

RESPONSE TO COMMENTS
Mobil Oil Mariana Islands, Inc.
NPDES Permit No. MP0020397
September 2025

EPA posted a public notice of proposed action on EPA's website, accepting public comment from April 11, 2025 through May 12, 2025. The draft NPDES Permit and Fact Sheet for the Mobil Oil Saipan Terminal were posted on the EPA website for the duration of the public comment period.

Mobil Oil Mariana Islands, Inc. submitted comments on the draft NPDES Permit and Fact Sheet via a letter on May 8, 2025. EPA has responded to these comments below (#1 - #8).

EPA also received comments from Mobil Oil Mariana Islands, Inc. after the close of the comment period on July 30, 2025. EPA has opted to respond to these late comments (#9 - #11).

Comment #1: Mobil requests that the Fact Sheet acknowledge the infrequency and low daily volume of the intermittent discharges from the Saipan Terminal. Mobil has compiled the Outfall 001 dates, total flows, and duration of discharge for all events from January 2019 through October 2024. There were 54 days during this period when the Terminal discharged to the Harbor. The flow data are provided in the table attached to these comments. During the January 2019 - October 2024 time period, the Saipan Terminal discharged an average of 10.8 days/year (average duration = 7.4 hours/year total - i.e., most discharges were less than one hour duration). The average flow/discharge was 16,003 gallons/day. The limits in the draft permit are calculated assuming a continuous discharge 24 hours/day, 365 days/year from Outfall 001 so they are highly protective, given that the actual discharges are very infrequent and result from significant rainfall events.

Response #1: Noted. EPA added this information to the Fact Sheet Section V.

Comment #2: Fact Sheet Provision VI.C. Temperature

Mobil acknowledges that the Commonwealth of the Northern Marianas Islands (CNMI) has established a water quality standard of 1 °C rise above ambient water temperature. Mobil believes that the CNMI temperature standard is unclear with respect to its application at a specific discharge location, such as in Tanapag Harbor, that may have naturally elevated water temperatures because it is closed on three sides and is shallow compared to ocean water surrounding the island. The CNMI water quality standards (WQS) mixing zone regulation at § 65-130-501 is applicable to temperature as promulgated, i.e., it is not limited to any specific water quality constituents. CNMI has authorized a mixing zone for Outfall 001 and Mobil believes that the approved mixing zone should be considered as applicable in any future evaluation of effluent temperature.

Mobil does not object to temperature monitoring when discharging but wants the permit records to reflect that it does not generate a thermal wastewater, i.e., there is no heat source, other than natural heating, at the terminal that would increase the temperature of the effluent

above ambient air temperatures and sunlight. The comparison to ambient water temperatures in the ocean water around Saipan, as acknowledged in the Fact Sheet, is likely not applicable to the near shore, shallower water in the Harbor. Moreover, the Saipan Terminal has no method to allow it to cool the wastewater effluent.

Response #2: Noted. EPA added information to the Fact Sheet Section V about temperature of the discharge. As stated in the Fact Sheet, a new USGS monitoring station started reporting temperature data in December 2023 and should be useful in future determinations of ambient temperature. Additionally, the mixing zone approval issued by CNMI BECQ (Attachment E of the permit) includes temperature as a parameter.

Comment #3: Fact Sheet Provision IX.B. Asset Management

Mobil objects to the inclusion of a requirement to develop an Asset Management Plan (ASP) for the Saipan Terminal. The objective of an ASP, as described by EPA, is: "the practice of managing infrastructure capital assets to minimize the total cost of owning and operating them while delivering the service level customer's desire. This management framework has been widely adopted by the water sector as a means to pursue and achieve sustainable infrastructure." The EPA's ASP guidance is designed for public and private water utilities that have many residential and business customers and often have collection and treatment systems serving large geographic areas. They are not comparable to wastewater treatment systems at industrial facilities.

Major industrial companies, including Mobil, have comprehensive asset management systems that may or may not comport with EPA's model approach. Industry asset management systems include a diverse range of equipment and operations, e.g., testing of the integrity of storage tanks at a bulk terminal or assessing the operating life of pumps in the wastewater treatment system. Developing a site-specific asset management plan – focus only on wastewater treatment – is redundant and impractical.

Response #3: Noted. EPA added a statement to the Permit Part II.F that an existing comprehensive AMP for the facility can satisfy this requirement.

