United States Environmental Protection Agency
Region I - New England

IN THE MATTER OF	)	DOCKET NO. 08-042
City of Taunton, Massachusetts NPDES Permit No. MA0100897	)	FINDINGS OF VIOLATION
	)	AND
Proceedings under Section 309(a)(3) of the Clean Water Act, as amended, 33 U.S.C. §1319(a)(3)	)	ORDER FOR COMPLIANCE

I. STATUTORY AUTHORITY

The following Findings are made and ORDER issued pursuant to Sections 308(a) and 309(a)(3) of the Clean Water Act, as amended (the "Act"), 33 U.S.C. §§ 1318 and 1319(a)(3). Section 309(a)(3) of the Act grants to the Administrator of the U.S. Environmental Protection Agency ("EPA") the authority to issue orders requiring persons to comply with Sections 301, 302, 306, 307, 308, 318 and 405 of the Act and any permit condition or limitation implementing any of such sections in a National Pollutant Discharge Elimination System ("NPDES") permit issued under Section 402 of the Act, 33 U.S.C. § 1342. Section 308(a) of the Act, 33 U.S.C. § 1318(a), authorizes EPA to require the submission of any information required to carry out the objectives of the Act. These authorities have been delegated to EPA Region I's Administrator, and in turn to the Director of EPA, Region I's Office of Environmental Stewardship ("Director").

The Order herein is based on findings of violation of Section 301 of the Act, 33 U.S.C. § 1311, and the conditions of NPDES Permit No. MA0100897. Pursuant to Section 309(a)(5)(A) of the Act, 33 U.S.C. § 1319(a)(5)(A), the Order provides a schedule for compliance which the Director has determined to be reasonable.

II. DEFINITIONS

Unless otherwise defined herein, terms used in this Order shall have the meaning given to those terms in the Clean Water Act, 33 U.S.C. § 1251 *et. seq.*, the regulations promulgated thereunder, and any applicable NPDES permit. For the purposes of this Order, "NPDES Permit" means the City of Taunton's (the "City" or the "Permittee") NPDES Permit No. MA0100897, and all amendments or modifications thereto and renewals thereof as are applicable, and in effect at the time.

III. FINDINGS

The Director of the Office of Environmental Stewardship makes the following findings of fact:

1. The City of Taunton, Massachusetts is a municipality, as defined in Section 502(4) of the Act, 33 U.S.C. § 1362(4), established under the laws of the Commonwealth of Massachusetts.
2. The City is a person under Section 502(5) of the Act, 33 U.S.C § 1362(5). The City is the owner of a publicly-owned wastewater treatment works, including a wastewater treatment facility (the "Facility"), and a wastewater collection system (the "Collection System") from which it discharges pollutants, as defined in Section 502(6) and (12) of the Act, 33 U.S.C. § 1362(6) and (12), from point sources as defined in Section 502(14) of the Act, 33 U.S.C. § 1362(14), including a combined sewer overflow outfall (the "CSO outfall"), to the Taunton River. The Taunton River flows into Mount Hope Bay, which in turn flows into Narragansett Bay. All are waters of the United States as defined in 40 C.F.R. § 122.2 and navigable waters under Section 502(7) of the Act, 33 U.S.C.§ 1362(7).
3. On September 19, 2001, the City was issued NPDES Permit No. MA0100897 by the Director of the Office of Ecosystem Protection of EPA, Region I, under the authority given to the Administrator of EPA by Section 402 of the Act, 33 U.S.C. § 1342. The Permit became effective on September 19, 2001.

4. The NPDES Permit authorizes the Permittee to discharge pollutants from the Facility's Discharge Serial Number 001 and the CSO outfall (Discharge Serial Number 004) to the Taunton River, subject to the effluent limitations, monitoring requirements and other conditions specified in its NPDES Permit.

5. Section 301(a) of the Act, 33 U.S.C. § 1311(a), makes unlawful the discharge of pollutants to waters of the United States except in compliance with, among other things, the terms and conditions of a NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.

6. Without authorization to do so, since March 23, 2004, the City has periodically discharged untreated sewage to the Taunton River and its tributaries from various components of the Collection System other than the CSO outfall.

7. The various components of the Collection System from which the City has discharged untreated sewage to the Taunton River and its tributaries are point sources as defined in Section 502(14) of the Act, 33 U.S.C. § 1362(14).

8. The Taunton River and its tributaries, to which the City has discharged untreated sewage without authorization to do so, are "waters of the United States" as defined in 40 C.F.R. § 122.2 and "navigable waters" as defined by Section 502(7) of the Act, 33 U.S.C. § 1362(7).

9. Untreated sewage contains pollutants as defined in Sections 502(6) and (12) of the Act, 33 U.S.C. §§ 1362(6) and (12).

10. The City's unauthorized discharges of pollutants to the Taunton River and its tributaries from components of the Collection System have occurred in violation of Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a).

IV. ORDER

Accordingly, pursuant to Section 309(a)(3) of the Clean Water Act, it is hereby ordered that:

Combination Manholes

1. Within three (3) months of receipt of this Order, the City shall submit a plan for monitoring the combination manholes in the Collection System to determine whether the transfer of sanitary wastewater or storm water from the sanitary sewer to the storm drain or from the storm drain to the sanitary sewer occurs. The City shall implement the monitoring plan within ten (10) months of approval of the plan by the EPA and the MassDEP. The City shall create a log for the inspection of each combination manhole noting the following information:
   a. combination manhole identification number;
   b. date and time of the inspection;
   c. date and time that the monitoring mechanism was set or reset; and
   d. the duration and intensity of the storm event that immediately preceded the inspection.

