



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

August 30, 2024

Jeffrey W. Cown, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1470A, East Tower
Atlanta, Georgia 30334
404-463-1511

Mr. Alfred Wiggins Jr., Commissioner
City of Atlanta Department of Watershed Management
72 Marietta Street NW
Atlanta, Georgia 3030

RE:

Facility Inspection
City of Atlanta- R.M. Clayton WRC
NDPES Permit No. GA0039012

Dear Commissioner Wiggins:

Representatives of the Georgia Environmental Protection Division (EPD) and the United States Environmental Protection Agency (EPA) conducted a Facility Inspection at the referenced facility on August 8, 2024. The purpose of the inspection was to evaluate compliance with the facility's approved National Pollutant Discharge Elimination System (NPDES) Permit No. GA0039012 under Paragraph 391-3-6-.06 of the Georgia Rules and Regulations for Water Quality Control. A copy of the inspection report is enclosed for your review. A copy of EPA's reconnaissance report is also enclosed for your review.

Within thirty (30) days of receipt of this letter, please notify EPD in writing of the actions that have been, or will be taken, to address the deficiencies noted.

Should you have any questions concerning this correspondence, please contact Eddy Basilio, of my staff, at edwina.basilio@dnr.ga.gov. Your cooperation is greatly appreciated.

Sincerely,

Marzieh Shahbazaz, Manager
Municipal Compliance Unit

Cc:

Alfred Wiggins Jr., Commissioner (awiggins@atlantaga.gov)
Quinton Fletcher, Deputy Commissioner (qfletcher@atlantaga.gov)
Deirdre Edwards, Watershed Manager, Environmental Compliance (dedwards@atlantaga.gov)
Jairo Castillo, Chief, Wastewater Enforcement Section, US EPA (castillo.jairo@epa.gov)

City of Atlanta R.M. Clayton WRC Inspection Report

GA0039012

Date of Inspection: Thursday, August 8, 2024

Inspectors: Eddy Basilio- GA EPD, Reginald Williamson- GA EPD, David Phillips- US EPA,
and Tristan Odekirk- US EPA

Facility Representatives: Joe Porter- Interim Plant Manager, Leondre Turner- Assistant Plant
Manager, Carl Long- Safety Officer, Vincent Jenkins- Inspector COA OWP, Quinton Fletcher-
Deputy Commissioner COA OWTR

Report prepared by: Eddy Basilio

Purpose of Site Visit: Following the March 2024 Inspection conducted by EPD, multiple operational and equipment changes have been made. The purpose of the inspection was to evaluate the operational and equipment status of the WRC and evaluate if the updates provided by the City were completed. Below is the information and associated photographs gathered during the site visit.

Information Gathered

Preliminary Screening

The WRC has four bar screens. All bar screens are operable as designed. Bar screens are used based on the facility flow. The WRC has three drum screens. All three screens can be operated. Drum Screen #2 has a hole in the screening, but it can be operated to assist in reducing debris. Inspector were informed that the damage had been present for approximately two weeks and drum screen #2 is only operated during high flows. Inspectors were also informed that the replacement screen has been received and the facility is awaiting replacement.

Facility personnel turned on drum screen #2 to demonstrate operation ability. The motor drive cover for screen #2 is rusted and shakes some when the drum screen is in operation.

The WRC has 12 grit cells and classifiers. The inspectors noted damage to grit classifiers #1 and #4. Inspectors were informed that classifier #1 went out-of-service the previous day and a work order has been entered for the repair.

Primary Clarification

The inspectors viewed each of the eight primary clarifiers through a bay opened by plant personnel. All eight clarifiers were operational with flow over the weirs. Debris and algae were observed in the weirs of all eight clarifiers. EPD was informed that a preventative maintenance (PM) is underway for either weekly or bi-weekly cleanout of the weirs. A sludge judge was used to measure the sludge blanket of primary clarifier #6. Then blanket was 4.5 feet.

Aerations Basins/ Biological Nutrient Removal (BNR)

The WRC has fourteen BNR basins. Basins #3, #9, #11, and #14 were down for repairs. Basin #9 was scheduled to come back online August 9th and repairs actively being made on Basin #14. Basin #3 and #11 are slated to have repairs next, with all BNR basin repairs anticipated to be completed by December 2024. Diffuser issues were observed in Basin #1 and floating debris in Basins #12 and #13. All other basins were operating as designed.

