

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

UNITED STATES OF AMERICA,)
)
and the STATE OF GEORGIA,)
)
Plaintiffs,)
)
)
v.)
)
)
DEKALB COUNTY, GEORGIA)
)
Defendant.)
_____)

Civil Action No. 1:10-cv-04039-SDG

MODIFICATION
TO CONSENT DECREE

WHEREAS, Plaintiffs, the United States of America, on behalf of the United States Environmental Protection Agency (“EPA”), and the State of Georgia, at the request of the Georgia Department of Natural Resources, Environmental Protection Division (“EPD”), filed a complaint in this action on December 13, 2010, alleging that Defendant DeKalb County, Georgia (the “County”) violated the Federal Water Pollution Control Act, also known as the Clean Water Act (the “CWA”), 33 U.S.C. § 1251 et seq., the Georgia Water Quality Control Act, O.C.G.A. § 12-5-21 et seq. (“GWQCA”), and the regulations promulgated thereto.

WHEREAS, on December 13, 2010, the United States lodged a Proposed Settlement: Consent Decree Subject to Public Comment resolving the claims alleged in the complaint.

WHEREAS, on May 11, 2011, following a period of public comment, Plaintiffs filed a joint Motion to Enter Consent Decree.

WHEREAS, on May 13, 2011, the County filed a Motion to Enter Consent Decree.

WHEREAS, on December 20, 2011, the Court granted Plaintiffs’ joint Motion to Enter Consent Decree and entered the Consent Decree as a judgment of

the Court pursuant to Federal Rules of Civil Procedure 54 and 58, and pursuant to Section XVII (Effective Date) of the Consent Decree, the Effective Date of the Consent Decree is therefore December 20, 2011.

WHEREAS, under Paragraph 105 of the Consent Decree, the Consent Decree may be modified by a subsequent written agreement signed by the United States, the State, and the County (the “Parties”), and a material change to the Consent Decree shall be effective only upon approval by the Court.

WHEREAS, the County has acknowledged that a number of contributing factors limited and delayed its performance in the early years of Consent Decree implementation such as the County’s governing body’s delays in hiring a Consent Decree program manager, significant leadership turnover, and lack of proper oversight within the County’s Department of Watershed Management (“DWM”), and poor communication between DWM and other County departments and stakeholders. As a result, the County learned through the assessment of its WCTS – undertaken as part of the Capacity, Maintenance, Operations and Management (“CMOM”) programs of the Consent Decree – that the extent of capacity limitations in the WCTS is greater than originally understood. The assessment also

revealed new challenges in areas not previously anticipated that now require additional attention.

WHEREAS, with an improved understanding of its WCTS and the underlying causes of recurrent capacity-related Sanitary Sewer Overflow (“SSO”) sites (both within and outside of the areas previously prioritized for rehabilitation under the Consent Decree) attained through implementation of certain Consent Decree requirements, the County has begun to target the rehabilitation of locations experiencing multiple Sanitary Sewer Overflows, to prioritize reducing the Infiltration and Inflow of non-wastewater (“I/I”) into the WCTS to re-capture capacity in the WCTS, and to expand its maintenance, inspections, assessments, and rehabilitation activities. For example, as reported in the County’s publicly available annual reports, in 2017 through 2019, the County replaced nearly 3,000 vented manhole covers with solid covers to reduce I/I, conducted 8,948 manhole condition assessments outside Priority Areas, performed over 5,800 sewer creek crossing inspections, treated over 1.85 million linear feet (“LF”) of sewer mains throughout the County to remove root intrusions and prevent blockages, removed over 25 million gallons of Fats, Oils, and Grease (“FOG”) from the WCTS, completed installation of the County-wide flow monitoring and rain gauge system

to support development of a dynamic model and system flow analysis, increased FOG enforcement for non-compliant food service establishments, and completed all planned major replacement and rehabilitation projects to the County's lift stations.

WHEREAS, Paragraph 28 of the Consent Decree required the County to develop, by December 20, 2017, a computer-based dynamic hydraulic model for the County's WCTS capable of, inter alia: (1) predicting the volume of wastewater in Force Mains and the Major Gravity Sewer Lines, including predicting the peak flows during wet weather and dry weather conditions; (2) assisting in determining the likelihood and location of capacity-related SSOs from the County's WCTS; and (3) predicting the flow regime of those portions of the WCTS receiving flows from proposed developments.

WHEREAS, the County has represented to EPA/EPD that due to the County's above-described delays and performance problems during the early years of its Consent Decree implementation, the County proposed in February of 2015, in a revised System-Wide Hydraulic Model Program, the use of a static model because it could be developed more quickly and would allow for a faster assessment of its system.

WHEREAS, on March 27, 2015, EPA/EPD approved the revised System-Wide Hydraulic Model Program, and the County fully developed such a static hydraulic model by December 20, 2017.

WHEREAS, the County has now requested approval to implement a new dynamic hydraulic model that would more accurately characterize flows in its WCTS, more accurately inform the County's remedial actions for its WCTS, enable the County to better manage capacity in its collection system, and make more accurate determinations about where new connections can be accommodated under a new Capacity Assurance Program that is included as part of this Modification to Consent Decree ("Modification").

WHEREAS, the County's new dynamic hydraulic model has been peer-reviewed and is under review by EPA/EPD.

WHEREAS, Paragraph 35 of the Consent Decree establishes a Priority Areas Sewer Assessment and Rehabilitation Program ("PASARP") and requires the County to, among other things, assess and rehabilitate all Initial and Additional Priority Areas by June 20, 2020.

WHEREAS, as a result of the County's slow start in implementing the Consent Decree combined with the expanded scope of the work that remains, the

County failed to timely implement the PASARP and did not meet the June 20, 2020 Consent Decree deadline, which subjects the County to daily stipulated penalties.

WHEREAS, as part of this Modification, the County has requested an extension of the PASARP deadline.

WHEREAS, the County has represented to EPA/EPD that approximately 1,093,000 LF of the County's WCTS within the PASARP require rehabilitation or must otherwise be addressed, that all lift station rehabilitation projects have been completed, and that it does not anticipate building additional lift stations to comply with the requirements of the Consent Decree.

WHEREAS, the County reported the following number of unpermitted discharges of wastewater from its WCTS, or from a Wastewater Treatment Facility ("WWTF") caused by problems in its WCTS, that reached waters of the United States or the State ("Spills") in each year since entry of the Consent Decree: 2012 – 159 Spills; 2013 – 139 Spills; 2014 – 143 Spills; 2015 – 127 Spills; 2016 – 135 Spills; 2017 – 186 Spills; 2018 – 183 Spills; and 2019 – 225 Spills, and has paid \$859,000 in stipulated penalties under the Consent Decree for these reported Spills.

WHEREAS, the Parties agree that the Consent Decree should be modified, in light of the substantial work remaining to be completed, to, among other things, extend the original PASARP schedule.

WHEREAS, the Parties agree that it is appropriate the Consent Decree be modified to add a Capacity Assurance Program, which will use information produced by the dynamic hydraulic model to ensure that the WCTS has adequate capacity to manage wastewater flows and that determinations of the WCTS's capacity are made using the best available information.

WHEREAS, the Parties agree that the Consent Decree should be modified to require 103 priority work projects to be completed at certain additional locations in the WCTS that have been identified during the assessment as experiencing repeat SSOs, 48 of which are in Priority Areas identified under the PASARP and 55 which are not in such Priority Areas.

WHEREAS EPA/EPD have determined that it is appropriate to assess, and the County agrees to pay, an additional civil penalty which addresses the County's failure to implement the Consent Decree obligations in accordance with the original Consent Decree schedule and the Spills from its WCTS through 2019.

WHEREAS, the Parties agree that the Consent Decree may be amended pursuant to this Modification.

WHEREAS, the Parties recognize, and the Court by entering this Modification finds, that this Modification has been negotiated by the Parties in good faith and will avoid litigation among the Parties and that this Modification is fair, reasonable, and in the public interest.

NOW, THEREFORE, before the taking of any testimony, without the adjudication or admission of any issue of fact or law except as provided in Section I (Jurisdiction and Venue) of the Consent Decree, and with the consent of the Parties, IT IS HEREBY ADJUDGED, ORDERED, AND DECREED as follows:

1. The terms used in this Modification that are defined in the CWA, or in regulations promulgated pursuant to the CWA, shall have the meanings assigned to them in the CWA or such regulations, unless otherwise provided in the Consent Decree or in this Modification. Unless otherwise specifically set forth in this Modification and/or in Appendices D, E, and F, which are attached hereto and incorporated herein, the definitions set forth in Section IV (Definitions) of the Consent Decree shall apply to this Modification.

2. Except as specifically set forth in this Modification, the terms and conditions of the Consent Decree shall remain in full force and effect.

3. The following language shall be added to Section V (Civil Penalty) of the Consent Decree as Paragraph 8(a):

(a) Within thirty (30) days after the Date of Entry of this Modification, the County shall pay a civil penalty in the amount of \$1,047,000 as follows: \$523,500 to the United States and \$523,500 to the State. The County shall pay the civil penalty due to the United States in the manner set forth in Paragraph 9 of the Consent Decree and the civil penalty due to the State by submitting a check payable to the State of Georgia and tendered to the Georgia

Environmental Protection Division, Director's Office, 2 Martin Luther King, Jr. Drive SE, Suite 1452 East Tower, Atlanta, Georgia 30334.

4. Paragraphs 28 and 29 of Section VI (Remedial Actions for County's Wastewater Collection and Transmission System) of the Consent Decree shall be removed and replaced with the following language:

28. The County is in the process of developing a computer-based dynamic hydraulic model (the "Dynamic Model") for the County's WCTS utilizing modeling software, including InfoWorks ICM, that will provide a hydraulic modeling tool with a stable engine capable of processing the information needed to establish existing WCTS hydraulic conditions as well as information needed to plan for future WCTS capacity needs. The Dynamic Model shall be comprised of a "Sub-Model" for each of the following seven (7) hydraulically separate areas within the WCTS: (1) Snapfinger/Intrenchment Creek; (2) Intergovernmental/Nancy Creek; (3) Intergovernmental/North Fork Peachtree; (4) Intergovernmental/South Fork Peachtree Creek; (5) Snapfinger Basin; (6) Pole Bridge Basin; and (7) Intergovernmental/MISC Sewersheds. The Dynamic Model shall be consistent with the following criteria:

(a) The Dynamic Model shall be developed using a combination of GIS databases, record drawings, WCTS maps, flow data, and WCTS inspection records.

(b) The Dynamic Model shall be capable of predicting the volume of wastewater in Force Mains and the Major Gravity Sewer Lines, including predicting the peak flows during wet weather and dry weather conditions.

(c) The Dynamic Model shall be capable of assisting in determining the likelihood and location of capacity-related SSOs from the County's WCTS.

(d) The Dynamic Model shall be capable of predicting the hydraulic pressure (psig) and flow capacity of wastewater at any point in Force Mains throughout the County's WCTS.

(e) The Dynamic Model shall be capable of predicting the flow capacity of each lift station (for Major Lift Stations, the County may elect to perform manual calculations in lieu of using the Model to evaluate lift station capacity), including predicting the peak flows during wet weather and dry weather conditions.

(f) The Dynamic Model shall be capable of predicting the flow regime of those portions of the WCTS receiving flows from new sewer service

connections or increases in flow from existing sewer service connections. The Dynamic Model will assist the County in assuring the availability of WCTS and WWTF capacity prior to permitting flows from new sewer service connections or increases in flow from existing sewer service connections.

(g) The Dynamic Model shall include procedures and protocols for the performance of sensitivity analyses (i.e., how the Dynamic Model responds to changes in input parameters and variables); for calibrating the Dynamic Model to account for values representative of the County's WCTS using actual system data (e.g., flow data); and to verify the Dynamic Model's performance using actual system data (e.g., flow data).

29. (a) The County has completed each Sub-Model and has submitted to EPA/EPD for review and comment, pursuant to the requirements of Section VII (Review of Submissions/Certification of Submissions) of the Consent Decree, a Sub-Model Report for each of the Sub-Models. Each Sub-Model Report shall be written and organized to facilitate clear understanding of the assumptions used in the Sub-Model and how the Sub-Model is used to inform the County's decisions, and shall provide an explanation of the following elements of the Sub-Model:

(1) A description of the Sub-Model;

- (2) The specific attributes, characteristics, and limitations of the Sub-Model;
- (3) An identification of all input parameters, constants, and assumed values of the Sub-Model;
- (4) Any global assumptions and the design storm used in the Sub-Model;
- (5) The expected outputs of the Sub-Model;
- (6) The procedures and protocols used to evaluate the Sub-Model's performance;
- (7) Model sensitivity analyses;
- (8) Calibration procedures and the basis for inputs used to characterize I/I into the Sub-Model;
- (9) A description of how the Sub-Models will be hydraulically integrated or fit into the County's three (3) sewer basins;
- (10) After submission of the first Sub-Model, any deviation in the Sub-Model's methodology from the methodology used in the first Sub-Model shall be highlighted and explained; and

(11) Any unexpected or other output from the Sub-Model that will affect the County's ability to comply with any of the deadlines or other requirements of the Consent Decree or this Modification.

The County shall also provide in the Sub-Model Reports a certification that the Sub-Model was developed fully consistent with the requirements of the Consent Decree, as amended by this Modification. EPA/EPD may subsequently conduct periodic audits of the Dynamic Model implementation without prior notice to the County. EPA/EPD shall provide a written report to the County of the findings/results of any such audit.

(b) The County has developed a Capacity Assurance Program ("CAP"), attached hereto and incorporated herein as Appendix D, which has been reviewed and approved by EPA/EPD. The CAP will allow the County to identify each Sewershed or part of a Sewershed with insufficient capacity under either peak wet weather, or average conditions, or both, and to analyze all portions of the WCTS that hydraulically impact all known SSOs. The CAP will assess peak flow capacity of all major system components for existing and proposed flows.

(c) Upon written approval by EPA/EPD of each Sub-Model Report, the County shall authorize pursuant to the CAP new sewer service connections or

increases in flow from existing sewer service connections in the portion of the WCTS covered by that Sub-Model only after: (1) certifying that the receiving portions of the WCTS have “Adequate Collection Capacity” and “Adequate Transmission Capacity” and the applicable WWTF has “Adequate Treatment Capacity” (as these terms are defined in subparagraph (d) below) to accept flows from such new sewer service connections or increases in flows from existing service connections; (2) certifying that the receiving portions of the WCTS have “Adequate Transmission Capacity”, the applicable WWTF has “Adequate Treatment Capacity” (as these terms are defined in subparagraph (d) below) to accept flows from such new sewer service connections or increases in flows from existing service connections, and that all “New Connection Conditions” identified in new Paragraph 29(f) are satisfied; or (3) certifying its proper use of the In-Lieu of Certification, Essential Services, Illicit Connections and/or Lateral Connections provisions in the CAP. All certifications of Adequate Collection Capacity, Adequate Transmission Capacity, and Adequate Treatment Capacity shall be made and stamped by a professional engineer registered in the State of Georgia and shall be approved by a responsible party of the County as defined by 40 C.F.R. § 122.22(b). The County shall maintain all such certifications and all data

on which such certifications are based as required by Paragraph 88 of the Consent Decree.

(d)(1) The County's certification of "Adequate Treatment Capacity" shall confirm that, at the time the WWTF receives the flow from a proposed new sewer service connection(s) or increased flow from an existing sewer service connection(s), when combined with the flow predicted to occur from all other authorized sewer service connections (including those that have not begun to discharge into the WCTS), the WWTF will not be in "non-compliance" for quarterly reporting as defined in Appendix A to 40 C.F.R. Part 123.45.

