

Witness:

Request from: **New Hampshire Public Utilities Commission Staff**

Question:

(Exhibit PSNH-10): Has PSNH sought or obtained any industrial wastewater indirect discharge permits from the New Hampshire Department of Environmental Services?

Response:

On May 11, 2011, PSNH submitted to the New Hampshire Department of Environmental Services (NHDES) an Industrial Wastewater Indirect Discharge Request Application requesting that the municipal POTWs (publically owned treatment works) in Allenstown, Concord, Hooksett and Manchester accept treated wastewater from PSNH's wet flue gas desulfurization system.

Attached to this response is PSNH's May 11, 2011 letter to NHDES, and the approvals issued by NHDES and the various POTWs allowing disposal at each of these POTWs.

On August 23, 2011, PSNH further requested that the state-owned NHDES wastewater treatment plant in Franklin, New Hampshire (Winnepesaukee River Basin Program) accept such wastewater. The NHDES approval of this request is also attached to this response.

In addition, PSNH has received approval from the City of Lowell, Massachusetts to accept treated wastewater (see attached approval) and has agreements with two out-of-state privately operated wastewater disposal facilities.

The Parties to this docket were all aware that PSNH had received necessary approval for disposal of scrubber wastewater at the Hooksett and Concord POTW facilities, as those approval documents were provided to the Parties on January 31, 2012 in response to a technical session data request (Q-TECH-008).

Similarly, on or around October 17, 2011, in response to an RSA 91-A "Right to Know Request," the New Hampshire Department of Environmental Services provided the Conservation Law Foundation with copies of PSNH's application and the NHDES approvals for the disposal of scrubber wastewater to the Allenstown, Concord, and Hooksett POTW facilities.



**Public Service
of New Hampshire**

The Northeast Utilities System

Record Request HD-01
ID# 13120002
Q-RR-01
Page 2 of 46

PSNH Energy Park
780 North Commercial Street, Manchester, NH 03101

Public Service Company of New Hampshire
P.O. Box 330
Manchester, NH 03105-0330
(603) 669-4000
www.psnh.com

The Northeast Utilities System

May 11, 2011

Mr. George Carlson, P.E.
Supervisor, Industrial Pretreatment Program
N.H. Department of Environmental Services
Water Division
29 Hazen Drive, P.O. Box 95
Concord, New Hampshire 03301-0095

Re: NHDES Industrial Wastewater Indirect Discharge Request Application
Public Service of New Hampshire (PSNH)

RECEIVED
MAY 12 2011
DES-WEB

Dear Mr. Carlson:

Based on your recent meeting with Allan Palmer (PSNH) and Ron Breton (GZA GeoEnvironmental, Inc. [GZA]), our consulting engineer, PSNH is requesting that four separate municipalities (Allenstown, Concord, Hooksett, and Manchester) consider our request to accept treated wastewater from our wet flue gas desulfurization system that is scheduled to become operational in the fourth quarter of this year. With the State and local approvals and issuance of permits, it is our intention to transport treated wastewater by tanker truck from our power station in Bow to discharge points as designated by the individual municipalities.

As presented in our attached application, we are installing a technologically advanced wastewater treatment system. In addition, we are including post-treatment systems that can be used to reduce the volume of the treated wastestream from roughly 100,000 gallons per day (gpd) to as small a volume as 5,000 gpd. With these post-treatment systems, we will have the ability to reduce the volume of wastewater while maintaining concentrations of pollutants that are compatible with each treatment system. While our goal is to gain approval to discharge all the wastewater we generate at all four municipal facilities, we recognize that there may be restrictions at certain facilities and that only a portion of the total discharge may be accepted. This scenario has been considered in our overall wastewater management strategy.

This application has been provided to the Town of Hooksett and we have also prepared and submitted local permit applications directly to the wastewater treatment facilities of Allenstown, Concord, and Manchester. Please find attached GZA GeoEnvironmental Check No. 220959 in the amount of \$1,000.00 to cover the cost of design review.

During the course of performing your evaluation process, GZA and PSNH will be available to provide additional information and technical support.

We trust that this submittal adequately addresses your informational needs. Should you have any questions, please contact Ron Breton at 232-8744 or me at 224-4081.

Sincerely,

Harold Keyes, Station Manager
PUBLIC SERVICE OF NEW HAMPSHIRE

Attachment(s)



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Winnepesaukee River Basin Program
Wastewater Treatment Plant
P.O. Box 68 - Franklin, NH- 03235
603-934-4032

9/28/11

Mr. Harold Keyes
Station Manager
PSNH
97 River Road
Bow, NH 03304

Re: Status of PSNH Industrial Wastewater Indirect Discharge Request
Special Agreement – PSNH and WRBP Wastewater Treatment Plant

Dear Mr. Keyes:

Please be advised that the Winnepesaukee River Basin Program (WRBP) has reviewed your Industrial Wastewater Discharge Request received on August 24th, 2011. Based upon document review and discussions with Mr. Ron Breton, GZA Inc, Mr. George Carlson, NHDES, and the WRBP staff we would like to inform you that approval has been granted for indirect discharge from your facility. This letter serves as an agreement to discharge treated wastewater from your flue gas desulfurization system that is currently scheduled for discharge in November of 2011. Acceptance is based upon compliance with the terms listed below. These terms reflect the hours of operation of our facility, process concerns and staffing. The WRBP reserves the right to cancel the agreement at any time due to staffing concerns, logistics, non-payment or the identification of any negative impact on the operation of the plant or the existing land application program.

We understand that we will serve as one of several outlets for this discharge. Any testing results on the proposed discharge after start up at your facility will need to be forwarded to us for our review and files. We also reserve the right to require additional testing as needed.

The terms of the Special Agreement are as follows:

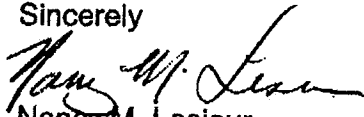
- The WRBP will accept up to 25,000 gallons per day of treated wastewater from PSNH's flue gas desulfurization system
- The cost shall be based upon a set charge of \$30.00 per 1000 gallons (\$.03 / gallon)
- Monthly invoices generated from the WRBP will be payable upon receipt
- Discharge haulers shall follow established procedures at the WRBP
- The discharge will be accepted between the hours of 7:15 am and 2:30 pm Monday through Friday
- The discharge will also be accepted on Saturdays between the hours of 7:30 am and 2:30 pm

Contact N. Lesieur
Date: 9/29/11
Page 2 of 2

- No discharge will be accepted on Saturdays during January, February, March and April
- No discharge will be accepted on days designated as Holidays by the State of NH
- Prior notification of the loads and volumes shall take place between the PSNH staff (or designated haulers) and the WRBP Operations Staff.
- During PSNH's initial start up (within the first 30 days) a representative sample shall be analyzed for Aluminum, Arsenic, Cadmium, Chloride, Chromium, Copper, Cyanide, Iron, Lead, Manganese, Mercury, Molybdenum, Nickel, Selenium, Silver, and Zinc
- WRBP reserves the right to terminate the agreement based upon any negative impact of the discharge on Local limits or Biosolids Land Application limits as evidenced by analyses performed

If you have any further questions regarding the agreement please feel free to contact me at 603 934-4032. We look forward to working with you during your facility start up.

Sincerely



Nancy M. Lesieur
Industrial Pretreatment Coordinator
NH-DES WRBP
Franklin WTF
528 River Street
Franklin, NH, 03235

NML

CC: Kenneth Noyes, Chief Operator, NHDES/WD/WRBP/-Franklin
Steven C. Dolloff, Superintendent, NHDES/WD/WRBP/-Franklin
Sharon McMillin, PhD, Administrator, NHDES/WD/WRBP/-Franklin
File
g:\group\common\lab\SpDischarges\PSNH



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner



INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST (IDR) APPROVAL

APPLICANT

Indirect Discharger **PSNH**
Address **97 River Rd., Bow, NH**
Authorized Signature **Harold Keyes** Station Manager
Engineer **Ronald Breton, GZA GeoEnvironmental**

MUNICIPALITY

Municipality/POTW **Winnepesaukee River Basin Program, WWTF**
Approval Signature **Nancy M. Lesieur** IPP Coordinator
Date of IDR **January 18, 2012**

APPROVAL

PERMIT/REQUEST NUMBER **IDR 11-016 W**
FLOW **25000** gallons/day DATE: **January 19, 2012**

The Department of Environmental Services has reviewed and hereby approves the request as follows: Approval of the discharge to the applicant's wastewater facilities is based on review of the supporting information submitted and is subject to the conditions indicated below and the standard Conditions of Approval on the second page.

CONDITIONS:

Approval is for acceptance of highly treated wastewater from the wet flue gas desulfurization system. The wastewater will be hauled by tanker truck to the POTW. Weekly sampling and analysis shall be performed until pollutant concentrations are determined to be consistent, at which time testing may be reduced to at least monthly.

George F. Carlson, Jr., P.E.

Telephone (603) 271-2052

NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES
INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST

CONDITIONS OF APPROVAL

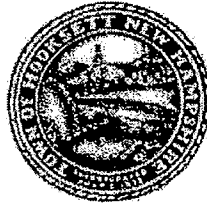
The department's approval of this discharge request is subject to the following conditions:

- (1) The indirect discharger shall fully comply with the applicable sewer use ordinance;
- (2) The indirect discharger shall fully comply with all federal, state and local pretreatment standards and requirements;
- (3) Using additional water to dilute effluent or introducing uncontaminated water to the effluent shall not be allowed as a substitute for any pretreatment necessary to maintain compliance;
- (4) The indirect discharger shall not make changes in the type of production, amount of flow, or pollutant characteristics, or any increase in pollutant concentration, without prior approval by the department through the submission of a new industrial wastewater discharge request;
- (5) The approval shall be based on and apply only to the subject discharge request and all associated plans and supporting information as submitted and shall be signed by the indirect discharger's authorized representative; and
- (6) The approval shall become void if the discharge approved does not begin within one year from the date of approval.

