



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

DEC 05 2017

Ms. Kishia L. Powell, Commissioner
City of Atlanta Department of Watershed Management
72 Marietta Street NW
Atlanta, GA 30303

RE: Notice of Violation
City of Atlanta Water Reclamation Centers,
East Area & West Area Combined Sewer Systems
NPDES Permit Nos. GA0039012, GA0037168,
and GA0038644

Dear Ms. Powell:

This letter serves as a Notice of Violation (NOV) of the Georgia Rules and Regulations for Water Quality Control, Title 12, Chapter 5 of the Georgia Water Quality Control Act; and National Pollutant Discharge Elimination System (NPDES) Permits No. GA0039012, GA0037168, and GA0038644.

From September 1, 2015 to September 30, 2017 the City reported multiple noncompliance issues to the Environmental Protection Division (EPD), including unpermitted discharges, effluent permit limit exceedances, major spills, and other noncompliance issues, as detailed in Attachments A, B, C, D, and E of this NOV. The City has submitted any necessary follow-up data required or requested by EPD.

EPD is planning to propose a consent order to address these alleged violations. If you have any questions regarding the forthcoming proposed consent order or any of the noncompliance issues listed in Attachments A, B, C, D, and E please contact Alys Hannum, of my staff, within ten days after receipt of this letter, at alys.hannum@dnr.ga.gov or by phone at 404-463-1474. Your cooperation in this matter is appreciated.

Sincerely,

Lewis Hays, Program Manager
Watershed Compliance Program

LH/akh
Attachments

GEORGIA ENVIRONMENTAL PROTECTION DIVISION
WATERSHED COMPLIANCE PROGRAM
2 MLK, JR. DR. S.E., SUITE 1152
ATLANTA, GEORGIA 30334

City of Atlanta

ATTACHMENT A

Sanitary Sewer System Spills
September 1, 2015 to September 30, 2017

ATTACHMENT A

City of Atlanta

Sanitary Sewer System Spills (>30,000 gallons)

September 1, 2015 to September 30, 2017

Citation: Rule 391-3-6.03(5)(a-c)

OCGA: 12-5-29(a)

Date	Permit Number	Location	Volume (Gallons)	Cause	Receiving Waterway
2015-09-11	GA0039012	Intranchment Creek WRC	442,000	Wet weather	Intranchment Creek
2015-10-22	GA0039012	2717 Hedgewood Drive, NW	58,650	Debris	Sandy Creek
2015-11-02	GA0039012	633-780 Wesley Drive	3,256,509	Wet weather	Peachtree Creek
2015-11-02	GA0039012	Intranchment Creek WRC	1,010,000	Wet weather	Intranchment Creek
2015-11-07	GA0039012	Intranchment Creek WRC	1,050,000	Wet weather	Intranchment Creek
2015-12-17	GA0039012	Intranchment Creek WRC	831,000	Wet weather	Intranchment Creek
2015-12-24	GA0039012	2334 Adams Drive, NW	112,000	Wet weather	Peachtree Creek
2015-12-24	GA0039012	2487 Howell Mill Road, NW	60,800	Wet weather	Peachtree Creek
2015-12-24	GA0039012	2851 Ridgewood Circle, NW	360,000	Pipe failure	Nancy Creek
2015-12-24	GA0039012	644 Wesley Drive, NW	61,600	Wet weather	Peachtree Creek
2015-12-24	GA0039012	Intranchment Creek WRC	4,385,000	Wet weather	Intranchment Creek

ATTACHMENT A

City of Atlanta

Sanitary Sewer System Spills (>30,000 gallons)

September 1, 2015 to September 30, 2017

Citation: Rule 391-3-6.03(5)(a-c)

OCGA: 12-5-29(a)

