



CITY OF VALDOSTA, GEORGIA
Utilities Department

W. Darryl Muse
DIRECTOR OF UTILITIES

March 19, 2019

Mr. Lewis Hays
Watershed Compliance Program, Municipal Compliance Unit
GA Environmental Protection Division, Watershed Protection Branch
Suite 1152, 2 MLK, Jr. Drive S.E.
Atlanta, Georgia 30334

RE: Notice of Violation: Permits No. GA0033235 & GA0020222

Mr. Hays:

The City of Valdosta Utilities Department is providing the following information per the Notice of Violation letter dated February 19, 2019.

1. Explanation of the causes of the spills and violations:

From December 2nd to December 15th 2018, the City of Valdosta and surrounding areas received a combined total of 15 inches of rain during several storm events. Included in that total is 3 to 4 inches of rain that Valdosta received over a two-day period. While the WWTP has a normal average daily flow of 3.5 million gallons (MG), the influent flow peaked at more than 22 MG—nearly seven times the normal rate.

As a result of those rainfall totals into the city, the collection system and treatment plants were overwhelmed. The Withlacoochee Plant has four processing units, although during normal operations the system only requires one. During this storm event, the plant was running all four units plus the excess flow equalization basin.

Given that most spills identified in Attachments A and B were caused by wet weather inflow and infiltration (I&I), it is the City's top priority to address those I&I issues through multiple ongoing sewer system rehabilitation and upgrade programs.

2. Unfinished rehabilitation projects that will impact the causes of the spills and violations:

In addition to a comprehensive Fats, Oils, and Grease (FOG) Program, the city currently has three major recurring programs underway to address overflows and spills; the Manhole Rehabilitation Program, Cured-In-Place Pipe (CIPP) Lining Program, and the Sewer Main Upgrade Program.

P.O. Box 1125 ■ 1016 Myrtle Street
Valdosta, Georgia 31603-1125



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