   The monitoring plan shall provide for inspections of each combination manhole within 96 hours of the end of two, separate and distinct storm events that exceed one inch in a 24-hour period. The results of all inspections shall be included in the aforementioned log. The inspection log shall highlight in bold all combination manholes indicating evidence of the transference of sewage to a storm drain or transference of storm water to the sanitary sewer.
2. Within twelve (12) months of receipt of this Order, the City shall identify and inspect all combination manholes in the Collection System, and shall submit a report providing the location and a description of each manhole (the "Combination Manhole Report") to EPA and the MassDEP. For each combination manhole, the report shall include:
   a. the street address;
   b. a distinct identification number;
   c. a description or schematic of the control system within the manhole, including relative elevations of sewer and storm drain

inverts, diameter of sewer and storm drain pipes, control structures separating pipes (weir walls, covers, etc);

d. a determination of whether the storm sewer served by the combination manhole discharges to a surface water;

e. a description and schematic of the sewer and storm drain entering and leaving the manhole, including proximity of the sewers and storm drains (i.e. over and under in a common trench vs. separate trench construction); and

f. a large scale map or maps including a GIS layer of both the Collection System and the storm water drainage system indicating the location of each combination manhole with the identification number, any other sanitary and storm water connections (e.g. connections other than combination manholes installed to relieve surcharging in either system), water resource areas (i.e. rivers, lakes, wetlands, etc) in the vicinity of the combination manhole, and the location of the outfall of the storm drain served by the combination manhole. The map shall clearly depict the size and direction of flow of all sewers in the Collection System and storm water drainage system and shall distinguish between combined and separate sanitary sewers.

3. In the event that the City identifies more than 120 combination manholes during the conduct of the work required pursuant to Paragraphs IV.1 and IV.2. of this Order, the City may petition EPA and the MassDEP to modify the monitoring program submitted pursuant to Paragraph IV.1. of this Order.

4. Within twenty-four (24) months of receipt of this Order, the City shall submit to EPA and the MassDEP a report presenting the results of the monitoring undertaken in accordance with the approved plan and containing an action plan for construction activities necessary to prevent transfer between the sanitary and storm sewers (Combination Manhole Action Plan").

5. The Combination Manhole Action Plan shall include a schedule for the initiation and completion of measures that will be implemented to completely separate those combination manholes at which transfer of flows between systems occurs, or otherwise modify those combination manholes, in order to prevent such transfer.

6. The schedules included in the Combination Manhole Action Plan shall be incorporated and enforceable hereunder upon their approval by, and as amended by, EPA and the MassDEP.

7. Beginning January 1, 2011, and annually thereafter, the City shall monitor all combination manholes, except those combination manholes that have been previously completely separated, once per year within 96 hours following a rainfall event of two inches or greater within a 24-hour period. For all combination manholes indicating evidence of the transference of sewage to a storm drain or transference of storm water to the sanitary sewer, the City shall, within one year of the monitoring conducted pursuant to this paragraph, either completely separate the combination manhole or otherwise modify the combination manhole in order to control unauthorized discharges of sanitary sewage to the storm drain or storm water to the sanitary sewer.

8. Beginning in 2012, and annually thereafter, the City shall include as a separate section of the annual Infiltration & Inflow ("I/I") Report required by its NPDES Permit, a report summarizing the results of its combination manhole monitoring, including any work done to completely separate the combination manholes or otherwise modify the combination manholes in order to control unauthorized discharges of sanitary sewage to the storm drain or storm water to the sanitary sewer for the previous calendar year.

9. All discharges of separate sanitary sewage to storm water drains or directly to waters of the United Sates are prohibited. In the event of a discharge from a separate sanitary sewer to the storm drain system, the City shall notify EPA and the MassDEP pursuant to the requirements of the NPDES Permit.

Collection System

10. By March 31, 2009, the City shall complete and submit to the EPA and the MassDEP, an assessment of its entire Collection System capacity and its operation and maintenance practices (the "CMOM Program Self-Assessment"). As part of the CMOM Program Self-Assessment, the City shall complete and submit the Wastewater Collection System Capacity, Management, Operation, and Maintenance Program Self-Assessment Checklist (the "CMOM Program Self-Assessment Checklist"), which is appended **(Attachment No. 1).**

11. By July 31, 2009, the City shall submit to the EPA, and the MassDEP, a plan (the "CMOM Corrective Action Plan") that shall include the following:

    a. a list of any deficiencies identified by the CMOM Program Self-Assessment;

    b. a list of causes and contributing factors that lead to the unauthorized discharges identified in the CMOM Program Self-Assessment Checklist;

    c. a description of the specific short and long-term actions that the City is taking, or plans to take, in addition to those measures required by this Order, to address any of the deficiencies identified during the completion of the CMOM Program Self-Assessment Checklist; and

    d. a schedule for implementation of the CMOM Corrective Action Plan (the "CMOM Corrective Action Plan Implementation Schedule").

12. The CMOM Corrective Action Plan Implementation Schedule submitted pursuant to Paragraph IV.11. of this Order shall be incorporated and enforceable hereunder upon the CMOM Corrective Action Plan Implementation Schedule's approval by, and as amended by, EPA, whereupon the City shall implement the CMOM Corrective Action Plan.

