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May 12, 2023

Michele Duspiva

U.S. Environmental Protection Agency – Region 1
5 Post Office Square, Suite 100 (06-4)
Boston, MA 02109-3912

Submitted via electronic mail: duspiva.michele@epa.gov

Re: NACWA Comments on the U.S. Environmental Protection Agency Region 1's Draft National Pollutant Discharge Elimination System Permit Issued for the Town of Montague Clean Water Facility and CSOs and Co-Permittee Town of Gill (Permit No. MA0100137).

Dear Ms. Duspiva:

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to provide comments to the U.S. Environmental Protection Agency (EPA) Region 1's draft National Pollutant Discharge Elimination System (NPDES) permits issued to various Publicly-Owned Wastewater Treatment Works (POTWs) operating in Massachusetts.

NACWA represents the interests of over 350 municipal clean water utilities of all sizes across the United States including municipal wastewater utilities in Massachusetts. Our members are anchor institutions in their communities that everyday provide essential service of treating billions of gallons of our nation's wastewater and stormwater in a manner that ensures the continued protection of public health and the environment – this includes taking various voluntary steps to improve their overall climate resiliency.

We object to the EPA Region 1's National Pollutant Discharge Elimination System (NPDES) permit issued for the Town of Montague, Massachusetts. We object to the permit's new requirements set forth in Section C (1)(a) that mandates a utility develop, submit, and begin to implement a *Wastewater Treatment Major Storm and Flood Events Plan* as well as the requirements set forth in Section C(2)(e)(x) mandating utilities to develop, submit, and begin implementing a *Sewer System Major Storm and Flood Events Plan* as an element of the *Sewer System Operations and Maintenance Plan*.

NACWA recognizes and supports the comments made by the Massachusetts Water Resources Authority in a separate but similar individual permit issued by EPA Region 1 (*i.e.*, the draft Northampton Wastewater Treatment Plant NPDES Permit MA0101818) as they apply to the permit at issue.

NACWA Comments on EPA Region 1's Draft Permit MA0100137
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If there are questions, please contact Emily Remmel, NACWA's Director of Regulatory Affairs by email at eremmel@nacwa.org or by phone at 202/533-1839.

Sincerely,

A handwritten signature in black ink, appearing to read "Emily Remmel". The signature is fluid and cursive, with the first name "Emily" being more prominent than the last name "Remmel".

Emily Remmel