

**CONSENT DECREE
PROGRESS REPORT**

2002 VOLUME 4

**FOURTH QUARTER REPORT
OCTOBER 1, 2002 THROUGH DECEMBER 31, 2002**



January 2003

STATEMENT OF CERTIFICATION

I certify under penalty of law that this document 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 fine and imprisonment for knowing violations.

W. Malcolm Steeves, P.E.

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SECTION I: SUMMARY

SECTION I: SUMMARY

1. Reporting Requirements

On January 24, 2002, the Board of Water and Sewer Commissioners of the City of Mobile entered into a Consent Decree (CD) with the United States, the State of Alabama and Mobile Bay Watch, Inc. (MBW). The following progress report consolidates the quarterly reporting requirements described in CD Paragraphs 44 and 98 regarding the following: (1) status of work performed; (2) unpermitted discharge information; (3) water quality monitoring data; and (4) the status of the Supplemental Environmental Projects (SEPs). Additionally, this report includes the semi-annual analysis of wastewater collection and transmission systems and wastewater treatment facilities required by CD Paragraph 21.

2. Report Organization

This report is divided into the following sections:

Section I: Summary – describes the reporting requirements of the CD, the report structure and a report summary.

Section II: Performance of Consent Decree Work – provides information described in CD Paragraph 98:

- CMOM measures pursuant to the CD implemented or discontinued during the previous quarter
- Description of the status of compliance with the Consent Decree along with reasons for non-compliance
- Summary of Sanitary Sewer Overflows (SSOs) during previous quarter

Section III: Water Quality Monitoring – provides information regarding the status of the Water Quality Monitoring Program including water quality monitoring data as required by CD Paragraph 98.

Section IV: Supplemental Environmental Projects – describes progress of planning and implementation of each SEP as required by CD Paragraph 44.

Section V: Civil Penalties – describes progress of paying Civil Penalties as required by CD Paragraph 53.

SECTION I: SUMMARY

Appendix A-1: Table of Sanitary Sewer Overflows and Unpermitted Discharges – provides a listing of all sanitary sewer overflows and unpermitted discharges that occurred during the quarter as required by CD Paragraph 98.

Appendix A-2: Grease Control Table – provides information for commercial and industrial facilities regarding grease control devices including their required capacity, their actual capacity, inspection information, and enforcement information as required by CD Paragraph 26.

Appendix A-3: Analysis of Wastewater Collection and Transmission Systems and WWTFs – provides trend information with regard to Unpermitted Discharges and SSOs as required by CD Paragraph 21.

3. Report Summary

This status report is the fourth quarterly report required by the Consent Decree (CD) and covers the period from October 1 to December 31, 2002. With the exception of the Unscheduled Maintenance Program due March 1, 2003, all programs required by the CD have been submitted for approval.

3.1 Status of Compliance

To date, the Board has submitted all program reports in accordance with the CD schedule. The following presents the dates of program submittals, EPA comments, and the Board's responses:

December 21, 2001 Program Submittals

- Short-Term Collection and Transmission Systems Capacity Assurance Program (CAP)
- Short-Term CAP for WWTPs
- Preliminary Industrial Storm Water Discharge Report
- Reporting, Notification, and Record Keeping Program

January 31, 2002 Program Submittal

- Proposed SEP 1 project locations

SECTION I: SUMMARY

February 28, 2002 Program Submittals

- Short-Term CAP for WWTPs – Follow-up Report
- Capacity Assurance – Decentralized Wastewater Treatment Systems
- Legal Support Programs for Sewer System (Ordinances)
- Water Quality Monitoring Program

April 29, 2002 Program Submittal

- Short-Term Pump Station Certification
- Lift Station Action Plan
- First Quarter 2002 CD Status Report (Volume 1)

May 1, 2002 EPA Program Comments to Submittal Dated December 21, 2001

- Short-term Collection and Transmission Systems Capacity Assurance Program (CAP)
- Short-term CAP for WWTPs
- Preliminary Industrial Storm Water Discharge Report

May 2, 2002 EPA SEP 1 Comments to Submittal Dated January 31, 2002

May 10, 2002 Responses to EPA SEP 1 Comments of May 2, 2002

May 29, 2002 Responses to EPA Comments of May 1, 2002

- Short-Term Collection and Transmission Systems CAP
- Short-Term CAP for WWTPs
- Preliminary Industrial Storm Water Discharge Report

May 29, 2002 Program Submittals

- Grease Control Program
- Proposed Grease Ordinance
- Service Contract for Eating Establishments

SECTION I: SUMMARY

May 30, 2002 EPA Program Comments to Submittal Dated January 31, 2002

- Water Quality Monitoring Program

June 27, 2002 Response to EPA Comments of May 30, 2002

- Water Quality Monitoring Program

July 30, 2002 Second Quarter & Semi-Annual CD Status Report (Volume 2)July 31, 2002 Program Submittals

- Long-Term Capacity Assurance Program for Wastewater Collection and Transmission Systems
- Long-Term Capacity Assurance Program for WWTPs
- Legal Support Programs for Sewer System and Wastewater Treatment Facilities (All Other Necessary Ordinances)
- Operations Contingency Plan for WWTPs
- Contingency Plan for Eslava Creek, Halls Mill, and Virginia Street Lift Stations and Force Mains
- Contingency Plan for Wastewater Collection and Transmission Systems
- Pump Station Operation Program
- Corrosion Control Program
- Pump Station Preventative Maintenance Program
- Force Main Preventative Maintenance Program
- Gravity Line Preventative Maintenance Program
- Maintenance of Rights of Way Program
- Coordination with the City of Mobile and Other Governmental Bodies

August 7, 2002 Program Corrections

- Correct CD Quarterly Report Volume 2 regarding implementation of Water Quality Monitoring Program February 28, 2002.

SECTION I: SUMMARY

- ADS Report on the flow monitoring of 20 private satellite collection systems was furnished to supplement information provided in July 31 submittal of Long Term Collection System Capacity Assurance Program. Schedules for implementing the remaining flow monitoring of private satellite collection systems were provided in the Long Term Collection System Capacity Assurance Program. Results of the aforementioned ADS report were not placed in the Program and were provided as an attachment to this August 7 submittal.

August 9, 2002 Program Modifications

- Due to the long-term plan to remove the Ziebach WWTP from service and the high cost of relocating the recycle stream, MAWSS proposed an alternative to apply the total cost of \$78,650 of relocating the recycle stream to either additional SEP 1 private property lateral replacements or additional rehabilitation work in the Ziebach area.

August 20, 2002 Corrections to August 9 Letter

- The post script to the August 9, 2002 letter should have stated that Williams WWTP fourth clarifier, which is required to treat the additional flows from the Ziebach WWTP following the Ziebach WWTP decommissioning, has been bid and awarded.
- A feasibility study for wastewater storage at the Board's Halls Mill, Eslava Creek, and Virginia Street lift stations is required to determine the need for and the effectiveness of such storage facilities at the aforementioned locations.
- Any product trials needed as identified in Montgomery Watson Harza corrosion control project (Task 2 and 3) report would occur after 9/31/02.

August 26, 2002 EPA Response to August 9, 2002 Program Modifications

- The EPA agreed to the request to apply the cost of relocating the solids handling recycle stream at the Ziebach WWTP to either additional SEP1 private property lateral replacements or additional rehabilitation. The EPA requested that they receive notification of the specific plan to apply the additional funds.

September 16, 2002 Board Response to EPA August 26, 2002 Comments

- The Board will apply the cost for relocating the recycle stream at the Ziebach WWTP to replace a minimum of 39 laterals in the Ziebach area.

SECTION I: SUMMARY

September 17, 2002 EPA Program Comments

- Conditional Approval of the Grease Control Program

September 27, 2002 Response to EPA September 17, 2002 Comments

- The Grease Control Program is being modified from the initial submittal to the EPA to address comments received from the EPA and the Alabama Restaurant Association.

November 26, 2002 Passage of Grease Control Ordinance

- The City of Mobile passed the Septage and Grease Hauler Ordinance requiring manifests for documenting proper disposal methods and disposal locations.

December 18, 2002 Letter to EPA

- Identified delays for the Florida Street and Kerr McGee Lift Station projects as a result of property acquisition issues.
- Identified completion dates for software upgrades to record data related to the parshall flume modifications and installation of dissolved oxygen sensors at the Williams WWTP.
- A request to relocate the Public Document Repository to the new Dennis Moore Training Facility was made.

3.2 Status of Implementation

Performance of Work (CD Chapter VIII)

Although the Board has not received final approval from the EPA on any of its submitted programs, the Board is proceeding with implementation of many of the programs submitted to the EPA. The Unscheduled Maintenance Program is the only program required by the CD that remains to be submitted to the EPA. It is not due until March 1, 2003. Additional information regarding the implementation of each program can be found in Section II of this report.

Under the Lift Station Action Plan provided to the EPA on April 29, 2002, Consultant Category 4 Tasks and Consultant Category 3 Tasks consisting of repair and replacement of electrical devices were scheduled for completion by December 31, 2002. The Board's consultant has experienced delays with the project and it will not be completed until January 31, 2003.

SECTION I: SUMMARY

On December 18, 2002, a letter was sent to the EPA identifying delays in modifying the Parshall flume and installing the dissolved oxygen (DO) sensors at the Williams WWTP. The additional sensors installed at the Parshall flume are working locally, but the computer software that converts the signals to flow has not been updated for the new sensors. This task was scheduled for December 16, 2002. The software upgrades are now scheduled for completion before January 18, 2003. Likewise, work is underway to configure the software to accept data provided by the new DO sensors. This task, originally scheduled for completion on January 15, 2003, will be completed on January 30, 2003.

Water Quality Monitoring (CD Chapter IX)

Implementation of the Water Quality Monitoring Program will begin following approval of the program by the EPA. Further information regarding these programs can be found in Section III of this report.

Supplemental Environmental Projects (CD Chapter X)

Service lateral replacements continue in two phases of SEP 1. Four construction projects are underway to complete SEP 1. SEP 2 money has been paid and is considered complete. MAWSS has transferred \$120,000 from an escrow account to the Alabama Forest Resources Center (AFRC). \$30,000 remains in the account waiting to be requested by the AFRC. MAWSS continues to wait for a request from Bay Watch to transfer money from the escrow account established for SEP 4.

Civil Penalties (CD Chapter XI)

The Civil Penalties, \$99,000 to the United States and \$15,000 to Alabama, have been paid.

Projected Long-Term Absence of the Collection Systems Manager

The Board's Collection Systems Manager, Tony Sneed, was called up for active duty in the Army Reserves. Mr. Sneed played a key role in the operation of the collection systems. Mr. Sneed's duties have been divided among the Board's other managers. The Board will continue to pursue the requirements of the Consent Decree by relying more on consultants during Mr. Sneed's absence.

**SECTION II: PERFORMANCE OF WORK
(CD CHAPTER VIII)**

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

1. System Capacity Assurance Program (SCAP) (CD Paragraph 20)

1.1 Short-Term Capacity Assurance Program for New Connections

1.1.1 Program Development

1.1.1.1 Wastewater Collection and Transmission Systems

The *Short-Term Collection and Transmission Systems Capacity Assurance Report* documenting proposed methodology for determining capacity was submitted to the EPA on December 21, 2001. On May 2, 2002, MAWSS received comments from the EPA regarding the program. MAWSS responded to the comments on May 29, 2002 and is awaiting final approval of the program.

1.1.1.2 Wastewater Treatment Plants (WWTPs)

The *Short-Term Capacity Assurance Program for WWTPs* was submitted to the EPA on December 21, 2001. On February 28, 2002, a follow-up report was submitted to the EPA documenting the results of the analysis and identifying WWTP Capacity Improvement Projects. Comments regarding the program were received from the EPA on May 2, 2002. MAWSS responded to the comments on May 29, 2002 and is awaiting final approval of the program.

1.1.2 Program Implementation

1.1.2.1 Wastewater Collection and Transmission Systems

While awaiting EPA approval of the methodology for determining capacity, information from the short-term program has been phased into the Long-Term Capacity Assurance Program for New Connections. Requests for new connections continue to be passed through Volkert and Associates for collection system capacity evaluation.

1.1.2.2 Wastewater Treatment Plants (WWTPs)

Capacity improvements identified in the program mentioned above are being pursued by the Board. The Board is on track with meeting the schedules identified in the program. The following projects are being pursued for each

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

wastewater treatment plant. Completion dates for each project are in parentheses.

C.C. Williams WWTP

Reduction of Industrial Loads (December 18, 2002)

MAWSS has completed modifications to the Industrial Pretreatment Program to reduce industrial loads. Feedback from questionnaires and meetings with industrial customers was used to assign surcharge fees and limits on pretreatment loading. New contracts for the program have been signed and the limits and surcharge rates went into effect on January 1, 2003. Initial estimates of possible BOD reductions were 9000 lbs/day. Upon receiving the questionnaires and placing new limits on permits, the revised reduction is calculated to be 6192 lb/day of BOD.

Centrifuge to Thicken Solids (December 31, 2002)

The centrifuge was placed in service on December 27, 2002.

Raise Splitter Box Weir (May 20, 2002)

Existing Splitter Box weirs have been raised.

Installation of Fixed Weirs at Splitter Box (January 15, 2003)

The installation of fixed weirs at the splitter box was completed on December 27, 2002 by Boh Brothers Construction as part of the Long-Term Capacity Assurance project to construct a fourth clarifier (see Section 1.2.2.1 of this report).

Parshall Flume Modifications (December 16, 2002)

Boh Brothers Construction has completed installation of new sensors and a dual input flow converter at the parshall flume. The sensors are installed and working locally; however, computer software that converts the signals to flow has not been updated. On December 18, 2002, the Board sent the EPA a letter describing the status of the modifications and gave a completion date of January 18, 2003 for the software upgrades.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

Installation of Online Dissolved Oxygen (DO) Meters (January 15, 2003)

Installation of DO meters to evaluate oxygen utilization within the reactors was completed by Boh Brothers Construction as part of the Long-Term Capacity Assurance project to construct a fourth clarifier (see Section 1.2.2.1 of this report). DO data will be collected for one year after the DO meters are installed to determine the need for additional oxygen. As with the parshall flume modifications, work is currently underway to configure the computer system to accept DO data. The Board sent a letter to the EPA on December 18, 2002 revising the completion date for the software upgrades to February 1, 2003.

Investigation of Polymer Utilization Systems (June 30, 2002)

Investigation results indicate polymer was not effective in improving capacity and, therefore, polymer addition will not be used.

Bill Ziebach WWTP

Project to Modify Recycle Lines (December 1, 2002)

Due to the commitment to remove the Ziebach WWTP from service by March 2004, relocating the recycle stream would only result in a minor short term benefit. On August 26, 2002 the EPA approved a request by MAWSS to be relieved of this obligation and to apply the cost of the modifications (\$78,650) towards the replacement of a minimum of 39 service laterals in the Ziebach basin under SEP 1 of the Consent Decree.

Wright Smith, Jr. WWTP

Investigate Improved Solids Handling Operations (July 31, 2002)

The new solids handling practices recommended by the investigation continue to reduce the amount of sludge being returned through the treatment system. Based on an average flow of 12 mgd, 2002 data indicate that the solids handling improvements have reduced influent BOD by 8,000 lbs/day.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

Reduction of Industrial Loads (December 18, 2002)

MAWSS has completed modifications to the industrial pretreatment program that will reduce industrial loads. Feedback from questionnaires and meetings with industrial customers was used to assign surcharge fees and limits on pretreatment loading. New contracts for the program have been signed and the limits and surcharge rates will go into effect on January 1, 2003. Initial estimates of possible BOD reductions were 3000 lbs/day. Upon receiving the questionnaires and placing new limits on permits, the revised reduction is calculated to be 1885 lb/day of BOD.

MAWSS estimated that a reduction in BOD of 3,000 lbs/day can be achieved.

Raise Final Clarifier Weirs (August 1, 2002)

The project to raise final clarifier weirs in order to prevent submergence of the clarifier at high flow rates is complete.

Operational Modifications to the Filter Cleaning Strategy (June 10, 2002)

Filter cleaning modifications continue to improve BOD removal.

Operational Modifications to Enhance Primary Chemical Treatment (August 31, 2002)

Malcolm Pirnie has completed the bench-scale testing program to investigate the benefits of enhanced primary treatment via chemical addition. The results of the test indicate improved capacity if the chemical is added during cold weather and peak flow events. Based upon favorable results from the investigation, MAWSS is pursuing the acquisition of Ferric Chloride and chemical-feed equipment for long term use.

Investigation of Polymer Utilization Systems (June 30, 2002)

Investigation results indicate polymer was not effective in improving capacity and, therefore, polymer addition will not be used.

Modify Recycle Lines (January 1, 2003)

On November 15, 2002, SJ&L, Inc. completed modifications to sludge recycle piping to remove plant recycled sludge from influent sampling.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

1.2 Long-Term Capacity Assurance Program for New Connections

Reports for both the Long-Term Capacity Assurance Program for Wastewater Collection and Transmission Systems and the Long-Term Capacity Assurance Program for WWTPs were submitted to the EPA for approval on July 31, 2002. Under the Long-Term CAP, hydraulic modeling uses flow data to determine the impact of proposed future connections on system capacity as defined by the Short-Term CAP.

1.2.1 Wastewater Collection and Transmission Systems

1.2.1.1 Permanent Flow Monitoring

Long term flow monitors and rain gauges have been installed in accordance with the dates provided in the Long Term CAP for the collection and transmission systems. A total of 67 flow meters and 10 rain gauges are being used in the system. The February 2003 semi-annual recalibration of each hydraulic model will incorporate flow data recorded since May 2002.

MAWSS also maintains 26 portable flow meters and 4 portable rain gauges. As analysis of the permanent flow meter data identifies areas of significant infiltration and inflow (I/I), the portable flow meters and rain gauges can be used to further isolate the I/I sources. The additional data from these portable meters is used to enhance calibration of the hydraulic models and to more efficiently direct identification of I/I sources.

1.2.1.2 Identification of Collection System Capacity

Volkert and Associates has completed calibration of the hydraulic models for each sewer basin within the Board's service area. New requests for service are being routed from the Board to Volkert for collection system capacity assessment. The models will continue to be updated as new flow monitoring data is available.

Three Mile Creek Basin

Results from the initial modeling analysis indicate the lower portion of the Three Mile Creek Interceptor sewer is near capacity. The build up of sediment and debris in the line has hindered performance. The line is currently being cleaned and video taped by SIS, Inc.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

The cleaning project will be completed by March 31, 2003. After the line is cleaned, the Board will repair I/I defects identified by TV inspection and accrue gained capacity from the removal of I/I at a ratio of 1 gpm of gained capacity to 2 gpm of I/I removed. Following the cleaning and I/I repairs, the Board will re-assess the performance of the interceptor.

