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Subject: CRC Comment on Westfield Water Pollution Control Plant, Westfields, MA, MA01085

Michele Duspiva,

I am submitting comments on the revised draft National Pollutant Discharge Elimination System (NPDES) permits for the Westfield Water Pollution Control Plant (WPCP) on behalf of the Connecticut River Conservancy (CRC), formerly the Connecticut River Watershed Council. CRC is an environmental nonprofit dedicated to protecting the entire Connecticut River valley through initiatives that support clean waters, healthy habitats and thriving communities. The Westfield WPCP discharges into the Westfield River, a direct tributary of the Connecticut River, and so is of interest to our organization. Our comments are below.

Fact sheet Table 1 – Summary of Designated Uses and Listing Status lists both primary and secondary contact recreation as “attained.” Page 419 the draft 2022 MA List of Integrated Waters¹ lists the status as “not assessed,” due to the lack of bacteria data for this segment. If the 2022 List of Integrated Waters is finalized before the issuance of the final license, the table should be updated to reflect this new attainment status. Generally, however, we find the addition of this table to the fact sheet to be quite helpful and appreciate its addition.

Nitrogen

As has been noted in recent comments on the draft Amherst and Northampton wastewater facilities, the 25% nitrogen reduction target for upstream sources does not accurately capture actual nitrogen loading, rather is based on design flow. The Westfield WPCP is required to meet a nitrogen limit of 407 lb/day and in the review period, discharged an annual average of 372 lb/day. If the WPCP were to increase nitrogen loading to its full allowance, this would represent an increase in nitrogen discharge. While CRC supports the nitrogen optimization requirements, it has been demonstrated that voluntary measures have not historically incentivized wastewater facilities in the MA portion of the watershed to adopt nitrogen removal and reduction activities.² At a minimum, EPA should consider establishing measurable benchmarks for the facility to minimize nitrogen discharge over the life of the permit to further reduce nitrogen discharge below 372 lb/day. Providing clear, numeric goals for how optimization will reduce nitrogen loading in the permit creates an actionable pathway for the facility to work towards these goals, which we believe could result in a more substantial reduction in nitrogen loading. Finally, the 2009 permit for this facility included recommendations

¹ <https://www.mass.gov/doc/draft-2022-integrated-list-of-waters-appendix-26-westfield-river-basin-assessment-and-listing-decision-summary/download>

² <https://neiwpc.org/2021/06/01/assessing-nitrogen-removal-retrofits/>



that the facility be prepared for additional nitrogen reduction requirements in the next permit cycle. We are concerned that this language is reflected fourteen years later in the draft permit fact sheet (under Future Nitrogen Limits) and suggest that benchmarks for reduction be added to the final permit.

How does EPA define “equitable considerations” when referring to criteria used to inform out of basin TN allocation tiers?

Ammonia

We note that the WPCP had four exceedances of ammonia limits ranging from 22% - 194%. Has the cause for these violations been identified and resolved? The NPDES Permit Writers’ Manual³ allows for an increase in the frequency of testing according to compliance history of the facility and that facilities with compliance issues should be required to perform more frequent monitoring. If this is an unresolved issue, we suggest an increase in ammonia monitoring for the facility.

Phosphorus

CRC supports the requirement to conduct ambient monitoring for phosphorus, however, we believe monitoring should not be limited to odd numbered years and we do not see a rationale in the fact sheet for requiring monitoring only every other year.

WET Testing & Metals

CRC notes that there were two cadmium violations in the review period as well as one copper violation. Has the cause of cadmium and copper violations been identified and addressed? We support the continued limits for aluminum, cadmium, copper and nickel. We also support the minimum of quarterly WET testing given the number of SIUs contributing to the WPCF.

We note that total aluminum testing frequency has been reduced from the 2009 permit (1/week) to this draft permit (1/month). Given the acute toxicity of aluminum to fish and the number of SIUs tied into the WPCF, we request that weekly monitoring for aluminum be carried forward into the draft permit.

Essential Fish Habitat

The Westfield River where the WPCF discharges is designated as EFH for Atlantic Salmon. Given that native population of Atlantic salmon in the Connecticut River have been extirpated and federal efforts to reintroduce the species ended in 2013, we wonder if it would instead make sense to focus EFH precautions on shortnose sturgeon, a federally endangered species identified downriver in the Connecticut River on the NOAA ESA Section 7 Mapper.⁴ This may not change the permit conditions but seems a more relevant species to consider when taking steps to protect and preserve EFH.

PFAS

CRC supports the efforts of EPA and DEP to characterize PFAS inputs to river systems. We support the quarterly influent, effluent, and sludge testing requirement. We understand that WWTPs are not yet equipped

³ <https://www.epa.gov/npdes/npdes-permit-writers-manual>

⁴ <https://noaa.maps.arcgis.com/apps/webappviewer/index.html?id=a85c0313b68b44e0927b51928271422a>



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to limit or treat PFAS and support EPA's intent to use these data to ensure the future permits will continue to protect designated uses.

CRC appreciates the opportunity to provide comments on the draft permit. I can be reached at kwentling@ctriver.org or (413) 834-9777.

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