

Water Quality Considerations for Lakefront and Shoreway Reconstruction

3/14/03
 2:00 PM to 3:30 PM
 NEORSD Administrative Offices
 3826 Euclid Ave

Purpose: Information gathering and sharing to develop a long term cooperative relationship to improve consider water quality and ecological aspects of lakefront planning/ reconstruction efforts

Anticipated Attendees

Craig Hebebrand -- ODOT	Erwin Odeal- NEORSD
Darnell Brown or Tom Marsalis -- Cleveland DWPC	Lester Stumpe - NEORSD
Debby Berry --- Lakefront Project	Frank Greenland - NEORSD
Linda Henrichsen - Cleveland - Planning Department	

Agenda

Meeting Agenda	Lester Stumpe	5
Outline of Issues and presentation of current information	Lester Stumpe	15
• Understanding the current sewer system		
• Understanding potential impacts from separate storm sewer areas		
General discussion Q/A regarding potential impacts	General discussion ---- All	10
What tools are available to assess the issues	Lester Stumpe	15
Discussion regarding tools and potential efforts	General discussion ---- All	15
Review/develop action agenda for future work	General discussion ---- All	15

Additional Information

Special notes:

D1

Mail From: "Craig Hebebrand" <Craig.Hebebrand@dot.state.oh.us>

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From: "Craig Hebebrand" <Craig.Hebebrand@dot.state.oh.us>
To: StumpeL, AdministrationPO, AdministrationDOM
CC: "Dave.Lastovka@dot.state.oh.us", GWIA, GWIADOM
Subject: Cleveland Innerbelt Study - Water Quality

Lester,

Please be advised that I have some concerns regarding your submission.

The objectives you listed appear to have more to do with revising the planning process, than with establishing goals and objectives that are specific to the Cleveland Innerbelt Study. Please be advised that the existing Goals and Objectives already identify the community's desire to "protect and enhance the natural environment." This would include the desire to "protect and enhance water quality" as well.

Please understand that the Ohio Department of Transportation continues to pursue the identification of "reasonable and responsible" actions to protect and improve water quality. I also believe that the District Office has clearly demonstrated ODOT's commitment to cooperate with the NEORSD, and other local government agencies, in resolving stormwater issues (Chevrolet Branch and Kerruish Park).

Rather than continue to debate the merits of your submission, I would respectfully request that we instead focus our joint attention on identifying specific water quality/water quantity issues directly related to the Innerbelt Freeway and attempt to work together to identify effective, efficient and practical solutions that will allow us to achieve the objective of protecting and enhancing the water quality. Please advise if you are willing to do so. Thank you.

If you have any questions or concerns regarding this matter, please do not hesitate to contact me.

Respectfully,

Craig K. Hebebrand, P.E.,

Ohio Department of Transportation, District 12
 5500 Transportation Boulevard, Garfield Heights, Ohio 44125
 Telephone: (216) 581-2333, Ext. 409/NEW Facsimile: (216) 584-3508
 E-Mail: craig.hebebrand@dot.state.oh.us

See attached document relative to my thoughts on an environmental goal.

Lester Stumpe
Manager of Watershed Programs, Policy and Technical Support
Phone: 216-881-6600 Ext. 830
Fax: 216-881-6603
Email: stumpeL@neorsd.org

>>> "Craig Hebebrand" <Craig.Hebebrand@dot.state.oh.us> 03/19/03 09:43AM >>>
Lester,

At the March 10, 2003 Scoping Committee meeting you suggested that consideration be given to modifying the Goals and Objectives to specifically include Water Quality. While the Goal and Objectives for the Cleveland Innerbelt Study do not specifically mention Water Quality, they do include (see below) the broader objective to "preserve and enhance the natural environment." Please advise if you consider this more general objective to be sufficient to address your concerns. If not, I would ask you to offer a proposal to revise the Goals & Objectives.

Goal V Environment

Environmental impacts are often considered as a consequence of the construction of transportation facilities. This goal considers resource usage from fuel consumption to land uses. It also considers impacts to valued community resources such as residential areas, historic structures and districts, parks, or special population groups. While this goal category may have limited performance measures, it is extensively supplemented by the environmental impact evaluations conducted as part of the environmental studies for specific projects.

Objectives

1. Preserve, protect, and expand parks and open space throughout the corridor (lakefront, the river, and within the neighborhoods)
2. Adhere to Executive Order 12898 on Environmental Justice
3. Protect historic resources
4. Provide for business relocation within the study area
5. Protect and enhance the natural environment
6. Improve and enhance lighting
7. Include environmental considerations within the life-cycle cost analysis

Please note that I believe that the existing general objective is sufficient and would suggest that your concerns might best be addressed through the mutual development of appropriate performance measures related specifically to Water Quality.

If you have any questions regarding this matter or if you require any additional information, please do not hesitate to ask.

Respectfully,

Craig K. Hebebrand, P.E.,

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5500 Transportation Boulevard, Garfield Heights, Ohio 44125
Telephone: (216) 581-2333, Ext.409/NEW Facsimile: (216) 584-3508
E-Mail: craig.hebebrand@dot.state.oh.us

ATTACHMENT

Craig,

I thought about trying to incorporate the objectives that I envision in this new goal with existing Goal V. While I would be willing to try, I felt that it would muddle the intent particularly at the early stage of discussion.

Goal --- Reduce and mitigate impacts of highway run off and habitat disruption

Transportation replacement and/or re-construction projects offer the opportunity to construct facilities that have less environmental impacts than current systems. Decreased water quality impacts and improved habitat features (including decreased wildlife mortality incidents and increase compatibility with surrounding urban features) are two areas in which significant gains may be possible. Transportation replacement and/or re-construction projects also offer the opportunity to provide mitigation for the direct impacts of the transportation system that cannot be eliminated by context-sensitive design processes. The intent of this goal is to identify at the earliest possible juncture the steps that can be taken to meet the stated objectives. Identifying issues and possible actions may be a factor in developing and/or refining transportation options at the planning level. Consideration of environmental enhancement opportunities in the MIS phase will also allow the transportation planning process to consider the potential project costs associated with environmental measures and will help assure that the recommend plan identifies any options that should be considered in additional depth in the next phases of the transportation planning process. Measures of performance to evaluate planning level options against this goal are likely to be more qualitative than quantitative in nature. This general goal is consistent with NOACA transportation planning principles that call for transportation project to result in enhancements to the natural environment.

Objectives

1. Create and/or consider planning level options with the objective of minimizing and/or treating the pollutant loads that are created by stormwater run off from the highway corridor.
2. Create and/or consider planning level options with the objective of minimizing transportation related spills that might damage the ecology of area water resources. Identify any particular merits of transportation options to capture or otherwise minimize the impacts of spilled hazardous materials.
3. Evaluate at a planning level the opportunities and costs to provide long term environmental mitigation for the impacts of the transportation project that cannot be eliminated.
4. Consider opportunities, benefits and urban compatibility issues for natural habitat improvements associated with transportation options and potential environmental mitigation projects.

