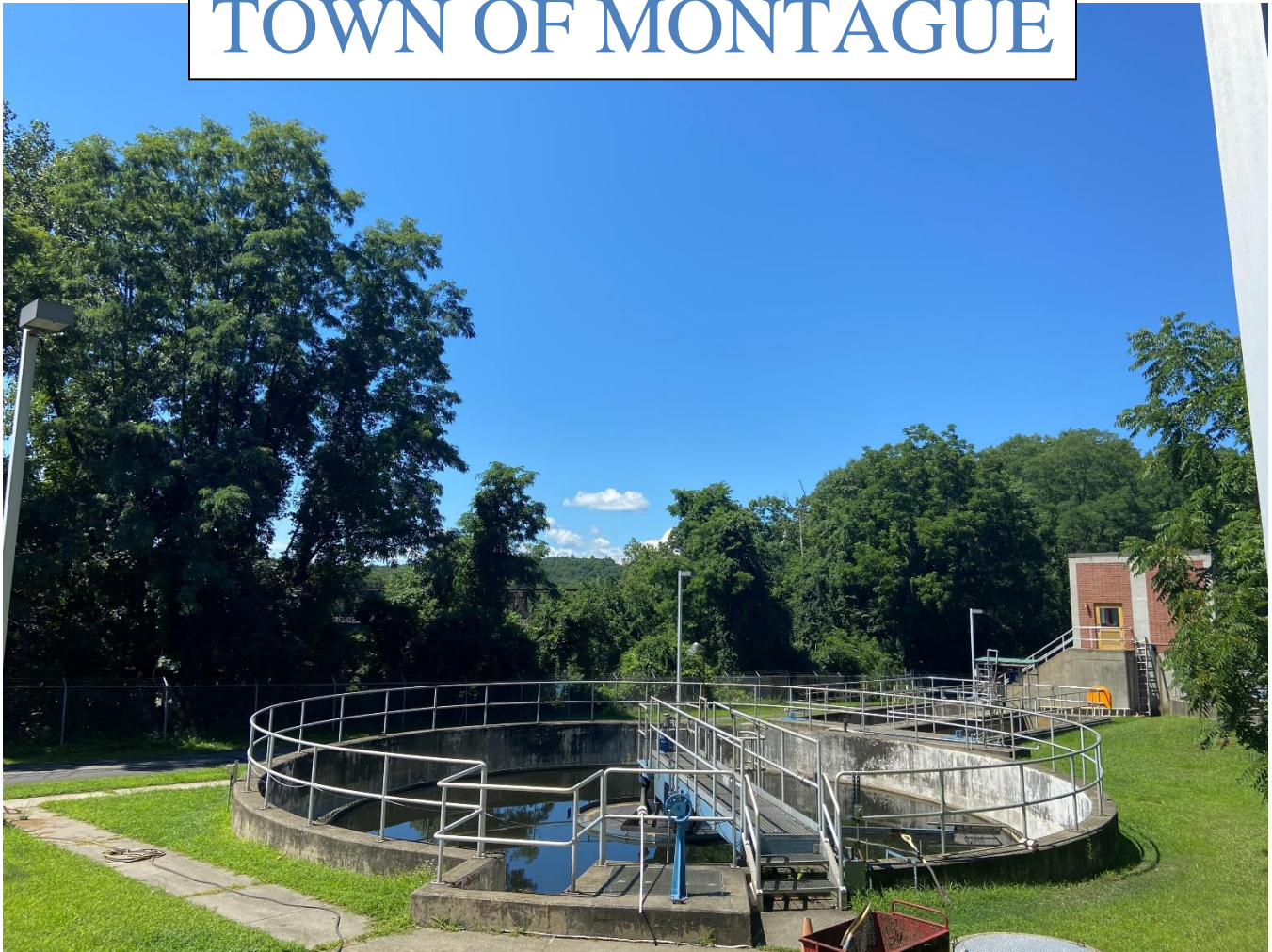


Appendix D
Annual Reports for Industrial Pretreatment
Program



TOWN OF MONTAGUE



WATER POLLUTION CONTROL FACILITY

Pretreatment Annual Report 2021

Chelsey Little, Superintendent
wpcf.supt@montague-ma.gov

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1.0 Introduction

In accordance with the legal authorities, policies, procedures, and financial provisions described in the permittee's Pretreatment Program submission, as approved, and the general pretreatment regulations, 40 CFR 403, enclosed is the yearly summary of compliance, enforcement, and monitoring activities of the Pretreatment Program at the Montague Water Pollution Control Facility. This report fulfills the requirement noted in the NPDES permit Part 1.F.2.b and as required in Attachment C, Industrial Pretreatment Annual Report, of our NPDES permit.

