



Greg J. Davies, Director  
Department of Public Utilities  
City of Columbus  
910 Dublin Road  
Columbus, OH 43215

Re: WWMP Amendments

Dear Director Davies:

I am writing to formalize an agreement made between our respective staffs regarding Columbus' path toward Integrated Planning, which includes both Green Infrastructure and achievement of the goals of the approved Wet Weather Management Plan (WWMP). In my approval letter of August 24, 2012, I indicated that there were still outstanding issues with the City's proposal regarding Large Scale System Strategies (LSSS) under the WWMP, and asked that a report be submitted by October 31, 2012 with a more detailed analysis of the situation.

The City subsequently submitted a report on October 31, 2012, and our respective staffs met to discuss this report on November 21, 2012. In a December 4, 2012 letter, Ohio EPA provided comments on the City's proposal outlining the agreement reached in that meeting. On December 10, 2012, the City responded to the comments, agreeing to the options discussed in Ohio EPA's letter of December 4, and provided a schedule of activity associated with achieving LSSS implementation in accordance with the existing schedule in the approved WWMP.

The City has agreed to advance the installation of High Rate Treatment (HRT) technology from the current 2025 due date, so that installation will be complete by the current 2019 due date for completion of the Alum Creek Relief Tunnel, Phase A (ART A). By substituting the HRT, specifically Chemically Enhanced Primary Treatment with Disinfection (CEPT) for ART A, the City has chosen to implement one LSSS sooner than another LSSS.

The results of the Integrated Planning Effort is due on September 30, 2015, as part of a WWMP modification request. The current WWMP requires that construction on ART A begin in 2014. The due date for the beginning of construction of ART A will be delayed until after the September 30, 2015 due date for the WWMP modification request to allow for consideration of ART A in the integrated planning effort. Columbus will submit its revised analysis regarding the construction of ART A in the September 2015, WWMP modification request.

With this letter I am approving the substitution of HRT/CEPT for ART A in order that the City might undertake the Integrated Planning Effort and still maintain the current schedule in the approved WWMP. The City has agreed to adhere to the following schedule for the implementation of HRT/CEPT that will achieve a discharge level of 30mg/l Total Suspended Solids averaged across 7 activations:

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Design Start: April, 2014

Start Construction: May, 2017

Complete Construction: December 16, 2019

I believe this approach allows for the City to begin storm water and CSO/SSO integrated planning, along with the inclusion of Green Infrastructure practices into the WWMP, while still protecting water quality.

If you have any questions, please contact George Elmaraghy, Chief, Division of Surface Water, at 614-644-2041.

Sincerely,



Scott J. Nally, Director  
Ohio Environmental Protection Agency

c: George Elmaraghy, Chief, DSW  
Isaac Robinson, Chief, CDO  
Paul Novak, DSW  
Mike Gallaway, DSW-CDO  
Sheree Gossett-Johnson, DSW-CDO  
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