

MASSACHUSETTS PERMIT TO DISCHARGE POLLUTANTS TO SURFACE WATERS

In compliance with the provisions of the Massachusetts Clean Waters Act, as amended (M.G.L. Chap. 21, §§ 26 - 53) and the implementing regulations at 314 CMR 3.00 and 4.00,

Hollingsworth & Vose Company

is authorized to discharge from the facility located at

Hollingsworth & Vose Company
112 Washington Street
East Walpole, MA 02032

to receiving water named

Neponset River (MA73-01)
Boston Harbor Watershed

in accordance with the following effluent limitations, monitoring requirements and additional conditions:

1. This permit shall become effective on March 26, 2021.
2. This permit shall expire on January 31, 2026.
3. This permit incorporates by reference Part IA., Effluent Limitations and Monitoring Requirements, Part IB., Unauthorized Discharges, Part IC., Special Conditions, Part ID. Reporting Requirements, and Part IIE., Standard Conditions, as set forth in the 2021 NPDES Permit No. MA0044996, issued by the United States Environmental Protection Agency (EPA), Region 1, issued to Hollingsworth & Vose Company on February 1, 2021 (the 2021 NPDES Permit) and attached hereto as Appendix A; provided, however:
 - a. that the notification required by Part IA.8. shall also be provided to MassDEP;
 - b. that the reporting required by Part IB.1 shall be in accordance with 314 CMR 3.19(20)(e) (24 hour reporting);
 - c. that discharges of a new chemical or additive authorized under Part IC.1. are only authorized under this permit 30 days following written notification to MassDEP, unless otherwise notified in writing by MassDEP;
 - d. that a copy of the requests, reports, and information required by Part ID.3. to be submitted to EPA shall also be submitted to MassDEP electronically to massdep.npdes@mass.gov;
 - e. that, if there is a conflict between the definitions in 314 CMR 3.02 and/or 314 CMR 4.00 and the definitions in Part IIE, the definitions in 314 CMR 3.02 and/or 314 CMR 4.00 shall control, as applicable;
 - f. that the notifications required by 3.a. and 3.c. above shall be provided as follows:

Susannah King, NPDES Section Chief
Division of Watershed Management
Department of Environmental Protection
1 Winter Street – 5th Floor
Boston, MA 02108

4. This permit incorporates by reference the Standard Permit Conditions set forth in 314 CMR 3.19.
5. This permit includes the following additional conditions:
 - a. Within six (6) months of the effective date of the permit, the permittee shall submit to MassDEP an evaluation of whether the facility uses any products containing any per- and polyfluoroalkyl substances (PFAS) and whether use of those products can be reduced or eliminated. The analysis shall be submitted electronically to massdep.npdes@mass.gov.
 - b. Within six (6) months after EPA's multi-lab validated method for wastewater is made available to the public on EPA's Clean Water Act methods program website¹, or two (2) years from the effective date of the NPDES permit, whichever is earlier, the permittee shall conduct monitoring of the effluent for PFAS compounds as detailed in the table below. Sampling of the intake water shall be conducted concurrently with sampling of the effluent. If any of the six (6) PFAS compounds are detected in the effluent, the permittee will analyze the intake water sample for all six (6) PFAS compounds. If EPA has not issued a validated test method by twenty (20) months after the effective date of the NPDES permit, the permittee shall contact MassDEP (massdep.npdes@mass.gov) for guidance on an appropriate analytical method. Notwithstanding any other provision of the 2021 Federal NPDES permit to the contrary, monitoring results shall be reported to MassDEP electronically (massdep.npdes@mass.gov) within 30 days after they are received. Those results do not need to be reported to EPA through NetDMR unless EPA establishes a requirement through a future permitting action.

Effluent (Outfall 002)

Parameter	Units	Measurement Frequency	Sample Type
Perfluorohexanesulfonic acid (PFHxS)	ng/L	Quarterly ²	24-hour Composite
Perfluoroheptanoic acid (PFHpA)	ng/L	Quarterly	24-hour Composite
Perfluorononanoic acid (PFNA)	ng/L	Quarterly	24-hour Composite
Perfluorooctanesulfonic acid (PFOS)	ng/L	Quarterly	24-hour Composite
Perfluorooctanoic acid (PFOA)	ng/L	Quarterly	24-hour Composite
Perfluorodecanoic acid (PFDA)	ng/L	Quarterly	24-hour Composite

- c. After completing one year of monitoring, if four (4) consecutive samples are reported as non-detect for all six PFAS compounds, then the permittee may submit a request to discontinue PFAS monitoring. After completing one year of monitoring, if the permittee sufficiently demonstrates that the detected PFAS compounds in the effluent are from the intake water from the Neponset River and not from the filtration process and the reverse osmosis system, the permittee may submit a request to MassDEP to modify the effluent and intake water monitoring requirements. MassDEP will make a determination based on the review and evaluation of the monitoring data. Any such requests shall be made in writing and sent to: massdep.npdes@mass.gov. The permittee shall continue such monitoring pending written approval from MassDEP to discontinue it.

