

**BEFORE THE MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY**

**MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY
MISSISSIPPI STATE BOARD OF HEALTH**

COMPLAINANTS

vs.

NO. **4178**

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TOTAL ENVIRONMENTAL SOLUTIONS, INC.

RESPONDENT

AGREED ORDER

Come Now the Mississippi Commission on Environmental Quality (MCEQ), the Mississippi State Board of Health, (MSBH), and Total Environmental Solutions, Inc. (TESI) in the above captioned cause and agree as follows:

I. Background

A. MCEQ is an agency of the State of Mississippi created and existing pursuant to Miss. Code Ann. Section 49-2-5 (Rev. 1999) to institute and maintain proceedings in courts of appropriate jurisdiction for enforcement of the Air and Water Pollution Control Law, Miss. Code Ann. Sections 49-1 7-1 through 49-17-45 (Rev. 1999), regulations promulgated thereunder, permits issued by the Mississippi Environmental Quality Permit Board (Permit Board), and any orders issued pursuant to MCEQ authority. MCEQ is charged with the duty of carrying out the policies of Section 49-2-1 of the Mississippi Code for the prevention, control and abatement of any new or existing pollution of the air and waters of the State of Mississippi.

B. MSBH is an agency of the State of Mississippi created and existing pursuant to Miss.

Code Ann. Section 41-3-15 (Rev. 1999) and is charged with “the general supervision of the health interests of the people of the State.” MSBH is specifically charged with the enforcement of the Mississippi Safe Drinking Water Law of 1976 pursuant to Miss. Code Ann. Section 4 1-26-1 (Supp. 1999).

C. TESI is a wholly-owned subsidiary of South Louisiana Electric Cooperative Association (SLECA).

D. Johnson Properties, Inc. (JPI) is a Mississippi Corporation that owns either through itself or subsidiaries twenty sewage treatment plants (STPs) and fourteen drinking water plants (DWPs) in Mississippi (collectively referred to herein as “the Mississippi Systems”). The Mississippi Systems are currently being operated by Martin Schott, the receiver appointed by the United States District for the Western District of Louisiana, as a result of JPI’s failure to operate the systems in compliance with applicable federal and state laws and regulations. The Mississippi Systems are also assets in the bankruptcy filed by JPI in the United States Bankruptcy Court for the Middle District of Louisiana. Martin Schott was named as trustee in the JPI bankruptcy at the time he was appointed as the receiver over the systems. In accordance with the Amended Plan of Reorganization filed in the JPI bankruptcy and confirmed by the Bankruptcy Court for the Middle District of Louisiana, TESI was selected as the successful bidder to purchase all of JPI’s assets, including the Mississippi Systems.

E. The JPI STPs in Mississippi are required to hold a National Pollutant Discharge Elimination System (NPDES) permit issued by the Permit Board. The DWPs are regulated by the MSBH. Currently, most Mississippi Systems are generally not in compliance with their NPDES permits and applicable federal and state laws and regulations. TESI acknowledges that

most of the Mississippi Systems are not in compliance with applicable permits, certificates, and federal and state laws and regulations. TESI has committed to operate the Mississippi Systems without service interruption and to cause the Mississippi Systems to achieve compliance. TESI represents that it has made the necessary arrangements to secure adequate capital to meet its commitments under this Agreed Order. TESI represents that it has no business dealings or any other relationship with Glenn Kelly Johnson, or any of his family members, JPI, or any affiliated corporation, partnership, or business entity.

II.

No change in ownership, corporate, and/or partnership status relating to the Mississippi Systems covered by this order will in any way alter the responsibilities of TESI under this Agreed Order. In the event of any conveyance or easement, or other interest in any STP or DWP, or any portion of an STP or DWP, all of TESI's obligations under the Agreed Order shall remain in effect and shall continue to be met. Notwithstanding the previous two sentences, if one or more of the STPs or DWPs is acquired (a) by a municipal or public authority, and if acquisition is approved by the appropriate regulatory authority(s), including, but not limited to, MCEQ and MSBH, or (b) by a private party, and the acquisition is approved by the appropriate regulatory authority(s), including, but not limited to, MCEQ and MSBH, TESI shall have no further responsibility for the respective STPs or DWPs subsequent to the acquisition of the facility and the transfer of all necessary permits to the new owner by the Permit Board and/or MSBH. Any deed, title, or other instrument of conveyance executed by TESI which transfers title to any part of the STP or DWPs shall contain a notice that the STP and/or DWP is the subject of this Agreed Order.

