

**AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Clean Water Act as amended (33 U.S.C. §§1251 et seq.; the “CWA”), and the Massachusetts Clean Waters Act, as amended (M.G.L. Chap. 21, §§26-53),

**Town of South Hadley
Board of Selectmen**

is authorized to discharge from a facility located at

**South Hadley Wastewater Treatment Plant
and Combined Sewer Overflows “CSOs”
2 James Street
Chicopee, MA 01020**

to a receiving waters named

Connecticut River, Buttery Brook, and Stony Brook (MA 34)

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective sixty days from date of signature on June 3, 2002.

This permit and the authorization to discharge expire at midnight, September 30, 2005.

This permit supersedes the permit issued on October 10, 1995.

This permit consists of 17 pages in Part I, including effluent limitations, monitoring requirements; Attachments A, Acute Toxicity Test Protocol & Procedures; Attachments B and C; Sludge Guidance; and 35 pages in Part II, including General Conditions and Definitions.

Signed this 3rd day of April, 2002

Signature on File

Linda M. Murphy, Director
Office of Ecosystem Protection
Environmental Protection Agency
Boston, MA

Glenn Haas, Director
Division of Watershed Management
Bureau of Resource Protection
Department of Environmental Protection
Commonwealth of Massachusetts
Boston, MA

PART I**A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

1. During the period beginning the effective date and lasting through expiration, the permittee is authorized to discharge treated effluent from outfall number 001 to the Connecticut River. Such discharge shall be limited and monitored by the permittee as specified below:

<u>Effluent Characteristic</u>	<u>Units</u>	<u>Discharge Limitation</u>			<u>Monitoring Requirements¹</u>	
		<u>Average Monthly</u>	<u>Average Weekly</u>	<u>Maximum Daily</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Flow	MGD	4.2 ^{2,3}	---	Report	Continuous	Recorder
BOD ₅ ⁴	mg/l	30	45	Report	2/Week	24-Hour
	lbs/day	1051	1576			Composite ⁵
TSS ⁴	mg/l	30	45	Report	2/Week	24-Hour
	lbs/day	1051	1576			Composite ⁵
pH	S.U.	(See condition I.A.1.b on page 5)			1/Day	Grab
Fecal Coliform ⁶	cfu/100 ml	200	---	400	1/Week	Grab
Total Residual Chlorine ⁶	mg/l	1.0	—	1.0	1/Day	Grab
Total Kjeldahl Nitrogen	mg/l	Report	—	Report	1/Month	24-Hour Composite ⁵
Nitrite Plus Nitrate Nitrogen	mg/l	Report	—	Report	1/Month	24-Hour Composite ⁵
Phosphorus, Total	mg/l	Report	—	Report	1/Quarter	24-Hour Composite ⁵

<u>Effluent Characteristic</u>	<u>Units</u>	<u>Discharge Limitation</u>			<u>Monitoring Requirements¹</u>	
		<u>Average Monthly</u>	<u>Average Weekly</u>	<u>Maximum Daily</u>	<u>Measurement Frequency</u>	<u>Sample Type</u>
Whole Effluent Toxicity ^{7, 8, 9}	%	---	—	LC ₅₀ ≥ 50	2/year	24-Hour Composite ⁵

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Footnotes:

- 1) All required effluent samples shall be collected prior to chlorination except for the chlorine residual and fecal coliform samples, which shall be taken after disinfection. Any change in sampling location must be reviewed and approved in writing by EPA and MADEP. All samples shall be tested using analytical methods found in 40 CFR 136, or alternative methods approved by EPA in accordance with procedures in 40 CFR 136. All samples shall be 24-hour composites unless specified as a grab sample in 40 CFR 136.
- 2) Required for State Certification.
- 3) For flow, report maximum and minimum daily rates and total flow for each operating date. This is an annual average limit, which shall be reported as a rolling average. The first value will be calculated using the monthly average flow for the first full month ending after the effective date of the permit and the eleven previous monthly average flows. Each subsequent month's DMR report will report the annual average flow that is calculated from that month and the previous 11 months.
- 4) Sampling required for influent and effluent.
- 5) A 24-hour composite will consist of at least twenty-four (24) grab samples taken during one working day (e.g., 0700 Monday to 0700 Tuesday).
- 6) Fecal coliform and total residual chlorine monitoring will be conducted only from April 1 to October 31, to reflect the seasonal chlorination period. This is a state certification requirement. The average monthly limit is expressed as a geometric mean. Samples for total residual chlorine and fecal coliform shall be taken at the same time.