Upon receipt of notification from the department that the discharge request is approved, the municipality shall issue a discharge permit to the indirect discharger.

If there are any question or comments concerning this approval, please contact the Industrial Pretreatment Section Supervisor, at the Water Division, telephone 271-2052.

Bruce Kudrick
Superintendent



Commission
Sidney Baines, Chair
Raymond Robb
Roger Bergeron

Page 1 of 3
REVISED 9/7/11

TOWN OF HOOKSETT
Sewer Commission

Hauled Waste Waste Disposal Agreement No. WDA-001

In accordance with the provisions of the Town of Hooksett's Sewer Use Ordinance:

Office/Home
PSNH
780 North Commercial St.
Manchester, NH 03101

Work Site
PSNH - Merrimack Station
97 River Street
Bow, NH 03304

is authorized to discharge wastewater from the above-stated facility (the "Facility"). This discharge consists of:

<u>Description</u>	<u>Gallons/Day</u>
<u>Treated Blowdown from Flue Gas Desulfurization (FGD) System</u>	<u>70,000 gallons per day</u>

Compliance with this Waste Disposal Agreement does not relieve PSNH of its obligation to comply with any other applicable pretreatment requirements under local, State, or federal laws, including such requirements that may become effective during the term of this Agreement.

Noncompliance with any term or condition of this Agreement including the provisions of Page 2 shall constitute a violation of the Town's Sewer Use Ordinance and shall be subject to the penalty provisions of Section 9 and may include suspension of discharge privilege with 24 hours notice.

This Waste Disposal Agreement shall become Effective on: October 1, 2011
This Waste Disposal Agreement shall Expire on: September 30, 2012

Bruce Kudrick	<i>Bruce Kudrick</i>	Superintendent	<u>9/20/11</u> September 8, 2011
Waste Disposal Agreement Issued By	(signature)	(Title)	(Date)
Sidney Baines	<i>Sidney Baines</i>	Chairman, Hooksett Sewer Commission	<u>9/20/11</u> September 8, 2011
Authorization By (Town)	(signature)	(Title)	(Date)

Acknowledgement: The undersigned acknowledges receipt of this Agreement and acknowledges that this discharge is subject to the requirements of the Sewer Use Ordinance and this Agreement.

<u>PSNH</u>	<i>Harold Kuyes</i>	<u>9/7/2011</u>
Company Name	Authorized Representative	Date

This Agreement is subject to the following: PSNH Agreement No. WDA-001

Standard Conditions

Changes in discharge - Any substantial change in the type of production, amount of flow or wastewater characteristics, or any increase in wastewater concentration, must receive prior review and approval by the Town of Hooksett and the State of NH if applicable. The projected wastewater characteristics and concentrations were presented in PSNH's Industrial Discharge Request application submitted to the Town of Hooksett in May 2011 and are hereby a part of this Agreement.

Spills, potentially harmful dischargers - Immediate notification is required for any discharge that spills at the offloading facility that would potentially result in a violation of the Town's Stormwater Permit or other environmental concerns. This includes but is not limited to an accidental discharge of substances prohibited by the Sewer Use Ordinance or any slug loads or spills that may enter the public, right-of-way, receiving water or combined sewers.

- * During normal business hours (7:00 A.M. to 4:00 P.M.) notify:
Wastewater Plant Superintendent 485-7000
- * At all other times notify:
Wastewater Treatment Plant 485-7000

The notification shall include location of discharge, date and time thereof, type of waste, including concentration and estimated volumes, and any and all corrective actions taken to clean up the spill. PSNH will make notification in accordance with the requirements of this section and does not relieve its obligation of other reporting requirements as may arise under local, State, or federal laws.

Agreement Continuance - If PSNH desires to continue to discharge after the expiration of this Agreement, it shall reapply on the application forms then in use at least thirty (30) days before this Agreement expires. Under no circumstances shall PSNH continue to discharge after the expiration of this Agreement, except as authorized pursuant to a new agreement with, or an extension of this Agreement by, the Hooksett Sewer Commission.

Access by the Town - PSNH shall allow authorized Hooksett Sewer Commission personnel access for the purposes of inspection, investigation, and sampling of wastewater discharges from the Facility when requested.

Sampling & Analytical Requirements - Any sampling, preservation, handling, and analytical testing methods must conform to the requirements as set out in 40 CFR Part 136.

Other Requirements - The conditions listed in this Agreement are not all inclusive. The Town shall be notified if questions arise regarding PSNH's responsibilities under this Agreement or obligations under the Town's Sewer Use Ordinance. The Town reserves the right to make revisions to this Agreement in order to implement the requirements of the Ordinance and to protect the wastewater treatment plant and the public.

Special Conditions

1. Designated discharge point shall be sewer manhole (SMH) AZ33 located on PSNH property or a PSNH right-of-way in Hooksett and will be accessible 24 hours per day, 7 days per week unless otherwise directed by the Hooksett Sewer Commission.
2. PSNH shall design and install a discharge station at SMH AZ33 that is consistent with current engineering standards, as approved by the Hooksett Sewer Commission and the NHDES through the Sewer Connection Permit application process.
3. Fee shall be \$30.00 per 1,000 gallons of discharge (at proposed waste concentration).
4. The volume of treated FGD blowdown shall be metered and recorded on site before hauling to the discharge station.
5. Authorization to discharge is subject to maintaining compliance with the requirements of this Agreement and providing that there are no extenuating circumstances at the Hooksett Wastewater Treatment Plant that might cause the Hooksett Sewer Commission not to be able to accept the discharge; otherwise, suspension of discharge may occur with 24 hours' prior notice.
6. The Hooksett Sewer Commission reserves the right to obtain random samples and test for specific parameters.

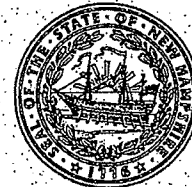
Special Conditions

7. The Hooksett Sewer Commission shall consider developing mass limits in lieu of concentration-based limits contained in the Hooksett Sewer Use Ordinance.
8. Direct discharge at the Hooksett Wastewater Treatment Plant is not allowed.
9. The vehicle and container used to transport the treated wastewater shall meet all applicable federal and State requirements for transportation of industrial wastewater.
10. The tanker containers shall be dedicated to the transportation of the PSNH wastestream or shall not contain any residual liquids or residues from previous uses (other than treated FGD wastewater from PSNH).
11. During the first twenty-one (21) days that the FGD system attains operational status and the resulting wastewater is considered representative, PSNH shall obtain composite samples on three (3) separate days during this period. The samples shall be analyzed for the wastewater characteristics presented in PSNH's Industrial Discharge Request application submitted to the Town in May 2011. The laboratory reports shall be submitted to the Town within forty-eight (48) hours of receipt by PSNH.
12. Appropriate security shall be provided at the designated discharge station to protect against unauthorized access.
13. A Bill of Lading shall be prepared for each truck discharging to the Town wastewater collection system.
14. PSNH shall incur the additional incremental cost of biosolids (i.e., sludge) testing for selenium. Prior to the first discharge event, the Town shall obtain a representative sample of its biosolids for the analysis of selenium. The frequency of sampling and analysis for selenium shall be weekly for the first four (4) weeks after the PSNH discharge commences. After the initial 4-week period, the frequency of sampling and analysis for selenium shall be reduced as agreed to by both parties. The Town shall provide appropriate documentation to PSNH substantiating the biosolids testing costs.
15. In the event that it is determined that the PSNH discharge has adversely impacted the quality of its biosolids, and thus voiding the Town's agreement with the Town of Merrimack, PSNH shall incur the additional incremental costs to transport and dispose biosolids at Waste Management's facility in Rochester, NH, or an equivalent disposal facility. The incremental costs to transport and dispose of biosolids will be incurred at a point in time when the quality of biosolids (due to the concentration of selenium only) is unacceptable by the Town of Merrimack's biosolids processing facility. PSNH will be responsible for the incremental costs up to a point after the PSNH discharge has been terminated and the concentration of selenium in the Town's biosolids has reached a level at or below 4 mg/kg. In no case will PSNH be responsible for incremental costs beyond four (4) weeks from the time the PSNH discharge was terminated. The Town shall be responsible for contracting such services and shall provide appropriate documentation to PSNH substantiating the additional incremental costs.



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner



INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST (IDR) APPROVAL

APPLICANT

Indirect Discharger **PSNH**
Address **97 River Rd., Bow, NH**
Authorized Signature **Harold Keyes** **Station Manager**
Engineer **Ronald Breton, GZA GeoEnvironmental**

MUNICIPALITY

Municipality/POTW **Hooksett Wastewater Treatment Plant**
Approval Signature **Sidney Baines** **Chairman**
Date of IDR **August 16, 2011**

APPROVAL

PERMIT/REQUEST NUMBER **IDR 11-016 H**
FLOW **100000** gallons/day DATE: **August 19, 2011**

The Department of Environmental Services has reviewed and hereby approves the request as follows: Approval of the discharge to the applicant's wastewater facilities is based on review of the supporting information submitted and is subject to the conditions indicated below and the standard Conditions of Approval on the second page.

CONDITIONS:

Approval is for acceptance of highly treated wastewater from the wet flue gas desulfurization system. The wastewater will be hauled by tanker truck to the POTW.

George F. Carlson, Jr., P.E.