¹ See <https://www.epa.gov/cwa-methods/other-clean-water-act-test-methods-chemical> and <https://www.epa.gov/cwa-methods>.

² Quarters are defined as January to March, April to June, July to September, and October to December. Samples shall be taken during the same month each quarter and shall be taken 3 months apart (e.g., an example sampling schedule could be February, May, August, and November).

Signed this 24th day of February, 2021

A handwritten signature in black ink, appearing to read "Lealdon Langley". The signature is fluid and cursive, with a prominent loop at the end.

Lealdon Langley, Director
Division of Watershed Management
Department of Environmental Protection

RESPONSE TO COMMENTS

**MA Permit No. MA0044996
Hollingsworth & Vose Company
112 Washington Street, East Walpole, Massachusetts**

The Massachusetts Department of Environmental Protection (MassDEP or the “Department”) is issuing a Surface Water Discharge (SWD) Permit to the Hollingsworth & Vose Company (the Permittee) for the facility (the Facility) located in East Walpole, Massachusetts. The permit is being issued under the Massachusetts Clean Waters Act, as amended (M.G.L. Chap. 21, §§ 26 - 53) and the implementing regulations at 314 CMR 3.00 and 4.00.

In accordance with the provisions of 314 CMR 2.09, MassDEP is obligated to prepare a response to comments received on the draft SWD Permit No. MA0044996 (the “Draft Permit”). The Response to Comments explains and supports MassDEP’s determinations that form the basis of the final permit (the “Final Permit”). From November 6, 2020 through December 7, 2020, MassDEP solicited public comments on the Draft Permit for the (re)issuance of a permit to discharge reverse osmosis (RO) reject water from Outfall Serial Number 002 to the Neponset River and the associated Draft WQC.

During the public comment period for the draft SWD Permit, MassDEP received comments from:

1. Hollingsworth & Vose Company on December 4, 2020.

MassDEP’s knowledge of the facility has benefited from the various comments and additional information submitted during the public comment period but the information and arguments presented did not raise any substantial new questions concerning the Permit that warranted MassDEP exercising the discretion to reopen the public comment period. MassDEP does, however, make certain clarifications in response to comments. Any improvements and changes are explained in this document and reflected in the Final Permit. Below, MassDEP provides a summary of the changes made in the Final Permit. The analyses underlying these changes are contained in the responses to individual comments that follow.

A copy of the Final Permit and this Response to Comments document will be posted on the MassDEP website.

A copy of the Final Permit may be also obtained by writing or calling Xiaodan Ruan, MassDEP, Surface Water Discharge Permitting Program, Bureau of Water Resources, 1 Winter Street – 5th Floor, Boston 02108; telephone: 617-654-6517; email: xiaodan.ruan@mass.gov. During this current COVID-19 emergency, MassDEP is working remotely. As such, interested parties are strongly encouraged to email MassDEP Xiaodan Ruan if they wish to obtain a copy of the Final Permit.

I. Summary of Changes to the Final Permit

1. Paragraph 5.b. has been revised by adding a condition “Sampling of the intake water shall be conducted concurrently with sampling of the effluent. If any of the six (6) PFAS compounds are detected in the effluent, the permittee shall analyze the intake water sample for all six (6) PFAS compounds.”
2. Paragraph 5.c. has been modified to include “After completing one year of monitoring, if the permittee sufficiently demonstrates that the detected PFAS compounds in the effluent are from the intake water from the Neponset River and not from the filtration process and the reverse osmosis system, the permittee may submit a request to MassDEP to modify the effluent and intake water monitoring requirements. MassDEP will make a determination based on the review and evaluation of the monitoring data.”

II. Responses to Comments

Comments are reproduced below as received; they have not been edited, corrected or otherwise modified.

A. Comments from Peter DiPasca, Environmental Compliance Manager, Hollingsworth & Vose Company on December 4, 2020.**Comment 1**

Permit Condition 5.b. and Certification Condition 1.b.

The effluent to be regulated by this permit is reject water from a reverse osmosis (RO) system. Intake water to the RO system is withdrawn from the Neponset River and then pumped through several filtration processes and the RO system. These systems are not designed to remove per and polyfluoroalkyl substances (PFAS), and no PFAS compounds are present in the filtration and RO equipment. Therefore, any detection of PFAS compounds in the effluent can be attributed to their presence in the intake water from the river.

