UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND
ONE CONGRESS STREET
BOSTON, MA 02114-2023

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMIT MODIFICATION TO DISCHARGE TO THE WATERS OF THE UNITED STATES

NPDES PERMIT No.: MA0028801

NAME AND ADDRESS OF PERMITTEE:

Alden Research Laboratory, Inc.
30 Shrewsbury Street
Holden, Massachusetts 01520

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Alden Research Laboratory, Inc.
30 Shrewsbury Street
Holden, Massachusetts 01520

RECEIVING WATER: Chaffins Brook, Nashua River Watershed (MA81)

CLASSIFICATION: A

DATE OF PUBLIC NOTICE:

TABLE OF CONTENTS:

I. PROPOSED ACTION, TYPE OF FACILITY, DISCHARGE LOCATION AND RECEIVING WATER DESCRIPTION:

On July 11, 2007, Alden Research Laboratory, Inc. (Alden) proposed to discharge effluent from fish testing facilities to proposed outfalls 003 and 004 by modifying the existing National Pollutant Discharge Elimination System (NPDES) permit (Permit No. MA0028801), which became effective on July 17, 2006. The facility is engaged in laboratory-scale hydraulic flow modeling for various industries, and evaluates fish passage and protection technologies with live fish. The fish testing facility tanks operate on a closed loop system with water discharged intermittently for facility modification and maintenance. Source water is the Town of Holden municipal water. The receiving water is Chaffins Brook, a tributary of the Wachusett Reservoir.

Discharge Location

The testing facility in Building 6 has a maximum discharge of 54,000 gallons to outfall 003. The testing facility in Building 15 has a maximum discharge of 450,000 gallons to outfall 004. Discharge to each outfall would be scheduled to operate on different days and would not exceed the average monthly limit of 100,000 gallons per day (gpd) included in the current permit.

The effluent from the fish testing operation will be filtered prior to discharge. The closed loop system includes both particulate filtration with high capacity bag filters (maximum filtration of 25 microns) and ultraviolet (UV) light for sterilization. Discharge from outfalls 003 and 004 will occur periodically throughout the testing period from April to December. The permittee has proposed to drain and fill the test tanks up to 5 times per year, and discharges will not exceed 29 days per year.

A map of the facility, including existing and proposed discharge locations, is shown in Attachment A; a line drawing of the fish testing and holding facilities for each outfall is shown in Attachment B.

Receiving Water Description

Chaffins Brook, a tributary to Wachusett Reservoir located in Holden, MA, is designated as a Class A water body by the Massachusetts Surface Water Quality Standards (314 CMR 4.05). Class A waters include waters designated as a source of public water supply and their tributaries, as well as habitat for fish and other aquatic life, including their reproduction, migration, growth, and other critical functions, and primary and secondary contact recreation, even if not allowed.

Alden is the only authorized discharge, and no withdrawals occur on this reach. According to Massachusetts Department of Environmental Protection's (MassDEP) 1998 Water Quality Assessment, Chaffins Brook supports primary and secondary contact uses. Aquatic life use is only partially supported because benthic macroinvertebrates are slightly impaired compared to the East Wachusett Brook reference station. Chaffins Brook is included on MassDEP's Final Year 2006 303(d) Integrated List of Waters as a Category 5 Water, that is, a waterbody requiring development of a total maximum daily load (TMDL). The cause of the impairment is unknown.

II. BASIS FOR MODIFICATION

On July 11, 2007 and pursuant to Part I, Section C of the its existing permit, Alden provided the United States Environmental Protection Agency (EPA) with notification of their intention to discharge filtered water associated with fish testing facilities from new outfalls 003 and 004.

As part of the modification procedure, EPA and MassDEP are now taking public comment on the proposed modification. In Massachusetts, EPA operates the NPDES permitting program. EPA and MassDEP issue joint permits that satisfy the requirements of federal and state law.

III. LIMITATIONS AND CONDITIONS

Effluent limitations and all other requirements described herein may be found in the draft permit modification.

Statutory and Regulatory Authority

The CWA prohibits the discharge of pollutants to waters of the United States without a NPDES permit unless such a discharge is otherwise authorized by the CWA. The NPDES permit is the mechanism used to implement technology- and water quality-based effluent limitations, as well as other requirements including monitoring and reporting. This draft NPDES permit was developed in accordance with various statutory and regulatory requirements established pursuant to the CWA and any applicable State administrative rules. The regulations governing EPA's NPDES permit program are generally found in 40 CFR Parts 122, 124, 125 and 136. The general conditions of the Draft Permit Modification are based on 40 CFR § 122.41 and consist primarily of management requirements common to all permits. The effluent monitoring requirements have been established to yield data representative of the discharge under authority of § 308(a) of the CWA in accordance with 40 CFR § 122.41(j), § 122.44(i), and § 122.48.

