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*Via Electronic Mail and U.S. Mail*  
February 1, 2022

Chief, Clean Water Protection Branch  
ATTN: Mr. Richard Elliot  
Water Protection Division  
United States Environmental Protection Agency – Region 4  
61 Forsyth Street  
Atlanta, Georgia 30303-8960

**RE: Clean Water Act Consent Decree 1:10cv 4039-SDG  
February 1, 2022 – Minimum Linear Footage of Pipe Review, Design, and Rehabilitation  
Report**

Dear Mr. Elliot:

Pursuant to paragraph 7 of the Modification to the Consent Decree, entered by the United States Court for the Northern District of Georgia in U.S. v. DeKalb County, Case No. 1:10-cv-4039-SDG (Modification), which replaces paragraph 35(i) to the Consent Decree, DeKalb County is submitting the following document for your review and comment:

- February 1, 2022 — Minimum Linear Footage of Pipe Review, Design, and Rehabilitation Report

I certify under penalty of law that these documents and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations pursuant to CWA Section 309( c )(4).

If you have questions or comments regarding this submittal, please call me at 404-371-2174.

Respectfully,

Zachary L. Williams,  
Chief Operating Officer and Executive Assistant  
DeKalb County, Georgia

cc: Georgia EPD  
Viviane Ernstes, County Attorney  
Maria V. Houser, Director of Consent Decree and Environmental Compliance  
David E. Hayes, Director, DWM  
Brent Zern, Consent Decree Administrator  
E. Fitzgerald Veira, Troutman Sanders  
Matthew C. Welch, Deputy County Attorney

# 2022 Minimum Linear Footage of Pipe Review, Design, and Rehabilitation Report

## Introduction

DeKalb County (hereafter, the “County”) submits this certified report to identify projects in accordance with Paragraph 35(i) of the Modification to Consent Decree (MCD) (Civil Action 1:10-cv-04039-SDG) to 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 tables below detail the Minimum Linear Footage for each Project Category, as specified in Table E-1 of Appendix E of the MCD, and the County’s planned projects to meet those linear footage requirements for 2022, in addition to any lift station or storage projects planned for subsequent years.

## Lineal Footage Requirements for 2022

Table 1 below summarizes the minimum linear footage required by the MCD by the end of 2022, the linear footage completed at the end of 2021, and the resulting footage required to be completed in calendar year 2022.

**Table 1. Footage Required by MCD Commitments to be Completed in Calendar Year 2022**

Rehabilitation Type	To be completed by 12/31/2022 (LF)	Completed as of 12/31/2021 (LF)	Required to be completed in calendar year 2022 (LF)
Simple Pipe Review	830,000	883,835	None - this task is complete.
Simple Pipe Rehabilitation	585,000	513,999	71,001
Complex Pipe Design	145,000	110,823	34,177
Complex Pipe Rehabilitation	78,000	66,779	11,221

## 2022 Plan

### Simple Pipe Review

Simple Pipe Review is defined in Appendix E of the MCD as the

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.

At the end of 2021 the amount of Simple Pipe Review completed was 883,835 LF – 53,835 LF more than required by the MCD. All PASARP Simple Pipe Review has been completed, and no further Simple Pipe Review is planned for 2022.

## Simple Pipe Rehabilitation

Simple Pipe Rehabilitation is defined in Appendix E of the MCD as

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.

The County has multiple contracts available that it will use to complete the required 71,00 LF of Simple Pipe Rehabilitation in 2022. Table 2 provides details on the projects to be completed in 2022 to meet these requirements.

**Table 2. 2022 Simple Pipe Rehabilitation Projects**

<b>Project Information</b>	<b>Status</b>	<b>Estimated LF</b>
Gravity Sewer Replacement and Rehabilitation (GSRR) Contract – Section 1 – Renee Group, Inc (RGI)	Work Orders in place	25,000
Gravity Sewer Replacement and Rehabilitation (GSRR) Contract – Section 1 – Inland Pipe Rehabilitation (IPR)	Work Orders in place	25,000
Cooperative Agreement with Insituform Technologies, Inc. (ITI) – large-diameter CIPP lining work	Currently this contractor is underway and an additional Change Order planned for award 1Q2022	25,000
Cooperative Agreement with SAK Construction (SAK)	In process of entering agreement for approximately 75,000 LF with award planned 2Q2022	15,000
<b>Total Estimated Linear Footage for completion in 2022</b>		<b>90,000</b>

Through the above listed contracts, the County plans to complete approximately 90,000 LF of simple pipe rehabilitation in calendar year 2022, exceeding the 71,001 LF required by the MCD.

## Complex Pipe Design

Complex Pipe Design is defined in Appendix E of the MCD as the

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.

The County is completing complex pipe design through the design-builder previously contracted for Design Build Package #3 and through Task Orders under the County’s On-Call Engineering Contracts. The County plans to complete all or most of the following design projects listed in Table 3 in calendar year 2022.

