



MASSACHUSETTS Rivers Alliance

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November 9, 2023

Michele Cobban Barden
Water Division
United States Environmental Protection Agency
Region 1
Boston, MA 02109

Dear Ms. Barden,

On behalf of the Massachusetts Rivers Alliance, thank you for the opportunity to comment on the National Pollution Discharge Elimination System (NPDES) Permit MA0103284 for the Massachusetts Water Resource Authority's (MWRA) Deer Island wastewater treatment plant.

The Massachusetts Rivers Alliance is a statewide organization with 85 member groups dedicated to protecting and restoring the rivers and streams of the Commonwealth. We are deeply concerned with the impacts of stormwater and sewage pollution on waterways around the state, including the Charles River, Mystic River, Alewife Brook, and Boston Harbor.

The MWRA has made significant progress in reducing the quantity of its untreated sewage discharge, helping to improve water quality, aquatic habitat and recreational opportunities in some of the state's rivers and Boston Harbor. Mass Rivers would like to see more work done by the MWRA and Co-Permittees to further reduce sewage pollution. Disappointingly, this Draft Permit does not propose nor promote abatement of the permittees' combined sewer overflows. As climate change brings more frequent and intense storms to Massachusetts, greater precipitation will mean greater sewage pollution. The Draft Permit accounts for climate resilience and mitigation in other ways, like preparing wastewater treatment facilities for flooding and major storms, but does not recognize the anticipated increase in CSOs, which exclusively discharge in environmental justice communities.

Our comments by section:

Section A1. We support the quarterly monitoring requirements for PFAS analytes in influent, effluent, and sludge.

Section C2. When the MWRA, and Co-permittees publish public notification of unauthorized discharges, that language should be translated into appropriate languages for the communities the entities serve, which may require translation to serve environmental justice communities. The notifications should also include universal symbols when possible to enhance public understanding.

Section E1.a In addition to the structural hazards a wastewater treatment facility must prepare for, we recommend including considerations of pumping ability during a major storm or flood event in the *WWTF Major Storm and Flood Events Plan*. Extreme precipitation elsewhere in the system could significantly increase influent to a level that proves difficult for the WWTF to pump, potentially causing backups that contribute to CSOs.

Section E1.a(1). In the list of measures permittees shall consider for mitigation in their *Major Storm and Flood Events Plan*, we recommend including green infrastructure projects. These projects allow rain or snowmelt to reenter the water cycle by soaking into the ground, rather than collecting on top of pavement and causing flood conditions. These projects, like constructed wetlands, permeable pavement, and bioswales, are often less expensive to construct and maintain than the already-included flood barriers, and can be constructed at any scale to meet the needs of the specific site.

Section G4. Considering the known toxicity of some of these industries, we recommend quarterly sampling, as annual sampling is not sufficient to protect ecological and public health.

Section E2.c.(2) As part of the MWRA's update to its I/I Reduction Plan, the MWRA should consider climate change and the projected increase and changes to precipitation patterns in order to have an accurate picture of future I/I challenges, and ensure that their planned reduction actions are commensurate with those precipitation levels. Also in this section, we support the enhanced public notification requirements for sanitary sewer overflow events as required in (2) iv.

Outfall Monitoring Advisory Science Panel (OMSAP). In the interest of ensuring science-based decision making at the MWRA, Mass Rivers strongly recommends that the OMSAP remain intact. The panel's expertise could prove helpful in interpreting and analyzing the new PFAS monitoring data that the Draft Permit proposes, as well as in advising the MWRA as the receiving waters and the aquatic life therein adapt to climate change.

Thank you for your consideration of these comments. We are available to further discuss our concerns and recommendations.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katharine' with a stylized flourish at the end.

Katharine Lange
Policy Director
Massachusetts Rivers Alliance
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