



700 West Liberty Street | Louisville, KY 40203-1911
Phone: 502.540.6000 | LouisvilleMSD.org

January 9, 2026

Director, Division of Enforcement
Department for Environmental Protection
300 Sower Blvd.
Frankfort, KY 40601

Chief, Water Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street SW
Atlanta, GA 30303

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

Subject: Camp Taylor Sewer System Improvements, Phase 4
Project Modification to Camp Taylor Sewer System Improvements, Phase 4 – Offline Storage
IOAP Project No. S_SF_MF_30917_M_09_A
DOJ Case No. 3:05-cv-00236-CRS

Attention Chiefs and Director:

MSD is requesting approval of a proposed minor project modification to the Camp Taylor Sewer System Improvements Phase 4 project (IOAP Project No. S_SF_MF_30917_M_09_A). This request is part of ongoing adaptive management review of the approved Integrated Overflow Abatement Plan (IOAP) dated April 2021.

2009 IOAP Project Description

The original Camp Taylor Sewer System Improvements Phase 4 project consisted of a 0.038 MG offline sewer storage basin. Phases 1-3 of the project consisted of significant sewer investigation, rehabilitation and replacement. Phase 4 was included as a contingency if Phases 1-3 were not successful to reduce overflows below the level of control. The committed level of control for the project was for a 10-year, 3-hour cloudburst event. The project completion date was December 31, 2014.

2012 IOAP Modification Project Description

As part of the 2012 IOAP Modification (approved in 2014), Phases 2 and 3 of the project were combined into one phase, and the overall project area was expanded. The project completion date for Phase 4 was changed to December 31, 2024. The committed level of control for the project remained the same.

2021 IOAP Modification Project Description

No changes were made to the project scope as part of the 2021 IOAP modification. The project completion date was set at December 31, 2035, to allow adequate time for monitoring the impacts of the improvements completed as part of Phases 1-3.

2026 Project Modification Request

The project modification request eliminates Phase 4 of the project.

Technical Justification

As previously noted, Phase 4 of the project was included as part of the IOAP as a contingent project based on the results of Phases 1-3. Initial modeling and projections indicated the sewer system rehabilitation would reduce overflows to the committed level of control. However, flow reduction from sewer rehabilitation does not always occur as anticipated, and Phase 4 of the project was left in the IOAP as a contingency.

Camp Taylor Sewer System Improvements, Phase 4 – Project Modification Request

January 9, 2026

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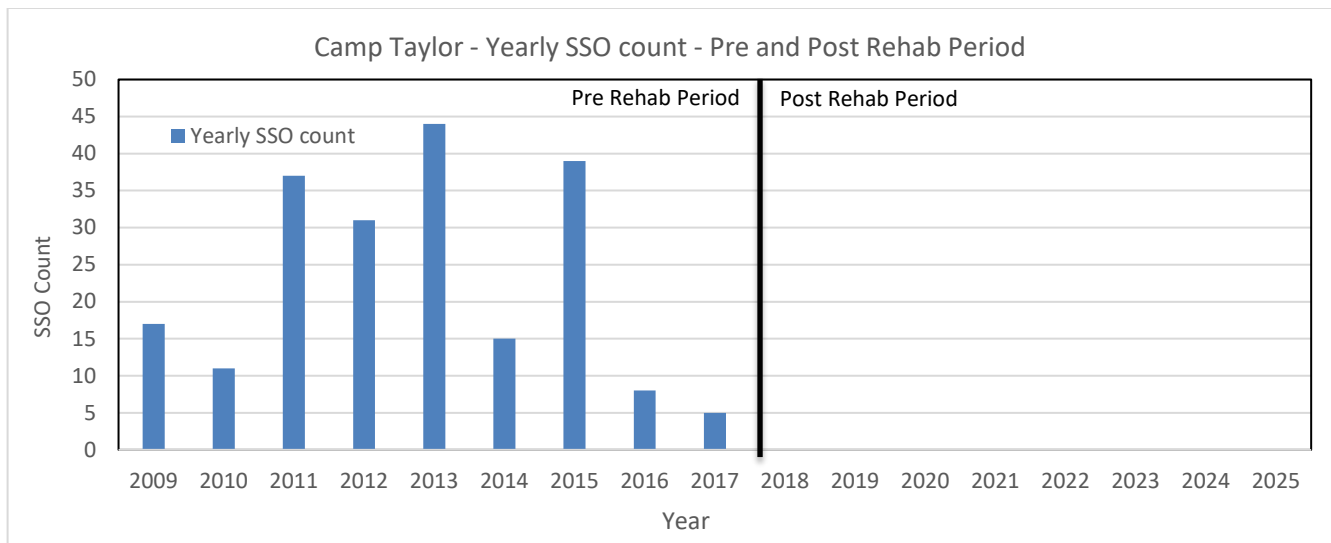
Phase 1 of the project included a Sanitary Sewer Evaluation Study (SSES) and was completed in 2011. Phases 2 and 3 were based on the results of the SSES and included rehabilitation and replacement of many sections of sewer. During the project, MSD discovered and repaired significant defects in the system and removed illicit connections. If defects were unable to be repaired, MSD replaced the portion of the sewer system. In total, approximately 46,000 linear feet of new sewer was installed, 7,000 linear feet was replaced, and 29,000 linear feet was rehabilitated. These phases were completed in 2017. Success required a customer-centered approach, involving nearly 2440 individual properties.

