

## **Response to Comments on Draft National Pollutant Discharge Elimination System (NPDES) Permit No. MA0026247 – New England Detroit Diesel – Allison, Inc.**

### **Introduction:**

In accordance with the provisions of 40 C.F.R. §124.17, this document presents EPA's responses to comments received on the Draft NPDES Permit (MA0026247). The responses to comments explain and support the EPA determinations that form the basis of the Final Permit. The New England Detroit Diesel – Allison, Incorporated (NEDDA) draft permit public comment period began August 23, 2006 and ended September 21, 2006. Comments were received from the permittee on the draft permit.

The Final Permit is identical to the Draft Permit that was available for public comment. Although EPA's knowledge of the facility has benefited from the various comments and additional information submitted, the information and arguments presented did not raise any substantial new questions concerning the permit. EPA did, however, make certain clarifications in response to comments.

### **Comments 1-5 from NEDDA:**

**Comment 1: Fact Sheet – page 5 of 16** – In Paragraph 4 of Section B. Description of the Facility you list that the current operation of the dynamometers is as follow: 2-4 hours once per quarter for the engine dynamometer and 30 to 60 minutes twice per month for the chassis dynamometer. In reviewing this operation schedule with Mr. Jeffrey Manning and Mr. Bob Cannon (both of NEDDA), the current operating frequency for this equipment is once per year for the engine dynamometer and once per month for the chassis dynamometer; duration of the operation is correct.

**Response to Comment 1:** The information in Section B. Description of the Facility of the Fact Sheet was based on a site visit conducted by EPA staff. The Fact Sheet (dated August 15, 2006) was finalized and issued with the public notice draft permit. Since the Fact Sheet is not part of the final permit decision, it will not be modified.

**Comment 2: Part I.A.1. Outfall Serial Number 001A** – NEDDA proposes to work with Norfolk to use empirical estimations for stormwater flow rate in GPD. NEDDA will calculate stormwater runoff based on the volume of the rain event (as determined by available National Oceanic and Atmospheric Association (NOAA) data following the event) and the available impermeable area (roof and pavement). NEDDA proposes this method for estimation of stormwater flow rate to satisfy the requirement of this permit.

**Response to Comment 2:** The draft permit states that average monthly and daily maximum flow rate through Outfall 001A shall be monitored by estimation. EPA does not specify the method by which NEDDA must estimate the flow rate; therefore, NEDDA shall satisfy this permit requirement by using an estimation method adequate

to accurately estimate the flow rate. No changes to the draft permit are necessary to allow NEDDA to use the estimation method described in Comment 2, above.

**Comment 3: Part I.A.2. Outfall Serial Number 001B** – Based on the above correction to operating frequency, NEDDA requests that the sampling frequency of the engine dynamometer be reduced to annually as this piece of equipment is only operated annually. Also, footnote No.2 asks that if practicable NEDDA sample the discharge from this process after 48 consecutive hours with no rain. This machine is run infrequently and as required by customers of NEDDA. NEDDA does not have the control of customer requirements to wait to run this machine until 48 consecutive hours with no rain. NEDDA would like to inform the EPA prior to final issuance of the permit that it will not always be possible to wait for dry weather to operate this equipment. In addition, NEDDA understands that the requirement for analyzing for samples for Total Residual Chlorine (TRC) is based on the use of city water for non-contact cooling water, but NEDDA asks that the requirement to sample for TRC be removed from the sampling. NEDDA utilizes only city water as non-contact cooling water. In past years, the city’s water supply as received by NEDDA was found to be in exceedence of TRC limits set for receiving waters. NEDDA has no control over the TRC in the city’s water supply.

**Response to Comment 3:** The sampling frequency for Outfall 001B for flow rate, temperature, TRC, O&G, and pH of quarterly is defined in footnote 4 as “the sampling of one (1) discharge event in each quarter, when discharge occurs.” Therefore, if the engine dynamometer is not operated during a specific quarter, then sampling of the above specified parameters is not required. If in fact the engine dynamometer is only operated annually, the sampling for the above specified parameters will only occur annually. Sampling frequency of the draft permit for Outfall 001B will remain unchanged in the final permit.

