VERMONT

Vermont Department of Environmental Conservation
Watershed Management Division
1 National Life Drive, Main 2
Montpelier VT 05620-3522
www.watershedmanagement.vt.gov

Agency of Natural Resources

[phone] 802-828-1535
[fax] 802-828-1544

October 27, 2015

Mr. Jeff Strong, Director of Public Works
Town of Springfield
96 Main Street
Springfield, VT 05156

Re: Discharge Permit #3-1154

Dear Mr. Strong:

Enclosed is your copy of the Discharge Permit No. 3-1154 which has been signed on behalf of the Commissioner of the Department of Environmental Conservation. This permit authorizes the discharge of treated wastewater from the Town of Springfield's Wastewater Treatment Facility to the Black River. Also enclosed is a copy of 1272 Order No. 3-1154 for the remaining Combined Sewer Overflow outfalls in Springfield.

Please review the permit carefully and make note of the effluent limitations, monitoring requirements, and other special conditions. As proposed in the draft permit which was provided for comment, this permit contains changes from the permit that currently authorizes your discharge, including the requirements of EPA's Long Island Sound Nitrogen TMDL (See Condition I.B). The TMDL requires the Town to monitor for Total Nitrogen, develop and implement a Nitrogen Optimization Plan, assess the adequacy of the Plan, and annually report the Total Nitrogen discharged from your facility. Additionally, the permit includes requirements to conduct Whole Effluent Toxicity testing and chemical pollutant scans to confirm that this discharge does not have the potential to cause toxic impacts in the river.

We did not receive any comments from the public on the draft permit during the notice period; with respect to the comments submitted by Aldrich + Elliott on behalf of the Town, we have the following responses:

1. The Whole Effluent Toxicity permit condition requires a WET test in both late summer and winter to ensure representative sampling. WET testing has been included to meet the requirements of 40 CFR 122.21.j. This sampling regime is consistent with what is required of other wastewater treatment facilities of similar size. The Agency considers this a fair and reasonable cost of doing business, and the condition to conduct two WET tests remains in the permit.

2. The following extant CSO outfalls have been added to Attachment B of the Discharge Permit:

   CSO #024 (Pump Station #6 / Midway)
   CSO #028 (Bryant Building North Lot)
   CSO #100 (Olive Street)

With respect to the comments submitted in regards to the 1272 Order, we have the following responses:

1. The Agency agrees that a rain gauge for each CSO outfall may not be necessary or appropriate to characterize precipitation amounts specific to a sewer system drainage area. The permit has been modified to require a network of rain gauges sufficient to provide precipitation amounts specific to each CSO subcatchment. While such a network does not necessarily demand a gauge for each CSO outfall, appropriate spatial interpolation techniques shall be used to locate gauge location.

2. Attachment A has been changed to reflect that CSO #024 (Pump Station #6 / Midway) was not eliminated.

3. The CSO outfall located on Olive Street has been added to Attachment A, and designated CSO #100. This CSO outfall shall be physically eliminated by no later than December 31, 2018.

If you have questions regarding the permit, please contact Julia Butzler at (802) 490-6182.

Sincerely,

Ernest F. Kelley, Manager
Wastewater Management Program

Enclosures (3)

cc:
Richard Chambers III, Chief Operator
Jeff Fehrs, Wastewater Management Program, VT DEC
Lynnette Claudon and Robert Pelosi, Clean Water State Revolving Fund Program, VT DEC

AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WATERSHED MANAGEMENT DIVISION
ONE NATIONAL LIFE DRIVE, MAIN BUILDING, 2nd FLOOR
MONTPELIER, VT 05620-3522

Permit No.: 3-1154
PIN: NS95-0042
NPDES No.: VT0100374

Name of Applicant: Town of Springfield
96 Main Street
Springfield, VT 05156

Expiration Date: September 30, 2020

DISCHARGE PERMIT

In compliance with the provisions of the Vermont Water Pollution Control Act as amended (10 V.S.A. chapter 47), the Vermont Water Pollution Control Permit Regulations as amended, and the federal Clean Water Act as amended (33 U.S.C. § 1251 *et seq.*), the Town of Springfield, Vermont (hereinafter referred to as the "Permittee") is authorized by the Secretary of Natural Resources (Secretary) to discharge from the Springfield Wastewater Treatment Facility to the Black River in accordance with the following conditions.

This permit shall become effective on the date of signing.

Alyssa B. Schuren, Commissioner
Department of Environmental Conservation

By: _____ Date: 10/27/15
Ernest F. Kelley, Program Manager
Wastewater and Residuals Management Program
Watershed Management Division

I. SPECIAL CONDITIONS

A. EFFLUENT LIMITS

1. **Until completion of the Combined Sewer Overflow (CSO) abatement project,** the Permittee is authorized to discharge from outfall serial number S/N 001 of the Springfield Wastewater Treatment Facility (WWTF) to the Black River, an effluent for which the characteristics shall not exceed the values listed below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS							
	Annual Average	Monthly Average	Weekly Average	Maximum Day	Monthly Average	Weekly Average	Maximum Day	Instantaneous Maximum
		Mass (**lbs/day**)			Concentration (**mg/L**)			
Flow	2.2 MGD							
Biochemical Oxygen Demand (5-day, 20° C) (BOD_5)		550	826		30	45	50	
Total Suspended Solids (TSS)		550	826		30	45	50	
Total Phosphorus (TP)[1]		16					Monitor only	
Total Nitrogen (TN)[2,3]	See Special Condition I.B						Monitor only	
Total Kjeldahl Nitrogen (TKN)							Monitor only	
Nitrate/Nitrite Nitrogen (NO_x)							Monitor only	
Settleable Solids								1.0 mL/L
Escherichia coli[4]								160/100 mL
pH					Between 6.5-8.5 Standard Units			

[1] The TP mass limitation shall apply from May 1 through October 31; however, TP concentration shall be monitored year-round.
[2] TN = TKN + NO_x
[3] See Total Nitrogen Form WR-43-TN
[4] The *E. coli* limitation is effective from April 1 through October 31 annually. Disinfection is not required from November 1 through March 31.

2. **Upon achieving completion of the CSO abatement project**, the Permittee is authorized to discharge from outfall serial number S/N 001 of the Springfield WWTF to the Black River, an effluent for which the characteristics shall not exceed the values listed below:

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS							
	Annual Average	Monthly Average	Weekly Average	Maximum Day	Monthly Average	Weekly Average	Maximum Day	Instantaneous Maximum
		Mass (lbs/day)			Concentration (mg/L)			
Flow[1]	2.4 MGD							
Biochemical Oxygen Demand[2] (5-day, 20° C) (BOD_5)		550	826		30	45	50	
Total Suspended Solids (TSS)[2]		550	826		30	45	50	
Total Phosphorus (TP)[3]		16					Monitor only	
Total Nitrogen (TN)[4,5]	See Special Condition I.B						Monitor only	
Total Kjeldahl Nitrogen (TKN)							Monitor only	
Nitrate/Nitrite Nitrogen (NO_x)							Monitor only	
Settleable Solids								1.0 mL/L
Escherichia coli[6]								160/100 mL
pH					Between 6.5-8.5 Standard Units			

[1] The flow limit will remain at 2.2 MGD until all remaining CSO locations are in compliance with Vermont's Combined Sewer Overflow Control Policy.
[2] The Permittee shall comply with the more restrictive of the mass and concentration limitations.
[3] The TP mass limitation shall apply from May 1 through October 31; however, TP concentration shall be monitored year-round.
[4] TN = TKN + NO_x
[5] See Total Nitrogen Form WR-43-TN
[6] The *E. coli* limitation is effective from April 1 through October 31 annually. Disinfection is not required from November 1 through March 31.

3. A mixing zone of 200 feet from the point of discharge has been established for *E.coli* under Section 2-04 of the Vermont Water Quality Standards. The water quality standard of 77 colonies/100 mL shall be met at the end of this mixing zone. The limit of 160 colonies/100 mL shall be met at the end of the ultraviolet light (UV) disinfection system.

4. The CSO abatement work shall be considered complete when the Vermont Agency of Natural Resources (Agency) issues a written acknowledgment that all CSO locations are in compliance with Vermont's CSO Control Policy.

5. The effluent shall not have concentrations or combinations of contaminants including oil, grease, scum, foam, or floating solids which would cause a violation of the Vermont Water Quality Standards.

6. The effluent shall not cause visible discoloration of the receiving waters.

7. The monthly average concentrations of Biochemical Oxygen Demand (BOD_5) and Total Suspended Solids (TSS) in the effluent shall not exceed 15 percent of the monthly average concentrations of BOD_5 and TSS in the influent into the Permittee's WWTF. For the purposes of determining whether the Permittee is in compliance with this condition, samples from the effluent and the influent shall be taken with appropriate allowance for detention times. Since the Permittee operates a combined collection system, this requirement does not apply during storm events.

8. If the effluent discharged for a period of 90 consecutive days exceeds 80 percent of the permitted flow limitation, the Permittee shall submit to the Agency projected loadings and a program for maintaining satisfactory treatment levels consistent with approved water quality management plans.