The Town of Montague's Water Pollution Control Facility (WPCF) operates a Grade 6 conventional activated sludge process with a design flow of 1.83 MGD. Flow arrives to the operations building via gravity mains with 8 pump stations and 4 grinder pumps that serve the Villages of Turners Falls, Montague City, Montague Center, Lake Pleasant, and the neighboring town of Gill. It goes through an aerated grit chamber and mechanical bar screen before flowing by gravity through four 34k gallon primary clarifiers. From the primaries, two screw pumps send the primary effluent to two 230k gallon aeration tanks at a higher elevation which are equipped with coarse bubble diffusers provided with air via one 50hp and two 100hp blowers. Secondary clarification takes place in two 50 ft. diameter clarifiers with the secondary effluent flowing into two 25k gallon chlorine contact chambers, where it is disinfected with chlorine gas before discharging into the Connecticut River.

The facility has seven Massachusetts State licensed operators on staff, and one Administrative Assistant.

2.0 Program Activities (January 1, 2021 to December 31, 2021)

The facility has been through heavy staff turnover over the last year and a half, with notable loss to the Chief Operator, who served as the Pretreatment Coordinator for the Town. Unfortunately, at the time of this writing the Town has been unable to replace the position and the Superintendent has stepped in to assist with the Pretreatment Coordination for the Town.

As a first step to maintaining compliance with the Pretreatment Program, the facility began consolidating its SIUs in a more defined and organized manner. The industrial filing system was overhauled and arranged more efficiently. A monthly review sheet for SIU reports was re-implemented in order to preliminarily review reports for any potential violations. Final review of reports and violations are then conducted by the Superintendent. This assisted in real time monitoring of submitted reports, on a more frequent basis than had been done previously. This work was also done on the backlogged two years of industrial reporting by SIUs, in order to get back on track with monitoring. As of the writing of this report, the facility has not yet had a chance to evaluate the potential for significant non-compliance over the last two years' worth of reporting by SIUs.

The facility conducted a review of Judd Wire, Inc (a wire extrusion facility) and the potential it may fall under copper forming rule and become a new SIU. After research and investigation with Judd Wire, Inc and Tighe and Bond Engineering Firm, it was found that Judd Wire did not classify under the rule, as they do not discharge their copper forming waste to the wastewater facility, instead they have it separated and hauled off site.

In October, the facility conducted a review of the One-Time Compliance Report for Dental Discharges and found no previous forms or inspections of the Town's four dental offices had been conducted. This review was triggered by high mercury levels seen in recent sludge analysis. The Town went around to all four offices and informed them of the update to the law, supplied the One-Time Compliance Report, along with an informational sheet regarding amalgam separators and the need for compliance to protect wastewater facilities and receiving streams from mercury.

The Town also sent a notice to its two SIUs regarding slug loading discharges during wet weather/combined sewer overflow events, advising them to cease all discharges during these event times, in order to protect the receiving waters from potentially untreated industrial waste. Septic haulers were also advised of the new policy to limit septage receiving during wet weather events, and an OPEN/CLOSED sign for septage receiving was posted for haulers. (The sign is manually turned over to CLOSED during a wet weather event, and haulers are not permitted to dump until the event concludes.)

A recently opened marijuana grow facility, 253Farmacy, was found to have no previous baseline monitoring for nutrients. The Town is working with the industry to conduct nutrient sampling and analysis for ammonia/nitrogen and phosphorous levels.

3.0 Future Program Activities

Although the Town was able to conduct its required annual inspections and sampling for 2021, the Town plans on having a more frequent sampling and inspection schedule in order to better monitor SIUs. The WPCF has submitted a proposal to the Town Boards/Committees for a new Laboratory Manager position, in addition to normal staffing, who would take on the additional sampling and analysis of SIUs. As of the writing of this report, the WPCF has received positive indications that the position will be approved by the Town.

