

D Kelly O'Day

From: "D Kelly O'Day" <dkod@comcast.net>
Date: Wednesday, February 19, 2014 7:51 AM
To: "Shawn Garvin" <Garvin.Shawn@epa.gov>
Attach: PWD-NMC_6_History_summary.pdf
Subject: Re: PWD's CSO Nine Minimum Controls - NMC 6 Time Line (1995-2013)

Mr. Garvin

I am sorry that I accidentally left your name off my distribution list.

From: [D Kelly O'Day](#)

Sent: Tuesday, February 18, 2014 12:36 PM

To: [Laura Toran](#) ; [Robert Traver](#) ; [Bob Perciasepe](#) ; [Ramona Trovato](#) ; [Arthur McGarity](#) ; [Megan Heckert](#) ; [Jeffrey Featerhstone](#) ; [Thomas Ballestero](#) ; [Lynn Mandarano](#) ; [Garrett Clayton](#) ; [Sasha Eisenman](#) ; [Claire Welty](#) ; [Bridget Wadzuk](#) ; [Sen Siddhartha](#) ; [David Hsu](#) ; [John Landis](#) ; [Domenic Rocco](#) ; [Marc Cammarata](#) ; [Howard Neukrug](#) ; [Christine Knapp](#) ; [William Richardson](#) ; [Molly Pulket](#) ; [Joanne Dahme](#) ; [Angela Erat](#) ; [Garry Walters](#) ; [Jenifer E Fields](#) ; [David Burke](#) ; [Mark Waas](#) ; [Michelle Price-Fay](#) ; [Rick Howley](#) ; [Chris Crockett](#)

Subject: PWD's CSO Nine Minimum Controls - NMC 6 Time Line (1995-2013)



The Tookany â€ Tacony Creek has a serious floatables problem, some/ much of it

caused by PWD's MS4 and CSO outfall discharges. To understand PWD's solid and floatable materials program, I have reviewed the floatables related information in a number of EPA and PWD on-line documents.

This attached working paper traces PWD's documentation of their Nine Minimum Controls No. 6 (NMC 6) program from 1995 through 2013. Since PWD has created thousands of pages of watershed planning and CSO compliance documents, I have tried to consolidate key floatables monitoring / T-04 Pilot Netting actions/ statements into a single time-line that shows what PWD has reported on NMC 6 over this period.

Review of PWD's NMC 6 program time line raises a number of concerns about the conduct of PWD's floatables monitoring and quantification studies and the technical basis for PWD's Tookany - Tacony Creek floatables control program which I have itemized in the working paper.

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