Jacobs

Technical Memorandum 1: Flow and Loading

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Client:	Prichard Water Works and Sewer Board
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1. Introduction

Prichard's water and sewer system is owned and operated by the Prichard Water Works and Sewer Board (PWWSB), which is currently under the oversight of a court-appointed Receiver. As a part of the appointment, the Receiver is evaluating the long-term viability of the system. One option being considered is consolidation of the PWWSB wastewater treatment plants (WWTPs) with Mobile Area Water and Sewer System (MAWSS).

The purpose of this report is to evaluate existing wastewater flows and loadings for PWWSB's Stanley Brooks WWTP (Brooks WWTP) and Carlos Morris WWTP (Morris WWTP) as well as MAWSS' Wright Smith Jr. WWTP (Smith WWTP) and to develop a basis of design representing the consolidated flows and loadings from the three facilities for treatment at the Smith WWTP. This basis of design will support subsequent hydraulic and process capacity evaluations of the Smith WWTP, along with the planning and conceptual design of associated conveyance and wet-weather management infrastructure, including stormwater attenuation tanks and pump stations serving the Brooks WWTP and Morris WWTP service areas. This report also documents the data available at the time of the assessment and the assumptions made in developing the consolidated flow and loading projections and associated basis of design.

2. Wastewater Hydraulic Flow Historical Projection

Existing discharge monitoring report (DMR) data for Smith, Morris, and Brooks WWTPs were collected and evaluated for a 5-year period between January 2021 and January 2026. These reports were downloaded from the Alabama Department of Environmental Management's (ADEM's) online database and supplemented with data as reported by PWWSB operation staff. For this evaluation, future flow increases due to population growth, industrial growth, or other contributing factors were not considered, as they are assumed to be offset by the continued reduction in inflow and infiltration (I/I) within the PWWSB sewer collection system. The following sections summarize the results of the data assessments and establishes average daily flow (ADF), maximum daily flow (MDF), and peak hour flow (PHF) using engineering judgment based on available data for the three WWTPs considered.

2.1.1 PWWSB Stanley Brooks WWTP

This section describes the methods used in estimating the influent flow at the Stanley Brooks WWTP.

2.1.1.1 Lift Station Capacities Conveying to Stanley Brook WWTP

The Brooks WWTP largely serves the PWWSB service area west of Interstate 65 and has a monthly average design flow rate of 1.5 million gallons per day (MGD). PWWSB is required to report monthly average and daily maximum flows under its permit; however, the permit does not include a specific flow limitation. Instead, permit compliance is governed by the loadings received by the facility, which are influenced by the volume of wastewater flow.

The Brooks WWTP service area is primarily residential with limited industrial users. Four sanitary sewer lift stations convey flow from the collection system to the Brooks WWTP and the lift station design parameters are listed below in Table 2-1. These values are design values reported by PWWSB and have not been verified by field testing. Table 2-1 also shows estimates for ADF, MDF, and PHF based on runtimes of 6 hours, 15 hours, and 24 hours, respectively. These lift station operation times are estimations used for the three different flow conditions. Actual lift station runtimes for the four lift stations were not available for review or consideration. An instance of all four lift stations operating continuously for 24 hours is an extreme event, and this condition is meant to establish an estimated upper boundary condition flow rate that might be expected at the Brooks WWTP. This methodology assumes no sanitary sewer overflows (SSOs) and that all sanitary sewer flow is captured at the four lift stations and conveyed to Brooks.

Table 2-1. Pumping Capacity Summary for Lift Stations Serving Brooks WWTP

Lift Station	Design Flow (gpm)	Design TDH (ft)	Estimated Average Daily Operation (gpd)	Estimated Maximum Day Operation (gpd)	Estimated Peak Flow Operating Condition (gpd)
9-Whatley Avenue	1,000	164	360,000	900,000	1,440,000
10-Emily Avenue	80	60	28,800	72,000	115,200
15-Winchester Road	325	96	117,000	292,500	468,000
19-Ponderosa Pines	70	112	25,200	63,000	100,800
Total (gpd)			531,000	1,327,500	2,124,000
Total (MGD)			0.5	1.3	2.1

gpm = gallon(s) per minute

TDH = total dynamic head

gpd = gallon(s) per day

MGD = million gallon(s) per day

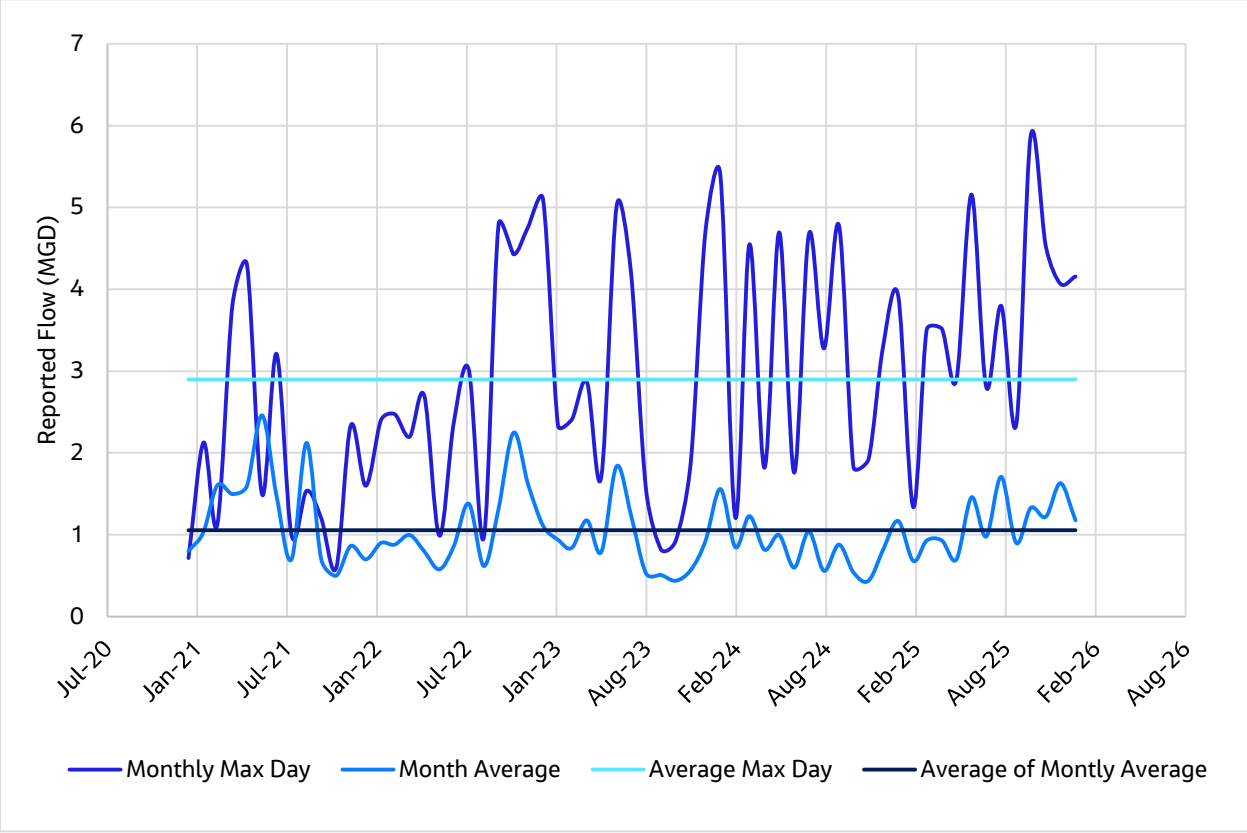
PWWSB staff report concern regarding the design flow rates for the lift stations and their accuracy. At this time, drawdown testing has not been performed to determine lift station operating flow rates. Additionally, it is reported that multiple stations are currently operating

with at least one pump out of service or on permanent bypass. Bypass pumping capacity likely varies from the design flow rate for the associated lift station. Attachment 1, May 2026 Monthly Lift Station Report, provides more information on the status of each lift station.

2.1.1.2 Discharge Monitoring Reports – Stanley Brooks WWTP

DMR information was downloaded from the ADEM online data base for review. Available DMRs report daily maximum flow rates and monthly average flow rates for the WWTP effluent. The Brooks WWTP does not currently provide onsite influent flow equalization. While there is expected to be flow rate dampening within the WWTP, the effluent flow rates have been assumed to align with influent flow rates for the purpose of this evaluation. Figure 2-1 shows the trend lines of maximum flow rates and monthly average flow rates reported in the DMR with averages of each data set reported.

Figure 2-1. Brooks WWTP DMR Effluent Flow Data



During discussion with PWWSB staff, potential for errors in reported DMR flow data was discovered. Operators report that the effluent flow is measured by a level transducer in a concrete junction box with a V-notch weir. During periods of high flow, the weir can become submerged, causing inaccurate readings from the level transducer. Figure 2-2 below shows this weir, transducer, and concrete junction box at the Brooks WWTP.

This error is evident in the DMR data where the maximum daily flows are reported as high as 6 MGD. For the purposes of this report, data points higher than 2.5 MGD are assumed to be outliers based on operator feedback and the design capacity of the lift stations pumping to the Brooks WWTP (refer to Table 2-1).

Figure 2-2. Brooks WWTP DMR Effluent Flow Rate Measuring



Additionally, the DMR data show that during the months of March, June, and September in 2021, the monthly average flow exceeds the maximum daily flows, which is not mathematically possible. Based on the calibration date stamped on the display (Figure 2-3), the measuring transducer appears to have last been calibrated in 2021.

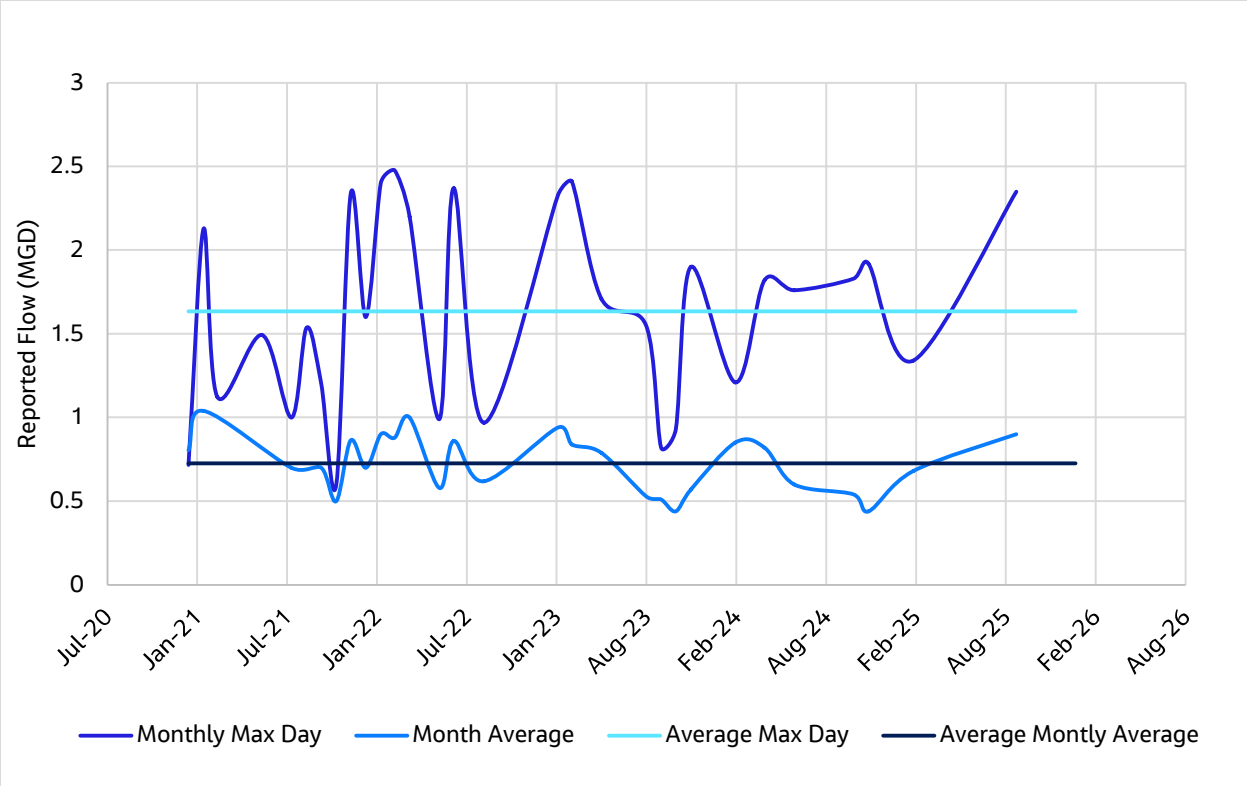
Figure 2-3. Brooks WWTP Effluent Flow Meter Calibration Date



To adjust for these discrepancies, periods of expected flow outliers exceeding 2.5 MGD in the DMR data were removed and the data were further evaluated. Figure 2-4 shows amended data with suspected outliers removed.