Comment #4: Permit Part I.B. Table 1. Ammonia, Outfall 001

The permit requires analysis of effluent ammonia once/dischARGE. It does not specify if the analysis is for ammonia as NH_3 or ammonia as N. The CNMI water quality standard (WQS) for ammonia is 0.02 mg/L (un-ionized) (§65-130-410 Nutrients). The ionization of ammonia is dependent upon the pH of an aqueous solution. For example, at pH 8.9, the maximum allowable pH of the Outfall 001 effluent, approximately 34% of the ammonia in an effluent sample will be ionized ammonia. At the lower effluent pH limit in the draft permit of 7.2 the fraction of ionized ammonia is 1.4%. Mobil requests that the ammonia monitoring and reporting requirement in the permit be measured and reported as un-ionized ammonia to allow comparison to the CNMI WQS.

Response #4: The ammonia monitoring and reporting requirement in Permit Part I.B. Table 1 has been updated to be measured and reported as unionized ammonia for comparison to the *CNMI Water Quality Standards*.

Comment #5: Permit Part I.B. Table 1. Dissolved Oxygen Monitoring, Outfall 001

Table 1 of the draft permit includes monitoring the effluent for dissolved oxygen (DO) once/discharge. There is no technical or regulatory basis provided in the Fact Sheet for the proposed monitoring of DO in the effluent. The effluent monitoring history as shown in Table 3 of the Fact Sheet documents that the maximum concentration of 5-day biochemical oxygen demand (BOD) in 13 effluent samples was 2.4 mg/L; 10 of the samples were reported as not detected. These data support that the oxygen demanding constituents in the Outfall 001 discharge is negligible. In addition, because discharges only occur intermittently during or shortly following a significant rain event, the runoff will have oxygen concentrations that are essentially at saturation.

Response #5: Section § 65-130-415 of the *CNMI Water Quality Standards* establishes a requirement that the concentration of dissolved oxygen in all waters shall not be less than 75% saturation. Dissolved oxygen monitoring is included in the permit to satisfy this requirement. Additionally, BOD is not a direct measurement of dissolved oxygen in the discharge. Permit Part I.B. Table 1. has been revised from once/discharge in the draft permit to quarterly monitoring in the final permit. The Fact Sheet Section VI.C has been updated with rationale.

Comment #6: Permit Part I.C. Chronic Toxicity Effluent Limits and Monitoring Requirements – Outfall Number 001

Mobil appreciates that EPA has extended the holding time for whole effluent toxicity (WET) samples to 72 hours for the Pacific Islands when samples must be shipped to the mainland for analysis (Permit - Part II.c.4.c.). As stated at the beginning of these comments, even this holding time extension may be insufficient for samples from the Saipan Terminal because the samples are shipped by air from Saipan to Guam and then from Guam to California. Furthermore, because the discharge from the Saipan Terminal is intermittent (primarily driven by stormwater captured on-site) it can be difficult logistically to identify when to send the consultant to collect the sample, return it to Guam, and then ship it to California to assure it arrives at the laboratory in time for them to start the testing before the 72 hours elapse from the time of collection to when the test is initiated by the lab lapses.

Because of these limitations, Mobil requests that the EPA add a provision in the permit that allows the company to document its efforts to meet the 72-hour requirement and acknowledges that the schedule may not be achieved through no fault of the discharger as supported by the documentation.

Response #6: EPA recognizes the challenges of shipping WET samples from Saipan to the mainland via Guam for analysis. However, based on current available information, including current WET methods and guidelines, EPA cannot confirm a hold time beyond 72 hours will ensure sample integrity. No change was made in the final permit.

Comment #7: Permit Part II.E. Tiered Outfall Habitat Assessment and Reporting

There is no mention or regulatory/scientific justification for this Special Condition provided in the Fact Sheet. Mobil objects to this Standard Condition for the following reasons:

1. The Mobil discharge enters the harbor through the Commonwealth Port Authority (CPA) storm sewer that drains the dock area. The Mobil discharge is a very small proportion of

the total flow discharged from the storm sewer to Tanapag Harbor. The 6-foot by 3-foot underground CPA storm sewer drains the dock and the contiguous area. Vehicles, including many large trucks, containers, vessel loading and unloading and related port activities contribute pollutants that accumulate on the paved surface of the port. The CPA drainage area served by the storm sewer is over three times larger in surface area than the drainage area of the Mobil Terminal. The fact that the area is paved means that rainfalls of 0.25 inches or less will generate stormwater runoff that is discharged to Tanapag Harbor.

