



{In Archive} Fw: Follow-up
palmeag to: John King

05/19/2009 09:45 PM

From: palmeag@nu.com
To: John King/R1/USEPA/US@EPA
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fyi

----- Forwarded by Allan G. Palmer/NUS on 05/19/2009 09:44 PM -----

Allan G.
Palmer/NUS
GEN DIRECTOR
720-2439
05/19/2009 09:43
PM

Jeff Andrews, "Spanos, Stergios"
<sspanos@des.state.nh.us>

To

cc

Subject

Follow-up

Is there any chance we can meet this Friday to discuss my mess further?
Some of the things I'd like to follow-up on:

The concept, and why the proposal is not being managed with the traditional approach of evaluating discharge concentrations with dilution ratios against water quality standards. My understanding is that because we are proposing a new discharge we are subject to the anti-degradation provisions and that the only way to avoid anti-deg is to offset our loadings such that pre-scrubber equals post-scrubber. I assume this essentially involves treating our existing wastestreams further. Other facilities where this approach has been enacted and review their applications and studies with a focus on metals. The impairments DES currently has for the river and other possible pollutants of concern. I believe the law was passed to build the scrubber to address acid rain and mercury in the waterways, so it seems we have a head start if those are pollutants of concern. Consultants and labs with experience working with DES in this field. Dropping our slag pond discharge flow limit by 50% +/-.

I understand you won't have all the details but I need to discuss this info further to begin pulling our plan together. Thanks, Allan.

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