

**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  
219 Townsend Road  
West Groton, MA 01472

to receiving water named

Squannacook River  
Nashua River Watershed

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

1. This permit shall become effective on September 1, 2021.
2. This permit shall expire five years after the effective date.
3. This permit supersedes the permit issued on March 31, 2011.
4. 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 II., Standard Conditions, as set forth in the 2021 draft NPDES Permit No. MA0004561, issued by the United States Environmental Protection Agency (EPA), Region 1, issued to Hollingsworth & Vose Company on June 30, 2021 (the 2021 NPDES Permit) and attached hereto as Appendix A; and available on EPA's website at <https://www.epa.gov/npdes-permits/massachusetts-final-individual-npdes-permits>; 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](mailto: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 4.a. and 4.c. above shall be provided as follows:

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

5. This permit incorporates by reference the Standard Permit Conditions set forth in 314 CMR 3.19.
6. This permit includes the following additional conditions:
  - a. Within six (6) months of the effective date of the 2021 Federal NPDES permit, the permittee shall submit to MassDEP an evaluation of whether the facility uses or stores any products containing any per- and polyfluoroalkyl substances (PFAS) and whether use or storage of those products can be reduced or eliminated. The analysis shall be submitted electronically to [massdep.npdes@mass.gov](mailto:massdep.npdes@mass.gov).
  - b. Beginning 180 days after the effective date of the 2021 Federal NPDES Permit, the permittee shall commence monitoring of the effluent and sludge for PFAS compounds as detailed in the tables below. Sampling of the intake water shall be conducted concurrently with sampling of the effluent and sludge. If any of the six (6) PFAS compounds are detected in the effluent and/or sludge, the permittee shall analyze the intake water sample for all six (6) PFAS compounds. The permittee shall contact MassDEP ([massdep.npdes@mass.gov](mailto:massdep.npdes@mass.gov)) 90 days prior to starting monitoring for guidance on the appropriate analytical method. The permittee shall use EPA's multi-lab validated method for wastewater once notified by EPA that the method is available. Notwithstanding any other provision of the 2021 Federal NPDES permit to the contrary, monitoring results shall be reported to MassDEP electronically at [massdep.npdes@mass.gov](mailto:massdep.npdes@mass.gov), or as otherwise specified, within 30 days after they are received.

**Effluent (Outfall 001)**

Parameter	Units	Measurement Frequency	Sample Type
Perfluorohexanesulfonic acid (PFHxS)	ng/L	Quarterly <sup>1</sup>	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

**Sludge**

Parameter	Units	Measurement Frequency	Sample Type
Perfluorohexanesulfonic acid (PFHxS)	ng/g	Quarterly	Grab
Perfluoroheptanoic acid (PFHpA)	ng/g	Quarterly	Grab
Perfluorononanoic acid (PFNA)	ng/g	Quarterly	Grab
Perfluorooctanesulfonic acid (PFOS)	ng/g	Quarterly	Grab
Perfluorooctanoic acid (PFOA)	ng/g	Quarterly	Grab
Perfluorodecanoic acid (PFDA)	ng/g	Quarterly	Grab

- c. After completing one year of intake water and effluent monitoring for PFAS on the timeline specified by the 2021 Federal NPDES permit for effluent PFAS monitoring, if the permittee sufficiently demonstrates that the detected PFAS compounds in the effluent are from the intake water from the Squannacook River and not from the H&V facility, the permittee may

<sup>1</sup> 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).

- 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 request shall be made in writing and sent to [massdep.npdes@mass.gov](mailto:massdep.npdes@mass.gov). The permittee shall continue such monitoring pending written approval from MassDEP to discontinue it.
- d. After completing one year of monitoring, if four (4) consecutive samples of the sludge are reported as non-detect for all six PFAS compounds, then the permittee may submit a request to discontinue PFAS monitoring for the sludge, as applicable. Any such requests shall be made in writing and sent to: [massdep.npdes@mass.gov](mailto:massdep.npdes@mass.gov). The permittee shall continue such monitoring pending written approval from MassDEP to discontinue it.

Signed this 2<sup>nd</sup> day of August, 2021

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

**RESPONSE TO COMMENTS**

**MA Permit No. MA0004561  
Hollingsworth & Vose Company  
219 Townsend Road, West Groton, MA 01472**

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 West Groton, 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. MA0004561 (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 April 1, 2021 through April 30, 2021, MassDEP solicited public comments on the Draft Permit for the reissuance of a permit to discharge treated stormwater, treated laboratory process water, and treated paper production process water, consisting of backwash water from multimedia filters, wash water from pulpers, blowdown condensate from boilers, and excess water from paper machines save-alls from Outfall Serial Number 001 to the Squannacook River and the associated Draft WQC.

