Combined Sewer Overflow (CSO) Annual Report

version 1.11

(Submission #: HQ9-BZ7C-BERY5, version 1)

Details

Submitted	1/31/2025 (0 days ago) by Rosaleen B Nogle
Alternate Identifier	NY0028410
Submission ID	HQ9-BZ7C-BERY5
Status	Deemed Complete

Form Input

Permit Information

SPDES Number
NY0028410

DEC Region
9

Permittee Name
Buffalo Sewer Authority

Facility Name
Bird Island Sewage Treatment Plant

Official Name
Rosaleen B. Nogle

Official Title
Principal Sanitary Engineer

Official's Phone Number
7168514664

Official's Email Address
rnogle@buffalosewer.org

CSO Program Manager Name
Rosaleen B. Nogle

CSO Program Manager Title
Principal Sanitary Engineer

CSO Program Manager Phone Number
7168514664

CSO Program Manager Email
rnogle@buffalosewer.org

Part I - CSO LTCP Information

GENERAL CSO PROGRAM INFORMATION

Use the following questions to provide current general information on the CSO Program

Number of CSO Outfalls in the permittee owned system
52

Number of CSO Events Occurring in Reporting Year
35

Total Volume of CSO Discharged in Reporting Year (MG)
1,447.82

Percentage of Collection System, owned by the permittee, that is combined (%)
97

Approximate length (mi) of combined sewers in permittee-owned system
844

Population served by the permittee-owned system
276,486

Number of Publicly-Owned Sewer Systems (POSS) to the permittee-owned system
5

Number of Publicly-Owned Sewer Systems (POSS) to the Combined Sewer System
5

Number of Significant Industrial Users (SIU) connected to the CSS
49

Number of other, non-POSS satellite system connections
0

Long Term Control Plan (LTCP) Information

Was an LTCP Required?
Yes

Year the LTCP was Submitted
2013

What is the LTCP Approval Status?
Approved

What was/is the LTCP selected approach and/or criterion?
Presumptive (4-6 Events)

Is the LTCP Implementation completed?
No

Provide a brief list of all the recommendations and CSO controls to be implemented under the Long-Term Control Plan. Be sure to identify the year these items were completed and any remaining milestones dates not yet achieved.
LTCP includes weir raising, floatable control facility, relief tunnel, in-line, pumping station upgrades, off-line storage facilities & GI. For progress through 7/1/2024 see the 9/1/2024 Semi-Annual LTCP located at: https://buffalosewer.org/about/transparency. In 2024, operation of the Mill Race RTC began; the Black Rock Canal & Scajaquada Creek RTC and Primary Phase A projects have begun construction in 2024. BSA continues to advance plans and specifications for the design of the Breckenridge CSO, several SPP Modifications, the Sidney at Lark RTC and the Martha at Ediston RTC. Throughout 2023 BSA, EPA, NYSDEC, USDOJ and the NYS Attorney General's Office have been in regular communication regarding an updated LTCP.

Post Construction Compliance Monitoring (PCCM)