Flow meters were installed and the SSO locations were monitored regularly during wet weather after the completion of the project. The hydraulic models were updated to include the new infrastructure and were re-calibrated using the new flow monitoring data. The updated models indicate no overflows for a 10-year cloudburst event. Furthermore, there have been no observed overflows since the completion of the project in 2017. Table 1 below shows the modeled pre and post-overflow volumes. Chart 1 below shows the total number of observed occurrences before and after the rehabilitation project was completed.

Table 1: Summary of Pre-Rehab and Post-Rehab Overflow Volumes

| 10-Year CB Overflow Volume | | | |
|----------------------------|--------------------------------|---------------------------------|---|
| Historical SSO | Pre-Rehab Overflow Volume (MG) | Post-Rehab Overflow Volume (MG) | Post-Rehab Overflow Volume (MG) |
| MH #08717 | 0.16 | 0 | Manhole Eliminated as part of Rehab |
| MH #104223 | 0.00 | 0 | Manhole Eliminated as part of Rehab |
| MH #104231 | 0.40 | 0 | No Overflows, more than 6-foot available for surcharge |
| MH #13931 | 0.00 | 0 | Manhole Eliminated as part of Rehab |
| MH #13943 | 0.15 | 0 | No Overflows, more than 10-foot available for surcharge |
| MH #36763 | 0.20 | 0 | Manhole Eliminated as part of Rehab |
| MH #44396 | 0.01 | 0 | Manhole Eliminated as part of Rehab |
| MH #66349 | 0.10 | 0 | Manhole Eliminated as part of Rehab |
| Total Volume | 1.02 | 0 | No Overflows post rehab |

Chart 1: Summary of Pre-Rehab and Post-Rehab Total Overflow Occurrences




Camp Taylor Sewer System Improvements, Phase 4 – Project Modification Request
January 9, 2026
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For your reference, a copy of the original project fact sheet from the 2021 IOAP Modification, updated to show this project as “eliminated”, can be found in Attachment “A”.

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 Brian Bingham (brian.bingham@louisvillemud.org) at 502.540.6145 or David Johnson (david.johnson@louisvillemud.org) at 502.540.6392.

