Haverhill

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April 27, 2009

Environmental Protection Agency
Region 1
One Congress Street, Suite 1100 (SEW)
Boston, MA 02114-2023
Attn: Joy Hilton

Massachusetts Department of Environmental Protection
Northeast Regional Office
Bureau of Resource Protection
205B Lowell Street
Wilmington, MA 01887
Attn: Nihar Mohanty

Subject: City of Haverhill NPDES Permit # MA0101621
Infiltration Inflow Report 2008

Dear Ms. Hilton and Mr. Mohanty:

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.*

- *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.*

The enclosed document follows a similar methodology as the 2007 submission, which again documented that the Infiltration/ Inflow for 2008 was **2,164 gpdidm** far less than the allowable 4,000 gpdidm.

After your review of the enclosed document the City has demonstrated, by the submittal of this report, that we are not experiencing excessive infiltration/inflow, we respectfully request a waiver of Part 3 Infiltration/Inflow Plan page 14 of 18 of our 2008 NPDES Permit.

Your attention in this matter is greatly appreciated.

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

Sincerely,

Paul J. Jessel
Collection System Supervisor

Enclosure
cc: Mike Stankovich, DPW Director
Robert Ward, Deputy DPW Director
Fred Haffty WWTP Facility Manager

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EXECUTIVE SUMMARY

The City of Haverhill calculated the City Wide Annual Infiltration/Inflow rates using two methods. Method 1 was to breakout the wet days and dry days to arrive at I/I rate **3,232 gpdidm** for the wet weather days and **1,608 gpdidm** for dry days. Method 2 was a calculation for the entire year with a City wide annual Infiltration/Inflow rates **2,164 gpdidm.**

Furthermore, the minimum rehabilitation cost is $48.4 Million and the maximum rehabilitation is $186 Million. The loan payment for 20 years at 2% interest on $48 Million is $2,962,040 per year. This far exceeds the annual **$106,511** transportation and treatment costs.

Analysis of the City of Haverhill collection system flows 2008 clearly indicates the non-existence of excessive infiltration/inflow. All design literature and case studies show that Haverhill's collection system to be operating within acceptable quantities for infiltration/inflow. The findings of the analysis clearly demonstrate that excessive infiltration/inflow does not exist in the City of Haverhill's collection system. Minimum rehabilitation costs are greater than transportation and treatment costs. Therefore, the evaluation phase of the study has not been undertaken.

SECTION 1: COLLECTION SYSTEM DESCRIPTION

1.1. Description of Wastewater Collection System

The City of Haverhill owns and operates a wastewater collection system that conveys wastewater to the City's wastewater treatment plant, which is located on the southern shore of the Merrimack River. Portions of this collection system have been in service since the late 1800s and portions convey both stormwater and wastewater.

The piping network consists of gravity pipe ranging in size from 8 to 72-inches in diameter and force mains ranging in size from 4 to 42-inches. Approximately 37 percent of the service area has combined sewers. The majority of the combined portion of the collection system is located in the older, more densely populated downtown area, along the Merrimack River. Areas further north or south of the Merrimack River tend to be newer and generally include separate sanitary and storm sewers.

1.2. Wastewater Treatment Plant

1.2.1. CSO Phase I Upgrades

Completed in June 2006 comprise the following major components:

- **Main Wastewater Pump Station Upgrades Now Capable of Pumping 60 Mgd.**

A pump station conveys all flow from the terminus of the Bradford interceptor to the treatment plant. This station is designed for a peak flow of 60 mgd with 3 pumps in operation and a fourth pump is available as a standby pump. Connecting the pump station to the WWTP is a 42-inch force main with a length of approximately 3000 feet.

- **Modulating Influent Gate to Control Flow to the Main Wastewater Pump Station**

The potential exists that during extreme high flow and high river elevations the main pump station could become flooded. The modulating gate was installed to prevent flooding from occurring.

