



Understanding NEIWPCC's Role in the Massachusetts Title 5 Program



Welcome!



NEIWPCC knows that local Boards of Health wear many hats and the Massachusetts Title 5 program is just one of many complex responsibilities you manage on behalf of your communities.

The purpose of this document is to clarify how the Massachusetts Title 5 program is structured and, more specifically, to explain NEIWPCC's role within that structure.

Our intention is that you will have a clear understanding of the roles of local Boards of Health, NEIWPCC and the Massachusetts Department of Environmental Protection within the Title 5 program.

We want to help you understand the chain of command and see how information flows between agencies. We want you to know who to contact for the most common Title 5-related questions and how certification works.



Overview

Massachusetts Title 5 is the statewide regulation that governs on-site wastewater systems to protect public health and environmental quality. MassDEP establishes the regulatory framework, local Boards of Health implement and enforce the regulation locally, and NEIWPCC administers the certification, training, and recordkeeping components of the program.

Key Players



Local Boards of Health

Local Boards of Health are responsible for implementing and enforcing the Massachusetts Title 5 program at the local level. They oversee permitting, inspections, and compliance for on-site wastewater systems and serve as the primary point of contact for Title 5 matters within their communities.



- **Enforcement**
- **Permitting and Approvals**
- **Local Oversight**

MassDEP



MassDEP establishes the Title 5 regulatory framework, provides policy guidance and interpretation, and serves as the final authority on regulatory questions, variances, and appeals. Local Boards of Health enforce the regulation, while MassDEP ensures statewide consistency.

- **Regulatory Interpretation**
- **Enforcement Questions**
- **Variances or Policy Determinations**
- **Appeals or Compliance Disputes**

NEIWPCCC

NEIWPCCC does not:

- Interpret Regulations
- Make Enforcement Decisions
- Grant Variances



NEIWPCCC administers the certification, training, and recordkeeping components of the Title 5 program. While it does not enforce regulations, NEIWPCCC provides technical support and program administration to help Boards of Health and MassDEP operate effectively.

- **Title 5 Certification and Renewals**
- **Training Approval and Tracking**
- **Database Management**
- **Customer Service and Assistance**

Chain of Command

Follow this chain of command when these questions or issues come up:



- Site-specific approvals
- Local enforcement actions
- Permitting decisions



- Regulatory interpretation
- Enforcement questions
- Variances or policy determinations
- Appeals or compliance disputes



- Certification status questions
- Renewal deadlines
- Training credit questions
- Lost certificates or records
- Title 5 credentialing issues

Support



How NEIWPCC supports Boards of Health



NEIWPCC helps Boards of Health by providing administrative, technical, and informational support for the Massachusetts Title 5 program.

- **Certification and Training Administration** – NEIWPCC manages the professional certification and renewal process so BOHs have confidence in the credentials of septic system professionals.
- **Technical Assistance** – NEIWPCC staff answer questions related to Title 5 certifications, training, and recordkeeping, helping BOHs resolve issues quickly without needing to navigate multiple agencies.
- **Recordkeeping and Reporting** – We maintain centralized databases of certified professionals, training completions, and renewals, providing accurate information that BOHs can rely on.
- **Program Guidance** – While we do not interpret regulations, NEIWPCC provides guidance on program procedures and administrative processes, helping BOHs follow consistent practices across the state.
- **Resource Coordination** – NEIWPCC connects BOHs with MassDEP when more specialized assistance is needed.

Best Practices



To help NEIWPC and MassDEP respond quickly and efficiently, Boards of Health can follow these simple best practices.

Be Specific About Your Question

- Include the type of inquiry: certification, training, records, enforcement, or regulatory interpretation.
- Provide key details: professional name, certificate number, property address, or course title.

Provide Complete Information Up Front

- Attach forms, permits, inspection reports, or relevant documentation.
- Clear and complete information reduces back-and-forth emails and phone calls.

Know Who to Contact First

- NEIWPC: Certification, training, recordkeeping, and general Title 5 program questions.
- MassDEP: Regulatory interpretation, variances, appeals, and complex compliance questions.
- Local BOH colleagues: Local permitting and site-specific matters.

Use the “Chain of Command”

- Contact the right agency first to avoid unnecessary delays.
- If NEIWPC or MassDEP needs to loop in another office, having the correct info makes this faster.

Track Your Request

- Note the date, contact person, and summary of your question.
- Follow up politely if a response is delayed—having all the details ready makes follow-up faster.

