Seabrook Water & Sewer Department

PO Box 456
Seabrook, NH 03874
(603)-474-9921

MEMORANDUM

To: Board of Selectmen

Cc: William Manzi III; Town Manager

From: Curtis Slayton; Water & Sewer Superintendent

Date: March 10th, 2025

Subject: Monthly Report from January 2nd to Date

Below is a list of activities ongoing and completed by the Water & Sewer Department staff since the last report.

WATER

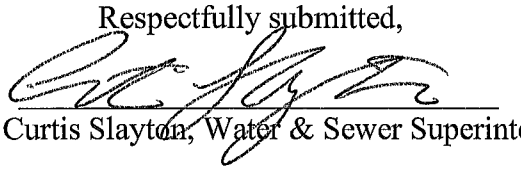
- Responded to 56 requests for service to include water turn on/off, inspections and meter repairs.
- Responded to 36 dig safe requests.
- 28,990,000 gallons of treated water was pumped into the distribution system in January and 29,285,000 gallons in February
- Meter readings were completed on the first of every month.
- Monthly bacteria samples were completed.
- Curbstop repair at 38 Rocks Rd. completed work orders for locating curbstops in GIS.
- Emergency water main repair in front of 63 and 34 Dows Ln. also 53 Adams Ave.
- The Ground Water Management Plan is still being maintained by staff.
- 4th quarter water and sewer bills when out at the end of January.
- Copper cleaning in the process area.
- Cleaned garage area.
- Completed work orders.
- Brush cutting around wells and roadways.
- Specific capacity testing on wells was completed.
- Chipping brush at the disk golf park.
- Onsite cyber security training.
- Snow removal and hydrant clearing.
- Cleaned well house for wells 3 & 7
- Inventory of distribution system parts ordered replacement of recently used components.
- Repairs to the chlorine bulk tank feed line.
- Repairs to potassium hydroxide pump.

- Created video for article on the town warrant.
- Residential lead and copper samples are ongoing.
- Painting at GPW #4.
- Stripped floor and waxed the Forman's office.
- State vehicle inspections completed in March
- Backflow tester sent out for calibration.
- Meeting with Steve Keany at the beach on Water and Sewer access fees.

SEWER

* 26 million gallons of wastewater treated in January and 22 million gallons in February.
* 186 tons of biosolids were sent out in January and 160 tons in February.
* Monthly operation reports sent to NHDES and USEPA
* Daily lab work 7 days a week
* Snow removal
* Chief operator created a video for the wastewater article on the town warrant.
* Weekly pump station checks.
* We have received our new Draft NPDES discharge permit from EPA. We have reviewed and sent our comments by the deadline. (see attached)
* Yearly biosolids report sent to NHDES as required. (see attached)
* Monitored chemical deliveries.
* January 16th at 6:30 am a large sewer leak was discovered at the Centennial Pump Station. The leak was coming from the forcemain just outside the station wall. It was a 12-inch gate valve that was 16 feet deep. We immediately took the station offline and called a fleet of septic haulers and a dirt contractor to make the repair. The repair took about 30 hours to complete. (see NDES letter attached)
* Screw pump replacement work is ongoing. We have had several meetings with engineers, construction people and screw pump reps. We are going with direct replacement parts to save on design costs.
* Rotor #4 stub shaft has failed, and the new parts are on order.
* NHDES inspection
* Cyber security work is still on going. Waiting on ground to thaw to install new fiber optic cable.
* Cleaned debris from pumps at Old New Boston, Worthley Ave and Pine Crest pump stations.
* Changed pressure reducing valve on Sludge Disposal Building boiler system.
* Replaced both electric pump motors at Causeway pump station for bad capacitors.
* Alarm testing at pump stations
* Rebuilt piston on press 1 it was leaking hydraulic fluid.
* Changed hydraulic fluid in press #2.
* Repaired motor on the Influent odor control unit.
* Took delivery of new pump truck. (see attached)
* Repaired float in Route 1A meter pit.

