Executive Director
Thomas W. Sigmund, P.E.
Commissioners
Kathryn Hasselblad, President
James Blumreich, Secretary
Thomas P. Mertz, Vice President
Mark D. Tumpach, Vice President
Lee D. Hoffmann, Vice President

NEW Water
The brand of the Green Bay Metropolitan Sewerage District

August 18, 2021

VIA EMAIL: gross.louise@epa.gov
Ms. Louise C. Gross
Associate Regional Counsel
U. S. Environmental Protection Agency
77 W. Jackson Blvd. (C-14J)
Chicago, IL 60604

RE: Response to July 15, 2021 Follow Up Information Request

Dear Ms. Gross:

The purpose of this letter is to submit the information that you requested from NEW Water, the brand of the Green Bay Metropolitan Sewerage District (GBMSD), via email on July 15, 2021. The responses to your follow up questions are below:

From Question 1:

EPA Question: Why isn't the 8.4" wc alarm shown in the table?

NEW Water Response: The 8.4" was not included in the table as it was added by NEW Water as an alert notification to operating staff of an increase in differential pressure.

EPA Follow up Question: What is an "alert notification" in this context? Is it a visual alarm that appears on the operator's display? Also, is there some reason that NEW Water cannot or is reluctant to include this alarm in the table?

NEW Water Follow up Response: An alert notification is a visual indicator that displays on the plant's computer control system (SCADA).

NEW Water will add this alert notification to the table.

From Question 2:

EPA Question: How were the in-bed temperature monitor alarm thresholds established?

NEW Water Response: Recommendation from the incinerator system manufacturer.

EPA Follow up Question: Does NEW Water mean that the GAC manufacturer made the recommendation?

Green Bay Metropolitan Sewerage District
2231 North Quincy Street | Green Bay, WI 54302 | Phone (920) 432-4893 | Fax (920) 432-4302 | www.newwater.us

NEW Water Follow up Response: No. SUEZ, the incineration system manufacturer and supplier, recommended the alarm thresholds.
NOTE: NEW Water's contractual obligation was with SUEZ, the incineration system manufacturer and supplier, who had overall responsibility of the system. CPPE, the GAC manufacturer, was a subcontractor to SUEZ.

From Question 5:

EPA Question: Is there an alarm for the 45°F dT?

NEW Water Response: No. The system is designed to maintain a minimum differential temperature of 45°F over 12-hour block average.

EPA Follow up Question: Even when a system is designed to operate a certain way, sometimes something can go wrong, and a deviation can occur. What would happen if the 12-hour block average temperature differential is measured to be less than 45°F? According to the "GAC Parameter Interlocks and Responses" table, nothing is done. This is unacceptable, as the minimum dT of 45°F was requested by GBMSD (as recommended by the GAC manufacturer) and approved by EPA on 8/1/2018.

Some type of alarm/interlock system needs to be implemented by NEW Water to prevent the violation of the 45°F minimum dT.

NEW Water Follow up Response: NEW Water has added a six (6) hour rolling average alert notification via the SCADA system to help prevent a potential violation. This will alert the Operators if the average differential temperature is approaching the 45°F limit and will provide time for the Operators to make corrections prior to the 12 hour average permit limit.

EPA Question: How was 15°F trigger dT established?

NEW Water Response: Recommendation from the incinerator system manufacturer.

EPA Follow up Question: Does NEW Water mean that the GAC manufacturer made the recommendation?

NEW Water Follow up Response: No. SUEZ, the incineration system manufacturer and supplier, recommended this alarm threshold.

From Question 6:

EPA Question: Also, describe how the trigger value was determined.

NEW Water Response: Recommendation from the incinerator system manufacturer.

EPA Follow up Question: Does NEW Water mean that the GAC manufacturer made the recommendation?

NEW Water Follow up Response: No. SUEZ, the incineration system manufacturer and supplier, recommended this alarm threshold.

Please feel free to contact me by email (tsigmund@newwater.us) or phone (920-438-1095) with any questions or concerns you may have.

Sincerely,

GREEN BAY METROPOLITAN SEWERAGE DISTRICT

Thomas W. Sigmund

Thomas W. Sigmund, P.E.
Executive Director

cc via email: Mr. Dan Schaufelberger, US EPA
Mr. James Bonar Bridges, Wisconsin DNR
Ms. Tania Taff, Wisconsin DNR