

September 12, 2023
REQUEST FOR QUALIFICATIONS
CITY OF WALHALLA
WATER AND SEWER INFRASTRUCTURE IMPROVEMENTS
ENGINEERING SERVICES
SCIIP Grant #A-23-C202
City of Walhalla RFQ # 001

DUE DATE:
2:00 PM October 27, 2023

RECEIPT LOCATION:
206 N. Church St
PO Box 1099
Walhalla, SC 29691

OFFICIAL CONTACT:
Scott Parris, Utilities Director
(864) 638-4343
sparris@cityofwalhalla.com

City of Walhalla reserves the right to reject any and all submissions or any parts thereof and to waive any irregularities or minor informalities in any submission or in the procurement process and to make a contract award in the best interest of the City of Walhalla.

This project is being funded in whole or in part by the South Carolina Infrastructure Investment Program (SCIIP), which is administered by the South Carolina Rural Infrastructure Authority (RIA) and funded by federal State and Local Fiscal Recovery Funds (SLFRF) through the American Rescue Plan Act (ARPA). All federal SLFRF requirements and SCIIP requirements will apply to the contract. All contractors and subcontractors are required to be registered in the federal System for Award Management (SAM) and may not be debarred from doing business with the federal government. Respondents on this work will be required to comply with all applicable federal regulations, including those listed in Exhibit A.

1. INTRODUCTION

City of Walhalla is issuing this Request for Qualifications (RFQ) to identify a qualified civil engineer to provide a full range of engineering services to support the implementation of the Water and Sewer Infrastructure Improvements. These services will be provided under contract with the City of Walhalla, with funding provided by the South Carolina Rural Infrastructure Authority (RIA) through the South Carolina Infrastructure Investment Program (SCIIP) under SCIIP Grant #A-23-C202

1.1. Method of Procurement

This is a qualifications-based selection. Award will be given to the most responsible, responsive and most highly-qualified engineering firm based on the factors outlined in Section 5, SELECTION CRITERIA. Cost is NOT a factor in the ranking of firms to provide services herein. DO NOT include any reference to consultant costs in the RFQ response. Any RFQ response with any discussion of cost will be disqualified. Contract fees will be negotiated after selection based on the project scope. A general scope of work is outlined below.

Firms are advised that this evaluation and selection process is a competition and not simply a prequalification. It is the intent of the City of Walhalla to award the contract to a single Firm.

1.2. Project Description

The SCIIP funding will be used to rehabilitate aging water and sewer infrastructure, along with a booster pump station upgrade.

The application for SCIIP funding, which includes a detailed project description as well as preliminary engineering information, can be found on the City's web page, www.cityofwalhalla.com

1.3. Engineering Scope of Work

To support this project, the City of Walhalla is requesting full engineering services to include the following scope of work:

- Preparing technical drawings and specifications
- Filing applications for permits and/or design approvals
- Revising drawings in response to directives from governmental authorities as needed
- Preparing bidding documents and revising as needed
- Bidding the project and negotiating with contractors
- Compiling contract documents and participating in the pre-construction conference
- Construction observation and inspection
- Preparing pay requests
- Conducting final inspection and providing a notice stating that the work is acceptable
- Preparation and/or submittal of contractor prepared final as built drawings

1.4. Project Schedule

The estimated project schedule is as follows:

Completion of final design	May 2024
Acquisition of all permits	July 2024
Advertise for bids	August 2024
Construction notice to proceed date	September 2024
Completion of construction	April 2026
Grant close-out	June 1, 2026

Timely completion of the project is a key requirement, as delays could result in the loss of grant funding.

2. REQUEST FOR QUALIFICATIONS (RFQ) PROCESS AND POLICIES

2.1. Submittal of Statements of Qualifications

The City of Walhalla is hereby issuing this Request for Qualifications (RFQ) to engineering firms that have the capability and interest in undertaking and performing the scope of work described in this RFQ. The RFQ will be publicly advertised in accordance with the SCIP procurement guidelines.

The OFFICIAL CONTACT for this solicitation is:

Scott Parris
Utilities Director
City of Walhalla
(864) 638-4343
sparris@cityofwalhalla.com

Each firm responding to this solicitation is officially a RESPONDENT. Each respondent must submit a sealed package containing an original and 4 copies plus one (1) digital copy of its statement of qualifications to Scott Parris at the address above no later than **2:00 PM October 27, 2023**. Statements of qualifications may be submitted in person, by messenger, or by regular mail. All submissions will be logged in and date and time stamped. **Any qualifications package that is received after the date and time specified will be logged and date and time stamped as "late" and returned unopened to the respondent.**

2.2. Proposed Procurement Timeline

Release date for RFQ	October 10, 2023
Final Date to Receive Written Questions/Clarifications	October 25, 2023
RFQ Closing Date	October 27, 2023
Completion of Selection Committee Review and Recommendation	November 1, 2023 estimated
Execution of Contract	January 2024, estimated

2.3. Labeling of Submissions

All submissions must be submitted in a sealed envelope or package plainly marked "City of Walhalla – Water and Sewer Infrastructure Improvements, ATTN: Scott Parris" with the name and address of the respondent in the upper left-hand corner. No responsibility will attach to the City of Walhalla or any official or employee thereof, for the pre-opening, post opening, or failure to open a submission not properly addressed and identified.

2.4. Proprietary/Confidential Information

All materials and written qualifications submitted pursuant to this RFQ shall become the property of the City of Walhalla and will not be returned. All respondents must visibly mark as "CONFIDENTIAL" each part of their submission that they consider to contain proprietary information the release of which would constitute an unreasonable invasion of privacy. All unmarked pages will be subject to release in accordance with law. Marked pages will not be disclosed if they are deemed to meet the requirements under the South Carolina Freedom of Information Act, S.C. Code Section 30-4-10, *et seq.* Respondents should be prepared, upon request, to provide justification of why such materials should not be disclosed in accordance with the South Carolina Freedom of Information Act.

2.5. Questions/Requests for Clarification

All questions and/or requests for clarification regarding this RFQ should be provided in writing to Scott Parris no later than 2:00 PM October, 25, 2023. All questions submitted and their answers will be posted on the City of Walhalla website as an addendum to this RFQ. No telephone inquiries will be accepted.

2.6. Addenda

If it becomes necessary to revise any part of this RFQ, a written addendum will be issued. All addenda issued by City of Walhalla will become part of the official RFQ and will be posted on the City of Walhalla website, www.cityofwalhalla.com. Receipt of all addenda must be acknowledged in the response to this RFQ.

2.7. Contact Policy

No direct or indirect contact regarding this solicitation may be made with any representatives of the City of Walhalla other than the official contact identified in this RFQ. If such contact is made, the City of Walhalla reserves the right to reject a submission by that respondent. All questions and/or requests for clarification must be provided in accordance with Section 2.5 of the RFQ. This contact policy applies to site visits and requests for technical information. Any technical information needed from the City of Walhalla to prepare a submission should be coordinated through the Questions/Requests for Clarification process outlined in Section 2.4.

2.8. Acceptance and Rejection of Submissions

Any submissions that do not conform to the essential requirements of the RFQ shall be rejected. The City of Walhalla reserves the right to waive informalities and minor irregularities in submittals and reserves the sole right to determine what constitutes informalities and minor irregularities. The City of Walhalla also reserves the right to accept or reject any or all submissions received in response to this RFQ. The City of Walhalla is not obligated to enter into any contract on the basis of any submittal in response to this RFQ. The City of Walhalla reserves the right to request additional information from any firm submitting under this RFQ if such information is necessary to clarify the submission.

2.9. Cancellation/Rejection

The City of Walhalla may cancel this RFQ in whole or in part at any time if it is determined to be in the best interest of the City of Walhalla. The City of Walhalla may reject any or all submissions in whole or in part if it is determined to be in the best interest of the City of Walhalla.

2.10. Conflict of Interest

Respondents shall promptly notify the City of Walhalla in writing of all potential conflicts of interest for any prospective business association, interest, or other circumstance, which may influence or appear to influence the respondent's judgment or quality of services being provided hereunder. Such written notification shall identify the prospective business association, interest, or circumstance, the nature of work that such a person may undertake, and request an opinion of the City of Walhalla as to whether the association, interest, or circumstance would, in the opinion of the City of Walhalla, constitute a conflict of interest. By responding to this solicitation, the respondent certifies that it has no conflict of interest with any employee, agent, elected official or officer of the City of Walhalla or any other conflict as may be set forth herein.

2.11. Collusion

More than one submission from an individual, firm partnership, corporation, association or related parties under the same or different will not be considered. If the City of Walhalla believes that collusion exists among respondents, all submissions from the suspected firms will be rejected. "Related parties" means respondents or the principals thereof, which have a direct or indirect ownership or profit-sharing interest in another respondent.

Respondents shall comply with all local, state, and federal directives, orders, and laws applicable to this

RFQ and any resulting contract.

By responding to this RFQ, respondents certify that the response is made without previous understanding, agreement, or connection with any person, firm or corporation making a submission for the same item, and they certify the knowledge that this would constitute an illegal action.

2.12. South Carolina Infrastructure Investment Program (SCIIP) Requirements

This project is being funded in whole or in part by the South Carolina Infrastructure Investment Program (SCIIP), which is administered by the South Carolina Rural Infrastructure Authority (RIA) and funded by federal State and Local Fiscal Recovery Funds (SLFRF) through the American Rescue Plan Act (ARPA). All federal SLFRF requirements and SCIIP requirements will apply to the contract. All contractors and subcontractors are required to be registered in the federal System for Award Management (SAM) and may not be debarred from doing business with the federal government. The successful respondent will be required to comply with all applicable federal regulations, including those outlined in Exhibit A. More information about program requirements can be found in the SCIIP Project Management Procedures found at ria.sc.gov/resources/forms-documents.

3. STATEMENT OF QUALIFICATIONS CONTENTS

Respondents interested in providing the services outlined in this RFQ must prepare and submit a statement of qualifications that must not be more than the equivalent of 30 single sided 8 ½ by 11-inch pages in length (not counting the front and back covers, section dividers that contain no information, and any required forms). The submission must include the following, in the order listed:

3.1. Cover Letter

The response should contain a cover letter signed by a person who is authorized to commit the respondent to perform the work described in this RFQ and should identify all subcontractors, materials, and enclosures being forwarded in response to the RFQ.

3.2. Firm Qualifications

Provide relevant information about the firm to include the following:

- Organization/company overview as it relates to the requirements of the RFQ
- Organization/company overview of all sub-contractors as it relates to the requirements of the RFQ
- Number of years the firm has been providing the requested services with a brief description of recently performed projects that indicate the past performance and abilities of the proposed team. More detail on specific projects should be included in the Relevant Experience section.

3.3. Key Personnel

Provide a proposed project management structure that identifies the project manager and all personnel who will be assigned to work on this project, including a description of their abilities, qualifications (including education and licensure), and experience. Identify the proposed project manager who will be the sole point of contact for the City of Walhalla during day-to-day operations and include their contact information. Include resumes for all key individuals (including sub-consultants) who will be completing a portion of the scope of work.

3.4. Relevant Experience

Provide descriptions of similar infrastructure projects that the organization and/or key personnel have completed, including tasks involved, timeframes, and outcomes. Include any relevant experience with federal requirements or grant-funded projects and/or experience with the water and sewer infrastructure to be improved. Also include any relevant work performed in a nearby jurisdiction or in the City of Walhalla's jurisdiction.

3.5. Firm Workload

Describe the recent, current, and projected workload of the respondent and any sub-consultants, related to how it might impact the respondent's ability to meet the project's schedule requirements.

3.6. References

Provide three (3) client references for relevant projects within the last 5 years that indicate the past performances and abilities of the proposed team. Include a key client contact person for each project with their current daytime phone number and email address.

4. EVALUATION AND AWARD PROCESS

4.1. Selection Committee

The City of Walhalla will conduct a formal selection process to determine the best qualified respondent. This process will include the formation of a selection committee and the appointment of other technical advisors as needed to review all of the submissions and score them based on the established selection criteria outlined herein. The award will be made to the highest rated and ranked respondent based on the cumulative scores of the selection committee.

The City of Walhalla reserves the right to contact a firm to obtain written clarification of information submitted and to contact references to obtain information regarding performance, reliability, and integrity. After evaluating the submitted Statements of Qualifications, the selection committee may choose to interview a short list of at least three firms prior to ranking the respondents. If interviews will be conducted, short-listed respondents will be notified at least ten (10) business days prior to the interview date.

4.2. Notice of Intent to Award

The selection committee's recommendation for award will be presented to the City of Walhalla's council

for consideration. If approved, a notice of "Intent to Award" will be posted on the City of Walhalla website. A notice will also be emailed to all respondents informing them of the committee's recommendation.

4.3. Protested Solicitations and Awards

Any respondent who is aggrieved in connection with the solicitation or award of a contract may protest according to the procedures in the City of Walhalla's procurement policy.

4.4. Contract Negotiations/ Award of Contract

After the close of the appeal period, if no appeals were received or successfully granted, the highest rated respondent identified in the "Intent to Award" will be invited to enter into contract negotiations with City of Walhalla to finalize the scope of work, personnel, hours, hourly rates, use of sub-consultants, and other direct costs that will be required to complete the agreement between the City of Walhalla and the selected respondent. If an agreement cannot be reached with the top ranked firm, the City of Walhalla will select the next highest ranked responsive and qualified firm and the negotiation phase will be repeated. This process will continue until an agreement is reached with a qualified firm that can provide the required scope of services within the project budget. Any contracts awarded as a result of this procurement process will be between the respondent and the City of Walhalla.

Per RIA SCIIP guidelines, any contract negotiated as a result of this procurement process will require approval from RIA prior to award/execution. Once a draft contract is negotiated, the City of Walhalla will submit it to RIA for approval. Once approval is granted, the City of Walhalla and the selected respondent may enter into the contract. Failure to adhere to this policy could result in disallowed grant costs and the cancellation of this solicitation.

5. SELECTION CRITERIA

The selection criteria and their relative importance in making the selection are:

5.1. Qualifications of Firm/Personnel (20%)

Technical expertise and competence, including education, registration, and years of experience of individuals who will be assigned to this project.

