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# Department of Environmental Protection

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Kathleen A. Theoharides Secretary

> Martin Suuberg Commissioner

#### Wastewater Collection System CMOM Program Self-Assessment Checklist

Name of your System: Shelburne Falls Wastewater Treatment Facility

Date of Self-Assessment: Dec 22, 2020

## Put an "A" in the final column for an issue you intend to address with future action, or leave blank if you have evaluated your program as sufficient. I. General Information – Collection System Description

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	Question	Response	*Act
1	How many people are served by your wastewater collection system?	Approximately 2,000. Because many of the units are located in the village area where there are many multi-family buildings creating regular population fluctuations. This number does include the Regional High School with a population of approximately 500 students and staff.	
2	What is the number of service connections to your collection system? How many: Manholes? Pump stations? Feet (or miles) of sewer? Force mains? Siphons?	Number of Service Connections: Manholes: 223 Pump Stations: 1 Feet of Sewer: 49,465 Force Mains: 1 Siphons: 0	
3	What is the age of your system (e.g., 30% over 30 years, 20% over 50 years, etc.)?	Fifty percent of system is 50 to 100 years old. Fifty percent of system is less than 50 years old.	
4	What type(s) of collection system map is/are available and what percent of the system is mapped by each method (e.g., paper only, paper scanned into electronic, digitized, interactive GIS, etc.)? When was the map(s) last updated?	Paper only: 100 percent Paper Scanned into Electronic: zero GIS: Initial GIS mapping of the collection system was developed as part of the Phase 1 I/I Study. Attributes including wall type, pipe type, and diameter have been integrated into GIS. Currently, there is no interactive GIS system in place. The proposed Phase 2A I/I Project includes additional GIS mapping updates.	
5	If you have a systematic numbering and identification method/system established to identify sewer system manhole, sewer lines, and other items (pump stations, etc.), please describe.	Sewer system sub-areas were established for the Phases 1 and 2 I/I Study, and manholes were assigned numbering (MH-1, etc.). Pipe types were assigned similar ID's based on upstream and downstream manholes (MH-1- MH-2, etc.).	
6	Are "as-built" plans (record drawings) or maps available and used by field crews in the office and in the field?	Yes	
7	Describe the type of asset management (AM) system you use (e.g. card catalog, spreadsheets, AM software program, etc.)	An asset management system was established as part of the Phase 2 I/I study, in excel format. The spreadsheet uses scoring criteria, based on the Phases 1 and 2 evaluation.	

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

II. Continuing Sewer Assessment Plan

II	Question	Response	*Act
1	Under what conditions, if any, does the collection system overflow? Does it overflow during wet and/or dry weather? Has your system had	The Wastewater Facility is able to receive greater than 1.44 MGD without overflow. We experienced flows greater than 1.44 MGD during Hurricane Irene however the system conveyed the flow without overflow of the collection system. We have had minor sewer overflows, ie Conway Street. We had the sewer line cleaned and the problem was diagnosed as severe root	
	problems with: □ hydraulic issues, □ debris, □ roots, □ Fats, Oils & Grease (FOG), □ vandalism	intrusion and was resolved. We have <u>not had hydraulic issues</u> , fat,s oils or grease, or vandalism.	
	blockages resulting in manhole overflows, □ basement backups, □ other (specify)? Describe your	We have had issues with minor debris, roots, basement backups (rare).	
	system's history of structural collapses, and PS or force main failures.	During Hurricane Irene approximately 75 feet of sewer main was exposed but did not breach. The Town replaced the sewer line the following year.	
2	How many SSOs have occurred in each of the last three calendar years? What is the most frequent cause?	Zero, we do not have a combined system.	
3	Of those SSOs, how many basement backups occurred in each of the last three calendar years? How are they documented?	N/A	
4	What is the ratio of peak wet-weather flow to average dry-weather flow at the wastewater treatment plant (or municipal boundary for satellite collection systems)?	Peak Wet-Weather was 0.339 (March 2019) Dry-Weather: Our 30-year daily average of dry weather (August) flow is 0.160 MGD Ratio: 2.12 : 1	
5	What short-term measures have been implemented or plan to be implemented to mitigate the overflows? If actions are planned, when will they be implemented?	N/A	
6	What long-term measures have been implemented or plan to be implemented to mitigate the overflows? If actions are planned, when will they be implemented?	N/A	
7	Describe your preventive maintenance program; how do you track it (e.g., card files, electronically, with specific software)?	Daily log of precipitation and flow. We have a number of CCTV inspections that we maintain, and we perform root control on an as needed basis.	
8	How do you prioritize investigations, repairs and rehabilitation? What critical and priority problem areas are addressed more frequently than the remainder of your system? How frequently are these areas evaluated?	We prioritize based on excess flow or root problems. We have three primary areas of concern for roots and we monitor them annually.	
9	Are septage haulers required to declare the origin of their "load"? Are records of these declarations maintained? Do any of the declarations provide evidence of SSOs?	Septage is not accepted.	

