



Town of Rockland

Sewer Commission

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Charles Heshion, *Chairman*
Daniel Duross, *Commissioner*
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September 19, 2023

Mr. David Turin, Environmental Scientist
U.S. EPA – Region 1, Water Compliance Section 2, Enforcement and Compliance Assurance Division
5 Post Office Square ~ Suite 100
Boston, MA 02109-3912

SUBJECT: Rockland, MA WWTP Comprehensive Wastewater Management Plan Commitment Letter

Dear David,

The Town of Rockland, Massachusetts and the Board of Sewer Commissioners are submitting this commitment letter to comply with Order for Compliance (Docket No. CWA-AO-R01-FY22-05) finding Number 23 that states “the Town shall develop and submit a plan and schedule to EPA and MassDEP describing what measures from the 2023 CWMP it plans on implementing.”

The CWMP, Phase 3, Section 7, includes a Recommended Wastewater Management Plan. The categories for this plan include unsewered high needs area 1, collection system I/I investigation and removal, collection system repair and replacement, pump station improvements, and WWTP improvements. The specific recommendations are summarized below:

- **Unsewered High Needs Area 1**
 - Continue with on-site septic systems until development occurs and collection system capacity exists such that the existing collection system can be extended to any developed properties.
- **Collection System**
 - I/I Control
 - Follow the submitted 2022 I&I Control Plan
 - 2023 Flow Metering source investigation
 - 2024 I&I remediation & repairs identified in Metering areas 6 & 11
 - 2023 through 2028 continue Lining and Repairs as revenue allows
 - 2024 through 2026 manhole and CCTV inspections
 - 2027 Smoke testing, dye testing, building inspections
 - 2029 through 2031 manhole and CCTV inspections
 - 2031 Smoke and Dye testing, building inspections
 - 2033 Rehab of Sewer System
 - 2034 through 2036 manhole and CCTV inspections
 - 2036 smoke and dye testing, building inspections

- **Pump Stations.**
 - Upgrade the Spruce Street Injector pump station 2024
 - Upgrade one Pump Station per year, specific stations T.B.D. 2025 through 2036
- **WWTP**
 - Design-Build Contracts 1, 2, 3, and 4
 - Contract 1 to begin design in 2023, construction in 2025
 - Contract 2, 3, and 4 to design to 60% to begin in 2024, construction dates to be determined

The Town is currently in process with a number of projects and intends to move forward with other projects as listed above, with the exception of major pump station upgrades. The Sewer Commission is prepared to fund pump station upgrades at approximately \$80,000 yearly, revenue permitting. With the WWTP upgrades and criticality of I/I reduction in the collection system, the pump stations are currently a lower priority for proactive upgrades. Should a pump station fail, the Town will repair and/or replace equipment as needed. Major upgrades will be delayed until funding allows.

As required in the Order, specifically 19. e. & f., the Town and the Rockland Board of Sewer Commissioners will continue to strictly enforce the conditions contained in their approved July 1, 2021 Moratorium. The Moratorium was developed with the intention to control development, comply with the flow discharge reduction requirements and establish a record of compliance history as contained in the Order.

The Sewer Commission is currently in the process of amending the 2021 Moratorium to allow a source of revenue to fund our commitments to the Administrative Order of 2022. The MassDEP and EPA will be notified of any Sewer Commission approved modifications to the Moratorium.

The Town, Veolia, and Wright-Pierce are willing to discuss with EPA and DEP, as necessary. Thank you for your consideration on this matter.

Sincerely,
Rockland Board of Sewer Commissioners


Charles Heshion, Chairman
Email: cheshion@rockland-ma.gov


Sherri Vallie, Commissioner


Dan DuRoss, Commissioner

cc: Mr. Richard Kotouch Veolia Project Manager
Ms. Megan Lynch, Veolia Asst. Project Manager
Mr. David Burns, MassDEP
Mr. Douglas Lapp, Town Administrator
Mr. Kevin Olson, PE, Wright-Pierce
Mr. Adam Higgins, PE, Wright-Pierce
Mr. John Ayotte, Veolia North America
Rockland Sewer Department