



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

OCT 29 2013

CERTIFIED MAIL 7012 1010 0001 8097 1730
RETURN RECEIPT REQUESTED

Mr. Christopher J. Latimer
Mitchell, McNutt & Sams
P. O. Box 1366
Columbus, Mississippi 39703-1366

Re: Consent Agreement and Final Order
Docket No.: CWA-04-2013-4513(b)
National Pollutant Discharge Elimination System Permit No.: MS0036145
City of Starkville, Mississippi

Dear Mr. Latimer:

Enclosed please find a fully executed copy of the Consent Agreement and Final Order finalized by the U.S. Environmental Protection Agency Region 4 and the Regional Judicial Officer. Please make note of the provisions under Section IV. Payment.

Please contact Mr. Dennis Sayre at (404) 562-9756 or via email at sayre.dennis@epa.gov, if you have any questions or concerns regarding this matter. Legal inquiries should be directed to Mr. Matthew Hicks, Assistant Regional Counsel, at (404) 562-9670 or via email at hicks.matthew@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Denisse D. Diaz".

Denisse D. Diaz, Chief
Clean Water Enforcement Branch
Water Protection Division

Enclosure

cc: Mr. Doug Devlin
City of Starkville, Mississippi

Mr. Chris Sanders
Mississippi Department of Environmental Quality

Mr. J. I. Palmer, Jr.
Butler, Snow, O'Mara, Stevens and Cannada. PLLC

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:

THE CITY OF STARKVILLE
MISSISSIPPI

Respondent.

)
) CONSENT AGREEMENT AND
) FINAL ORDER
)
)
) Docket No.: CWA-04-2013-4513(b)
)

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CONSENT AGREEMENT

I. Statutory Authority

1. This is a civil penalty proceeding pursuant to Section 309(g)(2)(B) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(g)(2)(B), and the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, published at 64 Fed. Reg. 40176 (July 23, 1999), codified at 40 Code of Federal Regulations ("C.F.R.") Part 22 ("Part 22").

2. The authority to take action under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), is vested in the Administrator of the United States Environmental Protection Agency ("EPA"). The Administrator has delegated this authority to the Regional Administrator, Region 4, who in turn has delegated this authority to the Director of the Water Protection Division ("Complainant").

II. Allegations

3. At all times relevant to this action, the City of Starkville, Mississippi ("Respondent"), was a municipality duly organized and existing under the laws of the State of Mississippi and, therefore, a "person" within the meaning of Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

4. At all times relevant to this action, Respondent owned and/or operated the Starkville Publicly Owned Treatment Works ("POTW"), including a Wastewater Collection and Transmission System (WCTS) and the Starkville Wastewater Treatment Plant (WWTP) located at 305 Sand Road, Starkville, Mississippi, operating under National Pollutant Discharge Elimination System ("NPDES") permit number MS0036145 (the "Permit"). The Permit was issued to the Respondent by the State of Mississippi pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

5. The POTW discharges "pollutants" as a point source into the Hollis Creek, a navigable water, as defined in Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

6. The Permit became effective on February 24, 2010, and expires on January 31, 2015.

7. The Permit includes a requirement, Condition No. T-28, issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, to properly operate and maintain the POTW, including the WCTS which transports wastewater to the WWTP.

8. On October 23, 2012, the EPA sent an Information Request Letter, pursuant to Section 308 of the CWA, 33 U.S.C. § 1318, to Respondent requesting information related to Sanitary Sewer Overflows (SSOs), to evaluate the performance of the WWTP and its associated WCTS, and to assess the City's compliance with the Permit and the CWA. For purposes of this Consent Agreement and Final Order ("CA/FO"), a SSO is defined as an overflow, spill, release, or diversion of wastewater from Respondent's WCTS. SSOs include overflows or releases of wastewater that reach navigable waters; overflows or releases of wastewater that do not reach navigable waters; and wastewater backups into buildings that are caused by blockages or flow conditions in a sanitary sewer other than a building lateral. Wastewater backups into buildings caused by a blockage or other malfunction of a building lateral that is privately owned is not a SSO.

9. On January 30 and 31, 2013, the EPA and the State of Mississippi conducted a Compliance Evaluation Inspection (CEI) of the WWTP's associated WCTS to further evaluate Respondent's compliance with its Permit and the CWA.

