

September 21, 2005

Mr. Gregory Trundy
Rumford-Mexico Sewerage District
P.O. Box 160
Rumford, ME 04276

RE: Maine Pollutant Discharge Elimination System (MEPDES) Permit #ME0101486
Maine Waste Discharge License (WDL) Application #W002686-5L-F-R
Final Permit/License

Dear Mr. Trundy:

Enclosed, please find a copy of your **final** MEPDES permit and Maine WDL which was approved by the Department of Environmental Protection. This permit/license for your facility replaces Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0101486 last issued for your facility by the Department on September 1, 1994. Please read the permit/license and its attached conditions carefully. You must follow the conditions in the order to satisfy the requirements of law. Any discharge not receiving adequate treatment is in violation of State law and is subject to enforcement action.

Any interested person aggrieved by a Department determination made pursuant to applicable regulations, may appeal the decision following the procedures described in the attached DEP FACT SHEET entitled "*Appealing a Commissioner's Licensing Decision.*"

We would like to make you aware of the fact that your monthly Discharge Monitoring Reports (DMRs) may not reflect the revisions in this permitting action for several months however, you are required to report applicable test results for parameters required by this MEPDES permit/WDL that do not appear on the DMR. Please see attached April 2003 O&M Newsletter article regarding this matter.

If you have any questions regarding the matter, please feel free to call me at 287-7659.

Sincerely,

Bill Hinkel
Division of Water Resource Regulation
Bureau of Land and Water Quality

Enc. cc: Denise Behr, DEP Roger Janson, USEPA

DMR Lag

When the Department renews discharge permits, the parameter limits may change or parameters may be added or deleted. In some cases, it is merely the replacement of the federally issued NPDES permit with a state-issued MEPDES permit that results in different limits. When the new permit is finalized, a copy of the permit is passed to our data entry staff for coding into EPA's Permits Compliance System (PCS) database. PCS was developed in the 1970's and is not user-friendly. Entering or changing parameters can take weeks or even months.

This can create a lag between the time your new permit becomes effective and the new permit limits appearing on your DMRs. If you are faced with this, it can create three different situations that have to be dealt with in different ways.

1. If the parameter was included on previous DMRs, but only the limit was changed, there will be a space for the data. Please go ahead and enter it. When the changes are made to PCS, the program will have the data and compare it to the new limit.
2. When a parameter is eliminated from monitoring in your new permit, but there is a delay in changing the DMR, you will have a space on the DMR that needs to be filled. For a parameter that has been eliminated, please enter the space on the DMR for that parameter only with "NODI-9" (No Discharge Indicator Code #9). This code means monitoring is conditional or not required this monitoring period.

3. When your new permit includes parameters for which monitoring was not previously required, and coding has not caught up on the DMRs, there will not be any space on the DMR identified for those parameters. In that case, please fill out an extra sheet of paper with the facility name and permit number, along with all of the information normally required for each parameter (parameter code, data, frequency of analysis, sample type, and number of exceedances). Each data point should be identified as monthly average, weekly average, daily max, etc. and the units of measurement such as mg/L or lb/day. Staple the extra sheet to the DMR so that the extra data stays with the DMR form. Our data entry staff cannot enter the data for the new parameters until the PCS coding catches up. When the PCS coding does catch up, our data entry staff will have the data right at hand to do the entry without having to take the extra time to seek it from your inspector or from you.

EPA is planning significant improvements for the PCS system that will be implemented in the next few years. These improvements should allow us to issue modified permits and DMRs concurrently. Until then we appreciate your assistance and patience in this effort.

Phil Garwood

IN THE MATTER OF

RUMFORD-MEXICO SEWERAGE DISTRICT) MAINE POLLUTANT DISCHARGE
RUMFORD, OXFORD COUNTY, MAINE) ELIMINATION SYSTEM PERMIT
PUBLICLY OWNED TREATMENT WORKS) AND
RUMFORD POINT FACILITY) WASTE DISCHARGE LICENSE
#ME0101486)
#W002685-5L-F-R) **APPROVAL**) **RENEWAL**

Pursuant to the provisions of the Federal Water Pollution Control Act, Title 33 USC, Section 1251, *et seq.* and Maine law, 38 M.R.S.A., Section 414-A *et seq.*, and applicable regulations, the Department of Environmental Protection (Department) has considered the application of the RUMFORD-MEXICO SEWERAGE DISTRICT (District), with its supportive data, agency review comments, and other related materials on file and FINDS THE FOLLOWING FACTS:

APPLICATION SUMMARY

The District has applied for renewal of Waste Discharge License (WDL) #W002685-5L-D-R, which was issued on August 8, 2000, and WDL modification #W002685-5L-E-M / Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0101486, which was issued on June 29, 2001. The 8/8/00 WDL authorized the monthly average discharge of up to 0.019 million gallons per day (MGD) of secondary treated wastewater to the Androscoggin River, Class C, in Rumford, Maine and the 6/29/01 WDL Modification / MEPDES permit incorporated the terms and conditions of the MEPDES program. The 6/29/01 MEPDES permit expired on August 8, 2005.

PERMIT SUMMARY

This permitting action is similar to the 8/8/00 licensing action and 6/29/01 permitting action in that it is:

1. Carrying forward the monthly average discharge flow limit of 0.019 MGD;
2. Carrying forward technology-based monthly average, weekly average and daily maximum concentration and mass limits for biochemical oxygen demand (BOD₅) and total suspended solids (TSS);
3. Carrying forward the requirement to achieve a minimum of 85% removal for BOD₅ and TSS;
4. Carrying forward the daily maximum, technology-based concentration limit of 0.3 ml/L for settleable solids;
5. Carrying forward the monthly average and daily maximum concentration limits for *Escherichia coli* bacteria;
6. Carrying forward the daily maximum, technology-based concentration limit of 1.0 mg/L for total residual chlorine (TRC);
7. Carrying forward the technology-based pH range limit of 6.0 – 9.0 standard units (SU); and
8. Carrying forward the minimum monitoring frequency requirements for all monitored parameters.

This permitting action is different from the 8/10/00 licensing action and 6/29/01 permitting action in that it is:

1. Establishing monthly average concentration and reporting requirements for total phosphorus and orthophosphate during the warm season (June 1 through September 30) of calendar year 2006 and a minimum monitoring frequency requirement of once per month to assist the Department in evaluating the District's phosphorus loading contribution to the receiving water; and
2. Requiring the submission of a Wet Weather Flow Management Plan to the Department for review and comment.

