



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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

DEC 13 2018

CERTIFIED MAIL 7010 1060 0002 1703 8846
RETURN RECEIPT REQUESTED

Columbus Consolidated Government
c/o Ms. Lucy Sheftall
Assistant City Attorney
420 10th Street
Columbus, Georgia 31901

Re: Consent Agreement and Final Order
Docket No.: CWA-04-2018-4500(b)
Columbus Consolidated Government, Columbus, Georgia

Dear Ms. Sheftall:

Enclosed is a fully executed copy of the Consent Agreement and Final Order that has been finalized by the U.S. Environmental Protection Agency, Region 4 and the Regional Administrator. Please make note of the provisions under Paragraph IV. Payment.

Should you have any questions or problems, please contact LCDR Tara L. Houda at (404) 562-9762. Legal inquiries should be directed to Mr. Paul Schwartz, Associate Regional Counsel, at (404) 562-9576.

Sincerely,

A handwritten signature in black ink, appearing to read "Jeannette M. Gettle".

Jeannette M. Gettle
Director
Water Protection Division

Enclosure

cc: Georgia Environmental Protection Division

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:)	
)	CONSENT AGREEMENT AND
COLUMBUS CONSOLIDATED)	FINAL ORDER
GOVERNMENT)	
)	
COLUMBUS, MUSCOGEE COUNTY,)	
GEORGIA)	
)	
RESPONDENT.)	DOCKET NO. CWA-04-2018-4500(b)

RECEIVED
SEP 13 2018 7:12

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*, including Subpart I, published at 64 Fed. Reg. 40,176 (July 23, 1999) and codified at 40 Code of Federal Regulations (“C.F.R.”) 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. 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, of the EPA, Region 4 (“Complainant”).

II. Allegations

3. Columbus Consolidated Government (“Respondent”) or (“CCG”) is a “municipality” existing under the laws of the State of Georgia and is 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, the Respondent owned and/or operated a municipal separate storm sewer system (MS4). in Columbus, Muscogee County, Georgia.

5. To accomplish the objectives of the CWA, defined in Section 101(a) of the CWA, 33 U.S.C. § 1251(a), 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 a National Pollutant Discharge Elimination System (“NPDES”) permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

6. Section 402 of the CWA, 33 U.S.C. § 1342, establishes an NPDES Permit Program authorizing the EPA or authorized states to administer the NPDES Permit Program, including the issuance of NPDES permits allowing for the discharge of pollutants, including stormwater, into navigable waters subject to specific terms and conditions. The EPA has granted the State of Georgia, through the Georgia Environmental Protection Division (“GAEPD”), approval to issue NPDES permits pursuant to Section 402(b) of the CWA.

7. Pursuant to 40 C.F.R. §122.26(a)(3), NPDES permits must be obtained for all discharges from large and medium MS4s.

8. The Respondent is a medium MS4 within the meaning of 40 C.F.R. § 122.26(b)(7).

9. GAEPD issued the *Authorization to Discharge Under the National Pollutant Discharge Elimination System Discharges from Municipal Separate Storm Sewer Systems* Permit No. GAS000202 (Permit) to the Respondent, to cover discharges from the Respondent’s MS4, with an effective date of April 12, 2012, and an expiration date of April 11, 2017.

10. **Part 5.1 of the Permit** states that the permittee must comply with all conditions of this Permit. Any permit noncompliance constitutes a violation of the Clean Water Act and the State Act and is grounds for an enforcement action.

11. **Permit Part 3.** requires that “The permittee shall update, implement, and enforce a” Storm Water Management Program (SWMP). “The SWMP and its amendments, upon approval by the EPD, shall become a part of this permit.” The SWMP Section 3.3.2 provides the Creek Walk Schedule that Respondent is required to follow.

12. **Permit Part 3.3.1.** requires that the Permittee’s stormwater management program include the elements listed in Table 3.3.1., including the following:

a. Table 3.3.1.a. “Provide an inventory and map of MS4 control structures as defined in the SWMP. At a minimum the inventory and map must include catch basins, ditches (mile or linear feet), detention/retention ponds, and storm drain lines (miles or linear feet). Include the total number of each type of structure with the 2012-2013 annual report. The inventory and map must be completed and submitted with the 2013-2014 annual report.”

b. Table 3.3.1. b. “Provide the number of MS4 control structures added during the reporting period, and the total number of structures in the inventory, in subsequent annual reports.”

