

JEFFERSON COUNTY, ALABAMA
TURKEY CREEK COMPLETE WASTE
TREATMENT SYSTEM
CONSENT DECREE TERMINATION
PLAN



JEFFERSON COUNTY COMMISSION
ENVIRONMENTAL SERVICES DEPARTMENT

November 10, 2008

TURKEY CREEK COMPLETE WASTE TREATMENT SYSTEM

CONSENT DECREE TERMINATION PLAN

Request for Termination

The Jefferson County Commission, Jefferson County, Alabama, submits this report and seeks termination of Civil Actions No. 93-G-2492-S and No. 93-G-2947-S, Consolidated, hereinafter the Consent Decree, for the Turkey Creek Complete Waste Treatment System. This request is made in accordance with Section XXIV, Termination, Part A.1.

This report contains documentation which demonstrates that the County has achieved and maintained compliance with all applicable provisions of Section VII of the Consent Decree.

With respect to compliance with NPDES permit effluent limits, this report contains documentation that demonstrates that the County has achieved and maintained substantial compliance in accordance with Section XXIV A.1.a.


With respect to compliance with the objective of elimination of sewer system overflows (SSOs), this report contains documentation that demonstrates that the County has achieved and maintained substantial compliance in accordance with Section XXIV A.1.b.

Jefferson County has paid all currently pending stipulated penalties. No monetary obligations are due except for those related to the Supplemental Environmental Project (SEP) as set forth in Section 24, paragraph (A)(2) of the Consent Decree.

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 the information, I certify that 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.

David Denard



Director, Environmental Services Department

BACKGROUND

In 1993, Citizen Plaintiffs filed a complaint against Jefferson County, Alabama, alleging that the County violated the Clean Water Act by discharging pollutants to surface waters without the required National Pollutant Discharge Elimination System (NPDES) permits and had violated the terms and conditions of its NPDES permits during periods of wet weather. In 1994, the United States Environmental Protection Agency (EPA) filed a similar complaint and the Cahaba River Society filed a Motion to Intervene and Complaint in Intervention, all of these seeking injunctive relief and the assessment of civil penalties. The allegations focused on permit violations that occurred as the result of automatic bypasses and overflows of untreated wastewater from the County's wastewater collection systems, or sewers, and bypasses at the County's wastewater treatment plants of wastewater that had not received full treatment.

On December 9, 1996, all parties entered into a Consent Decree that outlined actions to be taken by the County in order to comply with the Clean Water Act. The Consent Decree required the County to eliminate bypasses and overflows at all overflow points in the County's wastewater collection systems and at the County's wastewater treatment plants; to unify the various municipal wastewater collection systems discharging to the County's wastewater treatment plants under the ownership, maintenance, and operation of the County; and to design and implement a Supplemental Environmental Project (SEP) to purchase priority-based riparian buffer zones, or greenways, along County streams to enhance water quality. The SEP required the County to set aside and spend \$30,000,000 in the acquisition of the greenways. In addition, the County paid an initial civil penalty of \$750,000 to the United States Treasury on January 7, 1997.

The County began preliminary sewer system analyses of its Complete Waste Treatment Systems in 1995 prior to the filing of the Consent Decree as a good faith effort to show intent to comply with the Clean Water Act during periods of wet weather. Results from these analyses facilitated the planning process to design and implement specific programs that would bring the County into compliance with the Consent Decree and the Clean Water Act. Program activities included repairs and improvements to the County's wastewater collection systems that eliminated all automatic bypasses and reduced infiltration/inflow (I/I) to these systems. Improvements at the County's wastewater treatment plants eliminated bypasses and enabled the full treatment of all wastewater flows received at these plants.

TURKEY CREEK COMPLETE WASTE TREATMENT SYSTEM
CONSENT DECREE TERMINATION PLAN

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I. COMPLIANCE WITH SECTION X OF THE CONSENT DECREE

In accordance with Section X of the Consent Decree, the County submitted payment for civil penalty in the amount of \$750,000 on January 7, 1997 via wire transfer directly to the US Treasury.

