

July 9, 2014

Shauna Little
U.S. Environmental Protection Agency
5 Post Office Square
Suite 100, Mail code OEP06-1
Boston, Massachusetts 02109-3912

Re: U.S. Environmental Protection Agency Individual NPDES Draft Permit
No. MA0003531, Bird, Inc. d/b/a CertainTeed Corporation, Norwood, MA
(Division of Saint-Gobain)

Dear Ms. Little,

On May 30, 2014, the U.S. Environmental Protection Agency posted a draft of NPDES Permit No. MA0003531 for the CertainTeed manufacturing plant at 1077 Pleasant Street in Norwood, MA. The draft permit has been reviewed by the CertainTeed and Saint-Gobain Environmental, Health and Safety team and the following comments are hereby submitted:

Outfall 001:

- Part I.A.1 Table 1 indicates that flow rate monitoring at this outfall has been changed from weekly to continuous. Footnote #4 states that flow rate data should be collected once a week on the same day and time each week. The frequency of continuous flow rate monitoring is not defined. We request that “continuous monitoring” be defined as one data point per hour.

Outfall 002:

- Part I.A.2, Table 2 includes monthly sampling requirements for pH and Total Suspended Solids. Outfall 002 occurs after a control device with a significant dwell time and recharging substantially to groundwater without discharging. There has not been a discharge at this outfall since 2012. Based on the operations and maintenance of the area that has the ability to discharge to this Outfall, there may never be another discharge. Accordingly, we request the sampling frequency be changed to “when a discharge occurs.”

- Part I.A.2, Table 2 includes a requirement to collect a composite sample for Total Suspended Solids. Due to the limited discharge duration at this outfall we request that this sample requirement be changed to a grab sample and only when a discharge occurs.
- There is a typo in footnote #4 which indicates that flow in this outfall is metered. This statement contradicts the sampling requirements in Table 2 and the last sentence of footnote #4 which states that the flow rate for this outfall shall be an estimate.
- The draft NPDES permit contains an average monthly limit of 20 mg/L and a maximum daily limit of 30 mg/L for TSS at Outfall 002. However, Outfall 001 has an average monthly limit of 40 mg/L and a maximum daily limit of 70 mg/L. In addition, there has not been a discharge from Outfall 002 since 2012. CertainTeed has performed maintenance in the area that leads to Outfall 002 further reducing the likelihood of any discharges. We find no design data or historical record that supports these lower limits. We believe the original limits to have been established in error. Further the derived BPT and BAT for Outfall 001 support a higher TSS limit. We request the TSS limit for Outfall 002 be changed to be equal to Outfall 001.

Outfall 003

- Part I.A.3, Table 3 requires composite samples for Total Suspended Solids and Phosphorous. We request that all sampling requirements for this outfall be changed to grab samples “when a discharge occurs.” This outfall is a manually initiated discharge.
- Part I.A.3, Table 3 requires that flow rate be measured with a meter. The pump for this outfall is designed for a maximum flow rate of 20 gpm. We request that the requirement to add a meter to this outfall be removed.
- The draft NPDES permit contains a maximum daily limit of 15 mg/L for TSS at Outfall 003. However, Outfall 001 has a maximum daily limit of 70 mg/L. We find no design data or historical record that supports these lower limits. We believe the original limits to have been established in error. Further the derived BPT and BAT for Outfall 001 support a higher TSS limit. We request the TSS limit for Outfall 003 be changed to be equal to Outfall 001.

Outfall 004

- Part I.A.4, Table 4 requires composite samples for Total Suspended Solids and Phosphorous. We request that all sampling requirements for this outfall be changed to grab samples “when a discharge occurs.” This outfall is a manually initiated discharge.

- Part I.A.4, Table 4 requires that flow rate be measured with a meter. The pump for this outfall is designed for a maximum flow rate of 100 gpm. We request that the requirement to add a meter to this outfall be removed.
- Part I.A.4, Table 4 shows the maximum daily flow rate as 20 gpm. We believe this is a typographical error and should be changed to 100 gpm as the pump and oil/water separator are designed for a maximum flow rate of 100 gpm and Section 7.3.1 of the Fact Sheet correctly states the treatment capacity of the oil/water separator for Outfall 004 as 100 gpm. We request that the flow rate requirement be changed to 100 gpm.
- The draft NPDES permit contains a maximum daily limit of 15 mg/L for TSS at Outfall 004. However, Outfall 001 has a maximum daily limit of 70 mg/L. We find no design data or historical record that supports these lower limits. We believe the original limits to have been established in error. Further the derived BPT and BAT for Outfall 001 support a higher TSS limit. We request the TSS limit for Outfall 004 be changed to be equal to Outfall 001.

Whole Effluent Toxicity Test

- There are discrepancies between the sampling requirements in the tables and in the footnotes. Footnote #17 includes WET test sampling requirement for antimony, iron, manganese, chromium, calcium, magnesium and phosphorus. These sampling requirements are not included in Tables 1 and 2 in Part I A of the draft permit. Additionally, aluminum sampling is listed in Tables 1 and 2 in Part I A, but is not listed in footnotes # 16 or # 17. Please provide clarification on these sampling requirements.

If you have any questions please do not hesitate to call me at (781)-278-0444.

Sincerely,

Patrick Widman
Plant Manager
CertainTeed RPG
Norwood, MA 02062