13. **Permit Part 3.3.1.** Table 3.3.1.2.a. requires the Permittee to “conduct inspections of the MS4 control structures so that 100% of the structures are inspected within the 5-year permit term.” “The MS4 inspections shall be executed in accordance with the schedule contained in the SWMP. Provide the number and percentage of the total structures inspected during the reporting period in each annual report.”

14. **Permit Part 3.3.1.9.a.** requires the Permittee to “ensure that MS4 staff involved in municipal facility operation activities obtain the appropriate education and training.”

15. **Permit Part 3.3.2.3.b.** requires the Permittee to “implement investigative and follow-up procedures when the results of the screening indicate a potential illicit discharge, including the sampling and/or inspection procedures described in the SWMP. Provide information on illicit discharge detection activities performed to eliminate any identified illicit discharges during the reporting period in each annual report.”

16. **Permit Part 3.3.2.3.c.** requires the Permittee to “ensure any identified illicit discharges are eliminated. If necessary, implement the enforcement procedures described in the SWMP and in accordance with the Enforcement Response Plan (ERP) in Part 3.3.6 of this permit. Provide information on any enforcement actions taken for illicit discharges during the reporting period in each annual report.”

17. **Permit Part 3.3.3.1.a.** requires the Permittee to “develop and/or update an inventory of facilities with industrial activities that potentially discharge to the MS4. At a minimum, this shall include facilities listed on EPD’s Industrial Storm Water General Permit (IGP) Notice of Intent (NOI) and No Exposure Exclusion (NEE) online listings. Provide an updated inventory in each subsequent annual report. Provide the inventory with the 2012-2013 annual report.”

18. **Permit Part 3.3.3.2.a.** requires the Permittee to “implement the industrial facility inspection program which includes the facility inspection prioritization, inspection frequency, and inspection documentation protocol described in the SWMP.”

19. **Permit Part 3.3.3.2.b.** requires the Permittee to “implement a monitoring program for stormwater runoff from industrial facilities, waste facilities, hazardous waste treatment, storage and disposal facilities, as defined in the SWMP.”

20. **Permit Part 3.3.3.3.a.** requires the Permittee to “implement enforcement procedures described in the SWMP to be utilized if a stormwater violation is noted at an industrial facility that discharges to the MS4 during the reporting period and in accordance with the ERP in Part 3.3.6 of this permit. Provide documentation on any enforcement actions taken during the reporting period in each annual report.”

21. **Permit Part 3.3.3.4.a.** requires the Permittee to “implement educational activities for industrial facilities during the reporting period. Provide details of any educational activities performed during the reporting period in each annual report.”

22. **Permit Part 3.3.4.3.a.** requires the Permittee to “implement the construction site inspection program to ensure that structural and non-structural BMPs at construction sites are properly designed and maintained as specified in the” Construction General Permits.

23. **Permit Part 3.3.4.4.a.** requires the Permittee to “provide documentation on any enforcement actions taken during the reporting period in each annual report, including the number and type.”

24. **Permit Part 3.3.4.5.a.** requires the Permittee to “ensure that MS4 staff involved in construction activities subject to the CGPs are trained and certified in accordance with the rules adopted by the Georgia Soil and Water Conservation Commission. Provide the number and type of current certification in each annual report.”

25. **Permit Part 3.3.5.3.a.** requires the Permittee to “implement enforcement procedures to be utilized if a stormwater violation is noted at a Highly Visible Pollutant Source (HVPS) facility that discharges to the MS4 as described in the SWMP and in accordance with ERP in Part 3.3.6 of this permit. Provide documentation on any enforcement actions taken at HVPS facilities during the reporting period in each annual report.”

26. **Permit Part 3.3.10(a)(1).** requires that “The permittee must adopt ordinances, or update existing ordinances, when necessary for compliance with this permit, to address development and enforcement of post-construction controls.” “The ordinance revisions must include the adoption and implementation of either the Georgia Stormwater Management Manual (GSMM) or an equivalent local design manual, which must include the performance standards listed in Section 3.3.10(a)(2).” “The adoption of the design manual must have been completed by no later than April 13, 2012. The permittee must provide documentation to EPD in the 2011-2012 annual report to demonstrate the date the adoption of the design manual occurred.”