Figure 2-4 also shows an average of the monthly average effluent flows of approximately 0.75 MGD. This value would correlate to an assumed average daily rate. The average of the monthly max day effluent flows is approximately 1.63 MGD and would correlate to an assumed maximum daily flow rate.

Figure 2-4. Brooks WWTP DMR Effluent Flow Data – Amended



2.1.1.3 Stanley Brooks WWTP – Estimated Flow Rates

The wastewater influent flow rates at the Stanley Brooks WWTP were evaluated in multiple ways due to concerns with accuracy in recorded flow data. Table 2-2 below summarizes the flow rates in the two different evaluations detailed above and the proposed flow rates to use during design of potential system modifications. These flow rates are estimates based on best available data, which were identified to be incomplete or have potential flaws. Table 2-2 also provides a range of flows for each category to account for the incompleteness of the data available at this time.

Table 2-2. Brooks WWTP Influent Flow Rate Evaluation Result Summary

Parameter	Average Daily Flow (MGD)	Maximum Daily Flow (MGD)	Peak Hour Flow (MGD)
Influent Pumping Rates	0.5	1.3	2.1
Effluent Data in DMR	0.8	1.6	-
Estimated Design Flow Rates	**0.8**	**1.5**	**2.5**
Potential Range of Flows Based on Uncertainties	**0.7–1.0**	**1.0–2.0**	**2.0–4.0**

2.1.2 PWWSB Carlos Morris WWTP

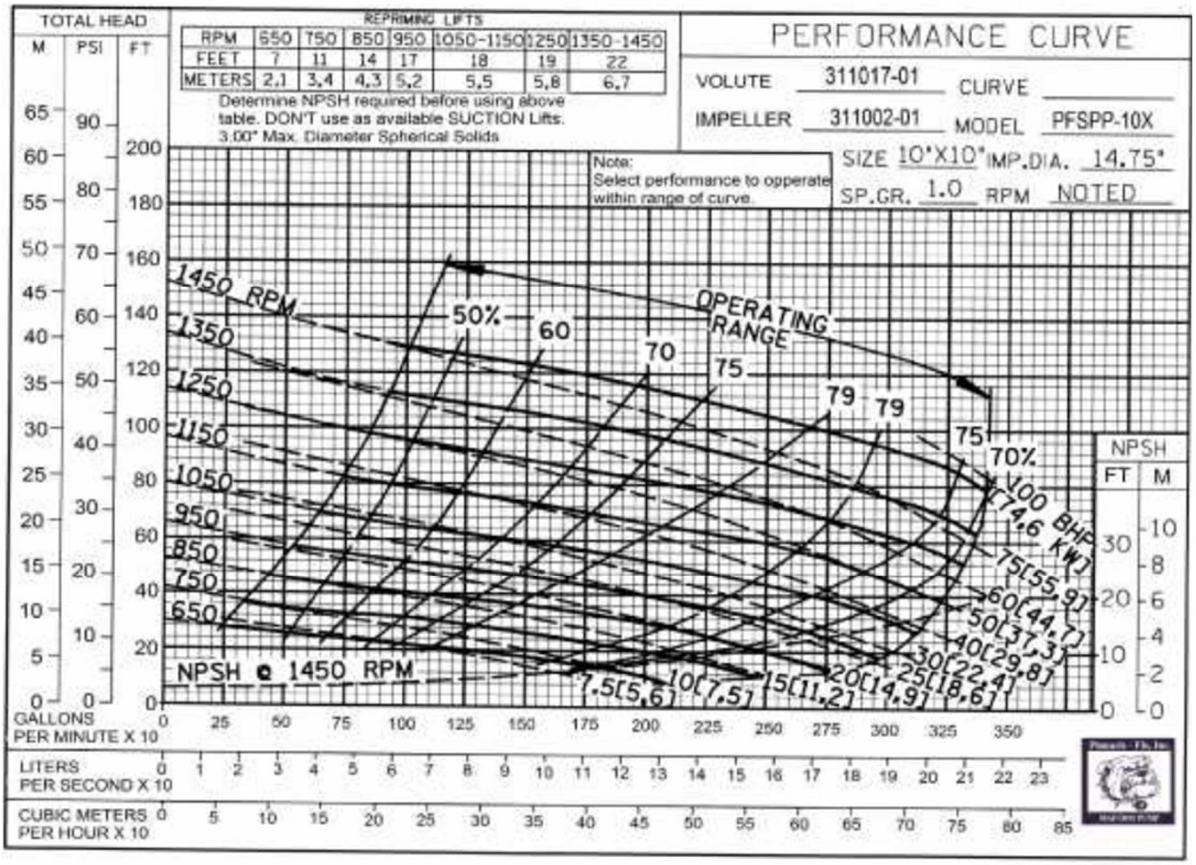
This section describes the methods used in estimating the flow from the Carlos Morris WWTP.

2.1.2.1 Master Lift Station Capacity at the Carlos Morris WWTP and Reported Sanitary Sewer Overflows

The Morris WWTP largely serves PWWSB service area east of Interstate 65 and has a monthly average design flow rate of 4.0 MGD. PWWSB is required to report monthly max daily flows and monthly average flows, but like Brooks WWTP, the permit does not include a specific flow limitation. The Morris WWTP service area is primarily residential with various industrial customers within the collection system.

Sanitary sewer is conveyed by various outlying lift stations to a network of gravity sewer surrounding the Morris WWTP. Sewer flow enters the Morris WWTP via a single 48-inch gravity sewer main, which routes flow to the Morris WWTP master lift station. The master lift station is equipped with four dry pit, self-priming type pumps. Figure 2-5 shows the pump curve and data sheet received from the manufacturer based on data plate information listed on the pumps.

Figure 2-5. Morris WWTP Master Lift Station Pump Curves



Motor name plate data show that the existing motors are 40 horsepower, and the master lift station operating TDH is estimated to be approximately 40 feet. Based on the information

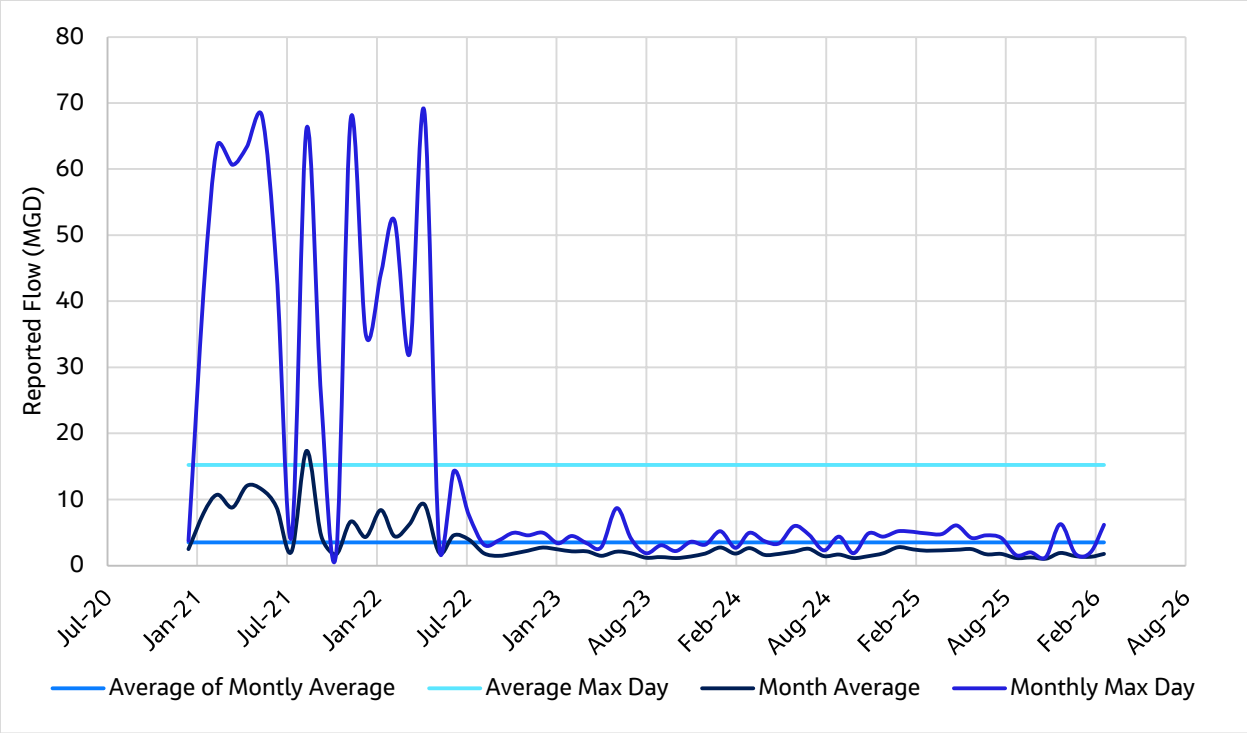
provided by the pump manufacturers, the master lift station pumps are expected to have a capacity of 2,450 gpm, or 3.5 MGD per pump. With three pumps in service and a redundant fourth pump as a standby, the master lift station is expected to have a design capacity of approximately 10.5 MGD. In practice, this assumption is conservative, as the capacity per pump is likely to decrease as additional pumps come online due to increased head pressures in the system. Average operating conditions are assumed to be a single pump operating 18 hours a day. This would correlate to an ADF rate of 2.6 MGD. At this time, master lift station runtimes are not available for review to confirm estimated flow rates.

During discussions with WWTP operation staff, it was reported that staff do not operate more than two pumps within the master lift station at a time due to hydraulic limitations within the Morris WWTP. If influent flows exceed the capacity of the two pumps in operation, assumed to be approximately 7.0 MGD, then the gravity collection system surcharges, increasing the likelihood of SSOs to occur within the collection system. Reported SSOs and estimated volumes of sewer associated with the overflows were received and considered as part of this evaluation. Peak influent flows are estimated to be the master lift station pumping rate plus the volume of sewer overflow. Two instances of SSOs occurred with the highest reported sewer overflow volume of approximately 2.1 MGD on May 25, 2025, and August 21, 2022, caused by heavy rainfall and flooding. If the Morris WWTP master lift station operated two pumps as reported by the operating staff, the peak influent flow rate for Morris could be estimated to be the 7.0 MGD from the master lift station and the 2.1 MGD of SSO or 9.1 MGD. This methodology has inherent flaws since the volumes associated with the SSOs are approximated by the PWWSB operating staff and not accurately measured by instrumentation. It is also assumed that the SSO and the associated volume occurred within a single day. However, the estimated peak influent rate does align with what the expected firm capacity, pumping capacity with the largest pump out of service, of the master lift station.

