

**Paul Rafuse**

---

**From:** James Kreidler <jkreidler@townsend.ma.us>  
**Sent:** Friday, July 14, 2017 9:59 AM  
**To:** 'Steve Doucette'; 'Paul Rafuse'  
**Cc:** 'Nathan Mattila'; 'David Jenkins'; Cindy King; Gordy Clark; James M. Kreidler; Kelly Merrill; Sue Lisio  
**Subject:** RE: Selectman's Meeting 6/27  
  
**Categories:** Red Category

Dear Attorney Doucette,

I have forwarded your letter to the members of the Board of Selectmen in an effort at arriving at a date for the joint meeting. I will advise once I have heard back from them.

Please allow one correction to your letter. You wrote that the town has, "without legal justification, refused to process Paul Rafuse's standby pay." This is incorrect. Paul's standby pay has been being processed and the checks are being held in the treasurer's office, with Paul's consent, until the matters before us are resolved.

Kind Regards,

Jim

**From:** Steve Doucette [mailto:steve@dandllaw.com]  
**Sent:** Monday, July 10, 2017 5:09 PM  
**To:** Paul Rafuse  
**Cc:** James Kreidler; Nathan Mattila  
**Subject:** Re: Selectman's Meeting 6/27

Mr. Kreidler I have not heard from you or the Selectmen. I have attached a letter that I have placed in the mail today regarding a meeting between the Boards.

Steve Doucette

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Jim,

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**To:** Paul Rafuse <[prafuse@townsend.ma.us](mailto:prafuse@townsend.ma.us)>

**Subject:** Selectman's Meeting 6/27

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Best ,

Kelly

*Kelly Merrill, Executive Assistant to the Town Administrator*

Email: [kmerrill@townsend.ma.us](mailto:kmerrill@townsend.ma.us)

Town of Townsend

272 Main Street

Townsend, MA 01469-1519

PH: [978-597-1701](tel:978-597-1701)

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**Paul Rafuse**

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**From:** Paul Rafuse <prafuse@townsend.ma.us>  
**Sent:** Friday, July 14, 2017 10:06 AM  
**To:** 'lance.lewand@gmail.com'  
**Subject:** FW: Selectman's Meeting 6/27  
  
**Categories:** Red Category

FYI, from the Town Administrator.

---

**From:** James Kreidler [mailto:jkreidler@townsend.ma.us]  
**Sent:** Friday, July 14, 2017 9:59 AM  
**To:** 'Steve Doucette' <steve@dandllaw.com>; 'Paul Rafuse' <prafuse@townsend.ma.us>  
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*Kelly Merrill, Executive Assistant to the Town Administrator*

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**Paul Rafuse**

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**From:** James Kreidler <jkreibler@townsend.ma.us>  
**Sent:** Tuesday, July 11, 2017 3:03 PM  
**To:** 'Paul Rafuse'  
**Subject:** Document Request  
**Categories:** Red Category

Paul,

Please forward me a copy of the Water Supplier Response and Compliance Form that you forwarded to DEP as referenced in the BOWC meeting held last Thursday.

Thank you.

Jim  
James M. Kreidler  
Town Administrator  
Town of Townsend  
272 Main Street  
Townsend, MA 01469  
(978) 597-1700  
[jkreibler@townsend.ma.us](mailto:jkreibler@townsend.ma.us)

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**DOUCETTE & LaROSE, LLC**  
Attorneys at Law  
251 Main Street  
Oxford, Massachusetts 01540

Stephen G. Doucette\*♦  
Courtney Ross Escobar\*Δ  
\* Admitted in Massachusetts  
♦ Admitted in Rhode Island  
Δ Admitted in New York

Phone: (508) 987-9944  
Fax: (508) 987-9945

July 10, 2017

Board of Selectmen  
Town of Townsend  
272 Main Street  
Townsend, MA 01469

Re: Townsend Water Department

Dear Members of the Board:

On May 26, 2017 I sent the Board of Selectmen a letter on behalf of the Board of Water Commissioners to arrange a meeting to discuss the future relationship and interactions between the Water Commissioners and the Selectmen. As you well know, by an overwhelming vote at the Town Meeting the citizens adopted Section 69B, unequivocally expressing their view that the Board of Water Commissioners should operate the Water Department independently.

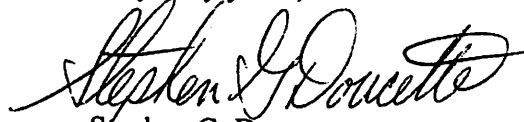
Nevertheless, since that vote there appears to still be issues concerning the independent status of the Water Department. For example, you have, without legal justification, refused to process and pay Paul Rafuse's stand by pay; you have also refused to pay the Water Department's invoices for outside legal counsel. The Town vote and adoption of Section 69B gave the Water Commissioners and the Superintendent the exclusive control over the operations of the Water Department, and that includes who takes the weekend stand by and also the hiring of its own legal counsel. As my client has repeatedly stated, the Water Commissioners would like to do whatever is necessary to avoid a long and costly declaratory judgment lawsuit in the Middlesex Superior Court. However, your failure to respond to their request for a meeting, and your repeated failure to acknowledge the Board of Water Commissioners as an independent Board, is leading everyone down the path towards litigation. Paul Rafuse provided you and the Town Administrator with several dates that the Water Commissioners are available to meet with the Board of Selectmen to discuss this new relationship. It is in the best interests of the citizens of Townsend to see whether there is the ability for everyone to work together.

The Water Commissioners want a good and amicable working arrangement with the Town and very much want to avoid the need for a lawsuit to settle these matters. However, your silence and failure to respond with a meeting date is leaving the Water Commissioners with no option but to file a declaratory judgment action. If the lawsuit is filed it will be because the Board of Selectmen just inexplicably refused to meet with the Water Commissioners and discuss the new autonomy of the Water Department.

Board of Selectmen  
Town of Townsend  
July 10, 2017  
p. 2

Please contact me, or Paul Rafuse, to arrange a date for a meeting between the Selectmen and the Water Commissioners. I recognize that both Boards will have to publish this meeting under the Open Meeting Law so kindly respond to Paul Rafuse's June 28, 2017 email where he provided multiple possible meeting dates. Please provide Paul with some dates so that we can move this forward. The Water Commissioners do not want the next communication with the Selectmen to be a summons and complaint, but they are prepared to move in that direction if necessary.

Very truly yours,



Stephen G. Doucette

cc: Board of Commissioners  
Townsend Water Department

James Kreidler

**Paul Rafuse**

---

**From:** Paul Rafuse <prafuse@townsend.ma.us>  
**Sent:** Tuesday, July 11, 2017 9:17 AM  
**To:** Nathan Mattila  
**Subject:** FW: Selectman's Meeting 6/27  
**Attachments:** 7-10-17 Selectmen Letter.pdf

**Categories:** Red Category

Good Morning,

I/we have not heard anything from Mr. Kreidler with a date for our joint meeting with the Board of Selectmen since my email to him on June 28<sup>th</sup> and prior to that as instructed by the Board of Selectmen to have him facilitate a joint meeting between Boards at a Board of Selectmen's meeting on June 13, 2017. With that, I took the liberty of requesting our Counsel, Atty. Doucette to submit another letter to Mr. Kreidler (see attached). I'm providing you with this for your information because I will have it on the Boards next agenda to discuss if the Board would like to do so.

Thank you

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**To:** Nathan Mattila  
**Cc:** Savas Danos ; Steven Doucette (steve@dandllaw.com)  
**Subject:** FW: Water Department Sanitary Surveys- 2010 and 2013  
**Attachments:** 2010 sanitary survey.pdf; Townsend-2299000-SS-ENF-(NON-CE-13-5D149)-2013-12-04.pdf  
  
**Categories:** Red Category

FYI,

Just received this from Jim. He hasn't yet responded to my email prior to receiving this regarding utilizing the downstairs meeting room for overflow and providing audio.

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**Sent:** Thursday, July 06, 2017 12:01 PM  
**To:** Sue Lisio <sml412@comcast.net>; 'Paul Rafuse' <prafuse@townsend.ma.us>  
**Subject:** Water Department Sanitary Surveys- 2010 and 2013

Sue and Paul,

For your information, I am attaching copies of the prior two Water Department Sanitary Surveys just to make sure you have this information prior to this evening's meeting.

Gordon will not be attending and Cindy will. Cindy has these documents too.

Paul, I would request that you make certain that the Commissioners are aware that these documents are in hand and under review from a comparative perspective when discussing things this evening.

Thank you,

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James M. Kreidler  
Town Administrator  
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[jkreidler@townsend.ma.us](mailto:jkreidler@townsend.ma.us)

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COMMONWEALTH OF MASSACHUSETTS  
EXECUTIVE OFFICE OF ENERGY & ENVIRONMENTAL AFFAIRS  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
Central Regional Office, 627 Main Street, Worcester, MA 01608

**FILE COPY**

DEVAL L. PATRICK  
Governor

TIMOTHY P. MURRAY  
Lieutenant Governor

IAN A. BOWLES  
Secretary

LAURIE BURT  
Commissioner

Date: November 23, 2010

Townsend Water Department  
PO Box 17  
Townsend, MA 01469  
Attn: Mr. Paul Rafuse

RE: City/Town: **Townsend**  
PWS Name: **Townsend Water Department**  
PWS ID#: **2299000**  
Program: **Sanitary Surveys**

Activity No: **NON-CE-10-5D145**

Dear Public Water System Official:

Please find attached the following information:

Sanitary Survey Report including a Notice of Noncompliance for survey performed at TOWNSEND WATER DEPARTMENT, Townsend, Massachusetts on October 5, 2010.

