

what will be done if a problem occurs?

The Contingency Plan describes how, if monitoring results indicate a possible environmental problem, MWRA and the regulatory agencies will act to determine the cause of the problem and what corrective actions should be taken.

The Outfall Contingency Plan

The Outfall Contingency Plan was developed to create a process to identify and respond to water quality changes that potentially could be related to effluent discharges. Even though it is not expected that these discharges will affect the environment adversely, the Contingency Plan describes the criteria and process that MWRA, regulatory agencies, and the Outfall Monitoring Task Force (OMTF) would use to assess potential changes, make information on those changes available to the public, and respond appropriately to avoid harm to the marine environment.

How the Contingency Plan works

The Contingency Plan identifies trigger parameters, conditions that can suggest that effluent quality or environmental conditions may be changing or likely to change in the future. To alert MWRA to different degrees of observed change, each trigger parameter has thresholds that are defined as caution or warning levels. These thresholds are based on monitoring data collected since 1992.

In the event that a threshold is exceeded, the process for responding will vary somewhat depending on whether the threshold is a caution or a

more serious warning level (Figure 28). The response to any threshold exceedance, even before the cause has been discovered, will be to decide whether treatment plant operations can be altered to reduce the discharge of the relevant pollutant.

If MWRA discharges have caused a caution level to be exceeded, MWRA will expand its monitoring to closely track any change in effluent quality and environmental conditions, and provide the information necessary to:

- 1) evaluate the cause and effect of the exceedance; and
- 2) review applicable trigger parameters and thresholds.

If the threshold exceeded is a warning level, the proposed response will include both early notification to EPA and DEP and the quick development of a Response Plan. A Response Plan includes a schedule for implementing actions such as additional monitoring, making further adjustments in plant operations, or undertaking an Engineering Feasibility Study regarding specific potential corrective activities.

Corrective activities

Corrective activities have been identified in the Contingency Plan (or may be identified in the future) as potential solutions to unexpected impacts in the

marine ecosystem from the operation of the outfall. If the effects of effluent discharges must be reduced, examples of corrective activities could include the addition of specific enhanced treatment technologies and increased pollutant prevention and regulation.

How the Contingency Plan is accountable to the public

To ensure that the Contingency Plan provides appropriate environmental protection, every step of the implementation process will be open to public input and review. In addition, MWRA will produce a quarterly Wastewater Performance Report to provide the public with information about plant performance and monitoring results. The report is designed to:

- provide information about key wastewater operations;
- demonstrate day-to-day progress in achieving goals and objectives; and
- compare actual performance against trigger parameters and other important water quality monitoring or plant performance targets.

Once a year, MWRA will also develop an Outfall Monitoring Overview/Contingency Plan report that will be submitted to the Outfall Monitoring Task Force as well as to EPA, DEP, and the Federal

Court. The report will also be available to the public. The report will summarize monitoring results and any exceedances, responses related to the Contingency Plan, and corrective activities that have occurred over the previous year. The report will also propose changes to the Contingency Plan, as needed. Changes are expected to be guided primarily by OMTF recommendations.

How the Contingency Plan will be enforced

The Contingency Plan is one portion of many obligations, both state and federal, that MWRA is required to meet:

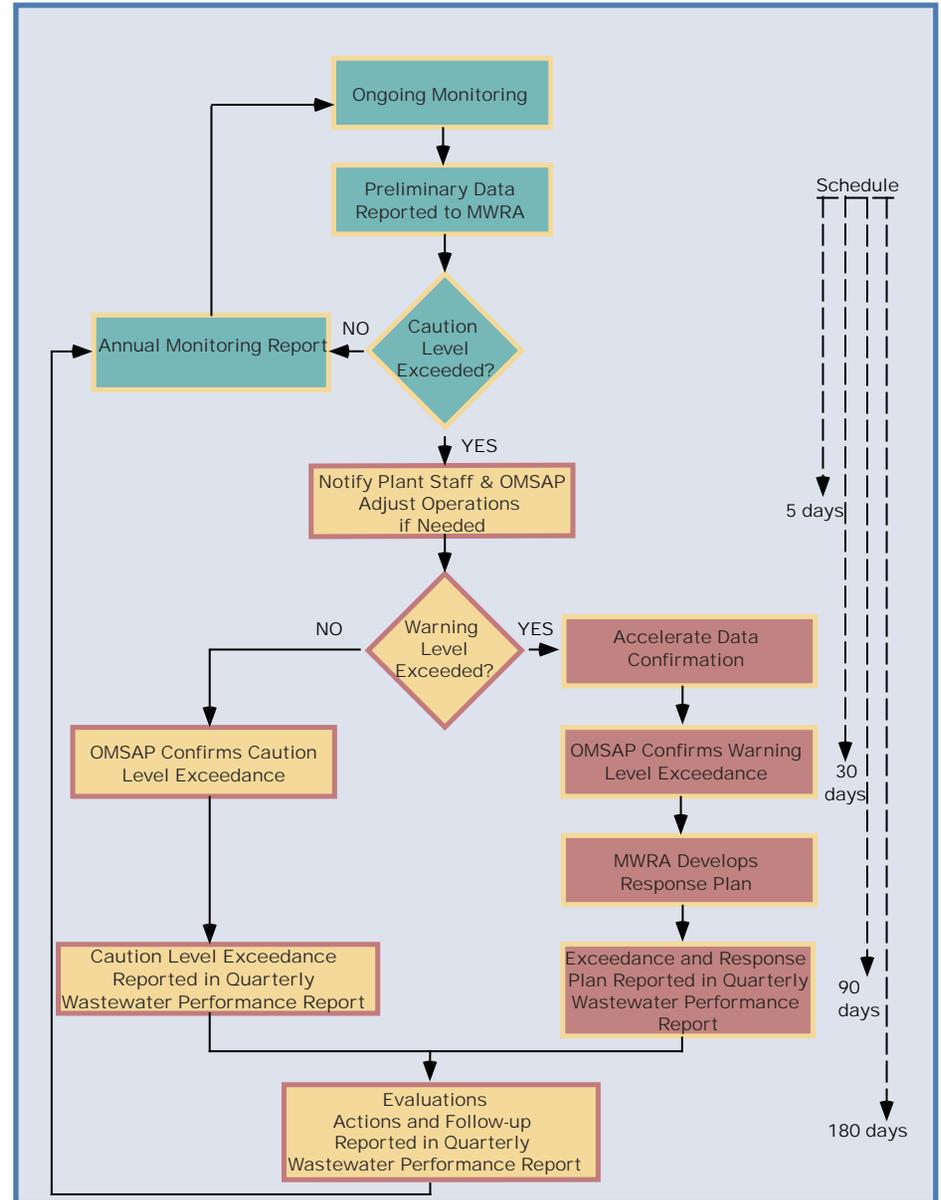
- The NPDES permit imposes extensive requirements on MWRA discharges, including effluent monitoring, reporting, plant maintenance and operations, and the industrial pretreatment program. Requirements for the combined sewer overflow (CSO) program and sludge-to-fertilizer plant are also included;
- A Federal Court Order guides the construction of the new treatment facilities, sludge-to fertilizer plant, CSO projects, and the industrial pretreatment program, as well as treatment plant staffing;
- The Massachusetts Executive Office of Environmental Affairs and EPA have overseen the development and implementation of MWRA's Outfall

Monitoring Plan, which has also been submitted to the Federal Court.

To ensure that even greater oversight and enforcement opportunities are provided, the new draft NPDES permit being developed for public comment by EPA and DEP is expected to include requirements to ensure that the Contingency Plan will be implemented as described and intended.

The Contingency Plan is designed to build on and be consistent with MWRA's regulatory and judicial obligations. The Plan also represents the matching of MWRA's obligations with a clear line of accountability to the Court, regulatory agencies, and the public.

Figure 28. Contingency plan process flowchart



outfall monitoring task force

In 1990, the Massachusetts Secretary of Environmental Affairs formed the Outfall Monitoring Task Force (OMTF) to advise the MWRA. The OMTF, composed of scientists and representatives from government agencies and regional environmental groups, guides MWRA's monitoring program. The Task Force directed MWRA to monitor in four general areas: effluent, water column, sediment, and living resources. The OMTF meets regularly to review MWRA's findings and approves changes in monitoring annually based on new scientific information. The Task Force also sets priorities regarding the environmental issues and questions MWRA should address with its monitoring program. OMTF meetings are open to the public.