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

September 30, 2022

William Brinker, Clerk
Egremont Water Department
P.O. Box 681
South Egremont, MA 01258

Re: Egremont-DWP
Egremont Water Department
PWS ID#: 1090000
Sanitary Survey

Dear Mr. Brinker,

On July 27, 2022, Douglas Paine and Kwame Duodu of the Massachusetts Department of Environmental Protection (MassDEP), Drinking Water Program (DWP) conducted a Sanitary Survey of the Egremont Water Department (Egremont or "EWD") public water system. A sanitary survey is an on-site review of the water sources, facilities, equipment, operation and maintenance of a public water system for the purpose of evaluating the system's ability to produce and distribute safe drinking water.

During the course of the survey, MassDEP identified areas in which improvements in the administration, and operation and maintenance of the system could be made. MassDEP's evaluation of the water system, and the specific required and recommended actions, were discussed during a debriefing meeting with Nathan Stalker, Egremont's primary water operator. This report contains time sensitive requirements, which are summarized in the Compliance Plan Tables. Please review the items noted in the report and Compliance Plan Table B and return the signature page to MassDEP by **October 31, 2022**. Specifically, MassDEP requires the following actions to remedy items noted in the inspection:

An assessment of this public water system's capacity was conducted by MassDEP for the last sanitary survey report, dated March 28, 2019. Based on the results of this Sanitary Survey inspection, the public water system's capacity rating remains at Conditional. Please refer to the Findings section of this report for more details on public water system capacity.

Nathan Stalker is sufficiently licensed to provide primary distribution and treatment operation services for this water system and is on-site a minimum of 6-hours per day (M-F) which meets the minimum staffing requirements as identified within a November 17, 2020 Administrative Consent Order. A System Staffing Plan, dated September 11, 2020, is on file with MassDEP. Linda Tims provided secondary treatment operator coverage, while James Olmsted and Eric Steuernagle are also appropriately licensed and available. **Should Egremont make a change in its primary or secondary water operator status, it must provide MassDEP with notification of the change within 7-days and must provide a revised System Staffing Plan within 30-days of that change. MassDEP is aware that Ms. Tims is no longer**

serving as a secondary operator. Egremont is required to comply with the provisions of 310 CMR 22.11B(3).

Prior to the construction of Egremont's water filtration treatment plant, its Karner Brook source was filtered using an in-stream passive filtration system and was treated with a chlorine-based disinfection system. Once the new filtration plant was constructed in 1999 and a new raw water pump station went into use, the old transmission main that delivered water by gravity from the reservoir through the chlorine disinfection station was valved off in several locations and abandoned in-place, along with the prior chlorine disinfection station. It is MassDEP's understanding that the old transmission main also remains connected to the current water system at several closed valve locations. The use of closed valves which will eventually fail, to prevent untreated water from entering the distribution system is insufficient protection against contamination risks**. By November 30, 2022, provide written notice that the former transmission main has been cut and capped at the reservoir, as a means of preventing untreated water entering the current water system.**

Although a full cross-connection control survey of the entire Egremont system has been previously conducted, no testable backflow prevention devices are reported to be within the water system, and the cross-connection reporting section of recent Annual Statistical Reports (ASR) includes no information. Because the water system does serve locations that would typically include uses requiring testable backflow prevention devices (at least one agricultural connection, which also reportedly includes a private well; a small school with a boiler; and several commercial connections including restaurants), **MassDEP is now requiring that all non-residential service connections within Egremont's distribution system be resurveyed for potential cross connections, and that by November 30, 2022, the results of that effort be reported to MassDEP. All future ASRs must be accurately completed.**

Egremont's source water, Karner Brook, is prone to high turbidity during storm events. Historically, Egremont's water operators have turned the raw water pumps off during a storm to prevent damage to the slow sand filters that may keep the treatment system out of service for an extended period of time. **With increased storm severity and frequency in recent years, MassDEP requires that by December 31, 2022, Egremont provide written notice the treatment plant's raw water turbidimeter has been equipped with a solenoid, or other means of automatically shutting down the raw water pumps in an event of the detection of turbidity at a pre-set level.**

The Surface Water Treatment Rule (SWTR), and the Massachusetts Drinking Water Regulations at 310 CMR 22.20A, require chlorine residual levels to be monitored daily to assure that minimum residual levels within the water entering the distribution system is always greater than 0.2 mg/l and that residual levels during peak hourly flow is sufficient to meet Egremont's disinfection contact time requirements. During the inspection, MassDEP observed that a single chlorine residual reading, generally taken in the morning, is reported as a means of demonstrating compliance with both requirements. This reported residual reading is not likely representing either the minimum for the day or the minimum during the peak hourly flow and is therefore not demonstrating compliance with either chlorine residual requirement. Historically, Egremont's chlorine residual levels are very consistent and well above the minimum of 0.2 mg/l and its reported CT values consistently and easily meet the required minimum. **Beginning with its November 2022 SWTR reporting, MassDEP requires that Egremont use its chart recorded residual levels to report the daily minimum and that the minimum during the peak hourly flow be used to calculated CT compliance.**

The Karner Brook Dam has been found to be in unsafe condition as defined by the Office of Dam Safety due primarily to severe cracking and displacement of concrete. The dam is also being undermined by Karner Brook. Loss of the Dam would be catastrophic to the continued operation of the water system.

MassDEP requires annual updates on Egremont's progress in addressing this issue, with the first progress report due by November 30, 2022.

Although Egremont has developed a Capital Improvement Plan which identifies priority projects related to treatment, distribution and source availability, it has to develop a Rate Study (also recommended within the CIP). **MassDEP requires that by June 1, 2023, Egremont provide a copy of a completed Rate Study.**

Egremont's master meter has not been calibrated in years and its possible inaccuracy may be a factor in Egremont's ongoing struggle to decrease its unaccounted water percentages to within the State's goal of 10%. **By December 31, 2022, provide written notice that the treatment plant's master meter has been calibrated or replaced.**

As part of its implementation of the revised Total Coliform Rule, MassDEP will be developing new Coliform Bacteria Sampling Plans. **A new Plan will be provided to Egremont to be signed and returned to MassDEP within 30-days of receipt and Egremont will begin sampling according to the new Plan.**

Questions regarding this document, or other drinking water issues, should be directed to Doug Paine at (413) 755-2281.

