



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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February 5, 2021

Town of Buckland
Board of Selectman
17 State Street
Buckland, MA 01338

RE: Shelburne Falls-WWM
WWTP and Sewer System Staffing
Project #268-001/76, #047-076
Compliance - Staffing

Dear Board Members:

On August 28, 2020, a representative from the Massachusetts Department of Environmental Protection (MassDEP or Department) conducted an inspection of the Shelburne Falls Wastewater Treatment Plant (WWTP). The resulting inspection report documented the findings of the inspection and represents a conditional approval for infiltration and inflow (I/I) for both the Shelburne and Buckland Sewer Systems under 314 CMR 12.00.

During the inspection MassDEP reviewed the current Operation and Maintenance (O&M) Manual for the WWTP. Currently, staff at the WWTP is responsible for the day-to-day operations at the WWTP, pumping station inspections, reed bed (sludge) operations, and the maintenance of the sewer collection system.

During the inspection, MassDEP observed that Shelburne Falls had only two individuals with the necessary licenses to meet its WWTP and Collection System requirements. A third licensed operator is on call and available, as necessary. The above noted fulltime individuals both are understood to staff the WWTP Monday through Friday from 7:00 a.m. until 3:30 p.m. for a total of 7.5 hours per day and one staff for 2 hours per day on weekends and holidays. At the time of the inspection, the town did not appear to have sufficient personnel to meet the additional Capacity, Management, Operation, and Maintenance (CMOM) requirements of Sanitary Sewer Collection System.

This information is available in alternate format. Contact Michelle Waters-Ekanem, Director of Diversity/Civil Rights at 617-292-5751.

TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

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During MassDEP's 2010 inspection a staffing calculation for Shelburne Buckland was completed for the WWTP operations. The staffing calculation was completed by MassDEP using MassDEP guidance and the tally sheets from the New England Interstate Water Pollution Control Commission (NEIWPCC). A summary of the calculation indicated that the minimal staffing for the Shelburne/Buckland WWTP equated to a total of 2.2 staff based on a total estimated operation and maintenance hours of 3,308 hrs./year. Any fractional number is rounded upward to the next higher number; in this case 3.

MassDEP provided a copy of the NEIWPCC tally sheets to Shelburne's Chief Operator on or about September 1, 2020. As Table 7 in the NEIWPCC tally sheets do not provide for a number for hours spent on inspecting pump stations or amount of time for sewer system maintenance, it is MassDEP's conclusion that the required staffing for the Shelburne Buckland WWTP and sewer system is higher than 2.2 due to this task not being in the calculation. As Shelburne and Buckland are likely aware, in addition to the requirements in 314 CMR 12.00, Part I.C.1 of the Shelburne/Buckland NPDES Permit requires maintenance of proper staffing for the sewer system per 40 CFR 122.

During MassDEP's 2020 inspection, MassDEP discussed the O&M and material disposal from the reed bed harvest. Currently the material is trucked off site and landfilled at significant expense to the towns. Given the stabilization process and process for pathogen reduction (freeze thaw), it is recommended that Shelburne and Buckland assess obtaining a Type 1 or 2 Biosolid under MassDEP regulations at 310 CMR 32.00 for the material.

Within thirty (30) days from the date of this letter, please submit to MassDEP a formal staffing assessment utilizing the *New England Interstate Water Pollution Control Commission (NEIWPCC) entitled: "The Northeast Guide for Estimating Staffing at Publicly and Privately Owned Wastewater Treatment Plants"* for the WWTP, sewer system and the solids handling (reed beds); include any staffing requirements that will be required if Shelburne intends to obtain a Type 1 or Type 2 Biosolids Permit under MassDEP regulations at 310 CMR 32.00 for disposal of the reed bed material. The formal staffing assessment can be completed "in house" by WWTP staff without the need to retain a consultant. MassDEP recommends that a minimum of 2 staff be provided to conduct collection system work at the same time. Additionally, the staffing assessment should include appropriate time for those items listed as actionable in the CMOM checklist and the ongoing preventive maintenance requirements of the collection system. Please include specific measurable activities and responsibilities related to the Treatment Works of each Town for administrative time allotted to all enterprise related time for billing, meter reading, report preparation, and other similar activities.

MassDEP will review the submitted staffing assessment to evaluate the anticipated staffing needs of Shelburne Falls. Additional staff may not need WWTP operator certification unless the work expected to be undertaken would include maintenance activities that would require WWTP certification.

Additionally, given the limited capacity of the WWTP and observed permit excursions during the wetter periods of the year, MassDEP required that Shelburne and Buckland provide a construction schedule to implement the recommendations of the DPC consultant's report by not later than March 31, 2021. Shelburne and Buckland shall include staffing time related to these recommendations in the assessment.

MassDEP anticipates the minimum staffing requirement for the Shelburne Falls WWTP and Sewer System at 3 full time staff. This would include 2 for the WWTP and 1 for the Collection System. In making this staffing level determination, MassDEP utilized the guidance manual from New England Interstate Water Pollution Control Commission (NEIWPC) entitled: "The Northeast Guide for Estimating Staffing at Publicly and Privately Owned Wastewater Treatment Plants".

MassDEP may consider a reduction in the staffing level of 3 based upon the operation of the WWTP, the Town's ability to address deferred maintenance, especially in its Sewer System and to maintain compliance with its NPDES permit, and MassDEP regulations.

Any staffing level approval will be remain contingent on Shelburne Falls maintaining compliance with the Shelburne Falls NPDES Permit and MassDEP Regulations.

Should you have any questions regarding this issue, please contact the undersigned at (413) 755-2218 or Dan Kurpaska at (413) 755-2274.

Sincerely,

This final document copy is being provided to you electronically by the Department of Environmental Protection. A signed copy of this document is on file at the DEP office listed on the letterhead.

Matthew J. Sokop, P.E.
Wastewater Section Chief
Bureau of Water Resources

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Enclosure: Inspection Report, CMOM Checklist, NEIWPC Staffing Estimate

cc: WERO: File (3)

ecc: WERO: Electronic file,
Dan Fleuriel (sfwwtf@town.buckland.ma.us),
Town of Shelburne Board of Selectmen (townadmin@townofshelburnema.gov)
Heather Butler, Town Administrator of Buckland