



**"Categorical" Wastestream**

palmeag to: John King

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From: palmeag@nu.com

To: John King/R1/USEPA/US@EPA

History: This message has been forwarded.

John, As we discussed this morning, PSNH is in negotiations with local municipalities about trucking treated effluent from the FGD to them for discharge. Manchester has focused on whether the treated blowdown is subject to EPA's "Categorical Standards," specifically the pretreatment standards of Parts 423.16 & 17. I pointed out that the pretreatment standards only regulated chemical metal cleaning wastes and cooling tower blowdown and clearly not FGD blowdown. I explained that EPA completed a study in 2009 of FGD blowdown and were in the process of creating ELGs for the wastestream, but they would not become final for quite some time yet.

DES even told Manchester that it is not a relevant issue but they still asked us to provide clarification from EPA as to whether the discharge is subject to categorical limits per 40 CFR Part 423. Can you please provide that clarification?

Thanks, Allan.

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