



*Presentation to*

## **MWRA Advisory Board**

Deer Island Wastewater Treatment Plant Draft National  
Pollutant Discharge Elimination System (NPDES) Permit

Betsy Reilley, Ph.D.  
Director, Environmental Quality

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# Draft Deer Island NPDES Permit Issued

- On May 31 EPA issued a draft NPDES Permit for the Deer Island Treatment Plant
- This permit also authorizes discharges from CSOs
- All 43 connected community sewer system communities are named as co-permittees in this permit. The 4 CSO communities are “CSO-responsible” co-permittees.

NPDES Permit No. MA0103284

2023 Draft Permit

**AUTHORIZATION TO DISCHARGE UNDER THE  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM**

In compliance with the provisions of the Federal Clean Water Act as amended, 33 U.S.C. §§ 1251 et seq. (the “CWA”).

Massachusetts Water Resource Authority (MWRA)

is authorized to discharge from the facility located at

**MWRA Deer Island Treatment Plant (DITP)**  
190 Tafts Avenue  
Winthrop, MA 02152

to the receiving water named

Receiving Water	Segment	Outfall
Massachusetts Bay	Undefined, 314 CMR 4.06, Table 23	T01

and

**Four (4) Combined Sewer Overflow (CSO) Treatment Facilities with 5 outfalls  
to the receiving waters named**

Receiving Water	Segment	CSO Treatment Facility Name	Outfalls
Boston Inner Harbor	MA70-02	Prison Point	MWR203
Boston Inner Harbor	MA70-02	Union Park	MWR215
Mystic River	MA71-03	Somerville Marginal	MWR205
Upper Mystic River	MA71-02	Somerville Marginal	MWR205A
Charles River	MA72-38	Cottage Farm	MWR201

and

**Six (6) additional Combined Sewer Overflow (CSO) Outfalls (See Attachment A)**

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.



# Process

- The public comment period is 90 days, through August 30.
- Staff are reviewing the permit to assess impacts to MWRA operations, compliance, and budget.
- MWRA will submit comments on the draft permit. Submitting comments is required in order to:
  - Request certain elements of the permit changed
  - Retain right to appeal





# Important Elements of the Draft Permit for Co-Permittees

- Reporting requirements for unauthorized discharges (which include Sanitary Sewer Overflows)
- Requirements for backup power.
- Operations and Maintenance (O&M) requirements for each respective collection system, including infiltration/inflow (I/I) reduction programs, updating existing O&M plans, and annual reporting ; and
- New requirement for “Major Storm Event Plans” and reporting on their implementation
- “CSO Responsible” Co-Permittees have additional requirements



# Important Elements of the Draft Permit for Co-Permittees

- **Operations and Maintenance (O&M) requirements**
  - 6 mos – O&M Plan schedule for development of a full O&M Plan
  - 24 mos – submit full O&M Plan
  - 30 mos – submit sewer system map
  - Update Annually (with Sewer System Major Storm and Flood Events Plan report)
- **“Sewer System Major Storm and Flood Events Plan”**
  - Within 12 mos, “develop and submit a “Flood Events Plan” and begin implementation of mitigation measures
    - Asset vulnerability
    - Systemic vulnerability
    - Alternatives analysis (and select mitigation measures to implement)
  - Include Resiliency Planning and implementation, consider future conditions; 20-30 yrs and 80-100 yrs, and extreme sea level change.
  - Update every 5 years.
  - Report on Progress of implementation annually (with O&M Reporting)
  - Identify funding



# Considerations

- Required Timelines
- Level of Effort
- Costs / Funding
- Overly Prescriptive
- Duplicative requirements
- Is your system prone to flooding?
- Plans must be developed by a “qualified” person
- Comments from others (Holyoke, NACWA, etc)
- Legal Authority



## Other requirements with significant costs for MWRA

- Major Storm Event Planning
- Monitoring for Harmful Algal Blooms
- Expanded PFAS Monitoring
- Disinfection and dechlorination for seasonal Enterococcus
- Dye Studies for CSO Outfalls (1x)
- Video Inspection of Deer Island Outfall (every 5 yrs)
- Costs for Co-permittees (x43)





## Next Steps

- EPA will hold a Public Briefing and Public Hearing July 12<sup>th</sup>
- Staff to prepare and submit comments by August 30
- EPA must develop a response to every comment received
- No set time period to finalize permit





## Resources – Flood Planning, Permit

[Flood Resilience: A Basic Guide for Water and Wastewater Utilities, September 2014 \(epa.gov\)](#)

[https://www.epa.gov/sites/default/files/2015-08/documents/flood\\_resilience\\_guide.pdf](https://www.epa.gov/sites/default/files/2015-08/documents/flood_resilience_guide.pdf)

<https://www.epa.gov/crwu>

The Permit and related files: <https://www.epa.gov/npdes-permits/epas-permit-massachusetts-water-resources-authority-mwra-deer-island-treatment-plant>



Questions?