

# ITHACA AREA WASTEWATER TREATMENT FACILITY

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TOWN OF ITHACA

CITY OF ITHACA

TOWN OF DRYDEN, OWNERS

525 THIRD STREET  
ITHACA, NEW YORK 14850

(607)273-8381  
FAX (607)273-8433

9 June 2021

To Whom it May Concern,

I am the Chairperson of the Special Joint Committee (SJC) of municipal owners of the Ithaca Area Wastewater Treatment Facility (IAWWTF). Please accept our comments on the Draft TMDL for Cayuga Lake.

The IAWWTF is a 13.1 MGD facility jointly owned by the City of Ithaca, Town of Ithaca and Town of Dryden and serving four municipalities. Our municipal owners are committed to protecting Cayuga Lake and have invested over \$30 million into the IAWWTF to install state-of-the-art equipment and optimize treatment processes.

The City of Ithaca has provided comments dated June 8, 2021 and we ask that you consider our comments in tandem, as they pertain to the IAWWTF.

The draft TMDL identifies that the four permitted WWTFs in the southern end of the watershed and Cornell Lake Source Cooling are permitted to contribute up to 21.8% of the annual TP load to the southern end segment of the lake, and that point source contributions (specifically the wastewater sector) were found to be small relative to nonpoint sources. The IAWWTF's TP emissions are typically far below our permitted limit.

The IAWWTF's success over our 34-year existence in having substantially decreased phosphorus discharges into the southern end of Cayuga Lake is recognized in the draft TMDL. We have invested in state-of-the-art co-generation equipment, optimized tertiary phosphorus reduction treatment processes, and energy reduction initiatives to best maintain the health of Cayuga Lake and our community.

1. Considering the negligible TP contribution associated with the IAWWTF, and the commitment and investment made by our owners to achieve these reductions, it would be valuable to understand the goals and rationale for considering possible future requirements to add soluble reactive phosphorus (SRP) removal techniques.
2. Has DEC assessed the impacts from the Actiflo sand ballasted tertiary phosphorus removal processes instituted by the IAWWTF in 2005? Did the 2013 studies performed by Upstate Freshwater Institute in support of the Cayuga Lake Model (CLM) project assess the impacts of the upgrades? What does the CLM itself say about the impact of this significant phosphorus decrease?

The IAWWTF is being asked to monitor for SRP for two years post TMDL implementation. The results of this two-year monitoring period could be permit modifications limiting SRP in the discharge which could require additional treatment techniques and large capital investments. As part of federal rule making, the EPA includes a review of costs of new rules to help impacted parties plan and to gauge the practicability of the rule.

3. We request that DEC perform a similar analysis on the costs of both the testing and the possible treatment upgrades (based on existing treatment technologies available in the industry) as appropriate for the eight named WWTFs in the watershed.
4. We also request that this information be available for public comment prior to finalizing the TMDL.

The IAWWTF is asked to accept a 50% reduction in the currently permitted phosphorus concentration allowed in the discharge.<sup>1</sup> It is highly unusual to find out about a proposed permit modification in this manner. The normal channels would be communication directly between DEC and the permittee and be based on applicable water quality standards.

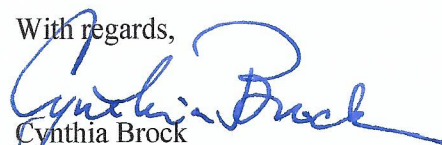
5. We request direct notification from DEC of future proposed permit modifications along with rationale for them. It is implied, but not explicitly stated, that WWTF discharge permits will be capped.
6. Will the "recommendations" of the TMDL be translated into permit modifications for these SPDES permits? Without that information, municipalities are unable to develop comments regarding potential future impacts with respect to growth.

**There is so much unknown about the impacts of the TMDL on municipal WWTF management and operations that it is impossible to assess compliance costs and impacts on growth in this sector. It is clear that the potential financial impacts could be significant.**

7. We request clarification on the structural and financial resources that will be available to municipalities to achieve the goals of TP reduction as defined in the TMDL.

There are many pressing environmental issues facing municipalities. Most are being exacerbated by climate change. How does the proposed TMDL help municipalities meet those needs while also addressing nutrient loading to Cayuga Lake?

We look forward to working with DEC to continually improve our operations and protect our natural resources.

With regards,  
  
Cynthia Brock  
Chairperson, Special Joint Committee  
Ithaca Area Wastewater Treatment Facility