Message

**From**: Palmer, Allan [Allan.Palmer@graniteshorepower.com]
**Sent**: 3/1/2019 7:32:37 PM
**To**: Gray, Davidj [gray.davidj@epa.gov]
**CC**: Murphy, Thelma (Hamilton) [murphy.thelma@epa.gov]
**Subject**: RE: Schiller Station NHR05J008

Geez, I think we're there David. It may be like making sausage, but this is a far superior permit to the IP, all because we communicated. What's next, you make changes in NetDMR for Q2?

Thanks so much for the cooperation, Allan.

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Friday, March 01, 2019 11:55 AM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Subject:** RE: Schiller Station NHR05J008

Hi Allan,

Based on my responses below, I have now removed Outfalls 001, 002 and 012 from the table having confirmed that no additional monitoring will be required at these outfalls beyond what the MSGP already requires. So you will still have Outfalls 001 – 015 in your MSGP, but with identified SIOs, you will monitor only at 001, 004, 008, 011, 012, and 015 as amended to include the additional PAH, TN, and pH monitoring required at Outfall 008 and 011.

djg

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Thursday, February 28, 2019 2:03 PM
**To:** Gray, Davidj <gray.davidj@epa.gov>
**Subject:** RE: Schiller Station NHR05J008

Making progress with every turn!

Outfall 001
Excellent, we've divorced from IP 001 [POC: MSGP 001 represents road/parking lot drains – no roof drains]. So in that regard, 001 is a SIO to 002 and 003. Recognizing that you prefer sampling be performed at 002 due to industrial activities/exposed materials, I request we delete sampling at 002 and rely on 001. [OK, you can continue to monitor 001 and identify 002 (and 003) as SIOs as currently established in your MSGP NOI. Now that we have resolved, I'll remove the housekeeping inclusion of 001 and 002 from this amendment table as we have confirmed that only typical benchmark monitoring will apply to these outfalls.]

Outfall 012
Excellent, 012 is much superior to IP 006 for collecting roof drain samples [POC: IP 006 is represented in the MSGP as Outfall 014, and is a SIO to 012]. With regard to nitrogen monitoring, the IP Fact Sheet correctly stated that the application for 006 did report 0.9 mg/l of ammonia, but that was strictly for a boiler blowdown sample that did not contain any stormwater. As such, I don't believe there is any value to be gained in monitoring roof drains for nitrogen. The MSGP will still require nitrogen monitoring of the two outfalls that discharge runoff from the two large land drainage areas and the IP requires nitrogen monitoring of the two outfalls that represent all wastewater discharges. I argue that provides adequate coverage of nitrogen monitoring. [My apologies, I understood the sample to be representative of combined equipment discharges and stormwater. Where the ammonia-nitrogen is tied to only the blowdown, I agree monitoring would not be required for the roof drainage.]

Outfall 002
As stated above, 002 is nothing more than a mini-001 (with a little less exposure), so we request it be considered a SIO and that sampling be required at 001 only.

Outfalls 008/011
OK. I just want to point out that:

1. For PAHs, footnote 5 says we can request discontinuation but that the NDs must occur "over the first year ... of the permit cycle." I think it should say if NDs are reported "over 4 consecutive quarters." [good catch – so amended]
2. For pH, can you guarantee that if our discharge is measured at 6.4 SU and the rainfall is measured at 6.0 SU, that EPA's compliance web sites (ECHO, et al.) will not record the event as a permit violation? That is our experience with IPs and it is rather frustrating, especially when the false violations never go away. [I am working with our ICIS staff now to code the limit sets to accommodate the background condition to negate the generation of erroneous violations]

How's that? This may be tedious, but we are building a much better permit. Thanks David, Allan.

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Wednesday, February 27, 2019 3:08 PM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Subject:** Re: Schiller Station NHR05J008

Hi Allan - See my comments annotated below in red and revised monitoring requirements attached.

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David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Tuesday, February 26, 2019 2:48 PM
**To:** Gray, Davidj
**Subject:** RE: Schiller Station NHR05J008

I think we're getting close. Here's what I'm seeing with your summary:

**Outfall 001 (Outfall 013)**
Please note that this 001 designation refers to our IP application and should be replaced with the designation assigned by our MSGP NOI, i.e., Outfall 013. This discharge consists of mostly non-contact cooling water which is why we have consistently recommended against sampling it under the MSGP. I guess you feel sampling is necessary based upon comments from your IP section? There are some roof drains and a yard drain that discharge from this weir, but it makes much more sense to us to sample other similar discharges that are not complicated by mixing with process water, e.g., outfalls 001, 002, 003, 012. If you insist on keeping Outfall 013, we will likely need to install an internal sampling station on a downspout to ensure that we are sampling
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only stormwater, like we recently installed at Outfall 012. [I forgot to delete the endnote that was referencing IP 001. Intent was to include MSGP 001 that you had identified as a "yard & roof drain" in your earlier email.]