What is the status of the PCCM Plan?
Not Yet Required

What is the status of the PCCM Sampling Program?
Not Yet Required

Part II - CSO Outfall Information

CSO Outfall Information

Outfall Number	Latitude (Decimal)	Longitude (Decimal)	Receiving Water Name	Receiving Water Class	Number of Regulators Associated	Type of Regulator	Type of Treatment Provided	Number of Overflow Events - BASELINE	Number of Overflow Events - PREVIOUS YEAR	Number of Overflow Events - CURRENT YEAR	Annual CSO Volume (MG) - BASELINE	Annual CSO Volume (MG) - PREVIOUS YEAR	Annual CSO Volume (MG) - CURRENT YEAR	Measurement Method
003	42.9373	-78.9072	Black Rock Canal	C	11	Fixed Weir	None	6	8	4	0.11	4.01	1.76	Modeled
004	42.9261	-78.9055	Black Rock Canal	C	1	Fixed Weir	None	5	10	4	11.25	15.09	5.96	Modeled
005	42.9243	-78.8991	Black Rock Canal	C	2	Elevated Pipe	None	4	0	0	0.08	0.00	0.00	Modeled
006	42.9223	-78.8996	Black Rock Canal	C	7	Fixed Weir	None	65	23	14	198.9	42.52	18.51	Modeled
007	42.9222	-78.8997	Black Rock Canal	C	1	Fixed Weir	None	0	6	2	0.00	0.83	0.26	Modeled
008	42.209	-78.9002	Black Rock Canal	C	1	Fixed Weir	None	39	0	0	6.11	0.00	0.00	Modeled
009	42.919	-78.901	Black Rock Canal	C	1	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
010	42.9174	-78.9013	Black Rock Canal	C	1	Fixed Weir	None	44	21	15	11.85	14.56	7.09	Modeled
011	42.9133	-78.9032	Niagara River	SA	1	Fixed Weir	None	41	45	29	134.30	320.95	177.02	Modeled
012	42.9132	-78.9017	Black Rock Canal	C	1	Fixed Weir	None	42	39	27	52.48	101.46	49.46	Modeled
013	42.889	-78.8935	Black Rock Canal	C	1	Fixed Weir	None	7	8	4	6.75	9.34	4.55	Modeled
014	42.8846	-78.8888	Erie Basin Marina	C	2	Fixed Weir	None	4	15	6	4.19	42.00	16.59	Modeled
015	42.8813	-78.8849	Erie Basin Marina	C	2	Fixed Weir	None	12	0	0	6.14	0.00	0.00	Modeled
016	42.8769	-78.8841	Erie Basin Marina	C	2	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
017	42.8769	-78.8796	Buffalo River	C	20	Elevated Pipe	Screening Only	49	28	16	71.26	220.08	102.44	Modeled
022	42.8724	-78.8737	Buffalo River	C	4	Fixed Weir	None	49	11	5	29.79	2.96	1.18	Modeled
023	42.8666	-78.8680	Buffalo River	C	1	Fixed Weir	None	0	5	2	0.00	0.74	0.26	Modeled
025	42.8639	-78.8605	Buffalo River	C	1	Fixed Weir	None	11	8	4	1.44	3.46	1.53	Modeled
026	42.8631	-78.8508	Buffalo River	C	45	Fixed Weir	None	63	19	10	124.16	127.50	70.64	Modeled
027	42.4631	-78.8375	Buffalo River	C	1	Fixed Weir	None	36	20	11	31.67	128.40	55.82	Modeled
028	42.8603	-78.8325	Buffalo River	C	7	Fixed Weir	None	69	43	28	45.54	32.53	17.34	Modeled
029	42.8603	-78.8325	Buffalo River	C	3	Fixed Weir	None	0	10	4	0.00	7.58	2.84	Modeled
031	42.8599	-78.8244	Cazenovia Creek	C	1	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
032	42.8616	-78.8260	Buffalo River	C	1	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
033	42.8624	-78.8254	Buffalo River	C	5	Fixed Weir	None	9	28	15	37.77	171.60	76.20	Modeled
035	42.8502	-78.8087	Cazenovia Creek	B	2	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
037	42.8521	-78.8112	Cazenovia Creek	C	1	Fixed Weir	None	13	12	5	23.30	19.38	8.06	Modeled
038	42.8526	-78.8111	Cazenovia Creek	C	3	Fixed Weir	None	0	1	2	0.00	0.27	0.21	Modeled
039	42.8533	-78.8126	Cazenovia Creek	C	1	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
040	42.8539	-78.8126	Cazenovia Creek	C	1	Fixed Weir	None	0	1	0	0.00	0.00	0.00	Modeled
042	42.8550	-78.8141	Cazenovia Creek	C	3	Elevated Pipe	None	0	1	0	0.00	0.00	0.00	Modeled
044	42.8573	-78.8183	Cazenovia Creek	C	4	Fixed Weir	None	7	4	4	2.32	3.29	1.71	Modeled

