UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Drafted Date: July 8, 2022
Finalized Date: *Dated as shown on electronic signature*

Subj: Inspection Report
Clean Water Act - National Pollutant Discharge Elimination System ("NPDES")
City of Bridgeport

From: Rachel Olugbemi, Physical Scientist

Rachel Olugbemi
Digitally signed by RACHEL OLUGBEMI
Date: 2022.07.20 14:55:29 -04'00'

Thru: Jack Melcher, Environmental Engineer

To: File

I. Facility Information

A. *Facility Name:* City of Bridgeport

B. *Facility Location*: 695 Seaview Avenue
Bridgeport, CT 06607
GPS coordinates: 41.172214, -73.174261

C. *Facility Contacts:* Lauren McBennett Mappa, P.E.
General Manager, Water Pollution Control Authority
Phone number: 203 332 5605
Lauren.McBennettMappa@Bridgeportct.gov

D. *NPDES ID No(s).:* CT0101010, CT0100056

II. Background Information

A. *Date(s) of inspection:* June 28 and June 29, 2022

B. *Weather Conditions:* sunny, 80 to 85 °F

C. *US EPA Representative(s):*
Rachel Olugbemi, EPA inspector
Jack Melcher, EPA inspector

D. *Connecticut Department of Energy and Environmental Protection ("CTDEEP") Representative(s):*
Susan Unger, CTDEEP inspector
Craig Motasky, CTDEEP inspector

E. *Federally Enforceable Requirements Covered During the Inspection:*
NPDES Permit No. CT0101010, effective May 1, 2021
NPDES Permit No. CT0100056, effective July 1, 2019
Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a)

F. *Previous Enforcement Actions:*
Order on Consent Docket No. CWA-AO-R01-FY16-04, issued by EPA on August 25, 2016
Order No. AOWRMU21003, issued by CTDEEP on December 16, 2021. This Order superseded and replaced Order No. AOWRMU19001 and Order No. WC5498.
Order No. AOWRMU18002, issued by CTDEEP on June 14, 2018

III. Type and Purpose of Inspection

EPA performed an inspection of the City of Bridgeport's separate sanitary sewer system to collect information regarding the City's programs for preventing Sanitary Sewer Overflows ("SSOs") also known as "bypasses" in the State of Connecticut's regulations, minimizing Infiltration and Inflow ("I & I"), responding to emergency situations, and reporting basement backups as required by the City's NPDES Permits No. CT0101010 and CT0100056. EPA performed the inspection in response to a complaint that alleged basement backups of municipal sewage occurring during storm events within the residential area adjacent to Island Brook e.g., Chopsey Hill Road, Pond Street, Woodrow Avenue, Saunders Avenue, Summit Street, and Slawson Street.

IV. Facility Description

The City of Bridgeport (the "City") has two Publicly Owned Treatment Works ("POTWs"), each consisting of a Collection System and a Water Pollution Control Facility ("WPCF"). Both Collection Systems include separate sanitary sewers, combined sanitary wastewater and stormwater sewers, and combined sewer overflow ("CSO") outfalls. The City's Water Pollution Control Authority ("WPCA") operates both POTWs through its contractor Inframark. According to the City's Capacity, Management, Operation, and Maintenance ("CMOM") Corrective Action Plan, the POTWs serve a total population of approximately 175,000, which includes the Town of Trumbull as well as portions of the Towns of Fairfield and Stratford (see Appendix A.1).

V. Inspection

Ms. Olugbemi announced the inspection to the facility on June 1, 2022 via email (see Appendix A). The email provided the inspection's purpose, a tentative agenda, the CMOM Corrective Action Plan and CMOM annual report previously submitted by the City, and a list of documents to be provided in advance via email if possible.

Prior to the inspection, Ms. Mappa provided numerous documents by email (see Appendix B). Printed copies of the documents were provided to the Inspectors for use during and after the inspection.

Ms. Olugbemi and Mr. Melcher (the "Inspectors") arrived at approximately 10:10 am on June 28, 2022. The first day of the inspection concluded at approximately 2:30 pm. The inspection resumed on June 29 at approximately 9:10 am. The second day concluded at approximately 10:55 am. Attendance sheets were completed on both days of the inspection because the attendees were different (see Appendix C).

