



Michele Barden
U.S. Environmental Protection Agency – Region 1
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Email: barden.michele@epa.gov

Re: NPDES Draft Permit No. MA0103284 for [the Massachusetts Water Resources Authority Deer Island Treatment Plant and accompanying fact sheets

Dear Ms. Barden:

The Wastewater Advisory Committee to the MWRA consists of 13 volunteer members from various sectors interested in the regional sewer system and its effects. We usually meet from September through June on the first Friday of the month.

The May 31 issuance of the draft Deer Island permit thus puts us, and probably other mostly-volunteer environmental and civic groups, at a disadvantage. While we have anticipated this permit for several years, the actual contents of it will require careful review by our members on their personal time. Our last regularly scheduled meeting was June 2—just days after the draft was issued.

Besides individual review time, WAC is required to meet in public session to review our data and conclusions, agree upon comments and then refine and edit these before submission. We really should have at least two meetings for this discussion in order to be fully transparent and deliberative. Vacation schedules will also interfere.

To elicit the most thoughtful comments from the widest array of non-profit and volunteer groups, therefore, WAC respectfully asks that EPA extend the deadline for comment to October 31. This extension will allow WAC and other groups, such as the all-volunteer Outfall Monitoring Science Advisory Panel, to schedule and convene well-attended meetings to prepare comments on this long-awaited draft.

Thank you for the opportunity to participate in this process.

Wayne Chouinard
Chairman,
Wastewater Advisory Committee to the MWRA

*WAC is a citizens' advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations.*¹ | Page