

From: [Spanos, Stergios](#)
To: [Weitzler, Ellen](#)
Cc: [Clark Freise](#); [O'Donovan, Thomas](#); [Tracy.Wood@des.nh.gov](#); [Ted Diers](#); [Franz, Hayley](#); [Cobb, Michael](#); [Arsenault, Dan](#); [Moraff, Kenneth](#); [Murphy, Thelma \(Hamilton\)](#); [Dixon, Sean](#)
Subject: Great Bay Total Nitrogen Draft General Permit and Fact Sheet
Date: Wednesday, November 6, 2019 11:14:52 AM
Attachments: [RE Great Bay Total Nitrogen draft Draft General Permit and Fact Sheet.msg](#)
[.msg](#)

Hi Ellen,

On Monday November 4th DES (Ted Diers, Tracy Wood, Stergios Spanos, Hayley Franz and Teresa Ptak) had a phone call with EPA (Dan Arsenault and Michael Cobb) to go over the comments conveyed by DES in the October 22nd email (attached). DES appreciates the effort Mike and Dan took in preparing for this call. DES anticipates that with final editing of the language, the documents are now pretty much ready for joint public notice. Please provide a final version of the draft permit and fact sheet in the form that will be put on joint public notice.

The following is a summary of the conversation, covering the six items listed in the October 22nd email, and comments in the draft permit and fact sheet.

Item 1. (b) (5) [Redacted]

Response – (b) (5) [Redacted]

[Redacted] Finally, EPA is adding a statement into the permit that applicants may request a schedule if they need to meet the annual limits and cannot meet them right now (see attached email message from Michael Cobb). (b) (5) [Redacted]

Item 2. (b) (5) [Redacted]

Response – (b) (5) [Redacted]

Item 3. (b) (5) [Redacted]

Response – (b) (5) [Redacted]

[Redacted] Note that the non-point source work is now optional in the permit.

Item 4. Consider adding a “Report” requirement for TKN, nitrate, and nitrite in the permit. (see permit comment SS3)

Response – EPA agreed and is adding it to the permit. They are also adding a report requirement for ammonia.

Item 5. How to deal with “below minimum level (ML)” values needs to be rectified. (see permit comment SS7)

Response – EPA will change the language such that values below an ML of 0.25 mg/l will be taken as “zero”.

Item 6. There should be a statement somewhere (in the Permit, Fact Sheet or both) that the baseline for point and nonpoint source is 2012-2016. Any reductions or additions after 2016 should be credited or debited against that baseline. (see permit comment SS13)

Response – EPA will clarify that the baseline for the waste water treatment plants is 2012-2016 and that the baseline for the NPS reductions is the data that went into the GBNPSS report (2011), or what the community calculates based on more recent studies. (b) (5)

The six Items above address comments SS1, SS2, SS3, SS4, SS5, SS6, SS7, and SS13 in the permit. In addition, the following permit comments were discussed:

SS8 – EPA will add “denitrification”

SS9 – EPA will add the suggesting language

SS10 – EPA will change the language to specify that the permittee shall provide “the annual certification” to EPA and NHDES annually

SS11 – EPA will write language to specify that the data is to be submitted to EPA and DES. For DES, it is to be submitted to email WQdata@des.nh.gov. The due date is to be November 1st (instead of August 15th), and

SS12 – EPA will edit to “Chlorophyll a”

For the fact sheet, the following comments of significance were discussed:

SS3 – (b) (5)

SS4 – EPA is removing all of Table 4

MC8 – (b) (5) and

SS12 – This language has been removed, as EPA has rewritten this section on Essential Fish Habitat

If you have any questions or would like to correct/clarify or discuss anything, let me know.

~Stergios

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