



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

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Kimberley Driscoll
Lieutenant Governor

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Commissioner

April 22, 2024

Issued Electronically

james.laurila@waterandsewer.org

Springfield Water and Sewer Commission
Mr. James Laurila, Director of Water Operations
PO Box 995
Springfield, MA 01101-0995

Re: Springfield-DWP
Springfield Water and Sewer Commission
PWS ID# 1281000
ENF 00004088
Enforcement

NOTICE OF ENFORCEMENT ACTION

Enclosed is your copy of the fully executed Administrative Consent Order (ACO) addressing exceedances of allowed limits associated with disinfection byproducts.

If you have any questions about this matter, or wish to request a meeting, please contact Douglas Paine at douglas.paine@mass.gov.

Respectfully,

Andrew Kelly
Drinking Water Section Chief
Western Regional Office

Cc: Boston-DWP
MassDEP-WERO:J. Gibbs; Heather Parent
Springfield BOH

SP:\BWR\WS\Enforcement\ACO\Springfield\1281000 2024-04-22 ACO DBPR Cover Signed
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This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.

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**COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION**

In the matter of:

Springfield Water and Sewer Commission

Enforcement Document Number:

00004088

Issuing Bureau: BWR

Issuing Region/Office: WERO

Issuing Program: DWP

Primary Program Cited: DWP

PWS ID # 1281000

**ADMINISTRATIVE CONSENT ORDER
AND
NOTICE OF NONCOMPLIANCE**

I. THE PARTIES

1. The Department of Environmental Protection (“Department” or “MassDEP”) is a duly constituted agency of the Commonwealth of Massachusetts established pursuant to M.G.L. c. 21A, § 7. MassDEP maintains its principal office at 100 Cambridge Street, Boston, Massachusetts 02114, and its Western Regional Office at 436 Dwight Street, Springfield, Massachusetts 01103.

2. Springfield Water and Sewer Commission (“Respondent” or “SWSC”) is an independent public instrumentality of the Commonwealth of Massachusetts with a place of business at 250 M Street Extension, Agawam, Massachusetts 01001. Respondent’s mailing address for purposes of this Consent Order is PO Box 995, Springfield, Massachusetts 01001-0995.

II. STATEMENT OF FACTS AND LAW

3. MassDEP has primary enforcement responsibility for the requirements of the Federal Safe Drinking Water Act, 42 U.S.C. §300f et seq. and the regulations promulgated there under. MassDEP implements and enforces statutes and regulations of the Commonwealth of Massachusetts for the protection of the public drinking water supply, including, without limitation, M.G.L. c. 111, §5G and §160 and the Drinking Water Regulations at 310 CMR 22.00; the Cross Connections, Distribution System Protection Regulations at 310 CMR 22.22; and the Underground Injection Control Regulations at 310 CMR 27.00. MassDEP, pursuant to M.G.L. c. 111, §160, may issue such orders as it deems necessary to ensure the delivery of fit and pure drinking water by public water systems to all consumers. MassDEP, pursuant to M.G.L. c. 111, §5G, may require by order the provision and operation of such drinking water treatment facilities as it deems necessary to ensure the delivery of a safe water supply to all consumers.

MassDEP’s Drinking Water Regulations at 310 CMR 22.02 define a public water system as a system for the provision to the public of water for human consumption, through pipes or other constructed

conveyances, if such system has at least 15 service connections or regularly serves an average of at least 25 individuals daily at least 60 days of the year. 310 CMR 22.02 also defines a supplier of water as “any person who owns or operates a public water system.”

MassDEP has authority under M.G.L. c. 21A, § 16 and the Administrative Penalty Regulations at 310 CMR 5.00 to assess civil administrative penalties to persons in noncompliance with the laws and regulations set forth above.

4. Respondent is a Supplier of Water as defined in 310 CMR 22.02. Respondent owns and operates a Community Public Water System located in Springfield and Ludlow, Massachusetts. Respondent’s Community Public Water System includes the West Parish Filtration Plant.

5. Wholesale Public Water System means a public water system (PWS) that treats source water as necessary to produce finished water and then delivers some or all of that finished water to another Public Water System.