Mixed Liquor Pump Station

Two of the six mixed liquor pumps were out-of-service for repairs. There was some debris on the piping for the foam pits. Three rental pumps to draw from the well catchment were observed. Inspectors were informed that one of the four waste return pumps was out-of-service for maintenance.

Secondary Clarification

Inspectors were notified that secondary clarifiers #5, #6, and #8 were still out-of-service. Clarifier #6 had some repairs so the unit was running to test the operational capacity. Of the operational clarifiers, pin floc or large floating solids were present in all, along with debris and algae on weirs. Some secondary clarifiers had broken arms.

All eight mobile clarifiers brought on-site after the March 2024 inspection still remain. The facility uses 3-4 to assist the secondary clarifiers based on flow. At the time of the inspection, only two mobile clarifiers were online.

EPD requested sludge blankets for all operational clarifiers. Clarifiers #5 and #8 blankets were not measured due to solids build up. Two of the secondaries had sludge judge of zero feet. Due to the solids on the surface of these clarifiers, EPD believes the zero foot sludge blankets are incorrect.

Clarifier Number	Sludge Blanket	Blanket to Clarifier Percentage
1	0 feet	0%
2	2.75 feet	13.75%
3	4.5 feet	22.5 %
4	0 feet	0%
6	6.25 feet	31.25%
7	8.0 feet	40%
9	6.0 feet	30%
10	4.5 feet	22.5%

Tertiary Filtration

The WRC has 22 sand filters. Six of the sand filters were offline. Filters #3, #9, and #13 require some repairs for the filters to operate automatically. During high flows, the plant personnel will run these filters manually. Filters #20, #21, and #22 are offline for preventative maintenance. There were some solids present in the operating sand filters.

Disinfection

There are four UV trains. Train #1 is out-of-service for cleaning. EPD was informed that the facility is working on developing a PM program to take one train offline each week for cleaning. There was some solids on the walls for the effluent coming from UV 1, which was backwashing.

There is a temporary sodium hypochlorite tank on-site prior to flow to the sand filters to assist with disinfection. Sodium bisulfite is used to dechlorinate the effluent.

Effluent Discharge from Outfall

The effluent could be seen discharging from the pipe in the Chattahoochee River. There was no foam evident at the outfall. The outfall identification sign had been replaced following the March 2024 site visit. Although the effluent did appear clear, there was a chlorine smell at the outfall.

EPD requested a grab sample at the effluent to be analyzed for pH, dissolved oxygen (DO) and total residual chlorine (TRC). Since a sample had been taken about an hour prior to arrival, EPD requested those values. As provided by the facility, the pH was 7.56, the DO was 8.02 mg/L, and the TRC was 1.15 mg/L.

Overall Maintenance and Operation

There were multiple maintenance issues identified. In the bar screen room, there is a broken spigot spraying water onto the floor, resulting in ponding and potable water on the floor throughout the room. Inspectors were informed that the leak had been occurring for about a month. To repair the line, the water to entire area must be shut off. A request has been placed with facility maintenance, with a repair date pending.

The grit classifiers requiring repairs are leaking water onto the floor in the room. The eyewash/shower station in the old chemical room ponds on the floor instead of flowing to the associated drain. There was potable water leaking at various parts of the facility.

Operations have improved since the March 2024 visit. Many secondary clarifiers have come back online, the drum screens have been put into operations, all primary clarifiers are operational, effective disinfection has improved, and the appearance of the effluent has improved.

Final Thoughts

Since the March 2024 visit, operations at the WRC have improved, however there is still equipment that need to be returned to full operation and proper maintenance to return the facility to full compliance. It is imperative that the City continue to make repairs to critical equipment, establish critical PM programs, and ensure staff are properly trained to not only return the facility back to proper operations, but to maintain compliance in the future.

