



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

March 31, 2014

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

Mr. Robert Reinbolt and Ms. Robin Whitney, P.E.
City of Toledo
420 Madison Avenue
Toledo, Ohio 43604

Dear Mr. Reinbolt and Ms. Whitney:

It was a pleasure to meet with you, your staff and consultants to discuss the City of Toledo's public water system infrastructure projects and future planning. I believe our meeting was constructive and provides a good framework to implement a plan moving forward.

TIME CRITICAL INFRASTRUCTURE REPAIRS AND UPGRADES

Working with you to better understand the City's priorities and plans for addressing what we see as critical repairs and upgrades is extremely important. As we discussed, the Agency believes the Collins Park Water Treatment Plant is vulnerable to potential failures that could severely impact the City's ability to provide adequate quantities of safe water to the community. We emphasized the need to accelerate your purchasing process and complete these projects with the same urgency that would be necessitated were a failure to actually occur. We plan to include this priority item on the agenda of our regularly scheduled meetings, as described below, to keep abreast of the City's progress in addressing these repairs and upgrades.

EMERGENCY PLANNING

Another priority item is the development of a more robust emergency plan, given the condition of the infrastructure and the amplified risk of failure during the construction of projects. We would like to schedule a meeting with you, along with state and local emergency management agencies, to discuss potential disruptions of service and what resources are available to mitigate impacts of those disruptions. I will be reaching out to you to discuss scheduling this meeting in coordination with appropriate state and local EMA contacts.

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BASINS 7 AND 8 DESIGN

Thank you for providing us a copy of the City's Request for Proposal for Basins 7 & 8 (RFP). The RFP addressed a number of concerns raised during our meeting and we appreciate that it calls for a general plan with some evaluation of alternatives. Ohio EPA continues to believe it is in the City's best interest to evaluate all alternatives for potential rehabilitation of the existing facilities (if the structural evaluation determines it is practical) as well as the 40 MGD of additional treatment capacity before making the final decision on the master design of the treatment plant. We believe the City has a great opportunity to evaluate updated technologies that have been developed since the original design of the plant. In addition, given new regulatory requirements and source water quality challenges, the City faces different treatment objectives than the plant was originally designed to achieve (i.e. harmful algal blooms, disinfection byproducts, *Cryptosporidium* removal requirements, and stricter pathogen removal and inactivation requirements).

We discussed the need for the City to evaluate water treatment plant capacity under Ohio EPA's Approved Capacity document as part of your future submittal of engineering plans for Basins 7 & 8. The purpose of this evaluation is to ensure a public water system is prepared to provide adequate quantities of finished water to meet its customers' existing and future water demands. A firm understanding of the capacities of each of the treatment components will provide the City with the knowledge needed to determine how much water can reliably be treated by a given process (meaning design criteria not exceeded) and which process is the limiting factor regarding capacity. The Approved Capacity document can be found at: <http://www.epa.state.oh.us/portals/28/documents/engineering/ApprovedCapacity.pdf>.

LONG-TERM PLANNING

Furthermore, we encourage you to undertake more long-term planning on how best to meet the water infrastructure needs of Toledo residents and the surrounding communities into the future. We also discussed the long-term reliability and flexibility which could be provided to the City of Toledo by providing elevated storage throughout the distribution system. While the City has other more immediate projects in the planning and construction phases, it would benefit the City to include elevated storage in your future planning for the distribution system.

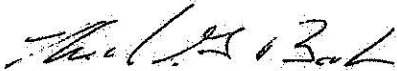
Finally, timely and on-going communication between Ohio EPA and the City is essential to establish priorities for the variety of projects necessary to address critical short-term and long-term needs.

To this end, we look forward to receiving updated Gantt charts, with specific milestones for all currently-identified projects by April 11, 2014. Detailed schedules will help establish shared expectations and serve as a communication tool to track and assess progress. We will use the Gantt charts and status reports from URS to drive the scheduling of future conference calls and face-to-face meetings. In addition, the routine URS written status reports you are sharing with us will be helpful to understand your progress moving forward.

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Again, I want to thank you for meeting with us and we look forward to receiving the above requested information as we work together in this process. Please do not hesitate to call me at 614-644-2752 with any questions.

Sincerely,



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

- cc: Chase Eikenbary, Governor's Office
Joel Mazur, Assistant Chief of Staff, City of Toledo
Dave Leffler, Water Commissioner, City of Toledo
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