



# Center for Coastal Studies Provincetown

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November 28, 2023

Michele Barden  
U.S. Environmental Protection Agency – Region 1  
5 Post Office Square, Suite 100 (06-1)  
Boston, MA 02109-3912

Submitted via email to: [barden.michele@epa.gov](mailto:barden.michele@epa.gov)

Claire Golden  
MassDEP, Surface Water Discharge Program  
150 Presidential Way  
Woburn, MA 01801

Submitted via email: [MassDEP.npdes@mass.gov](mailto:MassDEP.npdes@mass.gov)

Dear Ms. Barden and Ms. Golden,

The Center for Coastal Studies (CCS) appreciates the opportunity to provide comments to the US EPA Region 1 and to MassDEP on the draft National Pollutant Discharge Elimination System (NPDES) permit issued to the Massachusetts Water Resources Authority (MWRA) Deer Island Treatment Plant and Combined Sewer Overflow (CSO) (MA0103284). CCS has been contracted by MWRA since 2010 to monitor three of the farfield stations: two in Cape Cod Bay (CCB) and one near Stellwagen Bank National Marine Sanctuary (SBNMS). Based on our experience monitoring these stations, we would recommend the following revisions to the Draft Permit:

Section (e), Table 3: Water Column Parameters in Cape Cod Bay and Stellwagen NMS

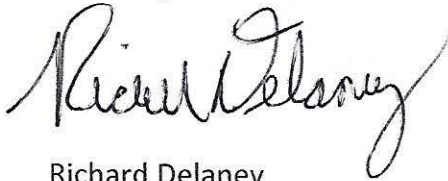
In the description for the Hydro profile under the “Depth” column, only downcast data are collected. Because we do not deploy our CTD with a rosette system, we do not collect water samples on the upcast so only downcast data are useful in the characterization of the water column. Also, under the “Parameter” column, Transmissometry data are not a part of the CCB/SBNMS monitoring plan and should be removed from this table.

We also recommend removing *Alexandrium cantenella* (row 3) from Table 3. In the current monitoring plan for CCB/SBNMS, *Alexandrium* is enumerated in the surface phytoplankton samples that are taken routinely during each survey. Testing via gene probe methods is not included but has been done on occasion when conditions warranted additional monitoring – twice in the 13 years we’ve been monitoring. Because *Alexandrium* has been observed so

infrequently, additional testing beyond the routine sample collection does not appear to be necessary.

CCS values the monitoring work we've been involved with under the guidance of MWRA. We also encourage and support modifications to the current permit that address the impacts of larger scale environmental concerns including climate change and contaminants of emerging concern. We appreciate your consideration of our proposed revisions. Should you wish to discuss anything further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard Delaney". The signature is written in a cursive style with a large, prominent initial "R".

Richard Delaney  
President and C.E.O.