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

February 16, 2015

Dennis J. Sayre
NPDES Permitting and Enforcement Branch
U.S. EPA Region 4
61 Forsyth St., SW
Atlanta, Georgia 30303

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

Subject: St. Rene Road Pump Station In-Line Storage
Minor Project Modification
IOAP Project No. S_FF_CH_NB01_S_09A_C_A
DOJ Case No. 90-5-1-1-08254

Attention Dennis and Jeff:

MSD is requesting approval of a proposed minor project modification to the St. Rene Road Pump Station In-Line Storage project (IOAP Project No. S_FF_CH_NB01_S_09A_C_A). This modification is part of an overall adaptive management review of the approved 2012 IOAP Modification, and in response to an opportunity that presented itself as a result of conditions not foreseen during development of the IOAP.

2009 IOAP Project Description

The St. Rene Road Pump Station In-Line Storage project originally involved replacing 42 LF of 8-inch diameter gravity sewer with 48-inch diameter pipe to provide in-line storage. This in-line storage was intended to attenuate flow peaks that exceeded the capacity of the St Rene Road Pump Station, thereby eliminating the SSO at the pump station. This project has an IOAP completion date of December 31, 2021.

Project Modification Request

The project modification proposed eliminates the St. Rene Road Pump Station by constructing approximately 700 LF of 15-inch diameter gravity sewer to the Upper Billtown Interceptor, which was constructed as part of the Jeffersontown Water Quality Treatment Center (WQTC) final elimination plan.

Technical Justification

The original IOAP considered a variety of storage and pump station upgrades to eliminate the SSO at the St. Rene Road Pump Station location. The selected solution in the 2009 IOAP was to provide in-line storage, based on the benefit-cost evaluation approach used in the IOAP.

The final Jeffersontown WQTC elimination plan was submitted for regulatory review in March, 2010. It calls for diverting approximately one-third of the Jeffersontown WQTC flow south to the Cedar Creek WQTC, with the remainder of the flow diverted north to the Hikes Lane interceptor. Part of the infrastructure required for the diversion to the Cedar Creek WQTC was the construction of the Upper Billtown Road Interceptor. Final alignment of this interceptor passes within 700 feet of the St. Rene Road Pump Station. Based on this alignment, the pump station could be eliminated with a lower life-cycle cost than the cost to construct the in-line storage and continue to operate the pump station indefinitely. A project was initiated to eliminate the pump station to avoid the cost of continued pump station operation. An additional benefit of the pump station elimination is the elimination of the SSO associated with the pump station.

The pump station was eliminated in September, 2014, thereby eliminating the SSO at this location more than seven years earlier than originally proposed.

For your reference, a copy of the current project fact sheet and map from the 2012 IOAP Modification are in Attachment A. A new project fact sheet and map reflecting the pump station elimination have been provided in Attachment B.

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 me at (502) 540-6000.

Sincerely,

Angela L. Akridge, PE
Infrastructure Planning and Environmental Compliance Director

cc: Greg Heitzman Paula Purifoy

x:\..Final St Rene PS elimination February 2015 Modification.docx

Attachments

Attachment A

SSO Project Fact Sheet
2012 IOAP Project Modification

Project Name	St. Rene Rd. PS Inline Storage
Project Number	S_FF_CH_NB01_S_09A_C_A
Modeled Area	Chenoweth Hills
Branch or SSO ID	CH01
Project Type	Inline Storage
Receiving Stream	Chenoweth Run
Project Description	This alternative includes replacing 42 LF of 8" with 48" pipe just upstream of the PS.
Reason for Overflow	Pump station capacity
Design Parameters	This solution is based on a 1.82 inch cloudburst rain event.
Project Constraints	N/A
Estimated Capital Cost	$30,000
Weighted Benefit/Cost Ratio	212.00

Asset ID	SSO Start Date	Volume (Gal)
94187	3/19/2008	4380

Integrated Overflow Abatement Plan

Vol. 3 - Sanitary Sewer Discharge Plan

Chenoweth Hills Sewershed

St. Rene Rd. PS Inline Storage

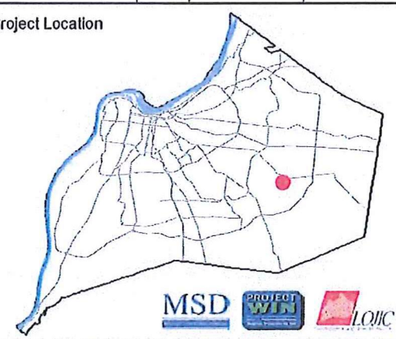
Preliminary - For Budget Development Only

- Documented SSO
- Suspected SSO
- Haulop Locations
- Pump Stations
- WQTC
- Proposed Pipe Solution
- Combined Sewer Pipe
- Force Main
- Collector < 12"
- Interceptor >= 12"
- TP Effluent Lines
- Streams
- Floodway
- Jefferson County Boundary

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

1 inch = 100 feet	N	Aerial Date: 2009	Map Revision: April 9, 2012

Project Location



J:\msd\SharedMaps\IOAP\2012 Revision\MXD\2009Updates\St Rene Rd PS Inline Storage.mxd

This document was developed in color. Reproduction in black and white may not represent the data as intended. Scalable when printed on 11"x17" paper.

Attachment B

SSO Project Fact Sheet
2012 IOAP Project Modification

Project Name	St. Rene Rd. PS Elimination
Project Number	S_FF_CH_NB01_S_09A_C_A
Modeled Area	Chenoweth Hills
Branch or SSO ID	CH01
Project Type	Elimination
Receiving Stream	Chenoweth Run
Project Description	This alternative includes elimination of the pump station with a new 15" diameter sewer. Flow will be diverted to the Cedar Creek WQTC..
Reason for Overflow	Pump station capacity
Design Parameters	This solution is based on a 1.82 inch cloudburst rain event.
Project Constraints	N/A
Estimated Capital Cost	$30,000
Weighted Benefit/Cost Ratio	212.00

Asset ID	SSO Start Date	Volume (Gal)
94187	3/19/2008	4380

Integrated Overflow Abatement Plan

Vol. 3 - Sanitary Sewer Discharge Plan

Chenoweth Hills Sewershed

St. Rene Rd. PS Elimination

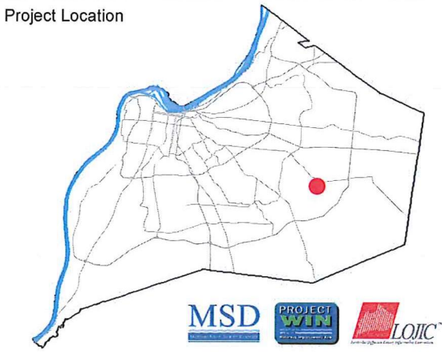
Preliminary - For Budget Development Only

- Documented SSO
- Suspected SSO
- Haulop Locations
- Pump Stations
- WQTC
- Proposed Pipe Solution
- Combined Sewer Pipe
- Force Main
- Collector < 12"
- Interceptor >= 12"
- TP Effluent Lines
- Streams
- Floodway
- Jefferson County Boundary

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

1 inch = 100 feet	N	Aerial Date: 2009	Map Revision: Nov 12, 2014

Project Location



J:\msd\SharedMaps\IOAP\2012 Revision\MXD\2009Updates\St Rene Rd PS Elimination.mxd

This document was developed in color. Reproduction in black and white may not represent the data as intended. Scalable when printed on 11"x17" paper.