2.1.2.2 Discharge Monitoring Reports – Carlos Morris WWTP

DMR information was downloaded from the ADEM online data base for review. Available DMRs report daily maximum flow rates and monthly average flow rates for the WWTP effluent. The Morris WWTP does not currently provide onsite influent flow equalization. Although flow rate dampening within the WWTP is expected, the effluent flow rates have been assumed to align with influent flow rates for the purpose of this evaluation. Figure 2-6 shows the trend lines of maximum daily and monthly average flow rates reported in the DMR, as well as averages of each data set.

Figure 2-6. Morris WWTP DMR Effluent Flow Data



During discussion with PWWSB staff, the potential for errors in reported DMR flow data was discovered. Like Brooks WWTP, operators report that the effluent flow is measured by a level transducer in a concrete junction box with a contracted, sharp-crested rectangular weir. During periods of high flow, the weir can become submerged, causing inaccurate readings from the level transducer. Figure 2-7 below shows this weir, transducer, and concrete junction box at the Morris WWTP.

This error is evident in the DMR data, as the MDFs during some months exceed 12 MGD. These data points are expected to be outliers based on operator feedback. Staff also report operating protocol limiting the master lift station to two pumps operating at a time due to flow restrictions at the intermediate pump station within the WWTP that would not allow these dramatic flow rates to be possible.

Figure 2-7. Morris WWTP DMR Effluent Flow Rate Measuring



The measuring transducer calibration date was not visible at the time of the site visit, but the instantaneous flow measured at the time of the site visit was found to be 1.393 MGD according to the flow measuring device. With these factors in mind, periods of flow outliers exceeding 12 MGD in the DMR data were removed to improve the resolution of the data for further evaluation, as described below. Figure 2-8 shows amended data with suspected outliers removed.

Figure 2-8. Morris WWTP DMR Effluent Flow Data – Amended

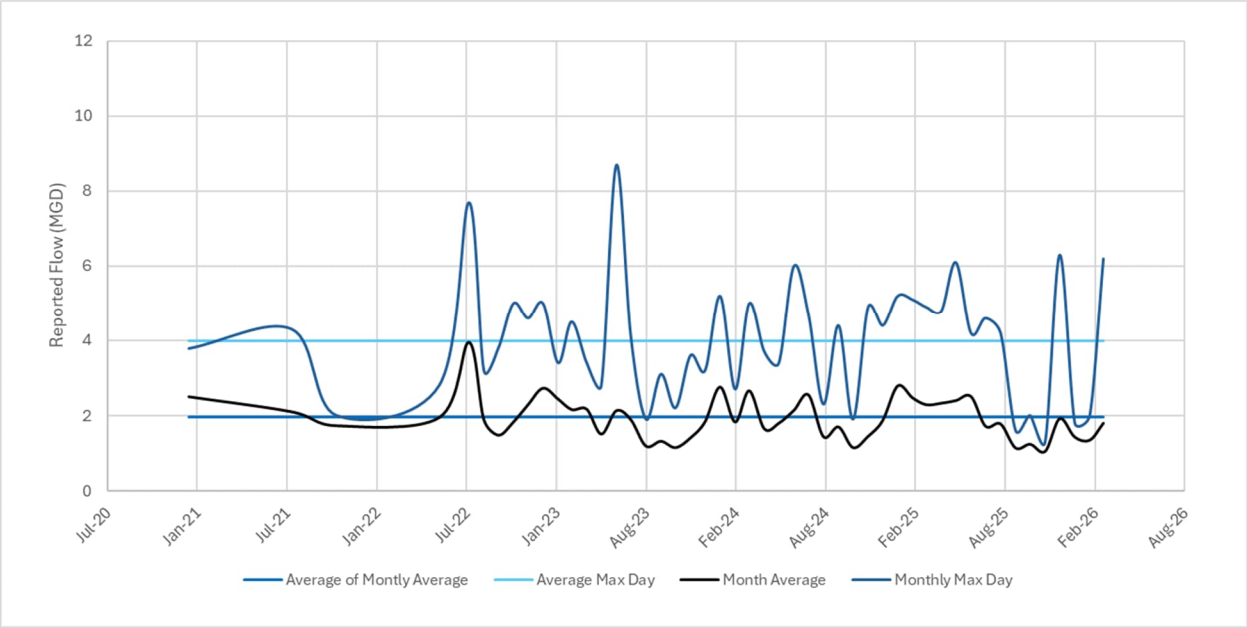


Figure 2-8 shows an average of the monthly average effluent flows of approximately 2.0 MGD. This value would correlate to an assumed average daily rate. The average of the monthly maximum day effluent flows is approximately 4.2 MGD and would correlate to an assumed MDF rate. The highest monthly max day shown is reported as 8.7 MGD in June 2023. This month was reported to have a historical rainfall total above the average monthly total. This value is expected to be representative of a maximum daily flow through the Morris WWTP. Additional data are required to confirm the assumptions made regarding the DMR data. Additionally, these data only account for flows entering the Morris WWTP and do not capture sanitary sewer that may have been lost due to SSOs.

2.1.2.3 Carlos Morris WWTP – Estimated Flow Rates

The wastewater influent flow rates at the Carlos Morris WWTP were evaluated in multiple ways due to concerns with accuracy in recorded flow data. Table 2-3 summarizes the flow rates in the three different evaluations detailed in the sections above and the proposed flow rates to use during design of potential system modifications. These flow rates are estimates based on best available data which was identified to be incomplete or have potential flaws. Table 2-3 also provides a range of flows for each category to account for the incompleteness of the data available at this time.

Table 2-3. Morris Influent Flow Rate Evaluation Result Summary

Parameter	Average Daily Flow (MGD)	Maximum Daily Flow (MGD)	Peak Hour Flow (MGD)
Master Lift Station Pumping Rates	2.6	-	9.1
Effluent Flow Data in DMR	2.0	8.7	-
Estimated Current Flow Rates	**2.5**	**6.0**	**10.0**
Potential Range of Flows Based on Uncertainties	**2.0–3.0**	**5.0–9.0**	**10.0–20.0**

2.1.3 MAWSS Wright Smith Jr. WWTP

This section describes the methods used in estimating the flow from the Smith WWTP.

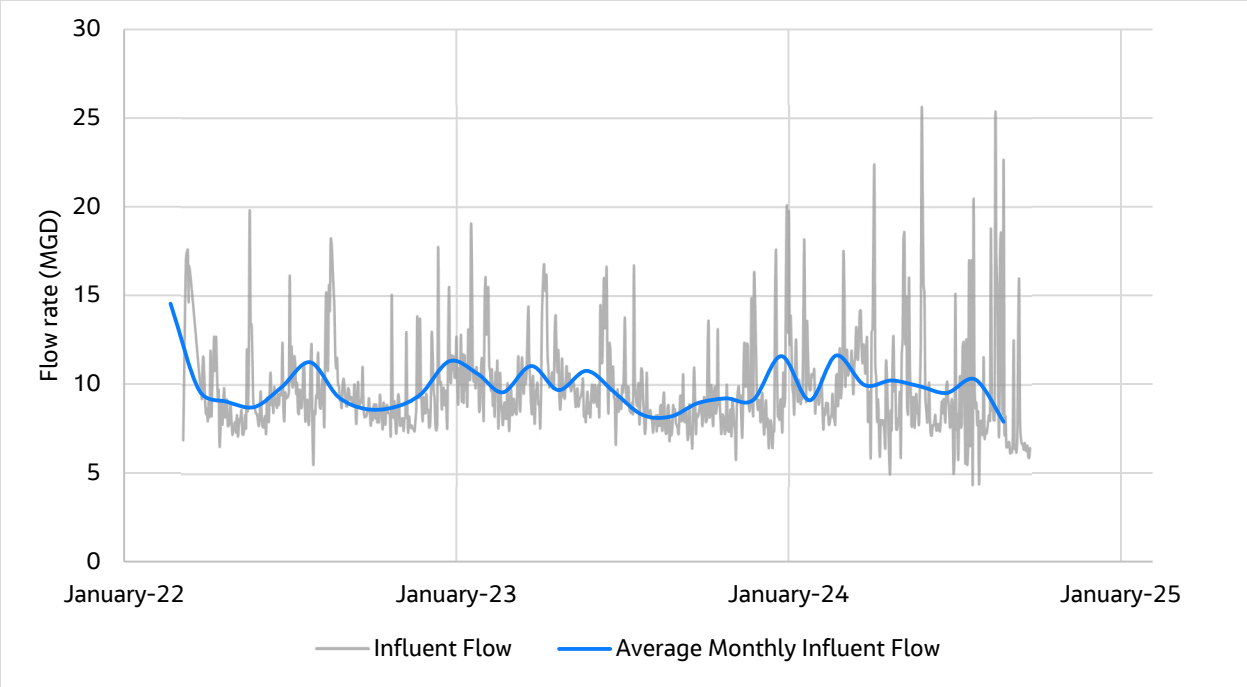
2.1.3.1 Master Lift Station Capacity at the Smith WWTP

The Smith WWTP largely serves MAWSS service area west of Interstate 65 and north of Three Mile Creek and has a monthly average design flow rate of 12.8 MGD. MAWSS is required to report MDFs and monthly average flows, but like Morris and Brooks WWTPs, the permit does not include a specific flow limitation. Sewer flow enters the Smith WWTP from the collection system via a single 54-inch gravity sewer main, which routes flow to the Smith WWTP master lift station. The master lift station is equipped with a total of five dry pit submersible pumps and has a design flow rate (four pumps in service and one redundant pump) of 30 MGD or 7.5 MGD per pump.

2.1.3.2 Smith WWTP Plant Data

The Smith WWTP monitors and records both influent and effluent daily flows. The influent values predominately align with the effluent values, and for the purpose of this evaluation only the influent values were considered. Figure 2-8 shows the daily influent values from January 2022 through September 2024 with average monthly influent values also plotted along the graph. Flow rate data were received from January 2022 to December 2025; however, operators report that the data from September 2024 to December 2025 may have flaws due to flow meter data settings. Therefore, the flawed data points for this period were excluded.

Figure 2-9. Smith WWTP Influent Flow Rate Measurements



The average monthly flows closely align with 9.4 MGD over the period of time considered. Additionally, maximum daily flows trend between 20 and 25 MGD. These data represent influent flows measured at the Smith WWTP and do not include the volume of wastewater diverted to severe weather attenuation facilities during wet weather events. Data from these severe weather facilities were analysed and the maximum daily flow was found to be approximately 29.5 MGD. The assumed current flow rates for the Smith WWTP are listed in Table 2-4.

Table 2-4. Smith Influent Flow Rate Evaluation Result Summary

Parameter	Average Daily Flow (MGD)	Maximum Daily Flow (MGD)	Peak Hour Flow (MGD)
Master Lift Station Pumping Rates	-	-	30.0
Influent Flow Data	9.4	25.0	-
Historical Flow Rates	**9.4**	**25.0–29.5**	**30.0**

To account for any future growth that will occur in Smith's service area, a 2% annual growth rate was applied to the Smith WWTP flows and loadings to develop a 20-year planning projection. Max Monthly Daily Flow (MMADF) values are typically used for flow projection. These values may differ slightly from ADF and MDF but largely correlate to the flow conditions considered. Projected average annual daily flow (AADF) increases from 9.4 MGD in 2026 to 13.9 MGD in 2046, with corresponding increases in MMADF and MDF to 16.9 MGD and 37.1 MGD, respectively (Table 2-5).

