



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

VIA EMAIL - READ RECEIPT REQUESTED

March 10, 2021

Dr. Luciana Burdi
Director, Capital Programs and Environmental Affairs
Massachusetts Port Authority
1 Harborside Drive
East Boston, MA 02128

Re: Minor Modification of NPDES Permit No. MA0032751
(for) the Massachusetts Port Authority's Fire Training Facility

Dear Dr. Burdi:

This letter addresses a minor modification to the National Pollutant Discharge Elimination System (NPDES) Permit No. MA0032751 ("Final Permit") issued to Massachusetts Port Authority (the "Permittee") for its fire training facility in East Boston, Massachusetts on January 27, 2021 by the United States Environmental Protection Agency's Region 1 office (EPA).

More specifically, this letter institutes a minor modification to the Final Permit pursuant to federal regulations found at 40 CFR § 122.63(a) to correct a typographical error. Part I.A.1 of the currently effective Final Permit requires the Permittee to sample parameters by a "Composite" sample type. However, the non-standard composite sample type currently defined in footnote 1 is poorly explained and in contradiction with the language in the footnote itself and the recommended sampling practices advised for those test methods. The current footnote requires that samples "are taken during each discharge event and prior to discharge from the above ground holding tank..." and also requires "Each sample shall be a composite of two (2) equally weighted (identical volume) grab samples taken during the first five (5) minutes of discharge and the last five (5) minutes of discharge." It is not clear from this language when and how many samples are to be taken and how they are to be composited. Furthermore, parameters such as pH, fecal coliform, *Enterococcus*, oil and grease, and volatile organic compounds are not amenable to compositing and instead should be sampled at a single point in time by a grab sample. Therefore, EPA finds it necessary to revise this error and require grab sampling in lieu of compositing.

Part I.A.1 of the Final Permit has been modified to change the required sample type from composite to grab and to properly define the sample procedure. The new language for footnote 1 will now read:


Effluent samples shall yield data representative of the discharge. A routine sampling program shall be developed in which grab samples are taken from the above ground holding tank prior to the discharge event.

This holding tank shall consist only of water that has undergone treatment through this facility, including oil/water separation, equalization, and carbon filtration. For those months when there are no discharges, the Permittee must report a No Data Indicator (NODI) Code (e.g., “C” for “No Discharge”) on the Discharge Monitoring Report (DMR). Changes in sampling location or methodology must be approved in writing by the Environmental Protection Agency Region 1 (EPA). The Permittee shall report the results to EPA and the State of any additional testing above that required herein, if testing is done in accordance with 40 CFR Part 136.

Since the permit has not yet become effective, the listed minor permit modification will take effect on the effective date of the currently issued permit, April 1, 2021.

Should you have any questions concerning the permit modification, please contact Nathan Chien at 617-918-1649 or at Chien.Nathan@epa.gov.

Sincerely,

**KENNETH
MORAFF**  Digitally signed by
KENNETH MORAFF
Date: 2021.03.10
08:59:33 -05'00'

Ken Moraff, Director
Water Division

Attachments: Final Modified Page of NPDES Permit No. MA0032751

cc: Susannah King, MassDEP
Catherine Vakalopoulos, MassDEP
Eric Wortman, EPA
Ian Campbell, MassPort

PART I**A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

1. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge treated fire training water and stormwater through Outfall Serial Number 001 to Boston Harbor. The discharge shall be limited and monitored as specified below.

Effluent Characteristic	Units	Effluent Limitations		Monitoring Requirements ^{1,2,3}	
		Average Monthly	Maximum Daily	Measurement Frequency ⁴	Sample Type
Effluent Flow	MGD	Report	0.021	1/Discharge Event	Estimate
Number of Discharge Events	Count/month	Report	---	1/Discharge Event	Count
Total Suspended Solids (TSS)	mg/L	Report	10	1/Discharge Event	Grab
pH ⁵	S.U.	6.5 - 8.5		1/Discharge Event	Grab
Fecal Coliform Bacteria ⁶	#/100 mL	Report	Report	1/Discharge Event	Grab
<i>Enterococcus</i> Bacteria ⁶	#/100 mL	Report	Report	1/Discharge Event	Grab
Oil and Grease (O&G) ⁷	mg/L	Report	15	1/Discharge Event	Grab
Total BTEX ⁸	µg/L	Report	100	1/Discharge Event	Grab
Benzene	µg/L	Report	5	1/Discharge Event	Grab
Toluene	µg/L	Report	Report	1/Discharge Event	Grab
Ethylbenzene	µg/L	Report	Report	1/Discharge Event	Grab
Total Xylenes	µg/L	Report	Report	1/Discharge Event	Grab
PAHs, Total, Group I ⁹	µg/L	Report	1	1/Discharge Event	Grab
Benzo(a)anthracene	µg/L	Report	0.1	1/Discharge Event	Grab
Benzo(a)pyrene	µg/L	Report	0.1	1/Discharge Event	Grab
Benzo(b)fluoranthene	µg/L	Report	0.1	1/Discharge Event	Grab

Effluent Characteristic	Units	Effluent Limitations		Monitoring Requirements ^{1,2,3}	
		Average Monthly	Maximum Daily	Measurement Frequency ⁴	Sample Type
Benzo(k)fluoranthene	µg/L	Report	0.1	1/Discharge Event	Grab
Chrysene	µg/L	Report	0.1	1/Discharge Event	Grab
Dibenzo(a,h)anthracene	µg/L	Report	0.1	1/Discharge Event	Grab
Indeno(1,2,3-cd)pyrene	µg/L	Report	0.1	1/Discharge Event	Grab
PAHs, Total, Group II ¹⁰	µg/L	Report	100	1/Discharge Event	Grab
Perfluorohexanesulfonic acid (PFHxS) ^{11,12}	ng/L	---	Report	1/Quarter	Grab
Perfluoroheptanoic acid (PFHpA) ^{11,12}	ng/L	---	Report	1/Quarter	Grab
Perfluorononanoic acid (PFNA) ^{11,12}	ng/L	---	Report	1/Quarter	Grab
Perfluorooctanesulfonic acid (PFOS) ^{11,12}	ng/L	---	Report	1/Quarter	Grab
Perfluorooctanoic acid (PFOA) ^{11,12}	ng/L	---	Report	1/Quarter	Grab
Perfluorodecanoic acid (PFDA) ^{11,12}	ng/L	---	Report	1/Quarter	Grab
Whole Effluent Toxicity (WET) Testing – Acute LC ₅₀ ^{13,14}	%	Report		1/Permit Term	Grab

Footnotes:

1. Effluent samples shall yield data representative of the discharge. A routine sampling program shall be developed in which grab samples are taken from the above ground holding tank prior to the discharge event. This holding tank shall consist only of water that has undergone treatment through this facility, including oil/water separation, equalization, and carbon filtration. For those months when there are no discharges, the Permittee must report a No Data Indicator (NODI) Code (e.g., “C” for “No Discharge”) on the Discharge Monitoring Report (DMR). Changes in sampling location or methodology must be approved in writing by the Environmental Protection Agency Region 1 (EPA). The Permittee shall report the results to EPA and the State of any additional testing above that required herein, if testing is done in accordance with 40 CFR Part 136.