UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
ONE CONGRESS STREET
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.: MA0102873

NAME AND ADDRESS OF APPLICANT:

**Salisbury Sewer Commission**
**Elm Street**
**Salisbury, MA 01950**

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

**Salisbury Sewer Commission**
**Elm Street**
**Salisbury, MA 01950**

RECEIVING WATER: **a tidal Creek to the Merrimack River (Merrimack River Basin and Coastal Drainage Basin)**

CLASSIFICATION: **SA**

## I. *Proposed Action*

The above named applicant has requested that the U.S. Environmental Protection Agency (EPA) reissue its National Pollutant Discharge Elimination System (NPDES) permit to discharge into the designated receiving water.

The existing NPDES permit was issued on February 21, 2002 and expired on February 21, 2007. The applicant submitted a complete application for permit reisssuance on August 21, 2006 therefore, the existing permit will be administratively extended and continue in effect until the new permit is issued, according to 40 CFR 122.21.

## II. *Type of Facility and Discharge Location*

The facility is an advanced wastewater treatment plant with seasonal nitrification. It serves approximately 5000 people and treats municipal wastewater only. The draft permit has been written to reflect the current operations and conditions at the facility and authorizes a discharge from Outfall 001 to a tidal creek that flows to the Merrimack River.

## III. *Description of Discharge*

A quantitative description of the facility's discharge in terms of significant effluent parameters based on recent monitoring data between January 1, 2006 and March 1, 2007, is shown in Table 1 of this fact sheet.

Figure 1 of the fact sheet is a map showing the geographic location of the facility and Figure 2 is a diagram of the facility's treatment process.

## IV. *Limitations and Conditions*

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

## V. *Permit Basis and Explanation of Effluent Limitation Derivation*

The Town of Salisbury operates the 1.3 million gallons per day (MGD) wastewater treatment facility, which was built in 1987. The collection system is 100 percent sanitary sewers. The treatment train consists of an aerated lagoon system followed by rapid sand infiltration and ultraviolet disinfection. There are seventeen pump stations in Salisbury; all are operated and maintained by the Town.

Sludge is digested aerobically, stabilized with lime, then trucked off-site for incineration.

***POTW Discharges***

***Overview of Federal and State Regulations***

***General Requirements***

EPA is required to consider technology and water quality requirements when developing permit effluent limits. Technology based treatment requirements represent the minimum level of control that must be imposed under Sections 402 and 301(b) of the Clean Water Act (CWA), see 40 CFR 125 Subpart A. For publicly owned treatment works (POTWs), technology based requirements are effluent limitations based on secondary treatment as defined in 40 CFR Part 133.

EPA regulations require NPDES permits to contain effluent limits more stringent than technology-based limits where more stringent limits are necessary to maintain or achieve federal or state water quality standards.

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 requirements for the regulation and control of toxic constituents and also require that EPA criteria, established pursuant to Section 304(a) of the CWA, shall be used unless a site specific criterion is established. The state will limit or prohibit discharges of pollutants to surface waters to assure that surface water quality standards of the receiving waters are protected and maintained, or attained.

The permit must limit any pollutant or pollutant parameter (conventional, non-conventional, toxic, and whole effluent toxicity) that is or may be discharged at a level that caused, has reasonable potential to cause, or contribute to an excursion above any water quality criterion. An excursion occurs if the projected or actual in stream concentrations exceed the applicable criterion.

In determining reasonable potential, EPA considers: (1) existing controls on point and non-point sources of pollution; (2) pollutant concentration and variability in the effluent and receiving water as determined from the permittee's most recent permit application, discharge monitoring reports and State Water Quality reports, (3) sensitivity of the species to toxicity testing, (4) statistical approach outlined in Technical Support Document for Water Quality-based Toxics Controls, (USEPA ,1991) in Section 3 and, where appropriate, (5) 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 requirement of the CWA. EPA's anti-backsliding provisions, found in Section 402(o) of the CWA and 40 CFR 122.44(l), generally prohibit the relaxation of permit limits, standards, and conditions. Therefore, the effluent limits

in a reissued permit must be at least as stringent as those of the previous permit except under certain limited circumstances defined in Section 402(o) of the CWA and 40 CFR Part 122.44(l).

## III. *Water body Classification and Usage*

The classification of the receiving water has changed in the draft permit from SB to SA. The facility discharges to an unnamed tidal creek as noted in Section II. Type of Facility and Discharge Location of this fact sheet. The unnamed tidal creek where the final effluent is discharged is not listed in 314 CMR 4.05, Classes and Criteria in the Massachusetts State Water Quality Standards. Unlisted waters are covered in 314 CMR 4.06(4) which require unlisted coastal and marine waters be classified as SA and presumed High Quality Waters.

