**IN THE MATTER OF**

| | | | |
|---|---|---|---|
| ISF TRADING COMPANY | | ) | MAINE POLLUTANT DISCHARGE |
| LUBEC, WASHINGTON COUNTY, ME | | ) | ELIMINATION SYSTEM PERMIT |
| SEA CUCUMBER PROCESSING (0.008 MGD) | | ) | AND |
| #ME0110281 | | ) | WASTE DISCHARGE LICENSE |
| #W008161-5P-C-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 ISF TRADING COMPANY (hereinafter ISF), with its supportive data, agency review comments, and other related materials on file and FINDS THE FOLLOWING FACTS:

## APPLICATION SUMMARY

The applicant has applied to the Department for renewal of Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0110281 and Waste Discharge License (WDL) #W-008161-5P-A-N for the discharge of up to 8,000 gallons per day (GPD) of treated process wastewater, cooking water, and facility clean up water from a sea cucumber processing facility to the Lubec Narrows, Class SB, in Lubec, Maine. The MEPDES Permit / Maine WDL was issued on October 16, 2003 for a five-year term to Taka International Corporation and subsequently transferred on May 16, 2005 to ISF Trading Company.

**PERMIT SUMMARY**

**This permitting action is similar to the October 16, 2003 MEPDES Permit / Maine WDL in that it is carrying forward the:**

1. requirement that wastewater discharges only occur between one hour after mean high tide and three hours after mean high tide;
2. monthly average discharge flow reporting requirement and daily maximum limit of 8,000 GPD;
3. monthly average and daily maximum biochemical oxygen demand ($BOD_5$) reporting requirements for concentration in pounds per ½ ton of production (lbs/½TPR) and mg/L and for mass in pounds per day;
4. monthly average and daily maximum National Effluent Guidelines (NEG) based concentration limits in lbs/½TPR and monthly average mass limits in lbs/day for total suspended solids (TSS) and oil and grease (O&G) and concentration reporting requirements for both parameters in mg/L;
5. monthly average and daily maximum reporting requirements for sea cucumber production in pounds per day;
6. pH range limitation of 6.0 to 9.0 standard units;
7. previously established minimum monitoring frequency and sample typed requirements;
8. requirement to discharge all cooking water and facility clean-up water with 8,000 gallons of process water to provide maximum dilution of the waste-streams before being discharged;
9. requirements to notify the Department of changes in the influent wastewater-stream;
10. requirements to maintain a current Operations and Maintenance Plan for the facility; and
11. requirements to complete and submit supplemental monitoring forms.

**This permitting action is different from the October 16, 2003 MEPDES Permit / Maine WDL in that it is:**

1. eliminating the two-tiered approach for effluent limitations and monitoring requirements and establishing consistent limits and requirements for all production levels, labeled as Outfall #001A;
2. revising daily maximum NEG based mass limits for TSS and O&G;
3. eliminating effluent limits and monitoring requirements for total residual chlorine as the permittee no longer uses chlorine based compounds; and
4. eliminating record keeping requirements for facility cleaning and sanitizing compounds as the permittee no longer uses chemicals for such purposes.

## CONCLUSIONS

BASED on the findings in the attached Fact Sheet dated October 28, 2008, and revised November 26, 2008, 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 MRSA Section 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 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.

**ACTION**

THEREFORE, the Department APPROVES the above noted application of the ISF TRADING COMPANY to discharge a daily maximum of 8,000 GPD of treated sea cucumber processing wastewater, cooking water, and facility clean up water to the tidewaters of Lubec Narrows, Class SB, Lubec, Maine SUBJECT TO THE FOLLOWING 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. This permit expires five (5) years from the date of the signature below.

DONE AND DATED AT AUGUSTA, MAINE, THIS 1st DAY OF December, 2008.
DEPARTMENT OF ENVIRONMENTAL PROTECTION

BY:_____
David P. Littell, Commissioner

PLEASE NOTE ATTACHED SHEET FOR GUIDANCE ON APPEAL PROCEDURES

Date of initial receipt of application September 5, 2008
Date of application acceptance September 8, 2008

Date filed with Board of Environmental Protection _____

This Order prepared by Robert D. Stratton, Bureau of Land and Water Quality
#W-0081615PC / #ME0110281 November 26, 2008

## SPECIAL CONDITIONS
## A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. The permittee is authorized to discharge treated **sea cucumber processing and facility cleanup wastewater** to the tidewaters of the Lubec Narrows, Class SB, in Lubec, Maine from **OUTFALL #001A <u>between one hour after mean high tide and three hours after mean high tide</u>[1].** Such discharges shall be limited and monitored by the permittee as specified below:

| **Effluent Characteristic** | **Discharge Limitations** | | | | **Minimum Monitoring Requirement** | |
|---|---|---|---|---|---|---|
| | Monthly Average | Daily Maximum | Monthly Average | Daily Maximum | Measurement Frequency | Sample Type |
| | Units as specified | | Units as specified | | | |
| Flow *[50050]* | Report GPD *[07]* | 8,000 GPD *[07]* | --- | --- | 1/Day *[01/01]* | Measure *[MS]* |
| $BOD_5$ *[00140]* | Report lbs/ ½ $TPR^2$ *[45]* | Report lbs/ ½ $TPR^2$ *[45]* | Report mg/L *[19]* | Report mg/L *[19]* | 1 per 5 Days of Discharging[3] *[01/05]* | Composite[4] *[24]* |
| $BOD_5$ *[00310]* | Report lbs/day *[26]* | Report lbs/day *[26]* | --- | --- | 1 per 5 Days of Discharging[3] *[01/05]* | Composite[4] *[24]* |
| TSS *[00141]* | 14 lbs/ ½ $TPR^2$ *[45]* | 26 lbs/ ½ $TPR^2$ *[45]* | Report mg/L *[19]* | Report mg/L *[19]* | 1 per 5 Days of Discharging[3] *[01/05]* | Composite[4] *[24]* |
| TSS *[00530]* | 210 lbs/day *[26]* | 390 lbs/day *[26]* | --- | --- | 1 per 5 Days of Discharging[3] *[01/05]* | Composite[4] *[24]* |
| Oil & Grease *[00152]* | 1.3 lbs/ ½ $TPR^2$ *[45]* | 2.1 lbs/ ½ $TPR^2$ *[45]* | Report mg/L *[19]* | Report mg/L *[19]* | 1 per 5 Days of Discharging[3] *[01/05]* | Grab *[GR]* |
| Oil & Grease *[00552]* | 19.5 lbs/day *[26]* | 31.5 lbs/day *[26]* | --- | --- | 1 per 5 Days of Discharging[3] *[01/05]* | Grab *[GR]* |
| Production[5] *[00145]* | Report lbs/day *[26]* | Report lbs/day *[26]* | --- | --- | 1/Day *[01/01]* | Measure *[MS]* |
| pH (Std. Units) *[00400]* | The pH shall not be less than 6.0 or greater than 9.0 at any time. | | | | 1 per 5 Days of Discharging[3] *[01/05]* | Grab *[GR]* |

The italicized numeric values bracketed in the table above and on the following pages are code numbers that Department personnel utilize to code the monthly Discharge Monitoring Reports (DMRs). Footnotes are included on Pages 6 and 7

## SPECIAL CONDITIONS

### A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS, FOOTNOTES

**Sampling** for all parameters shall be collected at a sample point after the roto-sieve. All sampling shall be conducted following all means of wastewater treatment and shall be representative of what is actually discharged to the receiving waters. Any change in sampling procedures or location must be reviewed and 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 Health and Human Services. Samples that are sent to a POTW licensed pursuant to *Waste discharge licenses*, 38 M.R.S.A. § 413 are subject to the provisions and restrictions of *Maine Comprehensive and Limited Environmental Laboratory Certification Rules*, 10-144 CMR 263 (last amended February 13, 2000).

All detectable analytical test results shall be reported to the Department including results which are detected below the respective reporting limits (RLs) specified by the Department or as specified by other approved test methods. If a non-detect analytical test result is below the respective RL, the concentration result shall be reported as <Y where Y is the detection limit achieved by the laboratory for each respective parameter. Reporting a value of <Y that is greater than an established RL is not acceptable and will be rejected by the Department. For mass, if the analytical result is reported as <Y or if a detectable result is less than a RL, report a <X lbs/day, where X is the parameter specific limitation established in the permit.

1. **Operational Discharge Requirements -** The discharge of wastewater shall only occur between one (1) hour after mean high tide and three (3) hours after mean high tide. The time of mean high tide, mean low tide, start of discharge, completion of discharge, and gallons of wastewater discharged shall be recorded on Supplemental Form B (Permit Attachment A). The permittee shall submit completed copies of Supplemental Form B with the monthly DMR. See Special Condition F, Monitoring and Reporting, of this permit. The permittee shall also maintain completed copies of Supplemental Form B on premises, available to Department personnel at all times during normal working hours, for a period of at least three (3) years.

   **All cook water and clean up water must be discharged with 8,000 gallons of process water to provide maximum dilution of the waste-streams before being discharged.**

2. **Lbs / ½ TPR** – Pounds of pollutant per one-half ton of sea cucumber production per day. See Footnote 5

## SPECIAL CONDITIONS

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

FOOTNOTES

3. **Once per 5 Days of Discharging -** Sampling shall be conducted at a minimum frequency of one sample for each five days of processing / discharging. Sampling shall be conducted on periods of less than five days of processing / discharging as necessary to complete and start monitoring periods within calendar months.

4. **Composite Samples** – The permittee shall collect a minimum of three samples per sampling event, collected at time intervals spaced evenly throughout the discharge period, and shall composite all samples collected for analysis. The samples shall be representative of the effluent discharge and the samples shall be combined proportional to the flow over the processing time period or a sample shall be continuously collected proportional to the discharge flow over the discharge time period.

5. **Production** – Production refers to the pounds of sea cucumbers processed during the day, based on the form as they are delivered to the processing facility. Sea cucumbers that are frozen or shipped from the plant in the same form that they are delivered to the plant, without being processed, are not included in the pounds per day of sea cucumbers processed. Production shall be monitored daily when processing and reported on Supplemental Monitoring Form A (Permit Attachment A). The permittee shall submit completed copies of Supplemental Form A with the monthly DMR. See Special Condition F, Monitoring and Reporting, of this permit. The permittee shall also maintain completed copies of Supplemental Form A on premises, available to Department personnel at all times during normal working hours, for a period of at least three (3) years.

### 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 usage 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 usage 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.

## SPECIAL CONDITIONS

### C. UNAUTHORIZED DISCHARGES

The permittee is authorized to discharge only in accordance with: 1) the permittee's General Application for Waste Discharge Permit, accepted for processing on September 8, 2008; 2) the terms and conditions of this permit; and 3) from Outfall #001A. Discharges of wastewater from any other point source(s) are not authorized under this permit, and shall be reported in accordance with Standard Condition B(5), *Bypasses*, of this permit.

