January 22, 2016

Noel Vargas (WC-15J)
Water Enforcement and Compliance Assurance Branch
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, Illinois 60604

RE: City of Rocky River: OH0030503

U.S. Environmental Protection Agency Region 5 Order City of Rocky River 2014 Annual Progress Report

Dear Mr. Vargas:

I certify under penalty of law that these documents 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 the information, the information submitted is, to the best of my knowledge and belief, true and 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.

Pamela E. Bobst, Mayor City of Rocky River



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RE: City of Rocky River: OH0030503

U.S. Environmental Protection Agency Region 5 Order City of Rocky River 2014 Annual Progress Report

Dear Mr. Vargas:

Enclosed is the City of Rocky River's 2015 Annual Progress Report as well as my certification as to the accuracy and completeness of these documents.

The 2015 Annual Progress Report has been composed by the Wastewater Treatment Plant Superintendent and reviewed by the City with our consulting engineer and the Public Safety-Service Director. A public notice will be placed in the local news paper indicating the availability of this report and a link to this report will be placed on the City's website.

I can be reached at 440-331-0600 to discuss these documents and thank you in advance for your time and effort in this regard.

Sincerely,

Pamela E. Bobst

Mayor

Encis.

cc: Safety-Service Director Costello

Director of Law Berner Consulting Engineer Mackay WWTP Superintendent Rosemark

Erm Gomes, OEPA NEDO

City of Rocky River 2015 Annual Progress Report

Environmental Protection Agency Order Docket No. V-W-09-AO-11 NPDES PERMIT OH0030503

January 22, 2016

The United States Environmental Protection Agency's (USEPA) Administrative Order, dated September 29, 2009, revised April 27, 2010, required the City of Rocky River under paragraph 25 to submit an annual progress report conveying the following information:

"25(a) (Revised April 27, 2010 Administrative Order) Respondent's progress on the projects described in the SSES implementation schedule, including specific references to the projects in that schedule. Respondent must identify any deficiencies and all steps that have been taken to correct the deficiencies."

"25(b) (Revised April 27, 2010 Administrative Order) Respondent's progress in implementing the CMOM program once approved and incorporated into this Order."

"25(c) (Revised April 27, 2010 Administrative Order) An inventory of all SSOs from the Respondent's sewers from the previous year, identifying the dates, sources, estimated volumes, receiving waters and principal pollutants contained in the discharges. Respondent must also issue a press release informing the public of the availability of the inventory and make the inventories available on its principle webpage."

The following is information intended to fulfill the requirements of the above language:

Part 25(a): Progress of Sewer System Evaluation Study (SSES) and associated projects

Introduction

The Rocky River SSES Phase 1 was undertaken in 2011 for a cost of \$607,330 and is the first of a four (4) phased approach of Sanitary Sewer Evaluation Studies being completed by the City in response to the Administrative Orders issued to the City of Rocky River by the United States Environmental Protection Agency. The Administrative Orders directed the City to eliminate its remaining SSO's as well as reduce the amount of rain derived water that is transported to the Rocky River Waste Water Treatment Plant through the sanitary collection system. This is to be accomplished through a long term capital improvement plan that includes a multi-phased, multi-year SSES investigation and subsequent rehabilitation of the collection system.

On March 29, 2012, the City of Rocky River discussed with the U.S. EPA, with a verbal agreement being reached, to suspend its work on the future phases of the SSES in order to concentrate efforts and funds to close the two (2) remaining sanitary sewer overflows. The City of Rocky River continued concentrating efforts with construction projects intended to begin eliminating the two (2) remaining sanitary sewer overflows.

Existing Collection System Background

The City of Rocky River owns and maintains separate storm and sanitary sewer collection systems within the city. There are four (4) sanitary pump stations in addition to one (1) storm pump station. The City of Rocky River has a number of pumping stations throughout the city that, coupled with the gravity collection system, convey the City's sanitary sewage to the jointly owned Rocky River Wastewater Treatment Plant (RRWWTP) located on Lake Road in the northern portion of the City. The RRWWTP is jointly owned by the Cities of Rocky River, Westlake, Bay Village and Fairview Park. A total of eight pipes discharge sewage at or near the head-works of the WWTP. Five of the eight interceptors convey flows from the City of Rocky River. The sewage conveyed and treated at the RRWWTP is ultimately discharged to Lake Erie.

