



## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII  
901 N. 5TH STREET  
KANSAS CITY, KANSAS 66101

**MAY 13 2008**

**VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED**

Jeffrey Theerman  
Metropolitan St. Louis Sewer District  
2350 Market Street  
St. Louis, Missouri 63103-2555

Re: Response to Proposed Revision of Unilateral Administrative Sign Order

Dear Mr. Theerman:

On May 22, 2007, the Environmental Protection Agency issued an Amended Findings of Violation and Order for Compliance instructing MSD to install warning signs at every SSO point and periodically downstream of said discharge point for two miles. The signs were to be posted along all streams, creeks, drainage ditches and swales that receive SSO discharges. To be in compliance with the requirements of the Order, the signs must be posted at all surface discharge points and downstream so the sign is visible to individuals approaching the waterbody from land and readable from **both** banks of the receiving waterbody. EPA has conducted several site visits to view the signs that MSD has installed, and has identified several where the sign was not visible to anyone approaching the waterbody because the sign was facing the stream and/or not readable from both banks. MSD must install signs that are visible to anyone approaching the waterbody and readable from both banks at the SSO discharge points by June 30, 2008. Areas of concern include but are not limited to Pardee Lane, Bopp Road, Viminal Court, Lemay Park, Trenton Avenue, and Wrenwood (near lake).

In accordance with the Sign Order, MSD was to inspect all sign locations at least monthly. Following your request dated April 22, 2008, EPA will amend the Sign Order to require inspections of all **downstream** sign locations during the recreation season. These downstream signs shall be inspected at least during the months of March, June and September. However, given that it is MSD's stated practice to inspect the SSO points at least monthly (as discussed in the February 2006 meeting with MSD and EPA), MSD shall continue its monthly inspections of the signs located at the SSO discharge points, as this should not impose an additional burden on MSD resources. Please submit a copy of

the mailer sent annually to MSD's customers as required by Paragraph 23 of the Sign Order.

If you have any questions please contact Ms. Jodi Bruno of my staff at (913) 551-7810 or [bruno.jodi@epa.gov](mailto:bruno.jodi@epa.gov).

Sincerely,



William A. Spratlin  
Director  
Water, Wetlands and Pesticide Division

cc: Terry Satterlee, MSD  
Randy E. Hayman, MSD  
Kathryn C. Macdonald, DOJ  
Martha R. Steincamp, EPA  
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