

Appendix A

Final SPDES Permit No. NY 002 7081 for Metro

March 21, 2012

New York State Department of Environmental Conservation

Division of Environmental Permits, Region 7

615 Erie Boulevard West, Syracuse, New York 13204-2400

Phone: (315) 426-7438 • Fax: (315) 426-7425

Website: www.dec.ny.gov

WATER ENVIRONMENT
PROTECTION

2012 MAR 23 PM 3:04

RECEIVED
ONONDAGA COUNTY



Joe Martens
Commissioner

March 21, 2012

Tom Rhoads

Onondaga County Dept of Water Environment Protection

650 Hiawatha Boulevard West

Syracuse, NY 13204-1194

RE: Final State Pollutant Discharge Elimination System Permit (SPDES) No. NY 002 7081
DEC ID#: 7-3115-00113/00001
Facility: The Metropolitan Syracuse Wastewater Treatment Plant, 650 Hiawatha Blvd. West,
Syracuse, Onondaga County

Dear Mr. Rhoads:

Enclosed please find your State Pollutant Discharge Elimination System (SPDES) permit. It is effective beginning March 21, 2012, and expires on March 20, 2017.

During the public comment period, comments were received from the public and from the USEPA. These comments, and the Department's responses, are included in the attached responsiveness summary.

Please read all permit conditions carefully. All permit documents must be available upon request by the Department staff and must be distributed to and understood by personnel responsible for the proper operation of the facility and compliance with the discharge limits. Any violation of these permit conditions constitutes a violation of the Environmental Conservation Law.

The Department maintains authority regarding the terms of this permit in accordance with 6 NYCRR 750. This regulation may be accessed from the internet at the Department's website, <http://www.dec.ny.gov/regs/4584.html>. If you do not have website access, you may obtain a paper copy of the regulation at the address or phone number above.

If you have any other questions regarding this permit, you may contact the Division of Environmental Permits at the above address. Please refer to the above referenced numbers when you are corresponding with this office or when you are applying to renew or modify this permit.

Any questions regarding the annual pollutant discharge elimination fee should be addressed directly to the Regulatory Fee Determination Unit at 1-800-225-2566.

If there are any questions, please contact this office. Thank you.

Sincerely,



Elizabeth A. Tracy
Deputy Regional Permit Administrator

cc: Mary Jane Peachey
Joe Zalewsky
Valarie Stephenson
Dare Adelugba
Daniel Jean, OCD WEP
Jeff Till, Onondaga Co Health Dept.
Matt Millea, County Executive
EPA, Region II Water
File



NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION
State Pollutant Discharge Elimination System (SPDES)
DISCHARGE PERMIT

Industrial Code: **4952**
 Discharge Class (CL): **05**
 Toxic Class (TX): **T**
 Major Drainage Basin: **07**
 Sub Drainage Basin: **02**
 Water Index Number: **P154**
 Compact Area: **IJC**

SPDES Number: **NY 002 7081**
 DEC Number: **7-3115-00113/00001**
 Effective Date (EDP): **March 21, 2012**
 Expiration Date (ExDP): **March 20, 2017**
 Modification Dates:
 Attachment(s): **Appendix A**

This SPDES permit is issued in compliance with Title 8 of Article 17 of the Environmental Conservation Law of New York State and in compliance with the Clean Water Act, as amended, (33 U.S.C. §1251 et. seq.) (hereinafter referred to as "the Act").

PERMITTEE NAME AND ADDRESS

Name: **Onondaga County Dept of Water Environment Protection** Attention: **Tom Rhoads, PE, Commissioner**
 Street: **650 Hiawatha Boulevard West**
 City: **Syracuse** State: **NY** Zip Code: **13204-1194**

is authorized to discharge from the facility described below:

FACILITY NAME AND ADDRESS

Name: **The Metropolitan Syracuse Wastewater Treatment Plant**
 Location (C,T,V): **Syracuse** County: **Onondaga**
 Facility Address: **650 Hiawatha Boulevard West**
 City: **Syracuse** State: **NY** Zip Code: **13204-1194**
 NYTM -E: NYTM - N:
 From Outfall No.: **001** at Latitude: **43 ° 04 ' 04 "** & Longitude: **76 ° 11 ' 07 "**
 into receiving waters known as: **Onondaga Lake** Class: **C**

and; (list other Outfalls, Receiving Waters & Water Classifications)
See outfalls listing on pages 3 through 6 of this permit.

in accordance with the effluent limitations, monitoring requirements and other conditions set forth in 6 NYCRR 750-1.2(a) and 750-2.

DISCHARGE MONITORING REPORT (DMR) MAILING ADDRESS

Mailing Name: **Onondaga County Department of Water Environment Protection - Syracuse Metro**
 Street: **650 Hiawatha Boulevard West**
 City: **Syracuse** State: **NY** Zip Code: **13204-1194**
 Responsible Official or Agent: **Mr. Daniel Jean, WWTP Superintendent** Phone: **(315) 435-2260, ext 309**

This permit and the authorization to discharge shall expire on midnight of the expiration date shown above and the permittee shall not discharge after the expiration date unless this permit has been renewed, or extended pursuant to law. To be authorized to discharge beyond the expiration date, the permittee shall apply for permit renewal not less than 180 days prior to the expiration date shown above.

DISTRIBUTION:

Bureau of Water Permits (3505)
 DOW - R7
 USEPA Region II
 OCHD
 Mayor, C-Syracuse

Deputy Regional Permit Administrator: Elizabeth Tracy	
Address: NYS Department of Environmental Conservation 615 Erie Blvd. West Syracuse, NY 13204-2400	
Signature: <i>Elizabeth Tracy</i>	Date: 3/21/2012

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I. ADDITIONAL OUTFALLS

Table I.1: Plant Bypass

Outfall No.	Description	Latitude/Longitude	Receiving Water
002	Secondary Treatment Bypass	43° 03' 54" N/76° 10' 51" W	Onondaga Lake
001A	Tertiary System Bypass		Onondaga Lake via Outfall 001

Table I.2: Combined Sewer Outfalls (See additional requirements in Sections VII & VIII)

003	Hiawatha Boulevard (North of State Fair Blvd.)	43° 03' 20" N/76° 11' 07" W	Harbor Brook
004	State Fair Blvd.	43° 03' 13" N/76° 10' 54" W	Harbor Brook
005	West Genesee and Sackett Street	43° 03' 11" N/76° 10' 38" W	Harbor Brook
006	Park Avenue and Sackett St. Overflow (West of Harbor Brook)	43° 03' 07" N/76° 10' 35" W	Harbor Brook
006A	Park Avenue and Sackett St. Overflow (East of Harbor Brook)	43° 03' 07" N/76° 10' 35" W	Harbor Brook
007	Richmond Avenue and Liberty Street	43° 03' 00" N/76° 10' 26" W	Harbor Brook
008	Lakeview Avenue and Liberty Street	43° 02' 57" N/76° 10' 29" W	Harbor Brook
009	West Fayette Street (West of Harbor Brook)	43° 02' 47" N/76° 10' 33" W	Harbor Brook
010	West Fayette Street (East of Harbor Brook)	43° 02' 45" N/76° 10' 21" W	Harbor Brook
011	Gifford Street (East of Harbor Brook)	43° 02' 34" N/76° 10' 23" W	Harbor Brook
013	Seymour Street	43° 02' 30" N/76° 10' 28" W	Harbor Brook
014	Delaware Street	43° 02' 24" N/76° 10' 29" W	Harbor Brook
015	Herriman Street and Grand Avenue	43° 02' 20" N/76° 10' 38" W	Harbor Brook
016	Lydell Street	43° 02' 16" N/76° 10' 43" W	Harbor Brook
017	Hoeffler Street	43° 02' 12" N/76° 10' 47" W	Harbor Brook
018	Rowland Street	43° 02' 07" N/76° 11' 05" W	Harbor Brook
020	Butternut Floatables Control Facility Route 690	43° 03' 17" N/76° 09' 26" W	Onondaga Creek
021	Burnet Floatables Control Facility Route 690 and Burnet	43° 03' 16" N/76° 09' 25" W	Onondaga Creek

Outfall No.	Description	Latitude/Longitude	Receiving Water
027	W. Fayette Street (Eastside of Onondaga Creek)	43° 02' 55" N/76° 09' 28" W	Onondaga Creek
028	Walton Street (Westside of Onondaga Creek)	43° 02' 53" N/76° 09' 27" W	Onondaga Creek
029	Walton Street (Eastside of Onondaga Creek)	43° 02' 53" N/76° 09' 27" W	Onondaga Creek
030	W. Jefferson Street (Eastside of Onondaga Creek)	43° 02' 50" N/76° 09' 27" W	Onondaga Creek
031	W. Jefferson Street (Westside of Onondaga Creek)	43° 02' 49" N/76° 09' 28" W	Onondaga Creek
032	Tully Street	43° 02' 45" N/76° 09' 28" W	Onondaga Creek
033	Dickerson Street	43° 02' 40" N/76° 09' 19" W	Onondaga Creek
034	Clinton & West Onondaga Street	43° 02' 37" N/76° 09' 17" W	Onondaga Creek
035	Gifford Street	43° 02' 37" N/76° 09' 17" W	Onondaga Creek
036	West Onondaga Street	43° 02' 33" N/76° 09' 18" W	Onondaga Creek
039	Tallman Street (East of Onondaga Creek)	43° 02' 12" N/76° 09' 19" W	Onondaga Creek
037	Adams & Oneida Street	43° 02' 32" N/76° 09' 18" W	Onondaga Creek
042	Midland Street (Westside of Onondaga Creek)	43° 01' 59" N/76° 09' 29" W	Onondaga Creek
044	West Castle Street and South Avenue	43° 01' 50" N/76° 09' 34" W	Onondaga Creek
052	Hunt Street & Elmhurst Avenue	43° 01' 15" N/76° 09' 21" W	Onondaga Creek
060/077	West Colvin Street	43° 01' 25" N/76° 09' 17" W	Onondaga Creek
063	Emerson & Milton Avenue	43° 03' 35" N/76° 11' 33" W	Harbor Brook
065	Plum and Evans Streets	43° 03' 20" N/76° 09' 37" W	Onondaga Creek
066	Maltbie and Evans Street Maltbie Floatables Control Facility	43° 03' 20" N/76° 09' 41" W	Onondaga Creek
067	Newell Street	43° 00' 58" N/76° 09' 28" W	Onondaga Creek
071	Spencer Street Bypass	43° 03' 26" N/76° 09' 41" W	Onondaga Creek
073	Teall and Mildred Avenues Teall Floatables Control Facility	43° 04' 42" N/76° 07' 25" W	Teall Brook
074	Spring Street & Hiawatha Blvd. Hiawatha Regional Treatment Facility	43° 04' 36" N/76° 10' 19" W	Ley Creek

Outfall No.	Description	Latitude/Longitude	Receiving Water
075	Route 81 & Hiawatha Blvd. (Associated with Kirk Patrick PS)	43° 03' 54" N/76° 10' 25" W	Onondaga Creek
076	Midland Avenue and Brighton Avenue	43° 01' 09" N/76° 09' 18" W	Onondaga Creek
078	Bellevue Avenue & Velasko Road	43° 02' 08" N/76° 11' 19" W	Harbor Brook
079	Park Avenue & Lakeview Avenue	43° 03' 08" N/76° 10' 36" W	Onondaga Creek
080	Erie Blvd Storage System & Onondaga Creek	43° 03' 03" N/76° 09' 30" W	Onondaga Creek
A - B - C - D - E - F - G - H - I -	James Street Relief Sewer Fayette Street & Irving Avenue S. Crouse Avenue & Washington Burnet Ave & Elm Street E. Washington & Pine Street S. Beech & Canal Street Burnet & Sherwood Burnet & Teall Genesee & Westcott Street		EBSS EBSS EBSS EBSS EBSS EBSS EBSS EBSS EBSS
M01	Main CSO Outfall at Midland RTF	43° 02' 00"N/76° 09' 30"W	Onondaga Creek
M02	Emergency CSO Outfall at Midland RTF	43° 02' 01"N/76° 09' 30"W	Onondaga Creek

Table I.3: The following list of overflows is tributary to separate sanitary sewers. Discharges from these overflows shall be reported to the NYSDEC Region 7 Water Engineer within 24 hours of occurrence:

Outfall No.	Description	Latitude/Longitude	Receiving Water
068	Westside Pump Station	43° 04' 10" N/76° 04' 10" W	Onondaga Lake
069	Hillcrest Pump Station	43° 02' 11" N/76° 11' 38" W	Harbor Brook
070	Brookside Pump Station	43° 02' 10" N/76° 11' 38" W	Harbor Brook
084	Ley Creek Pump Station	43° 05' 21" N/76° 09' 37" W	Ley Creek
085	Liverpool Pump Station	43° 05' 52" N/76° 12' 04" W	Bloody Brook
086	Town of Salina- Manhole @ Toas Ave. and Young Ave.	N 43° 05.56/W 076° 08.59'	Ley Creek
087	Town of Salina- Manhole @ Garden City Drive	N 43° 05.27/W 07° W 09.74'	Ley Creek
088	OCDWEP- Westside Trunk Sewer Manhole@ Bronson Road	N 42° 02.80/W 076° 13.11'	Geddes Brook
089	OCDWEP - Westside Trunk Sewer/Crucible	N 43° 04.30/W 076° 12.28'	Tributary 5A

Outfall No.	Description	Latitude/Longitude	Receiving Water
090	OCDWEP - Floradale Road Manhole	N 43° 06.15/W 076° 11.88'	West Branch of Bloody Brook
091	OCDWEP - Ley Creek Pump Station	N 43° 05.27/W 076° 09.74'	Ley Creek
092	OCDWEP - Viking Place Manhole	N 43° 05.99/W 076° 11.61'	East Branch of Bloody Brook
093	OCDWEP - Electronics Park Trunk Sewer Manhole	N 43° 05.91/W 076° 11.49'	East Branch of Bloody Brook

Table I.4

The following list of CSO outfalls are scheduled for sewer separation in projects required by the Amended Consent Judgment (ACJ). The ACJ is a federal court-ordered judgment signed by Onondaga County, Atlantic States Legal Foundation, and NYSDEC in January 1998 and modified in May 1998, December 2006, April 2008 and November 2009. Permittee must inform the Department annually of any changes to the outfalls listed below and must also report annually results of all inspections and results. Upon inspection and confirmation by NYSDEC that these outfalls have been permanently sealed or eliminated, this table will be deleted from the permit. Beginning from the date of separation, permittee shall monitor outfalls for a period of no less than 3 years, minimum 4 samples per location per year, during storm events to confirm the effectiveness of the sewer separation. If evidence of sewage is discovered, the County must report to the NYSDEC Regional Water Engineer within two days after first noticing the overflow or discharge. The report must include a schedule for corrective actions. In lieu of sampling, the Department will consider an alternate method of determining sewer separation effectiveness provided the County has provided a complete written request and justification and the Department has provided written approval. Until the Department approval has been received by the County, sampling must be completed as required in this permit.

Outfall No.	Description	Latitude/Longitude	Receiving Water
022	Wallace & West Genesee Street	43° 03' 11" N/76° 09' 29" W	Onondaga Creek
045	West Castle Street and Hudson Street	43° 01' 49" N/76° 09' 38" W	Onondaga Creek
061	Crechange Street & Onondaga Creek Overflow	43° 01' 19" N/76° 09' 18" W	Onondaga Creek

II. PERMIT LIMITS, LEVELS AND MONITORING DEFINITIONS

OUTFALL	WASTEWATER TYPE	RECEIVING WATER	EFFECTIVE	EXPIRING		
	This cell describes the type of wastewater authorized for discharge. Examples include process or sanitary wastewater, storm water, non-contact cooling water.	This cell lists classified waters of the state to which the listed outfall discharges.	The date this page starts in effect. (e.g. EDP or EDP)	The date this page is no longer in effect. (e.g. ExDP)		
PARAMETER	MINIMUM	MAXIMUM	UNITS	SAMPLE FREQ.	SAMPLE TYPE	
e.g. pH, TRC, Temperature, D.O.	The minimum level that must be maintained at all instants in time.	The maximum level that may not be exceeded at any instant in time.	SU, °F, mg/l, etc.			
PARAMETER	EFFLUENT LIMIT	PRACTICAL QUANTITATION LIMIT (PQL)	ACTION LEVEL	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE
	Limit types are defined below in Note 1. The effluent limit is developed based on the more stringent of technology-based limits, required under the Clean Water Act, or New York State water quality standards. The limit has been derived based on existing assumptions and rules. These assumptions include receiving water hardness, pH and temperature; rates of this and other discharges to the receiving stream; etc. If assumptions or rules change the limit may, after due process and modification of this permit, change.	For the purposes of compliance assessment, the analytical method specified in the permit shall be used to monitor the amount of the pollutant in the outfall to this level, provided that the laboratory analyst has complied with the specified quality assurance/quality control procedures in the relevant method. Monitoring results that are lower than this level must be reported, but shall not be used to determine compliance with the calculated limit. This PQL can be neither lowered nor raised without a modification of this permit.	Type I or Type II Action Levels are monitoring requirements, as defined below in Note 2, that trigger additional monitoring and permit review when exceeded.	This can include units of flow, pH, mass, Temperature, concentration. Examples include µg/l, lbs/d, etc.	Examples include Daily, 3/week, weekly, 2/month, monthly, quarterly, 2/yr and yearly.	Examples include grab, 24 hour composite and 3 grab samples collected over a 6 hour period.

