

Jacobs Comment Review Form (CRF)
Client/Project: Onondaga County CSO
Deliverable: 2020 LTCP Annual Report
Date: 10/20/2021

Comment No.	Comment By	Section	Page No.	Comment/Edit	Response to Comment
1	DEC	General	General	The CSO BMP Annual Report is a mandatory requirement of the SPDES permit. In future submissions, please ensure that the CSO BMP Annual Report is submitted as its own Report in accordance with the SPDES Permit CSO BMP #15. While utilizing the CSO BMP Annual Report as an attachment to an Order on Consent required Annual Report may be acceptable, the CSO BMP Annual Report must be submitted on its own item for permit compliance.	Acknowledged. The CSO BMP Annual Report will be submitted separately going forward.
2	DEC	ES	ES-1	Once the transition from the ACJ to the State Order is finalized, please refer to the Annual Report as an "Annual Plan Report" as the County has not yet submitted a revised Long Term Control Plan under the State Order. Nor has the draft LTCP been approved by NYSDEC. Until that time, please refer to any annual report submissions as the "Annual Report", basing the report on requirements governed by the ACJ. Please correct the summary to avoid confusion to the general reader.	Acknowledged. The title of the current report and summary have been revised.
3	DEC	ES	ES-3	SWMM uses hydraulic and hydrological computational methods to simulate urban watersheds. Given that no engineering or scientific model is exact, "estimate" rather than "calculate" volume capture is more appropriate terminology.	"Calculate" has been used historically by the County to refer to SWMM results and is commonly used by both US EPA and in the industry for calibrated SWMM models. "Individual storms related to monitored events can be run to calculate the total volume of overflow for the system." We revised the first sentence of the subject paragraph in the ES to read "The County's SWMM is a suitable tool used to calculate estimated CSO volume and frequency and to forecast the effectiveness of potential system improvements." and we left the use of "calculated" unchanged later in the paragraph.
4	DEC	1	1-2	The Department is unaware of written correspondence detailing an agreement to base content of the Annual Report on any portion of the unapproved draft LTCP. Please either provide the written agreement or delete reference to such an agreement.	Please refer to attached email dated April 21, 2020 from Tom Vigneault, which states that the NYSDEC approved the 2019 Annual Report outline based on the draft LTCP, which has been replicated in the 2020 Annual Report.
5	DEC	1	Figure 1-1	There are some discrepancies in the list of CSO outfalls between NYSDEC records and those provided in the 2020 Report for which we request clarification. Department records do not have Outfall 063A listed. The permit and Department records both have Outfall 065 noted as an active CSO, rather than closed in 1999 as stated in the CSO BMP Annual Report. Further, other outfalls are listed in Department records and the SPDES permit but are not listed in the 2020 CSO BMP Annual Report, including CSO outfalls 18A, 063, 073, and 074. Please clarify.	<p>Outfall 063 was relocated during 2015. In the 2015 Annual Report, the County began using the 63A designation for the new outfall to distinguish it from the former Outfall 063 location. In 2017, the County submitted a report to the NYSDEC that verified there were no sanitary sewer connections to Outfall 065. At that time the County requested that CSO 065 be removed from the permit. See attached documentation submitted to NYSDEC regarding Outfall 063 and Outfall 065. Based on this documentation, the County is anticipating that when the permit is reissued it will include Outfall 63A instead of 063 and Outfall 065 will be removed.</p> <p>Outfall 18A has been added to Table 1-2, Figure 1-1, and the CSO BMP Annual Report.</p> <p>Outfall 073 was inadvertently labeled 73A based on a drainage area label in the SWMM model. The report has been edited to replace the 73A designation with 073.</p> <p>Outfall 074 (Hiawatha RTF) is shown in Table 1-2, Figure 1-1, and in the similar table and figure provided in the CSO BMP Annual Report.</p>

