

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

September 12, 2022

CERTIFIED MAIL 9489 0090 0027 6295 6643 67
RETURN RECEIPT REQUESTED

Norman McCrory
Water and Sewer Operations Manager
The Water Works and Sewer Board of the City of Prichard
125 East Clark Avenue
Prichard, AL 36610

RE: **Consent Order 22-121-CWP**
NPDES Permit: AL0023205
Carlos Morris WWTP
54 Grover Street, Prichard, AL
Mobile County (097)

NPDES Permit: AL0055204
Stanley Brooks WWTP
Aldock Road, Prichard, AL
Mobile County (097)

Dear Mr. McCrory:

Please find the enclosed ADEM Consent Order 22-121-CWP which requires you to take certain actions in regard to alleged violations of the Alabama Water Pollution Control Act. This Consent Order has been issued with the consent of The Water Works and Sewer Board of the City of Prichard. Please note that the assessed civil penalty is due within 45 days.

Sincerely,

A handwritten signature in blue ink that reads "Jeffery W. Kitchens".

Jeffery W. Kitchens, Chief
Water Division

JWK/gag

File: ECO/22-121-CWP

Enclosure

cc: Shawn Sibley/ADEM, Office of General Counsel
Carrie Blanton/ADEM, Office of General Counsel
Daphne Lutz/ADEM, Industrial/Municipal Branch
Emily Anderson/ADEM, Industrial/Municipal Branch
Stephanie Ammons/ADEM, Industrial/Municipal Branch

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
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Cade Kistler, Baykeeper
Mobile Baykeeper
450-C Government Street
Mobile, Alabama 36602

RE: Response to Comments on Draft Consent Order
Water Works and Sewer Board of the City of Prichard
Carlos Morris WWTP
NPDES Permit Number AL0023205
Stanley Brooks WWTP
NPDES Permit Number AL0055204

Dear Mr. Kistler:

The following is provided in response to your comments dated August 7, 2022 regarding the draft consent order for the Water Works and Sewer Board of the City of Prichard for the Carlos Morris WWTP and Stanley Brooks WWTP, NPDES Permit Numbers AL0023205 and AL0055204, respectively.

- Mobile Baykeeper expressed concerns regarding the penalty imposed by the consent order. In arriving at the civil penalty the Department has considered the following factors: seriousness of the violations, standard of care, economic benefit which delayed compliance may have conferred, efforts to minimize or mitigate the effects of the violations upon the environment, history of previous violations, and ability to pay. As indicated in the consent order, the Permittee has not alleged an inability to pay the civil penalty. Therefore, the civil penalty has not been modified.
- Mobile Baykeeper expressed concerns regarding the lack of a plan for how the Engineering Report will be funded and implemented. The consent order requires the Permittee to prepare and submit to the Department an Engineering Report that addresses the need for changes in maintenance and operating procedures, the potential for infiltration and inflow, the need for modification of existing treatment and collection system works, and the need for new or additional treatment and collection system works as necessary to achieve compliance with applicable rules and regulations as well as the terms and conditions of the Carlos Morris WWTP and Stanley Brooks WWTP permits. The consent order also requires that the Engineering Report be prepared by a professional engineer licensed to practice in the State of Alabama and include a Compliance Plan with a schedule for implementation of necessary corrective actions and cost of such necessary corrective actions, if known. As indicated in Permit conditions II.A.1 of both Permits, adequate funding is required for proper operation and maintenance, and it is the Permittee's responsibility to ensure adequate funding is available to implement the recommendations provided in the Engineering Report. Therefore, the Engineering Report requirements of the consent order have not been modified.

Thank you for your careful review of the draft consent order and the comments submitted. The Department intends to issue the consent order as proposed. Should you have any questions, please contact Stephanie Ammons at 334-274-4151.

Sincerely,

Emily D. Anderson
Municipal Section, Chief
Industrial/Municipal Branch
Water Division

Cc: Water Works and Sewer Board of the City of Prichard

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**ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

IN THE MATTER OF:)
)
Water Works and Sewer Board of the City)
of Prichard)
)
Carlos Morris WWTP)
NPDES PERMIT NO. AL0023205)
Prichard, Mobile County, Alabama)
)
Stanley Brooks WWTP)
NPDES PERMIT NO. AL0055204)
Prichard, Mobile County, Alabama)

Consent Order No. 22-121-CWP

PREAMBLE

This Special Order by Consent is made and entered into by the Alabama Department of Environmental Management ("the Department") and the Water Works and Sewer Board of the City of Prichard ("the Permittee") pursuant to the provisions of the Alabama Environmental Management Act, Ala. Code §§ 22-22A-1 to 22-22A-17, as amended, the Alabama Water Pollution Control Act ("AWPCA"), Ala. Code §§ 22-22-1 to 22-22-14, as amended, and the regulations promulgated pursuant thereto.

STIPULATIONS

1. The Department is a duly constituted department of the State of Alabama pursuant to Ala. Code §§ 22-22A-1 to 22-22A-17, as amended.
2. Pursuant to Ala. Code § 22-22A-4(n), as amended, 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 AWPCA.

Carlos Morris WWTP

3. The Permittee operates a wastewater treatment plant ("WWTP") known as the Carlos Morris WWTP, located at 54 Grover Street in Prichard, Mobile County, Alabama.

4. The Department reissued National Pollutant Discharge Elimination System ("NPDES") Permit No. AL0023205 ("the Carlos Morris WWTP Permit") to the Water Works and Sewer Board of the City of Prichard on March 7, 2005, effective April 1, 2005, establishing limitations on the discharge of pollutants from a point source, designated therein as Outfall 001, to Three Mile Creek, a water of the State. The Carlos Morris 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. In addition, the Carlos Morris WWTP Permit requires that the Permittee properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Permittee to achieve compliance with the conditions of the Carlos Morris WWTP Permit.

5. Permit Condition I.A. of the Carlos Morris WWTP Permit requires that discharges be limited and monitored as specified in the Carlos Morris WWTP Permit. For the monitoring periods listed in Attachment 1, the Permittee submitted DMRs to the Department indicating that the Permittee has discharged pollutants from Outfall 001 into Three Mile Creek, a water of the State, in violation of the Carlos Morris WWTP Permit limitations for Five Day Biochemical Oxygen Demand ("BOD5"), Total Ammonia as Nitrogen ("NH3-N"), Dissolved Oxygen ("DO"), Enterococci, Total Residual Chlorine ("TRC"), pH, Total Suspended Solids ("TSS"), BOD5 Percent Removal, and TSS Percent Removal.

6. Permit Condition I.D.1.b of the Carlos Morris WWTP Permit requires the Permittee to submit DMRs so that they are received by the Department no later than the 28th day of the month following the monitoring period. The DMRs for the monitoring periods listed in Attachment 2 were submitted late.

7. Permit Condition I.D.2.b of the Carlos Morris WWTP Permit requires that a noncompliance notification report (ADEM Form 421) be submitted to the Department should a discharge not comply with any limitation of the permit. Noncompliance notification reports are to be submitted to the Department with the next DMR after becoming aware of the noncompliance. Departmental records indicate that the noncompliance notification reports for the monitoring periods listed in Attachment 3 were submitted late.

8. Permit Condition I.C.4 requires specific information be recorded for each measurement or sample taken pursuant to the requirements of the permit. Permit Conditions I.C.5.a. and b. require the Permittee to retain records of all monitoring information, including all calibration and maintenance records for a period of three years. Permit Condition II.A.1 requires the Permittee to properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of the permit. Permit Condition I.D.1.c. requires that the results of all monitoring conducted using an approved analytical method for a limited substance identified in Provision I.A of the permit be included in the calculation and reporting of values on DMRs. The Department conducted a compliance evaluation inspection of the Carlos Morris WWTP on June 16, 2020. At the time of the inspection, the inspector noted that the sample result records were incomplete, the Permittee was unable to provide calibration records for the pH meter, the secondary clarifier baffle was damaged, drying beds were overgrown, sampler tubing appeared to have algae buildup, and records indicated that not all analyses performed more frequently than required were reported on the DMRs.

9. Permit Condition II.A.1 requires the Permittee to properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of the permit. The Department conducted a compliance sampling inspection of the Carlos Morris WWTP on November 5, 2020. At the time of the inspection, the inspector noted that the grit disposal was not in operation, and the secondary clarifier was not in operation.

10. Ala. Code § 22-22-9(i)(3), as amended, requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The Permittee reported unpermitted discharges in the form of Sanitary Sewer Overflows ("SSOs") to the Department. The reported SSOs are listed in Attachment 4.

11. Permit Condition I.D.2.d of the Carlos Morris WWTP Permit requires that the Permittee provide notification to the Director, the public, the county health department, and any other affected entity as soon as possible upon becoming aware of any notifiable SSO. The SSO reports for the dates listed in Attachment 4 indicate that the Department, the public, and the county health department were notified of the SSOs more than 24 hours after the SSOs began.

12. The Department issued a Notice of Violation to the Permittee on January 16, 2019, for Permit limitation violations including Enterococci, TSS, TSS Percent Removal, BOD5 Percent Removal, and Total Recoverable Zinc; SSOs; failure to provide notification of SSOs to the public and the county health department; failure to provide notification of SSOs to the Department, the public, and county health department in a timely manner; failure to submit complete SSO reports within five days of becoming aware of SSOs; and the findings of the July 19, 2018, compliance inspection.

