report. Southern Environmental Testing considers this report your official record. This information shall remain in Southern Environmental Testing's active database for a period of one (1) calendar year before archiving. Any replacement of this information after archiving may result in an administrative fee to cover the cost of retrieval.

If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Jimmy Wilson  
Vice President Lab Operations

Reviewed by:

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## SAMPLE RESULTS REPORT

Report Date/Time: 07/22/2021 12:59

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

*This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.*

Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

Sample Point: #11 West Gadsden

Sample ID: DB03989-01

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform

134000 mpn/g dry wt.

Total Solids

23.5 %

Sample Point: #12 West Gadsden

Sample ID: DB03989-02

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform

52000 mpn/g dry wt.

Total Solids

25.6 %

Sample Point: #13 West Gadsden

Sample ID: DB03989-03

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform

163000 mpn/g dry wt.

Total Solids

24.3 %

Sample Point: #14 West Gadsden

Sample ID: DB03989-04

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform

62500 mpn/g dry wt.

Total Solids

24.5 %

Sample Point: #15 West Gadsden

Sample ID: DB03989-05

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform

63800 mpn/g dry wt.

Total Solids

24.0 %

Sample Point: #16 WestGadsden

Sample ID: DB03989-06

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform

52000 mpn/g dry wt.

Total Solids

24.5 %

Sample Point: #9 West Gadsden

Sample ID: DB03989-07

Collected: 07/07/2021

Submitted: 07/07/2021

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## SAMPLE RESULTS REPORT

Report Date/Time: 07/22/2021 12:59

## REPORT TO

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Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

Sample Point: #9 West Gadsden

Sample ID: DB03989-07

Collected: 07/07/2021

Submitted: 07/07/2021

## Anions by IC

Nitrate-Nitrogen	<0.169	mg/kg dry
------------------	--------	-----------

## Inorganics

Ammonia-Nitrogen	3380	mg/kg dry
Total Kjeldahl Nitrogen	12000	mg/kg dry
Total Solids	23.7	%

## Metals by ICP-OES

Total Arsenic	3.71	mg/kg dry
Total Cadmium	2.87	mg/kg dry
Total Chromium	50.2	mg/kg dry
Total Copper	255	mg/kg dry
Total Potassium	575	mg/kg dry
Total Molybdenum	12.4	mg/kg dry
Total Nickel	17.8	mg/kg dry
Total Phosphorus	25800	mg/kg dry
Total Lead	170	mg/kg dry
Total Selenium	4.24	mg/kg dry
Total Zinc	1460	mg/kg dry

## Miscellaneous Metals

Total Mercury	0.556	mg/kg dry
---------------	-------	-----------

Sample Point: #10 West Gadsden

Sample ID: DB03989-08

Collected: 07/07/2021

Submitted: 07/07/2021

## Inorganics

Fecal Coliform	38700	mpn/g dry wt.
Total Solids	23.4	%

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## SAMPLE RESULTS REPORT

Report Date/Time: 07/22/2021 12:59

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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## Data Qualifiers

< Less than reporting limit

## Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB03989-01	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-01	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30
DB03989-02	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-02	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30
DB03989-03	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-03	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30
DB03989-04	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-04	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30
DB03989-05	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-05	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30
DB03989-06	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-06	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30

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## SAMPLE RESULTS REPORT

Report Date/Time: 07/22/2021 12:59

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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## Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB03989-07	Nitrate-Nitrogen	9056A/300.0	AGD	Florence	07/07/2021 09:00	07/13/2021 08:50	
DB03989-07	Total Kjeldahl Nitrogen	EPA 351.2 Rev. 2.0	WCC	Florence	07/07/2021 09:00	07/20/2021 09:30	
DB03989-07	Arsenic	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Cadmium	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Chromium	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Copper	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Lead	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Molybdenum	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Nickel	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Phosphorus	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Potassium	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Selenium	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Zinc	EPA 6010C	FLY	Florence	07/07/2021 09:00	07/12/2021 08:49	
DB03989-07	Total Mercury	EPA 7471B	WCC	Florence	07/07/2021 09:00	07/12/2021 09:50	
DB03989-07	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-07	Ammonia-Nitrogen	SM 4500 NH3 C-2011	WCC	Florence	07/07/2021 09:00	07/13/2021 08:05	
DB03989-08	Total Solids	SM 2540 G-2011	RAC	Decatur	07/07/2021 09:00	07/07/2021 14:00	
DB03989-08	Fecal Coliform - Sludge	SM 9222D-2006	RAC	Decatur	07/07/2021 09:00	07/08/2021 06:00	07/09/2021 09:30

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SOUTHERN ENVIRONMENTAL TESTING

**ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD**  
**2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603**  
**3103 NORTHINGTON COURT, FLORENCE, AL 35630**

PAGE	1	of	1
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COMPANY/CLIENT NAME <b>Denali Water</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		<b>REQUESTED ANALYSES</b>											
CLIENT POINT OF CONTACT <b>Jeff Retzke</b>		CLIENT PHYSICAL ADDRESS <b>1001 Fraser Avenue</b>		CITY/STATE/ZIP <b>Huntsville, AL 35801</b>													
CLIENT EMAIL <b>jeff.retzke@denaliwater.com</b>		PHONE NUMBER <b>256-503-4300</b>		OTHER INFORMATION		SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PICP	TKN	KICP	VS - BELFORE	VS - AFTER		
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)													
SET LAB NUMBER	SAMPLE DESCRIPTION			SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP										
DB039189-01	#11 West Gadsden			7-7-21	9:00	X		X									
-02	#12 West Gadsden			7-7-21	9:00	X		X									
-03	#13 " "			"	"	X		X									
-04	#14 " "			"	"	X		X									
-05	#15 " "			"	"	X		X									
-06	#16 " "			"	"	X		X									
<b>Comments:</b> <p align="center"><i>Collector to complete shaded areas, as applicable</i></p>																	
<p align="right"><b>SAMPLE TEMPERATURE</b> RECEIVED @ _____</p>																	
<b>COMPOSITE SAMPLER INFO</b>		<b>FIELD INFORMATION</b>								Qty	Type - Cool 6c	pH	Parameters				
		SM 4500H+B		SM 4500-CI D		SM 4500-O G		SM 2550B									
Start		pH		TRC		DO		Temp									
Date		su		mg/l		mg/l		deg C									
Start		Date		Date		Date		Date									
Time																	
Stop		Time		Time		Time		Time									
Date																	
Stop		Analyst		Analyst		Analyst		Analyst									
Date																	
Time																	
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME						
<i>See Sheet</i>		7-7-21	9:00 AM	<i>Jeff Retzke</i>		7-7-21	12:30										
RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME						
<i>Jeff Retzke</i>		7-7-21	9:00														
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)		DATE	TIME	SAMPLE STATUS:													
<i>Janet Jones</i>		7/7/21	1230	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception													

SET-001-FLD REV. 0





SOUTHERN ENVIRONMENTAL TESTING

**ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD**  
**2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603**  
**3103 NORTHINGTON COURT, FLORENCE, AL 35630**

PAGE 1 of 1

(256) 350-0846 www.setesting.com

COMPANY/CLIENT NAME <b>Denali Water</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		<b>REQUESTED ANALYSES</b>									
CLIENT POINT OF CONTACT <b>Jeff Retzke</b>		CLIENT PHYSICAL ADDRESS <b>1001 Fraser Avenue</b>		CITY/STATE/ZIP <b>Huntsville, AL 35801</b>											
CLIENT EMAIL <b>jeff.retzke@denaliwater.com</b>		PHONE NUMBER <b>256-503-4300</b>		OTHER INFORMATION		SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PICP	TKN	KICP	VS - BELFORE	VS - AFTER
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)											
SET LAB NUMBER	SAMPLE DESCRIPTION	SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP										
DB03989-01	#9 West Gadsden	7-7-21	9:00		X		X	X	X	X	X	X	X		
-08	#10 West Gadsden	7-7-21	9:00	X		X									

Comments:

Collector to complete shaded areas, as applicable

SAMPLE TEMPERATURE  
RECEIVED @ \_\_\_\_\_

COMPOSITE SAMPLER INFO		FIELD INFORMATION								Qty	Type - Cool 6c	pH	Parameters
		SM 4500H+B		SM 4500-CI D		SM 4500-O G		SM 2550B					
Start Date		pH		TRC		DO		Temp					
Start Time		su		mg/l		mg/l		deg C					
Stop Date		Date		Date		Date		Date					
Stop Time		Time		Time		Time		Time					
Stop Time		Analyst		Analyst		Analyst		Analyst					

RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME	RELINQUISHED BY: (SIGNATURE)	DATE	TIME
<i>Be Blate</i>	7-7-21	9:00 AM	<i>Mark Turner</i>	7-7-21	12:30	<i>Jayn Jones</i>	7/7/21	1430
RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME	RECEIVED BY: (SIGNATURE)	DATE	TIME
<i>Jayn Jones</i>	7/7/21	1230	<i>Jon Dean</i>	7/7/21	1430			
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)	DATE	TIME	SAMPLE STATUS:					
<i>Anthony Penn</i>	7/7/21	1550	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception					

SET-001-FLD REV. 0



November 12, 2021

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

We appreciate the opportunity to provide our services to you on this project. Please find attached the data for the sample(s) listed below:

Lab ID	Sample Description	Date Collected	Date Submitted
DB06784-01	#9 West Gadsden	10/18/2021	10/18/2021
DB06784-02	#10 West Gadsden	10/18/2021	10/18/2021
DB06784-03	#11 West Gadsden	10/18/2021	10/18/2021
DB06784-04	#12 West Gadsden	10/18/2021	10/18/2021
DB06784-05	#13 East Gadsden	10/18/2021	10/18/2021
DB06784-06	#14 West Gadsden	10/18/2021	10/18/2021
DB06784-07	#15 West Gadsden	10/18/2021	10/18/2021
DB06784-08	#16 West Gadsden	10/18/2021	10/18/2021

This cover page and the attached chain-of-custody record(s) are integral parts of your report. Southern Environmental Testing considers this report your official record. This information shall remain in Southern Environmental Testing's active database for a period of one (1) calendar year before archiving. Any replacement of this information after archiving may result in an administrative fee to cover the cost of retrieval.

If you have any questions or would like more information regarding these analyses, please call our Decatur facility at (256) 280-2567 or our Florence facility at (256) 740-5532.

Margaret Aiken  
Project Manager

Reviewed by:

3103 Northington Court  
Florence, AL 35630  
(256) 740-5532

PO Box 487  
Florence, AL 35630  
(256) 740-5529 Fax

2919 Fairgrounds Road SW  
Decatur, AL 35603  
(256) 280-2567

PO Box 2084  
Decatur, AL 35602  
(256) 350-0686 Fax





## SAMPLE RESULTS REPORT

Report Date/Time: 11/12/2021 16:39

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

*This report may contain information that is confidential and/or proprietary. This information is intended for the addressee only and may not be copied or disseminated except in full without the written consent of Southern Environmental Testing.*

Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

Sample Point: #9 West Gadsden

Sample ID: DB06784-01

Collected: 10/18/2021

Submitted: 10/18/2021

## Anions by IC

Nitrate-Nitrogen	<0.127	mg/kg dry
------------------	--------	-----------

## Inorganics

Ammonia-Nitrogen	4580	mg/kg dry
Total Kjeldahl Nitrogen	32100	mg/kg dry
Total Solids	23.8	%

## Metals by ICP-OES

Total Arsenic	6.21	mg/kg dry
Total Cadmium	2.51	mg/kg dry
Total Chromium	52.6	mg/kg dry
Total Copper	229	mg/kg dry
Total Potassium	521	mg/kg dry
Total Molybdenum	5.29	mg/kg dry
Total Nickel	16.6	mg/kg dry
Total Phosphorus	26200	mg/kg dry
Total Lead	178	mg/kg dry
Total Selenium	1.27	mg/kg dry
Total Zinc	1470	mg/kg dry

Sample Point: #10 West Gadsden

Sample ID: DB06784-02

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform	8130	mpn/g dry wt.
Total Solids	23.4	%

Sample Point: #11 West Gadsden

Sample ID: DB06784-03

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform	8060	mpn/g dry wt.
Total Solids	23.6	%

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## SAMPLE RESULTS REPORT

Report Date/Time: 11/12/2021 16:39

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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Analyte Name	Result	Units	Qualifier	Regulatory Limit
--------------	--------	-------	-----------	------------------

Sample Point: #12 West Gadsden

Sample ID: DB06784-04

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform

19700

mpn/g dry wt.

Total Solids

23.5

%

Sample Point: #13 East Gadsden

Sample ID: DB06784-05

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform

9590

mpn/g dry wt.

Total Solids

23.3

%

Sample Point: #14 West Gadsden

Sample ID: DB06784-06

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform

5260

mpn/g dry wt.

Total Solids

23.4

%

Sample Point: #15 West Gadsden

Sample ID: DB06784-07

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform

10600

mpn/g dry wt.

Total Solids

23.2

%

Sample Point: #16 West Gadsden

Sample ID: DB06784-08

Collected: 10/18/2021

Submitted: 10/18/2021

## Inorganics

Fecal Coliform

5300

mpn/g dry wt.

Total Solids

23.2

%

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## SAMPLE RESULTS REPORT

Report Date/Time: 11/12/2021 16:39

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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All calculations are performed prior to rounding per EPA and *Standard Methods* requirements. Calibration data for field analyses conducted by SET or *ENERSOLV* personnel are available upon request.

## Data Qualifiers

< Less than reporting limit

## Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB06784-01	Nitrate-Nitrogen	9056A/300.0	AGD	Florence	10/18/2021 12:00	10/25/2021 08:20	
DB06784-01	Total Kjeldahl Nitrogen	EPA 351.2 Rev. 2.0	RAC	Florence	10/18/2021 12:00	11/12/2021 06:00	
DB06784-01	Total Phosphorus	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Arsenic	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Cadmium	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Total Chromium	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Total Copper	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Lead	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Total Molybdenum	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Total Nickel	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Total Potassium	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Selenium	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Zinc	EPA 6010C	FLY	Florence	10/18/2021 12:00	10/25/2021 08:30	
DB06784-01	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-01	Ammonia-Nitrogen	SM 4500 NH3 C-2011	RAC	Florence	10/18/2021 12:00	11/12/2021 09:00	
DB06784-02	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-02	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00

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## SAMPLE RESULTS REPORT

Report Date/Time: 11/12/2021 16:39

## REPORT TO

Jeff Retzke  
Denali Water  
35 Refreshment Place  
Decatur, AL 35601

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## Analysis Information

Lab Number	Analysis	Referenced Method	Analyst	SET Facility	Collection Date/Time	Analysis Start Date/Time	Analysis End Date/Time (BOD, CBOD, Coliforms)
DB06784-03	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-03	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00
DB06784-04	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-04	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00
DB06784-05	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-05	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00
DB06784-06	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-06	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00
DB06784-07	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-07	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00
DB06784-08	Total Solids	SM 2540 G-2011	RAC	Decatur	10/18/2021 12:00	10/18/2021 16:30	
DB06784-08	Fecal Coliform - Sludge	SM 9221E-2006	RAC	Decatur	10/18/2021 12:00	10/19/2021 06:00	10/20/2021 10:00

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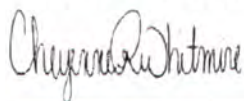
## ANALYTICAL REPORT

Eurofins TestAmerica, Pensacola  
3355 McLemore Drive  
Pensacola, FL 32514  
Tel: (850)474-1001

Laboratory Job ID: 400-210255-1  
Laboratory Sample Delivery Group: #9 West Gadsden  
Client Project/Site: Denali Water Solutions

For:  
Southern Environmental Testing  
3103 Northington Court  
Florence, Alabama 35630

Attn: Allison Dixon



Authorized for release by:  
11/4/2021 4:48:17 PM

Cheyenne Whitmire, Project Manager II  
(850)471-6222  
[Cheyenne.Whitmire@Eurofinset.com](mailto:Cheyenne.Whitmire@Eurofinset.com)

### LINKS

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*The test results in this report meet all 2003 NELAC, 2009 TNI, and 2016 TNI requirements for accredited parameters, exceptions are noted in this report. This report may not be reproduced except in full, and with written approval from the laboratory. For questions please contact the Project Manager at the e-mail address or telephone number listed on this page.*

*This report has been electronically signed and authorized by the signatory. Electronic signature is intended to be the legally binding equivalent of a traditionally handwritten signature.*

*Results relate only to the items tested and the sample(s) as received by the laboratory.*

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## Detection Summary

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

**Client Sample ID: DB06784-01**

**Lab Sample ID: 400-210255-1**

Analyte	Result	Qualifier	RL	MDL	Unit	Dil Fac	D	Method	Prep Type
Mercury	0.35		0.063		mg/Kg	1	☉	7471B	Total/NA

This Detection Summary does not include radiochemical test results.

Eurofins TestAmerica, Pensacola

## Method Summary

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

Method	Method Description	Protocol	Laboratory
7471B	Mercury (CVAA)	SW846	TAL PEN
Moisture	Percent Moisture	EPA	TAL PEN
7471B	Preparation, Mercury	SW846	TAL PEN

### Protocol References:

EPA = US Environmental Protection Agency

SW846 = "Test Methods For Evaluating Solid Waste, Physical/Chemical Methods", Third Edition, November 1986 And Its Updates.

### Laboratory References:

TAL PEN = Eurofins TestAmerica, Pensacola, 3355 McLemore Drive, Pensacola, FL 32514, TEL (850)474-1001

## Sample Summary

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

Lab Sample ID	Client Sample ID	Matrix	Collected	Received
400-210255-1	DB06784-01	Solid	10/18/21 12:00	10/27/21 09:05



## Client Sample Results

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

**Client Sample ID: DB06784-01**

**Lab Sample ID: 400-210255-1**

Date Collected: 10/18/21 12:00

Matrix: Solid

Date Received: 10/27/21 09:05

### General Chemistry

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Percent Solids	23.7		0.01		%			10/29/21 09:02	1
Percent Moisture	76.3		0.01		%			10/29/21 09:02	1

**Client Sample ID: DB06784-01**

**Lab Sample ID: 400-210255-1**

Date Collected: 10/18/21 12:00

Matrix: Solid

Date Received: 10/27/21 09:05

Percent Solids: 23.7

### Method: 7471B - Mercury (CVAA)

Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	0.35		0.063		mg/Kg	☆	11/04/21 09:20	11/04/21 12:10	1

## Definitions/Glossary

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

### Glossary

Abbreviation	These commonly used abbreviations may or may not be present in this report.
▫	Listed under the "D" column to designate that the result is reported on a dry weight basis
%R	Percent Recovery
CFL	Contains Free Liquid
CFU	Colony Forming Unit
CNF	Contains No Free Liquid
DER	Duplicate Error Ratio (normalized absolute difference)
Dil Fac	Dilution Factor
DL	Detection Limit (DoD/DOE)
DL, RA, RE, IN	Indicates a Dilution, Re-analysis, Re-extraction, or additional Initial metals/anion analysis of the sample
DLC	Decision Level Concentration (Radiochemistry)
EDL	Estimated Detection Limit (Dioxin)
LOD	Limit of Detection (DoD/DOE)
LOQ	Limit of Quantitation (DoD/DOE)
MCL	EPA recommended "Maximum Contaminant Level"
MDA	Minimum Detectable Activity (Radiochemistry)
MDC	Minimum Detectable Concentration (Radiochemistry)
MDL	Method Detection Limit
ML	Minimum Level (Dioxin)
MPN	Most Probable Number
MQL	Method Quantitation Limit
NC	Not Calculated
ND	Not Detected at the reporting limit (or MDL or EDL if shown)
NEG	Negative / Absent
POS	Positive / Present
PQL	Practical Quantitation Limit
PRES	Presumptive
QC	Quality Control
RER	Relative Error Ratio (Radiochemistry)
RL	Reporting Limit or Requested Limit (Radiochemistry)
RPD	Relative Percent Difference, a measure of the relative difference between two points
TEF	Toxicity Equivalent Factor (Dioxin)
TEQ	Toxicity Equivalent Quotient (Dioxin)
TNTC	Too Numerous To Count



## Lab Chronicle

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

**Client Sample ID: DB06784-01**

**Lab Sample ID: 400-210255-1**

**Date Collected: 10/18/21 12:00**

**Matrix: Solid**

**Date Received: 10/27/21 09:05**

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Analysis	Moisture		1			553654	10/29/21 09:02	WJM	TAL PEN

**Client Sample ID: DB06784-01**

**Lab Sample ID: 400-210255-1**

**Date Collected: 10/18/21 12:00**

**Matrix: Solid**

**Date Received: 10/27/21 09:05**

**Percent Solids: 23.7**

Prep Type	Batch Type	Batch Method	Run	Dil Factor	Initial Amount	Final Amount	Batch Number	Prepared or Analyzed	Analyst	Lab
Total/NA	Prep	7471B			.5346 g	40 mL	554294	11/04/21 09:20	NET	TAL PEN
Total/NA	Analysis	7471B		1			554545	11/04/21 12:10	NET	TAL PEN

**Laboratory References:**

TAL PEN = Eurofins TestAmerica, Pensacola, 3355 McLemore Drive, Pensacola, FL 32514, TEL (850)474-1001

## QC Association Summary

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

### Metals

#### Prep Batch: 554294

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
400-210255-1	DB06784-01	Total/NA	Solid	7471B	
MB 400-554294/14-A	Method Blank	Total/NA	Solid	7471B	
LCS 400-554294/15-A	Lab Control Sample	Total/NA	Solid	7471B	
400-210552-A-1-B MS	Matrix Spike	Total/NA	Solid	7471B	
400-210552-A-1-C MSD	Matrix Spike Duplicate	Total/NA	Solid	7471B	

#### Analysis Batch: 554545

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
400-210255-1	DB06784-01	Total/NA	Solid	7471B	554294
MB 400-554294/14-A	Method Blank	Total/NA	Solid	7471B	554294
LCS 400-554294/15-A	Lab Control Sample	Total/NA	Solid	7471B	554294
400-210552-A-1-B MS	Matrix Spike	Total/NA	Solid	7471B	554294
400-210552-A-1-C MSD	Matrix Spike Duplicate	Total/NA	Solid	7471B	554294

### General Chemistry

#### Analysis Batch: 553654

Lab Sample ID	Client Sample ID	Prep Type	Matrix	Method	Prep Batch
400-210255-1	DB06784-01	Total/NA	Solid	Moisture	
400-210341-B-12 MS	Matrix Spike	Total/NA	Solid	Moisture	
400-210341-B-12 MSD	Matrix Spike Duplicate	Total/NA	Solid	Moisture	
400-209103-A-11 DU	Duplicate	Total/NA	Solid	Moisture	

## QC Sample Results

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

### Method: 7471B - Mercury (CVAA)

Lab Sample ID: MB 400-554294/14-A  
Matrix: Solid  
Analysis Batch: 554545

Client Sample ID: Method Blank  
Prep Type: Total/NA  
Prep Batch: 554294

Analyte	MB Result	MB Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Mercury	<0.013		0.013		mg/Kg		11/04/21 09:20	11/04/21 11:57	1

Lab Sample ID: LCS 400-554294/15-A  
Matrix: Solid  
Analysis Batch: 554545

Client Sample ID: Lab Control Sample  
Prep Type: Total/NA  
Prep Batch: 554294

Analyte	Spike Added	LCS Result	LCS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	0.0671	0.0542		mg/Kg		81	80 - 120

Lab Sample ID: 400-210552-A-1-B MS  
Matrix: Solid  
Analysis Batch: 554545

Client Sample ID: Matrix Spike  
Prep Type: Total/NA  
Prep Batch: 554294

Analyte	Sample Result	Sample Qualifier	Spike Added	MS Result	MS Qualifier	Unit	D	%Rec	%Rec. Limits
Mercury	<0.015		0.148	0.123		mg/Kg		84	80 - 120

Lab Sample ID: 400-210552-A-1-C MSD  
Matrix: Solid  
Analysis Batch: 554545

Client Sample ID: Matrix Spike Duplicate  
Prep Type: Total/NA  
Prep Batch: 554294

Analyte	Sample Result	Sample Qualifier	Spike Added	MSD Result	MSD Qualifier	Unit	D	%Rec	%Rec. Limits	RPD Limit
Mercury	<0.015		0.152	0.125		mg/Kg		82	80 - 120	1 20

### Method: Moisture - Percent Moisture

Lab Sample ID: 400-209103-A-11 DU  
Matrix: Solid  
Analysis Batch: 553654

Client Sample ID: Duplicate  
Prep Type: Total/NA

Analyte	Sample Result	Sample Qualifier	DU Result	DU Qualifier	Unit	D	RPD Limit
Percent Solids	86.7		88.0		%		1 10
Percent Moisture	13.3		12.0		%		10



### Chain of Custody Record

symptoms

[illegible]

## Login Sample Receipt Checklist

Client: Southern Environmental Testing

Job Number: 400-210255-1  
SDG Number: #9 West Gadsden

Login Number: 210255

List Source: Eurofins TestAmerica, Pensacola

List Number: 1

Creator: Whitley, Adrian

Question	Answer	Comment
Radioactivity wasn't checked or is $\leq$ background as measured by a survey meter.	N/A	
The cooler's custody seal, if present, is intact.	N/A	
Sample custody seals, if present, are intact.	N/A	
The cooler or samples do not appear to have been compromised or tampered with.	True	
Samples were received on ice.	True	
Cooler Temperature is acceptable.	True	
Cooler Temperature is recorded.	True	3.3°C IR9
COC is present.	True	
COC is filled out in ink and legible.	True	
COC is filled out with all pertinent information.	True	
Is the Field Sampler's name present on COC?	True	
There are no discrepancies between the containers received and the COC.	True	
Samples are received within Holding Time (excluding tests with immediate HTs)	True	
Sample containers have legible labels.	True	
Containers are not broken or leaking.	True	
Sample collection date/times are provided.	True	
Appropriate sample containers are used.	True	
Sample bottles are completely filled.	True	
Sample Preservation Verified.	N/A	
There is sufficient vol. for all requested analyses, incl. any requested MS/MSDs	True	
Containers requiring zero headspace have no headspace or bubble is $<6\text{mm}$ (1/4").	N/A	
Multiphasic samples are not present.	True	
Samples do not require splitting or compositing.	True	
Residual Chlorine Checked.	N/A	

## Accreditation/Certification Summary

Client: Southern Environmental Testing  
Project/Site: Denali Water Solutions

Job ID: 400-210255-1  
SDG: #9 West Gadsden

### Laboratory: Eurofins TestAmerica, Pensacola

All accreditations/certifications held by this laboratory are listed. Not all accreditations/certifications are applicable to this report.

Authority	Program	Identification Number	Expiration Date
Alabama	State	40150	06-30-22
ANAB	ISO/IEC 17025	L2471	02-23-23
Arizona	State	AZ0710	01-12-22
Arkansas DEQ	State	88-0689	09-01-22
California	State	2510	06-30-22
Florida	NELAP	E81010	06-30-22
Georgia	State	E81010(FL)	06-30-22
Illinois	NELAP	200041	10-09-22
Iowa	State	367	08-01-22
Kansas	NELAP	E-10253	11-30-21
Kentucky (UST)	State	53	06-30-22
Kentucky (VW)	State	KY98030	12-31-21
Louisiana	NELAP	30976	06-30-22
Louisiana (DW)	State	LA017	12-31-21
Maryland	State	233	09-30-22
Massachusetts	State	M-FL094	06-30-22
Michigan	State	9912	06-30-22
New Jersey	NELAP	FL006	06-30-22
North Carolina (VW/SW)	State	314	12-31-21
Oklahoma	State	9810	08-31-22
Pennsylvania	NELAP	68-00467	01-31-22
Rhode Island	State	LAO00307	12-30-21
South Carolina	State	96026	06-30-22
Tennessee	State	TN02907	06-30-22
Texas	NELAP	T104704286	09-30-22
US Fish & Wildlife	US Federal Programs	058448	07-31-22
USDA	US Federal Programs	P330-21-00056	05-17-24
Virginia	NELAP	460166	06-14-22
Washington	State	C915	05-15-22
West Virginia DEP	State	136	12-31-21





SOUTHERN ENVIRONMENTAL TESTING

**ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD**  
**2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603**  
**3103 NORTHINGTON COURT, FLORENCE, AL 35630**

PAGE 1 of 1

(256) 350-0846 www.setesting.com

COMPANY/CLIENT NAME <b>Denali Water</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		REQUESTED ANALYSES											
CLIENT POINT OF CONTACT <b>Jeff Retzke</b>		CLIENT PHYSICAL ADDRESS <b>1001 Fraser Avenue</b>		CITY/STATE/ZIP <b>Huntsville, AL 35801</b>													
CLIENT EMAIL <b>jeff.retzke@denaliwater.com</b>		PHONE NUMBER <b>256-503-4300</b>		OTHER INFORMATION													
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)													
SET LAB NUMBER	SAMPLE DESCRIPTION			SAMPLE TRANSFER/GRAB DATE	SAMPLE TRANSFER/GRAB TIME	GRAB	COMP	SLUDGE FECAL	503 METALS	TOTAL SOLIDS	NITRATE	NH3	PICP	TKN	KICP	VS - BELFLORE	VS - AFTER
DB007B401	#9 West Gadsden			10-18-21	12:00		X	X	X	X	X	X	X	X	X		
-02	#10 West Gadsden			10-18-21	12:00		X	X									
-03	#11 " "			"	"		X	X									
-04	#12 " "			"	"		X	X									
-05	#13 " "			"	"		X	X									
-06	#14 " "			"	"		X	X									
Comments:																	
Collector to complete shaded areas, as applicable																	
SAMPLE TEMPERATURE RECEIVED @ _____																	
COMPOSITE SAMPLER INFO		FIELD INFORMATION				Qty	Type - Cool 6c				pH	Parameters					
		SM 4500H+B		SM 4500-Cl D		SM 4500-O G		SM 2550B									
Start Date		pH		YRC		DO		Temp									
Start Time		su		mg/l		mg/l		deg C									
Stop Date		Date		Date		Date		Date									
Stop Time		Time		Time		Time		Time									
Stop Time		Analyst		Analyst		Analyst		Analyst									
RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME		
<i>[Signature]</i>		10-18-21	12:02	<i>[Signature]</i>		10-18-21	2:35	<i>[Signature]</i>		10/20/21	1430	<i>[Signature]</i>		10/20/21	1430		
RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME		
<i>[Signature]</i>		10-18-21	12:00	<i>[Signature]</i>		12/10/21	1435	<i>[Signature]</i>		10/20/21	1430	<i>[Signature]</i>		10/20/21	1430		
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)		DATE	TIME	SAMPLE STATUS:													
<i>[Signature]</i>		10/20/21	1545	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception													

SET-001-FLD REV. 0





SOUTHERN ENVIRONMENTAL TESTING

**ANALYSIS REQUEST AND CHAIN OF CUSTODY RECORD**  
**2919 FAIRGROUNDS ROAD SW, DECATUR, AL 35603**  
**3103 NORTHINGTON COURT, FLORENCE, AL 35630**

PAGE 1 of 1

(256) 350-0846 www.setesting.com

COMPANY/CLIENT NAME <b>Denali Water</b>		CLIENT P.O. NUMBER		ENERSOLV PROJECT NUMBER		<b>REQUESTED ANALYSES</b>											
CLIENT POINT OF CONTACT <b>Jeff Retzke</b>		CLIENT PHYSICAL ADDRESS <b>1001 Fraser Avenue</b>		CITY/STATE/ZIP <b>Huntsville, AL 35801</b>													
CLIENT EMAIL <b>jeff.retzke@denaliwater.com</b>		PHONE NUMBER <b>256-503-4300</b>		OTHER INFORMATION		<b>SLUDGE FECAL</b>	<b>503 METALS</b>	<b>TOTAL SOLIDS</b>	<b>NITRATE</b>	<b>NH3</b>	<b>PICP</b>	<b>TKN</b>	<b>KICP</b>	<b>VS - BELFORE</b>	<b>VS - AFTER</b>		
SAMPLE COLLECTED BY		EXPEDITED REPORT DELIVERY (SURCHARGE)		DATE DUE (REQUIRED)													
<b>SET LAB NUMBER</b>	<b>SAMPLE DESCRIPTION</b>	<b>SAMPLE TRANSFER/GRAB DATE</b>	<b>SAMPLE TRANSFER/GRAB TIME</b>	<b>GRAB</b>	<b>COMP</b>												
DBQ078407	#15 West Bradsher	10-18-21	12:00		X	X											
-08	#16 West Bradsher	10-18-21	12:00		X	X											

**Comments:**

*Collector to complete shaded areas, as applicable*

COMPOSITE SAMPLER INFO		FIELD INFORMATION				Qty	Type - Cool 6c	pH	Parameters
		SM 4500H+B		SM 4500-Cl D					
Start Date		pH		TRC		DO		Temp	
		su		mg/l		mg/l		deg C	
Start Time		Date		Date		Date		Date	
Stop Date		Time		Time		Time		Time	
Stop Time		Analyst		Analyst		Analyst		Analyst	

**SAMPLE TEMPERATURE RECEIVED @** \_\_\_\_\_

RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME	RELINQUISHED BY: (SIGNATURE)		DATE	TIME
		10-18-21	12:00			10-18-21	2:35				
RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME	RECEIVED BY: (SIGNATURE)		DATE	TIME
		10-18-21	12:00								
RECEIVED FOR LABORATORY USE BY: (SIGNATURE)				DATE	TIME	SAMPLE STATUS:					
				10/18/21	1435	<input type="checkbox"/> Accepted <input type="checkbox"/> Rejected <input type="checkbox"/> Accepted with Exception					

SET-001-FLD REV. 0

Description of Pathogen Reduction  
Alternative and Vector Attraction Reduction  
Option Certification

## Certification

"I certify, under penalty of law, that the information that will be used to determine compliance with the Class B pathogen requirements in §503.32(b) and the vector attraction reduction requirement in §503.33(b)(1) was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

Project(s): West River WWTP, Gadsden, AL  
Reporting Period: January - December 2021  
Name: Mike Lankford Title: Assistant General Manager

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

The Class B pathogen requirements were met through §503.32(b)(2). Seven samples of the biosolids were collected at the time of biosolids use and the geometric mean of the density of fecal coliform in the samples was less than 2,000,000 MPN or CFU per gram of total solids (dry weight basis).

The vector attraction reduction requirement was met through §503.33(b)(1). The mass of volatile solids in the biosolids was reduced by a minimum of 38 percent.

## Vector Attraction Reduction Data



**From:** [Mike Lankford](#)  
**To:** [Jeff Retzke](#)  
**Subject:** [EXT]VS Reduction  
**Date:** Friday, May 7, 2021 1:19:52 PM

---

Jeff,

For the first quarter of 2021, the plants had the following average reduction(s):

Gadsden West River WWTP – 43%

Gadsden East River WWTP – 39%

Thanks.

Be Blessed,

*Mike Lankford*, Superintendent of Environmental Services

**The Water Works & Sewer Board of the City of Gadsden, AL**

**515 Albert Rains Blvd.**

**P. O. Box 800**

**Gadsden, AL. 35901**

**(W) (256) 543-2884 ext. 223**

**(F) (256) 543-7704**

**[www.gadsdenwater.org](http://www.gadsdenwater.org)**

**[EXTERNAL EMAIL]** This email is not from a Denali Water employee using an @denaliwater.com email address. **DO NOT CLICK** links or open attachments unless you recognize the sender and email address and know the content is safe.

**From:** [Mike Lankford](#)  
**To:** [Jeff Retzke](#)  
**Subject:** RE: [EXT]Question  
**Date:** Wednesday, June 30, 2021 8:23:24 AM  
**Attachments:** [image004.png](#)

---

Jeff,

Sorry for the delay. We have had a few things come up. Here are the VS reduction percentages:

	West	East
April	39%	43%
May	39%	38%
June	40%	39%

Thanks.

Be Blessed,

*Mike Lankford*, Superintendent of Environmental Services

**The Water Works & Sewer Board of the City of Gadsden, AL**

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---

**From:** Jeff Retzke [mailto:[jeff.retzke@denaliwater.com](mailto:jeff.retzke@denaliwater.com)]  
**Sent:** Tuesday, June 29, 2021 11:09 AM  
**To:** Mike Lankford  
**Subject:** RE: [EXT]Question

Good Tuesday Mike,

Just following up in regards to the volatile solids reduction data from this past quarter. Thanks,

Jeff

**Jeff Retzke**

**Senior Environmental Manager**

3308 Bernice Avenue, Russellville, AR 72802

Cell 256.503.4300

[jeff.retzke@denaliwater.com](mailto:jeff.retzke@denaliwater.com)

## Jeff Retzke

---

**From:** Mike Lankford <mlankford@gadsdenwater.org>  
**Sent:** Wednesday, August 25, 2021 10:09 AM  
**To:** Jeff Retzke  
**Subject:** RE: [EXT]Question

Good Morning Jeff.

West Plant  
July – 40%  
August – 41%

East Plant  
July – 41%  
August – 39%

Thanks.

Be Blessed,

*Mike Lankford*, Superintendent of Environmental Services

The Water Works & Sewer Board of the City of Gadsden, AL  
515 Albert Rains Blvd.

P. O. Box 800

Gadsden, AL. 35901

(W) (256) 543-2884 ext. 223

(F) (256) 543-7704

[www.gadsdenwater.org](http://www.gadsdenwater.org)



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**From:** Jeff Retzke [mailto:jeff.retzke@denaliwater.com]  
**Sent:** Wednesday, August 25, 2021 9:02 AM  
**To:** Mike Lankford  
**Subject:** RE: [EXT]Question

Good morning Mike,

Would you mind forwarding the volatile solids reduction for July and August? Thanks in advance.

Jeff

**Jeff Retzke**

**Senior Environmental Manager**

3308 Bernice Avenue, Russellville, AR 72802

Cell 256.503.4300

[jeff.retzke@denaliwater.com](mailto:jeff.retzke@denaliwater.com)

**From:** [Mike Lankford](#)  
**To:** [Jeff Retzke](#)  
**Subject:** [EXT]RE: Volatile Solid Reduction - 4th Period 2021  
**Date:** Friday, January 28, 2022 2:01:23 PM  
**Attachments:** [image004.png](#)

---

Jeff,

Things are going pretty well, thank you. The VS Reductions are:

East

October – 39%

November – 41%

December – 40%

West

October – 41%

November – 39%

December – 43%

Be Blessed,

*Mike Lankford*, Assistant General Manager/Superintendent of Environmental Services  
**The Water Works & Sewer Board of the City of Gadsden, AL**  
**515 Albert Rains Blvd.**  
**P. O. Box 800**  
**Gadsden, AL. 35901**  
**(W) (256) 543-2884 ext. 223**  
**(F) (256) 543-7704**  
[www.gadsdenwater.org](http://www.gadsdenwater.org)

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**From:** Jeff Retzke [mailto:[jeff.retzke@denaliwater.com](mailto:jeff.retzke@denaliwater.com)]  
**Sent:** Friday, January 28, 2022 6:08 AM  
**To:** mike lankford ([mlankford@gadsdenwater.org](mailto:mlankford@gadsdenwater.org))  
**Cc:** Recyc LLC Boaz, AL  
**Subject:** Volatile Solid Reduction - 4th Period 2021

Good morning Mike,

I hope all is well over there in Gadsden. Would you please forward Gadsden's volatile solid reduction data for the 4<sup>th</sup> Period (Oct/Nov/Dec) of last year? We'll need it for your annual reporting.

Thanks in advance.

jeff

**Jeff Retzke**  
**Senior Environmental Manager**

## Field Loadings



**Source: West River-Gadsden, AL WWTP**

Landowner	Field No	Acres	Crop	Dry Tons	Dry Tons	N (lb/ac)	P (lb/ac)	K (lb/ac)	Concentration of Pollutants (lb/ac)									
				Applied	Applied/Acre				As	Cd	Cr	Cu	Pb	Hg	Mo	Ni	Se	Zn
Dennis Burton, Sr	AL-BL-DB-1	75	Bermuda	283.31	3.79	36.43	190.79	5.53	0.0384	0.0214	0.4152	1.9364	1.3096	0.0049	0.0999	0.1634	0.0340	10.9526
Dennis Burton, Sr	AL-BL-DB-3	52	Bermuda	17.75	0.34	4.43	17.79	0.37	0.0037	0.0018	0.0354	0.1614	0.1198	0.0003	0.0050	0.0116	0.0015	1.0004
Dennis Burton, Sr	AL-BL-DB-4	41	Bermuda	6.49	0.16	2.50	8.40	0.17	0.0020	0.0008	0.0169	0.0734	0.0571	0.0001	0.0017	0.0053	0.0004	0.4713
Dennis Burton, Sr	AL-BL-DB-5	55	ida/Winter Gra	56.26	1.02	15.07	53.40	1.07	0.0122	0.0052	0.1069	0.4724	0.3618	0.0008	0.0122	0.0341	0.0032	2.9987
Majestik, LLC Nic Corn	AL-JA-NC-3	34	Fescue	9.18	0.27	2.96	13.81	0.44	0.0021	0.0019	0.0314	0.1277	0.0767	0.0002	0.0079	0.0113	0.0023	0.7069
Majestik, LLC Nic Corn	AL-JA-NC-5	16	Fescue	8.14	0.50	5.37	25.01	0.79	0.0039	0.0035	0.0569	0.2313	0.1390	0.0004	0.0144	0.0204	0.0041	1.2804
Bobby Turner	AL-MR-BT-2	5	eat/Soybeans	5.66	1.07	16.66	56.00	1.11	0.0133	0.0054	0.1124	0.4895	0.3805	0.0007	0.0113	0.0355	0.0027	3.1421
				531.18														

\* 531.18 Dry Short Tons = 481.78 Dry Metric Tons

Denali Water Solutions  
2021 Land Applier  
Certification Statements

## Certification

"I certify, under penalty of law, that the information that will be used to determine compliance with the management practices in §503.14 and the site restrictions in §503.32(b)(5) was prepared for each site on which bulk sewage sludge was applied under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

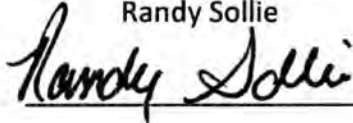
Project(s): West River WWTP

Reporting Period: January - December 2021

Name: Randy Sollie

Denali Water

Signature:




Date: 2/3/2022

The management practices were met as follows:

- (a) Sites currently in agricultural production or drastically disturbed lands are not potential habitat for endangered species. Sites which are in a natural state and are converted to agricultural use are evaluated case by case.
- (b),(c) Biosolids are applied under management conditions to prevent the movement of biosolids into wetlands or other waters of the United States. These management practices include adherence to slope restrictions, seasonal water table restrictions, floodplain restrictions, frozen and snow covered soil restrictions, and maintaining buffer zones to surface waters (including the 10 meter set back to waters of the United States unless a reduced buffer zone requirement has been approved by the permitting authority) as required by state and internal operating standards.
- (d) Biosolids are applied at agronomic rates based on regional, state, and local crop nitrogen requirements. Reclamation rates are established directly with the permitting authority.

The site restrictions were met through written agreements with the landowner and/or farm operator (leaseholder) specifying their obligation to comply with the site restrictions.

JUL 14 2022

EPA Identification Number 100000033894		NPDES Permit Number AL0053201		Facility Name Gadsden West River WWTP		Form Approved 03/05/19 OMB No. 2040-0004	
Form 2A NPDES				<b>U.S. Environmental Protection Agency</b> <b>Application for NPDES Permit to Discharge Wastewater</b> <b>NEW AND EXISTING PUBLICLY OWNED TREATMENT WORKS</b>			
<b>SECTION 1. BASIC APPLICATION INFORMATION FOR ALL APPLICANTS (40 CFR 122.21(j)(1) and (9))</b>							
Facility Information	1.1	Facility name Gadsden West River WWTP					
		Mailing address (street or P.O. box) P.O. Box 800					
		City or town Gadsden			State AL		ZIP code 35905-0800
		Contact name (first and last) Mike Lankford	Title AGM/Supt. of Env. Services		Phone number (256) 543-2884	Email address mlankford@gadsdenwater.org	
		Location address (street, route number, or other specific identifier) <input type="checkbox"/> Same as mailing address 2000 Wills Creek Road					
		City or town Gadsden			State AL		ZIP code 35904
	1.2	Is this application for a facility that has yet to commence discharge? <input type="checkbox"/> Yes → See instructions on data submission requirements for new dischargers. <input checked="" type="checkbox"/> No					
Applicant Information	1.3	Is applicant different from entity listed under Item 1.1 above? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 1.4.					
		Applicant name					
		Applicant address (street or P.O. box)					
		City or town			State		ZIP code
		Contact name (first and last)	Title		Phone number	Email address	
	1.4	Is the applicant the facility's owner, operator, or both? (Check only one response.) <input type="checkbox"/> Owner <input type="checkbox"/> Operator <input checked="" type="checkbox"/> Both					
1.5	To which entity should the NPDES permitting authority send correspondence? (Check only one response.) <input type="checkbox"/> Facility <input type="checkbox"/> Applicant <input checked="" type="checkbox"/> Facility and applicant (they are one and the same)						
Existing Environmental Permits	1.6	Indicate below any existing environmental permits. (Check all that apply and print or type the corresponding permit number for each.)					
		<b>Existing Environmental Permits</b>					
		<input checked="" type="checkbox"/> NPDES (discharges to surface water) AL0053201	<input type="checkbox"/> RCRA (hazardous waste)		<input type="checkbox"/> UIC (underground injection control)		
		<input type="checkbox"/> PSD (air emissions)	<input type="checkbox"/> Nonattainment program (CAA)		<input type="checkbox"/> NESHAPs (CAA)		
		<input type="checkbox"/> Ocean dumping (MPRSA)	<input type="checkbox"/> Dredge or fill (CWA Section 404)		<input type="checkbox"/> Other (specify)		



EPA Identification Number 100000033894		NPDES Permit Number AL0053201		Facility Name Gadsden West River WWTP		Form Approved 03/05/19 OMB No. 2040-0004	
Collection System and Population Served	1.7	Provide the collection system information requested below for the treatment works.					
		<b>Municipality Served</b>	<b>Population Served</b>	<b>Collection System Type</b> (indicate percentage)		<b>Ownership Status</b>	
		Gadsden (West)	20,000	<u>100</u> ____ <input type="checkbox"/>	% separate sanitary sewer % combined storm and sanitary sewer Unknown	<input checked="" type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input checked="" type="checkbox"/> Maintain <input type="checkbox"/> Maintain <input type="checkbox"/> Maintain
				____ ____ <input type="checkbox"/>	% separate sanitary sewer % combined storm and sanitary sewer Unknown	<input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input type="checkbox"/> Maintain <input type="checkbox"/> Maintain <input type="checkbox"/> Maintain
				____ ____ <input type="checkbox"/>	% separate sanitary sewer % combined storm and sanitary sewer Unknown	<input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input type="checkbox"/> Maintain <input type="checkbox"/> Maintain <input type="checkbox"/> Maintain
				____ ____ <input type="checkbox"/>	% separate sanitary sewer % combined storm and sanitary sewer Unknown	<input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input type="checkbox"/> Maintain <input type="checkbox"/> Maintain <input type="checkbox"/> Maintain
				____ ____ <input type="checkbox"/>	% separate sanitary sewer % combined storm and sanitary sewer Unknown	<input type="checkbox"/> Own <input type="checkbox"/> Own <input type="checkbox"/> Own	<input type="checkbox"/> Maintain <input type="checkbox"/> Maintain <input type="checkbox"/> Maintain
		<b>Total Population Served</b>	20,000				
				<b>Separate Sanitary Sewer System</b>		<b>Combined Storm and Sanitary Sewer</b>	
		Total percentage of each type of sewer line (in miles)		100 %		0 %	
Indian Country	1.8	Is the treatment works located in Indian Country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
	1.9	Does the facility discharge to a receiving water that flows through Indian Country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No					
Design and Actual Flow Rates	1.10	Provide design <i>and</i> actual flow rates in the designated spaces.				<b>Design Flow Rate</b>	
						11.320 mgd	
		<b>Annual Average Flow Rates (Actual)</b>					
		<b>Two Years Ago</b>		<b>Last Year</b>		<b>This Year</b>	
		8.007 mgd		7.189 mgd		7.392 mgd	
		<b>Maximum Daily Flow Rates (Actual)</b>					
		<b>Two Years Ago</b>		<b>Last Year</b>		<b>This Year</b>	
	21.461 mgd		21.017 mgd		17.844 mgd		
Discharge Points by Type	1.11	Provide the total number of effluent discharge points to waters of the United States by type.					
		<b>Total Number of Effluent Discharge Points by Type</b>					
		<b>Treated Effluent</b>	<b>Untreated Effluent</b>	<b>Combined Sewer Overflows</b>	<b>Bypasses</b>	<b>Constructed Emergency Overflows</b>	
	1						



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<b>Outfalls and Other Discharge or Disposal Methods</b>	<b>Outfalls Other Than to Waters of the United States</b>			
	1.12	Does the POTW discharge wastewater to basins, ponds, or other surface impoundments that do not have outlets for discharge to waters of the United States? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 1.14.		
	1.13	Provide the location of each surface impoundment and associated discharge information in the table below.		
	<b>Surface Impoundment Location and Discharge Data</b>			
		Location	Average Daily Volume Discharged to Surface Impoundment	Continuous or Intermittent (check one)
			gpd	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
			gpd	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
			gpd	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent
	1.14	Is wastewater applied to land? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 1.16.		
	1.15	Provide the land application site and discharge data requested below.		
	<b>Land Application Site and Discharge Data</b>			
		Location	Size	Average Daily Volume Applied
			acres	gpd
			acres	gpd
			acres	gpd
1.16	Is effluent transported to another facility for treatment prior to discharge? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 1.21.			
1.17	Describe the means by which the effluent is transported (e.g., tank truck, pipe).			
1.18	Is the effluent transported by a party other than the applicant? <input type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 1.20.			
1.19	Provide information on the transporter below.			
<b>Transporter Data</b>				
Entity name		Mailing address (street or P.O. box)		
City or town		State	ZIP code	
Contact name (first and last)		Title		
Phone number		Email address		

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<b>Outfalls and Other Discharge or Disposal Methods Continued</b>	1.20	In the table below, indicate the name, address, contact information, NPDES number, and average daily flow rate of the receiving facility.			
	<b>Receiving Facility Data</b>				
	Facility name			Mailing address (street or P.O. box)	
	City or town			State	ZIP code
	Contact name (first and last)			Title	
	Phone number			Email address	
	NPDES number of receiving facility (if any) <input type="checkbox"/> None			Average daily flow rate mgd	
	1.21	Is the wastewater disposed of in a manner other than those already mentioned in Items 1.14 through 1.21 that do not have outlets to waters of the United States (e.g., underground percolation, underground injection)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 1.23.			
	1.22	Provide information in the table below on these other disposal methods.			
	<b>Information on Other Disposal Methods</b>				
	<b>Disposal Method Description</b>	<b>Location of Disposal Site</b>	<b>Size of Disposal Site</b>	<b>Annual Average Daily Discharge Volume</b>	<b>Continuous or Intermittent (check one)</b>
		acres	gpd	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	
		acres	gpd	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	
		acres	gpd	<input type="checkbox"/> Continuous <input type="checkbox"/> Intermittent	

<b>Variance Requests</b>	1.23	Do you intend to request or renew one or more of the variances authorized at 40 CFR 122.21(n)? (Check all that apply. Consult with your NPDES permitting authority to determine what information needs to be submitted and when.) <input type="checkbox"/> Discharges into marine waters (CWA Section 301(h)) <input type="checkbox"/> Water quality related effluent limitation (CWA Section 302(b)(2)) <input checked="" type="checkbox"/> Not applicable
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<b>Contractor Information</b>	1.24	Are any operational or maintenance aspects (related to wastewater treatment and effluent quality) of the treatment works the responsibility of a contractor? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Section 2.			
	1.25	Provide location and contact information for each contractor in addition to a description of the contractor's operational and maintenance responsibilities.			
	<b>Contractor Information</b>				
		<b>Contractor 1</b>	<b>Contractor 2</b>	<b>Contractor 3</b>	
	Contractor name (company name)				
	Mailing address (street or P.O. box)				
	City, state, and ZIP code				
	Contact name (first and last)				
	Phone number				
	Email address				
Operational and maintenance responsibilities of contractor					



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**SECTION 2. ADDITIONAL INFORMATION (40 CFR 122.21(j)(1) and (2))**

<b>Design Flow</b>	<b>Outfalls to Waters of the United States</b>						
	2.1	Does the treatment works have a design flow greater than or equal to 0.1 mgd? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Section 3.					
<b>Inflow and Infiltration</b>	2.2	Provide the treatment works' current average daily volume of inflow and infiltration.				<b>Average Daily Volume of Inflow and Infiltration</b> ~500000 gpd	
	Indicate the steps the facility is taking to minimize inflow and infiltration. Collection system is maintained on a daily basis by Gadsden Water personnel, utilizing two (2) jet/vac trucks, one (1) camera van, along with construction personnel & equipment when necessary. Gadsden Water also has outside consultants contracted for flow monitoring, pipe assessments, and manhole inspections. Contracts for sewer rehabilitation by pipe bursting, cured-in-place pipe, and manhole rehabilitation are also active.						
<b>Topographic Map</b>	2.3	Have you attached a topographic map to this application that contains all the required information? (See instructions for specific requirements.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
<b>Flow Diagram</b>	2.4	Have you attached a process flow diagram or schematic to this application that contains all the required information? (See instructions for specific requirements.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
<b>Scheduled Improvements and Schedules of Implementation</b>	2.5	Are improvements to the facility scheduled? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Section 3.					
	Briefly list and describe the scheduled improvements.						
	1. <span style="float: right;">RECEIVED</span>						
	2. <span style="float: right;">FEB 17 2023</span>						
	3. <span style="float: right;">MUNICIPAL SECTION</span>						
	4.						
	2.6	Provide scheduled or actual dates of completion for improvements.					
	<b>Scheduled or Actual Dates of Completion for Improvements</b>						
		<b>Scheduled Improvement (from above)</b>	<b>Affected Outfalls (list outfall number)</b>	<b>Begin Construction (MM/DD/YYYY)</b>	<b>End Construction (MM/DD/YYYY)</b>	<b>Begin Discharge (MM/DD/YYYY)</b>	<b>Attainment of Operational Level (MM/DD/YYYY)</b>
		1.					
	2.						
	3.						
	4.						
2.7	Have appropriate permits/clearances concerning other federal/state requirements been obtained? Briefly explain your response. <input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> None required or applicable						
Explanation:							

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SECTION 3. INFORMATION ON EFFLUENT DISCHARGES (40 CFR 122.21(j)(3) to (5))

Description of Outfalls	3.1	Provide the following information for each outfall. (Attach additional sheets if you have more than three outfalls.)		
		Outfall Number <u>001</u>	Outfall Number _____	Outfall Number _____
	State	Alabama		
	County	Etowah		
	City or town	Gadsden		
	Distance from shore	235 ft.	ft.	ft.
	Depth below surface	30 ft.	ft.	ft.
	Average daily flow rate	7.529 mgd	mgd	mgd
	Latitude	33° 58' 53"	° ' "	° ' "
	Longitude	-86° 00' 00"	° ' "	° ' "
Seasonal or Periodic Discharge Data	3.2	Do any of the outfalls described under Item 3.1 have seasonal or periodic discharges? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 3.4.		
	3.3	If so, provide the following information for each applicable outfall.		
		Outfall Number _____	Outfall Number _____	Outfall Number _____
	Number of times per year discharge occurs			
	Average duration of each discharge (specify units)			
	Average flow of each discharge	mgd	mgd	mgd
Months in which discharge occurs				
Diffuser Type	3.4	Are any of the outfalls listed under Item 3.1 equipped with a diffuser? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 3.6.		
	3.5	Briefly describe the diffuser type at each applicable outfall.		
		Outfall Number <u>001</u>	Outfall Number _____	Outfall Number _____
		48" discharge line to diffuser.		
Waters of the U.S.	3.6	Does the treatment works discharge or plan to discharge wastewater to waters of the United States from one or more discharge points? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Section 6.		



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Receiving Water Description	3.7	Provide the receiving water and related information (if known) for each outfall.					
		Outfall Number <u>001</u>		Outfall Number _____		Outfall Number _____	
	Receiving water name	Coosa River					
	Name of watershed, river, or stream system	Middle Coosa (Neely Henry La					
	U.S. Soil Conservation Service 14-digit watershed code						
	Name of state management/river basin						
	U.S. Geological Survey 8-digit hydrologic cataloging unit code	03150106					
	Critical low flow (acute)	cfs		cfs		cfs	
	Critical low flow (chronic)	1140 cfs		cfs		cfs	
	Total hardness at critical low flow	N/A mg/L of CaCO <sub>3</sub>		mg/L of CaCO <sub>3</sub>		mg/L of CaCO <sub>3</sub>	
	Treatment Description	3.8	Provide the following information describing the treatment provided for discharges from each outfall.				
		Outfall Number <u>001</u>		Outfall Number _____		Outfall Number _____	
Highest Level of Treatment (check all that apply per outfall)		<input checked="" type="checkbox"/> Primary <input type="checkbox"/> Equivalent to secondary <input checked="" type="checkbox"/> Secondary <input type="checkbox"/> Advanced <input type="checkbox"/> Other (specify) _____		<input type="checkbox"/> Primary <input type="checkbox"/> Equivalent to secondary <input type="checkbox"/> Secondary <input type="checkbox"/> Advanced <input type="checkbox"/> Other (specify) _____		<input type="checkbox"/> Primary <input type="checkbox"/> Equivalent to secondary <input type="checkbox"/> Secondary <input type="checkbox"/> Advanced <input type="checkbox"/> Other (specify) _____	
Design Removal Rates by Outfall							
BOD <sub>5</sub> or CBOD <sub>5</sub>		65 %		%		%	
TSS		65 %		%		%	
Phosphorus		<input checked="" type="checkbox"/> Not applicable %		<input type="checkbox"/> Not applicable %		<input type="checkbox"/> Not applicable %	
Nitrogen		<input checked="" type="checkbox"/> Not applicable %		<input type="checkbox"/> Not applicable %		<input type="checkbox"/> Not applicable %	
Other (specify) _____		<input type="checkbox"/> Not applicable %		<input type="checkbox"/> Not applicable %		<input type="checkbox"/> Not applicable %	



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Treatment Description Continued	3.9	Describe the type of disinfection used for the effluent from each outfall in the table below. If disinfection varies by season, describe below. Disinfection process includes: gaseous chlorine injected post final clarifiers, followed by chlorine contact chamber, which provides contact time.					
		Outfall Number <u>001</u>		Outfall Number _____		Outfall Number _____	
	Disinfection type	Gaseous Chlorination					
	Seasons used	ALL					
	Dechlorination used?	<input type="checkbox"/> Not applicable <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input type="checkbox"/> Not applicable <input type="checkbox"/> Yes <input type="checkbox"/> No		<input type="checkbox"/> Not applicable <input type="checkbox"/> Yes <input type="checkbox"/> No	
Effluent Testing Data	3.10	Have you completed monitoring for all Table A parameters and attached the results to the application package? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
	3.11	Have you conducted any WET tests during the 4.5 years prior to the date of the application on any of the facility's discharges or on any receiving water near the discharge points? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 3.13.					
	3.12	Indicate the number of acute and chronic WET tests conducted since the last permit reissuance of the facility's discharges by outfall number or of the receiving water near the discharge points.					
		Outfall Number <u>001</u>		Outfall Number _____		Outfall Number _____	
		Acute	Chronic	Acute	Chronic	Acute	Chronic
	Number of tests of discharge water		4				
	Number of tests of receiving water		4				
	3.13	Does the treatment works have a design flow greater than or equal to 0.1 mgd? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 3.16.					
	3.14	Does the POTW use chlorine for disinfection, use chlorine elsewhere in the treatment process, or otherwise have reasonable potential to discharge chlorine in its effluent? <input checked="" type="checkbox"/> Yes → Complete Table B, including chlorine. <input type="checkbox"/> No → Complete Table B, omitting chlorine.					
	3.15	Have you completed monitoring for all applicable Table B pollutants and attached the results to this application package? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No					
3.16	Does one or more of the following conditions apply? <ul style="list-style-type: none"> <li>The facility has a design flow greater than or equal to 1 mgd.</li> <li>The POTW has an approved pretreatment program or is required to develop such a program.</li> <li>The NPDES permitting authority has informed the POTW that it must sample for the parameters in Table C, must sample other additional parameters (Table D), or submit the results of WET tests for acute or chronic toxicity for each of its discharge outfalls (Table E).</li> </ul> <input checked="" type="checkbox"/> Yes → Complete Tables C, D, and E as applicable. <input type="checkbox"/> No → SKIP to Section 4.						
3.17	Have you completed monitoring for all applicable Table C pollutants and attached the results to this application package? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No						
3.18	Have you completed monitoring for all applicable Table D pollutants required by your NPDES permitting authority and attached the results to this application package? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No additional sampling required by NPDES permitting authority.						

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<b>Effluent Testing Data Continued</b>	3.19	Has the POTW conducted either (1) minimum of four quarterly WET tests for one year preceding this permit application or (2) at least four annual WET tests in the past 4.5 years? <input checked="" type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> No → Complete tests and Table E and SKIP to Item 3.26.</span>										
	3.20	Have you previously submitted the results of the above tests to your NPDES permitting authority? <input checked="" type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> No → Provide results in Table E and SKIP to Item 3.26.</span>										
	3.21	Indicate the dates the data were submitted to your NPDES permitting authority and provide a summary of the results.										
		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th style="width:40%;">Date(s) Submitted (MM/DD/YYYY)</th> <th>Summary of Results</th> </tr> <tr> <td>08/21/2018</td> <td>No toxicity indicated</td> </tr> <tr> <td>08/27/2019</td> <td>No toxicity indicated</td> </tr> <tr> <td>09/01/2020</td> <td>No toxicity indicated</td> </tr> <tr> <td>08/31/2021</td> <td>No toxicity indicated</td> </tr> </table>	Date(s) Submitted (MM/DD/YYYY)	Summary of Results	08/21/2018	No toxicity indicated	08/27/2019	No toxicity indicated	09/01/2020	No toxicity indicated	08/31/2021	No toxicity indicated
	Date(s) Submitted (MM/DD/YYYY)	Summary of Results										
	08/21/2018	No toxicity indicated										
	08/27/2019	No toxicity indicated										
	09/01/2020	No toxicity indicated										
08/31/2021	No toxicity indicated											
3.22	Regardless of how you provided your WET testing data to the NPDES permitting authority, did any of the tests result in toxicity? <input type="checkbox"/> Yes <span style="float: right;"><input checked="" type="checkbox"/> No → SKIP to Item 3.26.</span>											
3.23	Describe the cause(s) of the toxicity:											
3.24	Has the treatment works conducted a toxicity reduction evaluation? <input type="checkbox"/> Yes <span style="float: right;"><input checked="" type="checkbox"/> No → SKIP to Item 3.26.</span>											
3.25	Provide details of any toxicity reduction evaluations conducted.											
3.26	Have you completed Table E for all applicable outfalls and attached the results to the application package? <input checked="" type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> Not applicable because previously submitted information to the NPDES permitting authority.</span>											

SECTION 4. INDUSTRIAL DISCHARGES AND HAZARDOUS WASTES (40 CFR 122.21(j)(6) and (7))						
<b>Industrial Discharges and Hazardous Wastes</b>	4.1	Does the POTW receive discharges from SIUs or NSCIUs? <input checked="" type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> No → SKIP to Item 4.7.</span>				
	4.2	Indicate the number of SIUs and NSCIUs that discharge to the POTW.				
		<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <th style="width:50%;">Number of SIUs</th> <th>Number of NSCIUs</th> </tr> <tr> <td style="text-align: center;">4</td> <td style="text-align: center;">2</td> </tr> </table>	Number of SIUs	Number of NSCIUs	4	2
	Number of SIUs	Number of NSCIUs				
	4	2				
	4.3	Does the POTW have an approved pretreatment program? <input checked="" type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> No</span>				
4.4	Have you submitted either of the following to the NPDES permitting authority that contains information substantially identical to that required in Table F: (1) a pretreatment program annual report submitted within one year of the application or (2) a pretreatment program? <input type="checkbox"/> Yes <span style="float: right;"><input checked="" type="checkbox"/> No → SKIP to Item 4.6.</span>					
4.5	Identify the title and date of the annual report or pretreatment program referenced in Item 4.4. SKIP to Item 4.7.					
4.6	Have you completed and attached Table F to this application package? <input checked="" type="checkbox"/> Yes <span style="float: right;"><input type="checkbox"/> No</span>					



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CSO Outfall Description	5.4	For each CSO outfall, provide the following information. (Attach additional sheets as necessary.)					
			CSO Outfall Number ____	CSO Outfall Number ____	CSO Outfall Number ____		
	City or town						
	State and ZIP code						
	County						
	Latitude	° ' "	° ' "	° ' "	° ' "		
	Longitude	° ' "	° ' "	° ' "	° ' "		
	Distance from shore		ft.		ft.		ft.
	Depth below surface		ft.		ft.		ft.
CSO Monitoring	5.5	Did the POTW monitor any of the following items in the past year for its CSO outfalls?					
			CSO Outfall Number ____	CSO Outfall Number ____	CSO Outfall Number ____		
	Rainfall		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	CSO flow volume		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	CSO pollutant concentrations		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Receiving water quality		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	CSO frequency		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
	Number of storm events		<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	
CSO Events in Past Year	5.6	Provide the following information for each of your CSO outfalls.					
			CSO Outfall Number ____	CSO Outfall Number ____	CSO Outfall Number ____		
	Number of CSO events in the past year		events	events	events		
	Average duration per event		hours <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated	hours <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated	hours <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated		
	Average volume per event		million gallons <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated	million gallons <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated	million gallons <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated		
	Minimum rainfall causing a CSO event in last year		inches of rainfall <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated	inches of rainfall <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated	inches of rainfall <input type="checkbox"/> Actual or <input type="checkbox"/> Estimated		



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<b>CSO Receiving Waters</b>	5.7	Provide the information in the table below for each of your CSO outfalls.		
		CSO Outfall Number ____	CSO Outfall Number ____	CSO Outfall Number ____
	Receiving water name			
	Name of watershed/ stream system			
	U.S. Soil Conservation Service 14-digit watershed code (if known)	<input type="checkbox"/> Unknown	<input type="checkbox"/> Unknown	<input type="checkbox"/> Unknown
	Name of state management/river basin			
	U.S. Geological Survey 8-Digit Hydrologic Unit Code (if known)	<input type="checkbox"/> Unknown	<input type="checkbox"/> Unknown	<input type="checkbox"/> Unknown
	Description of known water quality impacts on receiving stream by CSO (see instructions for examples)			

**SECTION 6. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))**

<b>Checklist and Certification Statement</b>	6.1	In Column 1 below, mark the sections of Form 2A that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.		
		<b>Column 1</b>	<b>Column 2</b>	
	<input checked="" type="checkbox"/>	Section 1: Basic Application Information for All Applicants	<input type="checkbox"/> w/ variance request(s)	<input type="checkbox"/> w/ additional attachments
	<input checked="" type="checkbox"/>	Section 2: Additional Information	<input checked="" type="checkbox"/> w/ topographic map <input type="checkbox"/> w/ additional attachments	<input checked="" type="checkbox"/> w/ process flow diagram
	<input checked="" type="checkbox"/>	Section 3: Information on Effluent Discharges	<input checked="" type="checkbox"/> w/ Table A <input checked="" type="checkbox"/> w/ Table B <input checked="" type="checkbox"/> w/ Table C	<input checked="" type="checkbox"/> w/ Table D <input checked="" type="checkbox"/> w/ Table E <input type="checkbox"/> w/ additional attachments
	<input checked="" type="checkbox"/>	Section 4: Industrial Discharges and Hazardous Wastes	<input type="checkbox"/> w/ SIU and NSCIU attachments <input type="checkbox"/> w/ additional attachments	<input checked="" type="checkbox"/> w/ Table F
	<input type="checkbox"/>	Section 5: Combined Sewer Overflows	<input type="checkbox"/> w/ CSO map <input type="checkbox"/> w/ CSO system diagram	<input type="checkbox"/> w/ additional attachments
	<input checked="" type="checkbox"/>	Section 6: Checklist and Certification Statement	<input type="checkbox"/> w/ attachments	

6.2	<b>Certification Statement</b>  <i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>		
	Name (print or type first and last name)	Official title	
	Chad Hare	General Manager	
	Signature	Date signed <span style="color: blue;">7/12/2022</span>	

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**TABLE A. EFFLUENT PARAMETERS FOR ALL POTWS**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
Biochemical oxygen demand <input type="checkbox"/> BOD <sub>5</sub> or <input checked="" type="checkbox"/> CBOD <sub>5</sub> (report one)	20.0	mg/L	7.2	mg/L	312	5210-B	0.2 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Fecal coliform <sub>u</sub>	1986	MPN	24.9	MPN	312	9223-B	<1 MPN <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Design flow rate	21.461	MGD	7.529	MGD	1,095		
pH (minimum)	6.26	s.u.					
pH (maximum)	7.74	s.u.					
Temperature (winter)	20.0	Degrees C	14.9	Degrees C	158		
Temperature (summer)	26.8	Degrees C	22.6	Degrees C	162		
Total suspended solids (TSS)	43.0	mg/L	13.3	mg/L	312	2540-D	>1 mg/L <input type="checkbox"/> ML <input checked="" type="checkbox"/> MDL

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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**TABLE B. EFFLUENT PARAMETERS FOR ALL POTWS WITH A FLOW EQUAL TO OR GREATER THAN 0.1 MGD**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
Ammonia (as N)	22.3	mg/L	5.8	mg/L	312	4500NH3BF	0.05 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chlorine (total residual, TRC) <sup>2</sup>	1.0	mg/L	0.70	mg/L	1095	4500-ClG	0.01 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Dissolved oxygen	10.5	mg/L	7.1	mg/L	1,095	4500-OG	0.2 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Nitrate/nitrite	14.5	mg/L	6.5	mg/L	108	300.0	0.10 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Kjeldahl nitrogen	26.8	mg/L	9.9	mg/L	312	4500-NorgB	0.05 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Oil and grease	ND	mg/L	ND	mg/L	3	E1664B	5.0 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Phosphorus	2.0	mg/L	0.88	mg/L	312	4500-PB,5	0.05 mg/L <input type="checkbox"/> ML <input checked="" type="checkbox"/> MDL
Total dissolved solids	520	mg/L	432	mg/L	3	M2540C	10.0 mg/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

<sup>2</sup> Facilities that do not use chlorine for disinfection, do not use chlorine elsewhere in the treatment process, and have no reasonable potential to discharge chlorine in their effluent are not required to report data for chlorine.



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**TABLE C. EFFLUENT PARAMETERS FOR SELECTED POTWS**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
Metals, Cyanide, and Total Phenols							
Hardness (as CaCO <sub>3</sub> )	148	mg/L	138	mg/L	3	E200.8	0.0050 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Antimony, total recoverable	-	mg/l	-	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Arsenic, total recoverable	0.0012	mg/L	0.0008	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Beryllium, total recoverable	-	mg/L	-	mg/L	3	E200.8	0.00050 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Cadmium, total recoverable	-	mg/L	-	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chromium, total recoverable	0.0028	mg/L	0.0023	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Copper, total recoverable	0.0035	mg/L	0.0033	mg/L	3	E200.8	0.0030 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Lead, total recoverable	0.0016	mg/L	0.0013	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Mercury, total recoverable	4.58	ng/L	1.94	ng/L	3	E1631	0.50 ng/l <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Nickel, total recoverable	0.0042	mg/L	0.0034	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Selenium, total recoverable	-	mg/L	-	mg/L	3	E200.8	0.0010 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Silver, total recoverable	-	mg/L	-	mg/L	3	E200.8	0.00050 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Thallium, total recoverable	-	mg/L	-	mg/L	3	E200.8	0.00050 <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Zinc, total recoverable	0.034	mg/L	0.025	mg/L	3	E200.8	0.0050m <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Cyanide	0.0169	mg/L	0.0053	mg/L	3	M4500-CN CE	0.020 m <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Total phenolic compounds	0.0201	mg/L	0.007	mg/L	3	M5330 BD 2005	0.020 m <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Volatile Organic Compounds							
Acrolein	-	ug/L	-	ug/L	3	EPA624	20 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Acrylonitrile	-	ug/l	-	ug/L	3	EPA624	20 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Benzene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Bromoform	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL

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**TABLE C. EFFLUENT PARAMETERS FOR SELECTED POTWS**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
Carbon tetrachloride	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chlorobenzene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chlorodibromomethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chloroethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2-chloroethylvinyl ether	-	ug/L	-	ug/L	3	EPA624	20 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chloroform	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Dichlorobromomethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,1-dichloroethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,2-dichloroethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
trans-1,2-dichloroethylene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,1-dichloroethylene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,2-dichloropropane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,3-dichloropropylene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Ethylbenzene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Methyl bromide	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Methyl chloride	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Methylene chloride	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,1,2,2-tetrachloroethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Tetrachloroethylene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Toluene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,1,1-trichloroethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,1,2-trichloroethane	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL



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**TABLE C. EFFLUENT PARAMETERS FOR SELECTED POTWS**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
Trichloroethylene	-	ug/L	-	ug/L	3	EPA624	5 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Vinyl chloride	-	ug/L	-	ug/L	3	EPA624	2 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
<b>Acid-Extractable Compounds</b>							
p-chloro-m-cresol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2-chlorophenol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2,4-dichlorophenol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2,4-dimethylphenol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
4,6-dinitro-o-cresol	-	ug/L	-	ug/L	3	EPA625	24 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2,4-dinitrophenol	-	ug/L	-	ug/L	3	EPA625	38.4 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2-nitrophenol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
4-nitrophenol	-	ug/L	-	ug/L	3	EPA625	38.4 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Pentachlorophenol	-	ug/L	-	ug/L	3	EPA625	38.4 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Phenol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2,4,6-trichlorophenol	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
<b>Base-Neutral Compounds</b>							
Acenaphthene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Acenaphthylene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Anthracene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Benzidine	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Benzo(a)anthracene	-	ug/L	-	ug/L	3	EPA625	28.8 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Benzo(a)pyrene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
3,4-benzofluoranthene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL



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**TABLE C. EFFLUENT PARAMETERS FOR SELECTED POTWS**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
Benzo(ghi)perylene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Benzo(k)fluoranthene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Bis (2-chloroethoxy) methane	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Bis (2-chloroethyl) ether	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Bis (2-chloroisopropyl) ether	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Bis (2-ethylhexyl) phthalate	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
4-bromophenyl phenyl ether	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Butyl benzyl phthalate	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2-chloronaphthalene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
4-chlorophenyl phenyl ether	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Chrysene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
di-n-butyl phthalate	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
di-n-octyl phthalate	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Dibenzo(a,h)anthracene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,2-dichlorobenzene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,3-dichlorobenzene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,4-dichlorobenzene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
3,3-dichlorobenzidine	-	ug/L	-	ug/L	3	EPA625	19.2 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Diethyl phthalate	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Dimethyl phthalate	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2,4-dinitrotoluene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
2,6-dinitrotoluene	-	ug/L	-	ug/L	3	EPA625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL

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**TABLE C. EFFLUENT PARAMETERS FOR SELECTED POTWS**

Pollutant	Maximum Daily Discharge		Average Daily Discharge			Analytical Method <sup>1</sup>	ML or MDL (include units)
	Value	Units	Value	Units	Number of Samples		
1,2-diphenylhydrazine	<0.050	mg/L	<0.050	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Fluoranthene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Fluorene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Hexachlorobenzene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Hexachlorobutadiene	<0.010	mg/L	<0.010	mg/L	3	E625	19.2 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Hexachlorocyclo-pentadiene	<0.010	mg/L	<0.010	mg/L	3	E625	38.4 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Hexachloroethane	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Indeno(1,2,3-cd)pyrene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Isophorone	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Naphthalene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Nitrobenzene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
N-nitrosodi-n-propylamine	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
N-nitrosodimethylamine	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
N-nitrosodiphenylamine	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Phenanthrene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
Pyrene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL
1,2,4-trichlorobenzene	<0.010	mg/L	<0.010	mg/L	3	E625	9.6 ug/L <input checked="" type="checkbox"/> ML <input type="checkbox"/> MDL

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR Chapter I, Subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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# TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

## Test Information

	Test Number <sup>1</sup>	Test Number <sup>2</sup>	Test Number _____
Test species	Pimephales Promelas	Ceriodaphnia Dubia	
Age at initiation of test	<24 hours	<24 hours (within 8 hours)	
Outfall number	DSN 001	DSN 001	
Date sample collected	08/23/2021	08/23/2021	
Date test started	08/24/2021	08/24/2021	
Duration	7 Days (3 samples; 8/23 - 8/31)	7 Days (3 samples 8/23 - 8/31)	

## Toxicity Test Methods

Test method number	1000.0	1002.0	
Manual title	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	
Edition number and year of publication	Fourth Edition, October 2002	Fourth Edition, October 2002	
Page number(s)	53 - 111	141 - 196	

## Sample Type

Check one:	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input type="checkbox"/> 24-hour composite
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## Sample Location

Check one:	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before disinfection <input type="checkbox"/> After disinfection <input type="checkbox"/> After dechlorination
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## Point in Treatment Process

Describe the point in the treatment process at which the sample was collected for each test.	Plant Effluent	Plant Effluent	RECEIVED  FEB 17 2023  MUNICIPAL SECTION
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## Toxicity Type

Indicate for each test whether the test was performed to assess acute or chronic toxicity, or both. (Check one response.)	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input type="checkbox"/> Chronic <input type="checkbox"/> Both
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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 001	Form Approved 03/05/19 OMB No. 2040-0004
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**TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY**

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
<b>Test Type</b>			
Indicate the type of test performed. (Check one response.)	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through
<b>Source of Dilution Water</b>			
Indicate the source of dilution water. (Check one response.)	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water
If laboratory water, specify type.	20% DMW	20%DMW	
If receiving water, specify source.			
<b>Type of Dilution Water</b>			
Indicate the type of dilution water. If salt water, specify "natural" or type of artificial sea salts or brine used.	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)
<b>Percentage Effluent Used</b>			
Specify the percentage effluent used for all concentrations in the test series.	7.0	7.0	RECEIVED
			FEB 17 2023
			MUNICIPAL SECTION
<b>Parameters Tested</b>			
Check the parameters tested.	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature	<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
		<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen	<input type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
			<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen
<b>Acute Test Results</b>			
Percent survival in 100% effluent	97.5 %	100 %	%
LC <sub>50</sub>			
95% confidence interval	4.5662-5.1158 %	1.0646-1.2291 %	%
Control percent survival	100 %	100 %	%



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 001
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TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY						
The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.						
	Test Number <sup>1</sup>		Test Number <sup>2</sup>		Test Number	
<b>Acute Test Results Continued</b>						
Other (describe)						
<b>Chronic Test Results</b>						
NOEC						
IC <sub>25</sub>						
Control percent survival	100 %		100.0 %			
Other (describe)	Pass		Pass			
<b>Quality Control/Quality Assurance</b>						
Is reference toxicant data available?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was reference toxicant test within acceptable bounds?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
What date was reference toxicant test run (MM/DD/YYYY)?	08/17/2021		08/17/2021			
Other (describe)						

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# **TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY**

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

## **Test Information**

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
Test species	Pimephales Promelas	Ceriodaphnia Dubia	
Age at initiation of test	<24 hours	<24 hours (within 8 hours)	
Outfall number	DSN 001	DSN 001	
Date sample collected	08/24/2020	08/24/2020	
Date test started	08/25/2020	08/25/2020	
Duration	7 Days (3 samples; 8/25 - 9/1)	7 Days (3 samples 8/25 - 9/1)	

## **Toxicity Test Methods**

Test method number	1000.0	1002.0	
Manual title	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	
Edition number and year of publication	Fourth Edition, October 2002	Fourth Edition, October 2002	
Page number(s)	53 - 111	141 - 196	

## **Sample Type**

Check one:	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input type="checkbox"/> 24-hour composite
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## **Sample Location**

Check one:	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before disinfection <input type="checkbox"/> After disinfection <input type="checkbox"/> After dechlorination
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## **Point in Treatment Process**

Describe the point in the treatment process at which the sample was collected for each test.	Plant Effluent	Plant Effluent	RECEIVED  FEB 17 2023  MUNICIPAL SECTION
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## **Toxicity Type**

Indicate for each test whether the test was performed to assess acute or chronic toxicity, or both. (Check one response.)	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input type="checkbox"/> Chronic <input type="checkbox"/> Both
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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 001
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# TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
<b>Test Type</b>			
Indicate the type of test performed. (Check one response.)	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through
<b>Source of Dilution Water</b>			
Indicate the source of dilution water. (Check one response.)	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water
If laboratory water, specify type.	20% DMW	20%DMW	
If receiving water, specify source.			
<b>Type of Dilution Water</b>			
Indicate the type of dilution water. If salt water, specify "natural" or type of artificial sea salts or brine used.	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)
<b>Percentage Effluent Used</b>			
Specify the percentage effluent used for all concentrations in the test series.	7.0	7.0	
<b>Parameters Tested</b>			
Check the parameters tested.	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature	<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
			<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen
			<input type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
			<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen
<b>Acute Test Results</b>			
Percent survival in 100% effluent	100 %	100 %	%
LC <sub>50</sub>			
95% confidence interval	4.7992-5.1205 %	1.1240-1.2291 %	%
Control percent survival	97.5 %	100 %	%

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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 001
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TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY						
The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.						
	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____			
<b>Acute Test Results Continued</b>						
Other (describe)						
<b>Chronic Test Results</b>						
NOEC		%		%		
IC <sub>25</sub>		%		%		
Control percent survival		97.5 %		100.0 %		
Other (describe)	Pass		Pass			
<b>Quality Control/Quality Assurance</b>						
Is reference toxicant data available?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was reference toxicant test within acceptable bounds?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
What date was reference toxicant test run (MM/DD/YYYY)?	09/01/2020		09/01/2020			
Other (describe)						

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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 001
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# **TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY**

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

## **Test Information**

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
Test species	Pimephales Promelas	Ceriodaphnia Dubia	
Age at initiation of test	<24 hours	<24 hours (within 8 hours)	
Outfall number	DSN 001	DSN 001	
Date sample collected	08/19/2019	08/19/2019	
Date test started	08/20/2019	08/20/2019	
Duration	7 Days (3 samples; 8/20 - 8/27)	7 Days (3 samples 8/20 - 8/27)	

## **Toxicity Test Methods**

Test method number	1000.0	1002.0	
Manual title	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	
Edition number and year of publication	Fourth Edition, October 2002	Fourth Edition, October 2002	
Page number(s)	53 - 111	141 - 196	

## **Sample Type**

Check one:	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input type="checkbox"/> 24-hour composite
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## **Sample Location**

Check one:	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before disinfection <input type="checkbox"/> After disinfection <input type="checkbox"/> After dechlorination
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## **Point in Treatment Process**

Describe the point in the treatment process at which the sample was collected for each test.	Plant Effluent	Plant Effluent	<p>RECEIVED</p> <p>FEB 17 2023</p> <p>MUNICIPAL SECTION</p>
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## **Toxicity Type**

Indicate for each test whether the test was performed to assess acute or chronic toxicity, or both. (Check one response.)	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input type="checkbox"/> Chronic <input type="checkbox"/> Both
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# TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
<b>Test Type</b>			
Indicate the type of test performed. (Check one response.)	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through
<b>Source of Dilution Water</b>			
Indicate the source of dilution water. (Check one response.)	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water
If laboratory water, specify type.	20% DMW	20%DMW	
If receiving water, specify source.			
<b>Type of Dilution Water</b>			
Indicate the type of dilution water. If salt water, specify "natural" or type of artificial sea salts or brine used.	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)
<b>Percentage Effluent Used</b>			
Specify the percentage effluent used for all concentrations in the test series.	7.0	7.0	
<b>Parameters Tested</b>			
Check the parameters tested.	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature	<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
			<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen
			<input type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
			<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen
<b>Acute Test Results</b>			
Percent survival in 100% effluent	95 %	100 %	%
LC <sub>50</sub>			
95% confidence interval	4.8668-5.5120 %	1.0682-1.2580 %	%
Control percent survival	95 %	100 %	%

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TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY						
The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.						
	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____			
<b>Acute Test Results Continued</b>						
Other (describe)						
<b>Chronic Test Results</b>						
NOEC	%	%	%			
IC <sub>25</sub>	%	%	%			
Control percent survival	95 %	100.0 %	%			
Other (describe)	Pass	Pass				
<b>Quality Control/Quality Assurance</b>						
Is reference toxicant data available?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Was reference toxicant test within acceptable bounds?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
What date was reference toxicant test run (MM/DD/YYYY)?	07/30/2019		07/30/2019			
Other (describe)						

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**TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY**

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

**Test Information**

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
Test species	Pimephales Promelas	Ceriodaphnia Dubia	
Age at initiation of test	<72 hours	<24 hours (within 8 hours)	
Outfall number	DSN 001	DSN 001	
Date sample collected	08/13/2018	08/13/2018	
Date test started	08/14/2018	08/14/2018	
Duration	7 Days (3 samples; 8/14 - 8/21)	7 Days (3 samples 8/14 - 8/21)	

**Toxicity Test Methods**

Test method number	1000.0	1002.0	
Manual title	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	Short-Term Methods for Estimating the Chronic Toxicity of Wastewater to Daphnia magna	
Edition number and year of publication	Fourth Edition, October 2002	Fourth Edition, October 2002	
Page number(s)	53 - 111	141 - 196	

**Sample Type**

Check one:	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input checked="" type="checkbox"/> 24-hour composite	<input type="checkbox"/> Grab <input type="checkbox"/> 24-hour composite
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**Sample Location**

Check one:	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before Disinfection <input checked="" type="checkbox"/> After Disinfection <input type="checkbox"/> After Dechlorination	<input type="checkbox"/> Before disinfection <input type="checkbox"/> After disinfection <input type="checkbox"/> After dechlorination
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**Point in Treatment Process**

Describe the point in the treatment process at which the sample was collected for each test.	Plant Effluent	Plant Effluent	RECEIVED  FEB 17 2023  MUNICIPAL SECTION
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**Toxicity Type**

Indicate for each test whether the test was performed to assess acute or chronic toxicity, or both. (Check one response.)	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input checked="" type="checkbox"/> Chronic <input type="checkbox"/> Both	<input type="checkbox"/> Acute <input type="checkbox"/> Chronic <input type="checkbox"/> Both
---	--	--	---

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 001
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# TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

	Test Number <u>1</u>	Test Number <u>2</u>	Test Number _____
<b>Test Type</b>			
Indicate the type of test performed. (Check one response.)	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input checked="" type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through	<input type="checkbox"/> Static <input type="checkbox"/> Static-renewal <input type="checkbox"/> Flow-through
<b>Source of Dilution Water</b>			
Indicate the source of dilution water. (Check one response.)	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input checked="" type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water	<input type="checkbox"/> Laboratory water <input type="checkbox"/> Receiving water
If laboratory water, specify type.	20% DMW	20%DMW	
If receiving water, specify source.			
<b>Type of Dilution Water</b>			
Indicate the type of dilution water. If salt water, specify "natural" or type of artificial sea salts or brine used.	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input checked="" type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)	<input type="checkbox"/> Fresh water <input type="checkbox"/> Salt water (specify)
<b>Percentage Effluent Used</b>			
Specify the percentage effluent used for all concentrations in the test series.	7.0	7.0	RECEIVED
			FEB 17 2023
			MUNICIPAL SECTION
<b>Parameters Tested</b>			
Check the parameters tested.	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature	<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen	<input checked="" type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
		<input type="checkbox"/> Ammonia <input type="checkbox"/> Dissolved oxygen	<input type="checkbox"/> pH <input type="checkbox"/> Salinity <input type="checkbox"/> Temperature
<b>Acute Test Results</b>			
Percent survival in 100% effluent	98.3 %	100 %	%
LC <sub>50</sub>			
95% confidence interval	587-761 %	99-160 %	%
Control percent survival	91.7 %	100 %	%



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**TABLE E. EFFLUENT MONITORING FOR WHOLE EFFLUENT TOXICITY**

The table provides response space for one whole effluent toxicity sample. Copy the table to report additional test results.

	Test Number <sup>1</sup> _____	Test Number <sup>2</sup> _____	Test Number _____
<b>Acute Test Results Continued</b>			
Other (describe)			
<b>Chronic Test Results</b>			
NOEC	%	%	%
IC <sub>25</sub>	%	%	%
Control percent survival	91.7 %	100.0 %	%
Other (describe)	Pass	Pass	
<b>Quality Control/Quality Assurance</b>			
Is reference toxicant data available?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
Was reference toxicant test within acceptable bounds?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Yes <input type="checkbox"/> No
What date was reference toxicant test run (MM/DD/YYYY)?	07/24/2018	07/24/2018	
Other (describe)			

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# TABLE F. INDUSTRIAL DISCHARGE INFORMATION

Response space is provided for three SIUs. Copy the table to report information for additional SIUs.

	SIU 1	SIU 2	SIU 3
Name of SIU	Tyson Foods	Cintas Corporation #746	Etowah Chemical Sales & Services
Mailing address (street or P.O. box)	507 Keystone Foods Industrial Parkway	1209 Airport Industrial Drive	2508 Schuler Avenue
City, state, and ZIP code	Gadsden, AL 35904	Gadsden, AL 35904	Gadsden, AL 35904
Description of all industrial processes that affect or contribute to the discharge.	Food Cooking & Clean Up	Commercial Uniform Supplier/Laundrer	Chemical Mixing and Degreaser Manufacturing
List the principal products and raw materials that affect or contribute to the SIU's discharge.	Chicken, Oil, Flour, Seasonings, Preservatives	Rental Uniforms, Dirty Uniforms, Detergents, Degreasers	Industrial Cleaning & Degreasing Products: Acids, Bases, Phosphates
Indicate the average daily volume of wastewater discharged by the SIU.	350K - 450K gpd	85,000 gpd	1,000 gpd
How much of the average daily volume is attributable to process flow?	350K - 450K gpd	85,000 gpd	1,000 gpd
How much of the average daily volume is attributable to non-process flow?	1st Flush gpd	gpd	gpd
Is the SIU subject to local limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the SIU subject to categorical standards?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP
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Form Approved 03/05/19  
OMB No. 2040-0004

# TABLE F. INDUSTRIAL DISCHARGE INFORMATION

Response space is provided for three SIUs. Copy the table to report information for additional SIUs.

