

**MINUTES OF THE TOWN OF CHESHIRE WATER POLLUTION CONTROL  
AUTHORITY MEETING HELD AT 7:30 P.M. ON WEDNESDAY,  
OCTOBER 23, 2019 IN ROOM 207-209, TOWN HALL, 84 SOUTH MAIN STREET,  
CHESHIRE CT 06410.**

Present

John Perrotti, Chairman; Steve Carroll, Vice Chairman; Aboud Abdelghani, Tom Scannell and Zack Wellburn. Absent: Jason Beach and James Urbano  
Staff: Walter Gancarz, Town Engineer' WWTP Supt. Scott Hallier

The group Pledged Allegiance to the Flag.

Chairman Perrotti called the meeting to order at 7:31 p.m.

Chairman Perrotti read the emergency notice.

**ROLL CALL**

The clerk called the roll and a quorum was determined to be present.

Chairman Perrotti moved agenda item #1 to the Superintendent's Report agenda item.

**1. PUBLIC COMMUNICATIONS**

- a. **AECOM letter dated October 7, 2019**
- b. **DelRay letter dated October 11, 2019**

**2. APPLICATIONS**

**a. Planned Residential Infill Development Modification – 138 Highland Avenue**

John Milone, P.E. Milone & MacBroom LLC, Cheshire CT, represented the applicant. The application is for an 11-unit rental subdivision at 138 Highland Avenue. On the map, Mr. Milone pointed out the Frontier building to the south and daycare center to the north, and the subject building back from the Liberty Bank. There is approval for a plan with a small pump facility going out to the gravity sewer tying into Highland Avenue. There was a look at the size of the lateral to see if it can be reused or reconstructed across Highland Avenue. Construction has started, and there was discussion with the Hillside Village Homeowner's Association, which agreed to extension of the gravity sewer to the back. Mr. Milone pointed out the terminus of the Association's system on the map, and where the gravity sewer will be brought, extending it to the rear.

The Authority members were informed by Mr. Milone that there is a signed Memorandum of Understanding (Memo) signed by both parties to allow this connection.

It is subject to granting of a final easement by the Association Board of Directors, and WPCA approval.

Mr. Gancarz noted his memo dated June 2015, amended September 2019. There was an attempt to steer the development into a gravity option, as the WPCA does not favor ejector pumps. Since the developer could not get an easement on private property, the intent was to get gravity, which is preferred. They have gravity and it is a pretty straight forward gravity sewer.

The Authority was told by Mr. Milone that the Association was excellent to deal with, and was open and cooperative. The sewer system remains private.

According to Mr. Gancarz, the application is already approved for final design and award of capacity. This application is just a final design modification.

MOTION by Mr. Scannell; seconded by Mr. Abdelghani

MOVED that the Cheshire WPCA has reviewed the application and submittals for 138 Highland Avenue LLC/138 Highland Avenue, Cheshire CT 06410 for Final Design and Award of Capacity Approval, amended September 15, 2019. Based upon that review and based upon the recommendation of the Director of Public Works, the WPCA has determined that the application and submittals detail a sanitary sewer system which can be constructed and used for sanitary sewerage purposes in accordance with the requirements of the Cheshire sewer regulations and other applicable specifications, codes, and laws; therefore, this application for Final Design and Award of Capacity is APPROVED.

This Final Design and Award of Capacity Approval is conditioned upon the following:

1. This approval does not confer the right to connect to the sewer system which can only be gained by applying for, and obtaining approval of an Award of Capacity, and a Sanitary Sewer Connection Permit.
2. All costs connected with the proposed sewer system shall be borne by the Developer.
3. All transfers of property in the subject development shall be encumbered by written waiver by each grantee to any right to appeal any benefit assessment which the Town of Cheshire may levy on such property; however, each grantee may reserve the right of appeal regarding supplemental assessments that the Town may levy.
4. (3.10) All construction shall conform to all relevant federal, state and local laws, rules, regulations and specifications.

