Message

From: Gray, Davidj [gray.davidj@epa.gov]
Sent: 2/4/2019 6:59:48 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
Attachments: Granite Shore Power NH053359 Add Monitoring Req.docx

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
5 Post Office Square, Ste. 100 (OEP06-1)
Boston, MA 02109-3912

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

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

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
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*** 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

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

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

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,

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From: Palmer, Allan <Allan.Palmer@graniteshorepower.com>
Sent: Tuesday, August 14, 2018 3:47 PM
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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

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

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,
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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 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.

Top of Page

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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gray.davidj@epa.gov

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…
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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,

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

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gray.davidj@epa.gov

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

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
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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.

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

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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