Date	Permit Number	Location	Volume (Gallons)	Cause	Receiving Waterway
2015-12-24	GA0039012	Intranchment Creek WRC	9,020,000	Wet weather	Intranchment Creek
2015-12-25	GA0039012	Intranchment Creek WRC	7,574,000	Wet weather	Intranchment Creek
2015-12-26	GA0039012	Intranchment Creek WRC	2,886,000	Wet weather	Intranchment Creek
2015-12-28	GA0039012	1320 Regency Center Drive	227,250	Pipe failure	Utoy Creek
2015-12-28	GA0039012	Intranchment Creek WRC	1,376,000	Wet weather	Intranchment Creek
2015-12-29	GA0039012	225 Huntington Road, NE	78,500	Pipe failure	Peachtree Creek
2016-01-03	GA0039012	Intranchment Creek WRC	4,154,000	Wet weather	Intranchment Creek
2016-01-06	GA0039012	Intranchment Creek WRC	750,735	Wet weather	Intranchment Creek
2016-01-13	GA0039012	650 Thomasville Blvd, SE	33,900	Grease	South River
2016-01-15	GA0039012	Intranchment Creek WRC	1,510,000	Wet weather	Intranchment Creek
2016-01-22	GA0039012	Intranchment Creek WRC	154,000	Wet weather	Intranchment Creek

ATTACHMENT A

City of Atlanta

Sanitary Sewer System Spills (>30,000 gallons)

September 1, 2015 to September 30, 2017

Citation: Rule 391-3-6.03(5)(a-c)

OCGA: 12-5-29(a)

Date	Permit Number	Location	Volume (Gallons)	Cause	Receiving Waterway
2016-02-03	GA0039012	Intrinchment Creek WRC	2,635,000	Wet weather	Intrinchment Creek
2016-02-15	GA0039012	Intrinchment Creek WRC	38,988	Wet weather	Intrinchment Creek
2016-02-24	GA0039012	Intrinchment Creek WRC	35,904	Wet weather	Intrinchment Creek
2016-10-28	GA0039012	924 Woods St. NW	744,500	Pipe failure	Proctor Creek
2017-02-09	GA0039012	1841 Wells Dr. SW	346,500	Pipe failure	Utoy Creek
2017-03-22	GA0039012	850 Lake Mirror Rd. SW	266,382	Pipe failure	Flint River
2017-04-05	GA0039012	1380 Battleview Dr. NW	46,000	Wet weather	Peachtree Creek
2017-04-05	GA0039012	644 Wesley Dr. NW	149,128	Wet weather	Peachtree Creek
2017-06-20	GA0039012	424 Lindbergh Dr. NE	110,100	Wet weather	Peachtree Creek
2017-06-20	GA0039012	644 Wesley Dr. NW	255,300	Wet weather	Peachtree Creek

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ATTACHMENT B

Outfall Spills

September 1, 2015 to September 30, 2017

ATTACHMENT B

City of Atlanta

Major Outfall Spills

September 1, 2015 to September 30, 2017

Citation: Rule 391-3-6.03(5)(a-c)

OCGA: 12-5-29(a)

Date	Permit Number	Location	Cause	Receiving Waterway	Violation	Permit Limit	Reported Daily Value
2015-09-25	GA0039012	R.M. Clayton WRC	Unknown	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	37 mg/L
2015-11-02	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	405 mg/L
2015-11-02	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Biochemical Oxygen Demand Exceedance	25 mg/L	45 mg/L
2015-11-07	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	35 mg/L
2015-11-09	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	150 mg/L
2015-12-24	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	393 mg/L
2015-12-24	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	39 mg/L
2016-01-15	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	290 mg/L
2016-01-23	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	85 mg/L
2016-01-24	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	59 mg/L
2016-02-23	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	110 mg/L
2016-02-23	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Biochemical Oxygen Demand Exceedance	25 mg/L	32 mg/L
2016-02-24	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	188 mg/L
2015-12-25	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	50 mg/L

ATTACHMENT B

City of Atlanta

Major Outfall Spills

September 1, 2015 to September 30, 2017

Citation: Rule 391-3-6.03(5)(a-c)

OCGA: 12-5-29(a)