### *Flow*

Federal regulations at 40 CFR122.45(b)(i) require that effluent limits be calculated based on design flow of the facility. The design flow rate of this treatment facility is 1.3 MGD. The flow limit will remain the same as in the existing permit and shall be measured continuously. The permittee shall report the annual average flow using the annual rolling average method noted in Footnote 2 of the draft permit. The monthly average flow recorded for the period of January 2005 through March 2007 ranged between 0.51 MGD and 1.35 MGD and the annual average flow ranged between 0.61MGD and 0.70 MGD.

### *Available Dilution*

Water quality limits in the draft permit are based on water quality criteria and the available dilution during 7Q10 low flow conditions in the receiving stream at or near the point of discharge. The 7Q10 is the lowest observed mean river flow for seven consecutive days recorded over a ten year recurrence interval. For rivers and streams, Title 314 CMR 4.03(3)(a) requires that the 7Q10 be used to represent the critical hydrologic conditions at which water quality must be met.

At times during the summer, stream flow in the tidal creek may be minimal such that during low flow periods the effluent may discharge to a wetland. As a result, there is no stream flow to provide dilution when the discharge is at low tide. Therefore, a dilution factor of 1 is used for water quality based effluent limits in the draft permit; the same dilution factor used in the current permit. Limits based on numeric water quality criteria are equivalent to the criteria when the dilution factor is one.

### *Biochemical Oxygen Demand ($BOD)_5$ and Total Suspended Solids (TSS)*

The $BOD_5$ and TSS effluent limits shall remain the same as in the existing permit. The limits are more stringent than secondary requirements found at 40 CFR Part 133. They are based on the 1979 facilities planning study and subsequent environmental impact report that were prepared when the facility was designed.

A review of $BOD_5$ and TSS data submitted on the monthly discharge monitoring reports showed no exceedances for either parameter between January 2005 and January 2007. The permittee reported meeting the 85% removal requirement for $BOD_5$ and TSS for the last several years.

### *Dissolved Oxygen (DO)*

A dissolved oxygen limitation of 6.0 mg/l is in the draft permit. This limit is included to ensure that the discharge does not cause or contribute to a violation of the Massachusetts Surface Water Quality Standards, 314 CMR 4.05 (4)(b)(1). The water quality standards require that the dissolved oxygen concentration in Class SA water shall not be less than 6.0 mg/l unless background conditions are lower. A monitoring frequency of once per day is in the draft permit.

Monthly monitoring data is not available at this time because the existing permit does not have a dissolved oxygen limitation. Limited data on dissolved oxygen from the facility's toxicity tests indicate that the final effluent will meet this requirement.

***pH***

The draft permit established pH limitations based on State Water Quality Standards. The State's standards are more stringent than the pH limitations set forth in 40 C.F.R. 133.102. In accordance with 314 CMR 4.05(4)(a)(3), the pH for Class SA waters shall be in the range of 6.5 through 8.5 standard units and not more than 0.2 standard units outside the background range. There shall be no change from background conditions that would impair any use assigned to this Class. The frequency of monitoring is once per day. The pH data submitted for the period from January 2005 through January 2007 shows occasional violation of the minimum pH level.

***Bacteria limits, Fecal Coliform, and Enterococci***

The fecal coliform limits in the draft permit are the same as those in the existing permit. The existing permit contains a monthly average geometric mean limit of 50 organisms/100 ml, a weekly average geometric mean limit of 75 organisms/100 ml and, a maximum daily limit of 100 organisms/100 ml. These limits were established to minimize impacts on water quality conditions in the receiving water and are based on the 1979 facilities plan and subsequent environmental reports.

The permittee reported no exceedances for fecal coliform between January 2005 and March 2007.

In addition to the fecal coliform limits, the draft permit includes effluent limits for enterococci based on promulgated federal water quality criteria established to protect primary contact recreational uses (see 40 CFR 131 dated November 2004). MassDEP has adopted the same numeric criteria for enterococci in its water quality standards. The federal criteria will be withdrawn upon EPA approval of the state criteria.

The criteria require that no single enterococci sample exceed 104 colonies per 100 ml and that geometric mean of all samples taken within the most recent six months based on a minimum of five samples shall not exceed 35 enterococci colonies per 100 ml in non-bathing beaches. The draft permit has a monthly average limit of 35 enterococci colonies per 100 ml and a maximum daily limit of 104 colonies per 100 ml. The draft permit includes a compliance schedule of one year to attain the new enterococci limit.

