

July 29, 2014

Ms. Olga Vergara
United States Environmental Protection Agency
Office of Ecosystem Protection
5 Post Office Square, Suite 100
Boston, MA 02109-3912

RE: Town of Braintree – Great Pond Water Treatment Plant
Potable Water Treatment Facility General Permit
NPDES General Permit Notice of Intent
Transmittal Number W070877

Dear Ms. Vergara:

On behalf of the Town of Braintree, please find enclosed a Notice of Intent (NOI) for coverage of the Great Pond Water Treatment Plant (WTP) under the National Pollutant Discharge Elimination System (NPDES) General Permit for discharges from Potable Water Treatment Facilities (PWTF). The Great Pond WTP is located at 300 King Hill Road in Braintree, Massachusetts (refer to Figure 1 - Site Locus). In 2005, the Town had applied for coverage under the NPDES General Permit for Water Treatment Facility Discharges (refer to Attachment 1). With this current NOI, the Town is seeking coverage under the latest NPDES General Permit.

This NOI package consists of the following:

- Environmental Protection Agency (EPA) PWTF NPDES General Permit NOI form;
- Site figures including a site locus and a site plan identifying the WTP's discharge locations;
- A letter from Kathleen Keohane of MassDEP to Tom Whalen of the Braintree Water & Sewer Department dated January 10, 2006; and
- US Fish and Wildlife Service documentation indicating that there are no listed species or critical habitats near the WTP.

The NOI form provides an overview of the Great Pond WTP physical and chemical treatment processes. The Great Pond WTP currently has one active outfall pipe and two inactive overflow pipes. The pipe from North Lower Lagoon is the primary outfall pipe for which coverage is being requested under the NPDES program.

In accordance with your July 17, 2014 email to the Braintree Water Works Superintendent, Lou Dutton, complete water quality data will be submitted separately when it is available (pH).

Hyannis:

396 North Street, Hyannis, MA 02601
TL 508.568.5103 • FX 508.568.5125

Headquarters:

1900 Crown Colony Drive, Suite 402, Quincy, MA 02169
TL 617.657.0200 • FX 617.657.0201

Woburn:

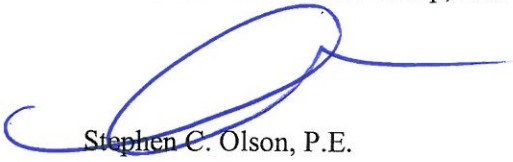
18 Commerce Way, Suite 2000, Woburn, MA 01801
TL 781.281.2542 • FX 781.281.2543

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July 29, 2014

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Thank you for your cooperation and assistance. Please feel free to contact me at (617) 657-0255 (sco@envpartners.com) or the Water Works Superintendent, Lou Dutton at (781) 794-8248 (ldutton@braintree.ma.gov) if you have any questions or require additional information.

Very Truly Yours,
Environmental Partners Group, Inc.



Stephen C. Olson, P.E.
Senior Project Manager

Encl: PWTF NPDES General Permit NOI
Figures
Attachment A – DEP Letter to Tom Whalen – January 10, 2006
Attachment B – U.S. Fish and Wildlife Service Trust Resources List

CC: MassDEP, Division of Watershed Management
Jim McLaughlin, MassDEP
Shauna Little, US EPA
Marybeth Chubb, MassDEP
Thomas Whalen, Director of Public Works, Town of Braintree
Lou Dutton, Water and Sewer Superintendent, Town of Braintree

**APPENDIX IV
NOTICE OF INTENT INSTRUCTIONS
AND SUGGESTED FORMS**

I. Notice of Intent (NOI) Instructions

A. Required Information

In order to be covered by the Potable Water Treatment Facility General Permit (PWTF GP) applicants must submit a written NOI to EPA and the appropriate state agency. The NOI consists of either the suggested NOI form included in this Appendix or another form of official correspondence that contains all of the required information listed in the General Permit and the suggested NOI form.

B. Signature Requirements

The Notice of Intent must be signed and dated in accordance with the signatory requirements of 40 CFR Section 122.22, including the certification statement shown on the suggested NOI form.