Table 2-5. Projected Flows for Smith WWTP

Year	AADF (MGD)	MMADF (MGD)	MDF (MGD)
2026	9.4	11.4	25
2046	13.9	16.9	37.1

2.2 Proposed Flows Consolidation

As part of this evaluation, flows from the Brooks and Morris WWTP are expected to be conveyed to the Smith WWTP for treatment. The Smith WWTP is reported to have a maximum hydraulic capacity of 30 MGD. The wastewater flows from the Morris and Brooks WWTPs will be restricted due to limitations at the Smith WWTP and attenuation will be required at one or both WWTPs to stay within the current Smith WWTP capacity. The sections below summarize the WWTP flow consolidation approach and estimated flow rates discussed in the sections above. Required storage volumes are expected to be required to reduce MDFs to less than the hydraulic capacity limitation at the Smith WWTP. The total storage volume will be determined through further design development and discussion with operation staff.

Consolidation of wastewater flows from Brooks and Morris WWTPs is expected to occur either by a manifolded force main serving the two facilities, Brooks pumping flow to Morris for repumping to Smith, or diverting the four lift stations dedicated to Brooks directly to Morris. Under these conditions, the assumed flow rates for the total MDF related to Brooks and Morris is estimated to be between 6.0 and 11.0 MGD. Considering the estimated influent MDF measured at the Smith WWTP was 25.0 MGD, the total maximum daily flow expected from all three WWTPs would be between 31.0 and 36.0 MGD. Table 2-6 summarizes the estimated 2026 average day and maximum day flow rates for each facility. These flow rates are estimated based on engineering judgment and best available data, which is expected to be incomplete or have potential flaws. Installation of a flow meter on the influent main at Brooks and flow measurement equipment within the gravity collection system surrounding Morris would be required to gather more accurate data to better inform the flow estimation for the PWWSB WWTPs.

Table 2-6. Smith Influent Flow Rate Evaluation Result Summary

Location	Average Daily Flow (MGD)	Maximum Daily Flow (MGD)
Brooks WWTP	0.7–1.0	1.0–2.0
Morris WWTP	2.0–3.0	5.0–9.0
Smith WWTP	9.4	25.0

3. Organic and Nutrient Loading Historical Projection

This section presents the historical data analysis for organic and nutrient loading and projections for the Brooks, Morris, and Smith WWTPs.

3.1 PWWSB Stanley Brooks WWTP

As discussed, the Brooks WWTP largely serves PWWSB service area west of Interstate 65 and has a design flow rate of 1.5 MGD WWTP on a monthly average basis. PWWSB is required to report monthly max daily flows and monthly average flows, along with monthly and weekly average influent concentrations from total suspended solids (TSS) and 5-day carbonaceous biochemical oxygen demand ($CBOD_5$). The Brooks WWTP service area is primarily residential with limited industrial users.

Influent $CBOD_5$ and TSS is reported to be sampled at least twice a week with weekly and monthly average loadings being reported in the Brooks DMR. Influent $CBOD_5$ and TSS concentrations (milligrams per liter [mg/L]) and total loadings (pounds per day [lb/day]) were each reported in the DMR and were used to estimate flow rates for individual sampling months for 2021 through 2025. Since daily flow values were not available, the max month AADFs were estimated using the average and peak flows shown in the Brooks DMR data. Table 3-1 shows a summary of these results.

Table 3-1. Brooks WWTP Reported Influent TSS and $CBOD_5$ Concentrations

Parameter	TSS (mg/L)	TSS (lb/day)	$CBOD_5$ (mg/L)	$CBOD_5$ (lb/day)	MMADF (MGD)
Weekly Average	132	1101	73	678	1.0
Monthly Average	102	851	63	521	1.0
Current Max Month Estimated Loading	132	1101	73	678	1.0

Note the $CBOD_5$ and TSS concentrations are significantly lower than the $CBOD_5$ and TSS concentrations typically seen entering a wastewater treatment plant of 150 mg/L or greater.

This is discussed further in Section 3.3, but this shows there are significant I/I issues that are contributing to the dilution of these concentrations. These I/I contributions need to be properly identified and quantified before any permanent decisions are made.

3.2 PWWSB Carlos Morris WWTP

As previously mentioned, the Morris WWTP largely serves PWWSB service area east of Interstate 65 and has a design flow rate of 4.0 MGD on a monthly average basis. PWWSB is required to report monthly max daily flows and monthly average flows, along with monthly and weekly average influent concentrations and loading from TSS and $CBOD_5$. The Morris WWTP service area is primarily residential with various industrial customers within the collection system. Significant industrial customers include Miller Transport, Inc. (7,000 gpd) and International Paper-Chunchula (6,000 gpd).

Influent $CBOD_5$ and TSS are reported to be sampled at least twice a week with weekly and monthly average loadings being reported in the Morris WWTP DMR. Influent $CBOD_5$ and TSS concentrations (mg/L) and total loadings (lb/day) were each reported in the DMR and were used to estimate flow rates for individual sampling months for 2021 through 2025. Since daily flow

values were not available, the max month AADFs were estimated using the average and peak flows shown in the Morris DMR data. Table 3-2 shows a summary of these results.

Table 3-2. Morris WWTP Reported Influent TSS and $CBOD_5$ Concentrations

Parameter	TSS (mg/L)	TSS (lb/day)	$CBOD_5$ (mg/L)	$CBOD_5$ (lb/day)	MMADF (MGD)
Weekly Average	205	7,694	97	3,640	4.5
Monthly Average	192	7,206	92	3,453	4.5
Current MM Estimated Loading	205	7,694	97	3,640	4.5

As mentioned in Section 3.1, the $CBOD_5$ and TSS concentrations are significantly lower than the $CBOD_5$ and TSS concentrations typically seen entering a wastewater treatment plant of greater than 150 mg/L. This is discussed further in Section 3.3, but this shows there are significant I/I issues contributing to the dilution of these concentrations. These I/I contributions need to be properly identified and quantified before any permanent decisions are made.

3.3 PWWSB Nutrient Loading Assumptions

The $CBOD_5$ concentrations for both PWWSB WWTPs are lower than typical $CBOD_5$ influent values that would be expected entering a wastewater treatment plant (less than 150 mg/L). However, after consulting plant staff and reviewing typical $CBOD_5$ loading per capita values, the current population of approximately 20,000 and average pounds per day of $CBOD_5$ from both plants were used to calculate the lb $CBOD_5$ per capita per day for the whole of the PWWSB service area. The resulting value of ~0.2 lb $CBOD_5$ per capita per day was within the typical ranges of 0.11 – 0.26 lb $CBOD_5$ per capita per day. The lower $CBOD_5$ values are believed to be most likely partially attributed to the large I/I of this system. Therefore, the $CBOD_5$ DMR data are deemed acceptable and will be used for this assessment.

ADEM does not require the Brooks WWTP or the Morris WWTP to report its influent nitrogen loadings, including total Kjeldahl nitrogen (TKN) and ammonia. Therefore, minimal nitrogen loading historical data was available for the two PWWSB plants. Using a typical $CBOD_5$ and NH_3 ratio of 6:1, the influent ammonia concentrations entering Brooks WWTP are assumed to be 12 mg/L and Morris WWTP are assumed to be 16 mg/L.

3.4 MAWSS Wright Smith Jr. WWTP Organic and Nutrient Loading Projections

As noted in Section 2, the Smith WWTP is the second largest WWTP owned and operated by MAWSS. The Smith WWTP provides secondary wastewater treatment for the northern portion of the MAWSS service area with a design average annual daily flow capacity of 12.8 mgd.

Historical influent loading data from January 2022 through December 2025 were compiled for Smith WWTP and annual average day concentration (AADC), annual average day loading (AADL), maximum monthly average day loading (MMADL), and maximum day loading (MDL) were calculated and summarized in Tables 3-3 through 3-5.

Table 3-3. Influent TSS Data at Smith WWTP (2022–2025)

Year	AADC (mg/L)	AADL (lb/day)	MDL (lb/day)	MMADL (lb/day)
2022	158	9,538	34,371	13,546
2023	151	11,234	33,406	17,797
2024	158	11,271	32,440	14,114
2025	156	9,467	24,887	16,038
Average TSS	156	10,378	31,276	15,374

Table 3-4. 2022 through 2025 Influent $CBOD_5$ Data at Smith WWTP (2022–2025)

Year	AADC (mg/L)	AADL (lb/day)	MDL (lb/day)	MMADL (lb/day)
2022	127	9,267	27,113	13,472
2023	128	10,443	41,394	13,367
2024	122	10,301	50,470	11,864
2025	124	7,993	26,261	10,387
Average $CBOD_5$	125	9,501	36,309	12,273

Table 3-5. Influent NH_3 Data at Smith WWTP (2022–2025)

Year	AADC (mg/L)	AADL (lb/day)	MDL (lb/day)	MMADL (lb/day)
2022	23	1,633	4,029	2,791
2023	20	1,656	3,587	1,972
2024	15	1,218	5,711	2,050
2025	20	1,562	5,107	2,078
Average NH_3	20	1,517	4,609	2,223

TSS loading data included several values exceeding 35,000 lb/day (Figure 3-1). Based on expected $CBOD_5$/TSS ratios of 0.7 to 1.2 and consultation with plant operations staff, these values were considered unrepresentative of typical plant operation and were excluded from further analysis. Following removal of these data points, the average annual daily TSS load was calculated as 10,378 lb/day (Figure 3-2). However, the influent organic and nutrient loadings during the 2022 and 2025 time frame were consistently lower than the historical averages reported for the 2014 to 2017 period (Table 3-6).

