



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
**Region 1**  
**5 Post Office Square, Suite 100**  
**BOSTON, MA 02109-3912**

**VIA EMAIL**

September 29, 2023

James Laurila, P.E.  
Director of Water Operations  
Springfield Water and Sewer Commission  
1149 Center St  
Ludlow, MA 01056  
[James.Laurila@waterandsewer.org](mailto:James.Laurila@waterandsewer.org)

Re: Authorization to discharge under the 2023 NPDES Potable Water Treatment Facilities General Permit (PWTFGP) – Authorization No. MAG640022 for the Springfield Reservoir Water Treatment Plant in Ludlow, MA

Dear James Laurila:

Based on the review of your Notice of Intent (NOI) received August 29, 2023, the U.S. Environmental Protection Agency (EPA) hereby authorizes the Springfield Water and Sewer Commission (the Permittee) to discharge from the Springfield Reservoir Water Treatment Plant (the Facility) in accordance with the provisions of the National Pollutant Discharge Elimination System (NPDES) Potable Water Treatment Facilities General Permit (PWTFGP or General Permit). The Facility's General Permit Number is indicated above and should be referenced on all correspondence. The effective date of coverage is November 1, 2023.

Your permitted discharge is to Higher Brook, a Class B freshwater waterbody. Attached to this PWTFGP authorization to discharge is a summary of effluent limitations and monitoring requirements applicable to your discharge. Please be aware that sufficiently sensitive test methods must be used for any sample analysis conducted in accordance with this permit. See Part III.A.1 of the General Permit.

**The summary presented in this authorization letter does not represent the complete requirements of the PWTFGP.** Permittees must comply with all the applicable requirements of this General Permit such as discharge limits and monitoring requirements, state certification conditions, administrative provisions, and other additional requirements including a Best Management Practices (BMP) plan. The complete PWTFGP and other related information can be found at <https://www.epa.gov/npdes-permits/potable-water-treatment-facility-general-permit-pwtf-gp-massachusetts-new-hampshire>.

Please note that Part V of the PWTFGP includes all monitoring, record-keeping and reporting requirements for the Facility that will become effective on the 1st day of the month following the date of signature on this letter. Facilities are now required to submit monitoring results on a

monthly, not quarterly, basis. Unless the Permittee has received an approved Opt-Out Request, the Permittee shall electronically submit its monthly monitoring data in discharge monitoring reports (DMRs) to EPA and the Massachusetts Department of Environmental Protection (MassDEP) using NetDMR. NetDMR is accessed from the internet at <https://cdx.epa.gov>. NetDMR reporting is due no later than the 15th day of the month following the completed reporting period. When DMRs are submitted electronically using NetDMR, the submittal of hard copies is not required.

This General Permit and authorization to discharge expires September 30, 2028, except as provided in Part VI.B, or upon submission of a Notice of Termination. EPA appreciates your cooperation in applying for coverage under this General Permit. If you have additional questions, please contact Nathan Chien at [Nathan.Chien@epa.gov](mailto:Nathan.Chien@epa.gov) or (617) 918-1649.

Sincerely,

Ellen Weitzler, Supervisor  
Industrial and Municipal Permits Section  
Water Division, EPA Region 1

cc: Xiaodan Ruan, MassDEP ([xiaodan.ruan@state.ma.us](mailto:xiaodan.ruan@state.ma.us))  
Susan Tower, SWSC ([sue.tower@waterandsewer.org](mailto:sue.tower@waterandsewer.org))

### Part III. General Permit Requirements

#### A. Effluent Limitations and Monitoring Requirements

##### 1. Emergency and Infrequent Dischargers

Emergency dischargers are defined as those facilities that only discharge in case of an emergency (e.g., rare hydrologic event, treatment system failure, etc.). Infrequent dischargers are those facilities that discharge less than once per month or less than twelve times per year.

During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge wastewaters from potable water treatment facilities to the receiving water in the Permittee's authorization letter, unless the waters are restricted as noted in Section I.C. The discharge and receiving water shall be limited and monitored as detailed below and further specified in the facility's authorization letter.

Effluent Characteristic	Effluent Limitation		Monitoring Requirements <sup>1,2,3</sup>	
	Average Monthly	Maximum Daily	Measurement Frequency	Sample Type <sup>4</sup>
Effluent Flow <sup>5</sup>	Report MGD	1.0 MGD	Continuous	Recorder or Estimate
TSS	30 mg/L	50 mg/L	1/Discharge Event	Composite
pH Range <sup>6</sup>	6.5 – 8.3 S.U.		1/Discharge Event	Grab

##### Footnotes:

1. All samples shall be collected in a manner to yield representative data. A routine sampling program shall be developed in which samples are taken at the same location prior to the discharge mixing with other waste streams and entering the receiving waterbody. The Permittee shall report the results to the Environmental Protection Agency Region 1 (EPA) and the State of any additional testing above that required herein, if testing is in accordance with 40 CFR Part 136. Any change in sampling location from the one specified in the NOI shall be reviewed in writing by EPA and the State.
2. In accordance with 40 CFR § 122.44(i)(1)(iv), the Permittee shall monitor according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O, for the analysis of pollutants or pollutant parameters (except WET). A method is "sufficiently sensitive" when: 1) The method minimum level (ML) is at or below the level of the effluent limitation established in the permit for the measured pollutant or pollutant parameter; or 2) The method has the lowest ML of the analytical methods approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O for the measured pollutant or pollutant parameter. The term "minimum level" refers to either the sample concentration equivalent to the lowest calibration point in a method or a multiple of the method detection limit (MDL), whichever is higher. Minimum levels may be obtained in several ways: They may be

published in a method; they may be based on the lowest acceptable calibration point used by a laboratory; or they may be calculated by multiplying the MDL in a method, or the MDL determined by a laboratory, by a factor.

3. When a parameter is not detected above the ML, the Permittee must report the data qualifier signifying less than the ML for that parameter (e.g., < 50 µg/L, if the ML for a parameter is 50 µg/L). For reporting an average based on a mix of values detected and not detected, assign a value of “0” to all non-detects for that reporting period and report the average of all the results.
4. A “grab” sample is an individual sample collected in a period of less than 15 minutes. When possible, composite samples shall be taken for those parameters identified in the table. A “composite” sample is a composite of at least four (4) grab samples collected at approximately equal intervals on a flow weighted basis during the time at which the discharge is entering the receiving water over an interval representative of the process (e.g., a backwash cycle).
5. The daily maximum flow limit allowed by this General Permit shall be no greater than 1.0 MGD, unless EPA has provided approval for a higher flow rate in the facility’s authorization letter. This may be done on a case-by-case basis. Also report monthly average and maximum daily flow in MGD.
6. The pH shall be within the following range based on State and waterbody classification:  
  
Massachusetts (Class A and B): 6.5 – 8.3 S.U. and the discharge shall not cause a change in pH of the receiving water more than 0.5 S.U. outside of the natural background conditions.

The minimum and maximum pH sample measurement values for the month shall be reported in standard units (S.U.).