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Water and Sewer
PO Box 330316 • 3071 SW 38 Avenue
Miami, Florida 33233-0316
T 305-665-7471

VIA ELECTRONIC CORRESPONDENCE

February 1, 2016

CCN: 60020
File No: 8.DC.20.19

Chief, Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
RE: DOJ No. 90-5-1-1-4022/1
Walter.Benjamin.Fisherow@usdoj.gov

Chief, Clean Water Enforcement Branch
Water Protection Division
Attn: Brad Ammons
U.S. Environmental Protection Agency, Region 4
61 Forsyth Street, S.W.
Atlanta, Georgia 30303
Ammons.Brad@epa.gov

Rachael Amy Kamons
Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611
Ben Franklin Station
Washington, D.C. 20044-7611
Rachael.Kamons@usdoj.gov

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Diane.Pupa@dep.state.fl.us

RE: Consent Decree (Case: No. 1:12-cv-24400-FAM)
Reference DOJ Case No. 90-5-1-1-4022/1
Section VI – Specific Capital Improvement Projects, Paragraph 19(i)
Section XX – Modification
Request for Non-Material Change – CD Project 5.2 – Upgrade of PS # 0691

Dear Sir/Madam:

Pursuant to our discussions during our December 4, 2015 teleconference, Miami-Dade County (County) respectfully requests to modify the scope of work for Appendix D-2, CIP 5.2 Upgrade of PS 0691. Attached for your review and approval is a technical memorandum outlining the requested non-material change to Project 5.2. This technical memorandum summarizes the presentation made by Water and Sewer Department (WASD) to the United States Environmental Protection Agency (EPA) and Florida Department of Environmental Protection (FDEP) at that meeting.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering such information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Should you have any questions regarding this matter, please call me at (786) 552-8120.

Sincerely,



Bertha Goldenberg, P.E., LEED® Green Associate
Assistant Director, Regulatory Compliance and Planning

Attachments: CD Project 5.2 Upgrade of PS 0691 Technical Memorandum, PS 0691 Current Schematic, PS 0691 Proposed Schematic

ec: Jonathan A. Glogau
Special Counsel
Chief, Complex Litigation
Office of the Attorney General
PL-01, The Capitol
Tallahassee, FL 32399-1050
850-414-3817
Jon.Glogau@myfloridalegal.com

Florida Department of Environmental Protection
Southeast District – West Palm Beach
3301 Gun Club Road, MSC 7210-1
West Palm Beach, FL 33406
Attn: Compliance/Enforcement Section
Jason.Andreotta@dep.state.fl.us
Lisa.M.Self@dep.state.fl.us
Sed.wastewater@dep.state.fl.us

Mayor Carlos A. Gimenez
Miami-Dade County
111 NW First Street 29th Floor
Miami, Florida 33128

Lester Sola, Director
Miami-Dade Water and Sewer Department
3071 SW 38th Avenue
Miami, Florida 33146

Jack Osterholt, Deputy Mayor/Director
Miami-Dade Regulatory and
Economic Resources
111 NW 1st Street. 29th Floor
Miami, FL 33128
Josterholt@miamidade.gov

Abigail Price-Williams
Miami-Dade County Attorney
111 NW First Street Suite 2810
Miami, Florida 33128

William Bush
Associate Regional Counsel
U.S. EPA, Region 4
61 Forsyth Street, SW
Atlanta, Georgia 30303
Bush.William@epa.gov

William A. Weinischke
Senior Trial Attorney
Environmental Enforcement Section
Environment and Natural Resources Division
U.S. Department of Justice
P.O. Box 7611
Washington, D.C. 20044
Bill.Weinischke@usdoj.gov

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Consent Decree PMCM Team
135 San Lorenzo | Suite 600
Coral Gables, FL 33146
(O) 305.444.4691 | (F) 305.447.3580

To	Daniel J. Edwards, PE
CC	Pete Hernandez, PE, Abby Diaz, Pedro Gonzalez
	CD PROJECT # 5.2, PCTS: 13316
Subject	Upgrade of Pump Station # 0691/ Replacement of pumping and electrical systems
From	Art Tillberg / Consent Decree PMCM Team
Date	November 24,2015
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Technical Memorandum

1. INTRODUCTION

In accordance with Appendix D of the United States Environmental Protection Agency (USEPA) Consent Decree (CD), Miami-Dade Water and Sewer Department (WASD), as part of Project 5.2, is required to **Upgrade PS 0691 – Replacement of pumping and electrical equipment. Existing equipment is beyond its useful life. Station capacity increase is required to handle increased Homestead flows.**

2. EXISTING CONDITIONS

Pump Station 0691 is located at 551 SE 8th Street, Homestead, Florida and is part of the South District Wastewater Treatment Plant (SDWWTP) Transmission System. The dry well/wet well is located on land owned by the City of Homestead and is under perpetual easement to Miami Dade County. Pump Station 0691 is not currently under moratorium and was included in the Consent Decree Program due to the advanced age of the mechanical and electrical operating equipment coupled with the critical role it currently plays in support of the Homestead Water and Sewer System. The pump station is fully operational and meeting current system demands.

