



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1

5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Drafted Date: August 8, 2018
Finalized Date: September 13, 2018

Subj: Inspection Report
Clean Water Act ("CWA"), National Pollutant Discharge
Elimination System ("NPDES")
Sanitary Sewer Overflows ("SSOs")

From: Jack Melcher

Thru: Samantha Couture

To: File

I. Facility Information

- A. Facility Name:* City of Bristol Publicly-Owned Treatment Works
("POTW")
- B. Facility Location:* 75 Battisto Rd
Bristol, CT 06010
- C. Facility Contact:* Sean Hennessey, Water Pollution Control ("WPC")
Manager
860-584-3824, SeanHennessey@bristolct.gov
- D. NPDES ID Number:* CT0100374

II. Background Information

- A. Date and time of inspection:*
Facility entrance: July 24, 2018, 10:00
Facility exit: July 25, 2018, 14:00
- B. Weather Conditions:*
July 24, 2018: Clear
July 25, 2018: Rain
- C. US EPA Representative(s):*
Jack Melcher
Samantha Couture

D. State/Local Representative(s):

Susan Unger, Connecticut Department of Energy and Environmental Protection ("CT DEEP")

E. Federally Enforceable Requirements Covered During the Inspection:

NPDES Permit CT0100374, issued by CT DEEP, most recent re-issuance effective July 1, 2013

F. Previous Enforcement Actions:

No CWA enforcement actions by EPA nor CT DEEP since at least July 1, 2008

III. Type and Purpose of Inspection

EPA performed an inspection to evaluate the City of Bristol's Capacity, Maintenance, Operation, and Management ("CMOM") program for preventing Sanitary Sewer Overflows ("SSOs") in its sanitary sewer collection system ("Collection System").

Section 1(B) of the City's NPDES Permit incorporates by reference Section 22a-430-3 of the Regulations of the Connecticut State Agencies ("RCSA"). RCSA Section 22a-430-3(k)(1) provides the following:

(1) The permittee shall not at any time bypass the collection system or treatment facilities or any part thereof unless

(A) (i) such bypass is unanticipated, unavoidable, and necessary to prevent loss of life, personal injury or severe property damage, and

(ii) there were no feasible alternatives to the bypass, including but not limited to the use of auxiliary or back-up treatment facilities, retention of untreated wastes, stopping the discharges, or maintenance during normal periods of equipment downtime; or

(B) the permittee receives prior written approval of the bypass from the commissioner in order to perform essential maintenance, and the bypass does not cause effluent limitations to be exceeded. The commissioner may impose any conditions on such an approval which he or she deems necessary to protect the waters of the state, including but not limited to requirements for special monitoring or reductions in the release of pollutants and water to the treatment system.

Condition (A) (ii) is not satisfied if the permittee, in the exercise of reasonable engineering judgment, should have installed adequate backup equipment to prevent a bypass.

IV. Facility Description

The City of Bristol, Connecticut (the “City”) is in western Hartford county. The City’s population was estimated to be 60,437 in the 2016 American Community Survey performed by the United States Census Bureau.

The Bristol Water Reclamation Facility (“WRF”) has a design flow of 10.75 million gallons per day (“MGD”) and discharges to the Pequabuck River. The Pequabuck River flows to the Farmington River, which flows to the Connecticut River, which flows to Long Island Sound.

The 2013 re-issuance of the WRF NPDES permit included compliance schedules for phosphorus and Escherichia coli. A plant upgrade for phosphorus removal and disinfection was completed in the summer of 2017.

V. Inspection

The inspection was announced to the facility on June 26, 2018.

The City provided a map of the Collection System via email on July 13, 2018.

On July 24, 2018, at approximately 10:00, Mr. Melcher, Ms. Couture, and Ms. Unger (the “Inspectors”) met with the following facility representatives:

- Sean Hennessey, WPC Manager
- Walter Veselka, Public Works Director
- Dustin Payanis, WPC Assistant Chief Plant Operator and Lab Supervisor
- John Vontrell, WPC Assistant Chief Operator

The sign-in sheet is included as Appendix A.

Mr. Melcher presented his credentials and described the purpose of the inspection.

