



STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION

JOHN ELIAS BALDACCI  
GOVERNOR

DAVID P. LITTELL  
COMMISSIONER

November 3, 2006

Mr. John Robinson  
President  
Robinson Manufacturing Company  
P.O. Box 837  
Oxford, ME. 04270

RE: Maine Pollutant Discharge Elimination System (MEPDES) Permit #ME0002526  
Maine Waste Discharge License (WDL) Application #W000612-5N-H-M  
**Final Permit/License Modification**

Dear Mr. Robinson:

Enclosed please find a copy of your **final** MEPDES permit and Maine WDL permit **modification** which was approved by the Department of Environmental Protection. Please read the permit/license and its attached conditions carefully. You must follow the conditions in the order to satisfy the requirements of law. Any discharge not receiving adequate treatment is in violation of State Law and is subject to enforcement action.

Any interested person aggrieved by a Department determination made pursuant to applicable regulations, may appeal the decision following the procedures described in the attached DEP FACT SHEET entitled "*Appealing a Commissioner's Licensing Decision.*"

If you have any questions regarding this matter, please feel free to call me at 287-7693.

Sincerely,

Gregg Wood  
Division of Quality Management  
Bureau of Land and Water Quality

Enc.

cc: Fred Gallant, DEP/SMRO  
Sand Lao, USEPA

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826  
RAY BLDG., HOSPITAL ST.

BANGOR  
106 HOGAN ROAD  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769-2094  
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STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION  
STATE HOUSE STATION 17      AUGUSTA, MAINE 04333

DEPARTMENT ORDER

**IN THE MATTER OF**

ROBINSON MANUFACTURING COMPANY	)	MAINE POLLUTANT DISCHARGE
OXFORD, OXFORD COUNTY, MAINE	)	ELIMINATION SYSTEM PERMIT
TEXTILE MANUFACTURING		AND
ME0002526	)	WASTE DISCHARGE LICENSE
W000612-5N-H-M	)	<b>MODIFICATION</b>
		<b>APPROVAL</b>

Pursuant to the provisions of the Federal Water Pollution Control Act, Title 33 USC, Section 1251, et seq. and Maine Law, 38 M.R.S.A., Section 414-A et seq., and applicable regulations, the Department of Environmental Protection has considered the application of the ROBINSON MANUFACTURING COMPANY (RMC), with its supportive data, agency review comments, and other related materials on file and FINDS THE FOLLOWING FACTS:

**APPLICATION SUMMARY**

The applicant has applied for a modification of combination Waste Discharge License (WDL) #W000612-5N-G-R / Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0002526 issued by the Department on December 16, 2003 with an expiration dated of December 16, 2008. The permit approved a monthly average discharge of 0.50 million gallons per day (MGD) of treated process and sanitary waste water and a daily maximum of 0.20 MGD of cooling waters from a woolen mill to the Thompson Lake Outlet Stream (TLOS), Class C in Oxford, Maine.

**MODIFICATION REQUESTED**

The permittee has requested the Department grant authorization to treat up to 5,000 gallons per day (gpd) of septage received from local septage haulers.

**PERMIT SUMMARY**

This permit carries forward all terms and conditions of the December 16, 2003 permit and is;

- 1) Authorizing the permittee to treat up to 5,000 gallons per day of septage.
- 2) Establishing technology based seasonal monthly average (geometric mean) and daily maximum limitations for *E. coli* bacteria.
- 3) Establishing technology based monthly average and daily maximum limitations for total residual chlorine.

## CONCLUSIONS

BASED on the findings in the attached Fact Sheet dated September 12, 2006, and subject to the Conditions listed below, the Department makes the following CONCLUSIONS:

1. The discharge, either by itself or in combination with other discharges, will not lower the quality of any classified body of water below such classification.
2. The discharge, either by itself or in combination with other discharges, will not lower the quality of any unclassified body of water which the Department expects to adopt in accordance with the state law.
3. The provisions of the State's antidegradation policy, 38 M.R.S.A., Section 464(4)(F), will be met in that:
  - a. Existing in-stream water uses and the level of water quality necessary to protect and maintain those existing uses will be maintained and protected;
  - b. Where high quality water of the State constitute an outstanding national resource, that water quality will be maintained and protected;
  - c. The standards of classification of the receiving water body are met or, where the standards of classification of the receiving water body are not met, the discharge will not cause or contribute to the failure of the water body to meet the standards of classification;
  - d. Where the actual quality of any classified receiving water body exceeds the minimum standards of the next highest classification, that higher water quality will be maintained and protected; and
  - e. Where a discharge will result in lowering the existing quality of any water body, the Department has made the finding, following opportunity for public participation, that this action is necessary to achieve important economic or social benefits to the State.
4. The discharge will be subject to effluent limitations that require application of best practicable treatment.