Photographs



Photo 1: Bar Screens



Photo 2: Leak in Bar Screen Room



Photo 3: Grit Cells



Photo 4: Grit Classifiers



Photo 5: Damaged Grit Classifier (1)



Photo 6: Damaged Grit Classifier Zoomed In



Photo 7: Damaged Grit Classifier (2)



Photo 8: Drum Screen #1



Photo 9: Drum Screens #2 and #3



Photo 10: Damage to Drum Screen #2



Photo 11: Motor Cover for Drum Screen #2



Photo 12: Water from Eyewash/Shower in Old Chemical Building



Photo 13: Primary Clarifiers



Photo 14: Primary Clarifier Weir (1)



Photo 15: Primary Clarifier Weir (2)



Photo 16: Primary Clarifier Weir (3)



Photo 17: BNR #9



Photo 18: BNR #8

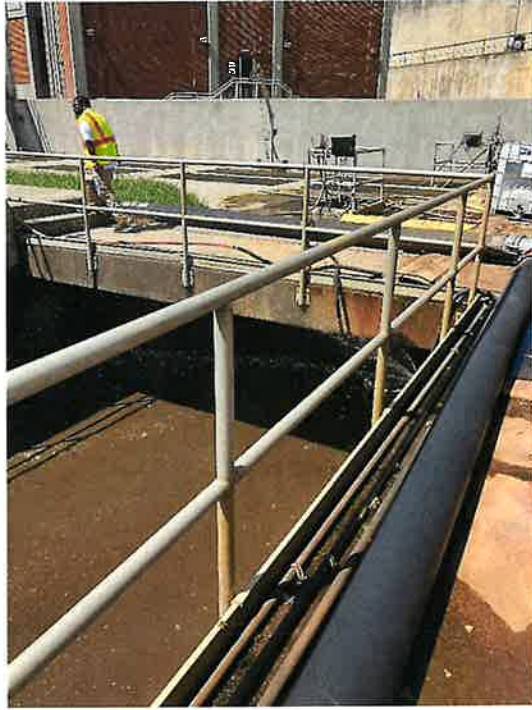


Photo 19: Potable Water Leak in BNR Basins



Photo 20: BNR #11



Photo 21: Mobile Clarifiers



Photo 22: Foam Pit



Photo 23: Secondary Clarifier #9 (picture provided by EPA)



Photo 24: Secondary Clarifier #7 (picture provided by EPA)



Photo 25: Secondary Clarifier #5 (picture provided by EPA)



Photo 26: Secondary Clarifier #2 (picture provided by EPA)



Photo 27: Secondary Clarifier #6 (picture provided by EPA)



Photo 28: Secondary Clarifier #8 (picture provided by EPA)



Photo 29: Secondary Clarifier #10 (picture provided by EPA)



Photo 30: Mobile Belt Press



Photo 31: Sand Filters (1)



Photo 32: Sand Filters (2)



Photo 33: Sand Filters (3)



Photo 34: UV (1)



Photo 35: UV (2)



Photo 36: Damaged Equipment Near UV



Photo 37: Outfall Identification Sign



Photo 38: Outfall to Receiving Stream



REGION 4

ATLANTA, GA 30303

ELECTRONIC MAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Al Wiggins Jr., Commissioner
Department of Watershed Management
City of Atlanta
72 Marietta Street NW
Atlanta, Georgia 30303
awiggins@atlantaga.gov

Re: NPDES Permit No. GA0039012, Reconnaissance Inspection Report

Dear Commissioner Wiggins:

The U.S. Environmental Protection Agency, Region 4, joined the State of Georgia for an inspection of the R.M. Clayton Water Reclamation Center (the facility) at 2532 Bolton Road NW on August 8, 2024. The inspection evaluated the facility's compliance with its National Pollutant Discharge Elimination System permit and the Clean Water Act.

The resulting EPA inspection report is enclosed for your information. If you have any questions about this inspection report, please contact David Phillips at 404-562-9773 or phillips.david@epa.gov.

Sincerely,

**JAIRO
CASTILLO**
Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Digitally signed by JAIRO
CASTILLO
Date: 2024.08.29
07:10:19 -04'00'

Enclosure



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024

SECTION A: National Data System Coding

NPDES No.	MO/DAY/YR	Inspection-Type	Inspector	Facility-Type
GA0039012	8/8/2024	ROS (Reconnaissance without Sampling)	David Phillips	Publicly owned treatment works

SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) R.M. Clayton Water Reclamation Center 2532 Bolton Rd NW Atlanta, Georgia 30318	Entry Date/Time 8/8/2024 9:30 AM Exit Date/Time 8/8/2024 2:16 PM	Permit Effective Date 1/1/2024 Permit Expiration Date 12/31/2028
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) Joseph Porter, Interim Plant Manager; LeAndre Turner, Asst. Plant Manager; Quentin Fletcher, Deputy Commissioner of the Office of Water Treatment & Reclamation, Vincent Jenkins, Env. Program Manager. The state-entered facility contacts/# in ICIS are blank.	Other Facility Data Design capacity 122 MGD	
Name, Address of Responsible Official/Title/Phone and Fax Number Ed Wiggins, Commissioner of the Department of Watershed Management	State lead contacted the responsible official before the unannounced inspection. Contacted <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	

SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)

<input type="checkbox"/> Permit	<input type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Operation & Maintenance	<input type="checkbox"/> CSO/SSO (Sewer Overflow)
<input type="checkbox"/> Records/Reports	<input type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Pollution Prevention
<input checked="" type="checkbox"/> Facility Site Review	<input type="checkbox"/> Compliance Schedules	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> Multimedia
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	<input type="checkbox"/> Other:

SECTION D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See attached.

<u>Inspector Name</u>	<u>Agency/Division/Phone</u>	<u>Date</u>
Eddy Basilio (Lead) Reginald Williamson	GA EPD – WPB GA EPD – WPB	.
David Phillips DAVID PHILLIPS Digitally signed by DAVID PHILLIPS Date: 2024.08.29 08:06:47 -04'00'	EPA R4/ECAD 404-562-9773	8/29/24
Tristan Odekirk TRISTAN ODEKIRK Digitally signed by TRISTAN ODEKIRK Date: 2024.08.29 09:19:58 -04'00'	EPA R4/ECAD 404-562-9295	8/29/24
Management QA Reviewer Jairo Castillo JAIRO CASTILLO Digitally signed by JAIRO CASTILLO Date: 2024.08.29 11:37:40 -04'00'	EPA R4/ECAD 404-562-9257	8/29/24



Section D: Summary of Findings

On August 8, 2024, the U.S. Environmental Protection Agency, Region 4, conducted a Reconnaissance Inspection (“RI”) of the City of Atlanta’s R.M. Clayton Water Reclamation Center (“Facility”) located at 2240 Bolton Road NW, in Atlanta, Georgia. The inspection team was led by Eddy Basilio of the Georgia Environmental Protection Division’s Water Protection Branch (“Georgia EPD”). Beginning with its July 2023 self-monitoring compliance report, the City began reporting chronic effluent violations to Georgia EPD. These included total suspended solids exceedances, which the City explained as resulting from issues with their secondary clarifiers. By February 2024, the City had reported 48 exceedances of its permit limits.

On March 7, 2024, Georgia EPD performed an unannounced compliance inspection of the Facility. At that time, Georgia EPD learned that the Facility had comprehensive operational failures stemming from a total loss of all six of its primary clarifiers for some time. On March 22, 2024, Georgia EPD issued the City a Notice of Violation alongside their inspection report. On April 19, 2024, the City responded that it had begun taking measures to recover the facility and meet E. coli limits.

1. **Facility Description.** The Facility has a design flow of 122 million gallons per day, presenting it as one of the largest major POTWs in Region 4. The Facility uses primary, secondary, and tertiary treatment processes for wastewater treatment.

The primary stage is designed to remove grit and other large debris that can damage assets in the Facility or accumulate within other units to reduce treatment efficiencies. At the Facility, this stage includes four mechanical bar screens, six vortex-type grit collection systems, and three rotary drums with fine-mesh screens. The screened wastewater is then sent to eight primary clarifiers, which are 12-ft deep basins used to settle the larger solids out and send the supernatant flow to secondary treatment.

The secondary stage is designed to use biological processes to break down the organic waste in the wastewater and remove most of the nutrients present. At the Facility, this stage includes 14 rectangular biological nutrient removal (“BNR”) basins that are operated to also reduce phosphorous. Each of the basins assist the process with mixers and compressed air delivered through fine bubble diffusers at their bottoms. The wastewater treated in the BNRs is then sent to 10 secondary clarifiers, which separate the biomass and return part of the settled biomass to the BNRs while sending the supernatant flow to the tertiary treatment systems.

The tertiary stage polishes the wastewater through 22 deep bed granular media filters by removing smaller suspended solids and the remaining phosphorous content. The filters are composed of coal, sand, and gravel layers that each have depths of two to six feet. A chemical polymer is added after filtration to coalesce any suspended solids before the flow enters ultraviolet (“UV”) treatment. Flow is irradiated there by up to four bays of UV lights to provide disinfection. The disinfected wastewaters are then aerated with a post-aeration treatment before it is monitored for compliance and discharged into the Chattahoochee River.