Please note that the signature on this cover letter indicates formal issuance of the attached document. If you have any questions regarding this letter, please contact Kristin Divris at 508-365-8539 or [Kristin.divris@state.ma.us](mailto:Kristin.divris@state.ma.us).

Sincerely,

Marielle Stone  
Section Chief  
MassDEP Drinking Water Program  
Central Regional Office

cc: PWS Sanitary Survey File (*stamped "File Copy"*)  
DEP-DWP-Boston (*Cover letter only*)  
Townsend Board of Health  
DEP-DWP-CERO- DWP Correspondence File (*cover letter only*)  
Cheryl Poirier-CERO/BRP Enforcement Coordinator  
Mike Maher-CERO/Office of Enforcement  
DWP Enforcement Book

File Name: Y:\DWP Archive\CERO\Townsend-2299000-SS-2010-11-23

W:\WS\DW Program Files\CCE\Electronic Sanitary Surveys\Final\Townsend-2299000-SS-2010-11-23

## Public Water System Sanitary Survey

CITY: TOWNSEND  
PWSID: 2299000  
PWS NAME: TOWNSEND WATER  
DEPARTMENT

Survey Date:	October 5, 2010	Report Date:	November 23, 2010
Surveyor:	Kristin Divris	Affiliation:	MassDEP-BRP-DWP
Person Interviewed:	Paul Rafuse	Title:	Superintendent

### **PUBLIC WATER SUPPLIERS:**

Attached is a Sanitary Survey Report for the above referenced sanitary survey site visit.

At the end of the report is a Water System Compliance Plan which consists of the following (checked items only):

- ☒ Table A - Summary of violations and Notice of Noncompliance (if violations were observed during the survey)
- ☒ Table B - Summary of deficiencies and required corrective actions
- ☒ Table C - Recommendations
- ☒ Water supplier response and certification.

**Within 30 days of receipt of this inspection report, you must complete and submit the response form if your system has TABLE A-Violations and/or TABLE B-Deficiencies. Attach a copy of each completed table 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))**

## **SYSTEM DESCRIPTION:**

The Townsend Water Department (TWD) is a community public water system (PWS) located in the Town of Townsend, Massachusetts. At the time of the last sanitary survey, performed on May 30, 2007, the TWD had only two sources including Well 01G - Main Street Tubular Wellfield, and Well 02G - Cross Street Gravel Packed Well #2, one booster station, and two water storage tanks. These pump stations and tanks continue to operate; however, significant changes to the system have occurred since then including the addition of a new source, Well 03G - Harbor Trace Gravel Packed Well, and the purchase of the Witches Brook Water System, which includes two additional gravel packed wells. TWD is classified as a grade-2 distribution system while all pump stations are classified as grade-1 treatment.

Now serving a drinking water population of approximately 7,100 persons per day, the service area has 1,929 service connections consisting of 1,828 residential connections, 64 commercial/business, 3 agricultural, 8 industrial, and 26 municipal/institutional/non-profits connections. It is important to note for purposes of determining residential gallons per capita day (RGCD), that there are 14 residential connections that account for 286 additional units within multi-family residences. The PWS uses an average of 0.589 million gallons per day (MGD), and maintains an interconnection on Proctor Road with the Pepperell Water Department (PWS ID# 2232000). All sources, service connections and the interconnection are metered, while system pressure of 50-100 psi is maintained by the two water storage tanks and the one booster station.

## **SOURCES & TREATMENT**

Well 01G - Main St. (2299000-01G) is a vacuum priming tubular wellfield consisting of 52, two and a half-inch diameter wells that range in depth from 30 to 60 feet, with approximately 50% of the wells unscreened. Constructed in 1934, and approved by MassDEP on April 3, 1996, the PWS originated from this source and historically was used as the TWD main office. The priming system is used to expel excess air as necessary, while two pumps are maintained on-site for withdrawal of water. The first pump, also the primary pump, is a 50 horsepower (HP) centrifugal pump that was rebuilt by Maher Drilling & Pump Services in 2009 due to a broken shaft sleeve. A second, 60 HP centrifugal pump remains in place and is used only for emergency situations; however, since the addition of the new sources to the system, it is unlikely to be used as the station now pumps approximately four to five hours a day, and occasionally is not in use at all. A 6.25 HP Kohler vacuum pump is also kept on-site at this location for stand-by use, along with some additional equipment storage including paints and cleaning materials. The Well 01G-Main St. pumping station also serves as the fully automated treatment facility (2299000-01T) for corrosion control by chemical injection of Sodium Hydroxide (NaOH) for pH adjustment. The feed system for the 25% NaOH consists of a 1,600 gallon bulk storage tank with secondary containment, LMI Microprocessor, electronic pulse, chemical dosing pump, and a pH analyzer for continuous pH monitoring. This station is equipped with emergency disinfection using sodium hypochlorite (NaOCl) and also serves as the primary center for the PWS's alarm system network. In addition to monitoring alarm conditions at the Main St. Station, the main telemetry panel also receives alarm transmissions from the Cross Street Station

(2299000-02T) and both water storage tanks. The Main St. Station then transmits a signal to the Police dispatch regarding the particular alarm, at which point the Police dispatcher contacts the PWS offices during business hours, or PWS personnel directly. The Main St. Station alarms in place include power failure and chemical system failure of both 01T and 02T, and high and low tank levels for each storage tank. The system is designed such that the chemical feed pumps are interlocked with the well pump, and will shut down in the event of a high pH alarm and then manually restarted. However, during non-emergency alarms, such as low pH, the chemical feed pumps will shut down while the water pumps continue to operate. This station is equipped with a Red Seal, battery-powered, emergency generator as well.

Well 02G – Cross St. (2299000-02G) is a 24-inch diameter gravel packed well drilled to a depth of 43-feet with 38-feet of casing and a five foot long, 24-inch-diameter screen. Constructed in 1980, and approved by MassDEP on April 3, 2006, the well has an approved pumping rate of 305 gallons per minute (gpm), and normally pumps at about 250 gpm. Water is drawn from the well by a 40 HP vertical turbine pump, which equipped with a Parco valve to control the amount of water pumped, is also treated within the pumping station. The Well 02G – Cross St. Treatment Facility (2299000-02T) treats for corrosion control by chemical injection of NaOH for pH adjustment. The feed system for the 25% NaOH consists of a 1,400 gallon bulk storage tank with secondary containment, LMI electronic pulse chemical dosing pump and a pH analyzer for continuous pH monitoring. The chemical feed pumps operate identical to the Main St. station. This station is also equipped with emergency disinfection using sodium hypochlorite (NaOCl) and a Rockford, battery-powered, emergency generator.

Well 03G – Harbor Trace (2299000-03G) is a 24" diameter gravel packed well drilled to a depth of 60-feet with 50-feet of casing and a ten foot long screen. Constructed in 2006 and approved under New Source Approval (NSA) on November 2, 2007, the well has an approved pumping rate of 694 gpm or 1.0 million gallons per day (MGD). Water is drawn from the well by a 75 HP vertical turbine pump and also treated within the pumping station. The Well 03G – Harbor Trace pumping station also serves as the fully automated water treatment facility (2299000-03T) for corrosion control by chemical injection of NaOH for pH adjustment and for disinfection with NaOCl; however, chemical injection of NaOCl is currently offline and not required. The feed system for the 25% NaOH consists of a 1,750 gallon bulk storage tank and 120 gallon day tank with secondary containment, two LMI electronic pulse chemical dosing pumps (one as backup) and a Walchem pH analyzer for continuous pH monitoring. The feed system for the 12.5% NaOCl consists of a 550 gallon bulk storage tank and 65 gallon day tank with secondary containment, two LMI electronic pulse chemical dosing pumps (one as backup) and a Scientific, Inc. in-line chlorine analyzer for continuous monitoring as necessary. The chemical feed pumps at this site are also interlocked with the well pump; however the design here shuts down both the chemical feed and main pump on either a high or low pH alarm. The development of the Harbor Trace WTF also coincided with MassDEP's Energy Pilot Study and resulted in TWD being chosen as one of 13 water and wastewater systems to participate in an evaluation of energy efficiency measures and renewable energy generation. This led to the receipt of federal stimulus funds used for the installation of a 40 kilowatt (kW), solar photovoltaic, ground-mounted system installed at the site. These solar panels, with Solecra inverters, generate just over half the power required for the pumping station; however, the station

is also further equipped with a back-up, diesel powered generator for emergencies.

Well 04G – Witches Brook Well #1 (2299000-04G) is a gravel packed well drilled to a depth of 60 feet located off of Ash Street. Purchased from the Witches Brook Water System in July 2007, Well 04G along with a second Witches Brook Water System source, were connected to the TWD on August 27, 2007. Water is drawn from the well by a 50 HP vertical turbine pump with variable frequency drive (VFD), which was last replaced in September 2006. The pump station also serves as the water treatment facility (2299000-04T) by chemical injection of 25% NaOH for corrosion control. The NaOH feed system consists of a 500 gallon bulk storage tank, LMI electronic pulse chemical dosing pump and a GLI Model 53 pH analyzer for continuous pH monitoring. The autodialed alarm system is designed for low and high pH, low and high chemical tank levels, flooding, and connected to the emergency eye wash as well. Although only one chemical dosing pump was on-site at this location, the system is equipped for another as a backup. Also subject to vandalism historically, the TWD installed a security surveillance camera system in 2009 to monitor activity around the area of both Wells 04G and 05G.

