

**Action Requested/Required:**

- ☐ Vote/Action Requested
☒ Discussion or Presentation Only
☐ Public Hearing
Report Date: _____
Hearing Date: _____
Voting Date: _____

Department: Community Development**Presenter(s) & Title:** Bethany Watson

City Engineer

Agenda Item Title:

Discussion on Task Order 1 from Brown & Caldwell for Canton IPP Support Services in the amount of \$109,050.00.

Summary:

In response to increase regulations, growing industrial users, and new plant operations, City Staff has requested a proposal from B&C to provide IPP Support Services. B&C will assist with updates to the City's local limits under our IPP (Industrial Pretreatment Program) for the Water Pollution Control Plant. The objective of this project is to re-evaluate the existing local limits to determine if new limits need to be developed and develop those limits if need. Additionally, select IPP support tasks are proposed, which will include review and updating the program documents and complementing an Industrial User Survey.

Budget Implications:Budgeted? ☒ Yes ☐ No ☐ N/ATotal Cost of Project: \$ 109,050.00 Check if Estimated ☐Fund Source: General Fund ☐ Water & Sewer ☒ Sales Tax ☐ Other: _____**Staff Recommendations:****Reviews:**Has this been reviewed by Management and Legal Counsel, if required? ☐ Yes ☐ No**Attachments:**

Proposal
Task Order 1

THIS SERVES AS A SUPPLEMENTAL AGREEMENT made as of _____, between the **City of Canton, Georgia, (OWNER)** and **Brown and Caldwell (Consultant)**.

Owner and **Consultant** have previously executed a Professional Services Agreement dated May 1, 2023, that defines general terms under which **Consultant** will furnish General Consulting Engineering Services and Project Engineering Services to **Owner**. **Owner** now wishes to engage **Consultant** to provide services in connection with the Project known as Task Order No. 1 – Canton IPP Support Services. The Scope of Services is defined in Attachment A.

The fee for these services will be a Time and Expense Amount as outlined in Exhibit A of the Professional Services Agreement. Payments will be made monthly in accordance with the number of hours worked by the personnel of **the Consultant**. The amount will not exceed amount of one hundred nine thousand and fifty dollars (\$109,050).

IN WITNESS WHEREOF, the parties hereto have made and executed this Agreement as of the day and year first above written.

Owner:

City of Canton

Bill Grant

Mayor

Title

Signature

Attest:

Annie Fortner, City Clerk

Approved as to form

Robert M. Dyer

City of Canton

Attorney

Consultant:

Brown and Caldwell

By (Typed Name)

Title

Signature

Attest:

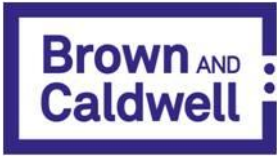
ATTACHMENT A

990 Hammond Drive, Suite 500
Atlanta, Georgia 30328
Tel: (770) 394-2997

www.browncaldwell.com

Submitted to: bethany.watson@cantonga.gov

July 23, 2025



Bethany Watson
City Engineer
City of Canton Water and Sewer
110 East Main Street
Cumming, Georgia 30040

SID 155877

Subject: Proposal for City of Canton Industrial Pretreatment Support
Water & Sewer Professional Engineering Services

Dear Ms. Watson:

Brown and Caldwell (BC) is pleased to submit this proposal to City of Canton Water and Sewer (City) to assist with updates of the City's local limits under their Industrial Pretreatment Program (IPP) for the Canton Water Pollution Control Plant (WPCP). The objective of this project is to re-evaluate the existing local limits to determine if new limits need to be developed and developing new local limits if needed. Additionally, select IPP support tasks are proposed for this project which include the review and updating of program documents and completing an industrial user survey.

Scope of Work

Task 1 – Data Review and Sampling and Analysis Plan

BC will provide a list of the data needed to complete the evaluation (Data Needs Checklist). This will allow City of Canton to collect and assemble the data and information needed for the evaluation, and make it available to BC in electronic, readily-usable format.

BC will compare information and monitoring data provided by City of Canton to the Data Needs Checklist. Findings of the analysis and data gaps will be discussed with City of Canton to determine if any additional information or data may be available to fill the gaps and what additional data and information is necessary to perform the evaluation.

If BC determines that additional characterization data and/or additional sampling and analysis is necessary to meet U.S. Environmental Protection Agency (EPA) and Georgia EPD requirements, BC will develop a sampling analysis plan (SAP).