Respectfully submitted,



Curtis Slayton, Water & Sewer Superintendent

SEABROOK WATER DEPARTMENT

Water Delivered

Year: **2025** Month: **Jan-25**

Gravel Packed Wells

1:	**6,807,000**
3:	**246,000**
7:	**2,727,000**

Plant: **19,210,000**

Total: **28,990,000**

Previous Month / Year	Jan-24	Total	31,012,000
Previous Month / Year	Jan-23	Total	26,833,000

Respectfully submitted: George M. Eaton Chief Op

Date: 1/3/2025

SEABROOK WATER DEPARTMENT

Water Delivered

Year: **2025** Month: **February**

Gravel Packed Wells

1: **6,555,000**
3: **3,351,000**
7: **252,000**

Plant: **19,127,000**

Total: **29,285,000**

Previous Month / Year Feb-24 Total 26,278,000
Previous Month / Year Feb-23 Total 27,205,000

Respectfully submitted: George M. Eaton Chief Op

Date: 3/3/2025

Town of Seabrook
Wastewater Treatment Facility
Wright's Island
P.O. Box 456
Seabrook, New Hampshire 03874
Telephone (603) 474-8012 Fax (603) 474-8014
Administrative Office (603) 474-8030

February 12, 2025

Michael Cobb
US EPA Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912

VIA EMAIL ONLY TO COBB.MICHAEL@EPA.GOV

RE: COMMENTS ON REGION 1 DRAFT NEW HAMPSHIRE MEDIUM WASTEWATER TREATMENT FACILITY GENERAL PERMIT, NHGP590000

Dear Mr. Cobb,

On November 13, 2025, Region 1 of the United States Environmental Protection Agency (EPA) issued Draft NPDES Permit No. NHGP590000 (the draft permit) to all medium-sized wastewater treatment facilities (WWTFs) with a design flow of between 1 and 5 million gallons per day (MGD). The Seabrook, New Hampshire WWTF is eligible for coverage under this permit upon authorization. The Town of Seabrook, New Hampshire (the town) utilized the comment period to evaluate the proposed terms and develop comments in response to the requirements set forth in the draft permit.

The town owns and operates a wastewater treatment facility WWTF that discharges treated effluent to the Gulf of Maine of the Atlantic Ocean. The WWTF collects and treats domestic, commercial, and industrial wastewater throughout the town. The system is a separate system as there are no combined sewer stormwater structures.

The WWTF has a design flow of 1.8 MGD to treat collected wastewater via an extended aeration process. Process flow begins with all flow conveyed to the influent screw pump vault at the headworks building. Flow continues through mechanical screening and grit removal, secondary treatment via dual train oxidation ditches, secondary clarification, and disinfection via chlorination. Dechlorination occurs at the Route 286 Pump Station, which conveys effluent flow to the ocean outfall.

Regarding the draft permit, we formally request that EPA take under consideration the following comments:

Whole Effluent Toxicity Testing

The town's draft permit authorization indicates that Whole Effluent Toxicity (WET) Testing be performed monitored and reported quarterly. The Clean Water Act Section 403(c) Ocean Discharge Criteria Evaluation, issued in March 2024, provides a detailed assessment of whether the WWTF discharge will or will not cause "unreasonable degradation."

The evaluation considered 10 guidelines to make this determination, including verification of the WWTFs dilution factor of 36, developed through the scientific determination of the WWTFs substantial available dilution and subsequent dispersion into the receiving water. The summary in Part II. Criteria Evaluation indicates that "the facility has been able to comply with the toxicity requirements in the past and is expected to be able to continue to operate in compliance in the future." In addition, the evaluation concluded that "based on available information, EPA finds that this discharge will not cause unreasonable degradation of the marine environment." This was based on an evaluation of 10 guidelines.