Note 1: DAILY DISCHARGE: The discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for the purposes of sampling. For pollutants expressed in units of mass, the „daily discharge is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurement, the daily discharge is calculated as the average measurement of the pollutant over the day.

DAILY MAX.: The highest allowable daily discharge. **DAILY MIN.:** The lowest allowable daily discharge.

DAILY AVG or 30-DAY ARITHMETIC MEAN (30-day average): The highest allowable average of daily discharges over a calendar month, calculated as the sum of each of the daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

7-DAY ARITHMETIC MEAN (7 day average): The highest allowable average of daily discharges over a calendar week.

30-DAY GEOMETRIC MEAN: The highest allowable geometric mean of daily discharges over a calendar month, calculated as the antilog of : the sum of the log of each of the daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

7-DAY GEOMETRIC MEAN: The highest allowable geometric mean of daily discharges over a calendar week.

RANGE: The minimum and maximum instantaneous measurements for the reporting period must remain between the two values shown.

Note 2: ACTION LEVELS: Routine Action Level monitoring results, if not provided for on the Discharge Monitoring Report (DMR) form, shall be appended to the DMR for the period during which the sampling was conducted. If the additional monitoring requirement is triggered as noted below, the permittee shall undertake a short-term, high-intensity monitoring program for the parameter(s). Samples identical to those required for routine monitoring purposes shall be taken on each of at least three consecutive operating and discharging days and analyzed. Results shall be expressed in terms of both concentration and mass, and shall be submitted no later than the end of the third month following the month when the additional monitoring requirement was triggered. Results may be appended to the DMR or transmitted under separate cover to the same address. If levels higher than the Action Levels are confirmed, the permit may be reopened by the Department for consideration of revised Action Levels or effluent limits. The permittee is not authorized to discharge any of the listed parameters at levels which may cause or contribute to a violation of water quality standards. **TYPE I:** The additional monitoring requirement is triggered upon receipt by the permittee of any monitoring results in excess of the stated Action Level. **TYPE II:** The additional monitoring requirement is triggered upon receipt by the permittee of any monitoring results that show the stated action level exceeded for four of six consecutive samples, or for two of six consecutive samples by 20 % or more, or for any one sample by 50 % or more.

III. PERMIT LIMITS, LEVELS AND MONITORING - MUNICIPAL

OUTFALL No.	LIMITATIONS APPLY:	RECEIVING WATER	EFFECTIVE	EXPIRING						
001	<input checked="" type="checkbox"/> All Year <input type="checkbox"/> Seasonal from _____ to _____	Onondaga Lake	March 21, 2012	March 20, 2017						
PARAMETER	EFFLUENT LIMIT					MONITORING REQUIREMENTS				FN
	Type	Limit	Units	Limit	Units	Sample Frequency	Sample Type	Location		
								Inf.	Eff.	
Flow (3)	12-month rolling average	84.2	MGD			Continuous	N/A	X	X	2, 4
CBOD ₅	30-day arithmetic mean	21	mg/l	14747	lbs/day	1/day	24-hour composite	X	X	1
CBOD ₅	7-day arithmetic mean	31.5	mg/l	22120	lbs/day	1/day	24-hour composite	X	X	
Solids, Suspended	30-day arithmetic mean	30	mg/l	21067	lbs/day	1/day	24-hour composite	X	X	1
Solids, Suspended	7-day arithmetic mean	45	mg/l	31600	lbs/day	1/day	24-hour composite	X	X	
Solids, Settleable	Daily Maximum	0.3	ml/l			6/day	Grab	X	X	
pH	Range	6.0 - 9.0	SU			6/day	Grab	X	X	
Nitrogen, Ammonia (as NH ₃), 6/1 - 10/31	30-day arithmetic mean	1.2	mg/l			1/day	24-hour composite	X	X	
Nitrogen, Ammonia (as NH ₃), 11/1 - 5/31	30-day arithmetic mean	2.4	mg/l			1/day	24-hour composite	X	X	
Nitrate (as N)	30-day arithmetic mean	Monitor	mg/l			1/week	24-hour composite		X	
Nitrite (as N)	30-day arithmetic mean	Monitor	mg/l			1/week	24-hour composite		X	
Nitrogen, TKN (as N)	30-day arithmetic mean	Monitor	mg/l			1/week	24-hour composite	X	X	
Phosphorus, Total (as P)	30-day arithmetic mean	Monitor	mg/l			1/day	24-hour composite	X	X	
Phosphorus, Total (as P)	12-month rolling average	0.02	mg/l			1/month	Calculated		X	5
Mercury, Total Recoverable	Daily Average	50	ng/l			1/month	24-hour composite		X	6, 8
Cyanide, Total	Daily Maximum			7.3	lbs/day	1/month	Grab		X	
Phenols, Total	Daily Average			9.7	lbs/day	1/month	Composite		X	6, 9, 10
Temperature	Daily Maximum	Monitor	°C			6/day	Grab		X	
Effluent Disinfection required: <input type="checkbox"/> All year <input checked="" type="checkbox"/> Seasonal from <u>April 1</u> to <u>October 15</u>										

Coliform, Fecal	30-day geometric mean	200	No./100 ml		1/day	Grab		X	
Coliform, Fecal	7-day geometric mean	400	No./100 ml		1/day	Grab		X	

PARAMETER	MONITORING ACTION LEVEL TYPE II	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Chromium, Total Recoverable	16	lbs/day	1/month	24-hr composite	
Nickel, Total Recoverable	28	lbs/day	4/year	24-hr composite	
Copper, Total Recoverable	17.6	lbs/day	1/month	24-hr composite	
Zinc, Total Recoverable	33	lbs/day	1/month	24-hr composite	
Tetrachloroethene	1.1	lbs/day	1/month	Grab	7
Cadmium, Total Recoverable	3.1	lbs/day	1/month	24-hr composite	
Iron, Total Recoverable	5260	lbs/day	1/month	24-hr composite	10
Lead, Total Recoverable	3	lbs/day	1/month	24-hr composite	
Chloroform	0.91	lbs/day	4/year	24-hr composite	7
Methylene Chloride	0.86	lbs/day	4/year	Grab	7
Butyl Benzyl Phthalate	3	lbs/day	4/year	Composite	6

ADDITIONAL MONITORING REQUIREMENTS

The following pollutants have been reported by previous sampling to be present in the permittee's influent or have been requested by the permittee to be included in these monitoring requirements. Due to the potentially harmful impact on the treatment facility operation and receiving water quality, the permittee shall comply with the monitoring requirements listed below.

Monitoring results, if not provided for on the Discharge Monitoring Report (DMR) form, shall be appended to the DMR for the period during which the sampling was conducted. The permittee is not authorized to discharge any of the listed parameters at levels which may cause or contribute to a violation of water quality standards. During the permit term, the discharges from the permittee shall be monitored as follows:

PARAMETER	COMPLIANCE LIMIT Daily Avg.	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
All 601 and 602 group substances	Monitor	lbs/day	2/year	Grab	7
Xylene	Monitor	lbs/day	2/year	Grab	7
Bis(2-ethylhexyl)phthalate	Monitor	lbs/day	2/year	Composite	6, 7
Dibutylphthalate	Monitor	lbs/day	2/year	Composite	6, 7
Silver, Total Recoverable	Monitor	lbs/day	2/year	24-hr composite	7
Arsenic, Total Recoverable	Monitor	lbs/day	2/year	24-hr composite	7

FOOTNOTES:

1. Effluent shall not exceed 15 % and 15 % of influent values for CBOD₅ & TSS, respectively. Percent removal requirements do not apply when influent flows are > 126.3 MGD.
2. The 12-month rolling average shall be the average of the monthly average of the current month plus the monthly averages of the eleven previous months.
3. Outfall 001 shall be used exclusively for all discharges up to 126.3 MGD from the facility.
4. Only effluent flows up to 126.3 MGD shall be disinfected using UV and shall be used in the calculation for the monthly average flow for outfall 001. Flows from 126.3 up to 240 MGD shall receive primary treatment and will be discharged via outfall 002 with chlorination/dechlorination capacity. All influent flows greater than 240 MGD will be disinfected prior to being discharged via outfall 001. Disinfection will be performed on all flows between April 1 and October 15.

5. The limits are as follows:

EFFECTIVE DATES	PHOSPHORUS ^(5a)
May 1, 2004 to March 31, 2006	Interim limit = 400 lbs/day 12-month rolling average
April 1, 2006 to November 15, 2010	Interim limit = 0.12 mg/l 12-month rolling average
November 16, 2010 to December 31, 2015	Interim limit = 0.10 mg/l 12-month rolling average
After December 31, 2015	Final limit = 0.02 mg/l 12-month rolling average or as required by the revised ACJ

5a. The 12-month rolling average shall be calculated using the current and previous 11 month's values. Final limit determination will be based on lake/watershed models and subsequent TMDL analysis and allocation process.

6. The composite shall be of 3 grab samples taken at eight (8)-hour intervals.
7. Sampling shall be implemented when plant flows represent typical industrial loadings.
8. The Interim Limit is 68 ng/l based upon existing effluent quality. The calculated Water Quality Based Effluent Limit for Mercury is 0.7 ng/l based on the Water Quality Evaluation for this discharge. However, available information indicates 0.7 ng/l is not achievable by this or any other POTW. The enforceable limit of 50 ng/l shall apply, consistent with TOGS 1.3.10, and is effective two years after the effective date of the permit modification. All samples shall be analyzed using EPA method 1631.
9. A Method Detection Limit (MDL) Program shall be undertaken by the permittee. The method detection limit is defined as the minimum concentration of a substance that can be identified, measured and reported with 99% confidence that the analyte concentration is greater than zero and is determined from replicate analyses (minimum of seven aliquots of matrix) of a sample of a given matrix containing analyte. The permittee shall use the following detectors: Pesticides, GC/Electron Capture, Pentachlorophenol, and GC/Mass Spectroscopy

Sampling shall be implemented when plant influent flows represent typical industrial loadings. Results are to be submitted to NYSDEC no later than 12 months after the effective date of the permit. The modified effluent limits will be revised once the MDL study is approved.

10. Within six months of EDP, the permittee shall submit an approvable toxicity testing, source trackdown and ambient monitoring plan. The plan shall be in narrative form, and shall include necessary plot plans, drawings and maps. The source trackdown shall include identification, evaluation, prioritization and control strategy to reduce the discharge of phenol and iron. The final report noted on page 23 of 29 is to include all ambient monitoring and toxicity testing data, as well as WWTP influent and effluent loadings, list of known or potential sources for iron and phenol and all control measures recommended to be implemented to achieve the WQBEL of 1.4 lbs/day for phenol and control measures to be implemented for iron.

PERMIT LIMITS AND MONITORING - MUNICIPAL

OUTFALL No.	LIMITATIONS APPLY:	RECEIVING WATER	EFFECTIVE	EXPIRING
002	[X] All Year [] Seasonal from _____ to _____	Onondaga Lake	March 21, 2012	March 20, 2017

PARAMETER	EFFLUENT LIMIT ^{(1), (9)}			MONITORING REQUIREMENTS				FN
	Type	Limit	Units	Sample Frequency	Sample Type	Location		
						Inf.	Eff.	
Flow (1)	Monthly Total	Monitor	MG	Continuous	Recorder/Totalizer		X	(2)
BOD ₅	Monthly Average	Monitor	mg/l	1/4 hrs	Composite		X	(5)
Solids, Suspended	Monthly Average	Monitor	mg/l	1/4 hrs	Composite		X	(5)
Solids, Settleable	Daily Maximum	0.8	ml/l	1/4 hrs	Grab		X	(3)
Phosphorus	Monthly Average	Monitor	mg/l	1/4 hrs	Composite		X	(5), (8)
Ammonia	Monthly Average	Monitor	mg/l	1/4 hrs	Composite		X	(5)
Chlorine, Total Residual	Daily Maximum	0.1	mg/l	1/4 hrs	Grab		X	(1),(3), (4)
Coliform, Fecal	30-day Geometric Mean	200	#/100ml	1/4 hrs	Grab		X	(4)
Oil & Grease	Daily Maximum	Monitor	mg/l	1/4 hrs	Grab		X	(3)
Floatable Material	Daily	Substantial Removal	Visual Observation	1/4 hrs	Visual Observation		X	(6), (7)

FOOTNOTES:

- (1) Flows from 126.3 up to 240 MGD shall receive primary treatment and will be discharged via outfall 002 with chlorination/dechlorination capacity. All influent flows greater than 240 MGD will be discharged via outfall 001. Disinfection will be performed on all flows between April 1 and October 15.
- (2) Flows shall be continuously recorded and totalized. Flows reported on the monthly operating report shall be the total flow discharge for the calendar month reporting period.
- (3) Daily Maximum shall be calculated based on the arithmetic mean of samples taken during any event.
- (4) Effluent Disinfection required: seasonal from April 1 to October 15. Monitoring of these parameters is only required during the period when disinfection is required. The limit of 200/100 ml for fecal coliform is effective on April 1, 2016. Until April 1, 2016, monitoring is required and shall be reported on the DMRs.
- (5) Sample type shall be composite of grab samples, one taken every four hours.
- (6) Visual observation required every four hours during each event.
- (7) The permittee shall institute procedures to ensure substantial removal of floatable materials for the duration of the bypass events as indicated by visual observations during the events.
- (8) Final limit determination will be based on lake/watershed models and subsequent TMDL analysis and allocation process.
- (9) A bypass event starts at the moment wastewater overflows the bypass tank and continues until the overflow from the bypass tank stops. Sampling during each bypass event shall occur within the first 30 minutes of the bypass and every 4 hours thereafter. If the bypass does not occur for more than 30 minutes, it is not necessary to collect a sample.

IV. WHOLE EFFLUENT TOXICITY (WET) TESTING PROGRAM

PARAMETER	EFFLUENT LIMIT		PQL	MONITORING ACTION LEVEL		UNITS	SAMPLE FREQUENCY	SAMPLE TYPE
	Monthly Avg.	Daily Max.	Daily Max.	TYPE I	TYPE II			
WET - Acute Invertebrate				monitor		TUa	Quarterly	Footnote 1
WET - Acute Vertebrate				monitor		TUa	Quarterly	Footnote 1
WET - Chronic Invertebrate				2.0		TUc	Quarterly	Footnote 1
WET - Chronic Vertebrate				2.0		TUc	Quarterly	Footnote 1

Footnote 1. Whole Effluent Toxicity (WET) Testing:

Testing Requirements - WET testing shall consist of **Chronic testing**. WET testing shall be performed in accordance with 40 CFR Part 136 and TOGS 1.3.2 unless prior written approval has been obtained from the Department. The test species shall be *Ceriodaphnia dubia* (water flea - invertebrate) and *Pimephales promelas* (fathead minnow - vertebrate). Receiving water collected upstream from the discharge should be used for dilution. All tests conducted should be static-renewal (two 24-hr composite samples with one renewal for Acute tests and three 24-hr composite samples with two renewals for Chronic tests). The appropriate dilution series bracketing the IWC and including one exposure group of 100% effluent should be used to generate a definitive test endpoint, otherwise an immediate rerun of the test is required. WET testing shall be coordinated with the monitoring of chemical and physical parameters limited by this permit so that the resulting analyses are also representative of the sample used for WET testing. The ratio of critical receiving water flow to discharge flow (i.e. dilution ratio) is 0.5:1 for acute, and 1:1 for chronic. Discharges which are disinfected using chlorine should be dechlorinated prior to WET testing or samples shall be taken immediately prior to the chlorination system.

Monitoring Period - WET testing shall be performed at the specified sample frequency for the duration of the permit / during calendar years ending in 2 and 7 .