- **Supervisory Control And Data Acquisition, (SCADA)**

SCADA provides computer monitoring and control of critical wastewater systems from the main control room and computer terminals throughout the treatment plant. System components are monitored and can be queried through Microsoft Excel Historian. Treatment plant influent flows are monitored at the parshall flume and were queried for this Infiltration/Inflow report.

- **CSO Wet Weather Upgrades**

Throughout the mid 1990's to 2008, the City of Haverhill embark on a program of raising CSO weirs throughout the City, which captured 92 percent of the wet weather events.

Phase I CSO required the City to further treat CSO by upgrading the treatment plant's main pumping station to pump 60 million gallon a day, (MGD); Wet weather by-pass for 40 MGD maximum; Aerated grit facility to capture excessive grit and protect treatment plant equipment; Modified five CSO regulators along the South side of the Merrimack River,(Bradford side). With these upgrades, the City now captures over 97 percent of the wet weather events in Haverhill.

TABLE 1.1: WASTEWATER PLANT DESIGN PARAMETERS

Parameter	Value
Influent Flow (mgd)	
Average	18.1
Maximum Day	39.2
Peak Rate	60
Biochemical oxygen demand (lb/d)	17,650
Total Suspended Solids (lb/d)	18,560

SECTION 2: FLOW COMPONENTS

Sanitary sewer system flow has three components: Base Flow, Infiltration and Inflow.

2.1. BASE FLOW

Base flow can be determined in several ways with varying degrees of accuracy. Water consumptions data adjusted for seasonal peaks, irrigation, unmetered connections, and water meter inaccuracies are often used. Also, minimum flow rates can be measured to estimate infiltration rates, which then can be subtracted from metered flow during dry weather conditions.

2.1.1. DATA SUMMARY WASTEWATER

The City of Haverhill has recently completed a Geographic Information System, (GIS), which was used to obtain the sewer diameters and lengths. **TABLE 2-1: CITY OF HAVERHILL SUMMARY SEWERS WITH CALCULATED INFILTRATION,** gives a summary for the different sewer diameters and sewer lengths with calculated infiltration rates for the entire City.

Sewer services were estimated to be a 6-inch diameter and 4-inch with a length of 80 feet. The following is the calculation use to arrive at the sewer service:

Equation 2-1: (Sewer service length) *(Number of sewer account) = Total footage

Example 2-1: 80*17,420=1,393,600(ft.) half of this length, (696,790-feet) is used for 4-inch and the other half is used for the 6-inch sewer service diameter.

TABLE 2-1: CITY OF HAVERHILL SUMMARY SEWERS WITH CALCULATED INFILTRATION\INFLOW

Diameter	Total Footage	Miles	Total I/I (gpdidm)
8	437,336	82.83	1,433,687
10	78,774	14.92	322,801
12	185,079	35.05	910,097
14	2,336	0.44	13,403
15	49,808	9.43	306,153
16	418	0.08	2,740
18	32,907	6.23	242,721
20	7,118	1.35	58,340
21	12,441	2.36	107,055
22	2,007	0.38	18,089
24	30,477	5.77	299,731
30	23,950	4.54	294,425
32	1,538	0.29	20,171
36	10,993	2.08	162,174
42	2,884	0.55	49,631
48	11,060	2.09	217,548
50	5,251	0.99	107,580
54	4,950	0.94	109,536
60	6,248	1.18	153,624
66	7,058	1.34	190,874
72	1,419	0.27	41,856
84	588	0.11	20,238
4	696,790	131.97	1,142,120
6	696,790	131.97	1,713,180
Totals	**2,308,219**	**437**	**7,937,775**

Haverhill's annual I/I rate for 2008 (gpdidm)	**2,164**
Average sewer service diam. (in.)	**4 and 6**
Estimate sewer service length (ft)	**80**
# Accounts:	**17,420**

2.1.2 CITY OF HAVERHILL WATER/WASTEWATER ACCOUNTS

Water and Wastewater meter readings were obtained from the Water and Wastewater Billing Office. These records were broken out into Residential and Commercial accounts that have City water and City sewerage. In addition Commercial and Residential accounts that have City water

but **no** City sewerage. This analysis revealed that currently the City of Haverhill has 17,420 Commercial and Residential sewer accounts.

