

EXHIBIT A

**Summary of the Terms and Provisions from NPDES Permit  
No. MA 0102440 Appealed by Town of Uxbridge**

	<b>Part</b>	<b>Page of Permit</b>	<b>Requirement</b>
1.	1.A.1.a	2 of 18	U.S. EPA used tiers in the Permit and used an arbitrary design flow of 1.25 MGD for the Reduced Flow Limit in 1.A.1.a.
2.	1.A.1.b	5 of 18	The trigger for being subject to the higher tier effluent limits is tied to the amount of flow in the system rather than a schedule for completing Facility improvements.
3.	1.A.1.a 1.A.1.b	3, 5 and 8 of 18 (fn.9)	Permit imposes E.Coli and Enterococci limits without demonstrating that the Facility can meet the limits.
4.	1.A.1	3 of 18	The Facility is not designed to meet the Total Phosphorus limits in the Reduced Flow Limit Permit and forcing compliance on Uxbridge would impose significant costs for marginal nutrient reduction.
5.	1.A.1.b	6 of 18	The Facility cannot meet the Total Phosphorus Limit in the Design Flow Limit in 1.A.1.b
6.	1.A.1	6 of 18	The Permit imposes Total Nitrogen limits that are disproportionate to the size of the Uxbridge Facility
7.	1.A.1	3 and 6 of 18	The Permit imposes Total Aluminum limits without determining whether there is “naturally occurring” aluminum present in the Blackstone River
8.	1.A.1.b.	5 of 18	The trigger for the increased design flow limits under 1.A.1.b should be keyed to a design and implementation schedule not mere increases in flow.
9.	1.A.1.b	5 and 6 of 18	Effluent Limits under 1.A.1.b are based on design flow of 2.5 MGD. These limits may be impractical once the new system is designed. The town does not want to over-design the system just to accommodate removal efficiencies that only make sense at higher flow volumes. In addition, many of the new limits are either unachievable with the existing facility or it is not known if they can be achieved because of a lack of data.
10.	1.A.2.g	10 of 18	The Permit imposes an express requirement that Uxbridge must conduct a Comprehensive Wastewater Management Plan.
11.	1.A.1	7 of 18 (fn. 7)	The Permit requires the installation of a chlorination alarm system.
12.	1.A.1	8 of 18 (fn. 9)	The Permit requires change to the dates of the existing toxicity testing schedule.
13.	C.5	12 -13 of 18	The Permit requires the development of a Collection System O & M Plan.
14.	1.A.2.b.	9 of 18	The Permit imposes a range of pH values without any accommodation for exceedences due to natural causes.