6. The following facts and allegations have led MassDEP to issue this Consent Order:

- A. In addition to serving its own Public Water System, Respondent is a Wholesale Public Water System, providing treated water to other Public Water Systems including those that serve the Towns of Agawam (PWSID# 1005000), Longmeadow (PWSID# 1159000) and East Longmeadow (PWSID# 1085000). As a PWS which uses a surface water source, and provides chlorine-based disinfection, Respondent is subject to the requirements of the Disinfection Byproducts Rule (DBPR). Under the DBPR, Respondent must maintain a Total Trihalomethane (TTHM) running annual average at each of its eight testing locations of less than 80 ug/l, and a Haloacetic Acid 5 (HAA5) running annual average at each of its eight testing locations of less than 60 ug/l.
- B. A Public Water System, such as Respondent, that is subject to the requirements of the Disinfection Byproducts Rule (DBPR), has exceeded the operational evaluation level (OEL) at any monitoring location when the sum of the two previous quarters of TTHM or HAA5 results, plus twice the current quarter’s result, divided by four (to determine an average), exceeds 80 ug/l for TTHM or 60 ug/l for HAA5. Systems that exceed the OEL must submit an Operational Evaluation Reporting Form, detailing the reasons for the exceedance and the actions to be taken to reduce future Disinfection Byproducts (DBP) levels.
- C. Pursuant to 310 CMR 22.07F(7)(d)1., under the Stage 2 DBPR, a Public Water System such as Respondent must maintain compliance with the Maximum Contaminant Levels (MCLs) for Total Trihalomethane (TTHM) and Haloacetic Acid 5 (HAA5). The MCL for TTHM is 80 ug/l and the MCL for HAA5 is 60 ug/l. The MCLs are determined by calculating the running annual average at each of its eight testing locations (the “Locational Running Annual Average” or “LRAA” as defined in 310 CMR 22.02).

- D. Massachusetts Drinking Water Regulation 310 CMR 22.03(14) requires that, if a regulated contaminant limit is violated, a Supplier of Water take appropriate actions to reduce the level of contaminant concentrations to safe levels. Massachusetts Drinking Water Regulation 310 CMR 22.07E(4)(b), identifies the best technology, Treatment Techniques, or other means available for achieving compliance with the Maximum Contaminant Levels for TTHM and HAA5 identified in 310 CMR 22.07E(1), and the Disinfection Byproduct Best Available Technology is identified as Enhanced Coagulation or Enhanced Softening, plus GAC10 (granular activated carbon filter beds as defined in 310 CMR 22.02); or nanofiltration with a molecular weight cutoff less than or equal to 1000 Daltons; or granular activated carbon filter beds GAC20 (granular activated carbon filter beds as defined in 310 CMR 22.02).
- E. Respondent had HAA5 OEL exceedances during ten of the sixteen monitoring quarters between the January 1, 2018 and December 31, 2021. Respondent also had a TTHM OEL exceedance during each monitoring quarter from November 1, 2021 through December 31, 2022.
- F. Respondent exceeded the HAA5 maximum contaminant level (MCL) during nineteen of the twenty-four quarters between the January 1, 2018 and December 31, 2023, in violation of 310 CMR 22.07F(7)(d)1. Respondent also exceeded the TTHM maximum contaminant level during each monitoring quarter from January 1, 2022 to December 31, 2022.
- G. In response to each quarterly OEL exceedance(s), MassDEP issued individual letters requiring that Respondent complete and submit an *Operational Evaluation Reporting Form (OEL Form)*. The purpose of the form is to provide a self-evaluation of the potential causes for the OEL exceedances and to put into place remedies that would prevent further OEL exceedances and MCL violations. OEL Forms are required to be submitted no later than 90 days after being notified of the analytical result that causes the PWS to exceed the operational evaluation level.
- H. Respondent submitted *OEL Forms* within the required time periods, in response to each HAA5 and TTHM OEL exceedance that occurred between January 1, 2018 and December 31, 2022. Within its submitted *OEL Forms* Respondent states that it has implemented the following steps:
- a. Minimization of the use of its slow sand filters when demand and capacity allow.
 - b. Continuation of monitoring and control of its coagulation process to achieve optimized performance of the rapid sand filters.
 - c. Continuation of improved monitoring protocols and chlorine dosing adjustments using daily data analysis in order to maintain the optimal chlorine residual.