Respectfully,

Deirdre Doherty, Section Chief
Drinking Water Program
Bureau of Water Resources

Attachments: Sanitary Survey Report

cc: Board of Health – Egremont, Boston – DWP, K.Duodu MassDEP WERO, Nathan Stalker-Egremont Water

WERO File W:\BWR\WS\CCE-SS\Egremont\1090000 - Egremont Water Department\1090000 2022-07-Egremont-SS-dpaine

SANITARY SURVEY REPORT

Egremont Water Department

September 30, 2022

GENERAL DESCRIPTION

The description of the water system is updated from that reported within MassDEP's March 28, 2019 sanitary survey report.

General:

The Egremont Water Department serves approximately 1,000 customers (summer population) through 178 water services mostly along State Route 23 and 41 (Hillsdale Road, Undermountain Road, Sheffield Road, and Main Street) in the South Egremont Village. Only about 60% of the residents occupy their homes in winter, making summertime water demand much greater than winter demand. The water department is governed by a board of three water commissioners.

Formed in 1913, the utility was privately owned until it was purchased by the Town in May 1996. After the town purchased the water company from its private owner, significant upgrades to the water system were made from 1999 through 2008. These improvements included the construction of a new slow sand filter plant, water main replacement in the distribution system, and upgrades to the Karner Brook Dam.

Source:

Egremont Water Department is served by a single surface water (Karner Brook) source located adjacent to Mount Washington Road.

Karner Brook Reservoir (01S):

The headwaters of Karner Brook flow easterly out of the town of Mount Washington, along Mount Washington Road and enter Egremont along the southeast border. Karner Brook is impounded by a small concrete dam measuring approximately 30 feet long and 5-feet high. Eleven feet of the dam is at an invert elevation equal to the level of the brook. A 1-foot high flashboard is attached to the dam in summer to create a small pool of water directly over the infiltration gallery located in the stream bed of Karner Brook.

The infiltration gallery consists of lateral collection pipes in a bed of coarse gravel. The gallery measures approximately 60-feet long by 50-feet wide and is set approximately 6-feet into the bed of Karner Brook. It consists of 6 separate 6-inch vitrified clay pipes ranging in length from 25-feet to 60-feet. Each of the laterals is set at the bottom of a "filtration bed" which consists of 3/4-inch gravel, 3/8-inch gravel, 1/8-inch gravel and sand. The infiltration gallery filters out large stream debris and a small portion of raw water turbidity.

There is an upper infiltration gallery located approximately 60-feet upstream of the lower infiltration gallery. It was installed in the mid 1960's to supplement the lower infiltration gallery during low stream conditions. The upper gallery is of similar construction as the primary gallery. The upper gallery does not flow directly into the low lift chamber but rather uses a 20,000-gallon tank prior to flowing into the low lift chamber. The 20,000-gallon tank is no longer connected with the pump chamber and not used.

Alternatively, Egremont Water Department can bypass both infiltration galleries and draw water directly from an intermediate pond in the brook.

Karner Brook has a watershed area of approximately 2.1 square miles and an estimated safe yield of between 77,000 and 84,000 gallons per day.

In an emergency, EWD has the capability of connecting a water tanker to its treatment plant, or for a hydrant to hydrant connection with Great Barrington Fire District using long distance aboveground piping.

Storage:

Storage for the Egremont Water Department consists of a two-compartment clear well downstream of the slow sand filters at the water treatment plant. Each compartment of the clear well has the capacity of 100,000 gallons each and each has a single baffle to improve chlorine mixing. Water flows by gravity from the clear wells into the distribution system.

Distribution:

The Egremont Water Department distribution system consists of approximately 30,000 feet of distribution system main. The distribution system consists of long runs of water main that are not looped. The system consists of many dead-end water mains in the outlying areas.

Older sections of pipe are constructed of small diameter galvanized iron (3") or Asbestos Cement (AC). Recent water system improvements included the installation of 8-inch ductile iron pipe and directionally-drilled HDPE water lines. New service connections along the replaced mains are also constructed of HDPE.

Fire hydrants throughout the system that are painted green to indicate to fire department personnel that they are connected to water mains not sized sufficiently. There are also 25 "dry" hydrants connected to surface waters throughout the town for fire protection.

Treatment:

Treatment for the Karner Brook source is provided by a slow sand filter plant located a few hundred feet from the existing intake reservoir and dam. Constructed in 1999 and placed on line in 2000, raw water from Karner Brook is drawn into the filter plant by low lift raw water pumps adjacent to the dam. The low lift pump chamber is equipped with two 5 horsepower pumps connected to variable frequency drives. The pumps are self-priming and are located about 8 feet above the infiltration gallery intake water level. The pumps are capable of pumping 145 gallons per minute against a total dynamic head of 135 feet. Only one of the pumps operates at a time and each is automatically controlled by floats in the raw water inlet chamber at the filter plant. The operator alternates which pump will run on a weekly basis.

Once water enters the raw water inlet chamber (volume 2,000 gallons) it flows by gravity through a manifold of piping to three (3) slow sand filters. Each slow sand filter has a surface area of 500 ft^2 and consists of 36-inches of filter sand placed on top of 18-inches of support gravel. Under the support gravel is a perforated plastic piping underdrain system that collects filtered water and directs it to the clear wells. All three filters are normally in service unless taken down for maintenance.

Float switches in the inlet chamber control the raw water pumps and actuate alarms in the event of high or low water in the filters.

Individual filter control valves allow the operator to manually adjust the flow rate through each filter as needed or to remove it from service for maintenance. The depth of water over the top of the filter is maintained by the preset level in the raw water chamber referenced above. If the level of water over the filters rises to the point where it overflows, it is directed to a 4-inch overflow conduit in the raw water inlet chamber. EWD initiates filter scraping when the total head loss reaches 19-inches on the differential pressure gage. Typically only 1/2 inch of media is scraped off at a time. Once the scraping operation has been completed, the filter is filled from the bottom, then allowed to drain to waste until the ripening period is complete (approximately 2 days until the turbidity returns to acceptable levels). Each filter is equipped with a Hach 1720C in-line turbidimeter and chart recorder, viewing portal, lights and ceiling fan for ventilation.

Filtered water flows from the underdrain system through a single pipe to a filtered water control chamber. The chamber is equipped with a manually adjustable weir that is a secondary control assuring that the water over the filters never drops below the sand level during normal operations. From the filtered water control chamber, water flows through a pipe to one of the two 100,000-gallon clear wells.

Sodium hypochlorite is used for disinfection and is injected by LMI metering pumps into a common header after the filters, but prior to the filtered water control chamber. Hypochlorite feed is flow paced based on the input from a Hach Cl17 continuous chlorine analyzer. The chemical is mixed in a 30 gallon day tank and diluted 1 gallon of water to 1 gallon of 12.5% NaOCl. Both a low and high residual alarm are tied to a Rayco Autodialer. The high alarm is set at 1.5 mg/L and the low alarm is set at 0.5 mg/L.

