

RESPONSE TO PUBLIC COMMENTS
Rockland Wastewater Treatment Plant
NPDES No. MA0101923

On June 9, 2005, the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) released for public notice and comment a draft National Pollutant Discharge Elimination System (NPDES) permit developed pursuant to an application from the Rockland Board of Sewer Commissioners for the reissuance of a permit to discharge treated municipal wastewater to the French Stream via Outfall 001 with a design flow of 2.5 million gallons per day. The public comment period for this draft permit expired on July 8, 2005. Comments were received from the North and South Rivers Watershed Association (NSRWA), the Town of Rockland, and the Riverways Program-Massachusetts Department of Fish and Game.

After a review of the comments, EPA has made a final decision to issue the permit authorizing this discharge. The following response to comments describes the changes that have been made to the permit from the draft and briefly describes and responds to the comments on the draft permit. Clarifications which EPA considers necessary are also included below. The comment letters are part of the administrative record and they may be paraphrased herein. A copy of the final permit may be obtained by writing or by calling Doug Corb, EPA Massachusetts Municipal NPDES Permits Program (CMP), 1 Congress Street, Suite 1100, Boston, MA 02114-2023; telephone: (617) 918-1565.

Background Information

There were a number of comments submitted regarding high flow issues, including inflow/infiltration (I/I), plant operations, and plant bypasses. In order to expedite the response to those comments we have summarized the current situation at the facility and the expected measures to be taken by the facility to resolve these issues.

As described in the fact sheet, the facility has a long term average flow capacity of 2.5 MGD and a maximum daily flow capacity of 6.0. During wet weather, the facility has received daily flows of up to 12 MGD due to inflow and infiltration. The permittee has developed a high flow management plan which involves storing flow in off-line tankage and returning this flow for full secondary treatment after the high flow event. On two occasions during the past four and one half years, the quantity of flow has exceeded the storage capacity, resulting in the discharge of partially treated wastewater to the plant outfall, where it combined with fully treated effluent and was discharged. The current permit requires that this partially treated flow be sampled, but does not specifically authorize this discharge, which is therefore in violation of the permit. Although the high flow management plan developed by the permittee maximizes the currently available treatment and storage capacity, it is clearly an interim measure pending removal of significant quantities of I/I and /or increasing the flow capacity of the treatment facilities.

The facility is currently performing a comprehensive wastewater management plan (CWMP)

which will evaluate the current wastewater treatment facilities and propose upgrades and improvements necessary to correct current deficiencies, comply with the new permit limitations, and serve the future wastewater needs of the community. Among the issues which must be evaluated are I/I control, plant design flow, and upgraded treatment processes necessary to comply with the NPDES permit limits. The scope of work for the CWMP is attached.

The permit contains a five year compliance schedule for achieving the new total phosphorus and ammonia limits, and requires the submittal of annual progress reports describing the progress towards achieving those limits. The schedule was established with the understanding that the permittee would be preparing the CWMP, and would, within the CWMP not only address the need for improved phosphorus and ammonia removal, but would also evaluate and propose remedies to I/I related problems.

As the Agencies are informed of progress in completing and implementing the CWMP there may be a need to reopen the permit to establish new limitations and conditions based on the findings of the CWMP (e.g. if an increased design flow is proposed and approved), or to issue enforcement orders should it become apparent that the schedule is not being attained. Reopening and modifying the permit would include public notice and the opportunity for comment on any modified conditions.

The following (in italics) is from the Camp, Dresser, and McKee, Inc., August 31, 2004 Project Evaluation Form submitted to Department of Environmental Protection. The project received approval for funding.

The objectives for the Town of Rockland Comprehensive Wastewater Management Plan include the following:

- 1. Assess current conditions including an evaluation of existing wastewater treatment plant influent flows and loads by component (e.g. residential, commercial, industrial, and infiltration/inflow), existing water supply and demands, and an assessment of the condition and capacity of the existing wastewater treatment facility.*
- 2. Assess future conditions including population projections, wastewater flow and load projections and infiltration/inflow removal efficiencies. Estimate when the design capacity of the treatment facility will be reached and develop a program for reaching satisfactory treatment levels for submission to MassDEP and EPA.*
- 3. Identify and evaluate alternatives to manage existing and projections wastewater flows and loads including optimization of the existing collection and treatment facilities, upgrade and expansion of the existing wastewater treatment facility, water reuse, water conservation and development of an I/I bank.*
- 4. Perform detailed evaluation of the most feasible alternatives for wastewater management and develop a recommended plan.*

This report will provide a roadmap for the community to adequately address current and future wastewater needs in a timely fashion, while concurrently managing growth within the community.