13. The Department again issued a Notice of Violation to the Permittee on January 10, 2020, for Permit limitation violations including BOD5, NH3-N, and DO; failure to submit a noncompliance notification report; and submittal of an incomplete noncompliance notification report.

14. The Department again issued a Notice of Violation to the Permittee on November 23, 2020, for BOD5 Permit limitation violations, SSOs, and the findings of the August 7, 2019, and June 16, 2020, compliance inspections.

15. The Department received a response to the November 23, 2020, Notice of Violation on December 23, 2020, indicating that all issues noted in the August 7, 2019, and June 16, 2020, compliance inspections had been addressed, and the Permittee has been working diligently to mitigate SSOs in the system.

Stanley Brooks WWTP

16. The Permittee operates a wastewater treatment plant known as the Stanley Brooks WWTP, located at the end of Aldock Road, in Prichard, Mobile County, Alabama.

17. The Department reissued National Pollutant Discharge Elimination System ("NPDES") Permit No. AL0055204 ("the Stanley Brooks WWTP Permit") to the Water Works and Sewer Board of the City of Prichard on June 25, 2010, effective July 1, 2010, establishing limitations, terms, and conditions on the discharge of pollutants from a point source, designated therein as Outfall 001, to Chickasaw Creek, a water of the State. The Stanley Brooks WWTP Permit also establishes limitations, terms, and conditions on the discharge of storm water from point sources designated therein as Outfall 002, Outfall 003, and Outfall 004 into Eightmile Creek, a water of the State. The Department again reissued the Stanley Brooks WWTP Permit on May 26, 2020, effective

June 1, 2020. The Stanley Brooks WWTP Permit requires that the Permittee monitor its discharges and submit periodic DMRs to the Department describing the results of the monitoring. In addition, the Stanley Brooks WWTP Permit requires that the Permittee properly operate and maintain all facilities and systems of treatment and control which are installed or used by the Permittee to achieve compliance with the conditions of the Stanley Brooks WWTP Permit.

18. Permit Condition I.A. of the Stanley Brooks WWTP Permit requires that discharges be limited and monitored as specified in the Stanley Brooks WWTP Permit. For the monitoring periods listed in Attachment 5, the Permittee submitted DMRs to the Department indicating that the Permittee has discharged pollutants from Outfall 001 into Chickasaw Creek, a water of the State, in violation of the Stanley Brooks WWTP Permit limitations for Enterococci, TRC, TSS, Five Day Carbonaceous Biochemical Oxygen Demand ("CBOD5") Percent Removal, and TSS Percent Removal.

19. Permit Condition I.A. of the Stanley Brooks WWTP Permit requires that discharges be limited and monitored as specified in the Stanley Brooks WWTP Permit. The quarterly DMRs for the October 2020 through December 2020 monitoring period indicate that the Permittee failed to monitor for all storm water parameters at Outfall 002, Outfall 003, and Outfall 004.

20. Permit Condition I.C.1.b of the Stanley Brooks WWTP Permit requires the Permittee to submit DMRs so that they are received by the Department no later than the 28th day of the month following the monitoring period. The DMRs for the monitoring periods listed in Attachment 6 were submitted late.

21. Permit Condition I.C.2.b of the Stanley Brooks WWTP Permit requires that a noncompliance notification report (ADEM Form 421) be submitted to the Department should a discharge not comply with any limitation of the permit. Noncompliance notification reports are to be submitted to the Department with the next DMR after becoming aware of the noncompliance. Departmental records indicate that the noncompliance notification reports for the monitoring periods listed in Attachment 7 were submitted late.

22. Permit Condition I.B.4 requires specific information be recorded for each measurement or sample taken pursuant to the requirements of the permit. Permit Conditions I.B.5.a. and b.

require the Permittee to retain records of all monitoring information, including all calibration and maintenance records for a period of three years. Permit Condition II.A.1 requires the Permittee to properly operate and maintain all facilities and systems of treatment and control which are installed or used by the permittee to achieve compliance with the conditions of the permit. Permit Condition I.C.1.c.(4) requires that the results of all monitoring conducted using an approved analytical method for a limited substance identified in Provision I.A of the permit be included in the calculation and reporting of values on DMRs.

23. The Department conducted a compliance evaluation inspection of the Stanley Brooks WWTP on July 25, 2019. At the time of the inspection, the inspector noted that the grit pump was not in operation, trickling filter No. 2 (West) was experiencing a small amount of ponding, final clarifier No. 1 had water coming up under the weir in several places, the drying beds were full and overgrown with vegetation, and the facility appeared to be behind schedule in having dried sludge removed.

24. The Department conducted a compliance evaluation inspection of the Stanley Brooks WWTP on August 12, 2020. At the time of the inspection, the inspector noted the following violations: sample result records were incomplete; the Permittee was unable to provide calibration records for the pH meter; pH buffers expired in June 2020; the Permittee was unable to provide maintenance records; facility operator log books were incomplete; sprinkler heads on the trickling filter distributor arm appeared to be clogged with algae; the Permittee was unable to provide sampling records for phosphorous and copper for the June 2020 and July 2020 monitoring periods; influent and effluent sampler tubing appeared to have algae buildup; the Permittee was unable to provide maintenance and calibration records for influent and effluent samplers; the effluent sampler was set up to pull 150 ml per aliquot but only pulled approximately 80 ml per aliquot at the time of the inspection; and the Permittee was unable to provide storm water collection records for the first and second quarters of 2020.

25. The Department conducted a compliance sampling inspection of the Stanley Brooks WWTP on November 5, 2020. At the time of the inspection, the inspector noted that operation and maintenance manuals and schedules were not maintained.

26. Ala. Code § 22-22-9(i)(3), as amended, requires that a permit be obtained prior to discharging any new or increased pollution into any water of the State. The Permittee reported unpermitted discharges in the form of SSOs to the Department. The reported SSOs are listed in Attachment 8.

27. The Department issued a Warning Letter to the Permittee on December 1, 2020, for pH and CBOD5 permit limitation violations; late submittal of DMRs; SSOs; failure to include the receiving water body of SSOs on SSO reports; late submittal of a Municipal Water Pollution Plan ("MWPP"); and the findings of the July 25, 2019, and August 12, 2020, compliance inspections.

28. The Department received a response to the Warning Letter on December 30, 2020, indicating that all issues noted in the July 25, 2019, and August 12, 2020, compliance inspections had been addressed. The response also stated the Permittee reviewed its standard operating procedures to make sure DMRs are submitted on time, and that the Permittee has and will continue to conduct training for staff for SSO reporting.

29. The Permittee consents to abide by the terms of this Consent Order and to pay any civil penalty assessed herein.

30. The Department has agreed to the terms of this Consent Order in an effort to resolve the violations cited herein without the unwarranted expenditure of State resources in further prosecuting the alleged violations. The Department has determined that the terms contemplated in this Consent Order are in the best interests of the citizens of Alabama.

CONTENTIONS

Pursuant to Ala. Code § 22-22A-5(18)c., as amended, in determining the amount of any penalty, the Department must give consideration to the seriousness of the violation, including any irreparable harm to the environment and any threat to the health or safety of the public; the standard of care manifested by such person; the economic benefit which delayed compliance may confer upon such person; the nature, extent, and degree of success of such person's efforts to minimize or mitigate the effects of such violation upon the environment; such person's history of previous violations; and the ability of such person to pay such penalty. Any civil penalty assessed pursuant to this authority shall not exceed \$25,000.00 for each violation, provided

however, that the total penalty assessed in an order issued by the Department shall not exceed \$250,000.00. Each day that such violation continues shall constitute a separate violation. In arriving at this civil penalty (summarized in Attachment 9), the Department has considered the following:

A. **SERIOUSNESS OF THE VIOLATIONS AND BASE PENALTY:** Based on the information available to the Department, violations of the Permits, ADEM Admin. Code chap. 335-6-6, and the AWPCA were noted. The Department considered the general nature of each violation, the magnitude and duration of each non-compliant discharge, the characteristics of each pollutant discharged, the condition of the receiving waters, the violations' effects, if any, on the receiving waters, and any available evidence of irreparable harm to the environment or threat to the public.

B. **THE STANDARD OF CARE:** The Permittee could have easily avoided some of the violations cited herein by conducting required monitoring and recordkeeping; submitting timely DMRs; and performing easily implemented maintenance (e.g. cleaning or replacing sampling tubes). In consideration of the standard of care manifested by the Permittee, the Department enhanced the penalty.

C. **ECONOMIC BENEFIT WHICH DELAYED COMPLIANCE MAY HAVE CONFERRED:** The Department has considered that delayed compliance may have conferred an economic benefit upon the Permittee but is unable to estimate the economic benefit associated with the violations cited above, as the costs for compliance are not currently available.

D. **EFFORTS TO MINIMIZE OR MITIGATE THE EFFECTS OF THE VIOLATIONS UPON THE ENVIRONMENT:** The Department is unaware of any efforts by the Permittee to minimize or mitigate the effects of the violations upon the environment.

E. **HISTORY OF PREVIOUS VIOLATIONS:** As noted herein, the Permittee has a history of previous violations. In consideration of such history of previous violations, the Department has enhanced the penalty.

