



December 1, 2014

Lisa Kiefel
US Army Corps of Engineers
CECW-CE
441 G St., N.W.
Washington, D.C. 20314-1000

Dear Ms. Kiefel:

As required by Sec. 7001 of P.L. 113 – 121, “Report to Congress on Future Resources Development”, we respectfully request a feasibility study be conducted at the Dayton International Airport for the project described below.

1. Non-Federal sponsors: City of Dayton, James M. Cox, Dayton International Airport (DAY).
2. Feasibility study.
3. The study’s purpose would examine the overall state and cost estimate for the replacement and reconstruction to ensure the sustainability of the wastewater and storm water infrastructure at DAY.
4. Cost of the study: Total cost for storm water and wastewater infrastructure replacement: \$20M.
5. Benefits of project: Currently, DAY is spending an additional \$250,000 annually in the form of response costs, infrastructure repair, and wastewater treatment fees for inflow and infiltration. Rerouting the airports’ storm and wastewater flows to the Montgomery County Wastewater Disposal Plant, the City would realize a net cost savings of nearly 50%.

The project would bolster transportation by ensuring DAY, the country’s 80th largest airport, is in sufficient condition to meet the passengers’, tenants’, the States’ and country’s transportation current and future capacity needs. Replacing the water infrastructure would ensure the airport is kept up-to-date on infrastructure needs and will provide service for the airport for another 40-plus years.

Lisa Kiefel
December 1, 2014
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The environmental benefit would be several: first, it would allow DAY to reroute its wastewater flow through the County's higher capacity sewer system to Dayton's water reclamation facility, thereby reducing peak-flow demands to its current wastewater treatment provider. (See attached US Environmental Protection Agency (EPA) letter to Tri-Cities North Regional Wastewater Authority regarding findings and orders as issued by the US EPA). Secondly, it would replace the existing, 60 year-old sewer main and airport storm water runoff infrastructure with larger and uncompromised lines eliminating the possibility of future wastewater runoff into the Great Miami River Watershed.

6. Local support: the City of Dayton, Montgomery County, and the Dayton Area Chamber of Commerce realize the need to keep the regions' airport in sufficient condition to accommodate the areas' passengers.
7. Non-federal cost sharing: DAY is prepared to make the necessary cost sharing match.
8. Letters of support: see attached.

For additional information, please contact me at 937-454-8212. We look forward to hearing from you.

Sincerely,


Terrence G. Slaybaugh
Director of Aviation

Attachments: (4)

NAN WHALEY
MAYOR



OFFICE OF THE MAYOR
CITY HALL • 101 WEST THIRD STREET
P.O. BOX 22 • DAYTON, OHIO 45401
(937) 333-3636 • www.daytonohio.gov

November 26, 2014

Ms. Lisa Kiefel
U.S. Army Corps of Engineers
CECW-CE
441 G Street, N.W.
Washington, D.C. 20314-1000

Re: Dayton International Airport

Dear Ms. Kiefel:

I am pleased to support the James M. Cox Dayton International Airport as they seek to complete a Water Infrastructure Needs Feasibility Study. The study would examine the overall state of the airport's system to ensure the sustainability of the wastewater and storm water infrastructure as well as create a cost estimate for the replacement and reconstruction of the system.

Today, the Dayton International Airport spends an additional \$250,000 annually in the form of response costs, infrastructure repair, and wastewater treatment fees for inflow and infiltration. If permitted, the airport would reroute its wastewater flow through Montgomery County's higher capacity sewer system which flows to the City of Dayton's water reclamation facility. Furthermore, the airport would have the opportunity to replace the existing 60 year old sewer main and airport storm water runoff infrastructure with larger and uncompromised lines, eliminating the possibility of future wastewater runoff Great Miami River Watershed.

Located 9 miles north of the City of Dayton, the Dayton International Airport currently covers an area of approximately 4,500 acres. As the country's 80th largest airport, the Dayton International Airport is located at the intersection of I-70 and I-75, providing service to Southwest Ohio. Conducting the Water Infrastructure Needs Feasibility Study and rerouting the airports storm and wastewater flows to the Montgomery County Wastewater Disposal Plant, will ensure that the airport is in sufficient condition to sustain wastewater and storm water and will continue to be viable asset to the Region.