(2) The County's certification of "Adequate Transmission Capacity" shall confirm that each lift station (except for those lift stations with only one pump) through which the proposed additional flow from new or existing sewer service connections would pass to the WWTF receiving such flow has the capacity to transmit, with its largest pump out of service, the existing One (1) Hour Peak Flow passing through the lift station, plus the addition to the existing One (1) Hour Peak Flow predicted to occur from the proposed connection, plus the addition to the existing One (1) Hour Peak Flow predicted to occur from all other

authorized sewer service connections that have not begun to discharge into the WCTS.

(3) The County's certification of "Adequate Collection Capacity" shall confirm that each gravity sewer line, through which the proposed additional flow from new or existing connections would pass, has the capacity to carry the existing One (1) Hour Peak Flow passing through the gravity sewer line, plus the addition to the existing One (1) Hour Peak Flow from the proposed connection, plus the addition to the existing One (1) Hour Peak Flow predicted to occur from all other authorized sewer service connections that have not begun to discharge into the WCTS without causing a Surcharge Condition.

(4) For purposes of this Paragraph only, the term "One (1) Hour Peak Flow" shall mean the greatest flow in a sewer averaged over a sixty (60) minute period at a specific location expected to occur as a result of a representative two (2) year twenty-four (24) hour storm event.

(5) For purposes of this Paragraph only, the term "Surcharge Condition" shall mean the condition that exists when the supply of wastewater resulting from the One (1) Hour Peak Flow is greater than the capacity of the pipes to carry it or the surface of the wastewater rises to an elevation greater than the top

of the pipe, and the sewer is under pressure or head, rather than at atmospheric pressure. However, if the County has identified sewer line segments which have been specifically designed and constructed to operate under surcharge conditions (e.g., segments with welded or bolted joints), and has identified the level of surcharge for those segments, the identified level of surcharge will be used.

Notwithstanding the immediately preceding sentence, any rise in elevation above the top of the pipe shall be considered a Surcharge Condition if the manhole has experienced a wet weather SSO since December 20, 2017 (excluding those SSOs caused by severe natural conditions such as hurricanes, tornados, widespread flooding, earthquakes, and other similar natural conditions (“Severe Natural Conditions”)), unless the County can certify that the cause of the SSO has been corrected through improvements to the WCTS.

(e) Until the County has received written approval from EPA/EPD of a Sub-Model Report for each one of the seven (7) hydraulically separate areas within the WCTS, the County shall continue to use in that area its existing static hydraulic models and shall continue to certify adequate collection capacity, adequate transmission capacity, and adequate treatment capacity for all new sewer

service connections or increases in flow from existing sewer service connections pursuant to the original provisions of Paragraph 28(g) of the Consent Decree.

(f) The “New Connection Conditions” referred to in new Paragraph 29(c) are:

(1) The Dynamic Model does not predict any overflows from the new sewer service connections and/or increases in flow from the existing sewer service connections;

(2) The Dynamic Model does not predict that, after adding the new sewer service connections and/or increases in flow from the existing sewer service connections to all existing and authorized sewer connections, the wastewater in any manhole from the One (1) Hour Peak Flow resulting from a representative two (2) year twenty-four (24) hour storm event will rise to an elevation within two (2) feet of ground surface at any location in the WCTS through which the proposed additional flows from the new or existing connection would pass. However, for manholes within 350 feet of the entrance to or exit from aerial crossings (at locations including creeks, dry beds, stormwater ditches and conveyances, and intermittent and ephemeral streams) with less than two (2) feet

of ground cover over their connecting pipes, the wastewater predicted as described above shall not rise to an elevation within two (2) feet of manhole rim.

(3) All capacity-related locations on the “Priority Fix List” (as described in new Paragraph 35(j)) downstream of the proposed new sewer service connection or proposed increase in flow from an existing sewer service connection have been adequately rehabilitated, relieved, fixed, or otherwise addressed (“Adequately Fixed” (This term is defined only for purposes of determining eligibility for removal of such location from the Priority Fix List and for satisfaction of the New Connection Conditions. The County shall not maintain Adequately Fixing any location on the Priority Fix List as a defense to any subsequent violation of the CWA, the GWQCA, and the regulations promulgated thereto at such location nor to the imposition of stipulated penalties pursuant to Section X (Stipulated Penalties) of the Consent Decree.)), and either: (i) at least one (1) year has passed since completion of such Adequate Fixes without a capacity-related SSO occurring at any such location; or (ii) each such location has experienced a two (2) year twenty-four (24) hour storm event (or a twenty-four (24) hour storm event of greater size) without a capacity-related SSO; and

(4) Any location that has experienced a capacity-related SSO (excluding those SSOs caused by Severe Natural Conditions) within the previous two (2) years downstream of the proposed new sewer service connection or proposed increase in flow from an existing sewer service connection has been adequately rehabilitated, relieved, fixed, or otherwise addressed, and either: (i) at least one (1) year has passed without a capacity-related SSO (excluding those SSOs caused by Severe Natural Conditions) occurring at each such location; or (ii) each such location has experienced a two (2) year twenty-four (24) hour storm event (or a twenty-four (24) hour storm event of greater size) without a capacity-related SSO (excluding those SSOs caused by Severe Natural Conditions).

7. Paragraph 35(i) of the Consent Decree shall be removed and replaced with the following language:

(i) Provide for the identification, delineation, assessment and rehabilitation of all Initial and Additional Priority Areas no later than December 20, 2027. Attached as Appendix E is a schedule for the identification, delineation, assessment and rehabilitation of the Initial and Additional Priority Areas, including interim milestone dates based on amounts of “Minimum Linear Footage of Pipe Review, Design, and Rehabilitation” (as that term is defined in Appendix E) of

four (4) “Project Categories” to be completed in the Initial and Additional Priority Areas each calendar year, beginning calendar year 2020 and continuing each calendar year until completion of the PASARP. The Project Categories, which are also each defined in Appendix E, are: (1) Simple Pipe Review, (2) Simple Pipe Rehabilitation, (3) Complex Pipe Design, (4) and Complex Pipe Rehabilitation. In addition to identifying the total Minimum Linear Footage of Pipe Review, Design, and Rehabilitation for each Project Category to be completed each calendar year, the schedule identifies the specific projects to be completed before December 31, 2021. The County’s rehabilitation of all the Minimum Linear Footage of Pipe Review, Design, and Rehabilitation shall not, by itself, constitute complete implementation of the PASARP; all other components of the PASARP shall continue to apply as required by Paragraph 35 of the Consent Decree.

Beginning February 1, 2022, and continuing each February 1 until completion of the PASARP, the County shall provide a certified report to EPA/EPD, pursuant to the requirements of Section VII (Review of Submissions/Certification of Submissions) of the Consent Decree, identifying all projects planned to satisfy the Minimum Linear Footage of Pipe Review, Design, and Rehabilitation requirement for each Project Category for that calendar year, as

well as a list of any lift station rehabilitation and/or construction and construction of additional storage planned for any subsequent years until completion of the PASARP and a deadline for completion of such project(s). The County shall not be precluded from re-prioritizing linear footage rehabilitation projects in any given calendar year or between calendar years, provided that the County achieves the total Minimum Linear Footage of Pipe Review, Design, and Rehabilitation for each Project Category for the given calendar year. The County must submit to EPA/EPD for review and comment, pursuant to the requirements of Section VII (Review of Submissions/Certification of Submissions) of the Consent Decree, any plans to re-prioritize, lift station rehabilitation and/or construction or construction of additional storage. Additional linear footage of rehabilitation work of a particular Project Category completed in a given calendar year beyond the minimum requirement for that particular calendar year shall be counted toward the subsequent year or years.

8. The following language shall be added to Section VI (Remedial Actions for County's Wastewater Collection and Transmission System) of the Consent Decree as Paragraph 35(j):

(j) Priority Fix List and Repeat SSO Locations. Attached hereto and incorporated herein as Appendix F is an initial “Priority Fix List” of 103 locations in the County’s WCTS that that are known to have experienced repeated SSOs since the Effective Date of the Consent Decree through June 30, 2020. Within two (2) years of the Date of Entry of this Modification, the County shall adequately rehabilitate, relieve, fix, or otherwise address fifty percent (50%) of the locations in Appendix F so that no future SSOs are predicted to occur at such locations as a result of a representative two (2) year twenty-four (24) hour storm event, and within four (4) years of the Date of Entry of this Modification, the County shall adequately rehabilitate, relieve, fix, or otherwise address all locations in Appendix F so that no future SSOs are predicted to occur at any such locations as a result of a representative two (2) year twenty-four (24) hour storm event. No later than February 1, 2021, the County may submit to EPA/EPD for review and approval, a request for additional time to Adequately Fix up to twenty-one (21) specific locations in Appendix F; the County may invoke Dispute Resolution pursuant to Section XII (Dispute Resolution) of the Consent Decree if EPA/EPD do not approve. Any such request shall include a detailed description of the proposed project to Adequately Fix the location, a proposed timeline (including interim

project milestones), and a technical justification for the proposed timeline, which must not extend beyond December 20, 2027.

Any location in the County's WCTS shall immediately be added to the Priority Fix List if it experiences in any twelve (12) month period either two (2) or more SSOs caused by a lack of Adequate Collection Capacity or Adequate Transmission Capacity (including I/I and/or storms, but excluding those SSOs caused by Severe Natural Conditions)) or two (2) or more SSOs caused by non-capacity reasons within a 500-foot radius area ("Repeat SSO Location"). If the County believes that a specific SSO should not be counted in determining whether a location shall be deemed a Repeat SSO Location, it shall notify EPA/EPD within sixty (60) days of the SSO and provide a detailed, certified explanation of the reason(s) for its belief; the County may invoke Dispute Resolution pursuant to Section XII (Dispute Resolution) of the Consent Decree if EPA/EPD do not agree. Additionally, no Repeat SSO Location shall be added to the Priority Fix List after EPA/EPD approve the County's PASARP Report (as required by Paragraph 37 of the Consent Decree).

If any Repeat SSO Location is added to the Priority Fix List prior to, on, or within two (2) years of, the Date of Entry of this Modification, the

County shall, within four (4) years of the Date of Entry of this Modification, adequately rehabilitate, relieve, fix, or otherwise address such location so that no future SSOs are predicted to occur at such location as a result of a representative two (2) year twenty-four (24) hour storm event. If any Repeat SSO Location is added to the Priority Fix List after two (2) years of the Date of Entry of this Modification, the County shall, within two (2) years of the location's addition to the Priority Fix List (i.e., the date of the second qualifying SSO), adequately rehabilitate, relieve, fix, or otherwise address the location so that no future SSOs are predicted to occur at such location as a result of a representative two (2) year twenty-four (24) hour storm event.

If any Repeat SSO Location associated with Major Gravity Sewer Lines is added to the Priority Fix List after Date of Entry of this Modification and the County determines that it cannot Adequately Fix the location within the timelines proscribed in the immediately preceding paragraph, the County may, within ninety (90) days of such location being added to the Priority Fix List, submit to EPA/EPD for review and approval, a proposed alternative timeline for addressing the location; the County may invoke Dispute Resolution pursuant to Section XII (Dispute Resolution) of the Consent Decree if EPA/EPD

do not approve. Any such request shall include a detailed description of the proposed project to Adequately Fix the location, a proposed timeline (including interim project milestones), and a technical justification for the proposed timeline.

9. The following language shall be added to Section IX (Reporting Requirements) of the Consent Decree as Paragraph 56(a):

(a) In addition to the information in Paragraph 56 of the Consent Decree, each Quarterly SSO Report shall also include:

(1) For each SSO, a determination of whether such SSO was caused by either a lack of Adequate Collection Capacity or Adequate Transmission Capacity, or by non-capacity reasons, and documentary support for the County's determination, including, where appropriate:

(i) If the County determines the cause of a particular SSO to be due to FOG, debris, any other sewer blockage, or infrastructure failure, the County shall provide photographic or video evidence supporting such determination or shall provide documentation of dry weather conditions at the time of the SSO based on information from the closest rainfall monitoring station to the SSO's location.

(ii) If the County determines the cause of a particular SSO to be a lack of Adequate Collection Capacity or Adequate Transmission Capacity and the SSO occurred during a precipitation event, the County shall provide rainfall data from the closest rainfall monitoring station to the SSO's location; except, the County may presume an SSO is capacity-related if it documents in its Quarterly SSO Report, after investigating the cause of the SSO, that it was unable to locate any evidence of FOG, debris, any other sewer blockage, or infrastructure failure.

(b) For each SSO, the Initial or Additional Priority Area in which such SSO occurred, if applicable.

(c) An updated Priority Fix List of all Repeat SSO Locations, as provided in new Paragraph 35(j).

(d) If the rehabilitation of any Repeat SSO Location was scheduled to be completed during the previous applicable three (3) month period, a statement that such work has or has not been completed. The County shall include a detailed written description of any such work not completed, the reasons for failing to complete such work, and the expected date of completion. If any missed deadline cannot be fully explained at the time the report is due, the County shall include a

statement to that effect in the report. The County shall investigate to determine the cause of the missed deadline and then shall submit an amendment to the report, including a full explanation of the cause of the missed deadline, within thirty (30) days after submission of the Quarterly SSO Report.

10. The following language shall be added to Section IX (Reporting Requirements) of the Consent Decree as Paragraphs 57(c)-(e):

(c) Each Semi-Annual Report shall include a detailed written description, supplemented by a Gantt chart, of projects and significant activities completed and interim milestone dates and deadlines achieved under the PASARP during the previous applicable six (6) month period for each Initial or Additional Priority Area. Each Semi-Annual Report shall also include a list of all Initial and/or Additional Priority Areas wherein the County has completed all work required by the PASARP and the date on which the County completed such work. Each Semi-Annual Report shall also include a detailed written description of any missed interim milestone date and deadlines, the reasons for missing such interim milestone dates and deadlines, and the expected date for completing the applicable work. If any missed interim milestone date or deadline cannot be fully explained at the time the report is due, the County shall include a statement to that effect in

the report. The County shall investigate to determine the cause of the missed interim milestone date or deadline and then shall submit an amendment to the report, including a full explanation of the cause of the missed deadline, within thirty (30) days after submission of the Semi-Annual Report. If the Parties agree to discontinue the Semi-Annual Reports pursuant to Paragraph 57 of the Consent Decree, then the information required in this subparagraph shall be included in each Annual Report submitted pursuant to Paragraph 58 of the Consent Decree and shall cover the applicable twelve (12) month periods rather than six (6) months.

(d) Each Semi-Annual Report shall include a detailed written description, supplemented by a Gantt chart, of projects and significant activities anticipated to be performed and interim milestone dates and deadlines anticipated to be achieved under the PASARP during the successive applicable six (6) month period in each Initial or Additional Priority Area, and a list of all Initial and/or Additional Priority Areas wherein the County anticipates completing all work required by the PASARP and the date on which the County anticipates completing such work. If the Parties agree to discontinue the Semi-Annual Reports pursuant to Paragraph 57 of the Consent Decree, then the information required in this subparagraph shall be included in each Annual Report submitted pursuant to

Paragraph 58 and shall cover the applicable twelve (12) month periods rather than six (6) months.

(e) In addition to all reporting requirements previously described in this Section, after entry of this Modification, the County shall file a copy of each new Quarterly and Semi-Annual Report with this Court on the same date such report is required to be filed with EPA/EPD under Paragraph 57 of the Consent Decree. If the Parties agree to discontinue the Semi-Annual Reports pursuant to Paragraph 57 of the Consent Decree, then the County shall file a copy of each Annual Report with this Court on the same day such report is required to be filed with EPA/EPD.