9. The Permittee shall clean the quartz sleeves of the UV disinfection system at a frequency that assures that effective disinfection is maintained and the Permittee shall replace the UV disinfection system lamps as necessary to maintain compliance with the *E. coli* bacteria limitation. **The dates and a description of the UV disinfection system maintenance activities shall be included on the applicable DMR WR-43.**

10. Septage Capacity: The Permittee shall maintain processing capacity for use only in receiving and processing septage for the useful life of the facility as required under 10 V.S.A §1626a (a), (c) and (d): for a minimum of 9,600 gallons of septage per day

    Such septage shall be accepted from any Vermont municipality, and shall not be restricted to specific municipalities. The rate or rates charged for acceptance by the plant of septage from sources other than the users for whom the plant is designed primarily to serve, shall be equal to the rate or rates charged the primary users, and shall not subsidize the primary users.

11. The Permittee shall limit the amount of septage received so that it does not interfere with the proper operation of the WWTF or result in a failure to meet effluent limitations. If the Agency determines that septage does interfere with the proper operation of the facility or

results in the failure to meet effluent limitations, the Agency may amend this permit to incorporate a limitation on septage received.

12. The Permittee shall have the following spare parts available at all times for the secondary clarifiers. When any of the spare parts are utilized to complete a repair, arrangements shall be made to restock the part immediately.

    a. One drive lip seal;
    b. Two full trough shimmer wipers;
    c. One drive control micro switch;
    d. One gear motor; and
    e. One complete column mounted drive assembly.

13. Any action on the part of the Agency in reviewing, commenting upon or approving plans and specifications for the construction of WWTFs shall not relieve the Permittee from the responsibility to achieve effluent limitations set forth in this permit and shall not constitute a waiver of, or act of estoppel against any remedy available to the Agency, the State of Vermont or the federal government for failure to meet any requirement set forth in this permit or imposed by state or federal law.

B. TOTAL NITROGEN

1. Optimization Plan

By **March 31, 2016** the Permittee shall develop and submit to the Agency for review and approval a Nitrogen Removal Optimization Evaluation Plan for the evaluation of alternative methods of operating the existing WWTF to optimize the removal of nitrogen. The methods to be evaluated include: operational, process, equipment changes designed to enhance nitrification and denitrification (seasonal and year-round); incorporation of anoxic zones; septage receiving policies and procedures; and side stream management. The Permittee shall implement these recommended operational changes to maintain a mass discharge of total nitrogen (TN) lower than the existing mass loading of TN. The baseline annual average daily TN load discharge from this facility is estimated to be **approximately 191 lbs/day.**

This plan shall be developed by a qualified professional with experience in the operation and/or design of municipal WWTFs in conjunction with the Chief Operator of the facility.

This plan shall be provided to the Agency for review and approval prior to implementation and shall be revised by the Permittee upon the Agency's request to address equipment or operational changes.

Implementation of the plan shall commence within 30 days of its approval by the Agency.

2. Plan Evaluation

Within one year following the implementation, the Permitee shall evaluate the effectiveness of the plan. The evaluation shall be conducted by a qualified professional with experience in the operation and/or design of municipal WWTFs in conjunction with the Chief Operator of the facility. The results of the evaluation shall be submitted to the Agency for review and approval within one year and six months following the implementation of the plan and shall be revised at the Agency's request. Actions to implement the approved nitrogen removal optimization practices, if any, shall be initiated within 90 days of the Agency's approval.

3. Reporting

Annually, beginning with the data from January 2016, the Permittee shall submit a report to the Agency as an attachment to the **December** Discharge Monitoring Report form WR-43 (DMR WR-43) that documents the annual average daily TN discharged (in pounds per day) from the facility, summarizes nitrogen removal optimization and efficiencies, and tracks trends relative to the previous year.

TN = Total Kjeldahl Nitrogen (TKN) + Nitrite/Nitrate (NO_x).

The TN pounds per day, annual average, shall be based on the sum of the Total Monthly Pounds of TN discharged for the calendar year and shall be calculated as follows:

1. Determine the Total Monthly TN in pounds:

Total Monthly TN pounds = (Monthly Average TN concentration (mg/L) x Total Monthly Flow (MG)) x 8.34

2. Calculate the TN, pounds per day, annual average:

(Sum of the Total Monthly TN pounds for each month of the calendar year)/365 days

4. Wasteload Allocation

This permit does not establish a formal Waste Load Allocation for the facility nor does it convey any right to ownership of the facility's estimated baseline annual average TN load.

The Agency reserves the right to reopen and amend this permit to include an alternate TN limitation and/or additional monitoring requirements based on the monitoring data, the results of nitrogen optimization activities, or a formal Waste Load Allocation promulgated under Vermont's Waste Load Allocation Rule for Total Nitrogen in the Connecticut River Watershed based on the Long Island Sound Total Nitrogen Total Maximum Daily Load.

C. TOTAL PHOSPHORUS

In addition to the numerical limitations set forth in Section I.A.1 and I.A.2, the Permittee shall continue to operate the wastewater treatment facility to remove phosphorus to a level appropriate to achieve compliance with the Vermont Water Quality Standards.

Based on the monitoring as required in Section H.2 below, the Agency may require additional effluent phosphorus monitoring, instream chemical and/or biological monitoring, and further phosphorus removal.

D. WASTE MANAGEMENT ZONE

In accordance with 10 V.S.A. § 1252, this permit hereby establishes a waste management zone that extends from the outfall of the Springfield WWTF in the Black River downstream 3.1 miles.

E. REAPPLICATION

If the Permittee desires to continue to discharge after the expiration of this permit, the Permittee shall reapply on the application forms then in use at least 180 days before this permit expires.

Reapply for a Discharge Permit by: March 31, 2020

F. OPERATING FEES

This discharge is subject to operating fees as required by 3 V.S.A. § 2822.

G. TOXICITY TESTING

1. Whole Effluent Toxicity (WET) testing.

a. During **August or September 2017**, the Permittee shall conduct a two-species (*Pimephales promelas* and *Ceriodaphnia dubia*) acute WET test on a composite effluent sample collected from S/N 001. The results shall be submitted to the Agency by **December 31, 2017**.

b. During **January or February 2019**, the Permittee shall conduct a two-species (*P. promelas* and *C. dubia*) acute WET test on a composite effluent sample collected from S/N 001. The results shall be submitted to the Agency by **March 31, 2019**.

c. The WET tests shall be conducted according to the procedures and guidelines specified in "Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms" (October 2002 or, if a newer edition is available, the most recent edition) U.S. EPA document.

2. **By December 31, 2016, December 31, 2017 and September 30, 2018,** the Permittee shall conduct an effluent analysis of S/N 001 for the pollutants included in Appendix J, Table 2 of 40 CFR Part 122 (see Attachment A) and submit the results to the Agency.

Based upon the results of these tests or any other toxicity tests conducted, the Agency reserves the right to reopen and amend this permit to require additional WET testing or a Toxicity Reduction Evaluation be conducted.

H. MONITORING AND REPORTING

1. Sampling and Analysis

The sampling, preservation, handling, and analytical methods used shall conform to the test procedures published in 40 C.F.R. Part 136.

Samples shall be representative of the volume and quality of effluent discharged over the sampling and reporting period. All samples are to be taken during normal operating hours. The Permittee shall identify the effluent sampling location used for each discharge.

2. Effluent Monitoring

The Permittee shall monitor and record the quality and quantity of discharge(s) at outfall serial number S/N 001 of the Springfield WWTF, according to the following schedule and other provisions: until September 30, 2020

During the period of May 1 through October 31:

PARAMETER	MINIMUM FREQUENCY OF ANALYSIS	SAMPLE TYPE
Flow	Continuous	Daily Total, Max., Min.
Biochemical Oxygen Demand (BOD_5)	1 × week	composite[1]
Total Suspended Solids (TSS)	1 × week	composite[1]
Total Phosphorus (TP)	1 × week	composite[1]
Total Nitrogen (TN)	1 × week	[calculated[2,3]]
Total Kjeldahl Nitrogen (TKN)	1 × week	composite[1,3]
Nitrate/Nitrite Nitrogen (NO_x)	1 × week	composite[1,3]
Settleable Solids	1 × day	grab[4]
Escherichia coli	1 × week	grab
pH	1 × day	grab

[1] Composite samples for BOD_5, TSS, TP, TKN and NO_x shall, at a minimum, be taken during the hours 6:00 AM to 6:00 PM, unless otherwise specified. Eight hours is the minimum period for the composite, 24 hours is the maximum for the composite.
[2] TN = TKN + NO_x
[3] Submit results each month on Total Nitrogen Monitoring Report Form WR-43-TN.
[4] Settleable Solids samples shall be collected between 10:00 AM and 2:00 PM or during the period of peak flow.

During the period of November 1 through April 31:

PARAMETER	MINIMUM FREQUENCY OF ANALYSIS	SAMPLE TYPE
Flow	Continuous	Daily Total, Max., Min.
Biochemical Oxygen Demand (BOD_5)	1 × week	composite[1]
Total Suspended Solids (TSS)	1 × week	composite[1]
Total Phosphorus (TP)	2 × month	composite[1]
Total Nitrogen (TN)	2 × month	[calculated[2,3]]
Total Kjeldahl Nitrogen (TKN)	2 × month	composite[1,3]
Nitrate/Nitrite Nitrogen (NO_x)	2 × month	composite[1,3]
Settleable Solids	1 × day	grab[4]
Escherichia coli	1 × week	grab[5]
pH	1 × day	grab

[1] Composite samples for BOD_5, TSS, TP, TKN and NO_x shall, at a minimum, be taken during the hours 6:00 AM to 6:00 PM, unless otherwise specified. Eight hours is the minimum period for the composite, 24 hours is the maximum for the composite.
[2] TN = TKN + NO_x
[3] Submit results each month on Total Nitrogen Monitoring Report Form WR-43-TN.
[4] Settleable Solids samples shall be collected between 10:00 AM and 2:00 PM or during the period of peak flow.
[5] Monitoring for *E.coli* is not required during the period of November 1 through March 31.

