



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

JUL 23 2014

Denis Fraine
Town Administrator
Bellingham Municipal Center
10 Mechanic Street
Bellingham, MA 02019

Re: Waiver of Permit Application and Signatory Requirements for Municipal Satellite Sewage Collection System

Dear Mr. Fraine:

Under NPDES regulations, all POTWs must submit permit application information set forth in 40 C.F.R. § 122.21(j) unless otherwise indicated. Where the Region has "access to substantially identical information," or such information is "not of material concern for a specific permit," the Regional Administrator may waive permit application requirements for existing POTWs. *Id.* Pursuant to my authority under this regulation, I am waiving NPDES permit application and signatory requirements applicable to the operators of the above-named municipal satellite collection systems.

EPA regulations do not specifically address how NPDES permit coverage is to be obtained by satellite collection system components of POTWs. Ordinarily the treatment plant operator applies for the POTW's NPDES permit, and discharges from the POTW, including those from the collection systems operated by others, are covered by the permit issued to the treatment plant. Satellite collection system operators have generally not submitted separate permit applications for coverage under the POTW permit, because the treatment plant operator generally submits the information necessary for the permit writer to write limits and conditions in the permit applicable to all components of the POTW on the basis of the treatment plant's application. Receiving a single application from the operator of a portion of the discharging POTW is one reasonable way to structure the permit application process, particularly in the case of a regionally integrated treatment works where there is a centralized administrative entity responsible for operating the POTW Treatment Plant and coordinating wastewater flows from the multiple satellite collection system operators that all contribute to the final effluent discharge.

Although EPA has the authority to require operators of the municipal satellite collection systems to submit individual permit applications, in this case I find that requiring a single permit application executed by the regional POTW Treatment Plant owner/operator will be sufficient, as I have been provided, or have access to, "substantially identical information" to what would have been provided to EPA by the collection system operator, or that the detailed information requirements of Form 2A are not otherwise material to EPA's drafting of co-permittee requirements. Requiring a single application will also be less duplicative and less burdensome than requiring separate applications from each municipal satellite collection system owner/operator. Municipal satellite collection system owners/operators should consult with the regional POTW treatment plant operators to ensure that any information provided to EPA

about their respective entities is accurate and complete. In the event that EPA requires additional information, it may use its information collection authority under CWA § 308. 33 U.S.C. § 1318. As a general matter, EPA does not foresee the need to require individual permit applications from each municipal satellite collection system operator and anticipates that information in the POTW Treatment Plant operator's permit application and other information in the administrative record will be sufficient to establish permit limits and conditions for the entire treatment works. In the future permitting cycles, EPA will indicate whether it will require additional material from those entities operating the outlying portions of the treatment works to render the permit application "complete" under 40 C.F.R. § 124.3(c) after receiving and reviewing the re-application for the permit from the District, the operator of the POTW Treatment Plant.

This notice reflects my determination based on the specific facts and circumstances in this case. It is not intended to bind the agency in future determinations where a separate permit for municipal satellites would not be duplicative or immaterial.

If you have any questions or would like to discuss this decision, please contact Betsy Davis at 617-918-1576.

Sincerely,



H. Curtis Spalding
Regional Administrator



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JUL 23 2014

Jeffrey D. Nutting
Town Administrator
Town of Franklin
355 East Central Street
Franklin, MA 02038-1352

Re: Waiver of Permit Application and Signatory Requirements for Municipal Satellite Sewage Collection System

Dear Mr. Nutting:

Under NPDES regulations, all POTWs must submit permit application information set forth in 40 C.F.R. § 122.21(j) unless otherwise indicated. Where the Region has "access to substantially identical information," or such information is "not of material concern for a specific permit," the Regional Administrator may waive permit application requirements for existing POTWs. *Id.* Pursuant to my authority under this regulation, I am waiving NPDES permit application and signatory requirements applicable to the operators of the above-named municipal satellite collection systems.

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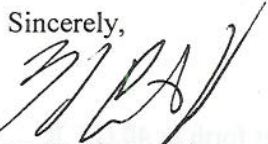
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about their respective entities is accurate and complete. In the event that EPA requires additional information, it may use its information collection authority under CWA § 308. 33 U.S.C. § 1318. As a general matter, EPA does not foresee the need to require individual permit applications from each municipal satellite collection system operator and anticipates that information in the POTW Treatment Plant operator's permit application and other information in the administrative record will be sufficient to establish permit limits and conditions for the entire treatment works. In the future permitting cycles, EPA will indicate whether it will require additional material from those entities operating the outlying portions of the treatment works to render the permit application "complete" under 40 C.F.R. § 124.3(c) after receiving and reviewing the re-application for the permit from the District, the operator of the POTW Treatment Plant.

This notice reflects my determination based on the specific facts and circumstances in this case. It is not intended to bind the agency in future determinations where a separate permit for municipal satellites would not be duplicative or immaterial.

If you have any questions or would like to discuss this decision, please contact Betsy Davis at 617-918-1576.

Sincerely,



H. Curtis Spalding
Regional Administrator



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JUL 23 2014

Suzanne K. Kennedy
Town Administrator
Town of Medway
155 Village Street
Medway, MA 02053

Re: Waiver of Permit Application and Signatory Requirements for Municipal Satellite Sewage Collection System

Dear Ms. Kennedy:

Under NPDES regulations, all POTWs must submit permit application information set forth in 40 C.F.R. § 122.21(j) unless otherwise indicated. Where the Region has "access to substantially identical information," or such information is "not of material concern for a specific permit," the Regional Administrator may waive permit application requirements for existing POTWs. *Id.* Pursuant to my authority under this regulation, I am waiving NPDES permit application and signatory requirements applicable to the operators of the above-named municipal satellite collection systems.

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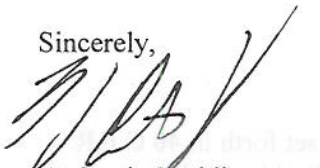
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If you have any questions or would like to discuss this decision, please contact Betsy Davis at 617-918-1576.

Sincerely,



H. Curtis Spalding
Regional Administrator



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JUL 23 2014

Charles J. Aspinwall
Town Administrator
900 Main Street
Millis, MA 02054

Re: Waiver of Permit Application and Signatory Requirements for Municipal Satellite Sewage Collection System

Dear Mr Aspinwall:

Under NPDES regulations, all POTWs must submit permit application information set forth in 40 C.F.R. § 122.21(j) unless otherwise indicated. Where the Region has "access to substantially identical information," or such information is "not of material concern for a specific permit," the Regional Administrator may waive permit application requirements for existing POTWs. *Id.* Pursuant to my authority under this regulation, I am waiving NPDES permit application and signatory requirements applicable to the operators of the above-named municipal satellite collection systems.

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Sincerely,



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