ANNUAL NOTICE
FOR COMBINED SEWER OVERFLOWS

PREPARED FOR:

CITY OF SANDUSKY WASTEWATER TREATMENT PLANT
PERMIT NO. 2PF0001
304 HARRISON STREET
SANDUSKY, OHIO 44870

MAY 1, 2019

OVERVIEW

EPA is issuing a final rule to establish public notification requirements for CSOs to the Great Lakes Basin. The rule implements Section 425, which requires the EPA to work with the affected States having publicly owned treatment works that discharge to the Great Lakes to create public notice requirements for a combined sewer overflow discharge to the Great Lakes.

The rule for Public Notification Requirements for Combined Sewer Overflows to the Great Lakes Basin was finalized by U.S. EPA on December 17, 2017, and published in the Federal Register on January 8, 2018. The Public Notification rule becomes effective February 7, 2018 with a Public Notification Plan to be developed and submitted to Ohio EPA on or prior to August 7, 2018. Implementation of the Public Notification Plan must begin on or prior to November 7, 2018.

This rule requires CSO permittees to provide public notification of CSO discharges and specifies the minimum content of such notification. The rule's requirements include signage at CSO discharge locations and potentially affected public access areas, methods of providing public notice of CSO discharges, initial and supplemental notice to potentially affected entities and to the public, and an annual notice. Additionally, the rule includes requirements for CSO permittees to develop a public notification plan that reflects community-specific details as to ow the permittee would implement the public notification requirements, after seeking and considering input from public health departments and other potentially affected public entities.

The public notification requirements in this rule are designed to alert the public and public health departments, and other potentially affected entities of CSO discharges in a more wide-spread and timely manner. The notification requirements which involve distribution of CSO related information (e.g., CSO discharge location, receiving waterbody, time started, time ended, and volume) to the public and affected local governmental agencies would enable potentially affected parties to take action that may help prevent serious health effects that may otherwise occur if they were to remain unaware of the occurrence of CSO discharges.

Starting February 7, 2019, by May 1 of each calendar year any permittees authorized to discharge a CSO to the Great Lakes Basin shall make available to the public an annual notice. The rule requires that the Annual Notice summarize the permittee's CSO discharges from its discharge points from the previous calendar year and the CSO permittee's plans for CSO controls.

What is a CSO?

A CSO is an acronym for Combined Sewer Overflow. Combined meaning that it is combination of storm water and sewage. CSO's were installed when the City initially laid all the sewer collection pipeline. Their sole purpose is to prevent flooding of streets and homes in times of heavy rainfall. They act as a pressure relief valve. As the collection system fills with rain water to the point where it is about to spill out onto the roadway, or backup into people's basements, these gates open and redirects the storm flow from the collection system to the Sandusky Bay, lowering the level enough in the collection system to prevent the flooding from occurring. The City of Sandusky has 14 of these CSO's strategically placed throughout the lakeshore (see CSO discharge points table page 4).

These CSO's serve a purpose, but do discharge sewage to the Sandusky Bay. It is a much diluted version of sewage, but, sewage none the less. The City has been working with the EPA on designing a long term plan to reduce the number of rain events to 4 per year. Currently the City averages around 30 rain events per year. The Wet Weather CSO Summary Data by Date table (page 5) shows all the rain events that occurred in 2018. This table shows the time the events started, the duration of each event, volume discharged in million gallons (MG), and the amount of rainfall per each event. Two sites, Mills and Ogontz, are the largest contributors and therefore are sampled monthly and tested for amount of solids and CBOD being discharged. To give some reference to what the numbers are saying, typical concentrations for a raw wastewater solids is 200 mg/l, and CBOD is 150 mg/l. Since expanding the wastewater treatment plants capacity to 48 million gallons per day (MGD), the City has been able to drastically reduce the length of time the gates open, and the volume that is being discharged. The problem is in the collection system, the storm water just cannot get to the wastewater plant fast enough to prevent the gates from opening. The long term plan addresses this issue, and others as well. The plan is shown in detail on the Implementation of the Long Term Control Plan table (page 8).