13. By December 31, 2009, the City shall complete the cleaning of the entire Collection System that it initiated in August 2006.

14. By December 31, 2009, the City shall complete television inspection of at least 124,000 feet of sewer pipe in the "Core Area"[1].

15. By December 31, 2010, the City shall complete television inspection of at least an additional 124,000 feet of sewer pipe in the Core Area.

16. By December 31, 2011, the City shall complete television inspection of the entire Collection System in the Core Area and all out-lying areas for those sewers that were constructed prior to January 1, 1970.

17. The City may petition the EPA and the MassDEP to exclude from the television inspection requirement any particular sewer segment of the Collection System that the City determines should be so excluded. The petition shall include an explanation that identifies the sewer segment of the Collection System that would not be inspected and the specific reasons why it excluded this sewer segment of the Collection System from the television inspection requirement. The EPA and the MassDEP may accept the petition as submitted, request additional information, or may require that the City televise that sewer segment of the Collection System. EPA and the MassDEP will submit their decision on the Petition in writing to the City including, if necessary, a schedule to complete the work.

Storm Water Drainage System

18. By December 31, 2009, the City shall clean, inspect, and dye test all storm water catch basins and manholes currently identified in the Phase I Core Area as well as those additional catch basins and manholes that are

[1] The City has divided its Collection System into a number of drainage areas that are identified by alphabetic letters on its sewer system map titled "TAUNTON SEWER SUBSYSTEM MAP" and dated September, 2008 (copy attached). The "Core Area" of the Collection System lies generally west of the Taunton River and contains the subareas identified as A, C, D, E, F, G, H, I, J, K, L, M, and P on the sewer map. The Core Area contains 353,000 linear feet of the oldest of the City's sewers that are being found to be responsible for much of the Infiltration & Inflow problems. The Core Area is further delineated into Phase I and Phase II Sections.

identified during the conduct of work required pursuant to Paragraph IV.2. of this Order.

19. By December 31, 2010, the City shall clean, inspect, and dye test all storm water catch basins and manholes identified in the Phase II Core Area.

20. By December 31, 2011, the City shall clean, inspect, and dye test all identified storm water catch basins and manholes that are not in the Phase I or Phase II Core Areas and shall, within three (3) months of the completion of the inspections and testing, submit to EPA and the MassDEP a map or maps indicating the location of all such storm water catch basins and manholes.

21. If the City decides not to inspect and dye test all catch basin or manhole structures, the City shall provide a written explanation identifying each structure not to be inspected and dye tested and the specific reasons why it proposes to not inspect and dye test such structures. The EPA and MassDEP may accept the City's decision as submitted, request additional information about the situation or may require that the City inspect and dye test the structure. The inspection and dye testing of storm water catch basins and manholes is not required in those sections of the City that are not served by the Collection System.

Inflow

22. By April 30, 2009, the City shall submit a report to EPA and the MassDEP that details the previous investigations that have been undertaken within the City to identify and address roof leader and sump pump discharges to the Collection System. This report shall also detail the plan to complete the survey of structures that have not been previously investigated.

23. By December 31, 2009, the City shall complete a survey of all City-owned buildings for illicit roof leader and sump pump discharges to the Collection System and shall, within three (3) months of completion of such survey, submit to EPA and the MassDEP a report that details the results of the

survey and a plan and schedule for addressing such roof leader and sump pump discharges to the Collection System.

24. By April 30, 2010, the City shall complete a roof leader assessment of buildings located within the Phase I Core Area. By July 31, 2010, the City shall submit a report on the findings and recommendations of this survey to EPA and the MassDEP for their review and approval. The report shall also include a discussion of the measures that the City plans to implement to remedy suspected roof leader connections to the Collection System on those properties to which the City was not granted access.

25. By April 30, 2011, the City shall complete a roof leader assessment of buildings located within the Phase II Core Area. By July 31, 2011, the City shall submit a report on the findings and recommendations of this survey to EPA and the MassDEP for their review and approval. The report shall also include a discussion of the measures that the City plans to implement to remedy suspected roof leader connections to the Collection System on those properties to which the City was not granted access. The completion of roof leader assessments of buildings in the Phase I and Phase II Core Areas is not required in those sections of the City that are not served by the Collection System.

26. By June 30, 2012, the City shall complete a City-wide assessment for illicit sump pumps connected to the Collection System in accordance with the plan submitted pursuant to Paragraph IV.22. of this Order. By September 30, 2012, the City shall submit a report on the findings and recommendations of this survey to EPA and MassDEP for their review and approval. The report shall also include a discussion of the measures that the City plans to implement to remedy suspected sump pump connections to the Collection System on those properties to which the City was not granted access.

Reporting

27. The City shall include as part of the annual Infiltration & Inflow ("I/I") Report required by its NPDES Permit, a report summarizing the findings of the investigations performed under the tasks set forth in Paragraphs 13, 14, 15, 16, 18, 19, 20, and 22 of this Order. The I/I Report shall also include recommendations and a schedule for remedying the identified deficiencies and shall list any remedies implemented during the previous calendar year.