3. Annually, by December 31, the Permittee shall monitor S/N 001 and submit the results, including units of measurement, as an attachment to the DMR WR-43 for the month in which the samples were taken for the following parameters:

Temperature
Ammonia (as N)
Dissolved Oxygen
Oil & Grease
Total Dissolved Solids

Grab samples shall be used for Temperature, Ammonia, Dissolved Oxygen, and Oil & Grease; a composite sample shall be used for Total Dissolved Solids. Samples shall be representative of the seasonal variation in the discharge.

4. Influent Monitoring

The Permittee shall monitor the quality of the influent according to the following schedule and other provisions.

PARAMETER	MINIMUM FREQUENCY OF ANALYSIS	SAMPLE TYPE
Biochemical Oxygen Demand (BOD_5)	1 × month	composite[1]
Total Suspended Solids (TSS)	1 × month	composite[1]
Total Nitrogen (TN)	1 × quarter	[calculated[2,3]]
Total Kjeldahl Nitrogen (TKN)	1 × quarter	composite[1,3,4]
Nitrate/Nitrite Nitrogen (NO_x)	1 × quarter	composite[1,3,4]

[1] Composite samples for BOD_5, TSS, TKN and NO_x shall, at a minimum, be taken during the hours 6:00 AM to 6:00 PM, unless otherwise specified. Eight hours is the minimum period for the composite, 24 hours is the maximum for a composite.
[2] $TN = TKN + NO_x$
[3] Submit results each month on Total Nitrogen Monitoring Report Form WR-43-TN.
[4] The influent TKN and NO_x sample shall be collected on the same day as an effluent TKN and NO_x sample.

5. Reporting

The Permittee is required to submit monthly reports of monitoring results on form DMR WR-43. Reports are due on the 15th day of each month, beginning with the month following the effective date of this permit.

If, in any reporting period, there has been no discharge, the Permittee must submit that information by the report due date.

Signed copies of these, and all other reports required herein, shall be submitted to the Secretary at the following address:

Agency of Natural Resources
Department of Environmental Conservation
Watershed Management Division
One National Life Drive, Main Building, 2nd Floor
Montpelier, VT 05620-3522

All reports shall be signed:

a. In the case of corporations, by a principal executive officer of at least the level of vice president, or his/her duly authorized representative, if such representative is responsible for the overall operation of the facility from which the discharge described in the permit form originates and the authorization is made in writing and submitted to the Agency;

b. In the case of a partnership, by a general partner;

c. In the case of a sole proprietorship, by the proprietor; or

d. In the case of a municipal, State, or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

In addition to the monitoring and reporting requirements given above, daily monitoring of certain parameters for operational control shall be submitted to the Agency on the DMR WR-43. Operations reports shall be submitted monthly.

6. Recording of Results

The Permittee shall maintain records of all information resulting from any monitoring activities required, including:

a. The exact place, date, and time of sampling or measurement;

b. The individual(s) who performed the sampling or measurements;

c. The dates and times the analyses were performed;

d. The individual(s) who performed the analyses;

e. The analytical techniques and methods used including sample collection handling and preservation techniques;

f. The results of such analyses;

g. The records of monitoring activities and results, including all instrumentation and calibration and maintenance records; and

h. The original calculation and data bench sheets of the operator who performed analysis of the influent or effluent pursuant to requirements of Section I.A of this permit.

The results of monitoring requirements shall be reported (in the units specified) on the Vermont reporting form DMR WR-43 or other forms approved by the Agency.

7. Additional Monitoring

If the Permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the DMR WR-43. Such increased frequency shall also be indicated.

I. COMBINED SEWER OVERFLOWS (CSOs)

Discharges from the CSO locations listed in Attachment B of this permit do not meet the requirements of the Vermont Water Quality Standards. Therefore, the Agency, pursuant to Vermont's Combined Sewer Overflow Control Policy and concurrent with the issuance of this permit, issued 1272 Order 3-1154 to bring these CSO locations into compliance with the Vermont Water Quality Standards by requiring elimination of CSO locations and, as required by U.S. EPA's 1994 Combined Sewer Overflow Control Policy, compliance with the "Minimum Controls". The Permittee shall implement the following "Minimum Controls" to abate CSO events and the effects on the quality of the receiving water:

a. Implementation of proper operation and regular maintenance programs for the sewer system and the combined sewer overflow such as routine catch-basin, sewer, and interceptor cleaning;

b. Maximizing the use of the collection system for storage;

c. Maximizing wet-weather flow to the wastewater treatment facility;

d. Elimination of any discharge from combined sewer overflow during dry weather;

e. Control of solid and floatable material in the combined sewer overflow;

f. Pollution prevention programs such as litter control and street sweeping to reduce the contaminants in the combined sewer overflow discharge;

g. Implementation of a public notification process to ensure that the public receives adequate notification of when and where a combined sewer overflow discharge occurs; and

h. Monitoring to characterize the impacts of the combined sewer overflow discharge and to determine the effectiveness of these controls.

J. DRY WEATHER FLOWS

Dry weather flows of untreated municipal wastewater from any sanitary or combined sewers are not authorized by this permit and are specifically prohibited by state and federal laws and regulations.

The Permittee shall visually inspect all CSO locations listed on Attachment B and any other discharge point of the sanitary or combined sewer system which may exist. This visual

inspection shall be conducted once per month during the period June 1 through September 30. For the purposes of such inspections, the date of the inspection should be proceeded by at least three days of dry weather. An inspection report detailing the results of each inspection shall be submitted to the Agency monthly, along with the DMR WR-43.

Should any dry weather flows be observed from any CSO location or any other discharge point, the Permittee shall take immediate corrective action to eliminate the causes of such flows. All dry weather flows must be eliminated as soon as possible, but no later than one month from detection, unless a longer period of time is approved, in writing, by the Agency.

The Permittee shall use the Agency's on-line reporting system to report dry weather flow events within 24 hours of the occurrence of an event. If for any reason the on-line system is not operable, the Permittee shall provide notice to the Agency via phone or email within 24 hours of the occurrence of the event.

For any dry weather flows identified, the Permittee shall submit in the monthly inspection report, the following:

a. the discharge location;

b. the cause of the flow

c. flow estimate – measure depth of water in overflow pipe; and

d. a plan and schedule for correction.

K. OPERATION, MANAGEMENT, AND EMERGENCY RESPONSE PLANS

1. The Permittee shall implement the Operation, Management, and Emergency Response Plan for the WWTF, pump stations, and stream crossings as approved by the Agency on June 16, 2009.

2. The Permittee shall implement the Operation, Management, and Emergency Response Plan for the sewage collection system as approved by the Agency on September 30, 2010.

The Permittee shall revise these plans upon the Agency's request or on its own motion to reflect equipment or operational changes.

L. EMERGENCY ACTION - ELECTRIC POWER FAILURE

The Permittee shall indicate in writing to the Agency **within 30 days after the effective date of this permit** that the discharge shall be handled in such a manner that, in the event the primary source of electric power to the WWTF (including pump stations) fails, any discharge into the receiving waters will attempt to comply with the conditions of this permit, but in no case shall the wastes receive less than primary treatment (or in the case of UV disinfection systems, not less than secondary treatment) plus disinfection.

The Permittee shall either provide an alternative source of power for the operation of its WWTF, or demonstrate that the treatment facility has the capacity to store the wastewater volume that would be generated over the duration of the longest power failure that would have affected the facility in the last five years, excluding catastrophic events.

The alternative power supply, whether from a generating unit located at the WWTF or purchased from an independent source of electricity, must be separate from the existing power source used to operate the WWTF. If a separate unit located at the WWTF is to be used, the Permittee shall certify in writing to the Agency when the unit is completed and prepared to generate power.

The determination of treatment system storage capacity shall be submitted to the Agency upon completion.

M. SEWER ORDINANCE

The Permittee shall have in effect a sewer use ordinance acceptable to the Agency which, at a minimum, shall

1. Prohibit the introduction by any person into the Permittee's sewerage system or WWTF of any pollutant which:

   a. Is a toxic pollutant in toxic amounts as defined in standards issued from time to time under Section 307(a) of the Clean Water Act;

   b. Creates a fire or explosion hazard in the Permittee's treatment works;

   c. Causes corrosive structural damage to the Permittee's treatment works, including all wastes with a pH lower than 5.0;

   d. Contains solid or viscous substances in amounts which would cause obstruction to the flow in sewers or other interference with proper operation of the Permittee's treatment works; or

   e. In the case of a major contributing industry, as defined in this permit, contains an incompatible pollutant, as defined in this permit, in an amount or concentration in excess of that allowed under standards or guidelines issued from time to time pursuant to Sections 304, 306, and/or 307 of the Clean Water Act.

