

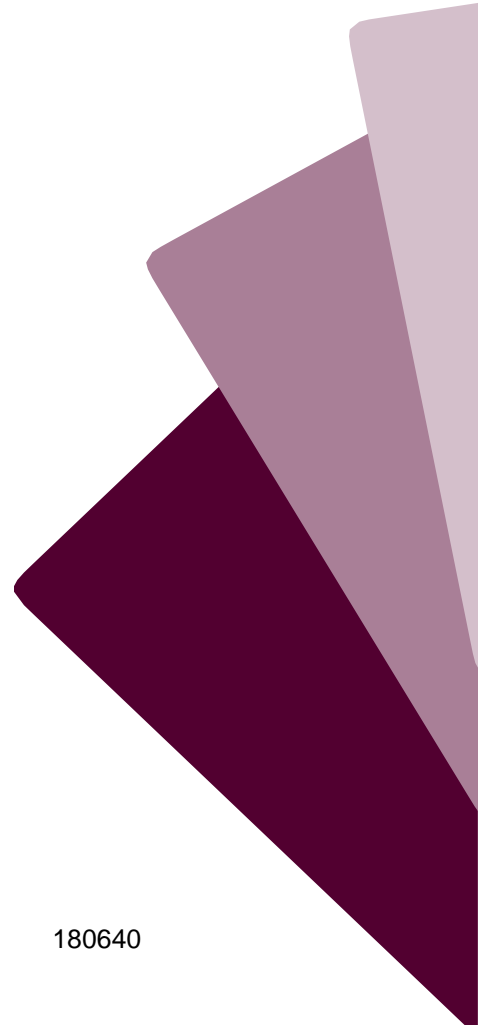


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Combined Sewer Overflow (CSO) Public Notification Plan

PREPARED FOR
City of Elyria, Ohio

August 20, 2018



Goal of the CSO Public Notification Plan

To develop a notification plan that describes how the City of Elyria will ensure that the public receives adequate notification of combined sewer overflows (CSO) occurrences and impacts. This plan helps to protect public health by ensuring timely notice to the public of CSO discharges. The information in this plan is also intended to help the community understand the current performance of the Elyria collection system. CSO Public Notification Plan requirements are shown below in **bold text**.

Section 1: Identify the location of discharge points and the signs that accompany them.

A map showing the City of Elyria's 27 combined sewer overflows (orange dots) and the locations of all CSO signage (black squares) is included in Appendix A. Additionally, Appendix A includes tables showing signage locations and the NPDES permit numbers of the CSO outfalls upstream of the sign locations.

In 1998, to fulfill the public notification requirements of the CSO Nine Minimum Controls, the City posted CSO warning signs at the CSO outfalls on the east branch of the Black River as well as at the one outfall in Cascade Park. During rain events the height of the river rises, many times from as low as 0.5 feet to greater than flood stage of 9.8 feet, as measured at the USGS gauge located in Cascade Park. The signs on the east branch of the river were quickly destroyed by large trees floating down the river during the heavier rain events, while the sign in Cascade Park remained. It was determined that in order to post signs high enough to keep them out of the way of the floating trees, the signs would have to be placed in resident's back yards. This applies to all of the outfalls on the east branch of the river in the vicinity of East Avenue. There are no public access points on this stretch of the river. As part of this CSO Public Notification Plan, the City will be posting signs where Wolf Court, Brooklyn Street, Elizabeth Street, Riverdale Court and Smith Court dead-end at the river. All of these streets are on the east branch of the river. The properties beyond the dead-ends are private property. As such, the signs will be posted on the guard rails at the dead-ends of these streets. The east branch is not accessible except at the bridges over the river (not public access points), which is where the CSO warning signs will be posted. Notification information will also be mailed out to the residents on East Avenue annually to keep them aware of the combined sewer overflows in that area.

