Comment related to Comment J3 from WCE:

These data was collected when Shell was pumping groundwater from under the site and comingling that groundwater with storm water and then treating and then discharging this co-mingled stream into the river. As such the data presented above have no bearing on the operation of the stormwater system as it exists and is permitted to be operated today and as it is proposed to be operated under the terms of the new permit. The water quality data cited above were also collected when the petroleum distribution terminal was in active use. The terminal has not been in active use since the mid-1990's. To suggest that the site should be regulated as if it were an active oil terminal, as suggested by Ms. Phillips has no basis in fact or precedent. At the time the data referenced by the commenter were collected, ships bearing petroleum products were calling at the facility delivering product. Trucks were calling at the facility and hauling product away. The tanks were storing product. Pipes on the site were moving product. Valves on the site were controlling product. Today the operation of the site is drastically different. All the tanks on the site have certificates showing that they have been emptied and scrubbed cleaned of all petroleum products and are ready for demolition. Since the mid 1990's no petroleum products have been received by ship, removed by truck, or stored in the tanks located on the site. In addition Weaver's Cove has no right today to store petroleum products in the tanks on the site as all of the permits issued by federal and state authorities required to support the storage and handling of petroleum products expired and lapsed many years ago. All of the control systems associated with the terminal and much of the piping and valving have been removed. The dock would need to be rebuilt as it has rotted.

Response to the City's Comment J3 and WCE's related comment:

See EPA's responses above to the City's Comments B1 and B2 and to WCE's comments related to the City's comments. In those responses, EPA has already addressed very similar comments about the site conditions that existed in 1992 and the various issues and uncertainties associated with and surrounding the question of whether and to what extent contaminated groundwater is infiltrating the facility's stormwater drainage system and being discharged into the Taunton River through Outfalls 001 and 004. EPA also noted earlier in its responses to the City's comments that many changes have occurred at the facility since 1992. EPA acknowledges that most of the petroleum storage tanks formerly on this site have been removed and the few remaining tanks have been emptied of product and cleaned out. The final permit includes monitoring for the parameters noted by the commenter along with a groundwater infiltration study, which should provide evidence from which the Agencies will be able to determine whether WCE's permit would need to be reopened to address any such groundwater infiltration.

Comment J4 from the City of Fall River:

At the City's request, in September 2007, EPA made a site visit in connection with a permit transfer from the Cashman entity to Weaver's Cove. During that site visit, the EPA

representative took photos of the existing stormwater system, including the existing oil water separator at Outfall 001 and made visual observations that are noted in a trip report dated November 27, 2007. In that trip report, the EPA representative also indicated there was a sheen at Outfall 004 as well as sheens in both oil water separators. I'd like that information to be considered.

Comment related to Comment J4 from WCE:

The water quality data collected during the time period show that the terminal was in full compliance with permit requirements. Oil water separators are designed to handle sheens. EPA did not express any concerns with regards to the slight sheen observed. There is only one oil water separator on the site and this has been the case for the past two decades. The facts presented above are not credible.

Response to the City's Comment J4 and WCE's related comment:

During EPA's 2007 inspection, photographs were taken of a containment structure upstream of Outfall 004, which apparently was not an oil/water separator. The permittee is correct that the oil/water separator that had previously been in operation for Outfall 004 was dismantled many years ago. It appears that the containment structure was also removed a few years ago when the permittee replaced some of the drainage structures and altered the routing of some of the drainage lines in the Outfall 004 drainage area.

Regardless of the sheen that was present in the oil water separator (OWS) for Outfall 001, EPA would expect a properly operating OWS to minimize the discharge of any detectable levels of petroleum hydrocarbons to the river. There have been several occasions of detectable levels of oil and grease at both outfalls (001 and 004); therefore there still appears to be some residual contamination in the storm drainage lines, which may include surface runoff from the site and possibly contaminated groundwater infiltrating the storm drainage system. Therefore, as earlier explained in great detail in EPA's responses to the City's Comments, e.g., Comments B1 and B5, and to WCE's related comments, in addition to the existing monitoring requirements for parameters associated with petroleum hydrocarbons, the final permit requires that the permittee conduct an investigation to determine whether there is groundwater infiltration occurring in the stormwater drainage system.

Comment J5 from the City of Fall River:

In addition, in our written comments submitted -- dated June 17, 2011, we also made reference to a report prepared by WCE as part of their MEPA application for the LNG facility. It was their proposal for how they were going to manage the site contamination during construction of the proposed LNG terminal, which has been withdrawn. But, in that document, an analysis concluded that there was a plume of LNAPL floating on the water table at the site approximately

30 acres in size. As of the date of that, October 18, 2005, it was estimated that the total volume of petroleum product in subsurface at the site, was 703,000 gallons. This is notwithstanding the fact that Shell had already removed 1,000,000 gallons approximately of oil from the site. That is a public record and part of the MEPA file, so I want to be sure that you have access to that.

During the period that Weaver's Cove has owned the property, it was determined that there was surficial soil contamination including arsenic at levels of 110 milligrams per kilogram or ppm found in surficial soils within one half foot of the surface in an area noted as Zone 3 in their site. This is significant because, this high level of arsenic in the surficial soil is the area where rainwater would come in contact and could possibly be washed out. And arsenic is toxic as we know. I'd like to submit for the -- and EPA has determined that arsenic is toxic. I'd like to submit for the file a copy of the Phase 1 initial site investigation and response action outcome report for RTM 4-19032 for Weaver's Cove Energy dated May 5, 2008.

Comment related to Comment J5 from WCE:

This issue was fully addressed in the MCP process. That process addresses pathways for migration of contamination. The site was determined to be in compliance with regulatory standards.

Response to City's Comment J5 and WCE's related comment:

EPA notes that there are two separate issues or circumstances relevant here, 1) the contamination in the groundwater at the site and 2) the contaminants found on the surface of the site. EPA notes that both of these issues have been addressed in detail by EPA in its responses above to the City's Comments B1 through B10 and WCE's related comments, and that EPA considered all of the relevant information in the record in deciding which terms and conditions should be contained in WCE's final permit.

In addition, EPA notes here in response to the City's assertion about surface contamination that the final permit's stormwater pollution prevention plan (SWPPP) requirement, detailed in Part C of the permit, requires the permittee to reduce, or prevent the discharge of pollutants into the receiving water. Therefore, the permittee must account for and address the drainage area of the entire site in developing its SWPPP, not only those drainage areas that are associated with the permitted outfalls. To the extent that historical data shows pollutants in the soils which have the potential to be carried into the receiving water with stormwater runoff, the permittee is required to explain the actions it will take, such as the implementation of Best Management Practices (BMPs), to minimize the transport of such pollutants to the receiving water, regardless of whether or not these portions of the site are drainage areas for outfalls.

Comment J6 from the City of Fall River:

I am submitting a copy of the April 2011 immediate response action completion report regarding the sheen on the river that was a reportable release from April 2010. And it describes, again, the data, the site history, what was done, and where, at least, this is -- this was prepared by Shell's LSP, I believe, it was Shell who took responsibility for the LNAPL in the river.