	SIU <u>1</u>	SIU <u>2</u>	SIU <u>3</u>
Under what categories and subcategories is the SIU subject?	2015 - Poultry Slaughtering & Processing	7218 - Industrial Launderers	2841 - Soap and Other Detergents, except Specialty Cleaners  2842 - Specialty Cleaning, Polishing, and Sanitation Preparations
Has the POTW experienced problems (e.g., upsets, pass-through interferences) in the past 4.5 years that are attributable to the SIU?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, describe.			



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP
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Form Approved 03/05/19  
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# **TABLE F. INDUSTRIAL DISCHARGE INFORMATION**

Response space is provided for three SIUs. Copy the table to report information for additional SIUs.

	SIU <u>4</u>	SIU <u>5</u>	SIU <u>6</u>
Name of SIU	Choice Fabricators, Inc	Prince Metal Stamping	Techtrix, Inc.
Mailing address (street or P.O. box)	3155 Steele Station Road	1108 Airport Industrial Drive	525 Plainview Street
City, state, and ZIP code	Rainbow City, AL 35906	Gadsden, AL 35904	Gadsden, AL 35901
Description of all industrial processes that affect or contribute to the discharge.	Metal Stamping, E-coating, Powder Coating	Metal Stamping, E-coating, Powder Coating	Metal Stamping, E-coating, Powder Coating
List the principal products and raw materials that affect or contribute to the SIU's discharge.	Fabricated Metal, Metal, Steel, Cutting Oils, Acids, Bases	Fabricated Metal, Metal, Steel, Cutting Oils, Acids, Bases	Fabricated Metal, Metal, Steel, Cutting Oils, Acids, Bases
Indicate the average daily volume of wastewater discharged by the SIU.	12,000 gpd	5,000 gpd	1,000 gpd
How much of the average daily volume is attributable to process flow?	12,000 gpd	5,000 gpd	1,000 gpd
How much of the average daily volume is attributable to non-process flow?	gpd	gpd	gpd
Is the SIU subject to local limits?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Is the SIU subject to categorical standards?	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

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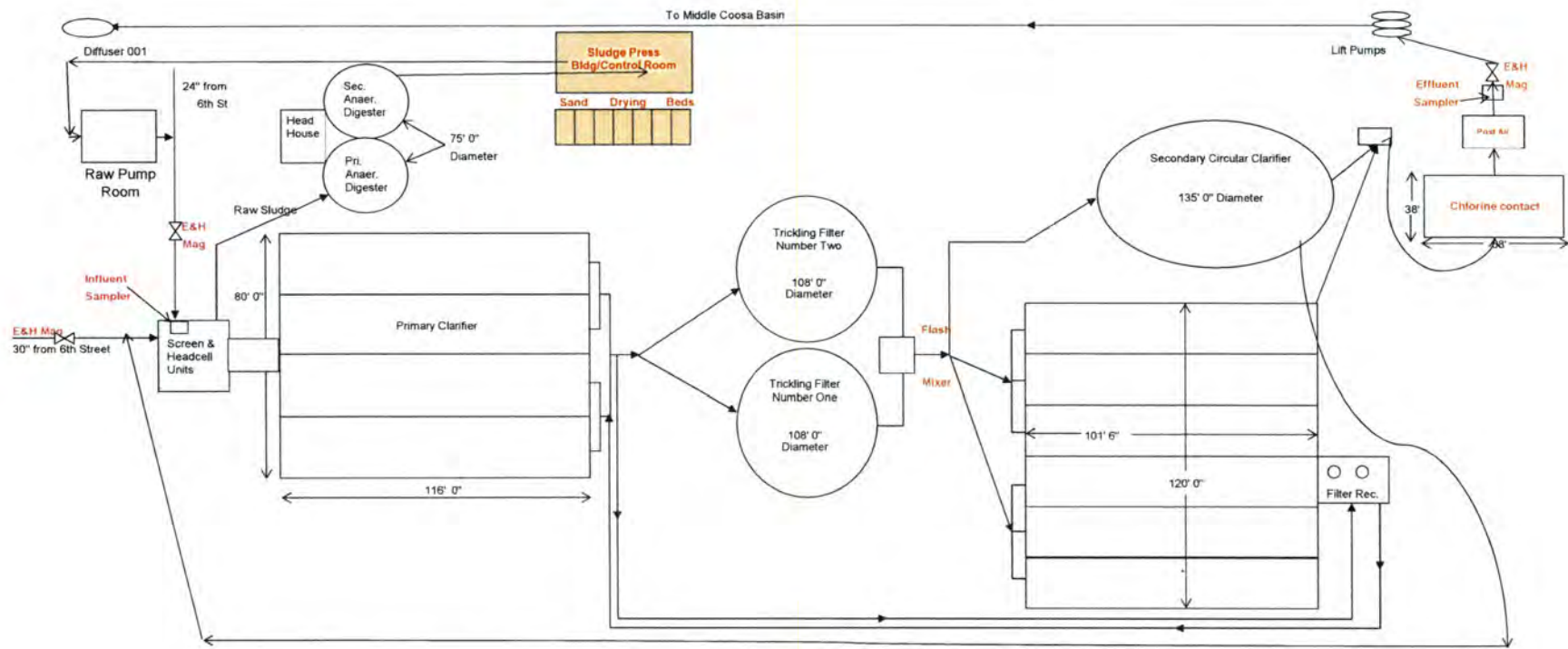
EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP
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Form Approved 03/05/19  
OMB No. 2040-0004

# **TABLE F. INDUSTRIAL DISCHARGE INFORMATION**

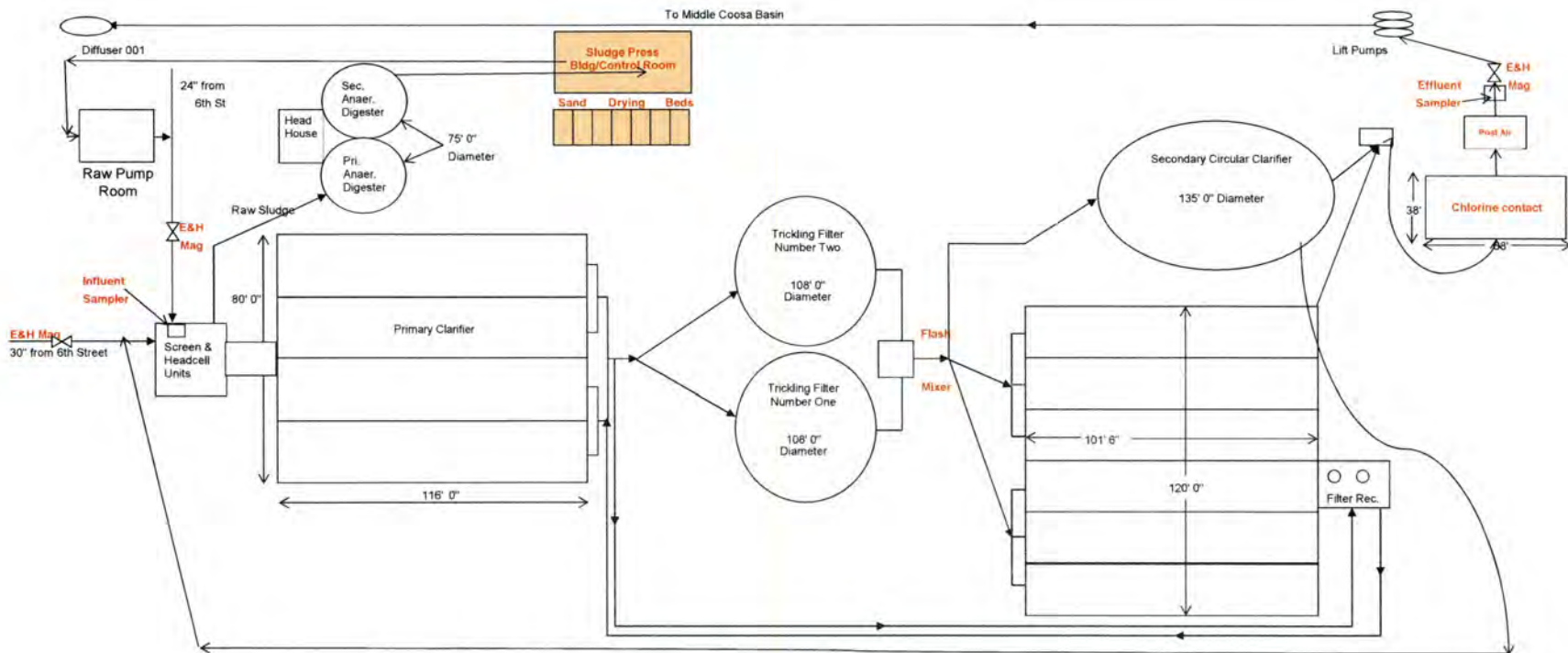
Response space is provided for three SIUs. Copy the table to report information for additional SIUs.

	SIU <u>1</u>	SIU <u>2</u>	SIU <u>   </u>
Under what categories and subcategories is the SIU subject?	3469 - Metal Stamping, Not Elsewhere Classified	3465 - Automotive Stampings	3479 - Coating, Engraving, and Allied Services, Not Elsewhere Classified
Has the POTW experienced problems (e.g., upsets, pass-through interferences) in the past 4.5 years that are attributable to the SIU?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
If yes, describe.	<p>RECEIVED</p> <p>MAR 10 2023</p> <p>MUNICIPAL SECTION</p>		



# GADSDEN WEST RIVER WWTP

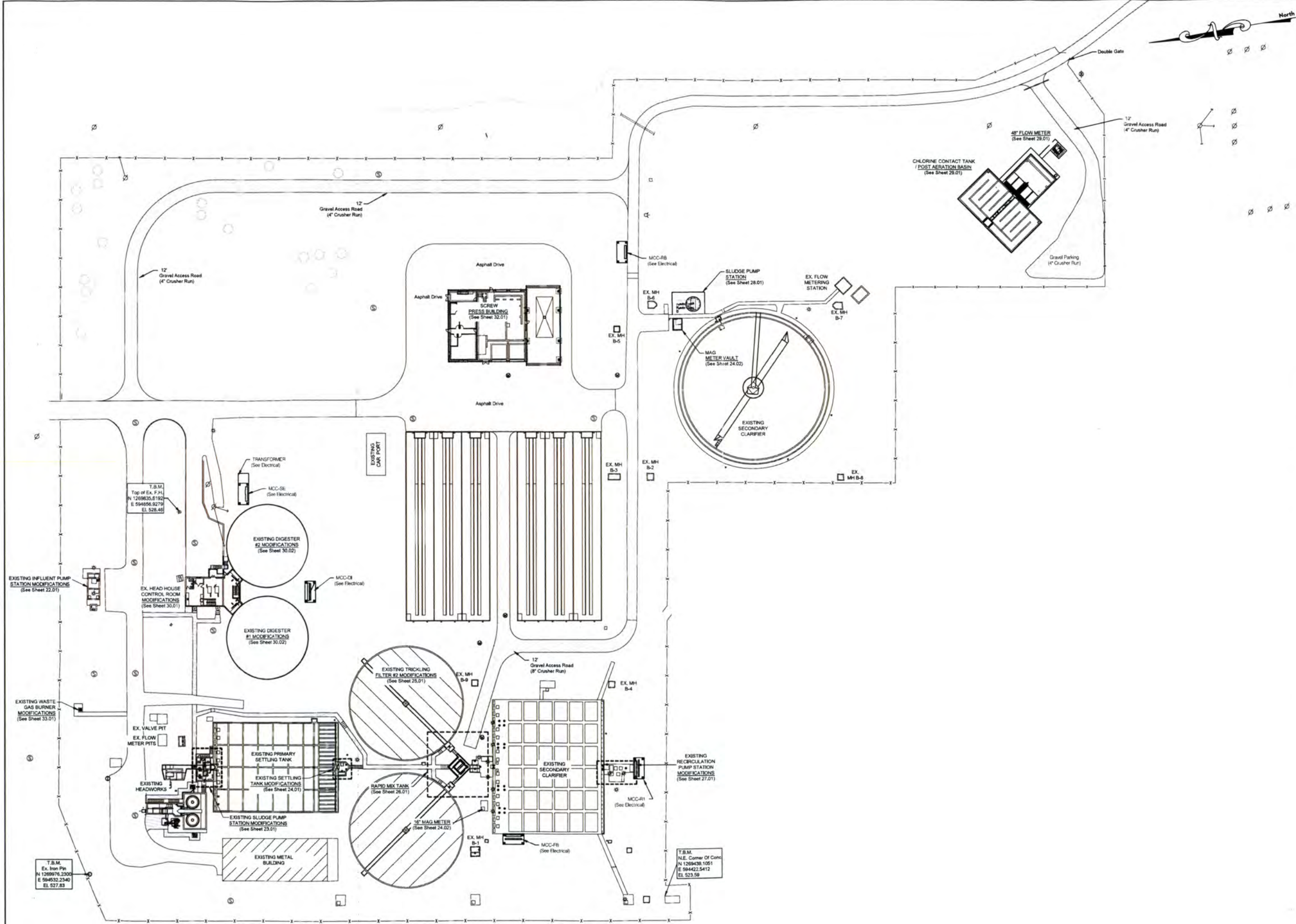
AL0053201 - Average Daily Flow (this Permit Application) - 7.529 MGD



# GADSDEN WEST RIVER WWTTP

AL0053201 - Average Daily Flow (this Permit Application) - 7.529 MGD





WEST RIVER WWTP  
OVERALL SITE PLAN

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046

Scale- 1" = 40'-0"

18.01  
sheet 56 of 104

ISSUE DATE

Final	07.20.2012
Revision	02.26.2013
As-built	06.20.2014
Project Manager	BMG/JWC
Engineer	TR/JWC
Designer	TR
Drawn by	KD/FN/MP

RECORD  
DRAWINGS

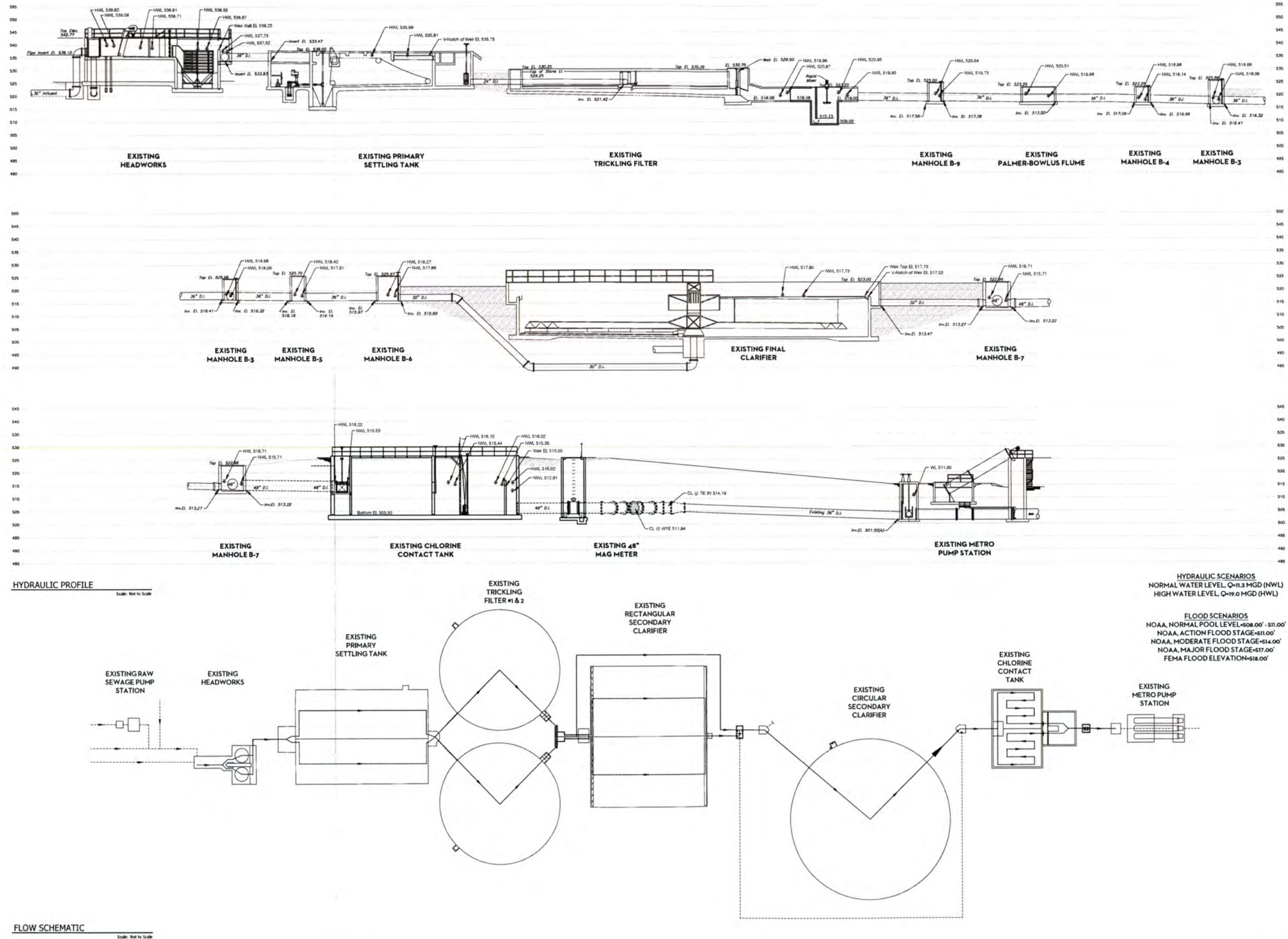
AS BUILT RECORD DRAWING  
AS FURNISHED BY THE  
CONTRACTOR



GOODYYN MILLS CAWOOD

2660 EastChase Lane, Suite 200 | Montgomery, AL 36117  
Tel 334-271-3200 | GMCNETWORK.COM





WEST RIVER WWTW  
HYDRAULIC PROFILE  
& PIPING SCHEMATIC

19.01  
sheet 58 of 104

PHASE II EAST & WEST RIVER WWTW IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046  
Scale- 1"= 200'

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
As-built	06.20.2014
Project Manager	BMJ/JWC
Engineer	TR/JWC
Designer	TR
Drawn by	KD/FN/MP

RECORD  
DRAWINGS

AS BUILT RECORD DRAWING  
AS FURNISHED BY THE  
CONTRACTOR



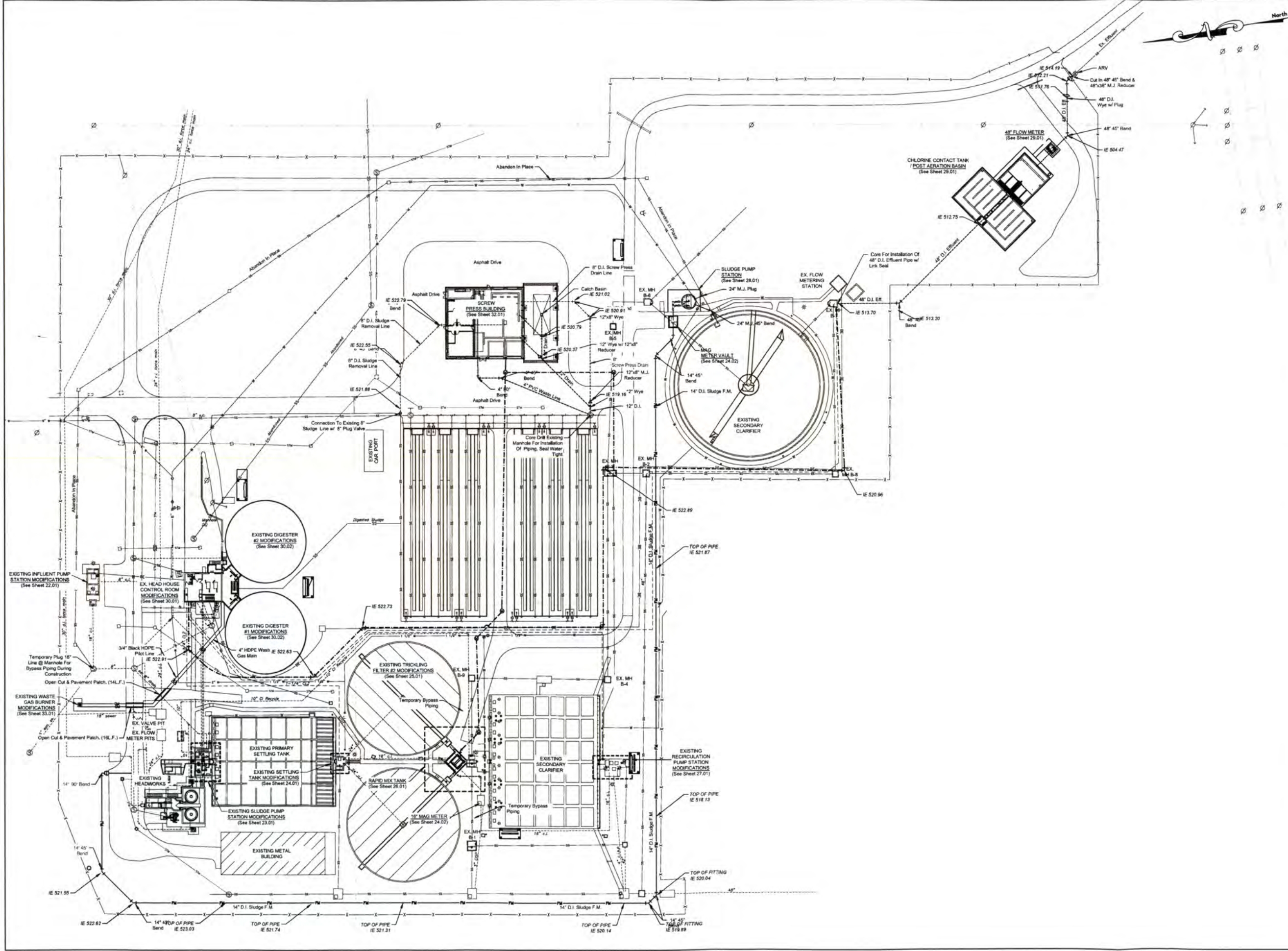
GOODWYN MILLS CAWOOD

2660 EastChase Lane, Suite 200 | Montgomery, AL 36117  
Tel 334.271.3200 | GMCNETWORK.COM









WEST RIVER WWTF  
YARD PIPING  
SITE PLAN

21.01  
sheet 62 of 104

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046  
Scale- 1" = 40'-0"

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
As-built	06.20.2014
Project Manager	BMJ/JWC
Engineer	TR/JWC
Designer	TR
Drawn by	KD/FN/MP

RECORD  
DRAWINGS

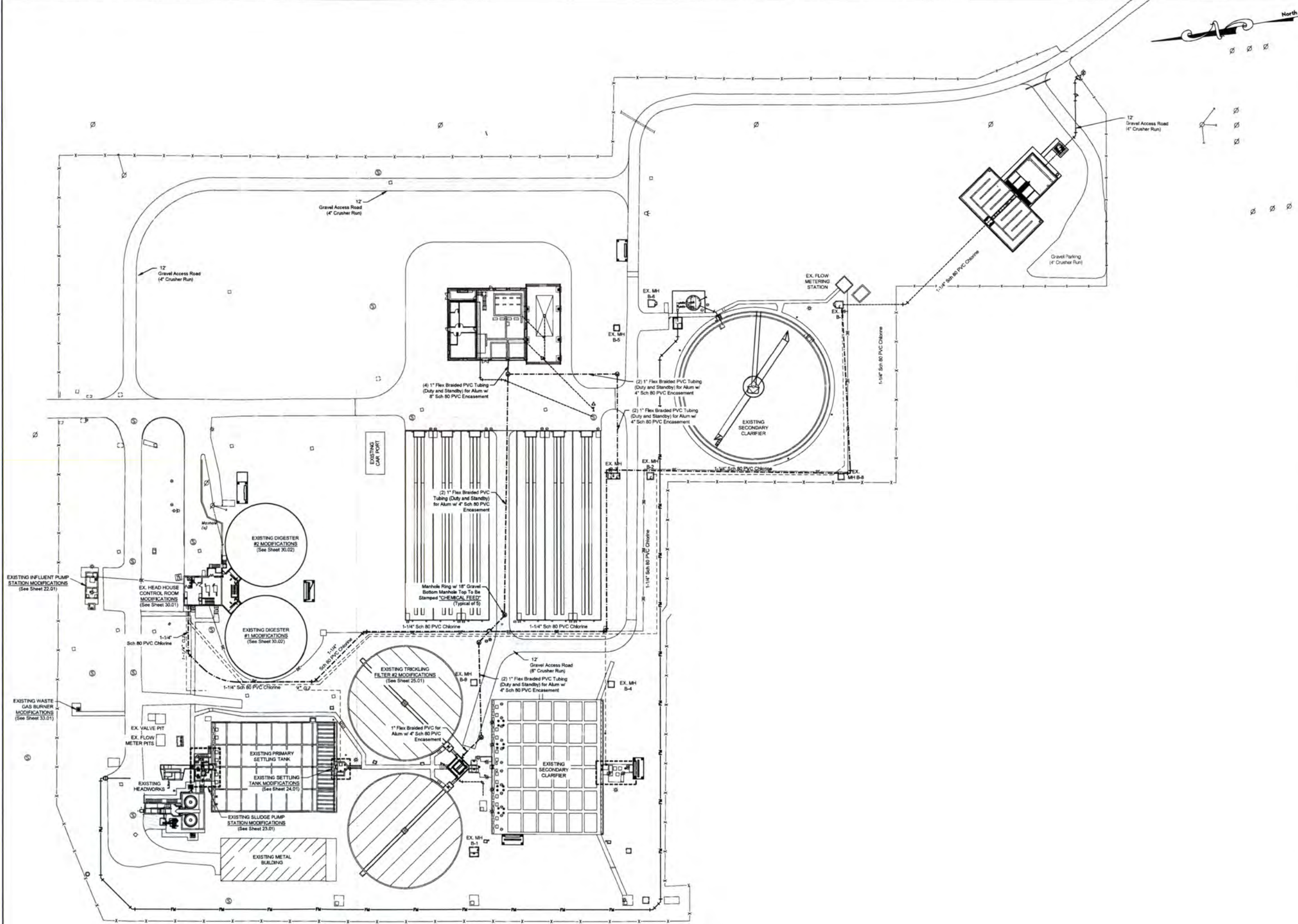
AS BUILT RECORD DRAWING  
AS FURNISHED BY THE  
CONTRACTOR



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WEST RIVER WWTP  
CHEMICAL FEED PIPING  
SITE PLAN

21.02  
sheet 63 of 104

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046  
Scale- 1" = 40'-0"

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
Asbuilt	06.20.2014
Project Manager	
Engineer	
Designer	
Drawn by	

BM/JWC  
TR/JWC  
TR  
KD/FN/MP

RECORD  
DRAWINGS

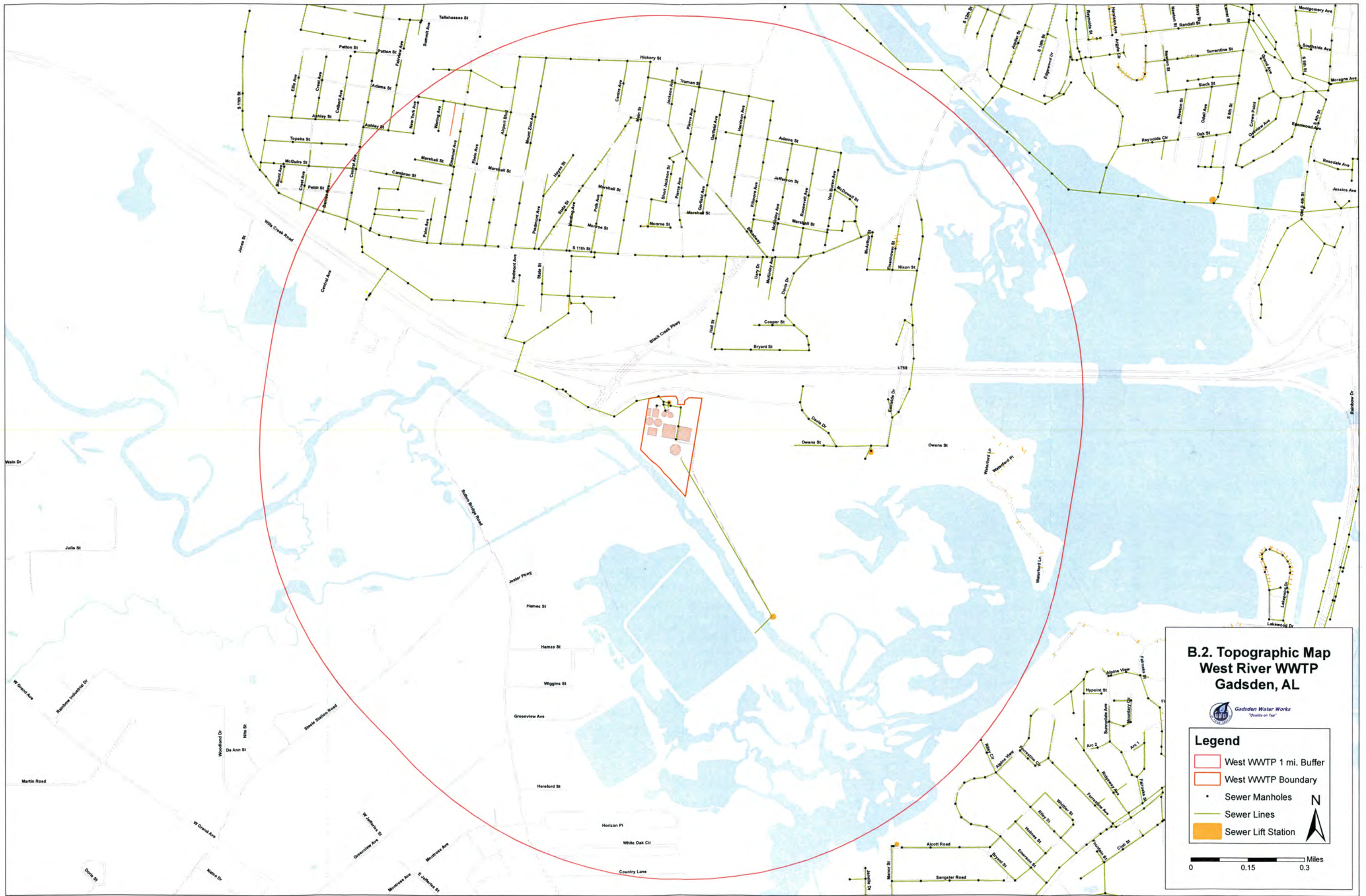
AS BUILT RECORD DRAWING  
AS FURNISHED BY THE  
CONTRACTOR



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Tel 334.271.3200 | GMCNETWORK.COM

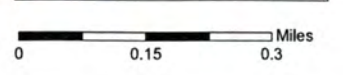




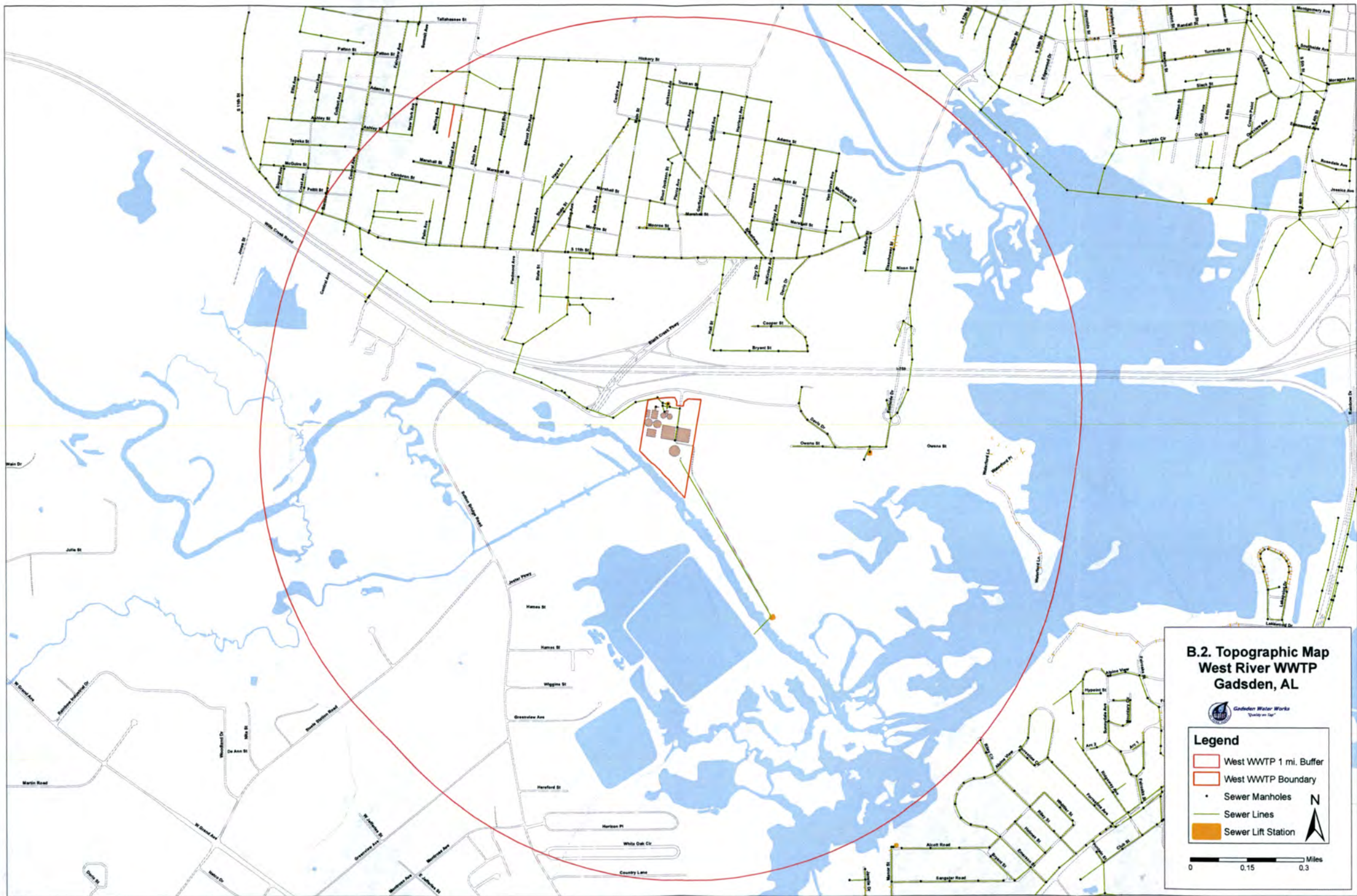
## B.2. Topographic Map West River WWTP Gadsden, AL



- Legend**
- West WWTP 1 mi. Buffer
  - West WWTP Boundary
  - Sewer Manholes
  - Sewer Lines
  - Sewer Lift Station







**B.2. Topographic Map  
West River WWTP  
Gadsden, AL**



**Legend**

- West WWTP 1 mi. Buffer
- West WWTP Boundary
- Sewer Manholes
- Sewer Lines
- Sewer Lift Station



0 0.15 0.3 Miles



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004	
Form 2F NPDES	 <b>U.S Environmental Protection Agency</b> <b>Application for NPDES Permit to Discharge Wastewater</b> <b>STORMWATER DISCHARGES ASSOCIATED WITH INDUSTRIAL ACTIVITY</b>			
<b>SECTION 1. OUTFALL LOCATION (40 CFR 122.21(g)(1))</b>				
<b>Outfall Location</b>	1.1	Provide information on each of the facility's outfalls in the table below		
	Outfall Number	Receiving Water Name	Latitude	Longitude
	002S	Coosa River	33° 59' 20" N	-86° 02' 14" W
	003S	Coosa River	33° 59' 09" N	-86° 02' 02" W
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
			° ' "	° ' "
<b>SECTION 2. IMPROVEMENTS (40 CFR 122.21(g)(6))</b>				
<b>Improvements</b>	2.1	Are you presently required by any federal, state, or local authority to meet an implementation schedule for constructing, upgrading, or operating wastewater treatment equipment or practices or any other environmental programs that could affect the discharges described in this application? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No → SKIP to Section 3.</span>		
	2.2	Briefly identify each applicable project in the table below.		
	Brief Identification and Description of Project	Affected Outfalls (list outfall numbers)	Source(s) of Discharge	Final Compliance Dates
				Required      Projected
2.3	Have you attached sheets describing any additional water pollution control programs (or other environmental projects that may affect your discharges) that you now have underway or planned? (Optional Item) <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No</span>			

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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP
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Form Approved 03/05/19  
OMB No. 2040-0004

### SECTION 3. SITE DRAINAGE MAP (40 CFR 122.26(c)(1)(i)(A))

Site Drainage Map	3.1	Have you attached a site drainage map containing all required information to this application? (See instructions for specific guidance.)
	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

### SECTION 4. POLLUTANT SOURCES (40 CFR 122.26(c)(1)(i)(B))

Pollutant Sources	4.1	Provide information on the facility's pollutant sources in the table below.																										
		Outfall Number	Impervious Surface Area (within a mile radius of the facility)	Total Surface Area Drained (within a mile radius of the facility)																								
				specify units	specify units																							
		002S	N/A	N/A	2.9 Acres																							
		003S	36,000	ft2	8.6 Acres																							
				specify units	specify units																							
				specify units	specify units																							
				specify units	specify units																							
				specify units	specify units																							
				specify units	specify units																							
				specify units	specify units																							
				specify units	specify units																							
	4.2	<p>Provide a narrative description of the facility's significant material in the space below. (See instructions for content requirements.)</p> <p>Impervious areas around the plant are limited to access road, parking areas, and access for sand drying beds. Total impervious area is approximately 36,000 square feet, with zero (0) square feet located in the 002S discharge collection area. Drying bed use is greatly reduced with utilization of screw presses for sludge dewatering. Any sludge stored onsite for later disposal is contained on one (1) of six (6) drying beds, with any runoff returned to West River WWTP's influent pump station.</p> <p>All herbicides are stored in a locked storage area, and are applied per manufacturers' recommendations in/on pervious areas.</p>																										
4.3	<p>Provide the location and a description of existing structural and non-structural control measures to reduce pollutants in stormwater runoff. (See instructions for specific guidance.)</p> <table border="1"> <thead> <tr> <th colspan="3">Stormwater Treatment</th> </tr> <tr> <th>Outfall Number</th> <th>Control Measures and Treatment</th> <th>Codes from Exhibit 2F-1 (list)</th> </tr> </thead> <tbody> <tr> <td>002S</td> <td>Drainage channel widened to allow water some quiescence, allowing for settling and</td> <td>1-F, 1-U,</td> </tr> <tr> <td></td> <td>absorption.</td> <td>1-X, 4-A</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> <tr> <td>003S</td> <td>Storm water detention pond provides for some solids retention</td> <td>1-F, 1-U,</td> </tr> <tr> <td></td> <td></td> <td>1-X, 4-A</td> </tr> <tr> <td></td> <td></td> <td></td> </tr> </tbody> </table>				Stormwater Treatment			Outfall Number	Control Measures and Treatment	Codes from Exhibit 2F-1 (list)	002S	Drainage channel widened to allow water some quiescence, allowing for settling and	1-F, 1-U,		absorption.	1-X, 4-A				003S	Storm water detention pond provides for some solids retention	1-F, 1-U,			1-X, 4-A			
Stormwater Treatment																												
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		1-X, 4-A																										

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP
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Form Approved 03/05/19  
OMB No. 2040-0004

### SECTION 5. NON STORMWATER DISCHARGES (40 CFR 122.26(c)(1)(i)(C))

Non-Stormwater Discharges	5.1	I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of non-stormwater discharges. Moreover, I certify that the outfalls identified as having non-stormwater discharges are described in either an accompanying NPDES Form 2C, 2D, or 2E application.			
		Name (print or type first and last name)		Official title	
		Chad Hare		General Manager	
		Signature		Date signed	
				08/11/2022	
	5.2	Provide the testing information requested in the table below.			
		Outfall Number	Description of Testing Method Used	Date(s) of Testing	Onsite Drainage Points Directly Observed During Test
		002S	Upon occurrence of rain event, and subsequent storm	01/23/2019	Discharge
		003S	water discharge, 002S and 003S were sampled per	01/23/2019	Discharge
			Storm Water 2F protocol. Flows were determined by		
		timing the filling of jugs and five-gallon buckets.			

### SECTION 6. SIGNIFICANT LEAKS OR SPILLS (40 CFR 122.26(c)(1)(i)(D))

Significant Leaks or Spills	6.1	Describe any significant leaks or spills of toxic or hazardous pollutants in the last three years. N/A
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### SECTION 7. DISCHARGE INFORMATION (40 CFR 122.26(c)(1)(i)(E))

Discharge Information	See the instructions to determine the pollutants and parameters you are required to monitor and, in turn, the tables you must complete. Not all applicants need to complete each table.	
	7.1	Is this a new source or new discharge? <input type="checkbox"/> Yes → See instructions regarding submission of estimated data. <input checked="" type="checkbox"/> No → See instructions regarding submission of actual data.
	Tables A, B, C, and D	
	7.2	Have you completed Table A for each outfall? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No



EPA Identification Number 100000033894		NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004
Discharge Information Continued	7.3	Is the facility subject to an effluent limitation guideline (ELG) or effluent limitations in an NPDES permit for its process wastewater? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 7.5.		
	7.4	Have you completed Table B by providing quantitative data for those pollutants that are (1) limited either directly or indirectly in an ELG and/or (2) subject to effluent limitations in an NPDES permit for the facility's process wastewater? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
	7.5	Do you know or have reason to believe any pollutants in Exhibit 2F-2 are present in the discharge? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.7.		
	7.6	Have you listed all pollutants in Exhibit 2F-2 that you know or have reason to believe are present in the discharge and provided quantitative data or an explanation for those pollutants in Table C? <input type="checkbox"/> Yes <input type="checkbox"/> No		
	7.7	Do you qualify for a small business exemption under the criteria specified in the Instructions? <input type="checkbox"/> Yes → SKIP to Item 7.18. <input checked="" type="checkbox"/> No		
	7.8	Do you know or have reason to believe any pollutants in Exhibit 2F-3 are present in the discharge? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.10.		
	7.9	Have you listed all pollutants in Exhibit 2F-3 that you know or have reason to believe are present in the discharge in Table C? <input type="checkbox"/> Yes <input type="checkbox"/> No		
	7.10	Do you expect any of the pollutants in Exhibit 2F-3 to be discharged in concentrations of 10 ppb or greater? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.12.		
	7.11	Have you provided quantitative data in Table C for those pollutants in Exhibit 2F-3 that you expect to be discharged in concentrations of 10 ppb or greater? <input type="checkbox"/> Yes <input type="checkbox"/> No		
	7.12	Do you expect acrolein, acrylonitrile, 2,4-dinitrophenol, or 2-methyl-4,6-dinitrophenol to be discharged in concentrations of 100 ppb or greater? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.14.		
	7.13	Have you provided quantitative data in Table C for the pollutants identified in Item 7.12 that you expect to be discharged in concentrations of 100 ppb or greater? <input type="checkbox"/> Yes <input type="checkbox"/> No		
	7.14	Have you provided quantitative data or an explanation in Table C for pollutants you expect to be present in the discharge at concentrations less than 10 ppb (or less than 100 ppb for the pollutants identified in Item 7.12)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
	7.15	Do you know or have reason to believe any pollutants in Exhibit 2F-4 are present in the discharge? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 7.17.		
	7.16	Have you listed pollutants in Exhibit 2F-4 that you know or believe to be present in the discharge and provided an explanation in Table C? <input type="checkbox"/> Yes <input type="checkbox"/> No		
7.17	Have you provided information for the storm event(s) sampled in Table D? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004
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<b>Discharge Information Continued</b>	<b>Used or Manufactured Toxics</b>			
	7.18	Is any pollutant listed on Exhibits 2F-2 through 2F-4 a substance or a component of a substance used or manufactured as an intermediate or final product or byproduct?		
		<input type="checkbox"/> Yes <span style="margin-left: 200px;"><input checked="" type="checkbox"/> No → SKIP to Section 8.</span>		
	7.19	List the pollutants below, including TCDD if applicable.		
		1.	4.	7.
	2.	5.	8.	
	3.	6.	9.	

<b>SECTION 8. BIOLOGICAL TOXICITY TESTING DATA (40 CFR 122.21(g)(11))</b>				
<b>Biological Toxicity Testing Data</b>	8.1	Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last three years?		
		<input type="checkbox"/> Yes <span style="margin-left: 200px;"><input checked="" type="checkbox"/> No → SKIP to Section 9.</span> <span style="float: right;">08/11/2022</span>		
	8.2	Identify the tests and their purposes below.		
		Test(s)	Purpose of Test(s)	Submitted to NPDES Permitting Authority?
				<input type="checkbox"/> Yes <input type="checkbox"/> No
			<input type="checkbox"/> Yes <input type="checkbox"/> No	
			<input type="checkbox"/> Yes <input type="checkbox"/> No	

<b>SECTION 9. CONTRACT ANALYSIS INFORMATION (40 CFR 122.21(g)(12))</b>				
<b>Contract Analysis Information</b>	9.1	Were any of the analyses reported in Section 7 (on Tables A through C) performed by a contract laboratory or consulting firm?		
		<input checked="" type="checkbox"/> Yes <span style="margin-left: 200px;"><input type="checkbox"/> No → SKIP to Section 10.</span>		
	9.2	Provide information for each contract laboratory or consulting firm below.		
		Laboratory Number 1	Laboratory Number 2	Laboratory Number 3
	Name of laboratory/firm	Pace Analytical		
	Laboratory address	1168 Whigham Place Tuscaloosa, AL 35405		
	Phone number	(205) 614-6630		
	Pollutant(s) analyzed	O&G, COD, T-N		



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004																						
<b>SECTION 10. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))</b>																									
Checklist and Certification Statement	10.1	<p>In Column 1 below, mark the sections of Form 2F that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to complete all sections or provide attachments.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 35%;">Column 1</th> <th style="width: 65%;">Column 2</th> </tr> </thead> <tbody> <tr> <td><input checked="" type="checkbox"/> Section 1</td> <td><input type="checkbox"/> w/ attachments (e.g., responses for additional outfalls)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 2</td> <td><input type="checkbox"/> w/ attachments</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 3</td> <td><input checked="" type="checkbox"/> w/ site drainage map</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 4</td> <td><input type="checkbox"/> w/ attachments</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 5</td> <td><input type="checkbox"/> w/ attachments</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 6</td> <td><input type="checkbox"/> w/ attachments</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 7</td> <td> <input checked="" type="checkbox"/> Table A      <input type="checkbox"/> w/ small business exemption request  <input checked="" type="checkbox"/> Table B      <input type="checkbox"/> w/ analytical results as an attachment  <input type="checkbox"/> Table C      <input type="checkbox"/> Table D </td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 8</td> <td><input type="checkbox"/> w/attachments</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 9</td> <td><input type="checkbox"/> w/attachments (e.g., responses for additional contact laboratories or firms)</td> </tr> <tr> <td><input checked="" type="checkbox"/> Section 10</td> <td><input type="checkbox"/></td> </tr> </tbody> </table>		Column 1	Column 2	<input checked="" type="checkbox"/> Section 1	<input type="checkbox"/> w/ attachments (e.g., responses for additional outfalls)	<input checked="" type="checkbox"/> Section 2	<input type="checkbox"/> w/ attachments	<input checked="" type="checkbox"/> Section 3	<input checked="" type="checkbox"/> w/ site drainage map	<input checked="" type="checkbox"/> Section 4	<input type="checkbox"/> w/ attachments	<input checked="" type="checkbox"/> Section 5	<input type="checkbox"/> w/ attachments	<input checked="" type="checkbox"/> Section 6	<input type="checkbox"/> w/ attachments	<input checked="" type="checkbox"/> Section 7	<input checked="" type="checkbox"/> Table A <input type="checkbox"/> w/ small business exemption request <input checked="" type="checkbox"/> Table B <input type="checkbox"/> w/ analytical results as an attachment <input type="checkbox"/> Table C <input type="checkbox"/> Table D	<input checked="" type="checkbox"/> Section 8	<input type="checkbox"/> w/attachments	<input checked="" type="checkbox"/> Section 9	<input type="checkbox"/> w/attachments (e.g., responses for additional contact laboratories or firms)	<input checked="" type="checkbox"/> Section 10	<input type="checkbox"/>
	Column 1	Column 2																							
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	10.2	<p><b>Certification Statement</b></p> <p><i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i></p> <table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%;">Name (print or type first and last name)</td> <td style="width: 50%;">Official title</td> </tr> <tr> <td>Chad Hare</td> <td>General Manager</td> </tr> <tr> <td>Signature </td> <td>Date signed</td> </tr> <tr> <td></td> <td>05/01/2022</td> </tr> </table>		Name (print or type first and last name)	Official title	Chad Hare	General Manager	Signature	Date signed		05/01/2022														
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	Chad Hare	General Manager																							
Signature	Date signed																								
	05/01/2022																								

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FEB 17 2023  
MUNICIPAL SECTION

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 002S
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Form Approved 03/05/19  
OMB No. 2040-0004

**TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(c)(1)(i)(E)(3))<sup>1</sup>**

You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details and requirements.

Pollutant or Parameter		Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
1.	Oil and grease	2.2 mg/L		2.2 mg/L		1	
2.	Biochemical oxygen demand (BOD <sub>5</sub> )	2 mg/L	6 mg/L	2 mg/L	6 mg/L	1	
3.	Chemical oxygen demand (COD)	83.6 mg/L	121 mg/L	83.6 mg/L	121 mg/L	1	
4.	Total suspended solids (TSS)	5 mg/L	72 mg/L	5 mg/L	72 mg/L	1	
5.	Total phosphorus	0.17 mg/L	0.66 mg/L	0.17 mg/L	0.66 mg/L	1	
6.	Total Kjeldahl nitrogen (TKN)	0.99 mg/L	1.80 mg/L	0.99 mg/L	1.80 mg/L	1	
7.	Total nitrogen (as N)	2.38 mg/L	3.34 mg/L	2.38 mg/L	3.34 mg/L	1	
8.	pH (minimum)	6.72 su		6.72 su		1	
	pH (maximum)	6.72 su		6.72 su		1	

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 0035
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Form Approved 03/05/19  
OMB No. 2040-0004

**TABLE A. CONVENTIONAL AND NON CONVENTIONAL PARAMETERS (40 CFR 122.26(c)(1)(i)(E)(3))<sup>1</sup>**

You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details and requirements.

Pollutant or Parameter		Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
		Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
1.	Oil and grease	ND		ND		1	
2.	Biochemical oxygen demand (BOD <sub>5</sub> )	8 mg/L	4 mg/L	8 mg/L	4 mg/L	1	
3.	Chemical oxygen demand (COD)	124 mg/L	89.4 mg/L	124 mg/L	89.4 mg/L	1	
4.	Total suspended solids (TSS)	99 mg/L	48 mg/L	99 mg/L	48 mg/L	1	
5.	Total phosphorus	0.82 mg/L	0.32 mg/L	0.82 mg/L	0.32 mg/L	1	
6.	Total Kjeldahl nitrogen (TKN)	2.30 mg/L	1.30 mg/L	2.30 mg/L	1.30 mg/L	1	
7.	Total nitrogen (as N)	4.43 mg/L	2.69 mg/L	4.43 mg/L	2.69 mg/L	1	
8.	pH (minimum)	7.45 su		7.45 su		1	
	pH (maximum)	7.45 su		7.45 su		1	

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 002S
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Form Approved 03/05/19  
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**TABLE B. CERTAIN CONVENTIONAL AND NON CONVENTIONAL POLLUTANTS (40 CFR 122.26(c)(1)(i)(E)(4) and 40 CFR 122.21(g)(7)(vi)(A))<sup>1</sup>**

List each pollutant that is limited in an effluent limitation guideline (ELG) that the facility is subject to or any pollutant listed in the facility's NPDES permit for its process wastewater (if the facility is operating under an existing NPDES permit). Complete one table for each outfall. See the instructions for additional details and requirements.

Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
CBOD5	2 mg/L	4 mg/L	2 mg/L	4 mg/L	1	
NH3-N	0.07 mg/L	0.28 mg/L	0.07 mg/L	0.28 mg/L	1	
NO2	0.03 mg/L	0.04 mg/L	0.03 mg/L	0.04 mg/L	1	
NO3	1.28 mg/L	1.22 mg/L	1.28 mg/L	1.22 mg/L	1	
E. coli (MPN)	79 colonies	107 colonies	79 colonies	107 colonies	1	
DO	9.30 mg/L	N/A	9.3 mg/L	N/A	1	
TRC	ND	N/A	ND	N/A	1	
Temperature	11.8 Degrees C	N/A	11.8 Degrees C	N/A	1	

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Outfall Number 0035
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Pollutant and CAS Number (if available)	Maximum Daily Discharge (specify units)		Average Daily Discharge (specify units)		Number of Storm Events Sampled	Source of Information (new source/new dischargers only; use codes in instructions)
	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite	Grab Sample Taken During First 30 Minutes	Flow-Weighted Composite		
CBOD5	6 mg/L	9 mg/L	6 mg/L	9 mg/L	1	
NH3-N	0.42 mg/L	0.13 mg/L	0.42 mg/L	0.13 mg/L	1	
NO2	0.06 mg/L	0.05 mg/L	0.06 mg/L	0.05 mg/L	1	
NO3	1.65 mg/L	1.48 mg/L	1.65 mg/L	1.48 mg/L	1	
E. coli (MPN)	36 colonies	64 colonies	36 colonies	64 colonies	1	
DO	10.45 mg/L	N/A	10.45 mg/L	N/A	1	
TRC	ND	N/A	ND	N/A	1	
Temperature	12.1 Degrees C	N/A	12.1 Degrees C	N/A	1	

<sup>1</sup> Sampling shall be conducted according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR 136 for the analysis of pollutants or pollutant parameters or required under 40 CFR chapter I, subchapter N or O. See instructions and 40 CFR 122.21(e)(3).

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EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility name Gadsden West River WWTP	Outfall Number 002S
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**TABLE D. STORM EVENT INFORMATION (40 CFR 122.26(c)(1)(i)(E)(6))**

Provide data for the storm event(s) that resulted in the maximum daily discharges for the flow-weighted composite sample.

Date of Storm Event	Duration of Storm Event (in hours)	Total Rainfall During Storm Event (in inches)	Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event	Maximum Flow Rate During Rain Event (in gpm or specify units)	Total Flow from Rain Event (in gallons or specify units)
01/23/2019	1.33	0.75	approximately 90	7 gpm	approximately 2,000 gallons

Provide a description of the method of flow measurement or estimate.

Flow estimated by volume fill rate

EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility name Gadsden West River WWTP	Outfall Number 003S
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Form Approved 03/05/19  
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**TABLE D. STORM EVENT INFORMATION (40 CFR 122.26(c)(1)(i)(E)(6))**

Provide data for the storm event(s) that resulted in the maximum daily discharges for the flow-weighted composite sample.

Date of Storm Event	Duration of Storm Event (in hours)	Total Rainfall During Storm Event (in inches)	Number of Hours Between Beginning of Storm Measured and End of Previous Measurable Rain Event	Maximum Flow Rate During Rain Event (in gpm or specify units)	Total Flow from Rain Event (in gallons or specify units)
01/23/2019	1.33	0.75	approximately 90	7 gpm	approximately 2,000 gallons

Provide a description of the method of flow measurement or estimate.

Flow estimated by volume fill rate








Rainfall based on area					Bucket Fill during sample collection		
	Surface Area, ft2	Rainfall, inches	Total Accumulation, gallons	Estimated Runoff, gals*	Max Flow, gpm	Duration, mins	Total Flow, gals
002S	126324	0.8	62994	20998	6	120	720
003S	410616	0.8	204761	68254			

Estimated Flow for each discharge		
Estimated Runoff, gals	Percentage of precipitation believed absorbed (not making it to discharge)**	
20998	50%	10499
68254	80%	13650.8

\*USGS estimates that only 1/3 of precipitation becomes runoff, while the other 2/3 is absorbed.

\*\*Based on visual observations and reasonable guesstimation based on the flows that we see when collecting samples. Reasonable conjecture lends to the assumption that just a small percentage of the precipitation runs off after an extended time without rainfall.

\*\*\*In the recent 2F application, we rounded to the nearest 10,000 gallons

EPA Identification Number 100000033894		NPDES Permit Number AL0053201		Facility Name Gadsden West River WWTP		Form Approved 03/05/19 JUL 14 2022 OMB No. 2040-0004	
Form 2S NPDES		<b>U.S. Environmental Protection Agency</b> <b>Application for NPDES Permit for Sewage Sludge Management</b> <b>NEW AND EXISTING TREATMENT WORKS TREATING DOMESTIC SEWAGE</b>					
<b>PRELIMINARY INFORMATION</b>							
Does your facility currently have an effective NPDES permit or have you been directed by your NPDES permitting authority to submit a full Form 2S permit application?							
<input checked="" type="checkbox"/> Yes → Complete Part 2 of application package (begins p. 7). <input type="checkbox"/> No → Complete Part 1 of application package (below).							
<b>PART 1</b>		<b>LIMITED BACKGROUND INFORMATION (40 CFR 122.21(c)(2)(ii))</b>					
Complete this part only if you are a "sludge-only" facility (i.e., a facility that does not currently have, and is not applying for, an NPDES permit for a direct discharge to a surface body of water).							
<b>PART 1, SECTION 1. FACILITY INFORMATION (40 CFR 122.21(c)(2)(ii)(A))</b>							
Facility Information	1.1	Facility name					
		Mailing address (street or P.O. box)					
		City or town			State	ZIP code	
		Contact name (first and last)		Title	Phone number	Email address	
		Location address (street, route number, or other specific identifier)					<input type="checkbox"/> Same as mailing address
		City or town			State	ZIP code	
	1.2	<b>Ownership Status</b>					
<input type="checkbox"/> Public—federal		<input type="checkbox"/> Public—state		<input type="checkbox"/> Other public (specify) _____			
<input type="checkbox"/> Private		<input type="checkbox"/> Other (specify) _____					
<b>PART 1, SECTION 2. APPLICANT INFORMATION (40 CFR 122.21(c)(2)(ii)(B))</b>							
Applicant Information	2.1	Is applicant different from entity listed under Item 1.1 above?					
	<input type="checkbox"/> Yes						<input type="checkbox"/> No → SKIP to Item 2.3 (Part 1, Section 2).
	2.2	Applicant name					
		Applicant address (street or P.O. box)					
		City or town			State	ZIP code	
2.3	Contact name (first and last)		Title	Phone number	Email address		
	Is the applicant the facility's owner, operator, or both? (Check only one response.)						
<input type="checkbox"/> Owner		<input type="checkbox"/> Operator		<input type="checkbox"/> Both			
2.4	To which entity should the NPDES permitting authority send correspondence? (Check only one response.)						
	<input type="checkbox"/> Facility		<input type="checkbox"/> Applicant		<input type="checkbox"/> Facility and applicant (they are one and the same)		
<b>PART 1, SECTION 3. SEWAGE SLUDGE AMOUNT (40 CFR 122.21(c)(2)(ii)(D))</b>							
Sewage Sludge Amount	3.1	Provide the total dry metric tons per the latest 365-day period of sewage sludge generated, treated, used, and disposed of:					
		<b>Practice</b>					<b>Dry Metric Tons per 365-Day Period</b>
		Amount generated at the facility					
		Amount treated at the facility					
		Amount used (i.e., received from off site) at the facility					
		Amount disposed of at the facility					

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<b>PART 1, SECTION 4. POLLUTANT CONCENTRATIONS (40 CFR 122.21(c)(2)(ii)(E))</b>																																																																																								
<b>Pollutant Concentrations</b>	4.1	<p>Using the table below or a separate attachment, provide existing sewage sludge monitoring data for the pollutants for which limits in sewage sludge have been established in 40 CFR 503 for your facility's expected use or disposal practices. If available, base data on three or more samples taken at least one month apart and no more than 4.5 years old.</p> <p><input type="checkbox"/> Check here if you have provided a separate attachment with this information.</p>																																																																																						
	<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Concentration (mg/kg dry weight)</th> <th>Analytical Method</th> <th>Detection Level for Analysis</th> </tr> </thead> <tbody> <tr><td>Arsenic</td><td></td><td></td><td></td></tr> <tr><td>Cadmium</td><td></td><td></td><td></td></tr> <tr><td>Chromium</td><td></td><td></td><td></td></tr> <tr><td>Copper</td><td></td><td></td><td></td></tr> <tr><td>Lead</td><td></td><td></td><td></td></tr> <tr><td>Mercury</td><td></td><td></td><td></td></tr> <tr><td>Molybdenum</td><td></td><td></td><td></td></tr> <tr><td>Nickel</td><td></td><td></td><td></td></tr> <tr><td>Selenium</td><td></td><td></td><td></td></tr> <tr><td>Zinc</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> <tr><td>Other (specify) _____</td><td></td><td></td><td></td></tr> </tbody> </table>				Pollutant	Concentration (mg/kg dry weight)	Analytical Method	Detection Level for Analysis	Arsenic				Cadmium				Chromium				Copper				Lead				Mercury				Molybdenum				Nickel				Selenium				Zinc				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____				Other (specify) _____			
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PART 1, SECTION 7. USE AND DISPOSAL SITES (40 CFR 122.21(c)(2)(ii)(C))

Use and Disposal Sites	Provide the following information for each site on which sewage sludge from this facility is used or disposed of. <input type="checkbox"/> Check here if you have provided separate attachments with this information.			
	7.1	Site name or number		
		Mailing address (street or P.O. box)		
		City or town	State	ZIP code
		Contact name (first and last)	Title	Phone number
		Email address		
		Location address (street, route number, or other specific identifier)		
		<input type="checkbox"/> Same as mailing address		
	7.2	City or town <span style="float: right;">State</span> <span style="float: right;">ZIP code</span>		
		County <span style="float: right;">County code</span> <span style="float: right;"><input type="checkbox"/> Not available</span>		
Site type (check all that apply)				
<div style="display: flex; flex-wrap: wrap;"> <div style="width: 33%;"><input type="checkbox"/> Agricultural</div> <div style="width: 33%;"><input type="checkbox"/> Lawn or home garden</div> <div style="width: 33%;"><input type="checkbox"/> Forest</div> <div style="width: 33%;"><input type="checkbox"/> Surface disposal</div> <div style="width: 33%;"><input type="checkbox"/> Public contact</div> <div style="width: 33%;"><input type="checkbox"/> Incineration</div> <div style="width: 33%;"><input type="checkbox"/> Reclamation</div> <div style="width: 33%;"><input type="checkbox"/> Municipal solid waste landfill</div> <div style="width: 33%;"><input type="checkbox"/> Other (describe)</div> </div>				

PART 1, SECTION 8. CHECKLIST AND CERTIFICATION STATEMENT (40 CFR 122.22(a) and (d))

Checklist and Certification Statement	8.1	In Column 1 below, mark the sections of Form 2S, Part 1, that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing to alert the permitting authority. Note that not all applicants are required to provide attachments.	
		Column 1	Column 2
		<input type="checkbox"/> Section 1: Facility Information	<input type="checkbox"/> w/ attachments
		<input checked="" type="checkbox"/> Section 2: Applicant Information	<input type="checkbox"/> w/ attachments
		<input checked="" type="checkbox"/> Section 3: Sewage Sludge Amount	<input type="checkbox"/> w/ attachments
		<input type="checkbox"/> Section 4: Pollutant Concentrations	<input type="checkbox"/> w/ attachments
		<input type="checkbox"/> Section 5: Treatment Provided at Your Facility	<input type="checkbox"/> w/ attachments
		<input type="checkbox"/> Section 6: Sewage Sludge Sent to Other Facilities	<input type="checkbox"/> w/ attachments
		<input type="checkbox"/> Section 7: Use and Disposal Sites	<input type="checkbox"/> w/ attachments
			<input type="checkbox"/> Section 8: Checklist and Certification Statement



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Checklist and Certification Statement Continued	8.2	<b>Certification Statement</b> <i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>		
		Name (print or type first and last name) <i>CHAD HARE</i>	Official title <i>General Manager</i>	Phone number <i>(256) 543-2884</i>
		Signature <i>[Signature]</i>		Date signed <i>7/12/2022</i>

**PART 1 APPLICANTS STOP HERE.**

Submit completed application package to your NPDES permitting authority.



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<b>PART 2</b>	<b>PERMIT APPLICATION INFORMATION (40 CFR 122.21(q))</b>
<p>Complete this part if you have an effective NPDES permit or have been directed by the NPDES permitting authority to submit a full permit application. In other words, complete this part if your facility has, or is applying for, an NPDES permit.</p> <p>Part 2 is divided into five sections. Section 1 pertains to all applicants. The applicability of Sections 2 to 5 depends on your facility's sewage sludge use or disposal practices. See the instructions to determine which sections you are required to complete.</p>	
<b>PART 2, SECTION 1. GENERAL INFORMATION (40 CFR 122.21(q)(1-7) AND (q)(13))</b>	
General Information	All Part 2 applicants must complete this section.
	<b>Facility Information</b>
	1.1 Facility name Gadsden West River WWTP
	Mailing address (street or P.O. box) P. O. Box 800
	City or town Gadsden
	State Alabama
	ZIP code 35902-0800
	Phone number (256) 543-2884
	Contact name (first and last) Mike Lankford
	Title AGM/Supt. of Environmental Svcs
	Email address mlankford@gadsdenwater.org
	Location address (street, route number, or other specific identifier) 2000 Wills Creek Road
	<input type="checkbox"/> Same as mailing address
	City or town Gadsden
	State Alabama
	ZIP code 35904
	1.2 Is this facility a Class I sludge management facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
	1.3 <b>Facility Design Flow Rate</b> 11.320 million gallons per day (mgd)
1.4 <b>Total Population Served</b> approximately 20,000	
1.5 <b>Ownership Status</b>	
<input type="checkbox"/> Public—federal <input type="checkbox"/> Public—state <input checked="" type="checkbox"/> Other public (specify) <u>municipal</u>	
<input type="checkbox"/> Private <input type="checkbox"/> Other (specify) _____	
<b>Applicant Information</b>	
1.6 Is applicant different from entity listed under Item 1.1 above? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 1.8 (Part 2, Section 1).	
1.7 Applicant name The Water Works and Sewer Board of the City of Gadsden, Alabama	
Applicant mailing address (street or P.O. box) P. O. Box 800	
City or town Gadsden	
State Alabama	
ZIP code 35902-0800	
Contact name (first and last) Chad Hare	
Title General Manager	
Phone number (256) 543-2884	
Email address chare@gadsdenwater.org	
1.8 Is the applicant the facility's owner, operator, or both? (Check only one response.) <input type="checkbox"/> Operator <input type="checkbox"/> Owner <input checked="" type="checkbox"/> Both	
1.9 To which entity should the NPDES permitting authority send correspondence? (Check only one response.) <input type="checkbox"/> Facility <input type="checkbox"/> Applicant <input checked="" type="checkbox"/> Facility and applicant (they are one and the same)	



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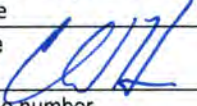
  

1.10	Facility's NPDES permit number <input type="checkbox"/> Check here if you do not have an NPDES permit but are otherwise required to submit Part 2 of Form 2S.	AL0053201
1.11	Indicate all other federal, state, and local permits or construction approvals received or applied for that regulate this facility's sewage sludge management practices below.	
	<input type="checkbox"/> RCRA (hazardous wastes) _____	<input type="checkbox"/> Nonattainment program (CAA) _____
	<input type="checkbox"/> PSD (air emissions) _____	<input type="checkbox"/> Dredge or fill (CWA Section 404) _____
	<input type="checkbox"/> Ocean dumping (MPRSA) _____	<input type="checkbox"/> UIC (underground injection of fluids) _____
	<input type="checkbox"/> NESHAPs (CAA) _____	
	<input type="checkbox"/> Other (specify) _____ _____	
<b>Indian Country</b>		
1.12	Does any generation, treatment, storage, application to land, or disposal of sewage sludge from this facility occur in Indian Country? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 1.14 (Part 2, Section 1) below.	
1.13	Provide a description of the generation, treatment, storage, land application, or disposal of sewage sludge that occurs.	
<b>Topographic Map</b>		
1.14	Have you attached a topographic map containing all required information to this application? (See instructions for specific requirements.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Line Drawing</b>		
1.15	Have you attached a line drawing and/or a narrative description that identifies all sewage sludge practices that will be employed during the term of the permit containing all the required information to this application? (See instructions for specific requirements.) <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	
<b>Contractor Information</b>		
1.16	Do contractors have any operational or maintenance responsibilities related to sewage sludge generation, treatment, use, or disposal at the facility? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 1.18 (Part 2, Section 1) below.	
1.17	Provide the following information for each contractor. <input type="checkbox"/> Check here if you have attached additional sheets to the application package.	
	<b>Contractor 1</b>	<b>Contractor 2</b>
Contractor company name	Denali Water Solutions	
Mailing address (street or P.O. box)	3308 Bernice Avenue	
City, state, and ZIP code	Russellville, AR 72802	
Contact name (first and last)	Jeff Retzke	
Telephone number	(256) 503-4300	
Email address	jeff.retzke@denaliwater.c	



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General Information Continued	1.17		<b>Contractor 1</b>	<b>Contractor 2</b>	<b>Contractor 3</b>
	cont.	Responsibilities of contractor	Land application of biosolids		
	<b>Pollutant Concentrations</b>				
	Using the table below or a separate attachment, provide sewage sludge monitoring data for the pollutants for which limits in sewage sludge have been established in 40 CFR 503 for this facility's expected use or disposal practices. All data must be based on three or more samples taken at least one month apart and must be no more than 4.5 years old.				
	<input type="checkbox"/> Check here if you have attached additional sheets to the application package.				
	1.18	<b>Pollutant</b>	<b>Average Monthly Concentration (mg/kg dry weight)</b>	<b>Analytical Method</b>	<b>Detection Level</b>
		Arsenic	4.98	EPA6010	0.5 mg/kg
		Cadmium	2.96	EPA6010	0.5 mg/kg
		Chromium	55.3	EPA6010	0.5 mg/kg
		Copper	247	EPA6010	0.5 mg/kg
	Lead	166	EPA6010	0.5 mg/kg	
	Mercury	0.535	EPA7471	0.0002 mg/kg	
	Molybdenum	12.27	EPA6010	1.0 mg/kg	
	Nickel	20.58	EPA6010	0.5 mg/kg	
	Selenium	3.90	EPA6010	0.5 mg/kg	
	Zinc	1,418	EPA6010	0.5 mg/kg	
<b>Checklist and Certification Statement</b>					
1.19	In Column 1 below, mark the sections of Form 2S, Part 2, that you have completed and are submitting with your application. For each section, specify in Column 2 any attachments that you are enclosing. Note that not all applicants are required to complete all sections or provide attachments. See Exhibit 2S-2 in the Instructions.				
	<b>Column 1</b>			<b>Column 2</b>	
	<input type="checkbox"/> Section 1 (General Information)			<input type="checkbox"/> w/ attachments	
	<input checked="" type="checkbox"/> Section 2 (Generation of Sewage Sludge or Preparation of a Material Derived from Sewage Sludge)			<input type="checkbox"/> w/ attachments	
	<input checked="" type="checkbox"/> Section 3 (Land Application of Bulk Sewage Sludge)			<input type="checkbox"/> w/ attachments	
	<input type="checkbox"/> Section 4 (Surface Disposal)			<input type="checkbox"/> w/ attachments	
	<input type="checkbox"/> Section 5 (Incineration)			<input type="checkbox"/> w/ attachments	
1.20	<b>Certification Statement</b>				
	<i>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</i>				
	Name (print or type first and last name) Chad Hare			Official title General Manager	
	Signature 			Date signed <u>7/12/2022</u>	
	Telephone number (256) 543-2884				
Upon the request of the NPDES permitting authority, you must submit any other information the authority deems necessary to assess sewage sludge use or disposal practices at your facility and identify appropriate permitting requirements.					



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<b>PART 2, SECTION 2. GENERATION OF SEWAGE SLUDGE OR PREPARATION OF A MATERIAL DERIVED FROM SEWAGE SLUDGE (40 CFR 122.21(q)(8) THROUGH (12))</b>			
Generation of Sewage Sludge or Preparation of a Material Derived from Sewage Sludge	2.1 Does your facility generate sewage sludge or derive a material from sewage sludge?		
	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Part 2, Section 3.		
	<b>Amount Generated Onsite</b>		
	2.2 Total dry metric tons per 365-day period generated at your facility:	481.78	
	<b>Amount Received from Off Site Facility</b>		
	2.3 Does your facility receive sewage sludge from another facility for treatment use or disposal?		
	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Item 2.7 (Part 2, Section 2) below.		
	2.4 Indicate the total number of facilities from which you receive sewage sludge for treatment, use, or disposal:		
	Provide the following information for each of the facilities from which you receive sewage sludge.		
	<input type="checkbox"/> Check here if you have attached additional sheets to the application package.		
	2.5 Name of facility		
	Mailing address (street or P.O. box)		
	City or town	State	ZIP code
	Contact name (first and last)	Title	Phone number
	Location address (street, route number, or other specific identifier)		<input type="checkbox"/> Same as mailing address
City or town	State	ZIP code	
County	County code	<input type="checkbox"/> Not available	
2.6 Indicate the amount of sewage sludge received, the applicable pathogen class and reduction alternative, and the applicable vector reduction option provided at the offsite facility.			
<b>Amount (dry metric tons)</b>	<b>Pathogen Class and Reduction Alternative</b>	<b>Vector Attraction Reduction Option</b>	
	<input type="checkbox"/> Not applicable <input type="checkbox"/> Class A, Alternative 1 <input type="checkbox"/> Class A, Alternative 2 <input type="checkbox"/> Class A, Alternative 3 <input type="checkbox"/> Class A, Alternative 4 <input type="checkbox"/> Class A, Alternative 5 <input type="checkbox"/> Class A, Alternative 6 <input type="checkbox"/> Class B, Alternative 1 <input type="checkbox"/> Class B, Alternative 2 <input type="checkbox"/> Class B, Alternative 3 <input type="checkbox"/> Class B, Alternative 4 <input type="checkbox"/> Domestic septage, pH adjustment	<input type="checkbox"/> Not applicable <input type="checkbox"/> Option 1 <input type="checkbox"/> Option 2 <input type="checkbox"/> Option 3 <input type="checkbox"/> Option 4 <input type="checkbox"/> Option 5 <input type="checkbox"/> Option 6 <input type="checkbox"/> Option 7 <input type="checkbox"/> Option 8 <input type="checkbox"/> Option 9 <input type="checkbox"/> Option 10 <input type="checkbox"/> Option 11	
2.7 Identify the treatment process(es) that are known to occur at the offsite facility, including blending activities and treatment to reduce pathogens or vector attraction properties. (Check all that apply.)			
<div style="display: flex; justify-content: space-between;"> <div style="width: 48%;"> <input checked="" type="checkbox"/> Preliminary operations (e.g., sludge grinding and degritting)  <input type="checkbox"/> Stabilization  <input type="checkbox"/> Composting  <input type="checkbox"/> Disinfection (e.g., beta ray irradiation, gamma ray irradiation, pasteurization)  <input type="checkbox"/> Heat drying  <input type="checkbox"/> Methane or biogas capture and recovery         </div> <div style="width: 48%;"> <input type="checkbox"/> Thickening (concentration)  <input checked="" type="checkbox"/> Anaerobic digestion  <input type="checkbox"/> Conditioning  <input checked="" type="checkbox"/> Dewatering (e.g., centrifugation, sludge drying beds, sludge lagoons)  <input type="checkbox"/> Thermal reduction  <input type="checkbox"/> Other (specify) _____         </div> </div>			



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Generation of Sewage Sludge or Preparation of a Material Derived from Sewage Sludge Continued

**Treatment Provided at Your Facility**

2.8 For each sewage sludge use or disposal practice, indicate the applicable pathogen class and reduction alternative and the applicable vector attraction reduction option provided at your facility. Attach additional pages, as necessary.

Use or Disposal Practice (check one)	Pathogen Class and Reduction Alternative	Vector Attraction Reduction Option
<input type="checkbox"/> Land application of bulk sewage	<input type="checkbox"/> Not applicable	<input type="checkbox"/> Not applicable
<input checked="" type="checkbox"/> Land application of biosolids (bulk)	<input type="checkbox"/> Class A, Alternative 1	<input checked="" type="checkbox"/> Option 1
<input type="checkbox"/> Land application of biosolids (bags)	<input type="checkbox"/> Class A, Alternative 2	<input type="checkbox"/> Option 2
<input type="checkbox"/> Surface disposal in a landfill	<input type="checkbox"/> Class A, Alternative 3	<input type="checkbox"/> Option 3
<input type="checkbox"/> Other surface disposal	<input type="checkbox"/> Class A, Alternative 4	<input type="checkbox"/> Option 4
<input type="checkbox"/> Incineration	<input type="checkbox"/> Class A, Alternative 5	<input type="checkbox"/> Option 5
	<input type="checkbox"/> Class A, Alternative 6	<input type="checkbox"/> Option 6
	<input checked="" type="checkbox"/> Class B, Alternative 1	<input type="checkbox"/> Option 7
	<input type="checkbox"/> Class B, Alternative 2	<input type="checkbox"/> Option 8
	<input type="checkbox"/> Class B, Alternative 3	<input type="checkbox"/> Option 9
	<input type="checkbox"/> Class B, Alternative 4	<input type="checkbox"/> Option 10
	<input type="checkbox"/> Domestic septage, pH adjustment	<input type="checkbox"/> Option 11

2.9 Identify the treatment process(es) used at your facility to reduce pathogens in sewage sludge or reduce the vector attraction properties of sewage sludge? (Check all that apply.)

<input checked="" type="checkbox"/> Preliminary operations (e.g., sludge grinding and degritting)	<input type="checkbox"/> Thickening (concentration)
<input type="checkbox"/> Stabilization	<input checked="" type="checkbox"/> Anaerobic digestion
<input type="checkbox"/> Composting	<input type="checkbox"/> Conditioning
<input type="checkbox"/> Disinfection (e.g., beta ray irradiation, gamma ray irradiation, pasteurization)	<input checked="" type="checkbox"/> Dewatering (e.g., centrifugation, sludge drying beds, sludge lagoons)
<input type="checkbox"/> Heat drying	<input type="checkbox"/> Thermal reduction
<input type="checkbox"/> Methane or biogas capture and recovery	

2.10 Describe any other sewage sludge treatment or blending activities not identified in Items 2.8 and 2.9 (Part 2, Section 2) above.

☐ Check here if you have attached the description to the application package.

**Preparation of Sewage Sludge Meeting Ceiling and Pollutant Concentrations, Class A Pathogen Requirements, and One of Vector Attraction Reduction Options 1 to 8**

2.11 Does the sewage sludge from your facility meet the ceiling concentrations in Table 1 of 40 CFR 503.13, the pollutant concentrations in Table 3 of 40 CFR 503.13, Class A pathogen reduction requirements at 40 CFR 503.32(a), and one of the vector attraction reduction requirements at 40 CFR 503.33(b)(1)–(8) and is it land applied?

☐ Yes ☒ No → SKIP to Item 2.14 (Part 2, Section 2) below.

2.12 Total dry metric tons per 365-day period of sewage sludge subject to this subsection that is applied to the land:

2.13 Is sewage sludge subject to this subsection placed in bags or other containers for sale or give-away for application to the land?

☐ Yes ☐ No

☐ Check here once you have completed Items 2.11 to 2.13, then → SKIP to Item 2.32 (Part 2, Section 2) below.



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Generation of Sewage Sludge or Preparation of a Material Derived from Sewage Sludge Continued

<b>Sale or Give-Away in a Bag or Other Container for Application to the Land</b>																													
2.14	Do you place sewage sludge in a bag or other container for sale or give-away for land application? <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input checked="" type="checkbox"/> No → SKIP to Item 2.17 (Part 2, Section 2) below.</span> </div>																												
2.15	Total dry metric tons per 365-day period of sewage sludge placed in a bag or other container at your facility for sale or give-away for application to the land:																												
2.16	Attach a copy of all labels or notices that accompany the sewage sludge being sold or given away in a bag or other container for application to the land. <input type="checkbox"/> Check here to indicate that you have attached all labels or notices to this application package.																												
<input type="checkbox"/> Check here once you have completed Items 2.14 to 2.16, then → SKIP to Part 2, Section 2, Item 2.32.																													
<b>Shipment Off Site for Treatment or Blending</b>																													
2.17	Does another facility provide treatment or blending of your facility's sewage sludge? (This question does not pertain to dewatered sludge sent directly to a land application or surface disposal site.) <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input checked="" type="checkbox"/> No → SKIP to Item 2.32 (Part 2, Section 2) below.</span> </div>																												
2.18	Indicate the total number of facilities that provide treatment or blending of your facility's sewage sludge. Provide the information in Items 2.19 to 2.26 (Part 2, Section 2) below for each facility. <input type="checkbox"/> Check here if you have attached additional sheets to the application package.																												
2.19	Name of receiving facility <hr/> Mailing address (street or P.O. box) <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">City or town</div> <div style="width: 15%;">State</div> <div style="width: 40%;">ZIP code</div> </div> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 35%;">Contact name (first and last)</div> <div style="width: 15%;">Title</div> <div style="width: 20%;">Phone number</div> <div style="width: 30%;">Email address</div> </div> <hr/> Location address (street, route number, or other specific identifier) <span style="float: right;"><input type="checkbox"/> Same as mailing address</span> <hr/> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;">City or town</div> <div style="width: 15%;">State</div> <div style="width: 40%;">ZIP code</div> </div>																												
2.20	Total dry metric tons per 365-day period of sewage sludge provided to receiving facility:																												
2.21	Does the receiving facility provide additional treatment to reduce pathogens in sewage sludge from your facility or reduce the vector attraction properties of sewage sludge from your facility? <div style="display: flex; justify-content: space-between;"> <span><input type="checkbox"/> Yes</span> <span><input type="checkbox"/> No → SKIP to Item 2.24 (Part 2, Section 2) below.</span> </div>																												
2.22	Indicate the pathogen class and reduction alternative and the vector attraction reduction option met for the sewage sludge at the receiving facility.																												
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 50%; background-color: #e0f0ff;">Pathogen Class and Reduction Alternative</th> <th style="width: 50%; background-color: #e0f0ff;">Vector Attraction Reduction Option</th> </tr> </thead> <tbody> <tr> <td><input type="checkbox"/> Not applicable</td> <td><input type="checkbox"/> Not applicable</td> </tr> <tr> <td><input type="checkbox"/> Class A, Alternative 1</td> <td><input type="checkbox"/> Option 1</td> </tr> <tr> <td><input type="checkbox"/> Class A, Alternative 2</td> <td><input type="checkbox"/> Option 2</td> </tr> <tr> <td><input type="checkbox"/> Class A, Alternative 3</td> <td><input type="checkbox"/> Option 3</td> </tr> <tr> <td><input type="checkbox"/> Class A, Alternative 4</td> <td><input type="checkbox"/> Option 4</td> </tr> <tr> <td><input type="checkbox"/> Class A, Alternative 5</td> <td><input type="checkbox"/> Option 5</td> </tr> <tr> <td><input type="checkbox"/> Class A, Alternative 6</td> <td><input type="checkbox"/> Option 6</td> </tr> <tr> <td><input type="checkbox"/> Class B, Alternative 1</td> <td><input type="checkbox"/> Option 7</td> </tr> <tr> <td><input type="checkbox"/> Class B, Alternative 2</td> <td><input type="checkbox"/> Option 8</td> </tr> <tr> <td><input type="checkbox"/> Class B, Alternative 3</td> <td><input type="checkbox"/> Option 9</td> </tr> <tr> <td><input type="checkbox"/> Class B, Alternative 4</td> <td><input type="checkbox"/> Option 10</td> </tr> <tr> <td><input type="checkbox"/> Domestic septage, pH adjustment</td> <td><input type="checkbox"/> Option 11</td> </tr> </tbody> </table>				Pathogen Class and Reduction Alternative	Vector Attraction Reduction Option	<input type="checkbox"/> Not applicable	<input type="checkbox"/> Not applicable	<input type="checkbox"/> Class A, Alternative 1	<input type="checkbox"/> Option 1	<input type="checkbox"/> Class A, Alternative 2	<input type="checkbox"/> Option 2	<input type="checkbox"/> Class A, Alternative 3	<input type="checkbox"/> Option 3	<input type="checkbox"/> Class A, Alternative 4	<input type="checkbox"/> Option 4	<input type="checkbox"/> Class A, Alternative 5	<input type="checkbox"/> Option 5	<input type="checkbox"/> Class A, Alternative 6	<input type="checkbox"/> Option 6	<input type="checkbox"/> Class B, Alternative 1	<input type="checkbox"/> Option 7	<input type="checkbox"/> Class B, Alternative 2	<input type="checkbox"/> Option 8	<input type="checkbox"/> Class B, Alternative 3	<input type="checkbox"/> Option 9	<input type="checkbox"/> Class B, Alternative 4	<input type="checkbox"/> Option 10	<input type="checkbox"/> Domestic septage, pH adjustment	<input type="checkbox"/> Option 11
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Generation of Sewage Sludge or Preparation of a Material Derived from Sewage Sludge Continued

2.36	Site name or number of surface disposal site you do not own or operate Please See Attachments Mailing address (street or P.O. box) <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 45%;">City or Town</div> <div style="width: 15%;">State</div> <div style="width: 35%;">ZIP Code</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 35%;">Contact Name (first and last)</div> <div style="width: 15%;">Title</div> <div style="width: 20%;">Phone Number</div> <div style="width: 30%;">Email Address</div> </div>		
2.37	Site Contact (Check all that apply.) <input type="checkbox"/> Owner <span style="margin-left: 100px;"><input type="checkbox"/> Operator</span>		
2.38	Total dry metric tons of sewage sludge from your facility placed on this surface disposal site per 365-day period:		varied, please see attachments
<b>Incineration</b>			
2.39	Is sewage sludge from your facility fired in a sewage sludge incinerator? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No → SKIP to Item 2.46 (Part 2, Section 2) below.</span>		
2.40	Total dry metric tons of sewage sludge from your facility fired in all sewage sludge incinerators per 365-day period:		
2.41	Do you own or operate all sewage sludge incinerators in which sewage sludge from your facility is fired? <input type="checkbox"/> Yes → SKIP to Item 2.46 (Part 2, Section 2) below. <span style="margin-left: 100px;"><input type="checkbox"/> No</span>		
2.42	Indicate the total number of sewage sludge incinerators used that you do not own or operate. (Provide the information in Items 2.43 to 2.45 directly below for each facility.) <input type="checkbox"/> Check here if you have attached additional sheets to the application package.		
2.43	Incinerator name or number Mailing address (street or P.O. box) <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 45%;">City or town</div> <div style="width: 15%;">State</div> <div style="width: 35%;">ZIP code</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 35%;">Contact name (first and last)</div> <div style="width: 15%;">Title</div> <div style="width: 20%;">Phone number</div> <div style="width: 30%;">Email address</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 70%;">Location address (street, route number, or other specific identifier)</div> <div style="width: 30%;"><input type="checkbox"/> Same as mailing address</div> </div> <div style="display: flex; justify-content: space-between; margin-top: 5px;"> <div style="width: 45%;">City or town</div> <div style="width: 15%;">State</div> <div style="width: 35%;">ZIP code</div> </div>		
2.44	Contact (check all that apply) <input type="checkbox"/> Incinerator owner <span style="margin-left: 100px;"><input type="checkbox"/> Incinerator operator</span>		
2.45	Total dry metric tons of sewage sludge from your facility fired in this sewage sludge incinerator per 365-day period:		
<b>Disposal in a Municipal Solid Waste Landfill</b>			
2.46	Is sewage sludge from your facility placed on a municipal solid waste landfill? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No → SKIP to Part 2, Section 3.</span>		
2.47	Indicate the total number of municipal solid waste landfills used. (Provide the information in Items 2.48 to 2.52 directly below for each facility.) <input type="checkbox"/> Check here if you have attached additional sheets to the application package.		

