

Standard Department Narrative Form

Department Name/#: **Water Pollution Control Facility (WPCF)/661-440**

Purpose of Department/Mission

The treatment of combined sanitary, industrial, commercial and storm drain runoff (10% of sewer system is combined sanitary and storm) at the Water Pollution Control Facility (WPCF). Operation and maintenance of 8 pump stations, 4 residential grinder pump systems, two canal crossing heaters, the Millers Falls Flume, 3 combined sewer overflow (CSO) regulators, 2 CSO outfalls and one underground CSO flow buffer storage line. Maintenance and operation of the WPCF facility part of which is 46 years old and the remainder is 26 years old.

Department Staffing

- One full-time appointed WPCF Superintendent MA Grade 7
- One full-time Lead Operator MA Grade 7
- One full-time Plant Operator MA Grade 6
- One full-time Mechanic MA Grade 3 Municipal
- One full-time Truck Driver/Laborer
- One full-time Department Secretary (35 hours per week)
- One part-time Custodian (25 hours per week)

As required by law the facility is operated by staff licensed by the State of Massachusetts. The WPCF is rated as a Grade V facility with a weekend grade of 4M. Previous to June of 1998 the WWTP was rated as a grade 6 facility. As a result of the CSO project the facility rating may increase back to a full time grade 6 rating. Should a new biosolids dewatering system operation be provided the rating clearly would return to a 6.

The state of Massachusetts determines the staffing levels for all WPCF's. The facility operations manual developed in the early 1980's recommended 6.8 positions. In FY95 staffing (7 full time & 2 part time) was reduced thru attrition by 2 full time positions (24%), the Assistant Superintendent and a Truck Driver/Laborer. There has been no increase in staffing since then. A following review by the Department of Environmental Protection, December 1995, resulted in a staffing level requirement of 7 personnel representing a total of 14,560 labor hours per year; this does not included additional clerical responsibilities. At the current time, again based on a work year of 2,080 hours, there are 6.5 positions in place that is inclusive of clerical responsibilities. When the impact of holiday (676 hrs.), vacation (720 hrs.) and personal time (156 hrs.) are considered (total = 1,552 hrs. or .75 work year) available staff time becomes an equivalent 6.3 full time positions not including the impact of the use of sick leave. In summary the current staffing level is below that of the state estimated figure.

The WPCF is ageing and over time requires more maintenance; there are more pump stations than existed when the WPCF Operations Manual was written and more regulatory requirements. The Code of Massachusetts Regulations section 314 Division of Water Pollution Control, section 12.04 Maintenance of Treatment Works part 4 states "Any person

operating a sewer system shall cause the daily inspection of all pumping, ejector or lift stations on intercepting, trunk or main line sewers”. The WPCF is not staffed to inspect stations more than 3 times per week. The DEP is aware of this and has not enforced the CMR at this time. Should station failures occur that result in the discharge of raw sewage to surface waters or cause exposure to the general public, a fine could be levied and the CMR would then in all likelihood be enforced. This would result in the Town having to hire at least one more full time staff at the WPCF.

Mandated Services

33 USC sections 1251 et seq. 1977

- The Federal Clean Water Act as Amended instituted the authority for the Federal Government to require the treatment of sanitary sewage discharges into the receiving waters of the United States. *Adherence to requirements as outlined in the Town National Pollution and Discharge Elimination System (NPDES) Permit.*

42 USC section 6901 et seq. 1976

- The Solid Waste Disposal Act as amended by the Resource Conservation & Recovery Act. Reporting requirements for the presence of hazardous materials associated with the treatment of waste water. *Tracking, recording and annually reporting the use of chlorine at the WPCF.*

MGL Ch. 21, sections 26-53

- The Massachusetts Clean Water Act, as amended, instituted the authority for the State Government to require the treatment of sanitary sewage discharges into the receiving waters of the State of Massachusetts. *Adherence to requirements as outline in the Town National Pollution and Discharge Elimination System (NPDES) Permit.*

MGL Ch. 58, section 8

- Sewer abatements. *Process followed when handling sewer abatements where “extraordinary or clearly mitigating circumstances are demonstrated” justifying the taxpayer’s failure to have utilized the standard abatement process of MGL Ch. 59, S. 59.*

MGL Ch. 59, section59

- Sewer abatements. *Standard abatement process when abatement is requested within 30 days of the billing date.*

MGL Ch. 83, Municipal Finance Law Sewers, Drains & Sidewalks.