II. COMPLIANCE WITH SECTION XI OF THE CONSENT DECREE

The County certifies that it has paid all penalties and monetary obligations assessed under the Consent Decree at the time of this submission.

Table II-1				
EPA Demand Date	SSO Date Range		Amount	Result
	From	Through		
10/27/97	11/01/95	08/31/97	\$61,000	Demand Rescinded By EPA
09/26/06	09/01/97	03/31/06	\$339,000	Paid In Full
01/16/08	04/01/06	10/31/07	\$238,000	Paid In Full

Documentation of each payment is included in Appendix I. Jefferson County has not received any other demand notices as of the date of submission of this report.

III. COMPLIANCE WITH SECTION VII

The County certifies that all requirements of Section VII, Remedial Actions, are complete for the Turkey Creek Complete Waste Treatment System. This report addresses the requirements of Section VII with respect to the Turkey Creek Complete Waste Treatment System (Turkey Creek System) and documents the County's performance by categorizing remedial actions into the following items A through E.

A. Phase I Planning Documents

Phase I planning documents required as a part of the Section VII, paragraphs B, C, E, G, I, K, L, and N are shown in the Table III-1 with the submittal date to EPA and EPA approval date listed. The Phase I documents were not unique to the Turkey Creek System and were inclusive of each complete waste treatment system operated by the County.

Table III-1		
Phase I Document	Submittal Date	EPA Approval Date
Preliminary Sewer System Analysis (PSSA)	10/30/1995	12/18/1995
Infiltration & Inflow (I/I) Plan	11/20/1995	12/15/1995
Sewer System Evaluation Survey (SSES) Plan	01/02/1996	02/02/1996
Capacity Analysis Plan	11/13/1995	03/18/1996
Comprehensive Performance Evaluation (CPE) Plan	12/15/1995	02/01/1996
Water Quality Monitoring Plan (WQM)	02/26/1996	08/30/1996
Initial Waste Treatment System Capital Improvement Plan (WTSCIP)	01/19/1996	02/15/1996
Unpermitted Discharge Event Program	10/30/1995	1

1 – No approval required

B. Phase II Reports

Phase II reports, plans, and schedules specific to the Turkey Creek System required as a part of Section VII, paragraphs D, F, J, and M are shown in Table III-2 with the submittal date to EPA and EPA approval date listed.

Table III-2		
Phase II Document	Submittal Date	EPA Approval Date
Infiltration & Inflow Report	05/01/1996	06/13/1996
Sewer System Evaluation Survey Report	9/28/1999	11/19/1999
Capacity Analysis Report	12/23/1999	1
Capacity Improvement Schedule	6/20/2000	8/21/2000
Comprehensive Performance Evaluation Report	03/20/1997	03/28/1997
Performance Improvement Plans	7/25/1997	11/3/1997
WTSCIP Amendment No. 12	2/1/2001	3/7/2001

1- No response required

C. Phase III Implementation

Phase III encompasses the implementation of repairs and improvements (Section VII., paragraphs H, O, and P) identified in Waste Treatment System Capital Improvement Plan (WTSCIP) Amendment No. 12 submitted February 1, 2001. The WWTP improvements identified in the Performance Improvement Plan (PIP) included additional sludge drying beds, ultraviolet disinfection and revised piping to increase hydraulic capacity. The WWTP construction work was completed prior to the submittal of WTSCIP Amendment No. 12. The WTSCIP Amendment No. 12 proposed the itemized sewer rehabilitation recommendations from the approved SSES report be addressed and all covered manholes be located and raised to grade. The required work was incorporated into two rehabilitation contracts that were completed by April 30, 2003 in advance of the Section VII,

Paragraph H.3 deadline of September 1, 2007. Table III-3 summarizes the Phase III work.

Table III-3			
Phase III Contracts	Final Contract Value	Construction Completion	Consent Decree Deadline
Turkey Creek Sanitary Sewer System Rehabilitation Contract 1	\$9,858,203.83	4/30/2003	9/1/2007
Turkey Creek Sanitary Sewer System Rehabilitation Contract 2	\$1,516,342.78	4/30/2003	9/1/2007
Turkey Creek WWTP Phase 1 Construction ¹	\$3,274,754.49	8/30/1998	9/1/2007

¹- The WWTP improvements identified in the PIP were completed prior to the submission of the WTSCIP Amendment No. 12.