The facility is also aware of several micro-breweries that have established themselves in Town and plans to sample these facilities on a more regular basis in order to determine their potential for heavy BOD loading to the facility.

4.0 SIU Updates/Highlights

Lightlife Foods, Inc: Lightlife Foods, Inc was issued a \$252,000 fine by EPA for violating Clean Water Act from low pH discharges downstream.

The industry's equalization tank and oil and grease separator were placed online in March. When the system is used correctly, it has drastically decreased the observance of low pH, and high oil and grease loadings.

The Town worked with DEP and EPA on grading Lightlife's facility, and ultimately required Lightlife to have a licensed Grade 2I Chief Operator, and licensed operators on staff during every shift.

The Town also required Lightlife to have a Slug Loading Plan, where if their pH drops out of permit range, they will cease all discharges to the wastewater facility, until the issue is resolved. This was in response to several incidents where low pH was still sent to the WPCF, without immediate cessation of discharge by Lightlife, causing longer permit violation discharges to be experienced downstream.

Great Falls Aquaculture: Great Falls advised they were stalled on the implementation of their digester due to capital restraints. There is no timeline for this project to be completed.

5.0 Procedures for Ensuring Annual Inspections and Analyzing for All Pollutants

The Montague Industrial Pretreatment Program has been updated to include an inspection frequency and sampling procedures. The section advises the Superintendent/Pre-Treatment Coordinator of expected inspection frequencies and sampling plans which includes the analysis of all pollutants that the industrial user is required to monitor for.

6.0 Procedures for Ensuring Appropriate Remedies are Taken for Noncompliance

Appropriate remedies taken for non-compliance by an industrial user are located both within the Town of Montague Sewer User Ordinance, Article X Enforcement, Sec. 7 Industrial Pretreatment Enforcement and the Montague WPCF Industrial Pretreatment Program's Enforcement Response Plan. Some of the actions for noncompliance include but are not limited to:

- Notice of Violations
- Public Notification of Violations
- Consent Orders
- Show Cause Hearings
- Civil Penalties
- Non-Criminal Disposition
- Civil Litigation
- Criminal Prosecution
- Termination of Service

7.0 Baseline Monitoring Report for Newly Promulgated Industries

There were no baseline monitoring reports done for new industries for this reporting period. (No new SIUs.)

8.0 Compliance Status Reporting Requirements for Newly Promulgated Industries

There are no new SIUs which require reporting.

9.0 Periodic Monitoring Reports

1. Great Falls Aquaculture - Reports provided monthly.
2. Lightlife Foods, Inc. - Reports provided monthly.

10.0 Compliance and Enforcement Activities

Despite the ongoing COVID-19 pandemic and staff turnover, the facility was able to conduct the minimum required annual on-site inspections with pandemic precautionary measures in place.

Company	Inspection Date	Sample Dates
Great Falls Aquaculture	12/08/2021	12/08/2021
LightLife Foods Inc.	11/03/2021	12/02/2021

Lightlife Foods, Inc: In April, the Town issued Lightlife a Notice of Violation and Compliance Order.

Great Falls Aquaculture: The last quarter of sampling and reporting from Great Falls showed a trending increase in TSS loading violations. As of the writing of this report, the Town has been working with Great Falls to address the high TSS.

11.0 Significantly Violating Industries

Lightlife Foods, Inc: Although the Town is backlogged on calculating significant non-compliance for 2021, Lightlife is observed to be in violation of their permit, specifically regarding: BOD, TSS, reporting, monitoring, pH, and temperature.

In June, the Town published a public notice of Significant Non-Compliance from the previous year's violations for Lightlife.