As described in the CSO Control Policy, which was published in the Federal Register on April 19, 1994, municipalities should immediately implement best available technology achievable (BAT) or best conventional pollutant control technology (BCT). At a minimum, BAT/BCT should include the nine minimum controls (NMC), which are determined on a best professional judgement (BPJ) basis by the NPDES permitting authority. The NMC are controls that can reduce CSO's and their effects on receiving water quality, do not require significant engineering studies or major construction, and can be implemented in a relatively short period. Implementation of the NMC was among the first steps the City of Sandusky put into action in response to EPA's CSO Control Policy.

The Nine Minimum Controls are as follows:

1. Proper operation and maintenance programs for the sewer system and CSO points.
2. Maximum use of the collection system for storage.
3. Review and modification of pretreatment programs to minimize CSO impacts.
4. Maximization of flow to POTW for treatment
5. Prohibition of dry weather overflows.
6. Control of solid and floatable materials in CSO discharges.
7. Required inspection, monitoring and reporting of CSO's
8. Pollution prevention to reduce CSO impacts.
9. Public notification for any areas affected by CSO's.

The Implementation table (page 7), shows the Nine Minimum Controls that are currently being used as part of the CSO Control Policy. By using these nine minimum controls as a preventative maintenance program, keeps the collection system free from blockages, assures the gates are working freely, thus resulting in zero dry weather events for the year 2018 (page 6).

The nature of the City of Sandusky Collection System divides CSO receiving waters into three areas. The Central portion of the downtown waterfront receives proportionately smaller volumes of discharge from several outfall locations. The Eastern waterfront (near Ogontz Street) receives a larger volume of discharge predominately from a single outfall. The Western waterfront area also receives a large volume of combined storm water and sewage from a single outfall at Mills Street.

The Central waterfront are has numerous facilities built in an around the CSO outfalls. Uses of the waterfront area include ferry docks, recreational boat mooring, park areas, industrial loading docks, restaurants, office space, and warehouses. The Eastern waterfront area includes recreational boat moorings, boat houses with attached residences, and a public canoe launch facility. The Western waterfront area includes a park area, recreational boat moorings, a boat repair yard, and a public boat launch facility. Any public access area potentially impacted by CSO discharges have warning signs posted, advising of the potential health hazard. The public can visit the City of Sandusky's website to check if there is, or has been, an ongoing rain event.

If there are any questions or comments regarding this annual report, or CSOs in general, contact the Director of Public Works with the City of Sandusky at (419) 627-5829.

CSO DISCHARGE POINTS

The following table contains the CSO discharge points along with a brief description of the location
There is no treatment provided for any of the discharge points.

Outfall Number	Description	Lattitude Degree	Longitude Degree	Receiving Water
004	Arthur St - West side of Son Rise Marina at shoreline	41.45414	-82.688109	Sandusky Bay
005	McEwen St. - By turn around at shoreline	41.454579	-82.692243	Sandusky Bay
006	Ogontz St. - At shoreline	41.455162	-82.693308	Sandusky Bay
007	Meigs St. - Between Sandusky Bay Pavilion and Battery Park Marina at shoreline	41.461610	-82.703606	Sandusky Bay
008	Warren St. - Between Shoreline Park and Yacht Club at shoreline	41.460131	-82.706668	Sandusky Bay
009	Jackson St. - Between Chesapeake Condos and Jackson Street Pier at shoreline	41.457690	-82.714665	Sandusky Bay
011	Hancock St. - Between New Sandusky Fish Company restaurant and Department of Natural Resources at shoreline	41.458923	-82.709481	Sandusky Bay
013	Decatur St. - West side of Chesapeake Condos at shoreline	41.458295	-82.716777	Sandusky Bay
014	Lawrence St. - Deep Water Marina at shoreline	41.456100	-82.719219	Sandusky Bay
015	McDonough St. - Inside gated area of the Geo. Gradel salt docks at shoreline	41.455994	-82.720977	Sandusky Bay
016	Shelby St. - Inside gated area of the Geo. Gradel salt docks at shoreline	41.455193	-82.722715	Sandusky Bay
017	Mills St. - West side of Amvets Club follow sidewalk to shoreline	41.451371	-82.727728	Sandusky Bay
019	Perkins Ave. - Along Pipe Creek east of St. Stephen's Church	41.432769	-82.683714	Pipe Creek / Sandusky Bay
021	Monroe St. - By Harbour Condos, behind unit #444 A & B on Bay Breeze Drive	41.448891	-82.739015	Sandusky Bay

