

April 25, 2011

Ms. Amy L. Dragovich, P.E.  
Manager, Northern Municipal Unit, Permit Section  
Illinois Environmental Protection Agency  
1021 N. Grand Avenue East  
Springfield, IL 62702

RE: Request to revise CSO LTCP Implementation Schedule by Addendum No. 1

Dear Ms. Dragovich:

This will confirm and summarize the telephone conference held between the City of Aurora, IEPA, and our consultants, Strand Associates, Inc. on April 5, 2011 in which the city requested consideration to slightly amend the priority listing of projects to be implemented as a consequence of our CSO LTCP. Individuals on the call were:

**IEPA**

Roger Calloway  
Bruce Yurdin  
Al Keller  
Amy Dragovich

**City of Aurora**

Kenneth Schroth  
Eric Schoeny

**Strand Associates**

Scott Stearns  
Barton Jones

The essence of the conversation revolved around our desire to re-order the priorities of the CSO LTCP implementation schedule. We do not wish to alter the overall time...20 years as proposed in the LTCP the city submitted to IEPA in March 2010. In consultation with our consultant we have come to the conclusion that a slight modification to the identified CSO abatement projects would reduce uncertainty in the future sizing of the most expensive components of the Plan; namely, the CSO 001 storage/treatment facility and the CSO 004 pump station with additional associated storage at the CSO 001 site.

We hereby propose to accelerate sewer separation and the use of green infrastructure from the end of the implementing period to begin as soon as we receive approval from IEPA of our LTCP and to be completed by the year 2022. We cannot identify specific sewer separation projects at this time, but do have a plan to spend approximately \$39,420,000 on separation by 2022. We need flexibility to set priorities on specific separation projects based upon, but not limited to:

- Basement backups
- CSO discharge frequency/duration
- Street flooding, and
- Urban infill/redevelopment economic development opportunities

We also propose to simultaneously accelerate the use of green infrastructure to reduce the volume of stormwater entering our combined sewer system and to enhance water quality in receiving streams. We intend to integrate green infrastructure into sewer separation efforts and as stand alone projects. The city has identified 34 sites for green infrastructure projects based upon known geologic characteristics. All of these sites have been submitted to IEPA for possible funding through the IGIG program. Additionally, we will continue to explore where other sites might be used to support our green initiative. We have planned to spend approximately \$3,534,000 on green by the 2022 milestone now being proposed to complete partial sewer separation.

We propose to design and construct the CSO 001 wet weather storage/treatment facility beginning in 2022 with an anticipated completion date of 2026. We further propose to design and construct the CSO 004 pump station and additional wet weather storage facility located at the CSO 001 site beginning in 2022 with a completion date of 2030. This will complete our LTCP implementation as initially proposed in the 2010 LTCP submittal.

By accelerating the sewer separation and green infrastructure projects, we expect to greatly reduce the volume of stormwater that must be ultimately stored/treated to meet the presumptive approach as articulated in our LTCP. We also propose to use flow monitoring results to more precisely size the storage/treatment facilities in order to ground-truth the expected volume reduction associated with separation and green infrastructure. We expect to conduct extensive flow monitoring in the 2020-2022 time frame to facilitate design of the CSO 001/CSO 004 solutions that would begin in 2022. If we were to proceed with the design of those facilities as initially proposed in the 2010 LTCP, the designs would have to be predicated upon the hydraulic model results. It is our opinion that moving the design of these facilities until after the results of sewer separation and the use of green infrastructure on volume reduction is known will provide a better, more cost effective design.

Appended to this letter is a REVISED LTCP IMPLEMENTATION SCHEDULE which should be used to replace Table 8.05-1 in the March 2010 LTCP submittal. We have added details to identify annual spending to this schedule as requested in your email of April 11, 2011. Should you have any questions please contact me.