### D. NOTIFICATION REQUIREMENT

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

1. Any substantial change in the volume or character of pollutants being introduced into the wastewater collection and treatment system.
2. For the purpose of this section, notice regarding substantial change shall include information on:
   a. The quality or quantity of wastewater introduced to the wastewater collection and treatment system; and
   b. Any anticipated impact of the change in the quality or quantity of the wastewater to be discharged from the treatment system.

### E. OPERATIONS AND MAINTENANCE PLAN

This facility shall have a current written comprehensive Operation & Maintenance (O&M) Plan. 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 EPA 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.

## SPECIAL CONDITIONS

## F. 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 a Department Regional Office such that the DMRs 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 Department assigned compliance inspector (unless otherwise specified) at the following address:

Maine Department of Environmental Protection
Bureau of Land & Water Quality
Eastern Maine Regional Office
106 Hogan Road
Bangor, Maine 04401

**Completed copies of Supplemental Monitoring Forms A and B shall be submitted monthly with the DMR. Copies shall also be kept on site for a minimum of three years and shall be available to Department staff during normal working hours.**

## G. 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 including, but not limited to, new information from ambient water quality studies of the receiving waters.

## H. 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 aspects as if such unlawful provision, or part thereof, had been omitted, unless otherwise ordered by the court.

# ATTACHMENT A

## *SUPPLEMENTAL MONITORING FORMS*

Note: Forms A and B are required to be completed and submitted monthly per Permit Special Condition F and Footnotes 1 and 5.

**Supplemental Monitoring Form A** (One copy to be submitted monthly with the DMR and one copy to be maintained on site for a minimum of three years)[1,2,3,4]

**ISF Trading, Inc., Lubec** Month _____ Year _____

| DATE | FLOW | $BOD_5$ | | | TSS | | | O&G | | | Production |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | (GPD) | (mg/L) | (lbs/day) | (lbs/ ½ TPR) | (mg/L) | (lbs/day) | (lbs/ ½ TPR) | (mg/L) | (lbs/day) | (lbs/ ½TPR) | (lbs/day) |
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| **AVE.** | | | | | | | | | | | |

[1] Record production and flow daily. [2] Production in pounds per day. (The weight of live product as delivered to the plant for processing. Product delivered to the plant and frozen or shipped whole is not included in the days production.). [3] lbs/day = concentration x 8.34 x flow (mg). [4] lbs / ½ TPR = lbs/day ÷ production lbs/1000.

Signature _____ Date _____

**Supplemental Monitoring Form B** One copy to be submitted monthly with the DMR and one copy to be maintained on site for a minimum of three years. Two sets of columns for discharge and tidal information are provided for those days in which there are two high tides, making a second discharge possible.

**ISF Trading, Inc., Lubec** Month _____ Year _____

| Date | Discharge #1 | | #1 Time of mean tide | | #1 Gallons discharged | Discharge #2 | | #2 Time of mean tide | | #2 Gallons discharged | Total Gallons discharged |
|---|---|---|---|---|---|---|---|---|---|---|---|
| | **Start time**[1,2] | **End time**[1,2] | **High** | **Low** | | **Start time**[1,2] | **End time**[1,2] | **High** | **Low** | | |
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| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | **TOTAL:** | |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | **AVG.:** | |

[1] Record daily when discharging. [2] Record in "24 hour time" or "military" time, the time of the tides from tide tables adjusted for the area.

Signature _____

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

# FACT SHEET

Date: October 28, 2008
Revised: November 26, 2008

MEPDES PERMIT NUMBER: **#ME0110281**

MAINE WDL NUMBER: **#W-008161-5P-C-R**

NAME AND ADDRESS OF APPLICANT:

**Mr. Atchan Tamaki**
**ISF Trading Co., Inc.**
**Hobson's Wharf, P.O. Box 772**
**Portland, Maine**
**04104**

COUNTY: WASHINGTON

NAME AND ADDRESS WHERE DISCHARGE OCCURS:

**ISF Trading Co., Inc.**
**72 Water Street**
**Lubec, Maine**
**04652**

RECEIVING WATER/CLASSIFICATION: **Lubec Narrows, Class SB**

COGNIZANT OFFICIAL AND TELEPHONE NUMBER: **Mr. Atchan Tamaki**
**(207) 879-1575**
**atchan_tamaki26@yahoo.com**

## 1. APPLICATION SUMMARY:

Application: The applicant has applied to the Department for renewal of Maine Pollutant Discharge Elimination System (MEPDES) permit #ME0110281 and Waste Discharge License (WDL) #W-008161-5P-A-N for the discharge of up to 8,000 gallons per day (GPD) of treated process wastewater, cooking water, and facility clean up water from a sea cucumber processing facility to the Lubec Narrows, Class SB, in Lubec, Maine. The MEPDES Permit / Maine WDL was issued on October 16, 2003 for a five-year term to Taka International Corporation and subsequently transferred on May 16, 2005 to ISF Trading Company.

