TO: Town of Lewisboro Planning Board

FROM: Lewisboro Conservation Advisory Council

SUBJECT: Oakridge Commons,
450 Oakridge Common
South Salem, NY 10290
Sheet 49D, Block 9829, Lot 10

DATE: March 7, 2019

The Conservation Advisory Council (CAC) reviewed the applicant's submission document of the Pure Water filtration system which is understood to be the filtration system for the car wash water output.

The CAC continues to have concerns with two aspects of the Oakridge Commons car wash. The first concern is with information about the car wash filtration system. It is clear from the PureWater documentation provided, that the system is primarily designed to provide recycled clean water to the car wash and not for the quality of the water discharged to the Oakridge septic system and watershed.

The Oakridge Commons Car Wash Wastewater Review by Delaware Engineering places a significant weight on the documents provided by Oakridge Commons and its vendor PureWater. Given that there is no actual measurement of the effluent available, the CAC would like to have a well-defined inspection plan that includes inspections at regular intervals and measurement that meet EPA Standard Methods and by ELAP certified laboratory. The first such measurements should be done as early as possible to confirm the data provided. The CAC would like to see this included as a condition, should approval be granted by the Planning Board.

Despite the Delaware review the CAC continues to have the concerns stated below.

"*The primary purpose of the reclaim system is to provide quality water to the wash so that the water can be re-used within the wash…"*

"The reclaim system is not designed to meet a specific effluent…"

"TSS, FOG, and BOD are typically the main concerns of municipalities receiving the effluent from a car wash. Given the type of processes used by PureWater Reclaim System, ***there is no effect on total dissolved solids (TDS), pH or temperature. There may be little or no effect on certain chemicals dissolved in the water, emulsified or dissolved oils and non-settleable solids".***

"*The discharge is sent to a separate, customer supplied wastewater treatment device, or directly to sewer or leach field. The PureWater Reclaim System does not treat or affect minerals or chemicals dissolved in the water, emulsified or dissolved oils, non-settleable solids, the BOD/COD content, ph, or temperature of the water that is discharged."*

"The estimated discharge quality from the PureWater Reclaim System may or may not be acceptable for direct discharge to sewer or a leach field"

(TSS = Total Suspended Solids, FOG = Fat, Oil and Grease and BOD = Biochemical Oxygen Demand which is an indicator of Organic content. Missing altogether is COD which is Chemical Oxygen Demand)

The CAC presumes that the Oakridge sewer/septic system was designed for typical household effluents and not for chemicals (**unknown at this time**), wax, grease, oil and other substances used in a car wash. Therefore, the CAC is concerned that effluent coming from the car wash could pose a risk to the water system and watershed at Oakridge. **The CAC would like to have the Town of Lewisboro and its consultant for the Oakridge water and septic system determine whether that system was designed for these kinds of effluents and if the system can adequately remove them without damage to the water and the septic system itself**.

Second, the CAC has concerns about the outflow capacity calculations. The following excerpt from the January CAC minutes summarizes the CAC's concern: "*The document titled " Site Engineering Report" prepared by Redniss & Mead, Inc only addresses the waste water management for the addition of the day care center and does not address the impact of adding a car wash. Even so, this report indicates that with the addition of the day care center, the waste water system would be in the 80% + range of capacity using average daily out flow. If the calculation used maximum average out flow for the calculation, the waste water system would be over 90% of capacity, again without the addition of the car wash. The CAC would like the site engineering to include the impact of the car wash and use maximum average sewage out flow and the water demand."*