Sincerely,

Nan Whaley
Mayor



**Montgomery County
Administration Building**
451 West Third Street, 11th Floor
Dayton, OH 45422-1110

www.mcohio.org

COUNTY COMMISSIONERS

Judy Dodge
Dan Foley
Deborah A. Lieberman

COUNTY ADMINISTRATOR

Joseph P. Tuss

November 24, 2014

Lisa Kiefel
US Army Corps of Engineers
CECW-CE
441 G St., N.W.
Washington, D.C. 20314-1000

RE: Dayton International Airport

Dear Ms. Kiefel:

This letter confirms our support of a Water Infrastructure Needs Feasibility Study to be conducted at the Dayton International Airport.

Sincerely,

A handwritten signature in cursive script that reads 'Joseph P. Tuss'.

Joseph P. Tuss, County Administrator
Montgomery County

DAYTON

Dayton Area
Chamber of Commerce

22 E. Fifth Street
Chamber Plaza
Dayton, OH 45402-2400
www.daytonchamber.org

November 25, 2014

Lisa Kiefel
US Army Corps of Engineers
CECW-CE
441 G St., N.W.
Washington, D.C. 20314-1000

RE: Dayton International Airport

Dear Ms. Kiefel:

As a key partner with the Dayton International Airport (DAY), the chamber works with city and regional leaders to promote and enhance the area in and around the airport as a driver of future economic development and job growth. We are committed to making sure the airport and surrounding land is used and properly protected.

Located 9 miles north of the City of Dayton, the Dayton International Airport currently covers an area of approximately 4,500 acres. The Dayton International Airport is located at the intersection of I-70 and I-75, giving it access to one of the most highly traveled intersections in the United States. The Dayton International Airport provides service to southwest Ohio and is an economic engine for the Region.

We believe that the Airport must continue and grow as a resource engine for the Miami Valley. This letter is to let you know that we are supportive of a Water Infrastructure Needs Feasibility Study to be conducted at the Dayton International Airport.

Sincerely,



Phillip L. Parker, President and CEO
Dayton Area Chamber of Commerce



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 23 2010

REPLY TO THE ATTENTION OF:

WC-15J

CERTIFIED MAIL 7001 0320 0006 0191 0332
RETURN RECEIPT REQUESTED

Mr. David J. Heckler
Tri-Cities North Regional Wastewater Authority
3777 Old Needmore Road
Dayton, Ohio 45424

Subject: Tri-Cities North Regional Wastewater Authority Order for Compliance
and Request for Information Pursuant to 33 U.S.C. §§ 1318 and
1319(a)(3) Docket No. V-W-10-AO-06

Dear Mr. Heckler:

Protecting water quality is a high priority of the U. S. Environmental Protection Agency. Pollutants such as pathogens discharged to waterways from sanitary sewer overflows contribute to poor water quality and impairment of uses of those waterways.

EPA is issuing this administrative order to the Tri-Cities North Regional Wastewater Authority, pursuant to sections 308 and 309(a) of the Clean Water Act (CWA), 33 U.S.C. § 1319(a). In the Order, EPA asserts that the Tri-Cities North Regional Wastewater Authority has violated the conditions of permit number OH0049646 issued under the National Pollutant Discharge Elimination System (NPDES) and seeks to bring the Tri-Cities North Regional Wastewater Authority back into compliance with the terms of the permit.

In March and April of 2009, representatives of EPA and the Ohio EPA conducted an inspection of compliance evaluation inspection at Tri-Cities North Regional Wastewater Authority and the associated cities of Huber Heights, Vandalia, and Tipp City. Information gathered during the field inspection and additional information provided by the Ohio EPA demonstrate that the Tri-Cities North Regional Wastewater Authority has discharged untreated sanitary waste in the form of sanitary sewer overflows on numerous occasions to waters of the United States, in violation of specific terms of the NPDES permit.

Please send your written responses to the addresses specified in the Order. This Order requires you immediately to cease all sanitary sewer discharges and take any necessary action to comply with the CWA. Please note that within 5 days of this Order's

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

IN THE MATTER OF:)	
)	DOCKET NO.: V-W-10-AO- 06
TRI-CITIES NORTH REGIONAL)	
WASTEWATER AUTHORITY,)	PROCEEDING UNDER
DAYTON, OHIO,)	SECTIONS 308(a) & 309(a)
)	OF THE CLEAN WATER ACT
RESPONDENT.)	
_____)	

ORDER

STATUTORY AUTHORITY

1. The Director of the Water Division, U.S. Environmental Protection Agency Region 5, makes the following **FINDINGS** and issues the following **ORDER** pursuant to the authority of the Administrator of the EPA under sections 308 and 309(a) of the Clean Water Act (CWA), 33 U.S.C. §§ 1318 & 1319(a). The Administrator delegated this authority to the Regional Administrator, EPA, Region 5, who then re delegated the authority to the Director of the Water Division, EPA, Region 5.

