

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
ONE CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023**

FACT SHEET

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

NPDES PERMIT NO: **MA0100285**

NAME AND ADDRESS OF APPLICANT:

**Cohasset Sewer Commission
41 Highland Avenue
Cohasset, MA 02025**

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

**Cohasset Wastewater Treatment Plant
43 Elm Street
Cohasset, MA 02025**

RECEIVING WATER: **Cohasset Cove/Harbor (South Coastal Basin – MA94-32/MA94-1)**

CLASSIFICATION: **Class SA – Shellfishing - Open**

I. PROPOSED ACTION

The above named applicant has applied to the U.S. Environmental Protection Agency for the re-issuance of its National Pollutant Discharge Elimination System (NPDES) permit to discharge into the designated receiving water. The current permit was both signed on and became effective October 17, 2000. A re-application was received by EPA on April 15, 2005. The permit expired on October 16, 2005 and has been since administratively continued.

II. DESCRIPTION OF DISCHARGE

Quantitative descriptions of the discharge in terms of significant effluent parameters based on recent discharge monitoring reports (DMRs) for March 2004 through March of 2007, may be found in **Fact Sheet Attachment A**. A Process Schematic Diagram may be found in **Fact Sheet Attachment B**, a Location Map may be found in **Fact Sheet Attachment C**, and **Attachment D** Summary of Essential Fish Habitat (EFH) .

III. LIMITATIONS AND CONDITIONS

The effluent limitations and monitoring requirements may be found in the draft NPDES permit.

IV. PERMIT BASIS AND EXPLANATION OF EFFLUENT LIMITATION DERIVATION

A. BACKGROUND

The Cohasset Wastewater Treatment Plant (WWTP) was originally built in 1979 as a 72,000 gallon perday (gpd) facility serving approximately 200 connections. From 1998 to 2001 the number of connections increased to about 1,100 with the expansion of the Central Cohasset Sewer System. A project upgrading and expanding the WWTP to a 300,000 gpd membrane filtration advanced secondary facility was completed in October 2000.

The treatment plant processes include potassium hydroxide addition for augmenting alkalinity, preliminary treatment consisting of bar screens and an aerated grit chamber, an anoxic tank for denitrification, activated sludge treatment in two aeration basins, filtration with modular membrane filter cassettes and an ultraviolet disinfection system. Effluent is discharged to Cohasset Cove through a three port diffuser. The grit and screenings are disposed of offsite. Waste sludge is removed for incineration at the Brockton Wastewater Treatment Plant. See Attachment C for a process schematic diagram.

The Town is currently operating under a Consent Agreement with the Commonwealth of Massachusetts to tie in the unsewered districts of Little Harbor (124,410 gpd), Atlantic Avenue (22,440 gpd), and Jerusalem Road (8,190 gpd). The districts to be sewerred have failing onsite septic systems which contribute to non-attainment of water quality standards in coastal watersheds. The order requires that the WWTP have sufficient capacity to treat the increased wastewater from the additional sewer connections. The Town has requested that the new NPDES permit allow the WWTP to expand to 450,000 gpd to accommodate the flow from the districts which will be sewerred.

B. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. Overview of Federal and State Regulations

Section 301(b)(1) of the Clean Water Act ("CWA") requires that publicly owned treatment works ("POTWs") achieve effluent limitations based upon Secondary Treatment by July 1, 1977. The secondary treatment requirements are set forth at 40 C.F.R. Part 133.102.

Section 301(b)(1)(C) of the CWA requires that effluent limitations based on water quality considerations be established for point source discharges when such limitations are necessary to meet state or federal water quality standards that are applicable to the designated receiving water.

Pursuant to 40 C.F.R. § 122.44 (d), permittees must achieve water quality standards established under Section 303 of the Clean Water Act (CWA), including state narrative criteria for water quality. Additionally, under 40 C.F.R. § 122.44 (d)(1)(i), "Limitations must control all pollutants or pollutant parameters which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any state water quality standard."

When determining whether a discharge causes, or has the reasonable potential to cause or contribute to an in-stream excursion above a narrative or numeric criterion, the permitting authority shall use procedures which account for existing controls on point and non-point sources of pollution, and where appropriate, consider the dilution of the effluent in the receiving water.

A permit may not be renewed, reissued, or modified with less stringent limitations or conditions than those contained in the previous permit unless in compliance with the anti-backsliding requirements of the CWA. EPA's anti-backsliding provisions restrict the relaxation of permit limits, standards, and conditions. Therefore, except under certain limited circumstances, effluent limits in the reissued permit must be at least as stringent as those of the previous permit. Effluent limits based on technology, water quality, and state certification requirements must meet antibacksliding provisions found under Section 402 (o) and 303 (d) of the CWA, and in 40 CFR 122.44 (1).

In accordance with regulations found at 40 CFR Section 131.12, MassDEP has developed and adopted a statewide antidegradation policy to maintain and protect existing water quality. The Massachusetts Antidegradation Policy is found at Title 314 CMR 4.04. No lowering of water quality is allowed, except in accordance with the antidegradation policy. All existing uses of the Cohasset Harbor must be protected.

2. Water Quality Standards and Designated Uses

The treatment plant discharges to Cohasset Cove, which is within Cohasset Harbor. The Massachusetts Surface Water Quality Standards (314 CMR 4.06 – Table 29) define Cohasset Cove and Cohasset Harbor as Class SA waters, open for shellfishing. *Class SA waters are designated as an excellent habitat for fish, other aquatic life, and wildlife, and for primary and secondary contact recreation. In approved areas they shall be suitable for shellfish harvesting without depuration (Open Shellfish Areas). These waters shall have excellent aesthetic value (314 CMR 4.05(4)(a)).*

Cohasset Cove is defined in MassDEP's South Shore Coastal Watersheds - 2001 Water Quality Assessment Report as Segment MA94-32, which includes waters south of a line drawn from the Bassing Beach jetty, Scituate westerly to the opposite shore, Cohasset excluding Baileys Creek and The Gulf. The total area of this segment is 0.09 square miles. The report also states that Cohasset Cove was formerly included as part of segment MA94-19--The Gulf.

The Massachusetts Year 2004 Integrated List of Waters (the 303(d) report) lists The Gulf as a Category 3 water, meaning that no uses were assessed due to insufficient data (Cohasset Cove is not listed as a receiving water segment in the 2004 list). The Proposed Massachusetts 2006 Integrated List of Waters lists Cohasset Cove as a Category 5 water, meaning that the water is impaired and requiring a TMDL for pathogens.

3. Antibacksliding/Antidegradation Analysis

As described previously, Section 402(o)(2)(A) of the CWA includes exceptions to the general prohibition to relaxing effluent limits. One of these exceptions is for alterations or additions to the permitted facility, provided that the relaxed limits are in accordance with effluent guidelines and water quality standards, including antidegradation (see Sections 402(o)(3) and 303(d)(4)(B)). The plant expansion from 0.3 mgd to 0.45 mgd is an alteration or addition to the permitted facility. MassDEP has provided EPA with the following Antidegradation Statement, which describes the proposed collection system and treatment plant expansion and provides an analysis of effluent limits and conditions necessary to ensure that the increased discharge from the discharge will achieve applicable water quality standards.

