

Progressive solutions for municipal infrastructure

DPC Engineering, LLC 46 Mohawk Drive Longmeadow, MA 01106 Phone: 413-567-6310 Fax: 413-451-1030 www.DPCengineering.com

June 17, 2022

Mr. Roger Bush Jr.
Chief Operator
Town of Russell
Sewer Department 200 Main Street
Russell, MA 01071

Re: SSO Public Notification Plan

314 CMR 16.00

Dear Mr. Bush:

As requested, enclosed is the MassDEP Sanitary Sewer Overflow (SSO) Public Notification Plan (Plan), completed on behalf of the Town of Russell (Town). Please review the contents of the Plan and sign where indicated on page 3 of the form prior to transmitting the Plan to MassDEP. At your request, DPC can transmit the document to MassDEP on behalf of the Town.

DPC recommends that Town staff charged with making SSO notifications become familiar with the new regulatory requirements and the contents of this Plan for which they are responsible for implementing. In addition to meeting the minimum requirements of the Plan, DPC has provided a flowchart to serve as a quick reference guide for determining if SSO events fall under the new 314 CMR 16.00 regulations as opposed to the existing 314 CMR 12.00 regulations.

DPC recommends that the Town incorporate this new Plan into its standard operating procedures, ideally by integrating it into the Collection System Operation & Maintenance (O&M) Manual, the Capacity, Management, Operations and Maintenance (CMOM) Program, or the Asset Management Program.

If the Town would like further assistance in developing any of the other above components required for a successful wastewater system management program, please let us know. We look forward to continuing to assist the Town on its infrastructure-related endeavors. Please contact Justin by phone at 203-605-3470 or by email at justin.skelly@dpcengineering.com if you have any questions regarding this SSO Public Notification Plan.

Sincerely,

DPC ENGINEERING, LLC

David R. Prickett, P.E.

President

Justin L. Skelly, P.E. // Senior Project Manager



DPC Engineering, LLC 46 Mohawk Drive Longmeadow, MA 01106 Phone: 413-567-6310 Fax: 413-451-1030 www.DPCengineering.com

### **Table of Contents**

SECTION	PAGE NO.
DEP Sanitary Sewer Overflow Public Notification Plan Form	3
Table 1 Required Public Notification Recipients	6
Figure 1 – Russell Village WWTF Outfall Location	7
Figure 2 – Woronoco Village WWTF Outfall Location	8
Figure 3 – Sanitary Sewer Overflow Discovery Flowchart	9
Table 2 Best Practices for Sanitary Sewer Overflow Reduction/Prevention .	10



# Massachusetts Department of Environmental Protection Bureau of Water Resources – Wastewater Management Program

# Sanitary Sewer Overflow Public Notification Plan

Important: When filling out forms on the computer, use only the tab key to move your cursor - do not use the return key.





1.	Facility Information			
	Town of Russell			
	Name of Permittee (Facility or System)			
	Roger Bush Jr.	russellwwtp@r	ussellma.net	
	Permittee Contact Name	Email Address		
	Sewer Department 200 Main Street Russell, MA 01071			
	Permittee Mailing Address			
	MA0103233;MA0100960	413-862-6215		
	NPDES Permit # (only for system with a wastewater treatment plant)	Phone Number		
	System contains (check all that apply):			
		water treatmen	•	
	Location of WWTP discharge, if applicable:	Westfield River, R	Russell, MA	
	Please attach a map with locations of discharges and affected	waterbodies.		
2.	Identification of Environmental Justice Po	pulations		
		•		
	Are there Environmental Justice (EJ) populations that would potentially be  Yes  No affected by your wastewater treatment plant discharge(s) or a sanitary sewer overflow?			
	If there are EJ populations that would potentially be affected, do more of households lack English-language proficiency, and at lethe population has speakers who self-identify as "do not speak very well"?	east 5% of	Yes	□ No
	Provide a list of all languages that notifications will be translated	d into:		
	N/A			
· <del>5</del>	14// (			
	Does your municipality provide translation of municipal docume languages listed above?	ents in the	☐ Yes	☐ No
	If you answered "yes" above, does your municipality's staff prodocuments, or are translation services outsourced?	vide translation	of municipa	
		Municipal	Staff 🔲 O	utsourced
3.	Discharges, Overflows, and Public Notifica	ation Cont	ent	
•			<b>-</b> 11 <b>.</b>	
	When public notification is required: (check box to affirm)			
	_ · · · · · · · · · · · · · · · · · · ·	40.00(4)/		
	✓ Permittee is aware that all events covered under 314 CMR public advisory notification.	16.03(1)(b-e) re	equire issua	nce of a
	Required content of public notification: (check box to affirm)	)		
	Permittee is aware of all required information for public adv 16.04(10)	risory notification	ns under 31	4 CMR
	Permittee can meet all requirements of 314 CMR 16.04(10)	)	✓ Yes	☐ No
	If no, please describe in detail which components the perm measures needed to comply. Include a schedule for compli		to meet, an	d the
	Components that cannot be met			
	Schedule for compliance (attach schedule)			