Well 05G – Witches Brook Well #2 (2299000-05G) was also purchased by TWD, along with Well 04G, and is a gravel packed well drilled to a depth of 58 feet located due east of Well 04G. At the time of the inspection, the source was inactive (since May 21, 2010) and most of the components within the pump station had been dismantled. TWD is using some of the aforementioned federal stimulus funds to also pay for the replacement and upgrade of a pump, motor and VFD at this pump station, where construction is currently underway. Additionally, the pump station will be further equipped with a new control panel, transfer switch, and alarm system. The pump station also serves as the water treatment facility (2299000-05T) by chemical injection of 25% NaOH for corrosion control. The emergency, battery-powered generator housed within this pump station, serves as back-up power for both Wells 04G and 05G.

### **BOOSTER STATION**

There is one booster station within the PWS known as the West Meadow Booster Station, which is located off of West Meadow Road. The booster station is equipped with two, 20 HP Grundfos booster pumps, one, 7.5 HP Grundfos booster pump, and an Amtrol Therm-X-Trol hydropneumatic tank, which maintains adequate pressure to the nearby 42-46 unit condominium development. The booster station is equipped with a battery-powered Kohler Power Systems generator for emergencies. A transfer switch will automatically start the generator if there is a pump failure.

### **WATER STORAGE FACILITIES**

TWD maintains two water storage tanks; the Highland Street Storage Tank and the Fitchburg Road Storage Tank. Constructed in 1978, the Highland St. Tank is a 1-million gallon concrete storage tank equipped with an altitude valve. The tank has a smooth nose tap for bacteria sampling located in an adjacent, locked vault. Constructed in 1934, the Fitchburg Rd. Tank is a 500,000 gallon riveted steel standpipe, also containing a smooth nose tap for bacteria sampling located in an adjacent locked vault. Both storage tanks have single inlet/outlet pipes and are equipped with level

transmitters and high/low level alarms connected to the telemetering system.

## ADMINISTRATION:

### General System Information

					Is this correct?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
PWSID	PWS Class	Season Start	Season End	Population Served (Summer)	Population (Winter)	Service Connections	# Distribution Systems
2299000	COM	101	1231	7100	7100	1929	1

### Facility Address:

								Is this correct?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Name	Address	Town	Zip	EEmail	Phone#	Fax#	Comments			
TOWNSEND WATER DEPARTMENT	540 MAIN ST	TOWNSEND	01474	paulr@townsendwater.com	(978) 597-2212	(978) 597-5611	PURCHASED WITCHES BROOK WC #2299001 JUL 2007; COMBINED SYSTEM JAN 2008			

### Mailing Address:

						Is this correct?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Name	Mailing Address	Address (2)	Town	State	Zip			
TOWNSEND WATER DEPARTMENT	P.O. BOX 17		TOWNSEND	MA	01469			

### Contact Information

										Is this correct?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
PWSID#	First	MI	Last	Address	Town	State	Zip	Work Phone#	Home Phone#	Primary Contact?		
2299000	PAUL	L	RAFUSE	P.O. BOX 17	TOWNSEND	MA	01469	9785972212		Y		

### Comments:

The population served for the TWD was entered as 7,721 both in historical Department records and within the 2009 electronic annual statistical report (eASR); however, TWD superintendent indicated during the inspection that the population served is 7,100.

**Certified Operator Information:**

Is this correct? Yes ☒ No ☐

PWSID	First	MI	Last	ADDRESS 1	TOWN	STATE	ZIP	WORK#	HOME#
2299000	PAUL	L	RAFUSE	P.O. BOX 17	TOWNSEND	MA	01469	978 5972212	

PWSID	First	MI	Last	POSITION	GRADE	LICENSE#	PRIMARY AFFILIATE
2299000	PAUL	L	RAFUSE	OPERATOR	3D/C2	7389/1797	Y
2299000	MICHAEL	D	MACEACHERN	OPERATOR	2D/1T	8785/8227	N
2299000	JAMES	D	BLANCHARD	OPERATOR	2D/1T-OIT	12217/22611	N

PWSID	MaxOfTREATMENT CLASS	POPULATION SERVED SUM	DISTRIBUTION CLASS
2299000	I-T	7100	II-D

PWSID	DISTRIBUTION CLASS	POPULATION SERVICED
2299000	II-D	7100

Are operator grades appropriate for system size and/or treatment type? Yes ☒ No ☐

Does the system have the correct staffing levels for the system size and grade? Yes ☒ No ☐

Is certified operator or a backup operator available for emergencies? Yes ☒ No ☐

**Comments:**

**OPERATION AND MAINTENANCE:**

Is there an adequate spare parts inventory? Yes ☒ No ☐

Is there an O & M Manual? Yes ☒ No ☐

Is there a preventative maintenance program? Yes ☒ No ☐

Are operational records collected appropriately? Yes ☐ No ☒

Are records properly maintained and available for review? Yes ☒ No ☐

Frequency of meter readings? Daily ☒ Monthly ☐ Other ☐

How frequently are meters calibrated? Annually

- The Department recommends that source meters be calibrated on an annual basis.

Are emergency telephone numbers posted? Yes ☒ No ☐

Is there a plan / procedure for emergency repairs and spare parts? Yes ☒ No ☐



Who performs emergency repairs? Maier Drilling & Pump Services out of North Reading, MA. & Weston & Sampson Services out of Peabody, MA.

**Comments:**

Not all operational records were collected appropriately at each of the pump stations. The Pump Station Logs, which include actions such as clean filter, exercise valves, calibrate pH analyzer, master meter calibration and grease pump motor among others, were not always fully completed. Superintendent Rafuse indicated during the inspection that he was aware the staff was not always filling the logs out correctly and was attempting to rectify the oversight.

Emergency telephone numbers were posted at all locations with the exception of the Harbor Trace Water Treatment Facility. The operator was informed during the inspection that he must post a list of emergency contacts at the Harbor Trace WTF. In addition, the neutral pH buffer solution for calibration of the pH analyzer at Harbor Trace was past expiration.

The Emergency Response Checklist was on file with MassDEP-CERO, and Superintendent Rafuse provided an additional copy of the checklist during the inspection. However, because there was no hard copy of Townsend's Emergency Response Plan (ERP) as only a digital version was available, the checklist could not be compared to the ERP for accuracy. The Superintendent was informed during the inspection that a hard copy of the ERP must always be readily available.

TWD also signed an agreement in March 2009 joining them with the Massachusetts Water/Wastewater Agency Response Network also known as the WARN Program. Membership within this network will provide TWD with assistance that may be necessary during any number of emergency situations.

**TREATMENT - GENERAL:**

*Active treatment plant information listed within Department records:*

PLNT/SRCE ID	PLNT/SRCE NAME	PLNT AVAIL	PLANT_CAPACITY(MGD)	TREATMENT_CLASS
2299000-01T	MAIN STREET WELL #1 TREATMENT PLANT	ACTIVE		I-T
2299000-02T	CROSS STREET WELL #2 TREATMENT PLANT	ACTIVE		I-T
2299000-03T	HARBOR TRACE WTF	ACTIVE	1	I-T
2299000-04T	WITCHES BROOK WELL #1 TREATMENT PLANT	ACTIVE		I-T
2299000-05T	WITCHES BROOK WELL #2 TREATMENT PLANT	ACTIVE		I-T

Active treatment process information listed within Department records:

PLNT/SRCE ID	PLNT/SRCE NAME	PLNT AVAIL	OBJECTIVE	PROCESS	CHEMICAL NAME	COMMENT
2299000-01T	MAIN STREET WELL #1 TREATMENT PLANT	ACTIVE	CORROSION CONTROL	PH ADJUSTMENT	Sodium Hydroxide	
2299000-02T	CROSS STREET WELL #2 TREATMENT PLANT	ACTIVE	CORROSION CONTROL	PH ADJUSTMENT	Sodium Hydroxide	
2299000-03T	HARBOR TRACE WTF	ACTIVE	CORROSION CONTROL	PH ADJUSTMENT	Sodium Hydroxide	
2299000-04T	WITCHES BROOK WELL #1 TREATMENT PLANT	ACTIVE	CORROSION CONTROL	PH ADJUSTMENT	Sodium Hydroxide	PURCHASED FROM WITCHES BROOK WTR CO
2299000-05T	WITCHES BROOK WELL #2 TREATMENT PLANT	ACTIVE	CORROSION CONTROL	PH ADJUSTMENT	Sodium Hydroxide	PURCHASED FROM WITCHES BROOK WTR CO

No Treatment ☐ Treatment listed above is correct ☒ Unapproved treatment installed ☐

• Unapproved treatment is subject to MassDEP permit requirements

If a sediment filter is being utilized how often is the filter replaced? Not applicable

Is information from the manufacturer available for reference? Yes ☒ No ☐ N/A ☐

Is chemical storage, containment, and safety equipment adequate? Yes ☐ No ☒ N/A ☐

Is equipment properly maintained? Yes ☒ No ☐ N/A ☐

Are alarms tested and adequate? Yes ☒ No ☐ N/A ☐

Are chemical treatment forms submitted monthly as required? Yes ☐ No ☒ N/A ☐

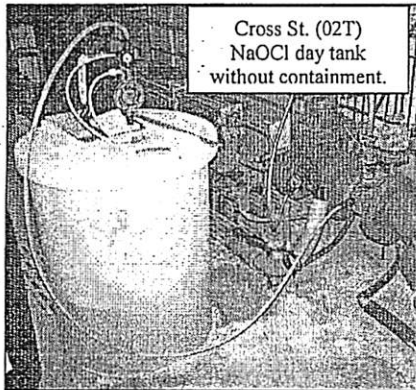
Are they completed properly? Yes ☐ No ☒ N/A ☐

Is operator familiar with the treatment system and its operation? Yes ☒ No ☐ N/A ☐

Comments:

Historically, all sources have been treated for pH adjustment using Potassium Hydroxide (KOH); however, the PWS gained approval from the Department on May 27, 2009 to convert all KOH feed systems over to NaOH, thereby gaining significant savings due to the increasing costs associated with KOH. All NaOH storage tanks also possessed adequate containment, but as a critical chemical, all should be coupled with day tanks that meet the

Guidelines section 6.1.11.3. At the time of the inspection, only the Harbor Trace WTF utilized a day tank for NaOH, and while one was on-site at the Main St. treatment facility, it was not connected to the treatment system.