2. Tanapag Harbor is used for moorage and loading/unloading of motor vessels. These vessels and supporting operations offer the opportunity to leak small amounts of fuels and lubricants into the harbor waters. Vessel exhausts will release combustion byproducts to the surface water, especially when those exhausts are submerged. Unlike the infrequent discharges from the Mobil Terminal, these sources of pollutants will be operating everyday that there are vessels using the Harbor, including when they are moored.
3. The Mobil Saipan Terminal collects and stores rainfall on the site in the storage tank containment areas so that it can be treated and discharged at a controlled rate to assure effective treatment. In contrast, the CPA drainage area has no containment and treatment and constituents on the paved surfaces such as oil and fuel that may leak from vehicles, residues from vehicle exhaust, materials spilled from containers, and rubber from tires all are washed into the storm sewer and discharged to Tanapag Harbor from every rainfall event.
4. The Saipan Terminal discharges approximately 16,000 gallons/event and discharged on only 54 days between January 2019 and through October 2024 (approximately 3% of the days in the record).
5. Mobil's self-reporting data for its discharges (Table 3, Fact Sheet) documents that the treated effluent contributes insignificant amounts of pollutants to Tanapag Harbor when there is a discharge from Outfall 001. When the low volume of each discharge and the very low frequency of discharge is considered, it is apparent that the Saipan Terminal is de minimis in comparison with the surface runoff from the CPA dock area and the use of the Harbor by motor vessels.
6. CPA's storm sewer discharges untreated stormwater to Tanapag Harbor every time there is a rainfall event. If there is any accumulation of pollutants in the Harbor, the dominant source such pollutants will be the CPA stormwater.

Given that the Mobil Saipan Terminal is the most insignificant potential source of water pollutants discharged to the Tanapag Harbor, it is inequitable and not technically justified to require it to perform the proposed Tiered Outfall Habitat and Assessment and Reporting.

Response #7: EPA acknowledges the Commenter’s estimate that Mobil Saipan Terminal discharge is a small proportion of the total flow discharged from the CPA storm sewer to Tanapag Harbor. However, this permit authorizes discharges of pollutants by the Permittee and the Tiered Outfall Habitat Monitoring requirement ensures that this discharge is in compliance with applicable standards, designated uses, and protection of essential fish habitat. The Tiered Outfall Habitat Monitoring requirement supports the objective of the Clean Water Act, Section 101, to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters” 33 U.S.C. § 1251(a) and the Magnuson-Stevens Fishery Management and Conservation Act (MSA) to promote the protection of essential fish habitat. There is minimal site-specific information regarding the benthic habitat characteristics in the vicinity of the Permittee’s outfalls. EPA included the benthic habitat monitoring requirements to obtain baseline monitoring data. EPA updated Permit Part II.E to clarify requirements for the Tiered Outfall Habitat Monitoring. See also Fact Sheet Sections IX.B, X.A and X.C for further information.

In response to comments about other discharges, they are typically covered under different permits and may have unique requirements to address specific environmental and site conditions. In response to comments about vessels, incidental discharges of oil, fuel, and other pollutants by applicable vessels within waters of the United States are typically covered under the [2013 Vessel General Permit](#) and interim requirements and the [Vessel Incidental Discharge Act \(VIDA\)](#) and [associated regulations](#).¹ In response to comments about the CPA storm sewer, stormwater discharges from this type of source is typically covered under a [Municipal Separate Storm Sewer System \(MS4\)](#) or the [Multi-Sector General Permit \(MSGP\)](#).

Comment #8: Permit Part II.F. Asset Management

Mobil objects to this requirement for the reasons explained in our comments on the Fact Sheet. Industry asset management systems include a diverse range of equipment and operations, e.g., testing of the integrity of storage tanks at a bulk terminal or assessing the operating life of pumps in the wastewater treatment system. Developing a site-specific asset management plan - focused only on wastewater treatment - is redundant and impractical.

Response: See Response #3.

¹ The Vessel Incidental Discharge Act (VIDA) and [associated regulations](#) (see also 33 CFR 155 and 40 CFR 139.6) control incidental discharges of oil, fuel, and other pollutants by applicable vessels within waters of the United States. Concerns regarding harmful discharges can be reported to EPA enforcement for review.

LATE COMMENTS: EPA also received comments from Mobil Oil Mariana Islands, Inc. on July 30, 2025 after the close of the comment period. EPA has opted to respond to these comments.