When establishing NPDES permit requirements, EPA is required to consider, and include limitations in the permit, based on the most stringent of the following concepts: (a) technology-based requirements, (b) water quality-based requirements, (c) antibacksliding from the limitations and requirements in the current permit, and (d) antidegradation requirements.

Technology-based treatment requirements represent the minimum level of control that must be imposed under §§ 301(b) and 402 of the CWA (See 40 CFR Part 125, Subpart A). Subpart A of 40 CFR Part 125 establishes criteria and standards for the imposition of technology-based treatment requirements in permits under § 301(b) of the CWA, including the application of EPA promulgated effluent limitations and, in the absence of promulgated technology-based effluent guidelines, Best Professional Judgment (BPJ) for case-by-case determinations of effluent limitations under § 402(a)(1)(B) of the CWA. Although EPA has promulgated Effluent Limitations Guidelines (ELGs) for Concentrated Aquatic Animal Production (CAAP) facilities, Alden does not qualify as a CAAP as defined in Appendix C of 40 CFR Part 122. Therefore, ELGs are not applicable in this case and EPA has relied on BPJ for determinations of effluent limits as allowed under Section 402(a)(1)(B) of the CWA.[1]

Water quality-based requirements are necessary where effluent limits more stringent than technology-based limits are necessary to maintain or achieve federal or state water quality standards. Under § 301(b)(1)(C) of the CWA, discharges are subject to effluent limitations based on federal or state water quality standards. Receiving water requirements are established according to numerical and narrative standards in the state's water-quality standards adopted under state law for each stream classification.

The effluent monitoring requirements have been established to yield data representative of the discharges under the authority of Section 308(a) of the CWA, according to regulations set forth at 40 CFR § 122.41(j), 122.44(i), and 122.48. The monitoring program in the permit specifies routine sampling and analysis which will provide information on the reliability and effectiveness of the filtration equipment and ensure compliance with the requirements of this permit modification. The approved analytical procedures are to be found in 40 CFR 136 unless other procedures are explicitly required in the permit.

Narrative criteria from the state's water-quality standards are often used to limit toxicity in discharges where: (1) a specific pollutant can be identified as causing or contributing to the toxicity but the state has no numeric standard; or (2) toxicity cannot be traced to a specific pollutant. The Massachusetts Surface Water Quality Standards (314 CMR 4.00) contain numerical requirements for conventional and toxic pollutants in order to provide protection for designated uses in the receiving waters. Included in these Standards are provisions that EPA's National Recommended Water Quality Criteria for toxic pollutants, established pursuant to § 304(a) of the CWA, shall be used unless site-specific criteria are established. The state will limit or prohibit discharges of pollutants to surface waters to assure that surface water quality standards of the receiving waters are protected and maintained, or attained.

[1] On August 23, 2004, the EPA promulgated new Effluent Limitations Guidelines and New Source Performance Standards for CAAP facilities. As defined at 40 CFR § 122.24 and Appendix C of 40 CFR Part 122, a CAAP facility is a hatchery, fish farm, or other facility which, for coldwater fish species, includes facilities that discharge at least 30 days per year, but excludes those facilities which produce less than 20,000 lbs of harvestable weight of fish in a given year and which feed less than 20,000 lbs of food during the calendar month of maximum feeding {See 40 CFR § 122.24, § 122.25, and Appendix C of Part 122]. Under this definition, Alden does not qualify as a CAAP because it (1) operates as a research facility and does not produce fish for harvest; (2) proposes to discharge less than 30 days per year; and (3) estimates the combined maximum capacity of the testing facilities in Buildings 6 and 15 at 15,000 pounds of fish per year.

Anti-backsliding as defined in § 402(o) of the CWA and implementing regulations at 40 CFR §122.44(l) require reissued permits to contain limitations as stringent as or more stringent than those of the previous permit unless the circumstances allow application of one of the defined exceptions to this regulation.

In accordance with regulations found at 40 CFR § 131.12, each state must adopt a statewide antidegradation policy to maintain and protect existing in-stream water quality. The Massachusetts Antidegradation Policy found at 314 CMR 4.04 prohibits lowering of water quality, except in accordance with the antidegradation policy. This exception applies in situations where a lowering of water quality is being proposed, such as a new discharge or an increased discharge of pollutants at a facility with an existing permit. In the case of this Draft Permit Modification, a new discharge is being proposed; however, EPA has determined that the water quality in Chaffins Brook will be maintained provided the permit requirements are met.

