

**STATE OF NEW YORK
DEPARTMENT OF ENVIRONMENTAL CONSERVATION**

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In the Matter of the Violations of Article 17 of the Environmental Conservation Law and Part 750, *et seq.*, of Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York:

**ORDER ON
CONSENT**
(CSO Order
Modification to
CO2-20000107-8)

-by-

The City of New York and
The New York City Department of Environmental Protection,

DEC Case No.
CO2-20140314-01
(26 Ward & Wards Island)

Respondents.

_____ X

WHEREAS:

1. The Department of Environmental Conservation (“the Department”) is a Department of the State of New York with jurisdiction to enforce the environmental laws of the State, pursuant to the Environmental Conservation Law (“ECL”), Title 6 of the Official Compilation of Codes, Rules and Regulations of the State of New York (“6 NYCRR”), and Orders issued there under.

2. The Department has jurisdiction over the abatement and prevention of pollution to the waters of the State pursuant to Article 17 of the ECL and 6 NYCRR Part 750, *et seq.* This jurisdiction also authorizes the Department, as a State agency with an approved program per Sections 318, 402 and 405 of the federal Clean Water Act (“CWA”), 33 U.S.C. Section 1251, *et seq.*, to regulate the discharge of pollutants from point sources into waters of the State in conformity with the CWA.

3. Pursuant to its authority to protect the waters of the State, the Department administers the State Pollutant Discharge Elimination System (“SPDES”) permit program, ECL §17-0801, *et seq.* In general, the SPDES program prohibits any discharge of pollutants to the waters of the State without a permit establishing pollutant limitations and treatment requirements. Thus, SPDES permits set certain effluent limitation parameters, determined according to ECL §17-0809 and 6 NYCRR Part 750-1.11, in order to avoid contravention of mandated water pollution control requirements and water quality standards (“WQS”). Those conditions address not only the allowable range of parameters for discharge of pollutants to waters of the State, but also the manner in which the permittee is to operate, maintain, monitor and report on its regulated facilities and activities.

4. Combined sewer overflows (“CSOs”) are discharges of untreated domestic sewage from combined sewer systems, and industrial wastewaters, combined with stormwater. CSOs occur when wet weather flows are in excess of the capacity of combined sewer systems and/or the

Water Pollution Control Plants they serve. CSO discharges can contribute to violations of state WQS. CSO outfalls are "point sources" subject to SPDES permit requirements, including both water quality-based and technology-based requirements of the CWA.

5. The New York City Department of Environmental Protection ("DEP"), a municipal agency, and the City of New York ("the City") (collectively referred to herein as "Respondents") own, operate and are responsible for the Respondent's 14 Wastewater Treatment Plants (collectively referred to as the "WWTPs"). Collectively, these WWTPs process approximately 1.4 billion gallons of sewage per day generated within New York City. Wards Island and 26th Ward are two of the 14 WWTPs within the City for which Respondents are responsible.

6. Previously, the Department and Respondents entered into Orders on Consent to address CSO discharges dated June 26, 1992 (Case No. R2-3351-90-12), September 19, 1996 (Case No. R2-3351-90-12), January 14, 2005 (Case No. CO2-20000107-8), (hereinafter referred to as the "2005 CSO Order"), April 14, 2008 (Case No. CO2-2007-0101-1), September 3, 2009 (Case No. CO2-20090318-30), and March 8, 2012 (Case No. CO2-20110512-25) hereinafter referred to as the "2012 CSO Order") (collectively referred to as the "CSO Orders").

7. Respondents are continuing to perform work pursuant to the CSO Orders, including work at the 26th Ward WWTP.

8. Respondents timely completed certain stabilization work at the Bronx and Manhattan grit chambers for the Ward's Island WWTP by December 31, 2013 pursuant to the First Amended Nitrogen Consent Judgment (Index No. 04-402174) (Nitrogen Judgment), Appendix A, Milestone 16.

26th Ward WWTP Wet Weather Stabilization Project

9. Respondents have violated the terms of the 2012 CSO Order by failing to meet the Appendix A milestone XII.K.5 for Design Completion of Jamaica Bay CSO, 26th Ward Wet Weather Stabilization Project by April 30, 2013.

