



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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September 28, 2022

Issued Electronically

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

Re: Great Barrington
Housatonic Water Works Company
PWS ID# 1113003
Enforcement

Dear Mr. Mercer,

As the Housatonic Water Company (Housatonic) moves forward with its GreenSand Plus pilot sessions which are designed to evaluate GreenSand Plus for effective removal of manganese and disinfection byproduct precursor within Long Pond raw water, the matter of residual manganese within the Housatonic distribution system remains largely unaddressed.

We know that disruptions to the Housatonic distribution system as a result of water main breaks, fire suppression, and conventional flushing have the potential to dislodge residual manganese and other contaminants resulting in negative impacts to Housatonic's customers. Although annual full system flushing is a technique encouraged by MassDEP as a means of reducing the buildup of residual particles in distribution systems and assisting with the control of long-term water quality issues, care should be taken to manage impacts when necessary.

MassDEP has learned that Housatonic may conduct a more substantial system wide flushing of its distribution system as a means of eliminating residual manganese and other contaminants, and that this flushing event may occur as soon as this fall. Although this, and future routine, flushing events may be productive means of reducing residual contaminants in the distribution system, care should be taken to protect customers and to limit impacts:

- The use of general and targeted notifications to customers should occur with sufficient advance notice to allow customers time to plan for disruptions to water quality that are likely to occur.
- Flushing should occur in a structured manner, including considerations for isolating sections of the distribution system as a way of localizing impacts.
- Frequent water quality testing for total coliform bacteria, turbidity, manganese and color should occur within those sections of the system being flushed.
- Consideration should be given to providing alternate water to those most sensitive customers including the elderly and children.

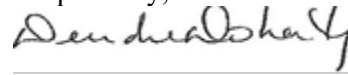
MassDEP requires Housatonic to provide notification to MassDEP at least 10-days before the start of a system wide flushing event.

The use of flushing as a routine solution to residual build-up is also critical for system maintenance, but this action, alone does not adequately address distribution maintenance. A comprehensive distribution

management plan designed to address undersized water mains, inadequate water pressure, water loss, excessive unaccounted water percentages and replacement of water mains is also necessary for long-term maintenance of the distribution system. Many of these issues were addressed within MassDEP's most recent sanitary survey inspection report and the Department will continue to revisit Housatonic's compliance with those related requirements.

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; Board of Health; DEP-WERO- H. Pokharel

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