10. Based on its review of information obtained and observations made during its inspection, the EPA found that Respondent has experienced numerous SSOs. See Attachment A for a list of these SSOs.

11. To accomplish the objective of the CWA (defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), as to restore and maintain the chemical, physical and biological integrity of the nation's waters), Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants by any person into waters of the United States except as in compliance with an NPDES permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

12. EPA alleges that Respondent has violated Section 301(a) of the CWA, 33 U.S.C. § 1311(a), by experiencing SSOs of raw sewage from its WCTS into waters of the United States and experiencing SSOs, including those that do not reach waters of the United States and building backups caused by flow conditions in the Respondent's WCTS, that are the result of improper operation and maintenance in violation of Condition No. T-28 of the NPDES permit.

III. Stipulations and Findings

13. Complainant and Respondent have conferred for the purpose of settlement pursuant to 40 C.F.R. § 22.18 and desire to resolve this matter and settle the allegations described herein without a formal hearing. Therefore, without the taking of any evidence or testimony, the making of any argument, or the adjudication of any issue in this matter, and in accordance with 40 C.F.R. § 22.13(b), this CA/FO will simultaneously commence and conclude this matter.

14. For the purposes of this CA/FO, Respondent admits the jurisdictional allegations set out above and neither admits nor denies the factual allegations set out above.

15. Respondent hereby waives its right to contest the allegations set out above and its right to appeal the Final Order accompanying this Consent Agreement.

16. By signing this CA/FO, Respondent certifies that the information it has supplied concerning this matter was at the time of submission, and is, truthful, accurate, and complete for each such submission, response and statement. Respondent realizes that there are significant penalties for submitting false or misleading information, including the possibility of fines and/or imprisonment for knowing submission of such information.

17. EPA reserves the right to assess and collect any and all civil penalties for any violation described herein to the extent that any information or certification provided by Respondent was materially false or inaccurate at the time such information or certification was provided to EPA.

18. Complainant and Respondent agree to settle this matter by their execution of this CA/FO. The parties agree that the settlement of this matter is in the public interest and that this CA/FO is consistent with the applicable requirements of the CWA.

IV. Payment

19. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), and 40 C.F.R Part 19, and considering the nature of the violations and other relevant factors, the EPA has determined that \$70,800 is an appropriate civil penalty to settle this action. Respondent consents to the assessment of and agrees to pay the civil penalty and consents to the other conditions set forth in this CA/FO.

20. Respondent shall submit payment of the penalty specified in the preceding paragraph within thirty (30) days of the effective date of this CA/FO via a cashier's or certified check, payable to the order of "Treasurer, United States of America." The check shall reference on its face the name of Respondent and the Docket Number of this CA/FO. Such payment shall be tendered to:

U.S. Environmental Protection Agency
Fines and Penalties
Cincinnati Finance Center
P.O. Box 979077
St. Louis, Missouri 63197-9000

21. At the time of payment, Respondent shall send a separate copy of the check, and a written statement that payment has been made in accordance with this CA/FO, to the following persons at the following addresses:

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

Mary Mattox
U.S. Environmental Protection Agency, Region 4
Water Protection Division
Clean Water Enforcement Branch
Municipal and Industrial Enforcement Section
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

22. The penalty amount specified in Paragraph 19 above shall represent civil penalties assessed by EPA and shall not be deductible for purposes of Federal taxes.

23. Pursuant to Section 309(g)(9) of the CWA, 33 U.S.C. § 1319(g)(9), failure by the Respondent to pay the penalty assessed by the CA/FO in full by its due date may subject the Respondent to a civil action to collect the assessed penalty plus interest (at currently prevailing rates from the effective date of this CA/FO), attorney's fees, costs for collection proceedings and a quarterly nonpayment penalty for each quarter during which such failure to pay persists. Such nonpayment penalty shall be in an amount equal to twenty percent (20%) of the aggregate amount of such penalty and nonpayment penalty which are unpaid as of the beginning of such quarter. In any such collection action, the validity, amount and appropriateness of the penalty and of this CA/FO shall not be subject to review.

V. General Provisions

24. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state, or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state, or local permit. Other than as expressed herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to federal laws and regulations administered by the EPA.

25. Nothing in this CA/FO shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of Respondent's violation of this CA/FO or of the statutes and regulations upon which this CA/FO is based, or for Respondent's violation of any federal or state statute, regulation or permit.

