



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
OFFICE OF CRIMINAL ENFORCEMENT, FORENSICS AND TRAINING
NATIONAL ENFORCEMENT INVESTIGATIONS CENTER
P.O. BOX 25227, DENVER FEDERAL CENTER
DENVER, COLORADO 80225

FACSIMILE and HAND DELIVERED

April 12, 2005

Gary Fujita, Deputy Director
City of Detroit Water and Sewerage Department
General Administration
735 Randolph
Detroit, Michigan 48226

Re: Notification and Document Review Request Pursuant to Clean Water Act Compliance
Inspection, City of Detroit, Michigan

Dear Mr. Fujita:

The U.S. Environmental Protection Agency (EPA) National Enforcement Investigations Center (NEIC) will conduct a Clean Water Act compliance inspection of the City of Detroit's combined sewer system beginning on April 26, 2005. Representatives from EPA Region 5 and the Michigan Department of Environmental Quality may also participate in this inspection. The inspection and this document review request are authorized pursuant to EPA regulations and Federal environmental statutes, including but not limited to:

- Section 308(a) of the Clean Water Act, 33 U.S.C. § 1318(a),

The purpose of the inspection is to determine compliance with applicable environmental statutes, regulations, rules, decrees, approvals and permits. A list of records and documents requested by our EPA inspectors to be available for review is attached. We believe that many of these records are, or should be, readily available at your facility.

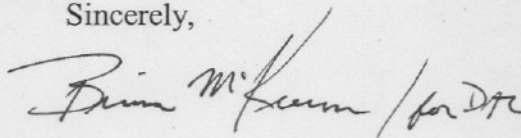
You may, if you desire, assert a confidentiality claim covering part of or all of the information requested, pursuant to 40 C.F.R. § 2.203(b), by attaching to such information, at the time it is submitted, a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as "trade secret" or "proprietary" or "company confidential". Information covered by such a claim will be disclosed by EPA only to the extent, and only by means of the procedures set forth in the regulations at 40 C.F.R. Part 2 Subpart B. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. In any event, you should read the above cited regulations carefully before asserting a business

confidentiality claim, since certain categories of information are not properly the subject of such a claim.

If you have questions about this inspection, please contact Daren Vanlerberghe, Project Leader from EPA-NEIC at (303) 462-9261.

We thank you in advance for your cooperation.

Sincerely,

A handwritten signature in cursive script, appearing to read "Diana M. Love / for DTL".

Diana A. Love, Esq.
Director, NEIC

Attachment

cc: Thomas Bramscher, EPA Region 5
Allan Batka, EPA Region 5

CITY OF DETROIT, MICHIGAN NEIC RECORDS/DOCUMENTS REQUEST

GENERAL PROCEDURE

During the Clean Water Act compliance inspection at the City of Detroit, EPA inspectors will be reviewing records kept for your facilities. In order to expedite this portion of the inspection, EPA is providing you advanced notification of the records that will likely be reviewed on-site. For most documents, EPA will review the records on-site and request copies, as needed. In certain cases, document copies will be requested for later review at EPA.

In preparation for the clean water act compliance inspection, EPA has broken up this record and document request into two parts. The first part consists of documents that EPA would like available and copies prepared (as noted) on April 26, 2005. The second part consists of specific documents that will probably be requested by EPA inspectors. Other documents may also be requested that are not listed. During the inspection, EPA will work with City of Detroit representatives to develop a schedule to review these documents.

PART 1 - Please have these documents and copies (as noted) available on April 26, 2005

1. Overview of combined sewer system, including all interceptors, pump/lift stations, CSO diversion/control structures, listing of all combined sewer overflow (CSO) outfalls and CSO outfall capacities (sewer size), associated CSO outfall receiving streams, and CSO outfall latitude/longitude information (7 copies).
2. Map(s) of combined sewer system showing location of all CSO outfalls, receiving waters, drainage areas, CSO diversion/control structures, interceptors, trunk sewers, catch basins, and pump/lift stations (3 copies).
3. Organization chart for the City of Detroit Water and Sewerage Department (4 copies).

PART 2- Documents likely to be requested by NEIC inspectors (Schedule to be determined)

1. Most current full Collection System and CSO Treatment Facilities Operational Plan, as referenced in NPDES Permit MI0022802, Part I, Section A.13.f.
2. Most current Wastewater Treatment Plant Wet Weather Operational Plan, as referenced in NPDES Permit MI0022802, Part I, Section A.8.

3. Operation and maintenance procedure(s) for the combined sewer system and CSO outfalls, including street cleaning, catch basin cleaning, sewer line cleaning and repair, pump station maintenance, and maintenance of CSO diversion/control structures.
4. Procedure(s) for inspecting the combined sewer system, including regulator and diversion structure inspections, CSO outfall inspections, pump/lift station inspections, sewer line inspections, and tide gate inspections.
5. Procedure(s) for maximizing use of the collection system for storage.
6. Documentation of actions taken to maximize use of the collection system for storage.
7. Documentation of any pretreatment program activities, including those specifically conducted to address CSO impacts.
8. Listing of significant industrial users and associated impacts on CSOs.
9. Current sewer use ordinance(s).
10. Documentation of actions taken to maximize flow to publicly owned treatment works (POTWs) for treatment, including any estimate of expected decrease in frequency and magnitude of CSOs.
11. Documentation of actions taken to eliminate dry weather overflows (DWOs).
12. Procedure(s) for identifying and reporting DWOs to permitting authorities.
13. Documentation of procedure(s) and/or controls in place for addressing solids and floatable materials in CSOs.
14. Documentation of pollution prevention programs to reduce contaminants in CSOs.
15. Documentation of procedure(s) and/or programs to provide public notification of CSOs, including public educational materials, signs marking location of CSO outfalls, logs of CSO discharges and associated public notification.
16. Written notifications of CSO discharges for the last year as referenced in NPDES Permit MI0022802, Part I, Section A.13.b.
17. Summary of existing water quality data for receiving waters impacted by CSOs.
18. Summary of receiving water impacts directly related to CSOs (e.g. fish kills, shoreline wash-up of floatables, hazards to small boat navigation).

19. Documentation of the effectiveness of the implementation of CSO control measures (e.g. reduction of floatables, fish kill incidents).
20. Discharge Monitoring Reports (DMRs) for monitoring points 101A, 102A, 103A, and 104A from January 1, 2004 to the present, as referenced in NPDES Permit MI0022802, Part I, Section A.6.
21. DMRs for monitoring points 105A, 106A, 107A from January 1, 2004 to the present, as referenced in NPDES Permit MI0022802, Part I, Section A.7.