V.A. Collection System Overview

The facility representatives provided an overview of the Collection System. The City has approximately 245 miles of gravity mains, 5,600 manholes, and 16 pump stations. Approximately 60% of the City’s gravity mains are vitrified clay pipe (“VCP”). Ductile iron pipe is also present to facilitate shallow installation in some older areas of the City. Approximately 90% of the population of Bristol uses the POTW for wastewater disposal; a few areas have septic systems.

Critical interceptors include one under Memorial Boulevard and an off-road interceptor known as “Maltby.”

The Broad Street Pump Station is the largest pump station, conveying approximately 60% of flow to the WRF. Prior to the construction of the current WRF, the City utilized a wastewater treatment plant at a different site, currently the site of the Worcester Court

Pump Station. A siphon is present below the Pequabuck River between the Worcester Court Pump Station and the East Main Pump Station.

Some force mains have pressure relief valves; the City is planning to add a pressure relief valve to the Middle Street Pump Station force main.

The POTW does not have satellite Collection Systems of a significant size.

No catch basins are known to be connected to the Collection System. The Collection System does not have any overflow structures to the environment.

The WRF has a hydraulic capacity of 34 MGD. The WRF does not bypass secondary treatment during wet weather.

V.B. Organization and CMOM Overview

The POTW is operated by the Water Pollution Control (“WPC”) Department. The WPC Department is part of the Bristol Department of Public Works (“DPW”). An organization chart is included in Appendix B.

Mr. Vontrell is the manager of Collection System Operations and Maintenance (“O&M”).

A budget committee of the Board of Public Works and a City Board of Finance in City Council approve WPC’s budgets.

Mr. Hennessey has been working for the City for approximately three months. The previous WPC Manager, Brian Fowkes, held the job for many years.

Some specialty activities are contracted out by WPC, including the following:

- Easement clearing,
- Root control,
- Supplemental gravity main cleaning,
- Slip lining,
- Manhole rehabilitations, and
- On-call emergency repairs.

The City has increased sewer rates in each of the last eight years. The current sewer user charge is \$2.67 per hundred cubic feet, plus a flat quarterly fee according to water meter size (\$22.72 for the smallest meter size). Billing service is provided by the City’s water department.

Drinking water service is supplied by the City, but not from within the DPW.

The City has a CMOM Program Manual with various materials associated with its Collection System O&M. Included in the CMOM Program Manual are two self-assessments and an outline of areas of need for improvement (Appendix C).

The following is a list of the program areas listed in the CMOM Self-Assessment Areas of Need for Improvement:

- Management Information Systems,
- Internal Video Inspections,
- Sewer Cleaning Program, and
- Annual Contract Rehabilitation Programs.

The City has a Ten-Year Program of Capital Improvements (Appendix D). The City has a reserve of approximately \$4.5 million, which will be drawn down somewhat as the phosphorus upgrade is paid off. An allocation of \$200,000 for manhole rehabilitations and frame replacements was planned for FY2017-18 and \$100,000 is planned for FY2019-20. A total of \$7.5 million is planned for extensions of the SSO relief sewer north of the Broad Street Pump Station.

The Debt Payment Schedule and Total Reserve Balance included in the CMOM Program Manual indicates that a 6% rate increase was planned for 2018, a 5% increase is planned for 2019, a 4% increase is planned for 2020, and a 4% increase is planned for 2021.

The City has a written High-Flow Management Plan (Appendix E). The Collection System portion of the High-Flow Management Plan states that in the past, several locations had SSOs. Facility representatives stated that due to the City's projects increasing capacity and reducing inflow and infiltration, these SSOs no longer regularly occur.

CMOM Program Manual also includes the following documents:

- An Emergency Response Plan,
- A Policy for Sanitary Sewer Stoppages,
- A Sewer Backup Questionnaire,
- An emergency notification contacts list,
- A Complaint / Stoppage Documentation Form,
- A WPC Power Priority List,
- A sewer pump list,
- A force main list,
- A vehicle list,
- The City's Sewer Use Ordinance, including a Fats, Oils, and Grease ("FOG") ordinance
- Documents soliciting contractor assistance for off-road tree and brush clearing,
- Documents soliciting contractor assistance for manhole improvements,
- A sewer line cleaning Standard Operating Procedure ("SOP"),
- A pump station wet well cleaning SOP, and
- A Spring 2018 paving / reclaim list.

The City has one open truck driver position. A recently hired person for this position did not pass the probationary period.

V.C. Pump Stations and Siphon

The City has on-site power generation at 15 of its 16 pump stations. The pump station without on-site generation has a “quick connect” plug that can be connected to its trailer-mounted generator.