III.A	Question	Response	*Act
1	Do you have an organizational chart that shows the overall personnel structure for collection system operations, including operation and maintenance staff? Please attach your chart.	We have two operators, both required to know all facets of system operations. We also have one on-call operator with prior system experience and current licensing. We have one administrator that performs budgetary and other administrative tasks. We have two collectors that perform billing responsibilities. We have six Commissioners that set rates, policy and oversee all operations and fiduciary functions Chart Attached.	
2	For which jobs do you have up-to- date job descriptions that delineate responsibilities and authority for each position?	Chief Operator, Assistant Operator Town Administrator, Treasurer / Collector Sewer Commissioner's Assistant / Clerical	
3	How many staff members are dedicated to collection system maintenance? Of those, how many are responsible for any other duties, (e.g., road repair or maintenance, O&M of the storm water collection system)? If so, describe other duties.	Collection System Maintenance is part of the duties required by the Chief Operator and Assistant Operator.	
4	Are there any collection system maintenance position vacancies? How long has the position(s) been vacant?	No	
5	For which, if any, maintenance activities do you use an outside contractor?	Chemical root control, CCTV inspections.	
6	Describe any group purchase contracts you participate in.	N/A	

## III.B. Collection System Management: Training

III.B	Question	Response	*Act
1	What types of training are provided to staff?	The Town provides continuing education credits plus OJT	
2	Is training provided in the following areas: general safety, routine line maintenance, confined space entry, MSDS, lockout/tagout, biologic hazards, traffic control, record keeping, electrical and instrumentation, pipe repair, public relations, SSO/emergency response, pump station operations and maintenance, trench/shoring, other (describe)?	Yes	
3	Which training requirements are mandatory for key employees?	All	
4	How many collection system employees are certified (e.g. NEWEA certification program) and at what grade are they certified?	Both operators are certified Wastewater Operators, which includes collection operations. Neither are certified Collection System Operators.	

III.C	Question	Response	*Act
1	Describe your public education/outreach programs (e.g., for user rates, FOG, extraneous flow, SSOs etc.)	Class trips are provided to Elementary School students and any middle or high school classes that wish to see the facility. Sewer Commissioners meet regularly and set sewer rates annually during a posted public meeting.	
2	What are the most common collection system complaints? How many complaints have you received in each of the past three calendar years?	Complaints are extremely rare. There were zero complaints in this past calendar year.	
3	Are formal procedures in place to evaluate and respond to complaints?	Yes	
4	How are complaint records maintained (i.e., computerized)? How are complaints tied to emergency response and operations and maintenance programs?	Operators enter the incident and response into the daily log.	

#### III.D. Collection System Management: Management Information Systems

III.D	Question	Response	*Act
1	How do you manage collection system information? (Commercial software package, spreadsheets, data bases, SCADA, etc). What information and functions are managed electronically?	Microsoft Excel Spreadsheets.	
2	What procedures are used to track and plan collection system maintenance activities?	Regular maintenance is directed to known areas of concern and tracked annually or as incidents occur.	
3	Who is responsible for establishing maintenance priorities? What records are maintained for each piece of mechanical equipment within the collection system?	Sewer Commissioners upon recommendation of Chief Operator.	
4	What is the backlog for various types of work orders?	No backlog. No work order system necessary.	
5	How do you track emergencies and your response to emergencies? How do you link emergency responses to your maintenance activities?	Emergency responses are entered into the daily log and noted for the annual report.	