CONCLUSIONS

BASED on the findings in the attached Fact Sheet dated September 21, 2005, and subject to the Conditions listed below, the Department makes the following CONCLUSIONS:

1. The discharge, either by itself or in combination with other discharges, will not lower the quality of any classified body of water below such classification.
2. The discharge, either by itself or in combination with other discharges, will not lower the quality of any unclassified body of water below the classification which the Department expects to adopt in accordance with state law.
3. The provisions of the State's antidegradation policy, 38 M.R.S.A. §464(4)(F), will be met, in that:
 - (a) Existing in-stream water uses and the level of water quality necessary to protect and maintain those existing uses will be maintained and protected;
 - (b) Where high quality waters of the State constitute an outstanding national resource, that water quality will be maintained and protected;
 - (c) The standards of classification of the receiving water body are met or, where the standards of classification of the receiving water body are not met, the discharge will not cause or contribute to the failure of the water body to meet the standards of classification;
 - (d) Where the actual quality of any classified receiving water body exceeds the minimum standards of the next highest classification that higher water quality will be maintained and protected; and
 - (e) Where a discharge will result in lowering the existing water quality of any water body, the Department has made the finding, following opportunity for public participation, that this action is necessary to achieve important economic or social benefits to the State.
4. The discharge will be subject to effluent limitations that require application of best practicable treatment as defined in Maine law, 38 M.R.S.A., §414-A(1)(D).

ACTION

THEREFORE, the Department APPROVES the above noted application of the RUMFORD-MEXICO SEWERAGE DISTRICT to discharge a monthly average flow of up to 0.019 MGD of secondary treated wastewater to the Androscoggin River, Class C, in Rumford, Maine, SUBJECT TO THE ATTACHED CONDITIONS, and all applicable standards and regulations including:

1. "Maine Pollutant Discharge Elimination System Permit Standard Conditions Applicable To All Permits," revised July 1, 2002, copy attached.
2. The attached Special Conditions, including any effluent limitations and monitoring requirements.
3. The expiration date of this permit is five (5) years from the date of signature below.

DONE AND DATED AT AUGUSTA, MAINE, THIS _____ DAY OF _____, 2005.

DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY: _____
DAWN R. GALLAGHER, Commissioner

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application: March 28, 2005

Date of application acceptance: March 28, 2005

Date filed with Board of Environmental Protection: _____.

SPECIAL CONDITIONS

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period **beginning the effective date of this permit and lasting through permit expiration**, the permittee is authorized to discharge secondary treated sanitary wastewater from **Outfall #001A** to the Androscoggin River. Such discharges shall be limited and monitored by the permittee as specified below⁽¹⁾:

Effluent Characteristic	Discharge Limitations						Minimum Monitoring Requirements	
	<u>Monthly Average</u> as specified	<u>Weekly Average</u> as specified	<u>Daily Maximum</u> as specified	<u>Monthly Average</u> as specified	<u>Weekly Average</u> as specified	<u>Daily Maximum</u> as specified	<u>Measurement Frequency</u> as specified	<u>Sample Type</u> as specified
Flow [50050]	0.019 MGD [03]	---	Report MGD [03]	---	---	---	Continuous [99/99]	Recorder [RC]
BOD₅ [00310]	4.8 lbs./day [26]	7.1 lbs./day [26]	7.9 lbs./day [26]	30 mg/L [19]	45 mg/L [19]	50 mg/L [19]	2/Month [02/30]	Composite ⁽²⁾ [24]
BOD₅ Percent Removal ⁽³⁾ [81010]	---	---	---	85% [23]	---	---	1/Month [01/30]	Calculate [CA]
TSS [00530]	4.8 lbs./day [26]	7.1 lbs./day [26]	7.9 lbs./day [26]	30 mg/L [19]	45 mg/L [19]	50 mg/L [19]	2/Month [02/30]	Composite ⁽²⁾ [24]
TSS Percent Removal ⁽³⁾ [81011]	---	---	---	85% [23]	---	---	1/Month [01/30]	Calculate [CA]
Settleable Solids [00545]	---	---	---	---	---	0.3 ml/L [25]	5/Week [05/07]	Grab [GR]
E. coli Bacteria ⁽⁴⁾ [31633]	---	---	---	142/100 ml ⁽⁵⁾ [13]	---	949/100 ml [13]	2/Month [02/30]	Grab [GR]
Total Residual Chlorine ⁽⁶⁾ [50060]	---	---	---	---	---	1.0 mg/L [19]	5/Week [05/07]	Grab [GR]
pH [00400]	---	---	---	---	---	6.0 – 9.0 SU [12]	5/Week [05/07]	Grab [GR]
Orthophosphate ⁽⁷⁾ (June 1, 2006 – Sept. 30, 2006) [04175]	Report lbs./day [26]	---	---	Report mg/L [19]	---	---	1/Month [01/30]	Composite ⁽²⁾ [24]
Total Phosphorus ⁽⁸⁾ (June 1, 2006 – Sept. 30, 2006) [00665]	Report lbs./day [26]	---	---	Report mg/L [19]	---	---	1/Month [0/30]	Composite ⁽²⁾ [24]

The italicized numeric values bracketed in the table and in subsequent text are code numbers that Department personnel utilize to code the monthly Discharge Monitoring Reports.

FOOTNOTES: See Page 6 of this permit for applicable footnotes.