A. Opening Conference

Ms. Olugbemi and Mr. Melcher presented their credentials to Ms. Mappa. Ms. Olugbemi explained the purpose of the inspection and how it was in response to a complaint that EPA had received. All attendees gave introductions.

B. Department of Health and Social Services

Ms. Olugbemi asked about the attendees' availability. Ms. Lehaney, the Deputy Director of Health and Social Services, had the shortest available time so Ms. Olugbemi began by asking her questions. Ms. Lehaney described activities of the Department of Health and Social Services ("DHSS") that overlap with WPCA. DHSS and WPCA together conduct mosquito control. DHSS and WPCA are involved in a cleanup of Bruce Brook, which involves clearing branches and litter. DHSS and WPCA both receive sewer-related complaints.

DHSS deals with housing and blight. When DHSS receives a complaint about a sewer back-up, a health inspector calls the WPCA field operator. When the complaint is related to housing, DHSS will conduct an inspection. Follow-up from the inspection can include relocating a tenant, suing the landlord in housing court, or issuing an order to a landlord to fix a problem if the landlord is responsible for a health nuisance. DHSS also can advise residents about sanitation following a sewage discharge into the home.

DHSS conducts restaurant inspections to evaluate food safety but does not evaluate compliance with the Fats, Oils, and Grease ("FOG") program.

DHSS is responsible for oversight of design, installation, testing, and repair of septic systems. DHSS is responsible for well drilling permits but not for well sampling. Ms. Mappa estimated that there were fewer than 12 each of septic systems and wells in the City.

DHSS conducts weekly beach sampling on Mondays throughout the summer season to test water quality (see Appendix B.9). This includes sampling at Lake Forest's swimming area. This is done in collaboration with the Connecticut Department of Public Health's lab. If there is an exceedance, the beach is closed or the beach is resampled the next day. Beaches are closed automatically after storms.

Ms. Lehaney then departed.

C. Department of Public Facilities

Ms. Olugbemi then asked questions of the Department of Public Facilities ("DPF"), to make the best use of their time. DPF's funding comes from the general budget, while WPCA is funded by ratepayers. DPF conducts road paving and addressing roadway issues such as sink holes. DPF deals with flooding issues related to overflowing streams. DPF is involved with coastal resiliency efforts in the Seaside neighborhood of the City. DPF operates in the field daily and provides additional eyes on the City's streets. The Engineering department is within DPF. DPF and WPCA frequently coordinate and exchange calls. For example, DPF notifies WPCA when a paving project is planned for an area and WPCA will inspect sewers and coordinate sewer repairs with the paving project.

DPF conducts street sweeping using six street sweepers that are out daily. Waste is taken to a dump. DPF does not track the number of miles swept. Reps stated that the City conducts a large amount of street sweeping and that the City has a problem with litter and trash. DPF does not track the amount of material collected by the street sweepers. DPF questioned how this information could be tracked, whether every truck would have to be weighed. Ms. Olugbemi stated that one option is to track volume instead of mass. For example, DPF could track how many truck-fulls of material get taken to the landfill, then multiply by a rough estimate of the mass or volume of the truck.

DPF gets complaints. DPF stated that it is the property owner's responsibility to maintain the tops of the catch basins, but DPF may help to rake away debris. Prior to storms, DPF will rake off the tops of catch basins. DPF may also place sawhorses as road barriers to stop traffic in flooded areas. Mr. Nadrizny stated that the City is very flat, which contributes to storm-related flooding.

D. Resident's Complaint to EPA

Ms. Olugbemi summarized the alleged incidents described in the resident's complaint: Island Brook floods the surrounding residential area during storm events; floodwaters enter sewer lines and cause basement back-ups; and these conditions are aggravated by water from upstream Lake Forest's dam.