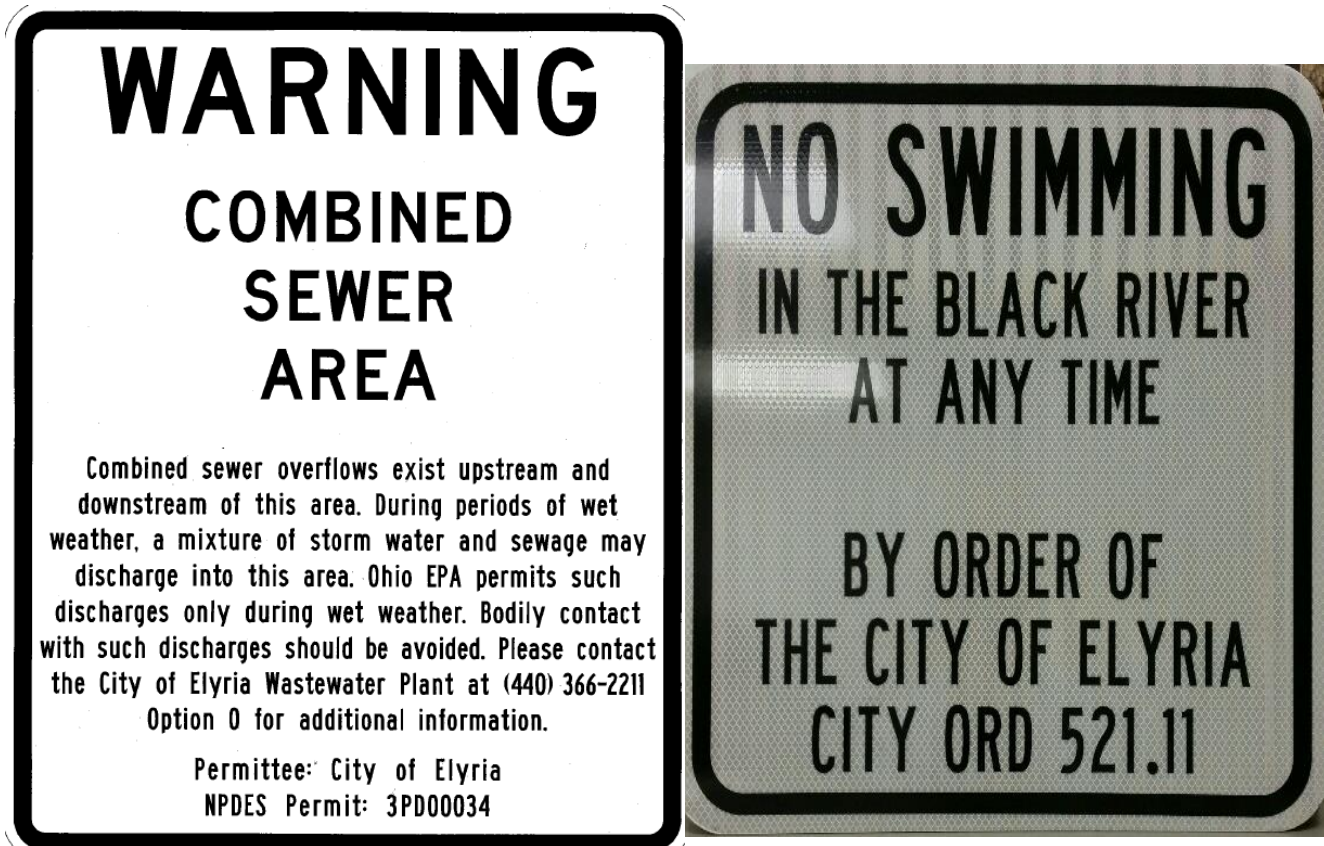
The west branch of the river is not accessible, except for the area in the vicinity of 11th Street off of Riverside Drive. Two signs will be posted at the river, one near 11th Street and one near 12th Street, where nearby residents could possibly walk down to the river. This is not a public access area to the river and there are no CSO outfalls upstream of this area. The only other accessible areas on the west branch are at the bridges over the river (not public access points), which is where the CSO warning signs will be posted. The remainder of the west branch is inaccessible due to elevation.

The areas of concern, where residents can get access to the river on the main stem of the river downstream of the confluence at Cascade Park, include Cascade Park, Elywood Park and Bur

Oak Park. The CSO warning signs will be posted in several locations in Cascade Park, in Elywood Park at the ford (only access point to the river in this park) and also at the canoe and kayak launch in Bur Oak Park. The Lorain County Metro Parks just re-opened Cascade Park following a complete renovation of the entire park. During the renovation, the only CSO outfall in the park was made accessible to the public and, as such, will have an outfall-specific CSO warning sign posted at the outfall.

The City of Elyria has an ordinance prohibiting swimming in the Black River within the corporation limits of the city (Ord. 521.11) and the Lorain County Metro Parks has laws prohibiting swimming in the river in the parks under their jurisdiction. A sign with the 521.11 ordinance language will be posted on the same sign posts as the CSO warning signs. A photo of the 521.11 ordinance sign is included in this plan.

Below is an image of the text on the CSO signs as well as documentation that no swimming is permitted in the Black River:



Section 2: Describe the message used on signs.

The message on the signs contains the following information:

- Description of discharge and risk of exposure
- Notice stating that sewage may be present in the water
- City's contact information
- Name of permittee
- Permittee's NPDES permit number

Bridges and parks are the human access points to the river and therefore Elyria is placing signs at river bridges throughout the community. Signs will also be strategically posted in Elywood, Bur Oak, and Cascade Parks. The majority of the signs will be mounted on sign posts cemented into the ground. There may be a few signs that will be permanently mounted on chain-link fencing that is there to prevent anyone from accessing the river.