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6	DEC	2	2-19	Please include units when specifying a reduction of 350,000 in the second paragraph. Preface this decrease with "approximately" or "estimated."	Acknowledged. The report has been edited as requested.
7	DEC	2	2-38	At what frequency does the County conduct GI inspections on private property? Please include this information in the Report.	The County inspects GI on private property once every 3-5 years. The report has been edited to include this information.
8	DEC	3	3-2	The I-81 project is not likely to be completed for many years. We recommend recalibrating the SWMM model now as a new baseline for the proposed County projects in the draft LTCP. This will reset the baseline conditions and allow an assessment of the future benefits of future County projects once those have been completed.	The County plans to recalibrate the model in accordance with the requirements of the future State Consent Order. The reference to recalibrating the model after the I-81 project has been removed from the report.
9	DEC	3	3-3	The second paragraph implies that the 1-year, 2-hour storm is separate from the 1991 typical year design storm. Please advise how the design storm in paragraph 2 differs from that described in paragraph 1. If there is no difference, please make the appropriate changes.	There is a 1991 Typical Year set of results which includes all the storms that occurred during the year of 1991. The 1-year, 2-hour Design Storm model results are only from a single storm event outside of the 1991 typical year. The text was edited to clarify this distinction.
10	DEC	4	Table 4-2	What is the unit of measurement for the CSO values? Please include either as a footnote or in the Table itself.	The table shows the units of measurement as gallons. To further clarify, the table was edited to add the word "Volume" after the word "Overflow" and "Total" before the word "Gallons" to the units.
11	DEC	4	4-5	Currently, the LTCP is in draft form and unapproved. Therefore, the statement of "meeting the obligations of the LTCP" is inaccurate. Please revise the text referencing the USEPA CSO Control Policy and/or the ACJ for the reported data and information covering 2020.	The text was edited to reference the USEPA CSO Control Policy and/or ACJ instead of the draft LTCP.
12	DEC	4	4-6	As noted above, the draft LTCP has not been approved by the NYSDEC. WQS monitoring should be in accordance with the AMP under the ACJ, as previously approved by the NYSDEC.	The text was edited as indicated in the comment.
13	DEC	Appendix A	Appendix F	In the Appendix F CSO Facility Performance Summary, Footnote 4 states "the CSO 018 Pilot Constructed Wetlands Treatment Facility provides partial treatment per the definition contained in the Federal CSO Control Policy." However, there is no definition for "partial treatment" in the CSO Control Policy. There is a definition for "minimum treatment", which includes screening, primary settling, and disinfection. Does the Wetland Facility provide disinfection? If not, then this facility does not provide "minimum treatment" in accordance with the CSO Control policy, and the footnote should be revised to advance clarity.	The footnote was edited to state that "the CSO 018 Pilot Constructed Wetlands Treatment Facility provides partial treatment equivalent to primary clarification. The facility does not provide disinfection and, therefore, it does not provide "minimum treatment" in accordance with the CSO Control policy."

Attachment A
Comment 4: Email Approving Outline for 2019
Annual Report

From: Vigneault, Thomas M (DEC) <thomas.vigneault@dec.ny.gov>
Sent: Tuesday, April 21, 2020 4:51 PM
To: Monge, Zachary/SYR <Zachary.Monge@jacobs.com>
Cc: Frank Mento <FrankMento@ongov.net>; Adam Woodburn <AdamWoodburn@ongov.net>; Marko, Matthew J (DEC) <matthew.marko@dec.ny.gov>; Parker, Reginald (DEC) <reginald.parker@dec.ny.gov>
Subject: Re: 2019 Annual Report

NOTICE: This email originated from outside of Onondaga County's email system. Use caution with links and attachments.

Hi Zach,

I still need to connect with Reggie on what was covered in today's meeting, but the outline you provided with the TOC for the 2019 Annual report is acceptable to the Department. Thanks for sharing it with us prior to submission.

Regards,
Tom

Thomas M. Vigneault, P.E.
Regional Water Engineer
NYSDEC Region 7, Division of Water
615 Erie Blvd West
Syracuse, New York 13204
(315) 426-7471 - Phone
(315) 426-7459 - Fax
thomas.vigneault@dec.ny.gov

2019 Annual Report due 6/1/2020	
Section #	Report Sections/Subsections
ES	Executive Summary
1	Introduction and Program Summary
1.1	2019 Annual Report
1.1.1	Combined Sewer System Overview
1.2	SPDES Permit Requirements
1.2.1	Combined Sewer Overflows Annual Report
1.2.2	Schedule of Compliance - CSOs
1.3	Annual Report Information and Certification
1.4	Annual Report Organization
2	CSO Control Project Status Update
2.1	2019 Projects Completed
2.1.1	Green Infrastructure Projects
2.1.2	Grey Infrastructure Projects
2.2	2019 Projects Under Construction
2.2.1	Green Infrastructure Projects
2.2.2	Grey Infrastructure Projects
2.3	Future Planned Projects
2.4	Maintenance Update
2.4.1	Green Infrastructure Maintenance
2.4.2	Gray Infrastructure Maintenance
3	SWMM Update
3.1	2019 Conditions Model Update
3.2	2019 Capture Results and Projections
4	CSO Monitoring Program
4.1	2019 LTCP Monitoring Program
4.1.1	Status of PCCM/RTM
4.1.2	Water Quality Monitoring Program
4.1.2.1	Compliance Status
4.1.3	CSO Monitoring Program
4.1.3.1	CSO Water Quality Monitoring Program
4.1.3.2	CSO Flow Monitoring Program
4.2	CSO Outfall SPDES Permit Sewer Separation Monitoring
4.3	2019 CSO BMP Report
4.4	Floatables Control Program Update
5	Public Outreach and Participation
5.1	2019 Public Outreach and Participation
6	Conclusions
	Appendices
A	2019 Combined Sewer Overflows Annual Report
B	2019 CSO Flow Monitoring Data for Representative CSOs
C	2019 WQ Monitoring Data (electronic only - Excel file on CD)

Attachment B
Comment 5: Letter to NYSDEC CSO 063 Status
10-7-15



Camp Dresser & McKee/C&S Engineers, Inc.

