

**2004 ANNUAL REPORT
OF SANITARY SEWER OVERFLOWS AND
UNPERMITTED DISCHARGES**



January 2005

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.

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

1. Reporting Requirements

In accordance with Paragraph 21 of the Consent Decree (CD), the following report presents information regarding sanitary sewer overflows (SSOs) that occurred in 2004. Table 1 presents information regarding overflows that did not reach waters of the State or United States (CD Paragraph 21.c.ii). Overflows that reached waters of the State or United States (CD Paragraph 21.b.ii) are classified as Unpermitted Discharges and can be found in Table 2.

2. Summary of Unpermitted Discharges

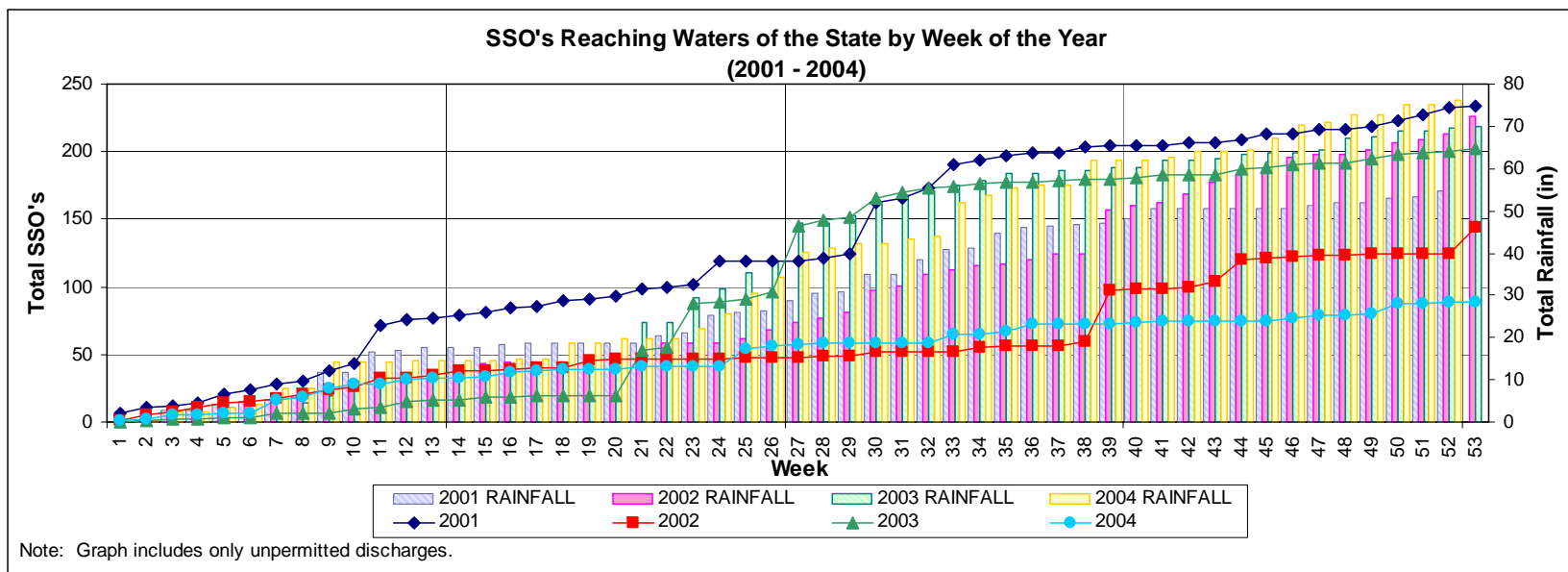
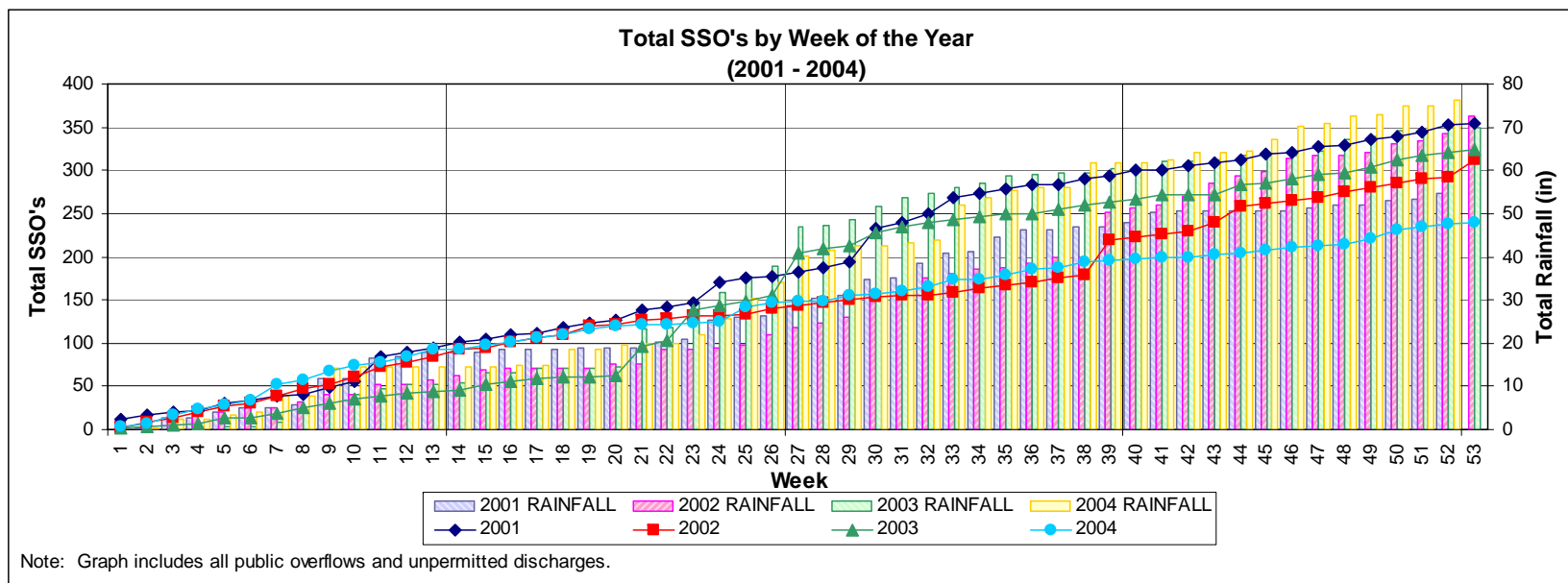
A total of 240 overflows were reported in 2004. Of this amount, 89 (37%) were identified as having reached waters of the State or United States and were classified as Unpermitted Discharges.

There were a total of 333 overflows reported in 2003. In 2004 there were 93 (28%) less total overflows than reported in 2003. For those SSOs classified as Unpermitted Discharges, the reduction was larger. There were 121 fewer (58%) Unpermitted Discharges in 2004 than the 210 reported in 2003. The reduction in Unpermitted Discharges can be attributed to successful efforts to reduce infiltration and inflow caused by storm events and programs aimed at reducing dry weather overflows. Figure 2-1 illustrates the cumulative totals of rainfall along with total overflows and total Unpermitted Discharges by week for each year since 2001.

The annual trends in total overflows typically follow trends in yearly rainfall totals. Infiltration and inflow (I/I) from rain events can be a direct cause of overflows by increasing flow rates beyond the capacity of the collection system. Additionally, increased flow rates due to I/I may be a secondary cause of overflows by compounding the impact of other problems such as blockages and structural failures. Despite the correlations between yearly rainfall and overflow totals, 2004 had significantly fewer overflows while recording the largest yearly rainfall total, 76 inches, in the last five (5) years. The charted data in Figure 2-1 shows that the frequency and magnitude of surges in number of SSOs along the trend line is less in 2004 than in previous years. This indicates that rehabilitation efforts have made the collection system less responsive to rain events.

