

# Conversion of a Conventional Activated Sludge Facility to EBNR and Effluent Quality that will Surprise



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# Since 2004, UBWPAD has Spent \$180 Million to Upgrade and Expand Wastewater Treatment Facility



# In 2009, Upgrades Were Put On-Line On Schedule

## In 2012, District Received NACWA Peak Performance Award

	2001 Permit	Actual (FY2012)
Flow (mgd)	56*	33.1
Total Phosphorus (mg/L)		
Summer	0.75	0.54
Winter	Report	0.44
Total Nitrogen (mg/L)		
Summer	No limit	4.1
Winter	No limit	4.3

\* Facility designed for an average daily flow of 45 mgd



# A Success Story.....?



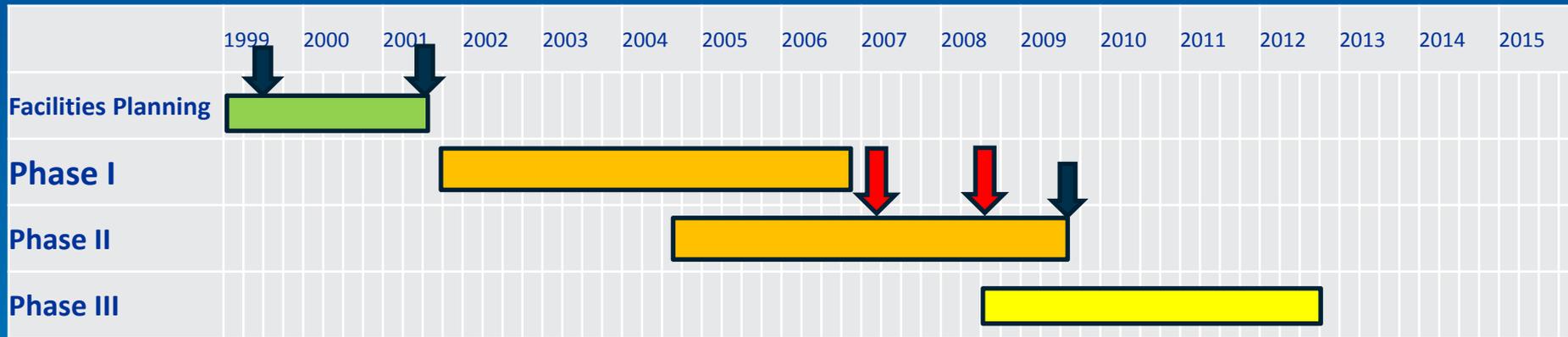
# But....In the Midst of Construction EPA Issued New NPDES Permit with Extreme Nutrient Limits

	2001 Permit	2008 Permit
Flow (mgd)	56*	56*
Total Phosphorus (mg/L)		
Summer	0.75	0.1
Winter	Report	1.0
Total Nitrogen (mg/L)		
Summer	No limit	5
Winter	No limit	No limit

