

OHIO ENVIRONMENTAL PROTECTION AGENCY

ENTERED DIRECTOR'S JOURNAL

In the Matter of:

City of Cuyahoga Falls
2310 Second Street
Cuyahoga Falls, Ohio 44211

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Director's Final Findings
and Orders

Respondent

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders ("Orders") are issued to the City of Cuyahoga Falls ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code (ORC) §§ 6111.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6111. and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA ("Director") has determined the following findings:

1. On January 30, 2003, Ohio EPA received a Verified Complaint (VC), No. VC0302W01, from Steven DeBord of the Lock 11 environmental organization (Complainant), alleging that the Respondent is discharging sewage into an unnamed tributary to the Cuyahoga River via several overflow pipes.
2. On June 30, 1994, Respondent was issued a community discharge permit by the City of Akron with identified permit overflows.

I certify this to be a true and accurate copy of the official document as filed in the records of the Ohio Environmental Protection Agency.

By Michael A. Shapiro Date 6/22/04

3. Ohio EPA, Northeast District Office (NEDO), Division of Surface Water (DSW), met with the Respondent on March 21, 2003 to discuss the VC and the investigation process.
4. NEDO, DSW reviewed Respondent's utility maps on March 31, 2003, and identified ten (10) sanitary sewer overflows (SSOs) within Respondent's sewer system.
5. On April 29, 2003, NEDO, DSW conducted a field verification of the SSOs specifically listed in the VC; this investigation confirmed the existence of the SSOs within Respondent's sewer system which discharge untreated sanitary sewage to the Cuyahoga River and/ or an unnamed tributary thereto.
6. The Cuyahoga River and the unnamed tributary thereto are defined as a "waters of the state" pursuant to ORC § 6111.01.
7. The discharge of sanitary sewage to "waters of the state" without a valid National Pollutant Discharge Elimination System (NPDES) permit is a violation of ORC § 6111.04.
8. It is anticipated that Respondent will continue to discharge from the SSOs present in its sewer system. Therefore, these Orders are necessary to bring Respondent into compliance with Ohio's water pollution control laws in accordance with the schedule contained herein.
9. It is necessary for the public health and welfare that Respondent eliminate the SSOs which are discharging untreated sanitary sewage to the Cuyahoga River and/ or an unnamed tributary thereto.
10. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the permit to install (PTI) requirement of ORC §§ 6111.44 and 6111.45 and OAC Chapter 3745-42.
11. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the state to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

V. ORDERS

1. Upon the effective date of these Orders, Respondent shall commence a monitoring program as outlined below for all of the SSOs identified in Attachment 1, which is attached to these Orders and incorporated by reference as if fully rewritten within.

- a. A monthly report shall be submitted to Ohio EPA by the 15th of the month following the effective date of these Orders, and on the 15th of each month thereafter.
 - b. The monthly report shall detail all SSO occurrences during the month. The SSO occurrences shall be identified by the outfall numbers as listed in Attachment 1, and information regarding the time of overflow, duration of overflow, approximate volume of overflow, reason for overflow, and methods taken to correct the overflow shall be included in the monthly report.
2. Respondent shall develop and implement a Capacity, Management, Operation, and Maintenance (CMOM) Program for all parts of the sewer system that Respondent owns or over which Respondent has operational control. Respondent's CMOM Program shall meet the following criteria:
- a. General Standards - Respondent's CMOM Program shall be consistent with the following general standards:
 - i. Properly manage, operate and maintain its sewer system at all times;
 - ii. Take all feasible steps to stop, and mitigate the impact of, SSOs as soon as possible; and
 - iii. Provide notification that will be available to parties with a reasonable potential for exposure to pollutants associated with the SSO event.
 - b. Management Program - as part of its CMOM Program, Respondent shall develop a management program to implement activities for its CMOM program to comply with paragraph 2.a. The management program may incorporate other documents by reference and will include, at a minimum, the following:
 - i. Program Goals - major goals of Respondent's CMOM program, consistent with the general standards identified in paragraph 2.a. above;
 - ii. Organization Description
 - (1) Administrative and maintenance positions responsible for implementing measures in Respondent's CMOM program, including lines of authority by an organization chart or similar document; and
 - (2) The chain of communication for reporting overflows, from the receipt of a complaint or other information to the person responsible for reporting to appropriate State and/or local health agencies.