27. **Permit Part 4.1.** requires that “The report shall be submitted by May 15th following the reporting period.”

28. On December 2 through December 5, 2014, Leidos, contractor for the EPA, along with representatives from the EPA Region 4 and GAEPD, conducted an inspection of the Respondent’s MS4 Program to evaluate the Respondent’s compliance with Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p); the regulations promulgated thereunder at 40 C.F.R. § 122.26; and the Permit.

29. On April 24, 2015, the EPA sent a Notice of Violation (NOV) to the Respondent for violations of the CWA and the Permit observed by the EPA during the December 2 through December 5, 2014 inspection (December 2014 Inspection) and requested that the Respondent contact the EPA to schedule a Show Cause Meeting.

30. On June 9, 2015, the EPA received information from the Respondent in response to EPA’s NOV.

31. On June 10, 2015, a Show Cause Meeting was held between the EPA and the Respondent to discuss the alleged violations in the NOV.

32. On June 11, 2015, the EPA received additional information from the Respondent to in response to the EPA's NOV and information requested during the Show Cause Meeting.

33. Based on the December 2014 Inspection, the Show Cause Meeting, and information provided to the EPA by Respondent, the EPA makes the following allegations:

- a. The Respondent screened only 41 outfalls in 2013-14, and therefore, the Respondent failed to screen at least 20% of the 747 MS4 outfalls that year, in violation of Part 3 of the Permit. This violation was attributable in part to CCG's loss of staff during a hiring freeze. CCG made up some of these inspections as part of a negotiated schedule with the GAEPD.
- b. The Respondent has failed to provide the number of outfalls added during the reporting period and the total number of outfalls in the inventory in the annual reports, in violation of Part 3.3.1, Table 3.3.1.a. and Table 3.3.1.1.b of the Permit. According to Respondent, this violation was attributable in part to the difficulty CCG had in obtaining their data from a contractor.
- c. The 2012-13, 2013-14, and 2014-15 annual reports note that the total length of the structural control ditches is unknown. Because the total length of ditches is unknown, it could not be determined how the Respondent verifies that it is inspecting a reasonable percentage of the ditches annually to ensure 100% of ditches will be inspected during the permit cycle. The Respondent has failed to adequately document that 100% of ditches are being inspected within the 5-year permit cycle, in violation of Part 3.3.1.2.a. of the Permit. The 2014-15 Annual Report says "varies" for the frequency at which permanent control structures were inspected during this reporting period. According to Respondent, this violation was attributable in part to the difficulty CCG had in obtaining their data from a contractor.
- d. The reporting table for 3 annual reports (2013-2014, 2014-2015, and 2015-2016) does not include any MS4 outfalls that were inspected. The number of detention/retention ponds is inconsistent in the 2014-15 annual report and lists the count as 70, 71 and 74 depending on where one looks in the report. The Respondent was required to screen at least 20% of the 747 MS4 outfalls each year as committed to in the SWMP Section 3.3.2, in violation of Part 3.3.1. Table 3.3.1.2.a. of the Permit.
- e. The Respondent failed to include training of the MS4 staff involved in municipal facility operation activities (Chemical Application) in the 2012-13 Annual Report, in violation of Part 3.3.1.9.a. of the Permit.

