

RESPONSE TO PUBLIC COMMENTS FOR
DRAFT NPDES PERMIT MA0003379

AEROVOX INC.
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On July 27, 2000, the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MADEP) released for public notice and comment a draft National Pollutant Discharge Elimination System (NPDES) permit for the above draft NPDES permit. The public comment period for this draft permit expired on July 25, 2000.

The following comments are received from the permittee during the public comment period:

Comments No. 1

PCB Sampling Method : Aerovox requests that it continues to be allowed to analyze samples with either EPA Method 608 or allow to use EPA Method 1668 or 8082 due to high cost of the proposed Method 680.

Response :

EPA agrees with the permittee. The permittee is allowed to use EPA Method 608 or alternate EPA Method 1668 or other laboratory validated methods as long as proper laboratory control of QA/QC is followed as determined below.

EPA Method 608(40 CFR 136 Appendix A) shall be used for PCB analysis of storm water samples except as set forth in paragraph 2 below. The following sampling and analytical requirements must be satisfied:

1. Whole water samples(dissolved and undissolved phases) are collected and analyzed.
2. The Aroclor Pattern (chromatographic trace) found in the sample must be identical in peak retention times and peak ratios to the appropriate and matching Aroclor standard.
3. All Method 608 QC criteria are met for calibration, retention time windows, continuing calibration, surrogate recoveries and second column confirmation analysis.

If the concentration of the samples falls below the quantification level, or the sample chromatographic patterns do not match the appropriate standards, or the QC criteria are grossly exceeded, then the permittee shall, within 60 days of such occurrence, propose to EPA an alternate method with a lower detection limit. The low detection limit protocol must measure total PCBs either by summing all the individual congener concentrations or summing the

homologue group concentrations. Modified Method 1668 (WHO congeners plus homologue groups) or Method 1668 Revision A(total/full individual congener analysis) are acceptable. Other laboratory validated methods , total/full congener, or total homologue group methods that quantitate total PCBs below 0.1 µg/L either by High Resolution Gas Chromatography(HRGC) /ECD or HRGC/Low Resolution Mass Spectroscopy(LRMS) may be used as long as documented evidence is shown that all relevant QC criteria for the method are established and documented in an SOP. Upon receipt of EPA's approval of such alternate test method, the permittee shall commence using such method.

Footnote *4 of the permit is modified accordingly.

The following comments are received from The Coalition For Buzzards Bay :

Comment No. 1

CBB recommends that the permittee should monitor ambient water column concentrations of PCBs.

Response :

EPA agrees with you that ambient monitoring of PCBs will be helpful to evaluate further in-stream concentration, but does not believe it is appropriate to require it in the permit. Ambient monitoring will continue to be conducted by the Superfund Program through completion of the remediation effort.

Comment No. 2

The Coalition for Buzzards Bay requests to be placed on all mailing and public notice lists associated with this permit including release of monitoring and all other reports.

Response :

You are placed on all mailing of public notice lists for the draft permits. To obtain monitoring and other reports you have to request to EPA under the Freedom of Information Act (FOIA).