Facility Information

The testing facilities' combined annual production is currently about 15,000 pounds (lbs) of fish. Fish are not harvested or sold, but euthanized following testing. Each fish testing facility operates a closed-loop system in which water is filtered and recirculated. Fish are placed in the test tanks for a short time (typically no longer than 6 hours) and removed and held in separate holding facilities following testing. Feeding is not conducted in the test facilities and no chemicals are added to testing water. Water quality in the closed-loop testing facilities is maintained with high capacity bag filters with a maximum 25 micron filtration element to remove particulates and a UV light filter to sterilize the water.

In addition to its fish testing facilities, Alden has fish holding facilities that house fish for testing. Wastewater from the fish holding facilities is generated by facility maintenance, cleaning equipment, filter backwash, and water changes, may contain solid wastes. This wastewater is circulated through a settling tank, after which it is filtered with high capacity bag filters (maximum 25 micron filtering capability) and sterilized with a UV light. A biological filtration system removes ammonia. Settling tanks are cleaned with a vacuum pump and solid wastes incinerated on the property. In addition, small volumes of chemicals such as Salt-Instant Ocean Mix (to adjust salinity), sodium biocarbonate (a pH buffer), calcium chloride (to increase hardness), ammonia (to adjust pH and activate bio-filtration), clove oil (an anesthetic), and formaldehyde (for disinfection and as a preservative) may be used in holding tanks. Wastewater, defined as all water from holding facilities and backwash from closed-loop filtering systems in fish testing facilities is transported to Blackstone Treatment Facility for disposal. Discharge from Outfalls 003 and 004 must be limited to filtered water from fish testing tanks in Buildings 6 and 15.

Permitted Outfalls – 003 and 004

This draft permit modification only authorizes the discharges of filtered water from fish testing tanks housed in Buildings 6 and 15 from Outfalls 003 and 004. The source of water for the testing facilities is municipal water from the Town of Holden. Effluent may be discharged from a point following the closed-loop filtration system into Chaffins Brook, a tributary of Wachusett Reservoir. This discharge must not cause a violation of the water quality standards of the Class

A receiving water. Chemicals, in any concentration, are prohibited from being discharged into the receiving water. Discharge of water from the holding tanks, bag filters, screen backwash, and associated equipment is prohibited. All wastewater must be transported to the Blackstone Treatment Facility.

Available Dilution

In order to determine whether discharge levels would contribute or cause source water quality violations, and to establish water quality-based limitations, EPA calculated available dilution of Chaffins Brook. Title 314 CMR 4.03(3)(a) requires that effluent dilution of a freshwater river be calculated based on the receiving water 7Q10. The 7Q10 is the lowest observed mean river flow for 7 consecutive days, recorded over a 10-year recurrence interval. Additionally, the facility design flow is used to calculate available effluent dilution. The 7Q10 for Chaffins Brook was estimated with StreamStats, a web-based tool offered by United States Geological Survey (USGS) to obtain streamflow statistics, drainage basin characteristics, and other information for user-selected sites. For an ungaged site, such as Chaffins Brook (i.e., no USGS gage currently exists for the site), a GIS program estimates the boundary of the drainage basin above the site, measures the physical characteristics of the drainage basin, and solves the appropriate regression equations to determine streamflow statistics for the site. StreamStats estimated the 7Q10 flow for Chaffins Brook at the facility to be 0.18 cfs based on a drainage basin area of 5.05 square miles. The dilution factor is calculated as follows:

$$\text{Dilution Factor} = \frac{(\text{7Q10 Flow}) + (\text{Design Flow})}{\text{Design Flow}}$$

$$\text{Dilution Factor} = \frac{(0.18\ \text{cfs}) + (0.155\ \text{cfs})}{(0.155\ \text{cfs})} = 2.2$$

A dilution factor of 2.2 was used to calculate water quality-based effluent limits for priority pollutants in this Draft Permit Modification.

Derivation of Effluent Limits under the Federal CWA and/or Massachusetts State Water Quality Standards

The Draft Permit Modification establishes effluent limitations and/or monitoring requirements for flow, pH, temperature, dissolved oxygen (DO), biochemical oxygen demand ($BOD_{5)}$, total suspended solids (TSS), Total Nitrogen, Total Phosphorus, specific conductance, Total Residual Chlorine, and Total Copper. The discharge is a new source of pollutants at the facility and the sensitive nature of the receiving water demands rigorous limits to ensure the water quality standards for Class A waters are met. In addition, Alden is responsible for ensuring that concentrations of priority pollutants in its discharge meet State and National Water Quality Criteria, even if Alden is not the source of the pollutants. Effluent limits are based on BPJ of appropriate technology, state and national water quality standards, and antidegradation policy.

