

United States Environmental  
Protection Agency  
Administrative Order

# Funding Plan

Order: CWA-02-2013-3058

City of Middletown  
New York

May 2015

# Table of Contents

<b>Section 1</b>	<b>Introduction</b>	<b>1-1</b>
1.1	Background	1-1
1.2	Purpose	1-1
<b>Section 2</b>	<b>Organization and Staffing</b>	<b>2-1</b>
2.1	Organizational Plan	2-1
2.2	Staff Responsibilities and Qualifications	2-3
2.3	Coordination with Other Departments	2-3
2.4	Major Equipment used in Program	2-3
<b>Section 3</b>	<b>Program Costs and Funding Mechanisms</b>	<b>3-1</b>
3.1	Estimated Program Costs	3-1
3.2	Financing Sources and Cost Recovery Systems	3-1

## List of Tables and Figures

Figure 1 - City of Middletown’s Industrial Pretreatment Program’s Organizational Plan	2-2
Table 1-Estimated IPP Costs	3-1
<b>Table 2 - Fee Schedule - Available Separately</b>	

# Section 1

## Introduction

### 1.1 Background

The City of Middletown, NY (City) owns and operates an 8.5 mgd wastewater treatment plant located at 159 Dolson Avenue, Middletown, NY. The treatment plant discharges to the Wallkill River.

The City's Sewage Treatment Plant (STP) was originally constructed in 1929. The current treatment process includes preliminary treatment (screening and grit removal), primary treatment (primary clarifiers), secondary treatment (fine bubble aeration and secondary clarification) and tertiary treatment (seasonal ultraviolet (UV) disinfection).

On, September 26, 2013 the City was issued an Administrative Order by the United States Environmental Protection Agency (USEPA) related to the implementation of an pretreatment program that complies with the General Pretreatment Regulations at 40 CFR Part 403. This report has been prepared in partial fulfillment of the requirements of that Administrative Order.

### 1.2 Purpose

The ability to develop and implement a successful pretreatment program depends on a number of factors. This Funding Plan focuses on needed resources and the organization to apply them efficiently and effectively. Section 403.8(f)(3) requires that the City's Publicly Owned Treatment Works (POTW) has "sufficient" resources and qualified personnel to implement program authorities and procedures. To implement properly a pretreatment program, the City includes:

- A workable organization to integrate elements of the program;
- A staff of appropriate size and training to carry out program requirements;
- Necessary equipment and supplies to fulfill monitoring and other program needs; and
- Adequate funds to support the program.

## Section 2

# Organization and Staffing

The limited number Industrial Users (IUs) in the City of Middletown reduces the overall scale of the Industrial Pretreatment Program (IPP). Given the reduced program size, the POTW will utilize existing resources and allocate staff to fill multiple roles to establish this IPP.

