



MASSACHUSETTS WATER RESOURCES AUTHORITY

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January 5, 2017

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge St, Suite 900
Attn: MEPA Office, Page Czepiga
Boston, MA 02114

Subject: EOEEA #15411 – Environmental Notification Form
205 Revere Beach Parkway, Revere, MA

Dear Secretary Beaton:

The Massachusetts Water Resources Authority (MWRA) appreciates the opportunity to comment on the Environmental Notification Form (ENF) submitted by 205 Revere Beach Parkway Partners, LLC (the "Proponent") for 205 Revere Beach Parkway (the "Project") in Revere, Massachusetts. The Project is an approximately 6.2-acre elongated parcel running east to west along Revere Beach Parkway. Existing conditions at the site include a vacant 41,300 square foot (sf) former supermarket building and 166,000 sf paved parking lot. Sales Creek is located at the back of the site, separating the parcel from the residential neighborhood to the north. Suffolk Downs is located on the opposite side of Revere Beach Parkway, the MBTA Blue Line's Beachmont Station is located less than one-quarter mile to the south, and Revere Beach is located about one-quarter mile to the northeast. The vacant supermarket will be demolished to allow construction of the proposed mixed-use development comprising two buildings: a 5-story hotel consisting of 132 keys and a 6-story multi-family residential building consisting of 195 total residential units above the first floor, along with ground level amenities, landscaped areas, and ancillary covered or garage parking for approximately 67 vehicles. A proposed surface parking lot will provide an additional 231 spaces.

MWRA's comments focus on Stormwater and Wastewater issues emphasizing the need for Infiltration/Inflow (I/I) Removal, Discharge Permitting from the Toxic Reduction and Control (TRAC) Department, and Section 8 (m) permitting.

Stormwater and Wastewater

According to the ENF, the Project site is located in the City's Highway Business District, and utilities are available adjacent to the site. These include 8-inch and 20-inch municipal sanitary sewers in Revere Beach Parkway. The ENF also reports that the City of Revere's Public Works Department has stated that the existing city water and sewers systems can accommodate the Project's water demand and wastewater flows. Both of the local sanitary sewers eventually connect to a 36-inch by 40-inch city sewer that conveys flows to MWRA's Revere Extension Sewer, which in turn conveys flows to MWRA's Chelsea Creek Headworks. The Chelsea Creek

Headworks directs flows to the Deer Island Treatment Plant. During large storms, sanitary flows and I/I from the City of Revere's and other communities' collection systems, together with combined sanitary and stormwater from the City of Chelsea's combined sewer system can overwhelm the capacity of MWRA's system, contributing to combined sewer overflow (CSO) discharges to Chelsea Creek at CSO Outfall CHE008.

The ENF reports that the Project will generate approximately 45,250 gallons per day (gpd) of new wastewater flow. MWRA recently completed a \$910 million program of local and regional wastewater system improvements to control CSO discharges and improve receiving water quality, including the water quality of Chelsea Creek and Boston Inner Harbor. The impacts of new sanitary flows to the local sewers and MWRA facilities should be fully mitigated to help ensure that the benefits of CSO control, including water quality improvements, will be realized and sustained for the long term.

To avoid increasing system surcharging and CSO discharges in large storms and compromising CSO control goals, the Proponent should offset the Project's sanitary flow I/I removal or sewer separation (i.e. stormwater inflow removal) in a hydraulically related sewer system(s) in strict compliance with Massachusetts Department of Environmental Protection ("MassDEP") regulation and related City of Revere policy. The MassDEP regulation requires a 4:1 offset; that is, the removal of 4 gallons of I/I for every gallon of new sanitary flow.

TRAC Discharge Permitting

MWRA prohibits the discharge of groundwater to the sanitary sewer system, pursuant to 360 CMR 10.023(1), except in a combined sewer area when permitted by MWRA and the municipality. The Project is served by separate city sewers and storm drains and is not in a combined sewer area. Therefore, the discharge of groundwater or storm water to the sewer system, including during construction dewatering, is prohibited. The Proponent will need to secure a USEPA-NPDES General Permit for Storm Water Discharges from its construction activities.

Once the proposed hotel is completed and if it intends to operate a laundry facility on the premises, an MWRA Sewer Use Discharge Permit will be required for the discharge of laundry effluent into the sanitary sewer system. For assistance in obtaining this a permit, a representative from the hotel should contact Mr. Ken Cunningham, Industrial Coordinator in the TRAC Department at (617) 305-5623. The hotel must have this discharge permit prior to discharging wastewater from its laundry operations into the MWRA sanitary sewer system.

The Proponent must also comply with 360 C.M.R. 10.016, if it intends to install gas/oil separator(s) in its parking structures. In addition to complying with 360 C.M.R. 10.000, the Proponent must conform to the regulations of the Board of State Examiners of Plumbers and Gas Fitters, 248 C.M.R. 2.00 (State Plumbing Code), and all other applicable laws. The installation of the proposed gas/oil separator(s) will require MWRA approval and may not be back filled until inspected and approved by the MWRA and the Local Plumbing Inspector. For assistance in obtaining an inspection, a representative for the Project should contact Mr. Stephen Howard, Source Coordinator in the TRAC Department at (617) 305-5675.

Section 8 (m) Permitting

Section 8 (m) of Chapter 372 of the Acts of 1984, MWRA's Enabling Legislation, allows the MWRA to issue permits to build, construct, excavate, or cross within or near an easement or other property interest held by the MWRA, with the goal of protecting Authority-owned infrastructure. The ENF acknowledges that the Project will need an 8 (m) permit due to the proximity of MWRA water infrastructure. The Proponent should contact Mr. Ralph Francesconi in the Water Operations Permitting Group at (617) 305-5827 for assistance in this permitting process.

Sincerely,



Marianne Connolly
Senior Program Manager
Environmental Review and Compliance

cc: David Kubiak, E&C
Solomon Wondimu, E&C
Kattia Thomas, TRAC
Ralph Francesconi, MWRA 8(m) Water Permitting

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