Telephone (603) 271-2052

NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES
INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST

CONDITIONS OF APPROVAL

The department's approval of this discharge request is subject to the following conditions:

- (1) The indirect discharger shall fully comply with the applicable sewer use ordinance;
- (2) The indirect discharger shall fully comply with all federal, state and local pretreatment standards and requirements;
- (3) Using additional water to dilute effluent or introducing uncontaminated water to the effluent shall not be allowed as a substitute for any pretreatment necessary to maintain compliance;
- (4) The indirect discharger shall not make changes in the type of production, amount of flow, or pollutant characteristics, or any increase in pollutant concentration, without prior approval by the department through the submission of a new industrial wastewater discharge request;
- (5) The approval shall be based on and apply only to the subject discharge request and all associated plans and supporting information as submitted and shall be signed by the indirect discharger's authorized representative; and
- (6) The approval shall become void if the discharge approved does not begin within one year from the date of approval.

Upon receipt of notification from the department that the discharge request is approved, the municipality shall issue a discharge permit to the indirect discharger.

If there are any question or comments concerning this approval, please contact the Industrial Pretreatment Section Supervisor, at the Water Division, telephone 271-2052.

CITY OF CONCORD, N.H.
DEPARTMENT OF GENERAL SERVICES
WASTEWATER DIVISION

PERMIT TO DISCHARGE
INDUSTRIAL WASTEWATER
TRANSPORTED WASTE

[**X**] Concord WWTF [] Penacook WWTF Permit No. **PSNH 01**

1. Name of Industry: **PSNH- Merrimack Station**
2. Address of Industry: **97 River Road, Bow NH 03304**
3. Name of Owner: **Public Service Company of New Hampshire**
Phone # **603-669-4000**
4. Owner's Address: **780 North Commercial Street, Manchester, NH 03101**
5. Person in Responsible Charge/Phone No.: **Harold Keyes (Station Manager)**
Tel. 603-224-4081 ext. 4130
6. Existing Environmental Permit(s):

STATE

EPA

See Attached

See Attached

7. Standard Industrial Classification of Various Operations

4911

8. Brief description of the nature and average rates of production and operations
Non-production Process. Operations consist of fossil fuel power generation.
Wastewater is generated from air pollution control equipment.
9. Brief description of each regulated process and applicable Federal categorical pretreatment standard:
Not Applicable

10. If under categorical pretreatment standards, please attach a process flow diagram.

11. Wastewater flow (gallons per day): **TRANSPORTED WASTE**

	Industrial Process	Domestic =	Total
Average Daily	25,000	0.0	25,000
Maximum Daily:	25,000	0.0	25,000
Maximum Hourly:	N/A		

Note: Permitted discharge volume is the maximum allowed and is further limited based on a maximum daily Selenium loading of 0.300 lbs (see Section 16)

12. Please attach certified analyses showing the nature and concentrations of pollutants in discharge as indicated (Y or N).....[N]

ESTIMATED POLLUTION CONCENTRATIONS SUBMITTED

13. Brief description of all wastewater pretreatment equipment and/or systems currently in use:

On File (Submitted with Permit Application)

14. Schedule of actions regarding further pretreatment of wastestream(s) if noncompliant with Federal and/or City discharge limitations.

None at this time.

15. All industrial users shall immediately notify the City of any spills, bypasses or slug discharges of waste or wastewater discharged by such a user and shall provide protection from accidental discharges of prohibited materials or other substances regulated by the City's Sewer Use Ordinance. The City may request the industrial user to develop a slug discharge control plan.

All industrial users shall immediately notify the City of any new or changed discharge not covered under the existing industrial discharge permit.

16. Wastewater Discharge Limitations and Monitoring Requirements:

The industrial user shall comply with the effluent limitations specified below and all general discharge standards in of the City of Concord's Sewer Use Ordinance.

<u>Parameter</u>	<u>Daily Average</u>	<u>Daily Maximum</u>	<u>(##) Sampling Frequency/Type</u>
Cadmium	0.12 mg/l	0.12 mg/l	Monthly
Copper	12.00 mg/l	12.00 mg/l	Monthly
Lead	2.77 mg/l	2.77 mg/l	Monthly
Nickel	5.37 mg/l	5.37 mg/l	Monthly
Silver	7.90 mg/l	7.90 mg/l	Monthly
Zinc	6.07 mg/l	6.07 mg/l	Monthly
Selenium	0.300 lbs/day	0.300 lbs/day	Twice/Monthly

Attached list of pollutants on Addendum A must be sampled and tested monthly and shall not be of concentrations to cause interference/inhibition at the Hall St. WWTF. In addition, the user's discharges at the Hall St. WWTF must not cause the Hall St. WWTF'S final effluent to exceed water quality standards criteria, and low metals criteria for Class A biosolids.

(##) Sampling Requirements for Reporting Purposes: (Further description of Section 16 above). Special note: **Baseline monitoring shall consist of the analysis of pollutants listed on Addendum A and shall be conducted during initial start-up of the Merrimack Station scrubber system to determine actual pollutant concentrations prior to the initial discharge at the Hall St. WWTF.**

16(a). All sampling and analyses conducted by any industrial user or by the industrial user's contract laboratory must be in accordance with **40 CFR Part 136.**

All industrial users must maintain records of all information resulting from any monitoring activities as specified in **40 CFR 403.12(o).**

All industrial users shall be required to retain for a maximum of five (5) years any records of monitoring activities and results and shall make such records available for inspection and copying by the City. This period of retention shall be extended during the course of any unresolved litigation regarding the industrial user or City, or when requested by the City.

16(b). Monitoring reports must include reporting requirements in **40 CFR 403.6(a)(2)(ii)** for signature and certification.

17. Inspection Requirement/Frequency 1

18. Reporting Information:

The industrial user is required to submit reports to the City on the results of its sampling for the parameters specified in Section 16 of this permit.

Frequency of Reporting Monthly

Reports due on or before: The 15th of each month for the previous month's testing.

Sampling period for Report: Anytime during the month

Any additional sampling/testing conducted must be submitted.

(Please include a diagram indicating the location of the sampling point(s)).

On File

Note: All reports must be submitted to the following address:

City of Concord
Dept. of General Services
Wastewater Division
125 Hall Street
Concord, N.H. 03301
Attn: Tom Neforas

- 19 (a). When self-monitoring by an industrial user indicates a violation, the industrial user must notify the City within 24 hours of becoming aware of the violation and must resample and resubmit the result(s) within thirty (30) days.

Applicable civil penalties for violations of this industrial wastewater discharge permit are so stated in the City's Sewer Use Ordinance, **Section 9-6-32** titled Penalties Defined.

INDUSTRIAL SLUG CONTROL PLAN

Not applicable: Generator is not connected to the sewer collection system.

Waste to be transported to the City of Concord Hall St. WWTF and discharged at a designated location within the WWTF.

INDUSTRIAL FACT SHEET

**Merrimack Station - PSNH
97 River Road
Bow, New Hampshire 03304**

**Public Service Company of New Hampshire
780 North Commercial Street
Manchester, NH 03101**

**Harold Keyes (Station Manager) Tel. # 603-224-4081 ext. 4130
Allan Palmer (Senior Engineer) Tel. # 603-634-2439
Arthur Auclair (Environmental Coordinator) Tel. # 603-224-4081 ext. 4234**

Fossil Fuel Power Generator

Waste generated from air pollution control equipment

**Transported waste is allowed to be discharged Monday through Friday
7: 00 a.m. – 3:30 p. m. (except City recognized holidays).**

PSNH shall be billed at a rate of 3.7 cents per gallon.

**Transported waste volumes must be accompanied by Bill of Lading
to verify load volumes.**

**PSNH shall incur the cost of additional biosolids testing for selenium.
Initially, such testing for selenium will be conducted not more than three
times weekly. Sampling will be conducted by Hall St. WWTF personnel.
Based on the City's evaluation of the data, the testing frequency for selenium
in the biosolids may be reduced or eliminated.**


**Note: this permit is issued based on estimated pollutant concentrations as
submitted with PSNH's Permit Application. The permit as issued may be
revised or revoked based on actual test results once received when waste is
being generated from the Scrubber System located at PSNH's Merrimack
Station located at 97 River Road, Bow NH.**

Issued by:



Laboratory Manager

8-31-2011
Date

8-31-2013
Expiration Date 

This permit is non-transferable without prior notification to the City and without providing a copy of the permit to the new operator or owner. This permit may be revised due to any changes in Local, State and/or Federal regulations. A copy of this permit shall be provided to the NHDES if so requested.

ADDENDUM A LIST OF POLLUTANTS

**ALUMINUM
ANTIMONY
ARSENIC
BARIUM
BERYLLIUM
CADMIUM
CHROMIUM
COPPER
IRON
LEAD
MANGANESE
MERCURY
NICKEL
SILVER
ZINC
SELENIUM
THALLIUM**

**CHLORIDE
CYANIDE
FLOURIDE
pH
OIL AND GREASE
SULFATE
TOTAL SUSPENDED SOLIDS**

**NOTE: ALL POLLUTANTS MUST BE SAMPLED AND TESTED MONTHLY.
SELENIUM MUST BE TESTED TWICE MONTHLY**

LIST OF ENVIRONMENTAL PERMITS
PUBLIC SERVICE OF NEW HAMPSHIRE
MERRIMACK STATION

TP-OO8	Flue Gas Desulfurization Unit
FP-T-0054	Electric Generating Unit # 1
TP-T-0462	Electric Generating Unit # 2
TP-B-0490	Emergency Boiler
PO-B-1788	Emergency Generator # 1
PO-BP-2416	Primary Coal Crushers
PO-BP-2417	Secondary Coal Crushers
PO-B-0034	Combustion Turbine # 1
PO-B-0035	Combustion Turbine # 2
TV-AR-01	Acid Rain Permit
TV-AR-0055	Proposed Title V Operating Permit
TP-0068	Emergency Cooling Water Pump Engine
DPHS-SW-85-012	Solid Waste Facility
GWP-19840065-B-004	Ground Water Permit
11-026610	Permit to Operate Public Water System
DES-HW-LP-06-22	Hazardous Waste Limited Permit
NH00011465	NPDES Permit
NHR05C069	MSGP-2008

- BLANK PAGE -



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner



INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST (IDR) APPROVAL

APPLICANT

Indirect Discharger **PSNH**
Address **97 River Rd., Bow, NH**
Authorized Signature **Harold Keyes** **Station Manager**
Engineer **Ronald Breton, GZA GeoEnvironmental**

MUNICIPALITY

Municipality/POTW **Concord Wastewater Treatment Facility**
Approval Signature **Thomas Neforas** **Laboratory Manager**
Date of IDR **August 25, 2011**

APPROVAL

PERMIT/REQUEST NUMBER **IDR 11-016 C**
FLOW **25000** gallons/day DATE: **August 29, 2011**

The Department of Environmental Services has reviewed and hereby approves the request as follows: Approval of the discharge to the applicant's wastewater facilities is based on review of the supporting information submitted and is subject to the conditions indicated below and the standard Conditions of Approval on the second page.

