RESPONSE TO PUBLIC COMMENTS
NPDES PERMIT MA0101737
Town of Marshfield
Marshfield, MA

On August 21, 2006, the U.S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection (MassDEP) released for public notice and comment a draft National Pollutant Discharge Elimination System (NPDES) permit pursuant to an application from the Town of Marshfield, Massachusetts for the reissuance of its permit to discharge treated wastewater to the Massachusetts Bay. The public comment period for this draft permit expired on September 19, 2006.

Comments were submitted by the following organizations:

1. The Massachusetts Division of Marine Fisheries
2. The Massachusetts Department of Fish and Game- Riverways Program
3. The Town of Marshfield

After review of the comments received, EPA has made a final decision to issue the permit authorizing the discharge. The following are the comments and EPA's response to those 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 calling Suprokash Sarker, EPA NPDES Permits Program [CMP], 1 Congress Street, Suite 1100, Boston, MA 02114-2023; telephone: [617] 918-1693.

A. The following comments were received from the Massachusetts Division of Marine Fisheries:

Comment A.1.

"Marine Fisheries recommends that the maximum daily discharge limitation for fecal coliform of 43 cfu/100 ml be changed to 28 cfu/100 ml in order to be consistent with standards established by the National Shellfish Sanitation Program."

Response

EPA and MassDEP agree. The requirement is a condition of the state Section 401 Water quality certification. The permit has been changed accordingly.

B. The following comments were received by the Massachusetts Department of Fish and Game – Riverways Program:

Comment B.1.

"The lower bacteria limits are a welcome addition to the draft permit. Given the Class SA status of the receiving water and the shellfish resource in these waters, bacteria levels are

a key component of protection for the Bay. We support the addition of *Enterococcus* monitoring for this facility and the additional bacteria data it will provide. We would like to suggest the permit require the Fecal Coliform bacteria and the *Enterococcus* be sampled simultaneously. Having matched data will help in determining correlations and relationships between the two bacteria types."

Response

We have noted your comments. We agree that fecal coliform and enterococcus sampling should be done concurrently and have changed the permit accordingly.

Comment B.2

"The draft permit calls for a reduction in whole effluent toxicity testing frequency to twice per year. The sampling will be done in July and October. Were these months selected based on the presence of sensitive species or life stages or other reasons?"

Response

WET sampling months were selected based on the MassDEP Watershed permit schedule.

Comment B.3

"The Fact Sheet notes this facility accepts oil and grease wastes from restaurants. Has the effluent been tested for oil and grease concentrations to ascertain the efficiency of the oil and grease pretreatment process? If there should be a malfunction in the grease pretreatment, can grease enter the waste stream? If testing has not occurred and there is a reasonable potential for oil and grease to be present in the effluent above 15 mg/l than we would advocate for an oil and grease testing and reporting requirement."

Response

The grease received is delivered to the WWTF by septic trucks and comes from grease traps at restaurants. The Town has an existing policy that requires all restaurants, whether on septic or sewer, to have an external grease trap. The Town, as well as the Massachusetts State Environmental Code- Title 5 [310 CMR 15.351(2)], also requires that these traps be maintained at regular intervals and records retained by the establishment for inspection and reporting.

Once the receiving tanks at the treatment plant are full, the material is pumped into a dissolved air flotation (DAF) thickener, with a dose of polymer, where the coagulated grease is floated and skimmed from the surface of the vessel. There are two components after processing with the "DAF", concentrated grease and subnatant "liquid". The grease product is sent to an isolated "concentrated grease tank" and from there is mixed with sludge that is being shipped off-site. The subnatant liquid discharged from the process is fed into a septic receiving tank, which is then fed into the WWTF ahead of the grit

chamber. This flow, therefore, goes through the entire WWTF treatment process including skimming in the clarifiers and at the contact chambers.

Because we believe that the treatment facilities ensure the effective removal of oil and grease, we have not included monitoring for oil and grease in the final permit.

C. The following comments are received from the Town of Marshfield :

Comment C.1

"The physical address of the WWTF is now 200 Joseph Driebeek Way. The draft permit states "Driebeck Road". "

Response

We have noted your comment and change the address in the final permit.

Comment C.2

"Page 2 of the draft permit indicates a reduction in effluent fecal coliform limits from 200/400 to 14/43. Though the Marshfield WWTF repeatedly and consistently meets its effluent limits for this parameter, we feel that this >90% reduction in discharge limits is unreasonable. The MWWTF discharges through an ocean outfall with a significant dilution factor and at the limits of the current permit represents less of a fecal coliform indicator loading to the local waters than that created by the local avian and other wildlife present. The Town asks for re-evaluation of this substantial reduction in discharge limits and return to the limitations of the current NPDES Permit."

Response

Fecal coliform limits of 14 cfu/100ml monthly average and 43 cfu/100ml maximum daily were established based on MaasDEP regulation on surface water quality standards for class SA water, open shell-fishing. See 314 CMR4.05(4)(a)(4). In addition, the maximum daily requirement was further reduced from 43 cfu/100ml to 28 cfu/100ml based on comments from the Massachusetts Division of Marine Fisheries. See comment and response under A.1.

Comment C.3

"Page 2 of the draft indicates an effluent pH limitation of 6.5-8.5 and Page 4 Part I.A.1. of the draft permit indicates that "excursions aren't allowed unless these values are exceeded as a result of an approved treatment process" The current permit Part I.A.b. states"unless these values are exceeded due to natural causes or as a result of the approved treatment process". The Town is requesting a reduction in allowable discharge limit from 6.5 to 6.0. The WWTF occasionally experiences pH values less than 6.5 as a result of the approved treatment process. Although this is allowable in the contract language, the Town is requesting this modification to avoid effluent limit violation recordings for these allowable

excursions. The Town also requests that the clause for "natural causes" remain in the new permit."

Response

The pH lower limit has been changed to 6.0 standard units. This pH level is acceptable and will result in the achievement of water quality standards outside the initial mixing zone due to the large dilution available at the point of discharge and the buffering capacity of ocean water. The clause for "natural causes" is included in the final permit.

Comment C.4

"Section C3 of the draft permit states a requirement for the Town to develop and implement a plan to control infiltration and inflow (I/I) and submit it to EPA and MassDEP within six months of the effective date of this permit. This was a requirement of the current permit which the Town fulfilled at that time. The Town requests that the language be modified due to the fact that this was performed during that last (current) permit issuance."

Response

We agree that the Town has prepared an I/I control plan in accordance with the requirements of the previous permit. We believe that the plan should be updated to incorporate new projects or initiatives which will be taken during the term of the reissued permit. The first paragraph under Section C3 has been changed as follows:

"The permittee's infiltration and inflow (I/I) control plan shall be updated to reflect current conditions and submitted to EPA and MassDEP **within six months of the effective date of this permit** (see page 1 of this permit for the effective date). The plan shall describe the permittee's program for preventing infiltration/inflow related effluent limit violations, and all unauthorized discharges of wastewater, including overflows and by-passes due to excessive infiltration/inflow."