Federal regulations require this application to be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For partnership or sole proprietorship, by a general partner or the proprietor, respectively; or,
3. For a municipality, State, Federal or other public facility, by either a principal executive officer or ranking elected official.

C. Submission of NOI to EPA

Signed and completed NOI forms and attachments must be submitted to EPA at the address included in Appendix VI. A copy of the NOI form and any additional state required forms must also be submitted to the appropriate state agency at the addresses included in Appendix VI. See Part 4.2 and Appendix VI of the PWTF GP for additional State requirements.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION I
ONE CONGRESS STREET, SUITE 1100
BOSTON, MASSACHUSETTS 02114-2023**

**Request for General Permit Authorization to Discharge Wastewater
(Notice of Intent to be covered by the General Permit (NOI))**

**Potable Water Treatment Facility (PWTF)
NPDES General Permit No. MAG640000 and NHG640000**

A. Facility Information

1. Facility Owner:

Name _____ e-mail _____
Street/PO Box _____ City _____
State _____ Zip Code _____
Contact Person _____ Telephone Number _____

2. Facility Operator (if different from above):

Name _____ e-mail (optional) _____
Street/PO Box _____ City _____
State _____ Zip Code _____
Contact Person _____ Telephone Number _____

3. Facility Data (attach topographic map or other map showing facility and discharge location(s)):

Name _____ e-mail (optional) _____
Street/PO Box _____ City _____
State _____ Zip Code _____
Contact Person _____ Telephone Number _____
Facility Latitude _____ Facility Longitude _____

4. Standard Industrial Classification (SIC Codes) and Descriptions of Processes:

SIC Code(s) _____
Description(s) _____

5. Current Permitting Status (please check yes or no):

1. Has a prior NPDES permit been granted for the discharge? Yes ____ (Permit Number: _____)
No ____
2. Is the discharge a "new discharge" as defined by 40 CFR Section 122.22? Yes ____ No ____
3. Is the facility covered by an individual NPDES permit? Yes ____ (Permit Number _____) No ____
4. Is there a pending application on file with EPA for this discharge? Yes ____ (Date of submittal: _____)
_____) No ____

B. Discharge Information

1. Name of Receiving Waterbody _____
2. Type of Receiving Waterbody (e.g. stream, lake, reservoir, estuary etc) _____
3. State Water Quality Classification: _____ Freshwater: _____ Marine Water: _____
4. Describe the discharge activities for which the owner/applicant is seeking coverage, including process discharges not specifically authorized in the PWTF GP which need to be authorized for discharge (and which attain the

effluent limits and other conditions of the general permit). This description should include all treatment methods used on the wastewater prior to discharge including lagoons, baffles, filter presses etc. If lagoons are used at the facility, please include the number and size of lagoons; the size and elevation of the entry pipe; the time of travel from the entry point of the discharge into the lagoon to the entry point to the receiving water; and the length of backwash cycle for any combination of number of filters. (attach extra sheets if necessary):

5. Please provide a diagram depicting the treatment methods, outfalls, and receiving water.

6. Number of outfalls: _____ Latitude and Longitude for each outfall (attach additional pages if necessary)

OUTFALL #	Latitude	Longitude
OUTFALL #	Latitude	Longitude

For each outfall:

7. What is the proposed sampling location(s) and proposed consistent times of the month for collecting samples:

C. Effluent Characteristics

1. List here and attach information on any water additives used at the facility (Including chemicals for pH adjustment, dechlorination, control of biological growth, and control of corrosion and scale in water pipes): _____

2. Please report here any known remediation activities or water-quality issues in the vicinity of the discharge.

3. Are aluminum-containing coagulants used at this facility? Yes____ No____

4. Does the discharge contain residual chlorine? Yes____ No____

5. Does the facility provide treatment to remove arsenic from the raw water source? Yes____ No____

6. Are phosphorus-containing chemicals added to the treated water at this facility? Yes____ No____

7. All applicants must attach a separate sheet listing all laboratory results (minimum of five) for total recoverable aluminum (in micrograms per liter) taken within the last six months. Do not include dilution when recording your results. See Section 4.4.5 of General Permit for more information.