***Toxic Pollutants***

EPA is required to limit any pollutant that is or may be discharged at a level that caused, or has reasonable potential to cause, or contribute to an excursion above any water quality criterion. See 40 CFR §122.44(d) (1) (VI). Data submitted with the permit renewal application and previous monitoring data were compared to possible effluent limitations to determine if there is a reasonable potential to cause or contribute to a violation of water quality.

The calculations for toxic metals were based on the EPA National Recommended Water Quality Criteria: 2002 (EPA-822-R-02-047), as adopted in the Massachusetts Water Quality Standards 314 CMR 4.05(5)(e).

***Metals***

Certain metals in waters can be toxic to aquatic life. There is a need to limit toxic metal concentrations where the discharge has the reasonable potential to cause or contribute to an exceedance of water quality standards. The limitations for toxic metals are based on the EPA National Recommended Water Quality

Criteria: 2002 (EPA-822-R-02-047), as adopted in the Massachusetts Water Quality Standards 314 CMR 4.05(5)(e).

***Copper***

The current permit has a maximum daily reporting requirement for copper levels in the effluent. The range reported between January 2005 and January 2007 were between 7 ug/l and 26 ug/l. For marine water, the acute water quality criteria for copper is 4.8 ug/l and the chronic criteria is 3.1 ug/l
This indicates there is reasonable potential that levels in the effluent will exceed water quality criteria.

Average monthly limit = 3.1 ug/l  Maximum daily limit = 4.8 ug/l

The draft permit includes a two year compliance schedule for meeting the monthly average and maximum daily copper limit. See Section E in the draft permit. If, prior to the required compliance date the permittee believes it can reliably achieve the effluent limitation in the permit, it shall notify EPA on its monthly discharge monitoring report, and the final limit will go into effect on the first day of the month following notification.

***Nutrients***

Nutrients are compounds containing nitrogen and phosphorus. Although nitrogen and phosphorus are essential for plant growth, high concentrations of either can cause eutrophication, a condition in which aquatic plant and algal growth is excessive. Plant and algae respiration and decomposition reduces oxygen concentrations in the water, creating poor habitat for fish and other aquatic animals. Nitrogen in the form of ammonia can be toxic to aquatic life, and can also deplete dissolved oxygen in the receiving water due to dissolved oxygen used in the breakdown of ammonia to nitrate/nitrite

The effluent from the Salisbury facility discharges to a marine water. The toxicity level of ammonia is based on the salinity, temperature and pH of the receiving water (USEPA 1999).

***Ammonia -Nitrogen***

The seasonal effluent limitations and reporting requirements for ammonia-nitrogen in the current permit are based on achieving the water quality standards for dissolved oxygen and have remained unchanged in the draft permit. The seasonal limits from May 1 through October 31 are 5 mg/l for the average monthly limit, 7 mg/l for the weekly average limit and, 10 mg/l for the maximum daily limit; ammonia-nitrogen monitoring and reporting are required for the remainder of the year

There were several exceedances reported between May 2005 and October 2006. See Table 2 below for ammonia levels in the effluent between January 2006 and January 2007.

Table 2

| **Date** | **Average Monthly Ammonia, mg/l** | **Average Weekly Ammonia, mg/l** | **Max. Daily Ammonia, mg/l** |
|---|---|---|---|
| January 2007 | 16.3 | 1.8 | 1.9 |
| December 2006 | 13.7 | 0.9 | 1.2 |
| November 2006 | 7.8 | 10.7 | 10.7 |
| October 2006 | 1.3 | 3.0 | 3.0 |
| September 2006 | 1.0 | 2.1 | 2.1 |
| August 2006 | 0.9 | 1.1 | 1.1 |
| July 2006 | 0.8 | 1.0 | 1.0 |
| June 2006 | 5.3 | 7.7 | 7.7 |
| May 2006 | 10.1 | 15.9 | 15.9 |

| | | | |
|---|---|---|---|
| April 2006 | 12.5 | 13.8 | 13.8 |
| March 2006 | 8.3 | 9.2 | 9.2 |
| February 2006 | 11.1 | 13.3 | 13.3 |
| January 2006 | 14.5 | 13.8 | 13.8 |

The draft permit includes a reporting requirement for the concentration and mass levels of total nitrite, total nitrate and Total Kejdahl Nitrogen.