Reporting - Toxicity Units shall be calculated and reported on the DMR as follows: $TUa = (100)/(48\text{-hr LC50})$ or $(100)/(48\text{-hr EC50})$ (note that Acute data is generated by both Acute and Chronic testing) and $TUc = (100)/(NOEC)$ when Chronic testing has been performed or $TUc = (TUa) \times (10)$ when only Acute testing has been performed and is used to predict Chronic test results, where the 48-hr LC50 or 48-hr EC50 and NOEC are expressed in % effluent. This must be done for both species and using the Most Sensitive Endpoint (MSE) or the lowest NOEC and corresponding highest TUc. Report a TUa of 0.3 if there is no statistically significant toxicity in 100% effluent as compared to control.

The complete test report including all corresponding results, statistical analyses, reference toxicity data, daily average flow at the time of sampling and other appropriate supporting documentation, shall be submitted within 60 days following the end of each test period to the Toxicity Testing Unit. A summary page of the test results for the invertebrate and vertebrate species indicating TUa, 48-hr LC50 or 48-hr EC50 for Acute tests and/or TUc, NOEC, IC25, and most sensitive endpoints for Chronic tests, should also be included at the beginning of the test report.

WET Testing Action Level Exceedances - If an action level is exceeded then the Department may require the permittee to conduct additional WET testing including Acute and/or Chronic tests. Additionally, the permittee may be required to perform a Toxicity Reduction Evaluation (TRE) in accordance with Department guidance. If such additional testing or performance of a TRE is necessary, the permittee shall be notified in writing by the Regional Water Engineer. The written notification shall include the reason(s) why such testing or a TRE is required.

V. PRETREATMENT PROGRAM IMPLEMENTATION REQUIREMENTS

A. **DEFINITIONS.** Generally, terms used in this Section shall be defined as in the General Pretreatment Regulations (40 CFR Part 403). Specifically, the following definitions apply to terms used in this Section (PRETREATMENT PROGRAM IMPLEMENTATION REQUIREMENTS):

1. **Categorical Industrial User (CIU)**- an industrial user of the POTW that is subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N;
2. **Local Limits** - General Prohibitions, specific prohibitions and specific limits as set forth in 40 CFR 403.5.
3. **The Publicly Owned Treatment Works (the POTW)** - as defined by 40 CFR 403.3(o) and that discharges in accordance with this permit.
4. **Program Submission(s)** - requests for approval or modification of the POTW Pretreatment Program submitted in accordance with 40 CFR 403.11 or 403.18 and approved by letter dated June 11, 1984.
5. **Significant Industrial User (SIU)** -
 - a. CIUs;
 - b. Except as provided in 40 CFR 403.3(t)(2), any other industrial user that discharges an average of 25,000 gallons per day or more of process wastewater (excluding sanitary, non-contact cooling and boiler blowdown wastewater) to the POTW;
 - c. Except as provided in 40 CFR 403.3(t)(2), any other industrial user that contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant;
 - d. Any other industrial user that the permittee designates as having a reasonable potential for adversely affecting the POTW's operation or for violating a pretreatment standard or requirement.
6. **Substances of Concern** - Substances identified by the New York State Department of Environmental Conservation Industrial Chemical Survey as substances of concern.

B. **IMPLEMENTATION.** The permittee shall implement a POTW Pretreatment Program in accordance 40 CFR Part 403 and as set forth in the permittee's approved Program Submission(s). Modifications to this program shall be made in accordance with 40 CFR 403.18. Specific program requirements are as follows:

1. **Industrial Survey.** To maintain an updated inventory of industrial dischargers to the POTW the permittee shall:
 - a. Identify, locate and list all industrial users who might be subject to the industrial pretreatment program from the pretreatment program submission and any other necessary, appropriate and available sources. This identification and location list will be updated, at a minimum, every five years. As part of this update the permittee shall collect a current and complete New York State Industrial Chemical Survey form (or equivalent) from each SIU.
 - b. Identify the character and volume of pollutants contributed to the POTW by each industrial user identified in B.1.a above that is classified as a SIU.
 - c. Identify, locate and list, from the pretreatment program submission and any other necessary, appropriate and available sources, all significant industrial users of the POTW.
2. **Control Mechanisms.** To provide adequate notice to and control of industrial users of the POTW the permittee shall:

- a. Inform by certified letter, hand delivery courier, overnight mail, or other means which will provide written acknowledgment of delivery, all industrial users identified in B.1.a. above of applicable pretreatment standards and requirements including the requirement to comply with the local sewer use law, regulation or ordinance and any applicable requirements under section 204(b) and 405 of the Federal Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.
 - b. Control through permit or similar means the contribution to the POTW by each SIU to ensure compliance with applicable pretreatment standards and requirements. Permits shall contain limitations, sampling frequency and type, reporting and self-monitoring requirements as described below, requirements that limitations and conditions be complied with by established deadlines, an expiration date not later than five years from the date of permit issuance, a statement of applicable civil and criminal penalties and the requirement to comply with Local Limits and any other requirements in accordance with 40 CFR 403.8(f)(1).
3. Monitoring and Inspection. To provide adequate, ongoing characterization of non-domestic users of the POTW, the permittee shall:
- a. Receive and analyze self-monitoring reports and other notices. The permittee shall require all SIUs to submit self-monitoring reports at least every six months unless the permittee collects all such information required for the report, including flow data.
 - b. The permittee shall adequately inspect each SIU at a minimum frequency of once per year.
 - c. The permittee shall collect and analyze samples from each SIU for all priority pollutants that can reasonably be expected to be detectable at levels greater than the levels found in domestic sewage at a minimum frequency of once per year.
 - d. Require, through permits, each SIU to collect at least one 24 hour, flow proportioned composite (where feasible) effluent sample every six months and analyze each of those samples for all priority pollutants that can reasonably be expected to be detectable in that discharge at levels greater than the levels found in domestic sewage. The permittee may perform the aforementioned monitoring in lieu of the SIU except that the permittee must also perform the compliance monitoring described in 3.c.
4. Enforcement. To assure adequate, equitable enforcement of the industrial pretreatment program the permittee shall:
- a. Investigate instances of noncompliance with pretreatment standards and requirements, as indicated in self-monitoring reports and notices or indicated by analysis, inspection and surveillance activities. Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions. Enforcement activities shall be conducted in accordance with the permittee's Enforcement Response Plan developed and approved in accordance with 40 CFR Part 403.
 - b. Enforce compliance with all national pretreatment standards and requirements in 40 CFR Parts 406 - 471.
 - c. Provide public notification of significant non-compliance as required by 40 CFR 403.8(f)(2)(vii).
 - d. Pursuant to 40 CFR 403.5(e), when either the NYSDEC or the USEPA determines any source contributes pollutants to the POTW in violation of Pretreatment Standards or Requirements the NYSDEC or the USEPA shall notify the permittee. Failure by the permittee to commence an appropriate investigation and subsequent enforcement action within 30 days of this notification may result in appropriate enforcement action against the source and permittee.
5. Record keeping. The permittee shall maintain and update, as necessary, records identifying the nature, character, and volume of pollutants contributed by SIUs. Records shall be maintained in accordance with Part 11. Section 10.3.a.
6. Staffing. The permittee shall maintain minimum staffing positions committed to implementation of the Industrial Pretreatment Program in accordance with the approved pretreatment program.

- C. SLUDGE DISPOSAL PLAN. The permittee shall notify NYSDEC and USEPA as long as USEPA remains the approval authority, 60 days prior to any major proposed change in the sludge disposal plan. NYSDEC may require additional pretreatment measures or controls to prevent or abate an interference incident relating to sludge use or disposal.
- D. REPORTING. The permittee shall provide to the offices listed on the Monitoring, Reporting and Recording page of this permit and to the Chief-Water Permits and Compliance Branch; USEPA Region II; 290 Broadway ; New York, NY 10007; a periodic report, prepared and submitted in accordance with the consistent periodic reporting format established by the NYSDEC in the document entitled NYSDEC POTW Periodic Pretreatment Report - 1994, that briefly describes the permittee's program activities over the previous year. This report shall be submitted to the above noted offices within 90 days of the end of the reporting period. The reporting period shall be ANNUAL with reporting period(s) ending on December 31.

The periodic report shall include:

1. Industrial Survey. Updated industrial survey information in accordance with 40 CFR 403.12(I)(1) (including any NYS Industrial Chemical Survey forms updated during the reporting period).
2. Implementation Status. Status of Program Implementation, to include:
 - a. Any interference, upset or permit violations experienced at the POTW directly attributable to industrial users.
 - b. Listing of significant industrial users issued permits.
 - c. Listing of significant industrial users inspected and/or monitored during the previous reporting period and summary of results.
 - d. Listing of significant industrial users notified of promulgated pretreatment standards or applicable local standards who are on compliance schedules. The listing should include for each facility the final date of compliance.
 - e. Summary of POTW monitoring results not already submitted on Discharge Monitoring Reports and toxic loadings from SIU's organized by parameter.
 - f. A summary of additions or deletions to the list of SIUs, with a brief explanation for each deletion.
3. Enforcement Status. Status of enforcement activities to include:
 - a. Listing of significant industrial users in Significant Non-Compliance (as defined by 40 CFR 403.8(f)(2)(vii)) with federal or local pretreatment standards at end of the reporting period.
 - b. Summary of enforcement activities taken against non-complying significant industrial users. The permittee shall provide a copy of the public notice of significant violators as specified in 40 CFR Part 403.8(f)(2)(vii).

VI. BEST MANAGEMENT PRACTICES FOR COMBINED SEWER OVERFLOWS

The permittee shall implement the following Best Management Practices (BMPs). These BMPs are designed to implement operation & maintenance procedures, utilize the existing treatment facility and collection system to the maximum extent practicable, and implement sewer design, replacement and drainage planning, to maximize pollutant capture and minimize water quality impacts from combined sewer overflows. The BMPs are equivalent to the "Nine Minimum Control Measures" required under the USEPA National Combined Sewer Overflow policy.

1. CSO Maintenance/Inspection - The permittee shall inspect and maintain all CSO structures, regulators, pumping stations, and the combined sewer systems to ensure that they are in good working condition. This inspection shall include, but not be limited to, all regulators tributary to these CSO structures, and shall be conducted during periods of both dry and wet weather. This is to insure that no discharges occur during dry weather and that the maximum amount of wet weather flow is conveyed to the Metropolitan Syracuse POTW for treatment. This program shall consist of inspections with required repair, cleaning and maintenance done as needed. This program shall consist of weekly inspections.

Inspection reports shall be completed indicating visual inspection, any observed flow, incidence of rain or snowmelt, condition of equipment and work required. These reports shall be in a format approved by the NYSDEC Region 7 Office and submitted to the Region with the monthly operating report (Form 92-15-7).

2. Maximum Use of Collection System for Storage - The permittee shall optimize the collection County system by operating and maintaining it to minimize the discharge of pollutants from CSOs. It is intended that the maximum amount of in-system storage capacity be used (without causing service backups) to minimize CSOs and convey the maximum amount of combined sewage to the Metropolitan Syracuse treatment plant in accordance with Item 4 below.

This shall be accomplished by an evaluation of the hydraulic capacity of the system but should also include a continuous program of flushing or cleaning to prevent deposition of solids and the adjustment of regulators and weirs to maximize storage.

3. Industrial Pretreatment - Discharge of persistent toxics upstream of CSOs will be in accordance with guidance under (NYSDEC Division of Water Technical and Operational Guidance Series (TOGS) 1.3.8 New Discharges to POTWs. For industrial operations characterized by use of batch discharge, consideration shall be given to the feasibility of a schedule of discharge during conditions of no CSO. For industrial discharges characterized by continuous discharge, consideration must be given to the collection system capacity to maximize delivery of waste to the treatment plant. Non-contact cooling water should be excluded from the combined system to the maximum extent practicable. Direct discharges of cooling water must apply for a SPDES permit.

To the maximum extent practicable, consideration shall be given to maximize the capture of industrial waste containing toxic pollutants and this wastewater should be given priority over residential/commercial service areas for capture and treatment by the POTW. For new industry, these factors shall be considered in siting with preference to service by areas not tributary to CSOs or having sufficient capacity to deliver all industrial wastewater during all conditions to the POTW.

4. Maximize Flow to POTW - Factors cited in Item 2 above shall also be considered in maximizing flow to the POTW. Maximum delivery to the POTW is particularly critical in treatment of "first-flush" flows. The Metropolitan Syracuse treatment plant shall be capable of receiving the peak design hydraulic loading rates for all process units. The Metropolitan Syracuse treatment plant shall be capable of: receiving a minimum of 168.4 MGD through the plant head works; a minimum of 168.4 MGD through the primary treatment works (and disinfection works if applicable); and a minimum of 126.3 MGD through the secondary treatment works during wet weather. The collection system and headworks must be capable of delivering these flows during wet weather. If the permittee cannot deliver maximum design flow for treatment, the permittee shall submit a plan and schedule for accomplishing this requirement to the NYSDEC Region 7 Water Engineer within 12 months after the effective date of this permit.

5. Wet Weather Operating Plan - The permittee shall maximize treatment during wet weather events. This shall be accomplished by having a wet weather operating plan containing procedures so as to operate unit processes to treat maximum flows while not appreciably diminishing effluent quality or destabilizing treatment upon return to dry weather operation. The wet weather operations plan shall be submitted to the Regional Water Engineer, Region 7 Office for review and approval within 12 months after the effective date of this permit modification. The wet weather operating plan shall consider all the CSO facilities in Appendix A of this permit.

The submission of a wet weather operating plan is a one time requirement that shall be done to the NYSDEC's satisfaction once. However, a revised wet weather operating plan must be submitted if the POTW and/or sewer collection system is replaced or modified in a manner that impact flows at WWOP. When this permit is administratively renewed by NYSDEC letter entitled "SPDES NOTICE/RENEWAL APPLICATION/PERMIT", the permittee is not required to repeat the submission. The above due dates are independent from the effective date of the permit stated in the letter of "SPDES NOTICE/RENEWAL APPLICATION/PERMIT"

6. Prohibition of Dry Weather Overflow - Dry weather overflows from the combined sewer system are prohibited. The occurrence of any dry weather overflow shall be promptly abated and reported to the NYSDEC Region 7 Water Engineer within 24 hours from when first realized by the permittee. A written report shall also be submitted within fourteen (14) days of the time the permittee becomes aware of the occurrence. Such reports shall contain the information listed in the 6 NYCRR Part 750-2.7(c).
7. Control of Floatable and Settleable Solids - The discharge of floating solids, oil and grease, or solids of sewage origin which cause deposition in the receiving waters, is a violation of the NYS Narrative Water Quality Standards contained in Part 703. As such, the permittee shall implement, within the collection system owned and operated by the permittee, best management practices (BMPs) in order to eliminate or minimize the discharge of these substances. All of the measures cited in Items 1, 2, 4 & 5 above shall constitute approvable BMPs for mitigation of this problem. If aesthetic problems persist, the permittee should consider additional BMP's including but not limited to: street sweeping, litter control laws, installation of floatables traps in catch basins (such as hoods), booming and skimming of CSOs, and disposable netting on CSO outfalls. In cases of severe or excessive floatables generation, booming and skimming should be considered an interim measure prior to implementation of final control measures. Public education on harmful disposal practices of personal hygienic devices may also be necessary including but not limited to: public broadcast television, printed information inserts in sewer bills, or public health curricula in local schools.
8. Combined Sewer System Replacement - Replacement of combined sewers shall not be designed or constructed unless approved by NYSDEC. When replacement of a combined sewer is necessary it shall be replaced by separate sanitary and storm sewers to the greatest extent possible. These separate sanitary and storm sewers shall be designed and constructed simultaneously but without interconnections to maximum extent practicable. When combined sewers are replaced, the design should contain cross sections which provide sewage velocities which prevent deposition of organic solids during low flow conditions.
9. Combined Sewer/Extension - Combined sewer/extension, when allowed should be accomplished using separate sewers. These sanitary and storm sewer extensions shall be designed and constructed simultaneously but without interconnections. No new source of storm water shall be connected to any separate sanitary sewer in the collection system.