Ms. Mappa stated that the WPCA had not received any calls similar to the complaint. Ms. Mappa stated that it is against the City's code to have a bathroom in a basement. WPCA cannot enforce this code, although DHHS has authority to take property owner's to housing court. Ms. Olugbemi asked whether the area was separate or combined, considering the two combined sewer overflow ("CSO") outfalls listed in the 2021 CSO report as discharging to Island Brook (see Appendix D). Ms. Mappa stated that the two CSOs are far downstream, and that all sewers are separated in the residential area adjacent to the portion of Island Brook being discussed. Ms. Mappa mentioned the nearby River Street pump station (see Appendix B.1). Ms. Olugbemi asked about the age and condition of the sewers in the residential area. Ms. Mappa said she could follow up with this information. Ms. Olugbemi asked about Infiltration and Inflow ("I & I"). Ms. Mappa stated that I&I was not a problem in Bridgeport but a problem in Trumbull (see

Appendix B.7). Ms. Mappa stated that manholes in the combined system pop during heavy rain events.

Ms. Olugbemi asked Mr. Danicle, the Engineering Department representative, about a project proposal to mitigate Island Brook's flooding (see Appendix E). Mr. Danicle stated that the proposal was just a conceptual design. The City was in the stage of applying for a FEMA grant. The City was in progress on a project to mitigate flooding along Ox Brook. Mr. Danicle stated that finances are an issue due to a tight budget; the houses in the residential area being discussed have property values that are small in comparison to the cost of flood mitigation projects. Ms. Olugbemi asked about the Lake Forest dam. Mr. Danicle said the dam could handle a hundred-year storm event. The dam was periodically opened to a downstream lake, based on storm events. The dam is privately owned by the Lake Forest Association who coordinate with CTDEEP.

Mr. Craig Nadrizny and Mr. Danicle departed.

E. Water Pollution Control Authority and Inframark

Ms. Olugbemi asked about the relationship between Inframark and WPCA. Reps stated that Inframark is a contractor working under the WPCA. The WPCA, through Inframark, conducts operations and maintenance ("O&M") of the City's sewer Collection Systems and Municipal Separate Storm Sewer System ("MS4"), which includes cleaning 8,500 catch basins annually, inspecting lines using CCTV, cleaning lines, checking CSO regulators, and sampling MS4 outfalls.

Ms. Olugbemi asked about the field staff. Mr. Lavoie said that field operators have extensive knowledge of the system and commended the staff. There is minimal staff turn-over. The staff is 24 field operators, 4 mechanics, and 1 dispatcher for a total of 29. The equipment includes digging equipment, CCTV equipment, clam trucks, and jetting-vacuuming trucks. Pump stations are operated by a separate crew. Ms. Olugbemi asked about the size of the staff. Reps said the staff size was sufficient.

F. Collection System Maintenance

Ms. Olugbemi asked what percent of the total sewer system is cleaned annually. Reps stated that there was no way to know. Ms. Olugbemi asked how frequently each sewer line is cleaned. Reps stated that they do not track frequency. Ms. Olugbemi asked how they make sure that every area gets cleaned and that they are not cleaning the same area multiple times. Mr. Lavoie stated that operators systematically clean each section of the City's sewers to avoid overlapping cleaning.

The Inspectors looked at the list of locations to be maintained, also known as the preventative maintenance list (see Appendix B.2). Ms. Olugbemi asked how the list is used. Mr. Gomes said that operators go down the list and after they clean a location on the list, they write the date on the list next to that location. In addition, operators fill out a field report and Doreen the dispatcher inputs the field report into a database. Ms. Olugbemi asked how frequently the locations are cleaned. Mr. Gomes stated that operators clean locations as frequently as possible. Ms. Olugbemi clarified, are locations cleaned perhaps annually or bi-annually? Mr. Gomes stated that operators do not track maintenance frequency.

Locations are added to the preventative maintenance list as needed. Representatives do not track the date that a location is added to the list. Ms. Olugbemi asked why these locations need more maintenance. Ms. Mappa stated that the main issue is grease from households, with some areas worse than others.