11. The following language shall be added to Section IX (Reporting Requirements) of the Consent Decree as Paragraph 58(c)-(f):

(c) The Minimum Linear Footage of Pipe Review, Design, and Rehabilitation completed in each Project Category for that calendar year, a detailed written description of the work that was done to complete such rehabilitation, and a detailed written description of how the County calculated the Minimum Linear Footage of Pipe Review, Design, and Rehabilitation completed and how it apportioned such rehabilitation to each Project Category.

(d) A description of any lift station rehabilitation and/or construction and construction of additional storage undertaken and/or completed pursuant to modified Paragraph 35(i).

(e) A detailed written description of all ongoing or completed work at the locations on the Priority Fix List and a list of such locations that have been adequately rehabilitated, relieved, fixed, or otherwise addressed so that no future SSOs are predicted to occur at any such locations as a result of a representative two (2) year twenty-four (24) hour storm event.

(f) If the County fails to timely adequately rehabilitate, relieve, fix, or otherwise address the locations on the Priority Fix List pursuant to the deadlines in new Paragraph 35(j), a detailed written explanation of the reasons for such failure.

12. The following language shall be added to Section X (Stipulated Penalties) of the Consent Decree as Paragraph 64(a):

(a) If the County fails to pay the civil penalty required to be paid to the United States or the State under new Paragraph 8(a) when due, the County shall pay a stipulated penalty of \$1,000 per day for each day that the payment is late.

13. Paragraphs 65(b), (c), (d), (d), and (e) of the Consent Decree shall be removed and replaced with the following language:

(b) For each day the County fails to complete the implementation of the PASARP in accordance with the deadline in modified Paragraph 35(i), a stipulated penalty may be assessed as follows:

<u>Period Beyond Completion Date</u>	<u>Penalty Per Day</u>
1-30 days	\$2,000
31-60 days	\$3,000
61-120 days	\$4,000
More than 120 days	\$6,000

(c) For each Spill of 10,000 gallons or less, a stipulated penalty of \$2,000 may be assessed.

(d) For each Spill of more than 10,000 gallons, a stipulated penalty of \$5,000 may be assessed.

(e) For each failure to timely submit a Quarterly SSO Report, a Semi-Annual Report, an Annual Report, or the SEP Completion Report as required in Sections VIII and IX of this Consent Decree, a stipulated penalty for each day the County remains out of compliance for failure to timely submit any of the above reports may be assessed as follows:

<u>Period Beyond Submittal Date</u>	<u>Penalty Per Violation Per Day</u>
-------------------------------------	--------------------------------------

1-30 days	\$500
More than 30 days	\$1,000

(f) After receiving the SEP Completion Report, in the event EPA/EPD notifies the County that the County has failed to satisfactorily complete the SEP in accordance with the terms of this Consent Decree as described in Section VIII and Appendix C (including the allowable expenditures for the SEP), a stipulated penalty of \$375,000 may be assessed if the County does not cure the deficiencies identified in EPA/EPD's notice within ninety (90) Days after receiving such notice. Notwithstanding the foregoing, if EPA/EPD determines that the County has made good faith efforts to satisfactorily complete the SEP and has certified, with supporting documentation, that at least ninety (90) percent of the required amount of money has been spent on the SEP, the County shall not be liable for any stipulated penalty.

14. The following language shall be added to Section X (Stipulated Penalties) of the Consent Decree as Paragraphs 65(g)-(l):

(g) For each day the County fails to timely achieve the Minimum Linear Footage of Pipe Review, Design, and Rehabilitation for a particular

calendar year required by modified Paragraph 35(i) and stated in Appendix E, a stipulated penalty may be assessed as follows:

<u>Period Beyond Completion Date</u>	<u>Penalty Per Day</u>
1-30 days	\$1,000
31-60 days	\$1,500
61-120 days	\$2,000
More than 120 days	\$3,000

(h) For each day the County fails to timely complete the lift station rehabilitation and/or construction and construction of additional storage by the deadline provided by the County pursuant to modified Paragraph 35(i), a stipulated penalty may be assessed as follows:

<u>Period Beyond Completion Date</u>	<u>Penalty Per Day</u>
1-30 days	\$1,000
31-60 days	\$1,500
61-120 days	\$2,000
More than 120 days	\$3,000

(i) (1) For each new sewer service connection or increase in flow from an existing sewer service connection of 2,500 gallons per day or less

authorized by the County in violation of new Paragraphs 29(c), (d) and/or (e), a stipulated penalty of \$10,000 may be assessed.

(2) For each new sewer service connection or increase in flow from an existing sewer service connection of more than 2,500 gallons per day authorized by the County in violation of new Paragraphs 29(c), (d) and/or (e), a stipulated penalty of \$50,000 may be assessed.

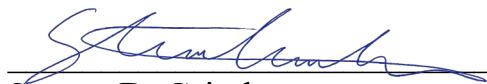
(j) For each Priority Fix List location for which the County fails to timely complete the rehabilitation work required by new Paragraph 35(j), a stipulated penalty may be assessed for each day as follows (i.e., if the County fails to complete the rehabilitation work at multiple Priority Fix List Locations, daily stipulated penalties for each location may be assessed):

<u>Period Beyond Completion Date</u>	<u>Penalty Per Day</u>
1-30 days	\$1,000
31-60 days	\$1,500
61-120 days	\$2,000
More than 120 days	\$3,000

(k) For each SSO for which the County inaccurately designates as capacity-related or not capacity-related in a Quarterly SSO Report, based on data available at the time of the report, a stipulated penalty of \$5,000 may be assessed.

(l) For each SSO that the County provides inadequate documentary support in a Quarterly SSO Report, a stipulated penalty of \$5,000 may be assessed.

Dated and entered this 22nd day of September, 2021.

A handwritten signature in blue ink, appearing to read "Steven D. Grimberg", written over a horizontal line.

Steven D. Grimberg
UNITED STATES DISTRICT JUDGE
Northern District of Georgia

WE HEREBY CONSENT to the entry of this Modification of the Consent Decree in *United States et al. v. DeKalb County, Georgia*, subject to the public notice and comment provisions of 28 C.F.R. 50.7:

JONATHAN D. BRIGHTBILL
Principal Deputy Assistant Attorney General
Environment and Natural Resources Division
U.S. Department of Justice

/s/ Valerie K. Mann
VALERIE K. MANN
Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
United States Department of Justice
P.O. Box 7611
Washington, DC 20044-7611
150 M St, NE
Washington, D.C. 20530
DC Bar 440744
Telephone: (202) 616-8756
Facsimile: (202) 514-0097
E-mail: Valerie.mann@usdoj.gov

WE HEREBY CONSENT to the entry of this Modification of the Consent Decree in *United States et al. v. DeKalb County, Georgia*, subject to the public notice and comment provisions of 28 C.F.R. 50.7:

BYUNG J. PAK
United States Attorney
Northern District of Georgia

/s/ Trishanda L. Treadwell
TRISHANDA L. TREADWELL
Assistant United States Attorney
Georgia Bar No. 356896
Richard Russell Federal Building
75 Ted Turner Drive SW
Atlanta, Georgia
Telephone: (404) 581-6000
Facsimile: (404) 581-6181
Email: Trish.treadwell@usdoj.gov

WE HEREBY CONSENT to the entry of this Modification of the Consent Decree in *United States et al. v. DeKalb County, Georgia*, subject to the public notice and comment provisions of 28 C.F.R. 50.7:



SUSAN PARKER BODINE
Assistant Administrator
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency

ROSEMARIE KELLEY
Office Director
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency

MARK POLLINS
Division Director
Water Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency

ROBERT D. FENTRESS
Attorney-Advisor
Water Enforcement Division
Office of Civil Enforcement
Office of Enforcement and Compliance Assurance
United States Environmental Protection Agency

WE HEREBY CONSENT to the entry of this Modification of the Consent Decree in *United States et al. v. DeKalb County, Georgia*, subject to the public notice and comment provisions of 28 C.F.R. 50.7:



LEIF PALMER
Regional Counsel
United States Environmental Protection Agency
Region 4
61 Forsyth Street
Atlanta, Georgia 30303
Telephone: (404) 562-9542
Facsimile: (404) 562-9663
Email: Palmer.leif@epa.gov

PAUL SCHWARTZ
Associate Regional Counsel
United States Environmental Protection Agency
Region 4

NATHAN H. STOPPER
Assistant Regional Counsel
United States Environmental Protection Agency
Region 6

WE HEREBY CONSENT to the entry of this Modification of the Consent

Decree in *United States et al. v. DeKalb County, Georgia*:

CHRISTOPHER M. CARR
Attorney General

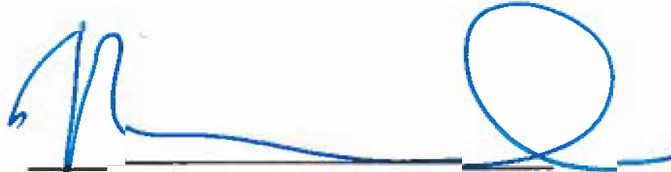
/s/ Margaret Kemmerly Eckrote
MARGARET KEMMERLY ECKROTE
Georgia Bar No. 238709
Deputy Attorney General

ROBIN LEIGH
Senior Assistant Attorney General

/s/ Christopher R. Held
CHRISTOPHER R. HELD
Georgia Bar No. 987847
Assistant Attorney General
40 Capitol Square SW
Atlanta, GA 30334-1300
Telephone: (404) 458-3569
Email: peckrote@law.ga.gov
Email: cheld@law.ga.gov

WE HEREBY CONSENT to the entry of this Modification of the Consent

Decree in *United States et al. v. DeKalb County, Georgia*:



THE HONORABLE MICHAEL L. THURMOND
Chief Executive Officer
DeKalb County Government



MARIA V. HOUSER

Director
DeKalb Consent Decree and Environmental Compliance



VIVIANE H. ERNSTES

County Attorney
DeKalb County Law Department



E. FITZGERALD VEIRA

Georgia Bar Number 726726
Troutman Pepper Hamilton Sanders LLP
Special Counsel to DeKalb County
600 Peachtree Street NE, Suite 3000
Atlanta, Georgia 30308-2218
Telephone: (404) 885-3278
Facsimile: (404) 962-6711
Email: Fitzgerald.Veira@Troutman.com

APPENDIX D TO CONSENT DECREE MODIFICATION

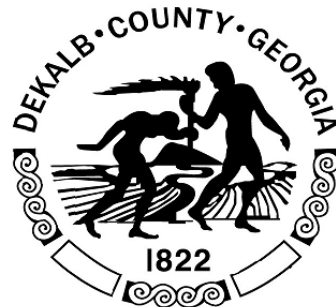
Capacity Assurance Program

Submitted to

U.S. Environmental Protection Agency
Georgia Environmental Protection Division

Submitted by

Department of Watershed
Management
DeKalb County, Georgia



Case No. 1:10 cv 4039-SDG

Prepared by

CDPMT

September 2020

Contents

Section	Page
Acronyms and Abbreviations	iii
Introduction	1-1
1.1 Purpose	1-1
1.2 Authority	1-2
1.3 Related DeKalb County Documents.....	1-2
1.4 Implementation Schedule.....	1-2
Overview	2-1
2.1 Description of Wastewater Collection and Transmission System	2-1
2.2 Key Elements of the CAP.....	2-1
2.3 Definitions.....	2-1
Capacity Evaluation Program	3-1
3.1 Capacity Request Submittal.....	3-1
3.1.1 Flow Estimates for Additional Flows.....	3-1
3.1.2 Other Required Information	3-1
3.2 Capacity Analysis Evaluation.....	3-2
3.3 Issuance of Certifications.....	3-2
3.4 Minor Sewer Connections.....	3-2
3.5 Capacity Approval In Lieu of Certification Process	3-2
3.5.1 Essential Services	3-3
3.5.2 Existing Illicit Connections	3-3
3.6 Temporary Service Lateral Suspensions	3-3
3.7 Issuance of Land Development or Building Permits	3-3
Capacity Analysis	4-1
4.1 Methodology.....	4-1
4.1.1 Hydraulic Model.....	4-1
4.1.2 System Flows	4-1
4.2 Collection Capacity Analysis.....	4-2
4.2.1 Procedure.....	4-2
4.2.2 Collection Capacity Definition.....	4-2
4.3 Transmission Capacity Analysis	4-2
4.3.1 Procedure.....	4-2
4.3.2 Transmission Capacity Definition.....	4-3
4.4 Treatment Capacity Analysis.....	4-3
4.4.1 Procedure.....	4-3
4.4.2 Treatment Capacity Definition.....	4-3
4.5 New Connection Conditions	4-3
4.5.1 Procedure.....	4-3
4.5.2 New Connection Conditions Definition	4-3
Banking Credit System	5-1
5.1 Capacity Assurance Information Management System.....	5-1
5.2 Deposits	5-1
5.3 Capacity Enhancing Projects	5-2

CONTENTS

5.3.1	Offline Storage	5-2
5.3.2	Removal of Connections	5-2
5.3.3	Gravity Sewer Line Improvements.....	5-2
5.3.4	LS Improvements	5-2
5.3.5	Treatment Facility Improvements	5-2
5.3.6	I/I Reduction Projects	5-2
5.3.7	Conditional Reduction in Banking Credit Ratios Used for Gravity Sewer Line Improvement and I/I Reduction	5-4
5.4	Capacity Approvals In Lieu of Capacity Certification	5-4
References.....		6-1

Appendixes

Appendix A Department Watershed Management Organizational Chart

Appendix B Sewerbasin Map

Appendix C Capacity Evaluation Process Flowchart

Appendix D Sewer Capacity Evaluation Request Form

Appendix E Modeling Area Map

Appendix F Sewer Lift Station and Force Main Map

Tables

Table 1-1. CAP Related Documents

Table 5-1. Estimated Peak Flow Reductions for Gravity Sewer Rehabilitation

Table 5-2. Estimated Peak Flow Reductions for Storm Drain and Downspout Removal

Table 5-3. Estimated Peak Flow Reductions for Vented Manhole Lid Replacement

Table 5-4. Earned Base Credits for Repair of Manhole Defects (in gpd)

Acronyms and Abbreviations

ADWF	average dry-weather flow
ASCE	American Society of Civil Engineers
CAP	Capacity Assurance Program
CD	Consent Decree
CDPMT	Consent Decree Program Management Team
CFR	Code of Federal Regulations
DWM	Department of Watershed Management (DeKalb County)
EPA	United States Environmental Protection Agency
EPD	Georgia Environmental Protection Division
GIS	geographic information system
gpd	gallon(s) per day
HGL	hydraulic gradeline
I/I	infiltration and inflow
IMS	information management system
LS	lift station
MCD	Modification to the Consent Decree
MS4	municipal separate storm sewer system
NPDES	National Pollution Discharge Elimination System
SSO	sanitary sewer overflow
WCTS	wastewater collection and transmission system
WEF	Water Environment Federation
WWTF	wastewater treatment facility

SECTION 1

Introduction

1.1 Purpose

On December 20, 2011, DeKalb County (hereafter, the “County”) entered into a consent decree with the United States and the State of Georgia (hereafter, the “State”), in the case styled United States of America et al. v. DeKalb County, Georgia, No. 1:10-cv-4039-WSD (hereafter, the “CD”). The Modification to the CD (hereafter, the “MCD”) authorizes the implementation of a Capacity Assurance Program (CAP). The County’s Department of Watershed Management (DWM) has prepared the following Capacity Assurance Program for review and approval by the United States Environmental Protection Agency (EPA) and the Georgia Environmental Protection Division (EPD), pursuant to paragraph 29 of the MCD.

This CAP will be used to identify each sewer shed or part of a sewer shed with insufficient capacity under either peak wet weather, or average conditions, or both. It will also be used to analyze all portions of the wastewater collection and transmission system (“WCTS”) that hydraulically impact all known sanitary sewer overflows (“SSOs”) and to assess peak flow capacity of all major system components for existing and proposed flows.