The existing environmental goal for the Inner belt study is as follows

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7. Include environmental considerations within the life-cycle cost analysis



February 9, 2004

Mr. David Coyle
District Deputy Director
Ohio Department of Transportation, District 12
5500 Transportation Boulevard
Cleveland, Ohio 44125

Dear Mr. Coyle:

A strong and varied transportation infrastructure has long been recognized as one of the strongest assets of the Greater Cleveland Area. We are excited to work with the Ohio Department of Transportation and area stakeholders to further improve the transportation system via improvements to the Cleveland Innerbelt and connecting projects.

We note that our water resources, particularly Cleveland's lakefront, are also increasingly being recognized as dominant assets of the region. Accordingly, large investments of public dollars are being made to protect and restore the area's water resources. For instance, NEORSR anticipates spending between \$1.3 billion to \$1.5 billion to control Combined Sewer Overflows (CSOs) in its service area. Additionally, the City of Cleveland is doing extensive renewal planning to capitalize on a cleaned-up waterfront. But CSOs are not the only problem. Stormwater runoff, including highway runoff, is one of the significant lakefront pollution sources. If all major sources of pollution, including highway runoff, are not addressed in a comprehensive and coordinated fashion, large public investments for pollution control will not achieve the optimum result of a cleaner, more usable lakefront.

The Innerbelt project planning process represents a critical point in time for community representatives and public officials to affirm that projects involving public investments must address both existing and new sources of project-related pollution that affect Cleveland's lakefront and other valued regional water resources. For the Innerbelt project, this would likely include addressing the problem of runoff from current pavement area and controlling stormwater pollution from the new elements of the Innerbelt project. As the Innerbelt project is in the early planning phases, we are aware that studies have not been conducted to determine the impacts of runoff from either the current or proposed highway infrastructure. As well, the cost of treating these sources of stormwater is not yet known. We understand that much of the work to balance cost and benefits of pollution control will be done in the forthcoming project phases of preliminary engineering and environmental assessment.

Mr. David Coyle
February 9, 2004
Page 2

Given the potentially significant costs of pollution abatement we suggest that it is beneficial to discuss funding sources at the earliest possible juncture. Fortunately, the Transportation Equity Act for the 21st Century (TEA-21) provides for federal participation in the cost of environmental restoration and pollution abatement projects using Surface Transportation Funds (STP). The Federal Highway Administration's fact sheet on TEA-21 STP funds identifies that eligible activities specifically include "environmental restoration and pollution abatement projects, including retrofit or construction of stormwater treatment facilities (limited to 20% of the total cost of 3R-type transportation projects)."

As you are aware, because comprehensive stormwater management is a new and developing discipline in Ohio, regulatory requirements and programs are not fully developed. The result is a significant project management challenge for such a large project as reconstruction of the Cleveland Innerbelt. Further, regulatory requirements are not the only measure of prudent cost-effective decision-making for stormwater management, pollution abatement, and environmental restoration work. As a result, we feel there will be a continuing need to consult and dialogue with the community with respect to decisions regarding the appropriate level of environmental controls.

In an effort to build consensus around the issues of comprehensive stormwater management and pollution abatement, we suggest the following steps:

- 1) Assure that abatement of existing stormwater sources of pollution is well documented as an objective of the Innerbelt project. Include this objective in the project's official Purpose and Need Statement to the extent that doing so will help to maximize the eligibility of abatement and environmental restoration activities for cost sharing using STP funds or other state or federal funds and communicate this important need to stakeholders.
- 2) Assure that the environmental assessment phase of the project development is adequately scoped and funded to provide a database from which to make sound decisions regarding pollution abatement, to identify environmental restoration opportunities, and to provide for comprehensive management of stormwater runoff.
- 3) Collaborate with stakeholders to develop and evaluate a range of options for stormwater management and potential environmental restoration activities. Include options to control project related pollutants (from both existing and new sources) to levels which support identified or anticipated community uses of the lakefront, recognizing that these levels may not currently be defined as regulatory requirements.

Mr. David Coyle
February 9, 2004
Page 3

- 4) Take reasonable steps to advocate and secure the eligibility of pollution abatement and environmental restoration activities to use STP funds and other potential state or federal funding opportunities. Communicate to the stakeholders roles they can play to support this process.
- 5) Identify opportunities for pollution abatement and environmental restoration activities that could be effectively coordinated with the Innerbelt project but which might not be eligible for state and federal funding support.

In crafting our suggestion we have tried to draw on the principles of strong public involvement, regional collaboration, and community consensus building. On this note, it is appropriate to recognize the outstanding efforts by your office throughout the Cleveland Innerbelt Study in the aforementioned areas. Your commitment to an inclusive process gives us assurance that you will continue to work with the community to address the issues that we have raised and to forge consensus as the project moves forward.

