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Pamela Young, Ph.D.
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Phil Sweeney
United States Environmental Protection Agency - Region II
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New York, NY 10007-1866

Dear Dr. Young and Mr. Sweeney:

Enclosed is the DEP Response to NYSDOH/USEPA Comments on FAD Deliverables submitted August 31, 2014, in accordance with the Revised 2007 Filtration Avoidance Determination (FAD). These comment responses have a due date of November 7, 2014.

As always, if you have any questions about these comments or other aspects of the City's watershed protection efforts, please do not hesitate to contact me.

Sincerely,

David S. Warne
Assistant Commissioner

DEP Response to DOH/EPA Comments on the FAD Deliverable Reports
Submitted August 31, 2014
Response Date October 30, 2014

6.2 Wastewater Treatment Plant Compliance and Inspection Program

Two reports, the Wastewater Treatment Plant Compliance Inspection Reports, Summary – 1st and 2nd quarter 2014, and the Semiannual report on sample monitoring of the NYC-owned and non-City-owned WWTPs, were submitted as required by the revised 2007 FAD. The deliverable is met.

DEP Response:

Comment noted.

Both reports are well-organized and clearly demonstrate the effectiveness of programmatic implementation. Several SPDES permit exceedances necessitated the following inquiries:

The Boiceville WWTP inspection report shows "sporadic" violations of the SPDES permit limitations for ammonia, although persistent NH3 exceedances have been shown from January through May, 2014. The report also indicates that the facility is having I&I problems and some issues with the SBR malfunctioning. The Town has hired a consultant to investigate the issues with the SBR. Please provide additional information, once it is available from this investigation, regarding the reasons for NH3 exceedances and the SBR malfunctions.

DEP Response:

The NH3 exceedances at the Boiceville WWTP occur in the colder months of the year. They had four since January 2014 and one on May 6, 2014 that was slightly above the SPDES limit of 2.2 mg/l with a value of 2.37 mg/l. Since then they have not had any violations. Solids do not settle as well during the winter due to the cold influent and hydraulic overload caused by infiltration and inflow (I&I). There is a definite pattern of increased foam within the SBR (caused by fat, oil and grease) and reduced settling when the Onteora School is open and conveying wastewater to the plant. Over the summer months, solids' settling improves with no foam present. The school has the grease trap pumped out at the end of the school year and the operators are going to request it be done over the winter recess as well.

The report from the investigation has not been received from the consultant, Phil Smith; however, it may not contain any obvious reasons for the poor settling. Mr. Smith conducted jar testing but did not discover any additives that solved the problem. Multiple samples were sent to a water quality laboratory, their conclusion is the foam is not a filamentous bacteria problem.

DEP staff inspected the collection system in collaboration with the facility operator but has not been able to conduct any further I&I investigation due to a dry summer season with little to no rainfall events.

The reports show chronic performance issues, with multiple exceedances of the SPDES permit at the Mountainside Farms – Worcester Creameries (Lagoon) subsurface treatment facility, during the reporting period. The report also states that a full plant modification was completed on April 24, 2014 (functional completion). However, multiple exceedances in SPDES parameters were detected in May 2014. Please provide additional information explaining such post-plant-modification exceedances. Also, please advise if the damaged clarifier is being abandoned, or, if it is to remain in service, whether plans are in-place for repairs.

DEP Response:

Functional completion does not denote start-up of the new facility. It is an assertion by the facility engineer to the permittee and the relevant regulatory agencies that all plant equipment has been installed in accordance with approved plans and specifications and is always performed prior to initiating start-up. The plant was properly seeded and placed in service to process wastewater on June 30, 2014; they have not had any permit exceedances since then.

The clarifier will be decommissioned, it is not included as part of the treatment path of the modified facility.

Paragraph 2 of this report notes that: "The A and B [UV] units showed turbidity values of 1.0 and 2.1 mW/cm^2 respectively with 3171 running hours." For clarification, were these turbidity values or measures of UV intensity?

DEP Response:

This was a typographical error, the unit measures intensity.

DEP staff inspected the facility on October 16, 2014. Due to the improved effluent quality, the intensity values have increased to 8.5 and 10.1mW/cm^2, respectively.

Additional information regarding the source, if identified, of the *Giardia*-positive sample detected at the Hunter WWTP on January 15, 2014 will be appreciated. Is there a SOP developed at the WWTP to address the high flow seasonal management?

DEP Response:

There has been no new information related to the positive sample. DEP staff will verify if the facility will adjust process control of the tertiary filter, such as increased backwash rate for high flows or simply reducing the flow rate through each unit, during the winter peak season.