CERTIFIED MAIL - RETURN RECEIPT REQUESTED
Article Number: 7016 0910 0000 4441 2881

Tiffany Martin Hamilton, Mayor
City of Hudson
520 Warren Street
Hudson, New York 12534

Re: Administrative Docket No. CWA-02-2017-3041
City of Hudson Sewage Treatment Plant SPDES Permit No. NY0022039
Clean Water Act (CWA) Administrative Compliance Order

Dear Mayor Hamilton:

Please find enclosed an Administrative Compliance Order ("Order"), which the United States Environmental Protection Agency ("EPA"), Region 2 is issuing to the City of Hudson pursuant to Section 309(a) of the Clean Water Act ("CWA"), 33 U.S.C. § 1319(a). The EPA is issuing the Order because the City of Hudson has violated CWA Sections 301 and 402, 33 U.S.C. § 1311 and § 1342, for failing to comply with the conditions and limitations of its New York State Department of Environmental Conservation State Pollutant Discharge Elimination System Permit No. NY0022039.

Please acknowledge receipt of the Order by signing the acknowledgment page and returning the acknowledgment page by mail in the enclosed envelope. Failure to comply with the enclosed Order may subject the City of Hudson to civil or criminal penalties pursuant to Section 309 of the CWA, 33 U.S.C. § 1319, and subject the City of Hudson to ineligibility for participation in work associated with Federal contracts, grants or loans.

Also enclosed is the EPA's compliance inspection report for its inspection of the City of Hudson sanitary sewer system conducted on October 18, 2016. The inspection report documents EPA’s observations during the inspection, which are documented in the Findings of Fact and Conclusions of Law section of the Order.

If you have any questions regarding the enclosed Order, please contact Mr. Larry Gaugler, Team Leader, NPDES Team, at (212) 637-3950.

Sincerely,

Kathleen Anderson, Acting Director
Division of Enforcement and Compliance Assistance
Enclosures

cc: (w/enclosures)
   Alison Wasserbauer, Environmental Engineer, NYSDEC Central Office Albany (electronic copy)
   Robert Perry, Superintendent of Department of Public Works, City of Hudson
   Les Coon, Chief Operator, City of Hudson
   Brock Juusola, P.E., Delaware Engineering. P.C. (electronic copy)
IN THE MATTER OF:

The City of Hudson
North Front and Dock Street
Hudson, New York 12534

SPDES Permit No. NY0022039

Proceeding pursuant to Section 309(a) of the Clean Water Act, 33 U.S.C. § 1319(a)

RESPONDENT

ADMINISTRATIVE COMPLIANCE ORDER

CWA-02-2017-3041

A. STATUTORY AND REGULATORY AUTHORITY

The following Administrative Compliance Order ("Order") is issued pursuant to Section 309(a) of the Clean Water Act ("CWA" or "Act"), 33 U.S.C. § 1319(a). This authority has been delegated by the Administrator of the United States Environmental Protection Agency ("EPA") to the Regional Administrator, EPA Region 2, and further delegated to the Director of the Division of Enforcement and Compliance Assistance, EPA Region 2.

1. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), makes it unlawful for any person to discharge any pollutant from a point source to waters of the United States, except, among other things, with the authorization of, and in compliance with, a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

2. Section 402 of the CWA, 33 U.S.C. § 1342, authorizes the Administrator of the EPA to issue a NPDES permit for the discharge of any pollutant, or combination of pollutants subject to certain requirements of the CWA and conditions which the Administrator determines are necessary. The New York State Department of Environmental Conservation ("NYSDEC") is the agency with the authority to administer the federal NPDES program in New York pursuant to Section 402(b) of the CWA, 33 U.S.C. § 1342(b). Under this authority, a State Pollutant Discharge Elimination System ("SPDES") permit is required to be issued to facilities by the NYSDEC for the discharge of pollutants from a point source to navigable waters of the United States. The EPA maintains concurrent enforcement authority with authorized States for violations of the CWA and permits issued by authorized States thereunder.

3. "Person" is defined by Section 502(5) of the CWA, 33 U.S.C. § 1362(5), to include any individual, corporation, partnership, association or municipality.
4. “Municipality” is defined by Section 502(4) of the CWA, 33 U.S.C. § 1362(4), to include among other things, a city, town, borough, county, parish, district, associations, or other public body created by or pursuant to State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes.

5. “Discharge of a pollutant” is defined by Section 502(12) of the CWA, 33 U.S.C. § 1362(12), to include any addition of any pollutant to navigable waters from any point source.

6. “Pollutant” is defined by Section 502(6) of the CWA, 33 U.S.C. § 1362(6), to include among other things, solid waste, dredged spoil, rock, sand, cellar dirt, sewage, sewage sludge and industrial, municipal and agricultural waste discharged into water.

7. “Point source” is defined by Section 502(14) of the CWA, 33 U.S.C. § 1362(14), to include any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, or vessel or other floating craft, from which pollutants are or may be discharged.

8. Section 502(7) of the CWA, 33 U.S.C. § 1362(7), defines navigable waters to be “waters of the United States, including the territorial seas.” EPA regulations promulgated pursuant to the CWA define the term “waters of the United States” to include, among other things: 1) all waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide; 2) all interstate waters; 3) all other waters such as intrastate lakes, rivers and streams (including intermittent streams), the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce; 4) tributaries of waters of the United States; and 5) certain wetlands (including wetlands adjacent to these waters). 40 C.F.R. § 122.2.

9. Section 402(q) of the CWA, 33 U.S.C. § 1342(q), provides that each permit, order, or decree issued pursuant to the chapter after December 21, 2000, for a discharge from a municipal combined storm and sanitary sewer shall conform to the Combined Sewer Overflow Policy (“CSO Policy”) signed by the Administrator on April 11, 1994.

10. The CSO Policy states that “permittees with CSOs are responsible for developing and implementing long-term CSO control plans that will ultimately result in compliance with the requirements of the CWA.”

11. Section 309(a) of the CWA, 33 U.S.C. § 1319(a), authorizes the Administrator to issue an order requiring compliance or commence a civil action when any person is found to be in violation of Section 301 of the CWA, 33 U.S.C. § 1311, or in violation of any permit condition or limitation in a permit issued under Section 402 of the CWA, 33 U.S.C. § 1342.

B. FINDINGS OF FACT AND CONCLUSIONS OF LAW

The Director makes the following findings of fact and conclusions of law:
1. The City of Hudson ("Respondent" or "Hudson"), is a City established under the laws of the State of New York. Hudson is a "municipality" and "person" within the meaning of Sections 502(4) and 502(5) of the CWA, 33 U.S.C. § 1362(4) and 1362(5).

2. Respondent owns and operates the combined sewer system ("CSS") within the City of Hudson. The City of Hudson has authority and control over the CSS within its boundaries. The CSS includes the City of Hudson Sewage Treatment Plant ("STP") located on North Front and Dock Street, Hudson, New York 12534, which is owned and operated by Respondent.

3. The NYSDEC, under the authority of Section 402(b) of the CWA, 33 U.S.C § 1342(b), issued SPDES Discharge Permit No. NY0022039 ("Permit") to the City of Hudson for its STP, with an effective date of April 01, 2001. The Permit has an expiration date of April 01, 2006. The Permit remains in effect under the provisions of the State Administrative Procedures Act (SAPA).

4. The Permit authorizes Respondent to discharge "pollutants", such as sewage, within the meaning of Sections 502(12) and (6) of the CWA, 33 U.S.C. §§ 1362(12) and (6), from a single STP outfall, outfall No. 001, which is a point source within the meaning of Section 502(14) of the CWA, 33 U.S.C. § 1362(14), to the Hudson River, which is a "navigable water" within the meaning of Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

5. The Permit also authorizes Respondent to discharge "pollutants", such as sewage, from nine (9) CSO overflow locations, additional point sources within the meaning of Section 502(14) of the CWA, 33 U.S.C. § 1362(14), located within Respondent’s CSS. The Permit authorizes outfalls 002, 003, 005, 007, 009 and 010 to discharge to the Hudson River. The Hudson River is a "navigable water" of the United States within the meaning of Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

6. The Permit authorizes outfalls 006, 011 and 012 to discharge to Underhill Pond. Flow from Underhill Pond is conveyed by a pipe to a culvert beneath Harry Howard Avenue which eventually ties into a storm sewer line at Mill Street. The storm sewer piping discharges to a tributary of North Bay, which flows into North Bay and ultimately into the Hudson River. The classification number for the tributary from Underhill Pond to North Bay/Hudson River is H-201a. The Hudson River is a "navigable water" of the United States within the meaning of Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

7. On October 18, 2016, the EPA conducted a compliance evaluation inspection ("CEI") of Respondent’s CSS and evaluated the City of Hudson’s compliance as it relates to the Permit, specifically the requirements for Best Management Practices ("BMPs") for CSOs. This includes BMP Number 1, BMP Number 2 and BMP Number 14 as listed in the Permit as follows:

   a. **BMP Number 1 (CSO Maintenance/Inspection)** - The permittee shall develop a written maintenance and inspection program for all CSOs listed on page(s) 2 of the permit. This program shall include all regulators tributary to these CSOs, 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 Hudson (C) 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 snow melt, condition of equipment and work required. These reports shall be in a format approved by the Region 4 Office and submitted to the Region with the monthly operating report (Form 92-15-7).

b. **BMP Number 2 (Maximum Use of Collection System for Storage)** - The permittee shall optimize the collection 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 Hudson (C) treatment plant. 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.

c. **BMP Number 14 (Characterization and Monitoring)** – The permittee shall characterize the combined sewer system, determine the frequency of overflows, and identify CSO impacts in accordance with Combined Sewer Overflows, Guidance for Nine Minimum Controls, EPA, 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.

