BUFFALO
SEWER AUTHORITY

SPDES Permit No. NY0028410

Long Term Control Plan Semi-Annual Status Report
Reporting Period: *July through December 2014*

Amended Administrative Order
CWA-02-2014-3033
(Amends CWA-02-2012-3024)

MARCH 2015

BUFFALO SEWER AUTHORITY

Long Term Control Plan Semi-Annual Status Report
Reporting Period: ***July through December 2014***

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1. INTRODUCTION

The Buffalo Sewer Authority (Authority) received approval of its Long Term Control Plan (LTCP) from the United States Environmental Protection Agency (USEPA) and New York State Department of Environmental Conservation (NYSDEC) on March 18, 2014. The Authority entered into an Administrative Order, as amended on April 16, 2014 (herein after referred to as the AO), with the USEPA. This AO establishes a schedule for implementation of the Authority's LTCP, approved by the USEPA and NYSDEC.

The AO in part requires that the Authority submit written Semi-Annual Status Reports to the USEPA and NYSDEC by September 1st for current year January 1– June 30 reporting period, and March 1st for the previous calendar year July 1 – December 31 reporting period. The AO requires that the following be provided in each Semi-Annual Status Report:

- The project milestones, deadlines and other terms that the Authority is required to meet since the date of the last Semi-Annual Status Report, whether and to what extent the Authority has met those requirements, and the reason for any anticipated delays and/or noncompliance.
- A general description of the work completed during the reporting period and the applicability of the work to meet indicated design criteria, as well as the projection of work to be performed during the next reporting period and any anticipated delays for the upcoming work. Any changes in key personnel must also be noted.
- Enclosure of public meeting (if held) materials including: advertisements, handouts, formal meeting notes, and a summary of the meeting.
- Copies (to USEPA only) of all monthly monitoring reports or other reports pertaining to CSOs and bypasses that BSA submitted to the NYSDEC during the reporting period.

This report covers July through December 2014, which serves as Semi-Annual Report No. 2.

2. REQUIREMENTS DUE IN REPORTING PERIOD

The following table summarizes the deadlines and other terms of the Amended AO that the BSA has been required to meet for this reporting period. The table also provides whether and to what extent the Authority has met those requirements, and the reason for any anticipated delays and/or noncompliance.

Requirement	Description	Deadline	Compliance Status
Semi-Annual Status Reports	Submit Semi-Annual Status reports no later than March 1st (reporting period July 1 through December 31 of previous year) and September 1st (January 1 through June 30 of current year)	March 1st September 1st	This report serves as the March 1, 2015 Semi-Annual Status Report submittal.

3. WORK COMPLETED IN CURRENT REPORTING PERIOD AND PROJECTION OF WORK TO BE PERFORMED NEXT REPORTING PERIOD

A general description of the work completed on LTCP projects during the reporting period (July 1 through December 31, 2014) and the work projected to be performed during the next reporting period (January 1 through June 30, 2015) is provided in Attachment A. **Work to be completed after the current or next reporting period has been grayed out.**

As agreed at October 21, 2014 meeting between the BSA and the agencies, a more detailed description of each project including the location and the goal to be achieved through each project is provided in Attachment B.

4. IMPLEMENTATION ISSUES

As noted in the previous Semi-Annual Report: on the Bird and Lang RTC Projects there were construction delays aggregating several weeks due to inclement weather, easement acquisition, submittal and fabrication delays for the actuators and stems, and a delayed radio path study.

An additional delay has occurred due to a late determination by National Grid that the existing utility poles which were to have provided power to the projects will need to be replaced due to their age (a six week process which has been further complicated by the large snow pack and frigid temperatures). Additionally, legal issues relating to obtaining an easement have necessitated rerouting of power for the Bird Avenue site between the project and the utility pole. Once these projects are energized, optimization will commence. It should be noted that the delay in completing this project is not expected to cause delays on any future projects including other RTC Projects.

In order to expedite construction, the Smith Street storage project has been separated into an in-line storage project and a partial sewer separation project. The completion of engineering for the partial sewer separation project is expected to be completed prior to the March 18, 2015 deadline set forth in the Administrative Order. The completion of the engineering for the Smith Street in-line storage project however is expected to be delayed until after March 18, 2015, but before the end of the next reporting period on June 30, 2015. Completion of construction of the overall Smith Street storage project is still expected by March 18, 2017.

5. CHANGES IN KEY PERSONNEL

Julie Barrett-O'Neill, Esq. was appointed by the BSA as General Counsel on December 8, 2014. Rosaleen B. Nogle, P.E. was appointed Associate Engineer on January 6, 2014.

6. PUBLIC MEETINGS

The BSA held a Stakeholder Panel meeting on August 7, 2014 to present the work completed since the submittal of the April 2012 Draft LTCP. Materials from this meeting are provided in Attachment C.

7. MODEL MODIFICATIONS

The process of converting the hydraulic model from XP-SWMM to PC-SWMM began during this period. To date the initial conversion has been completed with minor adjustments ongoing to account for differences in modeling techniques between the two versions. We anticipate that the model will be fully converted during the next period. Up to that point, BSA will continue to utilize the XP-SWMM model. Additionally, as projects progress and new field survey data is collected (e.g., weir elevations), the model will be updated with the new information and documented in the Semi-Annual Status Reports.

8. CERTIFICATION STATEMENT

"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 gather and evaluate 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."

David P. Comerford, General Manager

2/27/15
Date