5. Official representatives and agents of the Town of Cheshire, including the Building Official and the Director of Public Works are authorized to enter the Property, at reasonable times, for purposes of inspections, observation, measurement, sampling and testing.
6. This Approval permits the construction of the sanitary sewerage system in installments or phases, but it requires the construction to proceed in consecutive order.
7. The proposed sanitary sewer system shall become a part of the public sanitary sewer system. The application and submittals are incorporated and made a part of this Approval.
8. This Final Design Approval, which is issued in connection with a Site Plan Application, shall be valid for a period of one (1) year from the date of Site Plan approval by the Cheshire Planning and Zoning Commission. Extensions of this Final Design Approval for additional one (1) year periods may be applied for and will be granted by WPCA, by resolution, for good cause shown if the WPCA (in its discretion) finds that substantial compliance has been made with the approved Site Plan; that is, that work on the public improvements and the sewer system has been completed or substantially completed.
9. No Zoning Permit or Building Permit shall be issued and no construction Authorized by this Approval shall commence until the Developer's Agreement Referred to below is signed by the developer and the WPCA and is filed with The Director of Public Works.
10. The applicant, or his authorized representative, shall prepare and submit to the WPCA, for approval by the Town Attorney and for execution by the WPCA and the developer, a "Developer's Agreement" which sets forth all the conditions of this Approval.
11. Additional conditions required by the WPCA and outlined in the 9/15/19 memo from Town Engineer, Walter Gancarz, P.E.

VOTE            The motion passed unanimously by those present.

**b.     FIP Realty Corporation 75,000 S.F. Medical Building**

Peter Autunno represented FIP Corporation for the feasibility application. FIP developed the industrial park in the 1970's and 1980's, and the subject lot is the last lot on the Industrial Park. The proposal is to build a 75,000 S.F. building, and the applicant is requesting feasibility approval to connect to the original sanitary system, which was designed when the park was built. Mr. Autunno advised that all easements

are in place, and the maps show the location of the sanitary pipe to the existing manhole.

Mr. Gancarz cited his October 15, 2019 memo on the subject application. The most pertinent part for feasibility approval is that the Facilities Plan shows the subject area to be sewered and conservation development. With the original FIP development, this property was envisioned as being sewered at some future point. The capacity flow (anticipated at 13,000 gpd) is consistent with what is expected from this area. The subject property is at the corner of Marion Road and West Johnson Avenue.

Regarding the proposed building, Mr. Carroll asked for clarification that it will be an office building, no manufacturing, will be leased office space, with no food facilities.

Mr. Autunno confirmed that Mr. Carroll was correct.

MOTION by Mr. Scannell; seconded by Mr. Carroll.

MOVED that the Cheshire WPCA has reviewed the application and submittals of **FIP Realty Corporation, 759 West Johnson Avenue, Cheshire CT 06410**, for Feasibility Approval for Extension of Public Sanitary Sewers. Based upon that review and based upon the recommendation of the Director of Public Works, the WPCA has determined that the application and submittals detail a sanitary sewer system which is generally capable of construction and which is capable of being connected to the Town of Cheshire public sanitary sewer system; therefore, the application is APPROVED, with the following conditions:

(12.2.B) This approval is preliminary and does not constitute conclusive nor final approval. The right to connect to the sewer system can only be gained by applying for, and obtaining approval of, Final Design Approval, and Award of Capacity, and a Sanitary Sewer Connection Permit.

1. All costs connected with the proposed sewer system shall be borne by the developer.
2. All transfers of property in the subject development shall be encumbered by written waiver by each grantee to any right to appeal any benefit assessment which the Town of Cheshire may levy on such property; however, each grantee may reserve the right of appeal regarding supplemental assessments that the Town may levy.
3. The application and submittals are incorporated and made a part of this Approval.
4. The proposed sanitary sewer system shall become a part of the public sanitary

*sewer system except for that part which is to be retained in private ownership which is described on the application plans entitled*

5. *The Application for Final Design/Award of Capacity shall incorporate the comments listed in the memo from the Town Engineer, Walter Gancarz, dated October 15, 2019.*

VOTE           The motion passed unanimously by those present.

### **3. PROJECTS**

- a. **AECOM invoice #2000274028 dated October 14, 2019 in the amount of \$2,833.08 for West Johnson Pump Station.**

MOTION by Mr. Scannell; seconded by Mr. Carroll.

MOVED that the WPCA pay AECOM invoice #2000274028 dated October 14, 2019 in the amount of \$2,822.08 for West Johnson Pump Station.

#### Discussion

Mr. Gancarz has reviewed this invoice and recommends it for payment. He reported that is an account balance of \$10,847.

