



*Louisville and Jefferson County Metropolitan Sewer District  
700 West Liberty Street  
Louisville Kentucky 40203-1911  
502-540-6000  
[www.msdlouky.org](http://www.msdlouky.org)*

August 17, 2012 (Revised September 20, 2012)

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

Jeff Cummins, Acting Director  
Division of Enforcement  
Department of Environmental Protection  
300 Fair Oaks Lane  
Frankfort, KY 40601

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

Subject: CSO 058 Separation Project  
Project Elimination  
IOAP Project No. L\_OR\_MF\_058\_S\_08\_A\_A\_0  
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 CSO 058 Separation Project (IOAP Project No. L\_OR\_MF\_058\_S\_08\_A\_A\_0). 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 original CSO 058 Separation Project included the separation of sanitary and storm sewers, with a scheduled completion date of December 31, 2014.

#### Proposed Project Modification

The project modification involves the elimination of this project, as other proposed project changes related to the proposed 13<sup>th</sup> and Rowan Street Basin has made the separation unnecessary. Based on benefit/cost analysis, the level of control will be changed from zero to eight CSO events in a typical year. Note however that the original sewer separation project would have allowed "first flush" urban stormwater runoff to reach the Waters of the US with virtually every rain event. It is likely that capturing first flush stormwater runoff and allowing combined sewage to overflow only eight times in a typical year represents an improvement in capture of contaminant loadings as compared to sewer separation.



*Beneficial Use of Louisville's Biosolids  
[www.louisvillegreen.com](http://www.louisvillegreen.com)*

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 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 CSO 058 Sewer Separation is justified. The consolidation of its storage volume in the 13<sup>th</sup> Street and Rowan Street Storage Basin (IOAP Project No. L\_OR\_MF\_155\_M\_09B\_B\_B\_4) has proven to be a more cost-effective option than the original design for two separate projects.

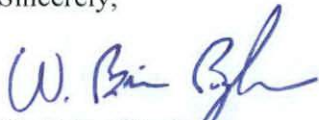
Details on the modification of the 13<sup>th</sup> Street and Rowan Street Storage Basin to compensate for the consolidation of flows from the CSO 058 Sewer Separation are available in the 13<sup>th</sup> Street and Rowan Street Storage Basin project modification letter. This consolidated project will include a modification of the completion date to December 31, 2020.

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 13<sup>th</sup> Street and Rowan Street Storage Basin 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

cc: Greg Heitzman                      Paula Purifoy

Attachments



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Details on the modification of the 13<sup>th</sup> Street and Rowan Street Storage Basin to compensate for the consolidation of flows from the CSO 058 Sewer Separation are available in the 13<sup>th</sup> Street and Rowan Street Storage Basin project modification letter. This consolidated project will include a modification of the completion date to December 31, ~~2017~~2020.

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 13<sup>th</sup> Street and Rowan Street Storage Basin modification letter reflecting the new project size and conveyance alignment.

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Sincerely,

W. Brian Bingham  
Regulatory Services Director

cc: Greg Heitzman                      Paula Purifoy

Attachments

# MSD

Metropolitan Sewer District

# ATTACHMENT A



# CSO LTCP Project Fact Sheet



**LTCP Project Number:** L\_OR\_MF\_058\_S\_08\_A\_A\_0

**Project Name:** CSO058 Sewer Separation

**Project Type:** Sewer Separation

**Receiving Stream:** Ohio River

**Project Description:** This project includes the construction of a new storm system consisting of 785 LF of 15" pipe in street and 1010 LF of 15" pipe out of street. It also includes 220 LF of 18" pipe in street.

**Design Parameters / Assumptions:** There are approx. 297 properties impacted by this project. The design flow would be developed in accordance with the MSD Design Manual.

**Surrounding Area Land Use:** This project includes properties with varying landuses including 'General Comm. & Office', 'Industrial', 'Public and Semi-Public', 'Multi-Family Residential' & 'Vacant and Undeveloped'.

**Apparent Utilities Description:** Sec. OH Elec. Ln. 18.7 ft. E, Ex. Gas Main 21 ft. NE, Water Main 6.42 ft. E; proposed piping passes over gas, electric, and water lines

**Capital Projects:** 2007~ORI Flow Installation Project - Under Construction~2012~Solids & Floatables CSO197 & CSO058 - Hidden

**Advanced Site Restoration:** N/A

**Estimated Capital Cost (2008):** \$1,361,100

**Capital Cost / Gallon Overflow Removed:** \$0.02

**Weighted Benefit / Cost Ratio (Capital Cost):** 68.85

**Overflow Points Addressed:**

CSO Number	CSO Name	CSO Area (Acres)	2008 AAOV (MG / Yr)	# of Overflows / Yr	Post LTCP AAOV (MG/Yr)	Post LTCP # Overflows / Year
CSO058	Preston Street Overflow Weir	105.41	116.64	50	0	0

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



# Integrated Overflow Abatement Plan

## Volume 2 - Final CSO Long-Term Control Plan

Ohio River  
Solution ID # L\_OR\_MF\_058\_S\_08\_A\_A  
CSO058 Sewer Separation

Preliminary - For Budget Development Only

### Legend

- Active CSO
- Eliminated CSO
- Proposed Storm Catch Basin
- Proposed Storm Manhole
- Existing Catch Basin
- PS Pump Station
- Proposed Storm Pipe Solution
- Force Main
- Existing Drainage Line
- Collector < 12"
- Interceptor => 12"
- Combined Sewer Pipe
- Flood Wall
- Floodway
- Metro Parks
- Streams

General representation of overflow abatement solutions are for preliminary planning purposes. Alignments and locations may be altered during design.

