RESPONSE TO COMMENTS FOR:
HUNTINGTON WASTEWATER TREATMENT PLANT, HUNTINGTON, MA
NPDES PERMIT #MA 0101265

On April 6, 2005, the U.S. Environmental Protection Agency ("EPA") and the Massachusetts Department of Environmental Protection ("MADEP") (together, the "Agencies") released for public notice and comment the draft for National Pollutant Discharge Elimination System ("NPDES") permit for the Town of Huntington Wastewater Treatment Plant. The permit authorizes the discharge from the wastewater treatment plant to the Westfield River.

The public comment period for the draft permit ended May 5, 2005.

Comments were received during the comment period from: 1. the Westfield River Watershed Association and 2. Massachusetts Division of Fisheries, Wildlife and Environmental Law Enforcement [MAFW&ELE]- Riverways Program

The comments and responses are given below.

A. Westfield River Watershed Association comments:

Comment A.1:

The draft permit calls for a Whole Effluent Toxicity testing schedule of only once per year and with only one kind of test organism. Currently the facility appears to be doing quarterly testing and in the second quarter of 2003, the facility failed its WET test, (there was also a failure two years prior to that failure- in 2001). The facility has not had two full years without failure so it is premature to reduce the toxicity testing of this facility. The facility should be required to test quarterly until it has two consecutive years of acceptable tests and than it can be allowed to petition for a reduction. The facility has not had problems with the test organism Pimephales so it seems okay to eliminate the testing requirement for this species and just test daphnia.

Response A.1:

EPA has reviewed the (toxicity testing) results and concluded that it was unclear what caused these failures. These could have been attributed to the toxicity of the effluent but, also it could have been due to the dilution water used and/or laboratory housekeeping practices, etc. EPA believes that one failure per year is not enough reason for small municipalities to be subject to quarterly toxicity requirements, especially since these discharges are greatly diluted in the receiving water. The Agencies believe that the individual permit parameters are sufficient to assure that Water Quality Standards of the receiving stream are being met.

Comment A.2:

Footnote #7 in the permit details the reporting required should there be a problem with the chlorination/dechlorination system. The procedure could be augmented by adding a requirement that the permittee address how to prevent future disruptions of this nature (if applicable to the situation).

Response A.2:

The following sentence will be in the final permit at the end of footnote # 7:

"Also, the permittee must address steps taken to prevent future malfunctions of the same nature."

Comment A.3:

In the draft permit, footnote #2 puts forward a requirement for the permittee to report the daily maximum and minimum flow rates but the'chart' (Part A.1) does not have the report requirement listed for daily maximum. This should be included.

Response A.3:

EPA will add this requirement to the final permit.

Comment A.4:

F*ootnote #5 calls for a 24 hour composite sample to consist of at least 24 grab samples over a 24 hour period. It would be best to have these samples be flow proportional, if applicable to this plant, because it would more accurately characterize the flows.*

Response A.4:

Part II [Section E.1] of the NPDES regulations defines a composite sample as proportional according to flow. However, for municipal plants like Huntington with small effluent flows, 24 hour (equal volume) composite sampling is acceptable to the Agencies due to the fact that there may be periods when flow is not passing through the treatment plant. In this situation, the permittee should make the composite appropriate for the time period when flow is actually leaving the facility.

B. MAFW&ELE- Riverways Program comments: [note: The Riverways Program comments and the Westfield River Watershed Association comments are found to be synonymous, therefore, in some instances the responses to the Riverways Program comments will be found in the responses to the comments by the Westfield River Watershed Association]

Comment B.1:

The draft permit package for the Huntington WWTP includes a map of Huntington and appears to show the location of the treatment facility near the confluence of the Westfield River and the West Branch. Mention of this map is made because there is conflicting information concerning the location of this facility. The EPA's permit compliance system (PCS) includes a latitude and longitude and map locator for this treatment plant that coincides with a Goss Hill Rd location, a spot above the confluence of the Westfield River and the Middle Branch and well upstream of the location shown on the Fact Sheet's map. The location of the discharge is crucial in the dilution calculation which in turns affects certain permit limitations. A discharge above both the Middle and West Branches of the Westfield River would result in a 7Q10 estimate markedly lower than one for a location below these tributaries. Where is the actual plant discharge location?

Response B.1:

The MA DEP Division of Watershed Management reviewed the Huntington 7Q10 values.
The discharge from the Huntington facility is actually via a diffuser located midstream in the West Branch
Westfield River (WBWR) channel, 45 feet upstream of the confluence with the Westfield River (WR). Since the drainage area of the WBWR is approximately 96 square miles and the drainage area of the main Stem WR just up stream of its confluence with the WBWR is approximately 224 square miles. Due to the location of the diffuser, the two drainage areas were used to calculate the 7Q10 at the Huntington facility. Therefore, the new Huntington 7Q10 flow value, based on approximately 320 square miles of drainage area, was recalculated to be 30.3 cubic feet per second [cfs].

The State recalculated the drainage area and the 7Q10 flow estimate using the low flow estimate watershed tools developed by USGS Streamstats program supported in MassGIS. Please see Figure 1 attached to these comments.

Comment B.2:

The draft permit calls for a Whole Effluent Toxicity testing schedule of once per year using only one species of test organism. Currently the facility appears to be doing quarterly testing, (this conjecture is based on the discharge monitoring data available). This data also shows the facility failed to meet its permit limitation in the second quarter of 2003 and once in 2001. Given the recent 2003 failure it is premature to reduce the toxicity testing of this facility as EPA often requires facilities to have two or more
years of acceptable WET testing results before entertaining a request for a reduction in testing requirements. We advocate the quarterly schedule remain until the facility has at least two consecutive years of WET compliance. At that time the permittee would be able to petition for a reduction in testing frequency. The facility has had acceptable WET testing results for the organism P. Pimephales and the elimination of testing requirements using this less sensitive species is valid.

Response B.2:

See Response A.1 above.

Comment B.3:

Footnote #7 in the permit details the reporting required should there be a problem with the chlorination/dechlorination system. The procedure could be augmented by adding a requirement that the permittee address how to prevent future, similar disruptions (if applicable to the situation). We would like to offer this suggested addition for consideration.

Response B.3:

See response A.2 above.