Mr. Gancarz updated the Authority members by reading a response from Jon Pearson (AECOM) dated October 15, 2019 into the record.

VOTE           The motion passed unanimously by those present.

### **4. SUPERINTENDENT'S REPORT**

- a. **Status of Plant Operations**

- i. **Nitrogen Removal**

Supt. Hallier gave an update on the nitrogen removal process at the treatment plant. He advised that the plant is running efficiently; numbers are excellent and below past numbers; and last year the numbers were higher due to weather situations. This year, to date, the discharge number is 946lbs. There is no limit to meet for nitrogen removal, and it is called a "share". Mr. Hallier explained the State of Connecticut has a permit with the federal government to remove nitrogen; it is divided amongst the 79 plants in the State for their share to be removed; it is not a permit limit; there is no fine if the limit is not met; it is a monetary issue; if the plant's share is not removed the town pays credits. He noted it also costs the town money to remove nitrogen. The discharge

number for this year (through September) is 946lbs, and we do not know how much nitrogen is removed, only how much is being discharged. The discharge is affected by cold weather, cold rains, and other weather conditions. Last year almost all of the plants had a problem discharging nitrogen, and this caused the increase in credits. For this year, Cheshire should be under its share, get monetary credits or break even.

According to Mr. Hallier, there are different things to be done to increase nitrogen removal, but it also affects other things in the plant, i.e. extra methanol affects the POD. Right now, the system is running efficiently. The plant is getting good numbers; and historically the plan has been under. In 2017 Cheshire got \$4,000 from the State for being under the limit.

Mr. Gancarz pointed out that in 2017, Cheshire got a \$4,000 credit payment, and in 2018 the town paid \$53,000. In his spread sheet analysis, Mr. Gancarz came up with larger numbers, taking the numbers from Supt. Hallier. He comes up with 1330lbs, which will have a higher impact, and would like to believe Cheshire will get a credit or be at zero. In reading the numbers, Mr. Gancarz said we are on track of having to pay.

Supt. Hallier said the spread sheet leaves five things out; you cannot use the average daily flows for the month; the plant tests weekly and it is the flow at the time of the test that amounts to the flow used to calculate the nitrogen. In January 2019, the average flow at the time of the test was 4.4mg. The numbers of nitrogen are calculated in pounds not gallons; the higher the flow, the higher the load; there are weekly flows taken at the time of the test, and there are different types of nitrogen. Rain and temperatures are taken into account. The reports, done by the lab, are sent to the State.

Chairman Perrotti requested Supt. Hallier to provide the Authority with these lab reports in a spread sheet format, and weekly reports to the WPCA. Supt. Hallier said this can be done.

Mr. Carroll said the WPCA will be okay having this information. He commented on the town going from a small credit to a large debt, and not wanting to keep on that projectory. The Authority needs to address this on a month to month basis, so there are no surprises.

In that regard, Mr. Perrotti said the Authority wants to insure that when the system is running, and something not running well, that there is a plan or exterior help and resources to insure the plant is running at the right levels.

This statement was reiterated by Mr. Carroll. He said the Authority members are trying to do everything to help Supt. Hallier. The members want to know if something is lacking, issues on staffing levels, and assisting to address them.

The Authority is trying to get the data. Chairman Perrotti told Supt. Hallier that questions/comments/interrogatories are not made to question his capability, but to help the members understand, and have all the information required to make the correct decisions. Without the right information, it is dangerous. The information is needed to support Supt. Hallier in the areas, from a priority perspective, are the best bang for our buck.

In response, Supt. Hallier said if he needs help, he will ask for it. He stated that the plant is running well and the system is running well.

Chairman Perrotti reiterated his request for Supt. Hallier to give the Authority a spread sheet on the nitrogen removal in the same reporting method used for the State report, with a running total.

The Authority was informed by Mr. Gancarz that plants in surrounding towns (Meriden, Southington) received substantial credits last year. He agreed that the running total (by monthly sheets) should be given to the Authority.

Supt. Hallier made the point that we will not always get where we want to be, at that zero. The loading and flow must be taken into account.

It was stated by Mr. Gancarz that the Authority is looking for whatever credit or assessment given by the State at the end of the year, which will be on total poundage. This is average pounds per day.