## 2. PERMIT SUMMARY

a. Regulatory: On January 12, 2001, the Department received authorization from the U.S. Environmental Protection Agency (USEPA) to administer the National Pollutant Discharge Elimination System (NPDES) permit program in Maine, excluding areas of special interest to Maine Indian Tribes. On October 30, 2003, after consultation with the U.S. Department of Justice, USEPA extended Maine's NPDES program delegation to all but tribally owned discharges. That decision was subsequently appealed. On August 8, 2007, a panel of the U.S. First Circuit Court of Appeals ruled that Maine's environmental regulatory jurisdiction applies uniformly throughout the State. From January 12, 2001 forward, the program has been referred to as the MEPDES program and MEPDES Permit numbers, such as #ME0110281 for ISF Trading Company, utilized as the primary reference number for facilities.

b. Terms and Conditions: This permitting action is similar to the October 16, 2003 MEPDES Permit / Maine WDL in that it is carrying forward:

1. requirement that wastewater discharges only occur between one hour after mean high tide and three hours after mean high tide;
2. monthly average discharge flow reporting requirement and daily maximum limit of 8,000 GPD;
3. monthly average and daily maximum biochemical oxygen demand ($BOD_5$) reporting requirements for concentration in pounds per ½ ton of production (lbs/½TPR) and mg/L and for mass in pounds per day;
4. monthly average and daily maximum National Effluent Guidelines (NEG) based concentration limits in lbs/½TPR and monthly average mass limits in lbs/day for total suspended solids (TSS) and oil and grease (O&G) and concentration reporting requirements for both parameters in mg/L;
5. monthly average and daily maximum reporting requirements for sea cucumber production in pounds per day;
6. pH range limitation of 6.0 to 9.0 standard units;
7. previously established minimum monitoring frequency and sample typed requirements;
8. requirement to discharge all cooking water and facility clean-up water with 8,000 gallons of process water to provide maximum dilution of the waste-streams before being discharged;
9. requirements to notify the Department of changes in the influent wastewater-stream;
10. requirements to maintain a current Operations and Maintenance Plan for the facility; and
11. requirements to complete and submit supplemental monitoring forms.

## 2. PERMIT SUMMARY (cont'd)

This permitting action is different from the October 16, 2003 MEPDES Permit / Maine WDL in that it is:

1. eliminating the two-tiered approach for effluent limitations and monitoring requirements and establishing consistent limits and requirements for all production levels, labeled as Outfall #001A;
2. revising daily maximum NEG based mass limits for TSS and O&G;
3. eliminating effluent limits and monitoring requirements for total residual chlorine as the permittee no longer uses chlorine based compounds; and
4. eliminating record keeping requirements for facility cleaning and sanitizing compounds as the permittee no longer uses chemicals for such purposes.

c. History: The most recent relevant regulatory actions involving the facility in which ISF Trading Company is located include the following:

April 11, 1995 – A WDL renewal #W-000793 was issued to Nordic Delight Foods d/b/a R. J. Peacock Canning Company for the discharge of up to 20,000 gallons per day of process water from salmonid processing and sea urchin packing at the facility. The license expired on April 11, 2000.

January 21, 2003 – The WDL (#W-000793) issued to Nordic Delight Foods d/b/a R. J. Peacock Canning Company on April 11, 1995 was retired.

January 22, 2003 – The NPDES permit (#ME0000523) issued to R. J. Peacock Canning Company on August 7, 1980 was retired.

October 16, 2003 – The Department issued MEPDES Permit #ME0110281 / Maine WDL #W-008161-5P-A-N to Taka International Corporation for the discharge of up to 8,000 GPD of treated process wastewater and facility clean up water from a sea cucumber processing facility to the Lubec Narrows in Lubec, Maine. The Permit was issued for a five-year term.

May 16, 2005 – The Department issued MEPDES Permit #ME0110281 / Maine WDL #W-008161-5P-B-T, transferring the October 16, 2003 MEPDES Permit / Maine WDL issued to Taka International Corporation to ISF Trading Company. The term of the permit remained unchanged.

September, 5, 2008 – ISF Trading Company submitted a timely application for renewal of its MEPDES Permit / WDL. The application was assigned MEPDES Permit #ME0110281 / WDL #W-008161-5P-C-R.

## 2. PERMIT SUMMARY (cont'd)

d. Source Description: The ISF Trading Company processes sea cucumbers in the former R. J. Peacock Canning Company facility in Lubec. Historically, the facility has been used for canning sardines, as well as processing various other fish, including farm raised Atlantic salmon. Most recently, the facility was used by Taka International Corporation for processing sea cucumbers.

Wastewater at ISF is generated during the processing of sea cucumbers and from cleaning the equipment and facility. During the processing of the sea cucumbers, the ends of the raw sea cucumbers are cut off, the carcasses split, entrails removed and the muscle scraped from the skin. The muscle is then washed, drained of water, vacuum packed, and frozen. The skins are boiled and dried. ISF reports processing an average of 15,000 pounds of sea cucumbers per day, a maximum of 30,000 lbs/day, and an annual total production of approximately 2.7 million pounds during a 36-week processing season from October through June.

The sea cucumber ends and entrails are sent to a compost facility.

e. Wastewater Treatment: ISF reports generating and discharging an average of 4,000 GPD of processing wastewater and a maximum of 8,000 GPD. All processing wastewater flows to an approximately 500-gallon capacity sump. The wastewater is then pumped to two 5,984-gallon concrete tanks and subsequently pumped to a rotoscreen with an efficiency equivalent to that of a number 30 standard sieve. Wastewater is then discharged to the Lubec Narrows. The wastewater discharge is regulated manually to discharge through a 12-inch outfall pipe which is located in a depth of 6 feet at mean low water. The wastewater discharge is tidally timed to only occur between one hour after mean high tide and three hours after mean high tide to ensure that wastewater is distributed during an outgoing tidal phase.

All sanitary wastewaters are sent to the Lubec Publicly Operated Treatment Works (POTW).