8. Please include the following effluent data for each outfall:

<u>Characteristic (report if measured)</u>	<u>Average Monthly</u>	<u>Maximum Daily</u>
Discharge Flow (gpd)	_____	_____
TSS (mg/l)	_____	_____
pH (s.u.)	(min)_____	(max)_____
Total Recoverable Aluminum (ug/l)	_____	_____
Total Residual Chlorine (ug/l)	_____	_____

(continued on next page)

8. Continued

Characteristic (report if measured)

Whole Effluent Toxicity (%) LC50 _____ and/or C-NOEC _____

9. If the discharge contains aluminum and/or residual chlorine, please provide the reported or calculated seven day-ten year low flow (7Q10) of the receiving water, the dilution factor, and attach any calculations used to support stream flow and dilution calculations (See Appendix VII for dilution calculations and additional information):

7Q10 _____ cfs Dilution Factor _____ cfs

D. Endangered Species Act Eligibility

1. Using the instructions in Appendix I of the PWTF GP, under which criterion listed in Part II are you eligible for coverage under this general permit?

A _____ B _____ C _____ D _____ E _____ F _____

2. If you selected criteria D or F, has consultation with the federal services been completed? Yes _____ No _____

3. If consultation with U.S. Fish and Wildlife Service and/or NOAA Fisheries Service was completed, was a written concurrence finding that the discharge is “not likely to adversely affect” listed species or critical habitat received? Yes _____ No _____

4. Attach documentation of ESA eligibility as described below and required at Part 3.4.1 and Appendix I, Part III, Step 4, of the General Permit.

Criterion A - No federally-listed threatened or endangered species or federally-designated critical habitat are present: A copy of the most current county species list pages for the county(ies) where your site or facility and discharges are located. You must also include a statement on how you determined that no listed species or critical habitat are in proximity to your site or facility or discharge locations.

Criterion B – Section 7 consultation completed with the Service(s) on a prior project: A copy of the USFWS's and/or NMFS's, as appropriate, biological opinion or concurrence on a finding of “unlikely to adversely effect” regarding the ESA Section 7 consultation.

Criterion C – Activities are covered by a Section 10 Permit: A copy of the USFWS's and/or the NMFS's, as appropriate, letter transmitting the ESA Section 10 authorization.

Criterion D - Concurrence from the Service(s) that the discharge is “not likely to adversely affect” federally-listed species or federally-designated critical habitat (not including the four species of concern identified in Section I of Appendix I): A copy of the USFWS's and/or the NMFS's, as appropriate, letter or memorandum concluding that the discharge is consistent with the general permit's “not likely to adversely affect” determination.

Criterion E – Activities are covered by certification of eligibility: A copy of the documents originally used by the other operator of your site or facility (or area including your site) to satisfy the documentation requirement of Criteria A, B, C or D.

Criterion F - Concurrence from the Service(s) that the discharge is “not likely to adversely affect” species of concern, as identified in Section I of Appendix I: A copy of the USFWS and/or the NMFS, as appropriate, concurrence with the applicant's determination that the discharge is “not likely to adversely affect” listed species.

E. National Historic Properties Act Eligibility

1. Using the instructions in Appendix III of the PWTF GP, under which criterion listed in Part III are you eligible for coverage under this general permit?

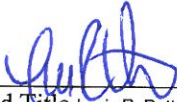
1 ☒ 2 ☐ 3 ☐

2. Have any State or Tribal historic preservation officers been consulted in this determination? Yes ☐ No ☒
If yes, attach the results of the consultation(s).

F. Certification

I certify that the discharge for which I am seeking coverage under the general permit consists solely of a surface water discharge from a potable water treatment facility. I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature



Date

7-29-13

Printed Name and Title Louis R. Dutton, Water Works Superintendent

Federal regulations require this application to be signed as follows:

1. For a corporation, by a principal executive officer of at least the level of vice president;
2. For partnership or sole proprietorship, by a general partner or the proprietor, respectively, or,
3. For a municipality, State, Federal or other public facility, by either a principal executive officer or ranking elected official.

