



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

December 2, 2013

Re: Lucas County
City of Toledo
Community Water System
PWSID: OH4801411

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

Dear Mr. Welch:

I am writing as a follow-up to our November 19, 2013 phone conversation. During that call, we decided to cancel our scheduled November 21, 2013 meeting due to the pending change in administration. We agreed a meeting very early in the new administration, along with the soon-to-be-hired project management firm, would be more beneficial. This meeting is critical to gaining a common understanding of short and long term project planning needs as well as the overall general planning process for the City of Toledo's public water system.

Ohio EPA commends the City for taking steps to address projects at the water treatment plant which are critical to ensuring the City's customers have access to adequate quantities of safe drinking water. However, the City faces significant challenges in completing a large number of high priority projects at the same time. These projects include, but are not limited to: chlorination facilities, alum feeder and alum storage facilities, roof replacement, low service pump station upgrades, SCADA system improvements, the plant power project, the 40 million gallon plant expansion and others.

Ohio EPA needs to gain a better understanding of the full scope and timing of these projects. While we have agreed to deadlines for completing most of these requirements, we do not have detailed documentation or timelines that allow us to gage progress on all of them. A specific objective of the planned November 21, 2013 meeting was to discuss progress on the additional alum storage and feed facilities and your request for an extension of the deadline for completion of this project. A lack of project planning and management documentation has made it difficult for us to judge the adequacy of progress on the project in order to determine if an extension is justified. Information obtained from staff during monthly phone calls indicate further delays of this project are occurring. A principle objective of the requested meeting is to discuss how the City is planning, documenting and managing timely completion of all these critical projects to avoid future delays. I commend the City for contracting with a consulting firm to help manage and oversee implementation of these projects. Our experience working with other cities on large scale projects indicates this professional assistance is essential.

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Another objective for the meeting is to discuss the City's plans for addressing other critical deficiencies as well as the City's longer term plans for evaluating and addressing the water system's infrastructure 20 years and beyond. As we discussed on the phone, there is work to be completed beyond the current scope of projects. There are critical deficiencies identified in the City's October 2011 draft Twenty Year Master Plan and Needs Assessment Report, as discussed in an a November 6, 2012 letter from me to you, that have not been addressed. There are other items that must be evaluated in the very near future, as planning of other projects rely on them. This includes an evaluation of the structural integrity of all plant components. Understanding the full scope of plant deficiencies is essential to planning the most effective solution for long term water system design. Another critical deficiency which will need to be addressed is the City's lack of elevated finished water storage. The lack of elevated storage in the distribution system is unique among Ohio cities and creates a significant risk of pressure loss events and eliminates flexibility in plant operations. The City should begin planning and moving towards a distribution system which provides additional elevated storage.

Finally, we would like to discuss the City's overall planning process for undertaking necessary substantial capital improvements. The City has continued to contend that an overall general plan is not needed. This approach is atypical and does not comport with established strategies for determining the most cost-effective approach to meeting infrastructure needs. A general plan evaluates all alternatives and describes the best long-term cost-effective approach for meeting the drinking water needs of the City now and in the future.

The City of Toledo faces significant challenges in making the repairs and upgrades to its public water system necessary to ensure a reliable and safe source of drinking water. Many of these needed projects have been deferred for decades and are necessary to meet regulatory requirements. The City of Toledo is commended for taking the initial steps to address many of these deficiencies. A common understanding of the short and long term project planning and the full scope of work to be accomplished is necessary to ensure effective communication and continuation of the cooperative working relationship the City and Ohio EPA have strived to maintain. We are looking forward to meeting with the new administration, as well as the consulting firm contracted to oversee the short term planning projects, as soon as possible.

Sincerely,



Michael G. Baker, Chief
Division of Drinking and Ground Waters

cc: Scott Nally, Director, Ohio EPA
~~Beth Messer, Assistant Chief, DDAGW~~
Shannon Nabors, Chief, Ohio EPA NEDO
Ellen Gerber, NWDO, DDAGW
David Leffler, Commissioner, Water Treatment, City of Toledo
Andrew McClure, Plant Administrator, City of Toledo