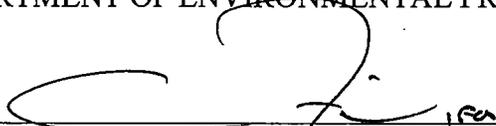
**ACTION**

THEREFORE, the Department APPROVES the above noted application of the ROBINSON MANUFACTURING COMPANY, to treat up to 5,000 gpd of septage in the waste water treatment facility at it's manufacturing facility in Oxford, Maine, SUBJECT TO THE ATTACHED CONDITIONS, and all applicable standards and regulations including:

1. "Maine Pollutant Discharge Elimination System Permit Standard Conditions Applicable To All Permits," revised July 1, 2002, copy attached.
2. The attached Special Conditions, including any effluent limitations and monitoring requirements.
3. All the terms and conditions of combination Waste Discharge License (WDL) #W000612-5N-G-R / Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0002526 issued by the Department on December 16, 2003 remain in effect and enforceable.
4. This permit modification expires on December 16, 2008, concurrent with WDL #W000612-5N-G-R/ MEPDES permit #ME0002526.

DONE AND DATED AT AUGUSTA, MAINE, THIS 6<sup>TH</sup> DAY OF NOVEMBER, 2006.

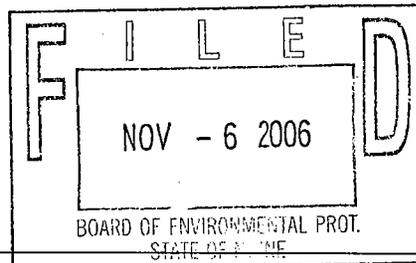
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:   
DAVID P. LITTELL, Commissioner

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: August 18, 2006

Date of application acceptance: August 25, 2006



Date filed with Board of Environmental Protection \_\_\_\_\_

This order prepared by Gregg Wood, BUREAU OF LAND AND WATER QUALITY

**SPECIAL CONDITIONS**

**A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

**Outfall 001 - Treated process and sanitary waste waters.**

*June 1<sup>st</sup> – September 30<sup>th</sup> of each year unless otherwise specified.*

Effluent Characteristic	Discharge Limitations						Minimum Monitoring Requirements	
	Monthly Average	Daily Maximum	Monthly Average	Weekly Average	Daily Maximum	Measurement Frequency	Sample Type	
Total Phosphorus [00665]	---	Report #/day [26]	---	---	Report mg/L [19]	1/Month [01/30]	Grab [GR]	
Temperature – Effluent [00011]	--	---	---	Report °F [15]	90 °F [15]	1/Day [01/01]	Grab [GR]	
Temperature – TLOS (1) [00011]	---	---	---	Report °F [15]	Report °F [15]	1/Day [01/01]	Grab [GR]	
Thermal Load [00017]	---	---	---	67.4EE6 BTU's/Day (2) [06]	67.4EE6 BTU's/Day (3) [06]	1/Day [01/01]	Calculate [CA]	
<i>E. coli</i> Bacteria (6) [31616] (May 15 – September 30)	---	---	142/100 ml (7) [13]	---	949/100 ml [13]	2/Week [02/07]	Grab [GR]	
Total Residual Chlorine (7) [50060]	---	---	0.1 mg/L [19]	---	0.3 mg/L [19]	1/Day [01/01]	Grab [GR]	

