



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

02 DEC 2016

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Article No.: 7014 1200 0000 6126 0662

Mr. Brian Hoelscher
Metropolitan St. Louis Sewer District
2350 Market Street
St. Louis, Missouri 63103-2555

RE: Approval Modification of Capacity, Management, Operations and Maintenance (CMOM)
Program Plan submitted pursuant to Consent Decree no.4:07-CV-1120

Dear Mr. Hoelscher:

The U.S. Environmental Protection Agency has reviewed the proposed modifications to the Sewer Line Cleaning Performance Standards contained in the CMOM Plan submitted by the Metropolitan St. Louis Sewer District on November 9, 2016. The EPA is accepting the revisions to the plan in accordance with Paragraph V.G.33 of the Consent Decree.

The modifications to the line cleaning performance standards will be based on the condition rating given during the time of acoustic inspection for the pipe less than 15" in diameter in the Separate System. The previous standard was a fixed annual requirement to clean Non-PCV pipe less than 21" every five years and PVC pipe less than 21" every 10 years. In the Separate System, MSD will use acoustic inspections of PVC and Non-PVC pipe less than 15" every six years to determine if cleaning is necessary. All pipe rated 0 to 5 based on the acoustic inspection will be cleaned. In the Separate System, MSD will also clean PVC and Non-PVC pipe greater than 15" and less than 21" every six years. In the Combined System, MSD will clean PCV and Non-PVC pipe less than 21" every five years. This change to the Performance Standards will ensure the collection system is cleaned in a cost effective manner.

If you have any questions, please contact me at 913-551-7782, or Jodi Bruno of my staff at 913-551-7810, or at Bruno.jodi@epa.gov.

Sincerely,

A handwritten signature in cursive script that reads "Karen A. Flournoy".

Karen A. Flournoy
Director
Water, Wetlands and Pesticides Division



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(Sent via hard copy):

Chief, Environmental Enforcement Section
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Re: DOJ No. 90-5-1-1-08111

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