



City of
GREENFIELD, MASSACHUSETTS



OFFICE OF THE MAYOR

WILLIAM F. MARTIN

Mayor

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January 15, 2019

Daniel Kurpaska
Wastewater Management, Bureau of Water Resources
Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

RE: Administrative Consent Order – ACOP-WE-16-1N001

Dear Mr. Kurpaska,

The City of Greenfield is formally requesting a two year extension of time to January 31, 2021 in order to fully comply with the above referenced administrative consent order issued on March 24, 2016 and executed on May 11, 2016. The City was given a deadline of January 31, 2019 to comply with all of the conditions listed in the consent order. Although the City has made significant progress towards meeting these conditions, additional time is needed to address the City's infiltration/inflow issues. The City has taken the following actions since issuance of this consent order.

Working with a qualified professional engineer registered in Massachusetts experienced in wastewater treatment and sewage collection systems:

In March of 2016, the City hired Tata & Howard to perform a continuous flow monitoring and analysis of the City's sewer collection system at a cost of \$147,900. This was done in accordance with the MassDEP Guidelines for Performing Infiltration/Inflow Analyses and Sewer System Evaluation Survey. The final report was issued in November of 2016 and identified ten specific sub-basins for further analysis. The City has gotten a proposal from Wright-Pierce for a comprehensive SSES infiltration and inflow investigation program for these and one additional identified sub-basins. The estimated cost is \$492,000, broken down into two phases; Phase 1 - \$285,000 and Phase 2 - \$207,000.

Discharge monitoring of structures referenced in Section II.5.L.M:

1. Regulator Chamber, rear 302 Deerfield Street. Overflow weir, main interceptor to WPCF:
A block and string was installed as required. However, this did not hold up and was lost during an event. As an alternative monitoring mechanism, a retrievable mechanical pipe plug has been lodged in the outlet pipe.

2. Overflow East Greenfield Pump Station, 156 Montague City Road, Pump Station high wet well relief:
In May of 2017, the City contracted with Northern Construction Service, LLC to replace the East Greenfield Pump Station. The overflow was eliminated. As part of this contract, the Tyler Place Pump Station was also replaced for a total cost of \$996,750.
3. 147-149 School Street, rear. Overflow weir as cross over between storm sewer and sanitary sewer:
In October of 2016, the City contracted with S.U.R. Construction West, Inc. to eliminate this cross connection as part of the Maple Brook Sewer & Drain Rehabilitation Project. The drain was separated from the sewer and new structures were installed.
4. 147-149 School Street, parking area, large break in pipe allowing water into sanitary sewer:
As part of the Maple Brook Sewer & Drain Rehabilitation Project, this pipe and SMH were replaced. The cost of this work was \$121,452. A significant amount of storm water entering into the sanitary sewer system from the Maple Brook Culvert has been eliminated.
5. Leyden Woods Pump Station. No manufactured overflow. The wet well has a maintenance manhole that will relieve in the event of station malfunction:
The replacement of the Leyden Woods Pump Station was originally included in the bid with the replacement of the East Greenfield Pump Station and Tyler Place Pump Station but there were insufficient funds to replace all three. The Greenfield Department of Public Works will be submitting a capital request of \$675,000 this year to replace the Leyden Woods Pump Station. In the meantime, DPW staff conduct routine physical inspections of the wet well to determine if a discharge has taken place.

Sewer Rates:

On January 1, 2017, Greenfield's sewer rate was increased by 3%, which brought it up from \$4.22 per cubic foot to \$4.35 per cubic foot. On January 1, 2018, the sewer rate was increased by another 15%, which brought it up from \$4.35 per cubic foot to \$5.00 per cubic foot. Another rate increase is proposed for July 1, 2019. The amount of the increase has not yet been determined.

Maintenance Staff:

Since the issuance of this consent order in March of 2016, the Greenfield Department of Public Works has had some staff turnover. The Director, Don Ouellette, and two previous City Engineers, Chris Stoddard and Nicolas Reitzel, no longer work for the City. This has added to the difficulty of moving forward a comprehensive plan. The City has created a new Deputy Director position within the DPW. Responsibilities include working with the Water/Wastewater Superintendent, Engineering Superintendent, and the Yard Field Superintendent and Assistant Field Superintendents on oversight of the Collection System Operation and Maintenance Plan. Currently, the Assistant Engineer position is vacant. However, the City plans on replacing this position with a project manager within the engineering division whose duties would include investigating, evaluating and addressing I & I issues within the collection system.

Preventative Maintenance Program:

CCTV Inspection:

A continuing part of the City's I&I Elimination Program is cleaning and televising various mains that have had issues in order to document infiltration and determine the extent of any needed repairs. Part of this program

includes cleaning and televising mains in streets that are on the City's paving program. The City appropriated \$100,000 for 2019 for needed repairs of sewer mains already identified through CCTV inspection.

Review of Problem Sewer Services and Mains:

The City keeps a database of problem sewer mains and services. As part of the City's preventative maintenance program, this database is reviewed on an annual basis. Sewer services that have had regular back-ups are sent an invitation letter to have the service televised by DPW staff. An inspection report is completed with recommendations on repair or replacement. Follow-up letters are sent to owners on the needed repair. The City no longer repairs or renews any portion of a service on private property but will repair or renew the portion within the street layout.

Collection System Mapping:

The Department of Public Works has mapped in GIS the City's collection system and has implemented a SMH inspection program to evaluate and document conditions. This is an on-going program. Based on these inspections, the DPW has replaced or sealed several deteriorated manholes that were determined to be contributing a significant amount of I&I.

Collection System Operation and Maintenance Plan:

The City currently has a Preventative Maintenance (PM) System in place for both the treatment plant and the collection system in a Job Cal work order database. Specific problem mains are on a flushing/root cutting list done on an annual or biannual basis. The City is working on a more formal and comprehensive O & M Plan for the entire collection system.

Public Outreach:

In May of 2016, the City implemented a mandatory Private Source Inflow Removal Program (PSIRP) for residences and businesses with known or suspected basement drain, sump pump or roof connections to the sanitary sewer system. The majority of these illicit connections have been basement drains or sump pumps. The program started with a financial incentive of up to \$500 per house or business to disconnect, which is no longer available. A total of \$41,211.15 has been expended on this program. Prior to May of 2016, the City had implemented a voluntary PSIRP. Public outreach letters were sent to all property owners within Greenfield with a sewer account. A total of around \$92,942 was expended on the voluntary program.

Future Appropriations:

The DPW's five year capital plan contains \$300,000 per year for I&I evaluation and repairs. It also contains \$100,000 per year for sewer main replacement. This will have to be voted on by City Council.

If you have any questions or need additional information, please contact my office at 413-772-1560 or by e-mail at Mayor@greenfield-ma.gov.

Sincerely,

Mayor William Martin

xc: Brian Harrington, DEP
MW, PR, MH, AT