TOWN OF WESTFORD, MASSACHUSETTS

REQUEST FOR QUALIFICATIONS
FOR

PROFESSIONAL WASTEWATER TREATMENT FACILITIES CONTRACT OPERATION SERVICES

September 5, 2016

Town of Westford

Westford Water Department

60 Forge Village Road

Westford, MA 01886

WESTFORD WATER DEPARTMENT – WASTEWATER TREATMENT FACILITIES
PROFESSIONAL CONTRACT OPERATION SERVICES

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SECTION 1

INVITATION FOR SUBMISSION OF QUALIFICATIONS

The Westford Water Department, acting through its Town Manager and Board of Water Commissioners, is accepting sealed Request for Qualifications (RFQ) for Professional Wastewater Treatment Facilities Contract Operation Services for the period of November 1, 2016 through October 31, 2017, with an annual renewal option for two consecutive years thereafter, in accordance with the Scope of Services detailed in this RFQ. The scope of services generally consist of the operational oversight and maintenance, as well as Groundwater Discharge Permit compliance associated with the Town's wastewater treatment facilities located on the grounds of the Blanchard School, Westford Academy, Abbot School, and the Stony Brook School located in Westford, Massachusetts.

The RFQ document may be obtained at the Westford Water Department, 60 Forge Village Road, Westford, MA 01886 on or after September 5, 2016, Monday through Friday between 8 a.m. and 4 p.m or by registering online at westfordma.gov/procurement. The Water Department phone number is (978) 692-5529. Site visits may be scheduled upon request.

Qualified persons or firms shall submit sealed RFQ by 3:00 P.M. on Friday, October 7, 2016 to the Westford Water Department, 60 Forge Village Road, Westford, MA 01886. Late proposals will not be accepted. Emailed or faxed proposals will not be accepted.

The Town reserves the right to waive any informalities, to accept or reject, in whole or in part any or all bids, or take whatever other action may be deemed to be in the best interest of the Town.

SECTION 2

SCOPE OF SERVICES

The Westford Water Department is requesting sealed proposals from licensed and qualified professional wastewater treatment facility contract operation firms with documented experience with the operation of decentralized wastewater treatment facilities permitted under the Massachusetts Groundwater Discharge Permit Program, utilizing a rotating biological contactor treatment system. The scope of services, as detailed further in this section, will be applied to the operation and oversight of four wastewater treatment facilities; the Blanchard School wastewater treatment facility, the Westford Academy wastewater treatment facility, the Stony Brook School wastewater treatment facility, and the Abbot School wastewater treatment facility. The Request for Qualifications (RFQ) process will enable the town of Westford to assign higher ratings to operation firms that can demonstrate prior experience, expertise and performance in providing similar services throughout the Commonwealth. Following receipt and review of the submitted proposals, interviews with each qualified consultant may be conducted prior to making the final selection.

All proposals shall, at a minimum, address the following requirements:

SCOPE OF SERVICES

The Professional Contract Operations Firm's proposal shall include, but not be limited to, the following scope items to be performed for each of the four wastewater treatment facilities:

1. Provide all resources necessary to ensure a successful one (1)-year partnership with the Town. Upon annual review of performance of the contract operations firm, there will be an option to renew the annual contract for two consecutive years thereafter.

2. Perform compliance sampling and analysis of influent, effluent and groundwater in accordance with the Groundwater Discharge Permits for each facility. Analysis of samples shall be performed by a Massachusetts Certified Laboratory independent from the Contract Operations Firm.

3. Provide a Licensed Massachusetts Operator (Grade 4M License) as the primary operator to perform daily supervision of the wastewater treatment facility Monday through Friday. Provide a Licensed Massachusetts Operator (Grade 3M) to act as a backup operator. Operator shall inspect components and measure/record information as required by the Groundwater Discharge Permit. Operator shall also perform daily checks on facility's effluent to verify compliance with Groundwater Discharge Permit and record all pertinent information of the daily on goings at the plants in a daily log book.

4. Provide a Licensed Massachusetts Operator (Grade 3M License) to provide on-call services 24 hours per day, 7 days per week.

5. Prepare and submit monthly Discharge Monitoring Reports (DMRs) and submit to the appropriate entities, which include but are not necessarily limited to the MassDEP and the Westford Board of Health. All compliance data and reports shall be made available to the Town in Microsoft Excel/Word formats.

6. Perform routine housekeeping and custodial duties in and around each of the four facilities customary to Professional Contract Operations Services.

7. Provide for all Firm employees to be trained in the proper OSHA safety procedures as required by local, state and federal regulations. Provide for all necessary safety equipment, personal protective equipment, operating procedures, etc., to ensure a safe work environment.

8. Check and maintain proper sludge levels in the wastewater treatment facility and ancillary components.

9. Test all emergency back-up systems on a monthly basis.

10. Maintain sufficient chemicals as required to operate the facility. Chemical shall be furnished by the Contract Operations Firm.

11. Adhere to access control policies established by the Owner and ensure that the facilities are secured at all times.

12. Maintain sufficient supplies of reagents, buffers, personal protection equipment, oils and grease, etc., for proper and safe operation of the wastewater treatment facility.

13. Communicate with Owner the significant activities accomplished during the previous month. This is to be accomplished by means of the written monthly inspection report in addition to the Permit report, which is to be submitted with the DMR data by the 15th of the preceding month. The Report Template has been included as Appendix E for use in preparing the required monthly report.

14. Perform, at a minimum, the basic preventative maintenance at each wastewater treatment facility and its ancillary components in accordance with attached "Table 1 - Minimum Maintenance Schedule" for each wastewater treatment facility.

15. The Firm shall provide a table of hourly rates which describes all costs and the method of computing them, for any out of scope services requested and performed during the contract period.

<u>ADD ALTERNATE ITEM</u>

16. Schedule sludge removal as necessary with a licensed septage hauler. At a minimum, cost proposal shall include 30,000 gallons of sludge removal once per year for each wastewater treatment facility.

Table 1
Minimum Maintenance Tasks Schedule
Town of Westford
Wastewater Treatment Facilities
Westford, Massachusetts

Maintenance Task by Process	*Frequency*
Raw Waste Lift Stations	
Check floats, alarms and bulbs	Once per week
Check scum level	Quarterly
Check sludge level	Quarterly
Remove and inspect pump	Annually
Inspect rails and mounts	Annually
Exercise all valves	Annually
Grease Traps	
Check grease levels	Weekly
Pretreatment Tank	
Check tees	Monthly
Check scum levels	Weekly
Check sludge levels	Weekly
Pump sludge and scum	As needed (at 4' depth)
Flow Equalization Tank	
Check floats and alarms	Monthly
Check sludge and scum levels	Monthly
Remove and inspect pump	Annually
Inspect rails and mounts	Annually
Exercise all valves	Annually
Aerobic RBC	
Check shaft lube/grease	Quarterly
Check chain tension	Quarterly
Check oil level in chain bath	Monthly
Check oil level in reducer	Annually
Check media condition	Daily
Change Oil	Annually
Load Test	Annually

Table 1 - Continued
Minimum Maintenance Tasks Schedule
Town of Westford
Wastewater Treatment Facilities
Westford, Massachusetts

Maintenance Task by Process	*Frequency*
Anoxic RBC	
Check for leaks at seal	Monthly
Check shaft lube	Quarterly
Check oil level in reducer	Monthly
Check chain tension	Quarterly
Change oil	Annually
Check media condition	Weekly
Clarifier	
Check sludge level	Weekly
Grease Fitting	Monthly
Change oil	Biannually
Scum cycles	Weekly
Sludge cycles	Weekly
Sand Filters	
Check level	Daily
Add Cl_2 for cleaning	As needed
Check sand condition	Weekly
Inspect backwash pumps	Quarterly
Check float switches	Monthly
Manually run backwash cycle	As needed
Blowers	
Grease motor bearings	Monthly
Check drive belts for wear	Monthly
Check air filters	Monthly
Check oil level	Monthly
Change oil	Per manufacturer's Requirements (min. @ 2,000 hrs
Check solenoid valves	Quarterly

Table 1 - Continued
Minimum Maintenance Tasks Schedule
Town of Westford
Wastewater Treatment Facilities
Westford, Massachusetts

Maintenance Task by Process	***Frequency***
UV System	
Clean/Check Intensity Sensor	Weekly
Clean UV Sleeves	Monthly
Replace bulbs	As Needed
Alarm System	
Test all alarms	Monthly
Verify phone numbers	Quarterly
Effluent Disposal System	
Inspect for breakout	Weekly
Operate Valves	As Needed
Flow Meter	
Calibrate by outside service contractor	Annually
Check for operation	Monthly
Effluent Dosing Tank	
Check floats and alarms	Quarterly
Remove and inspect pumps	Annually
Inspect rails and mounts	Annually
Exercise all valves	Annually

REGULATORY COMPLIANCE

The Professional Contract Operations Firm will supervise all regulatory compliance and financial transactions, except for the enforcement of the Owner's Ordinances or regulations. The Professional Contract Operations Firm shall operate the Facilities in compliance with current state and federal regulatory requirements and the Discharge Permits.

OWNER'S RESPONSIBILITIES

1. Owner shall provide for office space for the Professional Contract Operations Firm within the WWTF(s).

2. Owner shall pay for all permit compliance and inspection fees as required by MassDEP.

3. Owner shall directly provide for all electrical and telephone utility costs.

4. Owner shall be responsible for snow removal at wastewater treatment facility and monitoring wells.

5. Owner shall schedule, arrange, and pay for the annual maintenance contract and testing for the emergency generator at each facility.

6. Owner shall directly provide for all fuel and electricity required to run the heating and air conditioning systems as well as the emergency generator system.

7. Owner shall directly provide for all capital improvements.

8. Owner shall have the right to inspect the operations at any time.

9. Owner shall promptly procure and continually maintain, in full force and effect, and in accordance with their respective terms, all guarantees, warranties, easements, permits, licenses, and other similar approvals and consents necessary to operate and maintain the Facilities received by or granted to owner of all Facilities and component parts thereof.

10. Owner shall enforce ordinances, including those pertaining to user pretreatment standards and provide for the billing and collection of all user fees and rates pertaining to the Facilities.

11. Owner shall, at all times, provide access to the facilities for the Firm, its agents, and employees.

SECTION 3

EVALUATION CRITERIA

The Town of Westford will be evaluating proposals according to the following criteria:

1. Minimum Qualifications.

Proposers must be able to meet a set of minimum requirements in order to be considered "responsive" to the RFQ, and therefore eligible for further rating based on the comparative evaluation criteria. If the proposer does not meet the minimum criteria, their proposal may be rejected without further review. The Town of Westford reserves the right to reject any and all proposals if deemed in the best interest of the Town. The Town's evaluators must answer YES or NO to each question below. The consensus evaluation for each question must be YES for the contract operations firm to move to the next evaluation round.

1. Is the response complete in accordance with the RFQ instructions?

2. Has the Professional Contract Operations Firm successfully demonstrated the operation of at least four comparable facilities for at least two separate organizations, one of which must be in Massachusetts, and have operated the facility within the last five years?

3. Does the response include descriptions of those projects including references who can be contacted for each facility?

4. Is the Professional Contract Operations Firm an appropriately licensed business in good standing the Massachusetts Department of Revenue and MassDEP?

2. Non-Cost Evaluation Criteria.

An evaluation rating system will be applied to each criterion listed below for comparative evaluation of those proposals deemed to meet the minimum qualifications above. In keeping with the state's standardized procurement process, each of the following criteria will be ranked by reviewers using one of these four standards: *Highly Advantageous, Advantageous, Minimally Acceptable, and Unacceptable*. After each reviewer on the evaluator committee has scored each proposal, the committee will develop consensus rankings for each criterion. Any proposer with a consensus *Unacceptable* for any criterion will be eliminated from further consideration. Proposers will then be ranked by adding the consensus rankings for all the criteria and the committee will decide which proposers it will interview.

The following criteria will be used to identify responsive proposals:

Operations approach and past performance are more important than qualifications and management approach with percentages shown for each one. Cost will be evaluated separately.

1. <u>Operation Approach</u>. The overall quality, completeness, and methodology of the operational approach and organization to be used by the proposer and the extent to which the proposer demonstrates the ability to properly operate the wastewater

treatment facilities. (30%). The specific rating for this criterion will be based on the following:

Highly Advantageous: The Proposer provided an excellent response, which clearly explains the proposer's ability to meet or exceed the requirements of each of the tasks described under the Scope of Services section. The proposer's response demonstrated the ability of the proposed team to provide and complete the services with a high confidence level.

Advantageous: The Proposer provided an adequate response, which addresses many of the tasks discussed under the Scope of Services section in a reasonable manner. The proposer showed the ability to successfully provide the contract operations services.

Minimally Acceptable: The proposer covered all of the required points in the RFQ but did not provide any information or demonstrate any capability beyond that minimally required. The proposer may be able to provide the required services, but there appears to be substantial risk or uncertainty of the ability to provide the services.

Unacceptable: The Proposer did not provide adequate responses to most of the items listed under the Scope of Services section or did not demonstrate the proposed team's ability to meet the required services.

2. Experience/Past Performance. The proposer's prior experience (individual experience or firm experience), work which best illustrates the proposer's current qualifications and ability, including descriptions of prior experiences similar to the services envisioned in the RFQ, and the proposer's past performance on similar public and/or private operation services for wastewater treatment facilities. (30%) The specific rating for this criterion will be based on the following:

Highly Advantageous: The proposer showed significant experience with similar facilities including at least four in Massachusetts directly related to aerobic RBC wastewater treatment facilities and demonstrated the ability of the proposed team to provide the services with a high confidence level.

Advantageous: The Proposer provided information that demonstrated that the proposed team could successfully provide the services.

Minimally Acceptable: The proposer meets minimal past performance requirements, but did not have experience with directly related to aerobic rotating biological contactor facilities. The proposer's experience indicated that the team may be able to provide the services, but there appears to be substantial risk or uncertainty.

Unacceptable: The Proposer did not demonstrate by past experience that the proposed team could meet the requirements of the RFQ.

3. Qualifications/Key Personnel. The identity and quality (i.e. appropriateness, capability, and experience) of key personnel, team members and sub-consultants expected to work on this project, including their expected roles and the extent and continuity of their participation and the individual's experience with similar facilities. The Firm also must have all professional licenses required. (20%) The specific rating for this criterion will be based on the following:

   Highly Advantageous: The Proposer's team has substantial experience with at least four school wastewater treatment facilities in Massachusetts within the last five years. The response demonstrated with a high degree of confidence the ability of the proposed team to provide the services described in the RFQ.

   Advantageous: The Proposer's team has experience operating at least two school wastewater treatment facilities. The response demonstrated that the proposed team could successfully provide the services described in the RFQ.

   Minimally Acceptable: The proposer's team generally meets the required qualifications and may be able to provide the services, but there appears to be substantial risk or uncertainty.

   Unacceptable: The Proposer's team did not have the qualifications to meet the requirements of the RFQ.

4. Organization and Management Approach/Capacity. The clarity, completeness, and effectiveness of the proposed organizational structure of the operations team and the proposed management approach. The demonstrated ability of the Professional Contract Operations Firm to work together effectively and to interact effectively with Town and MassDEP operations and staff. The proposer's capacity, via identifying staff that would be assigned to these facilities along with their current workload, in order to demonstrate the proposers ability to apply and commit itself successfully to the necessary tasks and to complete the required services as reflected in the financial status of the firm, and its staffing plan. (20%) The specific rating for this criterion will be based on the following:

   Highly Advantageous: The Proposer provided an excellent response, which demonstrated the staffing capacity and ability of the proposed Firm to provide the services with a high confidence level of success.

   Advantageous: The proposer provided information that demonstrated that the proposed Firm could successfully provide the services in the RFQ.

   Minimally Acceptable: The proposer may be able to provide the services, but there appears to be substantial risk or uncertainty.