Halls Mill Creek Basin

Initial hydraulic analysis of this basin did not identify any capacity issues. A capacity request from the Ten Ninety Joint Venture commercial development was approved September 30, 2002. Analysis of a more recent request, Spring Grove subdivision, approximately 283 units, indicates that an 8-inch interceptor will exceed capacity if this development connects. The Board is performing a 90-day flow monitoring study to determine if significant I/I sources can be identified and eliminated to accommodate Spring Grove. Evaluation of this data will determine if rehabilitation will be sufficient to allow new connections in the area in accordance with the 2 for 1 I/I credit previously proposed to the EPA.

Eslava Creek Basin

Initial hydraulic analysis of this basin did not identify any capacity issues. There have been numerous single home capacity requests within the last quarter. These requests are still being evaluated.

Virginia Street Basin

Initial hydraulic analysis of this basin did not identify capacity issues. One of the largest wastewater capacity requests has come from the proposed RSA Tower development, a high rise office building, which is proposed to discharge into the existing Water Street Lift Station. The lift station will need to be upgraded to accommodate the flow from the tower. Capacity improvements to the gravity system may be required. Capacity analysis of the downstream gravity sewer is underway.

Ziebach WWTP Basin

Initial hydraulic analysis of this basin's collection system did not identify any capacity issues. The WWTP has capacity limitations at wet weather peak

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

flows. A number of single home capacity requests have received and are being accepted contingent upon the completion of proposed improvements to the Perch Creek Lift Station and a new force main to the Williams WWTP. Further information regarding the work to remove the Ziebach WWTP from service and transport flows to the Williams WWTP can be found in Section 1.2.2.2 of this report.

Theodore Area Basin

Initial hydraulic analysis of this basin did not identify any capacity issues. This capacity analysis included the installation of a new lift station at Kerr McGee. Capacity requests are being accepted contingent upon the completion of the new Kerr McGee Lift Station in 2003. Further information regarding this project can be found in Section 8.1 of this report.

Eight Mile Creek Basin

The model was created and calibrated based on new flow monitoring data from flow meter EM_01. The initial capacity analysis of this basin did not identify any capacity issues. The basin's capacity is limited by the capacity of the Three Mile Basin and the Smith WWTP. The Board continues to analyze the impact of the Semmes 6-inch force main on capacity. A capacity request from Magnolia Heights was approved on October 7, 2002 based upon the use of the severe weather attenuation tanks (SWATs).

1.2.1.3 Information Management System for Calculating the Net (Cumulative) Increase or Decrease in Wastewater Volume

Volkert and Associates is maintaining the "Capacity Bank" for the Board's wastewater collection and transmission systems. New requests for service are routed through the Board's Mapping and Connections Department and then to Volkert for capacity analysis.

1.2.1.4 Identification and Elimination or Reduction of Industrial and Other Stormwater Discharges

A report on Industrial Stormwater Discharges was submitted to the EPA on December 21, 2001. On May 2, 2002, MAWSS received comments from the

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

EPA regarding the program. MAWSS submitted responses to these comments on May 29, 2002.

Private Sanitary Sewer Systems

MAWSS completed its first flow monitoring study for twenty (20) customers with private sanitary sewer systems. The report was provided to the EPA on August 7, 2002. Site investigations for the remaining customers were completed on December 31, 2002. 107 private sanitary sewer systems were investigated. These investigations identified 167 points of discharge into the MAWSS collection systems. Initial monitoring of the private sanitary sewer systems will be completed by December 31, 2004.

The Board continues to work with Volkert and Associates, Inc. to determine penalty assessments for excessive discharge of storm water. Once these have been determined, letters will be sent to the private sanitary sewer systems detailing the program and the penalty fees.

Industrial Customers

The Board has completed the flow monitoring of industrial customers in December. A draft of the 45-day flow analysis is under review by MAWSS.

1.2.2 Wastewater Treatment Plants (WWTPs)

Several projects related to long-term capacity assurance are in progress. Completion dates for each project are in parentheses.

1.2.2.1 C.C. Williams WWTP

Infiltration and Inflow (I/I) Reduction Program

Work is ongoing to reduce influent flows to the plant by mitigating collection system I/I. During the past quarter, 18 manholes and over 18,350 feet of pipe were rehabilitated to prevent I/I from entering the collection system. This brings the yearly rehabilitation amounts to 210 manholes and over 60,200 feet of pipe. Additionally, closed circuit television inspection (CCTV) was performed on 147,250 feet of pipe to determine sources of I/I. Further information on rehabilitation and maintenance activities and their impact on sanitary sewer overflows (SSOs) can be found in Appendix A-3 of this report.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

Build Fourth Clarifier (December 5, 2003)

Construction of a fourth clarifier will allow capacity for the addition of future customers in the Williams basin and the future conveyance of flows from the Ziebach Collection System. The project was awarded on August 19, 2002 to Boh Brothers Construction. In addition to constructing the fourth clarifier, the project includes the installation of fixed weirs at the splitter box, Parshall flume modifications, and installation of dissolved oxygen meters. For more information regarding the status of these additional projects see Section 1.1.2.2 of this report.

1.2.2.2 Bill Ziebach WWTP

Infiltration and Inflow (I/I) Reduction Program

Work is ongoing to reduce influent flows to the plant by mitigating collection system I/I. During the past quarter, 15 manholes and 300 feet of pipe were rehabilitated to prevent I/I from entering the collection system. This brings the yearly rehabilitation amounts to 81 manholes and 11,900 feet of pipe. During this past quarter, additional closed circuit television inspection (CCTV) was performed on 3,600 feet of pipe to determine sources of I/I. Further information on rehabilitation and maintenance activities and their impact on sanitary sewer overflows (SSOs) can be found in Appendix A-3 of this report.

Modify Perch Creek Lift Station (January 9, 2004)

Volkert and Associates is continuing to design modifications to the lift station in order to facilitate the removal of the Ziebach WWTP from service. Delays in the design process have occurred due to issues regarding easement acquisitions. To date, 56 easements have been obtained and 17 are in condemnation proceedings. Also, the Board has held 4 meetings with the Mobile Airport Authority as part of the efforts to resolve easement issues. Once all easements are obtained and condemnation proceedings are complete, the impact of these delays on the project can be determined.

Remove Ziebach WWTP From Service (March 26, 2004)

Following completion of the Perch Creek Lift Station modifications and the installation of the fourth clarifier at the Williams WWTP, the Ziebach WWTP

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will be removed from service. Decommissioning the Ziebach WWTP will allow abandonment of the Ziebach NPDES discharge permit.

1.2.2.3 Wright Smith, Jr. WWTP

Infiltration and Inflow (I/I) Reduction Program

Work is ongoing to reduce influent flows to the plant by mitigating collection system I/I. During the past quarter, 35 manholes and over 7,000 feet of pipe were rehabilitated to prevent I/I from entering the collection system. This brings the yearly rehabilitation amounts to 189 manholes and 21,700 feet of pipe. Additionally, closed circuit television inspection (CCTV) was performed on 77,000 feet of pipe to determine sources of I/I. Further information on rehabilitation and maintenance activities and their impact on sanitary sewer overflows (SSOs) can be found in Appendix A-3 of this report.

Plan to Relocate Effluent Discharge (December 18, 2002)

On November 2, 2002, the Board hosted a field trip for 20 of the Plateau Community residents to a wastewater treatment facility in Pascagoula Mississippi and to the aerated stabilization basin (ASB) at IP as part of an effort to address concerns regarding odor and environmental impacts. The field trip showed the successful integration of a regional wastewater treatment plant within the surrounding residential and commercial neighborhoods. Some views were tempered by observing dozens of homes within 100 yards of the Pascagoula WWTP, which is operating relatively free of odor and noise, and noting that the proposed IP sited was almost a mile from any residence. A follow-up meeting to tour the MAWSS Smith WWTP and see a microbiology exhibit of the wastewater treatment process was held January 6, 2003, with ten Plateau residents attending. Continuing communication with this community will become a part of our overall community involvement program as this project progresses.

Proposed Regional WWTP on the International Paper (IP) Site

MAWSS and IP met on December 5, 2002 to further develop plans for IP's closure of the 90 acre ASB and the transfer of this property (147 acres and a

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

60 MGD outfall line to the Mobile River) to the Board. The schedules for the closure and future use of the site for a regional wastewater treatment plant are linked to authorization and funding requests to fill the ASB with maintenance dredge material from the Mobile River. These requests as well as another to support a cooperative \$12 million lift station and force main project for MAWSS, the Prichard Water Works and Sewer Board, and the Chickasaw sewer system will be considered by the 2003 US Congress in the first months of 2003.

Design and easement acquisition for the lift station and force main to transfer Smith WWTF effluent to the IP outfall continues, with bidding possible as early as March 2003. Congressional budget delays and the absence of a formal association with the Prichard Water Works and Sewer Board (and their participation) give cause for concern about support for funding this regional project. MAWSS does not have the funds for the entire project and will postpone the work if sufficient funding is not identified prior to the projected March bid date. Should that be necessary, MAWSS will identify interim means and schedules to provide additional capacity at the Smith WWTF and for the Smith interceptor.

2. Sanitary Sewer Overflow (SSO) Reporting, Notification & Record Keeping Program (CD Paragraph 21)

2.1 Program Development

The *Sanitary Sewer Overflow Reporting, Notification and Record Keeping Program* was submitted to the EPA on December 21, 2001. The Board continues to await approval of the program from the EPA.

2.2 Program Implementation

The Board continues to report overflows to ADEM, the Storm Water Authority, Bay Watch, and the Mobile County Health Department per guidelines set forth in the program submittal. This reporting includes a recent modification resulting from new ADEM regulations on SSO reporting that requires reporting of all SSOs reaching waters to the

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Mobile County Health Department regardless of SSO size or whether the SSO may imminently and substantially endanger public health. MAWSS continues to await EPA approval of the program.

2.2.1 SSO Information Summary

During the past quarter there were ninety-one (91) sanitary sewer overflows (SSOs). Of this amount, thirty-four (34) reached waters of the state or US waters. The remaining overflows were contained and returned to the collection system. Tables listing the overflow occurrences during the past quarter can be found in Appendix A-1. Additionally, the semi-annual analysis SSO trends for the wastewater collection and transmission systems are provided in Appendix A-3.

The Board has revised its standard specifications as result of the 2 overflows in the third quarter related to inadequate bypass pumping. Under the new specifications, the contractor must provide a bypass plan for review. The plan must show that bypass pumping equipment is sufficient to handle peak flows to the site. In the event a contractor causes an overflow, the Board reserves the right to require the contractor to place an ad in the Mobile Register accepting responsibility.

A total of 35 SSOs were directly related to 4 wet weather events that met the severe natural event criteria described by CD Paragraph 23a, *Contingency Planning Process*. Since September 22, 6 severe natural events have impacted the MAWSS collection systems. This frequency is significantly higher than that reasonably expected to occur over the course of six months. The following provides further information regarding the impact of the 4 events that occurred during the fourth quarter.

Severe Natural Event (October 26-27, 2002)

During this event, 4.17 inches of rainfall were recorded. Rainfall intensities of 1.59 inches in one hour and 0.70 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. This intense rainfall resulted in 16 infiltration and inflow related SSOs totaling approximately 741,165 gallons.

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Severe Natural Event (November 5, 2002)

During this event, 2.26 inches of rainfall were recorded. Rainfall intensities of 1.65 inches in one hour and 0.93 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. During this event, the Smith WWTP was forced to throttle back the influent due to a power loss. By redirecting a portion of the influent to the severe wet-weather attenuation tanks (SWATs), MAWSS staff successfully prevented any overflows.

Severe Natural Event (November 11, 2002)

During this event, 2.43 inches of rainfall were recorded. A rainfall intensity of 0.43 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Despite the intense period of rainfall, no SSOs occurred.

Severe Natural Event (December 31, 2002)

During this event, 4.42 inches of rainfall were recorded. This amount exceeded the 24-hour rainfall criteria for severe natural events. Rainfall intensities of 2.59 inches over two hours, 2.27 inches in one hour, 1.51 inches over 30 minutes, and 1.07 inches over 15 minutes, also exceeded the criteria for severe natural events described in CD Paragraph 23a. Due to the intense rainfall, 19 SSOs related to infiltration and inflow occurred totaling approximately 73,733 gallons.

3. Legal Support Programs for Sewer System and Wastewater Treatment Facilities (CD Paragraph 22)

3.1 Ordinance Program

3.1.1 Ordinances necessary to implement Short-Term Capacity Assurance Program

As stated in Paragraph 3.1.1 in Volume 2, 2002 of the Consent Decree Progress Report, there will be no ordinance requiring capacity assurance prior to building permit application approval by the City.

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3.1.2 Ordinances necessary to implement SSO Reporting, Notification and Record Keeping Program

An opinion stating that an ordinance is not required to implement the program was submitted to the EPA on February 28, 2002.

3.1.3 Ordinances necessary to implement the Grease Control Program

A proposed ordinance requiring septage and grease haulers to maintain manifests documenting proper disposal methods and locations was submitted to the EPA on May 29, 2002. Following modifications to the ordinance's wording by City staff, the Mobile City Council passed the Septage and Grease Haulers Ordinance on November 26, 2002.

3.1.4 Ordinances necessary to implement Water Quality Monitoring

MAWSS submitted a legal opinion to the EPA on June 27, 2002 stating that an ordinance is not required to implement the program.

3.2 Grease Control Program

3.2.1 Program Development

The Grease Control Program, developed by Thompson Engineering, was submitted to the EPA for approval on May 29, 2002. On September 17, 2002, the EPA provided conditional approval of the Board's Grease Control Program. A response to the EPA's comments was submitted on September 27, 2002. The response identified changes to the original program submitted to the EPA to address the concerns of the EPA and the Alabama Restaurant Association.

3.2.2 Program Implementation

The Board continues to initiate grease control contracts with food service facilities (FSFs). As of this status report, 901 contracts were delivered. 225 of the FSFs were removed from the program because investigations by MAWSS staff found that they do not perform food preparations on site. 653 FSFs have returned the signed contract. The remaining 23 FSFs are either still reviewing the contract or awaiting investigation of their facilities by MAWSS.

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3.3 Maintenance of Adequate Legal Staff

The Board has retained the law firm of Atchison, Crosby, Saad, and Beebe to assist the Board in interpreting and fulfilling the obligations under the CD. The firm has adequate resources and personnel to meet the needs of the Board in this regard.

4. Contingency Plan for Sewer Systems and Wastewater Treatment Facilities (CD Paragraph 23)

4.1 Wastewater Collection and Transmission Systems

4.1.1 Program Development

The *Contingency Plan for Wastewater Collection and Transmission Systems* was submitted for EPA approval on July 31, 2002. In addition to the Contingency Plan described above, the *Contingency Plan for Eslava Creek, Halls Mill, and Virginia Street Lift Stations and Force Mains* was also submitted for EPA approval on July 31, 2002. This program provides contingency planning for the Board's three primary lift stations.

4.1.2 Program Implementation

4.1.2.1 Preparedness Committee

Prior to the submittal of the program, the annual meeting of the Preparedness Committee was held July 26, 2002. The Committee again met on November 19, 2002 to examine the role of the Contingency Plan during the severe natural events that occurred during the third quarter of 2002. Much of this meeting focused on preparation activities for a severe natural event. Items discussed included the following:

MAWSS Dispatch Center - The MAWSS Dispatch Center will monitor the Coastal Weather Research Center (CWRC) for severe weather alerts. Following an alert, the Dispatch Center will be responsible for contacting the MAWSS personnel necessary to initiate emergency preparations.

Active Projects List – All active projects will be added to the MAWSS Standby Personnel List. Project information will include location as well as contact numbers for contractors and consultants. The contractors and consultants will

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

be notified following a severe weather alert and will be responsible for ensuring that the project site is maintained to minimize the weather's impact.

Contractor Accountability – A letter will be sent to the design consultants stating that MAWSS construction projects will be operated to minimize the impact of severe natural events.

4.1.2.2 Capital Improvements

A number of capital improvements are underway to eliminate or minimize collection and transmission system failures during emergencies and severe natural events.

Construction of the MAWSS Communications Center (September 30, 2002)

Construction of the MAWSS Communications Center was completed in September. The center provides a modern facility for dispatchers to receive emergency related calls and coordinate with emergency response crews. MAWSS has adjusted the dispatchers' schedules to provide more dispatchers for emergencies that occur after normal business hours.

Apply crushed stone to access roads for the Halls Mill and Eslava Pump Stations (September 30, 2002)

Crushed stone was applied to the access roads as recommended in the Contingency Plan.

Generator critical spare parts storage (September 30, 2002)

Critical spare parts for pump station generators have been inventoried and stored for emergency repairs.

SCADA and VFD critical spare parts storage (December 31, 2002)

Critical spare parts for SCADA and VFD are in inventory at the Board.

Add vehicle gates to the Eslava Pump Station (December 31, 2002)

The Board has completed work to relocate the fence and install additional access gates at the pump station.

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Inventory 48" and 36" force main repair sleeves (March 31, 2003)

MAWSS has requisitioned 24-inch, 36-inch, 48-inch, and 60-inch repair sleeves for the force main repair inventory. Delivery of the sleeves is expected during the first quarter of 2003.

Raise Halls Mill Pump Station access road above 100-year flood elevation (March 31, 2003)

MAWSS has completed this project to protect the access road from flooding.

Relocate Aerial Lighting at Eslava Pump Station (March 31, 2003)

On January 17, 2003, TC Broome was awarded the contract to relocate the aerial lighting at the pump station. It is anticipated that this work will be completed on schedule.

Feasibility Study to evaluate on-site wastewater storage at the three primary pump stations (June 31, 2003)

Work has not yet begun on this project.

Installation of Automatic Vehicle Locating (AVL) System (December 31, 2003)

The AVL System will allow dispatchers to track MAWSS vehicles and, in an emergency, to determine the closest crew to an emergency location for response. MAWSS has reviewed a number of systems and visited several organizations that use AVL. In addition to being monitored by dispatchers for emergency operations, the system will allow supervisors to monitor work performance. Approximately 100 units will be installed in vehicles. MAWSS is currently specifying the AVL system and anticipates Board approval in the first quarter of 2003.

Install Fourth Pump at Virginia Street Pump Station (December 31, 2003)

Malcolm Pirnie has been assigned the design work for the project.

Halls Mill and Eslava Pump Station Contingency Projects (July 1, 2005)

MAWSS will install bypass connections and isolation valves on the force mains for the Halls Mill and Eslava Pump Stations to allow for emergency

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redirection of flow. Volkert is currently developing a cost estimate for this project. Additionally, MAWSS will install a fourth pump and add generating capacity if needed at both the Eslava and Halls Mill Pump Stations.

Installation of emergency backup for pumps greater than 15 horsepower (December 31, 2005)

Emergency backup equipment including auxiliary power and diesel pumps are scheduled for installation at all pump stations greater than 15 horsepower. This program will begin in 2003.

4.2 Wastewater Treatment Plants

The *Operations Contingency Plan for WWTPs* was submitted for EPA approval on July 31, 2002.