III.

A. The purpose of this Agreed Order is to cause the STPs and DWPs to achieve compliance with all federal and state laws, regulations, and permits by allowing TESI to establish a plan to achieve full compliance with state law, NPDES permit limitations, the federal Clean Water Act, the federal Safe Drinking Water Act, and this Agreed Order. By executing this Agreed Order, the parties agree that no enforcement action will be taken against TESI by MCEQ or MSBH, as long as TESI complies with this Agreed Order and does not commit violations outside the scope contemplated in this Agreed Order. Otherwise, MCEQ and MSBH may pursue an enforcement action against TESI. This Agreed Order does not authorize TESI to violate any statute, regulation or permit requirement, but creates an approved compliance schedule for the elimination of existing violations. MCEQ and MSBH do not guarantee that compliance with the conditions of this Agreed Order will insure TESI's compliance with any applicable law or regulation.

B. TESI's obligation to comply with the provisions of this Agreed Order shall be deferred to the extent and for the duration that the delay in compliance is caused by a "force majeure" event.

"Force majeure," for purposes of this Agreed Order is defined as any event arising from causes beyond the control of TESI or of any entity controlled by TESI, including, but not limited to, its agents, consultants and contractors, that delays or prevents the performance of any obligation under this Agreed Order despite TESI's best efforts under the circumstances to fulfill the obligation. The requirement that TESI exercise "best efforts to fulfill the obligation" includes using best efforts to anticipate any potential force majeure event and best efforts to

address the effects of any potential force majeure event: (1) as it is occurring; and (2) following the potential force majeure event, such that the delay is minimized to the greatest extent possible. Force majeure shall not apply to any delay due to increased costs or TESI's financial inability to carry out the provisions of this Agreed Order, normal precipitation events, or to TESI's failure to make timely and bona fide applications and to exercise diligent effort to obtain permits. It is expressly understood that force majeure *events* do not include reasonably foreseeable plant upsets, equipment failures, operator errors, and contractor disputes that could be avoided by TESI's best efforts to anticipate or address such events.

TESI shall notify MCEQ and MSBH within 72 hours by telephone and shall submit written notification within seven business days after the date when it first obtained knowledge of a delay or potential delay. Such notice shall include the nature, cause and anticipated length of the delay and steps which TESI has taken and will take, with a schedule for implementation, to avoid or minimize the delay. Failure to provide this written notice within the required time period shall constitute a waiver of TESI's right to invoke "force majeure" as a basis for delay or prevention of performance under this Agreed Order. If all parties agree that the delay was attributable to a "force majeure" event, the time for performance of the provision shall be extended for a period of time equal to the delay caused by the event plus any period of time necessary for any demobilization and remobilization. If the parties do not agree that the delay or inability to perform was caused by "force majeure" event, or are unable to agree on the extent of delay, TESI shall have the burden of proving that the delay was attributable to a "force majeure" event, that TESI has exercised due diligence in minimizing the delay, and that, as a result of the delay, a particular extension period for compliance is required.

IV. GENERAL

A. All time frames set forth in this Agreed Order are dependent upon approval by the appropriate regulatory agencies of submitted plans within a reasonable period of time. TESI commits to submitting plans in a timely and diligent fashion.

B. TESI will drill water wells determined necessary to address capacity needs in accordance with the tests and/or studies described herein, but reserves the right to address capacity issues by other means where appropriate. For example, TESI will actively install water meters and expects to see a reduction in consumption.

C. TESI agrees to take such actions that may be necessary to bring the facilities into compliance with all applicable federal and state permits, laws and regulations in accordance with the compliance schedule as set forth in this Agreed Order that is reasonable and workable in light of the current conditions of the STPs and DWPs.

D. TESI understands that a moratorium is in place regarding capacity for the following systems: Lakewood (Wimdance), Ocean Beach, Gulf Park, Clermont Harbor, Rouse, Pass Christian Isles, Oak Harbor, and Langley Point. Until further notice from the appropriate regulatory agency, the aforementioned moratorium will remain in effect. As the capacity of the systems increases beyond the customer base currently being served, the regulatory agency will remove the moratorium as appropriate.

F. In accordance with the time frames included in the compliance schedule as incorporated in this Agreed Order, TESI shall submit to MCEQ and MSBH a report documenting TESI'S compliance with all of the requirements listed for that particular time frame within thirty days after each time period expires.

G. The compliance requirements addressed in this Agreed Order shall be completed within the specified period of time. The effective date for such time periods to begin shall be the closing date of the conveyance of the Mississippi Systems to TESI.