SPECIAL CONDITIONS

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

FOOTNOTES:

1. **Monitoring** – All effluent monitoring shall be conducted at a location following the last treatment unit in the treatment process as to be representative of end-of-pipe effluent characteristics. Any change in sampling location must be approved by the Department in writing. Sampling and analysis must be conducted in accordance with: a) methods approved by 40 Code of Federal Regulations (CFR) Part 136; b) alternative methods approved by the Department in accordance with the procedures in 40 CFR Part 136; or c) as otherwise specified by the Department. Samples that are sent out for analysis shall be analyzed by a laboratory certified by the State of Maine's Department of Human Services.
2. **BOD, TSS and Phosphorus Sample Type** – Composite sample based on time interval, not flow proportioned.
3. **Percent Removal** – The treatment facility shall maintain a minimum of 85 percent removal of both biochemical oxygen demand and total suspended solids for all flows receiving secondary treatment. The percent removal shall be calculated based on influent and effluent concentration values. The percent removal shall be waived when the monthly average influent concentration is less than 200 mg/L.
4. **Seasonal Limits** – *E. coli* bacteria limits and monitoring requirements are seasonal and apply between May 15 and September 30 of each year. The Department reserves the right to require year-round disinfection to protect the health, safety and welfare of the public.
5. **Bacteria Reporting** – The monthly average *E. coli* bacteria limitation is a geometric mean limitation and sample results shall be reported as such.
6. **TRC Monitoring** – Monitoring for TRC is only required when elemental chlorine or chlorine-based compounds are in use for effluent disinfection. For instances when a facility has not disinfected with chlorine-based compounds for an entire reporting period, the facility shall report "NODI-9" for this parameter on the monthly DMR.
7. **Total Phosphorus** – Total phosphorus monitoring shall be performed in accordance with Attachment A of this permit, *Protocol For Total P Sample Collection and Analysis*, unless otherwise specified by the Department.
8. **Orthophosphate** – Orthophosphate monitoring shall be performed in accordance with Attachment B of this permit, *Protocol For Orthophosphate Sample Collection and Analysis*, unless otherwise specified by the Department.

SPECIAL CONDITIONS

B. NARRATIVE EFFLUENT LIMITATIONS

1. The effluent shall not contain a visible oil sheen, foam or floating solids at any time which would impair the usages designated by the classification of the receiving waters.
2. The effluent shall not contain materials in concentrations or combinations which are hazardous or toxic to aquatic life, or which would impair the usages designated by the classification of the receiving waters.
3. The discharge shall not cause visible discoloration or turbidity in the receiving waters which would impair the usages designated by the classification of the receiving waters.
4. Notwithstanding specific conditions of this permit the effluent must not lower the quality of any classified body of water below such classification, or lower the existing quality of any body of water if the existing quality is higher than the classification.

C. DISINFECTION

If chlorination is used as the means of disinfection, an approved chlorine contact tank providing the proper detention time consistent with good engineering practice must be utilized followed by a dechlorination system if the imposed total residual chlorine (TRC) limit cannot be achieved by dissipation in the detention tank. The TRC in the effluent shall at no time cause any demonstrable harm to aquatic life in the receiving waters. The dose of chlorine applied, if necessary, shall provide a TRC concentration that will effectively reduce *E. coli* bacteria levels to or below those specified in Special Condition A, "*Effluent Limitation and Monitoring Requirements*," above.

D. TREATMENT PLANT OPERATOR

The treatment facility must be operated by a person holding a minimum of a **Grade II** certificate pursuant to Title 32 M.R.S.A., Section 4171 et seq. All proposed contracts for facility operation by any person must be approved by the Department before the licensee may engage the services of the contract operator.

E. MONITORING AND REPORTING

Monitoring results obtained during the previous month shall be summarized for each month and reported on separate Discharge Monitoring Report (DMR) forms provided by the Department and **postmarked on or before the thirteenth (13th) day of the month or hand-delivered to the Department's Regional Office such that the DMR's are received by the Department on or before the fifteenth (15th) day of the month** following the completed reporting period. A signed copy of the DMR and all other reports required herein shall be submitted to the following address:

Department of Environmental Protection
Bureau of Land and Water Quality
Division of Engineering, Compliance and Technical Assistance
17 State House Station
Augusta, ME 04333-0017

SPECIAL CONDITIONS

F. LIMITATIONS FOR INDUSTRIAL USERS

Pollutants introduced into the wastewater collection and treatment system by a non-domestic source (user) shall not pass through or interfere with the operation of the treatment system.

G. UNAUTHORIZED DISCHARGES

The permittee is authorized to discharge only in accordance with the terms and conditions of this permit and only from Outfall #001A. Discharges of wastewater from any other point source are not authorized under this permit, and shall be reported in accordance with Standard Condition B(5), *Bypasses*, of this permit.

H. NOTIFICATION REQUIREMENT

In accordance with Standard Condition D, the permittee shall notify the Department of the following.

1. Any introduction of pollutants into the wastewater collection and treatment system from an indirect discharger in a primary industrial category discharging process wastewater; and
2. Any substantial change (increase or decrease) in the volume or character of pollutants being introduced into the wastewater collection and treatment system by a source introducing pollutants into the system at the time of permit issuance. For the purposes of this section, notice regarding substantial change shall include information on:
 - (a) the quality and quantity of wastewater introduced to the wastewater collection and treatment system; and
 - (b) any anticipated impact caused by the change in the quantity or quality of the wastewater to be discharged from the treatment system.

I. WET WEATHER FLOW MANAGEMENT PLAN

The treatment facility staff shall develop and maintain a Wet Weather Management Plan to direct the staff on how to operate the facility effectively during periods of high flow. The Department acknowledges that the existing collection system may deliver flows in excess of the monthly average design capacity of the treatment plant during periods of high infiltration and rainfall.

On or before March 1, 2006, the permittee shall submit to the Department for review and approval, a new or revised Wet Weather Management Plan that conforms to Department guidelines for such plans [*PCS Code 06799*]. The revised plan shall include operating procedures for a range of intensities, address solids handling procedures (including septic waste and other high strength wastes if applicable) and provide written operating and maintenance procedures during the events.

Once the Wet Weather Management Plan has been approved, the permittee shall review their plan annually and record any necessary changes to keep the plan up to date.

SPECIAL CONDITIONS

J. OPERATION & MAINTENANCE (O&M) PLAN

The permittee shall maintain a current written comprehensive Operation & Maintenance (O&M) Plan at the facility. The plan shall provide a systematic approach by which the permittee shall at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit.

By December 31 of each year, or within 90 days of any process changes or minor equipment upgrades, the permittee shall evaluate and modify the O&M Plan including site plan(s) and schematic(s) for the wastewater treatment facility to ensure that it is up-to-date. The O&M Plan shall be kept on-site at all times and made available to Department and USEPA personnel upon request.

Within 90 days of completion of new and or substantial upgrades of the wastewater treatment facility, the permittee shall submit the updated O&M Plan to their Department inspector for review and comment.

