# COUNTY OF ERIE

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July 30, 2015

Sewage Pollution Right to Know Law Comments
New York State Department of Environmental Conservation (NYSDEC) – Division of Water
625 Broadway – 4th Floor
Albany, New York 12233-3500

**Re:** Sewage Pollution Right to Know (SPRTK) Act
Proposed Rulemaking to 6 NYCRR Parts 750 and 621

**COMMENTS SENT VIA E-MAIL TO:**
**sprtkcomments@dec.ny.gov**

To Whom It May Concern,

The Erie County Department of Environment and Planning – Division of Sewerage Management ("County" or "ECDSM") is pleased to submit the following comments on the proposed rulemaking to 6 NYCRR Parts 750 and 621, intended to implement the requirements of the SPRTK Act. Enclosed is a copy of a correspondence developed by the New York Water Environment Association (NYWEA) regarding this proposed rulemaking. The ECDSM endorses the viewpoints presented by NYWEA in their letter as it strikes the necessary balance between meaningful notifications – for which the County supports – and other practical concerns of municipal stakeholders that were ultimately incorporated into the final SPRTK Act approved by the State Legislature. The comments presented herein provide additional information to support NYWEA's letter.

<u>NYWEA Comment #1 – regarding the definition of a "discharge"</u>
The ECDSM agrees that additional clarification is required regarding the definition of a "discharge". In the interim period where the NY-Alert system for discharge notifications has been 'live' but the regulations have not yet been promulgated, there have been a few instances in which it was unclear whether a notification is required or not. For example, there was a small spill to ground that occurred at the County's Big Sister Creek Wastewater Treatment Plant in July 2015 during routine operation of the facility's grit system. The spill was quickly contained and never reached a storm sewer or a water body; however, erring on the side of caution a NY-Alert notification was issued. This type of notification is not particularly useful as there was no threat to public health. Additional written guidance from the NYSDEC would assist municipalities in making a proper determination of whether certain types of spills or overflows require notifications.


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NYWEA Comment #2 –requesting clarification on publicly owned sewer system (POSS) registrations
Based on discussions with the NYSDEC at a public hearing held on July 15, 2015 regarding the proposed rulemaking, it appears that POSS registrations in lieu of SPDES permits is the NYSDEC's intent. The ECDSM agrees that it would be helpful to have formal confirmation.

NYWEA Comment #3 – concerning proposed POSS requirements
Portions of several Erie County Sewer Districts would be defined as a POSS pursuant to this rulemaking. These systems are administered by the ECDSM and are subject to the same internal requirements as the County owned collection systems tributary to ECDSM publicly owned treatment works (POTWs). As a result, the County's systems that are referred to as POSSs are subject to infiltration/inflow identification and removal programs, asset management protocols, recordkeeping and tracking through the County's computerized maintenance management system (CMMS), geographic information system (GIS) mapping, etc. The County believes that it "properly operate[s] and maintain[s] the POSS" (as required in new §750-1.22(c)) and keeps sufficient records such that "documents relating to operation and maintenance of the POSS" are preserved (as required in new §750-1.22(g)); however, as NYWEA notes new §750-1.22(c) and §750-1.22(g) are open to wide interpretation.

It is speculated that the NYSDEC's intent with this portion of the rulemaking is to ensure POSSs perform maintenance on their systems and keep documentation stating as such, while not promulgating "one size fits all" requirements. While those are goals the ECDSM supports, an unintended consequence is that those types of terms in the proposed regulations open POSSs to potential liabilities. One person's definition of "properly operate and maintain" will differ from another. Even an item such as "written procedures for… training new operators" under new §750-1.22(c) presents uncertainties. The traditional definition of an "operator" is one that which is certified; however, a number of POSSs are maintained by collection system personnel that are well qualified for the job but do not have a New York State wastewater operator certification. These are just a few examples. The ECDSM supports NYWEA's suggestion that that §750-1.22(c) and §750-1.22(g) be deleted in their entirety or at a minimum be edited to address these and other concerns. There are likely other ways in which the NYSDEC can meet its goals without exposing the POSSs to unintended problems.