V. COMPLIANCE REQUIREMENTS

A. Requirements to be Implemented Immediately.

(1) Upon the closing of the purchase of JPI's assets, TESI shall take over operations formerly undertaken by J-PI, and use its best efforts to ensure that services to the public are not interrupted and services to the public do not deteriorate during or after the transition. In addition, TESI shall not:

(a) Retain Darren K. Johnson, Glenn K. Johnson or Michael Johnson (collectively, the "Johnsons"), or any member of their immediate family, as an employee, consultant, advisor, agent, representative, or in any other capacity whatsoever; or

(b) Sell, lease or transfer ownership to or control over, in whatever form, any of the STPs or DWPs to (i) JPI or any subsidiary, partnership, corporation, or any other business entity related to the Johnsons or JPI; (ii) any of the Johnsons or any member of their immediate family; (iii) any entity in which any of the persons or entities described in (i) or (ii) have an ownership interest; (iv) any person or entity directly or indirectly owned or operated by, partnered with, or affiliated in any way with any persons or entities described in (i) or (ii); or (v) any other person or entity who TESI has reason to believe may transfer ownership or control over any of the STPs or DWPs to a person or entity described in clauses (i) or (iv).

(2) At the time JPI assets are conveyed to TESI, TESI shall take the actions described below.

(a) TESI shall conduct and maintain all sampling, monitoring and reporting activities as required by the applicable discharge permits, and federal and state law, including but not limited to Discharge Monitoring Reports (DMRs), noncompliance reports and/or required drinking water analyses and/or reports. All sampling, monitoring and reporting will be performed and completed in the time and method specified in the applicable discharge permits or environmental or health regulations. Within ninety days, TESI shall insure that all systems are maintaining records as required by statute, regulation, and/or permit.

(3) TESI shall ensure that all chlorine dispensers at the STPs and DWPs are kept supplied with sufficient chlorine and/or other approved disinfectant, and shall commence a survey to identify all STPs that lack properly functioning disinfection equipment. TESI shall commence installation or repair of such equipment where needed as soon as practicable.

(4) TESI shall make available to all Mississippi systems all spare parts inventories (including pumps, aerators, etc.) currently maintained.

(5) TESI shall provide to MCEQ and MSBH a list of each certified operator employed by it and the facilities for which he/she is responsible.

B. Water System Requirements:

(1) TESI agrees to the terms and timetables as listed below and also in Exhibit A, provided, however, that if a more restrictive time frame is set forth for correcting a system specific deficiency, the more restrictive timetable will apply.

(a) Ensure that all systems have functioning disinfection within 3 months.

(b) Make back up and spare parts readily available for Mississippi systems within 6 months.

- (c) Provide adequate and properly trained staff for Mississippi systems within 6 months. **Staff** shall be certified, if required by law, within 6 months.
- (d) Provide within 9 months an Operator's Handbook that sets forth all necessary components of a comprehensive maintenance plan that includes, but is not limited to, proper chlorination (or other approved disinfection), flushing of dead end lines; inspection of pressure tanks, sampling, duties that must be performed by a certified operator, and the provision of security fencing.
- (e) Prepare a plan for emergency backup for systems that need such plan within 12 months and implement that plan within 24 months.
- (f) Ensure that all systems have adequate and functioning chlorination at all systems within 12 months.
- (g) Properly abandon all inactive water wells within 24 months.
- (h) All pressure tanks shall be inspected within 36 months.
- (i) TESI shall complete pumping tests on its water systems within 36 months of obtaining title. Other engineering studies will be done on an as needed basis.
- (j) All systems shall be metered within 60 months.

System Specific Deficiencies:

- (1) Beach Bayou: Deficiencies to be corrected within 24 months
 - (a) Fill in hole(s) in front of well site(s).
- (2) Bryandale: Deficiencies to be corrected within 24 months
 - (a) No new customers may be added until additional capacity is established and approval is obtained from MSBH.

(b) Provide adequate capacity for existing connections.

(3) Clermont Harbor: Deficiencies to be corrected within 12 months

(a) Water well sites must be properly graded to divert standing water from the wells.

(b) No new customers may be added until additional capacity is established and approval is obtained from MSBH.

(c) Provide adequate capacity for existing connections.

(d) Provide approved chlorination facilities.

(4) DiscoveryBay Deficiencies to be corrected within 24 months

(a) Submit plans to provide water service to certificated area.

(5) Gulf Park: Deficiencies to be corrected within 12 months

(a) Provide adequate capacity for existing connections.