**Table 3. 2022 Complex Pipe Design Projects**

<b>Contract Package</b>	<b>Project Description</b>	<b>Estimated LF</b>
Package 3, Component 1	Intergovernmental Basin – Nancy Creek, A-IG4	2,815
Package 3, Component 4	Snapfinger Basin – Barbashela, A-SF2	6,341
Package 4, Component 1	Snapfinger Basin – Shoal Creek, I-SF3	5,048
Package 4, Component 3	Snapfinger Basin – Shoal Creek, I-SF3	1,895
Package 5, Component 3	Snapfinger Basin – Shoal Creek, I-SF3	5,966
Package 5, Component 10	Snapfinger Basin – Cobb Fowler Creek, I-SF2	1,511
Package 7, Component 3	Snapfinger Basin – Indian Creek, I-SF2	3,795
Package 7, Component 4	Intergovernmental Basin – North Fork Peachtree Creek, I-IG16	5,366
Package 7, Component 9	Intergovernmental Basin – North Fork Peachtree Creek, I-IG14	2,682
<b>Total Estimated Linear Footage for completion in 2022</b>		<b>35,419</b>

Through the above listed projects, the County plans to complete approximately 35,419 LF of complex pipe design in calendar year 2022, exceeding the 34,177 LF required by the MCD.

## Complex Pipe Rehabilitation

Complex Pipe Rehabilitation is defined in Appendix E of the MCD as

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.

The planned 2022 Complex Pipe Rehabilitation includes a mix of comprehensive rehabilitation and pipe upsizing projects as listed in Table 4.

**Table 4. 2022 Complex Pipe Rehabilitation Projects**

<b>Contract Package</b>	<b>Project Description<sup>1</sup></b>	<b>Estimated LF</b>
Package 7, Component 5	Intergovernmental Basin – South Fork Peachtree Creek, I-IG13, Comprehensive Rehab Phase 2 - 1,073 LF	1,073
Package 8, Component 4	Intergovernmental Basin – South Fork Peachtree Creek, I-IG5, Comprehensive Rehab Phase 2 - 2,338 LF	862
Package 8, Component 7	Intergovernmental Basin – Nancy Creek, I-IG1, Comprehensive Rehab Phase 2 - 2,702 LF	724
Package 6, Component 3	Intergovernmental Basin – North Fork Peachtree Creek, A-IG5, Comprehensive Rehab 20,000 LF	978
Package 5, Component 4	Snapfinger Basin – I-SF2, Comprehensive Rehab 2,950 LF	480
Package 5, Component 11	Snapfinger Basin – Cobb Fowler Creek, I-SF2, Comprehensive Rehab 5,421 LF	776

Contract Package	Project Description <sup>1</sup>	Estimated LF
Package 6, Component 2	Intergovernmental Basin – North Fork Peachtree Creek, A-IG5, Comprehensive Rehab Phase 1 of 12,000 LF	1,459
Package 5, Component 14	Intergovernmental Basin – South Fork Peachtree Creek, I-IG13, Country Squire, Phase 2	479
Package 2, Component 5	Intergovernmental Basin – Nancy Creek, A-IG13, Phase 2	680
Package 3, Component 5	Snapfinger Basin – Indian Creek, A-SF3, Phase 2	594
Package 8, Component 5	Intergovernmental Basin – Nancy Creek, I-IG2, Tilly Mill	4,511
Package 5, Component 12	Snapfinger Basin – Cobb Fowler Creek, I-SF2, Cobb Branch/Brookfield Phase 1	3,000
<b>Total Estimated Linear Footage for completion in 2022</b>		<b>15,616</b>

<sup>1</sup>The Project description includes the total linear footage planned to be addressed through comprehensive rehabilitation. Only those linear feet anticipated to be claimed by the County are included in the Estimated LF column.

The combined comprehensive rehabilitation and complex pipe rehabilitation by pipe upsizing projects listed above will yield 15,616 LF of complex pipe rehabilitation credit, exceeding the 11,221 LF required for calendar year 2022.

## Lift Station Rehabilitation and Construction

The County has the following lift station projects within PASARP areas of the County:

- Kensington Lift Station: The purpose of this project is to replace an existing gravity sewer that, due to its depth and sagging, was presenting maintenance challenges with a new small lift station. This project has been awarded, with Notice-to-Proceed imminent. The period of performance is approximately one year with completion planned for early 2023.

## Additional Storage Construction

The County is in the planning stages of two potential offline storage facilities to store peak flows during wet weather events as needed to relieve capacity constraints within the WCTS in the Snapfinger Basin. These storage facilities, if adopted, will reduce the potential for SSOs and will reduce peak flows conveyed to the Snapfinger Advanced Wastewater Treatment Facility (AWTF).

The first sewer storage capital improvement project is planned to be located near the shared boundary of Shoal Creek and Conley Creek. The proposed volume of the storage facility is 15 million gallons. This project is currently in the site selection phase, and, if implemented, is expected to be completed by mid-2026.

The second sewer storage capital improvement project is planned to be located in the Upper Snapfinger Creek Sewershed. The proposed volume is 6 million gallons. This project is currently in the site selection phase, and, if implemented, is expected to be completed by the end of 2025.