WET WEATHER CSO SUMMARY DATA BY DATE

						Precipitation (Inches)					Monitoring Data (mg/l)			
											Mills (017)		Ogontz (006)	
Event Date	Approximate Start	Approximate End	Duration Hours	Volume MG	Cause	WWTP	Columbus Ave. Subway	Piertrack Lift Station	Police Station	SFD No. 7	CBOD	SS	CBOD	SS
12-Jan-18	1/12/2018 3:30	1/12/2018 19:30	16	9.482	Rain	n/a	1.05	0.91	1.01	0.95	30	57	42	226
22-Jan-18	1/22/2018 23:30	1/23/2018 1:00	1.5	0.495	Rain	n/a	0.41	0.46	0.37	0.53	n/a	n/a	n/a	n/a
21-Feb-18	2/21/2018 14:00	2/21/2018 14:30	0.5	0.01	Rain	0.36	0.43	0.38	0.41	0.41	n/a	n/a	n/a	n/a
25-Feb-18	2/25/2018 1:30	2/25/2018 2:00	0.5	0.068	Rain	0.36	0.34	0.31	0.33	0.37	n/a	n/a	n/a	n/a
1-Mar-18	3/1/2018 11:00	3/2/2018 18:00	31	122.02	Rain	1.95	1.99	1.36	1.29	1.98	33	128	26	116
29-Mar-18	3/29/2018 16:30	3/30/2018 0:30	8	1.36	Rain	1.08	1.01	0.91	0.79	1.06	n/a	n/a	n/a	n/a
14-Apr-18	4/14/2018 15:00	4/16/2018 4:30	37.5	22.361	Rain	1.71	1.54	1.04	1.04	1.87	n/a	n/a	n/a	n/a
3-May-18	5/3/2018 4:00	5/3/2018 8:00	4	2.196	Rain	0.96	0.98	0.96	0.94	0.94	38	356	17	163
10-May-18	5/10/2018 2:30	5/10/2018 3:00	0.5	0.131	Rain	0.21	0.33	0.28	0.28	0.13	n/a	n/a	n/a	n/a
13-May-18	5/13/2018 5:30	5/13/2018 13:00	7.5	4.148	Rain	0.84	0.8	0.77	0.76	0.84	n/a	n/a	n/a	n/a
14-May-18	5/14/2018 9:30	5/14/2018 16:30	7	1.313	Rain	0.43	0.51	0.55	0.41	0.46	n/a	n/a	n/a	n/a
22-May-18	5/22/2018 0:30	5/22/2018 2:00	1.5	0.041	Rain	0.35	0.37	0.35	0.29	0.42	n/a	n/a	n/a	n/a
26-May-18	5/26/2018 16:30	5/26/2018 19:00	2.5	1.494	Rain	0.31	0.46	0.47	0.44	0.23	n/a	n/a	n/a	n/a
3-Jun-18	6/3/2018 12:00	6/3/2018 14:00	2	1.266	Rain	0.46	0.25	0.17	0.56	0.45	n/a	n/a	n/a	n/a