Waste solids from all the treatment processes are managed with a thickening system, anaerobic digesters, and dewatering systems. Once these are completed, the solids are sent to a landfill for disposal.



Reconnaissance Inspection Report

Project No. CV-RI-GA0039012-08082024

2. Objective. The intent of this RI was to assist Georgia EPD and to evaluate the condition of the Facility following the state's inspection and City's response during the March-April 2024 timeframe. On July 2, 2024, Chattahoochee Riverkeeper ("CRK") filed a Notice of Intent to Sue with the District Court based on its monitoring of the Facility's end-of-pipe and within the Chattahoochee River.
3. Opening Conference. The party convened in a training room at the administration building with Mr. Joseph Porter, Mr. LeAndre Turner, and Deputy Commissioner Quentin Fletcher. Georgia EPD requested the results of the morning effluent grab sample to obtain dissolved oxygen, pH, and residual chlorine values, and requested copies of the operating records for the secondary clarifiers from April to present, updating their collection from the last inspection. The City supplied its Safety Officer to join the party since the heat index was forecast to be above 100 ° F. With all parties present, the inspection proceeded to a walk-through of the Facility from influent screening to the effluent point.
4. Walk-Through of the Facility.
 - a. *Primary Screening.* The four mechanically cleaned bar screens were inspected. In the room, a spigot on a water line used to wash down the area was observed to be broken. The water was spraying at full force, ponding in the doorway to the room, and draining into the well for screen #4. A traffic cone had been placed upon the spigot head to help divert the spray.

Mr. Porter noted that he had entered a work order for the repair two months ago to the City's Facilities Department. When asked why the Facility's maintenance unit would not handle the repair (and perhaps more quickly), Mr. Porter noted he tries to send such tickets to the city-wide Facilities Department because it can be costed from that budget instead of the Facility's budget.

Mr. Porter noted that preventive maintenance had recently been completed on all four bar screens. All of the screens were operational and in good repair; they activate based on flow.

Mr. Jenkins joined the inspection beginning at the grit management equipment building. This building had an odor control system in place that was operating. The lower floor contained two truck trailers that were collecting the grit separated from the wastestream by the six vortex collection systems located on the upper floor. Each vortex unit has two collection cells, and the units cycle on based on flow demand. On the upper floor, inspectors encountered another collection of water on the floor that EPA sourced to leaks from classifier cell #4 of vortex unit #2, and classifier cell #1 of vortex unit #1.

The drum screen building, which houses the three large rotating drums with perforated screens was evaluated. Inspectors observed that all three drums were operational, but drum #2 had a screen element with an estimated 1 to 1.5 foot diameter hole in it. Deputy Commissioner Fletcher noted that drums #1 and #3 were normally used, and #2 was only deployed in high flow situations. Later, during the closing, Mr. Porter noted that a replacement screen had been received from the overseas manufacturer and it was available to install, but the work order he submitted two weeks ago was still outstanding.

The motor drive cover and drive base for drum #2 were also significantly rusted compared to



Reconnaissance Inspection Report

Project No. CV-RI-GA0039012-08082024

those for the other two drums. Deputy Commissioner Fletcher noted they would look into replacing those.

- b. *Chemical storage.* The inspection team stopped at chemical storage area #1791 in Headworks Building #32. When the Safety Officer tested the eye wash station, water ponded in the building rather than to an eye wash drain. Mr. Turner noted this chemical storage area serves as a secondary supply of sodium hypochlorite to be used in the event of high demand. EPA inspectors observed a pair of large chemical storage tanks in the area labeled as sodium hypochlorite and 10 CST 1. EPA inspectors observed liquid in the secondary containment pit, and the pumps associated with the tank had white corrosive build-up present suggesting they may have difficulty functioning if called upon. EPA inspectors did not observe an emergency ventilation system and an alarm in the event of a tank leak.
- c. *Primary Clarifiers.* The party inspected an opened cover bay on each of the eight primary clarifiers, which have wells that are 15 feet deep. The opened bay allowed an observation of the overflow weir and channel, and the near end of the clarifier well, in that specific area as well as the control arm if it was positioned to pass.

