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Jeff Cummins, Acting Director

Department of Environmental Protection

Division of Enforcement

300 Fair Oaks Lane

Frankfort, KY 40601

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: Calvary Creekside Storage Basin

Project Elimination

IOAP Project No. L_SO_MF_097_M_09B_B_D_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 Calvary Creekside Storage Basin project (IOAP Project No. L_SO_MF_097_M_09B_B_D_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.

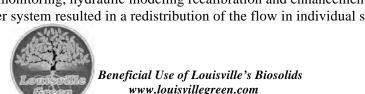
2009 IOAP Project Description

The Calvary Creekside Storage Basin involved the construction of a 3.46 million gallon (MG) storage basin to control six combined sewer overflows to be completed by December 31, 2017.

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 Logan Street and Breckenridge Street Basin have made the basin 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 representation of the sewer system resulted in a redistribution of the flow in individual sewer lines, thus



Calvary/Creekside Storage Basin August 17, 2012 Page 2 of 2

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 proposed 2012 IOAP Modification to be submitted in 2013. No action is requested at this time.

Technical Justification

Reviews of project approach and benefit/cost results indicate that the elimination of the Calvary/Creekside Storage Basin is justified. The consolidation of its storage volume in the Logan Street and Breckenridge Street Storage Basin (IOAP Project No. L_SO_MF_092_M_09B_B_D_8) has proven to be a more cost-effective option than the original design for two separate storage basin projects.

Details on the modification of the Logan Street and Breckenridge Street Storage Basin to compensate for the consolidation of flows from the Calvary/Creekside Storage Basin are available in the Logan Street and Breckenridge Street Storage Basin project modification letter. This consolidated project will maintain the same completion date of December 31, 2017, as each of the original solutions.

For your reference, copies of the original project fact sheet and map from the 2009 IOAP have been provided in Attachment A. A revised project fact sheet and map is attached to the Logan Street modification letter reflecting the new project size and conveyance alignment.

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

8

cc: Greg Heitzman

Paula Purifoy

Attachments



ATTACHMENT A



CSO LTCP Project Fact Sheet



<u>LTCP Project Number:</u> L_SO_MF_097_M_09B_B_D_8

Project Name: Calvary / Creekside Storage Basin

Project Type: Off-Line Storage

Receiving Stream: South Fork Beargrass Creek

Project Description: This project includes an 3.46 MG underground covered storage basin for CSO097, 106, 110, 111, 137, 148, and

151 to reduce overflows to 8 overflows per year. The facility will require an 3.46 MGD PS to return flow to the

interceptor.

<u>Design Parameters /</u>

Assumptions:

Basins are designed to the 9th overflow event volume, resulting in 8 CSO overflows/year. The 9th peak flowrate is evaluated to compare gravity vs. pumped conveyance. Design for pump-back is 24 hours. Type of basin based

on hydraulics and surroundings.

Surrounding Area

Land Use:

This project is located within 'Parks, Cemeteries, etc.'. The project is located between Calvary Cemetery and

Saint Xavier High School. It is located approx. 1000' Southeast of CSO097 & CSO106.

Apparent Utilities

Description:

No major utilities conflict within the area of the proposed basin

<u>Capital Projects:</u> 2013~Elimination of CSO106; 2007~Middle Fork Rehab Phase 2 & 2013~RTC @ CSO097, 110 & 151 - Awaiting

Start

Advanced Site

Restoration:

N/A

Estimated Capital Cost

(2008):

\$10,900,000

Capital Cost / Gallon

Overflow Removed:

\$0.07

Weighted Benefit / Cost

81.77

Ratio (Capital Cost):

Overflow Point	cso Name	CSO Area (Acres)	2008 AAOV (MG / Yr)	# of Overflows / Yr	Post LTCP AAOV (MG/Yr)	Post LTCP # Overflows / Year
CSO097	Cantonment Siphon Number 2	0.00	12.31	44	1.35	8
CSO106	Royal - Neff	11.80	0.33	17	0.17	8
CSO110	Regulator Number 3 - Goss Avenue	73.04	27.53	44	2.51	8
CSO137	Calvary Cemetery	26.65	3.97	37	0.51	8
CSO148	Eastern Parkway Diversion	24.89	1.26	26	0.37	8
CSO151	Regulator Number 5 - Castlewood	219.74	80.26	57	8.23	8

 ${\it NOTE: CSO\ hydraulic\ statistics\ are\ predicted\ based\ on\ InfoWorks\ model\ results}.$