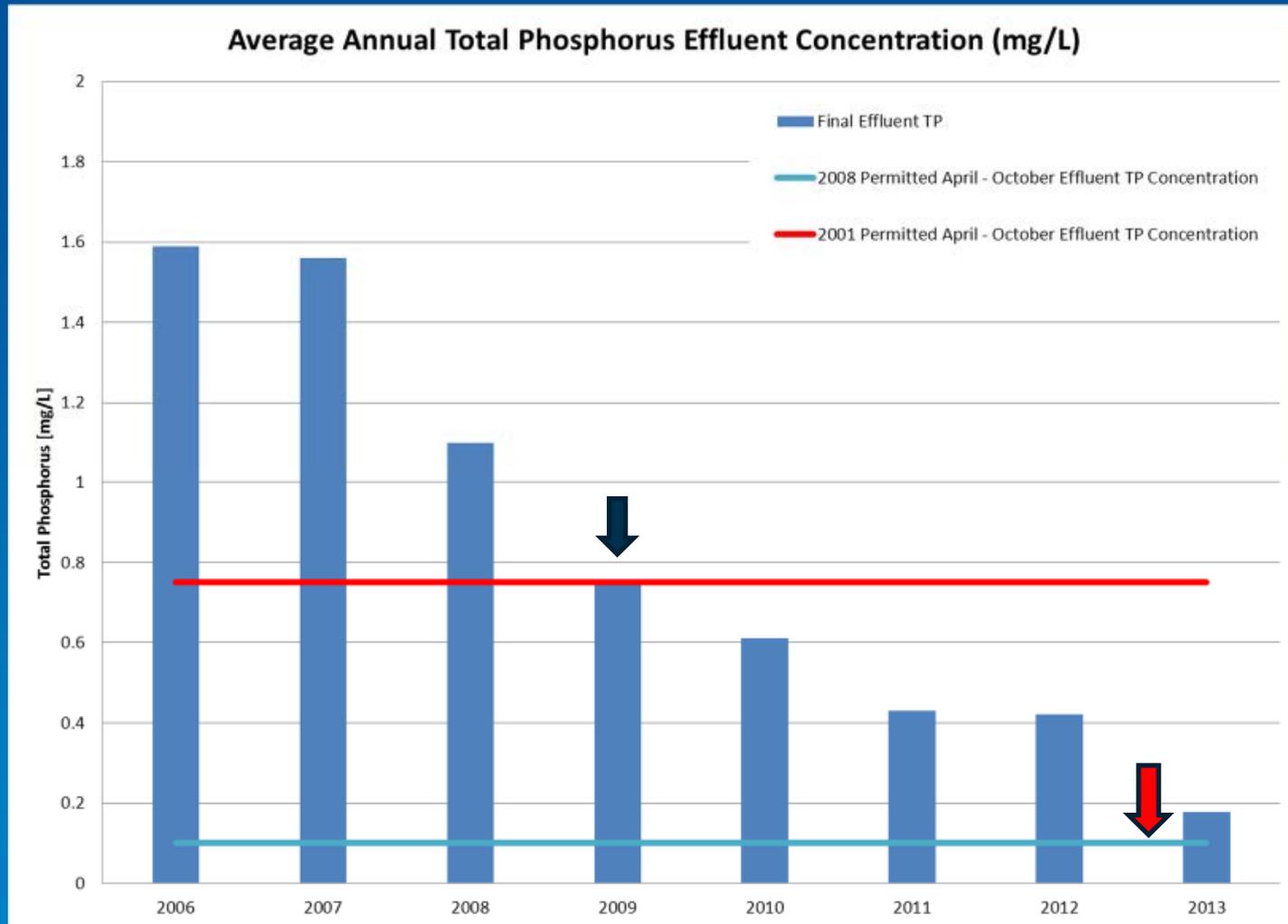
- District Contested
  - Timing of the permit was Illogical
  - No scientific basis for permit limits
  - Meeting limits would result in extreme economic and environmental impacts

