

Douglas Lapp

From: Douglas Lapp
Sent: Tuesday, September 6, 2022 2:55 PM
To: Charles Heshion; Sherri Vallie; Daniel Duross
Cc: Chuck Heshion [REDACTED]; Dan Duross [REDACTED]
Subject: EPA Order Deadlines

Importance: High

Dear Sewer Commissioners:

I have been asked by the Chairman of the Board of Selectmen to reach out to you to confirm your responsibilities regarding the [EPA's Administrative Order](#). As you are aware, the Town met the first two deadlines when Town Counsel submitted the required material that was due on August 1, 2022 and September 1, 2022. This note serves as a reminder that the next deadline is November 30, 2022, as follows:

"Until further notice, beginning November 30, 2022, and every six months thereafter (i.e. each November 30, and May 31 each year), the Town shall submit a Semi-Annual Compliance Report to EPA and MassDEP detailing the actions taken by the Town during the prior six month period and planned during the next six month period to comply with this Order and to address NPDES permit flow violations and any other permit violations that occur associated with elevated flows to the treatment plant. The Semi-Annual Compliance Report shall, at a minimum, include the following:

- a. A summary listing of all monthly flow violations that occurred during the previous six months, including a statement regarding whether wastewater receiving less than secondary treatment was combined with the final effluent during any bypass events.
- b. The date of any bypasses of secondary treatment and the quantity of effluent discharged that received less than full secondary treatment.
- c. A detailed description of the actions taken during the previous six months calendar year to address requirements of this Order.
- d. A map or maps of the Collection System along with an overlay showing the location of projects to repair or replace infrastructure causing or contributing to effluent flow violations.
- e. The result of efforts to address 1/1 issues in the Collection System, including a table identifying and quantifying each source of 1/1 removed by those actions and the costs of removing the sources, individually and collectively.
- f. A description of the actions taken by the Town to comply with the sewer connection moratorium described in paragraph 13, above.
- g. A table showing any development projects before the Rockland Sewer Commission that have been approved but are waiting for authorization to connect to the Collection System including the revenue paid to the Town for the connection, gallons per day to be connected to the Collection System and the volume of 1/1 that must be removed associated with the project.
- h. A table showing any development projects before the Rockland Sewer Commission pending approval to connect to the Collection System including the estimate revenue paid to the Town for the connection, gallons per day to be connected to the Collection System and the volume of 1/1 that must be removed associated with the project.
- i. A spreadsheet showing the specific balance of money available to the Town to use towards 1/1 projects based on revenue generated from approval of any development projects.
- j. A description of actions taken towards implementation of the Additional Alternatives Report, such as contacts with other municipalities regarding the opportunities for diversion of all or partial flows from the Collection System to another municipal collection system, including regionalization, and a description of any

actions taken towards evaluation of moving the discharge point of the wastewater treatment plant to an alternative receiving waterbody.

- k. The actions that will be taken during next reporting period to address requirements of this Order.
- l. A description of revisions to any of the Town's plans to address 1/1 in response to any new information obtained during the previous six months."

As a reminder, **all** communication with the EPA regarding this Administrative Order should go through Town Counsel. If you have any questions about the materials required to be submitted please reach out to Town Counsel John Clifford directly at [REDACTED] or [REDACTED].

Please submit the Sewer Department's final response for the November 30, 2022 deadline to John Clifford no later than November 16, 2022 so that he will have time to review this information to ensure compliance with the Administrative Order and request any modifications or corrections to be made by the Sewer Department (if necessary).

Please do not hesitate to let me know if you have any questions, however, please do not reply-all or deliberate via email outside of a publicly posted meeting regarding this matter.

Thank you,

Douglas Lapp
Town Administrator
Town of Rockland, MA
Phone: (781) 616-6807
Email: dlapp@rockland-ma.gov



Cc: Board of Selectmen 'Read File'
Assistant Town Administrator
Robyn Day, Sewer Dept. Administrative Assistant
Town Counsel