2. Section 309(a)(3) of the CWA, 33 U.S.C. § 1319(a)(3), states that whenever the Administrator finds a person in violation of section 301(a) of the CWA, 33 U.S.C. § 1311(a), or a condition in a permit issued under section 402 of the CWA, 33 U.S.C. § 1342, she may issue an order requiring that person to comply with the provisions of the CWA and the requirements of the permit.

3. Section 308(a) of the CWA, 33 U.S.C. § 1318(a), authorizes the Administrator to require the owner or operator of any point source to establish and maintain records, make reports, install, use and maintain monitoring equipment, sample effluent and provide any other information she may reasonably require to carry out the objectives of the CWA.

4. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants to the waters of the United States by any person except in compliance with, among other provisions, section 402 of the CWA, 33 U.S.C. § 1342.

5. Section 402 of the CWA, 33 U.S.C. § 1342, establishes the National Pollutant Discharge Elimination System (NPDES) by which the Administrator may issue permits for the discharge of pollutants to the waters of the United States subject to certain conditions.

15. Respondent must immediately begin forwarding copies of all notifications it makes to OEPA regarding the discharges of sanitary sewage from its sewage collection system to EPA at the following address:

Sally Swanson, Chief
Water Enforcement and Compliance Assurance Branch (WC-15J)
U.S. Environmental Protection Agency
77 West Jackson Boulevard
Chicago, Illinois 60604

These notifications include all those required under Part I.B and Parts II.E and F of NPDES permit OH0049646.

16. Respondent must properly manage, operate, and maintain all parts of its sanitary sewer collection system at all times. This requirement includes:

- a. eliminating all sanitary sewer overflows (SSOs);
- b. providing adequate capacity to convey base flows and peak flows for all parts of the sanitary sewer system;
- c. monitoring for the existence of all SSOs in all parts of the sanitary sewer system; and
- d. mitigating the effects of SSO events on human health and the environment.

17. Within five calendar days of receipt of this Order, Respondent must implement a procedure to report all SSOs from its sewers. This procedure must include:

- a. Notification to OEPA (1-800-282-9378) and the Montgomery, Miami or Greene Counties Board of Health, as appropriate, within one hour of learning of the SSO. Notification will include location of the SSO, the receiving water, if any, and an estimate of the volume of the SSO.
- b. A written report to OEPA (with a copy to the EPA) within five calendar days of the date Respondent became aware of the overflow. The written report must contain:
 - i. The location of the SSO;
 - ii. The receiving water or nearest storm water inlet and associated storm water outfall, if any;
 - iii. An estimate of the volume of the SSO;

- v. identification of the locations of any hydraulic deficiencies (including components of the system with limiting capacity) that are generating SSOs themselves; and
 - vi. identification of the locations of sources of clear water entry into the sanitary sewer system, and an estimate of the benefit (in terms of flow removed) of eliminating each source.
- b. The SSES must be conducted consistent with the procedures outlined in the 1991 EPA "Handbook: Sewer System Infrastructure Analysis and Rehabilitation." Information on obtaining a copy can be found at the EPA web site <http://www.epa.gov/OWM/secttre.htm>.
- c. The SSES must recommend short- and long-term actions to eliminate each hydraulic deficiency identified. The recommendations must:
- i. list all technically feasible alternatives to eliminate the deficiency;
 - ii. estimate the costs for each alternative;
 - iii. identify recommended alternatives for eliminating the deficiency;
 - iv. group the alternatives in projects as appropriate; and
 - v. prioritize the projects and provide a schedule for implementation of all recommended projects. If a project is not recommended, or if an implementation schedule is determined principally by the affordability of the project, Respondent must provide an analysis of the affordability and cost effectiveness of the project, including impacts on user rates and the frequency, volume and duration of overflows.
- d. The SSES must identify both short- and long-term actions to eliminate each source of clear water entry into the sanitary sewer system. For each source, the SSES must identify:
- i. alternative actions to eliminate the source;
 - ii. the costs for each alternative; and
 - iii. the recommended alternative for eliminating the source. Group the alternatives in projects as appropriate, prioritize the projects and provide a schedule for implementation of all recommended projects. If a project is not recommended, or if an implementation schedule is determined principally by the affordability of the project, Respondent must provide an analysis of the affordability

