



**{In Archive} RE: Max Day Limits**

**palmeag** to: John King

03/24/2010 12:38 PM

From: palmeag@nu.com  
To: John King/R1/USEPA/US@EPA  
Archive: This message is being viewed in an archive.

Ya, things are all changed around now. Maybe give him another week to work through his "anti-deg" results and then we can talk.

king.john@epamail.epa.gov

03/24/2010 10:48 AM

To Allan G. Palmer/NUS@NU  
cc  
Subject RE: Max Day Limits

Allan,

Do I need to call Jeff to discuss? The last time Jeff and I met there was no confusion concerning what flows were going to be applied to the permit.

Please advise, John  
-----palmeag@nu.com wrote: -----

To: "Andrews, Jeff" <Jeffrey.Andrews@des.nh.gov>  
From: palmeag@nu.com  
Date: 03/19/2010 08:32PM  
Cc: royrr@nu.com, ken.braunstein@wgint.com, auclaaa@nu.com, John King/R1/USEPA/US@EPA  
Subject: RE: Max Day Limits

Confidential Business Information  
For Discussion Purposes Only

Jeff, I've always considered the two flow columns to be our "daily maximum" and "average monthly" flows, and EPA has typically taken those numbers and inserted them directly into our permit as the two limits.

I will use 14.03 and 6.33 mgd on Form 2C and will list 13.00 and 5.30 on the supplement for projected conditions. Form 2C lists the maximum concentrations from the 6 samples with the corresponding mass loads, e.g., AI = 0.65 so mass = 76.1 lbs. For the future, AI = 0.6629, so mass = 71.9 lbs. Sound right?

The flow limits can remain the same for 003A and 003B. If I'm not

mistaken, the ELGs term fireside washwater "metal cleaning waste" and waterside washwater "chemical metal cleaning waste." We had a few meetings with John on this issue and he has crafted quite a bit of fact sheet language. Right now I don't have access to his draft but I should be able to email it to you later. If I recall our last meeting, we got pretty creative and actually discussed establishing a second sampling station in the canal. Let's see how your numbers shake out.

Thanks, Allan.

"Andrews, Jeff"  
<Jeffrey.Andrews@  
des.nh.gov> To  
Allan G. Palmer/NUS@NU  
cc  
03/19/2010 03:32  
PM Subject  
RE: Max Day Limits

Allan, I may be confusing you since I was thinking that form 2C had a monthly average flow and it doesn't.

I think for outfall 003A that your form 2C should reflect current conditions of 6.3 mgd for the max 30-day average flow and whatever maximum daily flow you have now (14 mgd?). The form 2C should also include the data from the six rounds of weir sampling such that it describes existing concentrations. The maximum concentrations can be the historical values or the max of the six weir samples.

The supplement to your application (my recent voicemail) can describe the anticipated changes in 003A flow (5.27 mgd for the max 30-day average) and provide the anticipated concentrations after the scrubber is on line which are based on what the new treatment system is designed to achieve.

As for maximum daily flow that exists now it should be 1.03 mgd larger than what it will be when the scrubber is on line (i.e.  $1.08 - .05 = 1.03$ ).

I need to know what the maximum daily flow is now and what it will be in the future for BOTH 003A and 003B. I'm assuming that 003B in the new permit will include air heater washes, boiler washes and chemical cleanings.

Before you file Form 2C we should try to have an handle on what the

maximum daily limits might be. That's what I'm working on now and I need max flows to do it.

Thanks, Jeff

Jeffrey G. Andrews, P.E.  
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NH Department of Environmental Services  
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E-mail: Jeff.Andrews@des.nh.gov

-----Original Message-----

From: palmeag@nu.com [mailto:palmeag@nu.com]  
Sent: Friday, March 19, 2010 2:41 PM  
To: Andrews, Jeff  
Subject: RE: Max Day Limits

Wait, I'm not using Ken's approach, I'm talking about the actual flow going over the weir. So we're requesting 13 mgd for the max daily flow and the 5.3 (that was decided upon during all the anti-deg review) is the monthly average. We believe these numbers are protective enough to cover worst case discharges during the monsoon season.

Did you listen to my voicemail about which concentrations to put on Form 2C; actual monitoring data we collected or our projected future concentrations?

"Andrews, Jeff"  
<Jeffrey.Andrews@des.nh.gov>  
To: Allan G. Palmer/NUS@NU  
cc: 03/19/2010 01:49 Richard R. Roy/NUS@NU  
PM  
Subject: RE: Max Day Limits

Okay, thanks. So the existing max 30 day average flow is around 14 mgd?

Also, would there a different max 30 day average flow for when there's short term discharges from air heater washes, boiler washes and chemical cleanings? If so, I'll need different number(s).

Jeff

Jeffrey G. Andrews, P.E.  
Sanitary Engineer  
Wastewater Engineering Bureau  
NH Department of Environmental Services  
Tel: (603) 271-2984  
Fax: (603) 271-4128  
E-mail: [Jeff.Andrews@des.nh.gov](mailto:Jeff.Andrews@des.nh.gov)

-----Original Message-----

From: [palmeag@nu.com](mailto:palmeag@nu.com) [mailto:[palmeag@nu.com](mailto:palmeag@nu.com)]  
Sent: Friday, March 19, 2010 1:26 PM  
To: Andrews, Jeff  
Cc: [royrr@nu.com](mailto:royrr@nu.com)  
Subject: Re: Max Day Limits

Jeff, The plan is to use 13.0 mgd and 5.3 mgd for max daily and average monthly, respectively.

"Andrews, Jeff"

<[Jeffrey.Andrews@](mailto:Jeffrey.Andrews@des.nh.gov)

[des.nh.gov](mailto:des.nh.gov)>

To

Richard R. Roy/[NUS@NU](mailto:NUS@NU), Allan G.

[Palmer/NUS@NU](mailto:Palmer/NUS@NU)

cc 03/19/2010 01:17

PM

Subject

Max Day Limits

Hi Rick & Allan, what maximum 30-day average Q do you plan to put in the new Form 2C based on historical flows. And, I assume this flow will drop by the same amount that we used for chronic conditions ... e.g. 1.08 - 0.05 = 1.03 mgd?

Thanks, Jeff

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