The field of primary clarifiers, as well as other areas of the Facility had tall grass, approximately 1.5 to 2 feet high. When EPA inspectors inquired, Deputy Commissioner Fletcher noted that lawn maintenance for the Facility is on a periodic contract. Later, towards the end of the RI, mowing crews had arrived to cut the Facility's tall grass.

All eight of the primary clarifiers were operating and flows over the weirs were observed. Primary clarifier #5 was not flowing but was operationally gated and Mr. Turner opened the gate temporarily to demonstrate flow. All eight of the primary clarifiers were observed to have unscreened debris and algal build-up on their weirs, indicating operational and maintenance needs. Georgia EPD requested the blanket depth of primary clarifier #6 be measured with a field tube, also known as a sludge judge. The blanket depth in the well 4.5 feet.

The primary clarifiers were referenced by the plant staff using sequential numbers, but these references did not match the signage, where present, on the primary clarifiers. This made it difficult for inspectors to ascertain which unit was being observed or discussed. Deputy Commissioner Fletcher noted that the City had a project planned to eventually label the equipment as it is currently referenced.

- d. *Aeration / Biological Nutrient Removal ("BNR") Tanks.* The 14 BNR tanks were inspected. The Facility management advised of ongoing maintenance activities on broken diffusers and air supply lines to these tanks. Broken diffusers observed in BNR #9 and broken diffusers and air supply lines observed in BNR #14 were stated to be under an active repair contract and would be returned to service the next day. Facility management noted that similar issues observed with BNRs #3 and #11 are next to be contracted. EPA inspectors also observed BNR #1 to have diffuser issues and observed unscreened floating debris that had passed into BNR #12 and #13.
- e. *Mixed Liquor Pump Station Well.* The BNR trains are separated by a hill, and mixed liquor is



Reconnaissance Inspection Report

Project No. CV-RI-GA0039012-08082024

pumped up the hill to the train including BNR #11 through #14. EPA inspectors noted the presence of three rental pumps setup to draw from the well catchment. Mr. Turner advised that two of the six pumps at the Facility designed for this purpose were slated for repair. Mr. Porter later noted that one of the four waste return pumps was also down for maintenance.

- f. *Secondary Clarifiers.* Prior to inspecting each of the 10 secondary clarifiers, the Facility management advised that secondary clarifiers #5, 6, and 8 remained out of service. The eight mobile clarifiers installed after the July inspection by Georgia EPD were still onsite. Deputy Commissioner Fletcher noted that the Facility has been recently using up to four of the mobile units at a time unless a higher flow demand is required, and at the time of this inspection the Facility was only using two of the mobile units.

The secondary clarifiers are identified numerically with signage, but their placements and missing signage in places hindered their proper identification by inspectors. All secondary clarifiers had indications of deferred maintenance, which was observed as significant algae build-up and other debris on their effluent weirs.

All secondary clarifiers had evidence of a lengthy operational problem, which was observed as floating solids ranging from pin floc (unit numbers 1, 3, and 4) to more significant quantities of large floating solids (unit numbers 2, 6, 7, and 9). In most of these units, the floating solids were observed passing through the weirs as they broke up. The aluminum staircase at unit number 2 was in disrepair, appearing to have been hit by a motorized vehicle.

Some secondary clarifiers were entirely covered with a thick layer of semi-dried solids, suggesting the solids blankets had floated and then began evaporating at the surface. Unit numbers 5 and 8, which were reported to be out of service, had been drained and had standing water, respectively. There was evidence that the thick solids layer in unit number 5 had filled the effluent channel before it had been drained. The other unit reported to be out of service, unit number 6, had a light tan colored flow occurring over its weir.

Unit numbers 8 and 10 were both covered in a thick layer of semi-dried solids. In unit number 10, which was still passing flow, plants were growing directly on the semi-dried solids and on the weir, suggesting time passage since the floating solids accumulation. The effluent of unit number 10 was turbid.

Skimming arms in several units were broken or bent. Unit number 2 was bent, unit number 5 was completely broken in half, and unit number 7 was also broken.

- g. *Tertiary systems.* Six of the 22 deep bed granular media filters were not in operation. Units 3, 9, and 13 were off-line due to solenoid failures that allow the units to run automatically. Plant staff noted they could be run manually if necessary. Units 18, 20, and 22 were off-line for scheduled preventive maintenance. The operating filters were observed being backwashed and loading flow to filter. A large temporary tank of sodium hypochlorite solution was stationed before the filters.