Outfall Number	Latitude (Decimal)	Longitude (Decimal)	Receiving Water Name	Receiving Water Class	Number of Regulators Associated	Type of Regulator	Type of Treatment Provided	Number of Overflow Events - BASELINE	Number of Overflow Events - PREVIOUS YEAR	Number of Overflow Events - CURRENT YEAR	Annual CSO Volume (MG) - BASELINE	Annual CSO Volume (MG) - PREVIOUS YEAR	Annual CSO Volume (MG) - CURRENT YEAR	Measurement Method
046	42.8586	-78.8203	Cazenovia Creek	C	1	Fixed Weir	None	1	1	0	1.31	0.00	0.00	Modeled
047	42.8594	-78.8226	Cazenovia Creek	C	5	Fixed Dam	None	44	10	4	8.65	4.47	1.64	Modeled
048	42.8600	-78.8247	Cazenovia Creek	C	2	Fixed Dam	None	0	0	0	0.00	0.00	0.00	Modeled
049	42.8613	-78.8269	Buffalo River	C	1	Fixed Dam	None	0	0	0	0.00	0.00	0.00	Modeled
050	42.8635	-78.8211	Buffalo River	C	1	Fixed Dam	None	14	9	4	3.17	3.13	1.26	Modeled
051	42.8631	-78.8108	Buffalo River	C	1	Fixed Dam	None	4	0	0	1.22	0.00	0.00	Modeled
052	42.8645	-78.8024	Buffalo River	C	2	Fixed Dam	None	10	0	0	10.87	0.00	0.00	Modeled
053	42.9237	-78.8569	Scajaquada Creek	B	42	Fixed Dam	None	65	44	30	268.00	502.06	254.21	Modeled
054	42.9521	-78.9098	Niagara River	SA	7	Fixed Dam	None	0	0	0	0.00	0.00	0.00	Modeled
055	42.9450	-78.9088	Niagara River	SA	1	Fixed Dam	None	41	40	22	601.10	1113.59	538.96	Modeled
056	42.9348	-78.8761	Scajaquada Creek	B	2	Fixed Dam	None	5	0	0	0.04	0.00	0.00	Modeled
057	42.9290	-78.8973	Scajaquada Creek	B	1	Fixed Dam	None	0	0	0	0.00	0.00	0.00	Modeled
058	42.9303	-78.8959	Scajaquada Creek	B	3	Fixed Dam	None	0	0	0	0.00	0.00	0.00	Modeled
059	42.9310	-78.8939	Scajaquada Creek	B	3	Fixed Dam	None	0	1	1	0.00	0.28	0.17	Modeled
060	429343	-78.8782	Scajaquada Creek	B	12	Fixed Dam	None	5	0	0	0.70	0.00	0.00	Modeled
061	42.9210	-78.9002	Black Rock Canal	C	1	Fixed Weir	None	10	1	0	31.19	0.33	0.00	Modeled
062	42.9154	-78.9027	Black Rock Canal	C	1	Fixed Weir	None	0	0	0	0.00	0.00	0.00	Modeled
063	42.9023	-78.9017	Black Rock Canal	C	1	Fixed Weir	None	13	2	2	0.63	0.32	0.24	Modeled
064	42.8665	-78.8678	Buffalo River	C	7	Fixed Weir	None	56	15	6	21.11	17.16	7.22	Modeled
066	42.8650	-78.8021	Buffalo River	C	9	Fixed Weir	None	10	8	4	1.72	11.82	5.15	Modeled

Closed CSO Outfall Information

Outfall Number	Latitude (Decimal)	Longitude (Decimal)	Receiving Water Name	Receiving Water Class	Approximate Year Outfall Closed	Cause / Reason for Closure

CSO Outfall Explanation
BSA has no intent to close CSOs; they prevent flooding & double as MS4 outfalls and in the case of CSOs 053 and 006 convey Scajaquada Creek flows.

Part III - Collection System Information

Baseline Information

If Baseline information is unknown, please use a best estimate, then characterize/describe in the narrative box below.

Baseline - Percentage (%) of combined sewers in the collection system owned by the permittee
97

Baseline - Approximate length (mi) of combined sewers owned by the permittee
844

Baseline - Number of CSO Outfalls owned by the permittee
65

Baseline - Number of CSO Events
85

Baseline - Annual CSO Volume discharged (MG)
1,886

Baseline - Population Served by the CSS
292,648

Baseline - Number of Satellite System Connections
5

Post-LTCP Implementation Information

If an LTCP has not yet been developed, or wasn't required, please input the current year information for each field.

Future - Percentage (%) of combined sewers in the collection system owned by the permittee
97

Future - Approximate length (mi) of combined sewers owned by the permittee
844

Future - Number of CSO Outfalls owned by the permittee
52

Future - Number of CSO Events
9

Future - Annual CSO Volume Discharged (MG)
486

Future - Population Served by the CSS
261,310

Future - Number of Satellite System Connections
5

Use the space below to provide any further relevant information on the collection system & to indicate if baseline information is unknown. This should include a description of any unique ownership, operation and maintenance agreements or further explanation and description of POSS/satellite system connections. For POTW's with POSS's, please indicate which municipality owns/operates which infrastructure (Pump Stations, trunk sewers, interceptors, regulators, outfall structures, etc.) as well as who is responsible for reporting CSO events from CSOs within the POSS and who is responsible for reporting SSOs within the POSS.
Erie County Sewer District #4 (NYS900040), Erie County Sewer District #1 (NYS900038), the Village of Sloan (NYS900022), the Town of Cheektowaga (NYS900020), and the Town of West Seneca (NY0203734) are all charged with operating and maintaining the entirety of their upstream POSS's and ensuring that they are separate sanitary sewers. Buffalo Sewer's industrial waste division issues permits to those industrial waste dischargers within the upstream POSS's and performs inspections of these sites. The POSS's are also responsible for operating and maintaining flow monitoring stations and providing records verifying that they are within compliance with Intermunicipal Agreement maximum discharge rates to the Buffalo Sewer Authority's system.

