



MILFORD WATER COMPANY

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October 22, 2013

Paula Caron
Department of Environmental Protection
Central Regional Offices
627 Main Street
Worcester, Ma. 01608

Dear Paula,

In response to the Public Notice and Treatment Technique Violation the Company offers the following proposed corrective actions for your review and comment.

Corrective action that was taken once the turbidity levels leaving the filters began to escalate:

- The source of elevated turbidity was shut down. This source was from the drain down of the lagoon to the recycle tank.
- A sequential backwash routine was initiated for the three filters.
- Additional attention was placed on maintaining appropriate residual chlorine levels leaving the plant.

Corrective actions that have been taken or are planned to be implemented to help avoid any future violations:

- The existing raw water turbidity meter readout was rescaled from 0-5 NTU to 0-20 NTU to allow for better monitoring and anticipation of potential treatment disruptions.
- The MWC is receiving proposals to have a new turbidity meter installed for additional monitoring on the recycle water line.
- The MWC is receiving proposals to have a decant system added to the spent washwater tanks. The decant system will improve water quality coming from the recycled water and reduce the likelihood of turbidity breakthrough during the recycle operation.
- The SCADA system incorporated and tested additional turbidity alarm set points. Alarm notification set points were added for the raw water, DAF clarified water,

- and GAC filtered water turbidity measurements in order to notify operators prior to reaching the maximum limits set by the EPA.
- After the initial warning alarm notification, a second alarm set point on the DAF clarified water turbidity will automatically shut down the treatment plant on a high clarified water turbidity alarm. This allows the operator to perform corrective action prior to approaching any violation criteria.
- After the initial warning alarm notification, a second alarm set point on the GAC filtered water turbidity will automatically shut down the treatment plant on a high filtered water turbidity alarm. This allows the operator to perform corrective action prior to exceeding the maximum turbidity limit.
- Alarms shall be tested on a regular basis to help mitigate any issues with the SCADA and/or notification system.

Regards,

David L. Condrey
Manager, Milford Water Company