

RESPONSE TO COMMENTS

NPDES PERMIT No. MA0101079 Sunderland Wastewater Treatment Plant

On March 29, 2006, the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) released for public notice and comment a draft National Pollutant Discharge Elimination System (NPDES) permit for the Sunderland Wastewater Treatment Plant in Sunderland, Massachusetts. The draft permit was developed pursuant to an application from the Town of Sunderland for the reissuance of its permit to discharge wastewater to the designated receiving water, the Connecticut River. The public comment period for this draft permit expired on April 27, 2006. Comments were received from Ms. Andrea F. Donlon of the Connecticut River Watershed Council in a letter dated April 27, 2006.

After a review of the comments received, EPA has made a final decision to issue the permit authorizing this discharge. The following are the comments and EPA's response to those comments, including changes that have been made to the final permit from the draft as a result of the comments. The comment letters are part of the administrative record and are paraphrased herein. A copy of the final permit may be obtained by writing or by calling Mark Malone, EPA Municipal Permits Branch (CMP), 1 Congress Street, Suite 1100, Boston, MA 02114-2023; telephone: (617) 918-1619.

Comments received from Ms. Andrea F. Donlon of the Connecticut River Watershed Council.

Comment 1

The location of the outfall is in an area that is popular for secondary contact recreation and is close to primary contact recreation areas. The Sunderland draft permit has twice per month sampling for fecal coliform. Both the Hadley and Hatfield WWTPs which are just downstream and similar in capacity, roughly 0.5 mgd, have weekly sampling frequency for bacteria in their permits. The Connecticut River Watershed Council recommends that the Sunderland WWTP permit also require weekly bacteria sampling.

Response 1

We agree and the final permit includes weekly sampling for fecal coliform.

Comment 2

The average monthly total residual chlorine limit has changed from 1.0 mg/l in the current permit to "Report" in the draft permit. The daily maximum limit is 1 mg/l, so the average monthly is not likely to ever exceed 1.0 mg/l, but the justification for this change is not explained in the Fact Sheet.

Response 2

If the maximum daily permit limit of 1.0 mg/l is met, then the average of all the samples for the month can never be greater than 1.0 mg/l. Consequently, the need for an average monthly limit of 1.0 mg/l is unnecessary. The final permit requires the permittee to report the average monthly total residual chlorine as in the draft permit.

Comment 3

It would be preferable that the informal Endangered Species Act consultation with other governmental agencies had taken place prior to the issuance of the draft permit and what the results of the consultation were.

Response 3

While every effort is made to complete the informal consultation prior to the issuance of the draft permit, this is not always possible. If available, the results of the consultation will be discussed in the Fact Sheet issued with the draft permit. If the consultation would result in changes to the draft permit after its issuance, it will be discussed in the Response to Comments and reflected in the final permit. Subsequent to the issuance of the draft permit, the National Marine Fisheries Service has concurred with EPA's determination that the proposed reissuance of the NPDES permit is not likely to adversely affect the shortnose sturgeon and that no further consultation is required.

Comment 4

We recommend that facilities on the Connecticut River be required to sample effluent total phosphorus and ortho-phosphorus between November and March.

Response 4

Because the relatively small discharge has a dilution factor of 2,196, the phosphorus contribution of the Sunderland facility is insignificant. Consequently, a phosphorus monitoring requirement is not included at this time.