- d. Reduction of finished water age by adding devices to its Provin Mountain finished water storage reservoirs, and by continuing to remove one of its four finished water reservoirs from service as a step towards reducing water age.
 - e. Use seasonal distribution flushing to reduce water age as well as improve chlorine residual in areas where the residual is low.
 - f. Completion of a year-long treatment process pilot study.
- I. MassDEP has responded to the HAA5 and TTHM MCL violations as follows:
- 1) In response to the MCL violations which occurred through December 31, 2022, MassDEP issued Notices of Noncompliance (NON): on January 14, 2019 addressing the fourth quarter 2018 HAA5 MCL violation; on April 29, 2019 addressing the first quarter 2019 HAA5 MCL violation; on August 5, 2019 addressing the second quarter 2019 HAA5 MCL violation; on June 26, 2020 addressing the third quarter 2019, the fourth quarter 2019, the first quarter 2020, and the second quarter 2020 HAA5 MCL violations; on March 11, 2021 addressing the third quarter 2020 HAA5 MCL violation; on May 4, 2022 addressing the first, third and fourth quarter 2021 HAA5 MCL violations; and on April 12, 2023 addressing the first, second, third and fourth quarter 2022 HAA5 and TTHM MCL violations. Within each NON, Respondent was required to submit an Engineering Report, completed by an independent consultant. The purpose of the Engineering Report is to look at all aspects of Respondent's operation and make recommendations for preventing or mitigating future exceedances. These reports were completed and submitted by the Commission in a timely manner and were accepted by MassDEP.
 - 2) With respect to the violations which occurred from January 1, 2023-December 31, 2023, MassDEP verbally notified SWSC that this Order would be forthcoming to address those violations. As of the date of this Order Respondent addressed the violations consistent with the terms described in Paragraph 9.C of this Order.
- J. Within a May 24, 2019 letter, MassDEP conditionally approved Respondent's April 11, 2019 permit proposal to conduct pilot testing. The objectives of the pilot study were to determine the most effective means of treatment and to provide design criteria for subsequent water treatment facility modifications to meet all existing and anticipated drinking water regulations, including those related to DBPR compliance.
- K. On July 1, 2019, Respondent submitted an Engineering Report prepared by its engineering consultant as required within MassDEP's January 14, 2019 NON and April 29, 2019 NON. The engineering report contained short-term and long-term compliance strategies including:

- a. Source water management
 - i. Identifying sources of Total Organic Carbon/Dissolved Organic Carbon (TOC/DOC) and impact on DBP formation.
 - b. Operational changes to the existing treatment process:
 - i. Favoring rapid rate filtration over slow sand filtration
 - c. Changes to the treatment process's coagulation component:
 - i. Identifying optimal coagulants
 - ii. Establish practices to ensure coagulation control
 - iii. Modify coagulation pH and consider higher coagulant doses
 - d. Existing process improvements:
 - i. Pre-oxidation (included within pilot testing)
 - ii. Adding clarification ahead of existing filters (included within pilot testing)
 - e. Addressing water age:
 - i. Flushing programs and storage tank optimization
 - ii. Tank mixing
- L. Within an April 14, 2020 letter, MassDEP conditionally approved Respondent's March 27, 2020 permit proposal for the addition of mixers at the Provin Mountain Reservoirs. The tank mixers have been installed and are in operation.
- M. Within a May 6, 2020 letter, MassDEP conditionally approved Respondent's March 27, 2020 permit proposal for the decommissioning of Reservoir No.1 and Seasonal Operation of Reservoir No. 2, No. 3 and No. 4 with the intent of tank optimization to reduce water age.
- N. On September 29, 2020 Respondent electronically submitted two permit proposals (WS22D and WS25) to temporarily modify its treatment plant to conduct a half-plant pilot to evaluate a promising treatment process change. This permit application was approved by MassDEP on November 19, 2020, with additional approval conditions added within a December 15, 2020 letter.
- O. On March 31, 2021, Respondent submitted a Pilot Study Report (BRP WS 22D permit application). The report included recommended actions and a proposed schedule of actions.
- P. Within a May 21, 2021 correspondence, MassDEP provided notice that its review of Respondent's Pilot Study Report permit application was underway and required that:
- “Within 120 days of receipt of MassDEP's review of the Pilot Study Report, SWSC shall provide recommended actions and a proposed compliance schedule for completion of those actions. The report, currently under review by MassDEP, may include such recommended actions and a schedule. SWSC shall implement MassDEP reviewed and approved actions and an approved schedule for those actions to improve water quality delivered by SWSC's public water system, such