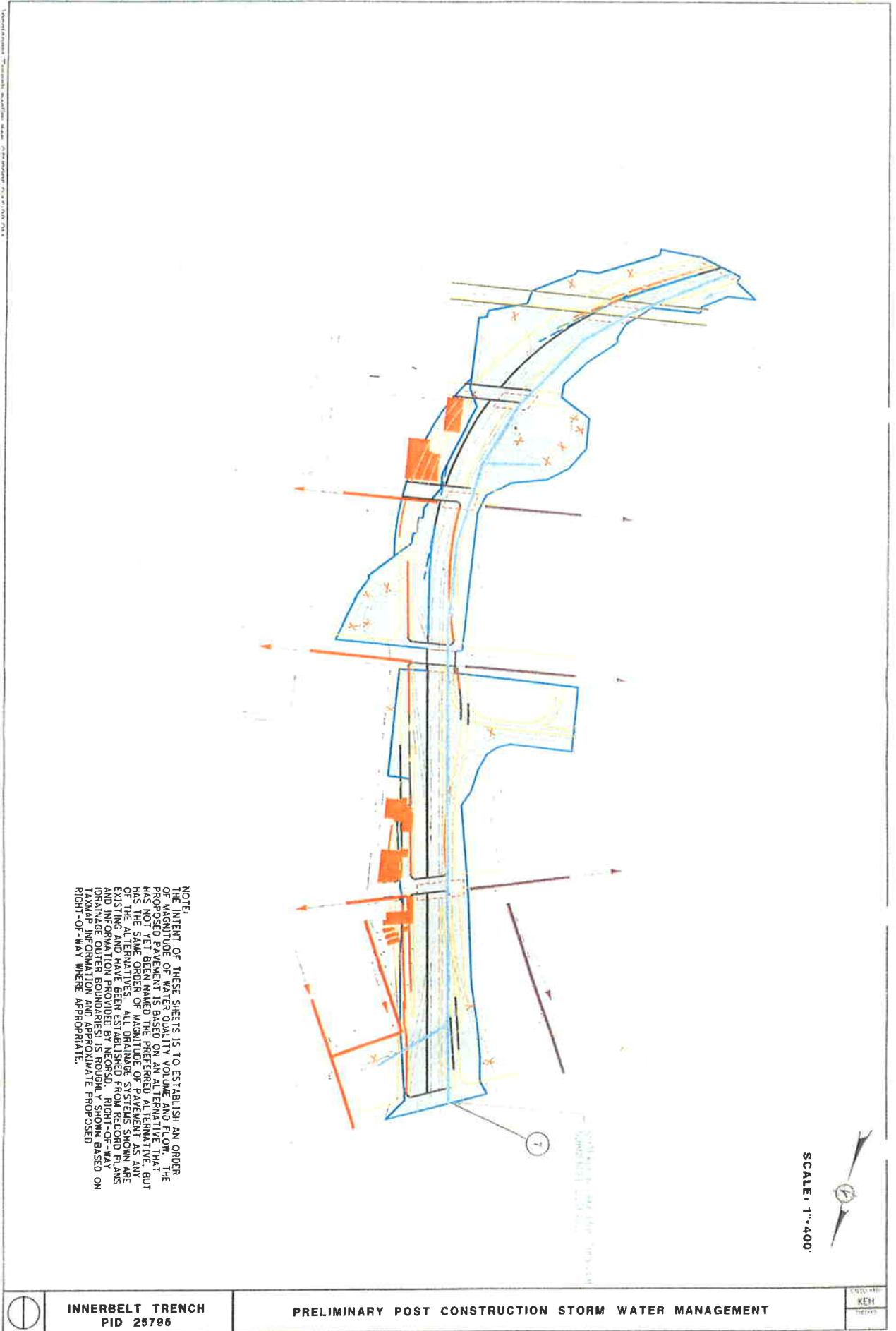
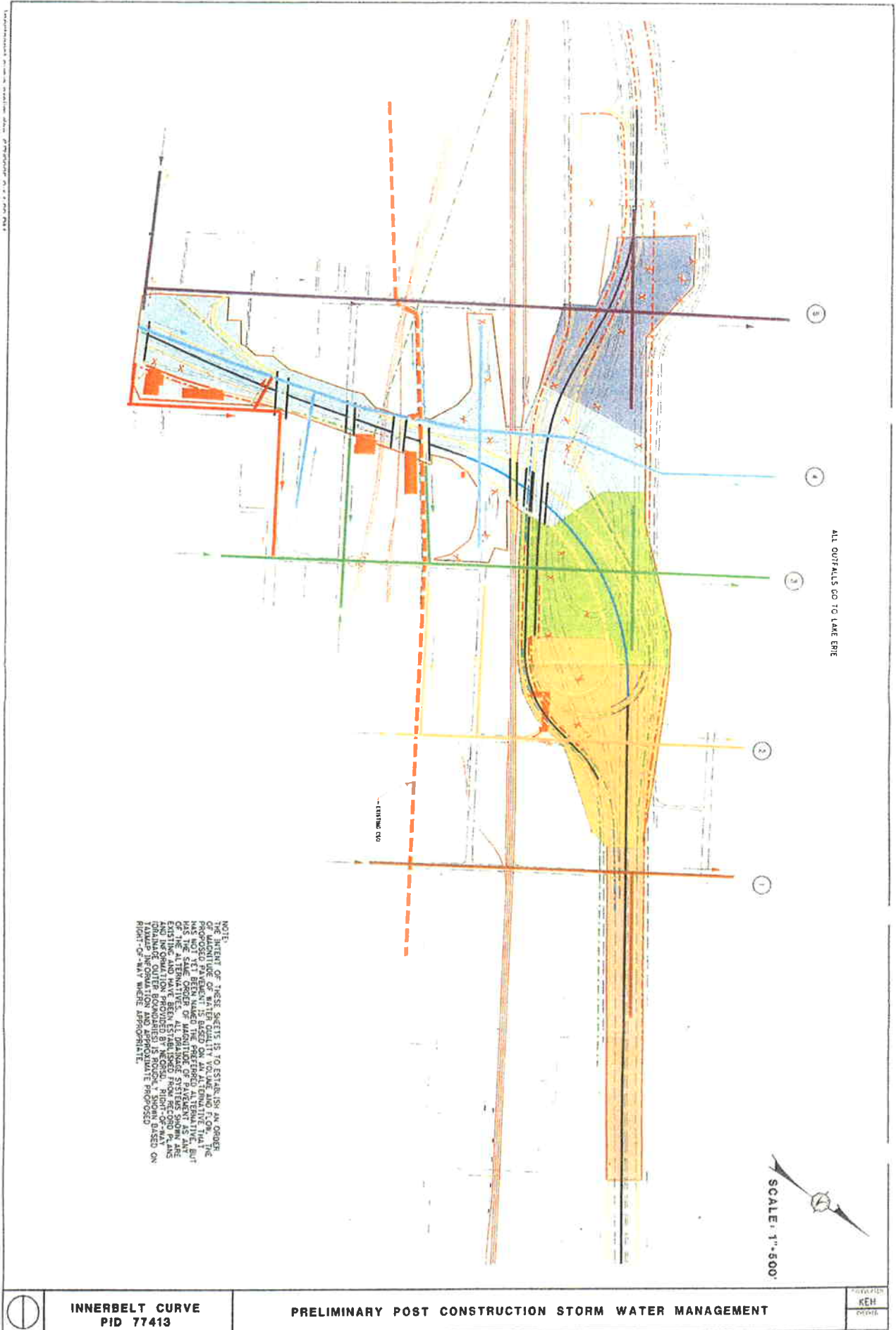
Additionally, as a partner in maintenance and enhancement of the region's infrastructure we are happy to meet with you to share our data on stormwater and to coordinate our pollution abatement projects with your plans for Innerbelt transportation improvements. We believe that close collaboration can be important in our joint efforts to help build a vibrant and attractive community.