4.3 Preparedness Training Program

Special training courses and annual field trials continue to be developed for implementation of the Contingency Plans. Following the severe natural events during the third quarter, modifications were made to operating procedures for the severe weather attenuation tanks (SWATs) operation procedures at the Williams WWTP. A field trial was conducted with the revised procedures to ensure that the modifications more efficiently redirect flows to the tanks.

5. Pump Station Operation Program (CD Paragraph 24)

The *Pump Station Operation Program* was submitted to the EPA on July 31, 2002.

5.1 Scheduled Pump Station Operation Program

The Pump Station Operation Program is being used to track operation schedules, priorities, record keeping forms, and performance measures.

A program to upgrade the pump station SCADA systems is underway and will be completed by July 31, 2003. Under the program, all pump stations with the exception of small single-user stations will be monitored via SCADA at the Williams WWTP. Monitoring, reporting, and alarming capabilities will be vastly improved by this project.

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5.2 Emergency Pump Station Operation Program

The Emergency Pump Station Operation Program was incorporated in the overall Pump Station Operation Program identified above.

6. Corrosion Control Program (CD Paragraph 25)

6.1 Program Development

The Corrosion Control Program was submitted to the EPA on July 31, 2002. The program emphasizes field investigations by Montgomery Watson Harza (MWH) and modifications to the Board's standard specifications and pretreatment program.

6.2 Program Implementation

Several tasks identified in the Corrosion Control program are currently being implemented.

Corrosion Control Tracking

- Formal training was conducted on September 30, 2002 to establish procedures for documenting odor investigations. Additionally, the Odor Complaint Investigation Form has been developed along with a database to track odor complaints and their corrective actions.
- The SSO/MS4 Event Reporting forms have been updated to include corrosion as a secondary cause of an overflow. Also, the implementation of the Corrosion Control Program has been added to the options for SSO corrective actions.
- The Sanitary Sewer Evaluation Survey field form has been updated to allow corrosion to be listed as a defect and to incorporate corresponding rehabilitation options.

Reduction of Industrial Loads

The industrial pretreatment questionnaire was modified and sent to industrial users on October 2, 2002 requesting information regarding their use of corrosive compounds. The questionnaire requested information including yard piping diagrams, a list of corrosive compounds, their storage, and the possible use of alternative compounds. Eight of the industrial users have not responded to the questionnaire. One user will be eliminated

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from the program when a letter is received from ADEM revoking their discharge permit. The other 7 have been contacted and have indicated that the questionnaire will be completed soon.

Modification of Standard Specifications

The Board modified its Standard Specifications in December and then advertised them for public comment. The revisions were approved by the Board on January 7.

Field Investigations

- MWH completed Odor and Corrosion Control Evaluation Task 2 & 3 on schedule as identified in the Corrosion Control Program submitted to the EPA on September 30, 2002. MWH's report has the following recommendations:

Short Term

- Investigate industrial discharges in Deer River, Kerr McGee, Old Military and International Paper Areas. This will be addressed through corrosive substance discharge limitations in the revised Pretreatment Program.
- Investigate pump run times at recommended stations to reduce retention times. This work will be completed by June 30, 2003.
- Rehab corroded wet wells according to the Lift Station Action Plan.
- Install drop pipes in recommended wet wells. This work will be completed, where possible, by June 30, 2003.
- Clean and maintain upstream grease traps. This is addressed in the Grease Control Program.

Long Term

- Conduct 90 day chemical addition pilot demonstrations at four lift station locations (hot spots): (1) Dog River Dr. S.; (2) Baker School; (3) Giblin Road; and (4) Virginia Street. These pilots will be completed by June 30, 2003.
- Implement full scale, cost effective chemical addition solution based on pilot results.
- Consider vapor phase treatment if results of pilot are inadequate or cost prohibitive to prevent odors.

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Monitoring and Preventive Maintenance

- Continue monitoring lift station hot spots for H₂S and odors
- Continue scheduled cleaning of gravity mains as a part of existing Gravity Line Preventive Maintenance Program.

7. Grease Control Program (CD Paragraph 26)

7.1 Program Development

The Grease Control Program was submitted to the EPA on May 29, 2002. The EPA provided conditional approval on September 17, 2002.

7.2 Program Implementation

The Board has hired Mobile Engineering to assist with implementing the Grease Control Program. As mentioned previously, the Board has received modified contracts executed by Food Service Facilities (FSF). The Board has held a number of meetings with the local chapter of the Alabama Restaurant Association (ARA). The Grease Control Program has been modified from its initial submittal to the EPA due to concerns of the ARA and comments received from EPA about the Program.

The Board began implementation of the Grease Control Program on October 1, 2002. As of December 31, 2002, the Board's staff and Mobile Engineering completed initial visits to 211 of the FSFs to review grease trap size requirements and provide training in grease disposal. During these initial visits, a Grease Control Program Manual was provided along with signage regarding proper disposal of grease. These facilities are required to begin submitting action plans by January 13, 2003 that provide details and a schedule for addressing undersized grease traps identified during the initial visit. Initial visits for the remaining FSFs will be completed during the first six months of 2003. Following completion of the initial visit and acceptance of the action plan, the Board staff will begin inspections for violations. Facilities that do not respond in a timely manner receive enforcement attention beginning with a registered letter of warning of suspension of service.

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In addition to the on-site training, the Board has prepared a training video to be incorporated into the Mobile County Health Department's annual training requirements for food handler permits. Copies of the video are also being provided to the FSFs.

7.3 Grease Control Compliance Table

The Grease Control Compliance Table is provided in Appendix A-2. The table lists FSFs under contract, the dates of the initial visits, required grease trap size, and actual grease trap size. As the Board's Grease Control Program proceeds, additional information including enforcement actions will be incorporated into the table.

8. Pump Station Preventative Maintenance Program (CD Paragraph 27)

8.1 Short-Term Pump Station Certification

Montgomery Watson Harza completed the evaluation of 116 lift stations as required in the CD. The findings are presented in the *Inspection and Evaluation of Lift Stations* report. The evaluation report was submitted to the EPA on April 29, 2002 with the required certification and a schedule for addressing the recommendations made by MWH.

The recommendations were incorporated into a *Lift Station Action Plan*. Tasks to address the recommendations were grouped according to priority rating. The following presents a summary of the tasks and their schedules for completion. Scheduled completion dates are in parentheses.

Clean Lift Stations (July 15, 2002)

DSH, Inc. continues to clean the lift stations according to quarterly, semi-annual, and annual production goals set by MAWSS staff. Board staff will clean lift stations as well.

In-House Category 4 Priority Tasks (July 31, 2002)

These tasks relate to general maintenance of lift station sites including mechanical and electrical devices. These tasks were completed on schedule.

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Consultant Category 4 Priority Tasks (December 31, 2002)

Category 4 Priority Tasks consists mainly of repair or replacement of electrical devices. On September 23, some Category 4 Priority Tasks were awarded to A&B Electric. This project is currently under construction. The remaining Category 4 Priority Tasks will be incorporated into larger lift station projects, such as those identified in Consultant Category 3 Priority Tasks.

SCADA System Upgrades (July 31, 2003)

A \$1.3 million project is underway to complete SCADA system upgrades. The new system will have expanded capabilities for reporting lift station status.

In-House Category 3 Priority Tasks (August 31, 2002)

In-House Category 3 Priority Tasks primarily address repair or replacement of valves by MAWSS personnel. This project was substantially complete on August 31, 2002. Two hand wheels were addressed after this date. All tasks are completed.

Consultant Category 3 Priority Tasks (December 31, 2002)

Consultant Category 3 Priority Tasks that are of an electrical nature are currently under construction in the same project for Category 4 tasks mentioned above. Other tasks including lining of wet wells, with the exception of Halls Mill, Eslava, and Virginia Street Lift Stations, will be completed May 30, 2003. Design of the Virginia Street Lift Station renovations is underway. Completion is expected by December 31, 2003. The Eslava and Halls Mill lift stations are being budgeted. Completion of these projects is expected by July 1, 2005.

In-House Category 2 Priority Tasks (December 31, 2002)

In-House Category 2 Priority Tasks primarily include repair of flow meters and replacing run-time meters. These tasks were completed according to the schedule.

Consultant Category 2 Priority Tasks (April 30, 2004)

Consultant Category 2 Priority Tasks involving building removal and major lift station renovations are assigned to Thompson Engineering, Inc. These tasks will be included with lift station refurbishment projects and will require two (2) years to complete. Design of the first phase of this project is 95 percent complete.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

In-House Category 1 Priority Tasks (December 31, 2004)

In-House Category 1 Priority Tasks include less critical improvements to lift station devices. These tasks are on schedule for completion by December 31, 2004.

Consultant Category 1 Priority Tasks (December 31, 2004)

Consultant Category 1 Priority Tasks are scheduled for completion by December 31, 2004.

Florida Street Lift Station Relocation (March 31, 2003)

All recommendations associated with the Florida Street Lift Station will be addressed in the construction of a new station. The current site of the lift station is adjacent to, and partially in, a truck entrance to the GAF and Building Materials Manufacturing Corporation (BMMC). Relocation of the site will address current vulnerabilities related to the heavy traffic nearby and occasional flooding. After considerable effort to acquire property for the new location without litigation, the Board recently concluded that condemnation is the only available means to allow this project to move forward. On December 18, 2002 the Board sent a letter to the EPA documenting the delays caused by the easement issues and requested a time extension for the project of 270 days following completion of condemnation proceedings. The Board is also contemplating renovating the lift station at its current location to expedite the project. Truck traffic and localized flooding will need to be addressed in the design if the station remains in its current location.

Kerr McGee Lift Station Replacement (August 31, 2003 revised)

Portions of this project were awarded to Construction Labor Services on October 7. Two properties in the project area had to be condemned. The final condemnation proceeding was recently concluded, allowing the Board to proceed with the final phase of the project. The project was initially subdivided into phases so that portions of the work could proceed while condemnation was underway. On December 18, 2002, the Board sent the EPA a letter describing the status of the project and the delays in acquiring property. As a result of the delays, the Board requested an extension of the completion date to August 31, 2003. The Board has not received a response to its request. All recommendations for the Kerr McGee Lift Station will be addressed by this project.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

Margaret Street and Baker High School Lift Station Upgrades (June 30, 2002)

Hemphill Construction Company has completed renovations for these lift stations.

Halls Mill, Eslava, and Virginia Street Lift Station Upgrade Schedule (July 1, 2005)

The schedule for upgrades of these lift stations was presented in the Pump Station Maintenance Program submitted to the EPA in August. As mentioned above, the Virginia Street lift station renovations are currently under design. Budget is being allocated for the Eslava and Halls Mill lift station renovations in 2004 and 2005.

8.2 Electrical Maintenance Program

Procedures for maintenance of electrical components have been developed and were included in the *Pump Station Preventative Maintenance Program* submitted to the EPA for approval on July 31, 2002. A database to track the performance of electrical maintenance is complete and in use.

8.3 Mechanical Maintenance Program

Procedures for maintenance of mechanical components have been developed and were also included in the *Pump Station Preventative Maintenance Program* submitted on July 31, 2002. A database to track the performance of mechanical maintenance is complete and in use.

9. Force Main Preventative Maintenance Program (CD Paragraph 28)

Development of the *Force Main Preventative Maintenance Program* was submitted to the EPA for approval on July 31, 2002.

9.1 Air Release Valve Maintenance Program

The Air Release Valve Maintenance Program has been developed. The program identifies the necessary personnel and equipment, documents procedures, and identifies maintenance performance measures. Air release valve locations are being determined during assessment of the force main inventory. MAWSS will begin identifying air release valves along the Halls Mill and Eslava Lift Station force mains in January 2003.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

9.2 Valve Exercise Program

The Valve Exercise Program has been developed to establish scheduling and procedures for the routine exercise of force main gate valves. Gate valves are also being identified during the force main inventory. Gate valves will be identified along the Halls Mill and Eslava Lift Station force mains along with the air release valves beginning January 2003.

9.3 Program Implementation

Force Main Valve and Line Maintenance Information Management System (December 31, 2002)

A database to track maintenance schedules for valve exercise and line maintenance has been completed. Data will be entered into the database as valve exercise and line maintenance activities begin.

Force Main Inventory (December 31, 2003)

The Lift Station Department has purchased equipment for the field location of force mains. Until this equipment arrives, the department will use equipment loaned from the water department to begin the location of the Halls Mill and Eslava Lift Station force mains. This work is currently underway.

Initial inspection and maintenance of force mains (December 31, 2004)

Initial inspection and maintenance of force mains will follow completion of the force main inventory.

10. Gravity Line Preventative Maintenance Program (CD Paragraph 29)

10.1 Program Development

Development of the Gravity Line Preventative Maintenance Program was submitted to the EPA for approval on July 31, 2002.

10.2 Program Implementation

During the past quarter, MAWSS cleaned over 325,300 feet of gravity sewer. This brings the yearly total for gravity line cleaning to over 1,315,700 feet. Additionally, during the

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

past quarter, television inspection was conducted on over 227,900 feet of pipe bringing the annual total to 926,100 feet (see Figure 10.2-1).

MAWSS rehabilitated 68 manholes and over 25,700 feet of pipe, bringing the yearly rehabilitation totals to 480 manholes and over 86,500 feet of pipe. Trends regarding the impact of maintenance and rehabilitation on the reduction of SSOs can be found in Appendix A-3.

11. Maintenance of Rights-of-Way Program (CD Paragraph 30)

11.1 Program Development

The Maintenance of Rights-of-Way Program has been implemented since 2001. Program documentation was submitted to the EPA for approval on July 31, 2002.

11.2 Program Implementation

The Board worked with 2 contractors to complete grass cutting at the treatment plants, lift stations, and other facilities. This work was contracted on October 1, 2002 and was completed at the end of the year. Contracting this work out has allowed the Board's Grounds and Maintenance Department to stay dedicated to clearing easements over gravity sewers and force mains. As stated earlier, the Lift Station Department has purchased but not yet received equipment for the field location of force mains. Equipment from the water department is being used until the purchased equipment arrives. Easements over force mains will be cleared as the force mains are located.

Gravity Sewer Easements

The Grounds and Maintenance Department continued to re-clear easements over gravity sewer lines. During the fourth quarter, 231,800 feet was cleared bringing the annual total for easement re-clearing to over 547,600 feet. This represents over 55% of the re-clearing work and leaves approximately 443,350 feet remaining.

During the course of this work, 137 gravity sewer defects were identified. These defects have been photographed and assigned to the wastewater repair department to determine a repair schedule.

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

Force Main Easements

Location and clearing of the Eslava and Halls Mill Lift Station force mains has begun.

Confirm Sewer Line Stream Crossings

As part of the new sewer GIS conversion project due for completion at the end of 2003, GPS efforts are underway to provide survey-grade locations of wastewater structures. During the fourth quarter, this work was focused in the Ziebach WWTP basin.

12. Unscheduled Maintenance Program (CD Paragraph 31)

12.1 Program Development

The Board has been implementing an Unscheduled Maintenance Program for a number of years. Efforts are currently underway to document the program and to incorporate program tracking with the Information Management System under development. The program is on schedule to meet the March 1, 2003 submittal deadline stipulated in the CD.

13. Coordination with the City of Mobile and Other Governmental Bodies (CD Paragraph 32)

13.1 Program Development

Thompson Engineering, Inc. and the Board have met with City, County, and State personnel to determine what information and coordination these agencies would like to see with the Board. The items needing coordination have been identified. The persons within each organization who are responsible for the coordination efforts have also been identified. A report of the coordination activity program was submitted to the EPA for approval on July 31, 2002.

13.2 Program Implementation

The Board continues to coordinate Right of Way (ROW) activities with the City. The Board's Mapping and Connections Department was moved under the Planning and Engineering Manager so that all new water and sewer projects could be tracked by one department and coordinated as necessary with the City, County, or State. The Board's

SECTION II: PERFORMANCE OF CONSENT DECREE WORK

construction inspectors and ROW representative to the City also work under the Planning and Engineering Manager.

**SECTION III: WATER QUALITY MONITORING
(CD CHAPTER IX)**

SECTION III: WATER QUALITY MONITORING

1. Establishing a Plan (CD Paragraph 33)

1.1 Program Development

The *Water Quality Monitoring Program* report was submitted to the EPA on February 28, 2002. Comments regarding the program were received from the EPA on May 30, 2002. MAWSS submitted responses to these comments on June 27, 2002 and is awaiting final program approval.

1.2 Program Implementation

The Board will use Barry Vittor and Associates to implement the program. Upon receiving the EPA's approval of this program, MAWSS will begin implementing the program.

2. Routine Water Quality Monitoring (CD Paragraph 34)

2.1 Program Development

The procedures for routine water quality monitoring of the Halls Mill, Eslava, Three Mile, Eight Mile, Ziebach, and Muddy Creek drainage basins were included in the *Water Quality Monitoring Program* report.

2.2 Program Implementation

Upon receiving the EPA's approval of this program, MAWSS will begin implementing the program.

3. Investigative Water Quality Monitoring (CD Paragraph 35)

3.1 Program Development

Investigative water quality monitoring procedures to determine the source of pollution indicated by public complaints or the Routine Water Quality Monitoring Program were included in the *Water Quality Monitoring Program* report.

SECTION III: WATER QUALITY MONITORING

3.2 Program Implementation

Upon receiving the EPA's approval of this program, MAWSS will begin implementing the program.

4. Water Quality Monitoring for Spill Impact (CD Paragraph 34)

4.1 Program Development

Procedures for water quality monitoring to determine the impact of unpermitted discharges were included in the *Water Quality Monitoring Program* report.

4.2 Program Implementation

Although Barry Vittor and Associates has been requested to do some water quality sampling as a result of SSOs, this program has not been formally implemented. Upon receiving the EPA's approval for this program, MAWSS will begin the program as described in the submittal and responses to the EPA.