8. Based on the CEI findings, the EPA finds Respondent has failed to comply with the CWA and with the above-specified requirements of its SPDES Permit as follows:

a. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City indicated that there was no written program for the operation, inspection and maintenance of the CSS. This is a violation of BMP Number 1 of the Permit.

b. The City provided its CSO inspection records for 5/30/16 to 12/01/16 which address CSOs 002, 005 and 006. Based on its CSO inspection records, the City did not inspect all of its CSOs. The CSOs were not inspected weekly, and they were not inspected during both dry and wet weather conditions. The CSO inspection records were all wet weather inspections. This is a violation of BMP Number 1 of the Permit.

c. The CSO inspection records which the City provided for 5/30/16 to 12/01/16 do not indicate visual inspections, any observed flow, condition of equipment and work required. This is a violation of BMP Number 1 of the Permit.

d. At the time of the CEI, the City was not submitting its CSO inspection records, along with its monthly operating report, to the NYSDEC. This is a violation of BMP Number 1 of the Permit.
e. At the time of the CEI, the City did not have a continuous program of flushing or cleaning to prevent deposition of solids to maximize storage. This is a violation of BMP Number 2 of the Permit.

f. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City indicated that it had not characterized the combined sewer system, determined the frequency of overflows, or identified CSO impacts. This is a violation of BMP Number 14 of the Permit.

C. ORDERED PROVISIONS

Based upon the Findings of Fact and Conclusions of Law, above, and pursuant to the authority of Section 309(a) of the CWA, 33 U.S.C. § 1319(a), Respondent is hereby ORDERED to do the following:

1. Immediately upon receipt of this Order, a responsible official of the Respondent shall complete and sign the acknowledgment of receipt and return the acknowledgment page to the Chief, Water Compliance Branch, as set forth in paragraph D.1, in the enclosed envelope.

2. By October 1, 2017, the Respondent shall comply with the terms and conditions of its SPDES Permit, and shall submit supporting documentation to EPA and NYSDEC Region 4, as follows:
   a. Respondent shall develop and implement a written maintenance and inspection program for all CSOs listed on page 2 of its Permit which are currently in use. This program shall consist of weekly inspections, and shall be conducted during periods of both dry and wet weather. This program shall consist of inspections with required repair, cleaning, and maintenance done as needed. CSO inspection reports shall be completed indicating visual inspections, any observed flow, incidence of rain or snow melt, condition of equipment and work required, in accordance with BMP Number 1 of its Permit.
   b. Respondent shall submit the CSO inspection reports with the monthly operating report to the NYSDEC Region 4, in accordance with BMP Number 1 of its Permit.
   c. Respondent shall develop and implement a preventative operation and maintenance program for the collection system that includes a continuous program of flushing and cleaning to prevent the deposition of solids to maximize the use of the collection system for storage, in accordance with BMP Number 2 of its Permit.
   d. Respondent shall characterize the combined sewer system, determine the frequency of overflows, and identify CSO impacts, in accordance with BMP Number 14 of its Permit.

D. GENERAL PROVISIONS

1. Any information or documents to be submitted by Respondent as part of this Order shall, pursuant to 40 C.F.R. § 122.22, be sent by certified mail or its equivalent, or by electronic submission to:

City of Hudson
Docket No. CWA-02-2017-3041
Nicole Foley Kraft, Acting Branch Chief
Water Compliance Branch
Division of Enforcement and Compliance Assistance
U.S. Environmental Protection Agency - Region 2
290 Broadway - 20th floor
New York, NY 10007-1866
(212) 637-3093
kraft.nicole@epa.gov

and

Derek Thorsland, Regional Water Engineer
New York State Department of Environmental Conservation - Region 4
1130 North Westcott Road
Schenectady, New York 12306
derek.thorsland@dec.ny.gov

and shall be signed by an authorized representative of Respondent, and shall include the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Electronic submissions are encouraged.

2. For a period of twenty (20) days from the effective date of this Order, Respondent shall have the opportunity to confer with the Agency representative named above, in paragraph D.1. The effective date is the date of execution by the Director, Division of Enforcement and Compliance Assistance.

3. Respondent may seek federal judicial review of the CWA Section 309(a) Administrative Compliance Order pursuant to Chapter 7 of the Administrative Procedure Act, 5 U.S.C. §§ 701-706.

4. This Order does not constitute a waiver from compliance with, or a modification of, the effective terms and conditions of the CWA, its implementing regulations, or any applicable permit, which remain in full force and effect. It is an action taken by the EPA to ensure swift compliance with the CWA, and its issuance shall not be deemed an election by the EPA to forego any civil or criminal actions for penalties, fines, imprisonment, or other appropriate relief under the CWA.
5. Notice is given for failure to comply with the requirements of the CWA Section 309(a) and complete the provisions ordered in Section C, above, pursuant to CWA Section 309(a), may result in Respondent’s liability for civil penalties for each violation of up to $52,414 per day under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), as modified by 40 C.F.R. Part 19. Upon suit by the EPA, the United States District Court may impose such penalties if, after notice and opportunity for a hearing, the Court determines that Respondent has violated the CWA as described above and failed to comply with the Ordered Provisions. The District Court has the authority to impose separate civil penalties for any violations of the CWA and for any violations of the Administrative Compliance Order.

6. If any provision of this Order is held by a court of competent jurisdiction to be invalid, any surviving provisions shall remain in full force and effect.

7. This Order shall become effective upon the date of execution by the Director, Division of Enforcement and Compliance Assistance.

Dated: APR 11 2017

Signed: [Signature]

Kathleen Anderson, Acting Director
Division of Enforcement and Compliance Assistance
IN THE MATTER OF:

The City of Hudson
North Front and Dock Street
Hudson, New York 12534

SPDES Permit No. NY0022039

Respondent.

Proceeding pursuant to Section 309(a) of the Clean Water Act, and 1319(a).

ADMINISTRATIVE COMPLIANCE ORDER
CWA-02-2017-3041

ACKNOWLEDGMENT OF RECEIPT OF ADMINISTRATIVE COMPLIANCE ORDER

I, ____________________________, an officer of the City of Hudson, with the title of, ____________________________, do hereby acknowledge the receipt of copy of the ADMINISTRATIVE COMPLIANCE ORDER, CWA-02-2017-3041.

DATE: ____________________ SIGNED: _______________________

City of Hudson
Docket No. CWA-02-2017-3041
# Water Compliance Inspection Report

## Section A: National Data System Coding (i.e., PCS)

<table>
<thead>
<tr>
<th>Transaction Code</th>
<th>NPDES</th>
<th>yr/mo/day</th>
<th>Inspection Type</th>
<th>Inspector</th>
<th>Fac Type</th>
</tr>
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<tbody>
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<td>3 9 1</td>
<td>1 6 1 0 1 1 1 0</td>
<td>1 8 1 1</td>
<td>19 2 0 1</td>
<td></td>
</tr>
<tr>
<td>Remarks</td>
<td>6 6</td>
<td>0 1 6 9</td>
<td>70</td>
<td>71</td>
<td>72</td>
</tr>
</tbody>
</table>

## Section B: Facility Data

- **Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number)**
  - Hudson City, Sewerage Treatment Plant
  - North Front and Dock Street
  - Hudson, New York 12534

- **Entry Time/Date**
  - 6:00 am/10-18-2016

- **Exit Time/Date**
  - 3:35 pm/10-18-2016

- **Permit Effective Date**
  - 6/01/2011

- **Permit Expiration Date**
  - 05/31/2016

- **Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Number(s)**
  - Robert Perry, Superintendent, Department of Public Works, City of Hudson, (518) 965-5235
  - Lee Coon, Chief Operator, City of Hudson, (518) 828-1020
  - Brook Jussela, P.E., Delaware Engineering, P.C., (518) 452-1260

- **Other Facility Data (e.g., SIC NAICS, and other descriptive information)**
  - SIC Code: 4952
  - NYSDEC is undertaking a full technical review of the SPDES discharge to determine the need to incorporate new permit requirements. The current permit is in effect under the State Administrative Procedures Act (SAPA)

- **Name, Address of Responsible Official/Title/Phone and Fax Number**
  - Tiffany Martin Hamilton, Mayor
  - City of Hudson
  - 520 Warren Street
  - Hudson, NY 12534

- **Contacted**
  - Yes

## Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

- Permit
- Records/Reports
- Facility Site Review
- Effluent/Receiving Waters
- Flow Measurement
- Self-Monitoring Program
- Compliance Schedules
- Laboratory
- Operations & Maintenance
- Pretreatment
- Sludge Handling/Disposal
- Pollution Prevention
- Storm Water
- Combined Sewer Overflow
- Sanitary Sewer Overflow
- MS4

## Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

See attached report.