3. PROPOSED LONG-TERM SOLUTION

Currently the City of Homestead is in the process of upgrading their Wastewater Treatment Plant head works and building a new Pump Station (PS 1) near the current location of PS 0691. Once completed, Homestead's PS 1 will discharge directly into a 42-inch force main within WASD's Wastewater Collection and Transmission System (WCTS). The City of Homestead's PS1 will perform the same hydraulic function as the existing PS 0691, hence completely eliminating the need of WASD's pump station.

Since the completion of City of Homestead's PS1 will render PS 0691 redundant and PS 0691 is nearing the end of its useful life, the proposed long term solution includes the decommissioning of PS 0691. The City of Homestead's PS1 is anticipated to be online by the end of December 2016, well in advance of the Consent Decree deadline for Project 5.2 (PS 0691). The resources being allocated to the current scope of work would be freed up to work on higher priority issues within the Consent Decree. Additionally, by revising the current contract between the City of Homestead and Miami Dade County, the current debt service fees imposed on the city of approximately \$208,520 per year for a 20 year period would be eliminated resulting in a \$3.1 million savings to Homestead.

Benefits of requested change, if approved

The City of Homestead's PS 1 will satisfy the needs of the Homestead system once it is placed into service. The decommission of PS 0691 would result in cost savings of \$4,613,000 in unnecessary upgrades, eliminate the need for ongoing maintenance and associated operating costs, and release the easement currently in place for the PS 0691 property which is located within the City of Homestead's Wastewater Treatment Plant to be available for more productive purposes.

Implications if requested change is rejected

If the proposed change is rejected, PS 0692 would be upgraded on schedule but would never be placed into service since the City of Homestead's PS1 will be online prior to scheduled completion. In addition, there will be long term diversion of Miami Dade Maintenance resources to service a pump station with no productive use.

4. CONCLUSIONS

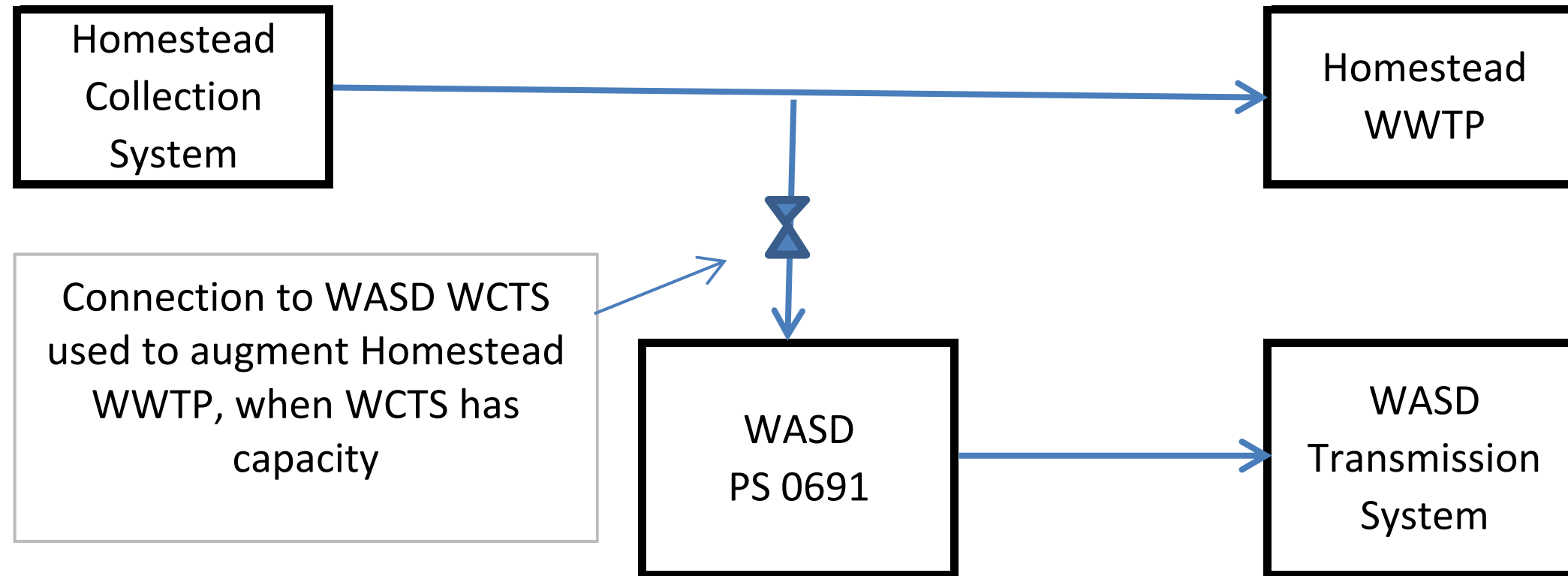
- Based on the City of Homestead's plans to build a new Pump Station (PS1) (currently in procurement) the need for PS 0691 is being eliminated.
- Rebuilding PS 0691 and not placing it into service would be to incur unnecessary costs in both material and maintenance manpower to ensure the equipment remains serviceable.
- The long-term benefits of decommissioning PS 0691 benefit both Miami Dade County and the City of Homestead.

5. RECOMMENDATION

The CD PMCM Team recommends redefining the scope of Consent Decree Project 5.2 to read, "Connect the City of Homestead's PS1, once completed, to the SDWWTP Transmission System and decommission PS 0691."

Pump Station PS0691

Present Situation



Pump Station PS0691

Proposed Condition