actions to be based upon the results of the pilot test study and available information.”

- R. On August 10, 2021, MassDEP conditionally approved Respondent’s Pilot Study Report permit application which included the following conditions:
- a. “MassDEP requires SWSC to provide the most up to date proposed Implementation Schedule of West Parish Filters Capital Improvements within 90 days of this approval letter.”
 - b. “Within 120 days of receipt of MassDEP’s review of the Pilot Study Report, SWSC shall provide recommended actions and a proposed compliance schedule for completion of those actions. The report currently under review may include such recommended actions and a schedule. SWSC shall implement MassDEP reviewed and approved actions and an approved schedule for those actions to improve water quality delivered by SWSC’s public water system, such actions to be based upon the results of the pilot test study and available information.”
- S. On November 4, 2021, Respondent submitted, through its consulting engineer, correspondence which addressed the requirements included within MassDEP’s May 21, 2021 correspondence and the conditions included within MassDEP’s August 10, 2021 Pilot Study Report permit approval. Through that correspondence, Respondent provided notice that it intended to construct a new water treatment plant to replace its current West Parish Filtration Plant, with design, permit approval, and construction to be completed by December 2027. After considering the available treatment techniques, including those identified in 310 CMR 22.07E(4)(b), conventional treatment with Dissolved Air Flotation (DAF) was determined to be the most effective treatment technique available for achieving compliance with the Maximum Contaminant Levels for TTHM and HAA5 and was selected for the new water treatment plant design. Respondent also provided notice that it intended to continue to implement short-term measures in an effort to mitigate disinfection byproduct levels including: a) source water organics monitoring program for optimizing coagulation and disinfection; b) minimization of slow sand filter use; c) control of chlorination with the goal of minimizing DBP formation while also providing primary and secondary disinfection; d) water age reduction; and e) distribution system flushing.
- T. Within a February 28, 2022 correspondence, MassDEP conditionally approved Respondent’s short-term and long-term recommended actions and implementation schedule as presented within its November 4, 2021 correspondence, including Respondent’s proposed schedule to complete construction of its new treatment plant by December 31, 2027.
- U. Within a March 18, 2022 correspondence, MassDEP conditionally approved Respondent’s permit application proposing the construction of two replacement clearwells and a backwash pumping station at its West Parish Filtration Plant. The new

facilities will be incorporated into Respondent's new treatment plant design and function, and as of November 2023 are currently being utilized in the existing facilities to provide reliability and redundancy for original plant equipment that was beyond its useful life.

- V. Within a February 17, 2023 correspondence, Respondent provided an update to its projected schedule for construction of its new water treatment plant, with the new projected completion date moved from December 31, 2027 to mid-year 2028. Respondent's updated schedule was prepared by its consulting engineer based on a value engineering and constructability review of the project conducted at the 30% design phase.
- W. On October 26, 2023, Respondent submitted a substantially complete WS24 permit application proposing to construct a new water treatment plant as a long term control of disinfection byproducts levels. The new plant is also designed to address current and future documented needs related to capacity, redundancy, reliability, resiliency, and evolving regulatory requirements. Subsequently on January 8, 2024 the permit was approved by MassDEP.