5.2. Related Experience on Similar Projects (30%)

Extent of relevant experience with infrastructure projects of a similar nature, including experience with federally-funded grants and/or RIA state-funded grants.

5.3. Past Performance (20%)

Performance recommendations with regard to work quality, schedule, budget, communication and coordination of projects.

5.4. Recent, Current, and Projected Workload (15%)

Workload of the firm and key personnel, related to how it might impact the respondent's ability to meet the project's schedule requirements.

5.5. Proximity and Local Knowledge (15%)

Proximity to the project location and knowledge of the area and the infrastructure to be improved, as demonstrated through relevant experience.

EXHIBIT A

Terms and Conditions for SCIIP-Funded Professional Services Contracts

The following terms and conditions will be incorporated into the contract for this work:

1. Termination for Cause and Convenience

The contract may be terminated in whole or in part as follows:

- i. By the Grantee, if a contractor fails to comply with the terms and conditions of the SCIIP award;
- ii. By the Grantee, to the greatest extent authorized by law, if an award no longer effectuates the program goals or agency priorities;
- iii. By the Grantee with the consent of the contractor, in which case the two parties must agree upon the termination conditions, including the effective date and, in the case of partial termination, the portion to be terminated;
- iv. By the Grantee upon written notification setting forth the reasons for such termination, the effective date, and, in the case of partial termination, the portion to be terminated. However, if the Grantee determines in the case of partial termination that the reduced or modified portion of the contract will not accomplish the purposes for which the contract was made, the Grantee may terminate the contract in its entirety; or
- v. By the Grantee pursuant to termination provisions included in the SCIIP award.

2. Administrative, Contractual, and Legal Remedies¹

In addition to any of the remedies described elsewhere in the contract, if the contractor materially fails to comply with the terms and conditions of this contract, including any federal or state statutes, rules or regulations, applicable to this contract, RIA or the Grantee may take one or more of the following actions:

- i. Temporarily withhold payments pending correction of the deficiency by the contractor;
- ii. Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance;
- iii. Wholly or partly suspend or terminate this Contract; and
- iv. Take other remedies that may be legally available.

The remedies identified above, do not preclude the contractor from being subject to debarment and

¹ This provision is required only for contracts in excess of \$150,000.

suspension under Presidential Executive Orders 12549 and 12689. The Grantee shall have the right to demand a refund, either in whole or part, of the funds provided to the contractor for noncompliance with the terms of this Contract.

3. Equal Opportunity Clause

During the performance of this contract, the contractor agrees as follows:

- i. The contractor will not discriminate against any employee or applicant for employment because of race, color, religion, sex, sexual orientation, gender identity, or national origin. The Contractor will take affirmative action to ensure that applicants are employed, and that employees are treated during employment without regard to their race, color, religion, sex, sexual orientation, gender identity, or national origin. Such action shall include, but not be limited to the following:
 - a. Employment, upgrading, demotion, or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation; and selection for training, including apprenticeship. The contractor agrees to post in conspicuous places, available to employees and applicants for employment, notices to be provided setting forth the provisions of this nondiscrimination clause. The contractor will, in all solicitations or advertisements for employees placed by or on behalf of the contractor, state that all qualified applicants will receive consideration for employment without regard to race, color, religion, sex, sexual orientation, gender identity, or national origin.
- ii. The contractor will not discharge or in any other manner discriminate against any employee or applicant for employment because such employee or applicant has inquired about, discussed, or disclosed the compensation of the employee or applicant or another employee or applicant. This provision shall not apply to instances in which an employee who has access to the compensation information of other employees or applicants as a part of such employee's essential job functions discloses the compensation of such other employees or applicants to individuals who do not otherwise have access to such information, unless such disclosure is in response to a formal complaint or charge, in furtherance of an investigation, proceeding, hearing, or action, including an investigation conducted by the employer, or is consistent with the contractor's legal duty to furnish information.
- iii. The contractor will send to each labor union or representative of workers with which he has a collective bargaining contract or other contract or understanding, a notice to be provided advising the said labor union or workers' representatives of the contractor's commitments under this section, and shall post copies of the notice in conspicuous places available to employees and applicants for employment.
- iv. The contractor will comply with all provisions of Executive Order 11246 of September 24, 1965, and of the rules, regulations, and relevant orders of the Secretary of Labor.

- v. The contractor will furnish all information and reports required by Executive Order 11246 of September 24, 1965, and by rules, regulations, and orders of the Secretary of Labor, or pursuant thereto, and will permit access to his books, records, and accounts by the administering agency and the Secretary of Labor for purposes of investigation to ascertain compliance with such rules, regulations, and orders.
- vi. In the event of the contractor's noncompliance with the nondiscrimination clauses of this contract or with any of the said rules, regulations, or orders, this contract may be canceled, terminated, or suspended in whole or in part and the contractor may be declared ineligible for further Government contracts or federally assisted construction contracts in accordance with procedures authorized in Executive Order 11246 of September 24, 1965, and such other sanctions may be imposed and remedies invoked as provided in Executive Order 11246 of September 24, 1965, or by rule, regulation, or order of the Secretary of Labor, or as otherwise provided by law.

4. Debarment and Suspension (Executive Orders 12549 and 12689)

- i. The Contractor certifies that it is not listed on the government-wide exclusions in SAM, in accordance with the OMB guidelines at 2 CFR 180 and 2 CF 1200 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension."

Project Narrative

WATER AND SEWER INFRASTRUCTURE IMPROVEMENTS

Walhalla, South Carolina

for

City of Walhalla

September 2022



Prepared By

GMC

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GMC PROJECT NUMBER: CGRE220034

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1 INTRODUCTION

This project narrative has been prepared by Goodwyn Mills Cawood (GMC) on behalf of the City of Walhalla (City) to support an application for funding under the South Carolina Infrastructure Investment Program (SCIIP). This Project Narrative is included as **Attachment 1** to the SCIIP Grant Application. Application attachments include:

- **Attachment 1 – Project Narrative (this document)**
- Attachment 2 – Cost Estimates
- Attachment 3 – Project Maps
- Attachment 4 – Funding and Other Commitments
- Attachment 5 – Viability Self-Assessment for RIA State Grant Requests

The City is located in Northwest Oconee County, South Carolina. The City owns and operates a sewer collection system that conveys sewer flow to Oconee Joint Regional Sewer Authority (OJRSA) for treatment as well as a drinking water treatment facility and distribution system. See a regional map showing the City of Walhalla and its water and sewer infrastructure, including connections to OJRSA in **SCIIP Application Attachment 3**. The City's sewer system serves approximately 2,800 acres in and around the City of Walhalla. The sewer system includes approximately 42 miles of gravity sewer and approximately 860 manholes. The gravity sewer drains to three distinct OJRSA Basins: Cane Creek; Flat Rock Pump Station; and Coneross Creek.

In addition to the sewer system, the City maintains a water treatment plant and a distribution system that serves approximately 2,000 customers inside the City Limits and 5,000 customers outside the City. Based on available information, the City created a water system in the early 1900's and is still utilizing much of the infrastructure today, especially in the City.

Like many municipalities and utilities across the country, the City has started to address the growing needs of their water and wastewater system. The City has been working to address the aging systems. In the past 5 years, the City has completed the following projects:

Sewer

- Survey of all manholes and GIS map development
- Cane Creek Sewer Rehabilitation – Phase I
- Cleaning and CCTV of Cane Creek, Flat Rock, and Coneross Trunk Sewers
- Sewer System Consent Order Response, including:
 - Compliance Attainment Plan (CAP)
 - Capacity, Management, Operation & Maintenance Document (CMOM)
 - Preliminary Engineering Report for Sewer Improvements
 - Flow Metering

Water

- New 4.0 MGD Water Treatment Plant
- Asbestos Cement waterline replacement on Melton Drive
- Walhalla-Westminster Interconnection
- Pressure Reducing Valve Installation
- Water Meter Changeout
- Stribling Shores Booster Pump Station

In addition to the projects identified above, the City is currently working to replace old PVC and Asbestos Cement pipe along Highway 11 to alleviate an area that is prone to excessive line breaks. The City has also identified the replacement of the Rocky Knoll hydropneumatic tank as a high priority due to the lack of redundancy and limited fire flow.

Due to the amount of work needed, a phased approach to a comprehensive sanitary sewer evaluation survey (SSES) and sanitary sewer rehabilitation. Beginning in 2018, the City began an effort to survey all manholes within the collection system to develop an up-to-date map of their collection system. In conjunction with development of a system map, the City completed phase 1 rehabilitation of the Cane Creek Trunk sewer and cleaning and CCTV survey of all three major trunk lines owned by the City.

The proposed waterline replacement project will address the replacement of 14,600 LF of distribution piping while the Cane Creek, Flat Rock, and Coneross Sewer Rehabilitation Projects will address 21,100 linear feet of trunk sewer.

2 NEED FOR THE PROJECT

A map of the proposed projects are included in **SCIIP Application Attachment 3**.

Sewer

Based on deficiencies identified in the collection system, in conjunction with sanitary sewer overflows (SSOs) in the OJRSA collection system, the City of Walhalla and the South Carolina Department of Health and Environmental Control (SCDHEC) executed a consent order in January 2021. A copy of the 2021 Consent Order can be found the Compliance Attainment Plan (CAP), **Appendix A** to this project narrative.

In response to the Consent Order, the City has completed a CAP, a Capacity-Management-Operations-Maintenance (CMOM), and a Preliminary Engineering Report documenting the deficiencies and proposed path forward. A copy of the CAP is included in Project Narrative **Appendix A**. To date, all of the deficiencies at city-owned pump stations have been addressed, allowing the City to focus on additional rehabilitation of their gravity sewer. The City is seeking funding via the SCIIP program to help execute its CAP, complete gravity sewer rehabilitation, and further reduce SSOs.

In addition to the consent order, in January 2020, representatives from Clemson University conducted a study and produced a revised report titled *Cane Creek and Little Cane Creek Watershed Management Plan to Address E. Coli Impairment, Oconee County, SC*. The report cites that the Cane and Little Cane Creek have been on the South Carolina 303(d) list of impaired waterbodies since 1998. The reports states, during the assessment period of 1998-2002, 29% of samples from Cane Creek, and 52% of samples from Little Cane Creek violated the fecal coliform standard. The report also cites I&I resulting in observed SSOs within the City of Walhalla's collections system. The SSOs are contributing to the contamination issue in the watershed.

To date the City has performed SSES and rehabilitation work described in Section 1 of this Project Narrative. Additional funding will allow the City to continue to address deficiencies that contribute to SSOs and water quality impairments.

Water

There are two projects proposed for the Walhalla water system. The first project is the proposed waterline replacement which includes multiple City blocks downtown, bounded by West Main Street and West North Broad Street and Smith Street and Walnut Street to the west and east. This area of the distribution system is some of the oldest in the City, with records indicating that the pipe was installed as early as 1922 and consists of cast iron and galvanized pipe. The cast iron pipe ranges in size from 8-inches to 10-inches, while the galvanized consists of mostly 1.5-inch and 2-inch dead end lines. Many of the joints utilize lead joints and service connections are made with goose necks that are believed to contain lead.

While the City utilizes a corrosion inhibitor at their water treatment plant, the interior of the cast iron and galvanized pipe is tuberculated and believed to precipitate lead and copper into the water system. While all samples for lead and copper have been below any action level, the City would like to be proactive in replacing the waterlines in this area of downtown.

The second project includes the replacement of the existing 6,000 gallon Rocky Knoll hydropneumatics tank. The Rocky Knoll hydropneumatics tank was purchased used from another municipality in the 1980's and installed on the west end of the City to provide adequate pressure to Highway 28, Lake Jemiki Road, Playground Road, Rocky Knoll Road, and other small roads in the area. In total, approximately 200 homes are dependent on the small, aging hydropneumatic tank to maintain system pressures. Over the years, the service area has grown, placing an increased strain on the small hydropneumatics tank, resulting in increased wear and tear and low pressure issues on the suction piping. Reliability at the station is compounded by the amount of power outages that the station experiences, with outage events lasting over one day. The limited capacity of the hydropneumatic tank results in low pressure/water outages for many customers. The existing configuration needs to be improved to provide a more reliable and sustainable water system.

3 PROJECT DESCRIPTION

Sewer

The scope of work for this portion of the project is to address the most vulnerable and highest risk portion of the system first. The trunk line is the lowest lying portion of the basin, includes the largest pipe, and carries the most flow. Due to its elevation and proximity to water ways, the trunk portion of the sewer is particularly susceptible to inflow from flood waters as well as groundwater infiltration. In accordance with the CAP, the proposed project will address the highest priority portions of the Cane Creek, Flat Rock, and Coneross trunk sewers.

The project will prioritize work in the following order:

- 1) Rehabilitation of failing aerial crossings
- 2) Raising and Rehabilitation of manholes in or near flood prone areas
- 3) Rehabilitation of aging gravity sewer by cured in place lining

Water

The scope of work for the waterline replacement project is to address the old water lines and service lines in a portion of the downtown area. This area of town consists of some of the oldest pipe on record with the City. Replacing the old cast iron and galvanized pipe will help the City improve the water quality for their customers by eliminating dead end lines and removing pipe/services that contains lead, improve reliability, and improve system capacity by removing tuberculated pipe that restricts the flow of water.

The scope of work for the Rocky Knoll Booster Pump Station includes the installation of a new vertical-turbine booster pump station, backup generator, SCADA, approximately 6,800 LF of 10-inch waterline, demolition of the existing facilities, and other related appurtenances. The new pump station will be capable of providing fire flow to the service area, a capability that doesn't currently exist in the current configuration. In addition, the new waterline will reduce headloss on the suction side of the pump station, helping increase discharge pressures but also limiting the pressure fluctuations customers on the suction side experience. The City has experience with vertical-turbine pump stations, having installed one to address a similar issue on Stribling Shoals Road.

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4 FEASIBILITY

The feasibility of this project was evaluated by looking at three alternatives and evaluating their benefits and impacts to the sewer and water system based upon monetary and non-monetary factors as discussed below. The water system has no alternatives. The pipe has reached the end of its useful life and is now a culprit for poor water quality.