# **Massachusetts Department of Environmental Protection**Bureau of Water Resources – Wastewater Management Program Sanitary Sewer Overflow Public Notification Plan

4.	Required Timeline for Notification				
	Discovery of a Discharge or Overflow:				
	Permittee can discover an event under 314 CMR 16.04(5)(b) & (c) within the required timeline?				
	If no, specify limitations to meeting these requirements and potential remedies:				
	Issuance of Public Notification:				
	Permittee can meet the notification requirements in 314 CMR 16.04(4)				
	If no, why and what measures are needed for compliance?				
	Continuation of Public Notification:				
	Permittee can meet the notification requirements in 314 CMR 16.04(7)  Yes No				
	If no, which requirement cannot be met and what measures are needed for compliance?				
	Cessation of Public Notification:				
	Permittee can meet the notification requirements in 314 CMR 16.04(8)				
	If no, why, and what measures are needed for compliance?				
	Retraction of Public Notification:				
	Permittee can meet the notification requirements in 314 CMR 16.04(9)				
	If no, which requirement cannot be met and what measures are needed for compliance?				
<b>5</b> .	Website, Subscriber-Based System, and Recipients				
	Provide the URL for the website where you will post public notifications:				
	https://www.townofrussell.us/				
	Attach description for the subscriber-based system where the public can sign up to receive notifications.  Follow the below link to the Town's subscriber website. Enter email and check the box titled "Sanitary Sewer Overflow (SSO) Notifications"				



# Massachusetts Department of Environmental Protection Bureau of Water Resources – Wastewater Management Program Sanitary Sewer Overflow Public Notification Plan

# 5. Website, Subscriber-Based System, and Recipients (Cont.) Provide link where the public can subscribe for notifications (if different than the website listed above). https://www.townofrussell.us/subscribe List the two media outlets serving the area near the discharge or outfall that the permittee will contact to provide a public notification. Include name of organization, name of contact, and contact's email address or fax number. 22 News, Anna Giza, 413-786-2200, 1 Broadcast Center Chicopee, MA 01013, reportit@wwlp.com The Westfield News, Mike Ballway, 413-562-4181, 181 Root Rd. Westfield, MA 01085, mballway@thereminder.com Media Outlet #2 Does one of these media outlets serve the EJ population? ☐ Yes l I No If no, then provide at least one additional news organization that primarily serves the EJ population(s) within the impacted municipalities. Include name of organization, name of contact, and contact's email address or fax number. N/A See Instructions for list of Required Public Notification Recipients (314 CMR 16.04(4)(a)). Please attach list of your required contacts. Certification I attest that I have examined and am familiar with the information contained in this submittal, including any and all documents accompanying this certifying statement. The information contained in this submittal is, to the best of my knowledge, true, accurate, and complete. I am fully authorized to make this attestation on behalf of the facility.