Placing signs at the actual outfall pipe is often impractical for several reasons:

- 1) locations are not accessible to the public;
- 2) locations are on private property;
- 3) heavy woody debris damage signs;
- 4) steep, overgrown drop-offs 20-40 feet down to river from outfall; and
- 5) overflows to another combined sewer, not to the river

For these reasons, Elyria is placing signs on the bridges just downstream of the outfalls and in the parks as they will be better seen by the public.

Table 1 lists each outfall, it's location, and the accompanying reason a sign at the actual outfall is impractical.

The only outfall to have a sign posted right at the outfall pipe is #3PD0034013 located in Cascade Park. Due to recent renovations at the park that outfall is now accessible to the public.

Sampling Station	ID	Location Description	Receiving Waterbody	Outfall Sign Impractical Due To
3PD00034006	102	Columbus St. @ St. Claire St.	E. Br. Black River	1, 4
3PD00034007	103	Washington Ave. N of bridge	E. Br. Black River	1, 4
3PD00034008	104	Washington Ave. @ Depot St.	E. Br. Black River	1, 4
3PD00034011	120	Dewey Ave. @ Lorain Blvd.	Black River	1, 2, 4
3PD00034012	121	Bond St. @ Jefferson Alley	Black River	1, 2, 4
3PD00034015	133	Lake Ave. @ Tremont St.	E. Br. Black River	1, 4
3PD00034016	142	Fourth St. @ West Ave.	W. Br. Black River	1, 2
3PD00034018	145	West Ave. @ Elyria H.S.	W. Br. Black River	1, 2
3PD00034019	146	West Ave. @ Ninth St.	W. Br. Black River	1, 2
3PD00034020	150	East Ave. @ Fourth St.	E. Br. Black River	1, 2, 3
3PD00034021	152	Fifth St. @ East Ave.	E. Br. Black River	1, 2, 3
3PD00034022	153	East Ave. @ Sixth St.	E. Br. Black River	1, 2, 3
3PD00034025	158	Ninth St. @ East Ave.	E. Br. Black River	1, 2, 3

Sampling Station	ID	Location Description	Receiving Waterbody	Outfall Sign Impractical Due To
3PD00034026	159	Gates Ave. @ East Ave.	E. Br. Black River	1, 2, 3
3PD00034027	160	Howe St. @ East Ave.	E. Br. Black River	1, 2, 3
3PD00034028	161	East Ave. @ George St.	E. Br. Black River	1, 2, 3
3PD00034029	162	230 Wooster St.	E. Br. Black River	1, 2, 3
3PD00034030	163	Wooster St. @ East Ave.	E. Br. Black River	1, 2, 3
3PD00034031	164	1241 East Ave.	E. Br. Black River	1, 2, 3
3PD00034032	170	East Ave. @ Depot St.	E. Br. Black River	1, 4
3PD00034034	172	Holly Lane @ East Ave.	Combined Sewer	5
3PD00034035	180	Third St. @ Chestnut St.	W. Br. Black River	1, 4
3PD00034036	181	Second St. @ Water St.	Combined Sewer	5
3PD00034037	182	Broad St. @ Water St.	W. Br. Black River	1, 2, 4
3PD00034038	191	Buckeye St. @ East River St.	E. Br. Black River	1, 4
3PD00034044	151	East Ave. 4 th St. Siphon Chamber	E. Br. Black River	1, 4

Table 1. List of outfalls, locations, and why a sign at the exact outfall location is impractical. The final column’s number corresponds to the reason(s) for why a sign at the actual outfall is impractical: 1) locations are not accessible to the public; 2) locations are on private property; 3) heavy woody debris damage signs; 4) steep, overgrown drop-offs; or 5) overflows to another combined sewer, not to the river.

Section 3: Describe protocols for maintaining signage (e.g., inspections at set intervals).

Signs will be inspected yearly at a minimum and will be replaced or repaired whenever they have been damaged.

Section 4: Identify any affected public entities, municipalities, public drinking water supplies, public parks with water access, and/or Indian Tribe(s), and describe other sensitive area(s) identified in the permittee's long-term CSO control plan, that may be impacted by the permittee's CSO discharges.

The City of Elyria’s CSOs discharge to the Black River within 10 miles of the river’s discharge into Lake Erie. The Black River is designated for the following uses under Ohio’s Water Quality Standards (OAC 3745-1-27): Warm water Habitat, Season Salmonid, Agricultural Water Supply, Industrial Water Supply, and Primary Contact Recreation. The existing CSO Long Term Control Plan did not find any additional sensitive areas within the city, other than the parks listed above.

Entities which were contacted with regard to CSO notification include the following:

- 1) Lorain County Public Health, Jill Lis, Director, 440-322-6367. She would like to be notified. Sensitive Areas include any public access point on the river that could be reasonably impacted by discharges from Elyria’s CSOs (Cascade Park, Elywood Park, Bur Oak Park).

