Attachment 5

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

MAY - 2 2014

Mr. Neil J. Harrington
Town Manager
Town of Salisbury
5 Beach Road
Salisbury, MA 01952

Re: In the Matter of Town of Salisbury, Massachusetts
Administrative Order Docket No. 11- 012

Dear Mr. Harrington:

EPA has reviewed two reports submitted pursuant to the above referenced Administrative Order (Order) by the Town of Salisbury (Town), the Ammonia Nitrogen Removal Engineering Report dated February 2012 and the Copper Optimization Engineering Report dated January 2013. The reports were prepared for the Town by Weston & Sampson Engineers.

Effluent from the Town's wastewater treatment plant discharges to a tidal creek that provides negligible dilution. As a result the Town's National Pollutant Discharge Elimination System (NPDES) permit (MA0102873) has very stringent limits for ammonia nitrogen and copper which the Town has frequently violated. The Order required, among other things, that the Town evaluate the feasibility of relocating the treatment plant outfall to a location providing greater effluent dilution, which may justify less stringent effluent limits. The reports note that extending the outfall would require construction in a wetland area, which would involve a lengthy and complicated permitting process, and suggest that by only discharging during certain portions of the tidal cycle when there is flow in the creek the Town may be able to obtain greater dilution. The reports point out that the treatment plant was originally designed to operate in a tidal discharge mode, which should make implementation of this option much easier. The reports recommend that an engineering study be done to determine the available dilution, either by tracer studies or with a mathematical model of the creek, and evaluate what modifications to the treatment plant will be needed to operate in a tidal discharge mode.

EPA concurs with the recommendation to evaluate use of a tidal discharge system to obtain additional dilution. **By August 1, 2014** the Town shall submit to EPA and the Massachusetts Department of Environmental Protection (MassDEP) for review and approval a detailed scope of work (SOW) for the above engineering study. The SOW shall include a detailed description of

how the available dilution will be estimated for a range of hydrologic conditions (i.e., river flows and tidal heights) and treatment plant flows. It shall include determination of the available effluent storage at the plant, and evaluation of the maximum flows that can be held for tidal discharge. It shall also evaluate the possibility of smoothing out diurnal and day-to-day flow variations. If it appears that a tidal discharge scheme will provide sufficient dilution to avoid possible ammonia or copper toxicity in the receiving stream, it shall evaluate necessary modifications to the treatment plant, including a cost estimate and proposed implementation schedule. If the study concludes that a tidal discharge is not a viable option, it shall recommend other measures to enable the Town to achieve compliance with its NPDES permit limits.

If you have any questions regarding this letter or the required Scope of Work, please contact George Harding, P.E., of my staff at 617/918-1870.

Sincerely,

Denny Dart

Denny Dart, Manager
Water Enforcement Unit
Office of Environmental Stewardship

cc w/enc: Kevin Brander, MassDEP NERO
√Jeff Ingalls, Salisbury Wastewater Treatment Facility
Chris Perkins, Weston & Sampson
Betsy Davis, OEP