12.0 Summary of Pollutant Analytical Results

Montague Wastewater Treatment Plant Effluent Data from Toxicity Testing

Metals	units	6/09/20	9/08/20	7/15/21	9/08/21
Cadmium	ug/l	0.25	0.25	ND	ND
Chromium	ug/l	2.2	1.8	ND	0.0042
Copper	ug/l	4.8	5.0	0.0063	0.0065
Lead	ug/l	1.25	1.25	ND	0.0010
Nickel	ug/l	5.6	3.6	0.0036	0.0046
Zinc	ug/l	36	53	0.013	0.079

Summary of Sludge Data from TCLP

Parameter	Units	2020 TCLP	2021 TCLP
Arsenic	mg/L	0.0085	0.0061
Barium	mg/L	0.30	0.18
Cadmium	mg/L	ND	ND
Chromium	mg/L	ND	ND
Lead	mg/L	ND	ND
Mercury	mg/L	ND	ND
Silver	mg/L	ND	ND
Selenium	mg/L	ND	ND
Zinc	mg/L	N/A	N/A

13.0 Local Limits

On April 9, 1998 the Town of Montague submitted a Local Limit Plan to EPA. Based on analysis of the maximum pollutant concentrations in the final effluent, sludge and the combined influent, there were no pollutants identified as requiring control through local industrial pretreatment limits. On November 18, 1999 the facility received a letter from EPA stating that they concurred with the conclusion that technically-based local limits were not needed at that time. As part of the NPDES permit that became effective November 1, 2008, the evaluation of the need for site-specific local industrial pretreatment limits

for the Town of Montague has been completed.

Despite this information, the facility hopes to conduct a local limits evaluation in the near future in order to have a more recent review, especially since the shutdown of both paper mills and the increase in production experienced with Lightlife Foods, Inc.

Respectfully,

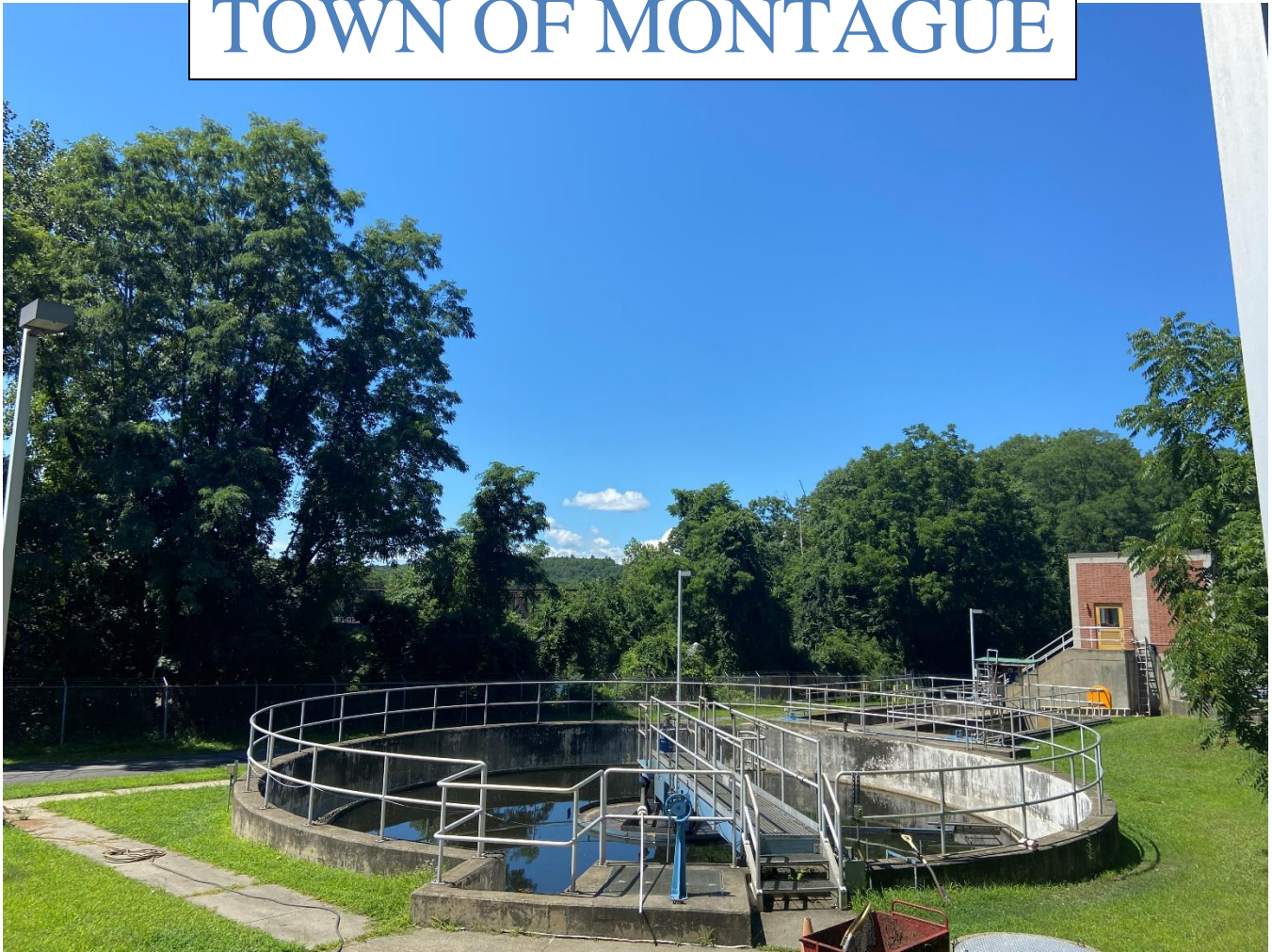
A handwritten signature in cursive script, appearing to read "Chelsey Little".