F. **THE ABILITY TO PAY:** The Permittee has not alleged an inability to pay the civil penalty.

G. This Special Order by Consent is a negotiated settlement and, therefore, the Department has compromised the amount of the penalty the Department believes is warranted

in this matter in the spirit of cooperation and desire to resolve this matter amicably, without incurring the unwarranted expense of litigation.

H. The civil penalty is summarized in Attachment 9.

ORDER

THEREFORE, the Permittee, along with the Department, desires to resolve and settle the compliance issues cited above. The Department has carefully considered the facts available to it and has considered the penalty factors enumerated in Ala. Code § 22-22A-5(18)c., as amended, as well as the need for timely and effective enforcement, and the Department believes that the penalty assessed below and the following conditions are appropriate to address the violations alleged herein. Therefore, the Department and the Permittee (collectively "Parties") agree to enter into this CONSENT ORDER with the following terms and conditions:

A. The Department assessed a total penalty in the amount of \$234,675.00 for this Consent Order. Except as allowed for in Paragraph B below, the Permittee shall pay to the Department a civil penalty in the amount of \$234,675.00 in settlement of the violations alleged herein within forty-five days from issuance of this Consent Order. If the Permittee elects to perform the Supplemental Environmental Project ("SEP") as detailed in Paragraph B below, the Permittee shall pay to the Department a penalty in the amount of \$78,225.00 within 45 forty-five days of issuance of this Consent Order. Failure to pay the civil penalty within forty-five days from issuance may result in the Department's filing a civil action in the Circuit Court of Montgomery County to recover the civil penalty. An additional payment of up to \$156,450.00 may be required if the SEP detailed in Paragraph B below is not completed.

B. The Permittee has elected to submit a plan to the Department to implement a SEP. The Permittee has preliminarily proposed to implement a SEP by repairing or replacing private lateral lines that connect to the sewer lines owned and operated by the Permittee. Further, the Permittee agrees to submit, so that it is received by the Department no later than thirty days after the effective date of this Consent Order, unless extended in writing by the Department, a report outlining the scope of work for the above-referenced SEP, as well as an implementation plan and schedule to the Department for review and acceptance. The Permittee shall prepare and submit detailed semi-annual Progress Reports to the Department describing the Permittee's progress

with the SEP, if approved. The Permittee shall submit the Progress Reports so that they are received by the Department no later than 60 days after receipt of the Department's acceptance of the SEP and continuing every 180 days thereafter until completion of the SEP. This SEP may, at the sole discretion of the Department, offset a portion of the penalty at a ratio of \$1 of penalty for every \$3 spent on the SEP, but in no event shall the penalty be offset below \$78,225.00. Documentation of all SEP expenses shall be submitted to the Department for review and concurrence in determining the amount of the penalty offset no later than thirty days after the accepted completion date of the SEP or the completion of the SEP, whichever is earlier. Any total SEP value exceeding \$469,350.00 shall be at the discretion of the Permittee. If the SEP is not acceptable to the Department, then the remainder of the total penalty referenced in Paragraph A above (\$156,450.00) shall be due within forty-five days of the Permittee's receipt of the Department's notification that the SEP is not acceptable.

C. All penalties due pursuant to this Consent Order shall be made payable to the Alabama Department of Environmental Management by certified or cashier's check and shall be remitted to:

Office of General Counsel
Alabama Department of Environmental Management
P.O. Box 301463
Montgomery, Alabama 36130-1463

D. SSO Response Plan

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

i. 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

ii. 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).

iii. 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:
<http://adem.alabama.gov/alEnviroRegLaws/files/Division6Vol1.pdf> and
http://gis.adem.alabama.gov/ADEM_Dash/use_class/index.html.

4. Identification of surface waterbodies within the collection system area which are not classified as Swimming as indicated in Paragraph D.a.iii.3 above, but are known locally as areas where swimming occurs or as areas that are heavily recreated.
- iv. 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.
 - v. 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
 - vi. 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)
 - a. 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
- vii. 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.
- viii. 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.
- b. SSO Response Plan Implementation

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

c. Department Review of the SSO Response Plan

- i. When requested by the Director or his designee, the Permittee shall make the SSO Response Plan available for review by the Department.
- ii. Upon review, the Director or his designee may notify the Permittee that the SSO Response Plan is deficient and require modification of the Plan.
- iii. 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.

d. SSO Response Plan Administrative Procedures

- i. 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.
- ii. 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.
- iii. 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.

- iv. The Permittee shall complete a review and evaluation of the SSO Response Plan. 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.

E. The Permittee shall prepare and submit to the Department an Engineering Report that addresses the need for changes in maintenance and operating procedures, the potential for infiltration and inflow, the need for modification of existing treatment and collection system works, and the need for new or additional treatment and collection system works as necessary to achieve compliance with applicable rules and regulations as well as the terms and conditions of the Carlos Morris WWTP Permit and Stanley Brooks WWTP Permit. The Engineering Report shall include a Compliance Plan with a schedule for implementation of necessary corrective actions and cost of such necessary corrective actions, if known. The Engineering Report shall include a plan for continued maintenance and assessment of the collection system to minimize future inflow and infiltration. The Engineering Report shall include a certification that the SSO Response Plan required by the Stanley Brooks WWTP Permit which was issued on May 26, 2020, and became effective on June 1, 2020, has been fully implemented. The Engineering Report shall be prepared by a professional engineer licensed to practice in the State of Alabama. The Engineering Report shall be submitted so that it is received by the Department no later than ninety days after issuance of this Consent Order. If the Department determines through its review of the submitted Engineering Report that the submittal is not sufficient, then the Permittee shall modify the Engineering Report. The Permittee shall submit modifications to the Engineering Report, if required, so that they are received by the Department no later than thirty days after Permittee's receipt of the Department's comments.

F. The Permittee shall complete implementation of the recommendations provided in the Engineering Report regarding the Carlos Morris WWTP and Stanley Brooks WWTP not later than September 30, 2025.

G. The Permittee shall complete implementation of the recommendations provided in the Engineering Report pertaining to the Carlos Morris WWTP and Stanley Brooks WWTP sewer collection systems and lift stations not later than September 30, 2027.

H. The Permittee shall prepare and submit detailed quarterly Progress Reports to the Department describing the Permittee's progress towards achieving compliance with the items presented in the Compliance Plan, including the cost of necessary corrective actions. The Progress Reports shall also include the Permittee's progress towards the development and implementation of the SSO Response Plan for the Carlos Morris WWTP as required by Paragraph D. The Permittee shall submit the Progress Reports so that they are received by the Department no later than one hundred eighty days after issuance of this Consent Order and continuing every ninety days thereafter that the Permittee's performance obligations under this Consent Order remain incomplete. In addition, no later than fourteen days following each due date herein, the Permittee shall submit to the Department a written notice of noncompliance, if applicable. Notices of noncompliance shall state the cause(s) of noncompliance, the corrective action taken, and shall describe the Permittee's ability to comply with any remaining requirements of this Consent Order.

I. The Permittee shall fully comply with the Carlos Morris WWTP Permit limitations for BOD5, NH3-N, DO, pH, Enterococci, TRC, TSS, BOD5 Percent Removal, and TSS Percent Removal by September 30, 2025.

J. The Permittee fully comply with the Stanley Brooks WWTP Permit limitations for Enterococci, TRC, TSS, CBOD5 Percent Removal, and TSS Percent Removal by September 30, 2025.

K. The Permittee shall comply with all other terms, conditions, and limitations of the Carlos Morris WWTP Permit immediately upon issuance of this Consent Order, including the timely submittal of DMRs, the timely submittal of noncompliance notification reports, and the timely notification to the Department, the public, and the county health department of notifiable SSOs.

L. The Permittee shall comply with all other terms, conditions, and limitations of the Stanley Brooks WWTP Permit immediately upon issuance of this Consent Order including the monitoring requirements of the permit, the timely submittal of DMRs, and the timely submittal of noncompliance notification reports.

M. The Permittee shall complete Inflow and Infiltration rehabilitation, repairs, and upgrades to the Carlos Morris WWTP sewer collection system and lift stations as necessary to minimize and mitigate SSOs not later than September 30, 2027.

N. The Permittee shall complete Inflow and Infiltration rehabilitation, repairs, and upgrades to the Stanley Brooks WWTP sewer collection system and lift stations as necessary to minimize and mitigate SSOs not later than September 30, 2027.

O. The Permittee shall submit a certification to the Department, signed by a professional engineer licensed to practice in the State of Alabama, indicating whether the Permittee is in compliance with all requirements of this Consent Order. The Permittee shall submit such certification so that it is received by the Department no later than October 30, 2027.

P. After issuance of this Consent Order, the Permittee shall pay stipulated penalties for each day it fails to meet any of the milestone dates or satisfy any of the requirements set forth in or established by Paragraphs E, H, and O contained herein. The stipulated civil penalties for failure to meet each milestone or any requirement date, except for *Force Majeure* acts as hereinafter defined, shall be as follows:

<u>Period of Noncompliance</u>	<u>Penalty per Day per Violation</u>
1st to 30th day	\$ 100.00
31st to 60th day	\$ 200.00
After 60 days	\$ 300.00

If the Permittee fails to meet any milestone or any assigned date ninety days after the required dates found in Paragraphs E, H, and O the Department reserves the right to file a new action against the Permittee.