CONDITIONS:

Approval is for acceptance of highly treated wastewater from the wet flue gas desulfurization system. The wastewater will be hauled by tanker truck to the WWTF.

George F. Carlson, Jr., P.E.

Telephone (603) 271-2052

DES Web site: www.des.nh.gov

P.O. Box 95, 29 Hazen Drive, Concord, New Hampshire 03302-0095

Telephone: (603) 271-3503 • Fax: (603) 271-2982 • TDD Access: Relay NH 1-800-735-2964

NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES
INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST

CONDITIONS OF APPROVAL

The department's approval of this discharge request is subject to the following conditions:

- (1) The indirect discharger shall fully comply with the applicable sewer use ordinance;
- (2) The indirect discharger shall fully comply with all federal, state and local pretreatment standards and requirements;
- (3) Using additional water to dilute effluent or introducing uncontaminated water to the effluent shall not be allowed as a substitute for any pretreatment necessary to maintain compliance;
- (4) The indirect discharger shall not make changes in the type of production, amount of flow, or pollutant characteristics, or any increase in pollutant concentration, without prior approval by the department through the submission of a new industrial wastewater discharge request;
- (5) The approval shall be based on and apply only to the subject discharge request and all associated plans and supporting information as submitted and shall be signed by the indirect discharger's authorized representative; and
- (6) The approval shall become void if the discharge approved does not begin within one year from the date of approval.

Upon receipt of notification from the department that the discharge request is approved, the municipality shall issue a discharge permit to the indirect discharger.

If there are any question or comments concerning this approval, please contact the Industrial Pretreatment Section Supervisor, at the Water Division, telephone 271-2052.

Allenstown Wastewater Treatment Facility

**ALLENSTOWN WASTEWATER TREATMENT FACILITY
INDUSTRIAL DISCHARGE PERMIT - CLASS I**

PERMIT NO. HWIU-PSNH

In accordance with the provisions of the Allenstown Sewer Use Ordinance.

PERMITTEE:

Public Service Company of New Hampshire
Merrimack Station
97 River Road
Bow, NH 03304-3314

OWNER:

Public Service Company of New Hampshire
780 North Commercial St.
Manchester, New Hampshire 03301

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the Allenstown Publicly Owned Treatment Works (hereinafter referred to as AWTF), in accordance with the conditions set forth in this Permit. Compliance with this Permit does not relieve the permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under local, state, and federal statutes, including any such regulations, standards, requirements, or statutes that may become effective during the term of this permit.

Noncompliance with any term or condition of this Permit shall constitute a violation of the Allenstown, New Hampshire Sewer Use Ordinance and shall be subject to the penalty provisions therein.

This Permit is issued in accordance with the application endorsed on May 11, 2011 and in conformity with all plans, specifications and other applicable data submitted to the town in support of the above application.

This permit shall become effective on 11/10/2011 and shall expire at midnight on

11/9/2012

Permit Issued By:

Authorization:


Dana L. Clement, Superintendent, Allenstown WWTF

I, the undersigned, have received this Industrial Discharge Permit and understand that this document is not a contract. The terms and conditions contained herein are required by the Allenstown Sewer Use Ordinance and the principles of contract law recognized by the State of New Hampshire are not applicable. Additionally, the undersigned hereby agrees to abide by all present and future terms of the Sewer Use Ordinance.


Signature/Title, Industrial User Authorized Representative

11/9/2011
Date

THIS PERMIT CONTAINS THE FOLLOWING PARTS

<u>Cover Page</u>	<u>Discharge Limitations</u>	<u>Monitoring Requirements</u>
<u>Reporting Requirements</u>	<u>Special Conditions</u>	<u>Compliance Schedule</u>
<u>Standard Conditions</u>	<u>Definitions</u>	

Allenstown Wastewater Treatment Facility

PART 1 - DISCHARGE LIMITATIONS- PSNH Merrimack Station.

- A. During the effective period, the permittee is authorized to discharge wastewater to the Allenstown, New Hampshire sewer system from the outfall(s) listed below. Discharge must comply with the Allenstown Sewer Use Ordinance.

Outfall	Descriptions
PSNH Merrimack Station	Highly treated wastewater from wet flue gas desulfurization system

- B. During the effective period, the discharge from the outfalls listed above shall not exceed the the following limitations:

Permitted Flows (GPD) by Process at Outfall(s)

	Daily Maximum	Monthly Average
Sanitary	0	0
Pretreated Process	100,000	3,000,000
Process 3	0	0
Process 4	0	0
Process 5	0	0
Total Flow, GPD	100,000	3,000,000

Mass Limits Pounds/Day (Day Max/ Month Avg)

Parameter	Limitations (milligrams per liter, except as noted)		
	Daily Maximum	Monthly Average	
Biochemical Oxygen Demand §	15	10	12.5 / 250.2
Oil & Grease §	15	10	12.5 / 250.2
pH (standard units)	8	6.5 - 8.0	
Total Suspended Solids §	15	10	12.5 / 250.2
Total Dissolved Solids §	20000	16000	16680 / 400320
§			- / -
§			- / -
§			- / -
Total Toxic Organics (VOC Fraction) §	2.13	2.13	1.8/53.3
Arsenic §	0.06	0.03	0.05/0.75
Cadmium §	0.11	0.07	0.09 / 1.75
Chromium (total) §	0.2	0.15	0.17 / 3.75
Copper §	0.08	0.0625	0.07 / 1.56
Cyanide, Total §	0.01	0.01	0.01 / 0.25
Lead §	0.1	0.08	0.08 / 2.00
Mercury §	0.002	0.0015	0.002 / 0.038
Molybdenum §	**	**	- / -
Nickel §	1	0.85	0.83 / 21.27
Selenium §	3	2.5	2.50 / 62.55
Silver §	0.05	0.04	0.04 / 1.00
Zinc §	1	0.5	0.83 / 12.51

§ Screening levels

* Self-monitoring reports are required for these parameters. See Part 2 (A), Page 5 of the permit.
Mass limits: Day Max based on Daily Maximum Permitted Flow and Daily Maximum concentration limit;
Month Avg based on Monthly Average Permitted Flow and Monthly Average concentration limit.

** Monitor Only

Allenstown Wastewater Treatment Facility

C. General Prohibitions - An Industrial User shall not introduce into the AWTF pollutants which cause Pass Through or Interference.

D. Specific Prohibitions - During the effective period of this permit, the Permittee is authorized to discharge process wastewater to the AWTF from the points identified in **Part 1 Section A**, whose effluent characteristics shall be at or below the concentration-based and mass-based screening values listed in **Part 1 Section B**.

The permittee shall comply with all prohibited discharges of the Sewer Use Ordinance and comply with all State and federal pretreatment standards and requirements. This shall include but not be limited to the following:

1. Any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquid, gas or solid, or any substance which may generate or form any flammable, explosive, or combustible substance, fluid, gas, vapor, or mixture when combined with air, water, or other substances found in sewers. This includes but is not limited to pollutants which cause an exceedance of ten percent of the lower explosive limit (LEL) at any point in the POTW or with a closed cup flashpoint of less than 140 degrees Fahrenheit.
2. Any waters or wastewaters having a pH lower than 6.5 or higher than 8.0 or having any other corrosive property which may be capable of causing damage or hazard to structures, equipment, and/or personnel of the sewage works, or with acidity or alkalinity in such quantities that the town believes may cause, alone or in combination with other discharges, interference or pass-through.
3. Any solid or viscous substances, including waters or wastewaters which contain fats, wax, greases or oils, or any substances, whether emulsified or not, which may solidify or become viscous at a temperature between 32 degrees Fahrenheit and 150 degrees Fahrenheit, in quantities or of such size capable of causing obstruction to the flow in sewers or causing other interference with the proper operation of the sewage works.
4. Any waters or wastewaters containing pollutants which result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause acute worker health and safety problems.
5. Any waters or wastewaters having a temperature higher than 150 degrees Fahrenheit (65 degrees Celsius) or heat in amounts which will inhibit biological activity in the sewage treatment plant resulting in interference, but in no case heat in such quantities that the temperature of the sewage treatment plant influent exceeds 104 degrees Fahrenheit (40 degrees Celsius).
6. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil in amounts that will cause interference or pass through.
7. Any waters or wastes containing odor-producing substances exceeding limits which may be established by the town.
8. Any radioactive wastes or isotopes of such half-life or concentration as may exceed limits established by the town or by applicable State or federal regulations.
9. Any quantities of flow, concentrations, or both which constitute a "slug" as defined herein.

E. Removed Substances - Solids, sludges, or other pollutants removed in the course of treatment or control of wastewater shall be disposed of in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act, as well as in accordance with all applicable State and local requirements.

F. Dilution Prohibited - The permittee shall not increase the use of process water, or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a pretreatment standard or requirement, with the exception of temperature.