Chelsey Little, BSBS MPH
Superintendent
Montague Water Pollution Control Facility
34 Greenfield Rd, Montague, MA 01351
413-773-8865

14.0 EPA Region 1 Annual Pretreatment Report Summary Sheet

POTW Name	Town of Montague, MA
NPDES Permit #	MA0100137
Pretreatment Report Period Start Date	January 1, 2021
Pretreatment Report Period End Date	December 31, 2021
# of Significant Industrial Users (SIU's):	2
# of SIU's without control mechanisms:	0
# of SIU's not inspected:	0
# of SIU's not sampled:	0
# of SIU's in Significant Non Compliance (SNC)	
with pretreatment standards:	1
# of SIU's in SNC with Reporting Requirements:	1
# of SIU's in SNC with Pretreatment Compliance Schedule:	0
# of SIU's in SNC Published in Newspaper:	1
# of SIU's with Compliance Schedules:	0
# of Violation Notices issued to SIU's:	1
# of Administrative Orders issued to SIU's:	0
# of Civil Suits filed against SIU's:	0
# of Criminal Suits filed against SIU's:	0
# of Categorical Industrial Users (CIU's):	0
# of CIU's in SNC:	0
<u>Penalties</u>	
Total dollar amount of penalties collected:	0
# of IU's from which penalties have been collected:	0
<u>Local Limits</u>	
Date of most recent Technical Evaluation of Local Limits:	April 6, 1998
Date of most recent adoption of Technically Based Local Limits:	N/A

TOWN OF MONTAGUE



CLEAN WATER FACILITY MA0100137

Industrial Pretreatment Annual Report 2022

Chelsey Little, Superintendent
wpcf.supt@montague-ma.gov
March 1, 2023

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1.0 Introduction

In accordance with the legal authorities, policies, procedures, and financial provisions described in the permittee's Pretreatment Program submission, as approved, and the general pretreatment regulations, 40 CFR 403, enclosed is the yearly summary of compliance, enforcement, and monitoring activities of the Pretreatment Program at the Montague Clean Water Facility. This report fulfills the requirement noted in the NPDES permit Part 1.F.2.b and as required in Attachment C, Industrial Pretreatment Annual Report, of our NPDES permit.

The Town of Montague's Clean Water Facility (CWF) operates a Grade 6 conventional activated sludge process with a design flow of 1.83 MGD. Flow arrives to the operations building via gravity mains with 8 pump stations and 4 grinder pumps that serve the villages of Turners Falls, Montague City, Montague Center, Lake Pleasant, and the neighboring town of Gill. It goes through an aerated grit chamber and mechanical bar screen before flowing by gravity through four 34k gallon primary clarifiers. From the primaries, two screw pumps send the primary effluent to two 230k gallon aeration tanks at a higher elevation which are equipped with coarse bubble diffusers provided with air via one 50hp and two 100hp blowers. Secondary clarification takes place in two 50ft. diameter clarifiers with the secondary effluent flowing into two 25k gallon chlorine contact chambers, where it is disinfected with sodium hypochlorite (aq) before discharging into the Connecticut River.

