



## ACTON BOARD OF HEALTH

---

Douglas Halley  
Health Director

472 Main Street  
Acton, MA 01720

Telephone 978-264-9634  
Fax 978-264-9630

Feb 13<sup>th</sup>, 2008

Joe Horrigan  
Avalon Acton WWTF  
84 Nagog Park,  
Acton, Ma 01720

Mr Horrigan,

At their regularly scheduled meeting on Feb 4<sup>th</sup> 2008, the Acton Board of Health unanimously approved Avalon Acton's application for a Hazardous Materials Control Permit for Wastewater Treatment Facility (WWTF) located at 24 Durkee Lane Westford, MA

This location is approved under the following categories:

- #4 Hazardous Materials User
- #9 Hazardous Materials Storage; Small Industry

This permit is approved under the following conditions:

1. All Hazardous Materials and Wastes shall be stored in a containment area capable of storing 110% of the largest unit volume stored in the containment area.
2. All Material Safety Data Sheets (MSDSs) for the Hazardous Materials shall be stored on site, and shall be made available to all employees upon request and reviewed with all employees on a regular basis.
3. A Contingency Plan, including emergency contact numbers (Telephone Number of the owner, operator, etc.) and a sketch showing clearly all Hazardous Material and Waste locations, shall be submitted and updated annually, to the Board of Health, Fire Department, Police Department, and Civil Defense.
4. Emergency procedures and local Emergency Response Telephone Numbers (Health, Fire, Police, D.E.P., Civil Defense, etc.), should a spill occur, shall be posted in clear view of all employees wherever Hazardous Materials or Wastes are used or stored.
6. Copies of either all invoices or manifests for any Hazardous Materials or Wastes, received or disposed of, shall be submitted to the Board of Health annually.

8. Speedy Dry, or its equivalent, shall be kept in the storage area, in case of a Hazardous Materials or Wastes spill.

11. Protective equipment, including chemical resistant gloves, eye goggles and (rubber) boots, in addition to soap and water, shall be made available to all employees, at all times, in any Hazardous Materials or Waste storage or use area.

13. A safety eye wash station shall be installed where any Hazardous Materials or Wastes are handled or used.

14. A fire extinguisher, containing an appropriate fire extinguishing agent, shall be placed in the Hazardous Materials Storage area.

15. No food or drink shall be stored or consumed in any area where Hazardous Materials are stored or used.

18. D.E.P. Generator Registration shall be provided annually upon renewal of the Hazardous Materials Storage Permit.

25. Prior to any new chemical or processes being used, the Board of Health shall be notified.

26. The operation of this facility shall be in compliance with all present and future regulations of E.P.A. and D.E.P. at all times. Nothing in this permit allows or requires non-compliance with all present and future applicable laws or regulations of the Federal or State Governments.

Please complete the enclosed Hazardous Material Permit and return it to the Acton Board of Health Office along with a payment of \$365.00. This permit will become effective May 1<sup>st</sup>, 2008. This Hazardous Materials Permit must be renewed by May 1<sup>st</sup> annually in order to avoid additional fees. Please be aware that the permitted site at 24 Durkee Lane, Westford, MA is subject to annual compliance inspections as well.

Please contact the BOH office within seven (7) days upon receipt of this letter to schedule a final inspection of the site ensuring compliance with the above conditions.

If you have any questions concerning this approval or the above conditions please contact me at (978) 264-9634 or email at [jsnair@acton-ma.gov](mailto:jsnair@acton-ma.gov)

Sincerely,

Justin T. Snair  
Environmental Health Agent

Cc: Doug Halley

01/30/08

**Report on Site Visit:**

**Location**

Avalon Acton WWTF  
24 Durkee Ln.  
Westford, MA

**Contact during Visit:**

Joe Horrigan  
Avalon Acton WWTF  
84 Nagog Park,  
Acton, Ma 01720

Date of Initial Permitting Inspection: Jan. 29<sup>th</sup> 2008  
Environmental Health Agent: Justin T. Snair

**Description of Hazardous Materials Use**

The Westford Wastewater Treatment Facility (WWTF) located at 24 Durkee Lane Westford, MA facilitates waste water treatment for Avalon Bay housing units located in Acton, MA. The Westford WWTF site includes one 1000 gal. diesel aboveground storage tanks (AST) and 500 gal. propane AST. Both tanks are meant to provide emergency power to the Westford WWTF.