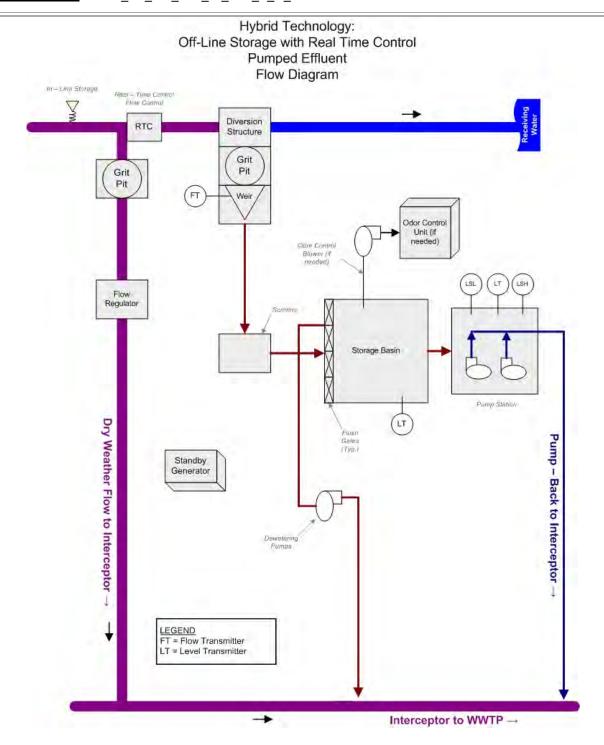
Report Print Date: 5/19/2009 SOURCE: O'Brien and Gere, 2008 Page 1 of 2

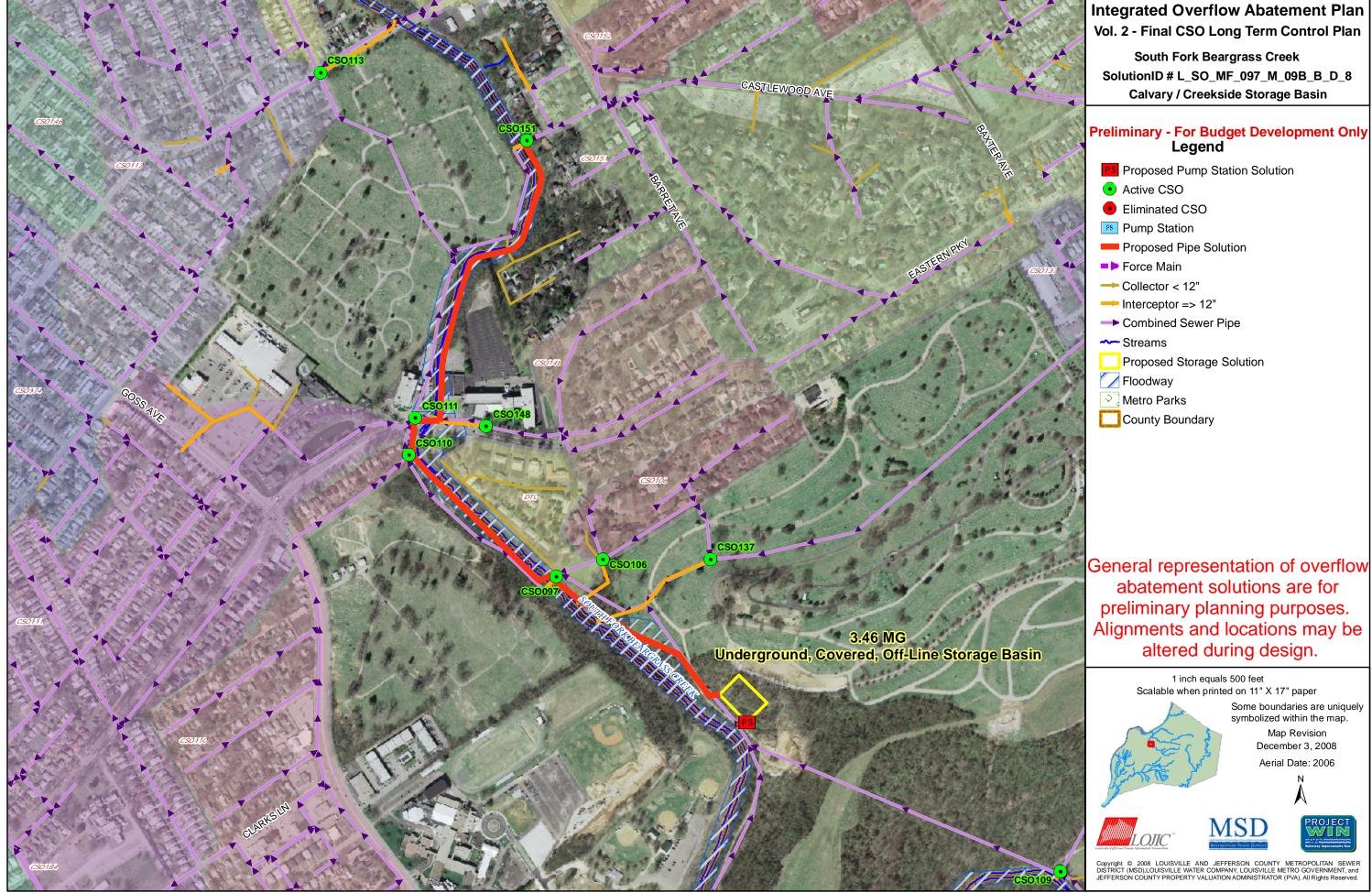


CSO LTCP Project Fact Sheet



L_SO_MF_097_M_09B_B_D_8







ATTACHMENT B

Project Eliminated or Combined with Another

No Attachment B