Part IV - CSO Control Implementation Information

Reporting Year Information

Provide a summary of any significant LTCP or PCCM projects completed within the reporting year and any milestones for the reporting year that were not achieved.
The Mill Race RTC was commissioned and put into operation. NFA Phase I construction continued throughout 2024. NFA Phase II Contract A was awarded, and pre-construction activities were initiated. Canisius/Jefferson Delavan OLS Environmental Impact Statement was developed for both tank and tunnel options. Bailey & Amherst RTC and Gates Circle RTC construction are ongoing. Breckenridge Niagara RTC design advanced to 100% plans. SPP229A RTC work was bid and awarded. Planning and design of SPP254, SPP 337, SPP 338, SPP 341A, SPP 336B, SPP 165B, and SPP 175 Modifications were advanced to 60% plans and specifications. Planning for Sidney OLS and Edison Martha OLs were advanced to 30% design.

Upcoming Year Information

Summarize significant LTCP and PCCM projects planned and milestones due for the upcoming year.
Milestones:

Design Start: Schiller Park OLS, Erie Basin OLS, SPP339, SPP 340, and SPP 206 A&B Modification 3/3/2025

Design Completion:
Breckenridge Niagara RTC 2/25/2025
NFA Phase II 7/10/2025
SPP341A , SPP 336 B, SPP 165B, SPP 175 Modification 12/31/2025

NTP:
Bailey & Amherst RTC 5/28/2025
Gates Circle RTC 4/8/2025

Part V - CSO Best Management Practices (BMPs)

Which CSO BMPs does your SPDES permit require?
3- Industrial Pretreatment
1- CSO Maintenance / Inspection
2- Maximize Use of the Collection System for Storage
4- Maximize Flow to POTW
6- Prohibition of Dry Weather Overflows
10- Connection Prohibitions
12- Control of Runoff
14- Characterization and Monitoring
8- Combined Sewer System Replacement
5- Wet Weather Operating Plan (WWOP)
7- Control of Floatables and Settleable Solids
9- Combined Sewer / Extension
11- Septage and Hauled Waste
13- Public Notification

BMP No. 1 CSO Maintenance Inspection

6 NYCRR 750-2.8(a)(2)
(EPA NMC No. 1: Proper Operation and Regular Maintenance)

Is there a written program for the maintenance and inspection of the CSS and CSOs?
Yes

What is the minimum frequency of dry-weather CSO inspections?
Monthly

Are inspections of CSOs/regulators conducted during or following wet weather events?
Yes

Do the inspection reports indicate visual inspection observations, observed or presumed flows, weather conditions, equipment condition, and any repair work recommended?
Yes

Are the inspection reports submitted to the DEC Regional Office?
Yes, with Monthly Operating Reports

Indicate which of the following additional components are included in the maintenance and inspection program:
Pump Stations
Sewer Pipes & Interceptors
CSO Outfalls
Sewer Manholes & Catch Basins
CSO Controls (e.g. regulators, screening/storage/treatment facilities)

Are there existing inter-municipal agreements which specify responsibilities for inspection, maintenance, and/or repair?
Yes

IMA Listing - Please indicate the community name and year of last IMA update.

Community Name	Year of most recent IMA Update
Town of Cheektowaga	1996
Erie County Sewer District 1	1996
Erie County Sewer District 4	1996
West Seneca Sewer District 15	1996
Village of Sloan	1998
West Seneca SD 1,2,3,4,9,10	1996
West Seneca SD 5,13,14	1996

Is the collection system mapped using GIS?
Yes, the entire system (including manholes & catch basins)

Is the collection system monitored using a SCADA system or other flow monitoring system?
Yes, SCADA

In the past year, was progress made to install, upgrade, or expand monitoring with SCADA/Other system?
Yes

In the upcoming year, is installation, upgrade, or expansion of monitoring with SCADA/Other system planned?
Yes

Does the municipality have an asset management program that includes the collection system?
In progress

Have any work efforts or problems in the past year resulted in changes in overflows? If yes, describe below in the narrative box.
Yes

In the past year, was the inspection and maintenance program mostly:
Reactive (responding to problems)?

Use the space below to provide a narrative description of the following:

a) Lengths of sewer cleaned and inspected,
b) Number of manholes and catch basins cleaned and inspected,
c) Any repairs or replacements conducted in the CSS,

a) Length cleaned and inspected: 57,133 feet
b) Number of manholes and catch basins cleaned and inspected: 4,493
c) Manhole/receiver/catch basins repaired: 136
d) Sewer main repaired/replaced: 2,823 ft

Use the space below to describe any large equipment purchases made in the reporting year or planned for the upcoming year (e.g. vacuum trucks, pumps, etc.) , as well as, any work efforts or problems in the past year that resulted in changes to the collection system maintenance and inspection program, and any noticeable results of the system changes (e.g. fewer events, less CSO volume, a reduction in floatables or other pollutants discharges, visible improvement in water quality of receiving water).
Two new vacuum trucks were purchased in 2024. Additionally, an additional inspector was trained to inspect the weir structures to ensure redundancy in inspection as needed.

