



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

VIA EMAIL

October 16, 2023

Vincent Roy, Executive Director
Well 8 Water Treatment Facility
200 East Street
Sudbury, MA 01776
vory@sudburywater.com

Re: Authorization to discharge under the 2023 NPDES Potable Water Treatment Facilities General Permit (PWTFGP) – Authorization No. MAG640056 for the Well 8 Water Treatment Facility in Sudbury, MA

Dear Vincent Roy:

Based on the review of your Notice of Intent (NOI) received October 12, 2023, the U.S. Environmental Protection Agency (EPA) hereby authorizes the Sudbury Water District (the Permittee) to discharge from the Well 8 Water Treatment Facility (the Facility) in accordance with the provisions of the National Pollutant Discharge Elimination System (NPDES) Potable Water Treatment Facilities General Permit (PWTFGP or General Permit). The Facility's General Permit Number is indicated above and should be referenced on all correspondence. The effective date of coverage is December 1, 2023.

Your permitted discharge is to Hop Brook, a Class B waterbody. Attached to this PWTFGP authorization to discharge is a summary of effluent limitations and monitoring requirements applicable to your discharge. Please be aware that sufficiently sensitive test methods must be used for any sample analysis conducted in accordance with this permit. See Part III.A.1 of the General Permit.

The summary presented in this authorization letter does not represent the complete requirements of the PWTFGP. Permittees must comply with all the applicable requirements of this General Permit such as discharge limits and monitoring requirements, state certification conditions, administrative provisions, and other additional requirements including a Best Management Practices (BMP) plan. The complete PWTFGP and other related information can be found at <https://www.epa.gov/npdes-permits/potable-water-treatment-facility-general-permit-pwtf-gp-massachusetts-new-hampshire>.

Please note that Part V of the PWTFGP includes all monitoring, record-keeping and reporting requirements for the Facility that will become effective on the 1st day of the month following the date of signature on this letter. Facilities are now required to submit monitoring results on a monthly, not quarterly, basis. Unless the Permittee has received an approved Opt-Out Request,

the Permittee shall electronically submit its monthly monitoring data in discharge monitoring reports (DMRs) to EPA and the Massachusetts Department of Environmental Protection (MassDEP) using NetDMR. NetDMR is accessed from the internet at <https://cdx.epa.gov>. NetDMR reporting is due no later than the 15th day of the month following the completed reporting period. When DMRs are submitted electronically using NetDMR, the submittal of hard copies is not required.

This General Permit and authorization to discharge expires September 30, 2028, except as provided in Part VI.B, or upon submission of a Notice of Termination. EPA appreciates your cooperation in applying for coverage under this General Permit. If you have additional questions, please contact Nathan Chien at chien.nathan@epa.gov or (617) 918-1649.

Sincerely,

Ellen Weitzler, Supervisor
Industrial and Municipal Permits Section
Water Division, EPA Region 1

cc: Xiaodan Ruan, MassDEP (xiaodan.ruan@state.ma.us)
Ted McAuliffe, Sudbury Water District (tmcauliffe@sudburywater.com)

Part III. General Permit Requirements

A. Effluent Limitations and Monitoring Requirements

1. Continuous and Intermittent Dischargers

Continuous and Intermittent Dischargers are defined as those facilities that discharge more frequently than once per month or twelve times per year.

During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge wastewaters from potable water treatment facilities to the receiving water in the Permittee’s authorization letter, unless the waters are restricted as noted in Section I.C. The discharge and receiving water shall be limited and monitored as detailed below and further specified in the facility’s authorization letter.

The General Permit contains site-specific effluent limitations for total residual chlorine, total aluminum, and Whole Effluent Toxicity. See Appendix H. These conditions were derived in part from facility monitoring data and previously submitted NOIs. EPA will update these effluent limitations as necessary based on any new information received in the permittee’s updated NOI. While the limitations may change, the process for deriving these limitations will not.

Effluent Characteristic	Effluent Limitation		Monitoring Requirements ^{1,2,3}	
	Average Monthly	Maximum Daily	Measurement Frequency	Sample Type ⁴
Effluent Flow ⁵	Report MGD	1.0 MGD	Continuous	Recorder
TSS	30 mg/L	50 mg/L	1/Week	Composite
pH Range ⁶	6.5 – 8.3 S.U.		1/Week	Grab
Total Residual Chlorine ^{7,8}	11 µg/L	19 µg/L	1/Week	Grab
PFAS Analytes ^{17,18}	---	Report ng/L	2/Year or less	Composite
Adsorbable Organic Fluorine ^{17,19}	---	Report ng/L	2/Year or less	Composite

Footnotes:

1. All samples shall be collected in a manner to yield representative data. A routine sampling program shall be developed in which samples are taken at the same location, same time, and same days of the week each month unless noted elsewhere. Occasional deviations from the routine sampling program are allowed, but the reason for the deviation shall be documented as an electronic attachment to the applicable discharge monitoring report. The Permittee shall report the results to the Environmental Protection Agency Region 1 (EPA) and the State of any additional testing above that required herein, if testing is in accordance with 40 CFR Part 136. Any change in sampling location from the one specified in the NOI shall be reviewed in writing by EPA and the State.

