

Louisville and Jefferson County Metropolitan Sewer District 700 West Liberty Street Louisville Kentucky 40203-1911 502-540-6000 www.msdlouky.org

August 17, 2012

Chief, Environmental Enforcement Section Environmental and Natural Resources Division U.S. Department of Justice Post Office Box 7611 Washington DC 20044-7611

Chief, Water Programs Enforcement Branch Water Management Program US EPA Region 4 Atlanta Federal Center 61 Forsyth Street SW Atlanta, GA 30303

Subject: Beargrass Creek Parallel Interceptor

Project Elimination

IOAP Project No. L_SO_MF_097_M_13_A_A_8

DOJ Case No. 90-5-1-1-08254

Attention Chiefs and Director:

MSD is providing advanced notification of a proposed minor project modification to eliminate the Beargrass Creek Parallel Interceptor project (IOAP Project No. L_SO_MF_097_M_13_A_A_8). This modification is part of an overall adaptive management review of the approved 2009 IOAP that will be documented in the proposed 2012 IOAP Modification to be formally submitted in 2013. No action is requested at this time.

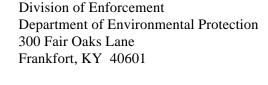
2009 IOAP Project Description

The Beargrass Creek Parallel Interceptor project included a 48-inch diameter gravity sewer and a 15-inch diameter force main installed along the South Fork of Beargrass Creek, with a scheduled completion date of December 31, 2017. The purpose of the pipe additions was to provide additional conveyance capacity for basin draining.

Proposed Project Modification

The project modification involves the elimination of this project, as other proposed project changes related to the Nightingale Pump Station and the proposed Calvary Creekside Storage Basin have made the new conveyance unnecessary.

These modifications are part of an overall adaptive management review of the approved 2009 IOAP. Additional sewer system monitoring, hydraulic modeling recalibration and enhancements to the physical



Jeff Cummins, Acting Director



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representation of the sewer system resulted in a redistribution of the flow in individual sewer lines, thus affecting project approach and sizing in some cases. Each proposed change will be justified in detail through minor modification letters. Detailed benefits, costs and program implementation refinements to the overflow abatement program will be documented in 2012 IOAP Modification to be submitted in 2013. No action is requested at this time.

Technical Justification

The original project includes 8,900 LF of 48-inch gravity interceptor from the Logan Street Storage Basin to the Starkey Pump Station, and 3,600 LF of 15-inch force main from the Calvary/Creekside Storage Basin to the Nightingale Pump Station. As part of the IOAP modifications, the Calvary Creekside Storage Basin is being eliminated by the construction of a reach of gravity sewer to convey sewer overflow to the proposed Logan Street Storage Basin. This new interceptor eliminates the need for the force main to the Nightingale Pump Station.

Several other project changes are proposed for the South Fork system, including resizing the Nightingale Pump Station from 60 million gallons per day (MGD) to 33 MGD with increased storage and changing the operating rules for the Starkey Pump Station from 140 MGD maximum flow to 108 MGD maximum flow. As a result of these changes and model recalibration based on expanded flow monitoring, MSD has determined that that the 48-inch interceptor is not needed either. The deletion of this project will not have any effect on wet weather capture or any other level of CSO control.

For your reference, a copy of the original project fact sheet and map from the IOAP in Attachment A are attached. No new projects have been provided as this project is proposed for elimination. Additional documentation on the costs and level of control analysis will be included in the 2012 IOAP Modification.

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 assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such 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.

If you have questions or need additional information, please contact Ms. Angela Akridge, Project WIN Program Manager, or myself at (502) 540-6000.

Sincerely,

W. Brian Bingham

Regulatory Services Director

cc: Greg Heitzman

Paula Purifoy

Attachments



ATTACHMENT A



CSO LTCP **Project Fact Sheet**



LTCP Project Number: L_SO_MF_097_M_13_A_A_8

Beargrass Creek South Fork Parallel Interceptors - Upper and Lower Reaches **Project Name:**

Project Type: Miscellaneous

Receiving Stream: Beargrass Creek

This project includes 8,900 L.F. of 48" gravity interceptor in the upper reach from Logan Street & Breckinridge **Project Description:**

Street Storage Basin to Starkey Pumping Plant & 3,600 L.F. of 15" force main from Calvary / Creekside Storage

Basin to Nightingale Pump Station

Design Parameters /

Assumptions:

Force main velocity set at 5 feet per second for 24 hour pump out of basin at CSO097.

