



STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
GOVERNOR

PAUL MERCER
COMMISSIONER

September 7th, 2017

Yarissa Ortiz-Vidal
Environmental Compliance Manager & Assistant Director.
City of Rockland, Water Pollution Control Facility
40 Tillson Avenue
Rockland, Maine 04841-3417

Dear Yarissa,

Let me begin by complimenting the City on its recent compliance performance – 2016 and 2017 to date represent the best period of treatment plant performance that I’ve seen since my first involvement with Rockland in 2006.

You should endeavor to read through the entire report, but I’ve summarized my findings both at the end of the report itself (Recommendations and Corrective Actions), as well as here in the cover letter. Corrective Actions are program faults that need to be “fixed”, while Recommendations & Questions may be considered advice on improving the program or questions that I ask for clarification or perhaps regarding points that I missed.

Corrective Actions

O&M Manual, General – You need to update this to your current status and process management strategies; there is a lot of recently acquired process knowledge that needs to be incorporated therein. I would strongly suggest that the PCF adopt an electronic format that will lend itself to more ready & sustainable edit & update efforts. The O&M manual remains a work in progress; given all of the turnover and coming-up-to-date, new license, and Consent Agreement activity, I’m not inclined to push it at this time. The Process Control portion alone is a cumulative 816 pages! It’s more important now for Yarissa (and Matthew) to get comfortable with what has to be done every day, as a higher priority.

Final Effluent Sampler - The sample refrigerator thermometer in the final sampler did not show indication of being calibrated.

Lab Bench Sheet - The 08/22 TSS “Blended” bench sheet had a math error. This bench sheet should be reconfigured a bit to make the process of calculating more foolproof. Same with any of the others, if and as needed.

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Lab Eye Wash - The last time the lab eye wash was checked was by April in 2016! Rust water ran out when it was activated, and it drained straight on to the floor – figure out how to either plumb or capture the water. This (and all other) eyewashes should be checked at least once/month, if not more frequently. I'm sure April had a good lab safety protocol in place; dig it out and make sure it's being adhered to.

Infiltration of sea water at Harbor Park – Please address as soon as possible.

Recommendations & Questions

Flowmeter Calibration - It seemed that there is a flowmeter calibration in program in place, but the information supporting an audit was located in a number of places and not readily accessible. What I look for during an inspection is:

- Organized information that a routine calibration & maintenance process is in place
- ~~A minimum flow meter calibration frequency of 1/year, or as needed~~
- Electronic or hard copy documentation of this activity being available on demand, including dates, times, individuals performing the work, and short descriptions of work performed (this often includes a number of as-found and as-left parameters for each unit).

Generator Maintenance & Recordkeeping - What is the treatment plant generator exercise/test under load protocol? Is all of the generator exercising and load testing tracked & documented? (similar to flow meters).

Primary Clarifiers - Flow appeared to be evenly balanced between both clarifiers; How is this balance controlled/maintained? The splitter box appears to be a box with two weirs, gravity overflow only. Any associated valving? How are the individual clarifiers isolated from each other?

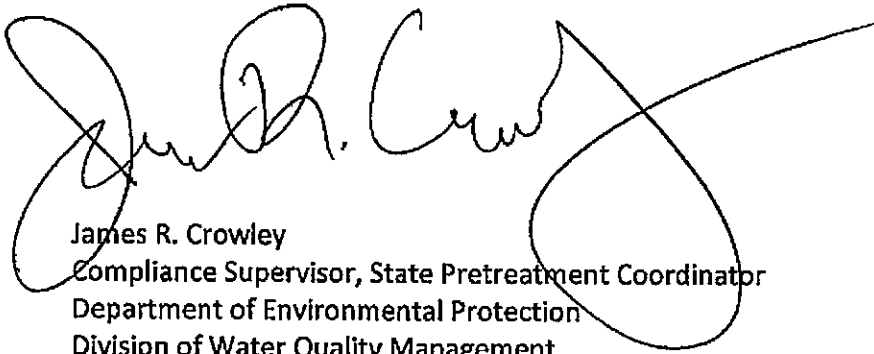
Polymer - Is polymer used on a regular basis in the secondary clarifiers?

Grease Management Ordinance – The City should have a practical, reasonable process for keeping grease (Fats, Oils, & Grease, or FOG) out of the sewer – though generally Maine is a bit behind the curve, nationally most cities do. Having a FOG management plan is not explicitly required by statute or rule; it is intended to help the City or District avoid collection & treatment system issues. A FOG program is often a difficult sell to local political and economic leadership. As long as the PCF and the City's collection system do not experience compliance issues due to FOG (assuming the City is willing to pay the cost of whatever other issues do arise), the Department will not "mandate" that you have such a program.

Letter to Rockland
09/07/17
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If you have any questions on this, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "James R. Crowley". The signature is fluid and cursive, with a large loop at the end.

James R. Crowley
Compliance Supervisor, State Pretreatment Coordinator
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STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



PAUL R. LEPAGE
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September 21st, 2017

PAUL MERCER
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Yarissa Ortiz-Vidal
Environmental Compliance Manager & Assistant Director.
City of Rockland, Water Pollution Control Facility
40 Tillson Avenue
Rockland, Maine 04841-3417

Dear Yarissa,

I inadvertently omitted the following two items from my original cover letter regarding the August 24 Inspection – they should have been included under Corrective Actions.

Corrective Actions

Replacing Open-grating Manhole Covers – This is an item that has been outstanding for a number of years. Given that the City needs to undertake the minimization or elimination of as many sources of Inflow & Infiltration (I&I) as possible, Rockland needs to replace the numerous open-grating covers on sanitary manholes throughout the collection system with solid-type covers. The open-grating covers are clear sources of storm & melt water inflow.

Combined Sewer Stormwater Culverts – There are locations throughout the collection system where stormwater culverts drain into combined sanitary sewer lines. To prevent an avoidable threat to the compliant operation of the Water Pollution Control Facility, these culverts must be cleaned out on a routine basis.

If you have any questions on this, please feel free to contact me.

Sincerely,

James R. Crowley
Compliance Supervisor, State Pretreatment Coordinator
Department of Environmental Protection
Division of Water Quality Management
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