K. REOPENING OF PERMIT FOR MODIFICATIONS

Upon evaluation of the tests results or monitoring requirements specified in Special Conditions of this permitting action, new site specific information, or any other pertinent test results or information obtained during the term of this permit, the Department may, at any time, and with notice to the permittee, modify this permit to: (1) include effluent limits necessary to control specific pollutants or whole effluent toxicity where there is a reasonable potential that the effluent may cause water quality criteria to be exceeded; (2) require additional effluent or ambient water quality monitoring if results on file are inconclusive; or (3) change monitoring requirements or limitations based on new information.

L. SEVERABILITY

In the event that any provision, or part thereof, of this permit is declared to be unlawful by a reviewing court, the remainder of the permit shall remain in full force and effect, and shall be construed and enforced in all respects as if such unlawful provision, or part thereof, had been omitted, unless otherwise ordered by the court.

Attachment A

Protocol for Total P Sample Collection and Analysis

Approved Analytical Methods: EPA 365.2, SM 4500-P B.5 E.

Sample Collection: The Maine DEP is requesting that total phosphorus analysis be conducted on composite effluent samples. Facilities can use individual collection bottles or a single jug made out of glass or polyethylene. Bottles and/or jugs should be cleaned prior to each use with dilute HCL. This cleaning should be followed by several rinses with distilled water. The sampler hoses should be cleaned, as needed.

Sample Preservation: During compositing the sample must be at 0-4 degrees C. If the sample is being sent to a commercial laboratory or analysis cannot be performed the day of collection then the sample must be preserved by the addition of 2 mls of concentrated H₂SO₄ per liter and refrigerated at 0-4 degrees C. The holding time for a preserved sample is 28 days

QA/QC: Run a distilled water blank and at least 2 standards with each series of samples. If standards do not agree within 2% of the true value then prepare a new calibration curve.

Every month run a blank on the composite jug and sample line. Automatically, draw distilled water into the sample jug using the sample collection line. Let this water set in the jug for 24 hours and then analyze for total phosphorus. Preserve this sample as described above.

April 2004

Attachment B

Protocol for Orthophosphate Sample Collection and Analysis

Approved Analytical Methods: EPA 365.2, SM 4500-P.E.

Sample Collection: The Maine DEP is requesting that orthophosphate analysis be conducted on composite effluent samples. Facilities can use individual collection bottles or a single jug made out of glass or polyethylene. Bottles and/or jugs should be cleaned prior to each use with dilute HCL. This cleaning should be followed by several rinses with distilled water. The sampler hoses should be cleaned, as needed.

Sample Preservation: During compositing the sample must be at 0-4 degrees C. The sample must be filtered immediately (within 15 minutes) after collection using a pre-washed 0.45-um membrane filter. Be sure to follow one of the pre-washing procedures described in the approved methods. Also, be aware that you will likely want to use a separate suction hose and collection container for the orthophosphate filtering process. If the sample is being sent to a commercial laboratory or analysis cannot be performed within 2 hours after collection then the sample must be kept at 0-4 degrees C. There is a 48-hour holding time for this sample although analysis should be done sooner, if possible.

QA/QC: Same as described in Total P Protocol.

April 2004

**MAINE POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT
AND
MAINE WASTE DISCHARGE LICENSE**

FACT SHEET

DATE: SEPTEMBER 21, 2005

**PERMIT NUMBER: #ME0101486
LICENSE NUMBER: #W002685-5L-F-R**

NAME AND ADDRESS OF APPLICANT:

**RUMFORD MEXICO SEWERAGE DISTRICT
P.O.BOX 160
RUMFORD, MAINE 04276**

COUNTY: OXFORD

NAME AND ADDRESS WHERE DISCHARGE OCCURS:

**RUMFORD-MEXICO SEWERAGE DISTRICT
US ROUTE 2 – RIVER ROAD
RUMFORD (POINT), MAINE 04276**

RECEIVING WATER/CLASSIFICATION: ANDROSCOGGIN RIVER/CLASS C

**COGNIZANT OFFICIAL AND TELEPHONE NUMBER: MR. GREGORY TRUNDY
SUPERINTENDENT
(207) 364-7225**

1. APPLICATION SUMMARY

Application: The Rumford-Mexico Sewerage District (District) has applied for renewal of Waste Discharge License #W002685-5L-D-R, which was issued on August 8, 2000, and WDL modification #W002685-5L-E-M / Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0101486, which was issued on June 29, 2001. The 8/8/00 WDL authorized the monthly average discharge of up to 0.019 million gallons per day (MGD) of secondary treated wastewater to the Androscoggin River, Class C, in Rumford, Maine and the 6/29/01 WDL Modification / MEPDES permit incorporated the terms and conditions of the MEPDES program. The 6/29/01 MEPDES permit expired on August 8, 2005.

2. PERMIT SUMMARY

a. Terms and Conditions **This permitting action is similar to the 8/8/00 licensing action and 6/29/01 permitting action in that it is:**

1. Carrying forward the monthly average discharge flow limit of 0.019 MGD;
2. Carrying forward technology-based monthly average, weekly average and daily maximum concentration and mass limits for biochemical oxygen demand (BOD₅) and total suspended solids (TSS);
3. Carrying forward the requirement to achieve a minimum of 85% removal for BOD₅ and TSS;
4. Carrying forward the daily maximum, technology-based concentration limit of 0.3 ml/L for settleable solids;
5. Carrying forward the monthly average and daily maximum concentration limits for *Escherichia coli* bacteria;
6. Carrying forward the daily maximum, technology-based concentration limit of 1.0 mg/L for total residual chlorine (TRC);
7. Carrying forward the technology-based pH range limit of 6.0 – 9.0 standard units (SU); and
8. Carrying forward the minimum monitoring frequency requirements for all monitored parameters.