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MUNICIPAL SECTION



EPA Identification Number 100000033894		NPDES Permit Number AL0053201		Facility Name Gadsden West River WWTP		Form Approved 03/05/19 OMB No. 2040-0004	
Generation of Sewage Sludge or Preparation of a Material Derived from Sewage Sludge Continued	2.48 Name of landfill						
	Mailing address (street or P.O. box)						
	City or town				State		ZIP code
	Contact name (first and last)		Title		Phone number		Email address
	Location address (street, route number, or other specific identifier)						<input type="checkbox"/> Same as mailing address
	County			County code <input type="checkbox"/> Not available			
	City or town			State		ZIP code	
	2.49 Total dry metric tons of sewage sludge from your facility placed in this municipal solid waste landfill per 365-day period:						
	2.50 List the numbers of all other federal, state, and local permits that regulate the operation of this municipal solid waste landfill.						
	Permit Number		Type of Permit				
2.51 Attach to the application information to determine whether the sewage sludge meets applicable requirements for disposal of sewage sludge in a municipal solid waste landfill (e.g., results of paint filter liquids test and TCLP test). <input type="checkbox"/> Check here to indicate you have attached the requested information.							
2.52 Does the municipal solid waste landfill comply with applicable criteria set forth in 40 CFR 258? <input type="checkbox"/> Yes <input type="checkbox"/> No							

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PART 2, SECTION 3 LAND APPLICATION OF BULK SEWAGE SLUDGE (40 CFR 122.21(q)(9))

Land Application of Bulk Sewage Sludge

3.1	Does your facility apply sewage sludge to land? <input checked="" type="checkbox"/> Yes <span style="margin-left: 150px;"><input type="checkbox"/> No → SKIP to Part 2, Section 4.</span>																																				
3.2	Do any of the following conditions apply? <ul style="list-style-type: none"> <li>The sewage sludge meets the ceiling concentrations in Table 1 of 40 CFR 503.12, the pollutant concentrations in Table 3 of 40 CFR 503.13, Class A pathogen reduction requirements at 40 CFR 503.32(a), and one of the vector attraction reduction requirements at 40 CFR 503.33(b)(1)–(8);</li> <li>The sewage sludge is sold or given away in a bag or other container for application to the land; or</li> <li>You provide the sewage sludge to another facility for treatment or blending.</li> </ul> <input type="checkbox"/> Yes → SKIP to Part 2, Section 4. <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No</span>																																				
3.3	Complete Section 3 for every site on which the sewage sludge is applied. <input checked="" type="checkbox"/> Check here if you have attached sheets to the application package for one or more land application sites.																																				
Identification of Land Application Site																																					
3.4	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="4">Site name or number Farm Code - A08DJ2</td> </tr> <tr> <td colspan="3">Location address (street, route number, or other specific identifier) 2913 County Road 34</td> <td><input checked="" type="checkbox"/> Same as mailing address</td> </tr> <tr> <td>County Blount</td> <td colspan="2">County code 8</td> <td><input type="checkbox"/> Not available</td> </tr> <tr> <td>City or town Altoona</td> <td>State Alabama</td> <td colspan="2">ZIP code 35952</td> </tr> <tr> <td colspan="4" style="background-color: #e0f0ff; font-weight: bold;">Latitude/Longitude of Land Application Site (see instructions)</td> </tr> <tr> <td colspan="2" style="text-align: center; background-color: #e0f0ff;">Latitude</td> <td colspan="2" style="text-align: center; background-color: #e0f0ff;">Longitude</td> </tr> <tr> <td colspan="2" style="text-align: center;">34° 02' 52" N</td> <td colspan="2" style="text-align: center;">-86° 21' 55" W</td> </tr> <tr> <td colspan="4" style="background-color: #e0f0ff; font-weight: bold;">Method of Determination</td> </tr> <tr> <td colspan="4"> <input checked="" type="checkbox"/> USGS map <span style="margin-left: 50px;"><input type="checkbox"/> Field survey</span> <span style="margin-left: 50px;"><input type="checkbox"/> Other (specify) <u>Google Maps</u></span> </td> </tr> </table>	Site name or number Farm Code - A08DJ2				Location address (street, route number, or other specific identifier) 2913 County Road 34			<input checked="" type="checkbox"/> Same as mailing address	County Blount	County code 8		<input type="checkbox"/> Not available	City or town Altoona	State Alabama	ZIP code 35952		Latitude/Longitude of Land Application Site (see instructions)				Latitude		Longitude		34° 02' 52" N		-86° 21' 55" W		Method of Determination				<input checked="" type="checkbox"/> USGS map <span style="margin-left: 50px;"><input type="checkbox"/> Field survey</span> <span style="margin-left: 50px;"><input type="checkbox"/> Other (specify) <u>Google Maps</u></span>			
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3.5	Provide a topographic map (or other appropriate map if a topographic map is unavailable) that shows the site location. <input checked="" type="checkbox"/> Check here to indicate you have attached a topographic map for this site.																																				
Owner Information																																					
3.6	Are you the owner of this land application site? <input type="checkbox"/> Yes → SKIP to Item 3.8 (Part 2, Section 3) below. <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No</span>																																				
3.7	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="4">Owner name Danny Johnson</td> </tr> <tr> <td colspan="4">Mailing address (street or P.O. box) 2913 County Road 34</td> </tr> <tr> <td>City or town Altoona</td> <td>State Alabama</td> <td colspan="2">ZIP code 35952</td> </tr> <tr> <td>Contact name (first and last) Jeff Retzke</td> <td>Title Sr. Environmental Mgr.</td> <td>Phone number (256) 503-4300</td> <td>Email address jeff.retzke@denaliwater.com</td> </tr> </table>	Owner name Danny Johnson				Mailing address (street or P.O. box) 2913 County Road 34				City or town Altoona	State Alabama	ZIP code 35952		Contact name (first and last) Jeff Retzke	Title Sr. Environmental Mgr.	Phone number (256) 503-4300	Email address jeff.retzke@denaliwater.com																				
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Applier Information																																					
3.8	Are you the person who applies, or who is responsible for application of, sewage sludge to this land application site? <input type="checkbox"/> Yes → SKIP to Item 3.10 (Part 2, Section 3) below. <span style="margin-left: 100px;"><input checked="" type="checkbox"/> No</span>																																				
3.9	<table border="1" style="width:100%; border-collapse: collapse;"> <tr> <td colspan="4">Applier's name Denali Water</td> </tr> <tr> <td colspan="4">Mailing address (street or P.O. box) 3308 Bernice Avenue</td> </tr> <tr> <td>City or town Russleville</td> <td>State AR</td> <td colspan="2">ZIP code 72802</td> </tr> <tr> <td>Contact name (first and last) Jeff Retzke</td> <td>Title Sr. Environmental Mgr.</td> <td>Phone number (256) 503-4300</td> <td>Email address jeff.retzke@denaliwater.com</td> </tr> </table>	Applier's name Denali Water				Mailing address (street or P.O. box) 3308 Bernice Avenue				City or town Russleville	State AR	ZIP code 72802		Contact name (first and last) Jeff Retzke	Title Sr. Environmental Mgr.	Phone number (256) 503-4300	Email address jeff.retzke@denaliwater.com																				
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Land Application of Bulk Sewage Sludge Continued

Site Type											
3.10	Type of land application: <div style="display: flex; justify-content: space-between;"> <div> <input checked="" type="checkbox"/> Agricultural land  <input type="checkbox"/> Reclamation site  <input type="checkbox"/> Other (describe)         </div> <div> <input type="checkbox"/> Forest  <input type="checkbox"/> Public contact site         </div> </div>										
Crop or Other Vegetation Grown on Site											
3.11	What type of crop or other vegetation is grown on this site? Hay and pasture, with winter rye pasture										
3.12	What is the nitrogen requirement for this crop or vegetation? 260 PAN/ac/yr										
Vector Attraction Reduction											
3.13	Are the vector attraction reduction requirements at 40 CFR 503.33(b)(9) and (b)(10) met when sewage sludge is applied to the land application site? <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Yes         <div> <input checked="" type="checkbox"/> No → SKIP to Item 3.16 (Part 2, Section 3) below.         </div> </div>										
3.14	Indicate which vector attraction reduction option is met. (Check only one response.) <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Option 9 (injection below land surface)         <input type="checkbox"/> Option 10 (incorporation into soil within 6 hours)       </div>										
3.15	Describe any treatment processes used at the land application site to reduce vector attraction properties of sewage sludge. <input type="checkbox"/> Check here if you have attached your description to the application package.										
Cumulative Loadings and Remaining Allotments											
3.16	Is the sewage sludge applied to this site since July 20, 1993, subject to the cumulative pollutant loading rates (CPLRs) in 40 CFR 503.13(b)(2)? <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Yes         <div> <input checked="" type="checkbox"/> No → SKIP to Part 2, Section 4.         </div> </div>										
3.17	Have you contacted the NPDES permitting authority in the state where the bulk sewage sludge subject to CPLRs will be applied to ascertain whether bulk sewage sludge subject to CPLRs has been applied to this site on or since July 20, 1993? <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Yes         <div> <input type="checkbox"/> No → Sewage sludge subject to CPLRs may not be applied to this site. SKIP to Part 2, Section 4.         </div> </div>										
3.18	Provide the following information about your NPDES permitting authority: <table border="1" style="width: 100%; border-collapse: collapse; margin-top: 5px;"> <tr><td style="width: 40%;">NPDES permitting authority name</td><td></td></tr> <tr><td>Contact person</td><td></td></tr> <tr><td>Telephone number</td><td></td></tr> <tr><td>Email address</td><td></td></tr> </table>			NPDES permitting authority name		Contact person		Telephone number		Email address	
NPDES permitting authority name											
Contact person											
Telephone number											
Email address											
3.19	Based on your inquiry, has bulk sewage sludge subject to CPLRs been applied to this site since July 20, 1993? <div style="display: flex; justify-content: space-between;"> <input type="checkbox"/> Yes         <div> <input type="checkbox"/> No → SKIP to Part 2, Section 4.         </div> </div>										
3.20	Provide the following information for every facility other than yours that is sending, or has sent, bulk sewage sludge subject to CPLRs to this site since July 20, 1993. If more than one such facility sends sewage sludge to this site, attach additional pages as necessary. <input type="checkbox"/> Check here to indicate that additional pages are attached.										
	Facility name										
	Mailing address (street or P.O. box)										
	City or town	State	ZIP code								
	Contact name (first and last)	Title	Phone number								
			Email address								



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PART 2, SECTION 4 SURFACE DISPOSAL (40 CFR 122.21(q)(10))

Surface Disposal	4.1	Do you own or operate a surface disposal site? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to Part 2, Section 5.		
	4.2	Complete all items in Section 4 for each active sewage sludge unit that you own or operate. <input type="checkbox"/> Check here to indicate that you have attached material to the application package for one or more active sewage sludge units.		
	Information on Active Sewage Sludge Units			
	4.3	Unit name or number		
		Mailing address (street or P.O. box)		
		City or town	State	ZIP code
		Contact name (first and last)	Title	Phone number      Email address
		Location address (street, route number, or other specific identifier)		<input type="checkbox"/> Same as mailing address
		County	County code	<input type="checkbox"/> Not available
		City or town	State	ZIP code
	Latitude/Longitude of Active Sewage Sludge Unit (see instructions)			
		Latitude		Longitude
		°   '   "		°   '   "
	Method of Determination			
		<input type="checkbox"/> USGS map <input type="checkbox"/> Field survey <input type="checkbox"/> Other (specify) _____		
4.4	Provide a topographic map (or other appropriate map if a topographic map is unavailable) that shows the site location. <input type="checkbox"/> Check here to indicate that you have completed and attached a topographic map.			
4.5	Total dry metric tons of sewage sludge placed on the active sewage sludge unit per 365-day period:			
4.6	Total dry metric tons of sewage sludge placed on the active sewage sludge unit over the life of the unit:			
4.7	Does the active sewage sludge unit have a liner with a maximum permeability of $1 \times 10^{-7}$ centimeters per second (cm/sec)? <input type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 4.9 (Part 2, Section 4) below.			
4.8	Describe the liner. <input type="checkbox"/> Check here to indicate that you have attached a description to the application package.			
4.9	Does the active sewage sludge unit have a leachate collection system? <input type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 4.11 (Part 2, Section 4) below.			
4.10	Describe the leachate collection system and the method used for leachate disposal and provide the numbers of any federal, state, or local permit(s) for leachate disposal. <input type="checkbox"/> Check here to indicate that you have attached the description to the application package.			



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Surface Disposal Continued

4.11	Is the boundary of the active sewage sludge unit less than 150 meters from the property line of the surface disposal site?  <input type="checkbox"/> Yes <span style="margin-left: 200px;"><input type="checkbox"/> No → SKIP to Item 4.13 (Part 2, Section 4) below.</span>																
4.12	Provide the actual distance in meters: _____ meters																
4.13	Remaining capacity of active sewage sludge unit in dry metric tons: _____ dry metric tons																
4.14	Anticipated closure date for active sewage sludge unit, if known (MM/DD/YYYY): _____																
4.15	Attach a copy of any closure plan that has been developed for this active sewage sludge unit. <input type="checkbox"/> Check here to indicate that you have attached a copy of the closure plan to the application package.																
Sewage Sludge from Other Facilities																	
4.16	Is sewage sludge sent to this active sewage sludge unit from any facilities other than your facility?  <input type="checkbox"/> Yes <span style="margin-left: 200px;"><input type="checkbox"/> No → SKIP to Item 4.21 (Part 2, Section 4) below.</span>																
4.17	Indicate the total number of facilities (other than your facility) that send sewage sludge to this active sewage sludge unit. (Complete Items 4.18 to 4.20 directly below for each such facility.)  <input type="checkbox"/> Check here to indicate that you have attached responses for each facility to the application package.																
4.18	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="4">Facility name</td> </tr> <tr> <td colspan="4">Mailing address (street or P.O. box)</td> </tr> <tr> <td>City or town</td> <td>State</td> <td colspan="2">ZIP code</td> </tr> <tr> <td>Contact name (first and last)</td> <td>Title</td> <td>Phone number</td> <td>Email address</td> </tr> </table>	Facility name				Mailing address (street or P.O. box)				City or town	State	ZIP code		Contact name (first and last)	Title	Phone number	Email address
Facility name																	
Mailing address (street or P.O. box)																	
City or town	State	ZIP code															
Contact name (first and last)	Title	Phone number	Email address														
4.19	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td colspan="2" style="background-color: #e0f2f1; font-weight: bold;">Pathogen Class and Reduction Alternative</td> <td colspan="2" style="background-color: #e0f2f1; font-weight: bold;">Vector Attraction Reduction Option</td> </tr> <tr> <td colspan="2"> <input type="checkbox"/> Not applicable  <input type="checkbox"/> Class A, Alternative 1  <input type="checkbox"/> Class A, Alternative 2  <input type="checkbox"/> Class A, Alternative 3  <input type="checkbox"/> Class A, Alternative 4  <input type="checkbox"/> Class A, Alternative 5  <input type="checkbox"/> Class A, Alternative 6  <input type="checkbox"/> Class B, Alternative 1  <input type="checkbox"/> Class B, Alternative 2  <input type="checkbox"/> Class B, Alternative 3  <input type="checkbox"/> Class B, Alternative 4  <input type="checkbox"/> Domestic septage, pH adjustment         </td> <td colspan="2"> <input type="checkbox"/> Not applicable  <input type="checkbox"/> Option 1  <input type="checkbox"/> Option 2  <input type="checkbox"/> Option 3  <input type="checkbox"/> Option 4  <input type="checkbox"/> Option 5  <input type="checkbox"/> Option 6  <input type="checkbox"/> Option 7  <input type="checkbox"/> Option 8  <input type="checkbox"/> Option 9  <input type="checkbox"/> Option 10  <input type="checkbox"/> Option 11         </td> </tr> </table>	Pathogen Class and Reduction Alternative		Vector Attraction Reduction Option		<input type="checkbox"/> Not applicable <input type="checkbox"/> Class A, Alternative 1 <input type="checkbox"/> Class A, Alternative 2 <input type="checkbox"/> Class A, Alternative 3 <input type="checkbox"/> Class A, Alternative 4 <input type="checkbox"/> Class A, Alternative 5 <input type="checkbox"/> Class A, Alternative 6 <input type="checkbox"/> Class B, Alternative 1 <input type="checkbox"/> Class B, Alternative 2 <input type="checkbox"/> Class B, Alternative 3 <input type="checkbox"/> Class B, Alternative 4 <input type="checkbox"/> Domestic septage, pH adjustment		<input type="checkbox"/> Not applicable <input type="checkbox"/> Option 1 <input type="checkbox"/> Option 2 <input type="checkbox"/> Option 3 <input type="checkbox"/> Option 4 <input type="checkbox"/> Option 5 <input type="checkbox"/> Option 6 <input type="checkbox"/> Option 7 <input type="checkbox"/> Option 8 <input type="checkbox"/> Option 9 <input type="checkbox"/> Option 10 <input type="checkbox"/> Option 11									
Pathogen Class and Reduction Alternative		Vector Attraction Reduction Option															
<input type="checkbox"/> Not applicable <input type="checkbox"/> Class A, Alternative 1 <input type="checkbox"/> Class A, Alternative 2 <input type="checkbox"/> Class A, Alternative 3 <input type="checkbox"/> Class A, Alternative 4 <input type="checkbox"/> Class A, Alternative 5 <input type="checkbox"/> Class A, Alternative 6 <input type="checkbox"/> Class B, Alternative 1 <input type="checkbox"/> Class B, Alternative 2 <input type="checkbox"/> Class B, Alternative 3 <input type="checkbox"/> Class B, Alternative 4 <input type="checkbox"/> Domestic septage, pH adjustment		<input type="checkbox"/> Not applicable <input type="checkbox"/> Option 1 <input type="checkbox"/> Option 2 <input type="checkbox"/> Option 3 <input type="checkbox"/> Option 4 <input type="checkbox"/> Option 5 <input type="checkbox"/> Option 6 <input type="checkbox"/> Option 7 <input type="checkbox"/> Option 8 <input type="checkbox"/> Option 9 <input type="checkbox"/> Option 10 <input type="checkbox"/> Option 11															
4.20	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;">           Which treatment process(es) are used at the other facility to reduce pathogens in sewage sludge or reduce the vector attraction properties of sewage sludge before leaving the other facility? (Check all that apply.)   <input type="checkbox"/> Preliminary operations (e.g., sludge grinding and degritting)  <input type="checkbox"/> Stabilization  <input type="checkbox"/> Composting  <input type="checkbox"/> Disinfection (e.g., beta ray irradiation, gamma ray irradiation, pasteurization)  <input type="checkbox"/> Heat drying  <input type="checkbox"/> Methane or biogas capture and recovery         </td> <td style="width: 50%; vertical-align: top;"> <input type="checkbox"/> Thickening (concentration)  <input type="checkbox"/> Anaerobic digestion  <input type="checkbox"/> Conditioning  <input type="checkbox"/> Dewatering (e.g., centrifugation, sludge drying beds, sludge lagoons)  <input type="checkbox"/> Thermal reduction  <input type="checkbox"/> Other (specify) _____         </td> </tr> </table>	Which treatment process(es) are used at the other facility to reduce pathogens in sewage sludge or reduce the vector attraction properties of sewage sludge before leaving the other facility? (Check all that apply.)  <input type="checkbox"/> Preliminary operations (e.g., sludge grinding and degritting) <input type="checkbox"/> Stabilization <input type="checkbox"/> Composting <input type="checkbox"/> Disinfection (e.g., beta ray irradiation, gamma ray irradiation, pasteurization) <input type="checkbox"/> Heat drying <input type="checkbox"/> Methane or biogas capture and recovery	<input type="checkbox"/> Thickening (concentration) <input type="checkbox"/> Anaerobic digestion <input type="checkbox"/> Conditioning <input type="checkbox"/> Dewatering (e.g., centrifugation, sludge drying beds, sludge lagoons) <input type="checkbox"/> Thermal reduction <input type="checkbox"/> Other (specify) _____														
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Surface Disposal Continued	<b>Vector Attraction Reduction</b>			
	4.21	Which vector attraction reduction option, if any, is met when sewage sludge is placed on this active sewage sludge unit?		
		<input type="checkbox"/> Option 9 (Injection below and surface)	<input type="checkbox"/> Option 11 (Covering active sewage sludge unit daily)	
		<input type="checkbox"/> Option 10 (Incorporation into soil within 6 hours)	<input type="checkbox"/> None	
	4.22	Describe any treatment processes used at the active sewage sludge unit to reduce vector attraction properties of sewage sludge.		
		<input type="checkbox"/> Check here if you have attached your description to the application package.		
	<b>Groundwater Monitoring</b>			
	4.23	Is groundwater monitoring currently conducted at this active sewage sludge unit, or are groundwater monitoring data otherwise available for this active sewage sludge unit?		
		<input type="checkbox"/> Yes	<input type="checkbox"/> No → SKIP to Item 4.26 (Part 2, Section 4) below.	
	4.24	Provide a copy of available groundwater monitoring data.		
		<input type="checkbox"/> Check here to indicate you have attached the monitoring data.		
	4.25	Describe the well locations, the approximate depth to groundwater, and the groundwater monitoring procedures used to obtain these data.		
		<input type="checkbox"/> Check here if you have attached your description to the application package.		
	4.26	Has a groundwater monitoring program been prepared for this active sewage sludge unit?		
	<input type="checkbox"/> Yes	<input type="checkbox"/> No → SKIP to Item 4.28 (Part 2, Section 4) below.		
4.27	Submit a copy of the groundwater monitoring program with this permit application.			
	<input type="checkbox"/> Check here to indicate you have attached the monitoring program.			
4.28	Have you obtained a certification from a qualified groundwater scientist that the aquifer below the active sewage sludge unit has not been contaminated?			
	<input type="checkbox"/> Yes	<input type="checkbox"/> No → SKIP to Item 4.30 (Part 2, Section 4) below.		
4.29	Submit a copy of the certification with this permit application.			
	<input type="checkbox"/> Check here to indicate you have attached the certification to the application package.			
<b>Site-Specific Limits</b>				
4.30	Are you seeking site-specific pollutant limits for the sewage sludge placed on the active sewage sludge unit?			
	<input type="checkbox"/> Yes	<input type="checkbox"/> No → SKIP to Part 2, Section 5.		
4.31	Submit information to support the request for site-specific pollutant limits with this application.			
	<input type="checkbox"/> Check here to indicate you have attached the requested information.			



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004
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PART 2, SECTION 5 INCINERATION (40 CFR 122.21(q)(11))

Incineration	Incinerator Information		
	5.1	Do you fire sewage sludge in a sewage sludge incinerator? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No → SKIP to END.	
	5.2	Indicate the total number of incinerators used at your facility. (Complete the remainder of Section 5 for each such incinerator.) <input type="checkbox"/> Check here to indicate that you have attached information for one or more incinerators.	
	5.3	Incinerator name or number	
		Location address (street, route number, or other specific identifier)	
		County	County code <input type="checkbox"/> Not available
		City or town	State ZIP code
		Latitude/Longitude of Incinerator (see instructions)	
		Latitude	Longitude
		° ' "	° ' "
		Method of Determination	
		<input type="checkbox"/> USGS map <input type="checkbox"/> Field survey <input type="checkbox"/> Other (specify) _____	
	Amount Fired		
	5.4	Dry metric tons per 365-day period of sewage sludge fired in the sewage sludge incinerator:	
	Beryllium NESHAP		
	5.5	Submit information, test data, and a description of measures taken that demonstrate whether the sewage sludge incinerated is beryllium-containing waste and will continue to remain as such. <input type="checkbox"/> Check here to indicate that you have attached this material to the application package.	
	5.6	Is the sewage sludge fired in this incinerator "beryllium-containing waste" as defined at 40 CFR 61.31? <input type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 5.8 (Part 2, Section 5) below.	
	5.7	Submit with this application a complete report of the latest beryllium emission rate testing and documentation of ongoing incinerator operating parameters indicating that the NESHAP emission rate limit for beryllium has been and will continue to be met. <input type="checkbox"/> Check here to indicate that you have attached this information.	
	Mercury NESHAP		
	5.8	Is compliance with the mercury NESHAP being demonstrated via stack testing? <input type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 5.11 (Part 2, Section 5) below.	
5.9	Submit a complete report of stack testing and documentation of ongoing incinerator operating parameters indicating that the incinerator has met and will continue to meet the mercury NESHAP emission rate limit. <input type="checkbox"/> Check here to indicate that you have attached this information.		
5.10	Provide copies of mercury emission rate tests for the two most recent years in which testing was conducted. <input type="checkbox"/> Check here to indicate that you have attached this information.		
5.11	Do you demonstrate compliance with the mercury NESHAP by sewage sludge sampling? <input type="checkbox"/> Yes <input type="checkbox"/> No → SKIP to Item 5.13 (Part 2, Section 5) below.		
5.12	Submit a complete report of sewage sludge sampling and documentation of ongoing incinerator operating parameters indicating that the incinerator has met and will continue to meet the mercury NESHAP emission rate limit. <input type="checkbox"/> Check here to indicate that you have attached this information.		



EPA Identification Number 100000033894	NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004
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Incineration Continued	<b>Dispersion Factor</b>		
	5.13	Dispersion factor in micrograms/cubic meter per gram/second:	
	5.14	Name and type of dispersion model:	
	5.15	Submit a copy of the modeling results and supporting documentation. <input type="checkbox"/> Check here to indicate that you have attached this information.	
	<b>Control Efficiency</b>		
	5.16	Provide the control efficiency, in hundredths, for each of the pollutants listed below.	
		<b>Pollutant</b>	<b>Control Efficiency, in Hundredths</b>
		Arsenic	
		Cadmium	
		Chromium	
		Lead	
		Nickel	
	5.17	Attach a copy of the results or performance testing and supporting documentation (including testing dates). <input type="checkbox"/> Check here to indicate that you have attached this information.	
	<b>Risk-Specific Concentration for Chromium</b>		
	5.18	Provide the risk-specific concentration (RSC) used for chromium in micrograms per cubic meter:	
	5.19	Was the RSC determined via Table 2 in 40 CFR 503.43? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input type="checkbox"/> No → SKIP to Item 5.21 (Part 2, Section 5) below.</span>	
	5.20	Identify the type of incinerator used as the basis. <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> Fluidized bed with wet scrubber  <input type="checkbox"/> Fluidized bed with wet scrubber and wet electrostatic precipitator         </div> <div> <input type="checkbox"/> Other types with wet scrubber  <input type="checkbox"/> Other types with wet scrubber and wet electrostatic precipitator         </div> </div>	
	5.21	Was the RSC determined via Table 6 in 40 CFR 503.43 (site-specific determination)? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input type="checkbox"/> No → SKIP to Item 5.23 (Part 2, Section 5) below.</span>	
	5.22	Provide the decimal fraction of hexavalent chromium concentration to total chromium concentration in stack exit gas:	
	5.23	Attach the results of incinerator stack tests for hexavalent and total chromium concentrations, including the date(s) of any test(s), with this application. <input type="checkbox"/> Check here to indicate that you have attached this information. <span style="margin-left: 100px;"><input type="checkbox"/> Not applicable</span>	
<b>Incinerator Parameters</b>			
5.24	Do you monitor total hydrocarbons (THC) in the exit gas of the sewage sludge incinerator? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input type="checkbox"/> No</span>		
5.25	Do you monitor carbon monoxide (CO) in the exit gas of the sewage sludge incinerator? <input type="checkbox"/> Yes <span style="margin-left: 100px;"><input type="checkbox"/> No</span>		
5.26	Indicate the type of sewage sludge incinerator.		
5.27	Incinerator stack height in meters:		
5.28	Indicate whether the value submitted in Item 5.27 is (check only one response): <input type="checkbox"/> Actual stack height <span style="margin-left: 100px;"><input type="checkbox"/> Creditable stack height</span>		

EPA Identification Number 100000033894		NPDES Permit Number AL0053201	Facility Name Gadsden West River WWTP	Form Approved 03/05/19 OMB No. 2040-0004
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Incineration Continued	<b>Performance Test Operating Parameters</b>		
	5.29	Maximum performance test combustion temperature:	
	5.30	Performance test sewage sludge feed rate, in dry metric tons/day	
	5.31	Indicate whether value submitted in Item 5.30 is (check only one response): <input type="checkbox"/> Average use <input type="checkbox"/> Maximum design	
	5.32	Attach supporting documents describing how the feed rate was calculated. <input type="checkbox"/> Check here to indicate that you have attached this information.	
	5.33	Submit information documenting the performance test operating parameters for the air pollution control device(s) used for this sewage sludge incinerator. <input type="checkbox"/> Check here to indicate that you have attached this information.	
	<b>Monitoring Equipment</b>		
	5.34	List the equipment in place to monitor the listed parameters.	
		<b>Parameter</b>	<b>Equipment in Place for Monitoring</b>
		Total hydrocarbons or carbon monoxide	
		Percent oxygen	
		Percent moisture	
		Combustion temperature	
		Other (describe)	
	<b>Air Pollution Control Equipment</b>		
5.35	List all air pollution control equipment used with this sewage sludge incinerator. <input type="checkbox"/> Check here if you have attached the list to the application package for the noted incinerator.		

**END of PART 2**

**Submit completed application package to your NPDES permitting authority.**



# Field Loadings

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MUNICIPAL SECTION

# APPLICATION SUMMARY REPORT

For: 01/01/2021 to 12/31/2021

Source: West River-Gadsden, AL WWTP

Landowner	Field No	Acres	Crop	Dry Tons	Dry Tons	N (lb/ac)	P (lb/ac)	K (lb/ac)	Concentration of Pollutants (lb/ac)									
				Applied	Applied/Acre				As	Cd	Cr	Cu	Pb	Hg	Mo	Ni	Se	Zn
Dennis Burton, Sr	AL-BL-DB-1	75	Bermuda	283.31	3.79	36.43	190.79	5.53	0.0384	0.0214	0.4152	1.9364	1.3096	0.0049	0.0999	0.1634	0.0340	10.9526
Dennis Burton, Sr	AL-BL-DB-3	52	Bermuda	17.75	0.34	4.43	17.79	0.37	0.0037	0.0018	0.0354	0.1614	0.1198	0.0003	0.0050	0.0116	0.0015	1.0004
Dennis Burton, Sr	AL-BL-DB-4	41	Bermuda	6.49	0.16	2.50	8.40	0.17	0.0020	0.0008	0.0169	0.0734	0.0571	0.0001	0.0017	0.0053	0.0004	0.4713
Dennis Burton, Sr	AL-BL-DB-5	55	ida/Winter Gra	56.26	1.02	15.07	53.40	1.07	0.0122	0.0052	0.1069	0.4724	0.3618	0.0008	0.0122	0.0341	0.0032	2.9987
Majestik, LLC Nic Corn	AL-JA-NC-3	34	Fescue	9.18	0.27	2.96	13.81	0.44	0.0021	0.0019	0.0314	0.1277	0.0767	0.0002	0.0079	0.0113	0.0023	0.7069
Majestik, LLC Nic Corn	AL-JA-NC-5	16	Fescue	8.14	0.50	5.37	25.01	0.79	0.0039	0.0035	0.0569	0.2313	0.1390	0.0004	0.0144	0.0204	0.0041	1.2804
Bobby Turner	AL-MR-BT-2	5	eat/Soybeans	5.66	1.07	16.66	56.00	1.11	0.0133	0.0054	0.1124	0.4895	0.3805	0.0007	0.0113	0.0355	0.0027	3.1421
				531.18														

\* 531.18 Dry Short Tons = 481.78 Dry Metric Tons

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FEB 17 2023

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**Denali Water Solutions  
2021 Land Applier  
Certification Statements**



## Certification

"I certify, under penalty of law, that the information that will be used to determine compliance with the management practices in §503.14 and the site restrictions in §503.32(b)(5) was prepared for each site on which bulk sewage sludge was applied under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate this information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment."

Project(s): West River WWTP

Reporting Period: January - December 2021

Name: Randy Sollie

Denali Water

Signature:

*Randy Sollie*

Date: 2/3/2022

The management practices were met as follows:

- (a) Sites currently in agricultural production or drastically disturbed lands are not potential habitat for endangered species. Sites which are in a natural state and are converted to agricultural use are evaluated case by case.
- (b),(c) Biosolids are applied under management conditions to prevent the movement of biosolids into wetlands or other waters of the United States. These management practices include adherence to slope restrictions, seasonal water table restrictions, floodplain restrictions, frozen and snow covered soil restrictions, and maintaining buffer zones to surface waters (including the 10 meter set back to waters of the United States unless a reduced buffer zone requirement has been approved by the permitting authority) as required by state and internal operating standards.
- (d) Biosolids are applied at agronomic rates based on regional, state, and local crop nitrogen requirements. Reclamation rates are established directly with the permitting authority.

The site restrictions were met through written agreements with the landowner and/or farm operator (leaseholder) specifying their obligation to comply with the site restrictions.

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FEB 17 2023

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Alabama Department of Environmental Management  
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

MAY 21 2019

Chad Hare, General Manager  
Water Works & Sewer Board of the City of Gadsden  
Post Office Box 800  
Gadsden, AL 35901

RE: Warning Letter  
NPDES Permit No. AL0022659  
Gadsden East River WWTP  
Etowah County, Alabama

Dear Mr. Hare:

The Department has completed a comprehensive evaluation of the Gadsden East River WWTP in an effort to determine its compliance with applicable rules and provisions of the National Pollutant Discharge Elimination System (NPDES), ADEM Admin Code r. 335-6-6, and NPDES Permit No. AL0022659. This evaluation is based on all available inspection and sampling data, discharge monitoring reports (DMRs), and other self-reported compliance information for the period between May 2017 and May 2019. The Department noted the following deficiencies:

Permit condition I.A requires that discharges be limited and monitored as specified in the Permit. The DMRs for the monitoring periods listed below indicate that discharges from Outfall 001 did not comply with permit limitation for Ceriodaphnia Chronic Toxicity and Carbonaceous Biochemical Oxygen Demand (CBOD) Percent Removal.

Monitoring Period	Outfall	Parameter	Limit	Reported	Unit	Violation Type
August 2017	001T	Toxicity, Ceriodaphnia Chronic	0	1	pass(0)/fail(1)	Single Sample
February 2018	0011	CBOD % Removal	85.0	83.6	%	Monthly Average Minimum
November 2018	0011	CBOD % Removal	85.0	81.1	%	Monthly Average Minimum
December 2018	0011	CBOD % Removal	85.0	74.6	%	Monthly Average Minimum
January 2019	0011	CBOD % Removal	85.0	77	%	Monthly Average Minimum
February 2019	0011	CBOD % Removal	85.0	76.3	%	Monthly Average Minimum
March 2019	0011	CBOD % Removal	85.0	82	%	Monthly Average Minimum

Permit condition I.A requires that the monthly average discharge of Total Nitrogen Ammonia (NH<sub>3</sub>-N) be less than 20.0 mg/L. During the Department's October 24, 2018 Compliance Sampling Inspection (CSI), an effluent NH<sub>3</sub>-N sample concentration was 23.0 mg/L.

Ala. Code §22-22-9(i)(3) (2006 Rplc. Vol.) requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The following chart lists the unpermitted discharges in the form of Sanitary Sewer Overflows (SSOs) from May 2017 to May 2019.

Date/Time	Location	Volume	Duration
05/19/2017	610 Magnolia Ave., Gadsden, Al	60	2 hrs
06/23/2017	1124 Stillman Ave., Gadsden, Al	360	2 hrs
06/28/2017	1400 Poplar St.	1200	2 hrs
07/24/2017	100 20th St. N, Gadsden, Al	120	1 hr
08/11/2017	1124 Bonton Ave.	240	1 hr
12/14/2017	1115 Stillman Ave.	180	1 hr

Birmingham Branch  
110 Vulcan Road  
Birmingham, AL 35209-4702  
(205) 942-6168  
(205) 941-1603 (FAX)

Decatur Branch  
2715 Sandlin Road, S.W.  
Decatur, AL 35603-1333  
(256) 353-1713  
(256) 340-9359 (FAX)



Mobile Branch  
2204 Perimeter Road  
Mobile, AL 36615-1131  
(251) 450-3400  
(251) 479-2593 (FAX)

Mobile-Coastal  
3664 Dauphin Street, Suite B  
Mobile, AL 36608  
(251) 304-1176  
(251) 304-1189 (FAX)

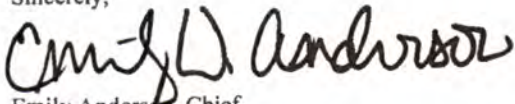


Date/Time	Location	Volume	Duration
03/02/2018	409 Herzberg Circle	20	1 hr 10 mins
03/24/2018	860 Goodyear Ave.	900	3 hrs
06/25/2018	235 Riverside Drive	300	1 hr
08/24/2018	608 Magnolia Ave.	240	2 hrs
12/09/2018	499 7th St S	3600	2 hrs
12/28/2018	499 7th St S.	4800	4 hrs
12/28/2018	2822 E Broad St	2400	4 hrs
12/28/2018	703 George Wallace Dr	6000	5 hrs
01/04/2019	499 7th St S Gadsden, AL	7800	5 hrs 30 mins
01/04/2019	499 7th St S	7800	6 hrs 30 mins
01/18/2019	1798 Woodside Avenue	1200	2 hrs
01/19/2019	701 George Wallace Drive	3600	4 hrs
02/19/2019	701 George Wallace Drive	4500	16 hrs
02/21/2019	701 George Wallace Drive	1,000-10,000	20 hrs 30 mins
02/22/2019	701 George Wallace Drive	1,000-10,000	20 hrs 15 mins
03/01/2019	3201 Gurley Avenue	900	45 mins

No later than 30 days from the date of this letter, please submit to the Department a report describing the steps that have been taken or will be taken to correct the permit noncompliances and SSOs.

If you have questions regarding this matter, please contact Dustin Stokes at (334) 271-7808.

Sincerely,



Emily Anderson, Chief  
Municipal Section  
Industrial/Municipal Branch  
Water Division

EDA/das

cc: Dustin Stokes, ADEM  
Mike Lankford, Water Works & Sewer Board of the City of Gadsden



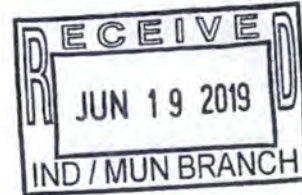


# The Water Works and Sewer Board of the City of Gadsden

515 Albert Rains Boulevard • P.O. Box 800 • Gadsden, AL 35902-0800  
(256) 543-2884 • FAX: (256) 543-7704

June 18, 2019

Mrs. Emily Anderson, Chief  
Municipal Section  
Industrial/Municipal Branch  
Water Division  
P. O. Box 301463  
Montgomery, AL, 36130-1463



**RE: Warning Letter – GWW&SB Response  
NPDES Permit No. AL0022659  
Gadsden East River WWTP  
Etowah County, Alabama**

Dear Mrs. Anderson:

This correspondence is in response to your recent request for a report describing the steps that have been taken, or will be taken, to correct permit noncompliances and SSOs associated with the East River WWTP (AL0022659), for the period between May 2017 and May 2019.

- A. In response to the noncompliance with permit limitation for Ceriodaphnia Chronic Toxicity in August 2017, our commercial testing lab had gone through a difficult transition. A longtime biological analyst passed away and less experienced analysts were conducting the toxicity testing. It is our understanding that several systems in Alabama had problems/concerns/discrepancies with toxicity testing during this period.

Koch Foods, who also utilizes our outfall, conducted toxicity sampling during the same time frame, using the exact same collected sample, with a different commercial testing lab, and no toxicity was noted. Because of the circumstances listed above, we made a request to the department to use Koch's report, from the same collected sample, but were denied. We were then asked by the department to perform a subsequent toxicity test. This follow-up test indicated no toxicity in the East River WWTP's effluent.

- B. In response to Carbonaceous Biochemical Oxygen Demand (CBOD) Percent Removal for February 2018, November 2018, December 2018, January 2019, February 2019, and March 2019, collection system personnel conducted multiple evaluations to try to determine cause(s) of additional inflow/infiltration. While nothing definitive was discovered diligent and continuous efforts were expended. Recent Sewer Maintenance Crew inspection, camera work, and pipe cleanup and maintenance work, have focused on low-lying manholes and sewer mains that would be impacted severely by rain events.

During the six (6) months in question, while the CBOD Percent Removal was exceeded, the East River WWTP averaged discharging a concentration of 10 mg/L of CBOD, which is forty percent (40%) of the permitted limit.



- C. In response to the Total Nitrogen Ammonia (NH<sub>3</sub>-N) collected during the Department's October 24, 2018, Compliance Sampling Inspection (CSI), showing a concentration of 23.0 mg/L, per our NPDES permit, the monthly average cannot exceed 20 mg/L, and the maximum weekly average cannot exceed 30.0 mg/L. As noted, the 23.0 mg/L concentration in the sample collected on October 24, 2018, exceeds 20.0 mg/L, however, for the month of October 2018, the East River WWTP had a monthly average, NH<sub>3</sub>-N concentration, of 9.2 mg/L and a maximum weekly average of 13.2 mg/L, neither of which exceeded NPDES permit limits.
- D. In response to Sanitary Sewer Overflows (SSOs) occurring between May 2017 and May 2019, within the East River WWTP collection system, please find below general steps pursued by GWWSB staff to eliminate SSOs:
1. GWWSB staff continues to perform camera work to evaluate collection system lines and identify problem areas requiring attention. Along with said camera work, we continue our efforts to digitally store the camera data gathered and to link it to our existing GIS mapping in accordance with NASSCO standards.
  2. GWWSB staff continues to identify and make recommendations for annual major sewer rehabilitation project(s).
  3. Individual collection system construction projects are performed, as needed, to eliminate line failures, line blockages, and infiltration and inflow.
  4. Individual manhole rehabilitation, as needed, to eliminate infiltration and inflow.
  5. GWWSB staff continues to perform ongoing collection system repair and maintenance.

The following information was gathered from field reports for the SSOs referenced in the warning letter:

- i. **Magnolia Avenue** (05/19/2017 and 08/24/2018) – line blockage of grease and debris. Blockage cleared, area cleaned, subsequent inspections. No further SSOs anticipated.
- ii. **Stillman Avenue** (06/23/2017 and 12/14/2017) – line blockage of grease and debris. Blockage cleared, area cleaned, subsequent inspections. No further SSOs anticipated.
- iii. **1408 Poplar Street** (06/28/2017) – Contractor failed to properly seal manhole, causing gravel to enter the main and blocking flow. Line cleared, area cleaned, subsequent inspection. No further SSOs anticipated.
- iv. **100 20<sup>th</sup> Street North** (07/24/2017) – line blockage of grease and debris. Blockage cleared, area cleaned, subsequent inspections. No further SSOs anticipated.
- v. **1124 Bonton Avenue** (08/11/2017) – line blockage caused by gravel intrusion during sewer rehabilitation project. Blockage cleared, area cleaned, subsequent inspections. No further SSOs anticipated.
- vi. **409 Herzberg Circle** (03/02/2018) – line blockage of grease and debris. Blockage cleared, area cleaned, subsequent inspections. No further SSOs anticipated.
- vii. **860 Goodyear Avenue** (03/24/2018) – air release valve on force main malfunctioned causing sewer discharge. Valve repaired, area cleaned, subsequent inspection of equipment. No further SSOs anticipated.
- viii. **235 Riverside Drive** (06/25/2018) – line blockage of grease and debris. Blockage cleared, area cleaned, subsequent inspections. No further SSOs anticipated.
- ix. **1798 Woodside Drive** (01/18/2019) – broken sewer main resulted in sewer discharge. Broken line repaired, area cleaned. No further SSOs anticipated.



- x. **3201 Gurley Avenue** (03/01/2019) –plug being used by sewer rehabilitation contractor released and became lodged in an unexpected/unanticipated section of collection system. Plug was removed, area cleaned. No further SSOs anticipated.
- xi. **2822 East Broad Street** (12/28/2018) – Historical rainfall, coming in successive deluges, overwhelmed collection system. Collection system is continuously inspected and evaluated for potential sources of inflow and infiltration (I & I), and repaired accordingly.
- xii. **499 7<sup>th</sup> Street South** (12/09/2018, 12/28/2018, 01/04/2019) – Historical rainfall, coming in successive deluges, overwhelmed collection system. Collection system is continuously inspected and evaluated for potential sources of inflow and infiltration (I & I), and repaired accordingly. This particular collection system location was found to be below flood plain. After evaluation and design, Gadsden Water Works & Sewer Board (GWWSB) personnel, raised section within flood plain by relaying the main. No further SSOs anticipated.
- xiii. **George Wallace Drive** (12/28/2018, 01/19/2019, 02/19/2019, 02/21/2019, 02/22/2019) – Historical rainfall, coming in successive deluges, overwhelmed collection system. Collection system is continuously inspected and evaluated for potential sources of inflow and infiltration (I & I), and repaired accordingly. This particular manhole, within the collection system was found to be at a low point in the collection system. After evaluation and design, Gadsden Water Works & Sewer Board (GWWSB) personnel raised the top (lid) elevation of this particular manhole above the flood plain elevation. No further SSOs anticipated.

E. GWWSB continues to utilize our Pretreatment program to eliminate problems due to fats, oils, and grease (FOG). Plans are to mail flyers to customers informing them on proper disposal of FOGs.

F. Efforts and expenditures spent within the East River WWTP collection system from May 2017 through May 2019:

- 1. Monetary expenditures within the East River WWTP collection system have totaled \$582,242.65, which included:
  - a. 2,482 – Linear Feet (LF) of 8" HDPE Pipe Bursting Rehab
  - b. 563 – LF of 10" HDPE Pipe Bursting Rehab
  - c. 495 – LF of 8" CIPP Rehab
  - d. 1,331 – LF of 10" CIPP Rehab
  - e. 3 – New HDPE Manholes
  - f. 25 – Service Tap Replacements
  - g. 11 – CIPP Service Tap Reinstatement
  - h. 188 – LF 4" Sewer Service Lateral
  - i. 4,871 – LF Cleaning and CCTV
  - j. 1 – Demolition of Existing Lift Station
  - k. 805 – LF of 8" PVC Gravity Sewer
  - l. 125 – LF of 6" PVC Gravity Sewer
  - m. 75 – LF of 4" PVC Gravity Sewer
  - n. 950 – LF 6" PVC Sewer Force Main
  - o. 4 – Precast Concrete Manholes
  - p. 3 – Cleanouts
  - q. 1 – 300 GPM Duplex Lift Station
  - r. 1 – Removal of Existing Force Main



2. Efforts expended and work performed by GWWSB staff within the East River WWTP Collection system from May 2017 through May 2019:
  - a. GWWSB Collections Systems Personnel and Inventory:
    - i. One (1) Supervisor, three (3) Equipment Operator I, and one (1) Semi-skilled laborer
    - ii. One (1) Vac-only truck
    - iii. One (1) Jet-only truck
    - iv. One (1) Jet/Vac truck
    - v. One (1) Camera truck
    - vi. One (1) Service truck
  - b. Not including collection system rehabilitation work and customer calls, GWWSB staff performed the following:
    - i. 32,332.91 LF of collection system mains cameraed, evaluated, jetted, and cleaned, as needed.

The Gadsden Water Works and Sewer Board remains committed to reducing, and eliminating, sanitary sewer problems for the benefit of our customers and the environment.

If we can be of any further assistance, please let us know.

Sincerely,

The Water Works & Sewer Board of the City of Gadsden, Alabama



Chad Hare, P.E.  
General Manager



Alabama Department of Environmental Management  
adem.alabama.gov

**JAN 06 2020**

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

Chad Hare, General Manager  
Water Works & Sewer Board of the City of Gadsden  
Post Office Box 800  
Gadsden, AL 35901

RE: Warning Letter  
NPDES Permit No. AL0053201  
Gadsden West River WWTP  
Etowah County, Alabama

Dear Mr. Hare:

The Department has completed a comprehensive evaluation of the Gadsden West River WWTP in an effort to determine its compliance with applicable rules and provisions of the National Pollutant Discharge Elimination System (NPDES), ADEM Admin Code r. 335-6-6, and NPDES Permit No. AL0053201. This evaluation is based on all available inspection and sampling data, discharge monitoring reports (DMRs), and other self-reported compliance information for the period between December 2017 and December 2019. The Department noted the following deficiencies:

Permit condition I.A requires that discharges be limited and monitored as specified in the Permit. The DMRs for the monitoring periods listed below indicate that discharges from Outfall 001 did not comply with permit limitation for Carbonaceous Biochemical Oxygen Demand (CBOD) Percent Removal and E. coli.

Monitoring Period	Outfall	Parameter	Limit	Reported	Unit	Violation Type
March 2018	0011	CBOD % Removal	85.0	80.0	%	Monthly Average Minimum
November 2018	0011	CBOD % Removal	85.0	84	%	Monthly Average Minimum
December 2018	0011	CBOD % Removal	85.0	83	%	Monthly Average Minimum
October 2019	0011	E. coli	298	1966	col/100mL	Maximum Daily

The Noncompliance Notification Forms (NCFs) submitted for the permit limitation noncompliances listed above indicate that heavy rains caused the noncompliances. In addition, the September 20, 2019 email and 2018 NCFs indicate that low influent CBOD concentrations also contributed to the noncompliances.

Ala. Code §22-22-9(i)(3) (2006 Rplc. Vol.) requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The following chart lists the unpermitted discharges in the form of Sanitary Sewer Overflows (SSOs) from December 2017 to December 2019.

Date/Time	Location	Volume (gallons)	Duration
*12/20/2017	400 N. 6th St.	540.00	3 hrs
*12/20/2017	401 N 11th St.	540.00	3 hrs
*12/20/2017	515 Bryan St	3600.00	2 hrs
*02/07/2018	400 N. 6th Street	720.00	2 hrs
*02/07/2018	408 N. 11th Street	720.00	2 hrs
02/08/2018	199 Silvey St., Rainbow City, Al	1200.00	2 hrs
*02/11/2018	515 Bryan St. Pump Station	4800.00	4 hrs
*02/11/2018	401 N. 11th St.	1800.00	3 hrs
*02/11/2018	400 N. 6th St.	1800.00	3 hrs
02/13/2018	905 Brookside Dr.	600.00	1 hr
02/16/2018	1282 Rainbow Drive	1440.00	8 hrs
05/02/2018	702 Tarrant Ct.	720.00	2 hrs
05/16/2018	4689 Airport Rd.	9000.00	1 hr 30 mins
06/19/2018	2312 Sansom Ave.	180.00	1 hr
06/28/2018	597 Van del Blvd.	1200.00	1 hr





Date/Time	Location	Volume (gallons)	Duration
07/04/2018	Rosemount Pump Station 3800 Roselawn Drive	100.00	1 hr 59 mins
08/08/2018	2200 Industrial Avenue	4320.00	21 hrs
*09/27/2018	1323 Jackson Ave. MH#4595	360.00	2 hrs
*11/12/2018	93 River Road	1800.00	56 mins
*11/12/2018	23 River Road	600.00	1 hr 9 mins
*12/01/2018	400 N. 6th St.	180.00	3 hrs
*12/08/2018	400 N 6th St	4200.00	14 hrs
*12/28/2018	AL - 759 E	300.00	1 hr
*12/28/2018	404 N. 6th St.	2400.00	8 hrs
*12/28/2018	1329 Jackson Ave.	180.00	3 hrs
12/29/2018	2476 Chesnut St.	1200.00	1 hr
*01/04/2019	400 N 6th Street	3150.00	10 hrs 30 mins
*01/04/2019	400 N 11th Street	1500.00	5 hrs
*01/19/2019	408 N. 11th St.	7800.00	5 hrs 30 mins
*01/19/2019	400 N. 6th St.	1950.00	5 hrs 30 mins
*01/23/2019	400 N. 6th St	3900.00	13 hrs
*01/23/2019	408 N. 11th St	9450.00	22 hrs 30 mins
*01/24/2019	28 Cabot Avenue	150.00	30 mins
*02/17/2019	406 N. 6th Street	2520.00	15 hrs
*02/17/2019	404 N. 11th Street	9600.00	20 hrs
*02/19/2019	404 N. 11th Street	25,000-50,000	140 hrs 30 mins
*02/19/2019	406 N. 6th Street	10,000-25,000	161 hrs 30 mins
*02/19/2019	4688 Airport Road	8400.00	16 hrs
*02/21/2019	4688 Airport Road	900.00	45 mins
*02/21/2019	1324 Jackson Avenue	450.00	1 hr 30 mins
*02/22/2019	1324 Jackson Avenue	750.00	2 hrs 30 mins
05/31/2019	Morningview Drive, Gadsden AL	50.00	15 mins
06/05/2019	419 Roslyn Drive, Gadsden, AL	75.00	35 mins
*10/25/2019	419 Roslyn Drive	315.00	1 hr 3 mins
*10/25/2019	301 N 6th Pl	5325.00	17 hrs 45 mins
*10/25/2019	402 N 11th Street	8325.00	29 hrs 45 mins
12/4/2019	912 Willow Street	3150.00	1 hr 3 mins
*12/22/2019	301 N 6th Place	9200.00	15 hrs 20 mins
*12/22/2019	402 N 11th Street	7875.00	17 hrs 30 mins
*12/23/2019	515 Bryan Street	2660.00	4 hrs 26 mins
*12/23/2019	1884 Rainbow Drive	4875.00	3 hrs 15 mins
*12/23/2019	4688 Airport Road	1400.00	2 hrs 20 mins

\*Report indicates SSO caused by wet weather.

No later than 30 days from the date of this letter, please submit to the Department a report describing the steps that have been taken or will be taken to investigate the less concentrated influent CBOD and to correct the SSOs that occurred due to wet weather (specifically addressing the 6<sup>th</sup> Street and 11<sup>th</sup> Street area).

If you have questions regarding this matter, please contact Dustin Stokes at (334) 271-7808.

Sincerely,



Emily Anderson, Chief  
Municipal Section  
Industrial/Municipal Branch  
Water Division

EDA/das

cc: Dustin Stokes, ADEM  
Mike Lankford, Water Works & Sewer Board of the City of Gadsden



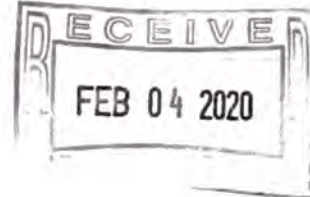


# The Water Works and Sewer Board of the City of Gadsden

515 Albert Rains Boulevard • P.O. Box 800 • Gadsden, AL 35902-0800  
(256) 543-2884 • FAX: (256) 543-7704

January 31, 2020

Mrs. Emily Anderson, Chief  
Municipal Section  
Industrial/Municipal Branch  
Water Division  
P. O. Box 301463  
Montgomery, AL, 36130-1463



**RE: Warning Letter**  
**NPDES Permit No. AL0053201**  
**Gadsden West River WWTP**  
**Etowah County, Alabama**

Dear Mrs. Anderson:

This correspondence is in response to your recent request for a report describing the steps that have been taken, or will be taken, to correct permit noncompliances and Sanitary Sewer Overflows (SSOs) associated with the West River WWTP (NPDES Permit No. AL0053201), for the period between December 2017 and December 2019.

- A. In response to Carbonaceous Biochemical Oxygen Demand (CBOD) Percent Removal for March 2018, November 2018, December 2018, sanitary sewer collection system personnel conducted multiple evaluations to try to determine cause(s) of additional inflow/infiltration. Extensive time and effort have been, and continues to be, expended to ascertain any possible contributor to the West River WWTP's obviously weakened influent. While nothing definitive has, to-date, been discovered, diligent and continuous efforts are ongoing.
1. Over the last twenty (20) years, the Gadsden West River WWTP has experienced an influent BOD/CBOD averaging just 64.8 milligrams per liter (mg/L), with the highest monthly average influent BOD in the last 20 years occurring in 2007 at 82 mg/L. That year (2007) was a drought year, with the Gadsden area receiving a total of 22 inches (22") of rain for the entire year. In 2009, one of the wettest years Gadsden has experienced in the last 20 years, receiving 67 inches of rain, the average influent BOD/CBOD was 67 mg/L, slightly higher than the 20-year average. Again, after extensive evaluation and study, nothing definitive has been found to contribute to the low influent BOD/CBOD.
  2. During the five (5) year span of calendar year 2000 to 2004, the Gadsden West River WWTP recorded an effluent BOD/CBOD concentration of nearly 14 mg/L, while in the last five (5) years, 2015 to 2019, the Gadsden West River WWTP has discharged an average effluent BOD/CBOD concentration of 6.7 mg/L; less than half of what it was 15-20 years ago. The reduction in average effluent BOD/CBOD concentration has probably reduced BOD/CBOD loading on the receiving stream by at least 733,551 pounds over the last five (5) years, based on the average flow during that period. When calculated using the average flow from 2000-2004, the reduction would be closer to one million (1,000,000) pounds.



3. The average flow at the Gadsden West River WWTP from 2000–2004 was 9.19 million gallons per day (MGD), while over the last five (5) years, which have had at least average rainfall, the average flow at the Gadsden West River WWTP has been 6.98 MGD; a reduction of over 2.2 MGD. The reduced flow over the last 20 years would indicate significant improvements in the collection system, reducing inflow and infiltration (I & I), which should have also increased the influent BOD/CBOD concentration. However, again, after extensive evaluation and study, nothing definitive has been found to contribute to the historically low influent BOD/CBOD concentration.
  4. While the Gadsden West River WWTP has failed to meet the 85% removal parameter on a few occasions, the average effluent CBOD concentration from the plant has been 6.7 mg/L over the last five (5) years; 67% below the current discharge limit of 20 mg/L.
- B. In response to the October 2019 E. coli daily maximum exceedance, the Gadsden area had experienced heavy rains prior to the one (1) sample in question, which in turn lowered our effluent residual chlorine. While the chlorine residual, on the day the sample was collected, was 0.26 mg/L, the sample still failed. Upon evaluation, there may have been sampler contamination of the sample, but it could not be unequivocally proven. It is also worth noting that the succeeding two (2) months, November 2019 and December 2019, the E. coli daily maximums were 172 mg/L and 178 mg/L, respectively. Corrective actions such as proper sample collection techniques have been reviewed with appropriate GWWSB personnel, and we will evaluate the need to increase the effluent chlorinator capacity.
- C. In response to SSOs occurring between December 2017 and December 2019, within the Gadsden West River WWTP collection system, please find below, and in attached documentation, general and specific steps pursued by GWWSB staff to eliminate SSOs:
1. GWWSB staff continues to perform daily camera work to evaluate sanitary sewer collection system lines and identify problem areas requiring further attention. Along with this camera work, we continue our efforts to digitally store the camera inspection information and link it to our existing GIS mapping in accordance with National Association of Sewer Service Companies (NASSCO) standards.
  2. GWWSB staff continues to identify and make recommendations for annual major sewer rehabilitation project(s).
  3. Individual collection system construction projects are performed, as needed, to eliminate line failures, line blockages, and infiltration and inflow.
  4. Individual manhole rehabilitation is performed, as needed, to eliminate infiltration and inflow.
  5. GWWSB staff continually performs sanitary sewer collection system repair and maintenance.
  6. Individual SSOs, beginning with single discharges and progressing through the more prevalent locations, are addressed below:
    - i. **199 Silvey Street (RBC)** (02/08/2018) – line blockage of debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
    - ii. **905 Brookside Drive** (02/13/2018) – line blockage of debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
    - iii. **1282 Rainbow Drive** (02/16/2018) – line blockage of grease and debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.



- iv. **702 Tarrant Court** (05/02/2018) – line blockage of grease and debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
- v. **2312 Sansom Avenue** (06/19/2018) – line blockage of grease. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
- vi. **597 Vandell Blvd.** (06/28/2018) – Power failure at Walnut Street Pump Station. Area cleaned. Pump stations are inspected routinely. No further SSOs are anticipated.
- vii. **3800 Roselawn Drive** (07/04/2018) – SSO caused by pumps losing power. Pumps restarted, area cleaned, and subsequent inspections performed. Pump stations are inspected routinely. No further SSOs are anticipated.
- viii. **2200 Industrial Avenue** (08/08/2018) – Pipe joint leak. Pipe was repaired, area cleaned. No further SSOs are anticipated.
- ix. **2476 Chestnut Street** (12/29/2018) – line blockage of debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
- x. **Morningview Drive** (05/31/2019) – line blockage of grease and debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
- xi. **912 Willow Street** (12/04/2019) – line blockage of grease and debris. Blockage cleared, area cleaned, and subsequent inspections performed. No further SSOs are anticipated.
- xii. **28 Cabot Avenue** (1/24/2019) – line blockage of grease and debris. Blockage cleared, area cleaned, and subsequent inspections performed. The Gadsden area had also received 2.3” of rain in the previous 72 hours. No further SSOs are anticipated.
- xiii. **419 Roslyn Drive** (10/25/2019) – line blockage of grease and debris. Blockage cleared, area cleaned, and subsequent inspections performed. The Gadsden area had also received approximately 5” of rain in the previous 72 hours. No further SSOs are anticipated.
- xiv. **1884 Rainbow Drive** (10/25/2019) – Overflow occurred when manhole lid was removed to inspect for surcharge; no overflow had occurred prior to manhole lid being removed for evaluation. The area was cleaned and subsequent inspections were performed. The Gadsden area had also received approximately 5” of rain in the previous 72 hours. No further SSOs are anticipated.
- xv. **I-759 East** (12/28/2018) – Overflow caused by excessive rainfall. The Gadsden area had received approximately 2.6” of rain in the previous 72 hours. The area was cleaned and subsequent inspections were performed. After evaluation, the manhole lid elevation was raised, with no further discharges occurring since the improvement. No further SSOs are anticipated.
- xvi. **23 River Road and 93 River Road** (11/12/2018) – Overflow caused by excessive rainfall. The Gadsden area had received approximately 2.6” of rain in the previous 72 hours. The area was cleaned and subsequent inspections were performed. After evaluation, these manhole lid elevations were raised, with no further discharges occurring since the improvements. No further SSOs are anticipated.
- xvii. **1323 Jackson Avenue, 1324 Jackson Avenue, and 1329 Jackson Avenue** (09/27/2018, 12/28/2018, 02/21/2019, 02/22/2019) – Overflow caused by excessive rainfall. In the 72 hours leading up to 09/27/2018, the Gadsden area had received approximately 2.8” of rain; in the 72 hours leading up to



12/28/2018, the Gadsden area had received approximately 2.6" of rain, and in February of 2019, the Gadsden area received over 11" of rain. Governor Kay Ivey issued a State of Emergency for Flooding in Etowah County in February 2019, due to the extreme amounts of rain the area received. After each SSO, the area was cleaned, and subsequent inspections were performed. After evaluation, these manholes were bolted shut, with no further discharges occurring since the construction. No further SSOs are anticipated.

- xviii. **515 Bryan Street (Pump Station)** (02/11/2018, 12/23/2019) – Overflow caused by excessive rainfall. The Gadsden area had received approximately 2.5" of rain in the 72 hours prior to 02/11/2018, and 4.2" prior to 12/23/2019. The area was cleaned and subsequent inspections were performed. The pump station is routinely inspected, and equipment evaluated for need of upgrading or replacement. Also, inspections and improvements continue within the collection basin feeding into this pump station. No further SSOs are anticipated.
- xix. **400 North 11<sup>th</sup> Street, 401 North 11<sup>th</sup> Street, 402 North 11<sup>th</sup> Street, 404 North 11<sup>th</sup> Street, and 408 North 11<sup>th</sup> Street** (12/20/2017, 02/07/2018, 02/11/2018, 01/04/2019, 01/19/2019, 01/23/2019, 02/17/2019, 02/19/2019, 10/25/2019, 12/22/2019) – Overflows caused by excessive rainfall. In the 72 hours leading up to 12/20/2017, the Gadsden area received approximately 2.2" of rain; in the 72 hours leading up to 02/07/2018, the Gadsden area received approximately 2" of rain; in the 72 hours leading up to 02/11/2018, the Gadsden area received approximately 2.5" of rain; in the 72 hours leading up to 01/04/2019, the Gadsden area received approximately 2" of rain; in the 72 hours leading up to 01/19/2019, the Gadsden area received approximately 2" of rain; in the 72 hours leading up to 01/23/2019, the Gadsden area received approximately 2.3" of rain; in the 72 hours leading up to 02/17/2019, the Gadsden area received approximately 2.3" of rain; in the 72 hours leading up to 02/19/2019, the Gadsden area received approximately 3.4" of rain, and in February of 2019, the Gadsden area received over 11" of rain. In the 72 hours leading up to 10/25/2019, the Gadsden area received approximately 5" of rain; and in the 72 hours leading up to 12/22/2019, the Gadsden area received approximately 4.3" of rain. Governor Kay Ivey issued a State of Emergency for Etowah County in February 2019 due to the extreme amounts of rain the area received. After each SSO, the areas were cleaned and subsequent inspections were performed. Gadsden Water has expended vast resources evaluating this area (see attached spreadsheets and maps). Evaluations of this area are ongoing and further improvements are planned, but with the inspections, cleaning, and efforts put forth by Gadsden Water personnel, we do not anticipate further SSOs.
- xx. **400 North 6<sup>th</sup> Street, 404 North 6<sup>th</sup> Street, 406 North 6<sup>th</sup> Street, and 301 North 6<sup>th</sup> Place** (12/20/2017, 02/07/2018, 02/11/2018, 12/01/2018, 12/08/2018, 12/28/2018, 01/04/2019, 01/19/2019, 01/23/2019, 02/17/2019, 02/19/2019, 10/25/2019, 12/22/2019) – Overflows caused by excessive rainfall. In the 72 hours leading up to 12/20/2017, the Gadsden area received approximately 2.2" of rain; in the 72 hours leading up to 02/07/2018, the Gadsden area received approximately 2" of rain; in the 72 hours leading up to 02/11/2018, the Gadsden area received approximately 2.5" of rain; in the 72 hours leading up to 12/01/2018, the Gadsden area received approximately 2" of rain; in the 72 hours leading up to 12/08/2018, the Gadsden area received approximately 4" of rain; in the 72 hours leading up to 12/28/2018, the Gadsden area received approximately 2.6" of rain; in the 72 hours leading up to 01/04/2019, the Gadsden area received approximately 2" of rain; in the 72 hours leading up to 01/19/2019, the Gadsden



area received approximately 2" of rain; in the 72 hours leading up to 01/23/2019, the Gadsden area received approximately 2.3" of rain; in the 72 hours leading up to 02/17/2019, the Gadsden area received approximately 2.3" of rain; in the 72 hours leading up to 02/19/2019, the Gadsden area received approximately 3.4" of rain, and in February of 2019, the Gadsden area received over 11" of rain. In the 72 hours leading up to 10/25/2019, the Gadsden area received approximately 5" of rain; and in the 72 hours leading up to 12/22/2019, the Gadsden area received approximately 4.3" of rain. Governor Kay Ivey issued a State of Emergency in Etowah County in February 2019 due to the extreme amounts of rain the area received. After each SSO, the areas were cleaned and subsequent inspections were performed. Gadsden Water has expended vast resources evaluating this area (see attached spreadsheets and maps). The manhole closest to 400 North 6<sup>th</sup> Street has been bolted shut. In this section of Gadsden Water's collection system, one (1) of the contributing factors to blockages was excessive debris from the Etowah County Detention Center. After several discussions and work sessions with County personnel, the County installed a mechanical bar screen, which has greatly reduced the amount of trash in the collection system and subsequently reduced the potential for blockages in this area. Evaluations and improvements within this collection basin have been made, are ongoing, and are planned. With the inspections, cleaning, and efforts put forth by Gadsden Water personnel, we do not anticipate further SSOs.

- xxi. **4688 Airport Road and 4689 Airport Road** (05/16/2018, 02/19/2019, 02/21/2019, 12/23/2019) – Overflows caused by excessive rainfall. However, the 05/16/2018 discharge was caused by a power failure to the backup pump. The situation was evaluated and the pump started. In the 72 hours leading up to 02/19/2019, the Gadsden area had received approximately 3.4" of rain; in the 72 hours leading up to 02/21/2019, the Gadsden area received approximately 4.1" of rain; and, in February of 2019, the Gadsden area received over 11" of rain. In the 72 hours leading up to 12/23/2019, the Gadsden area received approximately 4.3" of rain. Governor Kay Ivey issued a State of Emergency in Etowah County in February 2019, due to the extreme amounts of rain the area received. After each SSO, the area was cleaned and subsequent inspections were performed. Gadsden Water has evaluated this pump station for upgrades, as well as the collection main this station pumps in to. Gadsden Water is currently working with the East Alabama Regional Planning Commission and an engineering consulting firm to submit an EDA grant application for these improvements. Evaluations of this area are ongoing and future improvements to this area will reduce infiltration and inflow, as well as add capacity to the system, but with the inspections, cleaning, and efforts put forth by Gadsden Water personnel, we do not anticipate further SSOs.

- D. GWWSB continues to utilize our Pretreatment program to eliminate problems due to fats, oils, and grease (FOG). Plans are to mail flyers to customers informing them on proper disposal of FOGs.
- E. Some of the significant efforts and expenditures spent within the Gadsden West River WWTP collection system from December 2017 through December 2019 include, but are not limited to, the following:
  - 1. There have been significant monetary expenditures within the Gadsden West River WWTP collection system, which are difficult to calculate when a majority of the



work has been performed utilizing Gadsden Water employees and resources (please see attachments).

- a. The Etowah County Jail screen expenditures totaled approximately \$150,000.
2. Efforts expended and work performed by GWWSB staff within the Gadsden West River WWTP Collection system from December 2017 through December 2019:
  - a. GWWSB Collections Systems Personnel and Inventory:
    - i. One (1) Supervisor and three (3) Equipment Operator I
    - ii. One (1) Vac-only truck
    - iii. One (1) Jet-only truck
    - iv. One (1) Jet/Vac truck
    - v. One (1) Camera truck
    - vi. One (1) Service truck
  - b. Not including collection system rehab work and customer calls, the GWWSB performed the following:
    - i. 240,797 LF of collection system mains cameraed, evaluated, jetted, and cleaned, as warranted. Of this total, 80,531 LF was conducted within basins experiencing repeat SSOs (please see attached documentation).
    - ii. 959 manholes were inspected; with 244 of those within basins experiencing repeat SSOs (please see attached documentation).
    - iii. Specifically addressing 6<sup>th</sup> Street and 11<sup>th</sup> Street areas:
      1. Each of these manholes are in low-lying, difficult to alter locations. As reported, though, significant evaluations, improvements, and resources have been conducted and expended in these two (2) areas.
      2. With each rain event, these two (2), along with other, areas are monitored and evaluated.
      3. Because of all the attention directed to these particular areas, based upon observations, Gadsden Water feels that we are making significant improvements.
    - iv. In the attached documentation, we have included efforts and resources expended in the Margaret Street basin. While this basin is associated with the East River WWTP (NPDES Permit No. AL0022659), we wanted to provide information about our efforts.
3. The inspection and evaluation work listed above and performed previously led to the Gadsden Water Board recently approving three (3) Indefinite Delivery Indefinite Quantity (IDIQ) bids for capital sewer improvement projects. These bids set the maximum amount of each type rehabilitation/replacement that can be performed under each individual contract annually, and are as follows:
  - a. Periodic Bid for Sewer Manhole Rehabilitation to Gulf Coast Underground, LLC in the amount of \$278,100.00.
  - b. Periodic Bid for Rehabilitation by Cured-In-Place Pipe Lining to Gulf Coast Underground, LLC in the amount of \$991,478.00.
  - c. Periodic Bid for Sewer Rehabilitation by Pipe Bursting to LTS Construction, LLC in the amount of \$844,291.00.



The details found in this report and subsequent attachments should provide evidence of the efforts performed and the commitment of Gadsden Water to reducing, and eliminating, sanitary sewer problems for the benefit of our customers, and the environment.

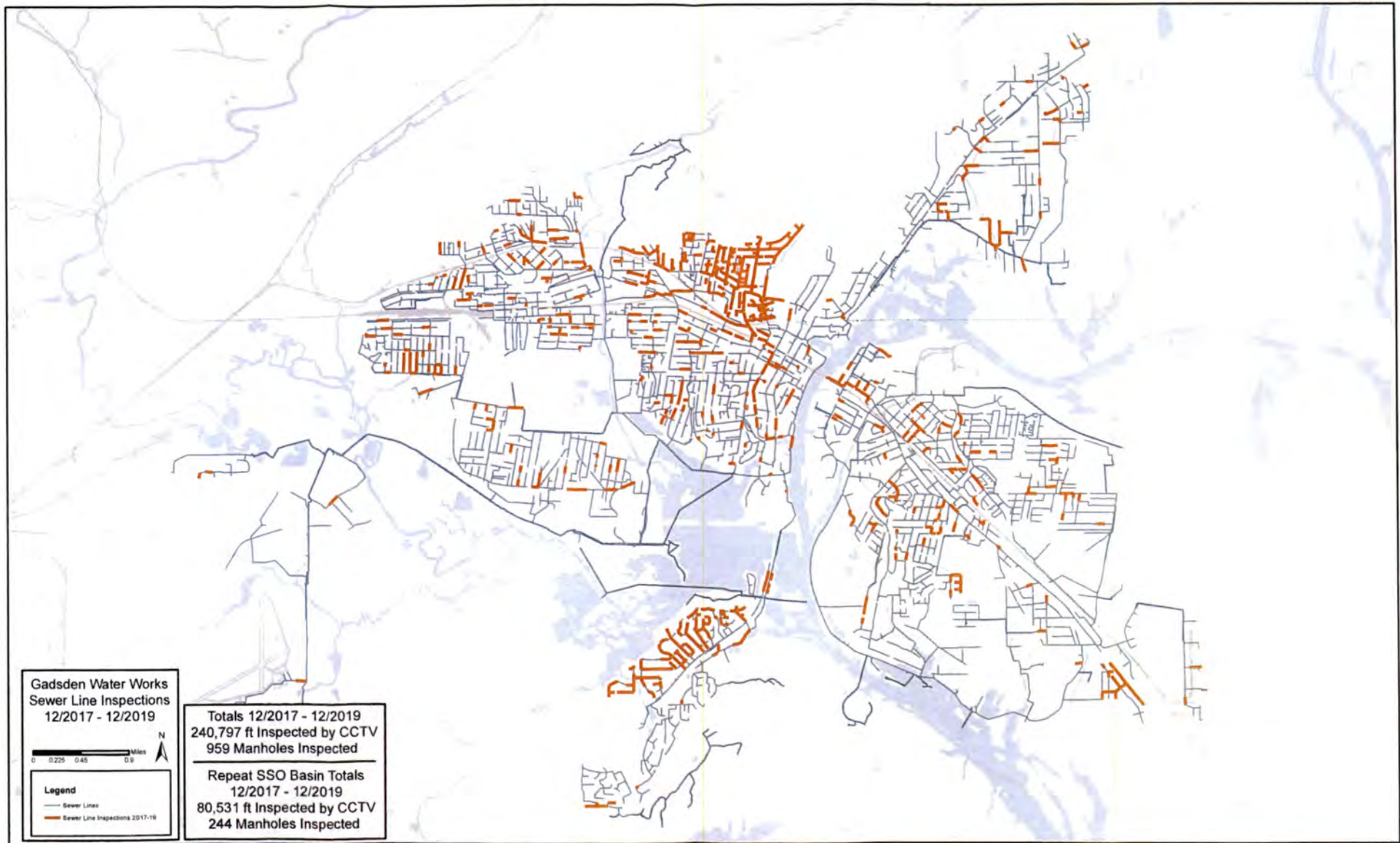
If you have questions about any of the information provided or would like to discuss any issue further, please do not hesitate to call.

Sincerely,

THE WATER WORKS AND SEWER BOARD OF THE CITY OF GADSDEN, ALABAMA

A handwritten signature in blue ink, appearing to read 'CHAD HARE', is positioned above the printed name.

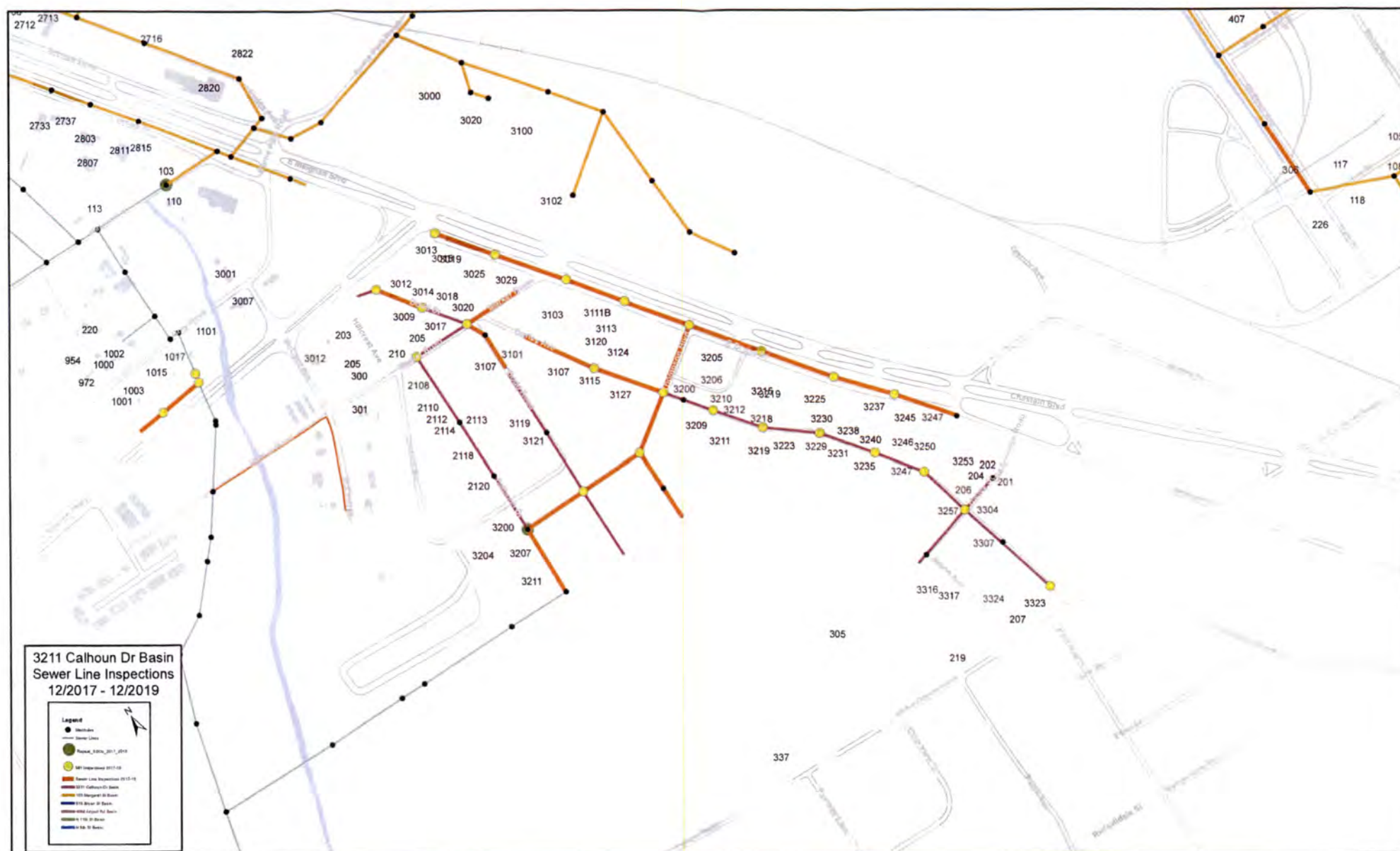
Chad Hare, P.E.  
General Manager



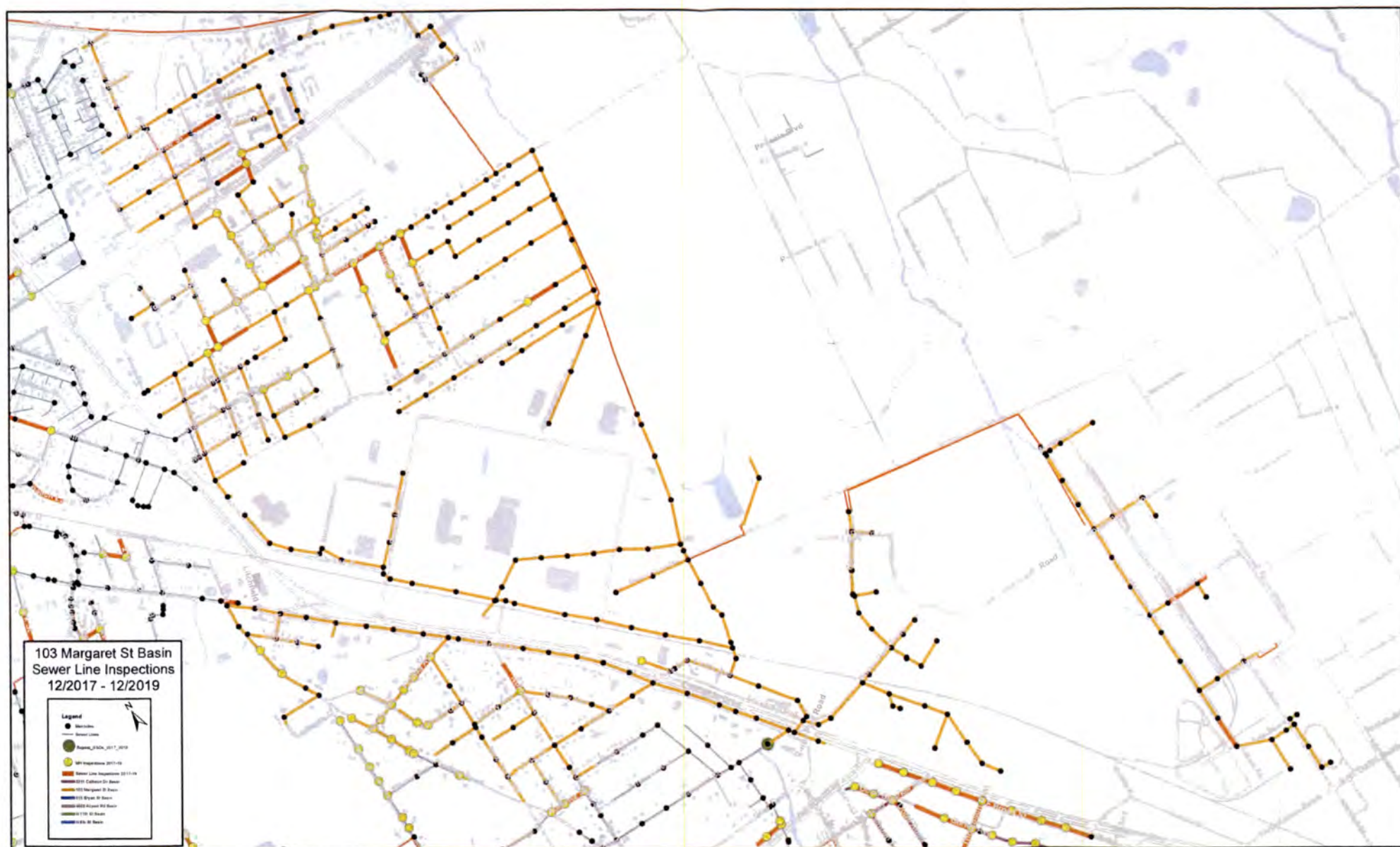




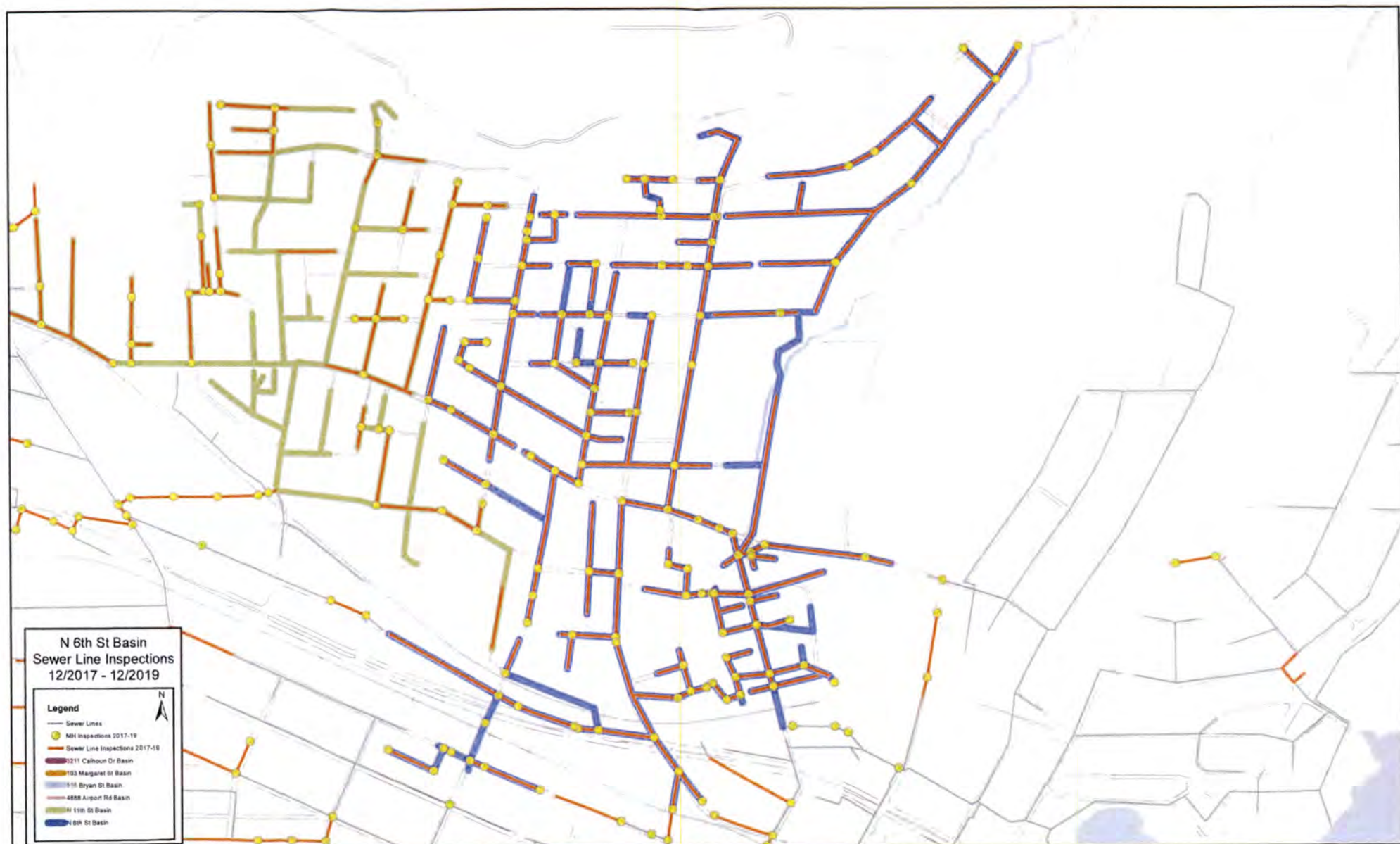












West River WWTP - SSOs December 2017 - December 2019

SSO Address	SSO Occurrence Date(s)	Comments
400, 404, 406 North 6th Street	12/20/2017; 2/7/2018; 2/11/2018; 12/1/2018; 12/8/2018; 12/28/2018; 1/4/2019; 1/19/2019; 1/23/2019; 2/17/2019; 2/19/2019;	1st MH lid was bolted down, but overflow moved up the line to the previous MH. Rerouted a line with several creek crossing to reduce infiltration in this basin. Also, cut and capped laterals from demolished houses.
400, 401, 402, 404 408 North 11th Street	12/20/2017; 2/7/2018; 2/11/2018; 1/4/2019; 1/19/2019; 1/23/2019; 2/17/2019; 2/19/2019; 10/25/2019; 12/22/2019	In a creek crossing. (concrete drainage ditch) Has a lid for bolts, but is not bolted down.
515 Bryan Street Pump Station	2/11/2018; 12/23/2019	These pumps should be checked to ensure they are operating at peak efficiency. Possibly just overwhelmed by infiltration.
1323, 1324, 1329 Jackson Avenue	9/27/2018; 12/28/2018; 2/21/2019; 2/22/2019	MH lid was bolted down. This has prevented additional overflows at this location.
23, 93 River Road	11/12/2018	MH is raised.
AL-759 E	12/28/2018	MH was raised. No additional overflows at this location since raising MH.
28 Cabot Avenue	1/24/2019	Line was cleared and MH/access chamber installed for future cleaning and maintenance.
4688 Airport Road	2/19/2019; 2/21/2019; 12/23/2019	This pump station is being evaluated for overhaul.
419 Roslyn Drive	10/25/2019	Line was clogged by grease. Line should be added to preventative maintenance and inspection list.



1884 Rainbow Drive	12/23/2019	Overflow was caused by MH lid being removed while chamber was full. No overflow was present prior to MH lid being removed to check for blockage.
301 North 6th Place	10/25/2019; 12/22/2019	Same as N 6th St.
199 Silvey St., RBC	2/8/2018	Blockage. Cleared, inspected, cleaned
905 Brookside Drive	2/13/2018	Blockage. Cleared, inspected, cleaned
1282 Rainbow Drive	2/16/2018	Grease blockage. Cleared, inspected, cleaned
702 Tarrant Court	5/2/2018	Grease & debris blockage. Cleared, inspected, cleaned
4689 Airport Road	5/16/2018	Power failure to backup pump
2312 Sansom Avenue	6/19/2018	Grease blockage. Cleared, inspected, cleaned
597 Van dell Blvd.	6/28/2018	Power failure at Walnut Street Pump Station
3800 Roselawn Drive	7/4/2018	Pumps Tripped. Reset, cleaned
2200 Industrial Avenue	8/8/2018	Pipe joint leak. Repaired, cleaned
2476 Chestnut Street	12/29/2018	Blockage. Cleared, inspected, cleaned



Morningview Drive	5/31/2019	Grease blockage. Cleared, inspected, cleaned
912 Willow Street	12/4/2019	Grease & debris blockage. Cleared, inspected, cleaned

**SSO ADDRESS: 400, 404, 406 North 6th Street & 301 North 6th Place**

**MANHOLE NO: MH 32, MH 838**

**INVESTIGATION PERIOD: December 2017 - December 2019**

**ITEM #1 - Basin Investigation**

**Project Description: The GWWSB Sewer Crew conducted cleaning & CCTV inspections of the North 6th Street Basin to identify sewer main defects & I/I from February 2018 to October 2018.**

Description	Quantity	Unit	Unit Rate	Total	Comments
CCTV Cleaning & Inspection		LF	\$0.00	\$0.00	*See GIS & Sewer Crew for quantities
Point Repairs		EA	\$0.00	\$0.00	*See Sewer Crew for quantities
Total Cost				<b>\$0.00</b>	

*\* A cost breakdown for GWWSB CCTV and point repairs is required to determine to the actual GWWSB unit rate cost based on time and equipment*

**ITEM #2 - North 7th St S.S. Relocation**

**Project Description: The project included relocating approximately 804 linear feet of 8" sanitary sewer main that extended along Town Creek. The relocation project required abandoning approximately 911 linear feet of 8" vitrified clay sewer mains and 2 manholes. The sewer main crossed Town Creek at three locations and a CCTV inspection of the existing mains identified excessing inflow at each crossings. The project was performed from January 2019 thru August 2019.**

	Quantity	Unit	Unit Rate	Total	Comments
Engineering Design Services	1	LS	\$5,194.69	\$5,194.69	JBWT engineering fee
Materials (pipe, manholes, etc)	1	LS	\$38,163.18	\$38,163.18	*See Accounting for material breakdown cost
GWWSB Labor	1	LS	\$62,899.08	\$62,899.08	*See Accounting for total manhours & hourly rate
PreCCTV Inspection & Cleaning	911	LF	\$0.00	\$0.00	
PostCCTV Inspection & Cleaning	804	LF	\$0.00	\$0.00	
Total Cost				<b>\$106,256.95</b>	

*\* A cost breakdown for GWWSB CCTV is required to determine to the actual GWWSB unit rate cost based on time and equipment*

**ITEM #3 - North 6th Street Basin Sewer Rehab**

**Project Description:** The project included rehabilitating approximately 576 linear feet of sewer main on Avenue D and Brookside Drive. These mains were considered priority upon completion of CCTV inspections that identified severe infiltration. The work was completed by Horseshoe Construction from June 2018 thru August 2018.