Sincerely,

DocuSigned by:

80A92B56878C4DD...
Brian Bingham
Chief Operations Officer

DocuSigned by:

387230FBE8A44FA...
David Johnson, PE
Chief Engineer

cc: T. Parrot J. Quarles

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Attachment A: 2021 IOAP Modification Fact Sheet (Updated)

Attachment A





SSO Project Fact Sheet

2021 IOAP Modification



Project Name ~~Camp Taylor System Improvements Phase 4 – Storage Basin and Sewer Upsize~~

Project Number S_SF_MF_30917_M_09_A

Modeled Area CSO

Branch or SSO ID 30917

Project Type Sewer Replacement and Storage Basin

Receiving Stream South Fork Beargrass Creek, Muddy Fork Beargrass Creek, and Camp Taylor Ditch

Project Description This alternative includes additional rehab of sewers based on SSES findings and constructing a lift-line pumped 0.038 MG storage basin at the PS to store excess wet weather flows, 3,000 LF of 8" sewer to convey flow to basin. Flow monitoring and system monitoring will be performed in the Camp Taylor system after rehab is complete. If the system is operating without overflows at a 2.6-inch storm, no storage basin will be constructed. Documentation of this analysis will be submitted to the appropriate regulatory agencies.

Reason for Overflow System capacity and poor system conditions in some areas

Design Parameters This solution is based on a 2.60 inch cloudburst rain event. Estimated capital costs include all four phases.

Project Constraints Some overflow volumes were estimated using regression equation not by a hydraulic model.

Estimated Capital Cost \$28,279,000

Weighted Benefit/Cost Ratio Unavailable at this time

| Asset ID | SSO Start Date | Volume (Gal) |
|----------|----------------|--------------|
| | No Data | No Data |
| 104223 | 5/20/2005 | 40 |
| 104223 | 1/23/2012 | 5100 |
| 104223 | 5/2/2010 | 36000 |
| 104231 | 6/15/2011 | 100 |
| 104231 | 5/8/2009 | 27000 |
| 104231 | 10/9/2009 | 108000 |
| 104231 | 3/9/2011 | 264000 |
| 104231 | 4/11/2011 | 385500 |
| 104231 | 10/19/2009 | 3000 |
| 104231 | 5/1/2010 | 152000 |
| 104231 | 12/20/2009 | 96000 |
| 104231 | 5/26/2011 | 5500 |
| 104231 | 1/17/2007 | 600 |
| 104231 | 8/7/2011 | 18000 |
| 104231 | 7/20/2011 | 4500 |
| 104231 | 4/1/2012 | 54000 |
| 104231 | 5/23/2011 | 36000 |
| 104231 | 2/28/2011 | 10900 |
| 104231 | 9/20/2009 | 52500 |
| 104231 | 7/29/2009 | 75000 |
| 104231 | 5/1/2010 | 573120 |
| 104231 | 5/12/2010 | 1300 |
| 104231 | 5/21/2010 | 105000 |
| 104231 | 7/13/2010 | 500 |



SSO Project Fact Sheet
2021 IOAP Modification



Project Name **Camp Taylor System Improvements Phase 4 - Storage Basin and Sewer Upsize**