Note: Permits No. MAG640000 and NHG640000 may be found at www.epa.gov/region1/npdes/pwtfgp.html

Figures

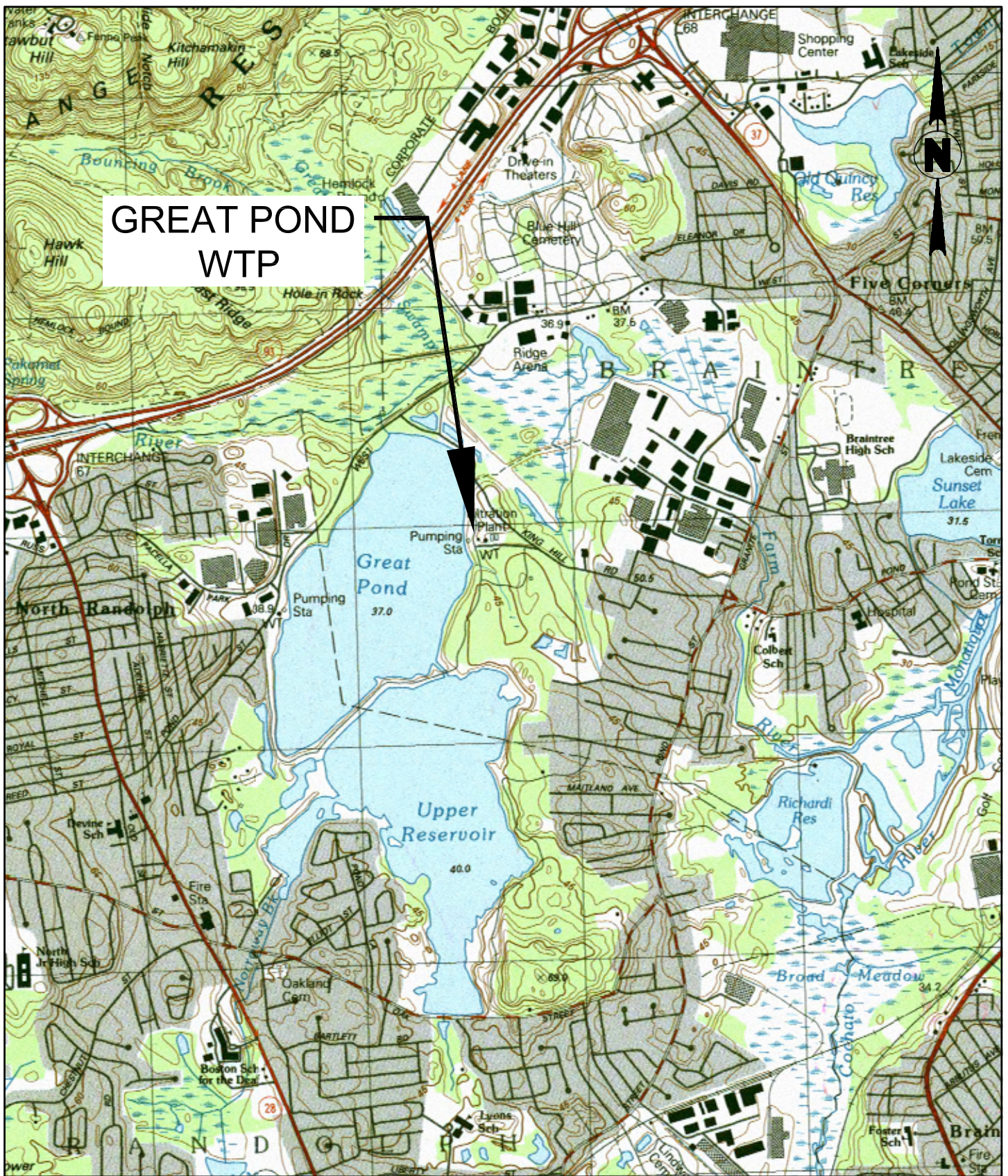


Figure 1 - Site Locus

Great Pond Water Treatment Plant
BRAINTREE, MA

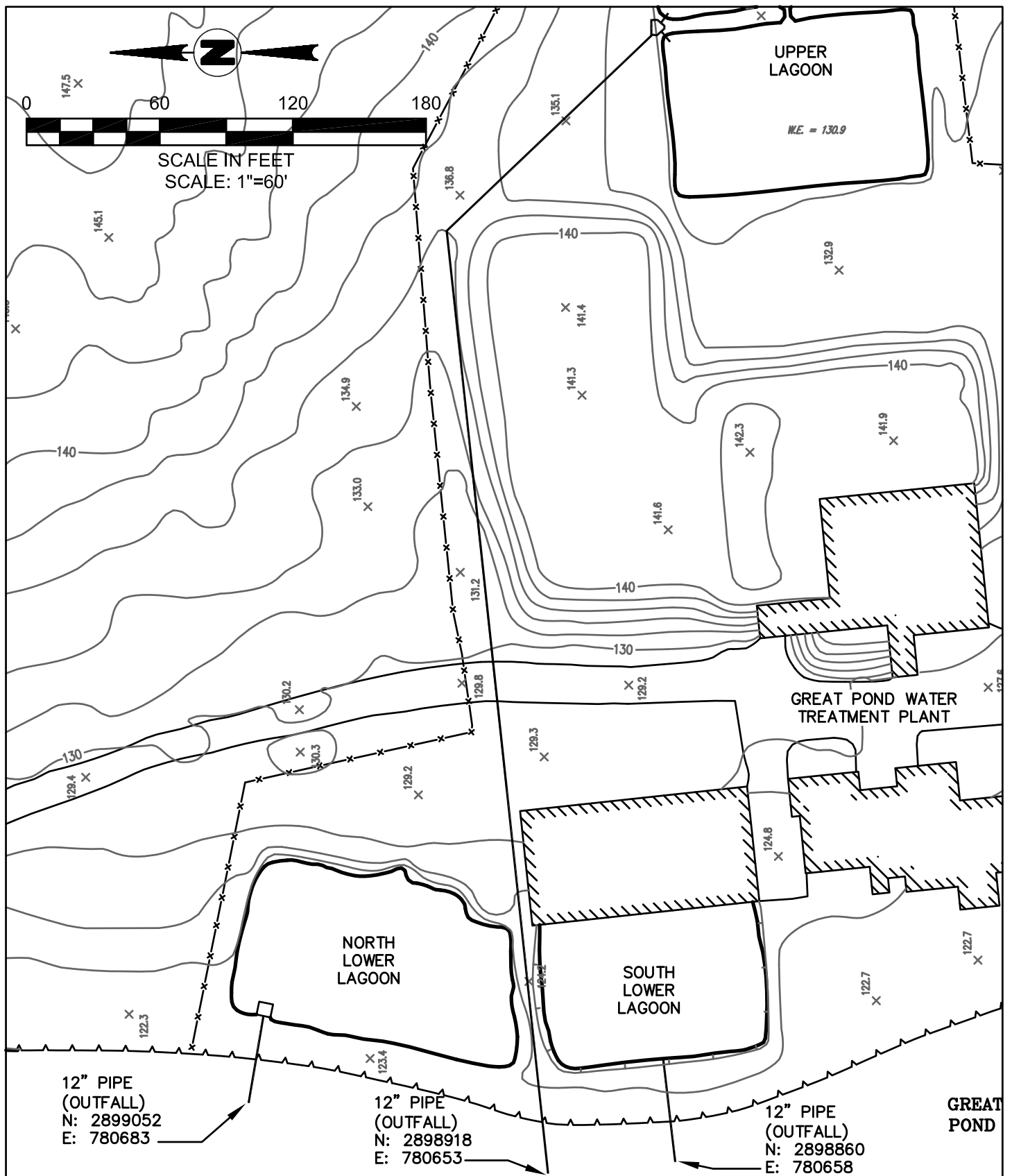
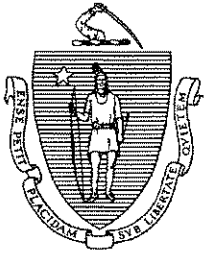


Figure 2

NPDES Discharge Locations
Great Pond Water Treatment Plant
Braintree, MA

Attachment A

DEP Letter to Tom Whalen – January 10, 2006



COMMONWEALTH OF MASSACHUSETTS
EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Division of Watershed Management, 627 Main Street 2nd Floor, Worcester, MA 01608