- 7) The permittee shall conduct acute toxicity tests two times per year. The permittee shall test the daphnid, Ceriodaphnia dubia. Toxicity test samples shall be collected during the second week of June and September. Results are to be submitted by the 30th day of the month after the sample, i.e. July and October. See Permit **Attachment A** Toxicity Test Procedure and Protocol.
- 8) The LC₅₀ is the concentration of effluent which causes mortality to 50% of the test organisms. Therefore, a 50% limit means that a sample of 50% effluent shall cause no more than a 50% mortality rate.
- 9) If toxicity test(s) using receiving water as diluent show the receiving water to be toxic or unreliable, the permittee shall follow procedures outlined in **Attachment A, Section IV., DILUTION WATER** in order to obtain permission to use an alternate dilution water.

In lieu of individual approvals for alternate dilution water required in **Attachment A**, EPA-New England has developed a Self-Implementing Alternative Dilution Water Guidance document (called “Guidance Document”) which may be used to obtain automatic approval of an alternate dilution water, including the appropriate species for use with that water. If this Guidance document is revoked, the permittee shall revert to obtaining approval as outlined in **Attachment A**. The “Guidance Document” has been sent to all permittees with their annual set of DMRs and Revised Updated Instructions for Completing EPA’s Pre-Printed NPDES Discharge Monitoring Report (DMR) Form 3320-1 and is not intended as a direct attachment to this permit. Any modification or revocation to this “Guidance Document” will be transmitted to the permittees as part of the annual DMR instruction package. However, at any time, the permittee may choose to contact EPA-New England directly using the approach outlined in **Attachment A**.

PART I.A.1 (continued)

- a. The discharge shall not cause a violation of the water quality standards of the receiving waters.
- a. The pH of the effluent shall not be less than 6.0 S.U., nor greater than 8.3 S.U. at any time, unless these values are exceeded due to natural causes or as a results of an approved treatment process.
- c. The discharge shall not cause objectionable discoloration of the receiving water.
- d. The effluent shall contain neither a visible oil sheen, foam, nor floating solids at any time.
- e. The permittee’s treatment facility shall maintain a minimum of 85 percent removal of both total suspended solids and biochemical oxygen demand. The percent removal shall be based on monthly average values.

- f. When the effluent discharges for a period of 90 consecutive days exceeds 80 percent of design flow, the permittee shall submit to the permitting authorities a projection of loadings up to the time when the design capacity of the treatment facility will be reached, and a program for maintaining satisfactory treatment levels consistent with approved water quality management plans.
- g. The permittee shall minimize the use of chlorine while maintaining adequate bacterial control.
- h. The results of sampling for any parameter above its required frequency must also be reported.

2. All POTWs must provide adequate notice to the Director of the following:

- a. Any new introduction of pollutants into that POTW from an indirect discharger in a primary industry category discharging process water; and/or
- b. Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
- c. For the purposes of this paragraph, adequate notice shall be include information on:
 - (1) The quantity and quality of effluent introduced into the POTW; and
 - (2) Any anticipated impact of the change in the quantity or quality of effluent to be discharged from the POTW.

3. Prohibitions Concerning Interference and Pass Through:

- a. Pollutants introduced into POTWs by a non-domestic source shall not pass through the POTW or interfere with the operation or performance of the works.
- b. If, within 30 days after notice of an interference or pass through violation has been sent by EPA to the POTW, and to persons or groups who have requested such notice, the POTW fails to commence appropriate enforcement action to correct the violation, EPA may take appropriate enforcement action.

4. Toxics Control:

- a. The permittee shall not discharge any pollutant or combinations of pollutants in toxic amounts.
- b. Any toxic components of the effluent shall not result in any demonstrable harm to aquatic life or violate any state or federal water quality standard which has been or may be promulgated. Upon promulgation of any such standard, this permit may be revised or amended in accordance with such standards.

5. Numerical Effluent Limitations for Toxicants:

EPA or DEP may use the results of toxicity tests and chemical analyses conducted pursuant to this permit, as well as national water quality criteria developed pursuant to Section 304(a)(1) of the Clean Water Act (CWA), state water quality criteria, and any other appropriate information or data, to develop numerical effluent limitations for any pollutants, including but not limited to those pollutants listed in Appendix D of 40 CFR Part 122.

B. INDUSTRIAL PRETREATMENT PROGRAM

1. Limitations for Industrial Users

The permittee shall develop and enforce specific effluent limits (local limits) for Industrial User(s), and all other users, as appropriate, which together with appropriate changes in the POTW Treatment Plant's Facilities or operation, are necessary to ensure continued compliance with the POTW's NPDES permit or sludge use or disposal practices. Specific local limits shall not be developed and enforced without individual notice to persons or groups who have requested such notice and an opportunity to respond. Within **120 days of the effective date of this permit**, the permittee shall prepare and submit a written technical evaluation to the EPA analyzing whether or not there is a need to revise the local limits. As part of this evaluation, the permittee shall assess how the POTW performs with respect to influent and effluent of pollutants, water quality concerns, sludge quality, sludge processing concerns/inhibition, biomonitoring results, activated sludge inhibition, worker health and safety and collection system concerns. In preparing this evaluation, the permittee shall complete and submit the attached form **(Attachment B)** with the technical evaluation to assist in determining whether existing local limits need to be revised. Justifications and conclusions should be based on actual plant data if available and should be included in the report. Should the evaluation reveal the need to revise local limits, the permittee shall complete the revisions within 120 days of notification by EPA and submit the revisions to EPA for approval. The Permittee shall carry out the local limits revisions in accordance with EPA Guidance Manual for the Development and Implementation of Local Discharge Limitations Under the Pretreatment Program (December, 1987).