The bulk disinfection tank at Harbor Trace WTF was equipped with a day tank, which also had adequate secondary containment. In addition, two sites, both Main St. and Cross St., contained day tanks for emergency disinfection, but they did not have secondary containment. Considering that the day tanks were in place for emergency disinfection, secondary containment was not immediately available; however, all liquid chemical tanks must be provided with containment of not less than 110 percent of the total volume of the tank.

Also, all vents for liquid chemical tanks should both terminate in a manner to prevent entrance of contaminants (i.e., down turned position), and be covered with a 24-mesh corrosion resistant screen. All pump stations, with the exception of the Main St. station, had vents for the bulk NaOH tanks terminating outside the building. All were properly screened except for the two Witches Brook Wells 04G and 05G. The Main St. station bulk NaOH tank has only a single vent that serves as the overflow as well. Although downturned, the vent/overflow is not properly screened and discharges well above the 12 to 24 inches above the containment area floor (approximately six feet above the floor), which could cause excessive splashing and dispersing outside of the containment area. All other bulk chemical storage tank overflows for the entire system must be screened to minimize the potential for contamination.

All pumping stations were equipped with the required protective equipment including eye washing devices, safety deluge showers, gloves, aprons and splash goggles or face masks. Only the Witches Brook Well #1 (04G) pumping station did not contain the gloves, apron and splash mask on-site; however it did contain a safety shower.

All alarms are tested quarterly as required; however, there is no log documenting the testing and no written testing protocol, which is also required. The ERP checklist does indicate that procedures for testing and maintaining all facility communications and alarm systems has been developed and is on page 16 of the ERP; however, the system should maintain a log indicating the type of alarm, testing date and results either onsite at each of the pump stations, or available at the water department offices.

Although the PWS treats for corrosion control at all of the sources, chemical treatment forms have not been submitted since March 2007. Chemical treatment reports must be submitted monthly. The superintendent was notified of the missing reports shortly after the sanitary survey and planned to immediately forward copies of all monthly reports.

### SAMPLING:

PWSID	NO_BACTERIA SAMPLES	BACTERIA SAMPLE_FREQ	NO_WINTER BACT SAMPLES	WINTER_BACT SAMPLE_FREQ
2299000	19	MONTH	19	MONTH

Does the system have an approved Total Coliform Sampling Plan? Yes ☒ No ☐

Is the system taking the correct number of bacteria samples? Yes ☒ No ☐

Is the system using appropriate coliform sample sites? Yes ☒ No ☐

Is the system using appropriate source sample sites? Yes ☒ No ☐

Are raw water sample taps available for all sources? Yes ☒ No ☐

### Comments:

TWD has an approved Coliform Sampling Plan dated 10/27/2008 that includes nine routine distribution sample sites (RS), five raw water (RW) sampling sites (before treatment), and five plant tap (PT) sampling sites (after treatment). Under the Total Coliform Rule (TCR), a population of 6,601-8,500 requires a minimum of 9 distribution samples per month. TWD is meeting this requirement, as well as including the system's two water storage tanks as RS sampling locations, which is also a requirement of the TCR.

The most recent TWD map that includes the total coliform sample sites is dated April 2008.

### STORAGE:

#### Maintenance and Condition

PWSID	STORAGE TANK NAME	STORAGE TYPE	MATERIAL	STORAGE CAPACITY	Last Inspection Date	Last Cleaned Date	Structural Integrity- Condition
2299000	HIGHLAND ST. STORAGE TANK #1	GROUND LEVEL STORAGE TANK	CONCRETE	1	8/20/2007	8/20/2007	GOOD
2299000	FITCHBURG RD. STORAGE TANK #2	GROUND LEVEL STORAGE TANK	STEEL	0.5	8/20/2007	8/20/2007	GOOD

- MassDEP recommends storage tanks be inspected and cleaned every 5 years.

**Protection and Safety**

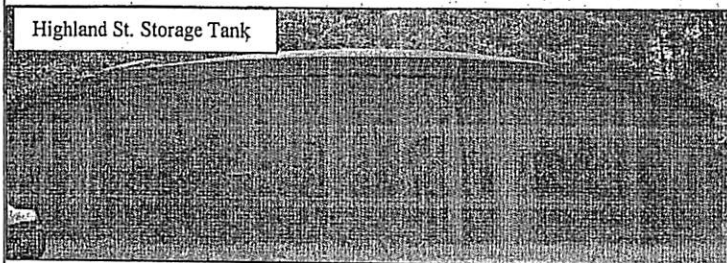
STORAGE TANK	Proper Overflow?	Covered/ Locked?	Vented/ Screened?	Sample Tap?	High/Low Level alarms?	By-pass for Repair/ Cleaning	Protected from Flooding (>50ft)?	Protected from Runoff?	Fenced or otherwise protected?
HIGHLAND ST. STORAGE TANK #1	N	Y	Y	Y	Y	Y	Y	Y	N
FITCHBURG RD. STORAGE TANK #2	Y	Y	Y	Y	Y	Y	Y	Y	Y

The storage tanks have nearby injection ports to allow emergency disinfection. Yes ☐ No ☒

The storage tanks are adequately protected against vandalism. Yes ☐ No ☒

### Comments:

Both water storage tanks were inspected and cleaned by Underwater Solutions Inc. on August 20, 2007. Copies of the two inspection reports were submitted to MassDEP on September 22, 2010. The entire exterior and interior of both storage tanks and the components were inspected and found to be in good condition. Although neither tank is currently equipped with injection ports for emergency disinfection, the Superintendent noted that they could easily tap into the main outlet pipe for the Fitchburg Rd. tank. Alternatively, the system finds it easier to directly disinfect the Highland St. tank.



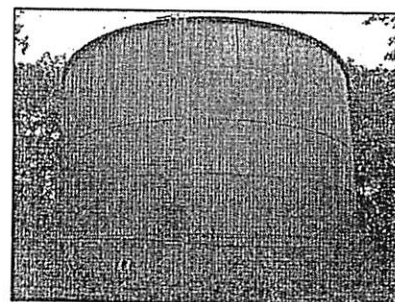
According to the inspection report from Underwater Solutions Inc., the Highland St. Storage Tank #1 was found to have several non-structural tight surface cracks at all elevations of the exterior surfaces, but no spall or voiding was found and no indication of exposed

reinforcement wires was seen. In addition, all roof dome surfaces were sound and no floor or overhead surfaces were found with any failures. The report recommended re-inspection and cleaning of the facility in accordance with AWWA standards. It should be noted that the overflow pipe for this tank was found without any screen and partially



buried, which is a Groundwater Rule (GWR) Significant Deficiency. A notice of significant deficiency (NSD) was sent out to the system on October 8, 2010 requiring corrective action be taken on the overflow pipe. This tank also has no security fencing; however, the last sanitary survey report indicated the Fitchburg Rd. Storage Tank lacked security fencing and required installation of such. This may have led the TWD to some level of confusion considering the Fitchburg Rd. Storage Tank has adequate security fencing in place.

According to the second inspection report from Underwater Solutions Inc., the Fitchburg Rd. Storage Tank #2, pictured at right, was found to have a good deal of mild corrosion of the steel surface within the lowest 25' of the exterior wall surfaces due to coating chips caused by vandals striking the walls with objects. Numerous coating chips on the roof panel surfaces were also found; however, there was no failure of the steel found on these surfaces. All components affiliated with the structure, and interior surfaces were listed in good condition. The report recommended that consideration be given to recoating the exterior surfaces of the tank in an effort to halt further corrosion and preserve the integrity of the steel.



Finally, TWD had all monthly storage tank inspection logs on file as required.

### PUMPING STATIONS:

PWSID	PUMP STATION NAME	# OF PUMPS	LOCATION	WATER TYPE	GPM	EMERG POWER?	MOTOR HP	MOTOR TYPE
2299000	HARBOR TRACE GP WELL PUMP	1			700	Y	100	V.TURBINE
2299000	TUBULAR WELL FIELD #1 PUMP	2	MAIN ST		500	Y	60	ELECTRIC
2299000	WITCHES BROOK WELL #1 PUMP	1		R	650	Y	40	ELECT VFD
2299000	WITCHES BROOK WELL #2 PUMP	1		R	703	Y	40	ELEC VFD
2299000	GRAVEL PACKED WELL #2 PUMP	1	OFF CROSS ST		200	Y	0	ELECTRIC

Are all pump stations recorded in WQTS?

Yes ☒ No ☐

Are pump stations adequately maintained?

Yes ☒ No ☐

Comments:

### DISTRIBUTION

Has the system submitted a distribution map to MassDEP

Yes ☒ No ☐

Are valve locations known or identified?

Yes ☒ No ☐

How many distribution systems are there? One

Is adequate pressure being maintained? (20-60 psi)

Yes ☒ No ☐

The distribution system has 20 dead ends which are flushed Biannually

List distribution system weaknesses or problems Four streets with AC pipe

Date of last leak detection survey: 9/2/2005 Percent of system surveyed?: 100%

Are distribution valves exercised regularly? Yes ☒ Frequency? Biannually No ☐

Is there a hydrant maintenance program?

