

Mayor Bill Stankiewicz
Reginald Jackson, Post 1
Marichal Price, Post 2
Fred Higgins, Post 3
George Bailey, Post 4
Theresa Strickland, Post 5

City of Hogansville



David Milliron, City Manager
Lisa Kelly, City Clerk
Jeff Todd, City Attorney

400 E Main St
Hogansville GA 30230-1196
706-637-8629 | cityofhogansville.org

Notice of Violation

Monday, September 16, 2019

James Stephens, Chairman
Meriwether County Water & Sewerage Authority (MCWSA)
17234 Roosevelt Hwy Bldg B
Greenville, GA 30222

Dear Chairman Stephens:

This letter serves as a Notice of Violation (NOV) of the City of Hogansville's Wastewater Utility Use Ordinance and our joint Intergovernmental Agreement Regarding Construction of Wastewater Treatment and Disposal Plant. A review of the laboratory results indicates that the Meriwether County Water & Sewer Authority has discharged constituents that consistently exceed the limits set by the City's Wastewater Utility Use. A list of the ordinance effluent violations is included in "Attachment A" of the enclosed document together with detailed documentation and correspondence detailing the City's efforts to seek compliancy by the MCWSA.

The City of Hogansville's Wastewater Utility Use Ordinance (18-0827B as amended) authorizes the local government to levy a maximum fine of \$2,500 for each violation. These fines are daily and each day the limits are exceeded can be considered a separate and distinct violation. As of this writing, the City has already levied fines totaling \$82,500 that have not yet been paid for documented ordinance effluent violations on:

- December 5, 2018
- December 12, 2018
- December 19, 2018
- January 8, 2019
- February 7, 2019
- February 20, 2019
- March 6, 2019
- March 27, 2019
- April 10, 2019
- April 24, 2019
- May 8, 2019
- May 29, 2019
- June 4, 2019
- July 9, 2019
- July 23, 2019
- August 6, 2019

Furthermore, the City is levying an additional \$5,000 in fines for documented ordinance effluent violations on:

- August 27, 2019 | Ammonia Nitrogen (412) | Total Kjeldahl Nitrogen (460)

Please know located in the documents section, under utilities, on the city's website at www.cityofhogansville.org is a copy of the city's enacted Wastewater Utility Use Ordinance and Enforcement Response Plan. If you have any questions, please contact me at (706) 637-8629.