2. Industrial Pretreatment Program

The permittee shall implement the Industrial Pretreatment Program in accordance with the legal authorities, policies, procedures, and financial provisions described in the permittee's approved Pretreatment Program, and the General Pretreatment Regulations, 40 CFR 403. At a minimum, the permittee must perform the following duties to properly implement the Industrial Pretreatment Program (IPP):

- a. Carry out inspection, surveillance, and monitoring procedures which will determine, independent of information supplied by the industrial user, whether the industrial user is in compliance with the Pretreatment Standards. At a minimum, all significant industrial users shall be sampled and inspected at the frequency established in the approved IPP but in no case less than once per year and maintain adequate records.
 - b. Issue or renew all necessary industrial user control mechanisms within 90 days of their expiration date or within 180 days after the industry has been determined to be a significant industrial user.
 - c. Obtain appropriate remedies for noncompliance by any industrial user with any pretreatment standard and/or requirement.
 - d. Maintain an adequate revenue structure for continued implementation of the Pretreatment Program.
3. The permittee shall provide the EPA and MA DEP with an annual report describing the permittee's pretreatment program activities for the twelve month period ending 60 days prior to the due date in accordance with 40 CFR 403.12(i). The annual report shall be consistent with the format described in **Attachment C** of this permit and shall be submitted no later than **March 1 of each year**.
4. The permittee must obtain approval from EPA prior to making any significant changes to the industrial pretreatment program in accordance with 40 CFR 403.18(c).
5. The permittee must assure that applicable National Categorical Pretreatment Standards are met by all categorical industrial users of the POTW. These standards are published in the Federal Regulations at 40 CFR 405 et. seq.
6. The permittee must modify its pretreatment program, **if applicable**, to conform to all changes in the Federal Regulations that pertain to the implementation and enforcement of the industrial pretreatment program. The permittee must provide EPA, in writing, within **180 days of this permit's effective date** proposed changes, **if applicable**, to the permittee's pretreatment program deemed necessary to assure conformity with current Federal Regulations. At a minimum, the permittee must address in its written submission the following areas: (1) proposed changes to the enforcement response plan and (2) recent revisions to the sewer use ordinances. The permittee will implement these

proposed changes pending EPA Region I's approval under 40 CFR 403.18. This submission is separate and distinct from any local limits analysis submission described in Part I.B.1.

C. COMBINED SEWER OVERFLOWS (CSO)

1. During wet weather, the permittee is authorized to discharge storm water/wastewater from the combined sewer outfalls listed below:

<u>Discharge Serial No.</u>	<u>CSO Location</u>	<u>Receiving Water</u>
004	Main Street, South Hadley Electric Department	Buttery Brook
010	Stony Brook Pump Station at Route 116	Stony Brook
012	Gaylord Street	Buttery Brook
014	Mount Holyoke College Interceptor	Stony Brook

Such discharges shall be subject to the following effluent limitations:

- a. The discharges shall receive treatment at a level providing Best Practicable Control Technology Currently Available (BPT), Best Conventional Pollutant Control Technology (BCT) to control and abate conventional pollutants and Best Available Technology Economically Achievable (BAT) to control and abate non-conventional and toxic pollutants. The EPA has made a Best Professional Judgement (BPJ) determination that BPT, BCT, and BAT for combined sewer overflows (CSOs) include the implementation of Nine Minimum Controls (NMC) specified below.
- (1) Proper operation and regular maintenance programs for the sewer system and the combined sewer overflows.
 - (2) Maximum use of the collection system for storage.
 - (3) Review and modification of the pretreatment program to assure CSO impacts are minimized.
 - (4) Maximization of flow to the POTW for treatment.

- (5) Prohibition of dry weather overflows from CSOs.
 - (6) Control of solid and floatable materials in CSOs.
 - (7) Pollution prevention programs that focus on contaminant reduction activities.
 - (8) Public notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts.
 - (9) Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.
- b. The discharges shall not cause or contribute to violations of Federal or State Water Quality Standards.