## 3. CONDITIONS OF PERMITS:

Maine law, 38 M.R.S.A. Section 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 the 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, 38 M.R.S.A., Section 420 and Department rule 06-096 CMR Chapter 530, *Surface Water Toxics Control Program*, require the regulation of toxic substances not to exceed levels set forth in Department rule 06-096 CMR Chapter 584, *Surface Water Quality Criteria for Toxic Pollutants*, and that ensure safe levels for the discharge of toxic pollutants such that existing and designated uses of surface waters are maintained and protected.

## 4. RECEIVING WATER QUALITY STANDARDS:

Maine law, 38 M.R.S.A., Section 469 indicates that the tidal water of Lubec Narrows is classified as a Class SB water. Maine law, 38 M.R.S.A., Section 465-B(2) describes the classification standards for Class SB waters.

## 5. RECEIVING WATER QUALITY CONDITIONS:

The State of Maine 2008 *Integrated Water Quality Monitoring and Assessment Report* (DEPLW0817), prepared pursuant to Sections 303(d) and 305(b) of the Federal Water Pollution Control Act includes the receiving water in the designation *Lubec and South Lubec* (Waterbody IDs 701-8 and 708-6, DMR Area 58) in Category 5-B-1, Estuarine and Marine Waters Impaired only by Bacteria (TMDL Required). The two Waterbody IDs refer to a 487-acre (0.76 sq.mi.) segment of Class SB water and a 70-acre (0.11 sq.mi.) segment of Class SB water respectively, with the source of impairment for both listed as "*OBDs; Elevated fecals; Nonpoint Source*" and the last year sampled listed as "*current*".

The Maine Department of Marine Resources (MeDMR) assesses information on shellfish growing areas to ensure that shellfish harvested are safe for consumption. The MeDMR has authority to close shellfish harvesting areas wherever there is a pollution source, a potential pollution threat, or poor water quality. The MeDMR traditionally closes shellfish harvesting areas if there are known sources of discharges with unacceptable bacteria levels (in-stream thresholds established in the National Shellfish Sanitation Program) or maintains shellfish harvesting closure areas due to lack of updated information regarding ambient water quality conditions. In addition, the MeDMR prohibits shellfish harvesting in the immediate vicinity of all wastewater treatment outfall pipes as a precautionary measure in the event of a failure in the treatment plant's disinfection system. Pursuant to MeDMR Regulation 95.09 O (A), Closed Area No. 58, Lubec and South Lubec, amended on August 4, 2006, (in part) "*Effective immediately, because of pollution, it shall be unlawful to dig, take or possess any clams, quahogs, oysters or mussels taken from the shores, flats and waters of the Town of Lubec, enclosed by a line beginning at the northern tip of Diamond Point; then northeast to the northern tip of Popes Folly; then east to the Canadian-US Boundary; then follows the boundary south to a point east from Mowry Point; then west to the southern tip of Mowry Point."* (see Fact Sheet Attachment A).

Sanitary wastewater from the ISF facility is sent to the Lubec wastewater treatment facility. The Department has no information that the ISF facility, as permitted herein, causes or contributes to non-attainment conditions in the receiving water. If it is determined in the future that the ISF facility causes or contributes to non-attainment conditions in the receiving water, this permitting action may be reopened pursuant to Permit Special Condition G and effluent limitations, monitoring and operational requirements, and/or wastewater treatment requirements adjusted accordingly.

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS:

Pursuant to Maine Law (38 M.R.S.A., §414-A.1), the Department shall only authorize discharges to Maine waters when those discharges, either by themselves or in combination with other discharges, "*will not lower the quality of any classified body of water below such classification". Further, "the discharge will be subject to effluent limitations that require application of the best practicable treatment". "Best practicable treatment* (BPT) *means the methods of reduction, treatment, control and handling of pollutants, including process methods, and the application of best conventional pollutant control technology or best available technology economically available, for a category or class of discharge sources that the department determines are best calculated to protect and improve the quality of the receiving water and that are consistent with the requirements of the Federal Water Pollution Control Act" (40 CFR). "If no applicable standards exist for a specific activity or discharge, the department must establish limits on a case-by-case basis using best professional judgement…*" (BPJ) considering "*…the existing state of technology, the effectiveness of the available alternatives for control of the type of discharge and the economic feasibility of such alternatives…*". Pursuant to 38 M.R.S.A, §414-A.1 and §464.4, the Department regulates wastewater discharges through establishment of effluent limitations and monitoring requirements that are protective of Maine waters.

The Code of Federal Regulations Title 40, Part 408 references standards for canned and preserved seafood processing, but not for sea cucumber processing. Therefore, using best professional judgement (BPJ), the Department established Total Suspended Solids (TSS) and Oil and Grease (O&G) license limits in WDLs for sea cucumber processing facilities based on 40 CFR subpart AG – Abalone Processing Subcategory § 408.335, beginning in 1996. Those limits have been the effluent standards for sea cucumber licenses/permits issued since and are being carried forward and/or revised in this permit as described below.

The previous permitting action contained two effluent limitation pages, one for processing 2,000 pounds per day or less of sea cucumbers and one for processing more than 2,000 pounds per day of sea cucumbers, with only mass limits established for the smaller processing volumes based on lower expected treatment efficiencies. This permitting action is eliminating the two-tiered production-based system for effluent limits and monitoring requirements in favor of a single set of standards for all production levels, as the facility does not typically process less than 2,000 pounds of sea cucumbers per day. ISF only reported one day of processing less than 2,000 pounds of sea cucumbers during the five-year term of the previous permitting action.

