



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

June 9, 2014

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

The Honorable D. Michael Collins, Mayor  
City of Toledo  
420 Madison Avenue  
Toledo, Ohio 43604

Dear Mayor Collins:

I am writing to make you aware of concerns I have about the lack of progress being made to address needed improvements at the City of Toledo's public water system. The City's public water system, and in particular 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 its citizens. Through ongoing correspondence, meetings and conference calls with City officials over the last two years, my staff and I have remained hopeful that the City would expeditiously address these concerns. And, while the City has indicated they are working toward this end, Ohio EPA is not yet convinced that adequate progress is being made.

#### Detailed Timelines and Scope of Work

The City of Toledo continues to be in violation of OAC Rule 3745-81-60(E) by failing to correct the sedimentation vent and alum system significant deficiencies as outlined in the February 6, 2014 notice of violation. The City also does not appear to be on a path to timely comply with the deadlines for the remaining significant deficiencies identified in the June 10, 2013, letter. Specifically, Ohio EPA has not received the requested detailed Gantt charts for each project, nor the detailed list of improvements which will be accomplished with each project in the City's Capital Improvement Program as requested in the March 3, 2014 meeting and outlined in the attached March 31, 2014 letter. I have also attached the list of issues discussed at the March 2014 meeting with annotations from staff on issues still needing a response.

#### Emergency Planning

It is my understanding that meetings we recommended with state and local emergency management agencies are occurring and a tabletop exercise is being planned for November, 2014. I am very pleased these conversations are ongoing; however, in the interim the City's emergency plan should be revised to address a major plant or source failure such that drinking water could not be produced for an extended period of time.

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### Long Term Planning

Ohio EPA continues to emphasize the need for long term planning on how best to meet the water infrastructure needs of Toledo and surrounding communities into the future. This general plan should evaluate the potential benefits of adding elevated storage to the City's distribution system.

### Requested Response

Please provide the following by June 16, 2014:

- A detailed list of improvements to be made with each project listed in the City's Capital Improvements Program;
- Revised detailed Gantt charts with specific milestones;
- A response to the remaining questions from the document "*Ohio EPA Comments on Capital Improvement Program, February 2014*" which was handed out and discussed at the meeting on March 3, 2014; and
- A revised contingency plan.

I cannot underscore boldly enough the precarious condition of Toledo's drinking water system and the imminent vulnerability to failure. If the City cannot provide an acceptable schedule with detailed milestones by June 16, 2014, I will propose a schedule that assures the City can reliably provide safe supplies of water as expeditiously as possible as well as a schedule for long term planning.

I look forward to receiving the requested information as we work together for a mutually acceptable resolution. If you have questions, please contact Michael Baker, Chief of the Division of Drinking and Ground Waters, at (614) 644-2752.

Sincerely,



Craig W. Butler  
Director

Enclosures

cc: David Leffler, City of Toledo  
Robert Reinbolt, Chief of Staff, City of Toledo  
Shannon Nabors, District Chief, NWDO  
Michael G. Baker, Chief, DDAGW – CO  
Beth Messer, Assistant Chief, CO  
Ellen Gerber, Unit Supervisor, NWDO