



Stantec Consulting Services Inc.
65 Network Drive, 2nd Floor, Burlington MA 01803-2767

July 31, 2020

Attention: Todd Borci, Enforcement Officer

US EPA Region I – New England
5 Post Office Square – Suite 100
Boston, MA 02109-3912

Subject: Town of Belmont
ORDER ON CONSENT Docket No. CWA-AO-R01-FY17-11
Report On Compliance

Dear Mr. Borci,

In accordance with the above referenced Order On Consent, we are submitting the following Report On Compliance (ROC) dated July 31, 2020, which describes activities conducted from January 1, 2020 through June 30, 2020 associated with the Wellington Brook and Winn's Brook tributary areas in the Town of Belmont. These two areas are designated as sub-catchments 8 and 10, respectively. This report also includes activities associated with sub-catchments 2, 9A, 11, 11A, 12, 15 & 15A. Refer to the November 2017 Investigation of the Winn's Brook and Wellington Brook Tributary Areas report and the January 2018 Report On Compliance for complete figures of each sub-catchment area. A comprehensive Sewer System Rehabilitation construction project (Attachment 1), which includes removal of suspected and confirmed illicit sources of contamination and inflow and infiltration, has been awarded and is currently under construction. The project includes all identified work from the previous ROC dated January 31, 2020.

V.1.a ILLICIT DISCHARGES IDENTIFIED

Sub-catchment 8-1

Completed

General follow up sampling was conducted throughout the sub-catchment and following previous rehabilitation in several locations. Figure 1 and Table 3 show the results of the sampling throughout the area. The sampling results indicate (sample locations 8-1-3, 8-1-4 and 8-1-5) that there are still elevated levels of *E. coli* in the Bow Road, Randolph Street and Lincoln Street Area indicating an additional source has since emerged.

Planned

Areas of investigations in the Bow Road, Randolph Street and Lincoln Street Area will be developed and targeted that include CCTV inspections, dyed water testing and additional sampling if necessary.



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Sub-catchment 8-2

Completed

No investigation work was conducted in this area during this time.

Planned

This sub-catchment area has been cleared as a source of contamination and will be sampled during the next reporting period for monitoring levels of *E. coli*.

Sub-catchment 8-5

Completed

Rehabilitation conducted in locations where contamination was identified has resulted in significant reduction of *E. coli* levels. Figure 2 and Table 4 show the results of the sampling throughout the targeted areas.

Planned

Outfall/Tributary sampling in sub-catchment 8-5 will be continued.

Sub-catchment 8-6

Completed

Maple St, Bartlett Ave and Trapelo Rd

All recommended rehabilitation work, identified in the last ROC, was designed and incorporated into a Sewer System Rehabilitation project to be completed by September.

Planned

Outfall and tributary sampling will be conducted upon completion of the work in the Sewer System Rehabilitation project.

Sub-catchment 10-2

Completed

All indirect and direct sources, identified in the last ROC, have been designed for removal by CIPP lining and replacement/relocation. The improvements have been and incorporated into a Sewer System Rehabilitation project to be completed by September.

Planned

Outfall and tributary sampling will be conducted upon completion of the service rehabilitation work in Sub-catchment Area 10-2.



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Sub-catchment 2

Completed

All services on Shaw Rd, Livermore Rd and Betts Rd, as described in the last reporting period Compliance Report, along with all identified indirect sources were designed for CIPP lining and incorporated in a Sewer System Rehabilitation project that has been awarded and is currently under construction.

Additional CCTV inspections were conducted for the storm drains on Dalton Road, Woods Road and Bacon Road to identify any defects indicating a potential contamination source. See Attachment 2 for field maps and locations. The *E. coli* sampling results were not significantly high but were still above the allowable level of 235 MPN/100mL. The sewer mainlines in these locations have been CIPP lined. Table 1 - Summary of Findings and Recommendations shows the CCTV inspection evaluations and proposed rehabilitation recommendations.

The sewer elevation is at or above the storm drain in these areas. Although the sewer mainlines are CIPP lined, possible sources of contamination may be emanating from the sewer laterals and migrating.

The drain inspection on Woods Road and the drain and sewer inspections on Anis Road are incomplete. These are scheduled to be completed in July 2020. Refer to Table 2 for the incomplete CCTV inspections.

