



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

July 29, 2015

Mr. John P. Bohenko, City Manager
Office of City Manager
Portsmouth City Hall
1 Junkins Avenue
Portsmouth, New Hampshire 03801

Dear Mr. Bohenko,

I am writing this letter to follow up on EPA's letter to you dated July 31, 2012 regarding EPA's progress in drafting the National Pollutant Discharge Elimination System (NPDES) permit for Portsmouth's Peirce Island treatment plant.

In the July 31, 2012 letter, EPA stated that it was our intention to public notice the draft permit for Portsmouth by the end of the summer of 2012. However, in the course of developing the permit, it came to our attention that the City would be requesting a flow increase for this permit reissuance which required the New Hampshire Department of Environmental Services (NHDES) to conduct an antidegradation review. EPA decided not to move forward with the public notice until this review was completed and the results incorporated into the draft permit. As you know, this review involved four rounds of effluent and receiving water sampling and resulted in an antidegradation letter which NHDES sent to you on November 14, 2013. The draft NPDES permit for Portsmouth was then updated to include the results of the antidegradation study. At that time the City of Portsmouth informed EPA that the City was considering a regional option for wastewater treatment at Pease International Tradeport in lieu of the upgrade to the Peirce Island facility. Hence, EPA again delayed moving forward with the draft permit to allow the City ample time to focus on resolving this decision. Now that we are confident that the Peirce Island facility will continue to be operational and require a plant upgrade, EPA is again preparing to move forward with the public notice and expects this to happen by the end of the 2015 calendar year.

Regarding the total nitrogen limit, EPA's letter from July 31, 2012 also stated that EPA expected to include a total nitrogen limit of 8 mg/l in the draft permit. At this time, EPA still expects that the draft permit will include a monthly average total nitrogen limit of 8 mg/l.

If you have any questions, please contact me at (617) 918-1791 or Dan Arsenault at (617) 918-1562.

Sincerely,

A handwritten signature in dark ink, appearing to read "David M. Webster".

David M. Webster
Water Permit Branch Chief

Cc: Stergios Spanos, NHDES Permits & Compliance
Suzanne Woodland, City of Portsmouth Attorney
Terry Desmarais, City of Portsmouth Engineer