Project Number **S_SF_MF_30917_M_09_A**

| | | |
|--------|------------|--------|
| 104231 | 11/25/2010 | 1200 |
| 104231 | 11/30/2010 | 9000 |
| 104231 | 2/24/2011 | 11950 |
| 104231 | 1/26/2012 | 12600 |
| 104231 | 4/23/2011 | 845000 |
| 104231 | 9/26/2011 | 4800 |
| 104231 | 8/4/2009 | 351360 |
| 104231 | 9/1/2012 | 100 |
| 104231 | 11/28/2011 | 39000 |
| 104231 | 11/22/2011 | 27000 |
| 104231 | 7/14/2012 | 6300 |
| 104231 | 5/31/2012 | 11500 |
| 104231 | 5/29/2012 | 140000 |
| 104231 | 5/5/2012 | 250 |
| 104231 | 12/8/2012 | 900 |
| 104231 | 12/9/2012 | 2000 |
| 104231 | 5/13/2012 | 7200 |
| 104231 | 10/1/2012 | 1880 |
| 104231 | 3/17/2012 | 16000 |
| 104231 | 1/13/2013 | 3500 |
| 104231 | 9/5/2012 | 100 |
| 104231 | 7/27/2012 | 50 |
| 104231 | 3/23/2012 | 1000 |
| 104231 | 7/19/2012 | 3000 |
| 104231 | 3/18/2013 | 108000 |
| 104231 | 12/22/2013 | 15000 |
| 104231 | 10/5/2013 | 180000 |
| 104231 | 7/1/2013 | 40500 |
| 104231 | 1/26/2013 | 6000 |
| 104231 | 5/1/2013 | 10800 |
| 104231 | 5/5/2013 | 7200 |
| 104231 | 4/19/2013 | 150 |
| 104231 | 8/21/2013 | 100 |
| 104231 | 12/5/2011 | 399000 |
| 104231 | 3/4/2008 | 6000 |
| 13931 | 10/5/2013 | 32000 |
| 13931 | 7/22/2013 | 100 |
| 13931 | 5/29/2012 | 1200 |
| 13931 | 12/22/2013 | 9000 |
| 13931 | 8/4/2009 | 77760 |
| 13931 | 6/23/2011 | 100 |
| 13943 | 3/5/2011 | 100 |
| 13943 | 5/10/2013 | 900 |

PROJECT ELIMINATED



SSO Project Fact Sheet
2021 IOAP Modification



Project Name **Camp Taylor System Improvements Phase 4 - Storage Basin and Sewer Upsize**

Project Number **S_SF_MF_30917_M_09_A**

| | | |
|-------|------------|--------|
| 13943 | 5/1/2011 | 32000 |
| 13943 | 4/23/2011 | 17000 |
| 13943 | 4/11/2011 | 345500 |
| 13943 | 1/27/2012 | 21000 |
| 13943 | 6/26/2013 | 1500 |
| 13943 | 8/4/2009 | 4320 |
| 13943 | 1/13/2013 | 37500 |
| 13943 | 12/22/2013 | 3000 |
| 13943 | 3/17/2012 | 1800 |
| 13943 | 4/1/2012 | 720 |
| 13943 | 5/13/2012 | 1800 |
| 13943 | 5/29/2012 | 27500 |
| 13943 | 5/31/2012 | 3500 |
| 13943 | 7/14/2012 | 360 |
| 13943 | 9/26/2011 | 1100 |
| 13943 | 12/9/2012 | 900 |
| 13943 | 8/7/2011 | 1500 |
| 13943 | 7/22/2013 | 1000 |
| 13943 | 11/28/2011 | 31000 |
| 13943 | 12/5/2011 | 1000 |
| 13943 | 5/23/2011 | 1200 |
| 13943 | 8/12/2013 | 100 |
| 13943 | 10/5/2013 | 1500 |
| 13943 | 11/17/2013 | 1500 |
| 13943 | 12/8/2012 | 180 |
| 13943 | 3/9/2011 | 327500 |
| 13943 | 4/4/2008 | 250 |
| 13943 | 3/1/2006 | 250 |
| 13943 | 1/8/2009 | 360 |
| 13943 | 9/1/2009 | 3000 |
| 13943 | 10/9/2009 | 554 |
| 13943 | 5/21/2010 | 4500 |
| 13943 | 11/25/2010 | 780 |
| 13943 | 3/18/2013 | 1320 |
| 13943 | 2/24/2011 | 6000 |
| 13943 | 7/20/2011 | 420 |
| 13943 | 6/22/2011 | 4500 |
| 13946 | 10/6/2013 | 24000 |
| 13946 | 10/30/2013 | 6000 |
| 13946 | 5/6/2011 | 100 |
| 13946 | 11/17/2013 | 72000 |
| 13946 | 12/22/2013 | 49500 |
| 36763 | 4/23/2011 | 194000 |

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SSO Project Fact Sheet
2021 IOAP Modification



Project Name **Camp Taylor System Improvements Phase 4 - Storage Basin and Sewer Upsize**