Sincerely,

L. Eric Schoeny, P.E., CFM  
Drainage and Underground Coordinator  
City of Aurora

CC: Bruce Yurdin, IEPA  
Jay Patel, IEPA  
Ken Schroth, P.E., CFM City of Aurora  
Bart Jones, P.E., Strand Associates  
Scott Stearns, P.E. Strand Associates

City of Aurora, Illinois  
 Combined sewer Overflow Long Term Control Plan--Addendum 1  
 Revised Implementation Schedule to Replace Table 8.05-1  
 18-Apr-11

<b>GROUP 1 EARLY ACTION PROJECTS</b>			
Year(s)	Project Description	Remarks	Project Capital Cost
2011	Stormwater utility Enhancement	Provides a technically and legally defensible stormwater rate based upon impervious area methodology. Stormwater fees to partially pay for CSO Abatement	\$500,000
2011-2012	CSO 25 - G24 and G25	Controls CSO 25 discharge to Indian Creek to a 1 year storm recurrence interval	\$1,690,000
2011-2021	CSO Diversion Structure Modifications	Allows better metering of overflows and reduces river water intrusion into the sewer system and WWTP	\$5,000,000
2011-2021	Remote Metering and Telemetry	Allows early detection and remote monitoring of future overflows	\$1,000,000
2012-2014	Develop and Submit Use Attainability Analysis to IEPA	Required to seek revision to water quality standards for wet weather impacts	\$200,000
2014-2016	Property Acquisition for CSO Storage/Treatment Facility	Self Explanatory	\$500,000
<b>Sub-total Group 1 Early Actions Items</b>			<b>\$8,890,000</b>
<b>GROUP 2 PROJECTS</b>			
2012-2022	Sewer Separation	Partial sewer system separation which will be prioritized based upon basement backups; CSO discharges; street flooding and urban infill/redevelopment economic development opportunities. Due to these priorities, flexibility in implementing separation projects must be maintained	\$39,420,000
2012-2022	Green Infrastructure	Green infrastructure will be implemented in conjunction with sewer separation; therefore flexibility in scheduling must be maintained. Aurora has preliminarily identified 34 sites for GI based upon known geological characteristics. These sites have been submitted to IEPA for possible funding through the IGIG Program.	\$3,534,000
<b>Sub-total Group 2 Projects</b>			<b>\$42,954,000</b>
<b>GROUP 3 PROJECTS</b>			
2022-2025	CSO 001 Storage Facility:		
		Special Waste Removal	\$1,389,000
		Gravity Sewer G01	\$270,000
		Diversion Structure	\$350,000
		Screening for CSO 001 Basin Flows	\$10,910,000
		Storage---It is expected that sewer separation and GI will greatly reduce the volume of stormwater entering the combined sewer system. Postponing this group of projects will allow for ground-truthing of the 2010 hydraulic model predictions utilizing 2018-2020 flow monitoring data.	\$12,250,000
		Transfer Pump Station	\$4,650,000
		Outfall gravity sewer	\$3,554,000
2024-2026	CSO 001 Treatment Facility	Sizing of treatment units will also be based upon 2018-2020 flow monitoring data.	\$8,120,000
<b>Sub-total Group 3 Projects</b>			<b>\$41,493,000</b>
<b>GROUP 4 PROJECTS</b>			
2025-2028	CSO 004 Pump Station/Force Main:		
		Property Acquisition	\$25,000
		Wet Weather Pump Station P5004. Sizing to be based upon new flow monitoring data obtained in 2023-2025 to take advantage of sewer separation and GI.	\$8,980,000
		Force Main P04,P03,P07, P02. Sizing to be based upon 2023-2025 flow monitoring data.	\$5,735,000
2028-2030	Additional Storage at CSO 001 Facility	To accommodate flows from CSO 004 Basin	\$12,250,000
<b>Sub-total Group 4 Projects</b>			<b>\$26,990,000</b>
<b>TOTAL CSO IMPLEMENTATION COSTS</b>			<b>\$120,327,000</b>