10. On March 1, 2013, Respondents submitted a modification request to extend milestone XII.K.5 for Design Completion for the 26th Ward WWTP Wet Weather Stabilization project, until April 30, 2015 to provide Respondents additional time to complete the final design due to procurement of a new design consultant. The Department issued a DEC Determination and Notice of Violation ("26th Ward NOV") on June 10, 2013. The 26th Ward NOV was contested by Respondents in accordance with the terms of the 2005 CSO Order.

11. Pursuant to Paragraph V. of the 2005 CSO Order, the Department shall have judgment against Respondents, and Respondents consent to entry of judgment, for a stipulated penalty in amounts set forth in the Paragraph V, for each day that Respondents violate a requirement of the CSO Orders.

12. This settlement resolves the 26th Ward NOV issued June 10, 2013 by the Department and delays associated with Milestone XII. K.4., "Initiate design for 26th Ward Wet Weather

Stabilization” in Appendix A of the 2005 CSO Order. In accordance with the settlement, the Department has agreed to modify Appendix A, Milestones XII. K. 5 through 9 and accept the delays associated with Respondent’s discretionary decision to change the design consultant for the 26th Ward Wet Weather Stabilization project under Milestone XII. K. of the 2012 CSO Order.

Wards Island WWTP SPDES Permit # NY0026J3

13. In 1995, the Wards Island WWTP’s SPDES permitted dry weather flow was 250 million gallons per day (“MGD”), and the WWTP was rated for 500 MGD for wet weather flow, calculated as twice the design dry weather flow (2XDDWF). Also in 1995, DEP added E-Battery to the Wards Island WWTP, consisting of one aeration tank and three final tanks, to increase dry weather flow capacity to 275 MGD. DEP has not made any corresponding upgrades to the headworks, distribution, or primary tanks to increase the wet-weather capacity in the aeration and final tanks at the Wards Island WWTP. However, in 2003, the SPDES permit for the Wards Island WWTP was revised to include a wet weather flow requirement of twice the expanded dry weather flow, *i.e.* 550 MGD. Since 1995, average dry weather flows to the WWTP have dropped to approximately 190 MGD.

14. Respondents undertook certain work to stabilize the Manhattan and Bronx grit chambers for the Wards Island WWTP to improve the reliability of these facilities to deliver flow to the WWTP and to protect equipment at the Wards Island WWTP. The stabilization work consisted of replacing all mechanical equipment in the grit chambers channels, including the influent bar screens and grit collection equipment. While the stabilization work was ongoing, the grit chambers’ capacity to convey wet weather flows was reduced, which impacted the influent sewage flow levels received at the Wards Island WWTP. The Respondents requested and were granted interim flow levels for the Wards Island WWTP during the time period the stabilization work was conducted under the Nitrogen Consent Judgment. The interim flow limits required that the Wards Island WWTP be capable of receiving a minimum of 420 MGD to be calculated as a average wet weather flow in accordance with the procedures set forth in the approved WWOP.

15. Respondents completed the stabilization work at the Manhattan and Bronx grit chambers in December 2013. During and subsequent to completion of this work, the Respondents determined that due to the increased volume of rags, personal wipes and debris in the influent, the new bar screens performance adversely impacted the capacity of the grit chambers to convey wet weather flows to the WWTP. Blinding of the bar screens with rags, disposable wipes and debris often resulted in flooding of the floor in the grit chambers, which can pose significant risk of damage to the Main Sewage Pumps and Primary Tanks in the WWTP and a subsequent risk of destabilizing treatment upon return to dry weather operation. The flooding of the grit chambers is also a risk to worker safety at the WWTP. Respondents have completed design for a new project to replace the existing bar screens with a “Travelling Bridge-type” bar screen at the Manhattan and Bronx grit chambers; DEP will also repair and improve the existing grit removal system. Respondents anticipate that this work will improve the reliability of the screens and reduce the potential for blinding of the screens and subsequent flooding at the Bronx and Manhattan grit chambers. Respondents also intend to replace the Main Sewage Pumps (MSPs) that pump the flow that passes through the grit chambers to the primary tanks in the WWTP.

