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TOWN OF ACTON

BOARD OF HEALTH

MINUTES OF MEETING AUGUST 5, 1986

Present: Board Chairman Daniel Costello, members Richard Stephens, George Emmons, Charlotte Sagoff, associate member Richard Oakley. Staff present: Steven Calichman, Director of Health, Edward Wirtanen, Sanitarian, Carol Holley, Secretary.

The meeting opened at 7:42 p.m.

Delicicchi. 28 Simon Willard Road, Variance.

Upon query by Mr. Costello, Mr. Calichman stated that staff recommended the granting of the variance. The variance involves distance to wetlands. The current system is malfunctioning, and we are looking for a variance of Title 5 involving a 15 foot shortfall, plus or minus. Mr. Costello asked if this were the best location on site for the repair. Mr. Calichman advised that it was. Mrs. Sagoff asked how the Conservation agent felt about it, to which Mr. Calichman replied that the Conservation Commission found the site appropriate. Mr. Stephens asked if the parties were looking for a variance from Title 5 only. He then moved that the Board of Health grant a variance allowing the new leaching bed to be constructed at a distance of 35 feet or greater from the wetland, subject to the plan involved being reviewed and stamped by a registered sanitarian, per the Town's regulations. He then queried what was to be done with the old, malfunctioning system. Mr. Calichman stated that it was just to be cut off and let rest. Mr. Emmons then seconded the motion. The motion to grant the variance was unanimously carried.

8:00 p.m. Review of the minutes of the meeting of July 29. These minutes were reviewed and corrected. Mrs. Sagoff moved that the minutes be accepted as amended, Mr. Stephens seconded, and the motion unanimously carried.

A review of correspondence ensued. Regarding the Board of Selectmen liaison, Mr. Gilberti. Mr. Calichman stated that he, Priscilla Greene of the Nursing Service, and Mr. Gilberti were to meet to discuss the future of the Nursing Service. Mr. Costello requested that Board members be informed of the date and time of that meeting, once determined. Mr. Calichman went on to mention the Septage Management program, which is due before the Selectmen on September 1, 1986. Mr. Stephens asked if this were to be septage management, or pumping regulations, and pointed out that the Board had done a great deal of previous work on this matter. Mr. Costello mentioned that Town Counsel had submitted an opinion on the legal basis of the septage management issue on July 30, in response to a Board of Health request on May 15. He felt that the September 1 deadline should be extended in view of the time span between that request and response. A discussion of State regulations versus Town regulations ensued, and the difference between the two. The legal question asked of Town Counsel was whether or not the Board of Health had a right to enact mandatory pumping programs, and, if so, how the Board could get their money back if they had to get a system pumped for a delinquent owner. The issues of filing liens on property, Court procedures, etc. were discussed. A discussion of further questions to be posed to the Town Counsel dealing with enforcement mechanisms, and whether the Board should get involved in repairs as well, ensued.

Mr. Costello stated that the Management Program, in terms of Court procedures, would go for a Clerk's Ruling before other procedures. If the property owner does not comply with the Clerk's Ruling, then Town Counsel would get involved. Mr. Stephens stated that he read the matter to say that Home Rule legislation would be needed in order for the Board of Health to recoup costs of repair, but that the cost of pumping, a lesser cost, would not need home rule legislation. Mrs. Sagoff wondered if it were legal to post the names in the newspaper of individuals who do not or will not pump and/or repair their systems when necessary. At this time, Mr. Costello stated that these matters would have to be addressed at another meeting.

Mr. Costello then suggested that for the next meeting, the Board review the May request to Town Counsel, his reply to that request, and former Board member Nawrocki's draft regulations. Upon query on the deadling by Mrs. Sagoff, Mr. Costello stated that he felt the septage management isssue would be ready for the Selectmen by then. He mentioned the possible futility of developing a management system that could be shot down by the Selectmen due to the cost of enforcement and running of the program. Several thousand dollars worth of computer time will be involved. Mr. Costello stated that a cost analysis had to be done.

The Board then reviewed the memo from Mr. Calichman regarding water sampling. He stated that Nora Hanley was to perform a whole range of testing, and that some of the results would take a month.