Comment #9: The NMFS rule excludes Saipan Harbor as critical coral habitat.

The final NMFS rule establishing designated critical habitat locations for Indo-Pacific corals was adopted on July 15, 2025, at 50 CFR 226.232 (90 Fed. Reg. 31800). The final rule at 50 CFR 226.232(d) identifies "Areas not included in critical habitat". The list of areas not included in critical habitat for Indo-Pacific corals identifies Saipan Harbor [50 CFR 226.232(d)(2)(xii)]. The final rule describes the reasons for identifying "areas not included in critical habitat" and these reasons are consistent with Mobil's May 8" comments on the proposed permit'. Appendix B of the National Oceanic and Atmospheric Administration's (NOAA) Critical Habitat Information Report (Existing Artificial Substrates and Managed Areas within the Critical Habitat Units of Final Coral Critical Habitat, May 2024, page 5) specifically excludes "All harbors and their entrance channels, navigation channels, turning basins, and berthing areas managed by the Commonwealth Ports Authority" as critical habitat identified by the final rule. The final NMFS rule assessed and specifically excludes Saipan Harbor (location where the ExxonMobil Saipan's Terminal intermittently discharges) as critical coral habitat and therefore does not justify the proposed Part II.E. Tiered Outfall Habitat Assessment and Reporting requirement in the draft NPDES permit.

Response #9: EPA acknowledges that the final ESA rule identifies Saipan Harbor² as one of the areas not included in the designated ESA critical habitat for Indo-Pacific corals [50 CFR 226.232(d)(2)(xii)]. EPA updated the Fact Sheet to remove the critical habitats for Indo-Pacific corals³ as rationale for the Tiered Outfall Habitat Monitoring requirement in the final permit.

However, EPA retained the requirement for the Tiered Outfall Habitat Monitoring in the final permit. See Response#7 and Response #11.

Comment #10: The critical habitat rules relating to the green sea turtle are proposed rules. The critical habitat rules relating to the green sea turtle are proposed rules (88 Fed. Reg. 46376, July 19, 2023; 88 Fed. Reg. 46572, July 19, 2023). Because these are not final rules and are subject to change, they should not be used as the basis for the proposed Part II.E. Tiered Outfall Habitat Assessment and Reporting requirement in the draft NPDES permit. Although a proposed rule is not a regulatory basis for the habitat assessment requirement in the proposed NPDES permit, the rule proposal at 88 Fed. Reg. 46524-46525 (maps and descriptions of proposed critical habitat) identifies no critical habitat for the green sea turtle at the location of the Commonwealth Port Authority (CPA) harbor where the Mobil Saipan Terminal discharges. The

² For purpose of this permit, fact sheet, and response to comments, EPA considers the terms Saipan Lagoon, Saipan Harbor, and Tanapag Harbor all reference the same receiving water for the discharge.

³ ESA designated critical habitat is covered by the Endangered Species Act of 1973 (16 U.S.C. § 1536). Essential fish habitat is covered by the Magnuson-Stevens Fishery Management and Conservation Act (MSA). ESA designated critical habitat and MSA essential fish habitat do not always overlap or have the same requirements for protection. Monitoring requirements are subject to site specific designations.

critical habitat designation in this proposed rule is intended to protect turtle nesting areas that are sandy beaches. There are no sandy beaches within the CPA harbor area as shown by the maps in the proposed regulation. Thus, the proposed rule relating to green sea turtle onshore critical habitat would not support the proposed inclusion of the Part II.E. Tiered Outfall Habitat Assessment and Reporting requirement in the draft NPDES permit, even if the proposed rule was finalized as written.

The second proposed green sea turtle critical habitat rule (88 Fed. Reg. 46572, July 19, 2023) designates areas from the mean highwater line to a 20-meter depth around the entire island as critical habitat to protect turtle migratory and related essential conditions (88 Fed. Reg. 46574-46575). Again, recognizing that this is a proposed rule and not a regulatory basis for an NPDES permit limit or condition, the intermittent, short duration discharges from the Mobil Saipan Terminal as related to other discharges from the same CPA outfall, as described in Mobil's May 8, 2025 comment letter, cannot reasonably be expected to have any measurable effects on water quality in the critical habitat area described in the proposed rule (i.e., the entire offshore waters to a 20-meter depth), even on a short-term basis", and would not support the proposed inclusion of the Part II.E. Tiered Outfall Habitat Assessment and Reporting requirement in the draft NPDES permit, even if the proposed rule was finalized as written.