	Quantity	Unit	Unit Rate	Total	Comments
PreCCTV Inspection & Cleaning	576	LF	\$0.00	\$0.00	
PostCCTV Inspection & Cleaning	576	LF	\$0.00	\$0.00	
8" Pipe Bursting	576	LF	\$42.10	\$24,249.60	
Sewer Service Reconnection	4	EA	\$935.00	\$3,740.00	
4" Sewer Lateral Replacement	50	LF	\$38.00	\$1,900.00	
			<b>Total Cost</b>	<b>\$29,889.60</b>	

\* A cost breakdown for GWWSB CCTV inspection is required to determine the actual GWWSB unit rate cost based on time and equipment.



**SSO ADDRESS: 400, 401, 402, 404, 408 North 11th Street**

**MANHOLE NO: MH 838, MH 862**

**INVESTIGATION PERIOD: December 2017 - December 2019**

**ITEM #1 - MH 838 Abandonment**

**Project Description: The GWWSB construction crews abandoned MH 838 and repaired a pipe line sag to eliminate the SSO.**

Description	Quantity	Unit	Unit Rate	Total	Comments
CCTV Cleaning & Inspection	267	LF	\$0.00	\$0.00	
Point Repairs	1	EA	\$0.00	\$0.00	
Total Cost				<b>\$0.00</b>	

*\* A cost breakdown for CCTV inspection and point repair is required to determine to the actual GWWSB unit rate cost based on time and equipment.*

**ITEM #2 - North 11th Street Basin Sewer Rehab**

**Project Description: The project included rehabilitating approximately 752 linear feet of sewer main on Avenue H. These mains were considered priority upon completion of CCTV inspections that identified severe infiltration. The work was completed by Horseshoe Construction from June 2018 thru August 2018.**

	Quantity	Unit	Unit Rate	Total	Comments
PreCCTV Inspection & Cleaning	752	LF	\$0.00	\$0.00	
PostCCTV Inspection & Cleaning	752	LF	\$0.00	\$0.00	
8" Pipe Bursting	752	LF	\$42.10	\$31,659.20	
Sewer Service Reconnection	10	EA	\$935.00	\$9,350.00	
4" Sewer Lateral Replacement	125	LF	\$38.00	\$4,750.00	
Total Cost				<b>\$45,759.20</b>	

*\* A cost breakdown for GWWSB CCTV inspection is required to determine to the actual GWWSB unit rate cost based on time and equipment.*

**SSO ADDRESS: 1323, 1324, 1329 Jackson Ave**

**MANHOLE NO: MH 4595**

**INVESTIGATION PERIOD: December 2017 - December 2019**

**ITEM #1 - Owens St Basin Sewer Rehab**

**Project Description:** The project included rehabilitating approximately 2,900 linear feet of 8" sewer mains to eliminate infiltration and reduce the effects of surcharging in the basin. The work was completed by TrenTay Inc. from January 2018 to July 2018.

	Quantity	Unit	Unit Rate	Total	Comments
Engineering Design Services	1	LS	\$16,092.34	\$16,092.34	JBWT engineering fee
8" Pipe Bursting	2908	LF	\$55.00	\$159,940.00	
Precast Manhole Replacement	1	EA	\$4,500.00	\$4,500.00	
Sewer Service Reconnection	14	EA	\$3,000.00	\$42,000.00	
4" Sewer Lateral Replacement	142	LF	\$5.00	\$710.00	
PreCCTV Inspection & Cleaning	2908	LF	\$0.00	\$0.00	*PreCCTV conducted by GWWSB
PostCCTV Inspection & Cleaning	2908	LF	\$3.00	\$8,724.00	
			<b>Total Cost</b>	<b>\$231,966.34</b>	

*\* A cost breakdown for GWWSB CCTV is required to determine the actual GWWSB unit rate cost based on time and equipment*

**ITEM #2 - Owens St Basin Outfall - Sewer Flow Monitoring**

**Project Description:** The project included conducting a sewer flow monitoring test program to evaluate the capacity of basin and inflow during times of heavy rain events. The sewer flow monitoring was conducted by CSL, Inc. in April 2019.

	Quantity	Unit	Unit Rate	Total	Comments
CSL, Inc. Consulting Fees	1	LS	\$0.00	\$0.00	*See Accounting for consulting fee.
			<b>Total Cost</b>	<b>\$0.00</b>	

**ITEM #3 - Owens St Lift Station Improvements**

**Project Description: The GWWSB Maintenance department repaired/replaced the pump(s) and motor(s) at the existing lift station to increase the pumping capacity at the lift station. The work was performed between June 2019 to August 2019.**

Description	Quantity	Unit	Unit Rate	Total	Comments
Pump/Motor Rebuild	1	LS	\$0.00	\$0.00	*See GIS & Sewer Crew for quantities
GWWSB Labor	1	LS	\$0.00	\$0.00	*See Accounting for total manhours and actual cost
Total Cost				<b>\$0.00</b>	

*\* A cost breakdown for GWWSB CCTV and point repairs is required to determine to the actual GWWSB unit rate cost based on time and equipment*



## Sewer Line Inspections 2017 - 2019

Notes	Street	Project_Nc Plat_No	US MH	DS MH	Size (in)	Const Date	Slope	Length	Score	Material	Owner	Rehab Date	Rehab Type	Receiving Lift Station	Inspection Date	Roots	Infiltration
	Commerce		183	173	8	1979	0	421.2		PVC	GWWSB			Brooke Ave	3/21/2018 0:00		
	Commerce		189	183	8	1979	0	170.4		PVC	GWWSB			Brooke Ave	3/21/2018 0:00		
			249	250	10		0	360.6		1 PVC	GWWSB			159/Hwy77	8/23/2018 0:00	No	No
			291	289	10		0	263.5		1 DIP	GWWSB			159/Hwy77	8/23/2018 0:00		
	Crown Pt		0	421	6		0	220.0		3 VCP	GWWSB			S 6th St	2/4/2019 0:00		
	Moragne A	562	1255	12	18		0	416.9		2 Concrete	GWWSB			S 6th St	7/10/2018 0:00		
	Randall St		51	440	6	1923	0	184.0		5 VCP	GWWSB			S 6th St	11/21/2019 0:00	Yes	No
Hole in Pip	S 12th St		0	51	6		0	430.5		4 VCP	GWWSB			S 6th St	11/20/2019 0:00	No	No
Blocked 1/	S 12th St		0	442	6		0	223.2		3 VCP	GWWSB			S 6th St	1/15/2020 0:00	No	Yes
	Peachtree		488	487	6	1924	0	134.0		4 VCP	GWWSB			S 6th St	11/6/2018 0:00		
	Foster Ave		493	57	8	1915	0	382.4		4 VCP	GWWSB			S 6th St	9/10/2019 0:00	Yes	No
PVC first 1:	Holly St		0	493	6	1915	0	400.4		VCP				S 6th St	5/7/2018 0:00		
ABS	S 16th St		64	501	6	1915	0	180.5		3 VCP	GWWSB			S 6th St	7/18/2018 0:00		
	Chestnut S		7049	6019	8	2017	0	364.8		5 HDPE	GWWSB			S 6th St	9/3/2019 0:00	No	No
	Cansler Ave		0	506	6	1915	0	450.0		2 VCP	GWWSB			S 6th St	9/10/2019 0:00	No	No
	Hill Ave		507	508	6	1915	0	450.2		4 VCP	GWWSB			S 6th St	5/21/2019 0:00	Yes	No
Root Bound	3rd Ave		0	69	6	1915	0	490.5		3 VCP	GWWSB			S 6th St	7/17/2018 0:00	Yes	
	S 11th St		7062	69	8	2017	0	248.1		2 HDPE	GWWSB			S 6th St	7/17/2018 0:00	No	No
			0	27	6		0	225.0		5 VCP	GWWSB			S 6th St	2/13/2019 0:00		
	Moragne A		521	522	18		0	231.7		2 Concrete	GWWSB			S 6th St	8/27/2018 0:00		
	S 5th St		524	4	8	1911	0	488.5		VCP	GWWSB			S 6th St	3/1/2018 0:00		
Located by Turrentine			5435	5391	8	1907	0	374.5		4 VCP	GWWSB			S 6th St	9/14/2018 0:00	No	No
Located by Turrentine			0	556	8	1907	0	520.7		VCP	GWWSB			S 6th St	3/28/2018 0:00		
	S 3rd St		0	6022	6	1916	0	308.6		3 VCP	GWWSB			S 6th St	6/3/2019 0:00	No	No
	Chestnut S		90	576	8	2018	0	286.0		2 HDPE	GWWSB	6/1/2018 0:00		S 6th St	7/11/2018 0:00		
	Chestnut S		576	655	8	2018	0	338.7		1 HDPE	GWWSB	6/1/2018 0:00		S 6th St	6/14/2018 0:00		
	Walnut St		3	87	8	3/18/2014	0	297.5		5 VCP	GWWSB			S 6th St	3/1/2018 0:00	No	No
	Berea Ave		0	583	6	1924	0	220.2		5 VCP	GWWSB			S 6th St	12/11/2018 0:00		
			592	593	8	2017	0	347.9		1 HDPE	GWWSB			S 6th St	2/22/2018 0:00	No	No
			596	597	6	1924	0	97.1		4 VCP	GWWSB			S 6th St	11/6/2018 0:00		
			597	487	6		0	108.5		4 VCP	GWWSB			S 6th St	11/6/2018 0:00		
GCU			510	607	8	2017	0	183.1		3 HDPE	GWWSB			S 6th St	11/20/2019 0:00	No	No
Underwater			607	606	8	2017	0	240.2		3 HDPE	GWWSB			S 6th St	11/20/2019 0:00	No	No
			606	608	8	2017	0	238.7		3 HDPE	GWWSB			S 6th St	11/20/2019 0:00	No	No
	S 10th St		72	608	8	1907	0	181.8		2 CIPP	GWWSB		Slip Line	S 6th St	8/21/2018 0:00		
	S 10th St		608	73	8	1907	0	187.2		2 CIPP	GWWSB		Slip Line	S 6th St	8/21/2018 0:00	No	No
	Forrest Ave		6003	613	8	1915	0	667.9		4 VCP	GWWSB			S 6th St	3/21/2018 0:00	No	No
Contractor			630	631	8	10/8/2014	0	185.7		1 HDPE	GWWSB			S 6th St	8/14/2018 0:00	No	No
	Alabama St		632	633	8	1916	0	370.9		5 VCP	GWWSB			S 6th St	4/15/2019 0:00	Yes	Yes
Line is plug	Forrest Ave		640	639	3		0	301.4		4 VCP	GWWSB			S 6th St	3/27/2019 0:00		
			0	0	10		0	97.5		1 HDPE	GWWSB			S 6th St	3/7/2019 0:00		
			645	643	8		0	313.3		1 HDPE	GWWSB		Slip Line	S 6th St	3/8/2019 0:00		
			644	645	8		0	317.5		1 HDPE	GWWSB			S 6th St	3/8/2019 0:00		
			841	644	8		0	288.8		1 HDPE	GWWSB		Slip Line	S 6th St	3/11/2019 0:00		
	N 12th St		4532	647	10	1915	0	96.6		4 VCP	GWWSB			S 6th St	3/7/2019 0:00		Yes
12" CI Slip	N 12th St		646	647	10		0	78.9		4 HDPE	GWWSB		Slip Line	S 6th St	3/7/2019 0:00		
	1st Ave		649	21	8	2017	0	498.0		1 CIPP	GWWSB			S 6th St	3/16/2018 0:00	No	No
SAGS IN LIF	Chestnut S		654	652	8	2018	0	275.1		2 HDPE	GWWSB	6/1/2018 0:00		S 6th St	7/12/2018 0:00		
			7086	71	8	2017	0	553.7		2 HDPE	GWWSB			S 6th St	4/18/2019 0:00	No	No
	Alabama St		0	657	8	1916	0	200.1		3 VCP	GWWSB			S 6th St	6/12/2019 0:00	No	No
ABS	Gardner St		31	663	6	1915	0	274.5		4 VCP	GWWSB			S 6th St	7/12/2018 0:00		
	Meighan B		4533	910	15		0	246.8		3 RCP	GWWSB			S 6th St	3/14/2019 0:00		

ABS	S 5th St		5461	568	8	2017	0	321.2	1 CIPP	GWWSB		S 6th St	3/16/2018 0:00	No	No
GCU	S 5th St		567	568	8	2/17/2014	0	137.4	1 CIPP	GWWSB		S 6th St	2/22/2018 0:00	No	No
	S 6th St		6	674	12		0	225.0	4 VCP	GWWSB		S 6th St	5/10/2018 0:00	No	No
	S 3rd St		678	677	8		0	198.8	1 CIPP	GWWSB		S 6th St	3/16/2018 0:00	No	No
San. Sewer			520	693	30	2/22/2009	0.242	582.4	1 CIPP	GWWSB	2/22/2009 0:00 CIPP	S 6th St	2/22/2019 0:00	No	No
	Line St		747	746	6	1924	0	271.8	4 VCP	GWWSB		S 6th St	5/7/2019 0:00	Yes	Yes
Checked O	Line St		0	747	6		0	475.1	3 VCP	GWWSB		S 6th St	5/7/2019 0:00		
	Tyler St		0	748	6	1924	0	297.1	VCP	GWWSB		S 6th St	3/6/2018 0:00		
	Tyler St		748	745	6		0	400.2	3 VCP	GWWSB		S 6th St	5/7/2019 0:00	No	No
CNL US Mt	9-P54	891	5367	749	8	1978	0	150.1	2 PVC	GWWSB		S 6th St	5/23/2019 0:00	No	No
	Plainview S		750	8025	6	1924	0	300.1	3 VCP	GWWSB		S 6th St	5/23/2019 0:00	No	No
	Plainview S		0	750	6		0	140.5	3 Concrete	GWWSB		S 6th St	5/8/2019 0:00	No	No
Checked O	Hillier St		757	756	6		0	372.6	3 VCP	GWWSB		S 6th St	5/29/2019 0:00	No	No
	Sequoyah ,		762	761	6	1924	0	199.2	VCP	GWWSB		S 6th St	6/6/2018 0:00		
ABS	Sequoyah ,		763	761	6		0	150.6	VCP	GWWSB		S 6th St	6/6/2018 0:00		
ABS	Wawonah		761	764	6	1924	0	403.1	4 VCP	GWWSB		S 6th St	6/6/2018 0:00	No	Yes
	Varies from Ave D		767	765	6		0	200.5	VCP	GWWSB		S 6th St	4/24/2018 0:00		
JC,Varies fr	Ave D		766	767	6		0	129.6	VCP	GWWSB		S 6th St	4/24/2018 0:00		
	Ave D		0	736	6		0	151.1	VCP	GWWSB		S 6th St	5/15/2018 0:00		
	N 10th St		737	736	8		0	94.4	VCP	GWWSB		S 6th St	5/11/2018 0:00		
	N 10th St		736	768	8	1924	0	517.5	VCP	GWWSB		S 6th St	5/11/2018 0:00		
Intruding t	Henry St		771	810	8		0	345.4	4 VCP	GWWSB		S 6th St	4/16/2018 0:00	No	Yes
Checked O	N 9th St		5323	772	6		0	327.2	VCP	GWWSB		S 6th St	4/19/2018 0:00		
JC	Ave E		774	775	6		0	185.4	VCP	GWWSB		S 6th St	4/18/2018 0:00		
	Ave E		775	730	6		0	148.4	VCP	GWWSB		S 6th St	4/19/2018 0:00		
	N 8th St		731	730	6		0	173.0	3 VCP	GWWSB		S 6th St	10/12/2018 0:00		
	5		0	731	6	Nov-54	0	241.2	Concrete	GWWSB		S 6th St	10/11/2018 0:00		
JC	N 8th St		732	731	6		0	183.6	VCP	GWWSB		S 6th St	4/5/2018 0:00		
JC	Ave F		734	733	6		0	374.8	VCP	GWWSB		S 6th St	4/18/2018 0:00		
			733	732	6		0	22.1	3 VCP	GWWSB		S 6th St	11/15/2018 0:00		
Intruding S	N 8th St		776	733	6	Sep-51	0	265.1	3 VCP	GWWSB		S 6th St	10/9/2018 0:00		
Varies From	Crest Ave		0	776	6	Sep-51	0	149.6	4 VCP	GWWSB		S 6th St	10/4/2018 0:00		
INTRUDING	Crestview I		777	778	6		0	352.5	VCP	GWWSB		S 6th St	3/20/2018 0:00		
ABS	Crestview I		0	777	6		0	150.3	VCP	GWWSB		S 6th St	3/19/2018 0:00		
	N 8th St		730	769	6		0	355.0	VCP	GWWSB		S 6th St	4/12/2018 0:00		
JC	N 8th St		769	770	6		0	356.2	VCP	GWWSB		S 6th St	4/13/2018 0:00		
	Rogers St		765	773	6		0	350.2	VCP	GWWSB		S 6th St	4/30/2018 0:00		
JC	Ave D		0	765	6		0	147.2	VCP	GWWSB		S 6th St	4/24/2018 0:00		
Checked O	N 10th St		782	783	6		0	101.7	VCP	GWWSB		S 6th St	5/2/2018 0:00		
	N 10th St		783	781	6		0	60.7	VCP	GWWSB		S 6th St	5/2/2018 0:00		
	N 10th St		781	780	6		0	187.2	VCP	GWWSB		S 6th St	5/3/2018 0:00		
	N 10th St		780	737	8	Jun-85	0	254.0	PVC	GWWSB	6/1/1985 0:00 Replaced	S 6th St	5/3/2018 0:00		
Checked O	N 10th St		0	782	6		0	150.2	VCP	GWWSB		S 6th St	5/2/2018 0:00		
Checked O			784	785	6	Dec-52	0	177.1	4 Concrete	GWWSB		S 6th St	10/12/2018 0:00		
Checked O			785	781	6	Dec-52	0	199.9	Concrete	GWWSB		S 6th St	5/3/2018 0:00		
Checked Old Book			787	786	6		0	334.1	3 VCP	GWWSB		S 6th St	3/9/2018 0:00	Yes	Yes
	Brookside I		788	789	6		0	126.7	VCP	GWWSB		S 6th St	4/4/2018 0:00		
	Brookside I		786	789	8		0	379.0	VCP	GWWSB		S 6th St	4/3/2018 0:00		
			790	2358	8		0	317.3	VCP	GWWSB		S 6th St	7/25/2018 0:00		
			791	790	8		0	183.2	VCP	GWWSB		S 6th St	3/2/2018 0:00		Yes
PVC/VCP	N 10th St		797	768	8	1924	0	167.5	VCP	GWWSB		S 6th St	6/7/2018 0:00		
	9 AV-A(3)	1131	801	800	8	1982	0	155.3	PVC	GWWSB		S 6th St	6/1/2018 0:00		
	9 AV-A(3)	1131	800	799	8	1982	0	136.3	PVC	GWWSB		S 6th St	6/1/2018 0:00		
	Ave A	9 AV-A(3)	1131	799	798	8	1982	0	94.7	PVC	GWWSB	S 6th St	6/1/2018 0:00		



ABS	Ave A	798	768	6	1924	0	256.2	VCP	GWWSB	S 6th St	6/1/2018 0:00	
	Ave A	768	802	10	1924	0	361.3	3 VCP	GWWSB	S 6th St	6/13/2018 0:00	
	N 9th St	802	803	10	1924	0	202.1	2 VCP	GWWSB	S 6th St	6/13/2018 0:00	
SAG UNDE		803	804	10		0	325.7	3 VCP	GWWSB	S 6th St	6/22/2018 0:00	
JC	Henry St	805	804	8		0	376.2	VCP	GWWSB	S 6th St	4/17/2018 0:00	
	Ave B	806	807	8		0	271.2	PVC	GWWSB	S 6th St	5/1/2018 0:00	
ABS	N 9th St	807	802	8	1924	0	168.9	2 VCP	GWWSB	S 6th St	5/1/2018 0:00	
Line Block	N 9th St	772	808	8		0	186.1	VCP	GWWSB	S 6th St	4/20/2018 0:00	
		773	808	6	2006	0	335.7	HDPE	GWWSB	6/1/2006 0:00 Pipe Burst	5/1/2018 0:00	
JC	N 9th St	808	807	8	1924	0	173.4	VCP	GWWSB	S 6th St	4/20/2018 0:00	
	Ave C	5055	772	6		0	241.4	VCP	GWWSB	S 6th St	5/1/2018 0:00	
Intruding S	Henry St	810	805	6		0	347.0	3 VCP	GWWSB	S 6th St	11/13/2018 0:00	
JC	N 8th St	770	811	8	1929	0	347.0	VCP	GWWSB	S 6th St	4/13/2018 0:00	
		804	796	10	1924	0	334.7	3 VCP	GWWSB	S 6th St	7/16/2018 0:00	Yes
JC	N 8th St	811	796	8	1929	0	374.7	4 VCP	GWWSB	S 6th St	4/13/2018 0:00	No
	Ave A	0	796	6		0	250.8	3 VCP	GWWSB	S 6th St	10/11/2018 0:00	
	Tuscaloosa	812	813	8	1924	0	332.7	2 VCP	GWWSB	S 6th St	7/19/2018 0:00	
2/1/1985	Henry St	814	812	8	2017	0	515.9	1 HDPE	GWWSB	S 6th St	7/19/2018 0:00	No
	Ave H	815	816	8	2018	0	288.1	1 HDPE	GWWSB	6/1/2018 0:00	7/12/2018 0:00	No
	Ave H	816	298	8	2018	0	235.9	1 HDPE	GWWSB	6/1/2018 0:00	7/13/2018 0:00	Yes
Breaks/Roc	Keeling St	298	817	8	2018	0	231.5	1 HDPE	GWWSB	6/1/2018 0:00	7/13/2018 0:00	No
Concrete &	Ave G	818	819	6	1924	0	342.7	4 Concrete	GWWSB	S 6th St	8/17/2018 0:00	No
	Tuscaloosa	0	797	6	1924	0	163.1	1 VCP	GWWSB	S 6th St	6/7/2018 0:00	
	Tuscaloosa	821	797	8	1924	0	348.3	VCP	GWWSB	S 6th St	6/7/2018 0:00	
	Tuscaloosa	822	821	8	1924	0	179.2	VCP	GWWSB	S 6th St	6/7/2018 0:00	
ABS	Evans St	0	822	6	1924	0	525.2	VCP	GWWSB	S 6th St	6/6/2018 0:00	
	Tuscaloosa	0	823	8		0	50.1	VCP	GWWSB	S 6th St	6/6/2018 0:00	
JC	Ave C	0	773	6	1924	0	160.2	VCP	GWWSB	S 6th St	4/30/2018 0:00	
Major infill	Tuscaloosa	764	825	8		0	281.5	5 VCP	GWWSB	S 6th St	6/29/2018 0:00	No
		838	4534	10	2016	0	56.3	2 HDPE	GWWSB	6/1/2016 0:00 Open Cut	3/8/2019 0:00	Yes
		0	0	10		0	73.8	5 VCP	GWWSB	S 6th St	3/8/2019 0:00	
3/1/1989	Milton St	842	843	6	3/1/1989	0	140.1	2 VCP	GWWSB	S 6th St	7/18/2018 0:00	Yes
2/1/1973	Milton St	843	844	6	2/1/1973	0	187.4	3 VCP	GWWSB	S 6th St	7/19/2018 0:00	Yes
2/1/1973	Harvey St	0	844	6	2/1/1973	0	298.0	3 VCP	GWWSB	S 6th St	7/19/2018 0:00	
	Pipeshop A	0	850	6	1924	0	451.8	VCP	GWWSB	S 6th St	3/20/2018 0:00	
	Meighan B	35	854	6		0	109.3	2 VCP	GWWSB	S 6th St	9/21/2018 0:00	
	Meighan B	856	855	6		0	30.6	3 DIP	GWWSB	S 6th St	10/1/2018 0:00	
	Meighan B	854	856	6		0	312.4	2 VCP	GWWSB	S 6th St	9/21/2018 0:00	
2/1/1993	Meighan B	855	851	8	2/1/1993	0	147.1	3 VCP	GWWSB	S 6th St	10/1/2018 0:00	
	Henry St	91	857	8	2017	0	296.9	1 HDPE	GWWSB	S 6th St	8/22/2018 0:00	No
	Meighan B	851	857	8		0	399.8	3 VCP	GWWSB	S 6th St	9/21/2018 0:00	
2/1/1986	Henry St	857	858	10	2017	0	345.0	1 CIPP	GWWSB	S 6th St	3/22/2018 0:00	
INSPECTIO		858	848	10	2006	0	328.1	2 HDPE	GWWSB	6/1/2006 0:00 Pipe Burst	2/13/2018 0:00	
	Tarrant Ct	847	859	6		0	190.1	4 VCP	GWWSB	S 6th St	9/25/2018 0:00	Yes
		848	859	10	2006	0	103.5	2 CIPP	GWWSB	6/1/2006 0:00 Replaced	9/25/2018 0:00	
		861	860	10		0	55.4	2 DIP	GWWSB	S 6th St	10/23/2018 0:00	
		859	861	10		0	116.5	2 VCP	GWWSB	S 6th St	10/23/2018 0:00	
	N 6th St	862	32	12		0	92.8	4 VCP	GWWSB	S 6th St	11/2/2018 0:00	
	N 6th St	865	864	12		0	170.6	2 VCP	GWWSB	S 6th St	8/3/2018 0:00	
	N 6th St	866	865	12	1924	0	281.7	3 VCP	GWWSB	S 6th St	7/27/2018 0:00	
	N 6th St	870	866	10		0	160.0	VCP	GWWSB	S 6th St	7/25/2018 0:00	Yes
Mike Carte	Tuscaloosa	813	868	10	1989	0	232.0	3 CIPP	GWWSB	CIPP	7/16/2018 0:00	No
Mike Carte	Tuscaloosa	868	869	10	1989	0	160.1	HDPE	GWWSB	CIPP	7/23/2018 0:00	Yes
Might Havi	Tuscaloosa	869	870	10	1989	0	101.3	HDPE	GWWSB	S 6th St	7/23/2018 0:00	



	Riley St	0	845	6	1924	0	480.0	3 VCP	GWWSB	S 6th St	7/17/2018 0:00		
	N 9th St	803	871	6	1924	0	137.8	2 VCP	GWWSB	S 6th St	6/13/2018 0:00		
	Tuscaloosa	872	871	8		0	187.1	3 VCP	GWWSB	S 6th St	8/31/2018 0:00		
	Tuscaloosa	5324	872	6	1924	0	200.1	3 HDPE	GWWSB	S 6th St	8/31/2018 0:00		
GAS LINE II Ave A		0	802	6		0	249.8	4 VCP	GWWSB	S 6th St	6/18/2018 0:00		
	Tuscaloosa	873	874	8	1924	0	415.4	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No
	Tuscaloosa	874	875	8	2017	0	121.2	1 CIPP	GWWSB	S 6th St	2/22/2018 0:00	No	No
	Tuscaloosa	5394	887	8	2017	0	341.8	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No
	Tuscaloosa	7073	887	8	2017	0	166.3	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No
	Line St	0	889	8		0	100.6	3 VCP	GWWSB	S 6th St	4/29/2019 0:00		
	Line St	889	888	6		0	99.5	4 VCP	GWWSB	S 6th St	4/25/2019 0:00		
	Wells Ave	888	885	6		0	196.5	4 VCP	GWWSB	S 6th St	12/17/2018 0:00		
	Intruding S Wells Ave	885	890	6		0	325.8	3 VCP	GWWSB	S 6th St	12/17/2018 0:00		
	Noccalula I	0	890	6		0	540.2	3 VCP	GWWSB	S 6th St	12/6/2018 0:00		
	Tuscaloosa	0	746	6		0	260.1	3 VCP	GWWSB	S 6th St	5/7/2019 0:00	No	No
Broken Pip		894	893	6	1915	0	371.6	1 VCP	GWWSB	S 6th St	10/23/2019 0:00	No	No
	Gardner St	896	898	6		0	195.0	3 VCP	GWWSB	S 6th St	11/21/2018 0:00		
	Alabama A	892	903	8	1915	0	424.5	3 VCP	GWWSB	S 6th St	10/24/2019 0:00	No	No
	N 13th St	893	892	8	1916	0	174.2	3 VCP	GWWSB	S 6th St	10/23/2019 0:00	No	No
	Intruding S N 13th St	904	892	8	1915	0	165.9	3 VCP	GWWSB	S 6th St	10/23/2019 0:00	No	No
	4" VCP M: N 13th St	0	904	4		0	277.2	1 UNK	GWWSB	S 6th St	10/24/2019 0:00	No	No
		0	904	8	1916	0	200.1	3 VCP	GWWSB	S 6th St	10/24/2019 0:00	No	No
	N Franklin	910	911	18		0	148.3	3 RCP	GWWSB	S 6th St	3/14/2019 0:00		
MINOR INF		911	907	18		0	533.0	3 RCP	GWWSB	S 6th St	3/14/2019 0:00	Yes	
	Gardner St	895	896	6	1924	0	449.8	3 VCP	GWWSB	S 6th St	11/21/2018 0:00		
	N 15th St	918	919	6		0	110.1	4 VCP	GWWSB	S 6th St	10/24/2019 0:00	No	No
	Broken joir	0	918	6	1924	0	197.0	4 VCP	GWWSB	S 6th St	10/24/2019 0:00	No	No
	Hole in pip	0	918	6	1924	0	647.0	4 VCP	GWWSB	S 6th St	10/29/2019 0:00	Yes	No
	Penny St	921	738	6	1924	0	303.3	VCP	GWWSB	S 6th St	5/11/2018 0:00		
Concrete/\	Penny St	5322	921	6	1924	0	293.2	5 Concrete	GWWSB	S 6th St	5/11/2018 0:00	Yes	Yes
	Kyle St	740	7051	8	2017	0	369.9	1 HDPE	GWWSB	S 6th St	6/6/2018 0:00	No	No
	Kyle Al	7071	739	8	2017	0	155.6	1 HDPE	GWWSB	S 6th St	6/5/2018 0:00	No	No
	Kyle St	7069	823	6	2017	0	332.7	1 HDPE	GWWSB	S 6th St	2/21/2018 0:00	No	No
	ABS Ave F	922	740	6		0	248.3	VCP	GWWSB	S 6th St	6/5/2018 0:00		
	ABS	0	922	6		0	129.0	VCP	GWWSB	S 6th St	6/4/2018 0:00		
	Checked O Kyle St	7070	740	8	2017	0	163.0	1 HDPE	GWWSB	S 6th St	6/5/2018 0:00	No	No
	ABS Wawonah	923	758	6	1924	0	295.2	3 VCP	GWWSB	S 6th St	6/11/2018 0:00		
	ABS Valley Jo A	0	758	6		0	160.0	3 VCP	GWWSB	S 6th St	6/11/2018 0:00		
	Checked O	924	767	8	Aug-51	0	259.9	HDPE	GWWSB	S 6th St	4/23/2018 0:00		
	Ave E	0	774	6		0	345.0	VCP	GWWSB	S 6th St	4/18/2018 0:00		
	Service line N 9th St	0	766	6		0	298.7	VCP	GWWSB	S 6th St	4/19/2018 0:00		
	ABS, Check Ave E	0	924	6	Aug-51	0	197.4	VCP	GWWSB	S 6th St	5/1/2018 0:00		
		929	928	6		0	114.6	5 Concrete	GWWSB	S 6th St	10/9/2018 0:00	Yes	Yes
		927	926	6		0	70.0	5 Concrete	GWWSB	S 6th St	10/9/2018 0:00		
		926	734	6		0	41.6	5 Concrete	GWWSB	S 6th St	10/9/2018 0:00		
	Crest Ave	925	929	6		0	200.2	5 Concrete	GWWSB	S 6th St	10/5/2018 0:00		
	Impassable Crest Ave	930	929	6		0	128.6	Concrete	GWWSB	S 6th St	10/9/2018 0:00		Yes
	Ave F	0	735	6		0	338.1	VCP	GWWSB	S 6th St	3/20/2018 0:00		
	ABS, JC Ave F	735	734	6		0	259.6	VCP	GWWSB	S 6th St	4/18/2018 0:00		
	Intruding S Brookside I	779	788	6		0	477.6	3 VCP	GWWSB	S 6th St	11/20/2018 0:00		
	JC Sunnyvale	731	730	6		0	299.5	VCP	GWWSB	S 6th St	4/12/2018 0:00		
		945	944	8		0	153.5	Concrete	GWWSB	S 6th St	3/16/2018 0:00		
		975	1002	8		0	139.0	3 PVC	GWWSB	S 6th St	8/16/2019 0:00	No	No
		0	0	8		0	71.2	3 PVC	GWWSB	S 6th St	8/16/2019 0:00	No	No

S 11th St			1004	59	8	2017	0	307.5	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No
S 11th St			1005	1004	8	2017	0	292.3	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No
S 11th St			7053	7061	8	2017	0	314.5	4 HDPE	GWWSB	S 6th St	6/19/2019 0:00	No	No
Intruding S Morgan Dr			5072	1010	6		0	237.5	4 VCP	GWWSB	S 6th St	1/29/2019 0:00		
Located by Haralson A			5378	1011	6	1915	0	258.8	5 VCP	GWWSB	S 6th St	2/27/2019 0:00	Yes	Yes
Located by Argyle Cir	15997	1219	1028	540	8	6/30/2014	0	165.1	1 HDPE	GWWSB	6/26/2014 0:00 Pipe Burst	3/23/2018 0:00	No	No
2/1/1998 N 9th St			0	853	8	2/1/1998	0	263.1	2 VCP	GWWSB	S 6th St	8/29/2018 0:00		
Jones St			34	35	6	1924	0	156.8	3 VCP	GWWSB	S 6th St	9/21/2018 0:00		
WAC Need Gardner St			0	34	6	2/9/1994	0	886.5	4 VCP	GWWSB	S 6th St	11/2/2018 0:00	No	No
2/1/1988 Maple St			846	29	6	2/1/1988	0	309.6	3 VCP	GWWSB	S 6th St	9/24/2018 0:00	Yes	
Maple St			0	846	6		0	88.1	3 VCP	GWWSB	S 6th St	9/24/2018 0:00		
2/1/1988 Riley St			0	846	6	2/1/1988	0	242.9	VCP	GWWSB	S 6th St	9/24/2018 0:00		
2/1/1986 Henry St			7066	858	8	2/1/1986	0	386.9	1 HDPE	GWWSB	S 6th St	9/24/2018 0:00	No	No
Tarrant Ct			0	847	6		0	196.1	VCP	GWWSB	S 6th St	3/1/2018 0:00		
Tarrant Ct			0	847	6		0	111.2	VCP	GWWSB	S 6th St	3/1/2018 0:00		
2/1/1985 Henry St			29	814	8	2017	0	449.1	2 HDPE	GWWSB	S 6th St	7/19/2018 0:00	No	No
2/1/1988 Riley St			0	845	6	2/1/1988	0	300.0	2 VCP	GWWSB	S 6th St	7/18/2018 0:00	Yes	
2/1/1989 Harvey St			845	814	6	2/1/1989	0	209.6	2 VCP	GWWSB	S 6th St	7/17/2018 0:00		
Work done	GWWSB 1f	1096	1082	1083	8	2013	0	99.9	1 HDPE	GWWSB	6/1/2013 0:00 Pipe Burst	10/4/2018 0:00		
Work done	GWWSB 1f	1096	1083	817	8	2013	0	439.1	1 HDPE	GWWSB	6/1/2013 0:00 Pipe Burst	10/4/2018 0:00		
Meighan B			1094	668	16		0	108.4	2 DIP	GWWSB	S 6th St	3/14/2019 0:00		
			647	1094	10		0	399.0	5 VCP	GWWSB	S 6th St	3/11/2018 0:00		
Intruding s	Gadsden A		0	1100	6	1924	0	399.1	3 VCP	GWWSB	S 6th St	12/2/2019 0:00	No	No
N 16th St			1100	876	8	1924	0	194.8	3 VCP	GWWSB	S 6th St	12/2/2019 0:00	No	No
N 6th St			0	6006	10	1915	0	158.0	3 VCP	GWWSB	S 6th St	7/2/2019 0:00	No	No
Locust St			0	1143	8	1924	0	462.3	VCP	GWWSB	S 6th St	7/1/2019 0:00	No	No
Under buil			1152	1148	8	1914	0	291.7	5 VCP	GWWSB	S 6th St	12/26/2018 0:00	No	No
Henry St			7068	1142	8	2017	0	436.7	2 HDPE	GWWSB	S 6th St	7/2/2019 0:00	No	No
			1179	1141	6	1924	0	660.7	5 VCP	GWWSB	S 6th St	5/3/2018 0:00	Yes	No
S 4th St			1188	1187	10		0	153.5	4 VCP	GWWSB	S 6th St	11/20/2018 0:00		
Chestnut S			680	1187	18	1913	0	574.2	2 VCP	GWWSB	S 6th St	4/23/2019 0:00		
			5185	1190	8	1923	0	293.2	4 VCP	GWWSB	S 6th St	12/30/2019 0:00	No	No
		1168	8008	1197	8	1966	0	351.0	2 VCP	GWWSB	S 6th St	9/13/2018 0:00		
1st Ave			0	1196	6	1924	0	425.2	3 VCP	GWWSB	S 6th St	9/20/2018 0:00		
S 5th St			1204	680	8	1924	0	151.1	3 VCP	GWWSB	S 6th St	12/27/2018 0:00		
Meighan B			1210	1211	6		0	223.0	3 VCP	GWWSB	S 6th St	9/20/2018 0:00		
			0	0	8		0	84.3	Concrete	GWWSB	S 6th St	8/20/2018 0:00		Yes
			5183	1229	8	1923	0	105.2	PVC	GWWSB	S 6th St	6/6/2018 0:00		
			1229	1188	8	1923	0	155.5	VCP	GWWSB	S 6th St	6/5/2018 0:00		
S 5th St			7072	566	8	2017	0	557.7	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No
		1032	5460	1233	8	2017	0	32.3	1 CIPP	GWWSB	S 6th St	2/22/2018 0:00	No	No
S 1st St			1249	11	6	1924	0	488.6	3 VCP	GWWSB	S 6th St	6/6/2019 0:00	No	No
ABS / CIPP	S 5th St		5442	7	8	2017	0	407.3	1 CIPP	GWWSB	S 6th St	4/9/2018 0:00	No	No
S 5th St			1247	525	8	1907	0	505.4	VCP	GWWSB	S 6th St	3/8/2018 0:00		
S 1st St			0	0	6	1924	0	353.2	3 VCP	GWWSB	S 6th St	6/6/2019 0:00	No	No
S 4th St			5073	1256	6	1915	0	230.5	2 VCP	GWWSB	S 6th St	7/10/2018 0:00		
			28	1255	12		0	17.5	VCP	GWWSB	S 6th St	5/21/2018 0:00		
Moragne A			28	13	15		0	400.6	VCP	GWWSB	S 6th St	5/21/2018 0:00		
Chestnut S			5329	90	8	1907	0	553.7	2 VCP	GWWSB	S 6th St	6/15/2018 0:00		
VCP/CIP	N 7th St		5045	23	6	1912	0	224.1	2 VCP	GWWSB	S 6th St	6/20/2018 0:00		
INTRUDING	1st Ave		0	25	6	1913	0	497.4	4 VCP	GWWSB	S 6th St	6/26/2019 0:00	No	No
Forrest Ave			1285	1286	10	2008	0	466.4	3 HDPE		6/1/2008 0:00 Pipe Burst	10/19/2018 0:00		
Checked O	S 24th St		1301	359	8		0	212.0	2 VCP	GWWSB	S 6th St	4/12/2019 0:00	No	No
S Burns St			0	0	8		0	343.3	3 VCP	GWWSB	S 6th St	5/14/2019 0:00	Yes	No



7'2"	Winona Av	1344	1343	8	0	550.0	4 VCP	GWWSB	S 6th St	3/9/2018 0:00	No	No			
	Cabot Ave	1367	1341	6	0	399.8	3 VCP	GWWSB	S 6th St	8/12/2019 0:00	No	No			
	Loner Ave	1341	375	8	0	418.3	VCP	GWWSB	S 6th St	3/9/2018 0:00					
	Comnrock #	1369	1368	8	0	285.1	4 VCP	GWWSB	S 6th St	10/17/2018 0:00					
	Hinsdale A	0	1370	8	0	210.2	VCP	GWWSB	S 6th St	3/1/2018 0:00					
ENCRUSTA	Hinsdale A	1370	1359	8	0	342.0	VCP	GWWSB	S 6th St	3/1/2018 0:00					
	Dwight Av	1373	373	6	0	395.4	4 VCP	GWWSB	S 6th St	3/1/2019 0:00					
Incompletr	N 31st St	380	381	8	2/10/2014	0	359.8	2 VCP	GWWSB	S 6th St	9/5/2018 0:00	No	No		
	N 32nd St	1452	1441	8	0	531.6	VCP	GWWSB	S 6th St	3/1/2018 0:00					
	N 33rd St	1440	1443	6	0	631.9	VCP	GWWSB	S 6th St	5/2/2018 0:00					
	N 32nd St	1441	1442	8	0	520.8	VCP	GWWSB	S 6th St	3/1/2018 0:00					
Concrete &	Western A	0	1429	6	Mar-54	0	125.1	3 Concrete	GWWSB	S 6th St	6/20/2019 0:00	No	No		
Checked O	Western A	0	1439	6	Dec-54	0	193.1	4 VCP	GWWSB	S 6th St	6/20/2019 0:00	No	No		
INFILTRATI	Western A	1457	1458	8	1985	0	266.7	3 PVC	GWWSB	S 6th St	3/5/2019 0:00	No	Yes		
Checked O	Su4e Ave	348	349	8	0	304.4	3 VCP	GWWSB	Bryant St	9/27/2018 0:00					
VCP PER CC	Stonewall /	1493	1492	8	0	302.8	VCP	GWWSB	Bryant St	3/1/2018 0:00					
Checked O	Clark St	351	1504	8	0	327.4	3 VCP	GWWSB	Bryant St	4/24/2019 0:00	Yes				
Checked O	Bryan St	1505	1503	8	0	594.4	VCP	GWWSB	Bryant St	3/9/2018 0:00					
Checked O	Grady St	1508	1506	8	0	312.3	VCP	GWWSB	Bryant St	3/9/2018 0:00					
Checked O	Grady St	1506	1507	8	0	350.4	VCP	GWWSB	Bryant St	3/9/2018 0:00					
ABS	Henderson	1511	1510	8	0	351.5	4 VCP	GWWSB	Bryant St	3/12/2018 0:00	No	No			
Checked O	Henderson	1509	1511	8	0	289.4	VCP	GWWSB	Bryant St	3/12/2018 0:00					
Roots/Bro	Howard Pl	357	1527	8	3/12/2014	0	187.7	5 VCP	GWWSB	Bryant St	3/8/2018 0:00	Yes	No		
Checked O	Walnut St	1526	331	8	0	297.0	VCP	GWWSB	Bryant St	3/12/2018 0:00					
Checked O	Pearl St	1537	1493	8	0	458.4	VCP	GWWSB	Bryant St	3/1/2018 0:00					
Checked O	Henderson	1510	1530	8	0	351.5	4 VCP	GWWSB	Bryant St	3/12/2018 0:00	No	No			
Checked O	Grady St	1507	1531	8	0	350.4	VCP	GWWSB	Bryant St	3/9/2018 0:00					
Checked O	Walnut St	1531	1532	8	2006	0	301.9	CIPP	GWWSB	6/1/2006 0:00	CIPP	Bryant St	3/1/2018 0:00		
Checked O	Bryan St	1503	1541	15	0	406.8	VCP	GWWSB	Bryant St	3/1/2018 0:00					
Checked O	Wilson St	1545	1544	8	0	190.8	VCP	GWWSB	Bryant St	3/1/2018 0:00					
Checked O	Wilson St	1544	332	8	0	202.1	VCP	GWWSB	Bryant St	3/1/2018 0:00					
Checked O	Lincoln St	1546	1492	8	2006	0	400.7	CIPP	GWWSB	6/1/2006 0:00	CIPP	Bryant St	3/1/2018 0:00		
	Walnut St	1539	1538	8	0	124.9	VCP	GWWSB	Bryant St	3/1/2018 0:00					
Checked O	Walnut St	1538	1537	8	0	304.2	VCP	GWWSB	Bryant St	3/1/2018 0:00					
CRACKS &	Miller St	355	1533	8	0	470.1	4 VCP	GWWSB	Walnut St	3/15/2019 0:00		Yes			
Checked O	Georgia Av	1557	340	8	0	497.0	VCP	GWWSB	Bryant St	3/12/2018 0:00					
Checked O	Georgia Av	1562	1561	8	0	444.1	4 VCP	GWWSB	Bryant St	3/1/2018 0:00	No	No			
Checked O	Wilson St	1575	352	12	0	335.7	VCP	GWWSB	Bryant St	3/12/2018 0:00					
Missing sei	Ma4son Av	1582	1581	8	0	404.2	2 HDPE	GWWSB	6/1/2016 0:00	Pipe Burst	Bryant St	11/27/2018 0:00			
Checked O	Colbert Av	1618	1617	8	0	354.0	3 VCP		Hickory St	5/30/2019 0:00	Yes	No			
Checked O	Hickory St	1615	1616	15	0	59.7	2 VCP	GWWSB	Hickory St	10/2/2019 0:00	No	No			
	Hickory St	1613	1614	18	0	365.5	3 VCP	GWWSB	Hickory St	10/2/2019 0:00	No	No			
Varies fron	Truman St	389	388	10	0	340.6	Concrete	GWWSB	Owens St	3/1/2018 0:00					
Checked O	Roosevelt /	1666	1665	8	0	305.9	4 Concrete	GWWSB	Owens St	4/5/2019 0:00					
Checked O	Roosevelt /	1665	1638	8	0	355.0	Concrete	GWWSB	Owens St	3/12/2018 0:00					
	S 11th St	1668	1669	18	2017	0	170.1	1 CIPP	GWWSB	Owens St	2/22/2018 0:00	No	No		
Checked O	Harrison A	1674	1635	8	0	151.2	Concrete	GWWSB	Owens St	3/2/2018 0:00					
Line is coll;	McKinley #	1642	1677	8	0	387.6	5 Concrete	GWWSB	Owens St	8/28/2018 0:00	Yes	Yes			
Varies Fror	S 11th St	1671	1668	8	2017	0	561.5	1 HDPE	GWWSB	Owens St	2/22/2018 0:00	No	No		
	S 11th St	1694	1696	8	2017	0	198.6	1 HDPE	GWWSB	Owens St	2/22/2018 0:00	No	No		
	S 11th St	1705	1706	8	2017	0	115.9	1 HDPE	GWWSB	Owens St	2/22/2018 0:00	No	No		
	S 11th St	1706	1694	8	2017	0	288.0	1 HDPE	GWWSB	Owens St	2/22/2018 0:00	No	No		
Checked O	Crenshaw /	1719	8022	8	0	282.1	4 Concrete	GWWSB	Hickory St	4/3/2019 0:00	Yes				
Checked O	Central Av	1606	1607	8	0	505.0	3 VCP	GWWSB	Hickory St	9/10/2019 0:00	No	No			



Rodder Brc Patton St	1750	1606	8	Nov-55	0	300.2	1 VCP	GWWWSB	Hickory St	9/10/2019 0:00	No	No	
Checked O Piedmont /	1761	1712	8	2017	0	400.0	1 CIPP	GWWWSB	West River WWTP	2/22/2018 0:00	No	No	
Checked O Piedmont /	1762	1761	8	2017	0	336.5	1 CIPP	GWWWSB	West River WWTP	2/22/2018 0:00	No	No	
S 11th St	1711	1712	8	2017	0	315.9	1 CIPP	GWWWSB	West River WWTP	2/22/2018 0:00	No	No	
S 11th St	1712	1713	8	2017	0	55.7	1 CIPP	GWWWSB	West River WWTP	2/22/2018 0:00	No	No	
Checked O Elwin Ave	1815	1707	8		0	331.5	Concrete	GWWWSB	West River WWTP	4/11/2018 0:00			
Checked O Elwin Ave	0	1816	8		0	343.0	2 Concrete	GWWWSB	West River WWTP	6/8/2018 0:00			
JC Clayton Av	316	1850	8		0	562.5	VCP	GWWWSB	S 6th St	4/11/2018 0:00			
Point repai Highland A	1857	232	6		0	590.2	4 VCP	GWWWSB	S 6th St	1/14/2020 0:00	Yes	No	
Lookout A	1862	1863	8		0	236.7	3 VCP	GWWWSB	S 6th St	5/8/2019 0:00	No	No	
Perry St	224	223	8		0	91.4	2 PVC	GWWWSB	S 6th St	4/25/2019 0:00			
Anderson /	223	222	8		0	259.3	3 PVC	GWWWSB	S 6th St	4/25/2019 0:00			
Anderson /	222	221	8		0	74.8	3 PVC	GWWWSB	S 6th St	4/25/2019 0:00			
Charles St	1879	1880	8		0	84.5	3 PVC	GWWWSB	S 6th St	4/25/2019 0:00	No	No	
Charles St	1880	221	8		0	148.5	1 PVC	GWWWSB	S 6th St	4/25/2019 0:00	No	No	
Clayton Av	1889	1888	8		0	130.8	5 VCP	GWWWSB	S 6th St	4/22/2019 0:00	No	No	
Short Hins	1352	1353	8		0	121.4	3 VCP	GWWWSB	S 6th St	4/3/2019 0:00	Yes		
Black Creel	1350	1899	12		0	470.3	3 VCP	GWWWSB	S 6th St	3/5/2019 0:00			
Black Creel	1899	1349	12		0	240.2	3 VCP	GWWWSB	S 6th St	3/6/2019 0:00			
1"" Copper Black Creel	1900	8019	12		0	228.3	3 VCP	GWWWSB	S 6th St	1/22/2019 0:00			
Lakefront S	1902	8019	15		0	309.3	3 Concrete	GWWWSB	S 6th St	1/16/2019 0:00			
E Tuscaloo	324	323	6		0	131.2	3 VCP	GWWWSB	S 6th St	2/28/2019 0:00			
N 37th St	319	1909	8		0	340.1	5 VCP	GWWWSB	S 6th St	3/1/2018 0:00	Yes	Yes	
Sommersw	1913	370	8		0	379.3	3 VCP	GWWWSB	S 6th St	1/16/2020 0:00	No	No	
N 33rd St	5227	368	6		0	323.5	4 VCP	GWWWSB	S 6th St	3/26/2019 0:00	Yes		
N 37th St	1919	319	6		0	278.3	4 VCP	GWWWSB	S 6th St	3/2/2018 0:00	Yes	No	
	0	1930	6		0	223.0	VCP	GWWWSB	S 6th St	3/9/2018 0:00			
Carolyn Ct	1948	1947	8	1958	0	130.2	2 VCP	GWWWSB	N Gadsden B	7/10/2018 0:00			
Rosewood	1952	1945	8	1958	0	345.3	4 Concrete	GWWWSB	N Gadsden B	12/7/2018 0:00	No	No	
	1945	1953	8	2006	0	156.2	1 HDPE	GWWWSB	N Gadsden B	3/12/2018 0:00	No	No	
JBWT Proj. Hooks Lake	2018	2019	8	2/10/2009	0	319.0	2 CIPP	GWWWSB	N Gadsden B	6/20/2018 0:00	No	No	
Musca4ne HF3 03 Noi	2041	2039	8	1958	0	450.0	4 Concrete	GWWWSB	N Gadsden B	11/30/2018 0:00	No	No	
Wisteria Lr HF3 03 Noi	2045	2046	8	1958	0	399.7	4 Concrete	GWWWSB	N Gadsden B	11/27/2018 0:00	No	No	
Princeton / HF3 03 Noi	2048	2047	8	1958	0	409.1	4 Concrete	GWWWSB	N Gadsden B	11/20/2018 0:00	No	No	
Princeton / North Gad:	2054	45	8	1958	0	75.0	Concrete	GWWWSB	N Gadsden A	2/11/2019 0:00			
P-04078	1996	45	8	Oct-09	0	365.9	1 PVC	GWWWSB	N Gadsden A	2/11/2019 0:00			
Intruding S Columbia / North Gad:	2001	1995	8	1958	0	364.1	4 Concrete	GWWWSB	N Gadsden A	2/11/2019 0:00	No	No	
Columbia / North Gad:	0	5262	8	1958	0	347.0	4 Concrete	GWWWSB	N Gadsden A	2/11/2019 0:00			
Carleen St North Gad:	2068	1980	8	1958	0	195.4	3 Concrete	GWWWSB	N Gadsden A	5/31/2018 0:00			
Harwood C 15997	1219	2081	2080	8	2014	0	80.8	3 CIPP	GWWWSB	6/1/2014 0:00	CIPP	No	
Harwood C P-11035	998	2080	2082	8	2012	0	250.4	0 CIPP	GWWWSB	6/1/2012 0:00	CIPP	Yes	
Mayfield D	2094	2095	8	1967	0	312.3	3 Concrete	GWWWSB	Browning Circle	11/28/2018 0:00	No	No	
McCoy St North Gad:	2108	2106	8	1958	0	360.9	5 Concrete	GWWWSB	Browning Circle	12/10/2018 0:00	Yes	Yes	
Carolyn Ln	1947	2119	8	1958	0	371.9	4 Concrete	GWWWSB	N Gadsden B	12/7/2018 0:00			
Carolyn Ln	2119	1935	8	1958	0	295.7	4 Concrete	GWWWSB	N Gadsden B	12/7/2018 0:00			
Avalon Ln	2138	1942	8	1958	0	277.5	4 Concrete	GWWWSB	N Gadsden B	2/8/2019 0:00	No	No	
Morningvik	2142	2141	8	1958	0	301.0	3 Concrete	GWWWSB	N Gadsden B	2/8/2019 0:00			
Dublin St	42	2153	8	1958	0	129.8	3 Concrete	GWWWSB	N Gadsden B	4/2/2019 0:00			
Brentwooc North Gad:	2163	2164	8	1958	0	311.2	3 Concrete	GWWWSB	N Gadsden A	2/8/2019 0:00			
Graves St P-11035	998	2165	2166	8	2012	0	433.9	4 CIPP	GWWWSB	CIPP	N Gadsden A	12/13/2018 0:00	Yes
Ewing Ave	2164	2167	8	2006	0	362.2	1 HDPE		N Gadsden A	6/1/2006 0:00	Pipe Burst		
Graves St JBWT 1000	997	2172	1960	8	9/21/2010	0	401.0	2 CIPP	GWWWSB	9/21/2010 0:00	CIPP		
Graves St JBWT 1000	997	2170	2172	8	9/21/2010	0	300.0	2 CIPP	GWWWSB	9/21/2010 0:00	CIPP	No	
CIP inside Goldenrod North Gad:	2007	2005	8	3/20/2014	0	400.8	2 CIPP	GWWWSB	3/20/2014 0:00	CIPP	N Gadsden A	12/27/2018 0:00	No

CIP inside c Goldenrod North Gad:	2008	2007	8	3/20/2014	0	300.1	2 CIPP	GWWWSB	3/20/2014 0:00 CIPP	N Gadsden A	12/27/2018 0:00 No	No
Presley Ave North Gad:	2005	2004	8	3/20/2014	0	347.0	2 CIPP	GWWWSB	3/20/2014 0:00 CIPP	N Gadsden A	2/15/2019 0:00 No	No
	2004	2180	10		0	337.1	2 PVC	GWWWSB		N Gadsden A	2/15/2019 0:00	
Auburn Av.	2180	2179	8	2006	0	192.7	HDPE		6/1/2006 0:00 Pipe Burst	N Gadsden A	2/15/2019 0:00	
Princeton / HF3 03 Noi	0	2048	8	1958	0	111.9	4 Concrete	GWWWSB		N Gadsden B	11/20/2018 0:00 Yes	No
Encrustatic Wisteria Lr HF3 03 Noi	2047	2045	8	1958	0	374.3	4 Concrete	GWWWSB		N Gadsden B	11/27/2018 0:00 No	No
Midway Av HF3 03 Noi	2040	2039	8	1958	0	350.0	3 Concrete	GWWWSB		N Gadsden B	11/30/2018 0:00 No	No
Offset Join Midway Av HF3 03 Noi	0	2040	8	1958	0	300.1	3 Concrete	GWWWSB		N Gadsden B	11/30/2018 0:00 No	No
Hooks Lake	2211	2210	8		0	300.7	5 Concrete	GWWWSB		N Gadsden B	5/13/2019 0:00 No	Yes
Hooks Lake HF3 03 Noi	2210	2204	8	1958	0	379.8	5 Concrete	GWWWSB		N Gadsden B	5/13/2019 0:00 No	Yes
Chadwick S HF3 03 Noi	2220	5259	8	1958	0	151.0	4 Concrete	GWWWSB		N Gadsden B	12/6/2018 0:00	
Longitude / Tidmore Br HF3 03 Noi	2042	2219	8	1958	0	294.3	5 Concrete	GWWWSB		N Gadsden B	12/6/2018 0:00	
HF3 03 Noi	2221	2222	8	1958	0	204.4	5 Concrete	GWWWSB		N Gadsden B	12/5/2018 0:00	Yes
EOL Repair HF3 03 Noi	2222	2219	8	1958	0	40.1	5 Concrete	GWWWSB		N Gadsden B	12/5/2018 0:00	
Musca4ne HF3 03 Noi	2223	2221	8	1958	0	356.1	5 Concrete	GWWWSB		N Gadsden B	12/4/2018 0:00 Yes	No
Wisteria Lr HF3 03 Noi	2046	2042	8	1958	0	392.9	5 Concrete	GWWWSB		N Gadsden B	12/3/2018 0:00 No	No
JBWT Proj. Hooks Lake	2256	5143	8	2/10/2009	0	368.7	1 CIPP	GWWWSB	2/10/2009 0:00 CIPP	N Gadsden B	2/12/2019 0:00 No	No
Duncan Av	2266	2264	8		0	402.2	1 PVC	GWWWSB		Browning Circle	4/27/2018 0:00 No	No
Hopkins Dr	2274	2273	8		0	375.6	2 PVC	GWWWSB		Browning Circle	8/30/2018 0:00	
Hopkins Dr	2273	2272	8		0	31.3	2 PVC	GWWWSB		Browning Circle	8/30/2018 0:00	
N 5th St	6033	2341	8		0	461.8	VCP	GWWWSB		S 6th St	3/6/2018 0:00	
N 5th St	2341	2342	6		0	159.2	VCP	GWWWSB		S 6th St	3/2/2018 0:00	
	2345	32	6	1924	0	330.6	3 VCP	Housing Authority		S 6th St	11/2/2018 0:00	
N 6th St	864	862	12		0	316.0	3 VCP	GWWWSB		S 6th St	11/2/2018 0:00	
	844	2348	8		0	115.2	3 VCP	GWWWSB		S 6th St	9/26/2018 0:00	
	2348	2349	8		0	72.0	2 DIP	GWWWSB		S 6th St	8/13/2018 0:00	
	2349	2350	8		0	12.6	2 DIP	GWWWSB		S 6th St	9/26/2018 0:00	
	2350	2351	8		0	135.2	2 VCP	GWWWSB		S 6th St	8/13/2018 0:00	
	2351	2352	8		0	152.2	3 VCP	GWWWSB		S 6th St	9/26/2018 0:00	
	2352	864	8		0	246.2	3 VCP	Housing Authority		S 6th St	10/25/2018 0:00	
	0	2351	6		0	175.2	2 VCP	Housing Authority		S 6th St	9/26/2018 0:00	
NO VIDEO	867	2356	8		0	56.4	VCP	GWWWSB		S 6th St	3/2/2018 0:00	
N 6th St	2356	866	8		0	133.3	2 VCP	GWWWSB		S 6th St	7/27/2018 0:00	
	2354	866	6		0	125.4	0 VCP	Housing Authority		S 6th St	7/30/2018 0:00	
N 6th St	2355	866	6		0	89.5	2 VCP	GWWWSB		S 6th St	7/27/2018 0:00	
	2353	2355	8		0	113.8	3 VCP	GWWWSB		S 6th St	10/2/2018 0:00	
	2357	2355	8		0	26.4	2 VCP	Housing Authority		S 6th St	7/27/2018 0:00	
	0	2357	6		0	85.1	3 VCP	Housing Authority		S 6th St	10/2/2018 0:00	
Severe intr	0	2357	8		0	167.9	3 VCP	Housing Authority		S 6th St	10/2/2018 0:00	
	2358	867	8		0	496.0	4 VCP	GWWWSB		S 6th St	11/16/2018 0:00	
VCP/PVC N 8th St	796	813	10	1924	0	319.4	3 VCP			S 6th St	7/16/2018 0:00	
3/1/1989 Milton St	0	842	6	3/1/1989	0	103.2	2 VCP			S 6th St	7/17/2018 0:00	
Tuscaloosa	2359	2353	6	1924	0	713.9	2 VCP	GWWWSB		S 6th St	8/9/2018 0:00	
Tuscaloosa	0	2359	6		0	190.3	2 VCP	GWWWSB		S 6th St	8/6/2018 0:00	
Glen Iris Dr	2369	2368	8		0	385.9	3 VCP	GWWWSB		S 6th St	6/17/2019 0:00 No	No
Bellview Av	2368	2363	8		0	163.0	2 VCP	GWWWSB		S 6th St	6/17/2019 0:00 No	No
	0	2363	6		0	283.8	3 VCP	GWWWSB		S 6th St	6/17/2019 0:00 Yes	No
Bellview Av	0	0	8		0	159.1	4 VCP	GWWWSB		S 6th St	6/18/2019 0:00 Yes	No
ABS Spring St	2366	2367	6		0	219.7	3 VCP	GWWWSB		S 6th St	6/11/2018 0:00	
Bretwood l	0	2362	8	1924	0	387.5	4 VCP	GWWWSB		S 6th St	6/18/2019 0:00 Yes	No
Hurst St	0	2374	6	1924	0	410.3	VCP	GWWWSB		S 6th St	3/1/2018 0:00	
Braid Ave	2376	2379	6		0	36.6	3 VCP	GWWWSB		S 6th St	2/13/2019 0:00	
Braid Ave	2379	2378	6		0	42.0	3 VCP	GWWWSB		S 6th St	2/13/2019 0:00	
Braid Ave	2377	2375	6		0	106.6	3 VCP	GWWWSB		S 6th St	5/29/2019 0:00 No	No



Abercrombie	2375	2380	8	1924	0	495.6	3 VCP	GWWSB	S 6th St	5/29/2019 0:00	No	No
Tuscaloosa	745	2382	8	1924	0	355.7	VCP	GWWSB	S 6th St	2/27/2018 0:00		
Plainview S	749	2383	8	1924	0	135.2	3 VCP	GWWSB	S 6th St	5/23/2019 0:00	No	No
Tuscaloosa	746	745	6		0	233.6	3 VCP	GWWSB	S 6th St	5/8/2019 0:00	No	No
	2387	2377	6		0	390.4	4 VCP	GWWSB	S 6th St	2/13/2019 0:00		
Hillier St	0	2384	8		0	324.7	1 PVC	GWWSB	S 6th St	2/13/2019 0:00		
Hillier St	2384	2376	8		0	124.9	4 VCP	GWWSB	S 6th St	2/13/2019 0:00		
E Tuscaloosa	2390	324	6		0	585.0	4 VCP	GWWSB	S 6th St	3/4/2019 0:00	Yes	Yes
Cabot Ave	322	323	8		0	71.3	3 VCP	GWWSB	S 6th St	1/30/2019 0:00		
Gladys St	1928	326	6		0	285.2	4 VCP	GWWSB	S 6th St	11/5/2018 0:00	Yes	
	326	2393	6		0	270.0	4 VCP	GWWSB	S 6th St	2/4/2019 0:00		
VCP/PVC E Wilkinsor	0	1932	6		0	368.1	VCP	GWWSB	S 6th St	4/30/2018 0:00		
Cabot Ave	327	320	8		0	397.1	4 VCP	GWWSB	S 6th St	1/30/2019 0:00		
Cabot Ave	320	322	8		0	353.0	4 VCP	GWWSB	S 6th St	1/28/2019 0:00		Yes
Dozier Ave	2408	2409	8		0	134.8	3 VCP	GWWSB	S 6th St	4/2/2019 0:00		
Dozier Ave	2409	1352	8		0	375.8	3 VCP	GWWSB	S 6th St	4/2/2019 0:00	Yes	
Dozier Ave	0	2408	8		0	180.4	3 VCP	GWWSB	S 6th St	4/2/2019 0:00	Yes	
Dozier Ave	0	1352	6		0	275.4	3 VCP	GWWSB	S 6th St	4/3/2019 0:00	Yes	
Checked O Springfield	2693	2694	8		0	135.0	3 Concrete	GWWSB	Green Pasture	6/7/2019 0:00	No	No
Checked O Springfield	0	2694	8		0	410.1	3 Concrete	GWWSB	Green Pasture	6/7/2019 0:00	No	No
Checked O Cypress St	2694	2700	8		0	331.9	3 Concrete	GWWSB	Green Pasture	11/25/2019 0:00	No	No
Checked O Bonton Av	2714	2715	10	2017	0	268.0	1 HDPE	GWWSB	Green Pasture	2/22/2018 0:00	No	No
Checked O Bonton Av	2709	2715	10	2017	0	294.2	1 HDPE	GWWSB	Green Pasture	2/22/2018 0:00	No	No
Checked O Springfield	2696	0	10		0	211.7	3 Concrete	GWWSB	Green Pasture	4/9/2019 0:00	No	Yes
Checked O Springfield	264	2717	12		0	359.3	5 Concrete	GWWSB	Green Pasture	4/8/2019 0:00		Yes
Varies Fror Armstrong	0	0	8		0	61.7	3 VCP	GWWSB	Green Pasture	3/13/2019 0:00		
Varies Fror Silver Ave	2727	2726	8		0	135.5	2 HDPE	GWWSB	Green Pasture	4/9/2019 0:00		
Full pipe se	2726	2806	8		0	219.1	3 HDPE	GWWSB	Green Pasture	4/9/2019 0:00		
Intruding S Windsor St	2681	2679	8		0	367.0	5 Concrete	GWWSB	Green Pasture	11/1/2018 0:00		
1941 ? Taylor St	2452	2479	6		0	432.7	3 VCP	GWWSB	East River WWTP	1/2/2020 0:00	No	No
Gas Main in Barksdale S	0	2453	6		0	310.0	4 VCP	GWWSB	East River WWTP	1/6/2020 0:00		
ABS due to Taylor St	0	2453	6		0	410.4	4 VCP	GWWSB	East River WWTP	1/6/2020 0:00		
Mary St	104	2527	6		0	447.5	VCP	GWWSB	East River WWTP	3/8/2018 0:00		
Mary St	0	103	6	1929	0	439.0	VCP	GWWSB	East River WWTP	3/8/2018 0:00		
VCP/CIP (P) Lay St	106	105	8		0	326.5	3 VCP		East River WWTP	10/16/2019 0:00	No	No
Lay St	2754	106	6		0	101.1	VCP	GWWSB	East River WWTP	3/9/2018 0:00		
Lay St	2755	2754	6		0	131.1	VCP	GWWSB	East River WWTP	3/9/2018 0:00		
JC Slusser Ave	2756	2519	8		0	301.0	VCP	GWWSB	East River WWTP	4/5/2018 0:00		
Litchfield A	2456	2489	8		0	414.1	3 VCP	GWWSB	East River WWTP	1/24/2019 0:00		
Blythe St	2774	2506	15		0	211.2	VCP	GWWSB	East River WWTP	3/12/2018 0:00		
Wilson Ave	2771	2775	15		0	318.6	VCP	GWWSB	East River WWTP	3/12/2018 0:00		
Wilson Ave	2775	2770	15		0	265.6	VCP	GWWSB	East River WWTP	3/12/2018 0:00		
Raley St	0	0	8		0	346.5	3 VCP	GWWSB	East River WWTP	10/16/2019 0:00	No	No
Offset Join Raley St	0	2495	6		0	538.0	4 VCP	GWWSB	East River WWTP	10/16/2019 0:00	No	No
Intruding S Windsor St	0	0	8		0	381.9	5 Concrete	GWWSB	Green Pasture	11/1/2018 0:00		
Lula St	2716	2854	12		0	370.8	RCP	GWWSB	Green Pasture	2/25/2019 0:00		Yes
Fuller St	2418	2419	6		0	189.7	5 VCP	GWWSB	East River WWTP	7/9/2019 0:00	Yes	No
Fuller St	0	0	6		0	100.2	3 VCP	GWWSB	East River WWTP	7/9/2019 0:00	Yes	No
Goss Ave	2560	2558	6		0	344.0	VCP	GWWSB	East River WWTP	5/17/2018 0:00		
Har4n Cir	2859	2557	6		0	220.2	VCP	GWWSB	East River WWTP	5/17/2018 0:00		
Checked O Hardin Cir	2860	2861	6	Mar-56	0	200.0	3 VCP	GWWSB	East River WWTP	5/17/2018 0:00		
Checked O Har4n Cir	2861	2862	6	Mar-56	0	300.1	Concrete	GWWSB	East River WWTP	5/17/2018 0:00		
Checked O Eastview A	0	2559	6		0	160.1	VCP	GWWSB	East River WWTP	3/5/2018 0:00		
Concrete / Allan St	2557	2560	6	Jan-56	0	313.9	Concrete	GWWSB	East River WWTP	5/16/2018 0:00		



Many intru	Allan St			2584	2580	8		0	260.8	4 VCP	GWWWSB		East River WWTP	10/1/2018 0:00			
	Allan St			2863	2584	8		0	140.9	3 VCP	GWWWSB		East River WWTP	10/1/2018 0:00			
	Hillmont A			2890	2889	8		0	349.5		HDPE		East River WWTP	3/5/2018 0:00			
	Greenwoor			2881	2893	8		0	385.9		HDPE	GWWWSB	East River WWTP	3/5/2018 0:00			
	Miller St			0	0	8	8/11/1978	0	336.5	3 PVC	GWWWSB		East River WWTP	11/5/2019 0:00	No	No	
	Murphy St			0	0	8	1978	0	299.4	3 PVC	GWWWSB		East River WWTP	7/16/2019 0:00	No	No	
	Roberts Cir			0	0	8	1978	0	340.0	3 PVC	GWWWSB		East River WWTP	7/16/2019 0:00	No	No	
	Egg Shaper	Roberts Cir			0	0	8	1978	0	263.3	4 PVC	GWWWSB		East River WWTP	7/16/2019 0:00	No	No
	Roberts Cir			0	0	8	1978	0	231.7	3 PVC	GWWWSB		East River WWTP	7/16/2019 0:00	No	No	
	Egg Shaper	Roberts Cir			0	0	8	1978	0	338.8	3 PVC	GWWWSB		East River WWTP	7/16/2019 0:00	No	No
	Elizabeth S			0	0	8	1978	0	300.1	3 PVC	GWWWSB		East River WWTP	7/16/2019 0:00	No	No	
	ABS @ 165	Miller Ave			0	242	8	8/11/1978	0	342.8	PVC	GWWWSB		East River WWTP	3/12/2018 0:00		
					2911	2410	8		0	361.3		CIPP	GWWWSB	East River WWTP	10/22/2018 0:00		
					2411	2918	8	2006	0	163.6	2	HDPE	GWWWSB		10/22/2018 0:00		
	Arcade St	15997	1219	2410	2411	8	2014	0	150.5	1	HDPE	GWWWSB	6/1/2006 0:00 Pipe Burst	East River WWTP	10/22/2018 0:00	No	No
				2922	2929	8	2017	0	119.7	1	CIPP	GWWWSB	6/1/2014 0:00 Pipe Burst	East River WWTP	2/22/2018 0:00	No	No
			568	2929	2923	10	2017	0	240.0	1	CIPP	GWWWSB		East River WWTP	2/22/2018 0:00	No	No
				2923	2928	8	2017	0	188.6	1	CIPP	GWWWSB		East River WWTP	1/23/2018 0:00	No	No
			568	2928	2927	10	2017	0	179.9	1	CIPP	GWWWSB		East River WWTP	2/22/2018 0:00	No	No
			568	2927	2924	10	2017	0	215.3	1	CIPP	GWWWSB		East River WWTP	2/22/2018 0:00	No	No
	Penn Dr			2951	2935	8	2017	0	247.1	1	HDPE	GWWWSB		East River WWTP	2/22/2018 0:00	No	No
	Penn Dr			2935	2936	8	2017	0	345.3	1	HDPE	GWWWSB		East River WWTP	8/21/2018 0:00	No	No
Checked O	Penn Dr			2936	2937	8	2017	0	254.7	1	HDPE	GWWWSB		East River WWTP	8/22/2018 0:00	No	No
Checked O	Penn Dr			2937	2938	8	2017	0	336.6	1	HDPE	GWWWSB		East River WWTP	8/22/2018 0:00	No	No
Longitudal	Augusta St			2600	2956	8		0	184.3	5	Concrete	GWWWSB		East River WWTP	2/14/2019 0:00		
Checked O	Augusta St			2956	2599	8		0	274.0	5	Concrete	GWWWSB		East River WWTP	2/14/2019 0:00		
	Beach Ln			3029	2536	6		0	234.9	5	Concrete	GWWWSB		East River WWTP	11/20/2018 0:00		
	Gordon St			239	2567	6		0	382.6	4	VCP	GWWWSB		East River WWTP	10/19/2018 0:00		
	Kentucky A			2546	239	6		0	67.9	3	VCP	GWWWSB		East River WWTP	10/19/2018 0:00		
Checked O	Kentucky A			0	2546	6		0	302.1	4	VCP	GWWWSB		East River WWTP	10/19/2018 0:00		
	Sewell Ave			0	3036	6		0	290.0	4	VCP		East River WWTP	10/19/2018 0:00			
	Park St			0	252	6		0	468.5	4	VCP	GWWWSB		East River WWTP	3/1/2018 0:00	Yes	No
	E Broad St			3039	5052	8		0	360.7	3	VCP	GWWWSB		East River WWTP	3/28/2019 0:00	Yes	
Checked O				3055	2571	6		0	278.4	4	Concrete	GWWWSB		East River WWTP	8/5/2019 0:00	Yes	Yes
	Moton St			2575	2574	6		0	220.3	2	VCP	GWWWSB		East River WWTP	5/10/2018 0:00		
	Lincoln Ave			3064	5439	8	1962	0	200.0		VCP	GWWWSB		East River WWTP	5/10/2018 0:00		
Checked O	21st St N			0	3055	6		0	226.9	5	Concrete	GWWWSB		East River WWTP	5/4/2018 0:00	No	No
Checked O	Florida Ave			2664	2663	8		0	306.6	2	Concrete	GWWWSB		East River WWTP	8/13/2018 0:00		
	Riverside C HF3 02B, P	658		0	0	8	1987	0	283.1	3	PVC	GWWWSB		East River WWTP	8/21/2019 0:00	No	No
	E Cherry St			0	2610	8		0	270.3	2	VCP	GWWWSB		East River WWTP	6/8/2018 0:00		
Suncoast Ir				3231	5340	8	2012	0	307.5	4	CIPP	GWWWSB	6/1/2012 0:00 CIPP	East River WWTP	11/7/2018 0:00		
				2618	2611	8		0	446.1		VCP	GWWWSB		East River WWTP	8/18/2018 0:00		
	Griffin St			0	2624	6		0	290.5	3	VCP	GWWWSB		East River WWTP	4/11/2019 0:00		
Intruding S	E Chestnut			2630	3271	6		0	229.1	3	VCP	GWWWSB		East River WWTP	10/22/2019 0:00	Yes	No
	E Chestnut			3271	2628	6		0	154.5	3	VCP	GWWWSB		East River WWTP	10/22/2019 0:00	No	No
	E Chestnut			3272	2630	6		0	240.3		VCP	GWWWSB		East River WWTP	10/22/2019 0:00	No	No
	6th St S			0	2630	6		0	160.4	3	VCP	GWWWSB		East River WWTP	10/22/2019 0:00	No	No
ABS	8th St N			2510	3284	8		0	461.0		VCP	GWWWSB		East River WWTP	3/6/2018 0:00		
	Nuckolls St			2527	109	6		0	375.1		VCP	GWWWSB		East River WWTP	3/8/2018 0:00		
	Nuckolls St			109	3302	8		0	232.0		VCP	GWWWSB		East River WWTP	3/8/2018 0:00		
	7th St N			5182	3305	6		0	214.8		VCP	GWWWSB		East River WWTP	3/5/2018 0:00		
	Lay St			3306	236	8		0	159.5		VCP	GWWWSB		East River WWTP	2/6/2018 0:00		
	Nuckolls St			3335	2527	6		0	336.9	4	VCP	GWWWSB		East River WWTP	3/20/2018 0:00	No	No
VCP & CIP I	Grant Ave			3336	2458	8		0	159.9	4	VCP	GWWWSB		East River WWTP	10/29/2019 0:00	No	

			3337	3336	8		0	153.9	3 VCP	GWWSB	East River WWTP	10/29/2019 0:00	No	No	
			3338	3337	8		0	152.0	4 VCP	GWWSB	East River WWTP	10/29/2019 0:00	Yes	No	
	Fuller St		3349	3348	6		0	155.4	3 VCP	GWWSB	East River WWTP	7/11/2019 0:00	No	No	
	Fuller St		3354	3349	6		0	133.1	3 VCP	GWWSB	East River WWTP	7/11/2019 0:00	No	No	
	Fuller St		3355	3354	6		0	103.0	3 VCP	GWWSB	East River WWTP	5/21/2019 0:00	No	No	
	Fuller St		3348	3347	8		0	295.2	3 VCP	GWWSB	East River WWTP	7/11/2019 0:00	No	No	
Intruding S	Hillsboro D		0	0	6		0	400.1	4 VCP	GWWSB	East River WWTP	7/9/2019 0:00	Yes	No	
	Fuller St		0	0	6		0	178.4	3 VCP	GWWSB	East River WWTP	7/9/2019 0:00	No	No	
ABS	Ruth St		0	2564	6		0	318.4	VCP	GWWSB	East River WWTP	3/5/2018 0:00			
	Hillmont A		3454	2563	8		0	212.2	3 PVC	GWWSB	East River WWTP	3/5/2018 0:00	No	No	
	Hillmont A		3457	2886	8		0	154.7	PVC	GWWSB	East River WWTP	3/5/2018 0:00			
	Riverside C HF3 02B, P	658	0	0	8	1987	0	290.7	1 PVC	GWWSB	East River WWTP	4/4/2019 0:00			
	Riverside C HF3 02B, P	658	0	0	8	1987	0	216.1	1 PVC	GWWSB	East River WWTP	4/4/2019 0:00			
ABS	Mountaint		3473	3471	8		0	242.7	VCP	GWWSB	S 6th St	4/2/2018 0:00			
Checked O	Mountaint		3471	3470	8		0	210.8	VCP	GWWSB	S 6th St	4/2/2018 0:00			
	Mountaint	266	0	3469	8	1984	0	200.7	PVC	GWWSB	S 6th St	2/21/2018 0:00			
ABS 59' FRI	Crestview I		778	3474	6		0	549.5	VCP	GWWSB	S 6th St	3/20/2018 0:00			
Checked O			0	778	6	Feb-S1	0	211.0	VCP	GWWSB	S 6th St	3/20/2018 0:00			
Checked O			3469	3476	8	2006	0	284.7	HDPE	GWWSB	S 6th St	2/21/2018 0:00			
			3479	3477	8	2018	0	320.7	5 HDPE	GWWSB	S 6th St	2/14/2018 0:00	No	No	
	Brookside I	1042	3478	3477	8	1971	0	286.4	VCP	GWWSB	S 6th St	2/21/2018 0:00			
Checked O	Brookside I		3475	3474	8		0	322.1	VCP	GWWSB	S 6th St	4/3/2018 0:00			
Checked O	Brookside I		3476	3475	8		0	344.3	VCP	GWWSB	S 6th St	2/27/2018 0:00			
Checked O	Brookside I		3474	786	8		0	462.1	VCP	GWWSB	S 6th St	4/3/2018 0:00			
INTRUDING	Sunnyvale		3480	787	6		0	186.2	2 VCP	GWWSB	S 6th St	11/15/2018 0:00			
	Riverside C HF3 02B, P	658	0	0	8	1987	0	387.1	1 PVC	GWWSB	East River WWTP	4/4/2019 0:00			
Pipe Burst	Lake St		5210	268	6		0	446.0	4 VCP	GWWSB	Hood Ave	3/13/2018 0:00	No	Yes	
			3602	3582	8	10/16/2003	0	157.4	3 DIP	GWWSB	East River WWTP	8/9/2019 0:00	No	No	
	3rd St N		3594	3595	6		0	445.2	3 VCP	GWWSB	East River WWTP	10/12/2018 0:00			
	Elmwood S		2655	2654	8		0	415.4	3 VCP	GWWSB	East River WWTP	10/11/2018 0:00			
	Elmwood S		0	0	10		0	384.3	3 VCP	GWWSB	East River WWTP	10/11/2018 0:00			
	4th St N		5410	2653	8		0	304.0	5 VCP	GWWSB	East River WWTP	3/5/2018 0:00	Yes	No	
	2nd St N		0	2655	6		0	426.9	5 VCP	GWWSB	East River WWTP	10/12/2018 0:00			
	Elmwood S P-11035	998	3596	3607	8	2012	0	410.6	1 HDPE	GWWSB	6/1/2012 0:00 Misc Rehal	10/12/2018 0:00	No	No	
	Hood Ave I		3607	3606	8		0	249.6	4 VCP	GWWSB	Trailor Park	10/11/2018 0:00			
			3606	3608	8		0	293.0	4 VCP	GWWSB	Trailor Park	10/10/2018 0:00	Yes	Yes	
			3610	3609	8		0	222.5	4 VCP	GWWSB	Trailor Park	10/22/2018 0:00	Yes	Yes	
	Lake St		5209	3611	8	2017	0	261.5	1 HDPE	GWWSB	Trailor Park	10/10/2018 0:00	No	No	
	Lake St		3611	3608	8	2017	0	264.3	2 HDPE	GWWSB	Trailor Park	10/10/2018 0:00	No	No	
Checked O	7th Ave E		7075	3615	8		0	208.8	1 HDPE	GWWSB	Hood Ave	8/22/2018 0:00	No	No	
Checked O	7th Ave E		3617	3616	8	2017	0	161.9	1 HDPE	GWWSB	Hood Ave	2/22/2018 0:00	No	No	
Checked O	7th Ave E		3615	3617	8	2017	0	117.3	1 HDPE	GWWSB	Hood Ave	2/21/2018 0:00	No	No	
Checked O	7th Ave E		3616	3562	8	2017	0	297.3	1 HDPE	GWWSB	Hood Ave	2/22/2018 0:00	No	No	
	Litchfield A		2447	2449	8		0	896.7	3 VCP	GWWSB	East River WWTP	5/21/2019 0:00	No	No	
	Blythe St		3654	3653	15		0	178.5	PVC	GWWSB	East River WWTP	3/13/2018 0:00			
			3653	2774	15		0	44.3	PVC	GWWSB	East River WWTP	3/13/2018 0:00			
	Meadowbr		3713	3712	8		0	381.1	4 Concrete	GWWSB	Green Pasture	2/25/2019 0:00	Yes	Yes	
	Nunnally A		0	2672	8		0	372.1	4 Concrete	GWWSB	East River WWTP	1/22/2019 0:00			
Change Ori	McElroy A JBWT 1000	997	3743	3775	10	9/21/2010	0	386.4	2 CIPP	GWWSB	9/21/2010 0:00 CIPP	Air Service Rd	4/17/2019 0:00	No	Yes
Checked O	E Broad St		0	0	8		0	315.1	3 Concrete	GWWSB	East River WWTP	11/13/2019 0:00	No	No	
Checked O	E Broad St		0	0	8		0	300.0	3 Concrete	GWWSB	East River WWTP	11/13/2019 0:00	No	No	
Checked O	E Broad St		3791	3785	8		0	367.6	3 Concrete	GWWSB	East River WWTP	11/13/2019 0:00	No	No	
Checked O	Thompson		3787	3786	8		0	344.8	3 Concrete	GWWSB	East River WWTP	11/13/2019 0:00	Yes	Yes	
	E Broad St		6046	3790	8		0	303.6	1 Concrete	GWWSB	East River WWTP	11/8/2019 0:00	No	No	



Checked O E Broad St		3790	3789	8		0	358.9	3 Concrete	GWWWSB	East River WWTP	11/12/2019 0:00	No	No	
Checked O E Broad St		3789	3788	8		0	295.1	3 Concrete	GWWWSB	East River WWTP	11/12/2019 0:00	No	No	
Checked O E Broad St		0	3787	8		0	315.9	4 Concrete	GWWWSB	East River WWTP	11/12/2019 0:00	No	Yes	
Checked O E Broad St		3785	3787	8		0	364.3	Concrete	GWWWSB	East River WWTP	11/13/2019 0:00	No	Yes	
Intruding S Gurley Ave		0	3793	8		0	359.7	3 Concrete	GWWWSB	East River WWTP	11/13/2019 0:00	No	No	
Checked O Gurley Ave		3793	3786	8		0	348.8	4 Concrete	GWWWSB	East River WWTP	11/13/2019 0:00	No	Yes	
Checked O		3786	3802	8		0	307.3	5 Concrete	GWWWSB	East River WWTP	11/14/2019 0:00	Yes	No	
Checked O		3802	3801	8	2006	0	325.1	3 HDPE	GWWWSB	6/1/2006 0:00 Pipe Burst	East River WWTP	11/14/2019 0:00	No	No
Sag in pipe		3801	3807	8	2006	0	320.2	3 HDPE	GWWWSB	6/1/2006 0:00 Pipe Burst	East River WWTP	11/15/2019 0:00		
Dodd St		3810	3809	8		0	235.1	3 Concrete	GWWWSB	East River WWTP	11/18/2019 0:00	No	No	
Checked O Marker Rd		0	3803	8		0	280.1	4 Concrete	GWWWSB	East River WWTP	11/18/2019 0:00	No	No	
Plugged at		5283	3802	8		0	200.1	5 Concrete	GWWWSB	East River WWTP	11/13/2019 0:00	No	No	
Butler St JBWT 1000	997	3829	3745	8	9/21/2010	0	410.1	3 CIPP	GWWWSB	9/21/2010 0:00 CIPP	Air Service Rd	1/21/2020 0:00	No	No
S/L at end Butler St		0	3829	8		0	130.4	4 VCP	Private		Air Service Rd	1/21/2020 0:00		
Calhoun Dr		3807	3808	8	2006	0	344.2	3 HDPE	GWWWSB	6/1/2006 0:00 Pipe Burst	East River WWTP	11/15/2019 0:00	No	No
College Pk	901	0	3838	8	1982	0	142.5	1 PVC	GWWWSB		East River WWTP	7/31/2018 0:00		
Multiple S College Pk	901	3838	3836	8	1982	0	223.5	2 PVC	GWWWSB		East River WWTP	7/31/2018 0:00		
Infiltration Sizemore S	16014	1143	5451	2726	8	2013	0	400.3	2 HDPE	GWWWSB	6/1/2013 0:00 Pipe Burst	Green Pasture	4/9/2019 0:00	Yes
		3977	3976	8	1987	0	384.7	PVC	GWWWSB		MH6052-RBC	3/26/2018 0:00		
Wildhaven		3984	3980	8	1987	0	150.9	3 PVC	GWWWSB		MH6052-RBC	8/9/2019 0:00	No	No
Wildhaven		3975	3986	8	1987	0	223.6	2 HDPE	GWWWSB		MH6052-RBC	5/6/2019 0:00	No	Yes
Wildhaven		3986	3985	8	1987	0	264.5	2 HDPE	GWWWSB		MH6052-RBC	5/6/2019 0:00	No	No
Norwood C		3990	3991	8		0	302.1	2 HDPE	GWWWSB		MH6052-RBC	5/6/2019 0:00	No	No
Norwood C		3991	3992	8		0	135.1	2 PVC	GWWWSB		MH6052-RBC	5/6/2019 0:00	No	No
Norwood C		3992	3985	8	1987	0	196.3	2 HDPE	GWWWSB		MH6052-RBC	5/6/2019 0:00	No	No
Checked O Manor St HF3 04, Ra		4131	4127	8	1969	0	70.5	3 VCP	GWWWSB		Eura Brown	8/29/2019 0:00	No	No
Cordell Ct HF3 04, Ra		4137	4128	8	1969	0	370.4	4 Concrete	GWWWSB		Rainbow Dr	9/16/2019 0:00	No	No
Checked O Manor St HF3 04, Ra		4142	4129	8	1969	0	263.2	3 VCP	GWWWSB		Eura Brown	8/28/2019 0:00	No	No
Cordell St		5226	4128	8		0	148.8	4 Concrete	GWWWSB		Rainbow Dr	9/11/2019 0:00	No	No
Checked O Manor St HF3 04, Ra		4132	4131	8	1969	0	402.4	3 VCP	GWWWSB		Eura Brown	8/29/2019 0:00	No	No
Checked O Manor St HF3 04, Ra		4129	4130	8	1969	0	267.0	4 VCP	GWWWSB		Eura Brown	8/28/2019 0:00	Yes	No
Checked O Cordell St HF3 04, Ra		4133	4127	8	1969	0	299.4	3 VCP	GWWWSB		Eura Brown	9/11/2019 0:00	Yes	No
Checked O Cordell St HF3 04, Ra		4135	4136	8	1969	0	128.4	3 VCP	GWWWSB		Eura Brown	9/11/2019 0:00	No	No
COB - 300' Cordell St HF3 04, Ra		4136	4134	8	1969	0	273.5	3 VCP	GWWWSB		Eura Brown	9/11/2019 0:00	No	No
Checked O Cordell St HF3 04, Ra		4134	4133	8	1969	0	299.5	3 VCP	GWWWSB		Eura Brown	9/11/2019 0:00	No	No
Cordell St HF3 04, Ra		4128	4138	8	1969	0	235.6	4 Concrete	GWWWSB		Rainbow Dr	9/11/2019 0:00	No	No
Alpine View		4151	4150	6		0	310.6	1 VCP	GWWWSB		Rainbow Dr	8/1/2019 0:00	Yes	No
Alpine View		4150	4149	8		0	210.3	3 VCP	GWWWSB		Rainbow Dr	8/7/2019 0:00	Yes	Yes
Forrestine		4149	4152	8		0	154.7	3 VCP	GWWWSB		Rainbow Dr	8/7/2019 0:00	No	No
Pipe is 4' 1 Forrestine		4152	4153	8		0	140.2	4 VCP	GWWWSB		Rainbow Dr	8/7/2019 0:00	Yes	No
Checked O Alcott Rd		0	4143	6	Jan-53	0	150.1	3 Concrete	GWWWSB		Rainbow Dr	10/3/2019 0:00	No	No
Intruding S Alcott Rd		0	4143	6		0	135.0	4 VCP	GWWWSB		Rainbow Dr	10/3/2019 0:00	No	No
Intruding S Alpine View		0	4159	6	Jan-56	0	162.9	3 VCP	GWWWSB		Rainbow Dr	9/30/2019 0:00	No	No
Intruding S Alpine View		4159	4158	6	Jan-56	0	203.0	4 VCP	GWWWSB		Rainbow Dr	9/30/2019 0:00	No	No
Offset Pipe Alpine View		4158	4157	6	Jan-56	0	166.0	4 Concrete	GWWWSB		Rainbow Dr	9/30/2019 0:00	No	No
Intruding S Alpine View		4157	4156	6	Jan-56	0	218.0	4 VCP	GWWWSB		Rainbow Dr	9/30/2019 0:00	No	No
Checked O Alpine View		4156	4144	6	Nov-54	0	232.2	3 Concrete	GWWWSB		Rainbow Dr	9/30/2019 0:00	No	No
Checked O Alcott Rd		4145	4144	8	Nov-55	0	211.1	4 Concrete	GWWWSB		Rainbow Dr	9/20/2019 0:00	No	No
Emerson St		4144	206	8	Nov-54	0	598.8	3 Concrete	GWWWSB		Rainbow Dr	10/1/2019 0:00	No	No
Intruding S Holmes St		4143	207	6	Jul-51	0	594.9	3 VCP	GWWWSB		Rainbow Dr	10/3/2019 0:00	No	No
Forrestine		209	211	8	2006	0	449.6	3 HDPE		6/1/2006 0:00 Pipe Burst	Rainbow Dr	8/12/2019 0:00	No	No
Forrestine		0	4355	6		0	540.2	4 VCP	GWWWSB		Rainbow Dr	8/7/2019 0:00	Yes	No
Forrestine		4355	209	8	2006	0	88.2	3 HDPE	GWWWSB		Rainbow Dr	8/12/2019 0:00	No	No
Checked O Alpine View		4183	4184	6		0	245.1	4 VCP	GWWWSB		Rainbow Dr	7/30/2019 0:00	Yes	Yes