A number of in-line instruments are also installed in the filter plant and connected to the alarm system as follows: Raw water turbidity (informational); High and Low Clearwell levels (set at 10-feet and 6-feet); A high combined turbidity alarm is set at 0.89 NTU. Individual filtered water turbidity from each filter; chlorine residual just after injection but prior to the clear wells (set to alarm at 0.5 mg/L); pH and temperature of the final effluent leaving the plant. There are also alarms for raw water VFD failure, high and low water levels in the low lift station, fire, power failure, low plant temperature, low temperature in the low lift station, and filter plant flooding. All alarms initiate a dial-out sequence where the operator's cell phones are called. No remote operational control is provided. The operators must respond to any alarm condition by traveling to the treatment plant.

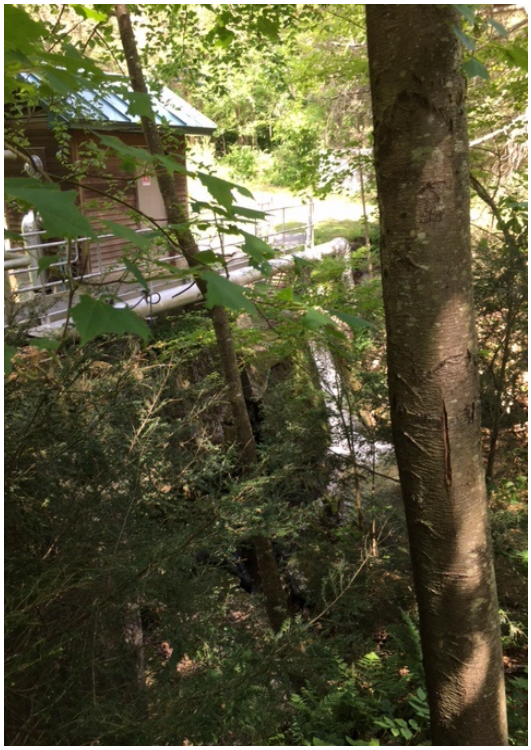
Two separate chart recorders receive data from in-line instruments and record raw water turbidity, filtered water turbidity, clear well depth, finished water flow, finished water chlorine residual and finished water pH. Each is a 7-day chart.

In the event of a power outage the filter plant is equipped with a 45 kW propane fueled generator. The generator will operate all filter plant equipment and is powered by a 300-cubic inch 6-cylinder Ford Industrial Engine. It has a capacity of at least 5-days of fuel and is tested every week.

In 2018 Egremont permitted and installed a corrosion control system using sodium carbonate or “soda ash” (Na_2CO_3) to address low pH levels with water leaving the treatment plant resulting in an exceedance of the lead action level. MassDEP issued its final approval within an October 9, 2019 letter. The treatment system consists of a single 18-inch diameter, 30-inch tall polypropylene tank for mixing, and equipped with an overflow flange, tank level sensors, a bolted cover, and a mechanical, propeller-type mixer. Soda Ash is pumped out of the top of the tank using flexible tubing, with the pumps interlocked with the flow meter (flow paced) and equipped with a spring-loaded manual override for overfeed protection. The system includes a continuous pH analyzer that send both high and low pH alarms to the EWD main control panel and will shut down the chemical feed pump on a high pH signal.

Karner Brook- Low Summer Flow

Karner Brook Raw water Pump Station



Karner Brook Reservoir Dam- Unsafe

Old Karner Brook transmission Main and Shut-off Valve

Chemical Addition

SANITARY SURVEY REPORT

Egremont Water Department

September 30, 2022

FINDINGS

SECTION 1: ADMINISTRATION, MANAGEMENT, AND STAFFING

Based on the sanitary survey inspection, MassDEP has determined that the EWD capacity to deliver safe drinking water to its customers should be changed from Conditional to Adequate.

Adequate Capacity:

"Capacity" refers to the ability of a public water system to assess, achieve, and maintain financial, managerial and technical compliance with applicable federal and state drinking water standards for the foreseeable future by demonstrating effective controls in all these areas. After conducting the sanitary survey and reviewing its managerial and financial status, the Department has determined that the Egremont Water Department has Adequate Capacity.

System Classification:

Nathan Stalker is sufficiently licensed to provide primary distribution and treatment operation services for this water system and is on-site a minimum of 6-hours per day (M-F) which meets the minimum staffing requirements as identified within a November 17, 2020 Administrative Consent Order. A System Staffing Plan, dated September 11, 2020, is on file with MassDEP. Linda Tims provided secondary treatment operator coverage, while James Olmsted and Eric Steuernagle are also appropriately licensed and available. **Should Egremont make a change in its primary or secondary water operator status, it must provide MassDEP with notification of the change within 7-days and must provide a revised System Staffing Plan within 30-days of that change. MassDEP is aware that Ms. Tims is no longer serving as a secondary operator. Egremont is required to comply with the provisions of 310 CMR 22.11B(3).**

EWD is classified as a Community (COM) public water system (PWS) because the facility serves up to 1,000 people during the summer.

The following Table lists the personnel employed by EWD for the operation of its PWS based on the most recent staffing plan submitted to MassDEP.

Operator Name	Grade	License	Primary Distribution	Primary Treatment	Secondary Distribution	Secondary Treatment
Nathan Stalker	1D/1T	28468/28469	X	X		
Linda Tims	1D OIT/1T OIT/VSS	25046/24525/ 12511				X

Egremont Water Department Operators at the time of the Sanitary Survey

Capital Improvement Plan:

In accordance with requirements included within MassDEP's 2019 sanitary survey report, Egremont worked with Tighe & Bond to develop a Capital Improvement Plan (March 2022) which incorporates elements of Asset management. The CIP does not include an Asset Management Plan (AMP), and the development of one is recommended in the CIP. The CIP identifies priority projects related to treatment, and distribution and identifies repairs to the Karner Brook Dam as Egremont's priority project followed by stabilization of the retaining wall adjacent to the treatment plant clear well.

The Karner Brook Dam has been found to be in unsafe condition as defined by the Office of Dam Safety due primarily to severe cracking and displacement of concrete. The dam is also being undermined by Karner Brook. Loss of the Dam would be catastrophic to the continued operation of the water system. **MassDEP requires annual updates on Egremont's progress in addressing this issue, with the first progress report due by November 30, 2022.**

Rate Study:

Although Egremont has developed a Capital Improvement Plan which identifies priority projects related to treatment, distribution and source availability, it has to develop a Rate Study (also recommended within the CIP). **MassDEP requires that by June 1, 2023, Egremont provide a copy of a completed Rate Study.**

Emergency Response Plan

During the survey, MassDEP observed that EWD maintains its emergency response plan (ERP) in a readily available location as required by the regulations at 310 CMR 22.04(13)(a) and uses the ERP to conduct annual training exercises. The ERP was last updated in 2018.

