

Six-Month Status Report #17 (03/01/2016 – 08/31/2016)

Report Submitted to the following:	
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From:	
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APPENDIX 1

Summary to include the following:

1. Consent Decree Requirements for Reporting Period (03/01/16 – 08/31/16)
2. General Description of Work Completed during the Reporting Period (03/01/16 – 08/31/16)
3. Description of Projected Work to be Performed in the Next Six-Months (03/01/16 – 08/31/16)

APPENDIX 2 – Reports submitted to IDEM during the Reporting Period

APPENDIX 3 – Operations and Maintenance Report on Collection System Activity

1. CONSENT DECREE COMPLIANCE (Section XII, Paragraph 34 (a))

A statement setting forth (i) the deadlines and other terms that Fort Wayne has been required by this Consent Decree to meet since the date of the last statement; (ii) whether and to what extent Fort Wayne has met those requirements; and (iii) the reasons for any noncompliance.

The attached Appendix 1 includes a summary of the City of Fort Wayne's (the "City's") compliance with applicable Consent Decree deadlines and terms from March 1, 2016 – August 31, 2016 (the "Reporting Period"). The City believes that it has met all Consent Decree deadlines during the Reporting Period. The City believes that it also met other terms required by the Consent Decree, but did experience the discharges described at item 6 below during the Reporting Period. Explanations for those discharges are provided at item 6.

2. GENERAL DESCRIPTION OF WORK (Section XII, Paragraph 34 (b))

(i) A general description of the work completed within the prior six-month period; (ii) to the extent known, a statement as to whether the work completed in that period meets applicable Design Criteria; and (iii) a projection of work to be performed pursuant to this Consent Decree during the next six-month period.

The attached Appendix 1 includes a general description of work completed during the Reporting Period and statements as to whether the completed work met applicable Design Criteria.

Appendix 1 also includes a description of the projected work to be performed in the next six-month period. The described activities are, of course, in addition to the continuing activities of the City under its NPDES permit, CMOM and CSSOP. By way of a letter dated February 26, 2016, the City asked EPA to consider certain modifications to CSO Control Measure 9. A response from EPA is expected during the next Reporting Period.

3. REQUEST FOR WATER QUALITY STANDARDS REVISION (Section XII, Paragraph 34 (c))

A statement as to Fort Wayne's understanding regarding the status of IDEM's response to the City's request for a revision to water quality standards in accordance with Section 5 of the City's Long-Term Control Plan.

As previously reported, the City held two public participation meetings on February 17, 2010. A 30-day public comment period followed and concluded March 17, 2010. The only written comment received was from a Fort Wayne citizen in support of the proposed UAA.

Subsequently, on May 6, 2010, a final version of the UAA proposal was submitted to IDEM. The submittal was followed by a meeting on June 8, 2010 between the City and IDEM to discuss future steps in the rule change process. On August 30, 2010 IDEM issued the City a letter stating, in relevant part:

“Based on the information contained in the City’s UAA, IDEM finds that Fort Wayne has provided sufficient information to propose changing the designated recreational use for the above mentioned waters from ‘full body contact’ to the ‘Combined Sewer Overflow (CSO) Wet Weather Limited Use’ subcategory of Indiana’s recreational use designation as provided in IC 13-18-3-2.5 during storm events that exceed the level of control in the City’s approved Long-Term Control Plan (LTCP).”

The City met with IDEM again on August 31, 2010 to discuss a schedule to complete the UAA rule change process in 2010. The City understands that IDEM has provided EPA Region V with a draft proposed rule and that EPA is currently evaluating the same.

Notwithstanding EPA’s involvement in the UAA throughout its development, EPA posed new questions regarding the City’s UAA in late 2010 requesting additional information. The City, IDEM and EPA met to discuss EPA’s request on January 11, 2011. Additional meetings and dialog with EPA have followed, including on January 26, 2012, February 21, 2012, June 13, 2012 and February 27, 2013. As required by the Consent Decree, the City submitted a 6-Year Capital Cost Report to EPA and IDEM on December 31, 2013. Further dialog with EPA and IDEM concerning the UAA occurred during the Reporting Period and is expected to continue throughout the next reporting periods.