6	What written policies/protocols do you have for managing and tracking the following information: complaint work orders, scheduled work orders, customer service, scheduled preventative maintenance, scheduled inspections, sewer system	Our system is small enough that work orders and other tracking systems have not been required. The operators respond, resolve and document.	
	inventory, safety incidents, emergency responses, scheduled monitoring/sampling, compliance/overflow tracking, equipment/tools tracking, parts inventory?		

#### III.E. Collection System Management: SSO Notification Program

III.E	Question	Response	*Act
1	What are your procedures, including time frames, for notifying state agencies, health agencies, regulatory authorities, and the drinking water authorities of overflow events?	N/A	
2	Do you use the state standard form for recording/reporting overflow events? If not, provide a sample copy of the form that is used.	N/A	

#### III.F. Collection System Management: Legal Authority

III.F	Question	Response	*Act
1	Are discharges to the sewer regulated by a sewer use ordinance (SUO)? Does the SUO contain procedures for controlling and enforcing the following:  □ FOG;  □ Infiltration/ Inflow (I/I);  □ building structures over the sewer lines;  □ storm water connections to sanitary lines;  □ defects in service laterals located on private property;  □ sump pumps?	We have sewer bylaws in place that control FOG, I&I, building structures over sewer lines, storm water connections to sanitary lines, defects in service laterals located on private property and sump pumps.	
2	Who is responsible for enforcing various aspects of the SUO? Does this party communicate with your department on a regular basis?	Sewer Commissioners at the recommendation of the Chief Operator	
3	Summarize any SUO enforcement actions/activities that have occurred in the last three calendar years.	Zero	

4	Do you have a program to control FOG entering the collection system? If so, which of the following does it include: permits, inspection enforcement? Are commercial grease traps inspected regularly and who is responsible for conducting inspections?	We do not have a FOG control program. Any FOG is minor enough to not cause an operations issue.	
5	Is there an ordinance dealing with storm water connections or requirements to remove storm water connections?	Yes, in the Sewer Bylaws.	
6	Does the collection system receive flow from satellite communities? Which communities? How are flows from these satellite communities regulated? Are satellite flow capacity issues periodically reviewed?	The Shelburne Falls Wastewater Facility collects from Buckland and Shelburne. It also collects from the Regional High School.	
7	Does the collection system receive flow from private collection systems? If yes, how is flow from these private sources regulated? How are overflows dealt with? Provide details, including contact information for these private systems.	No	

## IV.A. Collection System Operation: Financing

IV.A	Question	Response	*Act
1	Has an enterprise (or other) fund been established and what does it include: wastewater collection and treatment operations; collection system maintenance; long-term infrastructure improvements; etc.? Are the funds sufficient to properly fund future system needs?	Yes, the treatment plants operational budget is funded through two enterprise accounts. One per Town with the majority of expenses shared by both Towns. Buckland certified \$251,413.00 in retained earnings as of July 1, 2020. Shelburne certified \$123,582 in retained earning as of July 1, 2020 Additionally, Shelburne and Buckland have allocated a combined \$155,000 in FY21 for sewer improvement. The majority of these funds will be used to complete sewer line and manhole replacement as part of a MassDOT TIP road reconstruction project.	
2	How are rates calculated (have you done a rate analysis)? What is the current sewer charge rate? When was it last increased? How much was the increase?	Per 100 gallons based on water usage. The current rate in Buckland is 0.746 per cubic foot. Buckland's minimum bill amount is \$253.64 and the average bill is \$440.75. The current rate in Shelburne is 0.064 per cubic foot. The rate charges are recalculated annually based on the proposed budget.	
3	What is your O&M budget?	The FY21 O&M Budget is \$278,901.	
4	If an enterprise fund has not been established, how are collection system maintenance operations funded?	N/A	
5	Does a Capital Improvement Plan (CIP) that provides for system repair/replacement on a prioritized basis exist? What is the collection system's average annual CIP budget?	In progress. In recent years Capital Improvements have been done in conjunction with other Town road reconstruction and repair projects. With a SESS in place the Towns will be able to provide greater input into the Towns' CIP process, influencing the prioritization of larger infrastructure projects.	A

the Government Accounting Standards Board standard 34 (GASB 34)?	6	How do you account for the value of your system infrastructure for the Government Accounting Standards Board standard 34 (GASB 34)?	Capital Assets are recorded at cost and depreciated over the asset's useful life.	
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## IV.B. Collection System Operation: Hydrogen Sulfide Monitoring and Control

IV.B	Question	Response	*Act
1	Are odors a frequent source of complaints? How many have been received in the last calendar year?	No. Zero complaints.	
2	Do you have a hydrogen sulfide problem, and if so, do you have corrosion control programs? What are the major elements of the program?	No, sewers have sufficient velocity and ventilation to prevent H2S from forming.	
3	Does your system contain air relief valves at the high points of the force main system? How often are they inspected? How often are they exercised?	No, the system's forced main is short.	