**Outfall 012**

Provides a good roof drain sample (including substantially identical to Outfall 013). Why are we sampling roof drains for nitrogen? [I included 012 instead of IP 006 to avoid its influence from process water and poor access (submerged) in favor of a collecting a solely stormwater sample from a convenient indoor monitoring point. As described in the IP Fact Sheet, the draft permit included nitrogen monitoring for 006 and other outfalls due to the stormwater nitrogen load documented in Schiller's 2010 reapplication.]

**Outfall 002**

We would prefer to use Outfall 001 due to ease of sampling, but I know you're more interested in 002 due to the chemical storage tanks (are you expecting us to have a spill while sampling?). [Outfall 001 cannot be a SIO for Outfall 002 on the face of it due to the industrial activities that occur and the exposed materials present.]

**Outfalls 008 (Schiller)/011 (Newington)**

You decided that these outfalls were not equivalent and so we will now sample both. I assume that we can request discontinuation of PAH sampling *at any time* that we have four consecutive non-detects? [Correct] Or, why not just make it happen automatically? [Under the MSGP model, the Operator submits a Change NOI to modify its monitoring requirements; NetDMR does not have functionality to automatically discontinue based on data received.] Please delete pH, we have been reporting pH data every single month for over 25 years and I can't ever recall dropping below 6.5 SU (can you check that on ICIS or ECHO or some such site?). I will also tell you that if we ever do report both the pH of the discharge and rainfall to be below 6.5 SU, EPA's tracking system will record it as a violation that will never go away (based upon experience elsewhere). I would argue that anti-backsliding does not apply since we now have 25 years of data that was not available when the permit was last written [Those data were taken into account, considering anti-backsliding, when reducing the pH monitoring from monthly to quarterly in the Draft IP based on Schiller's request. Upon further consideration, I have reduced the monitoring frequency to annually as it must remain sufficient to characterize effluent quality and detect events of noncompliance.] and we are now talking about an MSGP and not the original Individual Permit. Two very different things. [Actually, facilities are not eligible under the MSGP where they currently have an IP with effluent limits unless EPA allows it and incorporates the limits accordingly.]

**Timing**

Our contractor has made plans to sample the MSGP outfalls per the current arrangement (using outfalls A001 thru E001). We would much prefer to shift the entire transition off until Q2. [That would be fine.]

So just a couple more tweaks and we'll both be happy, eh? Thanks for the opportunity to comment David, I hope we talk again, Allan.

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Friday, February 22, 2019 4:04 PM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Subject:** Re: Schiller Station NHR05J008

Hi Allan,

Attached are the revised MSGP monitoring requirements. Based on historical compliance, monthly pH monitoring was reduced to quarterly based on Schiller's earlier request and in accordance with the anti-backsliding exceptions. Annual nitrogen monitoring corresponds with the MSGP impaired waters

monitoring. PAH monitoring can be eliminated upon request after 1-year (4 quarterly samples) is non-detect. Maintained outfalls from both tank farms (i.e., 008 and 011) as it is not certain that 011 is substantially identical to 008. Let's discuss next week.

Regards,

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David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Tuesday, February 12, 2019 12:21 PM
**To:** Gray, Davidj; Murphy, Thelma (Hamilton)
**Subject:** RE: Schiller Station NHR05J008

I think you hit the nail David. We asked to move the parking lot drain (023) into the MSGP and the IP team misunderstood that to mean we wanted all stormwater moved. Unfortunately we didn't see the end result until it was final mess.

Please keep me in the loop as you piece it all together. I definitely want the existing dioxin & PCB monitoring removed from NetDMR, as well as many of the pH & TSS requirements.

Thanks, Allan.

