Message

From: Rastorguyeff, Alexis [Alexis.Rastorguyeff@des.nh.gov]
Sent: 4/11/2018 7:18:59 PM
To: 'Terry L. Desmarais' [tldesmarais@cityofportsmouth.com]
CC: Tracy.Wood@des.nh.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=eda7d129db7f430eb9e239619b0dd589-Tracy.Wood@]; stergios.spanos@des.nh.gov [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=bc76eb84e66943c1961b16d9abf7575f-stergios.spanos@des.nh.gov]; Steve Clifton (sclifton@underwoodengineers.com) [sclifton@underwoodengineers.com]; Patrick E. Wiley [pewiley@cityofportsmouth.com]
Subject: RE: IDR 17-016 / Lonza Biologics / Pease WWTP Headworks Loading Allocation

Terry,

Yes, NHDES is amenable to the requested four month extension to the due date specified in Special Condition No. 1 of IDR 17-016.

Regarding what is meant by "nominal production"; since the sampling has to reflect a representative wastewater discharge, and any production process has the ability to produce product at variable quantities (whether by changes in rate of production or in length of a production run), the intent is to have the sampling done over a time period where Lonza is operating in a normal fashion. Given the specialty of Lonza's production processes, it really is up to them to determine and validate when they are in "nominal" operation. If you want some kind of metric, I would say that "nominal production" is when Lonza is operating like it will be 80% of the time. This doesn't mean that any particular wastewater characteristic has to be 80% of a design value, but that the mode of overall facility operation is like it is 80% of the time. Hope this provides the clarification you requested.

Regards,

Alexis Rastorguyeff, PE, SE III
NHDES, Industrial Pretreatment Supervisor
29 Hazen Drive, PO Box 95
Concord, NH 03302-0095
phone: 603-271-2052
fax: 603-271-4128

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From: Terry L. Desmarais [mailto:tldesmarais@cityofportsmouth.com]
Sent: Friday, April 06, 2018 1:11 PM
To: Rastorguyeff, Alexis
Cc: Wood, Tracy; Spanos, Stergios; Steve Clifton (sclifton@underwoodengineers.com); Patrick E. Wiley
Subject: RE: IDR 17-016 / Lonza Biologics / Pease WWTP Headworks Loading Allocation

Alexis,

Thank you for reaching out to us for an update. We have been working diligently on the requirements of the DES conditional approval for Lonza's revised permit.

I've attached a number of items related to our efforts including the following: 1. Executed amendment with Underwood Engineers outlining the proposed work to address DES's special conditions; 2. Proposed two week intensive sampling plan for Pease WWTF, Lonza and Redhook; and 3. Existing and proposed loads at the WWTF.

We have delayed the sampling program based on Lonza's production schedule. We plan to perform the sampling program the first week of May. Underwood cannot perform the evaluation until all the laboratory work is complete and received. As a result, I would like to request a four month extension for completion of work. The IDR was conditionally approved on Nov 17, 2017. Special Condition No. 1 required work to be completed within 6 months or May 16, 2018. If our request is approved we would be delivering a completed report to DES on/before September 16, 2018. I believe there is no consequence of this delay because the facility is currently not near the design capacity loads at this time. Redhook and Lonza are both discharging only a fraction of allocated load. I've attached a schematic to demonstrate loads and we can provide additional information if necessary.

We would also appreciate some additional clarification on Special Condition No. 2. Can you define your meaning of "...nominal production..."? We are hopeful this effort will cover the intended need but wanted to clarify in advance.

Thank you,

Terry

Terry Desmarais, Jr., P.E.
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From: Rastorguyeff, Alexis [Alexis.Rastorguyeff@des.nh.gov]
Sent: Wednesday, March 28, 2018 8:36 AM
To: Terry L. Desmarais
Cc: Wood, Tracy; Spanos, Stergios
Subject: RE: IDR 17-016 / Lonza Biologics / Pease WWTP Headworks Loading Allocation

Terry,

A response please.

Regards,

Alexis Rastorguyeff, PE, SE III
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From: Rastorguyeff, Alexis
Sent: Wednesday, March 21, 2018 8:44 AM
To: 'Terry L. Desmarais'
Cc: Wood, Tracy; Spanos, Stergios
Subject: IDR 17-016 / Lonza Biologics / Pease WWTP Headworks Loading Allocation

Hello Terry,

As you know, there is less than two months until the 5/16/18 due date for the submittal of the 90% headworks loading allocation plan and schedule by the City of Portsmouth. Please provide a status of the plan development.

Regards,

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