- 2) Sheffield Village, John Hunter, Mayor, 440-949-6325. He would like to be notified. No Sensitive Areas in his domain.
- 3) Lorain County Metroparks, James Ziemnik, Director, 440-458-5121. He would like to be notified. Sensitive Areas include: Cascade, Elywood, and Bur Oak Parks.
- 4) City of Lorain Water Purification Plant, Chad Johnson, Superintendent, 440-204-2280. He would like to be notified. Sensitive Area: water intake out on Lake Erie.
- 5) Lorain County Emergency Management Agency, Tom Kelley, Department of Homeland Security, 440-329-5117. He would like to be notified. No Sensitive Areas in his domain.
- 6) Black River Area of Concern Advisory Committee, Stephanie Moore Koscho, of Loco 'Yaks, 419-239-3779. She would like to be notified. Sensitive Areas include the canoe/kayak recreation on the river.

Section 5: Summarize significant comments and recommendations raised by the local public health department.

City representatives met with Ms. Jill Lis, of Lorain County Public Health during the first stages of preparing this Public Notification Plan. Ms. Lis reviewed the City's list of potential sensitive areas and other aspects of the Plan. Ms. Lis suggested that the city inform the health department of any food service establishments that do not maintain grease traps. This was added into the Nine Minimum Controls (#1 and #3) in Appendix C. Ms. Lis has received and approved this CSO Public Notification Plan.

Section 6: Describe protocols for the initial and supplemental notice to public health department, other public entities and residents.

For the Initial Notification, emails will be provided to the agencies and other interested parties on the contact list. The email will be sent within 4 hours of the Wastewater Treatment Plant personnel becoming aware of the overflow event.

The initial notice will have the following information included:

1. Date and approximate time the discharged commenced
2. Water body that received the discharge
3. Location of discharge
4. Status at time of notification: active/not active
5. Public access areas potentially impacted
6. Municipality point of contact: Terry Korzan, WWTP Superintendent/Biologist, City of Elyria, Ohio; 440-366-2211 ext. 5100; tkorzan@cityofelyria.org

The supplemental notification will be provided to the agencies and other interested parties within 7 days. The supplemental notice will be sent by email and will have the following information added:

1. Statement that the CSO has ended
2. Date and approximate time the discharge ended
3. Estimated volume

The WWTP Superintendent, Terry Korzan, will be sending the initial and supplemental notifications. Anytime the WWTP superintendent is away, another operator in responsible charge (ORC) will have authorization to release overflow reports, following the same protocols as the superintendent. At the time of writing this plan, Erin Stefek, Collection System Senior Manager, would be the alternate ORC.

Templates for the initial and supplemental notices are located in Appendix B.

Section 7: Describe protocols for the initial and supplemental notice to the public; this shall include a description of circumstances under which the initial notification of the public may be delayed beyond four hours of the permittee becoming aware of the discharge, which shall only include circumstances where a physical action is needed to limit the public health impacts of a CSO discharge by controlling the CSO discharge (including continuing to implement its existing practice of conducting inspections of CSO discharge points during the discharge), and all available staff are required to complete this action, and, therefore, are not available to initiate the initial notification until this action is complete.

The Elyria WWTP will create and maintain a list of email contacts. Table 2 below details the current list of individuals who will be notified. Other members of the public can request to be placed on or taken off the list by contacting the WWTP Superintendent. Everyone on the email list will receive the initial (Section 6) notifications at the same time, within four hours of the WWTP personnel becoming aware of the overflow event.

The following outreach efforts will be made to notify the public that they may be added to the notification list:

1. Flyers will be added to the water bill, describing the CSO Public Notification Program and listing instructions on how to be notified.
2. An advertisement will be prepared for the local newspaper informing readers how to contact the Superintendent to get added to the email list.
3. Outreach will be included in the Consumer Confidence Report mailed annually to all residents by the Elyria Water Pumping Plant.
4. Local radio ads explaining CSOs to the listener and how they can join the email listserv.
5. Annually mailing letters to East Avenue residents whose back yards go down to the river.
6. Outreach at quarterly community meetings, city council meetings, Parks & Recreation Department programs, the Annual Apple Festival Weekend and other community events.

Following is a table of email contacts thus far.