Consumer Confidence Report:

All Community Water Systems must prepare an annual Consumer Confidence Report (CCR) as specified in 310 CMR 22.16A. The CCR must be completed and delivered to consumers by July 1 of each year. MassDEP will complete CCR reviews on a selected number of systems each year.

MassDEP has prepared Source Water Assessment Reports for all Public Water Systems. Each system must include in the CCR Report, notification to customers of the availability of the report and the means to obtain it.

SECTION 2: OPERATIONS AND MAINTENANCE

Egremont's Operation and Maintenance Plan was available to review at the water treatment plant. The Plan was most recently developed in 2018 with an update in 2019 to incorporate the new pH adjustment system.

SECTION 3: TREATMENT

The Surface Water Treatment Rule (SWTR) , and the Massachusetts Drinking Water Regulations at 310 CMR 22.20A, require chlorine residual levels to be monitored daily to assure that minimum residual levels within the water entering the distribution system is always greater than 0.2 mg/l and that residual levels during peak hourly flow is sufficient to meet Egremont's disinfection contact time requirements. During the inspection, MassDEP observed that a single chlorine residual reading, generally taken in the morning, is reported as a means of demonstrating compliance with both requirements. This reported residual reading is not likely representing either the minimum for the day or the minimum during the peak hourly flow and is therefore not demonstrating compliance with either chlorine residual requirement. Historically, Egremont's chlorine residual levels are very consistent and well above the minimum of 0.2 mg/l and its reported CT values consistently and easily meet the required minimum. **Beginning with its November 2022 SWTR reporting, MassDEP requires that Egremont use its chart recorded residual levels to report the daily minimum and that the minimum during the peak hourly flow be used to calculated CT compliance.**

Egremont's source water, Karner Brook, is prone to high turbidity during storm events. Historically, Egremont's water operators have turned the raw water pumps off during a storm to prevent damage to the slow sand filters that may keep the treatment system out of service for an extended period of time. **With increased storm severity and frequency in recent years, MassDEP requires that by December 31, 2022, Egremont provide written notice the treatment plant's raw water turbidimeter has been equipped with a solenoid, or other means of automatically shutting down the raw water pumps in an event of the detection of turbidity at a pre-set level.**

SECTION 4: DISTRIBUTION, STORAGE, AND PUMPING FACILITIES

During the sanitary survey, EWD indicated that it conducts regularly water main flushing twice per year and at other locations more frequently based on complaints.

During the sanitary survey, MassDEP observed that EWD has a recent distribution system map with pipe sizes, locations, and materials.

Prior to the construction of Egremont's water filtration treatment plant, its Karner Brook source was filtered using an in-stream passive filtration system and was treated with a chlorine-based disinfection system. Once the new filtration plant was constructed in 1999 and a new raw water pump station went into use, the old transmission main that delivered water by gravity from the reservoir through the chlorine disinfection station was valved off in several locations and abandoned in-place, along with the prior chlorine disinfection station. It is MassDEP's understanding that the old transmission main also remains connected to the current water system at several closed valve locations. The use of closed valves which will eventually fail, to prevent untreated water from entering the distribution system is insufficient protection against contamination risks**. By November 30, 2022, provide written notice that the former transmission main has been cut and capped at the reservoir, as a means of preventing untreated water entering the current water system.**

Although a full cross-connection control survey of the entire Egremont system has been previously conducted, no testable backflow prevention devices are reported to be within the water system, and the cross-connection reporting section of recent Annual Statistical Reports (ASR) includes no information. Because the water system does serve locations that would typically include uses requiring testable backflow prevention devices (at least one agricultural connection, which also reportedly includes a private well; a small school with a boiler; and several commercial connections including restaurants), **MassDEP**

is now requiring that all non-residential service connections within Egremont's distribution system be resurveyed for potential cross connections, and that by November 30, 2022, the results of that effort be reported to MassDEP. All future ASRs must be accurately completed.

SECTION 5: WATER QUANTITY

The average daily demand for EWD was 43,371gallons per day based on the 2011 Annual Statistical Report. Annual average daily water withdrawal at EWD is less than 100,000 gallons per day. Therefore, EWD does not exceed the threshold requirements of the Water Management Act and does not require a Water Withdrawal Permit at this time.

Water use has been more consistent form month-to-month over the last two years and is attributed to more full residents, likely an off-shot of COVID.

A large break on Main Street was identified within the last three years and repaired, allowing Egremont to move its unaccounted water percentage to less than 30% for the first time in many years. Egremont's master meter has not been calibrated in years and its possible inaccuracy may be a factor in Egremont's ongoing struggle to decrease its unaccounted water percentages to within the State's goal of 10%. **By December 31, 2022, provide written notice that the treatment plant's master meter has been calibrated or replaced.**

SECTION 6: WATER QUALITY MONITORING AND REPORTING

MassDEP reviewed the most recent EWD Water Quality Sampling Schedule (WQSS) dated May 25, 2022. EWD is required to collect water quality samples according to that schedule. The most current WQSS is available on-line at:
http://www.mass.gov/eea/agencies/massdep/water/drinking/pws-documents-search-tool.html.

Bacteriological Monitoring Under the Revised Total Coliform Rule

The required number of total routine monthly coliform samples is based primarily on population and system characteristics. Under the Revised Total Coliform Rule, monthly routine sampling locations representative of entry points and storage must also be provided in the Coliform Sampling Plan. If the EWD population changes such that it exceeds or falls below a threshold listed in Table I of 310 CMR 22.05 EWD must contact the MassDEP regional office to update its Coliform Sampling Plan. System characteristics such as storage, treatment facilities, source water quality, and the number of sources also affect the total number of required coliform sampling locations. For those systems that treat the source water, the Coliform Sampling Plan must include an additional routine monthly sample collected from the raw water source(s) per 310 CMR 22.05(1)(a). The Coliform Sampling Plan must also list all groundwater sources to be sampled to meet the requirements of the Groundwater Rule.