NYWEA Comment #4 – recommending elimination of the proposed daily/termination report requirements
Like NYWEA, the ECDSM is unsure why the daily/termination reports are included in the regulations as only initial notifications were required by the State Legislature pursuant to the SPRTK Act. The ECDSM supports meaningful communication between the NYSDEC and the health department for discharge events, but questions if NY-Alert is the proper forum for this information exchange (particularly the rare multi-day event). As reinforcement of NYWEA's comments on this proposed requirement, the ECDSM presents the following:

- The NYSDEC already receives "termination" information through existing §750-2.7(d) (5-day written report requirement). It is unclear why 5-day reports are necessary if termination reports will also be mandatory.
- The point NYWEA makes concerning the public potentially misperceiving termination reports is an important one. Most of the public currently uses NY-Alert for weather and traffic alerts and when a termination notification is provided, that means that the potential hazard or condition is over. That is not necessarily the case with a discharge notification.
- The ECDSM has setup successful communication protocols that appear to be more effective than the daily/termination reports proposed in the rulemaking. As just one example, the County's Southtowns

Advanced Wastewater Treatment Facility (AWTF) is directly adjacent to Woodlawn Beach State Park. The ECDSM, State, and local officials have successfully worked out meaningful dialogue parameters in the instance where there is an issue in the watershed during bathing season at the beach. This has resulted in good back-and-forth communication (if need be) and a clear understanding of what the issue is for the benefit of the public.

- The local health department or NYSDEC Region 9 has periodically contacted the ECDSM directly when it had a specific concern. There are already means of communication in place.

NYWEA Comment #5 – requesting additional clarification if the proposed daily/termination report requirements are to remain

There are practical concerns that the ECDSM would like the NYSDEC to consider relative to daily and/or termination reports if either of these proposed requirements are to remain:

- As the ECDSM's use of NY-Alert is relatively new, the County is unsure of how issuance of daily or termination notifications would work. Does the system require the same person that issued the initial notification to also issue the daily and/or termination reports? If yes, that could be problematic as the initial notifier may not be working at the time in which a daily or termination report is needed.
- Flexibility should be provided regarding the timing of daily or termination reports, acknowledging staffing constraints. NYWEA's comments relative to "midnight not be[ing] the required time" and "cleaning up and demobilization from an overflow event should be the focus" are particularly important.

NYWEA Comment #6 – pertaining to proposed combined sewer overflow (CSO) reporting

As the ECDSM does not own, operate, or maintain any CSO systems, the County has not further input on this item.

NYWEA Comment #7 – regarding notification of adjoining municipalities "that may be affected"

A reading of the plain language of the SPRTK Act demonstrates that the State Legislature only wanted municipal officials to be contacted in areas that may be affected by a discharge, presumably to ensure that meaningful notifications are provided. As presently written, the proposed regulations appear to be diverging from the State Legislature's intent.

To give an example, if the definition is strictly held to those municipalities that are "adjacent", a discharge in Erie County Sewer District No. 3 entered into NY-Alert under the Southtowns AWTF SPDES permit would require notification of all of the following municipalities:

- City of Lackawanna
- Towns of Aurora, Boston, Colden, Concord, Eden, Elma, Evans, Hamburg, North Collins, Orchard Park, and West Seneca
- Villages of Blasdell, Hamburg, and Orchard Park

The reality is that considering the topography of the area with creeks and streams flowing east to west, a small portion of the above municipalities would ever be affected by a discharge. Absent regulations providing additional guidance on this item, in December 2014 the ECDSM submitted information for eight municipalities (of the 15 listed above) through the NYSDEC's "POTW Notification Application For Sewage Pollution Right to Know Act". To be frank, for the vast majority of discharges only one or two municipalities would be potentially affected. Nevertheless, as the application covered the entire Southtowns AWTF service area, more than those that would be affected will be notified through NY-

Alert. By excluding "that may be affected" from the regulations, even more municipal officials will be contacted for a discharge that would have absolutely no impact on their Village / Town / City. This may lead to municipalities simply ignoring alerts altogether.

The ECDSM agrees with NYWEA that additional modifications to the proposed regulations are warranted to meet the State Legislature's intent. The language suggested by NYWEA appears to meet the SPRTK Act requirements.

NYWEA Comment #8 – concerning the Legislative intent on public notifications
The ECDSM believes that NYWEA articulated this point very well. The intent to limit notifications to those that present a threat to public health was memorialized in the SPRTK Act by the State Legislature. The regulations should reflect this requirement.