Title, Name	Email
Elyria WWTP Superintendent, Terry Korzan	tkorzan@cityofelyria.org
Elyria Safety Service Director, Mary Siwierka	msiwierka@cityofelyria.org
Elyria City Engineer, John Schneider	jschneider@cityofelyria.org
Elyria Assistant City Engineer, Kathy McKillips	kmckillips@cityofelyria.org
Elyria Parks and Recreation Department, Director, Carrie Reardon	creardon@cityofelyria.org
Elyria Collection System Manager, Erin Stefek	estefek@cityofelyria.org
Elyria Collection System Assistant Manager, Chris Werling	cwerling@cityofelyria.org
AECOM, Steven Benton	steven.benton@aecom.com
AECOM, Robert Budzilek	bob.budzilek@aecom.com
Lorain County Public Health, Jill Lis	jlis@loraincountyhealth.com
Mayor of Sheffield Village, John Hunter	mayorhunter@sheffieldvillage.com
Lorain County Metroparks, Director, James Ziemnik	jziemnik@metroparks.cc
Lorain County Metroparks, Planning Supervisor, Donald Kasych	dkasych@metroparks.cc
Lorain Water Filtration Plan, Superintendent, Chad Johnson	chad_johnson@cityoflorain.org
Lorain County Emergency Management Agency, Director, Tom Kelley	tkelley@loraincounty.us
Loco 'Yaks, Facilitating Agency for Black River AOC, Stephanie Moore Koscho	lorainblackriverAOCAC@gmail.com

Table 2. Current email contacts included on CSO notification list.

Section 8: Describe, for each CSO discharge point, how the volume and duration of CSO discharges shall be either measured or estimated.

Overflow volumes are estimated based on Manning’s Equation, which takes into account the size and slope of the pipe and the roughness coefficient. The equation assumes the pipe is flowing at full capacity. Based on previous studies, when the flow rates to the wastewater treatment plant reach or exceed 30 MGD, CSO overflows may be occurring. If a CSO overflow is observed to be active, the City estimates the volume using the following equation:

$$Q = \frac{669 A R^{2/3} S^{1/2}}{n}$$

Where:

Q = Flow in gallons/minute

n = Manning’s coefficient of roughness, dependent on pipe material

A = Cross-sectional area of flow, in square feet

R = Hydraulic radius in feet

S = Slope of the hydraulic gradient

669 = Constant that provides the answer in gallons per minute

It has been determined through observations that overflows occur after the WWTP reaches a flow rate of 30 MGD; therefore, duration of flow is calculated as the time from when the flow first hits 30 MGD until it returns to below 30 MGD. The CSO structures are designed to prevent overflows before the flow rate to the WWTP reaches 30 MGD. The City of Elyria will periodically check the overflow structures when flows are 25-30 MGD to confirm that they are working correctly and that no overflows are occurring.

After each rain event, CSO locations are again inspected in accordance with the City's existing "Combined Sewer System Operational Plan."

Section 9: Describe protocols for making the annual notice available to the public and the EPA Director.

The availability of the annual report will be provided to the Ohio EPA and US EPA (NPDES_CS0@epa.gov). A PDF copy of the CSO Annual Report will be sent to interested parties via the email listserv. Additionally, availability of the CSO Annual Report will be announced at City Council meetings and will be posted to the wastewater page of the City's website (www.cityofelyria.org/department/wastewater/). A template for the annual report is located in Appendix C.

Included in Appendix C is information regarding the city's compliance with the nine minimum controls.

Section 10: Describe significant modifications to the plan that were made since it was last updated.