Leverage Available Resources

- Check NEIWPC and MassDEP websites for FAQs, forms, and guidance before contacting staff.
- Use the “Who to Contact” sheets you’ll receive at the end of this presentation.

Key Takeaways



Know the Roles:

- Local Boards of Health enforce and implement Title 5 locally.
- MassDEP sets the regulations and provides policy guidance.
- NEIWPCC administers certification, training, and program records.

Follow the Chain of Command:

- Contact NEIWPCC for certification and training questions.
- Contact MassDEP for regulatory interpretation, variances, and appeals.
- Local BOHs handle permitting, inspections, and enforcement.

Provide Complete Information:

- Specific details, documentation, and context help agencies respond quickly and accurately.

Use Resources:

- NEIWPCC and MassDEP websites, FAQs, and your “Who to Contact” cheat sheet can save time.

Partnership is Key:

- Clear communication and collaboration among BOHs, NEIWPCC, and MassDEP make the Title 5 program more effective and protect public health and the environment.



Who To Contact



Michelle Jenkins
Mass Title 5 Program Manager
978-349-2516
mjenkins@neiwppcc.org

Kat Arnold
Mass Title 5 Admin Assistant
978-323-7929
karnold@neiwppcc.org

Christina Stringer
Wastewater Division Director
978-349-2513
cstringer@neiwppcc.org

NEIWPCC Expertise

1. Certification and Credential Questions
 - Confirming the status of a professional's Title 5 certification or renewal
 - Verifying whether a professional met the required training contact hours for past renewal
 - Lost, misplaced, or replacement certificates
2. Training and Continuing Education
 - Questions about approved courses and workshops
 - Approving or tracking lists of training contact hours (TCHs) for certified professionals
 - Understanding training requirements for new or renewing certifications
3. Program Records and Documentation
 - Accessing centralized databases of certified professionals
 - Requesting official verification for reports or compliance purposes
 - Checking historical records of certifications
4. Technical Assistance Related to Program Administration
 - Clarifying procedural questions about certification renewals or course approvals
 - Guidance on how to submit forms, documentation, or TCH requests
5. General Questions About the Title 5 Program
 - Clarifying program timelines or deadlines
 - Questions that don't require regulatory interpretation (those go to MassDEP)

General Inquiries: title5@neiwppcc.org

Who To Contact



Title 5 Program Contacts

David Boyer, Section Chief
Title 5/I-A/Groundwater Discharge/Reclaimed Water
david.boyer@mass.gov
774-239-7060

I/A PROGRAM
Harshraj (Hersh) Thakor
harshraj.thakor@mass.gov
617-447-4557

Harsha Prasad
Alternative Design Flow Approvals & Holding Tanks
harsha.prasad@mass.gov
857-378-0935

MassDEP Expertise

1. Regulatory Interpretation
 - Clarifying how specific provisions of Title 5 (310 CMR 15.000) should be applied
 - Interpreting requirements in complex or unusual situations
 - Resolving questions where the regulation is unclear or open to interpretation
2. Variances and Local Upgrade Approvals
 - Reviewing or approving requests for variances
 - Determining eligibility for alternative or innovative system approvals
 - Guidance on upgrade requirements when strict compliance is not feasible
3. Appeals and Enforcement Escalation
 - Appeals of local Board of Health decisions
 - Situations requiring state-level review or intervention
 - Enforcement cases that extend beyond local authority
4. Policy and Program Guidance
 - Updates to Title 5 regulations or policies
 - Clarification on statewide implementation expectations
 - Direction on how new guidance affects local practices
5. Environmental and Public Health Concerns
 - Issues involving sensitive environmental areas, public water supplies, or surface waters
 - Complex contamination or failure scenarios with broader impacts
 - Coordination on cases involving multiple jurisdictions or agencies

Title 5 Email Helpline
dep.title5@mass.gov

Regional Contacts
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Who To Contact

Central Region

Main Line: 508-792-7650

James Laughlin
617-939-4736
James.Laughlin@mass.gov

Northeast Region

Main Line: 978-694-3200
Wastewater Info: 978-694-3215

Claire Golden
617-977-8874
claire.golden@mass.gov

Southeast Region

Main Line: 508-792-7650

Drew Osei (Cape)
857-383-7042
andrew.osei@mass.gov

Martha Sullivan (SE Mass)
617-913-1218
martha.sullivan@mass.gov

Western Region

Main Line: 413-784-1100

Alex White
857-276-7462
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