4. CSO CONTROL MEASURES NOTICE TO PROCEED (Section XII, Paragraph 34 (d))

A description of any notices to proceed for any CSO Control Measure or measures specified in Appendix 3 that Fort Wayne has revoked in the prior six-month period, and a description of the status of Fort Wayne’s compliance with Section XXI.F with regard to issuance of a new notice to proceed.

The City did not revoke a notice to proceed during this reporting period.

5. POST-CONSTRUCTION MONITORING PROGRAM (Section XII, Paragraph 34 (e))

Information generated in accordance with the Post-Construction Monitoring Program.

Ongoing monitoring programs have continued as outlined in Appendix 4 of the Consent Decree.

Post-Construction monitoring for CSO Control Measures 7 & 8 – St. Joseph Relief Sewers will begin January 2016 per the following general plan:

- As described in the Post-Construction Monitoring Program (Appendix 4 of the Consent Decree), post-construction monitoring will make use of the City’s ongoing CSO outfall flow monitoring program.
- Pre-construction overflow monitoring data for CSOs 045, 051, 052, 053, and 068 will be summarized for full calendar years prior to initiation of construction, i.e. through the end of 2013, along with rainfall measures for the associated period.
- Post-construction overflow monitoring data collection began at these CSOs in January 2016. These CSOs are also inspected after each rain event to confirm compliance. This data will be reviewed during the year on an ongoing basis, along with associated rainfall data. The results of this review will be summarized in the first quarter of 2017.
- The goal of the review and summary will be to comment on the overflow reduction realized at CSOs 045, 051, 052, 053, and 068 through implementation of CSOCM 7 & 8, and the post-construction performance of these CSOs relative to performance criteria. Various CSO metrics (e.g., activations per year and overflow volume per year) will be tabulated along with rainfall metrics (e.g. total annual depth). These relationships for 2016 will then be compared back to the same relationships for the pre-construction period.
- This data review and summary will continue on an annual basis beyond 2016, allowing the City to build an archive documenting the performance of the St. Joseph CSOs relative to annual rainfall metrics.
- The data summaries and conclusions described above will need to account for the fact that the performance criteria are defined in terms of a “typical” year, whereas any real precipitation year will likely have characteristics that are not “typical”. For example, if 2016 emerges as a very wet year in terms of total rainfall, the St. Joseph CSOs may exceed the “typical year” performance criteria for that single year.
- The overflow data collected in 2016, along with data from the City’s long-term flow monitoring program, will also serve as the basis for applying the model-based approach to assessing compliance for the St. Joseph River CSOs as outlined in Section 4.6.4.1 of the Post-Construction Monitoring Program. As explained in that section, the model-based approach is the formal mechanism for assessing compliance with the “typical” year performance criteria. The results of this assessment will be presented in the Milestone Report for the St. Joseph River Watershed, to be submitted by the end of 2017 as outlined in Section 4.6.6.1 of the Post-Construction Monitoring Program.

6. REPORTS SUBMITTED TO IDEM IN PREVIOUS SIX MONTHS (Section XII, Paragraph 35)

Fort Wayne shall also submit, with each written status report, copies (to EPA only) of all Monthly Monitoring Reports and other reports pertaining to CSOs, SSDs, and bypasses that Fort Wayne submitted to IDEM in the previous six months.

The attached Appendix 2 contains numbered copies of monthly monitoring and other reports submitted to IDEM concerning the Reporting Period pertaining to CSOs, discharges from the City's separate sanitary sewer system, and bypasses. Additional information regarding the discharges described on the reports included within Appendix 2 follows.

The City experienced a 100-year storm during the Reporting Period. Specifically, the City received 3.66 inches of rain during the evening of May 10th, 2016, including 3.36 inches in less than two hours. A total of nineteen unavoidable discharges occurred in connection with that extraordinary storm event (report numbers 8 through 26). Only one of those nineteen discharges reached a regulated water body (report number 10.) Ten of the remaining eighteen discharges, all of which were reported at IDEM's request for informational purposes, concerned reported basement backup events which may have been caused by private laterals of homeowners (report numbers 11, 12, 13, 15, 17, 18, 19, 20, 21, and 23).

