



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 1**

**5 Post Office Square - Suite 100**

**Boston, MA 02109-3912**

February 11, 2021

Re: Corrections to the Draft Permit and Fact Sheet, NPDES Permit No: MA0001091

The United States Environmental Protection Agency, Region 1 (EPA) identified a significant omission in the Gulf Oil Limited Partnership Draft Permit and Fact Sheet following posting for public notice on February 10, 2021. This notice provides confirmation that EPA intends to correct the omission and make minor typographical corrections. EPA has posted this notice of correction, as well as the amended documents on EPA’s website at <https://www.epa.gov/npdes-permits/massachusetts-draft-individual-npdes-permits>.

To be specific, EPA has added monitoring requirements for per- and polyfluoroalkyl substances (PFAS), consistent with the rationale explained in the Fact Sheets for the four other bulk petroleum storage terminals located along the Chelsea River (i.e., Chelsea Sandwich LLC permit #MA0003280, Sunoco Partners Marketing and Terminals L.P. permit #MA0004006, Irving Oil Terminals, Inc. permit #MA0001929, and Global Companies LLC permit # MA0000825). The correction made to the Draft Permit appears on page 4 of 25 in the Effluent Limitations and Reporting Requirements table for Outfall 003 and the accompanying footnote appears on page 9 of 25 in the Draft Permit, as shown below.

Effluent Characteristic	Effluent Limitation		Monitoring Requirements <sup>1,2,3</sup>	
	Average Monthly	Maximum Daily	Measurement Frequency <sup>4</sup>	Sample Type
Perfluorohexanesulfonic acid (PFHxS) <sup>12</sup>	---	Report ng/L	1/Quarter	Composite
Perfluoroheptanoic acid (PFHpA) <sup>12</sup>	---	Report ng/L	1/Quarter	Composite
Perfluorononanoic acid (PFNA) <sup>12</sup>	---	Report ng/L	1/Quarter	Composite
Perfluorooctanesulfonic acid (PFOS) <sup>12</sup>	---	Report ng/L	1/Quarter	Composite
Perfluorooctanoic acid (PFOA) <sup>12</sup>	---	Report ng/L	1/Quarter	Composite
Perfluorodecanoic (PFDA) <sup>12</sup>	---	Report ng/L	1/Quarter	Composite

12. This reporting requirement for the listed PFAS parameters takes effect six months after EPA's multi-lab validated method for wastewater is made available to the public on EPA's CWA methods program website. See <https://www.epa.gov/cwa-methods/other-clean-water-act-test-methods-chemical> and <https://www.epa.gov/cwa-methods>. After one year of monitoring, if all samples are non-detect for all six PFAS compounds, using EPA's multi-lab validated method for wastewater, the Permittee may request to remove the requirement for PFAS monitoring. See Part I.D.3.

The omission of the rationale underlying the PFAS monitoring requirement in the Fact Sheet appears in Section 5.2.5.7, beginning on page 40. The Table of Contents has been adjusted to reflect any changes in page and section numbering as a result of the addition of omitted rationale in this section. This rationale is identical to the rationale included in the Fact Sheets for the four other bulk petroleum storage terminals located along the Chelsea River (i.e., Chelsea Sandwich LLC permit #MA0003280, Sunoco Partners Marketing and Terminals L.P. permit #MA0004006, Irving Oil Terminals, Inc. permit #MA0001929, and Global Companies LLC permit # MA0000825).

In addition, EPA has corrected several typographical errors in the Draft Permit that have resulted in slight adjustment to the number of pages and sections. Specifically, a special condition regarding stormwater transfer included in Part I.C.6 of the Draft Permit has been removed, as it is a site-specific special condition for the Global Companies LLC permit # MA0000825 only, the Massachusetts Department of Environmental Protection has been removed from the signature block on the cover page of the Draft Permit, and the headers/footers/notation have been corrected in the Draft Permit and Fact Sheet to reflect the 2021 revised issuance date.

Although EPA could have waited until receiving public comments to make the corrections and to incorporate the omitted monitoring requirements, EPA decided it would be better to make the corrections and notify the public immediately at the start of the public comment period to avoid or minimize unnecessary confusion. Since the public comment period for the Draft Permit is February 10, 2021 to April 11, 2021, EPA has decided that it is not necessary to extend the current comment period. As of this date, 59 days remain in the comment period.

EPA apologizes for the above-described errors. Technical questions regarding this notification letter can be directed to Shauna Little at (617) 918-1989.

Sincerely,

**DAMIEN  
HOULIHAN**

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Damien Houlihan, Acting Branch Chief  
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