As requested, BC has included sampling support (labor) option to obtain domestic/commercial data and other data gaps identified. This will include sampling at two lift stations not influenced by industrial contributions. Up to 7 sample sets will be collected concurrently with plant influent and effluent.

BC will review relevant documents and monitoring data for each potential pollutant of concern (POC). BC staff will identify potential POCs from the following:

- EPA's 15 National POCs
- Water Quality Standards
- NPDES Permit Effluent Limits

- Reuse Standards (if applicable)
- Sludge/Biosolids Disposal Criteria
- Pollutants with an existing local limit
- Other pollutants measured in quantities that may cause pass through or interference

Deliverables

- Data Needs Checklist
- SAP (if needed)
- POC Screening
- One-hour conference call or virtual meeting to discuss data gaps or POC screening. Meeting minutes will be provided after the call.

Assumptions

- Requested data and information will be provided in an electronic and editable format specified by BC
- If additional sampling is required, City of Canton will conduct all sampling and be responsible for the cost of laboratory analysis, or the City can elect for the option to have BC provide labor for sampling and equipment rental

Task 2 – Local Limits Evaluation and Development

BC will evaluate existing local limits for WPCP in accordance with the 2004 U.S. EPA *Local Limits Development Guidance*.

- Evaluate existing Maximum Allowable Headworks Loadings (MAHLs) compared to WPCP influent loadings
- Population trends
- Industrial User (IU) inventory
- IU flow trends
- Treatment Plant Compliance History
- Any changes to the conditions or limiting criteria for which the existing local limits were calculated (e.g., changes in the NPDES permit or water quality standards)

BC will evaluate the list of POCs, together with the information above, to assess if any new POCs need a local limit, and calculate MAHLs.

BC will develop MAHLs, where applicable, for the following environmental criterion:

- Acute and chronic water quality standards
- NPDES permit limits
- Reuse standards and septage practices (if applicable)
- Sludge/Biosolids treatment and end uses, and/or sludge disposal and landfilling, and land application
- Treatment plant design criteria and process inhibition provided by City of Canton or others
- Protection of treatment works, collection system, and workers

Once allowable headworks loadings are calculated for each applicable environmental criterion, the most stringent of these loadings is designated as the MAHL. The MAHL of

each pollutant of concern will be converted to a mass-based local limit. Per City of Canton, local limits will be established as mass-based limits for industrial users rather than uniform concentration limits, with the flexibility to establish daily max and monthly average concentration limits based on permitted flow.

Deliverables

- MAHL Summary
- One-hour conference call or virtual meeting to discuss local limits evaluation and determine if adjustments are needed (e.g., safety and growth factor; industrial allocations), and discuss required changes to the sewer ordinance (if necessary). Meeting minutes will be provided after the call.

Task 3 – Reporting

BC will submit the draft report of the completed local limits evaluation or development to City of Canton outlining the evaluation process and any recommendations concerning proposed limits changes. The report will include the following components:

- Guidance on the development of local limits on discharges to the WPCP
- Assumptions and rationale used during the development process
- Descriptions and sources of equations used for calculating local limits
- Sources and limitations of data utilized in the development of local limits
- Hard copies and PDF of all spreadsheets and calculation worksheets used in the evaluation process
- PDF summary of MAHL and MAIL determinations
- Proposed local limits and a comparison to existing local limits
- Recommendations based on technical criteria

City of Canton staff will review the report and recommendations. BC will incorporate City of Canton's comments into a final report suitable for submission to Georgia EPD for approval. It is assumed that the final report will be submitted electronically to Georgia EPD by BC or City of Canton.

Deliverables

- PDF of Local Limits Evaluation or Development Report

Assumptions

- Report will be provided electronically to City of Canton and Georgia EPD.
- Coordination and response to Georgia EPD comments and/or revisions to the Local Limits Development Report will be performed as a separate amendment, as it may take up to one year for Georgia EPD to review and approve local limits changes.

Task 4 – Pretreatment Program Evaluation

BC will conduct a focused evaluation of the City's Industrial Pretreatment Program (IPP). This will consist of a desktop review that will assess compliance with federal, state, and local pretreatment regulations. The support will consist of the assessment of the following:

- Sewer Use Ordinance/Pretreatment Ordinance
- Enforcement Response Plan
- Industrial User Permits

- Fats, Oils, and Grease (FOG) Inspection Plan
- Data Management Software

BC will compile the findings of the evaluation into a draft IPP Evaluation Technical Memorandum (TM). The TM will describe any significant findings and deficiencies. It will also include recommendations for enhancing/improving the program based on industry best practices.