Allenstown Wastewater Treatment Facility

G. Uncontaminated Water - No sanitary sewer shall be used to receive and convey or dispose of any storm or surface water, or any other uncontaminated or unpolluted drainage. These shall be discharged into storm drains, or to a natural outlet, as approved by the town and in accordance with any NPDES permitting requirements.

PART 2 - MONITORING REQUIREMENTS

A. Scheduled Monitoring and Reporting - Sampling and measurements as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit. Monitoring points shall not be changed without notification to and approval from the AWTF Superintendent. Analysis shall be performed by an independent professional laboratory. Such laboratory shall be approved by the AWTF Superintendent. Cost to perform analytical services shall be paid by the permittee. From the period beginning on the effective date of the permit, representative samples shall be collected and analyzed not less frequently than indicated in the following table.

PARAMETER	FREQUENCY ⁽¹⁾	SAMPLE TYPE / LOCATION	DATE(S) REPORTS DUE
Quantity (Tons)	Each Truckload	AWTF Truck Scale	N/A
As, Cd, Cr, Cu, Pb, Mo, Hg, Ni, Se, Ag, Zn	Weekly for 1 st Month. 1 st sample required on first load. Reduced to Monthly if compliance is demonstrated	Grab ⁽²⁾ / End of pretreatment process or directly from delivery trucks	15 th of Month following analysis
Cyanide	Monthly, 1 st sample required on first load.	Grab ⁽²⁾ / End of pretreatment process or directly from delivery trucks	15 th of Month following analysis
BOD ⁵ , TSS, TDS	Monthly, 1 st sample required on first load.	Grab ⁽²⁾ / End of pretreatment process or directly from delivery trucks	15 th of Month following analysis
Oil & Grease	Monthly, 1 st sample required on first load.	Grab ⁽²⁾ / End of pretreatment process or directly from delivery trucks	15 th of Month following analysis
Volatile Organics (VOC method 624 USEPA)	Every other month, 1 st sample required on first load.	Grab ⁽²⁾ / End of pretreatment process or directly from delivery trucks	15 th of Month following analysis
pH ⁽⁴⁾	Once per Load for 1 st 2 weeks. Frequency may be lessened once stability of process is established	Grab ⁽²⁾ / End of pretreatment process or directly from delivery trucks	Upon delivery of load
Narrative Statement	Statement identifying: Source of process wastewaters; Maximum and average daily flows from these processes ⁽¹⁾ Compliance status with applicable pretreatment standards and if not in compliance, then what additional operation and maintenance practices and/or pretreatment are necessary.		December 31

NOTES:

- (1) Flow reports shall consist of total daily flows in gallons per day.
- (2) Samples may consist of grab samples collected from the end of the pretreatment process, the pumping system filling the delivery trucks, or directly from the delivery trucks.
- (3) If the permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or as specified in this permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and the results shall be included in reports.
- (4) pH shall be analyzed by the permittee using approved methods (See PART 2, E) and shall be representative of each load.

Signatory Requirements - All reports shall be signed by an Authorized Representative as defined in the definitions section of this permit.

Allenstown Wastewater Treatment Facility

Certification - Signed reports shall include the following statement: "I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

B. Monitoring Scheduling Requirements - Monitoring performed to satisfy the first reporting requirement of this permit shall be performed upon the first delivery under this permit.

Annual monitoring performed in subsequent years shall be performed within the first six months of the permit year.

The scheduling of sampling events and sample protocol is subject to approval by the AWTF. The permittee shall contact the AWTF at least five working days in advance of all proposed sampling events in order to obtain approval for an actual sampling date and protocol.

C. Re-sampling - If sampling performed indicates an exceedance of a screening level, the town shall be notified within 24 hours of the permittee becoming aware of the exceedance, in accordance with Part 3 (D) of this permit. The permittee is required to repeat the sampling and analysis and submit the results of the repeat analysis to the AWTF within 30 days after becoming aware of the exceedance, except the re-sampling is not required if the permittee samples at least once a month or the AWTF has sampled between the time when the initial sampling was performed and the time when the permittee received the results of this sampling.

D. Effluent Monitoring Devices - If effluent monitoring is required by this permit, then the following shall apply:

1. The appropriate devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of monitored discharges.
2. All monitoring devices and sampling stations must be approved by the AWTF
3. The devices shall be installed, calibrated, and maintained to ensure the measurements are consistent with the accepted capability of that type of device and shall demonstrate the accuracy of the monitoring devices upon the request of the AWTF Superintendent.
4. The permittee shall accept the estimates of quantities of wastewater flows and other parameters, as established by the AWTF, during all periods in which required devices fail to operate properly. Quantitative estimates shall be mutually agreed upon by AWTF and the Permittee.

E. Sampling and Analytical Methods - Any sampling, preservation, handling, and analytical methods used must conform to 40 CFR Part 136 and amendments thereto, unless otherwise approved by EPA, or as specified in this permit.

F. Additional Monitoring by the Permittee - If sampling of any pollutant is performed more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136, then the results of this monitoring shall be included in the permittees effluent monitoring report or as required by the AWTF.

PART 3 - REPORTING REQUIREMENTS

A. Verbal Reporting - Verbal notification as required in this permit shall be directed to the following unless otherwise noted in a specific section:

1. During normal business hours.
AWTF Superintendent (603) 485-5600
2. At all other times, notify:

Allenstown Wastewater Treatment Facility

AWTF Superintendent (603) 340-6888
On-Call AWTF Operator (603) 340-1400

B. Written Reporting - All written reports required by this permit shall be submitted to the AWTF at the following address:

Allenstown Wastewater Treatment Facility
35 Canal St.
Allenstown, New Hampshire 03275

C. Effluent Monitoring Reports - Industrial Users shall submit periodic reports as required in **Part 2, Section A - Scheduled Monitoring and Reporting**. These reports may require:

1. Information indicating the nature and concentration of pollutants in the discharge from the regulated processes governed by pretreatment standards;
2. Maximum and daily flow for these process units;
3. Statements on compliance with applicable pretreatment standards on a consistent basis, and if not, what additional operation and maintenance practices and/or pretreatment are necessary; and
4. Complete sampling and analytical laboratory records.

D. Exceedance of Effluent Screening Levels - Reporting - In the event that effluent monitoring indicates an exceedance, the AWTF Superintendent, or other available representative identified in **Section A** above, shall be verbally notified within 24 hours after the permittee becomes aware of the exceedance. A written follow-up report signed by an authorized representative shall be filed with the AWTF within five (5) days. The report shall specify:

1. Description of the noncompliance, cause of the occurrence, and its impact on the permittees compliance status;
2. Anticipated time the condition of noncompliance is expected to continue, or if such conditions have been corrected, the duration of the period of noncompliance;
3. Steps taken by the permittee to reduce and eliminate the non-complying discharge; and
4. Steps taken by the permittee to prevent recurrence of the condition of noncompliance.
5. If a screening level is periodically exceeded, an evaluation shall be conducted to determine if the screening level should be adjusted to account for actual conditions.

E. Spills, Potentially Harmful Discharges - Reporting - Immediate notification by the permittee is required upon the occurrence of an accidental discharge of substances prohibited by the Sewer Use Ordinance or any slug loads or spills that may enter the public sewer. This shall also include immediate notification of any discharge which has the potential to cause a problem for the AWTF.

Verbal notification shall be made to the parties identified in **Part 3, Section A** above. The notification shall include location of discharge, date and time thereof, type of waste (including concentration and volume), and corrective actions taken. The permittees notification in accordance with the requirements of this section does not relieve it of other reporting requirements that arise under local, State, or federal laws.

Within five (5) days following an accidental discharge, the permittee shall submit to the AWTF a detailed written report signed by an authorized representative. The report shall specify:

1. The description and cause of the slug load or accidental discharge and the impact on the permittees compliance status. The description shall also include the location of discharge and the type, concentration, and volume of waste;

Allenstown Wastewater Treatment Facility

2. The duration of the period of the discharge, including exact dates and time of the discharge, and if the discharge is continuing, the time by which control of the discharge and compliance is reasonably expected to occur;
3. All steps taken by the permittee to reduce and eliminate the slug load, accidental discharge, or other potentially harmful discharge; and
4. Steps to be taken by the permittee to prevent recurrence of the condition of noncompliance.

F. Operating Upset/Bypass Report - In the event the permittee is unable to comply with any of the conditions of this permit due to a breakdown of pretreatment facilities or emergency bypass, the permittee shall provide an immediate verbal report to the parties identified in **Part 3, Section A**. A written follow-up report signed by an authorized representative shall be filed with the AWTF within five (5) days. The report shall contain the same information as required for the written report in **Part 3, Section C** above.

G. Changed Discharge Reporting - The permittee shall report changes in the nature and/or volume of the discharge pursuant to **Part 6, Section I** of this permit.

H. Effluent Monitoring Records - The permittee shall retain records of all monitoring information, including all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample measurement, report, or application.

All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities shall be retained and preserved by the permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

If samples are collected, such records shall include for each sample:

1. The date, exact place, time, and methods of sampling or measurements, and sample preservation techniques or procedures;
2. The name of the analytical laboratory performing the analyses;
3. Who performed the sampling or measurements;
4. The date(s) analyses were performed;
5. Who performed the analyses;
6. The EPA-approved method reference number for each analyte reported;
7. The full name of each analyte, including whether results are total or dissolved;
8. The results of such analyses;
9. Quality assurance information performed by the laboratory indicating if quality assurance results were acceptable;
10. The method detection limit for each analyte reported;
11. Units in which results are expressed; and
12. A copy of the chain-of-custody forms, properly completed, which accompany all samples submitted to the laboratory.

I. Falsifying information - Knowingly making any false statement on any report or other document required by this permit and/or knowingly rendering any monitoring device or method inaccurate is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

J. Duty to Provide Information - The permittee shall furnish to the AWTF within 15 days any information which the AWTF may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The permittee shall also, within 15 days of receipt of a request from AWTF, furnish to the AWTF copies of any records required to be kept pursuant to this permit.