The City is in the process of providing the ability to use trailer-mounted pumps to bypass pumps.

The City performs vibration analysis of pumps and infrared analysis on pump station electrical components.

The City has remote viewing and control of its pump stations through its Supervisory Control and Data Acquisition (“SCADA”) system. The radio system that connects the pump stations was recently upgraded. The City is in the process of upgrading its Programmable Logic Controllers (“PLCs”) in its pump stations to provide touch-screen hardware.

The City has had repeated entries in its operator’s log book regarding Matthew Street Pump Station. Facility representatives stated that there were issues with the upgrade of its PLCs and with the generator.

The City has had repeated entries in its operator’s log book regarding East Main Street Pump Station. Facility representatives stated that there was a voltage issue with the power company that has been resolved.

V.D. Management Information Systems

The previous WPC Manager, Mr. Fowkes, developed a Microsoft Access database that the City uses for managing its Collection System O&M. According to Mr. Hennessey, the database is approximately 95% populated with asset information. Information in the database for each asset includes the following:

- Identification numbers,
- Adjacent structures,
- Materials,
- Elevation,
- Cleaning dates,
- Inspection dates, and
- Rehabilitations (e.g., grouting and slip-lining).

The City has a Geographic Information System (“GIS”) map of the Collection System. Assets in the GIS are electronically linked to profile plans of sewer assets. GIS maps are managed by the Engineering Department, which, like WPC, is part of DPW.

V.E. Inflow and Infiltration (“I/I”)

Following SSOs in the area of the Broad Street Pump Station, WPC hired Weston & Sampson to conduct a City-wide I/I metering study in 2008. A Sanitary Sewer Evaluation Study (“SSES”) was completed in 2009 and updated in 2010 and 2011 with addition metering and investigations. Since 2011, the City has been implementing projects in three sewer subsections tributary to the Broad Street Pump Stations.

The Recommended Action Plan included in the 2011 I/I update includes the following:

- Installation of a relief sewer;
- Private inflow removal;
- Rehabilitation of off-road sewers, including raising manholes one foot above the flood line, manhole lining, and installing bolted and gasketed manhole covers;
- Rehabilitation of pipe and manhole defects using grouting and lining; and
- Annual maintenance to clear easements, inspection the siphon, and evaluate manhole conditions.

A summary of pump station and Collection System capital upgrades and capacity improvements is provided in Appendix F. Projects implemented include the following:

- Acquisition of a grout truck and sealing of pipe joints,
- Installation of a 36-inch diameter relief sewer from Frederick Street to Broad Street Pump Station,
- Upgrading capacity at Broad Street Pump Station, and
- Improving manholes (including locking covers) along East Main Street to reduce inflow.

Some manhole upgrades to reduce I/I have resulted in operational issues: locking covers are bolted with dissimilar metals, resulting in metal corrosion and difficult-to-remove bolts; and plastic inserts inside manhole covers raise the lids, resulting in plow impacts.

The City has had success in using solids manhole riser rings rather than adjustable rings. Installation and up-front cost is a little higher, but the solid rings are sturdier and are better at preventing inflow.

Facility representatives stated that Weston & Sampson has encouraged them to, in the future, perform targeted metering studies rather than City-wide monitoring.

City representatives stated that have sent letters out to residents upon becoming aware of private sources of inflow and infiltration. An example letter is provided in Appendix G. The City did not have records available of the number of private inflow connections removed.

The inspectors stated that the City may want to consider adopting a program to address private inflow at the time of property transfer. Such a program would likely require additional ordinances, but may be helpful for addressing private inflow, and even lateral condition, in the long run. The inspectors sent an email on August 16, 2018, identifying

example language that other municipalities have adopted to reduce I/I through property transfer ordinances.

V.F. Collection System Cleaning

The City has two combination jetting and vacuum trucks, as well as rodding equipment.

The City has areas where pipes received frequent preventative cleaning: the “six-week list,” the “six-month list,” and the “yearly list.” In addition, the area near the hospital is cleaned weekly.

Other areas are cleaned on a less frequent basis, with regular rotations between sewer subareas. Subareas are cleaned from upstream to downstream. Sewers are not always vacuumed during cleaning. A shovel is used to collect when small amounts of debris are present; the vacuum is used when large amounts of debris are present.