Figure 3-1. Influent TSS Loads at Smith WWTP (2022 through 2025)

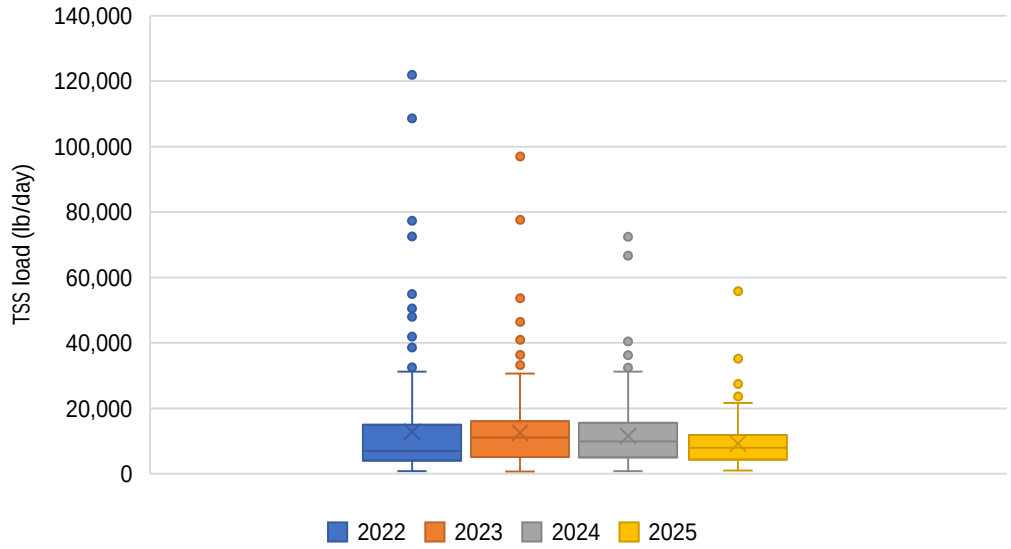


Figure 3-2. Influent TSS Loads at Smith WWTP Following Outlier Removal (2022 through 2025)

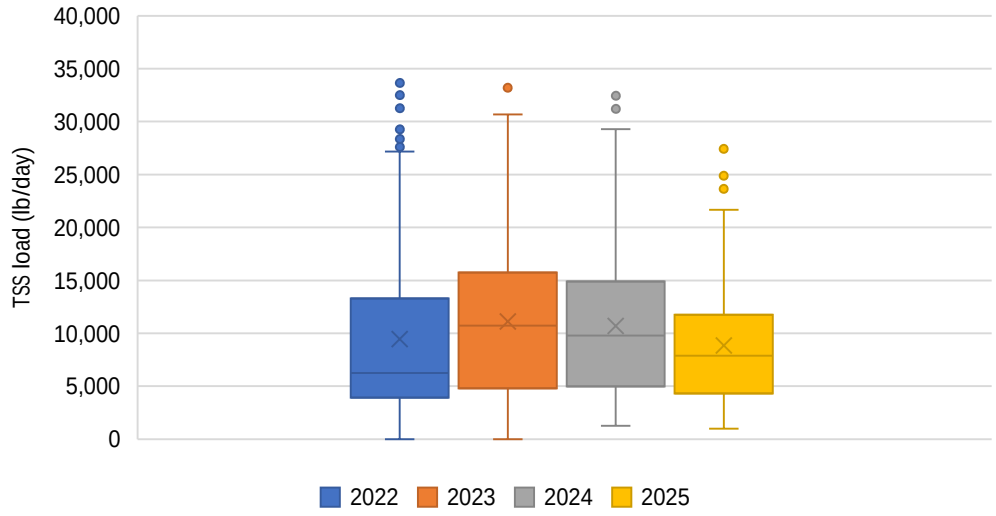


Table 3-6. Influent Organic and Nutrient Loadings at Smith WWTP (2014 through 2017)

	AADC (mg/L)	AADL (lb/day)	MDL (lb/day)	MMADL (lb/day)
TSS	195	15,130	56,435	20,728
$CBOD_5$	170	13,196	36,421	17,683
NH_3	22	1,668	4,137	2,352

Review of historical data from 2014 through 2025 indicates a sustained reduction in $CBOD_5$ and TSS concentrations and loadings beginning in 2018 (Figure 3-3 through 3-5). Current $CBOD_5$ and TSS loadings are approximately 25 percent lower than pre-2018 conditions (Tables 3-6 and 3-7). Flow data for 2021 were available only from January through April, resulting in an MDF of 11.7 MGD. Notwithstanding, influent organic and nutrient loadings from 2022 through 2025 are consistent with the post-2018 trends and are considered representative of current plant conditions.

Figure 3-3. Historical Influent Flow Conditions and Rainfall at Smith WWTP (2014 through 2025)

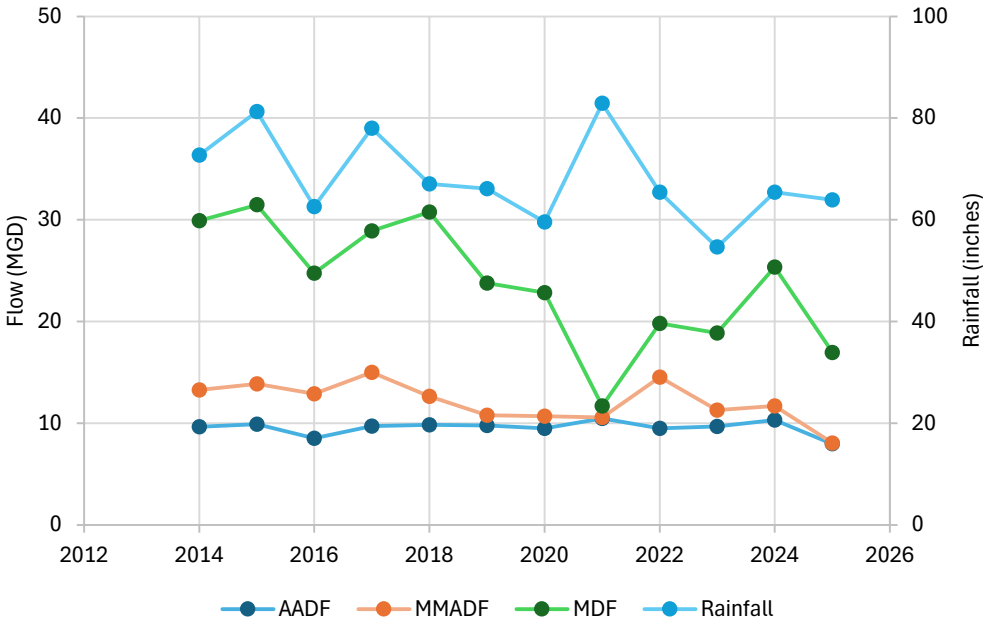


Figure 3-4. Historical Influent Nutrient and Organic Loading at Smith WWTP (2014 through 2025)

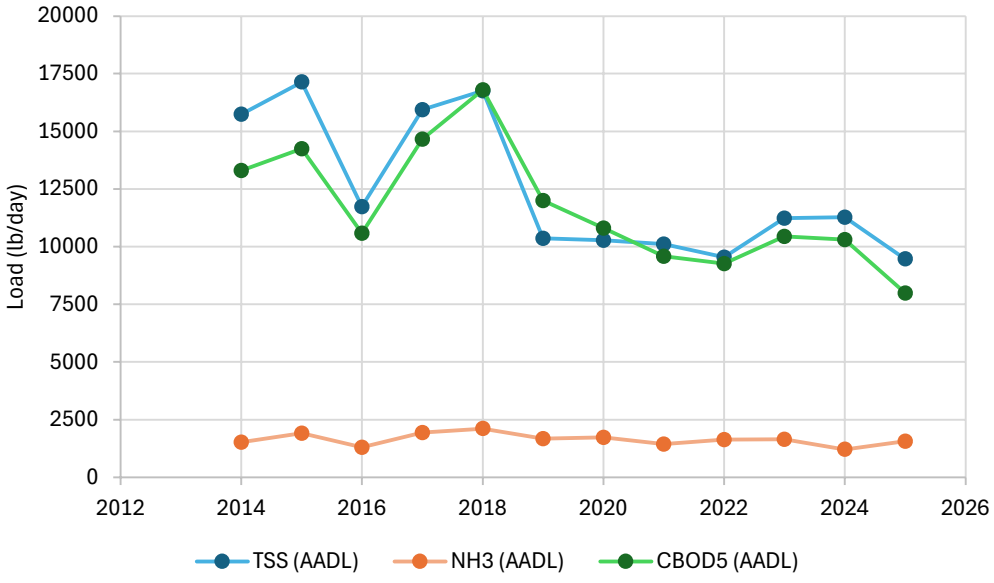
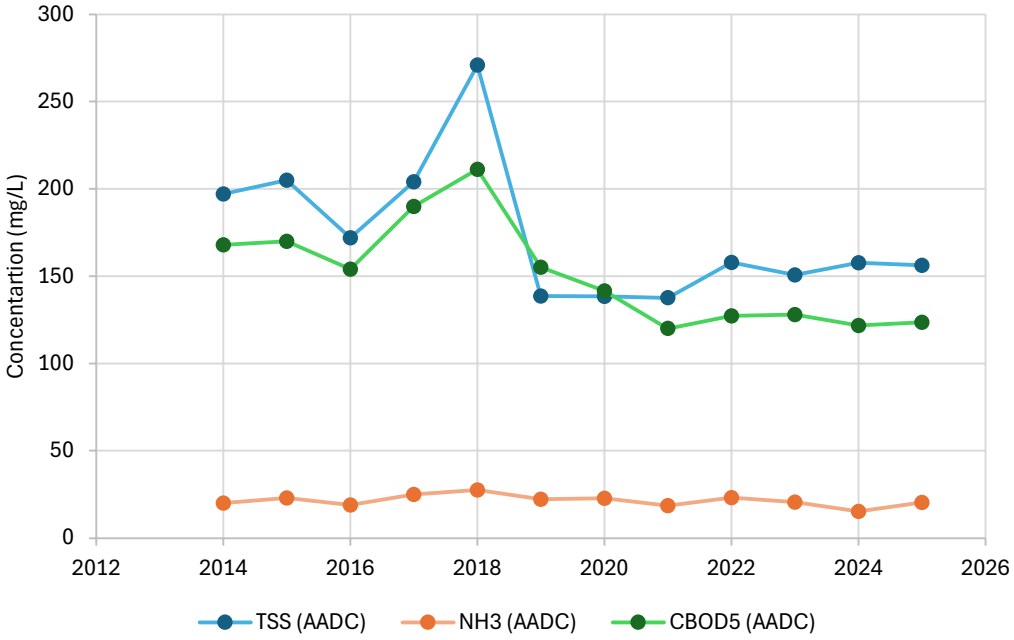


Figure 3-5. Historical Influent Nutrient and Organic Concentration at Smith WWTP (2014 through 2025)



Therefore, the 2022–2025 influent data at the Smith WWTP were considered representative of current plant conditions. The average influent organic and nutrient loadings from this period (Table 3-7) will be used for this effort as the design loadings. Note similar methods for estimating the organic and nutrient loadings into the Smith plant were used to estimate the max month AADF, which will be used as the design flow.

Table 3-7. Influent Organic and Nutrient Loadings at Smith WWTP (2022 through 2025)

	AADC (mg/L)	AADL (lb/day)	MDL (lb/day)	MMADL (lb/day)	MMADF (mgd)
TSS (lb/day)	162	10,378	31,276	15,374	11.4
$CBOD_5$ (lb/day)	129	9,501	36,309	12,273	11.4
NH_3 (lb/day)	23.4	1,517	4,609	2,223	11.4

4. Max Month Daily Flows and Max Month Combined Loadings

The maximum month flow and loading were developed by combining the current influent contributions from PWWSB's wastewater treatment facilities with those from the Smith WWTP. Table 4-1 shows a summary of the combined max month design flows and loading for the PWWSB WWTPs (Brooks WWTP and Morris WWTP) and Smith WWTP currently seen at those plants.

Table 4-1. PWWSB WWTPs and Smith WWTP Historical Flows and Loading Combined

Parameter	MMADF	MMADL TSS		MMADL $CBOD_5$		MMADL NH_3	
	MGD	lb/day	mg/L	lb/day	mg/L	lb/day	mg/L
Brooks WWTP	1	1,101	132	609	73	100	12.0
Morris WWTP	4.5	7,694	205	3,640	97	600	16.0
PWWSB WWTPs Total	5.5	8,807	192	4,266	93	702	15.3
Smith WWTP	11.4	15,374	162	12,273	129	2,223	23.4
Total	16.9	24,169	171	16,522	117	2,924	20.7

A 20-year planning period was selected to project the future flows and loads that may be received by the Smith WWTP in 2046. An average annual growth rate of 2 percent is projected for the Smith WWTP. It is assumed there will be no increase in sewers or loading within the PWWSB collection system; therefore, the 2046 flow and loading is assumed to match the current 2026 flows. Table 4-2 shows a summary of the projected 2046 max month flows and loading for the PWWSB WWTPs and Smith WWTP.