2. Nine Minimum Controls, Minimum Implementation Levels.

- a. The Permittee must implement the nine minimum controls in accordance with the documentation provided to EPA and MA DEP or as subsequently modified to enhance the effectiveness of the controls. This implementation must include the following controls plus other controls the Permittee can reasonably implement as set forth in the documentation.
- b. Each CSO structure/regulator, pumping station and/or tide gate shall be routinely inspected to insure that they are in good working condition and adjusted to minimize combined sewer discharges and tidal surcharging. Such inspections shall occur monthly unless EPA approves a site specific inspection program which has been determined by EPA to provide an equal level of effectiveness (NMC #1, 2, and 4). The following inspection results shall be recorded: the date and time of the inspection, the general condition of the facility, and whether the facility is operating satisfactorily. If maintenance is necessary, the permittee shall record: the description of the necessary maintenance, the date the necessary maintenance was performed, and whether the observed problem was corrected. The permittee shall maintain all records of inspections for at least three (3) years.
- c. Annually, no later than **January 15th**, the permittee shall submit a certification to the State and EPA which states that the previous calendar year's monthly inspections were conducted, results recorded, and records maintained.
- d. The State and EPA have the right to inspect any CSO related structure or outfall, without prior notification to the permittee.
- e. Discharges to the combined system of septage, holding tank wastes or other material which may cause a visible oil sheen or containing floatable material are prohibited during wet weather when CSO discharges may be active. (NMC# 3,6, and 7).
- f. Dry weather overflows (DWOs) are prohibited (NMC# 5). All dry weather sanitary and/or industrial discharges from CSOs must be reported to EPA and the State within twenty-four (24) hours in accordance with the reporting requirements for plant bypass (Paragraph D.1.e. of Part II of this permit).
- g. The permittee shall quantify and record all discharges from combined sewer outfalls (NMC# 9). Quantification may be through direct measurement or estimation. When estimating, the permittee shall make reasonable efforts (i.e., gaging, measurements) to verify the validity of the estimation technique. The following information must be recorded for each combined sewer outfall for each discharge event:

- (1) Estimated duration (hours) of discharge;
- (2) Estimated volume (gallons) of discharge; and
- (3) National Weather Service precipitation data from the nearest gage where precipitation is available at daily (twenty-four (24) hour) intervals and the nearest gage where precipitation is available at one-hour intervals.

The permittee shall maintain all records of discharges for at least six (6) years after the effective date of this permit.

Annually, no later than **January 15th**, the permittee shall submit a certification to the State and EPA which states that all discharges from combined sewer outfalls were recorded, and records maintained for the previous calendar year.

- h. The permittee shall install and maintain identification signs for all combined sewer outfall structures (NMC #8). The signs must be located at or near the combined sewer outfall structures and easily readable by the public. These signs shall be a minimum of twelve x eighteen (12 x 18) inches in size, with white lettering against a green background, and shall contain the following information:

TOWN OF SOUTH HADLEY
WET WEATHER
SEWAGE DISCHARGE
OUTFALL (discharge serial number)

D. UNAUTHORIZED DISCHARGES

The permittee is authorized to discharge only in accordance with the terms and conditions of this permit and only from the outfalls listed in Part I.A.1 and the four known Combined Sewer Overflows listed in **Part I.C.1** of this permit. Discharge of wastewater from any other point source is not authorized by this permit and shall be reported in accordance with Section D.1.e(1) of the General Requirements of this permit (Twenty-four hour reporting).

E. OPERATION AND MAINTENANCE OF THE SEWER SYSTEM

Operation and maintenance of the sewer system shall be in compliance with the General Requirements of Part II and the following terms and conditions:

- 1 Maintenance Staff

The permittee shall provide adequate staff to carry out the operations, maintenance, repair and testing functions required to ensure compliance with the terms and conditions of this permit.

2. Preventative Maintenance Program

The permittee shall maintain an ongoing preventative maintenance program to prevent overflows and bypasses caused by malfunctions or failures of the sewer system infrastructure. The program shall include an inspection program designed to identify all potential and actual unauthorized discharges.

3. Infiltration/Inflow Control Plan

The permittee shall develop and implement a plan to control infiltration and inflow (I/I) to the separate sewer system. The plan shall be submitted to EPA and MA DEP **within twelve months of the effective date of this permit** (see page 1 of this permit for the effective date) and shall describe the permittee's program for preventing infiltration/inflow related effluent limit violations, and all unauthorized discharges of wastewater, including overflows and by-passes due to excessive infiltration/inflow.

The plan shall include:

- An ongoing program to identify and remove sources of infiltration and inflow. The program shall include the necessary funding level and the source(s) of funding.
- An inflow identification and control program that focuses on the disconnection and redirection of illegal sump pumps and roof down spouts. Priority should be given to removal of public and private inflow sources that are upstream from, and potentially contribute to, known areas of sewer system backups and/or overflows.
- Identification and prioritization of areas that will provide increased aquifer recharge as the result of reduction/elimination of infiltration and inflow to the system.
- An educational public outreach program for all aspects of I/I control, particularly private inflow.
- The permittee shall require, through appropriate agreements, that all member communities develop and implement infiltration and inflow control plans sufficient to ensure that high flows do not cause or contribute to a violation of the permittee's effluent limitations, or cause overflows from the permittee's collection system.