<table>
<thead>
<tr>
<th>SEV Codes</th>
<th>SEV Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Management Practice Violations - Best Management Practice Deficiencies</td>
</tr>
</tbody>
</table>

- Name(s) and Signature(s) of Inspector
  - Zarine Ali, Physical Scientist
    - Agency/Office/Phone and Fax Numbers: R2-DBCA-WCB/212-637-3919/212-637-3953
    - Date: 05/16/17

- Signature of Management Q/A Reviewer
  - Larry Gugler, P.E., NPDES Team Leader
    - Agency/Office/Phone and Fax Numbers: R2-DBCA-WCB/212-637-3950/212-637-9353
    - Date: 05/16/17

EPA Form 3560-3 (Rev 4-06) Previous editions are obsolete.
INSTRUCTIONS

Section A: National Data System Coding (i.e., PCS)

Column 1: Transaction Code. Use N, C, or D for New, Change, or Delete. All inspections will be new unless there is an error in the data entered.

Columns 3-11: NPDES Permit No. Enter the facility’s NPDES permit number - third character in permit number indicates permit type for U=unpermitted, G=general permit, etc. (Use the Remarks columns to record the State permit number, if necessary.)

Columns 12-17: Inspection Date. Insert the date entry was made into the facility. Use the year/month/day format (e.g., 04/10/01 = October 01, 2004).

Column 18: Inspection Type*. Use one of the codes listed below to describe the type of inspection:

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Performance Audit</td>
</tr>
<tr>
<td>B</td>
<td>Compliance Biomonitoring</td>
</tr>
<tr>
<td>C</td>
<td>Compliance Evaluation (non-sampling)</td>
</tr>
<tr>
<td>D</td>
<td>Diagnostic</td>
</tr>
<tr>
<td>F</td>
<td>Pretreatment (Follow-up)</td>
</tr>
<tr>
<td>G</td>
<td>Pretreatment (Audit)</td>
</tr>
<tr>
<td>I</td>
<td>Industrial User (IU) Inspection</td>
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<tr>
<td>J</td>
<td>Complaints</td>
</tr>
<tr>
<td>M</td>
<td>Multimedia</td>
</tr>
<tr>
<td>N</td>
<td>Spill</td>
</tr>
<tr>
<td>O</td>
<td>Compliance Evaluation (Oversight)</td>
</tr>
<tr>
<td>P</td>
<td>Pretreatment Compliance Inspection</td>
</tr>
<tr>
<td>R</td>
<td>Reconnaissance</td>
</tr>
<tr>
<td>S</td>
<td>Compliance Sampling</td>
</tr>
<tr>
<td>U</td>
<td>IU Inspection with Pretreatment</td>
</tr>
<tr>
<td>X</td>
<td>Toxics Inspection</td>
</tr>
<tr>
<td>Z</td>
<td>Sludge - Biosolids</td>
</tr>
<tr>
<td>#</td>
<td>Combined Sewer Overflow-Sampling</td>
</tr>
<tr>
<td>$</td>
<td>Combined Sewer Overflow-Non-Sampling</td>
</tr>
<tr>
<td>@</td>
<td>Sanitary Sewer Overflow-Sampling</td>
</tr>
<tr>
<td>$</td>
<td>Sanitary Sewer Overflow-Non-Sampling</td>
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<tr>
<td>(</td>
<td>Pretreatment Compliance (Oversight)</td>
</tr>
<tr>
<td>)</td>
<td>Follow-up (enforcement)</td>
</tr>
<tr>
<td>{</td>
<td>Storm Water-Construction-Sampling</td>
</tr>
<tr>
<td>}</td>
<td>Storm Water-Construction-Non-Sampling</td>
</tr>
<tr>
<td>‘</td>
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<td>&lt;</td>
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<td>=</td>
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<td>&gt;</td>
<td>Storm Water-MS4-Audit</td>
</tr>
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</table>

Column 19: Inspector Code. Use one of the codes listed below to describe the lead agency in the inspection:

<table>
<thead>
<tr>
<th>Code</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>State (Contractor)</td>
</tr>
<tr>
<td>B</td>
<td>EPA (Contractor)</td>
</tr>
<tr>
<td>C</td>
<td>Corps of Engineers</td>
</tr>
<tr>
<td>J</td>
<td>Joint EPA/State Inspectors—EPA Lead</td>
</tr>
<tr>
<td>L</td>
<td>Local Health Department (State)</td>
</tr>
<tr>
<td>N</td>
<td>NEIG Inspectors</td>
</tr>
<tr>
<td>O</td>
<td>Other Inspectors, Federal/EPA (Specify in Remarks columns)</td>
</tr>
<tr>
<td>P</td>
<td>Other Inspectors, State (Specify in Remarks columns)</td>
</tr>
<tr>
<td>R</td>
<td>EPA Regional Inspector</td>
</tr>
<tr>
<td>S</td>
<td>State Inspector</td>
</tr>
<tr>
<td>T</td>
<td>Joint State/EPA Inspectors—State lead</td>
</tr>
</tbody>
</table>

Column 20: Facility Type. Use one of the codes below to describe the facility:

1. Municipal. Publicly Owned Treatment Works (POTWs) with 1987 Standard Industrial Code (SIC) 4952.
2. Industrial. Other than municipal, agricultural, and Federal facilities.
4. Federal. Facilities identified as Federal by the EPA Regional Office.
5. Oil & Gas. Facilities classified with 1987 SIC 1311 to 1389.

Columns 21-66: Remarks. These columns are reserved for remarks at the discretion of the Region.

Columns 67-69: Inspection Work Days. Estimate the total work effort (to the nearest 0.1 work day), up to 99.9 days, that were used to complete the inspection and submit a QA reviewed report of findings. This estimate includes the accumulative effort of all participating inspectors, any effort for laboratory analyses, testing, and remote sensing; and the billed payroll time for travel and pre and post inspection preparation. This estimate does not require detailed documentation.

Column 70: Facility Evaluation Rating. Use information gathered during the inspection (regardless of inspection type) to evaluate the quality of the facility self-monitoring program. Grade the program using a scale of 1 to 5 with a score of 5 being used for very reliable self-monitoring programs, 3 being satisfactory, and 1 being used for very unreliable programs.

Column 71: Biomonitoring Information. Enter D for static testing. Enter F for flow through testing. Enter N for no biomonitoring.

Column 72: Quality Assurance Data Inspection. Enter Q if the inspection was conducted as followup on quality assurance sample results. Enter N otherwise.

Columns 73-80: These columns are reserved for regionally defined information.

Section B: Facility Data

This section is self-explanatory except for “Other Facility Data,” which may include new information not in the permit or PCS (e.g., new outfalls, names of receiving waters, new ownership, other updates to the record, SIC/NAICS Codes, Latitude/Longitude).

Section C: Areas Evaluated During Inspection

Check only those areas evaluated by marking the appropriate box. Use Section D and additional sheets as necessary. Support the findings, as necessary, in a brief narrative report. Use the headings given on the report form (e.g., Permit, Records/Reports) when discussing the areas evaluated during the inspection.

Section D: Summary of Findings/Comments

Briefly summarize the inspection findings. This summary should abstract the pertinent inspection findings, not replace the narrative report. Reference a list of attachments, such as completed checklists taken from the NPDES Compliance Inspection Manuals and pretreatment guidance documents, including effluent data when sampling has been done. Use extra sheets as necessary.