Surrounding Area

Land Use:

South Fork Stream Corridor, Including Improved Channel

Apparent Utilities

Description:

No apparent conflict

Capital Projects: N/A

Advanced Site

Restoration:

N/A

Estimated Capital Cost

(2008):

\$12,994,000

Capital Cost / Gallon

Overflow Removed:

N/A

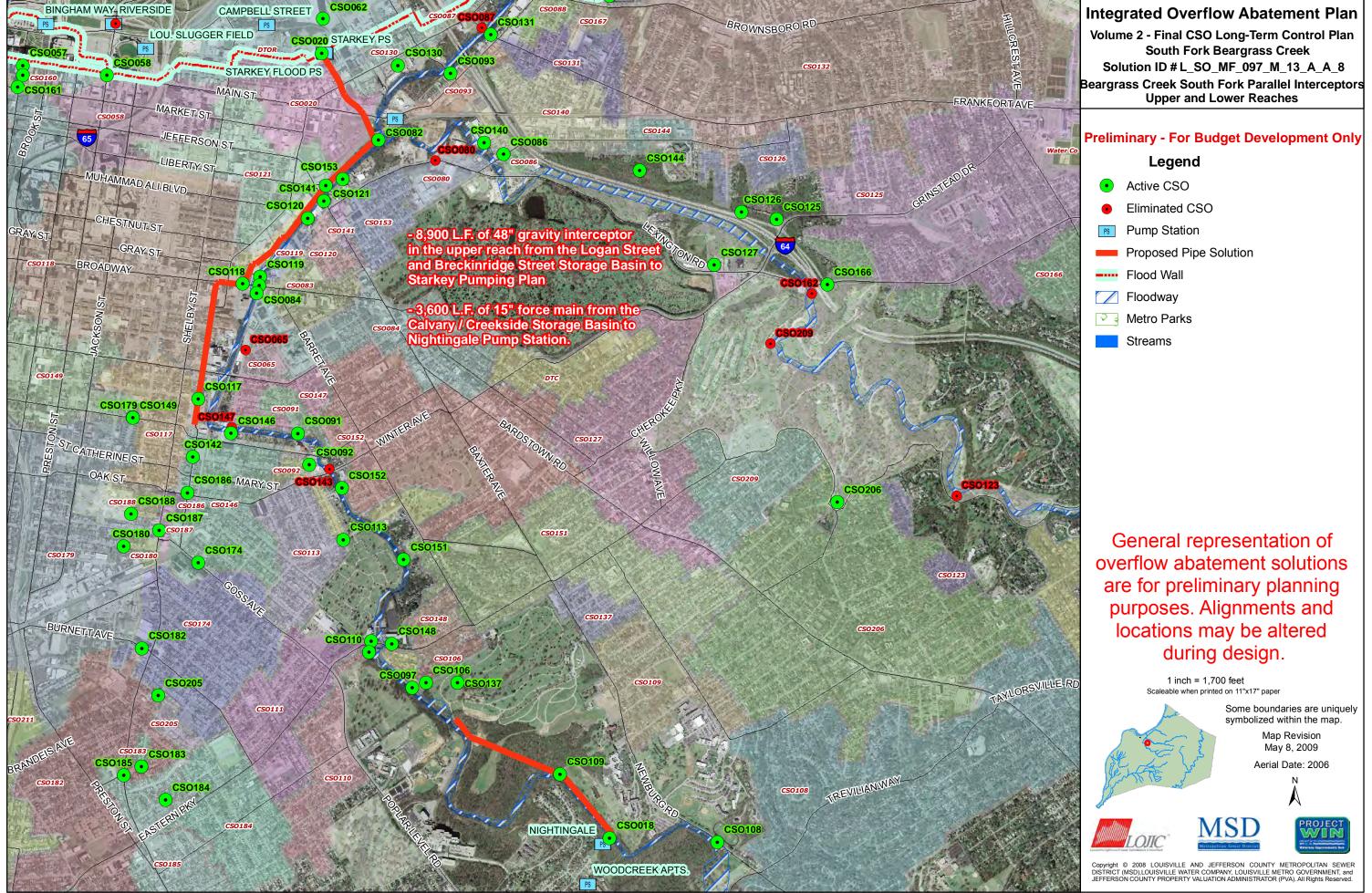
Weighted Benefit / Cost

Ratio (Capital Cost):

N/A

NOTE: CSO hydraulic statistics are predicted based on InfoWorks model results.

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ATTACHMENT B

Project Eliminated or Combined with Another

No Attachment B