V.G. Collection System Condition Assessments

The City’s grout truck has a Closed-Circuit Television (“CCTV”) inspection system. Videos are stored electronically using the on-board software and defects are logged in reports. City representatives were not familiar with the Pipeline Assessment and Certification Program standard defect coding prepared by the National Association of Sewer Service Companies.

Typically, sewers are inspected before cleaning.

The Inspectors observed the City’s CCTV and grouting truck. An investigation was being performed on Rollinson Street in response to an observed sinkhole on the road surface. The City uses Granite XP software to document CCTV observations. A sag was observed in the line on Rollinson Street. The sag was not logged in the operator’s report due to the inspection being targeted towards indicators of the sinkhole being caused by the Collection System. The operator stated he could tell that the sinkhole was not due to the Collection System because there were no cracks apparent along the crown of the pipe.

V.H. Collection System Rehabilitations

The City has focused on sewer Subarea 1 in the northeast portion of the City. Although the sewer assets are not as old in this area as in the central area of the City, groundwater is high and a large amount of I/I is present. A summary of grouting work through August 2015 is provided in Appendix H.

City representatives stated that they had planned to purchase a second grouting truck, but now feel that the money is better spent on contracting out sewer rehabilitations.

The City has not performed any metering studies to evaluate the effectiveness of its grouting program.

The City has performed slip lining (Cast-In-Place Pipe) in several locations.

At Rollinson Street, the operator displayed the equipment used for grouting. Photographs from the inspection are provided in Appendix I. Photo 1 shows the “packer” used to test pipe joints and inject the grouting chemicals, if needed. Bladders inflate at each end of the packer and the integrity of each joint is tested. Photo 2 shows the mixed grout prepared in a cup. The operator stated that the mixture takes approximately 15 to 18 seconds to cure. The resulting cured grout has a firm gelatinous texture.

Facility representatives stated that the Highway Department coordinates with WPC on road resurfacing. When road resurfacing is planned, WPC investigates the condition of sewer assets and makes any necessary upgrades before road resurfacing is completed.

The City has \$200,000 budgeted for rehabilitations to manholes in a state highway.

V.I. Collection System Bypasses

Appendix J displays the City’s Collection System Bypasses (a.k.a. SSOs) reported to CT DEEP from July 1, 2013, through June 30, 2018.

The City had ten SSOs during the review period. Two of the SSOs reached surface waters. A volume was reported for only one of the discharges to surface waters. In April 2014, approximately 1,500 gallons was discharged to the Pequabuck River due to blockages. In July 2013, an unknown volume was discharged to Coppermine Brook due to a blockage.

The City verified that the 10,000-gallon SSO in December 2014 at Bristol Commons did not reach surface waters.

All SSOs were caused by blockages. Where causes of blockages were provided in reports to CT DEEP, three were due to grease and two were due to roots. During the inspection, facility representatives stated that rags had also been the cause of blockages. The City has investigated causes of rags – sources include mechanics’ rags and sanitary wipes. The City has performed public outreach for ragging issues, including sending letters to child care facilities, nursing homes, and the hospital.

V.J. Cross Street Pump Station

The inspectors and facility representative visited Cross Street Pump Station (Photo 3). Flow comes to the pump station from an off-road sewer to the north and from the Lake Avenue Pump Station to the south. The off-road sewer easement was well-cleared (Photo 4). The wet well had submersible pumps; flow from the gravity main into which the Lake Avenue Pump Station discharges was observed (Photo 5). Mr. Vontrell stated that the pump station has two pressure transducers to detect water levels, but that the City was considering adding an ultrasonic sensor due to reliability issues with the pressure transducers. Float sensors were also present that serve as a back-up.

Mr. Vontrell stated that full inspections of the pump stations are done once per month and pump stations are visited at least once per week.

A connection for bypass pumping was observed (Photo 6).

A touchscreen PLC was observed (Photo 7). The controller is connected to the City's SCADA and can be monitored and controlled from the WRF. One alarm that the City monitors the amount of time for which a pump cycles on. Other alarms are activated if the pumps are drawing too little or too much power. Alarms can be acknowledged at the WPC without resolving the underlying alarm, but the unresolved alarms remain in a list in the SCADA. Some alarms cannot be resolved without visiting the pump station. In addition to being logged electronically, some alarms are logged in the operators' log book.

