



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

May 26, 2017

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

Chief
Environmental Enforcement Section
Environment and Natural Resource Division
U.S. Department of Justice
DOJ No. 90-5-1-1-08433
PO Box 7611
Washington, D.C. 20044-7611

Chief
Environmental Enforcement Section
State of Ohio Office of Attorney General
30 East Broad Street, 25th Floor
Columbus, Ohio 43215-3400

Re: Sanitary Sewer Capacity, Management, Operation and Maintenance (CMOM) Program
United States and State of Ohio v. City of Lima
CASE: 3:14-CV-02551-JZ

On April 3, 2017, the City of Lima received a letter from the USEPA in response to the submission of Lima's CMOM Plan on July 10, 2015. The CMOM Program Plan is a requirement defined in Lima's Consent Decree entered into on January 13, 2015.

The letter indicated approval of the CMOM Program Plan contingent upon specified conditions and requested modifications. Following is Lima's line item response to the USEPA requested modifications:

Section 5.3 – Hydrogen Sulfide Monitoring and Control

- Describe how often the air valves on force mains are inspected and maintained for proper operation.
- ✓ *Prior to the CMOM plan development, Lima did not have a program to inspect or exercise the air release valves on any of the force mains throughout the system. As part of the CMOM plan, Lima will inspect and exercise all air release valves associated with the sanitary force mains on an annual basis.*

- On page 41, the CMOM Program Plan states that "most of the manhole locations affected by hydrogen sulfide issues enclose force main outlets." Provide clarification as to whether all manhole locations affected by hydrogen sulfide within the sanitary sewer system (SSS) have been lined. If all manhole locations affected by hydrogen sulfide issue have not been lined, provide a schedule for when all affected manholes will be lined.
- ✓ *The Bowman Road Area has five manholes downstream of a force main discharge that have been identified as being affected by hydrogen sulfide. These manholes will be lined as part of the 2017 capital improvement budget. Lima's field crews continuously check for hydrogen sulfide damage during the regularly scheduled manhole inspections and any identified issues are addressed on a priority basis as schedule and budget allow.*
- Provide the percentage of manholes within the SSS that are currently lined, and the number of manholes within the SSS that Lima plans to line in the future. Include the total percentage of manholes within the SSS expected to be lined when lining activities are complete.
- ✓ *The total number of lined manholes in the SSS is now at 106, which is 0.04% of the total number (2,665) of manholes in the SSS. There are several force mains that have been connected to the City's sewer system in the Bowman Road area in the last few years. The manholes immediately downstream of these connections are scheduled to be lined in 2017. It is not expected that lining activities will ever be complete, as manholes are continuously being inspected for deterioration/structural integrity. Therefore, a total percentage of manholes lined at completion has not been included. Any manholes found in need of repair are identified and considered for possible lining activity.*
- With respect to hydrogen sulfide control, the CMOM Program Plan only discusses the lining of manholes, and does not describe pipe lining within the SSS. Describe any SSS pipe lining activities completed to date, and Lima's plan for any future SSS pipe lining.
- ✓ *Hydrogen sulfide issues that require pipe lining are identified during routine inspection activities and are prioritized and scheduled into the next available CIPP project. The City has lined 58,087 feet of sanitary sewer lines in the SSS. Lining projects are prioritized and scheduled as funding allows. A \$7M lining project in the combined system is currently at the 60% design stage and will be advertised for bid in the last quarter of 2017.*

Section 5.5 – Emergency Preparedness and Response

- Revise this section to include a description of the training provided with respect to Lima's Sewer Overflow and Emergency Response Plan (SOERP), including personnel who receive the training, a description of the training, and training frequency.
- ✓ *Training will include employees reading the SOERP annually and signing a form (see attached) to acknowledge that they have done so. A full description of the training is included in the Standard*

Operating Procedures included in the SOERP, but the main focus is on actions such as interacting with the public, calling the appropriate emergency agencies/personnel and taking any immediate necessary actions to mitigate the severity of any overflow.

All Supervisors, Operators, Assistant Operators and Sewer System Technicians are required to receive the training. Names of City personnel required to receive training will be updated annually at a minimum but also anytime (a) there is a change in an employee's job classification; or (b) an employee retires; or (c) a new employee is added.