Flow

Discharge flows at this facility vary depending on the research being conducted. Periodic discharge from Outfalls 003 and 004 will primarily occur between April and December; the

permittee proposes to drain and fill the fish testing tanks two to five times per year. The draft permit modification applies the average monthly flow limit of 100,000 gpd from the current permit to include new discharges from Outfalls 003 and 004 as well as existing discharges from Outfalls 001 and 002. During discharge from Outfalls 003 and 004, flows will be measured continuously with a flowmeter and maximum daily flows reported. Flows from Outfalls 001 and 002 will continue to be estimated as indicated in the current permit.

pH

The draft permit modification requires maximum daily pH from Outfalls 003 and 004 within the range of 6.5 to 8.3 standard units based on state water quality standards. pH must be measured once per discharge event.

Temperature

The Draft Permit Modification includes a reporting requirement for temperature. The temperature of the testing tanks ranges from a minimum of mid-30˚F in the winter to a few degrees below ambient temperatures. Discharge from the fish testing tanks is not likely to violate state water quality standards, thus, no temperature limit is needed. Temperature will be measured once per discharge event downstream of the filtration unit and prior to mixing with any other stream. A discharge temperature exceeding ambient temperatures in the receiving water represents a change in the facility's operation and must be addressed through a permit modification.

Dissolved Oxygen

A minimum concentration of DO is needed for fish and other aquatic life. According to MassDEP's 1998 Water Quality Assessment, the highest temperature in Chaffins Brook was 23°C, and 10 percent of measurements in June, July and August exceeded 20°C, which meets criteria for a cold water fishery defined by state water quality standards at 314 CMR 4.02 as "waters in which the maximum mean daily temperature over a seven day period generally does not exceed 20°C." In addition, Wachusett Reservoir offers year-round populations of cold water stenothermal aquatic life such as Atlantic salmon and trout. As such, DO levels must not be less than 6.0 mg/l, as required by a cold water fishery in state water quality standards at 314 CMR 4.05(3)(a). DO will be monitored once per discharge event downstream of the filtration unit and prior to mixing with any other stream.

BOD_5 and TSS

Given that Alden filters the effluent with a microscreen prior to discharge, a monitoring-only requirement for BOD_5 and TSS is included in the draft permit modification. A monitoring requirement for TSS and BOD_5 is included to ensure that the discharge will not impair the designated uses of Chaffins Brook.

Total Nitrogen and Total Phosphorus

According to state water quality standards at 314 CMR 4.05(5)(c), "all surface waters shall be free from nutrients in concentrations that would cause or contribute to impairment of existing or designated uses." Monitoring nutrient levels once per discharge event is required in order to

observe the amount of nitrogen and phosphorus being added to the watershed. This information, when combined with nutrient information from other sources, will help determine total nutrient loadings to the watershed and subsequent permit limits, if warranted.

Specific Conductance

When marine species are tested, salt water is needed at a maximum concentration of 28 ppt. The permit modification requires the facility to reduce any tank water to a specific conductance no more than 250 µmho/cm (approximately 0.16 ppt) before discharge. Alternatively, if salinity cannot meet the requirements of this permit modification, the facility shall transport the discharge to Blackstone Wastewater Treatment Plant. This requirement is based on the recommendation of the Massachusetts Department of Conservation and Recreation in a letter to the facility dated April 4, 2007 and provided with the application for this permit modification.

Total Residual Chlorine

Alden has committed to using only UV light for disinfection in the future in an effort to reduce toxins present on site. Tanks are manually scrubbed without the use of chemicals and UV light is used to kill pathogens. On the rare occasion that chlorine is used, water containing chlorine is filtered to waste tanks where it is circulated until chlorine levels are non-detectable prior to discharge. The BMP plan as described below must include the procedure for neutralizing and disposing of chlorinated water.

According to the 2006 Annual Drinking Water Report from the Town of Holden, the source water has levels of chlorine that exceed the freshwater acute water quality standard. The Town of Holden has reported maximum chlorine levels as high as 2.2 milligrams per liter (mg/L), with an average of 0.37 mg/L. The acute nationally recommended water quality criterion for freshwater aquatic life is 0.019 mg/L. Effluent at Alden was not tested for chlorine, however, levels of chloroform and chlorodibromomethane in the effluent, which are byproducts of drinking water chlorination, far exceeded freshwater acute water quality criteria. The freshwater acute water quality criterion for chloroform is 5.7 micrograms per liter (µg/L), and reported levels in the effluent samples at both Building 6 and 15 were 8.82 µg/L. The freshwater acute water quality criterion for chlorodibromomethane is 0.04 µg/L and reported levels in the effluent samples were 1.01 µg/L.