North and South Rivers Watershed Association (NSRWA)

Comment 1

Flow/Dilution: The facility has a design flow of 2.5 MGD, and a peak design flow of 6 MGD. Actual peak flows have been noted as high as 12 MGD and average annual flows also are in excess of the facilities design flow. Monthly Discharge Monitoring Reports indicate that there is significant Infiltration and Inflow, which contributes to the plant exceeding its design flows. The draft discharge permit requires that an Infiltration and Inflow [I/I] plan be developed. We request that the new discharge permit require the I/I plan include a timeline with reasonable milestones for decreasing Infiltration and Inflow to 10%. Clearly, there is a need to address the I/I as partially treated sewage is being directed to the outfall during times of high flows.

Response 1

The EPA compliance program and the MassDEP facility inspectors are closely tracking Rockland's ongoing high flow and I/I reduction plans. Should additional compliance schedules become necessary, they will be issued in the form of an enforcement order.

The permittee has a high flow management plan which uses surplus tankage for storage and pump back to the headworks for full treatment during periods when the plant design flow is exceeded. There have been two occurrences of partially treated effluent being discharged from the Rockland WWTP between January of 2001 and August of 2005. These events were March 22, 2001 and March 28, 2005. There have been a total of 5 storage and pump back events during the same four and one half year period. These and all other storm flows have been captured and received full secondary treatment.

The two partially treated flow events received primary settling, secondary aeration (with minimal biomass) and secondary settling as well as disinfection, in the offline second stage activated sludge facilities. The high flow management plan requires additional effluent sampling during such events along with reporting to EPA and MassDEP within 24 hours.

Comment 2

BOD and TSS limits: The new discharge permit requires May 1 – September 30th BOD and TSS limits. The limits should be extended to include the entire growing season, April 1st through

October 31st.

Response 2

April and October are part of the growing season for benthic algae, they are not however, part of the critical low flow and high temperature period requiring more stringent BOD and TSS limits. The BOD and TSS seasonal limits shall remain unchanged.

Comment 3

Nutrients: The new phosphorus limit of 0.2 mg/l is an improvement however it is based on technology limits not on the carrying capacity of the stream itself. Because this stream is listed as impaired for nutrients a TMDL will be required. In order to assist in understanding what the true capacity of the stream is, we request that monitoring up and downstream of the point source be required as part of the permit in order to assist in collection of information that will be useful in determining the TMDL. In addition, total and soluble nitrogen and dissolved oxygen should be assessed instream, both upstream and downstream of the outfall to aid in determining the effluent impact on eutrophication within the stream.

We request that this instream monitoring be added to the permit. As with the BOD and TSS limits, we request that the 0.2 mg/L seasonal limits for phosphorus, ammonia, and dissolved oxygen be extended to include the entire growing season from April through October.

Response 3

We expect to reevaluate the phosphorus limits during the term of this permit, in light of expected new numeric criteria for phosphorus/eutrophication to determine if a more stringent water quality based limit is necessary. While no TMDL is currently scheduled, 2006 is the year for MassDEP to monitor water quality in the South Coastal Basin. If during the term of the permit additional in-stream water quality data is needed from the permittee, it may be required under section 308 of the Clean Water Act.

We have extended the period in which the 0.2 mg/l phosphorus limit applies to include the growing season months of April and October. Phosphorus uptake during the growing season can result in phosphorus being retained in the system and contribute to eutrophic conditions during the more critical low flow high temperature period.

As phosphorus is expected to be the most limiting nutrient relative to eutrophication, we have not included nitrogen sampling. This issue is discussed further in the response to comment number 13.

Comment 4

Copper: This facility has had elevated copper concentrations in its effluent and has been under an Administrative Consent Order since March of 2002. The draft discharge permit has established new copper limitations for this discharge. Copper can be toxic to aquatic organisms in relatively low concentrations. We would ask that there be an assessment of the feasibility of reducing copper from the influent water. The most common cause of copper in wastewater is due to the pH of drinking water corroding copper pipes in homes. If the pH can be adjusted at the source, there will be less risk of elevated copper concentrations in the wastewater stream.

