NEXTera ENERGY SEABROOK

February 18, 2011

SBK-L-11031
Docket No. 50-443

U.S. Nuclear Regulatory Commission
Attention: Document Control Desk
One White Flint North
11555 Rockville Pike
Rockville, MD 20852

Seabrook Station
Environmental Permit Renewals
NextEra Energy Seabrook License Renewal Environmental Report

References:

1. NextEra Energy Seabrook, LLC letter SBK-L-10077, "Seabrook Station Application for Renewed Operating License," May 25, 2010. (Accession Number ML101590099)

In Reference 1, NextEra Energy Seabrook, LLC (NextEra) submitted an application for a renewed facility operating license for Seabrook Station Unit 1 in accordance with the Code of Federal Regulations, Title 10, Parts 50, 51, and 54.

As discussed with the staff and license renewal project management, NextEra Energy Seabrook actively maintains the permits listed in Appendix E Table 9.1-1 (Reference 1). Enclosed is an updated Table 9.1-1 and copies of the associated permits that have been renewed or renewal submitted since May 25, 2010.

If there are any questions or additional information is needed, please contact Mr. Richard R. Cliche, License Renewal Project Manager, at (603) 773-7003.

A035
NRR

If you have any questions regarding this correspondence, please contact Mr. Michael O'Keefe, Licensing Manager, at (603) 773-7745.

Sincerely,

NextEra Energy Seabrook, LLC.

Paul O. Freeman
Site Vice President

Enclosure

cc:

W.M. Dean	NRC Region I Administrator
G. E. Miller,	NRC Project Manager, Project Directorate I-2
W. J. Raymond,	NRC Resident Inspector
R. A. Plasse Jr.,	NRC Project Manager, License
M. Wentzel,	NRC Project Manager, License Renewal

Mr. Christopher M. Pope
Director Homeland Security and Emergency Management
New Hampshire Department of Safety
Division of Homeland Security and Emergency Management
Bureau of Emergency Management
33 Hazen Drive
Concord, NH 03305

John Giarrusso, Jr.
Nuclear Preparedness Manager
The Commonwealth of Massachusetts
Emergency Management Agency
400 Worcester Road
Framingham, MA 01702-5399

United States Nuclear Regulatory Commission
SBK-L-11031

NEXTera ENERGY SEABROOK

I, Paul O. Freeman, Site Vice President of NextEra Energy Seabrook, LLC hereby affirm that the information and statements contained within are based on facts and circumstances which are true and accurate to the best of my knowledge and belief.

Sworn and Subscribed

Before me this

18th day of February, 2011

SHIRLEY SWEENEY
MY COMMISSION EXPIRES NOV. 18, 2014
NOTARY PUBLIC
NEW HAMPSHIRE

Shirley Sweeney
Notary Public

Paul O. Freeman
Site Vice President

Enclosure to SBK-11031

Table 9.1-1: Environmental Authorizations for Current Seabrook Station Operations (as of 02/01/2011)

Permit MFD 1101: Permit to Display Finfish and Invertebrates; New Hampshire Fish and Game Department; dated January 1, 2011.

Permit No. SEA1003: Permit to Discharge; Town of Seabrook, New Hampshire; dated May 21, 2010

Delivery License Number T-NH001-L11: State of Tennessee Department of Environment and Conservation; dated January 1, 2011.

Generator Site Access Permit Number 0111000045: State of Utah; dated April 29, 2010.

Permit FP-S-103110: Virginia Department of Emergency Management, Technical Hazards Division; Application for Registration to Transport Hazardous Radioactive Materials.

NextEra Energy Seabrook, LLC to New Hampshire Department of Environmental Services, Waste Management Division, Oil Remediation & Compliance; Stage I/II Gasoline Vapor Recovery Station Notification; dated August 17, 2010

New Hampshire Department of Environmental Services to NextEra Energy Seabrook; re. Air Permit Application Completeness Determination; Facility ID 3301500047; Application 10-0220 dated February 4, 2011

Table 9.1-1 Environmental Authorizations for Current[a] Seabrook Station Operations (as of 02/01/2011)

Agency	Authority	Requirement	Number	Issue or Expiration Date	Activity Covered
Federal and State Requirements					
U.S. Nuclear Regulatory Commission	Atomic Energy Act (42 USC 2011, et seq.), 10 CFR 50.10	License to operate	NPF-86 (NRC 2008)	Issued: 03/15/1990 Expires: 3/15/2030	Operation of Seabrook Station
U.S. Environmental Protection Agency, Region 1	Clean Water Act (33 USC Section 1251 et seq.)	NPDES Permit	NH0020338 (EPA 2002a and Seabrook 2006b)	Issued: 04/01/2002 Expired: 04/01/2007 Renewal application submitted: 09/25/2006	Discharges to Atlantic Ocean from cooling tunnel
U.S. Environmental Protection Agency, Region 1	Clean Water Act (33 USC Section 1251 et seq.)	NPDES Storm Water Multi-Sector General Permit for Industrial Activities	Notice of Intent #NHR05A729 (EPA 2002b)	Issued: 9/29/2008 Expires: 9/29/2013	Storm water
U.S. Department of Transportation, Pipeline and Hazardous Materials Safety Administration	49 USC 5108, Transportation registration; 49 CFR 107, Subpart G, Hazardous material shipper/carrier registration	Hazardous Materials Certificate of Registration	061109 003 013RT (USDOT 2009)	Issued: 6/15/2009 Expires: 6/30/2012	Transportation of hazardous materials.
Town of Seabrook	Article IV of Municipal Sewer System Ordinance	Permit to Discharge	SEA1003 (Town of Seabrook 2007b and Town of Seabrook 2010)	~~Issued: 03/21/2007~~ ~~Expires: 03/20/2010~~ ~~Renewal application submitted: 01/18/2010~~ ***Issued: 05/21/2010*** ***Expires:05/20/2013***	Industrial wastewater discharge to Town's Publically Owned Treatment Works (POTW)
New Hampshire Department of Environmental Services, Waste Management Division	New Hampshire Code of Administrative Rules Env-A 1205	Certificate of Compliance	021207930308A (NHDES 2008d)	Issued: 03/20/2008 Expires:12/11/2010 ***Renewal application submitted: 08/17/2010***	Stage I/II Gasoline Vapor Recovery System
New Hampshire Department Environmental Services, Air Resources Division	Federal Clean Air Act (42 USC 7401), 40 CFR 70, and New Hampshire Code of Administrative Rules, ENV-A 610	Title V General Permit	GSP-EG-225 (NHDES 2008e)	Issued: 7/2/2008 Expires:04/30/2013	Air Emissions from Internal Combustion Emergency Generator (EG#1)

Table 9.1-1 Environmental Authorizations for Current[a] Seabrook Station Operations (Continued)

Agency	Authority	Requirement	Number	Issue or Expiration Date	Activity Covered
Federal and State Requirements					
New Hampshire Department Environmental Services, Air Resources Division	Federal Clean Air Act (42 USC 7401), 40 CFR 70, and New Hampshire RSA 125-C	Title V Operating Permit	TP-OV-017 (NHDES 2006)	Issued: 06/05/2006 Expires:06/30/2011 ***Renewal application submitted: 12/22/2010***	Air emissions from auxiliary boilers and emergency generators
New Hampshire Department of Environmental Services, Waste Management Division	New Hampshire Code of Administrative Rules, ENV-WM 300	Hazardous Waste Limited Permit	DES-HW-LP-02-09 (NHDES 2005a)	Issued: 10/09/2008 Expires: 10/09/2013	Treatment of hazardous wastewater streams
New Hampshire Department of Environmental Services, Waste Management Division	New Hampshire Code of Administrative Rules, ENV-WM-1400	Aboveground Storage Tank Registration	Facility ID# 930908A (NHDES 2008f)	Issued: 12/24/2007 Expires:none	Aboveground tanks
New Hampshire Fish and Game Department	New Hampshire RSA 214:29	Permit to Display Finfish and Invertebrates	MFD 0801 (NHDFG 2010)	~~Issued: 01/04/2010~~ ***Issued: 01/01/2011*** ~~Expires:12/31/2010~~ ***Expires:12/31/2011***	Display of finfish and invertebrates at the Science and Nature Center
Virginia Department of Emergency Management	Title 44, Code of Virginia, Chapter 3.3, Section 44-146.30	Registration to transport radioactive material	FP-S-103110 (Virginia 2008)	~~Issued: 09/17/2008~~ ~~Expires:10/31/2010~~ ***Issued: 09/27/2010*** ***Expires:10/31/2012***	Registration for transporting radioactive material in Virginia
Tennessee Department of Environment and Conservation	Tennessee Code Annotated 68-202-206	License to deliver radioactive material	T-NH001-L10 (TNDEC 2009)	~~Issued: 1/1/2010~~ ***Issued: 1/1/2011*** ~~Expires:12/31/2010~~ ***Expires:12/31/2011***	License to deliver radioactive material to processing facility in Tennessee
Utah Department of Environmental Quality	Utah Rule 313-26	Permit to deliver radioactive material	0111000045 (UTDEQ 2009)	~~Issued: 4/28/2009~~ ***Issued: 4/29/2010*** ~~Expires:4/28/2010~~ ***Expires:4/30/2011***	Permit to deliver radioactive material to disposal facility in Utah

NPDES – National Pollutant Discharge Elimination System

[a] Current through March 1, 2010.

New Hampshire
Fish and Game Department

HEADQUARTERS: 11 Hazen Drive, Concord, NH 03301-6500
(603) 271-3421
FAX (603) 271-1438

www.WildNH.com
e-mail: info@wildlife.nh.gov
TDD Access: Relay NH 1-800-735-2964

Permit No. MFD 1101
January 1, 2011

TO WHOM IT MAY CONCERN:

Under the authority contained in RSA 214:29, permission is hereby granted to **Paul Freeman**, Site Vice President, NextEra Energy Seabrook LLC, PO Box 300, Seabrook, New Hampshire to possess for educational purposes, at its Seabrook Station Science and Nature Center, species of finfish and invertebrates common to New Hampshire coastal waters.

Species will be possessed and displayed based upon their availability, as determined by their environmental consultant, based upon the availability of space within the facility, and upon compatibility with those species currently displayed at the Science and Nature Center. All laws of the State pertaining to legal lengths and/or numbers shall be adhered to, except for undersized cod and haddock or as otherwise stipulated (below). Species of regulated finfish and invertebrates included in this permit are listed below.

American lobster, *Homarus americanus*
Crab, *Carcinus* and *Cancer* species
Cod, *Gadus morhua*
Haddock, *Melanogrammus aeglefinus*

This permit is subject to the following conditions:

1) The above listed species may be collected by the company agent, **New England Aquarium Services, Inc., PO Box 2036, Scarborough, ME 02070-2036** (a properly licensed and approved marine species collector in Maine) who will collect under this scientific permit and with the approval of the State of Maine authorities.
2) A copy of this permit shall be carried by the collecting agent, New England Aquarium Services, Inc., during collection and transport of species.
3) Any American lobster possessed under the terms of this permit must be of legal size and shall not be ovigerous or v-notched. An exception to this is that one (1) sublegal sized lobster, caught in Maine and transported to Seabrook Station Science and Nature Center by Richard Oellers of New England Aquarium Service Inc., may be possessed. Following their use as display specimens, this sublegal sized lobster may be released into New Hampshire waters. Legal sized lobsters shall not exceed three (one of which that is atypically colored).

4) The permittee shall furnish the Executive Director, by January 31, 2012 with a written report containing the number and species taken and possessed and the disposition of any possessed species.

This permit shall expire December 31, 2011 unless sooner revoked or rescinded.