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

Figure 2-1: Cumulative Overflows by Year



ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

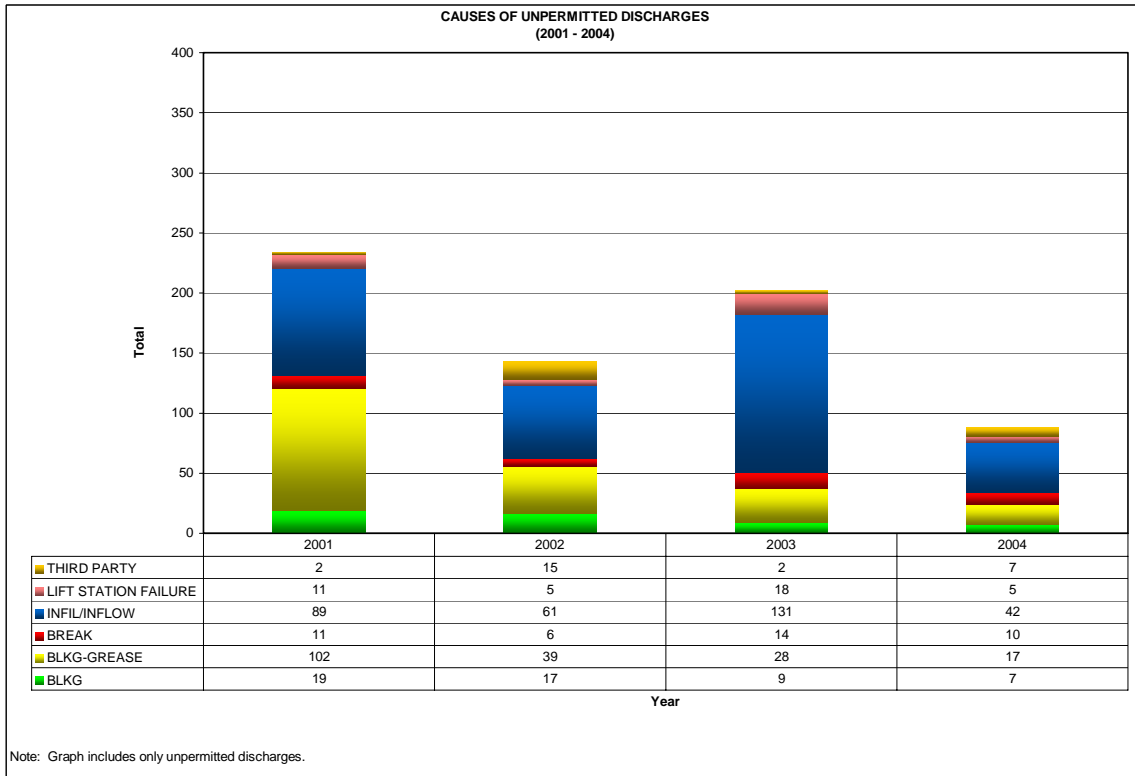
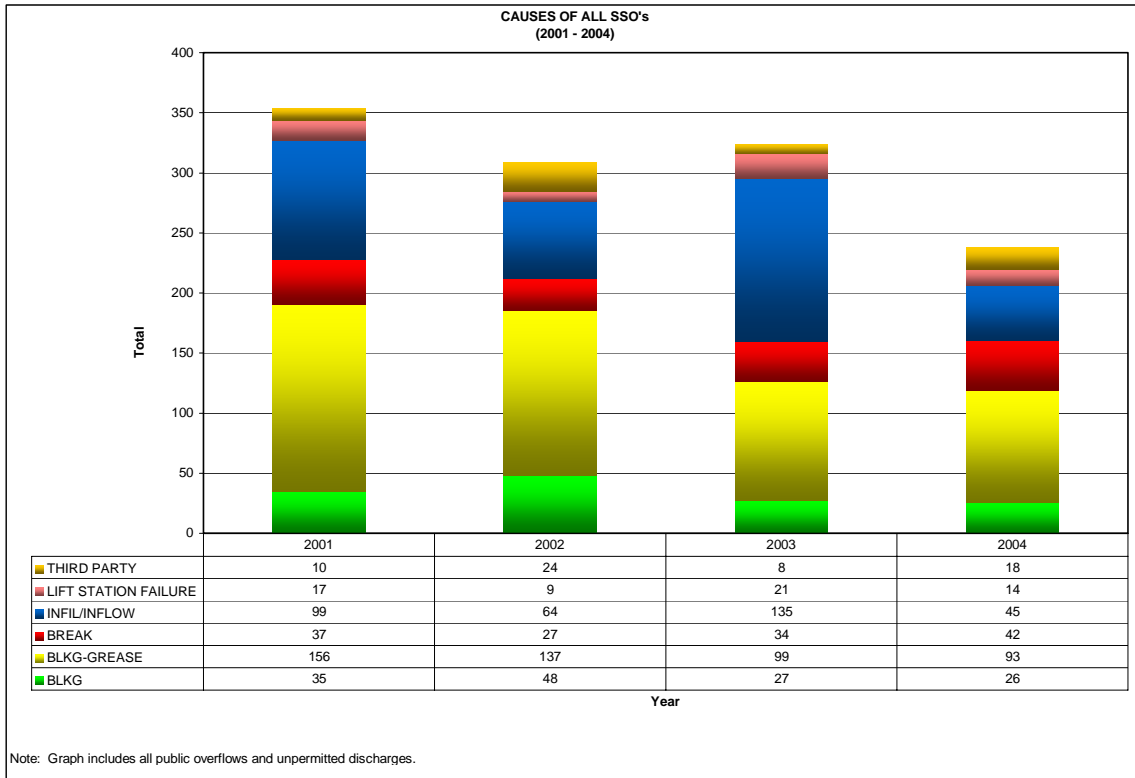
A review of yearly overflow data for 2003 and 2004 indicates that 31 percent fewer dry weather overflows are reaching waters of the State or United States. Dry weather overflows are those overflows caused by blockages and gravity sewer defects. The reduction in dry weather overflows reaching waters can be attributed to lower dry weather overflow volumes and the quick response times of MAWSS crews.

Figure 2-2 on the following page shows the distribution of overflow causes for total overflows and Unpermitted Discharges by year since 2001. Of the 240 overflows that were reported in 2004, 93 (39%) were the result of grease-related blockages. It should be noted that many grease-related are caused by grease in combination with sewer main defects. Video inspections of lines with grease-related blockages are reviewed to identify whether grease is accumulating on defects such as roots, dropped joints, sags, or some other line defect. These defects are addressed in addition to the placement of the sewer line on a frequent cleaning cycle.

While grease continues to significantly impact collection system performance, the reduction in grease related overflows since 2001 reflects the Board's continuing efforts to make improvements to the Grease Control Program and repair gravity line defects.

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

Figure 2-2: Distribution of Overflow Causes by Year



ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

2.1 Hurricane Ivan

The largest storm event of 2004 was Hurricane Ivan on September 15. The eye of the hurricane was within 10 miles of the MAWSS service area. The extreme wind and rainfall, 10.03 inches within 24 hours, contributed large volumes of I/I while causing power outages across the service area. Nine (9) overflows were reported as a result of this event.

The relatively low number of overflows caused by a storm of this magnitude can be primarily attributed to the implementation of the MAWSS Preparedness Plan. As part of the plan, eight portable bypass pumps, eight portable generators, and seven vacuum trucks were available for emergency operations. Of the nine overflows, only two reached waters of the State or United States.

The largest SSO was the bypass of 1,100,000 gallons to Mobile Bay from the Ziebach WWTP. Due to personnel safety concerns, a decision was made to abandon the Ziebach WWTP for 15 hours during the hurricane due to a forecasted storm surge. The plant is located in a low lying area on the bank of Mobile Bay. The portable generator at the plant was removed to prevent the generator from being damaged by flooding. If the power was lost to the plant, flows entering the plant would not be controlled and could potentially result in long term damage to the plant. Consequently, the plant was bypassed.

It should be noted that this plant was scheduled to be taken out of service prior to Hurricane Ivan. This plan was delayed because condemnation was required to obtain easements for the new Perch Creek Lift Station force main.

3. Summary of Programs

Over the past year, the Board has made significant improvements in its operations and maintenance programs.