Haverhill Paperboard (HPB) domestic and industrial flows are pumped directly into the City's force main. HPB is billed separately for domestic sewerage, (as a residential user) as well as industrial process flows. HPB water and sewerage flows were subtracted from the sewer accounts totals.

2.1.3. CSO PHASE I STUDY

Phase I of the Combine Sewer Overflow study required the City to developed a Supervisory Control And Data Acquisition (SCADA), system, completed in June 2006. The SCADA system was queried to obtain daily flows to the Haverhill Water Pollution Control Facility (HWPCF) for the entire calendar year of 2008.

2.1.4. WASTEWATER ACCOUNTS NOT INCLUDED

HWPCF receives flows from the Town of Groveland that is pumped into the HWPCF's force main. HWPCF receives flows from HPB, which also is pumped into the HWPCF's force main. Table 2.2 shows the daily flow rate for Groveland and HPB. These flows are subtracted from the HWPCF daily flow rates.

TABLE 2.2 GROVELAND AND HAVERHILL PAPERBOARD DAILY FLOWS 2008

MONTH	Days	GROVELAND	Gallons/ Day		HPB CORP.	Gallons/ Day
JAN.	31	6.68 MG	215,470.97		1.86	60,141.94
FEB.	29	12.63 MG	435,596.55		1.45	49,944.83
MAR.	31	13.63 MG	439,700.00		1.73	55,887.10
APRIL	30	8.68 MG	289,220.00		1.18	39,290.00
MAY	31	7.02 MG	226,506.45		1.59	51,180.65
JUNE	30	4.73 MG	157,506.67		1.33	44,466.67
JULY	31	5.67 MG	182,806.45		1.96	63,145.16
AUG.	31	7.05 MG	227,396.77		2.63	84,932.26
SEPT.	30	10.75 MG	358,396.67		1.26	41,893.33
OCT.	31	7.13 MG	229,922.58		0.77	24,890.32
NOV.	30	6.95 MG	231,686.67		0.00	0.00
DEC.	31	10.87 MG	350,503.23		0.00	0.00
TOTAL:	366	**101.78 MG**			**15.76 MG**	

TABLE 2-3: WASTEWATER FLOWS AFTER GROVELAND AND HAVERHILL PAPER BOARD IS SUBTRACTED

Date	Rainfall	WWTP TOTAL MGD	Groveland Flows	HPB	WWTP FINAL MGD
1/1/08	0.2	10.31	215,471	60,142	10.03
1/2/08	0.05	10.10	215,471	60,142	9.83
1/3/08	0	9.51	215,471	60,142	9.23
1/4/08	0	9.40	215,471	60,142	9.12
1/5/08	0.06	9.42	215,471	60,142	9.14
1/6/08	0.17	9.60	215,471	60,142	9.32
1/7/08	0.15	10.40	215,471	60,142	10.13
1/8/08	0	11.47	215,471	60,142	11.20
1/9/08	0	14.14	215,471	60,142	13.86
1/10/08	0	12.60	215,471	60,142	12.32
1/11/08	1.12	26.74	215,471	60,142	26.46
1/12/08	0	17.48	215,471	60,142	17.21
1/13/08	0	14.30	215,471	60,142	14.02
1/14/08	0	13.79	215,471	60,142	13.52
1/15/08	0.35	12.94	215,471	60,142	12.67
1/16/08	0.01	12.12	215,471	60,142	11.84
1/17/08	0	11.50	215,471	60,142	11.23
1/18/08	0.49	18.59	215,471	60,142	18.32
1/19/08	0	13.39	215,471	60,142	13.12
1/20/08	0	12.45	215,471	60,142	12.17
1/21/08	0	11.83	215,471	60,142	11.56
1/22/08	0	11.72	215,471	60,142	11.45
1/23/08	0	11.72	215,471	60,142	11.45
1/24/08	0	21.99	215,471	60,142	21.72
1/25/08	0	10.34	215,471	60,142	10.07
1/26/08	0	10.18	215,471	60,142	9.90
1/27/08	0	10.11	215,471	60,142	9.84
1/28/08	0.14	10.03	215,471	60,142	9.76
1/29/08	0	9.81	215,471	60,142	9.53
1/30/08	0.03	10.93	215,471	60,142	10.65
1/31/08	0	9.52	215,471	60,142	9.25

