



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
5 POST OFFICE SQUARE SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

January 28, 2021

David Coppes, Chief Operating Officer
Massachusetts Water Resources Authority
Charlestown Navy Yard
100 First Avenue, Building 39
Boston, MA 02129

Re: Final Ambient Monitoring Plan Proposed Revision
Permit Number MA 0103284

Dear Mr. Coppes:

EPA received your request on November 13, 2020 to revise the 2010 Ambient Monitoring Plan. As you know, this is the Annual request as required in the NPDES Permit¹, following up to the Interim request submitted in June 2020. EPA Region 1 approved the Interim request and approves this Annual request for the reasons articulated in our letter of July 5, 2020 and summarized below.

The MWRA specifically requested the following changes to the Ambient Monitoring Plan for the Massachusetts Water Resources Authority Effluent Outfall Revision 2, July 2010.²

- End the monitoring, described in section 4.3 of the 2010 plan, of chemical contaminants in soft sediments in the nearfield and farfield of the outfall site scheduled for every third year, starting this August (2020);
- End the annual monitoring, described in section 4.3 of the 2010 plan, of soft sediments in western Massachusetts Bay using sediment profile imaging, starting in August 2020; and
- Discontinue monitoring two reference stations (Nantasket Beach and eastern Cape Cod Bay), described in section 5.3, for histological analysis of winter flounder liver tissue. Sampling at all four sites occurred in early May 2020. Continue to monitor fish on Deer Island Flats (Boston Harbor) and near the outfall site starting in April 2021.

The OMSAP discussed these issues at *ad hoc* committee meetings in 2019, and at the full OMSAP meeting on October 3, 2019 in Scituate. At this meeting, the OMSAP voted in favor of these changes.

¹ Parts 7.c.iii at <https://www3.epa.gov/region1/npdes/mwra/pdf/mwrafpm1.pdf>

² <http://www.mwra.state.ma.us/harbor/enquad/pdf/2010-04.pdf>

EPA agrees that these changes are reasonable for several reasons outlined below. At an *ad hoc* committee in 2019, the OMSAP discussed several criteria for acceptance of revisions. They include:

- Whether monitoring data show improving trends below established thresholds in the Contingency Plan;
- Whether there are other data (including effluent data) or technologies that can provide information that gives us confidence that we are addressing the monitoring question; and
- Whether other monitoring adequately allow us to evaluate whether water quality standards are being met.

Regarding the contaminant monitoring in sediments, the trends show consistent decreases, concentrations are below levels considered harmful, and monitoring for contaminants at low detection limits in the effluent are continuing.

Regarding the sediment profile imaging, the data show improving and well oxygenated sediments. Soft sediment will continue to be collected for benthic community composition, and the MWRA will gather qualitative observations of oxygen in sediments.

Regarding the flounder monitoring, the data show dramatic improving trends in health of flounder, and background sites have consistently shown low levels of flounder disease.

The proposed revision was posted by the MWRA on its website and, as required by the permit, the Environmental Monitor. EPA Region 1 also distributed this proposal to the OMSAP, the Public Interest Advisory Committee to the OMSAP, and to the Interagency Advisory Committee to the OMSAP. We received comments from the OMSAP chair (Dr. Judith Pederson) and Bruce Berman of Save the Harbor/Save the Bay, writing on behalf of the Public Interest Advisory Committee. Both comment letters strongly supported these revisions. For the record, it is appropriate to include this paragraph from Mr. Berman's letter:

The three proposed changes have been the subject of thoughtful discussion and thorough review by the members of OMSAP and PIAC in an open and inclusive process that has included both the regulators and the public over the past two years. I believe that the proposed changes are modest and appropriate and am pleased to note that they will not affect other studies included in the monitoring plan, and that the MWRA will continue to monitor flounder on Deer Island flats and near the outfall site itself, and consider such other studies as appear necessary and appropriate.

We assume that these revisions will be reflected in the next publication of the Ambient Monitoring Plan. Thank you again for the contributions of your staff to the OMSAP evaluation process. If you have any questions, feel free to contact me via email at liebman.matt@epa.gov.

Sincerely,

Matthew Liebman, Ph.D.
National Estuary Program Section and Marine Protection Section

cc:

Dr. Judith Pederson, OMSAP Chair
Bruce Berman, OMSAP PIAC Chair
Susannah King, MA DEP
Cathy Vakalopoulos, MA DEP
Karen McGuire, EPA Region 1 Enforcement and Compliance Assurance Division
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