

7. Old and New Business

A. NPDS Permit Issuance / Progress

As we were advised after meeting with DNR staff last month, HOV provided written comments on several permit related items to DNR staff in Green Bay. That letter is attached.

The public hearing is scheduled for October 15 at 9:00AM in Green Bay.

HOV was notified that our permit drafter in Green Bay is retiring and will be transitioning to retirement. He will have limited availability but intends to see thru the permits he has drafted prior to phasing out completely.

B. Leachate / Ammonia Update

9/27/18 Meeting at the landfill – Chad/Brian

We met to discuss the ongoing issues with leachate delivery to the sewer and the ammonia loading on the treatment facility. Several items were discussed to minimize the landfills impact on HOV. Main discussion centered on the following:

1. When the east landfill cell was constructed, sewer lines were put in place to allow discharge to the Appleton sewerage system. In the end that cell was routed to HOV. The landfill plans to uncover the lines and pressure test them to verify they are still sound and are usable. The tentative plan is to reconnect and direct that portion of the leachate to Appleton WWTF after DNR plan review and approval. They indicated that the East cells currently contribute about 1/3 of the leachate/ammonia loading to HOV.
2. The landfill is looking into smaller leachate pumps that will deliver leachate in the 20-30 gpm versus the 60-70 gpm that the existing leachate pumps discharge. The existing pumps are being throttled with a valve on the discharge side of the pump which is less than ideal. When implemented this change will lengthen the duration of the pumping cycles and spread out the ammonia load over a longer time frame.
3. The landfill has met with Appleton regarding the proposed Northwest landfill expansion and has been assured that Appleton has the ammonia capacity to handle their discharge. The landfill has submitted its initial site plan and operating plan to DNR for starting the review process for permitting the proposed new landfill expansion. The landfill requests that HOV would become an alternative disposal treatment facility by providing a letter for inclusion in subsequent operating plan updates to the DNR.

September 13, 2018

Dick Sachs
Wastewater Specialist
Wisconsin Department of Natural Resources
2984 Shawano Avenue
Green Bay, WI 54313

Dear Mr. Sachs:

RE: Written comment – NPDES permit WI-0031232-09-0

I am writing on behalf of Heart of the Valley MSD in discussion of the successor NPDES permit currently publicly noticed for public comment prior to reissuance. HOVMSD desires continued dialogue on several items that may create operational difficulties or lead to compliance issues once the permit is in place. Please consider the following:

Effluent Temperature Requirements

HOVMSD concerns related to the inclusion of effluent temperature requirements in section 6.4.3. As work began on drafting the necessary elements of the proposed permit, it quickly became clear that thermal limits were not going to be necessary. HOVMSD received electronic correspondence from DNR on 5/6/15 advising that HOVMSD could cease temperature monitoring and reporting as existing data made it apparent that HOVMSD was not a candidate for any sort of temperature limitation.

We are not aware of, or anticipate any changes in the effluent temperature moving into the future. HOVMSD believes there is no merit in including the language in Section 6.4.3 and requests it be struck from the permit. The DNR has section 6.4.12 language which could be used to reopen the permit in the event circumstances change due to the unforeseen.

Compliance Monitoring of Total BOD versus CBOD

HOVMSD liquid processes result in nearly complete removal of ammonia from its effluent meaning the results for CBOD5 and BOD5 are within a couple mg/L of each other. While

the annual NR 101 fees may be slightly higher in analyzing and reporting total BOD, we believe that the simplicity of the method will allow us to produce more precise data on the plant's performance. The CBOD method requires addition of an inhibitor which can be inadvertently forgotten, along with seed blanks and seed addition to individual sample bottles. These added steps and measurements to the testing protocol add to the potential for technician error resulting in lesser precision of our reported results.

HOVMSD requests permit monitoring for total BOD5 in the successor permit.

Addition of Sample Point 004 for Biosolids

Excess biosolids produced are stabilized and digested using the Autothermal Thermophilic Aerobic Digestion process that produces a Class A biosolids for beneficial reuse. HOVMSD currently has no intention of changing methods for handling its biosolids but the potential does exist where fecal contamination could be introduced to the storage tank or equipment repairs or equipment replacement may temporarily compromise the effectiveness of the ATAD process.

HOVMSD requests an Outfall be included in the permit to allow reporting Class B biosolids in the event it becomes necessary in the future.

Fecal Coliform Monitoring – Weekly Average and Blending Event Sampling

The addition of the fecal coliform weekly average limit requires more attention and effort being placed on disinfection. In the event that a sample is poorer than expected the permittee can make process adjustments and take a second or even third sample in order to meet the weekly average. That said – only if the permittee tests the effluent early in the week will time allow for resampling to meet the weekly average limit.

Sampling fecals during a blending event brings with it added work tasks and complexities during a time frame that is hectic and stressful for plant staff. We have not previously sampled for fecals when blending and are uncertain what chlorine residual is needed achieve a good fecal kill. From an Operator standpoint this unknown makes the fecal situation uncomfortable. In all likelihood HOVMSD will need to over feed hypochlorite and bisulfite solution until we learn what chlorine levels it takes to produce a compliant fecal sample. Blending events are typically few and far between and it may take some time before we can reliably predict a fecal count based on the dosage of chlorine being fed.

We offer a further scenario in objecting to blending event fecal analysis. Assuming us as a POTW collect and analyze a sample on the 8th to demonstrate compliance for week 2 (8-14). Our sample result is a typical 300 cfu/100 mls. If a wet weather event occurs on 14th requiring we pull a second fecal sample and the result is 1200 cfu/100 mls. The geometric mean would be 600 and we'd be in violation of our permit with no remaining days to retest. At some point this exact scenario will play out and an Operator will have to answer for it in addition to most likely being assessed points on the annual CMAR.

HOVMSD believes there is value in analyzing fecals during a blending event in order to fully understand the effects of a major wet weather event, however, we believe those results are not indicative of overall treatment facility performance and should not be included in the weekly average calculations determining compliance.

Thank you for considering our various concerns.

Sincerely,

Brian Helminger
District Director