   Unacceptable: The information provided by the proposer did not demonstrate a project organization or project team management that could meet the requirements of the RFP.

3. Cost Evaluation.

For those responsive proposals that remain in contention after the technical evaluation, cost will be evaluated for the competitiveness of the cost proposal, and appropriateness of proposed cost to the proposed level of effort. Between or among proposals rated technically equal, the Town would select the lowest cost equally rated proposal. However, the Town will not necessarily award the contract to the lowest qualified bidder and with appropriate justification and rationale may select a proposal with a higher cost.

SECTION 4

CONTENTS OF QUALIFICATIONS PROPOSAL

The proposer must include a cover letter, signed by an individual authorized to bind the Firm, partnership, joint venture, etc. and containing at a minimum:

- A commitment of staff to perform the services as described in the proposal
- A certification that no conflict of interest exists

To facilitate review, each proposal, at a minimum, must be organized as follows:

Section 1. <u>Technical Approach</u>.
The proposal should include a narrative describing the proposer's understanding of the scope of services and the approach to achieving the RFQ requirements divided and numbered into sections labeled with the same headings as appearing for the tasks in the scope of services. This section shall be limited to 5 pages.

Section 2. <u>Experience/Past Performance</u>.
The proposal should include a narrative description of the proposer's experience in contract operation services for decentralized wastewater treatment facilities, for facilities servicing Schools, and facilities with Individual Permits.

The proposal should describe the services (performed within the past 5 years) which best illustrates the proposer's current qualifications and ability. The proposal should include a listing of all decentralized wastewater treatment facilities operated during the past 5 years. Included should be descriptions of prior experience similar to the services envisioned in this RFQ, specifically municipal, schools and/or similar sized and configured facilities.

The description of each past facility should include:

- The name (if applicable) and location of the project
- The name, address, and telephone number of a reference to be contacted for additional information. The reference(s) must have been involved with reviewing the operation of the facility.
- A description including the type of facility, major unit processes, design average daily flow rate, general method of operation and operation costs (if known).
- Date of operation services and start/end of operation
- A list of the staff proposed for the town of Westford operations that also provided the operational services.

The proposer should also describe, more generally, its past performance on public and private projects, including past performance on all projects for the Town of Westford. This section shall be limited to 5 pages. The experience listed in this section may pertain to the firm, to specific individuals, or to both.

Section 3. <u>Organizational and Management Approach/Capacity</u>.
The proposer should describe its proposed organizational structure and management approach to this project. It should describe the operation team members and responsibilities for each member

of the team and its plan to maintain cost control, to resolve resource constraints, and to interact effectively with Town staff and the MassDEP. The Town's expectation is that there will be no changes in proposed staff without prior approval of the Town. The proposer should also demonstrate its capacity to successfully apply and commit itself to the operation tasks and to complete the required services. It should describe the financial stability of the firm and its staffing plan. This section shall be limited to 5 pages.

Section 4. Qualifications/Key Personnel. The proposer should provide the identity and describe the qualifications, capability, and experience of key personnel, team members, and sub-consultants to be involved with this project, as well as their availability and the extent of their participation. As noted, key personnel identified are expected to be available throughout the duration of the contract. This section shall be limited to 3 pages, although resumes may be attached to the proposal without affecting the page limitation.

Section 5. Proof of Insurance. The Contract Operations Firm shall procure and maintain insurance for protection from claims under workers' compensation acts, liability insurance for claims for damages because of bodily injury including personal injury, sickness or disease or death of any and all employees or of any person other than such employees, and from claims or damages because of injury to or destruction of property including loss of use.

Proposal Price

In a separately sealed letter or volume, the proposal should include the total dollar amount to perform this work with costs broken down by major task or activity using the attached Form of Proposal.

FORM OF PROPOSAL

Firm/Proposer: _____

Receipt of Addenda _____ of _____

Blanchard School Wastewater Treatment Facility

Item	Monthly Fee ($)
Labor	
Maintenance	
Laboratory Services	
Other *(please describe)*	
Monthly Total Fee	
Extended Annual Total	
Add Alternate Item	**Annual Fee - Lump Sum ($)**
Sludge Pumping & Removal – 30,000 gals	

Westford Academy Wastewater Treatment Facility

Item	Monthly Fee ($)
Labor	
Maintenance	
Laboratory Services	
Other *(please describe)*	
Monthly Total Fee	
Extended Annual Total	
Add Alternate Item	**Annual Fee - Lump Sum ($)**
Sludge Pumping & Removal – 30,000 gals	

Abbot School Wastewater Treatment Facility

Item	Monthly Fee ($)
Labor	
Maintenance	
Laboratory Services	
Other *(please describe)*	
Monthly Total Fee	
Extended Annual Total	
Add Alternate Item	**Annual Fee - Lump Sum ($)**
Sludge Pumping & Removal – 30,000 gals	

Stony Brook Wastewater Treatment Facility

Item	Monthly Fee ($)
Labor	
Maintenance	
Laboratory Services	
Other *(please describe)*	
Monthly Total Fee	
Extended Annual Total	
Add Alternate Item	**Annual Fee - Lump Sum ($)**
Sludge Pumping & Removal – 30,000 gals	

Summary – Annual Cost

Facility	Annual Fee ($)
Blanchard School WWTF	
Westford Academy WWTF	
Abbot School WWTF	
Stony Brook WWTF	
Total Annual Fee	

Summary – Annual Cost Plus Add Alternate Item

Facility	Annual Fee ($)
Blanchard School WWTF w/Sludge Pumping & Removal	
Westford Academy WWTF w/Sludge Pumping & Removal	
Abbot School WWTF w/Sludge Pumping & Removal	
Stony Brook WWTF w/Sludge Pumping & Removal	
Total Annual Fee	

SECTION 5

SUBMISSION/PROPOSAL DUE DATE

Proposals are due to the Town no later than 3:00 p.m. on Friday, October 7, 2016 by mail or hand delivery to:

Town of Westford Water Department
60 Forge Village Road
Westford, MA 01886

Proposals must be submitted in a sealed envelope or box clearly marked on the outside:

"Professional Wastewater Treatment Contract Operations Proposal"

Six (6) hardcopies of the technical proposal shall be submitted, along with two electronic copies of the technical proposal in Portable Document Format (PDF) on a CD.

As previously stated, proposal price must be submitted in a separately sealed envelope, which may be included within the package including the non-price proposals.

No emailed or faxed proposals will be accepted.

- **Clarification -** Questions/requests for clarification will be accepted until 9:00 a.m. on October 3, 2016. They shall be directed to Stephen Cronin, Water Superintendent, by phone at (978) 692-5529, by fax at (978) 692-5530, or by email at scronin@westfordma.gov. Answers to all substantive questions will be put in writing and supplied to all parties who have received a copy of the RFQ, either by fax, mail or email.

- **Revisions** – If the Town determines that it is necessary to change any part of this RFQ or provide additional information or clarifications, an addendum will be issued and furnished to each prospective respondent who has received a copy of this RFQ.

- **Withdrawal of Proposals** – Proposals may be withdrawn by written request up to the deadline for submission of proposals.

- **Late Proposals** – Late proposals will not be accepted.

- **Amendments to Proposals** – Proposals may be amended up until the deadline for submission of the proposals. Amendments must be submitted sealed and in writing, clearly stating the changes to the proposal. An additional set of revised/amended copies of the proposal is required.

- **Proposals are Firm Offers -** Proposals responding to this RFQ are considered firm and may not be withdrawn after 12:00 noon on August 22, 2013.

- **Expenses** – All expenses associated with preparing and submitting proposals, including any interviews shall be the responsibility of the proposer.

- **Return of Proposal Materials** – One copy of the proposal must be retained by the Town of Westford, however additional copies of the proposal may be retrieved by proposers not selected for project after contract award.

- **Contract Award** – The responsive proposals will be reviewed in August, with the intent being to recommend to the Board of Selectmen the firm to award the Contract to. The target date for awarding the contract is October 2016.

ATTACHMENT A

GROUNDWATER DISCHARGE PERMIT

ABBOT SCHOOL WWTF

ATTACHMENT B

GROUNDWATER DISCHARGE PERMIT

BLANCHARD SCHOOL WWTF

ATTACHMENT C

GROUNDWATER DISCHARGE PERMIT

STONY BROOK SCHOOL WWTF

ATTACHMENT D

GROUNDWATER DISCHARGE PERMIT

WESTFORD ACADEMY WWTF

ATTACHMENT E

REPORT TEMPLATE

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE
205B Lowell Street, Wilmington, MA 01887 • (978) 694-3200

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

April 30, 2008

Mr. Everett V. Olsen, Jr.
Superintendent of Schools
23 Depot Street,
Westford, MA 01886

Re: FINAL GROUNDWATER DISCHARGE PERMIT

At: **Abbot School, 25 Depot Street, Westford, MA 01886**

Transmittal No: **W138691**
Permit No: **729-1**

Dear Mr. Olsen:

In response to your application for a permit to discharge into the ground a treated effluent from the wastewater treatment facility located at **Abbot School, 25 Depot Street, Westford, MA 01886**, and after due public notice, I hereby issue the attached final permit.

No comments objecting to the issuance or terms of the permit were received by the Department during the public comment period. Therefore, in accordance with 314 CMR 2.08, the permit becomes effective on the date of issuance.

Parties aggrieved by the issuance of this permit are hereby advised of their right to request an Adjudicatory Hearing under the provision of Chapter 30A of the Massachusetts General Laws and 314 CMR 1.00, Rules for the Conduct of Adjudicatory Proceedings. Unless the person requesting the adjudicatory hearing requests and is granted a stay of the terms and conditions of the permit, the permit shall remain fully effective.

Please pay particular attention to "C Supplemental Conditions" in this permit. Paragraphs 1-11 are equally important as Section B: Monitoring and Reporting. There are requirements for submissions for staffing plans, information on the sludge hauler, etc.

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD# 866-539-7622 or 617-574-6868.
http://www.mass.gov/dep • Fax (978) 694-3499
Printed on Recycled Paper

Please contact Lisa Dallaire at 978-694-3238 should you have any questions.

Sincerely,

Eric Worrall,
Deputy Regional Director,
Bureau of Resource Protection

cc: w/ enclosures
Marybeth Chubb, DEP/Boston/Groundwater,
Todd Chaplin, Mount Hope Engineering, Inc.,
Steve Badger, WWEM Contract Operations

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

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FINAL
GROUNDWATER DISCHARGE PERMIT

Name and Address of Applicant: **Westford Public Schools, 23 Depot Street, Westford, MA 01886**

Date of Application: **July 9, 2007**
Application/Permit No. **W138691/(729-1)**

Date of Issuance: April 30, 2008

Date of Expiration: April 30, 2013

Effective Date: April 30, 2008

AUTHORITY FOR ISSUANCE

Pursuant to authority granted by Chapter 21, Sections 26-53 of the Massachusetts General Laws, as amended, 314 CMR 2.00, and 314 CMR 5.00, the Massachusetts Department of Environmental Protection (the Department or MassDEP) hereby issues the following permit to: **Westford Public Schools** (hereinafter called "the permittee") authorizing discharges to the ground from the on site wastewater treatment facility (advanced treatment using aerobic RBC, secondary clarification, denite tertiary filtration for nitrogen removal, UV disinfection and subsurface effluent disposal) located at **Abbot School, 25 Depot Street, Westford (Town Hall, Fire house, Police Dept, Roudenbush Community Center, Daycare and Library also connected)** such authorization being expressly conditional on compliance by the permittee with all terms and conditions of the permit hereinafter set forth.

4/30/08

Eric Worrall
Deputy Regional Director

[Date]

I. SPECIAL CONDITIONS

A. Effluent Limits

The permittee is authorized to discharge into the ground from the wastewater treatment facilities for which this permit is issued a treated effluent whose characteristics shall not exceed the following values:

Effluent Characteristics	Discharge Limitations
Flow	10,000 gpd
Biochemical Oxygen Demand (BOD_5) (5 Day at 20°C)	30 mg/l
Total Suspended Solids (TSS)	30 mg/l
Nitrate Nitrogen	10 mg/l
Total Nitrogen ($NO_2 + NO_3 + TKN$)	10 mg/l
Oil & Grease	15 mg/l
Fecal Coliform	200/100ml

a) The pH of the effluent shall not be less than 6.5 nor greater than 8.5 at any time or not more than 0.2 standard units outside the naturally occurring range.

b) The discharge of the effluent shall not result in any demonstrable adverse effect on the groundwater or violate any water quality standards that have been promulgated.

c) The monthly average concentration of BOD and TSS in the discharge shall not exceed 15 percent of the monthly average concentrations of BOD and TSS in the influent into the permittee's wastewater treatment facility.

d) When the average annual flow exceeds 80 percent of the permitted flow limitations, the permittee shall submit a report to the Department describing what steps the permittee will take in order to remain in compliance with the permit limitations and conditions, inclusive of the flow limitations established in this permit.

B. Monitoring and Reporting

1) The permittee shall monitor and record the quality of the **influent** and the quality and quantity of the **effluent** prior to discharge to the leaching facilities according to the following schedule and other provisions:

INFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
BOD_5	Monthly	24-Hr. Composite
TSS	Monthly	24-Hr. Composite
Total Solids (TS)	Monthly	24-Hr. Composite
Ammonia Nitrogen	Monthly	24-Hr. Composite

EFFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
Flow	Daily	Reading Report Max-Min-Avg
pH	Daily	Grab
UV Intensity	Daily	Reading
BOD_5	Monthly	24-Hr. Composite
TSS	Monthly	24-Hr. Composite
TS	Monthly	24-Hr. Composite
Nitrate Nitrogen	Monthly	24-Hr. Composite
Ammonia Nitrogen	Monthly	24-Hr. Composite
Total Nitrogen ($NO_2 + NO_3 + TKN$)	Monthly	24-Hr. Composite
Oil & Grease	Monthly	Grab
Fecal Coliform	Monthly	Grab
Total Phosphorus* (as P)	Quarterly	Grab
Orthophosphate* (as P)	Quarterly	Grab
Volatile Organic Compounds (US EPA Method #624)	Annually	Grab

* After one full year of monitoring the Total Phosphorus and Orthophosphate results, MassDEP may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of MassDEP, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors.

2) The permittee shall sample the upgradient monitoring well(s), OW #1 and the downgradient monitoring wells OW #2 and OW #3 as shown on the approved plan entitled Monitoring Wells As-Built Plan, prepared by Mount Hope Engineering, Todd Chaplin, P.E. and dated 12/7/07 prepared for Westford Public Schools. Labels identifying each monitoring well's identification in accordance with the above-referenced approved plan shall be affixed to the steel protective casing of each monitoring well. Each monitoring well shall be locked.

The permittee shall monitor, record and report the quality of water in the monitoring wells according to the following schedule and other provisions:

Parameter	Minimum Frequency of Analysis
pH	Monthly
Static Water Level*	Monthly
Specific Conductance	Monthly
Nitrate Nitrogen	Quarterly
Total Nitrogen ($NO_2 + NO_3 + TKN$)	Quarterly
Total Phosphorus** (as P)	Quarterly
Orthophosphate** (as P)	Quarterly
Volatile Organic Compound (US EPA Method #624)	Annually

* Static Water Level shall be expressed as an elevation and be referenced to the surveyed datum established for the site. It shall be calculated by subtracting the depth to the water table from the surveyed elevation of the top of the monitoring well's PVC well casing/riser.

** After one full year of monitoring the Total Phosphorus and Orthophosphate results, MassDEP may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of MassDEP, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors.

3) Any grab sample or composite sample required to be taken less frequently than daily shall be taken during the period of Monday through Friday inclusive. All composite samples shall be taken over the operating day.

