



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

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Issued Electronically

March 1, 2023

Mr. James Mercer
Housatonic Water Works Company
80 Maple Street
Great Barrington, MA 01230

Re: Great Barrington
Housatonic Water Works Company
PWS ID# 1113003
Enf. Doc Number: 00013199
Enforcement

Dear Mr. Mercer,

The Massachusetts Department of Environmental Protection (MassDEP or the Department) is in receipt of the Housatonic Water Company's (the Company) February 1, 2023 engineering report, prepared on its behalf by Northeast Water Solutions, Inc and Water Compliance Solutions, LLC, and submitted in accordance with requirements included within an October 4, 2022 Administrative Consent Order (ACO) (#00013199). The Engineering Report was a requirement of prior enforcement and compliance correspondence but was not submitted until after issuance of the ACO.

The report, titled *Evaluation of the Formation and Control of Disinfection Byproducts at the Housatonic Water Works Company*, describes the Company's identified causes of its recent disinfection byproducts (DBP) violations and includes an alternatives analysis for addressing those violations. Within the Report, the Company identifies the use of two-stage chlorine disinfection or the installation of granular activated carbon (GAC20) as alternative treatment modifications to be implemented to return the Company to compliance. Within this letter, MassDEP will address the two-stage disinfection alternative only. A separate correspondence will address in greater detail the potential installation of GAC20 and the alternatives analysis.

The Company presents the use of two-stage disinfection as its preferred alternative which could be accomplished relatively quickly in 2023, and with minor modification to the existing treatment system. Through this DBP control strategy, the existing application of chlorine prior to the chlorine contact chamber would be reduced and a second dose following the water storage tank would be added. This approach would decrease the rate of DBP formation in the contact chamber and storage tank, while maintaining compliance with the disinfection requirements of the Surface Water Treatment Rule and continuing to prevent the detection of coliform bacteria within the distribution system.

MassDEP finds the evaluation of the two-stage disinfection alternative included within the report to be sufficient to allow the Company to proceed with its implementation as a means of controlling DBP levels.

Additional control measures may be required in addition to this action, including the installation of GAC20 or another alternative. In accordance with the scheduling allowances included within the Administrative Consent Order (see Section III, paragraph 8.B.v. of the Order), **MassDEP requires that a WS34 permit application be submitted within 60-days of the date of this correspondence, and that on-site work necessary to implement two-stage disinfection be completed within 60-days of MassDEP's permit approval.**

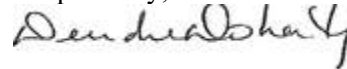
Although the permit application may incorporate language from the engineering report within its narrative, the application must incorporate requirements included within MassDEP's Chapter 6 of its *Guidelines for Public Water Systems* such as:

- The application must be signed and stamped by a Massachusetts Registered Professional Engineer and must include a schematic showing modifications to the existing treatment plant layout incorporating any new equipment and points of application.
- A description of the Chemical Safety Control Strategy for critical chemical feed systems must be included.
- Operating and control procedures including proposed application rates must be included.
- Specifications on proposed equipment must be included.
- The design must include a point-of-entry sample tap located at least 100 feet downstream from the last point of chemical injection.

MassDEP anticipates that the equipment included within this proposed treatment modification are not proprietary, and themselves are not unique to the proposed design. The Company may, therefore, begin to secure the anticipated equipment in order to expedite its installation once MassDEP's approval is received.

If you have any questions about this matter, please contact Douglas Paine by telephone at 413-755-2281 or by email at Douglas.Paine@mass.gov.

Respectfully,



Deirdre Doherty
Drinking Water / Municipal Services Chief
Bureau of Water Resources

cc: DWP Boston; OE Boston; Board of Health; DEP-WERO-D. Paine, J. Gibbs, H. Pokharel

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