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Monadnock Paper Mills, Inc. 117 Antrim Road Bennington, New Hampshire 03442-4205

Phone 603 588 3311 Fax 603 588 3158 www.mpm.com

re2012/31/09

December 21, 2009

Bill Wandle
US Environmental Protection Agency
New England Region 1
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

SUBJECT: Monadnock Paper Mills, Inc. - NPDES No. NHG360000 General Permit Coverage

Dear Mr. Wandle,

Monadnock Paper Mills, Inc. is submitting the Notice of Intent (NOI) for request for coverage under the General Permit to Discharge Authorized Waste Water Associated with hydro operation in the State of New Hampshire.

Monadnock Paper Mills, Inc would also like to request that the original NPDES permit application for coverage of the hydroelectric generating facilities owned and operated by Monadnock Paper Mills, Inc submitted in 1998, be withdrawn.

If you have further questions, please contact Michelle Hamm at 603-588-3311 extension 255.

Sincerely

Michelle Hamm

Manager-Environmental Services

Cc:

Daniel Dudley - NHDES

NPDES Notice of Intent for hydro's in NH



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY NEW ENGLAND - REGION I 5 POST OFFICE SQUARE, SUITE 100 BOSTON, MASSACHUSETTS 02109-3912

Request for General Permit Authorization to Discharge Wastewater (Notice of Intent (NOI) to be covered by the General Permit)

Hydroelectric Generating Facilities (HYDROGP) NPDES General Permits No. MAG360000 and NHG360000

A. Facility Information	
1. Indicate applicable General Permit for discharge	: MAG360000
1000	NHG360000 X
2. Facility Name, Location, and Data:	20.000000000000000000000000000000000000
Name Monadnock Paper	Mill - Pierce power station CityBennington, Zip Code03442 Longitude071_55_30
Street POB 30 Havack - Island off	City Definingion,
Latitude 43 00 11	Zip Code 03442
Type of Pusiness Paper Mill	Longitude 071 33 30
SIC Code(s) 2621	
SIC Code(s)	
Facility Mailing Address (if different from Local Name	
Street/PO Box	City
State	Zip Code
4. Facility Owner: Name Monadnock Paper Mill Street/PO Box State Contact Person Michelle Hamm Owner is (check one): 1. Federal Other (Describe)	_ City
 Facility Operator (if different from above): Legal Name Same as above 	e-mail (optional)
Street/PO Box	City
State	Zip Code
Contact Person_	e-mail (optional) City Zip Code Telephone Number
 6. Current permit status (please check Yes or No): a. Has a prior NPDES permit (individual or general the NOI? Yes No X If Yes, Permit b. Is the facility covered by an individual NPDES to the No. 	permit coverage) been granted for the discharge that is listed on Number: Application submitted in 1998
If Yes, Permit Number	V
c. Is there a pending NPDES application on file wi of submittal: 12/9/98 and perm	th EPA for this discharge? Yes X No If Yes, date nit number if available:

7. Attach a topographic map indicating the location of the attached? <u>yes</u>	facility and the outfall(s) to the receiving water. Map
8. Provide the number of turbines and the combined turbin minimum output, in cubic feet per second (cfs). Number of capacity): maximum output, cfs 432 an minimum output, cfs	f turbines 2 Combined turbine discharge (installed
9. Is the hydroelectric generating facility operated as a pur	mp storage project?
B. Discharge Information (attach additional sheets a	as needed).
Name of receiving water into which discharge will occur Freshwater: X Marine Water:	ur: Contoocook River
 Attach a line drawing or flow schematic showing water water, operations contributing flow, treatment units, ou schematic attached? Yes 	flow through the facility including sources of intake atfalls, and receiving waters(s). Line drawing or flow
 List each outfall under the following categories and num equipment and floor drain water; maintenance-related we water events, and equipment-related backwash strainer v Attach additional sheets to identify outfalls as neede 	ater; facility maintenance-related water during flood/high water (see Parts I.A.1, 2, 3, and 4; or Parts I.B.1, 2, 3, and
Equipment-related cooling water	Equipment and floor drain water
Maintenance-related water	Facility maintenance-related water during flood/high water events
Equipment-related backwash strainer water	

4. List each outfall discharging any combination of the following to identify the combined discharges: equipment-related cooling water, equipment and floor drain water, maintenance-related water, equipment-related backwash strainer water, and facility maintenance-related water during flood/high water events (see Parts I.A.5 and B.5) and continue the sequential numbering. Attach additional sheets to identify outfalls as needed.