Glenn Normandeau
Executive Director

cc: Sandy Falicon, Rules Coordinator
Marine Fisheries Division
Law Enforcement
Lt. Jeffrey Marston

REGION 1
629B Main Street
Lancaster, NH 03584-3612
(603) 788-3164
FAX (603) 788-4823
email: reg1@wildlife.nh.gov

REGION 2
PO Box 417
New Hampton, NH 03256
(603) 744-5470
FAX (603) 744-6302
email: reg2@wildlife.nh.gov

REGION 3
225 Main Street
Durham, NH 03824-4732
(603) 868-1095
FAX (603) 868-3305
email: reg3@wildlife.nh.gov

REGION 4
15 Ash Brook Court
Keene, NH 03431
(603) 352-9669
FAX (603) 352-8798
email: reg4@wildlife.nh.gov

TOWN OF
Seabrook, New Hampshire
99 LAFAYETTE ROAD
P.O. BOX 456 - 03874-0456
Telephone (603) 474-3311 • Fax (603) 474-8007

TOWN OF SEABROOK, NEW HAMPSHIRE
CLASS 1 INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO. SEA1003

In accordance with the provisions of Article IV of the Municipal Sewer System Ordinance for the Town of Seabrook, Rockingham County, New Hampshire (Town),

NEXT ERA ENERGY SEABROOK, LLC (SEABROOK STATION)
626 LAFAYETTE ROAD
P.O. BOX 300
SEABROOK, NEW HAMPSHIRE 03874
(603) 773-7452

(Permittee) is hereby authorized to discharge industrial wastewater from the above identified facility and through the discharge points identified herein into the Town's Publicly Owned Treatment Works (POTW) in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the Permittee of its obligation to comply with any or all applicable pretreatment regulations, standards, or requirements under local, State, and Federal laws, including any such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the Seabrook Municipal Sewer System Ordinance and shall be subject to the penalty provisions of Article X thereof.

This permit is issued in accordance with the application submitted on **January 20, 2010** and in conformity with all plans, specifications and other applicable data submitted to the Town in support of the above application.

This permit shall become effective on **May 21, 2010** and shall expire at midnight on **May 20, 2013**.

Permit Issued By:

James B. Knowles 5/24/10
Sewer Superintendent

Town of Seabrook Authorization:

5/24/2010
Town Manager

I, the undersigned, have received this Industrial Wastewater Discharge permit and understand that this document is not a contract. The terms and conditions contained herein are required by the Seabrook Municipal Sewer System Ordinance and the principles of contract law recognized by the State of New Hampshire are not applicable.

Michael O'Neil Licensing Manager
Signature/Title, Industrial User Authorized Representative

6/9/2010
Date

THIS PERMIT CONTAINS:

- Cover Page
- Discharge Limitations
- Monitoring Requirements
- Reporting Requirements
- Special Conditions
- Compliance Schedule
- Standard Conditions
- Definitions
- Fact Sheet

PART 1 - TIER 1 DISCHARGE LIMITATIONS
THESE LIMITATIONS ARE EFFECTIVE DURING NORMAL OPERATIONAL STAFFING PERIODS

A. During the effective period, the permittee is authorized to discharge wastewater to the Town of Seabrook, New Hampshire sewer system from the point(s) listed below.

Point of Discharge	Description
001	**Sanitary sewer connection discharging to the Town's sanitary sewer at manhole 135A, as designated on the Jones & Beach Engineers, Inc. drawing entitled "Figure 1".**

	Permitted Flows (GPD) by Source		Point(s)
	Daily Maximum	Monthly Average	of Discharge
OSB Photoprocessing	100	1	001
Chemistry training lab	60	2	001
Fire extinguisher testing	50	2	001
Training Annex (welding shop/ washing machine)	960	28	001
Maintenance Compressor	3	3	001
GOB Cooling Tower	1,000	500	001
Control Bldg. Condensate	90	45	001
Total Process Flow, GPD	2,263	581	001
Sanitary Flow, GPD	21,270	15,193	001
Regulated Flow, GPD	23,533 (18,000*)	15,774 (15,800*)	001

B. During the effective period, the discharge from SAN 8[(1)] shall not exceed the following pollutant limitations:

Pollutant		Limitations (milligrams per liter, except as noted)	
		Concentration Limits mg/L, Except as Noted	Mass Limits Maximum Pounds/Day
Biochemical Oxygen Demand	§,#	250	38
Oil & Grease (petroleum-based)	§,#	100	15
pH range (Standard Units)		5.0 - 11.5 SU	-
Phenols (Total) **	§	**1.0**	**0.15**
Sulfate	§,#	1,500	225
Sulfide	§,#	1.0	0.15
Sulfite	§,#	280	42
Total Suspended Solids	§,#	300	45
Acid and Base/Neutral Compounds **	#	**Screening Levels are Compound-Specific**	**Concentration Limits Apply**
Volatile Organic Compounds **	#	**Screening Levels are Compound-Specific**	**Concentration Limits Apply**
Radionuclides **	#	**Limitations are Compound-Specific**	**Concentration Limits Apply**
Arsenic **	§,◆,#	**0.010**	**0.002**
Barium	§,◆,#	0.0238	0.0036
Boron **	§,◆	**0.887**	**0.088**
Cadmium	§,◆,#	0.0009	0.0001
Chromium (total)	§,◆,#	0.007	0.0011
Copper **	§,◆	**0.126**	**0.019**
Cyanide, Total **	§,◆	**0.012**	**0.0018**
Lead **	§,◆	**0.032**	**0.005**
Mercury	§,◆,#	0.0002	0.00003
Molybdenum **		**0.0050**	**0.0008**
Nickel **	§,◆,#	**0.022**	**0.003**
Selenium	§,◆,#	0.004	0.0006
Silver	§,◆,#	0.002	0.0003
Zinc **		**0.50**	**0.08**

§ Screening levels * 7-day moving average - shall be used as the basis for flow compliance evaluations and reporting

**** Self-monitoring reports are required for these parameters. See Part 2 (A), Page 5 of the permit.**

# Indicates that the permittee is not known to be discharging these pollutants at greater than background concentrations. Approval of the Town is required to discharge these or any other pollutants not previously reported.

◆ *Indicates that limits are adjusted to account for domestic flow present at the monitoring point (i.e., at the regulated discharge point). Refer to Fact Sheet for derivation of specific limit.*

(1) SAN 8 refers to the private Sanitary Lift Station located within the power plant grounds which serves as the terminal collection point for all wastewater directed to the POTW from the power plant complex.

Mass limits: Are calculated using the daily maximum permitted process flow (18,000 GPD) and the pollutant concentration limits.

PART 1 - TIER 2 DISCHARGE LIMITATIONS
THESE LIMITATIONS ARE EFFECTIVE DURING EXTENDED STAFFING PLANT OUTAGE PERIODS

A. During the effective period, the permittee is authorized to discharge wastewater to the Town of Seabrook, New Hampshire sewer system from the point(s) listed below.

Point of Discharge	Description
001	**Sanitary sewer connection discharging to the Town's sanitary sewer at manhole 135A as designated on the Junes & Beach Engineers, Inc. drawing entitled "Figure 1".**

	Permitted Flows (GPD) by Source		Point(s)
	Daily Maximum	Monthly Average	of Discharge
OSB Photoprocessing	100	1	001
Chemistry training lab	60	2	001
Fire extinguisher testing	50	2	001
Training Annex (welding shop/washing machine)	960	28	001
Maintenance Compressor	3	3	001
GOB Cooling Tower	1,000	500	001
Control Bldg. Condensate	90	45	001
Total Process Flow, GPD	2,263	581	001
Sanitary Flow, GPD	50,000	50,000	001
Regulated Flow, GPD	52,263	50,581	001

B. During the effective period, the discharge from SAN 8[(1)] shall not exceed the following pollutant limitations:

Pollutant		Limitations (milligrams per liter, except as noted)	
		Concentration Limits mg/L, Except as Noted	Mass Limits Maximum Pounds/Day
Biochemical Oxygen Demand	§,#	250	109
Oil & Grease (petroleum-based)	§,#	100	44
pH range (Standard Units)		5.0 - 11.5 SU	-
Phenols (Total) *	§	1.0	0.44
Sulfate	§,#	1,500	654
Sulfide	§,#	1.0	0.44
Sulfite	§,#	280	122
Total Suspended Solids	§,#	300	131
Acid and Base/Neutral Compounds **		**Screening Levels are Compound-Specific**	**Concentration Limits Apply**
Volatile Organic Compounds **		**Screening Levels are Compound-Specific**	**Concentration Limits Apply**
Radionuclides **		**Limitations are Compound-Specific**	**Concentration Limits Apply**
Arsenic **	§,❖	0.010	0.004
Barium	§,❖,#	0.0233	0.0102
Boron **	§,❖	0.422	0.18
Cadmium	§,❖,#	0.0006	0.0003
Chromium (total)	§,❖,#	0.006	0.0026
Copper **	§,❖	0.105	0.046
Cyanide, Total **	§,❖	0.006	0.0026
Lead **	§,❖	0.017	0.007
Mercury	§,❖,#	0.0002	0.00009
Molybdenum **		0.005	0.0022
Nickel **	§,❖	0.015	0.007
Selenium	§,❖,#	0.004	0.0017
Silver	§,❖,#	0.001	0.0004
Zinc **		0.30	0.13

§ Screening levels

** **Self-monitoring reports are required for these parameters. See Part 2 (A), Page 5 of the permit.**

# Indicates that the permittee is not known to be discharging these pollutants at greater than background concentrations. Approval of the Town is required to discharge these or any other pollutants not previously reported.

❖ *Indicates that limits are adjusted to account for domestic flow present at the monitoring point (i.e., at the regulated discharge point). Refer to Fact Sheet for derivation of specific limit.*

(1) SAN 8 refers to the private Sanitary Lift Station located within the power plant grounds which serves as the terminal collection point for all wastewater directed to the POTW from the power plant complex.

Mass limits: Are calculated using the daily maximum permitted process flow (52,263 GPD) and the pollutant concentration limits.

C. **General Prohibitions** - An Industrial User shall not introduce into the POTW any pollutants that cause pass through or interference.

D. **Specific Prohibitions** - During the effective period of this permit, the Permittee is authorized to discharge process wastewater to the POTW from the points identified in Part 1(A) whose effluent characteristics shall not exceed the values listed in Part 1(B).

The Permittee shall comply with all prohibited discharge restrictions of the Seabrook Municipal Sewer System Ordinance and with all Federal, State, and local pretreatment standards and requirements. These shall include but not be limited to the following:

1. Any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquid, gas or solid, or any substance that can generate or form any flammable, explosive, or combustible substance, fluid, gas, vapor, or mixture when combined with air, water, or other substances present in sewers. This includes, but is not limited to, any pollutant that could cause an exceedance of ten percent (10%) of the lower explosive limit (LEL) at any point in the POTW, and any waste stream with a closed cup flashpoint of less than 140 degrees Fahrenheit using the test method specified in 40 CFR 261.21.

2. Any water or waste having a pH lower than 5.0 or higher than 11.5, or having any other corrosive property that may be capable of causing damage or hazard to structures, equipment, and/or personnel of the POTW, or having acidity or alkalinity in such quantities that the Town believes it may cause, alone or in combination with other discharges, interference or pass through.

3. Any solid or viscous substance including water or waste containing fat, wax, grease or oil, whether emulsified or not, or containing substances that can solidify or become viscous at a temperature between 32 degrees Fahrenheit and 150 degrees Fahrenheit, in amounts that could cause obstruction to the flow in the sewers or cause other interference with the proper operation of the POTW.

4. Any water or waste containing pollutants that result in the presence of toxic gases, vapors, or fumes within the POTW in a quantity that may cause worker health or safety problems.

5. Wastewater having a temperature greater than 150 degrees Fahrenheit or heat that will inhibit biological activity in the POTW resulting in interference, but in no case that causes the temperature of the wastewater treatment plant influent to exceed 104 degrees Fahrenheit.

6. Petroleum oil, non-biodegradable oil, or products of mineral oil origin in amounts that will cause interference or pass through.

7. Any water or waste containing odor-producing substances exceeding limits that may be established by the Town.

8. Any radioactive waste or isotope of such half-life or concentration as may exceed limits established by the Town or by applicable State or Federal regulations. This prohibition excludes such quantities of any isotope as can be verifiably demonstrated to derive from the Permittee's incoming municipal potable water supply or from any person(s) at the facility who is (are) undergoing medical treatment that would result in excretion of the identified isotope in their urine or feces.

9. Any quantity of flow, concentration, or both that constitute a "slug" as defined herein.

10. Any pollutant, including oxygen-demanding pollutants (BOD, COD, etc.), or chlorine demand requirements discharged at a flow rate or pollutant concentration that, either singly or by interaction with other pollutants, could interfere with the POTW, constitute a hazard to humans or animals, create a public nuisance, exceed national categorical pretreatment standards, or cause pass through.

E. **Removed Substances** - Solids, sludges, or other pollutants removed in the course of treatment or control of wastewater shall be disposed of in accordance with Section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act, as well as in accordance with all applicable State and local requirements.