In the application submitted to the Department, ISF reports a maximum discharge flow of 8,000 gallons per day (GPD) and processing figures of an average of 15,000 pounds of sea cucumbers per day, a maximum of 30,000 lbs/day, and an annual total production of approximately 2.7 million pounds during a 36-week processing season from October through June.

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

a. Flow: The previous permitting action established a monthly average reporting requirement and a daily maximum discharge flow limit of 8,000 gallons per day for each of the two production-based effluent limit scenarios described above. This permitting action carries forward both the reporting requirement and the 8,000 GPD daily maximum limit for all levels of production. Monitoring is required at a frequency of once each day that wastewater is discharged, consistent with the previous permitting action requirements.

A review of the Discharge Monitoring Report (DMR) data for ISF for the period of May 2005 through May 2008 indicates the following:

**FLOW**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Daily Max | 8,000 GPD | 480 GPD | 2,070 GPD | 1,206 GPD | 19 |

b. Dilution Factors: Department Regulation Chapter 530 *Surface Water Toxics Control Program*, §4(a)(2) states:

(1) *For estuaries where tidal flow is dominant and marine discharges, dilution factors are calculated as follows. These methods may be supplemented with additional information such as current studies or dye studies.*

*(a) For discharges to the ocean, dilution must be calculated as near-field or initial dilution, or that dilution available as the effluent plume rises from the point of discharge to its trapping level, at mean low water level and slack tide for the acute exposure analysis, and at mean tide for the chronic exposure analysis using appropriate models determined by the Department such as MERGE, CORMIX or another predictive model.*

*(b) For discharges to estuaries, dilution must be calculated using a method such as MERGE, CORMIX or another predictive model determined by the Department to be appropriate for the site conditions.*

*(c) In the case of discharges to estuaries where tidal flow is dominant and marine waters, the human health criteria must be analyzed using a dilution equal to three times the chronic dilution factor.*

Using plan and profile information provided by the permittee, the Department has determined that the acute dilution factor for the discharge of 8,000 gallons per day from ISF is 10:1 in the receiving water. However, by limiting the discharge to between one hour after mean high tide and three hours after mean high tide, which is a condition of this permit (Permit Section A), the acute dilution increases to 202:1 in the receiving water.

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

c. Biochemical Oxygen Demand ($BOD_5$): The previous permitting action established monthly average and daily maximum $BOD_5$ reporting requirements for concentration in pounds per ½ ton of production and mg/L and for mass in pounds per day for each of the two production-based effluent limit scenarios described above. Effluent limits were not established for $BOD_5$ as the 40 CFR subpart AG – Abalone Processing Subcategory § 408.335 does not contain limits for $BOD_5$. The reporting requirements are being carried forward in this permitting action at a minimum frequency of one sample for each five days of processing / discharging, as outlined in Permit Special Condition A, Footnote 3.

A review of the DMR data for ISF for the period of January 2006 through May 2008 indicates the following:

**BOD MASS**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | Report lb / ½ TPR | 0.05 lb / ½ TPR | 2.1 lb / ½ TPR | 0.60 lb / ½ TPR | 17 |
| Daily Max | Report lb / ½ TPR | 0.05 lb / ½ TPR | 2.1 lb / ½ TPR | 0.63 lb / ½ TPR | 17 |
| Monthly Avg | Report lb/day | 1.5 lb/day | 20.2 lb/day | 9.24 lb/day | 17 |
| Daily Max | Report lb/day | 1.5 lb/day | 20.2 lb/day | 9.41 lb/day | 17 |

**BOD CONCENTRATION**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | Report mg/L | 200 mg/L | 3,100 mg/L | 1,164 mg/L | 17 |
| Daily Max | Report mg/L | 200 mg/L | 3,100 mg/L | 1,182 mg/L | 17 |

d. Total Suspended Solids (TSS): The previous permitting action established different requirements for the two production-based effluent limit scenarios described above. When processing greater than 2,000 pounds of sea cucumbers per day, limits of 14 pounds per half ton of production (lb/½ TPR) (monthly average) and 26 lbs/½ TPR (daily maximum) were established, based on the 40 CFR subpart AG – Abalone Processing Subcategory § 408.335 NEGs. TSS mass limits of 210 lbs/day (monthly average) and 780 lbs/day (daily maximum) were established based on the NEG limits and daily production figures provided by the permittee of an average of 15,000 pounds and a maximum of 30,000 lbs. When processing 2,000 lbs or less of sea cucumbers per day, the previous permitting action established TSS reporting requirement in lbs/½ TPR and TSS mass limits of 28 lbs/day (monthly average) and 52 lbs/day (daily maximum). The mass limits were established based on the NEG limits described above and a production value of 2,000 lbs/day. At all levels of production, the permit required reporting of TSS effluent concentrations in mg/L. It is noted that the daily maximum mass limit for production greater than 2,000 lbs/day was incorrectly calculated by using the daily maximum production figure. Pursuant to USEPA guidance for development of NEG based limits, average production is to be used for derivation of both average and maximum limits.

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

This permitting action establishes one set of TSS effluent limits for all levels of facility production. It carries forward the monthly average and daily maximum lb/½ TPR limits from the NEGs as well as the monthly average and daily maximum mg/L reporting requirements. This permitting action establishes monthly average and daily maximum lbs/day mass limits based on USEPA guidance for such limits as shown below.