This can be trended on a weekly basis and Mr. Perrotti said it will show the number creeping up or down, depending on weather and flows. The Authority will understand this information.

Mr. Carroll said this can be presented in simplified form for the WPCA to understand, i.e. trends 2017-2019, the measurement, numbers, average weekly and cumulative numbers year to date. The Authority is looking for the score card for the year for comparison to past performance, and wants to see flows week by week and the trend lines going up or down.

With this information, Mr. Abdelghani said it will make the Authority members understand how the Superintendent got to the numbers along with backup data.

Chairman Perrotti summarized that Supt. Hallier will provide the Authority with more data and information to provide feedback to him.

The process was explained by Supt. Hallier. Four (4) samples are taken per month for the total nitrogen. This information is on the forms submitted to the State. The testing

is done at the same time of day every week. Every month the average daily pounds are added up, and this is what the State looks at.

Nitrogen Removal History Report January to August 2019 – Supt. Hallier advised that the total 946 pounds also includes the September numbers.

Mr. Gancarz cited the average pounds for April at 112, and he entered this on his spread sheet. February – average daily pounds 214.25. Through August he has a total of 1,330 pounds total.

The numbers were clarified by Supt. Hallier.

January – 215.4; February -214.25; March – 107; April – 112; May – 147.8; June – 61.75; July – 29; August – 34.2; September – 23.75.

The total 946 lbs. includes September.

Supt. Hallier noted that in January 2017 the total was 57.50lbs; January 2019 the total was 215.4lbs; the average flow for the four weeks in January 2017 was about 2 million gallons; the average flow for January 2019 was 4.5 million pounds. We all want to be at the 2017 numbers, but cannot control the flow that comes into the plant. This is where the increases will be...it has nothing to do with the efficiency of the nitrogen system and how it is being run. It has to do with the flows and concentrations and the weather...and there are many variables and things which cannot be controlled. Everything is running well.

## **ii. West Johnson Pump Station Issue**

Chairman Perrotti commented on the letters in the packet, one from AECOM and one from DelRay, and a second letter with an updated rebuttal from Jon Pearson (AECOM).

Mr. Carroll asked for an update on the cleanup, problems, corrections made and by whom.

Supt. Hallier advised that the current status is everything is corrected.

A summary was provided by Chairman Perrotti. There was a failure of a ½ inch nipple; a piece came off; it caused the breach of raw sewage (which is under pressure) that started shooting out. We then had a pump station with sewage coming into it. The pump station has a wet and dry well; the dry well started filling up; the dry well should be dry; there is a sump pump in the dry well which is meant for cleaning, wash down, and runs automatically. There was then reliance on a not constant duty pump to try to remove the sewage coming out...by a dry well sump pump trying to remove it. In the wet well the normal pumps are taking the waste down the street. There are alarms in the system to notify of a problem occurring; there are a variety of high level alarms; the

dry well has a simple alarm if it fails; there is an alarm at Operator Interface Panel (OIT) inside the station. The problem was not found until the regular physical inspection, and at that point, everything went into recovery and repair process. AECOM was notified, and they sent a note to DelRay.

Mr. Perrotti said the Authority wants to understand the process of what happened; what were the means to rectify the situation; help understand prevention and reoccurrence in the future; understand the process for all the pump stations to review alarm situations, communications back to the main plant, personnel/staffing etc.

The question about the alarm on Thursday, 3:38 p.m. was raised by Mr. Gancarz, and when it made it out. It talks about 3 ½ hours later, after that.

Supt. Hallier reported the problem was found on Friday morning, about 11 a.m. from the visual inspection.

Mr. Perrotti said the alarms never left the HMI Skater in the pump station.

In that regard, Mr. Wellburn said that alarm is only local; there is no interface to say there is a fault; and there is nothing to send out saying there is a problem.

The Authority was told by Supt. Hallier that the alarms are supposed to be bundled, and there are more alarms than channels. Somewhere there was a miscommunication; the alarm did not get bundled to travel out to Channel 3; there was miscommunication between the engineer, contractor and Superintendent as to where it was supposed to go, what was supposed to land where, and never got tied into the common alarm to dial out. Everything is now tested and working, coming into the operator interface.

Chairman Perrotti said some alarms do and some don't, and there is not enough capability to individually address all the different pump combinations of alarms. What should have happened is all the alarms, where instant examination needs to take place, should have been bundled and were not.