The remaining incident reports submitted during the Reporting Period (report numbers 1-7 and 27 - 30) also concerned discharges which did not reach a regulated waterbody but were reported for information purposes. Of those, five (report numbers 1, 2, 4, 7 and 30) appear to have concerned basement backup events.

In addition to responsive activities identified in the submitted reports, the City continues to distribute numerous grease control kits to residents in areas proximate to identified blockages, college residence halls, apartment complexes, and neighborhood associations. The kits include educational materials (translated when appropriate) and lids to facilitate home grease collection.

7. OPERATIONS AND MAINTENANCE REPORT ON COLLECTION SYSTEM ACTIVITY

Although not required by the Consent Decree, the City is pleased to include tables at Appendix 3 respectively depicting the City's general progress towards its operations and maintenance activities goals as well as a listing of completed regulator and lift station inspections March 1, 2016 – August 31, 2016.

8. CERTIFICATION STATEMENT (Section XII, Paragraph 38)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Kumar Menon, Director of City Utilities

Date

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APPENDIX 1

Below are general descriptions of the following (I) Consent Decree compliance requirements for Reporting Period; (II) work completed during the Reporting Period; and (III) work anticipated to be performed during the next Reporting Period.

I. CONSENT DECREE COMPLIANCE FOR THIS REPORTING PERIOD

The City achieved compliance with all CSO Control Measure requirements during the Reporting Period and continued to timely development and implement contemplated controls.

II. WORK CONTEMPLATED BY CONSENT DECREE APPENDIX 3 AND APPENDIX 5 COMPLETED DURING THIS REPORTING PERIOD

CSO Control Measure 6 – CSSCIP – Basins Tributary to Parallel Interceptor – (partial separation projects identified as cost-effective components of the Combined Sewer System Capacity Improvements Program). Note: The below listing includes one or more outfalls which the City is voluntarily working to improve in connection with this CSO Control Measure although such is not required by the Consent Decree.

- CSO Outfalls 007 (phase ii) & 056 (phase ii) – Construction was completed.
- CSO Outfall 026 – Construction of partial separation was completed; outfall permanently abandoned.
- CSO Outfalls 027 (phase i) & 033 (phase i) – Final design continued.
- CSO Outfalls 027 (phase ii) & 033 (phase ii) – Final design continued.
- CSO Outfall 048 (although not required by the Consent Decree, the City is voluntarily undertaking additional separation work for this outfall) – Final design continued.

CSO Control Measure 9 – Satellite Disinfection – (Satellite disinfection facilities)

- CSO Outfalls 061 and 062 – Final design continued.
- CSO Outfall 054 – Advanced facilities planning continued to optimize final control technologies accounting for flow reductions resulting from implementation of CSSCIP under CSO Control Measure 4.

CSO Control Measure 10 – Morton Street/O10101 Reroute – (Reroute overflow pumps station discharge to Wet Weather Pond 1)

- CSO Outfall 048 – Consultant was selected and preliminary design began.

CSO Control Measures 11 & 12 – Wayne Street & St. Mary’s Parallel Interceptors – (Parallel interceptors to capture combined sewer overflows for conveyance to WPCP/Wet Weather Ponds)

Wayne Street (West of WPCP)/3RPORT

- Public outreach continued.
- Tunnel & Drop Shafts Package – Final design continued.
- Consolidation Sewers Package(s) – Final design continued.
- Deep Dewatering Pump Station Package – Final design continued.

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Wayne Street (East of WPCP)

- Bids were received and construction began.

St. Mary's (Foster Park Relief Sewer)

- Final design continued.

CSO Control Measure 13 – Late Floatables Control – (Overflow-specific solids and floatables controls)

- CSO Outfalls 058 & 060 – Bids were received and construction began.
- CSO Outfalls 061 & 062 – Final design continued.