F. **Dilution Prohibited** - The Permittee shall not increase the use of process water, or in any other way attempt to dilute a discharge as a partial or complete substitute for adequate treatment to achieve compliance with a pretreatment standard or requirement.

G. **Uncontaminated Water** - No sanitary sewer shall be used to receive and convey or dispose of any storm or surface water, or any other uncontaminated or unpolluted drainage.

PART 2 - MONITORING REQUIREMENTS

A. **Scheduled Monitoring and Reporting** - Sampling and measurements as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this permit. Monitoring points shall not be changed without notification to and approval from the Superintendent. From the period beginning on the effective date of the permit, the Permittee shall collect and analyze representative samples not less frequently than indicated in the following table.

PARAMETER	FREQUENCY[1]	SAMPLE TYPE / LOCATION	REPORTS DUE[2]
Barium, cadmium, chromium, mercury, selenium, silver[5]	One-time requirement	12-hour time composite[4] / SAN8[6]	July 31, 2010
Flow [3]	Continuous	Daily running time meter totalizer readings/Facility lift station[3]	July 31, January 31
Phenols[5]	Once every 6 months	12-hour time composite[4] / SAN 8[6]	July 31, January 31
Arsenic, boron, copper, cyanide, lead, molybdenum, nickel, and zinc[5]	Once every 6 months	12-hour time composite[4] / SAN 8[6]	July 31, January 31
Gamma isotopic analysis[6] Gross beta radioactivity Tritium analysis	Once every 6 months	12-hour time composite[4] / SAN 8[6] Gross beta results reported in the form of a trend evaluation of historical gross beta data	July 31, January 31
Acid and base/neutral compounds (report up to 10 tentatively identified compounds)[5]	Once every 6 months	12-hour time composite[4] / SAN 8[6]	July 31, January 31
Volatile organic compounds (report up to 10 tentatively identified compounds)[5]	Once every 6 months	One grab[7] / SAN 8[6]	July 31, January 31

Narrative Statement	Statement identifying: Source of process wastewaters; Dates of all Tier 1 and Tier 2 staffing periods; Compliance status with applicable pretreatment standards, and if not in compliance, then Description of the additional operation and maintenance practices and/or pretreatment that are necessary; Status and results of LTPMP maintenance activities.		July 31, January 31
As required at time of permit reapplication	Once every three years	Wastewater sample representative of process discharges	60 days prior to permit expiration

NOTES:
(1) If the Permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or as specified in this permit, the results of such monitoring shall be included in the July and January reports.
(2) Reports shall cover the periods from January through June, and July through December. The required monitoring may be performed at any time during the reporting period, provided the sample is representative of the volume and pollutant characteristics of the facility's discharge.
(3) Flow monitoring will be completed by recording daily running time meter totalizer readings for the facility's lift station pumping system. Flows shall be calculated on the basis of pumping rates that are determined from biannual lift station draw-down testing.
(4) Time composite samples will be collected at intervals not exceeding 30 minutes over a 24-hour period during the Monday through Friday work week.
(5) All samples shall be collected by technically qualified personnel and analyzed by an analytical laboratory that is certified by the New Hampshire Department of Environmental Services (NHDES) and accredited by the National Environmental Laboratory Accreditation Program (NELAP) for the specific analyses performed, using approved analytical methods having practical quantitation limits not greater than the permit limitations specified herein.
(6) Minimum detectable concentration (MDC) limit for potassium-40 shall be not greater than 30 picocuries per liter. MDCs for all radionuclides shall be determined in accordance with the Multi-Agency Radiological Laboratory Protocols (MARLAP) Manual (EPA 402-B-04-001 A-C).
(7) A single grab sample shall be collected during a period representative of typical facility activities.
(8) SAN 8 refers to the private Sanitary Lift Station located within the power plant grounds which serves as the terminal collection point for all wastewater directed to the POTW from the power plant complex.
(9) Samples for gamma isotopic analysis shall be preserved using hydrochloric acid, except that a separate, unpreserved sample shall be collected for iodine-131 analysis and shall be analyzed within 14 days of sample collection.

Signatory Requirements - All reports shall be signed by an Authorized Representative as defined in the Definitions section of this permit.

Certification - Signed reports shall include the following statement: *"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to ensure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."*

B. **Monitoring Scheduling Requirements** - Monitoring performed to satisfy the first reporting requirement of a new permit shall be performed within 90 days of the effective date of the permit. Annual monitoring performed in subsequent years shall be performed within the first six months of the permit year. Compliance monitoring for renewal permits shall be performed in accordance with the previously established schedule unless the Permittee is instructed to do otherwise by the Superintendent.

C. **Resampling** - If monitoring results indicate a violation (*i.e.*, exceedance of a limit), the Town shall be notified within 24 hours of becoming aware of the violation, in accordance with Part 3 (D) of this permit. The Industrial User is required to repeat the sampling and analysis and submit the results of the repeat analysis to the Town within 30 days after becoming aware of the violation, except the resampling is not required if the industry samples at least once a month or the Town has sampled between the time when the initial sampling was performed and the time when the Industrial User

received the results of this sampling. The requirement for resampling following an exceedance of a screening level will be at the discretion of the Superintendent following verbal reporting to the Town.

D. **Effluent Monitoring Devices** - If effluent monitoring is required by this permit, then the following shall apply:

1. The appropriate devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of monitored discharges.

2. All monitoring devices and sampling stations must be approved by the Seabrook Sewer Department.

3. The devices shall be installed, calibrated, and maintained to ensure that the measurements are consistent with the accepted capability of that type of device, and the Permittee shall demonstrate the accuracy of the monitoring devices upon the request of the Seabrook Sewer Department. Calibration of all measurement and test equipment shall be performed in accordance with the equipment manufacturers' recommendations and detailed, written calibration procedures that are acceptable to the Town. These procedures shall specify the method of calibration, traceability of calibration standards, acceptable limits of uncertainty, calibration records to be maintained, and such other elements as are generally specified in nationally recognized laboratory quality system standards. Failure of any monitoring device shall be reported to the Superintendent, along with the date, time and duration of such failure.

4. The Permittee shall accept the estimates of quantities of wastewater flows and other parameters, as established by the Seabrook Sewer Department, during all periods in which required devices fail to operate properly.

E. **Sampling and Analytical Methods** - Any sampling, preservation, handling, and analytical methods used must conform to 40 CFR Part 136 and amendments thereto, unless otherwise approved by EPA, or as specified in this permit. Chain of custody shall be maintained in accordance with detailed, written standard operating procedures that are acceptable to the Town. These procedures shall require the creation of a clear and complete record of sample collection and shall ensure that secure custody of the sample is maintained and documented from the time of sample collection until acceptance of the sample by the analyzing laboratory.

F. **Additional Monitoring by the Permittee** - If sampling of any pollutant is performed more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136, then the results of this monitoring shall be included in the Permittee's effluent monitoring report or as required by the Seabrook Sewer Department.

PART 3 - REPORTING REQUIREMENTS

A. **Verbal Reporting** - Verbal notification as required in this permit shall be directed to the following unless otherwise noted in a specific section:

1. During normal business hours (7:00 AM through 3:00 PM, Monday through Friday):
   Industrial Pretreatment Manager (603) 474-8012 ext 11
   Sewer Department Office (603) 474-8030

2. At all other times, notify:
   Seabrook Police Department (603) 474-5200

B. **Written Reporting** - All written reports required by this permit shall be submitted to the Seabrook Sewer Department at the following address:

Town of Seabrook, Sewer Department
Attn: Industrial Pretreatment Manager
P.O. Box 456
Seabrook, New Hampshire 03874-0456

C. **Effluent Monitoring Reports** - Industrial Users shall submit periodic reports as required in **Part 2, Section A** - Scheduled Monitoring and Reporting. These reports may require:

1. Information indicating the nature of all pollutants in the discharge from regulated processes governed by pretreatment standards;

2. Maximum and daily flow for these process units;

3. Statements on compliance with applicable pretreatment standards on a consistent basis, and if not in compliance, what additional operation and maintenance practices and/or pretreatment are necessary; and

4. Statements identifying whether monitoring samples were obtained under Tier 1 or Tier 2 operating conditions.

The Permittee shall arrange with each approved analytical services provider to have electronic copies of all compliance monitoring data reports sent via e-mail directly to the Seabrook Sewer Department's Industrial Pretreatment Program Manager at the time of issuance by the laboratory.

D. **Violation of Effluent Limits - Reporting** - In the event that effluent monitoring indicates a violation (*i.e.*, exceedance of a limit) or an exceedance of a screening level[1], the Industrial Pretreatment Manager or the Sewer Department office shall be verbally notified within one business day of becoming aware of the violation. For violations (and screening level exceedances at the discretion of the Superintendent), a written follow-up report signed by an Authorized Representative shall be filed with the Town within five (5) days. The report shall specify:

1. Description of the noncompliance, cause of the occurrence, and it's impact on the Permittee's compliance status;

2. Anticipated time period over which the condition of noncompliance is expected to continue, or if such condition has been corrected, the duration of the period of noncompliance;

3. Steps taken by the Permittee to reduce and eliminate the noncomplying discharge; and

4. Steps taken by the Permittee to prevent recurrence of the condition of noncompliance.

[1] At the request of the Permittee, the requirement for verbal notification of concentrations of 4-methylphenol less than 0.500 mg/L is temporarily waived. This waiver may be rescinded at any time at the sole discretion of the Superintendent. In the event that the Town elects to pursue Class A biosolids designation, the Permittee will be required to take such steps as may be necessary to reduce the 4-methylphenol concentration in its wastewater discharge to a level acceptable to the Town.

E. **Spills, Potentially Harmful Discharges - Reporting** - Immediate notification by the Permittee is required upon the occurrence of an accidental discharge of substances prohibited by the Seabrook Municipal Sewer System Ordinance or any slug load that may enter the public sewer, including immediate notification of any discharge that has the potential to adversely impact the POTW.

Immediate notification by the Permittee is also required for any spill of sanitary sewage and/or industrial wastewater from production, storage, pretreatment, collection, pumping or transmission

piping or other equipment designed to carry the sewage or wastewater to the Town's wastewater treatment facility. This includes any diversion into the environment caused by leaks, overflows, equipment failures, malicious acts, or any other reason.

Immediate verbal notification shall be made to the parties identified in **Part 3, Section A** above. The notification shall include the name and telephone number of the person making the notification, the location of the discharge or spill, the date and time thereof, the type of waste (including concentration and volume), and all corrective actions taken.

If the discharge or spill occurs outside of normal business hours, immediate notification is still required. Contact the Seabrook Police Department at (603) 474-5200 and ask them to notify the wastewater plant operator on duty immediately.

The Permittee's notification in accordance with the requirements of this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.

Within four (4) calendar days following a slug load, accidental discharge or spill, the Permittee shall submit to the Seabrook Sewer Department a detailed written report signed by an Authorized Representative. The report shall specify:

1. The description and cause of the slug load, accidental discharge or spill and the impact on the Permittee's compliance status. The description shall also include the location of the slug load, discharge or spill and the type, concentration, and volume of waste;

2. The duration of the period of the slug load, discharge or spill, including the exact dates and times and, if ongoing, the time by which control of the slug load/discharge/spill and compliance is reasonably expected to occur;

3. Steps taken by the Permittee to reduce and eliminate the slug load, discharge, or spill; and

4. Steps to be taken by the Permittee to prevent recurrence of the condition of noncompliance.

F. **Operating Upset/Bypass Report** - In the event the Permittee is unable to comply with any of the conditions of this permit due to a breakdown of pretreatment facilities or emergency bypass, the Permittee shall provide an immediate verbal report to the parties identified in **Part 3, Section A**. A written follow-up report signed by an Authorized Representative shall be filed with the Seabrook Sewer Department within five (5) days. The report shall contain the same information as required for the written report in **Part 3, Section D** above.

G. **Flow Exceedance Reporting** - In the event that flow monitoring indicates a greater *daily maximum regulated flow* or *monthly average regulated flow* than that which is allowed under this permit, the Permittee shall verbally notify the Industrial Pretreatment Manager within three (3) business days of becoming aware of the exceedance. At the discretion of the Superintendent, a written follow-up report signed by an Authorized Representative shall be submitted to the Sewer Department within 14 days of the verbal notification. This report shall include the items listed in **Section D** above.

H. **Effluent Monitoring Records** - The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least three (3) years from the date of the sample measurement, report, or application.