1 inch = 200 feet  
Scaleable when printed on 11"x17" paper

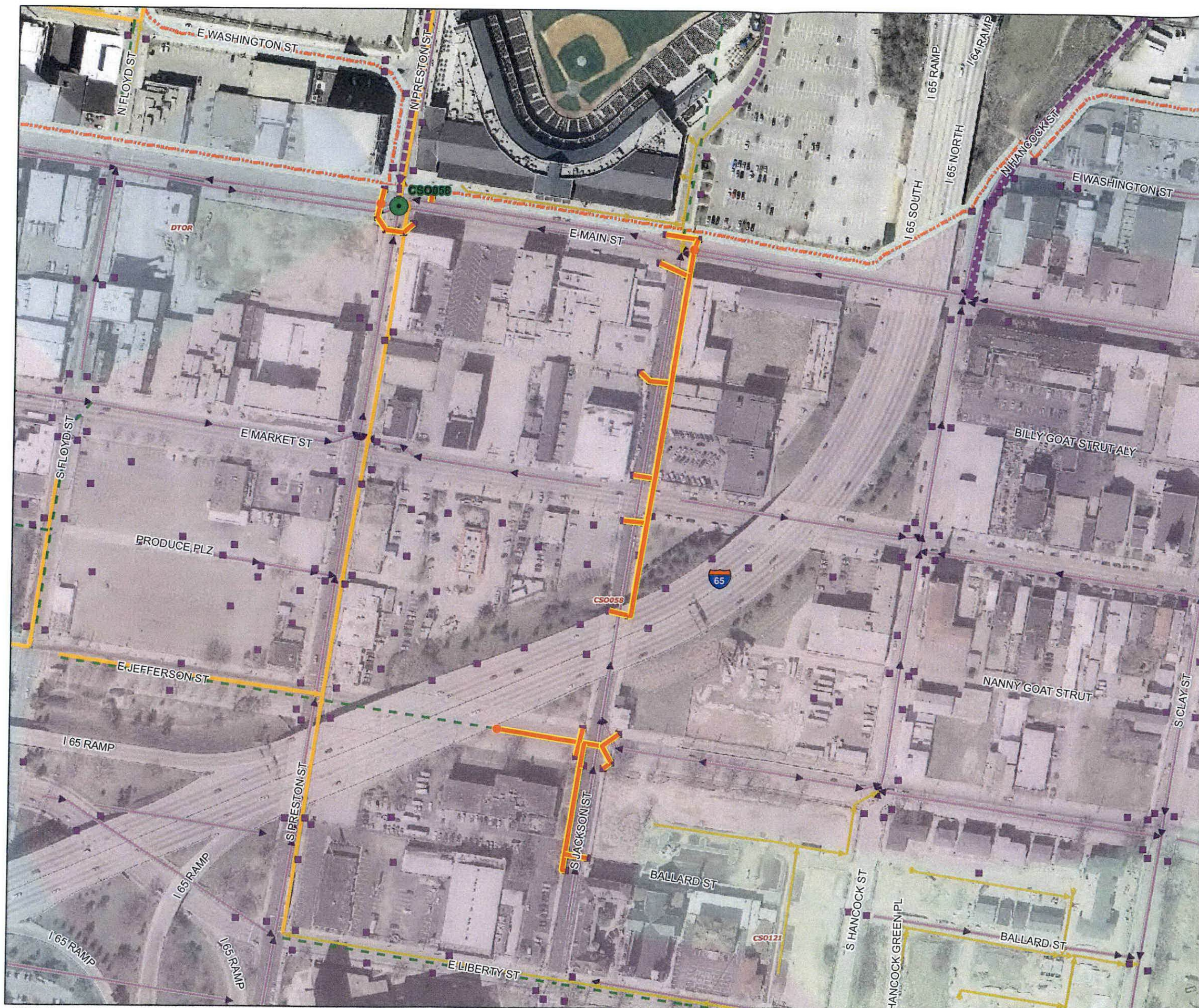


Some boundaries are uniquely symbolized within the map.

Map Revision  
Mar 13, 2009  
Aerial Date: 2006



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# MSD

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# ATTACHMENT B



**Project Eliminated  
Or Combined with Another**

**No Attachment B**