## SPECIAL CONDITIONS

### A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

#### Outfall 001 - Treated process and sanitary waste waters.

##### Footnotes:

1. **Temperature TLOS** - See combination WDL #W000612-5N-G-R / MEPDES permit #ME0002526 issued by the Department on December 16, 2003.
6. ***E. coli* bacteria** – Limits and monitoring requirements are seasonal (May 15 – September 30). The Department reserves the right to impose year-round disinfection to protect the health and welfare of the public.
7. ***E. coli* bacteria** – The monthly average limitation is a geometric mean limitation and shall be calculated and reported as such.
8. **Total Residual Chlorine** – Limitations and monitoring requirements are applicable whenever elemental chlorine or chlorine based compounds are being used to disinfect the discharge. TRC shall be tested using Amperometric Titration or the DPD Spectrophotometric Method. The EPA approved methods are found in Standard Methods for the Examination of Water and Waste Water, (most current approved edition), Method 4500-CL-E and Method 4500-CL-G or U.S.E.P.A. Manual of Methods of Analysis of Water and Wastes.

### J. DISPOSAL OF SEPTAGE WASTE IN WASTE WATER TREATMENT FACILITY

During the effective period of this permit, the permittee is authorized to add up to **5,000 gallons per day** of septage into its waste water treatment process, subject to the following terms and conditions.

1. This approval is limited to methods and plans described in the application and supporting documents. Any variations are subject to review and approval prior to implementation.
2. At no time shall addition of septage cause or contribute to effluent violations. If such conditions do exist, receipt of septage shall be suspended until effluent quality can be maintained.
3. The permittee shall maintain records which shall include, as a minimum, the following by date: volume of septage received, source of the septage (name of municipality), the hauler transporting the septage, the dates and volume of septage added to the waste treatment influent and test results.

**J. DISPOSAL OF SEPTAGE WASTE IN WASTE WATER TREATMENT FACILITY**

4. Addition of septage shall not cause the treatment facilities design capacity to be exceeded. If, for any reason, the treatment facility becomes overloaded, receipt of septage shall be reduced or terminated in order to eliminate the overload condition.
5. Septage known to be harmful to the treatment processes shall not be accepted. Wastes which contain heavy metals, toxic chemicals, extreme pH, flammable or corrosive materials in concentrations harmful to the treatment operation shall be refused.
6. Holding tank waste water shall not be recorded as septage and should be reported in the treatment facility's influent flow.

**K. SEVERABILITY**

In the event that any provision, or part thereof, of this permit modification is declared to be unlawful by a reviewing court, the remainder of the permit shall remain in full force and effect, and shall be construed and enforced in all aspects as if such unlawful provision, or part thereof, had been omitted, unless otherwise ordered by the court.

**MAINE POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT  
AND**

**MAINE WASTE DISCHARGE LICENSE**

**FACT SHEET**

Date: September 12, 2006

PERMIT NUMBER: **ME0002526**  
LICENSE NUMBER: **W000612-5N-H-M**

NAME AND ADDRESS OF APPLICANT:

**ROBINSON MANUFACTURING COMPANY  
Woolen Textile Finishing Manufacturing  
P.O. Box 195  
Oxford, Maine 04270**

COUNTY: **Oxford County**

NAME AND ADDRESS WHERE DISCHARGE OCCURS:

**283 King Street  
Oxford, Maine 04270**

RECEIVING WATER/CLASSIFICATION: **Thompson Lake Outlet Stream/Class C**

COGNIZANT OFFICIAL AND TELEPHONE NUMBER: **John Robinson, President  
(207) 539-4481**

**1. APPLICATION SUMMARY**

The applicant has applied for a modification of combination Waste Discharge License (WDL) #W000612-5N-G-R / Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0002526 issued by the Department on December 16, 2003 with an expiration dated of December 16, 2008. The permit approved a monthly average discharge of 0.50 million gallons per day (MGD) of treated process and sanitary waste water and a daily maximum of 0.20 MGD of cooling waters from a woolen mill to the Thompson Lake Outlet Stream (TLOS), Class C in Oxford, Maine. See Attachment A of this Fact Sheet for a location map.

**2. MODIFICATION REQUESTED**

The permittee has requested the Department grant authorization to treat up to 5,000 gallons per day (gpd) of septage received from local septage haulers.