The City's storm sewer collection system collects and transports storm water to the various outfalls found within the City limits. In the case of excessive wet weather flow that enters the sanitary collection system, sewage that cannot be contained within the sanitary system is redirected to the storm sewer system through two (2) Sanitary Sewer Overflows (SSO's) in the sanitary collection system.

The two (2) active SSO's at the time of the SSES Phase 1 study are as follows:

- EPA ID# 302 Beach Cliff and Falmouth, upstream of the Beach Cliff Pump Station. The overflow manhole is located near the sidewalk at the south-west corner of the intersection of Beach Cliff Blvd. and Falmouth Drive.
- **EPA ID# 306** Westway and Magnolia. The overflow manhole is located in the street at the intersection of Westway Drive and Magnolia Drive.

Since the issuance of the Administrative Orders from the USEPA, the City has been able to close one (1) of the original three (3) SSO's through the implementation of sewer improvements in the area.

The following SSO is no longer active and has been eliminated:

• **EPA ID# 303** - Avalon and Falmouth. The overflow manhole was located in the sidewalk at the north-east corner of the intersection of Avalon Drive and Falmouth Drive.

Status of projects- past, current and planned

The following are construction projects that have been completed from 2012 through 2015, or are currently being completed, that will greatly reduce inflow and infiltration, and aid in the reduction and ultimate elimination of sanitary sewer overflow occurrences.

2014-2016

<u>Morewood Force Main: New</u> force main installed to move sanitary flow – heavy during rain events due to inverted sewers into to a large sanitary sewer – and away from the SSO 302. (Sewer Shed 5)

\$786,450.65 (construction complete – pump station electronic upgrades to be completed by February 2016)

2012-14

Frazier/Beachcliff Boulevard: Phase 1 Water Line Improvements (Sewer Shed 4)

Bid award: \$3.5 million - COMPLETED

(Cleveland Division of Water pledged funding to assist the City with these improvements)

2013-14

• Frazier Drive Sewer Replacement Sewer Project (Sewer Shed 4): This is the first of the planned projects that will lead to closing of sanitary sewer overflow EPA identification number 302, by replacing a leaking and inverted sewer main. Project publically bid. Project start date was January 2, 2014.

Bid Award/ OPWC Loan for \$3,277,120.00 COMPLETED

Hampton Road (Sewer Shed 8 and affecting Sewer Sheds 4 & 5)

Phase 3 - **\$2,500,000.00 COMPLETED**

Avalon Drive Improvements Phase I Water Main Rehabilitation (Sewer Sheds 3, 4 & 5: bid in early summer 2014 – Cleveland Division of Water approved the project and reviewed plans in February / March of 2014-\$900,000 COMPLETED
 Storm and sanitary sewer replacement began in 2015 and is scheduled for completion in 2016. This project will remove 18 homes from flowing towards SSO 302.

2014-15

- Avalon Drive (Sanitary and Storm) Improvements Phase II (Sewer Sheds 3, 4 & 5): Replacing approximately one mile of inverted sanitary and storm lines, residential "t" connections, and laterals. Construction commenced in July of 2015, October of 2016 scheduled completion date.
 \$5.9 million
- Morewood Parkway Force Main and Pump Station Improvements (Sewer Sheds 4 & 5: Construction commenced in July of 2015, February 2016 scheduled completion date.
 \$786,450
- Falmouth Pump Station: Replaced 2 of 5 pumps at the Falmouth pump station with new chopper pumps. These pumps will handle debris better, and maintain maximum continuous capacity to reduce SSO's at EPA ID overflow site 302. The wet well at the South Island pump station was sealed to reduce infiltration. \$40,000.00
- Westway Sewer Improvements (Sewer Shed 12): Water line replacement November 2015. Sewer work scheduled after water line replacement has been completed. The engineering has begun in 2016 for the \$1.765 million sewer improvements to reduce the sanitary sewer overflow to SSO 306.
- <u>Lakeview / Hampton</u> Sewer Improvements (Sewer Shed 12) Funding approved in 2015. The inverted sewers are collecting storm water through inverted manholes and triggering the SSO at 306. This project will reduce that amount of sanitary sewer overflows at this site. DOPWIC funding has been approved for this project. The water line work will proceed in 2016 with the sewer improvements commending in 2017. Engineer's estimate \$5.655 million.