## IV.C. Collection System Operation: Safety

IV.C	Question	Response	*Act
1	Do you have a formal Safety Training Program? How do you maintain safety training records?	No.	
2	Which of the following equipment items are available and in adequate supply: rubber/disposable gloves; confined space ventilation equipment; hard hats, safety glasses, rubber boots; antibacterial soap and first aid kit; tripods or non-entry rescue equipment; fire extinguishers; equipment to enter manholes; portable crane/hoist; atmospheric testing equipment and gas detectors; oxygen sensors; H2S monitors; full body harness; protective clothing; traffic/public access control equipment; 5-minute escape breathing devices; life preservers for lagoons; safety buoy at activated sludge plants; fiberglass or wooden ladders for electrical work; respirators and/or self-contained breathing apparatus; methane gas or OVA analyzer; LEL metering?	The only item that we do not keep onsite in adequate supply is the "5-Minute escape breathing device." We will procuring two devices to have at the plant.	A

IV.D	Question	Response	*Act
1	Do you have a written collection system emergency response plan? When was the plan last updated? What departments are included in your emergency planning?	The Towns each have an Emergency Management Plan and the Wastewater Facility is included in those plans. All other departments are included in the emergency planning including Highway, Police, Fire and other non- emergency personnel.	
2	Which of the following issues are considered:  vulnerable points in the system,  severe natural events (see also Section VII, below), failure of critical system components, vandalism or other third party events (specify), other types of incidents (specify)?	All of the issues listed were considered except for vandalism and other third- party events. This could be considered when the plans are updated next.	A
3	How do you train staff to respond to emergency situations? Where are responsibilities detailed for personnel who respond to emergencies?	At this time, with a two-person department the training is done on a one-to- one basis. A formal training manual does not exist but should be created in the future	A
4	How many emergency calls have you had in the past calendar year?	One. It was a private connection to the sewer that was disrupted during road reconstruction.	

## **IV.E.** Collection System Operation: Engineering – Capacity

IV.E	Question	Response	*Act
1	How do you evaluate the capacity of your system and what capacity issues have you identified, if any? What is your plan to remedy the identified capacity issues?	The capacity of the collection system is more than six times the capacity of the treatment facility capacity. The collection system is not a limiting factor.	
2	What procedures do you use to determine whether the capacity of existing gravity sewer system, pump stations and force mains are adequate for new connections? Who does this evaluation?	The Village has very limited potential for growth. The trend for the last 30 years has been a steady decline in flow. An industrial user that contributed a substantial amount of flow has moved out of the area.	
3	Do you charge hookup fees for new development and if so, how are they calculated?	The system charges \$75 for residential and \$150 for commercial hook ups.	
4	Do you have a hydraulic model of your collection system? Is it used to predict the effects of system remediation and new connections?	No.	

## IV.F. Collection System Operation: Pump Stations - Inspection

IV.F	Question	Response	*Act
1	How many pump stations are in the system? How often are pump stations inspected? How many are privately owned, and how are they inspected? Do you use an inspection checklist?	One town-owned pump station that is inspected daily. There are less than 10 privately owned pump stations and they are the owners' responsibility for inspection.	
2	Is there sufficient redundancy of equipment at all pump stations?	Yes.	

3	How are pump stations monitored? If a SCADA system is used, what parameters are monitored?	There is an auto dialer for emergency conditions.	
4	How many pump station/force main failures have you had in each of the last three years? Who responds to pump station/force main failures and overflows? How are the responders notified?	We have experienced one pump station failure in last three years.	
5	How many pump stations are equipped with backup power sources? How many require portable generators? How many portable generators does your system own? Explain how the portable generators will be deployed during a system-wide electrical outage.	The sole town-owned pump station and the public school have back up power. It is unknown whether the other privately owned pump stations have back up power.	
6	Are operation logs maintained for all pump stations? Are the lead, lag, and backup pumps rotated regularly?	Yes, daily operation logs are maintained, and the back-up pumps are rotated regularly	
7	Is there a procedure to modify pump operations (manually, or automatically), during wet weather to increase in-line storage of wet weather flows? If so, describe.	No.	