28. Beginning in 2010, and annually thereafter, the City shall include as a separate section of the annual I/I Report required by its NPDES Permit a report (the "CMOM Program Implementation Annual Report") detailing the actions taken by the City during the prior calendar year, or known by the City to have been taken by other parties, to resolve the deficiencies identified in the CMOM Corrective Action Plan. The CMOM Program Implementation Annual Report shall also include, at a minimum:

a. A summary listing of all unauthorized discharges that have occurred during the previous calendar year, including Building/Private Property Backups, that result from capacity limitations or blockages in that portion of the Collection System owned by the City. The tabular listing shall be organized chronologically and shall include the date and times on which each event was discovered and was stopped; the location by address; the source of notification (property owner, field crew, police); the causes of the event, including, but not limited to infiltration/inflow, capacity issues, vandalism, sediments, roots, grease, mechanical, electrical and structural failures; the measures taken to stop the SSO and to prevent similar unauthorized discharges from occurring at the same location in the future; the date of the last unauthorized discharge that occurred at the same overflow location; the estimated gallons of wastewater released; and the name of the

receiving water or a description of ultimate discharge location if the unauthorized discharge did not occur to a surface water;

b. A description of the measures and programs implemented by the City to resolve any of the deficiencies identified pursuant to Paragraph IV.10. and IV.11. of this Order and to reduce the frequency, duration and volume of overflows from its Collection System during the previous calendar year, including copies of any contracts signed by the City to address any issues identified in the CMOM Corrective Action Plan, and a description of all of the activities that the City has implemented to measure the effect and success of its efforts.

Combined Sewer Overflow

29. By October 31, 2011, the City shall submit a report to EPA and the MassDEP that includes the following:

a. A summary detailing the progress made to date on the improvements to the Collection System to completely eliminate discharges at the CSO outfall;

b. An evaluation of the City's ability to completely eliminate the CSO outfall based on the Collection System work done to date and future Collection System work planned for 2012 and 2013;

If the City determines that the Collection System measures required by this Order will not result in the elimination of the CSO outfall, then the City shall submit a plan and schedule for the implementation of additional measures (i.e. storage and pump back, generic bypass and high flow management at the treatment plant, etc.) to be performed in conjunction with the Collection System work that will allow it to eliminate the CSO outfall by October 1, 2013. In addition, if the City determines that it is infeasible to eliminate the CSO outfall by October 1, 2013, it shall submit

an additional schedule for eliminating the CSO outfall on the shortest feasible schedule.

V. NOTIFICATION PROCEDURES

1. Where this Order requires a specific action to be performed within a certain time frame, the Permittee shall submit a written notice of compliance or noncompliance with each deadline. Notification must be mailed within fourteen (14) calendar days after each required deadline. The timely submission of a required report shall satisfy the requirement that a notice of compliance be submitted.

2. ~~If noncompliance is reported, notification should include the following~~ information:

   a. A description of the noncompliance;

   b. A description of any actions taken or proposed by the Permittee to comply with the lapsed schedule requirements;

   c. A description of any factors that explain or mitigate the noncompliance; and

   d. An approximate date by which the Permittee will perform the required action.

3. After a notification of noncompliance has been filed, compliance with the past-due requirement shall be reported by submitting any required documents or providing EPA with a written report indicating that the required action has been achieved. Submissions required by this Order shall be in writing and shall be mailed to the following addresses:

US EPA - New England
Office of Environmental Stewardship
1 Congress Street
Suite 1100 (SEW)
Boston, MA 02114-2023
Attn: Steven Couto

MassDEP
20 Riverside Drive
Lakeville, MA 02347
Attn: Jonathan Hobill

VI. GENERAL PROVISIONS

1. This Order does not constitute a waiver or a modification of the terms and conditions of the NPDES Permit. The NPDES Permit remains in full force and effect. EPA reserves the right to seek any and all remedies available under Section 309 of the Act, 33 U.S.C. § 1319, as amended, for any violation cited in this Order.
2. This Order shall become effective upon receipt by the Permittee.

09/26/08
Date

Susan Studlien
Susan Studlien, Director
Office of Environmental Stewardship

Attachment 1, Part B

United States Environmental Protection Agency, EPA New England

Wastewater Collection System CMOM Program Self-Assessment Checklist

April 2008

Name of your system _____ Date _____

Put an "A" in the final column for an issue you intend to address with future action, or leave blank if you have evaluated your program as sufficient.

I. General Information – Collection System Description

I.	Question	Response	Act
1	How many people are served by your wastewater collection system?		
2	What is the number of service connections to your collection system? How many: Manholes? Pump stations? Feet (or miles) of sewer? Force mains? Siphons?		
3	What is the age of your system (e.g., 30% over 30 years, 20% over 50 years, etc.)?		
4	What type(s) of collection system map is/are available and what percent of the system is mapped by each method (e.g., paper only, paper scanned into electronic, digitized, interactive GIS, etc.)? When was the map(s) last updated?		
5	If you have a systematic numbering and identification method/system established to identify sewer system manhole, sewer lines, and other items (pump stations, etc.), please describe.		
6	Are "as-built" plans (record drawings) or maps available and used by field crews in the office and in the field?		
7	Describe the type of asset management (AM) system you use (e.g. card catalog, spreadsheets, AM software program, etc.)		