Planned

Outfall and tributary sampling will be conducted upon completion of the service rehabilitation work in Sub-catchment Area 2. Proposed CCTV inspections will be completed in the area.

Outfall 9A

Completed

All mainline sewers on Hill Rd, identified in the last ROC, were designed for improvements by CIPP lining and included in the Sewer System Rehabilitation project to be completed by September.

Planned

Outfall and tributary sampling will be conducted upon completion of the work in the Sewer System Rehabilitation project.



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Outfalls 11, 11A & 12

Completed

All sewer services in Oliver Rd will be CIPP lined or replaced, as noted in the last ROC, and have been designed and included in the Sewer System Rehabilitation project to be completed by September.

Planned

Outfall and tributary sampling will be conducted upon completion of the service rehabilitation work.

Spy Pond Outfalls – Outfall Areas 15 & 15A

Outfall Area 15

Completed

No investigation work was conducted in this area during this time period.

Planned

This Outfall area has been cleared as a source of contamination and will be sampled during the next reporting period for monitoring levels of E. coli.

Outfall Area 15A

Completed

No investigation work was conducted in this area during this period.

Planned

Outfall and tributary sampling will be conducted upon completion of the service rehabilitation work in Outfall Areas 15A

V.1.b SSO EVENTS

See attached Table 5, which displays a list of blockages reported to the Town and removed.

V.1.c ILLICIT DISCHARGE AND SSO EVENT MAP

The Illicit Discharge and SSO Event Maps have been updated through June 2020 and are included in this Report (Figures 3 & 4).



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V.1.d CMOM-PROGRAM SELF-ASSESSMENT & CORRECTIVE ACTION PLAN ACTIVITIES

Activities undertaken this period include:

Section II. Continuing Sewer Assessment Plan: Item 9 - The Town is required to identify the origin of each load to be disposed of at the DPW Yard. As of November 2018, the Town is no longer allowing septage haulers to access the Town yard.

Section III. B. Collection System Management: Training, and Section IV. C. Collection System Operation: Safety - The Department of Public Works provides operations and equipment training to department staff. DPW is actively working to identify outside facilities and instructors in order to implement a safety training program.

Section III. E. Collection System Management: SSO Notification Program, Items 1 and 2 - The Department of Public Works is in receipt of the Massachusetts Department of Environmental Protection Sanitary Sewer Overflow (SSO)/Bypass Notification Form and the department is prepared to meet all reporting requirements when required to do so.

Section IV. D. Collection System Management: SSO Notification Program, Item 3 - The Department of Public Works provides to all sewer department staff an emergency response plan for SSO events. Regular staff training sessions are being programmed to ensure that new hires and current staff are prepared to respond to an SSO event.

V.1.e ADDITIONAL ACTIVITIES FOR ACHIEVING COMPLIANCE

Refer to the Part V.1.a.

V.1.f PROPOSED CHANGES TO REMEDIAL MEASURES

None.

V.1.g IDENTIFICATION OF ALL PLANS, REPORTS, AND OTHER SUBMISSIONS REQUIRED

No additional reports required for submission.

V.1.h PLANS FOLLOWING THE REPORTING DEADLINES

Refer to the Part V.1.a.

V.1.i IDENTIFICATION OF NONCOMPLIANCE OF THE ORDER

None.



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Below is a summary of rehabilitation work completed to date:

Completed this reporting period

None.

Previously completed

- 12 Brettwood Road – Indirect sewer service connection - Lined
- Homer Rd Sewer 17S021-17S020 – Indirect connection, broken pipe - Replaced/Lined
- 11 Pierce Road – Indirect sewer service connection - Lined
- 37 Hoitt Road – Indirect sewer service connection - Lined
- 43 Hoitt Road – Potential indirect sewer service connection - Lined
- 49 Hoitt Road – Potential indirect sewer service connection - Lined
- 16 Randolph St – Indirect sewer service connection – Lined
- 28 Randolph St – Indirect sewer service connection – Lined
- 71 Bow Rd – Direct sewer service connection to drain – Redirected to the sewer
- 364 Brighton St – Direct sewer service connection to drain – Redirected to the sewer

Please contact me if you have any questions regarding the information contained in this report.

Regards,

STANTEC CONSULTING SERVICES INC.

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