- f. The Respondent failed to identify the source of dry weather flows, implement follow-up procedures, conduct enforcement, and provide information on the results of source identification activities, in violation of Part 3.3.2.3.b. of the Permit.
- g. The Respondent's industrial inventory and annual report do not contain all of the facilities listed on the Georgia EPD's Industrial Storm Water General Permit NOI and NEE online listings, in violation of Part 3.3.3.1.a. of the Permit.
- h. The industrial inspection prioritization criteria identified in the Respondent's SWMP, Section 3.3.3.2 were not followed, in violation of Part 3.3.3.2.a. of the Permit.
- i. The Respondent has not conducted monitoring of the industries listed in its inventory, in violation of Part 3.3.3.2.b. of the Permit.
- j. The Respondent is not documenting (in accordance with the ERP) and reporting all enforcement actions conducted in the industrial program, in violation of Part 3.3.3.3.a. of the Permit.
- k. Educational materials and training are not provided annually to all industries listed in the inventory, in violation of Part 3.3.3.4.a. of the Permit.
- l. The Respondent did not include a roster of training attendees for the Pine Grove Landfill employees, or copies of materials handed out at the training, in the annual reports, in violation of Part 3.3.3.5.a. of the Permit.
- m. The Respondent's construction inspections failed to evaluate and identify BMP maintenance issues, thus failing to ensure that structural BMPs at construction sites are properly maintained, in violation of Part 3.3.4.3.a. of the Permit.
- n. The Respondent has failed to document all enforcement actions taken in the construction program during the reporting period in each annual report, including the number and type, in violation of Part 3.3.4.4.a. of the Permit.
- o. The Respondent did not provide a list of the HVPS facilities against which enforcement was taken in the annual report, or outcomes, in violation of Part 3.3.5.3.a. of the Permit.
- p. The 2014-15 Annual Report was due by May 15, 2015. The Respondent requested and was granted an extension by the EPD until Friday May 29, 2015. The EPD did not receive the City's Annual Report until June 1, 2015, in violation of Part 4.1 of the Permit.

34. Therefore, the Respondent has violated Sections 301 and 402(p) of the CWA, 33 U.S.C. §§ 1311 and 1342(p), due to its failure to comply with the Permit.

III. Stipulations and Findings

35. Complainant and the 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 without the admission of any legal liability on the part of the Respondent and in accordance with 40 C.F.R. § 22.13(b), this Consent Agreement and Final Order (“CA/FO”) will simultaneously commence and conclude this matter.

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

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

38. The Respondent consents to the assessment of and agrees to pay the civil penalty as set forth in this CA/FO and consents to the other conditions set forth in this CA/FO.

39. By signing this CA/FO, the 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. The 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.

40. The 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 the Respondent was materially false or inaccurate at the time such information or certification was provided to the EPA.

41. Complainant and the 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

42. 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 fifty-six thousand three hundred and forty dollars (\$56,340.00) is an appropriate civil penalty to settle this action.

43. The 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, certified check, or wire transfer, payable to the order of "Treasurer, United States of America." Wire transfer shall be in accordance with Attachment A of this CA/FO. Additional information can be found at <https://www.epa.gov/financial/makepayment>. The check shall reference on its face the name of the 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

44. At the time of payment, the Respondent shall send notice of payment, including a separate copy of the check (if payment has been made by 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
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

and

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

45. The penalty amount specified above shall represent civil penalties assessed by the EPA and shall not be deductible for purposes of federal taxes.

46. 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

47. This CA/FO shall not relieve the 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.

48. Issuance of this CA/FO shall not be deemed as prohibiting, altering, or in any way limiting the ability of the EPA to pursue any other enforcement actions available to it under law. Such actions may include any administrative, civil, or criminal action to seek injunctive or other appropriate relief, or to initiate an action for imminent and substantial endangerment, under the CWA or any other federal or state statute, regulation, or permit.

49. This CA/FO constitutes a settlement by Complainant and the Respondent of all claims for civil penalties pursuant to the CWA with respect to only those violations alleged in this CA/FO. Except as expressly set forth herein, compliance with this CA/FO shall resolve the allegations of violations contained herein.

50. Nothing in this CA/FO is intended to nor shall be construed to operate in any way to resolve any criminal or other liability of the Respondent resulting from violations that were not alleged in this CA/FO.

51. 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.

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

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

54. Each party shall bear its own costs and attorney's fees in connection with the action resolved by this CA/FO.

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

For Complainant:

Paul Schwartz
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960
(404) 562-9576

For Respondent:

Lucy Sheftall
Assistant City Attorney
P.O. Box 1340
Columbus, GA 31902
(706)653-4025

56. 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 proposed CA/FO based on comments received during the public comment period.

57. 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 Georgia was provided a prior opportunity to consult with Complainant regarding this matter.

