



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

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January 26, 2006

The Honorable Robert G. Nunes
Mayor
City of Taunton
City Hall
15 Summer Street
Taunton, Massachusetts 02780

RE: TAUNTON
Comprehensive Wastewater Management Plan
CWSRF 649
Draft Report July 2005

Dear Mayor Nunes:

The Department of Environmental Protection (the Department), in response to a request made in your behalf by your Engineer Metcalf & Eddy, Inc. has reviewed the City of Taunton's Draft Comprehensive Wastewater Management Plan (CWWMP) dated July 2005. The Department finds that the draft report has been developed in accordance with our guidelines for the development of said reports. We do have a few comments that should be addressed in the final report as follows.

1. The final plan must include the full set of items for the description of the recommended plan in accordance with the CWMP guidelines. The recommended plan chapter must include the legal, institutional, management, and financial mechanisms for implementation, and there must be an analysis of costs to the average household, both sewer and non-sewer.
2. The recommended plan includes a flow allowance of an additional 700,000 gpd from the Town of Raynham. Raynham is currently developing its own CWMP and the Department cannot approve additional flows from Raynham until the analyses of need and alternatives being carried out in that CWMP are completed and approved.

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.

DEP on the World Wide Web: <http://www.mass.gov/dep>

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3. The final CWMP should indicate in more detail at the planning level what treatment plant process changes would be recommended if a total nitrogen limit is required in the future. The draft plan only indicates that significant adjustments would need to be made.
4. The final plan should provide more detail on how the City will control future sewer extensions and connections consistent with the CWMP recommendations.
5. On page 3-28, the report states that a peaking factor of 1.7 was applied to the infiltration. Is this factor being applied to the infiltration in sewers from the new needs areas only or is it being used on the entire Taunton sewer system? The Department guidance requires that, for planning purposes, the projected estimates for infiltration from new sewers be consistent with the TR-16 guidance.
6. On page 4-25, there is no detailed discussion of the status of the overall infiltration and inflow work. The final plan needs to provide an updated summary discussion of the I/I status and recommended removals for the future, including some estimate of the amount of I/I that is being contributed from the other communities tied in to the Taunton system.
7. The draft CWMP recommends sewerage in excess of 10 miles, which is the trigger for a mandatory EIR under the MEPA process. The MEPA process must be completed and receive approval before the Department can issue any final approval for the final CWMP.
8. While the recommended plan includes a proposal to increase the flow capacity of the plant beyond the current NPDES flow limit, the Department cannot agree with such a recommendation until further discussions and review take place with the Environmental Protection Agency (EPA) staff, who are responsible for any approvals of changes to the NPDES permit limits. The Department does not support the proposed increase in flow until such time as the I/I control measures required under the ACO have been implemented and shown to be effective. The Department does agree that, if any increase in the flow limit is approved, the treatment plant's other limits will need to be decreased so that the total loadings do not increase, which is what the draft CWMP recommends.

The Department cannot issue a formal approval of a final CWMP until such time as the MEPA requirement is completed. This is because the final plan may be affected by the results of the MEPA review. Therefore, once the MEPA process is complete, you should issue the final CWMP report that would include the comments contained herein and any changes required by the MEPA review process. The time required for the City to satisfy the MEPA requirement will also allow adequate time for Raynham to complete their MEPA requirement enabling addressing issue #2 above. An approved CWMP will enable the City to obtain additional priority when applying for SRF funding consideration to implement the recommended plan.

We understand that the City has recently obtained the necessary authorization to borrow additional funds to complete this project. We will be in contact with the City to discuss the necessary next steps the City will need to follow to access these additional SRF funds and complete the project work.

You should be aware that the City may be required by regulation to submit to MEPA for review each future proposed project requiring a sewer extension permit in accordance with MEPA Regulation *301CMR11.01(2)C Segmentation* since this plan identifies a larger project with a mandatory EIR requirement. You should consult with MEPA for further guidance.

If you have any questions, wish to arrange a meeting or if we can be of further assistance, please contact John M. O'Brien at (617) 292-5724.

Sincerely,

Steven J. McCurdy
Director
Division of Municipal Services

Sincerely,

David A. DeLorenzo
Deputy Regional Director
Bureau of Resource Protection

cc: Steven A. Torres, Taunton City Solicitor
Fred Cornaglia, Taunton DPW Commissioner
Donald Chelton, Metcalf & Eddy
James Revard, Woodard & Curran
Ron Lyberger, DEP BOS
David Burns, DEP/SERO
Dick Keith DEP/SERO
Jack Hamm, DEP/BOS
John O'Brien, DEP/BOS