Mobil has identified other NOAA documents that support the site's position that the proposed Part II.E Tiered Outfall Habitat Assessment and Reporting requirement is not justified for this permit. The attached NOAA aerial map identifies dredged areas leading into and surrounding the Saipan Harbor (middle bottom of map at bottom - text indicating Mobil Saipan Terminal added). Saipan Terminal's outfall discharges into a CPA managed dredged area. Areas that are maintained by dredging to accommodate marine traffic described by NMFS in Appendix B of the Critical Habitat Information Report as cited above are designated as "managed areas" and are not considered to be critical habitats. Maintenance dredging conducted by others, independent of terminal operations, directly affect the localized benthic habitat including green turtle foraging and resting areas than highly infrequent, small-volume discharges from the Saipan Terminal are regulated by the NPDES permit, which have effluent limits and conditions in the permit that comply with water quality standards. In line with the critical habitat exclusions under 50 CFR 226.232(d)(2) for Indo-Pacific Corals, Mobil believes similar exclusions would be applicable towards potential Sea Turtle Habitat located in "managed areas", based on the agencies acknowledgement that habitat will be impacted.

"These managed areas include specific areas where the substrate has been disturbed by planned management authorized by local, territorial, state, or Federal governmental entities at the time of critical habitat designation and will continue to be periodically disturbed by such management".

Response #10: EPA updated the Fact Sheet to remove the proposed ESA critical habitats for green sea turtles⁴ as a rationale for the Tiered Outfall Habitat Monitoring requirement in the final permit.

However, EPA retained the requirement for the Tiered Outfall Habitat Monitoring in the final permit. See Response #7 and Response #11.

Comment #11: Inconsistent application of Outfall Habitat Assessment and Reporting Requirements.

There also appears to be a lack of consistency in how this provision is being applied to the proposed Mobil Saipan NPDES permit when compared to other recent EPA Region 9 NPDES permits in the Pacific Islands Territories that have discharges that may affect the green sea turtle and Indo Pacific corals. For example, the U.S. Navy Apra Harbor wastewater treatment plant permit (GU0110019) that was issued in May 2025, does not include the tiered habitat assessment and reporting requirement even though the Central West Pacific green sea turtle and Indo Pacific corals are located near or within the discharge area. This WWTP is classified as a major discharger that is permitted to discharge treated wastewater on a continuous basis at a monthly average discharge flow rate of 2-3 million gallons/day and has effluent limits for fifteen (15) metals, ammonia and nitrate nitrogen, phosphorus, and the priority volatile, semi-volatile and base-neutral organic pollutants, including 2,3,7,8-tetrachlorodibenzo-p-dioxin. The Fact Sheet to the permit states "EPA has determined that reissuance of the NPDES permit may affect, but is not likely to adversely affect, the Central West Pacific green sea turtle, hawksbill sea turtle, Indo-West Pacific scalloped hammerhead shark, giant manta ray, and the coral species *Acropora globiceps*. EPA also determined that the proposed permitting action will not destroy or adversely modify the proposed critical habitats for the central-west Pacific DPS green sea turtle or the indo-Pacific corals."

The Fact Sheet to the Mobil Saipan Terminal NPDES permit includes similar language regarding the effects of the discharge on the proposed critical habitat for the green sea turtle and Indo Pacific corals as the Fact Sheet to the Navy's WWTP NPDES permit. The Fact Sheet to the Mobil Saipan Terminal NPDES permit includes the following statements "EPA has concluded the permit is not likely to destroy or adversely modify the proposed green sea turtle critical habitat in the greater Tanapag Harbor" and "EPA has concluded the permit is not likely to destroy or adversely modify the proposed coral critical habitat in the greater Tanapag Harbor." The Fact Sheet also includes the following statement "For the marine species, EPA concludes the continued discharge may affect but not likely to adversely affect the federally listed threatened and endangered turtles, sharks, corals, and giant clams under the NOAA NMF jurisdictions. The effluent limits in the permit will not result in acute or chronic exposures to contaminants that would affect federally listed threatened and endangered species or impair any designated

⁴ ESA designated critical habitat is covered by the Endangered Species Act of 1973 (16 U.S.C. § 1536). Essential fish habitat is covered by the Magnuson-Stevens Fishery Management and Conservation Act (MSA). ESA designated critical habitat and MSA essential fish habitat do not always overlap or have the same requirements for protection. Monitoring requirements are subject to site specific designations.

critical habitat. The effluent limits and monitoring requirements in the permit are designed to be fully protective of the beneficial uses of the receiving waters. Proposed critical habitat for the green sea turtle and coral species may be affected but are not likely to be adversely affected by the permit reissuance."

