



COUNTY OF ERIE

MARK C. POLONCARZ

COUNTY EXECUTIVE
DEPARTMENT OF ENVIRONMENT & PLANNING

THOMAS J. DEARING
COMMISSIONER

JOSEPH L. FIEGL, P.E.
DEPUTY COMMISSIONER

April 29, 2016

Jeffrey A. Konsella, P.E.
New York Department of Environmental Conservation (NYSDEC)
Regional Water Engineer, Region 9
270 Michigan Avenue
Buffalo, New York 14203-2999

Re: State Pollutant Discharge Elimination System (SPDES) Permit NY0022136
Lackawanna Wastewater Treatment Plant (WWTP)
SPDES Permit Schedule of Compliance
No Feasible Alternative Analysis and Permit Compliance Evaluation

Dear Mr. Konsella:

In accordance with the schedule of compliance listed in SPDES Permit NY0022136, the Erie County Division of Sewerage Management (ECDSM) is pleased to submit the "No Feasible Alternative Analysis and Permit Compliance Evaluation" for the Lackawanna WWTP. This report details the ECDSM's plans to address the following compliance actions:

- No Feasible Alternative Analysis
- Percent Removal Requirements for TSS and BOD5
- Ammonia Nitrogen Study
- Total Residual Chlorine Study

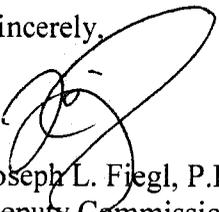
The studies/reports for these compliance actions are all due May 1, 2016, pursuant to the NYSDEC's approved schedule modification from July 2015. Further, within the July 2015 modification, the NYSDEC approved the combination of all outstanding studies into a single comprehensive report.

Per the United States Environmental Protection Agency guidance for no feasible alternative analyses, this report includes a financial capability analysis (FCA). The FCA completed for this regulatory program documents that the SPDES permit requirements add a substantial burden to the already economically challenged ratepayers of Erie County Sewer District No. 6. As a result, the "No Feasible Alternative Analysis and Permit Compliance Evaluation" provides a stepped approach to addressing the Lackawanna WWTP SPDES requirements, considering the impacts to water quality and the economic reality within the City of Lackawanna. The final approach will be predicated upon the completion of a responsible evaluation of the option of infiltration/inflow removal to address certain regulatory considerations.

Item
6(e)

The ECDSM will be contacting you to schedule a meeting to provide a high level overview of the report findings. In the interim, if you have any questions, please contact me at (716) 858-7537. Thank you for your consideration.

Sincerely,



Joseph L. Fiegl, P.E.
Deputy Commissioner

Encl.

Cc: Erie County Sewer District No. 6 Board of Managers
Bureau of Water Permits – NYSDEC Albany
D. Judd – NYSDEC Region 9
M. Quinn – GHD
G. Absolom/K. Kaminski
J. Carr/D. Millar/M. Salah/6.2.3.SPDES Sanitary