

*For Office Use Only*  
 Executive Office of Environmental Affairs  
 EOEA No.: 12966  
 MEPA Analyst: ANDREA DAMES  
 Phone: 617-626-1028

# ENF Environmental Notification Form

The information requested on this form must be completed to begin MEPA Review in accordance with the provisions of the Massachusetts Environmental Policy Act, 301 CMR 11.00.

Project Name: Proposed Revisions to the Massachusetts Water Resources Authority's Local Discharge Limits for the Boston Metropolitan Sewerage Service Area		
Street: N/A		
Municipality: 43 Communities in Eastern Mass.	Watershed: N/A	
Universal Transverse Mercator Coordinates:	Latitude: See Attached Map Longitude:	
Estimated commencement date: N/A	Estimated completion date: N/A	
Approximate cost: N/A	Status of project design: N/A %complete	
Proponent: Massachusetts Water Resources Authority		
Street: 2 Griffin Way		
Municipality: Chelsea	State: MA	Zip Code: 02150
Name of Contact Person From Whom Copies of this ENF May Be Obtained: Denise K. Breiteneicher		
Firm/Agency: Massachusetts Water Resources Authority	Street: 2 Griffin Way	
Municipality: Chelsea	State: MA	Zip Code: 02150
Phone: 617-305-5618	Fax: 617-371-1604	E-mail: Denise.Breiteneicher@mwra.state.ma.us

- Does this project meet or exceed a mandatory EIR threshold (see 301 CMR 11.03)?  
 Yes  No
- Has this project been filed with MEPA before?  
 Yes (EOEA No. \_\_\_\_\_)  No
- Has any project on this site been filed with MEPA before?  
 Yes (EOEA No. \_\_\_\_\_)  No
- Is this an Expanded ENF (see 301 CMR 11.05(7)) requesting:
- a Single EIR? (see 301 CMR 11.06(8))  Yes  No
  - a Special Review Procedure? (see 301 CMR 11.09)  Yes  No
  - a Waiver of mandatory EIR? (see 301 CMR 11.11)  Yes  No
  - a Phase I Waiver? (see 301 CMR 11.11)  Yes  No

Identify any financial assistance or land transfer from an agency of the Commonwealth, including the agency name and the amount of funding or land area (in acres): N/A

Are you requesting coordinated review with any other federal, state, regional, or local agency?  
 Yes (Specify \_\_\_\_\_)  No

List Local or Federal Permits and Approvals: EPA approved the proposed changes to MWRA's Local Discharge Limits on October 9, 2002. Deer Island Treatment Plant's NPDES Permit number is MA0103284.

Which ENF or EIR review threshold(s) does the project meet or exceed (see 301 CMR 11.03):

- |                                 |                                       |  |
|---------------------------------|---------------------------------------|--|
| <input type="checkbox"/> Land   | <input type="checkbox"/> Rare Species | <input type="checkbox"/> Wetlands, Waterways, & Tidelands      |
| <input type="checkbox"/> Water  | <input type="checkbox"/> Wastewater   | <input type="checkbox"/> Transportation                        |
| <input type="checkbox"/> Energy | <input type="checkbox"/> Air          | <input type="checkbox"/> Solid & Hazardous Waste               |
| <input type="checkbox"/> ACEC   | <input type="checkbox"/> Regulations  | <input type="checkbox"/> Historical & Archaeological Resources |

Summary of Project Size & Environmental Impacts	Existing	Change	Total	State Permits & Approvals
<b>LAND</b>				<input type="checkbox"/> Order of Conditions <input type="checkbox"/> Superseding Order of Conditions <input type="checkbox"/> Chapter 91 License <input type="checkbox"/> 401 Water Quality Certification <input type="checkbox"/> MHD or MDC Access Permit <input type="checkbox"/> Water Management Act Permit <input type="checkbox"/> New Source Approval <input type="checkbox"/> DEP or MWRA Sewer Connection/ Extension Permit <input type="checkbox"/> Other Permits <i>(including Legislative Approvals) – Specify:</i> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/> <hr/>
Total site acreage	N/A			
New acres of land altered		N/A		
Acres of impervious area	N/A	N/A	N/A	
Square feet of new bordering vegetated wetlands alteration		N/A		
Square feet of new other wetland alteration		N/A		
Acres of new non-water dependent use of tidelands or waterways		N/A		
<b>STRUCTURES</b>				
Gross square footage	N/A	N/A	N/A	
Number of housing units	N/A	N/A	N/A	
Maximum height (in feet)	N/A	N/A	N/A	
<b>TRANSPORTATION</b>				
Vehicle trips per day	N/A	N/A	N/A	
Parking spaces	N/A	N/A	N/A	
<b>WATER/WASTEWATER</b>				
Gallons/day (GPD) of water use	N/A	N/A	N/A	
GPD water withdrawal	N/A	N/A	N/A	
GPD wastewater generation/ treatment	N/A	N/A	N/A	
Length of water/sewer mains (in miles)	N/A	N/A	N/A	

**CONSERVATION LAND:** Will the project involve the conversion of public parkland or other Article 97 public natural resources to any purpose not in accordance with Article 97?

- Yes (Specify \_\_\_\_\_)  No

Will it involve the release of any conservation restriction, preservation restriction, agricultural preservation restriction, or watershed preservation restriction?