WET testing is another costly monitoring burden and, given the WWTFs performance in regard to years of prior WET Testing, expends funds that can be applied to other draft permit requirements. Given the above conclusions and demands for vital operational funds, the town requests that:

1. Modify draft permit Part II.A.1. to require WET Testing once annually.

Total Kjeldahl Nitrogen, Nitrate + Nitrite, and Total Nitrogen

The draft permit includes new monitoring requirements for these parameters under Part II.A.1. Section 3.1.8.1 of the Fact Sheet relates to Total Nitrogen. This section references Total Maximum Daily Loads (TMDLs) and applicable Waste Load Allocations (WLAs) in estuaries such as Long Island Sound, Narragansett Bay, and Buzzards Bay. It also provides additional details for WWTFs discharging into the Long Island Sound watershed. It also references the Great Bay watershed and WWTFs discharging to it and subject to the permit. These water bodies have been the focus of multiple studies and regulatory and legal actions to justify monitoring requirements and numerical discharge limitations.

The Fact Sheet also alludes to the Merrimack River estuary and the Gulf of Maine. These water bodies have no TMDL and associated WLA, as the Fact Sheet states. The Fact Sheet instead indicates that EPA has "concerns about nitrogen discharges" in these water bodies and they "may be experiencing nitrogen enrichment."

These draft permit requirements total over 70 composite samples that would need to be collected and analyzed annually. The cost associated with these requirements are burdensome to the town and require resources that can be better applied to necessary operational, safety, and compliance issues. It is accurately acknowledged that the WWTF discharges to the Gulf of Maine. However, there is no reference to a scientific study that correlates the town's WWTF discharge to the general Fact Sheet "concern" about nitrogen discharges within this approximately 36,000 square mile marginal sea. Accordingly, the town requests that EPA revise the draft permit as follows:

1. Remove Total Kjeldahl Nitrogen, Nitrate + Nitrite, and Total Nitrogen monitoring requirements in their entirety from the town's authorization.

Aesthetics

The draft permit requires that WWTFs conduct monthly aesthetics observations consisting of "visual inspection of the receiving water in the vicinity of the outfall and report any changes that may be caused by the discharge" for a wide variety of subjective characteristics. In addition, this requirement applies to taste or odor complaints and how a permittee will address these complaints. There is also an annual reporting requirement.

The town has significant concerns related to this new imposition. This constitutes an additional series of assessments and reports associated with the condition of the receiving water well beyond the outfall and regulated discharge point. WWTFs have no control of receiving water quality, and would require staff to take on the added responsibility of policing water quality in the vicinity of the discharge. In addition, this requirement presents a safety risk and requires long-term capital investment of watercraft and associated PPE, specialty staff training and licensure' and may require the town to procure additional insurance.

We request that EPA revise the draft permit as follows:

1. Remove Aesthetic Monitoring requirements in their entirety from the town's authorization. This would also be consistent with the Region 1 Final Medium Wastewater Treatment Facilities General Permit for Massachusetts, Permit Number MAGP590000. Such a revision would be also consistent with the intent of section E of the New Hampshire State Certification which, in accordance with 40 CFR 124.53, states that the reduction in aesthetic monitoring would not make the draft permit less stringent and would not violate State law and New Hampshire water quality standards because the requirement does not address effluent water quality, but only the receiving water quality which the permittee has no direct control beyond the specified discharge.

Pollutant Scan

The draft permit requires the town to perform an annual Pollutant Scan of more than 100 pollutants listed in Attachment I that ultimately total 12 samples for effluent and ambient samples throughout the permit period. A single pollutant scan is estimated to have a 2025 cost of more than $1,000.

As an alternative, the town requests that EPA revise the pollutant scan monitoring requirements in the draft permit to align with the Region 1 Final Medium Wastewater Treatment Facilities General Permit for Massachusetts, Permit Number MAGP590000. Specifically:

1. Eliminate Annual Pollutant Scan Requirements. Remove the requirement for annual pollutant scans of effluent and ambient samples.
2. Reduce Pollutant Scans to Three Per Permit Term. Revise Part II.I to require three effluent pollutant scans, conducted once per quarter in the final three full calendar quarters of the 5-year permit term.
3. Remove Ambient Pollutant Scan Requirement. WWTFs are not responsible for ambient water quality; accordingly, remove requirements to conduct ambient pollutant scans.