MassDEP reviewed the most recent Coliform Bacteria Sample Plan which includes the following sampling locations:

- Site(s) representative of the water throughout the distribution system: Village Inn, Country Market (summer)
- Site(s) representative of raw water prior to treatment: reservoir tap
- Site(s) representative of treated water: Entry point downstream of clear well
- Site(s) representative of storage: Entry point downstream of clear well

MassDEP is in the process of updating all Coliform Sampling Plans to make them compliant with the Revised Total Coliform Rule. Changes made to these plans will be reflected in the WQSSs. **MassDEP advises EWD that the Revised Total Coliform Rule was implemented on April 1, 2016 (see Section 8 for Revised Total Coliform Rule (RTCR) highlights).**

As part of its implementation of the revised Total Coliform Rule, MassDEP will be developing new Coliform Bacteria Sampling Plans. **A new Plan will be provided to Egremont to be signed and returned to MassDEP within 30-days of receipt and Egremont will begin sampling according to the new Plan.**

Chemical Monitoring

The current monitoring period for 2020-22 represents the first period of a 9-year monitoring cycle. Your Water Quality Sample Schedule (WQSS) for this period has been updated to reflect all monitoring waivers. A new WQSS covering the 2023-25 monitoring period will provided to you soon, which will reflect new monitoring requirements associated with PFAS6 (see Section 8 for more information).

Radiological Monitoring

Monitoring waivers are not considered for radiological monitoring. Monitoring frequencies for radionuclides are pre-determined by the Standardized Monitoring Framework and have been incorporated into the WQSS by MassDEP/DWP/WERO. These frequencies are based on either the grandfathered results of samples collected before December 8, 2003 or from results collected since that date.

Lead and Copper Monitoring

A review of MassDEP records indicates that EWD has twice yearly monitoring requirements for Lead and Copper from **20** approved sampling locations. EWD is required to collect the next round of **20** samples by December 31, 2022.

The following tips may be useful in complying with the Lead and Copper regulations in the future:

- All samples must be collected within the required time frame. Late sample data submitted will not be accepted.
- Once a sample bottle has been accepted by the water system and delivered to the laboratory, the results cannot be invalidated due to sampling practices.
- EWD must collect 2 samples (kitchen and bubbler) from two schools/daycares served by the water system during each sampling round if it serves such facilities. School/daycare results are not included in the 90th percentile calculation. Samples from schools/daycares are to be 250 milliliters in volume, not 1 liter.

MassDEP has released a web-based water quality data submission feature in its electronic submission website (eDEP). eDEP now allows certified labs to submit water quality data electronically. PWS users have the ability to view their data on-line. To start using eDEP or to learn more about electronic submission of water quality data, please visit: https://edep.dep.mass.gov/DEPHome.aspx on the world-wide web.

SECTION 7: SOURCE AND SOURCE PROTECTION

The following table lists the potential contamination sources observed in the inspection.

PWSID	Source Name	Non-Conforming Activities in Zone A	Zone B
1090000-01S	Karner Brook Reservoir	residential/septic systems, Town roads	Same as Zone A

Nonconforming Activities within wellhead or surface water protection areas

The protection of a surface water recharge area (watershed) is critical to maintaining a safe and ample supply of water to the EWD. Activities throughout the watershed should be assessed and evaluated for the potential to impact water quality. Protection zones become more critical to water quality, and the allowable activities within the zones more restrictive, closer to the source water. Zone A is the most vulnerable and restrictive protection zone around a reservoir and tributary streams (source water). The Zone A is the area 400 feet from the edge of the reservoir and 200 feet from the edge of all tributaries draining into it. Zone B is the area ½ mile from the edge of the reservoirs but does not extend beyond the outer edge of the watershed. Zone C is the remaining area in the watershed not designated as Zone A or B.

SECTION 8: CURRENT AND FUTURE REGULATORY REQUIREMENTS

New regulation regarding Per- and Polyfluoroalkyl Substances (PFAS)

- On October 2, 2020, MassDEP published new regulations establishing an MCL of 0.000020 mg/L or 20 parts per trillion (ppt) for the sum of six PFAS compounds (PFOS, PFOA, PFHxS, PFNA, PFHpA and PFDA), otherwise defined at PFAS6.
- Routine compliance monitoring for PFAS6 will begin in 2021 for COM and NTNC public water systems. TNC public water systems must collect, analyze, and report sampling results by September 30, 2022.
- MassDEP will begin issuing revised water quality sample schedules to all PWS reflecting monitoring for PFAS6.
- For more information on PFAS, and opportunities for technical and financial assistance, refer to the following:
  - MassDEP Per- and Polyfluoroalkyl Substances (PFAS) Drinking Water Regulations Quick Reference Guide https://www.mass.gov/doc/per-and-polyfluoroalkyl-substances-pfas-drinking-water-regulations-quick-reference-guide/download
  - MassDEP Per- and Polyfluoroalkyl Substances (PFAS) website: https://www.mass.gov/info-details/per-and-polyfluoroalkyl-substances-pfas
  - Final MassDEP PFAS drinking water regulations https://www.mass.gov/lists/development-of-a-pfas-drinking-water-standard-mcl#final-pfas-mcl-regulations-

Revised Total Coliform Rule (RTCR) Highlights

Massachusetts incorporated EPAs' Revised Total Coliform Rule (RTCR) into its revised Drinking Water Regulations which became effective April, 2016. The RTCR contains the following provisions to increase public health protection by focusing on measures that will reduce potential pathways for the entry to fecal contamination into public water system (PWS) distribution systems. Under the RTCR, PWSs that are vulnerable to microbial contamination are required to conduct detailed investigations to identify and fix problems. The RTCR establishes an MCL for *E. coli*, since it is a more specific indicator of fecal contamination and a potentially more harmful pathogen than other coliform bacteria. The Total Coliform Rule's previous MCL violation for total coliform bacteria has been replaced by a Treatment Technique trigger that requires a Level 1 Assessment.

Sampling

The number of routine monthly samples is still population-based, but there are requirements for additional entry point and storage samples. All routine monthly samples must be collected, even if a Treatment Technique trigger has been exceeded or there is an *E. coli* MCL.

Three repeat samples are required for every total coliform positive (TC+) location, regardless of system size and even if the TC+ location is at the end of the distribution system. Additional rounds of repeats must be collected until a treatment technique trigger is exceeded or one clean round of samples has been obtained.

Only systems on quarterly monitoring are required to collect additional routine samples in a month following a TC+. All other systems collect their normal number of monthly routine samples.

Seasonal Systems

Seasonal systems that are not operated as PWSs on a year-round basis and start up and shut down each operating season, must demonstrate completion of a state-approved Start-up Procedure and Certification prior to serving water to the public each season. The Certification must be submitted to MassDEP 7 days prior to serving water to the public. The approved procedure must demonstrate completion of the following activities, at a minimum:

- Notification to MassDEP and the Certified Operator of the planned date on which water will be served to the public;
- Inspection of all water system components (i.e., sources, treatment components, distribution lines and storage tanks) along with completion of any required repairs and maintenance;
- Activation of source(s);
- Flushing of the entire distribution system(s); and,
- Collection of seasonal start-up samples from all routine monthly locations, as well as any additional locations required within any re-activated portions of the distribution system.