If PFAS compounds are detected in the effluent, in order to demonstrate that the intake water is the source of PFAS compounds, H&V proposes to conduct sampling of the intake water when effluent sampling is conducted. The effluent sample shall be analyzed for PFAS compounds, and if any PFAS compounds are detected, then the intake water sample shall also be analyzed. If no PFAS compounds are detected in the effluent, then analysis of the intake water is not required. H&V proposes the following additional wording as the second sentence of Condition 5.b. in the draft permit and of Condition 1.b. in the draft certification:

Sampling of the intake water shall also be conducted concurrent with sampling of the effluent. Should PFAS compounds be detected in the effluent, then the permittee shall also analyze the intake water for PFAS compounds.

Response 1

MassDEP agrees that the PFAS compounds are unlikely to be present in the filtration processes and RO system. If detected in the effluent, the presence of PFAS compounds can be from the Neponset River intake water. MassDEP agrees with the approach H&V proposed to sample the intake water when the effluent sampling is conducted, and to analyze the intake water for the PFAS compounds only if PFAS is detected in the effluent. Paragraph 5.b. has been amended to include: "Sampling of the intake water shall be conducted concurrently with sampling of the effluent. If any of the six (6) PFAS compounds are detected in the effluent, the permittee shall analyze the intake water sample for all six (6) PFAS compounds."

Comment 2

Permit Condition 5.c. and Certification Condition 1.c. This condition states that the permittee may submit a request to discontinue PFAS monitoring if four (4) consecutive samples are reported as non-detect for all six PFAS compounds. This requirement may lead to unwarranted effort and laboratory expense to analyze and report PFAS compounds when some compounds are detected and some are not. H&V requests the ability to discontinue monitoring on an individual compound basis, not on the basis of the entire group of compounds.

H&V is also concerned that unwarranted monitoring of PFAS compounds shall be required when sampling and analysis of both the intake water from the river and the effluent to the river demonstrate that the river water is the source of PFAS compounds. The opportunity to discontinue 3 monitoring should also apply when individual PFAS compounds are detected in both the intake water and the effluent.

Therefore, H&V proposes the following change to the first sentence of Condition 5.c. in the draft permit and of Condition 1.c. in the draft certification:

After completing one year of monitoring, if four (4) consecutive samples are reported as nondetect for any of the individual PFAS compounds, and/or if four (4) consecutive sampling events of both the intake water from the river and of the effluent are conducted and the same PFAS compounds are detected in both the intake water and the effluent, then the permittee may submit a request to discontinue PFAS monitoring for those compounds.

Response 2

See Response to Comment 1. The language in Paragraph 5.c. remains unchanged in the State Final Permit in regards to discontinuation of effluent sampling. Continuing to monitor for all six PFAS compounds even if one or more compounds have not been detected should not pose any additional burden for the facility. The facility will only need to collect one effluent and intake sample per quarter for PFAS analysis regardless of the number of compounds being analyzed, and the cost of laboratory analysis for PFAS compounds is generally the same whether analysis is for one or multiple compounds.

Paragraph 5.c. has been modified to include a condition about sampling of the intake water: "After completing one year of monitoring, if the permittee sufficiently demonstrates that the detected PFAS compounds in the effluent are from the intake water from the Neponset River and not from the filtration process and the reverse osmosis system, the permittee may submit a request to MassDEP to modify the effluent and intake water monitoring requirements. MassDEP will make a determination based on the review and evaluation of the monitoring data."



Massachusetts Department of Environmental Protection
One Winter Street, Boston MA 02108 • Phone: 617-292-5751

Communication for Non-English Speaking Parties - 310 CMR 1.03(5)(a)



1 English:

This document is important and should be translated immediately. If you need this document translated, please contact MassDEP's Diversity Director at the telephone numbers listed below.



2 Español (Spanish):

Este documento es importante y debe ser traducido inmediatamente. Si necesita este documento traducido, comuníquese con el Director de Diversidad de MassDEP a los números de teléfono que aparecen más abajo.



3 Português (Portuguese):

Este documento é importante e deve ser traduzido imediatamente. Se você precisa deste documento traduzido, entre em contato com Diretor de Diversidade da MassDEP para os números de telefone listados abaixo.



4(a) 中國（傳統）(Chinese (Traditional)):

本文件非常重要，應立即翻譯。如果您需要翻譯這份文件，請用下面列出的電話號碼與 MassDEP 的多元化總監聯繫。



4(b) 中国（简体中文）(Chinese (Simplified)):

本文件非常重要，应立即翻译。如果您需要翻译这份文件，请用下面列出的电话号码与 MassDEP 的多元化总监联系。



5 Ayisyen (franse kreyòl) (Haitian) (French Creole):

Dokiman sa-a se yon bagay enpòtan epi yo ta dwe tradui imedyatman. Si ou bezwen dokiman sa a tradui, tanpri kontakte Divèsite Direktè MassDEP a nan nimewo telefòn ki nan lis pi ba a.