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Monday, February 11, 2019 2:54 PM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>; Murphy, Thelma (Hamilton) <murphy.thelma@epa.gov>
**Subject:** RE: Schiller Station NHR05J008

Hi Allan,

In brief, PSNH/Schiller requested that EPA remove the stormwater requirements from its draft IP in favor of EPA including them in a future MSGP authorization. Though stormwater discharges are typically eligible to be covered under either permitting mechanism, in this instance PSNH/Schiller chose the MSGP and therefore the draft IP was revised to remove authorizations for the industrial stormwater portion of any discharges from the facility. This means the stormwater monitoring requirements originally drafted in the IP must now be incorporated into the MSGP authorization. It's the discharges and not the outfalls that are authorized, and therefore there may be some duplication of outfalls between the two permits. So the task entails, regardless
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of any outfall re-numbering, ensuring that the required pH, PAH, and TN monitoring is adequately reflected in the MSGP through collection of samples from the original draft IP outfalls or those that are substantially identical. Note: stormwater monitoring requirements in the draft IP we based in part on nitrogen concentrations reported in stormwater from specific outfalls in the 2010 permit reapplication.

djg

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Monday, February 11, 2019 12:02 PM
**To:** Gray, Davidj <gray.davidj@epa.gov>; Murphy, Thelma (Hamilton) <murphy.thelma@epa.gov>
**Subject:** RE: Schiller Station NHR05J008

Thanks David. This sounds like a hornet's nest. I don't understand why the MSGP program would be assigning requirements to outfalls covered by the IP? These outfalls contain process water so they aren't even part of our NOI/SWPPP or listed in NetDMR. Are you suggesting that we need to retool our entire stormwater permitting, already consisting of 15 outfalls, to also incorporate a number of additional outfalls that are already regulated in the IP? That doesn't seem to make sense, we're going to be required to have the same outfalls in both permits? Shouldn't the IP Section have included all of the necessary monitoring in the permit for these outfalls? I must tell you that it my strong preference to keep the outfalls separated as either IP or MSGP, which I think is the intent of the NPDES program and implementing rules.

With regard to coalpile overflow, it was previously regulated as 013 in our IP; which is how we suggested it continue. EPA chose to move it over to MSGP, so we added it as Outfall 015 in our SWPPP/NOI.

Let me know you make out, and feel free to reach out if you have questions. Thanks again, Allan.

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Friday, February 08, 2019 4:55 PM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>; Murphy, Thelma (Hamilton) <murphy.thelma@epa.gov>
**Subject:** Re: Schiller Station NHR05J008

Hi Allan - Thanks for the outfall descriptions and site plan. My outfall numbering is based off the Draft Individual Permit (IP) to reflect the stormwater-only portions of the discharges that are not authorized under the now Final IP (n.b., emergency overflow from the coal pile runoff basin is identified as Outfall 013 in my attachment). Discharges important to get correct are Draft IP Outfalls 011 and 018 due to the need to add PAH, TN and pH monitoring under the MSGP as originally required in, and removed from, the IP. For 011, the Draft IP required monitoring the combined flow from all three pipes (i.e., MSGP Outfalls 008, 009, and 010), but we may be able consider including only 008 as you note, with the others designated as substantially identical outfalls (SIO). This could also hold true for Draft IP Outfall 018 where it is shown to be substantially identical to 008 as you indicate. We'll also want to look closer at Draft IP Outfall 023 (MSGP Outfall 001) with respect to pH monitoring to confirm that it is substantially identical to MSGP Outfall 002 as it has two chemical loading zones in its catchment area. Let me examine further and get back with you next week to discuss.

Regards,

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David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Friday, February 8, 2019 12:11 PM
**To:** Gray, Davidj; Murphy, Thelma (Hamilton)
**Subject:** RE: Schiller Station NHR05J008

Always forget the attachment!

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**From:** Palmer, Allan
**Sent:** Friday, February 08, 2019 12:08 PM
**To:** Gray, Davidj <gray.davidj@epa.gov>; Murphy, Thelma (Hamilton) <murphy.thelma@epa.gov>
**Cc:** Walker, Tom <twalker@cecinc.com>; Cochrane, Alison <acochrane@cecinc.com>
**Subject:** RE: Schiller Station NHR05J008

Welcome back David. Here is a listing of outfalls that have been and are currently being monitored under our MSGPs:

| Terminated Permit NHR053359 | Current Permit NHR05J008 |
|---|---|
| A001: Road/Parking Lot Drains | 001: Road/Parking Lot Drains |
| B001: On-site Yard Drains | 004: On-site Yard Drains |
| C001: Wood Yard Area Drains | 008: Tank Farm Drains (Schiller) |
| D001: Substation Area Drain | 012: Roof Drains (Unit 5 Boiler) |
| E001: Electrical Yard Drain | 015: Coalpile Basin Overflow |

There is not a direct correlation between the two lists, mostly because EPA upset the balance with changes made in the IP, and partly due to changes at the site and determinations made when revising the SWPPP. There is some crossover with a couple of the outfalls (A001/001 & B001/004), although not necessarily exact.