Cleaning and television inspection efforts were targeted in areas where no prior cleaning or television inspection had been conducted. Additionally, the Board contracted the expensive cleaning of several large diameter trunk sewers, significantly improving their capacity. Over 1200 point repairs were made along gravity sewers and public portions of service laterals and over 17,000 feet of pipe was rehabilitated using cured-in-place-pipe (CIPP). The Board has recently purchased two (2) additional combination cleaning trucks for 2005. Along with the new

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

trucks, the Board is adding staff and conducting training to substantially increase cleaning and video production. The Board's resources for cleaning sewers will be a fleet of 10 combination cleaning trucks and one jet truck. Additionally, specifications are being developed to add two (2) new video units and replace two (2) old units. The two (2) old units will be used as standby units in the event a unit goes out of service.

The Grease Control Program which began in October 2002 has had a significant impact on the reduction in grease related overflows. However, since grease related overflows continue to remain a leading cause of overflows, the Board is continuously evaluating the program for improvements. In addition to the extensive monitoring and compliance efforts, the Board is also exploring new ways to educate the public on the adverse effects of grease on collection system performance. In March of 2004, MAWSS personnel began distributing a revised Grease Control Program Manual to Food Service Facilities (FSFs). Additionally, MAWSS forces began placing door hangers with grease control information in areas where video inspection of the sewer system indicates further grease control education is needed. Other proposed educational programs being explored include a presentation to elementary school students explaining the problems associated with grease and the correct methods of grease disposal. The Board recently hired a public affairs manager to develop programs that will educate the public about water and sewer issues.

The Board has also implemented new procedures to address secondary causes of grease related overflows. All sewer lines associated with overflows are inspected with closed circuit television cameras (CCTV) and placed on a frequent cleaning schedule. Video information from grease related overflows is reviewed to determine if other defects are allowing grease to accumulate. Defects such as roots and dropped joints that can be corrected through point repairs or cured-in-place-pipe (CIPP) are scheduled for repair. Sewer lines on less than minimum grade or containing sags that accumulate grease remain on a frequent cleaning schedule until the lines can be re-laid at a proper grade, if possible. Sewer lines with roots are cleared and lined.

Prior to last year, gravity sewer main lines and manholes were the focus of repair efforts. The Board has is now giving much attention to the public portions of service laterals. During the past year seven hundred and seventy-seven (777) of the public laterals were replaced or repaired. A review of data from flow monitors indicates that these repairs are further reducing I/I.

Operations and maintenance of lift stations also received significant improvements over the past year. A combination cleaning truck has been permanently assigned to the cleaning of lift station

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

wet wells. Backup systems such as diesel pumps and backup generators were installed at several lift stations. Other stations received major upgrades. The Virginia Street Lift Station Upgrade Project and the Florida Street Lift Station Relocation Project were completed at the end of 2003. Construction of upgrades to the Halls Mill Lift Station was completed during the third quarter of 2004. Completion of the Eslava Creek Lift Station upgrades is expected no later than the end of May 2005. Work to reroute the Faye Lane Lift Station is substantially complete and will remove up to 4 MGD from the Eslava Creek Lift Station during heavy rain events.

All of these efforts have reduced overflows. Yearly totals of reported overflows have been trending downward for the last four years. The number of overflows reported in 2004 was the lowest ever in spite of the occurrence of Hurricane Ivan and the fact that the total rainfall for 2004 exceeded the annual rainfall totals of the previous five (5) years.

The Board has authorized borrowing \$25 million a year for the next 4 years through the State Revolving Fund (SRF) to be used for system improvements. These funds will be borrowed as needed.

A recent 10% increase in the water and wastewater rate took place January 1, 2005. The increase is expected to support repayment of SRF loans.

Although the Board is experiencing significant reductions in SSOs, it is not known if SSOs will be reduced to a satisfactory level by the termination date of the Consent Decree, September 30, 2007. Consequently, the Board is evaluating the possibility of requesting an extension of the Consent Decree deadline after evaluating SSO reductions in 2005.

4. Severe Natural Events

Paragraph 23 of the Consent Decree defines “severe natural events” with regard to Contingency Planning. On July 31, 2002, MAWSS provided Contingency Plans for its wastewater plants as well as its collection and transmission systems. These plans documented procedures to avoid or delay component failures resulting from severe natural events.

Sixteen (16) severe natural events occurred during 2004. Further information regarding each of the severe natural events is provided below.

Severe Natural Event (January 26, 2004)

During this event, the largest volume of rainfall recorded was 2.0 inches. Rainfall intensities of 1.27 inches in 1 hour and 0.39 inches over 15 minutes exceeded the criteria for severe natural

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

events described in CD Paragraph 23a. One overflow totaling 400 gallons was attributed to this storm event.

Severe Natural Event (April 30, 2004)

During this event, the largest volume of rainfall recorded was 3.12 inches. Rainfall intensities of 1.84 inches in 1 hour and 0.67 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. No overflows occurred during this storm event.

Severe Natural Event (May 13, 2004)

During this event, the largest volume of rainfall recorded was 2.17 inches. Rainfall intensity of 0.49 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. One overflow totaling 20 gallons was reported during this storm event.

Severe Natural Event (June 1, 2004)

During this event, the largest volume of rainfall recorded was 2.69 inches. Rainfall intensities of 1.07 inches in 1 hour and 0.63 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. No overflows were reported during this storm event.

Severe Natural Event (June 14, 2004)

During this event, the largest volume of rainfall recorded was 3.49 inches. Rainfall intensities of 2.10 inches in 1 hour and 0.84 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Five (5) overflows totaling 5,800 gallons were attributed to this storm event.

Severe Natural Event (June 15, 2004)

During this event, the largest volume of rainfall recorded was 3.54 inches. Rainfall intensities of 1.16 inches in 1 hour and 0.7 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Elevated flows resulting from the previous day's severe natural event resulted in 10 overflows totaling 38,125 gallons.

Severe Natural Event (June 18, 2004)

During this event, the largest volume of rainfall recorded was 3.24 inches. Rainfall intensities of 2.99 inches in 1 hour and 1.25 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. No overflows were reported during this rain event.

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

Severe Natural Event (August 10, 2004)

During this event, the largest volume of rainfall recorded was 2.73 inches. Rainfall intensities of 1.70 inches in one hour and 1.04 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. One overflow totaling 150 gallons was reported during this storm event.

Severe Natural Event (August 11, 2004)

During this event, the largest volume of rainfall recorded was 5.04 inches. Rainfall intensities of 2.76 inches in one hour and 1.05 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. One overflow totaling 500 gallons was reported during this storm event.

Severe Natural Event (August 12, 2004)

During this event, the largest volume of rainfall recorded was 7.40 inches. Rainfall intensities of 1.75 inches in one hour and 0.88 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Elevated flows from the previous two days' events contributed to five overflows totaling 31,450 gallons.

Severe Natural Event (August 30, 2004)

During this event, the largest volume of rainfall recorded was 2.63 inches. Rainfall intensities of 2.57 inches in one hour and 1.16 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Four (4) overflows totaling 9,525 gallons were attributed to this storm event.

Severe Natural Event (August 31, 2004)

During this event, the largest volume of rainfall recorded was 1.40 inches. Rainfall intensities of 1.40 inches in one hour and 0.75 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Despite the heavy rainfall, no overflows were attributed to this event.

Hurricane Ivan (September 15, 2004)

During the hurricane, the largest volume of rainfall recorded was 10.03 inches. Rainfall intensities of 1.79 inches in one hour and 0.70 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. The largest overflow caused by the hurricane, the bypass of 1,100,000 gallons, was the result of evacuation of the Ziebach WWTP. The remaining eight overflows caused by the hurricane totaled 6,075 gallons.

ANNUAL REPORT OF SANITARY SEWER OVERFLOWS AND UNPERMITTED DISCHARGES

Severe Natural Event (November 11, 2004)

During this event, the largest volume of rainfall recorded was 3.65 inches. Rainfall intensities of 1.30 inches in one hour and 0.63 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Two (2) overflows totaling 2,250 gallons were attributed to this storm event.