Date	Permit Number	Location	Cause	Receiving Waterway	Violation	Permit Limit	Reported Daily Value
2016-02-25	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	32 mg/L
2016-02-25	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	30 mg/L
2017-04-05	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	314 mg/L
2017-06-20 & 2017-06-21	GA0039012	R.M. Clayton WRC	Hydraulic Overload	Chattahoochee River	Major Outfall Spill From Total Suspended Solids Exceedance	15 mg/L	119 & 38 mg/L

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ATTACHMENT C
City of Atlanta Fish Kill Report
December 16, 2015



Kasim Reed
MAYOR

CITY OF ATLANTA
DEPARTMENT OF WATERSHED MANAGEMENT
72 MARIETTA STREET NW
ATLANTA, GEORGIA 30303

Jo Ann J. Macrina, PE
COMMISSIONER

Via US Mail and Electronic Delivery

January 20, 2016

Ms. Kim Hembree
GA Department of Natural Resources
Environmental Protection Division
2 Martin Luther King Jr. Dr. SW
Suite 1152
Atlanta, GA 30334

EPD/WPB/JWRP

JAN 20 11

RECEIVED

Subject: Notice Concerning Endangering Waters of the State
Total Residual Chlorine Exceedence with Fish Kill - Revised
Five-day Report – December 16, 2015
Custer Avenue Combined Sewage Control Facility

Dear Ms. Hembree:

Below please find the information required by OCGA Section 391-3-.05(3)(a) for the above referenced incident that was reported to the Georgia Department of Natural Resources Environmental Protection Division (EPD) and the National Spill Response Center on December 16, 2015.

- GEMA Incident Number (if applicable): 87538 78548
- National Spill Response Center Incident Number: 1136056
- Date of the Incident: December 16, 2015
- Location: Custer Avenue Combined Sewage Control Facility (CSCF)
780 Custer Avenue SE
Atlanta, Georgia 30315
- Cause: The Custer Avenue CSCF was operating to treat combined sanitary wastewater and stormwater from the East Area Combined Sewer System. The treatment system was actively disinfecting and dechlorinating the flow. In addition, screening was being performed, as required by the NPDES permit. During the discharge event there was a break in the rainfall that was sufficient to reduce the influent flow to the facility and the dechlorination pump went into automatic shut-down mode due to a low pressure alarm (i.e., representing low flow conditions). However, a second wave of heavy rainfall occurred during the automatic pump shut-down process. The disinfection pump was able to restart and initiate the disinfection process, but the dechlorination pump was still in automatic shut-down mode and could not be restarted in time to dechlorinate the disinfected wastewater. As a result, there was an exceedence of the total residual chlorine (TRC) permitted effluent limit.

Based on DWM records, the following effluent data indicate that the exceedence occurred for a maximum period of up to 40 minutes:

Time	Chlorine Concentration (mg/L)	
	Pre Dechlorination	Post Dechlorination
10:20 AM	7.1 mg/L	0.03 mg/L
11:00 AM	> 8.8 mg/L	> 8.8 mg/L
The tunnel gate to the East Area WQCF was reopened at 11:00 AM ending the discharge via the Custer Creek CRCF outfall.		

At the time the high TRC reading was made, the water level in the tunnel that transmits flow to the East Area WQCF had fallen to a level that allowed the diversion gates to be reopened and to direct flow to the East Area WQCF instead of through the Custer Avenue CSCF outfall. Gates were opened by 11:00 AM and the final post dechlorination effluent sample was collected.

At approximately 12:00 PM, while operators were working to get the dechlorination system pump back online, the facility operator noticed three dead fish near the Custer Avenue outfall. As a chemical release, both the Georgia Emergency Management Agency and the National Spill Response Center were notified of a possible fish kill incident related to the release of sodium hypochlorite.

Department of Watershed deployed three field teams to assess the in-stream situation:

- An Operations team to monitor instream chlorine levels;
- An Ecology team to investigate the extent of the fish kill; and
- A Sampling team to assist the Operations Team.

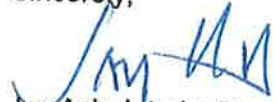
Based on the results of the post incident investigations, no other dead fish were found downstream of the facility and it appears that the extent of the fish kill was localized to the immediate vicinity of the Custer Avenue CSCF outfall.