The bar screen and MSP work shall be referred collectively hereinafter as “Wards Island WWTP Headworks Wet Weather Improvements.” Respondents anticipate that for the duration of the Wards Island WWTP Headworks Wet Weather Improvements work the amount of flow that can be conveyed through the WWTP headworks during wet weather will be reduced. The Respondents requested interim flow limits for the time period until Wards Island WWTP Headworks Wet Weather Improvement work is completed, retroactive to the date of completion of the grit chamber stabilization work under the Nitrogen Consent Judgment. The Department agreed to exercise enforcement discretion and extend the 420 MGD interim wet weather flow limit from December 20, 2013 through June 7, 2014. As set forth herein, the parties have agreed to interim flow limits effective upon the issuance of the Notice to Proceed for the Wards Island WWTP Headworks Wet Weather Improvements work and shall remain in effect until June 2018, or at such time as Respondents complete the Wards Island WWTP Headworks Wet Weather Improvements set forth in Revised Appendix A, whichever event occurs first.

16. The Department agrees that it is in the long-term interest of the public, the environment, and worker safety to establish new interim flow limits to reduce the minimum required wet weather flow for the Bronx and Manhattan grit chambers at the Wards Island WWTP to allow the Wards Island WWTP Headworks Wet Weather Improvement work to proceed.

17. The Department has determined that it is not necessary to modify the Nitrogen Consent Judgment because Respondents have timely completed the stabilization work at the grit chambers required under that Judgment. The planned Wards Island WWTP Headworks Wet Weather Improvement work is directly related to maximizing flows to the WWTP required under the CSO Best Management Practices in the SPDES permit. Therefore, the parties agree that the planned Wards Island WWTP Headworks Wet Weather Improvements work is most appropriately included in the CSO Order.

18. The Department and Respondents have each consented to the making of this Order, which modifies the CSO Orders, without further action, litigation, hearing or adjudication of any issues of law or fact, being duly advised, and it being in the public interest and advantageous to the State.

IT IS HEREBY ORDERED:

I. EFFECT ON PREVIOUS ORDERS

Respondents are bound by, and agree to follow and comply with the terms, provisions and requirements set forth in this Order, including the modified and new milestone dates in Revised Appendix A and the interim flow requirements set forth below in Article V. This Order modifies and replaces only those portions of the CSO Orders as set forth in Article IV and V below and Revised Appendix A. All other provisions of the CSO Order shall remain in full force and effect. The requirements set forth in this Order are additional to, and do not affect any requirements set forth in any other Orders on Consent between the Department and Respondents.

II. CIVIL PENALTY

26th Ward WWTP Wet Weather Stabilization Project

In settlement of all violations and the modification request described above in paragraphs 9 and 10, Respondents shall pay a civil penalty in the sum of two hundred thousand dollars (\$200,000). The civil penalty shall be paid within 45 days of the Department’s execution of this Order, by check made payable to the order of the “New York State Department of Environmental Conservation,” which shall be forwarded to the Department of Environmental Conservation, 625 Broadway, 14th Floor, Office of General Counsel, Albany, NY 12233-1500, attention: Ms. Elissa Armater, with a copy to Ms. Mary vonWergers, Esq. at the same address. Respondents are also subject to suspended penalties totaling one million dollars (\$1,000,000). That total amount will be divided into four payments of two hundred and fifty thousand dollars (\$250,000) each associated with Respondents’ compliance with each of the following new milestones; XII.K.6, XII.K.7, XII.K.8, and XII.K.9, as further described below in Article III. In the event Respondents fail to meet any one of the new milestones, a payment of \$250,000 per milestone shall be made within 45 days of written demand by the Department for the applicable milestone.

III. SUSPENDED PENALTIES

26th Ward WWTP Wet Weather Stabilization Project

Respondents shall pay the following amount if Respondents fail to timely comply with the corresponding milestone (“Trigger Milestone”) in the table below, which milestone is set forth in Revised Appendix A to this CSO Order:

<u>Suspended Penalty Amount</u>	<u>Trigger Milestone</u> Funds paid if Respondents fail to timely comply with the corresponding milestone.
\$250,000	XII.K.6 NTP to construction for HLMSPs on 6/30/2015
\$250,000	XII.K.7 Construction completion for HLMSPs on 7/31/2018
\$250,000	XII.K.8 NTP to construction for 26W Reliability Improvements to PSTs #1 to 4 and Construction of PST #5 on 1/31/16
\$250,000	XII.K.9 Construction completion for 26W Reliability Improvements to PSTs #1 to 4 and construction of PST #5 on 7/19/20

If Respondents fail to comply with a Trigger Milestone, then the corresponding Suspended Penalty Amount shall become payable by Respondents to the Department as an ordinary civil penalty, within 45 days of Respondents receiving written direction from the Department to make payment. Additional stipulated penalties shall be assessed for missed Trigger Milestones in accordance with Paragraph V of the 2005 CSO Consent Order.