Town of Cohasset Wastewater Treatment Facility and Collection System Expansion Anti-Degradation Evaluation and Determination February 2007

The Town of Cohasset is in the process of expanding its collection system to sewer areas of the Town, which have failing septic systems and the resultant discharge of excessive nutrients and other contaminants into Little Harbor resulting in non-attainment of water quality goals in the receiving waters. Three areas will be sewered: Little Harbor {125,000 gpd}, Atlantic Avenue [22,000 gpd] and Jerusalem Road {8,000 gpd}. The Jerusalem Road area will be connected to the Town of Hull wastewater collection system. To accommodate the increased wastewater flows, the Town's wastewater treatment facility will increase its capacity from 300,000 gallons per day [gpd] to 450,000 gpd. The Cohasset Wastewater Treatment Plant [WWTP] was recently upgraded in November 2000 from 72,000 gpd to 300,000 gpd which also included nitrogen removal capabilities. The expansion to 450,000 gpd will continue the ability to remove nitrogen from the wastewater.

The requirement to sewer selected areas of the Town is part of the "Second Amended Final Judgment" between the town and the Commonwealth of Massachusetts. This mandated project will result in local improvement in the receiving waters [Little harbor and Inner Little Harbor], and will limit the total nutrient loading to Cohasset Harbor.

The quality of Cohasset Harbor was evaluated by the Massachusetts Bay National Estuary Program in 2006 with a series of water quality surveys from June to September 2006. The program selected 5 sampling locations: 2 within the Cohasset Inner Harbor, one at the "Gulf", and 2 outside the harbor in open coastal waters. The project evaluated the following: tidal stage, temperature, salinity, dissolved oxygen, total dissolved nitrogen and chlorophyll.

The results of the studies showed moderate levels of nitrogen in both inner harbor and outer harbor samples. The response indicators, dissolved oxygen and chlorophyll a, were of high quality and support the uses designated in the receiving waters. The results were compared to the MassDEP estuaries project nitrogen goals and the results were indicative of high quality waters at the selected sampling locations.

The sewer project will result in increased flows at the WWTP and some increase in the total nitrogen loading to Cohasset Harbor. The current WWTP has a capacity of 300,000 gpd and has demonstrated an ability to treat to total nitrogen levels of 6-12 mg/l. This would be approximately 25 lbs/day of total nitrogen at full capacity. The new NPDES permit issued to the Town will limit the amount of total nitrogen allowed to be discharged into Cohasset Harbor. The permit will limit total annual average flow from the facility to 450,000 gpd and will limit the total nitrogen discharged to 10 mg/l or 37.5 pounds per day [lbs/day]. This is a potential increase of 12.5 lbs/day of total nitrogen [note however that the current permit does not limit nitrogen although the WWTP has been operating in a nitrogen removal mode].

The sewer project will result in a decrease in nitrogen loadings from septic systems, which drain into the James Brook area, a tributary to the inner harbor. It is estimated that 5 lbs/day of nitrogen will be removed from this tributary system and that the wastewater from this area will receive nitrogen removal treatment at the WTF. Another nitrogen mitigation element will be the implementation of a by-law in the Town, which will reduce the allowable loading of nutrients from residential areas within the community.

The current and projected nitrogen loadings to Cohasset Harbor are judged to be in a range, which will continue to meet water quality goals. However, due to the critical habitat and the need to protect against future problems, the new NPDES permit will require ambient monitoring of the inner and outer harbor to track the quality of the waters and to determine if nutrients levels from the WTF are approaching levels, which could cause water quality degradation. If such signs are detected, the NPDES permit will be modified to reduce the allowable total nitrogen load from the WTF.

MassDEP has determined that the projected loadings of nitrogen from the WWTP to Cohasset Harbor are in compliance with the anti-degradation policies and regulations of MassDEP. The sewer project is mandated by MassDEP in order to improve water quality; the option to sewer the wastewater to the town of Cohasset WTP is an environmentally solid decision and the treatment level at the WWTP will remove nitrogen to a level to maintain and protect the receiving waters in Cohasset Harbor.

In addition, mitigation of nitrogen sources by removing failing septic systems and the accompanying nitrogen loads and the implementation of a by-law to limit nutrient usage in the town are additional measures to assure that water quality standards are met. Finally, the NPDES permit will require ambient monitoring to track the quality of the receiving waters and will lead to changes in permit conditions if necessary.

MassDEP has determined that the proposed project and the proposed NPDES permit

conditions are in compliance with the Water Quality Standards Anti-degradation provisions at 314 CMR 4.04.

Other mitigation of the nitrogen loading to the receiving waters includes plans by the Town of Scituate to sewer a small part of the drainage area (in District 3) that flows from North Scituate into the Gulf, which in turn flows into Cohasset Harbor. Scituate also plans to sewer the Minot area, which may currently contribute pollutants to the Cohasset Harbor.

In addition to the effluent limitations noted in the Antidegradation Statement, the loading (pounds per day) of biochemical oxygen demand and total suspended solids shall not be increased when the plant expands.

The public is invited to participate in the antidegradation finding through the permit public notice procedure.

4. Available Dilution

Water quality based limitations are established with the use of a calculated available dilution. Title 314 CMR 4.03(3)(c) requires that effluent dilution be calculated on a case-by-case basis. The critical dilution was calculated by Coughlin Environmental Services using a CORMIX I model. The outfall is located approximately 135 feet from shore in Cohasset Harbor at a depth of 14 feet below mean high water. The outfall has 3 “duck-bill diffusers”. The dilution ratio is 30:1 at a plant flow of 0.3 mgd. The dilution ratio is calculated to remain the same when the plant expands to 0.45 mgd because of increased initial discharge port velocity.

5. Effluent Limits and Monitoring Requirements

Flow - The current flow limit of 0.3 mgd is based on the annual average design flow of the treatment plant. The plant capacity will expand 0.45 mgd during the effective period of the draft permit. Federal regulations found at 40 CFR §122.45(b)(i) require that effluent limitations for municipal facilities be calculated based on design flow, which is found in the Permit Application Form 2A, Part A, Section a.6. Flow is to be measured continuously. The permittee shall report the annual average monthly flow using the annual rolling average method (See Permit Footnote 2). The maximum, minimum and total flow for each operating date shall also be reported.

CONVENTIONAL POLLUTANTS

Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS) - The draft permit includes average monthly and average weekly BOD₅ and TSS limitations which are based on secondary treatment requirements set forth at 40 C.F.R. §133.102(a)(1) and (2) and 40 C.F.R. §133.102(b)(1) and (2), respectively for the current design flow of 0.3 mgd.

When the plant design flow is increased to 0.45 mgd, the loading shall remain the same based on antidegradation requirements found at Title 314 CMR 4.04. The weekly and monthly concentration limits for both BOD₅ and TSS shall be proportionally reduced to 20 mg/l as a monthly average and 30 mg/l as a weekly average.

The mass limitations for BOD₅ and TSS are based on the 0.3 mgd and 0.45 mgd design flows. Average monthly and average weekly BOD₅ and TSS mass limits (lbs per day) are required under 40 CFR §122.45(f).

BOD₅ and TSS Mass Loading Calculations:

Calculations of maximum allowable loads for average monthly BOD₅ and TSS are based on the following equation:

$L = C \times DF \times 8.34$ or $L = C \times DF \times 3.79$ where:

L = Maximum allowable load in lbs/day.

C = Maximum allowable effluent concentration for reporting period in mg/l.

Reporting periods are average monthly and weekly and daily maximum.

DF = Design flow of facility in mgd.

8.34 = Factor to convert effluent concentration in mg/l and design flow in mgd to lbs/day.

3.79 = Factor to convert effluent concentration in mg/l and design flow in mgd to kgs/day.

