

Subpart 750-2.9(c)

By Steve Grimm
Wastewater Technician, NYRWA



By Steve Grimm and An
Anonymous Editor

If you have not yet read Part 750 of 6 NYCRR, I urge you to do so. If you don't have it, contact your regional DEC office and get it. Or download it from DEC's website at: www.dec.state.ny.us/website/reg/subpart750_02.html

It's that important. "It's riveting reading" replies Rex Reed. "You won't want to put it down. A definite best seller and Pulitzer Prize candidate" touts the New York Times.

A portion of Part 750 has garnered much attention in regional DEC offices across the State. Subpart 750-2.9(c) has been the main topic of conversation during my visits to the regional offices the past few months. As a matter of fact, before I can even sit down in the DEC office, the conversation begins with "Part 750.....".

Here, to whet your appetite, is a portion of Subpart 750-2.9(c):

"Within 120 days of when the permittee determines, in accordance with paragraph 4 of this subdivision, that the annual average flow value for a calendar year to a POTW has reached or exceeded 95 percent of that POTW's design flow, the permittee shall submit to the Regional Water Engineer a flow management plan to identify and implement reductions in hydraulic loading to the POTW treatment plant."

And just like the energizer bunny, it goes on, and on, and on, and on..... So, what does this mean? Simply put, if your annual average flow reaches or exceeds 95% of your design flow, you will be required to not only submit a plan to fix it, but actually use the plan to fix it. As mentioned earlier, I have spoken with some regional DEC officials recently and have been told they will be enforcing this subpart, starting next year, so look at it now.

I know what you're thinking. This is CMOM. Well,.....no, not really. I mean, perhaps, in a way, some of it, kinda, maybe, but.....I'M SO CONFUSED!

CMOM is a rather confusing critter, and I don't want to spend a lot of time on it because I will just wind up confusing myself more. CMOM was a big part of the proposed sanitary sewer overflow rule, which was so big, cumbersome and expensive that it never got past proposed. But, most of us

would agree that we have to do something with our collection systems. Can we have fewer backups and overflows? Can we treat less groundwater and stormwater? Can we get a little less grease from the restaurants?! The collection system is connected to the plant. What happens in the collection system impacts the plant. CMOM is your collection system program. It contains some basic core documents, and then the rest of the program is up to you, to develop what you need. You already have a CMOM program! You may not have all the documents in one place, or even have all the ideas written down. But, you have an organizational chart that says who's in charge, you have a map. Do you have a sewer use law? Do you need a Sewer Overflow Response Plan that lists who calls who when, and who is allowed to talk to the press? Yikes. That list of core documents has yet to be formally required by EPA or the State. Let them worry about that. We have enough to worry about. We know what our problems are. But, do we know where they are?!


Subpart 750-2.9(c) forces us to address a problem we know we all have, I&I. It's been looked at, talked about, looked at, ignored, and looked at yet again. Now, unfortunately, it's time to do something about it. I say unfortunately because doing something about it means spending money. I find it interesting and worth mentioning that a few new phrases pop up in this, and other portions of Part 750. Those phrases are "at minimum cost" and "economically feasible". The DEC is well aware of the economic and financial difficulties of the time. It would not be in their best interest (which, ultimately, is the protection of the environment) to take a hardcore stance and demand immediate compliance and issue stiff fines. On the contrary. I think they will be willing to work with you to resolve these issues, BUT (there's always a but), you have to also be willing to work with them. You need to be proactive and get started finding your problem areas. And that doesn't have to mean spending money. Here comes the sales pitch. Collection system evaluations and inspections can be conducted in-house, using your own staff and the help of New York Rural Water.

Smoke testing is an integral first step in evaluating the condition of your collection system. It helps to identify illegal sewer connections such as roof drains, cellar drains and sump pumps, as well as, compromised house laterals, all of which won't cost the municipality any money to correct since they are on private property and the responsibility of the homeowner to correct. Smoke testing can also identify storm sewer connections and leaking manholes. Smoke testing is an effective and inexpensive way to identify a myriad of problems in the collection system. Then you can prioritize and start to plan to solve the problems and guess what? That's CMOM!

Thanks to the generosity of the Village of Saranac Lake (thanks Kevin, Robert, Village Administrator; John Sweeney, Mayor, Board, etc.), we now have a sewer camera. Now before you start ringing my phone off the hook, let me splain somethin to you Lucy. First, I need to get the camera serviced so it is sewer ready. Hopefully, by the time you read this, it will be up and running. Secondly, the camera can only be used for limited sewer inspections. It is a push type camera with about 100 feet of push rod. I won't be able to do full system inspections, leave that to the professionals. It will be used in conjunction with smoke testing to verify certain problem areas. I believe this will be a valuable addition to our technical assistance efforts.

Contrary to the title of this article, I have not spent much time on Subpart 750-2.9(c). I hope I have piqued your interest enough to pick up a copy and read it for yourself. It is important that you are aware of what's coming down the pipe (ha,ha). ♠





Arden Conference Center

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May 26, 2005

Patricia C. Scalera
Chief Executive Officer
New York Rural Water Association
P.O. Box 487
Claverack, N.Y. 12513

Re: Technical Assistance... Keith Herbert, Training Specialist

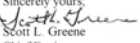
Dear Madam:

Rarely is the opportunity presented, to draft a letter complementing an individual for illustrating a degree of professionalism that sets the "Standard" of what constitutes technical support. Commencing with our initial phone conversation, several site visits, research, and networking opportunities (with contact names and numbers), Keith remained committed in assisting us in resolving our operational issues.

Diagnostics were approached in a good natured manner, which not only made problem solving easier, but readily evolved into an educational process as well. Keith remained "Pro-Active" throughout the entire event by his frequent phone calls requesting a status upgrade ("How's your Numbers/Can I Be Of Any Assistance?")

I wish to apologize to the Herbert family, and his fellow co-workers, for any weight gained during his consultations. Staff lunches at our facilities can be little high in calories.

On behalf of my staff, I wish to thank you for staffing personnel with such a high degree of competency and concern. We look forward to attending future training sessions conducted by the N.Y. Rural Water Association.

Sincerely yours,

Scott L. Greene
Chief Engineer

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June 6, 2005

Ms. Patricia Scalera
Chief Executive Director
New York Rural Water Association
P.O. Box 487
Claverack, New York 12513

RE: Water & Sewer Rates Training

Dear Patricia:

This letter is written in sincere appreciation and thanks for the recent training provided to the Board of Trustees of our Village concerning water & sewer rates. This training was provided by Douglas Smorol - Circuit Rider II, and Michael McCormack - State Circuit Rider, on April 20, 2005. The Village Board of Trustees was very impressed with the whole presentation, especially the knowledge and expertise of both Doug and Mike, they should be highly commended for such.

The New York Rural Water Association should also be commended for it's work in simply being ready to provide such services to communities such as ours. Although our's was a non-emergency, it is a comfort to know that we can turn to the New York Rural Water Association whenever a need arises.

Again, on behalf of the Village of Lowville Board of Trustees, I sincerely thank the New York Rural Water Association for their knowledge, expertise, and perhaps most importantly, their time and willingness to assist us.

Sincerely,

Brian M. Bush, P.E.
Superintendent of Public Works

cc: Board of Trustees
Village Administrator

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