Deliverables

- Draft IPP Evaluation Technical Memorandum
- Final IPP Evaluation Technical Memorandum

Task 5– Industrial User Survey

BC will conduct an industrial user survey focused on identification of SIUs, dental users, food service establishments, and other commercial users which may need to be regulated by the City. BC will work with the City to compile a list of possible users that meet these criteria. BC will develop a survey form that will be mailed by the City to all prospective users and BC will process survey forms and conduct follow-ups with phone calls to increase participation. BC will compile the results in an industrial user survey Technical Memorandum.

Deliverables

- Draft Industrial User Survey Technical Memorandum
- Final Industrial User Survey Technical Memorandum

Schedule

BC will begin work immediately upon receipt of authorization to proceed from the City of Canton. The pretreatment program evaluation can begin concurrently with data review. Data gathering is anticipated to be completed in approximately 8 weeks but is dependent on when information is received from City of Canton and/or if additional sampling data is required. Implementation of the SAP is anticipated to be completed in 8 weeks, pending equipment and resource availability, accessibility, and lab turnaround. The local limits evaluation and/or development will be prepared within four weeks of receipt of all required information from City of Canton. The draft report will be completed within one month of completion of the local limits evaluation or development and then submitted to City of Canton for review. BC will finalize the report within two weeks after receipt of comments. Because there will be discussion of data and the possible derivation of the new local limits prior to preparation of the draft report, we anticipate that comments on the draft report will be largely editorial in nature and will not require substantial revisions. The project is anticipated to be completed in 12 months.

Compensation

BC will perform the Scope of Work described above on a Time and Materials basis for a not-to-exceed fee of **\$109,050.00** as detailed in the attached table. This budget was developed using the 2024/2025 rate schedule for the Professional Engineering Services Agreement between City of Canton and BC dated August 15, 2024.

Terms and Conditions

Contractual terms for this work are as described in the Agreement between City of Canton and BC dated August 15, 2024 and subsequent amendments.

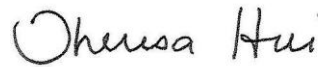
Bethany Watson
City of Canton Water and Sewer
July 23, 2025
Page 5

BC appreciates the opportunity to provide industrial pretreatment services to City of Canton. If you have any questions or need additional information, please call Theresa Hui at (770) 673-3636 or Craig Ferguson at (770) 673-3655.

Very truly yours,
BROWN AND CALDWELL



Erin H. Williams
Vice President



Theresa Hui, P.E.
Project Manager

ACCEPTED FOR CITY OF CANTON, GEORGIA:

Signature: _____

Printed Name: _____

Title: _____

Date: _____

Attachments
Breakdown of Fee

Canton GA IPP Support														
		Theresa Hui	Forrest Lindsey	Joshua Balentine	Laurel Rognstad	Anna Holdosh	Craig Ferguson	Michelle Payne	Jacob Danielson	Rhona Gonzales				
Phase	Phase Description	PM/ Principal Engineer	Sr Assoc Scientist	Sr. Mgr, Client Services	Sr Assoc Engineer	Sr. Staff Engineer	Sr. Director, Project Delivery	Tech Editor	Project Accountant	Project Assistant	Total Labor Hours	Total Labor Effort	Total Expense Effort	Total Effort
		\$235.00	\$160.00	\$250.00	\$185.00	\$145.00	\$260.00	\$85.00	\$95.00	\$130.00				
001	Data Review and SAP	16	40	8	8	0	0	0	0	0	72	13,640	504	14,144
	Sampling Option	0	40	0	0	0	0	0	0	0	40	6,400	2,260	8,660
002	Local Limits Evaluation and Development	30	80	12	24	0	0	0	0	0	146	28,118	1,022	29,140
003	Report	8	24	8	16	0	0	8	0	0	64	11,758	448	12,208
004	IPP Program Evaluation	8	60	12	24	0	0	0	0	0	104	18,920	728	19,648
005	IU Survey	4	8	2	0	80	0	0	0	0	94	14,320	658	14,978
006	PM	24	0	0	0	0	4	0	8	8	44	8,480	1,792	10,272
	GRAND TOTAL	90	252	42	72	80	4	8	8	8	564	101,635	7,412	109,050