II. Continuing Sewer Assessment Plan

II.	Question	Response	Act
1	Under what conditions, if any, does the collection system overflow? Does it overflow		

* Put an "A" in the final column if this is an issue you intend to address with future action.

	during wet and/or dry weather? Has your system had problems with: ☐ hydraulic issues, ☐ debris, ☐ roots, ☐ Fats, Oils & Grease (FOG), ☐ vandalism blockages resulting in manhole overflows, ☐ basement backups, ☐ other (specify)? Describe your system's history of structural collapses, and PS or force main failures.		
2	How many SSOs have occurred in each of the last three calendar years? What is the most frequent cause?		
3	Of those SSOs, how many basement backups occurred in each of the last three calendar years? How are they documented?		
4	What is the ratio of peak wet-weather flow to average dry-weather flow at the wastewater treatment plant or municipal boundary for satellite collection systems?		
5	What short-term measures have been implemented or plan to be implemented to mitigate the overflows? If actions are planned, when will they be implemented?		
6	What long-term measures have been implemented or plan to be implemented to mitigate the overflows? If actions are planned, when will they be implemented?		
7	Describe your preventive maintenance program; how do you track it (e.g., card files, electronically, with specific software)?		
8	How do you prioritize investigations, repairs and rehabilitation? What critical and priority problem areas are addressed more frequently than the remainder of your system? How frequent are these areas evaluated?		
9	Are septage haulers required to declare the origin of their "load"? Are records of these declarations maintained? Do any of the declarations provide evidence of SSOs?		

* Put an "A" in the final column if this is an issue you intend to address with future action.

III.A. Collection System Management Organizational Structure

III.A	Question	Response	Act
1	Do you have an organizational chart that shows the overall personnel structure for collection system operations, including operation and maintenance staff? Please attach your chart.		
2	For which jobs do you have up-to-date job descriptions that delineate responsibilities and authority for each position?		
3	How many staff members are dedicated to collection system maintenance? Of those, how many are responsible for any other duties, (e.g., road repair or maintenance, O&M of the storm water collection system)?		
4	Are there any collection system maintenance position		
	vacancies? How long has the position(s) been vacant?		
5	For which, if any, maintenance activities do you use an outside contractor?		
6	Describe any group purchase contracts you participate in.		

III.B. Collection System Management: Training

III.B	Question	Response	Act
1	What types of training are provided to staff?		
2	Is training provided in the following areas: □ general safety, □ routine line maintenance, □ confined space entry, □ MSDS □ lockout/tagout, □ biologic hazards, □ traffic control, □ record keeping, □ electrical and instrumentation, □ pipe repair, □ public relations, SSO/emergency response, □ pump station operations and maintenance, trench/shoring, □ other (describe)?		
3	Which training requirements are mandatory for key employees?		
4	How many collection system employees are certified (e.g, NEWEA certification program) and at what grade are they certified?		

* Put an "A" in the final column if this is an issue you intend to address with future action.

III.C. Collection System Management: Communication and Customer Service

IIIC	Question	Response	Act
1	Describe your public education/outreach programs (e.g., for user rates, FOG, extraneous flow, SSOs etc.)?		
2	What are the most common collection system complaints? How many complaints have you received in each of the past three calendar years?		
3	Are formal procedures in place to evaluate and respond to complaints?		
4	How are complaint records maintained (i.e., computerized)? How are complaints tied to emergency response and operations and maintenance programs?		

III.D. Collection System Management: Management Information Systems

IIID	Question	Response	Act
1	How do you manage collection system information? (Commercial software package, spreadsheets, data bases, SCADA, etc). What information and functions are managed electronically?		
2	What procedures are used to track and plan collection system maintenance activities?		
3	Who is responsible for establishing maintenance priorities? What records are maintained for each piece of mechanical equipment within the collection system?		
4	What is the backlog for various types of work orders?		
5	How do you track emergencies and your response to emergencies? How do you link emergency responses to your maintenance activities?		
6	What written policies/protocols do you have for managing and tracking the following information: complaint work orders, scheduled work orders, customer service, scheduled preventative maintenance, scheduled inspections, sewer system inventory, safety incidents, emergency		

* Put an "A" in the final column if this is an issue you intend to address with future action.

	responses, scheduled monitoring/sampling, compliance/overflow tracking, equipment/tools tracking, parts inventory?		

III.E. Collection System Management: SSO Notification Program

IIIE	Question	Response	Act
1	What are your procedures, including time frames, for notifying state agencies, health agencies, regulatory authorities, and the drinking water authorities of overflow events?		
2	Do you use the state standard form for recording/reporting overflow events? If not, provide a sample copy of the form that is used.		

III.F. Collection System Management: Legal Authority

IIIF	Question	Response	Act
1	Are discharges to the sewer regulated by a sewer use ordinance (SUO)? Does the SUO contain procedures for controlling and enforcing the following: □ FOG; □ Infiltration/Inflow (I/I); □ building structures over the sewer lines; □ storm water connections to sanitary lines; □ defects in service laterals located on private property; □ sump pumps?		
2	Who is responsible for enforcing various aspects of the SUO? Does this party communicate with your department on a regular basis?		
3	Summarize any SUO enforcement actions/activities that have occurred in the last three calendar years.		
4	Do you have a program to control FOG entering the collection system? If so, which of the following does it include: □ permits, □ inspection □ enforcement? Are commercial grease traps inspected regularly and who is responsible for conducting inspections?		
5	Is there an ordinance dealing with storm water connections or		

* Put an "A" in the final column if this is an issue you intend to address with future action.

	requirements to remove storm water connections?		
6	Does the collection system receive flow from satellite communities? Which communities? How are flows from these satellite communities regulated? Are satellite flow capacity issues periodically reviewed?		
7	Does the collection system receive flow from private collection systems? If yes, how is flow from these private sources regulated? How are overflows dealt with?		