Response 4

Drinking water supply system pH and corrosion control inhibitors were evaluated as a requirement of the current copper reduction Administrative Order (AO) No. 02-10 issued by EPA on March 28, 2002. The drinking water is currently treated to control pH. Based on the required evaluation, the use of other corrosion control chemicals was deemed not practical.

Discharge Monitoring Report (DMR) data for the period of September 1, 2002 through August 31, 2004, demonstrate effluent concentrations below the interim copper limits of 13.2 ug/l (average monthly) and 18.7 ug/l (maximum daily) found in the 2002 EPA Administrative Order (AO) and the corrected limits for total copper found in the draft permit, 12 ug/l (average monthly) and 19 ug/l (maximum daily). See the Fact Sheet Attachment A. Based on a review of current DMR data, the permittee appears to be able to meet the new water quality criteria based limits for total copper.

The Town of Rockland

Comment 5

The Town of Rockland would like to express a concern regarding section C. UNAUTHORIZED DISCHARGES. The current permit provides for auxiliary pumping when the flow exceeds the design peak for more than three hours (Footnote # 6). The Town would like you to consider adding this to the current Draft permit. Please be advised that auxiliary pumping is only used during high flow events.

We have established a High Flow Management Plan which has been reviewed both by the EPA and MassDEP. Our High Flow Plan was recently witnessed by Dan Granz of your office and Dave Burns of the MassDEP and both agreed that it was the most advantageous way to maintain the plant's biomass, and prevent major backups in the sanitary collection system. Failure to allow for auxiliary pumping could result in major health hazards for the residents of

Rockland.

Response 5

The diversion of a portion of the wet weather influent flow to the surplus tankage, which is later returned to the head works for full treatment, is an acceptable practice that is allowed in the final permit. Flow in excess of the plant's treatment capacity which does not receive full secondary treatment is not a permissible bypass under 40 CFR §122.41(m) and may not be reflected in the permit conditions.

However, until such time as there are improvements and repairs to the collection system to reduce infiltration and inflow eliminate all bypasses, interim relief from bypass violations may be granted in the form of interim conditions placed in an enforcement action.

The Riverways Programs, MA Department of Fish and Game

Comment 6

The Fact Sheet states the facility has a maximum peak design flow of 12 MGD but recent actual maximum daily flows were not listed. The addition of a report requirement for maximum daily flow is a welcome addition and this information will contribute important information about the flow patterns and capacity of the plant. This information, hopefully, will be made available on the on-line PCS database in the future.

Response 6

The fact sheet states that the design flow is 2.5 MGD with peak flows of 12 MGD. The 12 MGD peak flow is an actual flow rate, not a design flow rate.

The current permit does not require that the maximum daily flow rate be reported. The final permit requires that the annual average, monthly average and maximum daily flow be reported each month, and this data will be available on-line.

Comment 7

The Fact Sheet also indicates this facility has experienced average annual daily flows in excess of design capacity and the plant also has the capability to bypass some of the treatment process during high flow events. The Permittee should be required to provide detailed reports concerning any bypassing including information on the volume of effluent bypassed and the length of time flows were bypassed. This information should be made readily available to the public just as other permit reporting requirements are available on the [Permit Compliance System] PCS database. This is important information to know when considering the affect the effluent could have on French Stream.

Response 7

Such information is provided to both the EPA and MassDEP under the bypass reporting requirements in 40 CFR §122.41(m). Because bypasses from sanitary sewers may not be authorized as a permit condition, they are not tracked in PCS. The reports to the agencies are a matter of public record and are available for review during EPA's regular business hours.

Comment 8

Just as important a need concerning bypass events is an increase in monitoring and testing during the bypass event. With monitoring set to 2/week for pollutants such as BOD, ammonia, and TSS and even less frequently for phosphorus, copper and aluminum, and Whole Effluent Toxicity in the permit and set standards about when and where the sampling should occur; it is quite probable that the blended sewage will not be tested for these pollutants of concern during most if any of the bypass events. While bypasses are not permitted it appears they do occur and the permit should not overlook this reality. We strongly urge requirements for increased monitoring during bypass events that will capture information about the pollutant loads and concentrations in the partially treated effluent for all pollutant parameters. Given the capacity of the plant for peak flows, the flow triggering a bypass event must be quite significant. Even if the concentrations of pollutants in the effluent are within limitations the loads could be orders of magnitude above loads at design flow and this information should be gathered.