4.1 Sewer Improvements

4.1.1 Alternative #1 – Rehabilitation of Sewer (Selected alternative)

Alternative #1 consists of the use of cured-in-place pipe (CIPP) to rehabilitate the existing gravity sewer. The CIPP method allows the City to reduce I&I, provide increased structural stability to the host pipe, and not require additional easements. Bypass pumping will still be required to complete construction.

4.1.2 Alternative #2 – Open-cut Replacement of Sewer

Alternative #2 includes the open-cut replacement of the gravity sewer that is in need of repair. This option will address the structural condition of the existing pipe as well as improve I&I. Construction of a new gravity sewer will require bypass pumping and potentially construction easements. Since the existing gravity sewer has adequate capacity, open-cut replacement offers little benefit.

4.1.3 Do Nothing

Alternative #2 is to make no improvements to the sewer or water system. This alternative would result in continued deterioration of pipe, no reduction in I&I, and no improvements to drinking water quality in the downtown area. This alternative is not feasible.

4.2 Water Improvements

As stated earlier, the only way to address the aging drinking water system is with pipe replacement. A “do nothing” alternative was also considered, however, if no action is taken, the City will have to continue to take a reactive approach to system failures and performance issues. A reactive approach is not considered a reasonable alternative.

4.2.1 Alternative #1 – Rehabilitation/Replacement of Hydropneumatic Tank

Alternative #1 includes the rehabilitation or replacement of the existing hydropneumatic tank. While this alternative may help with reliability associated with equipment failures, it does not address the low suction pressures, limited storage volume, or lack of fire flow.

4.2.2 Alternative #2 – Install Booster Pump Station & Appurtenances

Alternative #2 includes the installation of a new BPS, suction piping, and backup generator, allowing the City to reliably improve pressures on both the suction and discharge side of the pump station,

while also providing increased capacity to the system, providing fire protection in an area that historically has not had coverage.

4.2.3 Do Nothing

Alternative #3 is to make no improvements to the Rocky Knoll system. This alternative would result in continued deterioration of the hydropneumatic tank and increased instances where customers are without adequate pressure or flow. This alternative is not feasible.

4.3 Construction Cost Opinions

Detailed opinions of probable construction costs for all projects have been developed and are included in **SCIIP Application Attachment 2**. A summary of the estimates is also included below.

Table 4-1. Construction Cost Summary	
Subtotal Waterline Replacement	\$2,763,000
Subtotal Rocky Knoll BPS	\$1,439,000
Subtotal Cane Creek Gravity Sewer Rehab	\$2,767,500
Subtotal Flat Rock Gravity Sewer Rehab	\$1,205,000
Subtotal Coneross Gravity Sewer Rehab	\$1,259,000
Subtotal	\$9,433,500
25% Contingency	\$2,359,000
Total	\$11,792,500

The City of Walhalla is providing the required 15% local investment match from local funds and a requested \$500,000 RIA grant. A letter of commitment is included in **SCIIP Application Attachment 4**. The utility viability assessment to support RIA match funding is included in **SCIIP Application Attachment 5**.

4.4 Project Schedule

This project must be completed by the federal expenditure deadline of December 2026. In order to accomplish this, a realistic project schedule has been developed. Further, specific schedule impacts have been anticipated and mitigations planned. An anticipated project Milestone schedule is provided below:

Table 4-2: Milestone Schedule		
Milestone	Duration	Date
SCIIP Application Deadline	---	9/12/2022
Grant Award (1 st qtr 2023)	6 Months	3/31/2023
Property Acquisition	N/A	---
Design	9 Months	12/31/2023
Permitting	2 Months	2/28/2024
Advertise for Bids	1 Month	3/31/2024
Award and Contracting	2 Months	5/31/2024
Notice To Proceed	1 Month	6/30/2024
Substantial Completion	18 months	12/31/2025
Final Completion	1 Month	1/31/2026
Project Closeout	1 Month	2/28/2026
Federal Expenditure Deadline	---	12/31/2026

Factors which may impact schedule are:

Table 4-3: Schedule Impacts & Mitigation	
Potential Impact	Mitigation
Supply Chain Delays	Flexibility in material for water: HDPE, PVC
Labor Shortages	Provide longer construction duration to aide with crew availability
Unanticipated Site Conditions	Complete SUE. Site visits. Cleaning and CCTV of sewer

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5 BENEFITS AND IMPACTS

5.1 Regional Solutions

The sewer rehabilitation will help reduce the amount of I&I entering the Walhalla collection system, ultimately reducing the amount of wetweather flow that enters the OJRSA collection system. The City of Walhalla and OJRSA were both placed under a consent order, partially due to issues from I&I. By reducing I&I in Walhalla, OJRSA and the other member cities of Seneca and Westminster benefit from reduced operating costs at the WWTP and reduced risk of sanitary sewer overflows.

5.2 Water Quality

This project addresses water quality in two ways. First, the replacement of 100 year old cast iron and galvanized piping in downtown and the reduction in dead-end lines will improve water quality by removing tuberculated pipe with lead joints and replacing old goose neck services with new materials. Modern materials will allow this investment to serve these residents safely for another 50 years.

Water quality will also be improved in Cane Creek, upstream of Lake Keowee. The sewer along Cane Creek is subject to SSO's during wet weather, resulting in the contamination of Cane Creek, which ultimately connects to Lake Keowee and is the source of the City of Walhalla drinking water. In addition to rehabilitation of the pipe, raising of manholes and the repair of failing aerial crossings will further reduce the potential of SSO's along Cane Creek, improving water quality downstream.

5.3 Resilience and Storm Protection

The raising of manholes and replacement of aerial crossings will provide increased protection against storms. The manholes on the existing gravity sewer are below the floodplain in many locations, making the sewer susceptible to inflow. In addition, the existing aerial crossings are old and have experienced washing around their foundations. Improved material and foundations will ensure the critical aerial crossings are not compromised in a large storm.

5.4 Aging Infrastructure

This project will replace aging infrastructure around the City of Walhalla. Records of the age of the infrastructure is unknown, but some documentation suggests that the water infrastructure was installed in the 1920's. The material used for both the water and sewer system is antiquated and not recognized by the industry as a standard of construction anymore. Modern materials and equipment provide a more efficient, resilient, and reliable system.

5.5 Capacity

The City of Walhalla currently has adequate capacity in their sewer system. Additional sewer capacity is not required at this time.

Replacement of the tuberculated cast iron and galvanized piping in town, in conjunction with the elimination of multiple dead end lines will increase the capacity within the area of interest, resulting in improved water quality and improved fire flows.

The installation of a new Rocky Knoll booster pump station will result in increased capacity within that pressure zone. This increased capacity will allow for continued development in the area, as well as provides fire coverage for a portion of the system that has never been capable of meeting a fire flow demand.

APPENDIX A – SEWER CORRECTIVE ACTION PLAN AND CONSENT ORDER

Compliance Attainment Plan

SEWER COLLECTION SYSTEM COMPLIANCE

Walhalla, South Carolina

for

City of Walhalla

March 2021



Prepared By

GMC

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GMC PROJECT NUMBER: CGRE210004

SCDHEC Consent Order: 20-052-W



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1 INTRODUCTION

On January 6, 2021 the City of Walhalla (City) entered into an agreed upon Consent Order (CO) number 20-052-W with the South Carolina Department of Health and Environmental Control (SCDHEC). The consent order documents the City's violation of the Pollution Control Act, S.C. Code Ann. §§ 48-1-100 (2008 and Supp. 2019) due to failure to properly manage, operate, and maintain all parts of its sewer system. A copy of the consent order is included with this Compliance Attainment Plan (CAP) as Appendix A.

This CAP has been developed in accordance with requirements set forth in the CO. This CAP will outline the City's proposed plan to bring all aspects of the sewer collection system infrastructure, operation, and maintenance into compliance with SCDHEC regulations.

1.1 Findings of Fact as Noted in the Consent Order

The following Findings of Fact are documented in the CO:

- Walhalla owns and is responsible for the proper operation and maintenance of a satellite sewer collection system (collection system), located at 206 North Church Street in Walhalla, Oconee County, South Carolina. The collection system consists of three (3) active pump stations (e.g., Andover, Mountain View, and Pickens Highway) and an estimated 40 miles of collection lines.
- [SCDHEC] issued Permit SSS000064 to Walhalla, authorizing it to collect and send wastewater to the Coneross Creek wastewater treatment plant (WWTP). The WWTP is owned by Oconee Joint Regional Sewer Authority (OJRSA). The effective date of the Permit is January 4, 2012.
- On June 28, 2019, Department staff conducted an inspection of the collection system with a representative of Walhalla present and documented observations. Documented observations are further discussed in Section 3 of this CAP.
- On August 4, 2020, the parties agreed to the issuance of this Order to include the findings above.

1.2 Existing Walhalla Sewer Collection System

The City of Walhalla sewer collection system collects and convey wastewater to the OJRSA WWTP. Maps of the collection system are included with this CAP as Appendix B.

The city's sewer system serves approximately 2,800 acres in and around the City of Walhalla. The sewer system includes approximately 40 miles of gravity sewer and approximately 860 manholes. The gravity sewer drains to three distinct Basins owned and operated by OJRSA: Cane Creek Pump Station; Flat Rock Pump Station; and Coneross Creek Trunk Sewer.

1.3 Purpose

The purpose of this CAP is to address requirements of the CO. During development of this CAP, GMC completed a preliminary audit of the sewer collection system infrastructure, operation, and maintenance and completed gap analyses to determine deficiencies in the areas specifically addressed in the CO. The following sections describe the findings of the audit and gap analysis and proposes corrective actions for all deficiencies identified in the CO. This CAP presents a comprehensive plan and schedule for the City to attain compliance with CO number 20-052-W. This report serves to fulfill the CAP for submission to SCDHEC as ordered, consented to, and agreed upon.

1.4 Document Outline

This document is organized into the following sections:

- Section 1 – Introduction
- Section 2 – Consent Order Requirements
- Section 3 – Deficiencies Analysis and Corrective Action
- Section 4 – Implementation Schedule

2 CONSENT ORDER REQUIREMENTS

This section outlines specific requirements of the CO and addresses actions that have been taken, are in progress, or will be implemented to address the specified requirements.

2.1 Compliance Attainment Plan

2.1.1 Requirement

The Consent Order requires submission of a CAP within 60 days of CO execution.

2.1.2 Resolution

Submission of this CAP to DHEC is intended to meet this requirement.

2.2 Preliminary Engineering Report

2.2.1 Requirement

Within one hundred twenty (120) days of the execution date of this Order, submit to the Department three (3) copies of a Preliminary Engineering Report (PER), prepared by a South Carolina licensed professional engineer, addressing planned improvements to the collection system. The PER shall include but is not limited to:

- A plan for full assessment and evaluation of the entire collection system, including all sewer lines, manholes, pump stations, wet wells, and all associated appurtenances;
- Recommendations for repairs and improvements to the collection system;
- A scope of work;
- A schedule of implementation and completion.

2.2.2 Resolution

The City will work with GMC to develop the PER as described above and submit to SCDHEC in accordance with CO schedule requirements discussed in this CAP.

2.3 Operation and Maintenance Plan

2.3.1 Requirement

Within one hundred eighty (180) days of the execution date of this Order, submit to SCDHEC a notarized document certifying that Walhalla has developed and implemented a written operation/maintenance plan. The implemented plan must contain appropriate elements including but not limited to:

- A current system map;

- Schedule(s) for inspections and/or line cleaning;
- A schedule for equipment testing;
- Methods for addressing system problems (i.e., emergency response methods to include how to repair equipment in a timely fashion and effect needed site cleanup and sanitation).

2.3.2 Resolution

The City is actively working with GMC to develop an Operation & Maintenance Plan. In order to address this requirement, the City will be implementing a Capacity Management Operation and Maintenance (CMOM) program in accordance with United States Environmental Protection Agency (EPA) guidance on CMOM development and implementation.

In accordance with CO requirements this CMOM document will include specific items listed in the CO as well as other CMOM components recommended by EPA. The City will provide a notarized document confirming adoption of the CMOM as specified in the CO and in accordance with the CO compliance schedule discussed in this CAP.

2.4 Pump Station Construction Plans and Specifications

2.4.1 Requirement

Within one hundred twenty (120) days from the Department's approval of the PER, submit to SCDHEC three (3) copies of plans, specifications, an application, and any other necessary documents for a Permit to Construct upgrades to the Andover, Mountain View, and Pickens Highway pump stations necessary to comply with Operating Permit SSS000064. The wastewater construction application package must be administratively and technically complete and prepared in accordance with Standards for Wastewater Facility Construction, S.C. Code Regs. 61-67 (2012 & Supp. 2019). This Consent Order acknowledges that multiple construction projects may be required to address Findings of Fact, and achieve the goals set forth in the PER.

2.4.2 Resolution

The City will work with a South Carolina Licensed Professional Engineer to develop construction plans and specifications for the pump station upgrades identified in the PER. The pump station upgrade project will be completed in accordance with CO schedule requirements as discussed in Section 4 of this CAP.

2.5 Construction of Pump Station Upgrades

2.5.1 Requirement

Within sixty (60) days from the date SCDHEC issues a Construction Permit authorizing construction of the items detailed in the application package required by item 1.b. above, begin construction of all upgrades detailed within such Construction Permit.

Within one hundred eighty (180) days from issuance of the Construction Permit(s), complete all construction activities and request an Approval to Place into Operation the required upgrades from SCDHEC's Upstate Environmental Quality Control Anderson Office.

2.5.2 Resolution

The specifications of the pump station upgrade project will require a 180 day construction period of performance in order to comply with schedule requirements of the CO.

2.6 Quarterly Reporting

2.6.1 Requirement

The consent order acknowledges that multiple construction projects may be required to achieve the goals set forth in the PER required by the CO. The City shall submit progress reports and updates to the CAP / PER to SCDHEC on a quarterly basis. This report shall detail progress relative to the original CAP / PER, summarize work completed in the previous quarterly period, and provide detail of work planned for the upcoming quarterly period.

2.6.2 Resolution

The City will submit quarterly updates to SCDHEC as specified in the CO.

