

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,

Westborough Treatment Plant Board

is authorized to discharge from the facility located at

Westborough Wastewater Treatment Plant
238 Turnpike Road
Westborough, MA 01581

to receiving water named

Assabet River
SuAsCo Watershed

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

1. This permit shall become effective on May 1, 2022.
2. This permit shall expire five years after the effective date.
3. This permit supersedes the permit issued on May 26, 2005.
4. This permit incorporates by reference Part IA., Effluent Limitations and Monitoring Requirements, Part IB., Unauthorized Discharges, Part IC., Operation and Maintenance of the Sewer System, Part ID. Alternate Power Source, Part IE. Industrial Users and Pretreatment Program, Part IF. Sludge Conditions, Part IG. Special Conditions, Part IH. Reporting Requirements, and Part II, Standard Conditions, as set forth in the 2022 final NPDES Permit No. MA0100498, issued by the United States Environmental Protection Agency (EPA), Region 1, issued to the Westborough Treatment Plant Board on February 8, 2022 (the 2022 Final NPDES Permit) and attached hereto by reference 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 a copy of the requests, reports, and information required by Part IH.4. to be submitted to EPA shall also be submitted to MassDEP electronically to massdep.npdes@mass.gov;
 - d. 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;
 - e. that the notification required by 4.a. 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

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. Beginning 180 days after the effective date of the permit, the permittee shall commence monitoring of the influent, effluent, and sludge for PFAS compounds as detailed in the tables below. The permittee shall contact MassDEP (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 2022 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 001)

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

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. Beginning 1 year after the effective date of the permit, the permittee shall commence annual PFAS monitoring of all Significant Industrial Users^{2,3} discharging into the POTW. Monitoring shall be in accordance with the table below. The permittee shall contact MassDEP (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 2022 Federal NPDES permit to the contrary, monitoring results

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).

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.

shall be reported to MassDEP electronically at massdep.npdes@mass.gov, or as otherwise specified, 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

The Towns of Westborough, Shrewsbury, and Hopkinton are co-permittees for Part IB., Unauthorized Discharges; and Part IC., Operation and Maintenance, as set forth in the 2022 final NPDES Permit. These sections include conditions regarding the operation and maintenance of the collection systems owned and operated by the Town.

Operation and maintenance of the sewer system shall be in compliance with the General Requirements of Part II and the terms and conditions of Part IB., Part IC., and Part ID. of the 2021 draft NPDES permit. The Permittee and co-permittee are severally liable under Part IB., Part IC., and Part ID. for their own activities and required reporting with respect to the portions of the collection system that they own or operate. They are not liable for violations of Part IB., Part IC., and Part ID. committed by others relative to the portions of the collection system owned and operated by others. Nor are they responsible for any reporting that is required of other Permittees under Part IB., Part IC., and Part ID. The responsible Town departments are:

Town of Westborough
Department of Public Works
131 Oak Street
Westborough, MA 01581

Town of Shrewsbury
Department of Public Works
100 Maple Avenue
2nd Floor
Shrewsbury, MA 01545

Town of Hopkinton
Department of Public Works
83 Wood Street
Hopkinton, MA 01748

Signed this 1st day of April, 2022



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

RESPONSE TO COMMENTS

**MA Permit No. MA0100412
Westborough Wastewater Treatment Plant
238 Turnpike Road
Westborough, MA 01581**

The Massachusetts Department of Environmental Protection (MassDEP or the “Department”) is issuing a Surface Water Discharge (SWD) Permit to the Westborough Treatment Plant Board (the Permittee) for the Westborough Wastewater Treatment Plant (the Facility) located at 238 Turnpike Road, Westborough, 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. MA0100412 (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 September 16, 2020 through October 16, 2020, MassDEP solicited public comments on the Draft Permit for the (re)issuance of a permit to discharge treated effluent from Outfall Serial Number(s) 001 to the Assabet River and the associated Draft WQC.

During the public comment period for the draft NPDES permit (September 16, 2020 through October 16, 2020 and extended to November 9, 2020), EPA received comments from:

1. Michael Stanton, Chairman, Westborough Treatment Plant Board, dated October 6, 2020
2. Jeffrey Howland, Director of Public Works, Town of Shrewsbury, dated November 9, 2020
3. John K. Westerling, Director of Public Works, Town of Hopkinton, dated November 9, 2020
4. Alison Field-Juma, Executive Director, Organization for the Assabet, Sudbury, and Concord Rivers, dated October 9, 2020
5. Jennifer A. Pederson, Executive Director, Massachusetts Water Works Association, dated October 9, 2020
6. Philip D. Guerin, President & Chairman, Massachusetts Coalition for Water Resources Stewardship, dated October 9, 2020

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

1. Michael Stanton, Chairman, Westborough Treatment Plant Board, dated October 6, 2020
2. Jeffrey Howland, Director of Public Works, Town of Shrewsbury, dated November 9, 2020
3. Alison Field-Juma, Executive Director, Organization for the Assabet, Sudbury, and Concord Rivers, dated October 16, 2020

The comments MassDEP received included all comments EPA received, with several comments specifically for MassDEP.

MassDEP has reviewed EPA's Response to Comments issued concurrent with the final NPDES permit on October 25, 2021, and concurs with their responses and the associated adjustments made to the final NPDES permit. MassDEP hereby incorporates by reference EPA's Response to Comments into this Response.

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.

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 Jennifer Wood, MassDEP, Surface Water Discharge Permitting Program, 1 Winter Street, Boston, MA 02108; telephone: 617-835-9886; email: jennifer.wood@mass.gov. MassDEP strongly encourages that interested parties email Jennifer Wood if they wish to obtain a copy of the Final Permit.

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I. Summary of Changes to the Final Permit

1. Paragraphs 6.a. and 6.b. have been revised to be consistent with EPA NPDES Permit requirements related to PFAS to note that EPA will notify the permittee when EPA's multi-lab validated method for wastewater is available.
2. Paragraph 6.a. has been revised to clarify how permittees will report results to MassDEP prior to EPA's monitoring requirement going into effect.
3. Paragraph 6.b. has been revised to include a definition for Significant Industrial Users.
4. Paragraph 6.b. has been revised to clarify that results shall be reported through email, or otherwise specified, if MassDEP directs permittees to report through another mechanism.