DPC Engineering, LLC 46 Mohawk Drive Longmeadow, MA 01106 Phone: 413-567-6310 Fax: 413-451-1030 www.DPCengineering.com

**Table 1: Required Public Notification Recipients** 

l able 1: Required Public Notification Recipients			
Organization	Email/Fax	Phone	
MassDEP	massdep.sewagenotification@mass.gov	413-784-1100	
U.S. Environmental Protection Agency	R1.EPANotifications@epa.gov	1-800-424-8802	
Massachusetts Department of Public Health	DPHToxicology@mass.gov	617-624-6000	
Russell Board of Health	N/A	413-862-6215	
Impacted Board(s) of Health	Westfield: 413-572-6279 Agawam: 413-726-9723 West Springfield: N/A	Westfield: 413-572-6210 Agawam: 413-786-0400 West Springfield: 413-495-1891	
Persons subscribed to public advisory notifications	Town's ongoing list of subscribers	N/A	
Impacted public water supplier(s)	N/A	N/A	
Massachusetts Division of Marine Fisheries	N/A	N/A	
Massachusetts Department of Conservation and Recreation	MEMA.StateControl@mass.gov	617-626-1250	
Massachusetts Division of Fisheries and Wildlife	doug.cameron@mass.gov	508-389-6300	
Operators of any potentially affected bathing beaches	N/A	N/A	



Sanitary Sewer Overflow (SSO) Event Discovery



### Is it one of the following:

- 1. A discharge of partially treated wastewater.
- An SSO that discharges through a wastewater outfall, to a surface water of the Commonwealth.
- 3. An SSO that flows into a surface water of the Commonwealth as a result of sewer system capacity restraints.
- 4. An SSO that flows into a surface water of the Commonwealth as a result of a pump station or force main failure (with design peak flows of ≥ 1 MGD).

If yes

SSO event is regulated under new 314 CMR 16.00 and Public Notification is required.

#### Steps for Notification

SSO event is regulated

under existing 314

CMR 12.00.

If no

- 1. Immediate telephone and/or email to MassDEP, EPA and other parties (no later than 24 hours after discovery).
- 2. Submit a written report to DEP within five (5) calendar days, using the standard notification form.

#### **Steps for Notification**

- 1. Issue public advisory notifications as soon as possible, but no later than two (2) hours, after discovery of a discharge or overflow.
  - a) Post notification to designated location on Town website.
  - b) Email notification to list of required recipients.
  - c) Contact the two (2) designated media outlets.
- 2. Issue a public advisory notification update eight (8) hours after the initial public advisory notification is issued.

## Post-Notification Steps

- 1. Investigate cause of SSO event.
- 2. If necessary, perform follow-up field investigations (CCTV, sonar, smoke testing, etc.), and/or improvements.
- 3. Identify necessary updates to:
  - a) Collection System O&M Manual.
  - b) CMOM & Asset Management Program.
  - c) State I/I Required Reporting.
- 4. Annual updates to CMOM and Asset Management Program and Collection System O&M Manual.



Table 2: Best Practices for SSO Reduction/Prevention

Task ID	Task	Recommendations	Implementation Cycle
1	Update Collection System O&M Plan Framework	Incorporate Regulatory and permitting updates/requirements in Collection System O&M Plan Framework.	This should be completed on an annual basis.
2A	Record Mapping Updates	Record updates for GIS mapping upon observation of incorrect attributes.	This should be continuous and on-going.
2B	GIS Mapping Updates	Update GIS Mapping of the sewer system as observations are made and additional work is completed.	This should be completed on an annual basis.
3A.i	Advanced Manhole Inspections	Perform advanced manhole inspections of all manholes in the collection system to identify structural defects, O&M needs, and sources of I/I	The Town should perform manhole inspections on its entire collection system every 5 years.
3A.ii	Sonar Testing	Conduct sonar testing of gravity sewer mains to identify potential blockages and structural deficiencies.	This should be performed as needed to supplement and prioritize CCTV inspection on a 5-year cycle.
3A.iii	CCTV Inspection	Conduct closed circuit television inspections of all gravity sewer mains in the collection system to identify structural defects, O&M needs, and sources of I/I. Piping with the lowest sonar results to be prioritized. Update the asset management and GIS systems accordingly.	The Town should CCTV its entire collection system every 5 years.
3A.iv	Smoke Testing	Conduct smoke testing of gravity sewer mains to identify potential sources of inflow.	This should be performed once every 10 years or as needed.
3A.v	Manhole O&M Program	Perform O&M on manholes noted in the asset management database with internal resources. This includes addressing blockages/backups, surcharging, and roots.	This should be completed on an annual basis.