All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities shall be retained and preserved by the Permittee until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

If samples are collected, such records shall include for each sample:

1. The date, exact place, time, and methods of sampling and/or measurement, and sample preservation techniques or procedures;

2. The name of the New Hampshire Department of Environmental Services certified analytical laboratory performing the analyses;

3. Who performed the sampling and/or measurements;

4. The date(s) analyses were performed;

5. Who performed the analyses;

6. The EPA-approved method reference number[2] for each analyte reported;

7. The full name of each analyte, including whether results are total or dissolved;

8. The results of such analyses;

9. The results of all quality control testing performed by the laboratory and a statement indicating whether the results of that quality control testing were acceptable;

10. The detection limit (or MDC for radionuclides) for each analyte reported;

11. Units in which results are expressed; and

12. A copy of the chain-of-custody forms, properly completed, which accompany all samples submitted to the laboratory.

[2] Where no EPA-approved method for a particular analyte exists, then the reference shall be to such other analytical method as may be approved by the Town.

I. **Falsifying Information** - Knowingly making any false statement on any report or other document required by this permit and/or knowingly rendering any monitoring device or method inaccurate is a crime and may result in the imposition of criminal sanctions and/or civil penalties as provided in Article X of the Seabrook Municipal Sewer System Ordinance.

J. **Duty to Provide Information** - The Permittee shall furnish to the Town within 15 days any information that the Town may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also, upon request, furnish to the Town within 15 days copies of any records required to be kept by this permit.

K. **Anticipated Noncompliance** - The Permittee shall give advance notice to the Seabrook Sewer Department of any planned changes in the permitted facility or any activity that may result in noncompliance with the requirements of this permit.

L. **Signatory Requirements** - All applications, reports, and information submitted to the Seabrook Sewer Department as a requirement of this permit shall be signed by an Authorized Representative of the Permittee as defined by the Seabrook Municipal Sewer System Ordinance.

PART 4 - SPECIAL CONDITIONS

The Permittee shall comply with the following conditions:

1. Addendum 070227 (both ref. Part 2, para.D(3) and ref. Part 2, para.(E)) remains in effect.

2. A variance to the Seabrook Municipal Sewer System Ordinance, Article II, Section 2.2(T) is herewith granted to the Permittee. This variance creates a waiver allowing connection to the Town sanitary sewer of specific floor drains located in restrooms in the office areas of the following buildings: General Office Building, Administration Building, Guard House, Maintenance Building, Operations Training Center, Visitor Center, High Rise Building, and Technical Training Center, along with the Control Room. The variance further creates a waiver for the two floor drains located beneath the safety showers in the training laboratory found in the High Rise Building. No other floor drains may be connected, directly or indirectly, to the Town sanitary sewer.

3. The intentional discharge of licensed radioactive material is not authorized by this permit. The discharge limitations provided in New Hampshire Rule He-P 4090, Table III for licensed radioactive materials, measured at the point of discharge to the POTW, shall otherwise apply.[1] Any radioactive waste or isotope detected at a level equal to or greater than one-half of the concentration values contained in He-P 4090, Table III (i.e., the screening level) shall require prompt action by the Permittee to identify, mitigate and reduce the discharge to within the specifications of the permit, except as noted in Part 1, Section D, paragraph 8 of this permit. Reporting of these occurrences shall be performed in accordance with Part 3 - Reporting Requirements.

4. Gross beta analysis shall be performed in conjunction with the semiannual gamma isotopic analysis. Results will be reported in the form of a trend evaluation of historical gross beta data. If an adverse trend is observed that cannot be explained by either known therapeutic treatments or by gamma isotopic analysis, additional specific beta emitter analysis shall be performed within 30 days. An evaluation of these trends with any specific beta emitter analysis will allow the Permittee to take appropriate actions.

5. In the event that a non-routine discharge of fire protection water (which is anticipated to contain approximately 5 parts per million of sodium hypochlorite) to Discharge Point 001 is necessary, Seabrook Station will request prior authorization (verbally) from the Industrial Pretreatment Manager.

6. Grease traps have been installed in the General Office Building and Administration Building cafeterias. Maintenance of these devices shall be performed as necessary to limit the sum of the maximum thickness of the floatable grease-bearing layer plus the maximum thickness of settled solid layer to no more than twenty-five percent (25%) of the total wetted depth of the trap. A record of such maintenance shall be maintained and shall be available to the Town upon request.

7. The Permittee shall continue its long-term preventive maintenance program (LTPMP) for that portion of the station's wastewater collection system discharging to the POTW. The LTPMP shall include the following:
   - conduct video camera inspections of all gravity sections of sewer mains such that the entire gravity portion of the Seabrook Station system is inspected every ten (10) years;
   - clean all gravity sections of sewer mains such that the entire gravity portion of the Seabrook Station system is cleaned every ten (10) years;
   - every 12 months, monitor discharge pressures* at all sanitary pump stations for minor deviations that could indicate constriction (pressure increase) or leakage (pressure decrease);

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[1] The disposal of radioactive materials into sanitary sewers is regulated by the Nuclear Regulatory Commission (NRC) at 10 CFR Part 20 and the State of New Hampshire Department of Environmental Services, Division of Public Health Services, Bureau of Radiological Health, Rules He-P 4023 and He-P 4090 (Rules).

- visually inspect manholes and surface structures such that the entire Seabrook Station system is inspected every five (5) years;
- complete scheduled sewer line maintenance and repairs;
- implement a comprehensive preventive maintenance program for lift stations and alarms, including the cleaning of all lift stations at least annually and the periodic testing of all lift station alarms to the control room.
- maintain records to document the performance of all required LTPMP activities.
  * monitoring shall be performed in a manner that is acceptable to the Town.

PART 5 - COMPLIANCE SCHEDULE

No later than fourteen (14) calendar days following the date identified in the following schedule of compliance, the Permittee shall submit either a report of progress or, in the case of specific action being required by identified dates, a written notice of compliance or noncompliance. In the last case, the notice shall include the cause of noncompliance, any remedial actions taken, and the date on which it expects to comply with the increment of progress. The Permittee shall accomplish the following tasks in the designated time period:

EVENT	NO LATER THAN
N/A	N/A

PART 6 - STANDARD CONDITIONS

A. **Severability** - The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

B. **Duty to Comply** - All discharges authorized herein shall be consistent with the terms and conditions of this permit and the Seabrook Municipal Sewer System Ordinance. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings, including civil or criminal penalties, injunctive relief, and summary abatements, as provided for in the Seabrook Municipal Sewer System Ordinance, RSA 485-A, and/or Clean Water Act.

C. **Duty to Mitigate** - The Permittee shall take all reasonable steps to minimize or correct any adverse impact to the POTW or the environment resulting from noncompliance with this permit including, but not limited to:

1. Accelerated or additional monitoring;
2. Halting or reducing production activities;
3. Providing alternate methods of treatment; and/or
4. Halting or reducing discharges.

The Permittee is responsible for all expenses incurred by the Town as the result of damage to, and/or interference with the operation of the POTW arising from a noncompliance event.

Upon reduction of efficiency of operation or loss or failure of all or part of the pretreatment facility, the Permittee shall, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the pretreatment facility is restored or an alternative method of pretreatment is provided. This requirement applies, for example, when the primary source of power of the pretreatment facility fails or is reduced. It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

D. **Permit Modification, Suspension, Revocation** - After notice and opportunity for a hearing, this permit may be modified, suspended, or revoked in whole or in part during its term for causes including, but not limited, the following:

1. To incorporate any new or revised Federal, State, or local pretreatment standards or requirements;

2. Material or substantial alterations or additions to the discharger's operation processes, or discharge volume or character, which were not considered in drafting the effective permit;

3. A change in any condition of either the Industrial User or the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge;

4. Information indicating that the permitted discharge poses a threat to the POTW, Town personnel, or the receiving waters;

5. Violation of any term or condition of the permit;

6. Misrepresentation or failure to disclose fully all relevant facts in the permit application or in any required reporting;

7. Revision of, or a grant of, variance from such categorical standards pursuant to 40 CFR 403.13;

8. To correct typographical or other errors in the permit;

9. To reflect transfer of the facility ownership and/or operation to a new owner/operator;

10. Upon request of the Permittee, provided such request does not create a violation of any applicable requirements, standards, laws, or rules and regulations;

11. Tampering with monitoring equipment;

12. Refusing to allow timely access to the facility premises and records;

13. Failure to pay fines or sewer charges;

14. Failure to meet compliance schedules; and

15. To incorporate any new or revised requirements developed by the Town as are necessary to ensure POTW compliance with it's NPDES permit and with applicable sludge management requirements promulgated by the EPA or State of New Hampshire.

The filing of a request by the Permittee for a permit modification, revocation, reissuance, termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

E. **Permit Appeals** - The Permittee may petition the Superintendent to reconsider the terms of this permit within 30 days of notice of its issuance.

This petition must be in writing; failure to submit a petition for review shall be deemed to be a waiver of the appeal. In its petition, the Permittee must indicate the permit provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to be placed in the permit.

The effectivity of this permit shall not be stayed pending a reconsideration by the Superintendent. If, after considering the petition and any arguments put forth by the Industrial Pretreatment Manager, the Superintendent determines that the requested modifications are proper, he shall remand the permit back to the Industrial Pretreatment Manager for reissuance. Those permit provisions being modified by the Industrial Pretreatment Manager shall be stayed pending reissuance.

If the Superintendent fails to act on the appeal within 30 days, the Permittee's petition for reconsideration shall be deemed to be denied. If the petition is denied by the Superintendent, the Permittee shall have 30 days to appeal to the Seabrook Board of Selectmen in accordance with Section 14.2 of the Seabrook Municipal Sewer System Ordinance.

A decision by the Board of Selectmen not to reconsider the permit shall be considered final administrative action for the purpose of judicial review. The Permittee seeking judicial review of the Board's final action must do so by filing a complaint with the Hampton District Court for Rockingham County within the State of New Hampshire.

F. **Property Rights** - The issuance of this permit does not convey any property rights of any sort, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any violation of Federal, State, or local laws or regulations.

G. **Change in Ownership** - In the event that the Permittee undergoes a major change in either ownership of its corporate voting stock or control of it's corporate stock, or ownership of the building to which this permit relates, then the permit may be reassigned or transferred if:

1. At least 30 days advance notice is provided to the Seabrook Sewer Department; and

2. The new owner(s) provides written notice that there is no immediate intent to change the facility's operations and processes, and identifies the specific date on which the transfer is to occur; and

3. The new owner(s) acknowledges full responsibility for complying with the terms of this permit.

H. **Repermitting** - If the Permittee desires to continue to discharge after the expiration of this permit, it shall reapply on the application forms then in use at least 60 days before this permit expires. Under no circumstances shall the Permittee continue to discharge without an effective permit. An expired permit will continue to be effective and enforceable until the permit is reissued if:

1. The Industrial User has submitted a complete permit application at least 60 days prior to the expiration date of the user's existing permit; and

2. The failure to reissue the permit, prior to expiration of the previous permit, is not due to any act or failure to act on the part of the Industrial User.

I. **Changes in Discharge** - Approval for modifications, additions, and/or expansions that increase the quantity and/or decrease the quality of wastewater discharged to the POTW must be requested in writing to the Town at least 60 days prior to the proposed starting date for the change. This permit may then be modified or reissued to reflect such changes. No change in the Permittee's discharge may be made unless reported to and approved by the Seabrook Sewer Department and, if required, by the State of New Hampshire Department of Environmental Services. In no case shall new connections, increased flows, or significant changes in effluent quantity and/or quality be permitted if such will cause violation of the effluent limitations or discharge prohibitions specified herein.

J. **Compliance with Applicable Pretreatment Standards and Requirements** - Compliance with this permit does not relieve the Permittee from its obligations regarding compliance with any and all applicable local, State, and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this permit.

K. **Confidential Information** - With the exception of information that has been determined by the Town to be confidential or proprietary and is identified as such in this permit, all information required for and by this permit shall be available for public inspection. This requirement supercedes any and all confidentiality agreements executed prior to the effective date of this permit.

L. **Proper Operation and Maintenance** - The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes but is not limited to: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

M. **Sewer Construction, Repair, Replacement** - The Permittee shall make application on a special *Application for Sewer Service* form furnished by the Town at least thirty (30) days prior to undertaking the installation, replacement, repair, or modification of any subsurface sewer main, pump station, or other appurtenant structure. The *Application for Sewer Service* shall be supplemented by any plans, specifications, or other information considered pertinent in the judgment of the Superintendent. An application and inspection fee shall be paid to the Town at the time the application is filed. All work must be inspected and approved by the Sewer Department prior to backfilling.

