

**DRAFT SCOPE**

Adopted for Public Review:

August 6, 2020

**Orange County Sewer District #1  
Harriman Wastewater Treatment Plant  
Longevity Improvements & Capacity Expansion**

*SEQRA Type 1 Action*

Lead Agency:

County of Orange  
255 Main Street  
Goshen, NY 10924

Contact:

Erik Denega, P.E.  
Commissioner  
Environmental Facilities and Services  
2455-2459 Route 17M  
Goshen, NY 10924

Public Scoping Session:

September 3, 2020; 2:00 PM  
Orange County Government Center  
Legislative Chambers  
3<sup>rd</sup> Floor  
255 Main Street  
Goshen, New York 10924

To the extent the public scoping session will be held via videoconference, instructions to access the virtual meeting will be made available on the Orange County Legislature's website [www.orangecountygov.com](http://www.orangecountygov.com) prior to September 3, 2020

Direct written comments to:

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Erik Denega, P.E.  
Commissioner  
Environmental Facilities and Services  
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Goshen, NY 10924

Written Comments Accepted until September 14, 2020

# **Orange County Sewer District #1 Harriman Wastewater Treatment Plant Longevity Improvements & Capacity Expansion**

## **Environmental Impact Statement**

### **Draft Scoping Document**

## **INTRODUCTION**

The Orange County Sewer District # 1 (OCSD #1) intends to conduct Longevity Improvements as well as Capacity Expansion of the Harriman wastewater treatment plant (WWTP). The project is anticipated to include improvements to extend the useful life of aging equipment and unit processes, and to expand treatment capacity from 6.0 MGD to 9.0 MGD.

Part I of the Long Environmental Assessment Form (EAF) was prepared together with a Draft Facility Plan outlining existing conditions, alternative improvement options, and recommendations. Based on a review of 6 NYCRR Part 617.4, the project is an Unlisted Action; however, the County of Orange intends to seek state and federal financing to support project costs and therefore, the project has been determined to be a Type I Action under SEQRA involving more than one agency thus requiring coordinated agency review.

A coordinated review for Lead Agency status was initiated by the County of Orange on May 7, 2020, and on August 6, 2020, the County of Orange, having received no objections from involved agencies, declared itself Lead Agency for this project.

The County of Orange reviewed Part 1 of the Long EAF and the Draft Facility Plan, and completed Part 2 of the EAF resulting in a Positive Declaration as a Determination of Significance embodied in Part 3 of the EAF adopted on August 6, 2020.

Review of Parts 1 and 2 of the Long EAF indicates that small impacts may occur with respect to flooding, plants and animals, energy, and human health. In addition, moderate to large impacts are indicated due to construction lasting for more than one-year, potential water quality impacts, expansion of an existing wastewater treatment facility, and the potential for odors.

With respect to small impacts, the site of the existing treatment plant is located in the 100- and 500-year floodplains and the site is located over or adjoining the principal and sole source Ramapo aquifer. However, the design standards mandate that the vital components of the treatment are located above flood levels and that the aquifer is protected from spills or releases of untreated sewage. As a result, no significant impacts on flooding or the aquifer are anticipated. The area in the vicinity of the wastewater treatment plant may host northern long-eared bats; however, the wastewater treatment plant site is clear of all trees and does not provide habitat for bats. As a result, no impacts to plants or animals are anticipated. The improvements and expansion of the treatment plant will increase power use but not to significant thresholds; however, improvements to power supplies may be required. Notwithstanding, such improvements are not anticipated to have a significant impact on existing power generation and supply

systems. Lastly with respect to small impacts, the wastewater treatment plant site is within 2000 feet of a site in the NYSDEC Environmental Site Remediation database; however, ground disturbance for the project will not occur near or within the site; therefore, no significant impacts to human health with respect to existing contamination are expected.

