

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

Friday, September 6, 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 \$22,500 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

Furthermore, the City is levying an additional \$60,000 in fines for documented ordinance effluent violations on:

- 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

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

CITY OF HOGANSVILLE
400 East Main Street
Hogansville, GA 30230

COPY

ATTACHMENT NO. 1

Date: December 15, 2011

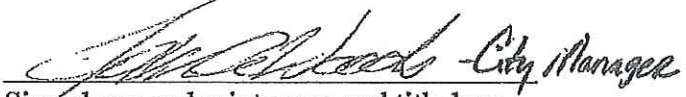
Unit Coordinator
Georgia Environmental Protection Division
Engineering & Technical Support Program
4220 International Parkway Suite 101
Atlanta, Georgia 30354

RE: Pump Stations and Force Main
to Hogansville

Dear Sir/Madam:

This is to certify that: (a) the City of Hogansville has reviewed this project; (b) the City of Hogansville is willing to accept wastewater from the project for treatment; and (c) the City of Hogansville and the Meriwether County Water and Sewerage Authority have entered into an intergovernmental agreement that ensures that all provisions of applicable erosion and sediment control programs in Meriwether County will be enforced by Meriwether County.

Sincerely,

 *City Manager*
Sign above and print name and title here

- 2B. List, by month, the average daily flow (MGD) and effluent concentrations (mg/l) for biochemical oxygen demand (BOD₅) and suspended solids (SS) for the immediately preceding 12 months for the wastewater (on discharge monitoring reports).

Month	Flow	BOD ₅	SS	Month	Flow	BOD ₅	SS
Jan	.271	10.6	15.0	Jul	.183	25.0	21.0
Feb	.489	33.0	16.0	Aug	.185	12.0	25.0
Mar	.687	20.3	60.0	Sept	.211	10.0	15.0
Apr	.463	13.0	11.0	Oct	.190	4.3	36.0
May	.242	10.0	20.0	Nov	.209	14.0	40.0
Jun	.187	21.0	20.0	Dec	.222	3.0	40.0

- 3A. Name of developer (if not a local government, a certified statement as indicated in 8 is required with this submittal). See attached example.

Name

Mailing Address

City, County, State, Zip Code

- 3B. Proposed service area (this project).

Immediate _____ acres Ultimate _____ acres

- 3C. Type of developments: (check as applicable)

Industrial _____ Residential _____ Commercial _____ Other _____ (explain)

- 3D. Population to be served

Population _____ Density/acre _____

- 3E. Per capita wastewater contribution

Average _____ GPD Peak _____ GPD

11-008

LEWIS, TAYLOR & TODD, P.C.
ATTORNEYS AT LAW
SUITE 3
205 NORTH LEWIS STREET
POST OFFICE DRAWER 1027
LAGRANGE, GEORGIA 30241

JOHN M. TAYLOR
JEFFREY M. TODD
BRYAN G. FORSYTH

March 7, 2012

VIA EMAIL

JAMES R. LEWIS
(1928-1996)
GEORGE E. SIMS, JR.
(1917-1967)
FAX (706) 882-4905
TELEPHONE (706) 882-2501

Mr. James A. Woods, City Manager
CITY OF HOGANSVILLE
james.a.woods@cityofhogansville.org

RE: Meriwether County Water and Sewerage Authority Contract

Dear James:

As you know, just prior to your arrival the City of Hogansville and Meriwether County entered two agreements regarding waste water treatment. In one of the agreements (Intergovernmental Agreement Regarding Construction of Wastewater Treatment and Disposal Plant) Meriwether County made certain commitments concerning policing its wastewater collection system.

Through Section 5.3 of the agreement, the Meriwether County Water and Sewerage Authority agreed to have the Meriwether County Board of Commissioners adopt, in substantial form, a sewer use ordinance like that in force in Hogansville (Sections 98-111 through 98-166). Hogansville retained the right to review, comment and approve the ordinance to be adopted.

Finally, Meriwether County also agreed to adopt similar requirements as those adopted by Hogansville with regard to grease trap and waste receptor issues (Section 98-139).

I recently received from Meriwether County attorney Bob Trammell the proposed ordinance through which Meriwether is attempting to comply with Section 5.3 of the agreement, and attach same herewith for your review and comment.

I look forward to hearing from you after you have had an opportunity to review.

With best regards, I am

Very truly yours,

LEWIS, TAYLOR & TODD, P.C.


Jeffrey M. Todd

JT/atb
Attachment

LEWIS, TAYLOR & TODD, P.C.

ATTORNEYS AT LAW
SUITE 3
205 NORTH LEWIS STREET
POST OFFICE DRAWER 1027
LAGRANGE, GEORGIA 30241

JOHN M. TAYLOR
JEFFREY M. TODD
BRYAN G. FORSYTH

JAMES R. LEWIS
(1928-1996)
GEORGE E. SIMS, JR.
(1917-1967)
FAX (706) 882-4905
TELEPHONE (706) 882-2501

October 8, 2012

VIA EMAIL

Mr. James A. Woods, City Manager
CITY OF HOGANSVILLE
400 E. Main Street
Hogansville, Georgia 30230
james.a.woods@cityofhogansville.org

RE: Meriwether County Ordinance

Dear James:

As you may recall, although these arrangements were made prior to your coming to Hogansville, Meriwether County was required to adopt a sewer use ordinance under the terms of its agreement with the City of Hogansville regarding wastewater treatment and disposal. I believe I have forwarded to you in the past one or two drafts of the ordinance at Meriwether County's request.

Enclosed herewith please find the final ordinance as adopted by Meriwether County on May 9, 2012. Meriwether County attorney Bob Trammell asked that I forward the attached to you to insure that the City of Hogansville has no objections to the ordinance, as adopted.

As I understand it, the ordinance was adopted using Hogansville's ordinance as a model, but I have not reviewed it word for word to determine whether there are any significant modifications. If you would like for us to do so, please let me know. Otherwise, please let me know whether you find the ordinance to be acceptable.

With best regards, I am

Very truly yours,

LEWIS, TAYLOR & TODD, P.C.

Jeffrey M. Todd

JT/atb
Enclosure



cityofhogansville.org

City of Hogansville
400 East Main Street
Hogansville, Georgia 30230
Phone 706-637-8629
Fax 706-637-4813

October 29, 2013

Meriwether County Water and Sewerage Authority
Attn: Jerry Loftin, Chairman
17234 Roosevelt Highway, Bldg. B
Greenville, Ga. 30222

Dear Mr. Loftin:

This is to advise the Meriwether County Water and Sewerage Authority that the Hogansville WWTP is prepared to accept wastewater and sanitary sewage from Turkey Run Landfill, subject to compliance with all wastewater treatment standards and requirements of applicable state and federal regulations and the relevant terms and conditions for the discharges of industrial wastewater in compliance with the Hogansville and Meriwether County Sewer Use Ordinances. The Operator of the Turkey Run Landfill should proceed to coordinate with the appropriate representative of the Authority in consultation with Hogansville to complete the steps necessary to initiate discharge of the wastewater and sanitary sewage from the Turkey Run Landfill in accordance with the rules and regulations of the Operator. Please keep us informed throughout the process for the Operator to make connection of the Turkey Run Landfill facilities to the wastewater discharge and collection system constructed by the Authority in that area of Meriwether County to the Hogansville WWTP.

Yours Truly,

James A. Woods
City Manager



flh

**MERIWETHER COUNTY WATER & SEWERAGE
AUTHORITY**

17234 ROOSEVELT HIGHWAY, BUILDING B

GREENVILLE, GEORGIA 30222

706-672-3493

Jerry Loftin, Chairman

Larry Dunaway, Treasurer

Robert Lovett

Tammye Hicks

Danny Walton

PLEASE NOTE

2ND MAILING 10/31/2013

May 30, 2013

VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED

Mr. Tom Carroll
Vice President Business Development- South
Waste Management
6962 Main Street
Woodstock, GA 30188

Mr. James Wood
City of Hogansville
400 East Main Street
Hogansville, Georgia 30230

Mr. Gene Barnes
Waste Management
Atlanta West Hauling - Smyrna
3001 South Pioneer Drive
Smyrna, GA 30082

Greenland (AL), LLC
The Green Companies
P.O. Box 43352
Birmingham, AL 35243-0352
Attention: Andrew Brown, President

Re: Notice of Completion of Sanitary Sewer and Wastewater Treatment System

Gentlemen:

Reference is hereby made to that certain Real Estate and Utilities Easements Donation Agreement (the "POTW Real Estate Agreement") dated January 14, 2009, by and between Greenland, LLC, Greenbow, LLC, and the Meriwether County Water and Sewerage Authority.

This letter is to advise you that the sanitary sewer and wastewater treatment system is now fully installed and available for connection to the Turkey Run Landfill site. If you have any questions, please do not hesitate to contact the Meriwether County Water and Sewerage Authority for assistance or additional information regarding connection.

Very truly yours,

Jerry Loftin
Chairman



WASTE MANAGEMENT
1850 Parkway Place
Suite 600
Marietta, GA 30067

June 11, 2014

First Class Mail

Meriwether County Water and Sewerage Authority
17234 Roosevelt Highway, Building B
Greenville, GA 30222

Attention: Jerry Loftin and Bruce O'Neal

Re: Leachate from Turkey Run Landfill

Gentlemen:

Thank you for your May 29, 2014 letter. Having reviewed it, we still have some questions regarding it and the Turkey Run landfill's prospective discharge of its leachate to the Hogansville POTW via a Meriwether County sewer line. We appreciate your letter's invitation to consult with the City of Hogansville and/or Meriwether County because we believe it would be beneficial for Waste Management to meet with the City and the County at a mutually convenient time and location as soon as possible. The following are some of the topics Turkey Run management would like to discuss, but any answers that you and/or the City can provide in advance would be greatly appreciated.

As set forth in your letter, the Turkey Run landfill leachate has measured levels of biological oxygen demand (BOD) of 674 mg/l and chemical oxygen demand (COD) of 974 mg/l as of February 2013. In its evaluation of this leachate, the Georgia Environmental Protection Division (EPD) determined that the Turkey Run landfill should not be deemed to be a significant industrial user of the POTW, so as not to require any pretreatment permit. This is consistent with other Waste Management landfills in Georgia whose leachate has not required a pretreatment permit prior to discharge to a POTW.

Your letter also makes reference to the Meriwether County Public Sewer Use Ordinance as governing the Turkey Run landfill's prospective discharge to the Hogansville POTW. Although section 14-207(f)(12) of that ordinance contains reference to sewer use surcharges for discharges in a range from 250-500 mg/l BOD and a prohibition of discharges in excess of 500 mg/l BOD, section 14-207(p) states that nothing in that code section should be construed to prevent any special agreement or arrangement between the County and any industrial concern with higher strength discharges.

Under the terms of paragraph 9(b) of the Real Estate and Utilities Easements Donation Agreement to which Greenbow, LLC, as the owner of the Turkey Run landfill, and the

June 11, 2014

Page 2

Meriwether County Water and Sewerage Authority ("MCWSA") are parties, MCWSA agreed to provide adequate wastewater treatment capacity for the landfill's leachate. Please confirm that this agreement with the MCWSA serves the purpose of the above-referenced special agreement or arrangement so as to provide authority for discharge of the landfill's leachate, without pretreatment, to the Authority's sewer pipe and then to the Hogansville POTW. In other words, Greenbow understands that the provisions of section 14-207(p) of the above-referenced ordinance have been satisfied, despite the concentration limitations set forth in section 14-207(f)(12).

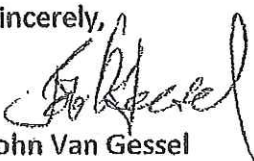
Turkey Run also wants to confirm the price to be charged by MCWSA for discharges from the landfill. Based on a review of the Meriwether County Water & Sewerage Authority's letter of January 16, 2014, we understand that MCWSA/City of Hogansville standard charges to Turkey Run are \$5.50 per 1,000 gallons or \$0.0055 per gallon, plus a base monthly charge of \$12.00. The City of Hogansville's website indicates that its base charge for commercial users is \$5.70 per month, with a supplemental charge of \$0.006060 per gallon of sewage. As noted, we would like to clarify this difference as quickly as possible. Please note that pursuant to the above-referenced agreement in which the MCSWA expressly undertook to provide leachate treatment for the landfill and pursuant to EPD's determination that the landfill is not a significant industrial user, and in further consideration of the financial benefits flowing to Meriwether County from the host fees provided in the landfill Host Agreement, as amended, we would not expect the MCSWA to propose, or Turkey Run to pay, any surcharge.

Finally, we are aware that the Hogansville POTW contemplates a modification of its facility. We do not believe that any modification should result in any changes to the arrangement between the Turkey Run landfill and MCWSA with respect to the acceptance and treatment of the landfill's leachate.

In order to make sure we are all on the same page before the Turkey Run landfill begins discharge to the MCWSA sewer line and the Hogansville POTW, Turkey Run management will be reaching out to you to schedule a meeting between appropriate representatives of the landfill, the Hogansville POTW, and MCWSA as soon as possible. Gabe will be calling Bruce O'Neal to coordinate the scheduling of such meeting shortly.

Thanks very much in advance for your anticipated cooperation.

Sincerely,



John Van Gessel
General Counsel

cc: James A. Woods, City Manager, City of Hogansville
Gabe Gribble



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

January 13, 2017

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/15/2016

Type Sample: Wastewater

LAB NUMBER: 106008

Sample Description

DONGWON - GRAB 12/15/2016 @ 0925

Analytical Method	Analyte	Detection		Units	Flag
		Result	Limit		
SM 2310B	General Chemistry				
	Acidity	BDL	1	mg/L as CaCO3	
SM 4500-NH3 H	Ammonia As N	82.2	1.2	mg/L	
SM 5210B	Biochemical Oxygen Demand (BOD-5)	463	149	mg/L	
SM 4500-NO3 I	Nitrate as N	1.14	0.05	mg/L	
SM 4500-NO2 B	Nitrite As N	1.18	0.05	mg/L	
EPA 1664	Oil & Grease, Total HEM	11.1	1.4	mg/L	
SM 4500-H+ B	pH	8.87	NA	S.U.	H
SM 4500-Norg D	Total Kjeldahl Nitrogen	246	3.12	mg/L	
SM 4500-P H	Total Phosphorus (P)	70.3	2.0	mg/L	

QUALITY ASSURANCE,

Jared Inez

RESPECTFULLY SUBMITTED,

Denny Inez



103 Carroll Circle / Carrollton, GA 30117 / 770-832-2171 / Fax 770-832-3200
Georgia Laboratory Certification No. 810 / NSF International (0D660)

Flagging Criteria

H - Sample analyzed outside of recommended hold time.
BDL - Below Detection Limit

Dongwon
12/15/2016
1/1

Page 1 of 1



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

January 13, 2017

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/15/2016

Type Sample: Wastewater

LAB NUMBER: 106006

Sample Description

MANDO #1 - GRAB 12/15/2016 @ 0945

Analytical Method	Analyte	Detection		Units	Flag
		Result	Limit		
	General Chemistry				
SM 2310B	Acidity	10	1	mg/L as CaCO ₃	
SM 4500-NH ₃ H	Ammonia As N	134	2.4	mg/L	
SM 5210B	Biochemical Oxygen Demand (BOD-5)	491	149	mg/L	
SM 4500-NO ₃ I	Nitrate as N	0.31	0.05	mg/L	
SM 4500-NO ₂ B	Nitrite As N	0.20	0.05	mg/L	
EPA 1664	Oil & Grease, Total HEM	50.4	1.6	mg/L	
SM 4500-H ⁺ B	pH	8.55	NA	S.U.	H
SM 4500-Norg D	Total Kjeldahl Nitrogen	210	3.12	mg/L	
SM 4500-P H	Total Phosphorus (P)	64.2	2.0	mg/L	

QUALITY ASSURANCE,

Jared Inez

RESPECTFULLY SUBMITTED,

Denny Inez



103 Carroll Circle / Carrollton, GA 30117 / 770-832-2171 / Fax 770-832-3200
Georgia Laboratory Certification No. 810 / NSF International (0D660)

Flagging Criteria

H - Sample analyzed outside of recommended hold time.