Allenstown Wastewater Treatment Facility

K. Anticipated Noncompliance - The permittee shall give advance notice to the AWTF of any planned changes in the permitted facility or activity which may result in noncompliance with the requirements of this permit.

L. Signatory Requirements - All applications, reports, and information submitted to the AWTF as a requirement of this permit shall be signed by an Authorized Representative of the permittee.

PART 4 - SPECIAL CONDITIONS

- A. Permittee shall be responsible for all costs incurred by AWTF to facilitate delivery of permittees waste stream. AWTF shall provide estimated costs for any improvements or modifications needed for Permittees approval, prior to proceeding with said improvements or modifications.
- B. Permittee shall only utilize haulers approved by the AWTF for transportation of waste to the AWTF.
- C. Permittee shall be charged the effluent rate in use at the time of delivery until such time as the properties of the waste changes due to permittees use of equipment to concentrate the waste. Current effluent rate is \$7.19/Ton (\$0.03/gallon).
- D. When permittee concentrates its waste the rate shall revert to the septage rate in use at the time of delivery, provided there are no issues associated with accepting the concentrated waste.
- E. Acceptance of permittees waste shall in no way effect AWTF's existing or future NPDES permits.

PART 5 - COMPLIANCE SCHEDULE

No later than fourteen (14) calendar days following the date identified in the following schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific action being required by identified dates, a written notice of compliance or noncompliance. In the last case, the notice shall include the cause of noncompliance, any remedial actions taken, and the date on which it expects to comply with the increment of progress. The permittee shall accomplish the following tasks in the designated time period:

EVENT
N/A

NO LATER THAN
N/A

PART 6 - STANDARD CONDITIONS

A. Severability - The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit, to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

B. Duty to Comply - All discharges authorized herein shall be consistent with the terms and conditions of this permit and the Allenstown Sewer Use Ordinance. Failure to comply with the requirements of this permit may be grounds for revocation, administrative action or enforcement proceedings, including civil or criminal penalties, injunctive relief, and summary abatements, as provided for in the Allenstown Sewer Use Ordinance, RSA 149:19, and/or the Federal Clean Water Act.

C. Duty to Mitigate - The permittee shall take all reasonable steps to minimize or correct any adverse impact to the AWTF or the environment resulting from noncompliance with this permit including, but not limited to:

- 1. Accelerated or additional monitoring;
- 2. Halting or reducing production activities;
- 3. Providing alternate methods of treatment; and/or
- 4. Halting or reducing discharges.

Upon reduction of efficiency of operation or loss or failure of all or part of the treatment facility, the permittee shall, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment

Allenstown Wastewater Treatment Facility

facility fails or is reduced. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

D. Permit Modification, Suspension, Revocation - After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for causes including, but not limited, the following:

1. To incorporate any new or revised federal, State, or local pretreatment standards or requirements;
2. Material or substantial alterations or additions to the permittees operation processes, or discharge volume or character, which were not considered in drafting the effective permit;
3. A change in any condition of either the Industrial User or the AWTF that requires either a temporary or permanent reduction or elimination of the authorized discharge;
4. Information indicating that the permitted discharge poses a threat to the collection and treatment systems, AWTF personnel, or the receiving waters;
5. Violation of any terms or conditions of this permit or the Allenstown Sewer Use Ordinance;
6. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;
7. Revision of, or a grant of, variance from such categorical standards pursuant to 40 CFR 403.13;
8. To correct typographical or other errors in the permit;
9. To reflect transfer of the facility ownership and/or operation to a new owner/operator;
10. Upon request of the permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations;
11. Tampering with monitoring equipment;
12. Refusing to allow timely access to the facility premises and records;
13. Failure to pay fees, fines, or charges;
14. Failure to meet compliance schedules; and
15. To incorporate any new or revised requirements developed by the AWTF as are necessary to ensure AWTF compliance with its NPDES permit and/or applicable sludge management requirements promulgated by the U.S. EPA or State of New Hampshire.
16. To incorporate revised monitoring requirements in **Part 2, Section A**.

The filing of a request by the permittee for a permit modification, revocation, and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

E. Permit Appeals - The permittee may petition to appeal the terms of this permit within thirty (30) days of the effective date.

This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to be placed in the permit.

The effectiveness of this permit shall not be stayed pending reconsideration. The AWTF Superintendent's decision not to reconsider a final permit shall be considered final administrative action for purpose of judicial review. The permittee seeking judicial review of the AWTF Superintendent's final action must do so by filing a complaint with the District Court for Merrimack County within the State of New Hampshire.

Allenstown Wastewater Treatment Facility

F. Property Rights - The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any damage to private property or any invasion of personal rights, nor any violation of federal, State, or local laws or regulations.

G. Change in Ownership - In the event that the permittee undergoes a major change in ownership of either its corporate voting stock or control of its corporate stock or of the building to which this permit relates, then the permit may be reassigned or transferred if:

1. At least thirty (30) days advance notice is provided to the AWTF.
2. The new owner provides written notice that there is no immediate intent to change the facility's operations and processes, and identifies the specific date on which the transfer is to occur; and
3. The new owner acknowledges full responsibility for complying with the terms of this permit.

H. Re-permitting - If the permittee desires to continue to discharge after the expiration of this permit, it shall reapply on the application forms then in use at least sixty (60) days before this permit expires. Under no circumstances shall the permittee continue to discharge without an effective permit. An expired permit will continue to be effective and enforceable until the permit is reissued if:

1. The Industrial User has submitted a complete permit application at least sixty (60) days prior to the expiration date of the user's existing permit; and
2. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the Industrial User.

I. Changes in Discharge - Approval for modifications, additions, and/or expansions that increase or decrease the quality and/or quantity of wastewater discharged to the AWTF must be requested in writing to the Superintendent at least sixty (60) days prior to the proposed starting date for the change. This permit may then be modified or reissued to reflect such changes. No change in the permittees discharge may be made unless reported to and approved by the AWTF and State of New Hampshire Department of Environmental Services. ~~In no case shall new connections, increased flows, or significant changes in effluent quantity and/or quality be permitted if such will cause an exceedance of the effluent screening levels specified herein.~~

J. Compliance with Applicable Pretreatment Standards and Requirements - Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all applicable local, State, and federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

K. Confidential Information - Except for data determined to be confidential or proprietary, all information required for and by this permit shall be available for public inspection.

L. Proper Operation and Maintenance - The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

M. Flow Measurements - If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

N. Bypass of Treatment Facility

Allenstown Wastewater Treatment Facility

1. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury or severe property damage or no feasible alternatives exist.
2. The permittee may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation.
3. Notification of Bypass
 - a. Anticipated bypass. If the permittee knows in advance of the need for bypass, it shall submit prior written notice to the AWTF at least ten (10) working days in advance.
 - b. Unanticipated bypass. The permittee shall immediately verbally notify the AWTF and submit a written notice within five (5) working days. The report shall specify:
 - A description of the bypass, its cause and duration;
 - Whether the bypass has been corrected; and
 - The steps being taken to reduce, eliminate, and prevent a recurrence of the bypass.

O. Inspection and Entry - The permittee shall allow authorized AWTF personnel, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the permittees premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;
4. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any locations; and
5. Inspect any production, manufacturing, fabricating, or storage area where pollutants regulated under the permit could originate, be stored, or be discharged to the sewer system.

P. Civil and Criminal Liability - Nothing in this permit shall be construed to relieve the permittee from civil and/or criminal penalties for noncompliance under local, State, or federal laws or regulations.

Q. Remedies - The AWTF reserves all rights and remedies that it has under or by reason of any statutory law, ordinance, or common law to enforce any condition of this permit, including, but not limited to:

1. Civil and/or criminal penalties;
2. Recovery of expenses incurred as a result of noncompliance;
3. Permit revocation;
4. Emergency action to halt or prevent any imminently harmful discharge;
5. Fines and/or imprisonment; and
6. Newspaper publication of significant violators.

R. Other Requirements - The conditions listed in this permit are not intended to be all inclusive. The AWTF shall be notified if questions arise regarding the permittees responsibilities. The AWTF reserves the right to make revisions to this permit in order to implement the requirements of the Allenstown Sewer Use Ordinance.

PART 7 - DEFINITIONS

Act or "the Act" - The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. § 1251 *et seq.*

Authorized Representative - An authorized representative shall be:

Allenstown Wastewater Treatment Facility

- a. (i) A president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or
(ii) The manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- b. By a general partner or proprietor if the Industrial User is a partnership or sole proprietorship respectively.
- c. By a duly authorized representative of the individual designated in paragraph (a) or (b) of this section if:
- (i) The authorization is made in writing by the individual described in paragraph (a) or (b); (ii) The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
(iii) The written authorization is submitted to the AWTF
- d. If an authorization under paragraph (c) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of paragraph (c) of this section must be submitted to the AWTF prior to or together with any reports to be signed by an authorized representative.

Biochemical Oxygen Demand (BOD) - The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures for five (5) days at 20° Centigrade, usually expressed as a concentration (e.g., mg/l), as determined by 40 CFR Part 136.

Categorical Pretreatment Standard or Categorical Standard - Any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307(b) and (c) of the Act (33 U.S. C. § 1317) which apply to a specific category of users and which appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.

Chain-of-Custody - A form documenting the handling of samples from the time of collection to the time received by the laboratory. Information required includes time and date sampled, sampler identification, location, all individuals handling the sample, times and dates of transfers and any other information necessary to document the validity of the sample.

Town - Shall mean the Town of Allenstown, New Hampshire or the Town of Pembroke, New Hampshire whichever is applicable.

Daily Maximum - The maximum allowable discharge of pollutant or flow during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of concentration, the daily maximum is the measurement of representative sample(s) obtained as specified in Part 2, Section A of this permit.