A letter regarding Airco was reviewed next, and Mr. Costello mentioned the validity of the Board's position on Special Permits regarding industrial sites. Mr. Calichman went on to relate past histories of Airco and pollution of a pond, and how little had been done in the past. At one point a pond had been covered with 6-8 inches of fuel oil about 11 years ago, and Mr. Calichman had requested that the State investigate the matter after a fire had occurred in the area, and thick black smoke emerged from the pond area. He went on to state that Airco was to have hired an engineering firm to do a study on the problem, and that, to his knowledge, that had not been done.

8:25 Review of correspondence from Brook Run Condominium. Mr. Calichman stated that people from this condominium had been before the Board previously with problems with their septic system. They had requested, and received, permission for a peroxide treatment. The treatment took the edge off their problems for a while, but they have come back. The condominium is now looking for direction on how to hook into the Great Road Apartments Treatment Plant. Mr. Costello stated that basically, there seems to be no problem for the Board of Health, and that the problem would be one of contractual relations between the two developments involved. Mr. Calichman stated that he was not aware that any contractual negotiations were in process. He felt that this was just an exploratory letter. Mr. Emmons stated that in view of the request, he would like to see support data indicating the adequate capacity of the Great Road Treatment Plant, and the water usage of Brook Run. Mr. Costello requested copies of the Nagog Woods agreement to use as a possible guide.

8:27 Oversight Committee meeting. Nobody was quite sure what the oversight committee was. The title prompted speculation. Mr. Stephens mentioned that Mr. Halley had called him about the Selectmen backing off the Dimare property, and a need for a land acquisition committee was discussed.

8:30 Meineke Muffler. Mr. Costello asked about the number of variances would be involved in the plan originally submitted by Meineke and approved by Board of Health Staff. Mr. Calichman stated that he had reviewed the plan when 7-11 stores had looked into the property. Mr. Wirtanen had also reviewed the plan. Mr. Calichman explained that 7-11 had gathered data, and when they backed out of the property acquisition had made their data available to Mr. Yetman and his engineer, Mr. Dunphy. No perc tests had been done on the property. Mr. Costello asked if percs were required. Mr. Calichman stated that per the letter of the law they were, but the plan was filed with the Board Office prior to enforcement to the letter. There also was a question of the required depth of natural pervious material, as the site had been filled in about thirty years ago. A discussion then ensued as to what makes natural pervious material - how long and under what circumstances does it need to be on a site. There was also a question about the distance between the tank and a subsurface drain. A similar problem existed with reserve area. Mr. Wirtanen stated that while the tank could be relocated, the reserve area could not. Mr. Costello asked if there were a requirement for reserve area under a repair. Mr. Wirtanen stated that there was, under Title 5. Mr. Costello felt that the reserve area need not apply in repair situations. It is clear that new systems need a reserve area, however. Mr. Emmons stated that because this was a repair, and no reserve area was needed, then the variance for distance for reserve area was not necessary. Mr. Costello stated that the plan entailed two variances: no perc, and depth of natural pervious material. Mr. Costello felt that no unusual variances would be required by the Meineke plan. Mrs. Sagoff asked if the Board were awaiting State action. Mr. Costello stated that the Board was waiting for its own action. Mr. Stephens stated that Meineke has an approved plan, and a permit for construction. Mr. Calichman stated that Mr. Yetman had been in to see him with material regarding water saving toilets, and tight tank. Mr. Stephens stated that Mr. Yetman needed to act with due diligence. Mr. Costello asked if there were anything further to do with Meineke at that particular time. The issue of Meineke was tabled.

8:45 Memorandum on Kelley's Corner/20 Year Plan. A recess was called in order to review the memorandum prepared by Mr. Stephens and Mr. Emmons.