Mando #1
12/15/2016
1/1



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

January 13, 2017

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/15/2016

Type Sample: Wastewater

LAB NUMBER: 106007

Sample Description

MANDO #2 - GRAB 12/15/2016 @ 1005

Analytical Method	Analyte	Detection		Units	Flag
		Result	Limit		
	General Chemistry				
SM 2310B	Acidity	BDL	1	mg/L as CaCO3	
SM 4500-NH3 H	Ammonia As N	12.0	0.20	mg/L	
SM 5210B	Biochemical Oxygen Demand (BOD-5)	94	50	mg/L	
SM 4500-NO3 I	Nitrate as N	0.95	0.05	mg/L	
SM 4500-NO2 B	Nitrite As N	0.10	0.05	mg/L	
EPA 1664	Oil & Grease, Total HEM	9.5	1.3	mg/L	
SM 4500-H+ B	pH	7.04	NA	S.U.	H
SM 4500-Norg D	Total Kjeldahl Nitrogen	57.0	1.25	mg/L	
SM 4500-P H	Total Phosphorus (P)	8.23	0.20	mg/L	

QUALITY ASSURANCE,

[Signature]

RESPECTFULLY SUBMITTED,

[Signature]



103 Carroll Circle / Carrollton, GA 30117 / 770-832-2171 / Fax 770-832-3200
Georgia Laboratory Certification No. 810 / NSF International (0D660)

Flagging Criteria

H - Sample analyzed outside of recommended hold time.

BDL - Below Detection Limit

Mando # 2
12/15/2016
1/1



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

January 13, 2017

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/15/2016

Type Sample: Wastewater

LAB NUMBER: 106009

Sample Description

MERIWETHER WELL - GRAB 12/15/2016 @ 1025

Analytical Method	Analyte	Detection		Units	Flag
		Result	Limit		
	General Chemistry				
SM 2310B	Acidity	180	1	mg/L as CaCO3	
SM 4500-NH3 H	Ammonia As N	229	2.4	mg/L	
SM 5210B	Biochemical Oxygen Demand (BOD-5)	1660	149	mg/L	
SM 4500-NO3 I	Nitrate as N	BDL	0.05	mg/L	
SM 4500-NO2 B	Nitrite As N	0.05	0.05	mg/L	
EPA 1664	Oil & Grease, Total HEM	61.2	1.4	mg/L	
SM 4500-H+ B	pH	7.99	NA	S.U.	H
SM 4500-Norg D	Total Kjeldahl Nitrogen	259	3.12	mg/L	
SM 4500-P H	Total Phosphorus (P)	10.1	0.20	mg/L	

QUALITY ASSURANCE,

Jared Inge

RESPECTFULLY SUBMITTED,

Denny Inge



103 Carroll Circle / Carrollton, GA 30117 / 770-832-2171 / Fax 770-832-3200
Georgia Laboratory Certification No. 810 / NSF International (0D660)

Flagging Criteria

H - Sample analyzed outside of recommended hold time.

BDL - Below Detection Limit

Meriwether
12/15/2016
1/1



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

December 27, 2017

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/11/2017

Type Sample: Wastewater

LAB NUMBER: 111461

Sample Description

MERIWETHER CO. GA - EFFLUENT - GRAB 12/11/2017 @ 1224, 1227, 1230, 1233

Analytical Method	Analyte	Detection		Units	Flag	Analyzed	By
		Result	Limit				
SM 2310B	General Chemistry Acidity	BDL	10.0	mg/L	1	12/21/2017 1345	
SM 4500-NH3 H	Ammonia As N	156	3.0	mg/L		12/20/2017 RW 1234	
SM 5210B	Biochemical Oxygen Demand (BOD-5)	89	16	mg/L		12/12/2017 GS 1235	
EPA 1664B	Oil & Grease, Total HEM	25.1	1.3	mg/L		12/20/2017 RW 1430	
SM 4500-H+ B	pH	7.49	NA	S.U.	H	12/11/2017 KC 1721	
SM 4500-Norg D	Total Kjeldahl Nitrogen	172	6.2	mg/L		12/14/2017 RW 1437	
SM 4500-P H	Total Phosphorus (P)	9.25	0.125	mg/L		12/15/2017 RW 1647	

QUALITY ASSURANCE,

James J. Fox



RESPECTFULLY SUBMITTED,

James J. Fox

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.

1 - Subcontract Lab NELAC E87582

BDL - Below Detection Limit

12/11/2017
1/1

Page 1 of 1

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Edit Busy Categorize Delete ...

Meriwether County Water & Sewerage Authority

Tue 12/12/2017 2:00 PM - 3:00 PM

Remind me: Never

more details » <https://www.google.com/calendar/event?action=VIEW&eid=NzBvNjRlMw5jZ3E2NmI5bY0cmplYjlrNjhwbTRiOXA3NHlzOGI5bGNvcGowYzM0NjRyajBwMWpjOCBkYXZpZC5taWxsaXJvbkbjaXR5b2Zob2dhbnN2aWxsZS5vcmc&tok=MjMjbWlsbGlyb24zMDAwMkbnWFpbC5jb21kNzgyMWM0YTEzYTkyNDk4MjZmOGJhNWZjNjRlOGU0YzZmM2UyZTg3&ctz=America/New_York&hl=en>

Meriwether County Water & Sewerage Authority

When

Tue Dec 12, 2017 2pm – 3pm Eastern Time

Calendar

David Milliron

Who

•

David Milliron

- organizer

•

David Milliron

FROM: DORIS AT Meriwether County Water

PHONE: 706-672-3 Would like for you to give her a call at your earliest to confirm for a meeting date scheduled with them and several others.

***Scheduled meeting for Tuesday, December 12, 2017 at 2:00 PM.

Going?

Yes <https://www.google.com/calendar/event?action=RESPOND&eid=NzBvNjRlMw5jZ3E2NmI5bY0cmplYjlrNjhwbTRiOXA3NHlzOGI5bGNvcGowYzM0NjRyajBwMWpjOCBkYXZpZC5taWxsaXJvbkbjaXR5b2Zob2dhbnN2aWxsZS5vcmc&rst=1&tok=MjMjbWlsbGlyb24zMDAwMkbnWFpbC5jb21kNzgyMWM0YTEzYTkyNDk4MjZmOGJhNWZjNjRlOGU0YzZmM2UyZTg3&ctz=America/New_York&hl=en> -

Maybe <https://www.google.com/calendar/event?action=RESPOND&eid=NzBvNjRlMw5jZ3E2NmI5bY0cmplYjlrNjhwbTRiOXA3NHlzOGI5bGNvcGowYzM0NjRyajBwMWpjOCBkYXZpZC5taWxsaXJvbkbjaXR5b2Zob2dhbnN2aWxsZS5vcmc&rst=3&tok=MjMjbWlsbGlyb24zMDAwMkbnWFpbC5jb21kNzgyMWM0YTEzYTkyNDk4MjZmOGJhNWZjNjRlOGU0YzZmM2UyZTg3&ctz=America/New_York&hl=en>

https://www.google.com/calendar/event?action=RESPOND&eid=NzBvNjRlMw5jZ3E2NmI5bY0cmplYjlrNjhwbTRiOXA3NHlzOGI5bGNvcGowYzM0NjRyajBwMWpjOCBkYXZpZC5taWxsaXJvbkbjaXR5b2Zob2dhbnN2aWxsZS5vcmc&rst=3&tok=MjMjbWlsbGlyb24zMDAwMkbnWFpbC5jb21kNzgyMWM0YTEzYTkyNDk4MjZmOGJhNWZjNjRlOGU0YzZmM2UyZTg3&ctz=America/New_York&hl=en

1st Meeting w/
MCWSA
12/12/2017
Chairman James Stephens Stated.
MCWSA was in Compliance
w/ HGV L Ordinance
per letter from
CM James
Woods



Environmental Labs & Services, Inc.

www.els-inc.net

ELS

Laboratory Report

February 21, 2018

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 2/6/2018

Type Sample: Wastewater

LAB NUMBER: 112148

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 2/6/2018 @ 0800, 0805, 0810, 0815

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	BDL	10.0	mg/L as CaCO ₃		2/13/2018 1030	
SM 4500-NH ₃ H	Ammonia As N	149	2.40	mg/L		2/8/2018 1406	RW
SM 5210B	Biochemical Oxygen Demand (BOD-5)	182	75	mg/L		2/7/2018 1406	GS
EPA 1664B	Oil & Grease, Total HEM	11.2	1.6	mg/L		2/12/2018 1205	GS
SM 4500-H+ B	pH	7.46	NA	S.U.	H	2/6/2018 1621	AC
SM 4500-Norg D	Total Kjeldahl Nitrogen	226	3.12	mg/L		2/15/2018 1554	GS
SM 4500-P H	Total Phosphorus (P)	4.08	0.025	mg/L		2/14/2018 1430	GS

QUALITY ASSURANCE,



RESPECTFULLY SUBMITTED,

2/6/2018
1/1

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.

1 - Subcontract Lab NELAC E87582

BDL - Below Detection Limit

1st of 4



Environmental Labs & Services, Inc.

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Laboratory Report

March 06, 2018

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 2/14/2018

Type Sample: Wastewater

LAB NUMBER: 112257

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 2/14/2018 @ 0830, 0835, 0840, 0845

Analytical Method	Analyte	Detection Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	BDL	10.0	mg/L as CaCO3		2/23/2018 1115	
SM 4500-NH3 H	Ammonia As N	193	2.40	mg/L		2/16/2018 1428	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	189	144	mg/L	Q	2/14/2018 1525	KC
EPA 1664B	Oil & Grease, Total HEM	18.7	1.5	mg/L		2/26/2018 0930	GS
SM 4500-H+ B	pH	7.56	NA	S.U.	H	2/14/2018 2055	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	176	3.12	mg/L		2/16/2018 1605	GS
SM 4500-P H	Total Phosphorus (P)	5.80	0.125	mg/L		2/21/2018 1620	GS

QUALITY ASSURANCE,

RESPECTFULLY SUBMITTED,



2/14/2018
1/1

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

Q - In our review of the data, a QC deficiency was observed and flagged.

H - Sample analyzed outside of recommended hold time.

1 - Subcontract Lab NELAC E87582

BDL - Below Detection Limit

2nd

Page 1 of 1

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Laboratory Report

March 11, 2018

3rd sample

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 2/21/2018

Type Sample: Wastewater

LAB NUMBER: 112366

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 2/21/2018 @ 1030, 1025, 1040, 1045

Analytical Method	Analyte	Detection		Units	Flag	Analyzed	By
		Result	Limit				
SM 2310B	General Chemistry Acidity	BDL	10.0	mg/L	1	2/23/2018 1115	
SM 4500-NH3 H	Ammonia As N	172	2.40	mg/L		3/1/2018 1438	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	118	50.0	mg/L	1	2/22/2018 1000	
EPA 1664B	Oil & Grease, Total HEM	20.6	1.5	mg/L		3/1/2018 1500	RW
SM 4500-H+ B	pH	7.54	NA	S.U.	H	2/21/2018 1255	AC
SM 4500-Norg D	Total Kjeldahl Nitrogen	212	3.12	mg/L		2/28/2018 1641	GS
SM 4500-P H	Total Phosphorus (P)	6.00	0.125	mg/L		3/2/2018 1611	GS

QUALITY ASSURANCE,



RESPECTFULLY SUBMITTED,

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.

1 - Subcontract Lab NELAC E87582

BDL - Below Detection Limit

2/21/2018
1/1

Page 1 of 1

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Laboratory Report

March 11, 2018

4th
sample

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 2/28/2018

Type Sample: Wastewater

LAB NUMBER: 112466

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 2/28/2018 @ 1000, 1005, 1010, 1015

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	BDL	10.0	mg/L	1	3/7/2018 1000	
SM 4500-NH3 H	Ammonia As N	184	2.40	mg/L		3/1/2018 1437	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	129	50.0	mg/L	1	3/1/2018 0930	
EPA 1664B	Oil & Grease, Total HEM	18.4	1.3	mg/L		3/8/2018 1500	GS
SM 4500-H+ B	pH	7.49	NA	S.U.	H	2/28/2018 1624	RC
SM 4500-Norg D	Total Kjeldahl Nitrogen	215	3.12	mg/L		3/2/2018 1542	GS
SM 4500-P H	Total Phosphorus (P)	5.80	0.125	mg/L		3/2/2018 1624	GS

QUALITY ASSURANCE,

RESPECTFULLY SUBMITTED,



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.

1 - Subcontract Lab NELAC E87582

BDL - Below Detection Limit

2/28/2018
1/1

- (3) When Wastewater subject to a categorical Pretreatment Standard is mixed with Wastewater not regulated by the same Standard, the Director shall impose an alternate limit in accordance with 40 C.F.R. § 403.6(e).

(d) State Pretreatment Standards

A User shall comply with State Pretreatment Standards applicable to the User. If the State Pretreatment Standards are less stringent than the National Pretreatment Standards or Local Pollutant Limitations applicable to the user, the User shall comply with the more stringent standards. The State Pretreatment Standards, as amended from time to time, are hereby incorporated by reference into this Ordinance.

(e) Local Pollutant Limitations

No Person shall discharge Wastewater containing concentrations, referred to as Local Pollutant Limitations, in excess of:

20 mg/L	ammonia nitrogen
2.1 mg/L	arsenic
1.2 mg/L	cadmium
4.5 mg/L	copper
1.75 mg/L	cyanide
100 mg/L	total fats, oils or grease (FOG)
0.60 mg/L	lead
0.02 mg/L	mercury
4.1 mg/L	nickel
1.0 mg/L	phenol
1.2 mg/L	silver
20 mg/L	total Kjeldahl nitrogen
7.0 mg/L	total chromium
4.2 mg/L	zinc

The above limits apply at the point where the Wastewater is discharged to the POTW. All concentrations for metallic substances are for total metal unless indicated otherwise. The Control Authority may impose mass limitations in addition to the concentration-based limitations above.