Project Number **S_SF_MF_30917_M_09_A**

| | | |
|-------|------------|--------|
| 36763 | 8/21/2013 | 100 |
| 36763 | 8/4/2009 | 77760 |
| 36763 | 1/13/2013 | 40500 |
| 36763 | 3/18/2013 | 1440 |
| 36763 | 6/26/2013 | 4500 |
| 36763 | 8/12/2013 | 100 |
| 36763 | 10/5/2013 | 4200 |
| 36763 | 10/30/2013 | 1500 |
| 36763 | 11/17/2013 | 33600 |
| 36763 | 12/22/2013 | 39000 |
| 36763 | 7/22/2013 | 3000 |
| 36763 | 7/29/2009 | 1800 |
| 44396 | 3/9/2011 | 31250 |
| 44396 | 4/1/2012 | 3600 |
| 44396 | 5/3/2011 | 16200 |
| 44396 | 5/29/2012 | 5000 |
| 44396 | 4/11/2011 | 36525 |
| 44396 | 4/23/2011 | 5500 |
| 44396 | 7/20/2011 | 1700 |
| 44396 | 5/2/2010 | 7760 |
| 44396 | 8/4/2009 | 144000 |
| 44396 | 7/29/2009 | 15000 |
| 44396 | 9/26/2011 | 5550 |
| 44396 | 4/4/2008 | 79500 |
| 44397 | 10/23/2007 | 8640 |
| 44397 | 2/13/2007 | 1980 |
| 44397 | 3/19/2008 | 27540 |
| 44397 | 3/1/2007 | 2160 |
| 44397 | 1/14/2007 | 9000 |
| 44397 | 5/1/2004 | 208000 |
| 44397 | 7/14/2006 | 9720 |
| 44397 | 1/3/2005 | 266800 |
| 44397 | 5/19/2005 | 210000 |
| 44397 | 8/30/2005 | 9200 |
| 44397 | 3/12/2006 | 52900 |
| 44397 | 1/23/2006 | 2300 |
| 44397 | 9/22/2006 | 9900 |
| 44397 | 4/3/2007 | 5940 |
| 44397 | 3/27/2008 | 16740 |
| 44397 | 4/4/2008 | 79500 |
| 44397 | 12/15/2007 | 7020 |
| 44397 | 5/27/2004 | 14000 |
| 44397 | 4/21/2006 | 36800 |

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SSO Project Fact Sheet
2021 IOAP Modification



Project Name **Camp Taylor System Improvements Phase 4 - Storage Basin and Sewer Upsize**