**SECTION IV: SUPPLEMENTAL ENVIRONMENTAL PROJECTS
(CONSENT DECREE CHAPTER X AND APPENDIX A)**

SECTION IV: SUPPLEMENTAL ENVIRONMENTAL PROJECTS

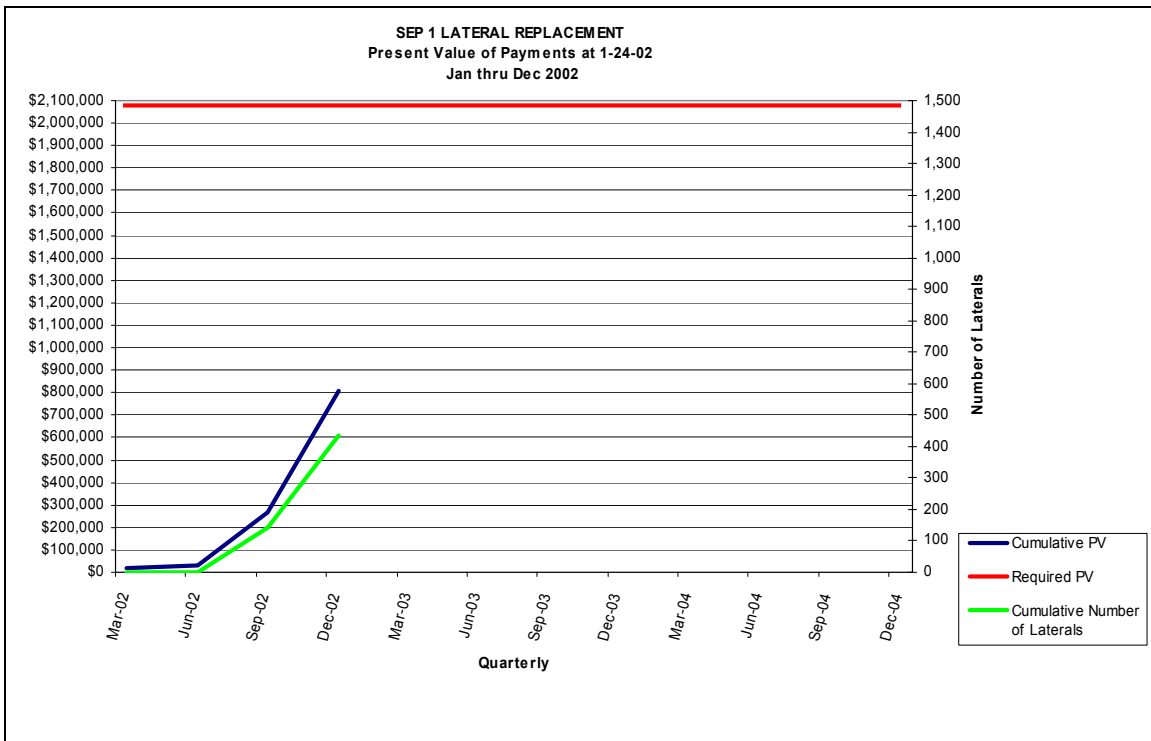
1. SEP 1: Installation of New Private Residential Service Laterals in Low Income Areas within the Board’s Service Area (CD Appendix A, Section I)

The Board continues to pursue completion of SEP 1. To date, \$829,503 has been spent towards the project. Work will continue until the \$2 million requirement for the project is met and the additional funds meeting the requirement of Appendix B of the CD are exhausted.

Figure 1-1 presents the current status of funding for the project. The chart indicates the number of laterals that have been installed prior to December 31, 2002 with the total present value on January 24, 2002 for all SEP 1 invoice payments by MAWSS. The chart shows the total number of laterals replaced (437). The present value reflects costs for only 265 laterals because all invoices for the 437 laterals have not been received.

As stated in Paragraph 1.1.2.2 of this status report, an additional \$78,650 has been allocated to the replacement of a minimum of 39 service laterals in Ziebach Mini-Basin ZB09, Sub-Basin B.

Figure 1-1: Present Value of Payments (SEP 1 Service Lateral Replacements)



SECTION IV: SUPPLEMENTAL ENVIRONMENTAL PROJECTS

Phase I

Under the Phase 1 contracts, 400 to 600 service laterals are scheduled for replacement. On January 31, the locations for implementing SEP 1 were submitted to the EPA. Phase 1 of the project consists of two separate mini-basins, one contract each, and was bid separately by Volkert & Associates, Inc. on June 10, 2002 and by Thompson Engineering, Inc. on June 24, 2002. Hughes Plumbing and Utility Contractors, Inc. was the low bidder for both projects. The projects were awarded on June 24, 2002 for Volkert's project and on July 8, 2002 for Thompson's project. Public meetings were held on June 10 at Yvonne Kennedy Auditorium and on June 11 at W.H. Leinkauf Elementary School to present this program to the affected public. To date, 503 Right-of-Entries (ROEs) have been obtained. The Contractor has completed 346 lateral replacements in Phase I.

Phase II

Phase II of the project consists of three separate mini-basins (in two construction contracts) and was bid separately by Volkert & Associates, Inc. on September 13, 2002 and by Thompson Engineering, Inc. on September 23, 2002. Public meetings were held on August 20 at Hillsdale Community Center, on August 22 at Elks Lodge #108, and on September 20 at Westlawn Elementary School. The projects were awarded on October 7, 2002. To date, 466 ROEs have been obtained. The contractor has completed 91 lateral replacements in Phase II.

Ziebach Mini-Basin ZB09, Sub-Basin B (January 31, 2004)

Replacing a minimum of 39 service laterals in the Ziebach Basin was approved by the EPA to offset the Board not performing recycle piping relocations at the Ziebach WWTP. \$78,650 is added to the \$2,000,000 required in SEP 1 for this purpose. The Ziebach lateral replacements will be bid in 2003.

2. SEP 2: Acquisition of Environmentally Valuable Habitat in Mobile County Through the Forever Wild Program (CD Appendix A, Section II)

A letter was received from the State of Alabama on May 6, 2002 requesting transfer of \$300,000 from the Board's escrow account to the Alabama Forever Wild Trust Fund for the purchase of property in Mobile County pursuant to SEP 2 requirements. On May 15, 2002, the US Department of Justice approved the disbursement. Subsequently, the funds were

SECTION IV: SUPPLEMENTAL ENVIRONMENTAL PROJECTS

transferred. As a result, the Board has completed the requirements of SEP 2 as stipulated by Paragraph 41 of the CD.

3. SEP 3: Acquisition of Environmentally Valuable Habitat in Mobile County, with a Preference for Property within the Dog River Watershed Area (CD Appendix A, Section III)

MAWSS placed \$150,000 in an escrow account for the Alabama Forest Resources Center (AFRC) on January 25, 2002. On November 7, Mobile Bay Watch requested approval from the US Justice Department for disbursement of \$120,000 to the AFRC. On November 22, 2002, the US Justice Department approved the request. Subsequently, on November 27, the Board authorized Regions Bank to mail the payment to the AFRC.

4. SEP 4: Creation and Maintenance of a Publicly Available Database of Water Quality Monitoring in the Mobile Delta (CD Appendix A, Section IV)

On January 25, 2002 MAWSS deposited \$50,000 into an escrow account for this SEP. As of the date of this report, no request for these funds has been made by MBW. MBW must receive written authorization from the US Justice Department and notify MAWSS of their electronic transfer account number to receive the funds.

SECTION V: CIVIL PENALTIES
(CONSENT DECREE CHAPTER XI)

SECTION V: CIVIL PENALTIES

1. Penalties to the United States (CD Paragraph 53)

\$99,000 plus interest was electronically transferred from MAWSS to the US Justice Department on April 22, 2002 to fulfill the United States Civil Penalty requirements of the Consent Decree.

2. Penalties to the State of Alabama (CD Paragraph 53)

A certified check for \$15,000 plus interest was sent certified mail to the Alabama Attorney General's Office on April 22, 2002 to fulfill the State of Alabama Civil Penalty requirements of the Consent Decree.

**APPENDIX A-1: SSO AND UNPERMITTED DISCHARGE TABLES
(CD PARAGRAPH 98)**

APPENDIX A-1: SSO AND UNPERMITTED DISCHARGE TABLES

Table 1: Sanitary Sewer Overflows **Not Reaching Waters** of the State or United States (October 1, 2002 through December 31, 2002)

Related to Severe Natural Events (see Section II, 2.2.1)

OCCURANCE ID	COLLECTION SYSTEM	DISCHARGE DATE	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	DISCHARGE LOCATION	CORRECTIVE ACTION
350	WILLIAMS	10/1/2002	BLOCKAGE (DEBRIS)	2	1200	MANHOLE	1400 OAK TREE CT	INSTALL MAIN LINE LINER
352	SMITH	10/7/2002	BLOCKAGE (GREASE)	1	300	MAIN LINE	1307 BARKER DR W	INSTALL MAIN LINE LINER
353	SMITH	10/12/2002	BLOCKAGE (GREASE)	1.25	30	MAIN LINE	3164 VALERIA ST	NO FURTHER ACTION
355	ZIEBACH	10/16/2002	BLOCKAGE (GREASE)	2	600	MANHOLE	2001 BRILL RD	PLACE ON 30 DAY CLEANING CYCLE
356	WILLIAMS	10/17/2002	BREAK	0.25	60	LIFT STATION	END PLAYGROUND DR (BENTBROOKE)	LIFT STATION REPAIR AND MAINTENANCE
358	SMITH	10/19/2002	BLOCKAGE (DEBRIS)	1	30	MANHOLE	7340 ZEIGLER BLVD	PLACE ON CLEANING CYCLE
362	SMITH	10/23/2002	BLOCKAGE (GREASE)	2	2400	MANHOLE	1209 WOLFRIDGE RD	POINT REPAIR
363	WILLIAMS	10/23/2002	BREAK	1.5	20	FORCEMAIN	2357 CHAPEL HILL	POINT REPAIR
365	WILLIAMS	10/24/2002	BLOCKAGE (GREASE)	0.75	875	MANHOLE	968 WESTBURY DR	PLACE ON CLEANING CYCLE
366	SMITH	10/24/2002	BLOCKAGE (GREASE)	2	240	MANHOLE	2914 BERKLEY AVE	NO FURTHER ACTION
367	SMITH	10/24/2002	BREAK	1.5	900	LATERAL	RIDGEWAY DR & RUBY ST	POINT REPAIR
382	WILLIAMS	10/26/2002	INFIL/INFLOW	1	5	MANHOLE	1708 MARENGO DR	CONDUCT I/I REHAB IN AREA
376	SMITH	10/27/2002	INFIL/INFLOW	8.75	52000	MAIN LINE	LAUREL @ DAVITT	CONDUCT I/I REHAB IN AREA
383	WILLIAMS	10/27/2002	INFIL/INFLOW	3	360	MANHOLE	561 JANWOOD DR	CONDUCT I/I REHAB IN AREA
381	SMITH	10/27/2002	INFIL/INFLOW	7.25	123750	MAIN LINE	TRUNKLINE @ SIFANGE "3MILE CK"	CONDUCT I/I REHAB IN AREA
380	SMITH	10/27/2002	INFIL/INFLOW	7.5	8900	MAIN LINE	TRUNKLINE @ END OF PARK AVE	CONDUCT I/I REHAB IN AREA
370	SMITH	10/27/2002	INFIL/INFLOW	6	5400	MAIN LINE	POPE @ BESTEDA	CONDUCT I/I REHAB IN AREA
379	SMITH	10/27/2002	INFIL/INFLOW	7	8400	MANHOLE	RIDGE RD E @ RIDGE RD	CONDUCT I/I REHAB IN AREA
377	SMITH	10/27/2002	INFIL/INFLOW	9.25	54500	MAIN LINE	CONTI @ DEMOUY	CONDUCT I/I REHAB IN AREA
375	SMITH	10/27/2002	INFIL/INFLOW	9.25	107500	MAIN LINE	MLK @ ROGER WILLIAMS - FOOTBALL FIELD	CONDUCT I/I REHAB IN AREA
374	SMITH	10/27/2002	INFIL/INFLOW	6.75	40500	MANHOLE	TRICENTENNIAL PARK @ LAKE DR	CONDUCT I/I REHAB IN AREA
373	SMITH	10/27/2002	INFIL/INFLOW	6.75	20250	MAIN LINE	TRICENTENNIAL PARK @ LAKE AVE	CONDUCT I/I REHAB IN AREA
371	SMITH	10/27/2002	INFIL/INFLOW	9.75	232500	MANHOLE	RIDGE RD S @ RIDGE RD E	CONDUCT I/I REHAB IN AREA
369	SMITH	10/27/2002	INFIL/INFLOW	6	5400	MANHOLE	POPE @ BESTEDA	CONDUCT I/I REHAB IN AREA
368	WILLIAMS	10/27/2002	INFIL/INFLOW	9.5	56500	MAIN LINE	MOHAWK & ELIZABETH ST	CONDUCT I/I REHAB IN AREA
372	SMITH	10/27/2002	INFIL/INFLOW	7	21000	MANHOLE	RIDGE RD W @ RIDGE RD S	CONDUCT I/I REHAB IN AREA
384	WILLIAMS	10/28/2002	BREAK	1	20	SERVICE	1712 CORDOVA DR	POINT REPAIR
387	SMITH	11/4/2002	BLOCKAGE (GREASE)	1	1500	MANHOLE	1104 PEABODY DR	INSTALL MAIN LINE LINER
388	WILLIAMS	11/5/2002	BLOCKAGE (GREASE)	1	60	MANHOLE	BOURGEOIS DR & AZALEA RD	INSTALL MAIN LINE LINER
390	SMITH	11/7/2002	BLOCKAGE (DEBRIS)	2	4200	MANHOLE	1710 CENTER ST @ HOSPITAL	PLACE ON CLEANING CYCLE
393	ZIEBACH	11/11/2002	BLOCKAGE (GREASE)	1	300	MANHOLE	1209 SHORE ACRES DR	PLACE ON CLEANING CYCLE
397	WILLIAMS	11/14/2002	BREAK	1	3119	MANHOLE	1209 BUENA DR	POINT REPAIR
398	SMITH	11/17/2002	BLOCKAGE (GREASE)	0.5	10	MANHOLE	1606 RUBY ST (LAMPHOLE)	NO FURTHER ACTION
399	WILLIAMS	11/19/2002	BREAK	1	25	FORCE MAIN	5570 RANGELINE RD	NO FURTHER ACTION
400	WILLIAMS	11/19/2002	BLOCKAGE (GREASE)	1.5	180	MANHOLE	4004 HALLS MILL RD	NO FURTHER ACTION
402	SMITH	11/25/2002	BLOCKAGE (GREASE)	0.5	50	CLEANOUT	1914 GOVERNMENT ST (AIRPORT & TOPIC)	NO FURTHER ACTION
403	SMITH	11/25/2002	BLOCKAGE (ROOTS)	0.75	750	CLEANOUT	3262 STEIN ST	NO FURTHER ACTION
406	WILLIAMS	11/27/2002	BLOCKAGE (DEBRIS)	0.5	100	FORCE MAIN	170 N. SCHILLINGER	NO FURTHER ACTION

APPENDIX A-1: SSO AND UNPERMITTED DISCHARGE TABLES

Table 1 Continued: Sanitary Sewer Overflows **Not Reaching Waters** of the State or United States (October 1, 2002 through December 31, 2002)

Related to Severe Natural Events (see Section II, 2.2.1)

OCCURANCE ID	COLLECTION SYSTEM	DISCHARGE DATE	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	DISCHARGE LOCATION	CORRECTIVE ACTION
407	SMITH	11/27/2002	BLOCKAGE (GREASE)	0.75	45	MANHOLE	3521 BROOKDALE DR S	PLACE ON CLEANING CYCLE
404	ZIEBACH	11/28/2002	BLOCKAGE (ROOTS)	0.5	200	MANHOLE	3359 MILDRED ST	POINT REPAIR
405	WILLIAMS	11/30/2002	BLOCKAGE (GREASE)	1	300	MANHOLE	836 BELTLINE HWY S	POINT REPAIR
408	WILLIAMS	12/2/2002	BLOCKAGE (GREASE)	0.5	30	MANHOLE	2302 TAYLOR AVE	NO FURTHER ACTION
410	SMITH	12/3/2002	BLOCKAGE (GREASE)	1	600	LATERAL	ESAU & BUTLER ST	NO FURTHER ACTION
411	SMITH	12/3/2002	BLOCKAGE (DEBRIS)	1	5	SERVICE	2410 CONE ST	NO FURTHER ACTION
412	SMITH	12/4/2002	BLOCKAGE (GREASE)	3	540	MANHOLE	3170 DAUPHIN ST	PLACE ON CLEANING CYCLE
413	SMITH	12/6/2002	BLOCKAGE (GREASE)	0.5	750	MANHOLE	4420 MOFFETT RD	NO FURTHER ACTION
415	WILLIAMS	12/9/2002	BLOCKAGE (GREASE)	1	300	MANHOLE	2986 ESLAVA CREEK PKWY	NO FURTHER ACTION
417	WILLIAMS	12/10/2002	BLOCKAGE (DEBRIS)	5	300	MAIN LINE	4100 GAYLARK DR N	NO FURTHER ACTION
418	WILLIAMS	12/11/2002	BLOCKAGE (GREASE)	3	90	CURB LEAK	4123 SPRINGDALE RD (FRONT)	POINT REPAIR
419	WILLIAMS	12/11/2002	BLOCKAGE (GREASE)	1	25	MANHOLE	1643 LEVENE RD	NO FURTHER ACTION
420	WILLIAMS	12/13/2002	BLOCKAGE (DEBRIS)	1	60	LAMPHOLE	1602 FAURE DR S	NO FURTHER ACTION
421	SMITH	12/17/2002	BLOCKAGE (GREASE)	0.75	400	MANHOLE	1100 STEVENS LN	NO FURTHER ACTION
423	SMITH	12/20/2002	BLOCKAGE (GREASE)	4	480	MANHOLE	1700 WOOD FOREST	NO FURTHER ACTION
424	WILLIAMS	12/21/2002	BLOCKAGE (DEBRIS)	2	300	FORCE MAIN	211 SCHILLINGER RD	NO FURTHER ACTION
427	WILLIAMS	12/26/2002	BLOCKAGE (ROOTS)	1	300	MANHOLE	962 WESTBURY	PLACE ON CLEANING CYCLE
425	WILLIAMS	12/27/2002	BLOCKAGE (GREASE)	6	2400	MANHOLE	6801 AIRPORT BLVD (PROVIDENCE HOSPITAL)	INSTALL MAIN LINE LINER
428	WILLIAMS	12/30/2002	BLOCKAGE (GREASE)	1	300	MANHOLE	4108 YORKSHIRE LN	PLACE ON CLEANING CYCLE

APPENDIX A-1: SSO AND UNPERMITTED DISCHARGE TABLES

Table 2: Unpermitted Discharges **Reaching** Waters of the State or United States (October 1, 2002 through December 31, 2002)

Related to Severe Natural Events (see Section II, 2.2.1)