#### V.A. Equipment and Collection System Maintenance: Sewer Cleaning

V.A	Question	Response	*Act
1	What is your schedule for cleaning sewer lines on a system-wide basis? At this frequency, how long will it take to clean the system? How are sewer cleaning efforts documented?	We don't typically do a system wide cleaning but we flush lines as required in the spring and fall. We jet pipes as needed. These actions are documented in the daily log.	
2	How many linear miles of the collection system were cleaned in each of the past 3 calendar years?	Approximately four miles of pipe are cleaned per year.	
3	How do you identify sewer line segments that have chronic problems and should be cleaned more frequently? Is a list of these areas maintained and cleaning frequencies established?	There are three short sections, less than 2,000 linear feet, that require repeated cleanings. Overall our system does not have chronic problems.	
4	Approximately, how many collection system blockages have occurred during the last calendar year, and what were the causes?	None	
5	Has the number of blockages increased, decreased, or stayed the same over the past five years?	Decreased.	

6	What equipment is available to clean sewers? Is any type of cleaning contracted to other parties? If yes, under what circumstances?	We own a trailer mounted jetter for routine cleaning and opening minor obstructions. For major obstructions we use contracted services. The last time we had a major obstruction requiring contracted services was nine years ago.	
7	Do you have a root control program? Describe its critical components.	We contract root control services as necessary.	
8	Is your current CMOM plan written? If so, how does it compare with NEIWPCC Guidance?	This is our first CMOM plan.	A

#### V.B. Equipment and Collection System Maintenance: Maintenance Right-of-Way

V.B	Question	Response	*Act
1	Is scheduled maintenance performed on Rights-of-Way and Easements? At what frequency? How many manholes in easement areas cannot be located?	We do not perform maintenance on rights of way. There is one manhole that has been covered with grass in a low-priority area.	
2	Are road paving projects coordinated with the collection system operators? Have manholes been paved over? How many manholes in paved areas cannot be located? Describe any systems in place for locating and raising manholes that have been paved over.	Yes. The operators are included at design level of all projects and work closely with project engineers. As often as possible improvements are targeted during road reconstruction projects and manholes are replaced, not covered. There is one manhole that was patched over by the highway department during routine maintenance. It has since been located and uncovered.	

## V.C. Equipment and Collection System Maintenance: Parts Inventory

V.C	Question	Response	*Act
1	Do you have a central location for the storage of spare parts?	Yes	
2	How have critical spare parts been identified?	The operators tag each spare part so they are easily identified.	
3	How to you determine if adequate supplies on hand? Has an inventory tracking system been implemented?	We do not have an inventory tracking system. When an item is used it is replaced immediately.	

## VI.A. SSES: System Assessment

VI.A	Question	Response	*Act
1	Do POTW flow records or prior I/I or SSES programs indicate the presence of public/private inflow sources or sump pumps? Please Explain.	Yes. The POTW is aware of a small number (less than five) private inflow sources and is working with property owners to remediate.	А
2	If problems are related to I/I, has a Sewer System Evaluation Survey (SSES) been conducted? When? What is the status of the recommendations?	In progress.	А

3	Do you have a program to identify and eliminate sources of I/I into the system including private service laterals and illegal connections? If so, describe.	In progress.	A
4	Have private residences been inspected for sump pumps and roof leader connections?	We have done some inspections but we have not done a system wide survey.	
5	Are inspections to identify illicit connections conducted during the property transfer process?	We have not explored this opportunity but will consider adding it to our procedures / bylaws.	А
6	How many sump pumps and roof leaders have been identified? How many have been removed?	Approximately 75 percent were removed when the collection system was separated in 1974. We estimate that we have eliminated the remaining 25 percent in the past 30 years.	
7	Have follow-up homeowner inspections been conducted?	Yes.	
8	What incentive programs exist to encourage residences to disconnect roof leaders & sump pumps? (i.e. matching funds, etc.)	The Towns do not offer any financial assistance.	
9	What disincentive programs exist to encourage residences to disconnect roof leaders & sump pumps? (i.e. fines, surcharges)	The bylaws have a provision for fines but the need for enforcement is rare.	

