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COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION
ONE WINTER STREET, BOSTON, MA 02108 617-292-5500

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Governor

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ELLEN ROY HERZFELDER
Secretary

ROBERT W. BOLLEDGE, Jr.
Commissioner

March 8, 2004

Pio Lombardo
Lombardo Associates, Inc.
49 Edge Hill Road
Newton, MA 02467

RE: Little Neck

Dear Mr. Lombardo:

This letter is written in response to your letter dated March 1, 2004 regarding a Scope of Work to evaluate wastewater alternatives at Little Neck in Ipswich. As you are aware the Department and The Feoffees of the Grammar School entered into Administrative Consent Order (ACO) in September 2000 requiring the facility ("Little Neck") to come into compliance with the Clean Waters Act and 314 CMR 5.00. The Feoffees compliance plan consisted of the installation of tight tanks and drip irrigation systems. The ACO required this work to be completed by November 30, 2002. Due to the potential to bring municipal sewage to Little Neck the Department deferred this work until the Town of Ipswich decided the feasibility of this plan. The Town has since decided not to pursue extending municipal sewage to Little Neck. Therefore, at this time it is the Department's position that the Feoffees must complete the work identified in their compliance plan as approved by the Department by December 31, 2005. The current schedule calls for the tight tanks to be installed on a staggered basis in 2004 and 2005.

On January 15, 2004 the Department met with the Feoffees and you to discuss three (3) alternative wastewater disposal options identified in your letter dated January 6, 2004. As a result of that meeting you submitted a Scope of Work to the Department dated March 1, 2004. The scope intends to evaluate a central collection and treatment facility that would discharge the wastewater to a series of drip irrigation systems on Little Neck and off if necessary and reuse the wastewater for toilet flushing and possible laundry. Within six (6) months of commencing work an Implementation Plan would be submitted to the Department that would outline the feasibility of implanting such a plan, the permitting process, design and construction costs, and activities associated with implementing the plan. The Department offers the following comments which must be addressed in the plan:

EXHIBIT

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1. The Department's reuse policy does not allow for the reuse (toilet & laundry) of wastewater within residential homes.
2. The treated effluent proposed for drip irrigation must meet the standards for spray irrigation identified in Appendix A of the Department's "Interim Guidelines on Reclaimed Water (Revised) - January 3, 2000".
3. A contingency plan must be provided that would be implemented in situations where there were problems with either the treatment system or drip irrigation system. Said plan could include, but not be limited to, an alternative, permitted disposal option and/or wastewater storage.
4. A management plan must be developed that would identify the responsibilities of all the parties associated with operation and management the proposed system. This plan must include funding mechanisms to build it and the long-term operation & maintenance.
5. Since a wastewater treatment facility will be required under this plan and this is a seasonal community the implementation plan must identify steps to insure compliance with the effluent limits when the community moves back before the summer months. The facility will be required to meet all its applicable effluent limits at all times during the year.
6. The Plan must provide a schedule that will allow the installation and completion of construction by December 31, 2004.

If you have any question regarding this matter, please contact David Ferris at (617) 654-6514.

Very truly yours,



Madelyn Morris
Deputy Regional Director
Bureau of Resource Protection

CC: Donald Whiston, Feoffees of the Grammar School, 2 Jeffrey's Neck Road, Ipswich,
Richard A. Nylén, Jr., Lynch, DeSimone and Nylén, LLP, 12 Post Office Square,
Boston, 02109