If separate sewers are to be extended from combined sewers, the permittee shall demonstrate the ability of the sewerage system to convey, and the treatment plant to adequately treat, the increased dry-weather flows. Upon a determination by the NYSDEC Region 7 Regional Water Engineer an assessment shall be made by the permittee of the effects of the increased flow of sanitary sewage or industrial waste on the strength of CSOs and their frequency of occurrence including the impacts upon best usage of the receiving water. This assessment should use techniques such as collection system and water quality modeling contained in the 1999 Water Environment Federation Manual of Practice FD-17 entitled, Prevention and Control of Sewer System Overflows, 2nd edition.
10. Sewer Connection and Extension Prohibitions - If, there are documented, recurrent instances of sewage backing up into house(s) or discharges of raw sewage onto the ground surface from surcharging manholes, the permittee shall, upon letter notification from DEC, prohibit further connections that would make the surcharging/back-up problems worse.
11. Septage and Hauled Waste - The discharge or release of septage or hauled waste upstream of a CSO is prohibited.
12. Control of Run-off - It is recommended that the impacts of run-off from development and re-development in areas served by combined sewers be reduced by requiring compliance with the New York Standards for Erosion and Sediment Control (<http://www.dec.ny.gov/chemical/29066.html>) and the quantity control requirements included in the New York State Stormwater Management Design Manual (<http://http://www.dec.ny.gov/chemical/29072.html/>).
13. Public Notification - The permittee shall continue to maintain identification signs at all CSO outfalls owned and operated by the permittee. The permittee shall place the signs at or near the CSO outfalls and ensure that the signs are easily readable by the public. The signs shall have **minimum** dimensions of eighteen inches by twenty-four inches (18" x 24") and shall have

white letters on a green background and contain the following information:

N.Y.S. PERMITTED DISCHARGE POINT (wet weather discharge) SPDES PERMIT No.: NY _____	
OUTFALL No. : _____	
For information about this permitted discharge contact:	
Permittee Name:	
Permittee Contact:	
Permittee Phone:	() - ### - ####
OR:	
NYSDEC Division of Water Regional Office Address :	
NYSDEC Division of Water Regional Phone:	() - ### - ####

The permittee shall implement a public notification program to inform citizens of the location and occurrence of CSO events. This program shall include a mechanism (public media broadcast, standing beach advisories, newspaper notice etc.) to alert potential users of the receiving waters affected by CSOs. The program shall include a system to determine the nature and duration of conditions that are potentially harmful to users of these receiving waters due to CSOs.

14. Characterization and Monitoring - The permittee shall characterize the County's combined sewer system, determine the frequency of overflows, and identify CSO impacts in accordance with Combined Sewer Overflows, Guidance for Nine Minimum Controls, USEPA, 1995, Chapter 10. These are minimum requirements, more extensive characterization and monitoring efforts which may be required as part of the Long-Term Control Plan.
15. Annual report - The permittee shall submit an annual report summarizing implementation of the above best management practices (BMPs). The report shall list existing documentation of implementation of the BMPs and shall be submitted by January 31st of each year to the offices listed on the Recording, Reporting and Additional Monitoring page of this permit. Examples of recommended documentation of the BMPs are found in Combined Sewer Overflows, Guidance for Nine Minimum Controls, USEPA, 1995. The actual documentation shall be stored at a central location and be made available to DEC upon request. The permittee may obtain an electronic copy of the NMC guidance at <http://www.epa.gov/npdes/pubs/owm0030.pdf>. For guidance, the permittee may obtain a BMP checklist at http://www.dec.ny.gov/docs/water_pdf/csobmp.pdf. The permittee must submit a completed copy of this checklist along with your annual report.

VII.

CSO LONG-TERM CONTROL PLAN

NYSDEC and the permittee entered into a federal Amended Consent Judgment (ACJ), effective January 20, 1998 concerning the permittee's Combined Sewer Overflow (CSO) abatement program. This ACJ governs the permittee's obligations regarding design and construction of facilities required under the NYSDEC-approved facility plans. After reviewing the ACJ, NYSDEC determined that the CSO abatement program required by the ACJ is consistent with the Long-term Control Plan (LTCP) required under the USEPA CSO Control Policy.

For the duration of a LTCP development, permittees are required to submit an annual report describing the progress/status on the LTCP. However, the Onondaga County is currently required under the ACJ (Page 1, Exhibit A (II)) to submit a monthly progress report on their CSO program. This monthly progress report will supersede the reporting requirement of the LTCP until such a time as monthly reports are no longer required by the federal ACJ.

VIII. SANITARY SEWER OVERFLOWS PROHIBITED

In accordance with 6 NYCRR Part 750-2.8(b)(2) and 40 CFR 122.41, bypass of the collection and treatment system without treatment are prohibited except when (1) the bypass is necessary to prevent loss of life, personal injury, public health hazard or severe property damage and (2) there is no feasible alternative to the bypass and (3) the permittee complies with the notice requirements in 6 NYCRR Part 750-2.7.

Bypassing from the following sanitary sewer overflow points in the Metropolitan Syracuse POTW system that are known to or have the potential to be bypass points is prohibited except as noted above:

Outfall No.	Description	Latitude/Longitude	Receiving Water
068	Westside Pump Station	43° 04' 10" N/76° 04' 10" W	Onondaga Lake
069	Hillcrest Pump Station	43° 02' 11" N/76° 11' 38" W	Harbor Brook
070	Brookside Pump Station	43° 02' 10" N/76° 11' 38" W	Harbor Brook
084	Ley Creek Pump Station	43° 05' 21" N/76° 09' 37" W	Ley Creek
085	Liverpool Pump Station	43° 05' 52" N/76° 12' 04" W	Bloody Brook
086	Town of Salina- Manhole @ Toas Ave. and Young Ave.	N 43° 05.56/W 076° 08.59'	Ley Creek
087	Town of Salina- Manhole @ Garden City Drive	N 43° 05.27/W 07° W 09.74'	Ley Creek
088	OCDWEP- Westside Trunk Sewer manhole @ Bronson Road	N 42° 02.80/W 076° 13.11'	Geddes Brook
089	OCDWEP - Westside Trunk Sewer/Crucible	N 43° 04.30/W 076° 12.28'	Tributary 5A
090	OCDWEP - Floradale Road Manhole	N 43° 06.15/W 076° 11.88'	West Branch of Bloody Brook
091	OCDWEP - Ley Creek Pump Station	N 43° 05.27/W 076° 09.74'	Ley Creek
092	OCDWEP - Viking Place Manhole	N 43° 05.99/W 076° 11.61'	West Branch of Bloody Brook
093	OCDWEP - Electronics Park Trunk Sewer Manhole	N 43° 05.91/W 076° 11.49'	East Branch of Bloody Brook

IX. BEST MANAGEMENT PRACTICES FOR SANITARY SEWER SYSTEMS WITH ACTIVE OVERFLOWS WITHIN THE SEPARATE SEWER SYSTEMS OWNED AND OPERATED BY THE COUNTY

1. Dry weather overflows of the sewer system are prohibited. The occurrence of any dry weather overflow shall be promptly abated and reported to the NYSDEC Region 7 Water Engineer within 24 hours of detection. A written compliance report shall also be provided within five days of the time the permittee becomes aware of the occurrence. Such reports shall contain the information listed in the 6 NYCRR Part 750-2.8(b)(2) and 40 CFR 122.41.
2. The permittee shall optimize the sewer system by operating and maintaining it to minimize the discharge of pollutants from overflows.
3. No new source of storm water shall be connected to any separate sanitary sewer in the collection system.
4. Sanitary sewer extensions shall be designed and constructed without storm sewer interconnections.
5. The permittee shall maximize flow up to the peak design capacity to the POTW Treatment Plant during periods of wet weather.
6. The permittee shall submit to the NYSDEC Region 7 Water Engineer a Monthly Overflow Report summarizing, for each day that an overflow occurs any overflow points, an estimate of the total volume and duration of each overflow, measurements of the total amount of rainfall, a description of the source of each overflow and visual observations of water quality at each outfall.
7. The permittee shall conduct a maintenance and inspection program of pumping stations and the overflow facilities at all outfalls on page 20 of this permit. This program shall consist of inspections performed at least on a monthly basis, with required repair, cleaning and maintenance done as needed. This is to insure that no discharges occur during dry weather and that the maximum amount of wet weather flow is conveyed to the wastewater treatment plant for treatment. All maintenance and inspection program activities including visual observations of the condition of equipment and any repair work required shall be summarized and attached with the Monthly Overflow Report.
8. By attaching a letter to the monthly operating report, the permittee shall inform the NYSDEC Region 7 Water Engineer of all reported instances known to the permittee of sewage backing up into houses or discharge of raw sewage from surcharging manholes onto the ground surface and the conditions (wet weather, sewer blockage, etc) which caused this to occur.
9. If there are documented, recurrent instances of sewage backing up into house(s) or discharge of raw sewage onto the ground surface from surcharging manhole(s) the permittee shall, upon letter notification from NYSDEC, prohibit further connections, except as provided below, that would make the surcharging/backup problems worse.

Connections may be allowed by the permittee prior to long-term remediation of the problem provided that the units to be connected had received building permits prior to determination of a recurrent surcharging/backup situation; or (1) 'reasonable relief measures' have been taken to reduce infiltration/inflow flow rates and maximize sewage transmission in the area effected and (2) for each home equivalent to be connected, those measures will provide more than 5 gallons per minute (GPM) additional sewage transmission capacity to the area effected by surcharging/backup problems and (3) if long-term remediation is necessary, the permittee has entered consent order negotiations or is in compliance with an enforceable (permit or consent order) schedule to eliminate the recurrent surcharging/backup problems. In the event that negotiations to enter into a consent order are unsuccessful, the NYSDEC may, by letter notification, serve notice that all further connections that would make surcharging/backup problems worse will be prohibited.

The 'reasonable relief measures' taken and the connections allowed shall be summarized in a letter attachment to the monthly operating report.

'Reasonable relief measures' may include, but are not limited to, permanent disconnections of a sump pump, roof leader or a footing drain; substantial elimination of inflow and infiltration from a manhole; repair of cracked pipe, bad joint or house lateral connection; cleaning of sewage transmission devices such as sewers, force mains, and siphons; pump rehabilitation; rehabilitation of vent risers; etc.

X. SCHEDULE OF COMPLIANCE

A. Mercury Minimization Program

1. **General** - Within 12 months of the EDPM, the permittee shall develop, implement, and maintain a Mercury Minimization Program (MMP). The MMP is required because the 50ng/l permit limit exceeds the state-wide calculated water quality based effluent limit (WQBEL) of 0.7 ng/l for Total Mercury. The goal of the MMP will be to reduce mercury effluent levels in pursuit of the calculated WQBEL. Guidance is provided in NYSDEC TOGS 1.3.10.

2. **MMP Elements** - The MMP shall be documented in narrative form and shall include any necessary drawings or maps. Other related documents already prepared for the facility may be used as part of the MMP and may be incorporated by reference. As a minimum, the MMP shall include an on-going program consisting of: periodic monitoring designed to quantify and, over time, track the reduction of mercury; an acceptable control strategy for reducing mercury discharges via cost-effective measures, which may include more stringent control of tributary waste streams; and submission of annual status reports. All existing information and data regarding CSO and SSO monitoring shall be considered when preparing the MMP. The plan shall include sampling at CSOs and SSOs, performed on a rotating basis so as to be representative of all outfalls.

A. **Monitoring** - All permit-related mercury monitoring shall be performed using USEPA Methods 1631. Use of USEPA Method 1669 during sample collection is recommended. Unless otherwise specified, all samples shall be grabs. Monitoring at influent and other locations tributary to compliance points may be performed using either EPA Methods 1631 or 245.7. Monitoring of raw materials, equipment, treatment residuals, and other non-wastewater/non-stormwater substances may be performed using other methods as appropriate. Monitoring shall be coordinated so that the results can be effectively compared between internal locations and final outfalls. Minimum required monitoring is as follows:

- i. **Sewage Treatment Plant Influent & Effluent, CSO Outfalls, Type II SSO Outfalls** - Representative samples at each of these locations must be collected in accordance with the minimum frequency specified on the mercury permit limits page.
- ii. **Key Locations in the Collection System and Potential Significant Mercury Sources** - The minimum monitoring frequency at these locations shall be semi-annual. Monitoring of properly treated dental facility discharges is not required. See TOGS 1.3.10 for guidance on track down and definition of key locations.
- iii. **Hauled Wastes** - Hauled wastes which may contain significant mercury levels must be periodically tested prior to acceptance to ensure compliance with pretreatment/local limits requirements.
- iv. Additional monitoring must be completed as may be required elsewhere in this permit or upon NYSDEC request.

B. **Control Strategy** - An acceptable control strategy is required for reducing mercury discharges via cost-effective measures, including but not limited to more stringent control of industrial users and hauled wastes. The control strategy will become enforceable under this permit and shall contain the following minimum elements:

- i. **Pretreatment/Local Limits** - The permittee shall evaluate and revise current requirements in pursuit of the water quality goal.
- ii. **Periodic Inspection** - The permittee must inspect users as necessary to support the MMP. Each dental facility shall be inspected at least once every five years to verify compliance with the wastewater treatment and notification elements of 6NYCRR Part 374.4. Other mercury sources shall also be inspected once every five years. Alternatively, the permittee may develop an outreach program which informs these users of their responsibilities once every five years and is supported by a subset of site inspections. Monitoring shall be performed as required above.
- iii. **Systems with CSO & Type II SSO Outfalls** - Priority shall be given to controlling mercury sources upstream of CSOs and Type II SSOs through mercury reduction activities and/or controlled-release discharge. Effective control is necessary to avoid the need for the NYSDEC to establish mercury permit limits at these outfalls.
- iv. A file shall be maintained containing all MMP documentation, including the dental forms required by 6NYCRR Part 374.4, which shall be available for review by NYSDEC representatives.

C. **Annual Status Report** - An annual status report shall be submitted to the NYSDEC Region 7 Water Engineer and to the Bureau of Water Permits, Albany, summarizing: (a) all MMP monitoring results for the previous year; (b) a list of known and potential mercury sources; (c) all action undertaken pursuant to the strategy during the previous year, (d) actions planned for the upcoming year, and (e) progress toward the goal. The first annual status report is due EDP + 1 year and follow-up reports are due annually thereafter. Note that the complete MMP documentation need not be submitted to the NYSDEC unless otherwise requested.

3. **MMP Modification** - The MMP shall be modified whenever: (a) changes at the facility or within the collection system increase the potential for mercury discharges; (b) actual discharges exceed 50 ng/L; (c) a letter from the NYSDEC identifies inadequacies in the MMP; or, (d) pursuant to a permit modification.

B. Phenol and Iron

1. The permittee shall comply with the following schedule:

Action Code	Outfall Number(s)	Compliance Action for Phenol and Iron	Due Date
	001	<p>The permittee shall submit an approvable source track down plan including a schedule to address the concentrations of total phenols and total iron in the discharge. This plan shall include an identification, evaluation, prioritization and control strategy to bring the permittee into compliance with the WQBEL of 1.4 lbs/day for total phenol and reduce iron in the discharge to the extent practicable. While the NYSDEC, at the time of permit issuance, has a guidance value of 1.0 mg/l for total iron, there is currently no WQBEL for iron. The source track down plan shall be developed using the existing iron guidance value as a compliance goal. Please see footnote 10 on page 10 for more information. Two copies of the report must be sent to NYSDEC for approval. One copy is to be sent to the NYSDEC, Bureau of Water Permits, 625 Broadway, Albany, NY 12233-3505; one copy is to be sent to the NYSDEC Regional Water Engineer, Region 7.</p> <p>Implement approved plan</p> <p>Submit final report on plan implementation showing compliance with the phenol WQBEL and progress on the iron discharge reduction.</p>	<p>September 15, 2012</p> <p>Approval Date + 60 days</p> <p>Approval Date + 24 months</p>

2. The permittee shall submit a written notice of compliance or non-compliance with each of the above schedule dates no later than 14 days following each elapsed date, unless conditions require more immediate notice as prescribed in 6 NYCRR Part 750-1.2(a) and 750-2. All such compliance or non-compliance notification shall be sent to the locations listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS. Each notice of non-compliance shall include the following information:
 1. A short description of the non-compliance;
 2. A description of any actions taken or proposed by the permittee to comply with elapsed schedule requirements without further delay and to limit environmental impact associated with the non-compliance;
 3. A description or any factors which tend to explain or mitigate the non-compliance; and
 4. An estimate of the date the permittee will comply with the elapsed schedule requirement and an assessment of the probability that the permittee will meet the next scheduled requirement on time.

3. The permittee shall submit copies of any document required by the above schedule of compliance to NYSDEC Region 7 Water Engineer at the location listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS and to the NYSDEC Bureau of Water Permits, 625 Broadway, Albany, N.Y. 12233-3505, unless otherwise specified in this permit or in writing by the NYSDEC.

