INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
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Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

December 10, 2019

VIA ELECTRONIC MAIL

The Honorable Anthony Copeland, Mayor
City of East Chicago
5201 Indianapolis Boulevard
East Chicago, Indiana 46312

Dear Mayor Copeland:

Re: Great Lakes Basin (GLB) Combined Sewer Overflow (CSO) Public Notification Plan
City of East Chicago
NPDES Permit No. IN0022829
Lake County

The Indiana Department of Environmental Management (IDEM) Office of Water Quality (OWQ) has conducted a review of the City of East Chicago's Revised GLB CSO Public Notification Plan submitted via email on November 20, 2019. The GLB CSO Public Notification Plan is a requirement of 40 CFR 122.38(c). After initial review by this Office, the submitted GLB CSO Public Notification Plan appears to meet the minimum necessary requirements of 40 CFR 122.38(c).

This Office offers the following reminders of GLB CSO Public Notification implementation requirements and the on-going rule-making to incorporate 40 CFR 122.38 into 327 IAC 5:

- Permittees were to begin implementation of the GLB CSO Public Notification Plan by **November 7, 2018**. (40 CFR 122.38(a)(2) and (3))

- In May of each year, starting after February 2019, the permittee must provide the required Annual Notice. (40 CFR 122.38(b))

- Future NPDES Permit Application for Renewal must include the submittal of the GLB CSO Public Notification Plan and any noted modifications made to the Plan. (40 CFR 122.21(j)(8)(iii).

- Future NPDES Permits will include new standard conditions which will require implementation of the GLB CSO Public Notification Plans. (40 CFR 122.42(f))

- IDEM is currently conducting a rule-making to incorporate 40 CFR 122.38, 40 CFR 122.21(j)(8)(iii), and 40 CFR 122.42(f) into 327 IAC 5. Please reference the IDEM website to follow the rule-making process: https://www.in.gov/idem/legal/2352.htm.

This Office appreciates your dedication to the implementation of the new public notification requirements. Please direct any questions regarding this letter to Cara Kitchen at 317-233-6870 or by e-mail at ckitchen@idem.in.gov.

Sincerely,



Leigh Voss, Chief
Municipal NPDES Permits Section
Office of Water Quality

cc: Dr. Abdul Zehraoui, ECSD Utilities Director
Ken Myers, ECSD Compliance Manager
Jason Hewitt, U.S. EPA, Region 5
IDEM Northwest Regional Office

City of East Chicago Sanitary District CSO Public Notification Plan

Submitted September 2018

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Section 1.0 Introduction

40 CFR Part 122.38 was amended to require that National Pollutant Discharge Elimination System (NPDES) permittees that are authorized to discharge combined sewer overflows (CSO) in the Great Lakes Basin to develop a public notification plan that describes how the community will ensure that the public receives adequate notification of CSO occurrences and CSO impacts. The following plan has been developed by the East Chicago Sanitary District (District) to fulfill the notification requirements for its NPDES permit #IN0022829

The District's publically–owned treatment works (POTW) collects and treats wastewater generated by approximately 5,440 residential, 200 public/government, 1,265 commercial and small, unpermitted industrial, and 26 permitted industrial accounts. The POTW was re-constructed in 1988 and designed to treat an average design flow of 15 million gallons per day (MGD), a maximum daily flow of 27 MGD, and a peak hourly flow of 36 MGD. The wastewater treatment plant (WWTP) also includes the maintenance of the collection system which collects and transports wastewaters to the WWTP for treatment. The collection system is a combined sanitary and storm sewer system consisting of over 129 miles of sanitary, storm, relief and combined sewers, approximately 45% of which is combined. As part of the operation of the collection system, the District operates and maintains 11 lift stations throughout the city. The District is permitted to discharge at three CSO permitted outfalls into the Grand Calumet River and Indiana Harbor Ship Canal. The location and receiving waterbody are listed below.

Outfall #	Location	Receiving Stream
002	Michigan Avenue Pump Station	Indiana Harbor Ship Canal
003	Alder Street Pump Station	Grand Calumet River
005	WWTP CSO Lagoon	Grand Calumet River

During CSO events (heavy rains) when the flow volume of the storm water and sanitary water exceed the storage capacity of the sewer collection system and the pumping capacity of the sanitary pumps at the lift stations, the Alder Street and Michigan Avenue pump stations discharge combined sewer overflow into the Grand Calumet River and Indiana Harbor Ship Canal, respectively. The Magoun Avenue pump station discharges to the WWTP CSO Lagoon (Outfall 005), which, when it exceeds the lagoon storage capacity, discharges into a channel tributary to the Grand Calumet River. The figure below illustrates the location of the CSO outfalls.



