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Department of Utilities
Wastewater Treatment Plant
2006 E Newberry Street
Appleton, WI 54915
920-832-5945 tel.
920-832-5949 fax

To: Chairperson Greg Dannecker 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 Parks, Recreation and Facilities Management
Mayor Tim Hanna

Date: June 7, 2016

Re: *Request Approval of the electronic Compliance Maintenance Annual Report (eCMAR) for 2015 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 2015 eCMAR is required to be submitted to the Department of Natural Resources (DNR) by June 30, 2016.

Attached is the 2015 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 2015. 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 2015 eCMAR is an A with a grade point average of 3.73. Nine of the ten categorical grades for the facility were graded as excellent or A. There was one categories with a C grade: Biosolids Quality and Management.

The Biosolids Quality and Management section C 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 149 days of biosolids storage for 2015.

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 in the five year capital plan. AWWTP staff is currently engaged in a large scale pilot that is field testing composting biosolids with city generated yard wastes. The composted product has the potential for outlets year round that would effectively reduce the Class B biosolids building storage needs. WDNR re-issuance of the AWWTP WPDES permit is expected to address inclusion of the compost facility as storage, and provide ample acreage to achieve a section grade of A.

Overall, the 2015 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 2015 eCMAR and the Common Council resolution in support thereof. If you have any questions concerning the 2015 eCMAR please contact Robert Kennedy at 832-2349.