Comment related to Comment J6 from WCE:

The discharge in question occurred from the site but was not associated with Outfall 001 or 004. This discharge was from a six foot diameter hand laid brick sewer outfall that is owned and operated by the city of Fall River. The City of Fall River during routine rain events discharges raw untreated sewage from this outfall into the river. When it rains, toilet paper can be seen freely flowing into the river. The outfall pipe associated with this CSO is exposed at the river and is flushed with salt water from the Taunton River during every tidal cycle. There is no oil water separator associated with this sewer pipe. The City CSO pipe mentioned here is the subject of another NPDES permit issued to the City of Fall River. The City of Fall River controls discharges from the CSO. Weaver's Cove has no control over the operation of the CSO, the very CSO that created the sheen in the river. None of the pipes associated with Outfall 001 and 004 are several feet in diameter or constructed from hand laid brick like the CSO pipe. None of the pipes associated with Outfall 001 and 004 are flushed during each tidal cycle as is the case with the CSO.

Response to City's Comment J6 and WCE's related comment:

EPA has already responded in detail above to the various issues and circumstances associated with the April 2010 sheen on the Taunton River. See EPA responses to the City's Comment B4 and to WCE's related comment. See also EPA's response to CommentD1 above submitted by Ronald M. Thomas.

Comment J7 from the City of Fall River:

EPA did issue to Shell a discharge permit, an NPDES discharge permit in April 2011 for Outfall 001A. Outfall 001A is the outfall that, at the time it was operating, that Shell was using to discharge treated groundwater. So, this is groundwater that Shell has extracted as part of their remediation system. It goes through a treatment system and then is allowed to be discharged because it goes through the treatment system. Even though it had gone through a treatment system and was being allowed to be discharged, EPA found that certain effluent limits should be required on that discharge because the groundwater that was being treated, the effluent of the groundwater had high levels of certain contaminants in it. This is the same groundwater that the City contends is infiltrating the storm sewer system. So, EPA imposed what are called technology based effluent limits, which means, the level that there is good technology to treat water down to -- to be sure to remove the contaminants, we believe that these technology based

effluent limits that were imposed for the exact same site for treated groundwater should be imposed on a discharge of groundwater -- infiltrated groundwater to Weaver's Cove. They include arsenic, at 36 ppb, chromium, antimony, copper, lead, mercury, nickel, zinc and iron. It is our position that these specific effluent limits are equally applicable here, and there is no legal justification for not imposing them in this case.

In its Fact Sheet, EPA has stated that the reason these effluent limits were not changed from the 1978 permit, the stated reason was they felt they did not have sufficient amount of data and evidence to demonstrate, one, that contaminated groundwater was getting into the sewer system and two, what those contaminants were and what was likely to be discharged. It is our position that there are sufficient data in the record. It goes back to Shell's own initial application from 1983 and the re-application in 1992.

Comment related to Comment J7 from WCE:

This is the outfall discussed in comments above. This is the new outfall that was created to handle groundwater pumped from under the site by Shell. The flow that passes through Outfall 001A (permitted to Shell) used to flow through Outfall 001 when the site was owned by Shell. Since Shell sold the site well over a decade ago, Shell's groundwater flows have been redirected from Outfall 001 to Outfall 001A. Hence, it is clear that Outfall 001 has not discharged groundwater for well over a decade.

In 1982 and 1992 Outfall 001A did not exist. At those times (1983 and the re-application in 1992) Shell was comingling groundwater with stormwater and discharging both flows into the Taunton River through Outfall 001. Over a decade ago the design and operation of Outfall 001 was dramatically altered. For roughly a decade all groundwater pumped by Shell now passes through Outfall 001A which is permitted to Shell. Outfall 001 only discharges stormwater during rain events. Dry weather flows do not occur from Outfall 001 today. The commenter's request to impose a standard for groundwater on what today is only a stormwater discharge is both misleading and misplaced.

Response to the City's Comment J7 and WCE's related comment:

EPA believes that these comments in essence reiterate the same points submitted by the City and WCE in other comments, and that EPA has addressed and responded properly to all of the issues raised by the City and WCE in those comments. See EPA's responses to the City's Comments B1, B2, B5, B7, and B8, and to WCE's related comments.

Comment J8 from the City of Fall River:

It also goes to the information that Weaver's Cove submitted at EPA's request as part of its application, specifically, its 308 response. And even though that response was only based on isolated sampling, a small sample size, when coupled with the other data that exist for the site, and is well known and documented, both by Weaver's Cove and Shell, there -- in combination, EPA and MassDEP should not wait until the next renewal term to issue stricter effluent limits. There is no reason that more monitoring is required. There is an adequate legal basis to issue the effluent limits with the potential to emit here. And, in our view, there is no justification for the effluent limits that we believe are not strict enough in the Draft Permit. We would urge EPA and MassDEP to evaluate the data we have pointed out here and impose a stricter NPDES permit.

Comment related to Comment J8 from WCE:

The premise of this argument is flawed. Outfall 001 now only discharges stormwater. The data cited by Diane Phillips above is in no way representative of flows from the stormwater system today. Pump and treat groundwater today is handled by Shell under a separate permit issued to Shell for Outfall 001A and that permit is designed to address groundwater not stormwater. The Weaver's Cove permit under discussion in this forum should be based on stormwater and not groundwater standards. The above conclusions are not based on the flow conditions that exist today and are therefore flawed and should be ignored.

Response to City's Comment J8 and WCE's related comment:

EPA believes that these comments in essence reiterate the same points submitted by the City and WCE in other comments, and that EPA has addressed and responded properly to all of the issues raised by the City and WCE in those comments. See EPA's responses to the City's Comments B1, B2, B5, B7, and B8, and to WCE's related comments.

K. Comments submitted by Pauline Rodrigues and Joyce Mello

Comment K1:

I support the position of the City of Fall River as presented by Attorney Dianne Phillips that Weaver's Cove Energy should be held to a higher standard for the extension of the NPDES permit.

Response to Comment K1:

See EPA's responses to Dianne Phillips (The City's) Comments J1 through J8 above and to the City's comments in B1 through B10 above.

L. Testimony provided by Cecile Scofield. Also provided and responded to below are related comments on Cecile Scofield's testimony provided by Ted Gehrig of WCE:

Comment L1:

According to the Fact Sheet provided by US EPA, NPDES MA0004871 was transferred to Jay Cashman Inc. in 2003 and subsequently transferred to Weaver's Cove Energy LLC in 2007. I am hereby requesting that any NPDES permit for Outfalls 001 and 004 issued by the US EPA to Weaver's Cove Energy be issued under the same terms and conditions under which the permit was transferred to Jay Cashman Inc in 2003 as outlined herein.

Response to Comment L1:

As explained earlier, the Final Permit contains additional permit limits and monitoring requirements in addition to those of the 1978 permit issued to Shell Oil. When the last change of property ownership was conducted in 2007, WCE became the entity responsible for complying with this NPDES permit, which was originally issued to Shell. Although this permit had an expiration date prior to 2007, the permit was still valid and in effect at that time (having been administratively continued)because Shell had timely submitted its NPDES permit reapplication package as required in 1983.