The facility has eight Massachusetts State licensed operators on staff, and one Administrative Assistant.

2.0 Industrial Users

<u>Company</u>	<u>Address</u>	<u>Description</u>	<u>Standards</u>	<u>Permit Status</u>	<u>Baseline Monitoring</u>
Lightlife Foods, Inc	153 Industrial Blvd	Soy based food processing	SIU	August 2024	N/A
Great Falls Aquaculture	1 Australia Way	Aquaculture(raising Barramundi)	SIU	August 2024	N/A
Johnson Controls/Heatfab	130 Industrial Blvd	Metal fabrication	N/A	N/A	N/A
Hillside Plastics	262 Millers Falls Rd	Molded plastics	N/A	N/A	N/A
Judd Wire	124 Turnpike Rd	Wire drawing and insulating	N/A	N/A	N/A
Mayhew Steel	199 Industrial Blvd	Metal parts fabrication	N/A	N/A	N/A
Charter NEX	18 Industrial Blvd	Extruding of plastic films	N/A	N/A	N/A
253 Farmacy	253 Millers Falls Rd	Cannabis grow/process/retail	N/A	N/A	N/A

Brick and Feather Brewery	78 11 th St	Microbrewery	N/A	N/A	N/A
Pioneer Valley Brewery	151 3 rd St	Microbrewery	N/A	N/A	N/A
Doyle's Car Wash	1 Montague city Rd	Car wash (3 bay)	N/A	N/A	N/A
Deerfield Steel	199 Industrial Blvd	Metal parts fabrication	N/A	N/A	N/A
Duravent-Hart and Cooley	130 Industrial Blvd	Chimney liners	N/A	N/A	N/A

3.0 Dental Offices

<u>Company</u>	<u>Address</u>	<u>Number</u>	<u>Certification Form</u>
Turners Falls Dental	7 Burnham St	413-774-6553	November 2021
Community Health Center	338 Montague City Rd	413-772-3748	November 2021
Montague Dental	4 Dell St #101	413-863-9656	November 2021
Apex Dental Associates of Turners Falls	173 Avenue A	413-863-2296	November 2021

4.0 Program Activities (January 1, 2022, to December 31, 2022)

The facility has seen a stabilization in staffing as compared to the previous reporting year. Part of the update to the program was the addition of a dedicated full-time Laboratory Manager, who oversees collecting and analyzing samples from industrial users, as well as performing inspections under the guidance of the Foreman and/or Superintendent.

A monthly review sheet for SIU reports is utilized and shared with the Foreman and Laboratory Manager to preliminarily review reports for any potential violations. Final review of reports and violations are then conducted by the Superintendent. This assists in real time monitoring of submitted reports.

The facility sends an annual notice to its two SIUs regarding slug loading discharges during wet weather/combined sewer overflow events, advising them to cease all discharges during these event times, to protect the receiving waters from potentially untreated industrial waste. Septic haulers are also annually advised of the policy to limit septage receiving during wet weather events, and an OPEN/CLOSED sign for septage receiving is posted for haulers. (The sign is manually turned over to CLOSED during a wet weather event, and haulers are not permitted to dump until the event concludes.)

A recently opened marijuana grow facility, 253Pharmacy, was sampled for nutrient sampling and analysis for ammonia/nitrogen and phosphorous levels on Feb 18, 2022. (See summary table below)

<u>Parameter</u>	<u>Result</u>	<u>Units</u>
Ammonia	3.54	mg/L
Nitrate	139	mg/L
Inorganic Nitrogen	143	mg/L
Phosphorous	116	mg/L

Superintendent Little and Laboratory Manager Diamond both attended the EPA Annual Industrial Pretreatment conference held on October 25th-27th.

5.0 Future Program Activities

Sampling is one of the primary goals for 2023. More frequent sampling of the industrial users and of certain points in the collection system will help to pinpoint potential issues with contaminants, especially with emerging chemicals of concern such as PFAS/PFOS.

The facility would also like to conduct a local limits evaluation, particularly since industry has changed drastically from limits developed in 1998. There are no longer paper mills discharging to the POTW, and the Town has seen a recent uptick in breweries and marijuana grow facilities. This requires the need to establish updated limits which are important to the overall success of the program, as well as in maintaining justifiable limits for future SIU permits.