\* Facility designed for an average daily flow of 45 mgd

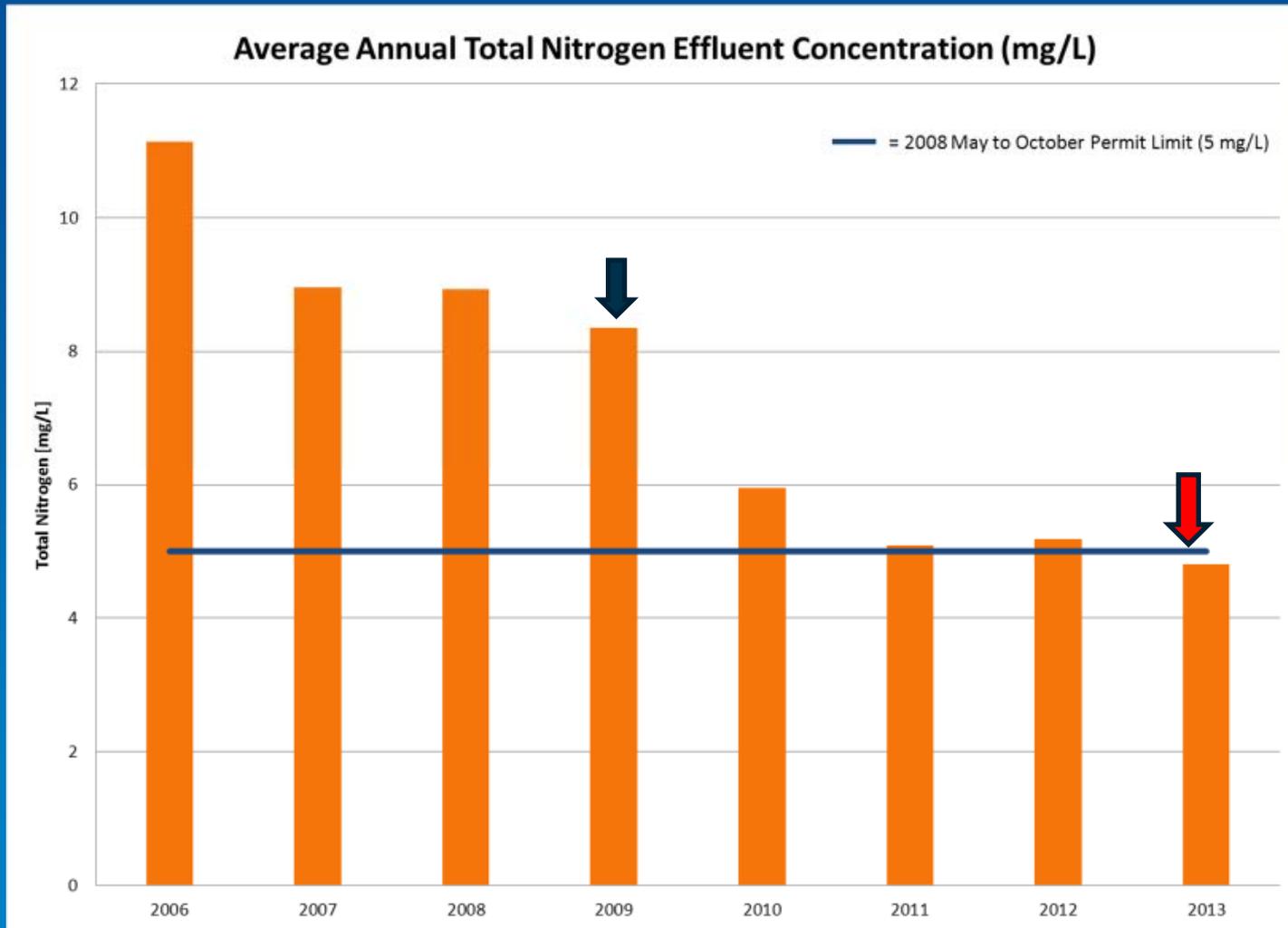
# Schedule – Timing of the Permit was Illogical