The CAP ensures that the County will only authorize new sewer service connections, or increases in flow from existing sewer service connections, after the County certifies that the analysis procedures contained in the approved CAP have been used and that the County has determined, based on those procedures, that there is Adequate Treatment Capacity, Adequate Transmission Capacity, and Adequate Collection Capacity as set forth in Section 4 herein. The CAP contains the following components:

- The technical information, methodology, and analytical techniques, including the model or software, to be used by the County to calculate collection, transmission, and treatment capacity;
- The means by which the County will integrate its capacity certification with the issuance of building permits and the acquisition of new or existing sewers from other owners;
- The technical information, methodology, and analytical techniques to calculate the net (cumulative) increase or decrease in volume of wastewater introduced to the WCTS resulting from the County’s authorization of new sewer service connections and changes in flow from existing connections and the completion of: a) specific projects that add or restore capacity to the WCTS or the wastewater treatment facility (WWTF) (hereafter, “Capacity Enhancing Projects”), b) specific projects that reduce peak flow through removal of inflow and infiltration (I/I) (hereafter, “I/I Projects”), and c) permanent removal of sewer connections (hereafter, “Removal of Connections”);
- A method for information management capable of tracking the accumulation of banked credits from completion of Capacity Enhancing Projects, I/I Projects, and Removal of Connections; the capacity-limited portion of the sewerbasin in which those credits were earned; and the expenditure of such credits; and
- All evaluation protocols to be used to calculate collection, transmission, and treatment capacity including, but not limited to, standard design flow rate, rules of thumb regarding pipe roughness, manhole head losses, as-built drawing accuracy (distance and slope), and water use (gallons per capita per day); projected flow impact calculation techniques; and metering of related existing peak flows (flows metered in support of analysis and/or manual observation of existing peak flows).

SECTION 1

1.2 Authority

The County's legal authority for the development and implementation of this CAP is:

- The U.S. Clean Water Act
- Georgia Water Quality Control Act
- The previously discussed modified CD

1.3 Related DeKalb County Documents

The County has several documents that are critical to and referenced throughout this CAP. Table 1-1 lists the documents and their locations.

Table 1-1. CAP Related Documents

Document	Location
DeKalb County DWM Water and Sewer Design Standards Manual	DeKalb County DWM website
Priority Areas Sewer Assessment and Rehabilitation Program	DeKalb County DWM website
System-Wide Flow & Rainfall Monitoring Program	DeKalb County DWM website
Sewer Mapping Program	DeKalb County DWM website
System-Wide Hydraulic Model	DeKalb County DWM website
Infrastructure Acquisitions Program	DeKalb County DWM website
Sub-Model Reports	DeKalb County DWM website

1.4 Implementation Schedule

The following is required prior to use of the Fully Developed Dynamic Model for approval of new sewer connections within each Sub-Model Area:

- Completion of submission of Sub-Model to the EPA/EPD for review and comment
- Written approval from the EPA/EPD of the Sub-Model Report
- Entry of the MCD in Federal Court

Until all of the criteria listed above are completed, the County shall continue to use in that area its existing hydraulic models to evaluate, and where appropriate certify, adequate capacity for all new sewer service connections or increases in flow from existing sewer service connections pursuant to the original provisions of Paragraph 28(g) of the CD.

SECTION 2

Overview

2.1 Description of Wastewater Collection and Transmission System

The County owns, operates, maintains, and manages a network of pipes, manholes, lift stations (LS), force mains, and associated appurtenances that transport wastewater from homes, businesses, and industries to the Snapfinger Wastewater Treatment Facility (WWTF), the Pole Bridge WWTF, and to intergovernmental partners' wastewater facilities outside the County. That infrastructure is part of the County's WCTS, as defined in the CD and herein. Property owners own the private service laterals from the served residential, commercial, and industrial structures to the public sewer main in the street or right-of-way, including the connection.

The County's WCTS currently serves approximately 620,000 people in a service area of more than 235 square miles. The WCTS is composed of:

- 2,683 miles of sewers (approximate)
- 70,900 manholes (approximate)
- 64 LSs and force mains
- Two WWTFs

The WCTS is divided into three sewerbasins. Two sewerbasins deliver wastewater to the two WWTFs while the third basin delivers wastewater to neighboring jurisdictions for treatment.

Appendix A provides an organizational chart of DWM, and Appendix B shows a map of the County's WCTS delineated by sewerbasin.

2.2 Key Elements of the CAP

The key elements of the CAP are addressed individually as follows:

- Section 3 Capacity Certification Program
- Section 4 Capacity Analysis
- Section 5 Credit Tracking & Banking System

2.3 Definitions

For clarity and ease of understanding, definitions for the following terms are provided.

Capacity Request: Written submission of a request to DeKalb County for an allotment of sewer capacity.

Credit: One unit of flow equivalent.

Flow Reduction Factor: The ratio of flow removal to proposed flow increase.

Force Main: Sanitary sewer lines that operate under pressure due to pumping of sanitary wastewater at a lift station except for those sanitary sewer lines that serve a private lift station or a single structure or building.

SECTION 2

Fully Developed Dynamic Model: A dynamic hydraulic model officially authorized for use by the DeKalb County after it is certified by a professional engineer on the County's behalf as meeting the technical criteria and functions specified in the MCD and the Sub-Model Reports, and is supported by complete documentation of model development, calibration, validation/verification, sensitivity analysis, appropriate flow conditions, and operation, use, and maintenance procedures.

Gravity Sewer Line: A pipe that receives, contains, and conveys wastewater not normally under pressure, or head, but is intended to flow unassisted under the influence of gravity.

Illicit Connection: Any pipe, open channel, drain, or conveyance, whether on the surface or subsurface, that allows any direct or indirect non-stormwater discharge to the DeKalb County Municipal Separate Storm Sewer System (MS4) including, but not limited to any conveyances which allow any non-stormwater discharge including sewage, process wastewater, and wash water to enter the MS4, regardless of whether such pipe, open channel, drain, or conveyance has been previously allowed, permitted, or approved by a federal, state, or local law enforcement agency.

Infiltration: Defined by 40 CFR § 35.2005(b) (20) shall mean water other than wastewater that enters a WCTS (including sewer service connections and foundation drains) from the ground through such means as defective pipes, pipe joints, connections, or manholes.

Inflow: Defined by 40 CFR § 35.2005(b)(21) shall mean water other than wastewater that enters a sanitary sewer system (including sewer service connections) from source such as, but not limited to, roof leaders, cellar drains, yard drains, area drains, drains from springs and swampy areas, manhole covers, cross connections between storm sewers and sanitary sewers, catch basins, cooling towers, storm water, surface runoff, street wash waters, or drainage.

NPDES Permits: The most recently issued National Pollutant Discharge Elimination System Permits issued to the County for the Pole Bridge WWTF and the Snapfinger WWTF.

1-Hour Peak Flow: Per Paragraph 29 of the MCD, the 1-hour peak flow is the greatest flow in a sewer averaged for a 60-minute period at a specific location expected to occur as a result of a representative 2-year, 24-hour storm event.

Overflow: A release of wastewater from the WCTS, or from an WWTF, caused by problems in the WCTS, that does not reach waters of the United States or the state.

Priority Areas: Portions of the WCTS within Initial or Additional Priority Areas as defined and delineated in the July 2015 Priority Areas Sewer Assessment and Rehabilitation Program Report as referenced in Table 1-1 herein.

Priority Fix List: A listing of repeat SSO locations as defined in Section VI, Paragraph 35(j) of the Consent Decree as revised per the MCD.

Private Lateral: That portion of a sanitary sewer conveyance pipe, including that portion in the public right of way, that extends from the wastewater main to the single-family, multi-family, apartment or other dwelling unit or commercial or industrial structure to which wastewater service is or has been provided.

Sanitary Sewer Overflow or SSO: Spills, overflows, and building backups.

Sewershed: The subdivisions of the County's WCTS containing sewers that are primarily hydraulically linked as identified in Appendix A of the Consent Decree.

Spill: A discharge of wastewater from the WCTS, or from an WWTF caused by problems in the WCTS, which reaches waters of the United States or the State, including a prohibited bypass, but not including other discharges from a point source that is specified in the NPDES permits.

SECTION 2

2-year, 24-hour Flow Condition: The peak hourly flow from a rainfall event 24 hours in duration that has a 50 percent probability of occurring in any one year.

Wastewater Collection and Transmission Systems: All wastewater collection and transmission systems, including all pipes, lift stations, force mains, gravity sewer lines, manholes and appurtenances thereto, which are owned or operated by the County, except for those portions of a system or systems for which another entity is legally responsible for maintenance.

Wastewater Treatment Facility: Devices or systems used in the storage, treatment, recycling, and reclamation of municipal sewage. This definition includes the following facilities owned, managed, operated, and maintained by the County: the Pole Bridge WWTF and the Snapfinger WWTF.

SECTION 3

Capacity Evaluation Program

The CAP will analyze portions of the WCTS that are indicative of being hydraulically limited including: 1) identifying each sewerbasin or part of a sewerbasin with temporarily insufficient capacity under either 1-hour peak flows, or average conditions, or both; 2) analyzing the portions of the WCTS that hydraulically impact known SSOs; and 3) assessing the peak or average flow capacity of all major system components for existing and proposed flows.

The CAP provides a process for the County to determine whether there is adequate treatment, transmission, and collection capacity before it authorizes a new sewer service connection in the WCTS, or additional flow from an existing sewer service connection in the WCTS, as set forth in this section.

Appendix C provides a flowchart that provides an overview of the capacity evaluation process. The steps are further described throughout this section and the following sections of this document.

Certifications will be made by a professional engineer registered in the state of Georgia and reviewed and approved by an authorized representative of the County.

3.1 Capacity Request Submittal

An entity requesting connection to the WCTS, or an increase in flow, will be required to submit a Sewer Capacity Evaluation Request Form. The request will be submitted through the Planning & Development Division of DWM at the beginning stages of development. Appendix D provides an example Sewer Capacity Evaluation Request Form.

3.1.1 Flow Estimates for Additional Flows

Flow estimates shall be provided by the requestor and included in the Sewer Capacity Evaluation Request Form. Estimated flows from new sewer service connections or estimated increases in flow from existing sewer service connections shall be based upon the latest approved table of standard design flow rates which are included as an attachment to the County's Sewer Capacity Evaluation Request Form. Alternative flow contribution rates shall be considered with supporting information.

3.1.2 Other Required Information

Other information on the Sewer Capacity Evaluation Request Form shall include the following:

- Location Address
- Intended Tie-In Manhole
- Project Name
- Type of Development
- Land Lot and Parcel ID
- County District
- Developer Contact Information
- Engineering Firm Contact Information
- Geographic Information System (GIS) Site Plan
- Proposed Utility Plan (if available)

SECTION 3

Within 60 days of entry of the MCD, the County shall establish a list with detailed information of authorized new connections to the sewer system from date of entry of the MCD and increases in flow from existing connections from which the flows have not yet been introduced into the WCTS. The information shall include the address, average daily flow, peak flow, sewershed, Wastewater Treatment Facility (WWTF), date authorized, and estimated month/quarter when flow will begin.

3.2 Capacity Analysis Evaluation

DWM will perform the capacity analysis with the provided information from the Sewer Capacity Evaluation Request Form. The detailed process of performing this analysis is described in Section 4.

3.3 Issuance of Certifications

Upon approval of new connection or additional flow request, the County will provide the requestor with a completed Sewer Capacity Letter stating approval for connection. The date will be documented and updated in the County's tracking system.

3.4 Minor Sewer Connections

Minor sewer connections are defined in this CAP as connections in which the average daily flow is not to exceed 2,500 gpd. For minor sewer connections, the County may elect to perform a monthly capacity analysis for each sewershed or part of a sewershed to verify that the sewershed or part of a sewershed has adequate capacity as defined in Section 4 for all sewer connections approved in the previous month as well as for additional flows generated by all anticipated minor sewer connections in the subsequent month. The County shall evaluate proposed new minor connections on a monthly basis to certify adequate capacity for the total anticipated one-hour peak flow from all minor connections and shall include this anticipated one-hour peak flow in all capacity evaluations. The County will validate the prior month's flow estimate for anticipated minor sewer connections at the beginning of the following month and adjust capacity evaluations accordingly. If the County uses the credit bank described in Section 5 to approve any minor sewer connections, the subtraction from the credit bank shall not result in a negative balance of banking credits.

3.5 Capacity Approval In Lieu of Certification Process

The County may authorize new sewer service connections or additional flow from an existing connection even if it cannot satisfy the requirements of Section 3.2 and 3.3, provided the County complies with the following provisions and a Professional Engineer certifies and stamps, prior to the authorization, that all applicable provisions are satisfied:

- The County is in substantial compliance with the Consent Decree as modified by the MCD;
- The sewer lines that will convey the proposed additional flow from new or existing sewer service connections have not experienced dry weather SSOs resulting from inadequate capacity within the previous 12 months or the County has certified the causes of any dry weather SSOs due to inadequate capacity have been eliminated;
- The County has identified the sewer line segment(s), LS(s), and/or wastewater treatment systems that do not meet the conditions for certification of adequate treatment, transmission, or collection capacity; and

SECTION 3

- The County may authorize a new sewer service connection or increase in flow to an existing connection prior to the completion of a necessary added capacity or peak flow reduction project, but the project must be completed prior to the time that the new sewer service connection or flow increase is introduced to the WCTS (the credit tracking system is described in Section 5)

3.5.1 Essential Services

Notwithstanding the provisions of Section 3.2 and 3.3, the County may authorize a new sewer service connection, or additional flow from an existing sewer service connection, even if it cannot certify that it has adequate treatment, transmission, or collection capacity, for the following:

- health care facilities, public safety facilities, public schools, and, subject to EPA/EPD review and approval, government and other facilities
- cases where a pollution or health or safety condition exists, as determined by the DeKalb County Health Department or its regulatory successor, as the result of a discharge of untreated wastewater from an onsite septic system or other discharge point

For new service connections, or additions to flow from an existing connection, the County will make the appropriate subtraction to the balance in the credit bank described in Section 5. The subtraction may result in a negative balance in the credit bank if sufficient credits are not available to offset the flow increase.

3.5.2 Existing Illicit Connections

Notwithstanding the other provisions of Section 3, the County may authorize a new sewer service connection, or additional flow from an existing sewer service connection, even if it cannot certify that it has adequate treatment, transmission, or collection capacity for any illicit connections or discharge of wastewater to the stormwater system or to waters of the state. For such new service connections or additions to flow from an existing connection the County will make a subtraction from the balance in the credit bank described in Section 5. The subtraction may result in a negative balance in the credit bank if sufficient credits are not available to offset the flow increase.

3.6 Temporary Service Lateral Suspensions

The County may reconnect, without certifying Adequate Capacity, any connection that is temporarily suspended from the WCTS in order to complete work to replace or repair the service lateral. The term “temporarily suspended” as it applies to this section refers only to service lateral connections that are suspended while work is actively pursued to replace or repair the service lateral.

3.7 Issuance of Land Development or Building Permits

The County and City ordinances stipulate that a land development permit is required if any part of the development involves land disturbance, as well as a building permit is required for a new development and for redevelopment of an existing property. The permitting process requires a certification that the WCTS has adequate capacity or an approval in lieu of the certification as described in this Section in order to accept the development’s new sewer service connection or additional flow to an existing sewer service connection.

SECTION 4

Capacity Analysis

4.1 Methodology

The WCTS is divided into three major sewerbasins, which are further divided into 35 individual sewersheds. Three of the 35 sewersheds have no sewer service and thus the remaining 32 sewersheds are subject to capacity analysis. Appendix B presents a map of the sewersheds.