Chlorine and chlorine compounds can be extremely toxic to aquatic life. EPA is concerned with the discharge of high concentrations of chlorine into Chaffins Brook, particularly because it currently does not fully support aquatic life uses. Thus, the draft permit modification includes a limit for total chlorine based on acute freshwater aquatic life nationally recommended water quality criteria.

Total Residual Chlorine Limitations:

Acute (Maximum Daily Limit) = (acute criteria x dilution factor)

Acute (Maximum Daily Limit) = (19 µg/l x 2.2) = 41.8 µg/l = 0.042 mg/l

The maximum daily limit for total residual chlorine in the draft permit modification is 0.042 mg/L. Because the discharge is intermittent and the duration is likely to be short, no monthly average limit (chronic freshwater criteria) was included.

Copper

According to the 2006 Annual Drinking Water Report from the Town of Holden, the source water has high levels of copper, which exceed the freshwater acute National Water Quality Criteria of 0.013 mg/L. The Town of Holden has reported 90th percentile copper levels of 0.69 mg/L (i.e., out of every 10 homes sampled, 9 were at or below this). Reported copper levels in samples of Alden's effluent at both testing facilities were as high as 0.04 mg/L

EPA is concerned about the high levels of copper in the effluent given the potentially lethal effects on aquatic life. Alden is responsible for the discharge and any impacts it may have on designated uses in the receiving water due to high levels of copper in its discharge. The maximum daily limit for copper is based on the acute *National Recommended Water Quality Criteria* for freshwater aquatic life (including Appendix B: Parameters for Calculating Freshwater Dissolved Metals Criteria that are Hardness Dependent), hardness estimated from the 2006 Annual Drinking Water Quality Report for the Town of Holden, and the 7Q10 dilution factor.

Water Quality Criteria for Copper:

Acute (Maximum Daily Limit) = (acute criteria x dilution factor)

Acute Criteria = $\exp\{m_a[\ln(\text{hardness})] + b_a)$ x (conversion factor)

$m_a = 0.9422$ hardness = 25.4 $b_a = -1.7$ conversion factor = 0.96

Acute Criteria = $\exp\{0.9422[\ln(25.4)] + -1.7\}$ x (0.96) = 3.695

Acute (Maximum Daily Limit) = (3.695 µg/l x 2.2) = 8.13 µg/l = 0.0081 mg/l

The maximum daily limit for total copper in the draft permit modification is 0.0081 mg/L. Because the discharge is intermittent and the duration is likely to be short, no monthly average limit (chronic freshwater criteria) was included.

Other permit requirements

In addition to these specific effluent limitations, the permit contains general limitations to comply with state water quality standards on such things as color, oil sheen, foam, floating or settleable solids, and non-specific toxic chemicals. This permit modification includes provisions containing detailed requirements for reporting spills and structural damage and/or failure of testing or holding tanks, as well as preparing, submitting to EPA, and carrying out Best Management Practices (Part I.B. Narrative Requirements). These provisions are key components of the permit modification to ensure compliance with both technology and water quality requirements.

EPA is requiring a site-specific Best Management Practices (BMP) plan for the facility based on BPJ under § 402(a)(1)(B) of the CWA. BMPs require the permittee to develop and employ methods for feed management, removal of accumulated solids, storage of drugs and pesticides,

spill prevention, management of the wastewater treatment system, maintaining accurate records, and ensuring that all personnel receive proper training. In addition to these practices, two additional categories have been added to the Draft Permit: (1) detailing precautions taken to prevent aquatic organisms that are neither indigenous nor naturalized to Massachusetts waters from becoming established in local surface waters; and (2) identifying and quantifying all aquaculture drugs and chemicals used at the facility.

EPA believes a BMP plan is necessary at this facility in order to document the procedures and protocols that ensure the high quality of the effluent and protect the designated uses of the receiving water. The draft permit modification primarily includes monitoring-only requirements except where numeric limits are set by state water quality standards. To supplement the monitoring-only requirements, Alden's BMP plan must document procedures to prevent toxic discharge to the receiving water, including use of chemicals, solids disposal, wastewater protocol, and describe how discharge is initiated and terminated. EPA shall be notified if procedures other than those documented in the BMP plan are implemented at the facility.