Reporting Requirements:

A summary report of all actions taken to minimize I/I during the previous calendar year shall be submitted to EPA and the MA DEP **annually, by the anniversary date of the effective date of this permit.** The summary report shall, at a minimum, include:

- A map and a description of inspection and maintenance activities conducted and corrective actions taken during the previous year.
- Expenditures for any infiltration/inflow related maintenance activities and corrective actions taken during the previous year.
- A map with areas identified for I/I-related investigation/action in the coming year.
- A calculation of the annual average I/I, the maximum month I/I for the reporting year.
- A report of any infiltration/inflow related corrective actions taken as a result of unauthorized discharges reported pursuant to 314 CMR 3.19(20) and reported pursuant to the Unauthorized Discharges section of this permit.

4. Alternate Power Source

In order to maintain compliance with the terms and conditions of this permit, the permittee shall continue to provide an alternative power source with which to sufficiently operate its treatment works (as defined at 40 CFR §122.2).

5. Chlorination System Report

Within 12 months of the effective date of the permit, the permittee will submit a report documenting the effectiveness of the chlorination system. The report will specifically address how flow variability and chlorine demand variability affect compliance with the TRC and fecal coliform limits at all times. Sampling data shall be provided to support conclusions on how hourly and daily flow and chlorine demand variability affect permit compliance. The report will include a description of the chlorination system and methods of dosage control.

The report will identify all changes necessary to ensure compliance with the TRC and fecal coliform limits at all times, including equipment modifications and upgrades, operational procedures (including calibrations procedures and alarm/response procedures),

and sampling protocols. The report will include a schedule for implementing all of the necessary changes. An annual report shall be submitted on January 30 of each year summarizing all exceedances of the TRC and fecal coliform limits during the previous calendar year, the estimated or measured fecal coliform and chlorine discharge levels during the exceedance, and measures taken to fix the problem and to prevent future occurrences.

F. SLUDGE CONDITIONS

1. The permittee shall comply with all existing federal and state laws and regulations that apply to sewage sludge use and disposal practices and with the CWA Section 405(d) technical standards.
2. The permittee shall comply the more stringent of either state or federal regulations.
3. The technical standards (Part 503 regulations) apply to facilities which perform one or more of the following use or disposal practices:
 - a. Land application - the use of sewage sludge to condition or fertilize the soil;
 - b. Surface disposal - the placement of sewage sludge in a sludge-only landfill; or
 - c. Placement of sludge in a municipal solid waste landfill.
4. These conditions do not apply to facilities which transport sewage sludge to another facility for use or disposal or which do not use or dispose of sewage sludge (e.g., lagoons - reed beds); or material described in 40 CFR 503.6 (Exclusions).
5. The permittee shall use and comply with the attached guidance document to determine appropriate conditions. Appropriate conditions contain the following elements:
 - a. General requirements
 - b. Pollutant limitations
 - c. Operational standards (pathogen reduction requirement and vector attraction reduction requirements)
 - d. Management practices
 - e. Record keeping
 - f. Monitoring
 - g. Reporting

Depending upon the quality of material produced by a facility, all conditions may not apply to the facility.

6. The permittee shall monitor the pollutant concentrations, pathogen reduction and vector attraction reduction at the following frequency. This frequency is based upon the volume of sewage sludge generated at the facility in dry metric tons per year:

<u>Sludge Volume (dry metric tons/year)</u>	<u>Monitoring Frequency</u>
less than 290	1/year
290 to less than 1500	1/quarter
1500 to less than 15,000	6/year
15,000+	1/month

7. The permittee shall sample the sewage sludge using the procedures detailed in 40 CFR 503.8.
8. The permittee shall submit an annual report containing the information specified in the guidance. Reports are due annually by **February 19th**. Reports shall be submitted to the addresses contained in the reporting section of the permit. Sludge monitoring is not required by the permittee when the permittee is not responsible for the ultimate sludge disposal. The permittee must be assured that any third party contractor is in compliance with appropriate regulatory requirements. The permittee is required only to submit an annual report containing the following information:
- Name and address of contractor responsible for sludge disposal
 - Quantity of sludge in dry metric tons removed from the facility by the sludge contractor

G. MONITORING AND REPORTING

1. Reporting

Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report Forms(s) postmarked no later than the 15th day of the month following the effective date of the permit.