How do these outfalls match up with those on your list are from our IP application or EPA's final permit?
001: Contains process water, roof drains and a yard drain. For the MSGP, we felt it more appropriate to monitor yard & roof drains via outfalls that were purely stormwater, i.e., 001, 004 and 012 SWPPP outfalls.
006: Contains process water and roof drains. For the MSGP, we felt it more appropriate to monitor roof drains via an outfall that was purely stormwater, i.e., 012 SWPPP outfall.
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023: Parking lot drains. In the SWPPP, this is outfall 002, which is substantially identical to outfalls 001 and 003. For sampling convenience, outfall 001 is currently being monitored.
011: Schiller Tank Heater Drains. In the IP application, we designated Outfall 011 to be a combination of heater drains and yard drains. In the IP, EPA changed the outfall to consist of the discharge of heater drains only. The yard drains are now monitored under the MSGP as outfalls 008, 009 and 010 (substantially identical).
018: Newington Tank Heater Drains. Again, in the IP application we designated this outfall as a combination of yard drains and heater drains. In the IP, EPA changed the outfall to consist of the discharge of heater drains only. The yard drains are now monitored under the MSGP as Outfall 011, and are substantially identical to outfalls 008, 009 and 010.

You did not list MSGP Outfall 015 which is monitored for coalpile runoff basin overflow.

For the MSGP, we analyze the 5 outfalls for iron quarterly. If there is a discharge, we will also analyze 015 for pH annually (TSS is not required because the pond is designed for a 10-year, 24-hour rainfall event. pH and TSS monitoring should not be required on any of the other outfalls (as confirmed by Thelma). Dioxin and PCBs monitoring should not be required per the DES exemption (as confirmed by Thelma).

Your list details only outfalls from the IP is confusing and problematic. Those outfalls are monitored per requirements laid out in the individual permit. Our SWPPP and MSGP is focused on stormwater outfalls which are separate, distinct, and labelled differently from the IP outfalls (I have attached our SWPPP site plan which shows both the old and new outfalls). NetDMR accurately represents our MSGP outfalls (and not the IP outfalls). Unfortunately, NetDMR contains incorrect monitoring requirements for our MSGP (as discussed above for TSS, pH, dioxin and PCBs). We request the on-line DMRs be corrected.

Thank you David, please feel free to contact me if you need additional clarification, Allan.

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Monday, February 04, 2019 2:00 PM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>; Murphy, Thelma (Hamilton) <murphy.thelma@epa.gov>
**Cc:** Walker, Tom <twalker@cecinc.com>; Cochrane, Alison <acochrane@cecinc.com>
**Subject:** Re: Schiller Station NHR05J008

Hi Allan,

My apologies as I've been out of the office on leave since last August. When we last communicated, I was awaiting the new NOI filing for Schiller so that I could notify you of the additional monitoring requirements per MSGP Part 6.2.5 resulting from the IP issuance. Attached please find a rough draft of the additional monitoring that I had prepared at that time. It appears that Outfall numbers have been revised to differentiate stormwater from process water flows? Could you please provide me with a crosswalk of the old and new Outfall IDs.

Regards,
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David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
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5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Thursday, January 3, 2019 12:05 PM
**To:** Murphy, Thelma (Hamilton); Gray, Davidj
**Cc:** Walker, Tom; Cochrane, Alison
**Subject:** RE: Schiller Station NHR05J008

Thank you Thelma, it looks like we are in full agreement. For clarification, the coalpile runoff collection pond is in fact designed to accept the volume of a 10-year 24-hour storm, so the TSS limit is NA. Will you folks be reviewing the DMRs for appropriate modifications? Again, thanks so much for your help, Allan.

**New Phone: (603) 230-7951**

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**From:** Murphy, Thelma (Hamilton) [mailto:murphy.thelma@epa.gov]
**Sent:** Wednesday, December 12, 2018 10:53 AM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>; Gray, Davidj <gray.davidj@epa.gov>
**Cc:** Walker, Tom <twalker@cecinc.com>
**Subject:** RE: Schiller Station NHR05J008

*** Exercise Caution - External Email ***

Allan,
My responses to your questions are in blue at the end of the paragraph.