- 5. Provide for each outfall the following:
- a. Latitude and longitude to the nearest second (see EPA's siting tool at: http://www.epa.gov/tri/report/siting_tool/) and the name(s) of the receiving water(s) into which the discharge will occur.
- b. The operations contributing flow and the treatment received by the discharge. Indicate the average flow from each operation.
- c. Indicate if the discharge can be sampled at least once per year or can be sampled using the representative outfall sampling provisions (see Parts I.A.6 or B.6 and III.E).
- d. Note if the outfall discharges intermittently or seasonally.

C. Chemical Additives

Are any non-toxic neutralization chemicals used in the discharge(s)? Yes _____ No___ If so, include the chemical name and manufacturer; maximum and average daily quantity used on a monthly basis as well as the maximum and average daily expected concentrations (mg/l) in the discharge, and the vendor's reported aquatic toxicity (NOAEL and/or LC₅₀ in percent for typically acceptable aquatic organism).

D. Endangered Species Act Eligibility Information

A facility, with a previous ESA Section 7 consultation with the National Marine Fisheries Service (NMFS), seeking coverage under the Massachusetts general permit and discharging to the Connecticut River or Merrimack River should provide one of the following, if available.

- 1. A formal certification indicating consultation with the National Marine Fisheries Service (NMFS) resulted in either a no jeopardy opinion or a written concurrence on a finding that the discharges are not likely to adversely affect the shortnose sturgeon or critical habitat. Information should also be provided indicating the hydroelectric facility's previous ESA Section 7 consultation with NMFS covered the discharges to be authorized under this general permit and demonstrating no significant changes in the discharges have occurred since the previous consultation.
- 2. Another operator's certificate of the ESA eligibility for those discharges to be authorized under this general permit.

E. Supplemental Information

Please provide any supplemental information, including antidegradation review information applicable to new or increased discharges. Attach any certification(s) required by the general permit.

F. Signature Requirements

The Notice of Intent must be signed by the operator in accordance with the signatory requirements of 40 CFR Section 122.22 (see below) including the following certification:

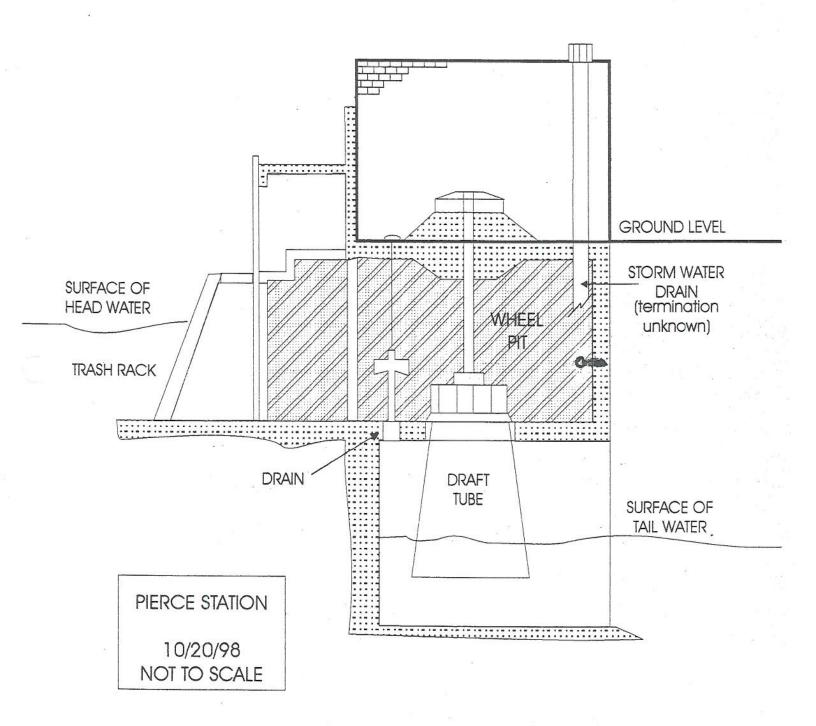
I certify under penalty of law that no chemical additives are used in the discharges to be authorized under this general permit except for those used for pH adjustment and (2) this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure 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, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I certify that I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature	-, 2 = 1 =	7	Date /2 - /5-	09
Printed Name and Title	Richard Verney, Chairman	n and CEO		