On rare occasions when medications are administered at the facility, a quarantine tank is used to isolate the fish needing treatment. Fish are transferred to the quarantine tank for the requisite period of time for treatment before being returned to the holding facility. The quarantine tank is discharged as wastewater to the waste tank and transferred to the Blackstone Wastewater Treatment Plant for treatment. Given these practices, no permit limit is established for chemicals; however, the BMP plan shall describe procedures related to chemical usage at the facility.

All other conditions of the existing Permit, including effluent limitations and monitoring requirements, will remain unchanged.

Antidegradation

The CWA requires that EPA obtain State Certification which states that all water-quality standards will be satisfied. The permit must conform to the conditions established pursuant to a State Certification under Section 401 of the CWA (40 CFR § 124.53 and § 124.55). EPA regulations pertaining to permit limits based upon water-quality standards and state requirements are contained in 40 CFR §122.44(d). EPA expects the State of Massachusetts to determine that there is no lowering of water quality and no loss of existing water uses and that no additional antidegradation review is warranted at this time.

IV. STATE CERTIFICATION REQUIREMENTS

EPA may not issue a permit or a permit modification unless the State Water Pollution Control Agency with jurisdiction over the receiving waters certifies that the effluent limitations and conditions contained in the permit or permit modification are stringent enough to assure that the discharge will not cause the receiving water to violate State Water Quality Standards. The staff of the Massachusetts Division of Watershed Management will review the draft Permit Modification and advise EPA that the limitations and conditions are adequate to protect water quality. EPA has requested permit modification certification by the State and expects that the draft Permit Modification will be certified.

V. PUBLIC COMMENT PERIOD AND PROCEDURE FOR FINAL DECISION

All persons, including applicants, who believe any condition of the draft Permit Modification is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period to Danielle Gaito, U.S. EPA, Office of Ecosystem Protection, One Congress Street, Suite 1100 (CIP), Boston, Massachusetts 02114-2023. EPA and MassDEP are only taking public comment on the parts of the Permit proposed to be modified. Since the rest of the Permit is not being reopened at this time, we are not taking public comment on any other parts of the Permit.

Any person, prior to the close of the public comment period, may submit a request in writing for a public hearing to consider the draft Permit Modification to EPA and MassDEP. Such requests shall state the nature of the issues proposed to be raised in the hearing. A public hearing may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates significant public interest. No public hearing has been scheduled at this time. In reaching a final decision on the Permit Modification, the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator will issue a final permit modification decision and forward a copy of the final decision to the permittee and each person who has submitted written comments or requested notice. Within 30 days following the notice of the final permit modification decision, any interested party may file an appeal to contest the final decision. Procedures for filing an appeal will be explained when the final Permit Modification is issued.

VI. EPA CONTACT

Additional information concerning the draft permit modification may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

Danielle Gaito
Office of Ecosystem Protection
U.S. Environmental Protection Agency
1 Congress Street, Suite 1100 (CIP)
Boston MA 02114-2023
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Paul Hogan
Mass. Department of Environmental Protection
627 Main Street
Worcester MA 01608
Tel: (508)767-2796
paul.hogan@state.ma.us