Two sewerbasins convey wastewater to County-operated WWTFs: Pole Bridge WWTF and Snapfinger WWTF, which are operated in accordance with their respective NPDES permits. The third sewerbasin conveys wastewater primarily to the City of Atlanta but to a lesser extent also to Clayton County, Fulton County, and Gwinnett County; discharge of this wastewater is governed by Intergovernmental Agreements, which dictate capacity analysis beyond the County's system.

4.1.1 Hydraulic Model

The above major sewerbasins were divided into seven modeling areas which are hydraulically independent and are shown in Appendix E. Fully developed dynamic models for each of these areas, which are herein described as Sub-Models, are to be completed using available collection system data that included survey data, existing GIS databases, record drawings, site visits, and engineering judgment and per the schedule and requirements set forth in Paragraph 28 of the MCD.

To calibrate each Sub-Model, the County conducted a system-wide flow and rainfall monitoring program. Model calibration consists of comparing model simulated output to monitored flow and adjusting model parameters until model simulated data correlated with measured data. The Sub-Models will be re-validated periodically and, if merited, re-calibrated as necessary to take into account updates to the WCTS.

The model will be used to simulate system response to a representative 2-year, 24-hour storm event and the results will be used to evaluate system capacity and provide a baseline for the credit banking system described in Section 5.

Sound engineering judgment shall be employed in the use of the hydraulic model and in the analysis of the model results for determining whether the WCTS has adequate capacity to authorize new sewer service connections, or increases in flow from existing sewer service connections.

4.1.2 System Flows

Rainfall data, diurnal flow patterns, and boundary conditions are incorporated into the hydraulic model. Based on flow monitoring results, dry- and wet-weather periods are identified. Dry-weather days were extracted from the flow survey data to calculate the average dry-weather flow (ADWF), which represents the average sewage loading that occurs on a daily basis. Wet-weather events were analyzed based on the system response and hydrologic characteristics associated with precipitation and the resulting runoff.

The model will be calibrated and validated for both dry- and wet-weather flow periods for reliability under both conditions.

SECTION 4

4.2 Collection Capacity Analysis

4.2.1 Procedure

Proposed increases in flow and additional connections to the existing WCTS will be entered into the hydraulic model to simulate the proposed flow scenario. A hydraulic model analysis will be performed using the InfoWorks ICM software for the design storm, and the hydraulic gradeline (HGL) will be developed. The HGL will be compared to target system capacity requirements to determine if the increase in flow will violate capacity assessment criteria. The model will predict locations of capacity deficits and the County can then address those areas. The analyses will include documentation and supporting information regarding model outputs and any necessary potential variations as well as consider real-world conditions and engineering judgment.

4.2.2 Collection Capacity Definition

Adequate collection capacity will require that every gravity sewer line in the WCTS, through which the proposed additional flow from new or existing connections would pass, has the capacity to carry the following flows without causing a surcharge condition. The analyses shall confirm that the following flow conditions do not cause surcharge:

- existing 1-hour peak flow passing through the gravity sewer line
- the addition to the existing 1-hour peak flow from the proposed connection
- the addition to the existing 1-hour peak flow predicted to occur from all other authorized sewer service connections that have not begun to discharge into the WCTS

For the purposes of this paragraph, a surcharge condition shall mean the condition that exists when the supply of wastewater resulting from the 1-hour peak flow is greater than the capacity of the pipes to carry it and the surface of the wastewater in manholes rises to an elevation greater than the top of the pipe. However, if the County has identified sewer line segments which have been specifically designed and constructed to operate under surcharge conditions and has identified the level of surcharge for those segments, the identified level of surcharge shall be used. Notwithstanding the immediately preceding sentence, any rise in elevation above the top of the pipe shall be considered a surcharge condition if the manhole has experienced a capacity-related SSO since December 20, 2017 (excluding those SSOs caused by severe natural conditions such as hurricanes, tornados, widespread flooding, earthquakes, and other similar natural conditions) unless the County can certify that the cause of the SSO has been corrected through improvements to the WCTS.

4.3 Transmission Capacity Analysis

4.3.1 Procedure

The design hydraulic capacities of each LS in the system are represented in the hydraulic model. Confirmation of the effective LS capacities are determined using flow monitoring data or performed through wet well drawdown tests. Appendix F shows sewer LS and force main locations. The analyses will include documentation and supporting information regarding model outputs and potential variations or adjustments as necessary and consider real-world conditions and engineering judgment.

SECTION 4

4.3.2 Transmission Capacity Definition

Adequate transmission capacity means that each LS through which the proposed additional flow from new or existing sewer service connections would pass to the WWTF has the capacity to transmit, with its largest pump out of service, the following flows:

- existing 1-hour peak flow passing through the LS
- the addition to the existing 1-hour peak flow predicted to occur from the proposed connection
- the addition to the existing 1-hour peak flow predicted to occur from all other authorized sewer service connections that have not begun to discharge into the WCTS

4.4 Treatment Capacity Analysis

4.4.1 Procedure

The Pole Bridge Basin flows to the Pole Bridge WWTF and the Snapfinger Basin drains to the Snapfinger WWTF. Treatment capacity will be analyzed to ensure that both facilities operate in accordance to their respective NPDES permits.

4.4.2 Treatment Capacity Definition

Adequate treatment capacity means that, at the time the WWTF receives the flow from a proposed sewer service connection(s) or increased flow from an existing sewer service connection(s), when combined with the flow predicted to occur from all other authorized sewer service connections (including those that have not begun to discharge into the WCTS), the WWTF will not be in “non-compliance” for quarterly reporting, as defined in 40 CFR Part 123.45, Appendix A.

4.5 New Connection Conditions

4.5.1 Procedure

The County may also authorize new sewer service connections or increases in flow from existing connections where the New Connection Conditions defined below are satisfied and where adequate transmission capacity and adequate treatment capacity is available as determined per Sections 4.3 and 4.4 above.

4.5.2 New Connection Conditions Definition

New Connection Conditions are defined by the following:

- The dynamic hydraulic model does not predict any overflows from the new sewer service connections and/or increases in flow from the existing sewer service connections
- The dynamic hydraulic model does not predict that, after adding the new sewer service connections and/or increases in flow from the existing sewer service connections to all existing and authorized sewer connections, the wastewater in any manhole from the 1-hour peak flow resulting from a representative 2-year, 24-hour storm event will rise to an elevation within two (2) feet of ground surface at any location in the WCTS through which the proposed additional flows from the new or

SECTION 4

existing connection would pass. However, for manholes within 350 feet of the entrance to or exit from aerial crossings (at locations including creeks, dry beds, stormwater ditches and conveyances, and intermittent and ephemeral streams) with less than two (2) feet of ground cover over their connecting pipes, the wastewater predicted as described above shall not rise to an elevation of within two (2) feet of the manhole rim.

- All capacity-related locations on the Priority Fix List downstream of the proposed new sewer service connection or proposed increase in flows from an existing sewer service connection have been adequately rehabilitated, relieved, fixed, or otherwise addressed (“Adequately Fixed”) and either:
 - At least one (1) year has passed since completion of such Adequate Fix without a capacity-related SSO occurring at any such location (excluding those SSOs caused by severe natural conditions such as hurricanes, tornados, widespread flooding, earthquakes, and other similar natural conditions)
 - Or, each such location has experienced a 2-year, 24-hour storm event (or a 24-hour storm event of greater size) without a capacity-related SSO
- Any location that has experienced a capacity-related SSO (excluding those SSOs caused by severe natural conditions such as hurricanes, tornados, widespread flooding, earthquakes, and other similar natural conditions) within the previous two (2) years downstream of the proposed new sewer service connection or proposed increase in flow from an existing sewer service connection has been adequately rehabilitated, relieved, fixed, or otherwise addressed (“Adequately Fixed”) and either:
 - At least one (1) year has passed since completion of such Adequate Fix without a capacity-related SSO occurring at any such location (excluding those SSOs caused by severe natural conditions such as hurricanes, tornados, widespread flooding, earthquakes, and other similar natural conditions)
 - Or, each such location has experienced a 2-year, 24-hour storm event (or a 24-hour storm event of greater size) without a capacity-related SSO

SECTION 5

Banking Credit System

As part of the Capacity Approval in Lieu of Certification Process described in Section 3.5, the County may use a “banking credit system” for the sewer line segment(s), LS(s), and/or WWTF for which the County is unable to certify adequate capacity.

The addition of sewer capacity and/or reduction in 1-hour peak flows from Capacity Enhancement Projects which are completed and in-use may be accumulated in the form of credits in the banking credit system in accordance with this document. The County may earn banking credits for phased Capacity Enhancement Projects, where permanent capacity is added to the WCTS from completion of a phase of such projects. For example, if a project has 10 phases, the County may earn banking credits upon completion of the first phase to the extent that permanent capacity is added to the WCTS based on that phase of the overall project. Credits from the banking credit system may then be used for authorization of new sewer service connections or increases in flow from existing connections within the hydraulically independent Sub-Model area where the project that earned the credits occurred.

The banking credit system may only be used after the County certifies to the EPA and EPD that the Information Management System described in Section 5.1 below is operational. Capacity Enhancement Projects completed after entry of the MCD may earn credits in the credit banking system as well as those Capacity Enhancement Projects completed after April 29, 2019.

5.1 Capacity Assurance Information Management System

The Capacity Assurance Program will utilize an information management system comprised of the County’s CityWorks Computerized Maintenance Management System, the GIS, and other software to track and report sewer capacity request information. Additionally, the information management system will manage the recording and reporting of earned banking credits and the subsequent expenditure of those credits.

As part of the documentation to the EPA and EPD certifying that the information management system is operational, the County will provide a representative report of the data recorded from sewer capacity requests and from the banking credit system for EPA and EPD review.

As the County implements the information management system, the County may develop additional software solutions to further streamline and automate recording and reporting of CAP information.

5.2 Deposits

Capacity improvement documentation will be completed to deposit credits from projects as described in this section into the banking credit system. The guidelines presented in Section 5.3 shall be used along with engineering judgment when depositing credits into the system.

Within 12 months following approval of the CAP, and annually thereafter as necessary, the County shall perform a review of specific Capacity Enhancement Projects to determine if actual added capacity and peak flow reductions are in line with the County’s original estimation for such projects. The County will use the results of this review to adjust future estimates as necessary.

SECTION 5

5.3 Capacity Enhancing Projects

5.3.1 Offline Storage

Offline storage projects will add capacity credits equal to the volume of the storage constructed unless the project is located within a Priority Area in which case the credit shall be equal to the volume of the storage constructed divided by a factor of 2.

5.3.2 Removal of Connections

Removal of connections may add capacity credits equal to the estimated flow that the connections previously produced unless the project is located within a Priority Area in which case the credit shall be equal to the estimated flow that the connections previously produced divided by a factor of 2.

5.3.3 Gravity Sewer Line Improvements

Gravity sewer line improvements will add capacity credits equal to the added capacity resulting from such projects divided by a factor of 3 unless the improvements are located within a Priority Area in which case the credit calculated shall be divided by a factor of 4. See Section 5.3.7.

5.3.4 LS Improvements

Lift Station (“LS”) improvement projects will add capacity credits equal to the volume of additional storage in the wet well. If the LS has been a restriction, then the County will analyze the increased LS capacity prior to including any additional system credits. If the LS improvement project is located within a Priority Area, the capacity credit calculated per above shall be divided by a factor of 2.

5.3.5 Treatment Facility Improvements

Treatment facility improvement projects will add capacity credits equal to the volume of additional storage available in the facility and/or equal to the additional discharged flow that meets the requirements of the current NPDES permit.

5.3.6 I/I Reduction Projects

The estimated flow reductions resulting from completion of I/I reduction projects will add capacity credits equal to the estimated amount of the flow reduction divided by a factor of 3 unless the project is located within a Priority Area in which case the estimated amount of flow reduction shall be divided by a factor of 4. See Section 5.3.7.

5.3.6.1 Rehabilitation of Gravity Sewers

The estimated rate of flow reduction will be determined based on Table 5-1 or actual flow data and/or engineering analysis dependent on the defects observed and the actual rehabilitation work to be completed.

SECTION 5

Table 5-1. Estimated Peak Flow Reductions for Gravity Sewer Rehabilitation

Rehabilitation Method	Earned Base Credits per inch-diameter-mile rehabilitated
Riparian Zone – Piping is within 50 feet horizontally of a stream or water body.	34,000 gpd
Non-riparian Area – Piping is not located within the Riparian Zone.	60 gpd

5.3.6.2 Storm Drain and Downspout Removal and Cleanout Cap Replacement

Depending on the location and size of the drain, the flow estimation can be either calculated using standard engineering practices or it can be estimated using the values from Table 5-2.

Table 5-2. Estimated Peak Flow Reductions for Storm Drain and Downspout Removal

Drain	Earned Base Credits per Drain Removed
Storm Drain <10" diameter	7,000 gpd
Storm Drain >10" diameter	To be calculated
Downspout	5,000 gpd
Cleanout Cap Replacement	250 gpd

5.3.6.3 Foundation Drain Pump Removal

Disconnecting foundation drain sump pumps from the WCTS is estimated to reduce peak flows by approximately 4,000 gpd per sump pump removed.

5.3.6.4 Replacement of Vented Manhole Lids

Table 5-3 lists the base credits for vented manhole lid replacement prior to the factor reductions.

Table 5-3. Estimated Peak Flow Reductions for Vented Manhole Lid Replacement

Manhole Location	Earned Base Credits
Riparian Zone – Manhole is within 50 feet horizontally of a stream or water body. Manhole is assumed to be subject to 1 inch of inundation if located within the riparian zone.	40,000 gpd
Paved Area – Manhole is located in a paved, curbed area at a distance from the curb that is less than one-fourth of the total roadway width. Manhole is assumed to be subject to one-eighth of an inch inundation if located within the paved area.	9,000 gpd
Non-riparian Area – Manhole does not fall into one of the other categories listed above but are flush with the ground surface is assumed to be subject to "splash" conditions.	2,500 gpd

5.3.6.5 Repair of Manhole Defects

Table 5-4 provides the base credits for manhole defect repair prior to the factor reductions.

SECTION 5

Table 5-4. Earned Base Credits for Repair of Manhole Defects (in gpd)

Manhole Component	Minor I/I			Moderate I/I			Heavy I/I			Severe I/I		
	R	P	N	R	P	N	R	P	N	R	P	N
Frame Seal	864	78	328	1,728	156	656	3,456	311	1,313	6,912	622	2,626
Chimney	864	78	328	1,728	156	656	3,456	311	1,313	6,912	622	2,626
Cone	864	78	328	1,728	156	656	3,456	311	1,313	6,912	622	2,626
Wall	432	39	164	864	75	328	1,728	156	656	3,456	311	1,313
Pipe Seal	432	39	164	864	75	328	1,728	156	656	3,456	311	1,313
Bench	432	39	164	864	75	328	1,728	156	656	3,456	311	1,313
Channel	432	39	164	864	75	328	1,728	156	656	3,456	311	1,313

Source: Adapted from Table 4-1 of The American Society of Civil Engineers, Manual of Practice No. 92

Notes:

R = Riparian

P = Paved

N = Non-riparian

5.3.7 Conditional Reduction in Banking Credit Ratios Used for Gravity Sewer Line Improvement and I/I Reduction Projects

Upon the County's timely completion of its obligation to adequately fix 50% of the Priority Fix List locations identified in Appendix F to the MCD (within two (2) years from the Date of Entry of the MCD), the banking credit ratios provided in Sections 5.3.3 and 5.3.6 (above) will be adjusted for gravity sewer line improvement projects and for I/I reduction projects. The banking credit ratios will be adjusted, as follows:

- Gravity sewer line improvements (Section 5.3.3 above) will add capacity credits equal to the added capacity resulting from such projects divided by a factor of 2 unless the improvements are located within a Priority Area in which case the credit calculated shall be divided by a factor of 3.
- The estimated flow reductions resulting from completion of I/I reduction projects (Section 5.3.6 above) will add capacity credits equal to the estimated amount of the flow reduction divided by a factor of 2 unless the project is located within a Priority Area in which case the estimated amount of flow reduction shall be divided by a factor of 3.