### 3. PERMIT SUMMARY

- a. Terms and conditions – This permit carries forward all terms and conditions of the December 16, 2003 permit and is;
- 1) Authorizing the permittee to treat up to 5,000 gallons per day of septage.
  - 2) Establishing technology based seasonal monthly average (geometric mean) and daily maximum limitations for *E. coli* bacteria.
  - 3) Establishing technology based monthly average and daily maximum limitations for total residual chlorine.
- b. History: The most recent licensing/permitting actions include the following:

*December 10, 1998* – The Department issued WDL #W000612-5N-D-R.

*March 30, 1999* – The U.S. Environmental Protection Agency (EPA) issued National Pollutant Discharge Elimination System (NPDES) permit #ME0002526.

*September 23, 1999* – The Department issued modification WDL #W000612-5N-E-M for the increase in the mass and concentration limitations for total chromium.

*May 23, 2000* – The Department administratively modified WDL #W000612-5N-D-R by establishing interim average and maximum concentration limits of 12.9 ng/L and 19.4 ng/L respectively for mercury.

*January 12, 2001* - The Department received authorization from the EPA to administer the NPDES permit program in Maine. The program is referred to as the Maine Pollutant Discharge Elimination System (MEPDES) Program.

*December 18, 2001*- The Department issued combination MEPDES #ME0002526 and WDL #W000612-5N-F-M modification.

*December 16, 2003* – The Department issued MEPDES #ME0002526 and WDL #W000612-5N-G-R for a five-year term.

*August 18, 2006* – The RMC submitted an application to the Department to modify combination WDL #W000612-5N-G-R MEPDES #ME0002526 and requesting authorization to treat up to 5,000 gpd of septage from local septage haulers.

### 3. PERMIT SUMMARY (cont'd)

- c. Source Description: The RMC, located into the Town of Oxford, was a manufacturer of fine woolen fabrics from virgin wool and synthetic material blends. Due to economic conditions, the manufacturing facility was permanently shutdown in the spring of 2004. Since the shutdown, the waste water treatment facility continues to receive sanitary waste waters from the manufacturing facility, eight apartment buildings, a retail/office building, the Oxford Post Office and the Oxford Town Office. The RMC has plans to redevelop the manufacturing site into commercial and residential units. Ground breaking for the redevelopment project is scheduled for calendar year 2007. Until that time, in an effort to keep the waste water treatment facility operating with an influent source close to design and to generate revenue to cover operating costs, the RMC is seeking authorization to treat up to 5,000 gpd of septage received from local septage haulers.
- d. Waste Water Treatment: Waste waters discharged to the TLOS receive best practicable treatment via a secondary waste water treatment system consisting of a hydraulic equalization and pH neutralization tank, three aeration tanks and two secondary clarifiers operating in series. A cationic polymer can be added to the second secondary clarifier to enhance settling of solids before discharge. Sanitary flows are currently disinfected with sodium hypochlorite and dechlorinate with sodium bisulfite prior to discharge via Outfall #001.

It is noted Outfall #002 discharges non-contact cooling waters used to cool any plant equipment still in operation or periodically exercised. No formal treatment is applied to the discharge as the only pollutant of concern is heat.

The RMC submitted a Septage Management Plan as part of their 8/18/06 application for modification of the 12/16/03 permit. The plan indicates septage will delivered to the facility and off-loaded to a 30,000-gallon holding tank dedicated to septage. The septage will be aerated inside the tank, treated for odor and circulated through a grinder pump to obtain a better consistency of waste water prior to treatment. The septage will then be bled into a 75,000-gallon equalization tank prior to receiving biological treatment in the aeration tanks. See Attachment B of this Fact Sheet for a schematic of the waste water treatment facility.

Department rule Chapter 555, *Addition of Septage To Waste Water Treatment Facilities*, limits the quantity of septage treated at a facility to 1% of the design capacity of treatment facility. With a design capacity of 0.50 MGD, 5,000 gpd represents 1.0% of said capacity. The Department has reviewed and approved Septage Management Plan plan and determined that under normal operating conditions, the addition of 5,000 gpd of septage to the facility will not cause or contribute to upset conditions of the treatment process.