A totalizer is present, logging current and total flow (Photo 8).

V.K. Drayla Drive Pump Station

The inspectors and facility representative visited Drayla Drive Pump Station (Photo 9). Drayla Drive Pump Station is the smallest pump station in the City in terms of flow and the only pump station not to have on-site back-up power.

A quick-connection to back-up power was observed (Photo 10).

The pump station had the old style of PLC with no on-site digital display. Back-up batteries for the PLC and radio link were observed.

The wet well was observed (Photo 11). Facility representatives stated that confined space entry of the wet well was not very difficult since the drop was straight. Crews have a blower they bring on-site to ventilate the pump station before entry.

V.L. Broad Street Pump Station

The inspectors and facility representative visited Broad Street Pump Station (Photo 12). The pump station is approximately 200 feet south of the Pequabuck River. The pump station was upgraded in 2010 - 2011.

The pump station has two on-site generators, a 300-kilowatt unit built in 1986 and a 500-kilowatt unit built in 2010. The pump station has two large pumps and two small pumps. The 2010 generator is sufficient to operate the two large pumps and one small pump simultaneously. The 1986 generator is sufficient to operate one large and one small pump simultaneously. Preventative maintenance is planned for the 1986 generator to upgrade the alternator and control panel. A generator of similar type and vintage at the WRF had an alternator failure.

A diagram on the electrical panel displays the flow of utility power and back-up power (Photo 13).

A flood shield is observed to be installed on the door in the event of flooding from the Pequabuck River (Photo 14). The bottom of the air louvres appears to be of only a slightly higher elevation than the door threshold.

The pump station has two force mains, colored green and blue (Photo 15). Each pump can flow to either force main.

A high-pitched noise was observed, but no excessive vibrations were observed. Red wires were observed that connect to vibration monitoring devices.

The pumps purge air automatically. Some water is discharged onto the floor of the dry well in this process. A sump pump collects water on the floor.

The facility has very deep wet wells and cannot be cleaned using the combination truck, as is done at other pump stations. The Broad Street Pump Station wet well is equipped to be self-cleaning. Dark blue valves were observed that direct wastewater from the force main back into the wet well at a high pressure to clean the wet well.

Broad Street Pump Station is inspected once or twice a shift, i.e., three to six times per day.

Bypass pumping is not feasible at the Broad Street Pump Station, due to its size.

The pump station is equipped with two influent channels, a main channel and a bypass channel used during maintenance (Photo 16). The main channel has a bar rack with an automatic rake. The rake brings solids to a “Taskmaster” grinder (Photo 17).

V.M. East Main Street Pump Station

The inspectors and facility representative visited East Main Street Pump Station (Photo 18). The pump station is approximately 150 feet south of the Pequabuck River. Following flooding in 2011, a berm was constructed around the generator and wet well hatches (Photo 19).

Flow is directed from East Main Street Pump Station to the Broad Street Pump Station.

A vent pipe doubles as a bypass pump outlet (Photo 20).

The pump station has a touch screen control panel and submersible pumps.

The on-site generator is older, but parts are readily available.

V.N. Customer Service Requests and Bypass Reporting

The facility representatives described the process by which the City responds to reports of Collection System problems.

WPC’s telephone number is posted on its website. DPW receives sewer calls as well, which as referred to WPC. The City has a Citrix work order system into which customer service requests are entered and tracked.

During business hours, the operator on-duty who receives the call dispatches the Road Crew to respond with a combination vac/jet truck. After business hours, the operator

investigates the incident first and then calls in the combination truck as necessary. The operator alerts the Water Department that he is leaving the WRF and checks back in upon his return. Operators responding to an incident alone carry a “man down” radio that automatically calls the Police Department if it is in a tilted position for an extended time.

All staff are trained in addressing backups. The Police Department is available on-call for traffic control, as necessary.

The combination truck is equipped with map books. Staff in the WRF typically are in radio contact with the Road Crew during incidents to provide manhole location information using detailed maps available in the WRF.

Example customer service requests observed in the operator’s log book were reviewed by the Inspectors and discussed with the facility representatives. Events were noted in the log book on Divinity Street on January 29, 2018, and on February 8, 2018. Notes provided with these events stated, “Not ours.” Facility representatives stated that stoppages used to be logged on the small forms shown in Photos 21 and 22, but stated that the City was moving towards larger forms that allow for more detailed information. The entry dates written on the top of the form reflect the dates on which the information was entered into the Collection System O&M Access Database.

