



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
CENTRAL REGIONAL OFFICE

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Governor

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Lt. Governor

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Commissioner

April 26, 1996

Albert R. Brunelli, Chairman
Charles River Pollution Control District
66 Village Street
Medway, MA 02053

RE: MEDWAY-DWPC-MA0102598
ACO-CE-95-1001 Item #10
Future Flow Evaluation

Dear Mr. Brunelli:

This is in response to your January 4, 1996 and March 21, 1996 letters regarding item 10 of the Administrative Consent Order (ACO-CE-95-1001) requiring that the District submit an evaluation of future flow projections for the facility with a schedule for recommended actions to meet future treatment needs.

We had previously reviewed a report prepared on the District's behalf by Camp Dresser & McKee (CDM) titled "Charles River Pollution Control District Phase IA Facilities Plan, September 1995". Our comments on the report were forwarded in a letter dated November 8, 1995. CDM responded to our comments in a letter to the District dated December 29, 1995.

The Department concurs with CDM's comments and the proposed upgrade of the facility to 5.7 MGD, with the design criteria based on the current NPDES permit wasteload limits. The CDM recommended improvements include, at a minimum: (1) increasing aeration basin capacity by 1.25 MG, (2) adding two additional sand filters, (3) reducing the industrial wasteload from Garelick Farms to 1,000 lbs./day, and (4) limiting future septage to the communities owning reserved capacity in the treatment plant and Wrentham.

In a letter dated January 4, 1996 the District also addressed our November 1995 comments. In the District's response (item 3) was the possibility of increasing effluent wasteload limits for the upgraded WWTF. The regulatory agencies jointly administering the NPDES program in Massachusetts (EPA and DEP) typically allocate the known assimilative capacity in each reach of a receiving stream to applicants based on concentrations that ensure water quality standards will be met. No capacity is reserved or

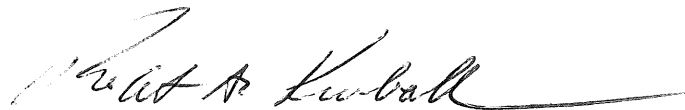
MEDWAY-DWPC-MA0102598
ACO-CE-95-1001 Item #10
Future Flow Evaluation
Page 2

withheld. As a result, the assimilative capacity for sections of many streams have been fully allocated. In these fully allocated sections, the regulatory agencies have approved further increases to existing discharges contingent on no increase in the permittee's current wasteload allocation. This means that a permittee must upgrade the degree of removal proportionally to the requested flow increase in order to insure no net increase in pollutant load to the receiving water.

In order for the regulatory agencies to consider formal requests for additional pollutant loading to the Charles River it must be demonstrated to the agencies satisfaction that there is additional assimilative capacity available which has not been previously allocated. To demonstrate this, a detailed water quality evaluation must be performed using a calibrated and verified stream model acceptable to the agencies. Any request for additional loading should be sent to both Paul Hogan of DEP and Jane Downing of U.S. EPA

We regret any inconvenience the delay in our response may have created. If you have any questions feel free to contact Margo Webber of my staff at (508) 792-7650 ext. 3738.

Very truly yours,



Robert A. Kimball, P.E.
Regional Section Chief
Division of Water Pollution Control

mw/flowinc2.177

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Representative Barbara Gardner
Representative James Vallee
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