Moderate to large environmental impacts have been identified in Part 2 of the EAF with respect to multi-year construction, potential water quality impacts, expansion of the treatment plant and the potential for odors. Given the scale of the longevity and expansion construction at the treatment plant, construction is anticipated to last at least 18 months, if not two years. The need to maintain operations during construction adds complexity and requires careful consideration. The project as contemplated will require the issuance of a variance to effluent limitations based on standards and guidance values as outlined in 6 NYCRR Part 710.17. Thus, potential water quality impacts may be anticipated and require careful study. The project involves the expansion of an existing wastewater treatment as well as improvements to extend the useful life of the existing facilities, considered longevity improvements. The impacts of expansion of the treatment plant requires consideration. Lastly, the existing facility at times has emitted odors as a byproduct of routine operations. An expansion to the treatment plant risks continued or additional odors that must be evaluated and for which mitigation measures documented.

As a result of the potential environmental impacts identified as moderate to large, a Positive Declaration was adopted.

The Environmental Impact Statement will be prepared in accordance with Article 8 of the New York Environmental Conservation Law, the State Environmental Quality Review Act (SEQRA or SEQR) and the implementing regulations incorporated in 6 NYCRR Part 617. This scoping document outlines the issues to be studied based on those identified in the Positive Declaration and analyzed to identify potential environmental impacts and appropriate mitigation measures.

## **GENERAL CONSIDERATIONS**

The Draft EIS will be prepared to document the environmental review of the proposed action and to seek comments and input from the public and involved and/or interested agencies. The Draft EIS will present analysis of the potentially significant adverse and beneficial environmental impacts of the proposed action, as well as reasonable alternatives and mitigation measures. While alternatives will be identified and evaluated, the emphasis of the Draft EIS is the preferred alternative.

Once a Draft EIS is prepared, SEQRA provides that the lead agency evaluates the Draft EIS and determine if it is complete for public and agency review. With the Draft EIS deemed complete, a comment period extending a minimum of 30 days shall be initiated. During the comment period, the public and involved and/or interested agencies are encouraged to provide comments regarding the Draft EIS. A public hearing may be held to facilitate public comment. At the conclusion of the comment period, the lead agency will prepare a Final EIS which will incorporate the Draft EIS by reference together with responses to the comments. The final step in the process is the issuance of a Findings Statement by the lead agency. The Findings Statement will document the environmental analysis in summary form and set forth specific conditions or criteria under which future actions will be undertaken or approved.

## SCOPE OF EIS

### COVER SHEET

The Draft EIS will contain a document cover that presents a project title, list of document authors and contacts, the name of the Lead Agency and a contact, the project location, SEQRA status and relevant dates (i.e. date of acceptance by the Lead Agency, date by which comments must be received, date of public hearing and final date of acceptance).

### 1.0 EXECUTIVE SUMMARY

This section will describe the environmental review process and will include a brief description of proposed plan and related actions, the potentially required local, County, State, and Federal approvals and permits, project benefits, a summary of impacts and mitigation measures as well as a brief comparison of alternatives.

### 2.0 DESCRIPTION OF THE PROPOSED ACTION

The Description of the Proposed Action will include as appropriate narrative and graphic depictions of the action as proposed. For purposes of scoping, the following project description is provided.

The project is envisioned to include new mechanical screening, vortex grit unit and flow splitter with odor control housed in a new building constructed adjacent to the existing headworks building. A new chemical feed and backwash filter pump buildings will be constructed.

Trains 1 and 2 will be converted to sequencing batch reactors (SBR) capable of treating a 7.0 MGD while Train 3 will be subject to aeration basin upgrades to remain at 2.0 MD for a total of 9.0 MGD treatment capacity. Existing Train 1/2 tertiary treatment will be upgraded as needed to meet regulatory requirements.

Existing structures will be demolished or re-purposed as necessary to provide facilities necessary to meet regulatory requirements. Modifications to the sludge holding tanks will be conducted to add blowers, aeration piping, coarse bubble diffusers, tank covers, sludge pumps and odor control. Chlorine contact, post aeration, SCADA and appurtenant upgrades will be conducted.

