RESPONSE TO PUBLIC COMMENTS
Templeton Wastewater Treatment Plant
NPDES No. MA0100340

On August2, 2005, the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (DEP) released for public notice and comment a draft National Pollutant Discharge Elimination System (NPDES) permit developed pursuant to an application from the Templeton Board of Sewer Commissioners for the reissuance of a permit to discharge treated municipal wastewater to the Otter River via Outfall 001. The public comment period for this draft permit expired on August31, 2005. Comments received were from the Town of Templeton, and the Riverways Program-Massachusetts Department of Fish and Game.

After a review of the comments received, EPA has made a final decision to issue the permit authorizing this discharge. The following response to comments describes the changes that have been made to the permit from the draft and briefly describes and responds to the comments on the draft permit. Clarifications which EPA considers necessary are also included below. The comment letters are part of the administrative record and they may be paraphrased herein. A copy of the final permit may be obtained by writing or by calling Doug Corb, EPA Massachusetts Municipal NPDES Permits Program (CMP), 1 Congress Street, Suite 1100, Boston, MA 02114-2023; telephone: (617) 918-1565.

The Town of Templeton

Comment 1

I believe the requirement for Fecal Coliform Bacteria testing to occur 3 times per week as stated in the draft NPDES permit to he excessive. Historically we have performed this test 2 times per week and this frequency has proven adequate. If there is not a compelling reason for performing this test 3 times per week. I would appreciate the test frequency being returned to 2 times per week.

Response1

EPA's intention in the final permit is for the frequency of monitoring for fecal coliform to remain as in the previous permit, at two per week. The increased frequency found in the draft permit is a typographical error. The frequency of monitoring for fecal coliform in the final permit shall be corrected to 2/week.

The Riverways Programs, MA Department of Fish and Game

Comment 2

The discharge monitoring data currently shows this facility has some issues meeting existing permit limitations and this may be due in part to the significant reduction in influent in relation to design capacity. The upgrade in the facility and reduction in treatment capacity will likely produce a positive impact to the Otter River and hopefully reverse some of the chronic noncompliance issues the facility is experiencing.

Of particular interest is the ammonia concentrations recorded in the effluent during the past few years. The DMR data shows the facility has had elevated ammonia levels; levels above the proposed limits at the 2.8 mgd and 0.6 mgd flow rate. The first six months of 2005 show the facility to be noncompliant each month for both daily max and monthly average. The facility would also fail to meet monthly average 4 out of 6 months and daily maximum 50% of the time with the 0.6 flow limitations. Given the concentrations measured in the effluent and the potential for toxicity posed by ammonia- especially to the efforts to re-establish a salmon population to the greater Connecticut River watershed, a more rigorous sampling schedule is desirable. The data presented in the Fact Sheet shows a great deal of variability and a monthly monitoring schedule may well be missing some of the higher concentrations discharged. The facility has also had some significant problems meeting chronic toxicity. Given the problems at the facility a ***weekly ammonia sampling schedule*** *will supply more information on ammonia levels and the potential role they may have in contributing to toxicity in the Otter River.*

Response 2

EPA anticipates that the plant upgrade will significantly improve the quality of the effluent. If the ammonia concentration remain high, the sampling frequency may be adjusted in the future by minor permit modifcation. The frequency of ammonia monitoring in the draft permit currently is weekly (1/week) and will remain so in the final permit.

Comment 3

The facility has displayed a consistent problem with meeting chronic toxicity goals. From January 2004 to April 2005 the facility only met limitations twice. Given this record it seems prudent to undertake a toxicity identification investigation especially if the toxicity issues continue after the plant upgrade.

Response 3

EPA's Office of Environmental Stewardship is aware of the history the facility has of chronic toxicity fond in the effluent. If a toxicity reduction evaluation is found to be necessary after the plant upgrade, EPA may pursue such an action.