Signed and dated originals of these, and all other reports required herein, shall be submitted to the Director and the State at the following addresses:

Environmental Protection Agency
Water Technical Unit (SEW)
P.O. Box 8127
Boston, MA 02114

The State agency is:

Massachusetts Department of Environmental Protection
Western Regional Office
Bureau of Resource Protection
436 Dwight Street
Springfield, MA 01103

Signed and dated Discharge Monitoring Report forms, toxicity test reports, and all other reports required herein, shall also be submitted to the State at the following address:

Massachusetts Department of Environmental Protection
Division of Watershed Management
Surface Water Discharge Permit Program
627 Main Street, 2nd Floor
Worcester, MA 01608

NPDES Permit No. MA 0100455

H. STATE PERMIT CONDITIONS

1. This discharge permit is issued jointly by the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MA DEP) under federal and state law, respectively. As such, all the terms and conditions of this permit are hereby incorporated into and constitute a discharge permit issued by the MA DEP pursuant to M.G. L, Chap. 21, §43.
2. Each agency shall have the independent right to enforce the terms and conditions of this permit. Any modification, suspension, or revocation of this permit shall be effective only with respect to the agency taking such action, and shall not affect the validity or status of this permit as issued by the other agency, unless and until each agency has concurred in writing with such modification, suspension, or revocation. In the event any portion of this permit is declared invalid, illegal, or otherwise issued in violation of state law such permit shall remain in full force and effect under federal law as an NPDES permit issued by the U.S. Environmental Protection Agency. In the event this permit is declared invalid, illegal, or otherwise issued in violation of federal law, this permit shall remain in full force and effect under state law as a permit issued by the Commonwealth of Massachusetts.

NPDES Permit No. MA 0100455

Attachment B

Reassessment of Technically Based Industrial Discharge Limits

Under 40 CFR §122.21(j)(4), all Publicly Owned Treatment Works (POTWs) with approved Industrial Pretreatment Programs (IPPs) shall provide the following information to the Director: a written evaluation of the need to revise local industrial discharge limits under 40 CFR §403.5(c)(1).

Below is a form designed by the U.S. Environmental Protection Agency (EPA - New England) to assist POTWs with approved IPPs in evaluating whether their existing Technically Based Local Limits (TBLLs) need to be recalculated. The form allows the permittee and EPA to evaluate and compare pertinent information used in previous TBLLs calculations against present conditions at the POTW.

Please read direction below before filling out form.

ITEM I.

- * In Column (1), list what your POTW's influent flow rate was when your existing TBLLs were calculated. In Column (2), list your POTW's present influent flow rate. Your current flow rate should be calculated using the POTW's average daily flow rate from the previous 12 months.
- * In Column (1) list what your POTW's SIU flow rate was when your existing TBLLs were calculated. In Column (2), list your POTW's present SIU flow rate.
- * In Column (1), list what dilution ratio and/or 7Q10 value was used in your old/expired NPDES permit. In Column (2), list what dilution ration and/or 7Q10 value is presently being used in your new/reissued NPDES permit.

The 7Q10 value is the lowest seven day average flow rate, in the river, over a ten year period. The 7Q10 value and/or dilution ratio used by EPA in your new NPDES permit can be found in your NPDES permit "Fact Sheet."

- * In Column (1), list the safety factor, if any, that was used when your existing TBLLs

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were calculated.

- * In Column (1), note how your bio-solids were managed when your existing TBLLs were calculated. In Column (2), note how your POTW is presently disposing of its biosolids and how your POTW will be disposing of its biosolids in the future.

ITEM II.

- * List what your existing TBLLs are - as they appear in your current Sewer Use Ordinance (SUO).

ITEM III.

- * Identify how your existing TBLLs are allocated out to your industrial community. Some pollutants may be allocated differently than others, if so please explain.

ITEM IV.

- * Since your existing TBLLs were calculated, identify the following in detail:
 - (1) if your POTW has experienced any upsets, inhibition, interference or pass-through as a result of an industrial discharge.
 - (2) if your POTW is presently violating any of its current NPDES permit limitations - include toxicity.

ITEM V.

- * Using current sampling data, list in Column (1) the average and maximum amount of pollutants (in pounds per day) received in the POTW's influent. Current sampling data is defined as data obtained over the last 24 month period.

All influent data collected and analyzed must be in accordance with 40 CFR §136. Sampling data collected should be analyzed using the lowest possible detection

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method(s), e.g. graphite furnace.

- * Based on your existing TBLLs, as presented in Item II., list in Column (2), for each pollutant the Maximum Allowable Industrial Headwork Loading (MAIHL) values derived from an applicable environmental criteria or standard, e.g. water quality, sludge, NPDES, inhibition, etc. For each pollutant, the MAIHL equals the calculated Maximum Allowable Headwork Loading (MAHL) minus the POTW's domestic loading source(s). For more information, please see p.,3-28 in EPA's Guidance Manual on the Development and Implementation of Local Limits Under the Pretreatment Program, 12/87.

Item VI.

- * Using current sampling data, list in Column (1) the average and maximum amount of pollutants (in micrograms per liter) present your POTW's effluent. Current sampling data is defined as data obtained during the last 24 month period.