9:26 Recess declared over. Mr. Costello opened the discussion with a statement that he felt the Metcalf and Eddy report should be abandoned because it was so out of date. Nobody knew exactly the date of the report, but it was estimated to be about 1960. Mr. Costello stated that all other Boards and Committees in Town were concentrating on Anderson-Nichols and Lycott reports and, more recently, SEA report. He suggested that the Board of Health do the same. Mr. Costello stated that there were really two critical issues: the failure rate of systems in Acton, and how subsurface sewage disposal affects the groundwater. If the answer to either standard so indicated, we would not consider on-site solutions. We have also said to ourselves that we need mechanisms to give ourselves advise later on. I think these mechanisms are the failure rate and the groundwater quality. If groundwater quality was being affected, then we need to look at that. Mr. Costello then went on to discuss problem areas. He remembered that town meeting adopted alternative number 3 with provisions for Kelley's Corner. He had a question regarding Indian Village creeping into the issue as an area of concern. He was not aware that Anderson-Nichols had Indian Village as an area with extraordinary problems.

Mrs. Sagoff asked when Indian Village was built. Mr. Calichman replied in the early 50's through 60's. Mr. Costello stated that in 1980, by using Anderson-Nichols statistics, is the half-life of the area. You are right at the top of the bell curve in Indian Village; half the systems should have already failed, statistically. Mr. Calichman stated that he did not think that half have failed, but more activity is being seen.

Mr. Costello continued to state that in terms of continuing Board of Health policy regarding on-site systems, he did not believe that State regulations provide any leeway for nonimplementation of state policy. I think that we should look at the entire Town, not just Kelley's Corner to identify where communal systems would be appropriate.

Mr. Emmons stated that perhaps a second, separate memorandum for Kelley's Corner be prepared. Mr. Costello stated that there were two schools of thought on Kelley's Corner. I think we are going in on what a 20-year plan shuld be. We have to determine what leeway we have. Mr. Stephens stated he did not think there were two schools of thought. In the past couple of meetings, we have talked about Redstone, about the possibility of a treatment plan, those types of approaches. We, as yet, have nothing concrete before the Board. I hear Mr. Emmons saying that if we had a solution in front of us that did not look outrageous to the people at Redstone...George is quite openly looking at a combined approach. There is nothing in front of us but some optimistic thoughts. We need to take a more active role in evaluating the approach. If we are looking at cost of \$10,000 or more per unit, then we should be pursuing outside solutions. If we are looking at \$10,000 per unit or less, then we take a different approach.

Mr. Emmons stated that in writing the memoranoum about structured communal solutions, one of the ideas would be the cost of the interceptor from South Acton. Maybe we could combine all threee sites in one solution. Mr. Stephens stated that the Board certainly acts on a site-by-site basis. One of the things is going to be what are the criteria for evaluating a site. If, when the data come in, it appears that some of these sites cannot be fixed, then we look at communal systems. We can't sit back and wait for data gathering to happen because it could take years. Mrs. Sagoff asked if something has been thought up for Redstone, why hasn't the Board pushed it? Mr. Stephens replied that the idea did not hit until after the public meeting that we were ignoring the front field, which is working fine. We need to start pushing for solutions there.

Mr. Costello stated that we have at least three problem areas in Acton because they have failed systems without on-site solutions. They are all in South Acton. We have people on 2A building treatment plants and others who wish to join them.

Mr. Emmons stated that Redstone is a large user with a special problem requiring some additional thought.

Mr. Costello stated that the other large user special problems were solved by building small package treatment plants on site. I think this is the longest we have ever looked at a problem (Redstone). Mr. Stephens stated that the difference with Redstone is that the individual burden is larger. Mr. Emmons stated that there were 24 units. Mrs. Sagoff asked if it were possible to put in a treatment plant there.

Mr. Stephens stated that the issue was cost effectiveness. The point of the discussion is to pursue the data. We must proceed with getting the information in front of us. Mr. Costello stated, and Mr. Emmons reiterated, that if the data do not confirm an on-site solution, the decisions will be more difficult. Mr. Stephens stated that we Board would have to precipitate agreements.

Mr. Emmons stated that the Board had before them a draft of the 20-year plan. In the 20-year plan, it calls for a combination of on-site solutions and communal systems. We have before us Kelley's Corner, which is the first application of the 20-year plan. I would hate to see this point pass because of the one or two months that may be required to get some concepts for some solutions when we have waited three years for Sunoco. I think that ignoring this plan in its application to Kelley's Corner would be inconsistent.