C. Combined Sewer Overflows

1) The permittee shall comply with the following schedule:

Action Code	Outfall Number(s)	Compliance Action for Combined Sewer Overflows	Due Date
	All CSOs	<p>The permittee shall submit to the Department an annual report consistent with the Department-approved Ambient Monitoring Plan which addresses compliance with the USEPA CSO strategy requirements, the SPDES permit, the ACJ and water quality standards. Information required for the ACJ annual report due on April 1 through the life of the ACJ as per paragraph 14H of the ACJ Fourth Stipulation and information required by this permit can be compiled in one report and submitted at the same time provided all required information is included. The intent is to consolidate information rather than duplicate. This annual report shall also document performance and results undertaken by the permittee including pretreatment requirements. At a minimum, the annual report shall include all items listed below:</p> <ol style="list-style-type: none"> 1. Combined Sewer Overflows: <ol style="list-style-type: none"> a. List all CSOs (closed and operational) with narrative description, latitude and longitude, corresponding outfall numbers, and a map showing respective locations; b. Describe each CSO service area (acreage, land use, land types, unique characteristics, accessibility, etc.), the estimated storm intensity required to activate the CSO, and the estimated flow discharged annually and how this was determined; c. Provide documentation that shows CSO closure; and d. List all flow monitoring devices for each CSO. Larger and representative CSOs shall be measured for flow. Justify if no flow monitoring is recommended. 2. Water Quality Monitoring: <ol style="list-style-type: none"> a. Include sampling of each water body that receives a CSO. Sampling shall be consistent with the revised AMP; and b. List measures to be taken to address water quality violations if detected. This shall include follow up sampling and source track down as appropriate and discuss measures taken to comply with the Pretreatment requirements. 3. The Annual Report shall include: <ol style="list-style-type: none"> a. Analytical results and measurements from all related sampling required by the AMP and permit; b. An evaluation of compliance with applicable USEPA CSO strategy requirements, the SPDES permit, the ACJ and water quality standards. Corrective measures shall be included for any areas of non-compliance; c. If a violation of any water quality standard is found, discuss in detail what actions were taken to address this violation including demonstrating compliance with Pretreatment requirements. Include actions necessary over the next 12 months to achieve compliance; d. A detailed description of measures taken over the last year to eliminate and reduce CSO discharge within the permittee's service area; e. The percent capture within the service area and a comparison to the ACJ capture requirements of 89.5 % by 12/31/2013; 91.4% by 12/31/2015; 93% by 12/31/2016; and 95% capture by 12/31/2018. If these requirements are not achieved, include a description of how compliance will be achieved; f. A brief description of measures anticipated over the next 12 months to reduce CSO volume and the estimated percent capture; g. Certification by an individual certified to practice engineering in NYS that the information provided is accurate and representative; and h. Reporting shall be consistent with the ACJ reporting requirements. 	Annually on April 1st

2) The permittee shall submit a written notice of compliance or non-compliance with each of the above schedule dates no later than 14 days following each elapsed date, unless conditions require more immediate notice as prescribed in 6 NYCRR Part 750-1.2(a) and 750-2. All such compliance or non-compliance notification shall be sent to the locations listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS. Each notice of non-compliance shall include the following information:

1. A short description of the non-compliance;
2. A description of any actions taken or proposed by the permittee to comply with the elapsed schedule requirements without further delay and to limit environmental impact associated with the non-compliance;
3. A description of any factors which tend to explain or mitigate the non-compliance; and
4. An estimate of the date the permittee will comply with the elapsed schedule requirement and an assessment

of the probability that the permittee will meet the next scheduled requirement on time.

- 3) The permittee shall submit copies of any document required by the above schedule of compliance to NYSDEC Region 7 Water Engineer at the location listed under the section of this permit entitled RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS and to the NYSDEC, Bureau of Water Permits, 625 Broadway, Albany, N.Y. 12233-3505, unless otherwise specified in this permit or in writing by the NYSDEC.

XI. STORM WATER POLLUTANT PREVENTION PLAN FOR POTWs WITH STORMWATER OUTFALLS

1. **General** - The Department has determined that stormwater discharges from POTWs with design flows at or above 1 MGD shall be covered under the SPDES permit. If the permittee has already submitted a Notice of Intent to the Department for coverage under the General Storm Water permit, the permittee shall submit a Notice of Termination to the Department upon receipt of this final SPDES permit containing the requirement to develop a SWPPP.

The permittee is required to develop, maintain, and implement a Storm Water Pollutant Prevention Plan (SWPPP) to prevent releases of significant amounts of pollutants to the waters of the State through plant site runoff; spillage and leaks; sludge or waste disposal; and other stormwater discharges including, but not limited to, drainage from raw material storage.

The SWPPP shall be documented in narrative form and shall include the 13 minimum elements below and plot plans, drawings, or maps necessary to clearly delineate the direction of stormwater flow and identify the conveyance, such as ditch, swale, storm sewer or sheet flow, and receiving water body. Other documents already prepared for the facility such as a Safety Manual or a Spill Prevention, Control and Countermeasure (SPCC) plan may be used as part of the SWPPP and may be incorporated by reference. A copy of the current SWPPP shall be submitted to the Department as required in item (2.) below and a copy must be maintained at the facility and shall be available to authorized Department representatives upon request.

2. **Compliance Deadlines** - The initial completed SWPPP shall be submitted by EDP + 6 months to the Regional Water Engineer. The SWPPP shall be implemented within 6 months of submission, unless a different time frame is approved by the Department. The SWPPP shall be reviewed annually and shall be modified whenever: (a) changes at the facility materially increase the potential for releases of pollutants; (b) actual releases indicate the SWPPP is inadequate, or (c) a letter from the Department identifies inadequacies in the SWPPP. The permittee shall certify in writing, as an attachment to the December Discharge Monitoring Report (DMR), that the annual review has been completed. All SWPPP revisions (with the exception of minimum elements - see item (4.B.) below) must be submitted to the Region 7 Water Engineer within 30 days. Note that the permittee is not required to obtain Department approval of the SWPPP (or of any minimum elements) unless notified otherwise. Subsequent modifications to or renewal of this permit does not reset or revise these deadlines unless a new deadline is set explicitly by such permit modification or renewal.

3. **Facility Review** - The permittee shall review all facility components or systems (including but not limited to material storage areas; in-plant transfer, process, and material handling areas; loading and unloading operations; storm water, erosion, and sediment control measures; process emergency control systems; and sludge and waste disposal areas) where materials or pollutants are used, manufactured, stored or handled to evaluate the potential for the release of pollutants to the waters of the State. In performing such an evaluation, the permittee shall consider such factors as the probability of equipment failure or improper operation, cross-contamination of storm water by process materials, settlement of facility air emissions, the effects of natural phenomena such as freezing temperatures and precipitation, fires, and the facility's history of spills and leaks. The relative toxicity of the pollutant shall be considered in determining the significance of potential releases.

The review shall address all substances present at the facility that are identified in Tables 6-10 of SPDES application Form NY-2C (available at <http://www.dec.state.ny.us/website/dcs/permits/olpermits/form2c.pdf>) as well as those that are required to be monitored by the SPDES permit.

4. **A. 13 Minimum elements** - Whenever the potential for a release of pollutants to State waters is determined to be present, the permittee shall identify Best Management Practices (BMPs) that have been established to prevent or minimize such potential releases. Where BMPs are inadequate or absent, appropriate BMPs shall be established. In selecting appropriate BMPs, the permittee shall consider good industry practices and, where appropriate, structural measures such as secondary containment and erosion/sediment control devices and practices. USEPA guidance for development of minimum elements of the SWPPP and BMPs is available in the September 1992 manual *Storm Water Management for Industrial Activities*, USEPA 832-R-92-006 (available on-line at <http://nepis.epa.gov/pubtitleOW.htm>) At a minimum, the plan shall include the following elements:

- | | | |
|-------------------------------|---------------------------|---------------------------------|
| 1. Pollution Prevention Team | 6. Security | 10. Spill Prevention & Response |
| 2. Reporting of BMP Incidents | 7. Preventive Maintenance | 11. Erosion & Sediment Control |

- | | | |
|-------------------------------------|--|--------------------------|
| 3. Risk Identification & Assessment | 8. Good Housekeeping | 12. Management of Runoff |
| 4. Employee Training | 9. Materials/Waste Handling,
Storage, & Compatibility | 13. Street Sweeping |
| 5. Inspections and Records | | |

Note that for some facilities, especially those with few employees, some of the above may not be applicable. It is acceptable in these cases to indicate "Not Applicable" for the portion(s) of the SWPPP that do not apply to your facility, along with an explanation, for instance if street sweeping did not apply because no streets exist at the facility.

B. Stormwater Pollution Prevention Plans (SWPPPs) Required for Discharges of Stormwater From Construction Activity to Surface Waters - As part of the erosion and sediment control element, a SWPPP shall be developed prior to the initiation of any site disturbance of one acre or more of uncontaminated area. Uncontaminated area means soils or groundwater which are free of contamination by any toxic or non-conventional pollutants identified in Tables 6-10 of SPDES application Form NY-2C. Disturbance of any size contaminated area(s) and the resulting discharge of contaminated stormwater is not authorized by this permit unless the discharge is under State or Federal oversight as part of a remedial program or after review by the Region 7 Water Engineer; nor is such discharge authorized by any SPDES general permit for stormwater discharges. SWPPPs are not required for discharges of stormwater from construction activity to groundwaters.

The SWPPP shall conform to the *New York Standards and Specifications for Erosion and Sediment Control* and *New York State Stormwater Management Design Manual*, unless a variance has been obtained from the Region 7 Water Engineer, and to any local requirements. The permittee shall submit a copy of the SWPPP and any amendments thereto to the local governing body and any other authorized agency having jurisdiction or regulatory control over the construction activity at least 30 days prior to soil disturbance. The SWPPP shall also be submitted to the Regional Water Engineer if contamination, as defined above, is involved and the permittee must obtain a determination of any SPDES permit modifications and/or additional treatment which may be required prior to soil disturbance. Otherwise, the SWPPP shall be submitted to the Department only upon request. When a SWPPP is required, a properly completed *Notice of Intent (NOI)* form shall be submitted (available at www.dec.state.ny.us/website/dow/toolbox/swforms.html) prior to soil disturbance. Note that submission of a NOI is required for informational purposes; the permittee is not eligible for and will not obtain coverage under any SPDES general permit for stormwater discharges, nor are any additional permit fees incurred. SWPPPs must be developed and submitted for subsequent site disturbances in accordance with the above requirements. The permittee is responsible for ensuring that the provisions of each SWPPP are properly implemented.

Note:

If the permittee is covered under the MS4 permit, the permittee may substitute this to satisfy some of the conditions in this SWPPP.

XII. DISCHARGE NOTIFICATION REQUIREMENTS

Sign Maintenance: The permittee shall periodically inspect the outfall identification sign(s) in order to ensure they are maintained, are still visible, and contain information that is current and factually correct. Signs that are damaged or incorrect shall be replaced within 3 months of inspection.

Data Retention: The permittee shall retain records for a minimum period of 5 years in accordance with 6NYCRR Part 750-1.12(b)(2) and Part 750-2.5(c)(1). These records, which include discharge monitoring reports (DMRs) and annual reports, must be retained at a repository accessible to the public. This repository shall be open to the public, at a minimum, during normal daytime business hours. The repository may be the business office, wastewater treatment plant, village, town, city, or county clerk's office, the local library, or other location approved by the Department.

XIV. RECORDING, REPORTING AND ADDITIONAL MONITORING REQUIREMENTS

- a) The permittee shall also refer to the 6 NYCRR Part 750 of this permit for additional information concerning monitoring and reporting requirements and conditions.
- b) The monitoring information required by this permit shall be summarized, signed and retained for a period of three years from the date of the sampling for subsequent inspection by the Department or its designated agent. **Also, monitoring information required by this permit shall be summarized and reported by submitting:**
- (if box is checked) completed and signed Discharge Monitoring Report (DMR) forms for each one month reporting period to the locations specified below. Blank forms are available at the Department's Albany office listed below. The first reporting period begins on the effective date of this permit and the reports will be due no later than the 28th day of the month following the end of each reporting period.
- (if box is checked) an annual report to the NYSDEC Region 7 Water Engineer at the address specified below. The annual report is due by February 1 and must summarize information for January to December of the previous year in a format acceptable to the Department.
- (if box is checked) a monthly "Wastewater Facility Operation Report..." (form 92-15-7) to the:
- | | |
|---|---|
| <input checked="" type="checkbox"/> NYSDEC Region 7 Water Engineer and/or | <input type="checkbox"/> County Health Department or Environmental Control Agency specified below |
|---|---|
- Send the **original** (top sheet) of each DMR page to:
- NYS Department of Environmental Conservation
Division of Water
Bureau of Water Compliance
625 Broadway
Albany, New York 12233-3506
- Phone: (518) 402-8177
- Send the **first copy** (second sheet) of each DMR page to:
- NYS Department of Environmental Conservation
Region 7 Water Engineer
615 Erie Boulevard West
Syracuse, New York 13204
- Phone: 315-426-7500
- c) Noncompliance with the provisions of this permit shall be reported to the Department as prescribed in the attached 6 NYCRR Part 750.
- d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit.
- e) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR Part 136 or as specified in this permit, the results of this monitoring shall be included in the calculations and recording of the data on the Discharge Monitoring Reports.
- f) Calculation for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in this permit.
- g) Unless otherwise specified, all information recorded on the Discharge Monitoring Report shall be based upon measurements and sampling carried out during the most recently completed reporting period.
- h) Any laboratory test or sample analysis required by this permit for which the State Commissioner of Health issues certificates of approval pursuant to section five hundred two of the Public Health Law shall be conducted by a laboratory which has been issued a certificate of approval. Inquiries regarding laboratory certification should be sent to the Environmental Laboratory Accreditation Program, New York State Health Department Center for Laboratories and Research, Division of Environmental Sciences, The Nelson A. Rockefeller Empire State Plaza, Albany, New York 12201.

APPENDIX A

MONITORING REQUIREMENTS FOR CSO TREATMENT FACILITIES

FACILITY	PAGE
Hiawatha Regional CSO Treatment Facility	A-1
Midland Regional Treatment Facility	A-3
Teall Floatables Control Facility	A-5
Butternut Floatables Control Facility	A-6
Burnet Floatables Control Facility	A-7
Maltbie Floatables Control Facility	A-8
Harbor Brook Floatables Control Facility #1(In-Stream Facility)	A-9
Erie Boulevard Storage System	A-10

Note:

Upon completion of engineering studies by the County for additional CSO controls, this permit may be revised to include additional approved CSO control facilities as required by the revised ACJ.

SPDES PERMIT NUMBER: NY 002 7081

MONITORING REQUIREMENTS FOR CSO TREATMENT FACILITIES

FACILITY: Hiawatha Regional CSO Treatment Facility

Outfall No: 074

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility. An overflow event starts once overflow out of the CSO regional facility begins, and ends once the overflow stops. Sampling during each discharge and/or bypass event shall occur within the first 60 minutes of the bypass per the table below. If the bypass does not occur for more than 30 minutes, it is not necessary to collect a sample. If another storm occurs before stored water is completely discharged back to Metro, sampling shall occur within 30 minutes of commencing bypass and monitoring shall resume as per the table below.

After review of the data, the Department may reopen the permit to add permit limits for these parameters at the Regional CSO Treatment Facility.

OVERFLOW PARAMETER	LIMITS, Per Event		UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Type	Limit				
Overflow Volume	Total ⁽⁵⁾	Monitor	MG	Each event	Calculated	(1)
Retained Volume	Total ⁽⁵⁾	Monitor	MG	Each event	Recorded, Totalized	(4)
BOD, 5-day	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Total Suspended Solids	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Settleable Solids	Average	Monitor	ml/l	1/4 hours	Grab	(2)
Oil & Grease	Average	Monitor	mg/l	1/4 hours	Grab	(2)
Floatable Material	Total	Monitor	days	Every 4 hours See Footnote 3	Visual Observation	(3)
Screenings	Monthly Total	Monitor	Cu. yds.	After each event	Measured	
Chlorine, Total Residual	Average	0.2	mg/l	1/4 hours	Grab	(2),(5), (6)
Fecal Coliform, geometric means	Geometric mean	200	No./100 ml	1/4 hours	Grab	(2)
Ammonia	Average	Monitor	mg/l	1/4 hours	Composite	(2)
TKN	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Total Phosphorous	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Precipitation	Total	Measure	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	

FOOTNOTES:

- No discharge except as caused by excess flows associated with the design storm for the regional CSO treatment facility.
- Samples shall be taken consistent with the Sampling Plan requirement in Special Condition #7 on Page A2.
- Visual observation required during each sampling event. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatable materials.
- The permittee shall measure and report each quarter the total volume of flow retained and returned to the Metropolitan Syracuse Wastewater Treatment Plant each event.
- The permittee shall use Method Chlorine by DPD Colorimetric Method (4500-Cl G) for Total Chlorine Residual and also for the following four additional analytes: Monochloramine, Chloramines, Total Dichloramine, and Chlorine.
- Effluent Disinfection required: seasonal from April 1 to October 15. Monitoring of these parameters is only required during the period when

SPDES PERMIT NUMBER: NY 002 7081

disinfection is required.