All effluent data collected and analyzed must be in accordance with 40 CFR §136. Sampling data collected should be analyzed using the lowest possible detection method(s), e.g. graphite furnace.

- * List in Column (2A) what the Water Quality Standards (WQS) were (in micrograms per liter) when your TBLLs were calculated, please note what hardness value was used at that time. Hardness should be expressed in milligram per liter of Calcium Carbonate.

List in Column (2B) the current WQSs or "Chronic Gold Book" values for each pollutant multiplied by the dilution ratio used in your new/reissued NPDES permit. For example, with a dilution ratio of 25:1 at a hardness of 25 mg/l - Calcium Carbonate (copper's chronic WQS equals 6.54 ug/l) the chronic NPDES permit limit for copper would equal 156.25 ug/l.

ITEM VII.

- * In Column (1), list all pollutants (in micrograms per liter) limited in your new/reissued NPDES permit. In Column (2), list all pollutants limited in your

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old/expired NPDES permit.

ITEM VIII.

- * Using current sampling data, list in Column (1) the average and maximum amount of pollutants in your POTW's biosolids. Current data is defined as data obtained during the last 24 month period. Results are to be expressed as total dry weight.

All biosolids data collected and analyzed must be in accordance with 40 CFR §136.

In Column (2A), list current State and/or Federal sludge standards that your facility's biosolids must comply with. Also note how your POTW currently manages the disposal of its biosolids. If your POTW is planing on managing its biosolids differently, list in Column (2B) what your new biosolids criteria will be and method of disposal.

In general, please be sure the units reported are correct and all pertinent information is included in your evaluation. If you have any questions, please contact your pretreatment representative at EPA - New England.

**REASSESSMENT OF TECHNICALLY BASED LOCAL LIMITS
(TBLLs)**

POTW Name & Address : _____

NPDES PERMIT # : _____

Date EPA approved current TBLLs : _____

Date EPA approved current Sewer Use Ordinance : _____

ITEM I.

In Column (1) list the conditions that existed when your current TBLs were calculated. In Column (2), list current conditions or expected conditions at your POTW.

Column (2)

PRESENT CONDITIONS

N/A

Biosolids Disposal
Method(s)

EXISTING TBLLs

NUMERICAL LIMIT
(mg/l) or (lb/day)

[illegible][illegible][illegible][illegible]

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ITEM III.

Note how your existing TBLLs, listed in Item II., are allocated to your Significant Industrial Users (SIUs), i.e. uniform concentration, contributory flow, mass proportioning, other. Please specify by circling.

ITEM IV.

Has your POTW experienced any upsets, inhibition, interference or pass-through from industrial sources since your existing TBLLs were calculated?

If yes, explain. _____

Has your POTW violated any of its NPDES permit limits and/or toxicity test requirements?

If yes, explain. _____

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ITEM V.

Using current POTW influent sampling data fill in Column (1). In Column (2), list your Maximum Allowable Industrial Headwork Loading (MAIHL) values used to derive your TBLLs listed in Item II. In addition, please note the Environmental Criteria for which each MAIHL value was established, i.e. water quality, sludge, NPDES etc.

Pollutant	Column (1)		Column (2)	
	Influent Data	Analyses	MAIHL Values	Criteria
	Maximum (lb/day)	Average (lb/day)	(lb/day)	
Arsenic	-----	-----	-----	-----
Cadmium	-----	-----	-----	-----
Chromium	-----	-----	-----	-----
Copper	-----	-----	-----	-----
Cyanide	-----	-----	-----	-----
Lead	-----	-----	-----	-----
Mercury	-----	-----	-----	-----
Nickel	-----	-----	-----	-----
Silver	-----	-----	-----	-----
Zinc	-----	-----	-----	-----
Other (List)				
-----	-----	-----	-----	-----
-----	-----	-----	-----	-----
-----	-----	-----	-----	-----

ITEM VI.

Using current POTW effluent sampling data, fill in Column (1). In Column (2A) list what the Water Quality Standards (Gold Book Criteria) were at the time your existing TBLLs were developed. List in Column (2B) current Gold Book values multiplied by the dilution ratio used in your new/reissued NPDES permit.

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Pollutant	Column (1)		Columns	
	Effluent Data Maximum	Analyses Average	(2A)	(2B)
			Water Quality Criteria	
			(Gold Book)	
			From TBLs	Today
	(ug/l)	(ug/l)	(ug/l)	(ug/l)
Arsenic	-----	-----	-----	-----
*Cadmium	-----	-----	-----	-----
*Chromium	-----	-----	-----	-----
*Copper	-----	-----	-----	-----
Cyanide	-----	-----	-----	-----
*Lead	-----	-----	-----	-----
Mercury	-----	-----	-----	-----
*Nickel	-----	-----	-----	-----
Silver	-----	-----	-----	-----
*Zinc	-----	-----	-----	-----
Other (List)				
-----	-----	-----	-----	-----
-----	-----	-----	-----	-----
-----	-----	-----	-----	-----
*Hardness Dependent (mg/l - CaCO3)			-----	-----

ITEM VII.