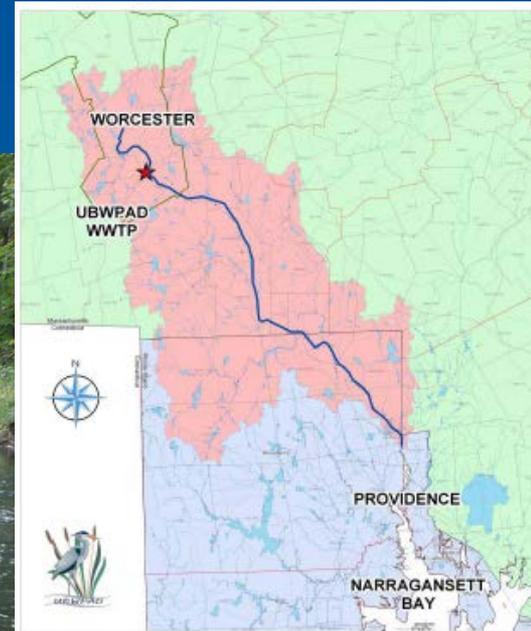
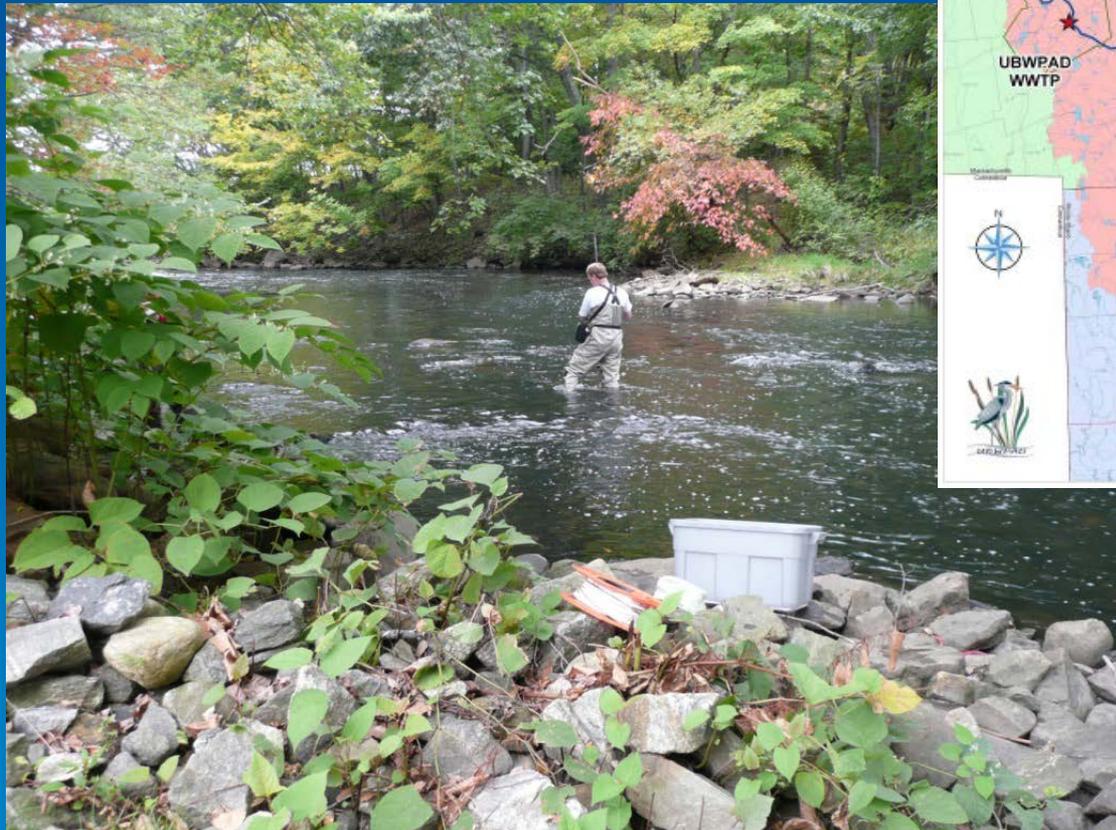
# District Continues to Improve Performance of Biological Nutrient Removal (BNR) Process