*Footnote: In addition to the inspection types listed above under column 18, a state may continue to use the following wet weather and CAFO inspection types until the state is brought into IOIS-NPDES: K; CAFO; V; SSO; Y; CSO; W; Storm Water 9; MS4. States may also use the new wet weather, CAFO and MS4 inspections types shown in column 18 of this form. The EPA regions are required to use the new wet weather, CAFO, and MS4 inspection types for inspections with an inspection date (DTIN) on or after July 1, 2005.
**I. Background and Findings**

**Collection System:**

1. The purpose of this inspection was to assess the City’s compliance with SPDES Permit No. NY0022039, specifically regarding its Best Management Practices and Long Term Control Plan for Combined Sewer Overflows.

2. The City of Hudson Sewage Treatment Plant (STP), hereinafter designated “the City,” has coverage under New York State Department of Environmental Conservation (NYSDEC) State Pollutant Discharge Elimination System (SPDES) individual discharge Permit No. NY0022039, for treated effluent discharges to the Hudson River via Outfall #001 and for Combined Sewer Overflow (CSO) discharges from permitted CSO outfalls.

3. SPDES Permit No. NY0022039 was renewed from April 1, 2006, through March 31, 2011. The Permit was then renewed from June 1, 2011, through May 31, 2016.
4. The City provided a letter dated December 2, 2015, from the NYSDEC which explains that the NYSDEC received the City’s application to renew its SPDES Permit on 11/18/2015. According to this document, “prior to moving forward with the administrative procedures required for permit renewal, the department will be undertaking a full technical review of the SPDES discharge to determine the need to incorporate new permit requirements under the Federal Clean Water Act.” The current permit will remain in effect after the expiration date, under the provisions of the State Administrative Procedures Act (SAPA).

5. The City provided a map book of its entire collection system which is also on the City’s Department of Public Works (DPW) website. The City also has a “Hudson Outfall Map” which shows all the outfalls and outfall numbers. This map also shows the outfalls which are no longer in use (abandoned, plugged or storm only).

6. The entire collection system is owned and maintained by the permittee. The wastewater treatment plant (WWTP) and four (4) Pump Stations are managed by the WWTP employees. The DPW manages the collection system. According to the City’s municipal application form NY-2A, the plant began operation approximately in the year 1965 and the latest plant upgrade was in 2011.

7. The South Front Street pump station is the largest pump station and it is the only pump station with a permanent backup generator. This pump station has a radio alarm system which is connected to the plant’s supervisory control and data acquisition (SCADA) system. The South Front Street pump station has a flow meter. At the time of the CEI, the City provided the South Front Street’s influent flow to the wastewater treatment plant.

8. According to the City, a portable generator will be used if needed at the Water Street pump station, the Mill Street pump station and the Power Avenue pump station. The Mill Street pump station utilizes natural gas to power the pumps if electricity fails.

9. According to the City, all the pump stations are checked every day 7 days a week, except the Water Street pump station. According to the City, the Water Street pump station is the smallest pump station in terms of flow. This pump station only has flow during City events and in the winter it does not have flow. The Water Street pump station is checked periodically and it is checked more during Flag Day.

10. The WWTP’s permitted effluent flow limit is 2.8 million gallons per day (MGD) and this is based on a 30-day arithmetic mean. The WWTP is located at North Front and Dock Street, Hudson City, New York.

11. The City provided a copy of a report from Delaware Engineering, P.C., dated June 12th, 2013, which was submitted to the NYSDEC. This report includes the City’s Municipal Application Form NY-2A, in which the City request a SPDES modification to reflect upgrades to the City’s WWTP. According to this document, the collection system includes both separate and combined sections. The total length of the collection system is 21.7 miles with 15.1 miles being combined. The total population served is 6,753.
12. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, dated June 2008 (revisions thru March 2009), the northeast quadrant of the City is predominately served by a separate sewer system.

13. According to the City, the piping within the collection system dates from the 1800s and the piping includes: stone, brick, vitrified clay, cast iron, polyvinyl chloride (PVC) and asbestos cement. The diameter of the piping range from 6 inches to a 4’ x 6’ stone arch. According to the City’s “Draft Infiltration and Inflow Investigation and Remediation Plan” Report, dated December 15th, 2010, the majority of the sewer system was constructed between 1834 and the 1930s.

14. At the time of the CEI, the City provided a copy of its yearly report for 2016 which includes the wastewater treatment plant’s effluent total in (MG) for the period January to September.

<table>
<thead>
<tr>
<th>Month</th>
<th>Effluent Total (MG)</th>
</tr>
</thead>
<tbody>
<tr>
<td>January</td>
<td>42.41</td>
</tr>
<tr>
<td>February</td>
<td>50.97</td>
</tr>
<tr>
<td>March</td>
<td>38.09</td>
</tr>
<tr>
<td>April</td>
<td>38.14</td>
</tr>
<tr>
<td>May</td>
<td>70.28</td>
</tr>
<tr>
<td>June</td>
<td>34.60</td>
</tr>
<tr>
<td>July</td>
<td>40.73</td>
</tr>
<tr>
<td>August</td>
<td>38.38</td>
</tr>
<tr>
<td>September</td>
<td>29.36</td>
</tr>
<tr>
<td>Total</td>
<td>382.95</td>
</tr>
</tbody>
</table>


16. According to the City’s “Draft Infiltration and Inflow Investigation and Remediation Plan” Report, dated December 15th, 2010, the City was divided into twelve separate drainage areas based on topography, for the purpose of conducting a hydraulic analysis. It was determined that most of the Inflow and Infiltration (I/I) is from stormwater and not from groundwater infiltration or tidal influence. Each drainage area is comprised of between 10 and 90 sanitary sewer manholes in addition to storm structures.

17. According to the I/I report there are sanitary manholes which are covered with open grates throughout the City. The report identifies these areas. The I/I report recommended covering these manholes with a solid cover to reduce stormwater from entering the collection system. It is not known if the City has replaced the covers for these manholes.

18. According to the City, approximately ½ million gallons of groundwater goes into the main each day. According to the City, approximately in 2005, pipe lining was done on Harry Howard Avenue.
II. INSPECTION FINDINGS: CSO BMPs

**CSO Maintenance/Inspection** – The permittee shall develop a written maintenance and inspection program for all CSOs listed on page(s) 2 of the permit. This program shall include all regulators tributary to these CSOs, 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 Hudson (C) 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 snow melt, condition of equipment and work required. These reports shall be in a format approved by the Region 4 Office and submitted to the Region with the monthly operating report (Form 92-15-7).

1. The City has coverage under SPDES Permit NY0022039 for CSO outfall discharges during wet weather via nine (9) Outfalls.

<table>
<thead>
<tr>
<th>Outfall #</th>
<th>Location</th>
<th>Receiving Water</th>
</tr>
</thead>
<tbody>
<tr>
<td>002 – This outfall has been separated into two outfalls:</td>
<td></td>
<td></td>
</tr>
<tr>
<td>002 A</td>
<td>Primary treatment and disinfection</td>
<td>Hudson River-North Bay</td>
</tr>
<tr>
<td>002 B</td>
<td>Overflow prior to headworks at WWTP</td>
<td>Hudson River – North Bay</td>
</tr>
<tr>
<td>003</td>
<td>Overflow on Front Street</td>
<td>Hudson River – North Bay</td>
</tr>
<tr>
<td>005</td>
<td>Overflow at S. Front Street Pump Station</td>
<td>Hudson River</td>
</tr>
<tr>
<td>006</td>
<td>7th Street Overflow</td>
<td>Underhill Pond</td>
</tr>
<tr>
<td>007</td>
<td>Power Avenue Ejector Station</td>
<td>Hudson River – South Bay</td>
</tr>
<tr>
<td>009</td>
<td>Mill Street Ejector Station</td>
<td>Hudson River – North Bay</td>
</tr>
<tr>
<td>010 – This outfall is abandoned</td>
<td>Dock Street Ejector Station</td>
<td>Hudson River</td>
</tr>
<tr>
<td>011 – Stormwater only overflow</td>
<td>Clinton Street &amp; Short Street</td>
<td>Underhill Pond</td>
</tr>
<tr>
<td>012 – Has been plugged and abandoned</td>
<td>Harry Howard Boulevard</td>
<td>Underhill Pond</td>
</tr>
</tbody>
</table>

2. In a letter to the NYSDEC dated June 12th, 2013, the City requested that outfalls # 010, # 011 and # 012 be removed from the SPDES Permit.

3. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, which has a signed date of 01/29/2016, the City of Hudson employees make all repairs to the sewer mains throughout the City. All service connections are the responsibility of the property owner.
4. At the time of the CEI, the City provided its wet weather inspection record for three (3) of its CSOs for the period 5/30/16 to 9/27/16. After the CEI, the City sent this inspection record to include the period up to 12/1/16. The CSOs inspected by the City include:

   - The 7th Street Diversion Structure/Manhole (#006)
   - Cross Street manhole (#005) - According to the City, this CSO is fed from the South Front Street Pump Station which never overflows and from the overflow weir.
   - Overflow Contact tanks (#002 A)

5. The City’s CSO wet weather inspection record documents the date, precipitation amount in inches, if the “tattle tail” (a wooden float tied to a rope) at the 7th Street manhole and the Cross Street manhole moved or was ok and the flow in million gallons (MG) at the Overflow Contact tanks. The flow at the overflow contact tanks is metered, whereas the 7th Street manhole and the Cross Street manhole do not have flow meters in them. It is unknown if the City conducts inspections during dry weather conditions. As the City only provided its inspection record for three (3) of its CSOs, it is unknown if the City does inspections for all of its CSOs listed on page two (2) of its Permit which have not been plugged and with what frequency these inspections are conducted.

6. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the City conducts overflow observation of CSOs at least weekly. It is unknown if the City does weekly inspections.

   - This document does not include any written procedures which describes how the City conducts inspections and maintenance of the CSOs listed on page 2 of the permit and it does not explain how the City conducts inspections during dry and wet weather.

   - According to this document (page 7), “the observation log for CSOs and CSO Diversions utilized by the City has been revised to incorporate observation of CSOs and diversion chambers while recording more data.” Attachment #2 of this document contains the observation log, which documents the observation point, location, date and time, weather/precipitation, CSO Discharge Y/N (Est. Duration), Observations (Floatables) and Corrective Action. It is unknown if the City uses this observation log.

   - According to this document (page 7), the list of inspection activities include: “completion of Inspection Reports acknowledging rain and snowmelt status, physical observations, including floatable status and cleaning/repair/maintenance performed.” The CSO wet weather inspection record which the City provided for the 7th street manhole, the Cross Street manhole and the Overflow Contact tanks does not incorporate these observations.

7. According to the City’s “Combined Sewer Overflows Annual Report” for 2015 (BMP #1), the City indicated that there was no written program for the operation, inspection and maintenance of the CSS.
• According to this document, the City indicated that inspections are conducted during dry and wet weather. The CSO wet weather inspection record which the City provided for the 7th Street Manhole, the Cross Street manhole and the Overflow Contact tanks does not include dry weather inspections, they were all wet weather inspections. The City indicated one (1) pre rain check inspection on 8/10/16.

• According to the City’s CSO wet weather inspection record, on 10/22/16 (after the CEI), there was a precipitation event of 0.7-inches and the City indicated that the 7th Street manhole and the Cross Street manhole were not checked. On 10/23/2016, there was a 0.7-inch precipitation event and these two locations were inspected, the “tattle tail” at both locations were moved.

• As the CSO inspection record which the City provided does not include dry weather inspections, the frequency in which the City conducts dry weather inspections are not known. The permit requires weekly inspections for all CSOs. The wet weather inspections are not all within one week. The City did an inspection on 6/11/16 of the 7th Street manhole, the Cross Street manhole and the Overflow Contact tanks and the next inspection was on 6/27/16 which was a pre rain check. The City’s permit requires weekly inspections.

8. At the time of the CEI, the Diversion Chamber/Manhole (CSO #003) located at North Front Street was not being adequately repaired, cleaned or maintained by the City. According to the City, this CSO is cleaned once per year and it was last cleaned in 2015. According to the City, this CSO has steel plates which covers the channel which helps in its maintenance. At the time of the CEI, the steel plates were in their current location due to a storm event (field work photograph 1).

9. As noted under CSO Maintenance/Inspections (BMP #1) – “Inspection reports shall be completed indicating visual inspection, any observed flow, incidence of rain or snow melt, condition of equipment and work required. These reports shall be in a format approved by the Region 4 Office and submitted to the Region with the monthly operating report."

• According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City’s inspection reports do not indicate visual inspection, any observed flows, incidence of rain or snowmelt, condition of equipment, and any work required. The CSO wet weather inspection report, which the City provided for the 7th Street manhole, the Cross Street manhole and the Overflow Contact tanks, indicate the precipitation in inches, if the “tattle tail” moved or not and the flow in MG at the Overflow Contact tanks. They do not incorporate additional information.
• According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the CSO inspection reports are not submitted to the NYSDEC regional office with the monthly operating reports.

**Maximum Use of Collection System for Storage** – The permittee shall optimize the collection 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 Hudson (C) treatment plant. 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.

1. The City provided a copy of its “Combined Sewer Overflows Long-Term Control Plan” Report, dated December 2003. The Report was prepared by Stearns & Wheler Environmental Engineers and Scientist. According to the report, no regulator or orifice modifications are possible for the collection system. As described in the plan “all of the wet weather flow on the southern side of the system is directed to the South Front Street pump station, without upstream relief points (other than perhaps at the pump station on Third Street). On the north side of the system, the flow to the treatment plant is limited by the capacity of the plant itself, not a regulator or orifice type of device.”

2. According to the City’s “Combined Sewer Overflows Long-Term Control Plan,” Report, there are no sections within the City’s combined sewer system which have been identified as having significant in-line storage capacity. This is because of the small diameter of the City’s sewers and their steep slopes.

3. According to the City’s “Combined Sewer Overflows Long-Term Control Plan” Report:
   
   • “There does appear to be some potential benefit, however, in raising the weir at Allen Street and South Front Street. This work would be done in conjunction with a possible increase in the capacity of the South Front Street pump station.” The South Front Street pump station has been upgraded to convey up to 3,500 GPM to the WWTP. It is not known if the City raised the weir at Allen Street and South Front Street.

4. According to the City, there were some modeling to determine the hydraulic capacity of the system but not all the values were captured. The City’s “Combined Sewer Overflows Long-Term Control Plan” Report, details the City’s modeling efforts.

5. According to the City, the chlorine contact tank has a 115,000-gallon storage capacity.

6. According to the City, no adjustment is made to the weirs within the collection system.

7. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City indicated that there is no continuous program of flushing and cleaning to prevent deposition of solids. At the time of the CEI, the City stated that manholes are cleaned as needed. It is not known with what frequency the entire collection system is cleaned.
8. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, stormwater separation will create extra capacity in the Combined System by removing stormwater. The City has three (3) planned projects:

- Construct 750’ of Stormwater line on Green Street to divert from CSS.
- Design and construct Stormwater Trunk line on North Front Street.
- Convert 15+ Catch basins to infiltration units and separate reduced effluent into storm line.

**Industrial Pretreatment** – *The approved Industrial Pretreatment Program, if applicable, shall consider CSOs in the calculation of local limits for indirect discharges.*

1. According to the City, there is currently no industrial pretreatment program. The City no longer has any industrial facilities.

**Maximize Flow to POTW** – *The Hudson (C) treatment plant shall be capable of: receiving a minimum of 5.6 MGD through the plant headworks; a minimum of 4.2 MGD through the primary treatment works (and disinfection works if applicable); and a minimum of 4.2 MGD through the secondary treatment works during wet weather. The collection system and headworks must be capable of delivering these flows during wet weather.*

1. According to the City’s current permit, the WWTP permitted effluent flow is 2.8 MGD which is based on a 30-day arithmetic mean.

2. According to the City’s report dated June 12th, 2013, from Delaware Engineering, P.C., to the NYSDEC, which contains the City’s NY-2A form, the City has requested that the SPDES flow limit be increased to 4.0 MGD. According to the City, this request is based on a proportional flow increase of the wastewater treatment plant’s effluent treatment capacity.

   - According to the report, the wastewater treatment plant is capable of accepting up to 16.9 MGD through the headworks of the plant.

   - According to the report, up to 6.0 MGD can be accepted by secondary treatment processes and up to 10.9 MGD may be discharged (with primary treatment and disinfection).

   - According to the report, the secondary treatment processes are the flow limiting processes at the wastewater treatment plant. “As the capacity of these processes was increased from 4.2 MGD to 6.0 MGD (a 30% capacity increase) with plant upgrades, it is proposed that the permitted flow of 2.8 MGD also be increased by 30% to 4.0 MGD, to reflect the increase in capacity.”

   - According to the report, in January of 2011, a 30-day average daily flow of 2.62 MGD was recorded and during that month a maximum average daily flow of 5.56 MGD was recorded. The wastewater treatment plant was approaching its limit while
it was still capable of treating the wastewater flow. According to the report, as the wastewater treatment plant can provide primary treatment and disinfection for flows up to 16.9 MGD, a wet month can result in the wastewater treatment plant to exceed its current permitted flow of 2.8 MGD without discharging any untreated wastewater.