Yes (Specify \_\_\_\_\_ )  No

**RARE SPECIES:** Does the project site include Estimated Habitat of Rare Species, Vernal Pools, Priority Sites of Rare Species, or Exemplary Natural Communities?

Yes (Specify \_\_\_\_\_ )  No

**HISTORICAL /ARCHAEOLOGICAL RESOURCES:** Does the project site include any structure, site or district listed in the State Register of Historic Place or the inventory of Historic and Archaeological Assets of the Commonwealth?

Yes (Specify \_\_\_\_\_ )  No

If yes, does the project involve any demolition or destruction of any listed or inventoried historic or archaeological resources?

Yes (Specify \_\_\_\_\_ )  No

**AREAS OF CRITICAL ENVIRONMENTAL CONCERN:** Is the project in or adjacent to an Area of Critical Environmental Concern?

Yes (Specify \_\_\_\_\_ )  No

**PROJECT DESCRIPTION:** The project description should include (a) a description of the project site, (b) a description of both on-site and off-site alternatives and the impacts associated with each alternative, and (c) potential on-site and off-site mitigation measures for each alternative (You may attach one additional page, if necessary.)

The Massachusetts Water Resources Authority is required by the EPA through its Pretreatment Regulations, 40 CFR Part 403, and MWRA's NPDES Permit, to conduct a periodic analysis of the discharge limits applicable to permitted discharges to MWRA's Sewer System. Under this requirement, MWRA must review the adequacy of existing discharge limits and establish additional standards, if necessary, to prevent pollutants from entering the treatment system that would interfere with the operation of the treatment plant, degrade the quality of biosolids (fertilizer pellets), affect worker health and safety, or pass untreated through the treatment plant to violate water quality standards. MWRA may also review the necessity of each standard and its impact on industries and propose to increase a standard if the increased limit will not result in any adverse impact to the treatment plant, worker health and safety, pellet quality, or the receiving water. Industrial flow accounts for 4% of the total flow to the Deer Island Treatment Plant.

The local limits analysis indicates that most of the existing local limits are not a candidate for revisions; these limits adequately protect the treatment system and are not unreasonably burdensome on the regulated community. There are, however, seventeen parameters for which changes are proposed. Eight limits are proposed to become more stringent<sup>1</sup>, eight additional limits are proposed to be made less stringent, and one limit is being replaced by another set of limits. For the purposes of this ENF, only the eight limits proposed to be made less stringent and the one limit proposed to be replaced by other requirements will be discussed in depth pursuant to 301 CMR 11.03 (12). This section of the EOE regulations states that an ENF is required if "Promulgations of New or revised regulations, of which a primary purpose is protecting against Damage to the Environment, that significantly reduce: 1. standards for environmental protection;...". Based on the analysis conducted by the MWRA on the discharge limits, we do not believe that these changes significantly reduce standards for environmental

<sup>1</sup> The eight limits proposed to become more stringent are benzene, copper, fluoranthene, hexachlorobutadiene, pentachlorophenol, vinyl chloride, vinylidene chloride, dichlorodifluoromethane.

protection or have any adverse impact on the environment at all. More information on the entire local limits analysis may be reviewed in the Final Report for MWRA Local Limits Development available at the MEPA office or at MWRA's offices at 2 Griffin Way in Chelsea.

The local discharge limits analysis involves an evaluation of the performance of the treatment plant, the NPDES Permit requirements, the characteristics of the receiving water, and worker health and safety. Conducting a periodic review of the local limits enables MWRA to establish standards and control measures that reflect changes in the particular characteristics of MWRA's system, including:

- Type and amount of industrial discharge
- Existing quality of receiving water
- Sludge quality
- Pollutant loadings from sources other than permitted industries
- Treatment plant performance
- Changing regulations

The most significant change in the wastewater system since the last local limits analysis was performed in 1991-1992 has been the completion and operation of the new Deer Island Wastewater Treatment Plant. Particularly with the provision of secondary treatment, pollution removal rates at the Deer Island Treatment Plant have increased dramatically. Under current conditions, the federal and state limits on metals in the fertilizer pellets intended for beneficial re-use are the most important factors driving the setting of local limits on industrial dischargers.

The tables below list the limits that may be relaxed or eliminated and the limit that is being replaced by other limits and requirements. Table 1 lists the limits that may be relaxed or eliminated, and Table 2 lists the limits that are being replaced by other limits. More detail on these changes is provided in Attachment A.

**Table 1: Limits Proposed for Increases or Elimination**

Parameter	Existing Limit (mg/l)	Proposed Action
Acrolein	Prohibited	Raise to 0.15 mg/l
Boron	20.0	Eliminate boron limit
Chlorinated Naphthalenes	0.8	Move to TTO list – revised limit will be 1.0 mg/l
Formaldehyde	1.0 (TTO) <sup>2</sup>	Raise to 9.0 mg/l
pH	5.5-10.5 standard units	Raise upper limit to 12.0
Phenanthrene	Prohibited	Move to TTO list – revised limits will be 1.0 mg/l
Phenolic Compounds	0.5	Move onto TTO list – revised limit will be 1.0 mg/l
Trichloroethylene	0.07	Move onto TTO list – revised limit will be 1.0 mg/l

<sup>2</sup> TTO means that the substance is one of the Total Toxic Organics; 100 organic pollutants that are regulated in the MWRA Sewer Use Regulations as a group. Any individual organic on the TTO list cannot exceed 1 mg/l and the combination of any organics on the list cannot exceed 5 mg/l.