10-Jun-18	6/10/2018 23:00	6/11/2018 2:00	3	1.193	Rain	1	0.88	n/a	0.51	0.88	22	170	12	38
12-Jun-18	6/12/2018 22:00	6/13/2018 2:30	4.5	1.758	Rain	0.64	0.48	n/a	0.7	0.74	n/a	n/a	n/a	n/a
19-Jun-18	6/19/2018 1:30	6/19/2018 2:00	0.5	0.333	Rain	0.36	0.35	0.31	0.19	0.51	n/a	n/a	n/a	n/a
23-Jun-18	6/23/2018 15:00	6/23/2018 17:30	2.5	0.767	Rain	0.58	0.52	0.48	0.82	0.6	n/a	n/a	n/a	n/a
5-Jul-18	7/5/2018 16:00	7/5/2018 19:00	3	1.534	Rain	0.4	0.78	0.86	0.54	0.4	n/a	n/a	n/a	n/a
26-Jul-18	7/26/2018 17:00	7/26/2018 17:30	0.5	0.28	Rain	n/a	0.45	0.35	0.37	0.3	n/a	n/a	n/a	n/a
6-Aug-18	8/6/2018 22:30	8/7/2018 18:30	20	3.52	Rain	1.09	2	0.47	1.47	1.75	13	78	38	54
17-Aug-18	8/17/2018 15:30	8/17/2018 23:30	8	7.793	Rain	1.88	1.84	n/a	1.99	1.62	n/a	n/a	n/a	n/a
21-Aug-18	8/21/2018 5:30	8/21/2018 18:00	12.5	0.24	Rain	0.92	0.79	0.17	0.74	1.1	n/a	n/a	n/a	n/a
26-Aug-18	8/26/2018 3:00	8/26/2018 12:30	9.5	12.216	Rain	1.46	1.6	1.69	1.29	1.35	n/a	n/a	n/a	n/a
10-Sep-18	9/10/2018 1:00	9/10/2018 3:30	2.5	0.19	Rain	n/a	0.83	0.74	0.73	1.13	n/a	n/a	n/a	n/a
6-Oct-18	10/6/2018 5:00	10/6/2018 22:30	17.5	0.496	Rain	0.91	0.82	1.12	0.98	n/a	36	226	12	57
28-Oct-18	10/28/2018 15:00	10/28/2018 16:00	1	0.33	Rain	0.63	0.6	0.64	0.61	0.69	n/a	n/a	n/a	n/a
1-Nov-18	11/1/2018 13:00	11/2/2018 18:00	29	38.781	Rain	2.59	2.37	2.14	1.44	2.98	31	58	27	94
21-Dec-18	12/21/2018 0:30	12/21/2018 8:00	7.5	2.308	Rain	1.04	1.05	1.02	0.89	1.02	28	116	33	77
31-Dec-18	12/31/2018 15:00	12/31/2018 22:00	7	2.133	Rain	0.9	0.85	0.84	0.79	0.94	n/a	n/a	n/a	n/a
TOTAL				**240.257**		**23.42**	**26.68**	**19.75**	**22.98**	**26.65**	**28.9**	**148.6**	**25.9**	**103.1**