IV.A. Collection System Operation: Financing

IV A	Question	Response	*Act
1	Has an enterprise (or other) fund been established and what does it include:		
	wastewater collection and treatment operations; collection system maintenance; long-term infrastructure improvements; etc.? Are the funds sufficient to properly fund future system needs?		
2	How are rates calculated (have you done a rate analysis)? What is the current sewer charge rate? When was it last increased? How much was the increase?		
3	What is your O&M budget?		
4	If an enterprise fund has not been established, how are collection system maintenance operations funded?		
5	Does a Capital Improvement Plan (CIP) that provides for system repair/replacement on a prioritized basis exist? What is the collection system's average annual CIP budget?		
6	How do you account for the value of your system infrastructure for the Government Accounting Standards Board standard 34 (GASB 34)?		

* Put an "A" in the final column if this is an issue you intend to address with future action.

IV.B. Collection System Operation: Hydrogen Sulfide Monitoring and Control

IV.B	Question	Response	Act
1	Are odors a frequent source of complaints? How many have been received in the last calendar year?		
2	Do you have a hydrogen sulfide problem, and if so, do you have corrosion control programs? What are the major elements of the program?		
3	Does your system contain air relief valves at the high points of the force main system? How often are they inspected? How often are they exercised?		

IV.C. Collection System Operation: Safety

IV.C	Question	Response	Act
1	Do you have a formal Safety Training Program? How do you maintain safety training records?		
2	Which of the following equipment items are available and in adequate supply: □ rubber/disposable gloves; □ confined space ventilation equipment; □ hard hats, □ safety glasses, □ rubber boots; □ antibacterial soap and first aid kit; □ tripods or non-entry rescue equipment; □ fire extinguishers; □ equipment to enter manholes; □ portable crane/hoist; □ atmospheric testing equipment and gas detectors; □ oxygen sensors; □ H2S monitors; □ full body harness; □ protective clothing; □ traffic/public access control equipment; □ 5-minute escape breathing devices; □ life preservers for lagoons; □ safety buoy at activated sludge plants; □ fiberglass or wooden ladders for electrical work; □ respirators and/or self-contained breathing apparatus; □ methane gas or OVA analyzer; □ LEL metering?		

* Put an "A" in the final column if this is an issue you intend to address with future action.

IV.D. Collection System Operation: Emergency Preparedness and Response

IV.D	Question	Response	*Act
1	Do you have a written collection system emergency response plan? When was the plan last updated? What departments are included in your emergency planning?		
2	Which of the following issues are considered: □ vulnerable points in the system, □ severe natural events, □ failure of critical system components, □ vandalism or other third party events (specify), □ other types of incidents (specify)?		
3	How do you train staff to respond to emergency situations? Where are responsibilities detailed for personnel who respond to emergencies?		
4	How many emergency calls have you had in the past calendar year?		

IV.E. Collection System Operation: Engineering – Capacity

IV.E	Question	Response	*Act
1	How do you evaluate the capacity of your system and what capacity issues have you identified, if any? What is your plan to remedy the identified capacity issues?		
2	What procedures do you use to determine whether the capacity of existing gravity sewer system, pump stations and force mains are adequate for new connections? Who does this evaluation?		
3	Do you charge hook up fees for new development and if so, how are they calculated?		
4	Do you have a hydraulic model of your collection system? Is it used to predict the effects of system remediation and new connections?		

IV.F. Collection System Operation: Pump Stations - Inspection

IV.F	Question	Response	*Act
1	How many pump stations are in the system? How often are		

* Put an "A" in the final column if this is an issue you intend to address with future action.

	pump stations inspected? How many are privately owned, and how are they inspected? Do you use an inspection checklist?		
2	Is there sufficient redundancy of equipment at all pump stations?		
3	How are pump stations monitored? If a SCADA system is used, what parameters are monitored?		
4	How many pump station/force main failures have you had in each of the last three years? Who responds to pump station/force main failures and overflows? How are the responders notified?		
5	How many pump stations are equipped with backup power sources? How many require portable generators? How		
	many portable generators does your system own? Explain how the portable generators will be deployed during a system-wide electrical outage.		
6	Are operation logs maintained for all pump stations? Are the lead, lag, and backup pumps rotated regularly?		
7	Is there a procedure to modify pump operations (manually or automatically) during wet weather to increase in-line storage of wet weather flows?		

V.A. Equipment and Collection System Maintenance: Sewer Cleaning

V.A	Question	Response	* Act
1	What is your schedule for cleaning sewer lines on a system-wide basis? At this frequency, how long will it take to clean the system? How are sewer cleaning efforts documented?		
2	How many linear miles of the collection system were cleaned in each of the past 3 calendar years?		

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3	How do you identify sewer line segments that have chronic problems and should be cleaned more frequently? Is a list of these areas maintained and cleaning frequencies established?		
4	Approximately, how many collection system blockages have occurred during the last calendar year, and what were the causes?		
5	Has the number of blockages increased, decreased, or stayed the same over the past five years?		
6	What equipment is available to clean sewers? Is any type of cleaning contracted to other parties? If yes, under what circumstances?		
7	Do you have a root control program? Describe its critical components.		

V.B. Equipment and Collection System Maintenance: Maintenance Right-of-Way

V.B	Question	Response	Act
1	Is scheduled maintenance performed on Rights-of-Way and Easements? At what frequency? How many manholes in easement areas can not be located?		
2	Are road paving projects coordinated with the collection system operators. Are manholes paved over? How many manholes in paved areas can not be located? Describe any systems in place for locating and raising manholes that have been paved over.		