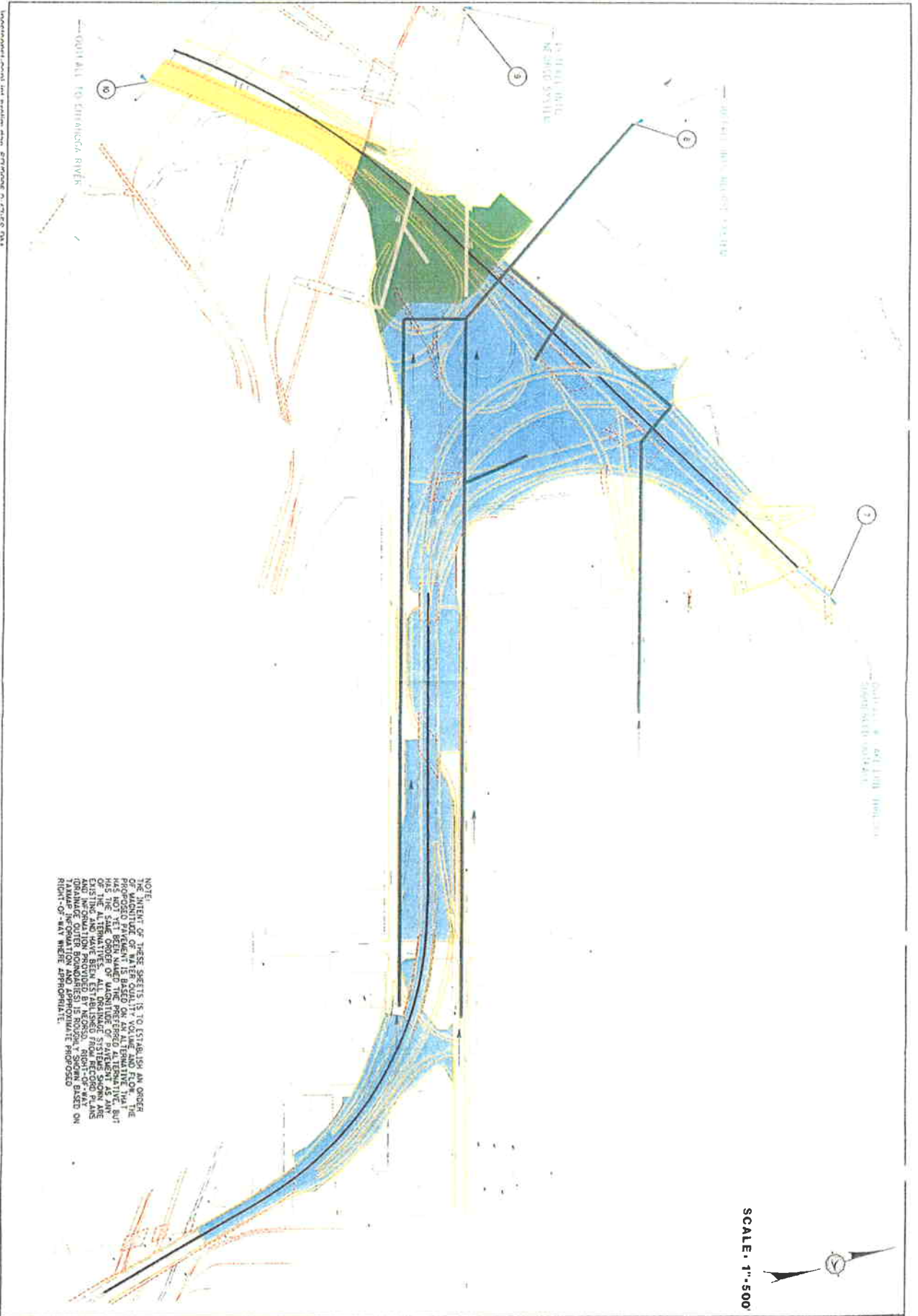
Sincerely,



Erwin J. Odeal
Executive Director

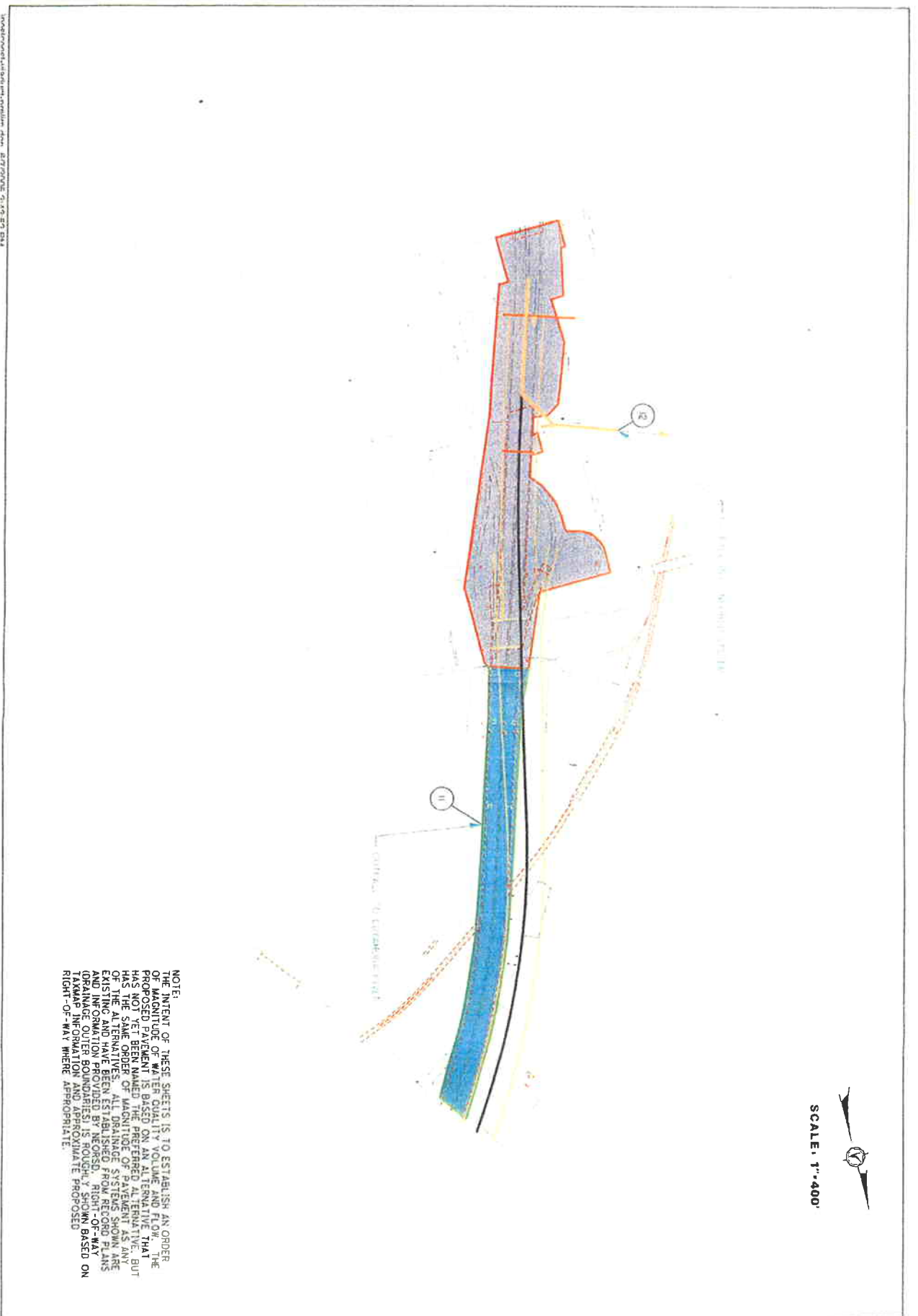
las/nas





NOTE:
 THE INTENT OF THESE SHEETS IS TO ESTABLISH AN ORDER OF MAGNITUDE OF WATER QUALITY VOLUME AND FLOW. THE PROPOSED PAVEMENT IS BASED ON AN ALTERNATIVE THAT HAS THE SAME ORDER OF MAGNITUDE OF PAVEMENT AS ANY OF THE ALTERNATIVES. ALTERNATIVE SYSTEMS, CONDUITS AND INFORMATION PROVIDED BY RECORD, RIGHT-OF-WAY DAMAGE, CONSTRUCTION AND APPROPRIATE PROGRAMS BASED ON RIGHT-OF-WAY WHERE APPROPRIATE.