Plant design flow = 0.3 mgd

(Concentration limit) [45] X 8.34 (Constant) X 0.30 (design flow) = 113 lb/day

(Concentration limit) [45] X 3.79 (Constant) X 0.30 (design flow) = 51 kg/day

(Concentration limit) [30] X 8.34 (Constant) X 0.30 (design flow) = 75 lb/day

(Concentration limit) [30] X 3.79 (Constant) X 0.30 (design flow) = 34 kg/day

Plant design flow = 0.45 mgd

(Concentration limit) [30] X 8.34 (Constant) X 0.45 (design flow) = 113 lb/day

(Concentration limit) [30] X 3.79 (Constant) X 0.45 (design flow) = 51 kg/day

(Concentration limit) [20] X 8.34 (Constant) X 0.45 (design flow) = 75 lb/day

(Concentration limit) [20] X 3.79 (Constant) X 0.45 (design flow) = 34 kg/day

Eighty-Five Percent (85%) BOD₅ and TSS Removal - the provisions of 40 CFR §133.102(a)(3) and 40 CFR §133.102(b)(3), require that the 30 day average percent removal for BOD₅ and TSS be not less than 85%.

pH - The pH limits in this draft permit are more stringent than the requirements found in 40 CFR §133.102(c). The draft permit includes pH limitations which are required by state water quality standards, and are protective of pH standards set forth at Title 314 CMR 4.05(4)(b)(3), for Class SA waters. The pH range of 6.5 to 8.5 SU is carried forward from the current permit. The frequency of sampling remains 1/day.

Fecal Coliform Bacteria - The draft permit includes fecal coliform bacteria limitations which are in accordance with the Massachusetts Surface Water Quality Standards 314 CMR 4.06(1)(d)(4). The proposed limits in the draft permit are 14 colony forming units (cfu)/100 ml for the average monthly limit and 28 colony forming units (cfu)/100 ml for the maximum daily limit. Colony forming units (cfu) or most probable number (MPN) units are determined by the method of analysis used for bacteria analysis. Both units are acceptable. The frequency of sampling shall be maintained at 3/week.

Enterococci - Monthly sampling for Enterococci is required to ascertain compliance with the water quality criteria promulgated by EPA on November 16, 2004 for Massachusetts Coastal Waters. Massachusetts has since adopted water quality criteria for Enterococci, which have not yet been approved by EPA. Upon approval of the State criteria, the federal criteria will no longer apply.

NON-CONVENTIONAL POLLUTANTS

Nitrogen Monitoring: Total Nitrogen, Total Kjeldahl Nitrogen, Total Nitrite-Nitrate, and Total Ammonia Nitrogen - The draft permit includes a monthly average limit of 10 mg/l for total nitrogen, effective upon completion of the treatment plant upgrade to 0.45 mgd. The draft permit requires effluent sampling from May 1st Through October 31st each year for total nitrogen (Kjeldahl nitrogen plus nitrite and nitrate), and total ammonia as N. The nitrogen monitoring and average monthly limit are in place to ensure that the contribution of nitrogen (a nutrient) to Cohasset Harbor will not cause or contribute to cultural eutrophication. The combination of effluent and ambient monitoring will serve to confirm the MassDEP antidegradation conclusions made pursuant to 40 CFR Section 131.12.

Whole Effluent Toxicity – (WET) Under Section 301(b)(1)(C) of the CWA, discharges are subject to effluent limitations based on water quality standards. The Massachusetts Surface Water Quality Standards include the following narrative statement and requires that EPA criteria established pursuant to Section 304(a)(1) of the CWA be used as guidance for interpretation of the following narrative criteria: “All surface waters shall be free from pollutants in concentrations or combinations that are toxic to humans, aquatic life or wildlife.”

National studies conducted by the EPA have demonstrated that domestic sources contribute toxic constituents. These constituents include metals, chlorinated solvents, aromatic hydrocarbons and others. The Region's current policy is to include toxicity testing requirements in all permits, while Section 101(a) (3) of the CWA specifically prohibits the discharge of toxic pollutants in toxic amounts.

Based on the potential for toxicity resulting from domestic sewage, in accordance with EPA national and regional policy, and in accordance with MassDEP policy, the draft permit includes acute toxicity limitations and monitoring requirements. (See Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants, 50 Fed. Reg. 30,784 (July 24, 1985); EPA's Technical Support Document for Water Quality-Based Toxics Control", September, 1991; and MassDEP's Implementation Policy for the Control of Toxic Pollutants in Surface Waters (February 23, 1990).

Pursuant to EPA, Region I and MassDEP policy, discharges having a dilution factor between 20:1 and 100:1 (30:1 for this discharge) require acute toxicity testing and an acute LC₅₀ limit of $\geq 100\%$. The draft permit requires the permittee to conduct four chronic (modified acute) WET tests per year. The tests use the species, Mysid Shrimp (Mysidopsis bahia or Americamysis bahia) Inland Silverside (Menidia beryllina), in accordance with existing permit conditions, and are to be conducted in accordance with the EPA Region I Toxicity protocol found in the permit Attachment A.

Ambient Monitoring

Section 308 of the CWA grants EPA the authority to require monitoring to establish the efficacy of water quality based limits in permits.

As described in the State's Antidegradation Statement, studies conducted by the Massachusetts Bay National Estuary Program indicate that the current nitrogen and chlorophyll *a* concentrations in Cohasset Cove are indicative of high quality Class SA marine waters. To ensure that the nitrogen limitations in the permit, coupled with other anticipated reductions in nitrogen discharges documented in the Antidegradation statement are sufficient to maintain existing water quality, the draft permit requires that the permittee conduct an ambient monitoring program.

The draft permit requires ambient monitoring for total nitrogen, salinity, chlorophyll *a*, temperature, dissolved oxygen, Kjeldahl nitrogen, total ammonia as N, and total nitrite+nitrate. Chlorophyll *a* and dissolved oxygen are measures of the growth of aquatic flora and as such are good indicators of potential eutrophication. Ambient temperature and salinity affect dissolved oxygen saturation, nitrogen speciation, and plant growth and so shall be taken concurrently with the nitrogen and dissolved oxygen monitoring.

The draft permit requires the permittee to sample at five representative locations in and around the Cohasset Harbor. Sampling will be in the first full season (May 1st to October 31st) and during the last two seasons of the five year permit cycle.

EPA and MassDEP will use the monitoring data during the next permit reissuance to reassess the effectiveness of the nitrogen limits in the draft permit.

V. ESSENTIAL FISH HABITAT (EFH)

Under the 1996 Amendments (PL 104-297) to the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 *et seq.* (1998)), EPA is required to consult with the National Marine Fisheries Service (NOAA Fisheries) if EPA's actions, or proposed actions that EPA funds, permits, or undertakes, "may adversely impact any essential fish habitat." 16 U.S.C. § 1855(b). The Amendments broadly define essential fish habitat as, "... those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity." 16 U.S.C. § 1802(10). Adverse effect means any impact which reduces the quality and/or quantity of EFH. 50 C.F.R. § 600.910(a). Adverse effects may include direct (e.g., contamination or physical disruption), indirect (e.g., loss of prey, reduction in species' fecundity), site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions. *Id.*

EFH is only designated for species for which federal Fishery Management Plans exist (16 U.S.C. § 1855(b)(1)(A)). EFH designations were approved for New England by the U.S. Department of Commerce on March 3, 1999.

As the federal agency charged with authorizing the discharge from this facility, EPA is initiating consultation with NOAA Fisheries in this Fact Sheet consistent with the Finding established between these agencies, as specified in a NOAA Fisheries letter to EPA, dated October 10, 2000. This consultation will be completed before the permit is finalized.