(b) TESI shall bring pump operation in permit compliance either through replacement of pumps or by modification of the existing pumps.

(c) No new customers may be added until additional capacity is established and approval is-obtained from the Mississippi State Department of Health (MSDH).

(d) The Marina Street pump/pressure tank must be repaired or replaced.

(e) Water wells not in service must be properly abandoned.

(6) Lakewood Windance Deficiencies to be corrected within 3 months

(a) Complete a new water well.

(b) Pressure tank must inspected and properly repaired.

- (7) Oak Harbor: Deficiencies to be corrected within 24 months
- (a) Provide plans, in writing, to increase pressure and provide chlorination,
 - (b) Provide adequate capacity for existing connections.
- (8) Ocean Beach: Deficiencies to be corrected within 6 months
- (a) Obtain MSDH approval and install proper water distribution lines.
 - (b) Provide engineering certification of new water well constructed along with documentation and water well information for well #3.
 - (c) No new customers may be added until additional capacity is established and approval is obtained from MSDH.
- (9) Pass Christian Isles: Deficiencies to be corrected within 12 months
- (a) Provide adequate capacity for existing connections.
 - (b) No new customers may be added until additional capacity is established and approval is obtained from MSDH.
 - (c) The holes for the electrical wiring must be sealed.
- (10) Rouse: Deficiencies to be corrected within 12 months
- (a) Provide adequate capacity for existing connections.
 - (b) No new customers may be added until additional capacity is established and approval is obtained from MSDH.
- (11) Seashore-Langley Point: Deficiencies to be corrected within 24 months
- (a) Submit plan for additional capacity (a new well or emergency tie in) unless submitted pump tests indicate otherwise.
 - (b) Electrical wires must be placed in conduit.

(c) Erosion around the tank must be repaired.

(12) White Cypress: Deficiencies to be corrected within 24 months

(a) Dead end lines must be routinely flushed.

(13) White Oak: Deficiencies to be corrected within 24 months

(a) Submit plans to provide water service to certificated area.

C. Wastewater Systems:

(1) TESI agrees to the terms and timetables as listed below and in Exhibit A, provided, however, that if a more restrictive time frame is set forth for correcting a system specific deficiency, the more restrictive timetable will apply.

(a) Ensure that all STPs have functioning disinfection within 90 days.

(b) Submit a solids control plan to MDEQ within 90 days.

(c) Ensure that all applications for permits, where required, are filed with the Mississippi Department of Environmental Quality (MDEQ) within 90 days.

(d) Implement the solids control plan as approved by MDEQ within 6 months.

(e) Provide adequate and properly trained staff and operators must be certified as required by law and/or regulation within 6 months.

(f) Achieve permit compliance for 7 systems within 8 months in accordance with Exhibit A.

(g) Complete improvements necessary to insure that adequate backup or auxiliary facilities have been installed, including but not limited to pump, blowers, electrical controls, panels, alarms, timers, and switches, and all capital improvements which are necessary to maintain compliance with such STPs

permits for 7 systems within 8 months in accordance with Exhibit A.

(b) Provide within 9 months an Operator's Handbook that sets forth all necessary components of a comprehensive maintenance plan that includes, but is not limited to, proper chlorination (or *other* approved disinfection), certified operators, security, lawn maintenance, adequate dikes, alarm systems, and sludge handling and disposal.

(i) Establish an ongoing I&I (Infiltration/Inflow) program that includes smoke testing and repair of disclosed problems. The program shall be in place within 9 months and TESI shall begin systematically testing the facilities in accordance with the priority established in this Agreed Order.

(j) Obtain service pumps within 9 months.

(k) Ensure that all systems have adequate and functioning chlorination at all systems within 12 months.

(l) Post required signs at all of the Mississippi systems within 12 months.

(m) Achieve permit compliance for 7 systems within 16 months in accordance with Exhibit A.--

(n) Complete improvements necessary to insure that adequate backup or auxiliary facilities have been installed, including but not limited to pump, blowers, electrical controls, panels, alarms, timers, and switches, and all capital improvements which are necessary to maintain compliance with such STPS permits for 7 systems within 16 months in accordance with Exhibit A.

(o) Achieve permit compliance for 6 remaining systems within 24 months in

accordance with Exhibit A.

(p) Complete improvements necessary to insure that adequate backup or auxiliary facilities have been installed, including but not limited to pump, blowers, electrical controls, panels, alarms, timers, and switches, and all capital improvements which are necessary to maintain compliance with such STPs permits for remaining 6 systems within 24 months in accordance with Exhibit A.