Federal regulations require this application to be signed as follows:

- 1. For a corporation, by a principal executive officer of at least the level of vice president;
- 2. For partnership or sole proprietorship, by a general partner or the proprietor, respectively, or,
- 3. For a municipality, State, Federal or other public facility, by either a principal executive officer or ranking elected official.

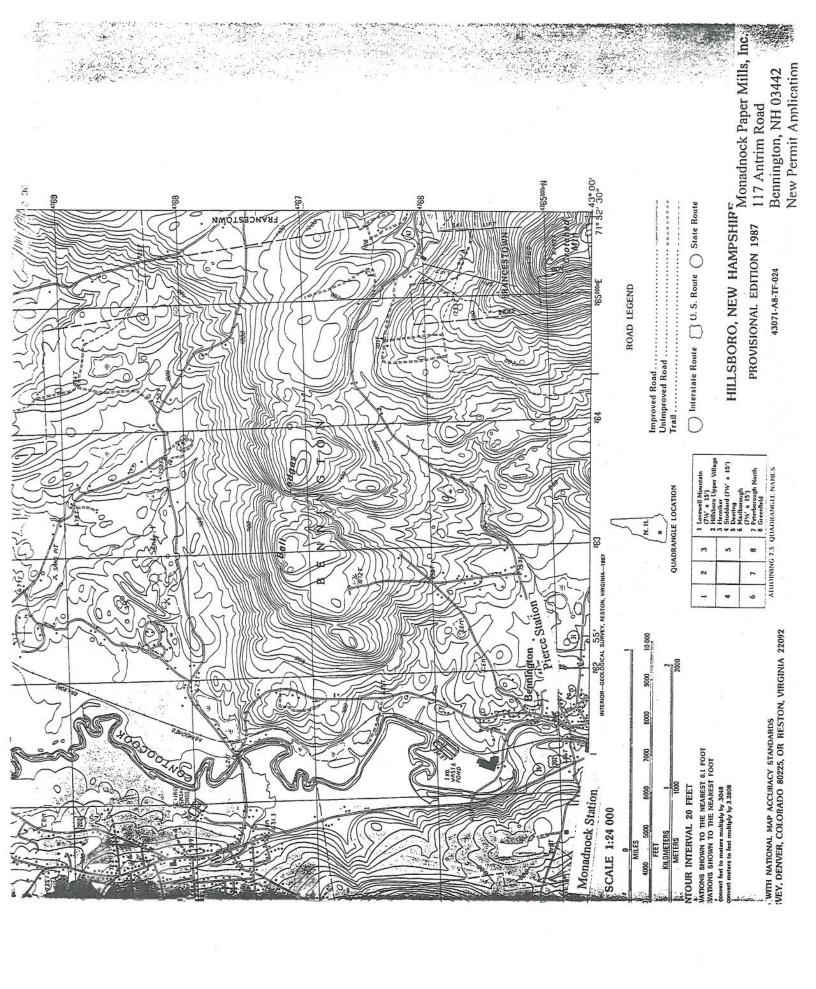


Agency Corres.