Ms. Olugbemi asked how the list is related to capital improvement such as pipe replacement. Operators stated that the list is for preventative maintenance and is not related to pipe replacement. Ms. Olugbemi asked about long-term solutions for these locations. Reps stated that there is a quarterly meeting between Inframark and WPCA, during which they decide which pipes to line or replace. Locations are removed from the list after a pipe has been rehabilitated. Representatives do not track the date that a location is removed from the list or how many locations have been removed.

G. Complaint Response Procedures

Ms. Olugbemi asked how complaints come in (email, Item 3). Reps stated that complaints can come in through the SeeClickFix website but mostly come through the phone. Ms. Olugbemi asked what the process is for responding to a complaint. Reps stated that, during business hours, Doreen the dispatcher, after receiving a complaint, will log it in the call log. She will then call one of the two supervisors. A supervisor will then go out to inspect the area. If needed, the inspector will call up a crew. The operators will check the sewer main. The homeowner will be informed either in person or on the phone of whether the issue appears to be in the private lateral or in the City's main. If the complaint is about a sinkhole caused by an issue with a private sewer lateral, the WPCA will send a letter to the landlord notifying them of the need to fix it. Landlords are generally good about fixing it and the WPCA does not have authority to issue an order. Outside of work hours, calls forward directly to an on-call supervisor. Doreen the dispatcher usually gets information about the event on the next workday. Ms. Olugbemi asked if there was a formal, written procedure or SOP for responding to complaints. Reps responded that no, there was not an SOP.

Reps reiterated that they were dealing with a paper system. Ms. Olugbemi mentioned some disadvantages of a paper system, for example that it made finding information more difficult and that sometimes handwriting is hard to read. Reps stated that a formal computerized tracking system would be time-consuming. Ms. Mappa pointed at the huge stack of complaints from just one calendar year and stated that operators were already very busy dealing with so many complaints. Ms. Olugbemi stated that a computerized system might actually save time by helping to make things more efficient. For example, a computerized system might make it easy to tell which areas had complaints most often and therefore need increased cleaning frequency or pipe replacement.

H. Complaint Records Review and Sanitary Sewer Overflows ("SSOs") Reporting

Complaint records consisted of a handwritten call log accompanied by the corresponding handwritten Complaint Memoranda (see Appendix B.3.i). Ms. Olugbemi mentioned the numbers in the annual Capacity, Management, Operation, and Maintenance ("CMOM") report of over 800 total calls and over 300 alleged backups in calendar year 2021 (see Appendix A.2). Ms. Olugbemi asked where these numbers came from, whether they came from a database. Ms. Mappa said that no, most likely Doreen the dispatcher had simply counted up the entries in the call log. Ms. Olugbemi asked what "system backup" in the annual CMOM report refers to; is this when sewage exits the sewer system via a manhole or a basement? Ms. Mappa said "system backup" just means that the level of water in the sewer is up, or that the sewer is not flowing downstream.

Ms. Olugbemi observed "backup" noted repeatedly in the call log. Ms. Olugbemi asked, when a resident calls the WPCA and then Doreen the dispatcher writes down "backup," what does this refer to; is this when sewage exits the sewer system and enters a resident's home? Ms. Mappa said that "backup" might mean a homeowner is experiencing slow drainage and just using the term "backup" in order to get a fast response from WPCA. Ms. Olugbemi asked how WPCA responds when a resident has sewage entering their home due to an issue in the municipal sewer line. Ms. Mappa was unsure that such an event had occurred.

Ms. Olugbemi asked about an event recorded as occurring at 720 Connecticut Avenue on December 22, 2021, which mentions sewage coming up through sidewalk bricks. Mr. Lavoie stated that he himself did not recall the incident, and if necessary, he could call up the operators who were present but they likely would also not recall the incident. Mr. Motasky stated that, ideally, the records would be able to answer all questions so that there would not be a need to recall events. Reps stated that, if the issue was present in the main line then the sewage would have been coming up through the manhole; since the sewage was instead coming up through the sidewalk, then the issue was with the private lateral. Ms. Olugbemi asked if there was a formal, written procedure or SOP for evaluating potential SSOs. Reps responded that no, there was not an SOP.