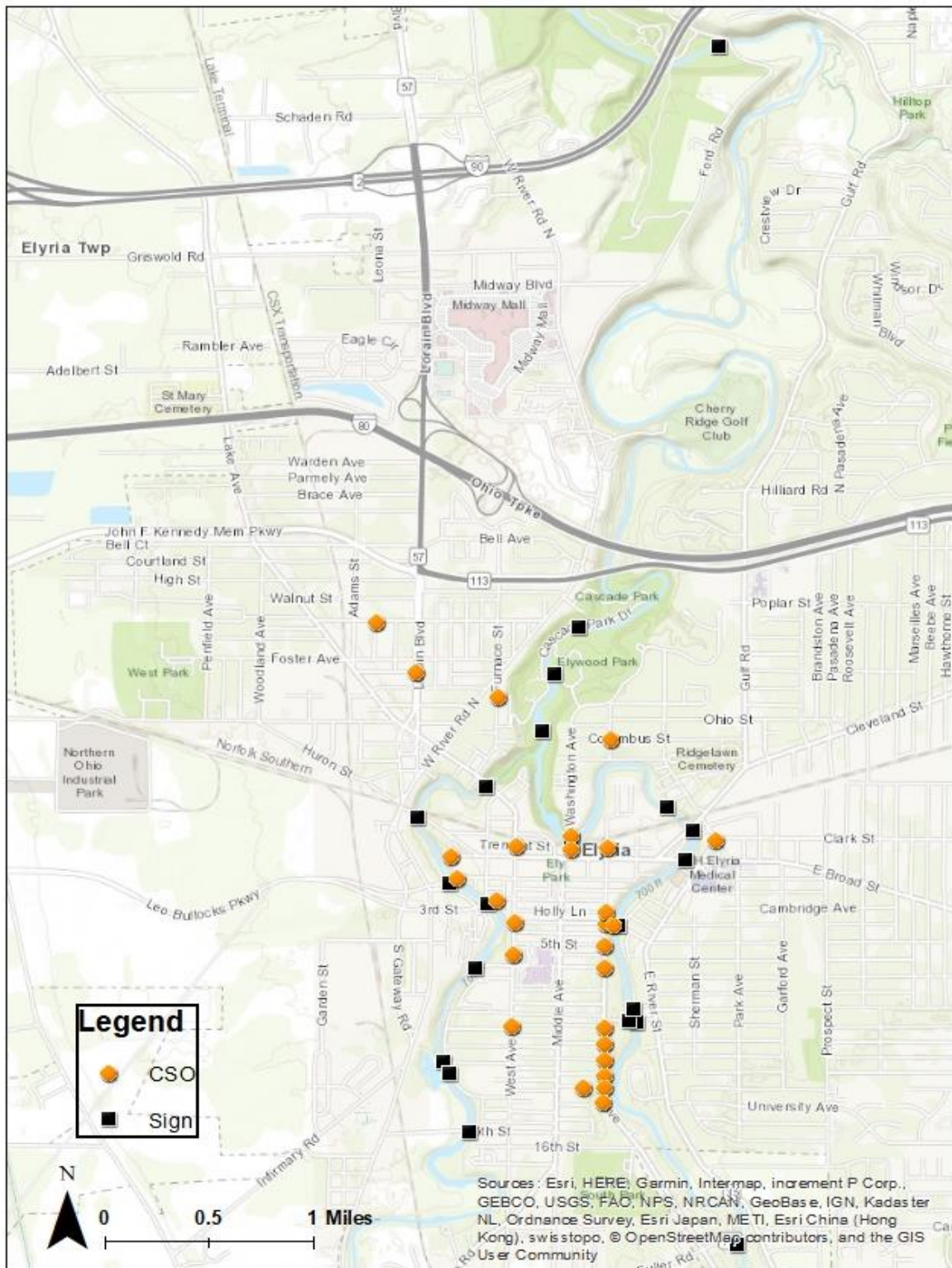
This is the first year of the plan; therefore no modifications have been made thus far.

Appendix A

CSO Public Notification Plan

Map and Tables of CSOs and Signage

CSOs and Signage Elyria, Ohio



Black River, East Branch, Sign Locations	Upstream CSO Outfalls
Fuller Road Bridge	None
Riverdale Court - Dead End	3PD00034031 3PD00034030 3PD00034029 3PD00034028 3PD00034027 3PD00034026 3PD00034025
Wolf Court - Dead End	all of above
Elizabeth Street - Dead End	all of above
East 4th Street Bridge	all of above & 3PD00034022 3PD00034021 3PD00034020
Broad Street Bridge	all of above & 3PD00034044
East Bridge Street Bridge	all of above
Smith Court - Dead End	all of above
Washington Avenue Bridge	all of above & 3PD00034032 3PD00034006 3PD00034038

Table 1. Black River, East Branch sign locations and contributing outfalls.

Black River, West Branch, Sign Locations	Upstream CSO Outfalls
Mussey Avenue Bridge	None
Riverside Drive @ 12th Street	None
Riverside Drive @ 11th Street	None
6th Street - Dead End	3PD00034019
3rd Street Bridge	all of above & 3PD00034018 3PD00034016
2nd Street Bridge	all of above & 3PD00034035
West Bridge Street Bridge	all of above & 3PD00034037
Lake Avenue Bridge	all of above

Table 2. Black River, West Branch sign locations and contributing outfalls.

Black River, Main Stem, Sign Locations	Upstream CSO Outfalls
Cascade Park, Duck Area	East Branch & West Branch & 3PD00034007 3PD00034008 3PD00034015
Cascade Park, Ford Area	all of above & 3PD00034013
Elywood Park, Ford Area	all of above
Cascade Park, Nineteen Acres Area	all of above
Bur Oak Park, Canoe/Kayak Launch	all of above & 3PD00034011 3PD00034012

Table 3. Black River, main stem, sign locations and contributing outfalls.

Appendix B

CSO Public Notification Plan

Initial and Supplemental

Email Notification Templates

Initial Notification:

To all concerned agencies and interested party recipients:

A combined sewer overflow (CSO) has begun from the City of Elyria's combined sewer collection system. Pertinent information is as follows:

Date and time begun: mm/dd/yyyy hh:mm am/pm
 Water body that received discharge: Black River
 Location of discharge:
 Status at time of notification active/not active
 Public access areas potentially impacted:
 For more information contact: [440-366-2211 ext. 5100](tel:440-366-2211); tkorzan@cityofelyria.org

Note: Elyria is making improvements to its sewage collection system to limit these overflows.

