



We Are Columbia

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March 31, 2017

BY U.S. MAIL TO:

Chief, Water Programs Enforcement Branch
Water Protection Division
U.S Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, GA 30303

Mr. Glenn Trofatter
SCDHEC-Bureau of Water
Water Pollution Control Division
2600 Bull Street
Columbia, SC 29201

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
Box 7611 Ben Franklin Station
Washington, D.C. 20044-7611
Re: DOJ No. 90-5-1-1-09954

BY ELECTRONIC MAIL:

Michael S. Traynham (traynhms@dhec.sc.gov)
Amy Gillespie (amy.gillespie@usdoj.gov)

Re: *The United States of America and State of South Carolina by and through the Department of Health and Environmental Control vs. The City of Columbia*
Civil Action No. 3:13-2429-TLW
DOJ Case Number 90-5-1-1-00954

Dear Sirs and Madams:

In the course of preparing the 2016 Annual Report, the City discovered that certain information was omitted from the 2014 Annual Report and the 2015 Annual Report. As discussed below, the SSO analyses in Section 4 of these Reports did not include SSOs identified during the October 2015 flood or Building Backups as defined in the Consent Decree.

As you are aware, the City experienced catastrophic flooding resulting from an unprecedented rainfall event which began on October 4, 2015. On October 4, 2015, the South Carolina Department of Health and Environmental Control (SCDHEC) instructed the City to suspend the verbal 24-hour notification of SSOs. On October 9, 2015, SCDHEC further instructed the City to suspend normal reporting until the response to the flooding was concluded. From

October 3, 2015, through October 13, 2015, the City staff maintained records of confirmed SSOs. However, during this time, large sections of the City's wastewater collection and treatment system were under water or inaccessible. Therefore, the City was unable to confirm all SSOs which may have occurred during this time period. Additionally, the City was unable to accurately evaluate the duration and volume of the SSOs which were confirmed. Since the normal reporting on the SSOs had been suspended during this time, the City identified "zero" wet-weather SSOs during October 2015 in Section 4 of the 2015 Annual Report. Despite the acknowledged incompleteness of the records for SSOs during and following the October 2015 flooding, the City has included this information in the analyses in Section 4 of the 2016 Annual Report and noted that the information provided is subject to the limitations described above.

With respect to building backups, the City does not maintain separate recordkeeping for these occurrences. When a customer notifies the City of a building backup, the City will investigate to determine whether the cause of the building backup is a condition within the City's system, and if so, correct the condition in the City's WCTS. The City staff do not enter private property to address building backups. For correction of a problem on a customer's property, the City refers customers to a third-party which administers the insurance program established to address these issues. Neither the City nor the third-party administrator have maintained records on the volume, duration, or specific cause of building backups. Based on the available information, the City has identified Building Backups (as defined by the Consent Decree) for 2015 and 2016 and has included that information in the 2016 Annual Report. This information does not include the volume, duration, or specific cause of the Building Backups. The City plans to modify its work order system to facilitate more comprehensive reporting on Building Backups in the future.

If you have any questions or need additional information regarding these issues, please do not hesitate to contact me.

Sincerely,



Joseph D. Jaco, P.E.
Director of Engineering