- **Estimated Volume Discharged:** Up to a maximum potential of 139,000 gallons. *Note: This estimate is based on a worst-case assumption that the maximum recorded instantaneous influent flow rate of 5 MGD was representative of the full 40 minute interval and that the pump failure occurred immediately after the last compliant TRC sample was collected.*
- **Receiving Stream:** Intrenchment Creek
- **Corrective Action Taken:** At the time that the elevated TRC levels were discovered, plant personnel evaluated the system capacity and determined that the water level in the East Area tunnel had fallen sufficiently to permit reopening of the tunnel diversion gate. The event ended after the East Area tunnel gate was reopened and flow from the Custer Avenue CSCF ceased.

TRC Exceedence – December 16, 2015
Custer Avenue CSCF
January 20, 2016
Page 2 of 2

Please call me (404-546-1413) or Kristina Garcia of my staff (404-546-1255) if you have questions regarding this submittal or if you need additional information.

Sincerely,



Jay Ash, Interim Deputy Commissioner
Office of Watershed Protection

cc: Richard T. Parker, Interim Deputy Commissioner/DWM-OWTR
Alan Stillwell, WRC Plant Manager/DWM-OWTR
Kristina Garcia, Environmental Compliance Manager/DWM-OWP

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City of Atlanta

ATTACHMENT D

Permit Effluent Limitation Violations
September 1, 2015 to September 30, 2017

ATTACHMENT D

City of Atlanta

Effluent Permit Limitation Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

Date of Violation	NPDES Permit Number	Facility	Parameter	Permit Limit	Reported Value	Citation
2015-10-04	GA0038644	West Area WQCF	Total Residual Chlorine Daily Maximum	0.10 mg/L	0.46 mg/L	NPDES Permit: Part I.B.1 Consent Decree: Section XI.D.4
2015-11-02	GA0038644	Tanyard Creek CSCF	Fecal Coliform Daily Maximum Geometric Mean	4,000/100 mL	60000/100 mL	NPDES Permit: Part I.B.4 Consent Decree: Section XI.D.2
2015-11-07	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	2,050 kg/d	NPDES Permit: Part I.B.4
2015-11-07	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	3.34 mg/L	NPDES Permit: Part I.B.1
2015-11-07	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4,739 kg/d	39,713 kg/d	NPDES Permit: Part I.B.1
2015-11-07	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	66 mg/L	NPDES Permit: Part I.B.1
2015-11-07	GA0038644	Tanyard Creek CSCF	Fecal Coliform Daily Maximum Geometric Mean	4,000/100 mL	5,600/100 mL	NPDES Permit: Part I.B.4 Consent Decree: Section XI.D.2
2015-11-14	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	1,005 kg/d	NPDES Permit: Part I.B.4
2015-11-14	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.58 mg/L	NPDES Permit: Part I.B.1
2015-11-14	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4,739 kg/d	15,465 kg/d	NPDES Permit: Part I.B.1
2015-11-14	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	26 mg/L	NPDES Permit: Part I.B.1
2015-11-21	GA0039012	South River WRC	Fecal Coliform Weekly Maximum Geometric Mean	400/100 mL	431/100 mL	NPDES Permit: Part I.B.2
2015-11-30	GA0039012	Combined WRC Limits	Biochemical Oxygen Demand Weekly Maximum Loading	3463 kg/d	5686 kg/d	NPDES Permit: Part I.B.4
2015-11-30	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	757 kg/d	NPDES Permit: Part I.B.4

