

Massachusetts Port Authority (Massport) Response to Comments on Draft National Pollutant Discharge Elimination System (NPDES) Permit No. MA0032751 - Logan International Airport Fire Training Facility

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 (MA0032751). The responses to comments explain and support the EPA determinations that form the basis of the Final Permit. The Logan International Airport Fire Training Facility draft permit public comment period began July 28, 2006 and ended August 26, 2006. Comments were received from the permittee on the draft permit.

The Final Permit is substantially identical to the Draft Permit that was available for public comment. Although EPA's decision-making process 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, improve certain analyses and make certain clarifications in response to comments. These improvements and changes are detailed in this document and reflected in the Final Permit. A summary of the changes made in the Final Permit are listed below. The analyses underlying these changes are explained in the responses to individual comments that follow.

1. Composite samples shall be collected based on one sample per hour over the course of discharge, with a minimum of two samples required.
2. Whole Effluent Toxicity (WET) testing shall be required only during years with discharges and shall be sampled during this discharge.
3. The wording of the permit now explicitly states that adjustment of pH in order to meet effluent limits is allowed, prior to carbon treatment.

Comments 1-4 from Massport:

Comment 1:

Composite Sampling: Footnote 6 requires that composite samples consist of at least eight grab samples collected over a normal eight hour work day. The FTF treatment system is normally operated for less than a full day. Massport requests that composite samples be collected based on one sample per hour over the course any length treatment period with a minimum of two samples required.

Response to Comment 1:

EPA agrees that composite samples shall be collected based on one sample per hour over the course of discharge, with a minimum of two samples required. Footnote 6 has been modified as follows:

“A composite sample is a sample consisting of grab samples collected at hourly intervals (two minimum) during a normal discharge.”

However, EPA noticed that footnote 1 requires that all samples shall be collected prior to discharge from the above ground holding tank. This footnote should not be applied to WET Testing, which shall be sampled during discharge, and therefore has been modified as follows:

“All samples, except for WET Testing, shall be collected after treatment and prior to discharge from above ground holding tank.”

Comment 2:

WET Testing: Massport periodically discharges from the FTF. Normally, water is reused as makeup water on-site after treatment. Some years, there are no discharges. Massport requests that Whole Effluent Toxicity testing be required only during years with discharges.

Response to Comment 2:

The Draft Permit has been changed to indicate that the permittee shall conduct one WET Test per year, during years with discharges. The following footnote 8 has been added to the Permit:

“Sampling frequency of 1/Year is defined as the sampling of one (1) discharge event in each calendar year, when discharge occurs. A year is defined as the interval of time between the months of: January through December, inclusive.”

Comment 3:

pH Adjustment: Stored water waiting for treatment has periodically experienced a drop in pH. Massport requests that a provision be added to the permit to allow for addition of a caustic (e.g. lime) or pH buffer to allow for pH adjustment prior to carbon treatment.

Response to Comment 3:

The wording of the Draft Permit has been changed to now explicitly state that pH adjustment is allowed prior to carbon treatment. Part I.A.3. of the Permit now reads:

“The pH of the effluent shall not be less than 6.5 or greater than 8.5 at any time unless these values are exceeded as a result of natural causes or as a result of the approved treatment processes. The pH of the water may be adjusted to meet this effluent limit, prior to carbon treatment.”

Comment 4:

DMR Submission Date: Under the draft permit, DMR submission is required by the 15th of the month. The normal laboratory turnaround time for any collected water samples is 14 days (2 weeks). Samples collected at the end of the month would need to be “rush” analyzed by the laboratory at additional cost to Massport in order to allow time for DMR review and submission to EPA by the 15th. Massport requests that the deadline for submission of the DMR be the 21st of the month in order not to have to “rush” the lab analyses.

Response to Comment 4:

Submission of DMRs on the 15th of the month is a standard requirement for NPDES Permits. Massport has succeeded in operating the FTF in such a manner that they have only discharged twice over the past 5 years. Given the infrequent and planned nature of discharge, EPA does not see it as unreasonable to plan activities to avoid discharging at the end of the month, thus avoiding “rush” analysis by the laboratory. The DMR submission date in the Draft Permit remains unchanged in the Permit as the 15th day of the month.