Quarterly Monitoring for Iron at Outfalls 001, 004, 008, 012 and 015

- Outfall 008 is the discharge pipe from the Schiller Station Tank Farm containment area. As such, the valve on this pipe is maintained in a closed position until station BMPs dictate it be opened to drain the accumulated stormwater. Consequently, EPA's 0.1 inch/72 hour/30 minute sampling protocol does not fit. Please confirm that we may continue to operate the tank farm reservoir according to station BMPs and that the quarterly samples may be collected during one of the normally scheduled discharges. -yes
- Outfall 015 is for coalpile overflow. Because this is an infrequent event, we will enter NODI often. And because it is typically a quasi-emergency event, we will likely not be collecting a sample using the 0.1 inch/72 hour storm event protocol, and we may not be able to collect the sample in the first 30 minutes of discharge. It is also unclear as to whether the quarterly monitoring requirements for iron apply or if we must only collect an annual sample for pH (see below). Please confirm that samples may be collected whenever they become available and whether quarterly iron monitoring is required for coal pile overflow. - This outfall should be monitored for both the parameters associated with the coal pile runoff and for the benchmark of iron. Yes, it is acceptable to collect the sample when it occurs and use the NODI code as appropriate.

Annual Monitoring

- pH and TSS sampling for all 15 outfalls. I can't understand this requirement at all as it seems to me that our only benchmark is for iron. Perhaps there was confusion with the coalpile runoff special provision. Please confirm that this requirement is in error. Annual monitoring applies to the coal pile runoff and not to the outfalls not associated with this runoff.
- Outfall 015 should have an annual pH monitoring requirement per Table 8.0-2, but the TSS limitation should be waived as the pond is designed to accept a 10-year, 24-hour rainfall event. Please confirm. If the system is designed to treat the volume from a 10 yr- 24 hour storm event, the discharge is not subject to the 50 mg/l TSS limitation.
- "Impaired Water" monitoring of dioxin and PCB at Outfalls 001, 004, 008, 012 and 015. It is my understanding that the Lower Piscataqua River - South is marginally impaired for shellfishing due to dioxin and PCBs and that the source is unknown. Please note, however, that the attached table specifically exempts operators discharging into New Hampshire waters from monitoring for these two pollutants. Perhaps more importantly, voluntary monitoring performed on all the outfalls over 6 quarters under the previous permit yielded no detections for PCBs (all of 2016 and the first two quarters in 2017), nor for 2,3,7,8-TCDD (Q4 of 2015, all of 2016, and Q1 of 2018). Please confirm that this requirement is in error. Discharges to waters impaired for dioxin and PCBs do not have a monitoring requirement associated with them. The DMRs for your facility may need to be modified.

Please let me know if you have additional questions.

*Thelma Murphy*, Chief
Stormwater & Construction Permits Section
Office of Ecosystem Protection
5 Post Office Square (OEP06-1)
Boston, MA 02109
(617) 918-1615

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Monday, December 03, 2018 4:28 PM
**To:** Gray, Davidj <gray.davidj@epa.gov>
**Cc:** Murphy, Thelma (Hamilton) <murphy.thelma@epa.gov>; Walker, Tom <twalker@cecinc.com>
**Subject:** FW: Schiller Station NHR05J008

Are you still out there David? Please let me know if there is someone else I should reach out to, I'd like some feedback on these items before we head into Q1 2019? Thanks, Allan.

**New Phone: (603) 230-7951**

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**From:** Palmer, Allan
**Sent:** Friday, October 26, 2018 5:28 PM
**To:** Gray, Davidj <gray.davidj@epa.gov>

**Cc:** Walker, Tom <twalker@cecinc.com>; Cochrane, Alison <acochrane@cecinc.com>
**Subject:** Schiller Station NHR05J008

David, As promised in my voicemail, here's a follow-up email. Tom Walker and I have been trying to develop a sampling plan based upon the on-line DMRs and have run into a few stumbling blocks that I'd like to run by you:

Quarterly Monitoring for Iron at Outfalls 001, 004, 008, 012 and 015

- Outfall 008 is the discharge pipe from the Schiller Station Tank Farm containment area. As such, the valve on this pipe is maintained in a closed position until station BMPs dictate it be opened to drain the accumulated stormwater. Consequently, EPA's 0.1 inch/72 hour/30 minute sampling protocol does not fit. Please confirm that we may continue to operate the tank farm reservoir according to station BMPs and that the quarterly samples may be collected during one of the normally scheduled discharges.
- Outfall 015 is for coalpile overflow. Because this is an infrequent event, we will enter NODI often. And because it is typically a quasi-emergency event, we will likely not be collecting a sample using the 0.1 inch/72 hour storm event protocol, and we may not be able to collect the sample in the first 30 minutes of discharge. It is also unclear as to whether the quarterly monitoring requirements for iron apply or if we must only collect an annual sample for pH (see below). Please confirm that samples may be collected whenever they become available and whether quarterly iron monitoring is required for coal pile overflow.