NYWEA Comment #9 – regarding new §750-2.7(b)(2)(iii) and CSO notifications
As the ECDSM does not own, operate, or maintain any CSO systems, the County has not further input on this item.

NYWEA Comment #11 – observing the disparity between POTWs and other SPDES dischargers
This appears to be a function of the specific language of the SPRTK Act.

NYWEA Comment #11 – providing input on the NY-Alert system and the regulatory impact statement
All of the suggestions and concerns developed by NYWEA appear to be valid.

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The ECDSM appreciates the opportunity to comment on these proposed regulations. The ECDSM also thanks the NYSDEC for the various presentations and other information exchanges it has provided since the passage of the SPRTK Act. If you have any questions regarding these comments, please contact me at (716) 858-7537 or joseph.fiegl@erie.gov.

Sincerely,

Joseph L. Fiegl, P.E.
Deputy Commissioner

Encl.

Cc: Erie County Sewer District Boards of Managers
G. Absolom/K. Kaminski
J. Carr/D. Millar/M. Salah

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**<u>July 29, 2015 NYWEA Letter</u>**
**Comments on Proposed Rulemaking to 6 NYCRR Parts 750 and 621**
**Sewage Pollution Right to Know Act**

NYWEA

**The New York Water Environment Association, Inc.**
*The Water Quality Management Professionals*
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July 29, 2015

**TRANSMITTED VIA E-MAIL TO:**
**sprtkcomments@dec.ny.gov**

Sewage Pollution Right to Know Law Comments
New York State Department of Environmental Conservation
Division of Water
625 Broadway, 4th Floor
Albany, NY 12233-3500

Re: Comments on Proposed Rulemaking to 6 NYCRR Parts 750 and 621
Sewage Pollution Right to Know Act

The New York Water Environment Association (NYWEA) is a statewide nonprofit organization of 2,500 water professionals dedicated to the preservation, protection and enhancement of New York's water resources. NYWEA represents water resource recovery utilities across the State that will be responsible with complying with the proposed changes to 6 NYCRR Parts 750 and 621.

As a key stakeholder that provided direct input in the final version of ECL Section 17-0826-a – Sewage Pollution Right to Know Act (hereinafter referred to as the "SPRTK Act", "Act", or "bill"). NYWEA's comments presented herein provide critical insight into the actual intent of the New York State Legislature when finalizing this bill. The SPRTK Act was result of Legislative staff, environmental advocacy groups, and organizations representing municipalities working together to develop a bill that was intended to provide meaningful dissemination of information concerning sewer overflows, while not saddling wastewater service providers with costly or burdensome requirements. It is critical that the Act in its entirety, which includes the requirements the Legislature believed were important to satisfy the valid concerns of all stakeholders, are properly implemented into the proposed changes to 6 NYCRR Parts 750 and 621.

Based on NYWEA's analysis of the plain language of the SPRTK Act and our involvement in the process of finalizing the bill, the proposed changes to 6 NYCRR Parts 750 and 621 require some revision to fully meet the Legislative intent. The following comments and suggested modifications will assist the New York State Department of Environmental Conservation (NYSDEC) in meeting that goal, while also providing additional input that would strengthen and clarify the proposed regulations:

<u>Comments</u>

1. Clarification is needed regarding the type of "discharges" that need to be reported pursuant to 6 NYCRR Parts 750 and 621. The first criterion is whether the discharge is in accordance with a NYSDEC plan or permit. If the answer is no, it is NYWEA's interpretation that only those discharges that reach surface waters of the State are to be reported based upon the definition under newly numbered §750-1.2(a) (28) ("Discharge means any addition of any pollutant to waters of the State through an outlet or point source."). This interpretation would meet the Legislative intent of the SPRTK Act if additional public health threat considerations are inserted into the regulations – see Comment #8.

2. Clarification is needed regarding the publically owned sewer system (POSS) registrations. Newly numbered §750-1.22 is for "SPDES registrations for publicly owned sewer systems"; however, §750-1 is specifically titled "Obtaining a SPDES Permit". Based on conversations with the NYSDEC, it is NYWEA's understanding that POSSs are only to receive registrations, not permits. Please verify/clarify this.