The permittee shall submit all monitoring reports within **30 days** of the last day of the reporting month. Reports shall be on an acceptable form, properly filled and signed and shall be sent to: the Deputy Regional Director, Bureau of Resource Protection, Department of

Environmental Protection, Northeast Regional Office, 205B Lowell Street, Wilmington, MA 01887, and to the Program Director, Watershed Permitting, Bureau of Resource Protection, Department of Environmental Protection, One Winter Street/5th Floor, Boston, MA 02108, and to the Westford Board of Health, 23 Depot Street, Westford, MA 01886.

Submission of monitoring reports in electronic format is available through eDEP and serves as data submission to both the Regional and Boston offices. To register for electronic submission go to: *http://www.mass.gov/dep/service/compliance/edeponlf.htm*

C. Supplemental Conditions

1) The permittee shall notify the Department, in writing, within thirty (30) days in advance of the proposed transfer of ownership of the facility for which this permit is written. Said notification shall include a written agreement between the existing and new permittees containing a specific date for transfer of permit, responsibility, coverage and liability between them.

2) A staffing plan for the facility shall be submitted to the Department once every two years and whenever there are staffing changes. The staffing plan shall include the following components:

   a) The operator(s)'s name(s), operator grade(s) and operator license number(s);
   b) The number of operational days per week;
   c) The number of operational shifts per week;
   d) The number of shifts per day;
   e) The required personnel per shift;
   f) Saturday, Sunday and holiday staff coverage;
   g) Emergency operating personnel

3) The permittee is responsible for the operation and maintenance of all sewers, pump stations, and treatment units for the permitted facility, which shall be operated and maintained under the direction of a properly certified wastewater operator.

4) Operation and maintenance of the proposed facility must be in accordance with 314 CMR 12.00, "Operation and Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Discharges", and, 257 CMR 2.00, "Rules and Regulations for Certification of Operators of Wastewater Treatment Facilities.

   a) The facility has been rated (in accordance with 257 CMR 2.00), to be a Grade 4 facility. Therefore, the permittee shall provide for oversight by a Massachusetts Certified Wastewater Treatment plant operator (Chief Operator) Grade 4 or higher. The permittee will also provide for a backup operator who shall possess at least a valid Grade 3 license.
   b) The date and time of the operator's inspection along with the operator's name and certification shall be recorded on the required monthly monitoring reports.

5) If the operation and maintenance of the facility is contracted to a private concern, the permittee shall submit a copy of the contract, consistent with what is required by the approved Operation & Maintenance manual and signed only by the contractor, to the appropriate MassDEP Regional Office within thirty days of permit issuance. Along with the contract, a detailed listing of all contract operation obligations of the proposed contractor at other facilities shall also be submitted.

6) Any additional connections to the sewer system, beyond the 7 town owned buildings (Town Hall, Millenium Center, Library, Police Station, Fire Station, Roudenbush Community Center, Roudenbush Daycare Center) shall be approved by MassDEP and the local Board of Health prior to the connection.

7) All tests or analytical determinations to determine compliance with permit standards and requirements shall be done using tests and procedures found in the most recent version of *Standard Methods for the Examination of Water and Wastewater* and shall be performed by a Massachusetts Certified laboratory.

8) The permittee shall notify the appropriate MassDEP Regional Office, in writing, within thirty (30) days of the following events:

   a) Any interruption of the treatment system operation, other than routine maintenance.
   b) Final shutdown of the treatment system.

9) The permittee shall contract to have any and all solids and sludge generated by the treatment system for which this permit is issued removed off site by a properly licensed waste hauler for disposal at an EPA/MassDEP approved facility. The name and license number of the hauler along with the quantity of wastes removed and the date(s) of removal shall be reported by the permittee in writing to the appropriate MassDEP Regional Office.

10) Simultaneously with the permit renewal application at year fifteen (year 2017) following the initiation of plant operations, the permittee shall submit an engineering report to the Department for its review and approval.The report shall be prepared by a registered professional engineer and outlines in sufficient detail what modifications (if any) to the facility or other changes are required to insure that the facility can remain in compliance with its GWDP and other applicable requirements through the next 5 year permit term (year 20) and beyond.

11) In the event that effluent limits are not met, or the groundwater quality in the down-gradient monitoring wells does not meet the groundwater quality standards for Class I groundwaters, the permittee may be obligated to modify, supplement or replace the permitted treatment process so as to ensure compliance with the groundwater quality standards.

5) If the operation and maintenance of the facility is contracted to a private concern, the permittee shall submit a copy of the contract, consistent with what is required by the approved Operation & Maintenance manual and signed only by the contractor, to the appropriate MassDEP Regional Office within thirty days of permit issuance. Along with the contract, a detailed listing of all contract operation obligations of the proposed contractor at other facilities shall also be submitted.

6) Any additional connections to the sewer system, beyond the 7 town owned buildings (Town Hall, Millenium Center, Library, Police Station, Fire Station, Roudenbush Community Center, Roudenbush Daycare Center) shall be approved by MassDEP and the local Board of Health prior to the connection.

7) All tests or analytical determinations to determine compliance with permit standards and requirements shall be done using tests and procedures found in the most recent version of *Standard Methods for the Examination of Water and Wastewater* and shall be performed by a Massachusetts Certified laboratory.

8) The permittee shall notify the appropriate MassDEP Regional Office, in writing, within thirty (30) days of the following events:

   a) Any interruption of the treatment system operation, other than routine maintenance.
   b) Final shutdown of the treatment system.

9) The permittee shall contract to have any and all solids and sludge generated by the treatment system for which this permit is issued removed off site by a properly licensed waste hauler for disposal at an EPA/MassDEP approved facility. The name and license number of the hauler along with the quantity of wastes removed and the date(s) of removal shall be reported by the permittee in writing to the appropriate MassDEP Regional Office.

10) Simultaneously with the permit renewal application at year fifteen (year 2017) following the initiation of plant operations, the permittee shall submit an engineering report to the Department for its review and approval.The report shall be prepared by a registered professional engineer and outlines in sufficient detail what modifications (if any) to the facility or other changes are required to insure that the facility can remain in compliance with its GWDP and other applicable requirements through the next 5 year permit term (year 20) and beyond.

11) In the event that effluent limits are not met, or the groundwater quality in the down-gradient monitoring wells does not meet the groundwater quality standards for Class I groundwaters, the permittee may be obligated to modify, supplement or replace the

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D. Appeal Rights

This Permit is an action of the Department. Any person aggrieved by this action, may request an Adjudicatory Hearing. A request for a hearing must be made in writing and postmarked within thirty (30) days of the Permit issuance date. Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought.

The Hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority. The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

II. GENERAL PERMIT CONDITIONS

The following conditions apply to all permits:

1. No discharge authorized in the permit shall result in a violation of the Massachusetts Surface Water Quality Standards (314 CMR 4.00) or the Massachusetts Ground Water Quality Standards (314 CMR 6.00), or any amendments thereto. Upon promulgation of any amended standards, this permit may be revised or amended in accordance with such standard and 314 CMR 2.10 and 3.12 or 5.12. For purposes of determining compliance with ground water quality standards, a violation of the ground water quality standards, and the discharge permit, will be determined to occur when any parameter measured in any downgradient well exceeds the applicable criteria listed in 314 CMR 6.06. In those cases where it is shown that a measured parameter exceeds the applicable criteria listed in 314 CMR 6.06 at the upgradient monitoring well, a violation of the ground water quality standards and the discharge permit will be determined to occur when it is shown that a measured parameter in any downgradient well exceeds the level of that same measured parameter in the upgradient well for the same sampling period. A statistical procedure approved by the Department shall be used in determining when a measured parameter exceeds the allowable level.

2. Duty to comply. The permittee shall comply at all times with the terms and conditions of the permit, 314 CMR, M.G.L. c.21 §§ 26 through 53, and all other applicable state and federal statutes and regulations.

3. Standards and prohibitions for toxic pollutants. The permittee shall comply with effluent standards or prohibitions established under PL92-500, Section 307(a) for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

4. Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and equipment installed or used to achieve compliance with the terms and conditions of the permit, and in accordance with 314 CMR 12.00.

5. Duty to halt or reduce activity. Upon reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or discharges or both until the facility is restored or an alternative method of treatment is provided. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

6. Power Failure. In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

   (a) Provide an alternative power source sufficient to operate the wastewater control facilities; or
   (b) Halt, reduce or otherwise control production and/or primary discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

7. Duty to mitigate. The permittee shall take all reasonable steps to minimize or prevent any adverse impact on human health or the environment resulting from non-compliance with the permit.

8. Duty to provide information. The permittee shall furnish to the Department within a reasonable time any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine whether the permittee is complying with the terms and conditions of the permit.

9. Inspection and entry. The permittee shall allow the Department or its authorized representatives to:

   (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records required by the permit are kept;
   (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit; and
(d) Sample or monitor at reasonable times for the purpose of determining compliance with the terms and conditions of the permit.

10. Monitoring. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless other test procedures are specified in the permit.

11. Record keeping. The permittee shall retain records of all monitoring information including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and all records of all data used to complete the application for the permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

Records of monitoring information shall include:

(a) The date, exact place, and time of sampling or measurements;
(b) The individual(s) who performed the sampling or measurement;
(c) The date(s) analyses were performed;
(d) The individual(s) who performed the analysis;
(e) The analytical techniques or methods used; and
(f) The results of such analyses.

12. Prohibition of bypassing. Except as provided in 314 CMR 5.19(13), bypassing is prohibited and the Department may take enforcement action against a permittee for bypassing, unless the discharge is to a surface water and:

(a) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention or untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(c) The permittee submitted notice of the bypass to the Department:
1. In the event of an anticipated bypass at least ten (10) days in advance, if possible; or
2. In the event of an unanticipated bypass as soon as the permittee has knowledge of the bypass and no later than twenty-four (24) hours after its first occurrence.

13. Bypass not exceeding limitations. The permittee may allow a bypass to occur which does not cause effluent limitations to be exceeded, but only if necessary for the performance of essential maintenance or to assure efficient operation of treatment facilities.

14. Permit actions. The permit may be modified, suspended, or revoked for cause. The filing of a request by the permittee for a permit modification, reissuance, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit conditions.

15. Duty to reapply. If the permittee wishes to continue an activity regulated by the permit after the expiration date of the permit, the permittee must apply for and obtain a new permit. The permittee shall submit a new application at least one hundred and eighty (180) days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department.

16. Property rights. The permit does not convey any property rights of any sort or any exclusive privilege.

17. Other laws. The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, nor does it relieve the permittee of its obligation to comply with any other applicable Federal, State and local laws and regulations.

18. Oil and hazardous substance liability. Nothing in the permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under PL 92-500, Section 311 and M.G.L. c. 21E.

19. Removed substances. Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed in a manner consistent with applicable Federal and State laws and regulations including, but not limited to, the State and Federal Acts, the Massachusetts Hazardous Waste Management Act, M.G.L. c.21C, and the federal Resource Conservation and Recover Act, 42 U.S.C. §6901, et seq. 310 CMR 19.00 and 30.000, and other applicable regulations.

20. Reporting requirements:

    (a) Monitoring Reports. Monitoring results shall be reported on a Discharge Monitoring Report (DMR) at the intervals specified elsewhere in the permit. If the permittee monitors any pollutant more frequently than required by the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

    (b) Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance

schedule of the permit shall be submitted no later than fourteen (14) days following each schedule date.

(c) Planned changes. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility or activity which could significantly change the nature or increase the quantity of pollutants discharged. Unless and until the permit is modified, any new or increased discharge in excess of permit limits or not specifically authorized by the permit constitutes a violation.

(d) Anticipated non-compliance. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

(e) Twenty-four (24) hour reporting. The permittee shall report any non-compliance which may endanger health or the environment. Any information shall be provided orally within twenty-four (24) hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is anticipated to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance.

The following shall be included as information which must be reported within twenty-four (24) hours:

1. Any unanticipated bypass which exceeds any effluent limitation in the permit.

2. Violation of a discharge limitation for any of the pollutants listed by the Department in the permit to be reported within twenty-four (24) hours.

(f) Other non-compliance. The permittee shall report all instances of non-compliance not reported under 314 CMR 5.19(20)(a), (b) or (e) at the time monitoring reports are submitted. The reports shall contain the information listed in 314 CMR 5.19(20)(e).

(g) Toxics. All manufacturing, commercial, mining, or silvicultural dischargers must notify the Department as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge of any toxic pollutant listed in 314 CMR 3.16 which is not limited in permit, if that discharge will exceed the highest of the following notification levels:

a. One hundred micrograms per liter (100 μg/l);

b. Two hundred micrograms per liter (200 μg/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 μg/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter 1 mg/l) for antimony;

c. Five (5) times the maximum concentration value reported for that pollutant in the permit application; or

2. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

(h) Indirect dischargers. All Publicly Owned Treatment Works shall provide adequate notice to the Department of the following:

1. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to PL 92-500, §301 or 306 if it were directly discharging those pollutants; and

2. Any substantial change in the volume or character of pollutants being introduced into the POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

3. For purposes of 314 CMR 5.19, adequate notice shall include information on the quality and quantity of effluent introduced into the POTW, and any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

(i) Information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

21. Signatory requirement. All applications, reports, or information submitted to the Department shall be signed and certified in accordance with 314 CMR 3.14 and 5.14.

22. Severability. The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

23. Reopener clause. The Department reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance,

invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

23. Reopener clause. The Department reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the State or Federal Acts in order to bring all discharges into compliance with said statutes.

24. Approval of plans and specifications for treatment works. All discharges and associated treatment works authorized herein shall be consistent with the terms and conditions of this permit and the approved plans and specifications. Any modification to the approved treatment works shall require written approval of the Department.

25. Transfer of permits.

    (a) RCRA facilities. Any permit which authorizes the operation of a RCRA facility which is subject to the requirements of 314 CMR 8.07 shall be valid only for the person to whom it is issued and may not be transferred.

    (b) Transfers by modification. Except as provided in 314 CMR 5.19(25)(a) and (c) a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued or a minor modification made to identify the new permittee.

    (c) Automatic transfers. As an alternative to transfers under 314 CMR 5.19(25)(b), any permit may be automatically transferred to a new permittee if:

        1. The current permittee notifies the Department at least thirty (30) days in advance of the proposed transfer date in 314 CMR 5.19(25)(c)2.

        2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them; and

        3. The Department does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit. A modification under 314 CMR 5.19(25) may also be a minor modification. If this notice is not received, the transfer is effective on the date specified in the agreement mentioned in 314 CMR 5.19(25)(c)2.

26. Permit Fees. Any permittee, other than a public entity, required to obtain a surface water or ground water discharge permit pursuant to M.G.L. c.21, s.43 and 314 CMR 3.00 and 5.00, shall be required annually to obtain an inspection certificate from the Department and submit the information and fee associated therewith in accordance with 314 CMR 2.12.

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE
205B Lowell Street, Wilmington, MA 01887 • (978) 694-3200

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

MassDEP NERO FACSIMILE TRANSMITTAL FORM

TO:

Date: 5-7-08
Attention: Kathy Auth
Company Name: Westford Public Schools
Company Fax Number: 978-392-4497
Company Phone Number:

FROM:

DEP Contact Person: Lisa Dallaire
DEP Bureau: NERO
Contact Telephone: 978-694-3238
Comments:
Please remove page 6 of the Abbot School Permit and replace it with this new, attached page 6. Also, please let the Westford BoA know of this matter too. Thanks, Lisa

Transmittal Form plus 1 pages.
To report transmission problems call the DEP CONTACT PERSON.
FAX Number for MassDEP NERO is 978-694-3499

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057, TDD Service - 1-800-298-2207.
http://www.mass.gov/dep • Fax (978) 694-3499
Printed on Recycled Paper

5) If the operation and maintenance of the facility is contracted to a private concern, the permittee shall submit a copy of the contract, consistent with what is required by the approved Operation & Maintenance manual and signed only by the contractor, to the appropriate MassDEP Regional Office within thirty days of permit issuance. Along with the contract, a detailed listing of all contract operation obligations of the proposed contractor at other facilities shall also be submitted.

