



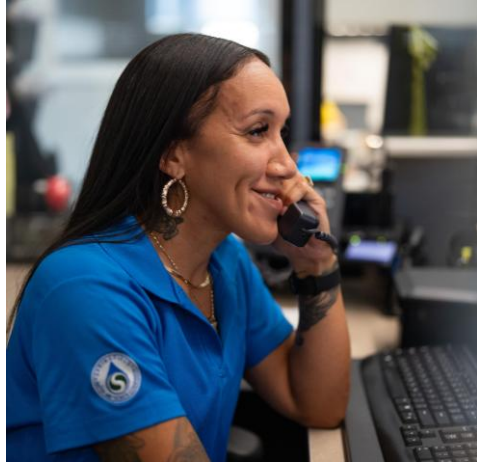
Enforcement Case-Study of a Dairy Processor

Presented by:

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**Springfield Regional Wastewater
Treatment Facility on Bondi's Island**

Agawam, MA



Who We Are

- Independent, public, regional utility
- Governed by 3-member Board of Commissioners appointed by Mayor, approved by City Council
- Providers of essential services to protect public health and safety for Springfield and wastewater service for 7 communities.



Wastewater Service Map



Retail Wastewater Community 
Wholesale Wastewater Community 

SWSC IPP General Information

Relevant Limits (based on SWSC's Rules and Regulations):

- pH: 5.5-10.5 S.U.
- FOG: 100mg/L

Cost Recovery:

- Total cost of the program is recovered from our SIUs on an annual basis
- Cost divided amongst the SIUs based on a point system
- Points based on BOD/TSS loadings, flow, and enforcement

SWSC IPP's Enforcement System

Formal:

- Tier 1: Notice of Violation (NOV) – one enforcement point
- Tier 2: Notice of Non-Compliance (NON) – three enforcement points
- Tier 3: Significant Non-Compliance (SNC) – seven enforcement points

Informal:

- Phone calls
- Area of Concern (AOC) letters

**Our Enforcement Response Plan (ERP) outlines the escalation required
for each type of permit violation or issue**

The Cream Spill

A permitted dairy SIU, on a compliance schedule since June 2024 for chronic pH and FOG violations.

- IPP received a spill notification on May 26th, 2025, that occurred from 14:00 to 15:30. Approximately 600 gallons of cream was discharged to the sewer system and eventually the town's sewer system.
- An onsite inspection occurred on May 27th, 2025, where it discovered operators were advised to bypass a clean in place (CIP) and place another separator online to meet a quota.
- The operator took the following video of cream overflowing and going down the drain to the pretreatment system.

“Look at all that money
hittin’ the drain!”



Results of the Cream Spill

- The spill caused an electrical surge in the aeration basins at the POTW.
- EPA conducted an Audit at the facility on June 12th, 2025.
- SIU received a SNC for the slug discharge to the POTW and the electrical surge that occurred at the aeration basins.
- IWDP modified to increase testing of BOD/TSS and FOG from 1x/week to 3x/week.
- The facility was required to create a new Compliance Schedule that would address both slug discharges and pH/FOG violations.
- The facility received enforcement penalties on their annual bill. SWSC has a cost recovery billing system.
- Random weekly inspections.
- Facility required to submit cleanout manifests from grease and grit traps quarterly.

Dairy Processor pH, Flow monitors & Autosampler



Facility's pH/flow monitors



Facility's auto sampler

Current Status of the Facility

- The facility created SOPs, preventative maintenance measures, improved communication strategies, and violation follow-up procedures.
- The facility obtained an engineering company to evaluate the wastewater characteristics and possible treatment upgrades to address violation concerns.
- The facility completed a new engineering study in August 2026 and is now working on a treatability study and a design for a treatment system.



Aeration Basins, Bondi's Island

Questions?

