

US EPA ARCHIVE DOCUMENT

APPENDIX B
Nine Minimum Controls Plan Performance Criteria

The City shall implement its Nine Minimum Controls (“NMCs”) Plan in its Combined Sewer System (“CSS”) area and submit a NMCs annual report, pursuant to Section IX of the Consent Decree, demonstrating compliance with the NMCs Plan performance criteria as follows:

- I. Proper Operation and Regular Maintenance Program (NMC – 1)
 - A. The City shall maintain an organization (e.g. the Line Maintenance Division) with personnel responsible for various aspects of the operation and maintenance (“O&M”) program. This organization shall perform regular inspections, cleaning and repair of the system.
 - B. The City shall allocate adequate resources (i.e. personnel and capital) to maintain O&M activities.
 - C. The City shall maintain a list of the facilities (i.e. overflow weirs) critical to the performance of the CSS, and update as necessary.
 - D. The City shall maintain and implement a Combined Sewer Overflow (“CSO”) Sewer Maintenance Manual that includes written procedures and/or schedules for the following:
 1. Routine and periodic maintenance of CSO outfall and diversion structures;
 2. Emergency response protocol;
 3. Dry Weather Overflow (“DWO”) reporting procedures; and
 4. Training and safety practices.
 - E. The City shall maintain a log of maintenance activities performed.
 - F. The City shall conduct Closed Circuit Television Inspections (“CCTV”) of at least 26 miles of the sewers in the CSS area annually. This will increase to 52 miles annually by year 2020.
 - G. The City shall clean a minimum of 106 miles of the sewers in the CSS area annually.
 - H. The City shall respond to all CSO and bypass reports.
 - I. The City shall maintain a 24-hour emergency number for citizens and businesses to report CSOs and bypasses.
- II. Maximization of Storage in the Collection System (NMC – 2)
 - A. In order to maximize storage in the CSS collection system, the City shall:
 1. Inspect all CSS diversion structures at least once per month;
 2. Modify diversion structures, as necessary;
 3. Reduce and/or eliminate inflows (consistent with the approved OCP);
 4. Encourage localized upstream detention;
 5. Upgrade and/or adjust pump operations at interceptor lift stations, as practicable; and
 6. Remove obstructions to flow.

III. Review and Modification of Pretreatment Requirements (NMC – 3)

- A. The City shall annually:
1. Maintain an inventory of non-domestic discharges to the CSS and update as necessary;
 2. Re-assess the impact of non-domestic discharges on CSOs as appropriate;
 3. Evaluate feasible and necessary modifications to the pretreatment program;
 4. Implement and enforce city-wide ordinances, as they relate to the City's pretreatment program, including but not limited to the Surcharge Program for High Strength Wastewater and the Oil and Grease Management Program; and
 5. Conduct education programs for non-domestic dischargers.

IV. Maximization of Flow to the POTW for Treatment (NMC – 4)

- A. The City has determined the capacity of the major interceptor(s) and pumping station(s) that deliver flows to the CSS Wastewater Treatment Plants (“WWTPs”). The City shall ensure that the full capacity is available by using the O&M program, as described in NMC – 2.
- B. The City shall analyze existing records to compare flows processed by the CSS WWTPs during wet weather events and dry periods and determine the relationships between performance and flow.
- C. The City shall determine whether any inoperative or unused treatment facilities within the POTW can be used to store or treat wet weather flows, and if so, utilize the storage or treatment as appropriate.
- D. The City shall maintain Wet Weather Operating Guidelines for the CSS WWTPs that describe procedures for grit removal, monitoring pumping levels, regulating incoming flows, and balancing process operations.

V. Elimination of CSOs During Dry Weather (NMC – 5)

- A. The City shall inspect all diversion structures located within the CSS to identify potential DWOs, at least once per month.
- B. The City shall correct the cause of a DWO as soon as practicable.
- C. The City shall follow its current NPDES permits for verbal and written notification to the NPDES permitting authority that a DWO has occurred.

VI. Control of Solids and Floatable Material in CSOs (NMC – 6)

- A. The City shall conduct street sweeping to prevent extraneous solids and floatables from entering the CSS. Street sweeping shall be conducted at least two times annually on all streets with curbs within the CSS area.
- B. The City shall repair and clean catch basins.
- C. The City shall enforce City ordinances related to construction site erosion control, as appropriate.

VII. Pollution Prevention Programs to Reduce Contaminants in CSOs (NMC – 7)

The City shall implement pollution prevention measures and programs including but not limited to street cleaning, public education programs, solid waste collection, and recycling.

VIII. Public Notification (NMC – 8)

A. The City shall inform the public of the location of CSO outfalls, the occurrences of CSOs, the possible health and environmental effects of CSOs, and the recreational or commercial activities (e.g. swimming) curtailed as a result of CSOs. The public notifications shall include the following, as appropriate:

1. Posting warnings at the affected use areas (i.e.. at all swimming locations) downstream of a CSO that have the potential to be affected by pollutants discharged from the CSOs;
2. Posting warnings at CSO Outfalls and as appropriate downstream public access points which are potentially affected by pollutants discharged from the CSOs;
3. Periodic notices by general circulation newspapers, local radio, and/or television; and
4. Telephone Hot-Line for interested citizen calls.

IX. Monitoring to Characterize CSO Impacts and the Efficacy of CSO Controls (NMC – 9)

The City shall conduct any additional activities necessary to characterize the CSS, including but not limited to collecting and documenting information on CSO occurrences and known water quality problems and incidents.