ATTACHMENT D

City of Atlanta

Effluent Permit Limitation Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

2015-11-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.50 mg/l/L	1.21 mg/L	NPDES Permit: Part I.B.1
2015-11-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Loading	3,790 kg/d	13,063 kg/d	NPDES Permit: Part I.B.1
2015-11-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Concentration	10.0 mg/L	22.1 mg/L	NPDES Permit: Part I.B.1
2015-12-05	GA0039012	South River WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.00 mg/L	NPDES Permit: Part I.B.2
2015-12-17	GA0037168	Custer Avenue CSCF	Total Residual Chlorine Daily Maximum	0.10 mg/L	8.8 mg/L	NPDES Permit: Part I.B.1 Consent Decree: Section XI.D.4
2015-12-17	GA0038644	Clear Creek CSCF	Fecal Coliform Daily Maximum Geometric Mean	4,000/100 mL	60,000/100 mL	NPDES Permit: Part I.B.2 Consent Decree: Section XI.D.2
2015-12-26	GA0039012	Combined WRC Limits	Biochemical Oxygen Demand Weekly Maximum Loading	3,913 kg/d	5,529 kg/d	NPDES Permit: Part I.B.4
2015-12-26	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	1,822 kg/d	NPDES Permit: Part I.B.4
2015-12-26	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	2.84 mg/L	NPDES Permit: Part I.B.1
2015-12-26	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4,739 kg/d	41,167 kg/d	NPDES Permit: Part I.B.1
2015-12-26	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	65 mg/L	NPDES Permit: Part I.B.1
2015-12-31	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Loading	3790 kg/d	9,821 kg/d	NPDES Permit: Part I.B.1
2015-12-31	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Concentration	10.0 mg/L	16.0 mg/L	NPDES Permit: Part I.B.1
2015-12-31	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	571 kg/d	NPDES Permit: Part I.B.4
2015-12-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.50 mg/L	0.94 mg/L	NPDES Permit: Part I.B.1

ATTACHMENT D

City of Atlanta

Effluent Permit Limitation Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

2016-01-02	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	0.93 mg/L	NPDES Permit: Part I.B.1
2016-01-15	GA0038644	Clear Creek CSCF	Fecal Coliform Daily Maximum	4,000/100 mL	48,000/100 mL	NPDES Permit: Part I.B.2
2016-01-15	GA0037168	Custer Avenue CSCF	Fecal Coliform Daily Maximum	4,000/100 mL	60,000/100 mL	Consent Decree: Section XI.D.2
2016-01-16	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	887 kg/d	NPDES Permit: Part I.B.2
2016-01-16	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.90 mg/L	Consent Decree: Section XI.D.2
2016-01-16	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4,739 kg/d	18588 kg/d	NPDES Permit: Part I.B.4
2016-01-16	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	40.4 mg/L	NPDES Permit: Part I.B.1
2016-01-23	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	523 kg/d	NPDES Permit: Part I.B.1
2016-01-23	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.02 mg/L	NPDES Permit: Part I.B.4
2016-01-23	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4,739 kg/d	10856 kg/d	NPDES Permit: Part I.B.1
2016-01-23	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	21 mg/L	NPDES Permit: Part I.B.1
2016-01-31	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	370 kg/d	NPDES Permit: Part I.B.1
2016-01-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.50 mg/L	0.78 mg/L	NPDES Permit: Part I.B.4
2016-01-31	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Loading	3790 kg/d	6936 kg/d	NPDES Permit: Part I.B.1
2016-01-31	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Concentration	10.0 mg/L	14.8 mg/L	NPDES Permit: Part I.B.1

