

**RESPONSE TO COMMENTS
REISSUANCE OF NPDES PERMIT NO. MA0101940
TOWN OF DEERFIELD, MASSACHUSETTS**

During the period, July 9, 2003, to August 7, 2003, EPA and the Massachusetts Department of Environmental Protection Agency solicited comments on the draft National Pollutant Discharge Elimination System (NPDES) permit to be issued to Town of Deerfield, Massachusetts, for the discharge of treated effluent from an Advanced Wastewater Treatment Plant to Deerfield River in the Town of Deerfield, Massachusetts. Comments were received from the following:

1. **State of Connecticut, Department of Environmental Protection(Betsy Wingfield, Interim Director, Planning and Standards Division, Bureau of Water Management) letter dated July 15, 2003**
2. **E-Mail from Mark Schleeweis, at Massachusetts Department of Environmental Protection dated July 15, 2003.**

Following is a response to comments received during the public comment period, including identification and explanation of those provisions of the draft permit which have changed in the final permit.

1. **State of Connecticut, Department of Environmental Protection(Betsy Wingfield, Interim Director, Planning and Standards Division, Bureau of Water Management) letter dated July 15, 2003**

COMMENT # 1

CT DEP notes that there is no requirement for monitoring of TKN and nitrite/nitrate in the permit, possibly because of small volume of discharge. While the operational data provided with the permit shows an average monthly flow of only 0.09 mgd, which would translate into a very small nitrogen load, the permit does allow up to 0.25 mgd on an average monthly basis. Should the plant increase its operation flow near the permit limit, a meaningful load of nitrogen, perhaps exceeding 30 lbs/day, may be contributed to the Connecticut River Basin.

Since Connecticut and New York had the TMDL for nitrogen loading to Long Island Sound approved by EPA in 2001, both states are implementing projects that will reduce total nitrogen loadings to Long Island Sound. The states and the Long Island Sound Study are committed to about a 60% reduction from Connecticut and New York by 2014. EPA has been working with Massachusetts, New Hampshire, and Vermont for over two years now in a Connecticut River work group coordinated by NEIWPC to develop a nitrogen reduction plan for those states by 2003 to compliment efforts in Connecticut and New York as recommended in the TMDL. Understanding the sources of nitrogen in states north of Connecticut is the key to developing a supportable management program. Institution of regular point source monitoring for nitrogen is an important first step. My recommendation would be to discuss sampling needs with EPA staff

involved in the Connecticut River work group or with the NEIWPCC staff involved in that effort. For a small plant like Old Deerfield, a practical approach may be to identify a threshold discharge volume (e.g., 0.2 mgd) that if exceeded on a monthly average basis for two consecutive months, would kick in a monthly nitrogen monitoring requirement.

RESPONSE # 1

EPA and MADEP agree with the above comment and have included a once/quarter monitoring requirement for total nitrogen in the final permit.

2. E-Mail from Mark Schleeweis, at Massachusetts Department of Environmental Protection dated July 15, 2003.

COMMENT # 1 Make the mailing address consistent at 8 Conway Street and Mark Gilmore is the chairman of the board of selectmen. The technical stuff is fine.

RESPONSE # 1

The commentator is correct regarding the name of the Chairman of the Board of Selectmen and the mailing address included in the fact sheet. Since the fact sheet is not part of the final permit decision, it will not be modified with these corrections, but they are noted, and are part of the administrative record for the permit. All comments relative to the Fact Sheet and the EPA response contained within this document shall become part of the administrative record.