A J o i n t V e n t u r e

6800 Old Collamer Road, Suite 3, East Syracuse, New York 13057

Phone: 315/434-3200 - Fax: 315/463-0508

October 7, 2015

Mr. Timothy DiGuilio, P.E.
Regional Water Engineer
NYSDEC – Region 7
615 Erie Boulevard West
Syracuse, NY 13204-2400

Re: Lower Harbor Brook CSO 063 Conveyances

Dear Mr. DiGiulio:

We are providing this letter of declaration stating the CSO 063 Conveyances are operational and are available to convey CSO discharge from CSO #063 to the Lower Harbor Brook Storage Facility. The project will now allow the Lower Harbor Brook (LHB) Storage Facility to accept flow as designed from three large CSO areas (003, 004 and 063) encompassing over 830 acres within the Harbor Brook service area. These three CSO basins represent nearly half of the combined sewer area in the Harbor Brook drainage basin. In addition, the County cleaned, rehabilitated, replaced and/or installed oil and debris catch basin hoods on over 70 catch basins within the CSO 063 basin which will greatly improve catch basin efficiency during storm events and limit floatables from entering the combined sewers.

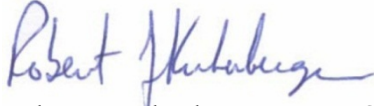
On August 6th, 2015 the LHB Storage Facility began accepting CSO flow from the 063 basin via the new 60-inch Emerson Truck Sewer extension from Emerson Avenue to Erie Blvd. West, and the 48- and 60-inch CSO conveyance sewers located in Erie Blvd. West and along Harbor Brook. By August 20th, 2015 the new CSO 063 outfall was fully operational with the installation of the stainless steel stop logs to the proper weir height. The contractor completed the final restoration of all surfaces and the installation of the new slide gates in the grit chamber in Erie Blvd. West on September 11, 2015. The project included the installation of the following major components:

- 575 LF of 60-inch diameter sewer from Emerson Ave. to Erie Blvd. West
- New CSO 063 regulator manhole and grit chamber in Erie Blvd. West
- 1600 LF of 48 and 60-inch diameter CSO conveyance pipeline from Erie Blvd. West to Harbor Brook
- New CSO 063 diversion manhole and outfall to Harbor Brook
- 715 LF of 48-inch diameter CSO conveyance sewer from the 063 outfall to Hiawatha Blvd.
- The cleaning of 73 catch basins, 46 rehabilitations, 7 replacements and installation of 73 oil and debris catch basin hoods

CDM/C&S, as the Engineer of Record for the project observed construction and testing of the conveyance pipelines, manholes and appurtenances, in accordance with the Contract Documents. The Certificate of Beneficial Occupancy for the project is attached to this letter for your records. We will be reviewing the record drawings and other project closeout documentation associated with the Certificate of Substantial Completion for project closeout. The record drawings and certificate of project completion will be forwarded to your office after the certificate of substantial completion has been executed.

In consideration of our observation of construction activities, the availability of the conveyance pipeline to convey flow from CSO #063 to the Storage Facility, and the execution of the certificate of beneficial occupancy; the County has met the major milestone of October 1, 2015.

Sincerely,
CDM/C&S Engineers, A Joint Venture



Robert J. Kukenberger, P.E. BCEE
Project Manager



cc: Tom Rhoads, Commissioner, OCDWEP
Samuel Sage, ASLF
Kenneth Lynch, NYSDEC - Region 7
Mark Klotz, NYSDEC - Albany
Scott Crisafulli, NYSDEC - Albany
Dare Adelugba, NYSDEC - Albany
Valarie Ellis, NYSDEC - Region 7
Dan Hayes, NYSDEC - Region 7
Debra Banks, NYSDEC - Region 7
Kathleen McGrath, NYSDEC/CNYRPB
Dan Hayes, NYSDEC Region 7
Norman Spiegel, NYS Office of Attorney General
John Davis, NYS Office of Attorney General
Mary Beth Primo, Onondaga County Executive Office
Travis Glazier, Onondaga County Office of the Environment
Lori Tarolli, Onondaga County Law Department
Luis Mendez, Onondaga County Law Department
Liz Ricci, NYSEFC
Jimmy Ng, NYSEFC
Mike Lannon, OCDWEP
Nick Capozza, OCDWEP
Jeanne Powers, OCDWEP
Janaki Suryadevara, OCDWEP
Madison Quinn, OCDWEP
Hongbin Gao, ASLF
Olivia Green, ASLF
Chuck Dworkin, Nolan and Heller
Douglas McKenna, USEPA - Region II
Seth Ausubel, USEPA - Region II
Christopher Dere, USEPA - Region II
Michael Shaw, USEPA - Region II
Lauren Fischer, USEPA - Region II
Larry Gaugler, USEPA - Region II
Robert Palladine, C&S
Matt Marko, CH2MHILL
Eric Schultheis, OCDWEP
Chris Schmidt, CDM/C&S