26. Except as otherwise set forth herein, this CA/FO constitutes a settlement by Complainant and Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Except as otherwise set forth herein, compliance with this CA/FO shall resolve the allegations of violations contained herein. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal liability of the Respondent, or other liability resulting from violations that were not alleged in this CA/FO. Other than as expressed herein, Complainant does not waive any right to bring an enforcement action against Respondent for violation of any federal or state statute, regulation or permit, to initiate an action for imminent and substantial endangerment, or to pursue criminal enforcement.

27. Each undersigned representative of the parties to this CA/FO certifies that he or she is fully authorized to enter into the terms and conditions of this CA/FO and to execute and legally bind that party to it.

28. This CA/FO applies to and is binding upon Respondent and its officers, directors, employees, agents, successors and assigns.

29. Any change in the legal status of Respondent, including, but not limited to, any transfer of assets of real or personal property, shall not alter Respondent's responsibilities under this CA/FO.

30. Each party shall bear its own costs and attorneys fees in connection with the action resolved by this CA/FO.

31. In accordance with 40 C.F.R. § 22.5, the individuals below are authorized to receive service relating to this proceeding.

For Complainant:

Matthew Hicks
Associate Regional Counsel
Office of Environmental Accountability
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9670

For Respondent:

Christopher J. Latimer
Mitchell, McNutt & Sams
P. O. Box 1366
Columbus, MS 39703-1366
(662) 328-2316

32. The parties acknowledge and agree that this CA/FO is subject to the requirements of 40 C.F.R. § 22.45(c)(4), which provides a right to petition to set aside a consent agreement and proposed final order based on comments received during the public comment period.

33. Pursuant to Section 309(g) of the CWA, 33 U.S.C. § 1319(g), and 40 C.F.R. § 22.38(b), Complainant represents that the State of Mississippi was provided a prior opportunity to consult with Complainant regarding this matter.

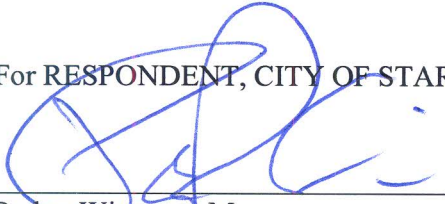
34. Effective upon signature of this CA/FO by Respondent, Respondent agrees that the time period commencing on the date of its signature and ending on the date EPA receives from Respondent the payment required by this CA/FO shall not be included in computing the running of any statute of limitations potentially applicable to any action brought by the EPA related to the matters addressed in this CA/FO and that, in any action brought by the EPA related to the matters addressed, Respondent will not assert, and may not maintain, any defense or claim based upon principles of statute of limitations, waiver, laches, estoppel, or other defense based on the passage of time during such period. If EPA gives notice to Respondent that it will not make this CA/FO effective, the statute of limitations shall begin to run again commencing ninety days after the date such notice is sent by EPA.

VI. Effective Date

35. The effective date of this CA/FO shall be the date on which the CA/FO is filed with the Regional Hearing Clerk.

AGREED AND CONSENTED TO:


For RESPONDENT, CITY OF STARKVILLE:



Parker Wiseman, Mayor
The Mayor and Aldermen of the City of Starkville

Date: 8/13/2013

For COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY:



James D. Giattina
Director
Water Protection Division
U.S. Environmental Protection Agency
Region 4

Date: 10/22/13

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4**

IN THE MATTER OF:

**THE CITY OF STARKVILLE
MISSISSIPPI**

Respondent.

)
) **CONSENT AGREEMENT AND**
) **FINAL ORDER**
)
)
) **Docket No.: CWA-04-2013-4513(b)**

FINAL ORDER

In accordance with the *Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders and the Revocation, Termination or Suspension of Permits*, 40 C.F.R. Part 22, and authorities delegated to me, the forgoing Consent Agreement is hereby approved and incorporated by reference into this Final Order. Pursuant to Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), Respondent is hereby ordered to comply with the terms of the foregoing Consent Agreement.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: OCT 23 2013



A. Stanley Meiburg
Acting Regional Administrator
U.S. EPA, Region 4

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the attached **CONSENT AGREEMENT AND FINAL ORDER** in the matter of The City of Starkville, Mississippi, Docket No. CWA-04-2013-4513(b) (filed with the Regional Hearing Clerk on 10-29, 2013, was served on 10-29, 2013, in the manner specified to each of the persons listed below.