In the event that the County fails to meet any deadline for adequately fixing any Priority Fix List location, as provided in Paragraph 35(j) of the MCD, the banking credit ratios for gravity sewer line improvement projects and for I/I reduction projects will revert to the ratios provided for in Sections 5.3.3 and 5.3.6.

5.4 Capacity Approvals In Lieu of Capacity Certification

For new or additional flow contributions from sewer service connections that have been authorized in lieu of capacity certification, capacity credits equal to the estimated amount of the proposed new or additional flow will be withdrawn from the credit banking system balance at the time of authorization. The Capacity Approval In Lieu of Capacity Certification process is further described in Section 3.5.

SECTION 6

References

American Petroleum Institute (API). 2009. *Piping Inspection Code: In-service Inspection, Rating, Repair, and Alteration of Piping Systems (API 570)*. February.

American Society of Civil Engineers (ASCE). 2009. *Manual of Practice No. 92 Manhole Inspection and Rehabilitation*. August 12.

DeKalb County Department of Watershed Management. 2017. *Design Standards Manual: Potable Water Main, Gravity Sanitary Sewer, Sanitary Sewer Pumping Station and Force Main Design Standards*.

Hughes, John. 2009. *Manhole Inspection and Rehabilitation (ASCE Manuals and Reports on Engineering Practices No. 92)*. July 1.

Meyer, Jack. M. Neenah Foundry Company. 1976. *A Report on Inflow of Surface Water Through Manhole Covers*.

National Association of Corrosion Engineers (NACE). 2010. *Pipeline External Corrosion Direct Assessment Methodology (ANSI/NACE SP0502)*. June 24.

National Association of Sewer Service Companies (NASSCO). 2018. *Pipeline Assessment & Certification Program (PACP) v7.0.3*.

Wastewater Committee of the Great Lakes--Upper Mississippi River Board of State and Provincial Public Health and Environmental Managers. 2014. *Recommended Standards for Wastewater Facilities (Ten States Standards)*.

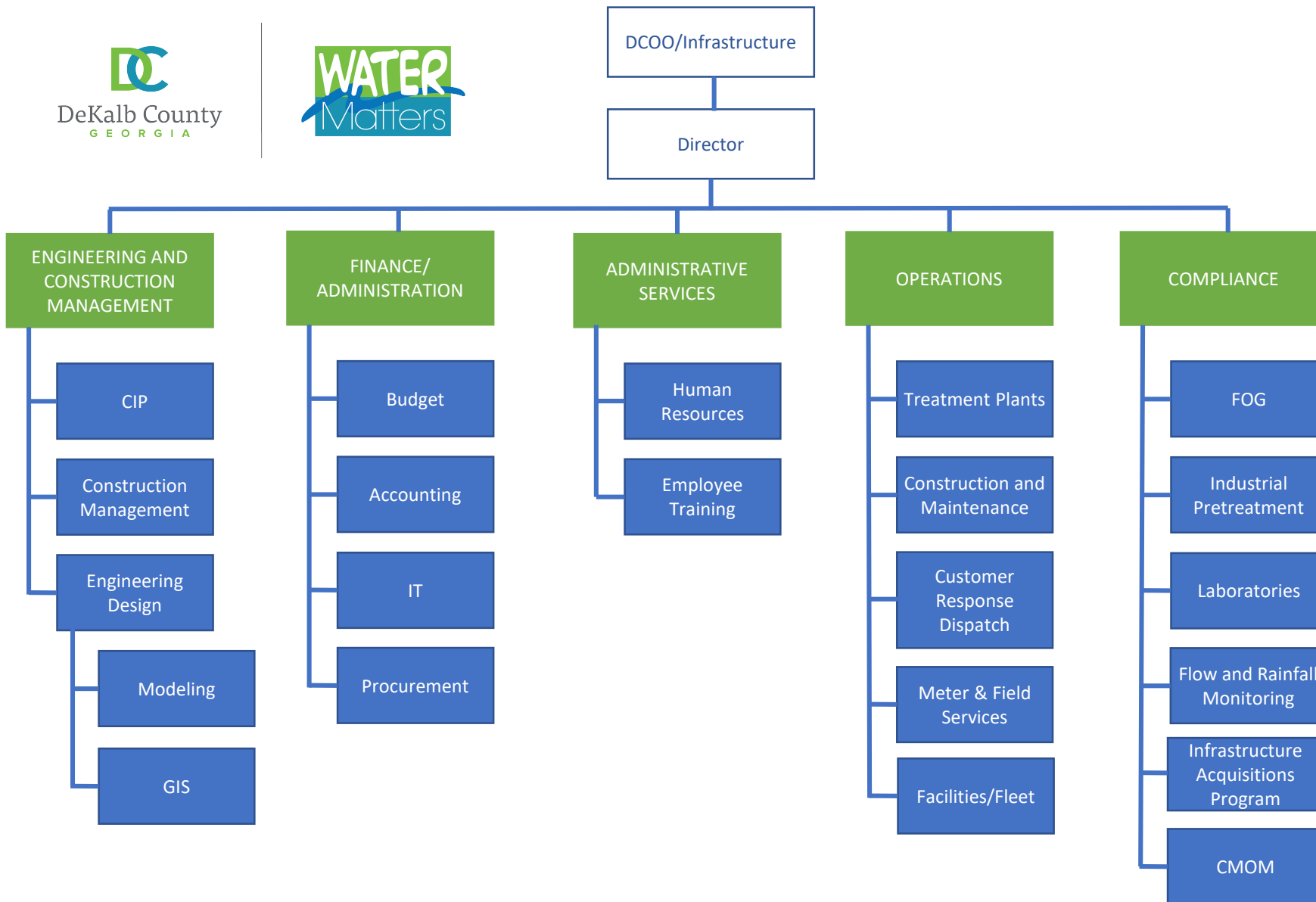
Water Environment Federation (WEF). 1993. *Design of Wastewater and Stormwater Pumping Stations (Manual of Practice FD-4)*. January.

Water Environment Federation (WEF). 2013. *Guide for Municipal Wet Weather Strategies*. July 22.

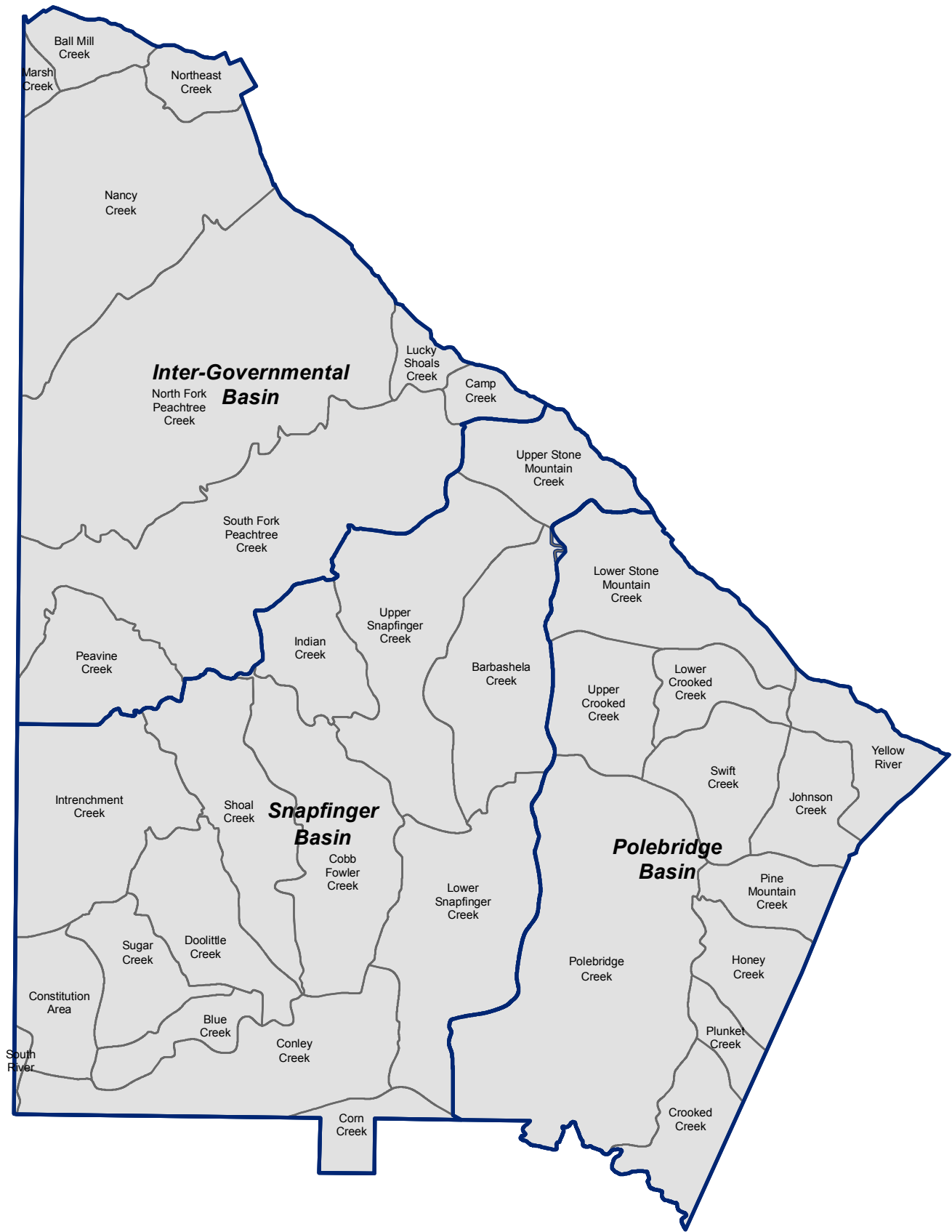
Water Environment Research Foundation (WERF). 2010. *Inspection Guidelines for Wastewater Force Mains 04-CTS-6URa*.



Appendix A
Department Watershed Management
Organizational Chart

DEPARTMENT OF WATERSHED MANAGEMENT ORGANIZATION CHART





Appendix B Sewerbasin Map

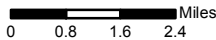


Legend
 Basin
 Sewersheds


Appendix B - Sewerbasin Map

DeKalb County
 GEORGIA

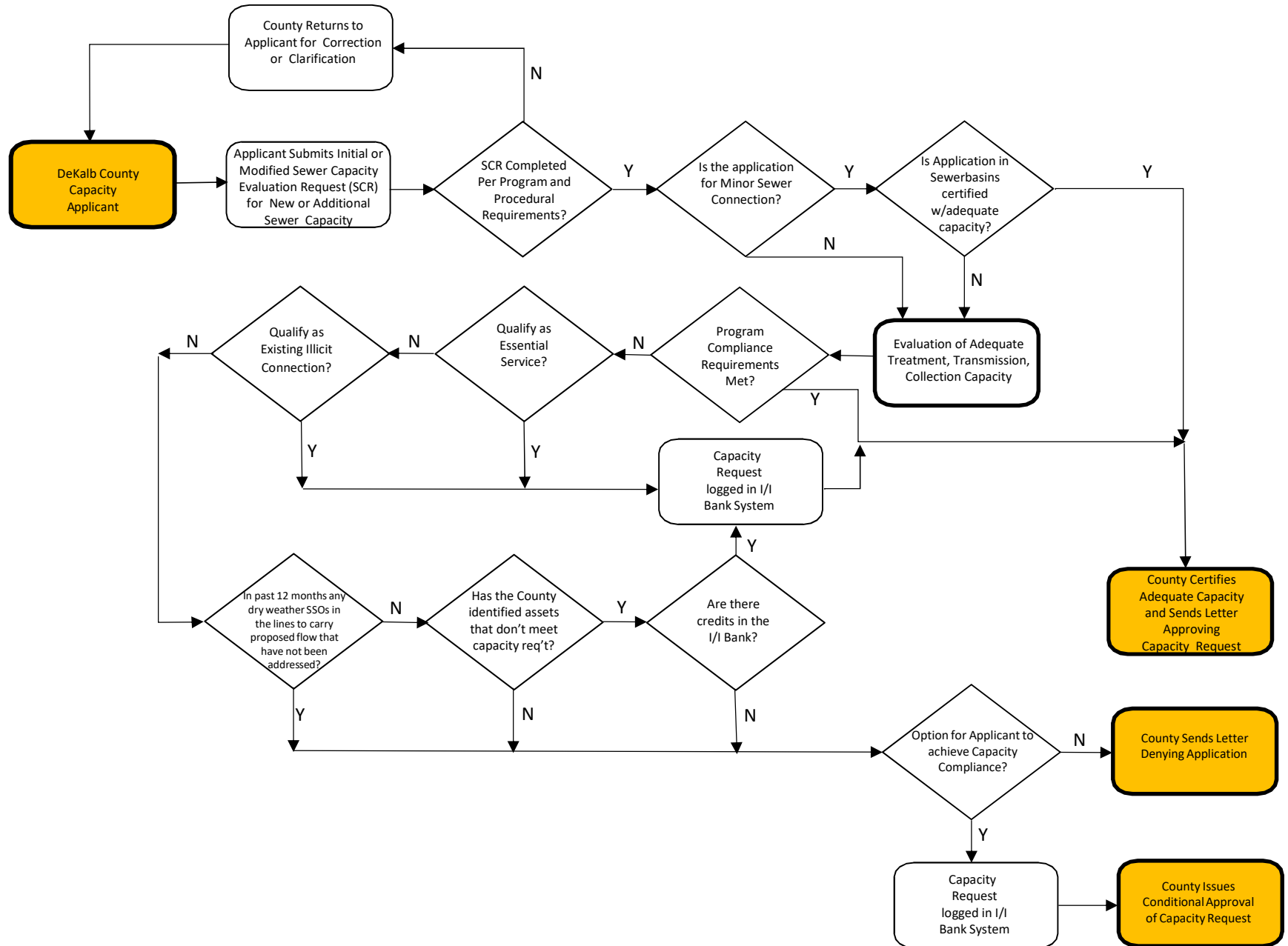


0 0.8 1.6 2.4 Miles



Appendix C
Capacity Evaluation Process Flowchart

Sanitary Sewer Capacity Protocol Flow Chart



Appendix D
Sewer Capacity Evaluation
Request Form



SEWER CAPACITY EVALUATION REQUEST

Department of Watershed Management

Project Information:

Project Address: _____ _____ <i>(City, State, Zip Code)</i>	Project Name: _____
Intended Tie-In Manhole: _____	Type of Development: _____ <i>(Private or Government)</i>
Total Peak Flow Requesting: _____ GPI <i>(Calculated Peak Flow - Existing Peak Flow)</i>	Land Lot and Parcel ID: _____
	County District: _____

Developer's Information:

Company's Name: _____	Address: _____
Contact Name: _____	City, State, Zip Code: _____
Phone Number: _____	Email Address: _____

Engineering Firm's Information:

Company's Name: _____	Address: _____
Contact Name: _____	City, State, Zip Code: _____
Phone Number: _____	Email Address: _____

Please include the following items in your submittal package:

- Proposed Peak Daily Flow Calculation based on attached guidelines *(See Appendix A)*
 - Existing Developments
 - New Conditions
- Separate detailed calculation sheet signed by the owner or owner's representative for each project *(See Appendix B)*
- Estimate of anticipated peak hour flow and instantaneous peak hour flow for each industrial, commercial, and mixed-use project, and for each residential project that is over four stories in height
- Geographical Information System (GIS) map clearly showing the proposed site (s) surrounds areas, and utilities
- Proposed utility plan, if available