Attachment: Certificate of Beneficial Occupancy



Joanne M. Mahoney, County Executive
Tom Rhoads, P.E., Commissioner
650 Hiawatha Boulevard West
Syracuse, NY 13204-1194
Phone (315) 435-2260 or (315) 435-6820
FAX (315) 435-5023
<http://www.ongov.net/wep/>

September 21, 2015

Mr. Steve Garrett
Marcellus Construction, Inc.
11151 US Route 11
Adams, NY 13605

Re: **Onondaga County Department of Water Environment Protection
Harbor Brook CSO 063 Conveyances Project
Project #987959; CT # 18014; Contract 5 – General**

Dear Steve,

Pursuant to Section G-6.07.B of the Contract Documents, you are hereby notified that the following described work of your contract is accepted for Beneficial Occupancy:

Description of Work: The project generally consisted of construction of approximately 2,000 linear feet of 60-inch diameter pipeline, 1,000 linear feet of pile supported 48-inch diameter pipeline, 150 linear feet of 48-inch diameter pipe jacking underneath the New York, Susquehanna & Western Railway, new 36-inch diameter CSO 063 outfall pipe to Harbor Brook with pile supported headwall structure, new CSO 063 regulator structure, a new grit chamber structure, and manholes. The work also included the cleaning of 73 catch basins, 46 rehabilitations, 7 replacements and installation of 73 oil and debris catch basin hoods in the west side neighborhood of the City of Syracuse.

Date of Beneficial Occupancy: September 11, 2015
Beginning of Guarantee Period for Described Work: September 11, 2015
End of Guarantee Period for Described Work: September 11, 2016

Beneficial Occupancy of the above described work shall not relieve the Contractor from completing all of the contract work in accordance with the Contract Documents, or from other contractual obligations, and shall not prejudice the owner in any way.

Owner's Representative Signature: 
Paul McInerney (Construction Superintendent)

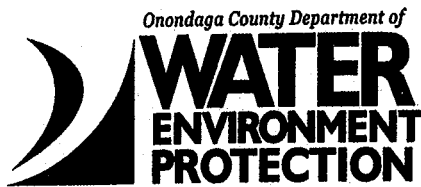
Recommended by:  9/30/15
CDM/C&S (Design Engineer) (Date)

Accepted by:  10/1/15
Marcellus Construction Inc. (Contractor) (Date)

Acknowledged by:  10/1/15
Tom Rhoads (Commissioner) (Date)

Cc: Tom Rhoads, P.E., OCDWEP
Nick Capozza, OCDWEP
Eric Schultheis, OCDWEP
Paul McInerney, OCDWEP
Tom Tokaryk, OCDWEP
Bob Kukenberger, P.E., CDM/C&S
Chris Schmidt, CDM/C&S
Bob Palladine, P.E., CDM/C&S
File

Attachment C
Comment 5: Letter to NYSDEC CSO 065 Removal
3-6-17



Joanne M. Mahoney, County Executive
Tom Rhoads, P.E., Commissioner
Flow Control Division
7120 Henry Clay Boulevard
Liverpool, NY 13088-5344
(315) 435-5402
FAX (315) 435-5458
<http://www.ongov.net/wep/>

March 6, 2017

Timothy DiGiulio, P.E.
Regional Water Engineer
New York State Department of Environmental Conservation
615 Erie Boulevard West
Syracuse, New York 13204

Re: Metropolitan Syracuse WWTP SPDES Permit – Removal of CSO 065

Dear Mr. DiGiulio:

Enclosed is a technical memorandum prepared by Arcadis regarding the current status of CSO 065. Based on field investigations, including CCTV inspection, the existing sanitary sewer has no connection to CSO 065.

We request that the Metropolitan Syracuse WWTP SPDES Permit be revised to remove CSO 065, based on findings summarized in the technical memorandum.

If you have any questions or require additional information, please contact me at (315) 435-5402 x 204.

Sincerely,

ONONDAGA COUNTY DEPARTMENT OF
WATER ENVIRONMENT PROTECTION



Nicholas A. Capozza
Sewer Maintenance Engineer

NAC/es

Enclosure

Copy to: Daniel Hayes, NYSDEC
Tom Rhoads, P.E., OCDWEP