

RESPONSE TO PUBLIC COMMENTS

From October 22, 2001 to November 20, 2001, the United States Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MA DEP) solicited Public Comments on a draft NPDES permit, developed pursuant to an application from the Sandwich Public Schools, Sandwich, MA 02563 for the Henry T. Wing Elementary School, Sandwich, MA. After a review of the comments received, EPA has made the final decision to issue the permit authorizing the discharge. The following response to public comments describes the changes and briefly describes and responds to the comments on the draft permit. A copy of the final permit may be obtained by writing or calling Michele Cobban Barden, United States Environmental Protection Agency, 1 Congress Street, Suite 1100 (CPE), Boston, Massachusetts, 02114-2023; Telephone (617) 918-1539.

A) Comments submitted by John McFadden, Business Manager, Sandwich Public Schools on November 20, 2001.

Comment #1: The unbudgeted cost for the additional testing is estimated to be \$18,000 per year. Also, instrumentation needs to be purchased for chlorine residual testing at 5 times per week, which results in an additional cost that is unbudgeted as well.

Response: EPA acknowledges the expense of complying with the permit, however, the limitations and sampling requirements are justified due to the sensitivity of the receiving water and the nearly absent dilution.

Comment #2: The sampling requirement (24 hour composite) is an unreasonable requirement as the school building is used for only 8 hours per day for students on a school year basis. The after school used [sic] the building is marginal.

Response: The sampling requirement will be changed to 8-hour composite. However, sampling shall continue to be required year-round as the discharge is continuous, although it may be somewhat less in the summer months. Flows to the permitted outfall are from the Henry T. Wing School and the Sandwich Community School Early Learning Center, both of which are occupied year round.

B) Comments submitted by Paul Diodati, Director, Massachusetts Division of Marine Fisheries on November 16, 2001.

Comment #1: The Division finds that the control measures and monitoring requirements stipulated in the draft permit to meet the proposed effluent discharge limitations are adequate for the protection of fishery resources. The effluent discharge limitation for fecal coliform is consistent with the Division's effort to maintain the receiving water classification as SA, the highest marine water quality standard. The Division reserves the right to amend this finding should discharge conditions other than those stipulated in the draft permit take place, and the Division requests timely notification should this occur.

Response: Any substantial changes to the draft permit are subject to 40 CFR 122.62 and as such will be public noticed according to the procedures at 40 CFR 124.10.