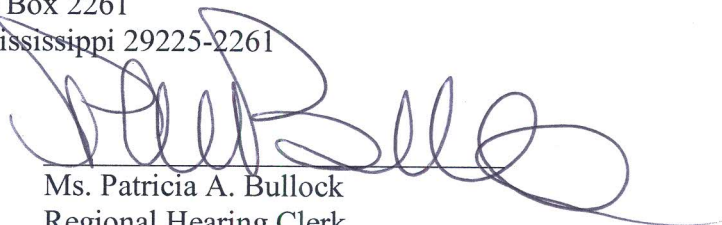
By hand-delivery:

Matthew Hicks
Associate Regional Counsel
Office of Environmental Accountability
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

By certified mail,
return receipt requested:

Christopher J. Latimer
Mitchell, McNutt & Sams
P. O. Box 1366
Columbus, MS 39703-1366

Chris Sanders
Director, Environmental Compliance & Enforcement Division
Office of Pollution Control
Mississippi Department of Environmental Quality
Post Office Box 2261
Jackson, Mississippi 29225-2261



Ms. Patricia A. Bullock
Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 4
Atlanta Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9511

Attachment A
“City Sanitary Sewer Overflows”

Date	Street #	Street name	Destination	Waters of the U.S.	Volume	Cause
8/12/2008		Carver Dr.	Josey Creek	Josey Creek		I&I
9/19/2008		Carver Dr.	Josey Creek	Josey Creek		I&I
9/22/2008		Country Side Dr.	Hollis Creek	Hollis Creek		Unknown
9/25/2008		Lewis Pasture	Josey Creek	Josey Creek		Grease
11/4/2008		Caldwell St.	Unnamed ditch			Pipe Collapse
12/9/2008	600	Carver Dr.	Josey Creek	Josey Creek		I&I
12/11/2008	102	Cedar Ln.	Sand Creek	Sand Creek		I&I
12/11/2008	107	Woodcrest	Sand Creek	Sand Creek		I&I
12/11/2008	508	Carver Dr.	Josey Creek	Josey Creek		I&I
12/11/2008		Lindberg Blvd	Glenn Creek	Glenn Creek		I&I
1/26/2009	304	Ward Dr.	Unnamed ditch		2500	Roots
2/5/2009		Caldwell St.	Unnamed ditch			Grease
2/7/2009		Hospital Road Woods	Josey Creek	Josey Creek		Roots
2/27/2009	410	MLK Dr	Unnamed ditch			I&I
2/27/2009		Hwy 12 and Spring	Unnamed ditch			I&I
3/19/2009		Elm Place	Unnamed ditch			Roots
4/22/2009	304	Josey Ave	Unnamed ditch			Unknown
6/10/2009	803	University Dr.	Unnamed ditch			Unknown
6/15/2009	101	Academy Rd.	Hollis Creek	Hollis Creek		Roots
6/15/2009		Locksley Way	Unnamed ditch			Unknown
6/22/2009	410	Oktibbeha Dr.	Unnamed ditch			Roots
8/14/2009	107	Country Side Dr.	Hollis Creek	Hollis Creek		Unknown
8/14/2009		Henderson St.	Josey Creek	Josey Creek		Unknown
8/24/2009		Academy Rd.	Hollis Creek	Hollis Creek		Grease
9/2/2009	504	S Washington St	Hollis Creek	Hollis Creek		Unknown
9/3/2009		Reed Rd	Josey Creek	Josey Creek		creek bank collapse next to FM
9/9/2009	107	Cedar Ln.	Sand Creek	Sand Creek		Unknown
9/9/2009	204	Honeysuckle	Hollis Creek	Hollis Creek		Grease
9/21/2009	1741	Louisville Rd.	Hollis Creek	Hollis Creek		Grease
9/22/2009	202	Hillside Dr.	Sand Creek	Sand Creek		I&I
9/22/2009		Carver Dr.	Josey Creek	Josey Creek		I&I
9/22/2009		Wood St	Hollis Creek	Hollis Creek		I&I
10/20/2009	408	Old West Point Rd.	Sand Creek	Sand Creek		Grease
10/23/2009	904	N Montgomery St	Unnamed ditch			Unknown
11/1/2009	504	Academy Rd.	Hollis Creek	Hollis Creek		Grease