V.C. Equipment and Collection System Maintenance: Parts Inventory

V.C	Question	Response	Act
1	Do you have a central location for the storage of spare parts?		
2	How have critical spare parts been identified?		
3	How to you determine if adequate supplies on hand? Has an inventory tracking system been implemented?		

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VI A. SSES: System Assessment

VI A	Question	Response	Act
1	Do POTW flow records or prior I/I or SSES programs indicate the presence of public/private inflow sources or sump pumps? Please Explain.		
2	If problems are related to I/I, has a Sewer System Evaluation Survey (SSES) been conducted? When? What is the status of the recommendations?		
3	Do you have a program to identify and eliminate sources of I/I into the system including private service laterals and illegal connections? If so, describe.		
4	Have private residences been		
	inspected for sump pumps and roof leader connections?		
5	Are inspections to identify illicit connections conducted during the property transfer process?		
6	How many sump pumps and roof leaders have been identified? How many have been removed?		
7	Have follow-up homeowner inspections been conducted?		
8	What incentive programs exist to encourage residences to disconnect roof leaders & sump pumps? i.e. matching funds, etc.		
9	What disincentive programs exist to encourage residences to disconnect roof leaders & sump pumps? i.e. fines, surcharges		

VI.B. SSES: Manhole Inspection

VI B	Question	Response	Act
1	Do you have a manhole inspection and assessment program?		
2	Has a formal manhole inspection checklist been developed?		
3	How many manholes were inspected during the past calendar year?		

* Put an "A" in the final column if this is an issue you intend to address with future action.

VII. Energy Use

VII	Question	Response	Act
1	What is your annual energy cost for operating your system? For which pieces of equipment do you track energy use?		
2	Have you upgraded any of your pumps and motors to more energy efficient models? If so, please describe.		
3	Have you performed an energy audit in the past three years?		
4	Where do you use the most energy (fuel, electricity) in operating your collection system?		
5	If you have a treatment plant, would you be interested in participating in EnergyStar benchmarking of your treatment plant?		

VIII. Other Actions

VIII	Question	Response	Act
1	Describe any other actions that you plan to take to improve your CMOM Program that are not discussed above.		

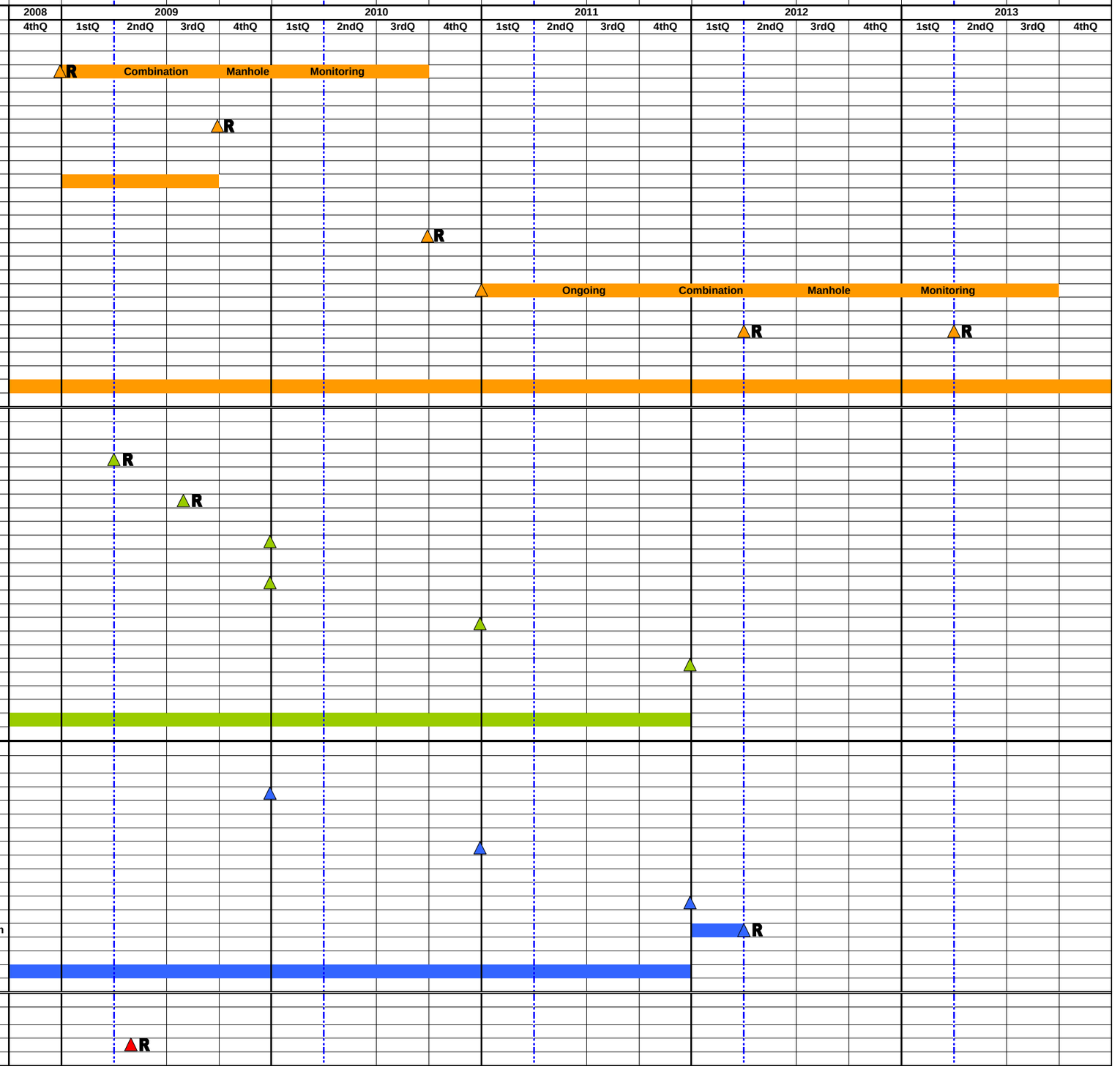
* Put an "A" in the final column if this is an issue you intend to address with future action.