- *Revise the SOERP, provided as Appendix H to the CMOM Program Plan, to identify the SSO outfalls for which Lima has posted permanent signage to provide warning to the public of potential health risks due to sewage contamination. EPA specificity requests that permanent warning signs be posted at the outfalls identified by the Annual SSO Report ID numbers 302 and 337, as these SSOs discharge directly to Lost Creek and Pike Run, respectively (as opposed to discharging through a storm drain).*
- ✓ *A warning sign is in place at SSO #302 (Pike Run). Another will be placed at SSO #337 (Lost Creek) within 90 days.*
- *Revise the SOERP to describe how the Environmental Compliance Manager determines whether temporary, warning signs related to SSO discharges are warranted.*
- ✓ *The Environmental Compliance Manager (or authorized Utilities Administrator) will determine whether temporary warning signs related to SSO discharges are warranted based on conditions that imminently and substantially endanger human health. This would include scenarios that have the potential for secondary human contact such as swimming, wading, fishing, boating, etc., or the possibility of affecting a drinking water source.*

Section 6.1 – Maintenance and Budgeting

- *The CMOM Program Plan states that a separate fund has been developed for emergency maintenance. Revise this section to include the amount currently available in the fund and a description on how the fund is maintained.*
- ✓ *The City has a \$250,000 contingency line item in the annual budget for any emergency sanitary needs. It is funded through the standard sewer rate payer base.*

Section 6.2 – Maintenance Scheduling

- *The CMOM Program Plan states that the WWTP Division attempts to keep a minimal back log of maintenance activities. Describe the current back log of collection system maintenance activities and how/when Lima plans to address the back log.*
- ✓ *The WWTP no longer has a backlog of maintenance activity following completion of the lift station rehabilitation project in 2016. Any future system backlog will be tracked and updated using the WWTP's maintenance management software (Cityworks).*

Section 6.4 and 6.5 – Sewer Cleaning/Closed Circuit Television Inspection

- With the exception of a specified 40,000 linear feet of pipeline that will be cleaned monthly/annually, Lima proposes to achieve a SSS cleaning and inspection schedule of 10% of the system per year, after the 3rd year of CMOM implementation. Either (1): revise the CMOM Program Plan to include a sewer cleaning and inspection schedule of at least once every five years (with the exception of those areas already identified for monthly/annual cleaning and inspection); or (2) provide an explanation as to how Lima determined that a 10% per year cleaning and inspection schedule is sufficient to effectively identify and address collection system blockage and defects that contribute to SSOs.
- ✓ *(1) Lima will revise the CMOM Program Plan to reflect a cleaning schedule of the entire SSS at least once every 5 years.*
- ✓ *(2) Lima proposes to keep the 10 year inspection schedule. Proper inspection and condition assessment of a mainline is much more labor intensive than cleaning. Lima has just two inspection trucks and two PACP certified technicians on staff at this time. More operators are in the process of getting certified, but current resources are not available to assess the entire SSS at a 5-year frequency.*
- Page 54 of the CMOM Program Plan states Lima has two sewer cleaning trucks. Page 55 states it has four sewer cleaning trucks. Revise the CMOM Program Plan to clarify the number of sewer cleaning trucks available.
- ✓ *Lima's Field Services Division has a total of 4 cleaning trucks ---- 2 combination vacuum / jetter trucks and 2 high velocity jetter trucks (without vacuum).*
- The CMOM Program Plan states that high velocity jet washers are used to clean SSS. Describe whether and how Lima removes sediment from the SSS during jet washing, including a description of the equipment used.
- ✓ *Most sediment is removed from the system by use of a vacuum nozzle. Larger debris is removed manually using mesh baskets lowered into the manhole. Fine sediment is generally flushed downstream.*

Section 8 – Sewer System Capacity Evaluation

- Provide a copy of the Evaluation of Private Property Infiltration and Inflow in the Separate Sanitary Sewer System report discussed on page 59 of the CMOM Program Plan.
- ✓ *A copy of the requested report will be submitted with the revised CMOM Program Plan.*
- Update the CMOM Program Plan to describe how the City of Lima intends to address inflow and infiltration into the sanitary sewer system from private sewer laterals.

