

RESPONSE TO PUBLIC COMMENT

From May 18, 2002 to June 19, 2002, 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 Massachusetts Water Resource Authority for, the Wachusett Aqueduct Forebay and Open Channel. After a review of the comments received, EPA has made a final decision to issue the permit authorizing the discharge. The following response to comment 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 Betsy Davis, United States Environmental Protection Agency, 1 Congress Street, Suite 1100 (CMA), Boston, Massachusetts 02114-2023; Telephone (617) 918-1576.

A) Comment submitted by MWRA on June 18, 2002.

Comment #1: Page 1 of 6, receiving water name:
The receiving waters are Wachusett Aqueduct Forebay, Open Channel, & Sudbury Reservoir.” (The ‘&’ is misplaced and is currently confusing).

Response: The name of the receiving water will be changed in the permit to Wachusett Aqueduct Forebay, Open Channel, & Sudbury Reservoir.

Comment#2: Page 2 of 6, Part I:
A.1. “flows from the Wachusett Aqueduct Forebay to the Wachusett Aqueduct Open Channel and Sudbury Reservoir.
Under the “Flow”Parameter, MWRA will be monitoring the flow at the Wachusett Lower Gate House. The only flow meters for the Wachusett Aqueduct are located in

the

Lower Gatehouse.

Turbidity units are usually in “NTU” not “JTU”.

Copper: MWRA uses EPA Method 220.2 for analysis of CU in Wachusett samples. We have demonstrated an MDL of 1 ug/Ll by this method. During 2001 we collected 42 samples prior to the first application of copper to the reservoir and 31 were detectable by this method (mean = 1.4 ug/L, SD = 0.37, max = 2.5). However sample contamination issues are an important consideration at this level. MWRA request that replicate samples be collected at the head and terminal ends of the aqueduct during each sampling round. This will reduce the impact of sampling and analytical variability on the results.

Response: The second sentence on page 2 of 6, Part I.A.1 has been changed to clarify the direction of the flow.

The turbidity units have been changed.

To reduce the impacts of sampling, the location of the replicate samples for copper should be at the head of the aqueduct and the end of the aqueduct. EPA considers the end of the aqueduct to be the head of the Sudbury Reservoir.

Comment #3: Page 3 of 6, No. 6:
Wachusett is misspelled in sampling location 1).

Response: The spelling correction has been made in the final permit.

Comment #4: Page 3 of 6, Part I.A.I. (Continued):
Is it possible to add on the last phrase to this condition as written below:
b. "the pH of the effluent shall not be less than 6.5 or greater than 8.3 at any time,
unless
occurring
these values exceeded as a result of an approved treatment process or naturally
background condition.

Response: The additional language has been added.

Comment #5: Page 4 of 6, (a) Temperature:
The testing for WHCP-2 in the second paragraph is for mid September to mid October.

Could the fourth paragraph be edited to read:
Prior to WHCP-2 testing, daily monitoring will be conducted at different intakes levels
within the Sudbury Reservoir and Wachusett Reservoir to determine temperature
variations with depth. Testing shall begin only when the temperatures of the Wachusett
and Sudbury Reservoirs are within 5⁰ F of each other. Once testing has begun, daily
monitoring will be documented temperature variations.

Response: Paragraph four was edited to reflect that temperature testing will begin when the
Wachusett and Sudbury Reservoirs are within 5⁰ F of each other.

Comment #6: Page 5 of 6, D. Monitoring and Reporting 1. Reporting:
MWRA's existing NPDES permit for other portions of this project require monitoring
reporting on the 21st day of each month. MWRA requests that the Discharge
Monitoring
Report Forms be postmarked no later than the 21st day of the following month. This
change is necessary for our labs and to keep our presents reporting schedule consistent.

Response: The postmarked date for the Discharge Monitoring Reports has been changed in the
permit from the 15th to the 21st.