Annual Monitoring

- pH and TSS sampling for all 15 outfalls. I can't understand this requirement at all as it seems to me that our only benchmark is for iron. Perhaps there was confusion with the coalpile runoff special provision. Please confirm that this requirement is in error.
- Outfall 015 should have an annual pH monitoring requirement per Table 8.0-2, but the TSS limitation should be waived as the pond is designed to accept a 10-year, 24-hour rainfall event. Please confirm.
- "Impaired Water" monitoring of dioxin and PCB at Outfalls 001, 004, 008, 012 and 015. It is my understanding that the Lower Piscataqua River – South is marginally impaired for shellfishing due to dioxin and PCBs and that the source is unknown. Please note, however, that the attached table specifically exempts operators discharging into New Hampshire waters from monitoring for these two pollutants. Perhaps more importantly, voluntary monitoring performed on all the outfalls over 6 quarters under the previous permit yielded no detections for PCBs (all of 2016 and the first two quarters in 2017), nor for 2,3,7,8-TCDD (Q4 of 2015, all of 2016, and Q1 of 2018). Please confirm that this requirement is in error.

I guess it ended up being more than I thought, but it's a pretty light load. Hopefully we can knock it all off without too much stress. Thanks for your consideration David, and please give me a call when you have a chance, Allan.

**New Phone: (603) 230-7951**

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Friday, August 17, 2018 8:28 AM

**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Cc:** Walker, Tom <twalker@cecinc.com>
**Subject:** Re: Scihiller Station NHR053359 NOT & New NOI

Hi Allan,

Regarding the MSGP, your approach is correct for obtaining a new authorization and then filing an NOT for NHR053359. My apologies for confusing you - my previous email was poorly written and I used the wrong acronym ("NOT" instead of "NOI")!

Regarding the DMRs for the new IP, they may have left the old DMR in place to accommodate 2nd quarter results that were still due? Regardless, I'll check with the permit writer and DMR staff to make sure it is updated to reflect the new permit requirements.

Thanks,

David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Tuesday, August 14, 2018 3:47 PM
**To:** Gray, Davidj
**Subject:** RE: Scihiller Station NHR053359 NOT & New NOI

David, Good news on the IP; I was able to get all the data adequately entered into the old DMRs, so I'm good for the month. Thanks, Allan.

**New Phone: (603) 230-7951**

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**From:** Palmer, Allan
**Sent:** Tuesday, August 14, 2018 2:40 PM
**To:** Gray, Davidj <gray.davidj@epa.gov>
**Cc:** Walker, Tom <twalker@cecinc.com>
**Subject:** RE: Scihiller Station NHR053359 NOT & New NOI

Hi David. Sorry, took some vacation time.

I'm happy to say that we were just last week able to get NHR053208 terminated. Moving on, I didn't think it prudent to file an NHR053359 NOT until we had a new MSGP in-place. We have filed our Criterion C Eligibility Form for a new permit for Schiller, but it is my understanding that we must wait at least 30 days before we can

submit our next NOI. We are overhauling the SWPPP to reflect the new permit conditions and hope to file the NOI as soon as everything is complete. Once we have a new permit, we will file the NOT for NHR053359. Does that make sense?

On a grander scale, I went to enter the July data for our new individual permit and find that the DMRs have not been updated to reflect new monitoring conditions and outfall modifications. Any suggestions on how I can submit? Thank you, Allan.

**New Phone: (603) 230-7951**

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**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Monday, August 06, 2018 9:59 AM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Cc:** Walker, Tom <twalker@cecinc.com>
**Subject:** Scihiller Station NHR053359 NOT & New NOI

Hi Allan,

I have not yet seen the NOT for Schiller? Is it still your intention to terminate NHR053359 and file a new NOI for MSGP coverage? By the way, the new NeT-MSGP platform can now accept electronic NOTs.

Regards,

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Gray, Davidj
**Sent:** Monday, June 18, 2018 11:05 AM
**To:** Palmer, Allan
**Cc:** Boisclair, Diane
**Subject:** Re: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358

Hi Allan,

I understand (and actually agree with) your concern on the additional iron monitoring. However, workgroup consensus prevailed that new operators need to begin monitoring anew. Discussions on 2020 MSGP permit
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include revisiting this issue along with other aspects of the monitoring requirements. Regarding the NOI/NeT-to-NeTDMR process, monitoring requirements (i.e., "limit sets") are populated automatically based on the NOI. However, there were limitations on the previous NeT Platform that could not always capture the required impaired waters monitoring accurately in the case of facilities located in Region 1 (i.e., MA & NH). Thus the language in MSGP Part 6.2.4.1: "*Permittees should consult the appropriate EPA Regional Office for any available guidance regarding required monitoring parameters under this part*." and the published monitoring guidance you cite. I did see those early initial samples with NDs for dioxins and PCBs for Schiller - so at least that erroneous monitoring ceased thereafter. The NeT Platform currently under development intends to fix this and make other enhancements.