Alpine View	4190	4183	6		0	110.6	4 VCP	GWWSB	Rainbow Dr	7/29/2019 0:00	No	No
Ridgeway /	4183	4182	6		0	195.7	4 VCP	GWWSB	Rainbow Dr	7/29/2019 0:00	Yes	No
Checked O Hypoint St	4225	4182	6		0	244.1	1 VCP	GWWSB	Rainbow Dr	6/13/2019 0:00	No	No
Checked O Sangster R	4228	4229	8	1960	0	350.1	4 VCP	GWWSB	Eura Brown	9/4/2019 0:00	No	No
Checked O Sangster R	4229	4230	8	1960	0	397.2	3 VCP	GWWSB	Eura Brown	9/4/2019 0:00	No	No
Checked O Sangster R	4230	4231	8	1960	0	400.1	3 VCP	GWWSB	Eura Brown	9/4/2019 0:00	No	No
Checked O Sangster R	4231	4126	8	1960	0	401.7	3 VCP	GWWSB	Eura Brown	9/5/2019 0:00	No	No
Manor St	0	0	8		0	481.2	3 VCP	GWWSB	Eura Brown	9/16/2019 0:00	Yes	No
Checked O Alcott Rd	4235	4145	8	Nov-55	0	419.0	4 Concrete	GWWSB	Rainbow Dr	9/16/2019 0:00	No	No
Bryant St	4236	4227	8		0	470.8	3 Concrete	GWWSB	Rainbow Dr	10/2/2018 0:00		
Line Block Emerson St	206	4237	8	Nov-54	0	292.1	3 Concrete	GWWSB	Rainbow Dr	10/3/2019 0:00	No	No
Intruding S Sangster R	0	207	6	Aug-52	0	224.9	3 VCP	GWWSB	Rainbow Dr	10/4/2019 0:00	No	No
Storm Drain Monterey HF3 04, Ra	4279	4268	8	1969	0	226.4	4 VCP	GWWSB	Eura Brown	8/19/2019 0:00	No	Yes
Checked O Monterey HF3 04, Ra	4269	4268	8	1969	0	334.0	4 VCP	GWWSB	Eura Brown	8/16/2019 0:00	Yes	No
Checked O Monterey HF3 04, Ra	4269	4267	8	1969	0	468.3	4 VCP	GWWSB	Eura Brown	8/19/2019 0:00	Yes	Yes
Checked O Monterey HF3 04, Ra	4270	4271	8	1969	0	359.2	4 VCP	GWWSB	Eura Brown	8/19/2019 0:00	No	No
Checked O Janelle Dr HF3 04, Ra	4272	4271	8	1969	0	349.1	4 VCP	GWWSB	Eura Brown	8/20/2019 0:00	No	No
Checked O Brookhave HF3 04, Ra	4274	4275	8	1969	0	387.1	4 VCP	GWWSB	Eura Brown	8/19/2019 0:00	No	No
Checked O Brookhave HF3 04, Ra	4273	4268	8	1969	0	299.3	4 VCP	GWWSB	Eura Brown	8/15/2019 0:00	Yes	No
VCP/PVC Brookhave HF3 04, Ra	4275	4272	8	1969	0	412.0	4 VCP	GWWSB	Eura Brown	8/19/2019 0:00	No	No
VCP/CIP Janelle Dr HF3 04, Ra	4271	4276	8	1969	0	346.6	3 VCP	GWWSB	Eura Brown	8/20/2019 0:00	No	No
Roots remi Lakeshore HF3 04, Ra	4278	4277	8	1969	0	218.4	3 VCP	GWWSB	Eura Brown	8/28/2019 0:00	Yes	No
Janelle Dr HF3 04, Ra	5161	4277	8	1969	0	145.7	3 VCP	GWWSB	Eura Brown	8/21/2019 0:00	No	No
COB - Line Cordell St HF3 04, Ra	4276	4127	8	1969	0	366.4	3 VCP	GWWSB	Eura Brown	8/28/2019 0:00	No	No
Hutchins A	4419	4420	8	1961	0	398.0	2 Concrete	GWWSB	N Gadsden B	12/11/2018 0:00		
Hutchins A	4420	1955	8	1961	0	449.9	3 Concrete	GWWSB	N Gadsden B	12/11/2018 0:00		
Insp aband Grant St	4444	4442	6		0	295.2	4 VCP	GWWSB	S 6th St	11/20/2019 0:00	Yes	No
Ewing Ave	934	935	8		0	151.9	VCP	GWWSB	S 6th St	3/8/2018 0:00		
	935	304	10	1924	0	131.9	VCP	GWWSB	S 6th St	3/8/2018 0:00		
N Albert R	4460	304	8		0	105.5	Cast Iron	GWWSB	S 6th St	3/13/2018 0:00		
	0	865	6	1924	0	551.4	2 VCP	Housing Authority	S 6th St	8/3/2018 0:00		
	0	32	10		0	161.2	2 VCP	Housing Authority	S 6th St	6/8/2018 0:00		
#####	4474	862	10		0	242.4	3 VCP	Housing Authority	S 6th St	10/25/2018 0:00		
	4473	4474	10		0	129.2	3 VCP	Housing Authority	S 6th St	10/25/2018 0:00		
	4475	4474	8		0	153.0	3 VCP	Housing Authority	S 6th St	10/1/2018 0:00		
	4476	4473	10	1924	0	102.9	4 VCP		S 6th St	10/24/2018 0:00		
	860	4476	10		0	151.7	2 DIP		S 6th St	10/24/2018 0:00		
Moragne A	13	14	15		0	11.5	2 VCP	GWWSB	S 6th St	6/8/2018 0:00		
	4491	696	8		0	102.6	2 HDPE	GWWSB	S 6th St	2/7/2019 0:00		
Damaged S Reynolds C	0	8058	6		0	102.8	5 VCP	GWWSB	S 6th St	1/2/2019 0:00	No	Yes
	4499	4498	8		0	80.5	VCP	GWWSB	S 6th St	3/13/2018 0:00		
	4498	4501	8		0	172.6	VCP	GWWSB	S 6th St	3/13/2018 0:00		
S 6th St	1033	536	8	2017	0	399.9	1 CIPP	GWWSB	S 6th St	2/22/2018 0:00	No	No
Checked O Ave F	0	784	6		0	77.0	Concrete	GWWSB	S 6th St	5/1/2018 0:00		
Checked O Ave F	0	784	6		0	94.1	Concrete	GWWSB	S 6th St	5/1/2018 0:00		
ABS / Intru Kyle Al	738	737	6	1924	0	320.3	VCP	GWWSB	S 6th St	5/11/2018 0:00		
Ave E	0	780	6		0	198.3	VCP	GWWSB	S 6th St	5/3/2018 0:00		
N 10th St	7026	815	8	1924	0	200.0	1 HDPE	GWWSB	S 6th St	2/27/2019 0:00		
N 9th St	8006	8007	6	1924	0	196.1	2 VCP	GWWSB	S 6th St	8/29/2018 0:00		
N 9th St	820	872	8	1924	0	359.0	3 VCP	GWWSB	S 6th St	8/31/2018 0:00		
ABS Wawonah	0	761	6	Sep-51	0	250.0	VCP	GWWSB	S 6th St	6/6/2018 0:00		
HOLE IN BC Hillier St	0	2376	6		0	127.1	4 Concrete	GWWSB	S 6th St	5/28/2019 0:00	No	No
Tuscaloosa	823	764	8	1916	0	316.6	VCP	GWWSB	S 6th St	6/6/2018 0:00		
Ashley Al	0	1081	6	1924	0	143.3	VCP	GWWSB	S 6th St	3/2/2018 0:00		

	Ashley Al	0	1081	6	1924	0	154.1	VCP	GWWSB		S 6th St	3/2/2018 0:00					
GCU	Chestnut S	504	503	8	2017	0	196.8	1 HDPE	GWWSB		S 6th St	10/1/2018 0:00	No	No			
	Chestnut S	653	654	8	2018	0	187.2	1 HDPE	GWWSB	6/1/2018 0:00	S 6th St	7/12/2018 0:00	Yes	No			
	Jupiter St	0	52	6	1924	0	324.1	VCP	GWWSB		S 6th St	3/6/2018 0:00					
ABS	S 11th St	5071	26	8	2006	0	564.0	HDPE	GWWSB	6/1/2006 0:00	Pipe Burst	S 6th St	3/13/2018 0:00				
	Henry St	7067	91	8	2017	0	275.8	1 HDPE	GWWSB		S 6th St	9/5/2018 0:00	No	No			
Checked O	Hickory St	1614	1620	18		0	404.7	2 VCP	GWWSB		Hickory St	10/2/2019 0:00	No	No			
Attalla Sew	Forrest Av	4621	4620	6	1951	0	579.3	4 VCP	Private		Bryant St	11/19/2019 0:00	Yes	No			
	Madison A	7033	335	8		0	559.7	1 HDPE	GWWSB	6/1/2016 0:00	Pipe Burst	Bryant St	3/19/2018 0:00				
Checked O	MASON Av	0	1557	6		0	150.0	5 Cast Iron	GWWSB		Bryant St	4/29/2019 0:00					
	Sansom Av	1479	1478	10		0	348.5	4 VCP			S 6th St	1/7/2020 0:00					
	Sansom Av	4642	1479	8		0	287.2	3 VCP	GWWSB		S 6th St	1/15/2019 0:00		Yes			
	Shahan Av	0	1413	6		0	258.4	3 VCP	GWWSB		S 6th St	7/8/2019 0:00	No	No			
	N 31st St	1481	1478	6		0	283.3	3 VCP	GWWSB		S 6th St	8/31/2018 0:00	Yes	Yes			
Intruding s		0	1481	6		0	185.2	2 VCP	GWWSB		S 6th St	8/31/2018 0:00					
		0	1481	6		0	195.1	2 VCP	GWWSB		S 6th St	8/31/2018 0:00	Yes	Yes			
	Mitchell Av	1348	1900	6		0	631.9	VCP	GWWSB		S 6th St	3/14/2018 0:00					
	Mitchell Av	4676	4677	6		0	229.9	VCP	GWWSB		S 6th St	3/14/2018 0:00					
	S 25th St	0	0	8		0	171.9	3 VCP	GWWSB		S 6th St	4/11/2019 0:00					
Encrusted	N 26th St	0	0	6		0	200.4	4 VCP	GWWSB		S 6th St	1/15/2019 0:00					
JC	N 22nd St	1602	1601	8		0	205.6	VCP	GWWSB		S 6th St	4/25/2018 0:00					
JC	White Ave	5092	4700	8		0	139.1	HDPE	GWWSB		S 6th St	4/25/2018 0:00					
JC	White Ave	4700	1601	8		0	181.1	VCP	GWWSB		S 6th St	4/25/2018 0:00					
	White Ave	1601	4702	8		0	102.6	VCP	GWWSB		S 6th St	4/27/2018 0:00					
	White Ave	4702	4701	8		0	57.9	VCP	GWWSB		S 6th St	4/27/2018 0:00					
	White Ave	4701	4703	8		0	77.3	VCP	GWWSB		S 6th St	4/27/2018 0:00					
		1311	1309	6	1924	0	410.8	VCP	GWWSB		S 6th St	3/1/2018 0:00					
		1310	4704	6	2006	0	258.0	HDPE	GWWSB	6/1/2006 0:00	Pipe Burst	S 6th St	3/1/2018 0:00				
DIA NOT VI	Norris Ave	362	330	15		0	494.9	3 VCP	GWWSB		S 6th St	9/19/2019 0:00	No	No			
COB - This	Norris Ave	362	330	15		0	494.9	3 VCP	GWWSB		S 6th St	9/19/2019 0:00	No	No			
	S 23rd St	4706	361	6		0	387.4	3 VCP	GWWSB		S 6th St	9/26/2019 0:00	No	No			
		0	0	6		0	250.8	3 VCP	GWWSB		S 6th St	4/12/2019 0:00					
Encrusted		4711	4710	10	1923	0	175.3	4 VCP	GWWSB		S 6th St	1/15/2019 0:00					
Intruding S	Shahan Av	0	1332	8		0	430.0	3 VCP	GWWSB		S 6th St	7/8/2019 0:00	No	No			
	S 11th St	1651	4739	8	2018	0	307.3	2 HDPE	GWWSB		Owens St	3/13/2019 0:00					
	S 11th St	4742	1651	8	2018	0	289.5	2 HDPE	GWWSB		Owens St	3/15/2019 0:00					
	S 11th St	4743	4742	8	2018	0	367.4	HDPE	GWWSB		Owens St	3/5/2018 0:00					
I&I at MH : Meighan B Black Creel		1777	1778	12	1966	0	177.9	3 Concrete	GWWSB		S 6th St	1/16/2019 0:00		Yes			
VCP/CIP		8018	1778	18		0	194.7	3 VCP	GWWSB		S 6th St	1/16/2019 0:00					
Creek Cros		0	4821	6		0	261.1	4 VCP	GWWSB		S 6th St	8/22/2019 0:00	Yes	No			
		4821	4822	6	Jun-85	0	204.1	4 HDPE	GWWSB	6/1/1985 0:00	Replaced	S 6th St	9/3/2019 0:00	No	Yes		
		4831	4821	8		0	314.5	1 VCP	GWWSB		S 6th St	9/5/2019 0:00	Yes	Yes			
		5321	1404	8	Jun-85	0	410.0	PVC	GWWSB	6/1/1985 0:00	Replaced	S 6th St	3/6/2018 0:00				
		0	1275	6	1923	0	391.1	3 VCP	GWWSB		S 6th St	5/14/2019 0:00	Yes	Yes			
		0	1275	6	1923	0	455.3	3 VCP	GWWSB		S 6th St	5/14/2019 0:00	Yes	Yes			
Checked O	Main St	4853	1822	8		0	362.5	Concrete	GWWSB		West River WWTP	3/5/2018 0:00					
Intruding S	Tallahassee	0	1607	8		0	400.0	4 Concrete	GWWSB		Hickory St	9/10/2019 0:00	No	No			
	Ira Gray Rd	4916	4936	8		0	268.5	2 VCP	GWWSB		Airport Rd	8/6/2018 0:00	Yes				
	Ira Gray Rd	4936	5122	8		0	261.4	2 VCP	GWWSB		Airport Rd	8/6/2018 0:00					
	Arcade St	15997	1219	4953	2410	8	2014	0	18.2	1 CIPP	GWWSB	6/1/2014 0:00	CIPP	East River WWTP	10/22/2018 0:00	No	No
		15997	1219	4952	4953	8	2014	0	136.2	1 HDPE	GWWSB	6/1/2014 0:00	Pipe Burst	East River WWTP	10/22/2018 0:00	No	No
	Roberts Cir	0	0	8	1978	0	170.1	3 PVC	GWWSB		East River WWTP	7/16/2019 0:00	No	No			
Checked O	Rose St	0	4983	8		0	325.1	4 Concrete	GWWSB		Green Pasture	8/7/2018 0:00					
Checked O	Rose St	0	264	8		0	47.7	3 Concrete	GWWSB		Green Pasture	4/9/2019 0:00		Yes			
Checked O	Rose St	0	0	8		0	261.4	3 Concrete	GWWSB		Green Pasture	4/9/2019 0:00					



Rose St	0	0	8	0	18.1	3 DIP	GWWSB	Green Pasture	4/9/2019 0:00				
Checked O Talmadge St	0	2717	8	0	215.3	2 Concrete	GWWSB	Green Pasture	6/27/2019 0:00	No	No		
Checked O Springfield	0	264	10	0	85.5	3 Concrete	GWWSB	Green Pasture	4/9/2019 0:00				
Springfield	0	0	10	0	36.1	3 DIP	GWWSB	Green Pasture	4/9/2019 0:00	No	No		
E Broad St	4991	3057	8	0	200.1	VCP	GWWSB	East River WWTP	2/27/2018 0:00				
Checked O Fuller St	0	2418	6	0	69.9	5 VCP	GWWSB	East River WWTP	7/9/2019 0:00	Yes	No		
Vinson Ave	8001	2497	6	0	150.2	VCP	GWWSB	East River WWTP	5/16/2018 0:00				
JC	5026	2770	8	0	35.6	PVC	GWWSB	East River WWTP	4/13/2018 0:00				
	3608	5042	8	0	99.6	4 VCP	GWWSB	Traylor Park	10/10/2018 0:00				
	5042	3610	8	0	293.2	4 VCP	GWWSB	Traylor Park	10/10/2018 0:00				
N 10th St	7025	797	8	1924	0	HDPE		6/1/2016 0:00 Pipe Burst	S 6th St	6/1/2018 0:00			
Argyle Cir	0	1016	6	0	70.6	4 VCP	Private	S 6th St	11/5/2018 0:00				
E Broad St	5052	3054	8	0	208.1	4 VCP	GWWSB	East River WWTP	3/28/2019 0:00		Yes		
Forrest Ave	5047	1285	10	2008	0	216.6	2 HDPE	6/1/2008 0:00 Pipe Burst	S 6th St	10/18/2018 0:00			
Harvard Av P-04078	5455	1996	8	Oct-09	0	166.6	PVC	6/1/2009 0:00 Replaced	N Gadsden A	2/11/2019 0:00			
Used To Be Waring Ave	1075	5162	1717	8	1969	0	420.7	VCP	GWWSB	Owens St	5/15/2018 0:00		
Bretwood I	0	2366	6	0	335.0	3 VCP	GWWSB	S 6th St	6/11/2018 0:00				
S 24th St	0	0	12	0	270.1	0 Concrete	GWWSB	S 6th St	3/8/2018 0:00				
N 2nd St	5174	1210	6	0	158.8	3 VCP	GWWSB	S 6th St	9/20/2018 0:00				
7th St N	0	5182	6	0	199.3	VCP	GWWSB	East River WWTP	3/6/2018 0:00				
California St	5200	5199	8	0	319.7	Concrete	GWWSB	Walnut St	3/13/2018 0:00				
California St	5199	5195	8	0	395.5	VCP	GWWSB	Walnut St	3/13/2018 0:00				
Intruding S Musca4ne HF3 03 Noi	0	2041	8	1958	0	149.9	5 Concrete	GWWSB	N Gadsden B	11/30/2018 0:00	Yes	No	
Intruding S Alpine View	0	4184	6	0	298.1	3 VCP	GWWSB	Rainbow Dr	7/30/2019 0:00	No	No		
Chadwick St HF3 03 Noi	5259	2219	8	1958	0	71.1	4 Concrete	GWWSB	N Gadsden B	12/6/2018 0:00			
Musca4ne HF3 03 Noi	2039	2223	8	1958	0	250.0	4 Concrete	GWWSB	N Gadsden B	12/3/2018 0:00	No	No	
Columbia / North Gad:	5262	2001	8	1958	0	103.1	5 Concrete	GWWSB	N Gadsden A	2/11/2019 0:00	Yes		
Checked O Dodd Rd	5282	3803	8	0	100.1	4 Concrete	GWWSB	East River WWTP	11/18/2019 0:00	No	No		
Checked O Dodd Rd	0	5282	8	0	181.0	5 Concrete	GWWSB	East River WWTP	11/18/2019 0:00	No	No		
Plugged	0	5283	8	0	160.0	5 Concrete	GWWSB	East River WWTP	11/13/2019 0:00	No	No		
Checked O Short Spru:	7032	492	8	0	293.7	3 HDPE	GWWSB	6/1/2016 0:00 Pipe Burst	S 6th St	8/20/2018 0:00			
Checked O Hillier St	0	757	6	0	298.2	3 VCP	GWWSB	S 6th St	5/29/2019 0:00	No	No		
N 5th St	1153	1204	8	1924	0	357.8	4 VCP	GWWSB	S 6th St	12/26/2018 0:00			
Grant Ave	5336	5335	10	1988	0	45.6	PVC	GWWSB	East River WWTP	3/16/2018 0:00			
Janelle Dr HF3 04, Ra	5356	4276	8	1969	0	220.6	4 VCP	GWWSB	Eura Brown	8/28/2019 0:00	Yes	No	
Sewer Mail	833	5361	5360	8	1980	0	75.0	2 PVC	GWWSB	S 6th St	11/8/2018 0:00		
Sewer Mail	833	5360	5362	8	1980	0	154.1	2 PVC	GWWSB	S 6th St	11/8/2018 0:00		
Sewer Mail	833	5362	776	8	1980	0	312.4	PVC	GWWSB	S 6th St	4/4/2018 0:00		
Glen Iris Dr	1017	0	2368	8	1984	0	100.0	1 PVC	GWWSB	S 6th St	6/17/2019 0:00	No	No
Mountaint	829	3472	3473	8	1969	0	325.7	5 VCP	GWWSB	S 6th St	4/2/2018 0:00	No	Yes
Tuscaloosa	875	5394	8	2017	0	235.2	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No	
Brookside I	3477	5415	8	0	481.0	VCP	GWWSB	S 6th St	2/27/2018 0:00				
Brookside I	5486	3476	8	0	137.6	VCP	GWWSB	S 6th St	2/27/2018 0:00				
Sewer Late	0	91	6	0	271.8	2 Concrete	GWWSB	S 6th St	6/20/2018 0:00				
Meighan B	0	0	12	0	37.4	3 VCP	GWWSB	S 6th St	1/16/2019 0:00				
S 5th St	1248	5442	8	2017	0	135.1	1 CIPP	GWWSB	S 6th St	2/22/2018 0:00	No	No	
S 5th St	7	5461	8	2017	0	235.9	1 CIPP	GWWSB	S 6th St	3/6/2018 0:00	No	No	
Harvard Av P-04078	5454	1995	8	Oct-09	0	269.8	1 PVC	6/1/2009 0:00 Replaced	N Gadsden A	2/12/2019 0:00			
	0	4475	8	0	175.3	3 VCP	Housing Authority	S 6th St	10/1/2018 0:00				
	1032	568	5460	8	2017	0	29.7	1 CIPP	GWWSB	S 6th St	2/22/2018 0:00	No	No
	1180	5489	8	1917	0	125.6	3 VCP	GWWSB	S 6th St	5/17/2019 0:00	No	No	
Checked O Mountaint	3470	3469	8	0	354.8	VCP	GWWSB	S 6th St	2/21/2018 0:00				
Needs Reh Duncan St	574	5488	6	1924	0	155.6	5 VCP	GWWSB	S 6th St	8/17/2018 0:00	Yes	No	
	1143	1142	8	0	85.7	3 VCP	GWWSB	S 6th St	7/2/2019 0:00	No	No		



Inspection Edgemont	2391	2393	6		0	104.2	HDPE	GWWSB	S 6th St	2/4/2019 0:00			
Inspection Abandoned (Too small Dia)	2393	322	6		0	311.2	HDPE	GWWSB	S 6th St	2/4/2019 0:00			
Chestnut S	6019	503	8	2017	0	355.2	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No	
Checked O Church St	7074	875	8	2017	0	178.3	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No	
Beach Ln	3029	2536	6		0	214.8	4 VCP	GWWSB	East River WWTP	11/20/2018 0:00			
S 3rd St	0	16	6	1916	0	291.9	3 VCP	GWWSB	S 6th St	6/3/2019 0:00	Yes	No	
7th St N	5182	3305	8		0	82.2	Concrete	GWWSB	East River WWTP	3/6/2018 0:00			
N 6th St	864	862	12		0	43.4	4 VCP	GWWSB	S 6th St	11/5/2018 0:00			
N 6th St	865	864	12		0	52.5	2 VCP	GWWSB	S 6th St	8/3/2018 0:00			
	7052	593	8	2017	0	202.2	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No	
Kyle St	7051	739	8	2017	0	329.9	1 HDPE	GWWSB	S 6th St	6/5/2018 0:00	No	No	
Kyle St	739	7069	8	2017	0	334.4	1 HDPE	GWWSB	S 6th St	2/22/2018 0:00	No	No	
S 11th St	7061	1005	8	2017	0	286.8	1 HDPE	GWWSB	S 6th St	6/19/2019 0:00	No	No	
90'	6037	4499	8		0	93.8	VCP	GWWSB		3/13/2018 0:00			
PVC/VCP N 10th St	797	768	8	1924	0	180.5	VCP	GWWSB	S 6th St	6/7/2018 0:00			
N 9th St	8007	820	6	1924	0	345.4	4 VCP	GWWSB	S 6th St	8/29/2018 0:00			
Ave A	768	802	10	1924	0	340.7	3 VCP	GWWSB	S 6th St	6/13/2018 0:00			
Checked O Harrison A	1675	1674	8		0	105.9	Concrete	GWWSB	Owens St	3/2/2018 0:00			
	8004	864	8	1924	0	88.1	2 VCP	Housing Authority	S 6th St	8/3/2018 0:00			
N 9th St	8005	8006	6	1924	0	195.6	2 VCP	GWWSB	S 6th St	8/29/2018 0:00			
	2350	865	6		0	247.9	0 VCP	GWWSB		7/30/2018 0:00			
Tuscaloosa	0	5324	6	1924	0	53.5	3 VCP	GWWSB	S 6th St	8/31/2018 0:00			
	8003	7092	8		0	192.4	2 VCP	Housing Authority		8/3/2018 0:00			
1st Ave	8009	1196	6	1924	0	108.2	3 VCP	GWWSB	S 6th St	9/20/2018 0:00			
	8010	8004	6		0	154.0	3 VCP	Housing Authority		10/26/2018 0:00			
	8012	8011	8		0	199.0	3 VCP	Housing Authority		10/26/2018 0:00			
	8011	862	8		0	252.0	3 VCP	Housing Authority		10/26/2018 0:00			
	4811	8018	18		0	41.2	3 Concrete	GWWSB	S 6th St	1/16/2019 0:00			
P-11035	998	4038	4039	12	2012	0	208.5	3 HDPE	GWWSB	Rainbow Dr	6/5/2019 0:00	No	No
Fountain S HF3 04, Cit	4113	4125	15	1960	0	250.8	3 VCP	GWWSB	Rainbow Dr	11/25/2019 0:00	No	No	
HF3 04, Cit	4120	4119	15	1960	0	296.2	3 Concrete	GWWSB	Rainbow Dr	9/9/2019 0:00	No	No	
HF3 04, Cit	4121	4120	15	1960	0	497.4	3 Concrete	GWWSB	Rainbow Dr	9/9/2019 0:00	No	No	
HF3 04, Cit	4122	4121	15	1960	0	403.9	3 Concrete	GWWSB	Rainbow Dr	9/9/2019 0:00	Yes	No	
Offset Join Riley Cir	4148	4146	6	Apr-54	0	300.0	4 VCP	GWWSB	Rainbow Dr	9/20/2019 0:00	No	No	
Offset Join Riley Cir	4147	4148	6	Apr-54	0	193.0	4 VCP	GWWSB	Rainbow Dr	9/20/2019 0:00	No	No	
Checked O Riley St	4146	4154	8		0	367.6	3 VCP	GWWSB	Rainbow Dr	10/7/2019 0:00	No	No	
Intruding S Riley St	4154	4155	8		0	303.9	3 VCP		Rainbow Dr	10/7/2019 0:00	No	No	
Riley St	4155	5294	8		0	470.8	3 VCP	GWWSB	Rainbow Dr	10/8/2019 0:00	No	No	
Intruding S Whittier St	4160	4161	6		0	64.3	3 VCP	GWWSB	Rainbow Dr	10/9/2019 0:00	No	No	
Sangster Rv	4161	208	8		0	248.8	3 VCP	GWWSB	Rainbow Dr	10/8/2019 0:00	No	No	
Hole in Pip Whittier St	4162	4160	6		0	247.1	3 VCP	GWWSB	Rainbow Dr	10/8/2019 0:00	Yes	No	
Varies from Whittier St	0	4162	6		0	302.0	3 VCP	GWWSB	Rainbow Dr	10/8/2019 0:00	No	No	
Intruding S Alcott Rd	0	4155	6		0	279.1	3 VCP	GWWSB	Rainbow Dr	10/8/2019 0:00	No	No	
Ridgeway /	4164	4163	8	2006	0	375.4	3 HDPE	GWWSB	6/1/2006 0:00 Pipe Burst	Rainbow Dr	10/14/2019 0:00	No	No
Ridgeway /	4165	4164	8	2006	0	339.2	3 HDPE	GWWSB	6/1/2006 0:00 Pipe Burst	Rainbow Dr	10/14/2019 0:00	No	No
Rocks Pres Arc 2	4166	4167	6		0	190.5	4 VCP	GWWSB	Rainbow Dr	10/28/2019 0:00	No	No	
Sunnydale	4167	4168	8		0	220.1	4 VCP	GWWSB	Rainbow Dr	1/16/2020 0:00	Yes	No	
Sunnydale	4168	4172	8		0	345.3	4 VCP	GWWSB	Rainbow Dr	1/16/2020 0:00	Yes	No	
Drop In cor Sunnydale	4172	4170	8		0	75.7	4 VCP	GWWSB	Rainbow Dr	1/16/2020 0:00	Yes	No	
Ridgeway /	4163	4251	8		0	350.1	4 VCP	GWWSB	Rainbow Dr	10/15/2019 0:00	No	No	
Intruding S Montvale /	0	0	6		0	165.0	3 VCP	GWWSB	Rainbow Dr	8/12/2019 0:00	No	No	
Forrestine	211	210	8	2006	0	390.0	3 HDPE	GWWSB	6/1/2006 0:00 Pipe Burst	Rainbow Dr	8/12/2019 0:00	No	No
VCP/Concr Alpine View	4175	4174	6	Jan-56	0	150.0	4 Concrete	GWWSB	Rainbow Dr	9/23/2019 0:00	No	No	
Intruding S Alpine View	4176	4175	6	Jan-56	0	151.0	3 VCP	GWWSB	Rainbow Dr	9/23/2019 0:00	No	No	

Rock in Pip Alpine View		0	4176	6	Jan-56	0	125.3	4 VCP	GWWSB		Rainbow Dr	9/23/2019 0:00	No	No	
Roots Pres: Sunnydale		4177	4167	8		0	274.6	1 VCP	GWWSB		Rainbow Dr	10/28/2019 0:00	Yes	No	
Blocked w/ Mountary		4178	4179	8		0	298.2	VCP	GWWSB		Rainbow Dr	10/15/2019 0:00	Yes	No	
Mountary		4179	4180	8		0	115.2	4 VCP	GWWSB		Rainbow Dr	10/15/2019 0:00	Yes	No	
Mountary		4180	4177	8		0	207.0	4 VCP	GWWSB		Rainbow Dr	10/28/2019 0:00	Yes	No	
Hypoint St		4181	4178	8		0	234.6	4 VCP	GWWSB		Rainbow Dr	10/15/2019 0:00	Yes	No	
Sunnydale		0	4177	8		0	220.5	4 VCP	GWWSB		Rainbow Dr	10/28/2019 0:00	Yes	No	
Checked O	P-11035	998	4186	4165	8	2012	0	196.4	3 PVC	GWWSB	6/1/2012 0:00 Misc Rehal	Rainbow Dr	10/14/2019 0:00	No	No
Intruding S Alpine View			4187	4198	6		0	200.1	2 VCP	GWWSB		Rainbow Dr	7/25/2019 0:00	Yes	Yes
Alpine View 15-100	775	0	4188	8	1999	0	122.2	3 PVC	GWWSB		Rainbow Dr	7/25/2019 0:00	No	No	
Top of Pipe Alpine View		4189	4187	6		0	215.7	4 VCP	GWWSB		Rainbow Dr	7/25/2019 0:00	Yes	Yes	
Alpine View 15-100	775	4188	4189	8	1999	0	34.6	3 PVC	GWWSB		Rainbow Dr	7/25/2019 0:00	No	No	
Alpine View		4195	4194	8		0	300.6	3 Concrete	GWWSB		Rainbow Dr	7/23/2019 0:00	No	No	
Alpine View		4196	4193	8		0	265.5	3 Concrete	GWWSB		Rainbow Dr	7/24/2019 0:00	No	No	
Pipe is 6' 2" Alpine View		0	4198	8		0	120.1	2 VCP	GWWSB		Rainbow Dr	7/24/2019 0:00	No	No	
Fairoaks Ci		4199	4200	8		0	222.8	2 Concrete	GWWSB		Rainbow Dr	9/10/2018 0:00	Yes		
		4192	4201	8		0	352.2	5 Concrete	GWWSB		Rainbow Dr	9/18/2018 0:00	Yes	Yes	
Blocked by Fairoaks Ci		4206	4204	8		0	69.5	3 Concrete	GWWSB		Rainbow Dr	9/17/2018 0:00			
Fairoaks St		4207	4191	8	2006	0	201.4	2 HDPE	GWWSB	6/1/2006 0:00 Pipe Burst	Rainbow Dr	7/25/2019 0:00			
Beechwood		4215	4194	8		0	270.5	3 Concrete	GWWSB		Rainbow Dr	7/23/2019 0:00	No	No	
Top of Pipe Alpine Pl		4219	4194	8	1966	0	131.9	3 VCP	GWWSB		Rainbow Dr	7/23/2019 0:00	No	No	
Street file : Alpine Pl		4218	4219	8	1966	0	177.4	3 VCP	GWWSB		Rainbow Dr	7/23/2019 0:00	No	No	
Memphis 1 Alpine Pl		4217	4218	8	1966	0	100.0	3 VCP			Rainbow Dr	7/23/2019 0:00	No	No	
Intruding S Alpine Pl		4216	4217	8	1966	0	91.3	3 VCP	GWWSB		Rainbow Dr	7/23/2019 0:00	No	No	
Hole in Pip Alpine View		4194	4220	8		0	340.2	4 Concrete	GWWSB		Rainbow Dr	7/23/2019 0:00	No	Yes	
Main is br c Alpine View		4220	4118	8		0	364.6	5 Concrete	GWWSB		Rainbow Dr	7/24/2019 0:00	No	Yes	
Intruding S		4221	4220	8		0	175.9	3 Concrete	GWWSB		Rainbow Dr	7/24/2019 0:00	No	No	
Ridgeway /		0	4226	8		0	335.1	3 VCP	GWWSB		Rainbow Dr	10/14/2019 0:00	Yes	No	
Ridgeway /		4226	4165	8		0	352.9	4 VCP	GWWSB		Rainbow Dr	10/14/2019 0:00	Yes	No	
Intruding S Arc 2		0	4166	6		0	90.4	4 VCP	GWWSB		Rainbow Dr	10/28/2019 0:00	No	No	
OFFSET JOI Sangster R		0	207	6	Aug-51	0	122.1	3 VCP	GWWSB		Rainbow Dr	7/16/2018 0:00			
Intruding S Forrester		210	4251	8		0	350.3	3 VCP	GWWSB		Rainbow Dr	10/9/2019 0:00	No	No	
		4262	4263	15		0	334.3	2 VCP	GWWSB		Rainbow Dr	11/22/2019 0:00	Yes	No	
Country Cl		3974	4291	8		0	169.7	3 VCP	GWWSB		Rainbow Dr	11/30/2018 0:00			
Rainbow D		4317	4318	8		0	297.5	3 PVC	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
Cover Up		4319	4318	8		0	53.9	VCP	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
Rainbow D	620	4321	4323	8	1980	0	60.4	3 PVC	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
Rainbow D	620	8105	8104	8	1980	0	107.0	3 PVC	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
		4336	4197	8		0	286.1	4 UNK	GWWSB		Rainbow Dr	9/7/2018 0:00			
Rainbow D	1035	4325	5403	8	1971	0	299.1	VCP	GWWSB		Rainbow Dr	3/5/2018 0:00			
Rainbow D	1035	4324	4325	8	1971	0	423.4	VCP	GWWSB		Rainbow Dr	3/5/2018 0:00			
Fairoaks Ci		4204	5104	8		0	165.4	2 Concrete	GWWSB		Rainbow Dr	9/17/2018 0:00			
Rainbow D	620	8106	4321	8	1980	0	104.0	3 PVC	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
Riley St		5294	208	8		0	128.8	3 VCP	GWWSB		Rainbow Dr	10/8/2019 0:00	No	No	
Rainbow D	1035	5403	4348	8	1971	0	289.4	VCP	GWWSB		Rainbow Dr	3/5/2018 0:00			
		0	2378	6		0	189.7	4 VCP				2/13/2019 0:00			
		8058	1030	6		0	71.4	4 VCP	GWWSB			1/2/2019 0:00		Yes	
		8060	8059	8		0	302.3	2 HDPE	GWWSB		S 6th St	4/15/2019 0:00	No	No	
Plainview S		8025	749	6	1924	0	32.0	3 VCP	GWWSB		S 6th St	5/23/2019 0:00	No	No	
S 25th St		0	8059	8		0	43.9	3 VCP	GWWSB		S 6th St	4/11/2019 0:00			
Rainbow D	620	4322	8105	8	1980	0	108.7	3 PVC	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
Rainbow D	620	5342	8106	8	1980	0	79.1	3 PVC	GWWSB		Rainbow Dr	8/13/2019 0:00	No	No	
Memphis Tee / VCP & CIP		4318	293	8		0	43.0	4 Cast Iron	GWWSB			8/13/2019 0:00	No	No	



Manhole Inspections 2017 - 2019																
Top	Invert Elev	Notes	Const Date	Plat_No_	Project_No	MH No	Inspection Date	Chimney	Condition	Depth	Rehab Yr	Material	Rehab Type	Located ?	Owner	Receiving_LS
0	0	Located by				5391	9/14/2018		Good	8.50		0 Brick	None	Yes	GWWSB	S 6th St
531	0					4	2/9/2018		Good	5.05		0 Brick	None	Yes	GWWSB	S 6th St
560.37	550.77					7	4/9/2018		Good	9.60		0 Brick	None	Yes		S 6th St
0	0					11	6/4/2019		Good	13.16		0 Brick	None			S 6th St
517.83	0	Proposed I				12	5/22/2018		Good	13.16		0 Precast Concrete	None			S 6th St
517.74	0					13	5/21/2018		Good	13.50		0 Brick	None			S 6th St
517.79	504.27					14	5/22/2018		Good	14.75		0 Precast Concrete	None			S 6th St
517.16	502.66					15	8/15/2018		Good	14.92		0 Precast Concrete	None			S 6th St
0	0					16	6/3/2019		Good	5.92		0 Precast Concrete	None			S 6th St
0	0					23	6/20/2018		Good	5.00		0 Brick	None			S 6th St
0	0					25	4/22/2019		Poor	7.00		0 Brick	None		GWWSB	S 6th St
0	0	Lateral in h				27	2/13/2019		Poor	4.33		0 Brick	None		GWWSB	S 6th St
0	0	Abandoned				28	5/21/2018		Fair	9.08		0 Brick	None			S 6th St
547.46	543.46					29	7/19/2018		Good	4.16		0 Brick	None			S 6th St
0	0					30	9/13/2018		Good	7.25		0 Brick	None	Yes	GWWSB	S 6th St
0	0	Bad invert				31	7/12/2018		Poor	5.83		0 Brick	None			S 6th St
517.34	0					32	5/31/2018		Good	3.83		0 Brick	None	Yes	GWWSB	S 6th St
0	0					34	9/21/2018		Good	4.66		0 Brick	None	Yes	GWWSB	S 6th St
0	0					35	9/21/2018		Good	5.16		0 Brick	None	Yes	GWWSB	S 6th St
0	570.48		1958			42	4/2/2019		Good	5.83		0 Brick	None			N Gadsden B
531.02	523.92					45	2/11/2019		Good	7.00		0 Brick	None	No	GWWSB	N Gadsden A
552.1	548.17		2006			57	9/10/2019		Good	3.92	2,006	Brick	Replaced			S 6th St
573.44	0					69	7/17/2018		Good	6.00		0 Brick	Cement Liner	Yes	GWWSB	S 6th St
0	0					72	8/20/2018		Fair	10.00		0 Brick	None			S 6th St
0	0					74	7/22/2019		Good	4.75		0 Brick	None			S 6th St
0	0					75	7/22/2019		Good	4.33		0 Brick	None			S 6th St
0	0					76	7/22/2019		Good	7.16		0 Brick	None			S 6th St
0	0					77	7/22/2019		Good	5.08		0 Brick	None			S 6th St
0	0					78	7/22/2019		Good	5.75		0 Brick	None			S 6th St
0	0					85	6/11/2019		Good	6.33		0 Brick	None			S 6th St
558.01	552.71					86	6/11/2019		Good	5.30		0 Brick	None			S 6th St
0	0					87	6/11/2019		Good	7.50		0 Brick	None			S 6th St
0	0					88	6/14/2019		Good	5.16		0 Brick	None			S 6th St
579.44	573.34					89	3/15/2019		Fair	6.25		0 Brick	None	Yes	GWWSB	S 6th St
575.44	568.02				Shown on Plan I	90	6/15/2018		Good	7.42		0 Brick	None	Yes	GWWSB	S 6th St
551.59	547.01					91	6/20/2018		Good	4.75		0 Brick	None			S 6th St
539.6	531.58					105	10/16/2019		Good	8.16		0 Brick	None			East River WWTP
525.91	511.81					135	5/22/2018		Excellent	14.10		0 Precast Concrete	None		GWWSB	Rainbow City
0	0					206	8/27/2019		Good	5.41		0 Brick	None			Rainbow Drive
0	0	Bad invert.				207	7/16/2018		Good	4.92		0 Brick	None			Rainbow Drive
0	0					208	7/16/2018		Good	5.42		0 Brick	None			Rainbow Drive
0	0					209	7/29/2019		Good	9.50		0 Brick	None			Rainbow Drive
0	0					210	7/29/2019		Good	6.13		0 Brick	None			Rainbow Drive
0	0					211	7/29/2019		Good	7.42		0 Brick	None			Rainbow Drive
0	0					221	4/25/2019		Good	12.25		0 Precast Concrete	None		GWWSB	S 6th St
0	0					222	4/25/2019		Good	0.00		0 Precast Concrete	None	No	GWWSB	S 6th St
0	0					223	4/25/2019		Good	7.75		0 Precast Concrete	None			S 6th St
0	0					224	4/25/2019		Good	6.16		0 Precast Concrete	None			S 6th St
0	0					232	1/14/2020		Fair	7.33		0 Brick	None			S 6th St
0	0	4" Lateral				235	1/31/2019		Unknown	11.66		0 Brick	None		GWWSB	East River WWTP
0	0					239	10/19/2018		Good	6.25		0 Brick	None	Yes	GWWSB	East River WWTP
610.6	602.7					243	7/16/2019		Good	8.50		0 Precast Concrete	None			East River WWTP
0	0					249	5/30/2018		Good	7.16		0 Precast Concrete	None			IS9/Hwy77



574	0	252	1/30/2018	Good	5.42	0 Brick	None	Yes	GWWSB	East River WWTP
0	0 This MH Nr	257	3/13/2019	Good	7.00	0 Brick	None	No	GWWSB	Green Pasture
0	0	258	3/13/2019	Good	6.10	0 Brick	None		GWWSB	Green Pasture
0	0	259	9/19/2019	Good	5.92	0 Brick	None			Green Pasture
0	0	264	4/4/2019	Fair	8.00	0 Brick	None			Green Pasture
527.12	514.12	266	5/30/2018	Good	13.00	0 Brick	None			Hood Ave
0	0	289	8/23/2018	Good	6.50	0 Precast Concrete	None			159/Hwy77
553.7	549.56	291	8/23/2018	Good	4.42	0 Precast Concrete	None			159/Hwy77
0	0	316	4/11/2018	Good	7.33	0 Brick	None			S 6th St
0	0 Roots Pres	320	1/25/2019	Fair	7.41	0 Brick	None	Yes	GWWSB	S 6th St
0	0 Roots Pres	322	1/25/2019	Fair	10.00	0 Brick	None		GWWSB	S 6th St
0	0	323	1/30/2019	Good	14.16	0 Brick	None	No	GWWSB	S 6th St
0	0	324	1/25/2019	Good	7.33	0 Brick	None		GWWSB	S 6th St
0	0	327	1/30/2019	Good	6.83	0 Brick	None		GWWSB	S 6th St
0	512.41	330	9/19/2019	Good	17.50	0 Precast Concrete	None			S 6th St
556.96	550.9 Top 545.6 l	336	2/22/2019	Good	6.15	0 Brick	None	Yes	GWWSB	Bryant St
549.2	543	355	3/15/2019	Good	6.05	0 Brick	None			Walnut St
552.8	546.68 545.5 Goin	356	4/29/2019	Fair	6.12	0 Brick	None			Bryant St
0	0	359	4/12/2019	Good	12.08	0 Brick	None	Yes	GWWSB	S 6th St
0	0	361	9/26/2019	Good	21.50	0 Brick	None			S 6th St
0	0	362	9/19/2019	Good	13.16	0 Brick	None			S 6th St
0	0	368	3/22/2019	Good	7.58	0 Brick	None			S 6th St
0	0	370	1/16/2020	Good	8.50	0 Brick	None			S 6th St
0	0	373	1/29/2019	Good	12.16	0 Brick	None	No	GWWSB	S 6th St
0	0	374	3/27/2019	Good	10.10	0 Brick	None			S 6th St
0	0 Infiltration	379	6/12/2019	Poor	7.83	0 Brick	None			S 6th St
0	0	380	9/5/2018	Good	5.08	0 Brick	None	Yes	GWWSB	S 6th St
0	0	381	9/5/2018	Good	7.33	0 Brick	None	Yes	GWWSB	S 6th St
0	514.28	390	9/12/2018	Good	8.66	0 Brick	None	Yes	GWWSB	Owens St
0	0	398	10/18/2019	Good	6.50	0 Brick	None			East River WWTP
0	0	399	10/18/2019	Good	8.08	0 Brick	None			East River WWTP
0	0	420	2/4/2019	Fair	9.50	0 Brick	None		GWWSB	S 6th St
0	0	421	2/4/2019	Good	3.92	0 Brick	None		GWWSB	S 6th St
537.74	531.74	438	12/5/2019	Good	6.00	0 Brick	None	Yes	GWWSB	S 6th St
0	0	440	11/20/2019	Good	5.00	0 Brick	None	No		S 6th St
0	0	442	1/15/2020	Fair	4.83	0 Brick	None			S 6th St
541.06	530.06 Sprayed 20 2013 Rehab	448	7/11/2019	Good	11.20	2,013 Brick	Epoxy Liner	Yes		S 6th St
532.28	523.98	477	8/13/2019	Good	8.30	0 Brick	None	No		S 6th St
0	0	493	5/7/2018	Poor	8.50	0 Brick	None			S 6th St
0	562.3	497	4/23/2018	Good	4.42	0 Brick	None	No		S 6th St
0	563.56	506	9/10/2019	Good	7.92	0 Brick	None	No		S 6th St
0	0	507	5/21/2019	Good	4.16	0 Brick	None	Yes		S 6th St
0	0	508	5/21/2019	Good	2.66	0 Brick	None	No		S 6th St
516.98	509.38	518	8/14/2018	Fair	7.33	0 Brick	None			S 6th St
514.26	497.66 Inv. north l	519	6/15/2018	Good	16.33	0 Precast Concrete	None			S 6th St
0	0	521	8/15/2018	Good	14.50	0 Precast Concrete	None	No		S 6th St
540	0	524	2/9/2018	Good	3.25	0 Brick	None	Yes	GWWSB	S 6th St
0	0	537	7/23/2018	Good	10.25	0 Brick	None	Yes	GWWSB	S 6th St
553.98	546.18 Added 2' tr	561	8/22/2018	Good	7.83	0 Brick	None	Yes	GWWSB	S 6th St
0	0	574	8/17/2018	Good	3.75	0 Brick	None	No		S 6th St
574.72	565.97	576	6/14/2018	Good	8.58	0 Brick	None	Yes	GWWSB	S 6th St
0	0	578	7/15/2019	Fair	9.00	0 Brick	None			S 6th St
0	0	579	6/14/2019	Good	5.66	0 Brick	None	No		S 6th St
0	555.92 Located by	580	6/11/2019	Good	6.00	0 Brick	None			S 6th St
0	0	581	6/11/2019	Good	6.83	0 Brick	None			S 6th St

0	0		582	6/11/2019	Good	5.66	0 Brick	None			S 6th St
562.2	0		583	12/12/2018	Poor	5.25	0 Brick	None	Yes	GWWSB	S 6th St
0	0		584	7/17/2019	Good	6.08	0 Brick	None			S 6th St
0	0		606	11/20/2019	Good	5.92	0 Brick	None	No		S 6th St
0	0		607	11/20/2019	Good	6.66	0 Brick	None	No		S 6th St
0	0		608	8/21/2018	Good	5.58	0 Brick	None	No		S 6th St
0	0		627	3/26/2019	Fair	10.50	0 Brick	None	No		S 6th St
0	0		632	4/15/2019	Good	3.30	0 Brick	None	No		S 6th St
0	0		639	3/26/2019	Fair	5.30	0 Brick	None	No		S 6th St
0	0		643	3/6/2019	Fair	8.00	0 Brick	None	Yes	GWWSB	S 6th St
0	0 These were	1962	644	3/8/2019	Good	12.40	0 Brick	None	Yes	GWWSB	S 6th St
0	0 These were	1962	645	3/8/2019	Fair	10.70	0 Brick	None	Yes	GWWSB	S 6th St
543.95	534.75 JBWT Proje		646	3/7/2019	Fair	9.20	0 Brick	None	Yes	GWWSB	S 6th St
541.59	535.24 JBWT Proje		647	3/7/2019	Fair	6.35	0 Brick	None	Yes	GWWSB	S 6th St
563.14	555.14 Inverts Fro		652	6/14/2018	Good	7.92	0 Brick	None			S 6th St
563.17	556.47		654	6/14/2018	Good	6.75	0 Brick	None			S 6th St
0	0		655	6/14/2018	Good	8.42	0 Brick	None			S 6th St
0	0		657	6/12/2019	Fair	3.79	0 Brick	None	No		S 6th St
0	0		663	7/12/2018	Good	5.08	0 Brick	None			S 6th St
0	0		666	3/7/2019	Good	5.45	0 Brick	None		GWWSB	S 6th St
0	0 Infiltration		668	3/6/2019	Fair	8.90	0 Brick	None	Yes	GWWSB	S 6th St
0	0 Direct Coni		676	7/23/2018	Good	11.42	0 Brick	None	Yes		S 6th St
0	0		679	7/17/2019	Good	9.83	0 Brick	None			S 6th St
0	0		680	12/27/2018	Fair	12.16	0 Brick	None	No	GWWSB	S 6th St
0	0		684	6/6/2019	Good	15.00	0 Brick	None			S 6th St
514.16	493.99 Top & Inve		693	3/12/2019	Good	20.17	0 Precast Concrete	None		GWWSB	S 6th St
513.15	496.15 Top & Inve		696	2/5/2019	Excellent	17.00	0 Precast Concrete	None		GWWSB	S 6th St
0	0		730	4/5/2018	Good	8.33	0 Brick	None			S 6th St
0	0		731	4/5/2018	Good	5.66	0 Brick	None	No		S 6th St
0	0		732	4/4/2018	Good	7.25	0 Brick	None			S 6th St
0	0		733	4/4/2018	Good	5.16	0 Brick	None			S 6th St
0	0		734	4/18/2018	Good	7.16	0 Brick	None			S 6th St
0	0		736	5/3/2018	Good	5.33	0 Brick	None			S 6th St
0	0		737	5/3/2018	Good	5.75	0 Brick	None			S 6th St
0	0 Gas Main I		738	5/11/2018	Good	6.92	0 Brick	None			S 6th St
569.48	562.06		739	6/5/2018	Good	5.75	0 Precast Concrete	None			S 6th St
621.72	616.89 4' 9" From		740	6/5/2018	Good	4.75	0 Brick	None			S 6th St
0	0		741	6/11/2018	Good	3.16	0 Brick	None			S 6th St
0	0		746	5/7/2019	Good	7.92	0 Brick	None	No		S 6th St
0	0		747	5/7/2019	Good	3.92	0 Brick	None	No		S 6th St
0	0		749	5/23/2019	Good	6.00	0 Precast Concrete	None		GWWSB	S 6th St
0	0		750	5/8/2019	Good	5.50	0 Brick	None			S 6th St
0	0		756	5/29/2019	Good	1.66	0 Brick	None	No		S 6th St
0	0		757	5/29/2019	Fair	5.83	0 Brick	None	No		S 6th St
0	0		758	6/11/2018	Good	6.25	0 Brick	None			S 6th St
0	0		761	6/6/2018	Good	4.58	0 Brick	None			S 6th St
0	0		762	6/6/2018	Good	3.83	0 Brick	None	No		S 6th St
0	0		763	6/6/2018	Good	3.33	0 Brick	None	No		S 6th St
0	0		764	6/6/2018	Fair	5.00	0 Brick	None			S 6th St
0	0		765	4/24/2018	Poor	7.08	0 Brick	None			S 6th St
0	0		766	4/19/2018	Good	2.50	0 Brick	None			S 6th St
0	0		767	4/23/2018	Good	4.50	0 Brick	None			S 6th St
0	0		768	5/14/2018	Good	10.75	0 Brick	None			S 6th St
0	0		769	4/5/2018	Good	5.92	0 Brick	None			S 6th St
0	0		770	4/13/2018	Good	5.42	0 Brick	None			S 6th St



0	0	771	4/16/2018	Good	7.20	0 Brick	None			S 6th St
0	0	772	4/19/2018	Good	7.92	0 Brick	None			S 6th St
0	0	773	4/30/2018	Good	6.18	0 Brick	None			S 6th St
0	0	774	4/18/2018	Good	6.33	0 Brick	None			S 6th St
0	0	775	4/18/2018	Good	9.00	0 Brick	None			S 6th St
0	0 Inveret Bac	776	4/4/2018	Fair	5.83	0 Brick	None			S 6th St
0	0	780	5/3/2018	Good	5.50	0 Brick	None			S 6th St
0	0	781	5/2/2018	Good	4.92	0 Brick	None			S 6th St
0	0	782	5/2/2018	Good	8.50	0 Brick	None			S 6th St
0	0	783	5/2/2018	Good	6.67	0 Brick	None			S 6th St
0	0 6' 2" E & V	784	5/1/2018	Poor	6.16	0 Brick	None			S 6th St
0	0	786	4/3/2018	Good	6.12	0 Brick	None	Yes	GWWSB	S 6th St
0	5.99	788	4/4/2018	Fair	6.33	0 Brick	None			S 6th St
535.3	529.5	796	4/13/2018	Good	6.66	0 Brick	None			S 6th St
551.7	545.55	797	6/7/2018	Good	5.92	0 Brick	None			S 6th St
0	0	798	5/25/2018	Good	4.66	0 Precast Concrete	None			S 6th St
0	0	799	5/25/2018	Good	3.92	0 Precast Concrete	None			S 6th St
0	0	800	5/25/2018	Good	5.00	0 Precast Concrete	None			S 6th St
0	0 Direct conr	801	5/25/2018	Good	4.58	0 Precast Concrete	None			S 6th St
0	0	802	4/20/2018	Good	5.66	0 Brick	None			S 6th St
0	0	803	4/17/2018	Good	9.16	0 Brick	None			S 6th St
0	0	805	4/17/2018	Good	5.75	0 Brick	None			S 6th St
549.6	0	806	5/1/2018	Good	6.16	0 Precast Concrete	None	Yes	GWWSB	S 6th St
543	0	807	4/20/2018	Good	4.92	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0	808	4/20/2018	Good	5.47	0 Brick	None			S 6th St
0	0	809	4/19/2018	Good	4.33	0 Brick	None	No		S 6th St
0	0	810	4/16/2018	Good	5.33	0 Brick	None			S 6th St
541.59	535.34	812	7/19/2018	Good	6.16	0 Brick	None	No		S 6th St
533.04	525.79	813	7/16/2018	Good	7.50	0 Brick	None			S 6th St
543.01	538.34	814	7/17/2018	Good	4.83	0 Brick	None			S 6th St
555.83	547.03	815	7/12/2018	Poor	8.50	0 Brick	None			S 6th St
0	0 direct conr	816	7/12/2018	Good	9.25	0 Brick	None			S 6th St
0	0	817	7/13/2018	Fair	7.16	0 Brick	None			S 6th St
559	0	818	8/17/2018	Fair	3.08	0 Brick	None	Yes	GWWSB	S 6th St
556.74	552.74	819	8/17/2018	Good	4.16	0 Brick	None	Yes	GWWSB	S 6th St
0	0	821	6/7/2018	Unknown	0.00	0 Brick	None			S 6th St
0	0	822	6/6/2018	Fair	4.16	0 Brick	None	No		S 6th St
0	0	841	3/8/2019	Good	9.60	0 Brick	None	Yes	GWWSB	S 6th St
0	0	842	7/17/2018	Good	4.92	0 Brick	None			S 6th St
0	0 2 Direct co	843	7/17/2018	Good	7.58	0 Brick	None	No		S 6th St
0	0	844	7/19/2018	Good	5.92	0 Brick	None			S 6th St
0	0	845	7/17/2018	Good	6.25	0 Brick	None			S 6th St
0	0	846	9/24/2018	Good	5.92	0 Brick	None	Yes	GWWSB	S 6th St
0	0	847	3/1/2018	Good	4.66	0 VC Juntion Box	None	Yes	GWWSB	S 6th St
526.87	519.98	848	9/25/2018	Fair	7.14	0 Brick	None			S 6th St
0	0	851	9/21/2018	Good	8.83	0 Brick	None	Yes		S 6th St
0	0	853	8/29/2018	Fair	4.92	0 Brick	None	No		S 6th St
0	0	855	10/1/2018	Fair	6.37	0 Brick	None	Yes	GWWSB	S 6th St
0	0	856	9/21/2018	Good	4.66	0 Brick	None	Yes	GWWSB	S 6th St
544.74	535.99	857	9/21/2018	Good	8.75	0 Brick	None	Yes	GWWSB	S 6th St
0	519.41	859	9/25/2018	Good	9.15	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	515.93	860	10/24/2018	Good	6.42	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	518.94	861	9/25/2018	Good	3.25	0 Precast Concrete	None	Yes	GWWSB	S 6th St
517.96	0	862	10/25/2018	Fair	5.00	0 Brick	None	Yes	GWWSB	S 6th St
0	0	864	8/3/2018	Fair	6.92	0 Brick	None			S 6th St



0	0			865	7/27/2018	Good	7.75	0 Brick	None			S 6th St
0	0			866	7/25/2018	Unknown	6.83	0 Brick	None			S 6th St
0	517.87			868	7/16/2018	Good	8.08	0 Precast Concrete	None	No		S 6th St
0	0			869	7/23/2018	Good	8.08	0 Precast Concrete	None			S 6th St
0	516.83			870	7/23/2018	Good	7.25	0 Brick	None	No		S 6th St
0	0			871	8/31/2018	Good	5.16	0 Brick	None			S 6th St
0	0			872	8/31/2018	Good	5.16	0 Brick	None		GWWSB	S 6th St
532.1	523.7	3.33' Chim	2014	876	12/2/2019 3.33'	Good	8.40	2,014 Brick	Epoxy Liner	Yes		S 6th St
0	0			882	12/2/2019	Good	8.16	0 Brick	None			S 6th St
0	0			883	12/2/2019	Good	8.92	0 Brick	None			S 6th St
0	0	Gas Line in		885	12/17/2018	Good	4.83	0 Brick	None	Yes	GWWSB	S 6th St
0	0			888	12/17/2018	Good	6.92	0 Brick	None	Yes	GWWSB	S 6th St
0	0			890	12/6/2018	Good	6.16	0 Brick	None		GWWSB	S 6th St
0	0	Main Drop		892	10/23/2019	Good	6.33	0 Brick	None			S 6th St
544.41	541.41			893	10/23/2019	Fair	3.00	0 Brick	None	Yes		S 6th St
546.56	544.14	19" Lid / 2		894	10/23/2019	Poor	2.42	0 Brick	None	Yes		S 6th St
0	0			903	10/24/2019	Good	4.16	0 Brick	None			S 6th St
0	0			904	10/23/2019	Good	4.66	0 Brick	None			S 6th St
0	525.02			910	3/14/2019	Good	9.20	0 Brick	None	Yes	GWWSB	S 6th St
0	523.24			911	3/14/2019	Fair	10.60	0 Brick	None	No		S 6th St
0	0	5'7" Drop		918	10/24/2019	Good	7.75	0 Brick	None			S 6th St
0	0			919	10/24/2019	Good	9.41	0 Brick	None	No		S 6th St
0	0			921	5/3/2018	Good	4.79	0 Precast Concrete	None			S 6th St
0	0			922	6/4/2018	Good	2.42	0 Brick	None			S 6th St
0	0			924	4/23/2018	Good	6.08	0 Brick	None	No		S 6th St
0	609.4			925	10/5/2018	Fair	7.58	0 Brick	None	Yes	GWWSB	S 6th St
0	0			926	10/9/2018	Fair	7.50	0 Brick	None	Yes	GWWSB	S 6th St
0	604.44			929	10/5/2018		8.25	0 Brick	None	Yes	GWWSB	S 6th St
0	605.55			930	10/9/2018	Fair	4.50	0 Brick	None	Yes	GWWSB	S 6th St
0	0	Lateral in A		939	2/19/2019	Good	5.60	0 Precast Concrete	None		GWWSB	S 6th St
0	0	Lateral in A		941	2/19/2019	Good	7.55	0 Precast Concrete	None	No	GWWSB	S 6th St
0	0			948	2/19/2019	Unknown	0.00	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0			949	2/19/2019	Good	11.20	0 Precast Concrete	None		GWWSB	S 6th St
0	0	Laterals in		950	2/19/2019	Good	9.50	0 Precast Concrete	None	No	GWWSB	S 6th St
0	0			951	2/19/2019	Good	10.12	0 Precast Concrete	None		GWWSB	S 6th St
0	556.68			975	8/16/2019	Good	8.33	0 Precast Concrete	None			S 6th St
0	557.93			976	8/16/2019	Good	9.08	0 Precast Concrete	None			S 6th St
0	555.91			1002	8/16/2019	Good	7.00	0 Precast Concrete	None	No		S 6th St
565.31	556.98			1005	6/19/2019	Good	8.50	0 Brick	None	Yes		S 6th St
552.07	538.12	Rehabed. S		1010	8/22/2018	Good	13.58	0 Brick	None	Yes	GWWSB	S 6th St
561.13	0	Located by		1011	2/27/2019	Fair	4.60	0 Brick	None	Yes	GWWSB	S 6th St
541.01	535.34			1036	12/5/2019	Good	5.67	0 Brick	None	Yes	GWWSB	S 6th St
521.03	515.28			1038	8/22/2018	Fair	5.75	0 Brick	None	Yes	GWWSB	S 6th St
517.06	509.66	Epoxy reha 2013 Rehab		1039	12/4/2019	Good	7.25	2,013 Brick	Epoxy Liner	Yes		S 6th St
0	494.28			1041	3/13/2019	Good	18.55	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	493.93			1042	3/13/2019	Good	18.70	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	493.68			1043	3/13/2019	Good	18.80	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	492.8			1044	3/13/2019	Good	19.70	0 Precast Concrete	None	Yes	GWWSB	S 6th St
512.72	493.33	Large Inver		1045	3/13/2019	Good	19.39	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0		2003	1060	10/15/2019	Good	10.42	0 Precast Concrete	None	No		159/Hwy77
0	0		726 JBWT 02046	1080	8/21/2018	Good	6.33	0 Brick	None	No		S 6th St
562	0			1081	2018	Good	5.25	0 Brick	None	Yes	GWWSB	S 6th St
555.8	548.1			1082	10/4/2018	Good	7.70	0 Brick	None	Yes		S 6th St
0	0	Infiltration		1094	3/6/2019	Fair	5.60	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1100	12/2/2019	Good	7.58	0 Brick	None			S 6th St

0	500.25			1110	10/18/2018	Good	23.42	0 Precast Concrete	None	Yes	GWWSB	S 6th St
512.696	496.41			1123	8/8/2019	Good	16.35	0 Precast Concrete	None			S 6th St
512	497.7 Small Inver			1125	3/13/2019	Fair	14.30	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0			1127	3/13/2019	Fair	18.72	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0			1141	5/3/2018	Fair	9.75	0 Brick	None			S 6th St
548.02	539.92			1142	7/1/2019	Good	6.16	0 Brick	None			S 6th St
0	0			1143	7/1/2019	Good	6.75	0 Brick	None			S 6th St
0	0			1145	7/17/2019	Good	5.33	0 Brick	None			S 6th St
0	0			1146	7/1/2019	Good	4.16	0 Brick	None	No		S 6th St
0	0			1147	7/1/2019	Good	7.83	0 Brick	None			S 6th St
553.27	545.57			1148	5/30/2018	Good	7.75	0 Brick	None	Yes		S 6th St
553.44	545.64			1153	12/26/2018	Poor	7.80	0 Brick	None	Yes	GWWSB	S 6th St
518.1	0			1168	2018	Good	12.50	0 Brick	None	Yes		S 6th St
522	0			1176	2018	Good	8.45	0 Precast Concrete	None	Yes		S 6th St
0	0			1188	6/5/2018	Good	8.25	0 Brick	None			S 6th St
0	0			1189	4/12/2019	Good	14.80	0 Brick	None			S 6th St
0	0			1190	7/18/2019	Good	9.42	0 Brick	None			S 6th St
0	0			1193	6/14/2019	Good	5.42	0 Brick	None			S 6th St
0	0			1195	6/11/2019	Good	6.58	0 Brick	None			S 6th St
564.14	0			1196	9/13/2018	Good	5.83	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1197	9/13/2018	Good	5.25	0 Brick	None	Yes	GWWSB	S 6th St
565.78	0			1198	9/13/2018	Good	4.33	0 Brick	None	Yes	GWWSB	S 6th St
566.75	0			1199	9/13/2018	Good	5.25	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1203	6/14/2019	Fair	3.83	0 Brick	None	No		S 6th St
0	0 Lateral in A			1204	12/27/2018	Poor	12.27	0 Brick	None	No	GWWSB	S 6th St
0	0			1207	7/1/2019	Good	6.42	0 Brick	None			S 6th St
0	0			1210	9/20/2018	Good	0.00	0 Brick	None	Yes	GWWSB	S 6th St
509.15	501.66	1963	West River Inter	1211	9/20/2018	Poor	12.75	0 Precast Concrete	None	Yes		S 6th St
0	0			1212	7/1/2019	Good	7.83	0 Brick	None			S 6th St
0	0			1229	6/5/2018	Good	6.83	0 Precast Concrete	None			S 6th St
0	0			1230	6/11/2019	Good	6.83	0 Brick	None			S 6th St
0	0			1239	6/6/2019	Good	9.33	0 Brick	None			S 6th St
0	0			1240	6/4/2019	Good	12.33	0 Brick	None			S 6th St
0	0 Recast 2001			1241	6/6/2019	Good	4.50	0 Brick	None			S 6th St
0	0			1249	6/4/2019	Good	7.42	0 Precast Concrete	None			S 6th St
0	0			1267	4/22/2019	Fair	5.00	0 Brick	None	No		S 6th St
0	0			1275	5/14/2019	Good	6.83	0 Brick	None		GWWSB	S 6th St
0	0			1277	5/14/2019	Good	5.83	0 Brick	None	No		S 6th St
542.81	0 Chimney Tr			1285	10/18/2018	Chimney Tr Fair	12.95	0 Brick	Epoxy Liner	Yes	GWWSB	S 6th St
544.29	527.84 Chimney Tr 2012 Rehab	783.03		1286	10/17/2018	Chimney Tr Fair	16.33	2,012 Brick	Epoxy Liner		GWWSB	S 6th St
0	0			1303	4/12/2019	Fair	8.58	0 Brick	None			S 6th St
544.02	538.12			1319	1/15/2019	Fair	5.90	0 Brick	None	Yes	GWWSB	S 6th St
0	545			1332	7/8/2019	Good	5.92	0 Brick	None	No		S 6th St
603.45	0 Surveyed b			1334	10/15/2018	Good	6.92	0 Brick	None	Yes	GWWSB	S 6th St
0	0 Lateral in A			1349	12/17/2018	Good	5.00	0 Precast Concrete	None		GWWSB	S 6th St
530.04	524.54			1350	3/4/2019	Fair	5.95	0 Brick	None	No	GWWSB	S 6th St
0	0			1352	4/3/2019	Good	9.05	0 Brick	None	No		S 6th St
0	0			1367	8/12/2019	Good	4.92	0 Brick	None	No		S 6th St
0	0			1369	10/17/2018	Good	5.83	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1373	1/29/2019	Good	5.66	0 Brick	None	No	GWWSB	S 6th St
540.3	532.9			1399	1/15/2019	Good	7.66	0 Brick	None		GWWSB	S 6th St
542.27	534.59 Lateral in A			1400	1/15/2019	Good	7.68	0 Brick	None		GWWSB	S 6th St
0	0 Invert neer			1403	1/15/2019	Good	7.25	0 Brick	None	No	GWWSB	S 6th St
555.27	544.75			1413	7/8/2019	Good	10.52	0 Brick	None			S 6th St
0	0 Bad Invert			1429	6/20/2019	Poor	4.16	0 Brick	None	No		S 6th St



0	0			1439	6/11/2019	Good	10.16	0 Brick	None	No		S 6th St
0	0			1440	5/2/2018	Good	6.08	0 Brick	None			S 6th St
0	0			1443	5/2/2018	Good	7.25	0 Brick	None			S 6th St
0	0			1446	4/18/2019	Fair	3.70	0 Brick	None			S 6th St
0	0			1455	6/11/2019	Good	7.08	0 Brick	None			S 6th St
0	0 Lateral in N			1479	1/15/2019	Fair	6.83	0 Brick	None	No	GWWSB	S 6th St
0	0			1481	8/31/2018	Good	7.66	0 Brick	None			S 6th St
547.5	542 Lateral in N			1499	12/19/2018	Good	5.50	0 Brick	None		GWWSB	Bryant St
537	523.67 Inv. N. Fror			1503	2/2/2018	Good	13.33	0 Brick	None	Yes	GWWSB	Bryant St
535.5	524.27 527.97 Nor			1531	2/2/2018	Fair	9.89	0 Brick	None	Yes	GWWSB	Bryant St
531.4	522.89 Inv. 523.67			1532	2/2/2018	Good	10.11	0 Brick	None	Yes	GWWSB	Bryant St
547.95	541.85	1219	15997	1533	3/15/2019	Fair	6.10	2,014 Brick	Epoxy Liner	Yes		Walnut St
539	0			1541	2/2/2018	Fair	9.33	0 Brick	None	Yes	GWWSB	Bryant St
0	0			1552	5/30/2018	Good	5.00	0 Brick	None			Woodland
0	0			1556	5/30/2018	Good	1.50	0 Brick	None	No		Woodland
550.48	546.38 Holding So			1558	2/22/2019	Fair	4.30	2,014	Epoxy Liner	Yes	GWWSB	Bryant St
0	0			1601	4/25/2018	Good	7.75	0 Brick	None	No		S 6th St
0	0			1602	4/25/2018	Fair	9.58	0 Brick	None	No		S 6th St
0	0 8' 7"			1606	9/10/2019	Good	8.33	0 Brick	None	No		Hickory St
0	0			1607	9/10/2019	Good	6.41	0 Brick	None			Hickory St
546.2	533.83 Roots			1617	5/30/2019	Fair	12.58	0 Brick	None			Hickory St
0	0 From Hartf			1618	5/30/2019	Good	5.16	0 Brick	None	No		Hickory St
0	515.6			1642	8/2/2018	Good	6.58	0 Brick	None			Owens St
549.95	538.54 Infiltration			1651	3/13/2019	Fair	11.10	0 Brick	None	Yes	GWWSB	Owens St
0	513.74			1666	4/5/2019	Good	0.00	0 Brick	None	No		Owens St
520.75	515.17			1671	6/26/2019	Good	5.58	0 Brick	None	No		Owens St
0	514.1			1677	8/2/2018	Good	10.33	0 Brick	None			Owens St
549.72	541.39			1711	5/2/2018	Good	8.33	0 Brick	None	No		West River WWTP
0	544.77			1717	5/15/2018	Unknown	10.42	0 Brick	None			Owens St
543.58	536.75			1718	4/3/2019	Good	6.83	2,016 Brick	Epoxy Liner		GWWSB	Hickory St
0	0			1719	4/3/2019	Fair	5.40	0 Brick	None			Hickory St
556.4	547.94			1745	2/14/2019	Good	8.46	0 Brick	None		GWWSB	Hickory St
0	0			1850	4/11/2018	Good	7.66	0 Brick	None			S 6th St
0	0			1857	1/14/2020	Good	7.42	0 Brick	None	No		S 6th St
570.61	564.11			1869	4/30/2018	Good	6.50	2,014 Strong Seal	Epoxy Liner	Yes	GWWSB	S 6th St
0	0			1879	4/25/2019	Good	0.00	0 Precast Concrete	None	No		S 6th St
0	0			1880	4/25/2019	Good	9.25	0 Precast Concrete	None	No		S 6th St
0	0			1889	4/22/2019	Fair	8.10	0 Brick	None			S 6th St
0	0			1890	3/22/2019	Good	5.33	0 Brick	None	Yes	GWWSB	S 6th St
529.21	523.56			1891	3/21/2019	Good	5.65	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1899	12/17/2018	Good	6.00	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1906	3/26/2019	Fair	8.50	0 Brick	None			S 6th St
596	0			1913	1/16/2020	Good	9.00	0 Brick	None	Yes	GWWSB	S 6th St
0	0			1920	3/26/2019	Good	4.42	0 Brick	None			S 6th St
573.22	568.62			1932	4/30/2018	Good	4.60	0 Brick	None	Yes	GWWSB	S 6th St
578.9	0 4 Laterals i			1934	2/1/2019	Fair	6.25	0 Brick	None	Yes	GWWSB	S 6th St
549.14	539.56	1958		1935	12/7/2018	Fair	9.58	0 Brick	Rehab Misc	Yes	GWWSB	N Gadsden B
0	543.5 5' 2" from	1958		1942	2/8/2019	Fair	6.58	0 Brick	None	No	GWWSB	N Gadsden B
0	544.97 Invert neec	1958		1947	7/10/2018	Fair	5.92	0 Brick	None			N Gadsden B
0	548.47 2 direct coi	1958		1948	7/10/2018	Good	5.33	0 Brick	None	No		N Gadsden B
0	538.71	1958		1952	12/7/2018	Fair	6.42	0 Brick	None	No	GWWSB	N Gadsden B
543.98	536.23 Top & Inve	1958	783.04 Shown on Plan F	1959	12/12/2018	Good	6.60	2,013 Brick	Epoxy Liner	Yes	GWWSB	Browning Circle
548.41	538.71 Memphis T	1958	Shown on Plan F	1960	12/12/2018	Good	9.50	0 Brick	None	Yes	GWWSB	Browning Circle
545.18	541.78	1958	783.04	1962	12/12/2018	Good	7.33	2,013 GCU Epoxy	Epoxy Liner	Yes	GWWSB	Browning Circle
0	0			1968	5/30/2018	Good	7.25	0 Brick	None	No		Browning Circle



0	0			1980	5/31/2018	Good	11.00	0 Brick	None			N Gadsden A
538.84	531.87	2009	P-04078	1995	2/11/2019	Good	7.33	2,009 Precast Concrete	Replaced		GWWSB	N Gadsden A
536.58	526.55	2009	P-04078	1996	2/11/2019	Excellent	8.92	2,009 Precast Concrete	Replaced	Yes	GWWSB	N Gadsden A
0	0			2001	2/11/2019	Fair	9.83	0 Brick	None	No	GWWSB	N Gadsden A
533.46	527.26		Shown on RFC-7	2003	2/20/2019	Fair	6.80	0 Brick	None		GWWSB	N Gadsden A
546.89	540.68 Infiltration			2004	2/15/2019	Poor	6.41	0 Brick	None	Yes	GWWSB	N Gadsden A
550.46	543.26 38" Chimr			2005	12/27/2018 3.17'	Fair	7.20	0 Brick	None	Yes	GWWSB	N Gadsden A
557.97	551.9 Brick Invert			2008	12/28/2018	Fair	7.66	0 Brick	None	Yes	GWWSB	N Gadsden A
532.19	520.49 Invert From			2018	6/20/2018	Fair	11.75	0 Brick	None			N Gadsden B
527.11	518.86 Top & Inve			2019	6/20/2018	Good	8.08	0 Brick	None	No		N Gadsden B
520.08	512.72 / RFC-11		Shown on Plan F	2021	5/29/2018	Good	7.36	0 Brick	None			N Gadsden B
519.43	510.53 Brick Spray 2013 Rehab			2033	5/29/2018	Good	8.92	2,013 Brick	Epoxy Liner			N Gadsden B
518.51	511.61 Top & Inve 2013 Rehab			2034	5/29/2018	Good	6.92	2,013 Brick	Epoxy Liner			N Gadsden B
0	522.32 HF2-11, Hu			2039	11/30/2018	Good	5.00	0 Brick	None			N Gadsden B
0	525.97			2041	11/30/2018	Good	5.30	0 Brick	None	No	GWWSB	N Gadsden B
0	0			2042	12/3/2018	Good	8.66	0 Brick	None	No	GWWSB	N Gadsden B
0	0 4" Riser n			2043	5/31/2018	Good	10.66	0 Brick	None	No		N Gadsden B
0	0			2054	2/11/2019	Fair	5.50	0 Brick	None		GWWSB	N Gadsden A
0	523.55			2060	2/20/2019	Good	5.90	0 Brick	None		GWWSB	N Gadsden A
0	0			2067	5/31/2018	Good	6.75	0 Brick	None	No		N Gadsden A
0	0			2068	5/31/2018	Good	14.33	0 Brick	None	No		N Gadsden A
577.96	572.13		1219 RFC-17, P-11035	2080	5/31/2019	Good	5.83	0 Brick	None			N Gadsden A
580.11	0			2081	5/31/2019	Good	4.46	0 Precast Concrete	None			N Gadsden A
584.25	571.26		1219 RFC-17, P-11035	2082	5/31/2019	Good	12.99	0 Brick	None			N Gadsden A
564.9	559.6			2084	2/8/2019	Good	5.25	0 Brick	None	No	GWWSB	N Gadsden A
581.84	569.64			2106	12/7/2018	Fair	12.20	0 Brick	None	Yes	GWWSB	Browning Circle
578.76	570.86			2108	12/7/2018	2.83 Fair	7.90	0 Brick	None	Yes	GWWSB	Browning Circle
0	540.79	1958		2119	12/7/2018	Fair	6.25	0 Brick	None	No	GWWSB	N Gadsden B
0	0	1958		2138	2/8/2019	Fair	6.42	0 Brick	None		GWWSB	N Gadsden B
0	553.48 5'9" from	1958		2141	2/7/2019	Fair	5.66	0 Brick	None		GWWSB	N Gadsden B
0	556.96	1958		2142	2/7/2019	Fair	6.00	0 Brick	None	No	GWWSB	N Gadsden B
0	569.47 4' 0" Dubl	1958		2153	4/2/2019	Good	5.41	0 Brick	None			N Gadsden B
0	0			2163	2/8/2019	Good	6.16	0 Brick	None	No	GWWSB	N Gadsden A
0	0			2164	2/8/2019	Fair	9.25	0 Brick	None	No	GWWSB	N Gadsden A
558.09	552.59	2012	783.04 RFC-17, P-11035	2165	12/12/2018	Good	5.83	2,013 GCU Epoxy	Epoxy Liner		GWWSB	N Gadsden A
553.63	0 Lateral in A	1958	783.04 Shown on Plan F	2170	12/12/2018	Good	11.92	2,013 GCU Epoxy	Epoxy Liner	No	GWWSB	Browning Circle
545.05	0	1958	783.04 Shown on Plan F	2172	12/12/2018	Good	4.75	2,013 GCU Epoxy	Epoxy Liner		GWWSB	Browning Circle
549.55	538.56			2179	2/15/2019	Fair	10.99	0 Brick	None	Yes	GWWSB	N Gadsden A
0	0		Shown On HF2-C	2180	2/15/2019	Poor	6.10	0 Brick	None	No	GWWSB	N Gadsden A
527.56	0 Top From J			2204	5/29/2018	Good	20.66	0 Brick	None			N Gadsden B
522.7	512.52			2205	12/6/2018	Fair	11.50	0 Brick	None		GWWSB	N Gadsden B
525.29	508.79 Rehabed. 1 2013 Rehab			2207	5/29/2018	Good	16.42	2,013 Brick	Epoxy Liner			N Gadsden B
0	0			2210	5/29/2018	Good	6.92	0 Brick	None	No		N Gadsden B
0	0			2211	5/9/2019	Fair	5.33	0 Brick	None	No		N Gadsden B
0	0			2219	12/6/2018	Good	8.00	0 Brick	None	No	GWWSB	N Gadsden B
0	0			2220	12/5/2018	Fair	7.08	0 Brick	None	No	GWWSB	N Gadsden B
0	515.24 HF2-11, Hu			2221	12/3/2018	Good	5.60	0 Brick	None		GWWSB	N Gadsden B
0	0			2222	12/3/2018	Good	5.50	0 Brick	None	No	GWWSB	N Gadsden B
0	519.67			2223	12/3/2018	Good	5.00	0 Brick	None	No	GWWSB	N Gadsden B
525.87	517.42 Rehabed. C 2012 Rehab		783.03 Shown on Plan F	2239	5/30/2018	Excellent	8.75	2,012 Brick	Epoxy Liner	Yes		N Gadsden B
0	0			2249	5/29/2018	Good	6.83	0 Brick	None			N Gadsden B
0	0			2250	5/29/2018	Good	7.66	0 Brick	None	No		N Gadsden B
513.97	505.75 Shown on I	1958	Shown on Plan F	2253	3/12/2019	Good	10.90	2,013 Brick	Cement Liner	Yes	GWWSB	N Gadsden B
0	0			2255	5/29/2018	Good	6.00	0 Brick	None	No		N Gadsden B
600.25	584.45 Ring Crack			2264	4/27/2018	Good	15.80	0 Precast Concrete	None	Yes	GWWSB	Browning Circle

0	0				2266	4/27/2018	Good	8.25	0 Precast Concrete	None	No		Browning Circle
0	0				2267	4/27/2018	Good	7.42	0 Precast Concrete	None	No		Browning Circle
0	0				2272	8/30/2018	Good	6.00	0 Precast Concrete	None	No		Browning Circle
0	0				2289	5/8/2018	Good	11.50	0 Brick	None	No		N Gadsden A
0	0				2320	5/8/2018	Good	7.70	0 Brick	None			N Gadsden A
0	0				2331	9/25/2018	Good	6.33	0 Brick	None	Yes	GWWSB	S 6th St
529	0				2341	2018	Fair	5.25	0 Brick	None	Yes	GWWSB	S 6th St
518.4	0				2343	2018	Good	7.00	0 Precast Concrete	None	Yes		S 6th St
516.8	0				2344	2018	Good	7.75	0 Precast Concrete	None	Yes		S 6th St
0	521.49 Drop				2348	9/26/2018	Poor	9.25	0 Brick	None	Yes	GWWSB	S 6th St
0	517.78 Drop				2349	7/30/2018	Good	5.33	0 Precast Concrete	None	No		S 6th St
0	517.7				2350	7/30/2018	Good	3.42	0 Brick	None			S 6th St
0	0				2352	9/28/2018	Fair	5.25	0 Brick	None	Yes	GWWSB	S 6th St
0	0 Direct Coni				2353	8/6/2018	Good	6.92	0 Brick	None			S 6th St
0	0				2355	7/25/2018	Good	6.92	0 Brick	None			S 6th St
0	0				2357	7/25/2018	Good	5.00	0 Brick	None			S 6th St
0	0				2359	8/6/2018	Good	6.33	0 Brick	None			S 6th St
0	0				2363	6/17/2019	Good	5.08	0 Brick	None			S 6th St
0	0				2366	6/11/2018	Good	3.83	0 Brick	None			S 6th St
0	0				2368	6/17/2019	Good	14.83	0 Brick	None			S 6th St
0	0				2369	5/29/2019	Good	4.92	0 Brick	None			S 6th St
0	0				2371	6/11/2018	Good	5.16	0 Brick	None	No		S 6th St
563.82	557.31				2375	5/29/2019	Good	6.51	0 Brick	None			S 6th St
0	0				2376	5/28/2019	Fair	6.16	0 Brick	None		GWWSB	S 6th St
0	0				2377	2/13/2019	Fair	5.66	0 Brick	None		GWWSB	S 6th St
0	0				2378	2/13/2019	Fair	5.66	0 Brick	None	Yes	GWWSB	S 6th St
554.1	0				2380	5/29/2019	Good	9.16	0 Brick	None			S 6th St
0	0				2382	5/8/2019	Good	6.08	0 Brick	None	Yes	GWWSB	S 6th St
0	0				2383	5/23/2019	Good	7.16	0 Brick	None	No		S 6th St
0	0				2384	2/13/2019	Good	6.16	0 Brick	None		GWWSB	S 6th St
0	576.55 Raised MH				2386	2/13/2019	Good	3.16	0 Brick	None		GWWSB	S 6th St
571.54	567.28 Lateral in N				2387	2/13/2019	Fair	4.33	0 Brick	None	No	GWWSB	S 6th St
0	0 Lateral in N				2390	1/25/2019	Good	6.33	0 Brick	None	No	GWWSB	S 6th St
584.9	577.1				2391	1/29/2019	Fair	7.80	2,016 Brick	Epoxy Liner		GWWSB	S 6th St
0	0				2403	1/25/2019	Good	3.58	0 Brick	None	Yes	GWWSB	S 6th St
0	0				2409	4/2/2019	Fair	6.60	0 Brick	None	No		S 6th St
591.07	576.22 Invert Fron		1219	15997	2410	10/22/2018	Fair	14.70	2,014 Strong Seal	Epoxy Liner	Yes	GWWSB	East River WWTP
591.6	575.97	2014	1219	15997	2411	10/22/2018	Good	15.63	2,014 Strong Seal	Epoxy Liner	Yes		East River WWTP
0	0 7' 7" Fron				2418	7/9/2019	Fair	4.50	0 Brick	None	No		East River WWTP
0	0				2419	7/9/2019	Good	6.50	0 Brick	None			East River WWTP
563.3	0				2433	5/21/2018	Good	4.58	0 Brick	None			East River WWTP
0	0				2447	5/21/2019	Good	7.83	0 Brick	None	Yes	GWWSB	East River WWTP
0	0				2452	1/2/2020	Fair	4.00	0 Brick	None	No		East River WWTP
0	0				2453	1/6/2020	Fair	3.83	0 Brick	None	No		East River WWTP
552.5	546.13				2456	1/24/2019	Good	6.40	0 Brick	None		GWWSB	East River WWTP
0	0				2458	10/29/2019	Good	4.66	0 Brick	None	No		East River WWTP
0	0				2468	7/9/2019	Good	6.00	0 Brick	None	No		East River WWTP
0	0				2473	2/4/2019	Good	7.16	0 Brick	None	No	GWWSB	East River WWTP
0	0				2474	2/4/2019	Good	9.75	0 Brick	None		GWWSB	East River WWTP
551.7	0				2486	2018	Good	4.90	0 Brick	None	Yes	GWWSB	East River WWTP
567	0				2490	10/16/2019	Good	4.33	0 Brick	None	Yes	GWWSB	East River WWTP
555	0				2491	10/18/2019	Good	8.92	0 Brick	None	Yes	GWWSB	East River WWTP
556	0				2492	10/18/2019	Good	12.16	0 Brick	None	Yes	GWWSB	East River WWTP
0	0				2495	10/16/2019	Good	5.50	0 Brick	None	Yes	GWWSB	East River WWTP
0	0				2497	5/16/2018	Good	5.08	0 Brick	None	Yes	GWWSB	East River WWTP