3. Several requirements outlined in new §750-1.22(c) appear to be misplaced in this section. Again, §750-1 pertains to "Obtaining a SPDES Permit" but §750-1 makes no mention of minimum operation / maintenance or training requirements for publically owned treatment works (POTWs). Furthermore, that which is described in §750-1.22(c) and§750-1.22(g) is open to wide interpretation. NYWEA suggests that §750-1.22(c) and§750-1.22(g) be deleted in their entirety or at a minimum be edited such that POSSs are not potentially subject to unnecessary regulatory enforcement based upon interpretation of inexplicit terms. No such requirements were specifically outlined in the SPRTK Act and hence there is no legal mandate that the NYSDEC implement §750-1.22(c) and§750-1.22(g) as presently written.

4. New §750-2.7(b)(2)(i), §750-2.7(b)(2)(ii)(a), and §750-2.7(b)(2)(ii)(b) introduce the concept of daily and termination reports for discharges reported pursuant to the SPRTK Act. NYWEA notes that no such concept was specifically mentioned in the bill and hence there is no Legislative directive placed on the NYSDEC to implement these reports as such. It is NYWEA's recommendation that the daily and termination report requirements be eliminated for the following reasons:
    a. Daily and termination reports for combined sewer overflow (CSO) systems operating pursuant to a long-term control plan will not be accurate. The SPRTK Act explicitly acknowledges that information reported shall be "to the extent knowable with existing systems and models." In anticipation of the SPRTK Act requirements, many CSO operators have completed simulations using their existing long-term control plan models that can, based upon precipitation measurements, provide a reasonable approximation of when a CSO event may start. This is sufficient for issuing initial notifications and will provide the information required in the Act. However, until the model has been run after the end of a rainstorm, it will be unknown when various CSOs stop. Providing real-time daily and termination reports is not feasible for the vast majority of CSO systems.
    b. Pursuant to existing §750-2.7(d), discharges other than CSOs are to be documented in five-day written incident reports. The termination reports proposed in new §750-2.7(b)(2) are duplicative, and place an unnecessary administrative burden on operators.
    c. The termination reports required in new §750-2.7(b)(2)(ii)(a) and §750-2.7(b)(2)(ii)(b) may lead to public misperception. The NY-Alert system will be the means to implement these proposed regulations. With the initial notification issued through NY-Alert, the individuals that receive the notification will be aware that there is a potential issue in the local waterway. When termination reports are issued for items such as traffic and extreme weather through NY-Alert, said termination reports indicate that the hazard is no longer present (i.e. for traffic alerts, the road is clear). The same cannot necessarily be said for sewer discharges, but issuing a termination report may unintentionally give that impression to the public. The public in general does not have the knowledge of the local health department or similar organizations to make an all clear determination for a waterway after an overflow event in the watershed. Therefore, at a minimum it is strongly suggested that daily / termination reports not be sent to the public.
    d. There are other means for the NYSDEC and health departments to obtain this information. It appears a major driver for the NYSDEC suggesting that daily / termination reports are needed is that there have been a limited number of instances where the NYSDEC was not provided timely updates for multi-day sewer discharges. Many municipalities and local offices of the NYSDEC / health departments have existing protocols of communication that are much more effective.

5. If daily / termination reports are to remain, there are a number of items that require clarification:
   a. At what point should daily reports be transmitted? NYWEA's suggests that a daily report be transmitted anytime the day following a discharge report. It is strongly suggested that midnight not be the required time for these reports, because staffing is generally lower at that time. Furthermore, if a discharge is discovered at 10:30 pm, the next daily report would be due before the actual NY-Alert was issued for the 4-hour notification (pursuant to new §750-2.7(b)(2)(ii)).
   b. At what point should termination reports be transmitted? It is strongly suggested that there not be rigid timeframes set forth; cleaning up and demobilization from an overflow event should be the focus.
   c. If termination reports are required, why are daily reports also mandated? By inference, if a termination report has not yet been issued, then the discharge could still be on-going.
   d. The way new §750-2.7(b)(2)(i), §750-2.7(b)(2)(ii)(a), and §750-2.7(b)(2)(ii)(b) are written, daily / termination reports will detail over and over again the date / time of discovery, the reason for the discharge, etc. This is repetitive and not meaningful after an initial notification has already been issued.
   e. If termination reports are to remain, will this substitute for 5-day written reports in existing §750-2.7(d)? Otherwise, it is suggested that the Regulatory Impact Statement for these proposed regulations should reflect this requirement under 'Duplication'.
   f. There was never a requirement that CSOs be documented in a 5-day written report as CSOs are permitted. Therefore, at a minimum, it is suggested that CSOs not be subject to daily and termination reports (see Comment #4a above).
   g. In the Regulatory Impact Statement for proposed changes to 6 NYCRR Parts 750 and 621, the 'Legislative Objective' section notes that POTWs and POSSs will "continue reporting the discharge for each day after the initial report is made until the discharge terminates" (i.e. daily and/or termination reports). This does not appear to be an appropriate 'Legislative Objective' as there is no mention of daily / termination reports in the SPRTK Act.

