



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

July 6, 2020

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

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

Dear Mr. Coppes:

With this letter, EPA Region 1 acknowledges that we do not object to the three Ambient Monitoring Plan revisions proposed in your June 5, 2020 letter. The MWRA specifically requests the following changes to the Ambient Monitoring Plan for the Massachusetts Water Resources Authority Effluent Outfall Revision 2, July 2010.¹

- 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.

These requests are made through the *Interim* process described in the permit at Parts 7.c.iii (<https://www3.epa.gov/region1/npdes/mwra/pdf/mwrafpm1.pdf>).

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.

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:

¹ <http://www.mwra.state.ma.us/harbor/enquad/pdf/2010-04.pdf>

- 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 proposal was posted by the MWRA on its website and widely distributed. 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 a few comments, which were in favor of the planed revisions.

As you know, pursuant to the MWRA National Pollutant Discharge Elimination Program Permit Number MA0103284, Part I, section 8.c. these interim modifications must be included in an annual submission of proposed modifications by November 15, 2020. If you have any questions, feel free to contact me via email at liebman.matt@epa.gov or by phone at 617-918-1626.

Thank you.

Matthew Liebman
National Estuary Program Section and Marine Protection Section

cc:

Dr. Judith Pederson, OMSAP Chair

Susannah King, MA DEP

Cathy Vakalopoulos, MA DEP

Karen McGuire, EPA Region 1 Enforcement and Compliance Assurance Division

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