OCCURRENCE ID	COLLECTION SYSTEM	DISCHARGE DATE	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	DISCHARGE LOCATION	FLOW DESTINATION (STREAM)	CORRECTIVE ACTION
349	SMITH	10/1/2002	INFIL/INFLOW	0.25	1000	MANHOLE	320 SIENNA VISTA ST	THREE MILE CREEK	NO FURTHER ACTION
351	SMITH	10/6/2002	BLOCKAGE (GREASE)	2	3600	MANHOLE	5049 DRUID DRIVE SOUTH	THREE MILE CREEK	INSTALL MAIN LINE LINER
354	WILLIAMS	10/15/2002	LIFT STATION FAILURE	0.5	650	LIFT STATION	301 YEEND STREET	ESLAVA CREEK	LIFT STATION REPAIR AND MAINTENANCE
357	WILLIAMS	10/20/2002	LIFT STATION FAILURE	0.5	8750	LIFT STATION	4315 GIBLIN ROAD	RABBIT CREEK	LIFT STATION REPAIR AND MAINTENANCE
359	ZIEBACH	10/20/2002	BLOCKAGE (GREASE)	1	3000	MANHOLE	3054 PICKELL DR	ROBINSON BAYOU	PLACE ON CLEANING CYCLE
360	WILLIAMS	10/20/2002	BLOCKAGE (SAND)	1	300	MANHOLE	310 SENG TAK STREET	THREE MILE CREEK	POINT REPAIR
361	WILLIAMS	10/20/2002	BLOCKAGE (GREASE)	6	720	MANHOLE	2120 HIGHLAND CT	BOLTON BRANCH	NO FURTHER ACTION
378	SMITH	10/27/2002	INFIL/INFLOW	7	4200	MANHOLE	TONLOURS DR @ LOWDOUS CIR E	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA
385	WILLIAMS	10/28/2002	BLOCKAGE (GREASE)	3	180	MANHOLE	1720 MARENGO DR	DOG RIVER	PLACE ON CLEANING CYCLE
386	WILLIAMS	11/1/2002	BLOCKAGE (DEBRIS)	2	600	MANHOLE	230 REDWOOD PLACE	MONTLIMAR CREEK	PLACE ON CLEANING CYCLE
389	WILLIAMS	11/6/2002	BLOCKAGE (GREASE)	1	500	MANHOLE	1724 GREEN FIELD CT	SPENCER BRANCH	INSTALL MAIN LINE LINER
391	SMITH	11/10/2002	BREAK	10	51600	MAIN LINE	307 SPRINGHILL WOODS DRIVE EAST	TWELVE MILE CREEK	POINT REPAIR
401	WILLIAMS	11/21/2002	BLOCKAGE (GREASE)	2	3600	MANHOLE	3651 CLAIRIDGE RD S	MONTLIMAR CREEK	PLACE ON CLEANING CYCLE
409	WILLIAMS	12/2/2002	BLOCKAGE (DEBRIS)	2	6000	MANHOLE	5417 ISABELLA WAY SO	HALLS CREEK	NO FURTHER ACTION
422	WILLIAMS	12/18/2002	BLOCKAGE (DEBRIS)	2.5	200	MANHOLE	3951 AZALEA RD	ESLAVA CREEK	PLACE ON CLEANING CYCLE
431	WILLIAMS	12/31/2002	INFIL/INFLOW	6	3600	MANHOLE	3153 RALSTON RD	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
432	WILLIAMS	12/31/2002	INFIL/INFLOW	6	3600	MANHOLE	RALSTON RD @ DOBBS AVE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
439	SMITH	12/31/2002	INFIL/INFLOW	4	4800	MANHOLE	BAXTER ST @ LEVERT ON EASEMENT	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA
447	SMITH	12/31/2002	INFIL/INFLOW	7	4150	MANHOLE	MONTEREY ST	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
446	WILLIAMS	12/31/2002	INFIL/INFLOW	0.5	78	MANHOLE	BROAD @ I-10	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
445	SMITH	12/31/2002	INFIL/INFLOW	1	325	MANHOLE	GOVERNMENT @ PARK TERRACE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
444	SMITH	12/31/2002	INFIL/INFLOW	6.25	3750	MANHOLE	CONTI & DEMOUY AVE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
443	SMITH	12/31/2002	INFIL/INFLOW	5	3000	MANHOLE	466 RIDGE RD W	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA
442	SMITH	12/31/2002	INFIL/INFLOW	5	3000	MANHOLE	467 RIDGE DR E	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA
430	WILLIAMS	12/31/2002	INFIL/INFLOW	7.5	4500	MANHOLE	ELIZABETH & MOHAWK	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
440	SMITH	12/31/2002	INFIL/INFLOW	5	15000	MANHOLE	462 RIDGE DR S	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA
448	SMITH	12/31/2002	INFIL/INFLOW	6	3600	MANHOLE	LAUREL & DAVITT ST	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
438	SMITH	12/31/2002	INFIL/INFLOW	0.5	125	MANHOLE	GOVERNMENT @ BREAMWOOD	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
437	WILLIAMS	12/31/2002	INFIL/INFLOW	1	1200	MANHOLE	2107 HIGHLAND CT	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
436	SMITH	12/31/2002	INFIL/INFLOW	7	4200	MANHOLE	2771 SHERWOOD DR S	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
435	SMITH	12/31/2002	INFIL/INFLOW	4.75	2850	MANHOLE	1051 LUBEL AVE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA
434	WILLIAMS	12/31/2002	INFIL/INFLOW	4.5	1375	MANHOLE	50 WESTWOOD ST @ HOMEWOOD	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
433	WILLIAMS	12/31/2002	INFIL/INFLOW	3	180	MANHOLE	CLEARMONT @ HOUSTON ST	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA
441	SMITH	12/31/2002	INFIL/INFLOW	6	14400	MANHOLE	SIENNA VISTA (DEAD END)	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA

**APPENDIX A-2: GREASE CONTROL TABLE
(CD PARAGRAPH 26)**

Grease Control Compliance Table
(Quarter ending 12/31/02)

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
141	Dairy Queen-#55	1000	1546	12/6/2002			
188	KFC - #406		1197	12/6/2002			
100	Burger King - #01198	1000	3990	12/5/2002			
206	McDonald's - #01412	5	3458	12/5/2002			
140	Dairy Queen - #44	0	2120	12/4/2002			
219	Mobile's Whistle Stop BBQ	1000		12/4/2002			
223	Mulligan's	1000		12/4/2002			
236	Outback Steakhouse - #1259	1750	2231	12/4/2002			
260	Ruby Tuesday's - #032	1000	4185	12/4/2002			
251	Providence Hospital	3000	7000	12/31/2002			
259	Roussos Restaurant		7875	12/31/2002			
279	Springhill Memorial Hospital			12/31/2002			
88	Backyard Café			12/30/2002			
117	China House Chinese Restaurant			12/30/2002			
138	Cuisine of India		1313	12/30/2002			
146	Dick Russell's Bar-B-Q	3500	4500	12/30/2002			
175	Hardee's - #1472	1000	2527	12/30/2002			
221	Morrison's Cafeteria - #5629		12968	12/30/2002			
233	Oliver's Restaurant	1000	3281	12/30/2002			
240	Pilot Travel Center #302 (Wendy's)			12/30/2002			
244	Pizza Hut - #2093	750		12/30/2002			
170	Gus's Azalea Manor Restaurant & Courtyard	1000	5775	12/3/2002			
222	Morrison's Fresh Cooking	1000		12/3/2002			
254	Richee's Bar-B-Que - #01	500	3591	12/3/2002			
391	Guido Guy Baking	1000		12/3/2002			
196	Lakeside Lodge			12/27/2002			
128	Ci Ci Pizza - #274		4275	12/23/2002			
187	KFC - #403	1000	1197	12/20/2002			
211	McDonald's - #04575	1000	2826	12/20/2002			
90	Bama Belles Restaurant	1000	1545	12/2/2002			
92	Barnhill's Country Buffett		8229	12/2/2002			
105	Captain's Table Restaurant		5250	12/2/2002			
158	Felix's Fish Camp at Pier 4	1500	8550	12/2/2002			
169	Gulf Seafood	2500		12/2/2002			

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
214	McDonald's - #10532	1000	3910	12/2/2002			
225	Nan Seas Restaurant	1500	1206	12/2/2002			
278	Spot of Tea	0		12/2/2002			
246	Pollman Bakery	0		12/19/2002			
162	Godfather's Pizza - #15	1000	4399	12/19/2002			
164	Godfather's Pizza - #22	450		12/19/2002			
167	Golden Corral - 0658	2000		12/19/2002			
174	Hardee's - #1407			12/19/2002			
247	Popeye's Fried Chicken - #01	1000		12/19/2002			
263	Ruby Tuesday's - #541	1250		12/19/2002			
113	Checker's - #8097	1000		12/18/2002			
129	Cock of the Walk	1000	6125	12/18/2002			
131	Copeland's			12/18/2002			
195	Lafayette's	400	210	12/18/2002			
205	McDonald's - #00122	1250	1929	12/18/2002			
212	McDonald's - #06223	1000	2826	12/18/2002			
235	Original Oyster House II	2500	4523	12/18/2002			
237	Papa George's Supper Club	5	656	12/18/2002			
255	Riverview Cafe & Grill	600		12/18/2002			
262	Ruby Tuesday's - #523	1000		12/18/2002			
294	No. 1 China Garden Super Buffet	1500		12/18/2002			
120	Chinese Kitchen	1000	1969	12/17/2002			
123	Church's Chicken - #0319	1000		12/17/2002			
130	Cogburn Health Center	500	6720	12/17/2002			
139	Dairy Queen - #37	0	1596	12/17/2002			
152	El Giro	400		12/17/2002			
201	Los Rancheros Mexican Restaurant - #01	500	4500	12/17/2002			
202	Los Rancheros Mexican Restaurant - #02	1500		12/17/2002			
203	Love Seafood	300	1596	12/17/2002			
150	Dreamland Bar-B-Que		4463	12/16/2002			
191	Krystal's - #5	1000	1995	12/16/2002			
209	McDonald's - #02812	1000	3325	12/16/2002			
456	Krystal's - #1	2000	4399	12/16/2002			
95	Big Time Diner	1500	2250	12/13/2002			
103	Burger King - #03703	1500	2727	12/13/2002			
125	Church's Chicken - #0458	1000	599	12/13/2002			

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
168	Gone Fishin's Cat Fish Restaurant - #01	1000	375	12/13/2002			
173	Hardee's - #1405		2860	12/13/2002			
176	Hart's Fried Chicken - #3	1000	375	12/13/2002			
177	Harts Fried Chicken - #4	1000	1268	12/13/2002			
192	Krystal's - #4556	2000		12/13/2002			
269	Shoney's Restaurant - #1152	500	16875	12/13/2002			
83	AMF Bowling Centers, Inc. - Florida Lanes	3000		12/12/2002			
104	Burger King - #06129		3059	12/12/2002			
135	Cracker Barrel - #094	1500	5340	12/12/2002			
161	Godfather's Pizza - #12	500	3072	12/12/2002			
172	Hardee's - #1346			12/12/2002			
250	Portier Place	1000		12/12/2002			
258	Roshell's Café & Deli			12/12/2002			
270	Shoney's Restaurant - #1154	1000	13163	12/12/2002			
245	Pizza Hut - #2097			12/12/200			
109	Pitcher's Restaurant & Lounge		3430	12/11/2002			
111	Checker's - #8091	1000		12/11/2002			
145	Dew Drop Inn Restaurant	1000	2633	12/11/2002			
160	GLI Food Service	1000		12/11/2002			
226	Neighbors Restaurant	1000	1488	12/11/2002			
248	Popeye's Fried Chicken - #03		2760	12/11/2002			
261	Ruby Tuesday's - #234	2000		12/11/2002			
275	Sonic Drive-In - #3211	1000		12/11/2002			
98	Bruno's - #327	1000		12/10/2002			
185	Kenny Rogers Roasters	1000	2514	12/10/2002			
208	McDonald's - #02325	1000	2826	12/10/2002			
116	China Doll Seafood	1000	3413	11/8/2002			
122	Chuck E. Cheese #5600		11521	11/8/2002			
199	Lone Star Steakhouse		3769	11/8/2002			
229	O'Charley's of Mobile - #402	1300	5940	11/8/2002			
148	Domino's - #5832	2		11/7/2002			
165	Golden China Restaurant	270	5625	11/7/2002			
200	Longhorn Steakhouse #68			11/7/2002			
157	Fazoli	1000	1988	11/6/2002			
190	Krispy Kreme - #489	1500		11/6/2002			
210	McDonald's - #03279	150	2544	11/6/2002			
207	McDonald's - #02324	1000	3192	11/4/2002			

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
368	Godfather's Pizza - #21	1000		11/4/2002			
273	Sonic Drive-In - #3500	1000		11/27/2002			
121	China Super Buffet	1500		11/26/2002			
243	Pizza Hut - #2092			11/26/2002			
256	Roadhouse # 37	2000		11/26/2002			
277	South China Restaurant	1500	1440	11/26/2002			
23	Burger King - #05522		599	11/25/2002			
181	International Trade Center		88	11/25/2002			
186	KFC - #402	1500	1696	11/25/2002			
241	Pizza Hut - #2088	1000		11/25/2002			
249	Popeye's Fried Chicken - #04	500	1796	11/22/2002			
133	Country Club of Mobile	1000	3518	11/21/2002			
252	Red Lobster - #40	2500	5625	11/21/2002			
264	Ruth Chris Steak House	2500	2625	11/21/2002			
108	Catalina Seafood	5	3000	11/20/2002			
153	El Monterrey	1750		11/20/2002			
216	Mikato Japanese Steak			11/20/2002			
238	Picadilly Cafeteria - #MOB		5067	11/20/2002			
267	Semolina International Pasta Restaurant	1000		11/20/2002			
271	Heron Lakes Counry Club	1000		11/20/2002			
24	Burger King - #06488	1000	702	11/19/2002			
44	Chubo's	300		11/19/2002			
115	Chili's Grill & Bar #552	1000	5625	11/19/2002			
166	Golden Corral - 0644	1000		11/19/2002			
178	Hooter's Restaurant		3128	11/19/2002			
424	Hungry Howie's Pizza - #3	6		11/19/2002			
99	Burger King - #04016		2793	11/18/2002			
171	Hall's Catfish & Seafood Restaurant	2000	2625	11/18/2002			
217	Mobile Greyhound Park			11/18/2002			
101	Burger King - #01489	1000	327	11/16/2002			
144	Denny's Restaurant			11/15/2002			
193	Krystal's - #6	1000		11/15/2002			
204	Marriott Courtyard	1000	540	11/15/2002			
96	Bojangles Bar & Eatery	100	3938	11/14/2002			
91	Banana Docks Cafe	1500	1875	11/13/2002			
231	Olive Garden - #1055			11/13/2002			
85	Applebee's Bar & Grill - #029	1000	4883	11/12/2002			