1/4/2010		Reed Rd	Josey Creek	Josey Creek		next to FM
1/19/2010	103	Caldwell St.	Unnamed ditch			Roots
2/18/2010	202	S Washington St	Unnamed ditch		3600	Unknown
2/22/2010		Reed Rd	Josey Creek	Josey Creek		creek bank collapse next to FM
3/10/2010	611	Carver Dr.	Josey Creek	Josey Creek	700	I&I
3/19/2010		Hwy 12 E	Unnamed ditch			Grease
4/22/2010		Pilcher St	Josey Creek	Josey Creek		Unknown
4/26/2010	515	Carver Dr.	Josey Creek	Josey Creek		I&I
5/3/2010		Carver Dr.	Josey Creek	Josey Creek		I&I
5/21/2010		Carver Dr.	Josey Creek	Josey Creek		I&I
11/4/2010	106-108	Trotter Ln.	Sand Creek	Sand Creek		Unknown
11/29/2010	415	Oktibbeha Dr.	Sand Creek	Sand Creek		Grease
12/8/2010	104	Tanglewood Dr.	Sand Creek	Sand Creek		Roots
1/1/2011	109	Woodcrest	Sand Creek	Sand Creek		Unknown
1/1/2011		Carver Dr.	Josey Creek	Josey Creek		I&I
1/1/2011		Crossgate St.	Josey Creek	Josey Creek		I&I
1/4/2011		E Gillispee, Cotton Crossing	Catalpa Creek	Catalpa Creek		Unknown
1/6/2011	1009	Louisville Rd.	Hollis Creek	Hollis Creek		I&I
1/13/2011	601	Carver Dr.	Josey Creek	Josey Creek		Unknown
1/21/2011		Windsor Rd.	Josey Creek	Josey Creek		Blockage
1/30/2011	401	Hwy 12 W	Glenn Creek	Glenn Creek		Defective air valve
2/21/2011	1743	S Montgomery St.	Skinner Creek	Skinner Creek		I&I
2/28/2011		Carver Dr.	Josey Creek	Josey Creek		I&I
3/9/2011		Lynn Lane	Glenn Creek	Glenn Creek		Leak in D.I. force main
3/11/2011	1085	Stark Rd.	Josey Creek	Josey Creek		Roots
3/16/2011		Edgewood Dr.	Sand Creek	Sand Creek		Unknown
4/4/2011	408	Old West Point Rd.	Sand Creek	Sand Creek		Unknown
4/6/2011	408	Old West Point Rd.	Sand Creek	Sand Creek		I&I
4/15/2011	240-236	Helen Cir	Glenn Creek	Glenn Creek		I&I
4/15/2011	504	Critz St.	Sand Creek	Sand Creek		I&I
4/15/2011		Carver Dr.	Josey Creek	Josey Creek		I&I
4/15/2011		Eckford Dr.	Glenn Creek	Glenn Creek		I&I
4/15/2011		Edgewood Dr.	Sand Creek	Sand Creek		I&I
4/15/2011		Lindberg Blvd	Glenn Creek	Glenn Creek		I&I
4/15/2011		Woodcrest Dr	Sand Creek	Sand Creek		I&I
4/20/2011	103	Edgewood Dr.	Sand Creek	Sand Creek		I&I
4/20/2011	104	Woodcrest Dr.	Sand Creek	Sand Creek		I&I