This permitting action is different from the 8/10/00 licensing action and 6/29/01 permitting action in that it is:

1. Establishing monthly average concentration and mass reporting requirements for total phosphorus and orthophosphate during the warm season (June 1 through September 30) of calendar year 2006 and a minimum monitoring frequency requirement of once per month to assist the Department in evaluating the District's phosphorus loading contribution to the receiving water; and
2. Requiring the submission of a Wet Weather Flow Management Plan to the Department for review and comment

b. History: The most recent licensing/permitting actions include the following:

April 20, 1994 – The Department issued WDL #W002685-58-C-R to the District for the monthly average discharge of up to 0.019 MGD of secondary treated wastewater to the Androscoggin River in Rumford. The 4/20/94 WDL superseded WDL #W002685-58-B-R issued on March 8, 1989, and previous WDLs issued on September 14, 1983, March 28, 1979 and August 13, 1974.

2. PERMIT SUMMARY (cont'd)

September 1, 1994 – The U.S. Environmental Protection Agency (USEPA) issued National Pollutant Discharge Elimination System (NPDES) permit #ME0101486 to the District for the discharge from the Rumford Point Facility.

February 15, 1995 – The Department issued a letter to the District exempting the Rumford Point Facility from toxics testing under Department rule Chapter 530.5, *Surface Water Toxics Control Program* on the basis that the discharge is less than 50,000 gallons per day of domestic sewage and that the facility is a USEPA minor facility of less than 1.0 MGD and has a chronic dilution factor of greater than 1000:1.

May 23, 2000 – Pursuant to Maine law, 38 M.R.S.A. §420 and §413 and Department rule, 06-096 CMR Chapter 519, *Interim Effluent Limitations and Controls for the Discharge of Mercury*, the Department issued a *Notice of Interim Limits for the Discharge of Mercury* to the permittee thereby administratively modifying WDL #W002685-58-C-R by establishing interim monthly average and daily maximum effluent concentration limits of 4.5 parts per trillion (ppt) and 6.8 ppt, respectively, and a minimum monitoring frequency requirement of 2 tests per year for mercury. It is noted the limitations have not been incorporated into Special Condition A, *Effluent Limitations And Monitoring Requirements*, of this permit as limitations and monitoring requirements have been subject to numerous modifications in recent years. However, the interim limitations remain in effect and enforceable and any modifications to the limits and or monitoring requirements will be formalized outside of this permitting document.

August 8, 2000 – The Department issued WDL #W002685-5L-D-R to the District for the monthly average discharge of up to 0.019 MGD of secondary treated wastewater to the Androscoggin River in Rumford. The 8/8/00 WDL superseded WDL #W002685-58-C-R issued on April 20, 1994 and is scheduled to expire on August 8, 2005.

January 12, 2001 – The Department received authorization from the USEPA to administer the National NPDES permit program in Maine, excluding areas of special interest to Maine Indian Tribes. From that point forward, the program has been referred to as the Maine Pollutant Discharge Elimination System (MEPDES) permit program.

June 29, 2001 – The Department issued WDL Modification #W002685-5L-E-M / MEPDES permit #ME0101486 to the District for the monthly average discharge of up to 0.019 MGD of secondary treated wastewater to the Androscoggin River in Rumford. The 6/29/01 MEPDES permit is scheduled to expire on August 8, 2005.

January 3, 2005 – The Department issued a draft document entitled, *Androscoggin River Total Maximum Daily Load, Gulf Island Pond, Livermore Falls Impoundment, December 2004*, for public comment.

2. PERMIT SUMMARY (cont'd)

March 28, 2005 – The District submitted a General Application for renewal of the 6/29/01 MEPDES permit. The application was accepted for processing on March 28, 2005 and was assigned WDL #W002685-5L-F-R/MEPDES #ME0101486.

May 2005 – The Department submitted the *Androscoggin River Total Maximum Daily Load, Gulf Island Pond, Livermore Falls Impoundment, December 2004* to the USEPA.

July 18, 2005 – The USEPA approved a total maximum daily load (TMDL) entitled, May 2005 TMDL, Final for the Androscoggin River.

- c. Source Description: The Rumford Point wastewater treatment facility receives sanitary wastewater flows from 12-15 residential users in the Rumford Point area within the District's boundaries. The facility does not receive industrial flows and is not authorized to receive septage. The collection system is a 100% separated sewer system with no known combined sewer overflow (CSO) points. All flow into the treatment facility is by gravity and there are no pump stations.
- d. Wastewater Treatment: The Rumford Point wastewater treatment facility provides a secondary level of treatment via a package treatment plant system that includes a bar rack, an aeration basin with diffused aeration, one secondary clarifier, and a chlorine contact tank. The facility has been authorized to discontinue chlorination between October 1 and May 14 of each year. Waste sludge is removed to a holding tank then transported to the District's other treatment plant located in Mexico where it is utilized in the sludge compost process.

Final effluent is conveyed for discharge to the Androscoggin River via a 6-inch diameter outfall pipe that terminates on the shore of the river.

3. CONDITIONS OF PERMITS

Maine law, 38 M.R.S.A. §414-A, requires that the effluent limitations prescribed for discharges, including, but not limited to, effluent toxicity, require application of best practicable treatment (BPT), be consistent with U.S. Clean Water Act, and ensure that the receiving waters attain the State water quality standards as described in Maine's Surface Water Classification System. In addition, Maine law, 38 M.R.S.A. §420, and Department rule 06-096 CMR Chapter 530.5, *Surface Water Toxics Control Program*, require the regulation of toxic substances at the levels set forth for Federal Water Quality Criteria as published by the U.S. Environmental Protection Agency pursuant to the Clean Waters Act.

4. RECEIVING WATER QUALITY STANDARDS

Maine law, 38 M.R.S.A., §467(1)(A)(2) classifies the Androscoggin River at the point of discharge as a Class C waterway. Maine law, 38 M.R.S.A., §465(4), describes the standards for Class C waters.

5. RECEIVING WATER QUALITY CONDITIONS

The State of Maine 2004 Integrated Water Quality Monitoring and Assessment Report, prepared pursuant to Sections 303(d) and 305(b) of the Federal Water Pollution Control Act, lists a 11.0-mile reach of the Androscoggin River, main stem, from Rumford Point to Virginia Bridge (Hydrologic Unit Code #ME0104000204/Waterbody ID #421R), which includes the receiving water at the point of discharge, as, “*Category 4-B-1: Rivers and Streams Impaired by Pollutants, Pollution Control Requirements Reasonably Expected to Result in Attainment.*” Impairment in this context refers to a statewide fish consumption advisory due to the presence of dioxin.