Comment L2 from Cecile Scofield:

I have a letter from Shell Oil to Jay Cashman Incorporated dated January 14, 2003. "In accordance with condition 3D of the second amendment to the agreement for sale and purchase between Shell Oil Company, seller, and Jay Cashman Inc., purchaser, dated August 3, 2000, this letter provides written notification to Jay Cashman Inc. that, on December 5, 2002, Shell Oil Company rerouted all remediation discharged from Outfall 001 to Outfall 001A. Thus, effective December 5, 2002, Shell Oil Company is discontinuing use of and all discharges to Outfall 001. Jay Cashman Inc. shall assume all sampling, monitoring, management and reporting responsibilities, including the cost thereof for Outfall 001 effective January 1, 2003 in accordance with NPDES permit MA0004871." "To date, Outfall 004 has been sampled, monitored, managed and reported on by Shell Oil Company on behalf of Jay Cashman Incorporated." "This letter provides written notification that effective June 1, 2003, Jay Cashman Inc. shall assume all sampling monitoring, management and reporting responsibilities, including the cost thereof, for Outfall 004 in accordance with NPDES permit MA0004871."

Comment related to Comment L2 from WCE:

The important point here is that contaminated groundwater has not been discharged from Outfall 001 for over a decade. The methods used to handle groundwater discharges should be addressed

in the permitting process for those outfalls – these permits have been issued to Shell. Weaver's Cove has no control over the processing and handling of groundwater pumped from under the site that is owned by Weaver's Cove.

Response to Comment L2 and WCE's related comment:

See responses to Comments C2 and C3.

Comment L3:

I have a letter dated February 10, 2003 from the US EPA to Shell Oil, which specifically references page 2 paragraph 2. "We understand that the terminal proper has been sold to Jay Cashman Inc. and is now known as Fall River Marine Terminal. This includes Outfalls 001 and 004 under NPDES permit 0004871." "Thus, as we understand it, Shell is currently responsible for existing groundwater contamination and Jay Cashman for the marine terminal discharges 001 and 004 and any future potential contamination. Please advise if this is not correct." Next month, March 12, 2003, letter from Shell Oil to US EPA. "This letter is in response to the US EPA letter dated February 10, 2003 addressed to Shell Oil. Pursuant to Michael O'Brien's request, Shell is providing written documentation to the US EPA region that Jay Cashman Inc. is the current owner and operator of the Fall River Marine Terminal and therefore is environmentally responsible for Outfalls 001 and 004. Shell also verifies that all the information contained in page 2 paragraph 2 of your letter dated February 10, 2003 is accurate." Therefore, the Draft Permit must also enclose verbiage to the effect that Weaver's Cove Energy will be responsible for any future potential contamination. And I believe that failure to include such verbiage would frustrate Shell Oil Company's clear intent under the terms of the purchase and sales agreement.

Response to Comment L3:

As explained in the response to Comments B1 and B2, Outfalls 001 and 004 are permitted to WCE and Outfall 001A, which formerly discharged treated groundwater, is permitted to Shell Oil. The Agencies believe that this delineation of responsibilities is appropriate. It is not clear what the intention of the term "future potential contamination" was. At this time, Weaver's Cove is responsible for what is discharged through Outfalls 001 and 004. Although other commenters believe that groundwater is infiltrating the storm drainage system and being discharged through Outfalls 001 and 004, this has not been definitively shown. If it is determined during this permit term that contaminated groundwater is infiltrating the stormwater drainage system based on additional parameter monitoring in conjunction with the groundwater infiltration study, then such discharge would be the responsibility of WCE. Depending on the number and level of contaminants found or degree to which groundwater is infiltrating the storm drainage system, the Agencies could reopen the permit and impose additional permit limits which WCE would be responsible for complying with.

Comment L4:

Jay Cashman Inc. was not, in fact, the current owner and operator of the Fall River Marine Terminal in 2003. Jay Cashman had flipped the property to a newly formed limited liability company, Fall River Marine Terminal LLC in 2001, approximately three months after purchasing the site from Shell. Are there legal ramifications for failing to inform the US EPA that the property had been sold? Well, I'm not an attorney. However, in December of 2011, a complaint was filed by the Massachusetts Attorney General, the Commonwealth as plaintiff, against a Frank M Ward, et al, defendants, for violations of the Massachusetts Oil and Hazardous Materials Release Prevention and Response Act and its implementing regulations known as Massachusetts Contingency Plan (MCP). According to the complaint, the defendants willfully ignored regulatory deadlines for achieving the level of no significant risk to public health and the environment. And at the same time, misled the Commonwealth about the actual owner and operator of the property. Thereby impeding the Commonwealth's oversight and enforcement authority under state law.

In an Osterville, Massachusetts case, MassDEP Commissioner Kimmell said, "failure to fulfill your legal obligation to clean up a contaminated site is a serious offense. Submitting inaccurate documents to a government agency, brings that offense to an even more serious level." While it was believed that Jay Cashman Inc. remained as the permitee as operator until its transfer to Weaver's Cove Energy in 2007, Fall River Marine Terminal LLC was actually listed as the permitee on the discharge monitoring reports that were submitted to MassDEP and the US EPA from November of 2003 to December of 2006 with the exception of DMR's submitted in January and February and March of 2004 where the permitee was listed as Jay Cashman Inc.

Response to Comment L4:

See EPA's responses to comments C1, C2, and C3, above. As already noted, WCE is the current owner of this property and the entity to which this final NPDES permit should be issued under EPA's regulations. To the extent that the comment raises law enforcement related issues or questions, EPA does not believe, as indicated in earlier responses, that such issues affect the entity to whom the final permit should be issued or the permit's terms and conditions.

Comment L5:

A research of all areas of the US EPA database found no documents for Fall River Marine Terminal LLC. Other troubling questions raised by the discharge monitoring reports include wrong outflows listed. They all read 001A, which I think we learned this evening actually is Shell Oil's outflow. We have registered principal executive officers for two of the entities, actually, failed to sign -- the registered principal executive officer for two entities failed to sign the DMR's. That would be the only person who was -- who was authorized under Massachusetts law to sign those DMR's on behalf of the LLC. He didn't sign them. We have corporate officers

of these corporations that are not registered with the Secretary of State's Office. The LSP license, one signatory had been suspended during the period of all the DMR submittals. Under the comments section, one discharge monitoring report since September 2005 states, "samples taken but not submitted, but no visual nor olfactory evidence of concern." Are you kidding? Violations for this permit from May of 2009 to November 2011 include 22 code RNC's, reportable non-compliance, 11 code D80's, DMR, overdue monitoring only required. 11 code D90's, DMR overdue with numeric limits. One code D90 effluent violation, 22 code K's, non-receipt violation, non-monthly. Not sure what that means. And 18 code Y's, manual TRC. I'm not sure what TRC is. I tried to find out. Couldn't find it.

Response to Comment L5:

As EPA has already stated, to the extent that the comment raises law enforcement related issues or questions, EPA does not believe that such issues affect the entity to whom the final permit should be issued or the permit's terms and conditions. Within EPA Region 1, NPDES permit compliance is among the responsibilities implemented by the Office of Environmental Stewardship. That office has been provided with information for its consideration so that it may determine what, if any, actions might be appropriate.

Comment L6 from Cecile Scofield:

I believe another important issue is Weaver's Cove Energy's track record for demonstrating a lack of involvement in any matters pertaining to environmental contamination of the site. The first red flag was found in a footnote to Michael Bingham's September 16, 2004 letter to FERC. "Although Weaver's Cove apparently expects to submit a revised Phase 4 RIP to MassDEP to address system modifications, Weaver's Cove has not discussed any of the proposed plans with myself, the LSP of record, or with Shell, the responsible party under the existing RTN. And Weaver's Cove does not have authorization to modify the existing remedy on its own behalf."