Proposed Action

EPA is reissuing the National Pollutant Discharge Elimination System (NPDES) individual permit for the Cohasset Wastewater Treatment Plant (WWTP). Please see Section B.3 of this Fact Sheet for a more detailed description of the proposed action.

EFH Species

A list of the EFH species and their applicable life stages identified for Cohasset Harbor and environs is found in Fact Sheet Attachment D.

Analysis of Effects

The increase in the wastewater treatment plant capacity by 150,000 gpd is to accommodate sewer expansion to eliminate failing sub-surface wastewater systems in coastal watersheds that have direct hydraulic connections to Little Harbor and Cohasset Harbor. The addition of a nitrogen limit and maintaining BOD and TSS loadings to the current levels will work to insure water quality is maintained in Cohasset Harbor. Additionally, ambient nutrient and dissolved oxygen monitoring during the term of the permit will insure that the nutrient contribution from the plant does not result in lowering water quality.

VI. SLUDGE INFORMATION AND REQUIREMENTS

The Cohasset WWTP produces approximately 59.68 dry metric tons of sludge each year. Section 405(d) of the Clean Water Act requires that sludge conditions be included in all POTW permits. Sludge from the WWTF is currently trucked off-site to the Brockton WWTP (MA0101010) where it is blended, thickened, dewatered, and incinerated. If the ultimate sludge disposal method changes, the permittee must notify EPA and MassDEP and the requirements pertaining to sludge monitoring and other conditions would change accordingly (See enclosed Sludge Guidance Document).

VII. UNAUTHORIZED DISCHARGES

The permittee is authorized to discharge only in accordance with the terms and conditions of this permit and only from the outfall(s) listed in Part I A.1. of this permit. Discharges of wastewater from any other point sources are not authorized by the permit and shall be reported in accordance with Section D.1.e. (1), of the General Requirements of the permit (Twenty-four hour reporting).

The facility has a history of overflows during wet weather of partially treated effluent. These discharges are prohibited in the draft permit. The draft permit requires that such bypass discharges be monitored for the pollutants limited in Section I.A of the permit so as to assess the volume and strength of bypassed wastewater.

VIII. OPERATION AND MAINTENANCE OF THE SEWER SYSTEM

The permit standard conditions for "Proper Operation and Maintenance" are found at 40 CFR 122.41(e). These require proper operation and maintenance of permitted wastewater systems and related facilities to achieve permit conditions. Similarly, the permittee has a "duty to mitigate" are stated in 40 CFR §122.41(d). This requires the permittee to take all reasonable steps to minimize or prevent any discharge in violation of the permit which has the reasonable likelihood of adversely affecting human health or the environment. EPA and MassDEP maintain that these programs are an integral component of ensuring permit compliance under both these provisions.

The draft permit includes requirements for the permittee to control infiltration and inflow (I/I). Infiltration is groundwater that enters the collection system through physical defects such as cracked pipes, or deteriorated joints. Inflow is extraneous flow entering the collection system through point sources such as roof leaders, yard and area drains, sump pumps, manhole covers, tide gates, and cross connections from storm water systems. Significant I/I in a collection system may displace sanitary flow reducing the capacity and the efficiency of the treatment works and may cause bypasses to secondary treatment. It greatly increases the potential for sanitary sewer overflows (SSO) in separate systems.

The permittee estimates the rate of I/I in the collection system to be as much as one million gallons per day (2005 permit application). The permittee has recorded maximum flow rates of about 1.5 mgd.

The permittee shall develop an I/I removal program for its separate sewers commensurate with the severity of the I/I in the collection system. Where portions of the collection system have little I/I, the control program will logically be scaled down.

This requires the permittee to take all reasonable steps to minimize or prevent any discharge in violation of the permit. EPA and MassDEP maintain that an I/I removal program is an integral component to insuring permit compliance under both of these provisions.

IX. MONITORING AND REPORTING

The permittee is obliged to monitor and report sampling results to EPA and the MassDEP within the time specified in the permit. The effluent monitoring requirements have been established to yield data representative of the discharge by the authority under Section 308(a) of the CWA in accordance with 40 CFR, 122.44, and 122.48.

X. STATE PERMIT CONDITIONS

The NPDES Permit is issued jointly by the U. S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection under federal and state law, respectively. As such, all the terms and conditions of the permit are, therefore, incorporated into and constitute a discharge permit issued by the MassDEP Commissioner.

XI. GENERAL CONDITIONS

The general conditions of the permit are based primarily on the NPDES regulations 40 CFR 122 through 125 and consist primarily of management requirements common to all permits.

XII. STATE CERTIFICATION REQUIREMENTS

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the Massachusetts Department of Environmental Protection has reviewed the draft permit. EPA has requested permit certification by the State pursuant to 40 CFR 124.53 and expects that the draft permit will be certified.

XIII. COMMENT PERIOD AND PROCEDURES FOR FINAL DECISION

As part of the permit procedure, EPA and MassDEP will accept comments from the public on the proposed permit, see Page 1 of this document for dates. Pursuant to 40 C.F.R § 122.62, only the conditions specifically proposed in the draft permit are subject to public comment. Comments on any other conditions of the permit will not be accepted.

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period to the EPA and MassDEP contacts listed below. Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty (30) days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. In reaching a final decision on the draft permit the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice.

XIV. EPA CONTACT

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

Doug Corb
Office of Ecosystem Protection
U.S. Environmental Protection Agency
One Congress Street,
Suite-1100 (CMP)
Boston, MA 02114-2023
Telephone: (617) 918-1565
corb.doug@epa.gov

Paul Hogan
MA Department of Environmental Protection
Division of Watershed Management
627 Main Street, 2nd floor
Worcester, MA 01608
Telephone: (508) 767-2796
Fax: 508-791-4131
paul.hogan@state.ma.us

Date: April 23, 2007

Stephen S. Perkins, Director*
Office of Ecosystem Protection
U.S. Environmental Protection Agency

* Please address all comments to Doug Corb and Paul Hogan at the addresses above

MA0100285 FACT SHEET ATTACHMENT A DMR DATA & VIOLATIONS

Acronyms: MVDT = DMR Date NODI = No discharge Code MQAV & MCAV = Monthly Average Limit
 MQMX & MCMX = Daily Maximum Limit VQAV, VQMX, VCMN, VCAV & VCMX = Percent Violations in Corresponding columns

001A LIMITS UNDER ORDER BOD, 5-DAY PERCENT REMOVAL PER- CENT PERCENT REMOVAL
 MVDT NODI MQAV MQMX VQAV VQMX MCMN MCAV MCMX VCMN VCAV VCMX

MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
03/31/04		0	0	100		0	0	0			
04/30/04		0	0	100		0	0	0			
05/31/04		0	0	100.0		0	0	0			
06/30/04		0	0	99.8		0	0	0			
07/31/04		0	0	100.0		0	0	0			
08/31/04		0	0	100		0	0	0			
09/30/04		0	0	100		0	0	0			
10/31/04		0	0	99.1		0	0	0			
11/30/04		0	0	99.4		0	0	0			
12/31/04		0	0	99.3		0	0	0			
01/31/05		0	0	97.5		0	0	0			
02/28/05		0	0	99.3		0	0	0			
04/30/05		0	0	99.5		0	0	0			
05/31/05		0	0	100		0	0	0			
06/30/05		0	0	100		0	0	0			
07/31/05		0	0	100		0	0	0			
08/31/05		0	0	99.5		0	0	0			
09/30/05		0	0	99		0	0	0			
10/31/05		0	0	100		0	0	0			
11/30/05		0	0	100		0	0	0			
12/31/05		0	0	100		0	0	0			
01/31/06		0	0	100		0	0	0			
02/28/06		0	0	100		0	0	0			
03/31/06		0	0	100		0	0	0			
04/30/06		0	0	100		0	0	0			
05/31/06		0	0	98.2		0	0	0			
06/30/06		0	0	-----		0	0	0			
07/31/06		0	0	100		0	0	0			
08/31/06		0	0	100		0	0	0			
09/30/06		0	0	-----		0	0	0			
10/31/06		0	0	-----		0	0	0			
11/30/06		0	0	-----		0	0	0			
12/31/06		0	0	-----		0	0	0			
01/31/07		0	0	-----		0	0	0			
02/28/07		0	0	100		0	0	0			
03/31/07		0	0	100		0	0	0			

DSDG PIPE		PRAM		LQUC		LCUC		MLOC			
001A TREATED WASTES		SOLIDS, SUSPENDED				PERCENT REMOVAL			PER- CENT PERCENT REMOVAL		
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
03/31/04		0	0	98.4		0	0	0			
04/30/04		0	0	100		0	0	0			
05/31/04		0	0	98.8		0	0	0			
06/30/04		0	0	98.9		0	0	0			
07/31/04		0	0	99.3		0	0	0			
08/31/04		0	0	98.9		0	0	0			
09/30/04		0	0	98.1		0	0	0			
10/31/04		0	0	99.3		0	0	0			
11/30/04		0	0	97.9		0	0	0			
12/31/04		0	0	99		0	0	0			
01/31/05		0	0	100		0	0	0			
02/28/05		0	0	98.5		0	0	0			
04/30/05		0	0	100		0	0	0			
05/31/05		0	0	100		0	0	0			
06/30/05		0	0	100		0	0	0			
07/31/05		0	0	100		0	0	0			
08/31/05		0	0	100		0	0	0			
09/30/05		0	0	98.6		0	0	0			
10/31/05		0	0	100		0	0	0			
11/30/05		0	0	100		0	0	0			
12/31/05		0	0	100		0	0	0			
01/31/06		0	0	100		0	0	0			
02/28/06		0	0	100		0	0	0			
03/31/06		0	0	99.7		0	0	0			
04/30/06		0	0	100		0	0	0			
05/31/06		0	0	100		0	0	0			
06/30/06		0	0	-----		0	0	0			
07/31/06		0	0	100		0	0	0			
08/31/06		0	0	100		0	0	0			
09/30/06		0	0	-----		0	0	0			
10/31/06		0	0	-----		0	0	0			
11/30/06		0	0	-----		0	0	0			
12/31/06		0	0	99.3		0	0	0			
01/31/07		0	0	-----		0	0	0			
02/28/07		0	0	100		0	0	0			
03/31/07		0	0	98.9		0	0	0			

DSDG PIPE		PRAM		LQUC		LCUC	MLOC		SEE COMMENTS BELOW			
001A TREATED WASTES		BOD, 5-DAY		(20 DEG. C)		LBS/DY						
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX	
03/31/04	0	0	0			0	0	0				
04/30/04	0	0	0			0	0	0				
05/31/04	0	0	0			0	0	0				
06/30/04	1.2	0	0			0	0	0				
07/31/04	0	0	0			0	0	0				
08/31/04	0	0	0			0	0	0				
09/30/04	0	0	0			0	0	0				
10/31/04	3.3	0	0			0	0	0				
12/31/04	2.6	0	0			0	0	0				
11/30/04	1.8	0	0			0	0	0				
01/31/05	7	0	0			0	0	0				
02/28/05	4.7	0	0			0	0	0				
04/30/05	2.4	0	0			0	0	0				
05/31/05	0	0	0			0	0	0				
06/30/05	0	0	0			0	0	0				
07/31/05	0	0	0			0	0	0				
08/31/05	1.6	0	0			0	0	0				
09/30/05	3	0	0			0	0	0				
10/31/05	0	0	0			0	0	0				
11/30/05	0	0	0			0	0	0				
12/31/05	0	0	0			0	0	0				
01/31/06	0	0	0			0	0	0				
02/28/06	0	0	0			0	0	0				
03/31/06	0	0	0			0	0	0				
04/30/06	0	0	0			0	0	0				
05/31/06	14.4	0	0			0	0	0				
06/30/06	NODI	0	0			0	0	0				
07/31/06	0	0	0			0	0	0				
08/31/06	0	0	0			0	0	0				
09/30/06	0	0	0			0	0	0				
10/31/06	2	0	0			0	0	0				
11/30/06	0	0	0			0	0	0				
12/31/06	NODI	0	0			0	0	0				
01/31/07		0	0			0	0	0				
02/28/07	0	0	0			0	0	0				
03/31/07	0	0	0			0	0	0				

001A TREATED WASTES	SOLIDS, TOTAL			SUSPENDED		LBS/DY		SEE COMMENTS BELOW				
	MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
03/31/04	7.1		0	0			0	0	0			
04/30/04	0		0	0			0	0	0			
05/31/04	6.3		0	0			0	0	0			
06/30/04	8.1		0	0			0	0	0			
07/31/04	5.8		0	0			0	0	0			
08/31/04	13.2		0	0			0	0	0			
09/30/04	12.3		0	0			0	0	0			
10/31/04	2.6		0	0			0	0	0			
11/30/04	10		0	0			0	0	0			
12/31/04	3.5		0	0			0	0	0			
01/31/05	0		0	0			0	0	0			
02/28/05	8.8		0	0			0	0	0			
04/30/05	0		0	0			0	0	0			
05/31/05	0		0	0			0	0	0			
06/30/05	0		0	0			0	0	0			
07/31/05	0		0	0			0	0	0			
08/31/05	0		0	0			0	0	0			
09/30/05	3.2		0	0			0	0	0			
10/31/05	0		0	0			0	0	0			
11/30/05	0		0	0			0	0	0			
12/31/05	0		0	0			0	0	0			
01/31/06	0		0	0			0	0	0			
02/28/06	0		0	0			0	0	0			
03/31/06	5.6		0	0			0	0	0			
04/30/06	0		0	0			0	0	0			
05/31/06	0		0	0			0	0	0			
06/30/06	NODI		0	0			0	0	0			
07/31/06	0		0	0			0	0	0			
08/31/06	0		0	0			0	0	0			
09/30/06	0		0	0			0	0	0			
10/31/06	0		0	0			0	0	0			
11/30/06	2.2		0	0			0	0	0			
12/31/06	NODI		0	0			0	0	0			
01/31/07	0		0	0			0	0	0			
02/28/07	0		0	0			0	0	0			
03/31/07	5.78		0	0			0	0	0			