In addition, the Report lists all freshwaters in Maine as “*Category 5-C: Waters Impaired by Atmospheric Deposition.*” Impairment in this context refers to the designated use of recreational fishing due to elevated levels of mercury in some fish caused by atmospheric deposition. As a result, the State has established a fish consumption advisory for all freshwaters in Maine. Pursuant to Maine law, 38 M.R.S.A. §420(1-B)(B), “*a facility is not in violation of the ambient criteria for mercury if the facility is in compliance with an interim discharge limit established by the Department pursuant to section 413 subsection 11.*” The Department has established interim monthly average and daily maximum mercury concentration limits for this facility.

In addition, the Report identifies a 4.0-mile reach of the Androscoggin River, main stem, four miles upstream of the Gulf Island Dam (HUC #ME0104000208/Waterbody ID #424R) as, “*Category 5-A: Rivers and Streams Impaired by Pollutants Other Than Those Listed in 5-B Through 5-D (TMDL Required).*” Impairment in this context refers to dissolved oxygen criteria for Class C waters, which is discussed further in the following paragraphs.

Current Water Quality Assessment/Modeling

Two segments of the Androscoggin River are on Maine’s 303d list as bodies of water that do not attain Class C water quality standards. According to the total maximum daily load (TMDL) entitled, *Androscoggin River Total Maximum Daily Load Gulf Island Pond, Livermore Falls Impoundment*, prepared by the Department, Gulf Island Pond (GIP) does not attain Class C minimum and monthly average dissolved oxygen (DO) criteria in a four-mile segment directly above Gulf Island Dam, primarily in deeper areas of the water column from 30 to 80 feet of depth. In addition, algae blooms occur from excessive amounts of phosphorus discharged to the river flowing into the pond preventing attainment of the designated uses of water contact recreation. In addition to GIP, the Livermore Falls impoundment just below the International Paper (IP) mill does not attain Class C aquatic life criteria, as indicated by recent water quality evaluations utilizing macro-invertebrate sampling and the use of a linear discriminate modeling.

5. RECEIVING WATER QUALITY CONDITIONS (cont'd)

The pollutants of concern are carbonaceous biochemical oxygen demand (CBOD), orthophosphate (ortho-P), total phosphorus (total-P), and total suspended solids (TSS). Reduction of phosphorus is needed to eliminate algae blooms in Gulf Island Pond.

Reduction of CBOD, TSS, and phosphorus is needed to improve DO levels to attainment of Class C criteria. In addition, an in-stream oxygen injection system currently located five miles above Gulf Island Dam needs to be re-designed to inject an additional quantity of oxygen into the pond.

Discharges from paper mills located in Berlin, New Hampshire, Rumford, Maine, and Jay, Maine are the major sources of most of the pollutants affecting GIP water quality. Municipal point sources are located in Berlin, New Hampshire, Gorham, New Hampshire, Bethel, Maine, Rumford-Mexico, Maine, and Livermore Falls, Maine.

TSS and algae contribute to sediment oxygen demand (SOD), a major source of oxygen depletion in the deeper areas of Gulf Island Pond. The Department investigated the importance of SOD, oxygen injection, and paper mill BOD input levels on dissolved oxygen levels and summarized the findings in a report entitled, *Androscoggin River Modeling Report and Alternative Analysis, June 2002*. Sediment oxygen demand was found to be the most important factor since the model prediction of DO changed the most within given percentages of change for SOD. Varying oxygen injection rates resulted in the second largest response to model prediction of DO and the amounts input for the paper mill BOD inputs resulted in the lowest response of the model DO. This is a useful exercise in showing that reducing pollutants that contribute to SOD (algae, TSS) and oxygen injection are more efficient remediation actions than reducing paper mill BOD. TSS is the major cause of non-attainment of Class C aquatic life criteria in the Livermore Falls impoundment.

Component analysis and river modeling indicate that the municipal sources of total-P and ortho-P from the Berlin, Gorham, Bethel and Rumford-Mexico POTWs have a *de-minimis* contribution to algae growth in Gulf Island Pond.

The component analysis of phosphorus loads discharged in 2004 (Figure 10 of the TMDL) indicates that paper mills are still the largest source of phosphorus and account for about 70% of the total-P and 80% of the ortho-P entering the pond. International Paper is the largest single source accounting for 45% of the total-P and 57% of the ortho-P entering the pond. The Rumford Paper Company is the second largest single source of phosphorus, accounting for about 14% of the total-P and 21% of the ortho-P entering the pond. The Fraser Paper mill in Berlin, New Hampshire accounts for about 11% of the total-P entering the pond, but only 2% of the ortho-P entering the pond. All of the municipal discharges are an insignificant percentage of the total phosphorus entering the pond.

5. RECEIVING WATER QUALITY CONDITIONS (cont'd)

The rapid loss of ortho-P in the 2004 ambient data in the river from Berlin, New Hampshire to Jay, Maine implies a high ortho-P assimilation rate. The ortho-P appears to remain nearly constant from Jay to Turner, Maine implying a low ortho-P assimilation rate. The difference is likely because the Androscoggin River is shallower and more free-flowing from Berlin to Jay as opposed to below Jay, which is impounded and deep. Shallower water is more suited to growth of bottom-attached plants which uptake ortho-P. The Department's experience modeling ortho-P uptake in other rivers indicates that as ortho-P concentrations increase, the rate of assimilation of ortho-P also increases.

The threshold for phosphorus in the TMDL is to maintain the pond averaged chlorophyll-a to under 10 parts per billion (ppb). There are different combinations of total-P and ortho-P that could result in obtaining this goal.

Gulf Island Dam contributes to non-attainment of DO criteria and the growth of algae blooms by creating an environment of low water movement and low vertical mixing within the water column. Modeling also indicates that the presence of the dam accounts for about 20% of the algae levels in Gulf Island Pond with the TMDL implemented. Non-attainment of Class C DO criteria in deeper portions of the pond is predicted by the water quality model, even if point source discharges are eliminated, due to sediment oxygen demand from natural and non-point sources of pollution. There are limited opportunities for the control of significant amounts of non-point source pollution given the relatively undeveloped nature of this large watershed.