N. **Flow Measurement** - If flow measurement is required by this permit, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

O. **Bypass of Treatment Facility**

1. Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury or severe property damage and no feasible alternatives exist.

2. The Permittee may allow bypass to occur that does not cause effluent limitations to be exceeded, but only if it is for essential maintenance to assure efficient operation.

3. Notification of Bypass

   a. Anticipated bypass. If the Permittee knows in advance of the need for bypass, it shall submit prior written notice to the Sewer Department at least ten (10) working days in advance.

   b. Unanticipated bypass. The Permittee shall verbally notify the Sewer Department immediately, and shall submit a written notice within five (5) working days. The report shall specify:

      - A description of the bypass, its cause and duration;

- Whether the bypass has been corrected; and
- The steps being taken to reduce, eliminate and prevent a recurrence of the bypass.

P. **Inspection and Entry** - The Permittee shall allow authorized Town personnel, upon the presentation of credentials and other documents as may be required by law, to:

1. Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records are kept as required under the conditions of this permit;

2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

3. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit;

4. Sample or monitor, for the purposes of assuring permit compliance, any substances or parameters at any locations; and

5. Inspect any production, manufacturing, fabricating, or storage area where pollutants regulated under the permit could originate, be stored, or be discharged to the sewer system.

Q. **Civil and Criminal Liability** - Nothing in this permit shall be construed to relieve the Permittee from civil and/or criminal penalties for noncompliance under local, State, or Federal laws or regulations.

R. **Town Remedies** - The Town reserves all rights and remedies that it has under or by reason of any statutory law, ordinance, or common law to enforce any condition of this permit, including, but not limited to:

1. Civil and/or criminal penalties;
2. Recovery of expenses incurred as a result of noncompliance;
3. permit revocation;
4. Emergency Town action to halt or prevent any imminently harmful discharge;
5. Fines and/or imprisonment; and
6. Newspaper publication of significant violators.

S. **Other Requirements** - The conditions listed in this permit are not intended to be all inclusive. The Town shall be notified if questions arise regarding the Permittee's responsibilities. The Town reserves the right to make revisions to this permit in order to implement the requirements of the Seabrook Municipal Sewer System Ordinance.

PART 7 - DEFINITIONS

Act or "the Act" - The Federal Water Pollution Control Act, also known as the Clean Water Act, as amended, 33 U.S.C. § 1251 *et seq.*

Authorized Representative - An Authorized Representative shall be:

1. if the user is a corporation, then the president, vice-president, or other legally appointed officer of the corporation; or

2. if the user is a partnership or sole proprietorship, then a general partner or proprietor, respectively; or

3. if the user is a Federal, State, or local governmental facility, then a director or the highest official appointed or designated to directly oversee the operation and performance of the activities of the government facility; or

4. the individuals described in paragraphs (a) through (c), above, may designate another Authorized Representative if the authorization is in writing, the authorization specifies that the individual or position is responsible for the overall operation of the facility from which the discharge originates or has overall responsibility for environmental matters for the Permittee, and the written authorization is submitted to the Town.

5. If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for environmental matters for the company, then a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the Town prior to or together with any reports that require the signature of an Authorized Representative.

Biochemical Oxygen Demand (BOD) - The quantity of oxygen utilized in the biochemical oxidation of organic matter under standard laboratory procedures for five (5) days at 20° Centigrade, usually expressed as a concentration (e.g., mg/l), as determined by 40 CFR Part 136.

Bypass - The intentional diversion of a waste stream from any portion of a pretreatment or wastewater treatment facility.

Categorical Pretreatment Standard or Categorical Standard - Any regulation containing pollutant discharge limits promulgated by EPA in accordance with Sections 307(b) and (c) of the Act (33 U.S. C. § 1317) that apply to a specific category of users and that appear in 40 CFR Chapter I, Subchapter N, Parts 405-471.

Chain-of-Custody - A form that records the handling of samples from the time of collection to the time the samples are received by the laboratory. Information required includes date(s) and time(s) of sample collection, sampler identification, sampling location(s), the names of all individuals handling the sample, as well as dates, times, and signatures documenting the transfer of sample custody between individuals, and any other information necessary to document the validity of the sample.

Daily Maximum - The maximum allowable discharge of pollutant or flow during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of concentration, the daily maximum is the measurement of representative sample(s) obtained as specified in **Part 2, Section A** of this permit.

Environmental Protection Agency or EPA - The United States Environmental Protection Agency or, where appropriate, the Region 1 Water Management Division Director, or other duly authorized official of said agency.

Flow Recorder - Shall mean a weir, meter, flume, or other device that will measure and record the volume of wastewater discharged.

Hazardous Substance - Any substance designated under 40 CFR Part 116 pursuant to Section 311 of "the Act."

Industrial Pretreatment Manager - The person designated by the Town to administer the Industrial Pretreatment Program, and who is charged with certain duties and responsibilities, or a duly authorized representative thereof.

Industrial User - A person, business, organization or other entity that discharges industrial wastewater to the POTW.

Industrial (Process) Wastewater - The wastewater from an industrial process, trade, or business, or from the development of any natural resource, as distinct from sanitary sewage.

Interference - A discharge, which alone or in conjunction with a discharge or discharges from other sources, inhibits or disrupts the POTW, its treatment processes or operations or its sludge processes, use, or disposal; and, therefore, is a cause of a violation of the Town's NPDES permit or of the prevention of sewage sludge use or disposal in compliance with any of the following statutory/regulatory provisions or permits issued thereunder, or any more stringent State or local regulations: Section 405 of the Clean Water Act; the Solid Waste Disposal Act, including Title II commonly referred to as the Resource Conservation and Recovery Act (RCRA); any State regulation contained in any State sludge management plan prepared pursuant to Subtitle D of the Solid Waste Disposal Act; the Clean Air Act; the Toxic Substances Control Act; the Marine Protection, Research, and Sanctuaries Act; and the 40 CFR Part 503 Standards for Sewage Sludge Use and Disposal.

Lower Explosive Limit (LEL) - This refers to the lowest concentration of gas or vapor (% by volume in air) that will burn or explode if an ignition source is present and at ambient temperatures.

Method Detection Limit - The minimum concentration of a substance that can be measured and reported as defined and determined in 40 CFR, Part 136, Appendix B.

Monitoring Point - A specified site where sampling and/or monitoring takes place on a regular basis.

Monthly Average - The arithmetic mean for effluent samples collected during a calendar month or specified 30-day period.

NHDES - New Hampshire Department of Environmental Services.

NPDES - National Pollutant Discharge Elimination System; the national program for issuing and enforcing permits for the discharge of pollutants from any point source into waters of the United States, under Sections 402, 318, and 405 of the Clean Water Act.

Pass through - A condition that exists when a discharge contains substances or their reaction or degradation products that exit the POTW in quantities or concentrations that, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the Town's NPDES permit, including an increase in the magnitude or duration of a violation.

Pretreatment (Treatment, Treat) - The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to, or in lieu of discharging or otherwise, introducing such pollutants into the POTW. This reduction or alteration can be obtained by physical, chemical, or biological processes, by process changes, or by other means, except by diluting the concentration of the pollutants unless allowed by an applicable pretreatment standard.

Pretreatment Standards (Standards, Effluent Limitations) - Prohibited discharge standards, categorical pretreatment standards, local limits, and screening levels.

Priority Pollutants - A group of toxic chemicals listed by the EPA in 40 CFR Part 403, Appendix B as requiring restriction from entering municipal sewers or any receiving waters.

Prohibited Discharge Standards or Prohibited Discharges - Prohibitions against the discharge of certain substances. These prohibitions appear in Article II, Section 2.5 of the Seabrook Municipal Sewer System Ordinance and 40 CFR 403.5(b).

Publicly Owned Treatment Works (POTW) - A "treatment works", as defined in Section 212 of the Clean Water Act (33 U.S.C. §1292), that is owned by the Town. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sanitary sewage or industrial wastes of a liquid nature. It also includes sewers, pipes, and other conveyances only if these structures convey wastewater to a POTW wastewater treatment facility. The term also means the municipality that has jurisdiction over the discharges to and the discharges from such a treatment works.

Sample - Shall mean a portion of the wastewater obtained for analytical purposes. This portion may be:

1. **Composite Sample** - A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a:

   a) **Time Composite** - Composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or

   b) **Flow-Proportional Composite** - Collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between aliquots.

2. **Grab Sample** - An individual sample collected within a time interval less than 15 minutes without regard to flow or time.

Sampler - A device used with or without flow measurement to obtain a portion of water or wastewater for analytical purposes. May be designed for taking single (grab), composite samples, continuous samples, or periodic samples.

Sampling Station - A specified site where monitoring takes place on a regular basis.

Sanitary (Domestic) Sewage - Wastewater consisting solely of normal water-carried household and toilet wastes or waste (e.g., human excrement and gray water) from sanitary conveniences of residences, commercial buildings, and industrial plants, as distinct from industrial wastewater and unpolluted water.

Seabrook Municipal Sewer System Ordinance - This refers to the sewer use ordinance for the Town that is currently in effect.

Seabrook Sewer Department - Shall mean an authorized agent of the Seabrook Sewer Department established to operate and maintain the Town's Wastewater Treatment Facilities.

Shall - is mandatory; **May** - is permissive.

Significant Industrial User -

1. A user subject to categorical pretreatment standards; or

2. A user that:

   a) Discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, non-contact cooling, and boiler blowdown wastewater);

   b) Contributes a process waste stream that makes up five (5) percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment facility; or

c) Is designated as such by the Town on the basis that it has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement.

Suspended Solids (SS) - Shall mean the solids that either float on the surface of, or are in suspension in, wastewater and that are largely removable by laboratory filtering, as determined by 40 CFR part 136.

Slug Load or Slug -

1. Any discharge of water or wastewater that, in concentration of any given constituent or in quantity of flow, exceeds for any period of duration longer than 15 minutes, more than five (5) times the average 24-hour concentration or flow during normal operations.

2. Any discharge at a flow rate or concentration that could cause a violation of the prohibited discharge standards in the Seabrook Municipal Sewer System Ordinance or 40 CFR 403.5(b).

3. Any discharge that may adversely affect the collection system and/or performance of the POTW.

Slug Control Plan - A plan prepared by an Industrial User to control slug discharges. Elements of the plan include: description of discharge practices, description of stored chemicals, procedures for notifying the POTW of slug discharges, and procedures to prevent adverse impact from accidental spills.

Spill - Any intentional or unintentional diversion of sanitary sewage and/or industrial wastewater from production, storage, pretreatment, collection, pumping or transmission piping or other equipment designed to carry the sewage or wastewater to the Town's wastewater treatment facility. This includes any diversion into the environment caused by leaks, overflows, equipment failures, malicious acts, or any other reason.

Town - The Town of Seabrook, Rockingham County, a municipality in the State of New Hampshire, acting through its Selectmen or, in appropriate cases, acting by and through its authorized representatives, including the Superintendent.

Town Manager - The Town Manager of the Town of Seabrook, Rockingham County, State of New Hampshire, or his authorized agent.

Wastewater Treatment Facility - That portion of the POTW that is designated to provide treatment of sanitary sewage and industrial wastewater.

FACT SHEET

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Seabrook, NH 03874-0300

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SITE COLLECTION SYSTEM DESCRIPTION AND WASTEWATER DISCHARGES

The details of Seabrook Station's original sanitary sewer and wastewater collection system are depicted on the April 2, 1990 Public Service of New Hampshire drawing of the facility entitled "Sanitation System." This drawing depicts the two aerated lagoons previously used to collect wastewater from the facility before final discharge to surface waters. The current sewer connection to the Town of Seabrook, New Hampshire's (Town's) sanitary sewer system results in one discrete connection point (Discharge Point 001) to the sanitary sewer. The specific connection to the Town's sanitary sewer system is depicted on the Jones & Beach Engineers, Inc. drawing (Revised sheet 4 of 7) and the accompanying Figure 1 entitled "Flow and pH Monitoring Station." As this figure depicts, Discharge Point 001 is designated as an existing manhole (M.H. No. 135A) of the Town's collection system, and is the second manhole upstream of the Rocks Road pumping station. This manhole has been modified to provide sampling access to the entire wastewater stream originating from the facility. With the 2007 renewal of this permit, the sampling point was relocated from Discharge Point 001 to Sanitary Lift Station #8, which is located on the grounds of the Seabrook Station complex. Sanitary Lift Station #8 is the terminal collection point for all wastewater directed to the Town's collection system.