CSO Control Measure 14 – Satellite Storage – (Satellite storage facilities)

- CSO Outfall 064 – Advanced facilities planning continued to optimize final control technologies accounting for flow reductions resulting from implementation of CSSCIP under CSO Control Measure 4.

Warfield SSD System – Outfalls 070 & 071

- Although not required by the Consent Decree, the City is working to further improve the collection system in this area.
- Construction of sewer and storm improvements in the Hillcrest Neighborhood were completed.

Rothman SSD System – Outfalls 072, 073, 074, 075, 076

- Although not required by the Consent Decree, the City is working to further improve the collection system in this area.
- Performed additional field work, flow metering, lift station performance analyses, and completed refinement of the hydraulic model.
- Completed design on CIPP Project.

North Maumee SSD System – Outfalls 077 & 078 (criteria to be met by December 31, 2020)

- Advanced facility planning continued.
- Cleaning project (phase i) – Project was completed.
- Cleaning project (phase ii) – Final design continued.

III. WORK CONTEMPLATED BY CONSENT DECREE APPENDIX 3 AND APPENDIX 5 ANTICIPATED FOR COMPLETION DURING THE NEXT REPORTING PERIOD

CSO Control Measure 6 – CSSCIP – Basins Tributary to Parallel Interceptor - (Partial separation projects identified as cost-effective components of the Combined Sewer System Capacity Improvement Program) Note: the below listing includes one or more outfalls which the City is voluntarily working to improve in connection with this CSO Control Measure although such is not required by the Consent Decree.

- CSO Outfalls 027 (phase i), & 033 (phase i) – Final design to be completed.

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- CSO Outfalls 027 (phase ii) & 033 (phase ii) – Final design to be completed.
- CSO Outfall 048 (although not required by the Consent Decree, the City is voluntarily undertaking additional separation work for this outfall) – Final design will be completed, bids will be received and construction to begin.

CSO Control Measure 9 – Satellite Disinfection – (Satellite disinfection facilities)

- CSO Outfall 054 – Preliminary engineering to begin on satellite storage tank. Advanced facilities planning continued to optimize final control technologies accounting for flow reductions resulting from implementation of CSSCIP under CSO Control Measure 4.
- CSO Outfalls 061 and 062 – Final design will be completed, bids will be received and construction to begin.

CSO Control Measure 10 – Morton Street/O10101 Reroute – (Re-route overflow pumps station discharge to Wet Weather Pond 1)

- CSO Outfall 048 – Complete preliminary design and final design to begin.

CSO Control Measures 11& 12 – Wayne Street and St. Mary’s Parallel Interceptors – (Parallel interceptors to capture combined sewer overflows for conveyance to WPCP/Wet Weather Ponds)

Wayne Street (West of WPCP)/3RPORT

- Public outreach to continue.
- Tunnel & Drop Shafts Package – Final design will be completed and bids will be received.
- Consolidation Sewers Package(s) – Final design will continue.
- Deep Dewatering Pump Station Package – Final design will continue.

Wayne Street (East of WPCP)

- Construction will continue.

St. Mary’s (Foster Park Relief Sewer)

- Final design to continue.

CSO Control Measure 13 – Late Floatables Control – (Overflow-specific solids and floatables controls)

- CSO Outfalls 058 & 060 – Construction will continue.
- CSO Outfalls 061 & 062 – Final design will be completed, bids will be received and construction to begin.

CSO Control Measure 14 – Satellite Storage – (Satellite storage facilities)

- CSO Outfall 064 – Advanced facilities planning to continue to optimize final control technologies accounting for flow reductions resulting from implementation of CSSCIP under CSO Control Measure 4.

Warfield SSD System – Outfalls 070 & 071

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- Finish restoration work in conjunction with Hillcrest Neighborhood improvements.

Rothman SSD System – Outfalls 072, 073, 074, 075, 076

- Continue I/I removal projects.
- Evaluate possible additional system improvement projects.
- Bid and construct CIPP project.

North Maumee SSD System – Outfalls 077 & 078

- Advanced facility planning to continue.
- Cleaning project (phase ii) – Final design to be completed and preparation for bids to occur.