Comprehensive WWTF Upgrades

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Paige Durant, PE



WRIGHT-PIERCE *Engineering a Better Environment*

NPDES Permit Drivers

- " Why are nutrients an issue in the environment?
- Stimulates algae and plant growth, DO issues
- Total Phosphorus limiting freshwater nutrient
- Total Nitrogen limiting marine water nutrient
- " Why might my permit change?"
- Updated nutrient or toxicant criteria (NHDES, EPA)
- Changes in receiving water body (impairment, dilution)
- Reasonable potential calculations
- Total Maximum Daily Load (TMDL) development





Previous WWTF



- Aerated Lagoon Facility brought online in 1985
- Treats ~120,000 gals/day (annual avg.) of domestic sewer and discharges to the John's River
- Headworks Building
 - Grit Channels
 - Manual Bar Rack for Influent
 Screening
- Control Building
 - Lagoon Blowers
 - Lab

Project History

Administrative Order on Consent

- Address current effluent violations
- Total Phosphorus limit: 0.5 mg/L

Project Dates

- Complete design of improvements: 5/31/2019
- Initiate construction: 9/1/2019
- Substantial completion: 5/31/2020

United States Environmental Protection Agency Region I - New England

IN THE MATTER OF

Town of Whitefield, New Hampshire NPDES Permit No. NH0100510

Proceedings under Sections 308(a) and 309(a)(3) of the Clean Water Act, as amended, 33 U.S.C. §§ 1318 and 1319(a)(3) Docket No. CWA-AO-R01-FY16-11

FINDINGS OF VIOLATION AND ORDER FOR COMPLIANCE ON CONSENT

I. STATUTORY AUTHORITY

The following FINDINGS are made and ORDER ON CONSENT ("Order") issued pursuant to Sections 308(a) and 309(a)(3) of the Clean Water Act, as amended (the "Act"), 33 U.S.C. §§ 1318 and 1319(a)(3). Section 309(a)(3) of the Act grants to the Administrator of the U.S. Environmental Protection Agency ("EPA") the authority to issue orders requiring persons to comply with Sections 301, 302, 306, 307, 308, 318, and 405 of the Act and any permit condition or limitation implementing any of such sections in a National Pollutant Discharge Elimination System ("NPDES") permit issued under Section 402 of the Act, 33 U.S.C. § 1342. Section 308(a) of the Act, 33 U.S.C. § 1318(a), authorizes EPA to require the submission of any information required to carry out the objectives of the Act. These authorities have been delegated to the EPA, Region I Administrator, and in turn, to the Director of the EPA, Region I Office of Environmental Stewardship ("Director").

The Order herein is based on findings of violation of Section 301 of the Act, 33 U.S.C. § 1311, and the conditions of NPDES Permit No. NH0100510. Pursuant to Section 309(a)(5)(A) of the Act, § 1319(a)(5)(A), the Order provides a schedule for compliance that the Director has determined to be reasonable.

II. DEFINITIONS

Unless otherwise defined herein, terms used in this Order shall have the meaning given to those terms in the Clean Water Act, 33 U.S.C. §§ 1251 et. seq., the regulations promulgated thereunder,



Whitefield WWTF Timeline





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Nutrient Removal Upgrade Considerations

- What are my site specific requirements?
 - Total Phosphorus (TP) Ibs vs. mg/L
 - Total Nitrogen (TN) Ibs vs. mg/L
 - Seasonal vs. Year-round
- Potential future NPDES permit limits
- Condition of existing infrastructure and process
- Performance of existing process
- Adaptability of existing process



Aerated Lagoon



Oxidation Ditch



Plug-Flow BNR Reactor



Sequencing Batch Reactors (SBRs)



Biological Nutrient Removal Treatment Alternatives

Sequencing Batch Reactor













- Process Building
- Headworks Building
- Process Tankage including SBR Treatment
 - TN Removal
 - TP Removal (Bio-P)
- Chemical Addition (FeCl)
- Tertiary Filtration (TP removal)
- Sludge Dewatering

Hello New Technology!









" So, what's it cost to meet these new permit changes?







NPDES Small General Permit (NH & MA)

- Final issued in 9/28/2021
- WWTP's < 1 MGD design flow
- EPA's "umbrella" approach to address NPDES permit renewals
- ~29 WWTPs in NH are eligible
- Nutrients, ammonia, metals site specific

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMITS FOR SMALL WASTEWATER TREATMENT FACILITIES (WWTFs)

Note: These permits are organized as a single permit and are referred to herein as the "General Permit" or the "WWTF GP". The effluent limitations and specific conditions for facilities in Massachusetts and New Hampshire are contained in Parts II and III, respectively. Parts IV through VIII include conditions which are common to both permits.

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The following documents are separate attachments to the WWTF General Permit:

Part VIII - Standard Conditions

Attachment A – Freshwater Acute Toxicity Test Procedure and Protocol, February 2011 Attachment B – Freshwater Chronic Toxicity Test Procedure and Protocol, March 2013 Attachment C – Marine Acute Toxicity Test Procedure and Protocol, July 2012 Attachment D – Marine Chronic Toxicity Test Procedure and Protocol, November 2013 Attachment E – List of Eligible Facilities

I. Applicability and Coverage of the WWTF GP

A. Eligible Discharges

Wastewater treatment facilities, including publicly owned treatment works and other treatment works that treat domestic sewage (collectively "wastewater treatment facilities", "facilities" or "WWTFs") are classified as either a "major" or a "minor" discharger. "Major" dischargers are facilities with design flows equal to or greater than 1 million gallons per day (MGD) and any other facilities designated by EPA, in its discretion, as a "major" facility (40 CFR §§ 122.2, 124.2). All other facilities are generally classified as "minor" dischargers. Coverage under the WWTF GP is available only to minor facilities in Massachusetts and to major and minor facilities in New Hampshire that meet the requirements of this Part. See Attachment E for a list of eligible facilities.



NPDES Permit & Small General Permit

	NPDES Permit (April 2022)	Notes
BOD5 (mg/L)	30	
TSS (mg/L)	30	
Total Phosphorus (lb/day)	0.79	Apr 1 – Oct 31
Ammonia (mg/L)	21.5	Jun 1 – Oct 31
Total Copper (ug/L)	18.5	
Total Aluminum (ug/L)	87	
PFAS Monitoring	N/A	



Previous & Upgraded Conditions

	March 2021	July 2021*
BOD5 (mg/L)	29	11
TSS (mg/L)	30	7
Total Phosphorus (mg/L)	7	< 3**
Ammonia (mg/L)	42	1
Total Copper (ug/L)	31	8
Total Aluminum (ug/L)	39	0

*New WWTF brought online May/June 2021 **Prior to chemical optimization for TP removal









Paige Durant, PE

paige.durant@wright-pierce.com 207.523.1413

THANK YOU



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