



John R. Kasich, Governor  
Mary Taylor, Lt. Governor  
Scott J. Nally, Director

August 7, 2013

Re: Lucas County  
City of Toledo  
Community Water System  
PWS ID#: OH4801411  
STU ID#: 4855847

Mr. David E. Welch, Director  
Department of Public Utilities  
City of Toledo  
420 Madison Avenue, Suite 100  
Toledo, Ohio 43604

Dear Mr. Welch:

I have reviewed your letter of July 15, 2013 requesting additional time to correct the significant deficiency in the alum feed system at the Collins Park Water Treatment Plant, as identified in the August 2012 sanitary survey. The November 6, 2012 sanitary survey letter stated that the amount of on-site alum storage was inadequate and that a redundant feed system was required. The need to have additional alum storage and a backup alum feeder in place by December 31, 2013, in order to be able to meet the winter treatment challenges that occur in January and February, was further discussed during a March 2012 meeting. Given the criticality of this treatment and the high demand in the winter for alum, I am not granting an extension of the deadline. Failure to meet the December 31, 2013 date will result in a violation of Ohio Administrative Code Rule 3745-81-60.

While having a secondary supplier is necessary to help ensure the city is able to meet its alum demand if delivery from the primary supplier is unavailable. It does not address the underlying issue of having enough chemical on hand or having a backup alum feeder.

The Ohio EPA has been patient and flexible in establishing schedules for addressing significant deficiency and other needed upgrades and repairs. While I commend the City for making significant progress in raising rates and procuring funding to address concerns at the treatment plant, the actual organization and commencement of projects is lacking. The replacement of the roof is a primary example.

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Ohio EPA has repeatedly emphasized 20 years is too long for addressing deficiencies and has requested a General Plan that would assess alternatives, describe a plan of action, and provide a schedule for addressing all identified areas of concern. In particular, a five to seven year time line for the 40 MGD plant does not reflect the urgency needed for bringing this necessary treatment upgrade online. The current level of action by the City does not reflect the urgency of needed repairs.

A long term plan of action must be put in place and followed by the City. The plan needs to identify and prioritize actions that need to be taken, in accordance with a schedule accepted by me.

Sincerely,



Scott J. Nally, Director  
Ohio EPA

cc: Michael G. Baker, Chief, DDAGW  
Stephen J. Herwat, Deputy Mayor, Operations, City of Toledo  
David E. Leffler, Commissioner, Water Treatment, City of Toledo  
Andrew P. McClure, Plant Administrator, City of Toledo

ec: Ellen Gerber, Northwest District Office  
Beth Messer, Central Office  
Susan Schell, Central Office