Environmental Protection Agency or EPA - The United States Environmental Protection Agency or, where appropriate, the Regional Water Management Division Director, or other duly authorized official of said agency.

Flow Recorder - Shall mean a weir, meter of flume, or other device which will measure and record the volume of wastewater discharged.

Hazardous Substance - Any substance designated under 40 CFR Part 116 pursuant to Section 311 of "the Act."

Allenstown Wastewater Treatment Facility

Industrial User - Shall mean any person contributing any non-domestic source of pollutants into the POTW.

Industrial (Process) Wastewater - The wastewater from industrial processes, trade, or business as distinct from domestic or sanitary sewage.

Interference - A discharge, which alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the AWTF, its treatment processes or operations or its sludge processes, use, or disposal; and, therefore, is a cause of a violation of the town's NPDES permit or of the prevention of sewage sludge use or disposal in compliance with any of the following statutory/regulatory provisions or permits issued there under, or any more stringent State or local regulations: Section 405 of the Act; the Solid Waste Disposal Act, including Title II commonly referred to as the Resource Conservation and Recovery Act (RCRA); any State regulation contained in any State sludge management plan prepared pursuant to Subtitle D of the Solid Waste Disposal Act; the Clean Air Act; the Toxic Substances Control Act; and the Marine Protection, Research, and Sanctuaries Act.

Town Wastewater Department - shall mean an authorized agent of the Allenstown Sewer Commission established to operate and maintain the town's Wastewater Treatment Facilities.

Lower Explosive Limit (LEL) - This refers to the lowest concentration of gas or vapor (% by volume in air) that will burn or explode if an ignition source is present and at ambient temperatures.

Monthly Average - The arithmetic mean for effluent samples collected during a calendar month or specified 30-day period.

Method Detection Limit - The minimum concentration of a substance that can be measured and reported as defined and determined in 40 CFR, Part 136, Appendix B.

NHDES - New Hampshire Department of Environmental Services.

NPDES - National Pollutant Discharge Elimination System; the national program for issuing and enforcing permits for the discharge of pollutants from any point source into waters of the United States, under Sections 402, 318, and 405 of the Clean Water Act.

Pass Through - A discharge which exits the AWTF into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the town's NPDES permit, including an increase in the magnitude or duration of a violation.

Permittee - The person or legal entity named on page 1 of this permit.

Pretreatment (Treatment, Treat) - The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to, or in lieu of discharging or otherwise, introducing such pollutants into the AWTF.

Pretreatment Standards (Standards, Effluent Limitations) - Shall mean prohibited discharge standards, categorical pretreatment standards, and local limits.

Priority Pollutants - A group of toxic chemicals listed by the EPA in 40 CFR Part 403, Appendix B as requiring restriction from entering municipal sewers or any receiving waters.

Prohibited Discharge Standards or Prohibited Discharges - Absolute prohibitions against the discharge of certain substances; these prohibitions appear in the Sewer Use Ordinance and 40 CFR 403.5(b).

Sewer Use Ordinance - This refers to the Sewer Use Ordinance for the Town of Allenstown.

Publicly Owned Treatment Works (POTW) - The treatment works owned by the Town (referred to as AWTF). This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances which convey wastewater to the AWTF treatment plant.

Allentown Wastewater Treatment Facility

Sample - Shall mean a portion of the wastewater obtained for analytical purposes. This portion may be:

a. **Composite Sample** - A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a:

(i) **Time Composite** - Composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or

(ii) **Flow Proportional Composite** - Collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between aliquots.

b. **Grab Sample** - An individual sample collected in less than 15 minutes without regard to flow or time.

Sampler - A device used with or without flow measurement to obtain a portion of water or wastewater for analytical purposes. May be designed for taking single (grab), composite samples, continuous samples, or periodic samples.

Sampling Station - A specified location where monitoring takes place on a regular basis.

Sanitary (Domestic) Wastewater - Shall mean normal wastewater from household and toilet wastes discharged from any improved property, excluding ground, surface, or storm water.

Screening Level - Shall mean the concentration of a pollutant which under baseline conditions has the potential to impact the operation of the AWTF treatment process and/or the quality of its treated effluent.

Shall - is mandatory; **May** - is permissive.

Significant Industrial User -

a. A user-subject-to-categorical-pretreatment-standards; or

b. A user that:

(i) Discharges an average of twenty-five thousand (25,000) gallons per day or more of process wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler blowdown wastewater);

(ii) Contributes a process waste stream which makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or

(iii) Is designated as such by the AWTF on the basis that it has a reasonable potential for adversely affecting the AWTF's operation or for violating any pretreatment standard or requirement.

Suspended Solids (SS) - Shall mean the solids that either float on the surface of, or are in suspension in, wastewater and which are largely removable by laboratory filtering, as determined by 40 CFR part 136.

Slug Load or Slug - Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge, at a flow rate or concentration which would cause a violation of the prohibited discharge standards in the Sewer Use Ordinance or 40 CFR 403.5(b).

Slug Control Plan - A plan prepared by an Industrial User to control slug discharges. Elements of the plan include: description of discharge practices, description of stored chemicals, procedures for notifying the POTW of slug discharges, and procedures to prevent adverse impact from accidental spills.

Standard Industrial Classification (SIC) Codes - A four-digit code number which classifies individual business firms. SIC code listings are published by the United States Office of Management and Budget. See *Standard Industrial Classification Manual*, Superintendent of Documents, United States Government Printing Office, Washington, D.C. 20402.

Superintendent - The person designated by the Allentown Sewer Commission to supervise the operation of the AWTF, and who is charged with certain duties and responsibilities, or a duly authorized representative.

Allenstown Wastewater Treatment Facility

Wastewater Treatment Plant or Treatment Plant (WWTP / WWTF)- That portion of the AWTF which is designated to provide treatment of municipal sewage and industrial waste.

- BLANK PAGE -



Thomas S. Burack, Commissioner

APPLICANT

Indirect Discharger **PSNH**

Address **97 River Rd., Bow, NH**

Authorized Signature **Harold Keyes** **Station Manager**

Engineer **Ronald Breton, GZA GeoEnvironmental**

Municipality/POTW	<u>Allenstown WWTF</u>	
Approval Signature	Dana L Clement	Superintendent
Date of IDR	July 25, 2011	

APPROVAL

PERMIT/REQUEST NUMBER IDR 11-016 A

FLOW 100000 gallons/day DATE: August 12, 2011

The Department of Environmental Services has reviewed and hereby approves the request as follows: Approval of the discharge to the applicant's wastewater facilities is based on review of the supporting information submitted and is subject to the conditions indicated below and the standard Conditions of Approval on the second page.

CONDITIONS:

Approval is for acceptance of highly treated wastewater from the wet flue gas desulfurization system. The wastewater will be hauled by tanker truck to the WWTF.

George F. Carlson, Jr., P.E.

Telephone (603) 271-2052

NEW HAMPSHIRE DEPARTMENT OF ENVIRONMENTAL SERVICES
INDUSTRIAL WASTEWATER INDIRECT DISCHARGE REQUEST

CONDITIONS OF APPROVAL

The department's approval of this discharge request is subject to the following conditions:

- (1) The indirect discharger shall fully comply with the applicable sewer use ordinance;
- (2) The indirect discharger shall fully comply with all federal, state and local pretreatment standards and requirements;
- (3) Using additional water to dilute effluent or introducing uncontaminated water to the effluent shall not be allowed as a substitute for any pretreatment necessary to maintain compliance;
- (4) The indirect discharger shall not make changes in the type of production, amount of flow, or pollutant characteristics, or any increase in pollutant concentration, without prior approval by the department through the submission of a new industrial wastewater discharge request;
- (5) The approval shall be based on and apply only to the subject discharge request and all associated plans and supporting information as submitted and shall be signed by the indirect discharger's authorized representative; and
- (6) The approval shall become void if the discharge approved does not begin within one year from the date of approval.

Upon receipt of notification from the department that the discharge request is approved, the municipality shall issue a discharge permit to the indirect discharger.

If there are any question or comments concerning this approval, please contact the Industrial Pretreatment Section Supervisor, at the Water Division, telephone 271-2052.

Kevin A. Sheppard, P.E.
Public Works Director

Timothy J. Clougherty
Deputy Public Works Director

Frederick J. McNeill, P.E.
Chief Engineer



Commission
Raymond Hebert
Harold Sullivan
Robert R. Rivard
Rick Rothwell
Bill Skouteris

CITY OF MANCHESTER
Highway Department
Environmental Protection Division

Trucked Waste Special Agreement No. SA 3001-10-11

In accordance with the provisions of the City of Manchester's Special Agreement Provisions:

Office/Home
PSNH
780 North Commercial St.
Manchester, NH 03101

Work Site
PSNH – Merrimack Station
97 River Street
Bow, NH 03304

is authorized to discharge wastewater from the above stated facility (the "Facility"). This discharge consists of:

Description
Treated Blowdown from Flue Gas Desulfurization (FGD) System

Gallons/Day
24,750 gallons per day




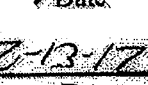
Compliance with this Special Agreement does not relieve the owner of its obligation to comply with any other applicable pretreatment requirements under local, State, or Federal laws, including such requirements that may become effective during the term of this Agreement.

Noncompliance with any term or condition of this Agreement including the provisions of Page 2 and 3 shall constitute a violation of the City's Sewer Use Ordinance ("Sewer Use Ordinance") and shall be subject to the penalty provisions of Article V, Section 52.999 and may include suspension of discharge privilege with 24 hours notice.

This Special Agreement shall become **Effective on:**
This Special Agreement shall **Expire on:**


December 1, 2011

November 30, 2012

	Chief Engineer – EPD	
Special Agreement Issued By	Title	Date
	Public Works Director - Highways	
Authorization by (City)	Title	Date

Acknowledgement: The undersigned acknowledges receipt of this Special Agreement and acknowledges that this discharge is subject to the requirements of the Sewer Use Ordinance Article V.