0	0	2498	10/18/2019	Good	6.00	0 Brick	None	Yes	GWWSB	East River WWTP
548.6	0	2510	2018	Good	6.84	0 Brick	None	Yes	GWWSB	East River WWTP
0	0	2511	2018	Unknown	0.00	0	None	No		East River WWTP
0	0	2519	4/5/2018	Good	5.08	0 Brick	None	No		East River WWTP
0	0	2546	10/19/2018	Good	4.50	0 Brick	None	Yes	GWWSB	East River WWTP
0	0	2557	5/16/2018	Good	3.33	0 Brick	None			East River WWTP
0	0	2558	5/16/2018	Good	5.00	0 Brick	None	No		East River WWTP
0	0	2560	5/16/2018	Good	6.00	0 Brick	None	No		East River WWTP
595	0	2563	2/12/2018	Good	14.08	0 Precast Concrete	None	Yes	GWWSB	East River WWTP
560.54	554.44	2567	10/19/2018	Good	6.58	0 Brick	None	Yes	GWWSB	East River WWTP
0	0	2571	8/5/2019	Fair	4.42	0 Brick	None			East River WWTP
0	0	2574	5/10/2018	Good	6.00	0 Brick	None			East River WWTP
0	0	2580	10/1/2018	Good	6.16	0 Brick	None	Yes	GWWSB	East River WWTP
0	0	2584	10/1/2018	Good	5.16	0 Brick	None	Yes	GWWSB	East River WWTP
612.74	605	2592	11/5/2019	Good	7.58	0 Precast Concrete	None			East River WWTP
611.16	605	2593	7/16/2019	Good	6.58	0 Precast Concrete	None			East River WWTP
601.15	592.7	2595	7/16/2019	Good	8.66	0 Precast Concrete	None			East River WWTP
0	0	2599	2/14/2019	Good	5.00	0 Brick	None		GWWSB	East River WWTP
0	0	2600	2/14/2019	Fair	6.83	0 Brick	None	No	GWWSB	East River WWTP
0	0	2610	6/8/2018	Good	4.83	0 Brick	None	No		East River WWTP
0	0	2624	4/12/2019	Good	4.60	0 Brick	None	No		East River WWTP
0	0	2628	10/22/2019	Good	8.25	0 Brick	None			East River WWTP
522.41	513.8	2629	10/22/2019	Good	8.66	0 Brick	None			East River WWTP
0	0	2630	10/22/2019	Good	4.58	0 Brick	None	No		East River WWTP
0	0	2652	10/11/2018	Good	6.16	0 Brick	None	Yes	GWWSB	East River WWTP
0	0	2654	10/11/2018	Good	5.66	0 Brick	None	Yes	GWWSB	East River WWTP
528.26	522.14	2655	10/1/2018	Fair	6.00	0 Brick	None	Yes	GWWSB	East River WWTP
0	0	2659	5/17/2019	Good	9.75	0 Brick	None			East River WWTP
0	0	2663	8/13/2018	Good	6.00	0 Brick	None	No		East River WWTP
0	0	2664	8/13/2018	Good	6.75	0 Brick	None			East River WWTP
593.89	580.6	2666	1/21/2020	Good	13.20	2,016 Precast Concrete	Epoxy Liner			East River WWTP
0	608.5 608 From f	2667	1/21/2020	Good	7.33	0 Precast Concrete	None	No		East River WWTP
0	593.5	2669	1/21/2020	Good	6.00	0 Precast Concrete	None			East River WWTP
0	586.84 Invert Fron	2670	1/21/2020	Good	6.75	0 Precast Concrete	None			East River WWTP
0	603.5	2671	1/21/2020	Good	4.66	0 Precast Concrete	None	No		East River WWTP
0	0 Memphis T	2672	1/22/2019	Fair	11.08	0 Brick	None	No	GWWSB	East River WWTP
0	0	2690	9/18/2019	Good	14.50	0 Brick	None			Green Pasture
0	0	2693	6/7/2019	Good	12.30	0 Brick	None			Green Pasture
0	0 Intruding S	2694	6/7/2019	Fair	11.83	0 Brick	None			Green Pasture
0	0	2696	4/9/2019	Good	8.10	0 Brick	None	No	GWWSB	Green Pasture
0	0 Lateral in h	2697	1/2/2019	Fair	9.58	0 Brick	None		GWWSB	Green Pasture
0	0	2698	9/19/2019	Fair	6.66	0 Brick	None	No		Green Pasture
0	0	2700	11/25/2019	Good	11.08	0 Brick	None			Green Pasture
0	0	2706	9/18/2019	Good	9.92	0 Brick	None			Green Pasture
520	509.88 Rehabbed, 2013 Rehab	2707	5/29/2018	Good	10.33	2,013 Brick	Epoxy Liner			N Gadsden B
557.77	0 Infiltration	2709	9/18/2019	Fair	13.00	0 Brick	None			Green Pasture
0	0	2710	9/18/2019	Good	14.42	0 Brick	None			Green Pasture
0	0	2712	9/19/2019	Good	10.42	0 Brick	None			Green Pasture
0	0	2713	9/19/2019	Good	7.90	0 Brick	None		GWWSB	Green Pasture
553.23	0	2714	1/2/2019	Fair	10.42	0 Brick	None	No	GWWSB	Green Pasture
0	0 Shot With i	2716	2/25/2019	Good	6.60	0 Brick	None	Yes	GWWSB	Green Pasture
0	0	2717	4/8/2019	Fair	15.05	0 Brick	None		GWWSB	Green Pasture
586.3	578.04	2724	9/19/2019	Good	8.25	0 Brick	None			Green Pasture
0	0 MH Not Sh	2725	9/19/2019	Good	3.83	0 Brick	None			Green Pasture
0	0 GPS Shot 5	2726	4/9/2019	Poor	0.00	0 Brick	None	Yes	GWWSB	Green Pasture



0	0 GPS Shot 5			2727	4/9/2019	Poor	8.60	0	None	Yes		Green Pasture
544	0			2754	2018	Good	7.25	0 Brick	None	Yes	GWWSB	East River WWTP
0	0			2756	4/5/2018	Good	3.66	0 Brick	None	No		East River WWTP
554	548.59			2767	6/15/2018	Good	5.50	0 Brick	None	Yes	GWWSB	East River WWTP
557.02	553.46			2768	6/15/2018	Good	4.50	0 Brick	None			East River WWTP
559.74	555.96			2769	6/15/2018	Good	3.83	0 Brick	None	No		East River WWTP
0	0			2783	10/18/2019	Good	6.50	0 Precast Concrete	None	Yes	GWWSB	East River WWTP
541.2	533.66			2787	10/18/2019	Good	5.25	0 Brick	None			East River WWTP
0	0			2804	9/18/2019	Good	16.08	0 Brick	None	No		Green Pasture
0	0 7.30' East			2824	1/28/2019	Good	8.33	0 Brick	None		GWWSB	Green Pasture
0	0			2825	1/28/2019	Good	0.00	0 Brick	None	No	GWWSB	Green Pasture
0	0 Shot With			2854	2/25/2019	Fair	7.66	0 Brick	None	Yes	GWWSB	Green Pasture
0	0			2859	5/17/2018	Good	5.00	0 Brick	None	No		East River WWTP
0	0 This MH N			2860	5/17/2018	Good	5.42	0 Brick	None	No		East River WWTP
0	0			2861	5/17/2018	Good	6.42	0 Brick	None	No		East River WWTP
0	0			2862	5/17/2018	Good	5.58	0 Brick	None	No		East River WWTP
0	0			2863	10/1/2018	Good	7.42	0 Brick	None	Yes	GWWSB	East River WWTP
583	0			2886	2/12/2018	Good	12.30	0 Precast Concrete	None	Yes	GWWSB	East River WWTP
0	0			2888	5/30/2018	Good	10.25	0 Brick	None	No		East River WWTP
615.67	607.5			2894	11/5/2019	Good	9.42	0 Precast Concrete	None			East River WWTP
0	0			2898	7/16/2019	Good	9.42	0 Precast Concrete	None	No		East River WWTP
602	595.5			2899	7/16/2019	Good	8.42	0 Precast Concrete	None	No		East River WWTP
0	0			2911	10/22/2018	Fair	4.10	0 Brick	None	Yes	GWWSB	East River WWTP
0	0			2918	10/25/2018	Fair	13.57	0 Brick	None	Yes	Private	East River WWTP
0	523.14	1987	658	2955	4/4/2019	Good	8.92	0 Precast Concrete	None			East River WWTP
0	0			2956	2/14/2019	Good	7.42	0 Brick	None	No	GWWSB	East River WWTP
0	585.6	1981		3006	1/21/2020	Good	14.25	0 Precast Concrete	None	No		East River WWTP
0	585	1981		3007	1/21/2020	Good	6.83	0 Precast Concrete	None	No		East River WWTP
0	569	1981		3009	1/21/2020	Good	5.75	0 Precast Concrete	None	No		East River WWTP
0	0			3036	10/19/2018	Good	4.50	0 Brick	None	Yes	GWWSB	East River WWTP
0	0			3039	3/28/2019	Good	6.10	0 Brick	None			East River WWTP
0	0			3054	3/28/2019	Good	5.50	0 Brick	None	No		East River WWTP
0	0			3055	5/4/2018	Good	6.75	0 Brick	None			East River WWTP
0	607.34	1981		3083	1/21/2020	Good	0.00	0 Precast Concrete	None	No		East River WWTP
0	587.61	1981		3084	1/21/2020	Good	5.66	0 Precast Concrete	None	No		East River WWTP
0	614	1981		3085	1/21/2020	Good	4.33	0 Precast Concrete	None	No		East River WWTP
0	613	1981		3086	1/21/2020	Good	7.50	0 Precast Concrete	None	No		East River WWTP
0	0			3088	5/17/2019	Good	10.33	0 Brick	None			East River WWTP
0	615	1981		3107	1/21/2020	Good	5.75	0 Precast Concrete	None	No		East River WWTP
0	614.12 Invert Fron	1981		3108	1/21/2020	Good	7.92	0 Precast Concrete	None	No		East River WWTP
0	609.47			3109	1/21/2020	Good	8.08	0 Precast Concrete	None			East River WWTP
0	0			3110	1/21/2020	Good	0.00	0 Precast Concrete	None	No		East River WWTP
0	0			3111	1/21/2020	Good	0.00	0 Precast Concrete	None	No		East River WWTP
0	612.7	1981		3114	1/21/2020	Good	7.08	0 Precast Concrete	None	No		East River WWTP
0	532.15	1987	658	3159	8/21/2019	Good	8.83	0 Precast Concrete	None	No		East River WWTP
0	535.95	1987	658	3160	8/21/2019	Good	10.66	0 Precast Concrete	None	No		East River WWTP
0	0			3182	1/3/2020	Good	15.83	0 Precast Concrete	None	No		East River WWTP
518.37	509.62			3203	10/11/2018	Good	8.83	0 Precast Concrete	None	Yes		East River WWTP
518.6	513.5			3204	10/11/2018	Good	5.92	0 Brick	None	Yes	GWWSB	East River WWTP
527.11	512.77			3208	5/30/2018	Good	11.30	0 Brick	None			East River WWTP
526.42	515.58			3209	5/30/2018	Good	10.66	0 Brick	None			East River WWTP
518.63	504.24 Invert 504.			3224	1/7/2019	Fair	14.20	0 Precast Concrete	None	No	GWWSB	East River WWTP
0	0 Infiltration			3265	1/7/2019	Poor	6.00	0 Brick	None	No	GWWSB	East River WWTP
0	0			3271	10/22/2019	Good	6.50	0 Brick	None			East River WWTP
0	0			3272	10/22/2019	Good	6.66	0 Brick	None			East River WWTP

0	0			3278	10/11/2018	Fair	5.92	0 Brick	None	Yes	GWWSB	East River WWTP
541	0			3305	2/5/2018	Fair	5.33	0 Brick	None	Yes	GWWSB	East River WWTP
539	0			3306	2/5/2018	Good	6.08	0 Brick	None	Yes	GWWSB	East River WWTP
0	0			3336	10/29/2019	Good	4.33	0 Brick	None			East River WWTP
0	0			3337	10/29/2019	Good	3.50	0 Brick	None	No		East River WWTP
0	0			3338	10/29/2019	Good	3.50	0 Brick	None			East River WWTP
551	0			3344	2018	Good	2.20	0 Brick	None	Yes	GWWSB	East River WWTP
0	0			3347	7/11/2019	Good	13.74	0 Brick	None	No		East River WWTP
0	0 Bad Invert			3348	7/11/2019	Fair	11.66	0 Brick	None			East River WWTP
0	0			3349	7/11/2019	Good	7.42	0 Brick	None	No		East River WWTP
0	0			3354	5/21/2019	Good	5.75	0 Brick	None			East River WWTP
0	0			3355	5/21/2019	Good	6.75	0 Brick	None			East River WWTP
0	0			3429	4/11/2018	Good	7.58	0 Precast Concrete	None	No		East River WWTP
0	0			3453	5/16/2018	Good	7.83	0 Precast Concrete	None	No		East River WWTP
591	0			3454	2/12/2018	Good	12.00	0 Precast Concrete	None	Yes	GWWSB	East River WWTP
582	0			3457	2/12/2018	Good	10.75	0 Precast Concrete	None	Yes	GWWSB	East River WWTP
571.21	563.86			3458	5/8/2018	Good	7.35	0 Precast Concrete	None			East River WWTP
590	0			3470	2/15/2018	Fair	7.16	0 Brick	None	Yes	GWWSB	S 6th St
577	0			3471	2/15/2018	Fair	7.25	0 Brick	None	Yes	GWWSB	S 6th St
0	0			3475	4/3/2018	Good	4.60	0 Brick	None	Yes	GWWSB	S 6th St
553.25	548.53			3477	2/14/2018	Fair	4.70	0 Brick	None	Yes	GWWSB	S 6th St
555.75	550 Not Found	1971	1042	3478	2/14/2018	Good	5.75	0 Brick	None	Yes	GWWSB	S 6th St
586	572.8			3479	2/14/2018	Good	6.33	0 Brick	None	Yes	GWWSB	S 6th St
0	525.1	1987	658	3482	4/4/2019	Good	16.40	0 Precast Concrete	None	No		East River WWTP
0	525.92	1987	658	3489	4/4/2019	Good	12.70	0 Precast Concrete	None	No		East River WWTP
0	511.22	1979	853	3493	5/30/2018	Good	7.75	0 Precast Concrete	None	No		East River WWTP
0	0			3494	5/30/2018	Good	8.50	0 Brick	None			East River WWTP
0	0			3495	5/30/2018	Good	8.58	0 Brick	None	No		East River WWTP
0	0			3496	5/30/2018	Good	8.58	0 Brick	None	No		East River WWTP
0	0			3497	5/30/2018	Good	8.50	0 Brick	None			East River WWTP
0	508.63	1987	658 Shown on Plan F	3498	5/30/2018	Good	8.00	0 Brick	None			East River WWTP
0	509.69 Direct conr	1987	658	3501	5/30/2018	Good	5.25	0 Precast Concrete	None	No		East River WWTP
0	585			3502	5/30/2018	Good	9.58	0 Precast Concrete	None	No		East River WWTP
0	548			3503	5/30/2018	Good	9.42	0 Precast Concrete	None			East River WWTP
0	528			3504	5/30/2018	Good	7.83	0 Precast Concrete	None			East River WWTP
0	517.73 Infiltration			3505	5/30/2018	Good	6.50	0 Precast Concrete	None	No		East River WWTP
0	513.88 Plat File sa	1979	853	3506	5/30/2018	Good	7.75	0 Precast Concrete	None	No		East River WWTP
0	506.32	1979	853	3507	5/30/2018	Good	8.66	0 Precast Concrete	None			East River WWTP
0	0			3508	5/30/2018	Good	6.50	0 Precast Concrete	None			East River WWTP
0	0			3509	5/30/2018	Good	9.67	0 Precast Concrete	None	No		East River WWTP
0	0			3510	5/30/2018	Good	12.00	0 Precast Concrete	None			East River WWTP
0	509.51	1987	658	3511	5/30/2018	Good	8.00	0 Precast Concrete	None	No		East River WWTP
0	0			3512	5/30/2018	Good	6.50	0 Precast Concrete	None	No		East River WWTP
0	0			3513	5/30/2018	Good	6.25	0 Precast Concrete	None	No		East River WWTP
0	530.06	1987	658	3515	5/30/2018	Good	6.33	0 Precast Concrete	None	No		East River WWTP
0	520	1987	658	3516	5/30/2018	Good	9.08	0 Precast Concrete	None	No		East River WWTP
0	511	1987	658	3517	5/30/2018	Good	6.68	0 Precast Concrete	None	No		East River WWTP
0	0			3521	5/30/2018	Good	10.58	0 Precast Concrete	None	No		East River WWTP
522.3	517.9	2003		3582	8/9/2019	Good	4.16	0 Precast Concrete	None		GWWSB	East River WWTP
0	0			3594	10/12/2018	Good	4.50	0 Brick	None	Yes	GWWSB	East River WWTP
0	0			3595	10/12/2018	Good	0.00	0 Brick	None	Yes	GWWSB	East River WWTP
527.53	521.23			3596	10/12/2018	Good	6.25	0 Brick	None	Yes	GWWSB	Trailor Park
520.93	0			3600	8/9/2019	Good	2.00	0 Precast Concrete	None	Yes		East River WWTP
521.54	518.63	2003		3602	8/9/2019	Good	3.83	0 Precast Concrete	None	No	GWWSB	East River WWTP
0	0			3606	10/10/2018	Good	6.33	0 Brick	None	Yes	GWWSB	Trailor Park



518.34	511.17			3608	10/10/2018	Good	7.25	0 Brick	None	Yes	GWWSB	Trailor Park
0	0			3609	10/10/2018	Good	12.00	0 Precast Concrete	None	Yes	GWWSB	Trailor Park
0	0			3610	10/18/2018	Good	9.58	0 Brick	None	Yes	GWWSB	Trailor Park
515.59	513.59			3611	10/10/2018	Good	2.16	0 Brick	None	Yes	GWWSB	Trailor Park
539.69	533.79			3615	6/8/2018	Good	5.33	0 Brick	None	No		Hood Ave
0	0			3713	2/25/2019	Good	5.92	0 Brick	None	No	GWWSB	Green Pasture
0	0			3785	10/31/2019	Good	6.00	0 Brick	None			East River WWTP
0	0			3786	11/1/2019	Good	8.75	0 Brick	None			East River WWTP
0	0 Heavy Infil	1988		3787	10/31/2019	Poor	7.75	1,988 Brick	Replaced			East River WWTP
0	0			3788	10/31/2019	Good	6.33	0 Brick	None	No		East River WWTP
0	0			3789	10/31/2019	Good	5.50	0 Brick	None	No		East River WWTP
0	0			3790	10/31/2019	Good	4.92	0 Brick	None			East River WWTP
0	0			3791	10/31/2019	Good	8.50	0 Brick	None	No		East River WWTP
0	0			3792	10/31/2019	Good	6.58	0 Brick	None	No		East River WWTP
0	0			3793	10/31/2019	Good	5.83	0 Brick	None			East River WWTP
0	0			3794	5/30/2018	Good	7.16	0 Brick	None	Yes		East River WWTP
0	0			3795	10/31/2019	Good	9.58	0 Brick	None	No		East River WWTP
0	0			3796	10/31/2019	Good	19.58	0 Brick	None	No		East River WWTP
0	0 Infiltration			3797	10/31/2019	Fair	20.25	0 Brick	None	No		East River WWTP
0	0			3798	10/31/2019	Good	17.66	0 Brick	None			East River WWTP
0	0 Roots / Inf			3801	11/14/2019	Fair	7.45	0 Brick	None			East River WWTP
0	0 Depth Fror			3802	11/13/2019	Good	7.55	0 Brick	None	No		East River WWTP
0	0			3803	11/18/2019	Good	6.16	0 Brick	None			East River WWTP
0	0			3804	11/18/2019	Good	6.42	0 Brick	None			East River WWTP
0	0			3809	11/18/2019	Good	3.42	0 Brick	None			East River WWTP
0	0			3810	11/18/2019	Good	4.83	0 Brick	None			East River WWTP
0	0 Roots Heav			3836	7/31/2018	Poor	7.75	0 Precast Concrete	None	No		East River WWTP
0	0 Roots Med			3837	7/31/2018	Poor	7.92	0 Precast Concrete	None	No		East River WWTP
0	0			3838	7/31/2018	Good	4.08	0 Precast Concrete	None	No		East River WWTP
0	588.5	1987		3975	5/6/2019	Good	7.25	0 Precast Concrete	None			MH6052-RBC
0	567.42	1987		3980	8/9/2019	Good	14.16	0 Precast Concrete	None	No		MH6052-RBC
0	568.02 Infiltration	1987		3984	5/6/2019	Good	11.75	0 Precast Concrete	None	No		MH6052-RBC
0	580.9	1987		3986	5/6/2019	Good	6.00	0 Precast Concrete	None	No		MH6052-RBC
0	583 Buried 8' D			3990	5/6/2019	Good	4.16	0 Precast Concrete	None	No		MH6052-RBC
0	530.83 Infiltration	1960	RFC-17, P-11035	4038	6/5/2019	Good	11.70	0 Brick	Epoxy Liner			Rainbow Drive
536.04	530.04		RFC-17, P-11035	4039	6/5/2019	Good	4.90	0 Brick	None			Rainbow Drive
0	0			4059	6/7/2019	Good	6.16	0 Brick	None			Rainbow Drive
0	0 Infiltration			4060	11/26/2019	Good	7.25	0 Brick	None			Rainbow Drive
0	0			4063	11/26/2019	Good	5.08	0 Brick	None			Rainbow Drive
0	510.31 Small Inver	1960		4113	11/21/2019	Good	10.16	0 Brick	None			Rainbow Drive
0	0			4118	7/24/2019	Good	3.83	0 Brick	None			Rainbow Drive
0	503.09 Covered Uj	1960		4119	9/9/2019	Good	0.00	0 Brick	None			Rainbow Drive
0	503.76	1960		4120	9/9/2019	Good	6.42	0 Brick	None			Rainbow Drive
0	504.74	1960		4121	5/20/2019	Good	6.55	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	505.63 Invert to gr	1960		4122	6/6/2019	Good	5.92	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	509.38 Inv. From S			4126	8/23/2019	Good	7.75	0 Brick	None			Eura Brown
0	511.13 6' 9" Frorr	1969		4127	8/23/2019	Good	7.75	0 Brick	None			Eura Brown
0	527.5 Inv. From V			4128	9/11/2019	Good	5.00	0 Brick	None			Rainbow Drive
0	532.02	1969		4129	8/28/2019	Good	6.41	0 Brick	None			Eura Brown
0	526.02	1969		4130	8/28/2019	Good	4.25	0 Brick	None			Eura Brown
0	0	1969		4131	8/29/2019	Good	6.58	0 Brick	None			Eura Brown
0	516.24 Roots	1969		4132	8/29/2019	Good	6.16	0 Brick	None			Eura Brown
0	520.55	1969		4133	9/11/2019	Good	7.92	0 Brick	None			Eura Brown
0	522.25	1969		4134	9/11/2019	Good	6.33	0 Brick	None			Eura Brown
0	525	1969		4135	9/11/2019	Good	6.42	0 Brick	None			Eura Brown



0	0			4138	8/29/2019	Good	7.92	0 Brick	None			Rainbow Drive
0	0	1969		4141	8/29/2019	Good	5.16	0 Brick	None			Rainbow Drive
0	534	1969		4142	8/28/2019	Good	5.16	0 Brick	None			Eura Brown
0	0	0 4' From So-		4143	8/27/2019	Good	4.08	0 Brick	None			Rainbow Drive
0	0			4144	9/20/2019	Fair	7.25	0 Brick	None			Rainbow Drive
0	0			4145	9/16/2019	Good	6.16	0 Brick	None			Rainbow Drive
0	0			4146	9/20/2019	Good	13.16	0 Brick	None			Rainbow Drive
0	0	0 2 SL		4147	9/20/2019	Good	7.08	0 Brick	None			Rainbow Drive
0	0			4149	7/29/2019	Good	5.75	0 Brick	None			Rainbow Drive
0	0			4151	7/29/2019	Good	6.33	0 Brick	None			Rainbow Drive
0	0			4152	7/29/2019	Good	6.33	0 Brick	None			Rainbow Drive
0	0	0 Pipe is 4' 1		4153	7/29/2019	Good	6.42	0 Brick	None			Rainbow Drive
0	0			4154	10/7/2019	Fair	4.16	0 Brick	None			Rainbow Drive
0	0	0 4' 1" From		4155	10/8/2019	Fair	4.25	0 Brick	None			Rainbow Drive
0	0			4156	9/30/2019	Good	7.25	0 Brick	None			Rainbow Drive
0	0			4157	9/30/2019	Good	6.08	0 Brick	None			Rainbow Drive
0	0			4158	9/30/2019	Good	4.75	0 Brick	None			Rainbow Drive
0	0			4159	9/30/2019	Good	7.92	0 Brick	None			Rainbow Drive
0	0			4160	10/8/2019	Good	2.66	0 Brick	None			Rainbow Drive
0	0			4161	10/8/2019	Good	2.92	0 Brick	None			Rainbow Drive
0	0			4162	10/8/2019	Good	6.25	0 Brick	None			Rainbow Drive
0	0	0 Depth Fror		4163	10/14/2019	Good	6.45	0 Brick	None			Rainbow Drive
0	0	0 Depth Fror		4164	10/14/2019	Good	6.53	0 Brick	None			Rainbow Drive
562.4	555.2	Depth Fror	RFC-17, P-11035	4165	10/14/2019	Good	7.30	0 Brick	None			Rainbow Drive
0	0			4166	10/28/2019	Good	4.42	0 Brick	None			Rainbow Drive
0	0			4167	10/28/2019	Good	14.16	0 Brick	None			Rainbow Drive
0	0			4168	1/16/2020	Good	9.58	0 Brick	None			Rainbow Drive
0	0	0 Drop In 8' :		4170	1/16/2020	Good	12.33	0 Brick	None			Rainbow Drive
0	0	0 Roots		4172	1/16/2020	Fair	7.16	0 Brick	None			Rainbow Drive
0	0			4174	9/23/2019	Good	5.83	0 Brick	None			Rainbow Drive
0	0			4175	9/23/2019	Fair	4.75	0 Brick	None			Rainbow Drive
0	0			4176	9/23/2019	Good	6.00	0 Brick	None			Rainbow Drive
0	0			4177	10/15/2019	Good	6.66	0 Brick	None			Rainbow Drive
0	0			4178	10/15/2019	Good	7.00	0 Brick	None			Rainbow Drive
0	0			4179	10/15/2019	Good	8.00	0 Brick	None			Rainbow Drive
0	0			4181	10/15/2019	Good	6.42	0 Brick	None			Rainbow Drive
0	0			4182	6/13/2019	Good	6.58	0 Brick	None			Rainbow Drive
0	0			4183	7/29/2019	Good	7.33	0 Brick	None			Rainbow Drive
0	0	0 Depth Fror		4184	7/29/2019	Good	8.16	0 Brick	None			Rainbow Drive
0	0	0 Depth Fror		4185	7/29/2019	Good	7.25	0 Brick	None			Rainbow Drive
0	557.74	New MH Fi	2012 RFC-17, P-11035	4186	10/14/2019	Good	8.08	2,012 Brick	Replaced			Rainbow Drive
0	0	0 Invert neec		4187	7/25/2019	Poor	4.75	0 Brick	None			Rainbow Drive
0	0			4188	7/25/2019	Good	5.42	0 Precast Concrete	None			Rainbow Drive
0	0			4189	7/25/2019	Fair	5.58	0 Brick	None			Rainbow Drive
0	0			4190	7/29/2019	Good	8.08	0 Brick	None			Rainbow Drive
0	0			4191	7/25/2019	Good	5.62	0 Brick	None			Rainbow Drive
0	0			4192	9/6/2018	Good	3.66	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	0			4193	9/6/2018	Good	4.75	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	567.13			4194	7/23/2019	Good	5.66	0 Brick	None			Rainbow Drive
0	0			4195	7/23/2019	Good	3.50	0 Brick	None			Rainbow Drive
0	0			4196	9/6/2018	Good	4.25	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	0			4197	9/6/2018	Good	5.00	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	0			4198	7/24/2019	Fair	8.67	0 Brick	None			Rainbow Drive
0	0			4199	2018	Good	0.00	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	0			4200	9/10/2018	Good	4.83	0 Brick	None	Yes	GWWSB	Rainbow Drive

0	0		4201	9/14/2018	Good	3.25	0 Brick	None	Yes	GWWSB	Rainbow Drive
530	525.55		4203	2018	Good	4.45	0 Brick	None	Yes	GWWSB	Rainbow Drive
535	0		4204	2018	Good	3.16	0 Brick	None	Yes		Rainbow Drive
0	0 Roots		4207	7/25/2019	Fair	9.50	0 Brick	None			Rainbow Drive
0	585.5		4216	7/23/2019	Good	5.83	0 Brick	None			Rainbow Drive
585.7	585		4217	7/23/2019	Good	6.50	0 Brick	None			Rainbow Drive
583	579.5		4218	7/23/2019	Good	10.42	0 Brick	None			Rainbow Drive
572	571.2 Memphis T		4219	7/23/2019	Good	7.83	0 Brick	None			Rainbow Drive
0	0		4220	7/24/2019	Good	4.33	0 Brick	None			Rainbow Drive
0	0 Covered Uj		4225	6/13/2019	Good	5.00	0 Brick	None			Rainbow Drive
0	0		4226	10/9/2019	Good	6.00	0 Brick	None			Rainbow Drive
0	0		4227	10/2/2018	Fair	3.92	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	519.94 Infiltration		4228	8/27/2019	Fair	7.42	0 Brick	None			Eura Brown
0	517.56		4229	8/27/2019	Good	10.50	0 Brick	None			Eura Brown
0	515.44		4230	8/27/2019	Good	11.25	0 Brick	None			Eura Brown
0	513.32		4231	8/27/2019	Good	8.75	0 Brick	None			Eura Brown
0	0		4232	8/23/2019	Good	10.66	0 Precast Concrete	None			Eura Brown
0	0		4235	9/16/2019	Good	7.41	0 Brick	None			Rainbow Drive
0	0		4236	10/2/2018	Fair	5.25	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	0		4237	10/3/2019	Good	6.50	0 Brick	None			Rainbow Drive
0	0		4239	8/23/2019	Good	14.00	0 Precast Concrete	None			Eura Brown
0	0 Lateral in h		4244	12/31/2018	Good	9.58	0 Brick	None	No	GWWSB	Rainbow Drive
0	0		4251	7/29/2019	Good	11.16	0 Brick	None			Rainbow Drive
0	0		4262	11/22/2019	Excellent	11.66	0 Brick	None			Rainbow Drive
0	0		4263	11/21/2019	Good	8.42	0 Brick	None			Rainbow Drive
0	517.1	1969	4267	8/19/2019	Good	3.15	0 Brick	None			Eura Brown
0	520.32 4' From So	1969	4268	8/15/2019	Good	5.16	0 Brick	None			Eura Brown
0	519	1969	4269	8/16/2019	Good	5.75	0 Brick	None			Eura Brown
0	513.92 6' 3" From	1969	4271	8/19/2019	Good	6.25	0 Brick	None			Eura Brown
0	517.8	1969	4272	8/19/2019	Good	10.25	0 Brick	None			Eura Brown
0	528.5	1969	4273	8/15/2019	Good	5.25	0 Brick	None			Eura Brown
0	526.5	1969	4274	8/19/2019	Good	6.75	0 Brick	None			Eura Brown
0	519.5	1969	4275	8/19/2019	Good	5.58	0 Brick	None			Eura Brown
0	512.56 3' 2" From	1969	4276	8/20/2019	Good	5.08	0 Brick	None			Eura Brown
0	515.15 Inv. From f	1969	4277	8/21/2019	Good	8.58	0 Brick	None			Eura Brown
0	517 Covered Uj	1969	4278	8/28/2019	Good	0.00	0 Brick	None			Eura Brown
0	0		4317	8/13/2019	Good	8.00	0 Precast Concrete	None	Yes	GWWSB	Rainbow Drive
0	0		4318	8/13/2019	Good	5.83	0 Precast Concrete	None	Yes	GWWSB	Rainbow Drive
0	0		4321	8/13/2019	Good	7.50	0 Precast Concrete	None	Yes	GWWSB	Rainbow Drive
0	0		4323	8/13/2019	Good	9.66	0 Precast Concrete	None	Yes	GWWSB	Rainbow Drive
0	501.28	1960	4326	9/9/2019	Good	19.16	0 Brick	None			Rainbow Drive
0	0		4334	11/26/2019	Good	7.50	0 Brick	None			Rainbow Drive
0	0		4355	7/29/2019	Good	8.55	0 Brick	None			Rainbow Drive
0	0 Cement Co	1963	4362	5/29/2018	Good	10.75	0 Brick	None	Yes		N Gadsden B
565.61	557.61 Lateral in h		4399	2/8/2019	Good	7.92	0 Brick	None		GWWSB	N Gadsden A
0	0		4400	6/27/2019	Good	9.80	0 Brick	None			N Gadsden A
0	0		4402	6/27/2019	Good	4.33	0 Brick	None			N Gadsden A
0	0 4.5' From f 2012 Rehab	783.03	4415	12/10/2018	Excellent	7.20	2,012 Brick	Epoxy Liner	Yes	GWWSB	Browning Circle
0	0		4417	12/10/2018	Fair	3.92	0 Brick	None		GWWSB	Browning Circle
0	0		4419	12/11/2018	Good	7.42	0 Brick	None		GWWSB	N Gadsden B
0	0 Lateral in h		4420	12/11/2018	Fair	9.08	0 Brick	None		GWWSB	N Gadsden B
0	0		4442	11/20/2019	Good	5.66	0 Brick	None			S 6th St
0	0		4444	11/20/2019	Good	6.58	0 Brick	None			S 6th St
0	0		4473	10/24/2018	Good	4.42	0 Brick	None	Yes	GWWSB	S 6th St
0	0		4474	10/1/2018	Good	3.75	0 Brick	None	Yes	GWWSB	S 6th St



0	0			4475	10/1/2018	Fair	0.00	0 Brick	None	Yes	GWWSB	S 6th St
0	515.37			4476	10/24/2018	Good	3.33	0 Brick	None	Yes	GWWSB	S 6th St
0	0 Brick			4480	5/30/2018	Good	7.00	0 GCU Epoxy	None			S 6th St
518.04	510.34			4485	8/14/2018	Fair	7.83	0 Brick	None			S 6th St
514.5	504 Lateral in h	1985		4491	2/5/2019	Excellent	10.50	0 Precast Concrete	None		GWWSB	S 6th St
539.31	532.21 Added 2' tr			4506	8/22/2018	Good	7.10	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0		562	4530	7/23/2018	Good	13.16	0 Precast Concrete	None	No		S 6th St
542.31	535.51 1205 W. M	2006		4532	3/6/2019	Fair	6.76	2,006 Brick	Replaced	Yes	GWWSB	S 6th St
0	529.62 Precast wit			4533	3/6/2019	Good	8.45	0 Precast Concrete	None	Yes	GWWSB	S 6th St
544.8	535.59			4534	3/8/2019	Fair	9.18	2,016 Brick	Epoxy Liner	Yes	GWWSB	S 6th St
520.47	515.73			4566	12/4/2019	Good	4.75	0 Brick	None	Yes	GWWSB	S 6th St
535.63	528.13 light roots			4567	12/4/2019	Fair	7.50	0 Brick	None	Yes		S 6th St
512.727	495.99			4569	8/8/2019	Good	16.71	0 Precast Concrete	None			S 6th St
513.02	496.82			4574	8/8/2019	Good	15.92	0 Precast Concrete	None			S 6th St
509.65	501.35	2013 Rehab		4576	12/5/2019	Good	8.30	2,013 Brick	Epoxy Liner	Yes	GWWSB	S 6th St
0	497.4 Large Inver			4582	8/8/2019	Good	15.92	0 Precast Concrete	None			S 6th St
0	499.56			4583	8/8/2019	Good	14.50	0 Precast Concrete	None			S 6th St
0	0			4603	5/30/2018	Good	6.67	0 Brick	None			Woodland
0	0 Attalla Sew.			4620	11/19/2019	Good	6.91	0 Brick	None		Private	Bryant St
0	0 Attalla Sew.			4621	11/19/2019	Good	5.66	0 Brick	None		Private	Bryant St
0	0			4642	1/15/2019	Good	4.83	0 Precast Concrete	None		GWWSB	S 6th St
0	550.44			4643	9/10/2018	Good	11.16	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	548.11			4645	9/10/2018	Good	6.83	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0			4670	9/10/2018	Good	4.16	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0			4688	1/15/2019	Fair	9.66	0 Brick	None		GWWSB	S 6th St
0	0			4700	4/25/2018	Good	7.33	0 Brick	None			S 6th St
0	0			4701	4/27/2018	Good	6.92	0 Brick	None			S 6th St
0	0			4702	4/27/2018	Good	7.58	0	None			S 6th St
0	0			4703	4/27/2018	Good	6.83	0 Brick	None			S 6th St
0	0 Joint Offse			4706	9/26/2019	Fair	4.58	0 Brick	None			S 6th St
0	0			4710	1/14/2019	Poor	0.00	0 Brick	None	No	GWWSB	S 6th St
538.12	516.17 Lateral in h	2008		4711	1/15/2019	Fair	21.95	2,008 Brick	Replaced		GWWSB	S 6th St
0	0			4712	1/14/2019	Fair	20.08	0 Brick	None		GWWSB	S 6th St
544.89	535.78			4740	3/26/2016	Good	7.85	0 Brick	None	Yes	GWWSB	Owens St
512.72	499.85			4760	3/13/2019	Good	12.87	0 Precast Concrete	None	Yes	GWWSB	S 6th St
533.23	527.54			4821	1/30/2019	Good	5.80	2,016 Brick	Epoxy Liner		GWWSB	S 6th St
0	0			4822	12/17/2018	Good	6.42	0 Brick	Cement Liner		GWWSB	S 6th St
528.57	523.73 Creek Cros			4823	8/22/2019	Good	4.84	0 Brick	None			S 6th St
0	0			4936	8/6/2018	Good	7.50	0 Precast Concrete	None			Airport Rd
591.41	577.17		1219	4953	10/22/2018	Good	14.24	2,014 Brick	Epoxy Liner	Yes		East River WWTP
610.61	603.23		15997	4963	7/16/2019	Good	7.75	0 Precast Concrete	None			East River WWTP
0	0			4983	8/7/2018	Good	6.50	0 Brick	None			Green Pasture
0	0			4985	4/9/219	Good	5.70	0 Brick	None			Green Pasture
0	0			4986	4/12/2019	Fair	5.35	0 Brick	None		GWWSB	Green Pasture
534.16	527.37			5026	4/13/2018	Good	6.74	0 Precast Concrete	None			East River WWTP
0	0			5042	10/10/2018	Fair	9.25	0 Brick	None	Yes	GWWSB	Trallor Park
0	0 EOL			5045	6/20/2018	Fair	4.00	0 Brick	None			S 6th St
0	0			5052	3/28/2019	Good	6.00	0 Brick	None			East River WWTP
0	0			5055	5/1/2018	Good	5.42	0 Brick	None			S 6th St
516.62	509.92 This MH Nc			5057	8/14/2018	Fair	6.58	0 Brick	None			S 6th St
0	0	2006		5072	1/29/2019	Good	7.67	2,006 Precast Concrete	Replaced		GWWSB	S 6th St
0	0	2006		5073	7/10/2018	Good	4.42	2,006 Precast Concrete	Replaced			S 6th St
0	0			5074	6/6/2019	Good	4.00	0 Precast Concrete	None			S 6th St
0	0			5080	1/21/2020	Good	0.00	0 Precast Concrete	None			East River WWTP
540.87	532.97			5092	4/25/2018	Good	7.90	0 Brick	None			S 6th St



530.88	523.37			5094	2/20/2019		7.65	0 Brick	None		GWWSB	N Gadsden A
0	0			5098	5/16/2018	Good	9.33	0 Precast Concrete	None			East River WWTP
0	0			5102	5/30/2018	Good	9.16	0 Brick	None			East River WWTP
538	0			5104	9/17/2018	Good	4.25	0 Brick	None	Yes	GWWSB	Rainbow Drive
0	0 Roots			5105	11/26/2019	Fair	4.66	0 Brick	None			Rainbow Drive
536.64	521.97	2008		5122	8/6/2018	Good	15.42	0 Precast Concrete	None			Airport Rd
0	518 Covered Uj	1969		5161	8/21/2019	Unknown	4.75	0 Brick	None			Eura Brown
0	0			5162	5/15/2018	Good	2.92	0 Brick	None			Owens St
0	0			5174	9/20/2018	Fair	10.16	0 Brick	None	Yes	GWWSB	S 6th St
0	0			5183	6/5/2018	Good	6.75	0 Precast Concrete	None			S 6th St
0	0			5185	7/18/2019	Fair	8.00	0 Brick	None			S 6th St
0	0			5215	10/31/2019	Good	12.25	0 Brick	None			East River WWTP
0	0 Direct Coni			5216	5/30/2018	Good	5.16	0 Brick	None			East River WWTP
0	0			5227	3/22/2019	Good	5.83	0 Brick	None			S 6th St
0	0			5262	2/11/2019	Poor	10.58	0 Brick	None		GWWSB	N Gadsden A
556.1	550.45			5288	2/22/2019	Good	5.60	0 Brick	None		GWWSB	Bryant St
0	0			5294	10/8/2019	Fair	5.50	0 Brick	None			Rainbow Drive
549.38	541.23	2003		5305	7/2/2019	Good	5.16	0 Brick	None			S 6th St
0	0	2006		5322	5/3/2018	Good	6.08	2,006 Precast Concrete	Replaced			S 6th St
0	0	1985		5323	4/19/2018	Good	4.66	1,985 Precast Concrete	Replaced			S 6th St
0	0 Covered	1985		5324	8/31/2018	Unknown	0.00	1,985 Precast Concrete	Replaced		GWWSB	S 6th St
619	0	2006		5328	7/12/2019	Excellent	8.00	2,006 Precast Concrete	Replaced	Yes	GWWSB	S 6th St
0	0			5335	2018	Good	5.92	0 Precast Concrete	None	Yes	GWWSB	East River WWTP
0	0	2012		5342	8/13/2019	Excellent	4.58	2,012 Precast Concrete	Replaced	Yes	GWWSB	Rainbow Drive
0	0 Creek Cros	2012	RFC-17, P-11035	5371	8/22/2019	Good	4.75	0 Precast Concrete	None			S 6th St
582.32	575.65 Located by			5376	2/14/2019	Fair	7.58	2,016 Brick	Epoxy Liner	Yes	GWWSB	S 6th St
0	0 Located by			5378	2/27/2019	Good	4.20	0 Brick	None	Yes	GWWSB	S 6th St
549.21	543.31 Mains Put i			5381	7/11/2019	Fair	5.90	0 Brick	None	Yes		S 6th St
520.3	513.97 Roots			5406	12/4/2019	Fair	6.42	0 Brick	None	Yes		S 6th St
537.24	529.94			5409	12/4/2019	Fair	7.30	0 Brick	None	Yes	GWWSB	S 6th St
0	0			5434	10/18/2019	Good	5.75	0 Brick	None			East River WWTP
0	0 Work by LI	2013	16006	5435	9/14/2018	Good	5.50	0 Precast Concrete	None	Yes	GWWSB	S 6th St
0	0			5438	5/9/2018	Good	5.66	0 Precast Concrete	None			East River WWTP
0	0 Direct Coni			5439	5/10/2018	Good	7.00	0 Precast Concrete	None			East River WWTP
0	0			5442	4/9/2018	Good	5.83	0 Brick	None			S 6th St
550.3	532.76	2013	JBWT 10043	5446	2/20/2019	Good	17.54	0 Precast Concrete	None		GWWSB	N Gadsden A
0	0			5455	2/11/2019	Excellent	4.25	0 Precast Concrete	None	No	GWWSB	N Gadsden A
0	0			5454	2/12/2019	Excellent	4.50	0 Precast Concrete	None		GWWSB	N Gadsden A
0	0			5488	8/17/2018	Good	4.25	0 Brick	None			S 6th St
0	0			5489	5/17/2019	Good	7.75	0 Brick	None	Yes		S 6th St
0	567.76 MH needs	2014	1217	5490	2/14/2019	Good	7.16	0 Precast Concrete	None		GWWSB	Hickory St
0	0	2014		6046	10/31/2019	Good	5.50	0 Precast Concrete	None			East River WWTP
512.79	496.55			7001	8/8/2019	Good	16.15	0 Precast Concrete	None			S 6th St
0	0 Lift Station MH for GIS			6055	5/29/2018	Good	10.75	0 Brick	None			N Gadsden B
532.95	528.28 Found by D. Bowen 5-13-15			6007	1/30/2019	Fair	4.67	0 Brick	None		GWWSB	S 6th St
0	0			6010	2/11/2019	Fair	8.08	0 Brick	None		GWWSB	N Gadsden A
0	0	2016		7024	1/21/2020	Good	0.00	2,016 Precast Concrete	Replaced			East River WWTP
0	0 WAC	2016		7026	2/27/2019	Good	6.20	2,016 WAC	Replaced		GWWSB	S 6th St
0	0 WAC	2016		7032	8/20/2018	Good	4.33	2,016 WAC	Replaced			S 6th St
568.78	564.24			6019	9/3/2019		4.54	0 Brick			GWWSB	S 6th St
576.71	571.21			7049	9/3/2019	Good	5.50	0 Brick				S 6th St
0	0			7050	12/2/2019	Good	4.75	0 Brick				S 6th St
593.69	588.11			7051	6/5/2018	Good	5.75	0 Precast Concrete				S 6th St
0	0 268' South	2017		7061	6/19/2019	Good	7.42	0 WAC		Yes		S 6th St
0	0 EOL 247' N	2017		7062	7/17/2018	Good	5.58	0 WAC				S 6th St

0	0 EOL 377' N	2017	7066	9/24/2018	Excellent	5.42	0 WAC	Yes	GWWSB	S 6th St
0	0 EOL 260' S	2017	7067	9/5/2018	Excellent	4.66	0 WAC	Yes	GWWSB	S 6th St
0	0 EOL 445' W	2017	7068	7/2/2019	Excellent	4.50	0 WAC			S 6th St
0	0 Chamber. I	2017	7070	6/5/2018	Good	3.75	0 WAC			S 6th St
0	0 EOL 153' E	2017	7091	6/5/2018	Good	3.25	0 WAC			S 6th St
0	0		6022	6/3/2019	Excellent	4.66	0 WAC			S 6th St
541.37	531.65	1958	1955	12/11/2018	Fair	10.16	2,010 Brick		Cement Liner	GWWSB N Gadsden B
0	0		4831	1/30/2019	Fair	8.50	0 Brick	No		GWWSB S 6th St
542.2	0		6033	2018	Good	8.67	0 Brick	Yes		GWWSB S 6th St
0	0		7092	8/3/2018	Fair	7.50	0 Brick			S 6th St
0	0 Possibly MH 4847		6036	3/13/2018		6.25	0 Brick	Yes		GWWSB S 6th St
0	0		6035	3/13/2018		7.66	0 Brick	Yes		GWWSB S 6th St
0	0	2018	6034	3/3/2018		7.92	0 Brick	Yes		GWWSB S 6th St
0	0		7094	9/20/2018	Good	4.66	0 Brick	Yes		GWWSB
554.9	0 VCP		8007	2018	Good	4.58	0 Brick	Yes		GWWSB
556	0		8005	2018	Fair	3.83	0 Brick	Yes		GWWSB
552.6	0		8006	2018	Good	3.75	0 Precast Concrete	Yes		GWWSB
0	0		8008	2018		0.00	0 Brick	Yes		GWWSB
0	0		8009	2018		5.58	0 Precast Concrete			GWWSB
0	0		8010	2018		4.83	0 Brick	Yes		Private
0	0		8011	2018		5.58	0 Brick	Yes		Private
0	0		8013	2018		6.16	0 Brick	Yes		Private
0	0		8019	1/22/2019	Fair	8.66	0 Brick	Yes		GWWSB S 6th St
0	0		0	4/11/2019	Excellent	0.00	0 Precast Concrete	Yes		GWWSB S 6th St
0	0		8059	4/11/2019	Good	5.66	0 Precast Concrete	Yes		GWWSB S 6th St

# SUPER LAW GROUP, LLC

November 18, 2021

**Via E-mail and Certified Mail, Return Receipt Requested**

Ben Reed, Chair  
The Water Works and Sewer Board of the City of Gadsden  
515 N Albert Rains Blvd.  
Gadsden, AL 35901

Chad Hare, General Manager  
The Water Works and Sewer Board of the City of Gadsden  
515 N Albert Rains Blvd.  
Gadsden, AL 35901  
chare@gadsdenwater.org

Mayor Sherman Guyton  
City of Gadsden  
90 Broad Street  
Gadsden, AL 35901  
achambers@cityofgadsden.com

Re: Notice of Violation and Intent to File Suit under the Clean Water Act

Mr. Reed, Mr. Hare, and Honorable Mayor Guyton:

You are hereby notified that Coosa Riverkeeper, the Center for Biological Diversity, Advance Etowah, and Our Children's Earth Foundation ("Notifiers") intend to file suit against The Water Works and Sewer Board of the City of Gadsden ("the Board") for serious and ongoing violations of the Federal Water Pollution Control Act ("Clean Water Act" or "CWA").<sup>1</sup> Notifiers intend to file suit under the "citizen suit" provision of the Clean Water Act, Section 505(a),<sup>2</sup> as organizations and on behalf of their adversely affected members, in the United States District Court for the Northern District of Alabama seeking appropriate equitable relief and civil penalties 60 days from the postmark date of this letter.<sup>3</sup>

Notifiers intend to file their lawsuit because the Board regularly violates the Clean Water Act by discharging untreated sewage to the waters in and around Gadsden. For years, the Board has allowed sanitary sewers in Gadsden to fall into disrepair. Cracked and broken sewers, leaking manholes, uncleared blockages, pump station failures and other problems cause untreated sewage to discharge from manholes, underground breaks in sewer pipes, and other points. These sewer system defects also allow rainwater and groundwater to enter the sanitary sewer system, a problem referred to as "inflow and infiltration" (or "I&I"). The excess water in the system overwhelms the hydraulic capacity of sewer pipes, manholes, and other sewer infrastructure, leading to high volume overflows of untreated sewage. All of these sanitary

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<sup>1</sup> 33 U.S.C. § 1251 et seq.

<sup>2</sup> 33 U.S.C. § 1365(a).

<sup>3</sup> See 40 C.F.R. § 135.2(a)(3)(c) (notice of intent to file suit is deemed to have been served on the postmark date).



sewage overflows enter streets, homes, and ultimately the waters surrounding the City of Gadsden – the Coosa River, Neely Henry Lake, Big Wills Creek, Black Creek, and their tributaries and surrounding wetlands.

The Board has been issued two National Pollutant Discharge Elimination System (“NPDES”) permits that control discharges of sewage from the Board’s two sewer systems and sewage treatment plants. The Board’s failure to maintain its sanitary sewage infrastructure is itself a violation of the Board’s NPDES permits. In addition, the excessive inflow and infiltration in the sanitary sewers leads to multiple other violations of the law. Gadsden’s other violations of its NPDES permits and the Clean Water Act include:

- recurrent, unauthorized discharges of raw sewage from manholes and other points throughout the city to waters of the United States;
- continually misreporting the extent and effect of unauthorized sanitary sewer overflows;
- exceedances of numeric effluent limits on the discharge from the West River sewage treatment plant; and
- discharges of sewage that causes or contribute to violations of water quality standards in portions of the Coosa River, Black Creek, and Big Wills Creek.

Coosa Riverkeeper, the Center for Biological Diversity, Advance Etowah, and Our Children’s Earth Foundation are compelled to file suit in federal court to address the Board’s long history of violations and its inadequate responses to the dozens of raw sewage discharges that enter Gadsden’s streets and waters every year.

## I.

### **BACKGROUND**

#### **A. The Board Is Authorized to Discharge Sewage from Two Publicly Owned Treatment Works**

Under the Clean Water Act:

The term Publicly Owned Treatment Works or POTW means a treatment works as defined by section 212 of the Act, which is owned by a State or municipality . . . [it] includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also

includes sewers, pipes and other conveyances only if they convey wastewater to a POTW Treatment Plant.<sup>4</sup>

The Board operates two POTWs in Gadsden: on their NPDES permits, these POTWs are named the East River Wastewater Treatment Plant (“East River POTW”) and the West River Wastewater Treatment Plant (“West River POTW”). Both POTWs discharge into the Coosa River. Each POTW consists of both a sewage treatment plant (whose address is provided on the NPDES permit) and a network of sewers that connects homes and businesses to the plant.

Discharges from certain enumerated outfalls at the two POTWs to the Coosa River are authorized pursuant to the Board’s NPDES permits. The East River POTW is covered by permit number AL0022659, and the West River POTW is covered by permit number AL0053201.

Each of these NPDES permits contains terms and limitations regulating how and where the Board is authorized to discharge pollution from each POTW to the Coosa River. The outfalls listed in these NPDES permits are the only locations from which Gadsden is authorized to discharge pollution, and only if the discharges comply with all terms and limitations stated in the permit.

Each permit also contains other terms and limitations that regulate maintenance, monitoring, recordkeeping, and other matters, all designed to ensure that Gadsden’s sewers and sewage treatment plants are well maintained, well managed, and that problems are observed, reported accurately, and addressed in a timely manner. A citizen can bring suit to address any violation of any term of a NPDES permit and ensure compliance with all terms of the permit.<sup>5</sup>

## **B. The Problem of Inflow and Infiltration**

The environmental problems and Clean Water Act violations arising in the East River POTW and West River POTW that are the subject of this Notice all originate with a central problem: excessive inflow and infiltration.

Inflow generally refers to water other than wastewater—typically rain or snowmelt—that enters a sanitary sewer system through a direct connection to the sewer. Infiltration generally refers to other water that enters the sanitary sewer underground, for example through defects in the sewer pipes or other infrastructure. Infiltration can be long-term seepage of water into a sanitary sewer system from the water table, or a rapid increase in sanitary sewer flow during and immediately after a rainfall event due to rapidly rising groundwater. Inflow and infiltration may

<sup>4</sup> 40 C.F.R. § 403.3(q); *see also* CWA 212(2)(A) and (B), 33 U.S.C. § 1292(2)(A) and (B) (A treatment works includes “sewage collection systems, pumping, power and other equipment, and their appurtenances” and “sanitary sewer systems.”); 33 U.S.C. § 1362(4) (defining “municipality” as any “public body created by or pursuant to State law and having jurisdiction over disposal of sewage . . .”).

<sup>5</sup> *See* 33 U.S.C. §§ 1365(a)(1) (allowing “any citizen” to commence a civil action against “any person” alleged to be in violation of “an effluent standard or limitation. . .”), 1365(f) (defining “effluent standard or limitation” to include, among other things, “a permit or condition of a permit issued under section 1342 of this title . . .,” i.e. a NPDES permit), 1365(a) (providing the federal district court with jurisdiction, among other things, to “enforce such an effluent standard or limitation”).

occur directly in the main sewer lines or in private sewer lines, including the private sewer “laterals” that connect individual buildings to the municipal sewers.<sup>6</sup>

Inflow and infiltration cause a cascade of environmental problems because sanitary sewer systems are not designed to collect large amounts of runoff from precipitation events or to provide widespread drainage. Sanitary sewers systems are built with some allowance for extraneous flow (i.e., inflow and infiltration), but large volumes of extraneous flow cause sanitary sewers to back up and overflow or overload the treatment plant and degrade its performance.

The Board’s sanitary sewer systems play a critical role in protecting human health and the environment. The purpose of sanitary sewers is to transport wastewater uninterrupted from its source to the treatment plants associated with the two POTWs. Proper operation and maintenance of the sewers is integral to ensuring that wastewater is collected, transported, and treated at the plants. Failure to adequately maintain sewers results in: blockages, backups, and overflows of untreated sewage; underground leakage of untreated sewage into groundwater (exfiltration) and of groundwater into sewer pipes (infiltration); other forms of reduced structural integrity; reduced capacity of the collection system; and reduced treatment plant performance because of inflow and infiltration-related hydraulic overloading.

**C. Permitted and Unpermitted Discharges of Pollution from the East River POTW and West River POTW**

As noted above, the NPDES permits issued to the Board for operation of the East River and West River POTW authorize the discharge of treated sewage for certain permitted outfalls that are located at the treatment plant in each POTW. But, in addition to discharging pollution from these permitted outfalls, the Board also discharges pollution from multiple point sources not authorized by its NPDES permits. That is, there are unpermitted discharges from the two POTWs.

Unpermitted discharges are caused by the Board’s failure to properly maintain its sewer infrastructure, including its failure to prevent excessive inflow and infiltration. Excessive inflow and infiltration cause overflows from the sewer system. Frequently, such “sanitary sewer overflows,” or “SSOs,” result in discharges of pollution to waters of the United States.

The most immediate health risks associated with SSOs to waters and other areas with a potential for human contact are associated with exposure to bacteria, viruses, and other pathogens. Human health impacts occur when people become ill due to contact with water or ingestion of water or shellfish that have been contaminated by SSO discharges. In addition, sanitary sewer systems can back up into buildings, including private residences. These discharges provide a direct pathway for human contact with untreated wastewater.

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<sup>6</sup> Notifiers intend to challenge the Board’s inadequate measures to prevent excessive inflow and infiltration from entering the system through private sewer laterals as a violation of the NPDES permits. The responsibility to address inflow and infiltration from sewer laterals is part of the Board’s duty, under the NPDES permits, to properly operate and maintain the POTWs, the violation of which is discussed further below.



SSOs are a systemic problem in Gadsden. The occurrence and severity of SSOs is directly caused by the Board's neglect of the sewer infrastructure. The Board is failing to regularly and adequately inspect, clean, and maintain parts of the two POTWs, and thus allows conditions to deteriorate to the extent that blockages, pipe leaks, equipment failures, and other sewer failures occur. These conditions cause SSOs both during peak flows (i.e., during rainstorms) and in dry weather.

SSOs have been a recurring problem in Gadsden for many years. The Alabama Department of Environmental Management ("ADEM") has repeatedly sent warning letters requiring the Board to provide explanations for its systemic SSO problem. In both 2014 and 2020, the Board informed ADEM that inflow and infiltration was the source of the issue. In the Municipal Wastewater Pollution Prevention Report that the Board submitted to ADEM in 2019, the Board described its sanitary sewers as experiencing "severe" inflow and infiltration. Because its significant SSO problem is still ongoing despite years of reports from the Board to ADEM indicating that the Board's repair, management, and rehabilitation efforts are "continual," it seems evident that the Board's efforts to manage, repair and rehabilitate its systems are insufficient.

Notifiers have drawn upon data published by ADEM to develop a disturbing picture of SSOs in the East River POTW and West River POTW. Figure 1 details 80 SSOs discharged from the Board's POTWs since November 2016 that Notifiers allege have reached surface waters. Although the Board reported to ADEM that just a handful of these SSOs reached surface waters and reported the majority as discharging to a "drainage ditch" or to "ground," Notifiers have reviewed the locations of these SSOs and their volumes and, based on that information, allege that these SSOs ultimately discharged to surface waters. Figure 2 details 69 SSOs that Gadsden has discharged to groundwater. Finally, Figure 3 details the dates and locations of five SSO events that Notifiers allege occurred in Gadsden but that the Board did not report to ADEM. Notifiers have identified 154 SSO events from November 2016 to July 2021.

According to an analysis of SSOs in Gadsden commissioned by Notifiers, the rate of SSOs and the nature of these SSOs suggests a systemic inflow and infiltration problem caused by the Board's failure to properly operate and maintain the POTW. This conclusion is informed by several lines of evidence.

First, Gadsden has a very high rate of SSOs compared to most sanitary sewer systems. SSO benchmarking data compiled for the American Society of Civil Engineers and the United States Environmental Protection Agency show typical annual SSO rates averaging 4.5 SSOs/100 miles and ranging up to 9.3 SSOs/100 miles within one standard deviation.<sup>7</sup> Well maintained sewer systems should have SSO rates below or near the average of 4.5 SSOs/100 miles of sewer. But in the last six years, Gadsden's best performance was in 2017, with 8.1 SSOs/100 miles of sewer. Gadsden's average rate of SSOs from 2015 through 2020 was 10.4 SSOs/100 miles, a six-year average that falls far short of the performance metrics set by the American Society of Civil Engineers and the EPA and indicates systemic problems. The problem is worst in the West

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<sup>7</sup> Black & Veatch LLP, American Society of Civil Engineers, U.S. Environmental Protection Agency Office of Wastewater Management, Optimization of Collection System Maintenance Frequencies and System Performance, EPA Cooperative Agreement #CX 824902-01-0, February 1999.

River POTW, which routinely experiences SSO rates approaching or exceeding two standard deviations above the mean (14.1 SSOs/100miles).

Second, SSOs are not just a persistent problem in Gadsden, they often recur in the same places. For example, the Board reported 15 wet weather SSOs at 400 North 6th Street between November 18, 2015, and January 23, 2019, and additional wet weather SSOs at three nearby locations (404 North 6th Street, 406 North 6th Street, and 301 North 6th Place). Other locations of recurrent SSOs include North 11th Street, Jackson Avenue, River Road, 1884 Rainbow Drive and 515 Bryan Street. Repeated SSOs in these locations indicate that the Board has not effectively addressed locations of known hydraulic capacity limitations through rehabilitation to increase capacity or eliminate I&I.

Third, blockages of sewer pipes appear widely distributed. Of 32 blockage-related SSOs in the West River POTW reported by the Board to ADEM between 2015 and 2019, only one location (799 Tarrant Court) experienced a repeat blockage. The distribution of blockages widely throughout the West River POTW suggests that the Board is not effective in carrying out routine operation and maintenance measures, such as pipe cleaning.

A review of the Board's Municipal Wastewater Pollution Prevention Reports shows that the asset management efforts detailed are generally reactive to SSOs, pump station failures, and pipe failures. Proactive asset management is considered best practice in the sanitary sewer industry to maintain a collection system within its useful service life, prevent structural or mechanical asset failures, prevent blockages, and prevent SSOs from occurring. The Board is not following best practice standards to reduce discharges of untreated sewage. The Board's reactive approach is unacceptable to Notifiers and to residents of Gadsden generally. The Board should not wait for sewer systems to fail and for untreated sewage to run into streets, into people's homes, and into the Coosa River before acting.

The information available to Notifiers is indicative of a systemic SSO problem in Gadsden that includes, but is not limited to, the SSO incidents identified above. The systemic SSO problem is caused by the Board's inadequate investments in maintenance and repairs. The problem is long standing and, despite past assurances from the Board to ADEM and to the public, has not been adequately addressed. Notifiers intend to sue because the Board's failure to apply industry best practice standards to maintain the sewer system violates the requirement of Section 301 of the Clean Water Act that sewage discharges must use the best available technology economically achievable to reduce pollution.

Considering these problems, the Board's attention and capital investment plans should be focused on its long-neglected sewers and treatment plants. But instead, the Board is focused on a new project that will add sewage waste to its overburdened, inadequately maintained POTWs. The Board has proposed to expand the capacity of its sewer lines in the area near the airport and Steele Station Road to accommodate a proposed poultry rendering plant that would discharge more than 600,000 gallons of wastewater to the Board's overloaded sewer system every day. This is despite the fact that the sewers connecting the proposed site to the West River POTW are already capacity constrained by inflow and infiltration, which results in wet weather SSOs and

violations of numeric effluent limits at the West River sewage treatment plant's main outfall, Outfall 0011.

The Board's current practices and repeated sanitary sewer overflows violate the Clean Water Act. The Board's attention should be on fixing the problems of an overloaded and overflowing sewer system; not exacerbating them. The Board's priority should be to keep sewage out of the streets and our waterways, but instead the Board seems to be prioritizing its desire to service potential new industrial users. The Board's highest priority should be to first fix what is broken and malfunctioning within the sewer system to protect residents, provide basic, decent, and sanitary service, and cease its ongoing and severe violations of the Clean Water Act.

Given the history of sewage overflows and inadequate maintenance, as well as the Board's focus on other issues instead of these dire problems, Notifiers believe it is necessary to initiate a citizen suit. Notifiers will seek a court order requiring the Board to cease its illegal discharges of raw sewage and substantially improve the condition and management of its sewers.

**D. The Problem of Inflow and Infiltration at the West River POTW Treatment Plant**

Excessive inflow and infiltration at the West River POTW result in violations of numeric effluent limitations contained in the POTW's NPDES permit for the discharge point at the West River Wastewater Treatment Plant, Outfall 0011. In March 2018, November 2018, December 2018, December 2019, and January 2020, the Board failed to meet its required CBOD5 percent removal limitation at this outfall. In March 2020, the Board failed to meet its required TSS percent removal limitation, and in October 2019, it exceeded its permitted limit for E. coli. For each of these noncompliance periods, the Board reported that inflow and infiltration was a cause of the violation. Like the systemic SSO problem in the sanitary sewers, the issues at the West River sewage plant are caused by the Board's inadequate investments in Gadsden's sewer infrastructure.

**II.**

**STANDARDS AND LIMITATIONS ALLEGED TO HAVE BEEN VIOLATED  
AND ACTIVITIES ALLEGED TO CAUSE VIOLATIONS**

**A. Unpermitted Discharges from Sanitary Sewer Overflows**

Section 301 of the Clean Water Act prohibits "the discharge of any pollutant by any person" to waters of the United States, unless the discharge complies with various enumerated sections of the Clean Water Act.<sup>8</sup> Among other things, Clean Water Act Section 301(a) prohibits discharges not authorized by, or in violation of the terms of, a permit issued pursuant to Section

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<sup>8</sup> CWA § 301 (33 U.S.C. § 1311).



402 of the Act [i.e., a NPDES permit].<sup>9</sup> All discharges that violate Sections 301 and/or 402 of the Act are enforceable by citizens pursuant to Section 505 of the Act.<sup>10</sup>

The Clean Water Act prohibits *unpermitted discharges* – i.e., any discharge of pollutants except through the outfalls designated in a NPDES permit.<sup>11</sup> The individual NPDES permits for the East River POTW and West River POTW also prohibit the discharge of pollutants from sources not expressly authorized:

The discharge of a pollutant from a source not specifically identified in the permit application for this permit and not specifically included in the description of an outfall in this permit is not authorized and shall constitute noncompliance with this permit.<sup>12</sup>

The discharge of raw sewage into waters of the United States from SSOs constitute such prohibited discharges. The Board is liable under the Clean Water Act for its unpermitted discharges of sewage into portions of the Coosa River (including Neely Henry Lake) and its tributaries (such as Big Wills Creek and Black Creek) and adjacent wetlands, which are all Waters of the United States.

The Board has violated the above-cited terms of its NPDES permits and the Clean Water Act on all the occasions and in all the locations listed in Figures 1 and 3, below, and on other dates as well. The SSOs in Figures 1 and 3 constitute at least 85 separate violations of the Board's permits and the Clean Water Act.

Further, in Part I.C of this notice, Notifiers identified 154 SSO events in Gadsden. These are indicative of a systemic SSO problem in the POTW caused by the Board's inadequate investments in maintenance and repairs. The SSOs form a recurrent and systemic pattern of Clean Water Act violations – namely, unpermitted discharges from the East River POTW and West River POTW in violation of Section 301 of the Act. The Board is in continuing violation of the Act because the underlying causes of these SSOs – inadequate maintenance combined with excessive inflow and infiltration – are unaddressed and will cause more SSOs throughout the East River POTW and West River POTW.

## **B. Failure to Maintain Sewage Infrastructure**

As noted above, adequate maintenance and management of the Board's sanitary sewers is essential to controlling inflow and infiltration, preventing sewer overflows, and forestalling problems at the sewage treatment plants. The individual NPDES permits for the East River

<sup>9</sup> See *id.* §§ 301(a) and 402 (33 U.S.C. §§ 1311(a) and 1342).

<sup>10</sup> See CWA § 505(a) (33 U.S.C. 1365(a)) (“any citizen may commence a civil action on his own behalf ... against any person ... who is alleged to be in violation of ... an order issued by ... a State with respect to ... [an effluent standard or limitation under this chapter].”); (f)(1) (33 U.S.C. § 1365(f)(1)) (defining discharge without a permit or in violation of the conditions of a permit, either of which constitutes “an unlawful act under subsection (a) of section 1311,” as an “effluent standard or limitation” that citizens can enforce); and (f)(7) (33 U.S.C. § 1365(f)(7)) (defining a NPDES permit or a condition thereof as an “effluent standard or limitation” that citizens can enforce).

<sup>11</sup> CWA § 301 (33 U.S.C. § 1311).

<sup>12</sup> 2015 East River POTW Permit, Section II.D.I.c.; 2018 West River POTW Permit Section II.D.I.c.

POTW and West River POTW require that the Board shall, at all times, “properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of the permit.”<sup>13</sup> The permits clarify that “[p]roper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.”<sup>14</sup>

Notifiers intend to bring suit because the Board has failed to properly operate and maintain its POTWs as required by the NPDES permits.<sup>15</sup> The Board’s failure to maintain its sewer infrastructure has allowed excessive infiltration and inflow into the East River POTW and West River POTW, causing SSOs. Additionally, the Board’s improper maintenance of its systems has resulted in blockages, pipe leaks, equipment failures, and other failures that lead to SSOs. The Board’s neglect of its POTWs therefore directly violates the terms of its individual NPDES permits, which mandate proper operation and maintenance. These permit violations also violate the Clean Water Act.

### **C. Inaccurate Sanitary Sewer Overflow and Other Reporting**

The individual NPDES permits for the East River POTW and West River POTW impose several reporting requirements on the Board in the event of an SSO. For instance, the Board must report to ADEM the cause, location, and ultimate destination of each SSO.<sup>16</sup> The Board’s NPDES permits require that “The Permittee shall keep an updated record of all known wastewater discharge points that are not authorized as outfalls, including but not limited to SSOs.”<sup>17</sup> Further, the NPDES permits also state that the Board shall report to ADEM annually, for each unpermitted instance of a discharge, “the ultimate destination of the flow (e.g. surface waterbody, municipal separate storm sewer to surface waterbody).”<sup>18</sup>

The Board has failed to state the ultimate destinations of multiple SSOs reported to ADEM. The Board repeatedly reports that SSOs discharge to storm drains and drainage ditches but fails to provide the name of the surface water that receives the flow from the storm drain or drainage ditch. The failure to accurately report these SSOs constitutes a violation of the Board’s NPDES permits and the Clean Water Act. Figures 1 and 2 detail SSOs that the Board has reported as flowing to storm drains and drainage ditches without identifying the ultimate destination of the discharge. The Board has failed, and continues to fail, to describe the ultimate destinations for its discharges.

Moreover, Notifiers are informed and believe that the Board has failed to report several SSOs to ADEM at all. Notifiers have received complaints from community members of SSOs that the Board has failed to report to ADEM. This failure to report likewise constitutes a

<sup>13</sup> See 2015 East River POTW Permit, Section II.A.1; 2018 West River POTW Permit, Section II.A.1.

<sup>14</sup> *Id.*

<sup>15</sup> Notifiers intend to challenge the Board’s inadequate measures to prevent excessive inflow and infiltration from entering the system through private sewer laterals as part of the Board’s failure to properly operate and maintain the POTWs.

<sup>16</sup> See 2015 East River POTW Permit, Section I.C.2.e.5; 2018 West River POTW Permit, Section I.C.2.e.5.

<sup>17</sup> *Id.*

<sup>18</sup> *Id.*

violation of its NPDES permits and the Clean Water Act. Figure 3 details these unreported SSOs. Notifiers intend to file suit against the Board for violating these reporting requirements of the NPDES permits.

Additionally, the NPDES permits require the Board to conduct sampling for most pollutants at East River POTW Outfall 0011 and West River POTW Outfall 0011 more frequently than monthly, and report on results more frequently than monthly. But based on a review of the Board's discharge monitoring reports and non-compliance reports, it appears that the Board only reports one value per month for all such parameters. For example, at the East River POTW, Outfall 0011, the Board is required to measure and report on the daily values for flow, to sample three times weekly and report the data collected each day for E. coli and dissolved oxygen, and to sample three times weekly and report on the weekly average value for total suspended solids, various forms of nitrogen, phosphorus, and biological oxygen demand (BOD).<sup>19</sup> Similar requirements apply at the West River POTW.<sup>20</sup> However, a review of the discharge monitoring reports submitted by the Board indicates that the Board routinely provides just a single monthly value at both the East River POTW and West River POTW for each parameter that the Board is required to monitor for and report upon on a more frequent than monthly basis. Each failure to report on each parameter, at each less than monthly time interval, is a separate violation of the Clean Water Act. Notifiers intend to file suit against the Board for violating the reporting requirements of the NPDES permits related to discharges that must be sampled and reported on time scales shorter than one month.

#### **D. Groundwater Discharges**

The individual NPDES permits for the East River POTW and West River POTW prohibit the discharges of pollutants to groundwater.<sup>21</sup> To the extent that the raw sewage discharged by the Board during SSO events has actually been absorbed into the ground and failed to reach surface waters, as represented by the Board on multiple SSO reporting forms, these discharges too violate the NPDES permits for the East River POTW and West River POTW as these absorption events lead to the discharge of pollutants to groundwater. The Board has violated the above-cited terms of its NPDES permits and the Clean Water Act on all the occasions and in all the locations listed in Figure 2, below. The SSOs in Figure 2 constitute at least 69 separate violations of the Board's permits and the Clean Water Act. As noted above, SSOs in Gadsden are an ongoing and systemic problem and thus the Board's illegal discharges of pollutants to groundwater are an ongoing and continuous violation of the NPDES permits and the Clean Water Act. Notifiers intend to file suit against the Board for violating these limitations found in the NPDES permits.

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<sup>19</sup> See 2015 East River POTW Permit, Section I.A.1 and I.C.1.

<sup>20</sup> See 2018 West River POTW Permit, Section I.A.1 and I.C.1 (requiring daily calculation and reporting of flow, two day per week sampling and daily value reporting for dissolved oxygen, pH, chlorine, and E.coli, and two day per week sampling and weekly value reporting for suspended solids, nitrogen (total ammonia and total Kjeldahl various forms), and biological oxygen demand.

<sup>21</sup> See 2015 East River POTW Permit, Section III.G; 2018 West River POTW Permit, Section III.G.



**E. Violations of Water Quality Standards**

The Board's sanitary sewer overflows also violate the Board's NPDES permits because these discharges cause or contribute to violations of water quality standards set by the State of Alabama to protect the waters in and around Gadsden. The Clean Water Act requires that NPDES permits shall contain effluent limitations that will assure compliance with water quality standards.<sup>22</sup> EPA regulations states that such effluent limitations must be established for any discharge that may cause or contribute to a violation of water quality standards.<sup>23</sup> The effluent limits in the Board's NPDES permits include a prohibition on SSOs – compliance with this limit is necessary to assure compliance with water quality standards. Any SSO that causes or contributes to a violation of water quality standards at the point of discharge violates the terms of the relevant NPDES permit and the Clean Water Act.

As part of its water quality standards, Alabama sets numeric and narrative criteria for different water pollution parameters. A waterbody must meet these numeric and narrative criteria to support its designated uses. Waters whose use is designated by ADEM as "Fish and Wildlife" must be "suitable for fish, aquatic life and wildlife propagation."<sup>24</sup> Fish and Wildlife waters must meet several specific criteria. Sewage that is not effectively controlled under the ADEM waste treatment requirements is prohibited from reaching such waters.<sup>25</sup> Additionally, in non-coastal "Fish and Wildlife" waters, "bacteria of the E. coli group shall not exceed a geometric mean of 548 colonies/100 ml; nor exceed a maximum of 2,507 colonies/100 ml in any sample."<sup>26</sup>

Waters whose use is designated by ADEM as "Public Water Supply" may be used for drinking and food-processing purposes if subjected to ADEM-approved treatment.<sup>27</sup> Such waters may also be used for swimming and other whole body water-contact sports.<sup>28</sup> Sewage that is not effectively controlled under the ADEM waste treatment requirements is also prohibited from reaching these waters.<sup>29</sup> Additionally, in non-coastal Public Water Supply waters, "bacteria of the E. coli group shall not exceed a geometric mean of 548 colonies/100 ml; nor exceed a maximum of 2,507 colonies/100 ml in any sample," and, for incidental water contact and whole body water-contact recreation during the months of May through October, the geometric mean E. coli density "may not exceed 126 colonies/100 ml nor exceed a maximum of 298 colonies/100 ml in any single sample in non-coastal waters."<sup>30</sup>

Notifiers are informed and believe that the Board's SSOs listed in Figure 1 contain sewage that is not effectively controlled under ADEM waste treatment requirements and that these sewage discharges contain E. coli in concentrations that exceed the above-listed concentrations for Fish and Wildlife and Public Water Supply waters.

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<sup>22</sup> CWA § 402(a)(1) (33 U.S.C. § 1342(a)(1)) (referencing CWA § 302 (33 U.S.C. § 1312)).

<sup>23</sup> 40 C.F.R. § 122.44(d).

<sup>24</sup> ADEM Rule 335-6-10-.09(5)(b).

<sup>25</sup> ADEM Rule 335-6-10-.09(5)(e)(1).

<sup>26</sup> ADEM Rule 335-6-10-.09(5)(e)(7)(i).

<sup>27</sup> ADEM Rule 335-6-10-.09(2)(b).

<sup>28</sup> ADEM Rule 335-6-10-.09(2)(d).

<sup>29</sup> ADEM Rule 335-6-10-.09(2)(e)(1).

<sup>30</sup> ADEM Rule 335-6-10-.09(2)(e)(7).

The Board's SSOs have reached a segment of the Coosa River designated as a Fish and Wildlife water. Specifically, the portion of the river from McCardney's Ferry to the City of Gadsden's water supply intake has been designated by ADEM as a Fish and Wildlife water.<sup>31</sup> The Board's SSOs have caused untreated sewage to flow into this Fish and Wildlife waterbody. These SSOs thus violate the prohibition against the introduction of untreated sewage into Fish and Wildlife waterbodies and have violated the numeric standard related to *E. coli*, as there is no mixing zone at the point where the SSO reaches the Coosa River.

The Board's SSOs have also reached a segment of the Coosa River designated as a Public Water Supply water. Specifically, the portion of the river from City of Gadsden's water supply intake to the Weiss Dam powerhouse has been designated by ADEM as a Public Water Supply water.<sup>32</sup> The Board's SSOs have caused untreated sewage to flow into this Public Water Supply waterbody. These SSOs thus violate the prohibition against the introduction of untreated sewage into Public Water Supply waterbodies and have violated the numeric standard related to *E. coli*, as there is no mixing zone at the point where the SSO reaches the Coosa River.

The Board's SSOs also have contributed to the impairment of two different tributaries of the Coosa River. Both Black Creek and Big Wills Creek are Fish and Wildlife waters, are impaired for nutrients, and therefore have been placed on Alabama's 303(d) list of impaired waterbodies.<sup>33</sup> The Board's SSOs have reached these creeks, thereby adding excess nutrients to these waters and contributing to their continuing impairment.

Further, the entirety of Neely Henry Lake is designated as impaired by the State of Alabama due to nutrients; organic enrichment; high levels of oxygen demanding pollutants (measured as CBOD and NBOD) and resulting low dissolved oxygen levels; pH; and PCBs.<sup>34</sup> ADEM has prepared Total Maximum Daily Loads for Neely Henry Lake – plans that strictly limit the quantity of nutrients and other wastes that can be discharged into the lake. The plans note that sanitary sewer overflows can be significant sources of organic loading to Neely Henry Lake.<sup>35</sup> The plans determine the quantity or load of nutrients from sewage and other sources that can be discharged to the lake and allocate that load across different sewage plants and other sources. There is no allocation for sanitary sewer overflows. Every sanitary sewer overflow from the Board's POTWs that reaches any part of Neely Henry Lake violates the TMDL and contributes to the ongoing nutrient, organic enrichment, and dissolved oxygen impairments in the lake, thus violating both the terms of the NPDES permits and the Clean Water Act.

Finally, Alabama has adopted water quality standards for sewage discharges that apply to all waters in and around Gadsden at all times. This necessarily includes the nutrient impaired

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<sup>31</sup> ADEM Rule 335-6-11-.02(8).

<sup>32</sup> *Id.*

<sup>33</sup> 2020 Alabama §303(d) List, ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT, 6 (2020), <https://adem.alabama.gov/programs/water/wquality/2020AL303dList.pdf>.

<sup>34</sup> See, e.g., ADEM, "FINAL Total Maximum Daily Loads (TMDLs) for Neely Henry Lake (Nutrients, OE/DO & pH), Logan Martin Lake (Nutrients & OE/DO), Lay Lake (Nutrients & OE/DO), Mitchell Lake (Nutrients)" 2008 (<http://adem.alabama.gov/programs/water/wquality/tmdls/FinalCoosaLakesTMDLReport.pdf>).

<sup>35</sup> *Id.* at 21.

waters of Neely Henry Lake, Big Wills Creek, and Black Creek. These standards, codified at Section 335-6-10-.06(a)-(c) of the Alabama Administrative Code (2020), provide that:

- (a) State waters shall be free from substances attributable to sewage . . . that settle in forming bottom deposits which are unsightly, putrescent or interfere directly or indirectly with any classified water use.
- (b) State waters shall be free from floating debris, oil, scum, and other floating materials attributable to sewage . . . in amounts sufficient to be unsightly, or which interfere directly or indirectly with any classified water use.
- (c) State waters shall be free from substances attributable to sewage. . . in concentrations or combinations, which are toxic or harmful to human, animal, or aquatic life to the extent commensurate with the designated usage of such waters.

Many of the Board's sanitary sewer overflows violate these standards by causing unsightly bottom deposits and unsightly floating debris and scum on waters around Gadsden. And all of the Board's SSOs that reach Neely Henry Lake, Big Wills Creek, or Black Creek necessarily violate this standard by contributing to the existing impairments that, by definition, interfere with the designated uses of these waters. Thus, all of the Board's SSOs that reach a surface water are discharges that cause or contribute to a violation of several different water quality standards in all receiving waters, including but not limited to the impaired waters of Neely Henry Lake (the Coosa River), Black Creek and Big Wills Creek. And therefore, all of the Board's SSOs violate the Board's NPDES permits – which prohibit SSOs and any other discharges that cause or contribute to violations of water quality standards – and violate the Clean Water Act.

#### **F. Numeric Effluent Limit Violations at the West River POTW Treatment Plant**

As mentioned above, the Board has violated, and continues to violate, the CWA and its NPDES permit for the West River POTW whenever it fails to meet the numeric effluent limitations established for its sewage treatment plant outfall, Outfall 0011, in Part I of the West River NPDES permit. In March 2018, November 2018, December 2018, October 2019, December 2019, and January 2020, the Board failed to meet its required CBOD5 percent removal limitation at the West River POTW; in March 2020, the Board failed to meet its required TSS percent removal limitation; and in October 2019, it exceeded its permitted limit for e. coli. Each noncompliance event is a violation of the terms of the West River NPDES permit and of the Clean Water Act. The below figure details each noncompliance event:

<b>Date</b>	<b>Parameter</b>	<b>Outfall</b>	<b>Effluent Limitation</b>	<b>Sample Result</b>
March 2018	CBOD5 Percent Removal	0011	85%	80%



November 2018	CBOD5 Percent Removal	0011	85%	84%
December 2018	CBOD5 Percent Removal	0011	85%	83%
October 2019	E. Coli	0011	298 col/100mL	1966 col/100mL
December 2019	CBOD5 Percent Removal	0011	85%	82%
January 2020	CBOD5 Percent Removal	0011	85%	80%
March 2020	TSS Percent Removal	0011	85%	81.40%

As noted above, the Board has attributed these effluent limit violations to excessive inflow and infiltration. Accordingly, the violations of numeric effluent limitations at the West River treatment plant, Outfall 0011, are continuing violations of the NPDES permit and the Clean Water Act and will continue as long as inflow and infiltration remain a problem in Gadsden.

### III.

#### **PERSONS RESPONSIBLE FOR ALLEGED VIOLATIONS**

The person responsible for the violations alleged in this Notice is The Water Works and Sewer Board of the City of Gadsden (“the Board”). The Board is a municipal corporation of the City of Gadsden, a “municipality” as defined in section 502(4) of the Act, 33 U.S.C. § 1362(4), incorporated under the laws of the State of Alabama.

Notifiers hereby put the Board on notice that if Notifiers subsequently identify additional persons as also being responsible for the violations set forth above, Notifiers intend to include those persons in this action.

### IV.

#### **LOCATION OF THE ALLEGED VIOLATION**

The violations alleged in this Notice have occurred and continue to occur throughout the East River POTW and West River POTW, at all points where inflow and infiltration enter the POTWs, at the treatment plants associated with the POTWs, at the unpermitted discharge points from the POTWs identified above in Part II.A and in Figures 1-3 below, and at all other unpermitted sanitary sewer overflow points from which discharges of pollution from the POTWs have reached waters of the United States and/or groundwater. The failures to accurately report SSOs are violations occurring in general and in the inadequate reports themselves.

## V.

**DATES OF VIOLATION**

First, every day upon which the Board fails to properly operate and maintain the East River POTW is a separate violation of CWA Section 301(a) and the Board's individual NPDES permit. Similarly, each such day is a separate day of violation with respect to the West River POTW.

Second, the violations noted in Part II. A of this Notice relating to unpermitted discharges from the East River POTW and West River POTW have occurred during all instances of sanitary sewer overflows that reach waters of the United States and/or groundwater. The Board is better positioned than Notifiers to comprehensively catalogue all dates on which such violations have occurred, but based on public reporting of sanitary sewer overflows, as well as Notifiers' own observations, Notifiers can inform the Board that such violations have occurred on at least the dates provided in Figures 1, 2, and 3. These SSO violations will continue to recur at points throughout the East River POTW and West River POTW, and thus are ongoing.

Third, the Board has violated its NPDES permits and the Clean Water Act each time it fails to comply with the reporting requirements of its permits. Notifiers allege that the Board has failed to accurately report its SSOs on numerous occasions, including the dates in Figure 1 describing SSOs that flow to drainage ditches and storm drains where the Board has not provided the ultimate destination of the discharge, and including the dates in Figure 3, which describe SSOs that the Board has failed to report to ADEM. Further, with respect to the allegations above that the Board has failed to properly monitor and report on its discharges of pollutants at both the East River POTW and the West River POTW that must be sampled and reported on time scales shorter than one month, Notifiers allege that these violations have occurred at each POTW in every month since November 2016. These particular violations will continue until the Board corrects its inaccurate reports in these instances, and these violations form a recurring and continuing pattern of non-compliance both as to the SSO reporting requirements and the more-frequently-than-monthly reporting requirements for pollutants at Outfalls 0011 at the East River and West River POTWs.

Fourth, the Board violates its NPDES permits and the Clean Water Act on each day of each recordkeeping period in which the Board fails to comply with the numeric effluent limitations in its permits, including the effluent limitations for Outfall 0011 at the West River POTW. Notifiers allege that these violations have occurred on all days in March 2018, November 2018, December 2018, December 2019, January 2020, and March 2020, and form a recurring and thus continuing pattern of numeric effluent limit violations.

Fifth, the Board has violated its NPDES permits and the Clean Water Act each time it discharges raw sewage that cause or contribute to exceedances of the applicable water quality standards. Notifiers allege that these violations have occurred every day that the Board's unpermitted discharges reach surface waters (specifically, all dates specified in Figures 1 and 3), and are continuing.

The Board is liable for the above-described violations occurring prior to the date of this letter, and for every day after the date of this letter that these violations continue. In addition to the violations set forth above, this Notice covers all violations of the CWA evidenced by information that becomes available to Notifiers after the date of this Notice.<sup>36</sup> All of the above violations are ongoing and barring full compliance with the permitting requirements of the Clean Water Act – which will require removal of significant volumes of I&I from the Board's sewer system – these violations will continue.

## VI.

### **RELIEF REQUESTED**

Notifiers will ask the court to order the Board to comply with the CWA, to pay penalties, and to pay Notifiers' costs and legal fees.

First, Notifiers will seek declaratory relief and injunctive relief to prevent further violations of the Clean Water Act pursuant to Sections 505(a) and (d) and such other relief as permitted by law. In particular, Notifiers will seek an injunction requiring the Board to comply with the terms of its permits, to stop sanitary sewer overflows and to significantly increase the rate of repairs and rehabilitation, improve its operations and maintenance practices, and take all other measures necessary to remove inflow and infiltration from the East and West River POTWs. These changes are necessary to stop sewer overflows, achieve compliance with the terms of the Board's NPDES permits, and protect the waters of the Coosa River and its tributaries.