The 1000 gal diesel fuel AST is a double walled steel tank providing 110% secondary containment in the event of an internal tank failure. Double walled aboveground piping is used for the fuel feed and return lines. The tank is equipped with a visual sight glass and an audible alarm which will notify the facility staff that the tank is compromised. The tank is placed on a concrete pad and is raised off the ground. The WWTF operator is responsible for performing weekly visual inspections.

The 500 gal. propane AST is placed on a concrete pad and is raised off the ground.

Sodium Hypochlorite, 20 gals, in 4, 5 gal containers.

Micro C 55 gal

Sodium Bicarbonate (Dry Bags) 300 lbs, in 12, 25 lb bags

Aluminum Chloride, 55 gals

## **Comments**

The application for Hazardous Materials/Waste Permitting is in-complete. Avalon Acton must disclose a process plan describing the use of all hazardous materials stored/used on site. A description of the 500 gal. propane AST must also be submitted. MSDS's and Emergency Plans are not currently posted at a conspicuous location close to hazardous material site.

## **Recommendations**

I recommend the Avalon Acton WWTF located at 24 Durkee Ln. Westford, MA receive a Hazardous Material/Waste Control Permit (#4 hazardous material user, # 9 hazardous material storer/industry small).

I recommend the following conditions be included in the permit:

1. All Hazardous Materials and Wastes shall be stored in a containment area capable of storing 110% of the largest unit volume stored in the containment area.

2. All Material Safety Data Sheets (MSDSs) for the Hazardous Materials shall be stored on site, and shall be made available to all employees upon request and reviewed with all employees on a regular basis.

3. A Contingency Plan, including emergency contact numbers (Telephone Number of the owner, operator, etc.) and a sketch showing clearly all Hazardous Material and Waste locations, shall be submitted and updated annually, to the Board of Health, Fire Department, Police Department, and Civil Defense.

4. Emergency procedures and local Emergency Response Telephone Numbers (Health, Fire, Police, D.E.P., Civil Defense, etc.), should a spill occur, shall be posted in clear view of all employees wherever Hazardous Materials or Wastes are used or stored.

6. Copies of either all invoices or manifests for any Hazardous Materials or Wastes, received or disposed of, shall be submitted to the Board of Health annually.

8. Speedy Dry, or its equivalent, shall be kept in the storage area, in case of a Hazardous Materials or Wastes spill.

11. Protective equipment, including chemical resistant gloves, eye goggles and (rubber) boots, in addition to soap and water, shall be made

available to all employees, at all times, in any Hazardous Materials or Waste storage or use area.

13. A safety eye wash station shall be installed where any Hazardous Materials or Wastes are handled or used.

14. A fire extinguisher, containing an appropriate fire extinguishing agent, shall be placed in the Hazardous Materials Storage area.

15. No food or drink shall be stored or consumed in any area where Hazardous Materials are stored or used.

18. D.E.P. Generator Registration shall be provided annually upon renewal of the Hazardous Materials Storage Permit.

25. Prior to any new chemical or processes being used, the Board of Health shall be notified.

26. The operation of this facility shall be in compliance with all present and future regulations of E.P.A. and D.E.P. at all times. Nothing in this permit allows or requires non-compliance with all present and future applicable laws or regulations of the Federal or State Governments.