On May 18, 2010, Weaver's Cove Energy was named as a potentially responsible party for a release on April 12, 2010. And again, on August 9, 2011 for release on June 28, 2011 with liability under MGL's Chapter 21E Section 5, liability with joint several, meaning Weaver's Cove Energy could be liable for all response action costs regardless of the existence of any other liable parties. Pursuant to 310 CMR 40.0300, each notice of responsibility gave WCE one year from the initial date of notification to file with MassDEP a completed tier classification submittal, an RAO statement, or if applicable, a down gradient property status. As of this writing, MassDEP advised that WCE had failed to prepare the required responses to any of these NOR's. A notation from MassDEP's reportable petroleum release log form for the June 28, '11 reads, "6-28-11, 1:20 p.m., arrived at the site. Met with Sovereign Consulting personnel. Ben Frothingham of Hess had no knowledge of release." Mr. Frothingham's is the EHS manager for WCE and he is the signatory on discharge monitoring reports filed on behalf of WCE. As an aside, some of those DMR's in the name of Weaver's Cove from March, April and May of '07 were not even signed.

Comment related to Comment L6 from WCE:

The facts here are simple. The City of Fall River is responsible for reporting outflow from the combined sewer outfall that they own and operate. They are responsible for signing all permit documents (including DMRs if any) associated with this particular outfall. Weaver's Cove is merely a landowner. The City holds a legal right to maintain and operate the CSO that passes under land owned by Weaver's Cove Energy.

Response to Comment L6 and WCE's related comment:

See EPA's earlier responses to Comments B3, B4, C4, and G2.

Also, EPA notes its position that the facts alleged in this comment (assumed to be true only for the purpose of this response) would not be relevant to WCE's NPDES permit proceeding in that they do not affect the entity to whom the permit should be issued and do not affect the terms and conditions of the permit itself.

WCE is not involved with the cleanup of historic petroleum releases at the site because the former owner, Shell, has assumed all responsibility for current MCP cleanup activities at the site. In addition to groundwater cleanup, it is EPA's understanding that Shell is undertaking all response actions associated with any sheen observed in the vicinity of the CSO outfall pipe, including those response actions required by the Notice of Responsibility issued by MassDEP to WCE and Shell on May 18, 2010.

Comment L7 from Cecile Scofield:

A meeting was held on March 14, 2011 to discuss the status of the April 10th release and sheen. Notes from Mr. Andrew Jones of MassDEP, Bureau of Waste Site Cleanup state, "met at site with D. Crafton, M.A. Hemberger from MassDEP, members of the US Coast Guard, Weaver's Cove and Shell. I asked Mr. Jones who represented Weaver's Cove at the meeting. He said that he didn't know, but that representatives attended the meeting briefly to find out what was going on. And they left when they found out what it was about. They didn't stay long," he said.

A representative from MassDEP felt that WCE wasn't participating in anything to do with the remediation of the site in order to avoid any potential liability. The representative also explained that, "per contractual agreements between WCE and Shell, Shell was doing the cleanup and that the environmental issues of the site were worked out behind the scenes." This alleged agreement appears to run contrary to Shell's commitment to perform the required mediation of the site associated with Shell's historical use pursuant to a Massachusetts requirement as outlined in the purchase and sale agreement. That would be the purchase and sale between Shell and Jay

Cashman Incorporated, not Shell and Fall River Marine or Fall River Marine and Weaver's Cove or any of these other documents.

Comment related to Comment L7 from WCE:

Weaver's Cove neither owns nor operates the outfall addressed by Ms. Scofield in the above paragraphs.

WCE owns the property!!

Response to Comment L7 and WCE's related comment:

See EPA's earlier responses to comments B4 and E1.

Also, EPA notes its position that the facts alleged in this comment (assumed to be true only for the purpose of this response) would not be relevant to WCE's NPDES permit proceeding in that they do not affect the entity to whom the permit should be issued and do not affect the terms and conditions of the permit itself.

Comment L8:

I have some issues with the Fact Sheet that was prepared for this evening. Section 1 under proposed action type of facility and discharge location. "This site is permitted for the storage of up to 64,000,000 gallons of petroleum product." Well, Schedule D to the deed recorded in December, again, based on the purchase and sale, assumed to reflect current and future development restrictions, "use of the premises by occupants shall not include storage, fabrication, assembling, processing, packaging or transport of oil or hazardous material." I hereby request that the Draft Permit be notated accordingly.

Response to Comment L8:

See response to comment J3. Although the Fact Sheet cannot be changed after the public comment period, this clarification is made for the record to acknowledge that most of the storage tanks previously on site have been removed and the remaining tanks have been emptied of product and cleaned.

Comment L9:

Section 3, receiving water description. The Taunton River impacted by the permit is a federally designated Wild and Scenic River and is protected under the protection of the US Department of the Interior National Park Service. In his November 10, 2010 letter to the Federal Energy Regulatory Commission (FERC), concerning a proposed offshore berth proposal and onshore storage facility, Mr. Dennis Reidenbach, Regional Director of the National Park Service said,

"contrary to the impression that Mr. Shearer's July 9, 2010 letter may leave, Weaver's Cove Energy made no effort to contact or consult with the National Park Service prior to his designing the project in early 2008." Mr. Reidenbach further stated, "unfortunately, agency attempts at these meetings to engage the applicant in discussion of alternatives and impact avoidance met with little success, and any attempt to discuss the site of the storage facility was met with the standard response that Weaver's Cove Energy considered the storage facility already approved by the FERC." "Ultimately, the NPS concluded, as did other state and federal agencies, that the applicant's purpose in holding the meetings was principally to craft a mitigation plan that it could and did submit to the FERC as having been based on agency feedback."

Response to Comment L9:

The National Park Service is the agency that oversees the "Wild and Scenic Rivers" program. An e-mail notification of the public notice draft and the notification of public hearing for this permit were provided to the Boston office of the National Park Service (NPS). There were no comments provided by NPS during either comment period. As already noted, WCE has abandoned plans for a LNG facility at this site.

Comment L10:

Section 6, explanation of permit's effluent limitations. "The discharge monitoring report data for Outfalls 001 and 004 for the reporting period of January '04 to June 2010 were reviewed for this permit reissuance. This time span covers discharge authorized to the former permitee, Jay Cashman as well as to Weaver's Cove." Please note that eight of the 36 DMR's filed from 2003 to 2006 for the permit actually list Fall River Marine Terminal LLC as the permittee. Are we surprised?

Response to Comment L10:

The record shows that there have been several changes of ownership of this property since the last permit was issued to Shell in 1978. Since the last transfer took place in 2007, a portion of the monitoring period that was evaluated did coincide with ownership by a former entity, which was referred to on DMRs as Fall River Marine Terminal LLC. Also see response to comment L5.