SCALE: 1"=500'



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SCALE: 1"=400'

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1300 East 9th Street, Suite 612
 Cleveland, OH 44114
 (216) 241-9600 X24
 (216) 241-2524 (fax)

Northeast Ohio Regional Sewer District
 George J. McMonagle Administration Building
 3900 Euclid Avenue
 Cleveland, OH 44115

RE: CUY-Innerbelt Corridor
 PID No. 77510
 Existing ODOT Drainage
 Additional Information

Attention: Richard Switlaski, PE

September 2, 2005


Dear Mr. Switlaski:

Burgess & Niple, Inc. (B&N) is sending this letter and graphical information to the Northeast Ohio Regional Sewer District for your review and comment. The Ohio Department of Transportation and B&N/URS Team will be scheduling a meeting soon to discuss the existing storm drainage systems and how ODOT storm water interacts with the District's system.

This graphics show the layout of the existing condition for ODOT drainage and how and where it outfalls. This information was gathered for use in the ODOT Location and Design Vol. 2 - Section 1115 - Post Construction Storm water Best Management Practice Policy.

If you have any questions or require additional information, please do hesitate to contact me.

Respectfully,


 Burgess & Niple, Inc.
 Cleveland Transportation Manager
 Kevin Schlereth, PE

9/10/05 1pm - DRL asked Kevin to add street names to these sheets and resend to DR & NEORSD

cc: File
 Frank Greenland - Northeast Ohio Regional Sewer District
 Dave Lastovka - Ohio Department of Transportation - D12

77510 NEORSD_itr_BN_Schler_090205 - Information for Meeting





Dave
Lastovka/Production/D12/OD
OT
09/06/2005 01:30 PM

To Frank Greenland, Richard Switalski
cc KSchlereth@burnip.com, Craig
Hebebrand/Production/D12/ODOT@ODOT, George
Soos/Production/D12/ODOT@ODOT, Mark
Carpenter/Planning/D12/ODOT@ODOT

bcc

Subject CUY-Innerbelt Corridor; PID 77510; Conceptual Drainage

Frank/Rick,

You will receive a package (probably today) from B&N concerning the Innerbelt drainage. (Attached is the cover letter) This information is meant to help open up discussions between our offices on how our proposed Innerbelt construction projects interact with the existing combined sewer system. (You will be getting updated drawings from B&N in the near future, as I have asked B&N to add cross street information to these color drawings.)

In the mean-time, I'd like to try to schedule a meeting between our organizations to discuss our project. Here is a draft agenda:

1. Introductions
2. Overview of existing Innerbelt Drainage
3. General Discussion on the process of addressing each Innerbelt "watershed area". (Would include a discussion on what criteria should be considered when determining if watershed areas should be removed from the existing combined sewer system.)
4. General Discussion of Stormwater BMP for water quality (OEPA requirements are different for areas draining to Cuyahoga River and/or Lake Erie, vs connecting into the existing combined sewer system.) As you may know, Lester Stumpe of your organization has expressed significant interest in how the Innerbelt handles stormwater runoff.
5. Specific Discussions on long-term status of CSO 097, which is the existing I-90 storm sewer outfall pipe. Long-term status of Regulator E-11. (Will CSO 097 be tied to the new Lakefront Interceptor? Ownership of pipe north of I-90 right of way. In the future, will CSO 97 be wholly an ODOT storm sewer outfall, or will it continue to be used jointly by ODOT and NEORSR (for Easterly overflows).
6. Other Topics



pid77510_2005-09-02 transmit of conceptual drainage maps to neorsd.pdf

I was considering trying to meet either the week of Sept 19, or Sept 26. Please let me know when you might be available these weeks.

Thanks. Both of our organizations are planning to make significant investments in our infrastructure and we want to make sure that we are all on the same page.

Dave

David Lastovka, P.E.
ODOT D-12 Production
5500 Transportation Blvd
Garfield Hts, Ohio 44125
216-584-2115
216-584-2279 FAX
E-Mail: dave.lastovka@dot.state.oh.us



1300 East 9th Street, Suite 612
Cleveland, OH 44114
(216) 241-9600 X24
(216) 241-2524 (fax)

Northeast Ohio Regional Sewer District
George J. McMonagle Administration Building
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Cleveland, OH 44115

RE: CUY-Innerbelt Corridor
PID No. 77510
Existing ODOT Drainage
Additional Information