Based on a review of available effluent data and Department best professional judgment, the Department concludes that the District's Rumford Point Facility accounts for insignificant pollutant loadings to the Gulf Island Pond entrance and does not cause or contribute to non-attainment of the standards of classification for Class C waters. However, this permitting action is establishing a requirement to monitor and report effluent total phosphorus and orthophosphate levels during the warm season (June 1 through September 30) of calendar year 2005. The Department reserves the right to reopen this permit at any time, with notice to the permittee, to modify the monitoring requirements and/or establish effluent limits for phosphorus as necessary to protect receiving water quality.

6. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS

- a. Flow: The previous permitting action established a monthly average discharge flow limit of 0.019 million gallons per day (MGD) based on the design capacity of the treatment facility, and a daily maximum discharge flow reporting requirement, which are being carried forward in this permitting action. This permitting action is also carrying forward the continuous recorder monitoring requirement for discharge flow.

6. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS (cont'd)

- b. Dilution Factors: Dilution factors associated with the discharge from the Rumford Point facility were derived in accordance with freshwater protocols established in Department Regulation Chapter 530.5, *Surface Water Toxics Control Program*, October 1994. With a monthly average treatment plant design flow of 0.019 MGD, dilution calculations are as follows:

$$\text{Acute: } 1Q10 = 1,663 \text{ cfs} \quad \Rightarrow \frac{(1,663 \text{ cfs})(0.6464) + 0.019 \text{ MGD}}{0.019 \text{ MGD}} = 56,578:1$$

$$\text{Modified Acute: } \frac{1}{4} 1Q10 = 416 \text{ cfs} \quad \Rightarrow \frac{(416 \text{ cfs})(0.6464) + 0.019 \text{ MGD}}{0.019 \text{ MGD}} = 14,154:1$$

$$\text{Chronic: } 7Q10 = 1,663 \text{ cfs} \quad \Rightarrow \frac{(1,663 \text{ cfs})(0.6464) + 0.019 \text{ MGD}}{0.019 \text{ MGD}} = 56,578:1$$

$$\text{Harmonic Mean} = 2,795 \text{ cfs} \quad \Rightarrow \frac{(2,795 \text{ cfs})(0.6464) + 0.019 \text{ MGD}}{0.019 \text{ MGD}} = 95,094:1$$

Department rule Chapter 530.5 states:

Analysis using numerical acute criteria for aquatic life must be based on 1/4 of the 1Q10 stream design flow to prevent substantial acute toxicity within any mixing zone, according to EPA's Mixing Zone Policy and to ensure a Zone of Passage of at least 3/4 of the cross-sectional area of any stream as required by Department rule. Where it can be demonstrated that a discharge achieves complete and rapid mixing with the receiving water, by way of an efficient diffuser or other effective method, analyses may use a greater proportion of the stream design flow, up to and including all of it, as long as the required Zone of Passage is maintained.

The outfall pipe associated with the discharge from the District's Rumford Point Facility terminates on the shoreline of the Androscoggin River. Therefore, this permitting action is utilizing the default stream flow of 1/4 1Q10 in acute evaluations in accordance with Chapter 530.5.

- c. Biochemical Oxygen Demand (BOD₅) and Total Suspended Solids (TSS): The previous permitting action established monthly average and weekly average BOD₅ & TSS concentration limits of 30 mg/L and 45 mg/L, respectively, which were based on secondary treatment requirements of the Clean Water Act of 1977 §301(b)(1)(B) as defined in 40 CFR 133.102 and Department rule 06-096 CMR Chapter 525(3)(III). The previous permitting action also established daily maximum BOD₅ & TSS concentration limits of 50 mg/L based on a Department best professional judgment (BPJ) of best practicable treatment (BPT). All three technology-based concentration limits are being carried forward in this permitting action.

6. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS (cont'd)

Department rule 06-096 CMR Chapter 523(6)(f) states that all pollutants limited in permits shall have limitations, standards or prohibitions expressed in terms of mass. The previous permitting action established monthly average, weekly average and daily maximum technology-based mass limits of 4.8 lbs./day, 7.1 lbs./day, and 7.9 lbs./day, respectively, for BOD₅ & TSS, which are being carried forward in this permitting action and were derived as follows:

Monthly Average Mass Limit: $(30 \text{ mg/L})(8.34 \text{ lbs./gallon})(0.019 \text{ MGD}) = 4.8 \text{ lbs./day}$

Weekly Average Mass Limit: $(45 \text{ mg/L})(8.34 \text{ lbs./gallon})(0.019 \text{ MGD}) = 7.1 \text{ lbs./day}$

Daily Maximum Mass Limit: $(50 \text{ mg/L})(8.34 \text{ lbs./gallon})(0.019 \text{ MGD}) = 7.9 \text{ lbs./day}$

The previous permitting action established, and this permitting action is carrying forward, a requirement for a minimum of 85% removal of BOD₅ & TSS pursuant to Department rule 06-096 CMR Chapter 525(3)(III)(a)(3) and (b)(3).

This permitting action is carrying forward the minimum monitoring frequency requirement of twice per month (2/Month) based on Department guidance for POTWs permitted to discharge up to 0.1 MGD.

- d. Settleable Solids: The previous permitting action established a daily maximum technology-based concentration limit of 0.3 ml/L for settleable solids and a minimum monitoring frequency requirement of five times per week (5/Week), which are being carried forward in this permitting action. The daily maximum concentration limit of 0.3 ml/L is based on a Department BPJ determination that this limit provides sufficient information to assess whether the treatment facility is providing BPT. The minimum monitoring frequency requirement of 5/Week is less frequent than Department guidance and is based on a Department best professional judgment determination of the minimum level of monitoring necessary to assess compliance with this limit in consideration of the District's compliance record for this parameter and the size of the treatment facility.
- e. Escherichia coli: The previous permitting action established, and this permitting action is carrying forward, seasonal (May 15 – September 30) monthly average and daily maximum concentration limits for *E. coli* bacteria of 142 colonies/100 ml (geometric mean) and 949 colonies/100 ml (instantaneous level), respectively, which were based on the State of Maine Water Classification Program criteria for Class C waters found at 38 M.R.S.A. §465(4)(B), and a minimum monitoring frequency requirement of twice per month (2/Month) based on Department guidance for POTWs permitted to discharge up to 0.1 MGD. Although *E. coli* bacteria limits are seasonal and apply between May 15 and September 30 of each year, the Department reserves the right to impose year-round bacteria limits if deemed necessary to protect the health, safety and welfare of the public.

6. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS (cont'd)

- f. Total Residual Chlorine (TRC): The previous permitting action established a daily maximum technology-based concentration limit of 1.0 mg/L for TRC and a minimum monitoring frequency requirement of five times per week. Limitations on TRC are specified to ensure that ambient water quality standards are maintained and that BPT technology is being applied to the discharge. Department licensing/permitting actions impose the more stringent of either a water quality-based or BPT based limit. End-of-pipe acute and chronic water quality based concentration thresholds may be calculated as follows:

Acute (A) Criterion	Chronic (C) Criterion	Modified A & C Dilution Factors	Calculated	
			Acute Threshold	Chronic Threshold
0.019 mg/L	0.011 mg/L	14,154:1 (Mod. A) 56,578:1 (C)	269 mg/L	622 mg/L

The Department has established a daily maximum BPT limitation of 1.0 mg/L for facilities that disinfect their effluent with elemental chlorine or chlorine-based compounds. The BPT-based limit of 1.0 mg/L is more stringent than the calculated acute water quality-based threshold of 269 mg/L and is therefore being carried forward in this permitting action. This permitting action is carrying forward the minimum monitoring frequency five times per week (5/Week), which is less frequent than Department guidance, based on a Department best professional judgment determination of the minimum level of monitoring necessary to assess compliance with this limit in consideration of the District's compliance record for this parameter and the size of the treatment facility. TRC monitoring must be performed during any period in which chlorine-based compounds are in for effluent disinfection. For instances when chlorine-based compounds are not used for disinfection during an entire reporting period, the facility shall report "NODI-9" for this parameter on the monthly Discharge Monitoring Report (DMR).

- g. Total Phosphorus (Total-P) and Orthophosphate (Ortho-P): The previous permitting action did not establish phosphorus effluent limitations or monitoring requirements. In order to assist the Department in evaluating water quality impacts caused by municipal dischargers on the upper portion of the Androscoggin River, this permitting action is establishing monthly average concentration and mass reporting requirements for total phosphorus (total-P) and orthophosphate (ortho-P) during the warm season (June 1 – September 30) of calendar year 2006 only, and a minimum monitoring frequency requirement of once per month (1/Month). Following completion of calendar year 2006 effluent monitoring for phosphorus, the Department will evaluate the data and determine if numeric effluent limits or additional monitoring is required to protect receiving water quality. The Department reserves the right to reopen this permit at any time, with notice to the permittee, to establish effluent limitation or additional monitoring requirement as necessary to insure the discharge does not cause or contribute to non-attainment of the water quality standards for Class C waters. Total P and ortho-P sampling and analysis shall be performed in accordance with Attachments A and B of this permit, respectively, unless otherwise specified by the Department.

6. EFFLUENT LIMITATIONS & MONITORING REQUIREMENTS (cont'd)

- h. pH: The previous permitting action established a pH range limitation of 6.0 – 9.0 standard units based on Department rule found at Chapter 525(3)(III)(c), which is being carried forward in this permitting action. This permitting actions also carrying forward the minimum monitoring frequency requirement of once per day (1/Day) based on Department guidance for POTWs permitted to discharge between 1.5 and 5.0 MGD.
- i. Whole Effluent Toxicity (WET) and Chemical Specific Testing: Maine law, 38 M.R.S.A., §414-A and §420, prohibit the discharge of effluents containing substances in amounts that would cause the surface waters of the State to contain toxic substances above levels set forth in Federal Water Quality Criteria as established by the USEPA. Department rule, 06-096 CMR Chapter 530.5, *Surface Water Toxics Control Program* (toxics rule), set forth ambient water quality criteria (AWQC) for toxic pollutants and procedures necessary to control levels of toxic pollutants in surface waters. The previous permitting action specified that the District's Rumford Point Facility qualified for exemption from toxics testing pursuant to Department rule Chapter 530.5 and did not establish WET or chemical-specific testing.

Chapter 530.5(B)(7) specifies the criteria for exemption of certain municipal, commercial and domestic discharges from toxics testing as follows:

- i. *Discharges from schools;*
- ii. *Discharges from facilities licensed to discharge less than 50,000 gallons per day of domestic wastewater, provided no holding tank wastes containing chemicals are accepted by the facility.*
- iii. *Discharges from publicly owned treatment works which are not classified by USEPA as major and which discharge to receiving waters with a dilution ratio of at least 1000:1, provided that the POTW receives no process wastes from sources for which pretreatment standards have been promulgated by the USEPA; and*
- iv. *Discharges from combined sewer overflow discharge points, provided the owner of the sewerage system is conducting or participating in a pollution abatement program.*

Based on these criteria and a permitted flow limit of 0.019 MGD (19,000 gallons per day), the Department concludes that the District qualifies for exemption from Chapter 530.5 testing requirements and this permitting action is not establishing WET or chemical-specific testing requirements. It is noted that the Department reserves the right to reopen this permit at any time, with notice to the permittee, to impose WET and chemical-specific testing, based on changes to the applicability or exemption criteria of Chapter 530.5 and/or to protect water quality from the discharge of toxic pollutants in toxic amounts.

7. DISCHARGE IMPACT ON RECEIVING WATER QUALITY

As permitted, the Department has determined the existing water uses will be maintained and protected and the discharge will not cause or contribute to the failure of the waterbody to meet standards for Class C classification.

8. PUBLIC COMMENTS

Public notice of this application was made in the *Rumford Falls Times* newspaper on or about March 30, 2005. The Department receives public comments on an application until the date a final agency action is taken on the application. Those persons receiving copies of draft permits shall have at least 30 days in which to submit comments on the draft or to request a public hearing, pursuant to Chapter 522 of the Department's rules.

9. DEPARTMENT CONTACTS

Additional information concerning this permitting action may be obtained from and written comments should be sent to:

William Hinkel
Division of Water Resource Regulation
Bureau of Land and Water Quality
Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017 Telephone (207) 287-7659

10. RESPONSE TO COMMENTS

During the period of May 13, 2005 through June 13, 2005, the Department solicited comments on the proposed draft Maine Pollutant Discharge Elimination System Permit to be issued to the District. No significant comments were received during the public comment period; therefore, a response to comments was not prepared.