

Dawn Bartel

From: Brian Helminger <brian.helminger@hvmsd.org>
Sent: Monday, July 1, 2019 8:00 AM
To: Dawn Bartel
Subject: FW: HOVMSD 6-11-19 follow up
Attachments: doc01371120190612073916.pdf

-----Original Message-----

From: Brian Helminger <brian.helminger@hvmsd.org>
Sent: Wednesday, June 12, 2019 8:13 AM
To: bruce siebers <bmsiebers@gmail.com>; Dave Casper <djc3xx@gmail.com>; John Sundelius <sundelius@kaukauna-wi.org>; kcoffey238@gmail.com; Pat Hennessey <phennessey@darboysanitary.com>
Cc: Kevin Skogman <kevin.skogman@hvmsd.org>; Dawn Bartel <dawn.bartel@hvmsd.org>; Chad Giackino <chad.giackino@hvmsd.org>
Subject: HOVMSD 6-11-19 follow up

Commissioners:

I have a couple items of follow up from the meeting last night.

I referenced the BOD loading from member communities tracked over time. Chad put the attachment with the graphs together after the annual community meeting as we anticipated further discussion on the plant capacity and increased loadings over time. As I mentioned last night, every community except Combined Locks has a best fit trend line showing over time an increased BOD loading to HOVMSD.

The other attachment relates to records retention and is in our HOVMSD WPDES permit referencing NR 204.

The following is pasted from NR204 -

NR 204.06 Reporting and monitoring requirements. The following reports shall be submitted to the department, by the permittee, annually by January 31, unless otherwise stated in this section or as specified in the permit. All records of required analyses and management practices specified in this chapter or the WPDES permit shall be retained for a minimum of 5 years. The department may modify the reporting requirements in the permit, based on size and complexity of the permittee's land application program, changes in the quantity or quality of industrial contributions to the treatment facility or when deemed necessary to ensure compliance with the provisions of this chapter.

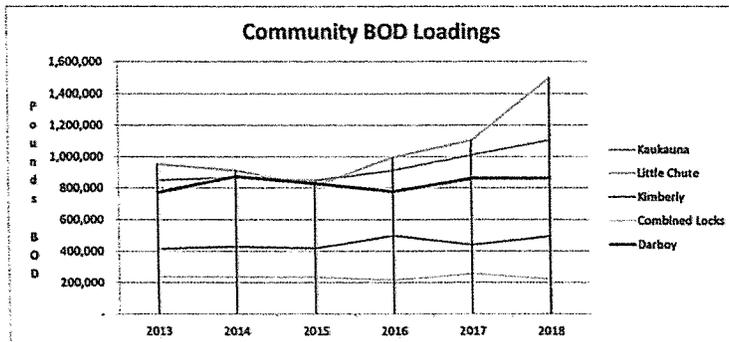
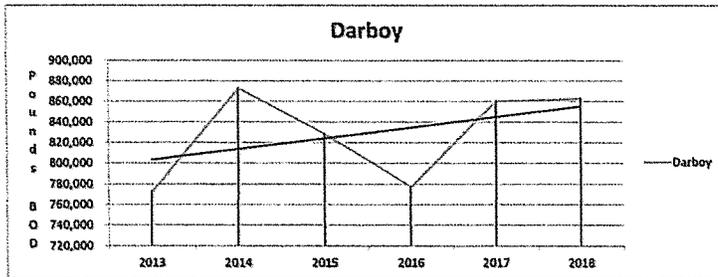
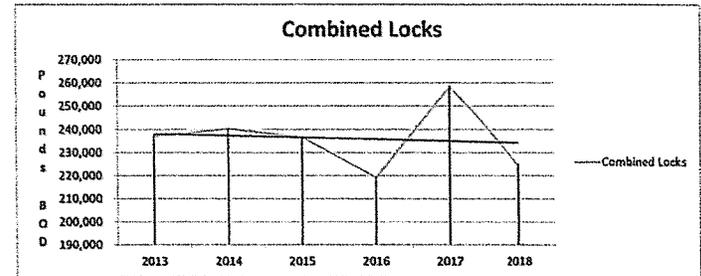
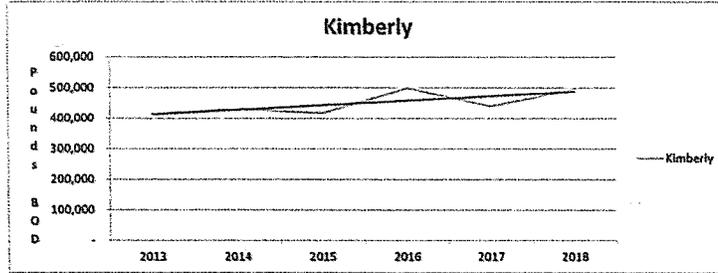
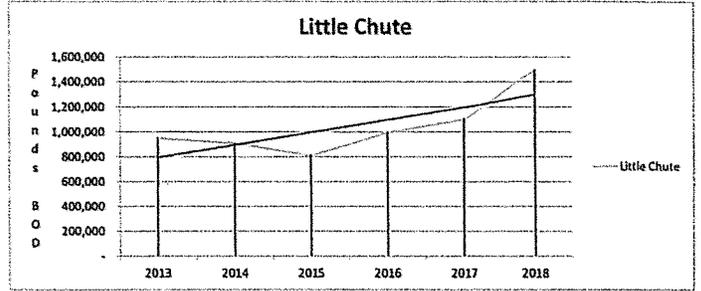
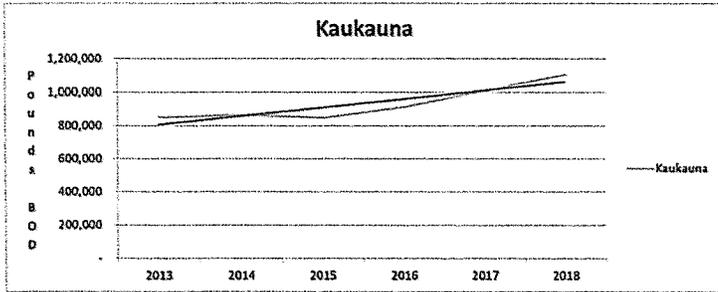
Subsection (9) Deals only with biosolids and the requirements to retain records indefinitely in the event they are land spread with metals content over the "high quality limit" or "ceiling concentration".