Ms. Olugbemi observed that it was difficult to definitively conclude what occurred solely from reading an incident's description in a Complaint Memorandum. Mr. Motasky stated that, ideally, the records would not have any ambiguity and that anyone would be able to read the records and draw the same conclusion without making any assumptions or being familiar with the system.

Ms. Olugbemi asked about an event recorded as occurring at 98 Foster Square on March 24, 2022. Ms. Olugbemi noted that this location had submitted multiple complaints (see Appendix F) and was on the preventative maintenance list (see Appendix B.2). The complaint described sewage in a resident's home, with descriptions of field operators clearing the sewer main. Ms. Olugbemi noted that this appeared to be a reportable basement backup. Reps stated that they were not aware of the requirement to report basement backups.

Ms. Unger expressed uncertainty about whether basement backups are reportable bypasses. Mr. Melcher assured her that basement backups due to problems in the City's main are reportable bypasses. Ms. Mappa explained that she understood "bypass" to mean a planned piped bypassing of a portion of the plant or collection system. Later during the inspection, Ms. Unger read aloud the State of Connecticut's definition of "bypass" found at Regulations of Connecticut State Agencies (RCSA) §22a-430-3-a-3 to clarify what the term "bypass" means under the State's regulations.

Reps questioned their ability to verify that a basement backup had actually occurred. Reps stated that they did not have the authority nor insurance coverage to enter private residences. Reps stated that there was not enough information in the SeeClickFix reports (see Appendix B.3.ii). Reps again mentioned the City's ordinance forbidding bathrooms in basements and questioned the City's responsibility for basement backups. Reps mentioned that no insurance claims had been made against the City related to sewage back-ups (see Appendix B.8). The Inspectors clarified that liability in an insurance claim was different than the City's requirement to report basement backups caused by the City's sewers.

Ms. Olugbemi asked about an SSO reported to CTDEEP at 55 Stoehrs Place on September 2, 2021. Ms. Olugbemi asked why there was no information about this event in the records that the City had provided in response to the email announcing the inspection (see Appendix B.5). Ms. Mappa stated that the email had asked about bypasses, not SSOs. Ms. Olugbemi asked why the SSO was not mentioned in the CMOM annual report. Ms. Mappa stated that she was not aware of the SSO so she had not included it in the CMOM annual report. Ms. Olugbemi noted that she only knew about the SSO because of the CTDEEP database, and that there was no mention of the SSO in any of the City's records. Ms. Olugbemi asked whether possibly reported SSOs were kept separately. Ms. Mappa stated that no, there was no separate place.

Ms. Olugbemi asked about an event that occurred on Reservoir Ave on February 10, 2021. Doreen's call log said that water was coming out of a manhole. Two Complaint Memoranda were provided for the event: one by Mark P. and one by Ken and another operator. Ms. Mappa stated that it is not typical for two Complaint Memoranda to be completed for a single event, but in this case both the supervisor and the operators had completed Complaint Memoranda. Ms. Mappa stated that the Complaint Memoranda's field report section did not indicate that water was coming out of the manhole, leading her to believe that sewage was not actually released from manholes and that an SSO did not occur. Mr. Lavoie said that there are other potential causes of water being present on the street that have nothing to do with sanitary sewers. For example, water could be released from a drinking water meter.

Ms. Olugbemi asked about an event that occurred at West Taft on March 22, 2021. The Complaint Memorandum states that a bypass report was filled out and a supervisor named John was notified. Ms. Olugbemi had checked CTDEEP's database and had not seen the event. Ms. Olugbemi asked whether it was possible that the bypass report had not been submitted. Ms. Mappa and Mr. Motasky stated that CTDEEP's database has had issues.

Ms. Olugbemi asked about the procedure for responding to reportable bypasses. Reps stated that the operator fills out a bypass report, send it to the supervisor, and then a supervisor such as John notifies DEEP. Ms. Olugbemi asked if there was a formal, written procedure or SOP for responding to reportable bypasses. Reps responded that no, there was not an SOP.