SPECIAL CONDITIONS FOR OPERATION OF HIAWATHA REGIONAL TREATMENT FACILITY

1. The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize CSO capture as well as pollutant removal. All flow measuring devices shall be calibrated in accordance with the Manufacturer's guidelines and specifications.
2. The permittee shall not divert to the regional CSO treatment facility unless the collection system and treatment plant flows are maximized according to the CSO BMP #4 in this permit.
3. The permittee shall not discharge from the regional CSO treatment facility unless the tank volume is full and the treatment process cannot accept additional wastewater.
4. The contents of the regional CSO treatment facility, (i.e. captured wastewater) shall not be delivered to the Metropolitan Syracuse Wastewater Treatment Plant at a rate which would exceed the peak daily or peak hourly design flow or loading. The regional treatment facility shall be emptied within the period provided for in the WWOP.
5. Flow shall not be delivered to the Metropolitan Syracuse Wastewater Treatment Plant at a rate that will cause an upset as defined by 6 NYCRR Part 750-2.8(c).
6. The permittee is required by CSO BMP #5 in this permit to submit a Wet Weather Operating Plan for the Metropolitan Syracuse Wastewater Treatment Plant and this facility. Upon DEC approval of the WWOP, the permittee shall operate the facility in accordance with the WWOP.
7. Within three months of the effective date of this permit, the permittee shall submit an approvable sampling plan for this RTF Outfall. The plan shall include, but not limited to, protocols for collecting grab and composite sampling consistence with the requirements on the above table for the RTF Outfall.

SPDES PERMIT NUMBER: NY 002 7081

MONITORING REQUIREMENTS FOR CSO TREATMENT FACILITIES

FACILITY: Midland Regional Treatment Facility

Outfall No: Main RTF outfall M01, Emergency Bypass outfall M02

The permittee shall monitor the following effluent overflow parameters and report the sampling results in the quarterly operating report. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP #15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility. An event starts once overflow out of the regional CSO facility begins, and ends once the overflow stops. Sampling during each discharge and/or bypass event shall occur within the first 60 minutes of the bypass per the table below. If the bypass does not occur for more than 30 minutes, it is not necessary to collect a sample. If another storm occurs before stored water is completely discharged back to Metro, sampling shall occur within 30 minutes of commencing bypass and monitoring shall resume as per the table below.

After review of the data, the Department may reopen the permit to add permit limits for these parameters at the CSO Regional Treatment Facility.

OVERFLOW PARAMETER	LIMITS, Per Event		UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
	Type	Limit				
Overflow Volume	Total ⁽⁵⁾	Monitor	MG	Each event	Calculated	(1)
Retained Volume	Total ⁽⁵⁾	Monitor	MG	Each event	Recorded, Totalized	(4)
BOD, 5-day	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Total Suspended Solids	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Settleable Solids	Average	Monitor	ml/l	1/4 hours	Grab	(2)
Oil & Grease	Average	Monitor	mg/l	1/4 hours	Grab	(2)
Floatable Material	Total	Monitor	days	Every 4 hours See Footnote 3	Visual Observation	(3)
Screenings	Monthly Total	Monitor	cu. yds.	After each event	Measured	
Chlorine, Total Residual,	Average	0.2	mg/l	1/4 hours	Grab	(2), (5), (6)
Fecal Coliform	Geometric mean	200	No./100 ml	1/4 hours	Grab	(2)
Ammonia	Average	Monitor	mg/l	1/4 hours	Composite	(2)
TKN	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Total Phosphorous	Average	Monitor	mg/l	1/4 hours	Composite	(2)
Precipitation	Total	Measure	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	

FOOTNOTES:

- No discharge except as caused by excess flows associated with the design storm for the regional CSO treatment facility.
- Samples shall be taken consistent with the Sampling Plan requirement in Special Condition #7 on Page A-4.
- Visual observation required during each sampling event. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatables material.
- The permittee shall measure and report each quarter the total volume of flow retained and returned to the Metropolitan Syracuse Wastewater Treatment Plant each event.
- The permittee shall use Method Chlorine by DPD Colorimetric Method (4500-Cl G) for Total Chlorine residual and also for the following four additional analytes: Monochloramine, Chloramines, Total Dichloramine and Chlorine.

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6. Effluent Disinfection required: seasonal from April 1 to October 15. Monitoring of these parameters is only required during the period when disinfection is required. Limits do not apply to Outfall M02 discharge; monitoring is required at M02.

SPECIAL CONDITIONS FOR OPERATION OF MIDLAND REGIONAL TREATMENT FACILITY

1. The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize CSO capture as well as pollutant removal. All flow measuring devices shall be calibrated in accordance with the Manufacturer's guidelines and specifications.
2. The permittee shall not divert to the regional CSO treatment facility unless the collection system and treatment plant flows are maximized according to the CSO BMP #4 in this permit.
3. The permittee shall not discharge from the regional CSO treatment facility unless the tank volume is full and the treatment process cannot accept additional wastewater.
4. The contents of the regional CSO treatment facility, (i.e. captured wastewater) shall not be delivered to the Metropolitan Syracuse Wastewater Treatment Plant at a rate which would exceed the peak daily or peak hourly design flow or loading. The regional treatment facility shall be emptied within the period provided for in the WWOP.
5. Flow shall not be delivered to the Metropolitan Syracuse Wastewater Treatment Plant at a rate that will cause an upset as defined by 6 NYCRR Part 750-2.8(c).
6. The permittee is required by CSO BMP #5 in this permit to submit a Wet Weather Operating Plan for the Metropolitan Syracuse Wastewater Treatment Plant and this facility. Upon DEC approval of the WWOP, the permittee shall operate the facility in accordance with the WWOP.
7. Within three months of the effective date of this permit, the permittee shall submit an approvable sampling plan for RTF Outfall. The plan shall include, but not limited to, protocols for collecting grab and composite sampling consistent with the requirements on the above table for the RTF Outfall.

MONITORING REQUIREMENTS FOR FLOATABLES CONTROL FACILITIES

FACILITY: Teall Floatables Control Facility

Outfall No: 073

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report⁽³⁾. After review of the data, the Department may reopen the permit to add permit limits for these parameters at the Floatables Control Facility.

OVERFLOW PARAMETER	REPORT	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Flow	total, per event ⁽²⁾	MG	Each event	Continuous	(1)
Precipitation	total, per event	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	
Floatable Material	total, per event	days	Each event	Visual Observation	(4)
Floatables Captured	total, per month	pounds	Each event	Measure	

FOOTNOTES:

- No discharge except as caused by excess flows associated with the design storm for the floatable control facility. All flow measuring devices shall be calibrated in accordance with the manufacturer's guidelines and specifications.
- An event starts once overflow out of the CSO floatables control facility begins, and ends once the overflow stops.
- In addition to the data supplied on the monthly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP # 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility.
- Visual observation required after each overflow event at the point of discharge. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatables material in the discharge at the outfall.

SPECIAL CONDITIONS FOR OPERATION OF TEALL FLOATABLES CONTROL FACILITY

- The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize floatables removal.
- The permittee shall perform an inspection of the combing screen system once per week.

MONITORING REQUIREMENTS FOR FLOATABLES CONTROL FACILITIES

FACILITY: Butternut Floatables Control Facility

Outfall No: 020

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report ⁽³⁾. After review of the data, the Department may reopen the permit to add permit limits for these parameters at the Floatables Control Facility.

OVERFLOW PARAMETER	REPORT	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Flow	total, per event ⁽⁴⁾	MG	Each event	Continuous	(1)
Floatable Material	total, per event	days	Each event	Visual Observation	(2)
Screenings	total, per month	pounds	See Footnote 5	Calculated	(5)
Precipitation	total, per event	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	

FOOTNOTES:

1. No discharge except as caused by excess flows associated with the design storm for the floatable control facility. All flow measuring devices shall be calibrated in accordance with the manufacturer's guidelines and specifications.
2. Visual observation required after each overflow event at the point of discharge. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatables material in the discharge at the outfall.
3. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP # 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, volume of overflow during each event, and provide an evaluation of the performance of the facility.
4. An event starts when flow passes through the net bags and ends when flow returns to the normal sewer channel.
5. Net bags shall be replaced when the net bags reach 35% design capacity or when bag function is inhibited. Weight per bag change shall also be recorded, and reported in pounds in the Discharge Monitoring Report.

SPECIAL CONDITIONS FOR OPERATION OF BUTTERNUT FLOATABLES CONTROL FACILITY

1. The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize floatables removal.
2. The permittee shall perform the inspection of the in-line netting system daily.

3. MONITORING REQUIREMENTS FOR FLOATABLES CONTROL FACILITIES

FACILITY: Burnet Floatables Control Facility

Outfall No: 021

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report ^(FN 3) After review of the data, the Department may reopen the permit to add permit limits for these parameters at the Floatables Control Facility.

OVERFLOW PARAMETER	REPORT	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Flow	total, per event ⁽⁴⁾	MG	Each event	Continuous	(1)
Floatable Material	total, per event	days	Each event	Visual Observation	(2)
Screenings	total, per month	pounds	See Footnote 5	Calculated	(5)
Precipitation	total, per event	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	

FOOTNOTES:

1. No discharge except as caused by excess flows associated with the design storm for the floatable control facility. All flow measuring devices installed to record overflows shall be calibrated in accordance with the manufacturer's guidelines and specifications.
2. Visual observation required after each overflow event at the point of discharge. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatables material in the discharge at the outfall.
3. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP # 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility.
4. An event starts when flow passes through the net bags and ends when flow returns to the normal sewer channel.
5. Net bags shall be replaced when the net bags reach 35% design capacity or when the flow-through capacity is inhibited. Weight per bag change shall also be recorded, and reported in pounds in the Discharge Monitoring Report.

SPECIAL CONDITIONS FOR OPERATION OF BURNET FLOATABLES CONTROL FACILITY

1. The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize floatables removal.
2. The permittee shall perform the inspection of the in line netting system daily.

3. MONITORING REQUIREMENTS FOR FLOATABLES CONTROL FACILITIES

FACILITY: Maltbie Floatables Control Facility

Outfall No: 066

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report^(FN 2). After review of the data, the Department may reopen the permit to add permit limits for these parameters at the Floatables Control Facility.

OVERFLOW PARAMETER	REPORT	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Flow	total, per event ⁽³⁾	MG	Each event	Continuous	(1)
Floatable Material	total, per event	days	Each event	Visual Observation	(4)
Screenings	total, per month	pounds	Each event	Calculated	(5)
Precipitation	total, per event	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	

FOOTNOTES:

1. No discharge except as caused by excess flows associated with the design storm for the floatables control facility. All flow measuring devices installed to record overflows shall be calibrated in accordance with the manufacturer's guidelines and specifications.
2. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP # 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility.
3. An event starts once overflow out of the floatables control facility begins, and ends once the overflow stops.
4. Visual observation required after each overflow event at the point of discharge. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatables material in the discharge at the outfall.
5. Net bags shall be replaced when the net bags reach 35% design capacity or when the flow-through capacity is inhibited. Weight per bag change shall also be recorded, and reported in pounds in the Discharge Monitoring Report.

SPECIAL CONDITIONS FOR OPERATION OF MALTBIIE FLOATABLES CONTROL FACILITY

1. The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize floatables removal.
2. The permittee shall perform the inspection of the in-line netting system daily.

3. MONITORING REQUIREMENTS FOR FLOATABLES CONTROL FACILITIES

FACILITY: Harbor Brook Floatables Control Facility #1 (In-Stream Facility)

Outfall No: N/A

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report⁽²⁾. After review of the data, the Department may reopen the permit to add permit limits for these parameters at the Floatables Control Facility.

OVERFLOW PARAMETER	REPORT	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Screenings	total, per bag change	pounds	Each change out	N/A	(1)
Floatable Material	total, per event	days	Each event	Visual Observation	(3)
Precipitation	total, per event	inches	Hourly/Each day of event	Auto, Recording Gauge within drainage area	

FOOTNOTES

1. Net bags shall be replaced when the net bags reach 35% design capacity or when the flow-through capacity is inhibited. Weight per bag change shall also be recorded, and reported in pounds in the Discharge Monitoring Report.
2. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP # 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility.
3. Visual observation required after each overflow event at the point of discharge. Report and list the number of days during the quarter where at least one visual observation indicates the presence of floatables material in the discharge at the outfall.

SPECIAL CONDITION FOR OPERATION OF HARBOR BROOK FLOATABLES CONTROL FACILITY #1

1. Onondaga County Department of Water Environment Protection shall modify the WWOP in CSO BMP# 5 to reflect the changes required for the facility including inspections.

MONITORING REQUIREMENTS FOR CSO TREATMENT FACILITIES

FACILITY: Erie Boulevard Storage System

Outfall No: 080

The permittee shall monitor the following effluent overflow parameters and report the sampling results on the quarterly operating report ⁽²⁾

OVERFLOW PARAMETER	REPORT	UNITS	SAMPLE FREQUENCY	SAMPLE TYPE	FN
Overflow Volume	total, per event ⁽³⁾	MG	Each event	Calculated	(1)(5)
Retained Volume	total, per event ⁽³⁾	MG	Each event	Recorded, Totalized	(4)
Precipitation	total, per event	inches	Hourly/Each day of event	Auto, Recording Gauge onsite	

FOOTNOTES:

1. No discharge except as caused by excess flows associated with the design storm for the Erie Boulevard Storage System.
2. In addition to the data supplied on the quarterly operating report, the permittee shall provide a summary of the required monitoring to be submitted annually as part of the CSO BMP report required in CSO BMP # 15 of this permit. The report shall tabulate sampling results, summarize the number of overflow events, the volume of overflow during each event, and provide an evaluation of the performance of the facility.
3. An event starts once overflow out of the Erie Boulevard Storage System begins, and ends once the overflow stops.
4. The permittee shall measure and record the total volume of flow retained and returned to the Metropolitan Syracuse Wastewater Treatment Plant each month.
5. Flow shall continuously be recorded and totaled.

SPECIAL CONDITIONS FOR OPERATION OF ERIE BOULEVARD STORAGE SYSTEM

1. The facility shall be operated in conjunction with the tributary sewer system, pump stations and the Metropolitan Syracuse Wastewater Treatment Plant to maximize CSO capture. All flow measuring devices installed to record overflows shall be calibrated in accordance with the Manufacture's guidelines and recommendations.
2. The permittee shall not divert to the Erie Boulevard Storage System unless the collection system and treatment plant flows are maximized according to the CSO BMP #4 in this permit.
3. The contents of the Erie Boulevard Storage System, (i.e. captured wastewater) shall not be delivered to the Metropolitan Syracuse Wastewater Treatment Plant at a rate which would exceed the peak daily or peak hourly design flow or loading. The Erie Boulevard Storage System shall be emptied within the period provided for in the WWOP.
4. Flow shall not be delivered to the Metropolitan Syracuse Wastewater Treatment Plant at a rate that will cause an upset as defined by 6 NYCRR Part 750-2.8 (c).
5. The permittee is required by CSO BMP # 5 in this permit to submit a Wet Weather Operating Plan for the Metropolitan Syracuse Wastewater Treatment Plant and this facility. Upon DEC approval of the WWOP, the permittee shall operate the facility in accordance with the WWOP.
6. Permittee shall perform routine inspection of gates to ensure proper operation.

FACT SHEET

ONONDAGA COUNTY METROPOLITAN SYRACUSE WWTP DEC ID# 7-3115-00113/00001, SPDES# NY 002 7081 December 2011

I. PURPOSE: The purpose of this fact sheet is to summarize the proposed major modifications to Onondaga County's Metropolitan Syracuse Wastewater Treatment Plant (Metro) permit.

II. PERMIT STATUS, FACILITY AND RECEIVING WATER DESCRIPTIONS:

The original State Pollutant Discharge Elimination System (SPDES) permit for this facility was issued by the New York State Department of Environmental Conservation (NYSDEC) in 1973; the permit has been renewed and/or modified since then and this fact sheet outlines the major changes proposed in this latest renewal. Past modifications reflected 1998 settlement issues between the State of New York, the Atlantic States Legal Foundation, and Onondaga County to address alleged violations of state and federal water pollution control laws. This settlement resulted in a federal Judgment on Consent which required the County to perform a series of engineering and scientific studies to evaluate the need for upgrading Metro and the need to address combined sewer overflows (CSOs) that occur in the Metro service area. As a result, the proposed draft permit now includes monitoring requirements for the following CSO treatment facilities:

Retention Facilities:

Erie Boulevard Storage System

Hiawatha Regional CSO Treatment Facility

Midland Regional Treatment Facility

Floatables Control Facilities:

Teall Floatables Control Facility (In-line)

Butternut Floatables Control Facility (In-line)

Burnet Floatables Control Facilities (In-line)

Maltbie Floatables Control Facility (End-of-pipe)

Harbor Brook Floatables Control Facility #1 (In-stream)

Current wastewater treatment plant processes include activated sludge treatment systems followed by two new treatment facilities: one to address ammonia removal and the other to reduce the phosphorous levels in the Metro discharge. Discharge from Metro is to class C waters of Onondaga Lake. Page 28 of the draft permit contains a current schematic of the Metro processes.