MITT ROMNEY
Governor

KERRY HEALEY
Lieutenant Governor

STEPHEN R. PRITCHARD
Secretary

ROBERT W. GOLLEDGE, Jr.
Commissioner

January 10, 2006

Tom Whalen
Director
Braintree Water and Sewer Department
90 Pond Street
Braintree, MA 02184

**Re: Braintree Great Pond Water Treatment Plant
Transmittal #W070877
NPDES General Permit for Water Treatment Facility Discharges**

Dear Mr. Whalen:

The Department of Environmental Protection (MassDEP), Division of Watershed Management, has received your state permit application for the National Pollutant Discharge Elimination System (NPDES) General Permit for Water Treatment Facility Discharges. Environmental Partners will send a revised copy of Table 1 with a corrected TSS concentration for the north lower lagoon. With that change, I have reviewed the BRP WM 13 application for administrative completeness and determined that all the application requirements have been fulfilled.

NPDES/Surface Water Discharge Permits are issued jointly by MassDEP and the U. S. Environmental Protection Agency (US EPA). EPA expects to issue a new general permit for water treatment plant discharges in 2006. Until that time, the monitoring requirements will be included in the operating plans for the lagoon system required in the pending ACOP. When the new draft general permit is issued, you will have an opportunity to review the conditions of the permit and meet any new requirements. EPA will send written confirmation of coverage.

If you have any questions, please feel free to call me at 508-767-2856 or email kathleen.keohane@state.ma.us.

Very truly yours,

Kathleen Keohane
Kathleen Keohane
Environmental Engineer

Cc: Paul Hogan
Olga Vergara/EPA
Steven Olson/Environmental Partners

This information is available in alternate format by calling our ADA Coordinator at (617) 574-6872.

<http://www.state.ma.us/dep> • Phone (508) 792-7470 • Fax (508) 791-4131

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Appendix B

U.S. Fish and Wildlife Service Trust Resources List



U.S. Fish and Wildlife Service

Trust Resources List

This resource list is to be used for planning purposes only — it is not an official species list.

Endangered Species Act species list information for your project is available online and listed below for the following FWS Field Offices:

New England Ecological Services Field Office
70 COMMERCIAL STREET, SUITE 300
CONCORD, NH 3301
(603) 223-2541
<http://www.fws.gov/newengland>

Project Name:

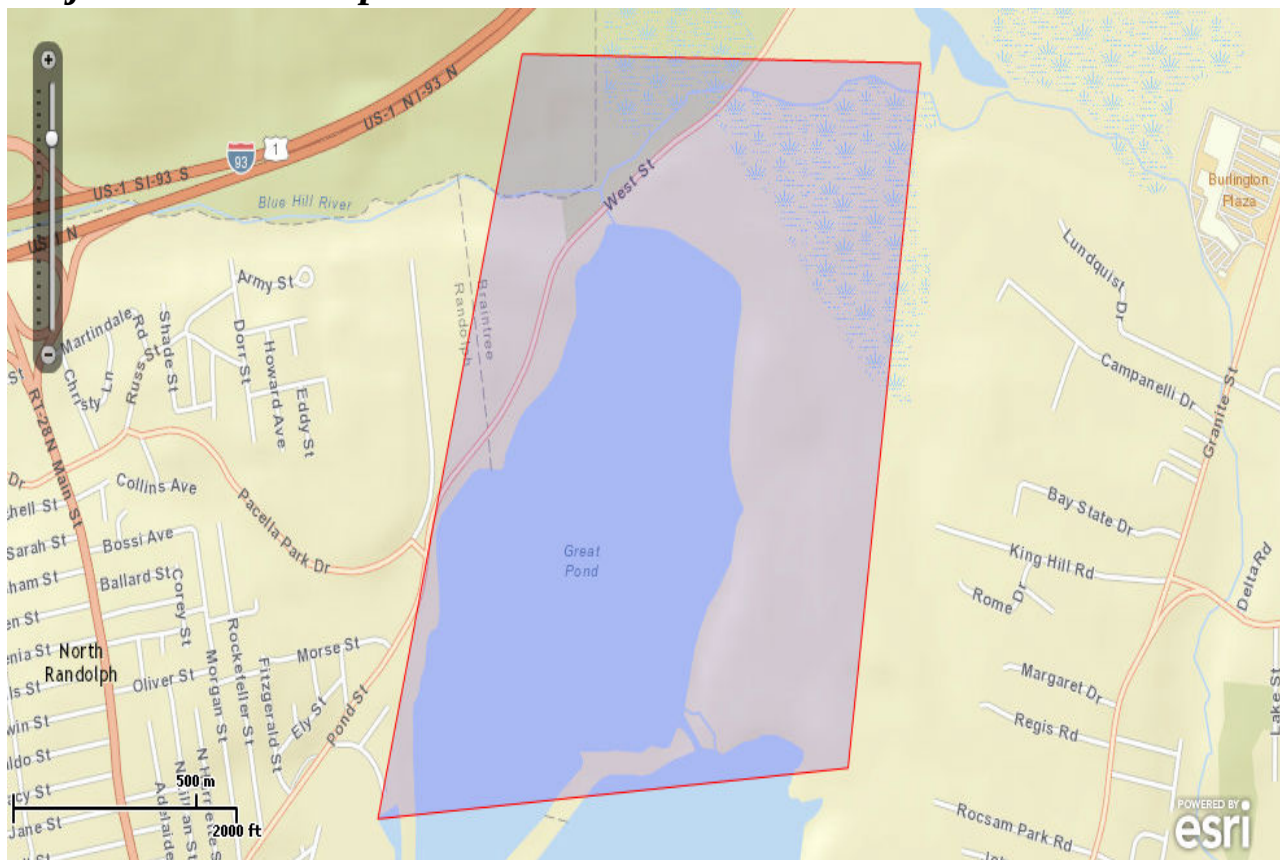
Braintree GPWTP - NPDES



U.S. Fish and Wildlife Service

Trust Resources List

Project Location Map:



Project Counties:

Norfolk, MA

Geographic coordinates (Open Geospatial Consortium Well-Known Text, NAD83):

MULTIPOLYGON (((-71.0473293 42.2090565, -71.0341436 42.2088785, -71.0365534 42.1954388, -71.0521059 42.1944691, -71.0473293 42.2090565)))

Project Type:

Water Supply / Delivery



Trust Resources List

Endangered Species Act Species List ([USFWS Endangered Species Program](#)).

There are no listed species found within the vicinity of your project.

Critical habitats within your project area:

There are no critical habitats within your project area.

FWS National Wildlife Refuges ([USFWS National Wildlife Refuges Program](#)).

There are no refuges found within the vicinity of your project.

FWS Migratory Birds ([USFWS Migratory Bird Program](#)).

The protection of birds is regulated by the Migratory Bird Treaty Act (MBTA) and the Bald and Golden Eagle Protection Act (BGEPA). Any activity, intentional or unintentional, resulting in take of migratory birds, including eagles, is prohibited unless otherwise permitted by the U.S. Fish and Wildlife Service (50 C.F.R. Sec. 10.12 and 16 U.S.C. Sec. 668(a)). The MBTA has no provision for allowing take of migratory birds that may be unintentionally killed or injured by otherwise lawful activities. For more information regarding these Acts see <http://www.fws.gov/migratorybirds/RegulationsandPolicies.html>.

All project proponents are responsible for complying with the appropriate regulations protecting birds when planning and developing a project. To meet these conservation obligations, proponents should identify potential or existing project-related impacts to migratory birds and their habitat and develop and implement conservation measures that avoid, minimize, or compensate for these impacts. The Service's Birds of Conservation Concern (2008) report identifies species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become listed under the Endangered Species Act as amended (16 U.S.C 1531 et seq.).

For information about Birds of Conservation Concern, go to <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Management/BCC.html>.

Migratory birds of concern that may be affected by your project:

There are 8 birds on your Migratory birds of concern list. The Division of Migratory Bird Management is in the process of populating migratory bird data with an estimated completion date of August 1, 2014; therefore, the list below may not include all the migratory birds of concern in your project area at this time. While this information is being populated, please contact the Field Office for information about migratory birds in your project area.