In addition, the project may include upgrades to the main building supply air, odor control, and HVAC improvements; remote pump station replacement; decommissioning of several collection system pump stations; magnesium hydroxide chemical feed/mixing system; Train 1 air supply line rehabilitation; misc. concrete work; MCC1 switch gear and Train 1 secondary weir replacement and Train 1 & 3 secondary covers.

Permitting for the expansion from 6.0 MGD to 9.0 MGD will require issuance of a variance for certain State Pollutant Discharge Elimination System (SPDES) parameters that cannot be met due conditions that prevent the attainment of standard or guidance values which cannot be remedied as the solution would cause more environmental

damage to correct than to remedy. Additionally, attainment of standard or guidance values would result in widespread economic and social impacts.

## **2.1 Project Purpose, Need and Benefit**

This section will identify the history and background for the proposed action together with the economic and social benefits associated with the action. Existing conditions of aging equipment and unit processes as well as demands for increased treatment capacity and regulatory requirements will be described.

### ***2.1.1 Purpose and Need***

### ***2.1.2 Regulatory Requirements***

## **2.2 Location**

This section will describe in narrative form as well as graphically the location of the WWTP.

## **2.3 Concept Plan for Capital Improvements**

This section will describe the conceptual improvements to the WWTP based on the Draft Facility Plan previously prepared. This section will describe existing conditions and proposed improvements as well as regulatory requirements.

### ***2.3.1 Existing Conditions***

### ***2.3.2 Proposed Improvements***

### ***2.3.3 Regulatory Requirements***

## **2.4 Operations**

The Operations section of the Draft EIS will describe existing operational conditions, construction sequencing to maintain operations during construction, and operations upon completion of the project.

### ***2.4.1 Existing Conditions***

### ***2.4.2 Proposed Improvements***

### ***2.4.3 Regulatory Requirements***

## **2.5 Construction**

The anticipated phasing of construction, schedule, location of staging areas, hours of construction operations, construction vehicle routing and access will be discussed.

## **2.6 Permits and Approvals**

The permits and approvals that are anticipated for the proposed action will be enumerated in this section.

### **3.0 ENVIRONMENTAL SETTING, POTENTIAL IMPACTS AND MITIGATIONS**

This section of the Draft EIS will describe the existing environmental setting in general and specifically regarding the project. Aspects of the environment that may be either adversely or beneficially impacted by the proposed action will be identified and discussed. Where potential negative impacts are identified, mitigation measures will be described to reduce or avoid those impacts. Construction as well as non-construction impacts will be analyzed together with impacts from the operational phase of the project.

For this environmental review, existing conditions are presented in Section 3.1 for relevant areas followed by discussion of impacts and mitigation measures in Section 3.2 for each area.

#### **3.1 Existing Conditions**

##### **3.1.1 Topography, Geology and Soils**

Section 3.1.1 will describe the regional setting of the WWTP as well as the topography, surface and subsurface geology and soils on the WWTP site and provide specifics for the project site.

##### **3.1.2 Groundwater Resources**

This section will describe groundwater resources in the vicinity of the WWTP focusing on current conditions of groundwater as it relates to regulatory standards.

##### **3.1.3 Surface Water Resources**

Surface water resources in the vicinity of the WWTP will be described including but not limited to the Ramapo River, tributaries and associated wetlands. Classification of the water bodies as well as regulatory concerns will be discussed.

##### **3.1.4 Neighborhood and Community**

The EIS will describe the existing neighborhood and community in the vicinity of the WWTP and identify existing conditions with respect to noise, light, truck traffic and odor.

##### **3.1.5 Energy Consumption**

This section will describe the existing consumption of energy by the WWTP on a unit process basis.

##### **3.1.6 Residuals Management**

The WWTP generates residuals that require treatment and disposal. Existing processes and conditions with respect to residual management will be described.