M. Testimony and written comments provided by Ann Morrill:

Comment M1:

The Kickemuit River Council (KRC), is an all volunteer organization, formed in 1973, a member and represents approximately 350 families in Bristol & Warren on the salt water Kickemuit River that flows into Mount Hope Bay. You can see by the attached 1989 map & flow chart done by RI DEM that the flow from Fall River affects Rhode Island & the waters of RI to Matunuk, particularly the Kickemuit River & Bristol Harbor. The Citizens for Environmental Justice that have monitored the site of the brownfield cleanup think that the company that caused the brownfield problem should not & could not properly monitor the stormwater runoff from this site. The KRC agrees. The outfall has potentially serious pollutants. It is NOT in the public or the environment's best interests to let this continue. KRC recommends a bio-retention area & filters in the stormdrains for this water---and- Stormceptors with a schedule for cleaning and replacing the filters, Stormceptors & the bio-retention area. An independent firm chosen by EPA should handle this for WCE. WCE should pay for the firm for this and for analyzing the discharge on a regular schedule--reporting to EPA, MassDEP, & RIDEM.

Response to Comment M1: Although EPA has the authority to set specific effluent limits and other permit conditions in NPDES permits, it typically cannot dictate what measures the permittee must take to meet such permit conditions. Although the commenter's recommendations regarding treatment for stormwater may have merit for this site, it is ultimately up to the permittee to decide on specific measures in this regard. EPA recommends that the permittee take these commenter's suggestions into consideration, however.

The commenter also recommended that work on the site to comply with permit requirements be conducted by an independent firm chosen by EPA. The NPDES Program is designed to be implemented by permittees with the permittee accountable for all aspects of the work to ensure compliance, including the selecting of contractors, paying for the work that is performed, and ensuring that such work is conducted and properly reported to the Agencies. EPA is not making an exception to this practice for this permit. It should be noted that any falsification of information submitted under this permit is subject to civil and criminal penalties as provided in Part II.C.1.e. of the permit. OK!

Also see responses to Comments B1, B2, and J5.

N. Testimony provided by Priscilla Chapman:

Comment N1:

This is a very important permit as I'm sure you realize. Stormwater has been identified as the leading cause of the remaining pollution of our waterways. And as previous speakers have pointed out, the Taunton River was designated a couple of years ago as a national Wild and Scenic River. It is classified as SB, which means the goal is to make it fishable and swimmable which it is probably not at this point. We know that it is impaired for pathogens. And I believe we need more information regarding some of the other pollutants. This site is very large, 73 acres. And so, there is obviously a great potential for storm water to impact the river.

Response to Comment N1:

EPA took into consideration the existing impairments of the Taunton River when developing this draft permit. As explained in the fact sheet, there were additional monitoring requirements established for several parameters, including bacteria, metals, and parameters associated with petroleum hydrocarbons. Based on the monitoring information collected under this permit, EPA may determine that the permit would need to be reopened to impose specific limits on any of these parameters were it found that they had the potential to cause or contribute to a WQS violation or to any ongoing impairment. In light of these and other comments, there has been a monitoring requirement established for arsenic as well as a requirement for the permittee to conduct a groundwater infiltration study. Also see responses to Comments B1, B2, J5, and L9.

Comment N2:

As many speakers have pointed out before, it is also a problem site because of the earlier contamination and the pump and treat system that Shell Oil was required to operate.
So, just having said that, I basically just have two comments. The Draft Permit would impose limits on flow, pH and oil and grease. It would require monitoring for total suspended solids polyaromatic hydrocarbons, bacteria, gasoline, constituents, metals and TPH.

I can't understand how we can expect the Taunton River to get cleaner by simply requiring monitoring. Monitoring is obviously a good thing, but, I would urge EPA to reconsider this permit and review the information that was presented by Fall River's attorney regarding the potential groundwater infiltration and to include limits on as many of those constituents as is reasonably possible. I think that that is the only way that we are going to improve the impacts on the Taunton River for storm water.

Response to Comment N2: See responses to comments B1, B2, and J5.

Comment N3:

The second point that I want to make, on page 4 of the Fact Sheet, under the paragraph that says Outfall 001, it says, "according to the permittee, all stormwater from the portion of the property labeled Area 2 either runs off the site or infiltrates into the ground with no discrete outfalls."

And if you look at the map that was included in the Draft Permit, it appears that Area 2 is actually quite a substantial portion of the site. Area 3 discharges through Outfall 001. Area 1 discharges through Outfall 004. And if I'm reading this correctly, this large area in the middle, the stormwater just runs off. Now, I understand that these permits are designed for specific discharge outflows. But, I also notice in the permit that there would be a requirement for the owner to create a stormwater pollution prevention plan. So, I am wondering if EPA could consider the possibility of requiring the owner to consider the stormwater that's running off Area 2 in the middle of the site as part of that stormwater prevention plan (SWPPP) and to come up with some recommendations for how the stormwater in that very large area could be treated.

Comment related to Comment N3 from WCE:

There is no evidence that "sheet flow" from the Weaver's Cove site flows into the Taunton River.

Response to Comment N3 and WCE's related comment:

On May 8, 2009, WCE submitted additional permit reapplication information to EPA as a result of an information request from EPA. This package of information included an attachment labeled "Site Map Existing Stormwater Drainage", which was also included in the fact sheet accompanying the Draft Permit and designated as Figure 2. This attachment segregates the site into three different drainage areas labeled Areas 1, 2, and 3. The description for Area 2 states "stormwater from this area infiltrates or runs off to the river". On a site visit to WCE conducted by EPA and MassDEP on September 22, 2011, the Agencies saw no pipe or other discrete conveyance discharging stormwater from Area 2 to the Taunton River. Also see response to Comment J5.

O. Testimony provided by Frank Perry:

Comment O1:

I have to go back to Mr. Firmin's comments at the beginning when he mentioned that it is illegal to discharge contaminants of any kind into any waterways. I picked up on that. And in other words, if I had a permit, I could dump anything I want in the river. That's pretty much basically what you're saying. I can do that and filter it through chemicals or whatever I have to do.

Response to Comment O1:

Bryant Firmin's testimony at the hearing was as follows :
"The Massachusetts Clean Waters Act, General Laws 21, Sections 26 through 53, and the Code of Massachusetts Regulations 314 CMR 3.00 prohibit the discharge of a pollutant to waters of the Commonwealth unless authorized by a permit issued by the Massachusetts Department of Environmental Protection." Therefore, NPDES permits, which are jointly issued in the Commonwealth of Massachusetts by EPA and MassDEP, do allow for discharges to receiving waters provided they are consistent with State and Federal laws and water quality standards. Permit requirements are established to assure that WQS are met and include effluent limits, monitoring requirements, and specific narrative requirements.

Comment O2:

My second comment on this is, for years, contaminated sites have been dug up and trucked and trailer dumps of all sorts, Pennsylvania and New York, and they are incinerated and redumped back into the sites where they came from. Why can't this be done? Why can't we hold Shell Oil, Weaver's Cove, Hess LNG accountable and hold their backs to the wall on this? It would be so much cheaper and inexpensive to bring in equipment and incinerate the soil right on site. And this could've been rectified years ago if this had been done. Why isn't it done? Why don't you people hold these people's backs to the walls and have it done? We wouldn't be talking about a discharge plant today sitting in this auditorium.