Reconnaissance Inspection Report

Project No. CV-RI-GA0039012-08082024

The ultraviolet disinfection system was not observed by the EPA inspectors due to time constraints, but it was inspected by the Georgia EPD. The Facility's ultraviolet disinfection system scales the banks of lights and power up and down based on flow rate. Mr. Porter noted to EPA inspectors that the ultraviolet transmittance measured recently had averaged near 68, which he believed to be nearly normal for the Facility, and noted that the design transmittance of the system was 60. He noted that a few months prior, the measurement averaged in the range of 50 units. He believed that returning some of the secondary clarification capacity back to the Facility along with the mobile assistance had yielded that result.

- h. Effluent outfall. EPA inspectors visited the effluent outfall with Mr. Porter and Deputy Commissioner Fletcher. The outfall is a short distance downhill from the Facility's compliance monitoring station. The discharge flows through a rock outcrop to a diffuser that empties directly into the Chattahoochee River. The discharge itself was not visible at the time that the EPA inspectors were standing on the platform above the outfall line.

5. Closing Conference. The closing conference was conducted at the Facility's administrative building and it was led by Georgia EPD. EPA inspectors shared the concerns and observations noted in this report. Deputy Commissioner Fletcher noted that the City has contracted Westec to rebuild Secondary Clarifier unit numbers 5 and 8 starting in September 2024 and ending by January 2026. After that work is done, they will commence rebuilding unit number 6 sometime in 2026.

EPA inspectors asked what the Facility believed was the cause of the observed decline in operation and maintenance. The Facility managers noted that a cold weather period had led to pipes breaking in the Facility screening, and this resulted in bypassing primary screening operations. This loss of screening dominoed into losing primary treatment and later secondary treatment operating capacities. Mr. Turner noted that there are plans to put heat tape on major pipes so that such pipe breaks do not reoccur in cold weather.

6. Selected Photos. The following photos were selected from all of those taken to demonstrate the observations that are noted in this report.



Photo 1. Primary Screening - Leaks from equipment seals on second floor of Grit Management Building; pictured are vortex separator Unit #1, classifier cell #1 and Unit 2, classifier cell #4.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 2. Primary Screening – Hole within fine mesh screen drum #2 in Drum Screen Building.



Photo 3. Primary Screening – Rusted drive cover of fine mesh screen drum #2 in Drum Screen Building.