Response 8

There have been only two bypass events, both during high flow periods in March (see response 1). The High Flow Management Plan calls for additional BOD and TSS sampling during bypass events.

Comment 9

The addition of phosphorus concentration limits that begin to reflect EPA Ambient Water Quality Criteria for Ecoregion XIV is an important step to addressing the nutrient impairment of the receiving waters in the absence of specific State nutrient criteria or a TMDL for the French Stream.

It seems unlikely the seasonal concentration of phosphorus assigned will allow French Stream to meet Gold Book guidance given the nominal dilution of the effluent in the stream though the reduction in allowable phosphorus concentration in the effluent is a good start toward reducing impacts to the system from nutrients. However concentration limits may not be sufficient limitations for the Rockland discharge. The plant's annual monthly average flow exceeded the design flow of 2.5 MGD during 2003 and there are many months with averaged flows well above design flow. This information suggests setting concentration limits for phosphorus will not be sufficient and a load limit is also needed to be more protective of this impaired waterway.

The problem is well illustrated by the flows recorded during April of 2004 when the average flow was 4.0 MGD. At 4.0 MGD the load of phosphorus, at the allowed seasonal concentration, would be 33 lbs or nearly 40% greater than the load at 2.5 MGD at this same concentration. This is a significant increase in phosphorus, during the growing season, to an effluent dominated waterway that is listed as impaired due to organic enrichment and nutrients.

We strongly encourage load limits, for both seasonal limits, in the permit to compensate for the higher flows the discharge monitoring data show to be a frequent occurrence.

Response 9

As you note, the facility has exceeded its design flow. The final permit includes an annual average flow limitation of 2.5 MGD, meaning that I/I must be reduced in order to achieve this limit, which will be done pursuant to the compliance schedule.

Also, you are correct in pointing out that the phosphorus limits in the permit may not ultimately be stringent enough to achieve Massachusetts water quality standards. This was stated in the fact sheet, but it was decided that in the absence of numerical criteria, a TMDL, or recent water quality information, that the state's technology-based "highest and best" treatment limit would be applied. This limit is expressed as a monthly average concentration limit, not as a mass limit, so mass limits will not be included in the final permit. Mass reporting requirements will be included however, so that this information will be readily available for any future water quality studies.

Also, as was stated in the response to comment number 3, we expect to re-visit the phosphorus limitation during the term of this permit.

Comment 10

The April high flows also raises another issue concerning the phosphorus limitations added to this permit. The seasonal, lower phosphorus concentration limit is invoked from May 1 through September 30. The Fact Sheet does not discuss how the beginning and end dates for these lower limits were determined. Recent draft permits, such those for the towns of Concord and Billerica, have seasonal phosphorus limits that begin on April 1st with an end date of October 31st. Given this is a coastal stream and likely to have weather some what tempered by its proximity to the coast that could result in an earlier start to the growing season, the small flows of the French Stream, and the known nutrient problem in the stream, was consideration given to having a the longer warm seasonal limitation such as assigned to the Concord and Billerica plants? We would strongly advocate for the longer summer seasonal concentration and load limitations for this facility.

Response 10

As discussed in the response to comment number 3, the 0.2 mg/l limitation for phosphorus, when final, will be in effect during the months of April and October.

Please note the addition of an April 1-October 31 average monthly interim total phosphorus limit of 1 mg/l, based on requirements found in the State Water Quality Certification, pursuant to Section 401 of the Clean Water Act.

Comment 11

The colder weather limitation requires the facility to measure total phosphorus once per week and places a monthly average concentration limit on the effluent. The usefulness of the colder weather monitoring of phosphorus would be enhanced if measurements were made to determine the partitioning of the total phosphorus so the percentage of total phosphorus that was made up of the dissolved fraction, which is predicted to pass-through the French Stream and North River systems, could be known. This information would be invaluable to the State when developing the nutrient TMDL for this waterway. Augmenting the permit with a requirement to measure soluble reactive phosphorus in addition to total phosphorus is suggested.

Response 11

We have included a weekly ortho-phosphorus monitoring requirement for the months of November through March. This is the same requirement included in the recent Assabet River permits.

