

April 17, 2013

USEPA Region 5 Comments on MWRD Sewer Permit Ordinance language

In order to assess excess flow, one must measure flow. Overall USEPA believes that in order to properly assess excess Inflow and Infiltration flow into MWRD's sewer system there should be a flow measurement component, which includes consideration of flow monitoring/metering at a minimum; and may also include a flow rate target as a maximum. This premise has been historically established within the MWRD's sewer system documents and practically applied by MWRD and its Satellite communities.

It is also worth noting that Federal CMOM Guidance's fourth (of the five) program elements is identified as SEWER SYSTEM CAPACITY EVALUATION, and includes the following elements under this program heading: testing; inspection; and flow monitoring.

The Sewer Summit Agreement, September 1985 between MWRDGC and the Tributary (currently known as Satellite) Communities, on page 1, included in its general scope statement that:

1. All parties agree that removal of I/I from sanitary sewers is consistent with an effective regional program for control of water pollution and sewage backup in the MWRD service area.
2. This corrective action must be undertaken in a manner which addresses federal, state and local concerns.
3. And on page 5, establishes an ICAP Technical Panel whom were charged with the following duties:
  - a. Develop, by March 1, 1986, recommendations regarding the components used to compute transport and treatment costs.
  - b. Review and comment upon by March 1, 1986, flow metering criteria used to evaluate I/I.

The ICAP Technical Panel formed by the District in 1986 per Article 6-5.i.2 of the Manual of Procedures for the Administration of the Sewer Permit Ordinance developed the flow monitoring requirements of the ICAP program. Those requirements are contained in the following referenced documents; "Instructions to Municipalities and Agencies Regarding New Procedures to Complete Sanitary Sewer Rehabilitation" dated March 1986 (see page 11) and in the "Instructions for Submitting Sewer System Evaluation Reports and Report Review Criteria" dated December 5, 1986 (see page 10 & 11). Since the ICAP program was based upon cost effective removal of I/I, flow measurement was a significant part of that program.

USEPA submitted the attached comments to MWRD on March 25, 2013 for consideration in the development of language for Article 6-5, Correction of Existing Deficiencies in Separate Sewered Areas, of the Manual of Procedures for the Administration of the Sewer Permit Ordinance.