2.7 Termination of Consent Order

2.7.1 Requirement

The consent order shall terminate upon the City:

- Completing repairs/upgrades identified in the CAP;
- Achieving a satisfactory rating from a SCDHEC representative during a collection system inspection; and
- Fulfilling all other requirements detailed within this CO (e.g. payment of assessed penalties, etc.)

2.7.2 Resolution

Through quarterly reporting as required by the CO, the City will document resolutions of all deficiencies described within this CAP. When all CO requirements have been met, the City will request termination of the CO.

2.8 Civil Penalty

2.8.1 Requirement

Within thirty (30) days of the execution date of the CO, pay to SCDHEC a civil penalty in the amount of one thousand four hundred dollars (\$1,400.00).

2.8.2 Resolution

Payment was made on January 25, 2021. This requirement has been met. No further action is required.

3 Deficiencies Analysis and Corrective Action

The CO Findings of Fact include observations documented during a collection system inspection on June 28, 2019 by SCDHEC staff. Deficiencies were noted during this inspection. This section of the CAP acknowledges and presents planned corrective action for each of these deficiencies. The acknowledged deficiencies are related to the following categories:

- Records / Reports / Maps
- Lines and Inflow & Infiltration (I/I) Evaluation
- Sanitary Sewer Overflows (SSO)
- Operation and Maintenance (O&M) / Right of Way
- Fats, Oil, and Grease (FOG) Program / Sewer Use Ordinance
- Pump Station Evaluations
- Manhole Evaluations

Each of the deficiencies noted in the CO are related to one of the categories listed above. Corrective actions for compliance attainment have been identified for each deficiency. Compliance attainment will be achieved through implementation of the corrective actions described in the following sub-sections. Documentation of corrective action will be provided to SCDHEC through delivery of the CO requirements outlined in Section 2 of this CAP. The CO deliverable requirements that will document corrective actions are:

- Corrective Action Plan (CAP) – this document
- Preliminary Engineering Report (PER)
- Operation and Maintenance Plan (O&M Plan)
- Pump Station Construction Project (PS Construction)
- Collection System Rehabilitation Projects (Rehab Projects)
- Quarterly Reporting (QR)

3.1 Records / Reports / Maps

3.1.1 Existing Condition

The findings of fact noted in the CO include the following items related to Records / Reports / Maps:

- The collection system map is over 40 years old
- Records of budget, maintenance, repairs, overflows, taps, work orders, and complaints were not available.
- A list of emergency equipment and 24-hour contacts was not available.

3.1.2 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-1 below summarized the identified gaps.

Table 3-1. Records / Reports / Maps Gap Analysis

Deficiency	Gap Analysis
The collection system map is over 40 years old	At the time of inspection, the City lacked an up-to-date system map complete with geographical coordinates and asset attributes.
Records of budget, maintenance, repairs, overflows, taps, work orders, and complaints were not available.	At the time of inspection, the City did not have documented plans and procedures for record keeping of system operation and maintenance activities.
A list of emergency equipment and 24-hour contacts was not available.	At the time of inspection, the City did not have documented and accessible emergency operation plan that included equipment inventory and 24-hour contacts.

3.1.3 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-2 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-2. Records / Reports / Maps Corrective Actions

Deficiency	Corrective Action	CO Deliverable(s)
The collection system map is over 40 years old	The City initiated a program to comprehensively survey the sewer collection system and generate a computerized geographical information system (GIS) map complete with asset identification and attributes. To date system mapping is approximately 80% complete.	CAP, PER, O&M Plan, QR
Records of budget, maintenance, repairs, overflows, taps, work orders, and complaints were not available.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will identify procedures and a process for recordkeeping that will be adopted by the City.	O&M Plan, QR
A list of emergency equipment and 24-hour contacts was not available.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will include an emergency response plan. The plan will include updated inventories of emergency response equipment and 24-hour contact information.	O&M Plan, QR

3.2 Lines and Inflow & Infiltration (I/I) Evaluation

3.2.1 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-3 below summarized the identified gaps.

Table 3-3. Lines and I/I Evaluation Gap Analysis

Deficiency	Gap Analysis
Regular line evaluation and maintenance records were not available.	At the time of inspection, the City had not implemented a sewer system evaluation survey (SSES) program.
More than thirty (30) manholes did not have risers installed and are subject to being submerged during heavy rains.	At the time of inspection, the City had not implemented a sewer system evaluation survey (SSES) program. Also, the City did not have up-to-date GIS mapping and was not able to efficiently identify and address manholes that are at a high risk of flooding.

3.2.2 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-4 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-4. Lines and I/I Evaluation Corrective Action

Deficiency	Gap Analysis	CO Deliverable(s)
Regular line evaluation and maintenance records were not available.	As a part of the CO response, the City will develop a PER that will include a comprehensive plan for long term system SSES, flow monitoring, and rehabilitation.	PER, QR
More than thirty (30) manholes did not have risers installed and are subject to being submerged during heavy rains.	The City has developed GIS mapping of the system and will continue to refine this map. In addition, the goals of long term SSES and rehabilitation outlined in the PER will include corrective action to address manholes in flood prone areas.	PER, QR

3.3 Sanitary Sewer Overflows (SSO)

3.3.1 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-5 below summarized the identified gaps.

Table 3-5. SSO Gap Analysis

Deficiency	Gap Analysis
Records of SSOs (non-reportable and reportable quantities) were not maintained on site.	At the time of inspection, the City had not implemented a standardized procedure for recording and logging SSOs in the system.

3.3.2 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-6 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-6. SSO Corrective Action

Deficiency	Gap Analysis	CO Deliverable(s)
Records of SSOs (non-reportable and reportable quantities) were not maintained on site.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will identify procedures and process for recordkeeping that will be adopted by the City.	O&M Plan, QR

3.4 Operation and Maintenance (O&M) / Right of Way

3.4.1 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-7 below summarized the identified gaps.

Table 3-7. O&M / Right of Way Gap Analysis

Deficiency	Gap Analysis
A written O&M plan and right of way maintenance program was not available.	At the time of inspection, the City did not have formal programs established or documentation of procedures for system O&M and right of way maintenance.
Pump station inspections were not documented.	At the time of inspection, the City did not have formal programs established or documentation of procedures for pump station inspections.
Schedules for maintenance, cleaning, or inspections were not established.	At the time of inspection, the City had not implemented a sewer system evaluation survey (SSES) program.
Maintenance of sewer lines and right of ways were not documented.	At the time of inspection, the City did not have formal programs established or documentation of procedures for system O&M and right of way maintenance.

3.4.2 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-8 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-8. O&M / Right of Way Corrective Action

Deficiency	Gap Analysis	CO Deliverable(s)
A written O&M plan and right of way maintenance program was not available.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will outline a comprehensive O&M plan and detail right of way maintenance procedures that will be adopted by the City.	O&M Plan, QR
Pump station inspections were not documented.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will outline programs and documentation procedures for pump station inspections.	O&M Plan, QR
Schedules for maintenance, cleaning, or inspections were not established.	As a part of the CO response, the City will develop a PER that will include a comprehensive plan for long term system SSES, flow monitoring, and rehabilitation. Additionally, the CMOM will establish procedures for execution and documentation of SSES activity.	PER, O&M Plan, QR
Maintenance of sewer lines and right of ways were not documented.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will outline programs and documentation procedures for sewer line and right of way inspections.	PER, O&M Plan, QR

3.5 Fats, Oil, and Grease (FOG) Program / Sewer Use Ordinance

3.5.1 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-9 below summarized the identified gaps.

Table 3-9. FOG Program / Sewer Use Ordinance Gap Analysis

Deficiency	Gap Analysis
A FOG program has not been established	At the time of inspection, the City did not have formal a program established to educate and enforce FOG requirements of the OJRSA Sewer Use Ordinance.
The Sewer Use Ordinance developed by OJRSA had been adopted but not enforced due to limited staffing	At the time of inspection, the City had acknowledged and adopted the Sewer Use Ordinance developed by OJRSA, but had not established programs and procedures to ensure its enforcement within the Walhalla Collection System.
A public outreach program had not been established.	At the time of inspection, the City did not have formal a program established to educate and enforce FOG requirements of the OJRSA Sewer Use Ordinance.

3.5.2 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-10 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-10. FOG Program / Sewer Use Ordinance Corrective Action

Deficiency	Gap Analysis	CO Deliverable(s)
A FOG program has not been established	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will outline requirements of a FOG program in accordance with the OJRSA Sewer Use Ordinance.	O&M Plan, QR
The Sewer Use Ordinance developed by OJRSA had been adopted but not enforced due to limited staffing	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will outline requirements of the OJRSA Sewer Use Ordinance and establish a program for implementation of the Ordinance within the Walhalla collection system.	O&M Plan, QR
A public outreach program had not been established.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will include recommendations for a public outreach program regarding FOG and the OJRSA Sewer Use Ordinance.	O&M Plan, QR

3.6 Pump Station Evaluations

3.6.1 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-11 below summarized the identified gaps.

Table 3-11. Pump Station Evaluations Gap Analysis

Deficiency	Gap Analysis
<u>Andover Pump Station</u>	
*The pump station was not fenced.	At the time of inspection, the pump station did not meet all requirements of SCDHEC r61-67.
*A lid over the dry and wet well was not locked.	
*An emergency plan was not available	
*A weather durable sign with a 24-hour emergency number was not present.	
*Routine inspections and performed maintenance were not documented.	
*Wells were not ventilated properly	
*An auxiliary power supply was not available	
*Only a visual alarm was present, lack of auxiliary power prevents alarm in the event of power loss to the station.	
*Pump run times were not recorded to ensure the two pumps operate in lead-lag sequence.	
*The dry well contained grease deposits.	
<u>Mountain View Pump Station</u>	
*The pump station was not fenced.	At the time of inspection, the pump station did not meet all requirements of SCDHEC r61-67.
*An emergency plan was not available	
*A weather durable sign with a 24-hour emergency number was not present.	
*Routine inspections and performed maintenance were not documented.	
*An auxiliary power supply was not available	
*Audio and visual alarm were present, but lack of auxiliary power prevents alarm in the event of power loss to the station.	
*One of two pumps was non-operational.	
<u>Pickens Highway Pump Station</u>	
*Routine inspections and performed maintenance were not documented.	At the time of inspection, the pump station did not meet all requirements of SCDHEC r61-67.

3.6.2 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-12 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-12. Pump Station Evaluations Corrective Action

Deficiency	Gap Analysis	CO Deliverable(s)
<p><u>Andover Pump Station</u></p> <ul style="list-style-type: none"> *The pump station was not fenced. *A lid over the dry and wet well was not locked. *An emergency plan was not available *A weather durable sign with a 24-hour emergency number was not present. *Routine inspections and performed maintenance were not documented. *Wells were not ventilated properly *An auxiliary power supply was not available *Only a visual alarm was present, lack of auxiliary power prevents alarm in the event of power loss to the station. *Pump run times were not recorded to ensure the two pumps operate in lead-lag sequence. *The dry well contained grease deposits. 	<p>As a part of the CO response, the City will develop a PER that addresses all deficiencies of the pump station and establishes a scope of work for a construction project that addresses deficiencies and brings the station into compliance with SCDHEC r61-67. Additionally, the City will develop a CMOM plan that will establish procedures for pump station inspection and record keeping.</p>	<p>PER, O&M Plan, QR</p>
<p><u>Mountain View Pump Station</u></p> <ul style="list-style-type: none"> *The pump station was not fenced. *An emergency plan was not available *A weather durable sign with a 24-hour emergency number was not present. *Routine inspections and performed maintenance were not documented. *An auxiliary power supply was not available *Audio and visual alarm were present, but lack of auxiliary power prevents alarm in the event of power loss to the station. *One of two pumps was non-operational. 	<p>As a part of the CO response, the City will develop a PER that addresses all deficiencies of the pump station and establishes a scope of work for a construction project that addresses deficiencies and brings the station into compliance with SCDHEC r61-67. Additionally, the City will develop a CMOM plan that will establish procedures for pump station inspection and record keeping.</p>	<p>PER, O&M Plan, QR</p>
<p><u>Pickens Highway Pump Station</u></p> <ul style="list-style-type: none"> *Routine inspections and performed maintenance were not documented. 	<p>As a part of the CO response, the City will develop a PER that addresses all deficiencies of the pump station and establishes a scope of work for a construction project that addresses deficiencies and brings the station into compliance with SCDHEC r61-67. Additionally, the City will develop a CMOM plan that will establish procedures for pump station inspection and record keeping.</p>	<p>PER, O&M Plan, QR</p>

3.7 Manhole Evaluations

3.7.1 Gap Analysis

A gap analysis was completed by the City and GMC to identify informational, procedural, and technological gaps that contribute to the noted deficiencies in the CO. Table 3-13 below summarized the identified gaps.

Table 3-13. Manhole Evaluations Gap Analysis

Deficiency	Gap Analysis
Sediment, grease, and debris was found in manholes.	At the time of inspection, the City did not have formal a program established for SSES including cleaning and manhole inspection.
Risers were not installed on manholes in areas prone to flooding	At the time of inspection, the City had not implemented a sewer system evaluation survey (SSES) program. Also, the City did not have up-to-date GIS mapping and was not able to efficiently identify and address manholes that are at a high risk of flooding.
Only one portable flow meter was being used to monitor flow.	At the time of inspection, the City did not have an established flow monitoring program.

3.7.2 Proposed Corrective Action

Each deficiency has been paired with a specific corrective action and CO required deliverable(s). Table 3-14 below summarizes the proposed corrective action and corresponding CO deliverable.