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
151	El Chico Restaurant - #91		5700	11/12/2002			
180	International House of Pancakes - #431	3000	4590	11/12/2002			
182	J R's Smokehouse	2000	4050	11/11/2002			
498	McDonald's - #28001		5107	11/11/2002			
136	Cracker Barrel - #439	6000	5820	11/1/2002			
194	Krystal's - #8	1000	2793	10/29/2002			
213	McDonald's - #06423	1000	3059	10/28/2002			
276	Sonny's BBQ	1000		10/28/2002			
118	China Moon	1000	2250	10/25/2002			
114	Chick Fil-A #762	1500	3325	10/24/2002			
82	American Café	500	5783	10/23/2002			
102	Burger King - #02483	1000	2793	10/23/2002			
127	Ci Ci Pizza - #229	1000	5040	10/22/2002			
84	Applebee's Bar & Grill - #025	1500	4388	10/21/2002			
86	Atlanta Bread Company	1000	4988	10/21/2002			
106	Carrabbas Italian Grill	1000	3525	10/13/2002			
6	Arby's - #1865						
7	Arby's - #1891						
8	Arby's - #5006						
9	Arby's - #6363						
11	Bangkok Thai Cuisine						
12	Bangkok Thai Cuisine - #2						
13	Banzai Restaurant						
14	Beijing Seafood Restaurant						
15	Bienville Club, Inc.						
16	Bilotti's						
18	Breezway Café, The						
19	Brick Pit, The						
21	Burger King - #11332						
22	Burger King - #00373						
25	Burlap Jack's						
26	Busaba's Thai Cuisine						
27	Butch Cassidy's Café						
30	Café 615						
31	Cajun Seafood						
32	Caribbean Spice						
33	Checker's - #8092						
34	Checker's - #8096						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
35	Checker's - #8099						
36	Checker's - #8102						
37	Chef King Restaurant						
38	Chicken Box						
39	Chick-fil-A						
40	China Chef						
41	China Doll Restaurant						
43	China Wok						
45	Chuck's Place						
46	Church's Chicken - #1592						
47	Cookie's by Design						
48	Curbside Café						
49	Derry's Ole Tyme Café						
66	Cremailere						
67	D. C. Barbeque - #2						
70	Dante's Pizza						
73	Dibella's Pizza						
76	Eats & Treats						
77	El Giro - #03						
78	El Mexicano						
87	Azalea Road Middle School						
89	Baker High School						
93	Bernice J. Causey Middle School						
94	Big E's Deli						
97	Bruno's - #323						
107	Carving Station						
110	Checker's - #8090						
112	Checker's - #8094						
119	China Star						
124	Church's Chicken - #0348						
126	Church's Chicken - #1067						
134	Country Fair Buffet						
137	Crowne Health Care						
143	Davidson High School						
147	Dickson Elementary School						
154	El Toro Mexican Restaurant						
155	Elsie Collier Elementary School						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
159	Food World - #3						
179	House of Chin						
184	Justine at the Pillars						
189	Krispy Kreme - #292						
197	Little Flower Cafeteria						
215	McDonald's - #13656						
218	Mobile Infirmary (East)						
220	Morningside School						
224	Davis Elementary School						
227	Hutchins Elementary School						
228	O'Charley's of Mobile - #311						
230	Old Shell Road School						
232	Dodge Elementary School						
234	Orchard Elementary School						
239	Picadilly Cafeteria - #MOBAH						
242	Pizza Hut - #2091						
265	Sabor a Mexico - #1						
266	Saucy-Q Bar B Que						
268	Shaw High School						
274	Sonic Drive-In - #3176						
280	St. Mary's Catholic School						
281	St. Paul's Episcopal School						
282	Steak N Shake - #435						
283	Steak N Shake - #451						
284	Taco Bell - #01970						
285	Taco Bell - #02306						
286	Taco Bell - #02655						
287	Taco Bell - #15450						
288	Taco Bell - #16180						
289	Taco Bell - #16300						
290	Taco Bell - #16961						
291	Taco Bell - #18144						
292	TGI Fridays - #1538						
293	The Bakery						
296	Tiny Diny						
297	Todd's Ramada & Conference Center						
298	UMS - Wright Preparatory						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
299	USA Children's and Women's Hospital						
300	USA Knollwood Park Hospital						
301	USA Medical Center						
302	Waffle House - #0178						
303	Waffle House - #0181						
304	Waffle House - #0241						
305	Waffle House - #0285						
306	Waffle House - #0289						
307	Waffle House - #0347						
308	Waffle House - #1303						
309	Wal*Mart - #853						
310	Wan Fu						
311	Wendy's - #202						
312	Wendy's - #203						
313	Wendy's - #204						
314	Wendy's - #205						
315	Wendy's - #207						
316	Wendy's - #209						
317	Wendy's - #211						
318	Westlawn School						
319	Whataburger - #104						
320	Wheelhouse Restaurant						
321	Winn Dixie # 578						
322	Winn Dixie # 590						
323	Winn Dixie # 591						
324	Wintzell's Oyster House - #01						
325	Wintzell's Oyster House - #02						
326	Woodcock School						
327	Church's Chicken - #0327						
328	Church's Chicken - #0358						
329	Church's Chicken - #1669						
336	Fairgrounds Concession Room						
337	Faith Academy Snack Bar						
340	First Assembly of God Day Care						
341	First Baptist Day Care #1						
342	First Baptist Day Care #2						
343	First Steps Playschool, Inc.						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
344	Fleamarket Mobile						
345	Fonde Elementary						
346	Fonvielle Elementary School						
349	Food World - #114						
350	Food World - #330						
351	Food World - #334						
352	Food World - #338						
353	Food World - #61						
354	Food World - #339						
355	For Pete's Sake						
357	Four Seasons Seafood Chinese Restaurant						
360	Fretwell's Kwik Stop						
362	G & S Subway, Inc.						
365	Garfield's / Dugout Bar & Grill						
366	Gator Pitt						
371	Golden Dragon Restaurant						
372	Gone Fishin' Catfish Restaurant - #06						
374	Government Street Baptist Child Dev. Center						
375	Grace Temple Pre-School/Day Care						
380	Grand Slam USA						
381	Green Fields Child Care						
382	Green Fields West, Inc.						
389	Griggs Elementary School						
392	Guido's						
393	Gulf States Sub Station II #3						
395	H & H Chevron #3						
396	Hall Elementary School						
399	Handy's Hickory House						
400	Hank Aaron Stadium - Concessions & Club						
401	Hankins Middle School						
404	Hardbody Café						
405	Hart's Fried Chicken - Commissary						
406	Hattie's Kitchen						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
408	Heartwarming Café						
409	Hennessy's						
410	Here We Grow						
412	Heroes Sports Bar & Grill						
414	Hillsdale Middle School						
416	Hollinger's Island Elementary School						
417	Holloway Elementary School						
418	Holy Family Cafeteria						
419	Hong Kong Island						
421	Howard Elementary School						
422	Hungry Howie's Pizza - #1						
423	Hungry Howie's Pizza - #2						
425	Iron Kettle, The						
428	James T. Strickland Youth Center						
429	Japan Cajun Grill						
430	Japanese Imperial Steak House						
431	Jessie E. Coleman Child Day Care						
433	John & Linda's Diner						
434	Johnny's Smokehouse						
435	K & S Convenience						
436	Kaffe Cathedral						
438	Katt's Christian Day Care & Child Development						
439	KFC - #407						
442	Kidds Klub Academy						
443	Kids & Company Learning Center						
444	Kids Clubs of America						
445	Kids Stuff Preschool						
446	Kid'z Kreation'z						
447	Kinder Care Learning Center #818						
448	Kinder Klub Learning Center						
449	King Chef						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
452	Knollwood Assembly of God Church School						
453	Koffee Kounter						
454	Konnitiwa Sushi Seafood & Steakhouse						
455	Korea Garden						
457	Krystal's - #3						
458	Kyle's Corner Stop, Inc.						
459	L J's Food To Go						
460	L. J. Conaway Adult Day Care Center						
463	La Petite Academy - #2						
464	La Pizzeria						
466	Lad & Dad Bakery Steak & Seafood Market						
469	Le Flore High School						
470	Leinkauf Elementary School						
471	Leona B. Warren Head Start Center						
473	Life Line Community Church						
474	Lil' Lunchbox and Café						
475	Lil Ones Day Care						
476	Linksman Golf Club						
477	Little Bears Day Care						
478	Little Kitchen, The						
479	Living Word Christian Center						
480	Loretta's						
481	Los Arcos Mexican Restaurant						
482	Lucky China						
483	Luigi's						
487	Mandarin Kitchen						
488	Mario's Original French Quarter						
489	Marshall's Donald Duck Day Care						
490	Martha Rutledge Catering						
491	Maryvale Elementary School						
492	Mattie's - #2						
493	Mayville Shack						
494	McAlister's Deli						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
495	McAlister's Gourmet Deli						
496	McDonald's - #16200						
497	McDonald's - #00332						
499	McDonald's - #03133						
502	McGill -Toolen High School						
504	Mediterranean Café						
506	Merri Mart - #010						
513	Michelle's Family Restaurant						
515	Midtown Café						
522	Minute Stop - #169						
524	Mobile Assoc. for Retarded Citizens						
525	Mobile Chop Suey						
526	Mobile Civic Center						
527	Mobile Convention Center						
528	Mobile Elks Lodge - #108						
529	Mobile Marriott						
530	Mobile Yacht Club						
531	Mobile YMCA Child Day Care						
532	Moffett Road Baptist Church						
534	Mom's Seafood						
536	Montgomery High School						
537	Brookley Elementary						
538	Most Pure Heart of Mary School						
539	Mother "Mary's" Family Restaurant						
540	Mrs. Wheat's Treats						
541	Mulherin Custodial Home						
542	Murphy High School						
543	Murray Hill Center, The						
544	Mystic Café						
547	N & N Food Market - #003						
552	Naturally Yours/Eats of Eden						
553	Nazarene Day Care						
554	New China Restaurant						
555	New Orleans PoBoys & Seafood						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
556	Oak Park Church of God School & Day Care						
557	Oasis Café						
558	Orchard Baptist Church Day Care Center						
559	Original Italian Pie, The						
560	Orleans Po Boys -#3						
561	Orleans Po Boys -#2						
562	Orleans Po Boys -#1						
563	O'Rourke Elementary School						
564	Osman's						
565	Our Lady of Lourdes Catholic School						
566	Overlook Kiddie Kare Day Care Center						
567	Panda Haven						
569	Papa John's Pizza - #384						
570	Papa John's Pizza - #514						
571	Papa John's Pizza - #687						
572	Papa John's Pizza - #816						
573	Papa's Wings						
574	Parker's Activity Center						
575	Pastry Shop, The						
578	Pat's Downtown Grill						
579	Peking Garden Restaurant						
580	Peking Restaurant						
581	Samir's Perfect Taste Café						
582	Pepperpots						
584	Phillips Middle School						
586	Picklefish - #1						
587	Picklefish - #2						
588	Pillians Middle School						
591	Pizza Hut - #2089						
592	Pizza Hut - #2090						
593	Pizza Hut - #2094						
594	Pizza Hut - #2095						
595	Pizza Hut - #2096						
597	Popeye's Fried Chicken - #02						
598	Popeye's Fried Chicken - #08						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
599	Providence Park Child Development Center						
600	Pugh's Christian Pre-School & Day Care						
601	Quatorze						
602	Queen G's Café						
603	Quintarez's Child Development						
604	Quizno's						
606	Rain High School						
607	Rainbow Child Center II						
608	Rainbow Child Center I						
610	Red Brick Café, The						
613	Residence Inn - Kitchen						
614	Rock of Faith Day Care & Learning Center						
615	Rodgers B-B-Q						
616	Royal Knight Restaurant & Lounge						
617	Royal Street Café						
618	Salvation Army, The						
619	Sam's Seafood Takeout						
621	Save A Lot						
622	Scarborough Middle School						
623	Schlotzsky's Deli						
624	Schlotzsky's Deli						
626	Seafood PoBoys						
629	Shell Food Mart - #122						
630	Shell Food Mart - #125						
632	Shepard Elementary School						
633	Sidney Chicken - #3						
640	Sonic Drive-In - #3212						
641	Sonic Drive-In - #3581						
651	Will Elementary School						
653	Sports Bar & Grill						
654	Springhill Avenue Baptist Child Ministry						
655	Springhill College Dining Hall						
656	Springhill Baptist Preschool						
658	St. Ignatius School						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
659	St. Mary's Home						
661	Steak-Out						
662	Stork's Nezt , The						
663	Sub King - #1						
664	Sub King - #2						
665	Sub King - #3						
666	Subway - #05937						
667	Subway - #18728						
669	Subway - #11688						
670	That's My School Child Care & Learning Center						
671	Subway - #12942						
672	Subway - #13264						
673	Subway - #16285						
675	Subway - #02138						
676	Subway - #07294						
681	Super Kids Learning Center, Inc.						
682	Target Stores - Deli/Bakery						
684	Sweet Inspirations						
686	Sweets Snack Shop						
690	Target Stores - #797 (Snack Bar)						
691	Taylor's Day Care Center						
692	Taylor's Kindercare						
694	Thai Orchid Restaurant						
696	Sam's Club - 8201						
697	Wal*Mart - #866						
698	Wal*Mart - #991						
699	Toddlers Academy Beginners School - #1						
700	Toddlers Academy Beginners School - #						
701	Training Station, The						
704	Austin Elementary						
705	Brazier Elementary						
706	Burns Middle School						
707	Continuous Learning Center						
708	Council Traditional School						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
709	Craighead Elementary School						
710	Denton Middle School- Crichton Campus						
711	Dunbar School for Creative & Performing Arts						
712	Eanes Middle School						
713	Eichold-Mertz Elementary School						
714	Evans Special School						
715	Forest Hill Elementary School						
716	Hamilton Elementary School						
717	Environmental Center						
718	Just 4 (Pre K)						
719	Regional School (Deaf & Blind)						
720	Semmes Elementary School						
721	Williams Elementary School						
722	Williamson High School						
723	Semmes Middle School						
724	Theodore High School						
725	Meadowlake Elementary School						
726	Allentown Elementary School						
727	Washington Middle School						
730	Tyner's Catering						
731	Uncle Simies Deli & Yogurt Shop						
732	University Oaks						
733	USA Dining Brookley						
734	USA Admin Snack #7238						
735	USA Freshen's University Center						
736	USA Mitchell Center Concessions 1-3						
737	USA Stanky Field Concession						
738	USA Support Kitchen & Concessions 4-6						
739	USA Delta Deli						
740	USA Food Court						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
741	Waffle House - #1503						
742	Waffle House - #1480						
743	Waffle House - #1165						
744	Waffle House - #1113						
751	VFW Post #49						
753	Vision Land Child Care Center						
755	Water Street Café						
756	Weinacker's Montessori School, Inc.						
758	Well's Quick Pic						
759	West Mobile Child Development Center						
760	Bay Birds Restaurant						
761	Wilmer Hall Episcopal Children's Home						
762	Wing Zone						
763	Wings of Life						
764	Winn Dixie - #1333						
765	Winn Dixie - #549						
766	Winn Dixie - #580						
767	Winn Dixie - #581						
768	Winn Dixie - #564						
769	Wok Express						
770	Woman's Clubhouse, The						
771	Woodridge Baptist Learning Center						
774	Yen Restaurant						
775	YMCA Cub Club Child Day Care						
777	Zitsos Cafeteria						
780	A. F. Owens Infra-Care						
781	Aimwell's Learning Tree						
783	Airport Blvd Baptist Day Care & PreSchool						
784	Alabama Baptist Children's Home						
785	Alabama School of Math & Science						
786	Alba Street Grocery						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
787	AMF Bowling Centers, Inc. - Skyline Lanes						
788	Atlantic Marine Cafeteria						
790	Azalea City Grill						
792	Bamboo Garden						
795	Beck's Day Care Center						
796	Bishop State Community College						
797	Southwest Technical						
798	Bloomin' Lollipops						
799	Brannan's Deli						
800	Bronco Bill's Supper Club						
804	Campus View Kids & Company						
805	Canton Chinese Restaurant						
807	Carver Court Day Care Center						
808	Chandler's Café						
809	Chantilly's Rock'N 50's						
810	China Chef Restaurant						
811	China Gourmet Express						
812	Chinatown Restaurant						
813	Cody Child Care						
814	Corpus Christi Catholic Day Care						
815	Delish's Desserts						
816	Dixie Company Warehouse, The						
817	Domino's Pizza						
818	Domino's Pizza						
819	Domino's Pizza - 5830						
820	Domino's Pizza - 5831						
821	Domino's Pizza - 5833						
823	Whataburger - # 792						
825	Bay Pointe Hospital & Children's Residential						
826	Allen Memorial Home						
827	Bay Manor Health Care Center						
829	Gordon Oaks Health Care Center						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
830	Hearthstone at Heritage Woods						
832	Sea Breeze Nursing Home & Rehab Center						
833	Springhill Senior Residence						
834	Twin Oaks Nursing Home						
835	Central Baptist Church						
836	College Park Baptist Church						
837	Cottage Hill Baptist Church						
840	Dayspring Baptist Church						
842	First Baptist Church of Mobile						
843	Government Street Baptist Church						
844	Shiloh Baptist Church						
845	Woodmont Baptist Church						
846	Friendship Baptist Church						
847	Government Street Presbyterian Church						
850	Christ United Methodist Church						
851	Dauphin Way United Methodist Church						
852	Ashland Place United Methodist Church						
856	Carmen's Child Care & Learning Center						
857	Child Day Care Assoc., Inc.						
861	First Independent Methodist School						
864	Montessori Academy of Mobile						
865	Phillips Temple Christian Academy & Child						
868	St. Paul's Episcopal Mother's Day Out						
869	That's My School						
872	Bethel Day Care Center						
873	Cecile's Sandwiches & Catering						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
874	Creekwood Church of Christ (Meals on Wheels)						
875	Mostly Muffins						
878	Sally's Seafood Restaurant						
879	China Chef II						
880	County Jail						
881	Beef Baron						
882	AMF Bowling Centers, Inc. - Camellia Lanes						
883	Battleship Galley, The						
884	Michael's Café 205						
885	Calloway-Smith Middle School						
886	Chastang Middle School						
887	Baker-Gaines Central Campus						
888	Carver Campus						
890	Mama's on Dauphin						
891	Arby's - #7315						
892	Spencer Elementary School						
893	El Charro						
894	Matt's Rib Shack						
895	Red Brick Café						
896	Hunan Chinese Restaurant						
898	The Hickory Pit						
900	The Purple Onion						
901	PHO88						
902	Alec Naman Catering						
903	Mellow Mushroom						
904	Fat-Zo Chicken						
905	Blimpie						
906	Everything & More						
907	David Rhodes Catering Service						
908	Classic American Cafeteria & Breakfast Buffet						
909	Janino's Fine Italian Cuisine						
910	Dr. Bob's Steakhouse						
911	International House of Pancakes						
912	McAuley Place						
913	Drayton's Place						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
914	Daddy Rick's						
915	Heavenly Ham						
916	Nuthouse, The						
917	Trademarc's						
918	Wal-Mart Neighborhood Market						
919	Bruno's - #310						
920	Best Grill Restaurant						
500	McDonald's - #00597						
FSF's Removed from Grease Control Program							
778	A & M Peanut Shop						
779	A B C Day Care Center						
782	A B C Kindergarten						
1	AFC Sushi						
2	Alexanders Grocery						
3	Alnimer Food Store						
4	Al's Hot Dogs & Other Fine Foods						
5	Angel Food Store						
10	Asia Market						
789	Austin's Country Palace						
855	Azalea City Christian School & Child Dev.						
791	B. J.'s Hot Wings						
824	Baptist Children's Home						
793	Bartlett House BBQ						
794	B-Bob's Downtown						
17	Breakers Billiards Inc.						
20	Brunch Express						
801	Buddy Grass's Seafood						
28	Butterbean Row Café & Lounge, The						
29	Cacho's S. American Grill						
802	Cake Celebrations						
806	Carmike 14 Theatre						
897	Carol's Restaurant & BBQ						
42	China Garden						
51	Cimarron Club						
52	Circle K - #4240						
53	Circle K - #4275						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
60	Circle K - #4336						
54	Circle K - #4472						
55	Circle K - #8244						
56	Circle K - #8248						
57	Circle K - #8256						
58	Circle K - #8258						
59	Circle K - #8263						
61	Comfort Inn - Kitchen						
62	Comfort Suites						
63	Confetti's						
132	Cornerstone Deli & Seafood Restaurant						
64	Cosmos						
858	Cottage Hill Presbyterian Pre-School						
65	Country Hearth						
859	Covenant Christian School						
838	Crawford Baptist Church						
860	Crawford Baptist Kindergarten						
68	D. I. P. Express						
69	Daddy O's						
142	Darryl's 1870 Restaurant & Bar						
839	Dauphin Way Baptist Church						
72	Days Inn Tillmans Corner - Kitchen						
71	De La Casa 100%						
50	D'Iberville Restaurant (CLOSED)						
149	Don Pablo's Mexican Restaurant						
822	Drayton Place (CLOSED)						
74	Drop Zone, The (CLOSED)						
75	Early Bird Restaurant						
80	Elizabeth's Courtyard						
156	Emperor Garden						
81	End Zone						
330	Express Convenience Store						
331	Express Gas						
332	Extended Stay America #155						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
333	Exxon - Express Mart						
334	E-Z Serve #4062						
335	E-Z Service #4063						
338	Family Inns of America						
339	Fancy Affairs Catering						
683	Fastime - #1						
841	First Baptist Church of Dawes						
347	Food Mart Meat Market						
348	Food Pak						
356	Foundation for Child Care, The						
358	Frannie's Place						
359	Frequency Breaker Club						
361	Fubar's						
363	Gabriel's						
364	Gan Shalom Preschool						
367	Gayles's Place						
163	Godfather's Pizza - #21						
370	Godfather's Pizza - Concession						
369	Godfather's Pizza - Hank Aaron Stadium						
373	Gourmet Galley, The						
503	Government St Presbyterian Church - Meals on Wheel						
376	Grace United Methodist Church Day Care						
377	Graffiti's II						
378	Grand Central						
379	Grand Mariner Marina						
386	Greer's - #25						
383	Greer's - #36						
384	Greer's - #39						
385	Greer's - #41						
387	Greer's Food Tiger - #21						
388	Greer's Food Tiger - #23						
390	Guest House Inn						
394	H & C Quick Stop						
398	Hampton Inn - Kitchen						
397	Hampton Inn I-65						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
402	Happy Days Child Care Center						
403	Happy Tymes Day Care						
407	Hayley's						
411	Heritage Inn						
413	Hideout, The						
415	Holiday Inn Express						
420	Hot Dogs "R" Us & More						
426	Jackson Street Café & Bar						
427	Jaime's Seaman's Club						
183	Jerry's Caterers						
432	Joe Muggs Coffee Shop						
437	Kane's Pit Stop						
440	Key West						
441	Kiddie Ranch						
862	Kingswood Creative Learning Center						
853	Kingswood United Methodist Church						
450	Kit Geil Catering						
451	Knights Inn						
461	L. A. Sports Café						
462	La Petite Academy - #1						
465	La Quinta Inn - #804						
467	Lassere's Catering & Cajun Seafood Shop						
468	Le Bistro Club						
472	Leo's Shop						
198	Little Saigon Traditional Vietnamese Cuisine						
484	Mack's Corner Store						
485	Malaga Inn						
486	Mama Nell's						
501	McDonald's Conoco II						
505	Melodies Lounge						
507	Merri Mart - #003						
508	Merri Mart - #004						
509	Merri Mart - #006						
510	Merri Mart - #008 - Conoco						
511	Merri Mart - #012						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
512	Michael's Takeout Seafood						
514	Midtown Bistro						
516	Minit Shop - #16						
518	Minute Stop - #164						
519	Minute Stop - #165						
520	Minute Stop - #166						
521	Minute Stop - #168						
517	Minute Stop - #171						
523	Mo Hot Dog						
863	Mobile Christian School						
533	Molette's Convenience Store						
535	Monsoon's						
546	N & N Food Market - #002						
548	N & N Food Market - #004						
549	N & N Food Market - #006						
545	N & N Food Market - (Texaco)						
550	N & N Food Mart Inc. #005						
551	Naman's Supermarket						
568	Papa Buddha's						
576	Pat & D. D.'s Old Shell Inn						
577	Pat's Deli & Yogurt						
583	Perfect Touch Catering						
585	Phillips Temple AOH Church of God						
589	Pit Stop 66 - #2						
590	Pizza Downtown						
596	Plateau Community Center						
876	Pollman's Bake Shop(2)						
877	Pollman's Bake Shop(3)						
848	Providence Presbyterian Church						
605	Racetrac - #242						
609	Rambo's Skateworld						
611	Red's Downtown						
612	Regency Chevron						
831	Rehab & Healthcare Center of Mobile						
253	Revere's Restaurant & Lounge						
257	Roberson's Cafeteria						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
620	Sandra's Homemade Candies						
625	Sclater Produce Mart/The Dawg House						
627	Shanghai Restaurant(CLOSED)						
628	Shell Food Mart - #120						
631	Shell Short Stop						
634	Sidney's Express						
635	Silver Ladle, Inc.						
636	Sinbad's Cuisine(CLOSED)						
637	Singleton Grocery						
638	Skyland Seafood						
639	Slow Cooking						
272	Solomons						
642	Soul Kitchen						
643	Spanky's Restaurant						
645	Spectrum Stores Inc. - #115						
646	Spectrum Stores Inc. - #116						
647	Spectrum Stores Inc. - #117						
648	Spectrum Stores Inc. - #118						
649	Spectrum Stores Inc. - #119						
644	Spectrum Stores Inc. - #121						
650	Spectrum Stores Inc. - #122						
652	Spencer House, LLC						
854	Springhill Avenue Temple - Reform						
657	St. Ignatius Child Care Program						
866	St. Luke's Episcopal School						
867	St. Mark United Methodist School						
660	St. Vincent De Paul School						
677	Subway - #04364						
889	Subway - #0715						
674	Subway - #16404						
678	Suite One of Mobile						
679	Sunshine Skate Center						
680	Super 8 Motel - Kitchen						
685	Sweet Things						

