Message

From: Moraff, Kenneth [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B6170EF3BAEF40C3BDECAB56FD74B07A-MORAFF, KENNETH]
Sent: 3/27/2019 4:29:57 PM
To: O'Donovan, Thomas [Thomas.O'Donovan@des.nh.gov]
Subject: RE: NPDES permit timing from EPA

Much appreciated – and always happy to get on the phone if there's an issue we need to work through.

Ken

From: O'Donovan, Thomas <Thomas.O'Donovan@des.nh.gov>
Sent: Wednesday, March 27, 2019 11:49 AM
To: Moraff, Kenneth <Moraff.Ken@epa.gov>
Subject: RE: NPDES permit timing from EPA

Ken, thanks much, we will do our very best to support your schedule. T

From: Moraff, Kenneth [mailto:Moraff.Ken@epa.gov]
Sent: Wednesday, March 27, 2019 9:26 AM
To: O'Donovan, Thomas <Thomas.O'Donovan@des.nh.gov>
Subject: RE: permit timing

Tom –

Below is our best estimate for when we expect to send NPDES permits to DES for review. As you'll see, these are approximate time frames and not exact dates. As we continue our work to streamline the NPDES process, we hope to be in a position to better predict permit development and be more precise about scheduling—we know that would help DES plan its own work. For now, though, these are our best estimates. Happy to discuss.

Ken

<u>Municipal permits</u>

Hillsborough – DES already reviewed; will issue draft soon
Great Bay nitrogen general permit – draft to DES next week
Newport – draft to DES in about a month
Keene – draft to DES in about a month
Milford – draft to DES later this year
Waterwater Treatment Facility general permit (formerly Small POTW general permit) – draft to DES by Sept. '19
Lincoln – draft to DES by Sept. '19
Ashland – draft to DES by Sept. '19
Waterville – draft to DES by Sept. '19

We no longer expect to send Henniker, Hampton, Lancaster, and Charlestown to DES this fiscal year.

Industrial permits

U.S. Army Cold Regions Lab – DES already reviewed
Nylon Corp. of America – draft to DES within a couple of weeks
Tyco Integrated Cable – draft to DES within a couple of weeks
Pine Tree Power – draft to DES likely this spring
Powder Mill Fish Hatchery – draft to DES late spring/early summer
GSP Merrimack – full draft to DES this summer, but because it's a large, complicated permit, will send pieces for review before that
Non-Contact Cooling Water General Permit – draft to DES by Sept. '19
Bridgewater Power Company – to be determined

From: O'Donovan, Thomas <Thomas.O'Donovan@des.nh.gov>
Sent: Tuesday, March 26, 2019 7:15 AM
To: Moraff, Kenneth <Moraff.Ken@epa.gov>
Subject: RE: permit timing

Thanks Ken. Without a schedule from your team, it will be very difficult for us to do our required activities within the timeframes, which will then impact your schedule. One of those feedback type things. T

From: Moraff, Kenneth [mailto:Moraff.Ken@epa.gov]
Sent: Monday, March 25, 2019 1:46 PM
To: O'Donovan, Thomas <Thomas.O'Donovan@des.nh.gov>
Subject: RE: permit timing

OK, we'll see what we can put together. It's hard to pin down permit development to a precise schedule, but we'll try to give the best sense we can of timing and sequencing.

Ken

From: O'Donovan, Thomas <Thomas.O'Donovan@des.nh.gov>
Sent: Monday, March 25, 2019 7:36 AM
To: Moraff, Kenneth <Moraff.Ken@epa.gov>
Cc: Pelletier, Rene <Rene.Pelletier@des.nh.gov>; Tracy.Wood@des.nh.gov
Subject: RE: permit timing

Ken, good info on the permit timing. After talking with the team, would it be possible to get a complete schedule or layout of timing for all 19 New Hampshire permits that EPA has said they want to complete this year? That would help us to synchronize resources to the schedule. T

From: Moraff, Kenneth [mailto:Moraff.Ken@epa.gov]
Sent: Friday, March 22, 2019 4:48 PM
To: O'Donovan, Thomas <Thomas.O'Donovan@des.nh.gov>
Subject: permit timing

Hi Tom –

Nice to talk with you today, and I look forward to seeing you soon, either in Boston or NH.

The next two permits we're working on (where this issue is relevant) are Keene and Newport. We hope to send drafts to DES for review in about a month. We also have Massachusetts permits that raise the same issue and are closer to issuance. In the response to comments on those permits, we need to refer to the overall plan to address upstream nitrogen loadings, so we'd definitely like to close the loop with DES before the MA permits come out. Ideally, our teams would meet within the next couple of weeks to pin down an approach. Does that make sense?

Hope this is helpful. Feel free to call me any time at 617-918-1502.

Ken