This is correct and Supt. Hallier said the flooding would still occur, but not as bad as it was. There was clean-up, everything was pumped out, DelRay replaced parts and pressure washed everything. Staff worked with DelRay, and now everything has been replaced, the pump station is up and running, and staff is working with DelRay and Aaron Associates to insure pumps are bundled. The flooding was contained in the wet well; it was about 8 feet deep; there will be weekly testing and on a monthly basis. Mr. Hallier is working on addressing communication issues, and trying to find the cause of the original problem.

The Authority was told by Mr. Perrotti that there is a corrective action plan to address all the alarms and combinations sent back to the main plant for immediate response.

Supt. Hallier reported that he and two (2) people are on call all the time, 24/7, for response to a problem. The other pump stations have been validated. The root cause of the failure was reviewed by a professional, and Mr. Hallier said it seems that the Impeller is working out of its range. The range now is between 200 and 850 gallons per minutes, and this is a large range for one Impeller. This will be brought down to 225 gallons per minutes to reduce the working range. Mr. Hallier said the guess is cavitations from the pump caused fatigue with the stainless steel nipple.

If this is fixed so there is gain of the alarms into one call, a general alarm, Mr. Wellburn asked if it is feasible to have an indicator light on the building that flashes.

Supt. Hallier said we do not want this, as the general public is curious and there could be issues with calls.

The pump stations were designed by AECOM.

Mr. Gancarz said AECOM has a good track record with pump station design.

There are different types of pumps used, and Supt. Hallier said it is a simple fix...just trim the Impeller. DelRay did the pressure washing; WWTP staff did clean-up. Regarding costs with DelRay, this has not been discussed or determined. A note with conclusions will be sent out, and he is working with Jon Pearson on this. Staff waits to hear back from DelRay.

Mr. Scannell asked if there was original incorrect specs.

Stating no, Supt. Hallier said it was a field situation. The pumps perform as specified to perform, when testing was done. No one anticipated the operating range to have an effect on vibration. The nipples are stainless steel and softer.

It was stated by Mr. Gancarz that there must be assurance all the other pump stations are operating properly.

In that regard, Supt. Hallier said there is physical inspections twice a week, Tuesdays and Fridays, depending on personnel. A check list is completed, and it takes most of the day to do the nine (9) pump stations.

### **iii. Synargo – Sludge Disposal**

Mr. Scannell talked about the City of Waterbury's large problems and Cheshire following the problems with Synargo, as it is an environmental issue concern. He noted that Cheshire takes its sludge to Waterbury, and the city's problem is the odor, and spending \$100,000 or more on the problem. It could be that Synargo (Waterbury) is taking too much sludge from other towns...and Mr. Scannell questioned Cheshire's alternative on handling Synargo going out of business.

According to Supt. Hallier there is another incinerator in Naugatuck CT, and Cheshire would have to contract to go there. If Synargo goes bankrupt, Cheshire would have to scramble for another site.

On behalf of the Authority, Mr. Scannell has been following the news and articles on the Synagro, Waterbury CT issues.

To date, the Synagro plant issues have not been resolved and Mr. Scannell said the entire area has an odor (miles and miles) which cannot be controlled. With 79 treatment plants in Connecticut, he said Cheshire should be aware of what is happening in other plants. Mr. Scannell questioned if there is communication amongst the plant Superintendents in looking at these types of issues. He stated the entire City of Waterbury is concerned about this problem.

Supt. Hallier said if something unusual were to happen, there are calls to the plants to inform the staff of the situation. There is the organization, CWPA, and its newsletter for interaction among plants. He informed the Authority the Waterbury plant has had issues in the past, and West Haven has been trying to fix odors for the past 30 years.

Chairman Perrotti noted that Cheshire has no backup plan for waste disposal.

If the situation with Synagro escalates and it shuts down, Mr. Gancarz stated we should know of an alternate plan for Cheshire, and think about a contingency plan.

Supt. Hallier explained that if Synagro cannot burn at the incinerator, they are obligated to take the waste by dumpster to another site. There is one (1) more year with the Synagro contract.

When getting close to the contract renewal, Mr. Perrotti said the process should start earlier, and this is an operational issue.