6 Việt (Vietnamese):

Tài liệu này rất quan trọng và cần được dịch ngay lập tức. Nếu bạn cần dịch tài liệu này, xin vui lòng liên hệ với Giám đốc Đa dạng của MassDEP theo các số điện thoại được liệt kê dưới đây.



7 ប្រទេសកម្ពុជា (Kmer (Cambodian)):

ឯកសារនេះគឺមានសារៈសំខាន់និងត្រូវបានបកប្រែភាសា ប្រសិនបើអ្នកត្រូវបានបកប្រែ ឯកសារនេះសូមទំនាក់ទំនងឆ្នោតជានាយក MassDEP នៅលេខទូរស័ព្ទដែលបានរាយខាងក្រោម។



8 Kriolu Kabuverdianu (Cape Verdean):

Es documento é importante e deve ser traduzido imidiatamente. Se bo precisa des documento traduzido, por favor contacta Diretor de Diversidade na MassDEP's pa es numero indicode li d'boche.



9 Русский язык (Russian):

Это важный документ и он должен быть безотлагательно переведен. Если вам нужен перевод данного документа, пожалуйста, свяжитесь с директором по разнообразию компании MassDEP по телефону указанному ниже

**10 العربية (Arabic):**

هذه الوثيقة مهمة ويجب ترجمتها على الفور. إذا كنت بحاجة إلى هذه الوثيقة المترجمة، يرجى الاتصال بمدير التنوع في MassDEP على أرقام الهواتف المدرجة أدناه.

**11 한국어 (Korean):**

이 문서는 중요하고 즉시 번역해야 합니다. 이 문서의 번역이 필요하시다면, 아래의 전화 번호로 MassDEP의 다양성 감독에 문의하시기 바랍니다.

**12 հայերեն (Armenian):**

Այս փաստաթուղթը շատ կարևոր է և պետք է թարգմանել անմիջապես. Եթե Ձեզ անհրաժեշտ է այս փաստաթուղթը թարգմանվել դիմել MassDEP բազմազանությունը տնօրեն է հեռախոսահամարների թվարկված են ստորև.

**13 فارسی (Farsi [Persian]):**

این سند مهم است و باید فوراً ترجمه شده است. اگر شما نیاز به این سند ترجمه شده، لطفاً با ما تماس تنوع مدیر MassDEP در شماره تلفن های ذکر شده در زیر.

**14 Français (French):**

Ce document est important et devrait être traduit immédiatement. Si vous avez besoin de ce document traduit, s'il vous plaît communiquer avec le directeur de la diversité MassDEP aux numéros de téléphone indiqués ci-dessous.

**15 Deutsch (German):**

Dieses Dokument ist wichtig und sollte sofort übersetzt werden. Sofern Sie die Übersetzung von diesem Dokument benötigen, wenden Sie sich bitte an den Diversity Director MassDEP unter der unten aufgeführten Telefonnummer.

**16 Ελληνική (Greek):**

Το παρόν έγγραφο είναι σημαντικό και θα πρέπει να μεταφραστεί αμέσως. Αν χρειάζεστε μετάφραση του παρόντος εγγράφου, παρακαλούμε επικοινωνήστε με τον Διευθυντή Διαφορετικότητας του MassDEP στους αριθμούς τηλεφώνου που αναγράφονται παρακάτω.

**17 Italiano (Italian):**

Questo documento è importante e dovrebbe essere tradotto immediatamente. Se avete bisogno di questo documento tradotto, si prega di contattare il Direttore di Diversità di MassDEP ai numeri di telefono elencati di seguito.

**18 Język Polski (Polish):**

Dokument ten jest ważny i powinien zostać natychmiast przetłumaczony. Jeśli potrzebujesz przetłumaczonej wersji dokumentu, prosimy o kontakt z dyrektorem ds. różnorodności MassDEP pod jednym z numerów telefonu wymienionych poniżej.

**19 हिन्दी (Hindi):**

यह दस्तावेज़ महत्वपूर्ण है और तुरंत अनुवाद किया जाना चाहिए. यदि आपको इस दस्तावेज़ का अनुवाद करने की आवश्यकता है, तो कृपया नीचे सूचीबद्ध टेलीफोन नंबरों पर मासडेप्स डाइवर्सिटी के निदेशक से संपर्क करें।.