Comment 12

This facility has had elevated concentrations of copper in its effluent and new copper limitations have been established for this discharge. As noted in the Fact Sheet, copper can be quite toxic to aquatic biota in low concentrations. Also note worthy is the stated impairment of French Stream by unknown toxicity which may be related to copper in the effluent. The new copper limits, based on the dilution of the facility, site specific data about the hardness of the receiving water and effluent and National standards will afford additional protection to the impaired receiving water. Because of longstanding issues with elevated copper, the facility has been operating under an Administrative Consent Order and interim limits. The Draft permit and Fact Sheet seem to indicate the new limits in the draft permit will become effective when this permit is finalized with no additional compliance schedule allowed to meet the new limits. The many years of interim limits and AO requiring the facility to address copper concentrations has been adequate and we support immediate implementation of the new draft permit limitations. We would further support increased sampling of copper above the once monthly schedule imposed by the draft permit. Given the past compliance record, the poor compliance with the whole effluent toxicity testing, (100% failure rate of NOEL and 75% failure rate for LC50 in 2003), and the impaired status of French Stream, an increase in monitoring would afford additional information about how well the facility is doing with regards to copper reduction and if there is a likelihood that the effluent poses a chronic toxicity threat or contributes to the observed unknown toxicity to the aquatic biota of French Stream and the problems with WET test compliance.

Response 12

The majority of the DMR data for total copper submitted by Rockland is below 10 ug/l. This is below both the interim limits and those found in the final permit. The effluent hardness averages 148 mg/l. Hard water greatly reduces the toxicity of copper.

Many municipal wastewater treatment plant effluents with higher effluent copper concentrations than those recorded by Rockland while exhibiting little whole effluent toxicity.

If Rockland continues to fail WET tests, a toxicity reduction evaluation will be necessary. The WET protocol requires concurrent copper and hardness sampling to allow correlation to be made between the copper toxicity and the WET results.

Comment 13

The ammonia monitoring is to be done twice a week with limitations that vary throughout the season. The Fact Sheet did not state whether the North River estuary or near coastal waters are nitrogen sensitive or impaired because of excess nutrient inputs. If the waters to which French Stream is tributary are nitrogen sensitive it would be helpful to have monitoring requirements for other nitrogen compounds in addition to ammonia- such as nitrate, TKN and total nitrogen. This information would help managers and regulators address nutrient loading to the estuary and near coastal waters. The ammonia sampling requires a 24 hour composite sampling. Is it known if ammonia is likely to convert into other nitrogen compounds during a 24 hour sampling? Given ammonia's relative instability, a 24 hour sampling protocol may not accurately reflect the ammonia concentrations in the effluent. Perhaps some limited number of interim sampling can be done to ascertain the validity of the 24 hour sampling.

Response 13

The discharge is approximately 12 river miles from the North River Estuary. The North River is on the Massachusetts 2002 Integrated List of Waters, Combined CWA Section 305(b), and 303(d) Report as well as the 2004 Proposed List, for pollutants requiring a TMDL for only pathogens. The North River is a well flushed system. If a nitrogen model is to be conducted for the watershed in the future, monitoring may be easily accomplished for the Rockland discharge. EPA currently has extensive data for nitrogen compounds discharged from similar treatment plants and does not see a benefit in collecting such data from Rockland now.

The sample preservation and holding time for ammonia is found in 40 CFR, Part 136.3 and Standard Methods for the Examination of Water and Wastewater, 20th Edition, Page 4-104. Ammonia samples may be held for up to 28 days without unacceptable degradation. A 24 hour composite sample should not pose a problem provided the automatic sampler is refrigerated as required in the testing protocol.

Comment 14

The facility is required to monitor dissolved oxygen concentrations. Given the impairment of French Stream for organic enrichment/low DO, a minimum DO concentration is logical. The concentration limit, while greater than the Massachusetts standard for Class B waters, is based on calculations from over 20 years ago as stated in the Fact Sheet. Has there been any instream DO monitoring upstream and downstream of the effluent discharge to determine if DO levels are adequate in the stream to meet Class B standards?

While the DO at the effluent cascade may be acceptable there is a possibility a combination of factors associated with the effluent water quality could result in a drop of dissolved oxygen once assimilated into the receiving water. Adding instream monitoring requirements would help determine if the effluent limitations imposed by the permit are adequately protecting the receiving water and would be a pro-active addition to the permit providing information about the organic enrichment/ low DO status of the river over time. The Instream DO monitoring could be limited to stressful time periods such as summer, low flow and early morning periods.