Attention: Richard Switalski, PE

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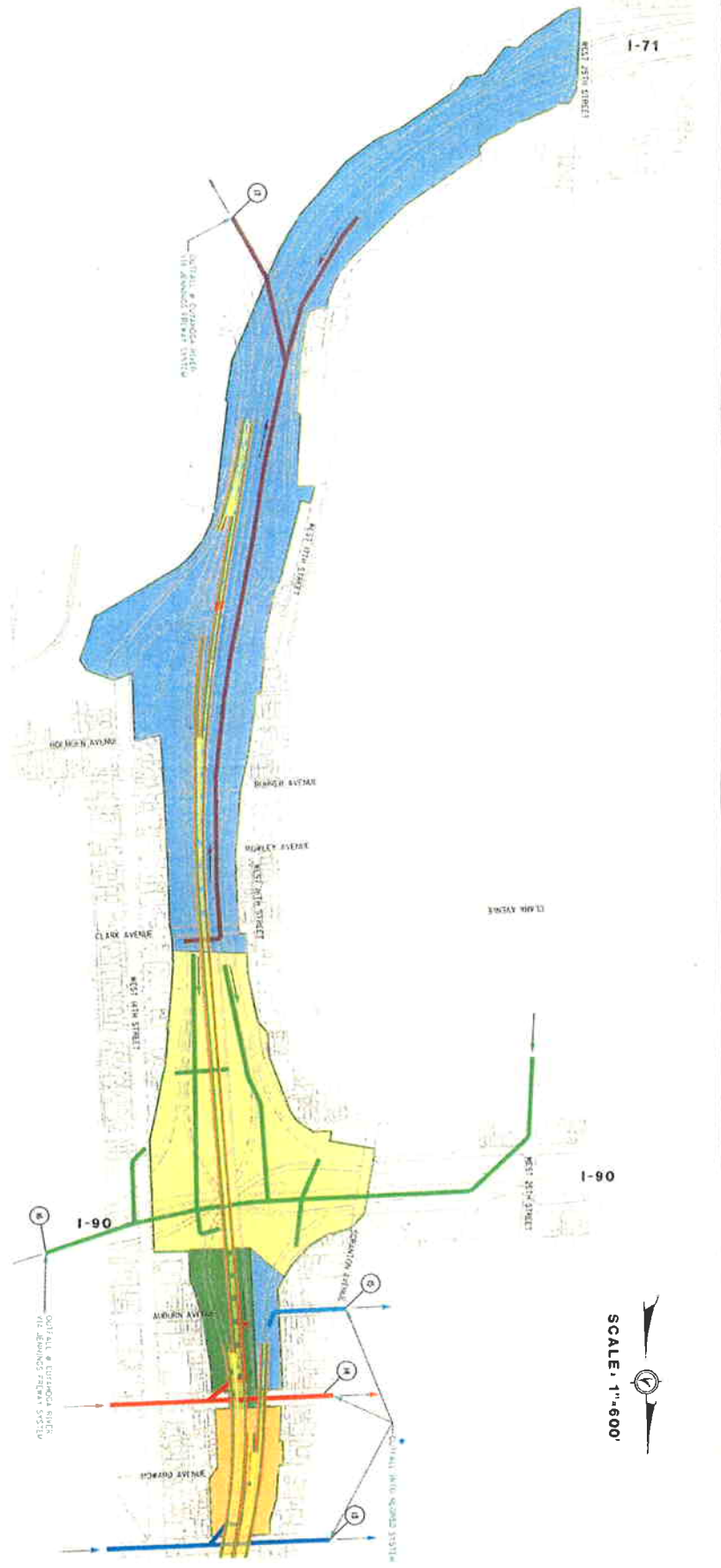
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cc: File
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Dave Lastovka - Ohio Department of Transportation - D12

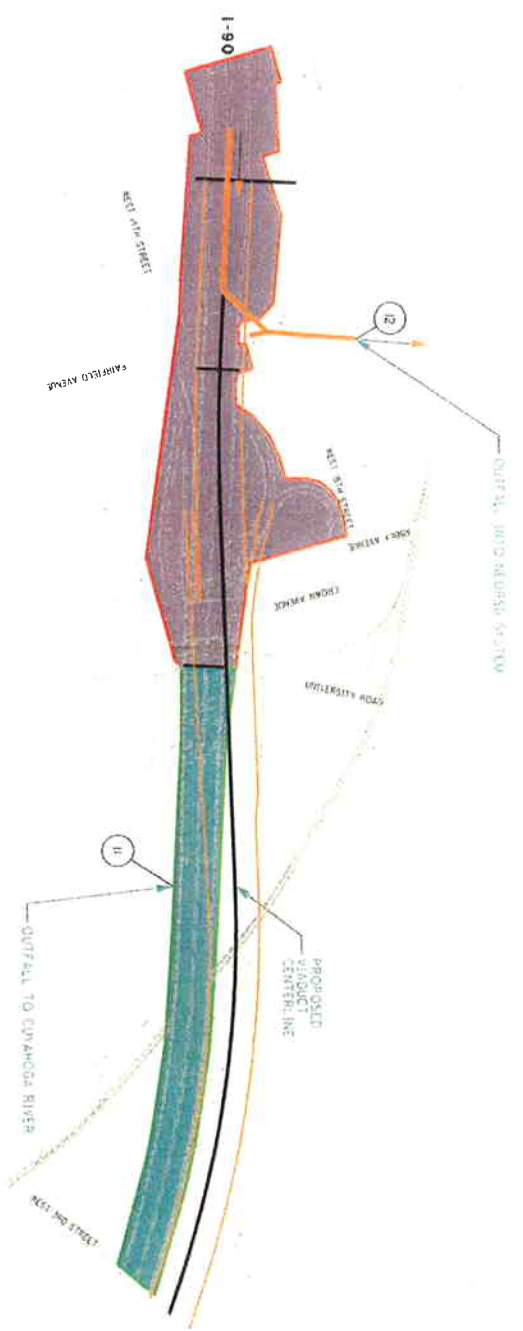
77510 NEORSR_itr_BN_Schler_090205 - Information for Meeting