Mr. Stephens stated that he believed that a very consistent first step would be, does a reasonable on-site solution exist? We have to answer this question for each area in which a problem exists. It is certainly appropriate to do criteria work for potential communal areas. It is consistent to go along parallel paths - I do not think it is inconsistent to take a dual path of action. We answer the question - is there a reasonable on-site solution, and if the answer is no, we will push harder than anyone else, but if there is a reasonable on-site solution then we have no choice but to adopt it.

Mrs. Sagoff stated that she thought the Board needed to be able to recognize that on-site solutions may fail all over town, and we need to be prepared for that. Mr. Costello stated that the Board needs to rethink whether or not we need the communal systems, or perhaps town wide sewers. Mrs. Sagoff stated that although we do not want to put them in now, we need to plan now. Mr. Costello stated that he thought that was the intent of the 20-year program, but what is to be done now?

Mr. Stephens stated that we need money, a treatment plant site, a disposal of effluent site. We also need to pursue the land bank system to cover each area individually with its own leaching system. That way, we do not have to be forced to provide a large sewer system. Mrs. Sagoff asked if what the Board is talking about now, is how long do you wait?

Mr. Emmons stated that that is covered under town-wide monitoring. It is not how long you wait but when are the conditions for doing something other than on site. Developing responsible criteria that are indicated.

Mr. Stephens stated that it is part of the recommendations that the Selectmen should start studying and gathering data. By the time we approach Kelley's Corner, we will have the framework to make a solution much easier.

Mr. Costello brought up the subject of the system repair fund. Under current federal regulations, repairs are eligible for grant funds, and this should be pursued. If the Town has a program of periodic inspection and maintenance, grant funds for repair can be funnelled through the Town.

Mr. Emmons asked if we should have a program regardless of where the money comes from? If so, let's just say that, and when we are faced with questions from the selectmen, discuss further. Mr. Stephens suggested that the Board just recommend that the selectmen pursue the matter. Mrs. Sagoff stated that the Board could sell the maintenance program by using the Federal grants for repair fund as leverage.

A debate followed on the future of federal funds, trends in Washington, etc. More discussion ensued on whether or not people would be willing to accept the grant monies.

The Board went through the draft, page by page, editing language as appropriate to reflect the unanimous concensus of the Board.

Mr. Costello then asked if the Board had reasonable consensus on pages 1 through 6 of the draft memorandum as adopted.. Mrs. Sagoff, the Board grammarian, was given this section of the draft to polish up.

Mr. Stephens then brought up the last paragraph, continuing Board policy.

Mr. Emmons stated that he understood the Town's legal obligations, but though the Board ought to begin to exercise the plan as written, and pursue other options. Mr. Costello asked how the Board would operate while the plan was being perfected. What is the Board's policy going to be?

Mr. Emmon asked if the Board could pursue an on-site solution and simultaneously ask for other solutions such as the structured communal system. I think, he stated, it is possible to do that.

Mr. Costello stated that he did not know of any mechanism in place for the 20 year plan. The Board is going to have to pursue on-site. \$10,000 has been set aside by Town Meeting. I do not know what we are supposed to do with it, but it will cost more than \$10,000. I do not think you have enough money for someone to take a look at an alternative solution for \$10,000.

Mr. Emmons stated that one way to investigate would be to have the potential participants be willing to fund, at some level, conceptualization of on-site versus communal systems. We can also cause a communal set of concepts to be drawn up, especially if they are willing to participate. Mrs. Sagoff stated that, in the meantime, nothing is happening. What is going to happen in the meantime? Mr. Emmons stated he thought it ws reasonable to have a reconnoiter. The quote from the firm Redstone hired was \$250,000; that's right on the break even point of \$10,000 per unit.

Mr. Calichman stated that the history with Redstone has been: they came before the Board, and we reached an agreement with them that they could have time if they gave us monthly reports, and pumped the system so that it does not flood into Kelley's Corner. It has overflowed since that time.