Severe Natural Event (December 5, 2004)

During this event, the largest volume of rainfall recorded was 2.17 inches. Rainfall intensities of 1.32 inches in one hour and 0.50 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. Seven (7) overflows totaling 12,565 gallons were attributed to this storm event.

Severe Natural Event (December 22, 2004)

During this event, the largest volume of rainfall recorded was 2.30 inches. Rainfall intensities of 1.34 inches in one hour and 0.68 inches over 15 minutes exceeded the criteria for severe natural events described in CD Paragraph 23a. One overflow totaling 1,050 gallons was attributed to this storm event.

Table 1: 2004 Sanitary Sewer Overflows Not Reaching Waters of the State or United States
(As required by Consent Decree Paragraph 21.c.ii)

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

OCURRENCE ID	COLLECTION SYSTEM	DISCHARGE DATE	SEVERE NATURAL EVENT	THIRD PARTY	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	REASON FOR NOT REACHING WATER COURSE	CORRECTIVE ACTION	NATURE OF IMPACT ON HEALTH AND ENVIRONMENT
002	WILLIAMS	1/1/2004			BLOCKAGE (ROOTS)	0.25	200	MANHOLE	PONDED-VACUUMED SPILL	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
004	WILLIAMS	1/2/2004			BLOCKAGE (GREASE)	1.5	1350	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
005	SMITH	1/3/2004			BLOCKAGE (GREASE)	1	160	MANHOLE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
007	SMITH	1/6/2004			BLOCKAGE (ROOTS)	0.75	106	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
008	WILLIAMS	1/6/2004			BLOCKAGE (DEBRIS)	0.5	40	MANHOLE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
009	WILLIAMS	1/12/2004			BLOCKAGE (GREASE)	2	120	CLEANOUT	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
010	WILLIAMS	1/12/2004			BLOCKAGE (GREASE)	1.5	90	MANHOLE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
011	WILLIAMS	1/13/2004			BLOCKAGE (GREASE)	1	60	CLEANOUT	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
012	WILLIAMS	1/12/2004			BREAK	2.75	59	FORCE MAIN	ABSORBED IN GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
013	SMITH	1/14/2004			BLOCKAGE (GREASE)	0.5	40	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
014	WILLIAMS	1/15/2004			BLOCKAGE (ROOTS)	1	40	LATERAL	CONTAINED UNDER HOUSE	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
015	WILLIAMS	1/16/2004			BLOCKAGE (GREASE)	0.25	30	LATERAL	CONTAINED NEXT TO HOUSE	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
020	SMITH	1/19/2004			BREAK	0.5	30	LATERAL	ABSORBED IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
021	WILLIAMS	1/19/2004			BLOCKAGE (DEBRIS)	3	20	LATERAL	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
022	WILLIAMS	1/19/2004			BLOCKAGE (DEBRIS)	3.5	210	LATERAL	PONDED-VACUUMED SPILL	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
025	SMITH	1/18/2004			BLOCKAGE (DEBRIS)	1	50	LATERAL	CONTAINED IN YARD	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
027	WILLIAMS	1/20/2004			BLOCKAGE (ROOTS)	0.25	15	MANHOLE	PONDED/ABSORBED/& VACUUMED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
028	SMITH	1/20/2004			BLOCKAGE (GREASE)	2	600	MANHOLE	WATER EVAPORATED IN STREET	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
029	WILLIAMS	1/26/2004	1.27 INCHES/1 HOUR		INFIL/INFLOW	1.25	400	MANHOLE	PONDED	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
031	WILLIAMS	1/27/2004			BLOCKAGE (GREASE)	1	275	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE AND VIDEO IN 6 MONTHS TO EVALUATE	NO IMPACT IDENTIFIED
032	POLO PLACE	1/28/2004			BREAK	2	60	FORCE MAIN	PONDED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
034	WILLIAMS	1/28/2004			BLOCKAGE (GREASE)	1.5	475	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
035	WILLIAMS	2/2/2004			BLOCKAGE (GREASE)	1	60	MANHOLE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
036	SMITH	2/2/2004			BLOCKAGE (GREASE)	0.5	75	MANHOLE	PONDED/ABSORBED IN GROUND	PLACE M/H 001B ON CYCLE 2	NO IMPACT IDENTIFIED
037	SMITH	2/3/2004			BLOCKAGE (GREASE)	1.25	350	MANHOLE	ABSORBED IN GROUND	REPLACE 2 SERVICES/MAIN LINE POINT REPAIR	NO IMPACT IDENTIFIED
038	WILLIAMS	2/4/2004			BLOCKAGE (GREASE)	2.75	160	MANHOLE	PONDED INTO WOODS	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
039	POLO PLACE	2/5/2004			BREAK	0.25	30	FORCE MAIN	PONDED INTO GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
043	WILLIAMS	2/11/2004			BREAK	0.25	25	LATERAL	PONDED/ABSORBED IN GROUND	SERVICE POINT REPAIR	NO IMPACT IDENTIFIED
053	WILLIAMS	2/12/2004			INFIL/INFLOW	0.5	175	MANHOLE	PONDED IN AREA BY MANHOLE	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
054	SMITH	2/12/2004			BLOCKAGE (GREASE)	1	29	LATERAL	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
055	SMITH	2/12/2004			INFIL/INFLOW	6	360	MANHOLE	PONDED/ABSORBED IN GROUND	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
056	WILLIAMS	2/13/2004			BLOCKAGE (GREASE)	1	60	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
057	WILLIAMS	2/13/2004			BLOCKAGE (GREASE)	1.25	170	MANHOLE	PONDED/ABSORBED IN GROUND	PLACE ON CLEAN CYCLE 2	NO IMPACT IDENTIFIED
058	WILLIAMS	2/13/2004			BLOCKAGE (GREASE)	1	70	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
059	WILLIAMS	2/13/2004			BREAK	1.5	65	LATERAL	CONTAINED IN DRIVEWAY	LATERAL POINT REPAIR	NO IMPACT IDENTIFIED
060	WILLIAMS	2/14/2004			BLOCKAGE (DEBRIS)	1	15	MAIN LINE	ABSORBED IN GROUND	SERVICE POINT REPAIR	NO IMPACT IDENTIFIED
063	WILLIAMS	2/16/2004			BLOCKAGE (GREASE)	0.75	200	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
064	SMITH	2/18/2004			BLOCKAGE (GREASE)	1	60	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
066	WILLIAMS	2/23/2004			BLOCKAGE (ROOTS)	0.25	15	SHOWER/TOILET	CONTAINED INSIDE HOUSE	POINT REPAIR/LINE MAIN	OVERFLOWED IN HOUSE
068	SMITH	2/20/2004			BLOCKAGE (GREASE)	0.5	70	MANHOLE	PONDED IN YARD	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
074	WILLIAMS	2/25/2004			BLOCKAGE (GREASE)	0.5	450	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
076	WILLIAMS	2/26/2004			BLOCKAGE (GREASE)	1.5	450	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
078	SMITH	3/2/2004			BREAK	2.5	500	FORCE MAIN	PONDED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
079	ZIEBACH	3/3/2004		THIRD PARTY	BREAK	2	240	FORCE MAIN	VACUUMED SPILL	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
082	ZIEBACH	3/5/2004			BLOCKAGE (GREASE)	1.25	140	MANHOLE	PONDED/ABSORBED IN GROUND	PLACE ON CLEANING CYCLE	NO IMPACT IDENTIFIED
083	SMITH	3/5/2004			LIFT STATION FAILURE	0.25	150	MANHOLE	PONDED/ABSORBED IN GROUND	INSTALL A PRESSURE TRANSDUCER	NO IMPACT IDENTIFIED
084	WILLIAMS	3/6/2004			BLOCKAGE (GREASE)	2.5	300	MANHOLE	PONDED IN YARD	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
086	SMITH	3/10/2004		THIRD PARTY	BREAK	2	100	FORCE MAIN	PONDED, ABSORBED, AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
087	WILLIAMS	3/11/2004			BREAK	0.75	50	PUBLIC SERVICE	VACUUMED SPILL	POINT REPAIR	NO IMPACT IDENTIFIED

