



**Metropolitan
St. Louis Sewer
District**

2350 Market Street
St. Louis, MO 63103-2555
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April 22, 2008

William Spratlin, Director Water, Wetlands & Pesticides
US Environmental Protection Agency
Region VII
901 North 5th Street
Kansas City, KS 66101

RE: Proposal for Revision of Unilateral Administrative Sign Order for Inspection of Signs

Dear Mr. Spratlin:

As I discussed previously with you, this past year the U.S. EPA issued an Amended Unilateral Administrative Order ("Order") requiring MSD to, among other non-regulatory-based requirements, install warning signs adjacent to the District's sanitary sewer constructed overflows and downstream for 2 miles and in other areas. The Order required the installation of over 1,500 individual signs in the MSD service area. Signs were placed in areas where MSD had authority or was granted authority by the landowner, as stated in MSD's letter of May 23, 2007. Another provision of the Order requires that MSD visually check each sign on a monthly basis to assure that they remain posted.

While MSD continues to remove constructed SSO's and the related signs pursuant to our CIRP program, the sign inspection requirement represents over 17,000 sign inspections annually. Over 17,000 sign inspections annually is very labor-intensive for a public agency. The inspections have revealed the need to reinstall a minimal number of signs, and that number is declining. The number of sign replacements has been as follows:

| | |
|-----------------|----------------------|
| August, 2007 | 24 signs reinstalled |
| September, 2007 | 17 signs reinstalled |
| October, 2007 | 3 signs reinstalled |
| November, 2007 | 6 signs reinstalled |
| December, 2007 | 8 signs reinstalled |
| January, 2008 | 7 signs reinstalled |
| February, 2008 | 15 signs reinstalled |
| March, 2008 | 7 signs reinstalled |

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Nothing in MSD's experience regarding the number of signs removed or damaged warrants the major dollar expenditure of labor by District staff. The man hours spent on sign inspection/reinstallation could be used more effectively for the operation and maintenance programs in the collection system and the other work of the District. For example, the District will devote over 3,200 man hours to sign inspections for one year. This labor could be used to clean over 80 miles of the sewer systems on an annual basis.

Initially, MSD met with EPA and requested that the Order be revised as to the number of signs, reports and inspections being required. Minimal revisions were accepted. However, now that eight months of data is available to illustrate the minimal number of signs needing to be reinstalled, MSD is requesting that EPA revise the provision of the Order requiring monthly inspections.

The District would like to propose a revised schedule for inspecting signs. We suggest that all signs be inspected during the months of March, June and September. This assures that signs are checked in warm weather recreational months when the public is more likely to enter stream beds which may be impacted by the wet weather overflows through the constructed pipes.

The labor saved can then be focused on collection system maintenance activities such as system cleaning, CCTV inspection, customer response, and situations such as the recent major flooding. These areas yield greater environmental benefits than inspecting signs at the current frequency.

If you require more information, please do not hesitate to call. We will continue to follow the current requirements of the Order until we hear of a change in your position on this issue.

Sincerely,



Jeffrey Theerman, P.E.
Executive Director
Metropolitan St. Louis Sewer District

Cc: Martha Steincamp, U.S. EPA Region VII
Tony Petruska
Joseph Bindbeutel
Kathryn MacDonald
Kevin Mohammadi
Ed Galbraith
Rob Morrison
Kara Valentine

Bcc: Mr. Randy Hayman
Ms. Susan Myers
Ms. Terry J. Satterlee