



Haverhill

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April 28, 2014

Environmental Protection Agency
Water Technical Unit (OES04-3)
U.S. EPA - New England, Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912
Attn: Joy Hilton

Massachusetts Department of Environmental Protection
Northeast Regional Office
Bureau of resource Protection
205B Lowell Street
Wilmington, MA 01887

Subject: City of Haverhill NPDES Permit # MA0101621
Infiltration Inflow Report 2013

Dear EPA & DEP:

In accordance with the City of Haverhill's NPDES Permit # **MA0101621**, we are providing this status report as required by item 3 Infiltration/Inflow Plan page 14 of 18. Please note the items in *italic* are taken directly from the NPDES permit followed by a response.

The permittee shall implement a plan to control infiltration and inflow (I/I) to the separate sewer system. The plan shall be kept onsite and shall be made available upon request by EPA or MassDEP. The plan shall describe the permittee's program for preventing infiltration/inflow related effluent limit violations, and all unauthorized discharges of wastewater, including overflows and by-passes due to infiltration/inflow.

The plan shall include:

- An ongoing program to identify and remove sources of infiltration and inflow. The program shall include the necessary funding level and the source(s) of funding.*
- An inflow identification and control program that focuses on the disconnection and redirection of illegal sump pumps and roof down spouts. Priority should be given to removal of public and private inflow sources that are upstream from, and potentially contribute to, known areas of sewer system backups and/or overflows.*



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- *Identification and prioritization of areas that will provide increase aquifer recharge as the results of reduction/elimination of infiltration and inflow to the system.*
- *An educational outreach program for all aspects of I/I control, particularly private inflow.*

Reporting Requirements:

A summary report of all actions taken to minimize I/I during the previous calendar year shall be submitted to EPA and the MassDEP annually, by April 30th of each year. The summary report shall, at a minimum, include:

- *A map and a description of inspection and maintenance activities conducted and corrective actions taken during the previous year.*
- *Expenditures for any infiltration/inflow related maintenance activities and corrective actions taken during the previous year.*
- *A map with areas identified for I/I-related investigation/action in the coming year.*
- *A report of any infiltration/inflow related corrective actions taken as a result of unauthorized discharges reported pursuant to 314 CMR 3.19(20) and reported pursuant to the Unauthorized Discharges section of this permit.*

In past annual I/I reports, the city provided an analysis that indicated, based on an average system wide infiltration and inflow evaluation, that I/I was not excessive in the Haverhill collection system. Based on this analysis, the city requested a waiver of Part 1.F.3 of the City's NPDES Permit and had not completed further I/I investigations.

In response to EPA's May 8, 2013 letter, the city is proceeding to evaluate infiltration/inflow in two discrete areas that have separate sewer and stormwater collection systems. These areas were identified as potential study areas based on data collected during the 2010 Phase II LTCP flow metering program (which showed that the areas had higher flows during high groundwater periods but didn't necessarily exceed state standards for excessive flows per inch-mile). Temporary flow meters to evaluate high I/I in these separated sewer areas will be installed in Spring 2014. Flow isolation of the area and TV inspections of some of these sewers will also be completed in Spring 2014. Analysis of this data and recommendations for sewer rehabilitation or further inspections will be completed by the end of 2014 and will be incorporated into the revised Phase II (LTCP), due in 2015.



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Based on this effort, the city will also determine whether further I/I investigations should be attempted in other separated areas of the system.

If you require additional information, please call me at 978-374-2382.

Sincerely,

Paul J. Jessel
Collection System Supervisor

cc: Mike Stankovich, DPW Director
Robert Ward, Deputy DPW Water/Wastewater
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