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December 16, 2019

Michael Kroeger, Director
Division of Enforcement
Department for Environmental Protection
300 Sower Blvd.
Frankfort, KY 40601

EPA – Enforcement and Compliance Assurance Division
Attn: Mary Jo Bragan
61 Forsyth Street SW
Atlanta, GA 30303

Chief, Environmental Enforcement Section
Environmental and Natural Resources Division
U.S. Department of Justice
Post Office Box 7611
Washington DC 20044-7611

Subject: Fox Harbor Inline Storage
Project Elimination
IOAP Project No. S_HC_HN_NB03_S_09A_A_A
DOJ Case No. 90-5-1-1-08254

Attention Chiefs and Director:

MSD is requesting approval of a proposed minor project modification to eliminate Fox Harbor Inline Storage project (IOAP Project No. S_HC_HN_NB03_S_09A_A_A). This request is part of the ongoing adaptive management review of the approved Integrated Overflow Abatement Plan (IOAP) dated May 2014.

2009 IOAP Project Description

The original Fox Harbor Inline Storage project consisted of constructing a total of approximately 330 LF of 24"-60" pipe upstream of Fox Harbor Pump Stations # 1 and #2 to provide inline storage.

2012 Project Modification

No changes were proposed in the 2012 IOAP Modification (approved in 2014). The project remained the same as the 2009 modification.

2019 Project Modification Request

The request involves eliminating the proposed project. The project has had no documented overflows during the monitoring period and modeling indicates that no project is needed.

Technical Justification

The original project, developed in 2009, was based on one overflow event that occurred in 2007 where MSD hauled sewage from both Fox Harbor Pump Stations #1 and #2 to prevent a potential overflow due to a power failure on the utility side. Records show that this was not due to capacity issues, and power reliability is not an issue for operating these pumps. Furthermore, as it was a hauling operation, it is possible that the operation may not have been necessary to prevent an actual overflow before power was restored. At the time of the calibration, no flow monitoring data was available at the site. Therefore, the model was calibrated conservatively to account for the potential of capacity issues at the stations. Since the original project was developed, MSD has monitored the pump station sites and no overflows have occurred since the single hauling operation in 2007.

Furthermore, pump station drawdown tests were performed at each station to determine the actual pumping capacities of each station. Pump runtimes were reviewed during dry weather and wet weather periods, and the

contributing area upstream of the pump stations was re-calibrated based upon the new data. Based on the revised calibration, the existing pump stations do not result in an overflow for up to a 10-year cloudburst event.

Because historical data upstream of the pump stations does not show any overflows for over 12 years, and because the modeled data does not result in overflows during a 2-, 5-, or 10-year cloudburst event, the proposed inline storage project is not necessary.

For your reference, a copy of the project fact sheet from the 2012 IOAP Modification, updated to reflect this request that the project be eliminated, is included as Attachment A.

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

If you have questions or need additional information, please contact me at (502) 540-6136.

Sincerely,



Angela L. Akridge, P.E.
Chief Engineer

cc: T. Parrot P. Purifoy

sbl. X:\Data\IOAP\2014 IOAP\2014 Modification\Mod Letters\2019 – Fox Harbor ILS

Attachments

Attachment A



Project Name Fox Harbor Inline Storage - ELIMINATED

Project Number S_HC_HN_NB03_S_09A_A_A

Modeled Area Hunting Creek North

Branch or SSO ID NB03

Project Type Inline Storage

Receiving Stream Harrods Creek

Project Description This alternative includes replacing two 8" (total 133 LF) pipes upstream and east of the Fox Harbor #2 LS with 24" and 60" pipes respectively. For Fox Harbor #1: Install (194 LF of 24" to 54") parallel storage pipes upstream of the lift station and lower the upstream invert of that pipe (which will require a new drop MH).

Reason for Overflow Pump station capacities

Design Parameters This solution is based on a 2.60 inch cloudburst rain event.

Project Constraints N/A

Estimated Capital Cost \$328,000

Weighted Benefit/Cost Ratio 87.5

Asset ID	SSO Start Date	Volume (Gal)
62769	NO DATA	NO DATA

ELIMINATED

Integrated Overflow Abatement Plan
Vol. 3 - Sanitary Sewer Discharge Plan
 Hunting Creek North Sewershed
 Solution ID # S_HC_HN_NB03_S_09A_A_A
 Fox Harbor Inline Storage - ELIMINATED

Preliminary - For Budget Development Only
Legend

- Documented SSO
- Suspected SSO
- Haul Operation
- Proposed Pump Station Solution
- Pump Station
- WWTP
- Proposed Pipe Solution
- Force Main
- Collector < 12"
- Interceptor => 12"
- Combined Sewer Pipe
- Proposed Off-line Storage
- Road
- Streams
- Floodway
- Small WWTP Service Area
- Large WWTP Service Area
- CSO Area
- Metro Parks

General representation of overflow abatement solutions are for preliminary planning purposes. Alignments and locations may be altered during design.

1 inch equals 200 feet
 Scalable when printed on 11" X 17" paper



Some boundaries are uniquely symbolized within the map.

Map Revision
 May 7, 2009

Aerial Date: 2006



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