

FINAL
Clean Water Act Section 401 Certification
For the Proposed 2021 Federal NPDES Permit
For the Pittsfield Wastewater Treatment Plant
MA Permit No. MA0101681

The Massachusetts Department of Environmental Protection (MassDEP), having examined the City of Pittsfield's National Pollutant Discharge Elimination System (NPDES) permit application for the Pittsfield Wastewater Treatment Plant, reviewed the United States Environmental Protection Agency (EPA) – Region 1's draft 2021 Federal NPDES permit (MA Permit No. MA0101681) for the Pittsfield Wastewater Treatment Plant issued March 23, 2021, and considered the public comments received on MassDEP's proposed Clean Water Section 401 Certification for the draft 2021 Federal NPDES Permit for the Pittsfield Wastewater Treatment Plant, and in consideration of the relevant water quality considerations, hereby certifies:

1. that the following conditions, together with the terms and conditions contained in the proposed 2021 Federal NPDES permit for the Pittsfield Wastewater Treatment Plant, are necessary to assure compliance with the applicable provisions of the Federal Clean Water Act Sections 208(e), 301, 302, 303, 306, and 307 and with appropriate requirements of State law, including, without limitation, the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26-53 and the Massachusetts Water Quality Standards published at 314 CMR 4.00:
 - a. Pursuant to 314 CMR 3.11 (2)(a)6., and in accordance with MassDEP's obligation under 314 CMR 4.05(5)(e) to maintain surface waters free from pollutants in concentrations or combinations that are toxic to humans, aquatic life, or wildlife, beginning six (6) months after the permittee has been notified by EPA of a multi-lab validated method for wastewater, or two (2) years after the effective date of the 2021 Federal NPDES permit, whichever is earlier, the permittee shall conduct monitoring of the influent, effluent, and sludge for PFAS compounds as detailed in the tables below. If EPA's multi-lab validated method is not available by twenty (20) months after the effective date of the 2021 Federal 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, at massdep.npdes@mass.gov, or as otherwise specified, within 30 days after they are received.

Influent and Effluent (Outfall 003)

| Parameter | Units | Measurement Frequency | Sample Type |
|--------------------------------------|-------|------------------------|-------------------|
| Perfluorohexanesulfonic acid (PFHxS) | ng/L | Quarterly ¹ | 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 |

¹ 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).

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 |

- b. Pursuant to 314 CMR 3.11 (2)(a)6., and in accordance with MassDEP's obligation under 314 CMR 4.05(5)(e) to maintain surface waters free from pollutants in concentrations or combinations that are toxic to humans, aquatic life, or wildlife, Beginning six (6) months after permittee has been notified by EPA of a multi-lab validated method for wastewater, or two (2) years after the effective date of the 2021 Federal NPDES permit, whichever is earlier, the permittee shall commence annual monitoring of all Significant Industrial Users^{2,3} discharging into the POTW. Monitoring shall be in accordance with the table below. If EPA's multi-lab validated method is not available by twenty (20) months after the effective date of the 2021 Federal 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 at massdep.npdes@mass.gov within 30 days after they are received.

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

2. that there is a reasonable assurance that the activity will be conducted in a manner which will not violate applicable state water quality standards.

To meet the requirements of Massachusetts laws, each of the conditions cited in the draft permit and this certification shall not be made less stringent unless new data or other information is presented and

² Significant Industrial User (SIU) is defined at 40 CFR part 403: All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR chapter I, subpart N; **and** any other industrial user that: discharges an average of 25,000 GPD or more of process wastewater to the POTW, contributes a process wastestream that makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW, or designated as such by the POTW on the basis that the industrial users has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standards or requirement.

³ This requirement applies to all Significant Industrial Users and not just those within the sectors identified by EPA in the NPDES permit.

MassDEP determines modification of this certification is appropriate in consideration of the relevant water quality considerations.

If any condition in the draft 2021 Federal NPDES permit for the Pittsfield Wastewater Treatment Plant is changed during EPA's review in any manner inconsistent with this certification, the Department reserves the right to modify this certification in consideration of the relevant water quality considerations. In addition, the Department reserves the right to modify this certification if there is a change in Massachusetts law or regulation upon which this certification is based, or if a court of competent jurisdiction or MassDEP Office of Appeals and Dispute Resolution stays, vacates or remands this certification, as provided by 40 C.F.R. § 124.55.

Signed this 20th day of May, 2021

A handwritten signature in black ink, appearing to read 'Lealdon Langley', written over a horizontal line.

Lealdon Langley, Director
Massachusetts Department of Environmental Protection
Bureau of Water Resources
Division of Watershed Management