To determine if cold weather ammonia limits were necessary during this permit reissuance, the EPA reviewed the Ambient Water Quality Criteria for Ammonia (Saltwater) -1989, USEPA 440/66/004. Instream data on the pH, temperature and salinity of the receiving water were needed to determine ammonia criteria. In this case, the location of the final discharge is inaccessible, therefore the Agency assumed the following conditions of the receiving water as required in the ambient criteria document stated above,USEPA 440/66/004 ; a pH of 7.0 (typical of marine water), a salinity of 10g/kg (the discharge is located in a estuary) and a range of the receiving water temperature between $0^0$ C and $10^0$ C. Based on these parameters, the acute criteria range for total ammonia is between 191 and 270 mg/l, and the chronic criteria would be between 29 and 41. Both the acute and chronic criteria are above levels in the effluent so winter ammonia limits in the permit are not needed at this time.

***Whole Effluent Toxicity Testing***

Under Section 301(b)(1) of the CWA, discharges are subject to effluent limitations based on water quality standards. The Massachusetts Surface Water Quality Standards [314 CMR 4.05(5)(e)], include the following narrative statements and require that EPA criteria established pursuant to Section 304(a)(l) 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. Where the State determines that a specific pollutant not otherwise listed in 314 CMR 4.00 could reasonably be expected to adversely affect existing or designated uses, the State shall use the recommended limit published by EPA pursuant to 33 U.S.C. 1251 §304(a) as the allowable receiving water concentrations for the affected waters unless a site-specific limit is established. Site specific limits, human health risk levels and permit limits will be established in accordance with 314 CMR 4.05(5)(e)(1)(2)(3)(4).*"

National studies conducted by the EPA have demonstrated that domestic sources contribute toxic constituents to POTWs above those which may be contributed from industrial users. These pollutants include metals, chlorinated solvents, aromatic hydrocarbons and other constituents. EPA Region I 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, and in accordance with EPA regulations and policy, the draft permit includes chronic and acute toxicity limitations and monitoring requirements. (See, e.g. Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants", 50FR30784 (July 25, 1985); see also EPA Technical Support Document for Water Quality-Based Toxics Control," (EPA/505/2-90-001, September 1991).

The principal advantages of biological techniques are: (1) the effects of complex discharges of many known and unknown constituents can be measured only by biological analysis; (2) bioavailability of pollutants after discharge is measured by toxicity testing including any synergistic effect of pollutants;

and (3) pollutants for which there are inadequate analytical methods or criteria can be addressed. Therefore, toxicity testing is being used in connection with pollutant-specific control procedures to control the discharge of toxic pollutants.

The Massachusetts Water Quality Standards Implementation Policy for the Control of Toxic Pollutants in Surface Waters (February 23, 1990) requires 7-day chronic and modified acute toxicity testing four times per year for discharges having a dilution factor of less than 10.

The $LC_{50}$ limit remains at 100% based on the Massachusetts Implementation Policy.

The chronic no observed effect concentration (C-NOEC) whole effluent toxicity limit is calculated using the instream waste concentration (IWC) of the effluent. The IWC is the inverse of the dilution.

C-NOEC = 1/ dilution factor = 1/1 = 1.0 = 100 %

This is the same limit that is in the existing permit.

The draft permit will continue to require testing one specie only, the inland silverside, *Menidia beryllina.* The tests results for the last two years are shown in (Table 4) and are within the permit limits. The toxicity test schedule has been changed from what is in the current permit. Testing is currently done in March, June, September and December but the draft permit requires the test be conducted in the second week of January, April, July and October. See page 5 of the draft permit. EPA and MassDEP require all facilities discharging into the Merrimack Watershed to use this schedule in an effort to determine the collective impact to the watershed. See Permit **Attachment A,** Freshwater Chronic Toxicity Test Procedure and Protocol, for a description of the testing requirements.

## VI. *Unauthorized Discharges*

The permittee is not authorized to discharge wastewater from any pump station emergency overflow. Overflows, including sanitary sewer overflows (SSOs), must be reported in accordance with reporting requirements found in Part II. General Requirements, Section D.1.e. of the permit (24-hour reporting). If a discharge does occur, the permittee must notify the EPA, the MassDEP, and others, as appropriate (i.e. local Public Health Department), both orally and in writing as specified in the draft permit.

## VII. *Operation and Maintenance of the Sewer System*

The Town of Salisbury owns, operates and maintains the sewer collection system that transports sewage to the treatment plant.

### *Infiltration/Inflow Requirements*

The draft permit includes requirements for the permittee to control infiltration and inflow (I/I). Infiltration is groundwater that enters the collection system though 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 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' as 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 a reasonable likelihood of adversely effecting human health or the environment. EPA and MassDEP maintain that an I/I removal program is an integral component to insuring permit compliance under both of these provisions.

MassDEP has stated that inclusion of the I/I conditions in the draft permit shall be a standard State Certification requirement under Section 401 of the Clean Water Act and 40 CFR 124.55(b).