(f) Best Management Practices

The Director may develop BMPs, by ordinance or in individual Wastewater Discharge permits, to implement Local Limits and the requirements of Sections 98-115(a) and (b).

(g) Equivalent Mass Limits

When a Categorical Pretreatment Standard is expressed only in terms of Pollutant concentrations, an Industrial User may request that the Control Authority convert the limits to equivalent mass limits. The determination to convert concentration limits to mass limits is within the discretion of the Director. The Control Authority may establish equivalent mass limits only if the Industrial User meets all the conditions listed in Sections 98-115(g)(1) and (2).

- (1) To be eligible for equivalent mass limits, the Industrial User must:
- Employ, or demonstrate that it will employ, water conservation methods and technologies that substantially reduce water use during the term of its individual Wastewater Discharge Permit;
 - Currently use control and treatment technologies adequate to achieve compliance with the applicable Categorical Pretreatment Standard, and not have used dilution as a substitute for treatment;
 - Provide sufficient information to establish the facility's actual average daily flow rate for all waste streams, based on data from a continuous Effluent flow monitoring device, as well as the facility's long-term average production rate. Both the actual average daily flow rate and the long-term average production rate must be representative of current operating conditions;
 - Not have daily flow rates, production levels, or pollutant levels that vary so significantly that equivalent mass limits are not appropriate to control the Discharge; and

Adopted 8/27/2018
HGV L Ordinance

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

Monday, October 8, 2018

Hsin-Sheng Yeh
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King Jr Dr, Suite 1152 East
Atlanta, GA 30334

Re: NOV LAS Permit No. GAJ020019

To whom it may concern:

I am in receipt of the Notice of Violation and in discussion with our Wastewater Superintendent, the City does not dispute your findings, specifically “three (3) permit effluent violations from January 2017 to January 2018.” Please note I joined the City of Hogansville in October 2018 and quickly became aware of the issues with respect to our wastewater treatment plant, but I am asking for grace on the Expedited Enforcement Compliance Order and waiver of the proposed settlement of \$1,489.

When you first inquired about the permit violations, our staff honestly admitted the following:

“The reason for the violations is filamentous organisms. The organisms cause the sludge to settle poorly. When that happens, the decanter pulls solids over to the contact chamber causing the TSS to go up. The City started adding a Fats, Oils and Grease chemical and have the filamentous organisms under control now. There should not be any more violations on the Effluent.”

Some salient facts:

- As you rightfully know, those F.O.G. chemicals come at great expense and the City has spent in excess of \$5,000 on chemicals this fiscal year.
- The violations are caused by the F.O.G. and the septic sewage that the City receives from Meriwether County. The City at considerable expense addressed the problem by daily adding the F.O.G. chemical to the Collection System, which has eliminated the high suspended solids going out of the plant.
- In November 2017, the Mayor and I met with leadership at the Meriwether County Water & Sewerage Authority and was explicitly told that the agency was at least a year away with having a pre-treatment program in place to address the F.O.G. and septic sewage it was pumping into our system, primarily from industrial customers in the Meriwether Industrial Park. This is in clear violation of our contract with the authority.
- The City has since spent \$7,500 in a complete re-write and overhaul of its Wastewater Utility Use Ordinance that the City Council adopted on August 27, 2018. A copy was transmitted to Meriwether

County and the Authority instructed to immediately come into compliance with ordinance effective December 1, 2018.

- The City has spent several thousand dollars conducting random samplings of the sewerage being sent to the City from Meriwether County and has well documented that it exceeds the thresholds in our LAS permit. We currently have an engineering firm that is investigating a solution for further controls on the intake, which is severely septic because of a failed pump system that Meriwether has failed to address.
- The City Council made the headlines when it jacked its sewerage rates by approximately 50 percent because the City was forced to build a wastewater treatment plant significantly larger than its current needs so as accept sewerage from the Meriwether Industrial Park. The plant expansion is costing Hogansville taxpayers \$8.706M less a \$2.5M USDA grant (28.7%) and a contribution of \$1.6M (18.4%) from Meriwether in exchange for 25% ownership of the plant. So, the Hogansville taxpayers are on the hook for an additional \$4.606M in long-term, make-whole debt and had to back-fund nearly \$400,000 in bond covenants from 1993 just to be able to take on the additional debt.

But we're not complaining, just explaining our situation and the cards we've been dealt and how we are trying to best manage the situation. So, yes, we admit there were violations and hopefully you understand they were beyond our control. And yes, if forced to, we'll pay the fine, but I am asking, for the sake of the taxpayers and in a city that has a zero-fund balance and among the highest utility rates with a socio-economic population incapable of sustaining such long-term without some relief, please provide us some grace on this while we get out house in order.

Sincerely,



David A. Milliron
City Manager

cc: Mark Hammond, Wastewater Superintendent

/attachments

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

Monday, November 5, 2018

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

Dear Mr. Stephens:

It has been about a year since we last chatted about Meriwether coming into compliance with the Hogansville Wastewater Utility Use Ordinance. At that point, you stated you were about a year out from getting the industrial customers in line with pre-treatment.

Our contract requires the Meriwether County Water & Sewerage Authority to be in full compliance with our ordinance and there has been significant grace given the Authority through that process. However, the Hogansville City Council adopted a comprehensive Wastewater Utility Use Ordinance at its August 27, 2018 meeting, which became effective immediately upon approval by the Mayor. A copy of the ordinance is enclosed but is otherwise available online at <https://goo.gl/ZDXy2L>.

Meriwether will need to comply with this ordinance to protect and preserve our existing infrastructure, especially with the expansion of our existing plant, as well for Hogansville to remain in compliance with its EPD permits. Please let me know should you have any questions. Our staff will be conducting monthly sampling from the intake of the Meriwether entry point to our wastewater treatment infrastructure.

Best regards,

A handwritten signature in blue ink, appearing to be "D. Milliron", is written over a horizontal line.

David A. Milliron
City Manager

/Enclosure

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

Wednesday, January 2, 2019

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

Dear Chairman Stephens:

Based upon the attached reports for December 5th and December 12th, the waste stream from Meriwether County has exceeded the Effluent Limitations for Ammonia and Total Kjeldahl Nitrogen based upon the limits established in the City of Hogansville's Wastewater Utility Use Ordinance. This ordinance allows the City to fine up to \$2,500 for each violation. This is at the discretion of the City Manager. These fines are daily and each day the limits are exceeded can be considered a separate and distinct violation.

Located in the documents section, under utilities, on the city's website at <http://www.cityofhogansville.org/> is a copy of the city's enacted Wastewater Utility Use Ordinance and Enforcement Response Plan.

Therefore, in accordance with the ordinance, I am hereby levying a \$5,000 (Five Thousand Dollars) fine for December 5th and 12th and am requesting that you or a representative of your Authority contact Superintendent Mark Hammond within the next 72 hours to put forth a work plan to work toward correction of these issues. Mr. Hammond can be reached at (706) 977-6856 or wwp@cityofhogansville.org.

Sincerely,

David A. Milliron
City Manager

/attachments



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

December 24, 2018

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/5/2018

Type Sample: Wastewater

LAB NUMBER: 116119

Sample Description

MERIWETHER CO, GA - SEWAGE - GRAB 12/5/2018 @ 0825, 0828, 0830, 0833

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	165	5	mg/L as CaCO3		12/14/2018 1011	
SM 4500-NH3 H	Ammonia As N	203	2.40	mg/L		12/10/2018 1450 JC	
SM 5210B	Biochemical Oxygen Demand (BOD-5)	136	35	mg/L		12/6/2018 1135 JC/GS	
EPA 1664B	Oil & Grease, Total HEM	14.3	1.5	mg/L		12/12/2018 0820 GS	
SM 4500-H+ B	pH	7.46	NA	S.U.	H	12/5/2018 1130 AC	
SM 4500-Norg D	Total Kjeldahl Nitrogen	229	3.12	mg/L		12/10/2018 1623 GS	
SM 4500-P H	Total Phosphorus (P)	6.20	0.125	mg/L		12/6/2018 1640 GS	

QUALITY ASSURANCE,

John K. Cooper

RESPECTFULLY SUBMITTED,

Justine Arvey



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.

O - Subcontract Lab NELAP 460181

12/5/2018
1/3

Page 1 of 1

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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
6/18/2010

Page: of

Client Name: <u>City of Hogsville</u>				Report To:				By signing this form you are accepting ELS's 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.									
Address: <u>400 East Main</u>				Copy To:													
City/State/Zip: <u>Hogansville GA 30230</u>				Purchase Order #:													
Email: <u>WWP@cityofhogansville.org</u>				Quote #:													
Phone: <u>706 637 6675</u> Cell: <u>706 977 6856</u>																	
Requested TAT:																	
Sample Identification		Matrix Code	Grab	Composite Start		Composite End / Grab		# of Containers	Preservation	To Be Filtered Y/N	ANALYSIS REQUESTED						(Gray for Lab use Only)
				Date	Time	Date	Time				BOD pH	Acidity	NH3-TKN	Total P	OTG		
Municipal Sewerage # 1-BOD		WW	X	12-5-18	8:25 AM												ELS LAB NUMBER <u>116119-1</u>
Acidity # 2		WW	X	12-5-18	8:30 AM												<u>-2</u>
NH3-N AS N		WW	X														<u>-3</u>
Total P																	<u>-4</u>
TKN # 3				12-5-18	8:30 AM												
OTG # 4		WW	X	12-5-18	8:31 AM												
SAMPLED BY: <u>Mark Hammond</u>		DATE/TIME: <u>12-5-18 8:25 AM</u>		RELINQUISHED BY: <u>Mark Hammond</u>		DATE/TIME: <u>12-5-18 8:30 AM</u>		CUSTODY SEALED COOLER: <u>Y</u> / <u>N</u>		COMMENTS							
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		RECEIVED ON ICE: <u>Y</u> / <u>N</u>									
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		SAMPLES INTACT: <u>Y</u> / <u>N</u>									
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		SAMPLES SHIPPED VIA: <u>UPS</u> <u>FED-EX</u> <u>USPS</u> <u>COURIER</u> <u>CLIENT</u> <u>ELS</u> <u>OTHER</u>									
COOLER ID: <u>120</u>		COOLER ID:		COOLER ID:		COOLER ID:		COOLER ID:		COOLER ID:		COOLER ID:		COOLER ID:		COOLER ID:	
Matrix 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																	
Preservation Codes: H=Hydrochloric Acid N=Nitric Acid S=Sulfuric Acid X=Sodium Hydroxide I=Ice Only O=Other NA=None																	

12/5/2018
2/3

Environmental Labs & Services, Inc.

SAMPLE COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/20/17

Client Name: City of Yorkville
ELS Lab #: 1110117

	YES	NO	N/A	Details	Comments
Shipping container / cooler received in good condition?	<input checked="" type="checkbox"/>				
Custody seals present on shipping container?	<input checked="" type="checkbox"/>				
Custody seals intact on shipping container?	<input checked="" type="checkbox"/>				
Were samples received with ice present?	<input checked="" type="checkbox"/>				
Temperature blanks present?	<input checked="" type="checkbox"/>				
Cooler temperature within limits of 0-6°C (see below)?	<input checked="" type="checkbox"/>			cooling initiated <input checked="" type="checkbox"/>	
Chain of Custody (COC) present?	<input checked="" type="checkbox"/>				
COC signed, dated, and timed when relinquished and received?	<input checked="" type="checkbox"/>				
Sampler name and/or signature on COC?	<input checked="" type="checkbox"/>				
Were all samples received within holding time?	<input checked="" type="checkbox"/>				
TAI marked on the COC?	<input checked="" type="checkbox"/>				

Cooler 1 Temp: 12 °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"/>				
Custody seals present on sample containers?	<input checked="" type="checkbox"/>				
Custody seals intact on sample containers?	<input checked="" type="checkbox"/>				
Do sample container labels match the COC?	<input checked="" type="checkbox"/>				
Are analyses requested indicated on the COC?	<input checked="" type="checkbox"/>				
Were all of the samples listed on the COC received?	<input checked="" type="checkbox"/>				
Was the sample collection date/time noted?	<input checked="" type="checkbox"/>				
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>				
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>				
Were VOA samples received without headspace (< 1/4" bubble)?	<input checked="" type="checkbox"/>				
Were trip blanks submitted?	<input checked="" type="checkbox"/>				

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

I certify that I have completed this form (date/initial): 12/5/18 OC

12/5/2018
3/3



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

December 24, 2018

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/12/2018

Type Sample: Wastewater

LAB NUMBER: 116176

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 12/12/2018 @ 0745, 0748, 0755, 0800

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed By
SM 2310B	General Chemistry Acidity	138	5	mg/L as CaCO ₃		12/20/2018 0932
SM 4500-NH3 H	Ammonia As N	235	2.40	mg/L		12/12/2018 GS 1429
SM 5210B	Biochemical Oxygen Demand (BOD-5)	162	25	mg/L		12/12/2018 GS 1630
EPA 1664B	Oil & Grease, Total HEM	5.4	1.3	mg/L		12/17/2018 GS 0818
SM 4500-H+ B	pH	7.75	NA	S.U.	H	12/12/2018 KC 1625
SM 4500-Norg D	Total Kjeldahl Nitrogen	280	3.12	mg/L		12/14/2018 GS 1531
SM 4500-P H	Total Phosphorus (P)	2.12	0.025	mg/L		12/14/2018 GS 1236

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

James E. Ivey

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

12/12/2018
1/3

Page 1 of 1

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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

400001
 REV 2.1
 6/14/2018

Page: of

[illegible]

12/12/2018
2/3

Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Hagermanville

EIS Lab #: 116176
Comments:

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

Cooler 1 Temp: 9 °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"/>				
Custody seals present on sample containers?	<input checked="" type="checkbox"/>				
Custody seals intact on sample containers?	<input checked="" type="checkbox"/>				
Do sample container labels match the COC?	<input checked="" type="checkbox"/>			incomplete or illegible or no label <input type="checkbox"/>	
Are analyses requested indicated on the COC?	<input checked="" type="checkbox"/>				
Were all of the samples listed on the COC received?	<input checked="" 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"/>				
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>				
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>				
Were VOA samples received without headspace (< 1/4" bubble)?	<input checked="" type="checkbox"/>				
Were trip blanks submitted?	<input checked="" type="checkbox"/>				

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

I certify that I have completed this form (date/initial): 12/12/18 OC

12/12/2018
3/3

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

Friday, January 18, 2019

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

Dear Chairman Stephens:

Based upon the attached reports for December 19th, the waste stream from Meriwether County has exceeded the Effluent Limitations for Ammonia and Total Kjeldahl Nitrogen based upon the limits established in the City of Hogansville's Wastewater Utility Use Ordinance. This ordinance allows the City to fine up to \$2,500 for each violation. This is at the discretion of the City Manager. These fines are daily and each day the limits are exceeded can be considered a separate and distinct violation.

