

## TOWN OF EXETER, NEW HAMPSHIRE

10 FRONT STREET • EXETER, NH • 03833-3792 • (603) 778-0591 • FAX 772-4709

[www.town.exeter.nh.us](http://www.town.exeter.nh.us)

January 15, 2013

Ms. Joy Hilton  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100 (OES04-3)  
Boston, MA 02109-3219

Re: CSO Abatement Planning Requirements  
Administrative Order Docket No. 010-024  
Exeter, New Hampshire

Dear Ms. Hilton:

The Town of Exeter is hereby submitting this letter and report to fulfill the requirements of the CSO Abatement Planning Requirements of Item IV.2 of the referenced Administrative Order. As you recall, Exeter was in the middle of completing an I/I evaluation when the Administrative Order was issued. EPA accepted the existing scope of work to develop the LTCP.

We understand EPA has offered an extension of our January 15, 2013 deadline to submit the final document and report until March 16, 2013. Although the engineering work is complete, additional time is needed to review the recommendations with our governing boards including the Town of Exeter Water/Sewer Advisory Committee and the Board of Selectmen. In keeping with the original date however, we have enclosed the draft report. We do anticipate submitting a revised report following review by the Town prior to March 16, 2013.

The Town is committed to the goal of reducing and eliminating CSOs. However, the Town is also faced with the WWTF Upgrade including meeting an 8 mg/l (N) in 5-years and 3 mg/l (N) in 15 years at an estimated cost of \$30 to \$50M. Given the current economic climate, the overall affordability of these projects for a small community like Exeter is an issue that needs to be evaluated as WWTF costs and success of the I/I program become better defined.

Over the next 5 years the Town is committed to the previously authorized \$3,400,000 for sewer improvements in Jady Hill (currently under construction) as well as an additional \$1,250,000 of additional I/I projects and evaluations aimed at CSO mitigation pending voter approval (see attached schedule). The main driver for this CSO mitigation schedule is that the Town must evaluate and confirm the success of the Jady Hill Area Utility Project as well as implement and evaluate the next two I/I pilot areas before committing significant additional funding to similar

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projects. In addition, recent sewer flow record analysis indicates previously unrecognized direct inflow that significantly contributes to CSOs. The Town plans to focus on identifying and removing these "low hanging fruit" over the next 5 years to optimize CSO mitigation.

Over the past several years the Town has taken it upon itself to implement improved wastewater and CSO flow metering. Additional monitoring of new sewer/CSO metering is also needed to further develop next steps and design flows.

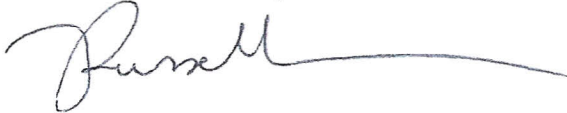
Furthermore, the Wastewater Treatment Facilities Plan is needed by mid-2014 to evaluate WWTF alternatives. To further evaluate CSO mitigation options, the Facilities Plan will include:

- Assessment of the new WWTF to treat CSO flows
- Assessment of the new WWTF to equalize and treat CSO flows
- Considerations for CSO flow treatment now vs. future

Please call if you have any questions or need any additional information.

Sincerely,

TOWN OF EXETER, NEW HAMPSHIRE



Russell Dean  
Town Manager

encl.

cc. Robert Kelly, P.E., Exeter Water Sewer Advisory Committee  
Jennifer Perry, P.E., Public Works Director  
Paul Vlasich, P.E., Town Engineer  
Tracy L. Wood, P.E., NHDES (w/attachments)  
Keith Pratt, P.E., Underwood Engineers

**Table 14-1**  
**Suggested CSO LTCP Sewer Implementation Schedule and Cash Flow - 5-Year Plan**

Sewer Improvement Project/Program	Total Budgetary Cost <sup>3,4,5</sup>	Project Year															
		2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	2025	2026	2027	
WWTF Improvements <sup>2</sup>																	
Facility Plan	\$375,000	\$375,000															
Design	TBD		TBD	TBD													
Construction	TBD				TBD	TBD											
Phase I On-Line (8 mg/L) <sup>9</sup>	TBD						*										
Non-point Nitrogen Evaluations and Controls <sup>9</sup>	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD						
Phase II On-Line (3 mg/L)- If Necessary, TBD <sup>9</sup>	TBD																
Long Term CSO Control Plan																	
Submit Report		*															
Jady Hill Project <sup>1,6</sup>																	
Construction	\$3,436,000	\$3,436,000															
Evaluation/Assessment	\$20,000		\$20,000														
Additional Evaluations/Monitoring/TV/Implementation	\$515,000		\$265,000		\$250,000												
Manhole Rehabilitation			\$60,000	\$40,000	\$11,000	\$11,000											
Downing Ct./Westside Drive <sup>1,8</sup>																	
Design	\$40,000			\$40,000													
Construction/Implementation	\$500,000			\$500,000													
Evaluation/Assessment	\$40,000				\$40,000												
Subtotal Additional I/I Projects LTCP Driven		\$3,436,000	\$345,000	\$580,000	\$301,000	\$11,000											
Sewer Collection CIP <sup>7</sup>																	
Portsmouth Avenue Sewer	\$940,000	\$940,000															
Lincoln Street Sewer	\$196,000		\$196,000														
Sewer Line Replacement	\$1,700,000			\$850,000		\$850,000											
Subtotal Existing CIP Sewer Projects		\$940,000	\$196,000	\$850,000	\$0	\$850,000											
ANNUAL TOTAL LTCP AND EXISTING SEWER CIP (WWTF COSTS NOT INCLUDED)		\$4,376,000	\$541,000	\$1,430,000	\$301,000	\$861,000	\$TBD	\$TBD	\$TBD	\$TBD	\$TBD	\$TBD	\$TBD	\$TBD	\$TBD	\$TBD	
		5-YEAR LTCP COMMITMENT (I/I)					10-YEAR PHASE II LTCP										
		\$3.34M Jady Hill + \$1.24M Additional					Costs TBD if needed										

**Notes:**

- 1 Pilot areas should be done initially to further refine private I/I approach.
- 2 A new WWTF may be needed due to revised permit limits. The schedule for this new facility is not known at this time. The above schedule should be reviewed/adjusted when the schedule and cost of the new WWTF is known.
- 3 All expenditures and projects indicated above are pending Town authorization through voting.
- 4 Reassessment of affordability and approach of the program should be performed at a minimum of every 2-years and during critical milestones such as pilot area implementation, WWTF upgrade, and main pumping station improvements.
- 5 Budgetary project costs are present day and have not been escalated for the time value of money.
- 6 Jady Hill Project costs includes sewer related expenses only.
- 7 Sewer Collection CIP is a draft plan only.
- 8 Assumes enforcement only in Westside Drive.
- 9 Schedule is based on US Environmental Protection Agency (EPA) draft Administrative Compliance Order (ACO).