EPA understands that NEDDA may not be able to always sample during dry weather. This is the reason that footnote 2 states “If practicable, grab samples shall be taken after 48 consecutive hours without rain to minimize the storm water component of the sample.”

EPA must take this opportunity to clarify that the water from NEDDA’s operations is not classified as “non-contact cooling water,” as was stated several times in the comments received from NEDDA. Since the purpose of the water is not to cool, but to move the stainless steel veins (similar to blades) within the enclosed chamber of the dynamometers, the water shall be classified as “process water.”

The requirement to sample for TRC is based on the use of city water as process water in the dynamometers. Although NEDDA does not have control over the TRC in the city’s water supply, NEDDA does have control over the amount of TRC that is discharged from their facility to the surface water. The requirements for TRC in the draft permit shall remain unchanged in the final permit in order to monitor the amount of chlorine in the discharge water from NEDDA.

**Comment 4: Part I.A.3. Outfall Serial Number 001C** – Based on the above correction to operating frequency, NEDDA requests that the sampling frequency of the chassis dynamometer be increased to semi-annually. Also, footnote No. 2 asks that if practicable NEDDA sample the discharge from this process after 48 consecutive hours with no rain. This machine is run infrequently and as required by customers of NEDDA. NEDDA does not have the control of customer requirements to wait to run this machine until 48 consecutive hours with no rain. NEDDA would like to inform the EPA prior to final issuance of the permit that it will not always be possible to wait for dry weather to operate this equipment. In addition, NEDDA understands that the requirement for analyzing samples for Total Residual Chlorine (TRC) is based on the use of city water for non-contact cooling water, but NEDDA asks that the requirement to sample for TRC be removed from the sampling. NEDDA utilizes only city water as non-contact cooling water. In past years, the city’s water supply as received by NEDDA was found to be in exceedence of TRC limits set for receiving waters. NEDDA has no control over the TRC in the city’s water supply.

**Response to Comment 4:** The sampling frequency for Outfall 001C for flow rate, temperature, TRC, O&G, and pH of annually in the draft permit is based on Part IV.E.3. of the Fact Sheet:

Monitoring frequency for the chassis dynamometer is less frequent than that established for the engine dynamometer, as the engine dynamometer is consistently run at a higher horsepower (HP) rating than the chassis dynamometer. Thus, the water discharge from the engine dynamometer is expected to discharge at a higher temperature. Therefore, the engine dynamometer serves as a representative sample of the dynamometer discharges with sampling of the chassis dynamometer required annually to ensure compliance with water quality standards.

Therefore, the sampling frequency for Outfall 001C of annually will remain unchanged in the final permit.

EPA understands that NEDDA may not be able to always sample during dry weather. This is the reason that footnote 2 states “If practicable, grab samples shall be taken after 48 consecutive hours without rain to minimize the storm water component of the sample.”

The requirement to sample for TRC is based on the use of city water as process water in the dynamometers. Although NEDDA does not have control over the TRC in the city’s water supply, NEDDA does have control over the amount of TRC that is discharged from their facility to the surface water. The requirements for TRC in the draft permit shall remain unchanged in the final permit in order to monitor the amount of chlorine in the discharge water from NEDDA.

**Comment 5: Part I.A.9.** – NEDDA acknowledges the restriction placed on discharge from the dynamometers if run simultaneously, but based on how the machines

operate, cooling water is required at a specific flow rate based on the operating horsepower of the equipment. The equipment will not operate properly with less cooling water and/or the tests would not be valid if operated at a lower horsepower than required. In addition, the possibility of the equipment running simultaneously is low; however, if both were required to operate based on customer requirements, this permit would prevent a necessary event. NEDDA requests that this requirement be removed from the permit or be qualified by “If practicable” as was used earlier for the sample collection requirement from the discharge from each dynamometer.

**Response to Comment 5:** Part I.A.9. of the draft permit does not restrict the discharge from the dynamometers, it simply requires monitoring in the event that the engine and chassis dynamometer are run simultaneously. This requirement to monitor should not hinder the operation of the dynamometers. Therefore, no change shall be made to the final permit.