

**NEW YORK**  
*state department of*  
**HEALTH**

Howard A. Zucker, M.D., J.D.  
Acting Commissioner of Health

Sue Kelly  
Executive Deputy Commissioner

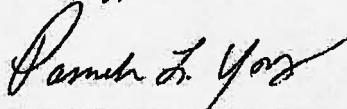
October 6, 2014

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, 2014. Our comments are attached. We would appreciate if you could provide a reply to these comments by November 7, 2014. 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: R. Sokol  
T. Boepple-Swider  
P. Sweeney – USEPA  
K. Kosinski – NYSDEC

## **DOH/EPA Comments on FAD Deliverables due August 31, 2014**

### **6.2 Wastewater Treatment Plant Compliance and Inspection Program**

Two reports, the Wastewater Treatment Plant Compliance Inspection Reports, Summary – 1<sup>st</sup> and 2<sup>nd</sup> 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.

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 NH<sub>3</sub> 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 NH<sub>3</sub> exceedances and the SBR malfunctions.
- 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.

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

- 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?