Q. Cumulative stipulated penalties described in Paragraph P above shall under no circumstances exceed \$15,000.00. Once stipulated penalties of \$15,000.00 are due to the Department, or should violations continue to occur after the final compliance date specified in the accepted Compliance Plan, the Department reserves the right to issue additional orders or file suit against the Permittee in the Circuit Court of Montgomery County or other court of competent jurisdiction to enforce compliance with this Consent Order.

R. Payment of stipulated penalties are due for violations of milestone dates under this Consent Order not later than the 28th day of the month following the month a milestone date was not achieved. Notification to the Permittee by the Department of the assessment of any stipulated penalty is not required.

S. This Consent Order shall apply to and be binding upon both Parties, their directors, officers, and all persons or entities acting under or for them. Each signatory to this Consent Order certifies that he or she is fully authorized by the Party he or she represents to enter into the terms and conditions of this Consent Order, to execute the Consent Order on behalf of the Party represented, and to legally bind such Party.

T. Subject to the terms of these presents and subject to provisions otherwise provided by statute, this Consent Order is intended to operate as a full resolution of the violations which are cited in this Consent Order.

U. The Permittee is not relieved from any liability if it fails to comply with any provision of this Consent Order.

V. For purposes of this Consent Order only, the Department may properly bring an action to compel compliance with the terms and conditions contained herein in the Circuit Court of Montgomery County. In any action brought by the Department to compel compliance with the terms of this Agreement, the Permittee shall be limited to the defenses of *Force Majeure*, compliance with this Agreement and physical impossibility. A *Force Majeure* is defined as any event arising from causes that are not foreseeable and are beyond the reasonable control of the Permittee, including its contractors and consultants, which could not be overcome by due diligence (i.e., causes which could have been overcome or avoided by the exercise of due diligence will not be considered to have been beyond the reasonable control of the Permittee) and which delays or prevents performance by a date required by the Consent Order. Events such as unanticipated or increased costs of performance, changed economic circumstances, normal precipitation events, or failure to obtain federal, state, or local permits shall not constitute *Force Majeure*. Any request for a modification of a deadline shall be accompanied by the reasons (including documentation) for each extension and the proposed extension time. The Permittee shall submit this information so that it is received by the Department a minimum of ten working

days prior to the original anticipated completion date. If the Department, after review of the extension request, finds the work was delayed because of conditions beyond the control and without the fault of the Permittee, the Department may extend the time as justified by the circumstances. The Department may also grant any other additional time extension as justified by the circumstances, but it is not obligated to do so.

W. The sole purpose of this Consent Order is to resolve and dispose of all allegations and contentions stated herein concerning the factual circumstances referenced herein. Should additional facts and circumstances be discovered in the future concerning the Carlos Morris WWTP or Stanley Brooks WWTP which would constitute possible violations not addressed in this Consent Order, then such future violations may be addressed in other orders as may be issued by the Director, by litigation initiated by the Department, or by such other enforcement action as may be appropriate. The Permittee shall not object to such future orders, litigation, or enforcement action based on the issuance of this Consent Order if such future orders, litigation, or other enforcement action addresses new matters not raised in this Consent Order.

X. This Consent Order shall be considered final and effective immediately upon signature of all Parties. This Consent Order shall not be appealable, and the Permittee does hereby waive any hearing on the terms and conditions of same.

Y. This Consent Order shall not affect the Permittee's obligation to comply with any Federal, State, or local laws or regulations.

Z. Final approval and entry into this Consent Order are subject to the requirements that the Department provide notice of proposed orders to the public, and that the public have at least thirty days within which to comment on the proposed Consent Order.

AA. Should any provision of this Consent Order be declared by a court of competent jurisdiction or the Environmental Management Commission to be inconsistent with Federal or State law and therefore unenforceable, the remaining provisions hereof shall remain in full force and effect.

BB. Any modification of this Consent Order shall be agreed to in writing and signed by both Parties.

CC. Except as otherwise set forth herein, this Consent Order is not and shall not be interpreted to be a permit or modification of an existing permit under Federal, State, or local law, and shall not be construed to waive or relieve the Permittee of its obligations to comply in the future with any permit.

Executed in duplicate, with each part being an original.

**WATER WORKS AND SEWER BOARD
OF THE CITY OF PRICHARD**

**ALABAMA DEPARTMENT OF
ENVIRONMENTAL MANAGEMENT**

EXECUTED AND ISSUED:

By: <u>Russell Heidelberg</u>	By: <u>Marilyn Elliott</u>
Its: <u>Chairperson</u>	Its: <u>Deputy Director</u>
Date: <u>6/16/2022</u>	Date: <u>9-12-2022</u>

Attachment I
 Carlos Morris WWTP Permit Effluent Limitation Violations

<u>Monitoring Period</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Unit</u>	<u>Violation Type</u>
April 2021	0012	BOD5 % Removal	85.0	54	%	Monthly Average Minimum
April 2021	0012	TRC	0.05	1.10	mg/l	Maximum Daily
April 2021	0012	Enterococci	500	921.0	col/100mL	Maximum Daily
April 2021	0012	NH3-N	250	260.2	lbs/day	Weekly Average
April 2021	0012	TSS % Removal	85.0	38	%	Monthly Average Minimum
May 2021	0012	BOD5	500	746.5	lbs/day	Monthly Average
May 2021	0012	BOD5	750	1538.2	lbs/day	Weekly Average
May 2021	0012	BOD5 % Removal	85.0	54	%	Monthly Average Minimum
May 2021	0012	TRC	0.05	1.30	mg/l	Maximum Daily
May 2021	0012	Enterococci	500	2420.0	col/100mL	Maximum Daily
May 2021	0012	NH3-N	166	467.7	lbs/day	Monthly Average
May 2021	0012	NH3-N	250	841.8	lbs/day	Weekly Average
May 2021	0012	NH3-N	5.0	5.8	mg/l	Monthly Average
May 2021	0012	NH3-N	7.5	8.6	mg/l	Weekly Average
May 2021	0012	DO	5.0	4.4	mg/l	Minimum Daily
May 2021	0012	TSS % Removal	85.0	66	%	Monthly Average Minimum
May 2021	0012	TSS	1000	2585.1	lbs/day	Monthly Average
May 2021	0012	TSS	1501	6526.3	lbs/day	Weekly Average
June 2021	0012	BOD5	750	1645.2	lbs/day	Weekly Average
June 2021	0012	BOD5 % Removal	85.0	59	%	Monthly Average Minimum
June 2021	0012	Enterococci	500	851.5	col/100mL	Maximum Daily
June 2021	0012	NH3-N	166	263.2	lbs/day	Monthly Average
June 2021	0012	NH3-N	250	600.8	lbs/day	Weekly Average
June 2021	0012	NH3-N	5.0	5.3	mg/l	Monthly Average
June 2021	0012	NH3-N	7.5	8.8	mg/l	Weekly Average
June 2021	0012	DO	5.0	4.4	mg/l	Minimum Daily
June 2021	0012	TSS % Removal	85.0	54	%	Monthly Average Minimum
June 2021	0012	TSS	1000	1929.4	lbs/day	Monthly Average
June 2021	0012	TSS	1501	8411.2	lbs/day	Weekly Average
July 2021	0012	BOD5	500	556.5	lbs/day	Monthly Average
July 2021	0012	BOD5	750	1699.7	lbs/day	Weekly Average
July 2021	0012	BOD5 % Removal	85.0	57	%	Monthly Average Minimum
July 2021	0012	NH3-N	166	273.6	lbs/day	Monthly Average
July 2021	0012	NH3-N	250	651.5	lbs/day	Weekly Average
July 2021	0012	NH3-N	5.0	5.4	mg/l	Monthly Average
July 2021	0012	NH3-N	7.5	8.3	mg/l	Weekly Average
July 2021	0012	DO	5.0	4.7	mg/l	Minimum Daily
July 2021	0012	pH	6.0	4.7	S.U.	Minimum Daily
July 2021	0012	TSS % Removal	85.0	48	%	Monthly Average Minimum
July 2021	0012	TSS	1000	1133.3	lbs/day	Monthly Average
July 2021	0012	TSS	1501	3407.2	lbs/day	Weekly Average
August 2021*	0012	BOD5	22.5	40.1	mg/l	Weekly Average
August 2021*	0012	BOD5 % Removal	85.0	43	%	Monthly Average Minimum