# Total Nitrogen Limit Established in 2008 Permit Nearly Being Met



# EPA's 2008 Permit Had No Scientific Basis, District's Model Showed NPS and Dams Drive Water Quality

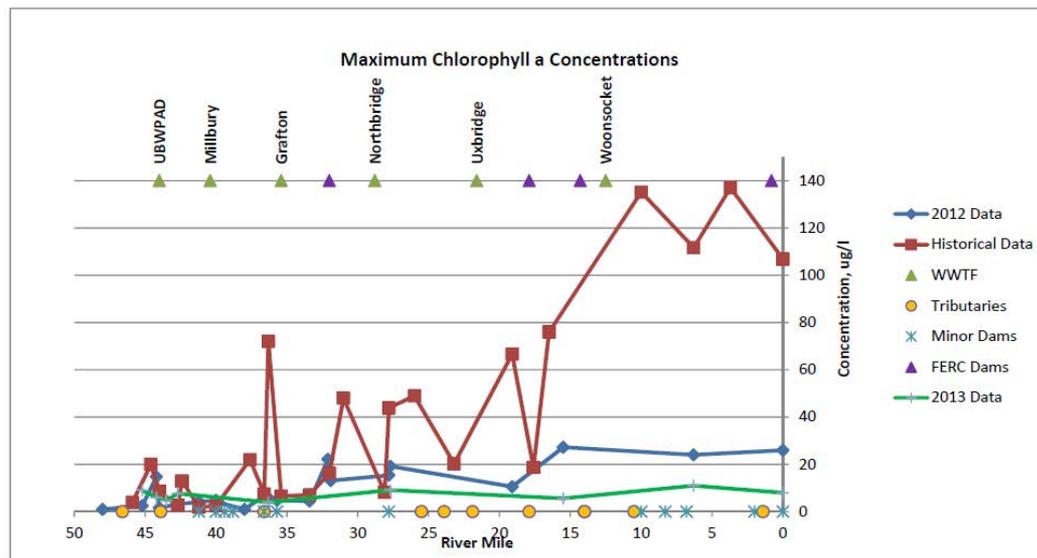
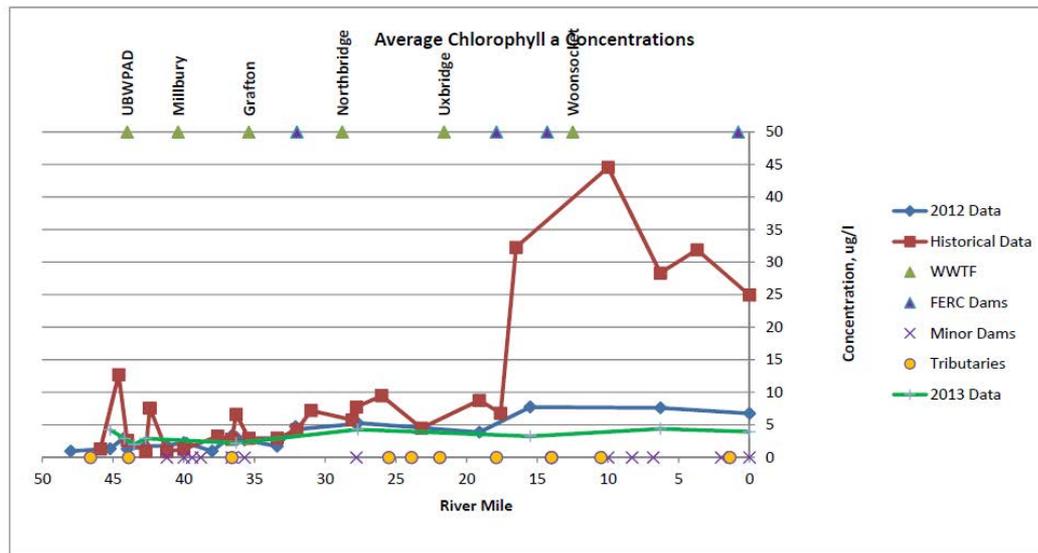


**Blackstone River Watershed  
Providence County, RI  
and Worcester County, MA**

# River Response

In-stream Chlorophyll a Concentrations Have Reduced in Response to Improved Effluent Quality

2013 Sampling Data Through 9/25/2013



# In 2007 Estimated Extreme Economic and Environmental Impact of Necessary Improvements

- \$200 Million Capital Cost
- \$5 million O&M cost
- 20% increase in power consumption
- 50% increase in sludge production
- Four-fold increase in ash production
- 5 additional 8,000-gallon tanker truck deliveries daily
- 14% increase in NOx production