Monthly average effluent limitation: 14 lbs/½ TPR
Daily maximum effluent limitation: 26 lbs/½ TPR
Average daily production is 15,000 lbs.

Monthly average mass limit: 15,000 lbs x 14 lbs/1,000 lbs = 210 lbs/day
Daily maximum mass limit: 15,000 lbs x 26 lbs/1,000 lbs = 390 lbs/day

The reporting requirements are being carried forward in this permitting action at a minimum frequency of one sample for each five days of processing / discharging, as outlined in Permit Special Condition A, Footnote 3.

A review of the DMR data for ISF for the period of January 2006 through May 2008 indicates the following:

**TSS MASS**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | 14 lb / ½ TPR | 0.018 lb / ½ TPR | 35.4 lb / ½ TPR | 4.06 lb / ½ TPR | 19 |
| Daily Max | 26 lb / ½ TPR | 0.018 lb / ½ TPR | 35.4 lb / ½ TPR | 4.07 lb / ½ TPR | 19 |
| Monthly Avg | 210 lbs/day | 1.6 lbs/day | 263 lbs/day | 26.2 lbs/day | 19 |
| Daily Max | 780 lbs/day | 1.6 lbs/day | 263 lbs/day | 26.6 lbs/day | 19 |

2 violations of monthly average lb/½TPR limit, 2 violations of daily maximum lb/½TPR limit; 1 violation of monthly average lb/day limit.

**TSS CONCENTRATION**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | Report mg/L | 330 mg/L | 39,000 mg/L | 3,130 mg/L | 19 |
| Daily Max | Report mg/L | 330 mg/L | 39,000 mg/L | 3,140 mg/L | 19 |

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

e. Oil & Grease (O&G): The previous permitting action established different requirements for the two production-based effluent limit scenarios described above. When processing greater than 2,000 pounds of sea cucumbers per day, limits of 1.3 pounds per half ton of production (lb/½ TPR) (monthly average) and 2.1 lbs/½ TPR (daily maximum) were established, based on the 40 CFR subpart AG – Abalone Processing Subcategory § 408.335 NEGs. O&G mass limits of 19.5 lbs/day (monthly average) and 63 lbs/day (daily maximum) were established based on the NEG limits and daily production figures provided by the permittee of an average of 15,000 pounds and a maximum of 30,000 lbs. When processing 2,000 lbs or less of sea cucumbers per day, the previous permitting action established O&G reporting requirement in lbs/½ TPR and O&G mass limits of 2.6 lbs/day (monthly average) and 4.2 lbs/day (daily maximum). The mass limits were established based on the NEG limits described above and a production value of 2,000 lbs/day. At all levels of production, the permit required reporting of O&G effluent concentrations in mg/L. It is noted that the daily maximum mass limit for production greater than 2,000 lbs/day was incorrectly calculated by using the daily maximum production figure. Pursuant to USEPA guidance for development of NEG based limits, average production is to be used for derivation of both average and maximum limits.

This permitting action establishes one set of O&G effluent limits for all levels of facility production. It carries forward the monthly average and daily maximum lb/½ TPR limits from the NEGs as well as the monthly average and daily maximum mg/L reporting requirements. This permitting action establishes monthly average and daily maximum lbs/day mass limits based on USEPA guidance for such limits as shown below.

Monthly average effluent limitation: 1.3 lbs/½ TPR
Daily maximum effluent limitation: 2.1 lbs/½ TPR
Average daily production is 15,000 lbs.

Monthly average mass limit: 15,000 lbs x 1.3 lbs/1,000 lbs = 19.5 lbs/day
Daily maximum mass limit: 15,000 lbs x 2.1 lbs/1,000 lbs = 31.5 lbs/day

The reporting requirements are being carried forward in this permitting action at a minimum frequency of one sample for each five days of processing / discharging, as outlined in Permit Special Condition A, Footnote 3.

A review of the DMR data for ISF for the period of May 2005 through May 2008 indicates the following:

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

**OIL & GREASE MASS**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | 1.3 lb / ½ TPR | 0.014 lb / ½ TPR | 14 lb / ½ TPR | 2.23 lb / ½ TPR | 19 |
| Daily Max | 2.1 lb / ½ TPR | 0.014 lb / ½ TPR | 14 lb / ½ TPR | 2.23 lb / ½ TPR | 19 |
| Monthly Avg | 19.5 lbs/day | 0.02 lbs/day | 101 lbs/day | 9.41 lbs/day | 19 |
| Daily Max | 63 lbs/day | 0.02 lbs/day | 101 lbs/day | 9.47 lbs/day | 19 |

4 violations of monthly average lb/½TPR limit, 3 violations of daily maximum lb/½TPR limit; 3 violations of monthly average lb/day limit, 1 violation of daily maximum lb/day limit.

**OIL & GREASE CONCENTRATION**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | Report mg/L | 31 mg/L | 15,000 mg/L | 1,367 mg/L | 18 |
| Daily Max | Report mg/L | 31 mg/L | 15,000 mg/L | 1,370 mg/L | 18 |

f. Production, pounds/day: The previous permitting action established monthly average and daily maximum production reporting requirements to provide a means of estimating the mass of pollutants generated and discharged over the term of the permit as well as to provide information for possible reevaluation of BPT standards in the future. These requirements are being carried forward in this permitting action. Production refers to the pounds of sea cucumbers processed during the day, based on the form as they are delivered to the processing facility. Sea cucumbers that are frozen or shipped from the plant in the same form that they are delivered to the plant, without being processed, are not included in the pounds per day of sea cucumbers processed. Production shall be monitored daily when processing and reported on Supplemental Monitoring Form A (Permit Attachment A). Further details are provided in Permit Special Condition A, footnotes.