Table 3-14. Manhole Evaluations Corrective Action

Deficiency	Gap Analysis	CO Deliverable(s)
Sediment, grease, and debris was found in manholes.	As a part of the CO response, the City will develop a CMOM plan in accordance with EPA recommendations. The CMOM will outline requirements of a FOG program in accordance with the OJRSA Sewer Use Ordinance.	O&M Plan, QR
Risers were not installed on manholes in areas prone to flooding	As a part of the CO response, the City will develop a PER that will include a comprehensive plan for long term system SSES, flow monitoring, and rehabilitation. Additionally, the CMOM will establish procedures for execution and documentation of SSES activity.	O&M Plan, QR
Only one portable flow meter was being used to monitor flow.	As a part of the CO response, the City will develop a PER that will include a comprehensive plan for long term system SSES, flow monitoring, and rehabilitation. Additionally, the CMOM will establish procedures for execution and documentation of SSES activity.	O&M Plan, QR

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4 IMPLEMENTATION SCHEDULE

The City is required to respond to the CO in accordance with deadlines established within the CO. Specific CO deliverable requirements are discussed in detail in Section 2 of this CAP. Required dates of delivery are based on the date of execution of the CO. The data of execution of the CO 20-052-W is January 6, 2021.

A summary of CO deliverables and respective deadlines based on the CO execution date is included in Table 4-1 below.

Table 4-1. Deliverable Deadlines

Deliverable / Requirement	Due Date	Date Completed
Civil Penalty	2/5/2021	01/25/2021
Compliance Attainment Plan (this document)	3/7/2021	03/02/2021
Preliminary Engineering Report	5/6/2021	
Operation and Maintenance Plan	7/5/2021	
Construction Plans and Specifications (Pump Station)	9/3/2021	
Construction Plans and Specifications (Sewer Rehabilitation)	Recurring Initiative	Recurring Initiative
Construction Permitting (Pump Stations)	11/2/2021	
Constuction Completion (Pump Stations)	5/1/2022	
Constcruction Completion (Sewer Rehabilitation)	Recurring initiative	Recurring initiative
Quarterly Reporting	March 31; June 30; September 30; and December 31	

In addition to the details included in Table 4-1, this CAP includes a comprehensive CO response schedule in a Gantt chart format. This Gantt schedule includes one full year of CO response requirements and is included with the CAP as Appendix D.

The CO also acknowledges that full compliance with CO requirements will take longer than the final deadline specified in Table 4-1 and in the Gantt chart in Appendix C. Specifically, completion of inspection, cleaning, and rehabilitation of the sewer collection system will be a multi-year effort. As such, construction of sewer rehabilitation is identified in Table 4-1 as a recurring initiative. It is the intent of the City to continue with a systematic approach to SSES and

rehabilitation. The City has started this program with Phase 1 of the Cane Creek Trunk Sewer Rehabilitation project, which is in construction during the Winter and Spring of 2021. The City will continue this program beyond 2021 and will document progress and updates through quarterly reporting to SCDHEC as required by the CO.

APPENDIX A – CONSENT ORDER 20-052-W

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Healthy People Healthy Communities

January 7, 2021

First Class & Certified Mail

9214 8969 0099 9790 1418 7900 16

Mr. Scott Parris
City of Walhalla Sewer Collection System
206 North Church St.
Walhalla, SC 29691

Re: Executed Consent Order 20-052-W
City of Walhalla Sewer Collection System
Operating Permit SSS000064
Oconee County

Dear Mr. Parris:

Enclosed is fully executed Consent Order 20-052-W for the above referenced facility. The Order is considered executed on January 6, 2021.

If you have any questions regarding this matter, please contact me by telephone at (803) 898-0075 or by e-mail at stiverpb@dhec.sc.gov.

Sincerely,

Patrick Stivers
Enforcement Project Manager
Bureau of Water - WP Control Division
WP Enforcement Section

cc: Adam Cannon, SCDHEC, WP Enforcement Manager
Lori Baxley, SCDHEC, WP Compliance
Buck Graham, SCDHEC, Rural Water Advisor
Bridgette Clark, SCHDEC, SSS Permitting
Amy Towe, SCDHEC, Anderson EQC

Enclosure

**THE STATE OF SOUTH CAROLINA
BEFORE THE DEPARTMENT OF HEALTH AND ENVIRONMENTAL CONTROL**

**IN RE: CITY OF WALHALLA SEWER COLLECTION SYSTEM
OCONEE COUNTY**

**CONSENT ORDER
20-052-W**

The City of Walhalla (Walhalla) owns and is responsible for the proper operation and maintenance of a satellite sewer collection system (collection system), located at 206 North Church Street in Walhalla, Oconee County, South Carolina. The collection system consists of three (3) active pump stations and an estimated 40 miles of sewerage system that collect and convey wastewater to the Oconee Joint Regional Sewer Authority (OJRSA) wastewater treatment facility (WWTF).

As observed by South Carolina Department of Health and Environmental Control (Department) staff, Walhalla failed to properly manage, operate, and maintain all parts of its sewer system(s).

In accordance with approved procedures and based upon discussions with agents for Walhalla on August 4, 2020, the parties agree to the issuance of this Order to include the following Findings of Fact and Conclusions of Law:

FINDINGS OF FACT

1. Walhalla owns and is responsible for the proper operation and maintenance of a satellite sewer collection system (collection system), located at 206 North Church Street in Walhalla, Oconee County, South Carolina. The collection system consists of three (3)

active pump stations (e.g., Andover, Mountain View, and Pickens Highway) and an estimated 40 miles of collection lines.

2. The Department issued Permit SSS000064 (Permit) to Walhalla, authorizing it to collect and send wastewater to the Coneross Creek wastewater treatment plant (WWTP). The WWTP is owned by Oconee Joint Regional Sewer Authority (OJRSA). The effective date of the Permit is January 4, 2012.
3. On June 28, 2019, Department staff conducted an inspection of the collection system with a representative of Walhalla present and made the following observations during the inspection:

RECORDS/ REPORTS/ MAPS

- a) The collection system's map was over forty years old;
- b) Records of budget, maintenance, repairs, overflows, taps, work orders, and complaints were not available;
- c) A list of emergency equipment and 24-hour contacts was not available;

LINES AND INFLOW & INFILTRATION (I/I) EVALUATION

- d) Regular line evaluation and maintenance records were not available;
- e) More than thirty (30) manholes did not have risers installed and are subject to being submerged during heavy rains;

SANITARY SEWER OVERFLOWS (SSO)

- f) Records of SSOs (non-reportable and reportable quantities) were not maintained on site;

OPERATION AND MAINTAINENCE (O&M) / RIGHT OF WAY

- g) A written O&M plan and right of way maintenance program was not available;

- b) Pump station inspections were not documented;
- i) Schedules for maintenance, cleaning, or inspections were not established;
- j) Maintenance of sewer lines and right of ways were not documented;

FATS, OIL AND GREASE (FOG) PROGRAM / SEWER USE ORDINANCE

- k) A FOG program had not been established;
- l) The Sewer Use Ordinance developed by OJRSA had been adopted but not enforced due to limited staffing;
- m) A public outreach or education program had not been established;

PUMP STATION EVALUATIONS

Andover Pump Station

- n) The pump station was not fenced;
- o) A lid over the dry and wet well was not locked;
- p) An emergency plan was not available;
- q) A weather durable sign with a 24-hour emergency number was not present;
- r) Routine inspections and performed maintenance were not documented;
- s) Wells were not ventilated properly;
- t) An auxiliary power supply was not available;
- u) Only a visual alarm was present, lack of auxiliary power prevents alarm in the event of power loss to the station;
- v) Pump run times were not recorded to ensure the two pumps operate in lead lag sequence;
- w) The dry well contained grease deposits;

Mountain View Pump Station

- x) The pump station was not fenced;
- y) An emergency plan was not available;
- z) A weather durable sign with a 24-hour emergency number was not present;
- aa) An auxiliary power supply was not available;
- bb) Audio and visual alarms are present, but lack of auxiliary power prevents alarm in the event of power loss to the station;
- cc) One of two pumps was non-operational;
- dd) Routine inspections and performed maintenance were not documented;

Pickens Highway Pump Station

- ee) Routine inspections, maintenance or pump run times were not documented;

MANHOLE EVALUATIONS

- ff) Sediment, grease and debris was found in manholes;
 - gg) Risers were not installed on manholes in areas prone to flooding; and
 - hh) Only one portable flow meter was being used to monitor flow.
4. On July 20, 2020, the Department issued a Notice of Alleged Violation and Notice of Enforcement Conference (NOAV/NOEC), via certified mail, to Walhalla for the alleged violations. The NOAV/NOEC was delivered on July 22, 2020.
 5. On August 4, 2020, Department staff held an enforcement conference with representatives of Walhalla via teleconference. A representative of Walhalla stated that many of the documents that were not readily available during the inspection are now available. The representative also stated that Walhalla has proactively been developing its courses of action to address the violations throughout the collection system and has acquired approval for funding and various projects, and has made progress in many of the

deficient areas such as surveying for updated mapping and inspection of the sewer lines and cleaning. Future projects include raising manholes in flood areas and increasing number of personnel on its sewer teams to continue addressing the violations discovered during the inspection in order to attain compliance with its Permit. Subsequent to the enforcement conference, Walhalla provided to the Department, via email, a breakdown of the various sources and amounts of funding it has been approved and provided, as well as the use of the funds by project. These projects include surveys, repairs, and upgrades. The parties discussed the possibility of a Consent Order containing a civil penalty.

CONCLUSIONS OF LAW

Based upon the above Findings of Fact the Department reaches the following Conclusions of Law:

1. Walhalla violated the Pollution Control Act, S.C. Code Ann. § 48-1-110(d) (2008 & Supp. 2019), and Water Pollution Control Permits Regulation, S.C. Code Ann. Regs. 61-9.610.3(a) (2011), in that it failed to properly manage, operate, and maintain at all times all parts of its sewer system(s).
2. Walhalla violated the Pollution Control Act, S.C. Code Ann. § 48-1-110(d) (2008 & Supp. 2019), and Water Pollution Control Permits Regulation, S.C. Code Ann. Regs. 61-9.610.3(c) (2011), in that it failed to take all reasonable steps to prevent, stop and mitigate the impact of releases of wastewater to the environment, including but not limited to implementing a written operation/maintenance plan.
3. The Pollution Control Act, S.C. Code Ann. § 48-1-330 (2008), provides for a civil penalty not to exceed ten thousand dollars (\$10,000.00) per day of violation for any person violating the Act or any rule, regulation, permit, permit condition, final

determination, or Order of the Department.

NOW, THEREFORE, IT IS ORDERED, CONSENTED TO AND AGREED, pursuant to the Pollution Control Act, S.C. Code Ann. §§ 48-1-50 and 48-1-100 (2008 and Supp. 2019), that Walhalla shall:

1. Within sixty (60) days of the execution date of this Order, submit to the Department a compliance attainment plan (Compliance Attainment) to outline courses of action required to resolve the violations associated with the collection system, and identified in this Order. In order to meet the requirements of the Compliance Attainment, Walhalla shall:

- a. Within one hundred twenty (120) days of the execution date of this Order, submit to the Department three (3) copies of a Preliminary Engineering Report (PER), prepared by a South Carolina licensed professional engineer, addressing planned improvements to the collection system. The PER shall include a plan for a full assessment and evaluation of the entire collection system, including all sewer lines, manholes, pump stations, wet wells, and all associated appurtenances; recommendations for repairs and improvements to the collection system; a scope of work; and a schedule of implementation and completion. This Consent Order acknowledges that full assessment and evaluation of the entire collection system will be a long-term effort. The PER shall be administratively and technically complete and prepared in accordance with Standards for Wastewater Facility Construction, S.C. Code Regs. 61-67 (2012 & Supp. 2019).
- b. Within one hundred eighty (180) days of the execution date of this Order, submit to the Department a notarized document certifying that Walhalla has developed and implemented a written operation/maintenance plan. The implemented plan

must contain appropriate elements including but not limited to: a current system map, schedule(s) for inspections and/or line cleaning, a schedule for equipment testing, and methods for addressing system problems (i.e., emergency response methods to include how to repair equipment in a timely fashion and effect needed site clean up and sanitation). Upon request, the plan shall be made available for DHEC review.

- c. Within one hundred twenty (120) days from the Department's approval of the PER, required by item 1.a. above, submit to the Department three (3) copies of plans, specifications, an application, and any other necessary documents for a Permit to Construct upgrades to the Andover, Mountain View, and Pickens Highway pump stations necessary to comply with Operating Permit SSS000064. The wastewater construction application package must be administratively and technically complete and prepared in accordance with Standards for Wastewater Facility Construction, S.C. Code Regs. 61-67 (2012 & Supp. 2019). This Consent Order acknowledges that multiple construction projects may be required to address Findings of Fact items d., e., and gg., and achieve the goals set forth in the PER required by item 1.a. above.
- d. Within sixty (60) days from the date the Department issues a Construction Permit authorizing construction of the items detailed in the application package required by item 1.b. above, begin construction of all upgrades detailed within such Construction Permit.
- e. Within one hundred eighty (180) days from issuance of the Construction Permit(s) subject of item 1.c above, complete all construction activities and

request an Approval to Place into Operation the required upgrades from the Department's Upstate Environmental Quality Control Anderson Office.

2. This Consent Order acknowledges that multiple construction projects may be required to achieve the goals set forth in the PER required by item 1.a. above. Walhalla shall submit progress reports and updates to the Compliance Attainment Plan / PER to the Department on a quarterly basis. This report shall detail progress relative to the original Compliance Attainment Plan / PER, summarize work completed in the previous quarterly period, and provide detail of work planned for the upcoming quarterly period.
3. This Consent Order shall terminate upon Walhalla: completing the repairs/upgrades identified in the Compliance Attainment; achieving a Satisfactory rating from a Department representative during a collection system inspection; and, fulfilling all other requirements detailed within this Consent Order (e.g., payment of assessed penalties, etc.).
4. Within thirty (30) days of the execution date of this Order, pay to the Department a civil penalty in the amount of one thousand, four hundred dollars (\$1,400.00).

PURSUANT TO THIS ORDER, communications regarding this Order and its requirements, including civil penalty payments, shall include the Order number and be addressed as follow:

Attn: Patrick Stivers
SCDHEC - Bureau of Water
WP Enforcement Section
2600 Bull Street
Columbia, S.C. 29201

IT IS FURTHER ORDERED AND AGREED that failure to comply with any provision of this Order shall be grounds for further enforcement action pursuant to the Pollution Control Act, S.C. Code Ann. § 48-1-330 (2008), to include the assessment of additional civil penalties.

