

September 14, 2020

Project 171.05027.008

Electronic Mail to Board Service List Only  
Presiding Officer Duchesne and Board Members  
Maine Board of Environmental Protection  
17 State House Station  
28 Tyson Drive  
Augusta, Maine 04333-0017

RE: Comments on the Department's Draft Maine Pollution Discharge Elimination System Permit (MEPDES) and Waste Discharge License ME 0002771/W009200-6F-A-N dated August 13, 2020

Dear Presiding Officer Duchesne and Board of Environmental Protection:

On August 13, 2020, the Board of Environmental Protection (BEP) released a Maine Department of Environmental Protection (MEDEP) Staff Recommendation/Draft Board Order (Draft Waste Discharge License ME 0002771/W009200-6F-A-N) regarding Nordic Aquafarms MEPDES Application. The recommendation is in the form of a Draft Waste Discharge License. Provided in this letter are comments on the Draft Waste Discharge License ("Department Draft MEPDES").

**1. SPECIAL CONDITIONS A - EFFLUENT CONDITIONS AND MONITORING REQUIREMENTS**

Nordic notes that the allowed nitrogen under the Department Draft MEPDES (1,348 lbs/day as shown on page 5) is lower than was indicated in the application materials, and that the allowed nitrogen has been calculated based on antidegradation criteria as shown on page 26 of the Department Draft MEPDES Fact Sheet. Nordic accepts this reduction and is confident that it can meet this requirement given its robust and state of the art wastewater treatment technology.

**2. FACT SHEET - APPLICATION SUMMARY**

Nordic notes a typographic error toward the end of the last paragraph on page 4 of the Fact Sheet, "quite title action" should read "quiet title action".

**3. FACT SHEET – APPLICATION SUMMARY**

Nordic notes that the percentage reductions on page 6 of the Fact Sheet are reversed. Nitrogen should read 85% and Phosphorus should read 99%.

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Maine Board of Environmental Protection

We appreciate the hard work that the BEP and MEDEP has put into preparing these findings.

Thank you,

RANSOM CONSULTING, LLC

Elizabeth M. Ransom, P.G.  
Principal/Senior Geologist

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