



November 20, 2015

**Emily Lloyd**  
*Commissioner*

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Dear Dr. Young and Mr. Sweeney:

Enclosed is the DEP Response to the NYSDOH/USEPA Comments on Revised 2007 FAD Deliverables submitted through August 2015.

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

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. S. Warne', with a long horizontal line extending to the right.

David S. Warne  
Assistant Commissioner

**DEP Response to NYSDOH/USEPA Comments on FAD Deliverable Reports**  
**Submitted August 31, 2015**  
**Response Date November 20, 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.

**DEP Response:**

**Comment noted.**

**6.2 Wastewater Treatment Plant Compliance Inspection Reports Summary – 1<sup>st</sup> and 2<sup>nd</sup> quarters 2015**

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

**DEP Response:**

**Comment noted.**

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.

**DEP Response:**

**Comment noted.**

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.

**DEP Response:**

**The plant experienced two major rain events since the operator reduced the PAC addition to less than half of the amount they were previously using. On 09/13/2015, the facility recorded over 5.5 inches of rain and an influent flow of 106,000 gallons. The plant ran flawlessly and did not experience any settling issues within the SBR, therefore, eliminating any sand filter issues. On 09/30/2015, the facility experienced a similar rain event (~ 5 inches). Since the plant can accommodate the subsequent hydraulic load without consequence, the operator was able to pull manhole covers to**

investigate possible sources of I&I. The first area they noticed excessive flow was at the bottom of Desilva Road behind the Coldwell banker building, a separated cleanout pipe was gushing in groundwater. The operator was able to seat the pipe into the y-connection and stop the infiltration, cutting off what they estimate as 15-20 gallons per minute (gpm) into the collection system. An inspection of the downstream manhole revealed a more normal flow. The operator observed a manhole located in front of the Coldwell banker building that was taking on water from around the manhole frame. The facility is currently looking into getting a contractor to provide estimates to repair the frame before winter. A check of the plant influent pump station revealed normal pump run cycles, an indicator that flow into the facility has stabilized. The operator is waiting for another rain event to investigate a section located along upper Boiceville Road. The operator will conduct an investigation of the local commercial users to ensure all grease interceptors are in use and properly maintained. DEP acknowledges these proactive accomplishments and feels confident the facility will continue to operate within its mandated parameters.

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.

**DEP Response:**

**Comment noted.**

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?

**DEP Response:**

**The lift station is located within two hundred feet of the Croton Falls Reservoir. Water quality testing was performed at Croton Falls indicating a fecal coliform increase at a reservoir site near the spill; however, since the spill was of short duration it is believed the contribution was contained in the cove area due to the causeway, and did not impact the reservoir significantly.**

**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.

**DEP Response:**

**Comment noted.**

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.

**DEP Response:**

**As reported, the WWTP Compliance and Inspection Group responded to a report from DEP laboratory of an unusual sample collected on June 10, 2015. An inspection conducted on June 12, 2015 revealed no abnormal conditions, tertiary systems were operational. The facility has no history of compliance issues. The high values for the June 10, 2015 water samples do not appear to be related to the plant operation.**

Please provide available information on causes of flow exceedance at Walton WWTP reported on April 8, 2015 (p.24).

**DEP Response:**

**The SPDES permitted flow limitation is based on a 30-day average. The flow listed in the table was an instantaneous flow record, as provided by the DEP laboratory. This instantaneous flow was higher than the permitted 30-day average but was not a violation or exceedance and is unrepresentative of plant performance. Flow varies throughout the month and an instantaneous record of flow does not qualify as an exceedance; therefore, instantaneous flows will be excluded from future tables to avoid confusion.**