PH

MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
04/30/04			0 0	6.5	6.7	0 0	0				
03/31/04			0 0	6.5	6.7	0 0	0				
05/31/04			0 0	6.5	6.7	0 0	0				
06/30/04			0 0	6.5	6.9	0 0	0				
07/31/04			0 0	6.6	6.9	0 0	0				
08/31/04			0 0	6.6	6.8	0 0	0				
09/30/04			0 0	6.6	6.8	0 0	0				
10/31/04			0 0	6.7	6.8	0 0	0				
11/30/04			0 0	6.7	6.8	0 0	0				
12/31/04			0 0	6.7	6.8	0 0	0				
01/31/05			0 0	6.6	6.8	0 0	0				
02/28/05			0 0	6.6	8.0	0 0	0				
03/31/05			0 0	NODI	NODI	0 0	0				
04/30/05			0 0	6.72	6.86	0 0	0				
05/31/05			0 0	6.67	6.86	0 0	0				
06/30/05			0 0	6.71	6.87	0 0	0				
07/31/05			0 0	6.72	6.87	0 0	0				
08/31/05			0 0	6.7	6.82	0 0	0				
09/30/05			0 0	6.7	6.84	0 0	0				
10/31/05			0 0	6.62	6.86	0 0	0				
11/30/05			0 0	6.72	6.89	0 0	0				
12/31/05			0 0	6.7	6.86	0 0	0				
01/31/06			0 0	6.67	6.85	0 0	0				
02/28/06			0 0	6.71	6.88	0 0	0				
03/31/06			0 0	6.55	6.81	0 0	0				
04/30/06			0 0	6.72	6.86	0 0	0				
05/31/06			0 0	6.7	6.99	0 0	0				
06/30/06			0 0	NODI	NODI	0 0	0				
07/31/06			0 0	6.73	6.86	0 0	0				
08/31/06			0 0	6.7	6.89	0 0	0				
09/30/06			0 0	6.52	6.88	0 0	0				
10/31/06			0 0	6.6	6.81	0 0	0				
11/30/06			0 0	6.54	7.7	0 0	0				
12/31/06			0 0	NODI	NODI	0 0	0				
01/31/07			0 0			0 0	0				
02/28/07			0 0	6.52	6.86	0 0	0				
03/31/07			0 0	6.55	6.81	0 0	0				

001A TREATED WASTES			SOLIDS, TOTAL				SUSPENDED			LBS/DY		MG/L EFFLUENT		GROSS VALUE
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX			
04/30/04	0	0	0	0	0	0	0	0	0	0	0			
03/31/04	7.1	15.3	0	4	4	9	0	0	0					
05/31/04	6.3	6.3	0	4.0	4.0	12.0	0	0	0					
06/30/04	8.1	23.4	0	4.8	4.8	13	0	0	0					
07/31/04	5.8	7.9	0	4	4	5	0	0	0					
08/31/04	13.2	29.4	0	6.6	6.6	18	0	0	0					
09/30/04	12.3	27.4	0	7	7	14	0	0	0					
10/31/04	2.6	10.5	0	1.5	1.5	6	0	0	0					
11/30/04	10	21.1	0	5	5	13	0	0	0					
12/31/04	3.5	7.8	0	1.8	1.8	4.0	0	0	0					
01/31/05	0	0	0	0	0	0	0	0	0					
02/28/05	8.8	21.3	0	4	4	10	0	0	0					
03/31/05	NODI	NODI	0	NODI	NODI	NODI	0	0	0					
04/30/05	0	0	0	0	0	0	0	0	0					
05/31/05	0	0	0	0	0	0	0	0	0					
06/30/05	0	0	0	0	0	0	0	0	0					
07/31/05	0	0	0	0	0	0	0	0	0					
08/31/05	0	0	0	0	0	0	0	0	0					
09/30/05	3.2	12.7	0	1.8	1.8	7	0	0	0					
10/31/05	0	0	0	0	0	0	0	0	0					
11/30/05	0	0	0	0	0	0	0	0	0					
12/31/05	0	0	0	0	0	0	0	0	0					
01/31/06	0	0	0	0	0	0	0	0	0					
02/28/06	0	0	0	0	0	0	0	0	0					
03/31/06	5.6	22.3	0	3	3	2	0	0	0					
04/30/06	0	0	0	0	0	0	0	0	0					
05/31/06	0	0	0	0	0	0	0	0	0					
06/30/06	NODI	NODI	0	NODI	NODI	NODI	0	0	0					
07/31/06	0	0	0	0	0	0	0	0	0					
08/31/06	0	0	0	0	0	0	0	0	0					
09/30/06	3.2	12.7	0	1.8	1.8	7	0	0	0					
10/31/06	0	0	0	0	0	0	0	0	0					
11/30/06	2.2	8.8	0	0.9	0.9	3.7	0	0	0					
12/31/06	NODI	NODI	0	NODI	NODI	NODI	0	0	0					
01/31/07			0				0	0	0					
02/28/07	0	0	0	0	0	0	0	0	0					
03/31/07	5.6	13.6	0	2	6	6	0	0	0					

001A TREATED WASTES			NITROGEN, TOTAL			(AS N)			MG/L EFFLUENT GROSS VALUE		
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
03/31/04			0	0	4.96	0	0	0			
04/30/04			0	0	6.58	0	0	0			
05/31/04			0	0	9.32	0	0	0			
06/30/04			0	0	6.29	0	0	0			
07/31/04			0	0	5.77	0	0	0			
08/31/04			0	0	6.2	0	0	0			
09/30/04			0	0	7.94	0	0	0			
10/31/04			0	0	7.01	0	0	0			
11/30/04			0	0	7.81	0	0	0			
12/31/04			0	0	7.24	0	0	0			
01/31/05			0	0	6.86	0	0	0			
02/28/05			0	0	6.59	0	0	0			
03/31/05			0	0	NODI	0	0	0			
04/30/05			0	0	5.38	0	0	0			
05/31/05			0	0	6.1	0	0	0			
06/30/05			0	0	8.3	0	0	0			
07/31/05			0	0	8.15	0	0	0			
08/31/05			0	0	8.4	0	0	0			
09/30/05			0	0	6.2	0	0	0			
10/31/05			0	0	6.2	0	0	0			
11/30/05			0	0	5.9	0	0	0			
12/31/05			0	0	5.13	0	0	0			
01/31/06			0	0	6.38	0	0	0			
02/28/06			0	0	9.67	0	0	0			
03/31/06			0	0	7.99	0	0	0			
04/30/06			0	0	7.14	0	0	0			
05/31/06			0	0	10.11	0	0	0			
06/30/06			0	0	NODI	0	0	0			
07/31/06			0	0	11.6	0	0	0			
08/31/06			0	0	12.19	0	0	0			
09/30/06			0	0	11.87	0	0	0			
10/31/06			0	0	17.3	0	0	0			
11/30/06			0	0	15.06	0	0	0			
12/31/06			0	0	NODI	0	0	0			
01/31/07			0	0	----	0	0	0			
02/28/07			0	0	7.1	0	0	0			
03/31/07			0	0	8.65	0	0	0			