When comparing the similar critical habitat determinations by EPA in the Fact Sheets of the Mobil Saipan Terminal NPDES permit and the US Navy's NPDES permit and considering the infrequent, low volume discharge from the Mobil Saipan Terminal to the continuous large volume discharge from the US Navy's Apra Harbor WWTP, one would expect that since the Navy WWTP NPDES permit does not include the Tiered Outfall Critical Habitat Assessment requirement, then neither would the Mobil Saipan Terminal. However, that is not the case. Therefore, Mobil requests that EPA remove the Tiered Outfall Critical Habitat Assessment requirement from the Mobil Saipan Terminal's NPDES permit to be consistent with other Pacific Islands Territories NPDES permits issued by EPA Region 9.

Response #11: The Permittee is discharging through the CPA storm sewer outfall to waters that are identified as Essential Fish Habitat (EFH) under the Western Pacific Fishery Management Council's, Pelagic and Mariana Archipelago Fishery Ecosystem Plans (WPFMC 2009a, 2009b). In the EFH consultation, NMFS stated there is minimal site-specific information regarding the habitat characteristics in the vicinity of the CPA storm sewer outfall ("Unknown according to the Saipan Lagoon BIOMapper).⁵ NMFS identified potential adverse effects to EFH in the immediate vicinity of the CPA storm sewer outfall from discharged pollutants (both sorbed to particles and dissolved) and EPA's analysis that certain parameters have reasonable potential to exceed water quality criteria. NMFS concurred that a 50-ft radius was adequate for Tier I Outfall Habitat Monitoring. Upon review of the Tier I monitoring submittal, if EPA determines that there is evidence of coral reefs, seagrass beds, or other types of substrate or habitat, then EPA may require Tier II monitoring to obtain additional information of the benthic habitat. EPA updated Permit Part II.E to clarify requirements for the Tiered Outfall Habitat Monitoring. See also Fact Sheet Sections IX.B, X.A and X.C for further information.

The Permittee's circumstances are similar to the Sadog Tasi Wastewater Treatment Plant (Sadog Tasi) (permit No. MP0020010, issued June 2023), a facility in the Pacific Islands Territories that discharges to Tanapag Harbor like the Permittee. The Sadog Tasi permit requires a Special Study – Outfall Inspection, Repairs and Reporting to inspect and assess the ocean floor and benthic habitat via visual observation regarding corals and habitat for corals and fish that may exist within a 50 ft. radius of the outfall terminus.

The Permittee's circumstances are similar to [Chelsea River Bulk Petroleum Storage Facilities NPDES permits](#). On September 30, 2022, U.S. EPA Region 1 issued five final NPDES permits

⁵ ESA designated critical habitat is covered by the Endangered Species Act of 1973 (16 U.S.C. § 1536). Essential fish habitat is covered by the Magnuson-Stevens Fishery Management and Conservation Act (MSA). ESA designated critical habitat and MSA essential fish habitat do not always overlap or have the same requirements for protection. Monitoring requirements are subject to site specific designations.

under the Clean Water Act for bulk petroleum storage facilities located along Chelsea River: Global Companies, LLC Terminal in Revere (MA0000825); Gulf Oil Terminal in Chelsea (MA0001091); Irving Oil Revere Terminal in Revere (MA0001929); Chelsea Sandwich Terminal in Chelsea (MA0003280) and Sunoco Logistics East Boston Terminal in Boston (MA0004006). All five final NPDES permits include bioassessment monitoring with water column characterization, substrate characterization, benthic pollutant analysis, and biological monitoring.

In response to the comment regarding comparison to U.S. Navy Apra Harbor Wastewater Treatment Plant (Apra Harbor) (permit No. GU0110019, issued May 2025), each permit is designed in part to address specific environmental and site conditions, thus each permit may have unique requirements. The Apra Harbor facility has a submerged outfall in Tipalao Bay that terminates at a diffuser located approximately 1,845 feet from shore, at a depth of 120 feet. The Apra Harbor permit requires receiving water monitoring through the Guam EPA 401 certification.

In response to the comment regarding critical habitat for green sea turtle and coral, see Response #9 and Response #10.