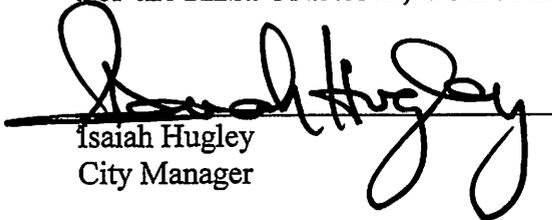
58. Effective upon signature of this CA/FO by the Respondent, the Respondent agrees that the time period commencing on the date of its signature and ending on the date the EPA receives from the Respondent the payment required by this CA/FO shall not be included in computing the running of any statute 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, the 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 the EPA gives notice to the 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 the EPA.

VI. Effective Date

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

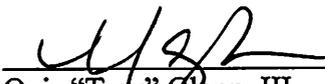
AGREED AND CONSENTED TO:

For the RESPONDENT, COLUMBUS CONSOLIDATED GOVERNMENT:


Isaiah Hugley
City Manager

Date: 10/5/18

For COMPLAINANT, U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 4:


~~Onis "Trey" Glenn, III~~ *Mary S. Walker*
Acting Regional Administrator

Date: DEC - 7 2018

ATTACHMENT A

COLLECTION INFORMATION

WIRE TRANSFERS:

Wire transfers should be directed to the Federal Reserve Bank of New York

Federal Reserve Bank of New York

ABA = 021030004

Account = 68010727

SWIFT address = FRNYUS33

33 Liberty Street

New York NY 10045

Field Tag 4200 of the Fedwire message should read "D 68010727 Environmental Protection Agency"

OVERNIGHT MAIL:

U.S. Bank

1005 Convention Plaza

Mail Station SL-MO-C2GL

St. Louis, MO 63101

Contact: Natalie Pearson

314-418-4087

ACH (also known as REX or remittance express):

Automated Clearinghouse (ACH) for receiving US currency

PNC Bank

808 17th Street, NW

Washington, DC 20074

Contact – Jesse White 301-387-6548

ABA = 051036706

Transaction Code 22 - checking

Environmental Protection Agency

Account 310006

CTX Format

ON LINE PAYMENT:

There is now an On Line Payment Option, available through the Dept. of Treasury.

This payment option can be accessed from the information below:

WWW.PAY.GOV (Enter sfo 1.1 in the search field Open form and complete required fields).

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4

IN THE MATTER OF:)
)
COLUMBUS CONSOLIDATED) CONSENT AGREEMENT AND
GOVERNMENT) FINAL ORDER
)
COLUMBUS, MUSCOGEE COUNTY,)
GEORGIA)
)
RESPONDENT.) DOCKET NO. CWA-04-2018-4500(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*, including Subpart I, 40 C.F.R. Part 22, and authorities delegated to me, the foregoing 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), the Respondent is hereby ordered to comply with the terms of the foregoing Consent Agreement.

U.S. ENVIRONMENTAL PROTECTION AGENCY

Date: DEC - 7 2018


~~Glenn, III~~ Mary S. Walker
Acting Regional Administrator

CERTIFICATE OF SERVICE

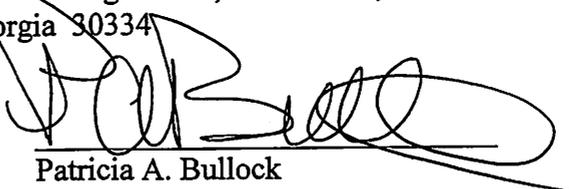
The undersigned certifies that a true and correct copy of the attached **CONSENT AGREEMENT AND FINAL ORDER** in the matter of Columbus Consolidated Government, Docket No. CWA-04-2018-4500(b) (filed with the Regional Hearing Clerk on 12, 13, 2018) was served on 12, 13, 2018, in the manner specified to each of the persons listed below.

By hand-delivery: Paul Schwartz
Associate Regional Counsel
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303-8960

By certified mail, return receipt requested:

Lucy Sheftall
Assistant City Attorney
P.O. Box 1340
Columbus, GA 31902

Anna Truszczynski, Manager
Nonpoint Source Program
ATTN: Cameron Wolfe, Unit Manager
Stormwater Unit
Georgia Environmental Protection Division
Watershed Protection Branch
2 Martin Luther King Dr. SE, East Tower, Suite 1462
Atlanta, Georgia 30334


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