

## **Response to Comments on Draft National Pollutant Discharge Elimination System (NPDES) Permit No. MA0005517 – Braintree Electric Light Department – Potter Station – Braintree, MA.**

### **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 for Braintree Electric Light Department (BELD) – Potter Station (MA0005517). The responses to comments explain and support the EPA determinations that form the basis of the final permit. The BELD draft permit public comment period began August 25, 2008 and ended September 23, 2008. Comments were received on the draft permit from BELD.

The final permit is substantially identical to the draft permit that was available for public comment. Although EPA's knowledge of the facility has benefited from the 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. 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 comments that follow.

### **Changes in Final Permit:**

1. The requirement to monitor for chlorine, with a limit, has been removed from the table in Part I.A.1 of the permit.
2. A requirement to monitor for total residual oxidant (TRO), with a limit of 0.1 mg/L, has been added to the table in Part I.A.1 of the permit.
3. Part I.A.6 of the final permit (Part I.A.7 of the draft permit) has been revised to state, "Chlorine and Stabrom 909 Biocide may be used as biocides. No other biocide shall be used without explicit approval from the EPA and the MassDEP."
4. In Part I.B.3 of the permit, the reference to the current MSGP issued on October 30, 2000 has been revised to the current MSGP issued on September 29, 2008.
5. The first page of the permit has been clarified to state "effluent limitations and monitoring requirements" instead of "effluent limitations, monitoring requirements," "Stephen S Perkins" has been replaced with "Stephen S. Perkins," and "General Conditions" has been replaced with "Standard Conditions."
6. The following footnote has been added in Part I.A.1, footnote 6, and Part I.A.2, footnote 6: "Composite samples shall consist of a minimum of eight (8) grab samples of equal volume collected at hourly intervals during a 24-hour period and combined proportional to flow."

7. Part I.A.4 has been removed from the final permit since similar language was already included in Part I.A.8.

#### **SUMMARY OF COMMENTS FROM BELD:**

The fact sheet states that the, “the draft permit requires that the only biocide approved for use is chlorine (normally added as sodium hypochlorite). No other biocide can be used.”

Braintree Electric Light Department request clarification on the use of Stabrom 909 Biocide (background information attached) as an approved chlorine based biocide.

In short; we are requesting that the wording in Section C be changed to “any chlorine based biocide.”

#### **RESPONSE TO COMMENTS:**

Part I.A.7 of the draft permit specifically states, “Chlorine may be used as a biocide. No other biocide shall be used without explicit approval from the EPA and the MassDEP.”

EPA has reviewed the MSDS of Stabrom 909 Biocide, a stabilized bromine biocide, and determined that BELD may use the requested biocide; however, the testing requirements in Part I.A.1 must change in order to effectively monitor the effects of this biocide on the receiving water.

Therefore, the final permit requires testing for total residual oxidants (TRO) in place of total residual chlorine (TRC). Part I.A.1 of the final permit now requires monitoring for TRO, with a limit of 0.1 mg/L. Monitoring for TRC has been removed from Part I.A.1 of the final permit. Monitoring for TRO in the final permit will ensure that the impacts of both bromine-based and chlorine-based biocides are measured in the discharge.

Since the Fact Sheet is a final document and cannot be changed, this response to comments serves to document the change to allow use of the Stabrom 909 Biocide.

#### **CLARIFICATIONS:**

Due to issuance of a new MSGP on September 29, 2008, the references to the previous MSGP-2000 have been replaced with references to the new MSGP-2008. Part I.A.2, footnote 5, which refers to Sector O of the MSGP (Steam Electric Generating Facilities) and the benchmark monitoring condition of 1.0 mg/L total recoverable iron is equivalent to the content and reference in the MSGP-2008. Therefore, no change to the permit is necessary in this case. In Part I.B.3, Storm Water Pollution Prevention Plan (SWPPP), the reference to the MGSP-2000, issued on October 20, 2000, as the current permit has been replaced with a reference to the MSGP-2008, issued on September 29, 2008, as the current permit. The SWPPP requirements of the MSGP-2008 are consistent with those in the MSGP-2000.

Typographical errors in the permit have also been fixed. The first page of the permit has been clarified to state “effluent limitations and monitoring requirements” instead of “effluent limitations, monitoring requirements,” “Stephen S Perkins” has been replaced with “Stephen S. Perkins,” and “General Conditions” has been replaced with “Standard Conditions.”

Additionally, a footnote defining composite samples has been added at Part I.A.1, footnote 6, and Part I.A.2, footnote 6, as follows: “Composite samples shall consist of a minimum of eight (8) grab samples of equal volume collected at hourly intervals during a 24-hour period and combined proportional to flow.”

Finally, Part I.A.4 of the draft permit, which states “Pollutants which are not limited by this permit, but which have been specifically disclosed in the application, may be discharged provided that such discharge does not violate Section 307 and 311 of the Clean Water Act or applicable water quality standards,” has been removed from the final permit since the following similar language was already included in Part I.A.8, “The discharges shall not jeopardize any Class SB use of the Weymouth Fore River and shall not violate applicable water quality standards. Pollutants which are not limited by this permit, but which have been specifically disclosed in the permit application, may be discharged at the frequency and level disclosed in the application, provided that such discharge does not violate Section 307 or 311 of the Clean Water Act (CWA) or applicable state water quality standards.”