The Grand Calumet River is a 13.0-mile-long river that flows primarily into Lake Michigan. Originating in Miller Beach in Gary, it flows through the cities of Gary, East Chicago and Hammond, as well as Calumet City and Burnham on the Illinois side. The Grand Calumet is divided into an East and West branch, on the respective sides of the Indiana Harbor Canal. The East Branch, which originates in Marquette Park in the City of Gary's Miller Beach neighborhood,

flows westerly through the industrial zone of Gary and into the City of East Chicago and ultimately drains into Lake Michigan via the Indiana Harbor Ship Canal. The West Branch of the Grand Calumet River also partially drains in to the Indiana Harbor Ship Canal as the divide in flow direction is located near the corporate limits of Hammond and East Chicago.

The portion of the Grand Calumet River located within Indiana has been designated a Great Lakes Areas of Concern (AOC) under the Great Lakes Water Quality Agreement. AOCs are designated by having impairment in at least one of fourteen beneficial uses. These impairments include total fish consumption restrictions, beach closings, fish tumors or deformities, animal deformities or reproductive problems, and loss or degradation of fish and wildlife habitat, benthos, phytoplankton, and zooplankton populations, among others. The United States Environmental Protection Agency (USEPA) and the United States Army Corps of Engineers (USACE) have implemented various environmental remediation projects within stretches of the Grand Calumet River and Indiana Harbor Ship Canal to remove and/or cap contaminated sediment to improve the quality of the water and sediment and eventually restore these areas to beneficial use.

Access to the Grand Calumet River and Indiana Harbor Ship Canal is limited. There are no public access areas including public drinking water utilities, parks, recreation areas, public fishing area, or marinas that could be potentially impacted by CSO discharges. Lake Michigan is a sensitive area, but is approximately three miles downstream of the nearest CSO outfall (Michigan Avenue CSO Outfall #002) discharge location to the Indiana Harbor Ship Canal

Section 2.0 Signage at CSO Outfalls

The District currently has signs posted at each of its three CSO outfall locations. New signs were purchased and installed in April 2018. In accordance with Indiana Department of Management's (IDEM's) requirement, the wording on each sign is as follows:

> "This is a combined sewer outfall. This water may be polluted with sewage during or after rain events or snow melts. In the event of discharges from this outfall during dry weather, or for more information, please call the East Chicago Sanitary District at (219) 391-8466.
>
> NPDES Permit # IN0022829 CSO Outfall No. ___"

Two signs were installed at each outfall location and positioned such that one would be visible when viewing the outfall on land and the other positioned so that it is visible if viewing from the water. District personnel will routinely inspect the signs to ensure they are not damaged or, vandalized, or missing. Photographs of the signage are provided below.

PHOTOGRAPHS

Photo 1:

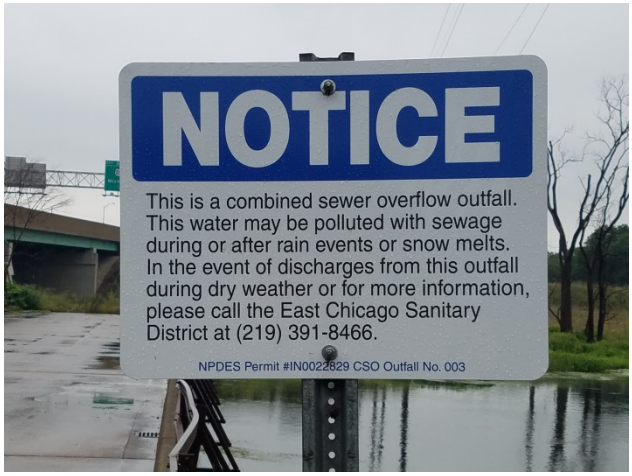


Photo 2:



Photo 3:



Photo 4:



Photo 1: Wording on CSO Signage

Photo 2: View of the CSO #003 signs at Grand Calumet River discharge west of Cline Avenue

Photo 3: View of the CSO #002 signs at Indiana Harbor Ship Canal discharge north side of Canal Street

Photo 4: View of the CSO #005 sign at the CSO lagoon discharge into the Grand Calumet River at WWTP

Section 3.0 Public Stakeholders

The District reached out to the East Chicago Public Health Department for input regarding notification protocols and potential impacted public access areas and have not received a response to date. The District did identify the following public stakeholders who shall receive CSO Notifications in accordance with this plan.

Stakeholder Identification	Contact Person	Contact Number / website
Lake County Health Department, Environmental Department	Paul Garrett	(219) 755-3655 https://www.lakecountyin.org/
East Chicago Waterway Management	John Fekete, President	(219) 391-8535 https://www.in.gov/ecwmd/
Save The Dunes	Natalie Johnson, Executive Director	(219) 879-3564, 122 https://savedunes.org
Northwestern Indiana Regional Planning Commission	Joe Exl, Sr. Water Resources Director	(219) 763-6060, 137 https://www.nirpc.org/

Section 4.0 Initial Four Hour Notice

40 CFR 122.38 requires that initial notice be provided to local public health departments, other potentially affected entities, and the public "as soon as possible, but no later than four (4) hours after becoming aware by monitoring, modeling or other means that a CSO discharge has occurred." The four hour notice to the potentially affected public entities and the general public will be accomplished by the sending an email to persons who have opted in to East Chicago's email notification system whereby stakeholders, interested parties, and the public can receive automatic email notifications immediately upon the initiation of a CSO discharge. These notifications will specify whether the discharge is to the Grand Calumet River or Indiana Harbor Ship Canal. An example notification is as follows:

COMBINED SEWER OVERFLOW NOTIFICATION

> When it rains, the combined sewer system in East Chicago can overflow, resulting in the discharge of a mix of stormwater (rain/snowmelt) and wastewater into the Grand Calumet River and the Indiana Harbor Ship Canal. Such an overflow has occurred on (insert date and time) in the Grand Calumet River in the vicinity of Cline Avenue.
>
> The City of East Chicago recommends that individuals avoid direct contact with water in these rivers during and for three days (72 hours) after a rain event. CSO's from communities upstream of East Chicago can affect water quality in East Chicago for several days following a rainfall or snowmelt event. Consumption of, or direct contact with, waste contaminated water could make you ill.

If you have any questions, please contact the East Chicago Sanitary District at 219-391-8466.

The City's website (http://www.eastchicago.com) has instructions for interested persons to sign up for the CSO notifications.

Section 5.0 Supplemental Seven Day Notice

40 CFR 122.38 states that "Within seven (7) days after becoming aware by monitoring, modeling or other means that the CSO discharge(s) has ended, the Great Lakes Basin CSO permittee shall update the electronic notice with the following information unless the information had been provided in an earlier notice: (A) The measured or estimated volume of the discharge(s). Where CSO discharges from the same system occur at multiple locations during the same precipitation-related event, the Great Lakes Basin CSO permittee may provide an estimate of the cumulative volume discharged to a given waterbody; and (B) The approximate time that the discharge(s) ended, unless this information was provided in an earlier notice."

The City of East Chicago will meet this requirement via its "opt in" email system. This system automatically transmits emails to the recipients who have opted in for CSO Notifications. The emails will specify the outfall, duration, first pump start time, last pump stop time, and calculated CSO volume. Since all CSO's are pumped, the District calculates the volumes as the product of total pump run times and pump capacities. An example of these notifications is as follows:

Michigan Avenue Lift Station
Discharge Time = 2.69 Hours
Discharge Volume= 2.28 MG
First Start= 06:18 Last Stop= 09:33

Section 6.0 Annual Notice

Starting May 1, 2019, the District will prepare an annual notice describing CSO discharges for the preceding calendar year. The Annual Report will be posted on the City of East Chicago's CSO information webpage. The public may also view a copy of the report by contacting the City of East Chicago Sanitary District.

Notification of plan availability will be sent to IDEM and USEPA at NPDES CSO@epa.gov. with a link to the annual notice and the contact information (name, title, phone number, email) of the person responsible for maintaining the website.

The annual notice will contain, at a minimum, the following information:

East Chicago CSO Locations

Outfall #	Location	Receiving Stream
002	Michigan Avenue Pump Station	Indiana Harbor Ship Canal
003	Alder Street Pump Station	Grand Calumet River
005	WWTP CSO Lagoon	Grand Calumet River

1. Date, location, approximate duration, measured/estimated volume, cause for, and any treatment provided for each CSO discharge resulting from wet weather events that occurred during the preceding calendar year;

2. Date, location, duration, volume and cause of each dry weather CSO discharge events from the preceding calendar year;

3. Summary of monitoring data for CSO discharges including:

   a. CSO discharge volumes for each day,

   b. Precipitation for each day to the nearest 0.1 inch that resulted in a CSO discharge;

4. Description of any public access areas potentially impacted by CSOs;

5. The nine-minimum technology-based controls for combined sewer overflows:

   a. Implement a proper operation and regular maintenance program for the sewer system and the CSOs,

   b. Implement procedures that will maximize the use of the collection system for wastewater storage that can be accommodated by the storage capacity of the collection system,

   c. Review and modify existing pretreatment programs to minimize CSO impacts from non-domestic users,

   d. Operate the Publicly Owned Treatment Works (POTW) at the maximum sustainable treatable flow during wet weather flow conditions to reduce the magnitude, frequency and duration of CSOs,

e. Dry weather overflows from CSO outfalls are prohibited and any occurrence must be reported to IDEM immediately and corrective action began,

f. Implement measures to control solid and floatable materials in CSO discharges,

g. Implement a pollution prevention program focused on reducing the impact of CSOs on receiving waters,

h. Implement a public notification process to inform citizens of when and where CSO discharges occur and their impacts,

i. Monitor and effectively characterize CSO impacts and the efficacy of CSO controls,

6. Status of implementation of the LTCP;

a. Previously completed milestones and key milestones remaining;

b. Description of annual number of CSO discharges anticipated after LTCP is fully implemented.

Section 7.0 Plan Updates

The District will review this plan at least once every permit cycle. Additionally, the District may update the plan in response to stakeholder input or regulatory changes. Any changes to the plan will be posted on the Sanitary District's page on the city's web site: http://www.eastchicago.com.