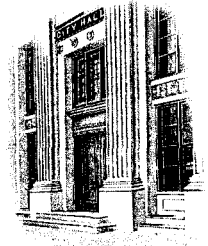




City of Quincy, Massachusetts
City Hall

OFFICE OF THE MAYOR



JAMES A. SHEETS

June 15, 1992.

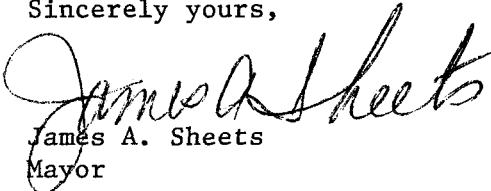
The Honorable Joseph Moakley
World Trade Center, Suite 220
Boston, MA 02210

Dear Sir:

Please find enclosed a copy of a letter I have directed to the National Marine Fisheries Service relative to the Boston Harbor cleanup and the new extended outfall. The letter gives NMFS some historic perspective, outlines Quincy's position and asks that they look at the entirety of the situation.

The residents and the City of Quincy appreciate your concern and efforts in affecting the cleanup of Quincy Bay and surrounding waters. Any assistance you may lend to our effort to end, once and for all, near shore discharges of sewage would be welcomed by a grateful community.

Sincerely yours,


James A. Sheets
Mayor

JAS/dh
enclosure



City of Quincy, Massachusetts
City Hall

OFFICE OF THE MAYOR



JAMES A. SHEETS

June 15, 1992

Mr. Thomas Bigford
Habitat Branch
National Marine Fisheries Service
1 Blackburn Drive
Gloucester, MA 01930

Dear Mr. Bigford:

The City and residents of Quincy and users of Quincy Bay, Hingham Bay, tributary waters and shorelines have serious and substantial concerns about the proposals to delay or prevent use of the new extended outfall system now under construction by the MWRA. The determinations of the National Marine Fisheries Service pursuant to the Endangered Species Act are pivotal to determining whether Quincy's concerns are realized or abated.

This letter sets forth in detail the historic and continuing problems, inherited by the MWRA, associated with the Nut Island Wastewater Treatment Plant and in Quincy Bay, which the MWRA program and the Federal Court schedule address. It explains what the public legitimately expects and demands of that program; and why the STOP proposals would frustrate those expectations, result in continuation of environmental insults, and public health risks, and waste huge amounts of ratepayers monies.

I believe the outfall location and design are appropriate, and that the studies to date, the available data, and present projections all demonstrate program for wastewater conveyance and treatment, for effluent transport and discharge, and for residuals management.

Furthermore, I believe that program has been shown, with considerable confidence, to be fully protective of marine resources including endangered species. However, it would be unsound and unwise to fail to adequately further address in a competent manner the questions of uncertainty, particularly concerning nutrient releases and possible resultant biomass perturbation. If further study and resultant consensus of scientific opinion supported a conclusion of real threat to an endangered specie, then of course appropriate corrective action is required. However, the MWRA program, the health of Quincy Bay and Boston Harbor and those who use those resources, and the ratepayer pocketbook must not be at risk because of continued **unsupported** and **hypothetical** allegations of marginal future damages. To claim uncertainty, to then weave daisy chains of assumptions and of possible consequences which might follow from that uncertainty, and on that lack of foundation to demand program revisions having major consequences and costs, is irresponsible.

Regardless of their merit, the expressed concerns and challenges must be effectively addressed, scientifically, legally and politically. Therefore, Quincy generally supports the MWRA position and program as most recently articulated by the Executive Director Mr. MacDonald. I call for a thorough and rigorous outside scientific evaluation and affirmation of the program objectives, procedures and schedule and budget. What has to be done must be done and done well; anything unnecessary or irrelevant is to be avoided. The program appears to be developing as a cooperative effort of the MWRA and State and Federal agencies with responsibilities, concerns, and expertise. This approach is most desirable, and those agencies should also contribute significant funding since many entities in addition to the MWRA affect Mass Bay and will be affected by decisions reached. I believe that the National Marine Fisheries Service ought to be an active participant in this effort.

The Quincy Bay communities and the Bay have been impacted by wastewater discharged from the Southern Sewer System since the High Level Seewer was built near the turn of the century. For over fifty of those years, raw and usually spetic sewage was discharged, untreated into water depths not over 35 feet at a point about a mile from Nut Island and within a quarter-mile of Peddocks Island. (These gravity outfalls were constructed in 1904, and terminated in single, multiport diffusers.) It was even earlier that the Calf Pasture Pump Station began discharging the raw sewage collected in the Boston Main Drain to holding tanks on Moon Island, where the waste was released at shoreline. That discharge continues, albiet rarely, to this day (May 15-17, 1992, most recently). The two original Nut Island outfalls were later supplemented by shorter outfalls (200 and 400 feet offshore!) without diffusers, to provide more capacity at higher tidal stages and compensate for incrustation in the original outfall pipes.