Response to Comment O2:

This comment focuses on the residual site contamination from former operations and several remediation alternatives. Site cleanup, or remediation, is currently under the direction of the State's MCP program as already discussed. During the MCP process, the residual contamination at the site is evaluated and the feasibility and effectiveness of remediation approaches, such as those raised by the commenter, are assessed. A groundwater cleanup program continues on a schedule set up by the MCP. The current site cleanup being conducted under the MCP focuses on groundwater remediation of historic petroleum impacts. Contaminated soils from the site have already been excavated and properly disposed of off site as part of initial source removal efforts conducted much earlier. The MCP does not dictate which specific technologies get used for site cleanup. As part of the MCP cleanup approval process, the responsible party (RP) must identify a range of remedial action alternatives which are evaluated based upon technical feasibility, cost/benefit, implementability, and effectiveness. The RP selects an appropriate remedy based upon the evaluation, in consultation with MassDEP. Note that the MCP cleanup activities underway at the site are separate from the NPDES permit for stormwater currently under review. The MassDEP has acknowledged that the site is currently in compliance with the MCP.

P. Comments submitted by Sarah Guilmette

Comment P1:

How can something like this happen to the river with the Taunton River as "Wild and Scenic" designations ? Do the correct thing, no dumping in this river! We in Fall River have installed a sewer overflow project, the City has taken out loans to pay for federally mandated cleanup projects and now a company wants a permit to dump something into our river, after all they could say they are dumping this and be dumping that. No dumping should be allowed, the taxpayers' money is being spent to help clean the river, by not dumping into it.

Response to Comment P1:

Regarding the Taunton River's designation as a "Wild and Scenic River", see response to Comment L9. EPA and MassDEP drafted this permit to contain conditions that would allow for a further characterization of the Outfall 001 and 004 discharges and to be consistent with State WQS and the Federal CWA. The project that the commenter mentions has to do with the City of Fall River's sewer separation project, which is resulting in the lower incidence of combined sewer overflows to the Taunton River and other receiving waters. As already noted, this permit is not authorizing any new discharges to the river, but rather continuing to permit and better characterize the ongoing stormwater discharges from these two outfalls. As noted in responses to Comments B1 and B2, this permit contains additional monitoring requirements to characterize the stormwater being discharged as well as a new requirement to conduct a groundwater infiltration study.

Q. Comments submitted by Kathleen C. Medeiros

Comment Q1: What are the current plans for the eight remaining tanks that are left at the site of the permittee (Weaver's Cove)? Have they been dismantled?

Response to Comment Q1: See response to comment J3.

Comment Q2:

What are the receiving water requirements? What are the effluent water requirements?

Response to Comment Q2:

The fact sheet that accompanied the draft permit provided a description of the receiving water and the State and Federal WQS that apply to these permitted discharges. The current status of the Taunton River was discussed, including the pollutants that the River was impaired for, which

formed the basis for some of the conditions in the permit. The fact sheet also included a description and rationale for all of the permit's effluent limits and monitoring requirements.

Comment Q3:

In the Outfall 004 pH paragraph, it references the pH ranged between 6.33 – 7.76 s.u. with one exceedance below 6.5 s.u. during the monitoring period. Can you explain how the 6.5 s.u. exceeds the requirement if it's within the range expected?

Response to Comment Q3:

The fact sheet summarized the pH values that had been reported by the permittee and noted that one of these values fell outside of the permitted range. The 1978 permit required that the effluent pH be within the range of 6.5 to 8.5 standard units and that one of these samples, recorded at 6.33 s.u., was outside of this range and represents a permit violation.

Comments submitted by Ronald Thomas (these were identical comments to those submitted during the original comment period, which are responded to above in Part D).

R. Comments submitted by Gail Welch

Comment R1: Bristol residents are very concerned about polluted water being discharged into Mount Hope Bay. Please enforce stringent requirements, including a bio-retention area and filters and stormceptors with frequent changes of the filters, with tests and test results available to EPA, RI DEM and MA DEM. Save the bay.

Response to Comment R1: EPA believes that the effluent limits, monitoring requirements, and new groundwater infiltration study requirement are the appropriate next steps to effectively further characterize discharges from this site and provide the information needed to determine if additional permit conditions are necessary to ensure compliance with water quality standards. We appreciate your suggestions for additional treatment technologies for the water being discharged from this site to surface water. However, as noted in the response to Comment M1 and consistent with the design of the NPDES Program, the permittee is responsible for determining how to comply with the permit limits in this situation.

Also see responses to Comments B1, B2, and J5.

March 25, 2013

Weaver's Cove Energy

June 9, 2011

Mr. George Papadopoulos
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mailcode OEP 06-01
Boston, MA 02109-3912

Reference: Weaver's Cove Energy NPDES Draft Permit MA0004871

Dear Mr. Papadopoulos,

Weaver's Cove Energy, LLC is in receipt of a letter from David Webster, Chief, Industrial Permits Branch dated April 28, 2011 ("April 28 letter") and the accompanying draft NPDES permit for our facility at One New Street in Fall River, MA. In accordance with the April 28 letter and subsequent extension of the public comment period from June 1, 2011 to June 18, 2011, Weaver's Cove Energy submits the following timely comments on the draft NPDES permit.

1. As with the original NPDES permit from 1978, the draft NPDES permit accurately identifies the facility address as One New Street in Fall river, MA. However, the Fact Sheet attached to the draft permit incorrectly identifies the site as approximately 73 acres. Weaver's Cove Energy in fact owns multiple parcels in the area, but the One New Street site that is the subject of this permit comprises approximately 50 acres.
2. The One New Street site is identified as Lot 1 on Fall River Tax Map T-2 and matches the area of coverage correctly depicted on Figure 2 Outfall Drainage Areas.
3. Figure 1 attached to the draft NPDES permit shows the One New Street property plus other lots that are owned by Weaver's Cove Energy but are not subject to the NPDES discharge permit. The correct approximate outline of the property subject to the NPDES permit is provided on the attached revised Figure 1.
4. Additional comments on Figure 1 and the text of Sections I and II of the Fact Sheet can be seen annotated in red (see document attached to this letter).

If you have any questions please call me at 774.488.3877 or reach me by email at bfrothingham@hessLNG.com.

Regards,

Benjamin R. Frothingham, C.G., LSP
Manager of EHS
Weaver's Cove Energy

One New Street, Fall River, MA 02720
phone 774.448.3900, fax 508.675.9473
www.weaverscove.com

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"), and the Massachusetts Clean Waters Act, as amended, (M.G.L. Chap. 21, §§ 26-53)

Weaver's Cove Energy, LLC

is authorized to discharge from the facility located at

One New Street
Fall River, MA 02720

to receiving water named **Taunton River (MA62-04)**, a Class SB water, in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This permit shall become effective on the first day of the calendar month following 60 days after signature if comments are received. If no comments are received, this permit is effective upon signature.

This permit supersedes the permit issued on November 20, 1978.

This permit and the authorization to discharge expire at midnight, five (5) years from the last day of the month preceding the effective date.

This permit consists of 11 pages in Part I including effluent limitations and monitoring requirements, and 25 pages in Part II including General Conditions and Definitions.

Signed this day of , 2011

Stephen S. Perkins, Director
Office of Ecosystem Protection
Environmental Protection Agency
Region I
Boston, MA

David Ferris, Director
Massachusetts Wastewater Management
Department of Environmental Protection
Commonwealth of Massachusetts
Boston, MA

This is the correct legal address of the property. The area of the property at one New Street is defined by City of Fall River Tax Map T2 Lot 1.