IT IS FURTHER ORDERED AND AGREED that this Consent Order governs only the civil

liability to the Department for civil sanctions arising from the matters set forth herein and constitutes the entire agreement between the Department and Walhalla with respect to the resolution and settlement of these civil matters. The parties are not relying upon any representations, promises, understandings or agreements except as expressly set forth within this Order.


THE PARTIES UNDERSTAND that the “execution date” of the Order is the date the Order is signed by the Director of Environmental Affairs.

[Signature Page Follows]


**FOR THE SOUTH CAROLINA DEPARTMENT
OF HEALTH AND ENVIRONMENTAL CONTROL**


Myra C. Reece
Director of Environmental Affairs

Date: 1-6-2021


James M. Marcus, PhD, Chief
Bureau of Water

Date: 1/4/2021


Randy Stewart, Director
Water Pollution Compliance and
Enforcement Division
Bureau of Water

Date: 12/31/2020

Reviewed By:


DHEC Legal Counsel

Date: 1-5-2021

WE CONSENT:

CITY OF WALHALLA SEWER COLLECTION SYSTEM


Scott Parris, City of Walhalla Utilities Director

Date: 12-23-2020

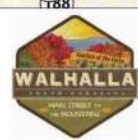
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APPENDIX B – COLLECTION SYSTEM MAPS

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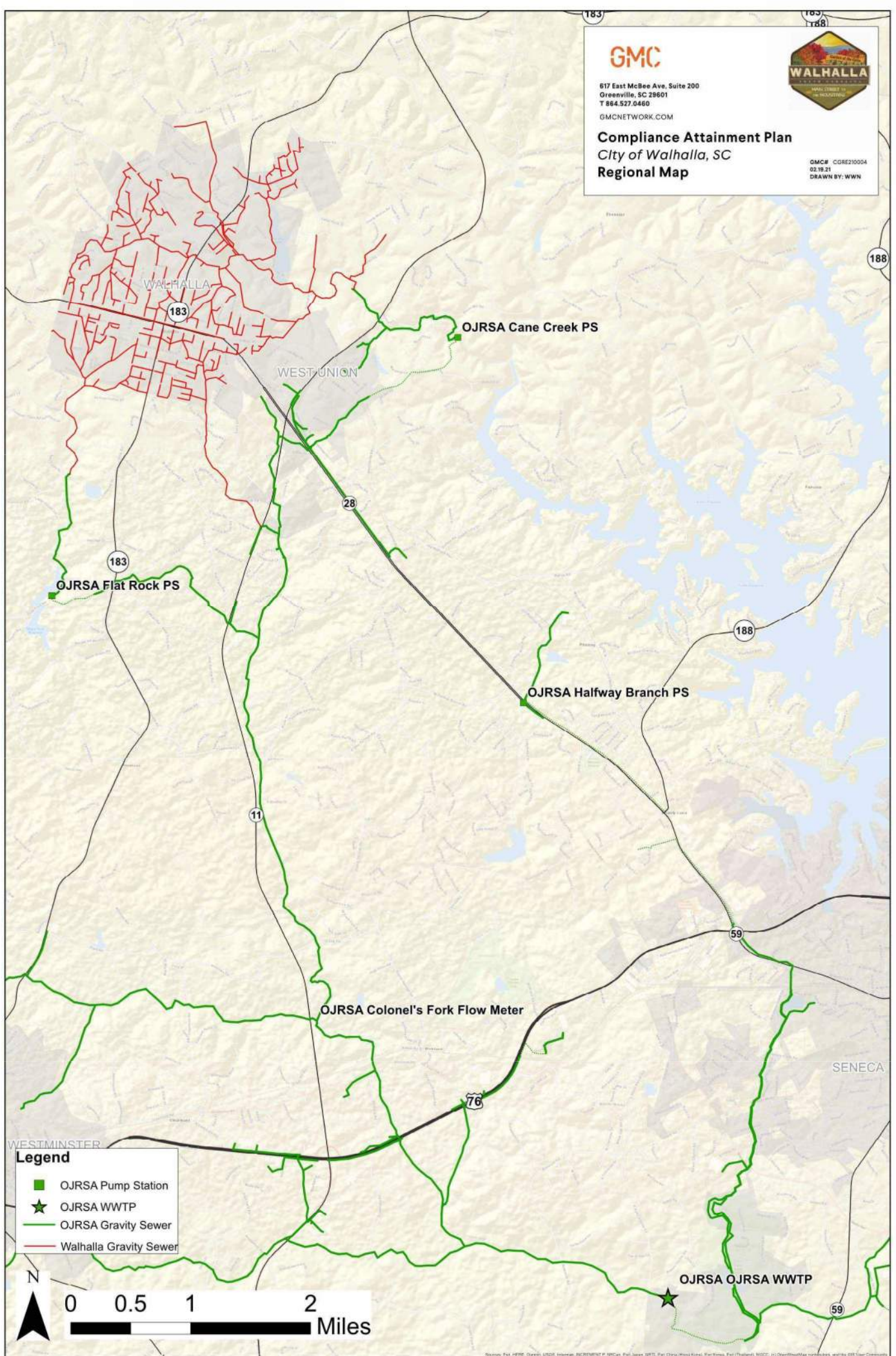


617 East McBee Ave, Suite 200
Greenville, SC 29601
T 864.527.0460
GMCNETWORK.COM



Compliance Attainment Plan City of Walhalla, SC Regional Map

GMC# CGR210004
02.19.21
DRAWN BY: WVN



- Legend**
- OJRSA Pump Station
 - ★ OJRSA WWTP
 - OJRSA Gravity Sewer
 - Walhalla Gravity Sewer

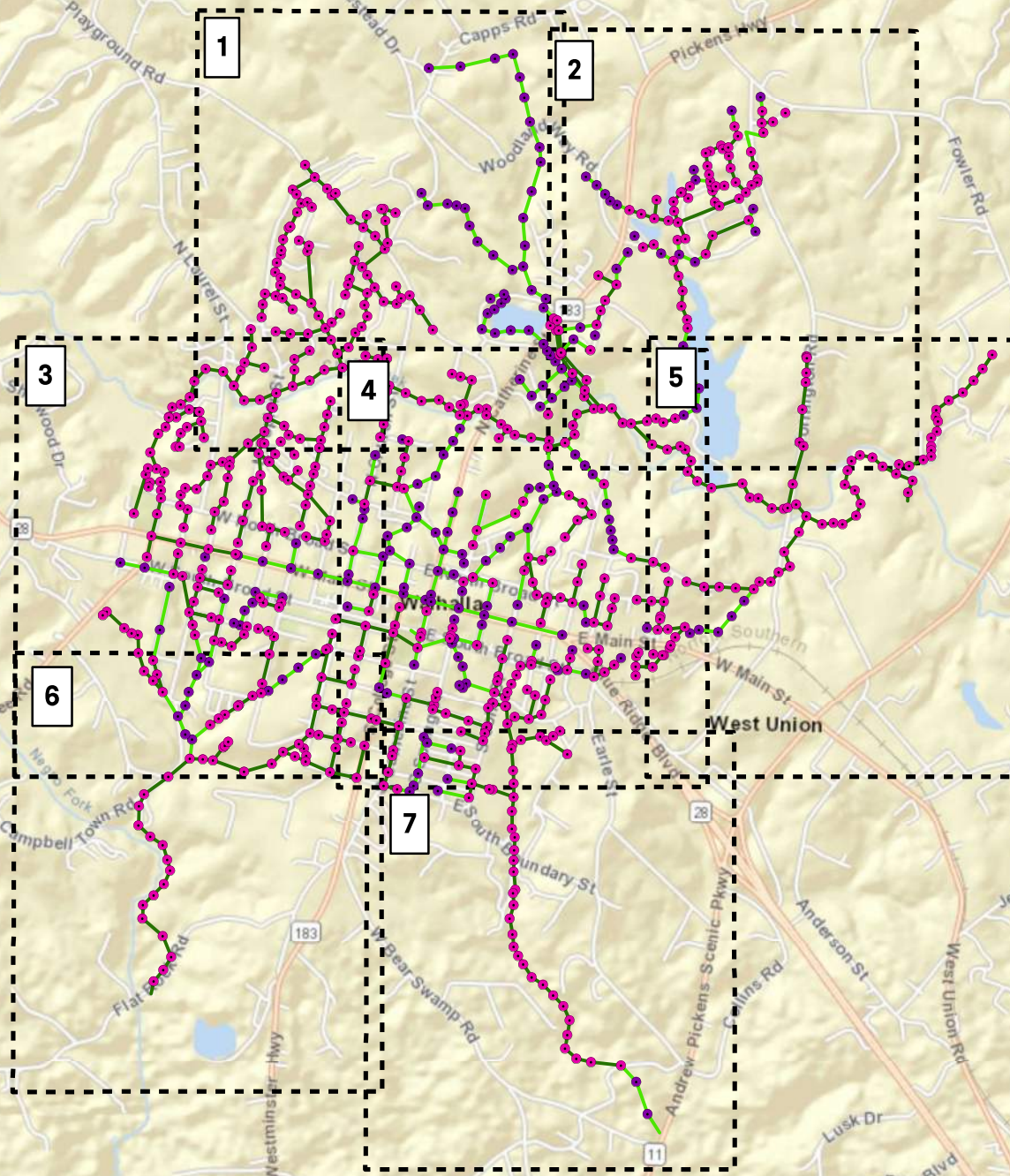


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Full System

Legend

- Manhole
- Manhole Not Surveyed
- Gravity Sewer
- Gravity Sewer Not Surveyed



0 0.25 0.5 1 Miles



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Walhalla Consent Order Walhalla, South Carolina

GMC# CGRE210004
02/23/2021
DRAWN BY: HCR



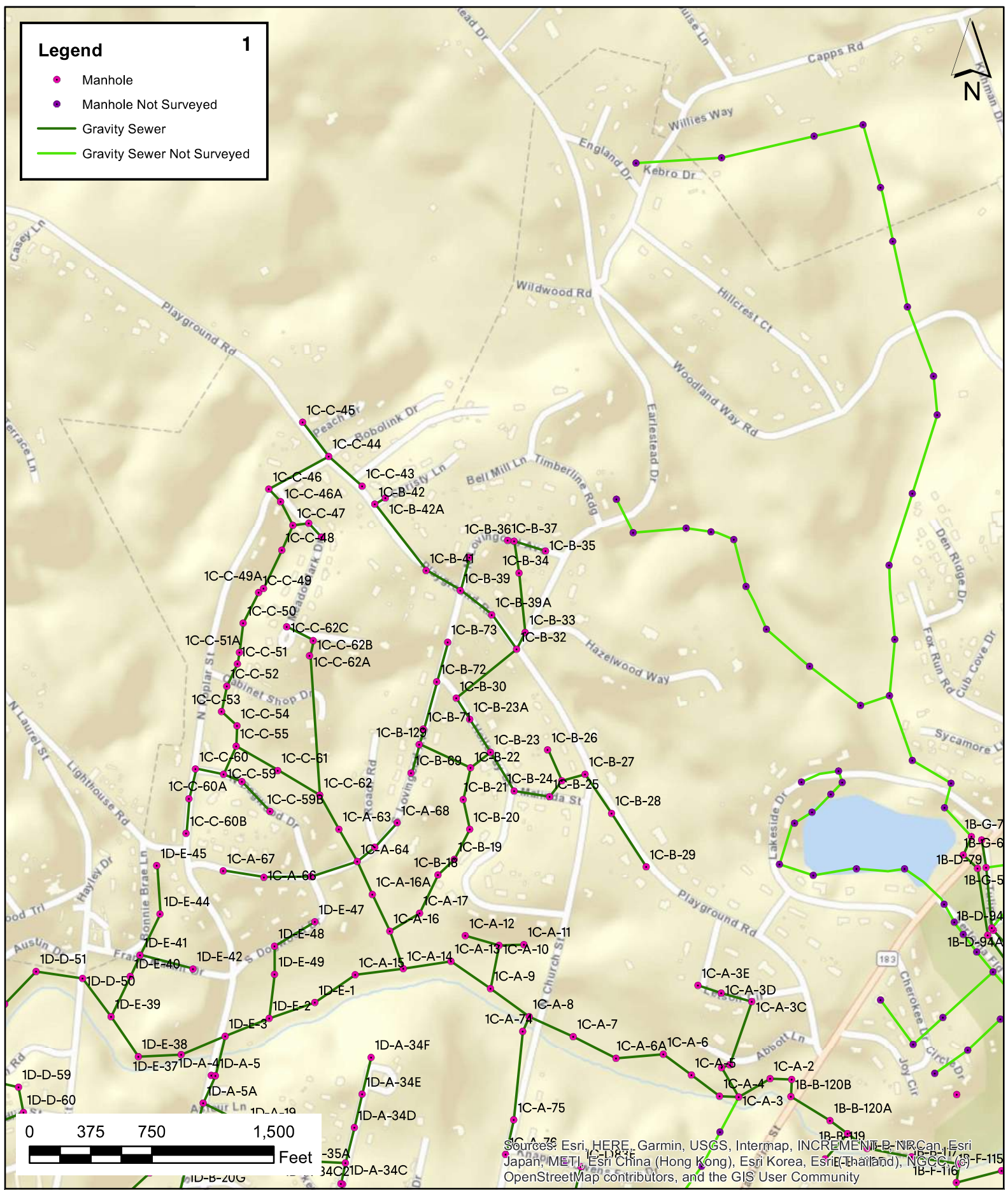
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Legend

