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Department of Utilities
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To: Chairperson Joe Martin and Members of the Utilities Committee

From: Robert Kennedy, AWWTP Operations Supervisor

Cc: Chris Shaw, Director of Utilities
Paula Vandehey, Director of Public Works
Dean Gazza, Director of Facilities and Maintenance
Mayor Tim Hanna

Date: June 10, 2014

Re: *Request Approval of the electronic Compliance Maintenance Annual Report (eCMAR) for 2013 and Request Resolution be Presented to Common Council for Approval*

State of Wisconsin Code NR 208 mandates an annual assessment of the wastewater utility known as the electronic Compliance Maintenance Annual Report (eCMAR). Requirements under NR 208 are enforceable through the facility's Wisconsin Pollutant Discharge Elimination System permit. This regulation has four objectives: assuring consistency with other rules; expanding application of the rule to sanitary sewer collection system operation and maintenance; improving the compliance maintenance rating system; and improving the quality and ease of reporting through electronic data management integration. The 2013 eCMAR is required to be submitted to the Department of Natural Resources (DNR) by June 30, 2014.

Attached is the 2013 eCMAR summary, which will be submitted electronically to the Wisconsin Department of Natural Resources after the Utilities Committee and Common Council approve the resolution cited in the agenda with this attachment. Each eCMAR category was letter graded (A, B, C, D, or F) based on regulatory criteria. The categories are then combined and an overall treatment works grade point average was determined for 2013. Responses are required for categories with grades at or below a "C" or for an overall grade point average less than 3.0.

The overall letter grade for the 2013 eCMAR is an A with a grade point average of 3.86. Eight of the nine categorical grades for the facility were excellent or A. There was only one category with a B grade: Biosolids Quality and Management. The Biosolids Quality and Management section B grade was the result of the facility not having the necessary 180 days of storage capacity required under NR 204. The wastewater plant did maintain 167 days of biosolids storage for 2013.

Issues of biosolids storage capacity continue to be addressed by the Utilities Department. A capital project for a building expansion or a compost facility has been identified for 2017. AWWTP staff are currently engaged in a large scale compost pilot that is field testing composting biosolids with city generated yard wastes. The composting is occurring at the Outagamie County Department of Solid Waste location. The City will be addressing the storage requirement in the reissuance of the AWWTP's WPDES permit. If the pilot compost facility is regulatory defined as a WDNR permitted compost facility the site can be considered storage. This increase in storage would improve the eCMAR grade to an A for biosolids storage.

Overall, the 2013 Compliance Maintenance Annual Report reflects sound utility planning and operations. I would like to credit the Utilities Committee and Council for continued investment in our wastewater facilities, Wastewater Staff for their work in achieving a fine maintenance and compliance record, the Department of Public Works for collection system engineering and maintenance, and Facilities Management for maintaining our buildings and grounds.

I recommend approving the 2013 eCMAR and the Common Council resolution in support thereof. If you have any questions concerning the 2013 eCMAR please contact Robert Kennedy at 832-2349.