



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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

Mr. Phil Roberson, Public Works Director  
City of Albany  
P.O. Box 447  
Albany, GA 31702

**AUG 02 2018**

RE: **Notice of Violation**  
City of Albany- Joshua Street Water Pollution Control Plant (WPCP) and Albany CSO  
NPDES Permit Nos. GA0037222 and GA0036854

Dear Mr. Roberson:

This letter serves as a Notice of Violation of the Georgia Rules and Regulations for Water Quality Control, the Georgia Water Control Act (Act), and National Pollutant Discharge Elimination System (NPDES) Permits No. GA0037222 and GA0036854 issued to the City of Albany (the City) on July 21, 2017 and March 3, 2014, respectively.

A review of the Environmental Protection Division (EPD) files indicates that the City has experienced a number of sanitary sewer overflows (SSOs) to Waters of the State from January 3, 2017 through July 5, 2018 (see Table 1). These SSOs included a spill event of 855,000 gallons that lasted for several days (May 19, 2018 through May 23, 2018) and another spill of 195,000 gallons on July 5, 2018. The Division alleges that these SSOs are violations of your NPDES Permit, the Rules and the Act. The City also experienced a permit violation for effluent pH of 5.7 reported September 30, 2017.

Representatives of this office inspected the Joshua and CSO facilities and the City's collection system on June 27 and 28, 2018. As part of the collection system inspection, EPD inspected lift stations No. 25, No. 26, and other areas that have experienced recent spills. A separate inspection report has been sent to the City.

While the City submitted notices and reports, and took immediate corrective action to clear the blockages affecting the collection system and repair faulty equipment, the Division is concerned that these short-term fixes may not adequately prevent recurrence of such spills in the future or address long-term capacity, management, operation and maintenance issues in the system.

The Division requests that you contact EPD within fifteen days of receipt of this letter to arrange a meeting to discuss the underlying causes of the cited SSOs, the specific corrective actions taken to address these SSOs and an assessment of the City's sewer system and the City's long-term plans to improve system integrity, maintenance and operation so that discharges of untreated sewage to the Waters of the State are minimized.

Notice of Violation  
City of Albany

The City will prepare a report for submittal at its meeting with EPD addressing the discussion topics noted. Because of some inconsistencies with previously submitted documents, this report should include updated spill reports for each spill listed in Table 1. Each spill report should contain the specific cause of the spill, date and exact location (i.e. the number of manhole or lift station), specific volume (gallons) and corrective actions. The Division will consider these reports and any other information that the City wishes to present to determine if additional enforcement action, including monetary penalty, is warranted.

Thank you for your attention to this matter. Please contact me at 404-463-4953 or by email at [Lewis.Hays@dnr.ga.gov](mailto:Lewis.Hays@dnr.ga.gov) to schedule the above mentioned meeting or to discuss any other questions you may have regarding this letter.

Sincerely,



Lewis F. Hays  
Program Manager  
Watershed Compliance Program

Table 1

Summary of Unpermitted Discharges to the waters of the State between March 2018 through July 5, 2018.

No.	Dates of Overflow	Location	Volume (Gallons)	Waterway Impacted	Reported Cause
1.	7/5/2018	LS22 (located on the east side of the Flint River adjacent to the MCLB canal)	195,000	Flint River	Control Power Short
1.	6/25/2018	Old river bypass gate at LS26	1,000	Flint River	Higher Flow
2.*	6/14/2018 and 6/16/2018	Manhole located approx. 120 feet north of the Oglethorpe bridge adjacent to the Flint River	18,000	Flint River	Rain and blockage at discharge piping of pump #1 in Lift Station 25 and blockage in a splitter box at the influent wetwell
3.*	5/20/2018 through 5/23/2018	Approx. 100 feet south of Oglethorpe Blvd. bridge	855,000	Flint River	Lift Station Equipment Failure/Manhole Overflow
4.	3/30/2018	Turtle Park near Oglethorpe Blvd. bridge adjacent to the Flint River	3,500	Flint River	Heavy rains
5.*	1/3/2017 to 1/9/2017	Multiple (52 stations)	1,808,850	Percosin Creek tributary to Flint River, Cooleewahee Creek tributary to Flint River, Georgia Power Reservoir to Flint River	8-9 tornados plus straight line winds resulting in power loss to 52 storm and sanitary lift stations
6.	1/27/2017	Pace street near the canal	270,000	Hog Pen Ditch tributary to Flint River	Line Collapse/Line blockage/Manhole Overflow

\*Report contains multiple overflow locations as well as multiple dates for the overflows.