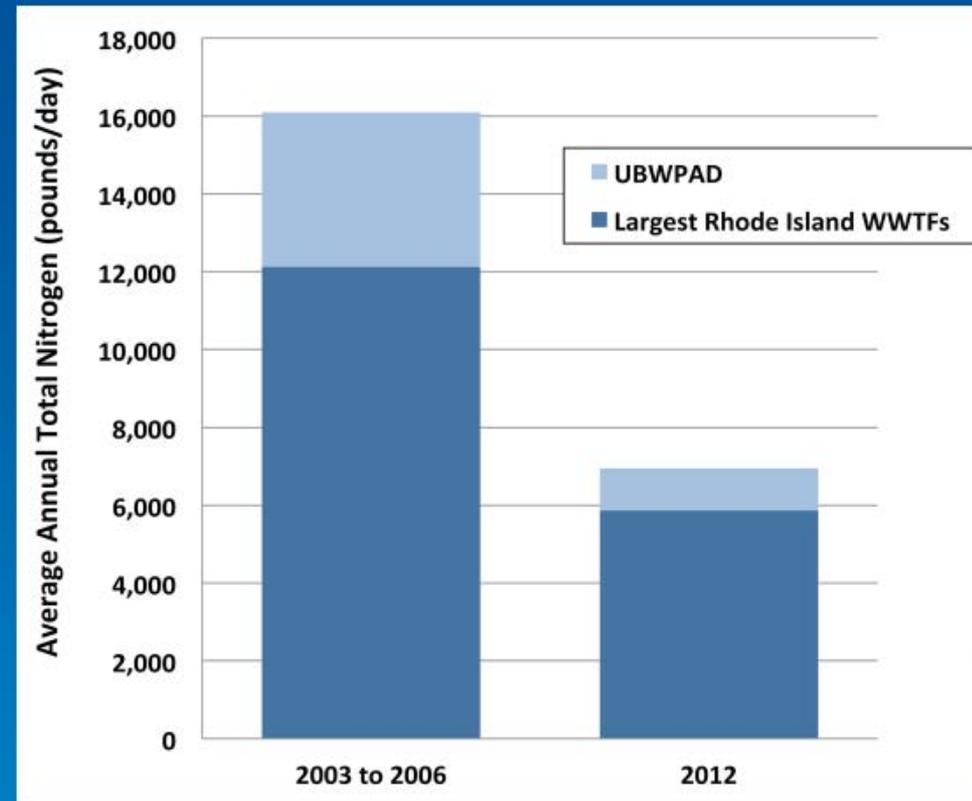


# The District Currently Commencing Piloting of Sustainable Solutions to Meet 2008 Permit

- Operational Modifications
  - Step Feed
  - Real-time Control
  - Magnesium Hydroxide for Alkalinity Control
  - 5-stage Bardenpho
- Targeted Chemical Addition
  - Supplemental carbon
  - Ferric prior to dewatering
- Algae Treatment

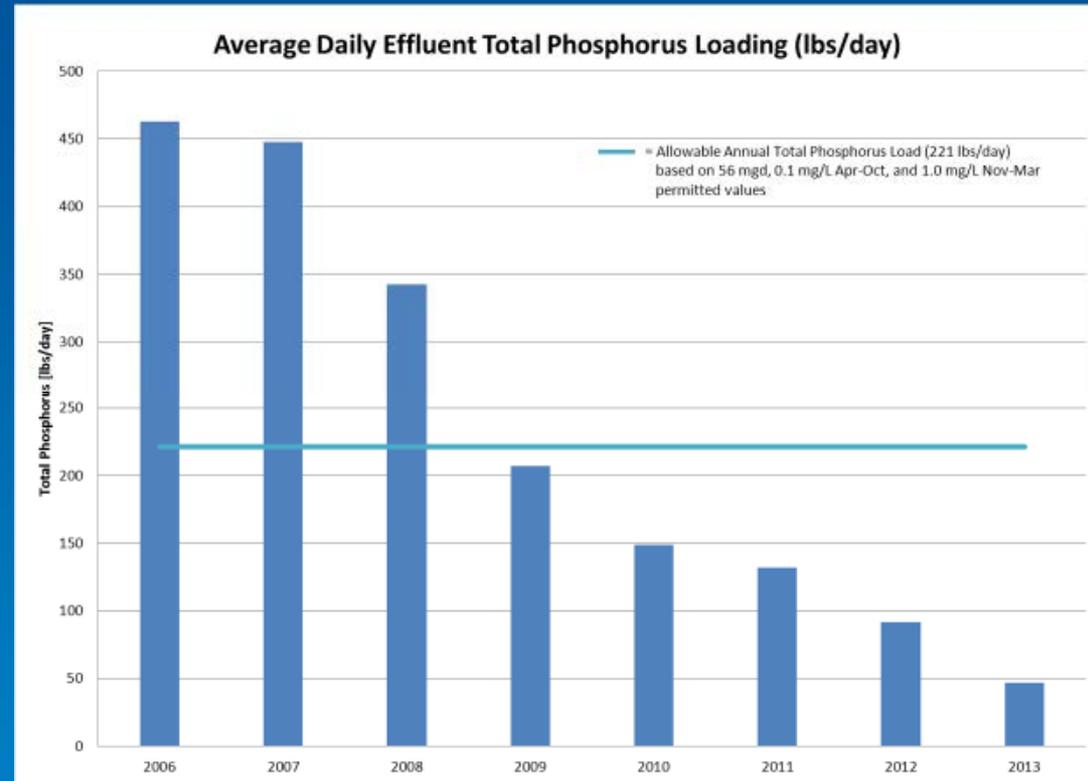
# Lessons Learned

- Negotiate no change in limits for the term of the Administration Order
- Establish water quality criteria that need to be achieved with regulators prior to setting limits