Located in the documents section, under utilities, on the city's website at <http://www.cityofhogansville.org/> is a copy of the city's enacted Wastewater Utility Use Ordinance and Enforcement Response Plan.

Therefore, in accordance with the ordinance, I am hereby levying a \$2,500 (Two Thousand Five Hundred Dollars) fine for December 19th and am requesting a joint meeting to attempt to reach a short-term agreement related to a fee structure specifically for the Authority to cover the treatment costs for this noncompliant waste. I will be available to meet January 29th or 30th or February 1st.

Sincerely,


David A. Milliron
City Manager

/attachments



ELS

Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

January 14, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 12/19/2018

Type Sample: Wastewater

LAB NUMBER: 116283

Sample Description

MERIWETHER CO. GA - EFFLUENT - GRAB 12/19/2018 @ 0730, 0735, 0740, 0745

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	BDL	10.0	mg/L as CaCO3		12/28/2018 1420	
SM 4500-NH3 H	Ammonia As N	175	2.4	mg/L		12/20/2018 1331	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	138	11	mg/L		12/19/2018 1630	GS
EPA 1664B	Oil & Grease, Total HEM	17.7	1.5	mg/L		1/11/2019 1020	GS
SM 4500-H+ B	pH	7.26	NA	S.U.	H	12/20/2018 1630	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	168	0.25	mg/L		12/20/2018 1527	GS
SM 4500-P H	Total Phosphorus (P)	8.40	0.125	mg/L		12/21/2018 1607	GS

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

James S. Sorey

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.

1 - Subcontract Lab NELAC E87582

BDL - Below Detection Limit

12/19/2018 1/3



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

COCD01
REV 2.1
6/19/2018

Page: of

Client Name: <u>City of Haganville</u>		Report To:	
Address: <u>400 East Main, Haganville, GA 30230</u>		Copy To:	
E-mail: <u>WWP@cityofhaganville.org</u>		Purchase Order #:	
Phone: <u>706 977 6856</u>		Quote #:	
Requested TAT:			
Sample Identification		ANALYSIS REQUESTED	
Matrix Code: <u>WW</u>		Acid: <u>W</u>	
Grab		BOD, PH	
Composite		NH3, TKN	
Date		Date	
Time		Time	
Composite Start		Composite End / Grab	
# of Containers		Preservation?	
To Be Filtered: <u>Y</u>			
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Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 2.0
Effective Date: 5/20/17

Client Name: C. J. HOGANVILLE

ELS Lab #: 116283

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

Cooler 1 Temp: 5 °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"/>				
Custody seals present on sample containers?	<input checked="" type="checkbox"/>				
Custody seals intact on sample containers?	<input checked="" type="checkbox"/>				
Do sample container labels match the COC?	<input checked="" 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"/>				
Were all of the samples listed on the COC received?	<input checked="" 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"/>				
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>				
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>				
Were VOA samples received without headspace (< 1/4" bubble)?	<input checked="" type="checkbox"/>				
Were trip blanks submitted?	<input checked="" type="checkbox"/>				

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

I certify that I have completed this form (date/initial): 12/19/18 OC

12/19/2018
3/3

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

Wednesday, February 6, 2019

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

Dear Chairman Stephens:

I have highlighted the three constituents that exceeded the limits set by the City's sewer ordinance on the attached test results for January 8, 2019. This is the first report where the **BOD-5** result is in excess of the sewer ordinance limits. The Ammonia and the Total Kjeldahl Nitrogen have been consistently above the limits set by the City's sewer ordinance.

The City of Hogansville's Wastewater Utility Use Ordinance allows the municipality to fine up to \$2,500 for each violation. This is at the discretion of the City Manager. These fines are daily and each day the limits are exceeded can be considered a separate and distinct violation.

Therefore, in accordance with the ordinance, I am hereby levying a \$7,500 (Seventy-Five Hundred Dollars) fine for January 8, 2019. I am under the opinion that until the Authority implements a pretreatment program, the City of Hogansville ought to expect every sampling event to show violations of the current sewer ordinance. Therefore, I am again reiterating my request for a joint meeting to attempt to reach a short-term agreement related to a fee structure specifically for the Authority to cover the treatment costs for this noncompliant waste.

Furthermore, please accept this as formal notice that I intend to request the Hogansville City Council to amend Wastewater Utility Use Ordinance 18-0827B to maintain compliancy with our EPD permits for the wastewater treatment plant. The ordinance gives the City the right to establish other limitations for pollutants from specific sources. Specifically, Section 98-115 (c) will need to have an influent phosphorus limit between 10mg/L and 15 mg/L imposed, which is the standard for typical municipal waste with light industry. Due to our EPD permit requirements, I will be recommending the lower limit of 10mg/L to the Council. The text amendment (two public readings required) is expected to be put forth to the Council on February 18, 2019 for the first reading and on March 4, 2019 for the second reading and final adoption request.

Please know located in the documents section, under utilities, on the city's website at <http://www.cityofhogansville.org/> is a copy of the city's enacted Wastewater Utility Use Ordinance and Enforcement Response Plan.

Sincerely,

David A. Milliron
City Manager

/attachments



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

January 21, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 1/8/2019

Type Sample: Wastewater

LAB NUMBER: 116556

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 1/18/2019 @ 0815, 0820, 0825, 0830

Erpor
1/8/2019
@

Analytical Method	Analyte	LIMITS PER THE CITY SEWER ORDINANCE	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity		166	5	mg/L as CaCO30		1/17/2019 1010	
SM 4500-NH3 H	Ammonia As N	20 mg/L	127	2.40	mg/L		1/9/2019 1515	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	250 mg/L	283	85	mg/L		1/9/2019 1101	JC/GS
EPA 1664B	Oil & Grease, Total HEM		13.2	1.4	mg/L		1/18/2019 1520	GS
SM 4500-H+ B	pH		7.52	NA	S.U.		1/8/2019 1644	AC
SM 4500-Norg D	Total Kjeldahl Nitrogen	20 mg/L	174	3.12	mg/L		1/11/2019 1604	JC
SM 4500-P H	Total Phosphorus (P)		4.42	0.025	mg/L		1/14/2019 1303	JC

QUALITY ASSURANCE,

John K. Cooper

RESPECTFULLY SUBMITTED,

James Ivey



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

0 - Subcontract Lab NELAP 460181

1/8/2019
1/3

Page 1 of 1

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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: <u>City of Hoggansville</u>	Report To:
Address: <u>400 East Main Hoggansville, GA 30230</u>	Copy To:
E-mail: <u>WWP@cityofhoggansville.org</u>	Purchase Order #:
Phone: <u>706 977 6856</u>	Quote #:
Cell:	

Sample Identification	Matrix Code	Grab	Composite		Composite Start		Composite End / Grab		# of Containers	Preservation?	To Be Filtered: Y / N	ANALYSIS REQUESTED						ELS LAB NUMBER
			Date	Time	Date	Time	Date	Time				BOD	Acid.	TKN	TP	04G		
BOD, PH #1	WW	X	1-8-19	8:15AM														116556-1
Acidity #2	WW	X	1-8-19	8:20AM														-2
NH3N AS N #3	WW	X	1-8-19	8:25AM														-3
Total P, TKN																		
OTG #4	WW	X	1-8-19	8:30AM														-4

SAMPLED BY: <u>Mark Hammond</u>	DATE/TIME: <u>1-8-19 8:35AM</u>	RELINQUISHED BY: <u>T. Williams</u>	DATE/TIME: <u>1-8-19 8:35AM</u>	CUSTODY SEALED COOLER: <u>Y</u>	COMMENTS:
RECEIVED BY: <u>Paul Williams</u>	DATE/TIME: <u>1-8-19 8:35AM</u>	RELINQUISHED BY: <u>Paul Williams</u>	DATE/TIME: <u>1-8-19 1000</u>	RECEIVED ON ICE: <u>Y</u>	
RECEIVED BY:	DATE/TIME:	RELINQUISHED BY:	DATE/TIME:	SAMPLES INTACT: <u>Y</u>	
RECEIVED BY LAB: <u>Paul Williams</u>	DATE/TIME: <u>1-8-19</u>	SAMPLE SHIPPED VIA: <u>UPS</u>	FED-EX <u></u> USPS <u></u> CLIENT: <u>ELS</u>	OTHER: <u></u>	
ENTERED INTO DATABASE: <u>Paul Williams</u>	COL REVIEWED: <u>Paul Williams</u>	AIR BILL#	COOLER#	TEMPERATURE: <u>100C</u>	

Matrix 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
Preservation Codes: H = Hydrochloric Acid N = Nitric Acid S = Sulfuric Acid X = Sodium Hydroxide I = Ice Only O = Other NA = None

Comments

YES / NO N/A

damaged n leaking o

10000000

1000

cooling initiated at

1000

1000

10

24027

If not indicated proceed with standard TAT ☐

Cooler 2 Temp: _____ °C

Cooler 3 Temp:

٧٠

Cooler 4:

2. _____:5 10/000

5

2

△

incomplete □ illegible □ no label □

1000

5

2

27

2

2

Have containers needing chemical preservation been checked?

Do containers meet chemical preservation guidelines?

Was the PI adjusted?

I certify that I have completed this form (date/initial):

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

Tuesday, March 5, 2019

Meriwether County Water & Sewerage Authority
17234 Roosevelt Hwy Bldg B
Greenville, GA 30222

Dear Honorable Authority Members:

Attached is my review of the test results related to the Meriwether County Water and Sewerage Authority sewage system for treatment collected on February 7, 2019. On this test report there are three separate violations of the City's Sewer Use Ordinance. A separate fine for each violation can be levied by the City of Hogansville and per your ordinance the maximum fine levied for any violation is \$2,500. This maximum fine or any subsequent lower amount is at the option of the City. Theoretically, if the City began testing daily, each day that individual constituents in the wastewater from the Meriwether County Water and Sewer Authority violate the limits established in the Sewer Use Ordinance new fines could be imposed.

The results from this current test are troubling since they show a dramatic increase in Ammonia, BOD's, and TKN from previous reports. Although these items have normally exceeded the limits established in our ordinance, they have been consistent. The current report shows a significant increase in all three constituents and it would be helpful if the Authority could inform the City what changed in the current wastewater stream.

Therefore, in accordance with the ordinance, I am hereby levying a \$7,500 (Seventy-Five Hundred Dollars) fine for February 7, 2019. I have on numerous occasions requested a complete update from the Authority related to the implementation of an industrial pretreatment program. Additionally, it may be in both party's interest to negotiate a modified rate for wastewater treatment that will encourage the Authority to expedite implementation of a pretreatment program and eliminate the need by the City for periodic future fines based on violations determined through testing.

Furthermore, please accept this as formal notice that the Hogansville City Council acted last night to amend Wastewater Utility Use Ordinance 18-0827B to maintain compliancy with our EPD permits for the wastewater treatment plant. The ordinance gives the City the right to establish other limitations for pollutants from specific sources. Specifically, Section 98-115 (e) was amended to include an influent phosphorus limit of 10mg/L, which is the standard for typical municipal waste with light industry.

Please know located in the documents section, under utilities, on the city's website at <http://www.cityofhogansville.org/> is a copy of the city's enacted Wastewater Utility Use Ordinance and Enforcement Response Plan.

Sincerely,

A handwritten signature in black ink, appearing to read "David A. Milliron", is written over a horizontal line.

David A. Milliron
City Manager

/attachments



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

February 22, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 2/7/2019

Type Sample: Wastewater

LAB NUMBER: 116953

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 2/7/2019 @ 0815, 0818, 0822, 0825

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	145	5	mg/L as CaCO ₃		2/15/2019 0900	
SM 4500-NH ₃ H	Ammonia As N	20 mg/L 322	4.80	mg/L		2/11/2019 1419	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	250 mg/L 357	131	mg/L		2/7/2019 1438	JC/GS
EPA 1664B	Oil & Grease, Total HEM	13.2	1.4	mg/L		2/12/2019 1430	GS
SM 4500-H+ B	pH	7.60	NA	S.U.	H	2/7/2019 1359	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	20 mg/L 328	6.25	mg/L		2/8/2019 1351	JC
SM 4500-P H	Total Phosphorus (P)	1.13	0.025	mg/L		2/12/2019 1321	JC

Violations of Limits Established by the City's Sewer Use Ordinance Shown in Red and Highlighted.

QUALITY ASSURANCE,

John K. Cooper

RESPECTFULLY SUBMITTED,

James 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.

O - Subcontract Lab NELAP 460181

2/7/2019
1/3



CHAIN-OF-CUSTODY RECORD

The Chain-of-Custody Record is a LEGAL DOCUMENT

COC001
REV 2.1
5/14/2018

Page: of

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.

Client Name: <u>City of Hagerstown</u>		Report To:				
Address: <u>400 East main Hagerstown, MD 20630</u>		Copy To:				
E-mail: <u>WWPE city of hagerstown, md</u>		Purchase Order #:				
Phone: <u>706 977 6856</u>		Quote #:				
Requested TAT:						
Sample Identification	Matrix Code	Composite		Composite Start	Composite End / Grab	
		Date	Time		Date	Time
BOD, PH ①	WW	X	2-7-19 8:15 AM			
Acidity ②	WW	X	2-7-19 8:18 AM			
Ammonia As N ③	WW	X	2-7-19 8:22 AM			
TKN, Total P		X				
O + G ④	WW	X	2-7-19 8:25 AM			
SAMPLED BY: <u>Mark Hammond</u> RECEIVED BY: <u>Paul G. Williams</u> RECEIVED BY:						
DATE/TIME: 2-7-19 8:15 AM		RELINQUISHED BY: <u>T. Williams</u>		DATE/TIME: 2-7-19 8:30 AM		COMMENTS: CUSTODY SEALED COOLER: Y / N RECEIVED ON ICE: Y / N SAMPLES INTACT: Y / N
DATE/TIME: 2-7-19 8:30 AM		RELINQUISHED BY:		DATE/TIME:		
DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		
DATE/TIME: 2-7-19 8:00 AM		SAMPLE SHIPPED VIA: <u>UPS</u>		UPS	FED-EX	USPS
DATE/TIME: 2-7-19 8:00 AM		AIR BILL #		COOLER #		TEMPERATURE: <u>40</u>

CC PAVING, INC. 770.874.6544

PRINTED IN THE U.S.A. CARROLLTON, GA.

Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/30/17

Client Name: Cody Hestonville

ELS Lab #: 110953

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

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

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

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

I certify that I have completed this form (date/initial): 2/7/2019 AC

2/7/2019 3/3

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

Friday, March 15, 2019

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

Dear Chairman Stephens:

Thank you for hosting Mayor Stankiewicz, myself and engineers representing the City to discuss our mutual relationship in the treatment of waste water from the Meriwether Industrial Park. During our March 6, 2019 meeting, I mentioned I would be following up with some additional questions and document requests. Therefore, would you kindly provide the City the following documents:

- EPD letters stating pre-treatment is not required for each industrial customer of the MCWSA and for the MCWSA sanitary sewer collection system;
- A copy of the Meriwether County and/or MCWSA EPD permit to operate a sanitary sewer collection system;
- Independent laboratory analysis of the wastewater/leachate discharged by each industrial customer to the MCWSA for the last 24 months;
- Metering reports for the leachate from the Turkey Run facility for the last 24 months;
- A copy of the Sewer Use Ordinance for Meriwether County and/or MCWSA;
- A copy of the grease trap and waste receptor requirements adopted by Meriwether County and/or MCWSA;
- A detailed timeline for all efforts – past, present, and future – showing the implementation of a pre-treatment ordinance/plan by Meriwether County and/or MCWSA; and
- A draft copy of the proposed pre-treatment ordinance by Meriwether County and/or MCWSA.

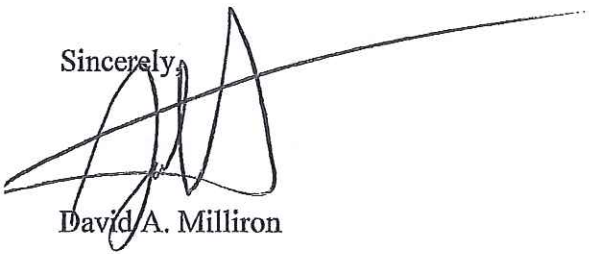
Also, in reading the August 15, 2011 agreement with the MCWSA, Hogansville is responsible for an annual calibration of the master meter. However, Waste Water Superintendent Mark Hammond tells me he wasn't ever made aware of this requirement and has noted the master meter is located inside a limited access fenced area at the MCWSA pump station. Our Superintendent will not include this master meter in his annual calibration program but will need the Authority to provide access inside the gated area. I suspect such access is governed by Paragraph 8.3 in Article 8 (Miscellaneous Considerations), which would permit access to inspect facilities during normal business hours that are agreeable to both parties.

Since our meeting, the City also received the latest test results for the sewer discharge grab sample conducted February 20, 2019 from the Meriwether County Water and Sewerage Authority. I have attached the laboratory report for this grab sample issued March 7, 2019. Based upon the City's Sewer Use Ordinance in force at the time of testing, the report shows two violations related to Ammonia and TKN as highlighted in yellow. I have not assigned any administrative fines to this report as it was our understanding the Authority would be drafting and sending a letter to the City specifically addressing the fines levied to date.

Lastly, I previously communicated with you the City's intent to make one tweak to the local pollutant limitations. The City Council acted and approved the amendment on March 4, 2019. A copy of Ordinance 19-0304 is attached.

Should you have any questions or concerns, please do not hesitate to contact me at (706) 637-8629 or david.milliron@cityofhogansville.org.

Sincerely,

A handwritten signature in black ink, appearing to be 'D. Milliron', written over the word 'Sincerely,'.

David A. Milliron
City Manager

/attachments

COPY
original hand delivered
3-6-19
fm

Invoice No. **WW Violations**

CITY OF HOGANSVILLE

INVOICE

Customer

Name Meriwether Water & Sewerage Authority
Address 17234 Roosevelt Highway, Building B
City Greenville State GA ZIP 30222
Phone _____

Misc

Date 3/6/2019
Order No. _____
Rep _____
FOB _____

Qty	Description	Unit Price	TOTAL
1	12/5/2018 & 12/12/2018 Violation Exceeding effluent limitations of Ammonia & Total Kjeldahl Nitrogen	\$ 5,000.00	\$ 5,000.00
1	12/19/2018 Violation Exceeding effluent limitations of Ammonia & Total Kjeldahl Nitrogen	\$ 2,500.00	\$ 2,500.00
1	01/08/2019 Violation Exceeding effluent limitations of Ammonia & Total Kjeldahl Nitrogen & BOD-5	\$ 7,500.00	\$ 7,500.00
1	02/07/2019 Violation Exceeding effluent limitations of Ammonia & Total Kjeldahl Nitrogen & BOD-5	\$ 7,500.00	\$ 7,500.00
		SubTotal	\$ 22,500.00
		Shipping	
		TOTAL	\$ 22,500.00

Payment

Select One...

Tax Rate(s)

Comments

Name

CC #

Expires

Office Use Only

CITY OF HOGANSVILLE, 400 EAST MAIN STREET, HOGANSVILLE GA. 30230

THANK YOU !

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

Friday, April 5, 2019

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

Dear Chairman Stephens:

This is a gentle reminder that the City has received no follow-up to our joint meeting held on March 6, 2019. Our next City Council meeting is scheduled for April 15th and I would like to brief my Board at that time.

Also, if you would be so kind as to acknowledge the City's request of March 15, 2019 for a myriad of documents and let me know the status of that effort and when I can expect receipt.

I am also reminded that our Waste Water Superintendent has not yet been given access to the master meter located inside the limited access fenced area at the MCWSA pump station. Such access is necessary so the City can adhere to its responsibility of annual calibration of the master meter.

Finally, attached is the latest test results for the sewer discharge grab sample conducted March 6, 2019 from the Meriwether County Water and Sewerage Authority. The laboratory report for this grab sample was issued March 22, 2019. Based upon the City's Sewer Use Ordinance in force at the time of testing, the report shows two violations related to Ammonia and TKN as highlighted in yellow. I have not assigned any administrative fines to this report as it was our understanding the Authority would be drafting and sending a letter to the City specifically addressing the fines levied to date; the Mayor and I are awaiting said correspondence.

Should you have any questions or concerns, please do not hesitate to contact me at (706) 637-8629 or david.milliron@cityofhogansville.org.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Milliron", is written over the word "Sincerely,".

David A. Milliron
City Manager

/attachments

David Milliron | Hogansville City Manager

From: David Milliron | Hogansville City Manager <david.milliron@cityofhogansville.org>
Sent: Monday, June 17, 2019 4:19 PM
To: 'James Stephens'
Cc: 'Allyson Stephens'; 'Bill Gregory'; 'Bob Trammell'; 'Christopher Poje'; 'Doris'; 'Larry S. Dunaway'; 'Pedro Rossello'; 'Rick Jeffares'; 'Tommy Arnold'; 'jcstephens@windstream.net'; 'jcstephens@hughes.net'; 't.gay@meriwethercountyga.gov'; 'udderspecialist@aol.com'; 'wvp@cityofhogansville.org'
Subject: RE: Follow-up to March 6, 2019 MCWSA Meeting
Importance: High

Mr. Stephens: It has been three months since our meeting and the City has not received any of the requested documents you agreed to provide. Furthermore, the City has continued to receive septic sewage from the Meriwether County Water and Sewerage Authority that is well outside the thresholds of the Sewer Use Ordinance. The MCWSA has now **KILLED** our plant!

On Monday, June 10th, the MCWSA pumped 19,600 gallons to the City of Hogansville.

On Tuesday, June 11th, the MCWSA pumped 58,100 gallons to the City.

On Wednesday, June 12th, the MCWSA pumped 50,100 to the City.

On Thursday, June 13th, the MCWSA pumped 23,300 gallons to the City.

By Friday, June 14th, the microorganisms in both SBR-1 and SBR-2 were **DEAD**! With the high volumes of septic sewage coming into the plant from Meriwether County, the microorganisms can not survive. This is not the first time this has happened; it began almost from the start after the City started receiving sewage from Meriwether County. So over four days we received 151,100 gallons of septic sewage and our Wastewater Plant cannot handle this level of shock from such a huge amount of septic sewage. This will put us out of compliance with the Georgia EPD, will require us to report such to the EPD, and most likely the City will be fined by the EPD. This is not the cooperative partnership our City signed up for when it engaged in an initiative to accept sewerage from the MCWSA.

Sir, cooperation is a two-way street and here it has been three months and we haven't received an action plan. And yet again, the MCWSA has killed our plant. So, in consultation with the Mayor, we are of the opinion the most appropriate action is to close access to our system until our plant is operational again and we meet to receive the requested action plan and requested documents. Please let me know when you can meet this week. I will bring with us reports from the past three months that document the noncompliance of our sewerage ordinance.

Thanks,

David

cc: Hogansville Mayor & Council, Georgia Environmental Protection Division

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

Wednesday, July 17, 2017

James C. Stephens
Meriwether County Water & Sewerage Authority
17234 Roosevelt Hwy, Bldg B
Greenville, GA 30222

Re: Waste Management – Response to April 11, 2019 Correspondence

Dear James,

I previously acknowledged receipt of your prior correspondence but wanted to follow up with a resolution. During Monday night's City Council meeting, your request to have the City abate the administrative fines levied against the MWCWSA was discussed in detail. Please know that after careful consideration, the Council has chosen not to waive any of the administrative fines. What weighed heavily in the decision was the August 2011 intergovernmental agreement, specifically Article IX that requires the MCWSA to pretreat Leachate to domestic waste strength prior submitting it to our collections system.

Furthermore, the Council has requested staff to review and assess penalties for all violations in which there has been no administrative action taken as of this date by staff. This is so that Hogansville can begin to recoup costs for treating septic sewerage that killed the micro-organisms in our plant and led Hogansville to be out of compliance with its EPD permit.

Lastly, the Council requested staff to step up its testing, which will occur weekly moving forward. I will keep you informed of the outcome of those test results as they are made available to me.

Sincerely,

A handwritten signature in blue ink, appearing to be 'DM', is written over a blue horizontal line.

David A. Milliron
City Manager

cc: Mayor & Council



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

March 07, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 2/20/2019

Type Sample: Wastewater

LAB NUMBER: 117152

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 2/20/2019 @ 0830, 0835, 0840, 0845

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	240	5	mg/L as CaCO30		2/27/2019 0920	
SM 4500-NH3 H	Ammonia As N	20 mg/L. 360	5.0	mg/L		2/21/2019 1302	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	250 mg/L. 247	68	mg/L		2/20/2019 1238	JC/GS
EPA 1664B	Oil & Grease, Total HEM	100 mg/L. 18.4	1.3	mg/L		2/28/2019 1510	GS
SM 4500-H+ B	pH	Normal Domestic Range (6.5 - 8.5) 7.54	NA	S.U.	H	2/20/2019 1632	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	20 mg/L. 318	6.25	mg/L		2/22/2019 1443	JC
SM 4500-P H	Total Phosphorus (P)	10 mg/L. 6.06	0.05	mg/L		2/27/2019 1224	JC

Notes:

1. Limits established by the City's "Sewer Use Ordinance" shown in "Red".
2. Violations of the City's "Sewer Use Ordinance" highlighted in "Yellow".

QUALITY ASSURANCE,

John K. Cooper

RESPECTFULLY SUBMITTED,

Janet Avery



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.
- O - Subcontract Lab NELAP 460181

2/20/2019
1/1

Page 1 of 1

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19-0304

AN ORDINANCE

AN ORDINANCE OF THE MAYOR AND COUNCIL OF THE CITY OF HOGANSVILLE TO AMEND THE CODE OF THE CITY; TO AMEND ARTICLE IV OF CHAPTER 98 REGARDING USE OF THE CITY WASTEWATER SYSTEM IN ORDER TO MODIFY THE LOCAL POLLUTANT LIMITATIONS TO INCLUDE CERTAIN LEVELS OF PHOSPHOROUS; TO REPEAL CONFLICTING ORDINANCES; TO FIX AN EFFECTIVE DATE; AND FOR OTHER PURPOSES.

THE COUNCIL OF THE CITY OF HOGANSVILLE HEREBY ORDAINS:

SECTION 1:

That the Code of the City of Hogansville be amended by deleting therefrom subsection (e) of Sec. 98-115, in its entirety, inserting in lieu thereof a new Sec. 98-115(e) to read as follows:

"(e) Local Pollutant Limitations

No Person shall discharge Wastewater containing concentrations, referred to as Local Pollutant Limitations, in excess of:

20 mg/L	ammonia nitrogen
2.1 mg/L	arsenic
1.2 mg/L	cadmium
4.5 mg/L	copper
1.75 mg/L	cyanide
100 mg/L	total fats, oils or grease (FOG)
0.60 mg/L	lead
0.02 mg/L	mercury
4.1 mg/L	nickel
1.0 mg/L	phenol
10.0 mg/L	phosphorous
1.2 mg/L	silver
20 mg/L	total Kjeldahl nitrogen
7.0 mg/L	total chromium
4.2 mg/L	zinc

The above limits apply at the point where the Wastewater is discharged to the POTW. All concentrations for metallic substances are for total metal unless indicated otherwise. The Control Authority may impose mass limitations in addition to the concentration-based limitations above."

SECTION 2:

All ordinances or parts of ordinances in conflict with the provisions of this ordinance shall be and the same are hereby repealed.

SECTION 3:

This ordinance, after adoption by the Council and upon approval by the Mayor, shall become effective immediately.

INTRODUCED AND FIRST READING February 18, 2019

SECOND READING ADOPTED/REJECTED March 4, 2019

SUBMITTED TO MAYOR AND APPROVED/DISAPPROVED Approved

BY: [Signature]
Mayor

ATTEST: [Signature]
Clerk

TTGVL
Amended
3/4/2019
VLC010701



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

March 22, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 3/6/2019

Type Sample: Wastewater

LAB NUMBER: 117345

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 3/6/2019 @ 0730, 0735, 0740, 0745

Analytical Method	Analyte	Detection Result	Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	184	5	mg/L as CaCO ₃		3/15/2019 0911	
SM 4500-NH ₃ H	Ammonia As N	20 mg/L. 268	5.0	mg/L		3/8/2019 1431	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	250 mg/L. 199	41	mg/L	H, Q	3/11/2019 1431	JC/KC
EPA 1664B	Oil & Grease, Total HEM	100 mg/L. 12.4	1.3	mg/L		3/14/2019 1320	GS
SM 4500-H+ B	pH	Normal Domestic Range (6.5 - 8.5) 7.77	NA	S.U.	H	3/7/2019 1605	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	20 mg/L. 292	6.25	mg/L		3/11/2019 1720	JC
SM 4500-P H	Total Phosphorus (P)	10 mg/L. 3.87	0.025	mg/L		3/7/2019 1352	JC

Notes:

1. Limits established by City's "Sewer Use Ordinance" shown in "RED".
2. Violations of the City's "Sewer Use Ordinance" highlighted in "YELLOW".

QUALITY ASSURANCE,

John K. Cooper

RESPECTFULLY SUBMITTED,

Janet Swartz



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.

BODs reanalyzed due to complete oxygen depletion in original batch.

Flagging Criteria

Q - In our review of the data, a QC deficiency was observed and flagged.

H - Sample analyzed outside of recommended hold time.