Basement backups are reported to the City’s Health Department.

The Inspectors visited the Operations room in the WRF where the lead operator sits. A customer service request had been received on the morning of the second day of the inspection (July 25). A larger form than forms reviewed for the January 29 and February 8 events was used to log the complaint. The operator stated that the complaint had been for odor, but he had received verbally from the Road Crew that nothing had been observed upon investigation.

The City uses Assessor’s maps, GIS maps, and design plans stored in the Operations room to assist the Road Crew.

The Inspectors observed that some entries in the operators’ log book were completely scribbled out. The Inspectors stated that the preferred method for making corrections is to cross out with a single line and then initial.

V.O. Fats, Oils, and Grease (“FOG”) Control

The City’s Health Department and WPC cooperate to enforce the City’s FOG ordinance. The Health Department includes FOG in its regular inspections of every Food Service Establishment (“FSE”), while the WPC does enforcement and performs spot-checks for FOG compliance. FOG spot checks are informed in part by observations made during cleaning operations.

The City initiated an enforcement action with a proposed fine against a FSE for not maintaining an indoor grease recovery unit. It was later determined that the FSE also had an outdoor passive grease trap.

V.P. WRF Phosphorus Removal and Disinfection Systems

The Inspectors and facility representatives toured the recently-installed phosphorus removal and disinfection system.

The Ultraviolet disinfection system has a counter-weighted gate at its outlet (Photo 23).

The ActiveFlow phosphorus removal system operates by coagulating and settling phosphorus using chemical additions. A small amount of alum is added before the aeration basins in the secondary treatment system and a larger amount of alum plus sodium hydroxide are added in the tertiary treatment system mixing chamber. Alum acts as a coagulant and sodium hydroxide raises the pH. Then, sand and polymer are added in the tertiary treatment system maturation chamber. Finally, solids are removed in a tertiary clarifier with a honeycomb baffle (Photo 24).

V.Q. Effluent Limit Violations

Facility representatives described the issues that lead to two monthly average violations for total phosphorus in 2017. The system was not completed in time to allow for operation for July 2017, the first month for which the facility's phosphorus limit of 0.14 milligrams per liter was in effect. Then, in October 2017, the last month in calendar year 2017 of the seasonal limit, the facility ran out of treatment chemicals during high flows that occurred at the end of October.

Facility representatives stated that they believe an industrial user is discharging soluble non-reactive phosphorus that is not amenable to treatment.

In January 2017, the facility had a monthly average violation for total suspended solids. In May 2017, the facility had a monthly percent removal violation for total suspended solids. Facility representatives stated that the WRF went into winter with a low quantity of Mixed Liquor Suspended Solids and encountered settling issues during cold weather.

In May 2014, July 2014, and December 2014, the facility had monthly percent removal violations for carbonaceous oxygen demand. The Inspectors asked if the cause of the violations was low influent concentrations due to I/I. Facility representatives stated that influent concentrations were indeed low, but that they were low in dry years as well as in wet years.

Facility representatives stated that their low influent concentrations may be related to their industrial users. A Covanta waste-to-energy plant uses the City's effluent as its cooling water and returns the effluent to the WRF headworks. ESPN headquarters is in Bristol and may have large amounts of cooling water discharges for its electronic equipment. The facility has investigated bringing in brewery waste or using "MicroC" as additional sources of carbon. Carbon addition would also assist in the facility's nitrogen removal treatment.

Facility representatives stated that they have observed nocardia filamentous bacteria, due to their dilute influent.

The facility's daily maximum nickel violations were not discussed; the most recent was in December 2014.

V.R. Closing Conference

On July 25, 2018, at approximately 13:00, the Inspectors held a closing conference with the facility representatives from the opening conference plus Carol Noble of the City's Engineering Department.

The Inspectors provided the following initial feedback on the facility's compliance:

- The City may want to consider reallocating the money from capacity upgrades upstream of the Broad Street Pump Station towards I/I reduction;
- The City may have outstanding issues, such as private inflow reduction and off-road sewer asset upgrades from its 2011 SSES, that should be addressed; and
- The City may want to consider additional metering studies to ensure its I/I program is addressing the biggest removal per dollar.

The Inspectors said that an inspection report would be provided to the facility within 60 days.