III. DISPOSITION AND ORDER

For the reasons set forth above, MassDEP hereby issues, and Respondent hereby consents to, this Order:

- 7. The parties have agreed to enter into this Consent Order because they agree that it is in their own interests, and in the public interest, to proceed promptly with the actions called for herein rather than to expend additional time and resources litigating the matters set forth above. Respondent enters into this Consent Order without admitting or denying the facts or allegations set forth herein. However, Respondent agrees not to contest such facts and allegations for purposes of the issuance or enforcement of this Consent Order.
- 8. MassDEP's authority to issue this Consent Order is conferred by the Statutes and Regulations cited in Part II of this Consent Order.
- 9. Respondent shall perform the following actions:
 - A. By September 30, 2028, Respondent shall have retained all federal, state and local permit approvals, shall complete construction in accordance with MassDEP's permit approval, and shall have placed its new West Parish water filtration plant into service.
 - B. Respondent shall continue to implement its short-term disinfection byproduct control measures, as identified within its November 21, 2021 correspondence.
 - C. In response to the MCL violations which occurred after January 1, 2023 and through the effective date of this Consent Order, Respondent shall issue Public Notifications in accordance with 310 CMR 22.16(3) and submit to the local Board of Health and

MassDEP a certification that it has fully complied with the public notice regulations in accordance with 310 CMR 22.15(3)(b).

D. Until MassDEP has issued Respondent a return to compliance letter pursuant to Paragraph 24 of this Order, Respondent shall continue to sample for disinfection byproducts in accordance with MassDEP's issued Sampling Schedule; for each maximum contaminant level violation, and/or exceedance of the Operational Evaluation Level (OEL), Respondent shall submit *Operational Evaluation Reporting Form(s)*, issue public notification, and submit public notification certification form(s), as required by 310 CMR 22.16(3) and 310 CMR 22.15(3)(b).

10. Unless submitted via eDEP or except as otherwise provided, all notices, submittals and other communications required by this Consent Order shall be directed to:

Douglas Paine, Drinking Water Program
Massachusetts Department of Environmental Protection
436 Dwight Street
Springfield, MA 01103

Such notices, submittals and other communications shall be considered delivered by Respondent upon receipt by MassDEP.

11. Actions required by this Consent Order shall be taken in accordance with all applicable federal, state, and local laws, regulations and approvals. This Consent Order shall not be construed as, nor operate as, relieving Respondent or any other person of the necessity of complying with all applicable federal, state, and local laws, regulations and approvals.

12. For purposes of M.G.L. c. 21A, § 16 and 310 CMR 5.00, this Consent Order shall also serve as a Notice of Noncompliance for Respondent's noncompliance with the requirements cited in Part II 612 above. MassDEP hereby determines, and Respondent hereby agrees, that any deadlines set forth in this Consent Order constitute reasonable periods of time for Respondent to take the actions described.

mg
13.
123.
DR

13. Respondent is a Permittee, as that term is defined in 310 CMR 4.02, for the purpose of assessing and collecting annual compliance assurance fees pursuant to M.G.L. c. 21A, §18 and M.G.L. c. 21E, §3B.

14. Respondent understands, and hereby waives, its right to an adjudicatory hearing before MassDEP on, and judicial review of, the issuance and terms of this Consent Order and to notice of any such rights of review. This waiver does not extend to any other order issued by the MassDEP.

15. This Consent Order may be modified only by written agreement of the parties hereto.

16. The provisions of this Consent Order are severable, and if any provision of this Consent Order or the application thereof is held invalid, such invalidity shall not affect the validity of other provisions of this Consent Order, or the application of such other provisions, which can be given

effect without the invalid provision or application, provided however, that MassDEP shall have the discretion to void this Consent Order in the event of any such invalidity.

17. Nothing in this Consent Order shall be construed or operate as barring, diminishing, adjudicating or in any way affecting (i) any legal or equitable right of MassDEP to issue any additional order or to seek any other relief with respect to the subject matter covered by this Consent Order, or (ii) any legal or equitable right of MassDEP to pursue any other claim, action, suit, cause of action, or demand which MassDEP may have with respect to the subject matter covered by this Consent Order, including, without limitation, any action to enforce this Consent Order in an administrative or judicial proceeding.

18. This Consent Order shall not be construed or operate as barring, diminishing, adjudicating, or in any way affecting, any legal or equitable right of MassDEP or Respondent with respect to any subject matter not covered by this Consent Order.