The discharge consists of sanitary wastewater, photo processing wastewater from the operation support building, chemistry laboratory wastewater from the high rise building, fire extinguisher hydrotesting water from the test laboratory, cooling water from the welding training shop, washing machine wastewater from the training annex, blowdown from the cooling tower at the general office building, condensate from the air conditioners for the control building, and compressor condensate discharge from the maintenance building.

MONITORING AND REPORTING REQUIREMENTS

In accordance with the Town's classification system, Seabrook Station has been designated as a Class 1 industrial user. This designation is applied on the basis that Seabrook Station exhibits reasonable potential to adversely impact the publicly owned treatment works (POTW). As a result, submittal of semiannual compliance reports, as described in the Industrial Wastewater Discharge Permit (IDP) is required. The specific reporting requirements and their respective frequencies are tabulated in Part 2 (A), Page 4 of the IDP (Scheduled Monitoring and Reporting), and are discussed in the text that follows.

Seabrook Station's SIC code (4911) and service operations are subject to regulation under the Federal Categorical Pretreatment Standards for the Steam Electric Power Generating Point Source Category, 40 CFR Part 423. The regulations include limitations that apply to discharges associated with the steam/water thermal transfer system, including boiler blowdown and wastewater generated from equipment (e.g., heat exchange systems) cleaning processes. However, these wastewaters are not proposed for discharge to the Town's POTW. As a result, only local limits are applicable to Seabrook Station's wastewater discharge.

Seabrook Station is a complex facility and maintains many service support structures that are connected to the wastewater collection system. Due to the relatively large size of the facility, the complexity of the process piping within the power production areas, and limited access to radiologically-controlled areas, it

is difficult to confirm that no process connections to the sanitary wastewater system from these areas exist. Therefore, the monitoring strategy incorporated into the IDP is intended to confirm on a continuing basis that unauthorized discharges are not present.

Based on a review of historical monitoring reports (dating back approximately ten years), the following pollutants were present at greater than background concentrations: arsenic, boron, copper, cyanide, lead, molybdenum, nickel, zinc, and total phenols. As a result, IDP monitoring is required for all of these metals and total phenols on a semiannual basis (once every 6 months) in accordance with the schedule set forth in Part 2 (A), Page 4 of the IDP. As part of the repermitting process, a one-time monitoring event is required for barium, cadmium, chromium, mercury, selenium and silver to confirm that these pollutants continue to be absent.

Seabrook Station has been required to monitor for acid and base/neutral extractable compounds (ABNs) and volatile organic compounds (VOCs) over the duration of its prior permit. A review of historical monitoring reports submitted under that permit indicates that several constituents, including bis (2-ethylhexyl) phthalate, acetone, and 3,4-methylphenol are typically present in the wastewater at greater than background concentrations. As a result, a limited IDP monitoring program is required for ABNs and VOCs on a semiannual basis (once every 6 months) in accordance with the schedule set forth in Part 2 (A), Page 4 of the IDP.

Based on the facility review completed during the repermitting process and ongoing radiological testing of the wastewater, there is no evidence to suggest that licensed radioactive materials (radionuclides) from process wastewater sources are present or are anticipated to be present. Sources for radiologically-contaminated sanitary wastewater are minimized by the absence of sanitary facilities within the radiologically-controlled areas.

However, the potential discharge of radionuclides represents the most significant perceived adverse impact that might be associated with Seabrook Station's discharge. The intentional discharge of licensed materials to the POTW was not proposed nor is it anticipated. One regulatory goal of the Town with respect to permitting Seabrook Station's wastewater discharge is to provide a prudent level of regulatory oversight to independently confirm that unauthorized radiological discharges are not present. Implementing this approach requires radiological monitoring to demonstrate that radionuclide concentrations (other than those occurring naturally) do not exceed concentrations that could be permitted under existing applicable regulatory structures.

The procedure for collection of a representative radiological test sample for reporting purposes requires a 24-hour time-proportional composite sample with an automatic sampler operating intervals not to exceed 30 minutes.

FLOWS

Existing permitted flows are based on flows reported in the January 18, 2010 IDP application submitted by Seabrook Station. The sources and amounts of these flows were consistent with information collected by the Town during a facility inspection at Seabrook Station on February XX, 2010. This information identified that flows discharged from the facility vary significantly under two different operating conditions — normal power production periods and extended staffing plant outage periods (e.g., during refueling). To facilitate regulatory compliance evaluations and to account for the significant variation in sanitary flows between normal operations and extended staffing operations, a 2-tiered permit limitation system has been established that applies different limits to cover each flow condition. The Tier 1 (normal operational periods) limits incorporate a maximum sanitary flow value of 21,270 gallons per day (gpd). This is consistent with current staffing levels and the maximum flows that have typically been experienced in recent years during normal operational periods. Although Seabrook Station may be expected to occasionally exceed this value, it is in the Town's interest to retain a mechanism that triggers review and

evaluation of unusual flow events.

The basis for flow monitoring/reporting is specified as the lift station pump running time meters. Flow volume will be calculated using the measured results of pump draw-down tests, currently 279 gallons per minute for Pump A and 288 gallons per minute for pump B based on the results of tests performed on June 11, 2008. The Town anticipates that draw-down testing will need to be repeated periodically to assess the changing pumping characteristics that will result from pump impeller wear. Drawdown tests are currently performed on a biannual frequency.

POLLUTANT DISCHARGE CONTROLS

LOCAL POLLUTANT DISCHARGE CONTROLS FOR METALS

The Town has implemented an innovative regulatory approach for conservative (e.g., metals) pollutants. Maximum allowable industrial headworks loading limits for each metal have been developed as enforceable provisions of the Seabrook Municipal Sewer System Ordinance (Ordinance). This approach is partly driven by a State of New Hampshire regulatory requirement that municipalities possess authority to incorporate mass limits into industrial user discharge permits, and also provides the Town with flexibility in allocating these amounts to discharging industrial sources. Equivalent concentration-based values (i.e., screening levels) are also maintained by the Town, independent of the Ordinance. These screening levels represent the concentrations at which all industries could be expected to discharge without causing environmental issues for the POTW.

For administrative purposes, the Town considers whether an industry is discharging each regulated pollutant at a concentration greater than typical domestic concentrations (as determined in the Local Limits Study). If an industry is determined to be discharging a pollutant at greater than domestic concentrations, the Town adds the industrial user's pollutant discharge information to its tracking system (to ensure that the Town's total allowable pounds per pollutant are not exceeded) and requires the industry to monitor the pollutant. The limitation specified in the industry's IDP will either be the screening level, or a greater alternative value (administered as a limit) if the Town determines that such a discharge will not create or contribute to adverse impacts to the Town's POTW. Normally, if an industry is not discharging a pollutant at greater than domestic concentrations, monitoring is not required for that pollutant and the domestic concentration value is identified on the IDP limitations page.

The maximum allowable industrial loadings for metal pollutants are listed in the table that follows. The Town will not issue IDPs that would allow total discharges from industries to exceed these values.

TABLE 1 – LOCAL LIMITATIONS FOR METAL POLLUTANTS

POLLUTANT	lbs/day	POLLUTANT	lbs/day
Arsenic	0.004	Lead	0.645
Barium	1.63	Mercury	0.015
Boron	7.77	Molybdenum	0.030
Cadmium	0.023	Nickel	0.335
Chromium	0.296	Selenium	0.020
Copper	1.13	Silver	0.107
Cyanide (T)	0.263	Zinc	2.15

The sampling point for Seabrook Station includes process and sanitary wastewater. The Town's pollutant controls are intended to apply only to process wastewater. Therefore, the pollutant limitations for conservative pollutants (other than molybdenum and zinc) have been adjusted to correct for the dilution that occurs from the sanitary wastewater. For this permit, the adjustments have been based on either the

Town's screening level or threshold monitoring level (as applicable) and the background concentration values used in the Town's August 2002 Local Limits Study. Tables 3 and 4, attached, illustrate the derivation of the adjusted limitations for the metals.

A discussion of specific regulatory issues is presented in the text that follows.

Screening Levels For Metals Expected To Be Present - Based on a review of recent monitoring data, the Town has determined that Seabrook Station has contributed the following pollutants at greater than domestic concentrations:

- Arsenic*
- Boron*
- Copper*
- Cyanide*
- Lead*
- Molybdenum (see special allocation agreement section below)
- Nickel*
- Zinc (see special allocation agreement section below)

*Limitations contained in this permit for these metals will be administered as screening levels.

Special Allocation Agreements - Special allocation agreements are authorized by the Town when a discharge at concentrations greater than screening levels is approved. Pollutants approved for special allocation agreements are discussed in the text that follows.

Molybdenum - The current recommended screening level for molybdenum in the Town's August 2002 Local Limits Study is 0.013 milligrams per liter (mg/L). After adjusting this limit to account for domestic flow present at the monitoring point, the screening level for molybdenum is 0.002 mg/L for the daily maximum flows. Based on historical monitoring data at Seabrook Station, this value would likely be exceeded. As such, the Town has determined that the molybdenum value of 0.005 mg/L as requested by Seabrook Station does not represent a potential for concern. As described in the Town's Local Limit Study, if an alternative value greater than the Town's screening level is implemented in an IDP, it will be administered as a local limit. Therefore, the molybdenum regulatory value of 0.005 mg/L is implemented in Seabrook Station's current IDP as a limit.

Zinc - The current recommended screening level for zinc in the Town's August 2002 Local Limits Study is 0.94 mg/L. After adjusting this limit to account for domestic flow present at the monitoring point, the screening level for zinc is 0.209 mg/L. Based on historical monitoring data at Seabrook Station, this value would likely be exceeded. As such, the Town has determined that the zinc value of 0.90 mg/L that is currently in Seabrook Station's IDP does not represent a potential for concern. As described in the Town's Local Limit Study, if an alternative value greater than the Town's screening level is implemented in an IDP, it will be administered as a local limit. Therefore, the zinc regulatory value of 0.90 mg/L is administered in Seabrook Station's current IDP as a limit.

OTHER LOCAL POLLUTANT DISCHARGE CONTROLS

Screening Levels for Organic Compounds - Screening levels for organic compounds that are applicable to Seabrook Station's discharge are presented in Table 2. The Table 2 list of compounds, from the Town's August 2002 Local Limits Study, is not intended to be all-inclusive and the identification of additional screening levels will be implemented on an as-required basis.

TABLE 2 - SCREENING LEVELS FOR ORGANIC COMPOUNDS

POLLUTANT	mg/L	POLLUTANT	mg/L
Acetone	80	Formaldehyde	1.4
Benzene	0.14	Methyl ethyl ketone	249
bis-2-Ethylhexyl phthalate	0.086	Methyl isobutyl ketone	53
Carbon disulfide	0.06	Methylene chloride	2.1
Chlorine (Total Residual)	30	Phenol	50
Chloroform	0.41	Tetrachloroethylene	0.27
4-Methylphenol	0.10(1)	Tetrahydrofuran	205
1,2-Dichloropropane	3.6	Toluene	0.68
Ethylbenzene	1.58	Xylenes	1.74

NOTE:
(1) Adjusted value that takes into consideration site-specific conditions (as requested by Seabrook Station in a January 1999 letter to the Town). The requirement for verbal reporting of exceedances for 4-methylphenol under Part 3.D of the permit has been waived for concentrations less than 0.500 mg/L. This waiver may be rescinded at any time at the sole discretion of the Town.

Screening Levels for Conventional Pollutants - The basis for establishing the screening levels for other conventional pollutants (i.e., biochemical oxygen demand, oil and grease, sodium, chloride, etc.) is provided in the Town's August 2002 Local Limits Study. As the document indicates, administration of screening levels differs from local limits, and site-specific conditions may be considered when evaluating the acceptability of certain discharges. Screening levels applicable to Seabrook Station's industrial wastewater discharge, are itemized in Part 1 (B), Page 2A and 2B of this IDP.

