

force main replacement project would eliminate the liability from the city's system (Attachment D); and

WHEREAS, on November 1, 2016, a modification of NPDES permit No. GA0020222 for the Respondent's Mud Creek WPCP went into effect, containing a higher monitoring frequency for total phosphorus than the previous permit; and

WHEREAS, from December 2, 2018 to December 15, 2018, the collection system for the Withlacoochee WPCP was inundated with flow due to heavy rains and severe weather, and the Respondent reported numerous unpermitted discharges from its sanitary sewer collection system to waters of the State as a result of the wet weather, totaling over 2,255,000 gallons (Attachment A.1); and

WHEREAS, from December 2, 2018 to December 17, 2018, the Withlacoochee WPCP was inundated with flow due to heavy rains and severe weather, and the Respondent reported an estimated total 21,814,000 gallons of raw sewage and rainwater discharged to the Withlacoochee River from the Withlacoochee WPCP's equalization basin as a result of the wet weather (Attachment A.2); and

WHEREAS, the Respondent had previously established a stream quality monitoring program at the state line between Georgia and Florida, independent of permit or state requirements, and has since reduced the frequency of their program from once per week to once per quarter due to financial constraints, and several requests have been submitted by entities in Florida and Georgia for the Respondent to increase their sampling frequency; and

WHEREAS, several requests have been submitted by entities in Florida to receive timely notifications of spills from the Respondent's systems which cross or have the potential to cross state borders; and