1

- Manhole
- Manhole Not Surveyed
- Gravity Sewer
- Gravity Sewer Not Surveyed

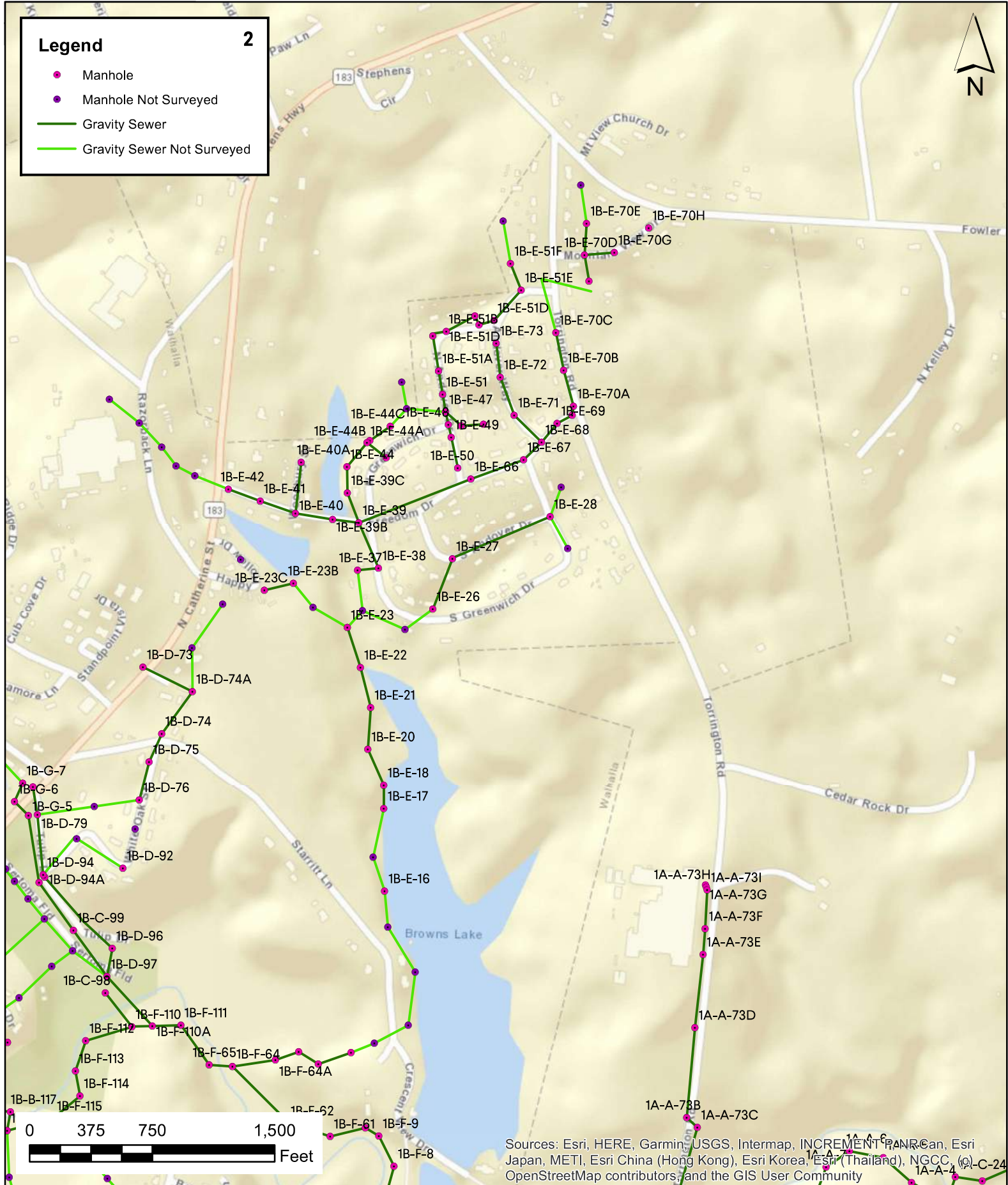


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Legend

2

- Manhole
- Manhole Not Surveyed
- Gravity Sewer
- Gravity Sewer Not Surveyed



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Walhalla Consent Order

Walhalla, South Carolina

GMC# CGRE210004
02/23/2021
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GMC

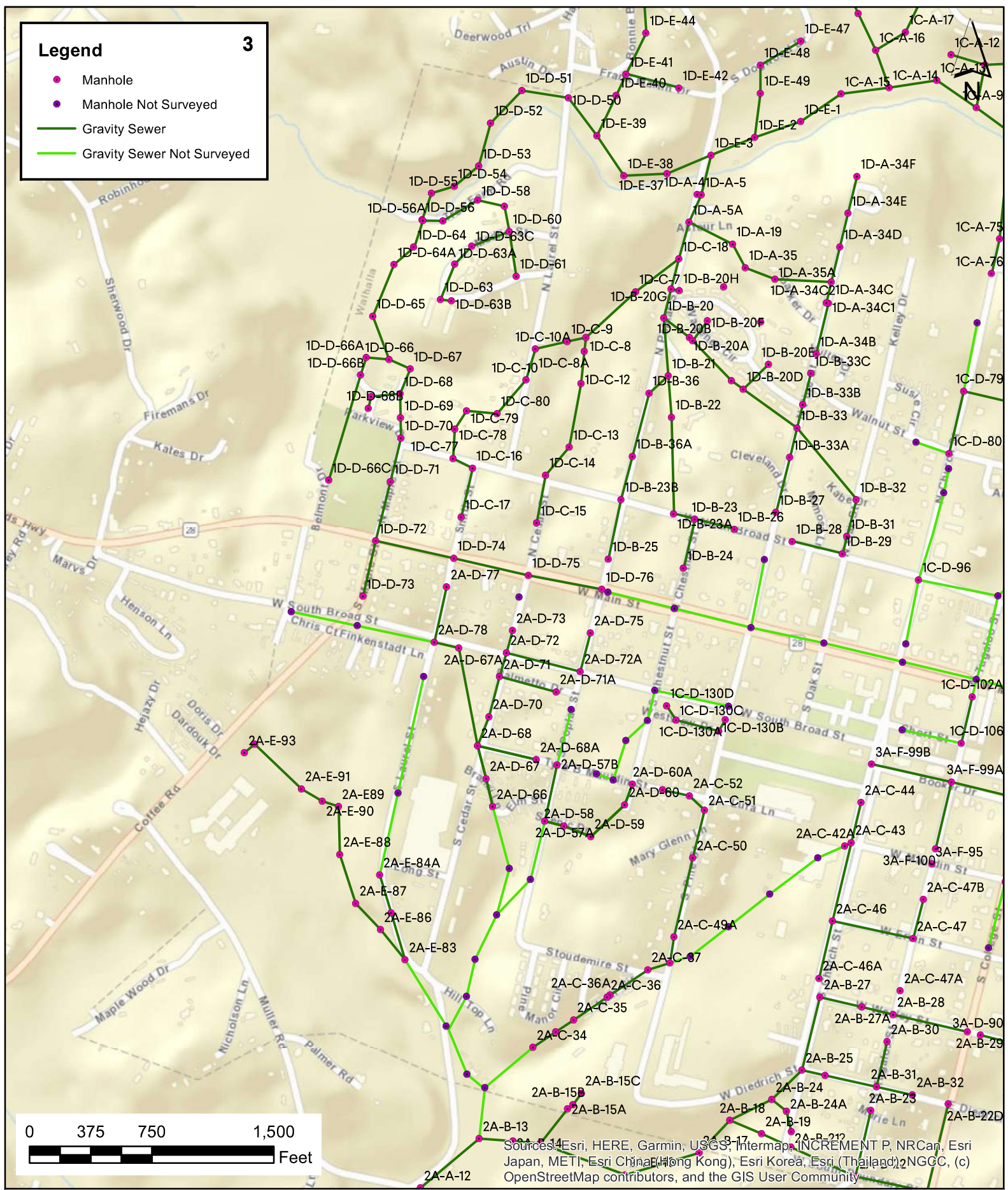
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Legend

3

- Manhole
- Manhole Not Surveyed
- Gravity Sewer
- Gravity Sewer Not Surveyed



Walhalla Consent Order Walhalla, South Carolina

GMC# CGRE210004
02/23/2021
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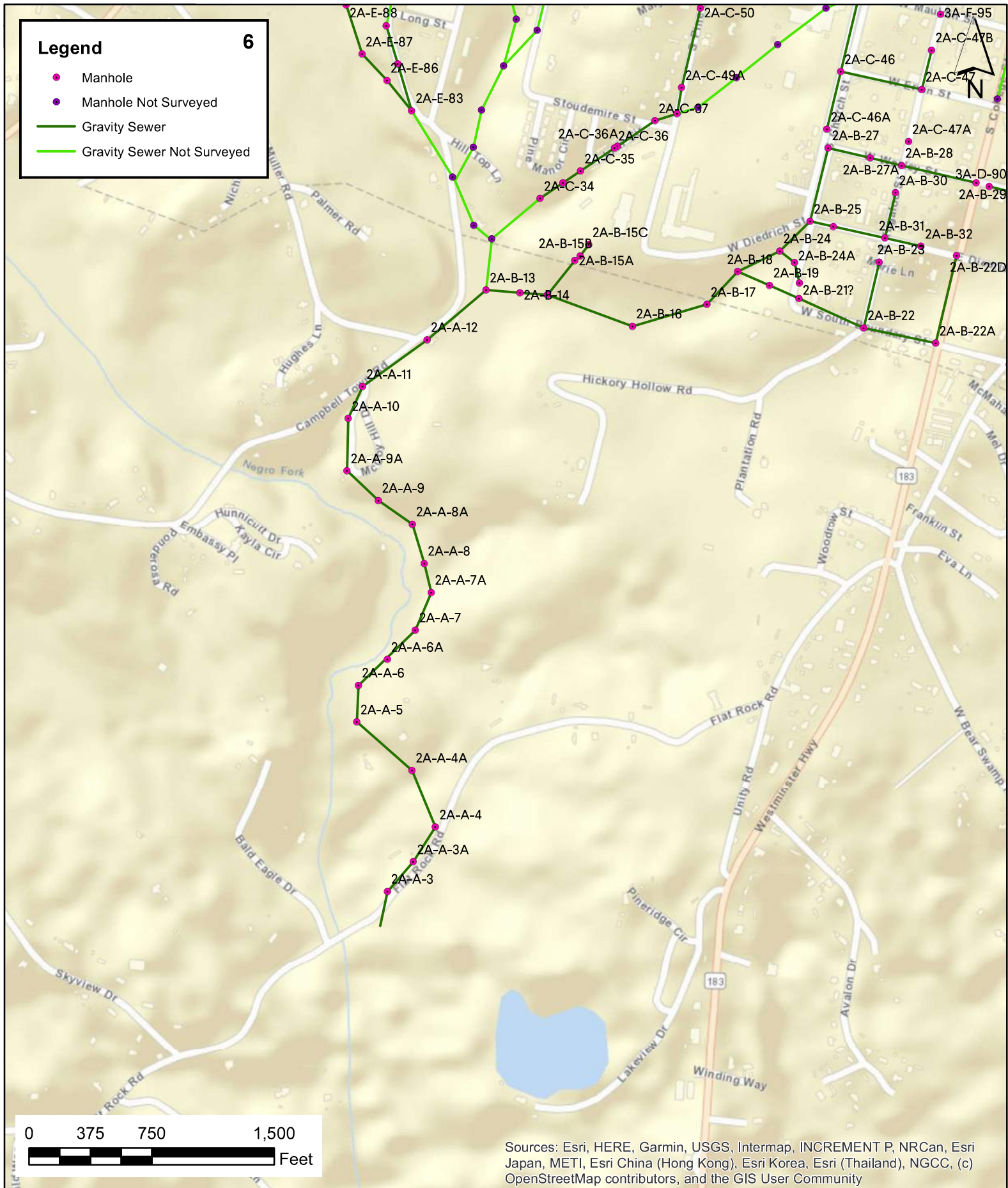
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Legend

6

- Manhole
- Manhole Not Surveyed
- Gravity Sewer
- Gravity Sewer Not Surveyed



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Walhalla Consent Order

Walhalla, South Carolina

GMC# CGRE210004
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DRAWN BY: HCR



GMC

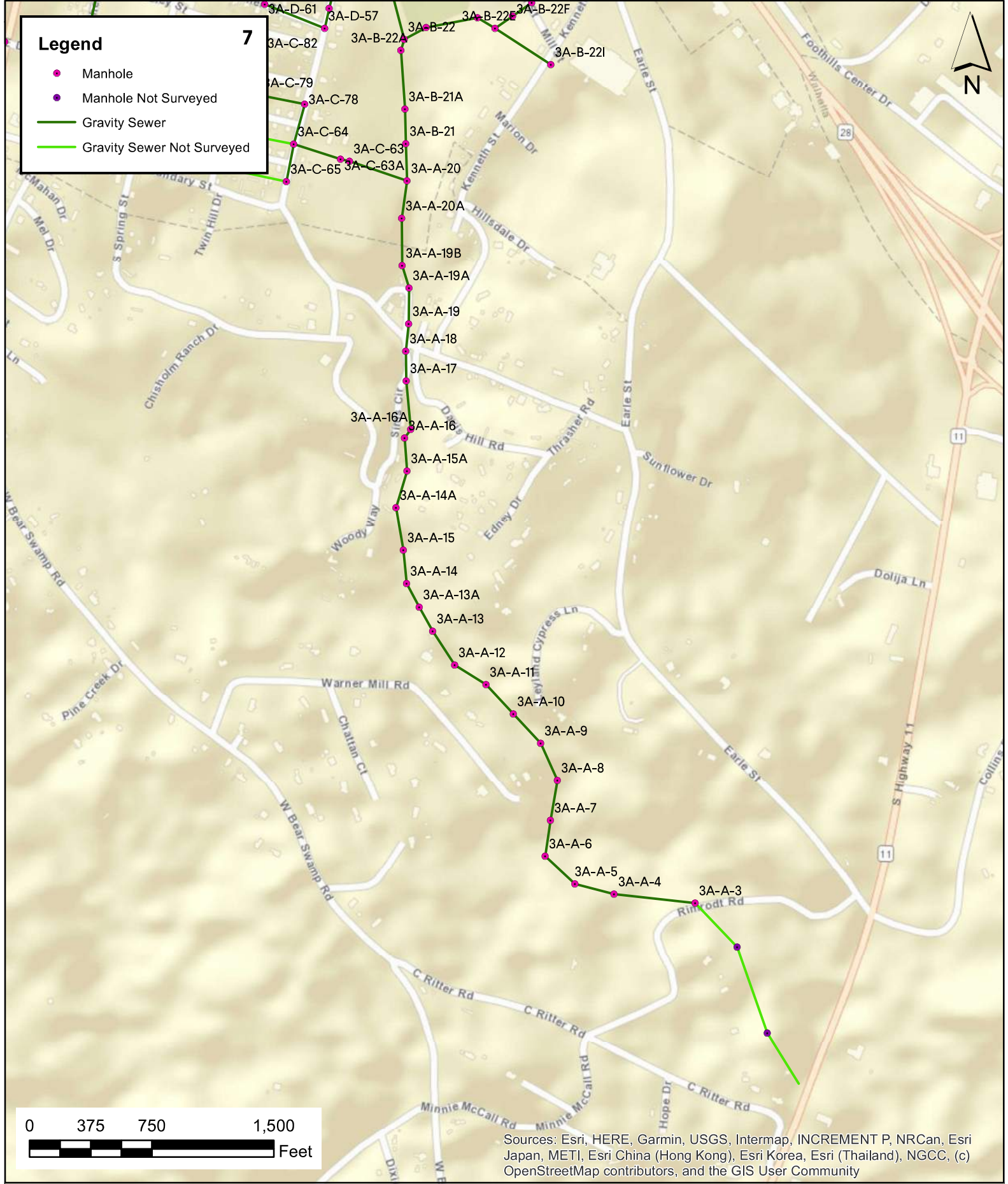
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Legend