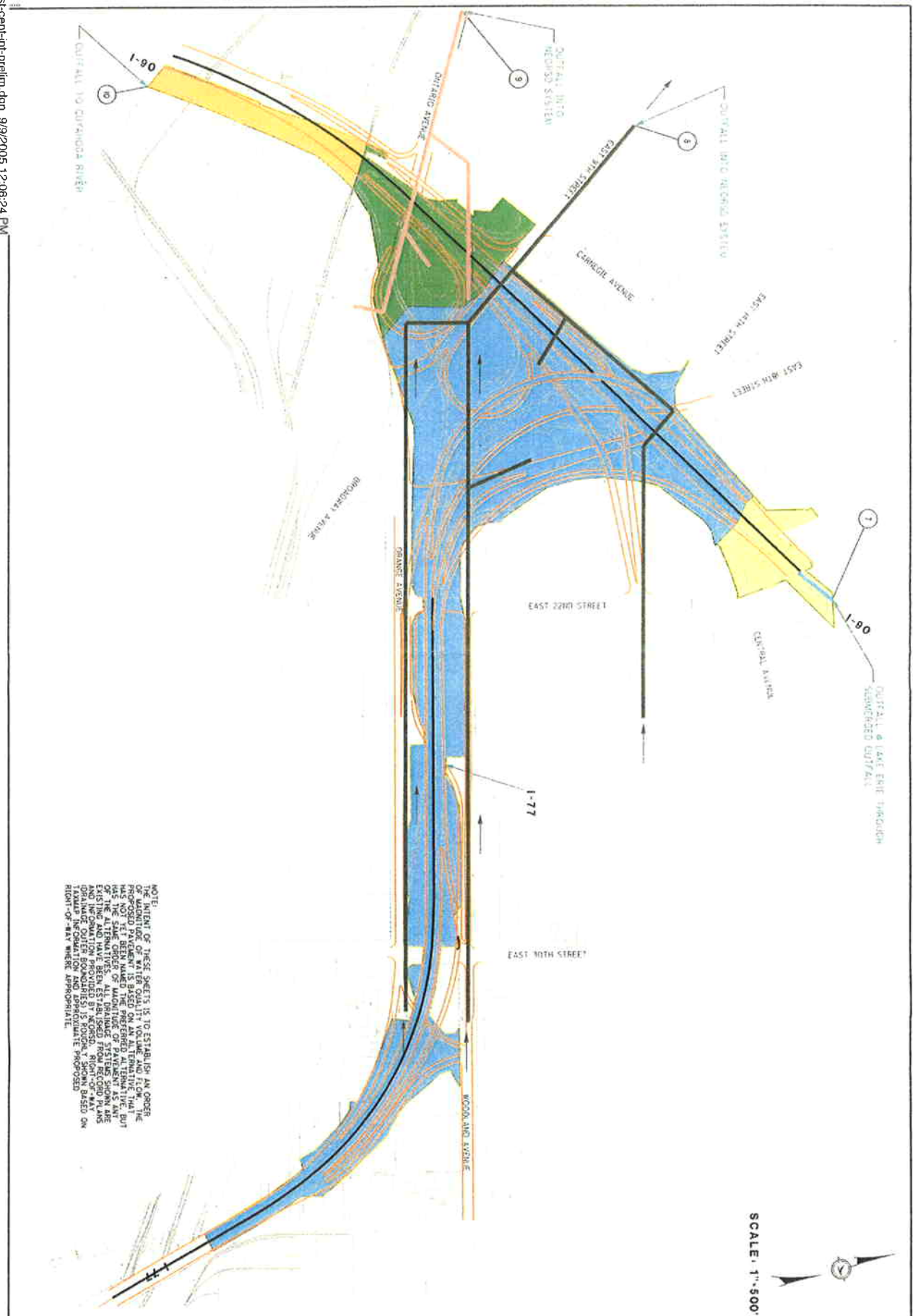
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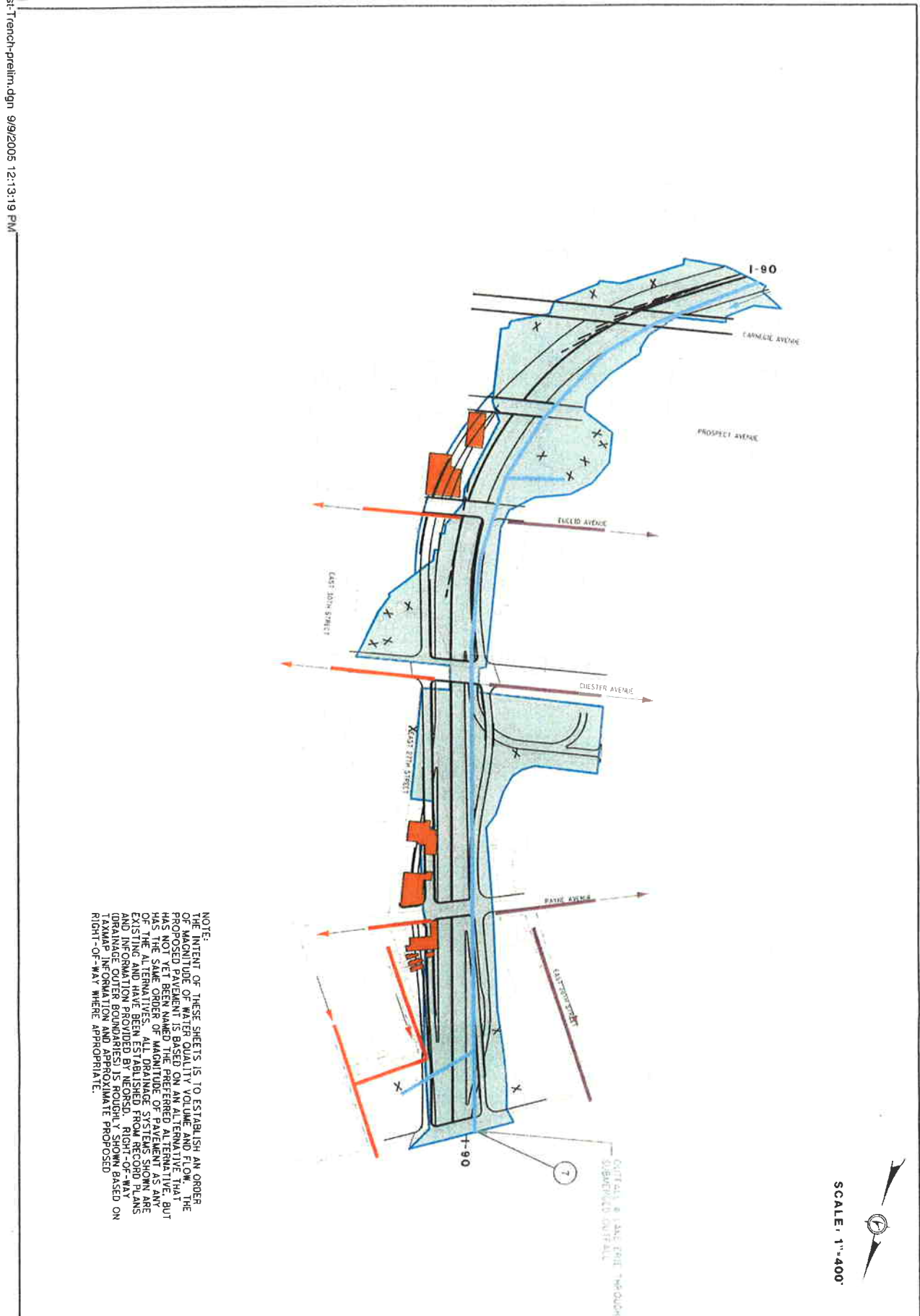
NOTE: THE INTENT OF THESE SHEETS IS TO ESTABLISH AN ORDER OF PRIORITY FOR THE PROPOSED STORM WATER MANAGEMENT SYSTEMS. THE PROPOSED PAVEMENT IS BASED ON AN ALTERNATIVE THAT HAS NOT YET BEEN NAMED THE PREFERRED ALTERNATIVE, BUT OF THE ALTERNATIVES, ALL DRAINAGE SYSTEMS SHOWN ARE EXISTING AND HAVE BEEN ESTABLISHED FROM RECORD PLANS (DRAINAGE OUTER BOUNDARIES) IS ROUNDER, SHOWN BASED ON RECORD INFORMATION AND APPROXIMATE PROPOSED RIGHT-OF-WAY WHERE APPROPRIATE.