Additional start-up activities may include chlorination of the tanks and distribution system, re-installation and maintenance of required disinfection equipment, and re-installation of water meters and backflow preventers, if applicable.

Treatment Technique Triggers and Assessments:

PWSs must conduct Assessments after exceeding a Treatment Technique (TT) Trigger and must notify MassDEP no later than 5 days after the collection date of the sample that triggered the assessment.

Level 1 Treatment Technique Triggers:

- More that 5% of monthly samples are TC+ for a system collecting 40 or more samples per month (former TC MCL) - *NO PUBLIC NOTICE (PN) REQUIRED*;
- More than 2 TC+ samples per month for systems collecting fewer than 40 samples per month (former TC MCL) - *NO PN REQUIRED*; and,
- Failure to take every required **repeat sample** after any single **TC+** sample - *NO PN REQUIRED.*

Level 2 Treatment Technique Triggers:

➢ An *E. coli* MCL Violation (Requires TIER 1 PN and same day notification to MassDEP):

- **EC+ repeat** sample following a **TC+ routine** sample (former acute MCL);
- **TC+ repeat** sample following an **EC+ routine** sample (former acute MCL);
- Failure to take all required **repeats** following a **EC+ routine** sample; and,
- Failure to analyze for ***E. coli*** in a **TC+ repeat** sample.

➢ A second occurrence of a level 1 Trigger within a rolling 12-month period - unless MassDEP determines the reason for the TC+ detection related to the first Level 1 Trigger and the PWS has corrected that problem.

Level 1 and Level 2 Assessments are conducted to identify the possible presence of sanitary defects and defects in distribution system monitoring practices. The elements of a Level 2 Assessment are generally the same as those of a Level 1 Assessment, but each element is investigated in more detail.

At a minimum, both Level 1 and Level 2 Assessments must evaluate the following elements: atypical events, changes in distribution system maintenance and operation, condition of the source and treatment, and inadequacies in sample sites, sampling protocol and sample processing. Level 1 and Level 2 Assessments must describe any Sanitary Defects found, describe all completed Corrective Actions, and propose a timetable for completing any Corrective Actions that have not been completed by the time the Assessment Form is submitted (i.e., 30 days from the triggering event). MassDEP must be notified when each of these Corrective Actions has been completed.

RTCR Violations and Public Notice Requirements

There are a number of new violations under the RTCR. All violations require some form of public notice. There is also new mandatory health effects language for public notices and Consumer Confidence Reports (CCRs). MCL, Monitoring and Treatment Technique Violations must be reported in CCRs along with appropriate health language. CCRs must also contain information on *E. coli* detections and Level 1 and Level 2 Assessments. All RTCR violations are listed below.

E. coli MCL Violations (individual types listed above) (Require TIER 1 PN within 24 hours and same day notification to MassDEP)

Treatment Technique Violations (Require TIER 2 PN within 30 DAYS and notification to MassDEP no later than end of next business day after learning of violation.):

- Failure to conduct a Level 1 or 2 Assessment or implement Corrective Actions within the specified timeframe.
- Failure of a Seasonal System to complete a MassDEP-approved Start-up Procedure and Certification prior to serving water to the public.

Monitoring Violations (Require TIER 3 PN within 1 YEAR and notification to MassDEP within 10 days of learning of violation):

- Failure to take every required **routine or additional routine sample** in a Compliance Period.
- Failure to analyze for ***E. coli* in a TC+ routine** sample.

Reporting Violations (Require TIER 3 PN within 1 YEAR):

- Failure to submit a monitoring report or Assessment Form by the required deadline, after completing timely monitoring or Assessment.
- Failure to notify MassDEP of an **EC+** result by the **end of the day** on which the PWS was notified of the result.
- Failure to notify MassDEP of an ***E. coli*** MCL violation by the end of the day on which PWS learns of the violation.
- Failure to submit Certification of completion of a MassDEP-approved Seasonal Start-up Procedure **7 days** prior to the date on which the PWS will begin serving water to the public.
- Failure to notify MassDEP of a Treatment Technique Trigger **within 5 days** of the collection date of the sample that triggered the Assessment.
- Failure to notify MassDEP of a coliform monitoring violation **within 10 days** of learning of the violation.

Recordkeeping Violations (Require TIER 3 PN within 1 YEAR):

- Failure to maintain Assessment Forms, Corrective Action documentation or other summary documentation of Sanitary Defects for **at least 5 years**.
- Failure to maintain a record of any repeat sample taken that meets state criteria for an extension of the 24-hour period for collecting repeat samples (per 310 CMR 22.05(2)(a).

Emergency Plans, Response and Reporting Requirements:

On May 2, 2008, MassDEP issued revised regulations regarding emergency plans, response and reporting requirements. As of that date, Public Water Systems were required to have prepared an Emergency Response Plan, which includes appropriate response actions to potential or actual emergencies, including but not limited to:

1. Loss of water supply from a source;
2. Loss of water supply due to major component failure;
3. Damage to power supply equipment or loss of power;
4. Contamination of water in the distribution system from backflow or other causes;
5. Collapse of a reservoir, reservoir roof, or pump house structure;
6. Break in a transmission or distribution line that could result in a loss of service to customers for more than four hours;
7. Potential or imminent threat of chemical or microbiological contamination of the water supply over limits specified by MassDEP's Office of Research and Standards' as set forth in the *Standards and Guidelines for Contaminants in Massachusetts Drinking Waters.* (available on-line at http://www.mass.gov/dep/water/laws/regulati.htm#chems);
8. Potential or imminent threat of an overfeed of an approved drinking water treatment chemical into the system;
9. An act of vandalism or sabotage that has the potential to impact or impacts water quality or the quantity of water available to the system.
10. A shortage or lack of resources that could affect the operations of the system, such as:
    a. Staffing shortages:
    b. Receipt of notice from a power utility of lengthy power outages; or
    c. Imminent depletion of treatment chemical inventory; and
11. Any other failure of part or all of the water supply system due to equipment failure, human acts (deliberate or accidental) or natural or human made disasters.

These requirements are described in sections 310 CMR 22.04(13) of the Regulations.