2. Require 45 days prior notification to the Permittee by any person or persons of a:

   a. Proposed substantial change in volume or character of pollutants over that being discharged into the Permittee's treatment works at the time of issuance of this permit;

   b. Proposed new discharge into the Permittee's treatment works of pollutants from any source which would be a new source as defined in Section 306 of the Clean Water Act if such source were discharging pollutants; or

c. Proposed new discharge into the Permittee's treatment works of pollutants from any source which would be subject to Section 301 of the Clean Water Act if it were discharging such pollutants.

3. Require any industry discharging into the Permittee's treatment works to perform such monitoring of its discharge as the Permittee may reasonably require, including the installation, use, and maintenance of monitoring equipment and monitoring methods, keeping records of the results of such monitoring, and reporting the results of such monitoring to the Permittee. Such records shall be made available by the Permittee to the Agency upon request.

4. Authorize the Permittee's authorized representatives to enter into, upon, or through the premises of any industry discharging into the Permittee's treatment works to have access to and copy any records, to inspect any monitoring equipment or method required under subsection 3 above, and to sample any discharge into the Permittee's treatment works.

The Permittee shall notify the Agency of any discharge specified in subsection 2 above within 30 days of the date on which the Permittee is notified of such discharge. This permit may be modified accordingly.

II. GENERAL CONDITIONS

A. MANAGEMENT REQUIREMENTS

1. Facility Modification / Change in Discharge

All discharges authorized herein shall be consistent with the terms and conditions of this permit. The discharge of any pollutant more frequently than, or at a level in excess of, that identified and authorized by this permit shall constitute a violation of the terms and conditions of this permit. Such a violation may result in the imposition of civil and/or criminal penalties pursuant to 10 V.S.A. chapters 47, 201, and/or 211. Any anticipated facility alterations or expansions or process modifications which will result in new, different, or increased discharges of any pollutants must be reported by submission of a new permit application or, if such changes will not violate the effluent limitations specified in this permit, by notice to the Agency of such changes. Following such notice, the permit may be modified to specify and limit any pollutants not previously limited.

In addition, the Permittee shall provide notice to the Agency of the following:

a. Any new introduction of pollutants into the treatment works from a source which would be a new source as defined in Section 306 of the Clean Water Act if such source were discharging pollutants;

b. Except for such categories and classes of point sources or discharges specified by the Agency, any new introduction of pollutants into the treatment works from a source which would be subject to Section 301 of the Clean Water Act if such source were discharging pollutants; and

c. Any substantial change in volume or character of pollutants being introduced into the treatment works by a source introducing pollutants into such works at the time of issuance of the permit.

The notice shall include:

i. The quality and quantity of the discharge to be introduced into the system, and

ii. The anticipated impact of such change in the quality or quantity of the effluent to be discharged from the WWTF.

2. Noncompliance Notification

The Permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

In the event the Permittee is unable to comply with any of the conditions of this permit due, among other reasons, to:

a. Breakdown or maintenance of waste treatment equipment (biological and physical-chemical systems including all pipes, transfer pumps, compressors, collection ponds or tanks for the segregation of treated or untreated wastes, ion exchange columns, or carbon absorption units);

b. Accidents caused by human error or negligence;

c. Any unanticipated bypass or upset which exceeds any effluent limitation in the permit;

d. Violation of a maximum day discharge limitation for any of the pollutants listed by the Agency in this permit; or

e. Other causes such as acts of nature,

the Permittee shall notify the Agency within 24 hours of becoming aware of such condition and shall provide the Agency with the following information, in writing, within five days:

i. Cause of non-compliance;

ii. A description of the non-complying discharge including its impact upon the receiving water;

iii. Anticipated time the condition of non-compliance is expected to continue or, if such condition has been corrected, the duration of the period of non-compliance;

iv. Steps taken by the Permittee to reduce and eliminate the non-complying discharge; and

v. Steps to be taken by the Permittee to prevent recurrence of the condition of non-compliance.

3. Operation and Maintenance

All waste collection, control, treatment, and disposal facilities shall be operated in a manner consistent with the following:

a. The Permittee shall, at all times, maintain in good working order and operate as efficiently as possible all treatment and control facilities and systems (and related appurtenances) installed or used by the Permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by the Permittee only when the operation is necessary to achieve compliance with the conditions of this permit.

b. The Permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance, and testing functions required to insure compliance with the conditions of this permit; and

c. The operation and maintenance of this facility shall be performed only by qualified personnel. The personnel shall be certified as required under the Vermont Wastewater Treatment Facility Operator Certification Rule.

4. Quality Control

The Permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at regular intervals to ensure accuracy of measurements, or shall ensure that both activities will be conducted.

The Permittee shall keep records of these activities and shall provide such records upon request of the Agency.

The Permittee shall demonstrate the accuracy of the effluent flow measurement device weekly and report the results on the monthly report forms. The acceptable limit of error is ± 10%.

The Permittee shall analyze any additional samples as may be required by the Agency to ensure analytical quality control.

5. Bypass

The bypass of facilities (including pump stations) is prohibited, except where authorized under the terms and conditions of an Emergency Pollution Permit issued pursuant to 10 V.S.A. § 1268. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the activity in order to maintain compliance with the conditions of this permit.

6. Duty to Mitigate

The Permittee shall take all reasonable steps to minimize or prevent any adverse impact to waters of the State resulting from non-compliance with any condition specified in this permit, including accelerated or additional monitoring as necessary to determine the nature and impact of the non-complying discharge.

7. Records Retention

All records and information resulting from the monitoring activities required by this permit including all records of analyses performed, all calibration and maintenance of instrumentation records and all original chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit shall be retained for a minimum of three years, and shall be submitted to the Agency upon request. This period shall be extended during the course of unresolved litigation regarding the discharge of pollutants or when requested by the Agency.

8. Solids Management

Collected screenings, sludges, and other solids removed in the course of treatment and control of wastewaters shall be stored, treated and disposed of in accordance with 10 V.S.A. chapter 159 and with the terms and conditions of any certification, interim or final, transitional operation authorization or order issued pursuant to 10 V.S.A. chapter 159 that is in effect on the effective date of this permit or is issued during the term of this permit.

9. Emergency Pollution Permits

Maintenance activities, or emergencies resulting from equipment failure or malfunction, including power outages, which result in an effluent which exceeds the effluent limitations specified herein, shall be considered a violation of the conditions of this permit, unless the Permittee immediately applies for, and obtains, an emergency pollution permit under the provisions of 10 V.S.A. § 1268. The Permittee shall notify the Agency of the emergency situation by the next working day.

10 V.S.A. § Section 1268 reads as follows:

> When a discharge permit holder finds that pollution abatement facilities require repairs, replacement or other corrective action in order for them to continue to meet standards specified in the permit, he may apply in the manner specified by the secretary for an emergency pollution permit for a term sufficient to effect repairs, replacements or other corrective action. The permit may be issued without prior public notice if the nature of the emergency will not provide sufficient time to give notice; provided that the secretary shall give public notice as soon as possible but in any event no later than five days after the effective date of the emergency pollution permit. No emergency pollution permit shall be issued unless the applicant certifies and the secretary finds that:

(1) there is no present, reasonable alternative means of disposing of the waste other than by discharging it into the waters of the state during the limited period of time of the emergency;

(2) the denial of an emergency pollution permit would work an extreme hardship upon the applicant;

(3) the granting of an emergency pollution permit will result in some public benefit;

(4) the discharge will not be unreasonably harmful to the quality of the receiving waters;

(5) the cause or reason for the emergency is not due to wilful or intended acts or omissions of the applicant.

Application shall be made to the Secretary at the following address: Agency of Natural Resources, Department of Environmental Conservation, One National Life Drive, Main Building, 2nd Floor, Montpelier VT 05620-3522.

B. RESPONSIBILITIES

1. Right of Entry

The Permittee shall allow the Agency or authorized representative, upon the presentation of proper credentials:

a. To enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

b. To have access to and copy, at reasonable times, any records required to be kept under the terms and conditions of this permit;

c. To inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

d. To sample or monitor, at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

2. Transfer of Ownership or Control

This permit is not transferable without prior written approval of the Agency. All application and operating fees must be paid in full prior to transfer of this permit. In the event of any change in control or ownership of facilities from which the authorized discharges emanate, the Permittee shall provide a copy of this permit to the succeeding owner or controller and shall send written notification of the change in ownership or

control to the Agency **at least 30 days in advance of the proposed transfer date.** The notice to the Agency shall include a written agreement between the existing and new Permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them. The Permittee shall also inform the prospective owner or operator of their responsibility to make an application for transfer of this permit.

This request for transfer application must include as a minimum:

a. A properly completed application form provided by the Agency and the applicable processing fee.

b. A written statement from the prospective owner or operator certifying:

i. The conditions of the operation that contribute to, or affect, the discharge will not be materially different under the new ownership;

ii. The prospective owner or operator has read and is familiar with the terms of the permit and agrees to comply with all terms and conditions of the permit; and

iii. The prospective owner or operator has adequate funding to operate and maintain the treatment system and remain in compliance with the terms and conditions of the permit.

c. The date of the sale or transfer.

The Agency may require additional information dependent upon the current status of the facility operation, maintenance, and permit compliance.