Response 14

Instream dissolved oxygen (DO) data collected for the draft South Coastal Water Quality Assessment Report was in the range of 5.4 mg/l to 7.4 mg/l downstream of the treatment plant discharge. The river DO saturation range was 62% to 86% . These samples do not include critical pre-dawn periods where the lowest diurnal DO concentrations are generally found in nutrient impacted streams. The upstream DO ranges were 6.1 mg/l to 8.9 mg/l with saturation between 72% and 91%. The upstream sample taken during both day time and early morning.

The Class B (warm water fishery) DO standards are 5 mg/l and 60% saturation.

The final permit includes a minimum effluent DO limit of 7.4 mg/l and a daily monitoring requirement. Instream monitoring has not been included; the existing sampling has not revealed any specific problem areas. Without identified problem areas, any instream monitoring would be somewhat arbitrary, and unlikely to produce valuable data. If, in the future, EPA or MassDEP need instream data to determine the impact of the discharge on receiving water quality, such information may be obtained through a Section 308 information request.

Comment 15

The Whole Effluent Toxicity Testing requirements call for quarterly testing on one species only. The facility has had some problems meeting WET requirements with particular problems in 2003, as noted above. The Fact Sheet did not include three of the test results for 2003's LC50 tests but the PCS database shows one test with 36.6 % (1/03) result and two other noncompliant tests. The NOEL results were even more problematic with two tests registering only 12.5% survival. The French Stream is impaired due to unknown toxicity; the WET tests provide important information about the suitability of the receiving water for aquatic life. Given the compliance history, one year of satisfactory WET testing does not seem to offer adequate insight into the potential toxicity of the effluent on a long term basis. The plant's own history shows this to be true. The 2002 WET compliance was satisfactory except for one failure of the NOEL with 2003 being the opposite with only one compliant test out of eight. Given the variability in the test results, requiring three or more years of satisfactory tests before the Permittee can petition for a reduction in WET testing seems appropriate.

Response 15

The permit language allowing the permittee to petition EPA for a reduction in whole effluent

toxicity testing after one year is standard to most municipal discharge permits issued by EPA in Massachusetts. The facility's compliance history, as well as the fact that only one species is utilized in WET testing will significantly raise the bar for EPA to grant such a request. The permittee will need to demonstrate that the source of the toxicity in the discharge has been identified and eliminated to receive a reduction in the WET requirements.

Comment 16

*The Permittee is required to test using daphnids. Has the Permittee ever tested using additional organisms such as the fathead minnow (*Pimephales promelas*)? How was daphnids determined to be the most sensitive species to use in the WET tests for this facility?*

Response 16

The NPDES permit issued on August 4, 1993 required whole effluent toxicity (WET) testing using two species, the fathead minnow and the daphnid, *Ceriodaphnia dubia*. The WET data submitted by the Town was reviewed prior to the August 4, 1999 permit reissuance, and the daphnid was identified as the more sensitive species at that time. EPA uses both the daphnids and fathead minnows in criteria development and has a broad data base showing daphnids being the more sensitive species for a wide range of pollutants common to POTWs.

Comment 17

The addition of infiltration and inflow assessment and reduction is particularly necessary addition to the permit given the I&I issues evident in the flow data provided. The facility had an annual average daily flow (2.7 MGD) in excess of design flow recently which is indicative of I&I problems. It is hoped the Permittee will make significant and timely inroads into their I&I problems. The draft permit does not establish any bench marks and milestones offering some specificity on how much progress the Permittee must make into I&I flows and a goal reduction in I&I. Defined progress points would be a welcome addition to this permit and could prevent more years of chronic flow limitation noncompliance in this wastewater dominated, impaired system. Given the occurrences of bypasses and the flow problems a sewer moratorium might also be warranted until some established percentage reduction in I&I is achieved.

Response 17

The permit requires the permittee to maintain an ongoing preventative maintenance program to prevent overflows and bypasses caused by malfunctions or failures of the sewer system infrastructure.

Also, within six months of the effective date of the permit, the permittee must submit to EPA and MassDEP an Infiltration/Inflow Control Plan. The plan 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 is to include an ongoing program to identify and remove sources of infiltration and inflow as well insure that the necessary level and the source(s) of funding are in place. The permit requires Rockland to conduct an inflow identification and control program that focuses on the disconnection and redirection of illegal sump pumps and roof down spouts.

Section 2.3 of the CDM Wastewater Facilities Plan (dated August 2004), Project Evaluation Form will address the feasibility of I/I removal and a program to monitor its effectiveness. This project was funded by the CWSRF on March 11, 2005.

See also response number 1.