



TAUNTON RIVER WATERSHED ALLIANCE

A VOICE FOR THE RIVER SINCE 1988

January 30, 2024

Michael Cobb
U.S. Environmental Protection Agency – Region 1
5 Post Office Square, Suite 100 (06-4)

Via email: Cobb.Michael@epa.gov

RE: Comments on Draft Somerset **NPDES Permit No. MA0100676**

Dear Mr. Cobb:

The Taunton River Watershed Alliance (TRWA) supports the issuance of the draft Somerset Permit (NPDES Permit No. MA0100676). We note that the last time this permit was reissued was May 14, 2004 making this action long overdue. After careful review we believe that the permit limitations and conditions as well as the Fact Sheet description of the technical and legal justification for the permit terms and conditions are well reasoned and consistent with the Clean Water Act (CWA).

We hope that at the conclusion of the public comment period on February 5, 2024 EPA Region 1 promptly responds to all comments and reissues this important permit. It is important to note that TRWA supports this draft permit as proposed and does not believe that its conditions may be made less stringent and still comply with the CWA.

We support the total nitrogen effluent limitation of 175 lbs/day based on a concentration of 5 mg/l. [TRWA monthly monitoring](#) of upstream waters in the watershed indicates a need to reduce nitrogen loads to the Taunton River estuary and Mount Hope Bay. As described in the permit Fact Sheet on pages 29 and 30, MassDEP continuous monitoring buoys in Mount Hope Bay and the mouth of the Cole River demonstrate low dissolved oxygen, high chlorophyll-a and show that at least 10% of the nitrogen samples demonstrate levels in Mount Hope Bay above the impairment listing target of total nitrogen (TN) 0.5 mg/L.

TRWA supports the adaptive management approach to nitrogen effluent limitations described on page 37 of the Fact Sheet. "EPA highlights that adaptive management is beneficial because it allows for expeditious application of nitrogen reductions in the short-term (in this case, down to 5 mg/L) and the potential for further reductions in the long-term (down to 3 mg/L) as necessary based on observed water quality impacts." *Underline added.* We want to note that any facility Somerset constructs should be designed so that it can be operated to achieve lower TN levels if further monitoring in Mount Hope Bay indicates that this is necessary (such as by adding a carbon source). We want to highlight the language on page 38 of the Fact Sheet, "Finally, EPA anticipates another significant load reduction from the Fall River WWTF when its permit is renewed in the near future." *Underline added.* TRWA strongly agrees that it is important to renew the Fall River permit with a nitrogen effluent limitation in the near future.

Our Mission: ...to protect and restore the watershed's natural resources for current and future generations.

Taunton River Watershed Alliance, at Sweets Knoll State Park, 1387 Somerset Ave., (Rt. 138), Dighton
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In light of the more intense storms and flooding we are seeing in the watershed as a result of climate change, we support the Adaptation Planning requirements in Special Condition C.1 of the permit.

We support the schedule for providing facilities to meet the total nitrogen effluent limitations in Special Condition G.1 and 2. In particular G.1.e., "Within four years of the effective date of the permit, the Permittee shall substantially complete construction of the facility improvements required to achieve the new total nitrogen permit limit."

In light of the pervasive PFAS levels in water supplies and ground water in the watershed we support the monitoring for PFAS Analytes and Adsorbable Organic Fluorine. Part 1. A. 1. and Appendix C.

Since 1988, TRWA has been a voice for the 562 square mile Taunton River watershed, an advocate for environmental protection, sustainable development, and responsible stewardship of our precious water resources. We are an Alliance of concerned residents, businesses, and organizations united to restore and properly manage water and related natural resources within the Taunton River Watershed.

Thank you for considering these comments.

Sincerely,



Joseph Callahan
President

cc by email:

Ken Moraff, Director Water Division, EPA Region 1
Ellen Weitzler, Industrial and Municipal Permits Section Supervisor, EPA Region 1
Bonnie Heiple, Commissioner MassDEP
Topher Hamblett, Save The Bay
Michael Jarbeau, Save The Bay
Kate McPherson, Save The Bay
Kendra Beaver, Save The Bay
Julia Blatt, Massachusetts Rivers Alliance
Katharine Lange, Massachusetts Rivers Alliance
Heidi Ricci, Massachusetts Audubon
Alison Bowden, The Nature Conservancy
Jamie Fosburgh, National Park Service, Wild and Scenic River Program
Lauren Bonatakis, National Park Service, Wild and Scenic River Program
Richard Carey, Director Watershed Planning MassDEP
Danica Belknap, Southeastern Regional Planning & Economic Development District