

Clinton Public
Info
11/2/05

DEPARTMENT
OF ENVIRONMENT
AND CONSERVATION

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VIA TELEFAX AND U.S. MAIL

December 30, 2005
ONONDAGA COUNTY

Mr. John Clare
Department of Water Environment Protection
650 Hiawatha Blvd.
Syracuse, NY 13204

Dear Mr. Clare:

I am writing to reinforce comments I made at the November 29th public information session held at the M.O.S.T., regarding the proposed Clinton St. Regional Treatment Facility.

First, the emissions of disinfection byproducts, such as chloroform and haloacetic acids, must be fully addressed. The addition of hypochlorite to any waters containing significant quantities of organic matter--such as sewage--will produce copious amounts of these compounds. *These compounds will not break down during the dechlorination step with sodium bisulfite. In fact, the bisulfite may hasten the production of certain compounds.* The trihalomethanes (THMs), e.g. chloroform, are highly volatile, and are carcinogenic. As such, these compounds constitute a particular health risk to persons in the Armory Square area which is immediately downstream of the proposed site. When treated sewage is discharged from the RTF, it is reasonable to assume that THMs will immediately begin to volatilize from the water as it enters the creek. The creek itself will become a ground-level air source of THMs. It is essential that the risks associated with these discharges be calculated, such that a health risk assessment can be made. In addition, the impacts of non-volatile compounds, such as phenols and trihaloacetic acids, on aquatic life in the creek.

Second, serious consideration should be given to sewer separation in specific sub-basins. In particular, the Fayette St. trunk sewer seems particularly appropriate to separate, since much of the area which it serves--around Salt Springs Rd. and the area east of Westcott St.--is almost completely separated. Thus, the only area remaining to be separated is a relatively narrow strip of land between Fayette St. and Erie Blvd. The Fayette trunk intersects the M.I.S. at Franklin St., which means that complete separation of this basin would extend into downtown Syracuse. Recognizing that separation in a dense urban environment is a difficult task, I would urge the county to consider the following alternative: separate the Fayette St. basin in all areas upstream of Almond St. From Almond St. construct a separate trunk line, connecting the upstream sewershed directly into the M.I.S. The remaining area from Almond St. to Onondaga Cr. would be left as a small combined area which would overflow rarely on account of its under-utilized capacity. In other words, the Fayette basin would be split into one large completely separated basin (upstream), and one small combined basin (downtown). I would happy to provide additional details and a diagram if so requested.

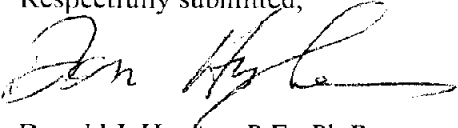
There are two major advantages to undertaking this alternative. First, it removes the need to construct a large diameter conveyance from Fayette St. along the creek, under the RR tracks to the RTF. This construction would be highly disruptive to Armory Square businesses, and is quite

expensive. Second, it reduces the amount of raw ("sanitary") sewage which is diluted with storm water. This makes for less environmental impact since this wastewater is sent to Metro for tertiary treatment, rather than receiving only partial treatment at the RTF.

Third, it appears that the Erie Blvd. Storage System is under utilized. As noted by Ms. Agnes Lane at the Nov. 29th meeting, the EBSS stores much less than it was designed for. Here, then, is an opportunity for reducing the size of the Clinton RTF. Can more of the combined sewage, or storm water which is currently directed to Clinton St. to diverted to the EBSS?

It is my sincere desire to see the best solution emerge for the CSOs along Onondaga Creek. I trust you will give my comments due consideration. If you wish to contact me, I can be reached during the day at 315-472-2150 or e-mail djhonon@verizon.net. Please note that these comments are not intended to represent the views of my employer or any specific organization.

Respectfully submitted,



Donald J. Hughes, P.E., Ph.D.