PSNH
Company Name


Authorized Representative


Date

Standard Conditions

This agreement is subject to the following standard conditions.

Acceptance of discharge – The FGD blowdown must first be turned away in part, or in total, by the Towns of Hooksett, Allenstown and the City of Concord before discharge is accepted at EPD's Manchester WWTP.

Responsible contact – PSNH must designate one main responsible contact (Shift Supervisor 224-4081 x4141) and provide their 24- hour phone number along with an alternate person (Paul Raichle 225-5571) and their 24- hour contact information who can act on behalf of PSNH in emergency situations.

Tanker delivery – PSNH must use dedicated tankers or tankers that have been rinsed internally and certified "industrial clean" by the tanker truck owner so no other discharge is inadvertently disposed of at Manchester's WWTP.

Delivery hours – The hours of delivery shall be from Monday through Friday from 6:00 AM until 4:00 PM and on weekends and holidays from 7:00 AM until 2:00 PM. Hours outside these times may be agreed to in writing by both parties and amended to this agreement.

Changes in discharge – Any substantial change in the type of production, amount of flow or pollutant characteristics, or any increase in pollutant concentration, must receive prior review and approval by the City of Manchester and the State of NH if applicable. The projected wastewater characteristics were presented in the Industrial Wastewater Discharge Permit application submitted to the City of Manchester in May 2011.

Spills, potentially harmful dischargers – Immediate notification is required for any discharge which spills at the offloading facility that would cause a problem for the Wastewater Treatment Plant's Stormwater Permit or other environmental concerns. This includes but is not limited to an accidental discharge of substances prohibited by the Sewer Use Ordinance or any slug loads or spills that may enter the public, right-of-way, receiving water, or combined sewers. Notification information as follows:

- * During normal business hours (7:00 A.M. to 4:00 P.M.) notify:

Chief Sanitary Engineer	624-6341
Wastewater Plant Superintendent	624-6526
Industrial Pretreatment Office	624-6513
- * At all other times notify:

Wastewater Treatment Plant	624-6421
----------------------------	----------

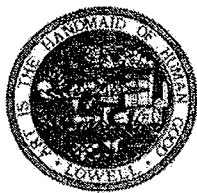
The notification shall include location of discharge, date and time thereof, type of waste, including concentration and estimated volumes, and any and all corrective actions taken. The owner will make notification in accordance with the requirements of this section and does not relieve its obligation of other reporting requirements as may arise under local, State, or Federal laws.

Agreement continuance – If the owner desires to continue to discharge after the expiration of this Agreement, it shall reapply on the application forms then in use at least thirty (30) calendar days before this Agreement expires. Under no circumstances shall the owner continue to discharge after the expiration of this Agreement, except as authorized pursuant to a new agreement with, or an extension of this Agreement by, the City.

Access by the City – The owner shall allow authorized EPD personnel unrestricted access for the purposes of inspection, investigation, and sampling of wastewater discharges from the PSNH Work Site when requested.

Sampling & analytical requirements – Any sampling, preservation, handling, and analytical testing methods must conform to the requirements as set out in 40 CFR Part 136.

Charges and rates – The rate is based upon mass loading. The daily allowable loading for aluminum is 0.21 lbs and for selenium it is 0.6025 lbs. As aluminum and selenium are the main concerns in the FGD concentration the rate is based on loading for both aluminum at \$3,213.25 per pound, or the rate for selenium at \$1,066.80 per pound. The total fee will be based on the highest of the aluminum or selenium loading, but not on both. This is not a fee based on per 1,000 gallon discharge, but rather on the mass loading of aluminum and selenium.



MARK A. YOUNG
EXECUTIVE DIRECTOR

LOWELL REGIONAL WASTEWATER UTILITY

WASTEWATER COLLECTION AND TREATMENT



SERVING
LOWELL
CHELMSFORD
DRACUT
TEWKSBURY
TYNGSBORO

September 28, 2011

Allan Palmer
Public Service of New Hampshire
97 River Road
Bow, NH 03304

Mr. Palmer,

The Lowell Regional Wastewater Utility (the "Utility") is in receipt of permit application materials requesting authorization to discharge hauled wastewater generated from the Flue Gas Desulfurization (FGD) system at the Public Service of New Hampshire's Bow facility.

After reviewing your request and visiting your facility, the Utility is granting an Interim Discharge Authorization (IDA) to Public Service of New Hampshire for Six (6) Months beginning on October 1, 2011, a formal request must be submitted before the expiration date should an extension be necessary. The IDA authorizes the discharge of hauled wastewater to the Duck Island Wastewater Treatment Facility (WWTF), with the following conditions:

1. **Compliance with the City of Lowell's Sewer Use Ordinance:** All discharges from this facility must comply with the City of Lowell's Sewer Use Ordinance/Local Limits. A copy is enclosed for your reference.
2. **Daily Discharge Limit:** 70,000 Gallons Per Day (GPD).
3. **Proposed Discharge Fee:** \$0.035 per gallon. Payment terms should be arranged with the Executive Director.
4. **Provide access to Utility personnel for inspection and sampling:** The Permittee shall provide Utility personnel access to its facilities and hauling vehicles for the purposes of monitoring permitted discharges, determining pollutant sources, inspecting processes, and/or verifying IDA compliance.
5. **Wastewater sampling shall be performed to characterize the process discharges and establish compliance with local sewer discharge limits.** As part of the permit application process, Public Service of New Hampshire submitted projected sampling results. While this information is useful, it is imperative that new sampling data that characterizes actual discharges be compiled.

The Utility is requiring that Baseline Monitoring Analysis (BMA) be conducted on wastewater discharges from the FGD system to identify all priority pollutants contained in the process wastewaters within Two (2) Weeks of initial discharge.

A second round of BMA sampling shall be conducted once the facility has completed start-up procedures and is operating under normal conditions. Sampling results shall be submitted to the Utility no later than December 16, 2011. Please notify the Utility in writing should extenuating circumstances make it not possible to submit the BMA by this date.

The discharges shall be analyzed for the following priority pollutants: pH; BOD (Biochemical Oxygen Demand); COD (Chemical Oxygen Demand); TSS (Total Suspended Solids); Metals [Aluminum, Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium (Total), Copper, Fluoride, Lead, Mercury, Molybdenum, Nickel, Selenium, Silver, Thallium, and Zinc]; Cyanide (Total); Nitrogen (Total); Phenols (Total); Oil & Grease (O&G); Poly-Chlorinated Biphenyls (PCB's); Volatile Organic Compounds (VOC's); and Semi-Volatile Organic Compounds (SVOC's). PCB's, VOC's, and SVOC's shall be analyzed using EPA Methods 608, 624, and 625, respectively.

Please Note: PCB, VOC and SVOC analysis shall only be performed during the second round of BMA sampling.

*Based on the results of the BMA, subsequent sampling requirements will be specified in the new discharge permit. All samples shall be representative of the process discharges; samples will be collected and preserved according to Standard Method 1060 A-C. A state-certified laboratory shall analyze all wastewater samples. A Self-Monitoring Report (SMR) Summary Sheet is enclosed for submittal of the BMA sampling results. For your reference, an excerpt from *Standard Methods for the Examination of Water and Wastewater (20th Edition)* is enclosed. For a current list of state-certified labs, you may use the following link to the Massachusetts Department of Environmental Protection website: following link:
<http://public.dep.state.ma.us/labcert/labcert.aspx>.*

6. **An interim discharge period of Six (6) Months shall be used to demonstrate compliance with the local sewer discharge limits.** Wastewater characterization and compliance with the local limits will be used to consider the permit application for authorization to discharge industrial wastewater. In addition to BMA self-monitoring sampling results, the Utility may conduct its own sampling of discharges to the WWTF. Results from all sampling conducted during the interim discharge period will be used to confirm compliance with local limits and identify pollutants of concern. Specific sampling requirements will be included in a five-year industrial sewer user discharge permit that will be issued at the end of the interim discharge period.
7. **Permittee sampling shall be conducted on a Monthly basis beginning on the Second Month of discharge:** Reports are due on the last day of the month and shall be submitted to Pretreatment Coordinator, Amy Daigneault.
8. **The Utility is requiring that the discharges be analyzed according to the schedule in condition No. 7 for the following parameters:** pH, COD (Chemical Oxygen Demand), Arsenic, Cadmium, Lead, Mercury, and Silver.
9. **The Utility intends on conducting weekly monitoring at the WWTF. Monitoring will be conducted weekly for the first month and if data indicates compliance sampling will be reduced.**
10. **Permittee will be responsible for monitoring costs incurred by the Utility (i.e. analytical lab fees). Invoices will be issued on a monthly basis and will contain supporting documentation on cost.**

- 11. Maintain and operate the wastewater treatment system properly.** All equipment and unit processes shall be maintained and operated in a manner that ensures effective treatment. Keep a bound logbook or a comparable method of record keeping that contains descriptions of operational conditions and maintenance activities regarding the wastewater treatment system. Record discharge volumes and pH measurements in the logbook.
- 12. Report any new information to the Utility:** Should any new information become available regarding the characteristics of the discharge, report this to the Utility immediately.
- 13. The Utility reserves the right to require additional information, makes changes to this IDA as needed, or terminate this IDA.**

Please contact me at 978-970-4248 x1622 if you have any questions regarding this Interim Discharge Authorization.

Respectfully,



Amy Daigneault
Pretreatment Coordinator
Lowell Regional Wastewater Utility

Cc File
Mark Young, Executive Director, Lowell Regional Wastewater Utility
Michael Stuer, Engineering Manager, Lowell Regional Wastewater Utility
Tom Kawa, Operations Superintendent, Lowell Regional Wastewater Utility
Ron Breton, P.E., GZA GeoEnvironmental