IV. COMPLIANCE SCHEDULE

26th Ward WWTP Wet Weather Stabilization Project and Wards Island WWTP Headworks Wet Weather Improvements Project

A. Respondents are permanently enjoined and directed to complete the tasks and meet the milestones set forth in Revised Appendix A of this Order, which is incorporated herein and attached hereto.

B. The name of the project is hereby changed from “26th Ward WWTP Wet Weather Stabilization” to “26th Ward WWTP Preliminary Treatment Reliability Improvements”.

C. There shall be no change to the CSO Orders, except as indicated in paragraph 12, Sections III and V, and Revised Appendix A of this Order. Respondents shall strictly comply with all the milestones set forth in Revised Appendix A. The implementation and enforcement of the activities required by these milestones shall be governed by the terms of the 2005 Order.

D. Upon effective date of this Order modification, Appendix A of the 2012 CSO Order shall be modified by the pages set forth in the Revised Appendix A of this Order. The pages of Revised Appendix A shall be substituted for the corresponding pages of Appendix A of the 2012 CSO Order as appropriate.

V. Wards Island WWTP SPDES Permit # NY0026J3 Interim Flow Limits

A. Respondents shall comply with the wet weather interim flow limits set forth below in Section V.B. for the Wards Island WWTP (the “Interim Flow Limits”). The interim flow limits shall be effective upon issuance of the first notice to proceed to construction for the work proceeding that comprises the Wards Island WWTP Headworks Wet Weather Improvement work as noted in Section V.B. below and shall remain in effect until June 2018, or at such time as Respondents complete the Wards Island WWTP Headworks Wet Weather Improvement Project set forth in Revised Appendix A, whichever event occurs first.

B. Interim Flow Limits:

All interim wet weather flow limits set forth below shall be calculated in accordance with the terms of the 2014 CSO BMP Order.

- a. Commencing upon DEP certification of the issuance of either (i) the Notice to Proceed to Construction for the Grit Chamber Bar Screens or (ii) the Notice to Proceed to Construction for the Replacement of the Main Sewage Pumps, whichever is earlier, and to remain in effect until DEP certification that two (2) new bar screens at each grit chamber are in operation and four (4) new MSPs are available for service, the WWTP shall be capable and operated to receive and treat an average flow of 320 MGD during wet weather.
- b. Commencing upon DEP certification of completion of two (2) new bar screens at each grit chamber and four (4) new MSPs, and to remain in effect until DEP certification of construction completion of the Wards Island WWTP Headworks Wet Weather Improvements, the Wards Island WWTP shall be capable of receiving, and must be operated to receive and treat an average of 420 MGD during wet weather.

C. Respondents shall undertake and submit within 24 months from the effective date of this Modification, a hydraulic capacity analysis of the capability of the WWTP to maximize flows and treat an average of twice the Design Dry Weather Flow (2XDDWF) at the WWTP as defined under the CSO Best Management Practices in the SPDES permit and 2014 CSO BMP Order on Consent. As part of the hydraulic analysis, DEP will evaluate all treatment processes and complete an engineering analysis of potential improvements to reliably achieve 2XDDWF. DEP may analyze re-rating the dry weather hydraulic capacity and peak hydraulic wet weather capacity of the WWTP. ~~Such an analysis does not exempt DEP from existing SPDES requirements except as set forth herein.~~

D. Upon the earlier of June 2018 or the date that the Respondents provide notice of complete construction for Revised Appendix A, XV.3 milestone of this Order, the limit for the flow levels during wet weather shall be the limit set forth in the Wards Island WWTP SPDES permit #NY0026131.

VI. Stipulated Penalties

A. If the City fails to comply with the Interim Flow Limits as set forth in Section V.B. to this CSO Order modification, the Department shall have judgment against the City and the City consents to entry of a judgment for a stipulated penalty in the amount of \$2,000 per day.

VI. EFFECTIVE DATE

The effective date of this Order modification shall be the date it is executed by the Department's Commissioner or his designee.

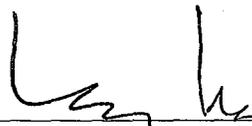
DATED: March 26, 2015
Albany, New York

Joseph J. Martens, Commissioner
New York State Department of
Environmental Conservation

By: James M. Tierney
James M. Tierney
Assistant Commissioner

CONSENT BY RESPONDENTS

The New York City Department of Environmental Protection hereby consents to the issuance and entry of the foregoing Order, waives its right to a hearing herein as provided by law, and agrees to be bound by the provisions, terms and conditions contained herein.