4/20/2011	236	240-236 Helen Cir	Glenn Creek	Glenn Creek		I&I
4/20/2011	611	Carver Dr.	Josey Creek	Josey Creek		I&I
4/20/2011	1019	Lynn Lane	Glenn Creek	Glenn Creek		I&I
4/20/2011		Eckford Dr.	Glenn Creek	Glenn Creek		I&I
4/20/2011		Hwy 182 W	Josey Creek	Josey Creek		I&I
4/20/2011		Lindberg Blvd	Glenn Creek	Glenn Creek		I&I
5/9/2011		S Montgomery St.	Catalpa Creek	Catalpa Creek		Unknown
6/13/2011	904	Barnett	Hollis Creek	Hollis Creek		Unknown
9/17/2011		Carver Dr.	Josey Creek	Josey Creek		I&I
9/17/2011		Woodcrest Dr	Josey Creek	Josey Creek		I&I
10/17/2011	112	W Gillespie St.	Hollis Creek	Hollis Creek		Grease
10/22/2011	204	Hillside Dr.	Sand Creek	Sand Creek		Grease
10/24/2011	326	Hospital Road Woods	Josey Creek	Josey Creek		Grease
11/14/2011		Pony Pasture	Sand Creek	Sand Creek		Float hungon rail
11/22/2011		Reed Rd at Hospital Rd.	Josey Creek	Josey Creek		Unknown
12/9/2011	234	Carver Dr.	Josey Creek	Josey Creek		Unknown
12/20/2011		Chapin St.	Josey Creek	Josey Creek		Roots
12/21/2011	600	Carver Dr.	Josey Creek	Josey Creek		I&I
12/21/2011		McKee Park	Glenn Creek	Glenn Creek		Roots
12/26/2011	601	Carver Dr.	Josey Creek	Josey Creek		I&I
1/4/2012		Hwy 12 and Spring	Catalpa Creek	Catalpa Creek		Unknown
1/17/2012	107	Brandon Rd.	Josey Creek	Josey Creek		Roots
1/17/2012	801	Russell St.	Catalpa Creek	Catalpa Creek		Roots
1/18/2012	604	E Gillespie St	Catalpa Creek	Catalpa Creek		Unknown
2/4/2012	611	Carver Dr.	Josey Creek	Josey Creek		I&I
2/14/2012	605	McKee St.	Hollis Creek	Hollis Creek		Grease
3/9/2012		Hwy 25	Hollis Creek	Hollis Creek		Electrical
3/15/2012	509	Lincoln Green	Catalpa Creek	Catalpa Creek		Unknown
3/22/2012	610	Carver Dr.	Josey Creek	Josey Creek		I&I
3/30/2012	213	Seville	Josey Creek	Josey Creek		Grease
4/4/2012		Reed Rd at Hospital Rd.	Josey Creek	Josey Creek		Grease
4/17/2012		Pony Pasture	Sand Creek	Sand Creek	500	Faulty Gasket
4/19/2012	215	Pilcher St	Josey Creek	Josey Creek		Unknown
4/30/2012	2702	Douglas McArthur Dr	Glenn Creek	Glenn Creek		Unknown
5/1/2012	613	Lake View	Sand Creek	Sand Creek		Unknown
5/31/2012	160	Pecan Acres	Hollis Creek	Hollis Creek		Unknown
6/1/2012	108	Park Ave.	Josey Creek	Josey Creek		Unknown
6/3/2012	803	S Montgomery St.	Catalpa Creek	Catalpa Creek	800	Roots