- ✓ *The City has existing language in the sewer use ordinance 1040.241(D) that stipulates no clean water sources are to be connected to the sanitary sewer system. The City has a Water-in-Basement (WIB) program that provides financial assistance to homeowners that experience basement flooding issues. The program separates the storm water drains from the sanitary lateral on private property. Over 100 homes to date have benefited from the WIB program.*

Section 8.5 – Manhole Inspections

- Lima proposes to inspect manholes once every 10 years. However, CMOM guidance recommends routine inspection of manholes every one to five years. Revise the manhole inspection schedule to include a frequency of once every one to five years.
- ✓ *The manhole inspection schedule will be revised to reflect a 5-year frequency.*

Section 9.0 – Rehabilitation

- Provide a copy of the City of Lima, Ohio Separate Sanitary Sewer System Pump Station Condition Assessment, August 6, 2012, referenced on page 64.
- ✓ *A copy of the requested report will be submitted with the revised CMOM Program Plan.*

Section 10.0 – CMOM Program Future performance Goals and Recommendations

- Table 10-1 of this section provides action items for each CMOM component currently given a performance rating of "defined" or "initiated." Revise the CMOM Program Plan to include a schedule for all action items listed in Table 10-1.
- ✓ *See revised Table 10-1 (attached) that includes schedules for CMOM components that were shown as "defined" or "initiated". The proposed revised table includes a new column "schedule" with proposed implementation years for the action items.*

Append A – Sewer Asset Risk Scoring and Renewal Forecasting Technical Memorandum

- Page 34 of the memorandum states that Lima's current budget levels are "well below" the anticipated average annual investment levels that are expected to be required to .. effectively manage risks over the long term. The report recommends \$1.5 million in annual capital investments for wastewater assets. Revise the CMOM Program Plan to describe how Lima plans to address the reported budget deficiency.
- ✓ *Lima plans to maintain the capital asset investment plan through (a) annual rate increases, (b) grants and/or 0% interest loan money, (c) borrowing through WPCLF, etc.*

The CMOM Program Plan is being updated to include the requested revisions listed above. The revised CMOM Program Plan and copies of the requested reports will be submitted within 30 days of this correspondence. If you have any questions or need any additional information, please feel free to contact this office.

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

cc: Randy Stone, DOJ
Nicole Cantello, USEPA Region 5
Summer Plantz, Office of Ohio Attorney General
Erin Sherer, OEPA
Elizabeth Wick, OEPA
Christopher Kosto, OEPA
Fred Andes, Barnes & Thornburg LLP
Stephen Samuels, Frost Brown Todd LLC
David Berger, Lima City Mayor
Anthony Geiger, Lima City Law Director
David Schnipke, Environmental Manager
File

Table -10-1: CMOM Program Current and Future Goal Performance Rating and Action Items

CMOM Component	Current Performance Rating	Future Performance Goals	CMOM Program Improvements?	Action Items	Schedule (Year)
<i>Collection System Management</i>					
Organizational Structure and Availability	Implemented	Implemented	N		
<u>Training</u>	Defined	Implemented	Y	Develop SOPs in a central location to be used for training new employees and as a refresher tool	1
<u>Management Information Systems</u>	Defined	Optimized	Y	Develop schedule, priority ranking system, and data entry updates as described below	1-5
<u>Cityworks</u>	Defined	Optimized	Y	• Create automated schedules for planned rotating maintenance • Create prioritization method for reactive maintenance/ rehab work • Input data collected from work orders into Cityworks	1-5
<u>GIS Mapping and Record Drawings</u>	Optimized	Optimized	N		
<u>Communication and Customer Service</u>	Optimized	Optimized	N		
<u>SSO Notification Program</u>	Initiated	Implemented	Y	Develop Sewer Overflow and Emergency Response Plan	1
<u>SSO Occurrences</u>	Defined	Implemented	Y	• Create template for SSO reporting for semi-annual Progress Report • Develop Sewer Overflow and Emergency Response Plan • Develop a Root Cause Analysis SOP	1
<u>WIB Occurrences</u>	Implemented	Implemented	N		
<u>Legal Authority</u>	Implemented	Implemented	N		
<u>Sewer Use Ordinances</u>	Implemented	Implemented	N		
<u>User Rate Structure</u>	Implemented	Implemented	N		
<i>Collection System Operation</i>					
<u>O&M Budget</u>	Optimized	Optimized	N		
<u>Compliance and Water Quality Monitoring</u>	Implemented	Implemented	N		
<u>Hydrogen Sulfide Monitoring and Control</u>	Implemented	Implemented	N		