19. This Consent Order shall be binding upon Respondent and upon Respondent's successors and assigns. Respondent shall not violate this Consent Order and shall not allow or suffer Respondent's employees, agents, contractors or consultants to violate this Consent Order. Until Respondent has fully complied with this Consent Order, Respondent shall provide a copy of this Consent Order to each successor or assignee at such time that any succession or assignment occurs.

20. In addition to the penalty set forth in this Consent Order, if any (including any suspended penalty), if Respondent violates any provision of the Consent Order, Respondent shall pay stipulated civil administrative penalties to the Commonwealth in the amount of one hundred dollars (\$100.00) per day for each day, or portion thereof, each such violation continues.

Stipulated civil administrative penalties shall begin to accrue on the day a violation occurs and shall continue to accrue until the day Respondent corrects the violation or completes performance, whichever is applicable. Stipulated civil administrative penalties shall accrue regardless of whether MassDEP has notified Respondent of a violation or act of noncompliance. All stipulated civil administrative penalties accruing under this Consent Order shall be paid within thirty (30) days of the date MassDEP issues Respondent a written demand for payment. If simultaneous violations occur, separate penalties shall accrue for separate violations of this Consent Order. The payment of stipulated civil administrative penalties shall not alter in any way Respondent's obligation to complete performance as required by this Consent Order. MassDEP reserves its right to elect to pursue alternative remedies and alternative civil and criminal penalties which may be available by reason of Respondent's failure to comply with the requirements of this Consent Order. In the event MassDEP collects alternative civil administrative penalties, Respondent shall not be required to pay stipulated civil administrative penalties pursuant to this Consent Order for the same violations.

Respondent reserves whatever rights it may have to contest MassDEP's determination that Respondent failed to comply with the Consent Order and/or to contest the accuracy of MassDEP's calculation of the amount of the stipulated civil administrative penalty. Upon exhaustion of such rights, if any, Respondent agrees to assent to the entry of a court judgment if such court judgment is necessary to execute a claim for stipulated penalties under this Consent Order.

21. Failure on the part of MassDEP to complain of any action or inaction on the part of Respondent shall not constitute a waiver by MassDEP of any of its rights under this Consent Order. Further, no waiver by MassDEP of any provision of this Consent Order shall be construed as a waiver of any other provision of this Consent Order.

22. To the extent authorized by the current owner, Respondent agrees to provide MassDEP, and MassDEP's employees, representatives and contractors, access at all reasonable times to the Springfield Water and Sewer Commission's facilities for purposes of conducting any activity related to its oversight of this Consent Order. Notwithstanding any provision of this Consent Order, MassDEP retains all of its access authorities and rights under applicable state and federal law.

23. Force Majeure

A. MassDEP agrees to extend the time for performance of any requirement of this Consent Order if MassDEP determines that such failure to perform is caused by a Force Majeure event. The failure to perform a requirement of this Consent Order shall be considered to have been caused by a Force Majeure event if the following criteria are met: (1) an event delays performance of a requirement of this Consent Order beyond the deadline established herein; (2) such event is beyond the control and without the fault of Respondent and Respondent's employees, agents, consultants, and contractors; and (3) such delay could not have been prevented, avoided or minimized by the exercise of due care by Respondent or Respondent's employees, agents, consultants, and contractors.

B. Financial inability and unanticipated or increased costs and expenses associated with the performance of any requirement of this Consent Order shall not be considered a Force Majeure Event.

C. If any event occurs that delays or may delay the performance of any requirement of this Consent Order, Respondent shall immediately, but in no event later than 5 days after obtaining knowledge of such event, notify MassDEP in writing of such event. The notice shall describe in detail: (i) the reason for and the anticipated length of the delay or potential delay; (ii) the measures taken and to be taken to prevent, avoid, or minimize the delay or potential delay; and (iii) the timetable for taking such measures. If Respondent intends to attribute such delay or potential delay to a Force Majeure event, such notice shall also include the rationale for attributing such delay or potential delay to a Force Majeure event and shall include all available documentation supporting a claim of Force Majeure for the event. Failure to comply with the notice requirements set forth herein shall constitute a waiver of Respondent's right to request an extension based on the event.