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Douglas Halley  
Health Director

472 Main Street  
Acton, MA 01720

Telephone 978-264-9634  
Fax 978-264-9630

### Location:

Avalon Acton WWTF  
24 Durkee Ln.  
Westford, MA

### Contact during Visit:

Joe Horrigan  
Avalon Acton WWTF  
84 Nagog Park,  
Acton, Ma 01720

Date of Initial Permitting Inspection: Jan. 29<sup>th</sup> 2008  
Environmental Health Agent: Justin T. Snair

### Description of Hazardous Materials Use

The Westford Wastewater Treatment Facility (WWTF) located at 24 Durkee Lane Westford, MA facilitates waste water treatment for Avalon Bay housing units located in Acton, MA. The Westford WWTF site includes one 1000 gal. diesel aboveground storage tanks (AST) and 500 gal. propane AST. Stored on site are also 20 gals of sodium hypochlorite, 55 gals of Micro C, 300 lbs of sodium bicarbonate, 55 gals of aluminum chloride.

The diesel fuel AST (1000 gal) is a double walled steel tank providing 110% secondary containment in the event of an internal tank failure. Double walled aboveground piping is used for the fuel feed and return lines. The tank is equipped with a visual sight glass and an audible alarm which will notify the facility staff that the tank is compromised. The tank is placed on a concrete pad and is raised off the ground. The WWTF operator is responsible for performing weekly visual inspections. The diesel AST is meant to provide fuel the back-up generator for the WWTF.

The propane AST (500 gal) is placed on a concrete pad and is raised off the ground. It is used for heating of the WWTF.

Sodium Hypochlorite (20 gals, stored 4, 5 gal containers) is used for semi-annual cleaning of the membrane units.

Micro C (55 gal) is a carbon source that can be used to enhance denitrification in the treatment process.

Sodium Bicarbonate (300 lbs, in 12, 25 lb bags) used to adjust wastewater alkalinity in the treatment process.

Aluminum Chloride (55 gals) can be used if future discharge permits require phosphorous removal

Total Amount of Hazardous Materials: 1630 gals wet materials; 300 lbs materials.

### **Comments**

The application for Hazardous Materials/Waste Permitting is complete. MSDS's and Emergency Plans are not currently posted at a conspicuous location close to the hazardous material site; however Avalon Acton has been notified and is working towards compliance. Avalon Acton must have MSDS's and Emergency Plan posted within two (2) weeks of permitting.

### **Recommendations**

I recommend the Avalon Acton WWTF located at 24 Durkee Ln. Westford, MA receive a Hazardous Material/Waste Control Permit (#4 hazardous material user, # 9 hazardous material storer/industry small).

I recommend the following conditions be included in the permit:

1. All Hazardous Materials and Wastes shall be stored in a containment area capable of storing 110% of the largest unit volume stored in the containment area.
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3. A Contingency Plan, including emergency contact numbers (Telephone Number of the owner, operator, etc.) and a sketch showing clearly all Hazardous Material and Waste locations, shall be submitted and updated annually, to the Board of Health, Fire Department, Police Department, and Civil Defense.
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26. The operation of this facility shall be in compliance with all present and future regulations of E.P.A. and D.E.P. at all times. Nothing in this permit allows or requires non-compliance with all present and future applicable laws or regulations of the Federal or State Governments.



## ACTON BOARD OF HEALTH

Douglas Halley  
Health Director

472 Main Street  
Acton, MA 01720

Telephone 978-264-9634  
Fax 978-264-9630

Jan. 29, 2008

Joe Horrigan  
Avalon Acton WWTF  
84 Nagog Park,  
Acton, Ma 01720

Dear Mr. Horrigan;

The Acton Health Department has completed its initial inspection for Hazardous Materials Permit and has found the following discrepancies:

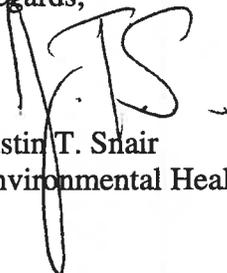
- MSDS's for all disclosed hazardous materials must be posted at a conspicuous location
- An Emergency Response Plan, to include Emergency Spill Procedures, must be posted at a conspicuous location. Include emergency contact information to be used regarding a spill removal/cleanup and the name/number of the proposed licensed hazmat/waste cleanup agent.
- Disclose information regarding the 500 gal propane tank at the site.
- Disclose processes regarding the use of all hazardous materials located on site.
- Updated site plan reflecting storage locations of Sodium Hypochlorite, Micro C, Sodium Bicarbonate, Aluminum Chloride.