ATTACHMENT D

City of Atlanta

Effluent Permit Limitation Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

2016-02-27	GA0039012	Combined WRC Limits	Carbonaceous Biochemical Oxygen Demand Weekly Maximum Loading	3,913 kg/d	4,850 kg/d	NPDES Permit: Part I.B.4
2016-02-27	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	1,303 kg/d	NPDES Permit: Part I.B.4
2016-02-27	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	2.31 mg/L	NPDES Permit: Part I.B.1
2016-02-27	GA0039012	R.M. Clayton WRC	Chemical Oxygen Demand Weekly Maximum Loading	21,324 kg/d	26,857 kg/d	NPDES Permit: Part I.B.1
2016-02-29	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	48 mg/L	NPDES Permit: Part I.B.1
2016-02-29	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4,739 kg/d	25,010 kg/d	NPDES Permit: Part I.B.2
2016-02-29	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	394 kg/d	NPDES Permit: Part I.B.4
2016-02-29	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.50 mg/L	0.71 mg/L	NPDES Permit: Part I.B.1
2016-02-29	GA0039012	R.M. Clayton WRC	Chemical Oxygen Demand Monthly Average Loading	17,059 kg/d	20,011 kg/d	NPDES Permit: Part I.B.1
2016-02-29	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Loading	3,790 kg/d	6,971 kg/d	NPDES Permit: Part I.B.1
2016-02-29	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Concentration	10.0 mg/L	14 mg/L	NPDES Permit: Part I.B.1
2016-02-29	GA0039012	South River WRC	Fecal Coliform Weekly Maximum Geometric Mean	400/100 mL	535/100 mL	NPDES Permit: Part I.B.2
2016-04-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	0.77 mg/L	NPDES Permit: Part I.B.1
2016-05-17	GA0037168	East Area WQCF	Fecal Coliform Daily Maximum Geometric Mean	2000/100 mL	9000/100 mL	NPDES Permit: Part I.B.2 Consent Decree: Section XI.D.2
2016-05-21	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	334 mg/L	NPDES Permit: Part I.B.4

ATTACHMENT D

City of Atlanta

Effluent Permit Limitation Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

2016-05-21	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	0.99 mg/L	NPDES Permit: Part I.B.1
2016-06-25	GA0039012	R.M. Clayton WRC	Fecal Coliform Weekly Maximum Geometric Mean	400/100 mL	1147/100 mL	NPDES Permit: Part I.B.2
2016-09-03	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	0.78 mg/L	NPDES Permit: Part I.B.1
2017-02-25	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	345 kg/d	NPDES Permit: Part I.B.4
2017-02-25	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.26 mg/L	NPDES Permit: Part I.B.1
2017-02-25	GA0039013	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	0.65 mg/L	NPDES Permit: Part I.B.1
2017-03-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	0.97 mg/L	NPDES Permit: Part I.B.1
2017-04-05	GA0037168	Custer Avenue CSCF	Fecal Coliform Daily Maximum Geometric Mean	4000/100 mL	105000/100 mL	NPDES Permit: Part I.B.2 Consent Decree: Section XI.D.2
2017-04-30	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	1694 kg/d	NPDES Permit: Part I.B.4
2017-04-30	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	538 kg/d	NPDES Permit: Part I.B.4
2017-04-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4739 kg/d	40076 kg/d	NPDES Permit: Part I.B.1
2017-04-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	84.7 mg/L	NPDES Permit: Part I.B.1
2017-04-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Loading	3790 kg/d	9698 kg/D	NPDES Permit: Part I.B.1
2017-04-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Monthly Average Concentration	10.0 mg/L	21.1 mg/L	NPDES Permit: Part I.B.1
2017-04-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	3.49 mg/L	NPDES Permit: Part I.B.1

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September 1, 2015 to September 30, 2017

2017-04-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	1.16 mg/L	NPDES Permit: Part I.B.1
2017-05-31	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	303 kg/d	NPDES Permit: Part I.B.4
2017-05-31	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	2.14 kg/d	237 kg/d	NPDES Permit: Part I.B.4
2017-05-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	0.83 mg/L	NPDES Permit: Part I.B.1
2017-05-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	0.68 mg/L	NPDES Permit: Part I.B.1
2017-05-31	GA0039012	South River WRC	Dissolved Oxygen Daily Minimum	6.0 mg/L	4.9 mg/L	NPDES Permit: Part I.B.2
2017-06-20	GA0038644	Tanyard Creek CSCF	Fecal Coliform Daily Maximum Geometric Mean	2000/100 mL	33000/100 mL	NPDES Permit: Part I.B.4 Consent Decree: Section XI.D.2
2017-06-30	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	538 kg/d	NPDES Permit: Part I.B.4
2017-06-30	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	307 kg/d	NPDES Permit: Part I.B.4
2017-06-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Loading	4739 kg/d	10149 kg/d	NPDES Permit: Part I.B.1
2017-06-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Maximum Concentration	15.0 mg/L	23.3 mg/L	NPDES Permit: Part I.B.1
2017-06-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.22 mg/L	NPDES Permit: Part I.B.1
2017-06-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	0.79 mg/L	NPDES Permit: Part I.B.1
2017-07-31	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	414 kg/d	NPDES Permit: Part I.B.4
2017-07-31	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Loading	214 kg/d	275 kg/d	NPDES Permit: Part I.B.4