In Column (1), identify all pollutants limited in your new/reissued NPDES permit. In Column (2), identify all pollutants that were limited in your old/expired NPDES permit.

Column (1)		Column (2)	
NEW PERMIT		OLD PERMIT	
Pollutants	Limitations	Pollutants	Limitations
	(ug/l)		(ug/l)

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-----	-----	-----	-----
-----	-----	-----	-----
-----	-----	-----	-----
-----	-----	-----	-----
-----	-----	-----	-----
-----	-----	-----	-----

ITEM VIII.

Using current POTW biosolids data, fill in Column (1). In Column (2A), list the biosolids criteria that was used at the time your existing TBLLs were calculated. If your POTW is planing on managing its biosolids differently, list in Column (2B) what your new biosolids criteria would be and method of disposal.

		Columns	
Pollutant	Column (1)	(2A)	(2B)
	Biosolids Data Analyses	Biosolids Criteria	
	Average (mg/kg)	From TBLLs (mg/kg)	New (mg/kg)
Arsenic	-----	-----	-----
Cadmium	-----	-----	-----
Chromium	-----	-----	-----
Copper	-----	-----	-----
Cyanide	-----	-----	-----
Lead	-----	-----	-----
Mercury	-----	-----	-----
Nickel	-----	-----	-----
Silver	-----	-----	-----
Zinc	-----	-----	-----
Molybdenum	-----	-----	-----
Selenium	-----	-----	-----
Other (List)	-----	-----	-----
	-----	-----	-----

ATTACHMENT C

NPDES PERMIT REQUIREMENT
FOR
INDUSTRIAL PRETREATMENT ANNUAL REPORT

The information described below shall be included in the pretreatment program annual reports:

1. An updated list of all industrial users by category, as set forth in 40 C.F.R. 403.8(f)(2)(i), indicating compliance or noncompliance with the following:
 - baseline monitoring reporting requirements for newly promulgated industries
 - compliance status reporting requirements for newly promulgated industries
 - periodic (semi-annual) monitoring reporting requirements,
 - categorical standards, and
 - local limits;
2. A summary of compliance and enforcement activities during the preceding year, including the number of:
 - significant industrial users inspected by POTW (include inspection dates for each industrial user),
 - significant industrial users sampled by POTW (include sampling dates for each industrial user),
 - compliance schedules issued (include list of subject users),
 - written notices of violations issued (include list of subject users),
 - administrative orders issued (include list of subject users),
 - criminal or civil suits filed (include list of subject users) and,
 - penalties obtained (include list of subject users and penalty amounts);
3. A list of significantly violating industries required to be published in a local newspaper in accordance with 40 C.F.R. 403.8(f)(2)(vii);
4. A narrative description of program effectiveness including present and proposed changes to the program, such as funding, staffing, ordinances, regulations, rules and/or statutory authority;
5. A summary of all pollutant analytical results for influent, effluent, sludge and any toxicity or bioassay data from the wastewater treatment facility. The summary shall include a comparison of influent sampling results versus threshold inhibitory concentrations for (LAWPCA) Wastewater Treatment System and effluent sampling results versus water quality standards. Such a comparison shall be based on the sampling program

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described in the paragraph below or any similar sampling program described in this Permit.

At a minimum, annual sampling and analysis of the influent and effluent of the (LAWPCA) Wastewater Treatment Plant shall be conducted for the following pollutants:

- | | |
|--------------------|-------------------|
| a.) Total Cadmium | f.) Total Nickel |
| b.) Total Chromium | g.) Total Silver |
| c.) Total Copper | h.) Total Zinc |
| d.) Total Lead | i.) Total Cyanide |
| e.) Total Mercury | j.) Total Arsenic |

The sampling program shall consist of one 24-hour flow-proportioned composite and at least one grab sample that is representative of the flows received by the POTW. The composite shall consist of hourly flow-proportioned grab samples taken over a 24-hour period if the sample is collected manually or shall consist of a minimum of 48 samples collected at 30 minute intervals if an automated sampler is used. Cyanide shall be taken as a grab sample during the same period as the composite sample. Sampling and preservation shall be consistent with 40 CFR Part 136.

6. A detailed description of all interference and pass-through that occurred during the past year;
7. A thorough description of all investigations into interference and pass-through during the past year;
8. A description of monitoring, sewer inspections and evaluations which were done during the past year to detect interference and pass-through, specifying parameters and frequencies;
9. A description of actions being taken to reduce the incidence of significant violations by significant industrial users; and,
10. The date of the latest adoption of local limits and an indication as to whether or not the Town is under a State or Federal compliance schedule that includes steps to be taken to revise local limits.