- iii. Legal Authorities - Respondent's CMOM Program shall include the implementation and enforcement of sewer use ordinances, service agreements or other legally binding documents that:
 - (1) Control infiltration and connections from inflow sources;
 - (2) Require that all sewers and connections be properly designed and constructed;
 - (3) Ensure proper installation, testing, and inspection of new and rehabilitated sewers (such as new or rehabilitated collector sewers and new or rehabilitated service laterals); and
 - (4) Address flows from satellite municipal collection systems.
- iv. Implementation Measures and Activities - Respondent shall identify its activities and measures to implement its CMOM program for its sewer system. Respondent shall address the elements listed in Orders 2.b.iv.(1) through 2.b.iv.(5), below, and identify the person or position in Respondent's organization responsible for each element. Respondent shall include a description of how Respondent will monitor implementation of each applicable element and, where possible, measure performance.
 - (1) Maintenance Facilities, Equipment, and Replacement Parts:
 - (a) Providing adequate maintenance facilities and equipment;
 - (b) Identification of critical parts needed for system operation and maintenance; and
 - (c) Maintaining an adequate inventory of replacement parts.
 - (2) Routine Preventive Maintenance
 - (a) Providing adequate preventive and routine maintenance using predictive approach; and
 - (b) Continually reviewing and updating maintenance procedures using information management systems that use predictive processes.
 - (3) Information Management
 - (a) Development and maintenance of an accurate and up-to-date map of the collection system;

- (b) Managing information and using timely, relevant information for establishing and prioritizing appropriate CMOM activities, and identifying and illustrating trends in overflow occurrences;
 - (c) Responding to overflows, providing emergency operations, and preventive operations;
 - (d) Tracking collection system problems, failures and/or violations, including customer complaints; and
 - (e) Maintaining records for work orders associated with investigations, inspections, new installations, preventive and routine maintenance, and corrective actions.
- (4) Operations and Capacity Management
- (a) Ensuring proper installation, testing and inspection of new sewers and new connections (including new service laterals) to Respondent's collection system;
 - (b) Continually assessing the current structural integrity and capacity of the sewer system which Respondent owns or over which Respondent has operational control;
 - (c) Assessing, evaluating, and addressing as appropriate, the impact of industrial discharges to the collection system tributary to the overflow or bypass;
 - (d) Providing ongoing identification and prioritization of structural and hydraulic deficiencies and rehabilitation actions to address each deficiency.
- (5) Training and Review
- (a) Providing appropriate training on a regular basis, including refresher training, on safe procedures for implementation of the provisions of the CMOM program for employees and other appropriate parties; and
 - (b) Providing annual reviews by representatives of all levels of management and staff to assess the overall effectiveness of Respondent's CMOM program and make recommendations for adjustments.

- v. Design and Performance Provisions - Respondent shall identify:
 - (1) Requirements and/or standards that Respondent imposes for the installation of new sewers, pumps and other appurtenances and rehabilitation and repair projects; and
 - (2) Procedures and specifications for inspecting and/or testing the installation of new sewers, pumps and other appurtenances and for rehabilitation and repair projects.
- vi. Modifications - The measures and activities taken to implement Respondent's CMOM program should be monitored on an ongoing basis and updated as appropriate. Respondent shall modify its management programs as appropriate to keep them updated and accurate.
- c. Overflow Response Plans
 - i. Respondent shall develop and implement an overflow response plan that identifies measures to protect public health and the environment by ensuring that: every report of an overflow event is immediately dispatched to the appropriate personnel for investigation and appropriate response; response activities are coordinated with the appropriate State and/or local health agencies; and appropriate notification and reporting are made.
 - ii. Respondent's overflow response plan shall address the following elements:
 - (1) Overflow response procedure - an overflow response procedure that describes steps to be taken to address any potential system failures. The procedure must address receiving and dispatching information during investigation and response; mobilizing labor and equipment to investigate reported incidents and take appropriate responses; and documenting the findings and response.
 - (2) Public Notification - The overflow response plan must describe actions that will be taken, in cooperation with State and/or local health agencies and clarify the entity responsible for each of the following actions:
 - (a) Limiting public access to areas potentially impacted by an overflow;
 - (b) Posting warning signs at emergency overflow outfall locations where affected water bodies are accessible to the public; and