O - Subcontract Lab NELAP 460181

3/6/2019
1/3



Environmental Labs & Services, Inc.
103 Carroll Circle Carrollton, GA 30117
770-832-2371 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: <u>City of Hogansville</u>				Report To:				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.							
Address: <u>400 East Main Hogansville, GA.</u>				Copy To:											
E-mail: <u>WWP@cityofhogansville.org</u>				Purchase Order #:											
Phone: <u>706 637 6675</u> Cell: <u>706 977 6856</u>				Quote #:											
Requested TAT:				ANALYSIS REQUESTED				(Gray for Lab use Only)							
Sample Identification	Matrix Code	Grab	Composite	Composite Start	Composite End / Grab	# of Containers	Preservation	To Be Filtered: Y/N	Holdable	BOD	PH	NH3, TKN	Total P	OTG	ELS LAB NUMBER
Acidity (1)	WW	X		3-6-19 7:30 AM		1			✓						117345 - 1
BOD, PH (2)	WW	X		3-6-19 7:35 AM		1			✓	✓					-2
Ammonia, TKN (3)	WW	X		3-6-19 7:40 AM		1						✓	✓		-3
total P															
OTG (4)	NW	X		3-6-19 7:45 AM		1							✓		-4
SAMPLED BY: <u>Mark Hammond</u>				DATE/TIME: <u>3-6-19 7:50 AM</u>		RELINQUISHED BY: <u>Paul G. Williams</u>		DATE/TIME: <u>3-6-19 7:50 AM</u>		CUSTODY SEALED COOLER: <u>(Y) N</u>		COMMENTS: <u>3/6/19 BOD, PH</u> <u>(BOD)</u>			
RECEIVED BY: <u>Paul G. Williams</u>				DATE/TIME: <u>3-6-19 7:50 AM</u>		RELINQUISHED BY: <u>Paul G. Williams</u>		DATE/TIME: <u>03/06/19</u>		RECEIVED ON ICE: <u>(Y) N</u>					
RECEIVED BY: <u>Paul G. Williams</u>				DATE/TIME: <u>3-6-19 7:50 AM</u>		RELINQUISHED BY: <u>Paul G. Williams</u>		DATE/TIME: <u>03/06/19</u>		SAMPLES INTACT: <u>(Y) N</u>					
RECEIVED BY LAB: <u>Paul G. Williams</u>				DATE/TIME: <u>3-6-19 7:50 AM</u>		RELINQUISHED BY: <u>Paul G. Williams</u>		DATE/TIME: <u>03/06/19</u>		SAMPLES INTACT: <u>(Y) N</u>					
ENTERED INTO DATABASE: <u>(Y) N</u>				COG (REV) (Y) N		AIR DILU		COOLERS		TEMPERATURE: <u>68.5 F</u>					

*Matrix 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
*Preservation Codes: H = Hydrochloric Acid N = Nitric Acid S = Sulfuric Acid X = Sodium Hydroxide I = Ice Only O = Other NA = None

3/6/2019
2/3

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

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Hagermanville

ELS Lab #: 117345

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

Cooler 1 Temp: 5°C °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"/>				
Custody seals present on sample containers?			<input checked="" type="checkbox"/>		
Custody seals intact on sample containers?			<input checked="" type="checkbox"/>		
Do sample container labels match the COC?	<input checked="" 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"/>				
Were all of the samples listed on the COC received?	<input checked="" 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"/>				
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>				
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>				
Were VOA samples received without headspace (< 1/4" bubble)?			<input checked="" type="checkbox"/>		
Were trip blanks submitted?			<input checked="" type="checkbox"/>		

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

I certify that I have completed this form (date/initial): JB 3/6/19

3/6/2019
3/3



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

April 19, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 3/27/2019

Type Sample: Wastewater

LAB NUMBER: 117677

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 3/27/2019 @ 0740, 0750, 0800, 0810

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	183	5	mg/L as CaCO ₃		4/3/2019 1119	
SM 4500-NH ₃ H	Ammonia As N	20 mg/L 224	2.40	mg/L		4/1/2019 1206	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	250 mg/L 190	38	mg/L		3/27/2019 1455	GS
EPA 1664B	Oil & Grease, Total HEM	100 mg/L 15.6	1.3	mg/L		4/4/2019 1340	GS
SM 4500-H+ B	pH	Normal Domestic Range (6.5 - 8.5) 7.45	NA	S.U.	H	3/27/2019 1630	AC
SM 4500-Norg D	Total Kjeldahl Nitrogen	20 mg/L 265	6.25	mg/L		4/1/2019 1546	JC
SM 4500-P H	Total Phosphorus (P)	10 mg/L 7.38	0.05	mg/L		4/3/2019 1220	JC

NOTES:

1. Limits established by the City's "Sewer Use Ordinance" shown in "RED"
2. Violations of the City's "Sewer Use Ordinance" highlighted in "YELLOW"

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

James Ivey

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.
- O - Subcontract Lab NELAP 460181

3/27/2019
1/1

Page 1 of 1

James C. Stephens
17234 Roosevelt Hwy Bldg. B
Greenville, GA 30222
(706) 977-6981
sgtechservicesllc@gmail.com
04/10/2019

Mr. Milron
City Manager
City of Hogansville
400 E. Main Street
Hogansville, GA 30230

Dear Mr. Milron:

The Meriwether County Water & Sewerage Authority (MCWSA) is in receipt of your requests for payments for reported exceedances of the updated City of Hogansville Sewer Use Ordinance. Our Authority has reviewed the new ordinance and is in the process of implementing the changes necessary to comply with the limits outlined in the Ordinance. The MCWSA understands the need for the new parameters and agrees with the limits. The MCWSA, during our meeting held on April 4, 2019, requested that our Attorney draft the necessary formal request asking the Meriwether County Board of Commissioners to revise the County Sewer Use Ordinance to establish the same limits as the City of Hogansville. This will provide MCWSA the enforcement powers upon adoption and will allow us to regulate our sewer users to assure compliance.

We understand that the City of Hogansville has an operating permit issued by the Georgia Environmental Protection Division for limits of discharge from the treatment facility that you own and operate. We also understand the importance of meeting the limits of this issued permit. We do however take exception to the levied fines and penalties being assessed from your office based on the new ordinance at this current time. MCWSA has the obligation to comply with the new Ordinance as issued by the City of Hogansville and has every intent to do so. What we take exception to is the timeline in which these issued fines and penalties are being levied against us. We have, as communicated in our most recent meeting of March 6th, 2019, decline to pay the currently issued fines and penalties. MCWSA is committed to bringing all our current and future customers into full compliance with the requirements of the new City Sewer Use Ordinance. It is our goal to have users within our system permitted by the Georgia Environmental Protection Division for Industrial Sewer Discharge based on the new limits as outlined in the City of Hogansville Sewer Use Ordinance. Our timeline on this process will meet the permit requirements of the City of Hogansville's obligations for the new facility upon completion and certification of operation by the

Mr. Milron
04/10/2019
Page 2

Georgia Environmental Protection Division. It is our understanding this is roughly within the first Quarter of 2020.

Additional correspondences regarding our calendar of implementation as well as providing the requested information from our industrial partners will follow under separate submissions to your office. With our sewer agreement in place, we consider MCWSA to be a partner with the City of Hogansville and are diligently working to lessen the burdens on the treatment facility and coming into compliance with the Sewer Use Ordinance. Considering these facts MCWSA request that all previously issued fines and penalties be rescinded with an understanding that the MCWSA is actively working under the guidelines and restrictions of the new Ordinance to bring all contributors into full compliance. It needs to be recognized that the Georgia Environmental Protection Division has been and is continuing to assist us in bringing all of our sewer users in compliance with your newly established sewer use ordinance.

It is our intent as partners in the facility to do our part to help the City of Hogansville meet or exceed the treatment requirements as outlined in the operating permit for the facility, post renovation and commissioning. We are and will continue to actively engage our industrial and commercial partners to make this a reality. The MCWSA intends to be a partner in the operations as outlined in our mutual agreements and understands the importance of these issued restrictions on discharges to the sewer collection system.

Considering these facts, we are asking for the City's consideration in removing the current penalties and interest levied against the MCWSA, and allowing a reasonable time line for compliance as outlined above.

Thank you for the City's consideration in this matter. Please keep us informed on the progress of the facility and how we may assist in the process.

Sincerely,

James C. Stephens

Chairman

Meriwether County Water & Sewerage Authority



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

May 02, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 4/10/2019

Type Sample: Wastewater

LAB NUMBER: 117898

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 4/10/2019 @ 0815, 0820, 0825, 0830

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	161	10	mg/L as CaCO ₃		4/19/2019 0925	JL
SM 4500-NH ₃ H	Ammonia As N	425	5.0	mg/L		4/12/2019 1135	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	264	64	mg/L		4/10/2019 1430	GS
EPA 1664B	Oil & Grease, Total HEM	18.5	1.3	mg/L		4/22/2019 0915	GS
SM 4500-H+ B	pH	7.84	NA	S.U.	H	4/10/2019 1020	DW
SM 4500-Norg D	Total Kjeldahl Nitrogen	495	6.25	mg/L		4/15/2019 1512	JC
SM 4500-P H	Total Phosphorus (P)	1.43	0.025	mg/L		4/15/2019 1232	JC

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

James L. Ingers

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.

4/10/2019
1/3



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: <u>City of Hohenville</u>				Report To:				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.															
Address: <u>400 East Main Hohenville, GA 30230</u>				Copy To:																			
E-mail: <u>WWP@cityofhohenville.org</u>				Purchase Order #:																			
Phone: <u>706 637 6675</u> Cell: <u>706 977 6856</u>				Quote #:																			
Requested TAT:																							
Sample Identification				Matrix Code ¹	Grab	Composite	Composite Start Date	Composite Start Time	Composite End Date	Composite End Time	# of Containers	Preservation ²	To Be Filtered: Y / N	ANALYSIS REQUESTED				(Gray for Lab use Only)					
BOD, PH (1)				WW	X		4-10-19	8:15 AM			1	I		✓	BOD, PH	Heidi Vel	WHS, TKN	107 P	04G		ELS LAB NUMBER: <u>117848-1</u>		
Acidity (2)				WW	X		4-10-19	8:20 AM			1	I		✓							-2		
Ammonia, TKN				WW	X		4-10-19	8:25 AM			1	S				✓	✓				-3		
Total P (3)				WW	X																		
O & G (4)				WW	X		4-10-19	8:30 AM			1	S					✓				-4		
SAMPLED BY: <u>Mark Hammond</u>				DATE/TIME: <u>4-10-19 8:15 AM</u>		RELINQUISHED BY: <u>Mark Hammond</u>		DATE/TIME: <u>4-10-19 8:35 AM</u>		CUSTODY SEALED COOLER: <u>Y / N</u>		COMMENTS: <u>92</u> <u>4-10-19</u>											
RECEIVED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-10-19 8:35 AM</u>		RELINQUISHED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-10-19 09:55</u>		RECEIVED ON ICE: <u>Y / N</u>															
RECEIVED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-10-19 09:55</u>		RELINQUISHED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-10-19 09:55</u>		SAMPLES INTACT: <u>Y / N</u>															
RECEIVED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-10-19 09:55</u>		RELINQUISHED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-10-19 09:55</u>		SAMPLES INTACT: <u>Y / N</u>															
SAMPLE SHIPPED VIA: <u>UPS</u>				FED-EX				USPS				COURIER				CLIENT				OTHER:			
AIR BILL#				COOLER#				TEMPERATURE: <u>10°C</u>															

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

4/10/2019
2/3

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

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Normansville

ELS Lab #: 117898

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

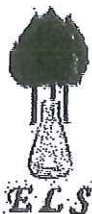
Cooler 1 Temp: 10 °C Cooler 2 Temp: _____ °C Cooler 3 Temp: _____ °C Cooler 4: _____ °C Cooler 5: _____ °C

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

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

I certify that I have completed this form (date/initial): 4/10/19 *OC*

4/10/2019
3/3



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

May 23, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 4/24/2019

Type Sample: Wastewater

LAB NUMBER: 118055

Sample Description

MERIWETHER CO. GA - EFFLUENT - GRAB 4/24/2019 @ 0815, 0820, 0825, 0830

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	121	5	mg/L as CaCO3		5/3/2019 0942	
SM 4500-NH3 H	Ammonia As N	205	2.40	mg/L		4/25/2019 1427	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	106	27	mg/L		4/25/2019 1038	JC/GS
EPA 1664B	Oil & Grease, Total HEM	24.0	1.4	mg/L		5/10/2019 1000	GS
SM 4500-Norg D	Total Kjeldahl Nitrogen	189	3.10	mg/L		4/25/2019 1537	GS
SM 4500-P H	Total Phosphorus (P)	3.74	0.025	mg/L		4/30/2019 1135	JC

QUALITY ASSURANCE,

John K. Cooper

RESPECTFULLY SUBMITTED,

James L. Swartz



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

0 - Subcontract Lab NELAP 460181

4/24/2019
1/3



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: <u>CITY OF HOGANSVILLE</u>		Report To:																					
Address: <u>400 East Main Hogansville, GA.</u>		Copy To:																					
30230		Purchase Order #:																					
E-mail: <u>WWP@cityofhogansville.org</u>		Quote #:																					
Phone: <u>706 977 6856</u> Cell:																							
Requested TAT:																							
		ANALYSIS REQUESTED										(Gray for Lab use Only)											
												ELS LAB NUMBER											
Sample Identification		Matrix Code ¹	Grab	Composite	Composite Start		Composite End / Grab		# of Containers	Preservation ²	To Be Filtered: Y / N												
					Date	Time	Date	Time															
Bed, PH (1)		WW	X		4-24-19	8:15AM																118035-1	
Acidity (2)		WW	X		4-24-19	8:20AM																-2	
Ammonia, TKN		WW	X		4-24-19	8:25AM																-3	
Total P (3)																						-3	
O & B (4)		WW	X		4-24-19	8:30AM																-4	
SAMPLED BY: <u>Mark Hammond</u>		DATE/TIME: <u>4-24-19 8:15AM</u>		RELINQUISHED BY: <u>Mark Hammond</u>		DATE/TIME: <u>4-24-19 8:30AM</u>		CUSTODY SEALED COOLER: <u>Y/N</u>												COMMENTS:			
RECEIVED BY: <u>Paul Williams</u>		DATE/TIME: <u>4-24-19 8:30AM</u>		RELINQUISHED BY: <u>Paul Williams</u>		DATE/TIME:		RECEIVED ON ICE: <u>Y/N</u>															
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		SAMPLES INTACT: <u>Y/N</u>															
RECEIVED BY LAB: <u>Environmental Labs & Services Inc.</u>		DATE/TIME: <u>4-24-19 8:30AM</u>		SAMPLE SHIPPED VIA: <u>UPS</u> <u>FED-EX</u> <u>USPS</u> <u>COURIER</u> <u>(CLIENT)</u> <u>ELS</u> <u>OTHER:</u>																			
ENTERED INTO DATABASE: <u>(initials)</u>		COC REVIEWED: <u>(initials)</u>		AIR BILL#		COOLER#		TEMPERATURE: <u>DC</u>															