Supplemental Notification:

To all concerned agencies and interested party recipients:

A combined sewer overflow (CSO) has ended from the City of Elyria's combined sewer collection system. Pertinent information is as follows:

Date and time begun: mm/dd/yyyy hh:mm am/pm
 Date and time ended: mm/dd/yyyy hh:mm am/pm
 Water body that received discharge: Black River
 Location of discharge:
 Status at time of notification: not active; the event has ended
 Public access areas potentially impacted:
 For more information contact: [440-366-2211 ext. 5100](tel:440-366-2211); tkorzan@cityofelyria.org
 Total CSO volume: x.xxx million gallons
 Total rainfall for the overflow event: x.x inches

Note: Elyria is making improvements to its sewage collection system to limit these overflows.

Appendix C

CSO Public Notification Plan

Annual Report Template

**City of Elyria, Ohio
CSO Notification Plan
Annual Report for 20__**

The City of Elyria has combined sewer overflows (CSOs) on the Black River within ten miles of its discharge into Lake Erie. Public access areas affected by CSOs include Elywood Park, Cascade Park, and Bur Oak Park. A summary of (this/these) event(s) is as follows:

Date at Start	Time at Start	Date at End	Time at End	WWTP Flow Before (MGD)	WWTP Max. Flow (MGD)	Duration of Event (Hrs.)	Rainfall (Inches)*	CSO Overflow (Y/N)	Cause of Overflow

Date	CSO Outfall Station #	Location	TSS (mg/L)	cBOD5 (mg/L)	Volume (MG)	Duration (Hrs)

* Rainfall data is from the tipping bucket rain gauge located at the WWTP. This data is tied into the WWTP plant SCADA system.

For more information contact Terry Korzan, 440-366-2211 ext. 5100; tkorzan@cityofelyria.org

The City of Elyria, operates and maintains its combined sewer collection system in accordance with the U.S. EPA's 1994 nine minimum controls (*Federal Register / Vol.59, No.75 / Tuesday, April 19, 1994 / Notices* Section II B. page18691). A brief description of the controls and Elyria's activities for compliance with this regulation is as follows:

NMC-1: Reducing CSO Overflows through Operation & Maintenance

Elyria continues to implement its Collections System Operations and Maintenance Program for the combined sewer, separate sanitary sewer and storm sewer systems. The combined sewers are cleaned annually and more often when CSO post-rain or dry-weather inspections indicate that additional cleaning is required. All regulators are checked for deterioration on a monthly basis and are repaired as needed. The sanitary sewers are currently cleaned on approximately a three-year rotation and the storm sewers are cleaned on approximately a five-year rotation. The City keeps a list of known problem areas, such as siphons and areas that have recurrent root-intrusion issues. These areas are cleaned and root-cut twice per year. The Industrial Pretreatment Department has an aggressive grease trap/interceptor inspection program. Any food service establishment (FSE) found to have grease in the effluent from the trap or interceptor receives a Notice of Violation and is fined. Lorain County Public Health also gets notified of FSEs that do not properly maintain their grease traps. Sanitary sewers in areas where several FSEs are located are cleaned more frequently to maintain sewer capacity. This, and more, is done to prevent premature activation of overflows during wet weather and to prevent dry weather overflow activations.

NMC-2: Storing CSO Overflows in the Collection System

Elyria maximizes storage in the collection system through its aggressive sewer cleaning regimen as detailed in the Collection System Operations and Maintenance Program. Sewers with diameters greater than 36 inches are cleaned by contractors. Additionally, the West Side Interceptor (WSI) was designed to have excess capacity and the City is making use of that additional capacity by moving wastewater flows from the East Side Interceptor (ESI) to the WSI. Completed projects that have taken advantage of the excess capacity of the WSI include building of the South East Interceptor which directs flows from the south east section of Elyria to the WSI, reversal of the Cascade Park siphon which removed flows from the ESI in the Middle Avenue/Washington Avenue/Ohio Street areas to the WSI during rain events, and the building of the Turner Street lift station, which took flows from the western downtown area and diverted them to the WSI. Elyria just completed the East Avenue Relief Sewer Project, which resulted in the replacement of several old combined sewers on East Avenue with two side-by-side 72-inch barrel pipes with a restrictor plate designed to store combined sewer flows in the East Avenue area during wet weather events. This project will markedly reduce CSO overflow activations in this area. The City also has a 78-inch diameter East Side Relief Sewer under construction. This ten mile long wet weather relief sewer will pick overflow volumes as well as relieve excess flows from neighborhoods that currently experience flooding problems during heavier rain events. The project will take several years to complete.

NMC-3: Reduction of CSO Impacts through the Pretreatment Program

Elyria continues to monitor industrial discharges. There is only one combined sewer that accepts flows from a commercial/industrial area. There are currently no significant industrial users or non-significant industrial users on this combined sewer. There is one CSO regulator on this sewer, CSO 130 located at the intersection of Furnace Street and Florence Court. This overflow has never been known to be active, even in the heaviest of rain events. As noted in NMC-1 above, the Industrial Pretreatment Department routinely inspects grease traps and interceptors at food service establishments (FSEs). Any FSE found to have grease in the effluent from the trap/interceptor receives a Notice of Violation and is fined. Lorain County Public Health also gets notified of FSEs that do not properly maintain their grease traps.