- (c) Provide public notification to radio, television, Internet and newspaper as appropriate.
 - (3) Immediate Notification of Health Officials and State authorities - The plan will provide criteria for evaluating specific overflow events in order to identify if immediate notification of Ohio EPA, the local health department, or other impacted entity (e.g., water supplier) is required, and a description of the procedures for such notification. The criteria will include or consider uses of the impacted water as well as other relevant factors.
 - (4) Reporting all relevant information regarding all overflow/bypass events that were caused in whole or in part by high volume flows to Ohio EPA including:
 - (a) The location of the overflow and the receiving water;
 - (b) An estimate of the volume of the overflow;
 - (c) A description of the sewer system component from which the release occurred (e.g. manhole, constructed overflow pipe, crack in pipe);
 - (d) The estimated date and time when the overflow began and when it stopped;
 - (e) The cause or suspected cause of the overflow; and
 - (f) Steps that have been and will be taken to prevent the overflow from recurring and a schedule for those steps and a mechanism to identify and illustrate trends in overflow occurrences.
 - (5) Distribution and Maintenance - The overflow response plan will describe: how the plan will be made available to personnel responsible for implementing the plan, as well as other interested parties; training procedures for appropriate personnel, including the frequency of the training activities; and the process for reviewing and updating the plan.
- d. System Evaluation and Capacity Assurance Plan - Respondent must prepare and implement a plan for system evaluation and capacity assurance (SECAP); the plan must include a description of:
 - i. Evaluation - Steps to evaluate the sewer system. The evaluation must provide estimates of peak flows (including flows from SSOs that escape

from the system) associated with conditions similar to those causing overflow events, provide estimates of the capacity of key system components, identify hydraulic deficiencies, including components of the system with limiting capacity and identify the major sources that contribute to the peak flows associated with the overflow events;

- ii. Capacity Enhancement Measures - Short term and long term actions to address each hydraulic deficiency, including:
 - (1) The process used for prioritizing deficiencies and actions taken to address deficiencies;
 - (2) A systematic evaluation of a comprehensive set of feasible alternatives for addressing each deficiency, including estimated costs and performances of various alternatives;
 - (3) A demonstration that selected alternatives are implementable from legal, institutional, financial and management standpoints; and
 - (4) A schedule of key milestones, including proposed start and completion dates, for specific recommended measures.
 - iii. Municipal Satellite Collection Systems - For any municipal satellite collection system that is a significant contributor to peak flow conditions that contribute to a SSO discharge caused by a hydraulic deficiency, a description of peak flow allocations, and measures and/or standards imposed through service agreements or other means to ensure that peak flow allocations are not exceeded.
 - iv. Plan Updates - The plan must be updated to describe any significant change in proposed actions and/or the implementation schedule. The plan must also be updated to reflect available information on the performance of measures that have been implemented.
- e. CMOM Program Audits
- i. From the effective date of these Orders, Respondent shall certify at least once every two years that Respondent has conducted an audit to evaluate implementation of the CMOM program to comply with paragraph 2.a. and summarized under paragraph 2.b, including the overflow response plans required under paragraph 2.c., and the system evaluation and capacity assurance plan under paragraph 2.d.
 - ii. Respondent shall develop an audit report, based on an evaluation of interviews with facility managers, field inspection of equipment and other resources, interviews with field personnel and first level supervisors,

observation of field crews, and review of pertinent records and information management systems. At a minimum the audit report must address:

- (1) The findings of the audit, including deficiencies;
- (2) Documentation of steps taken to respond to each finding in the report, including steps taken to correct each deficiency; and
- (3) A schedule for additional steps to respond to findings of the report.

iii. Respondent shall retain the two most recent compliance audits.

f. Signature, Certifications and Availability

- i. The CMOM management program required under paragraph 2.b, overflow response plan required under paragraph 2.c., system evaluation and capacity assurance plan required under Order 2.d., and audit report required under paragraph 2.e. shall be signed when major modifications to the document are made in accordance with the signature and certification provisions of OAC Rule 3745-33-03(D)(4).
- ii. Respondent shall make all CMOM program documentation available to any interested parties unless such documents are prohibited from disclosure pursuant to applicable state or federal law.
- iii. Communications - Respondent shall establish a system for communicating on a regular basis with various interested parties on the implementation of its CMOM program. The communication system shall address the performance of elements of the CMOM program and allow interested parties to provide input to Respondent as the CMOM program is developed and implemented.

3. Within six (6) months of the effective date of these Orders, Respondent shall submit to Ohio EPA for approval an Overflow Response Plan as described in Order No. 2.c.
4. Within nine (9) months of the effective date of these Orders, Respondent shall have implemented its Overflow Response Plan as approved by Ohio EPA.
5. Within twelve (12) months of the effective date of these Orders, Respondent shall submit to Ohio EPA for approval a written summary of the program it has developed in accordance with Order No. 2. The summary shall address all of the elements set forth in Order No. 2 above. Respondent shall modify the summary as appropriate to keep it updated and accurate.