RADIONUCLIDES

The disposal of radioactive materials into sanitary sewers is regulated by the Nuclear Regulatory Commission (NRC) at 10 CFR Part 20 and the State of New Hampshire Department of Environmental Services, Division of Public Health Services, Bureau of Radiological Health, Rules He-P 4023 and He-P 4090 (Rules). The discharge standards for releases to sewers are identical under these rules. A copy of the State's published standards is available as Appendix D of the Seabrook Station November 1996 Discharge Permit Request submittal. New Hampshire is an Agreement State, which means that the State is delegated the responsibility for regulating licensees. However, the NRC retains responsibility for sources that have the capability to attain a critical mass of radioactive material. As a result, Seabrook Station's operations fall under NRC jurisdiction. Under either agency, the rules permit the disposal of soluble or biologically dispersible radioactive material subject to published concentration and quantity limits. Limits for individual radionuclides are published in the Rules and 10 CFR Part 20. When multiple radionuclides are present, the sum of their fractions (measured concentration divided by the allowable concentration) cannot exceed one. With the exception of tritium (hydrogen-3) and carbon-14, the annual quantity released by a licensee may not exceed one Curie (Ci). Radioactive wastes originating from patients undergoing therapy with radioactive material are not subject to these standards.

Radioactivity is measured in terms of disintegrations per unit time. The commonly used units are 1 Curie (Ci) = 1×10^9 nanocuries (nCi) = 1×10^{12} picocuries (pCi). One pCi is equal to 2.2 disintegrations per minute.

Alpha radiation is the least penetrating form of radiation and alpha radionuclides are generally of concern only if ingested or inhaled. Decay products of the naturally occurring uranium, thorium, actinium and neptunium series all emit alpha (and beta) particles. Alpha radiation can be measured by gross alpha testing, which measures the sum of all alpha emitters, but does not identify individual radionuclides. Gross alpha analysis is a relatively inexpensive test that can indicate the need for further testing. If

elevated levels are identified, alpha isotopic analysis can identify fission-related americium and plutonium. However, if these constituents are present, the more common fission-related gamma emitters will also be present (and detected by gamma spectrometry). As a result, gross alpha testing would provide a limited amount of useful information to the Town when other radiological testing is also performed. Therefore, gross alpha testing is not required in Seabrook Station's IDP.

Beta radioactivity includes emissions from natural sources such as carbon-14, potassium-40 (common in sea water) and radium. Potassium-40 activity in sea water is reportedly in the vicinity of 270 pCi/L[1]. Potassium-40 content of urine is reportedly 10,000 to 100,000 pCi/L. *[needs reference citation]* Technetium-99, associated with certain medical procedures, is a beta emitter. Groundwater beta activity typically ranges from 1 to 10 pCi/L, primarily due to naturally occurring radium and its daughter products. As with alpha analysis, the presence of fission-related radionuclides may be detected by gross beta testing. However, gross beta analysis cannot identify specific radionuclides. Therefore, if elevated activity is noted, other testing such as gamma spectrometry must be performed to determine the specific radioactive contaminants. If fission-related beta radionuclides are present, then fission-related gamma emitters would also be present, allowing gamma spectroscopy results to provide a complete, radionuclide-specific identification. Although the beta testing is redundant given these facts, the Town is requiring gross beta analysis for the Seabrook Station's IDP monitoring program on the basis that it may provide a secondary measurement to indicate the presence of potentially unreported radionuclides in a gamma scan (only those radionuclides in a selected "library" are reported).

Gamma energy is electromagnetic, similar to X-rays, except at greater energy levels. Gamma spectrometry is required to detect common radionuclides associated with nuclear power production, such as cobalt-60, manganese-54 and cesium-137. Gamma spectrometry services provided by a qualified analytical laboratory certified by the New Hampshire Department of Environmental Services can identify those radionuclides associated with nuclear power production. Reporting libraries for naturally-occurring compounds can also be requested. Gamma emitters also include iodine, which is used in certain medical treatments. The semiannual 24-hour composite wastewater sampling and gamma isotopic analysis included in Seabrook Station's IDP monitoring is consistent with the analytes specified in an NRC Branch Technical Position outlining an acceptable program for monitoring of radioactivity in the environs of nuclear power facilities. The required *minimum detectable concentration* (MDC) specified for potassium-40 is intended to support identification of gross beta activity measurements that may indicate exceedance of applicable regulatory levels for unidentified radionuclides.

A summary of radiological limitations for radionuclides that may be associated with Seabrook Station's discharge is presented in Table 3 at the end of this fact sheet. These limits apply to discharges of licensed material. The implementation of screening limits equal to half of the He-P 4090 concentration standards is intended to provide reasonable assurance that licensed material is not being inadvertently discharged to the POTW. Table 3 in not intended to be all-inclusive.

Gross beta analytical results are difficult to compare to regulatory standards because this test procedure does not identify specific radionuclides. It is anticipated that gross beta measurements will primarily be associated with potassium-40[2]. However, the regulatory concentration limit for a mixture of unidentified radionuclides is relatively stringent (20 pCi/L). On this basis, the gross beta activity measurement alone is likely to result in an exceedance of the standard for unidentified mixtures. To resolve this issue, it is anticipated that the gamma spectrometry testing will identify the presence of potassium-40 (and potentially other naturally-occurring radionuclides), and may account for most of the observed beta activity. Gross beta analysis will be performed in conjunction with the semiannual gamma isotopic

[1] Seabrook Station 1995 Annual Radiological Environmental Operating Report for samples collected in 1995.

[2] GZA Geoenvironmental estimated that a final effluent concentration of 52 pCi/L in the wastewater would result assuming 13,000 gpd of wastewater flow, 800 employees, a literature value of 120,000 pCi of potassium-40 per 70 kg person, and a 2 kg per day loss (as urine) per person.

analysis. Results will be reported in the form of a trend evaluation of historical gross beta data. If an adverse trend is observed that cannot be explained by either known therapeutic treatments or by gamma isotopic analysis, additional specific beta emitter analysis will be performed.

The Town notes that the Table 3 limits are technically applicable only to the release of licensed radioactive materials. Since Seabrook Station is not seeking authorization to intentionally discharge licensed materials, and naturally occurring radionuclides are not regulated, this comparison is administered as a screening level approach, and exceedances would not necessarily provide a basis for regulatory response unless fission-related radionuclides were present.

TIERED LIMITS

To facilitate regulatory compliance evaluations and to account for the significant variation in sanitary flow between normal operations and extended staffing operations (e.g., during refueling or other outage periods), a 2-tiered permit limitation system has been established that covers normal and extended staffing operating conditions. Accordingly, Page 2 of the permit, and Tables 3 and 4 of the Fact Sheet are presented in "A" and "B" versions, representing the two conditions.

FLOOR DRAINS

During initial facility reconnaissance activities, a potential for accidental release and discharge to the sewer of fluids from thermal reservoirs associated with heating, ventilating and air conditioning (HVAC) systems was noted. These reservoirs, or storage tanks, range in volume from approximately 2,000 to 13,260 gallons, and are located in mechanical rooms at several separate locations. Water treatment chemicals associated with these systems include ethylene glycol and chlorine. Seabrook Station reported that maintenance or tank testing operations would not result in discharge of tank contents to the sewer. However, floor drains proximate to these systems would have provided a route for direct entry to the sewer in the event of an accidental release. The Town evaluated the impact of ethylene glycol releases and determined that the potential for adverse impact from a release was significant since it would likely result in an exceedance of the wastewater treatment facility's NPDES permit BOD effluent limitation. Therefore, the Town had conditioned Seabrook Station's IDP with a requirement to continue to implement Best Management Practices procedure developed under the prior IDP to address the potential for releases from these systems.

In the year prior to the 2007 renewal of this wastewater discharge permit, Seabrook Station eliminated all floor drains discharging to the POTW with the exception of (1) restroom floor drains and (2) those located beneath the safety showers in the Training Laboratory of the High Rise Building, all of which have been granted waivers by the Town. With the elimination of the remaining floor drains, this permit no longer requires the Permittee to continue to implement the specified Best Management Practices procedures.

TABLE 3 - MAXIMUM ALLOWABLE RADIONUCLIDE LEVELS FOR RELEASE TO SANITARY SEWERS
Next Era Energy Seabrook, LLC (Seabrook Station)
Seabrook, New Hampshire

RADIONUCLIDE	ACTIVITY TYPE[2]	REGULATORY LIMIT[1]
Beryllium-7	g	6.00E+06 pCi/L
Any mixture for which either the identity or the concentration of any radionuclide in the mixture is not known[3]	b	Report [3]
Potassium-40	b, g	4.00E+04 pCi/L
Bismuth-214	b, g	3.00E+06 pCi/L
Lead-212	b	2.00E+04 pCi/L
Lead-214	b	1.00E+06 pCi/L
Radium-226	b	6.00E+02 pCi/L
Potassium-40	g	4.00E-05 uCi/mL
Lead-212	g	2.00E-05 uCi/mL
Lead-214	g	1.00E-03 uCi/mL
Radium-226	g	6.00E-07 uCi/mL

NOTES:

1. As promulgated in 10 CFR Part 20. The Part 20 concentration limits for release to sanitary sewers are expressed as uCi/mL. uCi/mL x 10^9 = pCi/L. Town screening levels for FPLE Seabrook are one-half of the above concentration values.
2. b = beta particle; g = gamma emission
3. Gross beta analysis to be performed in conjunction with semiannual gamma isotopic analysis. Results to be reported with trend evaluation of historical gross beta data. If adverse trend is observed, additional specific beta emitter analysis to be performed. For additional text, reference page 5 of the Permit Fact Sheet.

Table 4A

Flow-Weighted Averaging Formula for Calculating Adjusted Limits/Levels - Maximum

Flow at Point of Monitoring (Point C) =	23,533 gpd
Regulated flow (Point B) =	2,263 gpd
Non-regulated flow (Point A) =	21,270 gpd

Pounds/Day(A) + Pounds/Day(B) = Pounds/Day/(C)

(F(A) X C(A)) + (F(B) X C(B)) = F(C) X C(C)

Rearranged to calculate C(C):

$$C(C) = \frac{(F(A) \times C(A)) + (F(B) \times C(B))}{F(C)}$$

F(A,B,C) = Flows at Points A, B, and C

C(A,B,C) = Concentrations at Points A, B, and C

Parameter	Background Concentrations[1] C(A)	Town Screening Levels[2] C(B)	Adjusted Screening Levels C(C)
Arsenic	0.0095	0.013 *	0.010
Barium	0.023	0.031	0.0238
Boron	0.2873	3.4 *	0.587
Cadmium (total)	0.0004	0.005	0.0009
Chromium (total)	0.006	0.012	0.007
Copper	0.0872	0.495 *	0.126
Cyanide (total)	0.001	0.115 *	0.012
Lead	0.005	0.282 *	0.032
Mercury	0.0002	0.0003	0.0002
Molybdenum	0.0008	0.013 *	0.002
Nickel	0.0088	0.147 *	0.022
Selenium	0.004	0.007	0.004
Silver	0.001	0.009	0.002
Zinc	0.131	0.94 *	0.209

NOTE

(1) Background concentrations are those used in the Town's 2002 Local Limits Study.

(2) Values marked (*) are screening levels developed in the Town's 2002 Local Limits Study. Values not so marked are Threshold Monitoring Levels developed by the Town.

Table 4B

Flow-Weighted Averaging Formula for Calculating Adjusted Limits/Levels - Maximum

Flow at Point of Monitoring (Point C) = 52,263 gpd

Regulated flow (Point B) = 2,263 gpd

Non-regulated flow (Point A) = 50,000 gpd

Pounds/Day(A) + Pounds/Day(B) = Pounds/Day/(C)

(F(A) X C(A)) + (F(B) X C(B)) = F(C) X C(C)

Rearranged to calculate C(C):

$$C(C) = \frac{(F(A) \times C(A)) + (F(B) \times C(B))}{F(C)}$$

F(A,B,C) = Flows at Points A, B, and C

C(A,B,C) = Concentrations at Points A, B, and C

Parameter	Background Concentrations[1] C(A)	Town Screening Levels* C(B)	Adjusted Screening Levels C(C)
Arsenic	0.0095	0.013 *	0.010
Barium	0.023	0.031	0.023
Boron	0.2873	3.4 *	0.422
Cadmium (total)	0.0004	0.0053	0.001
Chromium (total)	0.006	0.012	0.006
Copper	0.0872	0.495 *	0.105
Cyanide (total)	0.001	0.115 *	0.006
Lead	0.005	0.282 *	0.017
Mercury	0.0002	0.0003	0.0002
Molybdenum	0.0008	0.013 *	0.001
Nickel	0.0088	0.147 *	0.015
Selenium	0.004	0.007	0.004
Silver	0.001	0.009	0.001
Zinc	0.131	0.94 *	0.166

NOTE

(1) Background concentrations are those used in the Town's 2002 Local Limits Study.