CMOM Component	Current Performance Rating	Future Performance Goals	CMOM Program Improvements?	Action Items	Schedule (Year)
<u>Safety</u>	Defined	Optimized	Y	- Develop SOPs for standard and emergency CMOM activities including safety and training information - Make the training and safety material available for all employees in a central location	1
<u>Emergency Preparedness and Response</u>	Initiated	Implemented	Y	- Develop and refine SOPs for emergency situations - Create call lists of important phone numbers and contact information - Create a Sewer Overflow and Emergency Response Plan	1
<u>Modeling</u>	Implemented	Implemented	N		
<u>Mapping</u>	Implemented	Implemented	N		
<u>Design and Construction</u>	Implemented	Implemented	N		
<u>Capacity</u>	Implemented	Implemented	N		
<u>Pump Station Operation</u>	Defined	Optimized	Y	- Develop work order forms for pump station maintenance with regularly scheduled recurrences in Cityworks - Establish remote access to enter into Cityworks inspection, repair, and maintenance performed on pump stations	1-5
<u>Pump Station Inspection</u>	Initiated	Optimized	Y	Deploy a tablet with a wireless connection to electronically complete pump station inspection forms	1-5
<u>Pump Station Emergency Response and Monitoring</u>	Initiated	Implemented	Y	Develop a SOP to investigate the cause of pump station failure and action to prevent future failures	1
<u>Pump Station Recordkeeping</u>	Defined	Implemented	Y	Develop electronic forms for reporting in the Cityworks System	1
<u>Force Mains and Air/Vacuum Valves</u>	Implemented	Implemented	N		
<u>Collection System Maintenance</u>					
<u>Maintenance Budgeting</u>	Implemented	Implemented	N		
<u>Planned Maintenance</u>	Implemented	Optimized	Y	Create interval recurring schedules for planned maintenance and items to be included in the semi-annual CMOM section of the Consent Decree Progress Report	1-5

CMOM Component	Current Performance Rating	Future Performance Goals	CMOM Program Improvements?	Action Items	Schedule (Year)
<u>Maintenance Scheduling</u>	Initiated	Optimized	Y	- Incorporate a rotating planned maintenance schedule of sewer cleaning, CCTV, and manhole inspections into Cityworks. - Integrate the maintenance lists into Cityworks to automate scheduled reminders, streamline data entry and follow-up maintenance scheduling - Integrate the pump station inspection reporting into Cityworks to streamline data entry and maintenance scheduling	1-5
<u>Maintenance Right-of-Way</u>	Implemented	Implemented	N		
<u>Sewer Cleaning</u>	Defined	Implemented	Y	Incorporate the rotating planned maintenance schedule of sewer cleaning, CCTV, and manhole inspections into Cityworks	1-5
<u>Cleaning Equipment</u>	Defined	Implemented	Y	Create 'store rooms' in Cityworks to keep track of CMOM equipment inventory	1-5
<u>Chemical Cleaning and Root Removal</u>	Defined	Implemented	Y	Incorporate the root list into Cityworks with pre-defined time interval reminders	1-5
<u>Parts and Equipment Inventory</u>	Initiated	Implemented	Y	Create 'store rooms' in the Cityworks program that will be used to track the use and availability of tools, materials and equipment related to CMOM activities.	1-5
<u>Management Information Systems: Performance Indicators</u>					
Performance Indicators	Initiated	Optimized	Y	Develop search queries to easily sum totals for 6 month CMOM Progress Report and to get up-to-date estimate of progress	1
<u>Sewer System Capacity Evaluation (SSES)</u>					
<u>Sewer Cleaning Related to I/I Reduction</u>	Defined	Implemented	Y	Incorporate the rotating planned maintenance schedule of sewer cleaning, CCTV, and manhole inspections into Cityworks	1-5
<u>Internal TV Inspection</u>	Implemented	Implemented	N		
<u>Flow Monitoring</u>	Implemented	Implemented	N		
<u>Smoke Testing and Dyed Water Flooding</u>	Implemented	Implemented	N		