## VI.B. SSES: Manhole Inspection

VI.B	Question	Response	*Act
1	Do you have a manhole inspection and assessment program?	An inspection of all manholes was completed in 2019 during Phase 1 of our I/I Study. Plans for regular inspection are in progress.	A
2	Has a formal manhole inspection checklist been developed?	Yes.	
3	How many manholes were inspected during the past calendar year?	All 223 manholes were inspected in 2018 and 2019.	

### VII. Flood Resilience

VII	Question	Response	*Act
1	Have you prepared plans and procedures for responding to extreme weather events that may result in flooding and loss of power? Have you reviewed the	Yes. The Town of Buckland has updated its Hazard Mitigation and Disaster Plan in 2020. It is currently under FEMA review.	
	report "Preparing for Extreme Weather at Wastewater Utilities: Strategies and Tips," published by the New England Interstate Water Pollution Control Commission (NEIWPCC) in September 2016?		

2	Do you have sewer lines that are within a flood area displayed in the Flood Insurance Rate Maps (FIRMs) published by the Federal Emergency Management Agency (FEMA)? What types of flood areas? Do the manholes on these sewer lines have water-tight manhole covers?	Yes. We do not have water tight manhole covers at this time, however the Town is preparing for a complete road reconstruction project on Conway Street, one of the primary target areas for flooding. Replacing existing manhole covers with water-tight covers will be recommended to MassDOT for inclusion in the project design.	A
3	Are any of your pump stations located within FEMA FIRM flood areas? What types of flood areas? Have you implemented any structural measures to provide flood resilience?	Based on FEMA FIRM Map 250127 0005 B, it appears that portions of the pump station located on Deerfield Avenue in Shelburne may be located within the 100-year flood zone, however, the Deerfield River has never encroached the pumpstation, including during Hurricane Irene.	
4	Are upgrades or expansions being considered for any pump stations located within FEMA FIRM flood areas? Have you considered flood risk mitigation measures such as those listed in Section 1.2.1.h of the 2016 revision of Technical Report #16 Guides for the Design of Wastewater Treatment Works (TR-16) published by NEIWPCC in your designs?	No	
5	Are any of your treatment plant facilities located within FEMA FIRM flood areas? What types of flood areas? Have you implemented any structural measures to provide flood resilience?	Based on FEMA Firm Map 250111 0010 B, the Shelburne Falls WWTP is not located in a flood zone. The Deerfield River has never encroached the treatment plan located on Gardner Falls Road in Buckland, including during Hurricane Irene.	
6	Are upgrades or expansions being considered for any treatment plant facilities located within FEMA FIRM flood areas? Have you considered flood risk mitigation measures such as those listed in Section 1.2.1.h of TR-16 in your designs?	No	

#### VIII. Energy Use

VIII	Question	Response	*Act
1	What is your annual energy cost for operating your system? For which pieces of equipment do you track energy use?	The annual electrical cost for the pump station is Shelburne is \$4,000 The annual electrical cost for the Treatment Facility in Buckland is \$28,816 (calendar year 2020, including averages for Nov & Dec billing)	
2	Have you upgraded any of your pumps and motors to more energy efficient models? If so, please describe.	Yes. At the pump station we have updated the motors. At the treatment plant all major motors are speed controlled with variable frequency drives to match equipment needs.	
3	Have you performed an energy audit in the past three years?	Yes. The University of Massachusetts Clean Energy Extension completed an Energy Audit and Assessment in 2020.	

4	Where do you use the most	The pump station is the primary user of electricity for the collections system.	
	energy (fuel, electricity) in		
	operating your collection system?		

#### IX. Other Actions

IX	Question	Response	*Act
1	Describe any other actions that you plan to take to improve your CMOM Program that are not discussed above.	Further evaluation and rehabilitation of the collection system is planned, including sonar testing, smoke testing, and rehabilitation of manholes and pipes. The evaluation will be completed in 2021, and the asset management database will be updated accordingly. Based on the results of the evaluation, rehabilitation will be prioritized based on the asset management database and available capital, and implemented beginning in 2022, subject to authorization by Buckland and Shelburne.	A