Table 1: 2004 Sanitary Sewer Overflows Not Reaching Waters of the State or United States
(As required by Consent Decree Paragraph 21.c.ii)

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

OCURRENCE ID	COLLECTION SYSTEM	DISCHARGE DATE	SEVERE NATURAL EVENT	THIRD PARTY	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	REASON FOR NOT REACHING WATER COURSE	CORRECTIVE ACTION	NATURE OF IMPACT ON HEALTH AND ENVIRONMENT
088	SMITH	3/13/2004		THIRD PARTY	BREAK	5	100	FORCE MAIN	ABSORBED IN GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
094	SMITH	3/19/2004			BREAK	1	45	PUBLIC SERVICE	PONDED	POINT REPAIR	NO IMPACT IDENTIFIED
095	WILLIAMS	3/20/2004			BLOCKAGE (DEBRIS)	1	350	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
096	WILLIAMS	3/20/2004			BLOCKAGE (DEBRIS)	0.5	15	LAMPHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
097	SMITH	3/19/2004			BREAK	3	15	FORCE MAIN	ABSORBED IN GROUND AND VACUUMED	POINT REPAIR	NO IMPACT IDENTIFIED
098	WILLIAMS	3/22/2004			BREAK	3.25	585	MAIN LINE	PONDED/ABSORBED IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
099	WILLIAMS	3/22/2004			BLOCKAGE (DEBRIS)	2	15	PUBLIC SERVICE	VACUUMED SPILL	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
102	WILLIAMS	3/25/2004			BLOCKAGE (GREASE)	1	300	MANHOLE	PONDED, ABSORBED, AND VACUUMED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
104	HUTCHENS ELEM	3/25/2004			BREAK	0.25	25	FORCE MAIN	PONDED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
105	HUTCHENS ELEM	3/25/2004			BREAK	3.75	15	FORCE MAIN	ABSORBED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
106	WILLIAMS	3/30/2004			BREAK	0.25	25	MAIN LINE	SPILL CONTAINED AND VACUUMED	POINT REPAIR	NO IMPACT IDENTIFIED
108	SMITH	4/5/2004			BREAK	4.5	150	FORCE MAIN	VACUUMED SPILL	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
109	WILLIAMS	4/7/2004			BREAK	1	25	FORCE MAIN	ABSORBED IN GROUND AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
110	WILLIAMS	4/8/2004			BREAK	1.5	59	PUBLIC SERVICE	RETURNED TO LATERAL	POINT REPAIR	NO IMPACT IDENTIFIED
111	WILLIAMS	4/10/2004			BLOCKAGE (DEBRIS)	1	300	MANHOLE	VACUUMED SPILL	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
114	WILLIAMS	4/14/2004			BLOCKAGE (GREASE)	0.5	105	MAIN LINE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
116	SMITH	4/18/2004			BREAK	5	300	FORCE MAIN	ABSORBED AND VACUUMED	REPAIR FORCEMAIN	NO IMPACT IDENTIFIED
117	WILLIAMS	4/19/2004			BLOCKAGE (GREASE)	0.5	30	MANHOLE	PONDED/ABSORBED IN GROUND	PLACE ON CLEANING CYCLE 1	NO IMPACT IDENTIFIED
118	WILLIAMS	4/20/2004		THIRD PARTY	BREAK	3	15	FORCE MAIN	VACUUMED SPILL	POINT REPAIR	NO IMPACT IDENTIFIED
120	WILLIAMS	4/26/2004			BLOCKAGE (GREASE)	3.5	15	PUBLIC SERVICE	VACUUMED SPILL	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
122	WILLIAMS	4/29/2004			BLOCKAGE (GREASE)	3.75	200	MAIN LINE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
123	WILLIAMS	5/3/2004			BLOCKAGE (GREASE)	0.5	5	PUBLIC SERVICE	PONDED AND VACUUMED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
125	WILLIAMS	5/4/2004			BREAK	1	65	FORCE MAIN	PONDED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
126	SMITH	5/4/2004			BLOCKAGE (GREASE)	1.75	525	MAIN LINE	CONTAINED IN DITCH	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
127	SMITH	5/5/2004			BLOCKAGE (GREASE)	0.25	270	PRIVATE SERVICE	PONDED	POINT REPAIR	NO IMPACT IDENTIFIED
128	WILLIAMS	5/5/2004			BLOCKAGE (GREASE)	1.75	40	MAIN LINE	PONDED AND VACUUMED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
129	WILLIAMS	5/9/2004			BLOCKAGE (GREASE)	2.5	120	MANHOLE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
130	SMITH	5/7/2004			BLOCKAGE (GREASE)	4	240	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
131	SMITH	5/6/2004			BLOCKAGE (GREASE)	1	60	MANHOLE	PONDED/ABSORBED IN GROUND	POINT REPAIR OUTSIDE M/H 048	NO IMPACT IDENTIFIED
132	SMITH	5/11/2004			BLOCKAGE (GREASE)	2.5	40	PUBLIC SERVICE	PONDED AND VACUUMED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
133	SMITH	5/13/2004	0.49 INCHES/ 15 MINUTES		BLOCKAGE (GREASE)	2	20	PRIVATE SERVICE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
136	WILLIAMS	5/24/2004			BLOCKAGE (GREASE)	0.75	230	PRIVATE SERVICE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
137	WILLIAMS	6/4/2004			BREAK	0.25	15	FORCE MAIN	VACUUMED SPILL	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
138	WILLIAMS	6/8/2004			BLOCKAGE (GREASE)	1.75	100	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
139	WILLIAMS	6/6/2004			BLOCKAGE (GREASE)	1.75	50	PRIVATE SERVICE	CONTAINED INSIDE HOUSE	POINT REPAIR	NO IMPACT IDENTIFIED
142	WILLIAMS	6/14/2004	2.10 INCHES/ 1 HOUR	THIRD PARTY	BREAK	1.75	500	MANHOLE	PONDED AT MANHOLE	UPGRADE BYPASS	NO IMPACT IDENTIFIED
144	WILLIAMS	6/14/2004	2.10 INCHES/ 1 HOUR		BLOCKAGE (GREASE)	0.5	150	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
155	SMITH	6/17/2004			BLOCKAGE (GREASE)	0.25	10	COMMODE	CONTAINED IN HOUSE	PLACED ON CLEANING CYCLE	OVERFLOWED IN HOUSE
158	COPELAND ISLAND	6/20/2004			BREAK	2.5	1	FORCE MAIN	ABSORBED INTO GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
159	WILLIAMS	6/20/2004			BLOCKAGE (GREASE)	0.25	30	PUBLIC SERVICE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
161	WILLIAMS	6/22/2004		THIRD PARTY		0.25	15	MANHOLE	PONDED	LINING COMPLETED - LINE UNPLUGGED	NO IMPACT IDENTIFIED
162	WILLIAMS	6/25/2004			BLOCKAGE (GREASE)	0.75	35	LAMPHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
166	WILLIAMS	7/11/2004			BLOCKAGE (GREASE)	1.5	30	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
167	SMITH	7/12/2004		THIRD PARTY	BREAK	7	21000	FORCE MAIN	SPILL CONTAINED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
168	WILLIAMS	7/12/2004		THIRD PARTY	LIFT STATION FAILURE	0.75	50	LIFT STATION	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
169	SMITH	7/13/2004			BLOCKAGE (GREASE)	0.75	2	MANHOLE	ABSORBED IN GROUND	LATERAL POINT REPAIR	NO IMPACT IDENTIFIED
170	SMITH	7/12/2004			BLOCKAGE (GREASE)	3	10	MANHOLE	PONDED IN DITCH	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
171	SMITH	7/13/2004			BLOCKAGE (GREASE)	1.75	2	MANHOLE	PONDED AT MANHOLE	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
172	SMITH	7/14/2004			BLOCKAGE (GREASE)	0.75	90	MANHOLE	ABSORBED IN GROUND	LATERAL POINT REPAIR	NO IMPACT IDENTIFIED
173	WILLIAMS	7/19/2004			BLOCKAGE (DEBRIS)	0.25	150	PUBLIC SERVICE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
174	SMITH	7/28/2004			BREAK	3	360	PUBLIC SERVICE	ABSORBED IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED

Table 1: 2004 Sanitary Sewer Overflows Not Reaching Waters of the State or United States
(As required by Consent Decree Paragraph 21.c.ii)

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

OCURRENCE ID	COLLECTION SYSTEM	DISCHARGE DATE	SEVERE NATURAL EVENT	THIRD PARTY	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	REASON FOR NOT REACHING WATER COURSE	CORRECTIVE ACTION	NATURE OF IMPACT ON HEALTH AND ENVIRONMENT
175	WILLIAMS	7/29/2004			BLOCKAGE (GREASE)	3.25	190	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
176	HUTCHENS #2	7/31/2004			BREAK	0.5	35	FORCE MAIN	PONDED IN YARD	POINT REPAIR	NO IMPACT IDENTIFIED
178	SMITH	8/3/2004			BLOCKAGE (ROOTS)	0.75	225	MAIN LINE	PONDED IN DITCH	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
179	WILLIAMS	8/5/2004			BREAK	0.5	90	FORCE MAIN	PONDED AND VACUUMED	POINT REPAIR	NO IMPACT IDENTIFIED
180	WILLIAMS	8/5/2004			LIFT STATION FAILURE	1.5	90	FORCE MAIN	ABSORBED IN GROUND	CLOSE AIR RELEASE VALVE	NO IMPACT IDENTIFIED
181	WILLIAMS	8/5/2004			BREAK	0.25	50	PUBLIC SERVICE	ABSORBED IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
182	SMITH	8/6/2004			BLOCKAGE (GREASE)	1	500	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
183	WILLIAMS	8/5/2004			BREAK	1	300	FORCE MAIN	PONDED AND VACUUMED	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
187	WILLIAMS	8/11/2004			BREAK	2	30	FORCE MAIN	ABSORBED IN GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
195	WILLIAMS	8/23/2004			BLOCKAGE (GREASE)	0.75	150	MANHOLE	PONDED/ABSORBED IN GROUND	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
197	WILLIAMS	8/26/2004			BLOCKAGE (GREASE)	1.25	50	PRIVATE SERVICE	PONDED AROUND CLEANOUT	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
198	WILLIAMS	8/26/2004			BLOCKAGE (GREASE)	0.25	60	MANHOLE	PONDED	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
203	WILLIAMS	8/30/2004			BLOCKAGE (GREASE)	1	300	MAIN LINE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
204	WILLIAMS	9/5/2004		THIRD PARTY	BREAK	3	75	FORCE MAIN	ABSORBED INTO GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
206	SMITH	9/7/2004			BREAK	6	699	FORCE MAIN	ABSORBED INTO GROUND	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
207	WILLIAMS	9/12/2004		THIRD PARTY	BREAK	0.25	25	FORCE MAIN	PONDED/ABSORBED IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
209	SMITH	9/17/2004	1.79 INCHES/ 1 HOUR		LIFT STATION FAILURE	1.5	180	MANHOLE	PONDED/ABSORBED IN GROUND	RE-EVALUATE USE OF BACKUP GENERATORS, STANDBY PUMPS, AND VACUUM TRUCKS	NO IMPACT IDENTIFIED
210	WILLIAMS	9/17/2004	1.79 INCHES/ 1 HOUR		LIFT STATION FAILURE	1.5	160	MANHOLE	PONDED/ABSORBED IN GROUND	RE-EVALUATE USE OF BACKUP GENERATORS, STANDBY PUMPS, AND VACUUM TRUCKS	NO IMPACT IDENTIFIED
211	ZIEBACH	9/17/2004	1.79 INCHES/ 1 HOUR		LIFT STATION FAILURE	0.5	105	MANHOLE	PONDED/ABSORBED IN GROUND	RE-EVALUATE USE OF BACKUP GENERATORS, STANDBY PUMPS, AND VACUUM TRUCKS	NO IMPACT IDENTIFIED
212	ZIEBACH	9/17/2004	1.79 INCHES/ 1 HOUR		LIFT STATION FAILURE	0.5	150	PRIVATE SERVICE	PONDED IN YARD	RE-EVALUATE USE OF BACKUP GENERATORS, STANDBY PUMPS, AND VACUUM TRUCKS	NO IMPACT IDENTIFIED
213	ZIEBACH	9/18/2004	1.79 INCHES/ 1 HOUR		LIFT STATION FAILURE	2	500	COMMODE	PONDED IN BASEMENT	RE-EVALUATE USE OF BACKUP GENERATORS, STANDBY PUMPS, AND VACUUM TRUCKS	OVERFLOWED IN HOUSE
214	WILLIAMS	9/23/2004			BLOCKAGE (GREASE)	2.75	165	MANHOLE	PONDED	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
215	WILLIAMS	9/27/2004			BLOCKAGE (GREASE)	4.5	540	DITCH	PONDED-VACUUMED SPILL	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
217	WILLIAMS	10/4/2004			BREAK	1	300	MANHOLE	PONDED	INSTALL M/H & PLACE ON CLEANING CYCLE	NO IMPACT IDENTIFIED
219	WILLIAMS	10/12/2004			BLOCKAGE (GREASE)	0.75	100	MANHOLE	VACUUMED	PLACE ON CLEAN CYCLE	NO IMPACT IDENTIFIED
220	WILLIAMS	10/19/2004			BREAK	4	720	MANHOLE	ABSORBED INTO GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
221	WILLIAMS	10/20/2004			BLOCKAGE (GREASE)	1	250	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
222	WILLIAMS	10/22/2004			BLOCKAGE (ROOTS)	1	300	PRIVATE SERVICE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
223	SMITH	9/16/2004	1.79 INCHES/ 1 HOUR		HIGH LEVEL AT PLANT DUE TO POWER LOSS	4	2400	MANHOLE	PONDED	RESTORED POWER TO PLANT	NO IMPACT IDENTIFIED
224	SMITH	9/16/2004	1.79 INCHES/ 1 HOUR		LIFT STATION FAILURE	48	1680	LIFT STATION	PONDED	RE-EVALUATE USE OF BACKUP GENERATORS, STANDBY PUMPS, AND VACUUM TRUCKS	NO IMPACT IDENTIFIED
225	SMITH	10/31/2004			BLOCKAGE (GREASE)	1	60	MANHOLE	SMALL AMOUNT	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
226	WILLIAMS	11/1/2004			BLOCKAGE (GREASE)	1	325	MANHOLE	PONDED-VACUUMED SPILL	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
227	WILLIAMS	11/7/2004			BLOCKAGE (DEBRIS)	1	90	MANHOLE	PONDED-VACUUMED SPILL	POINT REPAIR	NO IMPACT IDENTIFIED
230	SMITH	11/10/2004			BLOCKAGE (GREASE)	0.75	80	MANHOLE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
233	ZIEBACH	11/25/2004			BLOCKAGE (GREASE)	1.5	270	MANHOLE	ABSORBED INTO GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
234	SMITH	11/27/2004			BLOCKAGE (GREASE)	0.5	90	PUBLIC SERVICE	PONDED/ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
236	WILLIAMS	12/1/2004			BLOCKAGE (GREASE)	1.5	900	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
238	SMITH	12/1/2004			BLOCKAGE (GREASE)	3	170	PRIVATE SERVICE	PONDED	POINT REPAIR	NO IMPACT IDENTIFIED
239	WILLIAMS	12/3/2004			BLOCKAGE (GREASE)	0.75	80	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
240	WILLIAMS	12/3/2004			BLOCKAGE (GREASE)	0.5	700	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
248	SMITH	12/4/2004			BLOCKAGE (GREASE)	0.75	80	PRIVATE SERVICE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
250	WILLIAMS	12/7/2004			BREAK	1	45	COMMODE	CONTAINED INSIDE APT	POINT REPAIR	OVERFLOWED IN HOUSE

Table 1: 2004 Sanitary Sewer Overflows Not Reaching Waters of the State or United States
 (As required by Consent Decree Paragraph 21.c.ii)