Phase III also includes submission of the Collection System Operation and Maintenance Plan and implementation of the Water Quality Monitoring Program. Table III-4 summarizes these Phase III remedial actions.

Table III-4		
Phase III Remedial Action	Submittal Date	Implementation Date
Collection System O&M Plan	1/18/2001	7/12/2001
Water Quality Monitoring Program	2/26/1996	12/02/1996

D. Reporting Requirements

In accordance with Section VII, Paragraph Q., Reporting Requirements, and subparagraphs Q.1, K.4, and N.4, the County has complied with the requirements to submit Quarterly Reports, monthly summaries of Unpermitted Discharge Events, and has performed all requirements set forth in the Water Quality Monitoring program and submitted all associated data.

E. Sewer Collection System Unification

In accordance with Section VII, Paragraph R., Municipalities, the County has complied with the requirements to create a unified system which includes all Collection Systems served by any of the County's Wastewater Treatment Plants. Table III-5 below lists the municipal systems served by County WWTP's and the date of transfer of those systems to the County.

Table III-5	
Municipality	Effective Date
Brighton	March 1, 1998
Fultondale	March 1, 1998
Gardendale	March 1, 1998
Graysville	March 1, 1998
Homewood	March 1, 1998
Hoover	March 1, 1998
Hueytown	March 1, 1998
Lipscomb	March 1, 1998
Mountain Brook	March 1, 1998
Pleasant Groove	March 1, 1998
Tarrant	March 1, 1998
Trussville	March 1, 1998
Vestavia Hills	March 1, 1998
Birmingham	May 1, 1998
Adamsville	August 1, 1998
Bessemer	August 1, 1998
Fairfield	August 1, 1998
Irondale	August 1, 1998
Leeds	August 1, 1998
Midfield	August 1, 1998
Warrior	August 1, 1998

IV. COMPLIANCE WITH SECTION VIII OF THE CONSENT DECREE

In accordance with Section VIII of the Consent Decree, the County has performed all obligations and has observed or fulfilled all conditions with respect to the Supplemental Environmental Project (SEP) Greenways Project. The County submitted the SEP Master Plan Final Report on July 19, 1999, and began its implementation including the establishment of the Black Warrior /Cahaba Land Trust (hereinafter the Land Trust) to direct and oversee purchases of prioritized parcels along Jefferson County stream corridors. The SEP Final Report was submitted on December 9, 2006, outlining SEP activities and expenditures completed in accordance with the Master Plan. A 12-month extension was granted to the County and the Land Trust to complete remaining activities including the transfer of SEP parcels and funds between the County and the Land Trust, completing all pending property transactions and parcel site inventories, and performing initial property maintenance and site security measures. These activities were formalized in a Memorandum of Agreement (MOA) between the County and the Land Trust and documented in two amendments to the Final Report (See Table IV-1).

To date all SEP expenditures and activities are complete with the exception of the Five Mile Creek Constructed Wetlands Project, with the Land Trust to oversee the design,

construction and completion of this project. The Land Trust will make a final report regarding this special project upon its completion and submit this report to EPA Region IV and the County. The County has also agreed to perform Benthic Macroinvertebrate Assessments at six approved stream-sites annually through calendar year 2011. Reports for these assessments will be submitted to EPA Region IV annually on or before December 31st through 2011. The final report on the Five Mile Creek Constructed Wetlands Project will be included with the 2008 Benthic Macroinvertebrate Assessment submission to EPA on or before December 31, 2008.

Table IV – 1	
SEP Document	Submittal Date
Final Master Plan	July 19, 1999
Final Report	December 9, 2006
Amendment No. 1	June 9, 2007
Amendment No. 2	December 9, 2007 ¹

1- EPA accepted amendment 1/18/08

V. VERIFICATION

Although not required in the Consent Decree, EPA has requested that the County verify that the repairs recommended by the Sewer System Evaluation Survey (SSES) were completed. This section describes the County's verification methodology and summarizes the results. Detail is provided in Appendix II.