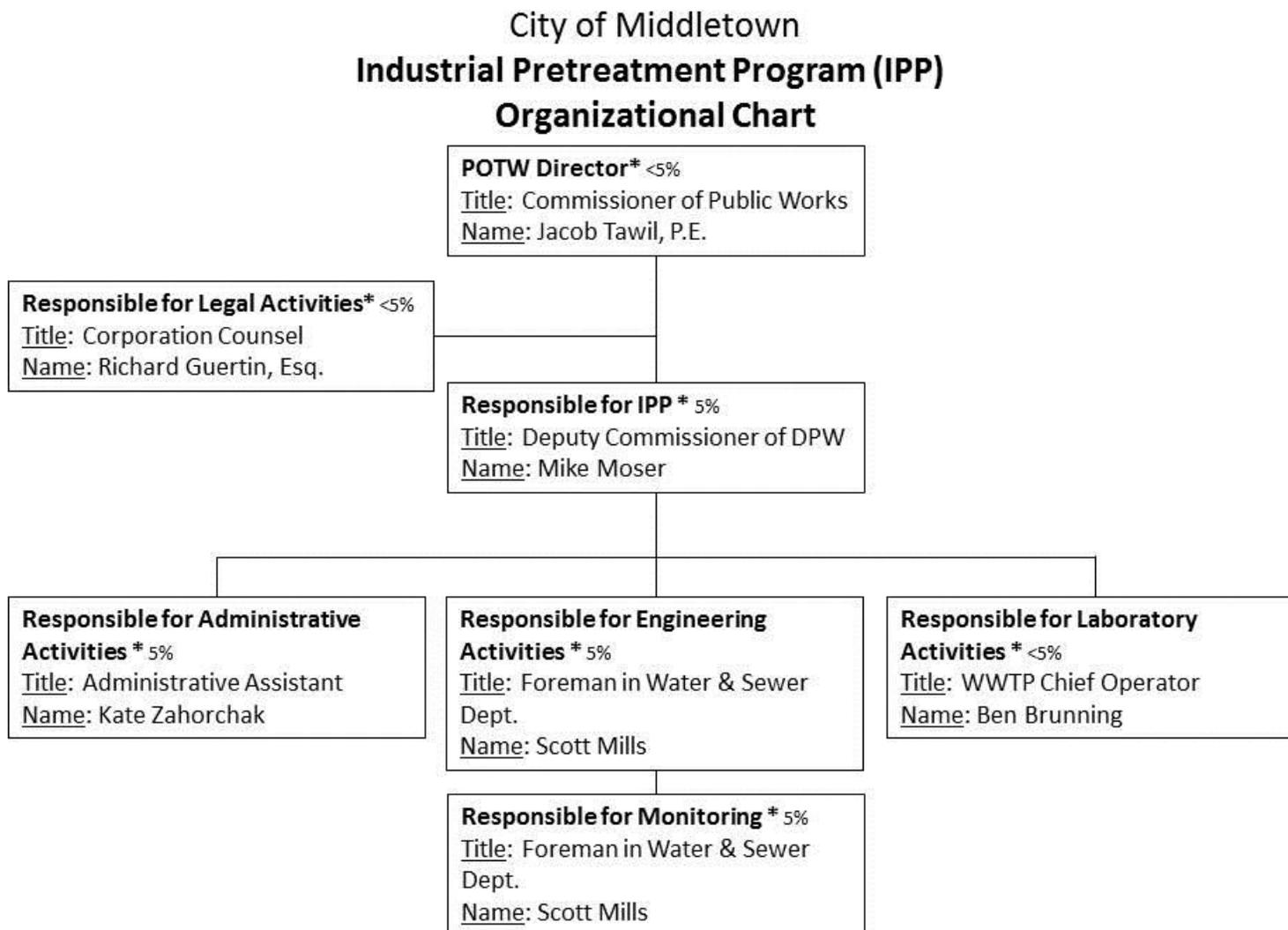
## 2.1 Organizational Plan

The following activities are addressed in the organizational chart:

- Sampling and inspection
- Laboratory analysis
- Technical assistance
- Legal assistance
- Program administration

Please see Figure 1 for proposed organizational plan for the City of Middletown's IPP.

Figure 1 - City of Middletown's Industrial Pretreatment Program's Organizational Plan



\*Part-time positions with associated estimated overall percentage of time commitment to IPP

## 2.2 Staff Responsibilities and Qualifications

Due to reduced scale of IPP, the organization can be managed using limited individual staff members that fill multiple roles. The following are the duties and qualifications for each role required in the organization of the IPP:

Commissioner of Public Works (Commissioner)– See definition in Sewer Use Ordinance §389-1. Responsible for the overall administration of the IPP. Qualifications include experience in municipal government, communication with IUs, municipal finances and accounting, personnel, and public participation.

Corporation Counsel – Responsible for legal activities and matters providing legal assistance to the City related to interpretation of regulations and other legal documents that affect pretreatment program operations and prepare contracts or other agreements. This person also will initiate formal Legal actions against violators, including injunctive relief when necessary. Qualified individuals should be authorized to practice as an attorney and counselor-at-law in the State of New York.

Administrative Assistant – Responsible for administrative activities and providing assistance to the Commissioner of Public Works and the Deputy Commissioner of DPW and Sewer. Qualifications include experience in municipal government and data management.

Deputy Commissioner of DPW (Deputy Commissioner)- Responsible for engineering activities and coordination of monitoring. Duties include evaluating data submitted by IUs to the City, and reviewing monitoring and sample analysis conducted by the POTW. This individual will be responsible for staffing and supervising field monitoring activities. Qualifications for this role include experience in field monitoring and sampling, wastewater treatment, and sewer collection systems.

Chief Operator – Responsible for laboratory activities and analysis. Qualifications include familiarity with sampling techniques and coordination with sampling laboratories. Sampling will be contracted through a commercial laboratory for analytical services. Laboratories must be certified by the State of New York and conduct tests in accordance with EPA approved methods.

## 2.3 Coordination with Other Departments

The administration of this program will be led by the Commissioner of Public Works. Coordination of information and requirements will be led by the Commissioner who oversees the City's Building Department and POTW.

The Commissioner is also available to offer comment to the Common Council and Planning Board on matters related to pretreatment requirements.

## 2.4 Major Equipment used in Program

The program will utilize existing City-owned vehicles for transportation during monitoring activities. In addition, the City may utilize Isco samplers for required data collections from IUs and additional sampling required for the IPP.

## Section 3

# Program Costs and Funding Mechanisms

### 3.1 Estimated Program Costs

The pretreatment program costs will be divided into recurring costs for labor and maintenance and as-needed laboratory fees. The estimated recurring program costs to implement the pretreatment program can be found in Table 1 below.

**Table 1-Estimated IPP Costs**

Estimated Yearly Industrial Pretreatment Program Costs	
Item	Total Per Year
Labor	\$11,800.00
Operations and Maintenance	\$8,000.00
Transportation	\$500.00
<b>Total Yearly Costs</b>	<b>\$20,300.00</b>

The costs associated with sampling of industrial wastewater will be charged on an as-needed basis to the individual IUs. Estimated laboratory costs will be established annually in fee schedule.

### 3.2 Financing Sources and Cost Recovery Systems

The financing of the pretreatment program will be divided into permit and renewal fees, and as-needed fees for testing and services.

The first-year start-up costs will be funded through the City's existing Sewer Fund, fees for applications, and fees for permits.

The City will charge all Categorical users, significant users (discharges over 25,000 gals/day), users requiring a grease trap, and users requiring an oil and grease separator a flat fees to cover costs of the pretreatment program, see Table 2 below for fee schedule. The total yearly service charge will be based on the proceeding year's costs and total number of IUs regulated under the program. This fee schedule will be updated and published yearly.

The City will back-charge individual IUs for costs incurred (attributable to individual IUs) on an as-needed basis. Such costs are expected to include laboratory costs, data analysis associated with sampling, labor hours to conduct special inspections, and technical assistance.