2.1.5. WASTEWATER FLOW SUMMARY

Table 2.4 below summarizes the entire flow distribution for the City of Haverhill.

TABLE 2-4: WASTEWATER FLOW SUMMARY 2008

Annual HWPCF Total Flow	**4,714.72 MG**
Average Flow	**12.88 MGD**
HWPCF Average Base Flow	**4.94 MGD**
Average I/I Est. Rate	**7.94 MGD**

2.2. DATA SUMMARY WATER TREATMENT PLANT

Water pumped from the Water Treatment Plant was captured utilizing SCADA. Daily consumption data was queried with the following equation:

Equation 2-2: Daily Finished Water Flow pump daily **minus** storage tank level increasing **plus** storage tank decreases. This equation was used to develop the daily total water consumption rate for all residents regardless if the resident was on city sewerage.

To derive water consumption flows, which are connected to the City's sewerage system, **Table 2-5** and **Equation 2-3** were developed.

Equation: 2-3: Total Actual Water Demand **minus** (Total Actual Water Demand **multiplied by** Variance applied to each day for unaccounted water flows) **multiplied by** (Percentage, base upon flow data, on City sewer).

Example 2-2: January 1: [4.19- (4.19*.0004)] X.8790 = 3.679 MGD water flow consume on city sewerage.

TABLE 2-5: TOTAL WATER FLOW DISTRIBUTION GALLONS FOR 2008

	Water Treatment	Daily MG	Wastewater Treatment	Daily MG
Total Gallons pump from Water Treatment	**2,059,737,226**	**5.63**	**4,714,720,112**	**12.88**
Unaccounted water from ASR 2007 report	**13.60%**			
Unaccounted water usage gallons	279,413,000	**0.76**		
Total gallon use after unaccounted water is subtracted	**1,780,324,226**	**4.86**		
Total Water Gallons Commercial **Not** on Sewer	87,996,216	**0.24**		
Total Water Gallons Residential **Not** on Sewer	124,772,384	**0.34**		
Total Not on Sewer	**212,768,600**	**0.58**		
Total Water Gallons Commercial on Sewer	**639,168,992**	**1.75**	**639,168,992**	**1.75**
Total Water Gallons Residential on Sewer	**837,715,868**	**2.29**	**837,715,868**	**2.29**
Total Public Property Water on sewer not billed	**87,996,216**	**0.24**		**0.00**
Total Gallons on Sewer	**1,564,881,076**	**4.28**	**1,476,884,860**	**4.04**
Percentage, base upon flow data, on City sewer	**87.90%**			
Percentage Not on City Sewer system	11.95%			
Variance applied to each day for water accounts not on sewer	0.04%			
Water flow data was obtained from John D'Aoust Water Treatment Facility manager.				

This equation was used for each day, which is the City's **BASE FLOW** to the Wastewater Treatment Plant. From this **BASE FLOW** infiltration and inflow amounts can be calculated. The Average Base flow for Calendar year 2008 is **4.94 MGD.**

In order to calculate population served, which is on City sewerage Table: 2-6 was developed.