3. Confidentiality

Pursuant to 10 V.S.A. § 1259(b):

> Any records, reports or information obtained under this permit program shall be available to the public for inspection and copying. However, upon a showing satisfactory to the secretary that any records, reports or information or part thereof, other than effluent data, would, if made public, divulge methods or processes entitled to protection as trade secrets, the secretary shall treat and protect those records, reports or information as confidential. Any records, reports or information accorded confidential treatment will be disclosed to authorized representatives of the state and the United States when relevant to any proceedings under this chapter.

Claims for confidentiality for the following information will be denied:

a. The name and address of any permit applicant or Permittee.

b. Permit applications, permits, and effluent data.

c. Information required by application forms, including information submitted on the forms themselves and any attachments used to supply information required by the forms.

4. Permit Modification, Suspension, and Revocation

After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including the following:

a. Violation of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.

The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance shall not stay any permit condition.

The Permittee shall provide to the Agency, within a reasonable time, any information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The Permittee shall also furnish to the Agency upon request, copies of records required to be kept by this permit.

5. Toxic Effluent Standards

If a toxic effluent standard or prohibition (including any schedule of compliance specified in such effluent standard or prohibition) is established under section 307(a) of the Clean Water Act for a toxic pollutant which is present in the Permittee's discharge and such standard or prohibition is more stringent than any limitation upon such pollutant in this permit, then this permit shall be modified or revoked and reissued in accordance with the toxic effluent standard or prohibition and the Permittee so notified.

6. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of legal action or relieve the Permittee from any responsibilities, liabilities, or penalties to which the Permittee is or may be subject under 10 V.S.A. § 1281.

7. Other Materials

Other materials ordinarily produced or used in the operation of this facility, which have been specifically identified in the application, may be discharged at the maximum frequency and maximum level identified in the application, provided:

a. They are not:

   i. Designated as toxic or hazardous under provisions of Sections 307 and 311, respectively, of the Clean Water Act, or

   ii. Known to be hazardous or toxic by the Permittee, except that such materials indicated in (a) and (b) above may be discharged in certain limited amounts with the written approval of, and under special conditions established by, the Agency or his designated representative, if the substances will not pose any imminent hazard to the public health or safety;

b. The discharge of such materials will not violate the Vermont Water Quality Standards; and

c. The Permittee is not notified by the Agency to eliminate or reduce the quantity of such materials entering the watercourse.

8. Navigable Waters

This permit does not authorize or approve the construction of any onshore or offshore physical structures or facilities or the undertaking of any work in any navigable waters.

9. Civil and Criminal Liability

Except as provided in "Emergency Action – Electric Power Failure" (Section I.K), "Bypass" (Section II.A.5), and "Emergency Pollution Permits" (Section II.A.9), nothing in this permit shall be construed to relieve the Permittee from civil or criminal penalties for noncompliance. Civil and criminal penalties for non-compliance are provided for in 10 V.S.A. Chapters 47, 201, and 211.

10. State Laws

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the Permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable state law or regulation under authority preserved by Section 510 of the Clean Water Act.

11. Property Rights

Issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

12. Other Information

If the Permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Agency, it shall promptly submit such facts or information.

13. Severability

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

14. Authority

This permit is issued under authority of 10 V.S.A. §§1258 and 1259 of the Vermont Water Pollution Control Act, the Vermont Water Pollution Control Permit Regulation, and Section 402 of the Clean Water Act, as amended.

15. Definitions

For purposes of this permit, the following definitions shall apply.

Agency – The Vermont Agency of Natural Resources

Annual Average - The highest allowable average of daily discharges calculated as the sum of all daily discharges (mg/L, lbs or gallons) measured during a calendar year divided by the number of daily discharges measured during that year.

Average - The arithmetic means of values taken at the frequency required for each parameter over the specified period.

Bypass – The intentional diversion of waste streams from any portion of the treatment facility.

The Clean Water Act - The federal Clean Water Act, as amended (33 U.S.C. § 1251, *et seq.*).

Composite Sample - A sample consisting of a minimum of one grab sample per hour collected during a 24-hour period (or lesser period as specified in the section on Monitoring and Reporting) and combined proportionally to flow over that same time period.

Daily Discharge - The discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling.

For pollutants with limitations expressed in pounds the daily discharge is calculated as the total pounds of pollutants discharged over the day.

For pollutants with limitations expressed in mg/L the daily discharge is calculated as the average measurement of the pollutant over the day.

Discharge – Any wastes, directly or indirectly, that are placed, deposited or emitted into waters of the state.

Grab Sample - An individual sample collected in a period of less than 15 minutes.

Incompatible Substance – Any waste being discharged into the treatment works which interferes with, passes through without treatment, or is otherwise incompatible with said works or would have a substantial adverse effect on the works or on water quality. This includes all pollutants required to be regulated under the Clean Water Act.

Instantaneous Maximum - A value not to be exceeded in any grab sample.

Major Contributing Industry - One that: (1) has a flow of 50,000 gallons or more per average work day; (2) has a flow greater than five percent of the flow carried by the municipal system receiving the waste; (3) has in its wastes a toxic pollutant in toxic amounts as defined in standards issued under Section 307(a) of the Clean Water Act; or (4) has a significant impact, either singly or in combination with other contributing industries, on a publicly owned treatment works or on the quality of effluent from that treatment works.

Maximum Day (maximum daily discharge limitation) - The highest allowable "daily discharge" (mg/L, lbs or gallons).

Mean - The mean value is the arithmetic mean.

Monthly Average (Average monthly discharge limitation) - The highest allowable average of daily discharges (mg/L, lbs or gallons) over a calendar month, calculated as the sum of all daily discharges (mg/L, lbs or gallons) measured during a calendar month divided by the number of daily discharges measured during that month.

NPDES - The National Pollutant Discharge Elimination System.

Secretary - The Secretary of the Agency of Natural Resources

State Certifying Agency Agency of Natural Resources
Department of Environmental Conservation
Watershed Management Division
One National Life Drive, Main Building, 2nd Floor
Montpelier, VT 05620-3522

Waste – Effluent, sewage or any substance or material, liquid, gaseous, solid or radioactive, including heated liquids, whether or not harmful or deleterious to waters.

Waste Management Zone – A specific reach of Class B waters designated by a permit to accept the discharge of properly treated wastes that prior to treatment contained organisms pathogenic to human beings. Throughout the receiving waters, water quality criteria must be achieved but increased health risks exist due to the authorized discharge.

Weekly Average - (Average weekly discharge limitation) - The highest allowable average of daily discharges (mg/L, lbs or gallons) over a calendar week, calculated as the sum of all daily discharges (mg/L, lbs or gallons) measured during a calendar week divided by the number of daily discharges measured during that week.

ATTACHMENT A

Hardness (of receiving water, upstream of outfall)

Metals (total recoverable), cyanide and total phenols:
Antimony
Arsenic
Beryllium
Cadmium
Copper
Lead
Mercury
Nickel
Selenium
Silver
Thallium
Zinc
Cyanide
Total phenolic compounds

Volatile organic compounds:
acrolein
acrylonitrile
benzene
bromoform
carbon tetrachloride
chlorobenzene
chlorodibromomethane
chloroethane
2-chloroethylvinyl ether
chloroform
dichlorobromomethane
1,1-dichloroethane
1,2-dichloroethane
Trans-1,2-dichloroethylene
1,1-dichloroethylene
1,2-dichloropropane
1,3-dichloropropylene
ethylbenzene
methyl bromide
methyl chloride
methylene chloride
1,1,2,2-tetrachloroethane
tetrachloroethylene
toluene
1,1,1-trichloroethane
1,1,2-trichloroethane
trichloroethylene
vinyl chloride

Acid-extractable compounds:
p-chloro-m-cresol
2-chlorophenol2,4-dichlorophenol
2,4-dimethylphenol
4,6-dinitro-o-cresol
2,4-dinitrophenol
2-nitrophenol
4-nitrophenol
pentachlorophenol
phenol
2,4,6-trichlorophenol

Base-neutral compounds:
acenaphthene
acenaphthylene
anthracene
benzidine
benzo(a)anthracene
benzo(a)pyrene
3,4-benzofluoranthene
benzo(ghi)perylene
benzo(k)fluoranthene
bis(2-chloroethoxy)methane
bis(2-chloroethyl)ether
bis(2-chloroisopropyl)ether
bis(2-ethylhexyl)phthalate
4-bromophenyl phenyl ether
butyl benzyl phthalate
2-chloronaphthalene
4-chlorophenyl phenyl ether
chrysene
di-n-butyl phthalate
di-n-octyl phthalate
dibenzo(a,h)anthracene
1,2-dichlorobenzene
1,3-dichlorobenzene
1,4-dichlorobenzene
3,3'-dichlorobenzidine
diethyl phthalate
dimethyl phthalate
2,4-dinitrotoluene
2,6-dinitrotoluene
1,2-diphenylhydrazine
fluroranthene
fluorene
hexachlorobenzene
hexachlorobutadiene
hexachlorocyclo-pentadiene
hexachloroethane
indeno(1,2,3-cd)pyrene
isophorone
napthalene
nitrobenzene
N-nitrosodi-n-propylamine
N-nitrosodimethylamine
N-nitrosodiphenylamine
phenanthrene
pyrene
1,2,4-trichlorobenzene

[65 FR 42469, August 4, 1999]

ATTACHMENT B

S/N 002: CSO # 003
Location: Pump Station #1 / Clinton Street
Receiving Water: Black River

