



CITY OF VALDOSTA, GEORGIA
Utilities Department

EPD/WPCP WCP

MAY 20 2014

RECEIVED

Henry Hicks
DIRECTOR OF UTILITIES

May 19, 2014

Mr. Lewis Hays
Program Manager
Watershed Compliance
Georgia Environmental Protection Division
4220 International Parkway, Suite 101
Atlanta, Georgia, 30354

RE: Notice of Violation – NPDES Permit Nos. GA0033235 & GA0020222 (Consent Order No. EPD-WQ-5478)

On December 3, 2013, the city of Valdosta and the Georgia EPD entered into a Consent Order that outlines the solutions for the majority of the issues in this Notice of Violation. This response and accompanying information will show the city has completed short term improvements to the Withlacoochee WPCP and since they were completed, protocols implemented, and staff trained, there have been no major permit violations and no spills or overflows at the plant. In addition, the city has awarded a contract for over \$32 million dollars for the Force Main project, with a schedule for completion in December of next year, six months ahead of the C.O. timeline. The next phase of the manhole replacement project will be awarded in June of this year, resolving several other violations in this notice. These three projects cover the violations identified in the NOV, with the exception of two emergencies, and we hope the city's demonstrated commitment by evidence of work completed, contracts awarded and contracts pending will support the city's actions to date to address and resolve these important issues. In addition, the city is ahead of schedule on plans for the relocation of the Withlacoochee WPCP and could finish the project nearly eighteen months ahead of the C.O. schedule. We have completed Phase 1 of the smoke testing program and have identified needed repairs and have those budgeted in upcoming budgets. These actions will resolve the violations noted in this NOV.

The major causes contributing to the violations were excessive and consecutive very heavy rain events which led to extremely high groundwater tables, river and localized flooding resulting in extensive inflow and infiltration (I&I) into the sanitary sewer system as well as the main influent 54-inch gravity sewer to the Withlacoochee WPCP. As a result of river flooding and subsequent inflow into this 54-inch gravity main, influent flows to the Withlacoochee WPCP from the sanitary sewer collection system were severely restricted causing sewer system backups and numerous manholes to overflow in low lying areas of the city. In a few instances, some overflows were attributed to sewer main failure resulting from severely corroded section of pipe. The 54 inch gravity main is scheduled to be replaced by the Force Main project, thus eliminating this liability from the city's system.

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