TABLE 2-6: POPULATION SERVED ON CITY'S SEWERAGE SYSTEM

Type of Residential Service Connection (single-family, two-family, etc.)	**Total # of service connections to each Type**	**1 for single family, 2 for two-family, etc.**	**# households**	**2007 Household Commercial Distribution**	
Single- Family:	13,214	1	13,214	13,123	Single- Family:
Two-Family:	1,904	2	3,808	1,910	Two-Family:
Three Family:	460	3	1,380	458	Three Family:
Four or More Family	354	4	1,416	358	Four or More Family
		Totals	**19,818**		
		% on sewer	87.90%		
		Total on sewer	**17,420**		
# of Households	**Average Household Size from DHCD website**		**Population Served**		
	2.51		**43,724**		
Per Captia Flow Rate	gal./per captia	**Population Served**	**Base Flow**		
	113.07	**43,724**	**4.94 MGD**		

This calculation follows a similar calculation taken from Haverhill's 2008 **Public Water Supply Annual Statistical Report, ASR 2008, (PWSID # 312800)** and adjust base upon **87.90%** of water pumped from the Water Treatment Plant is connected to City sewerage system. This table reveals that 43,724 residents are connected to the City sewer system

2.3. INFILTRATION

Infiltration is the water entering a collection system from groundwater sources, through defective pipes, leaking pipe joints, connections and manhole bases and walls. Water entering the system through this route is usually very clean and pollution free.

2.3.1 DRY WEATHER

The City defines dry weather as **a Minimum 72 Hours No Rainfall Over 0.1 Inches.** Utilizing this definition, the annual wet days were recorded. The City of Haverhill records rainfall utilizing a Rainwise Rain Gage, which is recorded in 15-minutes intervals. This gage is use for the City's annual CSO report, Haverhill experienced 146 wet days, and 220 dry weather days for the 2008 calendar year.

Equation 2-4: WWTP Flow MGD **minus** WWTP Base Flow, (this is BASE FLOW from Equation 2-2).

Example 2-3: 1/1/2008 12.32MGD -5.714MGD = 6.61 MGD

Based upon **Equation 2-4** infiltration was calculated for all days which dry weather occurred, 220-days of dry weather. Dry weather is defined as minimum 72 hours no rainfall over 0.1-inches.

TABLE 2-7: DRY WEATHER CONDITIONS 2008

Total Dry Weather (MGD):	1,297.89 MGD
2008 Avg. 220 days dry weather (MGD):	5.90 MGD
2008 avg. base upon 366 days (MGD):	3.55 MGD
Citywide I/I rate using for 220 days 3.14 MGD (gpdidm):	1,608
Number of Dry Weather (days):	220

2.4. INFLOW

Inflow is water discharged to a collection system from roof leaders, cellars, yard drains, combined sewer overflows, catch basins, manhole covers, storm water, and/or surface runoff.

2.4.1. INFLOW CALCULATION

Based upon **Equation 2-2** inflow was calculated for all days which wet weather occurred, 294-days for calendar year 2008.

Equation 2-5: WWTP Flow MGD **minus** WWTP Base Flow, (this is BASE FLOW from Equation 2-3).

Example 2-4: 1/2/2008 9.83 MGD -5.07 MGD = 4.76 MGD

TABLE 2-8: WET WEATHER CONDITIONS 2008

SWMM CSO 2008 (MG):	**122.51 MG**
Total Wet Weather (MGD):	**1,731.28 MGD**
2008 Average base upon 146 days wet weather (MGD):	**11.86 MGD**
2008 Annual average base upon 366 days (MGD):	**4.73 MGD**
Citywide I/I rate using for 146 days 8.53 MGD (gpdidm):	**3,232**
Number of Wet Weather (days):	**146**

2.4.2. COMBINE SEWER OVERFLOW CSO

The City has submitted to EPA and DEP "SWMM Model Calibration and Evaluation of Existing Conditions" report prepared by CDM dated July1998. Total CSO flow from SWMM model was **122.51 MG**. This CSO flow was added to the Inflow section of this analysis.