BMP No. 2 Maximize Use of the Collection System for Storage

6 NYCRR 750-2.7(f), 750-2.8(a)(2), 750-2.8(a)(5)
(EPA NMC No. 2: Maximization of Storage in the Collection System)

In the past year, was the collection system able to convey the required minimum flows to the treatment plant during ALL wet-weather events?
No

Has the hydraulic capacity of the collection system been evaluated?
Yes

When was the hydraulic capacity last evaluated?
2021

Have regulators and weirs ever been adjusted/modified to maximize storage?
Yes

In the past year, or the upcoming year, indicate if any of the following items have been changed or if changes are planned to improve use of the collection system for storage? If so, describe below in the narrative box.
Tidegate Maintenance/Repair/Replacement
In-Line Storage
Regulator or Weir Adjustment

Use the space below to provide a narrative description of the changes to structures or procedures that will improve use of the collection system for storage (e.g. tide gate maintenance/repairs/replacement, regulator or weir adjustment, FOG program changes, removal of bottlenecks/flow obstructions, sewer cleaning and sediment removal, in-line storage, etc.).

Flood prevention grant from FEMA has been awarded and contract signed. Weirs have been inspected as part of preliminary design for SPPs 229A, 254, 337, 338, 341A, 336B 165B, and 175. The FOG Program is being reinitiated with a new program leader identified and materials being distributed including FOG scrapers and educational pamphlets at a variety of outreach events throughout the City. Replacement of actuators at Hertel are being budgeted for 2025. Lack of capacity at the treatment facility while the NFA construction is ongoing is a significant bottleneck.

BMP No. 3 Industrial Pretreatment

6 NYCRR 750-2.7(f) and 2.9(a)(4)
(EPA NMC No. 3 & 7: Review and Modification of Pretreatment Requirements & Pollution Prevention Programs to Reduce Contaminants in CSOs)

Is there an approved pretreatment or mini-pretreatment program or acceptance of flow from non-domestic sources?
Yes, IPP or Mini-IPP

Is there an inventory of industrial or non-domestic dischargers?
Yes

Has the impact on CSOs from non-domestic users that discharge toxic pollutants been evaluated, and steps taken to minimize such impacts?
Yes

Does the pretreatment program consider CSOs in the calculation of local limits?
Yes

Are there any restrictions on industrial user discharges to the collection system during wet-weather events?
No

Are there any industrial discharges that could reach CSO outfalls?
Yes

Do industrial users upstream of CSOs discharge any bioaccumulative chemicals of concern (BCCs)?
No

Do any industrial users have a holding tank or equalization tank to store wastewater prior to discharge to the CSS?
Yes

In the past year or in the upcoming year, have there been or will there be negotiations or changes to agreements with industrial dischargers, which will potentially reduce impacts during CSO events? Describe these changes below in the narrative box.
Yes

Use the space below to provide a narrative description of industrial discharges to the collection system, any restrictions on industrial discharges during wet-weather events, and any agreements that will potentially reduce impacts during CSO events.

Upon review of existing Industrial User□s discharge permits no BCCs as listed in TOGS 1.3.8 are currently permitted for discharge to Buffalo Sewer's system upstream of CSOs. A revised "Technical Review of Local Mass Based Limits Industrial Pretreatment Report" prepared in accordance with USEPA's "Local Limits Development Guidance Manual" was submitted in October of2022 to USEPA for review and approval.
Once approved, the significantly reduced limits specified therein will be used in all future BPDES permit applications including renewals.Buffalo Sewer is in ongoing discussions with Lactalis to develop flow equalization at their facility on South Park. This will ensure that a consistent and manageable flow is discharged from this site.

BMP No. 4 Maximize Flow to POTW

6 NYCRR 750-2.7(f), 2.8(a)(2), and 2.8(a)(5)
(EPA NMC No. 4: Maximization of Flow to the POTW for Treatment)

What is the permit required minimum flow during wet weather events through the headworks (in MGD)?
450.00

What is the permit required minimum flow during wet weather events through primary treatment (in MGD)?
180.00

What is the permit required minimum flow during wet weather events through secondary treatment (in MGD)?
300.00

What is the permit required minimum flow during wet weather events through disinfection (in MGD)?
450.00

In the past year, were the headworks, primary treatment works and disinfection works able to pass the flows specified in the permit for all wet weather flows?
No

In the past year, was the secondary treatment works able to pass the flows specified in the permit for all wet weather flows?
No

If the minimum flows were not achieved for all wet-weather events in the reporting year, has a plan to accomplish this been developed and submitted to the Department?
Yes, developed & submitted