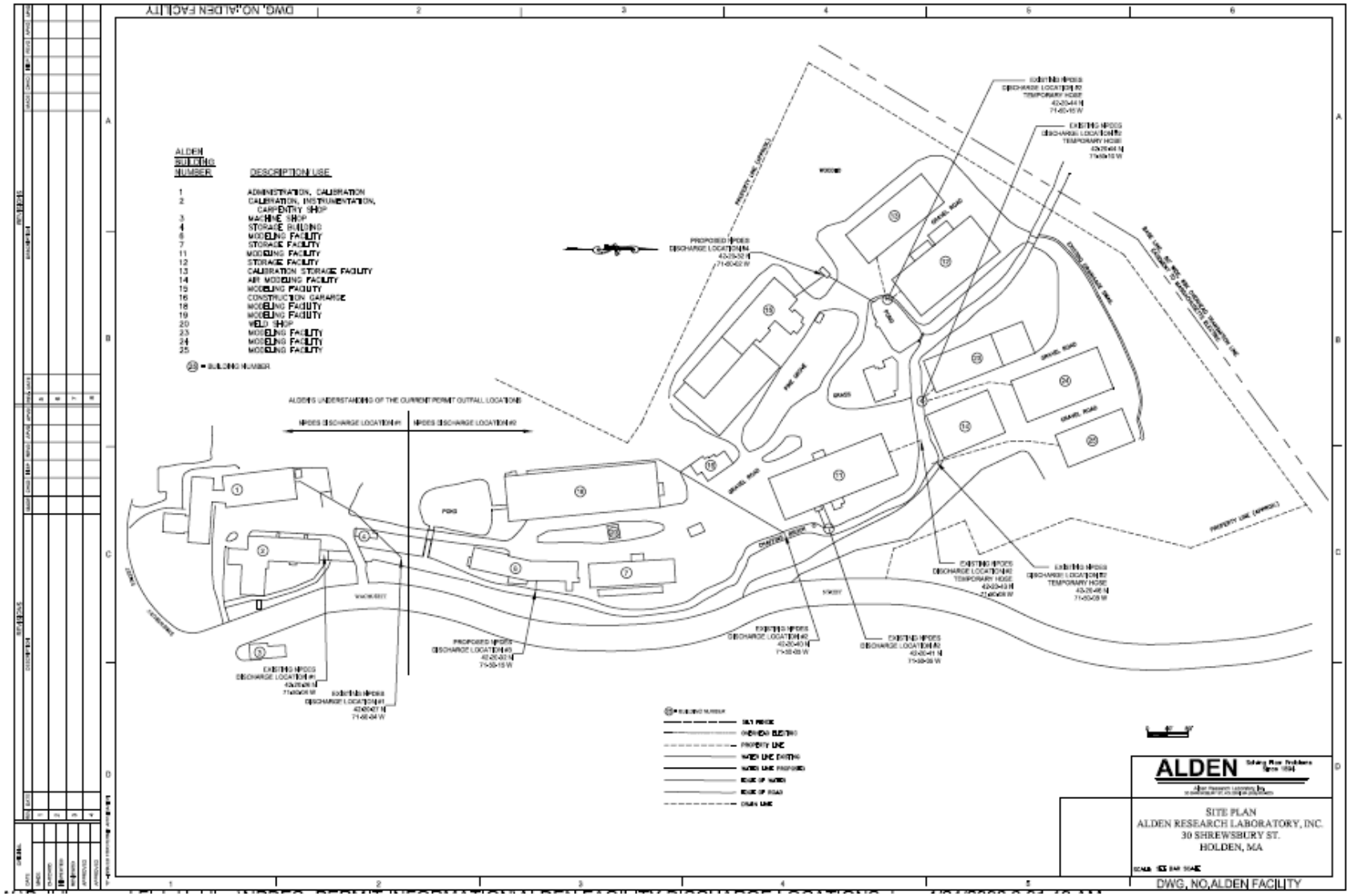
_____ _____

Date

Stephen Perkins, Director*
Office of Ecosystem Protection
U.S. Environmental Protection Agency
Boston, MA

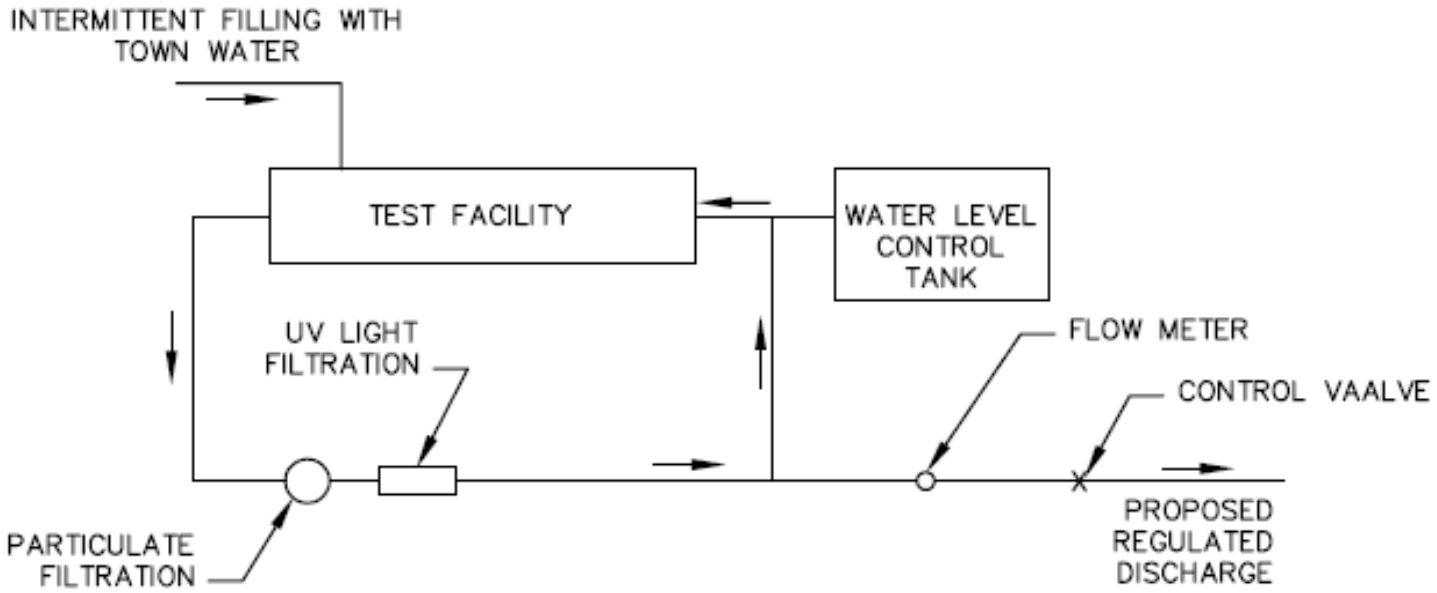
* Please address comments to both Ms. Danielle Gaito and Mr. Paul Hogan