We have met with their engineers three or four times. We have not rushed headlong into anything at this point. Redstone is far more blatant than Sunoco, the number of gallons flowed onto Kelley's Corner from Redstone has been much more of a problem than Sunoco. I think that this Board has shown considerable patience. They were also supposed to pursue with the School Committee. To my knowledge, at least 18 months, they have yet to meet with the School Committee. They are just not looking at all their options.

Mr. Emmons asked if they understood all their options.

Mr. Costello said Mr. Stephens is proposing a different course of action. He suggests that we adopt the same procedure as we did with Pendergast, that they hire their engineer and the engineer meet with the Board to find out what we want and need. We adopted this policy because the engineer was not getting our message. I do not think this Board is opposed to people in Kelley's Corner getting together and looking at another option, but I do not know if this Board has the authority to make them do that. I do not know what the mechanism is, except that GPCC and the Selectmen have to appropriate some money.

Mr. Calichman stated that, at his invitation, we asked people to get together to discuss the communal option, but no one has carried the ball in the private sector.

Mr. Stephens suggested another following paragraph in the memo regarding communal systems. If we have in hand a cost effective, on-site solution, we order the repairs to be done and we will conclude that there is no need for the communal approach.

Mr. Costello stated that the main concern with that is that you are lumping Kelley's Corner with other areas of town. We have to decide whether or not the 20 year program addresses the issue or whether we want to isolate Kelley's Corner.

11:00 p.m. Mr. Emmons moved to accept the draft. Mr. Stephens seconded. The motion carried unanimously. The edited memo as accepted by the Board is attached.

Mr. Stephens then asked about assembling data.

Mr. Calichman stated that at this point, we have plans in front of us by Meineke. Mr. Yetman is going to be coming in. I would advise that he use a professional engineer. Mr. Stephens would like to see accurate water usage readings for that site. Mr. Calichman stated that, regarding Sunoco, we should issue them an order. They have an order, and we need to put them on a timetable. My recommendation would be to put definite time frames, with the ultimate threat to getting an injunction to cease operation. With Redstone again, I think it is appropriate to request that they come in and we get a status report and we evaluate the Board's position on giving them time, with the proviso they keep us informed and they keep sewerage off the ground.

Mr. Costello asked, what about having them get their engineer in here?

Mr. Emmons asked, what about having them all come in at once, and laying it on the line with them?

Mr. Calichman said that if we are going to do that, I would include MacDonald's

Mr. Emmons then discussed GPCC meeting about Ice House Pond. He suggested that something be done at the next Town Meeting to reinstate Ice House Pond as a Red Zone.

Mr. Calichman mentioned his dealings with Bruce Stamski re 138 Great Road and Ice House Pond, and his experiences with Mr. Morrison's attorney regarding that property abutting the pond.

Mr. Costello asked Mr. Calichman about the typing up of past minutes, who advised that Mrs. Bailey was working on them.

11:20 p.m. Charlotte Sagoff moved to adjourn. Adjourned.

Respectfully submitted,

Carol Holley
Carol Holley, Secretary

Signed and approved,

Daniel Costello
Daniel Costello, Chairman

INTERDEPARTMENTAL COMMUNICATION

TO: Board of Selectmen and Groundwater Protection DATE: August 6, 1986
Coordination Committee

FROM: Board of Health

SUBJECT: 20 Year Wastewater Management Program and Kelley's Corner

We herewith submit the recommendations of the Board of Health for a 20 Year Wastewater Management Program for Acton, as per your request.

BACKGROUND:

Relevant to the analysis and discussion are studies commissioned during approximately the past thirty (30) years. These include:

1. Acton Facilities Plan, Anderson and Nichols (1980)
2. Lycott Report, Lycott (1982)
3. SEA Report, SEA Consultants (1985)

The Anderson-Nichols report recommends the continued use of on-site systems, with certain modifications to the management aspects of the total program. This recommendation is consistent with the Lycott Report's findings on well water quality. The SEA Report alters total reliance on on-site systems by including a limited, structured (sewer) system. Each successive Report was based on the evaluation of:

1. All previous Reports;
2. All available data in town records;
3. Data which each firm assembled during its analyses;
4. Input from public hearings.