This certification is in addition to the oversight and certificates provided during construction by Jefferson County and contracted consulting engineers at the project level. The following describes the steps and levels of protocol for an item of work to be included for payment and to be ultimately shown as work completed on as-as-constructed drawing:

A repair is completed by a Contractor. The repair details are then recorded by the Consultant and/or Jefferson County Inspector in a field diary. The field diary entries are used to compose the Consultant Engineer's project work summary. A work order is generated by the Consultant in SIMS. At the end of the month the Consultant Engineer and Inspector(s) meet to discuss quantities for that month. Following this meeting the Inspector(s) meet with the Contractor to discuss monthly quantities. An invoice is then generated by the Contractor. The invoice is then reviewed and certified by the Consultant Engineer and subsequently reviewed by the County Engineer. The invoice is then signed by the ESD Director for authorization for payment. At the end of the Contract, as-as-constructed drawings are created according to the methodology described in the following definition.

A. Methodology

The following definitions apply to the verification procedure herein described.

1. Definitions

As-Constructed Drawings: The Engineer's record drawing of all work performed in a specific contract. These documents are typically created by a Consultant CAD Technician from Consultant and/or County Inspector field diaries and notes and maps from the Consultant Engineer of Record.

Document Control Log (DCL): A summary of verified repairs for each complete waste treatment system.

Document Verification Form: A form used by a Jefferson County Engineer to verify SSES recommended repairs (from existing documentation) for the purposes of this termination request.

Engineer's Project Work Summary: A binder of record, separated by type of repair, organized by mini-system and manhole number showing all pertinent information for each SSES recommended repair. This document is composed by the Consultant Engineer and Inspector of Record (Consultant or County) and is generated from the inspector's field diaries.

Field Check: A site visit by a Jefferson County Inspector used to verify work completed. This may be done by direct visual inspection or remote television inspection.

Field Diary: A bound document, composed daily during a contract, filled out by the on-site inspector, showing work completed. This document is used by the Consultant Engineer and County and/or Consultant Inspector of Record to generate monthly invoice quantities.

Inspector Field Verification Form: A form used by a Jefferson County Inspector to verify SSES recommended repairs (from field inspection) for the purposes of this termination request.

SIMS Manhole Photograph: This is a photograph of a manhole showing at least one permanent feature in the background, the compass direction in which the picture was taken and the manhole number.

SIMS Work Order: A database created within the Sewer Infrastructure Management System (SIMS) to catalog completed repair information, searchable through line and manhole selection. Work orders are created by the Consultant from Inspector's field diary information or by County employees after a repair has been completed.

2. Verification Procedure

This verification procedure will serve to demonstrate that the SSES recommended sewer rehabilitation work was performed in accordance with the Consent Decree for the Turkey Creek Complete Waste Treatment System.

a) Statistical Analysis

The SSES recommended repairs were placed into separate Excel spreadsheets according to their complete waste treatment system. Within each complete waste treatment system spreadsheet, every SSES recommended repair for that system was assigned a number corresponding to the row in which it was located. The specific repairs to be confirmed were randomly selected via an Excel random number generator from the spreadsheet containing a list of all SSES recommended repairs, in this case, for the Turkey Creek Complete Waste Treatment System.

A statistical analysis was used to determine an appropriate number of random samples to be examined in order to verify that the SSES recommended repairs were addressed in the Turkey Creek Complete Waste Treatment System.

The number of samples selected to represent the collection system were based on a formula put forth by Krejcie and Morgan (1970) for determining sample sizes for research activities. Calculations were based on the following formula for a known population size:

$$\text{Sample Size} = \frac{X^2NP(1-P)}{d^2(N-1) + X^2P(1-P)}$$
$$\text{Sample Size} = \frac{(3.841)*(1419)*(0.95)*(1-0.95)}{(0.05)^2 *(1419-1) + (3.841)*(0.95)*(1-0.95)} = 69.5 \approx 70$$

Where:

X^2 is the table value of Chi-Square at 1 degree of freedom for a 95 percent confidence level (3.841). N is the population size (total number of recommended repairs for a collection system). P is the population proportion, which is the minimum percentage of SSES recommended repairs assumed to be performed in each individual complete waste treatment system basin. And d is the degree of accuracy expressed as a proportion (0.05 was used to represent 95% accuracy).

