



Department of Environmental Protection

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Mr. James Mercer, Treasurer
Housatonic Water Works
80 Maple Ave Ste 1
Great Barrington, MA 01230

September 1, 2022

Great Barrington
Housatonic Water Works
PWS ID#: 1113003
BRP WS 21B Pilot Study
Mn Treatment, Transmittal # X289054
Conditional Approval Correspondence

Dear Mr. Mercer,

The Massachusetts Department of Environmental Protection (MassDEP) issued a conditional approval of the above referenced permit application for manganese (Mn) treatment pilot study on August 1, 2022. Subsequently, MassDEP received an email with an attachment letter from Housatonic Water Works on August 17, 2022, regarding an Administrative Consent Order and requesting the following modifications listed below to the August 1, 2022 Conditional Permit Approval,

1. Condition 3 calls for the pilot study to be conducted for all four seasons. "Provide the schedule for the pilot study for all four seasons before the final inspection." HWWC has demonstrated Mn is a seasonal condition and therefore asks this provision to be revised to strike the reference to "four seasons." The HWWC has previously submitted data indicating that the manganese is a seasonal (summer) phenomena and requests that the Department consider a reduced testing schedule so the HWWC can be responsive to its customers and implement a manganese reduction prior to next summer.
2. Condition 4 states "... For example, if the maximum of 0.5 NTU turbidity is treated during the pilot study without an issue, then the approval for the construction of the full-scale operation of the Mn treatment would be set for the maximum turbidity of 0.5 NTU." HWWC asks for the quoted wording to be removed because it does not seem to appropriately follow from the first sentence of the paragraph and what that says about requirements to achieve pilot study success. The quoted sentence is also overly restrictive for full-scale use of the GreensandPlus filtration system.
3. Condition 6 states "Based on the historical data presented during the permit application, the CSMR index suggested corrosive water and this information will assist in assessing simultaneous compliance with the lead and copper rule and Safe Drinking Water Act standards." HWWC asks for the quoted wording to be removed because HWWC has data and an extensive evaluation, which it previously provided to the Department, demonstrating its water is not corrosive. See, Cornwell Engineering Group, Inc.'s October 29, 2020, Housatonic Water Works, Desktop Study – Colored Water and Corrosion Assessment, and HWWC's Lead and Copper Rule monitoring results.

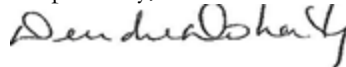
MassDEP's response to the modification request are below, respective to the line items above,

1. Condition 3 remains as year-round filtration is needed for an evaluation at surface water locations and for simultaneous compliance and permittee's mentioned expectations for Total Organic Carbon and Disinfection Byproduct impacts. The Department concurs that installation of treatment prior to the typically most challenging season (summer) is appropriate. The full-year piloting for new surface water technology is a longstanding requirement and is set forth in MassDEP's Guidance on new technology and piloting; New Product or Technology Review Policy, Policy # 89-01, and Pilot Study Requirements for Proposed Treatment, Policy #90-04. These policies and requirements were established to ensure that surface water system that are subject to significant variability in temperature and various water quality parameters achieve both the intended improvement and simultaneously comply with all other drinking water standards and requirements.
2. Condition 4 remains but is clarified to explain that the approval would be limited to the successful operational range experienced during the pilot. The pilot evaluation is limited to the conditions experienced during the pilot.
3. Condition 6 remains as a reasonable tool in assessing simultaneous compliance.

Given the fact that HWWC has not requested an inspection of its proposed pilot treatment system yet, the Department is concerned that HWW, despite its statements, is not interested in capturing the most challenging season in 2022. Please notify the Department as soon as the pilot system is ready for inspection.

If you have any questions regarding this matter, please contact Hem Pokharel at 617-455-7957 or Hem.Pokharel@Mass.Gov.

Respectfully,



Deirdre Doherty
Drinking Water/Municipal Services Chief
Western Regional Office

cc: DWP, Boston, Great Barrington Board of Health (eCopy), Hem Pokharel (eCopy); Doug Paine (eCopy)
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