



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

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NEXSEN PRUET, LLC
COLUMBIA

CERTIFIED MAIL 7012 1010 0001 8097 2683
RETURN RECEIPT REQUESTED

Mr. Joseph D. Jaco
Director
Utilities & Engineering City of Columbia
P.O. Box 147
Columbia, South Carolina 29217

Re: Review of Sewer Mapping Program
City of Columbia Consent Decree - Civil Action No.: 3:13-2429-TLW

Dear Mr. Jaco:

The U.S. Environmental Protection Agency Region 4 and the South Carolina Department of Health and Environmental Control have reviewed and hereby approves the Sewer Mapping Program for the City of Columbia (City) submitted July 28, 2014, pursuant to Paragraph 12.f of the subject Consent Decree above. This approval is granted with the following comment:

Section 2.2.2 of the Mapping Program states that the hydraulic model will be developed for large diameter (15 inches and greater) sewer pipes. However, Section 17.a. of the Consent Decree requires that the hydraulic model be capable, among other requirements, of: (i) accurately predicting the flow rate and hydraulic grade line of wastewater in Force Mains from Major Pump Stations and the Major Gravity Sewer Lines under any historical dry or wet weather condition; (ii) **accurately predicting the location and severity of SSOs from the WCTS** under any historical dry or wet weather condition. Note also that the Consent Decree defines Major Gravity Sewer Lines as including: (i) a Gravity Sewer Line that is 15 inches in diameter or larger; (ii) a Gravity Sewer Line that conveys wastewater from one pumping station service area to another pumping station service area; and (iii) **a Gravity Sewer Line that has caused or contributed to, or that Columbia knows or should know will likely cause or contribute to, capacity-related unpermitted overflows.**

Thus, depending on whether the City has information demonstrating that portions of the sewer system with smaller diameter pipe are not capacity-limited, developing a hydraulic model for larger diameter sewer pipes is not necessarily adequate. There is a risk that the City, in focusing its hydraulic model only on portions of the system with larger diameter pipe, will fail to identify capacity-limited portions of the system using pipe diameter less than 15 inches. Ultimately, the City will be responsible for any SSOs that occur, including those that may occur in portions of the system with pipe diameter less than 15 inches. For this reason, we strongly recommend that the City consider expanding the hydraulic model to encompass areas with smaller diameter pipe to ensure that all capacity-limited areas are identified.

We are available to discuss this issue further. Additionally, you may submit any information demonstrating that capacity-related SSOs are not occurring or likely to occur in areas with pipe smaller than 15 inches in diameter, to facilitate further discussion.

Please contact Mr. Richard Elliott at (404) 562-8691 or via email at elliott.richard@epa.gov, should you have any questions regarding this matter.

Sincerely,



Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
NPDES Permitting and Enforcement Branch

cc:

Mr. Paul Schwartz
U.S. Environmental Protection Agency, Region 4

Ms. Elizabeth A. Dieck
South Carolina Department of Health and Environmental Control

Mr. David Wilson
South Carolina Department of Health and Environmental Control

Joan Hartley, Esq. ✓
Nexsen Pruet Law Firm

Amy Gillespie, Esq.
U.S. Department of Justice