## **3.2 Potential Impacts and Mitigation Measures**

### **3.2.1 Topography, Geology and Soils**

Section 3.2.1 will describe potential impacts of the WWTP improvements with respect to topography, surface and subsurface geology and soils on the WWTP site and provide mitigation measures as appropriate.

### **3.2.2 Groundwater Resources**

This section will describe the manner in which the WWTP project may impact groundwater resources in the vicinity of the WWTP and describe mitigation measures to reduce negative impacts, if any.

### **3.2.3 Surface Water Resources**

Surface water resources in the vicinity of the WWTP will be impacted by the project and this impact will be described relative to the Ramapo River, tributaries and associated wetlands. Classification of the water bodies as well as regulatory concerns will be discussed relative to impacts and mitigations. Permitting for the expansion from 6.0 MGD to 9.0 MGD will require issuance of a variance for certain State Pollutant Discharge Elimination System (SPDES) parameters that cannot be met due conditions that prevent the attainment of standard or guidance values which cannot be remedied as the solution would cause more environmental damage to correct than to remedy. Additionally, attainment of standard or guidance values would result in widespread economic and social impacts.

### **3.2.4 Neighborhood and Community**

The EIS will describe the potential impacts to the neighborhood and community in the vicinity of the WWTP and identify mitigation measures with respect to noise, light, truck traffic and odor.

### **3.2.5 Energy Consumption**

The EIS will describe the power consumption as a result of conducting the project and discuss mitigation measures such as high efficiency motors and variable speed drives.

### **3.2.6 Residuals Management**

Improving effluent water quality will generally result in increased residuals management needs which will be discussed relative to this project in terms of methods to improve efficiency as mitigation measures.

### **3.2.7 Climate Change**

This section of the EIS will describe to the extent applicable, measures to avoid or reduce the WWTP project's impact on climate change and the effects of climate change due to sea level rise and flooding.

#### **4.0 Unavoidable Impacts**

This section will identify the unavoidable impacts of the WWTP in its context in terms of neighboring land uses and the receiving water. Permitting for the expansion from 6.0 MGD to 9.0 MGD will require issuance of a variance for certain State Pollutant Discharge Elimination System (SPDES) parameters that cannot be met due conditions that prevent the attainment of standard or guidance values which cannot be remedied as the solution would cause more environmental damage to correct than to remedy. Additionally, attainment of standard or guidance values would result in widespread economic and social impacts. The unavoidable impacts of such an action will be described in the overall context of water quality in the region.

#### **5.0 Alternatives**

The Draft Facility Plan incorporates a number of Alternatives to the Preferred project plan which will be described in detail in this section together with benefits and drawbacks of each, including:

##### **5.1 *No Action Alternative***

Drawing on the description of existing conditions, this section will describe the impacts of No Action relative to the Harriman WWTP. The existing SPDES permit for the treatment plant cannot be met without improvements, which are mandated in that permit. As a result, while a No Action Alternative will be discussed, it is not a viable option.

##### **5.2 *Alternative for Longevity Improvements Only***

In the absence of the need to provide additional treatment capacity, an Alternative exists to invest in the WWTP to meet current permit objectives with the exception of those for which a variance is sought without increasing the capacity. This section will describe the Longevity Improvements as a stand-alone alternative.

##### **5.3 *Alternative Technology Approaches to Achieve 9.0 MGD***

Assuming the objective is to meet near term needs for additional capacity, a review of various alternative technologies that could achieve a 9.0 MGD discharge in conformance with permit limits except those for which a variance is sought will be provided in this section.

##### **5.4 *Regional Alternatives***

In the preparation of the Draft Facility Plan, a number of Regional Approaches to additional treatment capacity were identified and will be outlined in this section. The benefits and drawbacks of these approaches will be described to allow comparison to the Preferred Alternative.

#### **APPENDICES**

The Appendices of the Draft EIS are envisioned to be drawn largely from the Draft Facility Plan and other related studies and reports to support the environmental review discussed in the main text of the Draft EIS.