



**Environmental
Protection Agency**

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

Re: Lucas County
Collins Park WTP/City of Toledo
Construction/MS4
Storm Water

March 2, 2012

Mr. Andrew McClure
City of Toledo
Division of Water Treatment
3040 York Street
Toledo, Ohio 43605

And

Ms. Patekka Pope Bannister
City of Toledo
Division of Environmental Services
348 South Erie Street
Toledo, Ohio 43604

Dear Mr. McClure and Ms. Bannister:

On February 3, 2012, I inspected the Collins Park Water Treatment Plant (WTP) at 3040 York Street, Toledo (photos taken). You were present. The facility has activities that are currently covered by two different National Pollutant Discharge Elimination System (NPDES) permits for storm water discharges. NPDES permit No. 2PI00003 addresses discharges from the City of Toledo's Municipal Separate Storm Sewer System (MS4 permit). The City also has coverage under the NPDES general permit for storm water discharges associated with construction activities for three projects (Construction General Permit): the 2004 Filtration Plant Standby Power Facility, the 2009 CO₂ Tanks, and the 2010 Solar Field. Although not addressed by this letter, the facility also has an NPDES permit for discharges from the sludge lagoons.

Construction General Permit

The Filtration Plant Standby Power Facility (Facility No. 2GC00462) and the CO₂ Tanks (Facility No. 2GC02345) have been completed. The areas have been stabilized. These areas drain to an extended detention basin on the northeast side of the facility. We discussed the need to file a Notice of Termination (NOT) to relieve the City of the obligation to comply with this general permit. On February 15, 2012, I received an e-mail from James Donnell, Division of Water Treatment, Staff Professional Engineer, which stated that the City has submitted NOT forms for these projects.

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The Solar Field (Facility No. 2GC02668) has been completed. While the site had been seeded and grass was growing over a good portion of it, there remained a few areas where the grass cover had not yet reached a 70% density. Once you meet the termination eligibility criteria, please submit a completed NOT form to our Central Office in Columbus. The NOT form and instructions can be found on our website: <http://www.epa.ohio.gov/dsw/storm/stormform.aspx>.

MS4 permit

Under the MS4 permit, the City must implement a Storm Water Management Program (SWMP) to prevent or minimize the discharge of pollutants from its MS4. The SWMP must address illicit discharge detection and elimination. On October 26, 2011, Ohio EPA's Division of Surface Water was notified by the Division of Drinking and Ground Water about possible unpermitted discharges at the Collins Park WTP. The City had identified three leaks from pipes and other structures at the WTP, which eventually discharged into Otter Creek. At the time of my February 3, 2012 visit, two discharges had been eliminated. Only the discharge due to infiltration into the storm sewer between the Clearwell Reservoirs remained. I observed the 18-inch storm sewer outfall. The discharge appeared clear and not turbulent. The water elevation of Otter Creek was above the invert of the pipe. A gully from one of the overland discharges remained along the west bank of Otter Creek, between the storm sewer outfall and the bridge to the north.

The MS4 permit authorizes the discharges from potable water sources and uncontaminated groundwater provided that the discharges are not substantial contributors of pollutants to the MS4 and would not cause or contribute to in-stream exceedences of water quality standards (See Part I.A.2. and B.5.). The discharges were sampled by the City on October 24, 2011. Residual Chlorine for the storm sewer's discharge was reported to be 1.2 mg/l. A downstream sample of Otter Creek at the footbridge was reported as 0 mg/l. Ohio's Water Quality Standards (WQS) for Residual Chlorine are 0.019 mg/l (Outside Mixing Zone Maximum) and 0.011 mg/l (Outside Mixing Zone Average). The pH levels were not reported. The significant quantity of water discharged due to breaks and leaks at the treatment facility that also appear to exceed WQS should have been reported by the City to Ohio EPA's emergency spill number (see the MS4 permit, Part IV. B. Notification Requirements).

The City is in the process of determining more precisely the location of the Clearwell Reservoir leaks that are entering the storm sewer. It is my understanding that the leak investigation and repair will take at least a year, depending on the findings of the investigation. Since my visit, the City has installed a flow meter on the storm sewer's discharge to quantify its volume. Please keep me informed as to the flow volume recorded. Due to the long term nature of this discharge, the City needs to develop an ongoing monitoring and Best Management Practices (BMP) implementation plan to ensure the discharge is in compliance with WQS. Such a plan must include routine analysis of pH and residual chlorine, tracking the volumetric discharge rate,

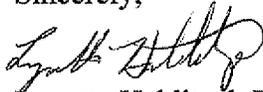
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and implementing BMPs to reduce residual chlorine concentrations. Please submit such a plan within seven days of the date on this letter. Please be sure to use analytical methods with an appropriate detection limit considering the level of the WQS. Depending on the outcome of the flow monitoring, we may require the City to modify the NPDES permit for the sludge lagoons to include this discharge.

The City's SWMP must also address pollution prevention for municipal operations. The permit requires the City to develop and implement an operations and maintenance program for its MS4 that includes a training component. According to you and Patekka, storm water program training has been provided to employees at the Collins Park WTP. Facility activities that may contribute pollutants to storm water runoff include material handling and grounds maintenance. There are no vehicle maintenance activities at the facility. A few compliance issues were observed around the outside of the facility. The gully to Otter Creek that formed due to the previous water leaks must be stabilized. This may require special measures such as erosion control matting. Most of the WTP drains into a storm water extended detention basin on the northeast side of the property. The pond's outlet has a gate valve. The pond's banks are steep and were sloughing in several spots. The banks must be stabilized. Within 30 days of the date on this letter, please submit to this office written notification as to the actions taken or proposed to address these compliance issues. Your response should include the dates, either actual or proposed, for the completion of the actions.

If there are any questions, please contact me at (419) 373-3009.

Sincerely,



Lynette Hablitzel, PE
Division of Surface Water

/jlm

pc: NWDO Files:
Collins Park WTP/Stormwater/2010/Construction
Collins Park WTP/Stormwater/2009/Construction
Toledo Collins Pk Filtra Plt Standby Pwr Fac/Stormwater/2004/Construction
City of Toledo/Stormwater/MS4
ec: Paul Brock, Ohio EPA, NWDO-DDAGW
Anthony Robinson, Ohio EPA, CO-DSW
Jason Fyffe, Ohio EPA, CO-DSW
Naajy Abdullah, Ohio EPA, NWDO-DSW
Inspection Tracking