Sincerely,


David A. Milliron
City Manager

/attachments

Laboratory Reports - Meriwether County Water Sewer Authority - Exhibit A

Location	Grab Date	Acidity	Ammonia Nitrogen	Biochemical Oxygen Demand (BOD-5)	Total Fats, Oils or Grease (FOG), Total HEM	pH	Total Kjeldahl nitrogen	Total Phosphorus (P)	Violations	Maximum Fine	Assessed Fine
Dongwon	12/15/2016	BDL	82.2	463	11.1	8.87	246	70.30			
Mando No. 1	12/15/2016	10	134.0	491	50.4	8.55	210	64.20			
Mando No. 2	12/15/2016	BDL	12.0	94	9.5	7.04	57	8.23			
Meriwether Well	12/15/2016	180	229.0	1,660	61.2	7.99	259	10.10			
Meriwether Well	12/11/2017	BDL	156.0	89	25.1	7.49	172	9.25			
Meriwether Well	2/6/2018	BDL	149.0	182	11.2	7.46	226	4.08			
Meriwether Well	2/14/2018	BDL	193.0	189	18.7	7.56	176	5.80			
Meriwether Well	2/21/2018	BDL	172.0	118	20.6	7.54	212	6.00			
Meriwether Well	2/28/2018	BDL	184.0	129	18.4	7.49	215	5.80			
Sewer Use Ordinance Limits - Ordinance Enacted 8/27/2018		n/a	20 mg/L	250 mg/L	100 mg/L	Normal Domestic Range (6.5 - 8.5)	20 mg/L	n/a	Violations	Maximum Fine	Assessed Fine
Meriwether Well	12/5/2018	165	203.0	136	14.3	7.46	229	6.20	2	\$ 5,000	\$ 2,500
Meriwether Well	12/12/2018	138	235.0	162	5.4	7.75	280	2.12	2	\$ 5,000	\$ 2,500
Meriwether Well	12/19/2018	BDL	175.0	138	17.7	7.26	168	8.40	2	\$ 5,000	\$ 2,500
Meriwether Well	1/8/2019	166	127.0	283	13.2	7.52	174	4.42	3	\$ 7,500	\$ 7,500
Meriwether Well	2/7/2019	145	322.0	357	13.2	7.60	328	1.13	3	\$ 7,500	\$ 7,500
Meriwether Well	2/20/2019	240	360.0	247	18.4	7.54	318	6.06	2	\$ 5,000	\$ 5,000
Sewer Use Ordinance Limits - Ordinance Amended 3/4/2019		n/a	20 mg/L	250 mg/L	100 mg/L	Normal Domestic Range (6.5 - 8.5)	20 mg/L	10 mg/L	Violations	Maximum Fine	Assessed Fine
Meriwether Well	3/6/2019	184	268.0	199	12.4	7.77	292	3.87	2	\$ 5,000	\$ 5,000
Meriwether Well	3/27/2019	183	224.0	190	15.6	7.45	265	7.38	2	\$ 5,000	\$ 5,000
Meriwether Well	4/10/2019	161	425.0	264	18.5	7.84	495	1.43	3	\$ 7,500	\$ 7,500
Meriwether Well	4/24/2019	121	205.0	106	24.0		189	3.74	2	\$ 5,000	\$ 5,000
Meriwether Well	5/8/2019	135	232.0	86	26.2	7.85	245	3.15	2	\$ 5,000	\$ 5,000
Meriwether Well	5/29/2019	212	186.0	102	124.0	7.08	234	8.55	3	\$ 7,500	\$ 7,500
Meriwether Well	6/4/2019	139	355.0	96	9.7	7.77	312	6.45	2	\$ 5,000	\$ 5,000
Meriwether Well	7/9/2019	219	247.0	152	5.8	7.52	282	1.77	2	\$ 5,000	\$ 5,000
Meriwether Well	7/23/2019	156	252.0	198	BDL	7.70	332	5.14	2	\$ 5,000	\$ 5,000
Meriwether Well	8/6/2019	166	305.0	54	5.2	7.52	298	8.34	2	\$ 5,000	\$ 5,000
Meriwether Well	8/27/2019	133	412.0	55	2.6	7.71	460	5.54	2	\$ 5,000	\$ 5,000



103 Carroll Circle
 Carrollton, GA 30117
 (770) 832-2171

Laboratory Report

September 11, 2019

CITY OF HOGANSVILLE
 400 East Main St.
 Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 8/27/2019

Type Sample: Wastewater

LAB NUMBER: 119746

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 8/27/2019 @ 0730, 0735, 0740, 0745

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	133	5	mg/L as CaCO30		9/5/2019 0920	
SM 4500-NH3 H	Ammonia As N	412	5.0	mg/L		8/30/2019 1448	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	55	25	mg/L		8/27/2019 1451	JC/GS
EPA 1664B	Oil & Grease, Total HEM	2.6	1.4	mg/L	0	9/5/2019 1000	
SM 4500-H+ B	pH	7.71	NA	S.U.	H	8/27/2019 1102	AC
SM 4500-Norg D	Total Kjeldahl Nitrogen	460	6.25	mg/L		9/5/2019 1438	JC
SM 4500-P H	Total Phosphorus (P)	5.54	0.05	mg/L		8/30/2019 1151	JC

LAB NUMBER: 119746

Sample Description

CITY OF HOGANSVILLE

MERIWETHER CO. GA - SEWAGE - GRAB 8/27/2019 @ 0730, 0735, 0740, 0745

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

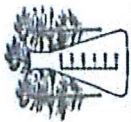
Janet Inez

103 Carroll Circle / Carrollton, GA 30117 / 770-832-2171 / Fax 770-832-3200

Georgia Laboratory Certification No. 810. NELAP Laboratory ID E871132 for Non-Potable Water - General Chemistry, Non Potable Water Microbiology.

