

Enforcement Case Studies with EPA/POTW Involvement

Maynard, MA

- First occurrence:

Strange black influent coming in at random times mostly in the middle of the night

Slug Load – resulting in failed Whole Effluent Toxicity test

Visible at headworks but not in pump stations

Performed extensive industrial user review with no source of discharge

- Second occurrence:

White slug to the headworks.

Usually this lasts 2 to 3 days off and on but plant will meet NPDES permit limits IF go heavy on Polyaluminum Chloride.



Montague, MA Incident

- POTW was notified by DPW that while they were out cleaning lines, they came across paint residue and what appeared to look and smell like paint thinner in the manhole directly servicing a commercial painter building. In fact, the jet rodding hose was covered in grey paint when it was pulled out of the line.



Town of Montague

Clean Water Facility
34 Greenfield Road

Montague MA 01351-9522

CWF.SUPT@MONTAGUE-ma.gov

(413) 773-8865

FAX: (413) 774-6231

March 26, 2025

BY IN-HAND

BY CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Attn: Christopher Couture
PO Box 270
400 Avenue A
Turners Falls, MA 01376

NOTICE OF VIOLATION AND CEASE AND DESIST ORDER

Christopher Couture,

In accordance with the Town of Montague Sewer Use Regulation, this correspondence shall serve as formal Notice of Violation and Cease and Desist concerning the discharge from the property located at 400 Avenue A, Turners Falls, MA (the "property") to the Town of Montague sewer system and publicly owned treatment works (POTW.) This Notice and Order is based on the following facts:

On March 13th, 2025, at approximately 11:30 am, during routine sewer line cleaning, it was discovered that wastewater discharged from the property contained a thick, grey, paint-like substance and emitted a strong odor of paint thinner. This is in violation of the Sewer Use Ordinance Article IV, Section 4, and potentially a serious public worker health and safety hazard with pollutants that *result in the presence of toxic, noxious or malodorous gases, vapors, liquids or fumes within the sewers or POTW in a quantity that may cause acute worker health and safety problems.*

As a result of this Notice of Non-Compliance, you are **hereby ordered to immediately cease all discharges other than normal household wastewater, and within five (5) days** of the receipt of this Notice, provide the Superintendent with a written explanation of the violation and a plan for the satisfactory correction and prevention thereof.

Please be advised that any future violations may result in the assessment of fines and other financial penalties, criminal prosecution and/or termination or suspension of sewer service. Please be further advised that the Massachusetts Department of Environmental Protection and the United States Environmental Protection Agency have been informed of the violations cited herein, and each such agency may take whatever action it deems necessary to enforce the laws within its jurisdiction. Nothing herein should be deemed to waive your obligation to comply with the laws and orders of those agencies, and to the extent that anything in this order conflicts with the orders of those agencies, the more stringent requirements will control.

Chelsey Little, BSBS MPH
Superintendent

cc: Montague Board of Health, United States EPA, Massachusetts DEP

Tip/Complaint

“In 2010 Facility was upgraded. The new b and c sections got rid of the air sparging system they used to get rid of the chloroform. They now use very ineffective agitators to get rid of the chloroform. In 2023 production upgrades got production of xxxxxx increased by 100% . When they run fast the chloroform in wastewater increases. They run fast every day except Thursday. Thursday the city comes in for a bod sample. Incase the city also asks for a chloroform sample they don't run fast. In 2010 they also got rid of the wastewater presses. They have no effective way to remove solids from the wastewater. In the past they have told the city the two presses they have are for wastewater. They are not. They are for shellac production. The old pilot plant is where very nasty water is stored. They only send this water to city when they are 90 percent sure the city isn't testing them. The wastewater system has been stripped to bare bones. 75% of the buttons on the wastewater system do not work. The water that Facility A is sending to POTW A is high in chloroform every day except Thursday. I have worked at Company A for 30 years. Just recently found out there water eventually ends up in the ABC River. This is why I'm sending this.”

Complaint

- This company does XXXXXXXXX, and it smells for miles around. The nearby river smells very strongly of chemicals and the air smells like burnt plastic on a weekly basis.

Tip/Complaint

- Arsenic exposure to employees including a pregnant employee. Improper PPE provided to employees. Aerosolized arsenic. Dumping of arsenic down drains with wastewater without proper wastewater permits. Several other heavy metals being dumped down drains. Improper training given to employees.

Dairy (Springfield, MA)

- POTW received notice of a discharge of 600 gallons of liquid cream directly into the previously determined insufficient pretreatment system. SIU staff were told by management to forego a cleaning procedure prior to turning on an additional process in order to meet a production quota.



POTW Actions (Among many other things..)

- Published in the newspaper for Significant Non Compliance
- SIU Permit modified to include more frequent (3/week) sampling for BOD, TSS and FOG
- Future surcharges for FOG
- Fined for \$7,900

POTW Administrative Order on Consent (AOC) Northbridge, MA

- The Town's failure to comply with the NPDES permit that required the Town to develop and submit an Industrial Pretreatment Program to EPA.
- The AOC ordered the Town to develop certain elements of the IPP under by scheduled dates

Criminal
Investigations
Ongoing