6.0 SIU Updates/Highlights

Lightlife Foods, Inc:

In February 2022, the facility observed high Cl₂ residuals in Lightlife samples. After investigation and meetings with Lightlife personnel, it was found that Lightlife was over chlorinating overnights, during their cleaning shift. This created a passthrough into the final effluent of the facility. (See incident report on file for more information.)

In September 2022, Lightlife advised they are cutting production from 3 shifts down to 1 shift. Most of the reduction would occur with the tempe product that causes bulking issues in the clarifiers at the CWF.

Also in September 2022, Lightlife experienced upper management turnover. The CWF met with new management to discuss updates/concerns. Also looked at pretreatment system and FOG separator.

Great Falls Aquaculture:

In February 2022, the facility met with Great Falls regarding high levels of TSS observed since October 2021.

Great Falls Aquaculture looking into internal process control and future sludge removal to comply with TSS.

7.0 Periodic Monitoring Reports

1. Great Falls Aquaculture - Reports provided monthly.
2. Lightlife Foods, Inc. - Reports provided monthly.

8.0 Compliance and Enforcement Activities

The facility was able to conduct the minimum required annual on-site inspections.

The facility was not able to collect a sample from Great Falls Aquaculture during 2022.

Corrective Action: The facility was in transition with training the Laboratory Manager position and the sampling for Great Falls Aquaculture was inadvertently missed. The new position is now responsible for collecting and analyzing samples, and a sample plan has been implemented with more frequent sampling. The Foreman, another newly adopted position, is also responsible for overseeing the program annual inspection and sampling requirements in conjunction with the Laboratory Manager and Superintendent.

Company	Inspection Date	Sample Dates
Great Falls Aquaculture	12/09/2022	---
LightLife Foods Inc.	12/08/2022	1/27/22, 2/07/22

Lightlife Foods, Inc:

February 8, 2022-Issued an immediate monitoring requirement for total residual chlorine. (A copy of the letter is on file.)

Great Falls Aquaculture:

In February 2022, the facility met with Great Falls regarding high levels of TSS observed October 2021-May 2022. (Investigation Report on file.)

9.0 Significantly Violating Industries

Great Falls Aquaculture

August 2, 2022- Issued NOV and Compliance Order for Significant Non-Compliance observed with TSS limits during the period of October 2021-May2022. (A copy of the NOV is on file.)

August 4, 2022- Issued a public notice of Significant Non-Compliance in the Greenfield Recorder from the violations of TSS.

December 2022- Returned to compliance.

10.0 Procedures for Ensuring Annual Inspections and Analyzing for All Pollutants

The Montague Industrial Pretreatment Program has been updated to include an inspection frequency and sampling procedures. The section advises the Superintendent/Pre-Treatment Coordinator/Laboratory Manager of expected inspection frequencies and sampling plans which includes the analysis of all pollutants that the industrial user is required to monitor for.

11.0 Procedures for Ensuring Appropriate Remedies are Taken for Noncompliance

Appropriate remedies taken for non-compliance by an industrial user are located both within the Town of Montague Sewer User Ordinance, Article X Enforcement, Sec. 7 Industrial Pretreatment Enforcement and the Montague CWF Industrial Pretreatment Program's Enforcement Response Plan. Some of the actions for noncompliance include but are not limited to:

- Notice of Violations
- Public Notification of Violations
- Consent Orders
- Show Cause Hearings
- Civil Penalties
- Non-Criminal Disposition
- Civil Litigation
- Criminal Prosecution
- Termination of Service

12.0 Baseline Monitoring Report for Newly Promulgated Industries

There were no baseline monitoring reports done for new industries for this reporting period. (No new SIUs.)

13.0 Compliance Status Reporting Requirements for Newly Promulgated Industries

There are no new SIUs which require reporting.

14.0 Trucked or Hauled Waste

The CWF currently accepts septage as hauled waste. (Both in-town and out-of-town septage.)

Location designated for receipt of trucked or hauled waste: Septage Receiving Station located prior to the headworks of the facility.