One element of every report has remained steadfast: South Acton presents a unique situation and must be addressed independently of all others. Great care must be taken to assure that the impending solution to South Acton be implemented and not jeopardized.

Another constant in Acton's wastewater disposal situation is the rate of septic system failure. As more data are assembled, they tend to support the 1% failure incidence. On-site systems do serve the Town's overall needs as anticipated. Current concerns are directed at specific neighborhoods rather than at the Town as a whole.

The Anderson Nichols Report described four scenarios for wastewater management in Acton:

1. Only septic systems (the "no new action" option)
2. A wastewater plan that included mandatory maintenance.
3. Communal systems to serve areas of concern
4. A Town-wide sewer system

At its last Town Meeting #3 (above) was adopted de facto by the Town with the acceptance of a plan to sewer a limited region of South Acton. Current debate focuses now on the further refinements of this strategy; notably:

1. Are there other areas of the Town with severe problems which would suggest a community approach;
2. What criteria should be used to select and define such areas;
3. What is the appropriate time for implementing such systems?

In reviewing the above considerations, the Board of Health has been cognizant of the following:

1. The two critical issues that determine the appropriateness of on site systems are the continued effectiveness of these systems (acceptably low failure rates) and their limited impact on water quality within the Town. Contrary conclusions on either of these two points, either for the Town or for specific neighborhoods, would dictate use of sewers and wastewater treatment plants for those areas.
2. There is a distinct difference between the need for sewers as the only viable alternative, and the desire for sewers as a method of choice among technically acceptable alternatives.
3. The choice between the need and the desire for sewerage systems must be made based upon technical analysis of health, environmental, and engineering factors; as well as the economic and socio-political factors.

CONCLUSIONS

Based on all of the above considerations, the Board of Health concludes the following:

1. The Anderson-Nichols, Lycott and SEA Reports address the environmental and wastewater management issues in a reasonable, responsible, and implementable manner.
2. The need for a community approach to the sewage disposal problems in South Acton has been well documented, and implementation of an effective solution for these problems must be accelerated to the maximum extent possible. The planned sewer system with connection to the Maynard treatment plant or to an Acton owned facility on Adams Street provides a reasonable solution to these problems.
3. The need for a community approach in other parts of Acton or for the entire Town has not been documented in any of the reports to date. Many neighborhoods in Acton have good soils and large lot sizes where on-site systems are expected to operate well for fifty years or more. Repairs, if needed, are expected to be relatively easy because after 1966 the availability of additional expansion area was a condition of development. These areas of the Town could rely upon on-site systems indefinitely.

There are other areas of the Town which have much poorer soils, smaller lot sizes, and were developed prior to 1966. On-site systems will work in these areas but repairs are more difficult and may require variances to state and local codes.

Finally, some land uses are ill-suited to on-site systems particularly fast food restaurants and dischargers of large volumes. Many such systems in Acton have already been converted to small package treatment plants dedicated to specific users, and similar systems have already been adopted for large community approaches, as is the case with Nagog Village.

It is clear that selection between on-site and communal systems will vary throughout the Town depending on soil conditions and land use in that locale.

~~4.~~ Acton will very likely be able to rely on on-site systems for all of the Town except South Acton for the next twenty years. There are no documented areas in Town with the widespread record of failure to the extent of South Acton. However, for a limited number of areas such as Kelley's Corner and Indian Village it may be to the residents' advantage to adopt a community solution rather than on-site systems. Such cluster areas should be investigated as soon as possible. Clearly in the long term Acton will need flexibility to respond appropriately and effectively to the specific state of deterioration of on-site systems as they show up throughout the Town.

To ensure this flexibility, Acton must develop an approach to community sewage treatment of other areas as the need arises. The limiting factors to this approach are cost, treatment site and the ultimate disposal site for effluent.