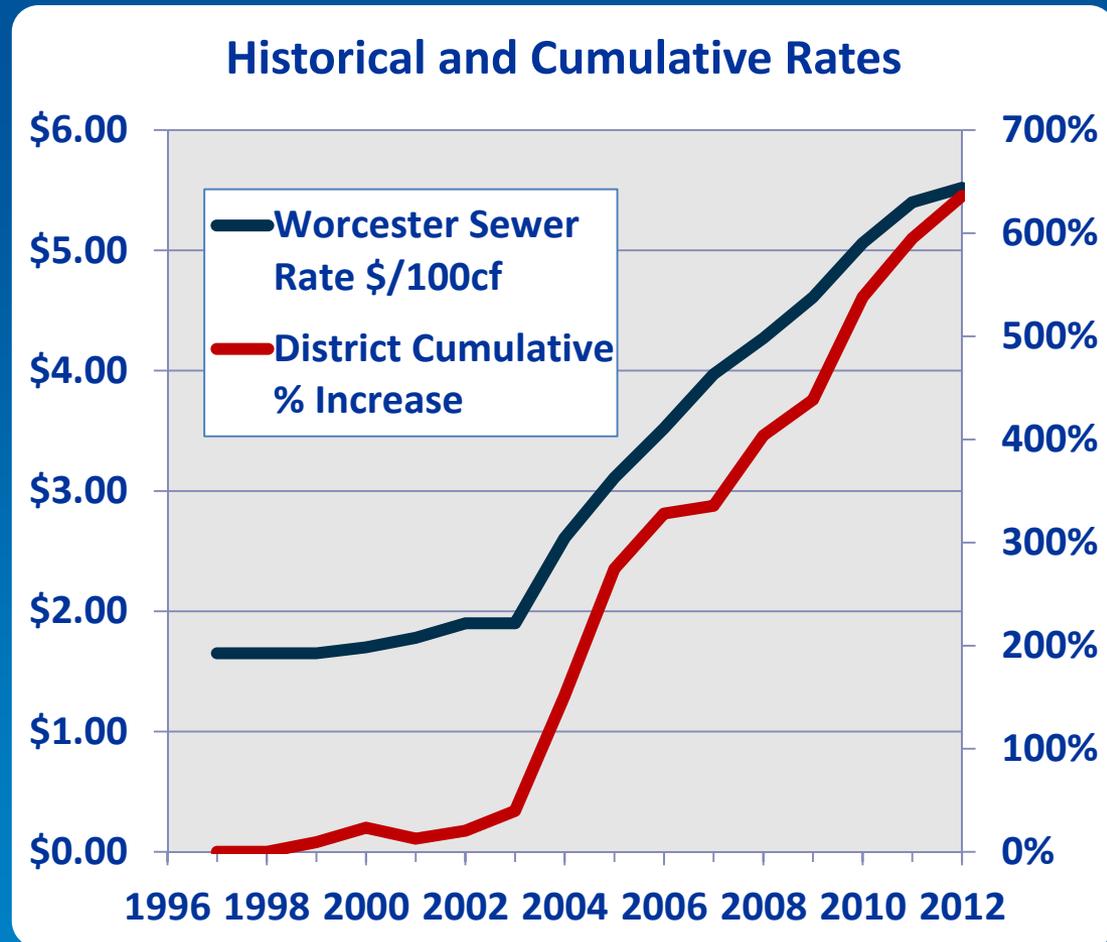
# Lessons Learned

- Take an active role in river modeling and engage the regulators
- Understand how permit limits are written, as this can significantly impact compliance



# Lessons Learned

- Educate EPA with respect to cost-benefit of suggested permit limits (including environmental cost)
- Push for the use of Integrated Planning to prioritize improvements and spend money in the right place



# Questions/Discussion

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