Second, pursuant to Section 309(d) of the CWA, each separate violation of the CWA subjects the Board to a penalty not to exceed \$56,460 per day for each violation.<sup>37</sup>

Third and lastly, pursuant to Section 505(d) of the CWA, Notifiers will seek recovery of litigation fees and costs (including reasonable attorney and expert witness fees) associated with this matter.<sup>38</sup>

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<sup>36</sup> See, e.g., *Public Interest Research Grp. v. Hercules, Inc.*, 50 F.3d 1239, 1248-49 (3d Cir.1995) (a notice that adequately identifies specific violations to a potential defendant also covers repeated and related violations that the plaintiff learns of later. "For example, if a permit holder has discharged pollutant 'x' in excess of the permitted effluent limit five times in a month but the citizen has learned only of four violations, the citizen will give notice of the four violations of which the citizen then has knowledge but should be able to include the fifth violation in the suit when it is discovered.").

<sup>37</sup> 33 U.S.C. § 1319(d); see also 40 C.F.R. § 19.4 (Adjustment of Civil Monetary Penalties for Inflation).

<sup>38</sup> 33 U.S.C. § 1365(d).



**VII.**

**PERSONS GIVING NOTICE**

The full name, address, and telephone number of the persons giving notice are as follows:

Coosa Riverkeeper  
102-B Croft St.  
Mt Laurel, AL 35242  
(205) 981-6565

Center for Biological Diversity  
P.O. Box 710  
Tucson, AZ 85702-0710  
(520) 623-5252

Advance Etowah  
3331 Rainbow Drive, Suite E,  
PMB 107  
Rainbow City, AL 35906  
(256) 467-7010

Our Children's Earth Foundation  
1625 Trancas St. #2218  
Napa, CA 94558-9998  
(510) 910-4535

**VIII.**

**IDENTIFICATION OF COUNSEL**

Notifiers are represented by legal counsel in this matter. The name, address, and telephone number of Notifiers' attorneys are:

Edan Rotenberg  
Benjamin Pierce  
Super Law Group, LLC  
110 Wall Street  
New York, New York 10005  
(212) 242-2355

Christie D. Knowles, Esq. (KNO015)  
Megan Phillips Huizinga, Esq. (PHI091)  
Knowles & Sullivan, LLC  
413 Broad Street  
Gadsden, AL 35901  
256-547-7200

Hannah Connor  
Center for Biological Diversity  
1411 K Street NW, Suite 1300  
Washington, DC 20005  
(202) 681-1676

**XI.**

**CONCLUSION**

The foregoing provides more than sufficient information to permit the Board to identify the specific standard, limitation, or order alleged to have been violated, the activities alleged to constitute violations, the person or persons responsible for the alleged violations, the locations of the alleged violation, the date or dates of such violations, and the full name, address, and telephone number of the persons giving notice.<sup>39</sup>

During the sixty-day notice period, Notifiers are willing to discuss effective remedies for the violations noted in this letter that may avoid the necessity of protracted litigation. If the Board wishes to pursue such discussions, please contact the undersigned attorney immediately. We do not intend to delay the filing of a complaint in federal court, regardless of whether discussions are continuing at the conclusion of the sixty days.

Very truly yours,



Edan Rotenberg  
Super Law Group, LLC  
110 Wall Street  
New York, New York 10005  
(212) 242-2355

Hannah Connor  
Center for Biological Diversity  
1411 K Street NW, Suite 1300  
Washington, DC 20005  
(202) 681-1676

Christie Knowles (KNO015)  
Megan Phillips Huizinga (PHI091)  
Knowles & Sullivan, LLC  
413 Broad Street  
Gadsden, AL 35901  
(256) 547-7200

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<sup>39</sup> 40 C.F.R. §§ 135.3(a), 254.3(a).

cc:

Michael S. Regan, Administrator  
Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460  
regan.michael@epa.gov  
(via certified mail, return receipt and e-mail)

John Blevins, EPA Region 4 Acting Administrator  
U.S. EPA Region 4  
Sam Nunn Atlanta Federal Center  
61 Forsyth Street, SW  
Atlanta, GA 30303-8960  
blevins.john@epa.gov  
(via certified mail, return receipt and e-mail)

Lance R. LeFleur, Director  
Alabama Department of Environmental Management  
1400 Coliseum Boulevard  
Montgomery, AL 36110-2400  
llefleur@adem.alabama.gov  
(via certified mail, return receipt and e-mail)

Congressman Robert B. Aderholt  
600 Broad St. Ste. 107  
Gadsden, AL 35901

Sen. Andrew Jones  
11 S. Union St. Ste. 733  
Montgomery, AL 36130

Rep. Craig Lipscomb  
11 S. Union St. Ste. 526-D  
Montgomery, AL 36130

Rep. Gill Isbell  
11 S. Union St. Ste. 434  
Montgomery, AL 36130



**Figure 1: SSOs Alleged to Discharge to Surface Waters**

POTW	Start Date	Volume (gal)	Location	Latitude	Longitude	Destination of Discharge as reported to ADEM by Gadsden	Alleged Destination of Discharge
East River POTW	6/23/17	360	1124 Stillman Ave.	34.0009	-85.9807	Storm Drain	Coosa River
East River POTW	12/14/17	180	1115 Stillman Ave	34.00094	-85.980786	Storm Drain	Coosa River
East River POTW	3/2/18	20	409 Herzberg Circle	34.0036	-85.9927	Ground Absorbed	Coosa River
East River POTW	12/9/18	3600	499 7th St S	34.002313	-85.991073	Ground Absorbed	Coosa River
East River POTW	12/28/18	6000	703 George Wallace Dr	33.999664	-85.993347	Ground Absorbed	Coosa River
East River POTW	12/28/18	4800	499 7th St S	34.002308	-85.991062	Ground Absorbed	Coosa River
East River POTW	1/4/19	7800	499 S 7th St	34.002313	-85.991073	Ground Absorbed, Drainage Ditch	Coosa River
East River POTW	1/19/19	3600	701 George Wallace Drive	33.999634	-85.993408	Ground Absorbed	Coosa River
East River POTW	2/19/19	4500	701 George Wallace Drive	33.999634	-85.993408	Ground Absorbed	Coosa River
East River POTW	2/21/19	1,000 ≥ gallons <10,000	701 George Wallace Drive	33.999634	-85.993408	Ground Absorbed	Coosa River
East River POTW	2/22/19	1,000 ≥ gallons <10,000	701 George Wallace Drive	33.999634	-85.993408	Ground Absorbed	Coosa River
East River POTW	3/24/21	3750	509 College Parkway	33.971727	-85.965201	Ground Absorbed	Coosa River
West River POTW	11/2/16	1800	4644 Airport Rd	33.9872	-86.0784	Ground Absorbed, Drainage Ditch	Big Wills Creek
West River POTW	12/7/16	540	301 S 11th St	34.0157	-86.0181	Storm Drain	Coosa River
West River POTW	12/21/16	540	101 Commerce Pkwy	33.9965	-86.0706	Ground Absorbed	Big Wills Creek

West River POTW	1/23/17	2400	92 River Rd.	33.9947	-86.0022	Ground Absorbed	Coosa River
West River POTW	1/23/17	720	124 River Rd.	33.9947	-86.0022	Ground Absorbed	Coosa River
West River POTW	4/3/17	1800	94 River Rd	33.9934	-86.0012	Ground Absorbed	Coosa River
West River POTW	4/3/17	1440	400 N. 6th St.	34.0185	-86.0054	Drainage Ditch	Coosa River
West River POTW	5/15/17	540	338 Howell Cir	34.0148	-86.0693	Ground Absorbed	Big Wills Creek
West River POTW	5/24/17	720	400 N. 6th St.	34.0185	-86.0054	Drainage Ditch	Coosa River
West River POTW	6/14/17	400	Manhole #517 901 Rainbow Drive	33.9897	-86.0027	Storm Drain	Coosa River
West River POTW	6/28/17	5700	4698 Airport Rd.	33.9836	-86.0784	Ground Absorbed, Drainage Ditch	Big Wills Creek
West River POTW	6/30/17	1800	430 N. 6th St.	34.0186	-86.0055	Drainage Ditch	Coosa River
West River POTW	11/20/17	7600	4699 Airport Rd.	33.984963	-86.078638	Ground Absorbed, Drainage Ditch	Big Wills Creek
West River POTW	12/20/17	540	400 N. 6th St	34.018818	-86.00554	Drainage Ditch	Coosa River
West River POTW	2/7/18	720	400 N. 6th Street	34.018576	-86.005451	Drainage Ditch	Coosa River
West River POTW	2/11/18	1800	400 N. 6th St.	34.018579	-86.005447	Drainage Ditch	Coosa River
West River POTW	2/13/18	600	905 Brookside Dr.	34.025731	-86.004042	Ground Absorbed, Drainage Ditch	Coosa River
West River POTW	2/13/18	1440	1282 Rainbow Drive	33.984223	-86.004986	Ground Absorbed, Drainage Ditch	Coosa River
West River POTW	5/2/18	720	702 Tarrant Ct.	34.018349	-86.007709	Ground Absorbed	Coosa River
West River POTW	5/16/18	9000	4689 Airport Rd.	33.983593	-86.079006	Ground Absorbed	Big Wills Creek
West River POTW	6/19/18	180	2312 Sansom Ave.	34.021813	-86.039014	Storm Drain	Black Creek



West River POTW	8/8/18	4320	2200 Industrial Avenue	34.024626	-86.037287	Ground Absorbed	Black Creek
West River POTW	9/27/18	360	1323 Jackson Ave., MH#4595	34.003303	-86.035428	Ground Absorbed	Black Creek
West River POTW	11/12/18	600	23 River Road	33.991116	-86.002677	Ground Absorbed	Coosa River
West River POTW	11/12/18	1800	93 River Road	33.993492	-86.001231	Coosa River, Lake Neely Henry	Coosa River
West River POTW	12/1/18	180	400 N. 6th St.	34.018576	-86.005451	Ground Absorbed	Coosa River
West River POTW	12/8/18	4200	400 N 6th St	34.018576	-86.005451	Ground Absorbed	Coosa River
West River POTW	12/28/18	180	1329 Jackson Ave.	34.0033	-86.035429	Ground Absorbed, Drainage Ditch	Black Creek
West River POTW	12/28/18	2400	404 N. 6th St.	34.018822	-86.005534	Ground Absorbed, Drainage Ditch	Coosa River
West River POTW	12/28/18	300	AL - 759 E	33.993507	-86.001185	Ground Absorbed	Coosa River
West River POTW	1/4/19	3150	400 N 6th Street	34.018576	-86.005451	Ground Absorbed	Coosa River
West River POTW	1/19/19	1950	400 N. 6th St.	34.018576	-86.005451	Ground Absorbed	Coosa River
West River POTW	1/23/19	3900	400 N. 6th St	34.018576	-86.005451	Ground Absorbed, Drainage Ditch	Coosa River
West River POTW	2/17/19	2520	406 N. 6th Street	34.018938	-86.005605	Ground Absorbed, Storm Drain	Coosa River
West River POTW	2/19/19	8400	4688 Airport Road	33.9836	-86.078462	Ground Absorbed	Big Wills Creek
West River POTW	2/19/19	10,000 ≥ gallons < 25,000	406 N. 6th Street	34.018938	-86.005605	Ground Absorbed, Storm Drain	Coosa River
West River POTW	2/21/19	450	1324 Jackson Avenue	34.003326	-86.035375	Ground Absorbed, Drainage Ditch	Black Creek
West River POTW	2/21/19	900	4688 Airport Road	33.9836	-86.078462	Ground Absorbed	Big Wills Creek



West River POTW	2/22/19	750	1324 Jackson Avenue	34.003326	-86.035375	Ground Absorbed, Drainage Ditch	Black Creek
West River POTW	10/25/19	8325	402 N 11th Street	34.002364	-86.017063	Ground Absorbed	Coosa River
West River POTW	10/25/19	5325	301 N 6th Pl	34.018569	-86.005405	Ground Absorbed	Coosa River
West River POTW	12/22/19	9200	301 N 6th Place	34.018569	-86.005405	Ground Absorbed	Coosa River
West River POTW	12/23/19	1400	4688 Airport Road	33.9836	-86.078462	Ground Absorbed	Big Wills Creek
West River POTW	12/23/19	4875	1884 Rainbow Drive	33.975872	-86.009752	Ground Absorbed	Coosa River
West River POTW	2/6/20	7700	301 N 6th Place	34.018569	-86.005405	Ground Absorbed	Coosa River
West River POTW	2/20/20	450	103 Goldenrod Ave	34.038836	-85.973911	Ground Absorbed	Coosa River
West River POTW	2/21/20	250	204 Waterford Lane	33.986998	-86.020348	Ground Absorbed	Coosa River
West River POTW	2/20/20	6450	406 N 6th St	34.018936	-86.005628	Ground Absorbed	Coosa River
West River POTW	2/21/20	25,000 < 50,000 gal	1884 Rainbow Drive	33.977	-86.008813	Coosa River	Coosa River
West River POTW	2/25/20	6000	1884 Rainbow Drive	33.977	-86.008813	Coosa River	Coosa River
West River POTW	3/5/20	6600	406 N 6th St	34.018936	-86.005628	Ground Absorbed	Coosa River
West River POTW	3/5/20	25,000 < 50,000	1884 Rainbow Drive	33.977	-86.008813	Coosa River	Coosa River
West River POTW	4/2/20	1670	2816 Forrest Avenue	34.018416	-86.048041	Ground Absorbed	Black Creek
West River POTW	4/2/20	8870	153 S 29th Street	34.018458	-86.048989	Ground Absorbed	Black Creek
West River POTW	9/4/20	930	1113 Tidmore Bend Road	34.025801	-85.960508	Ground Absorbed	Coosa River

West River POTW	10/16/20	< 1,000 gal	Manhole before Pump Station	34.000631	-86.08755	Ground Absorbed	Big Wills Creek
West River POTW	11/2/20	30000	970 Hadwen Street	34.032706	-85.964387	Ground Absorbed, Drainage Ditch	Coosa River
West River POTW	12/7/20	1800	25 Lakefront Avenue	34.024642	-86.037262	Ground Absorbed, Drainage Ditch	Black Creek
West River POTW	12/24/20	1,000 < gallons ≤ 10,000	4688 Airport Road, MH #133	33.9836	-86.078462	Ground Absorbed	Big Wills Creek
West River POTW	1/26/21	840	1811 Truman Street	34.00225	-86.032111	Ground Absorbed	Black Creek
West River POTW	2/1/21	300	273 Walker St	34.000627	-86.087543	Ground Absorbed	Big Wills Creek
West River POTW	2/26/21	2250	408 N 30th Street	34.023061	-86.051659	Ground Absorbed, Storm Drain	Black Creek
West River POTW	3/1/21	800	111 Lakepoint Drive	33.982117	-86.00755	Ground Absorbed	Coosa River
West River POTW	3/25/21	< 1,000 gal	4688 Airport Road; Manhole #133	33.9836	-86.078462	Ground Absorbed	Big Wills Creek
West River POTW	3/30/21	9000	4134 Brooke Avenue	34.000844	-86.074344	Ground Absorbed	Big Wills Creek
West River POTW	3/31/21	6300	108 S 21st Street	34.019116	-86.032874	Ground Absorbed	Black Creek
West River POTW	3/31/21	2562	200 Princeton Avenue	34.031671	-85.978251	Ground Absorbed	Coosa River
West River POTW	3/31/21	3660	327 Princeton Avenue	34.031717	-85.976045	Ground Absorbed	Coosa River



**Figure 2: SSOs Discharged to Groundwater**

POTW	Start Date	Volume of Release (gal)	Location	Latitude	Longitude	Destination of Discharge as reported to ADEM by Gadsden
East River POTW	12/4/16	2880	1125 Bonton Ave., Gadsden, Al	33.9965	-85.9611	Drainage Ditch
East River POTW	1/27/17	3600	1407 Rhea St., Gadsden, Al	33.9965	-85.9602	Drainage Ditch
East River POTW	3/9/17	6600	1407 Rhea St., Gadsden, Al	33.9965	-85.9601	Drainage Ditch
East River POTW	4/3/17	1440	2803 E. Broad St., Gadsden, Al	33.977	-85.9544	Drainage Ditch
East River POTW	4/5/17	540	2803 E. Broad St., Gadsden, Al	33.977	-85.9544	Drainage Ditch
East River POTW	4/10/17	180	608 Magnolia Ave., Gadsden, Al	33.9905	-85.9889	Ground Absorbed
East River POTW	5/19/17	60	610 Magnolia Ave., Gadsden, Al	33.9905	-85.9889	Ground Absorbed
East River POTW	6/28/17	1200	1400 Poplar St.	33.9965	-85.9611	Drainage Ditch
East River POTW	7/24/17	120	100 20th St. N, Gadsden, Al	33.992	-85.9718	Ground Absorbed, Drainage Ditch
East River POTW	8/11/17	240	1124 Bonton Ave	33.9966	-85.9612	Drainage Ditch
East River POTW	3/24/18	900	860 Goodyear Ave	34.009556	-85.973074	Ground Absorbed
East River POTW	6/25/18	300	235 Riverside Drive	33.985641	-85.988189	Ground Absorbed
East River POTW	8/24/18	240	608 Magnolia Ave	33.990525	-85.988986	Ground Absorbed
East River POTW	12/28/18	2400	2822 E Broad St	33.977101	-85.954473	Ground Absorbed
East River POTW	1/18/19	1200	1798 Woodside Avenue	33.993908	-85.949837	Ground Absorbed
East River POTW	3/1/19	900	3201 Gurley Avenue	33.969456	-85.949946	Ground Absorbed



East River POTW	10/16/19	125	1102 Raley Street	34.000933	-85.964283	Ground Absorbed
East River POTW	10/25/19	1890	3211 Calhoun Drive	33.969376	-85.952183	Ground Absorbed
East River POTW	10/30/19	1525	3211 Calhoun Drive	33.969376	-85.952183	Ground Absorbed
East River POTW	10/31/19	510	103 Margaret Street	33.975722	-85.954149	Ground Absorbed
East River POTW	12/22/19	4800	103 Margaret Street	33.975722	-85.954149	Ground Absorbed
East River POTW	1/2/20	4800	103 Margaret Street	33.975722	-85.954149	Ground Absorbed
East River POTW	2/6/20	500	123 Brookwood Street	33.997008	-85.974159	Ground Absorbed
East River POTW	6/17/20	250	225 Riverside Drive	33.985978	-85.988222	Ground Absorbed
East River POTW	10/28/20	900	2822 East Broad Street	33.977101	-85.954448	Ground Absorbed
East River POTW	10/28/20	5360	977 Gray Road	33.974288	-85.955308	Ground Absorbed
East River POTW	10/28/20	3600	2818 Fields Avenue	33.977405	-85.953169	Ground Absorbed
East River POTW	3/31/21	600	1102 Slusser Avenue	34.002083	-85.978421	Ground Absorbed
East River POTW	4/26/21	250	1336 Merrhyll Avenue	33.991243	-85.984217	Ground Absorbed
West River POTW	4/3/17	1440	405 N. 11th St.	34.0225	-86.017	Drainage Ditch
West River POTW	4/11/17	600	405 N. 11th St.	34.0225	-86.0174	Ground Absorbed, Drainage Ditch
West River POTW	4/13/17	180	31 Cabot Ave.	34.0305	-86.0433	Ground Absorbed
West River POTW	12/20/17	3600	515 Bryan St	34.011566	-86.061387	Drainage Ditch
West River POTW	12/20/17	540	401 N 11th St	34.022503	-86.017078	Drainage Ditch

West River POTW	2/7/18	720	408 N. 11th Street	34.02241	-86.017082	Drainage Ditch
West River POTW	2/8/18	1200	199 Silvey St., Rainbow City, AL	33.959398	-86.034912	Drainage Ditch
West River POTW	2/11/18	1800	401 N. 11th St.	34.022406	-86.01707	Drainage Ditch
West River POTW	2/11/18	4800	515 Bryan St. Pump Station	34.011572	-86.061386	Drainage Ditch
West River POTW	6/28/18	1200	597 Van del Blvd.	34.011204	-86.053899	Ground Absorbed, Drainage Ditch
West River POTW	7/4/18	100	Rosemount Pump Station, 3800 Roselawn Drive, Gadsden, AL 35904	34.0198	-86.0659	Ground Absorbed
West River POTW	12/29/18	1200	2476 Chestnut St.	34.015184	-86.041939	Ground Absorbed, Drainage Ditch
West River POTW	1/4/19	1500	400 N 11th Street	34.022393	-86.017098	Ground Absorbed, Drainage Ditch
West River POTW	1/19/19	7800	408 N. 11th St.	34.022393	-86.017098	Ground Absorbed, Drainage Ditch
West River POTW	1/23/19	9450	408 N. 11th St	34.022393	-86.017098	Ground Absorbed, Drainage Ditch
West River POTW	1/24/19	150	28 Cabot Avenue	34.030287	-86.042376	Ground Absorbed
West River POTW	2/17/19	9600	404 N. 11th Street	34.022398	-86.017107	Ground Absorbed, Drainage Ditch
West River POTW	2/19/19	25,000 ≥ gallons <50,000	404 N. 11th Street	34.022398	-86.017107	Ground Absorbed, Drainage Ditch
West River POTW	5/31/19	50	Morningview Drive	34.044215	-85.954667	Ground Absorbed
West River POTW	6/5/19	75	419 Roslyn Drive	34.044995	-85.954333	Ground Absorbed
West River POTW	10/25/19	315	419 Roslyn Drive	34.044575	-85.954022	Ground Absorbed
West River POTW	12/4/19	3150	912 Willow Street	34.009409	-86.02343	Ground Absorbed



West River POTW	12/22/19	7875	402 N 11th Street	34.022364	-86.017063	Ground Absorbed
West River POTW	12/23/19	2660	515 Bryan Street	34.011571	-86.061395	Ground Absorbed
West River POTW	2/6/20	9175	402 N 11th St	34.022364	-86.017063	Ground Absorbed
West River POTW	2/10/20	6780	402 N 11th Street	34.022364	-86.017063	Ground Absorbed
West River POTW	2/20/20	8000	402 N 11th St	34.022364	-86.017063	Ground Absorbed
West River POTW	3/5/20	6450	402 N 11th St	34.022364	-86.017063	Ground Absorbed
West River POTW	3/23/20	6400	402 N. 11th Street	34.022364	-86.017063	Ground Absorbed
West River POTW	4/13/20	4800	515 Bryan Street	34.011566	-86.061469	Ground Absorbed
West River POTW	4/23/20	675	402 N 11th Street	34.022364	-86.017063	Ground Absorbed
West River POTW	10/29/20	2520	404 N 11th Street	34.02242	-86.017102	Ground Absorbed, Drainage Ditch
West River POTW	10/29/20	5625	1690 S 11th Street	33.996104	-86.030954	Ground Absorbed
West River POTW	11/23/20	1800	463 Roslyn Drive	34.044245	-85.954856	Ground Absorbed
West River POTW	2/25/21	720	904 Willow Street	34.010059	-86.023322	Ground Absorbed
West River POTW	3/25/21	1150	996 4th Avenue	34.015045	-86.016057	Ground Absorbed
West River POTW	3/25/21	1100	2300 Hickory Street	34.003547	-86.036654	Ground Absorbed
West River POTW	7/8/21	960	404 N 11th Street	34.022406	-86.01728	Ground Absorbed; Drainage Ditch
West River POTW	7/27/21	5500	4610 Airport Road	33.990206	-86.078375	Ground Absorbed; Drainage Ditch
West River POTW	9/20/21	2610	11 W Tuscaloosa Avenue	34.02912	-86.045566	Ground Absorbed



**Figure 3: Dates of Unreported SSOs Alleged to Discharge to Surface Waters**

<b><u>Date</u></b>	<b><u>Location</u></b>	<b><u>Destination of Discharge</u></b>
2/26/21	N 30th St & W Meighan Blvd	Black Creek
3/24/21	Airport Road & Anita Lane	Bill Wills Creek
3/27/21	1 River Rd	Coosa River
4/24/21	Forrest Ave & S 21st St	Black Creek
5/4/21	Airport Road & Anita Lane	Bill Wills Creek



## AlaFile E-Notice

31-CV-2022-900009.00

To: CARRIE TOMPKINS BLANTON  
carrie.blanton@adem.alabama.gov

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# NOTICE OF ELECTRONIC FILING

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IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT V. WATER WORKS & SEWER  
31-CV-2022-900009.00

The following complaint was FILED on 1/12/2022 3:08:44 PM

Notice Date: 1/12/2022 3:08:44 PM

CASSANDRA JOHNSON  
CIRCUIT COURT CLERK  
ETOWAH COUNTY, ALABAMA  
801 FORREST AVENUE  
SUITE 202  
GADSDEN, AL, 35901

256-549-2150



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CIRCUIT COURT OF  
ETOWAH COUNTY, ALABAMA  
CASSANDRA JOHNSON, CLERK

State of Alabama  
Unified Judicial System  
Form ARCiv-93 Rev. 9/18

**COVER SHEET**  
**CIRCUIT COURT - CIVIL CASE**  
(Not For Domestic Relations Cases)

Ca:  
**31**

Date of Filing:  
01/12/2022

Judge Code:

**GENERAL INFORMATION**

**IN THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA**  
**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT v. WATER WORKS & SEWER BOARD OF THE**

**First Plaintiff:** ☐ Business ☐ Individual  
☒ Government ☐ Other

**First Defendant:** ☐ Business ☐ Individual  
☒ Government ☐ Other

**NATURE OF SUIT:** Select primary cause of action, by checking box (check only one) that best characterizes your action:

**TORTS: PERSONAL INJURY**

- ☐ WDEA - Wrongful Death  
☐ TONG - Negligence: General  
☐ TOMV - Negligence: Motor Vehicle  
☐ TOWA - Wantonness  
☐ TOPL - Product Liability/AEMLD  
☐ TOMM - Malpractice-Medical  
☐ TOLM - Malpractice-Legal  
☐ TOOM - Malpractice-Other  
☐ TBFM - Fraud/Bad Faith/Misrepresentation  
☐ TOXX - Other: \_\_\_\_\_

**TORTS: PERSONAL INJURY**

- ☐ TOPE - Personal Property  
☐ TORE - Real Property

**OTHER CIVIL FILINGS**

- ☐ ABAN - Abandoned Automobile  
☐ ACCT - Account & Nonmortgage  
☐ APAA - Administrative Agency Appeal  
☐ ADPA - Administrative Procedure Act  
☐ ANPS - Adults in Need of Protective Service

**OTHER CIVIL FILINGS (cont'd)**

- ☐ MSXX - Birth/Death Certificate Modification/Bond Forfeiture Appeal/Enforcement of Agency Subpoena/Petition to Preserve  
☐ CVRT - Civil Rights  
☐ COND - Condemnation/Eminent Domain/Right-of-Way  
☐ CTMP - Contempt of Court  
☐ CONT - Contract/Ejectment/Writ of Seizure  
☐ TOCN - Conversion  
☐ EQND - Equity Non-Damages Actions/Declaratory Judgment/Injunction Election Contest/Quiet Title/Sale For Division  
☐ CVUD - Eviction Appeal/Unlawful Detainer  
☐ FORJ - Foreign Judgment  
☐ FORF - Fruits of Crime Forfeiture  
☐ MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition  
☐ PFAB - Protection From Abuse  
☐ EPFA - Elder Protection From Abuse  
☐ QTLB - Quiet Title Land Bank  
☐ FELA - Railroad/Seaman (FELA)  
☐ RPRO - Real Property  
☐ WTEG - Will/Trust/Estate/Guardianship/Conservatorship  
☐ COMP - Workers' Compensation  
☒ CVXX - Miscellaneous Circuit Civil Case

**ORIGIN:** F ☒ **INITIAL FILING**

R ☐ **REMANDED**

A ☐ **APPEAL FROM DISTRICT COURT**

O ☐ **OTHER**

T ☐ **TRANSFERRED FROM OTHER CIRCUIT COURT**

**HAS JURY TRIAL BEEN DEMANDED?** ☐ YES ☒ NO

**Note:** Checking "Yes" does not constitute a demand for a jury trial. (See Rules 38 and 39, Ala.R.Civ.P. for procedure)

**RELIEF REQUESTED:** ☒ **MONETARY AWARD REQUESTED** ☐ **NO MONETARY AWARD REQUESTED**

**ATTORNEY CODE:**

TOM024

1/12/2022 3:08:39 PM

Date

/s/ CARRIE TOMPKINS BLANTON

Signature of Attorney/Party filing this form

**MEDIATION REQUESTED:** ☐ YES ☒ NO ☐ UNDECIDED

**Election to Proceed under the Alabama Rules for Expedited Civil Actions:** ☐ YES ☒ NO





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CIRCUIT COURT OF  
ETOWAH COUNTY, ALABAMA  
CASSANDRA JOHNSON, CLERK

**THE CIRCUIT COURT OF ETOWAH COUNTY, ALABAMA**

**ALABAMA DEPARTMENT of  
ENVIRONMENTAL MANAGEMENT,**

**Plaintiff,**

**v.**

**WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN,  
ALABAMA,**

**Defendant.**

**Civil Action No. CV-2022-\_\_\_\_\_**

**COMPLAINT**

The Alabama Department of Environmental Management (“the Department” or “ADEM”) files this Complaint against the Water Works & Sewer Board of the City of Gadsden, Alabama (“the Permittee” or “the Defendant”) and alleges as follows:

**I.  
THE PARTIES**

1. The Alabama Department of Environmental Management is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 through 22-22A-17, as amended. Pursuant to Ala. Code § 22-22A-4(n), the Department is the state agency responsible for the promulgation and enforcement of water pollution control regulations in accordance with the Federal Water Pollution Control Act, 33 U.S.C. §§ 1251 to 1388. In addition, the Department is authorized to administer and enforce the provisions of the Alabama Water Pollution Control Act (“AWPCA”), which is found at Ala. Code §§ 22-22-1 through 22-22-14, as amended. ADEM is authorized by Ala. Code § 22-22A-5(18)c. to recover civil penalties for violations of permits issued under the AWPCA and for unpermitted discharges of pollutants in violation of the Act, providing for a maximum of \$25,000.00 per violation.

2. The Water Works & Sewer Board of the City of Gadsden, Alabama (“the Permittee” or “the Defendant”) operates two wastewater treatment plants (“WWTPs”) known as the Gadsden East River WWTP and the Gadsden West River WWTP. The Defendant discharges pollutants from the Gadsden East River WWTP located at 601 Paden Road, in Gadsden, Alabama, into the Coosa River (Neely Henry Lake), a water of the State. The Defendant discharges pollutants from the Gadsden West River WWTP located at 2000 Wills Creek Road, in Gadsden, Alabama, into the Coosa River (Neely Henry Lake) and Big Wills Creek (stormwater only), waters of the State.

## **II. JURISDICTION AND VENUE**

3. The Court has jurisdiction and venue over this Complaint pursuant to Ala. Code § 22-22A-5(18)b. and § 22-22A-5(19), as amended.

## **III. GENERAL ALLEGATIONS**

4. Pursuant to the National Pollutant Discharge Elimination System (“NPDES”) program administered by ADEM and approved by the Administrator of the U.S. Environmental Protection Agency pursuant to § 402 of the Federal Water Pollution Control Act, 33 U.S.C. § 1342, the Department issued NPDES Permit Number AL0022659 (“the Gadsden East River WWTP Permit”) to the Permittee. The Gadsden East River WWTP Permit was reissued October 23, 2015, effective November 1, 2015. The Gadsden East River WWTP Permit was again reissued October 22, 2021, effective November 1, 2021. The Gadsden East River WWTP Permit establishes limitations, terms, and conditions on the discharge of pollutants and stormwater from point

sources, described therein as Outfalls 001, 002, and 003 into the Coosa River (Neely Henry Lake), a water of the State.

5. The Gadsden East River WWTP Permit requires that the Permittee monitor its discharges and submit periodic Discharge Monitoring Reports (“DMRs”) to the Department describing the results of the monitoring. The Gadsden East River WWTP Permit also requires that the Permittee properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Defendant to achieve compliance with the conditions of the Permit.

6. Pursuant to the NPDES program administered by ADEM and approved by the Administrator of the U.S. Environmental Protection Agency pursuant to § 402 of the Federal Water Pollution Control Act, 33 U.S.C. § 1342, the Department issued NPDES Permit Number AL0053201 (“the Gadsden West River WWTP Permit”) to the Permittee. The Gadsden West River WWTP Permit was reissued May 22, 2012, effective June 1, 2012. The Gadsden West River WWTP Permit was again reissued January 3, 2018, effective February 1, 2018. The Gadsden West River WWTP Permit establishes limitations, terms, and conditions on the discharge of pollutants and stormwater from point sources, described therein as Outfall 001 into the Coosa River (Neely Henry Lake) and Outfalls 002 and 003 into Big Wills Creek, waters of the State.

7. The Gadsden West River WWTP Permit requires that the Permittee monitor its discharges and submit periodic DMRs to the Department describing the results of the monitoring. The Gadsden West River WWTP Permit also requires that the Permittee properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Defendant to achieve compliance with the conditions of the Permit.



8. Permit Condition I.A. of the Gadsden East River WWTP Permit requires that discharges be limited and monitored as specified in the Permit. The DMRs submitted to the Department by the Defendant indicate that the Defendant has discharged pollutants from the aforementioned point source, the Gadsden East River WWTP Outfall 0011, into the Coosa River (Neely Henry Lake) in violation of the limits imposed by the Permit. The months the violations occurred along with the parameters violated are listed in Exhibit A.

9. Ala. Code § 22-22-9(i)(3) requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The sanitary sewer overflow (“SSO”) reports listed in Exhibit B indicate that wastewater, in the form of SSOs, was discharged from the Gadsden East River WWTP without a permit. Permit Condition I.C.2.e of the Gadsden East River WWTP Permit requires reports to the Department detailing notifiable SSOs.

10. Permit Condition I.B.7 of the Gadsden East River WWTP Permit requires that flow measurement devices be calibrated at least once every twelve months. Permit Condition I.B.5 requires the Defendant to retain records of all monitoring information, including all calibration and maintenance records for a period of three years. During the Department’s Compliance Evaluation Inspections on January 27, 2017, and July 27, 2021, flow meter calibration records were not available for review.

11. Permit Condition I.A. of the Gadsden West River WWTP Permit requires that discharges be limited and monitored as specified in the Permit. The DMRs submitted to the Department by the Defendant indicate that the Defendant has discharged pollutants from the aforementioned point source, the Gadsden West River WWTP Outfall 0011, into the Coosa River (Neely Henry Lake) in violation of the limits imposed by the Permit. The months the violations occurred along with the parameters violated are listed in Exhibit C.

12. Ala. Code § 22-22-9(i)(3) requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The SSO reports listed in Exhibit D indicate that wastewater, in the form of SSOs, was discharged from the Gadsden West River WWTP without a permit. Permit Condition I.C.2.f of the Gadsden West River WWTP Permit requires reports to the Department detailing notifiable SSOs.

13. Permit Condition I.B.7 of the Gadsden West River WWTP Permit requires that flow measurement devices be calibrated at least once every twelve months. Permit Condition I.B.5 requires the Defendant to retain records of all monitoring information, including all calibration and maintenance records for a period of three years. During the Department's Compliance Evaluation Inspections on November 30, 2016, December 4, 2017, and November 8, 2018, flow meter calibration records were not available for review.

### **CAUSES OF ACTION**

#### **COUNT I**

14. Plaintiff repeats and re-alleges the allegations in the foregoing paragraphs as if fully set forth herein.

15. The above violations are due to be abated by injunction.

#### **COUNT II**

16. Plaintiff repeats and re-alleges the allegations in the foregoing paragraphs as if fully set forth herein.

17. Pursuant to Ala. Code § 22-22A-5(18), as amended, a civil penalty is due to be assessed for the referenced violations.

**PRAYER FOR RELIEF**

WHEREFORE, Plaintiff respectfully requests that the Court:

- A. Take jurisdiction over this matter.
- B. Adjudge and declare that the Defendant violated the limitations, terms, and conditions of the Permits.
- C. Adjudge and declare that the Defendant caused or allowed discharges of pollutants from its wastewater treatment facilities into waters of the State in violation of the limitations set forth in the Permits.
- D. Adjudge and declare that Defendant caused or allowed unpermitted discharges of pollutants from its wastewater treatment facilities.
- E. Order the Defendant to take action to ensure that similar violations of the AWPCA and its Permits will not recur in the future.
- F. Assess a civil penalty against the Defendant and in favor of Plaintiff pursuant to Ala. Code §§ 22-22A-5(18)b. and c., as amended, for each and every violation of the Permits alleged in this Complaint.
- G. Tax the costs of this action against the Defendant.
- H. Order such other relief that the Court deems proper.



Respectfully submitted,

Steve Marshall  
*Attorney General*

s/ Carrie T. Blanton  
Carrie T. Blanton (TOM024)  
*Assistant Attorney General*

s/ Mary-Frank Brown  
Mary-Frank Brown (BRO156)  
*Assistant Attorney General*

**ADDRESS OF COUNSEL:**

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**EXHIBIT A**Permit Effluent Limitation Violations

Facility Name: Gadsden East River WWTP

Permit Number: AL0022659

<b><u>Monitoring Period</u></b>	<b><u>Outfall</u></b>	<b><u>Parameter</u></b>	<b><u>Limit Type</u></b>	<b><u>Unit</u></b>	<b><u>Limit</u></b>	<b><u>Reported Value</u></b>
March 2020	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	84
December 2019	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	83
March 2019	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	82
February 2019	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	76.3
January 2019	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	77
December 2018	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	74.6
November 2018	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	81.1
February 2018	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	83.6
August 2017	001T	Toxicity, Ceriodaphnia Chronic	Single Sample	pass(0)/fail(1)	0	1

## EXHIBIT B

### SSOs

Facility Name: Gadsden East River WWTP  
Permit Number: AL0022659

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
12/30/2021 8:29 P	12/30/2021 9:00 P	31Mins	827 Paden Road	310	Company Website 12/30/2021	12/30/2021	12/30/2021	12/30/2021
12/18/2021 12:31 P	12/18/2021 2:39 P	2Hrs 8Mins	1017 Gray Road	20000	Company Website: 12/18/2021	12/18/2021	12/18/2021	12/18/2021
4/26/2021 2:12 P	4/26/2021 2:37 P	0Hrs 25Mins	1336 Merryhill Avenue	250	Signs: 4/26/2021 Company Website: 4/26/2021	4/26/2021	4/26/2021	4/26/2021
3/31/2021 9:53 A	3/31/2021 10:23 A	0Hrs 30Mins	1102 Slusser Avenue	600	Signs: 3/31/2021 Company Website: 3/31/2021	3/31/2021	3/31/2021	3/31/2021
3/24/2021 8:30 A	3/24/2021 9:45 A	1Hrs 15Mins	509 College Parkway	3750	Signs: 3/24/2021 Company Website: 3/24/2021	3/24/2021	3/24/2021	3/24/2021
10/28/2020 9:06 A	10/28/2020 10:45 A	1Hrs 39Mins	2822 East Broad Street	900	Signs: 10/28/2020 Company Website: 10/28/2020	10/28/2020	10/28/2020	10/28/2020
10/28/2020 9:06 A	10/28/2020 11:20 A	2Hrs 14Mins	977 Gray Road	5360	Signs: 10/28/2020 Company Website: 10/28/2020	10/28/2020	10/28/2020	10/28/2020
10/28/2020 9:15 A	10/28/2020 10:45 A	1Hrs 30Mins	2818 Fields Avenue	3600	Signs: 10/28/2020 Company Website: 10/28/2020	10/28/2020	10/28/2020	10/28/2020
6/17/2020 8:20 A	6/17/2020 8:45 A	0Hrs 25Mins	225 Riverside Drive	250	Signs: 6/17/2020 Company Website: 6/17/2020	6/17/2020	6/17/2020	6/17/2020



**EXHIBIT B (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
2/6/2020 9:35 A	2/6/2020 10:25 A	0Hrs 50Mins	123 Brookwood Street	500	Signs: 2/6/2020 Company Website: 2/6/2020	2/6/2020	2/6/2020	2/6/2020
1/2/2020 1:30 P	1/3/2020 6:30 A	17Hrs 0Mins	103 Margaret Street	4800	Signs: 1/3/2020 Company Website: 1/3/2020	1/3/2020	1/3/2020	1/3/2020
12/22/2019 9:00 P	12/23/2019 1:00 P	16Hrs 0Mins	103 Margaret St	4800	Signs: 12/23/2019 Company Website: 12/23/2019	12/23/2019	12/23/2019	12/23/2019
10/31/2019 1:54 P	10/31/2019 2:45 P	0Hrs 51Mins	103 Margaret Street	510	Signs: 10/31/2019 Company Website: 10/31/2019	10/31/2019	10/31/2019	10/31/2019
10/31/2019 1:28 P	10/31/2019 2:45 P	1Hrs 17Mins	2820 E Broad Street	770	Signs: 10/31/2019 Company Website: 10/31/2019	10/31/2019	10/31/2019	10/31/2019
10/30/2019 2:55 P	10/30/2019 8:00 P	5Hrs 5Mins	3211 Calhoun Drive	1525	Signs: 10/31/2019 Company Website: 10/31/2019	10/31/2019	10/31/2019	10/31/2019
10/25/2019 12:57 A	10/25/2019 7:15 P	18Hrs 18Mins	3211 Calhoun Drive	1890	Signs: 10/26/2019 Company Website: 10/26/2019	10/26/2019	10/26/2019	10/26/2019
10/16/2019 1:57 P	10/16/2019 2:24 P	0Hrs 27Mins	1102 Raley Street	125	Signs: 10/16/2019 Company Website: 10/16/2019	10/16/2019	10/16/2019	10/16/2019
3/1/2019 10:00 A	3/1/2019 10:45 A	0Hrs 45Mins	3201 Gurley Avenue	900	Signs: 3/1/2019 Company Website: 3/1/2019	3/1/2019	3/1/2019	3/1/2019
2/22/2019 11:00 A	2/23/2019 7:15 A	20Hrs 15Mins	701 George Wallace Drive	1,000 - 10,000	Signs: 2/23/2019 Company Website: 2/23/2019	2/23/2019	2/23/2019	2/23/2019

**EXHIBIT B (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
2/21/2019 9:30 A	2/22/2019 6:00 A	20Hrs 30Mins	701 George Wallace Drive	1,000 - 10,000	Signs: 2/22/2019 Company Website: 2/22/2019	2/22/2019	2/22/2019	2/22/2019
2/19/2019 3:00 P	2/20/2019 7:00 A	16Hrs 0Mins	701 George Wallace Drive	4500	Signs: 2/20/2019 Company Website: 2/20/2019	2/20/2019	2/20/2019	2/20/2019
1/19/2019 2:00 P	1/19/2019 6:00 P	4Hrs 0Mins	701 George Wallace Drive	3600	Signs: 1/19/2019 Company Website: 1/22/2019	1/19/2019	1/19/2019	1/19/2019
1/18/2019 9:00 A	1/18/2019 11:00 A	2Hrs 0Mins	1798 Woodside Avenue	1200	Signs: 1/18/2019 Company Website: 1/18/2019	1/18/2019	1/18/2019	1/18/2019
1/4/2019 9:00 A	1/4/2019 3:30 P	6Hrs 30Mins	499 7th St S	7800	Company Website: 1/4/2019	1/4/2019	1/4/2019	1/4/2019
12/28/2018 7:00 A	12/28/2018 12:00 P	5Hrs 0Mins	703 George Wallace Dr	6000	Company Website: 12/28/2018	12/28/2018	12/28/2018	12/28/2018
12/28/2018 8:00 A	12/28/2018 12:00 P	4Hrs 0Mins	499 7th St S.	4800	Company Website: 12/28/2018	12/28/2018	12/28/2018	12/28/2018
12/28/2018 8:00 A	12/28/2018 12:00 P	4Hrs 0Mins	2822 E Broad St	2400	Company Website: 12/28/2018	12/28/2018	12/28/2018	12/28/2018
12/9/2018 8:00 A	12/9/2018 10:00 A	2Hrs 0Mins	499 7th St S	3600	Company Website: 12/10/2018	12/9/2018	12/9/2018	12/9/2018
8/24/2018 8:00 A	8/24/2018 10:00 A	2Hrs 0Mins	608 Magnolia Ave.	240	Company Website: 8/24/2018	8/24/2018	8/24/2018	8/24/2018
6/25/2018 8:00 A	6/25/2018 9:00 A	1Hrs 0Mins	235 Riverside Drive	300	Company Website: 6/25/2018	6/25/2018	6/25/2018	6/25/2018
3/24/2018 8:00 P	3/24/2018 11:00 P	3Hrs 0Mins	860 Goodyear Ave.	900	Company Website: 3/26/2018	3/25/2018	3/25/2018	3/25/2018
3/2/2018 2:35 P	3/2/2018 3:45 P	1Hrs 10Mins	409 Herzberg Circle Gadsden, AL 35903	20	Company Website: 3/2/2018	3/2/2018	3/2/2018	3/2/2018



**EXHIBIT B (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
12/14/2017 1:00 P	12/14/2017 2:00 P	1Hrs 0Mins	1115 Stillman Ave.	180	Company Website: 12/14/2017	12/14/2017	12/14/2017	12/14/2017
8/11/2017 2:00 P	8/11/2017 3:00 P	1Hrs 0Mins	1124 Bonton Ave.	240	Company Website: 8/11/2017	No*	8/11/2017	8/11/2017
7/24/2017 6:00 P	7/24/2017 7:00 P	1Hrs 0Mins	100 20th St. N, Gadsden, Al	120	Company Website: 7/25/2017	No*	7/25/2017	7/25/2017
6/28/2017 8:00 A	6/28/2017 10:00 A	2Hrs 0Mins	1400 Poplar St.	1200	Company Website: 6/28/2017	No*	6/28/2017	6/28/2017
6/23/2017 8:00 A	6/23/2017 10:00 A	2Hrs 0Mins	1124 Stillman Ave., Gadsden, Al	360	Company Website: 6/23/2017	No*	6/23/2017	6/23/2017
5/19/2017 9:00 A	5/19/2017 11:00 A	2Hrs 0Mins	610 Magnolia Ave., Gadsden, Al	60	Company Website: 5/19/2017	No*	5/19/2017	5/19/2017
4/10/2017 3:00 P	4/10/2017 4:00 P	1Hrs 0Mins	608 Magnolia Ave., Gadsden, Al	180	Company Website: 4/11/2017	No*	4/11/2017	4/11/2017
4/5/2017 8:00 A	4/5/2017 11:00 A	3Hrs 0Mins	2803 E. Broad St., Gadsden, Al	540	Company Website: 4/6/2017	No*	4/6/2017	4/6/2017
4/3/2017 9:00 A	4/3/2017 1:00 P	4Hrs 0Mins	2803 E. Broad St., Gadsden, Al	1440	Company Website: 4/3/2017	No*	4/3/2017	4/3/2017
3/9/2017 9:00 P	3/10/2017 8:00 A	11Hrs 0Mins	1407 Rhea St., Gadsden, Al	6600	Company Website: 3/10/2017	No*	3/10/2017	3/10/2017
1/27/2017 8:00 A	1/27/2017 11:00 A	3Hrs 0Mins	1407 Rhea St., Gadsden, Al	3600	Company Website: 1/27/2017	No*	1/27/2017	1/27/2017
12/4/2016 12:00 P	12/6/2016 12:00 P	48Hrs 0Mins	1125 Bonton Ave., Gadsden, Al	2880	Company Website: 12/6/2016	No*	12/6/2016	12/6/2016

\* The SSO report submitted by the Defendant indicates that the State Health Department was notified of the SSO event.



**EXHIBIT C**Permit Effluent Limitation Violations

Facility Name: Gadsden West River WWTP

Permit Number: AL0053201

<b><u>Monitoring Period</u></b>	<b><u>Outfall</u></b>	<b><u>Parameter</u></b>	<b><u>Limit Type</u></b>	<b><u>Unit</u></b>	<b><u>Limit</u></b>	<b><u>Reported Value</u></b>
May 2021	0011	E. Coli	Monthly Avg Min	col/100 mL	298	1203
March 2020	0011	TSS % Rmvl	Monthly Avg Min	%	85.0	81
January 2020	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	80
December 2019	0011	CBOD % Rmvl	Maximum Daily	%	85.0	82
October 2019	0011	E. Coli	Monthly Avg Min	col/100 mL	298	1966
December 2018	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	83
November 2018	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	84
March 2018	0011	CBOD % Rmvl	Monthly Avg Min	%	85.0	80.0

# EXHIBIT D

## SSOs

Facility Name: Gadsden West River WWTP  
Permit Number: AL0053201

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
01/03/2022 6:41 A	01/03/2022 9:08 A	2Hrs 27Mins	687 Tuscaloosa Ave	735	Signs: 1/3/2021 Company Website: 1/3/2021	1/3/2022	1/3/2022	1/3/2022
12/24/2021 11:23 A	12/24/2021 1:30 P	2Hrs 7Mins	204 Waterford Lane	635	Signs: 12/24/2021 Company Website: 12/24/2021	12/24/2021	12/24/2021	12/24/2021
12/17/2021 1:04 P	12/17/2021 2:50 P	1Hrs 46Mins	1503 Gardner Street	100	Signs: 12/17/2021 Company Website: 12/17/2021	12/17/2021	12/17/2021	12/17/2021
11/27/2021 5:45 P	11/27/2021 6:25 P	0Hrs 40Mins	531 Broad Street	75	Company Website: 11/27/2021	11/27/2021	11/27/2021	11/27/2021
9/20/2021 9:36 A	9/20/2021 12:30 P	2Hrs 54Mins	11 W Tuscaloosa Avenue	2610	Signs: 9/20/2021 Company Website: 9/20/2021	9/20/2021	9/20/2021 2:15 P	9/20/2021
7/27/2021 10:30 A	7/27/2021 12:20 P	1Hrs 50Mins	4610 Airport Road	5500	Signs: 7/27/2021 Company Website: 7/27/2021	7/27/2021	7/27/2021 2:45 P	7/27/2021
7/8/2021 7:54 A	7/8/2021 9:30 A	1Hrs 36Mins	404 N 11th Street	960	Signs: 7/8/2021 Company Website: 7/8/2021	7/8/2021	7/8/2021 10:15 A	7/8/2021
3/31/2021 1:09 P	3/31/2021 7:15 P	6Hrs 6Mins	327 Princeton Avenue	3660	Signs: 4/1/2021 Company Website: 4/1/2021	4/1/2021	4/1/2021 8:50 A	4/1/2021
3/31/2021 1:45 P	3/31/2021 7:00 P	5Hrs 15Mins	108 S 21st Street	6300	Signs: 4/1/2021 Company Website: 4/1/2021	4/1/2021	4/1/2021 8:45 A	4/1/2021

**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
3/31/2021 1:09 P	3/31/2021 7:15 P	6Hrs 6Mins	200 Princeton Avenue	2562	Signs: 4/1/2021 Company Website: 4/1/2021	4/1/2021	4/1/2021 8:55 A	4/1/2021
3/30/2021 9:15 A	3/30/2021 10:15 A	1Hrs 0Mins	4134 Brooke Avenue	9000	Signs: 3/30/2021 Company Website: 3/30/2021	3/30/2021	3/30/2021 2:15 P	3/30/2021
3/25/2021 1:39 P	3/25/2021 2:02 P	0Hrs 23Mins	996 4th Avenue	1150	Signs: 3/25/2021 Company Website: 3/25/2021	3/25/2021	3/25/2021 12:10 P	3/25/2021
3/25/2021 7:10 P	3/25/2021 9:00 P	1Hrs 50Mins	2300 Hickory Street	1100	Signs: 3/26/2021 Company Website: 3/26/2021	3/26/2021	3/26/2021 1:45 P	3/26/2021
3/25/2021 5:58 P	3/25/2021 7:37 P	1Hrs 39Mins	4688 Airport Road; Manhole #133	<=1,000	Company Website: 3/26/2021	3/26/2021	3/25/2021 11:58 P	3/26/2021
3/1/2021 8:19 A	3/1/2021 8:50 A	0Hrs 31Mins	111 Lakepoint Drive	800	Signs: 3/2/2021 Company Website: 3/2/2021	3/2/2021	3/2/2021 7:15 A	3/2/2021
2/26/2021 10:15 A	2/26/2021 11:00 A	0Hrs 45Mins	408 N 30th Street	2250	Signs: 2/26/2021 Company Website: 2/26/2021	2/26/2021	2/26/2021 3:00 P	2/26/2021
2/25/2021 9:27 A	2/25/2021 10:15 A	0Hrs 48Mins	904 Willow Street	720	Signs: 2/25/2021 Company Website: 2/25/2021	2/25/2021	2/25/2021 2:45 P	2/25/2021
2/1/2021 10:00 A	2/1/2021 10:15 A	0Hrs 15Mins	273 Walker Street	300	Signs: 2/1/2021 Company Website: 2/1/2021	2/1/2021	2/1/2021 1:50 P	2/1/2021
1/26/2021 8:33 A	1/26/2021 9:15 A	0Hrs 42Mins	1811 Truman Street	840	Signs: 1/26/2021 Company Website: 1/26/2021	1/26/2021	1/26/2021 11:40 A	1/26/2021
12/24/2020 8:24 A	12/24/2020 1:30 P	5Hrs 6Mins	4688 Airport Road, MH #133	1,000 - 10,000	Company Website: 12/24/2020	12/24/2020	12/24/2020 10:34 A	12/24/2020



**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
12/7/2020 12:30 P	12/7/2020 2:00 P	1Hrs 30Mins	25 Lakefront Avenue	1800	Signs: 12/7/2020 Company Website: 12/7/2020	12/7/2020	12/7/2020 2:30 P	12/7/2020
11/23/2020 7:00 A	11/23/2020 9:00 A	2Hrs 0Mins	463 Roslyn Drive	1800	Signs: 11/23/2020 Company Website: 11/23/2020	11/23/2020	11/23/2020 12:30 P	11/23/2020
11/2/2020 7:51 A	11/2/2020 10:30 A	2Hrs 39Mins	970 Hadwen Street	30000	Signs: 11/2/2020 Company Website: 11/2/2020	11/2/2020	11/2/2020 2:20 P	11/2/2020
10/29/2020 2:00 P	10/29/2020 8:15 P	6Hrs 15Mins	1690 S 11th Street	5625	Signs: 10/30/2020 Company Website: 10/30/2020	10/30/2020	10/30/2020 8:55 A	10/30/2020
10/29/2020 12:48 P	10/29/2020 2:45 P	1Hrs 57Mins	404 N 11th Street	2520	Signs: 10/29/2020 Company Website: 10/29/2020	10/29/2020	10/29/2020 3:10 P	10/29/2020
10/16/2020 9:09 A	10/16/2020 10:30 A	1Hrs 21Mins	Manhole before Pump Station	<=1,000	Company Website: 10/16/2020	10/16/2020	10/16/2020 11:58 A	10/16/2020
9/4/2020 9:19 A	9/4/2020 9:50 A	0Hrs 31Mins	1113 Tidmore Bend Road	930	Signs: 9/4/2020 Company Website: 9/4/2020	9/4/2020	9/4/2020 1:45 P	9/4/2020
4/23/2020 3:15 P	4/23/2020 5:30 P	2Hrs 15Mins	402 N 11th Street	675	Signs: 4/24/2020 Company Website: 4/24/2020	4/24/2020	4/24/2020 12:15 P	4/24/2020
4/13/2020 1:00 A	4/13/2020 4:00 A	3Hrs 0Mins	515 Bryan Street	4800	Signs: 4/13/2020 Company Website: 4/13/2020	4/13/2020	4/13/2020 11:30 A	4/13/2020
4/2/2020 9:13 P	4/3/2020 12:00 P	14Hrs 47Mins	153 S 29th Street	8870	Signs: 4/3/2020 Company Website: 4/3/2020	4/3/2020	4/3/2020 12:50 P	4/3/2020
4/2/2020 9:13 P	4/3/2020 12:00 A	2Hrs 47Mins	2816 Forrest Avenue	1670	Signs: 4/3/2020 Company Website: 4/3/2020	4/3/2020	4/3/2020 1:45 P	4/3/2020

**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
3/23/2020 8:46 A	3/24/2020 7:49 A	23Hrs 3Mins	402 N. 11th Street Gadsden, AL 35901	6400	Signs: 3/23/2020 Company Website: 3/24/2020	3/24/2020	3/24/2020 8:30 A	3/24/2020
3/5/2020 2:00 P	3/6/2020 12:00 P	22Hrs 0Mins	406 N 6th St	6600	Signs: 3/6/2020 Company Website: 3/6/2020	3/6/2020	3/6/2020 12:45 P	3/6/2020
3/5/2020 2:00 P	3/6/2020 11:30 A	21Hrs 30Mins	402 N 11th St	6450	Signs: 3/6/2020 Company Website: 3/6/2020	3/6/2020	3/6/2020 12:35 P	3/6/2020
3/5/2020 7:50 A	3/8/2020 10:28 A	74Hrs 38Mins	1884 Rainbow Drive	25,000 - 50,000	Signs: 3/6/2020 Company Website: 3/6/2020	3/6/2020	3/6/2020 7:30 A	3/9/2020
2/25/2020 11:10 A	2/26/2020 7:10 A	20Hrs 0Mins	1884 Rainbow Drive	6000	Signs: 2/26/2020 Company Website: 2/26/2020	2/26/2020	2/26/2020 7:50 A	2/26/2020
2/21/2020 12:21 P	2/23/2020 12:19 P	47Hrs 58Mins	1884 Rainbow Drive	25,000 - 50,000	Signs: 2/22/2020 Company Website: 2/22/2020	2/22/2020	2/22/2020 12:05 P	2/24/2020
2/21/2020 8:20 A	2/21/2020 8:45 A	0Hrs 25Mins	204 Waterford Lane	250	Signs: 2/21/2020 Company Website: 2/21/2020	2/21/2020	2/21/2020 12:35 P	2/21/2020
2/20/2020 12:55 P	2/21/2020 10:25 A	21Hrs 30Mins	406 N 6th St	6450	Signs: 2/21/2020 Company Website: 2/21/2020	2/21/2020	2/21/2020 12:10 P	2/21/2020
2/20/2020 12:55 P	2/21/2020 12:15 P	23Hrs 20Mins	402 N 11th St	8000	Signs: 2/21/2020 Company Website: 2/21/2020	2/21/2020	2/21/2020	2/21/2020
2/20/2020 1:00 P	2/20/2020 2:30 P	1Hrs 30Mins	103 Goldenrod Ave	450	Signs: 2/20/2020 Company Website: 2/20/2020	2/20/2020	2/20/2020 2:50 P	2/20/2020



**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
2/10/2020 3:44 P	2/11/2020 2:20 P	22Hrs 36Mins	402 N 11th Street	6780	Signs: 2/11/2020 Company Website: 2/11/2020	2/11/2020	2/11/2020 2:55 P	2/11/2020
2/6/2020 8:05 A	2/7/2020 5:40 A	21Hrs 35Mins	402 N 11th St	9175	Signs: 2/7/2020 Company Website: 2/7/2020	2/7/2020	2/7/2020 7:50 A	2/7/2020
2/6/2020 8:05 A	2/7/2020 5:40 A	21Hrs 35Mins	301 N 6th Place	7700	Signs: 2/7/2020 Company Website: 2/7/2020	2/7/2020	2/7/2020 7:45 A	2/7/2020
12/23/2019 10:35 A	12/23/2019 1:50 P	3Hrs 15Mins	1884 Rainbow Drive	4875	Signs: 12/23/2019 Company Website: 12/23/2019	12/23/2019	12/23/2019 4:00 P	12/23/2019
12/23/2019 8:00 A	12/23/2019 12:26 P	4Hrs 26Mins	515 Bryan Street	2660	Signs: 12/23/2019 Company Website: 12/23/2019	12/23/2019	12/23/2019 3:55 P	12/23/2019
12/23/2019 8:00 A	12/23/2019 10:20 A	2Hrs 20Mins	4688 Airport Road	1400	Signs: 12/23/2019 Company Website: 12/23/2019	12/23/2019	12/23/2019 4:05 P	12/23/2019
12/22/2019 8:55 P	12/23/2019 12:15 P	15Hrs 20Mins	301 N 6th Place	9200	Signs: 12/23/2019 Company Website: 12/23/2019	12/23/2019	12/23/2019 3:45 P	12/23/2019
12/22/2019 9:00 P	12/23/2019 2:30 P	17Hrs 30Mins	402 N 11th Street	7875	Signs: 12/23/2019 Company Website: 12/23/2019	12/23/2019	12/23/2019 4:10 P	12/23/2019
12/4/2019 1:30 P	12/4/2019 2:33 P	1Hrs 3Mins	912 Willow Street	3150	Signs: 12/5/2019 Company Website: 12/5/2019	12/5/2019	12/5/2019 9:30 A	12/5/2019
10/25/2019 12:15 A	10/26/2019 6:00 A	29Hrs 45Mins	402 N 11th Street	8325	Signs: 10/26/2019 Company Website: 10/26/2019	10/26/2019	10/26/2019 7:30 A	10/26/2019



**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
10/25/2019 12:15 P	10/26/2019 6:00 A	17Hrs 45Mins	301 N 6th Pl	5325	Signs: 10/26/2019 Company Website: 10/26/2019	10/26/2019	10/26/2019 7:30 A	10/26/2019
10/25/2019 12:57 P	10/25/2019 2:00 P	1Hrs 3Mins	419 Roslyn Drive	315	Signs: 10/25/2019 Company Website: 10/25/2019	10/25/2019	10/25/2019 3:00 P	10/25/2019
6/5/2019 10:00 A	6/5/2019 10:35 A	0Hrs 35Mins	419 Roslyn Drive, Gadsden, AL	75	Signs: 6/5/2019 Company Website: 6/5/2019	6/5/2019	6/5/2019 2:50 P	6/5/2019
5/31/2019 8:15 A	5/31/2019 8:30 A	0Hrs 15Mins	Morningview Drive, Gadsden AL	50	Signs: 5/31/2019 Company Website: 5/31/2019	5/31/2019	5/31/2019 10:30 A	5/31/2019
2/22/2019 12:15 P	2/22/2019 2:45 P	2Hrs 30Mins	1324 Jackson Avenue	750	Signs: 2/22/2019 Company Website: 2/22/2019	2/22/2019	2/22/2019 3:10 P	2/22/2019
2/21/2019 9:30 A	2/21/2019 11:00 A	1Hrs 30Mins	1324 Jackson Avenue	450	Signs: 2/21/2019 Company Website: 2/21/2019	2/21/2019	2/21/2019 2:40 P	2/21/2019
2/21/2019 7:30 A	2/21/2019 8:15 A	0Hrs 45Mins	4688 Airport Road	900	Signs: 2/21/2019 Company Website: 2/21/2019	2/21/2019	2/21/2019 2:35 P	2/21/2019
2/19/2019 1:30 P	2/25/2019 10:00 A	140Hrs 30Mins	404 N. 11th Street	25,000 - 50,000	Signs: 2/20/2019 Company Website: 2/20/2019	2/20/2019	2/20/2019 11:50 A	2/20/2019
2/19/2019 1:30 P	2/26/2019 7:00 A	161Hrs 30Mins	406 N. 6th Street	10,000 - 25,000	Signs: 2/20/2019 Company Website: 2/20/2019	2/20/2019	2/20/2019 12:00 P	2/20/2019
2/19/2019 2:30 P	2/20/2019 6:30 A	16Hrs 0Mins	4688 Airport Road	8400	Signs: 2/20/2019 Company Website: 2/20/2019	2/20/2019	2/20/2019 12:25 P	2/20/2019

**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
2/17/2019 6:30 P	2/18/2019 9:30 A	15Hrs 0Mins	406 N. 6th Street	2520	Signs: 2/18/2019 Company Website: 2/18/2019	2/18/2019	2/18/2019 2:55 P	2/18/2019
2/17/2019 6:30 P	2/18/2019 2:30 P	20Hrs 0Mins	404 N. 11th Street	9600	Signs: 2/18/2019 Company Website: 2/18/2019	2/18/2019	2/18/2019 3:00 P	2/18/2019
1/24/2019 10:35 A	1/24/2019 11:05 A	0Hrs 30Mins	28 Cabot Avenue	150	Signs: 1/24/2019 Company Website: 1/24/2019	1/24/2019	1/24/2019 11:46 A	1/24/2019
1/23/2019 8:00 P	1/24/2019 9:00 A	13Hrs 0Mins	400 N. 6th St	3900	Signs: 1/24/2019 Company Website: 1/24/2019	1/24/2019	1/24/2019 11:40 A	1/24/2019
1/23/2019 4:00 P	1/24/2019 2:30 P	22Hrs 30Mins	408 N. 11th St	9450	Signs: 1/24/2019 Company Website: 1/24/2019	1/24/2019	1/24/2019 12:00 P	1/24/2019
1/19/2019 1:00 P	1/19/2019 6:30 P	5Hrs 30Mins	408 N. 11th St.	7800	Signs: 1/19/2019 Company Website: 1/22/2019	1/19/2019	1/19/2019 12:50 P	1/19/2019
1/19/2019 1:00 P	1/19/2019 6:30 P	5Hrs 30Mins	400 N. 6th St.	1950	Signs: 1/19/2019 Company Website: 1/22/2019	1/19/2019	1/19/2019 7:00 P	1/19/2019
1/4/2019 2:00 P	1/4/2019 7:00 P	5Hrs 0Mins	400 N 11th Street	1500	Company Website: 1/4/2019	1/7/2019	1/4/2019 12:00 P	1/4/2019
1/4/2019 9:00 A	1/4/2019 7:30 P	10Hrs 30Mins	400 N 6th Street	3150	Company Website: 1/4/2019	1/7/2019	1/4/2019 12:50 P	1/4/2019
12/29/2018 3:00 A	12/29/2018 4:00 A	1Hrs 0Mins	2476 Chesnut St.	1200	Signs: 12/29/2018 Company Website: 12/31/2018	12/29/2018	12/29/2018 2:00 P	12/29/2018
12/28/2018 7:00 A	12/28/2018 10:00 A	3Hrs 0Mins	1329 Jackson Ave.	180	Company Website: 12/28/2018	12/28/2018	12/28/2018 12:10 P	12/28/2018
12/28/2018 9:00 A	12/28/2018 10:00 A	1Hrs 0Mins	AL - 759 E	300	Company Website: 12/28/2018	12/28/2018	12/28/2018 12:00 P	12/28/2018



**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
12/28/2018 2:00 A	12/28/2018 10:00 A	8Hrs 0Mins	404 N. 6th St.	2400	Company Website: 12/28/2018	12/28/2018	12/28/2018 1:00 P	12/28/2018
12/8/2018 9:00 P	12/9/2018 11:00 A	14Hrs 0Mins	400 N 6th St	4200	Company Website: 12/10/2018	12/9/2018	12/9/2018 11:30 A	12/9/2018
12/1/2018 1:00 P	12/1/2018 4:00 P	3Hrs 0Mins	400 N. 6th St.	180	Company Website: 12/3/2018	12/3/2018	12/3/2018	12/3/2018
11/12/2018 6:18 P	11/12/2018 7:14 P	0Hrs 56Mins	93 River Road	1800	Company Website: 11/13/2018	11/13/2018	11/13/2018 10:00 A	11/13/2018
11/12/2018 6:18 P	11/12/2018 7:27 P	1Hrs 9Mins	23 River Road	600	Company Website: 11/13/2018	11/13/2018	11/13/2018 10:00 A	11/13/2018
9/27/2018 4:00 P	9/27/2018 6:00 P	2Hrs 0Mins	1323 Jackson Ave. MH#4595	360	Company Website: 9/28/2018	9/28/2018	9/28/2018 10:00 A	9/28/2018
8/8/2018 12:00 P	8/9/2018 9:00 A	21Hrs 0Mins	2200 Industrial Avenue	4320	Company Website: 8/9/2018	8/9/2018	8/9/2018 11:30 A	8/9/2018
7/4/2018 8:57 A	7/4/2018 10:56 A	1Hrs 59Mins	Rosemount Pump Station 3800 Roselawn Drive	100	Company Website: 7/4/2018	7/4/2018	7/4/2018 3:50 P	7/4/2018
6/28/2018 6:00 P	6/28/2018 7:00 P	1Hrs 0Mins	597 Van del Blvd.	1200	Company web page: 6/29/2018	6/29/2018	6/29/2018 10:00 A	6/29/2018
6/19/2018 9:00 A	6/19/2018 10:00 A	1Hrs 0Mins	2312 Sansom Ave.	180	Company Website: 6/19/2018	6/19/2018	6/19/2018 1:30 P	6/19/2018
5/16/2018 8:30 A	5/16/2018 10:00 A	1Hrs 30Mins	4689 Airport Rd.	9000	Company Website: 5/16/2018	5/16/2018	5/16/2018 11:00 A	5/16/2018
5/2/2018 8:00 A	5/2/2018 10:00 A	2Hrs 0Mins	702 Tarrant Ct.	720	Company Website: 5/2/2018	5/2/2018	5/2/2018 11:00 A	5/2/2018
2/16/2018 8:00 A	2/16/2018 4:00 P	8Hrs 0Mins	1282 Rainbow Drive	1440	Company Website: 2/19/2018	2/16/2018	2/16/2018 12:00 P	2/16/2018
2/13/2018 10:00 A	2/13/2018 11:00 A	1Hrs 0Mins	905 Brookside Dr.	600	Company Website: 2/13/2018	2/13/2018	2/13/2018 2:00 P	2/13/2018



**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
2/11/2018 1:00 P	2/11/2018 4:00 P	3Hrs 0Mins	401 N. 11th St.	1800	Company Website: 2/12/2018	2/11/2018	2/11/2018 4:15 P	2/11/2018
2/11/2018 12:00 P	2/11/2018 4:00 P	4Hrs 0Mins	515 Bryan St. Pump Station	4800	Company Website: 2/12/2018	2/11/2018	2/11/2018 4:00 P	2/11/2018
2/11/2018 1:00 P	2/11/2018 4:00 P	3Hrs 0Mins	400 N. 6th St.	1800	Company Website: 2/12/2018	2/11/2018	2/11/2018 4:30 P	2/11/2018
2/8/2018 9:00 A	2/8/2018 11:00 A	2Hrs 0Mins	199 Silvey St., Rainbow City, AL	1200	Company Website: 2/8/2018	2/8/2018	2/8/2018 2:00 P	2/8/2018
2/7/2018 8:00 A	2/7/2018 10:00 A	2Hrs 0Mins	408 N. 11th Street	720	Company Website: 2/7/2018	2/7/2018	2/7/2018 12:00 P	2/7/2018
2/7/2018 8:00 A	2/7/2018 10:00 A	2Hrs 0Mins	400 N. 6th Street	720	Company Website: 2/7/2018	2/7/2018	2/7/2018 12:00 P	2/7/2018
12/20/2017 8:00 A	12/20/2017 10:00 A	2Hrs 0Mins	515 Bryan St	3600	Company Website: 12/20/2017	12/20/2017	12/20/2017 2:00 P	12/20/2017
12/20/2017 8:00 A	12/20/2017 11:00 A	3Hrs 0Mins	400 N. 6th St.	540	Company Website: 12/20/2017	12/20/2017	12/20/2017 1:40 P	12/20/2017
12/20/2017 8:00 A	12/20/2017 11:00 A	3Hrs 0Mins	401 N 11th St.	540	Company Website: 12/20/2017	12/20/2017	12/20/2017 1:45 P	12/20/2017
11/20/2017 6:00 P	11/20/2017 8:00 P	2Hrs 0Mins	4699 Airport Rd., Gadsden, Al	7600	Company Website: 11/21/2017	11/21/2017	11/21/2017 12:00 P	11/21/2017
6/30/2017 12:00 P	6/30/2017 3:00 P	3Hrs 0Mins	430 N. 6th St.	1800	Company Website: 6/30/2017	6/30/2017	6/30/2017	6/30/2017
6/28/2017 5:00 P	6/28/2017 6:00 P	1Hrs 0Mins	4698 Airport Rd.	5700	Company Website: 6/29/2017	No*	6/29/2017	6/29/2017
6/14/2017 1:30 P	6/14/2017 2:00 P	0Hrs 30Mins	Manhole #517 901 Rainbow Drive	400	Company Website: 6/14/2017	6/14/2017	6/14/2017	6/14/2017
5/24/2017 11:00 A	5/24/2017 1:00 P	2Hrs 0Mins	400 N. 6th St., Gadsden, Al	720	Company Website: 5/24/2017	No*	5/24/2017	5/24/2017
5/15/2017 8:00 A	5/15/2017 10:00 A	2Hrs 0Mins	338 Howell Cir, Gadsden, Al	540	Company Website: 5/15/2017	No*	5/15/2017	5/15/2017

**EXHIBIT D (CONTINUED)**

<u>Start</u>	<u>Stop</u>	<u>Duration</u>	<u>Location</u>	<u>Volume (gallons)</u>	<u>Public Notice</u>	<u>CHD Notice</u>	<u>24 Hour Notice</u>	<u>5-Day Report</u>
4/13/2017 2:00 P	4/13/2017 3:30 P	1Hrs 30Mins	31 Cabot Ave., Gadsden, AL	180	Company Website: 4/13/2017	No*	4/13/2017	4/13/2017
4/11/2017 2:00 P	4/11/2017 3:00 P	1Hrs 0Mins	405 N. 11th St., Gadsden, AL	600	Company Website: 4/11/2017	No*	4/11/2017	4/11/2017
4/3/2017 9:00 A	4/3/2017 1:00 P	4Hrs 0Mins	400 N. 6th St., Gadsden, AL	1440	Company Website: 4/3/2017	No*	4/3/2017	4/3/2017
4/3/2017 9:00 A	4/3/2017 1:00 P	4Hrs 0Mins	94 River Rd, Gadsden, AL	1800	Company Website: 4/3/2017	No*	4/3/2017	4/3/2017
4/3/2017 9:00 A	4/3/2017 1:00 P	4Hrs 0Mins	405 N. 11th St., Gadsden, AL	1440	Company Website: 4/3/2017	No*	4/3/2017	4/3/2017
1/23/2017 8:00 A	1/23/2017 12:00 P	4Hrs 0Mins	92 River Rd., Gadsden, AL	2400	Company Website: 1/23/2017	No*	1/23/2017	1/23/2017
1/23/2017 8:00 A	1/23/2017 12:00 P	4Hrs 0Mins	124 River Rd., Gadsden, AL	720	Company Website: 1/23/2017	No*	1/23/2017	1/23/2017
12/21/2016 8:00 A	12/21/2016 11:00 A	3Hrs 0Mins	101 Commerce Pkwy, Gadsden, AL	540	Company Website: 12/21/2016	No*	12/21/2016	12/21/2016
12/7/2016 8:00 A	12/7/2016 11:00 A	3Hrs 0Mins	301 S 11th St, Gadsden, AL	540	Company Website: 12/7/2016	No*	12/7/2016	12/7/2016
11/2/2016 10:00 A	11/2/2016 1:00 P	3Hrs 0Mins	4644 Airport Rd, Gadsden, AL	1800	Company Website: 11/2/2016	No*	11/2/2016	11/2/2016

\* The SSO report submitted by the Defendant indicates that the State Health Department was notified of the SSO event.

*Composite sample:* A sample consisting of several effluent portions collected during a specific time period and combined to make a representative sample.

*Composite sewage:* Sewage consisting of several effluent portions **collected from various discharge** lines at a common point.

*Cooling water:* The water discharged from any system of condensation such as air conditioning, cooling or refrigeration.

*Direct discharge:* The discharge of treated or untreated wastewater directly into the waters of the State of Alabama. <sup>1</sup>

*Domestic sewage:* That liquid waste from bathrooms, toilet rooms, kitchens and home laundries.

*Domestic user:* Any user not covered under the definition of industrial user.

*Effluent:* Wastewater flowing out of a POTW reservoir, basin or industrial treatment plant.

*Environmental protection agency or EPA:* The U.S. Environmental Protection Agency, or, where appropriate, the term may also be used as a designation for the administrator or other duly authorized official of said agency.

*Flow rate:* The quantity of waste or liquid that flows in a certain period of time.

*Flow volume:* The quantity of waste or liquid.

*Garbage:* Solid waste from the domestic and commercial preparation, cooking and dispensing of food; and from the handling, storage and sale of produce.

*General manager:* The chief executive officer of the water board or such officer's authorized deputy, agent or representative.

*Grab sample:* A sample which is taken from waste stream on a one-time basis with no regard to the flow in the waste stream and without consideration of time.

*Groundwater:* Water within the earth that supplies wells and springs.



*Holding tank waste:* Any waste from holding tanks such as vessels, chemical toilets, campers, trailers, septic tanks and vacuum **pump tank trucks**.

*Indirect discharge.* The discharge or the introduction of nondomestic pollutants from any source regulated under Section 307(b) or (c) of the Act (33 U.S.C., Section 1317(b) or (c)) into the POTW, including holding tank waste discharges into the system.

*Industrial user.* Any industrial or commercial establishment with a classification as designated in the "Standard Industrial Classification Manual," 1972 edition, as published by the executive office of the President of the United States, and who utilizes the services of the water board.

*Industrial waste:* The liquid, solid, and gaseous waste, including suspended solids, resulting from the processes employed in industrial or commercial establishments.

*Industrial waste surcharge:* A charge, as outlined in the latest edition of the water board's water and sanitary sewer rate schedule, levied on industrial users of the POTW for the additional cost of treating waste discharges of abnormal strength sewage. This charge includes capital and operation and maintenance costs.

*Interference:* The inhibition or disruption of the POTW treatment processes or operations which contributes to a violation of any requirement of the water board's NPDES permit. The term includes prevention of sewage sludge use or disposal by the POTW in accordance with section 405 of the Act (33 U.S.C. 1345); or any criteria, guidelines, or regulations developed pursuant to the Solid Waste Disposal Act (SWDA), the Clean Air Act, the Toxic Substances Control Act, or more stringent state criteria (including those contained in any state sludge management plan prepared pursuant to Title IV of SWDA) applicable to the method of disposal or use employed by the POTW.

*Lateral sewer:* A sewer that discharges into a collecting sewer or **other sewers and has no** other common sewer tributary to it.

*Main sewer:* A sewer that receives wastewater from the collecting sewer.

Mg/l: Milligrams per liter.

National categorical pretreatment *standards or* pretreatment *standard*: Any regulation containing pollutant discharge limits promulgated by the **EPA in accordance with section 307(b) and (c)** of the Act (33 U.S.C. 1347), which applies to a specific category of industrial users.

*National prohibitive discharge standard or prohibitive discharge standard*: Any regulation developed under the authority of 307(c) of the Act and 40 CFR, section 403.5.

*Natural outlet*: Any outlet into a watercourse, pond, ditch, lake or other body of surface **or groundwater**.

*New source*: Any source, the construction of which is commenced after the publication of proposed regulations prescribing section 307(c) (33 U.S.C. 1347) categorical pretreatment standard which will be applicable to such a source, if such standard is thereafter promulgated within one hundred twenty (120) days of proposal in the Federal Register. Where the standard is promulgated later than one hundred twenty (120) days after proposal, a new source means any source, the construction of which is commenced after the date of promulgation of the standard.

*Normal strength sewage*: Sewage which, when analyzed by the water board, shows by weight a daily average of not more than two thousand eighty-five (2,086) pounds per million gallons (250 parts per million) of suspended solids; and not more than two thousand eighty-five (2,085) pounds per million gallons (250 parts per million) of BOD, and which is otherwise acceptable into a public sewer under the terms of these regulations.

*NPDES*: The national pollutant discharge elimination system. A permit which is issued pursuant to section 402 of the Act (33 U.S.C. 1342).

*Objectionable waste*: Any wastes that can harm either the sewers, sewer treatment process or equipment, have an adverse effect on the receiving stream, or otherwise endanger life, health or property, or constitute a nuisance.

*Person*: As defined in section 1-2, specifically including a city, county, town, village or sewer district.

pH. The logarithm of the reciprocal of the weight of hydrogen ions in gram moles per liter of solution as determined by acceptable laboratory procedures.

*Point of discharge:* Any discernible, confined and discrete conveyance/conduit or vessel from which pollutants are or may be discharged into a public waterway or POTW.

Pollutant, Dredged spoil, solid waste, incinerator residue, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials, heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal and agricultural waste discharged into water.

*Polluted water or waste:* Any water, liquid or gaseous waste containing any of the following: Soluble or unsoluble substances of organic or inorganic nature which may deplete the dissolved oxygen content of the receiving stream; settleable solids that may form sludge deposits; grease and oils; floating solids which may cause unsightly appearance; color; phenols and other substances to an extent which would impart any taste or odor to the receiving stream; and toxic or poisonous substances in suspension, colloidal state, solution or gases.

Ppm: Parts per million.

*Pretreatment or treatment:* The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater to a less harmful state prior to or in lieu of discharging or otherwise introducing such pollutants into a POTW. The reduction or alteration can be obtained by physical, chemical or biological processes, or process changes by other means, except as prohibited by 40 CFR, section 403.6(d).

*Pretreatment requirements:* Any substantive or procedural requirement related to pretreatment other than a national pretreatment standard imposed on an industrial user.

*Properly shredded garbage:* The wastes from the preparation, cooking and dispensing of foods that have been shredded to such a degree that all particles will be carried freely under the flow conditions normally prevailing in public sewers, with no particle greater than one-half (1/2) inch (1.27 centimeters) in any dimension.



*Publicly owned treatment works (POTW):* Treatment works as defined by section 212 of the Act (33 U.S.C. 1292), which is owned, in this instance, by the water board. This definition includes any sewers that convey wastewater to the POTW treatment plant, but does not include pipes, sewers or other conveyances not connected to a facility providing treatment. For the purposes of this article, "POTW" shall also include any sewers that convey wastewaters to the **POTW from persons outside the city who are, by contract or agreement with the water board, users** of the water board's POTW.

*Publicly owned treatment works (POTW) treatment plant:* That portion of the POTW designed to provide treatment to wastewater.

*Receiving waters:* A natural watercourse or body of water into which treated or untreated sewage is discharged.

*Sewage:* A combination of the water-carried wastes from residences, business buildings, institutions and industrial establishments, together with such ground, surface and stormwaters as may be present.

*Sewer.* A pipe or conduit for carrying sewage.

*SID:* The state indirect discharge permit, a permit issued by AWIC to a significant industrial user of the POTW as detailed in the agreement.

*Significant industrial user.* Any industrial user of the water board's POTW treatment plant which: (1) has a discharge flow of twenty-five thousand (25,000) gallons or more per average work day; (2) has a flow greater than five (5) per cent of the hydraulic or organic design capacity of the water board's POTW treatment plant; (3) has in its wastes toxic pollutants as defined pursuant to Section 307 of the Act or Alabama statutes or rules; or (4) is found by the water board, Alabama Department of Environmental Management or the Environmental Protection Agency to have significant impact, either singly or in combination with other contributing industries, on the wastewater treatment system, the quality of sludge, the system's effluent quality or air emissions generated by this system.

*Significant violation:* A violation which: (1) remains uncorrected forty-five (45) days after notification of noncompliance; (2) is part

of a pattern of noncompliance over a twelve-month period; or (3) involves a failure to accurately report noncompliance.

**Slug:** Any discharge of water, sewage or industrial waste which, in concentration of any given constituent or in quantity of flow, exceeds for any period of duration longer than fifteen (15) minutes more than five (5) times the average twenty-four (24) hour concentration or flow during normal operation.

**Standard industrial classification (SIC):** A classification pursuant to the standard industrial classification manual issued by the executive office of the President, Office of Management and Budget, 1972.

**Standard methods:** "Standard Methods for the Examination of Water and Wastewater," prepared and published jointly by the American Public Health Association, American Waterworks Association and the Water Pollution Control Federation, latest edition.

**Storm drain** (sometimes termed *storm sewer*): A public sewer which carries storm and surface waters and drainage, but is not intended to carry sewage and industrial wastes, other than unpolluted cooling water.

**Stormwater:** Excess water which is derived from precipitation. This would include surface water.

**Surface water:** The source of water which occurs when the rate of precipitation exceeds the rate at which water may infiltrate into the soil.

**Suspended solids:** Solids that either float on the surface of, or are in suspension in water, sewage, or other liquids, and which are removable by **acceptable laboratory procedures**.

**Total suspended solids:** All of the suspended solids as described in the definition of "suspended solids" herein.

**Toxic pollutant:** Any pollutant or combination of pollutants listed as toxic in regulations promulgated by the administrator of the environmental protection agency under the provision of Clean Water Act 307 (a) or other acts.

Unpolluted water: Water which is free of any polluted water or waste as described in the definition of "polluted water or waste" herein.

User: Any person who contributes, causes or permits the contribution of wastewater into the water board's POTW.

User charge: A charge levied on users of the POTW for the capital cost, as well as the operation and maintenance of such works as outlined in the latest edition of the water board's water and sanitary sewer rate schedule.

Wastewater: The spent water of a community from the standpoint of source; it may be a combination of the liquid and watercarried wastes from residences, commercial buildings, industrial plants and institutions, together with any groundwater, surface water and storm water that may be present. In recent years the word wastewater has taken precedence over the word sewerage.

Water board: The water works and sewer board of the city.

Watercourse . A channel in which a flow of water occurs, whether continuously or intermittently. (Ord. No. 0-28-81, Art. I, §§ 1-76, 7-2-81; Ord. No. 0-51-83, §§ 1, 2, 6-23-83)

**See. 16-40. Connection to sewer system-Required.**

The owner of any property available to sewers is required to connect with the sewer system all water closets, urinals, sinks, lavatories, laundry tubs, bathtubs and other fixtures of whatever kind and character from which water is wasted on such property. It shall be unlawful for the owner of any property available to sewers to keep or maintain any surface closets, dry closets or cesspools upon such property, or to keep or maintain upon any such property any fixture from which water is wasted and which is not connected with the sewer system. (Code 1966, § 38-2; Ord. No. 0-28-81, Art. III, § 1, 7-2-81)

Cross reference-Required facilities, if 6-141, 14-6 et seq.

**Sec. 16-41. Same-Notice requiring.**

(a) In the event the owner of any property available to sewers does not cause the required connection of such property to the sewer system to be made, the board shall issue a written notice to



such owner to connect such property to the sewer system. Such notice shall be delivered to the chief of police and shall be personally served by the chief of police or by a member of the police department designated by the chief, and such officer shall make personal service as directed in the notice and shall make due return of service thereon to the board and such return shall be prima facie evidence of such notice.

(b) Whenever any notice to a resident owner of property available to sewers is returned "not found," the board shall prepare and issue alias notices to be served as in case of the original notice; two (2) returns of "not found" to such a resident owner shall authorize the board to proceed to give notice to such resident owner in the manner provided for nonresident owners of property available to sewers.

(c) In the event the owner of any property to whom the notice is required to be given is a nonresident, notice shall be given to such owner: (1) by publication once a week for three (3) consecutive weeks in a newspaper published in the city, (2) by mailing a copy of such notice to such owner at such owner's last known address, and (3) by delivering a copy of such notice to the agent or occupant of such property, which delivery of a copy shall be made by the officer and due return thereof made to the board. (Code 1966, § 38-3)

**Sec. 16-42. Same-Making by city.**

In the event any owner of property available to sewers fails or refuses to connect such property to the sewer system within ten (10)

days following the date the notice provided above is given, the city may make such connection, or cause such connection to be made, at the expense of such owner. The cost of making such connection shall constitute a lien upon such property in favor of the city, prior and superior to all liens other than liens for taxes, to be collected as other debts are collected and liens enforced. (Code 1966, § 38-4)

**Sec. 16-43. Same-Assessment of cost; filing lien.**

In the event property available to sewers is connected to the sewer system by the city pursuant to the provisions of section 16-42, the city commission shall thereafter adopt a resolution or ordinance assessing the cost or expenses of making such connection against such property. Promptly after the adoption of such ordinance or resolution, the chairman of the commission shall prepare a statement in writing, setting forth the name of the owner of such property and a description of such property and stating the cost of connecting such property with the sewer system. Such statement shall be signed by the chairman of the commission in such chairmans official capacity and filed with the judge of probate of the county, for ' record in the mortgage records of the county. The filing of such statement shall operate as notice of such lien from the date of its filing. (Code 1966, § 38-5)

Cross reference-See also § 16-57 et seq.

**Sec. 16-44. Drains and water closets connected to sewer system to be kept in good condition, etc.**

It shall be unlawful for the owner or person in control of any premises to permit any drain or water closet on such premises to remain connected with the sewer system if such drain or water closet is not in good and sanitary operating condition. It shall be unlawful for the owner or person in control of any premises to permit any water closet on such premises that is connected with the sewer system to be used or remain connected therewith without a proper supply of water being available at all times to flush such water closet; and when any drain or water closet is out of repair the same shall be put in good order and repair without delay. (Code 1966, § 38-6)

**Sec. 16-45. Back-up valves required in sanitary sewer service lines.**

The owner of any premises upon which there is now or hereafter located a sanitary sewer service line, shall install or have installed in such sanitary sewer service line a back-up valve, and shall maintain such back-up valve in good working condition. (Code 1966, § 38-7)

**Sec. 16-46. Purpose and objectives of article.**

The purpose of this article is to provide for the maximum possible beneficial public use of the water board's POTW through regulation of sewer construction, sewer use and industrial wastewater discharges, to provide for equitable distribution of the water board's cost, and to provide procedures for complying with the requirements contained herein. Furthermore, this article sets forth uniform requirements for direct and indirect contributors into the POTW and enables the water board to comply with all applicable state and federal laws required by the Clean Water Act of 1977 and the General Pretreatment Regulations (40 CFR, Part 403). The objectives of this article are:

- (1) To prevent the introduction of pollutants into the POTW which will interfere with the operation of the system or contaminate the resulting sludge;
- (2) To prevent the introduction of pollutants into the POTW treatment plant which will pass through the system, inadequately treated, into receiving waters or the atmosphere or otherwise be incompatible with the system;
- (3) To improve the opportunity to recycle and reclaim wastewaters and sludges from the POTW treatment plant;
- (4) To provide for equitable distribution of the cost of the POTW.

