



**MARK A. YOUNG**  
EXECUTIVE DIRECTOR

# LOWELL REGIONAL WASTEWATER UTILITY

WASTEWATER COLLECTION AND TREATMENT



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LOWELL  
CHELMSFORD  
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TYNGSBORO

March 29, 2012

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

Mr. Palmer,

The Lowell Regional Wastewater Utility (the "Utility") has approved your request for an extension to the **Interim Discharge Authorization (IDA) that was issued to Public Service of New Hampshire on September 28, 2011**. The IDA authorizes the discharge of hauled wastewater to the Duck Island Wastewater Treatment Facility (WWTF). The IDA will be extended until October 5, 2012.

The Utility has reviewed the IDA and has made a few notable changes. The notable changes are summarized below in red:

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 was provided for your reference.*
2. **Daily Discharge Limit:** 70,000 Gallons Per Day (GPD).
3. **Proposed Discharge Fee:** \$0.035 per gallon for Stream A and *\$0.06 for Stream B*. 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 (20<sup>th</sup> 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.depstate.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.  
*Please Note the Permittee has an additional 30 days after the months end to submit Monthly Reports.*
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 monthly monitoring at the WWTF.**
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 978-674-1622 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