NPDES Permit No. MA0100897
EPA Administrative Order Docket No. 08-042

CITY OF TAUNTON, MA
EPA Administrative Order Submittal Schedule

Submit with NPDES I/I Report | Submit with NPDES I/I Report | Submit with NPDES I/I Report | Submit with NPDES I/I Report | Submit with NPDES I/I Report

	DESCRIPTIONS	Action Date
	Combination Manholes	
1	Combination Manholes Monitoring Plan *(within 3 months of receipt of AO)*	December 31, 2008
	(Implementation of Plan shall begin within 10 months of EPA approval)	
2	Identification and Inspection of all Combination Manholes *(within 12 months of receipt of AO)*	September 30, 2009
	"Combination Manhole Report"	
3	City May Petition the EPA & MassDEP to Modify the Monitoring Program in the Event	
	that more than 120 Combination Manholes are Identified	
4-6	Combination Manhole Monitoring Results and Action Plan *(within 24 months of receipt of AO)*	September 30, 2010
	"Combination Manhole Action Plan" w/ schedule	
7	Combination Manhole Annual Monitoring/Separation/Modification	January 1, 2011
8	Combination Manhole Annual Monitoring/Separation/Modification	March 31, 2012, 2013, etc.
	Results - Summary Report (submit as part of annual I/I Report required by the NPDES Permit)	
9	EPA and MassDEP Reporting	Immediate & On-Going
	(separate sanitary sewer discharges to storm drain system or US waters)	
	Collection System	
10	CMOM Program Self Assessment Checklist	March 31, 2009
11-12	CMOM Corrective Action Plan & CMOM Corrective Action Plan Implementation Schedule	July 31, 2009
13	Complete Cleaning of Collection System	December 31, 2009
14	CCTV Inspection of 124,000 LF of Sewer Pipe in the "Core Area"	December 31, 2009
15	CCTV Inspection of at least 124,000 LF of Additional Sewer Pipe in the "Core Area"	December 31, 2010
16	CCTV Inspection of entire "Core Area" and All Out-lying Sewer	December 31, 2011
	Constructed Prior to January 1, 1970	
17	Option to Petition the EPA & MassDEP to Exclude Sections of Sewer from the	On-Going to December 31, 2011
	CCTV Inspection Requirements	
	Storm Water Drainage System	
18	Clean, Inspect, and Dye Test all Storm Water Catch Basins and Manhole	December 31, 2009
	in the Phase I Core Area and Those Structures Identified under Paragraph 2 of the Order	
19	Clean, Inspect, and Dye Test all Storm Water Catch Basins and Manhole	December 31, 2010
	in the Phase II Core Area	
20	Clean, Inspect, and Dye Test all Storm Water Catch Basins and Manhole	December 31, 2011
	NOT in the Phase I or Phase II Core Areas	
	Submit a Map(s) Indicating the Location of Such Catch Basins and Manholes	Within 3 months of Inspection Completion
21	Option to Petition the EPA & MassDEP to Exclude Catch Basins and Manholes from the	On-Going to December 31, 2011
	Inspection & Dye Testing Requirements	
	Inflow	
22	Report Detailing Previous Investigations that have been Completed for	April 30, 2009
	Roof Leader and Sump Pump Discharges to the Collection System	



23	Survey all City-Owned Buildings for Illicit Roof Leader and Sump Pump Discharges to the Collection System	December 31, 2009
	Report on Results of Survey and a Plan and Schedule for Addressing Such Roof Leader and Sump Pump Discharges to the Collection System	Within 3 months of Survey Completion
24	Roof Leader Assessment of Buildings located within the Phase I Core Area	April 30, 2010
	Report on the Findings and Recommendations of the Roof Leader Assessment Survey	July 31, 2010
25	Roof Leader Assessment of Buildings located within the Phase II Core Area	April 30, 2011
	Report on the Findings and Recommendations of the Roof Leader Assessment Survey	July 31, 2011
26	City-Wide Assessment for Illicit Sump Pump Connections to the Collection System	June 30, 2012
	Report on the Findings and Recommendations of the Sump Pump Assessment Survey	September 30, 2012
	Reporting	
27	Annual Report Summarizing the Findings of Investigations Performed Under the tasks set forth in Paragraphs 13, 14, 15, 16, 18, 19, 20 and 22 of the Administrative Order (submit as part of annual I/I Report required by the NPDES Permit)	March 31, 2010, 2011, etc.
28	CMOM Program Implementation Annual Report (submit as part of annual I/I Report required by the NPDES Permit)	March 31, 2010, 2011, etc.
	Combined Sewer Overflow	
29	Report Collection System Improvement Progress, City's Ability, Future Work, Other Options for CSO Elimination	August 31, 2011 (Funding Deadline) October 31, 2011 (EPA Deadline)
	Goal - Elimination of CSO Outfall	October 1, 2013