6) Any additional connections to the sewer system, beyond the 7 town owned buildings (Town Hall, Millenium Center, Library, Police Station, Fire Station, Roudenbush Community Center, Roudenbush Daycare Center) shall be approved by MassDEP and the local Board of Health prior to the connection.

7) All tests or analytical determinations to determine compliance with permit standards and requirements shall be done using tests and procedures found in the most recent version of *Standard Methods for the Examination of Water and Wastewater* and shall be performed by a Massachusetts Certified laboratory.

8) The permittee shall notify the appropriate MassDEP Regional Office, in writing, within thirty (30) days of the following events:

   a) Any interruption of the treatment system operation, other than routine maintenance.
   b) Final shutdown of the treatment system.

9) The permittee shall contract to have any and all solids and sludge generated by the treatment system for which this permit is issued removed off site by a properly licensed waste hauler for disposal at an EPA/MassDEP approved facility. The name and license number of the hauler along with the quantity of wastes removed and the date(s) of removal shall be reported by the permittee in writing to the appropriate MassDEP Regional Office.

10) Simultaneously with the permit renewal application at year fifteen (year 2017) following the initiation of plant operations, the permittee shall submit an engineering report to the Department for its review and approval.The report shall be prepared by a registered professional engineer and outlines in sufficient detail what modifications (if any) to the facility or other changes are required to insure that the facility can remain in compliance with its GWDP and other applicable requirements through the next 5 year permit term (year 20) and beyond.

11) In the event that effluent limits are not met, or the groundwater quality in the down-gradient monitoring wells does not meet the groundwater quality standards for Class I groundwaters, the permittee may be obligated to modify, supplement or replace the permitted treatment process so as to ensure compliance with the groundwater quality standards.

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

July 29, 2016

Town of Westford
Attn: Steve Cronin
60 Forge Village Road,
Westford, MA 01886

Re: Individual Groundwater Discharge Permit
Westford (Blanchard) Middle School WWTF,
14 West Street, Westford, MA 01886
Transmittal No: X269235
Permit No: 516-4

Dear Mr. Cronin:

In response to your application for a permit to discharge into the ground a treated effluent from the wastewater treatment facility located at Westford (Blanchard) Middle School, 14 West Street, Westford, MA 01886, and after due public notice, I hereby issue the attached final permit.

No comments objecting to the issuance or terms of the permit were received by the Department during the public comment period. Therefore, in accordance with 314 CMR 2.08, the permit becomes effective on the date of issuance.

Parties aggrieved by the issuance of this permit are hereby advised of their right to request an Adjudicatory Hearing under the provision of Chapter 30A of the Massachusetts General Laws and 314 CMR 1.00, Rules for the Conduct of Adjudicatory Proceedings. Unless the person requesting the adjudicatory hearing requests and is granted a stay of the terms and conditions of the permit, the permit shall remain fully effective.

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

Please contact Nihar R Mohanty at 978-694-3237 should you have any questions regarding issuance of this permit.

Sincerely,

Rachel Freed

Rachel Freed
Deputy Regional Director
Bureau of Water Resources

Enclosures

cc: Westford Board of Health
Onsite Engineering Inc.
DEP/BRP/Wastewater Management Program/Boston
Sandra Rabb, MassDEP/BWR/Boston

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
One Winter Street Boston, MA 02108 • 617-292-5500

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

INDIVIDUAL GROUNDWATER DISCHARGE PERMIT

Name and Address of Applicant: **Town of Westford, 60 Forge Village Road, Westford, MA 01886**

Date of Application:	January 28, 2016
Application/Permit No.	**X269235/516-4**
Date of Issuance:	July 29, 2016
Date of Expiration:	July 29, 2021
Effective Date:	July 29, 2016

AUTHORITY FOR ISSUANCE

Pursuant to authority granted by Chapter 21, Sections 26-53 of the Massachusetts General Laws, as amended, 314 CMR 2.00, and 314 CMR 5.00, the Massachusetts Department of Environmental Protection (the Department or MassDEP) hereby issues the following permit to: **Town of Westford** (hereinafter called "the permittee") authorizing discharges to the ground from the on site wastewater treatment facility located at **the Westford (Blanchard) Middle School, 14 West Street, Westford, Massachusetts**. Such authorization being expressly conditional on compliance by the permittee with all terms and conditions of the permit hereinafter set forth.

Rachel Freed
Rachel Freed
Deputy Regional Director
Bureau of Water Resources

7/29/16
Date

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TTY# MassRelay Service 1-800-439-2370
MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

I. SPECIAL CONDITIONS

A. Effluent Limits

1) The permittee is authorized to discharge into the ground from the wastewater treatment facilities for which this permit is issued a treated effluent whose characteristics shall not exceed the following values:

Effluent Characteristics	Discharge Limitations
Flow	24,000 gpd
Biochemical Oxygen Demand (5 day at 20°C) (BOD_5)	30.0 mg/l
Total Suspended Solids (TSS)	30.0 mg/l
Total Nitrogen (NO_3+NO_2+TKN)	10.0 mg/l
Nitrate-Nitrogen (NO_3)	10.0 mg/l
Fecal Coliform	200 CFU/100 ml
Oil & Grease	15.0 mg/l

a) The pH of the effluent shall not be less than 6.5 nor greater than 8.5 at any time.

b) The discharge of the effluent shall not result in any demonstrable adverse effect on the groundwater or violate any water quality standards that have been promulgated.

c) The monthly average concentration of BOD and TSS in the discharge shall not exceed 15 percent of the monthly average concentrations of BOD and TSS in the influent into the permittee's wastewater treatment facility.

d) When the average annual flow exceeds 80 percent of the permitted flow limitations, the permittee shall submit a report to the Department describing what steps the permittee will take in order to remain in compliance with the permit limitations and conditions, inclusive of the flow limitations established in this permit.

B. Monitoring and Reporting

1) The permittee shall monitor and record the quality of the **influent** and the quality and quantity of the **effluent** prior to discharge to the leaching facilities according to the following schedule and other provisions:

INFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
BOD_5	Monthly	24-hr flow-based composite
TSS	Monthly	24-hr flow-based composite
Total Solids	Monthly	24-hr flow-based composite
Ammonia-Nitrogen	Monthly	24-hr flow-based composite

EFFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
Flow	Daily	Maximum-Minimum-Average
pH	Daily	Grab
UV Intensity	Daily	Continuous Reading
BOD_5	Monthly	24-hr composite
TSS	Monthly	24-hr composite
TS	Monthly	24-hr composite
Fecal Coliform	Monthly	Grab
Nitrate-Nitrogen	Monthly	24-hr composite
Total Nitrogen	Monthly	24-hr composite
Total Phosphorus(as P)	Quarterly	Grab
Orthophosphate (as P)	Quarterly	Grab
Oil & Grease	Monthly	Grab
Volatile Organic Compounds (USEPA Method No. 624)	Annually	Grab

a) After one full year of monitoring the Total Phosphorus and Orthophosphate results, the Department may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of the Department, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors. If the Department reduces the frequency of monitoring for Total Phosphorus and Orthophosphate, the Department reserves the right to resume more frequent monitoring if the Department determines that phosphorus levels are impacting downgradient receptors.

2) The permittee shall continue to monitor, record and report the quality of water in the five downgradient monitoring wells, labeled as: MW1, MW2, MW3, MW4 and MW5 and one upgradient monitoring well: MW6 according to the following schedule and other provisions:

Parameter	Minimum Frequency of Analysis
pH	Monthly
Static Water Level	Monthly
Specific Conductance	Monthly
Nitrate-Nitrogen	Quarterly
Total Nitrogen	Quarterly
Volatile Organic Compounds (USEPA Method No. 624)	Annually
Total Phosphorus (as P)	Quarterly
Orthophosphate (as P)	Quarterly

a) Static Water Level shall be expressed as an elevation and shall be referenced to the surveyed datum established for the site. It shall be calculated by subtracting the depth to the water table from the surveyed elevation of the top of the monitoring well's PVC well casing/riser.

b) After one full year of monitoring the Total Phosphorus and Orthophosphate results, the Department may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of the Department, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors. If the Department reduces the frequency of monitoring for Total Phosphorus and Orthophosphate, the Department reserves the right to resume more frequent monitoring if the Department determines that phosphorus levels are impacting downgradient receptors.

3) Any grab sample or composite sample required to be taken less frequently than daily shall be taken during the period of Monday through Friday inclusive. All composite samples shall be taken over the operating day.

4) The permittee shall submit all monitoring reports within 30 days of the last day of the reporting month. Reports shall be on an acceptable form, properly filled and signed and shall be sent to: the Deputy Regional Director, Bureau of Water Resources, Department of Environmental Protection, 205B Lowell Street, Wilmington, MA 01887, to the Department of Environmental Protection, Bureau of Water Resources, Wastewater Management Program, One Winter Street/5th Floor, Boston, MA 02108, and to the Board of Health, Town Hall, 55 Main Street, Westford, MA 01886.

- Submission of monitoring reports in electronic format is available through eDEP and serves as data submission to both the Regional and Boston offices. To register for electronic submission go to: *http://www.mass.gov/eea/agencies/massdep/service/online/edep-online-filing.html*

C. Supplemental Conditions

1) The permittee shall notify the Department at least thirty (30) days in advance of the proposed transfer of ownership of the facility for which this permit is written. Said notification shall include a written agreement between the existing and new permittees containing a specific date for transfer of permit, responsibility, coverage and liability between them.

2) A staffing plan for the facility shall be submitted to the Department once every two years and whenever there are staffing changes. The staffing plan shall include the following components:

   a) The operator(s)'s name(s), operator grade(s) and operator license number(s);
   b) The number of operational days per week;
   c) The number of operational shifts per week;
   d) The number of shifts per day;
   e) The required personnel per shift;
   f) Saturday, Sunday and holiday staff coverage;
   g) Emergency operating personnel

3) The permittee is responsible for the operation and maintenance of all sewers, pump stations, and treatment units for the permitted facility, which shall be operated and maintained under the direction of a properly certified wastewater operator.

4) Operation and maintenance of the proposed facility must be in accordance with 314 CMR 12.00, "Operation and Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Discharges", and, 257 CMR 2.00, "Rules and Regulations for Certification of Operators of Wastewater Treatment Facilities".

   a) The facility has been rated (in accordance with 257 CMR 2.00), to be a Grade 4 facility. Therefore, the permittee shall provide for oversight by a Massachusetts Certified Wastewater Treatment plant operator (Chief Operator) Grade 4 or higher. The permittee will also provide for a backup operator who shall possess at least a valid Grade 3 license.

   b) The date and time of the operator's inspection along with the operator's name and certification shall be recorded in the log book on location at the treatment facility. All daily inspection logs consistent with the O&M Manual requirements shall be kept at the facility for a period of three (3) years.

   c) Records of operation of wastewater treatment facilities or disposal systems required by the Department shall be submitted on forms supplied by the Department or on

other forms approved by the Department for such use. Monthly reports shall be certified by the wastewater treatment plant operator in charge and shall be included in the discharge monitoring reports submitted each month.

5) If the operation and maintenance of the facility is contracted to a private concern, the permittee shall submit a copy of the contract, consistent with what is required by the approved Operation & Maintenance manual and signed only by the contractor, to the appropriate MassDEP Regional Office within thirty (30) days of permit issuance. Along with the contract, a detailed listing of all contract operation obligations of the proposed contractor at other facilities shall also be submitted.

6) The onsite wastewater treatment facility accepts sanitary wastewater from the Blanchard Middle School and the Norman Day School. Any additional connection(s) to the treatment facility, beyond the two schools served, shall be approved by MassDEP and the local Board of Health prior to the connection.

7) All tests or analytical determinations to determine compliance with permit standards and requirements shall be done using tests and procedures found in the most recent edition of *Standard Methods for the Examination of Water and Wastewater* and shall be performed by a Massachusetts Certified laboratory.

8) The permittee shall notify the appropriate MassDEP Regional Office, in writing, within 24 hours of the following events:

   a) Any interruption of the treatment system operation, other than routine maintenance.
   b) Final shutdown of the treatment system.

9) The permittee shall contract to have any and all solids and sludges generated by the treatment system for which this permit is issued removed off site by a properly licensed waste hauler for disposal at an EPA/MassDEP approved facility. The name and license number of the hauler along with the quantity of wastes removed and the date(s) of removal shall be reported by the permittee in writing to the appropriate MassDEP Regional Office.

10) Simultaneously with the next permit renewal application, the permittee shall submit to the Department for its review and approval an engineering report, prepared by a registered professional engineer, that outlines in sufficient detail what modifications, if any to the facility or other changes are required to insure that the facility can remain in compliance with its Permit and other applicable requirements through the next 5 year permit term (year 2021) and beyond.

11) In the event that effluent limits are not met, or the discharge is determined to impair groundwater quality in accordance with 314 CMR 5.16(1), the permittee may be obligated to modify, supplement or replace the permitted treatment process so as to

ensure that the discharge does not impair the ability of the groundwater to act as an actual or potential source of potable water.

12) Pursuant to M.G.L. Chapter 21A, section 18(a), and 310 CMR 4.03, holders of this Permit may be subject to annual compliance assurance fees as assessed each year on July 1st and invoiced by MassDEP. Failure of the Permit holder to pay applicable annual compliance assurance fees shall result in the automatic suspension of the permit by operation of law under the statute. If fee non-payment continues for sixty days or more, MassDEP has the statutory option of revoking the Permit, denying any other pending permit applications filed by the Permit holder or taking other enforcement action. Permit holders are required to notify MassDEP in writing if they wish to relinquish or transfer a permit. Failure to do so will result in the continued assessment of fees.

E. Appeal Rights

During the thirty (30) day period following issuance of this permit, a Notice of Claim for an Adjudicatory Appeal may be sent by any person aggrieved (the "Petitioner") by the issuance to:

Case Administrator
Office of Appeals and Dispute Resolution
Department of Environmental Protection
One Winter Street/2nd Floor
Boston, MA 02108

310 CMR 1.01(6)(b) requires the Notice of Claim to: include sufficient facts to demonstrate aggrieved person status; state the facts which are grounds for the appeal specifically, clearly and concisely; and, state relief sought. The permit shall become or remain effective at the end of the 30 day appeal period unless the person filing the Notice of Claim requests, and is granted, a stay of its terms and conditions. If a permit is modified under 314 CMR 2.10, only the modified terms and conditions may be subject to an Adjudicatory Appeal. All other aspects of the existing permit shall remain in effect during any such Adjudicatory Appeal.

Per 310 CMR 4.06, the hearing request to the Commonwealth will be dismissed if the filing fee is not paid. Unless the Petitioner is exempt or granted a waiver, a valid check payable to the Commonwealth to Massachusetts in the amount of $100.00 must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The filing fee is not required if the Petitioner is a city, town, county, or district of the Commonwealth, federally recognized Indian tribe housing authority effective January 14, 1994, or any municipal housing authority; or, per MGL 161A s. 24, the Massachusetts Bay Transportation Authority. The Department may waive the adjudicatory hearing filing fee for a

Petitioner who shows that paying the fee will create an undue financial hardship. A Petitioner seeking a waiver must file, along with the hearing request, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

II. GENERAL PERMIT CONDITIONS

The following conditions from 314 CMR 5.16 apply to all individual and general permits:

(1) No discharge authorized in the permit shall cause or contribute to a violation of the Massachusetts Surface Water Quality Standards (314 CMR 4.00) or any amendments thereto. Upon promulgation of any amended standard, this permit may be revised or amended in accordance with such standard and 314 CMR 2.10 and 3.13 or 5.12. Except as otherwise provided in 314 CMR 5.10 (3)(c), 310 CMR 5.10(4)(a)2 and 314 CMR 5.10(9), no discharge authorized in the permit shall impair the ability of the ground water to act as an actual or potential source of potable water. Evidence that a discharge impairs the ability of the ground water to act as an actual or potential source of potable water includes, without limitation, analysis of samples taken in a downgradient well that shows one or more exceedances of the applicable water quality based effluent limitations set forth in 314 CMR 5.10. In those cases where it is shown that a measured parameter exceeds the applicable water quality based effluent limitations set forth in 314 CMR 5.10 at the upgradient monitoring well, evidence that a discharge impairs the ability of the ground water to act as an actual or potential source of potable water is deemed to exist if a measured parameter in any downgradient well exceeds the level of that same measured parameter in the upgradient well for the same sampling period. . A statistical procedure approved by the Department shall be used in determining when a measured parameter exceeds the allowable level.

