



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, NPDES Permit No: MA0004006

The United States Environmental Protection Agency, Region 1 (EPA) identified a significant omission in the Sunoco Partners Marketing and Terminals L.P. Draft Permit 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 document on EPA’s website at [https://www.epa.gov/npdes-permits/massachusetts-draft-individual-
npdes-permits](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 Sheet for the Facility and three other bulk petroleum storage terminals located along the Chelsea River (i.e., Chelsea Sandwich LLC permit #MA0003280, Irving Oil Terminals, Inc. permit #MA0001929, and Global Companies LLC permit # MA0000825). The correction made to the Draft Permit appears on page 4 of 26 in the Effluent Limitations and Reporting Requirements table for Outfall 001 and the accompanying footnote appears on page 10 of 26 in the Draft Permit, as shown below.

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

In addition, EPA has corrected several typographical errors in the Draft Permit that have resulted in slight adjustment to the numbering of conditions. 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, PFAS has been added to the list in Part I.D.3.a of the Draft Permit, and the header has been corrected 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
Water Permits Branch
Water Division