2.5. EXCESSIVE INFILTRATION/INFLOW

The quantity of infiltration and inflow, which can be economically eliminated from the collection system by rehabilitation, as determined by a cost effectiveness analysis that compares the costs for transportation and treatment of the infiltration/inflow.

According to "DEP Guidelines for Performing Infiltration/Inflow Analyses and Sewer System Evaluation Survey" Revised January 1993, excessive infiltration is 4,000 gallons per day per inch-mile (gpdidm). As can be seen in Table 2.1 Haverhill's total I/I is **2,164 gpdidm,** which clearly demonstrates Haverhill does not have excessive Infiltration/Inflow.

SECTION 3: INFILTRATION/INFLOW

3.1. TRANSPORTATION OPERATION AND MAINTENANCE COSTS

According to EXISTING SEWER EVALUATION & REHABILITATION WEF Manual of Practice FD-6 " To determine whether I/I is excessive, rough cost comparison between transportation and treatment or elimination of I/I through corrective action are made. If I/I is excessive, the next phase should be the sewer system evaluation survey."

3.1.1. VEHICULAR COSTS

The City repairs Collection Division vehicles under Lift Station Account, (LSTA).

3.1.2. LABORER COSTS

The City of Haverhill currently has the following Job Positions, which deal directly with Collection system

Job Position	Current Staff Size
Collection System Supervisor	1
Senior Collection System operator	1
Collection System Operators	4
Highway Department	2

An analysis was conducted for calendar year for all positions mention above, which included any overtime. Base upon this analysis total labor for 2008 equals **$327,524**

3.1.3. GASOLINE

Gasoline usage summary was obtain for each vehicle for Wastewater and broken out to services for Collection Division. The following vehicles are use for the collection division S-10 range pick-up Truck; S-12 F250 Utility Truck; S-13 F350 Utility Truck; S-5 Diesel Mack catch Basin Cleaner, and S-11 diesel Sewer Jet Machine. These records revealed total gasoline usage to be **$12,529.09**

3.1.4. POWER COSTS

National Grid bills for the City main pumping station located at 40 South Mill Street revealed a total power requirement of **$230,199**. To pump the City sewerage it was estimates that 75% of the power was allocated to pumping.

3.1.5. COLLECTION SYSTEM MAINTENANCE

The City of Haverhill has one account devoted to the collections system called Lift Station Account, (LSTA). Review for calendar year 2008 revealed **$ 45,793** was spent on Collection System Maintenance.

3.1.6. DEBT SERVICE

The City has committed to the CSO Phase I and associated treatment plant upgrades, which equal $20.1- Million expenditure. Capital expenditures, which were bonded, were also added to the debt service. Total debt service equals $1,307,000.

3.2. TRANSPORTATION OPERATION & MAINTENANCE COSTS FOR INFILTRATION/INFLOW

Table 3-1: below represent the transportation costs to pump infiltration and inflow to HWPCF base upon Energy and Operation and Maintenance of the Collection system.

TABLE 3-1: INFILTRATION/INFLOW O & M COSTS

INFILTRATION/INFLOW
HWPCF WASTEWATER TRANSPORTATION O & M COSTS

TOTAL WASTEWATER TRANSPORTATION O & M COSTS

ITEM	2008	COMMENTS
Labor	$452,076	base cost, independent of flow
Gasoline	$12,529	
Energy	$ 230,468.17	75% of cost is flow driven
CS Maint	$54,341	
Interest on CS Capital	$1,307,274	Capital Projects for Collection System and CSO phase I
Total:	**$2,056,688**	
days/year	366	
avg Q, gpd	12,881,749	average daily plant flow includes inflow
factor	1000	
cost/1000gals/day	**$0.436**	wastewater transportation costs per 1000gals/day