(2) Duty to comply. The permittee shall comply at all times with the terms and conditions of the permit, 314 CMR 5.00, M.G.L. c. 21, §§ 26 through 53 and all applicable state and federal statutes and regulations.

(3) Standards and prohibitions for toxic pollutants. The permittee shall comply with effluent standards or prohibitions established under § 307(a) of the Federal Act, 33 U.S.C § 1317(a), for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

(4) Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and equipment installed or used to achieve compliance with the terms and conditions of the permit, and the regulations promulgated at 314 CMR 12.00 entitled "Operation and Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Discharges, and 257 CMR 2.00, Rules and Regulations for Certification of Operators of Wastewater Treatment Facilities".

(5) Duty to halt or reduce activity. Upon reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or discharges or both until the facility is restored or an alternative method of

treatment is provided. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

(6) Power Failure. In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

(a) provide an alternative power source sufficient to operate the wastewater control facilities; or

(b) halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

(7) Duty to mitigate. The permittee shall take all reasonable steps to minimize or prevent any adverse impact on human health or the environment resulting from non-compliance with the permit.

(8) Duty to provide information. The permittee shall furnish to the Department within a reasonable time as specified by the Department any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine whether the permittee is complying with the terms and conditions of the permit.

(9) Inspection and entry. The permittee shall allow the Department or its authorized representatives to:

(a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records required by the permit are kept;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit; and

(d) Sample or monitor at reasonable times for the purpose of determining compliance with the terms and conditions of the permit.

(9A) The permittee shall physically secure the treatment works and monitoring wells and limit access to the treatment works and monitoring wells to those personnel required to operate, inspect and maintain the treatment works and to collect samples.

(9B) The permittee shall identify each monitoring well by permanently affixing to the steel protective casing of the well a tag with the identification number listed in the permit.

(10) Monitoring. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless other test procedures are specified in the permit.

(11) Recordkeeping. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous

monitoring instrumentation, copies of all reports required by the permit, and all records of all data used to complete the application for the permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time. Records of monitoring information shall include:

(a) The date, exact place, and time of sampling or measurements;
(b) The individual(s) who performed the sampling or measurement;
(c) The date(s) analyses were performed;
(d) The individual(s) who performed the analyses;
(e) The analytical techniques or methods used; and
(f) The results of such analyses.

(12) Prohibition of bypassing. Except as provided in 314 CMR 5.16(13), bypassing is prohibited, and the Department may take enforcement action against a permittee for bypassing unless:

(a) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
(c) The permittee submitted notice of the bypass to the Department:
1. In the event of an anticipated bypass, at least ten days in advance, if possible; or
2. In the event of an unanticipated bypass, as soon as the permittee has knowledge of the bypass and no later than 24 hours after its first occurrence.

(13) Bypass not exceeding limitations. The permittee may allow a bypass to occur which does not cause effluent limitations to be exceeded, but only if necessary for the performance of essential maintenance or to assure efficient operation of treatment facilities.

(14) Permit actions. The permit may be modified, suspended, or revoked for cause. The filing of a request by the permittee for a permit modification, reissuance, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit condition.

(15) Duty to reapply. If the permittee wishes to continue an activity regulated by the permit after the expiration date of the permit, the permittee must apply for and obtain a new permit. The permittee shall submit a new application at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department in writing.

(16) Property rights. The permit does not convey any property rights of any sort or any exclusive privilege.

(17) Other laws. The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, nor does it relieve the permittee of its obligation to comply with any other applicable Federal, State, and local laws and regulations.

(18) Oil and hazardous substance liability. Nothing in the permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under § 311 of the Federal Act, 33 U.S.C. § 1321, and M.G.L. c. 21E.

(19) Removed substances. Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed in a manner consistent with applicable Federal and State laws and regulations including, but not limited to, the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26 through 53 and the Federal Act, , 33 U.S.C. § 1251 *et seq*, the Massachusetts Hazardous Waste Management Act, M.G.L. c. 21C, and the Federal Resource Conservation and Recovery Act, 42 U.S.C. § 6901, *et seq.*, 310 CMR 19.000 and 30.000, and other applicable regulations.

(20) Reporting requirements.

(a) Monitoring reports. Monitoring results shall be reported on a Discharge Monitoring Report (DMR) at the intervals specified elsewhere in the permit. If the permittee monitors any pollutant more frequently than required by the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

(b) Compliance schedules. Reports of compliance or non-compliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date.

(c) Planned changes. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility or activity which could significantly change the nature or increase the quantity of pollutants discharged. Unless and until the permit is modified, any new or increased discharge in excess of permit limits or not specifically authorized by the permit constitutes a violation.

(d) Anticipated non-compliance. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

(e) 24 hour reporting. The permittee shall report any non-compliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance. The following shall be included as information which must be reported within 24 hours:

1. Any unanticipated bypass which exceeds any effluent limitation in the permit.
2. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit to be reported within 24 hours.

(f) Other non-compliance. The permittee shall report all instances of non-compliance not reported under 314 CMR 5.16(20)(a), (b), or (e) at the time monitoring reports are submitted. The reports shall contain the information listed in 314 CMR 5.16(20)(e).

(g) Toxics. All manufacturing, commercial, mining, or silvicultural dischargers must notify the Department as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge of any toxic pollutant listed in 314 CMR 3.17 which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:
    a. 100 micrograms per liter (100 ug/l);
    b. 200 micrograms per liter (200 ug/l) for acrolein and acrylonitrile; 500 micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
    c. Five times the maximum concentration value reported for that pollutant in the permit application; or
2. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

(h) Indirect dischargers. All Publicly Owned Treatment Works shall provide adequate notice to the Department of the following:

1. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to § 301 or 306 of the Federal Act, 33 U.S.C. § 1311 or 1316, if it were directly discharging those pollutants; and
2. Any substantial change in the volume or character of pollutants being introduced into the POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

(i) Information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

(21) Signatory requirement. All applications, reports, or information submitted to the Department shall be signed and certified in accordance with 314 CMR 3.15 and 5.14.

(22) Severability. The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

(23) Reopener clause. The Department reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26 through 53 or the Federal Act, 33 U.S.C. §1251 *et seq* in order to bring all discharges into compliance with said statutes.

(24) Approval of treatment works. All discharges and associated treatment works authorized herein shall be consistent with the terms and conditions of this permit. Any modification to the approved treatment works shall require written approval of the Department prior to the construction of the modification.

(25) Transfer of Permits.

(a) RCRA facilities. Any permit which authorizes the operation of a RCRA facility which is subject to the requirements of 314 CMR 8.07 shall be valid only for the person to whom it is issued and may not be transferred.
(b) Transfers by modification. Except as provided in 314 CMR 5.16(25)(a) and (c), a permit may be transferred by the permittee to a new owner or operator provided that the permit has been modified or revoked and reissued or a minor modification is made to identify the new permittee in accordance with 314 CMR 5.12(3) and (4).
(c) Automatic transfers. For facilities other than Privately Owned Wastewater Treatment Facilities (PWTFs) that treat at least some sewage from residential uses, hospitals, nursing or personal care facilities, residential care facilities, and/or assisted living facilities, PWTFs that have been required to establish financial assurance mechanism(s) pursuant to 314 CMR 5.15(6), and RCRA facilities subject to the requirements of 314 CMR 8.07, a permit may be automatically transferred in accordance with 314 CMR 5.12(5).

(26) Permit Compliance Fees and Inspection Information. Except as otherwise provided, any permittee required to obtain a surface water or ground water discharge permit pursuant to M.G.L. c. 21, § 43 and 314 CMR 3.00 and 5.00, shall be required to submit the annual compliance assurance fee established in accordance with M.G.L. c. 21A, § 18 and 310 CMR 4.00 as provided in 314 CMR 2.12. The requirement to submit the annual compliance fee does not apply to any local government unit other than an authority. Any permittee required to obtain a surface water or ground water discharge permit pursuant to M.G.L. c. 21, §43 and 314 CMR 3.00 and 5.00 may be required to submit inspection information annually as a condition of the permit as provided in 314 CMR 2.12.

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE
205B Lowell Street, Wilmington, MA 01887 • (978) 694-3200

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

January 16, 2008

Everett V. Olsen, Jr.
Superintendent of Schools
23 Depot Street,
Westford, MA 01886

Re: FINAL GROUNDWATER DISCHARGE PERMIT

At: **Stony Brook Center, 9 Farmer's Way, Westford, MA**
Transmittal No: **W910440**
Permit No: **721-1**

Dear Mr. Olsen:

In response to your application for a permit to discharge into the ground a treated effluent from the wastewater treatment facility located at **Stony Brook Center, 9 Farmer's Way, Westford, MA 01886**, and after due public notice, I hereby issue the attached final permit.

No comments objecting to the issuance or terms of the permit were received by the Department during the public comment period. Therefore, in accordance with 314 CMR 2.08, the permit becomes effective on the date of issuance.

Parties aggrieved by the issuance of this permit are hereby advised of their right to request an Adjudicatory Hearing under the provision of Chapter 30A of the Massachusetts General Laws and 314 CMR 1.00, Rules for the Conduct of Adjudicatory Proceedings. Unless the person requesting the adjudicatory hearing requests and is granted a stay of the terms and conditions of the permit, the permit shall remain fully effective.

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD# 866-539-7622 or 617-574-6868.
http://www.mass.gov/dep • Fax (978) 694-3499
Printed on Recycled Paper

Please contact Lisa Dallaire of my staff at 978-694-3238 should you have any questions regarding issuance of this permit.

Sincerely,

Eric Worrall
Deputy Regional Director
Bureau of Resource Protection

Cc: Marybeth Chubb, MassDEP/ BRP/Groundwater
Westford Board of Health, 25 Depot Street, Westford, MA 01886

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COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE
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Secretary

LAURIE BURT
Commissioner

GROUNDWATER DISCHARGE PERMIT

Name and Address of Applicant: **Westford Public Schools, 23 Depot Street, Westford, MA 01886**

Date of Application: January 29, 2007

Application/Permit No. **W910440/721-1**

Date of Issuance: January 16, 2008

Date of Expiration: January 16, 2013

Effective Date: January 16, 2008

AUTHORITY FOR ISSUANCE

Pursuant to authority granted by Chapter 21, Sections 26-53 of the Massachusetts General Laws, as amended, the following permit is hereby issued to: **Town of Westford, Dept. of Public Schools, Westford, MA** (hereinafter called "the permittee") authorizing discharges to the ground from an advanced on-site sanitary wastewater treatment facility located **at the Stony Brook Center** (aerobic RBC, denitrification filter, U.V. disinfection and subsurface effluent disposal), located at 9 Farmer's Way, Westford. The **Stony Brook Center** includes a Middle School, numerous recreation fields and a public housing townhouse complex (16 Units). Such authorization is expressly conditioned on compliance by the permittee with all terms and conditions of the permit set forth herein. The Stony Brook Center is within a recharge area (Zone II) of a Westford Municipal Drinking Water Well (Cote Well).

1/18/07

Eric Worrall,
Deputy Regional Director,
Bureau of Resource Protection

DATE

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.
http://www.mass.gov/dep • Fax (978) 694-3499
Printed on Recycled Paper

I. SPECIAL CONDITIONS

A. Effluent Limits

The permittee is authorized to discharge into the ground from the wastewater treatment facilities serving the Stony Brook Center for which this permit is issued a treated effluent whose characteristics shall not exceed the following values:

Effluent Characteristics	Discharge Limitations
Flow	22,000 gpd
Biochemical Oxygen Demand (BOD5) (5 Day at 20°C)	30 mg/l
Total Suspended Solids (TSS)	10 mg/l
Nitrate Nitrogen	10 mg/l
Total Nitrogen (NO2 + NO3 + TKN)	10 mg/l
Oil & Grease	15 mg/l
Fecal Coliform	200/100 ml/L
Turbidity	5 NTU

a) The pH of the effluent shall not be less than 6.5 nor greater than 8.5 at any time.

b) The discharge of the effluent shall not result in any demonstrable adverse effect on the groundwater or violate any water quality standards that have been promulgated.

c) The monthly average concentration of BOD and TSS in the discharge shall not exceed 15 percent of the monthly average concentrations of BOD and TSS in the influent into the permittee's wastewater treatment facility.

d) When the average annual flow exceeds 80 percent of the permitted flow limitations, the permittee shall submit a report to the Department describing what steps the permittee will take in order to remain in compliance with the permit limitations and conditions, inclusive of the flow limitations established in this permit.

B. Monitoring and Reporting

1) The permittee shall sample, monitor and record the quality of the **influent** and the quality and quantity of the **effluent** prior to discharge to the leaching facilities according to the following schedule and other provisions:

INFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
BOD5	Monthly	24 Hr. flow based Composite
TSS	Monthly	24 Hr. flow based Composite
Total Solids	Monthly	24 Hr. flow based Composite
Ammonia Nitrogen	Monthly	24 Hr. flow based Composite
Nitrate-Nitrogen	Monthly	24 Hr. flow based Composite
Volatile Org. Compounds (US EPA Method #624)	Annually	Grab

EFFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
Flow	Daily	Reading report Max-Min-Avg
pH	Daily	Grab
UV Intensity	Daily	Reading
BOD	Weekly	24 Hr. Composite
TSS	Weekly	24 Hr. Composite
TS	Weekly	24 Hr. Composite
Nitrate-Nitrogen	Weekly	24 Hr. Composite
Total Nitrogen (NO2+NO3+TKN)	Weekly	24 Hr. Composite
Ammonia-Nitrogen	Weekly	24 Hr. Composite
Sodium	Weekly	24 Hr. Composite
Oil & Grease	Monthly	Grab
Turbidity	Daily	Continuous
Fecal Coliform	2 x Weekly	Grab
Total Phosphorus* (as P)	Quarterly	Grab
Orthophosphate*(as P)	Quarterly	Grab
Volatile Organic Compounds (US EPA Method #624)	Annually	Grab
Metals**	Annually	Grab

** The metals copper, zinc, cadmium, total chromium, lead, mercury, and silver shall be analyzed once a year during a period when school is in session.

*After one full year of monitoring the Total phosphorus and Orthophosphate results, the Department may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of the Department, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors.

2) The permittee shall sample, monitor, record and report the quality of water in the one upgradient monitoring well (OW-201) and three downgradient monitoring wells (OW-202, OW-203 and GZ-112), as shown on a GZA site plan in a transmittal letter to MassDEP dated, August 28, 2003. Labels identifying each monitoring well's identification in accordance with the above-referenced approved plan shall be affixed to the steel protective casing of each monitoring well.

The permittee shall sample, monitor, record and report the quality of water in the monitoring wells according to the following schedule and other provisions:

Parameter	Frequency of Analysis
pH	Monthly
Static Water Level*	Monthly
Specific Conductance	Monthly
Nitrate Nitrogen	Quarterly
Total Nitrogen(NO2 + NO3 + TKN)	Quarterly
Total Phosphorus** (as P)	Quarterly
Orthophosphate** (as P)	Quarterly
Volatile Organic Compounds (US EPA Method #624)	Annually
Sodium	Quarterly

* Static water level shall be expressed as an elevation and be referenced to the surveyed datum established for the site. It shall be calculated by subtracting the depth to the water table from the surveyed elevation of the top of the monitoring well's PVC well casing/riser.

**After one full year of monitoring the Total phosphorus and Orthophosphate results, the Department may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgement of the Department, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors.