Consequently, the number of randomly-selected repairs checked demonstrates that at least 95% of the total number of repairs were performed at a confidence level of 95%.

In addition to the sample size generated by the above referenced process, an additional sample pool consisting of twenty-five (25) random repairs is generated to form a secondary sample pool. The purpose of this pool is described in the following section *Records and Field Review*.

b) Records and Field Review

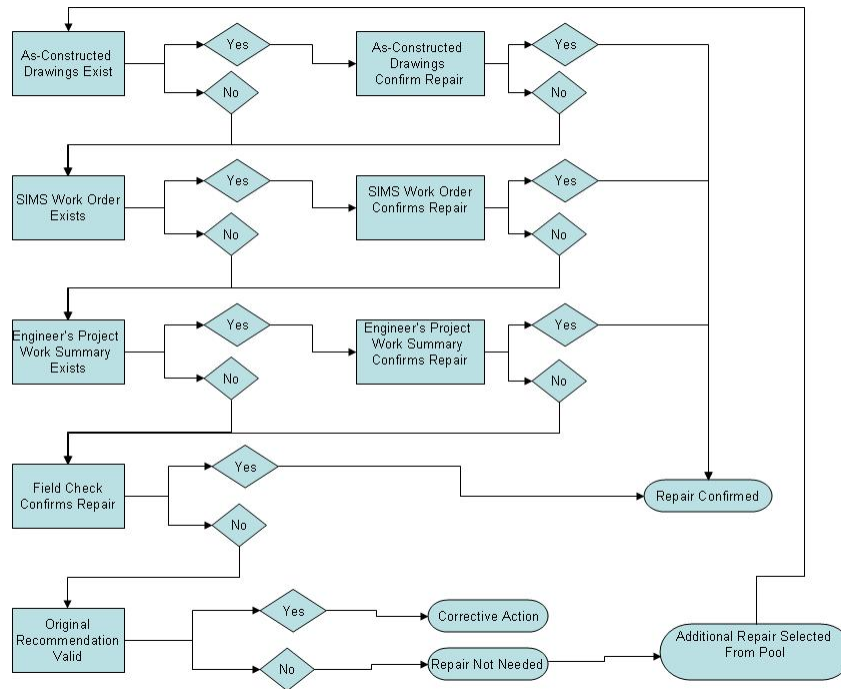
The following records were used in the verification process:

1. As-Constructed Drawings – Document Verification Form
2. SIMS Work Orders – Document Verification Form
3. SIMS Manhole Photograph – Document Verification Form
4. Field Checks – Inspector Field Verification Form

The verification process was performed based on the decision flow chart in Figure V-1. This process was documented via a document control log and associated forms where applicable. The aforementioned forms identified the randomly selected repair, with an attached photocopy of the documentation of the repair from records 1, 2 and 3. If no documentation of the repair was found in these records, a field check was performed to confirm that the repair was addressed. The field checks were made by County staff at the site of the recommended repair as visual verification of the current status of the recommended repair. A form signed by the field inspector confirming the status of the repair is included for documentation.

In addition when an SSES recommended repair has been investigated and found to be “not warranted”, an additional SSES recommended repair is selected from the next sequential random repair from the secondary sample pool. The substituted random repair is then investigated in the same manner as that of the original sample set.

Figure V-1.



B. Summary of Verification Results

The verification procedure was successful in confirming the 95% confidence level for SSES repair work performed in the Turkey Creek collection system in that at least 67 repairs within the 70 repairs sample have been addressed. Of the seventy (70) random repairs within the sample pool, forty-three (43) were confirmed by record documents and seventeen (17) were confirmed through field inspections. Seven (7) of the SSES recommended repairs were determined through field inspections to be insignificant and not in need of repair (therefore addressing the original SSES recommendation), and three (3) SSES recommended repairs had been not performed at the time of the inspection, but have since been corrected.