7

- Manhole
- Manhole Not Surveyed
- Gravity Sewer
- Gravity Sewer Not Surveyed



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community

Walhalla Consent Order

Walhalla, South Carolina

GMC# CGRE210004
02/23/2021
DRAWN BY: HCR



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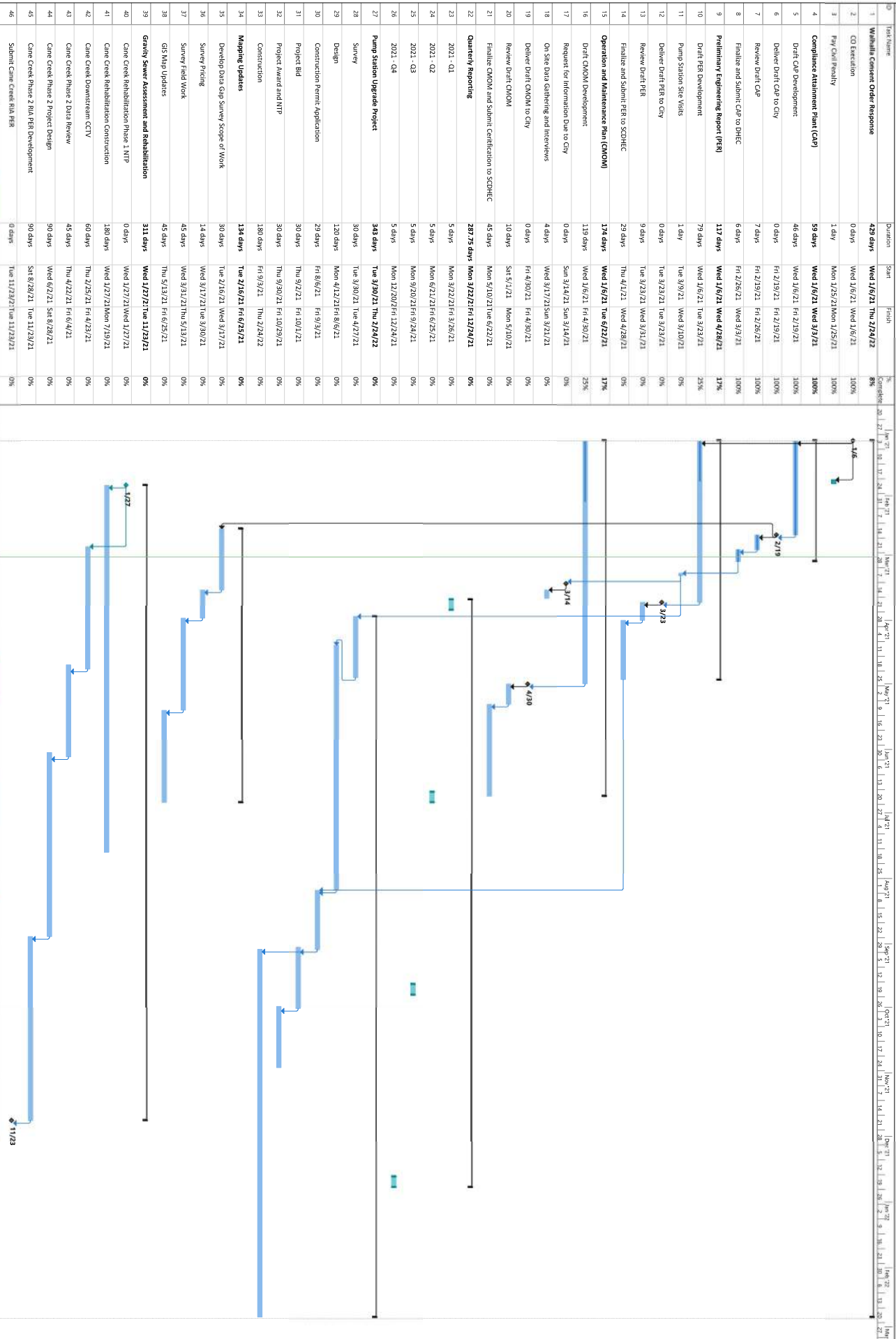
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APPENDIX C – CO RESPONSE SCHEDULE

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City of Walhalla
Sewer Consent Order 20-052-W
Schedule for Response to CO



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117 Welborn Street
Greenville, SC 29601
864.527.0460

www.gmcnetwork.com



Downtown Water Line Replacements Walhalla, South Carolina

GMC#: CGRE220034

DATE: 9/2/2022

DRAWN BY: SBA

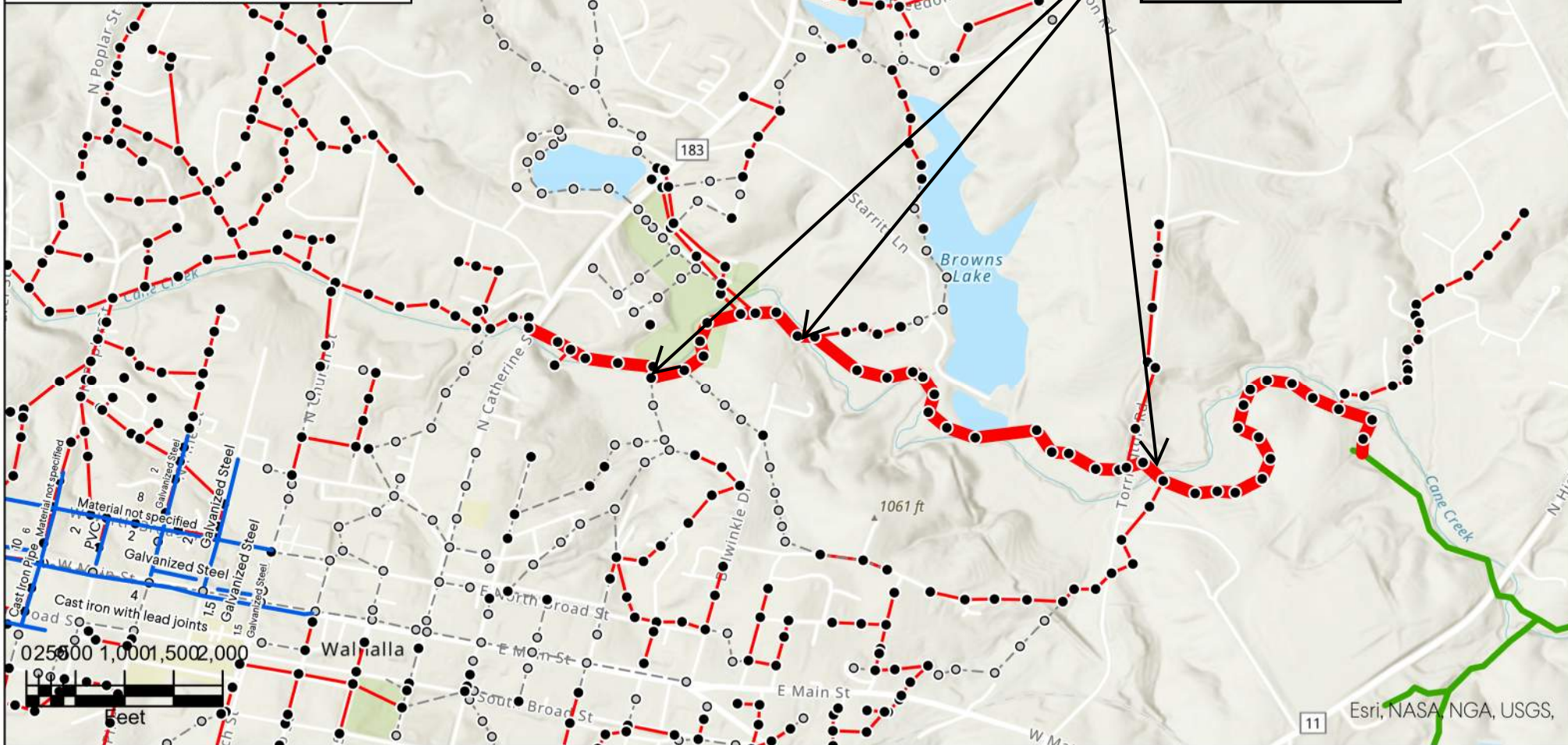


GMC

117 Welborn Drive
Greenville, SC 29601
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LEGEND

- Walhalla Waterline Project
- Walhalla Surveyed MHs
- Walhalla MHs to be surveyed
- Walhalla Gravity to be surveyed
- Walhalla Surveyed Gravity
- OJRSA Pump Station
- OJRSA Gravity
- ⋯ OJRSA Force Main



Cane Creek Proposed Sewer Rehabilitation Walhalla, South Carolina

GMC#: CGRE220034
DATE: 8/30/2022
DRAWN BY: SBA

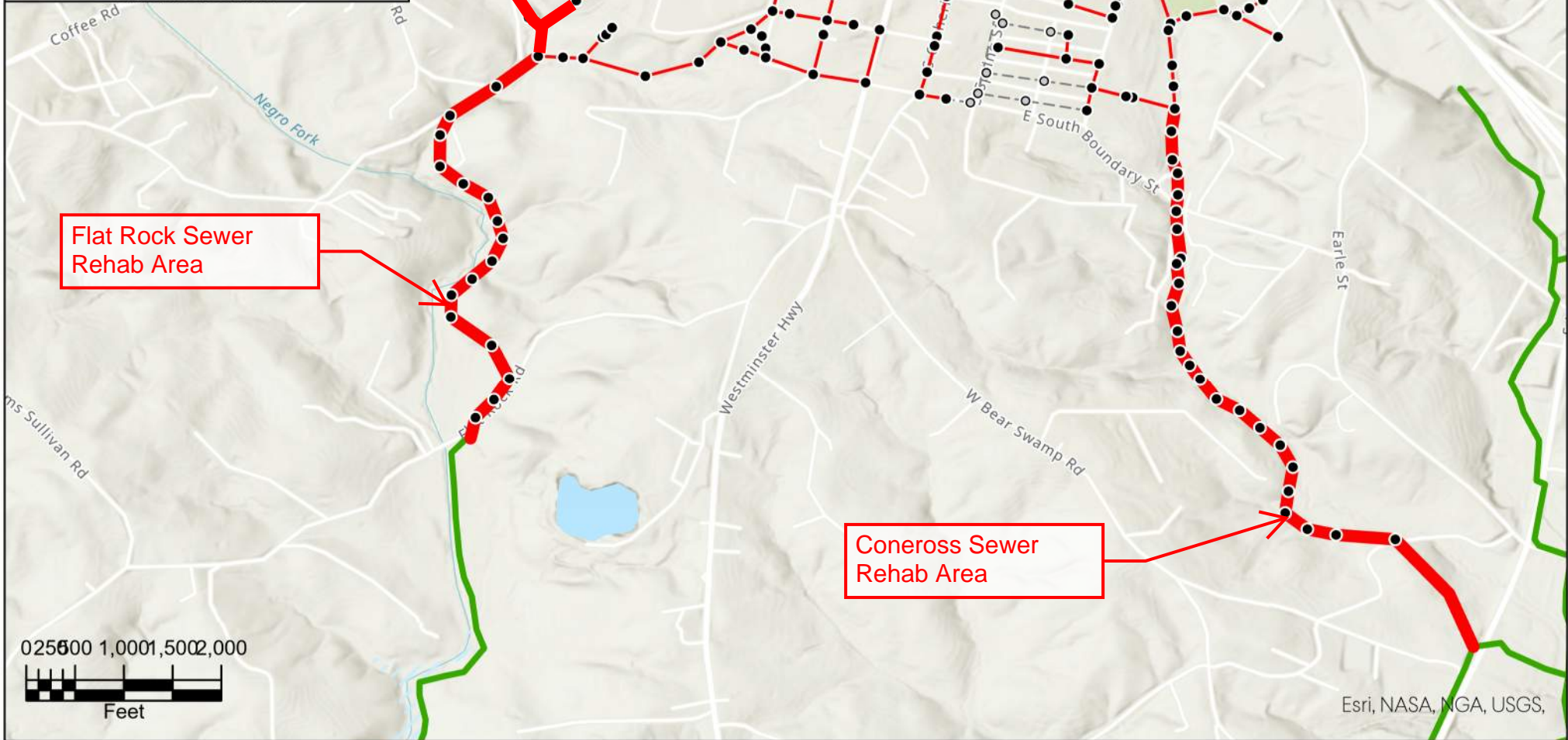


GMC

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Greenville, SC 29601
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LEGEND

- Walhalla Waterline Project
- Walhalla Surveyed MHs
- Walhalla MHs to be surveyed
- - - Walhalla Gravity to be surveyed
- Walhalla Surveyed Gravity
- OJRSA Pump Station
- OJRSA Gravity
- ⋯ OJRSA Force Main



Flat Rock and Coneross Proposed Sewer Rehabilitation Walhalla, South Carolina

GMC#: CGRE220034
DATE: 8/30/2022
DRAWN BY: SBA



GMC

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