ACTUAL COSTS TO PUMP WASTEWATER

ENERGY	$ 230,468.17	75% of cost is flow driven
	$172,851	annual cost to actually pump wastewater
days/year	366	
avg Q, gpd	12,881,749	average daily plant flow
factor	1000	
cost/1000gals/day	**$0.037**	wastewater transportation costs per 1000gals/day

COST TO PUMP INFILTRATION/INFLOW

cost/1000gals/day	**$0.037**	wastewater transportation costs per 1000gals/day
I/I in 1000gals/day	7,937.775	Avg. annual I/I in 1000gals/day
days/year	366	
cost to pump I/I	**$106,511**	annual cost to pump I/I wastewater

3.3. REHABILITATION COSTS

According to "***EPA Handbook Sewer System Infrastructure Analysis and Rehabilitation***" 1991, Chapter 6 provides sewer rehabilitation costs for the following type of sewer rehabilitation:
Excavation; Grouting; Sliplining using HDPE; Sliplining using PE pipe; Sliplining using Thermosetting Resin; Cured-in-Place.

Table 3-2 lists these rehabilitation costs for 1991 costs. The items in blue were estimated costs as the EPA manual did not have a costs. Not included are manhole rehabilitation costs. The minimum rehabilitation cost is $48.4 Million and the maximum rehabilitation is $186 Million. The loan payment for 20 years at 2% interest on $48 Million is $2,962,040 per year. This far exceeds the **$106,511** transportation and treatment costs.

TABLE 3-2: CITY OF HAVERHILLSEWER REHABILITION COSTS

		Excavation Costs		Grouting Costs		Sliplining with HDPE		Sliplining with PE Pipe		Sliplining Thermosetting Resin		Cured in Place					
Dia.	Total Footage	Low	High	Low	High	Low	High	Low	High	Low	High	Low	High	Min	MAX	Min	MAX
		($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	($/LF)	Costs	Costs
8	437,336	$ 50	$ 75	$ 24	$36	$9	$20	$40	$60	$25	$30	$45	$60	$9	$75	$3,936,020	$32,800,167
10	78,774	$ 55	$ 85	$ 28	$42	$17	$33	$45	$70	$33	$43	$60	$75	$17	$85	$1,339,166	$6,695,831
12	185,079	$ 65	$ 95	$ 32	$48	$25	$45	$50	$75	$40	$55	$68	$100	$25	$100	$4,626,969	$18,507,877
14	2,336	$ 70	$ 105	$ 34	$51	$27	$48	$55	$80	$45	$58	$75	$125	$27	$125	$61,914	$292,045
15	49,808	$ 73	$ 108	$ 36	$54	$28	$51	$58	$83	$50	$62	$80	$131	$28	$131	$1,394,619	$6,524,823
16	418	$ 75	$ 110	$ 38	$57	$30	$55	$60	$95	$55	$65	$85	$138	$30	$138	$12,536	$57,668
18	32,907	$ 80	$ 120	$ 40	$60	$33	$68	$65	$80	$63	$75	$90	$145	$33	$145	$1,069,469	$4,771,475
20	7,118	$ 95	$ 145	$ 49	$81	$35	$70	$69	$92	$70	$85	$95	$153	$35	$153	$249,146	$1,085,564
21	12,441	$ 105	$ 160	$ 68	$102	$42	$82	$72	$103	$75	$87	$100	$160	$42	$160	$522,502	$1,990,484
22	2,007	$ 115	$ 175	$ 72	$90	$49	$94	$75	$115	$80	$88	$105	$175	$49	$175	$98,321	$351,146
24	30,477	$ 125	$ 190	$ 76	$95	$56	$106	$95	$135	$85	$90	$110	$190	$56	$190	$1,706,706	$5,790,610
30	23,950	$ 135	$ 205	$ 96	$144	$63	$118	$115	$155	$100	$130	$135	$220	$63	$220	$1,508,843	$5,268,975
32	1,538	$ 160	$ 225	$ 110	$165	$70	$130	$135	$175	$115	$140	$140	$250	$70	$250	$107,680	$384,571
36	10,993	$ 185	$ 245	$ 124	$186	$80	$155	$155	$190	$130	$150	$155	$270	$80	$270	$879,464	$2,968,190
42	2,884	$ 210	$ 265	NA	NA	$93	$193	$190	$230	$145	$175	$165	$305	$93	$305	$266,746	$879,541
48	11,060	$ 235	$ 285	NA	NA	$105	$230	$220	$275	$170	$200	$185	$350	$105	$350	$1,161,324	$3,871,079
50	5,251	$ 238	$ 288	NA	NA	NA	NA	$240	$302	$180	$208	$195	$370	$180	$370	$945,113	$1,942,733
54	4,950	$ 240	$ 295	NA	NA	NA	NA	$265	$329	$190	$215	$205	$390	$190	$390	$940,522	$1,930,545
60	6,248	$ 275	$ 340	NA	NA	NA	NA	$290	$355	$215	$255	NA	NA	$215	$355	$1,343,375	$2,218,131
66	7,058	$ 310	$ 395	NA	NA	NA	NA	$333	$403	$215	$275	NA	NA	$215	$403	$1,517,372	$2,844,189
72	1,419	$ 365	$ 450	NA	NA	NA	NA	$375	$460	NA	NA	NA	NA	$365	$460	$517,809	$652,582
84	588	$ 415	$ 505	NA	NA	NA	NA	$457	$494	NA	NA	NA	NA	$415	$505	$244,000	$296,915
6	1,199,200	$ 45	$ 70	$ 20	$ 30	NA	NA	$35	$60	NA	NA	$30	$45	$20	$70	$23,984,000	$83,944,000
														Totals:		$48,433,614	$186,069,140