With respect to Schiller specifically, the Region will manually-populate your NeTDMR based on your NOI and the additional monitoring required as a result of the IP. When I receive your new NOI, I will notify you of the additional monitoring requirements per MSGP Part 6.2.5. Note: Though electronic NOT functionality is not yet available, the new NeT Platform can accept new NOIs electronically, see below:

**ALERT!**
The U.S. EPA's Multi-Sector General Permit (MSGP) eReporting submission system is transitioning to a new system on **April 1, 2018**. EPA is updating the NeT-MSGP electronic reporting tool as part of a planned long-term enhancement for NPDES e-Reporting. Some electronic forms will be **temporarily** unavailable. Please follow the instructions below on how to submit the following forms:

- **New NOIs**: To submit a new NOI electronically, login to NeT-MSGP.
- **Existing Permittees**: To change an existing NOI, or submit an Annual Report, NOT, or NOEs, you must submit a paper form. Please follow the instructions below on how to submit a paper form.
- **All Permittees**: The process for electronically submitting DMRs has not changed. Please continue to use NeTDMR--the NPDES eReporting tool for DMRs. If your EPA regional office has granted you an electronic reporting waiver, you can mail the paper forms provided in the 2015 MSGP.

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## New NOIs

NeT-MSGP is accessed through EPA's Central Data Exchange (CDX).

- **New Users**: If you do not have a CDX account,
  - create a new account to add to the NeT-MSGP program, or follow step-by-step instructions:
  - learn how to create a new MSGP account in CDX
- **Existing CDX Users**: If you already have a CDX account,
  - add the NeT-MSGP program to your CDX, or follow step-by-step instructions:
  - learn how to add the MSGP program service to your CDX account

- **Existing Net-MSGP Users**: No action is required if you have an existing CDX account with the old Net-MSGP service. You will now see two MSGP program services under your CDX account:
    - The **OLD** service is called "LEGACYNETEPAMSGP: NeT - EPA NPDES Stormwater Industrial Multi-Sector General Permit (Legacy)"
    - The **NEW** service is called "NETEPAMSGP: NeT - EPA Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity"

Regards,

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David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Friday, June 15, 2018 1:19 PM
**To:** Gray, Davidj
**Cc:** Boisclair, Diane
**Subject:** RE: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358

Hey David, thanks for the guidance. We've started collecting iron samples again, which just seems unfair.

Merrimack NOT went in the mail yesterday, Schiller should go today.

Regarding going forward with Schiller, I think the best path is to just cancel and start over. There are too many changes to try and make it fit NHR053359.

So how does the NOI-to-DMRs process work anyway? Is it automated, or do different contractors or EPA folks input individual requirements? Since becoming involved with Schiller, I noticed that Tom Walker has been sampling and reporting things like PCBs & dioxin which makes no sense to me based on... https://www3.epa.gov/region1/npdes/stormwater/assets/pdfs/msgp-2015-part-624-parameters-nh.pdf. Just curious how everythinb gets established.

Thanks, Allan.
New Phone: (603) 230-7951
~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

**From:** Gray, Davidj [mailto:gray.davidj@epa.gov]
**Sent:** Friday, June 15, 2018 10:21 AM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Cc:** Boisclair, Diane <boisclair.diane@epa.gov>
**Subject:** Re: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358

Hi Allan,

Regarding benchmark monitoring for iron, you will need complete monitoring again as neither the prior permit nor the data collected under it are transferrable to the new owner. Authorization under the new permits (NHR053359 & NHR053358) were granted on 12/27/17, so any data collected after that (i.e., 2018 Q1 and Q2) can be used to satisfy the minimum of four quarterly samples.

I'll await the NOTs for the old permits. Regarding Schiller Station (NHR053359), do I understand that you prefer two separate permit authorizations for different owners or industrial activities; or, rather than submitting a complicated Change NOI, you would rather submit a new clean NOI for the entire site (which would in turn require submitting an NOT for the current permit NHR053359)?