CMOM Component	Current Performance Rating	Future Performance Goals	CMOM Program Improvements?	Action Items	Schedule (Year)
<u>Manhole Inspection</u>	Defined	Optimized	Y	• Create interval recurring schedules for planned manhole inspections • Integrate the manhole inspection reporting into Cityworks to streamline data entry and maintenance scheduling	1-5
<u>Survey and Rehabilitation (general)</u>	Initiated	Implemented	Y	Develop a method to prioritize rehab work in Cityworks	1-5
<u>Rehabilitation</u>					
<u>Manhole Repairs</u>	Initiated	Implemented	Y	Develop a method to prioritize rehab work in Cityworks	1-5
<u>Mainline Sewers</u>	Initiated	Implemented	Y	Develop a method to prioritize rehab work in Cityworks	1-5
<u>Pump Stations</u>	Implemented	Implemented	N		

City of Lima, CMOM Sanitary Overflow Emergency Response Plan (SOERP) Training

The City of Lima Field Services employees listed below acknowledge they have read the SOERP as defined in the CMOM Program Plan. The plan defines the actions required in the event of a potential harmful overflow.

* The SOERP is required to be reviewed annually *

Employee Name	Classification	Date of Review	Signature
Archer, Chase	Asst Operator		
Bambaloff, Keith	Operator		
Beach, Mike	Operator		
Beemer, Steve	Scheduler / Planner		
Bodine, Sam	Operator		
Boroff, Shawn	Asst Operator		
Brown, Dave	Operator		
Buckmon, James	Operator		
Coffey, Mike	Asst Operator		
Cole, Ralph	Operator		
Coon, Robert	Operator		
Cressman, Don	Operator		
Delph, Sandi	Scheduler / Planner		
Epley, Dave	Asst Operator		
Etzkorn, Mark	Sewer System Technician		
Fetter, Branden	Operator		
Hall, Greg	Operator		
Huber, Larry	Supervisor		
Hunter, Amy	Operator		
Hutchinson, Brad	Operator		
Johns, Tim	Asst Operator		
Kennedy, Lance	Asst Operator		
Lingenfelter, Derek	Asst Operator		
McPheron, Alex	Asst Operator		
Point, John	Operator		
Reaman, Andy	Operator		
Scarberry, Ed	Operator		
Sheffield, Audrey	Asst Operator		
Spring, Tim	Sewer System Technician		
Stidham, Tim	Asst Operator		
Stimmel, Jeff	Asst Operator		
Sweet, Steve	Asst Operator		
Wilkins, Zach	Asst Operator		

Hydrostatic Discharge Inspection FAQs – Draft Guidance – August 1, 2017

DSW-CO has received a number of questions from district offices related to hydrostatic discharge inspections; the questions and recommendations are summarized below.

Site Selection

Q: What sites related to the hydrostatic permit NOI are we to observe?

A: The Director does not expect us to look at all sites. We need to observe at least 25% of the sites. In choosing sites, include the sites where discharges are prohibited or your judgment of the most sensitive sites/receiving waters.

Q: Are we to observe 25% of the discharge sites or 25% of the sensitive water discharge sites?

A: The sites selected should be a mix of:

- Sites originally proposed in the NOI but were not approved for discharge;
- Approved sites to waters of particular concern such as streams of particular ecological significance or concern (but that aren't excluded from the approval) or streams that are associated with PWS or other that are highly recreated. For example, if a stream is known to be impaired for sedimentation or other solids related issues, you may want to include such a site on the observation list.
- Typical discharge sites to observe normal operations

The district can use its judgement based on specific factors related to the sites or situation to select sites. A rough rule of thumb would be to have 15% of the sites be to approved sites of waters of concern (2nd bullet), 5% at regular, typically site operations, and 5% of sites that were not approved.

Q: Is there any direction about when and how long we should be observing the discharges? For example, do we need to be there at the beginning? The end? The middle?

A: Based on recent inspections, it may be best to observe discharges towards the end of the discharge in order to properly document the potential most turbid discharge. However, a small number of field inspections should also be done at the beginning and middle to further understanding and documentation of what is typical for these discharges.

Field Observations

The purpose of the inspections is to document potential compliance with the GP and, if issues are observed or reported, to assist the company to minimize impact to receiving waters.

Key items to document during the inspection:

- Is erosion due to the discharge occurring? If so, what actions is the company taking to correct the situation? How serious is the erosion, and is it due entirely or in part to the discharge? Permit excerpt:

The test water shall be discharged in a proper way to prevent erosion of soil or other materials into surface water or cause infiltration into ground water. Barriers such as splash pads, straw bales, silt fences and vegetated buffer zones shall be used.