Monitoring Period	Outfall	Parameter	Limit	Reported Value	Unit	Violation Type
August 2021	0012	NH3-N	5.0	8.4	mg/l	Monthly Average
August 2021	0012	NH3-N	7.5	11.9	mg/l	Weekly Average
August 2021	0012	DO	5.0	3.0	mg/l	Minimum Daily
August 2021*	0012	TSS % Removal	85.0	52	%	Monthly Average Minimum
August 2021*	0012	TSS	45.0	71.5	mg/l	Weekly Average
September 2021	0012	BOD5	500	528.3	lbs/day	Monthly Average
September 2021	0012	BOD5	750	1332.0	lbs/day	Weekly Average
September 2021	0012	BOD5 % Removal	85.0	38.0	%	Monthly Average Minimum
September 2021	0012	Enterococci	500	1617.0	col/100mL	Maximum Daily
September 2021	0012	NH3-N	166	184.8	lbs/day	Monthly Average
September 2021	0012	NH3-N	250	257.7	lbs/day	Weekly Average
September 2021	0012	DO	5.0	4.9	mg/l	Minimum Daily
September 2021	0012	TSS % Removal	85.0	36.0	%	Monthly Average Minimum
September 2021	0012	TSS	1000	7853.1	lbs/day	Monthly Average
September 2021	0012	TSS	1501	31166.1	lbs/day	Weekly Average
September 2021	0012	TSS	30.0	37.0	mg/l	Monthly Average
September 2021	0012	TSS	45.0	100.4	mg/l	Weekly Average
October 2021	0012	BOD5 % Removal	85.0	60.0	%	Monthly Average Minimum
October 2021	0012	Enterococci	500	2420	col/100mL	Maximum Daily
October 2021	0012	NH3-N	166	283.7	lbs/day	Monthly Average
October 2021	0012	NH3-N	5.0	6.3	mg/l	Monthly Average
October 2021	0012	NH3-N	250	495.7	lbs/day	Weekly Average
October 2021	0012	DO	5.0	4.7	mg/l	Minimum Daily
October 2021	0012	TSS % Removal	85.0	42.0	%	Monthly Average Minimum
October 2021	0012	TSS	1000	1185.6	lbs/day	Monthly Average
October 2021	0012	TSS	1501	2552.3	lbs/day	Weekly Average
November 2021	0012	BOD5 % Removal	85.0	79	%	Monthly Average Minimum
November 2021	0012	Enterococci	500	2420	col/100mL	Maximum Daily
November 2021	0012	NH3-N	5.0	6.8	mg/l	Monthly Average
November 2021	0012	TSS % Removal	85.0	53	%	Monthly Average Minimum
December 2021	0012	BOD5	750	812.4	lbs/day	Weekly Average
December 2021	0012	BOD5 % Removal	85.0	74	%	Monthly Average Minimum
December 2021	0012	NH3-N	166	297.7	lbs/day	Monthly Average
December 2021	0012	NH3-N	5.0	5.6	mg/l	Monthly Average
December 2021	0012	NH3-N	7.5	9.2	mg/l	Weekly Average
December 2021	0012	NH3-N	250	1101.4	lbs/day	Weekly Average
December 2021	0012	TSS % Removal	85.0	29	%	Monthly Average Minimum
December 2021	0012	TSS	1501	2252.9	lbs/day	Weekly Average

BOD5 = Five Day Biochemical Oxygen Demand
 TRC = Total Residual Chlorine
 NH3-N = Total Ammonia as Nitrogen
 TSS = Total Suspended Solids
 DO = Dissolved Oxygen

*Results are an average of 3 weeks instead of 4 weeks due to invalid samples as a result of power outage at the testing lab caused by Hurricane Ida.

Attachment 2
Carlos Morris WWTP Late DMRs

<u>Monitoring Period</u>	<u>Report Frequency</u>	<u>Outfall</u>	<u>Due Date</u>	<u>Received Date</u>	<u>Days Late</u>
May 2020	Monthly	0012	06/28/2020	06/29/2020	1
June 2021	Monthly	0012	07/28/2021	08/02/2021	5
August 2021	Monthly	0012	09/28/2021	09/29/2021	1

Attachment 3
Carlos Morris WWTP Late Noncompliance Notification Reports

<u>Monitoring Period</u>	<u>Outfall</u>	<u>Noncompliance Notification Report Due Date</u>	<u>Noncompliance Notification Report Received Date</u>	<u>Days Late</u>
November 2019	0012	12/28/2019	2/6/2020	40
December 2019	0012	1/28/2020	4/2/2020	65
January 2020	0012	2/28/2020	4/2/2020	34
April 2021	0012	5/28/2021	7/20/2021	53
May 2021	0012	6/28/2021	9/9/2021	73
June 2021	0012	7/28/2021	9/9/2021	43
July 2021	0012	8/28/2021	9/9/2021	12
August 2021	0012	9/28/2021	11/2/2021	35
September 2021	0012	10/28/2021	11/2/2021	5

Attachment 4
 Carlos Morris WWTP SSOs

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
2/5/2020 20:00	2/5/2020 21:30	200	211 Patricia Ave	Yes	Yes	Yes
2/16/2020 9:40	2/17/2020 1:30	10,000 < gallons <= 25,000	211 Patricia Ave	Yes	Yes	Yes
2/16/2020 9:40	2/16/2020 21:00	1,000 < gallons <= 10,000	2408 Whistler	Yes	Yes	Yes
2/16/2020 9:40	2/16/2020 21:00	1,000 < gallons <= 10,000	2615 Bessemer Ct	Yes	Yes	Yes
2/16/2020 10:00	2/16/2020 21:10	1,000 < gallons <= 10,000	823 College St	Yes	Yes	Yes
2/16/2020 10:05	2/16/2020 21:15	1,000 < gallons <= 10,000	705 Sample	Yes	Yes	Yes
2/16/2020 10:15	2/16/2020 21:20	1,000 < gallons <= 10,000	Prichard Ave / Newsome	Yes	Yes	Yes
2/16/2020 10:30	2/17/2020 1:40	10,000 < gallons <= 25,000	1206 Craft Hwy	Yes	Yes	Yes
4/13/2020 3:00	4/13/2020 6:30	1,000 < gallons <= 10,000	54 Grover Avenue	Yes	Yes	Yes
6/7/2020 23:15	6/9/2020 0:00	10,000 < gallons <= 25,000	211 Patricia Ave	Yes	Yes	Yes
6/7/2020 23:16	6/9/2020 0:00	1,000 < gallons <= 10,000	2615 Bessemer Ct	Yes	Yes	Yes
6/7/2020 23:25	6/9/2020 0:10	10,000 < gallons <= 25,000	823 College	Yes	Yes	Yes
6/7/2020 23:40	6/8/2020 22:44	1,000 < gallons <= 10,000	Prichard Ln/Newsome St	Yes	Yes	Yes
6/8/2020 0:10	6/9/2020 0:20	10,000 < gallons <= 25,000	Chin/Butts St	Yes	Yes	Yes
6/8/2020 0:20	6/9/2020 0:30	1,000 < gallons <= 10,000	1206 N. Craft Hwy	Yes	Yes	Yes
7/8/2020 9:00	7/9/2020 0:00	9000	211 Patricia ave	Yes	Yes	Yes
7/8/2020 21:00	7/9/2020 0:00	9000	2516 whistler st	Yes	Yes	Yes
7/8/2020 21:00	7/9/2020 0:00	4500	823 College St	Yes	Yes	Yes
7/8/2020 21:00	7/9/2020 0:00	13500	22 Butts St	Yes	Yes	Yes
7/30/2020 7:30	7/30/2020 11:30	1,000 < gallons <= 10,000	The intersection of Chinn St and Butt St	Yes	Yes	Yes
8/3/2020 8:05	8/3/2020 8:22	<=1,000 gallons	The Intersection of Chinn St and Butt St	Yes	Yes	Yes
9/16/2020 9:50	9/16/2020 12:00	<=1,000 gallons	2615 Bessemer Ct	Yes	Yes	Yes
9/16/2020 9:51	9/16/2020 13:37	1,000 < gallons <= 10,000	211 Patricia Ave	Yes	Yes	Yes
9/16/2020 9:52	9/16/2020 13:37	1,000 < gallons <= 10,000	2408 Whistler	Yes	Yes	Yes

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
9/16/2020 10:15	9/16/2020 16:00	1,000 < gallons <=10,000	1206 Craft Hwy	Yes	Yes	Yes
9/16/2020 10:25	9/16/2020 14:00	1,000 < gallons <=10,000	823 N. College	Yes	Yes	Yes
9/16/2020 10:35	9/16/2020 13:50	<=1,000 gallons	705 Sample	Yes	Yes	Yes
9/16/2020 10:45	9/16/2020 15:30	1,000 < gallons <=10,000	830 Strauss	Yes	Yes	Yes
9/16/2020 11:00	9/16/2020 20:00	1,000 < gallons <=10,000	851 Chin	Yes	Yes	Yes
10/29/2020 8:00	10/29/2020 20:00	1,000 < gallons <=10,000	1206 Craft Hwy	Yes	Yes	Yes
12/4/2020 12:46	12/4/2020 23:00	75,000 < gallons <=100,000	The Intersection of Chinn St and Butt St	Yes	Yes	Yes
12/15/2020 8:20	12/15/2020 12:11	50,000 < gallons <=75,000	The intersection of Chinn St and Butt st.	Yes	Yes	Yes
12/24/2020 10:00	12/24/2020 21:00	10,000 < gallons <= 25,000	Chinn and Butts	Yes	Yes	Yes
12/24/2020 10:00	12/24/2020 21:05	1,000 < gallons <=10,000	2612 Bessemer Street	Yes	Yes	Yes
12/24/2020 10:00	12/24/2020 21:10	10,000 < gallons <= 25,000	211 Patricia Avenue	Yes	Yes	Yes
1/1/2021 14:01	1/1/2021 15:01	1,000 < gallons <=10,000	Intersection Chinn and Butt	Yes	Yes	Yes
2/12/2021 12:30	2/13/2021 3:00	10,000 < gallons <= 25,000	Intersection of Chin St & Butts Street	Yes	Yes	Yes
3/2/2021 15:00	3/2/2021 23:00	1,000 < gallons <=10,000	2408 Whistler St	Yes	Yes	Yes
3/2/2021 15:10	3/2/2021 23:30	10,000 < gallons <= 25,000	211 Patricia Avenue	Yes	Yes	Yes
3/2/2021 16:00	3/2/2021 23:20	10,000 < gallons <= 25,000	823 College Street	Yes	Yes	Yes
3/2/2021 16:10	3/3/2021 23:30	50,000 < gallons <=75,000	Intersection of Chinn/Butts	Yes	Yes	Yes
3/2/2021 16:20	3/2/2021 23:10	1,000 < gallons <=10,000	Prichard Lane & Newsome Street	Yes	Yes	Yes
3/24/2021 12:40	3/26/2021 13:50	75,000 < gallons <=100,000	Intersection of Chinn Street and Butt Street	Yes	Yes	Yes
3/25/2021 7:55	3/25/2021 8:26	<=1,000 gallons	1104 First Avenue	Yes	Yes	Yes
4/10/2021 8:00	4/11/2021 5:10	25,000 < gallons <=50,000	211 Patricia Avenue	Yes	Yes	Yes
4/10/2021 8:15	4/11/2021 5:00	10,000 < gallons <= 25,000	1206 Craft Hwy	Yes	Yes	Yes
4/10/2021 8:31	4/11/2021 17:00	50,000 < gallons <=75,000	Intersection of Chinn St/ Butts	Yes	Yes	Yes
4/10/2021 8:40	4/11/2021 5:15	25,000 < gallons <=50,000	Prichard Ave/ Newsome	Yes	Yes	Yes
4/10/2021 8:49	4/11/2021 5:20	10,000 < gallons <= 25,000	705 Sample Street	Yes	Yes	Yes
4/10/2021 9:03	4/11/2021 5:25	25,000 < gallons <=50,000	823 College	Yes	Yes	Yes