In the past year or in the upcoming year, have there been or will there be any physical modifications to the collection system which have allowed more flow to reach the POTW? If yes, describe below in the narrative box.
Yes

Are there areas of the collection system, including pump stations that need additional study to evaluate capacity, condition, or to determine if illegal connections (i.e. inflow) exist? If yes, list below in the narrative box
Yes

In the past year, have any new problem areas been identified that restrict flow to the plant? If yes, list the locations below in the narrative box.
No

Use the space below to provide a narrative description of:

a) any physical modifications to the collection system which are completed or anticipated and will allow for more flow to reach the WWTP,
b) any areas of the collection system which need additional study to evaluate capacity or inflow issues,
c) any known problem areas that restrict flow to the WWTP, and
d) any plans to address hydraulic restrictions (e.g. pipe replacement, construction of relief sewer or overflow tanks, pump station improvements, weir adjustment, smoke/dye testing to identify illicit connections).

a) The previously cited capital projects will all lead to an increase in flow to the WWTP.
b) As part of the tuning of the Real Time Control System, significant deviations from modeled flows are at times detected and reveal undocumented changes to the system which in turn result in modifications to capital project designs and/or notices of violation to others.
c) Buffalo Sewer is in ongoing discussions with EPA/DEC/DOJ/and NYS Attorney General to address through major capital plan.
d) Upgrades are being developed for both Kelly F and South Buffalo Pumping Stations to ensure that both are fully able to reach their capacities at all times.

BMP No. 5 Wet Weather Operating Plan

6 NYCRR 750-2.8(a)
(EPA NMC: None)

Does the plan identify the maximum flows through preliminary, primary, secondary treatment, tertiary, and disinfection units?
Yes

In the past year, did treatment of wet weather flows cause any effluent violations or destabilize treatment upon return to normal service? If yes, describe below in the narrative box.
No

If the collection system or plant has been modified or upgraded, has the WWOP been modified to reflect new flow rates or new procedures and the revised plan submitted to the NYSDEC Regional Office?
Yes, updated & submitted

In the upcoming year, are changes to the WWOP expected? If so, describe below in the narrative box.
Yes

When was the WWOP last updated?
2024

When was the WWOP last submitted and approved by NYSDEC?
2007

Use the space below to provide a narrative description of any changes to the WWOP during the reporting year or anticipated in the upcoming year.

The Wet Weather Operating Plan was updated in 2024 to reflect current practices and policies including the use of Real Time Control structures. As work in both the collection system and at the Treatment Facility continue, it is expected that at least once a year, the WWOP will require ongoing updates.

BMP No. 6 Prohibition of Dry Weather Overflows

6 NYCRR 750-2.7 and 2.8(b)(2)
(EPA NMC No. 5: Elimination of CSOs During Dry Weather)

In the past year, were there any dry weather overflows?
Yes

Were all dry weather overflows reported via NY-Alert, in accordance with 6 NYCRR 750-2.7?
Yes

Did dry weather overflows lead to improvement of procedures or equipment?
Yes

Has the likelihood of future dry weather overflows been eliminated? If not, describe why below in the narrative box.
No

Use the space below to provide a narrative description of the both the causes of any dry weather events that occurred in the reporting year and resulting changes or improvements that were made to procedures or equipment (e.g. routine inspection schedule, OMIP, inter-municipal agreements, FOG program, removal of illicit connections, I/I Control program, leaky tidegates, adjustment and/or repair of regulators, upgraded auxiliary power, elimination of hydraulic bottlenecks, etc.).

All overflow weirs are monitored at least once a month. Several CSO weirs with high activation rates are further monitored using metering with remotely monitored alarms. Both actual overflows, but also the build up of material that may contribute to a future dry weather overflow are monitored. There remains the possibility that due to the accidental or deliberate release of deleterious material to the collection system, that the dry weather channels may become clogged.

BMP No. 7 Control of Floatables and Settleable Solids

6 NYCRR 750-2.8(a)(4)
(EPA NMC No. 6: Control of Solid and Floatable Materials in CSOs)

In the past year, did any outfalls discharge floating solids, oil and grease, or solids of sewage origin?
Yes

Indicate which of the following engineering controls or control measures, if any, have been implemented or will be implemented in the upcoming year?
Catch basin hoods
Source controls (street cleaning, public education, household hazardous waste collection, solid waste collection, recycling, and/or composting of lawn/leaf/roadkill deer)
Booming & Skimming of Open Waters
Screens
Other: Track down procedures for illicit discharge in coordination with NYSDEC Region 9

Use the space below to provide a narrative description of any ongoing issues with control of floatables and settleable solids from CSO outfalls and any existing or planned engineering controls or control measure to be implemented.