EXHIBIT- G SHEET- 2

GENERAL INFO GENERAL INFO GENERAL INFO Consolidated Parmit (Read the "General Instructio LABELITEMS PA I.D. NUMBER III. FACILITY V. MAILING ADDRESS PLEASE PLACE LABEL I VI. FACILITY LOCATION				orovea, UMB No. 2040-0086 A	oproval	expire	es 7-31-88
	NERAI	INFOR	MATION	EPAT DENUMBER			
GENERAL (Read the	onsolida	stad Parmies	Decare	F			T/A
PA I.D. NUMBER				GENERAL INST If a preprinted label has it in the designated speciation carefully; if any of	been e. Revi	provi	ided, affia he inform
V. FACILITY	ACE L	ABEL IN	THIS SPACE	through it and enter the appropriate fill—in area to the preprinted data is ableft of the label space that should appearl, ples proper fill—in area(s) be	e corre selow, sent (t lists th	Also, the and the in	ata in the , if any of rea to the formation
VI. FACILITY LOCATION				terns I, III, V, and VI must be completed regal items if no label has been the instructions for def	u need (except rdless), n proving tailed	not Vi . Corrided.	complete I-B which mplete ell Refer to
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II. POLLUTANT CHARACTERISTICS				A RESTRICTION OF THE PARTY OF T			SAME.
INSTRUCTIONS: Complete A through J to determine a questions, you must submit this form and the supplement if the supplemental form is attached. If you answer "no is excluded from permit requirements; see Section C of the	'to each	insteam in fil	to parentnesis rollowing the ques	rtion. Mark "X" in the box in	n the th	hird c	
SPECIFIC QUESTIONS	YES N	PORM			YES		FORM ATTACHE
A. Is this facility a publicly owned treatment works which results in a discharge to waters of the U.S.? (FORM 2A)	X		discharge to waters of the	nimal feeding operation or a facility which results in a U.S.? (FORM 2B)		X	
C. Is this a facility which currently results in discharges to waters of the U.S. other than those described in A or B above? (FORM 2C)	X Z	X	D. Is this a proposed facility in A or B above) which	Will result in a discharge to		X	21
Does or will this facility treat, store, or dispose of hazardous wastes? (FORM 3)	X		taining, within one quar	at this facility industrial or the lowermost stratum con-		_26 X	27
G. Do you or will you inject at this facility any produced water or other fluids which are brought to the surface in connection with conventional oil or natural gas production, inject fluids used for enhanced recovery of oil or natural gas, or inject fluids for storage of liquid	X		tion of fossil fuel, or reco			32 X	33
hydrocarbons? (FORM 4) Is this facility a proposed stationary source which is one of the 28 industrial categories listed in the instructions and which will potentially emit 100 tons per year of any air pollutant regulated under the Clean Air Act and may affect or be located in an	34 38 X		per year of any air pollutar	stationary source which is trial categories listed in the Il potentially emit 250 tons it regulated under the Clean, be located in an attainment		38 X	39
attainment area? (FORM 5) III. NAME OF FACILITY	41	A - 62 . V	area? (FORM 5)	De located in an attainment	43	44	45.
1 SKIP Pierce Station				,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	T T		
IV. FACILITY CONTACT		40.0			69	11188	
A. NAME & TITLE (last, fir	st, & titl	e)	- 140 B.P	HONE (area code & no.)	2 11		APPLICATION OF THE PERSON OF T
2 Hamm Nichel e Mg	L = F	inv.	Svcs. 603	5 8 8 3 3 1 1			
V. FACILITY MAILING ADDRESS	вох					4	Ed Sail
3 1 1.7. Antrim Road.	<u> </u>						
c I I I I I I I I I I I I I I I I I I I	New Er	ga.	C.STATE D. ZIP CODE]			
4 B.e.n.n.i.n.g.t.o.n.	- North		NH 0 3 4 4 2	- 4205		M.	
VI. FACILITY LOCATION			40 41 42 47		7 387		
A STREET, ROUTE NO OR OTHER S			R			:51 :::	
Hillsborough	7 1		45	STATE OF THE STATE			
4 CCT ON TOWN	STATE	bridge et en en	D.STATE E. ZIP CODE	F. COUNTY CODE		10 (10) 10 (10) 10 (10)	
6 Bennington			NH 0 3 4 4 2	(if known)			