ATTACHMENT D

City of Atlanta

Effluent Permit Limitation Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

2017-07-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.29 mg/L	NPDES Permit: Part I.B.1
2017-07-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	0.8 mg/L	NPDES Permit: Part I.B.1
2017-08-31	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	450 kg/d	NPDES Permit: Part I.B.4
2017-08-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.26 mg/L	NPDES Permit: Part I.B.1
2017-08-31	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	0.61 mg/L	NPDES Permit: Part I.B.1
2017-09-30	GA0038644	Clear Creek CSCF	Fecal Coliform Daily Maximum Geometric Mean	2,000/100 mL	5,000/100 mL	NPDES Permit: Part I.B.2 Consent Decree: Section XI.D.2
2017-09-30	GA0039012	Combined WRC Limits	Total Phosphorus Weekly Maximum Loading	268 kg/d	582 kg/d	NPDES Permit: Part I.B.1
2017-09-30	GA0039012	Combined WRC Limits	Total Phosphorus Monthly Average Concentration	214 kg/d	233 kg/d	NPDES Permit: Part I.B.1
2017-09-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Weekly Maximum Concentration	0.75 mg/L	1.4 mg/L	NPDES Permit: Part I.B.4
2017-09-30	GA0039012	R.M. Clayton WRC	Total Phosphorus Monthly Average Concentration	0.5 mg/L	0.6 mg/L	NPDES Permit: Part I.B.1
2017-09-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Average Loading	4739 kg/d	10573 kg/d	NPDES Permit: Part I.B.1
2017-09-30	GA0039012	R.M. Clayton WRC	Total Suspended Solids Weekly Average Concentration	15.0 mg/L	25.3 mg/L	NPDES Permit: Part I.B.1

GEORGIA ENVIRONMENTAL PROTECTION DIVISION
WATERSHED COMPLIANCE PROGRAM
2 MLK, JR. DR. S.E., SUITE 1152
ATLANTA, GEORGIA 30334

City of Atlanta

ATTACHMENT E

Narrative Violations

September 1, 2015 to September 30, 2017

ATTACHMENT E

City of Atlanta

Narrative Permit Violations

NPDES Permit Nos. GA0038644, GA0037168, GA0039012

September 1, 2015 to September 30, 2017

Sampling Violations:

Date of Violation	Facility	Permit Number	Violation	Citation
2015-12-28	West Area Water Quality Control Facility	GA0038644	Failure to analyze composite samples for the December 28, 2015 discharge event.	NPDES Permit PART I.B.1
2015-11-07	Custer Avenue Combined Sewer Control Facility	GA0037168	Failure to collect a grab sample for the November 7, 2015 discharge event.	NPDES Permit PART I.B.2
2016-08-26	Utoy Creek WRC	GA0039012	Failure to collect effluent composite samples.	NPDES Permit PART I.B.1
2016-09-04	Utoy Creek WRC	GA0039012	Failure to analyse influent composite sample for CBOD on September 4, 2016.	NPDES Permit PART I.B.1
2016-11-30	West Area Water Quality Control Facility	GA0038644	Failure to collect instream samples for the November 30, 2016 discharge event.	NPDES Permit PART I.B.1

Submittal Violations:

Due Date	Submittal Date	Permit Number	Violation	Citation
2015-12-31	2016-02-17	GA0038644, GA0037168	Failure to Submit By Due Date: Biotic Ligand Model Sampling Plan and Schedule For Total Recoverable Copper	NPDES Permit PART I.C.1.1
2015-12-31	2016-02-17	GA0038644, GA0037168	Failure to Submit By Due Date: Plan to Conduct Water Effect Ratios For Metals	NPDES Permit PART I.C.1.1