- Delineation of the laws affecting construction, maintenance, separation, purification & disposal of sewage, regulations, penalties and sewer assessments.

314 CMR

- 2.00 Permit Procedures – procedures for processing applications for all permits issued by the Department of Environmental Protection. *In our case the renewal of the Town National Pollution Discharge & Elimination System Permit presently done every 5 years. Presently a renewal application is under review.*
- 7.00 Permit Extension & Connection permit Program – *Regulation under which the Town accepts and processes requests for sanitary sewer extensions & connections.*
- 12.00 Operations & Maintenance & pretreatment Standards for Wastewater Treatment Works & Indirect Discharges. *Directs the Town to perform “proper*

operation and maintenance of wastewater treatment facilities and sewer systems...” to include the following.

- .03 – Operation of Treatment Works.
- .04 – Maintenance of Treatment Works.
- .05 - Safety Program.
- .06 – Sampling & Analysis.
- .07 – Record Keeping & Reporting.
- .08 – Prohibitions & Standards for Discharge of POTW’s.
- .09 – POTW Pretreatment Programs.

Compliance Reporting Schedule

Regulation	Description	Frequency	Report Date
NPDES Permit	CSO – Annual Report	Once Per Year	by January 15 th
NPDES Part 2, D.1.E.	CSO Dry weather overflow	Per Occurrence	Within 24 Hours oral then written
314 CMR 12.04:3	Staffing Plan	Every 2 Years	January 31
314 CMR 12.04:4	Pump Stations	Once Per Year	January 31
314 CMR 12.05:12	Alarm Systems	Twice Per Year	31 January & July
314 CMR 12.04:6	Generators	Once Per Year	January 31
314 CMR 3.10:11: k	New Sewer Connections	Once Per Year	January 31
40 CFR Part 503	Sludge Inventory & TCLP	Once Per Year	February 19
NPDES Permit	I/I Report	Once per Year	February 28
NPDES Permit	Pretreatment Report	Once per Year	March 1
NPDES Permit	Local Limits		?2007
NPDES Permit	Chlorine System Report	Once per year	November 30
314 CMR 12.05:5	Death or Injury	per Event	Within 24 Hours oral then written
14 CMR 12.03:8	Emergency Conditions	Per Event	Within 24 Hours oral then written
314 CMR 12.07:3	Pump Station Failure	Per Event	Within 24 Hours oral then written
40 CFR	NPDES Permit Renewal	Determined by Permit 5 year term	180 Days Prior to expiration
40 CFR	Non-compliance	Per Event	Within 24 Hours oral, written in 5 days
40 CFR	Change in Sludge Disposal	As Needed	Prior Notice
40 CFR	Toxicity & Chem.	Determined by Permit	2 ND week in June, 2 nd week in Sept.
NPDES MA 0100137	Discharge Monitoring Report	Monthly	15 th of month

Other Programs/Services Provided

Provide sewer billing information, flows, to the Treasurer Collector for sewer billing. Quarterly water meter readings of selected businesses most of which also have lawn watering meters.

Facility tours provided upon request.

Provide monthly report review documentation to Southworth Company.

Combined Sewer Overflow (CSO) project:

- Presently coordinating with the Highway Department.
- Application for funding to RDA & DEP.

Answer sewer connection and flow related questions from public.

Revenues Generated

- Residential Sewer User Fees.
- Commercial Sewer User Fees including surcharges for sewage of greater strength than domestic sewage.
- Septage Fees.
- Sewer Permits.
- Massachusetts Water Pollution Abatement Trust subsidies for certain debt.
- Transfers from general fund taxation to offset cost associated with treating inflow and infiltration.

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