D. If MassDEP determines that Respondent's failure to perform a requirement of this Consent Order is caused by a Force Majeure event, and Respondent otherwise complies with the notice provisions set forth in paragraph C above, MassDEP agrees to extend in writing the time for performance of such requirement. The duration of this extension shall be equal to the period of time the failure to perform is caused by the Force Majeure event. No extension shall be provided for any period of time that Respondent's failure to perform could have been prevented, avoided or minimized by the exercise of due care. No penalties shall become due for Respondent's failure to perform a requirement of this Consent Order during the extension of the time for performance resulting from a Force Majeure event.

E. A delay in the performance of a requirement of this Consent Order caused by a Force Majeure event shall not, of itself, extend the time for performance of any other requirement of this Consent Order.

24. This Consent Order may be executed in one or more counterpart originals, all of which when executed shall constitute a single Consent Order.

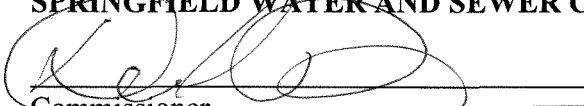
25. All applicable transmittal fees shall accompany any submissions(s) required by this Consent Order.

26. Respondent's obligations under this Consent Order shall cease upon Respondent's completion of all actions and payments required pursuant to Paragraphs 9.A through 9.D of this Consent Order and MassDEP's issuance of a return to compliance letter stating that Respondent has completed the requirements of said Paragraphs.

27. The undersigned certify that they are fully authorized to enter into the terms and conditions of this Consent Order and to legally bind the party on whose behalf they are signing this Consent Order.

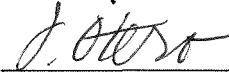
26. This Consent Order shall become effective on the date that it is executed by MassDEP.

Consented To:
SPRINGFIELD WATER AND SEWER COMMISSION




Commissioner

Date: April 18, 2024



Commissioner


Date: April 18, 2024



Commissioner

Date: April 18, 2024

Issued By:
DEPARTMENT OF ENVIRONMENTAL PROTECTION

By: 

Michael Gorski
Regional Director
MassDEP

Date: April 22, 2024

In the Matter of: Springfield Water and Sewer Commission
Enforcement Document Number: 00004088
Page 12 of 12

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重要 महत्वपूर्ण σημαντικός
Important
կարևոր quan trọng مهم



Communication for Non-English-Speaking Parties

This document is important and should be translated immediately.

If you need this document translated, please contact MassDEP's Diversity Director at the telephone number listed below.

Español Spanish

Este documento es importante y debe ser traducido de inmediato. Si necesita este documento traducido, comuníquese con la Directora de Diversidad de MassDEP al número de teléfono que aparece más abajo.

Português Portuguese

Este é um documento importante e deve ser traduzido imediatamente. Se precisar de uma tradução deste documento, entre em contato com o Diretor de Diversidade da MassDEP nos números de telefone listados abaixo.

繁體中文 Chinese Traditional

本文件非常重要，應立即翻譯。如果您需要翻譯這份文件，請用下面列出的電話號碼聯絡 MassDEP 多元化負責人。

简体中文 Chinese Simplified

本文件非常重要，应立即翻译。如果您需要翻译这份文件，请用下面列出的电话号码与 MassDEP 的多元化主任联系。

Ayisyen Kreyòl Haitian Creole

Dokiman sa-a se yon bagay enpòtan epi yo ta dwe tradwi l imedyatman. Si ou bezwen dokimar sa a tradwi, tanpri kontakte Direktè Divèsite MassDEP la nan nimewo telefòn endike anba.

Việt Vietnamese

Tài liệu này rất quan trọng và cần được dịch ngay lập tức. Nếu quý vị cần dịch tài liệu này, xin liên lạc với Giám đốc Đa dạng của MassDEP theo các số điện thoại ghi dưới đây.

ប្រទេសកម្ពុជា Khmer/Cambodian

ឯកសារនេះគឺសំខាន់ហើយគួរត្រូវបានបកប្រែភ្លាមៗ។ ប្រសិនបើអ្នកត្រូវការឱ្យគេបកប្រែឯកសារនេះ:

សូមទាក់ទងមកនាយកដ្ឋានពិពិធកម្មរបស់ MassDEP តាមលេខទូរស័ព្ទខាងក្រោម។

Kriolu Kabuverdianu Cape Verdean

Kel dokumentu li é inportáti y debe ser traduzidu imediatamenti. Se bu meste di kel dokumentu traduzidu, pur favor kontakta Diretor di Diversidádi di MassDEP na numeru abaxu indikadu.