In 1952, the Nut Island WWTP went on line, a primary plant of 135 MGD design capacity and 280 MGD peak hydraulic capacity, serving a trunk sewer (the High Level Sewer) having a hydraulic capacity of 310 MGD (as constrained by the NIWWTP back pressure). Sludge digestion was incorporated, with digested sludge pumped on outgoing tides to a point near Nix's Mate, east of Long Island and across the President Roads Channel from Deer Island. This plant, located within a few hundred feet of the dense residential neighborhood of Houghs Necks, has caused a community odor nuisance from the outset as a result of open channel flow, aeration of grit channels, and, as the facility deteriorated, from leakage of digester gas. Electric power was provided by digester-gas-fueled diesel engine generators, a source of noise, soot and odor. As both the physical plant and staff performance deteriorated and flow from the High Level Sewer increased, plant performance and the frequency of bypasses increased, leading finally to the 1982 suit against the MDC by Quincy. Since then the MDC and later and MWRA have devoted a lot of money, care and attention toward interim restoration of the facility and upgrading of its staff. This program has been about as effective as could be expected, but treatment performance is still marginal, odors are still a problem and the 2000' outfall is in daily use and bypasses of the treatment plant still threaten.

The Boston Harbor Project will replace the Nut Island Wastewater Treatment Plant in 1995 with a headworks from which all South System flows will be transported by the Inter-Island Tunnel (now under construction) to Deer Island for treatment. This signal event takes place in 1995 (Sludge discharges has already ceased.) The Nut Island outfalls will be on standby, available only in the event of prolonged outage of the South System Pump Station on Deer Island. The treatment plant will be decommissioned and demolished, to be replaced by a passive-use park.

The four more years of construction and demolition will be a substantial trial to the neighborhood, but the long term benefits will be enormous. Water quality will no longer be affected, chlorine toxicity will cease, bottom deposits will stabilize and begin the healing process. The threats to public health from contaminated seafoods and bathing water attributable to South System discharges will end, some immediately, some gradually. Odor and noise problems should be eliminated, and the creation of an attractive park will be some compensation for the many decades of abuse suffered by the neighbors.

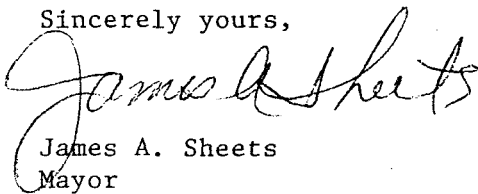
At the same time, the new outfall must be in service, accepting the effluent of the new primary works on Deer Island which will treat the total MWRA flows. Discharge to the present Deer Island outfalls will cease, further improving Quincy Bay water quality and that of Boston Harbor. The U.S. Attorney's response to the Authority's May 15, 1992 Compliance Report to Judge Mazzone correctly advises that we keep in mind that which is known. The most important thing that is known is that the "...effluent discharged from the new outfall (both before and after secondary treatments comes on line) will be a great deal cleaner than what spills into the harbor now....".

There cannot be, there **must** not be any turning back from or dealy of this program. The new outfall is key. Without it, South System flows cannot be reliably discharged from the new Deer Island facilities. Without it, the Nut Island plant and its outfalls must remain in service. Without the outfall, massive MWRA ratepayer investment in facilities will be unusable. Without it, water quality standards and associated benefits around both Deer and Nut Islands cannot be attained. Without the outfall environmental insults and public health risks will remain while huge amounts of ratepayer monies are wasted.

I ask that the NMFS discharge its responsibilities in a manner which takes into account impacts to Quincy Bay and Boston Harbor as well as potential impacts to Massachusetts Bay.

Thank you for your kind attention and concern.

Sincerely yours,



James A. Sheets
Mayor

JAS/dh

cc: Senator Edward Kennedy
Senator John F. Kerry
Congressman Brian J. Donnelly
Congressman Gerry Studds
Congressman Joseph Moakley
Senator William Bulger
Senator Robert Durand
Senator Paul Harold
Representative Charles Flaherty
Representative Steven V. Angelo
Representative Michael Morrissey
Representative Ronald Mariano
Representative A. Stephen Tobin
Representative Suzanne Bump
Joseph MacRitchie, Esq.
Douglas MacDonald, MWRA Director
Julie Belaga, EPA Region One
Peter Koff, Esq.
David Standley
David A. Colton
Susan Redlich