6/13/2012	408	Old West Point Rd.	Sand Creek	Sand Creek	860	Unknown
6/24/2012	1106	Yorkshire	Catalpa Creek	Catalpa Creek		Roots
6/26/2012	127	Elm Place	Hollis Creek	Hollis Creek		Unknown
6/30/2012	226	Hiawasse Dr	Josey Creek	Josey Creek	960	Unknown
7/11/2012	104	Woodcrest	Sand Creek	Sand Creek	960	I&I
7/11/2012	510	Carver Dr.	Josey Creek	Josey Creek		I&I
7/11/2012	611	Carver Dr.	Josey Creek	Josey Creek		I&I
7/11/2012	2101	Maple St	Josey Creek	Josey Creek	2160	Unknown
8/5/2012	114	Southdale	Catalpa Creek	Catalpa Creek	1440	Grease
8/8/2012		Old W Point Rd at Chapin St	Sand Creek	Sand Creek	660	Unknown
8/9/2012	109	Woodcrest	Sand Creek	Sand Creek	800	I&I
8/9/2012	164	Park Cir	Glenn Creek	Glenn Creek	200	Unknown
8/9/2012		Lindberg at Hwy 12	Glenn Creek	Glenn Creek	900	I&I
8/9/2012	601	Carver Dr.	Josey Creek	Josey Creek		I&I
8/9/2012	611	Carver Dr.	Josey Creek	Josey Creek		I&I
8/9/2012	801	Lindley Ave	Hollis Creek	Hollis Creek	300	I&I
8/9/2012	1003	Howard Rd.	Hollis Creek	Hollis Creek	450	I&I
8/18/2012	600	Carver Dr.	Josey Creek	Josey Creek		I&I
8/18/2012	601	Carver Dr.	Josey Creek	Josey Creek		I&I
8/18/2012	611	Carver Dr.	Josey Creek	Josey Creek		I&I
9/3/2012	109	Woodcrest	Sand Creek	Sand Creek		I&I
9/3/2012	209	Woodlawn	Sand Creek	Sand Creek	600	Roots
9/3/2012	601	Carver Dr.	Josey Creek	Josey Creek		I&I
9/3/2012	611	Carver Dr.	Josey Creek	Josey Creek		I&I
9/6/2012	102	Forest Hill	Josey Creek	Josey Creek		Unknown
9/9/2012		N Montgomery at Greenfield St	Sand Creek	Sand Creek	1170	Unknown
9/12/2012	400	Scales St.	Glenn Creek	Glenn Creek	480	Unknown
9/15/2012	113	Tabor St	Sand Creek	Sand Creek	1340	Unknown
9/18/2012	108	Tanglewood Dr.	Sand Creek	Sand Creek	480	Roots
9/20/2012	400	Scales St.	Glenn Creek	Glenn Creek	1040	Grease
9/25/2012		Carroll St	Hollis Creek	Hollis Creek	2880	Unknown
9/27/2012	210	Seville	Josey Creek	Josey Creek	720	Unknown
9/29/2012	210	Seville	Josey Creek	Josey Creek	664	Unknown
9/29/2012		Zuber St.	Josey Creek	Josey Creek	1250	Grease
9/30/2012	119	Tabor St	Sand Creek	Sand Creek	13880	Unknown
10/25/2012	316	Scales St.	Glenn Creek	Glenn Creek	480	Unknown
11/7/2012	9	McDowell St.	Glenn Creek	Glenn Creek	1464	Unknown

EPA ACCOUNTS RECEIVABLE CONTROL NUMBER FORM

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TO BE COMPLETE BY ORIGINATING OFFICE:

(attach a copy of the final order and transmittal letter to Defendant/Respondent)

This form was originated by: Mary Mattox 8/22/13
[Name] [Date]
in the WPD/CWEB/Municipal and Industrial Section at 404-562-9733
[Office] [Telephone Number]

- Non-SF Judicial Order/Consent Decree. USAO COLLECTS.
- Administrative Order/Consent Agreement. FMS COLLECTS PAYMENT.
- SF Judicial Order/Consent Decree. FMS COLLECTS.
- Other Receivables
- This is an original debt.
- This is a modification.

PAYEE: City of Starkville, MS
[Name of person and/or Company/Municipality making the Payment]

The Total Dollar Amount of Receivable: \$ 70,800
[If in installments, attach schedule of amounts and respective due dates]

The Case Docket Number: CWA-04-2013-4513(b)

The Site-Specific Superfund (SF) Account Number: _____

The Designated Regional/Headquarters Program Office: Region 4 Water Protection Division

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TO BE COMPLETED BY LOCAL FINANCIAL MANAGEMENT SECTION:

The IFMS Accounts Receivable Control Number is: _____
If you have any questions call: _____ in the Financial Management Section,
Telephone Number: _____

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DISTRIBUTION:

A. JUDICIAL ORDERS: Copies of this form with an attached copy of the front page of the FINAL JUDICIAL ORDER should be mailed to:

- 1. Debt Tracking Officer
Environmental Enforcement Section
Department of Justice/RH 1647
P.O. BOX 7611, Benjamin Franklin Station
Washington, DC 20044
- 2. Originating Office (ORC)
- 3. Designated Program Office

B. ADMINISTRATIVE ORDERS: Copies of this form with an attached copy of the front page of the ADMINISTRATIVE ORDER should be sent to:

- 1. Originating Office
- 2. Designated Program Office
- 3. Regional Hearing Clerk
- 4. Regional Counsel

Case Docket Control Number: CWA-04-2013-4513(b)

Total Amount Due: \$ 70,800

Full payment due within 30 days of the effective date of the CAFO.

Installment payments to be paid:

Amount Due:	Date Due:
\$ _____	_____
\$ _____	_____
\$ _____	_____
\$ _____	_____