Table 4-2. PWWSB WWTPs and Smith WWTP Projected Flows and Loading Combined

Parameter	MMADF	MMADL TSS		MMADL $CBOD_5$		MMADL NH_3	
	MGD	lb/day	mg/L	lb/day	mg/L	lb/day	mg/L
2046 PWWSB WWTPs combined*	5.5	8,807	192	4,266	93	702	15.3
2046 Smith WWTP	16.9	22,833	162	18,182	129	3,298	23.4
Total	22.4	31,640	169	22,448	120	4,000	21.4

*It has been identified that the PWWSB WWTP flows are unreliable due to excessive I/I issues in their system. The flows for PWWSB WWTPs are based off the minimal data and assumptions and need to be verified prior to any permanent design decisions.

5. Environmental Permit and Proposed Change

Consolidation of the PWWSB's two wastewater treatment facilities and associated collection systems with the MAWSS collection and treatment systems will result in new regulatory requirements for MAWSS. In the short term, these new requirements would include operation, maintenance, monitoring, reporting, and compliance obligations associated with both the Brooks and the Morris WWTPs and sanitary sewer collection systems. In addition, PWWSB is currently under obligation to satisfy the requirements of a Consent Order with ADEM to correct violations of the National Pollutant Discharge Elimination System (NPDES) permit provisions at both the Brooks and Morris WWTPs (Attachment 3). If MAWSS becomes the owner/operator of PWWSB's wastewater collection and treatment facilities, the Consent Order obligations would likely be transferred to MAWSS.

In the longer term, if the two PWWSB wastewater treatment facilities are decommissioned and wastewater is pumped to the MAWSS Smith WWTP, a modification of the Smith WWTP NPDES permit will be required. This modification will likely trigger new water quality analyses by ADEM that could result in slightly more stringent permit limitations, including an increase in the instream waste concentration at which whole effluent toxicity tests are performed. The obligation to maintain and operate the Brooks and Morris sanitary sewer collection systems would become part of the new/modified NPDES permit for the Smith WWTP. Attachment 2 presents an in-depth review of the existing and likely NPDES permit requirements.

Existing discharge permit limits are listed in Table 5-1 based on the current NPDES permit for the Smith WWTP discharge to the Mobile River. For the purposes of this technical memorandum, the future discharge limits were estimated based on two potential conditions. The first condition assumes ADEM will maintain the existing discharge limit from a mass based loading and the second condition assumes the existing effluent concentrations will be maintained. Tables 5-2 and 5-3 show the potential future discharge limits based on these two conditions at the estimated effluent flow rate of 16.9 MGD.

On August 6, 2026, ADEM provided a draft NPDES permit for the Smith WWTP to MAWSS for review and comment within 30 days. The draft permit includes several changes from the current permit, including new effluent limits for minimum dissolved oxygen (DO) concentration in the effluent, enterococci bacteria limits, new total residual chlorine limits, and new whole effluent toxicity testing requirements for the discharge to the Mobile River. There were, however, no changes to TSS, $CBOD_5$, and ammonia nitrogen effluent limits. The effluent limits included in the draft permit for the Smith WWTP discharge to the Mobile River are reflected in the potential future effluent limitations shown in Tables 5-2 and 5-3.

Table 5-1. Current Discharge Limitations and Monitoring Requirements for the Smith WWTP (AL0023094) – Mobile River

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
DO			3.0, mg/L			Effluent	Grab	5 days per week	May – Nov.
DO			5.0, mg/L			Effluent	Grab	5 days per week	Dec. – Apr.
pH			6.0 S.U.	9.0 S.U.		Effluent	Grab	5 days per week	
TSS	3,202 lb/day 30.0 mg/L	4,803 lb/day 45.0 mg/L				Effluent	24-hour Composite	5 days per week	
TSS	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
Total Ammonia Nitrogen	2,135 lb/day 20.0 mg/L	3,202 lb/day 30.0 mg/L				Effluent	24-hour Composite	2 days per week	
TKN	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Nitrite + Nitrate Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Phosphorus	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Flow through Treatment Plant	Report MGD			Report MGD		Effluent	Continuous	7 days per week	

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Total Residual Chlorine	1.00 mg/L			1.00 mg/L		Effluent	Grab	5 days per week	
Enterococci	Report col/100mL			275 col/100 mL		Effluent	Grab	5 days per week	
$CBOD_5$	2,668 lb/day 25.0 mg/L	4,003 lb/day 37.5 mg/L				Effluent	24-hour Composite	5 days per week	
$CBOD_5$	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
$CBOD_5$ Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
TSS Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
Total Recoverable Mercury	Report, mg/L			Report, mg/L		Effluent	Grab	1 day per quarter	

col/100mL = colonies per 100 milliliters

S.U. = Standard Units

Table 5-2. Potential Future Discharge Limitations and Monitoring Requirements for the Smith WWTP Discharge to the Mobile River Based on Loading as Limiting Factor

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
DO			3.0, mg/L			Effluent	Grab	5 days per week	May – Nov.
pH			6.0 S.U.	9.0 S.U.		Effluent	Grab	5 days per week	
TSS	3,202 lb/day 22.7 mg/L	4,803 lb/day 34.1 mg/L				Effluent	24-hour Composite	5 days per week	
TSS	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
Total Ammonia Nitrogen	2,135 lb/day 15.1 mg/L	3202 lb/day 22.7 mg/L				Effluent	24-hour Composite	2 days per week	
TKN	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Nitrite + Nitrate Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Phosphorus	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Flow through Treatment Plant	Report MGD			Report MGD		Effluent	Continuous	7 days per week	
Total Residual Chlorine	0.029 mg/L			0.042 mg/L		Effluent	Grab	5 days per week	

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Enterococci	35 col/100mL			158 col/100 mL		Effluent	Grab	5 days per week	May – Oct.
Enterococci	Report col/100mL			275 col/100 mL		Effluent	Grab	5 days per week	Nov. – Apr.
$CBOD_5$	2,668 lb/day 18.9 mg/L	4,003 lb/day 28.4 mg/L				Effluent	24-hour Composite	5 days per week	
$CBOD_5$	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
$CBOD_5$ Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
TSS Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
Total Recoverable Mercury	Report, mg/L			Report, mg/L		Effluent	Grab	1 day per quarter	

Table 5-3. Potential Future Discharge Limitations and Monitoring Requirements for the Smith WWTP Based on Concentration as Limiting Factor

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
DO			3.0, mg/L			Effluent	Grab	5 days per week	
pH			6.0 S.U.	9.0 S.U.		Effluent	Grab	5 days per week	
TSS	4,228 lb/day 30.0 mg/L	6,343 lb/day 45.0 mg/L				Effluent	24-hour Composite	5 days per week	
TSS	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
Total Ammonia Nitrogen	2,819 lb/day 20.0 mg/L	4,228 lb/day 30.0 mg/L				Effluent	24-hour Composite	2 days per week	
TKN	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Total Nitrite + Nitrate Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Phosphorus	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Flow through Treatment Plant	Report MGD			Report MGD		Effluent	Continuous	7 days per week	
Total Residual Chlorine	0.029 mg/L			0.042 mg/L		Effluent	Grab	5 days per week	
Enterococci	35 col/100mL			158 col/100 mL		Effluent	Grab	5 days per week	May – Oct.
Enterococci	Report col/100mL			275 col/100 mL		Effluent	Grab	5 days per week	Nov. - Apr.
$CBOD_5$	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
$CBOD_5$ Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
TSS Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
Total Recoverable Mercury	Report, mg/L			Report, mg/L		Effluent	Grab	1 day per quarter	

Attachment 1
May 2026 Lift Station Report

Monthly Lift Station Report

MAY 2026

1. **West Highland Ave:**

   Pump #2 is clogged & offline. A confined space entry permit is required to correct the problem. Pump 1 needs a new meter. There were no further issues at this station.

2. **McCants and Owens:**

   There were no issues at this station.

3. **First and Owens:**

   Pump #1 is at Hydra Services for evaluation/repair. There is a bypass pump at this location. There were no further issues at this station.

4. **First and Hanes:**

   The pump guide rails are in need of repair. There is a bypass pump installed at this station. The bypass pump is operating an average of 3.8 hours a day. There were no further issues at this station.

5. **Rich Avenue:**

   Both pumps at this location have stopped working. There is a bypass pump at this location operating an average of 5.5 hours a day. There were no issues at this station.

6. **MLK Jr (Craft Hwy) and Elm St:**

   Pump #2 motor saver installed 5/25/26. Pump #2 HOA switch needs to be replaced.

7. **Pershing St:**

   Pump # 2 motor was replaced by Sheppard Electric 3/9/2026. The door on the pump house is compromised and needs to be replaced. The roof is caving in above the entrance. The control panel is very old. Paul with Jim House & Associates has recommended replacing both pumps and entire control panel. There were no further issues at this station.

8. **Alabama Village:**

   Both pumps need to be replaced & the panel box is damaged. Hydra Service sent a quote 5/20/2025. There is a bypass pump installed at this location operating an average of 3.5 hours per day. There were no further issues at this station.

9. **Whatley Avenue:**

   Pump #2 pulled for evaluation by Hydra Service. Pump #3 soft start faulting on phase loss. Bypass set up at this location.

10. Emily Avenue:

There were no further issues at this station .

11. Atmore Avenue:

Bypass pump at this location operating 3.5 hrs. daily. There were no further issues at this station.

12. Hand Avenue:

Pump #1 was pulled by Hydra Services for evaluation/repair 3/19/2026. There are no connections for a bypass pump

14. Highway 45:

There is a bypass pump at this location operating 2.5 hrs. Hydra Service delivered both pumps to the warehouse for this lift station on 7/22/2025. Unable to install pumps due to blockage. There were no issues at this station.

15. Winchester Road:

Pump #2 needs a new pump assembly. The soft start for pump 1 is bad. Paul with Jim House is looking into possible warranty replacement. Pump 1 is running on the electrical connections for pump 2 temporarily. There were no further issues at this station.

16. Garrison Avenue:

Both ABS Piranha 2hp grinder pumps have to be pulled and unclogged frequently. Paul with Jim House & Associates has recommended this station be upgraded to a phase conversion panel and install 3-phase pumps. There are no connections for a bypass pump. There were no further issues at this station.

17. Whistler Street:

There were no further issues at this station.

18. Turner Road:

There are no connections for a bypass pump. There were no further issues at this station.

19. Ponderosa Pines:

There are no connections for a bypass pump. There were no further issues at this station.

20. Lott Rd & University:

Pump 2 installed 1-12-2026 by Hydra Service. There were no further issues at this station.

21. Lott Rd & Suncrest:

There were no further issues at this station.

22. Norwood Pointe:

Pump (1) needs to be pulled. There were no further issues at this station.

2**3. Outlaw Road:**

Pump 1 installed 1-9-2026 by Hydra Service. Pump 2 not installed.

24. Ontario Drive:

There were no issues at this station.

25. Pineridge Drive:

Pump #1 is at Hydra Services for evaluation/repair. There were no further issues at this station.

26. Blount High School:

Pump #1 has to be reset daily. There were no issues at this station.

27. Bearfork & 8 Mile Creek:

There were no issues at this station.

28. Bearfork & University:

Pump 1 is offline, needs to be pulled. Pump 2 needs a motor saver replacement

29. Bearfork & Jarrett Road:

There were no issues at this station.

30. Salem Avenue:

There were no further issues at this station.