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
4/15/2021 8:00	4/16/2021 7:30	50,000 < gallons <=75,000	211 Patricia Avenue	Yes	Yes	Yes
4/15/2021 8:05	4/16/2021 7:37	50,000 < gallons <=75,000	2615 Bessemer CT	Yes	Yes	Yes
4/15/2021 8:06	4/16/2021 8:00	25,000 < gallons <=50,000	2408 Whistler	Yes	Yes	Yes
4/15/2021 8:10	4/18/2021 7:10	75,000 < gallons <=100,000	1206 Craft Hwy	Yes	Yes	Yes
4/15/2021 8:18	4/18/2021 18:00	100,000 < gallons <=250,000	Chinn/ Butts	Yes	Yes	Yes
4/15/2021 8:20	4/16/2021 3:15	25,000 < gallons <=50,000	351 W Highland Ave	Yes	Yes	Yes
4/15/2021 8:25	4/16/2021 3:00	50,000 < gallons <=75,000	Patricia Ave/ Newsome	Yes	Yes	Yes
4/15/2021 8:30	4/16/2021 3:30	25,000 < gallons <=50,000	705 Sample	Yes	Yes	Yes
4/15/2021 8:35	4/16/2021 7:40	50,000 < gallons <=75,000	823 College St	Yes	Yes	Yes
4/15/2021 11:45	4/15/2021 12:15	<=1,000 gallons	3828 Dial Street	Yes	Yes	Yes
4/15/2021 16:00	4/16/2021 20:00	25,000 < gallons <=50,000	2008 Wolf Ridge Road	Yes	Yes	Yes
4/16/2021 10:00	4/16/2021 13:00	1,000 < gallons <=10,000	2615 Bessemer	Yes	Yes	Yes
4/16/2021 10:10	4/16/2021 13:10	1,000 < gallons <=10,000	2408 Whistler	Yes	Yes	Yes
4/16/2021 11:23	4/17/2021 18:00	50,000 < gallons <=75,000	823 College Street	Yes	Yes	Yes
4/19/2021 11:00	4/19/2021 14:55	<=1,000 gallons	Intersection of Chinn/ Butts	Yes	Yes	Yes
4/19/2021 11:29	4/19/2021 13:45	<=1,000 gallons	317 E Elm Street	Yes	Yes	Yes
4/24/2021 8:22	4/25/2021 9:44	1,000 < gallons <=10,000	211 Patricia Avenue	No; 4/26/2021	No; 4/26/2021	Yes
4/24/2021 9:05	4/25/2021 9:50	1,000 < gallons <=10,000	830 Strauss Avenue	No; 4/26/2021	No; 4/26/2021	Yes
4/24/2021 9:08	4/25/2021 9:55	1,000 < gallons <=10,000	823 College St	No; 4/26/2021	No; 4/26/2021	Yes
4/24/2021 9:09	4/25/2021 9:57	1,000 < gallons <=10,000	705 Sample Street	No; 4/26/2021	No; 4/26/2021	Yes
4/24/2021 9:12	4/25/2021 10:00	1,000 < gallons <=10,000	Prichard Avenue /Newsome Avenue	No; 4/26/2021	No; 4/26/2021	Yes
4/24/2021 9:17	4/26/2021 8:00	10,000 < gallons <= 25,000	Chinn/ Butts Ave	No; 4/26/2021	No; 4/26/2021	Yes
5/11/2021 16:15	5/11/2021 20:00	1,000 < gallons <=10,000	2615 Bessemer Ct	Yes	Yes	Yes
5/11/2021 16:15	5/11/2021 20:00	25,000 < gallons <=50,000	211 Patricia Avenue	Yes	Yes	Yes
5/11/2021 16:17	5/11/2021 20:00	1,000 < gallons <=10,000	2408 Whistler Street	Yes	Yes	Yes
5/11/2021 16:26	5/11/2021 20:00	25,000 < gallons <=50,000	823 College St	Yes	Yes	Yes

Attachments

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
5/11/2021 16:33	5/11/2021 20:00	10,000 < gallons <= 25,000	830 Strauss Avenue	Yes	Yes	Yes
5/12/2021 8:02	5/13/2021 8:56	100,000 < gallons <=250,000	1206 Craft Hwy	Yes	Yes	Yes
5/12/2021 8:07	5/12/2021 9:22	1,000 < gallons <=10,000	351 W Highland Drive	Yes	Yes	Yes
5/12/2021 8:12	5/13/2021 9:25	250,000 < gallons <=500,000	823 College	Yes	Yes	Yes
5/12/2021 8:13	5/13/2021 9:25	100,000 < gallons <=250,000	705 Sample	Yes	Yes	Yes
5/12/2021 8:13	5/12/2021 17:10	25,000 < gallons <=50,000	Prichard Avenue/Newsome	Yes	Yes	Yes
5/12/2021 8:20	5/13/2021 9:15	250,000 < gallons <=500,000	211 Patricia	Yes	Yes	Yes
5/12/2021 8:20	5/13/2021 9:15	100,000 < gallons <=250,000	2408 Whistler	Yes	Yes	Yes
5/12/2021 9:11	5/13/2021 17:10	250,000 < gallons <=500,000	Chin/ Butts St	Yes	Yes	Yes
6/21/2021 11:05	6/23/2021 8:53	100,000 < gallons <=250,000	1205 Prichard Ave	No; 6/23/2021	Yes	Yes
6/21/2021 11:06	6/23/2021 8:49	100,000 < gallons <=250,000	705 Sample St	No; 6/23/2021	Yes	Yes
6/21/2021 11:08	6/23/2021 8:56	100,000 < gallons <=250,000		No; 6/23/2021	Yes	Yes
6/21/2021 11:13	6/23/2021 8:49	100,000 < gallons <=250,000	830 Strauss Ave	No; 6/23/2021	Yes	Yes
6/21/2021 13:01	6/23/2021 9:03	50,000 < gallons <=75,000	1203 N Martin Luther King Jr Drive	No; 6/23/2021	Yes	Yes
6/21/2021 16:06	6/23/2021 8:07	100,000 < gallons <=250,000	2156 Whistler St	No; 6/23/2021	Yes	Yes
6/21/2021 16:08	6/23/2021 8:55	50,000 < gallons <=75,000	2408 Whistler St	No; 6/23/2021	Yes	Yes
6/21/2021 16:10	6/23/2021 8:43	100,000 < gallons <=250,000	The Intersection of Patricia Ave and Whistler St.	No; 6/23/2021	Yes	Yes
6/22/2021 15:46	6/25/2021 8:10	500,000 < gallons <=750,000	The Intersection of Chinn St and Butt St.	No; 6/25/2021	Yes	Yes
6/23/2021 9:16	6/23/2021 10:45	2250	753 West highland street	Yes	Yes	Yes
6/23/2021 17:30	6/24/2021 9:36	100,000 < gallons <=250,000	1205 W Prichard Ave	Yes	Yes	Yes
6/23/2021 17:35	6/25/2021 8:53	75,000 < gallons <=100,000	705 Sample St	No; 6/25/2021	Yes	Yes
6/23/2021 17:40	6/25/2021 8:50	100,000 < gallons <=250,000	821 n College st	No; 6/25/2021	Yes	Yes
6/23/2021 17:50	6/24/2021 0:00	50,000 < gallons <=75,000	830 Strauss	Yes	Yes	Yes
6/23/2021 17:55	6/24/2021 9:14	50,000 < gallons <=75,000	1203 Dr MLK Jr Drive	Yes	Yes	Yes
6/23/2021 18:00	6/25/2021 8:30	100,000 < gallons <=250,000	The intersection of Whistler St and Bessemer Ct	No; 6/25/2021	Yes	Yes
6/23/2021 18:05	6/25/2021 8:30	250,000 < gallons <=500,000	The intersection of Whistler St and Patricia St	No; 6/25/2021	Yes	Yes