Because seven (7) recommended repairs in the original sample set were found to be “not warranted”, seven (7) additional recommended repairs were selected from the secondary sample pool. All seven (7) of these recommended repairs were field inspected, two (2) by direct visual inspection and five (5) by remote

television inspection. Five (5) field inspections documented that work had been performed addressing the SSES recommendation. Two (2) field inspections found no significant defect requiring repair confirming the original SSES repair recommendation had been addressed.

Because two (2) recommended repairs in the secondary sample set were found to be “not warranted”, two (2) additional recommended repairs were again selected from the secondary sample pool. One (1) repair was confirmed through document verification, and one (1) through field inspection. The document verification confirmed that work had been performed addressing the SSES recommendation. The field inspection found no significant defect requiring repair confirming the original SSES repair recommendation had been addressed.

Once again, because one (1) recommended repair was found to be “not warranted”, one (1) additional recommended repair was selected from the secondary sample pool. The repair was confirmed through document verification.

In summary, a total of eighty (80) SSES recommended repairs were investigated as a part of the verification procedure. Sixty-seven (67) recommended repairs were documented as performed, and ten (10) recommended repairs were determined to be not warranted. Only three (3) of the eighty (80) sample set were found not performed at the time of the inspection. The verification procedure was successful in confirming the 95% confidence level for SSES repair work performed in the Turkey Creek collection system

Detailed documentation relevant to this summary is included in Appendix II.

VI. SUBSTANTIAL COMPLIANCE WITH SECTION XXIV OF THE CONSENT DECREE

The County has complied with the requirements to achieve and maintain substantial compliance with respect to NPDES permit limitations and with the objective of elimination of Sewer System Overflows. The period of substantial compliance is identified and the support documentation is described below.

A. Substantial Compliance Period

Section XXIV A.1 of the Consent Decree establishes that the County is to achieve and maintain

...compliance with all applicable provisions of Section VII ... (for each complete waste treatment system for a period of)... twelve (12) consecutive months, provided that during that 12-month period the County can establish

that precipitation has been average or greater. In the absence of evidence of average or greater than average precipitation during a 12-month period, the County shall be permitted to demonstrate compliance at such Complete Waste Treatment System during a 24-month period.

The County used the period from July 1, 2005 through June 30, 2006 as the 12 consecutive months that exhibits substantial compliance in accordance with Section XXIV.A.1. of the Consent Decree. This 12-month consecutive period had above average rainfall of 56.13 inches for the Birmingham/Turkey Creek area as indicated by National Weather Service records.

The County used rainfall data compiled by the National Weather Service Observation Station at the Birmingham, Alabama, International Airport to establish average rainfall for the Turkey Creek system. The 30-year average rainfall at this weather observation station (1971-2000) was 53.99 inches. This rainfall amount was used as the basis for establishing the substantial compliance period of consecutive 12-months of average precipitation. The 12-month substantial compliance period for the Turkey Creek Complete Waste Treatment System was determined to be for a period of average to above-average precipitation for the Birmingham/Turkey Creek area after the recommended work in the Consent Decree was completed. All recommended sewer rehabilitation work for the Turkey Creek Complete Waste Treatment System was completed on April 30, 2003.

B. NPDES Permit Effluent Limits

In accordance with Section XXIV.A.1.a., the County has complied with the requirements to achieve and maintain substantial compliance with respect to NPDES permit limitations at the Turkey Creek Wastewater Treatment Plant (WWTP) for the consecutive twelve (12) month period of July 1, 2005 through June 30, 2006. There were no permit violations during the evaluation period.