<u>Part 25b: Progress of the Capacity, Management, Operation and Maintenance (CMOM)</u> <u>Program</u>

On October 22, 2010, the City of Rocky River submitted as required by the USEPA Order, a CMOM schedule and program manual. The City received the approval from the USEPA for the CMOM program in a letter dated December 30, 2010. The City is currently implementing the approved CMOM program. During 2011, the completed CMOM manual has been dispersed to various departments involved in the implementation of the program.

Progress of the CMOM Program in year five (2015). The following goals in year five have been achieved:

- 1) Conduct an annual review of CMOM Program: review previous year's BMPs logs. Review CMOM Program with Fire Department. Solicit recommendations from various departments and make updates and changes to the City's CMOM Program. Our annual review determined that there is a need for a residential inflow program to be developed and that the City's time and resources would be best invested in creating and developing that program and not in changing the CMOM at this time.
- 2) Continuing education to be offered on site for Class II Certification. This will be collaborative training with surrounding communities. A confined space training was provided with possible credit hours (taught by the Bureau of Workman's Compensation).
- 3) Goals to develop a residential inflow reduction program are to be developed in 2016.

Part 25c: Inventory of SSO occurrences for 2015, and statement of principal pollutants

EPA			
ID#	Location Description	Date	Volume
306	Magnolia and Westway	1/4/2015	0.102
306	Magnolia and Westway	4/9/2015	0.020
302	Beachcliff and Falmouth	5/30/2015	0.010
306	Magnolia and Westway	5/30/2015	0.030
302	Beachcliff and Falmouth	6/13/2015	0.006
306	Magnolia and Westway	6/13/2015	0.120
302	Beachcliff and Falmouth	6/14/2015	0.014
306	Magnolia and Westway	6/14/2015	0.002
302	Beachcliff and Falmouth	6/15/2015	0.089
306	Magnolia and Westway	6/15/2015	0.602
302	Beachcliff and Falmouth	6/22/2015	0.001
302	Beachcliff and Falmouth	6/23/2015	0.068
306	Magnolia and Westway	6/23/2015	0.476
302	Beachcliff and Falmouth	6/27/2015	0.103
306	Magnolia and Westway	6/27/2015	1.735
306	Magnolia and Westway	7/7/2015	0.025
306	Magnolia and Westway	7/9/2015	0.210
306	Magnolia and Westway	7/9/2015	0.016
306	Magnolia and Westway	7/13/2015	0.002
306	Magnolia and Westway	8/10/2015	0.253
302	Beachcliff and Falmouth	8/14/2015	0.001
306	Magnolia and Westway	8/15/2015	0.030
302	Beachcliff and Falmouth	8/30/2015	0.010
306	Magnolia and Westway	8/30/2015	0.013
306	Magnolia and Westway	9/12/2015	0.487
306	Magnolia and Westway	10/28/2015	0.001
306	Magnolia and Westway	12/27/2015	0.180

All above recorded sanitary sewer overflows occurred during wet weather (rain and/or snow melt) events due to excessive infiltration and inflow (I&I) within the City of Rocky River sewer system. The City of Rocky River has implemented a long-term maintenance and rehabilitation program to clean, repair and improve the sewer system and reduce I & I and sanitary sewer overflows.

All sanitary sewer overflows have been reported to the United States Environmental Protection Agency Region 5, the Ohio Environmental Protection Agency and the Cuyahoga County Board of Health as required by the Order and the Ohio EPA NPDES Permit 3PE00009*KD issued to the Rocky River Wastewater Treatment Plant.

Principal Constituents: Sampling was not conducted in 2015. Data from previous years' grab samples has indicated that the primary constituents have remained consistent with typical domestic wastewater streams: CBOD levels ranging from 16 to 79 mg/L; TSS in the range of 49 to 500 mg/L; Total Phosphorus from 0.5 to 3.51 mg/L; Ammonia from 1.08 to 7.84 mg/L, and E Coli Too Numerous To Count (TNTC). Samples of plant influent during the high flow events that precipitated the above listed SSO's are also consistent with the above data. The RRWWTP pre-treatment program is currently compliant, and no sampling events at the identified SIU locations have indicated any other constituents of concern. Should the USEPA require more detailed analysis, the RRWWTP can commence sampling again in the future.