3) Any grab sample or composite sample required to be taken less frequently than daily shall be taken during the period of Monday through Friday inclusive. All composite samples shall be taken over the operating day.

The permittee shall submit all monitoring reports within **30** days of the last day of the reporting month. Reports shall be on an acceptable form, properly filled out and signed and shall be sent to: the ***1)*** **Northeast Region Deputy Regional Director, Bureau of Resource Protection, Department of Environmental Protection, 205B Lowell Street, Wilmington, MA 01887** and **2)** to the **Program Director, Watershed Permitting, Bureau of Resource Protection, Department of Environmental Protection, One Winter Street/5th Floor, Boston, MA 02108**, and **3)** to the **Board of Health, Town Hall, Westford, MA 01886.**

Submission of monitoring reports in electronic format is available through eDEP and serves as data submission to both the Regional and Boston offices. To register for electronic submission go to: *http://www.mass.gov/dep/service/compliance/edeponlf.htm*

C. Supplemental Conditions

1. The permittee shall notify the Department at least thirty (30) days in advance of any proposed transfer of ownership of the facility for which this permit is written. Said notification shall include a written agreement between the existing and new permittees containing a specific date for transfer of permit, responsibility, coverage and liability between them.

2. A staffing plan for the facility shall be submitted to the MassDEP once every two years or whenever there are staffing changes, whichever is sooner. The staffing plan shall include the following components:

a) The operator(s)'s name(s), operator grade(s) and operator license number(s);
b) The number of operational days per week;
c) The number of operational shifts per week;
d) The number of shifts per day;
e) The required personnel per shift;
f) Saturday, Sunday and holiday staff coverage;
g) Emergency operating personnel; and
h) A list of other facilities for which the operator(s) is (are) responsible.

3. The permittee is responsible for the operation and maintenance of all sewers, pump stations, and any additional connections to the sewer system and groundwater treatment facility, beyond the 16 residential units, shall be approved by the MassDEP and the local Board of Health prior to the connection.

4. All tests or analytical determinations to determine compliance with permit standards and requirements shall be done using tests and procedures found in the most recent version of *Standard Methods for the Examination of Water and Wastewater* and shall be performed by a Massachusetts certified laboratory.

5. The permittee shall notify the Department, in writing, within thirty (30) days of the following events:

- Any interruption of the treatment system operation, other than routine maintenance.
- Final shutdown of the treatment system.

6. The permittee shall contract to have any and all solids and sludges generated by the treatment system for which this permit is issued removed off site by a properly licensed waste hauler for disposal at an EPA/DEP approved facility. The name and license number of the hauler along with the quantity of wastes removed and the date(s) of removal shall be reported by the permittee in writing to the Department.

7. In the event that effluent limits are not met or the groundwater quality in the downgradient monitoring wells does not meet the groundwater quality standards for Class I groundwater, the permittee may be obligated to modify, supplement or replace the permitted treatment process so as to ensure compliance with the groundwater quality standards.

D. Appeal Rights

This Permit is an action of the Department. Any person aggrieved by this action, may request an Adjudicatory Hearing. A request for a hearing must be made in writing and postmarked within thirty (30) days of the Permit issuance date. Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought.

The Hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority. The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

II. GENERAL PERMIT CONDITIONS

The following conditions apply to all permits:

1. No discharge authorized in the permit shall result in a violation of the Massachusetts Surface Water Quality Standards (314 CMR 4.00) or the Massachusetts Ground Water Quality Standards (314 CMR 6.00), or any amendments thereto. Upon promulgation of any amended standards, this permit may be revised or amended in accordance with such standard and 314 CMR 2.10 and 3.12 or 5.12. For purposes of determining compliance with ground water quality standards, a violation of the ground water quality standards, and the discharge permit, will be determined to occur when any parameter measured in any downgradient well exceeds the applicable criteria listed in 314 CMR 6.06. In those cases where it is shown that a measured parameter exceeds the applicable criteria listed in 314 CMR 6.06 at the upgradient monitoring well, a violation of the ground water quality standards and the discharge permit will be determined to occur when it is shown that a measured parameter in any downgradient well exceeds the level of that same measured parameter in the upgradient well for the same sampling period. A statistical procedure approved by the Department shall be used in determining when a measured parameter exceeds the allowable level.

2. Duty to comply. The permittee shall comply at all times with the terms and conditions of the permit, 314 CMR, M.G.L. c.21 §§ 26 through 53, and all other applicable state and federal statutes and regulations.

3. Standards and prohibitions for toxic pollutants. The permittee shall comply with effluent standards or prohibitions established under PL92-500, Section 307(a) for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

4. Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and equipment installed or used to achieve compliance with the terms and conditions of the permit, and in accordance with 314 CMR 12.00.

5. Duty to halt or reduce activity. Upon reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or discharges or both until the facility is restored or an alternative method of treatment is provided. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

6. Power Failure. In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

   (a) provide an alternative power source sufficient to operate the wastewater control facilities; or

(b) halt, reduce or otherwise control production and/or primary discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

7. Duty to mitigate. The permittee shall take all reasonable steps to minimize or prevent any adverse impact on human health or the environment resulting from non-compliance with the permit.

8. Duty to provide information. The permittee shall furnish to the Department within a reasonable time any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine whether the permittee is complying with the terms and conditions of the permit.

9. Inspection and entry. The permittee shall allow the Department or its authorized representatives to:
   (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records required by the permit are kept;

   (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

   (c) Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit; and

   (d) Sample or monitor at reasonable times for the purpose of determining compliance with the terms and conditions of the permit.

10. Monitoring. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless other test procedures are specified in the permit.

11. Record keeping. The permittee shall retain records of all monitoring information including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and all records of all data used to complete the application for the permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

    Records of monitoring information shall include:

    (a) The date, exact place, and time of sampling or measurements;

    (b) The individual(s) who performed the sampling or measurement;

    (c) The date(s) analyses were performed;

(d) The individual(s) who performed the analysis;

(e) The analytical techniques or methods used; and

(f) The results of such analyses.

12. Prohibition of bypassing. Except as provided in 314 CMR 5.19(13), bypassing is prohibited and the Department may take enforcement action against a permittee for bypassing, unless the discharge is to a surface water and:

    (a) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

    (b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention or untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

    (c) The permittee submitted notice of the bypass to the Department:
        1. In the event of an anticipated bypass at least ten (10) days in advance, if possible; or

        2. In the event of an unanticipated bypass as soon as the permittee has knowledge of the bypass and no later than twenty-four (24) hours after its first occurrence.

13. Bypass not exceeding limitations. The permittee may allow a bypass to occur which does not cause effluent limitations to be exceeded, but only if necessary for the performance of essential maintenance or to assure efficient operation of treatment facilities.

14. Permit actions. The permit may be modified, suspended, or revoked for cause. The filing of a request by the permittee for a permit modification, reissuance, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit conditions.

15. Duty to reapply. If the permittee wishes to continue an activity regulated by the permit after the expiration date of the permit, the permittee must apply for and obtain a new permit. The permittee shall submit a new application at least one hundred and eighty (180) days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department.

16. Property rights. The permit does not convey any property rights of any sort or any exclusive privilege.

17. Other laws. The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, nor does it relieve the permittee of its obligation to comply with any other applicable Federal, State and local laws and regulations.

18. Oil and hazardous substance liability. Nothing in the permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under PL 92-500, Section 311 and M.G.L. c. 21E.

19. Removed substances. Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed in a manner consistent with applicable Federal and State laws and regulations including, but not limited to, the State and Federal Acts, the Massachusetts Hazardous Waste Management Act, M.G.L. c.21C, and the federal Resource Conservation and Recover Act, 42 U.S.C. §6901, et seq. 310 CMR 19.00 and 30.000, and other applicable regulations.

20. Reporting requirements:

    (a) Monitoring Reports. Monitoring results shall be reported on a Discharge Monitoring Report (DMR) at the intervals specified elsewhere in the permit. If the permittee monitors any pollutant more frequently than required by the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

    (b) Compliance schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than fourteen (14) days following each schedule date.

    (c) Planned changes. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility or activity which could significantly change the nature or increase the quantity of pollutants discharged. Unless and until the permit is modified, any new or increased discharge in excess of permit limits or not specifically authorized by the permit constitutes a violation.

    (d) Anticipated non-compliance. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

    (e) Twenty-four (24) hour reporting. The permittee shall report any non-compliance which may endanger health or the environment. Any information shall be provided orally within twenty-four (24) hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five (5) days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is anticipated to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance.

The following shall be included as information which must be reported within twenty-four (24) hours:

1. Any unanticipated bypass which exceeds any effluent limitation in the permit.

2. Violation of a discharge limitation for any of the pollutants listed by the Department in the permit to be reported within twenty-four (24) hours.

(f) Other non-compliance. The permittee shall report all instances of non-compliance not reported under 314 CMR 5.19(20)(a), (b) or (e) at the time monitoring reports are submitted. The reports shall contain the information listed in 314 CMR 5.19(20)(e).

(g) Toxics. All manufacturing, commercial, mining, or silvicultural dischargers must notify the Department as soon as they know or have reason to believe:

1. toxic pollutant listed in 314 CMR 3.16 which is not limited in permit, if that discharge will exceed the highest of the following notification levels:

   a. One hundred micrograms per liter (100 μg/l);

   b. Two hundred micrograms per liter (200 μg/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 μg/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter 1 mg/l) for antimony;

   c. Five (5) times the maximum concentration value reported for that pollutant in the permit application; or

2. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

(h) Indirect dischargers. All Publicly Owned Treatment Works shall provide adequate notice to the Department of the following:

1. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to PL 92-500, §301 or 306 if it were directly discharging those pollutants; and

2. Any substantial change in the volume or character of pollutants being introduced into the POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

3. For purposes of 314 CMR 5.19, adequate notice shall include information on the quality and quantity of effluent introduced into the POTW, and any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

(i) Information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

21. Signatory requirement. All applications, reports, or information submitted to the Department shall be signed and certified in accordance with 314 CMR 3.14 and 5.14.

22. Severability. The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

23. Reopener clause. The Department reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the State or Federal Acts in order to bring all discharges into compliance with said statutes.

24. Approval of plans and specifications for treatment works. All discharges and associated treatment works authorized herein shall be consistent with the terms and conditions of this permit and the approved plans and specifications. Any modification to the approved treatment works shall require written approval of the Department.

25. Transfer of permits.

(a) RCRA facilities. Any permit which authorizes the operation of a RCRA facility which is subject to the requirements of 314 CMR 8.07 shall be valid only for the person to whom it is issued and may not be transferred.

(b) Transfers by modification. Except as provided in 314 CMR 5.19(25)(a) and (c) a permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued or a minor modification made to identify the new permittee.

(c) Automatic transfers. As an alternative to transfers under 314 CMR 5.19(25)(b), any permit may be automatically transferred to a new permittee if:

1. The current permittee notifies the Department at least thirty (30) days in advance of the proposed transfer date in 314 CMR 5.19(25)(c)2.

2. The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage, and liability between them; and

3. The Department does not notify the existing permittee and the proposed new permittee of its (sic) intent to modify or revoke and reissue the permit. A modification under 314 CMR 5.19(25) may also be a minor modification. If this

notice is not received, the transfer is effective on the date specified in the agreement mentioned in 314 CMR 5.19(25)(c)2.

26. Permit Fees. Any permittee, other than a public entity, required to obtain a surface water or ground water discharge permit pursuant to M.G.L. c.21, s.43 and 314 CMR 3.00 and 5.00, shall be required annually to obtain an inspection certificate from the Department and submit the information and fee associated therewith in accordance with 314 CMR 2.12.

gwp721_1Stony_finalpermitR

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
NORTHEAST REGIONAL OFFICE
205B Lowell Street, Wilmington, MA 01887 • (978) 694-3200

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

IAN A. BOWLES
Secretary

LAURIE BURT
Commissioner

February 12, 2010

Mr. Everett V. Olsen, Jr.
Superintendent of Schools
23 Depot Street,
Westford, MA 01886

RECEIVED
FEB 19 2010
Westford Public Schools
Superintendent's Office

RE: GROUNDWATER DISCHARGE PERMIT No. 635-2
DEP Transmittal No.W206394 – Westford Public Schools
Westford Academy High School, 30 Patten Road, Westford, MA

Dear Mr. Olsen:

In response to your application for a permit to discharge into the ground, treated effluent from the existing on-site wastewater treatment facility located at the Westford Academy High School, 30 Patten Road in Westford, Massachusetts, and after due public notice, the MassDEP hereby issues the attached final permit. The public notice appeared in the Lowell Sun on September 23, 2009. The notice in the Central Register of the Secretary of State was published on the same date.

No comments objecting to the issuance or terms of the permit were received by the Division of Wastewater Management during the public comment period. Therefore, in accordance with 314 CMR 2.08, the permit becomes effective upon issuance.

Parties aggrieved by the issuance of this permit are hereby advised of their right to request an Adjudicatory Hearing under the provision of Chapter 30A of the Massachusetts General Laws and 314 CMR 1.00, Rules for the Conduct of Adjudicatory Proceedings. Unless the person requesting the adjudicatory hearing requests and is granted a stay of the terms and conditions of the permit, the permit shall remain fully effective.

As you are aware, MassDEP has inspected the facility, and met with your staff, operations staff, and consulting engineers in regard to upgrades to the treatment facility which are necessary to meet new, more stringent permit limits. On January 6, 2010, Todd Chaplin of Mount Hope Engineering, Inc submitted information on the status of the plant upgrades. Based on review of this information by MassDEP, and a subsequent update on February 10, 2010 provided by Westford Academy staff, the draft permit has been modified to reflect the updated implementation schedule. Please be advised that MassDEP must review and approve design plans prior to construction and installation of the Hydrofilter Discfilter facilities. The schedule for interim permit limits and full compliance with the terms and conditions of the new permit have also been revised accordingly, and have been included in Permit Condition B.4.

If you have any questions on any of the information discussed in this letter, please contact Lisa Dallaire of my staff at (978) 694-3238.

Very truly yours,

Eric Worrall
Deputy Regional Director
Bureau of Resource Protection

Enclosure: Final Permit

cc:
-Westford Board of Health, Town Hall, 55 Main Street, Westford, MA 01886
-Todd Chaplin, Mount Hope Engineering, Inc., 1788 G.A.R. Highway, Swansea, MA 02777
-Marybeth Chubb, DEP/BRP/Watershed Permitting/Boston

COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
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Commissioner

GROUNDWATER DISCHARGE PERMIT

Name and Address of Applicant: Westford Public Schools

Date of Application: January 30, 2008

Application/Permit No. 635-2,

Date of Issuance: February 12, 2010

Date of Expiration: February 12, 2015

Effective Date: February 12, 2010

AUTHORITY FOR ISSUANCE

Pursuant to authority granted by Chapter 21, Sections 26-53 of the Massachusetts General Laws, as amended, the following permit is hereby issued to: Westford Public Schools (hereinafter called "the permittee") authorizing discharges to the ground from the on site wastewater treatment facility located at **Westford Academy, 30 Patten Road, Westford, Ma. Sanitary waste from Robinson School and the Crusafulli School also tie into the Westford Academy wastewater treatment facility.** Such authorization being expressly conditional on compliance by the permittee with all terms and conditions of the permit hereinafter set forth.