Regards,

~~~~~~~~~~~~~~~~~~~~~~~~~~~~~~

David J. Gray, P.E.
Office of Ecosystem Protection
U.S. Environmental Protection Agency, Region 1
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

Phone: 617.918.1577
eFax: 617.918.0577
gray.davidj@epa.gov

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**From:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Sent:** Tuesday, June 12, 2018 2:04 PM
**To:** Gray, Davidj
**Cc:** Boisclair, Diane
**Subject:** FW: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358
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David, As a follow-up to my voicemail, I will upload the same info from our two old permit submittals to the DMRs for our two new permits.
Schiller Station: NHR053208 & NHR053359
Merrimack Station: NHR053182 & NHR053358

I hope to get NOTs off to you for the two old permits soon so that Q2 will only report under the new permits.

Question: We had met our benchmarks for NHR053182 and so were no longer testing for iron. Do we need to start analyzing for iron again because of the new permit?

We will be submitting another NOI for Schiller Station (with Tom Walker's assistance) due to the changes caused by revisions to the individual permit.

OK? Please let me know if you have any questions, Allan.

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**From:** NetDmr_R1 [mailto:NetDmr_R1@epa.gov]
**Sent:** Tuesday, June 12, 2018 8:18 AM
**To:** Palmer, Allan <Allan.Palmer@graniteshorepower.com>
**Cc:** Gray, Davidj <gray.davidj@epa.gov>; Warner, Suzanne <Warner.Suzanne@epa.gov>; Handler, Neil <Handler.Neil@epa.gov>; McDonald, Marie <mcdonald.marie@epa.gov>
**Subject:** RE: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358

At this time both permits are active the permit so your are required to submit for both of these permit numbers. It appears that an NOT was not submitted for permit number NHR053182. Permit number NHR053358 was issued in December 2017 and monitoring was required to start in January 2018. If you think that this is in error you need to contact David Gray of our permit section and he will contact us with any corrections that may need to be made. If you have any questions feel free to contact us. thank you

Diane Boisclair
Environmental Protection Specialist
Water Technical Unit
(617) 918-1762
Fax (617) 918-0762

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**From:** Palmer, Allan [mailto:Allan.Palmer@graniteshorepower.com]
**Sent:** Monday, June 11, 2018 2:41 PM
**To:** NetDmr_R1 <NetDmr_R1@epa.gov>
**Subject:** FW: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358

Dear NetDMR Team,

Stormwater DMRs were submitted for Merrimack Station for 2018 Q1 under MSGP NHR053182. It was my understanding that this new permit, NHR053358, would not officially kick in until Q2. Please let me know how you would like us to proceed with reporting under the two permits.

Thank you, Allan.

Begin forwarded message:

**From:** <netdmr-notification@epa.gov>
**Date:** June 7, 2018 at 10:00:39 PM CDT
**To:** <boisclair.diane@epa.gov>, <handler.neil@epa.gov>, <elizabeth.tillotson@graniteshorepower.com>, <mirza.sabah@epa.gov>, <prodnetdmria@gmail.com>, <leann.plagens@cci.com>, <kim.ed@epa.gov>, <Voisin.Edward@epa.gov>, <mcdonald.marie@epa.gov>
**Subject: NOTICE OF NON-RECEIPT for Report Required by Your Permit - Overdue DMRs by 7 days for Permit NHR053358**

Dear Permittee or Authorized Representative:

We are contacting you to assist you in complying with your NPDES permit reporting requirements. This is a notification that we have not received a required discharge monitoring report, but is NOT an official notice of violation.

As of **06/07/2018**, the following Discharge Monitoring Reports (DMRs) are overdue to **EPA Region 01 - New Hampshire and Massachusetts** by 7 days:

| Facility Name | NPDES ID | Permitted Feature - Designator | Monitoring Period End Date | DMR Due Date |
|---|---|---|---|---|
| MERRIMACK STATION | NHR053358 | S001 - O1 | 03/31/2018 | 05/31/2018 |
| MERRIMACK STATION | NHR053358 | S002 - O1 | 03/31/2018 | 05/31/2018 |

Failure to submit your DMR(s) in a timely fashion constitutes non-compliance with the requirements of your NPDES permit **NHR053358**. Please be sure to submit all overdue DMRs immediately via NetDMR.

If you have already submitted your DMR, please contact us immediately at the email address below so we can help resolve this problem. If you have questions, require technical assistance or think this information is in error, please email R1.NetDMR@epa.gov with your NPDES ID, your contact information, and specific information regarding the problem so we can investigate the issue. After you submit your overdue DMR(s) the system will automatically recognize that you have done this.

As a reminder, compliance information about your permit is available to the public on EPA's Enforcement Compliance History Online (ECHO) website at https://echo.epa.gov.

Sincerely,

NetDMR Team

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