Floatables are captured by the Hamburg Drain Floatable Control Facility. Hoods have long been installed on catch basins and receivers within the Buffalo Sewer Authority's combined sewer system and are
routinely replaced.
Streets are swept by City of Buffalo DPW.

BMP No. 8 Combined Sewer System Replacement

6 NYCRR 750-2.10(i)
(EPA NMC: None)

In the past year, were any combined sewers designed or constructed that were not approved by NYSDEC?
No

Are there any plans or current projects to separate combined sewers into sanitary & storm sewers?
No

Were any cross-connections eliminated in the past year or planned for the upcoming year?
No

In the past year, how many miles of combined sewer were separated?
0.00

In the upcoming year, how many miles of combined sewer are scheduled to be separated?
0.00

Use the space below to provide a narrative description of how this BMP was implemented during the reporting year.

As new development occurs new connections and new sewers on private lands are required to be constructed as separated. In evaluating LTCP project feasibility, separation is considered as an option.

BMP No. 9 Combined Sewer / Extension

6 NYCRR 750-2.10(i)
(EPA NMC: None)

In the past year, were any combined sewers extended?
No

Is any development planned upstream of a combined sewer in the near future?
Yes

Has a sewer extension plan been submitted to NYSDEC for review and approval?
Yes

Does the plan include any flow retention, storage, or treatment structures?
Yes

If a plan contained a flow credit requiring removal of I/I, what was the requirement or ratio?
N/A

Use the space below to provide a narrative description of how this BMP was implemented during the reporting year.

Proposed sanitary sewer taps of 2500 gpd or more are required to submit a downstream capacity analysis to the NYSDEC for review demonstrating that there is capacity. As a part of the BSA□s sewer tap permitting process for storm discharges, new development upstream of or directly discharging to the CSS with soil disturbance of 0.25 acres or more must retain/detain on site post-construction flows during a 25-year storm in excess of pre-construction flows during a 2-year storm.

BMP No. 10 Connection Prohibitions

6 NYCRR750-2.9(a)(5)
(EPA NMC: None)

Are new connections prohibited by NYSDEC?
No

In the upcoming year, is any work planned to either increase capacity or reduce hydraulic loading to the WWTP? If so, describe below in the narrative box.
Yes

Use the space below to provide a narrative description of how this BMP was implemented during the reporting year.

Secondary treatment improvement project will be ongoing - to increase capacity within Wastewater Treatment Plant. Primary treatment facility project Contract A will also be ongoing to upgrade the aged tanks.

BMP No. 11 Septage and Hauled Waste

6 NYCRR750-2.7(f) and 2.8(a)(1)
(EPA NMC: None)

Does the POTW accept septage or hauled waste?
Yes

In the past year, were there any discharges or releases of septage or hauled waste INTO the collection system upstream of a CSO?
No

Are there restrictions on when the POTW accepts hauled waste or septage?
Yes

Is there a dedicated location to discharge septage at the WWTP?
Yes

Does the facility have authorization from NYSDEC to accept hauled waste or septage at a location other than the WWTP?
No

Have there been, or will there be, any changes to the POTW's policy on septage and hauled waste?
Yes

Use the space below to provide a narrative description of how septage and hauled waste are received by the POTW, where remote acceptance locations are, any POTW restrictions on when these wastes can be received, and the total volume of these wastes received at remote locations during the reporting year.

POTW does not accept hauled waste or septage on certain holidays.
Dedicated location to discharge septage: Waste hauler receiving station
As facility projects progress, it is expected that there will be restrictions on times, locations, and volume of septage discharges at the treatment facility.

BMP No. 12 Control of Runoff

6 NYCRR750- 2.1(e)
(EPA NMC: None)

Is sediment in runoff from construction zones entering catch basins in the combined sewer system?
Yes

Are impacts of run-off, from development and re-development in areas served by combined sewers, reduced by requiring compliance with the New York Standards for Erosion and Sediment Control and the quantity control requirements included in the New York State Stormwater Management Design Manual?
Yes

Is there adequate communication between the local municipal department that enforces local stormwater codes and ordinances and the collection system staff regarding stormwater runoff?
Yes

Do the municipalities within the combined sewer system have adequate storm water pollution prevention programs to reduce pollutants in stormwater?
Yes

Are any changes needed in the implementation of this BMP to reduce the number of CSO events, the volume discharged, or pollutants in the discharge? If yes, describe below in the narrative box.
Yes

Use the space below to provide a narrative description of how this BMP was implemented during the reporting year and any planned changes for the upcoming year.

BSA is a non-traditional MS4. For most of the City of Buffalo, BSA performs SWPPP reviews, approvals, and inspections for the separate stormwater components. For those locations within the CSS, BSA enforces local regulations. In the next year, BSA intends to work with the City of Buffalo Departments to ensure that all aspects of the MS4 regulations are fully implemented. The issuance of the revised MS4 permit creates the opportunity for the City and non-traditional MS4s to gain coverage.