001A TREATED WASTES		FLOW, IN CONDUIT OR THRU TREATMENT PLANT							MGD	EFFLUENT GROSS VALUE	
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
03/31/04	0.220		0 0			0 0 0					
04/30/04	0.2216		0 0			0 0 0					
05/31/04	0.2219		0 0			0 0 0					
06/30/04	0.218		0 0			0 0 0					
07/31/04	0.218		0 0			0 0 0					
08/31/04	0.219		0 0			0 0 0					
09/30/04	0.222		0 0			0 0 0					
10/31/04	0.224		0 0			0 0 0					
11/30/04	0.224		0 0			0 0 0					
12/31/04	0.222		0 0			0 0 0					
01/31/05	0.229		0 0			0 0 0					
02/28/05	0.237		0 0			0 0 0					
03/31/05	NODI		0 0			0 0 0					
04/30/05	0.241		0 0			0 0 0					
05/31/05	0.246		0 0			0 0 0					
06/30/05	0.250		0 0			0 0 0					
07/31/05	0.249		0 0			0 0 0					
08/31/05	0.2495		0 0			0 0 0					
09/30/05	0.2514		0 0			0 0 0					
10/31/05	0.265		0 0			0 0 0					
11/30/05	0.2744		0 0			0 0 0					
12/31/05	0.278		0 0			0 0 0					
01/31/06	0.2805		0 0			0 0 0					
02/28/06	0.279		0 0			0 0 0					
03/31/06	0.27		0 0			0 0 0					
04/30/06	0.27		0 0			0 0 0					
05/31/06	0.28		0 0			0 0 0					
06/30/06	NODI		0 0			0 0 0					
07/31/06	0.29		0 0			0 0 0					
08/31/06	0.3		0 0			0 0 0					
09/30/06	0.29		0 0			0 0 0					
10/31/06	0.28		0 0			0 0 0					
11/30/06	0.28		0 0			0 0 0					
12/31/06	NODI		0 0			0 0 0					
01/31/07	-----		0 0			0 0 0					
02/28/07	0.262		0 0			0 0 0					
03/31/07	0.272		0 0			0 0 0					

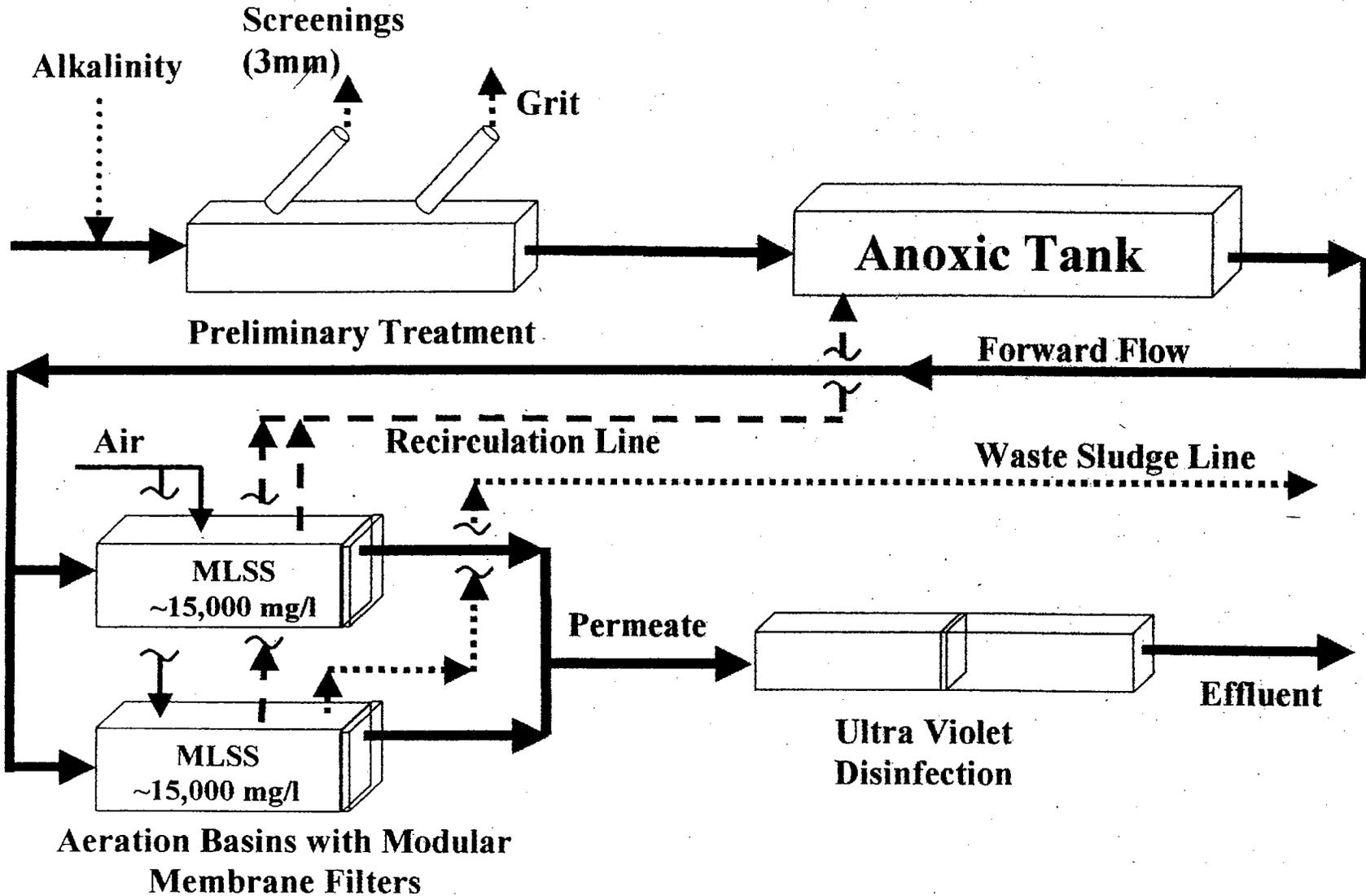
001A TREATED WASTES		COLIFORM, TOTAL			GENERAL			MPN/ 100ML EFFLUENT GROSS VALUE			
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
04/30/04		0	0	1	1	0	0	0			
03/31/04		0	0	1	1	0	0	0			
05/31/04		0	0	1	1	0	0	0			
06/30/04		0	0	1	1	0	0	0			
07/31/04		0	0	1	1	0	0	0			
08/31/04		0	0	1	1	0	0	0			
09/30/04		0	0	1	1	0	0	0			
10/31/04		0	0	1	1	0	0	0			
11/30/04		0	0	1	1	0	0	0			
12/31/04		0	0	1	1	0	0	0			
01/31/05		0	0	1	1	0	0	0			
02/28/05		0	0	2	20	0	0	0			
03/31/05		0	0	1	1	0	0	0			
04/30/05		0	0	1	25	0	0	0			
05/31/05		0	0	1	3	0	0	0			
06/30/05		0	0	1	2	0	0	0			
07/31/05		0	0	1	17	0	0	0			
08/31/05		0	0	1	7	0	0	0			
09/30/05		0	0	1	1	0	0	0			
10/31/05		0	0	1	8	0	0	0			
11/30/05		0	0	2	1	0	0	0			
12/31/05		0	0	1	4	0	0	0			
01/31/06		0	0	1	1	0	0	0			
02/28/06		0	0	1	10	0	0	0			
03/31/06		0	0	1	2	0	0	0			
04/30/06		0	0	0	0	0	0	0			
05/31/06		0	0	4	200	0	0	0			
06/30/06		0	0	NODI	NODI0	0	0	0			
07/31/06		0	0	1	2	0	0	0			
08/31/06		0	0	1	7	0	0	0			
09/30/06		0	0	1	1	0	0	0			
10/31/06		0	0	1	13	0	0	0			
11/30/06		0	0	2	18	0	0	0			
12/31/06		0	0	NODI	NODI0	0	0	0			
01/31/07		0	0	-----	-----0	0	0	0			
02/28/07		0	0	1	10	0	0	0			
03/31/07		0	0	2	4	0	0	0			