System Specific Deficiencies:

(1) Bernard Acres: Deficiencies to be corrected within 16 months

(a) System must be repaired in order to prevent sewage from leaking on the ground around lift station.

(b) Aeration cell must be cleaned.

(c) System must maintain dike freeboard between 2 and 3 feet.

(2) Blakely: Deficiencies to be corrected within 16 months

(a) Effluent structure walkway must be replaced.

(b) Effluent pipe must be replaced (pipe is broken at creek).

(3) Discovery Bay: Deficiencies to be corrected within 24 months

(a) Submit a plan to replace the existing facility.

(b) No new customers may be added until the new facility is installed and approval is obtained by MDEQ.

(4) Dogwood: Deficiencies to be corrected within 24 months

(a) Drainage/sewage discharge must be stopped.

(b) Effluent must discharge at weir at all times.

- (5) Gulfpark: Deficiencies to be corrected within 16 months
- (a) Take ail necessary action to prevent bypasses.
 - (h) Submit a closure plan (including plan for proper sludge disposal).
- (6) Jourdan River Shores: Deficiencies to be corrected within 8 months
- (a) Sludge discharge into Jourdan River must stop.
 - (b) System must implement a routine sludge disposal procedure.
 - (c) Settling tank and skimmer must be repaired and/or replaced.
 - (d) Weirs must be cleaned.
 - (e) System must install a bar screen.
 - (f) No new customers may be added until approval is obtained from MDEQ.
- (7) Lakewood (Windance): Deficiencies to be corrected within 16 months
- (a) All appropriate action must be taken to prevent further bypasses.
 - (b) Large floating debris in pumping station on lot 66 must be removed.
 - (c) System must install an aerator for second cell.
 - (d) Effluent v notch in settling cell must be upgraded.
 - (e) Settling cell must be cleaned out.
 - (f) Walkway must be repaired.
- (8) Oak Forrest (School): Deficiencies to be corrected within 8 months
- (a) Vegetation must be cut on dikes.
 - (b) Provide and maintain adequate disinfection.
 - (c) System must install a secure fence and ensure that it is locked at all times.

(9) Oak Hills (Oak Grove): Deficiencies to be corrected within 16 months

(a) Must improve access to chlorine contact chamber.

(10) Oak Park Subdivision: Deficiencies to be corrected within 8 months

(a) Submit documentation indicating the feasibility of the City of Vicksburg acquiring the system.

(b) System must install a bar screen.

(c) Aeration tank must be cleaned out properly.

(d) System must install/maintain a digester.

(e) System must install/maintain 3 operable paddle wheels.

(f) System must repair the effluent structure.

(g) Access road condition must be improved.

(h) Leaks in the system's line (including line from lagoon to chlorine contact chamber) must be repaired.

(i) System must install a flow device.

(j) Leak in oxidation ditch must be repaired.

(k) System must be painted.

(l) All appropriate action must be taken to prevent bypasses.

(11) Pleasant Valley: Deficiencies to be corrected within 8 months

(a) Discharge to receiving stream must be improved.

(b) Floating debris must be removed from oxidation ditch and aeration basin.

(c) Settling tank must be cleaned and repaired.

(12) Riviera Heights: Deficiencies to be corrected within 24 months

- (a) Remove duckweed from settling cell.
- (b) Submit a report detailing the number of customers served and the design capacity of the treatment facility.

(13) Seashore Utility (Oak Harbor): Deficiencies to be corrected within 8 months

- (a) Repair to proper operating capacity.
- (b) Systems must install/maintain an influent bar screen and comminutor.
- (c) All sand and mud must be removed from the system.
- (d) System must install/maintain a digester.
- (e) System must install belt housing over blower.
- (f) System must repair or replace skimmner.
- (g) System must maintain an operable sludge collection system.
- (h) System must repair or replace effluent structure.
- (i) System must replace the blower drive belts.
- (j) Rusted areas in system must be repaired to prevent bypass.
- (k) System cannot use above ground PVC pipe to connect a nearby manhole to the plant.
- (l) Influent trough must be cleaned out properly.
- (m) Broken mains must be replaced.

(14) Sunset Utilities: Deficiencies to be corrected within 8 months

- (a) Lift station must be repaired and upgraded.

(b) TESI agrees to undertake a study that addresses the need to install a pumping station in the northwest corner of the system and will agree to install such a station, if MDEQ determines a need based on the study, within 24 months of acquisition of the systems.

