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,

Town of Winchendon 109 Front Street Winchendon, Massachusetts 01475

is authorized to discharge from the facility located at

Winchendon Water Pollution Control Facility (WPCF) 637 River Street Winchendon, Massachusetts 01475

to receiving water named

Millers River Millers River Watershed

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

- 1. This permit shall become effective on December 1, 2021.
- 2. This permit shall expire five years after the effective date.
- 3. This permit supersedes the permit issued on February 25, 2011.
- 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, Part IF. Sludge Conditions, Part IG. Special Conditions, Part IH. Reporting Requirements, and Part II, Standard Conditions, as set forth in the 2021 draft NPDES Permit No. MA0100862, issued by the United States Environmental Protection Agency (EPA), Region 1, issued to the Town of Winchendon on June 4, 2021 (the 2021 Draft NPDES Permit) and attached hereto by reference as Appendix A and available on EPA's website at https://www.epa.gov/npdes-permits/massachusetts-draft-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;
 - 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 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 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 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 commence annual

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).

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, 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

Signed this 1st day of November, 2021

Lealdon Langley, Director

Division of Watershed Management

Department of Environmental Protection

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.

RESPONSE TO COMMENTS

MA Permit No. MA0100862 Town of Winchendon

Winchendon Water Pollution Control Facility, 637 River Street, Winchendon, Massachusetts

The Massachusetts Department of Environmental Protection (MassDEP or the "Department") is issuing a Surface Water Discharge (SWD) Permit to the Town of Winchendon (the Permittee) for the facility (the Facility) located in Winchendon, 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. MA0100862 (the "Draft Permit") and the draft Water Quality Certificate (the "Draft WQC"). The Response to Comments explains and supports MassDEP's determinations that form the basis of the final permit (the "Final Permit") and the final WQC. From June 4, 2021 through July 6, 2021, MassDEP solicited public comments on the Draft Permit for the reissuance of a permit to discharge treated wastewater from Outfall Serial Number 001 to the Millers River and the associated Draft WQC.

Please note that the Draft Permit contained a typographical error related to the address of the Facility. The address has been corrected in this Final Permit.

During the public comment period for the draft NPDES permit June 4, 2021 through July 6, 2021), EPA received comments from:

- 1. Brian Croteau, Director of Public Works, Department of Public Works, Town of Winchendon, submitted July 6, 2021
- 2. Jennifer L. Perry, Director, Water Planning and Management Division, Connecticut Department of Energy and Environmental Protection, submitted June 24, 2021

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

3. Brian Croteau, Director of Public Works, Department of Public Works, Town of Winchendon, submitted July 7, 2021

These comments were received after the close of the public comment period. However, since the comments were identical to those submitted to EPA, MassDEP has reviewed EPA's Response to Comments, issued concurrent with the final NPDES permit on September 14, 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 and is not adding any additional responses on the comments received.

Consistent with EPA's determination, 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 or WQC that warranted MassDEP exercising the discretion to reopen the public comment period.

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

A copy of the Final Permit and WQC may be also obtained by writing or calling Claire Golden, MassDEP, Surface Water Discharge Permitting Program, 205 B Lowell Street, Wilmington, MA 01887; telephone: 617-997-8874; email: claire.golden@mass.gov. MassDEP is working remotely. As such, interested parties are strongly encouraged to email or call Claire Golden if they wish to obtain a copy of the Final Permit or WQC.