Yes ☒ No ☐

Is there an adequate flushing program?

Yes ☒ No ☐

- The Department recommends that the distribution system be flushed twice a year.

**Comments:**

The four streets with AC pipe totaling approximately 1.5 miles include Adams Road, Joyce Street, Spaulding Street and Old Meeting House Road. In addition, the distribution system contains 352 hydrants, and there is a program in place to replace at least some of the older hydrants each year. The entire distribution system is metered, while meter readings and billings occur twice per year. The 500 Witch's Brook residences that were completely connected to the TWD distribution system have radio-read meters. The remainder of the distribution system are manually read by the operators using touch-read devices.

The system has a unidirectional flushing program that is broken out into four zones, with two zones completed each year. Therefore, the entire distribution system is completely flushed every two years. The Superintendent noted that the system rarely receives customer complaints, but will receive complaints if emergency disinfection is online. Otherwise, approximately ten calls per year may occur due to various issues.

**CROSS-CONNECTIONS / BACKFLOW PREVENTION:**

PWSID	DEP APPROVED X-CONN PLAN?	X-CONN SURVEY CONDUCTED?
2299000	Y	Y

Does the system annually report its cross connection activities of the previous year within its 'Annual Statistical Report'?

Yes ☒ No ☐

Does the system have hose bibs on all threaded faucets?

Yes ☒ No ☐

If the system has any testable devices (RPBP or DCVA) – Does the system keep an inventory list of the devices, including type of device, location and device test inspection dates?

Yes ☐ No ☒

Has the system undergone any modifications since the last cross connection survey?

Yes ☒ No ☐

Date of Last Survey: 8/2/1999

**Comments:**



Townsend developed a Cross Connection Control Program (CCCP) "Implementation Plan" in August 1991 requesting "delegation authority to perform plan reviews and initial inspections." The TWD planned to begin surveying by the end of 1991 with all surveying completed by the fall of 1992. On September 9, 1991 MassDEP granted that authority subject to several conditions including the requirement of the TWD to notify the owner or occupant of each premises where it finds an existing unprotected or unpermitted cross connection using the following MassDEP approved forms; MassDEP Violation Notice, MassDEP Cross Connection Regulations-Highlights, MassDEP's Backflow Prevention Device Design Data Sheet and a list of approved Backflow Prevention Devices. In addition, TWD must report the date of each survey, number of violations found, number of new devices installed, and the type of premises surveyed each year in the ASR.

The last sanitary survey inspection report conducted in 2007 noted the date of the last cross connection survey as 1992; however, the most recent ASR indicates the date of 8/2/1999, which was confirmed with the Superintendent. In addition, as noted in the CCCP plan, TWD maintains a third party contract to implement the cross connection program. Mr. Gary Odoardi (MassDEP Certification ID # 2016) of Water Service Associates is responsible to the TWD for providing facility surveys, device testing, device installation plan approvals and program management.

TWD has a total of 50 reduced pressure backflow preventers (RPBP) of which 13 are seasonal, and a total of 28 double check valve assembly (DCVA) devices; all are located in commercial facilities. Testing data for the devices, which were noted within the 2009 ASR, equate to the required number of tests for the year; however, TWD is currently unable to provide an immediate, comprehensive list of all devices, locations and testing dates and results. TWD does maintain a complete file that was available for review, which contained all of the backflow prevention device inspection and maintenance report forms, along with the letters submitted for device failures, but they must also maintain a list of all registered cross connections that minimally contain the owner/business name, cross connection ID#, type of protection, brand, model, serial # and exact location within the facility. A discussion with the Superintendent regarding this need reviewed how it would make assessment of the system's devices and testing schedules easier to manage, particularly considering any modifications to the system such as the addition of the Witches Brook Water System.

The local Zoning Board also provides a mandatory referral to the TWD regarding any new use of a site and/or building so that TWD can assess any potential cross connection activities. And while the town does not have any bylaw limiting irrigation systems on past or new development, TWD does maintain records of customers with irrigation systems mainly for billing disputes.

### SOURCES:

PWSID	# Sources	% Ground	%Purch Ground	% SURFACE	%Purch Surface	YEAR	Avg Daily Demand (MGD)	Max Daily Demand (MG)	Max Monthly Demand (MG)
2299000	5	100	0	0	0	2008	0.5891	1.415	24.564
2299000	5	100	0	0	0	2007	0.4240	0.87	17.3
2299000	5	100	0	0	0	2006	0.4060	0.765	17.011
2299000	5	100	0	0	0	2005	0.4125	0.812	16.503

### Groundwater Sources:

#### Well Construction Information

Is this correct? Yes ☒ No ☐

Source ID	Source Name	Location	Availability	Well Type	Depth	Pump Setting	Comments
2299000-01G	MAIN STREET TUBULAR WELL FIELD #1	512 MAIN ST	ACTIVE	TUB	30-60	0	52 - 2.5" POINT WELLS
2299000-02G	CROSS STREET GRAVEL PACKED WELL #2	OFF CROSS ST	ACTIVE	GP	43	0	
2299000-03G	HARBOR TRACE GP WELL	TOWNSEND	ACTIVE	GP	60	0	NSA APPROVED RATE = 1 MGD, 400 FT ZONE I
2299000-04G	WITCHES BROOK WELL #1	14 ASH ST	ACTIVE	GP	60	0	PURCHASED FROM WITCHES BROOK 1/2008
2299000-05G	WITCHES BROOK WELL #2	14 ASH ST	ACTIVE	GP	58	0	PURCHASED FROM WITCHES BROOK 1/2008

#### Well Inspection

SOURCE ID	Casing diam (in)	Casing Height Abv Grade (in)	In Pit (Y/N)?	Well House?	Vent Screened?	Seasonal?	Condition?	Year Installed
2299000-01G	2.5	18	N	N	Y	N	GOOD	1934 & 1950
2299000-02G	24	18	N	Y	Y	N	GOOD	1980
2299000-03G	24	18	N	Y	Y	N	GOOD	2007
2299000-04G	24	18	N	Y	Y	N	GOOD	Unknown
2299000-05G	24	18	N	Y	Y	N	GOOD	Unknown

- Are all wells recorded in WQTS? Yes ☒ No ☐
- Are all of the wells listed on the sampling schedule? Yes ☒ No ☐
- Are manifolded wells reflected accurately on the schedule? Yes ☐ No ☐ N/A ☒
- Are all wells > 100 ft from the nearest surface water? (NC systems) Yes ☐ No ☒
- Is the quantity of water supply adequate? Yes ☒ No ☐
- Do any sources run dry? Yes ☐ No ☒
- If yes, during which periods and how is it handled? \_\_\_\_\_

**Comments:**

The Main Street TWF (01G) was partially developed near a stream and adjacent wetlands; however, the system underwent microscopic particulate analysis to determine the influence on groundwater from surface water and results indicated a low risk.

**Source Protection:**

**SWAP Database Information**

Source ID	Approved Volume (MGD)	Zone I Owned?	Zone I Method	Zone I (ft)	Pollution Sources in Zone I
2299000-01G	0.579	N	Z - ZONE II RATE	250	STREAM, SEPTIC SYSTEM FOR PUMP HOUSE SINK
2299000-02G	0.439	Y	Z - ZONE II RATE	400	
2299000-03G	1	Y		400	NONE, NSA APPROVED
2299000-04G	0.32	Y	Z - ZONE II RATE	400	ROAD, STREAM, STORAGE AREA (LUMBER), VEHICULAR SERV (INACT)
2299000-05G	0.39	Y	Z - ZONE II RATE	400	ROAD, STREAM, STORAGE AREA (LUMBER), VEHICULAR SERV (INACT)

- Is there excessive use of fertilizers or chemicals in Zone I? Yes ☐ No ☒
- Are there any open floor drains in the facility? Yes ☒ No ☐
- Are there any known or potential, sources of pollution observed in the Zone I or IWPA (other than those listed above)? Yes ☐ No ☒
- Is there an awareness of threats and an attempt to minimize them? Yes ☒ No ☐
- Is protection area posted? Yes ☒ No ☐
- Are source water protection measures adequate? Yes ☒ No ☐

**Comments:**

The Main Street TWF Pumping Station (01T) does have a floor drain located in what was the bathroom of the former main office. The floor drain is connected to the septic system.

The Cross Street Pumping Station (02T) does continue to maintain an underground propane tank, which MassDEP required be brought above ground as a result of a 1991 sanitary survey. However, MassDEP subsequently allowed the underground propane tank and provided TWD with a "Propane Fuel Management Guidance Sheet" that offered recommended storage practices to help keep propane a preferred alternative to petroleum. Further questions regarding the underground storage tank (UST) should be directed to the UST program.

TWD also has a ground water protection district bylaw, which was adopted on April 28, 1998.

## **WATER QUALITY**

**Comments:**

In 2004, MassDEP ordered TWD to submit a treatment permit for the installation of permanent disinfection at the Cross St. Well (02G) due to three MCL violations of the TCR in 12 months. Subsequent MPA testing on the source revealed there was low risk of surface water contamination, while further investigation of the contamination was attributed to resulting beaver activity in the surrounding area. After corrective action was taken to eliminate the beaver issue, the system continued to disinfect and collect raw water bacteria samples as required. There were no further bacteria detections in the source through 2007 and TWD formally requested approval to discontinue the use of disinfection. MassDEP verbally granted the approval.