**VIII.** ***Pretreatment***

The facility does not treat pollutants from major industrial facilities. Pollutants introduced into the POTW by a nondomestic source shall not enter the POTW or interfere with the operation or performance of the works.

**IX.** ***Sludge Information and Requirements***

Section 405(d) of the Clean Water Act requires that sludge conditions be included in all POTW permits. The sludge conditions in the draft permit satisfy this requirement and are taken from EPA's Standard for the disposal of sewage sludge (40 CFR 503). Attachment B of the permit is the Sludge Compliance Guidance and provides guidance on sewage sludge use and disposal practices.

In an effort to improve nitrification, the permittee had sludge dredged from the lagoons in 2003 and 2005. Prior to 2003, the lagoons had never been dredged. The Town's budget for the plant now includes dredging for the lagoons every two years. The sludge is transported offsite to Synagro/NETCO in Woonsocket, RI for incineration.

**X.** ***Essential Fish Habitat (EFH)***

Under the 1996 Amendments (PL 104-267) to the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C.§ 1801 et seq. (1998)), EPA is required to consult with National Marine Fisheries Service (NMFS) if EPA's action or proposed actions that it 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 waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity. 16 U.S.C.§ 1802(10). Adverse impact 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.

Essential fish habitat is only designated for fish species for which Federal Fisheries Management Plans exist. 16 U.S.C.§ 1855(b)(1)(A). The U.S. Department of Commerce on March 3, 1999 approved EFH designations for New England.

A review of the relevant essential fish habitat information provided by NMFS indicated that Essential Fish Habitat does not exist in the vicinity of the proposed discharge.

EPA has determined that a formal EFH consultation with NMFS is not required because the proposed discharge will not adversely impact EFH.

**XI.** ***Endangered Species Act***

Section 7(a) of the Endangered Species Act of 1973, as amended (ESA) grants authority to and imposes requirements upon Federal agencies regarding endangered or threatened species of fish, wildlife, or plants ("listed species") and habitat of such species that has been designated as critical (a "critical

habitat"). The ESA requires every Federal agency, in consultation with and with the assistance of the Secretary of Interior, to insure that any action it authorizes, funds, or carries out, in the United States or upon the high seas, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. The United States Fish and Wildlife Services (USFWS) administers Section 7 consultations for fresh water species, where as the National Marine Fisheries Services (NMFS) administers Section (7) consultations for marine species and anadromous fish.

EPA believes the authorized discharge from this facility is not likely to adversely affect any federally-listed species, or their habitats. This preliminary determination is based on the location of the outfall, and the reasons provided in the EFH discussion (Section X of this fact sheet). EPA is seeking concurrence with this opinion from NOAA Fisheries and the USFWS through the informal ESA consultation process.

**XII.** ***State Certification Requirements***

The staff of the State Water Pollution Control Agency 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.** ***Public Comment Period, Hearing Requests and Procedures for Final Decision***

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 U.S.EPA, Massachusetts Office of Ecosystem Protection (CMA), One Congress Street- Suite 1100, Boston, Massachusetts 02114-2023. 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 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 and MA DEP Contacts***

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:

Betsy Davis
US Environmental Protection Agency
1 Congress Street
Suite 1100 (CPE)
Boston, Massachusetts 02114-2023
Telephone: (617) 918-1576

or

Paul Hogan
MA Department of Environmental Protection
Division of Watershed Management
627 Main Street
Worcester, MA 01608
Telephone: (508) 767-2796

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

Date:

**Attachment A of the Fact Sheet**
**Salisbury Wastewater Treatment Plant**
**Summary of NPDES Permit Reporting Requirements Dates**

| **Permit Page** | **Requirement and Dates** | **Submit to:** |
|---|---|---|
| 5 | Whole Effluent Toxicity Tests results are due April 30, July 31, October 30 and January 31. | EPA/MassDEP |
| 7 | The permittee shall develop and implement a plan to control I/I to the separate sewer system. The plan shall be submitted to EPA and MassDEP six months from the effective date of the permit. See Part 1.C.3. | EPA/MassDEP |
| 8 | A summary report of all actions taken to minimize I/I during the previous calendar year shall be submitted to EPA and the MassDEP annually by the permittee by the anniversary date of the effective date of the permit | EPA/MassDEP |
| 10 | The permittee shall submit an annual report containing the information specified in the sludge section of the permit by February 19. | EPA/MassDEP |
| 10 | Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report Form(s) postmarked no later than the 15$^{th}$ day of the month following the effective date of the permit. | EPA/MassDEP |