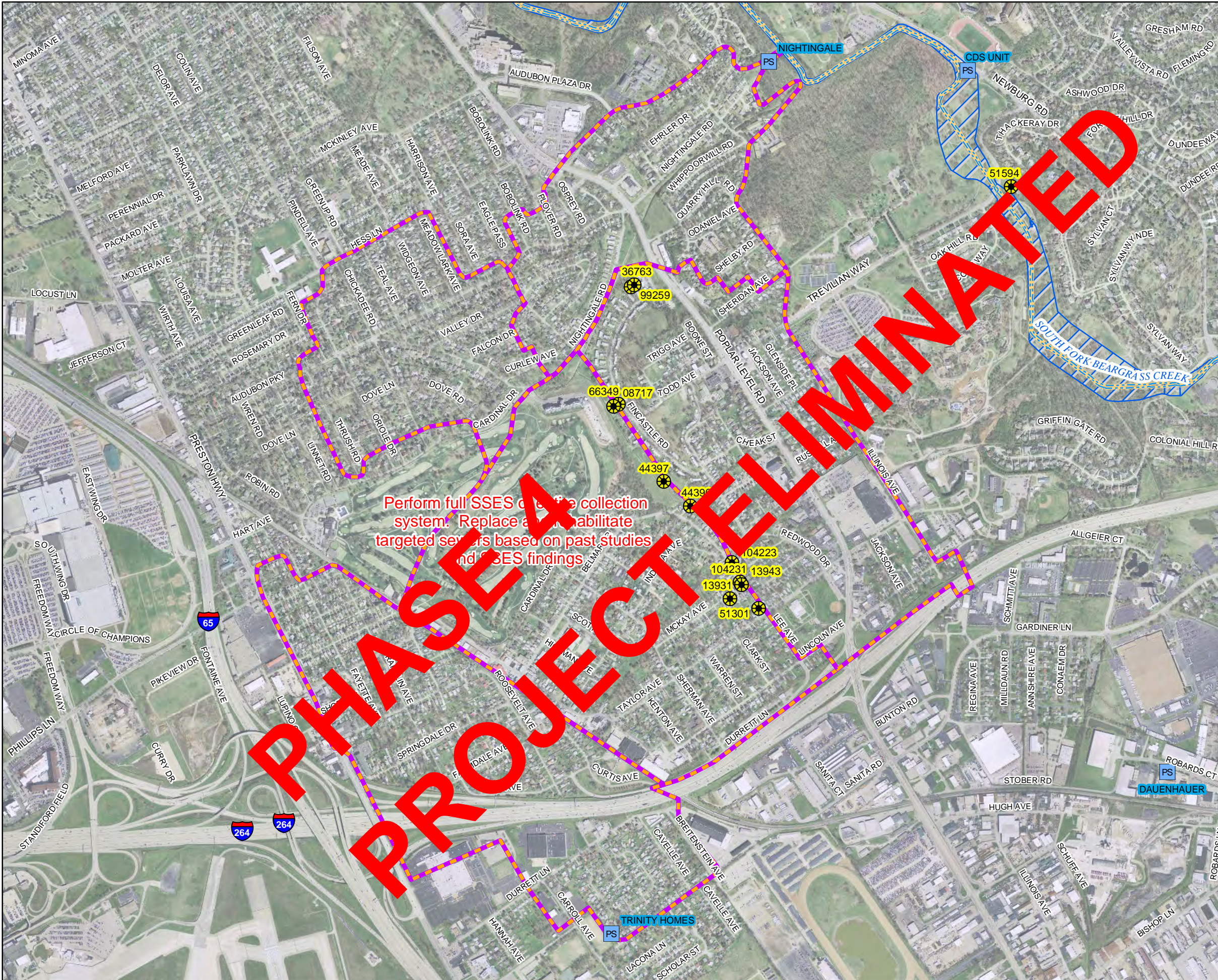
Project Number **S_SF_MF_30917_M_09_A**

| | | |
|-------|------------|--------|
| 44397 | 7/19/2007 | 1620 |
| 44397 | 10/18/2004 | 10000 |
| 44397 | 3/4/2008 | 10800 |
| 44397 | 1/17/2006 | 6800 |
| 44397 | 6/2/2006 | 50600 |
| 44397 | 4/14/2007 | 6210 |
| 44397 | 5/15/2008 | 12750 |
| 51301 | 10/9/2009 | 540 |
| 51301 | 9/20/2009 | 21000 |
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| 51301 | 5/2/2010 | 144000 |
| 66349 | 5/10/2013 | 1800 |
| 66349 | 10/30/2013 | 1500 |
| 66349 | 10/5/2013 | 720 |
| 66349 | 7/22/2013 | 720 |
| 66349 | 3/18/2013 | 720 |
| 66349 | 12/9/2012 | 2400 |
| 66349 | 6/22/2011 | 1500 |
| 66349 | 4/27/2011 | 36000 |
| 66349 | 1/13/2013 | 57500 |
| 66349 | 11/17/2013 | 75000 |
| 66349 | 8/4/2009 | 77760 |
| 99259 | 5/2/2010 | 4320 |
| 99259 | 7/22/2013 | 1000 |
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| 99259 | 12/2/2013 | 5700 |
| 99259 | 7/22/2013 | 1800 |
| 99259 | 10/30/2013 | 6000 |
| 99259 | 4/27/2011 | 36000 |
| 99259 | 4/12/2011 | 100 |
| 99259 | 1/13/2013 | 28000 |
| 99259 | 3/18/2013 | 720 |
| 99259 | 8/9/2013 | 100 |
| 99259 | 10/5/2013 | 1500 |
| 99259 | 11/17/2013 | 4800 |