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

4/24/2019
2/3

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

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Hogganville

ELS Lab #: 118085

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

Cooler 1 Temp: 10°C °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"/>				
Custody seals present on sample containers?	<input checked="" type="checkbox"/>				
Custody seals intact on sample containers?	<input checked="" type="checkbox"/>				
Do sample container labels match the COC?	<input checked="" 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"/>				
Were all of the samples listed on the COC received?	<input checked="" 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"/>				
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>				
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>				
Were VOA samples received without headspace (< 1/4" bubble)?	<input checked="" type="checkbox"/>				
Were trip blanks submitted?	<input checked="" type="checkbox"/>				

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

I certify that I have completed this form (date/initial):

985 4-24-19

4/24/2019
3/3



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

May 23, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 5/8/2019

Type Sample: Wastewater

LAB NUMBER: 118227

Sample Description

MERIWETHER CO. GA - EFFLUENT - GRAB 5/8/2019 @ 0720, 0725, 0730, 0735

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	135	5	mg/L as CaCO30		5/17/2019 0924	
SM 4500-NH3 H	Ammonia As N	232	2.4	mg/L		5/13/2019 1221	GS
SM 5210B	Biochemical Oxygen Demand (BOD-5)	86	27	mg/L		5/8/2019 1534	JC
EPA 1664B	Oil & Grease, Total HEM	26.2	1.8	mg/L		5/17/2019 0925	GS
SM 4500-H+ B	pH	7.85	NA	S.U.	H	5/8/2019 1538	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	245	3.12	mg/L		5/15/2019 1531	GS
SM 4500-P H	Total Phosphorus (P)	3.15	0.025	mg/L		5/15/2019 1414	GS

QUALITY ASSURANCE,



RESPECTFULLY SUBMITTED,

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

5/8/2019
1/3

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

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[illegible]

5/8/2019
2/3

Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Knoxville

ELS Lab #: 118237

	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"/>		
Were all samples received within holding time?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<i>not out</i>	
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: 9 °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): 5/8/19 OK

5/8/2019
3/3



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

June 14, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 5/29/2019

Type Sample: Wastewater

LAB NUMBER: 118465

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 5/29/2019 @ 0800, 0805, 0810, 0815

Analytical Method	Analyte	Detection		Units	Flag	Analyzed	By
		Result	Limit				
SM 2310B	General Chemistry Acidity	212	5	mg/L as CaCO ₃		6/11/2019 1125	
SM 4500-NH ₃ H	Ammonia As N	186	2.40	mg/L		5/29/2019 1616	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	102	29	mg/L		5/30/2019 1143	GS/JC
EPA 1664B	Oil & Grease, Total HEM	124	1.3	mg/L		6/7/2019 1130	GS
SM 4500-H ⁺ B	pH	7.08	NA	S.U.		5/29/2019 1030	DW
SM 4500-Norg D	Total Kjeldahl Nitrogen	234	3.12	mg/L		6/3/2019 1730	JC
SM 4500-P H	Total Phosphorus (P)	8.55	0.125	mg/L		6/6/2019 1442	GS
SM 2540 D	Total Suspended Solids	108	50	mg/L		5/29/2019 1610	GS

QUALITY ASSURANCE,



RESPECTFULLY SUBMITTED,

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

0 - Subcontract Lab NELAP 460181

5/29/2019
1/3

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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: <u>City of Hogansville</u>				Report To:				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.													
Address: <u>400 East Main Hogansville, GA 30230</u>				Copy To:																	
E-mail: <u>WNP@cityofhogansville.org</u>				Purchase Order #:																	
Phone: <u>706 977 6856</u> Cell:				Quote #:																	
Requested TAT:																					
Sample Identification	Matrix Code ¹	Grab	Composite	Composite Start		Composite End / Grab		# of Containers	Preservation ²	To Be Filtered: Y / N	ANALYSIS REQUESTED										ELS LAB NUMBER
				Date	Time	Date	Time				BOD PH	Acidity	NH3 TKN	Total P	O & G						
BOD, PH (1)	WW	X		5-29-19	8:00am																118765-1
Acidity (2)	WW	X		5-29-19	8:05am																-2
NH3, TKN	WW	X		5-29-19	8:10am																-3
Total P (3)	WW																				
O & G (4)	WW	X		5-29-19	8:15am																-4
SAMPLED BY: <u>Mark Hammond</u>				DATE/TIME: <u>5-29-19 8:00am</u>		RELINQUISHED BY: <u>Mark Hammond</u>				DATE/TIME: <u>5-29-19 8:20am</u>		CUSTODY SEALED COOLER: <u>Y (N)</u>				COMMENTS:					
RECEIVED BY: <u>Joe Cummings</u>				DATE/TIME: <u>5-29-19 8:20am</u>		RELINQUISHED BY: <u>Joe Cummings</u>				DATE/TIME: <u>5/29/19 0945</u>		RECEIVED ON ICE: <u>Y (N)</u>									
RECEIVED BY: <u>Joe Cummings</u>				DATE/TIME: <u>5/29/19 0945</u>		RELINQUISHED BY: <u>Joe Cummings</u>				DATE/TIME: <u>5/29/19 0945</u>		SAMPLES INTACT: <u>Y (N)</u>									
RECEIVED BY: <u>Joe Cummings</u>				DATE/TIME: <u>5/29/19 0945</u>		RELINQUISHED BY: <u>Joe Cummings</u>				DATE/TIME: <u>5/29/19 0945</u>		SAMPLES INTACT: <u>Y (N)</u>									
ENTERED INTO LAB: <u>Joe Cummings</u>				DATE/TIME: <u>5/29/19 0945</u>		SAMPLE SHIPPED VIA: <u>UPS</u> <u>FED EX</u> <u>USPS</u> <u>CARRIER</u> <u>CLIENT</u> <u>OTHER</u>				COOLER: <u>Y (N)</u>		TEMPERATURE: <u>12°C</u>									

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

5/29/2019
2/3

Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Wagonville

ELS Lab #: 118965

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

Cooler 1 Temp: 12 °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"/>				
Custody seals present on sample containers?		<input checked="" type="checkbox"/>			
Custody seals intact on sample containers?		<input checked="" type="checkbox"/>			
Do sample container labels match the COC?	<input checked="" 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"/>				
Were all of the samples listed on the COC received?	<input checked="" 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"/>				
Did we receive sufficient sample volume for indicated analyses?	<input checked="" type="checkbox"/>				
Were samples received in appropriate containers?	<input checked="" type="checkbox"/>				
Were VOA samples received without headspace (< 1/4" bubble)?			<input checked="" type="checkbox"/>		
Were trip blanks submitted?		<input checked="" type="checkbox"/>			

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

I certify that I have completed this form (date/initial): 5/29/19 *ae*

5/29/2019
3/3



Environmental Labs & Services, Inc.

www.els-inc.net

Laboratory Report

June 23, 2019

CITY OF HOGANSVILLE
400 East Main St.
Hogansville, GA 30230
Attention: MARK HAMMOND

Date Received: 6/4/2019
Type Sample: Wastewater
LAB NUMBER: 118577

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 6/4/2019 @ 0835, 0840, 0845, 0850

Analytical Method	Analyte	Detection		Units	Flag	Analyzed	By
		Result	Limit				
SM 2310B	General Chemistry Acidity	139	5	mg/L as CaCO30		6/13/2019 1015	
SM 4500-NH3 H	Ammonia As N	355	4.80	mg/L		6/8/2019 1620	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	96	40	mg/L		6/4/2019 1645	GS/KC
EPA 1664B	Oil & Grease, Total HEM	9.7	1.3	mg/L		6/12/2019 1440	GS
SM 4500-H+ B	pH	7.77	NA	S.U.	H	6/4/2019 1802	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	312	3.12	mg/L		6/12/2019 1454	GS
SM 4500-P H	Total Phosphorus (P)	6.45	0.125	mg/L		6/6/2019 1459	GS

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

James Ivey

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

6/4/2019
1/1

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Laboratory Report

August 01, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 7/9/2019

Type Sample: Wastewater

LAB NUMBER: 119094

Sample Description

MERIWETHER CO. GA - EFFLUENT - GRAB 7/9/2019 @ 0735, 0735, 0740, 0745

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
	General Chemistry						
SM 2310B	Acidity	219	5	mg/L as CaCO ₃		7/16/2019 0936	
SM 4500-NH ₃ H	Ammonia As N	247	4.8	mg/L		7/11/2019 1647	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	152	47	mg/L		7/9/2019 1436	JC/GS
EPA 1664B	Oil & Grease, Total HEM	5.8	1.3	mg/L		7/20/2019 1800	GS
SM 4500-H ⁺ B	pH	7.52	NA	S.U.	H	7/9/2019 1735	KC
SM 4500-Norg D	Total Kjeldahl Nitrogen	282	5.0	mg/L		7/11/2019 1507	JC
SM 4500-P H	Total Phosphorus (P)	1.77	0.025	mg/L		7/11/2019 1226	JC

7/9/2019
1/4

LAB NUMBER: 119094

Sample Description

CITY OF HOGANSVILLE

MERIWETHER CO. GA - EFFLUENT - GRAB 7/9/2019 @ 0735, 0735, 0740, 0745

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

Janet Ivey

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

7/9/2019
2/4

Client Name: City of Hoggansville	Report To:
Address: 400 East Main, Hoggansville, Ga. 30230	Copy To:
	Purchase Order #:
E-mail: WWP@cityofhoggansville.org	Quote #:
Phone: 706 977 6856	
Cell:	

[illegible]

SAMPLED BY: MARK Hammond	DATE/TIME: 7-9-19 7:30 AM	RELINQUISHED BY: [Signature]	DATE/TIME: 7-9-19 7:50 AM	CUSTODY SEALED COOLER: Y N	7-9-19 (B-5)	COMMENTS:
RECEIVED BY: Lane Cummings	DATE/TIME: 7-9-19 7:50 AM	RELINQUISHED BY: [Signature]	DATE/TIME: 7-9-19 0905	RECEIVED ON ICE: Y N		
RECEIVED BY: [Signature]	DATE/TIME: [Blank]	RELINQUISHED BY: [Signature]	DATE/TIME: [Blank]	SAMPLES INTACT: Y N		
RECEIVED BY ELA: [Signature]	DATE/TIME: 7-9-19 1905	SAMPLE SHIPPED VIA: UPS FED-EX USPS COURIER	CLIENT: [Blank] ELS	OTHER: [Blank]		
BUCKETED INTO FRIGS: [Signature]	COG REVIEWER: [Signature]	AIR BILL#	COOLER#	TEMPERATURE: 14		

Matrix 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
Preservation Codes: H = Hydrochloric Acid N = Nitric Acid S = Sulfuric Acid X = Sodium Hydroxide Ice Only O = Other NA = None

Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/24/17

Client Name: City of Westerville ELS Lab #: 119994

	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"/>		
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 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): 11/19/17

Laboratory Report

August 15, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 7/23/2019

Type Sample: Wastewater

LAB NUMBER: 119258

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 7/23/2019 @ 0800, 0810, 0820, 0830

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
SM 2310B	General Chemistry Acidity	156	5	mg/L as CaCO ₃		8/1/2019 0920	
SM 4500-NH ₃ H	Ammonia As N	252	4.0	mg/L		7/24/2019 1635	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	198	42	mg/L		7/23/2019 1249	JC/JI
EPA 1664B	Oil & Grease, Total HEM	BDL	4.4	mg/L		7/25/2019 1545	GS
SM 4500-H+ B	pH	7.70	NA	S.U.		7/23/2019 1015	AC
SM 4500-Norg D	Total Kjeldahl Nitrogen	332	6.25	mg/L		7/24/2019 1446	JC
SM 4500-P H	Total Phosphorus (P)	5.14	0.05	mg/L		7/24/2019 1313	JC

7/23/2019

1/4

LAB NUMBER: 119258

Sample Description

CITY OF HOGANSVILLE

MERIWETHER CO. GA - SEWAGE - GRAB 7/23/2019 @ 0800, 0810, 0820, 0830

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

Janet Ince

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

0 - Subcontract Lab NELAP 460181

7/23/2019
2/4



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

Client Name:	City of Hogansville	Report To:	
Address:	400 East Main, Hogansville, GA 30230	Copy To:	
E-mail:	WW@cityofhogansville.org	Purchase Order #:	
Phone:	706 977-6856	Quote #:	
Cell:	1		
Requested TAT:			

Requested TAT:										ANALYSIS REQUESTED												ELS LAB NUMBER		
Sample Identification	Matrix Code ¹	Grab	Composite	Composite Start		Composite End / Grab		# of Containers	Preservation ²	To Be Filtered: Y / N														
				Date	Time	Date	Time																	
Mariwate County Sewage	WW	X		7-23-19	8:00 AM			1	1															119258-1
Acidity # 2	WW	X		7-23-19	8:10 AM			1	1															-2
Ammonia, TKN # 3	WW	X		7-23-19	8:20 AM			1	1															-3
Total P																								1
O + G # 4	WW	X		7-23-19	8:30 AM			1	1															-4

SAMPLED BY:	Mark K. Hammond	DATE/TIME:	7-23-19 8:30 AM	RELINQUISHED BY:	Mark K. Hammond	DATE/TIME:	7-23-19 9:30 AM	CUSTODY SEALED COOLER: Y / N	Y / N
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		RECEIVED ON ICE: Y / N	Y / N
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		SAMPLES INTACT: Y / N	Y / N
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		OTHER:	
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		COOLER#	
RECEIVED BY:		DATE/TIME:		RELINQUISHED BY:		DATE/TIME:		TEMPERATURE:	40

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.

7/23/2019 3/4

Environmental Labs & Services, Inc.