These revisions would eliminate expensive monitoring costs, align with a directly comparable and recently issued general permit, and enable WWTF management to apply these cost savings to other compliance and operational concerns.

Benthic Survey

The draft permit requires that the town perform a benthic survey. Part II.H.6. includes language and parameters of the survey. It is understood that New Hampshire has proposed changes to these requirements to link the requirement to a known and understood negative impact caused by the discharge. However, this introduces several concerns, as follows:

1. High Cost and Financial Burden. The town has procured initial estimates for a benthic survey focused on the impacts of the WWTF discharge on aquatic life in the benthic environment. It is likely this survey will approach $100,000. This is because the town's discharge is located approximately 2,100 feet offshore at a depth of 30 feet below Mean Sea Level. There is no indication of whether EPA or the state would provide funding assistance or if the cost would be fully borne by the community.
2. Need for Clarity Between Effluent Conditions and Survey Triggers. It is unclear whether there is a correlation between effluent parameters such as Dilution Factor and the need for a benthic survey. The town's Dilution Factor as stated in the draft permit is 36, a change from the calculated 72 as issued in the town's 2010 NPDES permit. The outfall is designed to distribute effluent flow across a network of 20 diffuser ports equipped with pinch valves, further increasing dilution in this ocean discharge. It is unclear whether these conditions designed to increase dilution in the receiving water are sufficient to preclude performance of this very costly survey.
3. Unclear Triggers for Survey Requirement. The conditions that would constitute a "known or suspected detrimental impact" on downstream benthic communities are not defined.
4. Lack of Notification and Timeline Clarity. The draft permit does not specify how the town would be notified of the requirement or how much time would be provided to complete a survey, which may cause a lack of funding that prevents compliance.

The town requests that EPA work with NHDES and consider how to revise the draft permit to account for the following:

1. Evaluate water quality standards, discharge characteristics, and dilution factors that best correlate to benthic community health and apply exclusions to this requirement for permittees known to meet them.
2. Define specific effluent-based criteria that would trigger a survey.
3. Clarify notification procedures and provide flexibility in associated compliance schedules.
4. Consider incorporating clear, codified survey triggers into New Hampshire water quality regulations.
5. Identify potential funding support for communities required to conduct surveys.

Adaptation Planning

EPA has received comments on multiple previous draft permits that included the requirements found in Part II.C.1. These comments have addressed the significant burden Adaptation Planning requirements apply to permittees due to its comprehensive scope, rigid timelines, and lack of financial support. These concerns remain relevant and applicable as a response to the rationale provided in Appendix D of the draft permit Fact Sheet.

It is important to also focus on the details of *Component 3: Implementation and Maintenance Schedule* found in Part II.C.1.a. Given the requirements and completeness of a permittee's Adaptation Plan and the nature of procuring funding at the town level, the 48-month timeline is too restrictive. Competing needs of a WWTF and collection and conveyance systems, as well as those across all aspects of municipal government, make it difficult to achieve strict compliance with such mandates and prevent officials from designating funds in a

manner that best protects all constituents through investment in infrastructure systems, social service programs, public safety, etc.

Given these challenges, the town requests that Part II.C.1.a. language be modified to allow permittees to be flexible in implementing and maintaining their adaptive measures so they may balance all infrastructure investments.

PFAS and Adsorbable Organic Fluorine Monitoring

Part II.A. and Footnotes 14 and 15 of the draft permit include requirements for testing PFAS and Adsorbable Organic Fluorine (AOF) for effluent, influent, and sludge; however, these testing methods have not been adopted nationally. The EPA rulemaking process indicates that final action for these methods is still "To Be Determined." Given this status, PFAS and AOF testing does not at present align with EPA guidance. Additionally, the proposed monitoring requirements impose significant financial and operational burdens on affected WWTFs, particularly smaller facilities that are not included in EPA's ongoing national study.