*JB Received 2/1/08*

Please correct the above discrepancies and send pictures of the posted items to [jsnair@acton-ma.gov](mailto:jsnair@acton-ma.gov). After proof of compliance, the BOH office will be proceed with the permitting process.

If you have any questions, please contact me at (978) 264-9634 or by the above email.

Regards,

  
Justin T. Snair  
Environmental Health Agent



# TRANSMITTAL

1000 Bridgeport Ave, Suite 258  
Shelton, CT 06484

**Community:** Avalon Acton  
**PM:** Thomas Pennell  
**PM Phone :** 203-926-2310  
**Asst. PM/Super:**  
**Asst. PM/Super Ph # :**

**Date:** 01/24/2008  
**Project #:** MA561  
**Fax:** 203-926-9731  
**Transmittal #:**

### DISTRIBUTION / Send to Via:

FAX       MAIL       COURIER       PICK-UP       HAND CARRY

**TO:** -  Not Established Vendor

**Name:** Town of Acton  
Health Department  
472 Main Street  
Acton, MA 01720

**Attention:** Justin T. Snair

Copy to:

### TRANSMITTED:

PLANS       SPECS       SUBMITTAL       CORRESP       OTHER

Copies	Dated	# of Pages	Description
1		1	Hazardous Material Inventory Information
1		25	Material Safety Data Sheets

### TRANSMITTED AS CHECKED BELOW;

<input type="checkbox"/> FOR APPROVAL	<input type="checkbox"/> APPROVAL AS NOTED	<input type="checkbox"/> FOR YOUR SIGNATURE & RETURN
<input type="checkbox"/> FOR YOUR USE	<input type="checkbox"/> FOR REVIEW AND COMMENT	<input type="checkbox"/> RESUBMIT FOR APPROVAL
<input checked="" type="checkbox"/> AS REQUESTED	<input type="checkbox"/> APPROVED AS SUBMITTED	<input type="checkbox"/> FOR YOUR FILES
<input type="checkbox"/> RETURN AFTER USE	<input type="checkbox"/> RETURNED FOR CORRECTIONS	<input type="checkbox"/> OTHER

### REMARKS:

### SIGNED:

Printed Name: Joe Horrigan

DATED: 1.24.08

### A. Hazardous Materials (non-waste) Inventory Information

Complete the table below for all non-waste inventory. Use additional pages if necessary.

Hazard Class	Chemical/Common Name	Max. Qty (at any one time)	Container Size (single largest container)	Location(s) (see section C)
	Sodium Hypochlorite	<u>20</u> gal. ____ lbs. ____ cu. . ft.	<u>5</u> gal. ____ lbs. ____ . ft.	Chemical Room
	Micro C	<u>55</u> gal. ____ lbs. ____ cu. . ft.	<u>55</u> gal. ____ lbs. ____ cu. . ft.	Chemical Room
	Sodium Bicarbonate (Dry Bags)	____ gal. <u>300</u> lbs. ____ cu. . ft.	____ gal. <u>25</u> lbs. ____ cu. . ft.	Chemical Room
	Aluminum Chloride	<u>55</u> gal. ____ lbs. ____ cu. . ft.	<u>55</u> gal. ____ lbs. ____ cu. . ft.	Chemical Room
	Diesel Fuel	<u>1,000</u> gal. ____ lbs. ____ cu. . ft.	<u>1,000</u> gal. ____ lbs. ____ cu. . ft.	Outdoor Above Ground Tank
	Propane	<u>500</u> gal. ____ lbs. ____ cu. . ft.	<u>500</u> gal. ____ lbs. ____ cu. . ft.	Outdoor Above Ground Tank

### B. Hazardous Waste Inventory Information

(Hazardous Waste Generator Permit Application/Amendment)

Complete the table below for all waste inventory. Use additional pages if needed.