#### 4. CONDITIONS OF PERMITS

Maine Law, 38 M.R.S.A., Section 414-A, requires that the effluent limitations prescribed for discharges require application of best practicable treatment, be consistent with the U.S. Clean Water Act, and ensure that the receiving waters attain the State water quality standards as described in Maine's Surface Water Classification System. In addition, 38 M.R.S.A., Section 420, and Department Regulation Chapter 530.5, *Surface Water Toxics Control Program*, requires the regulation of toxic substances at the levels set forth for Federal Water Quality Criteria as published by the U.S. Environmental Protection Agency pursuant to the Clean Water Act.

#### 5. WATER QUALITY STANDARDS

Maine Law, 38 M.R.S.A., Section 467(1)(B)(2)(a) classifies the outlet of Thompson Lake in Oxford as a Class C waterway. Section 467(1)(B)(1)(b) classifies the Little Androscoggin River from its confluence with Thompson Lake Outlet Stream to its confluence with the Androscoggin River as a Class C waterway. Maine Law, 38 M.R.S.A., Section 465(4)(A-C) describes the classification standards for Class C waters.

#### 6. RECEIVING WATER QUALITY CONDITIONS

The 2004 Integrated Water Quality Monitoring and Assessment Report, published by the Department indicates the Thompson Lake Outlet Stream (TLOS) and the Little Androscoggin River in the vicinity and downstream of the discharge are attaining the standards of their assigned classification.

#### 7. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS

This permit renewal is carrying forward all of the limitations and monitoring requirements from the 12/16/03 permitting action with the exception of limitations for *E. coli* bacteria and total residual chlorine.

- a. *E. coli* bacteria – The previous permitting action is establishing seasonal (May 15 – September 30) monthly average and daily maximum limits of 142 colonies/100 ml and 949 colonies/100 ml respectively. The limitations require the application of BPT and are consistent with limitations established for other permitted facilities that discharge to Class C waterways.

**7. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS (cont'd)**

b. Dilution factors - The 12/6/03 established the following dilution factors;

With monthly average and daily maximum flow limitations of 0.50 MGD and 0.60 MGD respectively, the dilution factors are as follows:

$$\text{Dilution Ratio} = \frac{\text{River flow}}{\text{Plant flow}}$$

$$\text{Acute: } 1\text{Q}10 = 25 \text{ cfs} \Rightarrow \frac{(25 \text{ cfs}) (0.6464)}{0.60 \text{ MGD}} = 27.9:1$$

$$\text{Chronic: } 7\text{Q}10 = 25 \text{ cfs} \Rightarrow \frac{(25 \text{ cfs}) (0.6464)}{0.50 \text{ MGD}} = 33.3:1$$

$$\text{Harmonic Mean: } 25 \text{ cfs} \Rightarrow \frac{(25 \text{ cfs}) (0.6464)}{0.50 \text{ MGD}} = 33.3:1$$

Being that the redevelopment of the industrial site is still in the conceptual stage, the dilution factors cited above are being carried forward in the permit modification and are critical in establishing limitations for total residual chlorine.

c. Total Residual Chlorine - Limits on total residual chlorine (TRC) are specified to ensure that ambient water quality standards are maintained and that BPT technology is being applied to the discharge. Based on dilution factors cited above, water quality based end-of-pipe thresholds can be calculated as follows:

Parameter	Acute Criteria	Chronic Criteria	Acute Dilution	Chronic Dilution	Acute Limit	Chronic Limit
Chlorine	19 ug/L	11 ug/L	27.9:1	33.3:1	0.53 mg/L	0.37 mg/L

Example calculation: Acute – 0.019 mg/L (27.9) = 0.093 mg/L

To meet the chronic and acute water quality based thresholds calculated above, the permittee must dechlorinate the effluent prior to discharge. In April of 1999, the Department established new daily maximum and monthly average BPT limitations of 0.3 mg/L and 0.1 mg/L respectively, for facilities that need to dechlorinate their effluent unless calculated water quality based thresholds are lower than the BPT limits. In the case of the RMC facility, the calculated acute and chronic water quality based thresholds are higher than the BPT limits of 0.3 mg/L and 0.1 mg/L. Thus, the daily maximum and monthly average BPT limits of 0.3 mg/L and 0.1 mg/L respectively, are being imposed in this permit modification.

**7. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS (cont'd)**

Once the re-development project comes to fruition, the Department and permittee will be in a better position to determine what the appropriate limitations and monitoring requirements are to be incorporated into the 2008 permit renewal.