6. Paragraph 1.D of the SPRTK Act specifically states "a brief description of the steps being taken to contain the discharge <u>except for wet weather combined sewer overflow discharges</u>" (<u>emphasis</u> added). NYWEA recommends that new §750-2.7(b)(2)(i)(d) be revised to reflect the language the New York State Legislature intended and add the phrase "except for wet weather combined sewer overflow discharges".

7. It is NYWEA's opinion that new §750-2.7(b)(2)(ii)(a) requires modifications to fully meet the Legislative intent of the SPRTK Act. Paragraph 2 of the Act specifically states notifications shall be provided to "any adjoining municipality <u>that may be affected</u>" (<u>emphasis</u> added). When finalizing the SPRTK Act, NYWEA and other stakeholders presented Legislative staff valid concerns regarding providing meaningful health based notifications. The New York State Legislature ultimately enacted a bill that reflected these valid concerns and included terms such as "that may be affected." See Comment #8 for additional rationale on why this is important. NYWEA considers the definition used in new §750-2.7(b)(2)(ii)(a) for an adjoining municipality incomplete to satisfy the plain language of the Act. Therefore, NYWEA suggests the following changes (in ***bold/italics***):

   <u>New 750-2.7(b)(2)</u>

   (ii) Four hour notification requirements for POTWs and POSSs.

   (a) Notification to municipalities. Within four hours of discovery, owners and operators of POTWs and POSSs must notify the chief elected official, or authorized designee, of the municipality in which the discharge occurred and the chief elected official, or authorized designee, of any adjoining municipalities ***that may be affected*** of untreated or partially treated sewage discharges… … For purposes of this clause, *municipality* means

a city, town or village and *adjoining municipality that may be affected* means ~~any~~ *a* municipality that is adjacent to the municipality in which the discharge occurred *and is within the flow path of a waterway that may be adversely impacted by the discharge*.

Additionally, the Regulatory Impact Statement for proposed changes to 6 NYCRR Parts 750 and 621 does not include the "that may be affected" language and hence does not appear to fully articulate the 'Legislative Objective'.

8. It is NYWEA's opinion that new §750-2.7(b)(2)(ii)(b) requires modification to fully meet the Legislative intent of the SPRTK Act. Paragraph 4 from the SPRTK Act states the following:

> "The Department shall promulgate rules and regulations that are necessary for the implementation of this section. Such regulations as are necessary for the implementation of the public notification requirements of subdivision two of this section **shall provide only for public notification of discharges that may present a threat to public health**, considering the potential for exposure and other relevant factors. Such regulations may also include preconditions for notification of any discharge that is not subject to a permit issued under this title and does not present a threat to public health, considering the potential for exposure and other relevant factors." (**emphasis** added).

As stated previously, NYWEA and other stakeholders were part of the process finalizing the SPRTK Act and a valid concern presented by several stakeholders pertained to meaningful notifications. The concept of "crying wolf" – i.e. the concern that the general public will ultimately ignore notifications over time because discharges that are of no impact to public health continue to be reported – was discussed at great length. With the use of the term "shall" in the SPRTK Act, the Legislature made a clear mandate that the NYSDEC must develop rules that only notify the public when there is a threat to public health.