#### **iv. Staffing**

The Authority was informed by Supt. Hallier that staffing is doing well, with some tight days due to vacations. Everything is managing well; everyone has stepped up; and there is still indecision on whether to add back the lost position, create a new position or shift personnel around. He noted the plant requires lots of maintenance.

With the new plant, Mr. Perrotti asked about looking at training some of the maintenance staff in areas of technology to forecast when equipment is going into a failure mode. This would stay ahead of maintenance issues and/or problems.

There was a brief discussion on the Skater System and it being on track. With channels in the system, Mr. Perrotti said there can be devices to monitor the system and track the data.

Mr. Carroll commented on wanting to hear the Superintendent not having to short cut any routine maintenance jobs due to lack of manpower.

**5. TOWN ENGINEER'S REPORT – no report.**

**6. NEW BUSINESS**

**a. Information – Sewer Use Adoption Schedule**

Current Rate - \$415 residential; commercial rate is based on water usage; CCI rate is based on flow meter information.

In prior years, Mr. Perrotti noted the flows for commercial and residential were evaluated to insure parity is maintained.

For 2020 the break even sewer usage rate is \$418.76.

Mr. Gancarz reviewed the rate information with the Authority.

- \$415 is the 2019 rate – 4,917 single family homes; \$2,040,555.00 revenue.
- Senior Cap based on income; average rate of \$350 per home; \$49,000 revenue
- Commercial - \$4.13 per 100 C.F. (RWA water data); \$776,281.66; if a commercial user generates less than a single family home, the flat rate of \$415 is charged.
- CCI – the charge is off the flow meter – December 1, 2018 to November 30, 2019; 9 months of data is taken, and September/October/November 2018 numbers are plugged in for full year data; \$985,363.89 revenue.
- Total estimated revenue - \$3,850,260.65
- Projected Revenue Town Council budget - \$3,884,975.00
- Shortfall of about \$34,000

The proposed annual rate information at \$420 and \$425 was reviewed by Mr. Gancarz.

\$420 annual rate – generates revenue of \$3,896,413; shortfall of \$12,000.

\$425 annual rate – generates revenue of \$3,942,565.

Total WPCD budget - \$4,429,832.

Break Even rate - \$418.76.

Most of the WPCD revenue is generated from sewer use fees, and there are some connection fees. Last year, the CCI flow was lower than projected, and this year CCI is running similar to last year.

The Authority members agreed on a sewer use rate for 2020 not to exceed \$425.

**b. Propose maximum sewer rate to be used for Public Hearing**

The Authority members agreed on a sewer use rate for 2020 not to exceed \$425, which would be a 2.4% increase over the current rate. WPCA will discuss the proposed rate at the public hearing.

**c. Set Public Hearing schedule and approve Legal Notice.**

The Authority set the Public Hearing for Wednesday, November 20, 2019, at 7:00 P.M. in Council Chambers. The regular meeting of the WPCA will be held immediately following the public hearing.

MOTION by Mr. Scannell; seconded by Mr. Carroll.

MOVED that the WPCA, pursuant to Connecticut State Statutes, Chapter 103, Section #7-255 and Section 7-147, will hold a public hearing on Wednesday, November 20, 2019 at 7:00 P.M. to consider and take action on the proposed revision of the Sewer Use Charge Regulations. It is proposed that the Sewer User Charge will be established not to exceed Four Hundred and Twenty-Five Dollars, \$425.00 per annum per single family dwelling. Other users will pay an amount based on their relative water use as reported by the Regional Water Authority (RWA) or sewer meter readings in the case of Cheshire Correctional Institution (CCI), in accordance with the format outlined in the Regulations, but not less than Four Hundred and Twenty-Five Dollars \$425.00 per year.

VOTE           The motion passed unanimously by those present.

**7. OLD BUSINESS**

**8. APPROVAL OF MINUTES – Regular Meeting September 25, 2019**

MOTION by Mr. Scannell; seconded by Mr. Carroll.

MOVED that the WPCA approve the minutes of the Regular Meeting of September 25, 2019, subject to corrections, additions, deletions.

VOTE           The motion passed unanimously by those present.

**9.     ADJOURNMENT**

MOTION by Mr. Scannell; seconded by Mr. Carroll.

MOVED to adjourn the meeting at 9:07 p.m.

VOTE           The motion passed unanimously by those present.

Attest:

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Marilyn W. Milton, Clerk