Name: _____	Date: _____
Signed: _____	

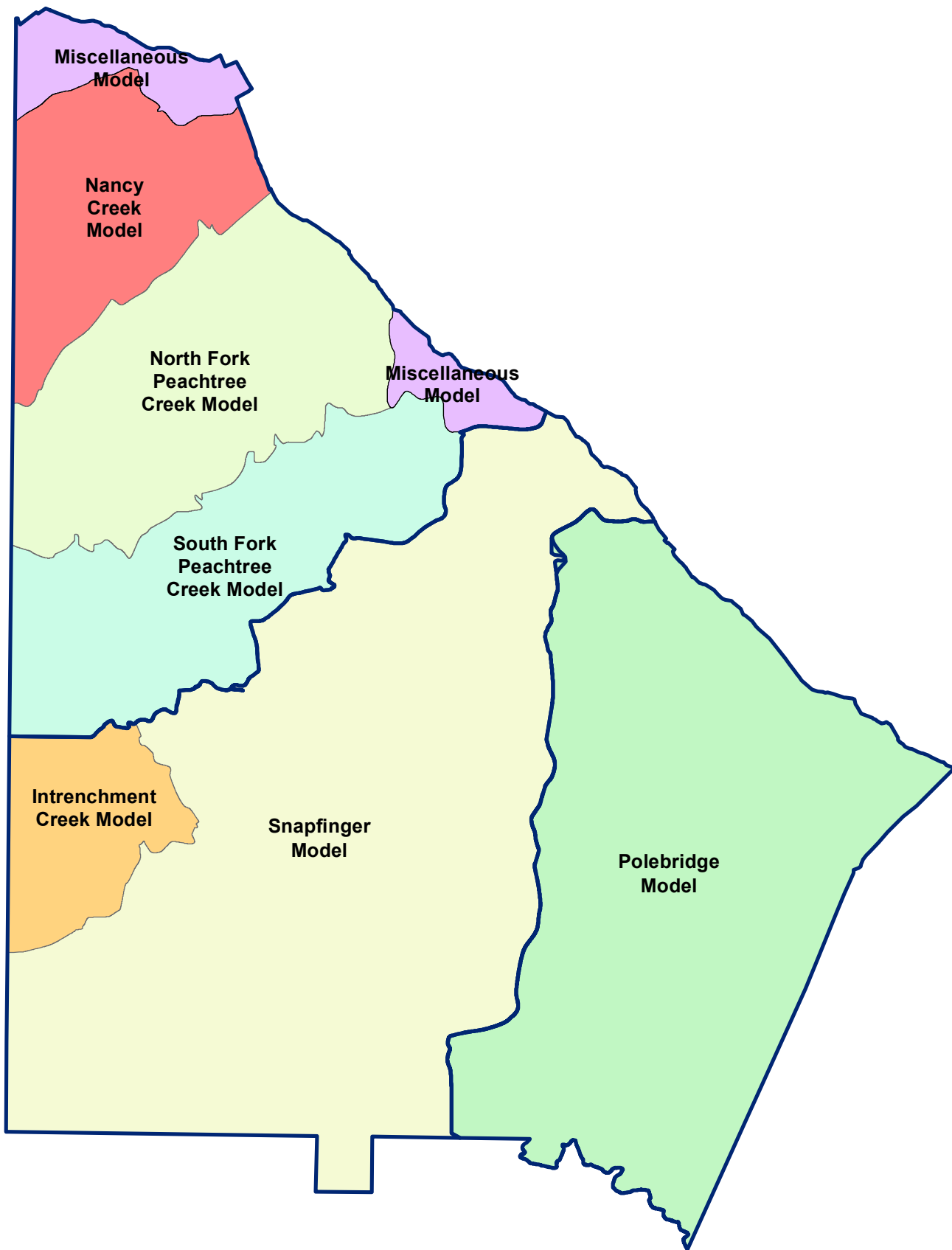
Capacity Evaluation Request will not be accepted until form is fully completed and all supplemental information is attached. Once Capacity Request Package has been reviewed and accepted by our internal staff, a letter will be completed within 60 days.

Internal Use Only

Date Capacity Request Reviewed and Accepted: _____	Received By: _____
	Signed: _____

Appendix E

Modeling Area Map



Legend
Basin

Appendix E - Modeling Area Map

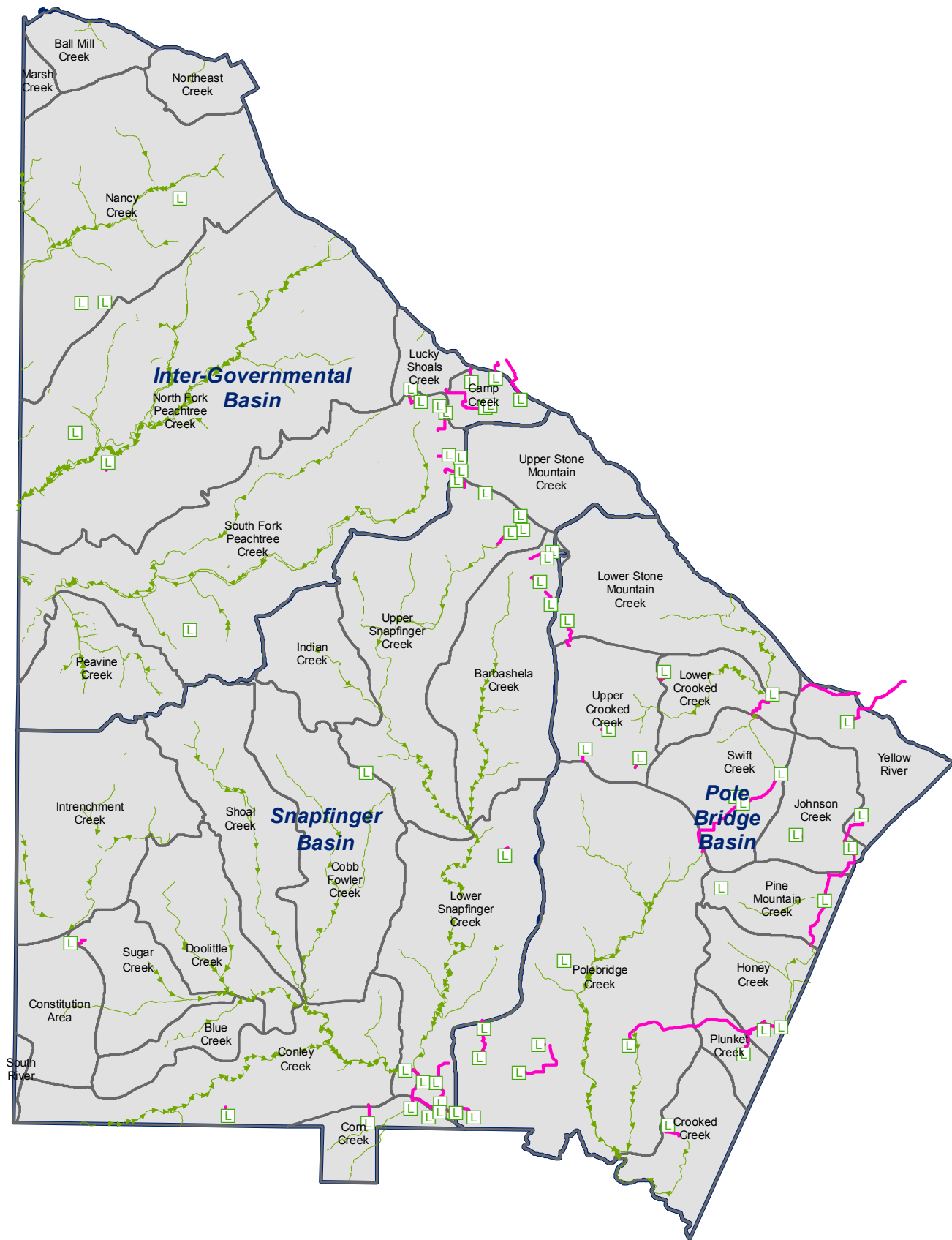
DC
DeKalb County
GEORGIA

WATER
Matters






0 0.8 1.6 2.4 Miles




Appendix F
Sewer Lift Station and
Force Main Map



Appendix F - Sewer Lift Station Map

-  Lift Stations
-  Gravity Mains >= 15"
-  Force Mains
-  Sewersheds
-  Basins

DeKalb County
GEORGIA

0 0.8 1.6 2.4 Miles

N

APPENDIX E TO CONSENT DECREE MODIFICATION

Initial and Additional Priority Areas:

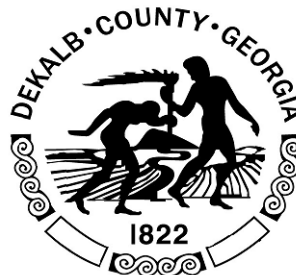
Certain Definitions, Minimum Linear Footage, and Projects to be Completed by December 31, 2021

Submitted to

U.S. Environmental Protection Agency
Georgia Environmental Protection Division

Submitted by

Department of Watershed
Management
DeKalb County, Georgia



Case No. 1:10 cv 4039-SDG

September 2020

APPENDIX E TO CONSENT DECREE MODIFICATION

Initial and Additional Priority Areas:

Certain Definitions, Minimum Linear Footage, and Projects to be Completed by December 31, 2021

Part 1 – Definitions

For clarity and ease of understanding, definitions for the following terms are provided.

Project Categories: The four project categories of “Simple Pipe Review,” “Simple Pipe Rehabilitation,” “Complex Pipe Design,” and “Complex Pipe Rehabilitation.”

Simple Pipe Review: Visual review of pipeline assessment certification program coded closed circuit television video and development of Simple Pipe Rehabilitation recommendations to address severe defects noted during condition assessment.

Simple Pipe Rehabilitation: Sewer rehabilitation to address structural issues identified during Simple Pipe Review. This can include point repairs, pipe lining, same size pipe replacement, and manhole lining.

Complex Pipe Design: Process to determine how to address capacity limitations within the WCTS, utilizing the hydraulic model and growth projections, among other tools, to determine the extent of comprehensive rehabilitation needed to reduce I/I alone or in conjunction with adding capacity through increasing pipe conveyance capacity or adding storage. Design may include any permitting, land/easement acquisition, surveying, geotechnical studies, equipment acquisition, engineering plans, etc.

Complex Pipe Rehabilitation: Sewer rehabilitation that addresses capacity issues within the system. This can be addressed through comprehensive rehabilitation to reduce I/I through pipe lining, point repairs, same size pipe replacement, manhole lining, vented manhole lid replacement, cleanout replacement, lateral connection rehabilitation and lower lateral lining/replacement. In conjunction with comprehensive rehabilitation or alone, capacity relief projects can be constructed including pipe upsizing, construction of new relief sewers, or inline or offline storage.

Minimum Linear Footage of Pipe Review, Design, and Rehabilitation: Minimum amount of linear footage to be (a) reviewed for a Simple Pipe Review project, (b) designed for a Complex Pipe Design project, or (c) rehabilitated for a Simple Pipe Rehabilitation or Complex Pipe Rehabilitation as those Project Categories are listed in Table E-1 of this Appendix E. The initial estimate of the minimum amount of linear footage to be completed in the Project Categories specified in Table E-1 of this Appendix E along with each corresponding year shall be used to determine compliance, notwithstanding a difference with the actual footage after project completion.

Part 2 – Minimum Linear Footage Interim Milestones

Table E-1. Interim Milestone Dates, Minimum Linear Footage by Year¹				
Year	Simple Pipe Review	Simple Pipe Rehabilitation	Complex Pipe Design	Complex Pipe Rehabilitation
2019/2020	80,000	60,000	80,000	40,000
2021	700,000	325,000	20,000	18,000
2022	50,000	200,000	45,000	20,000
2023	15,000	110,000	50,000	35,000
2024	10,000	60,000	40,000	45,000
2025	-	50,000	25,000	40,000
2026	-	40,000	10,000	25,000
2027	-	10,000	-	15,000

¹ Additional linear footage of rehabilitation work of a particular Project Category completed in a given calendar year beyond the minimum requirement for that particular calendar year shall be counted toward the subsequent year or years.

Part 3 – Projects to be Completed by December 31, 2021

Table E-2. Simple Pipe Review & Complex Pipe Design Summary Through December 31, 2021				
Task No.	Finish²	Description	Approximate Simple LF	Approximate Complex LF
1	2019	2438 Kings Court (PASARP SSO) (DB 2)	697	-
2	2019	I-IG11 (DB 2)	1,821	-
3	2019	2860 Buford Highway (OSARP SSO) (DB 2)	1,192	-
4	2019	2737 Winding Lane (PASARP SSO) (DB 2)	1,838	-
5	2019	408 South Susan Creek Drive (OSARP SSO) (DB 2)	884	-
6	2019	Jolly Avenue (OSARP SSO) (DB 2)	687	-
7	2019	108 East Ponce DeLeon (OSARP SSO) (DB 2)	771	-
8	2019	Pole Bridge 7 (DB 1)	-	597
9	2019	2692 Caladium Drive (DB 1)	689	1,826
10	2019	Pole Bridge 6 (DB 1)	-	521
11	2020	I-IG10 (DB 2)	5,444	125
12	2020	2659 Mill Court (PASARP SSO) (DB 2)	1,376	-
13	2020	5139 North Peachtree Road (OSARP SSO) (DB 2)	1,230	-
14	2020	Valley View (CIP Project) (DB 2)	499	1,396
15	2020	Lindsey Drive (DB 1)	151	-
16	2020	Pole Bridge 8 (DB 1)	-	3,596
17	2020	1576 Nantahalla Court (EPA) (DB 3)	328	-
18	2020	608 S McDonough Street (DB 3)	3,497	897
19	2020	A-IG2 (DB 2)	6,953	2,872
20	2020	1676 Frazier Road (DB 1)	718	-
21	2020	1760 Mason Mill Road (OSARP SSO) (DB 2)	339	2,473
22	2020	3924 Roman Court (DB 1)	1,057	-
23	2020	3597 Sunderland Circle, 1083 Wimberly Rd, A-IG4 (EPA, OSARP SSO) (DB 3)	4,660	-
24	2020	2312 Clairmont Rd, A-IG6 (EPA) (DB 3)	2,177	-

² Estimate based on currently available information. See also, Footnote #1 above.