Accordingly, the town requests the following changes to the draft permit:

1. Delay Implementation Until Lab Capacity Increases. It is widely acknowledged by permittees and regulators that there is limited availability of certified laboratories for PFAS and AOF testing. This deficiency not only negatively impacts permittees seeking to comply with monitoring and reporting requirements but also drives up the cost of compliance. The town has received an estimate of approximately $40,000 for annual testing. These are in 2025 dollars and thus are expected to increase as a result of both overall demand for said testing and inflation. This requirement should not take effect until such time as an independent analysis indicates that sufficient laboratory capacity has become readily available to all impacted permittees.
2. Revise Footnote 2. Remove references to PFAS and AOF testing from this footnote until these methods are officially promulgated under 40 CFR Part 136. Currently, no finalized Clean Water Act (CWA) methods exist for these parameters and removal aligns with the still-pending status these methods.
3. Remove Footnotes 14 and 15. These footnotes require testing using Methods 1633 and 1621, despite recognized limitations. Method 1621 is a speculative test with known interferences, including non-PFAS compounds.
4. Align with National EPA Study Parameters. The EPA study on wastewater influent PFAS is limited to WWTFs with a capacity of 10 MGD or larger and serving populations of 50,000 or more. The draft permit extends these testing requirements to smaller facilities, many of which are eligible for coverage under the draft permit but do not meet the criteria of the national study. This requirement should be removed to align with EPA's intended phased approach.
5. Subject to the above comments, align the measurement frequency of PFAS in sludge to that of the pollutant scan by changing the requirement to one sample per year. This is a revision from the one sample per quarter requirement in the draft permit.

In summary, the town's requests for draft permit changes reflect our concerns related to exceptionally challenging operational, compliance, and financial strains on municipalities; considers scientifically-based analysis and guidance, brings a measure of reasonableness to all permit requirements, and ensures that monitoring requirements are based on sound methodologies.

The town is confident that EPA will consider each comment in its entirety and fully recognizes that Seabrook has worked for decades to be a steward of the environment and approaches our day-to-day responsibility to protect our water resources for today's residents and future generations with the utmost seriousness and diligence. These comments have been submitted via email in a timely manner, in advance of the February 12, 2025, close of the comment period.

Respectfully submitted,

TOWN OF SEABROOK, NEW HAMPSHIRE

William M. Manzi, III
Town Manager

cc: Curtis Slayton, Town of Seabrook Water and Sewer Superintendent
Daumanic Fucile, Town of Seabrook Chief Operator
Christopher Perkins, Weston & Sampson
John Sykora, Weston & Sampson

TOWN OF SEABROOK

SEWER DEPARTMENT

274 RTE 286 ~ PO BOX 456

WRIGHT'S ISLAND

SEABROOK, NEW HAMPSHIRE 03874

February 19, 2025
NH0101303

Administrator
United States Environmental Protection Agency – Region 7
ATTN BIOSOLIDS CENTER
WWPD/WENF
11201 Renner Boulevard
Lenexa Kansas 66219

Re: Annual Biosolids Report

Dear Sirs,

Enclosed for your review is the annual biosolids production report for the calendar year of Jan-Dec 2024 for the Town of Seabrook, NH Wastewater Treatment Facility.

The Town has an agreement with Casella Organics, formally (New England Organics), to compost and/or otherwise beneficially use all biosolids generated at the Town's Wastewater Treatment Facility.

During 2024, the Town of Seabrook generated a total of **1660 wet tons** of biosolids, which equaled **219 dry tons,** all of which Casella transported from the town to their facility for composting.

No biosolids generated at our facility were applied directly in a land application permitted site.

Enclosed is a table of analytical test results and copies of contract lab reports performed on samples of biosolids during the reporting period.

Please contact me if you have any questions.