The Turkey Creek WWTP has undergone significant construction over the past several years. The former plant was a 4,000,000 gallon average daily design capacity facility that was originally constructed in 1970, underwent upgrades in the 70's, 80's and 90's, and decommissioned April 1, 2004 when the new plant became operational. The sludge drying beds and the 14 MG aerated peak flow holding pond are all that remain of the former plant. The upgraded plant consists of new headworks and influent screw pump structure, two 3.44 MG aeration basins, four final clarifiers, four peak flow clarifiers, UV disinfection facilities, two aerobic digesters, and covered drying beds. See Appendix III for the flow schematic and process flow narrative for the WWTP.

In Appendix IV the County has included copies of the Turkey Creek NPDES Permit Discharge Monitoring Reports (DMRs) for this period to verify substantial

compliance with NPDES permit effluent limits as established in Section XXIV.A.1.a. of the Consent Decree.

C. Bypasses

In accordance with Section VII.B.4. of the Consent Decree, the County has complied with the elimination of all automatic bypasses including Hurricane Branch, Horsefarm, Barton Branch, Tarrant Branch, and Watkins Branch, and the County has complied with the elimination of bypasses at all wastewater treatment plants.

There were zero (0) occurrences of bypasses, as defined by the Consent Decree, within the Turkey Creek Complete Waste Treatment System during the evaluation period.

D. Sanitary Sewer Overflows (SSO's)

In accordance with Section XXIV.A.1.b, the County has complied with the objective of elimination of sewer system overflows and has achieved and maintained substantial compliance for the consecutive twelve (12) month period of July 1, 2005 through June 30, 2006 for the Turkey Creek Complete Waste Treatment System.

The County has implemented a Management, Operation, and Maintenance (MOM) Program integrated with an aggressive Grease Control Program to achieve and maintain the objective of elimination of sewer system overflows. There were no overflows in the Turkey Creek Complete Waste Treatment System during the evaluation period.

1. Management, Operation, and Maintenance Program

The County's Management, Operation, and Maintenance (MOM) Program ensures the appropriate operation of the sanitary sewer collection system by implementing effective management and maintenance practices. The MOM Program document outlines these management and maintenance practices and is used by County staff to direct operations to meet the objective of substantial compliance in all applicable areas.

The Turkey Creek Complete Waste Treatment System has been operating under the County's Collection System Operation and Maintenance (O&M) Plan as approved by EPA in July 2001. By utilizing the programs outlined in the O&M Plan, the County has been able to achieve the objective of substantial compliance for the Turkey Creek collection system. In order to continue to achieve and maintain substantial compliance, the County has updated its O&M Plan and created a Collection System Management, Operations, and Maintenance (MOM) Program. This is a strategic planning

document that is updated as the MOM Program evolves. The current version of the County's MOM Plan is included in Appendix V for reference.

In addition, the County has developed a Capacity Assurance Program (CAP), submitted to EPA on June 25, 2008, which is applicable to all the County's complete waste treatment systems. Like the MOM, the CAP is a strategic planning document that is updated as the program evolves. The CAP is currently in the early stages of implementation. Because the Turkey Creek Complete Waste Treatment System currently does not have capacity issues, EPA has agreed that the termination of the Consent Decree with respect to the Turkey Creek Complete Waste Treatment System can go forward prior to EPA's review and approval of the CAP. The current version of the County's CAP is included in Appendix VII for reference.

2. Grease Control Program

The Jefferson County Commission adopted a Grease Control Ordinance in October 2006 as part of a comprehensive plan to achieve the objective of the elimination of sewer system Overflows due to grease blockages. The Grease Control Program (GCP) operates out of the County's Barton Laboratory Monitoring and Compliance Division and utilizes a permitting and inspection process to monitor Food Service Facility (FSF) discharges to the County's sanitary sewer collection systems. The GCP permits require FSFs to install and maintain grease handling devices in order to reduce grease discharges to the sewer. The GCP operates in conjunction with the County's Line Maintenance Division in identifying chronic grease problems. The above-mentioned divisions work together to report, inspect, repair, and prevent grease blockages in the sewer. These objectives are achieved via a joint communication, reporting, and inspection system, utilizing the County's Sewer Infrastructure Management System (SIMS) and a Cityworks database. Detail may be found in the County's MOM. A copy of the Grease Control Program Ordinance is included as Appendix VI.