



CITY OF LIMA, OHIO

David J. Berger, Mayor

50 Town Square Lima Ohio 45801-4900 419/228-5462 Fax 419/221-5214
www.cityhall.lima.oh.us

August 7, 2017

Chief
Water Enforcement and Compliance Assurance Branch
Water Division
U.S. Environmental Protection Agency, Region 5
77 West Jackson Blvd
Chicago, Illinois, 60604

RECEIVED
AUG 09 2017
OHIO E.P.A.
N.W.D.O.

Re: CASE: 3:14-CV-02551-JZ Doc #5 Filed: 01/13/15

This letter is sent pursuant to Paragraphs 58, 64, 65 and 69 of the Lima Consent Decree. The incident that occurred at the Lima WWTP on July 22, 2017, in which the WWTP suffered a direct lightning strike, constituted a force majeure event. Therefore, to the extent that any noncompliance with the Consent Decree resulted from that incident, we request that the noncompliance be excused, and that any stipulated penalties be waived. The circumstances involved in the incident, and Lima's efforts to address the effects of the force majeure event, are detailed in the attached report that was filed on July 31, 2017. If you have any questions or need any additional information, please let me know.

I certify under penalty of law that the information contained in or accompanying this (submission/document) is true, accurate and complete. As to (the/those) identified portion(s) of this (submission/document) for which I cannot personally verify (its/their) truth and accuracy, I certify as the official having supervisory responsibility for the person (s) who, acting under my direct instructions, made the verification, that this is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment for knowing violations.


Michael H. Caprella
Director of Utilities
City of Lima, Ohio

Attachment

cc: David J. Berger, Lima City Mayor
Fred P. Andes, Barnes & Thornburg LLP
Stephen P. Samuels, Frost Brown Todd LLC
File



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July 31, 2017

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Water Division
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77 West Jackson Blvd
Chicago, Illinois, 60604

Re: CASE: 3:14-CV-02551-JZ Doc #5 Filed: 01/13/15

This letter is sent pursuant to Part VII, Section A, 34, regarding an incident that occurred at the Lima WWTP on July 22, 2017. The incident was reported to Ohio EPA NWDO on July 22, 2017 via telephone and through the central office hotline number. The Incident ID# is: 1707EPA0000654-1001.

Time of and discovery of discharge:

At 4:50 a.m. on July 22, 2017.

Approximate amount and characteristics of discharge:

Unknown

Stream affected by discharge:

Ottawa River

Circumstances which created the discharge:

The WWTP suffered a direct lightning strike to an area of the plant that contains the main electrical switch gear equipment. The result was complete loss of power throughout the plant. A backup diesel generator was started, but damage to the switch gear prevented the distribution of that backup power. Without pumping capability, many areas of the plant flooded, including lower level equipment areas that contained even more electrical components. Much of what has been damaged and to what extent is still being evaluated.

Names of persons with knowledge of circumstances:

Eric Markley (WWTP Supervisor), Shawn Dershem (WWTP Operator), Scott Rapp (WWTP Operator), David Sherwood (WWTP Operator), Michael Caprella (Director of Utilities), Saul Allen (Deputy Director of Utilities), David Schnipke (Environmental Compliance Manager).

Remedial measures taken:

With no pumping capability, immediate steps were taken to limit the flow coming to the plant, which included the immediate shutdown of the Baxter Street Pump Station and the two 54" interceptors leading to the plant. The CSO structures located on the Ottawa River served as the relief points to avoid mass upstream flooding of the entire sewer system. The only flow to the plant at that point was from a 36" gravity main. After approximately six hours (11:00 a.m.) of work on the switch gear and some improvised wiring, two effluent pumps and a storm water pump were able to be brought online and begin pumping flow out of the plant. At approximately 4:00 p.m., partial power was in place to the blower building, providing air to the aeration tanks. The chlorine contact chambers were also brought back online at this time and the Baxter Street Pump Station was re-started. Full power to the blowers was attained at 5:30 p.m., at which point all treatment processes in the plant were back in operation.

Persons responsible for remedial measures:

Ultimately the person responsible for managing the remedial measures is Michael Caprella, Director of Utilities. In this case, all available WWTP personnel were called upon for emergency response. Additionally, engineers from various engineering firms and contractors associated with the recent headworks upgrade --- all very knowledgeable in the electrical distribution and pumping aspects of the plant --- responded immediately. Other City departments assisted the response by contributing labor and additional equipment.

Additional information:

Ms. Peggy Christie, OEPA NWDO, conducted an inspection of the facility on Tuesday, July 25th. This included a walk-through of all the flooded areas of the plant to document the extent of the damage and observe the emergency measures in place to keep the plant operational.

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