RECOMMENDATIONS:

Accordingly, the Board of Health recommends that:

1. The Groundwater Protection Coordination Committee and the Board of Selectmen adopt and implement a 20 Year Program at the earliest possible time.
2. Alternative #3 of the Anderson-Nichols Report be adopted as part of Acton's 20 Year Plan because of the flexibility that it provides for the possibility that other areas of town will need community solutions in the future.

Also, the Board of Health recommends that the 20 Year Plan include, as minimum, provision for the following activities:

1. Septic System Data Base

Establish a computerized data base to facilitate the following:

- a. Enforcement of pumping interval regulations and analysis of pumping activity (gallons pumped in 2 years vs total town septic system, capacity, etc.)

- b. Identification of problem areas by analysis of failure rates by area of town, by ages of systems, etc.

2. Townwide Monitoring

This should include establishing - in cooperation with the Water District - permanent surface and ground water monitoring stations to conduct a continuing, comprehensive, water quality monitoring program. The computerized data base for septic system monitoring should be used in conjunction with this activity to evaluate and analyse potential problems that may require Town action.

3. Evaluation Criteria

Criteria for adopting communal solutions for other parts of Town should also be developed. These should be based on failure rates, geographic conditions, and economic conditions.

4. New Regulations Must Be Formulated and Adopted On:

1. Design, maintenance, and inspection of grease traps;
2. Maintenance and inspection of sand and gasoline traps;
3. Use of on-site systems rejuvenation chemicals;
4. Design of on-site systems in soils with rapid percolation rates;
5. Standards of performance of package treatment plants; and
6. The size of septic systems for large users.

This activity would include the periodic review of existing regulations to determine whether revision is required.

5. Public Education

This activity should include formulation of methods of teaching citizens the social, environmental, health and microbiological aspects of on-site systems.

6. Community System Development

To prepare the Town for the potential need for either more than one community sewage system, or expanding the existing system, action must be taken now to ensure that sewage or treatment plan effluent will have an ultimate disposal destination. Plans for two alternative approaches must be developed:

- a. Assabet River: the Town staff should update the sewer system proposed by Metcalf and Eddy to accommodate the current size and expected growth of Acton in the future. The updated plan will

provide a master plan for expansion of the South Acton concept where effluent from either the Maynard treatment plant or an Acton owned treatment plant is discharged to the Assabet River.

b In-Town Leaching - the Town should develop an aggressive approach to land banking for use as ~~commercial~~ ^{commercial or community} leaching fields. Suitable parcels of land which can serve the Town's recreation or conservation needs, but which could also serve as sufficient area for the community leaching fields of small package treatment plants serving specific impacted neighborhoods. This approach would limit sewerage to the affected areas only and would allow the systems to be built as needed. Appropriate selection of open land for such land-banking would assure that all areas of the Town have potential disposal fields and thus avoid necessitating the eventual connection of the entire Town to South Acton's sewerage system.

7. System Repair Fund

State and federal grants are available to communities to use for system repair. We recommend that the Selectmen should apply for these state and federal fund grants and loan funds as appropriate to assist in financing such a program.

CONTINUING BOARD POLICY:

Planning and implementation of the twenty year program outlined above will take considerable time. The Board of Health believes current enforcement actions in impacted areas must continue toward development of reasonable on-site solutions for known problems. This is particularly true in Kelley's Corner where sporadic outbreaks of sewage from three known sources pose serious health threats. We believe on site solutions can be found in Kelley's Corner, and, accordingly, we will continue to pursue and implement these solutions until such time as alternative solutions have been implemented by the Town.

We believe that it is appropriate for the Town to simultaneously develop criteria and conceptual plans for a communal system for Kelley's Corner. The Board of Health will willingly cooperate in this effort. In particular, we will have data on the cost and anticipated effectiveness of on-site systems assembled. The results of this forthcoming effort will provide an essential first step in determining if there is sufficient need for a communal approach.

Erratum Sheet

IDC to Board of Selectmen and Groundwater Protection
Coordination Committee from Board of Health
dated August 6, 1986

Please note on Page 5, 5th line down, the word "commercial"
should read "communal".

I apologize for the error.

Carol Holley
Carol Holley, Secretary

August 14, 1986