Section 310 CMR 22.15(9) of the regulations incorporates 2-hour and 24-hour emergency notification requirements to both MassDEP and the Board of Health, for specified emergency. Within 30-days of a reportable emergency, the water supplier must complete an Emergency Response Report and submit a copy of that Report to MassDEP for Level III, Level IV or Level V emergencies, Cross Connection incidents, and any of the emergency incidents listed in Items #1 through #11 above.

Every public water supplier was required to submit an Emergency Response (ERP) Compliance Checklist to MassDEP by December 31, 2009.

UIC Issues

The Underground Injection Control (UIC) Program regulates discharges to the ground via Class V wells such as dry wells, septic systems tied to industrial processes, leaching catch basins and other subsurface leaching systems. The UIC Regulations list authorized activities in 310 CMR 27.05, including heat exchanger return water, non-contact cooling water, storm water drainage, waste fluids other than sanitary waste, aquifer recharge wells, and salt water barrier intrusion wells. Prohibited activities are listed in 310 CMR 27.04, and generally, include the introduction of fluid containing any pollutant that would likely cause a violation of the Massachusetts Drinking Water Regulations, the groundwater discharge standards listed in 314 CMR 5.10 or adversely affect the health of persons. One common unpermitted UIC application is for floor drains in a boiler room piped to a drywell or septic systems in facilities that are unsewered. Contact Joe Cerutti at (617) 292-5859 if the PWS source area has any unregistered UICs.

Radionuclides Rule

This rule applies to community water systems of all sizes and is currently in effect. This rule retains the existing MCLs for combined radium-226 and radium-228, and gross alpha particle radioactivity, and specifies an MCL of 30 ug/L for uranium. Please refer to the EWD Water Quality Sampling Schedule for specific testing requirements.

Disinfectant Byproduct Rules (Stage 1 & 2 DBPR)

Both of these rules apply to all sizes of community water systems and non-transient, non-community PWSs that add a disinfectant (other than ultraviolet light) to the water. The rules are intended to reduce potential cancer and reproductive and developmental health risks from disinfection byproducts in drinking water that form when disinfectants are used to control microbial pathogens.

The Stage 1 rule has been in effect since 2000 and establishes MCLs for TTHMs, five haloacetic acids (HAA5s), bromate, and chlorite. The MCLs for TTHMs and HAA5s are 0.080 mg/L and 0.060 mg/L, respectively. The rule also establishes a maximum residual disinfectant level (MRDL) for chlorine of 4.0 mg/L.

The more recent Stage 2 rule (published January 4, 2006) does not change any of the MCLs, but does require that most water systems evaluate their distribution system (Interim Distribution System Evaluation- “IDSE”) to determine if there are other locations with elevated disinfection byproduct concentrations that were not sampled under the Stage 1 Rule. These locations will then be used by the system as the sampling sites for Stage 2 DBPR compliance monitoring. Some systems, with historically low levels of TTHMs and HAA5s (below 0.040 mg/L and 0.030 mg/L respectively), were granted a waiver from having to do any additional samples/studies.

MassDEP is in the process of evaluating all Stage 1 and IDSE data for all water systems that must comply with the Disinfection Byproduct Rules. A determination has been made regarding the location and frequency of all required Stage 2 Rule sampling. The sampling locations and frequencies were included in current sampling schedules that were to sent to all Public Water Systems. Monitoring for Stage 2 has begun. Compliance under the Stage 2 rule is determined by using the running annual average at each sampling location instead of averaging the results from all sampling sites as one done under the Stage 1 rule. For systems that only sample once per year, or once every three years, compliance will be based upon that single sample result.

Long Term 1 Enhanced Surface Water Treatment Rule (LT1ESWTR)

This rule applies to all public water systems that use surface water or ground water under the direct influence of surface water and serve less than 10,000 people and was made effective on January 14, 2005. This rule adds requirements for control of *Cryptosporidium* and sets a MCLG of zero for this pathogen. Systems must achieve at least a 2-log removal of *Cryptosporidium*, which is demonstrated by meeting new effluent turbidity limits specified below. Systems are still required to meet a 3-log removal/inactivation of *Giardia* and a 4-log removal/inactivation of viruses. The new turbidity requirements are stipulated as follows:

- Combined effluent performance requirements for plants using conventional filtration treatment or direct filtration:
- Combined filtered water effluent turbidity must be less than or equal to 0.3 NTU in at least 95% of the measurements taken each month, with measurements taken every four hours of operation.
- Combined filtered water effluent turbidity must not exceed 1.0 NTU at any time with measurements taken in four-hour intervals.
- Individual filter performance requirements for these systems.
- Individual filter effluent must be monitored continuously for turbidity.
- Any individual filter with a turbidity level greater than 1.0 NTU must be reported to MassDEP.
- Any individual filter with a turbidity level greater than 0.5 NTU at the end of the first four hours of filter operation (following backwash or when off-line filters are put on-line) must be reported to MassDEP.

Turbidity limits and monitoring requirements for slow sand systems will not change under this rule.

Long Term 2 Enhanced Surface Water Treatment Rule (LT2ESWTR)

EPA published the LT2ESWTR on January 5, 2006, which will reduce illness linked with the contaminant *Cryptosporidium* and other pathogenic microorganisms in drinking water. Under this rule, systems monitored their water sources to determine treatment requirements. The monitoring included an initial two years of monthly sampling for *Cryptosporidium*. To reduce monitoring costs, small filtered water systems (those serving under 10,000) first monitored for *E. coli*, which is less expensive than *Cryptosporidium* analysis. These small systems monitored for *Cryptosporidium* only if their *E. coli* results exceed specified concentration levels.

Monitoring starting dates were staggered by system size, with smaller systems beginning monitoring after larger systems. Systems were to conduct a second round of monitoring six years after completing the initial round to determine if source water conditions have changed significantly. Systems could use (grandfathered) previously collected data in lieu of conducting new monitoring, and systems were not required to monitor if they provide the maximum level of treatment required under this rule.

In addition, systems must review their current level of microbial treatment before making a significant change in their disinfection practice. This review will assist systems in maintaining protection against microbial pathogens as they take steps to reduce the formation of disinfection byproducts under the Stage 2 DBPR.

In addition, before making a significant change in their disinfection practice, systems must review their current level of microbial treatment. This review will assist systems in maintaining protection against microbial pathogens as they take steps to reduce the formation of disinfection byproducts under the Stage 2 DBPR.

MassDEP has obtained primacy for this rule, submittals are required to be made to MassDEP.