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

OCCURANCE ID	COLLECTION SYSTEM	DISCHARGE DATE	SEVERE NATURAL EVENT	THIRD PARTY	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	REASON FOR NOT REACHING WATER COURSE	CORRECTIVE ACTION	NATURE OF IMPACT ON HEALTH AND ENVIRONMENT
251	WILLIAMS	12/7/2004			BREAK	1	65	COMMODE	CONTAINED INSIDE APT	POINT REPAIR	OVERFLOWED IN HOUSE
252	SMITH	12/10/2004			BLOCKAGE (ROOTS)	1	60	MANHOLE	ABSORBED IN GROUND	INSTALL MAIN LINE LINER	NO IMPACT IDENTIFIED
253	WILLIAMS	12/15/2004		THIRD PARTY	BREAK	4	300	FORCE MAIN	CONTAINED AT SITE	POINT REPAIR	NO IMPACT IDENTIFIED
254	WILLIAMS	12/17/2004			BLOCKAGE (GREASE)	0.75	225	MANHOLE	ABSORB IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
255	SMITH	12/18/2004			BLOCKAGE (GREASE)	0.25	100	MANHOLE	ABSORB IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
257	SMITH	12/21/2004			BLOCKAGE (GREASE)	1.25	140	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
259	ZIEBACH	12/22/2004			BLOCKAGE (GREASE)	0.5	125	MANHOLE	ABSORBED IN GROUND	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
261	WILLIAMS	12/26/2004			BLOCKAGE (GREASE)	2	10	MANHOLE	ABSORBED IN GROUND	POINT REPAIR	NO IMPACT IDENTIFIED
262	WILLIAMS	12/29/2004		THIRD PARTY	BREAK	0.25	200	FORCE MAIN	BERM CONSTRUCTED TO CONTAIN SSO	POINT REPAIR	NO IMPACT IDENTIFIED

Table 2: 2004 Unpermitted Discharges Reaching Waters of the State or United States
(As required by Consent Decree Paragraph 21.b.ii)

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

OCCURRENCE ID	COLLECTION SYSTEM	DISCHARGE DATE	SEVERE NATURAL EVENT	THIRD PARTY	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	FLOW DESTINATION (STREAM)	CORRECTIVE ACTION	NATURE OF IMPACT ON HEALTH AND ENVIRONMENT
001	WILLIAMS	1/1/2004			BLOCKAGE (DEBRIS)	2.5	750	MANHOLE	MOORE CREEK	RE-LAY DEPRESSED SEWER LINE	NO IMPACT IDENTIFIED
006	WILLIAMS	1/5/2004			BLOCKAGE (GREASE)	5	3000	MANHOLE	MILKHOUSE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
016	WILLIAMS	1/17/2004			LIFT STATION FAILURE	2	12000	MANHOLE	ESLAVA CREEK	PURCHASE SPARE HYDRAULIC DRIVE AND GEARBOX	NO IMPACT IDENTIFIED
017	WILLIAMS	1/17/2004			LIFT STATION FAILURE	2	9000	MANHOLE	ESLAVA CREEK	PURCHASE SPARE HYDRAULIC DRIVE AND GEARBOX	NO IMPACT IDENTIFIED
018	WILLIAMS	1/17/2004			LIFT STATION FAILURE	2	4200	MANHOLE	ESLAVA CREEK	PURCHASE SPARE HYDRAULIC DRIVE AND GEARBOX	NO IMPACT IDENTIFIED
030	ZIEBACH	1/26/2004			BLOCKAGE (GREASE)	2	1200	MANHOLE	PERCH CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
042	WILLIAMS	2/9/2004			BLOCKAGE (GREASE)	1	1200	MAIN LINE	ESLAVA CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
044	SMITH	2/12/2004			INFIL/INFLOW	0.5	60	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
045	WILLIAMS	2/12/2004			INFIL/INFLOW	3	7200	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
046	WILLIAMS	2/12/2004			INFIL/INFLOW	1	900	MANHOLE	BOLTON BRANCH	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
047	WILLIAMS	2/12/2004			INFIL/INFLOW	2	600	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
048	WILLIAMS	2/12/2004			INFIL/INFLOW	1.75	2000	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
049	WILLIAMS	2/12/2004			INFIL/INFLOW	2	2400	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
050	SMITH	2/12/2004			INFIL/INFLOW	1	180	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
051	WILLIAMS	2/12/2004			INFIL/INFLOW	1.5	190	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
052	WILLIAMS	2/12/2004			INFIL/INFLOW	0.25	30	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
061	WILLIAMS	2/15/2004			BLOCKAGE (DEBRIS)	4.5	15	MANHOLE	ESLAVA CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
062	WILLIAMS	2/15/2004			BLOCKAGE (DEBRIS)	4.5	540	MANHOLE	ESLAVA CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
065	SMITH	2/23/2004			INFIL/INFLOW	1	120	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
069	WILLIAMS	2/25/2004			INFIL/INFLOW	1	300	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
070	WILLIAMS	2/25/2004			INFIL/INFLOW	0.5	900	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
071	WILLIAMS	2/25/2004			INFIL/INFLOW	1	120	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
072	WILLIAMS	2/25/2004			INFIL/INFLOW	1	5100	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
073	WILLIAMS	2/25/2004			INFIL/INFLOW	4.75	325	MANHOLE	BOLTON BRANCH	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
075	WILLIAMS	2/26/2004			BREAK	2.25	1400	FORCE MAIN	ROBINSON BAYOU	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
077	SMITH	2/29/2004			BREAK	0.25	500	FORCE MAIN	CROOKED CREEK	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
080	WILLIAMS	3/3/2004			BREAK	0.75	250	FORCE MAIN	DOG RIVER	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
081	ZIEBACH	3/4/2004			BLOCKAGE (GREASE)	0.75	2400	MANHOLE	ROBINSON BAYOU	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
091	WILLIAMS	3/17/2004			BREAK	2.5	300	PRIVATE SERVICE	DEER RIVER	POINT REPAIR	NO IMPACT IDENTIFIED
092	WILLIAMS	3/17/2004			BREAK	3.25	600	MANHOLE	DEER RIVER	POINT REPAIR	NO IMPACT IDENTIFIED
093	SMITH	3/18/2004			BLOCKAGE (GREASE)	1	1200	MANHOLE	THREE MILE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
101	WILLIAMS	3/24/2004			BLOCKAGE (GREASE)	1.25	525	MAIN LINE	ESLAVA CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
103	WILLIAMS	3/25/2004			BREAK	1	300	FORCE MAIN	DOG RIVER	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
107	WILLIAMS	4/5/2004			BLOCKAGE (GREASE)	0.75	600	MANHOLE	ESLAVA CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
112	WILLIAMS	4/13/2004			BLOCKAGE (DEBRIS)	1.25	750	MANHOLE	HALLS MILL CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
113	WILLIAMS	4/13/2004			BLOCKAGE (GREASE)	1.25	750	MANHOLE	HALLS MILL CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
115	WILLIAMS	4/16/2004			BLOCKAGE (DEBRIS)	7	10500	MANHOLE	HALLS MILL CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
119	WILLIAMS	4/22/2004			BLOCKAGE (GREASE)	2	600	MANHOLE	ESLAVA CREEK	REMOVE MANHOLE DEBRIS	NO IMPACT IDENTIFIED
121	WILLIAMS	4/26/2004		THIRD PARTY	BLOCKAGE (DEBRIS)	4.5	2600	MANHOLE	MONTLIMAR CREEK	REMOVE DEBRIS AND BOLT-DOWN MH LID	NO IMPACT IDENTIFIED
134	ZIEBACH	5/18/2004			BLOCKAGE (GREASE)	4	2400	MANHOLE	ROBINSON BAYOU	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
135	ZIEBACH	5/18/2004			BLOCKAGE (GREASE)	1.5	90	MANHOLE	ROBINSON BAYOU	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
140	WILLIAMS	6/14/2004	2.10 INCHES/1 HOUR		INFIL/INFLOW	3.25	650	MANHOLE	DOG RIVER	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
141	WILLIAMS	6/14/2004	2.10 INCHES/1 HOUR	THIRD PARTY	BREAK	3	3600	MANHOLE	ESLAVA CREEK	REPAIR BY-PASS PUMP	NO IMPACT IDENTIFIED
143	WILLIAMS	6/14/2004	2.10 INCHES/1 HOUR	THIRD PARTY	BREAK	1	900	MANHOLE	ESLAVA CREEK	REPAIR AND MOVE WATER LINE	NO IMPACT IDENTIFIED
145	SMITH	6/15/2004	1.16 INCHES/1 HOUR		BLOCKAGE (GREASE)	3.5	1050	MANHOLE	ESLAVA CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
146	SMITH	6/15/2004	1.16 INCHES/1 HOUR		INFIL/INFLOW	8	4800	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
147	SMITH	6/15/2004	1.16 INCHES/1 HOUR		INFIL/INFLOW	7	6300	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
148	WILLIAMS	6/15/2004	1.16 INCHES/1 HOUR		INFIL/INFLOW	7	2075	MANHOLE	DOG RIVER	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
149	SMITH	6/15/2004	1.16 INCHES/1 HOUR		INFIL/INFLOW	6.5	1950	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
150	SMITH	6/15/2004	1.16 INCHES/1 HOUR		INFIL/INFLOW	6.5	1950	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
151	WILLIAMS	6/15/2004	1.16 INCHES/1 HOUR	THIRD PARTY	BREAK	3	900	MANHOLE	ESLAVA CREEK	UPGRADE BYPASS PUMP	NO IMPACT IDENTIFIED