Ms. Olugbemi asked about numerous entries in the call log that do not have an attached Complaint Memorandum. Reps stated that the field operator might have gone out and observed that the issue was not a WPCA issue, for example a broken water main or a sink hole, and thus did not fill out a field report. Mr. Motasky suggested having documentation to show that the call had been resolved. Reps stated that there may be an issue with Complaint Memoranda completed outside of business hours, such as on weekends or at night, not being inserted. Reps stated that many calls are received that are not related to the WPCA and these calls are not typically logged.

Ms. Olugbemi asked why only some of the work being conducted was recorded in electronic format. Ms. Mappa stated that the electronic database was only used for field reports created as part of preventative maintenance, and was not used for Complaint Memoranda created in response to calls.

Ms. Mappa expressed frustration with the inspection. Ms. Olugbemi expressed the importance of repeated questioning to ensure a thorough and accurate inspection report.

I. Emergency Response Procedures

Ms. Olugbemi asked about emergence response procedures. Reps stated that calls are responded to usually within 20 minutes and always within one hour. Ms. Olugbemi asked if there was a formal, written procedure or SOP for responding to emergency situations. Reps responded that no, there was not an SOP.

Ms. Mappa asked whether EPA had authority to require an emergency response plan. Ms. Olugbemi answered the question; she stated that EPA had done so for other municipalities where unpermitted discharges of sanitary sewage had occurred.

Ms. Olugbemi asked if field operators were trained in how to respond to emergency procedures. Mr. Lavoie stated that operators receive many trainings annually and that these trainings are logged but that he did not have such records presently at hand. However, he could provide them after the inspection if requested.

J. Catch Basin Management

Ms. Olugbemi noted that numerous complaints were about clogged catch basins (see Appendix F). Ms. Olugbemi noted that, although the inspection was not covering the MS4 permit, these complaints claimed that clogged catch basins were causing street flooding; the initial tip claimed that flooding was causing basement basements. Reps reiterated that the City has a problem with trash and litter. Ms. Olugbemi asked how the City ensures that catch basins are never more than 50% full. Ms. Olugbemi clarified that, as a requirement of the MS4 program, catch basins must never be more than 50% full. Reps stated that they did not track the level of material in the catch basins.

Ms. Olugbemi asked about the catch basin cleaning program more generally. Reps stated that an employee named Callahan runs the program. He has an extensive knowledge of the system. He is a clam truck driver. Catch basins are cleaned by section, much like the sewer cleaning. Each day, Callahan informs operators of the section to be cleaned and directs the four clam trucks in where to go. If a catch basin is problematic, it gets cleaned more than once a year, as required. Actions are taken in preparation for storms. Ms. Olugbemi asked how this was possible: if there are 8500 total catch basins in the system, and exactly 8500 catch basin cleanings take place each year, and every catch basin gets cleaned at least once, then how can some catch basins be cleaned more than once? Mr. Lavoie stated that this 8500 was the number of catch basin cleanings, not the total number of catch basins in the system. Ms. Olugbemi asked how many catch basins are in the system. Mr. Lavoie stated that this is not known. Ms. Olugbemi asked where the number 8500 came from. Mr. Lavoie stated that the number has been in place since at least 1997 and had been required by the State.

Ms. Olugbemi asked what happens to catch basin material. Reps stated that it is taken to the landfill. Ms. Olugbemi asked how much material is removed from catch basins each year. Reps stated that they could obtain the tonnage per month brought to the landfill, but this number also includes the amount of material removed from sewer pipes. Reps stated that they did not track the amount of material removed specifically from catch basins. Ms. Mappa stated that the program has urgency and limited staff. Ms. Olugbemi, trying to understand this statement, asked if the program was mainly reactive. Ms. Mappa replied that no, the program was not mainly reactive since it is also preventative, and referred to the preventative maintenance list.

K. Other Capacity, Management, Operation, and Maintenance ("CMOM") Topics

Ms. Olugbemi asked about the status of actions listed in the CMOM CAP. Ms. Mappa requested that a discussion of the CMOM CAP be done as a video call in the future, with CDM Smith present. Ms. Olugbemi agreed.