SAMPLE/COOLER RECEIPT CHECKLIST

Revision 1.0
Effective Date: 5/30/17

Client Name: City of Morgansville

Comments

YES NO N/A

Shipping container / cooler received in good condition?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	damaged or 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"/>		
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

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"/>	samples received but not listed <input type="checkbox"/>	
Were all of the samples listed on the COC received?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<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"/>		

Comments

Details

YES NO N/A

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): 7/23/19 OC

7/23/2019 4/4

Laboratory Report

August 24, 2019

CITY OF HOGANSVILLE

400 East Main St.

Hogansville, GA 30230

Attention: MARK HAMMOND

Date Received: 8/6/2019

Type Sample: Wastewater

LAB NUMBER: 119458

Sample Description

MERIWETHER CO. GA - SEWAGE - GRAB 8/6/2019 @ 0800, 0805, 0810, 0815

Analytical Method	Analyte	Result	Detection Limit	Units	Flag	Analyzed	By
	General Chemistry						
SM 2310B	Acidity	166	5	mg/L as CaCO ₃		8/14/2019 0955	
SM 4500-NH ₃ H	Ammonia As N	305	5.00	mg/L		8/7/2019 1519	JC
SM 5210B	Biochemical Oxygen Demand (BOD-5)	54	44	mg/L		8/6/2019 1310	JC/JI
EPA 1664B	Oil & Grease, Total HEM	5.2	1.3	mg/L		8/16/2019 0915	GS
SM 4500-H+ B	pH	7.52	NA	S.U.		8/6/2019 1048	DW
SM 4500-Norg D	Total Kjeldahl Nitrogen	298	6.25	mg/L		8/7/2019 1629	JC
SM 4500-P H	Total Phosphorus (P)	8.34	0.050	mg/L		8/12/2019 1257	JC

8/6/2019
1/4

LAB NUMBER: 119458

Sample Description

CITY OF HOGANSVILLE

MERIWETHER CO. GA - SEWAGE - GRAB 8/6/2019 @ 0800, 0805, 0810, 0815

QUALITY ASSURANCE,

John K. Cooper



RESPECTFULLY SUBMITTED,

Janet Ivey

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

0 - Subcontract Lab NELAP 460181

8/6/2019
2/4

CHAIN-OF-CUSTODY RECORD

The Chain-of-Custody Record is a LEGAL DOCUMENT

COC001
REV 2.1
6/14/2018

Page: of

[illegible]

Matrix 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
Preservation 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 Hagerstown

ELS Lab #: 119058

	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"/>	cooling initiated <input type="checkbox"/>	
Cooler temperature within limits of 0-5°C? (see below)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input 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>Fitout</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: 5 °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"/>	
Was the sample collection date/time noted?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	samples listed but not received <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): 11/19/20

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

Wednesday, August 14, 2019

Whitney Fenwick
Industrial Permitting Unit, Acting Manager
2 Martin Luther King Jr. Drive
Suite 1152E
Atlanta, GA 30334

Dear Ms. Fenwick:

Thank you for speaking with Mayor Bill Stankiewicz and the other members of the City's team on our conference call of August 13, 2019. As we related on the telephone, we have been working with the Meriwether County Water and Sewer Authority, as well as Meriwether County, for nearly two years to solve the problem stemming from the wastewater Hogansville is receiving from the Meriwether collection system. As we explained on the telephone, we have reached the point at which we have no choice other than to provide Meriwether with a notice that we will cease accepting sewerage from its collection system within 60 days absent significant improvement and compliance with our EPD permit and intergovernmental agreement. Our hope, obviously, is that you and your team members at EPD could help bring the parties to the table to construct a solution to the problem.

We understand your position that self-reported flows from the landfill perhaps do not approach the levels of volume required for pre-treatment. However, we have provided and will continue to provide you with information that shows the flows we are receiving are far in excess of the minimum amounts being reported (and also, as you mentioned, we are often receiving in a "batch" discharge).

Moreover, the amount of flows aside, we think we have incontrovertible proof that the makeup of the flow also warrants pre-treatment.

As I stated, and as Mayor Stankiewicz reiterated, we would very much appreciate EPD's involvement in bringing the parties together to discuss what we think are common sense solutions. While we would rather not cut off the flow of the industrial park due to these repeated violations, we are at the point where the City has no choice.

Ms. Whitney Fenwick
2 Martin Luther King Jr. Drive
Suite 1152E
Atlanta, GA 30334
Page Two
August 14, 2019

If, after your internal discussions, you determine that EPD cannot assist, please let us know at the earliest opportunity.

Thank you for agreeing to send us a copy of the industrial user surveys you recently received from Meriwether County. As we understood it, Waste Management is reporting an average daily flow of 4,597 gallons. As we explained on the telephone, the information we have provided to you is in stark contrast to that self-reported flow. We also pointed out that aside from the flow requirements, pretreatment permits are required based on the following published EPD guideline: "Designated by the control authority based on reasonable potential for adversely affecting the POTW's operation or for violating a pretreatment standard."

In summary, while the City of Hogansville is of the opinion that the flows entering the Meriwether collection system from the landfill are sufficient in both volume and content to warrant pre-treatment, thus far (at least from what we hear from Meriwether County officials) EPD has determined that pre-treatment is not authorized. If that is your opinion after reviewing the information we provided, please confirm in writing and we will proceed with other avenues available to us.

Finally, I know you were going to discuss with your colleagues those options available to EPD at this point. As we are on the verge of notifying Meriwether County Water and Sewer Authority of our unwillingness to continue to accept sewerage under current conditions, we would appreciate your letting us know your department's decision as soon as such is available.

Thank you again for your cooperation and assistance.

We look forward to hearing from you.

Sincerely,

A handwritten signature in black ink, appearing to be 'DM', with a long horizontal line extending to the left.

David Milliron
City Manager
(706) 616-4284

cc: Mayor & Council

LEWIS, TAYLOR & TODD, P.C.
ATTORNEYS AT LAW
SUITE 3
205 NORTH LEWIS STREET
POST OFFICE DRAWER 1027
LAGRANGE, GEORGIA 30241

JOHN M. TAYLOR
JEFFREY M. TODD

JAMES R. LEWIS
(1928-1996)
GEORGE E. SIMS, JR.
(1917-1967)
FAX 706-882-4905
TELEPHONE 706-882-2501

August 27, 2019

VIA E-MAIL
bob@trammellfirm.com

Mr. Robert T. Trammell, Jr.
THE TRAMMELL FIRM, LLC
P. O. Box 109
Luthersville, Georgia 30251
bob@trammellfirm.com

**RE: Intergovernmental Agreement Regarding Construction of Wastewater
Treatment and Disposal Plant**

Dear Bob:

As we discussed over the telephone several weeks ago, the issues stemming from the sewer flows received by Hogansville from the Meriwether County Water & Sewer Authority ("Meriwether") have reached a critical juncture, and Hogansville is left with no option other than to take those actions necessary to protect its current and future water plants. Please be advised that Hogansville will cease accepting wastewater flows from Meriwether County Water and Sewer Authority 60 days from the date of this letter, and will not accept future flows unless and until Meriwether takes the steps necessary to bring said flows into compliance with the relevant agreements ("Agreements").

I will not include all of the detail available with regard to the violative nature of the flows at issue, as I am aware that Hogansville City Manager David Milliron has chronicled, in writing and otherwise, the manner in which flows have so often violated the Agreements. Further, it is my understanding that such violations are, on the whole, not subject to debate.

Broadly, Meriwether continues to introduce sewage into the system which violates a number of parameters established in the Agreements. Exhibit "A" discloses a number of instances in which the flows have far exceeded the maximum levels allowed for BOD and ammonia nitrogen concentrations. Although the testing dates are prior to Meriwether County's adoption of the upgraded ordinance, as to the BOD and ammonia nitrate levels such are often far in excess of the levels required in the current Meriwether ordinance.

LEWIS, TAYLOR & TODD, P.C.

ATTORNEYS AT LAW

Second, the Agreements require that leachate be pre-treated to domestic strength, which is obviously not occurring and which all agree is likely the driving force behind the problems.

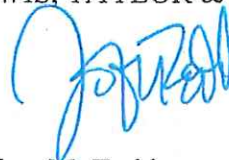
While I recognize that our clients have held a number of meetings and otherwise communicated regarding these issues for over a year and a half, the lack of progress, and the costs incurred by Hogansville as a result of the unacceptable flows, leave the City with no choice but to cease accepting wastewater flow in 60 days absent Meriwether taking those actions necessary to comply with its obligations under the Agreements. Simply put, Hogansville will soon transition to the new wastewater treatment plant (constructed with your client's assistance) and the current flow violations cannot be allowed to carry forward to the new plant.

I look forward to hearing from you should this leave you with any questions or should you wish to discuss further.

With best regards, I am

Very truly yours,

LEWIS, TAYLOR & TODD, P.C.



Jeffrey M. Todd

JT/mjj

cc: Mayor & Council (Via E-Mail)
David Milliron (Via E-Mail)

Jeff/Hogansville/Agreements/Meriwether Wastewater/trammel 1-violation

Laboratory Reports - Meriwether County Water Sewer Authority - Exhibit A

Location	Grab Date	Acidity	Ammonia Nitrogen 20 mg/L	Biochemical Oxygen Demand (BOD-5) 250 mg/L	Total Fats, Oils or Grease (FOG), Total HEM 100 mg/L	Normal Domestic Range (6.5 - 8.5)	pH	Total Kjeldahl nitrogen 20 mg/L	Total Phosphorus (P) 10 mg/L	Total Suspended Solids
Sewer Use Ordinance Limits										
Dongwon	12/15/2016	BDL	82	463	11.1	8.87	8.87	246	70.30	
Mando No. 1	12/15/2016	10	134	491	50.4	8.55	8.55	210	64.20	
Mando No. 2	12/15/2016	BDL	12	94	9.5	7.04	7.04	57	8.23	
Meriwether Well	12/15/2016	180	229	1,660	61.2	7.99	7.99	259	10.10	
Meriwether Well	12/11/2017	BDL	156	89	25.1	7.49	7.49	172	9.25	
Meriwether Well	02/06/2018	BDL	149	182	11.2	7.46	7.46	226	4.08	
Meriwether Well	02/14/2018	BDL	193	189	18.7	7.56	7.56	176	5.80	
Meriwether Well	02/21/2018	BDL	172	118	20.6	7.54	7.54	212	6.00	
Meriwether Well	02/28/2018	BDL	184	129	18.4	7.49	7.49	215	5.80	
Meriwether Well	12/05/2018	165	203	136	14.3	7.46	7.46	229	6.20	
Meriwether Well	12/12/2018	138	235	162	5.4	7.75	7.75	280	2.12	
Meriwether Well	01/18/2019	166	127	283	13.2	7.52	7.52	174	4.42	
Meriwether Well	02/07/2019	145	322	357	13.2	7.60	7.60	328	1.13	
Meriwether Well	02/20/2019	240	360	247	18.4	7.54	7.54	318	6.06	
Meriwether Well	03/06/2019	184	268	199	12.4	7.77	7.77	292	3.87	
Meriwether Well	03/27/2019	183	224	190	15.6	7.45	7.45	265	7.38	
Meriwether Well	04/10/2019	161	425	264	18.5	7.84	7.84	495	1.43	
Meriwether Well	04/24/2019	121	205	106	24.0			189	3.74	
Meriwether Well	05/08/2019	135	232	86	26.2	7.85	7.85	245	3.15	
Meriwether Well	05/29/2019	212	186	102	124.0	7.08	7.08	234	8.55	108
Meriwether Well	06/04/2019	139	355	96	9.7	7.77	7.77	312	6.45	
Meriwether Well	07/09/2019	219	247	152	5.8	7.52	7.52	282	1.77	

Revised Corrected
9/17/2019

THE TRAMMELL FIRM, LLC
ATTORNEYS AT LAW

Robert T. Trammell, Jr.
Kathleen G. McBride (of counsel)
Melissa M. Sams

September 6, 2019

**VIA CERTIFIED MAIL,
RETURN RECEIPT REQUESTED
AND VIA FEDERAL EXPRESS**

Mr. Gabe Gribble
District Manager
Turkey Run Landfill
7144 Lone Oak Road
Hogansville, GA 30230

**RE: NOTICE OF VIOLATION AND NOTICE TO CEASE AND DESIST
IMMEDIATELY AND PERMANENTLY DISCHARGES IN VIOLATION OF
PRESCRIBED SEWER USE ORDINANCE LIMITS; REQUIREMENT FOR
PRETREATMENT GOING FORWARD**

Dear Mr. Gribble:

This law firm represents the Meriwether County Water & Sewerage Authority (MCWSA). Over the past year and a half, the MCWSA has had various discussions with you and Waste Management regarding the discharges from Turkey Run Landfill into the Meriwether County sewer collection system. As you are aware, sampling tests have shown that Turkey Run Landfill's discharge into the Meriwether County sewer collection system have exceeded the prescribed limits at the time under the Meriwether County Sewer Use Ordinance; specifically, the limits for Ammonia Nitrogen, BOD-5, COD, and Total Kjeldahl nitrogen have been consistently exceeded.

As you are further aware, the City of Hogansville is finishing completion of its new wastewater treatment plant, which has been constructed with the assistance of the MCWSA. The City of Hogansville has adopted new limits, which are more stringent than the limits that Turkey Run Landfill is already exceeding. Meriwether County has now also adopted more stringent limits, which have been provided to you, in anticipation of the new wastewater treatment plant coming online. Although there have been numerous meetings and discussions between MCWSA and Turkey Run Landfill about these issues, there has been no concrete plan with timetables presented by Turkey Run Landfill to MCWSA with respect to how to remedy this situation.

Enclosed is a letter dated August 27, 2019 from Jeff Todd, City attorney for the City of Hogansville, on behalf of the City of Hogansville to me as counsel for the MCWSA. As you will observe, the letter has put MCWSA on notice that the City of Hogansville will stop accepting all future flows from MCWSA until steps are taken that are necessary to bring the discharges and flows into compliance with the limits established under Hogansville's ordinance and MCWSA's sewer use ordinance and agreement. I am forwarding the enclosed letter to you to put Turkey Run Landfill on immediate notice that it must take immediate action to cease discharging above

the limits into the Meriwether County Sewer System, or the MCWSA will terminate sewer service until the situation has been corrected.

This letter therefore constitutes a Notification of Violation pursuant to Section 14-224 of the Meriwether County Code of Ordinances that Turkey Run Landfill has and continues to discharge into the Meriwether County sewer collection system in excess of the prescribed limits under Meriwether County's Sewer Use Ordinance (including but not limited to exceeding the limits for Ammonia Nitrogen, BOD-5, COD, and Total Kjeldahl nitrogen). **Turkey Run Landfill has seven days from the date of this letter to present a corrective plan of action to be approved by the MCWSA, the City of Hogansville, and its engineer.**

Pursuant to Section 14-226 of the Meriwether County Code of Ordinances, this letter constitutes an immediate notice to cease permanently all discharges in excess of the applicable limits prescribed in the Meriwether County Sewer Use Ordinance.

Pursuant to Section 14-229 of the Meriwether County Code of Ordinances, this letter advises you that the MCWSA intends to exercise its powers thereunder to prevent discharges to the POTW which will cause interference with the POTW.

Finally, this letter notifies you **that Turkey Run Landfill will be required to pretreat all waste and wastewater prior to discharge into the Meriwether County sewer collection system within 45 days of this letter. Plans for the pretreatment program must be submitted to and approved by the MCWSA.**

Govern yourself accordingly.

Very Truly Yours,



Robert T. Trammell, Jr.
Attorney for the MCWSA

Encl.

cc: MCWSA (via email w/encl.)
Mr. Theron Gay (via email w/ encl.)
Nathan Lee, Esq. (via email w/ encl.)
Jeffrey M. Todd, Esq. (via email w/ encl.)
Greenbow, LLC (via certified mail w/encl.)
Waste Management of Georgia, Inc. (via certified mail w/encl.)