Flagging Criteria

- H - Sample analyzed outside of recommended hold time.
- 0 - Subcontract Lab NELAP 460181



Environmental Labs & Services Inc.
103 Carroll Circle Carrollton, GA 30117
770-832-2171 www.els-inc.net

CHAIN-OF-CUSTODY RECORD

The Chain-of-Custody Record is a LEGAL DOCUMENT

COC001
REV 2.1
6/14/2018

Page: of

Client Name: City of Hogansville
 Address: 400 East Main
 E-mail: WWP@cityofhogansville.org
 Phone: 706 977 6856 Cell:
 Requested TAT:
 Report To:
 Copy To:
 Purchase Order #:
 Quote #:

By signing this form you are accepting ELS's Net 30 day payment terms and agreeing to late charges of 1.5% per month for any invoices not paid within 30 days. Submission of samples to the laboratory constitutes acceptance of ELS's Terms & Conditions.

Sample Identification	Matrix Code ¹	Grab	Composite		Composite End / Grab		# of Containers	Preservation ²	To Be Filtered: Y / N	ANALYSIS REQUESTED				ELSLAB NUMBER
			Date	Time	Date	Time				BOD PH	Acid. Alk.	NH3 TN	OTG	
BOD PH ①	WW	X	8-27-19	7:30 AM	8/27/19	7:30 AM	1							119746-1
Acidity ②	WW	X	8-27-19	7:35 AM			1							-2
NH3 TN, Tot. P ③	WW	X	8-27-19	7:40 AM			1							-3
OTG ④	WW	X	8-27-19	7:45 AM			1							-4

SAMPLED BY: Mark Hammond DATE/TIME: 8-27-19 7:30 AM RELINQUISHED BY: Mark Hammond DATE/TIME: 8-27-19 7:50 AM
 RECEIVED BY: Paul Gilliam DATE/TIME: 8-27-19 7:50 AM RELINQUISHED BY: Paul Gilliam DATE/TIME: 8/27/19 09:20
 RECEIVED BY: Paul Gilliam DATE/TIME: 8/27/19 09:20 RELINQUISHED BY: Paul Gilliam DATE/TIME: 8/27/19 09:20
 ENTERED INTO DATABASE: Paul Gilliam COC REVIEWED: Paul Gilliam
 SAMPLE SHIPPED VIA: UPS FED-EX USPS COURIER CLIENT ELS OTHER:
 AIR BILL#
 COOLER#: 14
 CUSTODY SEALED COOLER: Y 14
 RECEIVED ON ICE: SN
 SAMPLES INTACT: SN
 COMMENTS: 27-19

¹Matrix Codes: A = Air GW = Groundwater DW = Drinking Water SW = Surface Water ST = Storm Water S = Soil SL = Sludge SD = Solid P = Product WW = Waste Water
²Preservation Codes: H = Hydrochloric Acid N = Nitric Acid S = Sulfuric Acid X = Sodium Hydroxide I = Ice Only O = Other NA = None

Environmental Labs & Services, Inc.
SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Astoria

ELS Lab #: 119746

	YES	NO	N/A	Details	Comments
Shipping container / cooler received in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	damaged <input type="checkbox"/> leaking <input type="checkbox"/>	
Custody seals present on shipping container?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Custody seals intact on shipping container?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Were samples received with ice present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Temperature blanks present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Cooler temperature within limits of 0-6°C? (see below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	cooling initiated <input checked="" type="checkbox"/>	
Chain of Custody (COC) present?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
COC signed, dated, and timed when relinquished and received?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Sampler name and/or signature on COC?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<u>PH out</u>	
Were all samples received within holding time?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
TAT marked on the COC?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		If not indicated proceed with standard TAT <input checked="" type="checkbox"/>

Cooler 1 Temp: 14 °C Cooler 2 Temp: _____ °C Cooler 3 Temp: _____ °C Cooler 4: _____ °C Cooler 5: _____ °C

	YES	NO	N/A	Details	Comments
Were sample containers intact upon receipt?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Custody seals present on sample containers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Custody seals intact on sample containers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Do sample container labels match the COC?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	incomplete <input type="checkbox"/> illegible <input type="checkbox"/> no label <input type="checkbox"/>	
Are analyses requested indicated on the COC?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Were all of the samples listed on the COC received?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	samples received but not listed <input type="checkbox"/> samples listed but not received <input type="checkbox"/>	
Was the sample collection date/time noted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Were VOA samples received without headspace (< 1/4" bubble)?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Were trip blanks submitted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

	YES	NO	N/A	Details	Comments
Have containers needing chemical preservation been checked?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Do containers meet chemical preservation guidelines?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		
Was the pH adjusted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>		

I certify that I have completed this form (date/initial): 8/29/19 *cd*