S/N 003: CSO # 004
Location: Behind J&L building #1
Receiving Water: Black River

S/N 004: CSO # 005
Location: Downstream of Bridge Street siphon
Receiving Water: Black River

S/N 006: CSO # 007
Location: Behind Fire Station
Receiving Water: Black River

S/N 007: CSO # 008
Location: Clinton & Love Street
Receiving Water: Black River

S/N 008: CSO # 009
Location: Clinton Street at Land Rover
Receiving Water: Black River

S/N 010: CSO # 011
Location: Community Center Bridge
Receiving Water: Black River

S/N 011: CSO # 012
Location: Mineral Street
Receiving Water: Black River

S/N 012: CSO # 013
Location: Park Street Bridge
Receiving Water: Black River

S/N 016: CSO # 018
Location: Lewis Street & Pine Street
Receiving Water: Black River

S/N 017: CSO # 020
Location: Riverside upstream siphon
Receiving Water: Black River

CSO # 024
Location: Pump Station #6 / Midway
Receiving Water: Black River

S/N 020 CSO # 028
Location: Bryant Building North Lot
Receiving Water: Black River

CSO # 100
Location: Olive Street
Receiving Water: Black River

PNEUMATIC PLUG PREVENTS ROOF DRAINAGE FROM ENTERING SEWER SYSTEM

AGENCY OF NATURAL RESOURCES
DEPARTMENT OF ENVIRONMENTAL CONSERVATION
WATERSHED MANAGEMENT DIVISION
ONE NATIONAL LIFE DRIVE, MAIN BUILDING, 2ND FLOOR
MONTPELIER, VT 05620-3522

FACT SHEET
(October 2015)

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

PERMIT NO: 3-1154
PIN: NS95-0042
NPDES NO: VT0100374

NAME AND ADDRESS OF APPLICANT:

Town of Springfield
96 Main Street
Springfield, VT 05156

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Springfield Wastewater Treatment Facility
Charlestown Road
Springfield, Vermont

RECEIVING WATER: Black River

CLASSIFICATION: Class B with a waste management zone. Class B waters are suitable for swimming and other forms of water-based recreation and irrigation of crops and other agricultural uses without treatment; good aesthetic value; aquatic biota and wildlife sustained by high quality aquatic habitat; suitable for boating, fishing, and other recreational uses; acceptable for public water supply with filtration and disinfection. A waste management zone is a specific reach of Class B waters designated by a permit to accept the discharge of properly treated wastes that prior to treatment contained organisms pathogenic to human beings.

I. Proposed Action, Type of Facility, and Discharge Location

The Vermont Agency of Natural Resources (Agency) received a renewal application for the permit to discharge into the designated receiving water from the above named applicant on March 31, 2003. At this time the Agency has made a tentative decision to reissue the discharge permit. The facility is engaged in the treatment of municipal wastewater. The discharge is from the outfall of the Town of Springfield's Wastewater Treatment Facility (WWTF) to the Black River.

II. Description of Discharge

A quantitative description of the discharge in terms of significant effluent parameters is based on state and federal laws and regulations, the discharge permit application, and the recent self-monitoring data.

III. Limitations and Conditions

The effluent limitations of the draft permit, the monitoring requirements, and any implementation schedule (if required), may be found on the following pages of the draft permit:

Effluent Limitations:	Page 2-3 of 25
Monitoring Requirements:	Pages 8-10 of 25

IV. Receiving Water

The receiving water for this discharge is the Black River, a designated Warm Water Fish Habitat during the period of June 1 through September 30; the river is designated a Cold Water Fish Habitat for the period of October 1 through May 31. At the point of discharge, the river has a contributing drainage area of 190 square miles. The summer 7Q10 flow of the river is estimated to be 21.15 cubic feet per second (CFS) and the summer Low Median Monthly flow is estimated to be 59.53 CFS. The instream waste concentration at the summer 7Q10 flow is 0.149 (14.9%) and the instream waste concentration at the summer Low Median Monthly flow is 0.059 (5.9%).

V. Facility History and Background

The Town of Springfield owns and operates the Springfield WWTF, which is an activated sludge treatment system. The facility was upgraded in 2005, and consists of two primary clarifiers, four biological reactors and two secondary clarifiers. The flow from the secondary clarifiers is disinfected with UV and discharged to the Black River, a tributary of the Connecticut River.

VI. Permit Basis and Explanation of Effluent Limitation Derivation

Flow – The draft permit maintains the annual average flow limitation of 2.2 MGD. Following the completion of the Combined Sewer Overflow (CSO) abatement project, the flow limit shall be increased to 2.4 MGD, which is the design capacity of the upgraded facility.

Biochemical Oxygen Demand (BOD_5) – The effluent limitations for BOD_5 remain unchanged from the current permit. The monthly average (30 mg/L) and weekly average (45 mg/L) reflect the minimum level of effluent quality specified for secondary treatment in 40 CFR Part 133.102. In addition, the draft permit contains a 50 mg/L, maximum day, BOD_5 limitation. This is the Agency standard applied to all such discharges pursuant to 13.4 c. of the Vermont Water Pollution Control Permit Regulations. The Agency implements the limit to supplement the federal technology based limitations to prevent a gross one-day permit effluent violation to be offset by multiple weekly and monthly sampling events which would enable a discharger to comply with the weekly average and monthly average permit limitations. Mass limits (113 lbs/day, monthly average and 169 lbs/day, weekly average) are derived by multiplying the concentration limits by the permitted flow of 2.2 MGD. When the Permittee completes the CSO abatement project, and is

permitted a flow increase to 2.4 MGD, the mass limits will remain unchanged. The BOD_5 weekly monitoring requirement is unchanged from the current permit.

Total Suspended Solids (TSS) – The effluent limitations for TSS remain unchanged from the current permit. The monthly average (30 mg/L) and weekly average (45 mg/L) reflect the minimum level of effluent quality specified for secondary treatment in 40 CFR Part 133.102. In addition, the draft permit contains a 50 mg/L, maximum day, TSS limitation. This is the Agency standard applied to all such discharges pursuant to 13.4 c. of the Vermont Water Pollution Control Permit Regulations. The Agency implements the limit to supplement the federal technology based limitations to prevent a gross one-day permit effluent violation to be offset by multiple weekly and monthly sampling events which would enable a discharger to comply with the weekly average and monthly average permit limitations. Mass limits (113 lbs/day, monthly and 169 lbs/day, weekly average) are derived by multiplying the concentration limits by the permitted flow of 2.2 MGD. When the Permittee completes the CSO abatement project and is permitted a flow increase to 2.4 MGD, the mass limits will remain unchanged. The TSS weekly monitoring requirement is unchanged from the current permit.

Total Phosphorus (TP) – The limitation of 16 lbs per day, monthly average, and weekly monitoring from May 1 through October 31 remain unchanged from the current permit. This limit was established in recognition of the Springfield WWTF being a significant contributor to the nutrient enrichment in the Black River (impaired, 2000 303(d)). After establishment of this limit, the receiving water was removed from the 303(d) list as it meets Vermont Water Quality Standards.

The Permittee shall monitor the discharge for TP twice per month from November through April to be consistent with WWTF of similar size in Vermont.

The Agency recognizes that the biological assessments conducted since 2002 have consistently met or significantly exceeded Class B standards for aquatic biota and aquatic habitat uses for Warm Water Medium Gradient stream type. However, the projected increase in downstream TP concentration attributable to the facility operating at design (i.e., permitted) flow with an effluent concentration of 0.8 mg/L under low monthly median flow conditions is 0.047 mg/L (47 μg/L), a load that could potentially contribute excessive instream phosphorus concentrations. Therefore, per Section II.B.4 of the permit, the Agency reserves the right to modify this permit during its term for cause including a change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge.

Total Nitrogen (TN) – On November 10, 2011, a letter from the EPA (Region I) to the Agency indicated that Vermont must establish TN limitations in permits such that the TN load from all facilities in the Connecticut River watershed is consistent with the requirements of the Long Island Sound Total Maximum Daily Load (TMDL).

Section I.B in this draft permit requires the Permittee have a qualified consultant develop and submit a Nitrogen Removal Optimization Plan by March 31, 2016. The plan shall be provided to the Agency before implementation. Beginning with the data collected in January 2016, an annual report will be due to the Agency documenting the pounds of TN discharged as well as removal optimization and efficiencies. In addition, this Condition contains as clause that allows the Agency to reopen the permit to include a wasteload allocation for this facility based on the LIS TMDL.

TN is a calculated value based on Total Kjeldahl Nitrogen (TKN) and Nitrate/Nitrite (NO_x) Nitrogen. The sum of TKN and NO_x shall be used to derive TN. Weekly monitoring will be required for TKN and NO_x during the months of May through October; twice monthly monitoring will be required during the months of November through April.

Settleable Solids – The limitation of 1.0 mL/L instantaneous maximum and daily monitoring remain unchanged from the current permit. This numeric limit was established in support of the narrative standard in Section 3-01 B.5 of the Vermont Water Quality Standards.

Escherichia coli – The *E. coli* limitation and monitoring requirements are unchanged from the previous permit. A mixing zone of 200 feet downstream from the discharge point (the effluent weir of the UV disinfection structure) was established for *E. coli* when the facility was upgraded and UV disinfection installed. The Agency determined that a discharge limit of 160 colonies/100 mL would be sufficiently diluted by the receiving water to consistently achieve the 77 colonies/100 mL *E. coli* water quality standard at the end of the mixing zone. Monitoring is required weekly.