NOTE: The NPDES draft permit does not address lands East of the Railroad property currently owned by Weaver's Cove Energy and the Permit also does not address lands currently owned today by Weaver's Cove Energy which were formerly owned by St Vincent's Home that are located West of the Railroad tracks and border the Taunton River as the prior permit did not address drainage from these land areas. Storm water from both of these land areas do not drain through the permitted system

Approximately 50 acre site located at One New Street in Fall River (Tax Map T2 Lot 1)

I. Proposed Action, Type of Facility and Discharge Location

Weaver's Cove Energy, LLC ("Weaver's Cove") is the current owner of this approximately 73 acre site, which is situated along the banks of the Taunton River in Fall River, Massachusetts and is characterized as a brownfields site. This site is currently operating as an engineering and project development office in preparation for the construction of a Liquefied Natural Gas (LNG) offloading, processing, and sendout facility. This site had formerly been owned by the Shell Oil Company and operated as a bulk petroleum storage facility with multiple storage tanks. Petroleum products including gasoline, distillate oil, kerosene, and naphtha were delivered to this site by ocean-going tanker or barge, stored in an array of on-site tanks, and then transported to market by truck, pipeline, and rail. Prior to Shell's purchase of the site in the 1920's, the New England Oil and Refining Company conducted petroleum refining and storage operations at the site. This site is permitted for the storage of up to 64 million gallons of petroleum product, but most of these operations were discontinued in the late 1990's, as the decommissioning and dismantling of storage tanks occurred. All petroleum products were removed from the storage tanks on this site and all but 8 of these storage tanks have been removed from the property. The permittee is planning to remove all remaining storage tanks and associated piping as well as a pier structure after all permitting for the proposed LNG project is complete and major site work begins.

There is currently a groundwater remediation system on site treating contaminated groundwater that is being operated by Shell Oil, a former owner of this site. This cleanup is being conducted under the Massachusetts Contingency Plan (MCP) guidelines and Shell Oil is currently the responsible party for the operation and maintenance of this treatment system. This discharge of treated groundwater, through Outfall 001A, is permitted and limited separately by EPA's Remediation General Permit (RGP).

In 1978, NPDES permit #MA0004871, specifically authorizing the storm water discl from Outfalls 001 and 004, was issued to Shell Oil. This permit was transferred to J. Cashman, Inc. in 2003, and was subsequently transferred to Weaver's Cove in 2007. This permit expired on November 20, 1983, but was administratively continued at th time, due to Shell Oil's submittal of a completed NPDES re-application in 1983. As result, Weaver's Cove remains subject to the existing (1978) permit until EPA issues new one.

on land that is subject to this permit and also on one adjacent and three nearby parcels of property in Fall River. The proposed LNG facility

The permittee plans to construct a state-of-the-art LNG Terminal, which will include LNG transfer piping, a 200,000 cubic meter LNG storage tank, vaporization equipment, an LNG truck loading area, and other ancillary equipment. Other improvements will also be made to the site relative to the waterfront area. This terminal is expected to provide about 20% of the area's natural gas supply.

of any type

Since large LNG ships are prohibited by the presence of the old Brightman Street bridge from navigating the Taunton River to and from this location, Weaver's Cove has applied to the Federal Energy Regulatory Commission (FERC) for approval to construct, own, and operate an offshore berth in Mount Hope Bay in Massachusetts

waters; as well as an approximately 4.25-mile-long LNG transfer system, which will include buried submarine LNG transfer lines. It is proposed that LNG delivered by LNG ships will be unloaded at the offshore berth and transferred through the LNG transfer system to the LNG storage tank at the LNG terminal site in Fall River. The project will include development of a turning basin, to accommodate LNG tanker turning maneuvers where the tankers leave the existing federal navigation channel and enter a proposed new approach channel providing access to the offshore berth site.

This proposed permit does not cover discharges associated with the planned LNG terminal but rather covers the discharge of storm water that may contain pollutants associated with the previous and current site uses.

See **Figure 1** for a map of the site location and outfalls and **Figure 2** for a map showing the drainage areas for these outfalls, which will be authorized by this draft permit.

Map Figure 1 as drafted has errors. It includes the entire site of the proposed LNG facility -- which is comprised of five parcels of Land. This draft NPDES permit covers the largest of these five parcels. The parcel addressed by the prior permit and the current permit is shown on the City of Fall River Tax Maps on Map T2 Lot 1.

II. Description of Treatment System and Discharges

located at One New Street

Outfall 001

As shown in Figures 1 and 2, Outfall 001 is located on the north side of the property and collects storm water from the portion of the site labeled "Area 3". This outfall comprises storm water runoff which is treated through an oil/water (O/W) separator prior to being discharged to the Taunton River. The current site is characterized primarily by sand and gravel around the previous and existing tank farm areas, vegetation around most of the perimeter of the site, and paved areas near the entrance to the site where the offices are located. According to the permittee, all storm water from the portion of the property labeled "Area 2" either runs off the site or infiltrates into the ground, with no discrete outfalls.

located at One New Street

Outfall 004

As seen in the attached figures, Outfall 004 is located on the south side of this property and collects storm water from the portion of the site labeled "Area 1". Previously, Outfall 004 was located closer to the southern edge of the property and included treatment through a now abandoned O/W separator.

III. Receiving Water Description

Under the state water use classification system, the Massachusetts Department of Environmental Protection (MassDEP) has designated this stretch of the Taunton River, classified as Segment MA62-04, as a Class SB water warm fishery, with shellfishing (Restricted) and combined sewer overflow (CSO) discharges. Shellfishing is restricted in this vicinity due to elevated bacteria levels.