6. Within sixteen (16) months of the effective date of these Orders, Respondent shall submit for Ohio EPA approval its SECAP as described in Order No. 2.d including an implementation schedule, which upon approval shall be incorporated as if fully rewritten herein. The implementation schedule shall include dates for the submittal of approvable PTI, the start of construction for each project, and the end of construction for each project. The implementation schedule shall be written so that it provides for a consistent level of effort internally and through contractors for removing the SSOs.
7. Immediately upon approval by Ohio EPA, Respondent shall implement its SECAP as approved pursuant to Order No. 6.
8. Within thirty (30) days of receipt of any written comments from Ohio EPA regarding the submittals required under Order Nos. 1 through 6 above, Respondent shall make any requested changes or modifications and/or submit any additional requested information to Ohio EPA.
9. Respondent shall pay Ohio EPA the amount of \$50,000.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 6111. Respondent may satisfy this civil penalty requirement by:
 - a. Payment within thirty (30) days of the effective date of these Orders via official check made payable to "Treasurer, State of Ohio" for \$50,000.00 and submitted to Ohio EPA, Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049, together with a letter identifying the Respondent; **or**
 - b. Submission to Ohio EPA within thirty (30) days of the effective date of these Orders of a written commitment to pursue and fully complete one of the following supplemental environmental projects (SEP):
 - i. Riparian restoration at former Prospect Mold and Die site on the Cuyahoga River: This property has been purchased by Respondent as part of ongoing efforts to create a river corridor. This restoration shall include, at a minimum, removal of buildings and parking lots followed by restoration of vegetation, and is estimated to have a total project cost of \$200,000.00. This SEP shall be completed within eighteen (18) months of the effective date of these Orders.
 - ii. Dam removal study of two Cuyahoga River dams in Respondent's downtown area: This study shall look at, as a minimum, an informed and public decision making process, potential environmental, social, safety and economic impacts and long term monitoring of these impacts. Alternatives to complete removal should also be reviewed. This SEP is estimated to have a total project cost of \$50,000.00, and shall be completed within two (2) years of the effective date of these Orders.

- iii. A wetlands and/or environmental study of all riparian zones and property in the Mud Brook watershed not previously assessed in the Mud Brook Watershed Management Plan prepared by the Cities of Stow and Hudson: This study shall evaluate, as a minimum, existing conditions of the stream, impacts of urbanization, and potential remediation techniques, and has an estimated total project cost of \$350,000.00. This SEP shall be completed within eighteen (18) months of the effective date of these Orders.
 - iv. Riparian restoration at former Jim's Transmission site on the Cuyahoga River: This property has been purchased by the Respondent as part of ongoing efforts to create a river corridor. Restoration of the property shall include, at a minimum, removal of buildings and parking lots followed by restoration of vegetation, with an estimated total project cost of \$200,000.00. This SEP shall be completed within two (2) years of the effective date of these Orders.
10. Should Respondent chose to pursue the SEP option, within 30 days after completion of the SEP committed to as outlined in Order No. 9b, Respondent shall submit documentation confirming timely and full completion of the SEP to Ohio EPA, along with a certification of the actual costs of performing the SEP.
 11. Should Respondent chose to purse the SEP option and fail to complete the SEP committed to as outlined in Order No. 9b on or before the required timeframe, Respondent shall pay to Ohio EPA the \$50,000.00 civil penalty as stipulated in Order No. 9a within thirty (30) days of receipt of written notification from Ohio EPA.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and Chief of Ohio EPA's Division of Surface Water, acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

This certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(D)(4) for a municipal, state, or other public facility.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, the Respondent's SSOs.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to the Respondent.

IX. MODIFICATIONS

These Orders may be modified by the agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio EPA
Northeast District Office
Division of Surface Water
2110 East Aurora Road
Twinsburg, Ohio 44087
Attn: DSW Enforcement Unit Supervisor

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only those violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

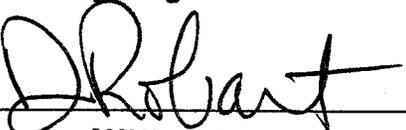
The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

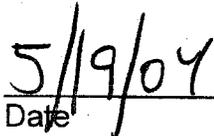
XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO AGREED:

City of Cuyahoga Falls

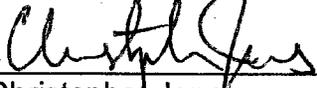
By 
MAYOR DON L. ROBART
2310 Second Street
Cuyahoga Falls, OH 44221

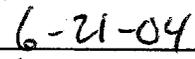

Date

Name & Title

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency


Christopher Jones
Director


Date

ATTACHMENT 1

Sanitary Sewer Outfalls Identified in the City of Akron Community Discharge Permit

Overflow Location	Permit Overflow Number	Site Description	Receiving Stream
Monroe and 7 th	CFMM-01-S	Pump Station	Cuyahoga River
Wilson and Pierce	CFMM-02-S	Pump Station	Cuyahoga River
Front and Hudson	CFMM-03-S		Cuyahoga River
Bailey Road bridge	CFMM-04-S		Cuyahoga River
Broad Blvd. @ SR 8	CFMM-05-S		Cuyahoga River
Gorge Diversion Vault	CFMM-06-S		Cuyahoga River
Phelps and 10 th	CFMM-07-S	Pump Station	Cuyahoga River
Falls and 19 th	CFMM-08-S	Pump Station	Cuyahoga River

ATTACHMENT 1

Sanitary Sewer Outfalls Identified in the City of Akron Community Discharge Permit

Overflow Location	Permit Overflow Number	Site Description	Receiving Stream
River Parkway	CFMM-09-S	Pump Station	Cuyahoga River
Rudolph	CFMM-10-S		Cuyahoga River
Sill and Main	CFMM-11-S		Cuyahoga River
6 th and Silver Lake	CFMM-12-S	Pump Station	Cuyahoga River
Gorge Park Manhole UU	CFMM-13-S		Cuyahoga River
Gorge Park Manhole QQ	CFMM-14-S		Cuyahoga River
Joan of Arc Circle	CFBR-01-S	Pump Station	Manan Lake
Valley Road (27 th and Harding)	CFBR-02-S		Trib. To Mud Brook

ATTACHMENT 1

Sanitary Sewer Outfalls Identified in the City of Akron Community Discharge Permit

Overflow Location	Permit Overflow Number	Site Description	Receiving Stream
Diversion Vault	CFBR-03-S		Cuyahoga River
Front and Vincent	CFMM-01-C		Little Cuyahoga River

ATTACHMENT 1

Sanitary Sewer Outfalls Identified by Ohio EPA during March 31, 2003 Utilities Map Review

Overflow Location	Cuyahoga Falls Index Number	Site Description
Babb Run	310	3 overflows : 15" VCP 10 3/4" blow off 6 5/8" blow off
Front Street and Harmon Court	216	Storm sewer, possible overflow
East side Cuyahoga River, Upstream of Prospect	517	15" sanitary
West Side Cuyahoga River, Upstream Broad and downstream broad	617	
West side Cuyahoga River, Riverfront Parkway and Oakwood Drive	817	15" VCP
Waterworks Park	923	8" overflow
Valley Road	1010	15" sanitary
Bailey Road Bridge, east side of Cuyahoga River, downstream bridge	1119	15" overflow
Waterworks Park	1122	6" sanitary sewer to river, 4" sanitary from settling tank at Waterworks
Oak Park Blvd. (Lots 13 & 14)	1221	21" VCP sanitary sewer
Front Street	1219	24" VCP combined sewer to river
Second and Vincent	1320	10" combined sewer, Cascade Rubber
Graham and Akron Cleveland	1412	Septic tank connected to 15" storm sewer (Archery range/ Helen Shaw)
West Graham, NW of Prange Drive	1413	8" sanitary sewer overflow to 72" storm sewer

ATTACHMENT 1

Sanitary Sewer Outfalls Identified by Ohio EPA during March 31, 2003 Utilities Map Review

Overflow Location	Cuyahoga Falls Index Number	Site Description
7 th Street, S of Monroe Pool drain, Lot 45	1415	Pump station, where does it discharge to?
Victor Avenue	1417	Force main overflow, where does it go?
Kilarney Ave. and Kathron	1417	8" overflow (continued on 1517)
Adams and Elmwood	1516	8" overflow
Elmwood and Van Buren	1616	12" overflow
Wilson and Moulton	1716	Overflow indicated in red ink on water dept. drawings)
High level bridge	212	14" steel pipe to Cuyahoga River, Sampled by Steve Tuckerman
MetroPark	213	24" to 27" overflow with head wall
MetroPark	214	12" and 10" line come into a 12" line, Steve Tuckerman believes this has an overflow.