A comparison between the plain language of the SPRTK Act and the Regulatory Impact Statement for the changes to 6 NYCRR Parts 750 and 621 demonstrates a potential disconnect between the Legislative intent and the NYSDEC's interpretation. In the regulatory impact statement, the NYSDEC states a Legislative objective was that "[t]he general public must also be notified of **any** such discharges to surface water…" (**emphasis** added). Should the Legislature have wanted "any" discharge to receive public notification, it would have explicitly stated as such. To the contrary, the New York State Legislature wrote that the public notification "shall provide **only** for public notification of discharges that may present a threat to public health" (**emphasis** added) and further clarified in the bill that "preconditions" may be developed and that the "potential for exposure" may be part of these preconditions.

An example of a logical precondition would be a de minimis volume threshold. A minor discharge of minimal volume that may be quickly contained presents no adverse public impact threat. Other preconditions may include time of the year, weather conditions, or other relevant factors that local health departments use when assessing potential impacts.

For years existing §750-2.7(b) outlined that POTWs contact the local health department within two (2) hours of a discharge "that would affect bathing areas during the bathing season, shellfishing or public drinking water intakes". That long standing threshold was in place because it was determined those types of discharges may present a threat to public health and as such local authorities with expertise in this area would be made aware so that they may react as is necessary. The SPRTK Act now requires all discharges to be reported to the local department of health. Perhaps the threshold in existing §750-2.7(b) should be the criteria in which public notification is required? Regardless, NYWEA suggests that the NYSDEC

reevaluate new §750-2.7(b)(2)(ii)(b) to ensure that the Legislative intent is satisfied. NYWEA would be happy to work with the NYSDEC to meet the Legislative directive.

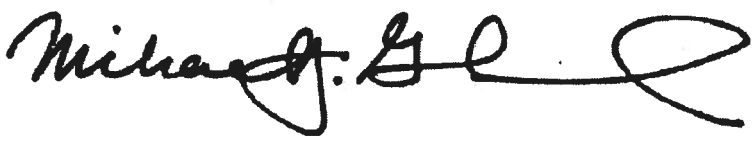
9. There are concerns for many CSO communities with respect to new §750-2.7(b)(2)(iii). Specifically, many POTW and POSS operators are not qualified to determine whether a CSO may "cause potential health concerns". Furthermore, §750-2.7(b)(2)(iii) allows for advisories to "be done on a waterbody basis rather than by individual combined sewer overflow points"; however, CSO communities are unsure how this would work with NY-Alert considering the need to enter specific location information for geographic coordinates, etc.

10. It is noted that upon implementation of the changes to 6 NYCRR Parts 750 and 621, POTWs will be held to a much higher standard than SPDES discharges from commercial entities, industries, and other sources.

11. Comments on the NY-Alert system and the Regulatory Impact Statement for the proposed changes to 6 NYCRR Parts 750 and 621 have been interspersed throughout these comments. The following provides additional input:
    a. It would be advantageous if the NYSDEC could include an automated notification update system. In practice, NY-Alert system would send out an e-mail to request that the notifier update or close the previous notification. A system like this would acknowledge that the notifiers are trying to resolve the source of the discharge and streamline the notification process so the operators can get back to fixing the problem rather than spending valuable time navigating through a notification system.
    b. The cost impact estimates for local municipalities appears to be low, particularly for CSO operators. Discrete model runs to simulate the impact of a rainstorm on a CSO system oftentimes requires consulting services which may have higher costs. Furthermore, there are some smaller facilities without internet access which will require that they incur additional costs.
    c. What will be the back-up plan for POTWs and POSSs operators to comply with the SPRTK Act should NY-Alert be inaccessible (down for maintenance, etc.) or there are local internet outages?
    d. Additional pop up information which details the exact information that should be reported in a NY-Alert entry field would be helpful for those that are unfamiliar with the NY-Alert system. In an ideal world, use of the system would be few and far between for most notifiers and hence previous training may be forgotten.
    e. Additional outreach is needed for POSSs about the NY-Alert system. NYWEA and other organizations could be a resource to assist in promulgating information.

NYWEA appreciates the opportunity to present these comments and commends its staff in their outreach activities concerning the SPRTK Act. Should you have any questions or would like to discuss these comments further, please contact NYWEA's Executive Director, Patricia Cerro-Reehil at (315) 422-7811 or pcr@nywea.org.

Sincerely,



Michael Garland, P.E.
President