3. At the time of the CEI, the City discussed three (3) NY-Alert notifications which the EPA obtained from the NY-Alert system.

- 09/30/2015: At 58-98 N Front St, there was an overflow at the headworks. The notification report has the duration of the discharge as 1.0 hours on going (it is unknown when the discharge stopped), approximately 500 gallons per minute was released. The reason for the discharge is heavy rain which caused the bar screens to become blocked. According to the City, this event resulted in the wastewater treatment plant not being able to receive a flow of 5.6 MGD through the headworks.

- 09/30/2015: At 58-98 N Front St, there was an overflow from a manhole at Dock and Front Street. According to the City, this was due to the bar screen which failed at the headworks. The notification report has the duration of the discharge as 4.5 hours on going (it is unknown when the discharge stopped), approximately 500 gallons per minute was released. The reason for the discharge is heavy rain.

- 06/11/2016: At 2-194 Water Street, there was an overflow from a manhole. According to the City, this overflow was the result of the pump failure at the Water Street pump station. This pump station has one (1) working pump. According to the City, only one pump is adequate, as this pump station only has flow during City events. According to the City, the pump burned out due to an increase in flow, the overflow occurred during Flag Day. Approximately 10,000 people participated in Flag Day. According to the notification report, the overflow was due to a power outage (the circuit breaker tripped) and there were no potentially impacted public areas. The overflow lasted one hour and approximately 500 gallons was released.

**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 submission of a wet weather operating plan is a one time requirement that shall be done to the Department’s satisfaction once.

1. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the City’s Wet Weather Operating Plan (WWOP) was submitted to the NYSDEC in May of 2004 and the NYSDEC acknowledged its acceptability in a letter dated October 1st, 2007.
2. The City provided a letter from the NYSDEC dated April 14th, 2009, regarding a NYSDEC’s inspection. In this letter, it is written that the NYSDEC has reviewed the WWOP and it was found to be satisfactory.

3. According to the City’s LTCP (Phase I), Subsequent Requirements: Operational Plan—"The wet weather operating plan that is required in the treatment plant’s CSO Best Management Practices may be required to be updated as a result of modifications to the CSS made during the implementation of the LTCP." It is not known if the City has updated its wet weather operating plan since the most recent plant revision in 2011.

Prohibition of Dry Weather Overflow – Dry weather overflows from the combined sewer system are prohibited.

1. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, there were two (2) dry weather overflows:

   - WWTP Headworks - This was due to vandalism of the bypass pump, which was being used to bypass the bar racks during repair. The City provided a copy of the Sewage Discharge Form, which has the start time of the event as 2015-09-20 20:30:00 and the end time as 2015-09-21 06:00:00. The duration of the event was 9.5 hours and approximately 1000 gallons of sewage was spilled. The Discharge did not reach surface water. The City also provided a copy of the Report of Noncompliance for the Event which has the start date and time as 9/22/15 at 7:00 AM and the end date and time as 9/22/15 at 7:05 AM. The NY-Alert Notification was generated on 2015-09-25 11:41:20.

   - South Front Street Pump Station – The City provided the Report of Noncompliance for the event and the Sewage Discharge Form, which both have the event listed as occurring on 9/30/2015. According to these reports, the discharge was due to a faulted pump. According to the City, it was due to a Programmable Logic Controller (PLC) failure. This resulted in the wet well reaching its overflow level. As a corrective action, the City reset the tripped pump to restore the pumping flow. The duration of the discharge was 0.2 hours and approximately 100 gallons per minute was released. The Broad Street Boat Launch Area was potentially impacted. The NY-Alert notification was generated the same day as the overflow event.

2. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City wants to upgrade the Power Avenue Pump Station which will cost $250,000.

3. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, “the sewer use law clearly prohibits and identifies penalties for anyone who proposes or causes a dry weather CSO event.”

4. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the “Power Avenue pump station needs to be realized (funding dependent) as it is the primary risk for dry weather overflows.”
Control of Floatable and Settleable Solids – The permittee shall implement 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 and 5 of the Permit shall constitute approvable BMPs for mitigation of this problem.

1. According to the City, the Diversion Chamber/Manhole (CSO #003) has a bar rack to catch large objects. According to the City, the Diversion Chamber is cleaned once a year.

2. For the maintenance of the collection system, the City has a vacuum/sweeper truck and a rodding truck. According to the City, street sweeping is done five (5) times a week during warm weather.

3. According to the City, the code enforcement officer does grease trap inspections.

4. According to the City’s “Combined Sewer Overflows Long-Term Control Plan” Report, the City’s catch basins are cleaned semi-annually.

5. According to the City, a grease flier was put out a few years ago. The City also does leaf pickup and seasonal brush. There are some catch basins with hoods.

6. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the “routine cleaning of sewers, catch basins, and streets are the basis for mitigating concerns for floatables.”

7. According to the City, for backups in the main a sewer rodder will be used.

8. According to the City’s “Sewer Use Ordinance Rules and Regulations,” which is dated 2008:

   - Section 301, Waste Disposal Unlawful – “It shall be unlawful for any person to place, deposit, or permit to be deposited, in any unsanitary manner, on public or private property, within the City or in any area under the jurisdiction of the said municipality, any human or animal excrement, garbage, or objectionable waste. Also, no person shall discharge domestic Wastewater onto the surface of the ground or discharge it in a way that permits it to come to the surface of the ground.”

   - Section 902, General Prohibitions – “No user shall contribute or cause to be contributed, in any manner or fashion, directly or indirectly, any pollutant or wastewater which will interfere with the operation or performance of the WWTP.”

   (2) “Solid or viscous substances which may cause obstruction to the flow in a sewer or otherwise interfere with the operation of the wastewater treatment facilities. Unless explicitly allowable by a written permit, such substances include, but are not limited to, grease, garbage with particles greater than one-half (1/2) inch in any dimension.”
9. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City plans on implementing floatables quantification, in addition to the booming and skimming of open waters.

10. At the time of the CEI, trash was observed in the manhole close to Cross Street and South Front Street (CSO outfall 005), field work photograph 2.

**Combined Sewer System Replacement** – 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.

1. According to City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, if any portion of the combined sewer system fails, it will be replaced by separate sanitary sewers and storm sewers to the greatest extent possible.

2. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City was awarded $600,000 to separate the combined main on North Front Street. The City is in the process of preparing an Environmental Review Record (ERR) for the Housing and Urban Development (HUD). Although the City has received the grant, there has been no work to date.

3. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City has received a Green Innovation Grant Program (GIGP) grant for $275,000 to replace catch basins with tree planters. This will reduce flow by infiltration and separate remaining flows from the combine sewer system. According to the City, approximately ½ million gallons of groundwater goes into the main each day.

4. According to the City, there are approximately 2 or 3 mains that need to be repaired at the moment. This is due to the age, in addition to the piping consisting of combined sanitary flow. According to the City, any failures which occur in the piping the City does spot/patch jobs.

5. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, for the upcoming year the City plans to install an 18” storm line from the intersection of State and Green to the intersection of Green and McKinstry. This project includes migrating storm structures from the combined main to a dedicated storm system.

6. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, within the past year there were no separation of combined sewer piping. According to the report, in the upcoming year approximately 1,000 feet is scheduled to be separated.

**Combined Sewer /Extension** – Combined sewer/extension, when allowed should be accomplished using separate sewers. No new source of storm water shall be connected to any separate sanitary sewer in the collection system.
1. According to City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the “City does not intend to construct any new combined sewer extensions to supplement the existing collection system.”

2. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City plans on expanding an existing storm line on Green Street. The design plan for this project will be completed in 2016.

**Sewage Backups** – *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.*

1. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the City does not have routine discharges of raw sewage onto the ground. According to this document, if there are recurring backups at private residences, the City will work with the homeowner to either reduce the wastewater volume in the combined sewer system, through sewer separation or the City will recommend a backflow device for the homeowner’s lateral in accordance with the sewer use law.

2. According to the City, there have been backups in basements during rain events, as the elevation of the homeowner’s toilet is a few feet above the main. The City has recommended to these homeowners that a check valve should be installed.

3. According to the City, homeowners may file a notice of claim from the City for backups. However, most of the time the homeowners make a claim against the homeowner’s insurance.

4. According to the City, the overflows from the manholes are all rain related.


**Septage and Hauled Waste** – *The discharge or release of septage or hauled waste upstream of a CSO is prohibited.*

1. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the City has approval from the NYSDEC to accept septage at the wastewater treatment plant during periods of low to normal flow. The City provided a copy of a letter dated December 13th, 2007, from the NYSDEC, part of this document (attachment #3), the NYSDEC grants approval to the City to accept septage from Baldwin and Sons. According to this letter, the City’s acceptance of septage from Baldwin and Sons and J and R Contracting shall not exceed the originally approved 10,000 gallons per week.
2. At the time of the CEI, the City mentioned that it also accepts septage from Royal Flush, Superior Sanitation, County Outhouse and Fix Brothers. According to the City, all the haulers deliver residential waste. The City accepts waste from one commercial establishment, Hudson Valley Creamery for which Baldwin Brothers is the hauler.

3. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, in the past year there has not been any discharge or release of septage or hauled waste into the collection system upstream of a CSO.

**Control of Run-off** – *It is recommended that the impacts of run-off from new development in areas served by combined sewers or separate sewers be reduced by implementing practices and technologies included in the NYSDEC publication – Reducing the Impacts of Storm Water Runoff from New Development.*

1. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, any construction activities in areas with new development, the prospective developer must submit a runoff control plan in accordance with the NYSDEC publication titled “Reducing the Impacts of Stormwater Runoff from New Development.”

2. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, there is no sediment in runoff from construction zones entering catch basins in the combined sewer system. At the time of the CEI, the City was not aware of any facilities which were contributing a lot of stormwater runoff to the collection system.

**Public Notification** – *The permittee shall install and maintain identification signs at all CSO outfalls owned and operated by the permittee. The permittee shall implement a public notification program to inform citizens of the location and occurrence of CSO events.*

1. At the time of the inspection, a total of eight (8) CSO Outfall signs (002, 003, 005, 006, 007, 009, 010 and 012) were photographed. Outfalls 010, 011 and 012 are no longer in use. The outfall sign for 011 has been removed. Information on the signs include: the outfall number, permit number and the contact information for the City and the NYSDEC.

2. The City utilizes the NY- Alert System to report sanitary sewer overflow events and dry weather overflows.

**Characterization and Monitoring** – *The permittee shall characterize the combined sewer system, determine the frequency of overflows, and identify CSO impacts.*

1. According to the City’s “Maintenance and Inspection Program For Collection System Plus Best Management Practices” Report, the City has a plan which was approved by the NYSDEC to characterize and monitor the impacts of CSOs to the North Bay.
• The “plan approved by NYSDEC identified fecal coliform sampling at the archway beneath the railroad at high and low tide, during dry weather. It also identified fecal coliform sampling at active CSOs (outfalls 002, 003, 009 and 010) during wet weather plus at the railroad culvert during the follow-up low tide (when discharge from the Bay to the Hudson River is anticipated).”

• At the time of the CEI, the City was not visiting outfall 009 due to its remote location and dangers associated with snakes. The City no longer uses outfall 010.

• According to the City, the occurrence of an overflow can be determined at all the CSO outfalls, with the exception of 007 and 009 due to the remote location of these two outfalls. According to the City, outfall 007 is only visited after a wet weather event.

2. The City provided a copy of a letter from Delaware Engineering D.P.C., to the NYSDEC dated September 18, 2015, in which the City details its dry weather baseline and wet weather surface water sample analysis for Hudson River-North Bay (HR-NB). HR-NB is the receiving waterbody for CSO outfall 003 and for Underhill Pond which is the receiving waterbody for CSO outfall 006. The City’s sampling plan has been approved by the NYSDEC.

3. The City provided a copy of a letter from Delaware Engineering D.P.C., to the NYSDEC dated July 28, 2016, in which the City summarizes its dry weather baseline and wet weather surface water sample analysis for CSO outfall 003 and CSO outfall 006.

4. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City indicated that the combined sewer system has not been characterized to determine the frequency of overflows and identify CSO impacts. According to this report, the outfalls are not monitored for flow volume, for the frequency or duration of the discharge. According to this report not all of the outfalls are being monitored.

5. According to the City’s “Combined Sewer Overflows Annual Report” for 2015:

• 002 A and 002 B are the only outfalls with 24-hour monitoring (SCADA system). These are at the wastewater treatment plant.

• 005 has 24-hour monitoring of overflows from the South Front Street Pump Station. Flow is not measured at the overflow weir at Cross Street. The City uses a “tattle tail” (a wooden float tied to a rope) to determine if an overflow occurred. According to the report, outfall 005 has partial monitoring. According to the City, the elevation of the wet well at the South Front Street Pump Station will also indicate if an overflow occurred.

• According to the report, the remaining outfalls are either inaccessible or lack power/communication system to monitor. At the time of the CEI, outfall 006 had a “tattle tail” in it.
**Annual Report** – The permittee shall submit an annual report summarizing implementation of the above best management practices (BMPs).

1. The City provided its Combined Sewer Overflows Annual Report for 2015.

**III. Long Term Control Plan (LTCP)** – The permittee shall develop a Long-Term Control Plan in accordance with the Guidance For Long-Term Control Plan, EPA, September, 1995.

1. The City provided a copy of its “Combined Sewer Overflows Long-Term Control Plan.” The plan was prepared by Stearns and Wheler Environmental Engineers and Scientist and it is dated December 2003. The City’s LTCP is included in the City’s “Engineering Report for Wastewater Treatment Plant and South Front Street Pump Station.” This report was prepared by Clough Harbour & Associates LLP, and revised January 28th, 2009.

2. The City provided a copy of a letter from the NYSDEC approving its LTCP. This letter is dated April 13th, 2009.

3. According to the City’s LTCP, the average annual rainfall for the City was determined to be 35.12 inches for the years with no data gaps. The hourly rainfall for the period between 1948 to 1995 was used in the study.

4. The City incorporated a sanitary flow study, based on population information from a 1981 study. It was determined that the average dry weather flow for the City was 1.7 MGD based on the analysis of treatment plant records.

5. According to the City’s LTCP, during the City’s 1981 study, the City tried to understand the runoff relationship in the drainage areas which are tributary to CSOs 003, 005 and 006. The City installed flow meters at these overflows and they were maintained for seven months. It was found that there was a good relationship between the overflow measured and the volume predicted by the computer model of the system. According to the report, there was not much change in the land usage between the period 1981 to 2002.

6. The City’s “Combined Sewer Overflows Annual Report” for 2015, summarizes the City’s LTCP Implementation Approach. According to the report, to fulfill the EPA’s requirements for the presumptive approach, the City has made the following improvements:
   - Due to upgrades at the South Front Street Pump Station, it is now capable of conveying up to 3,500 gallons per minute (GPM) to the WWTP.
   - Improvements to the WWTP have been made to accommodate treatment of 16.9 MGD through the primary treatment process. The facility is further configured to direct 6.0 MGD to the secondary treatment process while any volumes over 6.0 MGD
up to 16.9 MGD are directed to a disinfection process and then discharged to the Hudson River.”

- Upgrades to the WWTP was completed in 2011, and a minimum of 85% of the wet weather flow is conveyed to the WWTP for primary treatment and disinfection before it is discharged. The WWTP can provide primary treatment and disinfection for all flows up to 16.9 MGD and provide secondary treatment, disinfection and solids handling for up to 6.0 MGD.

7. The City’s “Combined Sewer Overflows Annual Report” for 2015 summarizes the overflow events from two (2) CSO outfalls. According to the City, the overflow at 002 A is at the overflow contact tanks and the flow is partially treated.

<table>
<thead>
<tr>
<th>CSO Outfall #</th>
<th>No. of overflow events in the previous year</th>
<th>Total Annual CSO Volume Discharged (MG)</th>
<th>Total Annual Volume Capture or Diverted to POTW (MG)</th>
<th>How is the flow estimated or measured</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Last Period</td>
<td>This Period</td>
<td>Last Period</td>
<td>This Period</td>
</tr>
<tr>
<td>002 B</td>
<td>1</td>
<td>2</td>
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<tr>
<td>002 A</td>
<td>11</td>
<td>15</td>
<td>1.57</td>
<td>17.7</td>
</tr>
<tr>
<td>Total</td>
<td>12</td>
<td>17</td>
<td>1.57</td>
<td>17.7</td>
</tr>
</tbody>
</table>

V. Areas of Concern

1. According to the City, approximately ½ million gallons of groundwater goes into the main each day. At the time of the CEI, the City had a grant of $275,000 to replace catch basins with tree planters, thereby reducing flow by infiltration and separate the remaining flow from the combined sewer system. However, there has been no work to date. According to the City, the old stone sewers act like artesian wells and approximately 1/3 of the flow to the WWTP is from groundwater.

2. It is unknown if the City has replaced the manholes with open grates as covers with solid covers.

3. At the time of the CEI, the City had a grant of $600,000 to separate the combined main on North Front Street. However, no work has been done to date. According to the City, spot jobs/patch jobs were done to piping which needed work. As noted in the City’s permit, when “replacement of a combined sewer is necessary it shall be replaced by separate sanitary and storm sewers to the greatest extent possible.”
4. The City had a manhole overflow on 06/11/2016 which was due to the circuit breaker being tripped at the Water Street pump station. This pump station has one working pump which could not handle the increase in flow volume during Flag Day. It is unknown if the City has implemented a program, to prevent the occurrence of an overflow during Flag Day.

