

TOWN OF TORREY BOARD

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January 10, 2018

New York State DEC
Ms. Teresa Diehsner
625 Broadway
Albany New York 12233

Dear Ms. Diehsner,

On behalf of the approximately 1300 residents of the Town of Torrey, we appreciate the opportunity to comment on the proposed changes to the SPEDES permit NY 0029726.

The Waste Water treatment plant (WWTP) flows East through the towns of Milo and Torrey emptying into Seneca Lake at the Village of Dresden. The WWTP releases its effluent into the Keuka Outlet affecting the shoreline residents source of potable water. Currently Seneca Lake in this area is rated Class B, because of this contamination, while the rest of the lake enjoys a Class AA rating and provides a drinking water source to 100,000 people.

Another concern is the close proximity of the town park and public beach area which is used for public swimming and summer youth programs. There is also a 7 mile nature trail along the outlet which the public enjoys and provides an economic benefit to the adjacent businesses.

The importance of the health of the Keuka Outlet to the residents of the Town of Torrey cannot be overstated. Recent additions to the Village of Penn Yan of three (3) 60 room hotels, as well as the approval of 40 condominium units and the addition of the KANPAK manufacturing facility gives rise to increased concerns about the amount of effluent released into the outlet and the further contamination of the drinking supply.

The WWTP Compliance history shows it is already exceeding their existing SPEDES permit limits, while the new permit corrects this by increasing the allowable limits.

The Town of Torrey has recently sampled 30 residents water source on the North and South shoreline. The bacteriological report showed positive tests for E coli and coliform in 80% of the cases.

In summary, we wish to note the following:

- the Keuka Outlet is not just a recreation source but a drinking water contributor
- the Keuka Outlet is 35% of the inflow to Seneca Lake

- on August 24,2017 there was a 35,000 gallon spill into the outlet
- there is no mechanism in place to alert shoreline residents in the event of another spill.
- New permit levels allow a 35% increase in phosphorous which combined with the warm water discharge from a downstream power plant will certainly increase the Harmful Algal Blooms (HABs) in the Dresden area. Most of the 60 blooms in the 2017 report were certified to contain high toxins.
- New permit requires no more than 200 coliform colonies per 100 ml but current certified testing shows this number to exceed 100,000
- WWTP current disinfection system is unused the proposed WWTP disinfection system is required to be online only 6 months of the year disregarding the fact it is a drinking water source 12 months of the year.
- The remediation required in the new permit is to occur by May 1, 2022 is too long based on the current conditions.

We look forward to your response to how the DEC will address the above concerns.

On behalf of the Torrey Town Board and residents I am,

Respectfully yours,

Patrick H. Flynn