Ms. Olugbemi asked about asset identification. Reps stated that manholes and other assets are identified by their general location but are not yet numbered.

Ms. Olugbemi asked about a GIS system. Reps stated that, in the future, the GIS system will capture location information from trucks, but that this will not be for another two years. Reps stated that the GIS map is a City-wide project. The WPCA does not control the project. The WPCA just contributes to the project. The City has been working on it for four years and it will be completed within two years.

Ms. Olugbemi asked about sewer lateral inspections (see Appendix B.6). Reps stated that connections of laterals into the main were inspected after construction was complete and the locations were recorded by "pulling ties" from reference points.

The Inspectors looked at the maps of the sewers (see Appendix B.1). Ms. Olugbemi asked whether the maps were used to respond to "Call Before You Dig" requests. Ms. Mappa stated that yes, the map was used to mark locations of sewer lines within the public right-of-way.

Ms. Olugbemi asked about public outreach. Ms. Mappa said that the WPCA had tried posters and flyers to educate residents about grease but it had not helped. Issues were worsened during the pandemic due to wipes, masks, gloves, etc. Ms. Mappa stated that she had made an announcement during the Mayor's daily broadcast. The WPCA had success in reaching out to hospitals and getting them to reduce their use of "flushable" wipes.

WPCA conducts FOG inspections but only during installations or at new sites. Ms. Mappa stated that, since the Health and Fire Departments also do regular inspections at restaurants, they would call the WPCA about any issues. The WPCA has received no such calls in over three years.

Ms. Mappa mentioned that hydraulics had been modeled for use in the plant upgrades, and that the hydraulic model was used in housing development.

L. Closing Conference

Ms. Olugbemi explained the process following the inspection, that she would send the City an inspection report and they would have the opportunity to respond, and that there might be additional requests for information or further meetings.

Ms. Olugbemi summarized her preliminary findings. Ms. Olugbemi began with aspects of the O&M program that had been observed, for which she had no present concerns or comments. Ms. Olugbemi then went through areas of concern, which were mostly related to tracking, reporting, and creating standard procedures. Ms. Olugbemi noted the importance of standard procedures for the O&M program's efficiency, and that this had also been identified by CDM Smith as a need.

- Observations
    - The City conducts extensive catch basin cleaning and street sweeping activities.
    - The City conducts actions in preparation for storms.
    - The City conducts rapid emergency response, generally present on-scene within 20 minutes or up to an hour.
    - The City has a sizeable fleet and conducts numerous activities, despite a tight budget.
    - The City has extensive detailed paper maps of the Collection System.

- The City responds to Call Before You Dig requests.
- The City conducts inspections of new laterals.

- Further Observations
  - The City is engaged in a clean-up of Bruce Brook.
  - The City at times rakes the tops of catch basins, despite this being the property owner's responsibility.
  - The City has initiated efforts at flood control at Ox Brook.
  - The City uses a hydraulic model when considering new development.

- Areas of Concern
  - The City does not track how frequently sewers are cleaned, or how much of the total system has been cleaned each year.
  - The City does not track when a location is added or removed from the preventative maintenance list, or how frequently locations are maintained.
  - The City does not track the total number of calls received, as calls unrelated to the WPCA's work are not always tracked.
  - The City does not track how many total catch basins are in the system, how many catch basins have been cleaned each year, the level of material in each catch basin at the time of cleaning, or how much material is removed from catch basins each year.
  - The City does not track how many SSOs it has reported each year.
  - The City's call logs and accompanying Complaint Memoranda do not have enough information to definitively evaluate whether a reportable basement backup took place.
  - The City's SeeClickFix entries do not have enough information to definitively evaluate whether a reportable basement backup took place.
  - The City's Complaint Memoranda do not always accompany logged calls or dates listed on the preventative maintenance list.
  - The City's use of the term "system backup" in its annual CMOM report is ambiguous, as this term can refer to blockages in the sewer system verified by personnel, or to unverified issues alleged by residents.
  - The City does not report all SSOs (also known as "bypasses" in the State of Connecticut's regulations).