Contact Glynis L. Bugg, Acting Diversity Director/Civil Rights 857-262-0606

**Massachusetts Department of Environmental Protection
100 Cambridge Street 9th Floor Boston, MA 02114**

TTY# MassRelay Service 1-800-439-2370 • <https://www.mass.gov/environmental-justice>

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Русский Russian

Это важный документ, и он должен быть безотлагательно переведен. Если вам нужен перевод данного документа, пожалуйста, свяжитесь с директором по вопросам многообразия (Diversity Director) компании MassDEP по указанному ниже телефону.

العربية Arabic

هذه الوثيقة مهمة ويجب ترجمتها على الفور. إذا كنت بحاجة إلى هذه الوثيقة مترجمة، يرجى الاتصال بمدير التنوع (MassDEP ٨٥٧٢٦٢٠٦٠٦) على أرقام الهواتف المدرجة أدناه.

한국어 Korean

이 문서는 중요하고 즉시 번역해야 합니다. 이 문서의 번역이 필요하시다면, 아래의 전화 번호로 MassDEP의 다양성 담당 이사에 문의하시기 바랍니다.

հայերեն Armenian

Այս փաստաթուղթը կարևոր է և պետք է անմիջապես թարգմանվի: Եթե Ձեզ անհրաժեշտ է այս փաստաթուղթը թարգմանել, դիմեք MassDEP-ի բազմազանության տնօրենին ստորև նշված հեռախոսահամարով:

فارسی Farsi Persian

این نامه و مدارکی که بدست شما رسیده خیلی مهم و قانونی است. اگر شما احتیاج دارید که این نامه و مدارک به زبان فارسی ترجمه بشود لطفت خیلی زود به ماساچوست سازمان محیط زیست (MassDEP) در شماره تلفن ٨٥٧٢٦٢٠٦٠٦ تماس بگیرید.

Français French

Ce document est important et devrait être traduit immédiatement. Si vous avez besoin de ce document traduit, veuillez communiquer avec le directeur de la diversité MassDEP aux numéros de téléphone indiqués ci-dessous.

Deutsch German

Dieses Dokument ist wichtig und sollte sofort übersetzt werden. Sofern Sie eine Übersetzung dieses Dokuments benötigen, wenden Sie sich bitte an den Diversity Director MassDEP unter der unten aufgeführten Telefonnummer.

Ελληνική Greek

Το παρόν έγγραφο είναι σημαντικό και θα πρέπει να μεταφραστεί αμέσως. Αν χρειάζεστε μετάφραση του παρόντος εγγράφου, παρακαλούμε επικοινωνήστε με τον Διευθυντή Διαφορετικότητας του MassDEP στους αριθμούς τηλεφώνου που αναγράφονται παρακάτω.

Italiano Italian

Comunicazione per parti che non parlano inglese. Questo documento è importante e dovrebbe essere tradotto immediatamente. Se avete bisogno di questo documento tradotto, potete contattare il Direttore di Diversità di MassDEP al numero di telefono elencato di seguito.

Język Polski Polish

Dokument ten jest ważny i powinien zostać natychmiast przetłumaczony. Jeśli potrzebujesz przetłumaczonej wersji dokumentu, prosimy o kontakt z dyrektorem ds. różnorodności MassDEP pod jednym z numerów telefonu wymienionych poniżej.

हिन्दी Hindi

यह दस्तावेज़ महत्वपूर्ण है और इसका तुरंत अनुवाद किया जाना चाहिए. यदि आपको इस दस्तावेज़ का अनुवाद करने की आवश्यकता है, तो कृपया नीचे सूचीबद्ध टेलीफोन नंबरों पर मासडेप्स डाइवर्सिटी के निदेशक से संपर्क करें.

Contact **Glynis L. Bugg, Acting Diversity Director/Civil Rights 857-262-0606**

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