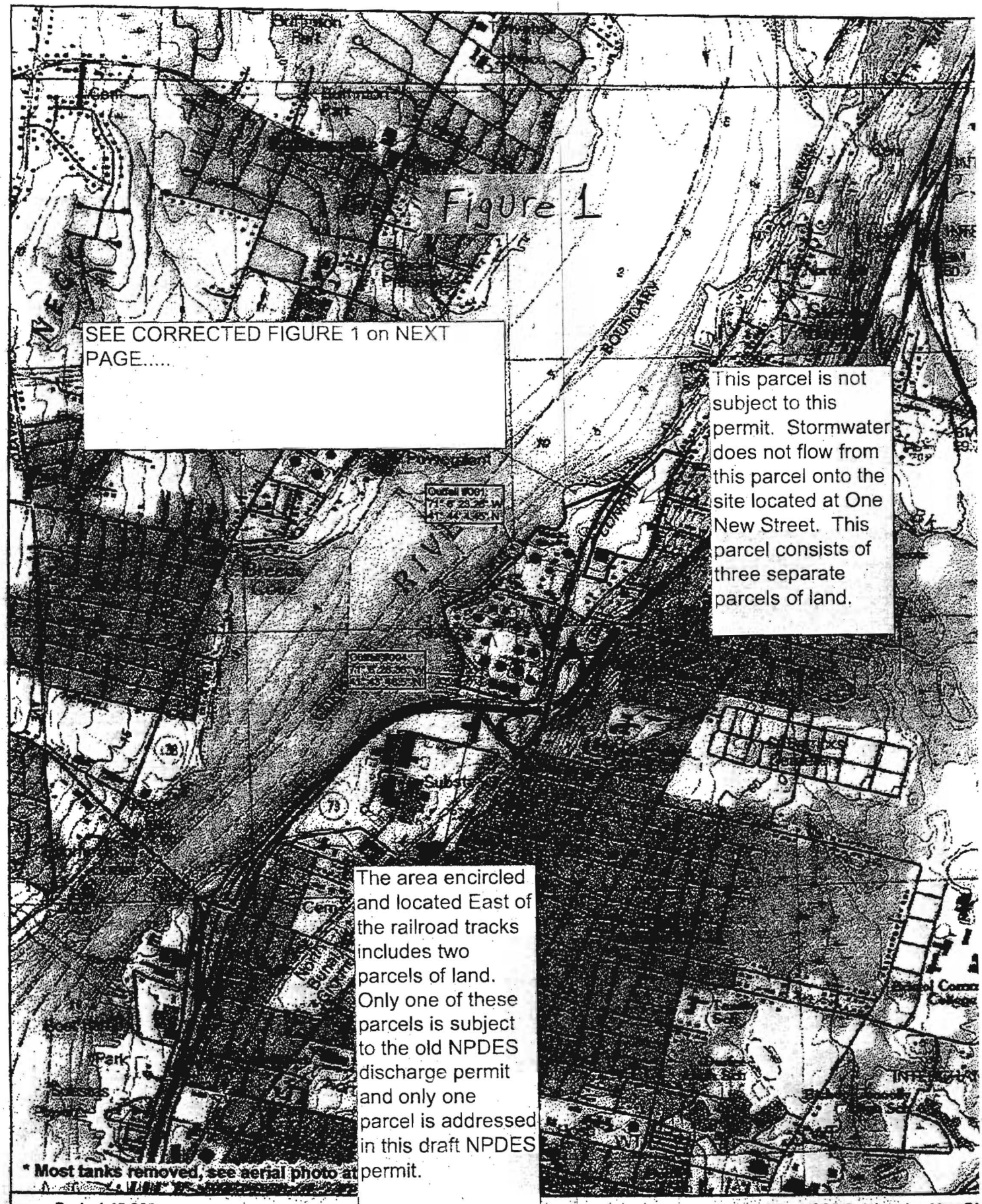
Figure 1
SEE CORRECTED FIGURE 1 on NEXT PAGE.....
This parcel is not subject to this permit. Stormwater does not flow from this parcel onto the site located at One New Street. This parcel consists of three separate parcels of land.
The area encircled and located East of the railroad tracks includes two parcels of land. Only one of these parcels is subject to the old NPDES discharge permit and only one parcel is addressed in this draft NPDES permit.
See next page for a corrected figure.
Outfall #001
* Most tanks removed, see aerial photo at
Scale 1:18,000
1 inch = 1,500 feet
0 750 1,500
Feet
Basemap: USGS Quadrangles, MassGI
Weaver's Cove Energy, LLC
Epsilon
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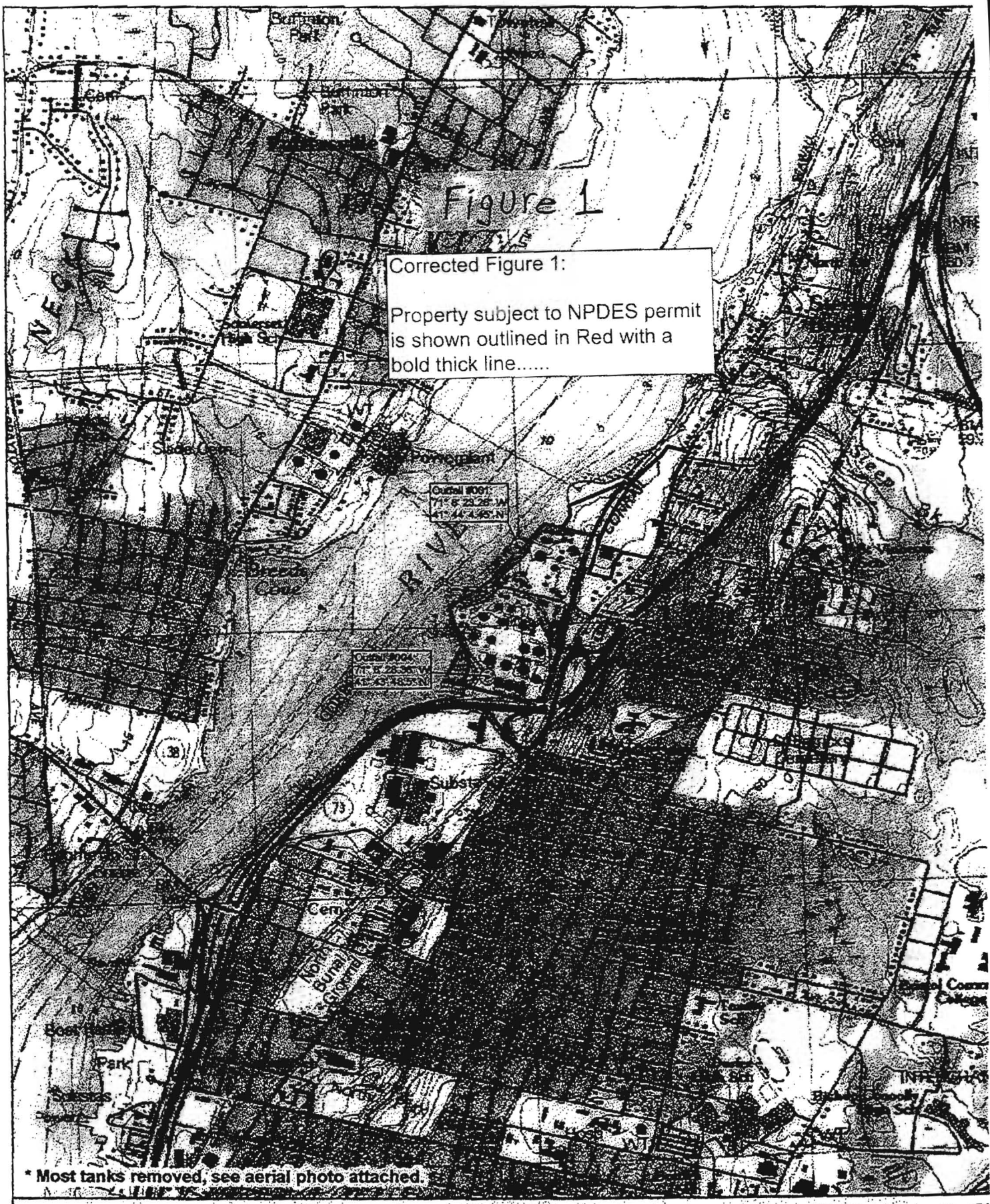
Figure 1
Corrected Figure 1:
Property subject to NPDES permit is shown outlined in Red with a bold thick line.....
Outfall #001:
Outfall #004:
* Most tanks removed, see aerial photo attached.
Scale 1:18,000
1 inch = 1,500 feet
0 750 1,500
Feet
Project Site
Outfall Locations
Weaver's Cove Energy, LLC
Basemap: USGS Quadrangles, MassGI
Epsilon
G:\Projects\Fall_Riv\79001\NPDES\FR_site_outfalls.mxd