BMP No. 13 Public Notification

6 NYCRR 750-1.12
(EPA NMC No. 8: Public Notification)

In accordance with the Discharge Notification Act Requirements of the SPDES permit, outfall identification signs must be installed and maintained at all permitted CSO outfalls. Are these signs installed and maintained at all permitted CSO outfalls?
Yes

Are all CSO events in accordance with the SPDES permit reported via NY-Alert?
Yes

In accordance with the Sewage Pollution Right to Know Law, as detailed in 6 NYCRR Part 750-2.7, all CSO discharge events must be reported via the NY-Alert electronic notification system.

CSO events not in accordance with the SPDES permit conditions should be reported as a bypass via NY-Alert. When these events occur, are they being reported via NY-Alert?
Yes

Beyond the use of NY-Alert, does the POTW maintain any other public notification systems (e.g. websites, social media, email systems, public media broadcasts) to alert potential users of receiving waters affected by CSOs?
Yes

For all CSOs to receiving waters that are Class B or higher, a written public notification program (PNP) is required to be developed, implemented, and publicly available to inform citizens of the location and occurrence of CSO events. Is there a written PNP?
Yes

For all CSO communities within the Great Lakes Basin, a written PNP is required. Is your community within the Great Lakes Basin?
Yes

For communities with a PNP, when was the PNP last updated?
2024

Use the space below to provide a narrative description of how any updates to CSO outfall signs and PNPs, as well as a summary of any other public notification systems (beyond NY-Alert) used to alert the public of CSO events.

The Buffalo Sewer Authority utilizes the NY-Alert system and the CSO outfall signs which are checked on an annual basis for condition as required to alert the public to the potential presence of CSO events. On the buffalosewer.org website, Buffalo Sewer also maintains a map of CSOs and their current modeled probability of overflow based on a simplified linear regression of the model for each outfall. The PNP was updated and posted to the website in 2024.

BMP No. 14 Characterization and Monitoring

(6 NYCRR 750-1.11(a), 2.5(a) and 2.7(g))
(EPA NMC No. 9: Monitoring to Characterize CSO Impacts and the Efficacy of CSO Controls)

Has the combined sewer system been modeled for use in determining or estimating the frequency of overflows and identifying CSO impacts?
Yes

Was baseline sampling conducted as part of LTCP development?
Yes

Was any Post Construction Compliance Monitoring (PCCM) sampling conducted in the reporting year or planned for the upcoming year?
Yes

In what years does the SPDES permit, Order on Consent, or other enforcement mechanism require PCCM sampling to be conducted?
2034

CSO discharge monitoring methods should be specified for each CSO outfall in Part II of this Annual Report. For all CSO outfalls that are not metered, explain how overflow volumes are either modeled or estimated to collect sufficient data and document permit compliance and the success of CSO BMP implementation. In addition, please provide a brief summary of the findings from the most recently submitted PCCM Report (including compliance with the selected CSO Policy Approach criteria and attainment of water quality standards).

Extensive characterization & metering undertaken during the development of the BSA□s CSO LTCP. CSO outfall monitoring is achieved through bimonthly inspection of regulators. A system-wide hydraulic model was developed using flow meters & level gages. A system-wide water quality model was developed. In calibrating the metering data to the "Modified Typical Year" rain gages were installed throughout the City of Buffalo. The post-construction monitoring plan: submitted-03/17/15; approved-03/01/16. Recalibrated model submitted to regulators for comment-01/08/19; final approval-10/6/21. Recalibrated model demonstrated failure of approved LTCP to meet waterbody based activation goals; revised LTCP development and negotiations have been ongoing.

Owner/Operator Certification

Owner/Operator Certification Form Download

Download the certification form by clicking the link below. Complete, sign, scan, and upload the form.
Owner/Operator Certification Form (PDF)

Upload Owner/Operator Certification Form
csobmpcert.pdf - 01/31/2025 01:28 PM
Comment
NONE PROVIDED

Attachments

Date	Attachment Name	Context	User
1/31/2025 1:28 PM	csobmpcert.pdf	Attachment	Rosaleen Nogle

Status History

	User	Processing Status
1/3/2025 8:23:44 AM	Rosaleen B Nogle	Draft
1/31/2025 2:44:02 PM	Rosaleen B Nogle	Submitted
1/31/2025 2:44:03 PM	Rosaleen B Nogle	Deemed Complete

Processing Steps

Step Name	Assigned To/Completed By	Date Completed
Form Submitted	Rosaleen B Nogle	1/31/2025 2:44:02 PM