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New York, NY 10007-1866

Dear Dr. Young and Mr. Sweeney:

Enclosed is the DEP Response to the DOH/EPA Comments on 2007 FAD Deliverables submitted through February 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 through February 28, 2014
Response Date April 29, 2014

FAD Deliverable Submitted January 31, 2014

4.6 Stream Management Program

As required by the 2007 FAD, the annual Partners meeting for the Stream Management Program was held on January 21, 2014. Please provide the list of attendees at the meeting and copies of any presentations made by DEP.

DEP Response:

The agenda for the January 21st Partners meeting is attached. There were no PowerPoint presentations. The meeting was attended by: Rick Weidenbach and Graydon Dutcher, DCSWCD; Jeff Flack and Abbe Martin, GCSWCD; Brian Brustman and Karen Rauter, SCSWCD; Adam Doan, UCSWCD; Leslie Zucker, CCEUC; Aaron Bennett, UCDOE; Beth Reichheld, Phil Eskeli, Danyelle Davis, Mark Vian, Dave Burns, and Chris Tran, NYC DEP.

FAD Deliverables Submitted February 28, 2014

6.2 WWTP Inspection Program

Wastewater Treatment Plant Compliance Inspection Reports

The summary report covering the 3rd and 4th quarters of 2013 was submitted as required by the 2007 FAD. The reports demonstrate that DEP staff took proactive steps to ensure that all noncompliance issues were resolved quickly and effectively. Several unsatisfactory ratings given to items during the 3rd quarter were changed to satisfactory during the 4th quarter inspection because necessary improvements had been completed (e.g. Prattsville WWTP, Timber Lake WWTP). We commend DEP for conducting a follow-up, post-season inspection at Oorah Camp WWTP to ensure that all necessary repairs were completed. The only facility that shows consistent unsatisfactory rating is the Hanah Country Club WWTP (Pepacton basin). Item D2 (Clarifier) at that facility received unsatisfactory ratings during the 3rd and the 4th quarter inspections. Both reports state that "the floc mixing unit is out of service". Additional information is needed regarding an anticipated date of improvement.

DEP Response:

The floc mixing unit is out of service and has been removed while the clarifier remains in operation. The exterior mounted motor and mixer shaft had been repaired multiple times, but did not hold up well due to prolonged exposure to the harsh winter elements. The operator stated that the chemical injection point in the feed pipe within the building provides enough natural mixing, and phosphorous removal is acceptable. He requested to eliminate the mixer completely or replace it with a static in-line mixer located inside the building. DEP and NYSDEC agreed to

allow an in-line static mixer to be installed to replace the present unit if it is necessary to ensure complete mixing for efficient operation. Both agencies will monitor phosphorus readings to confirm that chemical precipitation is adequate.

The summary includes a description of a raw sewage overflow at the Liftside Pump Station, Village of Hunter WWTP system. The report states that operators "saw a peak in the pump station flow meter and responded immediately" to remedy the problem. Nonetheless, an overflow occurred at a manhole. Further, the report seems to indicate that such overflows are not unusual, since there is reference to the need to use emergency trash pumps "as they normally do."

Please provide a short report on the history of sewage overflows in this area. Further, please evaluate the need for a remote monitoring system, similar to the Smart Cover technology currently in use at the Westchester County Westlake trunk sewer, to provide assurance that any future overflows will be promptly identified and remedied.

DEP Response:

This manhole routinely overflowed while servicing the Liftside WWTP. Once the plant was decommissioned in 2007 and the wastewater conveyed to the Hunter WWTP via the new lift station, DEP and the engineer recognized the hydraulic overload caused by infiltration and inflow (I&I) was greater than previously estimated. DEP purchased trash pumps and additional hosing in order to bypass the manhole during high flow periods. This has greatly reduced the severity and frequency of overflows.

The collection system was remediated in 2010 and a new section of piping installed, resulting in a substantial reduction in I&I. The reported overflow was the first in several years and was caused by heavy rains combined with the back wash flow from the drinking water plant.

DEP has requested that the operators investigate options within the pump station to increase the flow rate. A pump representative was at the site on January 14, 2014 to review the station settings and propose installation of a third pump to increase flow during peak demand. The outlet pipe is a six inch diameter line and is not a limiting factor. The Village of Hunter has received one quote and awaits several more.

The pump station is equipped with a high level alarm and remote dial-up system. The last overflow was caused by a malfunction within the alarm telemetry. The manufacturer was called immediately following the spill to repair the system. DEP does not believe a remote monitoring system similar to the Smart Cover units utilized at the West Lake Trunk Sewer will provide any additional benefit.

6.2 WWTP Inspection Program

Report on Sample Monitoring of NYC-owned and non-City-own WWTPs

The summary report covering the 3rd and 4th quarters of 2013 was submitted as required by the 2007 FAD. Additional information is requested regarding the following facilities:

Mountainside Farms. Although this is a subsurface discharging facility, multiple chronic BOD exceedances are concerning. The report states that Functional Completion was scheduled for February 2014. Please provide a status update.

DEP Response:

The facility has been under a DEC consent order. A full plant modification was required to be functionally complete no later than June 30, 2014, as the original completion date was extended. A successful functional completion inspection was performed on April 24, 2014.

Walton WWTP. On July 24, 2013, the effluent shows TNTC fecal coliforms. Please provide additional information regarding the identified or suspected cause of this event.

DEP Response:

The anomalous sample FC count is not supported by plant effluent data or any operational issues at that time. All parameters analyzed from the sample which generated the TNTC fecal coliform result were well within limits. There were no mechanical or process abnormalities that could have led to the elevated result.

On June 24, 2013, the plant recorded effluent chlorine residual of 0.1 mg/l and 0.3 mg/l and the sand filter chlorine concentration was 0.48 mg/l, all typical readings indicating normal operation of the disinfection/dechlorination system. The facility collected and analyzed four plant effluent samples for fecal coliform in July 2013, their results were 33, 1, 10 and 1 CFU.

Delhi WWTP. Has the cause for exceedances in settleable solids and CBOD in August 2013 been identified?

DEP Response:

DEP inspected the facility and found no mechanical or process abnormalities that could have led to the settleable solids exceedance. There has not been a settleable solids exceedance since.

The SPDES permit effluent limits for CBOD concentration monthly and 7-day average are 25 mg/l and 40 mg/l respectively. The FAD report erroneously listed the detection limit as 8.0 mg/l. There was not an exceedance for this parameter. DEP will ensure the appropriate limit is corrected for future FAD reports.