The Harbor Trace Well (03G) was increased to quarterly monitoring for Volatile Organic Compounds (VOC) after a detection of Xylenes (total) at 1.5 ug/L in December 2007. The Maximum Contaminant Level (MCL) for xylenes is 10,000 ug/L. Since that time, the source has had no further xylenes detections; however, it has had continued, low level detections of methyl tertiary butyl ether (MTBE), which is an unregulated VOC with a MassDEP ORSG (Office of Research and Standards) limit of 0.07 mg/L or 70 ug/L. MTBE detections have ranged from 0.51 ug/L to 0.74 ug/L. As there have been no additional VOC detections for this source, it is recommended that VOC monitoring be reduced to an annual frequency.

Both Witches Brook Wells (04G & 05G) have also been on increased VOC monitoring. Well 04G has been on quarterly monitoring due to an initial detection of 1,1,1-trichloroethane at 0.52 ug/L in 2008. Since that time, the source has had no further detections of 1,1,1-trichloroethane; however it has had three, low level detections of MTBE ranging from 0.54 ug/L to 0.9 ug/L. Well 05G has had one detection of trichloroethylene at 0.64 ug/L and three detections of tetrachloroethylene ranging from 0.6 ug/L to 0.62 ug/L. The MCL for both regulated VOCs is 5 ug/L. As these detections have continued to be reliably and consistently below the MCL, it is recommended that VOC monitoring be reduced to an annual frequency.

## OTHER ISSUES OBSERVED:

Upon arrival for the inspection, the Superintendent was troubleshooting a calibration issue with the pH analyzer at the Harbor Trace WTP. The alarm system is designed to shut down both the chemical feed pumps and the well pump during a low or high pH; however, both pumps were starting back up when the alarm was acknowledged remotely before the pH was at an acceptable level.

## PRIOR OUTSTANDING ACTIONS

### Enforcement Actions

PWSID	ENF ISSUED	ENF TYPE	ENF#	ENF COMMENTS	MILESTONE ACTION	ACTION DEADLINE	ENF COMPLETE
2299000	12/21/2007	NON	075D081	SAN- OUTSTANDING FROM PRIOR INSPECTION	SUBMIT COPY OF MASTER PLAN & CIP	2/8/2008	
2299000	8/26/2010	NON	105D544	M&R 03G - PERCHLORATE - APR 2010	POST & SUBMIT PN & CERT. FORM	9/27/2010	
2299000	8/26/2010	NON	105D544	M&R 03G - PERCHLORATE - APR 2010	COLLECT & SUBMIT CLO4 RESULT	10/10/2010	

### Inspection Actions

PWSID	INS DATE	DEP STAFF	INS TYPE	INS COMMENTS	ACTION DEADLINE	CORRECTIVE ACTION	ACTION COMPLETE DATE
2299000	5/30/2007	GATES	SAN	TABLE- VIOLATIONS (SEE NON-CE- 07-081) TABLE B DEFICIENCIES SEE BELOW	2/8/2008	SUBMIT UPDATED CROSS CON PLAN	
2299000	5/16/2002	AQUINO	CCE	TABLES B (DEFICIENCIES); NOTE: MAIN ST ZONE I NOT OWNED COMPLETELY	7/1/2005	MASTER PLAN & CAPITAL IMPROVEMENT PLAN	

## SUMMARY OF VIOLATIONS AND NOTICE OF NONCOMPLIANCE NON-CE-10-5D145

**Table A – Violations**

Please note that this document is also a Notice of Noncompliance (NON) pursuant to M.G.L. c.21A, §16 and 310 C.M.R. 5.00. Within 30 days of receipt of the NON and inspection report, you must fill-in the corrected date(s) and submit this form to MassDEP and the attached SANITARY SURVEY COMPLIANCE PLAN RESPONSE FORM, including all applicable attachments. If the time required to complete the correction is greater than 3 months, submit quarterly progress reports and provide an anticipated completion date.

	T/F/M	Citation	TABLE A - CORRECTIVE ACTION	GWR Significant Deficiency*	Action Due Date	Date Complete by PWS
1.	M	310 CMR 22.04 & Guidelines Chap. 6.1.3.6	All alarms and controls installed to prevent an overfeed or underfeed of a critical chemical (NaOH) shall be tested quarterly, unless otherwise required by MassDEP, and logs shall be maintained to record the test results. Although TWD tests all alarms on a quarterly basis, it must develop and maintain bound log books for all alarm testing. Submit to MassDEP certification that an alarm testing log and protocol on maintaining the log is developed. In addition, submit a written SOP detailing procedures for the manual (hand) operation of critical chemical feed pumps.	N	24-DEC-2010	
2.	M	310 CMR 22.15(4)	TWD has not submitted monthly chemical treatment reports since March 2007. Please submit all monthly chemical treatment reports for each source from April 2007 through October 2010.	N	24-DEC-2010	
3.	M	310 CMR 22.22	The TWD Cross Connection Control Program Plan (CCCCP) is from September 1991. The plan must be reviewed and revised as appropriate, including a complete list of devices as required in the corrective action below. Please submit a copy of the updated CCCCCP to MassDEP.	N	24-DEC-2010	
4.	T	310 CMR 22.22(3)	TWD maintains files of backflow prevention devices and testing; however, it does not have a comprehensive inventory of all devices that can be easily accessed for management of the CCCP. Please develop and submit to MassDEP a complete list of all cross connection devices with the system that includes at a minimum the following: testing schedule, type of device, CC ID#, brand, model, serial #, owner/business name, exact location within the facility, and availability of repair kit(s).	N	24-DEC-2010	
5.	M	310 CMR 22.04	TWD must submit a copy of the current Master Plan & Capital Improvement Plan to the MassDEP as required in the corrective action portion of the 2007 Sanitary Survey Report and in the corrective action portion of the 2002 Comprehensive Compliance Evaluation (CCE).	N	24-DEC-2010	
6.	M	310 CMR 22.04(13)(a)	TWD did not have a hard copy of the PWS Emergency Response Plan (ERP) readily available. Each water supplier must prepare and keep in an easily accessible location an ERP prepared in accordance with 310 CMR 22.04(13) and Massachusetts Drinking Water Guidelines and Policies for Public Water Supplies, Chapter 12 including Appendix O. Please do not submit a copy of the TWD ERP; ensure that a hard copy is on-site and readily accessible.	Y	Addressed Under Separate Cover	

**Table B - Deficiencies**

MassDEP has made note of several items that do not reflect good water system practice and, if left unresolved, could lead to problems that are more serious. Some of these items may be potential violations, and are summarized below. Due to the item's severity or importance MassDEP has included a required course of action with a compliance date.

	T/F/M	Citation	TABLE B - CORRECTIVE ACTION	GWR Significant Deficiency*	Action Due Date	Date Complete by PWS
1.	T	310 CMR 22.15 & Chapter 6 guidelines	TWD does not employ the use of day tanks in the sodium hydroxide chemical feed system at the Main St. Station (01T), the Cross St. Station (02T), or the Witches Brook Stations (04T & 05T). Please provide a plan and timeline for installation of day tanks for the sodium hydroxide at each facility.	N	24-JAN-2011	
2.	T	Chapter 6 Guidelines	All bulk chemical storage tank overflow pipes must be screened or otherwise protected to minimize the potential for contamination.	N	24-JAN-2011	
3.	T	Chapter 6 Guidelines	Air/Water relief valve discharge pipes located at both Witches Brook Wells (04G & 05G), and at the West Meadow Road Booster Station must be properly screened or otherwise protected to minimize the potential for contamination.	N	24-JAN-2011	
4.	T	310 CMR 22.04 & Chapter 8 Guidelines	A 24-mesh, non-corrodible screen must be installed on the overflow pipe at the Highland Road Storage Tank. Please submit photo documentation of completion.	Y	Addressed Under Separate Cover	
5.	T	310 CMR 22.04 & Chapter 8 Guidelines	The overflow pipe at the Highland Road Storage Tank should terminate 12-24 inches above the ground surface; however, the design of the overflow pipe does not permit this. Clear brush from immediate area surrounding the overflow pipe and ensure the pipe remains free from obstruction. Please submit photo documentation of work.	N	24-DEC-2010	
6.	M	310 CMR 22.04(2) and 22.26	Submit to MassDEP the Ground Water Rule Notice of Significant Deficiencies Response Form that was issued on 10/8/2010, and is also included with this report.	N	24-DEC-2010	
7.	M	310 CMR 22.04	The 2007 inspection report for the Fitchburg Street Storage Tank recommended recoating the exterior surfaces to avoid further corrosion. Please submit a plan and schedule to complete the recommended recoating.	N	24-JAN-2011	
8.	M	310 CMR 22.04	The Highland Street Storage Tank lacks security fencing. Please submit a plan and schedule to install security fencing or other protective measure, such as a security plan for the tank.	N	24-JAN-2011	
9.	T	Guidelines Chapter 6.3.4	There was no personal protective equipment at the Witches Brook Well #1 Pump Station (04G). At least one pair of gloves, a dust respirator for toxic dusts, an apron or other protective clothing, and splash goggles and face mask shall be provided for each operator as required by MSDS (material safety data sheets) and OSHA (Occupational Safety and Health Administration) 29CFR1910.	N	24-DEC-2010	
10.	M	310 CMR 22.04	Operators are not completing the pump station logs properly. TWD must maintain bound log books for all pump station activities. Please submit to MassDEP certification that pump station activities are being properly recorded.	N	24-DEC-2010	

11.	M	310 CMR 22.04(13)	There were no emergency phone numbers posted at the Harbor Trace WTP. Please post emergency phone numbers on-site and submit certification to MassDEP that it was completed.	N	24-DEC-2010	
12.	T	310 CMR 22.04 & Guidelines Chapter 5	The neutral pH buffer solution used for calibration of the pH analyzer at the Harbor Trace WTP was expired. Please obtain fresh buffer solution for this site and submit certification to MassDEP that it was completed.	N	24-DEC-2010	
13.	T	310 CMR 22.04 & Guidelines Chapter 12	The alarm system at the Harbor Trace WTP was not properly working due to problems calibrating the pH analyzer. Please submit documentation that the issue has been resolved.	N	24-DEC-2010	

**Table C - Recommendations**

MassDEP has made note of items with a recommended course of action, summarized in Table C. It is strongly encouraged to follow the recommended actions in order to improve ability to provide a safe supply of drinking water. Failure to do so could eventually lead to violations of the regulations.