Emily Lloyd, Commissioner
New York City Department of
Environmental Protection

02/26/15

Date

ACKNOWLEDGMENT

State of New York)
County of QUEENS) ss.:

On the 26 day of February, 2015 before me personally came Emily Lloyd to me known, who being by me duly sworn did depose and say that s/he was duly authorized to execute the foregoing instrument and did so on behalf of the Respondents of New York.

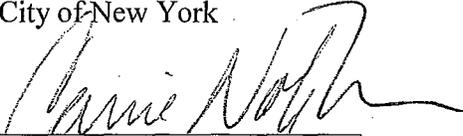


Notary Public
RUSSELL PECUNIES
Commissioner of Deeds
City of New York No. 4-6227
Commission Expires 1.1.16

CONSENT BY RESPONDENTS

The New York City Corporation Counsel hereby consents to the issuance and entry of the foregoing Order without further notice, waives its right to a hearing herein, and agrees to be bound by the terms, conditions and provisions hereof.

Zachary W. Carter
Corporation Counsel of the
City of New York

By: 
Title: ASSISTANT CORPORATION COUNSEL

3/3/2015
Date

ACKNOWLEDGMENT

State of New York)
County of) s.:

On this 3rd day of March, 2015, before me personally came Gamine Noreboom, to me known, who being duly sworn, deposed and stated that s/he maintains an office at 100 Church Street, New York, New York, that s/he is an Assistant Corporation Counsel, Environmental Law Section of the New York City Corporation Counsel, and that s/he was authorized by said Department to execute the foregoing instrument.

Gail C Saunders
Notary Public

GAIL C. SAUNDERS
Notary Public, State of New York
No. 02SA5048874
Qualified in New York County
Commission Expires Sept. 5, 2017

REVISED APPENDIX A
 DEC Case No. CO2-20140314-01

XII. Jamaica Bay CSO	Milestone Date	Revised/Added Milestone Date
A. Facility Plan Development		
1. Submit Modified Facility Plan Report	December 2003	
B. Comprehensive Watershed Planning		
1. Submit Approvable Jamaica Bay Waterbody/Watershed Facility Plan Report	June 2007	
2. Submit Approvable Spring Creek Waterbody/Watershed Facility Plan Report	June 2007	
3. Submit Approvable Fresh Creek Waterbody/Watershed Facility Plan Report	June 2007	
4. Submit Approvable Hendrix Creek Waterbody/Watershed Facility Plan Report	June 2007	
C. Spring Creek AWPCP Upgrade		
1. Initiate Final Design	April 1998	
2. Final Design Completion Including CPM Analysis	February 2002	
3. Submit Form 2A SPDES Application	June 2003	
4. Notice to Proceed to Construction	March 2003	
5. Construction Completion	April 2007	
D. 26th Ward Drainage Area Sewer Cleaning and Evaluation		
1. Initiate Final Design	January 2007	
2. Final Design Completion Including CPM Analysis	June 2007	
3. Notice to Proceed to Construction	June 2008	
4. Construction Completion	June 2010	
E. Hendrix Creek Dredging		
1. Initiate Final Design	January 2007	
2. Final Design Completion Including CPM Analysis	June 2007	
3. Notice to Proceed to Construction	February 2010	
4. Construction Completion	February 2012	
F. 26th Ward Wet Weather Expansion		
1. Initiate Final Design	June 2006	
2. Final Design Completion Including CPM Analysis	DELETED	
3. Submit Form 2A SPDES Application	DELETED	