During the public comment period for the draft NPDES permit (April 1, 2021 through April 30, 2021), EPA received comments from:

1. Hollingsworth & Vose Company on April 30, 2021.

EPA’s Response to Comments is included as part of the final NPDES permit issuance. During the public comment period for the draft SWD Permit, MassDEP received comments from:

1. Hollingsworth & Vose Company on April 30, 2021.

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 – 5<sup>th</sup> Floor, Boston 02108; telephone: 617-654-6517; email: [xiaodan.ruan@mass.gov](mailto:xiaodan.ruan@mass.gov). MassDEP is currently 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 6.b. in the Final State Permit has been revised by adding a condition about PFAS sampling, "Sampling of the intake water shall be conducted concurrently with sampling of the effluent and sludge. If any of the six (6) PFAS compounds are detected in the effluent and/or sludge, the permittee shall analyze the intake water sample for all six (6) PFAS compounds."
2. Paragraph 6.c. in the Final State Permit has been added to include a condition to allow the Permittee to request modification for PFAS monitoring for the effluent and the intake water.
3. Paragraph 6.d. in the Final State Permit has been added to include a condition to allow the Permittee to request modification for PFAS monitoring for the sludge.

## **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 April 30, 2020.**

#### **Comment 1**

Permit Condition 6.b. and Certification Condition 1.b.

Intake water to the H&V facility is withdrawn from the Squannacook River. H&V is concerned that the ubiquitous presence of per- and polyfluoroalkyl substances (PFAS) in the environment (in this case, the intake water from the river) may cause detections of PFAS in the effluent and/or sludge.

If PFAS compounds are detected in the effluent and/or sludge, in order to demonstrate that the intake water could be the source of PFAS compounds, H&V proposes to conduct sampling of the intake water when effluent and sludge sampling is conducted. The effluent and sludge samples shall be analyzed for PFAS compounds, and if any PFAS compounds are detected in either type of sample, then the intake water sample shall also be analyzed. If no PFAS

compounds are detected in the effluent and/or sludge, then analysis of the intake water is not required. H&V proposes the following additional wording as the second and third sentences of Condition 6.b. in the draft permit and of Condition 1.b. in the draft certification:

*Sampling of the intake water shall be conducted concurrently with sampling of the effluent and sludge. If any of the six (6) PFAS compounds are detected in the effluent and/or sludge, the permittee will analyze the intake water sample for all six (6) PFAS compounds.*

Please note that this wording is similar to language in the recently-issued permit for H&V's East Walpole facility (MA Permit No. MA0044996).

### **Response 1**

MassDEP grants the request H&V proposed to sample the intake water to demonstrate the intake water could be the source of PFAS compounds. Paragraph 6.b. has been amended to include: "Sampling of the intake water shall be conducted concurrently with sampling of the effluent and sludge. If any of the six (6) PFAS compounds are detected in the effluent and/or sludge, the Permittee shall analyze the intake water sample for all six (6) PFAS compounds."

### **Comment 2**

Permit Condition 6. and Certification Condition 1.

The draft permit does not contain language that allows for H&V to discontinue PFAS monitoring if PFAS compounds are not detected in four (4) consecutive sampling events for the effluent and/or sludge, or when analysis of the intake water from the river demonstrates that the river water is the source of PFAS compounds. Therefore, H&V proposes the addition of the following paragraph as Condition 6.c in the draft permit and Condition 1.c. in the draft certification:

*After completing one year of monitoring, if four (4) consecutive samples of the effluent are reported as non-detect for all six PFAS compounds, or four (4) consecutive samples of the sludge are reported as non-detect for all six PFAS compounds, then the permittee may submit a request to discontinue PFAS monitoring, as applicable. After completing one year of monitoring, if the permittee sufficiently demonstrates that the detected PFAS compounds in the effluent and/or sludge are from the intake water from the Squannacook River and not from the H&V facility, the permittee may submit a request to MassDEP to modify the effluent, sludge, 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](mailto:massdep.npdes@mass.gov). The permittee shall continue such monitoring pending written approval from MassDEP to discontinue it.*

Please note that this wording is similar to language in the recently-issued permit for H&V's East Walpole facility.

**Response 2**

See Response to Comment 1. The draft permit did not contain language that allows for H&V to discontinue effluent monitoring if PFAS compounds are not detected in four (4) consecutive sampling events because this condition was already included in the draft NPDES permit and MassDEP incorporated the draft NPDES permit condition by reference. As the final NPDES permit also includes this condition, MassDEP is not separately including it in the Final State Permit, as it is incorporated by reference.

MassDEP agrees that if the Permittee sufficiently demonstrates that the detected PFAS compounds in the effluent are from the intake water from the Squannacook River and not from the facility, the Permittee may submit a request to MassDEP to modify the effluent and intake water monitoring requirements. MassDEP agrees with EPA's response (See EPA's Response to Comment 2) to the same comment that there could be a scenario where the PFAS in the intake water is concentrated during the manufacturing and treatment processes, and the concentrations are toxic to humans, aquatic life, or wildlife. MassDEP will make a determination based on the review and evaluation of the monitoring data. Paragraphs 6.c. has been added in the Final State Permit to reflect the addition of the condition.

Paragraph 6.d. has been added in the Final State Permit in regards to the discontinuation of sludge sampling.



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।