TABLE C - RECOMMENDATIONS			
T/E/M	Citation		
1.	T	310 CMR 22.04(7) & Guidelines Chapter 9	The Department recommends that complete distribution system flushing be done twice per year.
2.	F	Guidelines Chapter 11	The Department recommends that a comprehensive rate study be conducted to fully assess the financial capacity of the TWD.

**\*Groundwater Rule Significant Deficiencies:** The EPA, as part of the Groundwater Rule, required states to identify specific Significant Deficiencies that are related to the potential for fecal contamination of the water system. Significant deficiencies, when identified at a PWS that is subject to the Groundwater Rule, are regulated under the treatment technique requirements of the GWR. A PWS has 120 days to correct any significant deficiencies after notification from the state of their existence. If the deficiencies cannot be corrected within 90 days, then the PWS must enter into a MassDEP-approved correction action plan, with intermediate timelines for compliance. Failure to have an approved corrective action plan in place within 120 days or to comply with the timelines contained within the corrective action plan, constitutes a treatment technique violation, as detailed in 310 CMR 22.26(4). If a system fails to correct any identified significant deficiencies, then the PWS will be required to provide an alternate source of water, eliminate the source of contamination, or provide treatment that reliably achieves at least 4-log inactivation of viruses.



**SANITARY SURVEY COMPLIANCE PLAN**  
**RESPONSE FORM for TABLE A & B**

**Within 45 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. 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, 627 Main Street, Worcester, MA 01608  
ATTENTION: KRISTIN DIVRIS



Massachusetts Department of Environmental Protection  
Bureau of Resource Protection – Drinking Water Program  
**Ground Water Rule (GWR) - Notice of Significant Deficiencies**  
M.G.L. c.111 §160 and 310 CMR 22.04(12) and 22.26

GWR-NSD

FILE COPY

**A General Information**

PWS Name: Townsend Water Department	City/Town: Townsend	PWS ID#: 2299000
PWS Address: Townsend Water Dept., PO Box 17, Townsend, MA 01469		COM <input checked="" type="checkbox"/> NTNC <input type="checkbox"/> TNC <input type="checkbox"/>
PWS Staff Interviewed: Paul Rafuse	PWS Phone #: 978-597-2212	PWS E-mail: paulr@townsendwater.com
MassDEP Inspector: Kristin Divris	GWR Inspection Date: 10/5/2010	GWR-NSD Date Issued: 10/8/2010

**B Description of Significant Deficiencies**

In accordance with 310 CMR 22.26 Ground Water Rule (GWR) provisions, the Department must notify your system of any GWR significant deficiency within 30 days of discovery. During the course of an inspection conducted at your system on the above date the Department identified significant deficiencies of the source, facilities, equipment, operation and/or maintenance of the PWS, identified below, which may jeopardize the delivery of safe water to all consumers.

**Source**

1. The wellhead is damaged in a manner that would make the source susceptible to contamination. Well(s) # \_\_\_\_\_ ☐
2. There are unprotected openings in the sanitary well casing or cap (e.g. vent for the well casing not screened and turned downward, unsealed conduit opening). Well(s) # \_\_\_\_\_ ☐
3. The wellhead, cap, and/or vent is subject to flooding (this includes a buried well casing). Well(s) # \_\_\_\_\_ ☐
4. There are unapproved groundwater sources being used by the PWS. *This is a violation of 310 CMR 22.21(1)(a).* ☐

Other/Comments:

**Treatment**

5. There are no raw water sample taps available for the collection of source samples for all wells. Well(s) # \_\_\_\_\_ ☐
6. All GW sources, or manifolds serving multiple GW sources, do not have emergency chemical injection ports available for disinfection of groundwater sources. (Only applies to COM & NTNC). Well(s) # \_\_\_\_\_ ☐
7. There are unprotected by-passes in the treatment process that could result in fecal contamination (i.e. filter backwash, membrane cleaning processes, etc.). ☐
8. The PWS is operating, maintaining, or monitoring its disinfection process in a manner that compromises the PWS's ability to ensure 4-log treatment is achieved. ☐
9. The PWS is operating, maintaining, or monitoring its membrane process in a manner that compromises the PWS's ability to ensure 4-log treatment is achieved. ☐

Other/Comments:

**Distribution and Transmission**

10. Under the cross connection control program all high hazard facilities have not been identified, surveyed, and properly protected. ☐
11. There are pressures below 20 psi under normal operating conditions in parts of the distribution system that could result in the entrance of fecal contaminants. ☐

Other/Comments:

**Finished Water Storage**

12. In-ground storage tanks, tank overflows, drains, or hatches are subject to flooding or run-off. ☐
13. There are holes or other failures of the tank roof or structure. ☐
14. The tank entry hatch or access ladder is not secured to prevent unauthorized access. ☐
15. The tank does not have proper screening or protection of overflow pipes, drains, and vents. ☒

Other/Comments: The Highland St. 1MG tank overflow pipe does not have a screen and is level with the ground (must terminate 12-24 inches above the ground surface and discharge over a drainage inlet structure or splash plate). A 24 mesh non-corrodible screen is required for both storage tank overflow pipes.

**Pumps, Pump Facilities, and Controls**

16. There is flooding or standing water in the pump house or pit that could result in the entrance of fecal ☐

contaminants.

17. The air/water relief valve discharge is hard piped to a floor drain without an air gap. ☐

Other/Comments:

**Monitoring, Reporting, and Data Verification**

18. The Total Coliform Rule (TCR) plan has not been updated to reflect current modifications of the distribution system. ☐

Other/Comments:

**System Management and Operation**

19. The PWS Emergency Response Plan is not readily available. ☒

20. All critical infrastructure is not locked (e.g., pump house, well vault, chemical treatment building). ☐

Other/Comments: The system provided a copy of the ERP Checklist; however, a hard copy of the ERP was not readily available as it is in digital form only and there were computer issues at the time of the inspection. At least one hard copy version must be accessible onsite.

**Operator Compliance with State Requirements**

21. The PWS does not have a certified operator. ☐

22. Certified operator grades are not appropriate for the system size and/or treatment type. ☐

Other/Comments:

**C Corrective Actions to Take and Deadline for Taking Such Actions in accordance with 310 CMR 22.26(4)**

You are required to take the following actions:

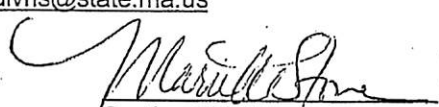
1. **Within 30 days** of receiving this notice you must **consult with your MassDEP regional office** (see contact info below) to determine the corrective actions that must be taken to address the deficiencies noted in Section B and submit a completed copy of the attached GWR Significant Deficiency Notice - Response Form to your MassDEP regional office.
2. **Within 120 days** of receiving this notice you must **complete all corrective actions** identified under Section C1 above or be in compliance with a MassDEP-approved corrective action plan and schedule.
3. **Within 30 days** of completing the required corrective action(s) you must notify MassDEP in writing.

Failure to take the corrective action(s) noted above will result in enforcement action.

**Important Information**

- ☒ This GWR inspection was completed during a sanitary survey. The deficiencies identified in Section B and all other findings discovered during the sanitary survey, will be listed under separate cover in the survey report and must be addressed in your Sanitary Survey Compliance Plan. However, you must take the actions in C as specified.
- ☐ For any significant deficiency identified above in Section B as a violation of 310 CMR 22.00 this GWR NSD is also a Notice of Noncompliance pursuant to M.G.L. c.21A sec. 16 and 310 CMR 5.00 and failure to take the actions specified above in Section C will result in enforcement action that may include penalties.

**Contact Information:** If you have any questions regarding this notice please contact:Kristin Divris, 627 Main St., Worcester, MA 01627, 508-849-4028, [Kristin.divris@state.ma.us](mailto:Kristin.divris@state.ma.us)

  
Section Chief  
Drinking Water Program  
Bureau of Resource Protection

Attachments:

- ☒ GWR SD Response Form  
☐ GWR Factsheet:

cc: Local BOH, MassDEP Regional GWR file "File Copy"

- ☐ Certified Operator \_\_\_\_\_  
☒ TA provider: Elizabeth Kotowski



Department of Environmental Protection  
Bureau of Resource Protection – Drinking Water Program

GWR-NSD- Response Form

**Ground Water Rule Notice of Significant Deficiencies (GWR-NSD) Response Form**  
M.G.L. c.111 §160 and 310 CMR 22.04(2) and 22.26

**General Information**

PWS Name: Townsend Water Department	City/Town: Townsend
PWS Address: PO Box 17, Townsend, MA 01469	PWS ID: 2299000
Contact Person: Paul Rafuse	COM <input checked="" type="checkbox"/> ; NTNC <input type="checkbox"/> ; or TNC <input type="checkbox"/>
Phone Number: 978-597-2212	Inspection Date: 10/05/2010
Email: paulr@townsendwater.com	GWR NSD Date Mailed: 10/8/2010

*During the course of an inspection on the date indicated above, MassDEP discovered significant deficiencies of the source, facilities, equipment, operation and/or maintenance of the PWS which will jeopardize the delivery of pure and safe water to all consumers.*