001A TREATED WASTES		AMMONIA & AMMONIUM- TOTAL				MG/L EFFLUENT GROSS VALUE					
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
03/31/04			0 0	0.418		0 0 0					
04/30/04			0 0	0.31		0 0 0					
05/31/04			0 0	1.0		0 0 0					
06/30/04			0 0	0.84		0 0 0					
07/31/04			0 0	0.31		0 0 0					
08/31/04			0 0	0.25		0 0 0					
09/30/04			0 0	0.54		0 0 0					
10/31/04			0 0	0.29		0 0 0					
12/31/04			0 0	0.64		0 0 0					
11/30/04			0 0	0.44		0 0 0					
01/31/05			0 0	0.7		0 0 0					
02/28/05			0 0	0.58		0 0 0					
03/31/05			0 0	NODI		0 0 0					
04/30/05			0 0	0.4		0 0 0					
05/31/05			0 0	0.46		0 0 0					
06/30/05			0 0	0.79		0 0 0					
07/31/05			0 0	0.75		0 0 0					
08/31/05			0 0	0.94		0 0 0					
09/30/05			0 0	0.64		0 0 0					
10/31/05			0 0	0.52		0 0 0					
11/30/05			0 0	0.4		0 0 0					
12/31/05			0 0	0.45		0 0 0					
01/31/06			0 0	0.44		0 0 0					
02/28/06			0 0	0.383		0 0 0					
03/31/06			0 0	0.6		0 0 0					
04/30/06			0 0	0.61		0 0 0					
05/31/06			0 0	2.32		0 0 0					
06/30/06			0 0	NODI		0 0 0					
07/31/06			0 0	0.27		0 0 0					
08/31/06			0 0	0.24		0 0 0					
09/30/06			0 0	NODI		0 0 0					
10/31/06			0 0	0.19		0 0 0					
11/30/06			0 0	1.01		0 0 0					
12/31/06			0 0	NODI		0 0 0					
01/31/07			0 0	-----		0 0 0					
02/28/07			0 0	0.34		0 0 0					
03/31/07			0 0	0.34		0 0 0					

001T TOXICITY 4XYEAR		LC50 STAT 48HR ACU MYSID. BAHIA						PER- CENT EFFLUENT GROSS VALUE			
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
05/31/04		0	0			0	0	0			
08/31/04		0	0			0	0	0			
11/30/04		0	0			0	0	0			
02/28/05		0	0	100		0	0	0			
05/31/05		0	0	41.9		58	0	0			
08/31/05		0	0			0	0	0			
11/30/05		0	0	>100		0	0	0			
02/28/06		0	0	>100		0	0	0			
05/31/06		0	0	>100		0	0	0			
08/31/06		0	0	>100		0	0	0			
11/30/06		0	0	NODI		0	0	0			

001T TOXICITY 4XYEAR		LC50 STAT 48HR ACU MENIDIA						PER- CENT EFFLUENT GROSS VALUE			
MVDT	NODI	MQAV	MQMX	VQAV	VQMX	MCMN	MCAV	MCMX	VCMN	VCAV	VCMX
05/31/04		0	0			0	0	0			
08/31/04		0	0			0	0	0			
11/30/04		0	0			0	0	0			
02/28/05		0	0	100		0	0	0			
05/31/05		0	0	>100		0	0	0			
08/31/05		0	0			0	0	0			
11/30/05		0	0	>100		0	0	0			
02/28/06		0	0	NODI		0	0	0			
05/31/06		0	0	>100		0	0	0			
08/31/06		0	0	>100		0	0	0			
11/30/06		0	0	NODI		0	0	0			

Process Schematic Diagram

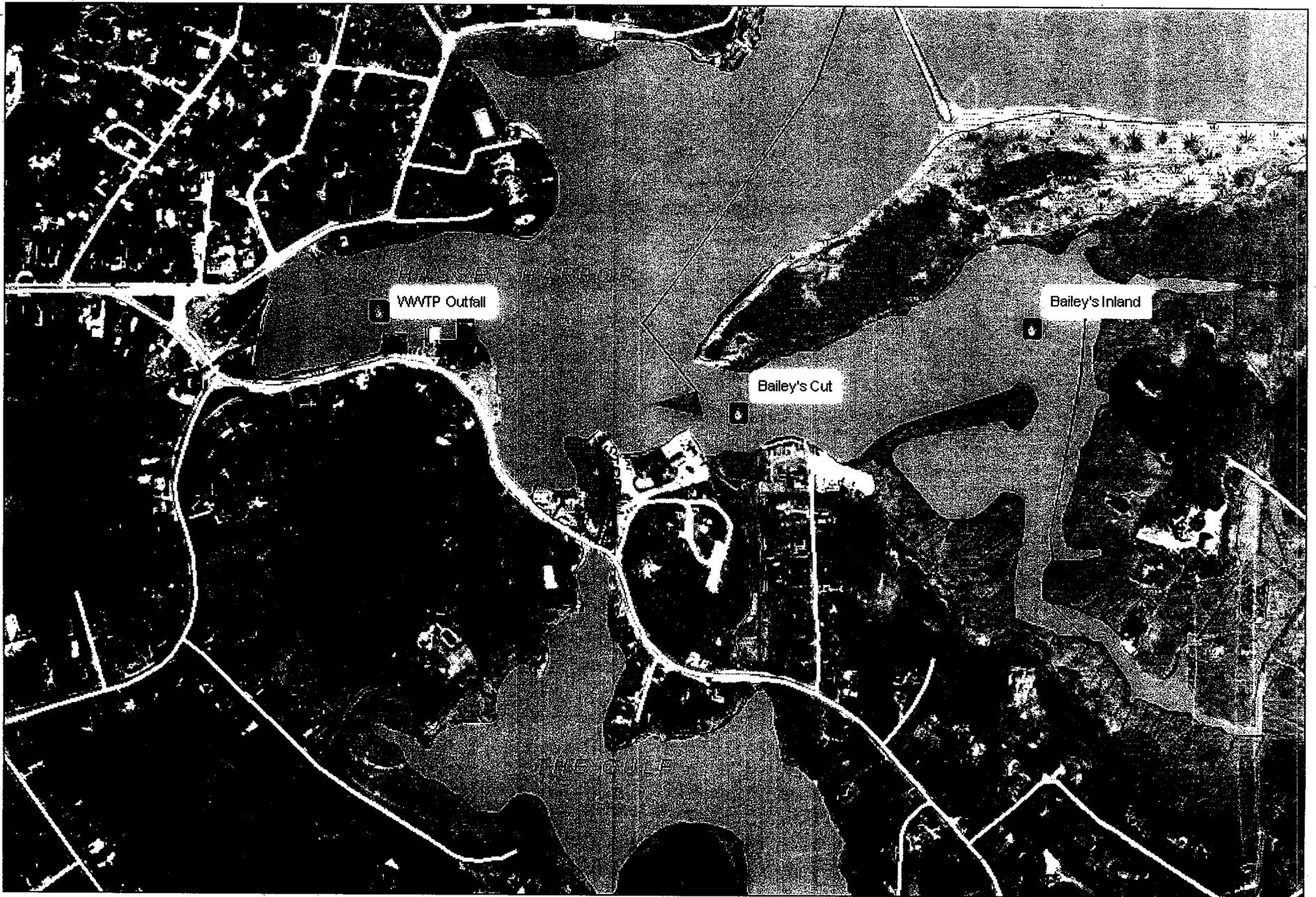


27

WASTEWATER FACILITY PLAN SUPPLEMENT

**COUGHLIN
ENVIRONMENTAL
SERVICES, LLC**

CONSULTING ENGINEERS AND PLANNERS
62 Montvale Avenue
Stoneham, MA 02180-3637
Phone: (781) 832-1002
Fax: (781) 439-9654
Email: coughlineenvr@comcast.net



Cohasset Harbor, Cohasset MA

FACT SHEET ATTACHMENT C

