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Massachusetts Department of Environmental Protection
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RE: Comments on Logan Airport Draft NPDES Permit No. MA0000787

To Whom it May Concern:

The Mystic River Watershed Association (MyRWA), a nonprofit advocacy organization dedicated to the sustainable management and wise use of the Mystic River Watershed, including Boston Harbor and Winthrop Bay, welcomes this opportunity to file comments regarding the above-referenced draft National Pollutant Discharge Elimination System (NPDES) permits to be issued under sections 301 and 402 of the United States Clean Water Act as amended and under sections 27 and 43 of the Massachusetts Clean Waters Act, as amended.

MyRWA would first like to register its support for the general improvements made to the draft permit including new numeric limits on bacteria, DO monitoring for all outfalls that receive deicing discharges, and more frequent WET testing.

MyRWA considers this permit particularly important due to the impaired state of Boston Harbor and Winthrop Bay, to the large size of the facility and the numerous outfalls, and to the fact that several of the bordering communities are environmental justice communities. The pollution reduction that will be derived from the permit conditions is so important to protecting the health of the communities and the health of the environment. We respectfully request that EPA prioritize the review of the data for the facility and draft a new the permit for this facility at the 5-year expiration date and not administratively continue the permit or delay the draft. The last permit for this facility was issued in 2007, nearly 3 times the length of time of the original permit. This delay decreases the frequency of amending the permit conditions to more rapidly decrease the sources of pollution to these impaired waterways.

MassDEP and USEPA should prioritize the review and renewal of NPDES permits that are in areas adjacent to environmental justice populations.

MyRWA requests that EPA consider the following recommendations to further improve the efficacy of the NPDES permit under review:

1. **Set Effluent Limits for Fecal Coliform for all outfalls.** Fecal Coliform limits are important to reduce effluent bacterial levels to safeguard the environment and human health and comply with the existing TMDL. Although Effluent Limits are set for 01A, no Limits are set for outfalls 02A, 03A, and 04A because there are no shellfishing areas nearby. However, bacteria sampling over the prior permit term clearly illustrates numerous exceedances of the applicable water

quality standards and high levels of Fecal Coliform. Therefore, we request that EPA set the same Fecal Coliform Limits for these outfalls as for the other outfalls in the permit. Additionally, the permit should require that the outfalls with Fecal Coliform exceedences should be investigated and solutions implemented within the next three years of the permit.

2. **Increase the duration of PFAS sampling.** We commend the EPA for requiring testing for PFAS because of their potential for harm and their long persistence in the environment. However, we request that EPA require a higher number of sampling events, e.g. 8 events, with a non-detect result before removing the requirement for PFAS monitoring. In addition, if any PFAS are detected, we ask that the sampling frequency be increased to provide sufficient data to set limits in the next permit.

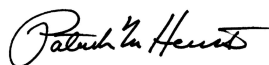
3. **Require Permittee to implement additional pollution control measures at outfall 03A to eliminate TSS exceedances.** TSS levels at Outfall 003 have exceeded 100 mg/L on multiple occasions in both wet and dry conditions during the 5 year period from April 2015 to April 2020. It is important to note that the monitoring locations of Outfall 003 are representative of the contribution of the Permittee and excludes any contribution from East Boston stormwater. The data clearly demonstrate that the maximum daily TSS limit of 100 mg/L *cannot* be achieved with the existing BMPs without additional technology or process changes. We request that the Draft Permit requires the Permittee to evaluate the selection, design, installation, and implementation of stormwater pollutant control measures and implement changes to reduce the level of TSS below the permit limit.

4. **Improved public access to the Discharge Water Quality Data, Discharge Monitoring Reports (DMRs), and Stormwater Pollution Prevention Plan (SWPPP).** Data on the chemical characteristics of effluent discharges is currently submitted by the permittee to NetDMR. This is a critical tool for regulators to access data and determine compliance. It is an important component of EJ for the surrounding communities to have access to important information to be able to meaningfully participate in the implementation and enforcement of these permits. MyRWA requests that as a requirement of the permit, the Permittee will annually release a narrative and data description of the water quality data collected that year. This document will provide an explanation on exceedances and missing data.

MyRWA requests that the SWPPP be submitted to EPA for approval, be made available electronically upon request, and that the DMRs also be made available electronically upon request.

In closing, MyRWA commends EPA for robust efforts at public engagement and alternative language access for the public hearing. We appreciate this opportunity to comment.

Sincerely,



Patrick Herron
Executive Director