2. In accordance with 40 CFR § 122.44(i)(1)(iv), the Permittee shall monitor according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O, for the analysis of pollutants or pollutant parameters (except WET). A method is “sufficiently sensitive” when: 1) The method minimum level (ML) is at or below the level of the effluent limitation established in the permit for the measured pollutant or pollutant parameter; or 2) The method has the lowest ML of the analytical methods approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O for the measured pollutant or pollutant parameter. The term “minimum level” refers to either the sample concentration equivalent to the lowest calibration point in a method or a multiple of the method detection limit (MDL), whichever is higher. Minimum levels may be obtained in several ways: They may be published in a method; they may be based on the lowest acceptable calibration point used by a laboratory; or they may be calculated by multiplying the MDL in a method, or the MDL determined by a laboratory, by a factor.
3. When a parameter is not detected above the ML, the Permittee must report the data qualifier signifying less than the ML for that parameter (e.g., < 50 µg/L, if the ML for a parameter is 50 µg/L). For reporting an average based on a mix of values detected and not detected, assign a value of “0” to all non-detects for that reporting period and report the average of all the results.
4. A “grab” sample is an individual sample collected in a period of less than 15 minutes.

A “composite” sample is a composite of at least four (4) grab samples collected at approximately equal intervals on a flow weighted basis during the time at which the discharge is entering the receiving water over an interval representative of the process (e.g., a backwash cycle).

The timing of grab samples (e.g., for pH and total residual chlorine) shall correspond with the timing of composite sampling for the other parameters.

5. The daily maximum flow limit allowed by this General Permit shall be equal 1.0 million gallons per day (MGD).
6. The pH shall be within the following range based on State and waterbody classification:

Massachusetts (Class A and B): 6.5 – 8.3 S.U. and the discharge shall not cause a change in pH of the receiving water more than 0.5 S.U. outside of the natural background conditions.

The minimum and maximum pH sample measurement values for the month shall be reported in standard units (S.U.).
7. Limits and monitoring for total residual chlorine (TRC) are only required for discharges that have been previously chlorinated or contain residual chlorine.

8. TRC analysis must be completed using a test method in 40 CFR Part 136 that achieves a minimum level no greater than 20 µg/L. For any limits below this minimum level, the compliance level for the limit will be set at 20 µg/L.
9. N/A
10. N/A
11. N/A
12. N/A
13. N/A
14. N/A
15. N/A
16. N/A
17. All permittees are required to sample for PFAS analytes (Appendix J) and Adsorbable Organic Fluorine (AOF). Monitoring for PFAS analytes begins six months from the permittee's authorization date during the first full semi-annual period. Semi-annual periods are defined as January-June and July-December. Analysis is required using an analytical method approved in 40 CFR Part 136 or, if no method is approved, EPA Method 1633. Monitoring for AOF begins six months after EPA notifies the permittee that a multi-lab validated or CWA-approved method is available (e.g., EPA Draft Method 1621).

After completing three rounds of PFAS monitoring, the Permittee may request that PFAS monitoring be terminated if (1) none of the samples had detectable concentrations (as defined in the laboratory procedure) of any of the PFAS analytes, (2) the discharge is not from treated groundwater, and (3) the discharge is not directly to or upstream of a drinking water treatment source. EPA and the State will make a facility-specific determination based on the Permittee's monitoring termination request whether to discontinue the monitoring.

After completing three rounds of AOF monitoring, the Permittee may request that AOF monitoring be terminated if none of the samples had reportable concentrations of AOF (as defined in the laboratory procedure). EPA and the State will make a facility-specific determination based on the Permittee's monitoring termination request whether to discontinue the monitoring.

18. Report in nanograms per liter (ng/L). Until there is an analytical method approved in 40 CFR Part 136 for PFAS, monitoring shall be conducted using Draft Method 1633. Report in NetDMR the results of all PFAS analytes required to be tested in Method 1633, as shown in Appendix J.

For those permittees required to sample twice per year, monitoring shall be conducted twice per year as specified in the Permittee's authorization letter.

19. Report in nanograms per liter (ng/L). Until there is an analytical method approved in 40 CFR Part 136 for Adsorbable Organic Fluorine, monitoring shall be conducted using Draft Method 1621. Monitoring shall be conducted twice per year as specified in the Permittee's authorization letter.