(c) System must perform a smoke test and repair main lines and taps.

(d) Take all appropriate measures to prevent bypasses.

(e) Must post notice sign at the facility.

(f) Repair leak in influent pipe between the pump station and the lagoon.

(15) Timber Creek: Deficiencies to be corrected within 24 months

(a) System must repair the effluent structure.

(16) Wilkinson: Deficiencies to be corrected within 24 months

(a) Check integrity of the dams and stabilize.

(b) Effluent pipe from cell one must be repaired to reach settling cell.

(c) All leaks in the system must be repaired.

(d) Final effluent must not bypass chlorine contact chamber.

(e) Effluent structure and effluent pipe must be repaired.

(17) White Oak Subdivision: Deficiencies to be corrected within 16 months

(a) System must remove trees from levee on south side.

(18) Woodglen Apartments: Deficiencies to be corrected within 24 months

(a) Final effluent pipe must be cleaned.

(b) System must maintain freeboard between 2 and 3 feet in all areas.

(19) Woodland Acres: Deficiencies to be corrected within 8 months

- (a) Lift station pipe must be repaired or replaced.
- (b) Continued action must be taken to prevent raw sewage from discharging on the ground.
- (c) System must be cleaned out and effluent discharged immediately after chlorination.
- (d) Remove solids from holding tank prior to discharge.
- (e) Settling cell must be repaired or replaced
- (f) Solids must be removed from aeration basin.
- (g) Must ensure that there is adequate mixing in aeration.
- (h) Must paint plant.
- (i) Replace weirs of settling cell.
- (j) Pipes in plant must be replaced.
- (k) Sludge collection system must be repaired or replaced.
- (l) Must clean or replace bar screen.

SO ORDERED, this the 28th day of November, 2000.

MISSISSIPPI COMMISSION ON ENVIRONMENTAL QUALITY

[Handwritten Signature]

MISSISSIPPI STATE BOARD OF HEALTH

B. E. Thompson Jr. MD

AGREED, this 28th day of November, 2000.

TOTAL ENVIRONMENTAL SOLUTIONS, INC.

BY: *[Handwritten Signature]*

TITLE: Chief Executive Officer

STATE OF Louisiana

COUNTY/PARRISH OF Terrebonne

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named Paul E. Maeder who first being duly sworn, did state upon his/her oath and acknowledge to me that he/she is the Chief Executive Officer of Total Environmental Solutions, Inc. and is authorized by that Corporation to sign this Agreement.

SWORN TO AND SUBSCRIBED BEFORE ME, this the 28th day of November, 2000.

[Handwritten Signature]
NOTARY PUBLIC

MY COMMISSION EXPIRES :

[Handwritten Signature]

Exhibit A

Drinking Water Systems

<u>SYSTEM</u>	<u>LOCATION</u>	<u>TIME FRAME</u>
Lakewood (Windance)	Harrison	3 months
Ocean Beach	Jackson	6 months
Gulf Park	Jackson	12 months
Clermont Harbor	Hancock	12 months
Rouse	Jackson	12 months
Jourdan River Shores	Hancock	12 months
Pass Christian Isles	Harrison	12 months
Bryandale	Adams	24 months
White Cypress	Hancock	24 months
Oak Harbor	Hancock	24 months
Beach Bayou	Jackson	24 months
White Oak	Tunica	24 months
Discovery Bay	Harrison	24 months
Seashore-Langley Point	Jacksori	24 months

Sewage Treatment Plants

System	<u>Location</u>	<u>Time Frame</u>
Jourdan River Shores	Hancock	8 months'
Oak Forrest (School)	Lamar	8 months
Seashore (Oak Harbor)	Hancock	8 months
Sunset	Oktibbeha	8 months
Woodland Acres	Rankin	8 months
Oak Park	Warren	8 months
Pleasant Valley	Warren	8 months
Oak Hills (Oak Grove)	Lamar	1 6 m o n t h s
White Oak	Tunica	16 months
Gulf Park	Jackson	16 months
Lakewood (Windance)	Harrison	16 months
Lower Woodville	Adams	16 months
Bernard Acres	Warren	16 months
Blakely	Warren	16 months
Discovery Bay	Harrison	
Dogwood	Warren	
Woodglen	Warren	

Within this time period, capacity needs will be studied by TESI in light of regional developments and an assessment with recommendations will be made to MDEQ at the conclusion of the 8 months.

Timbercreek

Warren

24 months

Riviera Heights

Warren

24 months

Villanova

Warren

24 months