Eric Worrall
Deputy Regional Director
Bureau of Resource Protection

2/12/10
Date

This information is available in alternate format. Call Donald M. Gomes, ADA Coordinator at 617-556-1057. TDD Service - 1-800-298-2207.
http://www.mass.gov/dep • Fax (978) 694-3499
Printed on Recycled Paper

I. SPECIAL CONDITIONS

A. Effluent Limits

The permittee is authorized to discharge into the ground from the wastewater treatment facilities for which this permit is issued a treated effluent whose characteristics shall not exceed the following values:

Effluent Characteristics	Discharge Limitations
Flow	32,000 gpd
Biochemical Oxygen Demand (BOD_5) (5 Day at 20°C)	10 mg/l
Total Suspended Solids (TSS)	5 mg/l
Nitrate Nitrogen	5 mg/l
Total Nitrogen (NO_2 + NO_3 + TKN)	10 mg/l
Oil & Grease	15 mg/l
Turbidity	2 NTU
Fecal Coliform*	Non Detect

*** Non-Detect for the purposes of permit compliance shall mean a median of no detectable colonies/100 ml over continuous, running 7 day sampling periods, with no sample exceeding 14 colonies/100ml**

a) The pH of the effluent shall not be less than 6.0 or greater than 9.0 at any time or not more than 0.2 standard units outside the naturally occurring range.

b) The discharge of the effluent shall not result in any demonstrable adverse effect on the groundwater or violate any water quality standards that have been promulgated.

c) The monthly average concentration of BOD and TSS in the discharge shall not exceed 15 percent of the monthly average concentrations of BOD and TSS in the influent into the permittee's wastewater treatment facility.

d) When the average annual flow exceeds 80 percent of the permitted flow limitations, the permittee shall submit a report to MassDEP describing what steps the permittee will take in order to remain in compliance

with the permit limitations and conditions, inclusive of the flow limitations established in this permit.

B. Monitoring and Reporting

1) The permittee shall monitor and record the quality of the **influent** and the quality and quantity of the **effluent** prior to discharge to the leaching facilities according to the following schedule and other provisions:

INFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
BOD_5	Monthly	24-Hr. Composite
TSS	Monthly	24-Hr. Composite
Total Solids (TS)	Monthly	24-Hr. Composite
Ammonia Nitrogen	Monthly	24-Hr. Composite

EFFLUENT:

Parameter	Minimum Frequency of Analysis	Sample Type
Flow	Daily	Reading Report Max-Min-Avg
pH	Daily	Grab
UV Intensity	Daily	Reading
BOD_5	Weekly	24-Hr. Composite
TSS	2/Week	24-Hr. Composite
TS	Weekly	24-Hr. Composite
Nitrate Nitrogen	2/Week	24-Hr. Composite
Total Nitrogen (NO_2 + NO_3 + TKN)	2/Week	24-Hr. Composite
Oil & Grease	Monthly	Grab
Turbidity	Daily	Continuous
Fecal Coliform	Daily	Grab
Total Phosphorus* (as P)	Semi-Annually	Grab
Orthophosphate* (as P)	Semi-Annually	Grab
Volatile Organic Compounds (US EPA Method #624)	Semi-Annually**	Grab
Metals	Quarterly^^	Grab

* After one full year of monitoring the Total Phosphorus and Orthophosphate and Metals results, MassDEP may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of MassDEP, the results of the sampling indicate that existing levels will not adversely impact downgradient receptors.

^^ The metals: copper, zinc, cadmium, and mercury, shall be analyzed quarterly during a period when school is in session.

** Not to be taken during vacation weeks or summer break

2) The permittee shall sample the upgradient monitoring well, MW-1, MW-2(middle of leach field) and the downgradient monitoring wells MW-3, MW-4 and MW-5(within 500 feet of a PWS known as Country Road Well) as shown on the approved plan entitled **Monitoring Wells As-Built Plan, Westford Academy** prepared by **Mount Hope Engineering** and dated **10/29/07**. Labels identifying each monitoring well's identification in accordance with the above-referenced approved plan shall be affixed to the steel protective casing of each monitoring well.

The permittee shall monitor, record and report the quality of water in the monitoring wells according to the following schedule and other provisions:

Parameter	Minimum Frequency of Analysis
pH	Monthly
Static Water Level*	Monthly
Specific Conductance	Monthly
Nitrate Nitrogen	Monthly
Total Nitrogen (NO_2 + NO_3 + TKN)	Monthly
Total Phosphorus** (as P)	Semi-Annually
Orthophosphate** (as P)	Semi-Annually
Volatile Organic Compound (US EPA Method #624)	Quarterly

* Static Water Level shall be expressed as an elevation and be referenced to the surveyed datum established for the site. It shall be calculated by subtracting the depth to

the water table from the surveyed elevation of the top of the monitoring well's PVC well casing/riser.

** After one full year of monitoring the Total Phosphorus and Orthophosphate results, MassDEP may determine, upon the request of the permittee, that the frequency of monitoring may be reduced if, in the judgment of MassDEP, the results of the sampling indicate that existing phosphorus levels will not adversely impact downgradient receptors.

3) Any grab sample or composite sample required to be taken less frequently than daily shall be taken during the period of Monday through Friday inclusive. Grab samples shall be taken between 8:00 a.m. and 3:00 p.m. All composite samples shall be taken over a 24-hour operating day.

4) Permit 635-2 for the Westford Academy includes a **new** limitation for turbidity and **more stringent** effluent limits for Biochemical Oxygen Demand, (BOD_5), Total Suspended Solids, (TSS), and Fecal Coliform. On May 11, 2009, MassDEP received an Implementation Schedule for the four recommendations included in the ***Evaluation Plan for Westford Academy Wastewater Treatment Facility***, dated February 24, 2009. The recommendations in that report include measures to upgrade the wastewater treatment facility to achieve compliance with the new more stringent effluent limitations. On January 8, 2010, MassDEP received a revised Implementation Schedule from Mount Hope Engineering, consultant to Westford Academy. A number of upgrades have been completed as of the date of this permit issuance, but other implementation elements remain. Based on a review of this information, the remaining upgrades shall be completed in accordance with the following schedule:

- On or before March 15, 2010, complete installation of a new Ultraviolet Disinfection unit
- On or before July 15, 2010, complete installation and initiate operation of Hydrotech Drumfilter. Plans and specifications for the work must be approved by MassDEP prior to construction.

All upgrades to the treatment plant and any associated operational modifications shall be in place so that the

facility is in full compliance with the effluent BOD, TSS, Turbidity, and Fecal Coliform limits in Section I.A of this permit **on and after September 1, 2010.**

5) From the effective date of this permit and continuing up until September 1, 2010 **(interim period)**, the permittee shall meet an effluent limitation of 30 mg/l for BOD, 30 mg/l for TSS, and 100 colonies/100 ml for Fecal Coliform.

The permittee shall submit all monitoring reports within 30 days of the last day of the reporting month. Reports shall be on an acceptable form, properly filled and signed and shall be sent to: the Deputy Regional Director, Bureau of Resource Protection, Department of Environmental Protection, Northeast Regional Office, 205B Lowell Street, Wilmington, MA 01887, and to the Program Director, Watershed Permitting, Bureau of Resource Protection, Department of Environmental Protection, One Winter Street/5th Floor, Boston, MA 02108, and to the Board of Health, 23 Depot Street, Westford, MA 01886

Submission of monitoring reports in electronic format is available through eDEP and serves as data submission to both the Regional and Boston offices. To register for electronic submission go to:
http://www.mass.gov/dep/service/compliance/edeponlf.htm

C. Supplemental Conditions

1) The permittee shall notify the Department at least thirty (30) days in advance of the proposed transfer of ownership of the facility for which this permit is written. Said notification shall include a written agreement between the existing and new permittees containing a specific date for transfer of permit, responsibility, coverage and liability between them.

2) A staffing plan for the facility shall be submitted to the Department once every two years or whenever there are staffing changes. The staffing plan shall include the following components:

a) The operator(s)'s name(s), operator grade(s) and operator license number(s);
b) The number of operational days per week;
c) The number of operational shifts per week;
d) The number of shifts per day;
e) The required personnel per shift;

f) Saturday, Sunday and holiday staff coverage;
g) Emergency operating personnel; and
h) A list of other facilities for which the operator(s) is (are) responsible.

3) The permittee is responsible for the operation and maintenance of all sewers, pump stations, and treatment units for the permitted facility, which shall be operated and maintained under the direction of a properly certified wastewater operator.

4) Operation and maintenance of the proposed facility must be in accordance with 314 CMR 12.00, "Operation and Maintenance and Pretreatment Standards for Wastewater Treatment Works and Indirect Discharges", and, 257 CMR 2.00, "Rules and Regulations for Certification of Operators of Wastewater Treatment Facilities.

a) The facility has been rated (in accordance with 257 CMR 2.00), to be a Grade **4** facility. Therefore, the permittee shall provide for oversight by a Massachusetts Certified Wastewater Treatment plant operator (Chief Operator) Grade 4 or higher. The permittee will also provide for a backup operator who shall possess at least a valid Grade 3 license.
b) The date and time of the operator's inspection along with the operator's name and certification, and notes on plant operations shall be recorded on log books kept on site at the treatment facility, and available for inspection by MassDEP staff at any time.

5) If the operation and maintenance of the facility is contracted to a private concern, the permittee shall submit a copy of the contract, consistent with what is required by the approved Operation & Maintenance manual and signed only by the contractor, to the appropriate MassDEP Regional Office within thirty days of permit issuance. Along with the contract, a detailed listing of all contract operation obligations of the proposed contractor at other facilities shall also be submitted.

6) Any additional connections to the sewer system shall be approved by the MassDEP and the local Board of Health prior to the connection.

7) All tests or analytical determinations to determine compliance with permit standards and requirements shall be

done using tests and procedures found in the most recent version of *Standard Methods for the Examination of Water and Wastewater* and shall be performed by a certified laboratory.

8) The permittee shall notify MassDEP's Northeast Regional Office by phone, FAX , or email, within 24 hours the following events:

   a) Any interruption of the treatment system operation, other than routine maintenance.
   b) Final shutdown of the treatment system.

   The permittee shall also provide a written description of these activities in the subsequent monthly discharge monitoring report. In the event of a malfunction of any element of the treatment works, the Permittee shall include a description of all remedial actions taken, and measures to prevent future disruptions of the treatment works.

9) The permittee shall contract to have any and all solids and sludges generated by the treatment system for which this permit is issued removed off site by a properly licensed waste hauler for disposal at an EPA/MassDEP approved facility. The name and license number of the hauler along with the quantity of wastes removed and the date(s) of removal shall be reported by the permittee in writing to the Department.

10) Simultaneously with the permit renewal application at year fifteen (***2013***) following the initiation of plant operations, the permittee shall submit a report to the Department for its review and approval:

   a. An engineering report, prepared by a registered professional engineer, that outlines in sufficient detail what modifications (if any) to the facility or other changes are required to insure that the facility can remain in compliance with its GWDP and other applicable requirements through the next 5 year permit term (year 20) and beyond; and

11) In the event that effluent limits are not met, or the groundwater quality in the down-gradient monitoring wells does not meet the groundwater quality standards for Class I groundwaters, the permittee may be obligated to modify, supplement or replace the permitted treatment process so as

to ensure compliance with the groundwater quality standards.

D. Appeal Rights

This Permit is an action of the Department. Any person aggrieved by this action, may request an Adjudicatory Hearing. A request for a hearing must be made in writing and postmarked within thirty (30) days of the Permit issuance date. Under 310 CMR 1.01(6)(b), the request must state clearly and concisely the facts, which are the grounds for the request, and the relief sought.

The Hearing request along with a valid check payable to the Commonwealth of Massachusetts in the amount of one hundred dollars ($100.00) must be mailed to:

Commonwealth of Massachusetts
Department of Environmental Protection
P.O. Box 4062
Boston, MA 02211

The request will be dismissed if the filing fee is not paid, unless the appellant is exempt or granted a waiver as described below. The filing fee is not required if the appellant is a city or town (or municipal agency), county, or district of the Commonwealth of Massachusetts, or a municipal housing authority. The Department may waive the adjudicatory hearing filing fee for a person who shows that paying the fee will create an undue financial hardship. A person seeking a waiver must file, together with the hearing request as provided above, an affidavit setting forth the facts believed to support the claim of undue financial hardship.

(gwp2-635WestfordAcademy3rdRev1)

II. GENERAL PERMIT CONDITIONS (314 CMR 5.16)

(1) No discharge authorized in the permit shall cause or contribute to a violation of the Massachusetts Surface Water Quality Standards (314 CMR 4.00) or any amendments thereto. Upon promulgation of any amended standard, this permit may be revised or amended in accordance with such standard and 314 CMR 2.10 and 3.13 or 5.12. Except as otherwise provided in 314 CMR 5.10 (3)(c), 310 CMR 5.10(4)(a)2 and 314 CMR 5.10(9), no discharge authorized in the permit shall impair the ability of the ground water to act as an actual or potential source of potable water. Evidence that a discharge impairs the ability of the ground water to act as an actual or potential source of potable water includes, without limitation, analysis of samples taken in a downgradient well that shows one or more exceedances of the applicable water quality based effluent limitations set forth in 314 CMR 5.10. In those cases where it is shown that a measured parameter exceeds the applicable water quality based effluent limitations set forth in 314 CMR 5.10 at the upgradient monitoring well, evidence that a discharge impairs the ability of the ground water to act as an actual or potential source of potable water is deemed to exist if a measured parameter in any downgradient well exceeds the level of that same measured parameter in the upgradient well for the same sampling period. . A statistical procedure approved by the Department shall be used in determining when a measured parameter exceeds the allowable level.

(2) Duty to comply. The permittee shall comply at all times with the terms and conditions of the permit, 314 CMR 5.00, M.G.L. c. 21, §§ 26 through 53 and all applicable state and federal statutes and regulations.

(3) Standards and prohibitions for toxic pollutants. The permittee shall comply with effluent standards or prohibitions established under § 307(a) of the Federal Act, 33 U.S.C § 1317(a), for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

(4) Proper operation and maintenance. The permittee shall at all times properly operate and maintain all facilities and equipment installed or used to achieve compliance with the terms and conditions of the permit, and the regulations promulgated at 314 CMR 12.00 entitled "Operation and Maintenance and Pretreatment

Standards for Wastewater Treatment Works and Indirect Discharges, and 257 CMR 2.00, Rules and Regulations for Certification of Operators of Wastewater Treatment Facilities".

(5) Duty to halt or reduce activity. Upon reduction, loss, or failure of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control production or discharges or both until the facility is restored or an alternative method of treatment is provided. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

(6) Power Failure. In order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

(a) provide an alternative power source sufficient to operate the wastewater control facilities; or

(b) halt, reduce or otherwise control production and/or all discharges upon the reduction, loss, or failure of the primary source of power to the wastewater control facilities.

(7) Duty to mitigate. The permittee shall take all reasonable steps to minimize or prevent any adverse impact on human health or the environment resulting from non-compliance with the permit.

(8) Duty to provide information. The permittee shall furnish to the Department within a reasonable time as specified by the Department any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine whether the permittee is complying with the terms and conditions of the permit.

(9) Inspection and entry. The permittee shall allow the Department or its authorized representatives to:

(a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records required by the permit are kept;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit;

(c) Inspect at reasonable times any facilities, equipment, practices, or operations regulated or required under the permit; and

(d) Sample or monitor at reasonable times for the purpose of determining compliance with the terms and conditions of the permit.

(9A) The permittee shall physically secure the treatment works and monitoring wells and limit access to the treatment works and monitoring wells to those personnel required to operate, inspect and maintain the treatment works and to collect samples.

(9B) The permittee shall identify each monitoring well by permanently affixing to the steel protective casing of the well a tag with the identification number listed in the permit.

(10) Monitoring. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity. Monitoring must be conducted according to test procedures approved under 40 CFR Part 136 unless other test procedures are specified in the permit.

(11) Recordkeeping. The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and all records of all data used to complete the application for the permit, for a period of at least three years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time. Records of monitoring information shall include:

(a) The date, exact place, and time of sampling or measurements;

(b) The individual(s) who performed the sampling or measurement;

(c) The date(s) analyses were performed;

(d) The individual(s) who performed the analyses;

(e) The analytical techniques or methods used; and

(f) The results of such analyses.