REVISED APPENDIX A
DEC Case No. CO2-20140314-01

4. Notice to Proceed to Construction	DELETED
5. Construction Completion	DELETED
G. Rockaway WPCP and associated sewer system are capable of delivering, accepting and treating influent at or above twice the plant's design flow during any storm event	
1. Construction Completion	December 2017
H. Submit 26th Ward Alternative Feasibility Study	December 2010
I. 26th Ward High Level Sewer Separation	
1. Submit Drainage Plan	September 2012
2. Phase 1 - Initiate Design	December 2012
3. Phase 1 - Design Completion	March 2015
4. Phase 1 - Notice to Proceed to Construction	March 2016
5. Phase 1 - Construction Completion	December 2018
6. Phase 2 - Initiate Design	April 1, 2015
7. Phase 2 - Design Completion	March 2017
8. Phase 2 - Notice to Proceed to Construction	March 2018
9. Phase 2 - Construction Completion	December 2020
10. Phase 3 - Initiate Design	April 1, 2017
11. Phase 3 - Design Completion	March 2019
12. Phase 3 - Notice to Proceed to Construction	March 2020
13. Phase 3 - Construction Completion	December 2022
J. Green Infrastructure Demonstration Project in 26th Ward Sewershed	
1. Submit Engineering Report and Design	March 2012
2. Notice to Proceed to Construction	June 2012
3. Complete Construction	December 2012
4. Submit Phasing of PCM Report	October 2013
K. 26th Ward WPCP Wet Weather Stabilization Preliminary Treatment Reliability Improvements	
1. Design Completion for Low Level Main Sewage Pumps	September 2011
2. Notice to Proceed to Construction for Low Level Main Sewage Pumps	September 2012
3. Construction Completion for Low Level Main Sewage Pumps	April 2015
4. Initiate Design for 26th Ward Wet Weather Stabilization	December 2011

REVISED APPENDIX A
 DEC Case No. CO2-20140314-01

5. Design Completion for 26th Ward Wet Weather Stabilization	April 2013	REPLACED
6. Notice to Proceed to Construction for PST#5 and High Level Main Sewage Pumps	April 2014	REPLACED
7. Construction Completion for PST#5 and High Level Main Sewage Pumps	December 29, 2017	REPLACED
8. Notice to Proceed to Construction for 26th Ward Stabilization of PSTs #1 to 4	December 29, 2017	REPLACED
9. Construction Completion for 26th Ward Stabilization of PSTs #1 to 4	July 19, 2019*/July 19, 2020	REPLACED
5. Design Completion for 26th Ward Preliminary Treatment Reliability Improvements		December 2014 (Submitted by DEP on December 30, 2014)
6. Notice to Proceed to Construction for High Level Main Sewage Pumps		June 2015
7. Construction Completion for High Level Main Sewage Pumps		July 2018
8. Notice to Proceed to Construction for 26th Ward Preliminary Treatment Reliability Improvements to PSTs #1 to 4 and Construction of PST #5		January 2016
9. Construction Completion for 26th Ward Preliminary Treatment Reliability Improvements to PSTs #1 to 4 and Construction of PST #5		July 19, 2020
10. Update WWOP to Capture Improved Monitoring of 26th Ward WPCP Wet Weather Performance	6 months after construction completion of low level main sewage pumps	
L. Drainage Basin Specific Long Term Control Plans		
1. Submit Approvable Drainage Basin Specific LTCP for Jamaica Bay/Tribs	June 2016	
2. Submit Approvable Drainage Basin Specific LTCP for Spring Creek	Combined with XII.L.1	
3. Submit Approvable Drainage Basin Specific LTCP for Fresh Creek	Combined with XII.L.1	
4. Submit Approvable Drainage Basin Specific LTCP for Hendrix Creek	Combined with XII.L.1	

REVISED APPENDIX A
DEC Case No. CO2-20140314-01

XV. Wards Island WWTP Headworks Wet Weather Improvements	Milestone Date	Revised/Added Milestone Date
<p>A. Reconstruction of Main Sewage Pumps (MSP)</p> <ol style="list-style-type: none"> 1. Notice to Proceed to Construction for MSP replacement at Wards Island WWTP 2. Construction Completion for MSP replacement at Wards Island WWTP 		<p>March 2015 June 2017</p>
<p>B. Bar Screen Replacement</p> <ol style="list-style-type: none"> 1. Submit Basis of Design Report for Bar Screen Replacement at Manhattan and Bronx River Grit Chambers 2. Notice to Proceed to Construction for Bar Screen Replacement at Manhattan and Bronx River Grit Chambers 3. Construction Completion for Bar Screen Replacement at Manhattan and Bronx River Grit Chambers 		<p>April 2014 (complete) December 2014 (complete) June 2018</p>
<p>C. Wards Island WWTP Wet Weather Operating Plan</p> <ol style="list-style-type: none"> 1. Submit revised WWOP with priority for operating Bronx and Manhattan Grit Chambers 		<p>September 2014 (complete)</p>