



Department of Health

ANDREW M. CUOMO
Governor

HOWARD A. ZUCKER, M.D., J.D.
Commissioner

SALLY DRESLIN, M.S., R.N.
Executive Deputy Commissioner

October 16, 2015

David S. Warne
Assistant Commissioner
NYC Department of Environmental Protection
Bureau of Water Supply
465 Columbus Avenue
Valhalla, NY 10595

Dear Mr. Warne:

NYSDOH and USEPA have reviewed the Revised 2007 FAD deliverables that were due August 31, 2015. Our comments are attached. We would appreciate if you could provide a reply to these comments by November 20, 2015.

Please feel free to contact me if you have any questions.

Sincerely,

Pamela L. Young, Ph.D.
Chief, NYC Watershed Section
Bureau of Water Supply Protection

Att.

Cc (electronic):

R. Sokol
T. Boepple-Swider
P. Sweeney – USEPA
K. Kosinski – NYSDEC

DOH/EPA Comments on FAD Deliverables due August 31, 2015

4.6 Stream Management Program

The Revised 2007 FAD requires DEP to annually convene an office-based progress meeting with NYSDOH/USEPA and NYSDEC by August 30 of each year. This meeting was held on August 25, 2015.

6.2 Wastewater Treatment Plant Compliance Inspection Reports Summary – 1st and 2nd quarters 2015

The semiannual Wastewater Treatment Plant Compliance Inspection Report was submitted as required by the Revised 2007 FAD. The deliverable is met.

NYSDOH/USEPA offer the following comments and requests for clarifications:

- The report indicates (p.7) that in early spring Boiceville WWTP experienced infiltration and inflow (I & I) issues during high precipitation events, which allegedly resulted in operational problems and certain SPDES exceedances. DEP has worked with the facility, its new Chief Operator, and its consultant to address the physical and operational parameters that led to the exceedances, and treatment processes have been correspondingly adjusted. We commend DEP for its active role in facilitating the steps necessary to bring this plant into compliance.

However, the report indicates that there may be unresolved issues such as excessive inflow from sump pumps and excessive grease from commercial users, and suggests that these issues should be addressed by the Town. Please provide an update regarding any additional information obtained on the sources of the I & I and efforts to reduce grease inputs to the plant.

- Inspection report on the Carmel SD#2 (p.41) notes the conclusion of the PALL pilot testing period. The pilot test was commissioned under the Regulatory Replacement Program to investigate replacement of the existing Siemens' continuous microfiltration (CMF) units with state-of-the-art PALL CMF units. We acknowledge DEP's continuing efforts to improve the effectiveness and efficiency of wastewater treatment plants in the Watershed.
- As reported (p.41), sewage overflow from the Carmel SD#1 lift station had reached an "unnamed tributary that flows to the Croton Falls Reservoir". Provide information on approximate distance from where the overflow reached the tributary to the Croton Falls Reservoir. Were any impacts on reservoir water quality detected?

6.2 Wastewater Treatment Plant Water Quality Sampling Monitoring Semiannual Report (January 1 – June 30, 2015)

The semiannual report on water quality sample monitoring of the NYC-owned and non-City-owned WWTPs was submitted as required by the Revised 2007 FAD. The deliverable is met.

Additional information/clarification is requested for the following items:

- Water samples collected on June 10, 2015 at the Olive Woods WWTP (p.19) showed exceedances in TSS, turbidity, and fecal coliforms. Samples collected on June 17, 2015 and comments provided in the inspection report (p.28) showed SPDES compliance. Provide additional information regarding identified or suspected causes of the exceedances recorded on June 10, 2015.
- Please provide available information on causes of flow exceedance at Walton WWTP reported on April 8, 2015 (p.24).