SANITARY SURVEY COMPLIANCE PLAN
RESPONSE FORM for TABLE A or B

Within 30 days of receipt of this inspection report, you must complete and submit this response form if your system has TABLE A –Violations and/or TABLE B-Deficiencies (see attached Compliance Tables). Attach a copy of the completed tables listing the date that the corrective action was or will be taken by your system and all other applicable documentation. (310 CMR 22.04(12))

Please note that violations listed in TABLE A of the Compliance Plan are also a Notice of Noncompliance (NON) pursuant to M.G.L. c.21A, §16 and 310 C.M.R. 5.00 and may require the submission of quarterly written progress reports on the identified violations.

The following corrective actions listed in the Sanitary Survey Compliance Plan(s) TABLE A and/or B has been taken by the public water system. (Please check all that apply).

☐ My system has taken **ALL** of the corrective actions listed within the timeframes specified in the Sanitary Survey Compliance Plan(s).
- For each item, I have listed the completion date of the corrective action within each table.
- I have attached copies of supporting documentation as required.

☐ My system has taken **SOME BUT NOT ALL** of the corrective actions listed within the timeframes specified in the Sanitary Survey Compliance Plan(s). My system **HAS NOT** complied with **ALL** of the requirements set forth in the Sanitary Survey Compliance Plan(s).
- For each item, I have listed the actual or anticipated completion date of the corrective action within each table.
- I have attached copies of supporting documentation as required.
- I have attached a revised corrective action schedule establishing timelines for my system to address outstanding items and I will submit a written progress report each quarter (every 3 months) until all items have been addressed. I understand that my system may be subject to further enforcement action.

☐ My system is **UNABLE** to comply with some or all of the corrective actions within the timeframes specified in the Sanitary Survey Compliance Plan(s). I understand that my system may be subject to further enforcement action.
- An explanation is attached.

I hereby acknowledge receipt of the inspection findings and compliance plan table(s) of the sanitary survey conducted by the Department of Environmental Protection's Drinking Water Program. I certify that under penalty of law I am the person authorized to fill out this form and the information contained herein is true, accurate and complete to the best of my knowledge and belief.

Water Commissioner, Owner, Owner Representative or Other Responsible Party:

Signature: _____ Date: _____

Print Name: _____ Title: _____

Return this form, a copy of each Compliance Plan Table and all attachments to:
DEP-BRP Drinking Water Program, 436 Dwight Street, Springfield, MA 01103
Attention: Doug Paine

SANITARY SURVEY
COMPLIANCE PLAN- SECTION B – REQUIREMENTS

Sanitary survey items that are required to be corrected to improve the protection of drinking water and public health pursuant to M.G.L. 111§ 160. MassDEP/DWP will provide technical assistance to systems responding to these deficiencies. Please call your regional DWP office for referral to the appropriate staff person.

Section	Deficiencies	Corrective Actions	Deadline for Taking Corrective Actions	Sig. Def.?	Completed Date
Administration	Nathan Stalker is sufficiently licensed to provide primary distribution and treatment operation services for this water	Should Egremont make a change in its primary or secondary water operator status, it must provide MassDEP with notification of the change within 7-days and must provide a revised System Staffing Plan within 30-days of that change. MassDEP is aware that Ms. Tims is no longer serving as a secondary operator. Egremont is required to comply with the provisions of 310 CMR 22.11B(3).	October 11, 2022	No	
Administration	The Karner Brook Dam has been found to be in unsafe condition as defined by the Office of Dam Safety due primarily to severe cracking and displacement of concrete. The dam is also being undermined by Karner Brook. Loss of the Dam would be catastrophic to the continued operation of the water system.	MassDEP requires annual updates on Egremont's progress in addressing this issue.	First annual report due by November 30, 2022		
Administration	Although Egremont has developed a Capital Improvement Plan which identifies priority projects related to treatment, distribution and source availability, it has to develop a Rate Study (also recommended within the	Provide a copy of a completed Rate Study.	June 1, 2023		

	CIP).				
Treatment	Chlorine residual levels must be monitored daily to assure that minimum residual levels within the water entering the distribution system is always greater than 0.2 mg/l and that residual levels during peak hourly flow is sufficient to meet Egremont's disinfection contact time requirements. During the inspection, MassDEP observed that a single chlorine residual reading, generally taken in the morning, is reported as a means of demonstrating compliance with both requirements.	Egremont must use its chart recorded residual levels to report the daily minimum and that the minimum during the peak hourly flow be used to calculated CT compliance.	Beginning with its November 2022 SWTR reporting,		
Treatment	Egremont's source water, Karner Brook, is prone to high turbidity during storm events.	Provide written notice the treatment plant's raw water turbidimeter has been equipped with a solenoid, or other means of automatically shutting down the raw water pumps in an event of the detection of turbidity at a pre-set level.	December 31, 2022		
Distribution	Once the new filtration plant was constructed in 1999 and a new raw water pump station went into use, the old transmission main that delivered water by gravity from the reservoir through the chlorine disinfection station was valved off in several locations and abandoned in-place, along with the prior chlorine disinfection station. The use of closed valves which will eventually fail, to prevent untreated water from entering the distribution system is insufficient protection against contamination risks.	Provide written notice that the former transmission main has been cut and capped at the reservoir, as a means of preventing untreated water entering the current water system.	November 30, 2022	No	
Distribution	Although a full cross-connection control survey of the entire Egremont system has been previously conducted, no testable backflow prevention devices are reported to be within the water system, and the cross-connection reporting section of recent Annual Statistical Reports (ASR) includes no information. Because the water system	All non-residential service connections within Egremont's distribution system must be resurveyed for potential cross connections, and the results of that effort be reported to MassDEP.	November 30, 2022	No	

	does serve locations that would typically include uses requiring testable backflow prevention devices (at least one agricultural connection, which also reportedly includes a private well; a small school with a boiler; and several commercial connections including restaurants),				
Water Quantity	Egremont's master meter has not been calibrated in years	Provide written notice that the treatment plant's master meter has been calibrated or replaced.	December 31, 2022	No	
Water Quality	As part of its implementation of the revised Total Coliform Rule, MassDEP will be developing new Coliform Bacteria Sampling Plans.	A new Plan will be provided to Egremont to be signed and returned to MassDEP and Egremont will begin sampling according to the new Plan.	Within 30-days of receipt		

* MassDEP reserves the right to exercise its Order authority under M.G.L. Chapter 111, Section 160, or to take other appropriate action as permitted by law, in order to prevent the pollution and to secure the sanitary protection of the water supply and to ensure the delivery of a fit and pure water supply to all consumers, including without limitation if sufficient progress to meeting a recommended deadline is not achieved.

** MassDEP requests that periodic progress reports be submitted, *e.g.*, quarterly (each January 1st, April 1st, August 1st, December 1st, etc., for as long as necessary) or otherwise.

GWR SD = Ground Water Rule Significant Deficiency