

Public Questions/Comments and MWRD Responses to the  
 April 14, 2014 Draft Article 8: Infiltration and Inflow Control Program

| Public Question/Comment  | MWRD Response   |
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| <p>The USEPA indicated that the initially proposed Program previously included the following: condition assessment of 50% of the system, rehabilitation of high priority defects/deficiencies within 3 years of identification, and disconnection of downspouts within 6 months of identification. They have expressed their concern that the aforementioned requirements are not part of the program.</p> | <p>The Program will require the community to prioritize its condition assessment based on the areas that contribute the most I/I. A local Capital Improvement Program will be developed prioritizing rehabilitation needs of the system, which must begin addressing those needs within 3 years. A downspout connected to the sanitary sewer is considered a cross connection. The Program requires all cross connections to be disconnected within one year of identification.</p> |
| <p>The USEPA indicated that under the Program, communities have 5 years to develop their Private Sector Program. USEPA has expressed concern that there is no requirement to perform work to reduce private I/I sources within those 5 years.</p>  | <p>Many communities currently have a program that continually addresses private I/I sources. For those communities that do not have a private program, the MWRD believes 5 years is a reasonable timeframe for them to make the difficult political and economic decisions to advance, develop, and implement their Private Sector Program.</p>   |
| <p>An engineering firm suggested adding the requirement to repair uncovered or broken service lateral cleanout caps and disconnect downspouts within one year of identification.</p>   | <p>The repair of service lateral cleanouts within one year of identification has been added to the Program. Downspout disconnection is addressed in the Program.</p>  |
| <p>An engineering firm asked if the MWRD will develop updated transport and treatment costs for cost-effective I/I source removal.</p>   | <p>ICAP allowed communities to rehabilitate cost-effective I/I sources. The requirement of the new Program is to perform on-going inspections and conduct continuous maintenance and rehabilitation work on the entire system to ensure that its design capacity is provided.</p>   |
| <p>An engineering firm asked if the MWRD will develop a standard design storm and metrics to evaluate system performance.</p>  | <p>The MWRD is interested in the amount of completed maintenance and rehabilitation work and the number of SSOs and BBs. System performance can be evaluated by the reduction of SSOs and BBs due to I/I reduction work performed on the system.</p>  |
| <p>An engineering firm asked if the MWRD will develop local storage standards and requirements for projects that pursue storage as an option for I/I control.</p>  | <p>The MWRD will develop a set of standards and requirements for local storage requirements.</p>  |

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| <p>An engineering firm expressed its concern with the MWRD interceptor flow allocation being limited to built capacity versus modeled capacity during wet weather and how flow allocation will be set.</p> | <p>The interceptor capacity analysis is still on-going. The MWRD must analyze the results prior to allocating flows to the communities.</p>  |
| <p>Does the MWRD have a funding source that communities can utilize to implement this program?</p>   | <p>MWRD has the legislative authority to implement a low-interest loan program for public sector work. The MWRD does not have authority to provide loans for private sector work or authority to provide grants. Other funding sources include IEPA's SRF loans and local sewer service fees.</p>                              |
| <p>Can the MWRD administer the IEPA's SRF Loans?</p>   | <p>The MWRD and IEPA would need to work together and revise their internal policies and enabling legislations.</p>   |
| <p>Why are the Combined Sewer Area and the City of Chicago exempted from the Program?</p>  | <p>Excess flows within the combined sewer area are captured and treated by TARP, providing flood control, pollution prevention and CSO prevention. The City of Chicago is undergoing 900 miles of sewer rehabilitation work and has \$50 million for GI projects, which will reduce the amount of I/I entering its system.</p> |
| <p>Will home inspections be required as part of this Program?</p>  | <p>Home inspections will not be a requirement of the Program. However, communities may require home inspections as part of their Private Sector Program.</p>   |
| <p>Will the MWRD have guidance documents, templates and other resources available for communities to utilize?</p>  | <p>The MWRD is developing a Technical Guidance Manual, which will have template documents, technical resources and other documents intended to assist communities with Program implementation and compliance.</p>  |