Hazard Class	Name of Hazardous Waste	Treatment/Disposal Method(s) (Definitions provided on bottom of page)	Max. Qty. (at any one time)	Annual Qty. Generated	Location(s) (see Section C)
		____ Recycled on-site. ____ Treated on-site. ____ Shipped off-site for recycling/ treatment /disposal	____ gal. ____ lbs. ____ cu. ft.	____ gal. ____ lbs. ____ cu. . ft.	
		____ Recycled on-site. ____ Treated on-site. ____ Shipped off-site for recycling/treatment/disposal	____ gal. ____ lbs. ____ cu. . ft.	____ gal. ____ lbs. ____ cu. . ft.	
		____ Recycled on-site. ____ Treated on-site. ____ Shipped off-site for recycling/treatment/disposal	____ gal. ____ lbs. ____ cu. . ft.	____ gal. ____ lbs. ____ cu. . ft.	
		____ Recycled on-site. ____ Treated on-site. ____ Shipped off-site for recycling/treatment/disposal	____ gal. ____ lbs. ____ cu. . ft.	____ gal. ____ lbs. ____ cu. . ft.	
		____ Recycled on-site. ____ Treated on-site. ____ Shipped off-site for recycling/treatment/disposal	____ gal. ____ lbs. ____ cu. . ft.	____ gal. ____ lbs. ____ cu. . ft.	



## ACTON BOARD OF HEALTH

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Douglas Halley  
Health Director

472 Main Street  
Acton, MA 01720

Telephone 978-264-9634  
Fax 978-264-9630

Jan. 11, 2008

Joe Horrigan  
Avalon Acton WWTF  
84 Nagog Park,  
Acton, Ma 01720

Dear Mr. Horrigan;

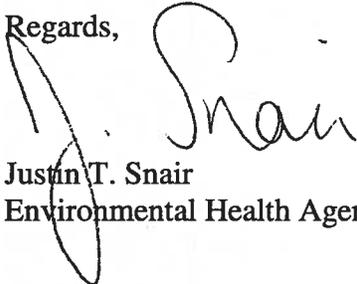
The Acton Health Department has received your application for a Hazardous Materials Permit and has found the following discrepancies:

- All hazardous materials/wastes and their amounts must be listed on the Hazardous Materials and Wastes Inventory List. Please complete the enclosed form; be sure to include all materials/wastes included on your submitted MSDS's and diesel fuel.

The application process can not continue until all required information has been received.

If you have any questions, please contact me at (978) 264-9634.

Regards,

  
Justin T. Snair  
Environmental Health Agent



**TOWN OF ACTON**  
**HEALTH DEPARTMENT**  
472 Main Street  
Acton, Massachusetts, 01720  
Telephone (978) 264-9634  
Fax (978) 264-9630

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December 12, 2007

Avalon Acton WWTF  
24 Durkee Ln.  
Westford, MA

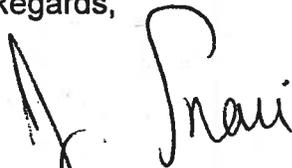
Dear Applicant:

The Acton Health Department has reviewed your application for a Hazardous Materials Permit for Avalon Acton, 24 Durkee Ln. Westford, MA 01770. At this time we cannot approve your hazardous materials permit for the following reasons:

- 1) Missing emergency or contingency plan for an accidental spill
- 2) Missing overall site plan of premises showing where chemicals are stored (including tanks and piping).
- 3) Missing disposal methods (if any required) and name of proposed licensed hazardous waste hauler.
- 4) Missing completed list of hazardous materials detailing chemicals, amounts, and storage methods. (use enclosed *List of hazardous materials*)

Please correct the above issues and submit completed application to the Acton Health Department Office.

Regards,



Justin T. Snair  
Public Health Agent