***** There are currently water leaks getting into station #'s: 4, 5, 6, 7, 8, 11, 14, 20, and 23. *****

Attachment 2
Regulatory Review

Regulatory Review

Consolidation of the Prichard Water Works and Sewer Board (PWWSB) with the Mobile Area Water and Sewer System (MAWSS) will result in new regulatory requirements for MAWSS when the utility assumes ownership and control of the sanitary sewer collection system and the PWWSB's two wastewater treatment facilities.

MAWSS will have operation, maintenance, and compliance responsibilities for the PWWSB sanitary sewer collection system and the two PWWSB wastewater treatment plants (WWTPs), Stanley Brooks WWTP (Brooks WWTP) and Carlos Morris WWTP (Morris WWTP). It is anticipated that once evaluation and design are complete, MAWSS will replace the two PWWSB WWTPs with flow equalization basins and pumping stations to transfer all wastewater to the MAWSS Wright Smith Jr. WWTP (Smith WWTP).

While the two PWWSB WWTPs are operational, MAWSS will have all monitoring, reporting, and compliance responsibilities specified in the National Pollutant Discharge Elimination System (NPDES) permits for the Brooks WWTP and the Morris WWTP, including operation of the sanitary sewer collection systems. Discharges from these two WWTPs and their collection systems are regulated by the Alabama Department of Environmental Management (ADEM) and must comply with the terms specified in NPDES permit number AL0055204 for the Brooks WWTP and NPDES permit number AL0023205 for the Morris WWTP.

Brooks WWTP

The Brooks WWTP, located at the end of Aldock Road in Prichard, Alabama (latitude 30.774324°, longitude -88.097695°), has a design treatment capacity of 1.5 million gallons per day (MGD). The facility discharges treated municipal wastewater to Chickasaw Creek and stormwater to Eight Mile Creek. The current NPDES permit for this facility was issued by ADEM in May 2020 and became effective on June 1, 2020. The permit was due to expire on May 31, 2025, but has been administratively extended pending ADEM's review of PWWSB's permit renewal application. The current monitoring and reporting requirements and effluent limitations for the Brooks WWTP are summarized in Table A-1. It is likely that these requirements will remain the same when MAWSS assumes responsibility for this treatment facility.

Table A-1. Discharge Limitations and Monitoring Requirements for the Brooks WWTP (AL0055204)

Effluent – Outfall 0011 to Chickasaw Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Dissolved Oxygen (DO)			Report, mg/L			Effluent	Grab	2 days per week	
pH			6.0 S.U.	9.0 S.U.		Effluent	Grab	2 days per week	
Total Suspended Solids	375 lb/day 30.0 mg/L	562 lb/day 45.0 mg/L				Effluent	24-hour Composite	2 days per week	
Total Suspended Solids	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	2 days per week	
Total Ammonia Nitrogen	250 lb/day 20.0 mg/L	375 lb/day 30.0 mg/L				Effluent	24-hour Composite	2 days per week	
Total Kjeldahl Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Nitrite + Nitrate Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	

Effluent – Outfall 0011 to Chickasaw Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Total Phosphorus	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Recoverable Copper	0.0235 mg/L			0.0235 mg/L		Effluent	Grab	1 day per month	
Flow through Treatment Plant	Report MGD			Report MGD		Effluent	Continuous	7 days per week	
Total Residual Chlorine	0.108 mg/L			0.08 mg/L		Effluent	Grab	2 days per week	
Enterococci	35 col/100 mL			158 col/100 mL		Effluent	Grab	2 days per week	May – Oct.
Enterococci	Report col/100 mL			275 col/100 mL		Effluent	Grab	2 days per week	Nov. – Apr.
$CBOD_5$	312 lb/day 25.0 mg/L	469 lb/day 37.5 mg/L				Effluent	24-hour Composite	2 days per week	

Effluent – Outfall 0011 to Chickasaw Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
$CBOD_5$	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	2 days per week	
$CBOD_5$ Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
TSS Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
Total Recoverable Mercury	Report, mg/L			Report, mg/L		Effluent	Grab	1 day per year	

Stormwater – Outfall 002S to Eight Mile Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
pH			Report S.U.	Report S.U.		Stormwater	Grab	1 day per quarter	
TSS				Report mg/L		Stormwater	Grab	1 day per quarter	
Oil & Grease				15 mg/L		Stormwater	Grab	1 day per quarter	

Stormwater – Outfall 002S to Eight Mile Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Total Ammonia Nitrogen				Report mg/L		Stormwater	Grab	1 day per quarter	
TKN				Report mg/L		Stormwater	Grab	1 day per quarter	
Total Nitrite + Nitrate Nitrogen				Report mg/L		Stormwater	Grab	1 day per quarter	
Total Phosphorus				Report mg/L		Stormwater	Grab	1 day per quarter	
Flow in Conduit				Report MGD		Stormwater	Calculated	1 day per quarter	
Enterococci				Report mg/L		Stormwater	Grab	1 day per quarter	
$CBOD_5$				Report mg/L		Stormwater	Grab	1 day per quarter	

µg/L = microgram(s) per liter
$CBOD_5$ = Carbonaceous 5-day Biochemical Oxygen Demand
col/100mL = colonies per 100 milliliters
mg/L = milligram(s) per liter
S.U. = standard units
TKN = total Kjeldahl nitrogen
TSS = total suspended solids

In addition to the requirements listed in Table A-1, PWWSB must also conduct an annual chronic whole effluent toxicity (WET) test using samples collected at Outfall 0011 and diluted to a concentration of 7% effluent. Other permit requirements include submission of an annual Municipal Water Pollution Prevention (MWPP) report that includes a description of sludge management/disposal practices, Discharge Information Zone (DIZ) study requirements at permit renewal, Sanitary Sewer Overflow Response Plan requirements, submission of priority pollutant scan test results with the permit renewal application, and Best Management Practices Plan requirements. These additional requirements are not likely to change when MAWSS becomes the owner/operator.

Morris WWTP

The Morris WWTP, located at 54 Grover Street in Prichard, Alabama (latitude 30.729775°, longitude -88.071855°), has a design treatment capacity of 4.0 MGD. The facility is regulated by ADEM under NPDES permit AL0023205 and discharges treated wastewater to Three Mile Creek, an impaired waterbody. The current NPDES permit for this facility was issued by ADEM in March 2005 and became effective on April 1, 2005. The permit was due to expire on March 31, 2010, but has been administratively extended.

In January 2007 the U.S. Environmental Protection Agency (EPA) approved a total maximum daily load (TMDL) to address water quality impairment in Three Mile Creek caused by organic enrichment and low dissolved oxygen (OE/DO). The TMDL includes a waste load allocation for the Morris WWTP that significantly reduces the allowable $CBOD_5$ and ammonia nitrogen in the effluent from the Morris WWTP. When ADEM reissues the NPDES permit for this facility, either to the PWWSB or to MAWSS, the facility will be required to achieve a monthly average $CBOD_5$ concentration of 2.03 mg/L and a monthly average ammonia nitrogen concentration of 0.22 mg/L during the months of May through November. During December through April the monthly average $CBOD_5$ and ammonia nitrogen effluent limits will be 1.62 mg/L and 0.18 mg/L, respectively.

The current monitoring and reporting requirements and effluent limitations for the Morris WWTP are summarized in Table A-2. The limitations, monitoring and reporting requirements, and other conditions in the permit are likely to be revised to become consistent with the requirements in the Three Mile Creek TMDL if the permit is reissued or transferred to MAWSS.

Table A-2. Discharge Limitations and Monitoring Requirements for the Morris WWTP (AL0023205)

Effluent – Outfall 001-2 to Three Mile Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Dissolved Oxygen (DO)			5.0, mg/L			Effluent	Grab	3 days per week	
pH			6.0 S.U.	9.0 S.U.		Effluent	Grab	3 days per week	
Total Suspended Solids	1000 lb/day 30.0 mg/L	1501 lb/day 45.0 mg/L				Effluent	24-hour Composite	3 days per week	
Total Suspended Solids	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	3 days per week	
Total Ammonia Nitrogen	166 lb/day 5.0 mg/L	250 lb/day 7.5 mg/L				Effluent	24-hour Composite	3 days per week	
Total Kjeldahl Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Nitrite + Nitrate Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Phosphorus	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	

Effluent – Outfall 001-2 to Three Mile Creek									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Total Recoverable Zinc	Report lb/day and mg/L	0.235 mg/L				Effluent	24-hour Composite	1 day per month	
Flow through Treatment Plant	Report MGD			Report MGD		Effluent	Continuous	7 days per week	
Total Residual Chlorine				0.05 mg/L		Effluent	Grab	3 days per week	
Enterococci	Report col/100 mL			500 col/100 mL		Effluent	Grab	3 days per week	
$CBOD_5$	500 lb/day 15.0 mg/L	750 lb/day 22.5 mg/L				Effluent	24-hour Composite	3 days per week	
$CBOD_5$	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	3 days per week	
$CBOD_5$ Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
TSS Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	

$CBOD_5$ = Carbonaceous 5-day Biochemical Oxygen Demand
col/100 mL = colonies per 100 milliliters
mg/L = milligram(s) per liter
S.U. = Standard Units

In addition to the requirements listed in Table A-2, PWWSB must also conduct an annual acute WET test using undiluted samples collected at Outfall 001-2. Other permit requirements include submission of an annual MWPP report that includes a description of sludge management/disposal practices, DIZ study requirements at permit renewal, Sanitary Sewer Overflow Response Plan requirements, priority pollutant scan test results with the submission of a permit renewal application, and Best Management Practices Plan requirements. These requirements would remain in effect if MAWSS takes ownership of the PWWSB treatment facilities and collection systems.

In September 2022 the PWWSB agreed to accept Consent Order (CO) 22-121-CWP from ADEM for alleged violations of the Alabama Water Pollution Control Act at the Morris WWTP and the Brooks WWTP, including the associated sewer collection systems (see Attachment 3). The alleged violations include multiple exceedances of effluent limitations, late submittal of Discharge Monitoring Reports (DMRs), late submittal of noncompliance reports, and numerous SSOs occurring between November 2019 and January 2022. The CO required the PWWSB to pay a stipulated penalty of $234,675, develop an SSO Response Plan, prepare an Engineering Report describing steps the PWWSB would take to resolve compliance issues at the PWWSB's two wastewater treatment facilities and the sanitary sewer collection system, submit quarterly progress reports to ADEM, and certify to ADEM by October 30, 2027, that the PWWSB has complied with all requirements of the CO.

The Engineering Report required by the CO was prepared by Strand Associates, Inc. and submitted to ADEM on December 5, 2022. As required by the CO, the report included recommendations for WWTP improvements, collection system improvements, and operation and maintenance (O&M) improvements, estimated probable costs to implement the recommended changes, and an implementation schedule.

However, the CO does not provide alternate effluent limitations or NPDES permit conditions to those included in the current NPDES permits for the two WWTPs. Therefore, the PWWSB continues to be subject to the effluent limitations specified in the NPDES permits.

If MAWSS and PWWSB agree to consolidate the wastewater operations and MAWSS decides to treat wastewater from the PWWSB collection system at the Smith WWTP, MAWSS would assume responsibility for collection and treatment of municipal wastewater within the PWWSB wastewater collection areas. This will likely include the construction of at least two wastewater pumping stations, one at the Brooks WWTP and one at the Morris WWTP, to transfer wastewater from the respective collection systems to an upgraded or new Wright Smith Jr. WWTP owned and operated by MAWSS.

