

NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

Division of Water, Region 7

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May 26, 2015

Mr. Tom Rhoads, P.E., Commissioner
Onondaga County Department Water Environment Protection
650 Hiawatha Blvd., West
Syracuse, NY 13204-1194

**Re: Oak Orchard WWTP — Submittal for Conditional Approval for Re-Rate of BOD,
dated March 9, 2015**

Dear Commissioner Rhoads:

The New York State Department of Environmental Conservation (“Department”) reviewed the above referenced document for conditional approval. In our letter dated January 8, 2015, DOW Region 7 requested that the Onondaga County Department of Water Environmental Protection (“County”) submit for our assessment, four informational items in order to consider conditionally approving the re-rating of influent BOD loadings at the Oak Orchard WWTP, as requested by the County. Currently, the Oak Orchard WWTP is designed to treat 14,200 lb/day of influent BOD. Anticipating expanded development of its service area, the County has asked that the Department increase its influent BOD allowance to 17,100 lb/day.

Upon review of the submittal received on March 6, 2015, we find that the County has satisfied two of the four requested RFI items: 1) by providing an internal sampling plan and schedule for process control; and, 2) by providing the current feed dosage rate for polymer and chlorine and verifying the storage capacities.

However, we find that additional information will be required for items #3 and #4.

- 3) Long-term plan to increase process capacity at the treatment facility, and;**
- 4) Projected growth plan – impact from largest industrial user.**

The response lacks a formal plan to address growth along with actual data showing future projections or impacts. As a planning tool, an estimated date upon when the self-imposed 90% threshold is anticipated must be included. Based on this estimated date, a schedule implementing appropriate upgrades must be included. Based on the County’s own predications, it may take up to 10 years to implement and complete construction of certain upgrades. Additionally, the response did not address the proportional impact of each commercial, industrial, and residential sector on the service area, including the largest industrial user, Clinton’s Ditch. Lastly, previous engineering reports commissioned by the County have outlined current weaknesses of the facility. Taking an asset management approach, incorporate

maintenance, equipment replacement, and expansion as part of this long-term plan. The plan is dynamic, and if the future shows that growth does not occur at the expected rate or the large industrial users have reduced their organic loadings, then the plan can be adjusted to reflect those changes.

Please address the requested items above so we may continue to consider the conditional approval for the re-rating of influent BOD.

Sincerely,

A handwritten signature in black ink, appearing to read 'Timothy DiGiulio', with a long horizontal flourish extending to the right.

Timothy DiGiulio, P.E.
Regional Water Engineer

ec: Valarie D Ellis, P.E. NYSDEC – Region 7
Robert Wither, P.E., BWCP, NYSDEC – Albany