This article provides for the regulation of direct and indirect contributors to the municipal wastewater system through the memorandum of agreement between the water board and the AWIC; and, through enforcement of general requirements for the other users, authorizes monitoring and enforcement activities, requires user reporting, assumes that existing customer's capacity will not be preempted, and provides for the setting of fees for the equitable distri



bution of costs resulting from the program established herein. (Ord. No. 0-28-81, Art. II, § 1, 7-2-81)

**See. 16-47. Scope of article.**

This article shall be interpreted in accordance with the definitions set forth in section 16-39. The provisions of this article shall apply to the direct or indirect discharge of all liquid carried waste to facilities of the water board. This article, among other things, provides for the regulation of sewer construction in areas within the jurisdiction of the water board, the quantity mid quality of discharge of wastes, the degree of waste pretreatment required, the setting of waste discharge fees to provide for equitable distribution of costs, issuance of permits for industrial wastewater, and the establishment of surcharges and other procedures in cases of violation of these regulations. (Ord. No. 0-28-81, Art. II, § 2,7-2-81)

**Sec. 16-48. Area affected by article.**

These regulations shall apply to the city and those users outside the city who are, by contract or agreement with the water board, users of the board's POTW. (Ord. No. 0-28-81, Art. H, § 3,7-2-81)

**Sec. 16-49. Administration.**

Except as otherwise provided herein, the general manager of the water board shall administer, implement and enforce the provisions of these regulations. (Ord. No. 0-28-81, Art. II, § 4, 7-2-81)

**See. 16-50. Violation of article-Special surcharge assessment; suit for damages.**

Every person violating any provision of this article, including the failure to pay any fees, charges or surcharges imposed hereby, shall be assessed a special surcharge as provided in the water board's water and sanitary sewer rate schedule.

Each day during which any violation continues shall constitute a separate violation. A day shall consist of a twenty-four-hour period beginning at 12:01 a.m. and ending the following 12:01 a.m.

The general manager may, upon authorization by the water board, sue to recover any amounts due the board under the provisions of these regulations.

Any person who violates any provision of these regulations pertaining to the subject matter of either subparagraphs (1) or (2) below shall be assessed a special surcharge as provided in the water board's water and sanitary sewer rate schedule:

- (1) Under this article, the pretreatment of any industrial waste which would be detrimental to the treatment works, or its proper and efficient operation and maintenance, is required as set forth in section 16-80.
- (2) Under this article, the prevention by the user of the entry of such untreated wastewater into the POTW is required. When, in the opinion of the water board or the governmental agencies having jurisdiction in the matter, a violation of this article is of such a nature as to be likely to cause damage to POTW of the water board or a menace to the health or safety of the inhabitants of any areas served, the water board may forthwith discontinue and sever any connections with its sewerage system. (Ord. No. 0-28-81, Art. 11, § 5, 7-2-81)

**Sec. 16-51. Same-Notice.**

Any person found in violation of this article or of any limitation or requirement of a permit issued hereunder shall be served with a written notice stating the nature of the violation and provided a reasonable time limit for the satisfactory correction thereof. If satisfactory corrective action is not taken in the time allotted, action to implement section 16-50 may be taken.

Unless otherwise provided herein, any notice required to be given under this article shall be in writing and served in person or by certified mail. The notice shall be sent to the last known address of the violator. Where the address is unknown, service may be made upon the owner of record of the property involved, according to the records of the tax assessor of the county. (Ord. No. 0-28-81, Art. 11, § 6, 7-2-81)

**Cross reference-See also § 16-92.**

**Sec. 16-52. Same-Extension of time limits.**

Any time limit provided in any written notice or in any provision of this article may be extended only by a written directive of the water board. (Ord. No. 0-28-81, Art. II, § 7, 7-2-81)

**Sec. 16-53. Questionnaire-New industrial wastewater discharges.**

All persons desiring to discharge industrial wastewater to the water board's POTW must first complete an industrial waste questionnaire and submit the questionnaire to the water board for review. If, after review by the general manager and ADEM as noted in the agreement, the industry is found to be subject to the federal or state pretreatment program, then that person must obtain a state indirect discharge (SID) permit. (Ord. No. 0-28-81, Art. 11, § 8, 7-2-81)

**Sec. 16-54. Same-Existing industrial -wastewater discharges.**

All persons discharging industrial waste water directly or indirectly to the water board's POTW prior to the effective date of the ordinance from which this section is derived and who have obtained prior approval of the industrial wastewater discharge, must complete the industrial waste questionnaire as required under section 11 of the agreement. If, after review by the water board and AWIC as noted in the agreement, the industry is found to be subject to the federal and state pretreatment program, then that industry must obtain a state indirect discharge (SID) permit within the required time frame established by EPA and AWIC. (Ord. No. 0-28-81, Art. 11, § 9, 7-2-81)

**Sec. 16-55. Pretreatment standards.**

In compliance with the Act, these regulations adopt and use as a guide the national pretreatment standards and the environmental protection agency's pretreatment guidelines. The water board recognizes that in some cases these pretreatment standards may not be sufficient to protect the operation of its treatment works, or make it unable to comply with terms of its NPDES permit. In such cases, the water board reserves the right to impose more stringent pretreatment standards than those specified in the EPA regulations. (Ord. No. 0-28-81, Art. 11, § 10, 7-2-81)

**Sec. 16-56. Right-of-entry.**

The authorized representative of the water board, EPA and AWIC representatives, bearing proper credentials and identification, shall



be permitted to enter upon all properties for the purpose of inspection, observation, measurements, sampling and testing in accordance with the provisions of these regulations. (Ord. No. 0-28-81, Art. II, § 11,7-2-81)

**Sec.- 16-57. Construction of building connections.**

Building service sewers to residential, commercial or industrial buildings shall be constructed in accordance with applicable ordinances and with the plumbing code of the city, as the same may be amended from time to time, and all other sewer construction shall be governed by said code and other ordinances. (Ord. No. 0-28-81, Art. 111, § 2,7-2-81)

**Sec. 16-58. Private disposal system.**

Where a public sanitary sewer is not available, a private sewage disposal system shall be required, and shall be installed in accordance with all laws of the state, ordinances of the city and regulations of the state department of public health. (Ord. No. 0-28-81, Art. III, § 3,7-2-81)

**Sec. 16-59. Permit required for uncovering, etc.**

No person shall uncover, make any connections with or opening into, use, alter, or disturb any public sewer or appurtenance thereof without first obtaining a written permit from the city plumbing inspector and/or the water board for such connection as required under 16-79. (Ord. No. 0-28-81, Art. IV, § 1, 7-2-81)

**Sec. 16-60. Inspection; acceptance of sewer by water board.**

No sewerage facility, other than building service sewers, shall be constructed in the city except by the water board, or by others in accordance with plans and specifications approved by the water board, and subject to inspection during construction by consulting engineers and employees of the water board. No. sanitary sewer shall be considered to be a part of the public sewerage system of the water board unless the water board duly adopts a resolution of completion and acceptance thereof. (Ord. No. 0-28-81, Art. IV, § 2,7-2-81)

**Sec. 16-61. Expiration of plans approval.**

An approval of plans for construction of sewerage facilities shall expire one year after the date of approval unless construction has been initiated within one year and completed within a reasonable time thereafter. (Ord. No. 0-28-81, Art. IV, § 3,7-2-81)

**Sec. 16-62. Responsibility for connection costs; indemnification.**

All costs and expense incidental to the installation and connection of the building service sewer shall be borne by the owner. The owner shall indemnify the city and the water board from any loss or damage that may directly or indirectly be occasioned by the installation of the building service sewer. (Ord. No. 0-28-81, Art. IV, § 4, 7-2-81)

**Sec. 16-63. Separate connections.**

A separate and independent building service sewer shall be provided for every building in residential and commercial areas, except that where one building stands at the rear of another on an interior lot, and no private sewer is available, or can be constructed to the rear building through an adjoining alley, court, yard, or driveway, the building service sewer from the front building may be extended to the rear building and the whole considered as one building service sewer. (Ord. No. 0-28-81, Art. IV, § 5, 7-2-81)

**Sec. 16-64. Building service sewers specifications.**

The size, slope, alignment, materials of construction of a building service sewer, and the methods to be used in excavating, placing of the pipe, joining, testing and backfilling the trench, shall all conform to the requirements of the building and plumbing codes or other applicable rules and regulations of the city. (Ord. No. 0-28-81, Art. IV, § 6,7-2-81)

**Sec. 16-65. Elevation of sewers.**

Whenever possible, the building service sewer shall be brought to the building at an elevation. below -the basement floor. In all building in which below-floor building drains are too low to permit gravity flow to the public sewer, sanitary sewage carried by such build

ing drains shall be lifted by means established in standard engineering practice to a suitable level and then discharged to the building service sewer, or the building drain may be hung on the cellar wall and shall not be less than four (4) inches in diameter. (Ord. No. 0-28-81, Art. IV, § 7,7-2-81)

**See. 16-66. Connection of roof and foundation drains.**

No person shall make connection of roof downspouts, exterior foundation drains, areaway drains, or any other sources of surface runoff or groundwater to a building service sewer or building drain which in turn is connected directly or indirectly to a POTW. (Ord. No. 0-28-81, Art. IV, § 8,7-2-81)

**See. 16-67. Public safety measures.**

All excavations for building service sewer installation shall be adequately guarded with barricades and lights so as to protect the public from hazard. Streets, sidewalks, parkways and other public property disturbed in the course of the work shall be restored by the permittee in a manner satisfactory to the water board. (Ord. No. 0-28-81, Art. IV, § 9,7-2-81)

**See. 16-68. Approval of industrial wastewater discharges required.**

No industrial wastewaters shall be discharged to the POTW, directly or indirectly, until a permit for industrial wastewater discharge has been approved by the water board in accordance with section 16-79; and if the discharger is a significant industrial user as defined in section 16-39, a state indirect discharge (SID) permit must be obtained from AWIC as outlined under the agreement. (Ord. No. 0-28-81, Art. V, § 1, 7-2-81)

**See. 16-69. Discharge of waters not containing sewage.**

The discharge of waters not containing sewage is prohibited. Except with the approval of the water board, or as otherwise provided in this article, no storm water connection from any building or yard, nor any drain from any catch basin, lake, swamp, pond or swimming pool, nor any outlet for surface water, storm water or groundwater of any kind shall be connected to the water board's



POTW. Storm water runoff from limited areas, which storm water may be polluted at times, may be discharged to the POTW by permission of the general manger.

Within any area served by a separate sanitary sewer and a storm sewer, no storm water shall be allowed to enter soil, waste or vent pipes from any building. Within any such area no downspout, roof leaders, gutters, other pipes, or drains such as channels which may at any time carry storm water surface drainage derived from hydraulic pressure or from well points, cooling water or lake water, shall be connected with any sanitary sewer; but must be connected to said storm sewer. (Ord. No. 0-28-81, Art. V, § 2,7-2-81)

**Sec. 16-70. Discharge to a storm sewer or natural outlet.**

It is prohibited to discharge to any storm sewer or natural outlet within the city limits any sewage or other polluted waters, except where suitable treatment has been provided in accordance with the provisions of this article; and except where a national pollutant discharge elimination systems (NPDES) permit has been duly issued and is currently valid for such discharge. A valid copy of such a permit with any modifications thereof must be filed with the water board for an exception under this section. (Ord. No. 0-28-81, Art. V, § 3,7-2-81)

**Sec. 16-71. General discharge prohibitions.**

No user shall contribute or cause to be contributed, directly or indirectly, any pollutant or wastewater which will interfere with the operation or performance of the POTW. These general prohibitions apply to all such users of the POTW whether or not the use is subject to National Categorical Pretreatment Standards or any other national, state or local pretreatment standards or requirements. A user may not contribute the following substances to any POTW:

- (1) Any liquids, solids or gases which by reason of their nature or quantity are, or may be, sufficient, either alone or by interaction with other substances, to cause fire or explosion or be injurious in any way to the POTW or to the operation of the POTW. At no time shall two (2) successive readings on an explosion hazard meter at the point of dis

charge into the system (or at any point in the system) be more than five (5) percent nor any single reading over ten (10) percent of the lower explosive limit (LEL) of the meter. Prohibited materials include, but are not limited to, gasoline, kerosene, naphtha, but are not limited to, gasoline, kerosene, naphtha, benzene, toluene, xylene, ethers, alcohols, ketones, aldehydes, peroxides, chlorates, perchlorates, bromates, carbides, hydrides and sulfides and any other substances which the water board, Alabama Department of Environmental Management or EPA has notified the user is a fire hazard or a hazard to the system.

- (2) Any wastewater having a total suspended solids concentration greater than two hundred fifty (250) mg/l as a monthly average or a daily concentration of greater than five hundred (500) mg/l as a maximum value. Solid or viscous substances which may cause obstruction to the flow in a sewer or other interference with the operation of the wastewater treatment facilities such as, but not limited to, grease, garbage with particles greater than one-half inch in any dimension, animal guts or tissues, paunch manure, bones, hair, hides or fleshings, entrails, whole blood, feathers, ashes, cinders, sand, spent lime, stone or marble dust, metal, glass, straw, shavings, grass clippings, rags, spent grains, spent hops, waste paper, wood, plastics, gas, tar, asphalt residues, residues from refining or processing of fuel or lubricating oil, mud, or glass grinding or polishing wastes.
- (3) Any wastewater having a pH less than 5.0 or having a pH higher than 9.5, or wastewater having any other corrosive property capable of causing damage or hazard to structures, equipment and/or personnel of the water board's POTW.
- (4) Any wastewater containing toxic pollutants in sufficient quantity, either singly or by interaction with other pollutants, to damage or interfere with any wastewater treatment process, constitute a hazard to humans or animals, create a toxic effect in the receiving waters of the POTW, or to exceed the limitation set forth in a categorical pre

treatment standard. Toxic pollutants include, but are not limited to, Nitrogen, either as ammonia nitrogen (not to exceed fifteen (15) mg/l) or total Kjeldahl nitrogen (not to exceed thirty (30) mg/l), or any pollutant identified pursuant to section 307(a) of the Clean Water Act. Certain metals in sufficient concentration may also be deemed toxic. The concentration of metals will be dealt with on a case. by-case basis.

- (5) Any noxious or malodorous liquids, gases or solids which, either singly or by interaction with other wastes, are sufficient to create a public nuisance or hazard to life or are sufficient to prevent entry into the sewers for maintenance and repair.
- (6) Any substance which may cause the POTW's effluent or any other product of the POTW, such as residues, sludges or scums, to be unsuitable for reclamation and reuse or to interfere with the reclamation process. In no case shall a substance discharged to the POTW cause the POTW to be in noncompliance with sludge use or disposal criteria, guidelines or regulations developed under section 405 of the Act; any criteria, guidelines or regulations affecting sludge use or disposal developed pursuant to the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act; or state criteria applicable to the sludge management method being used.
- (7) Any substance which will cause the POTW to violate its NPDES permit or the receiving water quality standards.
- (8) Any wastewater with objectionable color not removed in the treatment process, such as, but not limited to, dye wastes and vegetable tanning solutions.
- (9) Any wastewater having a temperature which will inhibit biological activity in the POTW treatment plant resulting in interference, but in no case wastewater with a temperature which exceeds forty (40) degrees Celsius (104\* F.) at the introduction into the POTW unless the POTW treatment plant is designed to accommodate such temperature.
- (10) Any water or waste containing fats, wax, grease or oils, whether emulsified or not, in excess of one hundred (100)



mg/l total; or containing substances which may solidify or become viscous at temperatures between' thirty-two (32) degrees Fahrenheit or zero (0) degrees Celsius and one hundred fifty (150) degrees Fahrenheit or sixty-five (65) degrees Celsius.

- (11) Any pollutants, including oxygen-demanding pollutants, released at a flow rate and/or pollutant concentration which a user knows, or has reason to know, will cause interference to the POTW. The oxygen-demanding pollutant concentration shall not exceed two hundred fifty (250) mg/l as five-day BOD or five hundred (500) mg/l as COD as a monthly average, or five hundred (500) mg/l as five-day BOD or one thousand (1,000) mg/l as COD as a daily maximum. In no case shall a slug load have a flow rate or contain concentration or qualities of pollutants that exceed for any time period longer than fifteen (15) minutes more than four (4) times the monthly average concentration limit.
- (12) Any wastewater containing any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the general manager in compliance with applicable state or federal regulations.
- (13) Any wastewater which causes a hazard to human life or creates a public nuisance.

When the general manager determines that a user is contributing to the POTW any of the above-enumerated substances in such amounts as to interfere with the operation of the POTW, the general manager shall advise the user of the impact of the contribution on the POTW and develop effluent limitations for such user to correct the interference with the POTW. (Ord. No. 0-28-81, Art. V, § 4, 7-2-81; Ord. No. 0-93-90, 11-14-90)

#### **Sec. 16-72. Federal categorical pretreatment standards.**

Upon the promulgation of the federal categorical pretreatment standards for a particular industrial subcategory, the federal standard, if more stringent than limitations imposed under this article for sources in that subcategory, shall immediately supersede the limitations imposed under this article. The general manager shall

notify all affected users of the applicable reporting requirements under 40 CFR, section 403.12. (Ord. No. 0-28-81, Art. V, § 5, 7-2-81)

**Sec. 16-73. State requirements on discharges.**

State requirements or limitations on discharges shall apply in any case where they are more stringent than federal requirements and limitations or those in this article. (Ord. No. 0-28-81, Art. V, § 6, 7-2-81)

**Sec. 16-74. Water board's right of revision of discharge requirements.**

The water board reserves the right to establish by ordinance more stringent limitations or requirements on discharges to the wastewater disposal system, if deemed necessary, to comply with the objectives presented in section 16-46. (Ord. No. 0-28-81, Art. V, § 7, 7-2-81)

**Sec. 16-75. Excessive discharge.**

No user shall ever increase the use of process water or, in any way, attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with the limitations contained in the federal categorical pretreatment standards, or in any other pollutant-specific limitations developed by the water board, EPA or AWIC. (Comment: Dilution may be an acceptable means of complying with some of the prohibitions set forth in section 16-71(3), e.g., the pH prohibition.) (Ord. No. 0-28-81, Art. V, § 8,7-2-81)

**Sec. 16-76. Accidental discharges.**

In the case of an accidental discharge, it is the responsibility of the user to immediately telephone and notify the water board of the incident. The notification shall include location of discharge, type of waste, concentration and volume, and corrective action.

- (1) *Written notice.* Within five (5) days following an accidental discharge, the user shall submit to the water board a detailed written report describing the cause of the discharge and measures to be taken by the user to prevent similar future occurrences. Such notification shall not relieve the user of any expense, loss, damage, or other liability which may be incurred as a result of damage to the POTW, fish kills, or any other damage to person or property; nor shall such notification relieve the user of any fines, civil penalties, or other liability which may be imposed by this article or other applicable law.
- (2) *Notice to employees:* A notice shall be permanently posted on the user's bulletin board or other prominent place advising employees whom to call in the event of a dangerous discharge. Employers shall insure that all employees who may cause or suffer such a dangerous discharge to occur are advised of the emergency notification procedure. (Ord. No. 0-28-81, Art. V, § 9,7-2-81)

**Sec. 16-77. Improper use of sewers.**

The water board hereby reserves the right to inspect any existing building service sewer and drain, lateral or collecting sewers that discharge wastewater directly or indirectly to the water board's



facilities. If it is found that such laterals or collecting sewers are used or maintained in such a way as to cause discharge of septic wastewater or ground water or debris which exceeds the design criteria of said sewer or any other substance deemed objectionable by the water board, the water board will give notice of the unsatisfactory condition to the discharger and shall direct that the condition be corrected. In case of continued noncompliance with the general manager's directive, the water board may disconnect the sewer from the water board's POTW. (Ord. No. 0-28-81, Art. V, § 10,7-2-81)

See. 16-78. Excessive sewer maintenance expense.

No person shall discharge or cause to be discharged to the water board's POTW, either directly or indirectly, any waste that creates a stoppage, plugging, breakage, any reduction in sewer capacity, or any other damage to sewers or sewerage facilities of the water board. Any additional sewer or sewerage maintenance expenses caused by such a discharge, or any other expenses attributable thereto will be charged to the discharger by the water board.

Any refusal to pay the additional maintenance expenses duly authorized by the water board will constitute a violation of this article. The charge shall be determined as outlined in the latest edition of the water board's water and sanitary sewer rate schedule. (Ord. No. 0-28-81, Art. V, § 11, 7-2-81)

**Sec. 16-79. Application for permit for industrial wastewater discharge; failure to obtain permit.**

Any person desiring to deposit or discharge, or who is now so doing, any industrial waste into the water board's POTW shall make application to the city plumbing inspector in the manner prescribed in the city plumbing code. It shall be the duty of the city plumbing inspector to refer all applications for the disposal of industrial waste to the water board. The general manager shall approve such applications only when evidence is submitted by the applicant that the discharge into the sanitary sewer will comply with all the provisions of this article. In addition, any nondomestic sewage user of the water board's POTW shall complete an industrial waste questionnaire. This questionnaire shall be submitted to

the water board for review and appropriate action as noted under section 11 of the agreement.

Should any person fail to secure a permit or fail to have such person's application approved, the water hoard may, upon twenty

When requested by the authorized representative of the industrial user furnishing a report, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available upon written request to governmental agencies for uses related to this article, the national pollutant discharge elimination system (NPDES) permit, state indirect discharge permit and/or the pretreatment programs; provided, - however, that such portions of a report shall be available for use by the state or any state agency in judicial review or enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics will not be recognized as confidential information.

Information accepted by the water board as confidential shall not be transmitted to any governmental agency or to the general public by the water board until and unless a ten-day notification is given to the industrial user. (Ord. No. 0-28-81, Art. VI, § 3, 7-2-81; Ord. No. 0-51-83, § 3, 6-23-83)

**Sec. 16-82. Significant changes in quantity and quality.**

No industrial user shall discharge industrial wastewaters in excess of the quantity or quality limitations set by its state indirect discharge permit and/or by the water board for industrial wastewater discharge. Any industrial user desiring to discharge wastewaters or use facilities which are not in conformance with its state indirect discharge permit must apply for approval through the general manager to AWIC for an amended permit. (Ord. No. 0-28-81, Art. VI, § 4, 7-2-81)

**Sec. 16-83. Prohibited waste discharges.**

In most cases, the concentration or amounts of any particular constituent which will be judged to be excessive or unreasonable cannot be foreseen, but will depend on the results of technical determination and action of regulatory agencies. A partial list of these constituents appear in sections 16-68 through 16-78. However, as new regulations and requirements are promulgated by federal and state authorities, they too will become part of this article. (Ord. No. 0-28-81, Art. VI, § 5, 7-2-81)



**Sec. 16-84. Industrial wastewater surcharge.**

An industry may be required to pay an industrial waste surcharge. The payment of the surcharge shall, at a minimum, occur annually. This surcharge will be required from those industrial wastewater dischargers whose contribution of compatible pollutants creates costs in excess of that normally created by a domestic user. The surcharge shall be based on the water board's annual debt service and total operating and maintenance cost for providing industrial wastewater collection, treatment and disposal services. The actual charges and formula for determining these charges are outlined in the water board's water and sanitary sewer rate schedule. (Ord. No. 0-28-81, Art. VI, § 6,7-2-81)

**Sec. 16-85. Pretreatment of industrial wastewaters.**

An industrial wastewater pretreatment system may be required by the water board to treat industrial flows prior to discharge to the water board's POTW when it is necessary to measure, sample, restrict or prevent the discharge to the sewer of certain waste constituents, to more equally distribute peak discharges of industrial wastewater, or to accomplish any pretreatment result required by the water board. All pretreatment systems shall be subject to the approval of the water board, but such approval shall not relieve the industrial dischargers of the responsibility of meeting any required industrial effluent limitations. All pretreatment systems shall be adequately engineered and designed to the satisfaction of the water board and all reports and plans shall have been prepared and signed by a professional engineer licensed in the state. (Ord. No. 0-28-81, Art. VI, § 7,7-2-81)

**Sec. 16-86. Control manhole.**

As a condition of these regulations, when required by the water board, the owner of any property serviced by a building service sewer carrying wastewater shall install a suitable control manhole with such meters and other appurtenances deemed necessary by the water board to adequately sample and measure the waste passing through the control manhole. This control manhole shall be located so as to permit unrestricted access by representatives of the water board. The control manhole may be used as a junction manhole for domestic sewage and industrial waste, providing the junction occurs

downstream of the sampling or flow measuring point. (Ord. No. 0-28-81, Art. VI, § 8,7-2-81)

**Sec. 16-87. Industrial wastewater sampling, analysis and flow measurements.**

Periodic measurements of flow rates, flow volumes, BOD, and suspended solids for use in determining the annual industrial wastewater treatment charges, and such measurements of other constituents deemed necessary by the water board, may be made on all industrial wastewater discharges. In addition, all significant industrial users designated by AWIC -as subject to the stated EPA pretreatment standards must comply with section IV(1), compliance assurance, of the agreement. All sampling, analysis and flow measurement of industrial wastewaters shall be performed by an independent laboratory or by a laboratory of an industrial discharger, approved by the water board.

If performed by the water board personnel, an appropriate charge shall be paid by the discharger requesting the tests. The charges are outlined in the latest edition of the water and sanitary sewer rate schedule. Prior to submittal to the water board of data developed in the laboratory of an industrial discharger, the results shall be verified by a responsible administrative official of the industrial firm or corporation.

All wastewater analysis shall be conducted in accordance with the appropriate procedure contained in EPA's "Methods of Analysis of Water and Wastes," (most recent edition) also known as "Standard Methods." If no appropriate procedure is contained therein, the standard procedure of the industry, or a procedure judged satisfactory by the general manager, shall be used to measure wastewater constituents. Any laboratory or any discharger performing tests shall furnish the required test data or information on the test methods or equipment used, if requested to do so by the water board.

All dischargers making periodic measurements shall furnish and install at the control manhole, or other appropriate location, a calibrated flume, weir, flow meter or similar device approved by the general manager, and suitable to measure the industrial wastewater flow rate and total volume. A flow register which indicates, records, and totalizes may be required by the water board. In lieu of waste

water flow measurement, the water board may accept records of water usage and adjust the flow volumes by suitable factors to determine peak and average flow rates for the specific industrial wastewater discharge.

The sampling, analysis and flow measurement procedures, equipment and results shall be subject at any time to inspection by the water board.

When required by the water board, dischargers shall install and maintain in proper order, automatic flow proportional sampling equipment and/or automatic analysis and recording equipment.

Measurements to verify the quantities of waste flows and waste constituents reported by industrial discharges will be conducted on a random basis by personnel of the water board as outlined under section IV(3) of the agreement. (Ord. No. 0-28-81, Art. VI, § 9, 7-281)

**Sec. 16-88. Discrepancies between actual and reported industrial wastewater discharge quantities.**

If erroneous data as reported to the water board by the discharger was used as a basis for an industrial waste treatment charge, the discharger shall be assessed for all delinquent charges, together with the additional surcharge provided for in section 16-50. Before additional charges shall be assessed at least two (2) additional twentyfour-hour samples and flow measurements shall be obtained by the water board or by another independent laboratory acceptable to both parties, with all cost of sampling and analysis to be paid by the discharger.

For the purpose of establishing the correct treatment surcharge, the data obtained in these samplings, along with any other relevant information obtained by the water board or presented by the discharger, shall be used by the water board in determining the quantity parameters for use in the formula. An industrial discharger found in violation shall, in the absence of other evidence, be presumed to have been discharging at the determined parameter values over the preceding year, or subsequent to the water board's previous verification of quantity parameters, whichever period is shorter. (Ord. No. 0-28-81, Art. VI, § 10, 7-2-81)



**Sec. 16-89. Damage caused by prohibited wastewater discharge.**

Any industrial wastewater discharger who discharges, or causes the discharge of, prohibited wastewater which causes damage to the water board's POTW, detrimental effects on treatment processes, or any other damages resulting in costs to the water board, shall be liable for all damages occasioned thereby. (Ord. No. 0-28-81, Art. VI, § 11, 7-2-81)

**Sec. 16-90. Public notification of significant violations.**

The water board shall annually publish in the local newspaper a list of the users which had a significant violation of any pretreatment requirements or standards during the twelve (12) previous months. The notification shall also summarize any enforcement actions against the user(s) during the same twelve (12) months.

All records relating to compliance with pretreatment standards shall be made available to officials of EPA or the approval authority upon request. (Ord. No. 0-28-81, Art. VI, § 12, 7-2-81; Ord. No. 0-51-83, § 4, 6-23-83)

**Sec. 16-91. Enforcement-Suspending service for harmful contributions.**

The water board may suspend the wastewater treatment service and, when in the opinion of the water board such suspension is necessary to stop an actual or threatened discharge which presents or may present an imminent or substantial endangerment to the health or welfare of persons or to the environment which causes interference to the POTW or which causes the water board to violate any condition of its NPDES permit.

Any person notified of a suspension of the wastewater treatment service shall immediately stop or eliminate the contribution. In the event of a failure of the person to comply voluntarily with the suspension order, the water board shall take such steps as deemed necessary, including immediate severance of the sewer connection, to prevent or minimize damage to the POTW system or endangerment to any individuals. The water board shall reinstate the wastewater treatment service upon proof of the elimination of the noncomplying discharge. A detailed written statement submitted Supp. No. 2

by the user describing the causes of the harmful contribution and the measures taken to prevent any future occurrence shall be submitted to the water board within fifteen (15) days of the date of occurrence. (Ord. No. 0-28-81, Art. VII, § 1, 7-2-81)

**Sec. 16-92. Same-Service of notification of violation.**

Whenever the water board finds that any user has violated or is violating this article or any prohibition, limitation of requirements contained herein, the water board may serve upon such person a written notice stating the nature of the violation. Within thirty (30) days of the date of the notice, a plan for the satisfactory correction thereof shall be submitted to the water board by the user. (Ord. No. 0-28-81, Art. VII, § 2, 7-2-81)

Cross reference-See also § 16-51.

**Sec. 16-93. Same-Show cause hearing.**

The water board may order any user who causes or allows an unauthorized discharge to enter the POTW to show cause before the water board why the proposed enforcement action should not be taken. A notice shall be served on the user specifying the time and place of a hearing to be held by the water board regarding the violation, the reasons the action is to be taken, the proposed enforcement action, and directing the user to show cause before the water board why the proposed enforcement action should not be taken. The notice of the hearing shall be served personally or by certified mail at least ten (10) days before the hearing. Service may be made on any agent or officer of a corporation.

The water board may itself conduct the hearing and take the evidence, or may designate any of its members or any officer or employee to:

- (1) Issue in the name of the water board notices of hearings requesting the attendance and testimony of witnesses and the production of evidence relevant to any matter involved in such hearings;
- (2) Take the evidence;
- (3) Transmit a report of the evidence and hearing, including transcripts and other evidence, together with recommendations to the water board for action thereon.

At any hearing held pursuant to this article, testimony taken must be under oath and recorded stenographically. The transcript, so recorded, will be made available to any member of the public or any party to the hearing upon payment of the usual charges thereof.

After the water board has reviewed the evidence, it may issue an order to the user responsible for the discharge directing that, following a specified time period, the sewer service be discontinued unless adequate treatment facilities, devices or other related appurtenances shall have been installed on existing treatment facilities, devices or other related appurtenances are properly operated. Such orders and directives as are necessary and appropriate may be issued. (Ord. No. 0-28-81, Art. VII, § 3, 7-2-81)

**Sec. 16-94. Same-Legal action.**

If any person discharges sewage, industrial wastes or other wastes into the water board's POTW contrary to the provisions of this article, federal or state pretreatment requirements, or any order of the water board, the water board's attorney may commence an action for appropriate legal and/or equitable relief in the appropriate court of this county. (Ord. No. 0-28-81, Art. VII, § 4, 7-2-81)

**Sec. 16-95. Same-Civil penalties.**

Any user who is found to have violated an order of the water board or who wilfully or negligently fails to comply with any provision of this article, and the orders, rules, regulations and permits issued hereunder, shall be fined not more than five hundred dollars (\$500.00) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. (Ord. No. 0-28-81, Art. VII, § 5, 7-2-81)

**Sec. 16-96. Same-Falsifying information.**

Any person who knowingly makes any false statements, representation or certification in any application, record, report, plan or other document filed or required to be maintained pursuant to this article, or SID permit, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this article, shall, upon conviction, be punished as provided in section 1-7. (Ord. No. 0-28-81, Art. VII, § 6, 7-2-81)



**Sec. 16-97. Fees-Purpose.**

It is the purpose of this chapter to provide for the recovery of costs from users of the water board's wastewater disposal system for the implementation of the program established herein. The applicable charges or fees shall be set forth in the water board's water and sanitary sewer rate schedule. (Ord. No. 0-28-81, Art. VIII, § 1, 7-2-81)

**Sec. 16-98. Same-Scope.**

The water board may adopt charges and fees which may include:

- (1) Fees for reimbursement of costs of setting upon and operating the water board's pretreatment program;
- (2) Fees for monitoring, inspections and surveillance procedures;
- (3) Fees for reviewing and accidental discharge procedures and construction;
- (4) Fees for filing appeals;
- (5) Other fees as the water board may deem necessary to carry out the requirements contained herein.

These fees relate solely to the matters covered by this article and are separate from all other fees chargeable by the water board.

All fees and industrial waste charges payable under the provisions of this article shall be paid to the water board. These charges shall be as outlined in the latest edition of the water board's water and sanitary sewer rate schedule.

Unless otherwise provided herein, whenever the fees and charges required by these regulations are based on estimated values or estimated quantities, the general manager shall make such determinations in accordance with estimating practices theretofore used by the water board.

All fees and charges imposed under the provisions of these regulations are due and payable upon receipt of the notice of charges. Unpaid charges shall become delinquent forty-five (45) days after mailing or delivering the notice of charges. A basic penalty charge of ten (10) per cent of the unpaid amount shall be added to any fee or charge that becomes delinquent. Interest at the rate of one (1) per

cent per annum shall accrue on the total of all delinquent charges, including the ten (10) per cent charge provided for herein. (Ord. No. 0-28-81, Art. VIII, § 2,7-2-81)

**See. 16-99. Superseding previous regulations.**

The provisions of this article governing sewer construction, sewer use and industrial wastewater discharges shall supersede all previous regulations of the water board. (Ord. No. 0-28-81, Art. IX, § 2,7-2-81)

**See. 16- 100. Other laws, rules and regulations.**

The provisions of this article are in addition to the applicable ordinances of the city, the codes and regulations of the county, and the laws, rules and regulations of the state and the United States. Where such laws, codes, ordinances, rules and regulations contain provisions more restrictive than those contained in this article, the former shall apply. (Ord. No. 0-28-81, Art. IX, § 3,7-2-81)

[The next page is 11891

**LANCE R. LEFLEUR**  
DIRECTOR



**KAY IVEY**  
GOVERNOR

Alabama Department of Environmental Management  
adem.alabama.gov

1400 Coliseum Blvd. 36110-2400 ■ Post Office Box 301463  
Montgomery, Alabama 36130-1463  
(334) 271-7700 ■ FAX (334) 271-7950

JUL 06 2021

MR CHAD HARE  
GENERAL MANAGER  
THE WATER WORKS & SEWER BOARD OF THE CITY OF GADSDEN  
POST OFFICE BOX 800  
GADSDEN AL 35902-0800

RE: Permit Renewal Notice  
NPDES Permit No. AL0053201  
**Gadsden West River WWTP**  
Etowah County, Alabama

Dear Mr. Hare:

Our records show that the above referenced permit will expire on **January 31, 2023**. If you wish to renew the permit, permit regulations require the submittal of two (2) copies of the completed application for reissuance and the appropriate processing fee in such a manner that the documents and fee arrive at the Department's Montgomery office no later than **August 5, 2022**, which is **180 days** before the permit expiration date. If the permit will no longer be required, the regulations require the submittal of a notice to that effect. The notice is required to be submitted no later than 180 days prior to permit expiration.

If a complete permit application and fee are received by the required date, NPDES regulations automatically extend the permit until such time as the Department is able to issue it. If a complete permit application with fee is not submitted prior to the required date and if the Department is unable to reissue the permit prior to the expiration date, the permit is not continued and any discharge after the expiration date is unpermitted. The discharge of wastewater without a permit is a serious violation that may result in legal action by others and/or in enforcement action by the Department or the Environmental Protection Agency.

The required application forms (EPA Form 2A, EPA Form 2B, EPA Form 2S, and ADEM Form 188) can be found on the Department's website at <http://www.adem.state.al.us/programs/water/waterforms.cnt>. **Please be aware there are new EPA forms.**

Please note that as of December 21, 2016, all Permittees are required to submit DMRs electronically. If not already enrolled in the Department's web-based electronic environmental (E2) reporting system, please submit a completed Permittee Participation Package (PPP) **immediately**. The PPP may be downloaded online at <https://e2.adem.alabama.gov/NPDES> or you may obtain a hard copy by submitting a written request or by emailing [e2admin@adem.alabama.gov](mailto:e2admin@adem.alabama.gov). Please note that a hard copy PPP with original signature must be submitted to the Department to complete the enrollment process.

The fees for water permits are listed in Fee Schedule D of our regulations under **ADEM Administrative Code r. 335-1-6-.07**, which can also be viewed on our website at <http://www.adem.state.al.us/alEnviroRegLaws/default.cnt>

Alabama Department of Environmental Management  
Municipal Section - Water Division  
Post Office Box 301463  
Montgomery, Alabama 36130-1463

Should you have any questions or comments concerning this letter, please feel free to contact **Draper Suttles** by email at [Draper.Rushing@adem.alabama.gov](mailto:Draper.Rushing@adem.alabama.gov) or by phone at **(334) 271-7812**

Sincerely,

Emily Anderson, Chief  
Municipal Section  
Industrial/Municipal Branch  
Water Division

**Birmingham Branch**  
110 Vulcan Road  
Birmingham, AL 35209-4702  
(205) 942-6168  
(205) 941-1603 (FAX)

**Decatur Branch**  
2715 Sandlin Road, S.W.  
Decatur, AL 35603-1333  
(256) 353-1713  
(256) 340-9359 (FAX)



**Mobile Branch**  
2204 Perimeter Road  
Mobile, AL 36615-1131  
(251) 450-3400  
(251) 479-2593 (FAX)

**Mobile-Coastal**  
3664 Dauphin Street, Suite B  
Mobile, AL 36608  
(251) 304-1176  
(251) 304-1189 (FAX)



**ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT (ADEM)**  
**NPDES INDIVIDUAL PERMIT APPLICATION**  
**SUPPLEMENTARY INFORMATION FOR PUBLICLY-OWNED TREATMENT WORKS (POTW), OTHER TREATMENT**  
**WORKS TREATING DOMESTIC SEWAGE (TWTDS), AND PUBLIC WATER SUPPLY TREATMENT PLANTS**

**Instructions:** This form should be used to submit the required supplementary information for an application for an NPDES individual permit for Publicly Owned Treatment Works (POTW) and other Treatment Works Treating Domestic Sewage (TWTDS). The completed application should be submitted to ADEM in duplicate. If insufficient space is available to address any item, please continue on an attached sheet of paper. Please mark "N/A" in the appropriate box when an item is not applicable to the applicant. Please type or print legibly in blue or black ink. Mail the completed application to:

ADEM-Water Division  
Municipal Section  
P O Box 301463  
Montgomery, AL 36130-1463

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JUL 14 2022  
MUNICIPAL SECTION

**PURPOSE OF THIS APPLICATION**

- ☐ Initial Permit Application for New Facility\*  
☐ Modification of Existing Permit  
☐ Revocation & Reissuance of Existing Permit

- ☐ Initial Permit Application for Existing Facility\*  
☒ Reissuance of Existing Permit

\* An application for participation in the ADEM's Electronic Environmental (E2) Reporting must be submitted to allow permittee to electronically submit reports as required.

**SECTION A – GENERAL INFORMATION**

1. Facility Name: Gadsden West River WWTP Facility County: Etowah

a. Operator Name: The Water Works and Sewer Board of the City of Gadsden, Alabama

b. Is the operator identified in A.1.a, the owner of the facility? ☒ Yes ☐ No

If No, provide the following information:

Operator Name: \_\_\_\_\_

Operator Address (Street or PO Box): \_\_\_\_\_

City: \_\_\_\_\_ Zip: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

Operator Status:

☐ Public-federal ☐ Public-state ☐ Public-other (please specify): \_\_\_\_\_

☐ Private ☐ Other (please specify): \_\_\_\_\_

Describe the operator's scope of responsibility for the facility:

c. Name of Permittee\* if different than Operator: \_\_\_\_\_

\*Permittee will be responsible for compliance with the conditions of the permit

2. NPDES Permit Number: AL 0053201 (Not applicable if initial permit application)

3. Facility Location (Front Gate): Latitude: 33d 59m 26s Longitude: -86d 02m 06s

4. Responsible Official (as described on last page of this application):

Name and Title: Chad Hare, General Manager

Address: P.O. Box 800

City: Gadsden State: Alabama Zip: 35902-0800

Phone Number: (256) 543-2884 (ext. 222) Email Address: chare@gadsdenwater.org

5. Designated Facility/DMR Contact:

Name: Mike Lankford Title: AGM/Superintendent of Environmental Services  
 Phone Number: (256) 543-2884 (ext. 223) Email Address: mlankford@gadsdenwater.org

6. Designated Emergency Contact:

Name: Mike Lankford Title: AGM/Superintendent of Environmental Services  
 Phone Number: (256) 543-2884 (ext. 223) Email Address: \_\_\_\_\_

7. Please complete this section if the Applicant's business entity is a Proprietorship or Limited Liability Company (LLC) with a responsible official not listed in A.4.

Name: \_\_\_\_\_ Title: \_\_\_\_\_  
 Address: \_\_\_\_\_  
 City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_  
 Phone Number: \_\_\_\_\_ Email Address: \_\_\_\_\_

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 AUG 09 2022  
 MUNICIPAL SECTION

8. Identify all Administrative Complaints, Notices of Violation, Directives, or Administrative Orders, Consent Decrees, or Litigation concerning water pollution or other permit violations, if any against the Applicant within the State of Alabama in the past five years (attach additional sheets if necessary):

Facility Name	Permit Number	Type of Action	Date of Action
Gadsden East River WWTP	AL0022659	Warning Letter	05/21/2019
Gadsden West River WWTP	AL0053201	Warning Letter	01/06/2020
Gadsden East/West River WWTP	AL0022659 (&)	AL0053201 - NOV/Intent to File Suit	11/18/2021
Gadsden East River WWTP	AL0022659	ADEM Complaint filed in the Circuit Court of	1/12/2022
Gadsden West River WWTP	AL0053201	Etowah County, Alabama	

**SECTION B – WASTEWATER DISCHARGE INFORMATION**

1. Attach a process flow schematic of the treatment process, including the size of each unit operation and sample collection locations.

2. Do you share an outfall with another facility? ☒ Yes ☐ No (If no, continue to B.3)

For each shared outfall, provide the following:

Applicant's Outfall No.	Name of Other Permittee/Facility	NPDES Permit No.	Where is sample collected by Applicant?
0011	City of Attalla Wastewater Treatment Lagoon	AL0057657	Prior to mixing, except for toxicity
_____	_____	_____	_____
_____	_____	_____	_____

3. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

**Current:** Flow Metering ☒ Yes ☐ No ☐ N/A  
 Sampling Equipment ☒ Yes ☐ No ☐ N/A  
**Planned:** Flow Metering ☐ Yes ☐ No ☒ N/A  
 Sampling Equipment ☐ Yes ☐ No ☒ N/A

If so, please attach a schematic diagram of the sewer system indicating the present or future location of this equipment and describe the equipment below:

Influent and Effluent Endress & Hauser MAG meter(s)  
 Sigma 9000 or ISCO automatic samplers for influent and effluent composite sampling



4. Are any wastewater collection or treatment modifications or expansions planned during the next three years that could alter wastewater volumes or characteristics (Note: Permit Modification may be required)? ☒ Yes ☐ No

If Yes, briefly describe these changes and any potential or anticipated effects on the wastewater quality and quantity: (Attach additional sheets if needed.)

Continuous collection system and manhole rehabilitation and maintenance to reduce inflow and infiltration, which could result in decreased flows.

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## SECTION C – WASTE STORAGE AND DISPOSAL INFORMATION

Describe the location of all sites used for the storage of solids or liquids that have any potential for accidental discharge to a water of the state, either directly or indirectly via storm sewer, municipal sewer, municipal wastewater treatment plants, or other collection or distribution systems that are located at or operated by the subject existing or proposed NPDES-permitted facility. Indicate the location of any potential release areas and provide a map or detailed narrative description of the areas of concern as an attachment to this application:

Description of Waste	Description of Storage Location
Sludge/Biosolids	Sand drying beds & dump trailer, with filtrate returned to head of plant
Aluminum Sulfate	Press building, with floor drains routed to head of plant

\*Indicate any wastes disposed at an off-site treatment facility and any wastes that are disposed on-site

## SECTION D – INDUSTRIAL INDIRECT DISCHARGE CONTRIBUTORS

1. List the existing and proposed industrial source wastewater contributions to the municipal wastewater treatment system (Attach other sheets if necessary)

Company Name	Description of Industrial Wastewater	Existing or Proposed	Flow (MGD)	Subject to SID Permit?
Tyson Foods	Food Cooking & Clean Up Chicken, Flour, Oil, Seasonings, Preservatives	Existing	350K - 450K gpd	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Cintas Corporation #746	Commercial Uniform Supplier/Laundrer Rental Uniforms, Dirty Uniforms, Detergents/Degrea	Existing	85,000 gpd	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Etowah Chemical Sales and Service	Chemical Mixing and Degreaser Manufacturing Acids, Bases, Phosphates, Detergents	Existing	1,000 gpd	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Choice Fabricators, Inc.	Metal Stamping, E-coating, Powder Coating Metal, Steel, Cutting Oils, Bases, Acids, Degreasers	Existing	12,000 gpd	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Prince Metal Stamping	Metal Stamping, E-coating, Powder Coating Metal, Steel, Cutting Oils, Bases, Acids, Degreasers	Existing	5,000 gpd	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
Techtrix, Inc.	Metal Stamping, E-coating, Powder Coating Metal, Steel, Cutting Oils, Bases, Acids, Degreasers	Existing	1,000 gpd	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No
				<input type="checkbox"/> Yes <input type="checkbox"/> No

2. Are industrial wastewater contributions regulated via a locally approved sewer use ordinance? ☒ Yes ☐ No

If yes, please attach a copy of the ordinance.



## SECTION E – COASTAL ZONE INFORMATION

Is the discharge(s) located within the 10-foot elevation contour and within the limits of Mobile or Baldwin County? ☐ Yes ☒ No  
If yes, complete items E.1 – E.12 below:

	Yes	No
1. Does the project require new construction? .....	<input type="checkbox"/>	<input type="checkbox"/>
2. Will the project be a source of new air emissions? .....	<input type="checkbox"/>	<input type="checkbox"/>
3. Does the project involve dredging and/or filling of a wetland area or water way? .....	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, has the Corps of Engineers (COE) permit been received? .....	<input type="checkbox"/>	<input type="checkbox"/>
COE Project No. ....		
4. Does the project involve wetlands and/or submersed grassbeds? .....	<input type="checkbox"/>	<input type="checkbox"/>
5. Are oyster reefs located near the project site? .....	<input type="checkbox"/>	<input type="checkbox"/>
If Yes, include a map showing project and discharge location with respect to oyster reefs		
6. Does the project involve the site development, construction and operation of an energy facility as defined in ADEM Admin. Code r. 335-8-1-.02(bb)? .....	<input type="checkbox"/>	<input type="checkbox"/>
7. Does the project involve mitigation of shoreline or coastal area erosion? .....	<input type="checkbox"/>	<input type="checkbox"/>
8. Does the project involve construction on beaches or dune areas? .....	<input type="checkbox"/>	<input type="checkbox"/>
9. Will the project interfere with public access to coastal waters? .....	<input type="checkbox"/>	<input type="checkbox"/>
10. Does the project lie within the 100-year floodplain? .....	<input type="checkbox"/>	<input type="checkbox"/>
11. Does the project involve the registration, sale, use, or application of pesticides? .....	<input type="checkbox"/>	<input type="checkbox"/>
12. Does the project propose or require construction of a new well or to alter an existing groundwater well to pump more than 50 gallons per day (GPD)? .....	<input type="checkbox"/>	<input type="checkbox"/>
If yes, has the applicable permit for groundwater recovery or for groundwater well installation been obtained? .....	<input type="checkbox"/>	<input type="checkbox"/>

## SECTION F – ANTI-DEGRADATION EVALUATION

In accordance with 40 CFR §131.12 and the ADEM Admin. Code r. 335-6-10-.04 for anti-degradation, the following information must be provided, if applicable. It is the applicant's responsibility to demonstrate the social and economic importance of the proposed activity. If further information is required to make this demonstration, attach additional sheets to the application.

1. Is this a new or increased discharge that began after April 3, 1991? ☐ Yes ☒ No  
If yes, complete F.2 below. If no, go to Section G.

2. Has an Anti-Degradation Analysis been previously conducted and submitted to the Department for the new or increased discharge referenced in F.1? ☐ Yes ☐ No

If yes, do not complete this section.

If no and the discharge is to a Tier II waterbody as defined in ADEM Admin. Code r. 335-6-10-.12(4), complete F.2.A – F.2.F below, ADEM Form 311-Alternatives Analysis, and either ADEM Form 312 or ADEM Form 313- Calculation of Total Annualized Project Costs (Public-Sector or Private-Sector Projects, whichever is applicable). ADEM Form 312 or ADEM Form 313, whichever is applicable, must be provided for each treatment discharge alternative considered technically viable. ADEM forms can be found on the Department's website at <http://adem.alabama.gov/DeptForms/>.

Information required for new or increased discharges to high quality waters:

- A. What environmental or public health problem will the discharger be correcting?

B. How much will the discharger be increasing employment (at its existing facility or as the result of locating a new facility)?

C. How much reduction in employment will the discharger be avoiding?

D. How much additional state or local taxes will the discharger be paying?

E. What public service to the community will the discharger be providing?

F. What economic or social benefit will the discharger be providing to the community?

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#### SECTION G – EPA Application Forms

All Applicants must submit certain EPA permit application forms. More than one application form may be required from a POTW or other TWTDS depending on the number and types of discharges or outfalls. The EPA application forms are found on the Department's website at <http://adem.alabama.gov/programs/water/waterforms.cnt>. The EPA application forms must be submitted in duplicate as follows:

1. Applicants for new or existing discharges of sanitary wastewater from Publicly-Owned Treatment Works (POTW) and Other Treatment Works Treating Domestic Sewage (TWTDS) must submit Form 2A. If the facility design capacity is equal to or greater than 1 MGD, Form 2F is also required.
2. Applicants for new or existing land application of sanitary wastewater must submit Form 2A and Form 2F.
3. Applicants for new and existing discharges of process wastewater from water treatment facilities (i.e. public water supply treatment plants) must submit Form 1 and Form 2C.
4. Applicants that generate sewage sludge, derive a material from sewage sludge, or dispose of sewage sludge must submit Part 2 of Form 2S.

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#### SECTION H– ENGINEERING REPORT/BMP PLAN REQUIREMENTS

See ADEM 335-6-6-.08(i) & (j).



**SECTION I- RECEIVING WATERS**

Outfall No.	Receiving Water(s)	303(d) Segment?		Included in TMDL?*	
001	Middle Coosa River	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No
		<input type="checkbox"/> Yes	<input type="checkbox"/> No	<input type="checkbox"/> Yes	<input type="checkbox"/> No

\*If a TMDL Compliance Schedule is requested, the following should be attached as supporting documentation:

- (1) Justification for the requested Compliance Schedule (e.g. time for design and installation of control equipment, etc.);
- (2) Monitoring results for the pollutant(s) of concern which have not previously been submitted to the Department (sample collection dates, analytical results (mass and concentration), methods utilized, MDL/ML, etc. should be submitted as available);
- (3) Requested interim limitations, if applicable;
- (4) Date of final compliance with the TMDL limitations; and,
- (5) Any other additional information available to support requested compliance schedule.

**SECTION J - APPLICATION CERTIFICATION**

The information contained in this form must be certified by a responsible official as defined in ADEM Administrative Code r. 335-6-6-.09 "signatories to permit applications and reports" (see below).

*"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine and imprisonment for knowing violations."*

Signature of Responsible Official: 

Date Signed: 7/12/2022

Name: Chad Hare Title: General Manager

If the Responsible Official signing this application is not identified in Section A.4 or A.7, provide the following information:

Mailing Address: P.O. Box 800

City: Gadsden State: Alabama Zip: 35902-0800

Phone Number: (256) 543-2884 (ext. 222) Email Address: chare@gadsdenwater.org

**335-6-6-.09 SIGNATORIES TO PERMIT APPLICATIONS AND REPORTS.**

- (1) The application for an NPDES permit shall be signed by a responsible official, as indicated below:
  - (a) In the case of a corporation, by a principal executive officer of at least the level of vice president, or a manager assigned or delegated in accordance with corporate procedures, with such delegation submitted in writing if required by the Department, who is responsible for manufacturing, production, or operating facilities and is authorized to make management decisions which govern the operation of the regulated facility;
  - (b) In the case of a partnership, by a general partner;
  - (c) In the case of a sole proprietorship, by the proprietor; or
  - (d) In the case of a municipal, state, federal, or other public entity, by either a principal executive officer, or ranking elected official.



## ARTICLE III. SEWERS

### Sec. 16-39. Definitions.

Unless the context specifically indicates otherwise, the meaning of terms used in this article shall be as follows:

*Abnormal strength sewerage:* Any waste having a suspended solid or BOD concentration in excess of that found in normal strength sewage, but which is otherwise acceptable into a public sewer under the terms of this article.

*Act or the act:* The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. 1251 et. seq.

*Agreement:* The Alabama Pretreatment Program Memorandum of Agreement between the Alabama Water Improvement Commission and the water board.

*Approval authority:* The director of the Alabama Department of Environmental Management.

*Authorized representative of industrial user:* May be: (1) A principal executive officer of at least the level of vice-president, if the industrial user is a corporation; (2) a general partner or proprietor if the industrial user is a partnership or proprietorship, respectively;

(3) a duly authorized representative of the individual designated above if such representative is responsible for the overall operation of the facilities from which the indirect discharge originates.

**ADEM-** The Alabama Department of Environmental Management, as successor agency to the Alabama Water Improvement **Commission**.

*BOD* (denoting biochemical oxygen demand): The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedure in five (6) days at twenty (20) degrees C., expressed in milligrams per liter.

*Building drain:* That part of the horizontal piping of a building drainage system which receives the discharge of all soils, waste and other drainage system from inside the walls of any building and conveys the same to the building service sewer five (5) feet outside the foundation wall of such building.

*Building service sewer:* That part of the horizontal piping of a building drainage system beginning five (5) feet from the foundation wall and terminating at its connection with the main sewer, cesspool, septic tank or other disposal terminal.

*Categorical standards:* The national categorical pretreatment standards, or pretreatment standard.

*COD* (denoting chemical oxygen demand): A measure of the oxygen consuming capacity of inorganic and organic matter present in wastewater. It is expressed as the amount of oxygen consumed from a chemical oxidant in a specific test.

*Collecting sewer:* A sewer that receives wastewater and discharges into a main sewer serving more than one collecting sewer.

*Common sewer:* A building service sewer or building drain that receives wastewater from more than one discharger before it empties into a collecting sewer.

*Compatible pollutant:* Biochemical oxygen demand (BOD), total suspended solids (TSS), pH, fecal coliform bacteria, ammonia and ammonia compounds, fats, oils and greases of animal or vegetable origin, except as prohibited herein or identified on the national pollutant discharge elimination system permit of the water board.





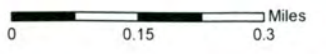
**B.2. Topographic Map  
West River WWTP  
Gadsden, AL**

 Gadsden Water Works  
"Quality on Tap"

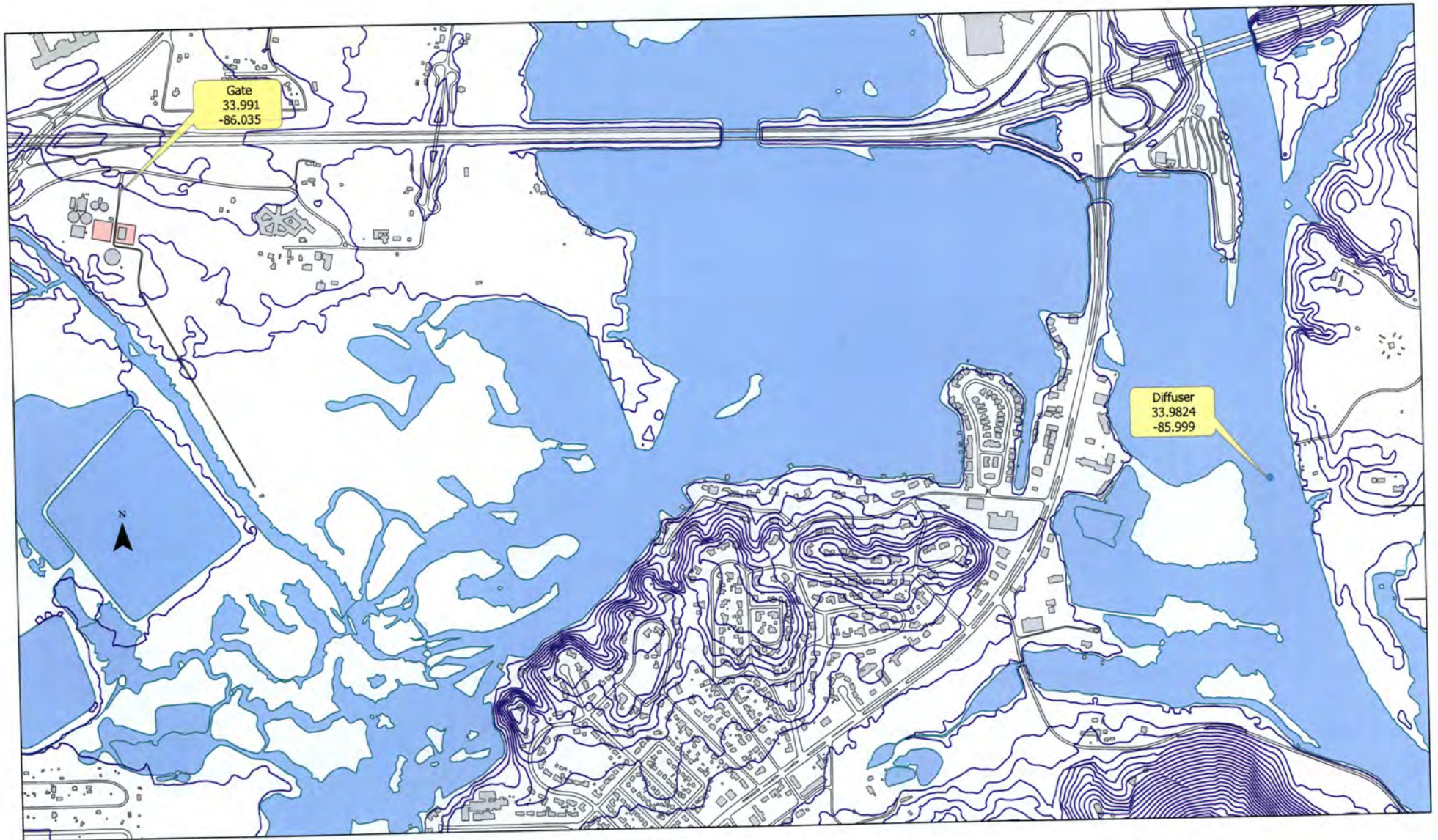
**Legend**

-  West WWTP 1 mi. Buffer
-  West WWTP Boundary
-  Sewer Manholes
-  Sewer Lines
-  Sewer Lift Station





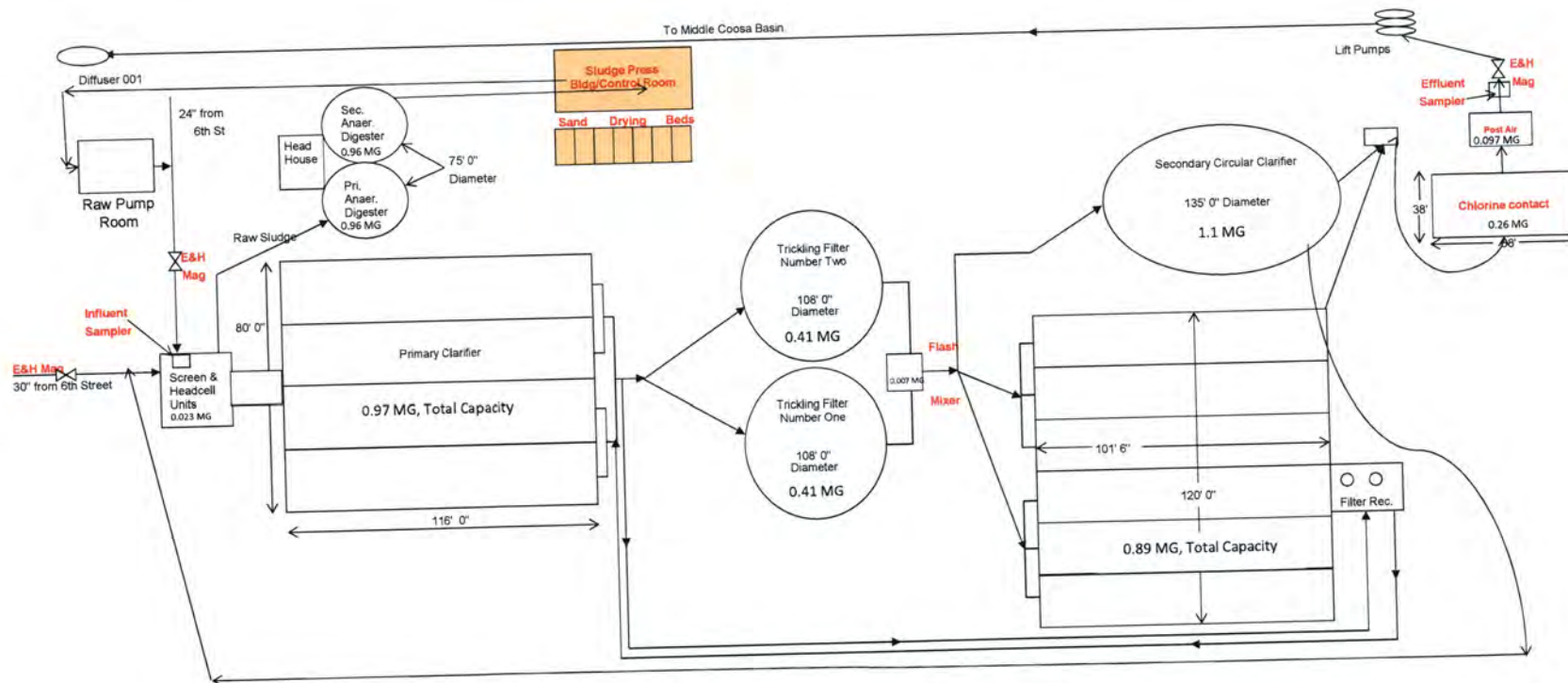




RECEIVED

FEB 17 2023

MUNICIPAL SECTION



# GADSDEN WEST RIVER WWTTP

AL0053201 - Average Daily Flow (this Permit Application) - 7.529 MGD

RECEIVED

FEB 17 2023

MUNICIPAL SECTION



## Simmons, Michael N

---

**From:** Mike Lankford <mlankford@gadsdenwater.org>  
**Sent:** Thursday, March 9, 2023 3:50 PM  
**To:** Simmons, Michael N  
**Subject:** Information  
**Attachments:** PFAS\_Results\_West\_River\_WWTP\_Apr-Jun\_2022.pdf;  
PFAS\_Results\_West\_River\_WWTP\_Jan-Mar\_2020.pdf

Mr. Simmons,

Please find attached updated/corrected PFAS results for Jan – Mar 2020 (the concentrations were reported in ug/L and not ng/L), and for Apr – Jun 2022 (the concentrations were correct. I don't know what happened on the masses; just a miscalculation). Also, on the 51624 during Apr – Jun 2021, the monthly average should be the same as the max (24 ppt). Sorry for the miscalculations.

As for the Gadsden West River WWTP design capacity, I don't know how that was originally calculated, nor do I know the method used to calculate plant design flow. What I do know is that the surface settling rate (SSR) should be 400 – 800 gal/ft<sup>2</sup> for secondary clarifiers. With our two (2) secondary clarifiers, we have a total surface area of 26,486 ft<sup>2</sup>. With a flow of 11,320,000 gallons/day, the SSR for the West Plant would be approximately 427 gal/ft<sup>2</sup>/day. Also the weir overflow rate for secondary clarifiers should be approximately 10,000 gallons/weir foot/day. With the two (2) secondary clarifiers, we have a total weir length of approximately 1,106 feet, which would make the plant's WOR at 11,320,000 gallon/day 10,235 gallons/ft/day.

Also, the secondary basin detention times – approximately 2,000,000 gallons of capacity – with a flow of 11,320,000 gallon/day, would be approximately 4 hours, with the typical secondary clarifier design detention time being around 3 hours.

If you know of a better way for this to be verified/calculated, please let me know. I like math and numbers and will be glad to calculate almost anything.

I will work on the two (2) forms and try to get that to you as quickly as possible.

Thanks.

Be Blessed,

*Mike Lankford*, Assistant General Manager/Superintendent of Environmental Services

The Water Works & Sewer Board of the City of Gadsden, AL

515 Albert Rains Blvd.

P. O. Box 800

Gadsden, AL. 35901

(W) (256) 543-2884 ext. 223

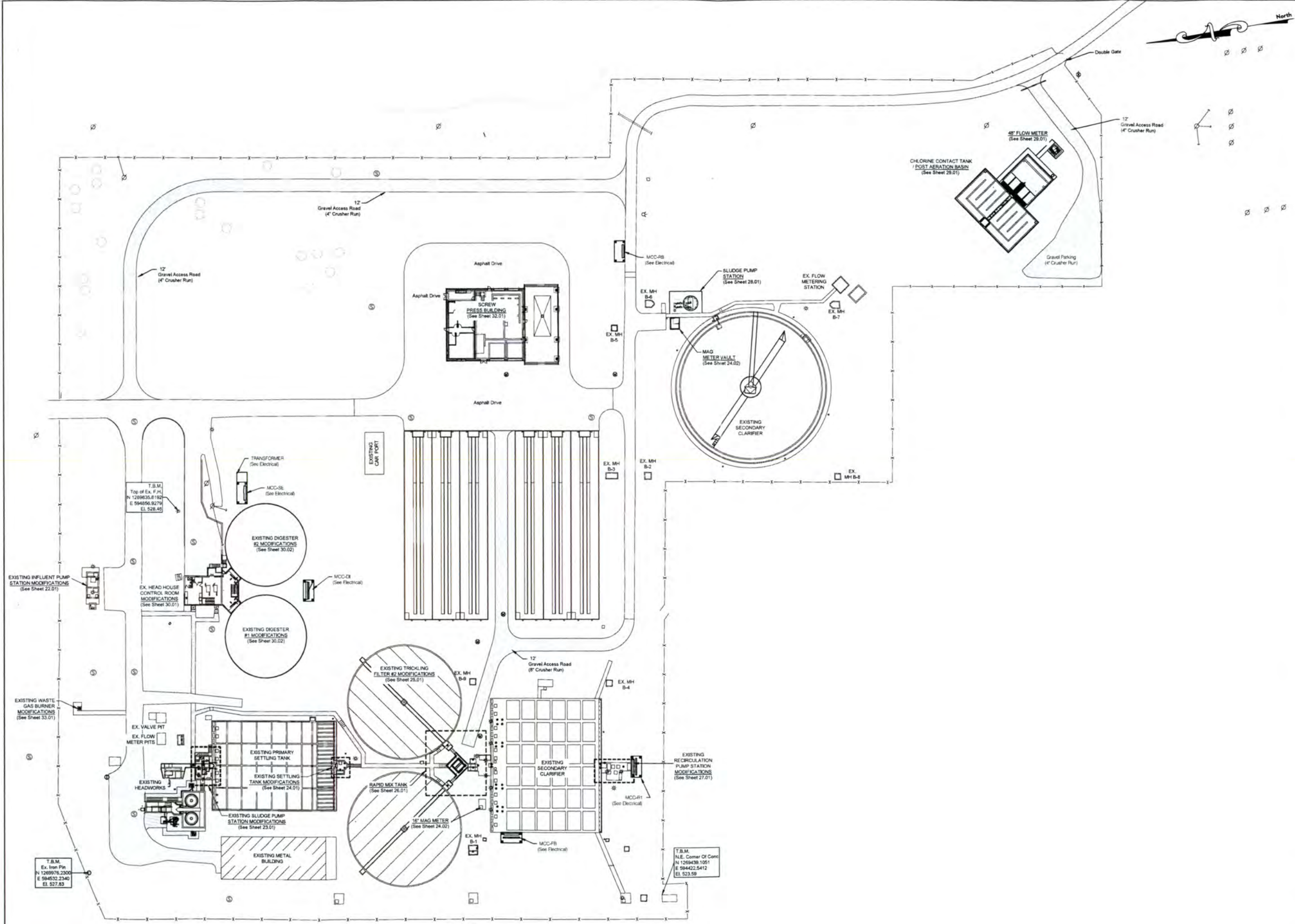
(F) (256) 543-7704

[www.gadsdenwater.org](http://www.gadsdenwater.org)



Virus-free [www.avg.com](http://www.avg.com)





WEST RIVER WWTP  
OVERALL SITE PLAN

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

18.01  
sheet 56 of 104

GMC Project Number- 5-10-046  
Scale- 1" = 40'-0"

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
Asbuilt	06.20.2014
Project Manager	
Engineer	BM/JWC
Designer	TR/JWC
Drawn by	KD/FN/MP

RECORD  
DRAWINGS

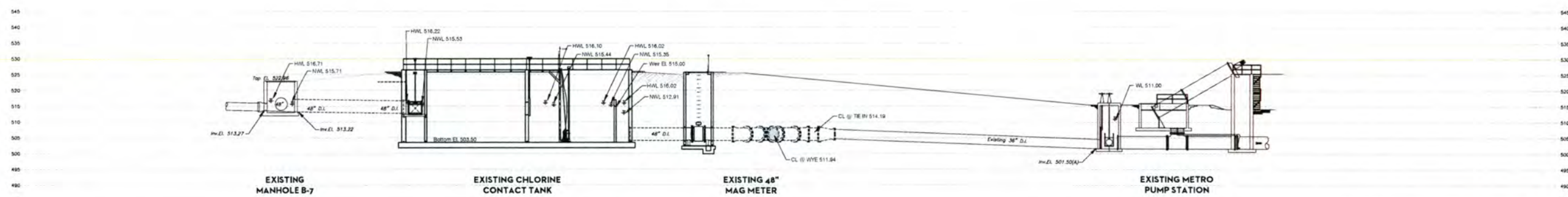
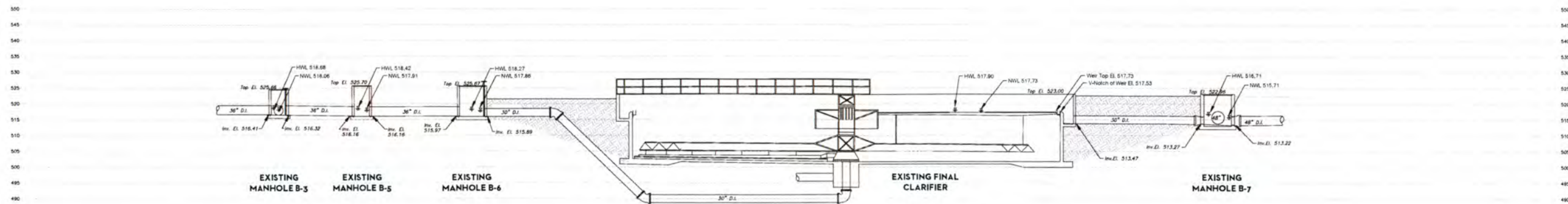
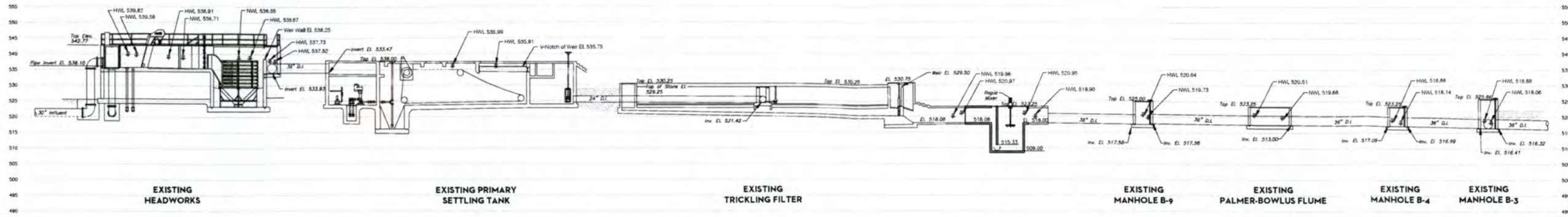
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AS FURNISHED BY THE  
CONTRACTOR



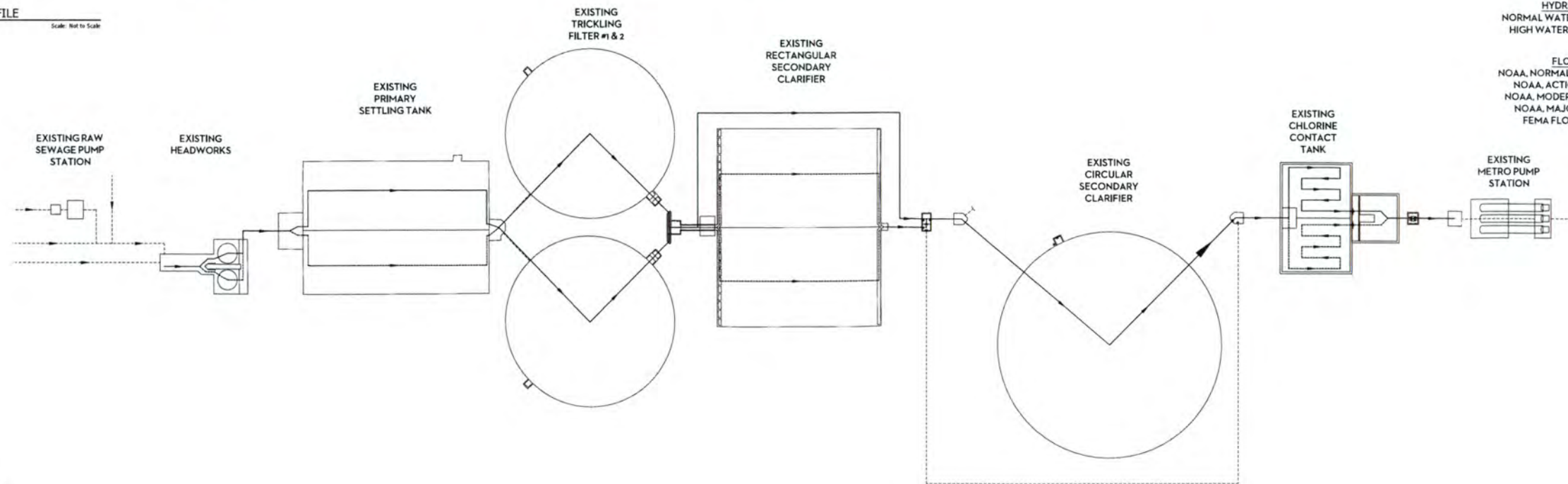
GOODWYN MILLS CAWOOD

2660 East Chase Lane, Suite 200 | Montgomery, AL 36117  
Tel 334-271-3200 | GMCNETWORK.COM





HYDRAULIC PROFILE  
Scale: Not to Scale



FLOW SCHEMATIC  
Scale: Not to Scale

HYDRAULIC SCENARIOS  
NORMAL WATER LEVEL,  $Q=11.3$  MGD (NWL)  
HIGH WATER LEVEL,  $Q=19.0$  MGD (HWL)

FLOOD SCENARIOS  
NOAA, NORMAL POOL LEVEL  $+508.00'$  -  $+511.00'$   
NOAA, ACTION FLOOD STAGE  $+511.00'$   
NOAA, MODERATE FLOOD STAGE  $+514.00'$   
NOAA, MAJOR FLOOD STAGE  $+517.00'$   
FEMA FLOOD ELEVATION  $+518.00'$

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046

Scale- 1"= 200'

WEST RIVER WWTP  
HYDRAULIC PROFILE  
& PIPING SCHEMATIC

19.01  
Sheet 58 of 104

RECORD  
DRAWINGS

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
As-built	06.20.2014

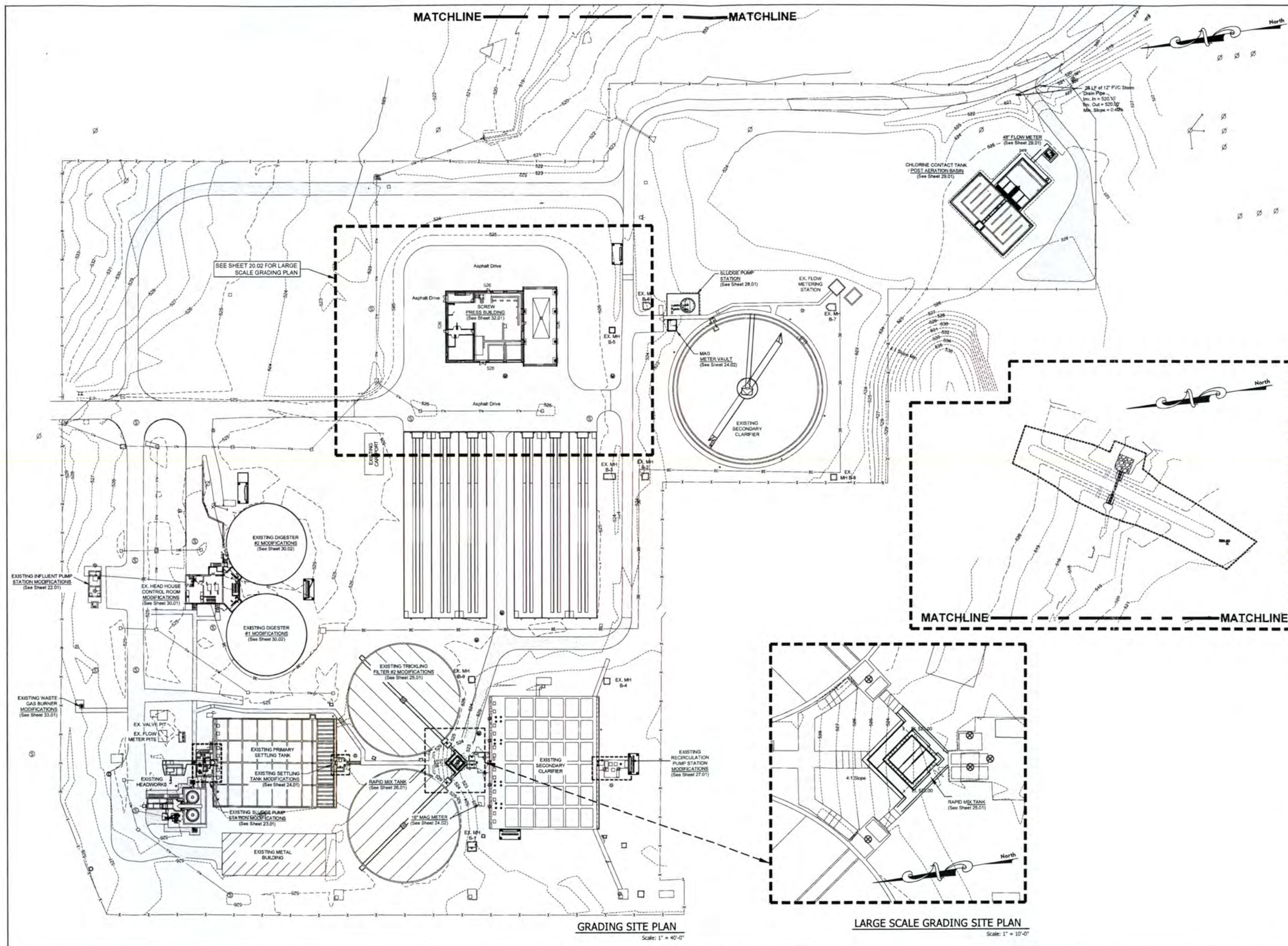
Project Manager	BM/JWC
Engineer	TR/JWC
Designer	TR
Drawn by	KD/FN/MP



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GRADING SITE PLAN  
Scale: 1" = 40'-0"

LARGE SCALE GRADING SITE PLAN  
Scale: 1" = 10'-0"

WEST RIVER WWTWP  
GRADING & DRAINAGE  
SITE PLAN

PHASE II EAST & WEST RIVER WWTWP IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

20.01  
sheet 59 of 104

GMC Project Number- 5-10-046  
Scale- As Noted

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
As-built	06.20.2014

Project Manager	BM/JWC
Engineer	TR/JWC
Designer	TR
Drawn by	KD/FN/MP

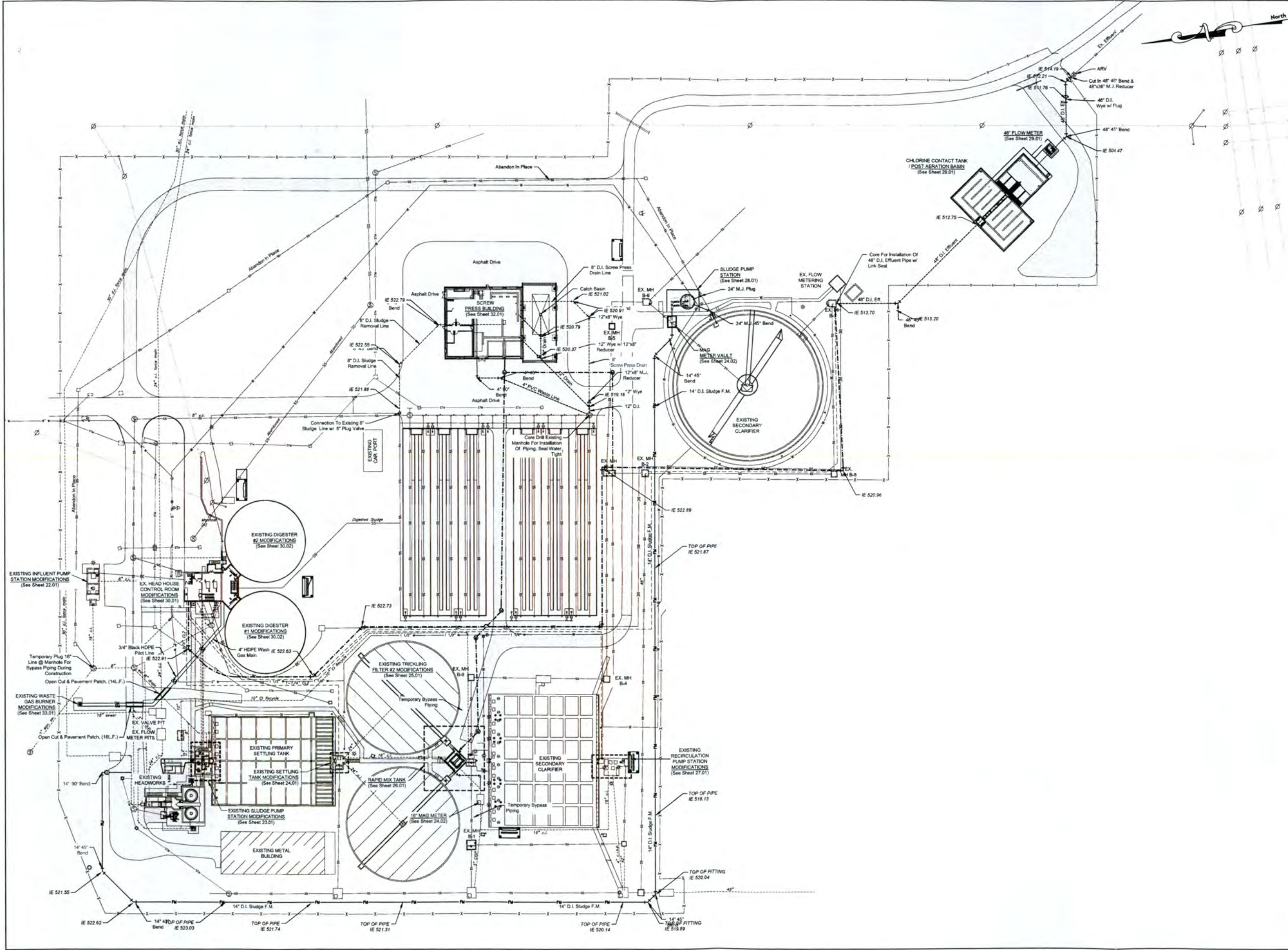
RECORD DRAWING  
AS BUILT RECORD DRAWING  
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WEST RIVER WWTP  
YARD PIPING  
SITE PLAN

21.01  
Sheet 62 of 104

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046  
Scale- 1" = 40'-0"

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
As-built	06.20.2014

Project Manager	BMJ/JWC
Engineer	TR/JWC
Designer	TR
Drawn by	KD/FN/MP

RECORD  
DRAWINGS

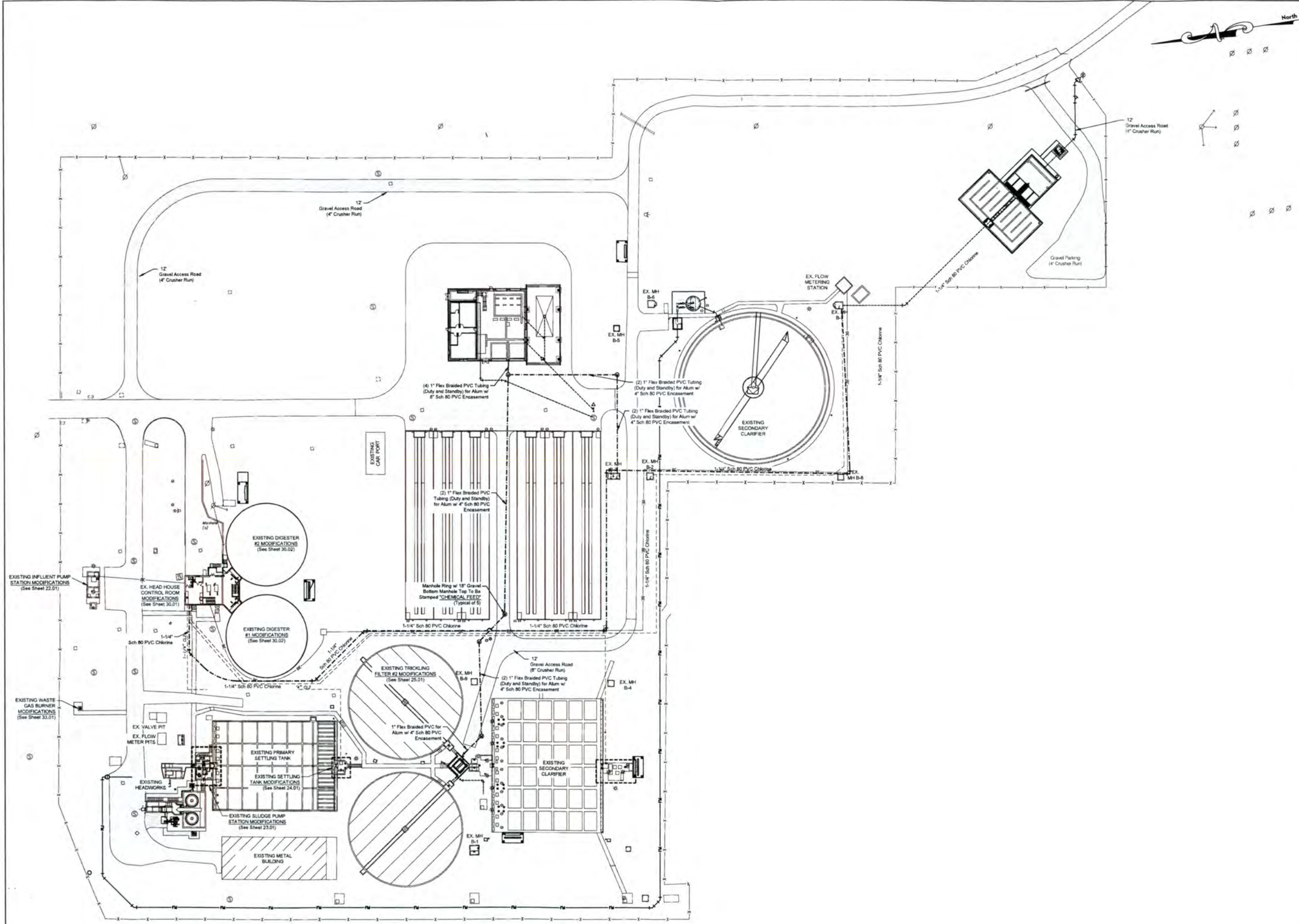
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WEST RIVER WWTP  
CHEMICAL FEED PIPING  
SITE PLAN

21.02  
sheet 63 of 104

PHASE II EAST & WEST RIVER WWTF IMPROVEMENTS  
FOR THE WATER WORKS & SEWER BOARD  
OF THE CITY OF GADSDEN, ALABAMA

GMC Project Number- 5-10-046  
Scale- 1" = 40'-0"

ISSUE DATE	
Final	07.20.2012
Revision	02.26.2013
Asbuilt	06.20.2014
Project Manager	
Engineer	BMJ/JWC
Designer	TR/JWC
Drawn by	KD/FN/MP

RECORD  
DRAWINGS

AS BUILT RECORD DRAWING  
AS SUBMITTED BY THE  
CONTRACTOR



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