Trust Resources List

Species Name	Bird of Conservation Concern (BCC)	Species Profile	Seasonal Occurrence in Project Area
Audubon's Shearwater (<i>Puffinus lherminieri</i>)	Yes	species info	Wintering
Black Skimmer (<i>Rynchops niger</i>)	Yes	species info	Breeding
Canada Warbler (<i>Wilsonia canadensis</i>)	Yes	species info	Breeding
Least Bittern (<i>Ixobrychus exilis</i>)	Yes	species info	Breeding
Purple Sandpiper (<i>Calidris maritima</i>)	Yes	species info	Wintering
Snowy Egret (<i>Egretta thula</i>)	Yes	species info	Breeding
Wood Thrush (<i>Hylocichla mustelina</i>)	Yes	species info	Breeding
Worm eating Warbler (<i>Helmitheros vermivorum</i>)	Yes	species info	Breeding

NWI Wetlands ([USFWS National Wetlands Inventory](#)).

The U.S. Fish and Wildlife Service is the principal Federal agency that provides information on the extent and status of wetlands in the U.S., via the National Wetlands Inventory Program (NWI). In addition to impacts to wetlands within your immediate project area, wetlands outside of your project area may need to be considered in any evaluation of project impacts, due to the hydrologic nature of wetlands (for example, project activities may affect local hydrology within, and outside of, your immediate project area). It may be helpful to refer to the USFWS National Wetland Inventory website. The designated FWS office can also assist you. Impacts to wetlands and other aquatic habitats from your project may be subject to regulation under Section 404 of the Clean Water Act, or other State/Federal Statutes. Project Proponents should discuss the relationship of these requirements to their project with the Regulatory Program of the appropriate [U.S. Army Corps of Engineers District](#).

Data Limitations, Exclusions and Precautions

The Service's objective of mapping wetlands and deepwater habitats is to produce reconnaissance level information on the location, type and size of these resources. The maps are prepared from the analysis of high altitude imagery. Wetlands are identified based on vegetation, visible hydrology and geography. A margin of



Trust Resources List

error is inherent in the use of imagery; thus, detailed on-the-ground inspection of any particular site may result in revision of the wetland boundaries or classification established through image analysis.

The accuracy of image interpretation depends on the quality of the imagery, the experience of the image analysts, the amount and quality of the collateral data and the amount of ground truth verification work conducted. Metadata should be consulted to determine the date of the source imagery used and any mapping problems.

Wetlands or other mapped features may have changed since the date of the imagery and/or field work. There may be occasional differences in polygon boundaries or classifications between the information depicted on the map and the actual conditions on site.

Exclusions - Certain wetland habitats are excluded from the National mapping program because of the limitations of aerial imagery as the primary data source used to detect wetlands. These habitats include seagrasses or submerged aquatic vegetation that are found in the intertidal and subtidal zones of estuaries and nearshore coastal waters. Some deepwater reef communities (coral or tubercid worm reefs) have also been excluded from the inventory. These habitats, because of their depth, go undetected by aerial imagery.

Precautions - Federal, state, and local regulatory agencies with jurisdiction over wetlands may define and describe wetlands in a different manner than that used in this inventory. There is no attempt, in either the design or products of this inventory, to define the limits of proprietary jurisdiction of any Federal, state, or local government or to establish the geographical scope of the regulatory programs of government agencies. Persons intending to engage in activities involving modifications within or adjacent to wetland areas should seek the advice of appropriate federal, state, or local agencies concerning specified agency regulatory programs and proprietary jurisdictions that may affect such activities.

The following wetland types intersect your project area in one or more locations:

Wetland Types	NWI Classification Code	Total Acres
Freshwater Emergent Wetland	PEM1E	34.754
Freshwater Emergent Wetland	PEM1Fh	2.258
Freshwater Forested/Shrub Wetland	PSS1E	45.686
Freshwater Forested/Shrub Wetland	PFO1E	59.0994
Freshwater Pond	PUBHh	7.1831
Freshwater Pond	PUB/EM1Fh	3.3772
Lake	L1UBHh	410.7622