Sincerely,

Daumanic Fucile
Chief Operator
dfucile@seabrooknh.org
(603) 395-6223

CC: Mr. William M. Manzi III, Town Manager

TOWN OF SEABROOK

SEWER DEPARTMENT

274 RTE 286 ~ PO BOX 456

WRIGHT'S ISLAND

SEABROOK, NEW HAMPSHIRE 03874

January 21, 2025
NH0101303

Stephanie Larson
New Hampshire DES
Water Division / WEB
PO Box 95
Concord, NH 03302-0095

Dear Ms. Larson,

This letter serves as written notification of the SSO that occurred 1/16/25 at 31 Centennial St in Seabrook, NH. At 0627 our collections system foreman was driving by the Centennial St pump station when he noticed water flowing across the lawn and into the street. He stopped and investigated, believed it to be wastewater coming from a ruptured force main and notified our chief operator and superintendent. The chief operator responded and together him and the foreman confirmed it was sewage coming from the force main as the plume of water was effected by the pumps running inside the station. Immediately Stewarts Septic Services was called in to begin shuttling wastewater from the pump station and stop the overflow. We kept up with the flow coming into the pump station but didn't stop the overflow condition until between 1400 and 1500 when we finished draining the 18" force main back into the wet well.

JP Cardillo Construction was called in to do the digging and repair of the force main, and at 0300 on Friday 1/17 the leak was found 16 feet deep on a 12" gate valve, the gasket for the top of the valve had blown out. A replacement gasket was unable to be sourced so the entire gate valve was replaced, with the completion of the valve replacement the pumps were tested and we confirmed no leaks at 1100. After the hole was backfilled, the area was heavily limed.

We estimate that the leak would have started at midnight the morning of 1/16 and that roughly 100,000 gallons of untreated wastewater were released into the environment. Over the course of 27 hours we estimate that 600,000 gallons of wastewater were carried over the road by six tanker trucks and one tanker trailer.

Please contact me if you need any further information regarding this matter.

Respectfully,

Daumanic Fucile
Chief Operator
dfucile@seabrooknh.org
(603) 395-6223

CC: Solanch Pastrana-Del Valle, EPA ~ Chris Nash, DES ~ William Manzi III, Town Manager – Seabrook, NH ~ Curtis Slayton, Superintendant

1/16/25 NH0101303 Seabrook, NH Sanitary Sewer Overflow Timeline

Thursday 1/16

0627 Garret Murphy, our collections system foreman was driving by the Centennial St pump station and noticed water flowing across the lawn and into the street, he stopped and investigated, believed it to be wastewater coming from a rupture in the force main

0629 He notified Daumanic Fucile the Chief Operator, and Curtis Slayton the superintendent

0643 Daumanic calls Curtis to confirm the break in the force main

0645 Daumanic calls Stewarts Septic to set up tanker shuttles to stop the use of the leaking force main

0648 Daumanic calls NHDES Shellfish Chris Nash to notify him of the SSO

0743 Curtis calls JP Cardillo to do the excavation and repair work

0743 Stewarts Septic arrives on site and we start moving wastewater in trucks instead of through the pumps and force main

0905 Call Stephanie Larson from NHDES to inform her of the event, leave a voicemail

1108 Notify Mass Shellfish of SSO

1109 Call Solanch Pastrana-Del Valle of US EPA to inform her of the event, leave a voicemail

1400-1500 force main is drained back into the wet well, wastewater is no longer leaking into the environment, and all wastewater is being moved by trucks. Begin excavating to find the leak, but digging goes slow because of a water line, a gas line, and an 18" gravity sewer main that are in the way. We are also digging right against the pump station building. Both the water and gas lines have to be cut and moved out of the way. The gravity sewer line has to be stabilized. The force main we are looking for is roughly 16 feet deep.

Friday 1/17

0300 Locate break in the force main, a gasket as blown out of the top of a gate valve. Start trying to locate a replacement in our inventory of gate valves but we don't have any that match, unfortunately this model is discontinued so we will have to replace the entire valve.

1100 New gate valve has been installed and we try running the pumps for the first time, there is no leaks and we can now utilize the force main again. Send pump trucks home. Start backfilling hole.

1251 Update Chris Nash that we are back online without issue

1305 Update Stephanie Larson

1315 Update Solanch Pastrana-Del Valle

1425 Update Mass Shellfish

~1700 Water has been restored, gas has been restored and generator has been tested. Hole is backfilled and brought to grade. End of event.