



Massachusetts Water Resources Authority

MWRA Advisory Board

**Impacts of Co-permittee Requirements
to Communities**

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June 20, 2013



NPDES Permits

- National Pollutant Discharge Elimination System (NPDES) permit is issued to a discharger – the Wastewater Treatment Facility (WWTF)
- Gives license to discharge limited pollutants to the waters of the US under certain conditions



NPDES Permits

- Previously issued by EPA/DEP solely to MWRA for Deer Island/CSOs and MWRA–owned collection system
- Community–owned collection systems were not included in Deer Island NPDES permit.
- Co-permittees will be included in next Deer Island permit
- Current and new draft Clinton NPDES permit DOES include communities as Co-permittees



What are co-permittees

- In some systems, several municipal collection systems are tributary to one WWTF
- For such systems, EPA has been designating the municipalities as “co-permittees” in the WWTF’s NPDES permit
- Permit requirements for operation and maintenance and unauthorized discharges (SS0)s where the collection systems are not owned by the discharger (permittee)



23 permits in Mass. include Co-permittees

Example: from Charles River Pollution Control District

- “The Towns of Franklin, Medway, Millis, and Bellingham are co-permittees for specific activities required in Sections I.B - Unauthorized Discharges (SSOs), and
- I.C - Operation and Maintenance of the Sewer System, which include conditions regarding the operation and maintenance of the collection systems. The responsible municipal Departments are [towns listed]”



Section 1C- Operation and Maintenance Requirements from CRPCD draft permit

Permittee and Co-permittees requirements related to

1. Maintenance Staff
2. Preventive Maintenance Program
3. Infiltration and Inflow
4. Collection System Mapping
5. Collection System Operation and Maintenance Plan
6. Annual Reporting Requirements
7. Alternate Power Source



What does having this in an NPDES permit mean

- Gives EPA a more direct mechanism to regulate/enforce O&M in communities
- Without the permit requirements EPA only has authority to enforce against SSOs that discharge to waters of US



What does having this in an NPDES permit mean

- **Community SSO reporting requirements**
- **Preparation of Collection System O&M Plans
(6 - 30 months)**
- **I/I plans – focus on sump pumps down
spouts, etc.**
- **Collection System Mapping (30 Months)**
- **Alternative Power Source**