



MASSACHUSETTS WATER RESOURCES AUTHORITY

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October 23, 2009

Glenn Haas, Acting Assistant Commissioner Bureau of Resource Protection Massachusetts Department of Environmental Protection 1 Winter Street Boston, MA 02108	Stephen Perkins, Director Office of Ecosystem Protection U.S. Environmental Protection Agency Water Technical Unit "SEW" P.O. Box 8127 Boston, MA 02114
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Re: Massachusetts Water Resources Authority, Permit Number MA0103284
Submission Pursuant to Part I.7.c.i. - Ambient Monitoring Plan Modifications

Dear Mr. Haas and Mr. Perkins:

This letter is a follow-up to the Massachusetts Water Resources Authority's ("MWRA") letter of April 15, 2009 which requested interim modifications to its outfall Ambient Monitoring Plan. The Environmental Protection Agency ("EPA") rejected the request for interim modifications (letter dated April 24, 2009), but agreed to consider the request using the annual review process.¹ EPA gave preliminary comments to MWRA's list of proposed changes in a letter on June 3, 2009. The Outfall Monitoring Science Advisory Panel ("OMSAP") met on July 29, 2009 to review MWRA's request and again by teleconference on August 18, 2009. OMSAP voted to recommend approval of the proposed changes to the benthic monitoring plan, as well as several changes to the water column monitoring plan, but postponed voting on the changes to the water column sampling schedule and sampling stations. OMSAP requested additional analyses to compare methods for enumeration of *Alexandrium*, and suggested MWRA use modeling methods to estimate productivity in lieu of laboratory measurements.

MWRA also received comment letters from MA Coastal Zone Management (July 2 2009), the Provincetown Center for Coastal Studies (June 15, 2009), and the Stellwagen Bank National Marine Sanctuary (October 5, 2009).

¹ Part I.7.c.i. of MWRA's NPDES permit states: "By November 15 of each year the permittee shall submit a list of any proposed modifications to the monitoring plan...."

Based on those and other comments, MWRA has revised its earlier, interim, list of requested modifications and hereby is submitting its annual list of proposed modifications to the *Ambient Monitoring Plan for the Massachusetts Water Resources Effluent Outfall, Revision 1, March 2004* pursuant to Part 1.7.c.i of the Massachusetts Water Resources Authority's ("MWRA") National Pollutant Discharge Elimination Program ("NPDES") Permit (Permit Number MA0103284). The new list and the proposed *Ambient Monitoring Plan for the Massachusetts Water Resources Effluent Outfall Revision 2, Draft 2 MWRA Report 2009-15* are attached to this letter for regulatory and public review. Briefly, the proposed revised plan now includes monitoring at stations in Cape Cod Bay and at the southern boundary of Stellwagen Bank NMS. Analyses comparing methods for enumerating *Alexandrium* are presented.

EPA has requested that OMSAP evaluate the need for a nearfield station at the edge of the zone of initial dilution. MWRA believes that the abundant data already available coupled with the dye-dilution study have thoroughly addressed questions of how the effluent plume behaves. Nevertheless, if the regulatory agencies require monitoring at the edge of the 60-meter zone around the outfall, MWRA's list of proposed changes and draft ambient monitoring plan suggest a nearfield sampling location and parameters.

The proposed plan and related documents can be retrieved from MWRA's website at: <http://www.mwra.state.ma.us/harbor/enquad/trlist.html> and <http://www.mwra.state.ma.us/harbor/html/whatsnew.htm>.

MWRA looks forward to review and discussion of its annual request for modifications at the next OMSAP meeting. If you have any questions or need any additional information please contact me at (617) 788-4359.

Yours truly,



Michael J. Hornbrook
Chief Operating Officer, MWRA

Two attachments:

2009 Annual List of Proposed Changes to MWRA's Effluent Outfall Ambient Monitoring Plan

Proposed Ambient Monitoring Plan for the Massachusetts Water Resources Effluent Outfall Revision 2 Draft 2 MWRA Report 2009-15