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
6/23/2021 18:10	6/24/2021 9:25	75,000 < gallons <= 100,000	2408 Whistler St	Yes	Yes	Yes
7/6/2021 14:00	7/6/2021 20:19	10,000 < gallons <= 25,000	1206 W Prichard Ave	No; 7/9/2021	Yes	Yes
7/6/2021 14:05	7/6/2021 20:20	1,000 < gallons <= 10,000	821 N College	No; 7/9/2021	Yes	Yes
7/6/2021 14:07	7/6/2021 20:15	25,000 < gallons <= 50,000	705 Sample St.	No; 7/9/2021	Yes	Yes
7/6/2021 15:25	7/7/2021 8:00	100,000 < gallons <= 250,000	854 Chinn St	No; 7/9/2021	Yes	Yes
7/19/2021 16:30	7/20/2021 6:10	25,000 < gallons <= 50,000	1205 W Prichard Ave	Yes	Yes	Yes
7/19/2021 16:32	7/20/2021 6:42	25,000 < gallons <= 50,000	821 N College St	Yes	Yes	Yes
7/19/2021 16:35	7/20/2021 6:45	10,000 < gallons <= 25,000	705 Sample St	Yes	Yes	Yes
7/19/2021 16:40	7/20/2021 6:30	100,000 < gallons <= 250,000	The intersection of Patricia St and Whistler St.	Yes	Yes	Yes
7/19/2021 16:46	7/20/2021 6:47	50,000 < gallons <= 75,000	2408 Whistler St	Yes	Yes	Yes
7/19/2021 20:30	7/20/2021 6:50	100,000 < gallons <= 250,000	The intersection of Chinn St and Butt St.	Yes	Yes	Yes
7/20/2021 10:21	7/20/2021 17:19	10,000 < gallons <= 25,000	1203 N. Dr Martin L. King Jr Dr	Yes	Yes	Yes
7/20/2021 10:25	7/20/2021 22:01	100,000 < gallons <= 250,000	The intersection of Patricia St and Whistler St	Yes	Yes	Yes
7/20/2021 10:25	7/20/2021 17:15	25,000 < gallons <= 50,000	The intersection of N Bessemer Ct and Whistler St	Yes	Yes	Yes
7/20/2021 11:05	7/20/2021 22:10	50,000 < gallons <= 75,000	1205 N Prichard Ave	Yes	Yes	Yes
7/20/2021 11:05	7/20/2021 17:20	50,000 < gallons <= 75,000	705 Sample St	Yes	Yes	Yes
7/20/2021 11:10	7/20/2021 22:19	50,000 < gallons <= 75,000	821 N College St	Yes	Yes	Yes
8/23/2021 10:00	8/23/2021 20:35	1,000 < gallons <= 10,000	1203 N Martin Luther King Jr Drive	Yes	Yes	Yes
8/29/2021 17:50	9/1/2021 10:02	500,000 < gallons <= 750,000	The Intersection of Patricia Ave and Whistler St	No; 8/31/2021	No; 8/31/2021	Yes
8/29/2021 18:06	9/2/2021 16:00	750,000 < gallons <= 1,000,000	The Intersection of Chinn St and Butt St	No; 8/31/2021	No; 8/31/2021	Yes
8/29/2021 18:11	9/1/2021 10:20	250,000 < gallons <= 500,000	1203 n Dr Martin Luther King Jr Drive	No; 8/31/2021	No; 8/31/2021	Yes
8/30/2021 0:05	9/1/2021 10:12	500,000 < gallons <= 750,000	1206 w Prichard Ave	No; 8/31/2021	Yes	Yes
8/30/2021 0:07	9/1/2021 10:10	500,000 < gallons <= 750,000	824 N College st	No; 8/31/2021	Yes	Yes
8/30/2021 0:10	9/1/2021 10:00	100,000 < gallons <= 250,000	705 Sample St	No; 8/31/2021	Yes	Yes
8/30/2021 0:18	9/1/2021 10:03	250,000 < gallons <= 500,000	2408 whistler st	No; 8/31/2021	Yes	Yes
8/30/2021 0:19	9/1/2021 10:01	500,000 < gallons <= 750,000	The Intersection of Bessemer Ct and Whistler St	No; 8/31/2021	Yes	Yes

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
8/31/2021 9:05	9/1/2021 10:28	75,000 < gallons <=100,000	361 W highland Dr	Yes	Yes	Yes
8/31/2021 9:15	9/1/2021 10:28	50,000 < gallons <=75,000	The Intersection of Wilcraft St and Dr Martin Luther King Jr. Drive.	Yes	Yes	Yes
8/31/2021 10:10	9/1/2021 10:30	250,000 < gallons <=500,000	830 Strauss Ave	Yes	Yes	Yes
8/31/2021 11:23	8/31/2021 18:00	<=1,000 gallons	1704 W Main St	Yes	Yes	Yes
9/15/2021 9:42	9/18/2021 14:00	750,000 < gallons <=1,000,000	The intersection of N. Bessemer Ct and Whistler St	Yes	Yes	Yes
9/15/2021 9:43	9/18/2021 14:00	750,000 < gallons <=1,000,000	The intersection of Patricia Ave and Whistler St.	Yes	Yes	Yes
9/15/2021 9:44	9/18/2021 14:00	100,000 < gallons <=250,000	2408 Whistler St	Yes	Yes	Yes
9/15/2021 9:52	9/18/2021 14:00	250,000 < gallons <=500,000	The Intersection of Wood St and North Dr Martin Luther King Jr Dr.	Yes	Yes	Yes
9/15/2021 10:05	9/20/2021 14:00	1296000	The intersection of Chinn St and Butt St.	Yes	Yes	Yes
9/15/2021 10:15	9/18/2021 14:00	500,000 < gallons <=750,000	The intersection of Newsome St and Prichard Ave.	Yes	Yes	Yes
9/15/2021 10:20	9/15/2021 14:00	500,000 < gallons <=750,000	705 Sample St	Yes	Yes	Yes
9/15/2021 10:25	9/18/2021 14:00	750,000 < gallons <=1,000,000	821 N College St	Yes	Yes	Yes
9/15/2021 10:32	9/15/2021 14:00	250,000 < gallons <=500,000	830 Strauss Ave	Yes	Yes	Yes
9/15/2021 15:51	9/18/2021 6:00	500,000 < gallons <=750,000	Across from 1907 First Ave.	Yes	Yes	Yes
10/27/2021 22:46	10/28/2021 3:00	25,000 < gallons <=50,000	The intersection of Chin St and Butt St	Yes	Yes	Yes
10/27/2021 23:50	10/28/2021 3:00	1,000 < gallons <=10,000	The intersection of Patricia Ave and Whistler st	Yes	Yes	Yes
10/27/2021 23:53	10/28/2021 3:05	1,000 < gallons <=10,000	1203 Dr Martin Luther King Jr Drive	Yes	Yes	Yes
10/27/2021 23:59	10/28/2021 3:05	1,000 < gallons <=10,000	The intersection of N Bessemer Ct and Whistler St(on the side of Prichard stadium)	Yes	Yes	Yes
10/28/2021 14:05	10/28/2021 16:26	25,000 < gallons <=50,000	The intersection of Velma St and W. Highland Ave	Yes	Yes	Yes
12/9/2021 22:07	12/10/2021 24:00	100,000 < gallons <= 250,000	1201 N Dr Martin L King Dr	Yes	Yes	Yes
12/9/2021 9:19 P	12/10/2021 10:00 A	10,000 < gallons <= 25,000	2401 Whistler St	Yes	Yes	Yes
12/9/2021 9:18 P	12/10/2021 10:00 A	100,000 < gallons <= 250,000	Intersection of Whistler St and Patricia Ave	Yes	Yes	Yes
12/9/2021 9:20 P	12/10/2021 10:00 A	100,000 < gallons <= 250,000	Intersection of North Bessemer Ct and Whistler St	Yes	Yes	Yes
12/9/2021 9:40 P	12/13/2021 8:00 A	750,000 < gallons <= 1,000	Intersection of Chinn St and Butt St	Yes	Yes	Yes
12/9/2021 10:00 P	12/10/2021 7:40 A	100,000 < gallons <= 250,000	1704 Prichard Ave	Yes	Yes	Yes