- The City does not have formal, written procedures or SOPs for documenting complaints, responding to emergency situations, evaluating whether an SSO occurred, or reporting SSOs.

As Ms. Olugbemi was going through the above list, reps made comments.

Mr. Lavoie stated that they attempt to clean the entire system every 10 years, and estimated that 12-14% of the total system is cleaned each year, with 2-3% overlap each year.

Mr. Lavoie mentioned that he had participated in inspections at other facilities by other EPA inspectors from other EPA regional offices, and that typically, after the inspection there would be an inspection report with a list of preliminary findings and areas of concern, with a request for the facility to respond back with actions it had taken to address the areas of concern. Ms. Olugbemi stated that, yes, that was the overall procedure, although it was not clear yet what the follow-up from the inspection would be, whether there would be such a request, but that the reps were always welcome to submit a response to the inspection report.

Ms. Mappa described feeling misled during EPA's 2019 inspection, in particular the involvement of lawyers after the inspection. Ms. Olugbemi stated that, she did not want Ms. Mappa to feel misled, that she could not make any promises about what would happen after the inspection, and that there was the possibility of more follow-up or the involvement of lawyers. Mr. Motasky noted that, for CTDEEP, decisions about follow-up were made in consultation with supervisors. Ms. Olugbemi agreed that EPA inspectors also consulted with supervisors before deciding the follow-up from an inspection.

Ms. Olugbemi mentioned that WPCA was tracking the number of calls that were considered relevant to the WPCA and worth responding to, not the actual total number of calls that were coming in. Ms. Mappa questioned the relevance of this number. Ms. Olugbemi responded that, this metric was listed on the CMOM checklist and is a good metric to track generally. Ms. Olugbemi said that, for example, if the WPCA is getting lots of calls that are unrelated to the WPCA's work, then those unnecessary calls could be swamping the dispatcher, and could indicate a need for public outreach about the WPCA's role.

Mr. Melcher read out loud from the cover letter to the CMOM Corrective Action Plan dated June 30, 2020: "WPCA acknowledges that basement backups caused by issues in the city owned collection system are unauthorized discharges." Mr. Melcher pointed out that the letter had been signed by Ms. Mappa. Mr. Lavoie said that the City would begin to report backups into basements caused by issues in the main line.

Mr. Lavoie said that City was considering updating its system for logging customer complaints and field reports, including standardized language to describe issues. Mr. Lavoie acknowledged a need to improve record keeping of customer complaints and responses, but stated that it was not productive to dwell on problematic reporting in the past, as this is a known issue. Mr. Lavoie stated that changes would be made going forward, in response to the preliminary findings. Ms. Olugbemi thanked participants for their time and the submission of the records.

The Inspectors then departed.

Unless otherwise noted, this report is based on records provided by the City, observations made by the EPA inspectors, and information supplied by City representatives as understood by the EPA inspectors. This report may not capture all operations or activities ongoing at the time of the inspection. This report does not make final determinations on potential areas of concern. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination. Nothing in this report affects EPA's authorities under federal statutes and regulations to pursue further investigation or action.

M. Appendices

A. Inspection Announcement Email
    1. CMOM Corrective Action Plan
    2. CMOM annual report
B. City's Responses
    1. Maps of the sanitary sewer infrastructure in the Island Brook area
    2. List of "Lines to be Routinely Maintained" with dates maintained for 2021 and 2022
    3. Calls and Complaints
        i. Call Log for Calendar Year 2021 with associated Complaint Memoranda
        ii. SeeClickFix Complaints from April 2021 through May 2022 with associated Complaint Memoranda
    4. Additional Complaint Memoranda
    5. Collection System bypasses (6/23/2022 email from Ms. Mappa)
    6. Inspections of Private Sewer Laterals
    7. Inflow and Infiltration Investigations (6/24/2022 email from Ms. Mappa)
    8. Insurance Claims against the City (6/27/2022 email from Ms. Mappa)
    9. Lake Forest sampling data for 2021 Bathing Season
C. Attendance Sheets
D. CSO Locations
E. Island Brook flood control project proposal
F. Additional SeeClickFix entries