* Alternative devices may be used

PTID#	RESTAURANT NAME	Current GT Size	Required GT Size*	Inspection Date	Enforcement Actions Taken	Action Status	Action Outcome
688	Swiftly Serve - #0522						
687	Swiftly Serve - #4112						
689	T. P. Crockmier's 1890 Club						
693	Teddy Bear's Child Care						
695	Three Georges Candy Shop						
668	Tony's Express						
702	Trans Gulf Seafood						
728	Troopers						
729	Twice as Nice Professional Catering						
745	Valu Express #9						
746	Vanessa's Lounge						
747	Variety Seafood Distributors						
748	Veet's						
749	Velvet 258						
750	Venue, The						
752	Villager Lodge						
754	Washington Ave Convenience Store						
757	Weinacker's Montessori School, Inc.						
849	Westminster Presbyterian Church						
871	Word of Life Church						
772	Wynsong-16 Mobile						
773	Yellow Rose						
776	Zebra Lounge						

* Alternative devices may be used

**APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND
TRANSMISSION SYSTEMS AND WWTFs
(CD PARAGRAPH 26)**

APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

1. Introduction

The following semi-annual analysis of wastewater collection and transmission systems and wastewater treatment facilities meets the requirements set forth in Paragraph 23 of the CD. For the analysis, quarterly SSO and Unpermitted Discharge totals for 2002 were compared with the ongoing efforts by MAWSS to reduce these overflows.

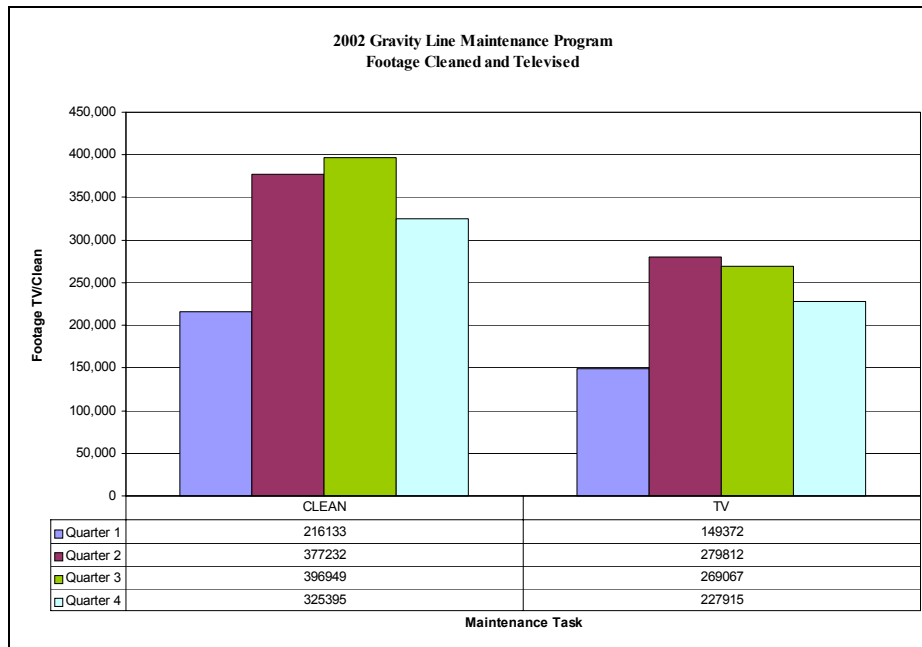
2. Trends in Rehabilitation, Operation, and Maintenance

2.1 Gravity Line Maintenance

2.1.1 Hydraulic Cleaning

Over 1,315,700 linear feet (LF) of gravity sewers were cleaned during 2002. A portion of this total (262,200 LF) represents multiple cleaning of lines on frequent cleaning cycles such as inverted siphons and sand traps. Hydraulic cleaning production reached its peak during the third quarter. The slight decline in the fourth quarter represents a decline in production from the cleaning contractors as they reached the end of their annual contracts. Excluding the multiple cleaning of lines during the year, approximately 16% of the gravity sewers were cleaned during 2002. The average quarterly cleaning total was almost 329,000 feet.

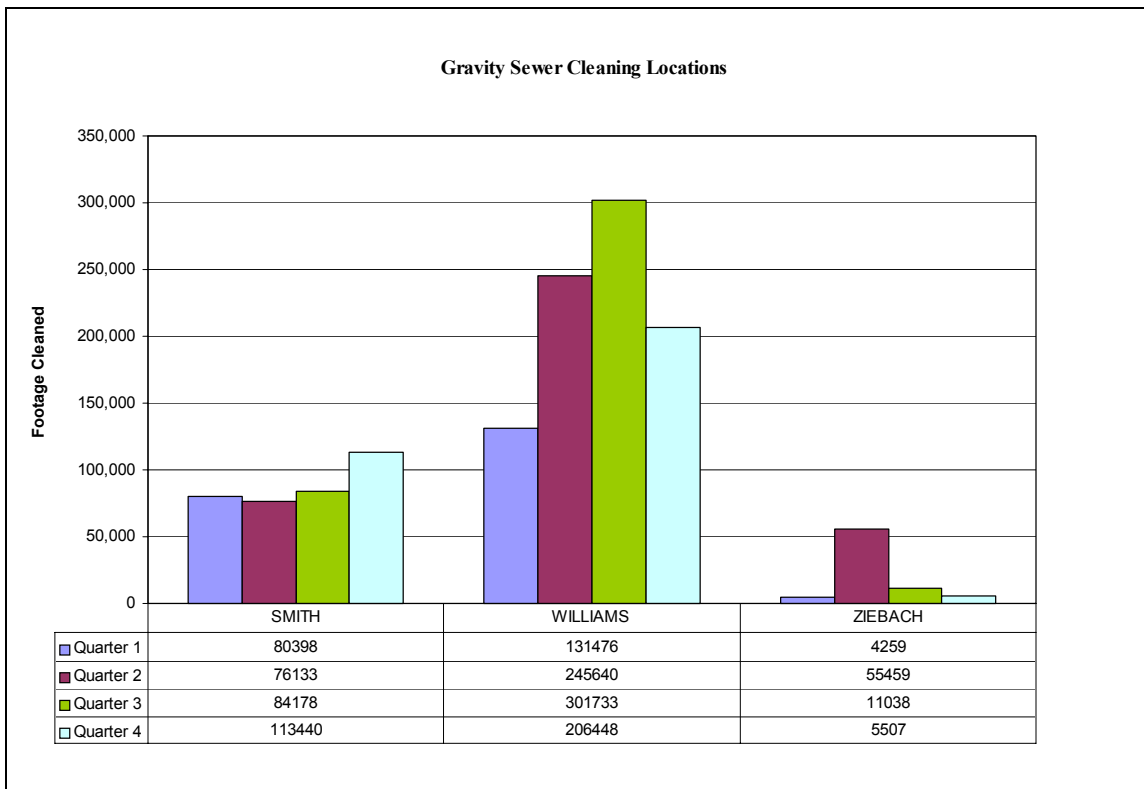
Figure 2.1.1-1: Footage of Gravity Sewer Cleaned and Televised



APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

Approximately 67% of the cleaning efforts were focused in the Williams WWTP basin. Cleaning activities in the Smith WWTP basin remained relatively steady with a slight increase during the fourth quarter. Hydraulic cleaning in the Ziebach basin reached its peak in the second quarter but fell during the third and fourth quarter to levels similar to the first quarter. While the data suggests an increased focus on cleaning of certain basins, the majority of hydraulic cleaning is conducted cyclically and is not scheduled by basin. Due to the fact that sewer lines are cleaned prior to TV inspection, a portion of the quarterly variance in the location of cleaning activities can be attributed to efforts to locate I/I sources by TV inspection.

Figure 2.1.1-2: Location of Gravity Line Cleaning



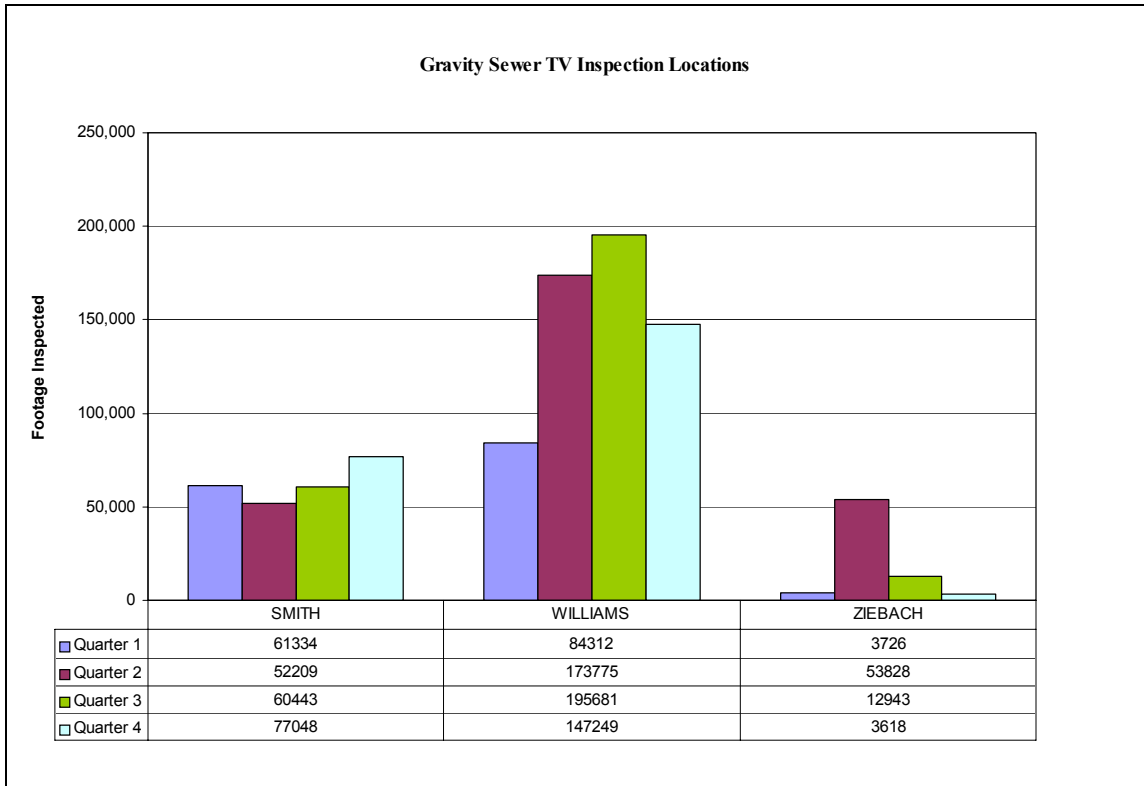
2.1.2 Closed Circuit Television Inspections

In addition to hydraulic cleaning, over 926,100 LF of gravity sewer was inspected by closed circuit TV. TV inspection activities followed the quarterly trends of hydraulic cleaning (see Figure 2.1.1-1). MAWSS TV inspected 14% of the collection systems during 2002. Information gathered from these inspections is used to identify rehabilitation needs for the collection systems.

APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

As with quarterly trends in TV inspection amounts, the trend in location of TV inspection activities follows that of hydraulic cleaning. The second quarter increase in TV inspections for the Ziebach basin was the result of efforts to televise the entire basin so that it can be rehabilitated prior to taking plant out of service.

Figure 2.1.2-1: Location of Gravity Line TV Inspection



2.2 Collection System Rehabilitation

2.2.1 Manhole Rehabilitation

During 2002, 480 manholes were lined. The focus of rehabilitation activities moved from the Williams WWTP basin to the Smith and Ziebach WWTP basins during the third and fourth quarter. Manhole rehabilitation activities for the Ziebach basin increased significantly during the third quarter as a result of defects identified by TV inspections conducted in the second quarter. Manhole rehabilitation in the fourth quarter decreased as annual rehabilitation contracts were completed.

APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

Figure 2.2.1-1: Totals for Manhole Rehabilitation

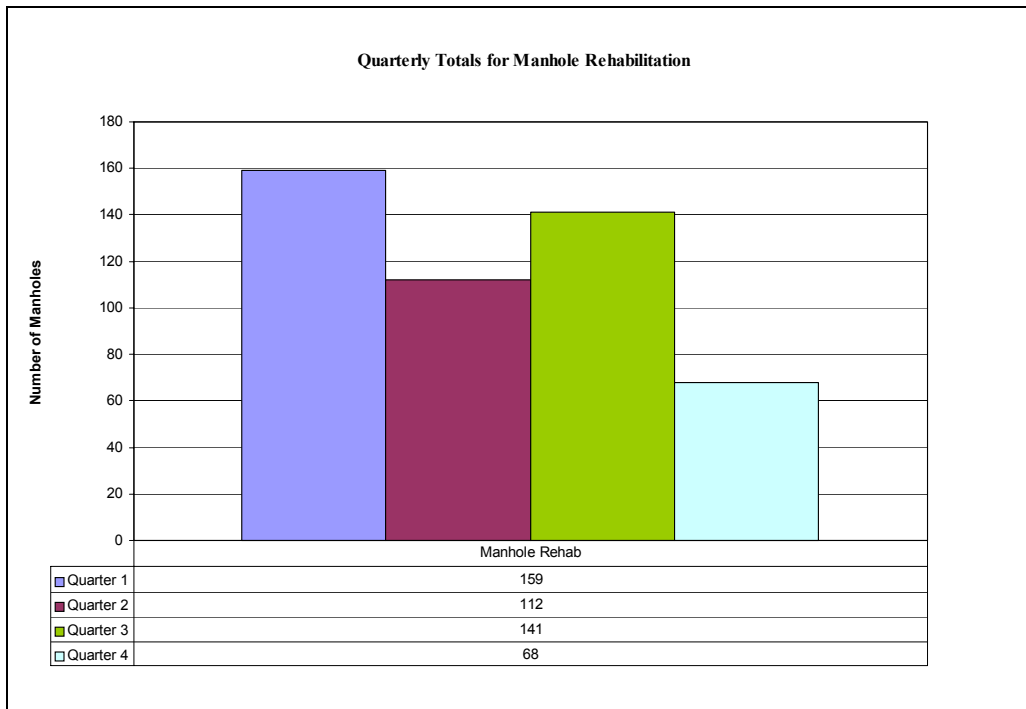
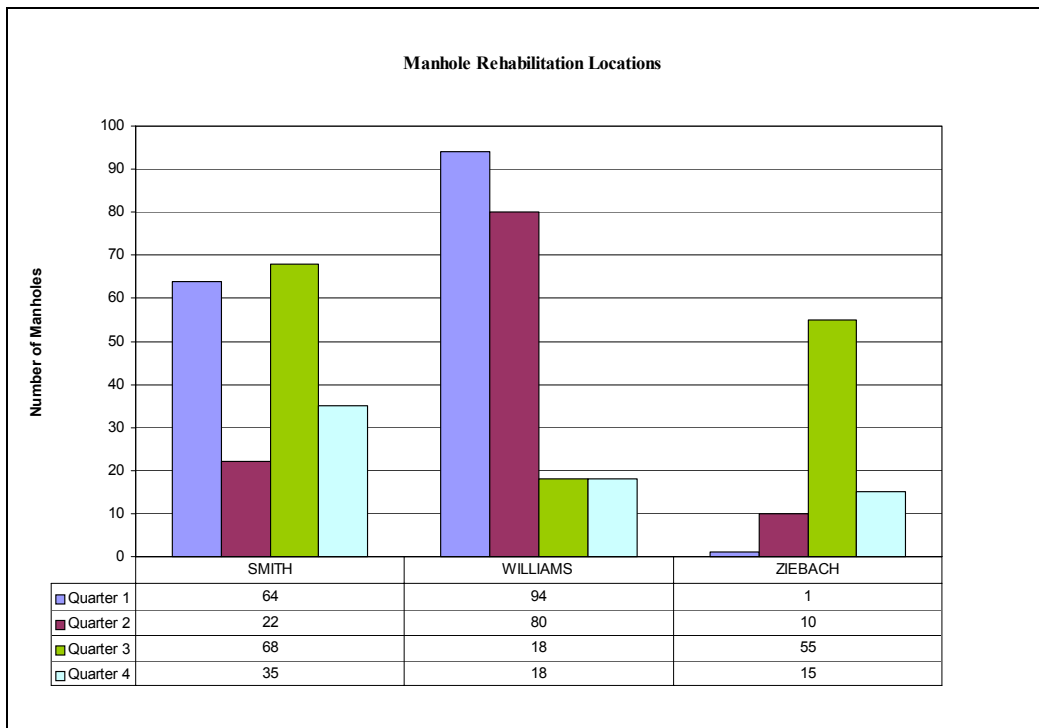


Figure 2.2.1-2: Locations of Manhole Rehabilitation



APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

2.2.2 Gravity Sewer Rehabilitation

Over 86,500 LF of gravity sewer was rehabilitated during 2002. While gravity sewer rehabilitation activities remained steady from the second to the fourth quarter, the work was focused in different basins for each of the quarters.