Table 2: 2004 Unpermitted Discharges Reaching Waters of the State or United States
(As required by Consent Decree Paragraph 21.b.ii)

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

OCURRENCE ID	COLLECTION SYSTEM	DISCHARGE DATE	SEVERE NATURAL EVENT	THIRD PARTY	CAUSE OF DISCHARGE	DURATION (HOURS)	ESTIMATED VOLUME (GAL.)	DISCHARGE SOURCE	FLOW DESTINATION (STREAM)	CORRECTIVE ACTION	NATURE OF IMPACT ON HEALTH AND ENVIRONMENT
152	WILLIAMS	6/15/2004	1.16 INCHES/1 HOUR	THIRD PARTY	BREAK	4	4600	MANHOLE	BOLTON BRANCH	UPGRADE BYPASS PUMP	NO IMPACT IDENTIFIED
153	WILLIAMS	6/15/2004	1.16 INCHES/1 HOUR	THIRD PARTY	BREAK	11	13000	MANHOLE	ESLAVA CREEK	REPAIR BYPASS PUMP	NO IMPACT IDENTIFIED
154	SMITH	6/15/2004	1.16 INCHES/1 HOUR		INFIL/INFLOW	2.5	1500	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
160	WILLIAMS	6/22/2004			BREAK	0.25	50	MAIN LINE	CAMPGRND BR CRK	POINT REPAIR	NO IMPACT IDENTIFIED
163	SMITH	6/26/2004			BLOCKAGE (GREASE)	1	130	MANHOLE	THREE MILE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
164	SMITH	7/2/2004			LIFT STATION FAILURE	0.75	450	MANHOLE	CLEAR CREEK	LIFT STATION REPAIR AND MAINTENANCE	NO IMPACT IDENTIFIED
165	SMITH	7/5/2004			LIFT STATION FAILURE	0.25	100	LIFT STATION	EIGHTMILE CREEK	LIFT STATION REPAIR AND MAINTENANCE	NO IMPACT IDENTIFIED
185	SMITH	8/10/2004	1.70 INCHES/1 HOUR		INFIL/INFLOW	0.5	150	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
186	SMITH	8/11/2004	2.76 INCHES/1 HOUR		INFIL/INFLOW	1.75	500	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
188	SMITH	8/12/2004	1.75 INCHES/1 HOUR		INFIL/INFLOW	1	300	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
189	WILLIAMS	8/12/2004	1.75 INCHES/1 HOUR		INFIL/INFLOW	0.5	150	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
190	SMITH	8/12/2004	1.75 INCHES/1 HOUR		INFIL/INFLOW	0.75	400	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
191	SMITH	8/12/2004	1.75 INCHES/1 HOUR		INFIL/INFLOW	1	600	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
192	SMITH	8/12/2004	1.75 INCHES/1 HOUR		INFIL/INFLOW	4.5	30000	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
194	WILLIAMS	8/23/2004			BLOCKAGE (GREASE)	2	3000	MAIN LINE	THREE MILE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
196	WILLIAMS	8/25/2004			BLOCKAGE (GREASE)	1.5	90	MAIN LINE	THREE MILE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
199	SMITH	8/30/2004	2.57 INCHES/1 HOUR		INFIL/INFLOW	3.5	3150	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
200	SMITH	8/30/2004	2.57 INCHES/1 HOUR		INFIL/INFLOW	1.75	1575	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
201	SMITH	8/30/2004	2.57 INCHES/1 HOUR		INFIL/INFLOW	0.5	2250	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
202	SMITH	8/30/2004	2.57 INCHES/1 HOUR		INFIL/INFLOW	1	2550	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
205	DECENTRALIZED	9/3/2004		THIRD PARTY	BREAK	9	1020	FORCE MAIN	HAMILTON CREEK	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
208	ZIEBACH	9/15/2004	1.79 INCHES/1 HOUR	THIRD PARTY	PLANT EVACUATION	15.5	1100000	PLANT OUTFALL	MOBILE BAY	PLANT BACK IN SVC AFTER HURRICANE	NO IMPACT IDENTIFIED
216	WILLIAMS	9/30/2004	1.79 INCHES/1 HOUR		BREAK	6.5	900	MANHOLE	ESLAVA CREEK	POINT REPAIR / CIPP	NO IMPACT IDENTIFIED
218	SMITH	10/8/2004			BREAK	1.25	1050	MAIN LINE	THREEMILE CREEK	POINT REPAIR	NO IMPACT IDENTIFIED
228	SMITH	11/11/2004	1.30 INCHES/1 HOUR		INFIL/INFLOW	1.5	450	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
229	SMITH	11/11/2004	1.30 INCHES/1 HOUR		INFIL/INFLOW	2	1800	MANHOLE	THREE MILE CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
231	WILLIAMS	11/15/2004		THIRD PARTY	BREAK	4	720	FORCE MAIN	RABBIT CREEK	FORCE MAIN POINT REPAIR	NO IMPACT IDENTIFIED
232	SMITH	11/17/2004			BLOCKAGE (GREASE)	2	120	MANHOLE	THREE MILE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
235	SMITH	11/28/2004			BLOCKAGE (GREASE)	1.5	900	MANHOLE	THREEMILE CREEK	PLACED ON CLEANING CYCLE	NO IMPACT IDENTIFIED
241	SMITH	12/5/2004	2.17 INCHES/1 HOUR		INFIL/INFLOW	1.5	450	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
242	WILLIAMS	12/5/2004	2.17 INCHES/1 HOUR		INFIL/INFLOW	2	3000	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
243	SMITH	12/5/2004	2.17 INCHES/1 HOUR		INFIL/INFLOW	2.25	390	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
244	WILLIAMS	12/5/2004	2.17 INCHES/1 HOUR		INFIL/INFLOW	2	1250	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
245	SMITH	12/5/2004	2.17 INCHES/1 HOUR		BREAK	2	3000	MANHOLE	THREE MILE CREEK	NO FURTHER ACTION	NO IMPACT IDENTIFIED
246	WILLIAMS	12/5/2004	2.17 INCHES/1 HOUR		INFIL/INFLOW	1	600	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
247	SMITH	12/5/2004	2.17 INCHES/1 HOUR		INFIL/INFLOW	2.5	3875	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED
249	SMITH	12/7/2004			BLOCKAGE (ROOTS)	5	1500	MAIN LINE	THREE MILE CREEK	POINT REPAIR	NO IMPACT IDENTIFIED
258	SMITH	12/21/2004	2.30 INCHES/1 HOUR		INFIL/INFLOW	1.75	1050	MANHOLE	ESLAVA CREEK	CONDUCT I/I REHAB IN AREA	NO IMPACT IDENTIFIED