- iii. ensure proper installation, testing and inspection of new and rehabilitated sanitary sewers (such as new or rehabilitated collector sewers and/or new or rehabilitated service laterals); and
- iv. control inflow of grease which may constrict flow or cause blockages in the receiving sanitary sewers.
- e. provide adequate maintenance facilities and equipment for the sanitary sewers;
- f. maintain a map of the sanitary sewer system and SSO locations;
- g. establish proper management of information and the use of timely, relevant information to establish and prioritize appropriate CMOM activities;
- h. conduct routine preventive operation and maintenance activities for the sewers;
- i. develop and implement a permanent program to assess the capacity of the sanitary sewer system and the flows discharged into the sewers owned by Respondent, including installation and maintenance of flow meters at all 12-inch or larger diameter sewer connection points to downstream sewers;
- j. identify and prioritize structural deficiencies and identify and implement short- and long-term rehabilitation actions to address each deficiency;
- k. provide all necessary training to staff on a regular basis;
- l. establish an inventory of all equipment and replacement parts, including but not limited to the identification of critical replacement parts;
- m. establish and implement requirements and standards for the installation of new sanitary sewers, pumps and other appurtenances, and rehabilitation and repair projects;
- n. establish and implement procedures and specifications for inspecting and testing the installation of new sanitary sewers, pumps, and other appurtenances for rehabilitation and repair projects;
- o. monitor the implementation and, where appropriate, measuring the effectiveness of each element of the program;
- p. establish and implement a system for updating the program elements as appropriate based on monitoring or performance evaluations; and

GENERAL PROVISIONS

27. Written statements submitted pursuant to this Order must be returned under an authorized signature certifying that all statements contained therein are true and accurate to the best of the signatory's knowledge and belief. The signatory must possess the authority to sign NPDES permit applications and reports described in 40 C.F.R. § 122.22. Any documents submitted to EPA pursuant to this Order should be certified as authentic to the best of the signatory's knowledge and belief using the following statement:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

28. Should the signatory find at any time after submittal of the requested information that any portion of its response is false or incorrect, Respondent must notify EPA Region 5 immediately. Respondent's failure to fully comply with this Order may subject Respondent to an enforcement action under section 309 of the CWA, 33 U.S.C. § 1319. Knowing submittal of false information to EPA in response to this request may subject you to criminal prosecution under section 309(c) of the CWA, 33 U.S.C. § 1319(c), as well as 18 U.S.C. §§ 1001 and 1341.

29. Pursuant to 40 C.F.R. part 2, subpart B, Respondent is entitled to assert a claim of business confidentiality regarding any portion of the information submitted in response to this Order, except effluent data, as defined at 40 C.F.R. § 2.302(a)(2). If Respondent fails to assert a claim of business confidentiality, EPA may make all submitted information available to the public without further notice. Information which is subject to a claim of business confidentiality may be available to the public only to the extent provided in 40 C.F.R. part 2, subpart B.

30. Any information submitted in response to this Order may be used by EPA in support of an administrative, civil, or criminal action against Respondent. The CWA includes provisions for administrative penalties, for civil injunctive relief and penalties, and for criminal sanctions for violations of the CWA. Specifically, EPA may assess civil administrative penalties of \$11,000 per day of violation, up to a maximum of \$157,500 under 33 U.S.C. § 1319(g) and 40 C.F.R. part 19, for violations occurring after March 15, 2004, and \$16,000 per day of violation up to a maximum of \$177,500 for violations

ATTACHMENT A. SSO occurrences between 1/1/04 and 12/31/08.