Seasonal disinfection, meaning the required use of chlorine or another disinfection method to kill effluent bacteria between April 1 and October 31 only, is authorized for this discharge, per agreement with the Vermont Department of Health. As a result, the *E. coli* monitoring and effluent limitation do not apply for the period of November 1 through March 31.

pH – The pH limitation remains at 6.5 - 8.5 Standard Units as specified in Section 3-01 B.9. in the Vermont Water Quality Standards. Monitoring remains at daily.

Special Conditions
Special Condition I.A.10 addresses septage capacity. The draft permit retains the requirement that Permittee shall reserve 9,600 GPD and its equivalent BOD organic capacity for septage receiving.

Special Condition I.A.12 requires that certain spare parts be available for the secondary clarifier. The Agency believes that this provision is necessary since an adequate level of redundancy (i.e., a fourth clarifier) could not be included in the 2005 upgrade due to space limitations at the site. These spare parts must be available at all times.

Waste Management Zone (WMZ) – As defined under 10 V.S.A. §1251(16), a WMZ is "a specific reach of Class B waters designated by a permit to accept the discharge of properly treated wastes that prior to treatment contained organisms pathogenic to human beings. Throughout the receiving waters, water quality criteria must be achieved but increased health risks exist due to the authorized discharge".

On the basis of the Agency's WMZ Length Determination Model, a WMZ in the Black River extending 3.1 miles downstream from the Springfield WWTF outfall was deemed appropriate. The current permit maintained a WMZ of 9.0 miles due to the possibility of the construction of two CSO treatment facilities within that 9 mile WMZ. These treatment facilities will not be constructed, and this additional length of WMZ is now known to be unnecessary. The draft permit reverts to the 3.1 mile WMZ downstream of the outfall in the Black River

Toxicity Testing – 40 CFR Part 122.44(d)(1) and 122.21(j) require the Agency to assess whether the discharge causes, or has the reasonable potential to cause or contribute to an excursion above any narrative or numeric water quality criteria. Per these federal requirements, the Permittee shall conduct WET testing and toxic pollutant analyses according to the schedule outlined in Section I.G of the draft permit.

If the results of these tests indicate a reasonable potential to cause an instream toxic impact, the Agency may require additional WET testing, establish a WET limit, or require a Toxicity Reduction Evaluation.

Monitoring and Reporting – For all facilities with a design flow of greater than 0.1 MGD, 40 CFR § 122.21(j) requires the submittal of effluent monitoring data for those parameters identified in Section I.H.3 of the draft permit. Samples must be collected once annually such that by the end of the term of the permit, all quarters have been sampled at least once, and the results will be submitted by December 31 of each year.

Combined Sewer Overflows (CSOs) – Discharges from combined storm and sanitary sewers do not meet the requirements of the Vermont Water Quality Standards. The Town of Springfield was issued 1272 Orders in 1989 and 1993 to assess the locations of potential CSOs. Reports detailing the assessment and recommended corrective actions were submitted as required. A 1272 Order was issued in 1994, outlining a 5-year CSO abatement plan; due to funding constraints, this timeline was revised in 1996 to lengthen the schedule to 10 years. A 1272 Order was issued in 2001 to disconnect the J&L #1 building and Bryant building roofdrains from the Town's sewer system.

To date, 16 of the 30 identified CSO locations have been eliminated, the roofdrains of the J&L building #2 have been disconnected from the combined sewer, and the roofdrains of the Bryant building have been plugged to prevent roof drainage from entering the combined sewer system. The remaining CSO locations are listed in Attachment B of the permit. A 1272 Order is being issued concurrently with this permit with a compliance schedule to complete the CSO abatement project such that these overflow locations conform to the Vermont's 1990 CSO Control Policy.

Additionally, the technology-based Minimum Controls established in the U.S. EPA's 1994 Combined Sewer Overflow Control Policy are included in Section I.I of the draft permit (note that the Minimum Control of the "review and modification of pretreatment requirements to assure CSO impacts are minimized" has been omitted because the administration of the federal pretreatment program is not the responsibility of individual Vermont municipalities since it was delegated to the State of Vermont, Agency of Natural Resources in 1982).

Operation, Management, and Emergency Response Plans – As required by the revisions to 10 V.S.A. Section 1278, promulgated in the 2006 legislative session, Section I.J has been included in the draft permit. This condition requires that the Permittee implement the Operation, Management and Emergency Response Plans for the WWTF, sewage pump/ejector stations, and stream crossings as approved by the Agency on June 16, 2009; and for the collection system as approved by the Agency on September 30, 2010.

Electric Power Failure – Within 30 days of the effective date of the permit, the Permittee must submit to the Agency updated documentation addressing how the discharge will be handled in the

event of an electric power outage. The effluent must receive a minimum of primary treatment (or in the case of ultraviolet light disinfection systems, not less than secondary treatment) plus disinfection.

VII. Procedures for Formulation of Final Determinations

*The public comment period for receiving comments on the draft permit was from **September 14 through October 15, 2015.** The Agency received no comments from the public concerning the draft permit.*

1272 ORDER No. 3-1154

IN THE MATTER OF: **Town of Springfield**
96 Main Street
Springfield, Vermont 05156

In accordance with the provisions of 10 V.S.A. §1272, the Secretary (Secretary) of the Vermont Agency of Natural Resources (Agency) makes the following:

Findings of Fact

1. The Town of Springfield (Springfield) owns and operates a combined sewage collection system which collects both sanitary sewage and stormwater runoff.

2. During storm events, overflows containing untreated sanitary sewage can enter the Black River from several locations within the sewer system (see Attachment A). These overflows constitute public health and environmental hazards. Based information available to the Agency, these overflows occur during certain storm events but do not occur during dry weather conditions.

3. Overflows from combined storm and sanitary sewers must conform to Vermont's 1990 Combined Sewer Overflow Control Policy and U.S. EPA's 1994 Combined Sewer Overflow Control Policy.

4. In 1993, Springfield identified 28 overflow locations in the "Report on Springfield CSO Abatement, Basis of Design": 24 combined sewer overflow (CSO) locations and 4 emergency overflow locations adjacent to pumping stations (Attachment A). Two additional overflow locations (CSO #031 and 100, Attachment A) were identified during abatement work. Additionally, Springfield identified substantial contributors to CSO events: the impervious surfaces of streets and parking lots, as well as the roof drains of three major buildings (the Bryant building and two Jones and Lamson (J&L) buildings) with a total roof area of approximately 9.4 acres.

5. Over approximately the past 20 years, under previous 1272 Orders, Springfield has eliminated 16 CSO locations, disconnected the roof drains of J&L #2 from the combined sewer system, and installed a pneumatic plug at the Bryant building to prevent roof drainage from entering the combined sewer system. Springfield has implemented a long-term strategy and multi-pronged approach to abate its CSOs and documented this progress in a report submitted to the Agency entitled, "Combined Sewer Overflow Abatement Effective Monitoring Study" (December 2012).

6. On June 12, 2015, the Agency and Springfield met to discuss the current status of Springfield's CSO abatement project.

7. At that meeting, Springfield indicated plans to eliminate nine of the 14 remaining CSO locations (CSO # 005, 007, 008, 009, 011, 013, 018, 020, and 100), and plug the pipes that drain the roof of the J&L #1 building into the combined sewer system which will significantly reduce the frequency and magnitude of the CSO events at CSO #004.

8. Without the implementation of the methods and procedures set forth in this Order, it can reasonably be expected that the overflows of untreated sanitary sewage from Springfield's CSO locations will create or cause a discharge to waters of the State in violation of 10 VSA Chapter 47, the Vermont Water Quality Standards (Section 3-04(B)(3)), and Discharge Permit No. 3-1154.

ORDER

WHEREFORE, the Secretary issues the following Order, under the authority of 10 V.S.A. § 1272, to establish methods and procedures to eliminate or control the discharges from the CSOs listed in Attachment A:

A. By no later than December 31, 2018, Springfield shall:

i. Physically eliminate the following nine CSO #s: 005, 007, 008, 009, 011, 013, 018, 020, and 100. Springfield shall submit written confirmation to the Agency within five business days of the elimination of each CSO location.

ii. Disconnect the J&L #1 roof drains from the combined sewer system; this will significantly reduce the frequency and magnitude of CSO events at CSO #004. Springfield shall submit written confirmation to the Agency within five business days of the disconnection of the roof drains.

B. Springfield shall immediately implement the following "Minimum Controls" in conformance with the EPA document "Combined Sewer Overflows, Guidance for Nine Minimum Controls" (1995):

i. Implementation of proper operation and regular maintenance programs for the sewer system and the combined sewer overflow such as routine catch-basin, sewer, and interceptor cleaning;

ii. Maximizing the use of the collection system for storage;

iii. Maximizing wet-weather flow to the wastewater treatment facility;

iv. Elimination of any discharge from combined sewer overflow during dry weather;

v. Control of solid and floatable material in the combined sewer overflow;

vi. Pollution prevention programs such as litter control and street sweeping to reduce the contaminants in the combined sewer overflow discharge;

vii. Implementation of a public notification process to ensure that the public receives adequate notification of when and where a combined sewer overflow discharge occurs; and

viii. Monitoring to characterize the impacts of the combined sewer overflow discharge and to determine the effectiveness of these controls.

