



August 19, 2009

Brian F. Thomas
Industrial Permits Branch
US Environmental Protection Agency
1 Congress Street, Suite 1100(CIP)
Boston, Ma 02114-2003

Dear Mr. Thomas,

The Mystic River Watershed Association (MyRWA) welcomes this opportunity to comment on the Distrigas of Massachusetts, LLC. NPDES Permit # MA0020010.

MyRWA is a nonprofit grassroots organization committed to the protection and restoration of the natural resources in the 21 communities comprising the Mystic River basin, which includes the main stem of the Mystic River (Mystic River Basin segment MA71-03) in Everett, site of Distrigas of Massachusetts, LLC. MyRWA has over 380 members, including local organizations that work to protect portions of the watershed, as well as individuals. We have a stated goal of "fishable and swimmable" waters by 2010 and a commitment to continuous improvement in the watershed. It is from this perspective that we submit the following comments.

In general, we are pleased with the diligent efforts of the permit writer to address the various issues at this site especially as the long legacy of industrial use further complicates the many already complex considerations associated with present Distrigas operations. We appreciate the efforts made to address all the concerns associated with this industrial site in a comprehensive manner.

We are also mindful of the role Distrigas of Massachusetts LLC plays as a corporate leader in the watershed and acknowledge their efforts to be a good corporate citizen. Distrigas of Massachusetts LLC has provided significant financial support to the Mystic River Watershed Association and has been a supporter of the work MyRWA undertakes. We look forward to continuing the open and frank discussions with Distrigas staff and management we have come to appreciate.

We would like to address a few specific points in the permit, however, and suggest changes that are likely to produce a reduction in contaminants and an increase in our collective knowledge of the impact of Distrigas activities on the Mystic River. They are as follows:

1. MyRWA requests that the Additional Permit Conditions for the Stormwater Pollution Prevention Plan (SWPP, Section 6.5.2) include language to have the SWPP and the Storm Drain Evaluation (Special Study) completed within 90 days of the permit being signed.
2. MyRWA requests that a public comment period be scheduled for review of the required SWPP and the included Storm Drain Evaluation soon after these documents are submitted for approval.

3. MyRWA requests that Distrigas make the results of the Storm Drain Evaluation (Special Study) available to the public, including a schedule of the proposed mitigation efforts. Furthermore, MyRWA requests Distrigas be required to hold a public hearing to allow public comment on these mitigation plans.
4. MyRWA requests that the Special Study evaluate all Contaminants of Concern outlined in the RTN 3-0308 1999 Phase II report, including but not limited to: benzene, toluene, ethyl benzene, xylenes, polycyclic aromatic hydrocarbons, total petroleum hydrocarbons, arsenic, lead and light and dense non aqueous phase liquids (LNAPLs and DNAPLs).
5. MyRWA requests that the Special Study and its approved recommendations be implemented within 2 years of the signing of the permit.
6. MyRWA requests that limits be instituted for Benzene (4 µg/l) and BTEX (100 µg/l) as these limits are the standard for petroleum storage facilities in the Boston area.

Finally, we request that EPA include language in this permit urging Distrigas of Massachusetts LLC to work with neighboring corporations and the City of Everett to produce a comprehensive drain plan of the underground infrastructure of the entire former manufactured gas plant located underneath and around the Distrigas site as these pipes were installed by private parties in the distant past and no comprehensive plan of this infrastructure exists today. Such a plan would aid all involved parties in identifying and addressing potential and actual discharges of pollutants into the Mystic River.

MyRWA would like to again thank both EPA and Distrigas of Massachusetts LLC for their continuing efforts in support of a clean and healthy Mystic River.

Sincerely,

EkOngKar Singh Khalsa, Executive Director
Mystic River Watershed Association
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