ATTACHMENT A



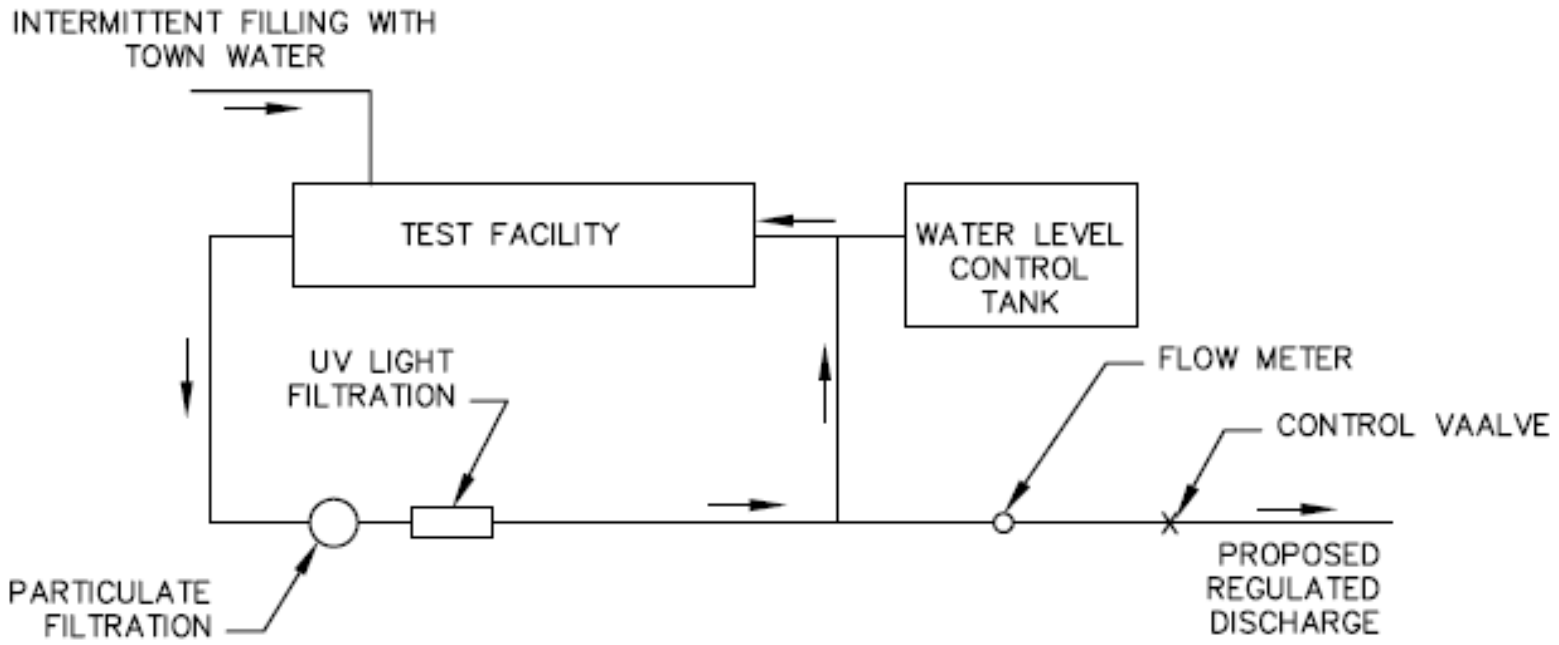
ATTATCHMENT B

Line Drawing Outfall 003 from Building No. 6



Note: The test facility operates as a closed loop facility and water will only be discharged for facility modifications/maintenance.

Line Drawing Outfall 004 from Building No. 15



Note: The test facility operates as a closed loop facility and water will only be discharged for facility modifications/maintenance.