Flow data, lab bench sheets and the supporting materials used to complete the DMR are specified at 3 years and biosolids land application and permit application information is 5 years. Discussions this morning with staff indicate we have records going back far further than the required and we have not bumped up against space constraints in the basement. For records for the FOG program and simplicity I'd propose we adhere to, at a minimum, 5 years retention time for the FOG documentation.

Brian Helminger
District Director

Community BOD Loadings

	2013	2014	2015	2016	2017	2018	2013 vs. 2018	% Diff
Kaukauna	851,551	867,639	849,511	913,981	1,012,966	1,107,495		23%
Little Chute	952,520	911,281	813,310	998,017	1,105,170	1,500,818		37%
Kimberly	414,645	430,171	418,662	499,892	440,561	495,597		16%
Combined Locks	237,135	240,411	236,809	219,359	258,495	224,502		-6%
Darboy	772,782	873,183	828,513	777,435	860,793	862,874		10%



- the date, exact place, method and time of sampling or measurements;
- the individual who performed the sampling or measurements;
- the date the analysis was performed;
- the individual who performed the analysis;
- the analytical techniques or methods used; and
- the results of the analysis.

6.1.5 Reporting of Monitoring Results

The permittee shall use the following conventions when reporting effluent monitoring results:

- Pollutant concentrations less than the limit of detection shall be reported as < (less than) the value of the limit of detection. For example, if a substance is not detected at a detection limit of 0.1 mg/L, report the pollutant concentration as < 0.1 mg/L.
- Pollutant concentrations equal to or greater than the limit of detection, but less than the limit of quantitation, shall be reported and the limit of quantitation shall be specified.
- For purposes of calculating NR 101 fees, the 2 mg/l lower reporting limits for BOD₅ and Total Suspended Solids shall be considered to be limits of quantitation.
- For the purposes of reporting a calculated result, average or a mass discharge value, the permittee may substitute a 0 (zero) for any pollutant concentration that is less than the limit of detection. However, if the effluent limitation is less than the limit of detection, the department may substitute a value other than zero for results less than the limit of detection, after considering the number of monitoring results that are greater than the limit of detection and if warranted when applying appropriate statistical techniques.

6.1.6 Compliance Maintenance Annual Reports

Compliance Maintenance Annual Reports (CMAR) shall be completed using information obtained over each calendar year regarding the wastewater conveyance and treatment system. The CMAR shall be submitted and certified by the permittee in accordance with ch. NR 208, Wis. Adm. Code, by June 30, each year on an electronic report form provided by the Department.

In the case of a publicly owned treatment works, a resolution shall be passed by the governing body and submitted as part of the CMAR, verifying its review of the report and providing responses as required. Private owners of wastewater treatment works are not required to pass a resolution; but they must provide an Owner Statement and responses as required, as part of the CMAR submittal.

The CMAR shall be certified electronically by a responsible executive or municipal officer, manager, partner or proprietor as specified in s. 283.37(3), Wis. Stats., or a duly authorized representative of the officer, manager, partner or proprietor that has been delegated signature authority pursuant to s. NR 205.07(1)(g)2, Wis. Adm. Code. The certification verifies that the electronic report is true, accurate and complete.

6.1.7 Records Retention

The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings or electronic data records for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for the permit for a period of at least 3 years from the date of the sample, measurement, report or application. All pertinent sludge information, including permit application information and other documents specified in this permit or s. NR 204.06(9), Wis. Adm. Code shall be retained for a minimum of 5 years.