CENTRAL INTERCHANGE
PID TO BE DETERMINED

PRELIMINARY POST CONSTRUCTION STORM WATER MANAGEMENT

ENGINEER
KEH
DATE

D 10



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INNERBELT TRENCH
PID 26795

PRELIMINARY POST CONSTRUCTION STORM WATER MANAGEMENT

ENGINEER
KEH
DATE

SCALE: 1"=400'

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NOTE:
 THE INTENT OF THESE SHEETS IS TO ESTABLISH AN ORDER OF MAGNITUDE OF WATER QUALITY VOLUME AND FLOW OF STORMWATER DRAINAGE FROM THE INNERBELT CORRIDOR. THIS HAS NOT YET BEEN NAMED THE PREFERRED ALTERNATIVE, BUT HAS THE SAME ORDER OF MAGNITUDE OF PERFORMANCE AS ANY OTHER ALTERNATIVE. THE INFORMATION PROVIDED IN THESE SHEETS IS FOR INFORMATION AND APPROXIMATE PROPOSED RIGHT-OF-WAY BOUNDARIES APPROXIMATE.

Dave Lastovka /Production /D12/ODOT
 09/13/2005 04:22 PM

To greenlandf@neorsd.org, switalskir@neorsd.org
 cc Craig Hebebrand/Production/D12/ODOT@ODOT, KSchlereth@burnip.com, Mark Carpenter/Planning/D12/ODOT@ODOT, George Soos/Production/D12/ODOT@ODOT
 bcc
 Subject Fw: CUY-Innerbelt Corridor; PID 77510; Conceptual Drainage

Frank/Rick,
 Hopefully you received the 9/9/05 updated sheets from B&N. they include street names.
 Can we work on scheduling a meeting to discuss these issues ?

Thanks,
 Dave
 — Forwarded by Dave Lastovka /Production /D12/ODOT on 09/13/2005 04:20 PM —

Dave Lastovka /Production /D12/ODOT
 09/06/2005 01:30 PM

To Frank Greenland, Richard Switalski
 cc KSchlereth@burnip.com, Craig Hebebrand/Production/D12/ODOT@ODOT, George Soos/Production/D12/ODOT@ODOT, Mark Carpenter/Planning/D12/ODOT@ODOT
 Subject CUY-Innerbelt Corridor; PID 77510; Conceptual Drainage

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6. Other Topics



OHIO DEPARTMENT OF TRANSPORTATION

District 12, 5500 Transportation Blvd. Garfield Heights, Ohio 44125-5396

Phone (216) 581-2100, Fax (216) 584-2279



pid77510_2005-09-02 transmit of conceptual drainage maps to neorsd.pdf

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216-584-2279 FAX
E-Mail: dave.lastovka@dot.state.oh.us

LOCATION: NEORS D OFFICE TIME: 1:30pm DATE: 10/4/2005

PROJECT: CUT INNERBELT CORRIDOR, PID 77510

SUBJECT: NEORS D / ODOT COORDINATION

ATTENDEES (Please Print)

NAME	ORGANIZATION	PHONE/EMAIL
DAVID LASTOVKA	ODOT D12	216 584-2115 dave.lastovka@dot.state.oh.us
Joseph Seif	ODOT D12	216 584-2120 jseif@dot.state.oh.us
CRIG HERBERAND	ODOT D12	216 584-2113 chebera@dot.state.oh.us
GEORGE SOOS	ODOT D12	216-584-2118 65005 @ DOT.STATE.OH.US
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Kevin Hutchens	B+N	440-354-9700 / khutchens@burnip.com
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Bob Ericsson	NEORS D	216-881-6600 / bericsson@neorsd.org
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MARK McCABE	URS	614-464-4500 mark.mccabe@urscorp.com
Frank Greenland	NEORS D	216-881-6600 greenlandf@NEORS D.ORG
John M. Motl	ODOT D-12 Planning	216-584-2085 john.motl@dot.state.oh.us

PID: _____

Ohio Department of Transportation/ Northeast Ohio Regional Sewer District
Cleveland Innerbelt Corridor Project:
PID 77510
Combined Sewer Outfalls (CSO) and Project Storm Water Run-off Issues.

AGENDA

October 4, 2005, 1:30 PM , NEORSD Offices

1. Introductions
2. Overview of existing Innerbelt Drainage (B&N) (See 9/9/05 Transmittal from B&N with color project maps)
3. General Discussion on the process of addressing each Innerbelt "watershed area".
4. General Discussion of Storm water runoff to Cuyahoga River and Lake Erie.
5. Specific Discussions on long-term status of CSO 097, which is the existing I-90 storm sewer outfall pipe. Long-term status of Regulator E-11.
 - a. Will CSO 097 be tied to the new Lakefront Interceptor?
 - b. Ownership of pipe north of I-90 right of way?
 - c. In the future, will CSO 97 be wholly an ODOT storm sewer outfall, or will it continue to be used jointly by ODOT and NEORSD (for Easterly overflows)
6. Status of Easterly Interceptor Relocation within I-90 RW at Lakeside
→ B&N working on CSO/NS justification
7. Other Topics:

Nov 2005 PDP 536

Step 7 - 12 months - verification of preferred alternative

Updated ODOT storm water design policy

Fixed amount of storm water established

4 or less times per year

* 1.6 billion dollar plan to achieve this

Baseline -

Finding and Recommendations Report of the Transwac Innerbelt Work
Group
3/20/2006

Transwac Innerbelt Work Group Findings:

1. There is reasonable evidence to suggest that untreated runoff from the Innerbelt may have deleterious effects on the aquatic and ecological health of the Cuyahoga River, and nearshore waters of Lake Erie. Attachment A provides supporting documentation for this conclusion.
2. The Department of Transportation for the State of Washington and CALTRAN have developed models for assessment of water quality impacts which may prove useful in more specifically assessing the impacts on water quality of the proposed Innerbelt facility. (Representative materials documenting these processes are assembled at an ftp site developed by the Transwac work group.)
3. Engineering decisions regarding the Innerbelt drainage systems and the treatment of runoff are likely to affect the feasibility of future options to provide for high levels of treatment of storm water, should new treatment requirements be determined necessary.
4. A substantial portion of the Innerbelt project will be constructed on elevated structures. This creates special problems related to storm water runoff management, and requires careful consideration in the planning and design of these structures. (It is noted that the National Cooperative Highway Research Program report "Assessing the Impact of Bridge Deck Runoff Contaminants in Receiving Waters" provides detailed guidance for assessing impacts and developing runoff management programs.)
5. The Greater Cleveland Community is embarking on a major capital program to control combined sewer overflows and is in the process of establishing new standards to control storm water for development and redevelopment projects as a measure to protect the ecological health of the area water resources.

Recommendations for the Conduct of the Innerbelt Project Development Process:

1. The Project Development Process (PDP) is encouraged to evaluate the likely environmental impacts (i.e., water quality and aquatic ecological impacts) attributable to highway runoff and develop storm water management practices that are responsive to the particular environmental concerns of the applicable receiving waters.
2. In as much as untreated runoff from the proposed Innerbelt facility appears to have the potential to cause environmental harm and may result in the violation of water quality standards the PDP should consider treatment of all runoff from the reconstructed facility, as opposed to only providing treatment for volumes of