Table E-2. Simple Pipe Review & Complex Pipe Design Summary Through December 31, 2021				
Task No.	Finish²	Description	Approximate Simple LF	Approximate Complex LF
25	2020	A-IG6 (DB 3)	9,438	670
26	2020	215 Beaumont Avenue (EPA) (DB 3)	724	1,608
27	2020	Package 6 Complex	-	7,221
28	2020	Pole Bridge 4 (DB 1)	-	760
29	2020	Package 8 Complex	-	15,886
30	2020	4367 Buford Highway (DB 1)	667	-
31	2020	Package 7 Complex	-	30,530
32	2020	121 Lucerne Street (DB 1)	454	-
33	2020	ASF1 (DB 1)	11,668	2,192
34	2020	Pole Bridge 1 (DB 1)	-	11,526
35	2020	Snapfinger Woods Dr (OSARP SSO) (DB 3)	-	10,421
36	2020	854 Sheppard Rd, A-SF2 (OSARP SSO) (DB 3)	112	-
37	2020	Nancy Creek Branch 2 (DB 2)	-	6,198
38	2020	Package 5	80,000	42,671
39	2020	In-house review / rehab recommendation	700,000	-
40	2020	161 Hood Circle (DB 1)	-	2,997
41	2020	Nancy Creek Branch 1 (DB 2)	249	9,415
42	2021	A-SF7 (DB 2)	3,889	4,656
43	2021	A-SF2 (DB 3)	7,482	-
Total Footage to be Designed by 12/31/2021			851,691	161,054

Table E-3. Construction Through December 31, 2021				
Task No.	Finish³	Description	Approximate Simple LF	Approximate Complex LF
1	2019	2438 Kings Court (PASARP SSO) (DB 2)	697	
2	2019	I-IG11 (DB 2)	1,821	-
3	2019	2860 Buford Highway (OSARP SSO) (DB 2)	1,192	-
4	2019	2737 Winding Lane (PASARP SSO) (DB 2)	1,838	-
5	2019	408 South Susan Creek Drive (OSARP SSO) (DB 2)	884	-
6	2019	Jolly Avenue (OSARP SSO) (DB 2)	687	-
7	2019	108 East Ponce DeLeon (OSARP SSO) (DB 2)	771	-
8	2020	Pole Bridge 7 (DB 1)	-	597
9	2019	2692 Caladium Drive (DB 1)	689	1,826
10	2019	Pole Bridge 6 (DB 1)	-	521
11	2020	I-IG10 (DB 2)	5,444	125
12	2020	2659 Mill Court (PASARP SSO) (DB 2)	1,376	-
13	2020	5139 North Peachtree Road (OSARP SSO) (DB 2)	1,230	-
14	2020	Valley View (CIP Project) (DB 2)	499	1,396
15	2020	Lindsey Drive (DB 1)	151	-
16	2019	Pole Bridge 8 (DB 1)	-	3,596
17	2020	1576 Nantahalla Court (EPA) (DB 3)	328	-
18	2020	608 S McDonough Street (DB 3)	3,497	897
19	2020	A-IG2 (DB 2)	6,953	2,872
20	2019	1676 Frazier Road (DB 1)	718	-
21	2020	1760 Mason Mill Road (OSARP SSO) (DB 2)	339	2,473
22	2019	3924 Roman Court (DB 1)	1,057	-
23	2020	3597 Sunderland Circle, 1083 Wimberly Rd, A-IG4 (EPA, OSARP SSO) (DB 3)	4,660	-
24	2020	2312 Clairmont Rd, A-IG6 (EPA) (DB 3)	2,177	-
25	2020	A-IG6 (DB 3)	9,438	670

³ Estimate based on currently available information. See also, Footnote #1 above.

Table E-3. Construction Through December 31, 2021				
Task No.	Finish³	Description	Approximate Simple LF	Approximate Complex LF
26	2020	215 Beaumont Avenue (EPA) (DB 3)	724	1,608
27	2019	Pole Bridge 4 (DB 1)	-	760
28	2019	4367 Buford Highway (DB 1)	667	-
29	2020	121 Lucerne Street (DB 1)	454	-
30	2019	ASF1 (DB 1)	11,668	2,192
31	2019	Pole Bridge 1 (DB 1)	-	5,526
32	2021	Snapfinger Woods Dr (OSARP SSO) (DB 3)	-	9,421
33	2020	854 Sheppard Rd, A-SF2 (OSARP SSO) (DB 3)	112	-
34	2021	Nancy Creek Branch 2 (DB 2)	-	6,198
35	2020	161 Hood Circle (DB 1)	-	2,997
36	2021	Nancy Creek Branch 1 (DB 2)	249	9,415
37	2021	A-SF7 (DB 2)	3,889	4,656
38	2021	A-SF2 (DB 3)	7,482	-
39	2020	Package 9 (AWS - Contractor 1)	81,996	-
40	2020	Package 9 (AWS - Contractor 2)	7,493	-
41	2020	Package 9 (AWS - Contractor 2 CO)	82,897	-
42	2021	Package 9 (Co-op #1)	73,392	-
43	2021	Package 9 (Co-op #2)	67,222	-
Total Footage to be Constructed by 12/31/2021			384,691	57,746

APPENDIX F TO CONSENT DECREE MODIFICATION

Priority Fix List

Submitted to

U.S. Environmental Protection Agency
Georgia Environmental Protection Division

Submitted by

Department of Watershed
Management
DeKalb County, Georgia



Case No. 1:10 cv 4039-SDG

September 2020

APPENDIX F TO CONSENT DECREE MODIFICATION

Table 1. Priority Fix List (PFL)

PFL Site #	Address	Capacity Related (Yes/No)	Priority Area	Sub-Model Area
1	1078 BEECH HAVEN ROAD	Yes	N/A	North Fork Peachtree Creek
2	125 BEAUMONT AVENUE	No	N/A	South Fork Peachtree Creek
3	1313 STONE MILL WAY	No	N/A	Snapfinger
4	1433 DEERWOOD DRIVE, DECATUR	Yes	I-SF3	Snapfinger
5	1440 SOWELL ESTATE	Yes	N/A	South Fork Peachtree Creek
6	1462 LIVELY RIDGE ROAD	No	I-IG16	South Fork Peachtree Creek
7	1496 COUNTRY SQUIRE DRIVE, DECATUR	Yes	I-IG13	South Fork Peachtree Creek
8	157 HOOD CIRCLE	Yes	A-SF6	Intrenchment Creek
9	1600 AUTUMN HURST COURT	No	N/A	Snapfinger
10	161 HOOD CIRCLE	Yes	A-SF6	Intrenchment Creek
11	1615 MELANIE COURT	Yes	I-SF3	Snapfinger
12	1707 CHILDERLEE LANE	Yes	N/A	North Fork Peachtree Creek
13	1787 WHITEHALL FOREST COURT	No	A-SF9	Snapfinger
14	1942 EAST STARMOUNT WAY	Yes	N/A	Intrenchment Creek
15	1964 EAST STARMOUNT WAY	Yes	N/A	Intrenchment Creek
16	1970 EAST STARMOUNT WAY	Yes	N/A	Intrenchment Creek
17	2052 GRAND PRIX DRIVE	Yes	I-IG14	North Fork Peachtree Creek
18	2060 KEHELEY DRIVE	Yes	N/A	Intrenchment Creek
19	2089 GARDEN CIRCLE	Yes	N/A	Intrenchment Creek
20	2301 MOUNTAIN INDUSTRIAL BLVD	No	N/A	South Fork Peachtree Creek
21	2480 MIRIAM LANE	Yes	I-SF3	Snapfinger
22	2562 TILLY MILL ROAD	Yes	I-IG2	Nancy Creek
23	2804 MILLWOOD WAY, DECATUR	Yes	I-IG13	South Fork Peachtree Creek
24	2967 HENDERSON MILL ROAD	No	N/A	North Fork Peachtree Creek
25	307 2ND AVENUE	Yes	A-SF6	Intrenchment Creek
26	3075 THRASHER CIRCLE, DECATUR	Yes	I-SF3	Snapfinger
27	3230 BORING ROAD, DECATUR	Yes	I-SF2	Snapfinger
28	3330 NORTHLAKE PARKWAY	No	I-IG12	North Fork Peachtree Creek
29	3433 BROOKFIELD LANE, DECATUR	Yes	I-SF2	Snapfinger
30	3449 BROOKFIELD LANE, DECATUR	Yes	I-SF2	Snapfinger
31	3488 KESWICK DRIVE	No	A-IG3	Nancy Creek
32	3496 PANTHERSVILLE ROAD, DECATUR	Yes	N/A	Snapfinger
33	3540 BUFORD HIGHWAY	No	A-IG5	North Fork Peachtree Creek

PFL Site #	Address	Capacity Related (Yes/No)	Priority Area	Sub-Model Area
34	3831 EAST AVENUE	No	A-SF1	Snapfinger
35	3892 BUFORD HIGHWAY	No	A-IG5	North Fork Peachtree Creek
36	3924 ROMAN COURT, TUCKER	Yes	N/A	South Fork Peachtree Creek
37	3954 MEMORIAL COLLEGE AVENUE	No	N/A	Snapfinger
38	4004 GLADESWORTH LANE	No	I-SF2	Snapfinger
39	4075 MEMORIAL DRIVE	No	I-SF2	Snapfinger
40	4124 FLAKES MILL ROAD, ELLENWOOD	Yes	N/A	Snapfinger
41	4347 FLAT SHOALS PARKWAY	Yes	I-SF2	Snapfinger
42	4437 WESLEYAN POINTE, DECATUR	Yes	N/A	Snapfinger
43	4557 MEADOW CREEK PATH, LITHONIA	Yes	N/A	Snapfinger
44	4664 FLAT BRIDGE ROAD, LITHONIA	No	N/A	Pole Bridge
45	4776 SNAPFINGER WOODS DRIVE	No	N/A	Snapfinger
46	4900 CENTRAL DRIVE	No	N/A	Snapfinger
47	4905 WIND COVE COURT	No	N/A	Snapfinger
48	5459 BUNKY WAY, DUNWOODY	No	N/A	Miscellaneous
49	5726 SOUTHLAND DRIVE	No	A-PB1	Pole Bridge
50	583 RAYS ROAD	No	N/A	Snapfinger
51	607 3RD AVENUE	Yes	A-SF6	Intrenchment Creek
52	608 SOUTH MCDONOUGH STREET, DECATUR	Yes	I-SF3	Snapfinger
53	6545 SWIFT CREEK DRIVE, LITHONIA	No	N/A	Pole Bridge
54	6591 TRIBBLE STREET	No	N/A	Pole Bridge
55	101 GREEN STREET	Yes	I-SF3	Snapfinger
56	1580 ROADHAVEN DRIVE	No	N/A	South Fork Peachtree Creek
57	1635 SUGAR DOWNS COURT	No	N/A	Snapfinger
58	1831 BRIARCLIFF CIRCLE	No	A-IG5	North Fork Peachtree Creek
59	217 GREEN STREET	Yes	I-SF3	Snapfinger
60	2190 MEADOWCLIFF DRIVE	No	A-IG5	North Fork Peachtree Creek
61	2396 MIRIAM LANE	No	I-SF3	Snapfinger
62	3546 STANFORD CIRCLE	No	N/A	Snapfinger
63	3731 BUFORD HIGHWAY	No	A-IG5	North Fork Peachtree Creek
64	4980 HAMMERMILL ROAD	No	N/A	South Fork Peachtree Creek
65	8304 UNION GROVE ROAD	No	A-PB3	Pole Bridge
66	1397 WITHAM DRIVE	No	N/A	Miscellaneous
67	1430 COUNTRY SQUIRE DRIVE	Yes	I-IG13	South Fork Peachtree Creek
68	2005 BENCAL DRIVE	Yes	N/A	Intrenchment Creek
69	2311 DUNWOODY CROSSING	No	N/A	Nancy Creek
70	294 PINE TREE CIRCLE	No	N/A	Snapfinger

PFL Site #	Address	Capacity Related (Yes/No)	Priority Area	Sub-Model Area
71	3360 MOUNTAIN DRIVE	No	N/A	Snapfinger
72	3408 MILL CREEK ROAD	No	A-IG4	Nancy Creek
73	3528 MISTY VALLEY ROAD	Yes	I-SF2	Snapfinger
74	3643 GLENWOOD ROAD	No	I-SF3	Snapfinger
75	3724 EAGLES BEEK CIRCLE	No	N/A	Snapfinger
76	4203 CLEVEMONT ROAD	No	N/A	Snapfinger
77	4495 VILLAGE SPRING RUN	No	N/A	Nancy Creek
78	4711 BISHOP MING BLVD	No	N/A	Snapfinger
79	506 SOUTH MCDONOUGH STREET	Yes	I-SF3	Snapfinger
80	5083 BIFFLE ROAD	No	N/A	Snapfinger
81	6701 PEACHTREE INDUSTRIAL BLVD	No	N/A	Nancy Creek
82	2902 MOUNT OLIVE DRIVE	No	I-IG17	South Fork Peachtree Creek
83	1410-1416, 1422 COBB BRANCH DRIVE	Yes	I-SF2	Snapfinger
84	1420 SOUTH HAIRSTON ROAD	No	N/A	Snapfinger
85	1690 CHANTILLY DRIVE	No	N/A	North Fork Peachtree Creek
86	2000, 2200 LITHONIA INDUSTRIAL BOULEVARD, LITHONIA	No	N/A	Pole Bridge
87	2175 LAWRENCEVILLE HIGHWAY	No	I-IG17	South Fork Peachtree Creek
88	2277 MUNDAY DRIVE	No	I-IG6	North Fork Peachtree Creek
89	2614 LAKE ERIN DRIVE	Yes	N/A	North Fork Peachtree Creek
90	2711 FAIRLEE DRIVE	Yes	I-SF3	Snapfinger
91	3037 TONEY DRIVE	Yes	I-SF3	Snapfinger
92	3046 EAST PONCE DE LEON AVENUE	No	I-IG19	South Fork Peachtree Creek
93	352 NORTHERN AVENUE	No	I-SF1	Snapfinger
94	3548 BROOKFIELD LANE	Yes	I-SF2	Snapfinger
95	3549 PANTHERSVILLE ROAD	Yes	N/A	Snapfinger
96	3765 FOXFORD DRIVE	No	N/A	North Fork Peachtree Creek
97	3907 JERUSALEM COURT	Yes	N/A	South Fork Peachtree Creek
98	3911 ROMAN COURT	Yes	N/A	South Fork Peachtree Creek
99	4561 AMBERLY COURT SOUTH	No	N/A	Nancy Creek
100	4584 LAWRENCEVILLE HIGHWAY	No	N/A	Miscellaneous
101	4948 ARDSLEY DRIVE	No	N/A	Snapfinger
102	5495 EAST MOUNTAIN STREET	No	N/A	Snapfinger
103	5557 MARTINA WAY	No	N/A	Miscellaneous

Table 2. 21 Priority Fix List (PFL) Locations Subject to Request for Additional Time to Adequately Fix

PFL Site #	Address	Capacity Related (Yes/No)	Priority Area	Sub-Model Area
4	1433 DEERWOOD DRIVE, DECATUR	Yes	I-SF3	Snapfinger
7	1496 COUNTRY SQUIRE DRIVE, DECATUR	Yes	I-IG13	South Fork Peachtree Creek
11	1615 MELANIE COURT	Yes	I-SF3	Snapfinger
14	1942 EAST STARMOUNT WAY	Yes	N/A	Intrenchment Creek
15	1964 EAST STARMOUNT WAY	Yes	N/A	Intrenchment Creek
16	1970 EAST STARMOUNT WAY	Yes	N/A	Intrenchment Creek
19	2089 GARDEN CIRCLE	Yes	N/A	Intrenchment Creek
21	2480 MIRIAM LANE	Yes	I-SF3	Snapfinger
23	2804 MILLWOOD WAY, DECATUR	Yes	I-IG13	South Fork Peachtree Creek
26	3075 THRASHER CIRCLE, DECATUR	Yes	I-SF3	Snapfinger
27	3230 BORING ROAD, DECATUR	Yes	N/A	Snapfinger
32	3496 PANTHERSVILLE ROAD, DECATUR	Yes	N/A	Snapfinger
40	4124 FLAKES MILL ROAD, ELLENWOOD	Yes	N/A	Snapfinger
41	4347 FLAT SHOALS PARKWAY	Yes	N/A	Snapfinger
42	4437 WESLEYAN POINTE, DECATUR	Yes	N/A	Snapfinger
43	4557 MEADOW CREEK PATH, LITHONIA	Yes	N/A	Snapfinger
67	1430 COUNTRY SQUIRE DRIVE	Yes	I-IG13	South Fork Peachtree Creek
89	2614 LAKE ERIN DRIVE	Yes	N/A	North Fork Peachtree Creek
90	2711 FAIRLEE DRIVE	Yes	I-SF3	Snapfinger
91	3037 TONEY DRIVE	Yes	I-SF3	Snapfinger
95	3549 PANTHERSVILLE ROAD	Yes	N/A	Snapfinger