NMC-4: Maximizing Flow to the Treatment Plant

The sanitary and combined sewer maintenance program ensures that all sewers are able to convey the maximum flow volumes possible to the Elyria WWTP. The storm sewer maintenance program ensures that rain waters are conveyed appropriately to the Black River, thus reducing the amount of possible infiltration into the sanitary sewers. Elyria continues to operate the WWTP at its maximum treatable flow rate during wet weather flow conditions. In addition to the existing 1.6 MG wet weather storage tank, the City has also converted two out of service intermediate clarifiers into wet weather storage tanks, providing an additional 1.8 MG of wet weather storage. Primary clarifiers 1 & 2 at the east side head works are also placed into service during wet weather providing an additional 0.3 MG of wet weather treatment. The City has projects planned at the WWTP that will increase the maximum treatable wet weather flows from 30 MGD to 40 MGD. These projects will take several years to complete.

NMC-5: Preventing Dry-Weather CSO Overflows

There were no dry-weather overflows during the previous reporting year. The CSO Operational Plan includes several activities that are designed to prevent dry-weather overflows. In addition to inspecting CSO regulators during wet weather events, the City also performs post-rain inspections at all CSO regulators that are known to collect leaves, twigs and other debris during rain events. If such materials are seen around the regulators, the sewer maintenance crew is called and the debris is removed and the combined sewer is cleaned. Furthermore, during dry weather, all CSO regulators are checked monthly to make sure the regulators are clean and in good repair, and the flow in the combined sewer is at its normal low level. Higher than normal levels may indicate a partial plug in the combined sewer downstream of the regulator and the sewer maintenance crew would be called to clean the combined sewer.

NMC-6: Controlling Solids and Floatables in CSO Discharges

Twice a year the City hires a street sweeping contractor to sweep the streets in the city. In 2017, 516 tons of sweepings were disposed of by the contractor. The City also has an ongoing anti-litter campaign. This program uses a multi-media approach where anti-litter messages are

provided by radio, newspaper, city website, utility bills, Consumer Confidence Report, selective mailings, and public events, such as the annual Apple Festival.

NMC-7: CSO Inspection, Monitoring and Reporting

Elyria currently performs all monitoring of CSOs visually, at the regulators. The use of electronic flow meters was considered but, due to the short storm pipe runs from the CSO regulators to the river, it was quickly determined that the flow meters would be continually damaged by raccoons and other animals that can access the storm pipes and manholes from the river. Studies were performed to determine the optimal flow rate at the WWTP at which the CSO regulators should be inspected during wet weather events. From these studies, it is known that CSO regulators will not overflow when the flow rate to the WWTP is less than 30 MGD. As such, collection system personnel are sent out to inspect the CSO regulators, as per the City's NPDES permit, when the flow rate to the WWTP reaches 30 MGD. CSO regulators are inspected during wet weather events, during the post-rain period and during dry weather, as mentioned in NMC-5 above. The City of Elyria will periodically check the overflow structures when flows are 25-30 MGD to confirm that they are working correctly and that no overflows are occurring. Results from CSO wet weather inspections are reported monthly in the electronic discharge monitoring report (eDMR) submitted to Ohio EPA by the WWTP, and in the Annual CSO Report also submitted to Ohio EPA. Going forward, the City will continue to make available the Annual CSO Report to the public and the City will also inform the Director of EPA as to the method by which the report will be made public.

NMC-8: Pollution Prevention

The City of Elyria works with the Lorain County Solid Waste Management District to publicize information that discusses the proper disposal of household hazardous waste materials, such as motor oil, antifreeze, paint, lawn and garden products, insecticides, mercury-containing items, electronic scrap, and scrap tires. The City also works with the Barnes Nursery facility located near the downtown area to provide residents with a place to take brush, grass clippings and leaves. The City Sanitation Department also has a brush truck that follows the trash and recyclable trucks on their regular routes through the city. As part of the City's Storm Water Pollution Prevention Plan, public outreach materials pertaining to storm water quality issues are distributed to the public in the same manner as the anti-litter program materials discussed in NMC-6 above.

NMC-9: Public Notification

A public notification process was initiated with the submittal of the City's original CSO Long-Term Control Plan in 1998. Signage was posted at the CSO outfalls on the East Branch of the Black River and at Cascade Park to notify the public of the presence and hazards of CSO discharges. The signs posted on the East Branch did not last long due to the continual floating of large trees down river during the larger rain events. The signage at Cascade Park remained.

Notification of the public continued annually with the submittals of the Annual CSO Reports. The original public notification process is now being replaced with the action items listed in Section 7 of this document.