The Smith WWTP has a current design treatment capacity of 12.8 MGD and discharges treated effluent to the Mobile River and stormwater to Three Mile Creek. The facility is regulated by ADEM under NPDES permit number AL0023094. The permit was issued by ADEM in November 2013 with an effective date of December 1, 2013. The permit expired on November 30, 2018, but has been administratively extended. The permit includes effluent limitations and other requirements for the discharge of treated effluent to Three Mile Creek and the Mobile River.

However, after the permit's issuance, MAWSS completed a wastewater outfall to the Mobile River and abandoned the discharge to Three Mile Creek.

MAWSS has received a draft NPDES permit for the Smith WWTP effluent discharge to the Mobile River and stormwater discharges to Toulmins Spring Branch and Three Mile Creek. MAWSS has 30 days from August 6, 2026, to provide comments to ADEM regarding the draft permit. The draft permit maintains the current discharge limits for TSS, $CBOD_5$, and ammonia nitrogen.

The current monitoring and reporting requirements and effluent limitations for the Smith WWTP are summarized in Table A-3. The limitations, monitoring and reporting requirements, and other conditions in the permit are likely to change if wastewater from the two PWWSB treatment facilities is pumped to the Smith WWTP.

Table A-3. Discharge Limitations and Monitoring Requirements for the Smith WWTP (AL0023094) – Mobile River

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
DO			3.0, mg/L			Effluent	Grab	5 days per week	May – Nov.
DO			5.0, mg/L			Effluent	Grab	5 days per week	Dec. – Apr.
pH			6.0 S.U.	9.0 S.U.		Effluent	Grab	5 days per week	
TSS	3,202 lb/day 30.0 mg/L	4,803 lb/day 45.0 mg/L				Effluent	24-hour Composite	5 days per week	
Total Suspended Solids	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
Total Ammonia Nitrogen	2,135 lb/day 20.0 mg/L	375 lb/day 30.0 mg/L				Effluent	24-hour Composite	2 days per week	
Total Kjeldahl Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Total Nitrite + Nitrate Nitrogen	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	

Effluent – Outfall 0041 to Mobile River									
Parameter	Discharge Limitations					Monitoring Requirements			
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Percent Removal	Sample Location	Sample Type	Measurement Frequency	Seasonal
Total Phosphorus	Report lb/day and mg/L	Report lb/day and mg/L				Effluent	24-hour Composite	1 day per month	
Flow through Treatment Plant	Report MGD			Report MGD		Effluent	Continuous	7 days per week	
Total Residual Chlorine	1.00 mg/L			1.00 mg/L		Effluent	Grab	5 days per week	
Enterococci	Report col/100mL			275 col/100 mL		Effluent	Grab	5 days per week	
$CBOD_5$	2,668 lb/day 25.0 mg/L	4,003 lb/day 37.5 mg/L				Effluent	24-hour Composite	5 days per week	
$CBOD_5$	Report lb/day and mg/L	Report lb/day and mg/L				Influent	24-hour Composite	5 days per week	
$CBOD_5$ Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
TSS Percent Removal					85%	Influent / Effluent	Calculated	1 day per month	
Total Recoverable Mercury	Report, µg/L			Report, µg/L		Effluent	Grab	1 day per quarter	

µg/L = microgram(s) per liter; $CBOD_5$ = Carbonaceous 5-day Biochemical Oxygen Demand; col/100mL = colonies per 100 milliliters; mg/L = milligram(s) per liter; S.U. = Standard Units

In addition to the requirements listed in Table A-3, MAWSS must also conduct an annual acute WET test using samples collected at Outfall 0041 diluted to a wastewater concentration of 19 percent. Other permit requirements include submission of an annual MWPP report that includes a description of sludge management / disposal practices, DIZ study requirements at permit renewal, Sanitary Sewer Overflow Response Plan requirements, submission of priority pollutant scan test results with the permit renewal application, and Best Management Practices Plan requirements. The dilution used in the WET test is likely to become more stringent (i.e., the wastewater concentration used in the test will increase) when MAWSS becomes the owner/operator of the Carlos Morris WWTP.

In October 2021 MAWSS agreed to a Settlement Agreement (SA) from the Alabama Attorney General and ADEM (CV-2020-9001226) to resolve alleged violations of the Alabama Water Pollution Control Act at the Smith WWTP and the Clifton C. Williams WWTP, including the associated sewer collection systems. The alleged violations include exceedances of effluent limitations and SSOs occurring between April 2015 and February 2022. The SA required MAWSS to pay a civil penalty of $954,000, develop an SSO Response Plan, prepare an Engineering Report describing steps MAWSS would take to resolve compliance issues at the two wastewater treatment facilities and the sanitary sewer collection system, and submit regular progress reports to ADEM. The SA will remain in place until MAWSS certifies that compliance with the provisions in the agreement has been achieved. Based on current progress, MAWSS anticipates completing all SA projects by December 31, 2026.

When the Brooks WWTP and the Morris WWTP are decommissioned, pumping wastewater from the PWWSB collection systems to the Smith WWTP for treatment will require an NPDES permit modification for the Smith WWTP and potentially treatment upgrades to treat the additional flow. Based on permitted capacities only, adding the treatment design capacities of the Brooks and the Morris WWTPs to the Smith WWTP results in a required treatment design capacity of 18.3 MGD. The increased treatment design capacity will result in a higher instream waste concentration (IWC) in the Mobile River and a more stringent WET test dilution.

In February 2024 ADEM completed an analysis of the Smith WWTP discharge to the Mobile River and included the flow from the Morris WWTP, giving a combined design flow of 16.8 MGD. This analysis offers important insight into how NPDES permit requirements at the Smith WWTP may change if MAWSS and PWWSB move forward with consolidation of the two systems and the PWWSB wastewater is treated at the Smith WWTP.

ADEM's analysis included an evaluation of impacts to DO in Mobile Bay as a result of the combined discharge from the Morris and Smith WWTPs. The evaluation was conducted by comparing predicted DO concentrations downstream of the Smith WWTP diffuser obtained using the Mobile Bay Model (Water Analysis Simulation Program [WASP]). The model was run with and without the combined wastewater discharge to determine the relative impact of the discharge on DO concentrations in Mobile Bay. Effluent concentrations for $CBOD_5$, ammonia nitrogen, and DO were assumed to be the same as the limitations in the current NPDES permit: 25 mg/L, 20 mg/L, and 3 mg/L, respectively. Comparing predicted DO concentrations from the two model runs

revealed only minor differences, and low DO concentrations in the Mobile River and Mobile Bay are mostly due to non-point source nutrient loads and natural conditions.

Based on ADEM's modeling, it is reasonable to conclude that NPDES permit limitations for $CBOD_5$ and ammonia nitrogen for an expanded discharge (18.3 MGD) from the Smith WWTP would not be significantly different from those in the facility's current NPDES permit. If ADEM chooses to keep the loading of these parameters the same as that used in the 2024 water quality model to maintain the impact to DO concentrations at current levels, then $CBOD_5$ and ammonia nitrogen concentrations would change to 23 mg/L and 18 mg/L, respectively.

As a part of their 2024 evaluation of the combined Morris WWTP and Smith WWTP discharge to the Mobile River, ADEM used the Cornell Mixing Zone Model (CORMIX) to estimate how the IWC would change as a result of the increased discharge flow. The CORMIX model assumed tidal conditions and stratification at the discharge location and estimated an IWC of 12.3%. It should be noted that the NPDES permit for the Smith WWTP assumes an IWC of 19% for toxicity testing purposes. The 19% IWC was likely obtained using an older version of the CORMIX model and different river conditions. At the increased discharge rate of 18.3 MGD, the IWC is likely to increase slightly from ADEM's 2024 estimate of 12.3%. While the IWC is not directly proportional to discharge flow, assuming that it is for the purpose of this evaluation provides an IWC estimate of 13.4% at the new design capacity of 18.3 MGD.

Construction of pipelines, force mains, and pump stations may require Clean Water Act Section 404 permitting by the Mobile District of the U.S. Army Corps of Engineers (USACE) where construction activities occur in or near jurisdictional waters. If USACE permitting is required, then coordination with Alabama's Coastal Area Management Program may also be necessary.

To implement these changes, the steps described below will be necessary to satisfy state and federal regulatory requirements. Since a final design for construction is not yet available, the regulatory requirements of the final project may differ from those listed.

- During pipeline route and pumping station location selection, identify jurisdictional wetlands and endangered or threatened species within the potential routes.
- Following final route selection and pumping station construction locations, verify potential impacts to jurisdictional wetlands and endangered species and apply for appropriate permits from USACE. For example, USACE Nationwide Permit #58 provides coverage for Utility Line Activities for Water and Other Substances. USACE Nationwide Permit #59 provides coverage for Water Reclamation and Reuse Facilities.
- At least 30 days prior to beginning pumping station or pipeline construction activities and following receipt of the appropriate USACE permit(s), submit an application (Notice of Intent) to ADEM for a Construction Stormwater General Permit (ALR100000). Included in this step is the preparation of a Construction Best Management Practices Plan (CBMPP). There are no ADEM Priority Watersheds within the Prichard area, so the CBMPP will not have to be approved by ADEM but must be updated and implemented as construction activities progress.
- When a final design treatment capacity for the Smith WWTP has been determined, request a revised Waste Load Allocation (WLA) and Mixing Zone Analysis (MZ) from ADEM's Water

Quality Branch. This step will establish the effluent limits that the new/upgraded treatment facility will be required to meet when the new/expanded wastewater treatment facility is completed and permitted.

- At least 180 days prior to the decommissioning of either of the PWWSB wastewater treatment facilities (i.e., wastewater pumping from PWWSB to the Smith WWTP begins), submit an NPDES permit modification request/application to ADEM for the Smith WWTP. The application should include the new Smith WWTP design treatment capacity and plan drawings showing new or upgraded treatment units to accommodate the expanded wastewater volume and comply with the revised effluent limitations.
- At least 30 days prior to beginning construction activities at the Smith WWTP, submit a Notice of Intent or permit modification request to ADEM for a Construction Stormwater General Permit (ALR100000).
- Following completion of all construction activities, submit a Termination Request for all Construction Stormwater General Permits.

Attachment 3
ADEM Consent Order 22-121-CWP

LANCE R. LEFLEUR
DIRECTOR

KAY IVEY
GOVERNOR

Alabama Department of Environmental Management
adem.alabama.gov
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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,

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

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Decatur Branch
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Mobile-Coastal
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LANCE R. LEFLEUR
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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:

Period of Noncompliance	Penalty per Day per Violation
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

By: Russell J Heidelberg
Its: Chairperson
Date: 6/16/2022

ALABAMA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

EXECUTED AND ISSUED:

By: Marilyn Elliott
Its: Deputy Director
Date: 9-12-2022

Attachment 1
Carlos Morris WWTP Permit Effluent Limitation Violations

Monitoring Period	Outfall	Parameter	Limit	Reported Value	Unit	Violation Type
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

Monitoring Period	Report Frequency	Outfall	Due Date	Received Date	Days Late
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

Monitoring Period	Outfall	Noncompliance Notification Report Due Date	Noncompliance Notification Report Received Date	Days Late
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

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

Monitoring Period	Outfall	Parameter	Limit	Reported Value	Unit	Violation Type
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

Monitoring Period	Report Frequency	Outfall	Due Date	Received Date	Days Late
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

Monitoring Period	Outfall	Noncompliance Notification Report Due Date	Noncompliance Notification Report Received Date	Days Late
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

SSO Begin Date/Time	SSO Stop Date/Time	SSO Location	SSO Volume (gallons)
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) Seriousness of Violation*	(B) Standard of Care*	(C) 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