(2) Values marked (*) are screening levels developed in the Town's 2002 Local Limits Study. Values not so marked are Threshold Monitoring Levels developed by the Town.

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH
L&C ANNEX – THIRD FLOOR
401 CHURCH STREET
NASHVILLE, TENNESSEE 37243-1532

LICENSEE:

NextEra Energy Seabrook, LLC
Seabrook Station
P.O. Box 300
Seabrook, NH 03874

Delivery License Number: T-NH001-L11

Date of Expiration: December 31, 2011

Pursuant to Tennessee Department of Environment and Conservation Regulations, and in reliance on statements and representations made by the licensee in application dated November 30, 2010, with attachments, a license is hereby issued authorizing the licensee to ship radioactive material described below to a licensed disposal/processing facility within Tennessee. This license is subject to all applicable rules and regulations of the Tennessee Department of Environment and Conservation and orders of the Division of Radiological Health, now or hereafter in effect.

The license authorizes shipment of any radioactive material (except special nuclear material sufficient to form a critical mass) in any chemical and/or physical form and in a quantity not to exceed the possession limit of the licensed recipient.

The licensee is authorized to ship radioactive material from the facility located at:

Seabrook Station
626 Lafayette Rd
Seabrook, NH 03874

into or within Tennessee to a disposal/processing facility that is licensed by Tennessee to receive such material.

The licensee shall comply with all applicable provisions of the regulations and conditions of the recipient facility's license.

Effective date of this license: January 1, 2011

For the Commissioner
Tennessee Department of
Environment and Conservation

Date: December 20, 2010

By: _____
Michael Singleton
Health Physicist
Division of Radiological Health

STATE OF TENNESSEE
DEPARTMENT OF ENVIRONMENT AND CONSERVATION
DIVISION OF RADIOLOGICAL HEALTH
L&C ANNEX – THIRD FLOOR
401 CHURCH STREET
NASHVILLE, TENNESSEE 37243-1532

December 20, 2010

NextEra Energy Seabrook, LLC
Seabrook Station
P.O. Box 300
Seabrook, NH 03874

Attention: William Meyer, Radiation Protection Manager

RE: Radioactive Waste License-for-Delivery

Mr. Meyer:

Attached to this letter is your Tennessee Radioactive Waste-License-for-Delivery number T-NH001-L11 issued with an expiration date of December 31, 2011.

If we may be of further assistance, please feel free to contact me at (615) 532-0405.

Sincerely,

Michael Singleton
Health Physicist
Division of Radiological Health

Attachments:

GARY R. HERBERT
Governor
GREG BELL
Lieutenant Governor

State of Utah

DEPARTMENT OF ENVIRONMENTAL QUALITY
Division of Radiation Control

Amanda Smith
Executive Director

Dane L. Finerfrock
Division Director

April 29, 2010

Mr. William Meyer
NextEra Energy Seabrook LLC
PO Box 300
Seabrook, NH 03874

Dear Mr. Meyer:

Subject: Generator Site Access Permit Number 0111000045

The Generator Site Access Permit for NextEra Energy Seabrook LLC is complete and approved. The expiration date is 4/30/2011.

If you have any questions, please call Edith Barker of my staff at (801) 536-0077.

Sincerely,

Dane L. Finerfrock, Director

Enclosure

cc: Allan Erichsen, EnergySolutions
Jule Fausto, DRC Transportation Specialist
Jeff Ginsburg, EnergySolutions

UTAH DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF RADIATION CONTROL
GENERATOR SITE ACCESS PERMIT
ACCESSING A LAND DISPOSAL FACILITY WITHIN UTAH
UNDER THE PERMIT REQUIREMENTS IN R313-26-3

R313-26 of the Utah Radiation Control Rules establishes the terms for a Generator Site Access Permit Program which authorizes waste generators, waste processors and waste collectors to deliver radioactive wastes to a land disposal facility located within the state.

Name: NextEra Energy Seabrook LLC	Permit Number: 0111000045
Address: PO Box 300 Seabrook, NH, 03874	Expiration date: 4/30/11
Password: 9i30TyGV *Your password is required to renew your permit online. Store this information in a secure location.*	

Conditions:

1. The waste generator, waste processor and waste collector shall comply with the provisions of R313-26 and the requirements as set forth in R313-19-100.

2. The permit number shall accompany all waste generator, waste processor and waste collector shipments to the land disposal facilities within the state of Utah.

3. Generator Site Access permittees shall be subject to the provisions of Rule R313-14 for violations of federal regulations, state rules or requirements in the current land disposal facility operating license regarding radioactive waste packaging, transportation, labeling, notification, classification, marking, manifesting or description.

UTAH RADIATION CONTROL BOARD

11/28/01	4/30/10	Dane L. Finerfrock
Registration Date	Activation Date	Dane L. Finerfrock, Executive Secretary

Payment Summary:

Name:
Receipt Number:
Routing Number:
Amount Paid: $2500
Account Number:

For security reasons, your permit will not be active until after a 72-hour waiting period.

Please note: There will be an adjustment to the expiration date for on-line renewals. Please allow 30 days for expiration adjustment notification.

COMMONWEALTH OF VIRGINIA
APPLICATION FOR REGISTRATION TO TRANSPORT HAZARDOUS RADIOACTIVE MATERIALS

PLEASE TYPE OR PRINT

XXX Shipper ____ Carrier ____ Receiver

Company Name NextEra Energy Seabrook, LLC

Company Address PO Box 300

City Seabrook State NH Zip Code 03874-0300

Office Phone 603-773-7000 **Emergency Phone** 603-474-8330

Chief Executive Officer Paul Freeman** Phone 603-773-7452

Radiation Safety Officer William Meyer Jr. Phone 603-773-7626
Principal Contact Person William Meyer Jr. Phone 603-773-7626

Mode(s) of Transportation: XXX Truck ____Rail ____Ship ____Air____Other

(Specify other) ____N/A_____

Estimated number of shipments per year 20

In accordance with regulations promulgated under Title 44, Code of Virginia, Chapter 3.3, Section 44-146.30, I hereby certify that all hazardous radioactive material shipments transported throughout the Commonwealth of Virginia will be fully and accurately described by proper shipping name and will also be properly classified, described, packaged, marked and labeled, and in proper condition for transportation according to all applicable federal and state rules and regulations.

NAME William Meyer Jr. TITLE: Radiation Protection Manager - Nuclear

SIGNATURE WJMeyer DATE 09/27/10

** **Senior Officer On-Site**

VDEM USE ONLY

APPROVED BY VIRGINIA DEPARTMENT OF EMERGENCY MANAGEMENT

SIGNATURE John Gary Shirley TITLE Env. Prog. Manager

REGISTRATION NUMBER FP-S-103110 EXPIRES 31 Oct 2012

[Form A2, Rev. 7/00]

NEXTera ENERGY SEABROOK

August 17, 2010

SBK-L-10141

New Hampshire Department of Environmental Services
Waste Management Division
Oil Remediation & Compliance
P.O. Box 95
29 Hazen Drive
Concord, NH 03302-2033

Seabrook Station
Stage I/II Gasoline Vapor Recovery Station Notification

NextEra Energy Seabrook, LLC has enclosed a completed Stage I/II Gasoline Vapor Recovery Station Notification Form for recertification of the gasoline station Stage I/II vapor recovery system at Seabrook Station (Facility ID# 930908A). The Seabrook Station Certificate of Compliance (Certificate No. 021207930308A) expires on December 11, 2010.

NextEra Energy Seabrook, LLC intends to have a vendor, P.M. Environmental Inc., perform the recertification testing of the Seabrook Station gasoline station Stage II vapor recovery system. The vendor will contact NHDES in the near future to schedule a test date.

Should you have any questions regarding this letter please contact Ms. Sabre Gagnon, Engineering Analyst, at (603) 773-7795.

Sincerely,

NextEra Energy Seabrook, LLC

Michael O'Keefe
Licensing Manager

Enclosure

STAGE I/II GASOLINE VAPOR RECOVERY
STATION NOTIFICATION FORM

(One per station)

FACILITY

Name NextEra Energy Seabrook, LLC
Physical Address 626 Lafayette Road
City Seabrook
Gasoline Brand Buxton Oil Co. Reg Unleaded
Phone 603-773-7280
Contact at Facility William Gough

OWNER OF GASOLINE STORAGE TANKS

Contact Name Michael O'Keefe
Company Name NextEra Energy Seabrook, LLC
Address PO Box 300
City, State, Zip Seabrook, NH 03874
Phone 603-773-7000 ext. 7745
Fax 603-773-7740

ANNUAL GASOLINE GALLONS THROUGHPUT - All grades (gasoline only)
(Commercial information submitted only to determine compliance with N.H. Env-A 1205.)

2002		2007	5,960
2003		2008	8,133
2004		2009	9,017
2005		2015	
2006		2016	

Reason(s) For Submittal of Notification Form [X] Recertification [ ] Owner Change [ ] Modification [ ] New Facility

STAGE I CONTROLS

Coaxial ____ Two Point X
Dry Break on Manifold X
Tee on Vent yes
Installer Northeast Tank Services
Date of Installation December 2001

STAGE II CONTROLS

Type of Equipment AST-Healey - ORVR G-70-187
Installer Northeast Tank Service Company Inc.
Date of Installation December 2001

Total # of dispensers 1 Total # of nozzles 1
Number of gasoline tanks 1 Grades of gas in tanks Unleaded Regular

I certify that the above information is true and correct. Michael O'Keefe
(Signature of Owner)

Please return to:

N.H. Waste Management Division
Oil Remediation & Compliance
P.O. Box 95
29 Hazen Drive
Concord, NH 03302-2033

NEW HAMPSHIRE DEPARTMENT OF Environmental Services

The State of New Hampshire

DEPARTMENT OF ENVIRONMENTAL SERVICES

Thomas S. Burack, Commissioner

FYI
RMS
Lapenda
Gagnon

February 4, 2011

RECEIVED

FEB 10 2011

M.D. O'Keefe

Mr. Michael O'Keefe
Licensing Manager
NextEra Energy Seabrook, LLC
PO Box 300
Seabrook, New Hampshire 03874

Re: Air Permit Application Completeness Determination
NextEra Energy Seabrook, LLC, 626 Lafayette Road, Seabrook, NH
Facility ID # 3301500047; Application # 10-0220

Dear Mr. O'Keefe:

The New Hampshire Department of Environmental Services, Air Resources Division (DES) has reviewed the Title V Operating Permit renewal application filed on December 22, 2010 for NextEra Energy Seabrook, LLC's facility located at 626 Lafayette Road, Seabrook, New Hampshire. NextEra Energy Seabrook, LLC (NextEra) submitted additional information on January 28, 2011. DES has deemed the application complete in accordance with the New Hampshire Code of Administrative Rules Env-A 609.11, *Completeness Determination*. Although the application has been deemed complete, DES may request additional information in accordance with Env-A 609.12, *Application Deficiencies* to complete its technical review. Pursuant to Env-A 622.06, *Public Access to Information*, a copy of the permit application will be transmitted to the town of Seabrook.

DES will prepare a draft permit provided the evaluation of the application indicates that NextEra is eligible to obtain a renewal of its Title V Operating Permit. The draft permit will be provided for your review and comment. DES will also submit this information to the United States Environmental Protection Agency for review and comment. In accordance with Env-A 622.02, *Public Notice*, a public notice describing the permit will be prepared by DES and published by either DES or NextEra in the Manchester Union Leader *and* in a newspaper of general circulation in the area of the facility. The public notice will invite comments regarding the proposed decision.

Please note that, in accordance with Env-A 609.07, *Timely Application*, applications to renew Title V Operating Permits are due to DES six months prior to the expiration date of a facility's existing Title V Permit. The previously issued Title V Permit for this facility expires on June 30, 2011. DES received the renewal application on December 22, 2010. Therefore, continued operation of the facility is covered under the application shield provisions of Env-A 609.08, *Application Shield*.

If you have any questions concerning this matter, please contact Catherine Beahm of the Air Resources Division, Bureau of Permitting and Environmental Health by calling (603) 271-2822 or via e-mail at catherine.beahm@des.nh.gov.

Sincerely,

Gary D. Milbury, Jr.
Air Permit Programs Manager
Permitting & Environmental Health Bureau

cc: Town of Seabrook