5. The City only uses the NY-Alert System to notify residents of sanitary sewer overflows. The NY-Alert notification for the dry weather overflow at the WWTP Headworks was submitted on 2015-09-25. The Sewage Discharge Form and the Report of Noncompliance for the Event which the City provided, list different days and time for the event.

VI. Potential Non-Compliance Issues

According to the City’s Best Management Practices For Combined Sewer Overflows:

BMP Number 1. CSO Maintenance/Inspection - The permittee shall develop a written maintenance and inspection program for all CSOs listed on page(s) 2 of the permit. This program shall include all regulators tributary to these CSOs, 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 Hudson (C) 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 snow melt, condition of equipment and work required. These reports shall be in a format approved by the Region 4 Office and submitted to the Region with the monthly operating report (Form 92-15-7).

a. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City indicated that there was no written program for the operation, inspection and maintenance of the CSS.

b. The City provided its CSO inspection records for 5/30/16 to 12/01/16 which addresses CSOs 002, 005 and 006. Based on its CSO inspection records, the City did not inspect all of its CSOs. The CSOs were not inspected weekly, and they were not inspected during both dry and wet weather conditions. The CSO inspection records were all wet weather inspections.

c. The CSO inspection records which the City provided for 5/30/16 to 12/01/16 does not indicate visual inspections, any observed flow, condition of equipment and work required.

d. At the time of the CEI, the City was not submitting its CSO inspection reports, along with its monthly operating report to the NYSDEC.
BMP Number 2. Maximum Use of Collection System for Storage—The permittee shall optimize the collection 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 Hudson (C) treatment plant. 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.

a. At the time of the CEI, the City did not have a continuous program of flushing or cleaning to prevent deposition of solids to maximize storage.

BMP Number 14. Characterization and Monitoring—The permittee shall characterize the combined sewer system, determine the frequency of overflows, and identify CSO impacts in accordance with Combined Sewer Overflows, Guidance for Nine Minimum Controls, EPA, 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.

a. According to the City’s “Combined Sewer Overflows Annual Report” for 2015, the City indicated that it had not characterized the combined sewer system, determined the frequency of overflows, or identified CSO impacts.

Field Work Photographs

1. Diversion Chamber/Manhole (CSO outfall 003)

According to the City, the diversion chamber is cleaned as needed. There is a bar rack in it which catches large debris. The metal steel plates which covers the channel has been pushed up due to a storm event. Standing on the steel plates helps the City maintain the Diversion Chamber. At the time of the CEI, the diversion chamber was last cleaned in 2015 (2 Photographs).
2. **CSO outfall 005**

This manhole is close to Cross St and South Front St. This manhole has a wooden “tattle tail” which is used to indicate an overflow event. At the time of the CEI, there was trash on the other side of the weir and an accumulation of rags on the ladder. This manhole has a 24” pipe. According to the City, outfall 005 is fed from the weir at Cross Street and the South Front Street Pump Station which never overflows (3 Photographs).

![wooden “tattle tail”](image)

3. **South Front Street Pump Station**

The Radio tower at the pump station ties into the WWTP’s SCADA system. According to the City, the wet well was cleaned approximately 1 year ago. At the time of the CEI, there was an accumulation of material on the pumps and floats in the wet well. This pump station has three pumps (2 Photographs).

![South Front Street Pump Station](image)
Control Panels at the South Front Street pump station (3 Photographs).

The South Front Street pump station has a grinder and a permanent backup generator (2 Photographs).
4. Manhole close to Broad Street and Front Street

At the time of the CEI, there was a surcharge in the manhole and there were rags on the ladder. According to the City, flow from approximately 15 restaurants flow into this manhole (1 Photograph).

5. CSO 005 Outfall Sign

According to the City, the outfall pipe is always submerged (2 Photographs).
6. **Water Street Pump Station**

This pump station has a light and audible alarm system. According to the City, this pump station is checked periodically, however it is checked more frequently during Flag Day. At the time of the CEI, this pump station did not have a lot of flow and there were no floatables or grease in the wet well. A portable generator will be used at this pump station if needed. According to the City, when the level in the wet well is approximately 10 to 12 feet high, the high level alarm will be activated (2 Photographs).

![Water Street Pump Station](image1)

![Water Street Pump Station](image2)

7. **007 Outfall sign at Power Avenue**

The outfall pipe is not visible (1 Photograph).

![Outfall sign at Power Avenue](image3)
8. **Power Avenue Pump Station**

According to the City, approximately 98% of the flow to this pump station is from the correction facility. A portable generator will be used if needed at this pump station. This pump station has a light and audible alarm system. According to the City, when the level in the wet well is approximately 12 feet high, the high level alarm will be activated (2 Photographs).

![Image of Power Avenue Pump Station]

9. **7th Street Diversion Structure/Manhole (CSO 006)**

According to the City, the wooden "tattle tail" will indicate if there is an overflow (3 Photographs).

![Image of 7th Street Diversion Structure/Manhole]

wooden "tattle tail"
10. **006 Outfall sign**

At the time of the CEI, there were tree leaves obstructing the view of the outfall. In the winter it is easier to see the outfall pipe (3 Photographs).

11. **011 Outfall at Clinton Street and Short Street**

This is an abandoned CSO, the outfall sign has been removed (1 Photograph).

12. **CSO Outfall 012 at Harry Howard Boulevard**

This outfall is no longer in use. According to the City, the discharge pipe has been capped, as well as the manhole which feeds it has been capped (1 Photograph).
13. **Mill Street Pump Station**

According to the City, this pump station only runs a couple of times per day. At the time of the CEI, the pump station ran 2.6 hours the day prior to the CEI. According to the City, approximately 15,000 gallons a day flows to this pump station. Approximately 10 homes and 2 businesses flow to this pump station. This pump station has a light and audible alarm system. The light alarm is inside the pump station. This pump station is checked every day/ seven days a week (2 Photographs).

If electricity fails at this pump station, natural gas will power the pumps (1 Photograph).
14. **009 Outfall sign and Outfall pipe**

According to the City, this pipe is approximately 36 inches in diameter (2 Photographs).

![Outfall sign and Outfall pipe](image1)

15. **Bar Screens at the WWTP**

At the time of the CEI, the bar screens at the WWTP was clean (1 Photograph).

![Bar Screens at the WWTP](image2)

16. **Overflow Contact tanks**

According to the City, the flow meters are calibrated annually (3 Photographs).

![Overflow Contact tanks](image3)
17. **CSO 003 outfall sign** (1 Photograph).

![Image of CSO 003 outfall sign]

18. **CSO 002 outfall sign** (1 Photograph).

![Image of CSO 002 outfall sign]

19. **The final metering point**

At the time of the CEI, the effluent flow was 1.12 MGD (2 Photographs).

![Image of metering point]
20. **Secondary Clarifiers**

According to the City, they are cleaned twice per year. The tanks are approximately 15 feet deep (1 Photograph).

21. **Aeration tanks** (1 Photograph).

22. **Digesters** (2 Photographs).
23. **CSO 010 Outfall Sign**

This outfall is no longer in use (1 Photograph).

24. **Permanent Backup Generator** (1 Photograph).

25. **Belt press** (1 Photograph).
26. Computer showing the WWTP’S SCADA system at the plant and representative samples of the flow coming into the plant and the flow leaving the plant (2 Photographs).

VI. Gathered Information

The City provide the following documentation:

4. Sewer Use Ordinance.
5. Long Term Control Plan.
7. City of Hudson Sewer Maps.
8. WWTP Facility Design Plan.
9. SPDES Permit Renewal Extension.
15. CSO Wet Weather Inspection report for the 7th Street manhole, Cross Street Manhole and the Overflow Contact Tanks.
20. Sewerage Discharge Form and the Report of Noncompliance Event, for the South Front Street Pump Station dry weather overflow dated 09/30/2015.
21. A letter from the NYSDEC, referencing the Engineering Report for the Wastewater Treatment Plant and South Front Street Pump Station. This is dated April 14th, 2008.

22. An email from the NYSDEC approving the City’s CSO Baseline/Wet Weather Sampling Plan.

23. A report from Delaware Engineering D.P.C., dated September 18, 2015, which details how the City plans on conducting baseline and wet weather surface water sampling.

24. A report from Delaware Engineering D.P.C., dated July 28, 2016, summarizing the baseline (dry weather) and wet weather surface water sample results.