Figure 2.2.2-1: Totals Gravity Sewer Rehabilitation

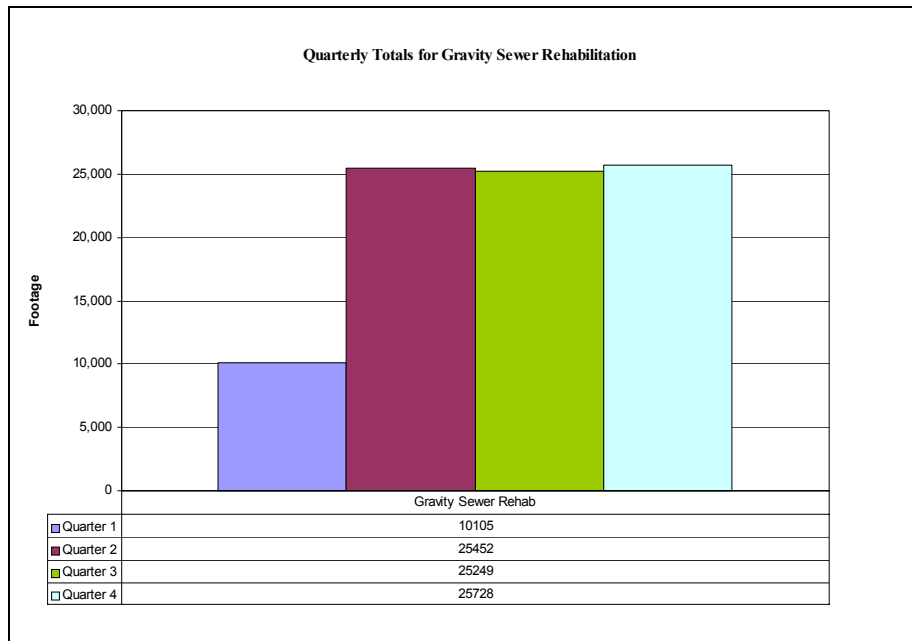
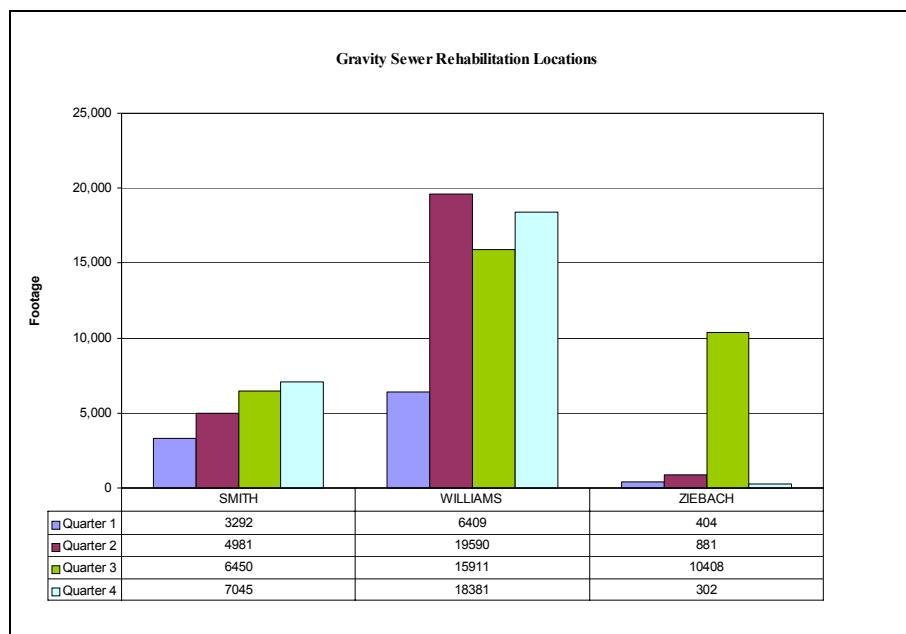


Figure 2.2.2-2: Locations of Gravity Sewer Rehabilitation



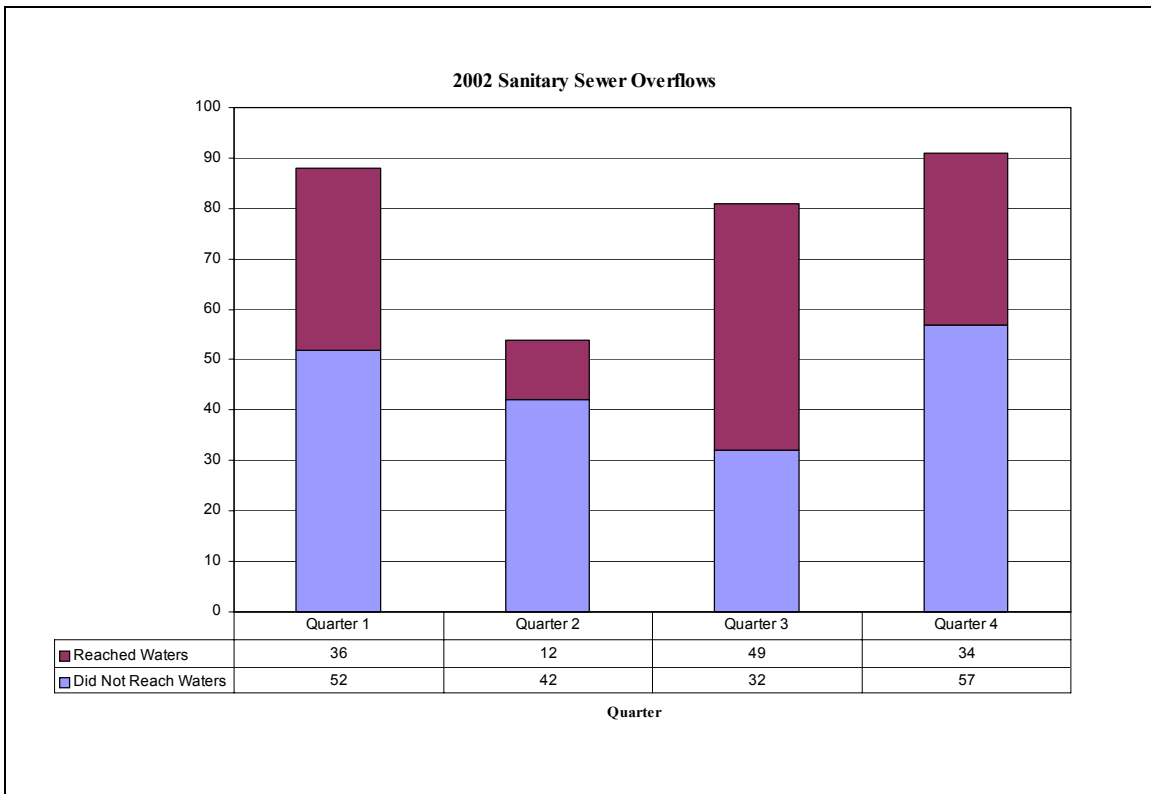
APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

3. Analysis of Unpermitted Discharges and SSOs

3.1 Trend in Number of and Volume of Unpermitted Discharges and SSOs

The number of unpermitted discharges and SSOs decreased from 88 in the first quarter to 54 in the second quarter. A high frequency of severe natural weather events (as defined by Paragraph 23 of the CD) in the third and fourth quarter resulted in an increase of overflows for these quarters. This high frequency of severe natural events also resulted in a significant increase quarterly overflow volumes from an average of 55,700 gallons in the first two quarters to an average of 749,600 gallons in the last two quarters. As a result of the abnormal frequency of these severe events, quarterly overflow totals from 2003 are needed to determine if overflow reductions are being achieved through maintenance and rehabilitation.

Figure 3.1-1: Trend in Number of Unpermitted Discharges and SSOs

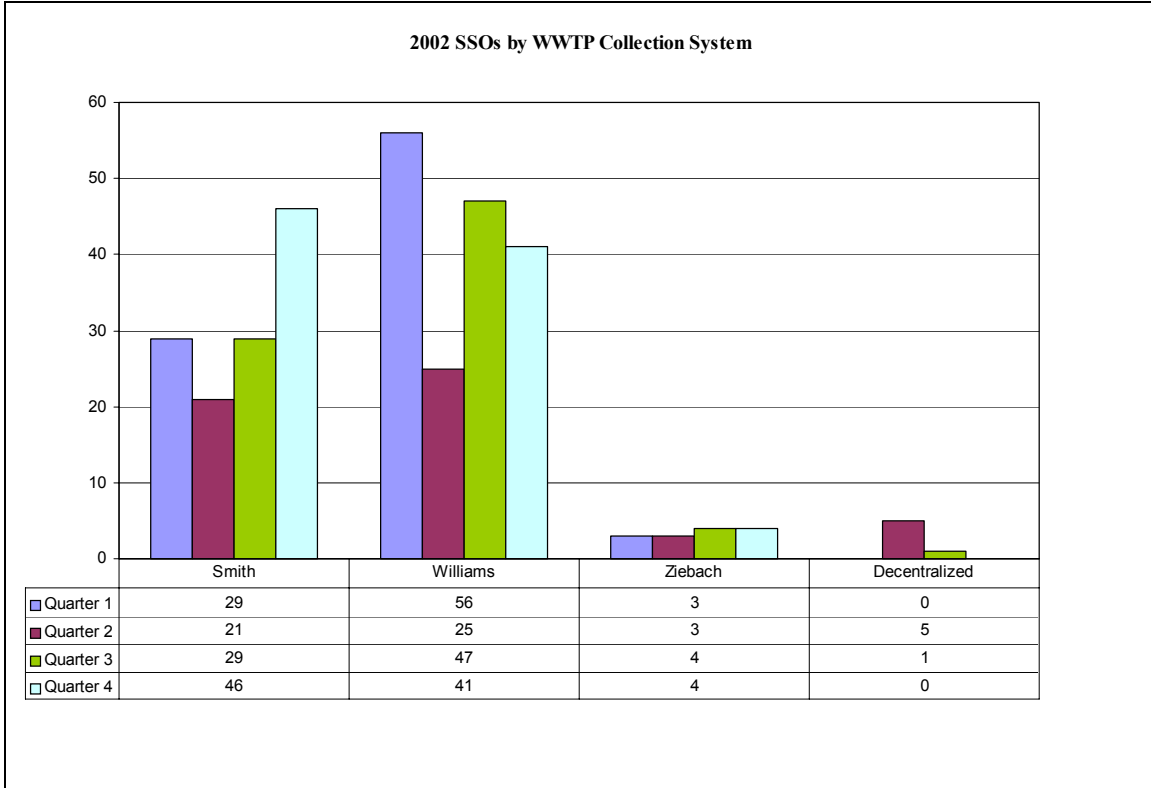


APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

3.2 Trend in the Location of Unpermitted Discharges and Overflows

Most of the increase in third and fourth quarter overflows was experienced in the Smith and Williams basins. It is anticipated that rehabilitation work in these basins will result in 2003 quarterly totals less than those of the second quarter of 2002.

Figure 3-2.1: Trend in Location of Unpermitted Discharges and SSOs

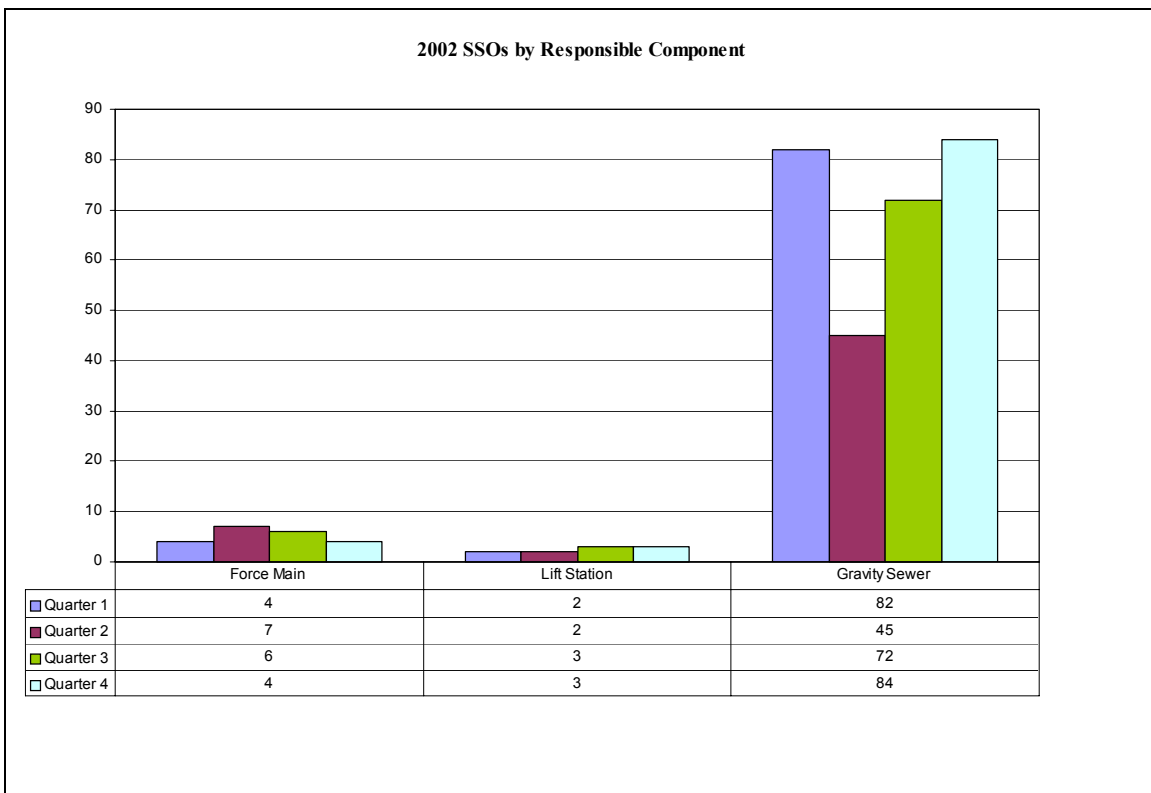


APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

3.3 Trend in the System Component Responsible for Unpermitted Discharges and SSOs

Throughout the year, the highest number of overflows was attributed to gravity sewer problems. The comparison of quarterly overflow totals shows that lift stations experienced a steady and small occurrence of overflows. Likewise, occurrences of force main related overflows remained steady with an average of 5 per quarter. It is believed that future overflow data gathered during periods with normal occurrences of severe weather events will illustrate a reduction in gravity sewer problems due to maintenance and rehabilitation activities.

Figure 3.3-1: Trend in Components Responsible for Unpermitted Discharges and SSOs

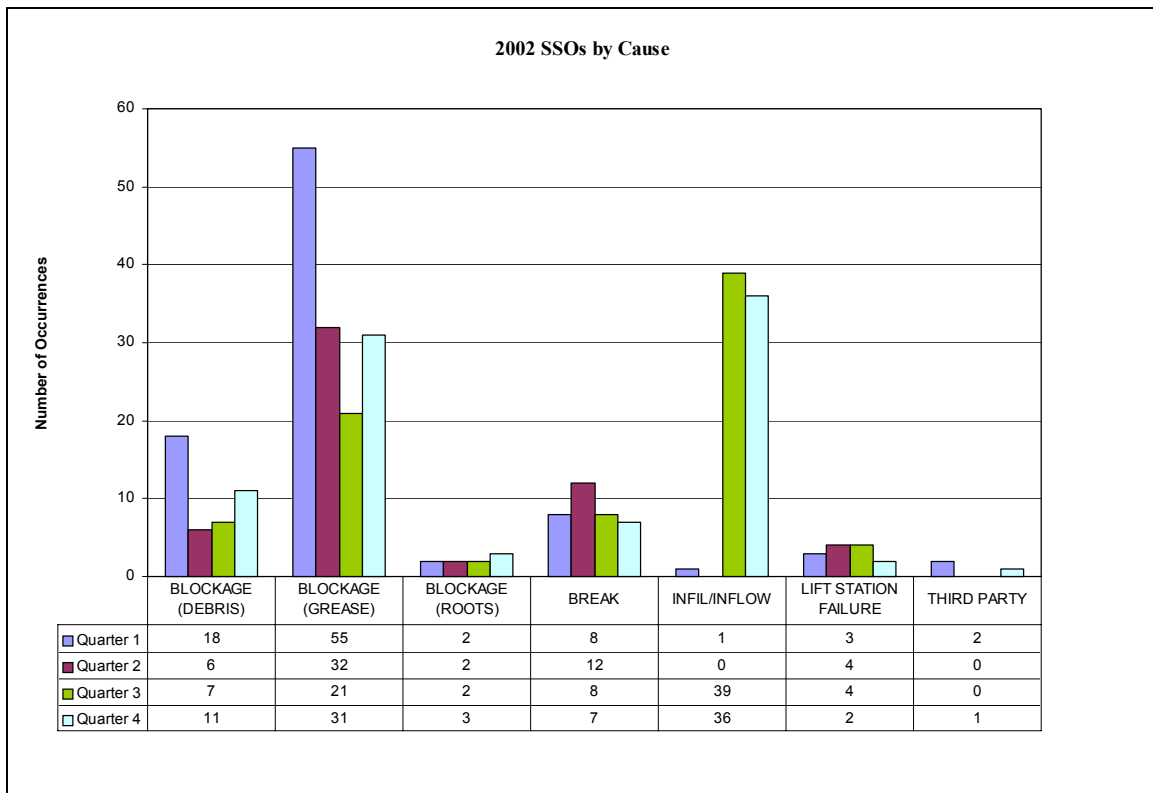


APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

3.4 Trend in the Suspected Cause of Unpermitted Discharges and Overflows

Line blockages, specifically those related to grease, were the most frequent cause of overflows during the first two quarters. Overflows related to root buildup remained steady throughout the year while overflows related to debris and grease dropped significantly from the first quarter to a relatively steady amount during the last three quarters. Occurrences of I/I related overflows increased significantly from only 1 during the first two quarters to 75 during the third and fourth quarters. This significant increase is directly related to the number of severe weather events that occurred.

Figure 3.4-1: Trend in Causes of Unpermitted Discharges and SSOs



4. Conclusions

Excluding overflows related to severe weather events such as Tropical Storm Isadore brings the trend in overflow occurrences for the third and fourth quarter to levels experienced during the second quarter. Again, excluding overflows related to severe weather events, gravity line maintenance and rehabilitation activities continued to keep overflow occurrence levels during the third and fourth quarter in line with levels experienced during the second quarter. Blockages

APPENDIX A-3: ANALYSIS OF WASTEWATER COLLECTION AND TRANSMISSION SYSTEMS AND WWTFs

caused by grease continue to represent the largest maintenance problem. Continued implementation of the Grease Control Program in 2003 should significantly reduce the occurrences of these blockages. Additionally, further completion of lift station improvements and the addition of emergency lift station backup devices should also reduce the number of overflows.

Additional data is needed to determine the full extent of the impacts of rehabilitation and maintenance on overflow reductions. As illustrated by the overflows resulting from severe weather conditions, factors other than increased rehabilitation and maintenance can impact collection system performance.