III. MODIFICATIONS:

A. OUTFALL LIST:

Table I.1 includes outfall 001A which is a tertiary treatment bypass utilized during emergency situations (e.g. repairs). Table I.2 on pages 3 through 5 of the proposed permit reflect the current list of CSO outfalls associated with Metro. CSO outfalls that were separated and converted to storm water outlets were deleted. Outfalls that were diverted to CSO facilities and eliminated

were also removed from the draft permit. Outfall 043 is associated with the Midland RTF and renamed M01 and M02 (emergency outfall).

Several sanitary sewer overflow (SSO) locations were added to the permit in Table I.3 on page 5. These locations were also added on page 20 of the draft permit which list prohibited sanitary sewer overflows and are, in addition to other locations, subject to, among other requirements, page 21 for Best Management Practices (BMPs) for Sewer Systems with Active Overflows.

B. PROPOSED PERMIT REVISIONS:

<u>Page</u>	<u>Item</u>	<u>Explanation</u>
4	Outfalls 071, 060/077	Outfall 071 was added. Outfalls 060 and 077 were combined since they share common coordinates.
8	Phosphorus	Additional monitoring requirements were added. Permittee will be required to report a 30-day arithmetic mean in order to monitor the daily performance of the phosphorus removal process.
8, 9	Phenols, Tetrachloroethene, Methylene Chloride, Butyl Benzyl Phthalate, Bis(2-ethylhexyl)phthalate, and Dibutylphthalate	Sample type was changed to "Composite" consistent with footnote 6 on page 10.
10	Footnote 5 Table-last row	The effective date for the 0.02 mg/l phosphorus limit was modified to be consistent with the effective ACJ.
11	Outfall 002	A revised limit for fecal coliform is proposed. Monitoring is now proposed for phosphorus and ammonia.
	Footnote 8	Added to define "bypass events."
12	Whole Effluent Toxicity Testing	The whole effluent toxicity testing program is included in the existing permit. The testing required has been updated to reflect current NYSDEC requirements.
16	Best Management Practice #1	The inspection and maintenance requirement was revised. The deleted portion of this BMP is required in the draft permit appendices.

24	CSO and Water Quality Monitoring	The draft permit includes new conditions to develop interim and final CSO monitoring plans and a water quality monitoring plan to assess compliance with the long term control Plan.
<u>Page</u>	<u>Item</u>	<u>Explanation</u>
25	Storm Water Pollutant Prevention Plan for POTWs with Storm Water Outfalls	The draft permit includes new conditions requiring the Permittee to develop, implement, and maintain a SWPPP.
Appendix A	Table of Contents	The Harbor Brook and Clinton Regional Treatment Facilities, along with Harbor Brook Floatable Control Facilities #2-5, were removed from this proposed permit pending decisions on the anticipated ACJ amendment under consideration at the time this proposed permit was being finalized. This permit will be modified if appropriate depending on the resultant ACJ.
A-1	Footnote	A new footnote #7 was added. The new footnote describes the analytical method for Total Chlorine Residual plus five additional analytes.
A-2, A-4, and A-10	Special Condition 2	Revised to read as follows: The permittee shall not divert to the CSO regional treatment facility unless either the peak hourly design flow or the maximum daily design flow of the treatment process cannot accept additional wastewater.
A-2 and A-4	Special Condition #7	Sampling requirement has replaced the requirement to submit Form 2-A application.
A-5	Special Conditions	The phrase "in-line netting" was replaced with "combing screen" in Special Condition #2. Special Condition #3 was removed since it is covered under CSO BMP #5 on draft permit pages 16- 17.
A-6, A-7	Special Conditions	Special condition #4 was removed. It is addressed under CSO BMP #5 on draft permit pages 16- 17.
A-8	Footnotes and Special Conditions	The phrase "at the end of every rain event or" was removed from Footnote 5. Special condition #3 was removed; it is covered under CSO BMP #5 on draft permit pages 16 - 17.
A-9	Footnote and Special Condition	Footnotes 1 and 2 and a special condition were added.

A-9	Table	Under UNITS, "Cu. yds" was replaced with "tonnage." Under SAMPLE TYPE, "Calculated" was replaced with "N/A."
A-10	Special Condition	Special condition #3 was removed since it is covered under CSO BMP #5 in the draft permit (pages 16-17).

C. PROPOSED EFFLUENT LIMITATIONS:

<u>Parameters</u>	<u>Descriptions</u>
Flow and Disinfection	As a result of the plant upgrade, the permitted flow was increased from 80.0 MGD to 84.2 MGD. Footnote #4 on page 10 was added to reflect the new Ultraviolet (UV) Disinfection System. The footnote states that: <i>"Only effluent flows up to 126.3 MGD shall be disinfected using UV and shall be used in the calculation for the monthly average flow for outfall 001. Flows from 126.3 up to 240 MGD shall receive primary treatment and will be discharged via outfall 002 with chlorination/dechlorination capacity. All influent flows greater than 240 MGD will be disinfected prior to being discharged via outfall 001 without disinfection. Disinfection will be performed on all flows between April 1 and October 15."</i>
CBOD ₅ and TSS Loading rates	Loading rates were adjusted as a result of the increased permitted flow rate.
Mercury	The proposed Interim Limit is 200 ng/L until the Department reviews results from the Mercury Minimization Plan (MMP), which is required on page 22 of the draft permit. The calculated water quality-based effluent limit for Mercury is 0.7 ng/l. However, available information indicates this concentration is not achievable by this or any other POTW. Therefore, best professional judgment (BPJ) was used to determine an interim limit of 200 ng/L. Working toward further reduction, the goal of the MMP is to attain a 50 ng/L final effluent limit. Because the effluent limit being specified is higher than the calculated WQBEL, a Mercury Minimization Program (MMP) requirement is proposed in the permit. The MMP requires the permittee to make continued progress toward the water quality goal. The permittee has routinely monitored for mercury using EPA Method 245.1 (or 245.2) and consistently reported non-detect effluent concentrations at an analytical Method Detection Limit (MDL) of 200 ng/L. As part of this permit modification, the permittee will be required to perform all future mercury monitoring using EPA Method 1631 which has a 0.2 ng/L MDL. An effluent mercury database will be developed which, in conjunction with the MMP, will be used to evaluate a new mercury effluent limit in the future.

<u>Parameters</u>	<u>Descriptions</u>
Methylene Chloride	<p>Metro's Discharge Monitoring Reports (DMRs) were reviewed for a three-year period (December 2005 – December 2008). Data show that Metro had a maximum load of 0.86 pounds per day (lbs/d) for methylene chloride. The load was incorporated into the permit as Metro's action level. This load results in a discharge well below levels that result in compliance with water quality standards. Note 2 on page 7 of the draft permit requires additional evaluation if the action levels are exceeded. The water quality standard (0.2 mg/l) results in a load of 281 lbs/d.</p> $\{(0.2\text{mg/l})(84.2\text{MGD})(2)(8.34) = 281\text{ lbs/d.}\}$ <p>This assumes a dilution factor of 2 and uses the conversion factor of 8.34.</p>
Nickel	<p>The 28.0 lbs/d action level is proposed based on the daily maximum for a three-year period based on review of Metro's DMRs from December 2005 to December 2008. The aquatic-based water quality standard (0.15 mg/l) would result in a 210 lbs/d load at a discharge flow rate of 84.2 MGD. Given the removal capabilities at Metro, the lower action level of 28.0 lbs/d is proposed for the permit.</p>
Iron	<p>NYSDEC has proposed guidance of 1.0 mg/l for aquatic life protection. This equates to 1404 lbs/d at a flow rate of 84.2 MGD. Effluent data from Metro indicate total iron discharge can reach 5260 lbs/d. An interim limit of 5260 lbs/d is proposed pending the implementation of a toxicity testing, source track down and ambient monitoring program listed on pages 10 and 23 of the proposed permit. The goal of the monitoring and testing is to reduce the iron load to guidance values.</p>
Chromium	<p>The 16 lbs/d action level is based on a daily maximum for a three-year period based on review of Metro's Discharge Monitoring Reports. The aquatic-based water quality standard is 0.21 mg/l which equates to a load of 295 lbs/d at a discharge flow rate of 84.2 MGD. The lower action level load is proposed for the permit.</p>
Butyl Benzyl Phthalate	<p>The 3.0 lbs/d action level is based on a daily maximum for a three-year period based on review of Metro's Discharge Monitoring Reports. There is no applicable water quality standard. An action level was calculated for this compound because it was detected in Metro's effluent.</p>
Tetra-chloroethene	<p>An action level of 1.1 lbs/d is proposed in the draft permit. This action level is based on a daily maximum for a three-year period based on review of Metro's Discharge Monitoring Reports. Note 2 on page 7 of the draft permit requires additional evaluation if the action level is exceeded. The water quality standard is 0.001 mg/l which equates to a load of 1.4 lbs/d at a discharge flow rate of 84.2 MGD. The lower action level load is proposed for the permit.</p>

<u>Parameters</u>	<u>Descriptions</u>
Cyanide	The water quality standard for cyanide is 0.0052 mg/l. This equates to a calculated water quality-based effluent limit (WQBEL) of 7.3 lbs/d based on a discharge flow rate from Metro of 84.2 MGD. Review of three years of Metro's Discharge Monitoring Reports shows a maximum effluent discharge of 13 lbs/d. An interim limit of 13 lbs/d is proposed pending implementation of a toxicity testing, source track down and ambient monitoring program listed on pages 10 and 23 of the proposed permit. The goal of the monitoring and testing is to bring the County into compliance with the WQBEL of 7.3 lbs/d through source identification and reduction of this parameter.
Phenols	The water quality standard for phenols is 0.001 mg/l. This equates to a calculated water quality-based effluent limit (WQBEL) of 1.4 lbs/d. Review of Metro's Discharge Monitoring Reports over a three-year period shows a maximum effluent discharge of 9.7 lbs/d. An interim limit of 9.7 lbs/d is proposed pending the implementation of a toxicity testing, source track down and ambient monitoring program listed on pages 10 and 23 of the proposed permit. The goal of the monitoring and testing is to bring the County into compliance with the WQBEL of 1.4 lbs/d through source identification and reduction of this parameter.
Chloroform	The 0.91 lbs/d action level is based on a daily maximum for a three-year period based on review of Metro's Discharge Monitoring Reports. There is no applicable water quality standard for chloroform.
Copper	The 17.6 lbs/d action level was used based on a daily maximum for a three-year period based on review of Metro's Discharge Monitoring Reports. The water quality standard for copper is 0.026 mg/l which would result in a loading from Metro of 36.6 lbs/d at a discharge flow rate of 84.2 MGD. The lower action level load is proposed for the permit.

D. COMBINED SEWER OVERFLOWS :

1. Best Management Practices

Pages 16-18 of the draft permit propose 15 Best Management Practices for the CSOs within the Metro service area. The effective permit contains 13 BMPs. Primarily, the two additional BMPs require characterization and monitoring and annual reporting for the CSO system. In addition, modifications to BMPs include:

BMP#5: A statement was included requiring the submission of a revised wet weather operating plan whenever there is a modification to the facility and/or the sewer system.

BMP #9: The reference to Water Environment Federation Manual of Practice was replaced with the 1999 edition entitled: Prevention and Control of Sewer System Overflows, 2nd Edition.

BMP#12: The requirement for this BMP was replaced and will now read as follows:

It is recommended that the impacts of run-off from development and re-development in areas served by combined sewers be reduced by requiring compliance with the New York Standards for Erosion and Sediment Control (<http://www.dec.ny.gov/chemical/29066.html>) and the quantity control requirements included in the New York State Stormwater Management Design Manual (<http://www.dec.ny.gov/chemical/29072.html>).

2. Long-term Control (LTCP)

The CSO LTCP was included in the permit, in accordance with the 2000 Wet Weather Quality Act and EPA's 1994 National CSO Control Policy. The NYSDEC recognizes that a significant portion of the LTCP elements was addressed in the Amended Consent Judgment (ACJ) and is currently being implemented. The CSO Control Policy requires permittees to submit progress reports describing the implementation of each of the LTCP components. However, the monthly progress report required under the ACJ will supersede the progress report on the LTCP until December 31, 2012. The ACJ meets EPA Policy and functions as the LTCP for the Metro sewer shed.

E. SANITARY SEWER OVERFLOWS

Page 21 of the proposed permit includes nine new best management practices for sanitary sewer systems with active overflows.

The following SSO outfalls have been added to the permit:

Outfall No.	Description	Latitude/Longitude	Receiving Water
086	Town of Salina- Manhole @ Toas Ave. and Young Ave.	N 43° 05.56/W 076° 08.59'	Ley Creek
087	Town of Salina- Manhole @ Garden City Drive	N 43° 05.27/W 07° W 09.74'	Ley Creek
088	OCDWEP- Westside Trunk Sewer @ Bronson Road	N 42° 02.80/W 076° 13.11'	Geddes Brook
089	OCDWEP - Westside Pump station	N 43° 04.30/W 076° 12.28'	Onondaga Lake
090	OCDWEP - Floradale Road Manhole	N 43° 06.15/W 076° 11.88'	West Branch of Bloody Brook
091	OCDWEP - Ley Creek Pump Station	N 43° 05.27/W 076° 09.74'	Ley Creek
092	OCDWEP - Viking Place Manhole	N 43° 05.99/W 076° 11.61'	West Branch of Bloody Brook
093	OCDWEP - Electronics Park Trunk Sewer Manhole	N 43° 05.91/W 076° 11.49'	East Branch of Bloody Brook

F. SEWER SEPARATION:

Sewers that are currently identified to be separated in accordance with the ACJ are now listed on page 6 of the draft permit. This page also includes outfalls 041 and 047 which were not listed in the Amended Consent Judgment but have been scheduled for sewer separation.

G. COMPLIANCE SCHEDULE:

The NYSDEC understands the Schedule of Compliance for mercury minimization on page 22 of the existing permit has been met. Therefore, the schedule was removed from the permit. However, a schedule for a Mercury Minimization Plan (MMP) was added to the proposed permit. The MMP requires the permittee to examine voluntary source reductions (domestic and non-domestic sources), product substitutions, and other pollutant minimization programs to reduce the pollutant loading to the system, including but not limited to the following examples: household hazardous waste collection, dental and photo processing Best Management Practices, sewer user notification of consequences of disposing toxic substances to the sewer system, and other pollution prevention methods.

H. OTHER CHANGES TO THE PERMIT:

1. Updated permit pages were used, including a page titled: Permit Limits, Levels and Monitoring Definitions. The monitoring page contains an updated diagram of the facility showing locations of sampling points.
2. Footnotes were reorganized.
3. The address for the Bureau of Water Compliance on the Recording, Reporting and Monitoring page has been changed.
4. On Page 27, the Discharge Notification Act condition was modified to include maintenance requirements.
5. References to General Conditions were replaced with 6 NYC RR Part 750.
6. New outfall numbers 084 and 085 were assigned to Ley Creek Pump and Liverpool Pump Stations, respectively.
7. A Table of Contents was added.
8. On the cover page, the permittee name was changed to Onondaga County Department of Water Environment Protection. The new commissioner's name, Tom Rhoads, P.E., was added.

IV. PUBLIC COMMENT PERIOD:

The Department proposes a 5-year permit modification. Many suggested changes were made and an extensive responsiveness summary was prepared. Additionally, NYSDEC met with several of the commenters to better understand questions, comments, and suggested changes. Comments on the proposed permit should be sent to Ms. Elizabeth Tracy, NYSDEC, 615 Erie Boulevard West, Syracuse, NY 13204-2400. The public comment period is scheduled to end January 28, 2012 or 45 days after the publication date of the notice, whichever is later.

RESPONSIVENESS SUMMARY TO COMMENTS
METRO WASTEWATER TREATMENT PLANT
SPDES PERMIT # NY0027081 DEC ID#7-3115-00113/00001

Great Lakes

Comment #1: Phosphorus – Excess phosphorus pollution can lead to algal blooms in lakes. The permit includes a .10 mg/l limit using a 12-month rolling average and reduction to .02 mg/l after 2015. Why not include corresponding monthly P concentration limits? Also, why not include an interim P limit that would be reached between 2012 and 2015?