PROJECT ELIMINATED

**Integrated Overflow Abatement Plan
Vol. 3 - Sanitary Sewer Discharge Plan
Combined Sewer System
Camp Taylor System Improvements**

Preliminary - For Budget Development Only

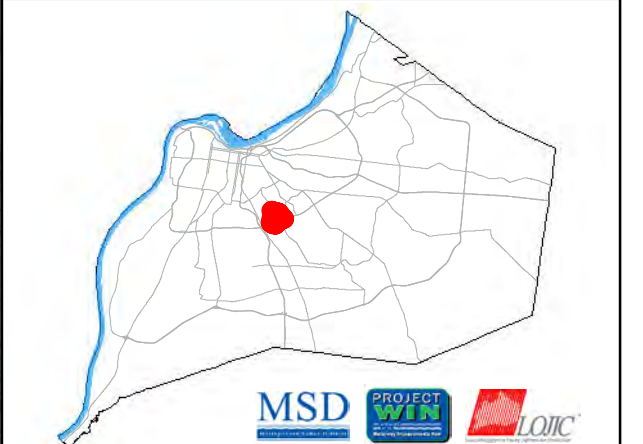


Perform full SSES on the collection system. Replace and rehabilitate targeted sewers based on past studies and SSES findings

- Documented SSO
- Suspected SSO
- Haulop Locations
- Proposed Pump Station Solution
- Pump Stations
- MSD
- Streams
- Floodway
- SSES Area
- Jefferson County Boundary

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

1 inch = 1,123 feet Aerial Date: 2009 Map Revision: April 9, 2012



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Louisville, KY 40203

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John Loechle

john.loechle@louisvillemsd.org

Technical Services Director

Louisville & Jefferson County Metropolitan Sewer District

Security Level: Email, Account Authentication (Optional)

Signature

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David Johnson

david.johnson@louisvillemsd.org

Chief Engineer

Louisville & Jefferson County Metropolitan Sewer District

Security Level: Email, Account Authentication (Optional), Logged in

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Electronic Record and Signature Disclosure:

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Brian Bingham

brian.bingham@louisvillemsd.org

Chief Operations Officer

Louisville & Jefferson County Metropolitan Sewer District

Security Level: Email, Account Authentication (Optional)

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Timestamp

Editor Delivery Events

Status

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Agent Delivery Events

Status

Timestamp

Intermediary Delivery Events

Status

Timestamp

Certified Delivery Events

Status

Timestamp

Carbon Copy Events

Status

Timestamp

| Carbon Copy Events | Status | Timestamp |
|---|---|--|
| Stephanie Laughlin stephanie.laughlin@louisvillemsd.org Stephanie Laughlin Louisville MSD Security Level: Email, Account Authentication (Optional), Logged in Electronic Record and Signature Disclosure: Not Offered via DocuSign | <div style="border: 2px solid blue; padding: 5px; display: inline-block;">COPIED</div> | Sent: 1/9/2026 04:23 PM Viewed: 1/9/2026 05:28 PM |
| Jacquelyn Quarles Jacquelyn.Quarles@louisvillemsd.org Deputy General Counsel Louisville & Jefferson County Metropolitan Sewer District Security Level: Email, Account Authentication (Optional) Electronic Record and Signature Disclosure: Not Offered via DocuSign | <div style="border: 2px solid blue; padding: 5px; display: inline-block;">COPIED</div> | Sent: 1/14/2026 07:43 AM |
| James A. Parrott tony.parrott@louisvillemsd.org Executive Director Louisville MSD Security Level: Email, Account Authentication (Optional) Electronic Record and Signature Disclosure: Not Offered via DocuSign | <div style="border: 2px solid blue; padding: 5px; display: inline-block;">COPIED</div> | Sent: 1/14/2026 07:43 AM |
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