- The elapsed time since the discharge began that the field observations are occurring at. For example, observation (picture) was taken on 8/1/17 at 14:00. Discharge began 7/31/17 at noon as reported by John Doe of Company X. Time elapsed 26 hours.
- The observed turbidity of the discharge. For example, thick and muddy, very turbid, somewhat turbid, cloudy, clear, etc. Yes, it is a subjective determination. If the district has a monitoring device that might work or field staff have recommendations here, please use.
- Comparison of the source water to the discharge water. Is or was the source water turbid when withdrawn? Was chemistry taken?
- Is the discharge creating a visible plume in the receiving water? Is the discharge creating a visible sheen? Are the general effluent limitations being met?:

General Effluent Limitations. The effluent from hydrostatic test water shall, at all times, be free of substances:

- 1. In amounts that will settle to form putrescent, or otherwise objectionable, sludge deposits; or that will adversely affect aquatic life or water fowl;*
- 2. Of an oily, greasy, or surface-active nature, and of other floating debris, in amounts that will form noticeable accumulations of scum, foam or sheen;*
- 3. In amounts that will alter the natural color or odor of the receiving water to such degree as to create a nuisance;*
- 4. In amounts that either singly or in combination with other substances are toxic to human, animal, or aquatic life;*
- 5. In amounts that are conducive to the growth of aquatic weeds or algae to the extent that such growths become inimical to more desirable forms of aquatic life, or create conditions that are unsightly, or constitute a nuisance in any other fashion;*
- 6. In amounts that will impair designated instream or downstream water uses.*

Q: Are we to include observations of upland discharges?

A: Only if associated with a potential or actual discharge to a water of the state. Otherwise, just note the upland discharge was checked and wasn't observed to be interacting with a water of the state.

- Inspectors should have the company estimate the discharge flow at the time of inspection. A bucket test, if no other method is available, can be sufficient. Please note

if the observed flow is typical or if it is not typical of that particular release, how it is different. For example, the observed flow was less, similar to, or more than the flow during the majority of the discharge. The estimated flow should be compared with the flow noted on the NOI.

Field Sampling:

During the inspection/field observation, the inspector should discuss with the company representative how a representative sample as per the permit is being collected for each parameter listed in the permit. How is the composite sample representative of an entire 24 hours of discharge? Is the most turbid part of the discharge included in this composite? If not, it needs to be included. If the concentration of a parameter is expected to change throughout the discharge, how or when is a representative grab sample collected?

A field inspector should make sure the composite sample being collected includes a grab of the turbid water and the ratio of turbid to 'clear' water should be representative of the discharge. It is supposed to be based on volume but for in the field observation, you could judge it based on the color and the relative time the turbid vs clear discharge has occurred. If 1/3 of the time of discharge was turbid, then the composite should look about 1/3 less turbid – a rough rule of thumb.

Inspectors should have field sampling equipment available should sample collection be warranted.

Compliance. Follow up, and Other Issues

The Director wants us to report back quickly on any impacts or adverse incidents that occur so that he can consider them in any legal actions/documents that we prepare.

Discharges near prohibited waters cannot be allowed to reach the stream. BMPs such as infiltration practices, land application, storage ponds or similar need to be in place to prevent discharge to prohibited waters.

Q: The company expects the first line to be active in 30 days. Once the first line is active, the scene becomes "hot". This means our staff must wear flame retardant clothing when on site. Should we be purchasing this for our staff? If ER already has this equipment, can they become our eyes in the field to save us the expense of purchasing?

A: Once the line becomes active, it is unlikely a discharge to a water of the state should occur. If a discharge does occur at that time, it may be appropriate to report it to the spill line and have ER respond. ER should not be contacted for routine inspections unless the district chief feels it is warranted and coordinates with ER management. DAPC district staff do O&G inspections that may have similar safety requirements. District management should

coordinate with the respective divisions to determine who from the district may be best suited to inspect a line once it becomes hot. More coming soon on this issue.

All observations made in the field should be carefully documented with date, time, and photo information noted. If violations of the permit are observed in field, all feasible efforts should be made to remedy the violations immediately. Inspectors should contact their management as soon as possible.

Source vs Discharge Quality

DSW CO is evaluating if an intake credit approach to discharge compliance is doable. More on this issue soon. Source water turbidity/TSS levels should be sampled by the company. The permit does assume the source water is relatively clean. DSW CO currently evaluating options as field information is submitted to us.