*In the GWR Notice of Significant Deficiency (GWR-NSD) mailed on the date noted above, MassDEP informed our system of the results of the inspection and required our system to take the following actions:*

- 1. Within 30 days of receiving the GWR-NSD, contact and coordinate with the specified staff person at the MassDEP Office regarding required corrective actions to address the deficiencies on the GWR-NSD; complete this form - GWR-NSD Response Form.*
- 2. Within 120 days after receiving this GWR-NSD complete the required corrective action or be in compliance with a state-approved corrective action plan and schedule; and,*
- 3. Within 30 days of completing the required corrective action(s) notify MassDEP in writing.*

**PWS Actions: Please check correct statements and attach a written explanation when requested.**

*Within 30 days of receiving the GWR-NSD my system is using this response form to inform the MassDEP of all actions taken:*

- ☐ My PWS contacted the Mass DEP region by telephone or email on \_\_\_/\_\_\_/\_\_\_ and coordinated with \_\_\_\_\_ **AND** my PWS corrected all significant deficiencies noted in 30 days. I have attached a summary of all activities.
- ☐ My PWS contacted the Mass DEP region by telephone or email on \_\_\_/\_\_\_/\_\_\_ and coordinated with \_\_\_\_\_ **BUT** my PWS was unable to correct all deficiencies in 30 days and will enter into an enforceable schedule to correct all significant deficiencies within 120 days of the GWR-NSD Notice.
- ☐ My PWS did not contact or coordinate with MassDEP specified staff as requested **BUT** my PWS corrected all significant deficiencies. I have attached a summary of my system's correctives actions. My PWS understands that MassDEP may take necessary enforcement action.
- ☐ My PWS did not contact or coordinate with the MassDEP specified staff as requested **AND** my PWS was unable to take the required action. My PWS understands that MassDEP will take necessary enforcement action to protect the consumers of my system.
- ☐ My PWS did not contact or coordinate with the MassDEP specified staff as requested **BUT** my PWS took the actions on the attached summary. My system understands that these actions may result in the MassDEP taking enforcement action to protect the consumers of my system.

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

I certify under penalties of law that I am the person authorized to fill out this form and that the information contained herein is true, accurate and complete to the best of my knowledge.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name: \_\_\_\_\_ Title: \_\_\_\_\_

Please complete this response form and return it with all required attachments to the Department of Environmental Protection at:

DEP-BRP Drinking Water Program, CERO  
Attn: Kristin Divris  
627 Main Street, Worcester, MA 01608

DWP USE: Date received: \_\_\_/\_\_\_/\_\_\_ Comments: \_\_\_\_\_





Massachusetts Department of Environmental Protection  
Bureau of Resource Protection – Drinking Water Program  
**Ground Water Rule (GWR) - Notice of Significant Deficiencies**  
M.G.L. c.111 §160 and 310 CMR 22.04(12) and 22.26

FILE COPY

GWR-NSD

**A General Information**

PWS Name: Townsend Water Department	City/Town: Townsend	PWS ID#: 2299000
PWS Address: Townsend Water Dept., PO Box 17, Townsend, MA 01469		COM <input checked="" type="checkbox"/> NTNC <input type="checkbox"/> TNC <input type="checkbox"/>
PWS Staff Interviewed: Paul Rafuse	PWS Phone #: 978-597-2212	PWS E-mail: paulr@townsendwater.com
MassDEP Inspector: Kristin Divris	GWR Inspection Date: 10/5/2010	GWR-NSD Date Issued: 10/8/2010

**B Description of Significant Deficiencies**

In accordance with 310 CMR 22.26 Ground Water Rule (GWR) provisions, the Department must notify your system of any GWR significant deficiency within 30 days of discovery. During the course of an inspection conducted at your system on the above date the Department identified significant deficiencies of the source, facilities, equipment, operation and/or maintenance of the PWS, identified below, which may jeopardize the delivery of safe water to all consumers.

**Source**

1. The wellhead is damaged in a manner that would make the source susceptible to contamination. Well(s) # \_\_\_\_\_ ☐
2. There are unprotected openings in the sanitary well casing or cap (e.g. vent for the well casing not screened and turned downward, unsealed conduit opening). Well(s) # \_\_\_\_\_ ☐
3. The wellhead, cap, and/or vent is subject to flooding (this includes a buried well casing). Well(s) # \_\_\_\_\_ ☐
4. There are unapproved groundwater sources being used by the PWS. *This is a violation of 310 CMR 22.21(1)(a),* ☐

Other/Comments:

**Treatment**

5. There are no raw water sample taps available for the collection of source samples for all wells. Well(s) # \_\_\_\_\_ ☐
6. All GW sources, or manifolds serving multiple GW sources, do not have emergency chemical injection ports available for disinfection of groundwater sources. (Only applies to COM & NTNC). Well(s) # \_\_\_\_\_ ☐
7. There are unprotected by-passes in the treatment process that could result in fecal contamination (i.e. filter backwash, membrane cleaning processes, etc.). ☐
8. The PWS is operating, maintaining, or monitoring its disinfection process in a manner that compromises the PWS's ability to ensure 4-log treatment is achieved. ☐
9. The PWS is operating, maintaining, or monitoring its membrane process in a manner that compromises the PWS's ability to ensure 4-log treatment is achieved. ☐

Other/Comments:

**Distribution and Transmission**

10. Under the cross connection control program all high hazard facilities have not been identified, surveyed, and properly protected. ☐
11. There are pressures below 20 psi under normal operating conditions in parts of the distribution system that could result in the entrance of fecal contaminants. ☐

Other/Comments:

**Finished Water Storage**

12. In-ground storage tanks, tank overflows, drains, or hatches are subject to flooding or run-off. ☐
13. There are holes or other failures of the tank roof or structure. ☐
14. The tank entry hatch or access ladder is not secured to prevent unauthorized access. ☐
15. The tank does not have proper screening or protection of overflow pipes, drains, and vents. ☒

Other/Comments: The Highland St. 1MG tank overflow pipe does not have a screen and is level with the ground (must terminate 12-24 inches above the ground surface and discharge over a drainage inlet structure or splash plate). A 24 mesh non-corrodible screen is required for both storage tank overflow pipes.

**Pumps, Pump Facilities, and Controls**

16. There is flooding or standing water in the pump house or pit that could result in the entrance of fecal ☐

contaminants.

17. The air/water relief valve discharge is hard piped to a floor drain without an air gap. ☐

Other/Comments:

**Monitoring, Reporting, and Data Verification**

18. The Total Coliform Rule (TCR) plan has not been updated to reflect current modifications of the distribution system. ☐

Other/Comments:

**System Management and Operation**

19. The PWS Emergency Response Plan is not readily available. ☒
20. All critical infrastructure is not locked (e.g., pump house, well vault, chemical treatment building). ☐

Other/Comments: The system provided a copy of the ERP Checklist; however, a hard copy of the ERP was not readily available as it is in digital form only and there were computer issues at the time of the inspection. At least one hard copy version must be accessible onsite.

**Operator Compliance with State Requirements**

21. The PWS does not have a certified operator. ☐
22. Certified operator grades are not appropriate for the system size and/or treatment type. ☐

Other/Comments:

**C Corrective Actions to Take and Deadline for Taking Such Actions in accordance with 310 CMR 22.26(4)**

You are required to take the following actions:

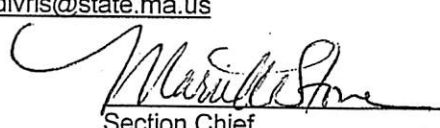
1. **Within 30 days** of receiving this notice you must **consult with your MassDEP regional office** (see contact info below) to determine the corrective actions that must be taken to address the deficiencies noted in Section B and submit a completed copy of the attached GWR Significant Deficiency Notice - Response Form to your MassDEP regional office.
2. **Within 120 days** of receiving this notice you must **complete all corrective actions** identified under Section C1 above or be in compliance with a MassDEP-approved corrective action plan and schedule.
3. **Within 30 days** of completing the required corrective action(s) you must notify MassDEP in writing.

Failure to take the corrective action(s) noted above will result in enforcement action.

**Important Information**

- ☒ This GWR inspection was completed during a sanitary survey. The deficiencies identified in Section B and all other findings discovered during the sanitary survey, will be listed under separate cover in the survey report and must be addressed in your Sanitary Survey Compliance Plan. However, you must take the actions in C as specified.
- ☐ For any significant deficiency identified above in Section B as a violation of 310 CMR 22.00 this GWR NSD is also a Notice of Noncompliance pursuant to M.G.L. c.21A sec. 16 and 310 CMR 5.00 and failure to take the actions specified above in Section C will result in enforcement action that may include penalties.

**Contact information:** If you have any questions regarding this notice please contact:Kristin Divris, 627 Main St., Worcester, MA 01627, 508-849-4028, [Kristin.divris@state.ma.us](mailto:Kristin.divris@state.ma.us)

  
Section Chief  
Drinking Water Program  
Bureau of Resource Protection

Attachments:

- ☒ GWR SD Response Form  
☐ GWR Factsheet:

cc: Local BOH, MassDEP Regional GWR file "File Copy"

- ☐ Certified Operator \_\_\_\_\_  
☒ TA provider: Elizabeth Kotowski



Department of Environmental Protection  
Bureau of Resource Protection – Drinking Water Program  
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Signature: \_\_\_\_\_ Date: \_\_\_\_\_

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**Attn: Kristin Divris**  
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DWP USE: Date received: \_\_\_/\_\_\_/\_\_\_ Comments: \_\_\_\_\_