UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

FEB 16 2017

CERTIFIED MAIL 7016 1970 0000 8992 6564
RETURN RECEIPT REQUESTED

Mr. Joseph D. Jaco
Director, Utilities & Engineering
City of Columbia
P.O. Box 147
Columbia, South Carolina 29217

Re: Review of Infrastructure Rehabilitation Program
City of Columbia Consent Decree
Civil Action No.: 3:13-2429-TLW

Dear Mr. Jaco:

The U.S. Environmental Protection Agency Region 4 and the South Carolina Department of Health and Environmental Control (DHEC) are in receipt of the Infrastructure Rehabilitation Program for the City of Columbia (City) submitted November 29, 2016, pursuant to Paragraph 16.a of the subject Consent Decree (CD) above. A review of this submittal resulted in the following comments and/or questions:

Section 2.1.2 of the Infrastructure Rehabilitation Program report defines 'Criticality Rating' as a numerical value assign to a sewer line or manhole with low values assigned to represent a low consequence of failure and a high values assigned to represent a high consequence of failure. Section 2.1.3 subsequently utilized this rating in a prioritization matrix (Figure 2-1) that demonstrates that assets with a high Criticality Rating, and therefore a high consequence of failure will not be rehabilitated. Instead, the assessment of these assets is left to be conducted in the CSAP program as dictated by the attendant CSAP schedule. It is the EPA's view that any asset that is deemed to have a high consequence of failure must be given priority in assessment and rehabilitation.

Section 5.1 of the Infrastructure Rehabilitation Program states that "in the event a constructed project does not reduce the occurrence of SSOs, the inspection data will be reassessed and the assumed cause of the SSOs will be reevaluated using professional judgment." The EPA sees this as an incomplete or inaccurate statement as it does not explicitly state that another project will be developed and implemented to eliminate the SSOs within the given CD timeframe. As a reminder, the City is fully liable for violations of the Clean Water Act should such a situation present itself regardless of the expenditure undertaken to construct the failed project.

Section 5.2 of the Infrastructure Rehabilitation Program outlines the City's focus on reduction of I/I. While a laudable and important goal, successful implementation of any project by the City is measured by the number of SSOs eliminated and only secondarily by the amount of I/I removed. SSO elimination should be used as the controlling criterion for analyzing project effectiveness. The significance of I/I reduction is derived from its relationship to eliminating and/or reducing SSOs.

The EPA and DHEC will give final approval of the Infrastructure Rehabilitation Program pending satisfactory answers to the above comments. The City should provide an updated Infrastructure Rehabilitation Program report within thirty (30) days of receipt of this letter. Should you have any questions regarding this matter, please contact Mr. Richard Elliott, at (404) 562-8691 or via email at elliott.richard@epa.gov.

Sincerely,

Maurice L. Horsey, IV, Chief
Municipal & Industrial Enforcement Section
NPDES Permitting and Enforcement Branch

cc: Mr. Paul Schwartz
U.S. EPA, Region 4

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