Response: The current and draft permits require monthly monitoring for phosphorus. As immortalized in the Amended Consent Judgment (ACJ), Onondaga County (“County”) and the New York State Department of Conservation (DEC) have agreed that the monthly rolling average is the most appropriate means at this time to measure phosphorus in the Metro effluent pending the on-going total maximum daily load (TMDL) study of phosphorus in Onondaga Lake. Phosphorus monitoring and the permit limitation for Metro may be re-evaluated following the conclusion of this study. In the meantime, the County is engaged in operational practices to optimize and reduce phosphorus concentrations, as per the requirements of the ACJ. An interim limit for phosphorus was not considered, as Onondaga Lake is, on average, in compliance now.

Comment #2: E. coli - E. coli has been shown to be a better predictor of the potential for impacts to human health from exposure to wastewater effluent and surface waters which contain wastewater effluent than fecal coliform. The permit includes limits for fecal coliform. Why not include monitoring and limits for E. coli also?

Response: New York State currently has no water quality standard for E. coli; therefore, no permit limit is applicable at this time. The permittee is currently sampling for total coliform and fecal coliform. The New York State Department of Health has jurisdiction over regulating bathing beaches.

Comment #3: CSO reporting – An annual report for CSO BMP implementation is required in item 15 on page 18. Annual reports are also required on page 24. Why not require these reports to be made available to the public by posting online? Such reporting should include reports of the total volume of CSOs.

Response: The first requirement of the Best Management Practices (draft permit page 21) covers the reporting requirement. We believe the County is striving to make sampling information and results available on its website whenever possible. DEC is currently working on a system that will also make this available on its website. Until then, feel free to contact the county for any information you may need concerning this report. You may also ask the County for this information under the Freedom of Information (FOIL) Act, if necessary.

Comment #4: Green infrastructure – EPA encourages the use of green infrastructure approaches to reduce stormwater inflow and CSOs. See the August 16, 2007 Memo from Linda Boornazian (Water Permits) and Mark Pollins (Water Enforcement) to Regions and States: "Use of Green Infrastructure in NPDES Permits and Enforcement" ("In developing permit requirements, permitting authorities may structure their permits, as well as guidance or criteria for stormwater plans and CSO long-term control plans, to encourage permittees to utilize green infrastructure approaches, where appropriate, in

lieu of or in addition to more traditional controls." Unfortunately, the draft permit does not appear to include any green infrastructure requirements. Why not include requirements for green infrastructure in this permit?

Response: Detailed plans and an implementation schedule for Green Infrastructure are available in the 4th Stipulation of the ACJ.

Comment #5: Chromium-6: In 2010, EPA announced that it is likely that EPA will tighten drinking water standards to address the health risks posed by chromium-6. The draft permit includes monitoring for total chromium. Why not include specific monitoring and reporting of chromium-6 levels?

Response: Please be aware that there is neither an EPA nor DEC water quality standard for this parameter. However, current and draft permits already contain a requirement for Total Chromium which measures both chromium-3 and hexavalent chromium (chromium-6). The City of Syracuse and surrounding communities obtain drinking water from Skaneateles Lake and Lake Ontario. Effluent from Metro does not discharge in proximity of these, or any other, sources of drinking water.

Comment #6: Mercury – The fact sheet (page 4) states that the permit includes an interim limit of 200 ng/l, yet the permit itself (footnote 8) says "The Interim Limit is 68 ng/l based upon existing effluent quality." Which is the correct interim limit? Even the enforceable limit of 50 ng/l is much higher than the water quality-based effluent limit for mercury of 0.7 ng/l. Greater progress to reduce mercury should be required. Shouldn't a much lower mercury limit be required? Also, the fact sheet (page 4) states that "An effluent mercury database will be developed which, in conjunction with the MMP, will be used to evaluate a new mercury effluent limit in the future." However, no date is set in the permit for when the new mercury effluent limit will be set or for completion of the database. The permit should provide a certain date for completion of the database and setting the new mercury limit.

Response: Thank you for letting us know about the error in the fact sheet. We share your concern and the need to reduce mercury in wastewater discharges. This is why the draft permit contains a mercury minimization program (MMP) the County must implement. The requirements for the MMP can be found on page 22. The requirement for completion of a database is not specific to the Metro permit alone. DEC is monitoring permits across the state. A specific date for establishing a state-wide database may be announced when the majority of data has been gathered.

RockTenn:

Comment #1: Section III -The draft permit indicates that the interim limit for Total Phenol would be a daily average of 9.7 lbs/day as compared to the current limit of 34 lbs/day. The Fact Sheet for the proposed draft permit indicates that the interim limit of 9.7 lbs/day was selected since it represented the maximum effluent load from the OCDWEP over a three year period. However, a review of the phenol data provided by the County for 2011 indicates that the annual average effluent mass phenol loading was 9.3 lbs/day with a maximum of 32.6 lbs/day. If the draft permit limit of 9.7 lbs/day were in effect in 2011 it would have resulted in a significant number of violations. Interim limits are supposed to reflect achievable limits for the facility. Therefore, it is recommended that the current phenol limit of 34lbs/day be maintained until the investigation and implementation of a phenol reduction plan is complete.

Response: Spikes in phenol loadings significantly inhibit the microbiology in Metro's activated sludge, jeopardizing wastewater treatment. DEC has carefully performed a statistical analysis of

the data and has determined that Metro's treatment system is able to consistently achieve a limit of 9.7 lbs/day. Any limit lower than that would not protect the health and water quality of Onondaga Lake. Please work with the County to best assist it in achieving this level of treatment.

Comment #2: X.B.1 - The schedule contained in the draft permit allows six months for the development of a plan for identification, evaluation, prioritization and control strategy to bring the permittee into compliance. It allows 60 days after the approval of the plan for implementation of the plan and requires full compliance within 2 years of the plan approval. It is not likely that we could achieve implementation of the approved plan within 60 days. It would not be possible to identify sources, conduct an evaluation of control approaches and develop a control strategy in a 2 month period. The final compliance schedule is also unrealistic in that individual dischargers to the County will have to implement treatment components or treatment will have to be implemented at the County WWTP. Treatment for the removal of phenol to the levels required will be very complex and expensive and will likely require significant additional time to study, design, fund, and implement the selected option than is currently provided in the permit. We request that the SPDES permit reflect a more realistic schedule of four years from plan approval for ultimate compliance.

Response: The preceding response is also applicable. Furthermore, Onondaga County has agreed to meet the loading requirement indicated in the draft permit. DEC suggests that Rock Tenn work closely with the County to address any concern it may have under its pretreatment agreement and permit with the County.

Comment #3: Section III - The permit also requires the County to comply with a phosphorus (P) limit of 0.02 mg/L by the end of December 2015. Until then, an interim limit of 0.1 mg/L will apply. This limit appears to have been in effect since Nov 16, 2010. Compliance with 0.02 mg/L total P limit will be extremely difficult if not impossible. A literature review conducted as part of the evaluation of nutrient removal in Florida indicates that total phosphorus of less than 0.1 mg/L may be achievable, however, extensive pilot testing would be required to assess the viability of current technology to achieve a total phosphorus limit of less than 0.1 mg/L. The review also indicated that very high levels of chemical dosages would be required to achieve levels in the 0.1 mg/L level. The ability to consistently achieve a concentration of 0.02 mg/L is unproven at this point and the permit must provide some relief until it can be proven that technology can be implemented to achieve such a low limit.

Response: DEC and Onondaga County have undertaken extensive scientific studies and hydraulic modeling to evaluate the appropriate phosphorus limit for the Metro effluent permit. Under the ACJ, the County agreed to the conditions of this limit upon signing the document prior to its execution and issue. A final phosphorus limit will be set by the DEC with regard to the conclusions of the TMDL study. This will be made public as soon as the study is completed.

USEPA Region 2

On December 9, 2011 the New York State Department of Environmental Conservation provided notice of the draft State Pollutant Discharge Elimination System (SPDES) permit (SPDES No. NY0027081) for the Metropolitan Syracuse WWTP. The facility is classified as a major discharger and discharges 10 Onondaga Lake. In accordance with 40 C.F.R. § 123.44, the U.S. Environmental Protection Agency has reviewed the draft permit and provides the following comments for your consideration as NYSDEC develops the final permit. These comments must be satisfactorily addressed in order to eliminate the potential for permit objection pursuant to the 1975 Memorandum of Agreement between the EPA and NYSDEC and to 40 C.F.R. § 123.44.

Comment #1: Bacteria Criteria. 40 C.F.R. § 131.41 establishes ambient water quality criteria for

freshwaters of New York State using E. coli. The 2008 Regional National Pollutant Discharge Elimination System (NPDES) Program Review for the EPA Region 2, dated January 23, 2011, included the appropriate application of E. coli and Enterococcus bacteria standards as a follow-up item. The report recommended the following actions to improve implementation of pathogen limits in permits:

- a. New York should implement all applicable pathogen requirements (including 40 C.F.R. § 131.41) in accordance with 40 C.F.R. § 122A4(d)(1) and §303 of the Clean Water Act
- b. New York should document in permit sheets the appropriate application of their pathogen standards.

The appropriate and timely implementation of the ambient water quality criteria under 40 C.F.R. § 131.41 is under discussion between the EPA and NYSDEC. While these discussions are underway, at a minimum, please ensure that the Metropolitan Syracuse WWTP permit contains a requirement for routine E.coli monitoring and reporting.

Response: Thank you for your comments. As you rightly referenced, DEC will implement any policy agreement between EPA and DEC once this discussion between the parties has concluded.

Comment #2: General Conditions. In accordance with 40 C.F.R. § 122.41, all conditions applicable to NPDES permits and corresponding State programs shall be incorporated into the permits either expressly or by reference. If incorporated by reference, a specific citation to these regulations (the corresponding State regulations) must be given in the permit with a notation specifying that it is incorporated by reference and is an enforceable requirement of the permit. NYSDEC must ensure that all of the required conditions in 40 C.F.R. § 122.41 are addressed in the NPDES permit. 40 C.F.R. § 122.42 contains additional conditions applicable to specified categories of NPDES permits, including conditions for Publicly Owned Treatment Works (POTWs), such as the Metropolitan Syracuse WWTP. Additionally, the permit must specify that the permittee must comply with all aspects of the State water quality standards.

In Section XIV Recording, Reporting and Additional Monitoring Requirements of the draft permit, there is a reference to 6 NYCRR Part 750. However, 6 NYCRR Part 750 does not explicitly require the permittee to comply with any conditions.

Furthermore, in accordance with 40 C.F.R. § 122.42(b) and as specifically clarified in the EPA's "Natural Gas Drilling in the Marcellus Shale NPDES Program Frequently Asked Questions" dated March 16, 2011, permits must include conditions that "all POTWs must provide adequate notice to the Director [EPA and/or the state NPDES permitting/pretreatment authority] of the following:

- (1) Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301.306 of CWS if it were directly discharging those pollutants; and
- (2) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants to the POTW at the time of issuance of the permit.
- (3) For purposes of this paragraph, adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity and quality of effluent to be discharged from the POTW."

Under 40 C.F.R. § 122.2, "Director" means the Regional Administrator or the State Director, as the context requires, or an authorized representative. When there is no "approved State program" and there is an EPA administered program, "Director" means the Regional Administrator. Where a State does not

have an approved State pretreatment program, the Regional Administrator is the Director of the pretreatment program under this provision. In cases such as New York, where the state is the permitting authority and the EPA is the approval authority for pretreatment, the POTW must submit the required information to both agencies. "Adequate notice" is meant to provide the state permitting authority with enough time to determine if the POTW SPDES permit needs to be modified in order to address the potential effect due to the potential new indirect discharger. Therefore, the draft permit must be modified to include the language provided by the EPA (see below for "Recommended language to include in the permit") since the draft permit does not meet the requirements of 40 C.F.R. § 122.41 and [22.42. Recommended language to include in the permit:

(a) The permittee shall comply with all conditions set forth in this permit and with 6 NYCRR Part 750 concerning additional monitoring and reporting requirements and conditions, including noncompliance reporting. 6 NYCRR Part 750 is hereby incorporated by reference and its conditions are enforceable requirements of this permit.

(b) The permittee must provide adequate notice to the NYSDEC and the EPA of the following:

(1) Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of the Clean Water Act if it were directly discharging those pollutants; and

(2) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

(3) For purposes of this paragraph, adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

(c) The permittee shall comply with all applicable State Water Quality Standards in accordance with NY Environmental Law § 17-0811.

Response: Comment noted and appreciated. DEC will modify the permit when that time comes.

Comment #3: Fact Sheet. We note that the fact sheet is deficient in providing sufficient information to meet all of the requirements of 40 CFR 124.8 and 124.56. Specifically, fact sheets should include: a more detailed characterization of the receiving water, including its general health, background concentrations, impairments, and application of TMDLs, if appropriate; a more detailed discussion on the determination of pollutants of concern for analysis; calculations used to determine reasonable potential for water quality-based effluent limits; and calculations establishing the final limits. The permitting authority should document in the fact sheet whether a facility causes or contributes to a relevant impairment.

Please note this for future fact sheet development and provide the deficient information as noted above.

Response: Thank you, comment noted.

Comment #4: Phosphorus Compliance Schedule. The EPA Region 2 is in receipt by copy of a December 14, 2011 letter from Norman Spiegel, State Assistant Attorney General to Luis A. Mendez, Senior County Attorney providing written notification pursuant to Paragraph 24 of the Amended Consent Judgment. NYSDEC thereby extended by 6 months the County's requirement to demonstrate that the Metro WWTP could comply with the 0.02 mg/L final

SPDES permit limit for phosphorus. The date was extended from December 31, 2011 to June 30, 2012. Furthermore, the letter indicates it is possible that the compliance date for Metro to comply with the final 0.02 mg/L limit, or, divert discharge out of the Lake to Seneca River or implement another engineering alternative, may be extended by 6 months from the December 31, 2015 deadline by discretionary authority of NYSDEC under Paragraph 24 of the ACJ in consultation with the EPA. NYSDEC has stated that the 6 month extension is needed to accommodate the revised phosphorus TMDL development schedule.

Page 10, footnote 5 should be revised to be clear and consistent with these current ACJ and TMDL developments concerning the final SPDES permit limit for phosphorus at Metro WWTP. Suggested language:

EFFECTIVE DATE

PHOSPHORUS

December 31, 2015* Final limit = 0.02 mg/l
12-month rolling average, or, as adopted by NYSDEC
supported by a revised phosphorus TMDL for Onondaga
Lake

"This final date may be revised pursuant to the terms of the ACJ but by no later than July 1, 2016. Additionally, the phased limitation for phosphorus in the Metro WWTP is a compliance schedule. As described in the May 10, 2007 memo from James Hanlon of EPA's Office of Wastewater Management to Alexis Strauss, Director of EPA Region 9's Water Division (copy enclosed) and 40 CFR 122.47(a)(3), compliance schedules that are longer than one year in duration must set forth interim requirements and dates for their achievement. If the time necessary for completion of any interim requirement is more than one year and is not readily divisible into stages for completions, the permit must specify the interim dates for reports of progress toward completion of the interim requirements and indicate a projected completion date. The permit must require that progress reports be submitted no later than 14 days following each interim date and the final date of compliance in accordance with 40 C.F.R. § 122.47(a)(4). 40 C.F.R. § 122.47 includes the requirements for compliance schedules including time for compliance, interim dates, reporting, etc. NYSDEC must modify the permit to ensure that all permit requirements comply with the compliance schedule interim limit, schedule and reporting requirements of 40 C.F.R. § 122.47. The EPA looks forward to working with NYSDEC to resolve the issues identified above. To ensure that these matters are resolved to the satisfaction of the EPA, we request that a proposed permit, as defined in 40 C.F.R. § 122.2, be submitted to the EPA prior to final issuance of the permit for the Metropolitan Syracuse WWTP in accordance with 40 C.F.R. § 123.44.

Response: The letter (dated December 14, 2011) to which EPA refers in this comment is in regard to Paragraph 24 of the Fourth Stipulation and Order of the ACJ, entered by the Court on November 16, 2009. This provides DEC with the right to exercise its discretionary authority to extend the County's deadline – for an additional six months – by which it must demonstrate its ability to meet the phosphorus effluent limit set in Paragraph 9 of the ACJ, entered by the Court on January 20, 1998. This does not, however, extend the date by which the County must meet the 0.02 µg P per liter of effluent to comply with water quality standards. This remains December 31, 2015, unless otherwise determined by the Department at the conclusion of the processes to determine the TMDL of phosphorus for Onondaga Lake.