**8. IMPACT ON THE RECEIVING WATERS**

The Department has made the determination that as permitted, existing and designated uses of TLOS and the Little Androscoggin River will be maintained and protected and the discharge is receiving best practicable treatment.

**9. PUBLIC COMMENTS**

Public notice of this application was made in the Lewiston Daily Sun newspaper on or about August 17, 2006. The Department receives public comments on that application until the date a final agency action is taken on that application. Those persons receiving copies of draft permits shall have at least 30 days in which to submit comments on the draft or to request a public hearing, pursuant to Chapter 522 of the Department's rules.

**10. DEPARTMENT CONTACTS**

Additional information concerning this permitting may be obtained from and written comments should be sent to:

Gregg Wood  
Division of Water Quality Management  
Bureau of Land and Water Quality  
Department of Environmental Protection  
17 State House Station  
Augusta, Maine 04333-0017

Telephone (207) 287-3901

**11. RESPONSE TO COMMENTS**

During the period September 12, 2006 through issuance of this permit, the Department solicited comments from state and federal agencies as well as parties that expressed interest in the proposed draft permit modification for the discharge from the RMC waste water treatment facility. The Department received written comments from the permittee via electronic mail on October 3, 2006. Response to comments are as follows:

## 11. RESPONSE TO COMMENTS

Comment #1 – The permittee requested they be “... *allowed to receive up to 5,000 gallons per day on a weekly basis as long as no more than 5,000 gallons per day of septage is introduced to the waste water treatment process.*”

Response #1 – Special Condition J of the permit already authorizes the facility to treat up to 5,000 gallons per day and does not limit the quantity of septage that may be received at the facility in any given time period. No modification of the permit language is necessary.

Comment #2 – The permittee requested seasonal (May 15 – September 30) *E. coli* bacteria limitations of 142 colonies/100 ml as a monthly average (geometric mean) and 949 colonies/100 ml as a daily maximum to be consistent with limitations established for other permitted facilities that discharge to Class C waterways. The limits were requested as the Department erred in not understanding that the disinfection process to be implemented is at the end of the treatment process whereas in the 12/6/03 permitting action when industrial process waste waters were being treated, the disinfection process for sanitary waste waters was conducted prior to co-mingling with industrial process waste water.