Minimum Rehab finance annual costs: ($2,962,040.89)

3.4. CONCLUSIONS

The City of Haverhill has clearly demonstrated that there is no Infiltration/Inflow problem. DEP states that excessive I/I is greater than **4,000 gpdidm**, the I/I rate for the City of Haverhill is **2,164 gpdidm** for 2008 calendar year.

Analysis of the City's collection system for 2008 clearly indicates the non-existence of excessive infiltration/inflow. All design literature and case studies show that the City's collection system to be operating within acceptable quantities for infiltration/inflow. Therefore, the evaluation phase of the study has not been undertaken.

Transportation and treatment costs are **$106,511** per year and rehabilitation costs for full implementation is **$2,292,040** per year.

3.5. WAIVER REQUEST

Since, we have demonstrated by the submittal of this report, that we are not experiencing excessive infiltration/inflow, we respectfully request a waiver Part 3 Infiltration/Inflow Plan page 14 of 18 of our 2008 NPDES Permit, which is appended to this report.

3.6. REFERENCES

"Sewer System Infrastructure Analysis and Rehabilitation" United States Environmental Protection Agency EPA/625/6-91/030 October 1991 Chapter 6 Sewer System Rehabilitation

"DEP Guidelines for Performing Infiltration/Inflow Analyses And Sewer System Evaluation Survey" Revised January, 1993

"Manual of Practice FD-6; *Existing Sewer Evaluation & Rehabilitation.* Water Pollution Control Federation (1983)

2. Alternate Power Source: In order to maintain compliance with the terms and conditions of this permit, the permittee shall continue to provide an alternative power source with which to sufficiently operate its treatment works (as defined at 40 CFR §122.2).

3. Infiltration/Inflow Control Plan:

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.
- Identification and prioritization of areas that will provide increased aquifer recharge as the result of reduction/elimination of infiltration and inflow to the system.
- An educational public 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.