A review of the DMR data for ISF for the period of May 2005 through May 2008 indicates the following:

**PRODUCTION**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Monthly Avg | Report lb/day | 1,410 lb/day | 23,166 lb/day | 12,765 lb/day | 19 |
| Daily Max | Report lb/day | 2,200 lb/day | 29,600 lb/day | 15,792 lb/day | 19 |

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

g. pH Limits: The previous permitting action established a pH range limit of 6 to 9 standard units based on the requirements for pH in the NEGs, 40 CFR subpart AG – Abalone Processing Subcategory §408.335. This requirement is being carried forward in this permitting action.

The reporting requirements are being carried forward in this permitting action at a minimum frequency of one sample for each five days of processing / discharging, as outlined in Permit Special Condition A, Footnote 3.

A review of the DMR data for ISF for the period of April 2006 through May 2008 indicates the following:

**pH RANGE**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Range | 6.0 – 9.0 su | 6.42 su | 7.65 su | --- | 13 |

h. Total Residual Chlorine (TRC): The previous permitting action established a daily maximum technology based TRC limit of 1.0 mg/L for the discharge based on the use of Foam Safe, a chlorine based compound, for facility clean-up. In its permit renewal application, ISF indicates that no chlorine based compounds or other chemicals are used in its processes or products and that no chemicals are used for sanitation or disinfection during production or clean-up operations. On October 27, 2008, the permittee clarified that bleach is used for facility cleaning, but that it is washed into the sanitary wastewater flow that is discharged to the Lubec POTW and that no such products are discharged to the receiving water. Therefore, this permitting action eliminates the effluent limitation and monitoring requirements for TRC. Pursuant to Permit Special Condition C, this permitting action does not authorize the discharge of any chemicals or chlorine based compounds to the receiving water.

A review of the DMR data for ISF for the previous five year period indicates the following based on TRC discharge data reported for May 2005 and June 2005:

**TRC CONCENTRATION**

| Value | Limit | Minimum | Maximum | Average | #Values |
|---|---|---|---|---|---|
| Daily Max | 1.0 mg/L | 0.05 mg/L | 0.10 mg/L | 0.075 mg/L | 2 |

i. Temperature: The Department regulation relating to tidal water thermal discharges, Chapter 582 states, "*No discharge of pollutants shall cause the monthly mean of the daily maximum ambient temperatures in any tidal body of water, as measured outside the mixing zone, to be raised more than 4 degrees Fahrenheit, nor more than 1.5 degrees Fahrenheit from June 1 to September 1. In no event shall any discharge cause the temperature of any tidal waters to exceed 85 Fahrenheit at any point outside a mixing zone established by the board*."

## 6. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (cont'd)

The facility discharges 500 gallons of sea cucumber cooking water once per day at the end of the processing day. In this permitting action, the Department requires that the 8,000 gallons of process water per day shall not be discharged until the clean up water and the cook water is discharged into the process water to provide adequate dilution of the clean up water and cook water. For temperature calculations the receiving water volume is being calculated as follows:

Assume 212ºF cook water and 45ºF process water.
500 gallons x 212ºF + 8,000 gallons x 45ºF = 8,500 gallons x "X"
"X" = 55ºF. 55 ºF-45 ºF=10ºF change prior to mixing.
With a dilution of 202:1, the post-mixing temperature change = 10ºF/202 = 0.05 ºF

The Department assumes a 45ºF water temperature for the receiving water during the month of June. Presently, the sea cucumber harvest season in Maine is closed from July 1 through September 30.

The discharge of the 500 gallons of sea cucumber cooking water will not violate the Department temperature standards if it is discharged with the processing wastewater. The capacity of the tank is 500 gallons and the maximum temperature of the discharge is 212º F. Therefore temperature monitoring is not required as the 1.5 degree temperature criterion will not be exceeded under the above discharge conditions.

## 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 the standards for Class SB classification.

## 8. TREATMENT PLANT OPERATOR:

This permitting action does not require wastewater treatment plant operator certification pursuant to Department Water Quality Rules Chapter 531. However, the Department advises the permittee that the wastewater treatment system should be operated at all times by a person(s) with sufficient knowledge and expertise in the operation of the wastewater treatment system to ensure proper functioning of the system and compliance with all licensing requirements.

## 9. PUBLIC COMMENTS:

Public notice of this application was made in the *Quoddy Tides* on or about September 4, 2008. The Department receives public comments on an application until the date a final agency action is taken on that 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 *Application Processing Procedures for Waste Discharge Licenses,* 06-096 CMR 522 (effective January 12, 2001).

## 10. DEPARTMENT CONTACTS

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

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Bureau of Land and Water Quality
Department of Environmental Protection
17 State House Station
Augusta, Maine 04333-0017

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email: Robert.D.Stratton@maine.gov

## 11. RESPONSE TO COMMENTS

During the period of October 28, 2008 through November 26, 2008, the Department solicited comments on the proposed draft Maine Pollutant Discharge Elimination System / Maine Waste Discharge License to be issued to the ISF Trading Company for the proposed discharge. The Department did not receive any comments that resulted in significant revisions to the Permit / WDL, but made some minor internal revisions. Therefore, no response to comments has been prepared.

# ATTACHMENT A

*(Facility Location Maps)*

# ATTACHMENT B

*(Facility Site Plans)*