UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
Region 1
5 Post Office Square, Suite 100
BOSTON, MA 02109-3912

By Electronic Mail and Hard Copy

December 16, 2016

William J. Betters, P.G., L.S.P.
Director of Environmental Services
CDW Consultants
40 Speen Street Suite 301
Framingham, MA 01701

Re: Monitoring for NPDES Permit No. MA0003590
MBTA Commuter Rail Maintenance Facility
70 Rear 3rd Avenue, Somerville, MA 02143

Dear Mr. Betters,

The New England Regional Office of the United States Environmental Protection Agency (EPA) is continuing work on the development of a draft National Pollutant Discharge Elimination System (NPDES) Permit, No. MA0003590, for the MBTA Commuter Rail Maintenance Facility (henceforth MBTA CRMF). MBTA and Keolis are identified as joint operators of the MBTA CRMF for the purposes of the NPDES permit.

EPA is in receipt of a letter dated November 16, 2016 from CDW Consultants requesting a change in sampling location and method of determining flow for NPDES permit No. MA0003590. EPA finds that the request to change the discharge monitoring location from the downstream end of the Prison Point OWS to the downstream end of the new DMH 13.4 chamber, just prior to discharge into the outfall pipes, is acceptable, and consistent with the current permit's language on sampling (see footnote #1 of the permit). Sampling will be conducted at the approximate depth of the centerline of the outfall pipes.

However, estimating flow using precipitation data, as you propose in your November 16, 2016 letter, is not appropriate under the current permit, which states:

"Flow into (Chamber 1) and out of the oil/water separator (Chamber 4) shall be measured continuously by the MBTA/MBCR using a recording meter. Each co-permittee, with the exception of DCR, shall measure, using a *recording meter* [emphasis added], flows from the property under their control to the oil/water separator prior to commingling with flows from

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other sources. The permittees and co-permittees, with the exception of DCR, shall report the average monthly flow and the maximum daily flow."

Therefore, in order for the permittee to maintain compliance with this permit condition, a recording device must be installed. Installing three flow meters, one in each outfall pipe at the point where they connect to DMH 13.4, is recommended. The daily maximum and monthly average of the representative flow measurement (i.e. the sum of flows in all three pipes) should be reported in the DMR following installation of the equipment and until the permit is reissued. I request that you convey this information to your client and submit a plan to Undine Kipka of my staff at (617) 918-1335 in order to ensure compliance with the above referenced permit condition. If you have any questions concerning the required information requested above, please also contact Undine Kipka.

Sincerely,

Damien F. Houlihan, Chief
Industrial Permits Section
Office of Ecosystem Protection
USEPA Region I – New England

cc (by electronic copy):

Undine Kipka, EPA
Cathy Vakalopoulos, MassDEP
Joe Nerden, MassDEP
Clary Coutu, Keolis
Janis Kearney, MBTA

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