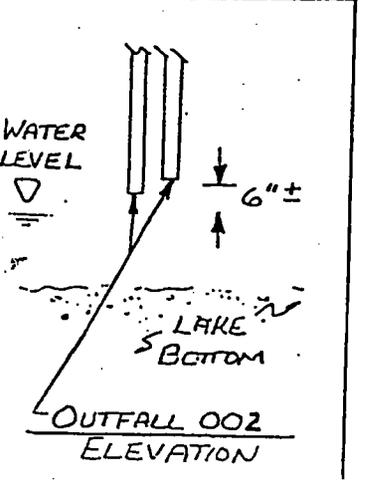
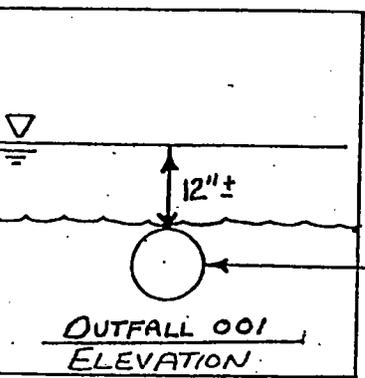
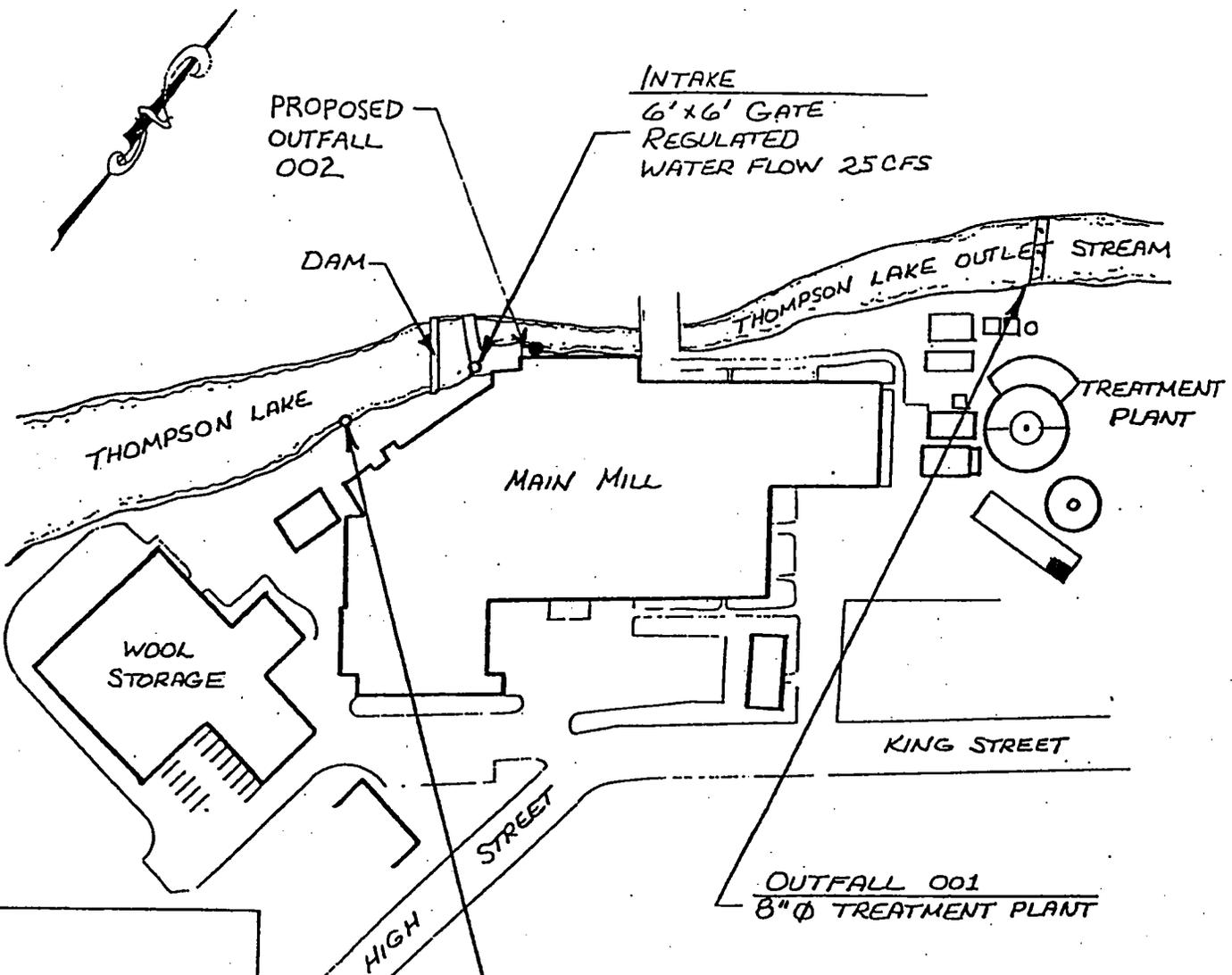
Response #2 – The Department concurs that based on the disinfection process being the last step in the treatment process, *E. coli* bacteria limits for the discharge are appropriate. The permit modification has been revised accordingly.

Comment #3 – The permittee requested a seasonal (May 15 – September 30) total residual chlorine (TRC) limit of 0.14 mg/L.

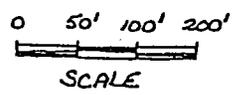
Response #3 – The permit has been modified to incorporate technology based monthly average and daily maximum TRC limits. See Section 7(c) of this Fact Sheet for the derivation of the limits.

# **ATTACHMENT A**





EXISTING OUTFALL 002  
2 - 2"φ COOLING  
WATER DISCHARGE  
PIPES.