Phone: 413-567-6310

413-451-1030

www.DPCengineering.com

Fax:

Progressive solutions for municipal infrastructure

DPC Engineering, LLC 46 Mohawk Drive Longmeadow, MA 01106

Phone: 413-567-6310 Fax: 413-451-1030 www.DPCengineering.com

Task ID	Task	Recommendations	Implementation Cycle
3A.vi	Manhole Rehab Program	Conduct in-situ rehabilitation of manholes. This can include a chemical grout, cementitious lining, or epoxy lining.	The Town should rehabilitate a portion of manholes in the collection system every year. This will allow the Town to implement the goal of continuously monitoring and rehabilitating its collection system.
3A.vii	Pipe O&M Program	Perform O&M on pipes noted in the asset management database with internal resources. This includes addressing blockages/backups and roots.	This should be completed on an annual basis.
3A.viii	Pipe Rehab Program	Conduct in-situ rehabilitation of sanitary sewer piping. Pipe rehabilitation to be prioritized based on the results of the CCTV work. Pending the results of the CCTV the complete replacement of gravity sewer sections may be required if structural deficiencies cannot be fixed via in-situ rehabilitation methods.	The Town should rehabilitate a portion of sewer pipes in the collection system every year. This will allow the Town to implement the goal of continuously monitoring and rehabilitating its collection system.
3A.ix	Confirm and Disconnect Inflow Sources	Confirm inflow sources discovered as part of smoke testing. Disconnect confirmed inflow sources.	This should be performed as needed.
3B	Asset Management Plan Updates	Update the Asset Management Plan and Asset Management Databases based on the rehabilitation work.	This should be completed on an annual basis.
3C	Annual CMOM Updates/Reports	Prepare an annual report to EPA/MassDEP summarizing the Town's efforts related to CMOM in the collection system.	This should be completed on an annual basis.
4A	Summarize Annual Flow Composition	Summarize the annual flows within the collection system (i.e., base sanitary vs I/I).	This should be completed on an annual basis.

Phone: 413-567-6310 Fax: 413-451-1030 www.DPCengineering.com

Task ID	Task	Recommendations	Implementation Cycle
4B	Annual Flow Monitoring	Conduct annual flow monitoring, to continuously evaluated the sanitary sewer collection system, and guide future I/I evaluation.	The Town should conduct flow monitoring of its entire collection system every 5 years. We recommend that the Town focus on smaller subareas each year, rather than monitor the entire collection system at once, every 5 years.
4C	Capacity Allocation Guidelines	Develop Capacity Allocation Guidelines to ensure that adequate capacity is being reserved for current and future sewer users. Review and update annually.	This should be completed on an annual basis.
5A	Staffing Requirements	Review staffing needs and permit requirements.	This should be completed on an annual basis.
5B	Policies and Procedures	Review current and future policies and procedures.	This should be completed on an annual basis.
5C	Public Communication	Provide annual updates and ongoing public communication.	This should be continuous and on-going, with a formal update provided annually to the public.
6A	Standard Operating Procedures	Develop and implement standard operating procedures for the pump stations and collections system. Review and update annually.	This should be completed on an annual basis.
6B	Spare Part Inventory	Perform an inventory of spare parts for the pump stations and collection system. Purchase spare parts as necessary.	This should be completed on an annual basis.
7A	Capital Plan	Develop an annual capital plan based on CMOM recommendations and other wastewater needs.	This should be completed on an annual basis.
7B	Sewer Rate Evaluation	Evaluate the impact of the CMOM program to the sewer rates.	This should be completed on a 5-year cycle with updates occurring annually.
7C	Facilities Connection Charge Evaluation	Evaluate the current Facilities Connection Charge. Incorporate the FCC into the Capacity Allocation Guidelines.	This should be completed on a 5-year cycle with updates occurring annually.