SSO Began	SSO Stopped	SSO Volume (gallons)	SSO Location	24 Hour Notification to ADEM?	24 Hour Notification to HD?	24 Hour Notification to the Public?
12/9/2021 9:55 P	12/10/2021 10:00 A	50,000 < gallons <= 75,000	701 Sample St	Yes	Yes	Yes
12/9/2021 9:59 A	12/10/2021 7:46 A	100,000 < gallons <= 250,000	854 N College St	No, 12/10/2021 3:45 PM	Yes	Yes
12/18/2021 8:19 A	12/18/2021 10:00 A	1,000 < gallons <= 10,000	Intersection of N Bessemer Ct and Whistler St	Yes	Yes	Yes
12/18/2021 8:46 A	12/19/2021 11:05 A	25,000 < gallons <= 50,000	865 N College St	Yes	Yes	No, 12/20/2021
12/18/2021 8:29 A	12/20/2021 9:00 A	100,000 < gallons <= 250,000	1208 N Dr Martin Luther King Dr	Yes	Yes	Yes
12/18/2021 8:25 A	12/19/2021 10:41 A	10,000 < gallons <= 25,000	2801 Whistler St	Yes	Yes	No, 12/20/2021
12/18/2021 8:53 A	12/19/2021 11:00 A	10,000 < gallons <= 25,000	204 Strauss St	Yes	Yes	No, 12/20/2021
12/18/2021 8:21 A	12/19/2021 10:41 A	25,000 < gallons <= 50,000	Intersection of Patricia Ave and Whistler	Yes	Yes	No, 12/20/2021
12/18/2021 8:35 A	12/20/2021 9:00 A	500,000 < gallons <= 750,000	Intersection of Chinn St and Butt St	Yes	Yes	No, 12/20/2021
1/20/2022 8:20 A	1/20/2022 12:15 P	12000 gallons	1201 N Martin Luther King Jr Dr	Yes	Yes	Yes
1/20/2022 8:30 A	1/20/2022 9:45 P	100,000 < gallons <= 250,000	Intersection of Chinn and Butt St	Yes	Yes	Yes
1/24/2022 8:30 A	1/24/2022 3:30 P	10,000 < gallons <= 25,000	Wood St and Dr. Martin Luther King Jr Dr	No, 1/25/2021 3:39 PM	Yes	Yes
1/25/2022 8:30 A	1/25/2022 10:00 A	2250 gallons	Intersection of S Bessemer Ct and W Main St	Yes	Yes	Yes

HD = Health Department

Attachment 5
 Stanley Brooks WWTP Permit Effluent Limitation Violations

<u>Monitoring Period</u>	<u>Outfall</u>	<u>Parameter</u>	<u>Limit</u>	<u>Reported Value</u>	<u>Unit</u>	<u>Violation Type</u>
April 2021	0011	TRC	0.08	2.0	mg/l	Maximum Daily
April 2021	0011	TRC	0.108	1.5	mg/l	Monthly Average
April 2021	0011	TSS % Removal	85.0	71.9	%	Monthly Average Minimum
May 2021	0011	TRC	0.08	1.6	mg/l	Maximum Daily
May 2021	0011	TRC	0.108	1.4	mg/l	Monthly Average
May 2021	0011	TSS % Removal	85.0	70.9	%	Monthly Average Minimum
May 2021	0011	TSS	562	665.9	lbs/day	Weekly Average
June 2021	0011	CBOD5 % Removal	85.0	83	%	Monthly Average Minimum
June 2021	0011	TRC	0.08	0.30	mg/l	Maximum Daily
June 2021	0011	TRC	0.108	0.14	mg/l	Monthly Average
June 2021	0011	Enterococci	158	2420.0	col/100mL	Maximum Daily
June 2021	0011	Enterococci	35	396.4	col/100mL	Monthly Average
June 2021	0011	TSS % Removal	85.0	77.6	%	Monthly Average Minimum
July 2021	0011	CBOD5 % Removal	85.0	82.3	%	Monthly Average Minimum
July 2021	0011	TRC	0.08	0.4	mg/l	Maximum Daily
July 2021	0011	TRC	0.108	0.2	mg/l	Monthly Average
July 2021	0011	Enterococci	35	79.8	col/100mL	Monthly Average
July 2021	0011	TSS % Removal	85.0	65.1	%	Monthly Average Minimum
August 2021	0011	TRC	0.08	0.2	mg/l	Maximum Daily
September 2021	0011	CBOD5 % Removal	85.0	84.3	%	Monthly Average Minimum
September 2021	0011	TRC	0.08	0.30	mg/l	Maximum Daily
September 2021	0011	Enterococci	35	42.7	col/100mL	Monthly Average
September 2021	0011	TSS % Removal	85.0	65.3	%	Monthly Average Minimum
December 2021	0011	CBOD5 % Removal	85.0	73	%	Monthly Average Minimum
December 2021	0011	TSS % Removal	85.0	67	%	Monthly Average Minimum

CBOD5 = Five Day Carbonaceous Biochemical Oxygen Demand
 TRC = Total Residual Chlorine
 TSS = Total Suspended Solids

Attachment 6
Stanley Brooks WWTP Late DMRs

<u>Monitoring Period</u>	<u>Report Frequency</u>	<u>Outfall</u>	<u>Due Date</u>	<u>Received Date</u>	<u>Days Late</u>
October 2020 - December 2020	Quarterly	002S	01/28/2021	03/11/2021	42
October 2020 - December 2020	Quarterly	003S	01/28/2021	03/11/2021	42
October 2020 - December 2020	Quarterly	004S	01/28/2021	03/11/2021	42
April 2021 - June 2021	Quarterly	002S	07/28/2021	08/17/2021	20
April 2021 - June 2021	Quarterly	003S	07/28/2021	08/17/2021	20
April 2021 - June 2021	Quarterly	004S	07/28/2021	08/17/2021	20

Attachment 7
Stanley Brooks WWTP Late Noncompliance Notification Reports

<u>Monitoring Period</u>	<u>Outfall</u>	<u>Noncompliance Notification Report Due Date</u>	<u>Noncompliance Notification Report Received Date</u>	<u>Days Late</u>
January 2020	0011	2/28/2020	7/15/2020	138
April 2021	0011	5/28/2021	9/3/2021	98
May 2021	0011	6/28/2021	9/3/2021	67
June 2021	0011	7/28/2021	9/3/2021	37
July 2021	0011	8/28/2021	9/9/2021	12
August 2021	0011	9/28/2021	11/2/2021	35
September 2021	0011	10/28/2021	11/2/2021	5

Attachment 8
 Stanley Brooks WWTP SSOs

<u>SSO Begin Date/Time</u>	<u>SSO Stop Date/Time</u>	<u>SSO Location</u>	<u>SSO Volume (gallons)</u>
3/3/2020 8:30	3/3/2020 8:50	1101 Aldock Rd	200
7/27/2020 14:22	7/27/2020 16:25	1620 Noble	1400
8/3/2020 10:56	8/3/2020 14:00	394 Aldock Road	1,000 < gallons <=10,000
9/16/2020 11:20	9/16/2020 12:20	4412 Winchester	<=1,000 gallons
10/10/2020 16:00	10/10/2020 16:30	4412 Winchester	350
11/9/2020 13:19	11/9/2020 14:00	2330 Old Citronelle Rd	<=1,000 gallons
11/13/2020 12:15	11/13/2020 12:25	4118 old Citronelle hwy	<=1,000 gallons
11/30/2020 12:30	11/30/2020 12:50	4412 Old Citronelle Hwy	1,000 < gallons <=10,000
1/31/2021 19:00	1/31/2021 21:30	across from 4320 Forest Park Drive	<=1,000 gallons
4/26/2021 11:00	4/26/2021 11:18	Intersection of Martha/ Old Citronelle Hwy	<=1,000 gallons
5/3/2021 10:30	5/3/2021 11:10	Intersection of Marsha Avenue & Old Citronelle Hwy	<=1,000 gallons
6/15/2021 11:05	6/15/2021 11:15	Intersection of Martha Ave & Old Citronelle Hwy	200
1/18/2022 9:30	1/18/2022 10:00	Intersection of Superior Dr. and W Myers Rd	1,000 < gallons <= 10,000

Attachment 9

Water Works and Sewer Board of the City of Prichard
 Carlos Morris WWTP - NPDES Permit No. AL0023205
 Stanley Brooks WWTP - NPDES Permit No. AL0055204
 Prichard, Mobile, Alabama

Violation*	Number of Violations*	(A)	(B)	(C)
		Seriousness of Violation*	Standard of Care*	History of Previous Violations*
Effluent Permit Limitation Violations	106	\$ 18,400.00	\$ -	\$ 5,300.00
Sanitary Sewer Overflows	171	\$ 202,350.00	\$ -	\$ 7,200.00
Sampling/Record Keeping Violations Noted During Inspection	3	\$ 300.00	\$ 150.00	\$ -
Operation and Maintenance Violations Noted During Inspection	3	\$ 300.00	\$ 150.00	\$ -
Failure to Monitor Stanley Brooks WWTP Stormwater	1	\$ 250.00	\$ 125.00	
Submittal of Stanley Brooks WWTP DMR >30 Days Late	1	\$ 100.00	\$ 50.00	\$ -

\$221,700.00	\$475.00	\$12,500.00
Total (A)	Total (B)	Total (C)

Additional Adjustments due to negotiations, receipt of additional information, or public comment

Mitigating Factors (-)	
Economic Benefit (+)	
Ability to Pay (-)	
Other Factors (+/-)	
Total Adjustments (+/-)	\$0.00

Base Penalty Total [Total (A) + Total (B) + Total (C)]	\$234,675.00
Mitigating Factors (-)	
Economic Benefit (+)	
Ability to Pay (-)	
Other Factors (+/-)	
INITIAL PENALTY	\$234,675.00
Total Adjustments (+/-)	\$0.00
FINAL PENALTY	\$234,675.00

Footnotes

*See the "Stipulations" portion of the Order for a detailed description of each violation and the penalty factors