DRY WEATHER CSO SUMMARY DATA BY DATE

Event Date	Approximate Start	Approximate End	Duration Hours	Volume MG	Cause

NO DRY WEATHER EVENTS IN 2018

IMPLEMENTATION

Measure	Control Addressed									Schedule
	1	2	3	4	5	6	7	8	9	
CSO facilities maintenance	X	X			X	X	X			Ongoing
Sewer Maintenance	X	X		X	X	X				Ongoing
Street Cleaning	X					X		X		Ongoing
Catch Basin Cleaning	X					X				Ongoing
Maintenance records	X									Ongoing
Safety	X									Ongoing
Training	X									Ongoing
Periodic review of O&M plans	X									Ongoing
Maximize flow to the interceptor		X		X						Ongoing with Modeling
Raise or install weir at critical CSO's		X		X						Ongoing
Initiate a program to identify and remove inflow sources		X		X						Ongoing
Perform flow monitoring throughout the system to locate areas of high I/I		X		X			X			Ongoing
Address lake inflow		X		X	X					Ongoing
Develop computer model		X					X			Ongoing
Identify chronic basement and street flooding areas		X								Ongoing
Raise or add overflow dams		X								Ongoing
Inlet controls		X								Ongoing
Employ storm mode operation				X						Ongoing
Evaluate wet weather capacities at the WWTP				X						Ongoing
Make modifications to maximize flow at WWTP				X						Ongoing
Utilize overflow detection devices	X				X		X			Ongoing
Adjust leaping weirs, dams, and orifice plates					X	X				Ongoing
Consider removing orifice plates						X				Ongoing
Record presence of solids and floatables on inspection and sampling forms	X					X	X			Ongoing
Note and log citizen complaints of solids and floatables						X			X	Ongoing
Increase source control in catchments tributary to										
polluting outfalls						X		X		Ongoing
Add baffles or trash buckets to catch basins						X				Ongoing
Public Reporting						X	X		X	Ongoing
NPDES Reporting					X		X			Ongoing
CSO Flow Monitoring and Sampling							X			Ongoing
Receiving Waer Sampling						X	X			Ongoing
Industrial pretreatment program			X					X		Ongoing
Public education program								X	X	Ongoing
Litter prevention program						X		X		Ongoing
Household hazardous waste and motor oil collection								X	X	Ongoing
Proper road de-icing program								X		Ongoing
Institute procedures for pollution prevention at municipal facilities								X		Ongoing
Post signs at CSO outfalls					X	X	X		X	Ongoing
Hotline					X	X			X	Ongoing

IMPLEMENTATION OF THE LONG TERM CONTROL PLAN

Identification Of Condition	Outfall Number	Description of Project	Final Completed/ Compliance Date
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 1	001	East End Sewer Improvements. Shall complete constructio of approved PTI 1037301.	3/3/2017 Completed
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 1	001	WWTP Grit Facility Improvement. Shall complete construction of approved PTI 1044973.	8/11/2017 Completed
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 1	001	Farwell Pump Station Upgrade. Shall complete constructio of approved PTI application and detail plans.	12/1/2020
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 1	001	Pier Track Pump Station Upgrade. Shall complete construction of approved PTI application and detail plans	12/1/2020
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 1	001	Mills Street 16.0 MGD HRT Facility. Shall complete construction of approved PtI application and detail plans.	12/1/2024
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 1	001	Programmatic Review. Permittee sall submit results of their Progammatic Review of the General Plan, Phase 1, of the Combined Sewer Overflow Long Term Control Plan. If the results indicate additional steps needed General Plan Phase 2, shall be initiated	12/1/2026
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 2	001	Third Street Pump Station/Cross-Town Force Main. Shall complete construction of approved PTI applicatio and detail plans. IF NEEDED	12/1/2030
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 2	001	Mills Street additional 8.0 MGD HRT Facility. Shall complete construction of approved PTI application an detail plans. IF NEEDED	12/1/2031
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 2	001	East Side 6.0 MG Storage Pipeline. Shall complete construction of approved PTI application and detail plans IF NEEDED	12/1/2033
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 2	001	Mills Street 4.1 MG Storage Basin. Shall complete construction of approved PTI application and detail plans IF NEEDED	12/1/2035
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 2	001	Pipe Creek 0.75 MG Storage Basin. Shall complete construction of approved PTI application and detail plans IF NEEDED	12/1/2035
Combined Sewer Overflow Long Term Control Plan - General Plan, Phase 2	001	Long Term Control Plan Effectiveness Report. If General Plan, Phase 2 is initiated, the permittee shall submit a report of their post construction monitoring and the report shall state whether the General Plan has achieved the goal of four CSO's or less per typical year. IF NEEDED	12/1/2037

The programmatic review scheduled for no later than 12/1/2026 will indicate if additional steps need to be taken to achieve the goal of four CSOs or less per typical year. If this goal is not achieved, General Plan, Phase 2, shall be initiated. By no later than 12/1/2037, the City of Sandusky shall submit a report which will state whether the General Plan has achieved the goal of four CSOs or less per typical year.