C. Springfield shall submit two progress reports to the Agency on both the status of the CSO abatement project and Springfield's compliance with the "Minimum Controls". One progress report shall be due on **December 31, 2016** and shall document Springfield's progress between the date of issuance of this Order and December 2016. The second progress report shall be due on **December 31, 2017** and shall document Springfield's progress between December 2016 and December 2017. At a minimum, the progress reports shall contain the following:

i. A description of the progress made towards achieving compliance with the December 31, 2018 date for completion of the CSO abatement project, including a summary of the work done and the CSO locations eliminated or reduced.

ii. An assessment of whether Springfield is on schedule in its effort to comply with the December 31, 2018 date for completing the CSO abatement project.

iii. If Springfield is not on schedule to comply with the December 31, 2018 compliance date, an explanation of why and a detailed description of the steps Springfield intends to take to meet the December 31, 2018 compliance date.

iv. A description of how Springfield is implementing the "Minimum Controls", and if any Minimum Control is not being implemented, an explanation of why and how Springfield plans to implement the Minimum Control going forward.

D. **By no later than December 31, 2020**, Springfield shall complete and submit a report to the Agency detailing the effectiveness of the CSO abatement project. This report shall identify the remaining CSO locations within the collection system and assess their compliance with Vermont's 1990 Combined Sewer Overflow Control Policy, or the most current amendment to the Policy.

E. The documentation required by Conditions A, B and C above shall be submitted to:

Agency of Natural Resources
Department of Environmental Conservation
Watershed Management Division
1 National Life Drive, Main Building, 2nd Floor
Montpelier, VT 05620-3522

F. **By no later than December 31, 2015**, Springfield shall physically establish and maintain precipitation recording stations where adequate precipitation gauges do not already exist; these stations shall be located to record depth of precipitation specific to the sewer system collection drainage area of each of the 14 remaining CSO outfalls. The network may consist of both new and existing stations, but must be designed in such a manner as to provide unique precipitation amounts specific to individual CSO subcatchments. Such a network does not necessarily demand a gauge in each watershed, as three gauges spaced equally around a given watershed with the application of appropriate spatial interpolation techniques may provide a better representation of precipitation than a single gauge within its boundaries. Publicly available gauge data may also be of use. Precipitation measurements shall be of liquid depth to the nearest 0.01 inches, continuous at a five minute interval over the duration of flow monitoring and indexed to time and date. Care should be taken to minimize impacts of wind and surrounding trees/buildings that may hinder the catch efficiency of the rain gauge

G. Springfield shall immediately begin using the Agency's on-line CSO event reporting system to report CSO events in Springfield within 24 hours of the occurrence of the event. If for any reason the on-line system is not operable, Springfield shall provide notice to the Agency via phone or email within 24 hours of the occurrence of the event.

H. Springfield shall immediately post on-site signage identifying each CSO location, upon receipt of such signage from the Agency. Springfield shall regularly inspect and maintain the signage, and replace the signage if it is destroyed, removed, or no longer readable.

I. Within six months of the issuance of this Order, Springfield shall submit to the Agency a report on the feasibility and associated cost of installing a flow metering system for each CSO location in Springfield.

J. The Agency reserves the right to amend this Order at any time as necessary to protect water quality and comply with the requirements of Discharge Permit No. 3-1154 and the Vermont's 1990 Combined Sewer Overflow Control Policy and any amendments of such Policy.

K. The State of Vermont and the Agency reserve continuing jurisdiction to ensure future compliance with all statutes, rules, and regulations applicable to the facts and violations set forth above.

L. Nothing in this Order shall be construed as having relieved, modified, or in any manner affected Springfield's on-going obligation to comply with all other federal, state, or local statutes applicable to Springfield nor does it relieve Springfield of the obligation to obtain all necessary federal, state, and local permits.

M. The Agency, in issuing this Order, accepts no legal responsibility for any damage, direct or indirect of whatever nature and by whoever suffered arising out of the activities described.

N. This Order is not a resolution of any enforcement action that may be pending, contemplated, or initiated in this matter.

O. Pursuant to 10 V.S.A. Chapter 220, any appeal of this Order must be filed with the clerk of the Environmental Division of the Supreme Court within 30 days of the date of this Order. For further information, see the Vermont Rules for Environmental Court Proceedings, available online at www.vermontjudiciary.org. The address of the Environmental Court is Vermont Superior Court, Environmental Division, 32 Cherry Street, 2nd Floor, Suite 303, Burlington, VT 05401 (Tel # (802) 951-1740). The filing of an appeal does not stay this Order. The Notice of Appeal must specify the parties taking the appeal and the statutory provisions under which each party claims party status; must state the act or decision appealed from; must name the Environmental Division; and must be signed by the appellant or their attorney. In addition, the appeal must give the address or location and description of the property, project, or facility which the appeal is concerned and the name of the applicant or any permit involved in the appeal. The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings.

P. This Order does not grant any exclusive rights or privileges, which would impair any rights possessed by other riparian or littoral owners of the State of Vermont. It does not grant any right, title, or easement to or over any land not owned in fee by Springfield, nor does it authorize any damage to private property or invasion of private rights or the violation of federal, state or local laws or regulations.

Q. Springfield shall allow access to Agency representatives, upon the presentation of proper credentials, to inspect the subject site and sample any discharge or receiving waters as necessary to assess compliance with this Order and applicable state laws related to water quality.

R. This Order shall be effective upon the date of signing and shall remain in effect until such time as the activities governed under this Order are completed or until such time as the Agency rescinds this Order or issues a subsequent Order, whichever occurs first.

Alyssa B. Schuren, Commissioner
Department of Environmental Conservation

By:

Peter LaFlamme, Director
Watershed Management Division

ATTACHMENT A

S/N 002: CSO # 003
Location: Pump Station #1 / Clinton Street
Receiving Water: Black River

S/N 003: CSO # 004
Location: Behind J&L building #1
Receiving Water: Black River

S/N 004: CSO # 005
Location: Downstream of Bridge Street siphon
Receiving Water: Black River

S/N 005: CSO # 006
Location: Upstream of Bridge Street siphon **ELIMINATED**
Receiving Water: Black River

S/N 006: CSO # 007
Location: Behind Fire Station
Receiving Water: Black River

S/N 007: CSO # 008
Location: Clinton & Love Street
Receiving Water: Black River

S/N 008: CSO # 009
Location: Clinton Street at Land Rover
Receiving Water: Black River

S/N 009: CSO # 010
Location: Wall Street **ELIMINATED**
Receiving Water: Black River

S/N 010: CSO # 011
Location: Community Center Bridge
Receiving Water: Black River

S/N 011: CSO # 012
Location: Mineral Street
Receiving Water: Black River

S/N 012: CSO # 013
Location: Park Street Bridge
Receiving Water: Black River

S/N 013: CSO # 014
Location: River Street & N Main Street **ELIMINATED**
Receiving Water: Black River

	CSO # 015	
Location:	Pump Station #2 / Pearl Street	**ELIMINATED**
Receiving Water:	Black River	
S/N 014:	CSO # 016	
Location:	River Street (at paint store)	**ELIMINATED**
Receiving Water:	Black River	
S/N 015:	CSO # 017	
Location:	Fellows Co. parking lot	**ELIMINATED**
Receiving Water:	Black River	
S/N 016:	CSO # 018	
Location:	Lewis Street & Pine Street	
Receiving Water:	Black River	
	CSO # 019	
Location:	Pump Station #3 / Pearl Street	**ELIMINATED**
Receiving Water:	Black River	
S/N 017:	CSO # 020	
Location:	Riverside upstream siphon	
Receiving Water:	Black River	
	CSO # 022	
Location:	Pleasant Street	**ELIMINATED**
Receiving Water:	Black River	
	CSO # 023	
Location:	N Springfield upstream siphon	**ELIMINATED**
Receiving Water:	Black River	
	CSO # 024	
Location:	Pump Station #6 / Midway	
Receiving Water:	Black River	
S/N 018:	CSO # 025	
Location:	Bridge Street (upstream)	**ELIMINATED**
Receiving Water:	Black River	
S/N 019:	CSO # 026	
Location:	Bridge Street (downstream)	**ELIMINATED**
Receiving Water:	Black River	
	CSO # 027	
Location:	near Pump Station #1	**ELIMINATED**
Receiving Water:	Black River	
S/N 020:	CSO # 028	**PNEUMATIC PLUG PREVENTS**
Location:	Bryant building north lot	**ROOF DRAINAGE FROM**
Receiving Water:	Black River	**ENTERING SEWER SYSTEM**

S/N 021:	CSO # 029	
Location:	Wall Street	**ELIMINATED**
Receiving Water:	Black River	
S/N 022:	CSO # 030	
Location:	Union Street	**ELIMINATED**
Receiving Water:	Black River	
S/N 023:	CSO # 021	
Location:	Grand Union near Pump Station #4	**ELIMINATED**
Receiving Water:	Black River	
S/N 024:	CSO # 031	
Location:	Lower Park Street	**ELIMINATED**
Receiving Water:	Black River	
	CSO # 100	
Location:	Olive Street	
Receiving Water:	Black River	