(12) Prohibition of bypassing. Except as provided in 314 CMR 5.16(13), bypassing is prohibited, and the Department may take enforcement action against a permittee for bypassing unless:

(a) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if the permittee could have installed adequate backup equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and

(c) The permittee submitted notice of the bypass to the Department:

1. In the event of an anticipated bypass, at least ten days in advance, if possible; or
2. In the event of an unanticipated bypass, as soon as the permittee has knowledge of the bypass and no later than 24 hours after its first occurrence.

(13) Bypass not exceeding limitations. The permittee may allow a bypass to occur which does not cause effluent limitations to be exceeded, but only if necessary for the performance of essential maintenance or to assure efficient operation of treatment facilities.

(14) Permit actions. The permit may be modified, suspended, or revoked for cause. The filing of a request by the permittee for a permit modification, reissuance, or termination, or a notification of planned changes or anticipated non-compliance does not stay any permit condition.

(15) Duty to reapply. If the permittee wishes to continue an activity regulated by the permit after the expiration date of the permit, the permittee must apply for and obtain a new permit. The permittee shall submit a new application at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department in writing.

(16) Property rights. The permit does not convey any property rights of any sort or any exclusive privilege.

(17) Other laws. The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, nor does it relieve the permittee of its obligation to comply with any other applicable Federal, State, and local laws and regulations.

(18) Oil and hazardous substance liability. Nothing in the permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities,

liabilities, or penalties to which the permittee is or may be subject under § 311 of the Federal Act, 33 U.S.C. § 1321, and M.G.L. c. 21E.

(19) Removed substances. Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed in a manner consistent with applicable Federal and State laws and regulations including, but not limited to, the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26 through 53 and the Federal Act, , 33 U.S.C. § 1251 *et seq*, the Massachusetts Hazardous Waste Management Act, M.G.L. c. 21C, and the Federal Resource Conservation and Recovery Act, 42 U.S.C. § 6901, *et seq.*, 310 CMR 19.000 and 30.000, and other applicable regulations.

(20) Reporting requirements.

(a) Monitoring reports. Monitoring results shall be reported on a Discharge Monitoring Report (DMR) at the intervals specified elsewhere in the permit. If the permittee monitors any pollutant more frequently than required by the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.

(b) Compliance schedules. Reports of compliance or non-compliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date.

(c) Planned changes. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility or activity which could significantly change the nature or increase the quantity of pollutants discharged. Unless and until the permit is modified, any new or increased discharge in excess of permit limits or not specifically authorized by the permit constitutes a violation.

(d) Anticipated non-compliance. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in non-compliance with permit requirements.

(e) 24 hour reporting. The permittee shall report any non-compliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within five days of the time the permittee becomes aware of the circumstances. The written submission shall contain a

description of the non-compliance, including exact dates and times, and if the non-compliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the non-compliance. The following shall be included as information which must be reported within 24 hours:

1. Any unanticipated bypass which exceeds any effluent limitation in the permit.

2. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit to be reported within 24 hours.

(f) Other non-compliance. The permittee shall report all instances of non-compliance not reported under 314 CMR 5.16(20)(a), (b), or (e) at the time monitoring reports are submitted. The reports shall contain the information listed in 314 CMR 5.16(20)(e).

(g) Toxics. All manufacturing, commercial, mining, or silvicultural dischargers must notify the Department as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge of any toxic pollutant listed in 314 CMR 3.17 which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:

   a. 100 micrograms per liter (100 ug/l);

   b. 200 micrograms per liter (200 ug/l) for acrolein and acrylonitrile; 500 micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;

   c. Five times the maximum concentration value reported for that pollutant in the permit application; or

2. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

(h) Indirect dischargers. All Publicly Owned Treatment Works shall provide adequate notice to the Department of the following:

1. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to § 301 or 306 of the Federal Act, 33 U.S.C. § 1311 or 1316, if it were directly discharging those pollutants; and

2. Any substantial change in the volume or character of pollutants being introduced into the POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

(i) Information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

(21) Signatory requirement. All applications, reports, or information submitted to the Department shall be signed and certified in accordance with 314 CMR 3.15 and 5.14.

(22) Severability. The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

(23) Reopener clause. The Department reserves the right to make appropriate revisions to the permit in order to establish any appropriate effluent limitations, schedules of compliance, or other provisions which may be authorized under the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26 through 53 or the Federal Act, 33 U.S.C. §1251 *et seq* in order to bring all discharges into compliance with said statutes.

(24) Approval of treatment works. All discharges and associated treatment works authorized herein shall be consistent with the terms and conditions of this permit. Any modification to the approved treatment works shall require written approval of the Department prior to the construction of the modification.

(25) Transfer of Permits.

(a) RCRA facilities. Any permit which authorizes the operation of a RCRA facility which is subject to the requirements of 314 CMR 8.07 shall be valid only for the person to whom it is issued and may not be transferred.

(b) Transfers by modification. Except as provided in 314 CMR 5.16(25)(a) and (c), a permit may be transferred by the permittee to a new owner or operator provided that the permit has been modified or revoked and reissued or a minor modification is made to identify the new permittee in accordance with 314 CMR 5.12(3) and (4).

(c) Automatic transfers. For facilities other than Privately Owned Wastewater Treatment Facilities (PWTFs) that treat at least some sewage from residential uses, hospitals, nursing or personal care facilities, residential care facilities, and/or assisted living facilities, PWTFs that have been required to establish financial assurance

mechanism(s) pursuant to 314 CMR 5.15(6), and RCRA facilities subject to the requirements of 314 CMR 8.07, a permit may be automatically transferred in accordance with 314 CMR 5.12(5).

(26) Permit Compliance Fees and Inspection Information. Except as otherwise provided, any permittee required to obtain a surface water or ground water discharge permit pursuant to M.G.L. c. 21, § 43 and 314 CMR 3.00 and 5.00, shall be required to submit the annual compliance assurance fee established in accordance with M.G.L. c. 21A, § 18 and 310 CMR 4.00 as provided in 314 CMR 2.12. The requirement to submit the annual compliance fee does not apply to any local government unit other than an authority. Any permittee required to obtain a surface water or ground water discharge permit pursuant to M.G.L. c. 21, §43 and 314 CMR 3.00 and 5.00 may be required to submit inspection information annually as a condition of the permit as provided in 314 CMR 2.12.

TOWN OF WESTFORD
XXX SCHOOL WASTEWATER TREATMENT FACILITY

MONTHLY REPORT for Month/Year

Executive Summary:

- any major concerns, outstanding issues, and suggestions for improvements
- As noted below, continued problems exist with the #2 Raw Influent pump. We have had success lately switching to a cutter style pump on stations that experience these types of issues. Please follow the link below to see the pump we've been using. The price is comparable to the pumps currently in use. http://www.youtube.com/watch?v

Equipment:

- Approval for additional work requested for Genset was sent to Power Products. Work will be accomplished at the next PM visit.
- As we noted in 2008, there's been some breakout in the corner of the leach field. Once we get some snow melt, we will inspect the area thoroughly.

Billable charges:

- Repair charges for the effluent check valves as noted in flow data.
- RBC Stillwell float and float tree (rotted) had to be replaced
- Replaced RBC Gearbox Seal and drive belts
- Replaced blower drive belts and inspected blower bearings at the same time
- Continued issues with the Raw Influent Pump #2. Another clog and this time we had to replace the relays. This pump has been a problem for the past several months and we think it may be wise to replace it with a "cutter" style pump to stop the clogging issues.
- In early December we had to pull the Raw Lift Station pump due to clog with a rag. We have had several minor alarms since that we are looking into. They are most likely control related and should not be major.

Effluent Parameters:

2009	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Flow	10,367											
Nitr	2.1											
Phos	1.9											

Limits: Average daily flow (xx gal); Total Nitrogen (xx mg/l); Total Phosphorous (x mg/l). All other parameters during the month were within permit limits.

Maintenance:

- Attached is the Work Order Summary Report for the month. Copies of the individual Work Orders will be filed on site in the maintenance folder.

TOWN OF WESTFORD, MASSACHUSETTS

AGREEMENT

THIS AGREEMENT made this ____ day of _____, 20__ by and between the TOWN OF WESTFORD, a municipal corporation duly organized under the laws of Massachusetts and having a usual place of business at 55 Main Street, Westford, MA 01886, hereinafter referred to as the "TOWN", and _____,[a _____ corporation] having a usual place of business at _____, hereinafter referred to as the "CONTRACTOR".

WITNESSETH:

WHEREAS, the TOWN invited the submission of proposals for the purchase and delivery of _____, hereinafter "the Project"; and

WHEREAS, the CONTRACTOR submitted a Proposal to perform the work required to complete the Project; and

WHEREAS, the TOWN has decided to award the contract therefor to the CONTRACTOR.

NOW, THEREFORE, the TOWN and the CONTRACTOR agree as follows:

1. CONTRACT DOCUMENTS. The Contract Documents consist of this Agreement, the Invitation to Bid, Instructions to Bidders and the CONTRACTOR's Proposal. The Contract Documents constitute the entire Agreement between the parties concerning the work, and all are as fully a part of this Agreement as if attached hereto.

2. THE WORK. The Work consists of _____.

3. TERM OF CONTRACT. This Agreement shall be in effect from _____and shall expire on _____, unless terminated earlier pursuant to the terms hereof.

4. COMPENSATION. The TOWN shall pay, as full compensation for items and/or services furnished and delivered in carrying out this Agreement. Total Bid Price $_____.

5. PAYMENT OF COMPENSATION. The TOWN shall make payments within thirty (30) days after its receipt of Invoice.

6. LIABILITY OF THE TOWN. The TOWN's liability hereunder shall be to make all payments when they shall become due, and the TOWN shall be under no further obligation or liability. Nothing in this Agreement shall be construed to render the TOWN or any elected or appointed official or employee of the TOWN, or their successors in office, personally liable for any obligation under this Agreement.

7. INDEPENDENT CONTRACTOR. The CONTRACTOR acknowledges and agrees that it is acting as an independent contractor for all work and services rendered pursuant to this Agreement, and shall not be considered an employee or agent of the TOWN for any purpose.

8. INDEMNIFICATION. The CONTRACTOR shall indemnify, defend, and hold the TOWN harmless from and against any and all claims, demands, liabilities, actions, causes of actions, costs and expenses, including attorney's fees, arising out of the CONTRACTOR's breach of this Agreement or the negligence or misconduct of the CONTRACTOR, or the CONTRACTOR's agents or employees.

9. INSURANCE. A. The CONTRACTOR shall obtain and maintain during the term of this Agreement the insurance coverage in companies licensed to do business in the Commonwealth of Massachusetts, and acceptable to the TOWN, as set out in Attachment A.

   B. All policies shall identify the TOWN as an additional insured (except Workers' Compensation) and shall provide that the TOWN shall receive written notification at least 30 days prior to the effective date of any amendment or cancellation. Certificates evidencing all such coverages shall be provided to the TOWN upon the execution of this Agreement. Each such certificate shall specifically refer to this Agreement and shall state that such insurance is as required by this Agreement. Failure to provide or to continue in force such insurance shall be deemed a material breach of this Agreement and shall be grounds for immediate termination.

10. ASSIGNMENT. The CONTRACTOR shall not assign, sublet or otherwise transfer this Agreement, in whole or in part, without the prior written consent of the TOWN, and shall not assign any of the moneys payable under this Agreement, except by and with the written consent of the TOWN.

11. TERMINATION. A. Termination for Cause. If at any time during the term of this Agreement the TOWN determines that the CONTRACTOR has breached the terms of this Agreement by negligently or incompetently performing the work, or any part thereof, or by failing to perform the work in a timely fashion, or by failing to perform the work to the satisfaction of the TOWN, or by not complying with the direction of the TOWN or its agents, or by otherwise failing to perform this Agreement in accordance with all of its terms and provisions, the TOWN shall notify the CONTRACTOR in writing stating therein the nature of the alleged breach and directing the CONTRACTOR to cure such breach within ten (10) days. The CONTRACTOR specifically agrees that it shall indemnify and hold the TOWN harmless from any loss, damage, cost, charge, expense or claim arising out of or

resulting from such breach regardless of its knowledge or authorization of the actions resulting in the breach. If the CONTRACTOR fails to cure said breach within ten (10) days, the TOWN may, at its election at any time after the expiration of said ten (10) days, terminate this Agreement by giving written notice thereof to the CONTRACTOR specifying the effective date of the termination. Upon receipt of said notice, the CONTRACTOR shall cease to incur additional expenses in connection with this Agreement. Upon the date specified in said notice, this Agreement shall terminate. Such termination shall not prejudice or waive any rights or action which the TOWN may have against the CONTRACTOR up to the date of such termination, and the CONTRACTOR shall be liable to the TOWN for any amount which it may be required to pay in excess of the compensation provided herein in order to complete the work specified herein in a timely manner. Upon such termination, the CONTRACTOR shall be entitled to compensation for all satisfactory work completed prior to the termination date, as determined by the TOWN.

B. Termination for Convenience. The TOWN may terminate this Agreement at any time for convenience by providing the CONTRACTOR written notice specifying therein the termination date which shall not be sooner than ten days from the issuance of said notice. Upon receipt of said notice, the CONTRACTOR shall cease to incur additional expenses in connection with this Agreement. Upon such termination, the CONTRACTOR shall be entitled to compensation for all satisfactory work completed prior to the termination date, as determined by the TOWN, such payment not to exceed the fair value of the services provided hereunder.

12. INSPECTION AND REPORTS. The TOWN shall have the right at any time to inspect the work of the CONTRACTOR, including the right to enter upon any property owned or occupied by CONTRACTOR, whether situated within or beyond the limits of the TOWN. Whenever requested, CONTRACTOR shall immediately furnish to the TOWN full and complete written reports of his operation under this Contract in such detail and with such information as the TOWN may request.

13. SUCCESSOR AND ASSIGNS. This Agreement is binding upon the parties hereto, their successors, assigns and legal representatives. Neither the TOWN nor the CONTRACTOR shall assign or transfer any interest in the Agreement without the written consent of the other.

14. COMPLIANCE WITH LAWS. The CONTRACTOR shall comply with all Federal, State and local laws, rules, regulations and orders applicable to the work provided pursuant to this Agreement, such provisions being incorporated herein by reference, and shall be responsible for obtaining all necessary licenses, permits, and approvals required for the performance of such work.

15. NOTICE. Any and all notices, or other communications required or permitted under this Agreement, shall be in writing and delivered by hand or mailed postage prepaid, return receipt requested, by registered or certified mail or by other reputable delivery service, to the parties at the addresses set forth on Page 1 or furnished from time to time in writing hereafter by one party to the other party. Any such notice or

correspondence shall be deemed given when so delivered by hand, if so mailed, when deposited with the U.S. Postal Service or, if sent by private overnight or other delivery service, when deposited with such delivery service.

16. SEVERABILITY. If any term or condition of this Agreement or any application thereof shall to any extent be held invalid, illegal or unenforceable by the court of competent jurisdiction, the validity, legality, and enforceability of the remaining terms and conditions of this Agreement shall not be deemed affected thereby unless one or both parties would be substantially or materially prejudiced.

17. GOVERNING LAW. This Agreement shall be governed by, construed and enforced in accordance with the laws of the Commonwealth of Massachusetts and the CONTRACTOR submits to the jurisdiction of any of its appropriate courts for the adjudication of disputes arising out of this Agreement.

18. ENTIRE AGREEMENT. This Agreement, including all documents incorporated herein by reference, constitutes the entire integrated agreement between the parties with respect to the matters described. This Agreement supersedes all prior agreements, negotiations and representations, either written or oral, and it shall not be modified or amended except by a written document executed by the parties hereto.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement on the day and year first above written.

I certify that an appropriation is available in the amount of this Contract.

_____
Town Accountant

TOWN OF __Westford__, MA

By its Town Manager, Jodi Ross

_____
(Signature)

Approved as to Form:

_____
Town Counsel

CONTRACTOR:

_____
(Signature)

_____
(Name and Title)

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