Violation number	Date	Sanitary Sewer Overflow Location	Receiving Water
1	1/9/2008	Taylorville Reserve Manhole 40	Great Miami River
2	3/4/2008	Taylorville Reserve Manhole 40	Great Miami River
3	3/4/2008	Tipp City Metering Station	Rohrer's Run to Great Miami River
4	3/4/2008	Little York Siphon (West)	Great Miami River
5	3/18/2008	Taylorville Reserve Manhole 40	Great Miami River
6	3/18/2008	Little York Siphon (West)	Great Miami River
7	3/19/2008	Taylorville Reserve Manhole 40	Great Miami River
8	3/19/2008	Little York Siphon (West)	Great Miami River
9	1/15/2007	Tipp City Metering Station	Rohrer's Run to Great Miami River
10	1/15/2007	Taylorville Reserve Manhole 40	Great Miami River
11	1/15/2007	Little York Siphon (West)	Great Miami River
12	3/1/2007	Tipp City Metering Station	Rohrer's Run to Great Miami River
13	3/2/2007	Taylorville Reserve Manhole 40	Great Miami River
14	3/2/2007	Miami Villas on Apache Manhole 22	Storm sewer to Great Miami River
15	3/15/2007	Taylorville Reserve Manhole 40	Great Miami River
16	3/15/2007	Little York Siphon (West)	Great Miami River
17	3/23/2007	Tipp City Metering Station	Rohrer's Run to Great Miami River
18	3/23/2007	Taylorville Reserve Manhole 40	Great Miami River
19	3/23/2007	Little York Siphon (West)	Great Miami River
20	3/12/2006	Taylorville Reserve Manhole 40	Great Miami River
21	3/12/2006	Little York Siphon (West)	Great Miami River
22	3/12/2006	Little York Siphon (East)	Great Miami River
23	3/12/2006	Miami Villas Manhole 18	Storm sewer to Great Miami River
24	9/12/2006	Taylorville Reserve Manhole 40	Great Miami River
25	12/1/2006	Little York Siphon (West)	Great Miami River
26	12/1/2006	Taylorville Reserve Manhole 40	Great Miami River
27	1/3/2005	Tipp City Metering Station	Rohrer's Run to Great Miami River
28	1/3/2005	Taylorville Reserve Manhole 40	Great Miami River
29	1/3/2005	Poplar Creek Manhole 1	Poplar Creek to Great Miami River
30	1/3/2005	Little York Siphon (East)	Great Miami River
31	1/3/2005	Miami Villas on Apache Manhole 22	Storm sewer to Great Miami River
32	1/3/2005	Main Plant Final Clarifier Splitter Box	Great Miami River
33	1/3/2005	Main Plant Final Clarifier	Great Miami River
34	1/5/2005	Tipp City Metering Station	Rohrer's Run to Great Miami River
35	1/5/2005	Taylorville Reserve Manhole 40	Great Miami River
36	1/5/2005	Poplar Creek Manhole 1	Poplar Creek to Great Miami River
37	1/5/2005	Cassell Road Manhole 26	Great Miami River
38	1/5/2005	Little York Siphon (West)	Great Miami River
39	1/5/2005	Little York Siphon (East)	Great Miami River
40	1/5/2005	Miami Villas on Apache Manhole 22	Storm sewer to Great Miami River
41	1/5/2005	Main Plant Final Clarifier Splitter Box	Great Miami River
42	1/5/2005	Main Plant Final Clarifier	Great Miami River
43	1/11/2005	Tipp City Metering Station	Rohrer's Run to Great Miami River
44	1/11/2005	Taylorville Reserve Manhole 40	Great Miami River
45	1/11/2005	Poplar Creek Manhole 1	Poplar Creek to Great Miami River
46	1/11/2005	Little York Siphon (East)	Great Miami River
47	1/11/2005	Miami Villas on Apache Manhole 22	Storm sewer to Great Miami River
48	1/11/2005	Main Plant Final Clarifier Splitter Box	Great Miami River
49	1/11/2005	Main Plant Final Clarifier	Great Miami River
50	1/13/2005	Tipp City Metering Station	Rohrer's Run to Great Miami River
51	1/13/2005	Taylorville Reserve Manhole 40	Great Miami River
52	1/13/2005	Poplar Creek Manhole 1	Poplar Creek to Great Miami River
53	1/13/2005	Little York Siphon (West)	Great Miami River
54	1/13/2005	Little York Siphon (East)	Great Miami River
55	1/13/2005	Miami Villas on Apache Manhole 22	Storm sewer to Great Miami River
56	1/13/2005	Main Plant Final Clarifier Splitter Box	Great Miami River
57	1/13/2005	Main Plant Final Clarifier	Great Miami River
58	9/16/2005	Taylorville Reserve Manhole 40	Great Miami River
59	1/4/2004	Tipp City Metering Station	Rohrer's Run to Great Miami River
60	1/4/2004	Taylorville Reserve at Creek	Great Miami River
61	1/4/2004	Taylorville Reserve Manhole 40	Great Miami River
62	1/4/2004	Little York Siphon (West)	Great Miami River
63	1/4/2004	Miami Villas at Navaho and Apache	Storm sewer to Great Miami River
64	1/4/2004	Main Plant Headworks	Storm sewer to Great Miami River
65	1/4/2004	Main Plant Final Clarifiers	Storm sewer to Great Miami River
66	5/31/2004	Taylorville Reserve Manhole 40	Great Miami River
67	5/31/2004	Little York Siphon (West)	Great Miami River
68	12/31/2004	Taylorville Reserve Manhole 40	Great Miami River
69	12/31/2004	Miami Villas on Apache Manhole 22	Storm sewer to Great Miami River