15.0 Summary of Pollutant Analytical Results

Toxicity Testing Metals: Effluent

<u>Metals</u>	<u>11/02/2022</u>	<u>Unit</u>
Arsenic	ND	mg/L
Barium	0.038	mg/L
Cadmium	ND	mg/L
Chromium	ND	mg/L
Copper	0.0063	mg/L
Lead	ND	mg/L
Nickel	ND	mg/L
Selenium	ND	mg/L
Zinc	0.043	mg/L
Mercury	ND	mg/L

Toxicity Testing Metals: Influent

<u>Metals</u>	<u>11/02/2022</u>	<u>Unit</u>
Arsenic	ND	mg/L
Barium	0.076	mg/L
Cadmium	ND	mg/L
Chromium	ND	mg/L
Copper	0.051	mg/L
Lead	ND	mg/L
Nickel	0.0048	mg/L
Selenium	ND	mg/L
Zinc	0.17	mg/L
Mercury	ND	mg/L

Toxicity Testing Metals: Sludge

<u>Metals</u>	<u>11/02/2022</u>	<u>12/05/2022</u>	<u>Unit</u>
Arsenic	3.6	-	mg/Kg
Arsenic	-	0.0082	mg/L
Barium	190	-	mg/Kg
Barium	-	0.23	mg/L
Cadmium	1.2	-	mg/Kg
Cadmium	-	ND	mg/L
Chromium	15	-	mg/Kg
Chromium	-	ND	mg/L
Copper	500	-	mg/Kg
Lead	27	-	mg/Kg
Lead	-	ND	mg/L
Nickel	14	-	mg/Kg
Selenium	4.7	-	mg/Kg
Selenium	-	ND	mg/L
Zinc	970	-	mg/Kg
Molybdenum	7.2	-	mg/Kg
Beryllium	0.086	-	mg/Kg
Mercury	1.0	-	mg/Kg
Iron	5100	-	mg/Kg
Aluminum	1900	-	mg/Kg
Phosphorus	11000	-	mg/Kg
Silver	-	ND	mg/L

16.0 Local Limits

On April 9, 1998 the Town of Montague submitted a Local Limit Plan to EPA. Based on analysis of the maximum pollutant concentrations in the final effluent, sludge and the combined influent, there were no pollutants identified as requiring control through local industrial pretreatment limits. On November 18, 1999 the facility received a letter from EPA stating that they concurred with the conclusion that technically-based local limits were not needed at that time. As part of the NPDES permit that became effective November 1, 2008, the evaluation of the need for site-specific local industrial pretreatment limits for the Town of Montague has been completed.

Despite this information, as described above, the facility hopes to conduct a local limits evaluation in the near future in order to have a more recent review, especially since the shutdown of both paper mills and the increase in other industry types with potential for heavy loadings.

Respectfully,



Chelsey Little, BSBS MPH
Superintendent
Montague Clean Water Facility
34 Greenfield Rd, Montague, MA 01351
413-773-8865

17.0 EPA Region 1 Annual Pretreatment Report Summary Sheet

POTW Name	Town of Montague, MA
NPDES Permit #	MA0100137
Pretreatment Report Period Start Date	January 1, 2022
Pretreatment Report Period End Date	December 31, 2022
# of Significant Industrial Users (SIU's):	2
# of SIU's without control mechanisms:	0
# of SIU's not inspected:	0
# of SIU's not sampled:	1
# of SIU's in Significant Non Compliance (SNC)	
with pretreatment standards:	1
# of SIU's in SNC with Reporting Requirements:	0
# of SIU's in SNC with Pretreatment Compliance Schedule:	0
# of SIU's in SNC Published in Newspaper:	1
# of SIU's with Compliance Schedules:	1
# of Violation Notices issued to SIU's:	1
# of Administrative Orders issued to SIU's:	0
# of Civil Suits filed against SIU's:	0
# of Criminal Suits filed against SIU's:	0
# of Categorical Industrial Users (CIU's):	0
# of CIU's in SNC:	0
<u>Penalties</u>	
Total dollar amount of penalties collected:	0
# of IU's from which penalties have been collected:	0
<u>Local Limits</u>	
Date of most recent Technical Evaluation of Local Limits:	April 6, 1998
Date of most recent adoption of Technically Based Local Limits:	N/A