DEP EXHIBIT 7  
EPA FORM 1 - XI



ROBINSON MANUFACTURING  
OXFORD, MAINE:

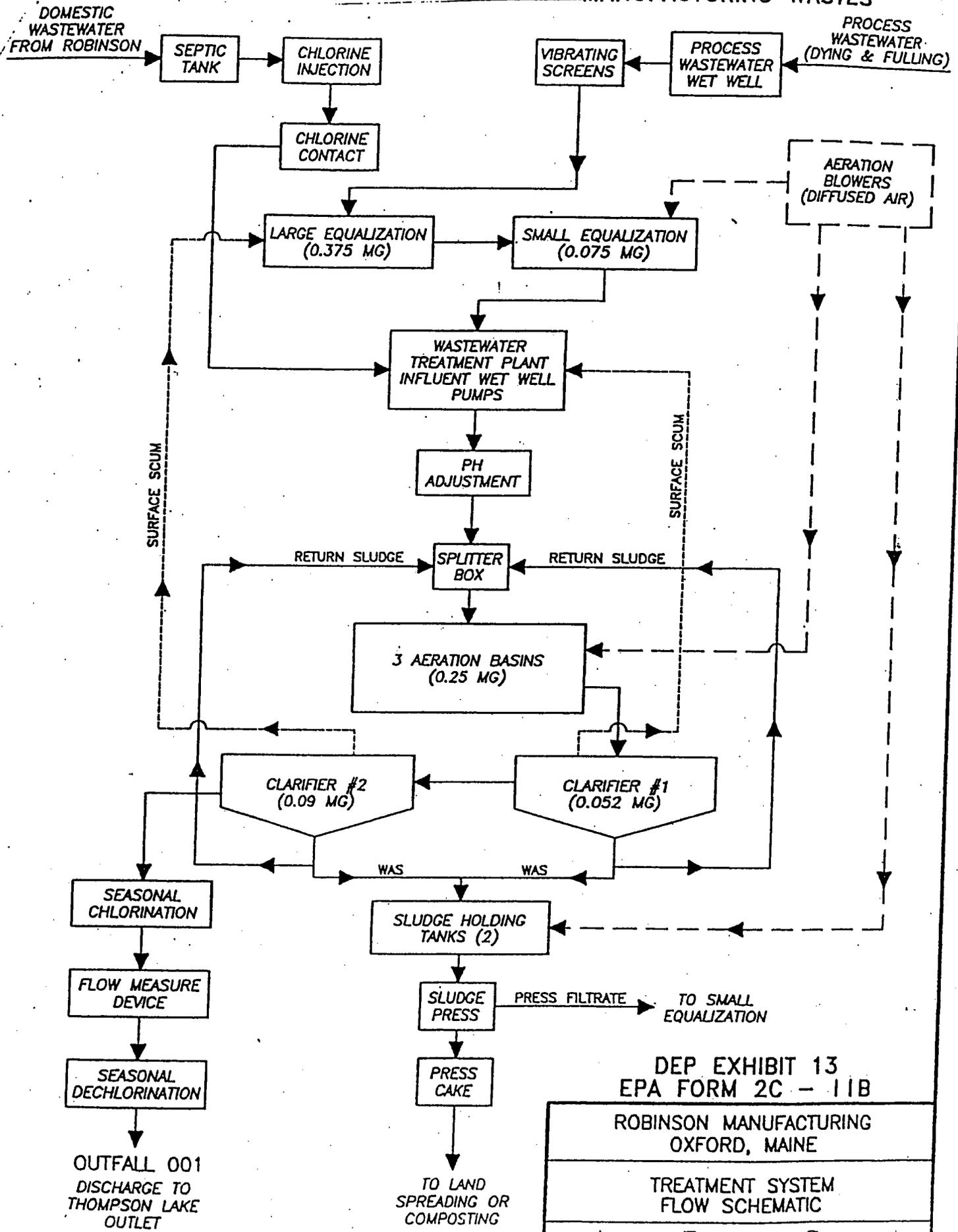
OUTFALL INFORMATION

ACHERON ENGINEERING SERVICES  
40 Main Street  
Newport, Maine 04853

**ATTACHMENT B**

**SANITARY WASTES**

**MANUFACTURING WASTES**



DEP EXHIBIT 13  
EPA FORM 2C - 11B

ROBINSON MANUFACTURING  
OXFORD, MAINE

TREATMENT SYSTEM  
FLOW SCHEMATIC

**ACHERON ENGINEERING SERVICES**  
Engineering, Environmental & Geologic Consultants  
Newport, Maine • Falmouth, Maine