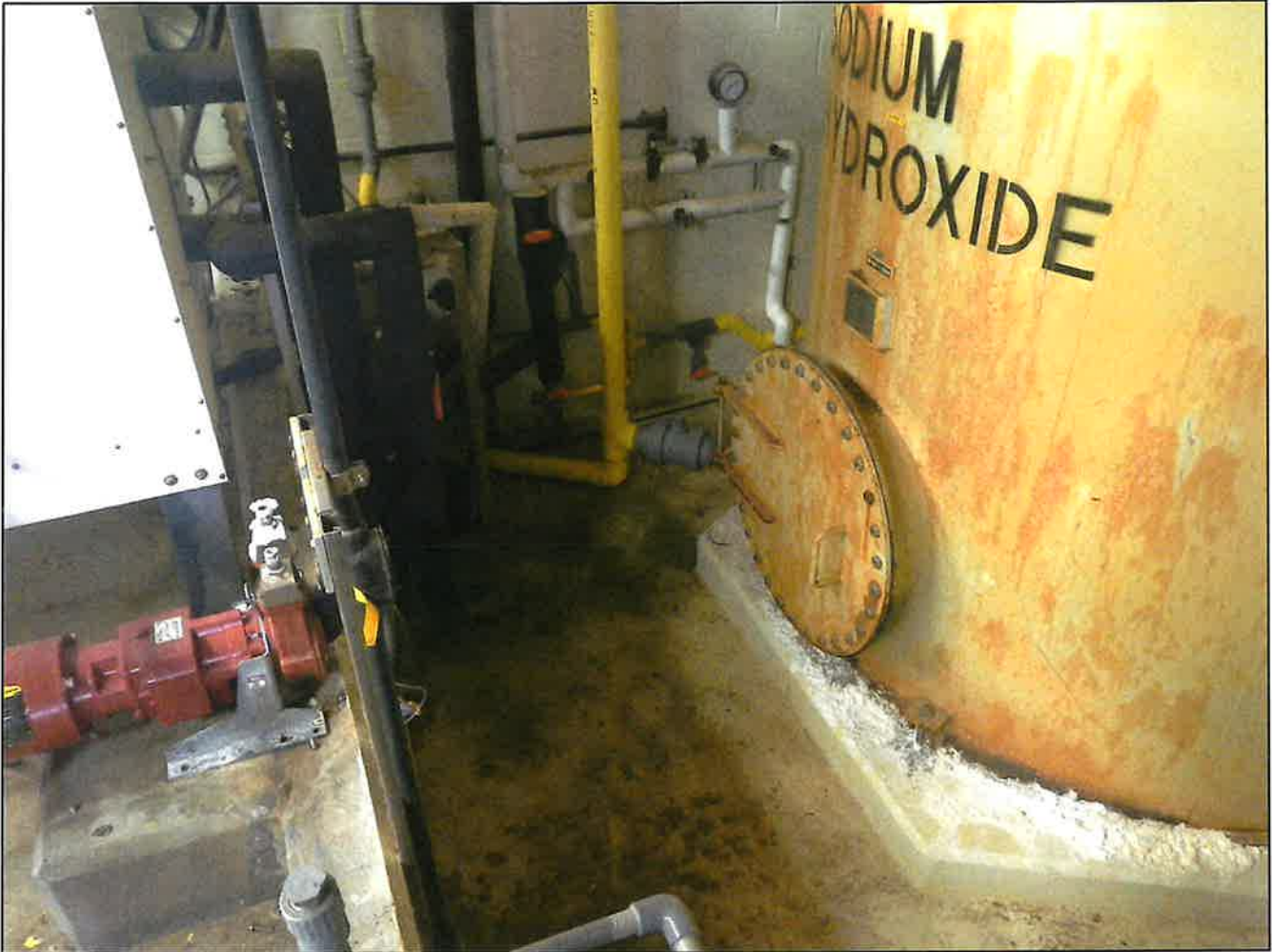


Photo 4. Chemical Storage – Corroded sodium hypochlorite tank base, corroded delivery device, and leakage in secondary containment.



United States Environmental Protection Agency
Region 4

Reconnaissance Inspection Report

Project No. CV-RI-GA0039012-08082024



Photo 5. Primary Clarification – Debris and algal buildup on weirs, and evidence of solids passage over weirs; pictured is primary clarifier #8.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 6. Primary Clarification – Debris and algal buildup on weirs, and evidence of solids passage over weirs; pictured is primary clarifier #4.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 7. Biological Nutrient Removal (“BNR”) – Evidence of diffuser issues in Tank #1.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 8. Mixed Liquor Pump Station Well – Bypass pumps in place.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 9. Biological Nutrient Removal (“BNR”) – Floating unscreened solids in BNR Tank #13.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 10. Temporary sodium hypochlorite tank and mobile secondary clarifiers installed between the Facility's secondary clarifiers and tertiary treatment.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 11. Secondary Clarification – Clarifier #7 with abundant floating solids and broken skimming arm.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 12. Secondary Clarification – Clarifier #5 (out of service) drained with evidence of solids blanket floatation that had extended beyond the outer weir into the effluent channel.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 13. Secondary Clarification – Clarifier #2 with abundant floating solids and bent skimming equipment.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 14. Secondary Clarification – Clarifier #6 with abundant floating solids.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 15. Secondary Clarification – Clarifier #8 (out of service) with effluent channel cleaned out and with floating solids blanket.



Photo 16. Secondary Clarification – Clarifier #10 in operation with floating solids blanket covered with plant life, and with abundant algal growth built up on the weir and effluent channel.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 11. Secondary Clarification – Clarifier #10 with advanced plant growing out of effluent weir among abundant algal growth and debris depth built up on the weir and effluent channel.



United States Environmental Protection Agency
Region 4

Reconnaissance Inspection Report

Project No. CV-RI-GA0039012-08082024



Photo 18. Secondary Clarification – Clarifier #10 with abundant floating solids and effluent channel with turbid effluent.



United States Environmental Protection Agency
Region 4
Reconnaissance Inspection Report
Project No. CV-RI-GA0039012-08082024



Photo 19. Tertiary Treatment – Media filters #18, 20, and 22 (out of service).

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