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VIII.SIC copies (saigle) in order of priority				
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C. THIRD	13 Table 1	15 16 - 19	D. FOURTH	The state of the s
(specify)	1 2 1	c (specify)		
16 - 19		15 16 - 19		
VIII. OPERATOR INFORMATION	BURNESS STREET			
	A. NAME			B. Is the name listed Item VIII-A also ti
8 Monadnock Paper	Mills,	Inc.		owner?
15 16				YES NO
C. STATUS OF OPERATOR (Enter the approp		er box; if "Other", specify.)	D. PH	ONE (area code & no.)
F = FEDERAL M = PUBLIC (other than fed S = STATE O = OTHER (specify) P = PRIVATE	deral or state)	specify)		3 5.8.8 3.3.1.1
E. STREET OR I	P.O. BOX		1151 110 -	21 19 - 21 22 - 25
1 1.7. A.n.t.r.i.m., R.o.a.d.		55		
F. CITY OR TOWN		G.STATE H. ZIP	ODE IX. INDIAN L	AND
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X. EXISTING ENVIRONMENTAL PERMITS	PHILIPPING CARRY			
A. NPDES (Discharges to Surface Water)		s from Proposed Sources)	1 L	
9 N	9 P			
B. UIC (Underground Injection of Fluids)	15 16 17 18 E. OTHE	R (specify)		
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C. RCRA (Hazardous Wastes)		R (specify)	<u> </u>	
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5 17 18	15 16 17 10			4
MAP	Part of the last o		The Sales of the Sales of	
Attach to this application a topographic map of the outline of the facility, the location of each treatment, storage, or disposal facilities, and express had a storage.	h of its existing and peach well where it inje	roposed intake and disch	arne structures each	of its hazardaus
water bodies in the map area. See instructions f		S.		
XII. NATURE OF BUSINESS (provide a brief descripti	ion)		artist areas	
hydroelectric generati	ng station			
	119 20001011			
		W.		
XIII. CERTIFICATION (see instructions)				ACCEPTANCE OF A STATE OF
I certify under penalty of law that I have personattachments and that, based on my inquiry capplication, I believe that the information is to false information, including the possibility of file	or usose persons imme	anistali, manananihla taa -	- ha	
A. NAME & OFFICIAL TITLE (type or print)	B. SIGNATU	JRÉ	71	C. DATE SIGNED
Richard G. Verney			~ .	
Chairman and CEO		(1 2	\	12-7-98
MENTS FOR OFFICIAL USE ONLY	Name of the last o		The second second	
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OM8 No. 2040-0086 Approval expires 7-31-88

Pierce

2G SEPA

U.S. ENVIRONMENTAL PROTECTION AGENCY APPLICATION FOR PERMIT TO DISCHARGE WASTEWATER EXISTING MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURAL OPERATIONS

Consolidated Permits Program

		ATION

NPDES

NUMBER	В.	LATITUDE	E	c. ı	ONGITUE	ЭE	D. RECEIVING WATER (name)
(list)	1. DEG.	2. 10194.	3. SEC.	1. DEG.	Z. MIN.	3. SEC.	D. RECEIVING WATER (name)
001	43	00	11	071	55	30	Contoocook River
002	43	00	11	071	55	30	Contoocook River
							-61
		1					

II. FLOWS, SOURCES OF POLLUTION, AND TREATMENT TECHNOLOGIES

- A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in Item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.
- B. For each outfall, provide a description of: (1) All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, and storm water runoff; (2) The average flow contributed by each operation; and (3) The treatment received by the wastewater. Continue on additional sheets if necessary.

OUT-	2. OPERATION(S) CONTR		3. TREATME	NT
(list)	a. OPERATION (list)	b. AVERAGE FLOW (include units)	a. DESCRIPTION	b. LIST CODES FRO
.01	wheel pit drain	69,100		
01	east	gallons		
-	wheel pit drain	34,600		
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R ₂						3. FRI	EQUENCY		•	4. FLOW	H-7.	
1. OUTFALL		2. OPER	OITA	N(5)		a. DAYS	b. MONTHS	a. FLOV		b. TOTAL		
NUMBER (list)		CONTRIBU	TING	FLO	W	PER WEE	K PER YEAR	I. LONG TERM	2. MAXIMUM	1. LONG TERM	ith units)	ATION
1		1.				average)	average)	AVERAGE	DAILY	AVERAGE	DAILY	(in days)
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		ne beari 1 leakaq										
	500	u reakay	е									.a. —
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							See ALL	acrinent	LO FOLIII	2C)		
III. PRODUCTI	ON		1000								XX PACS TO L	Golden III
A. Does an effi	uent guide	eline limitation	n prom	ulgated	by EPA unde	er Section 3	04 of the Clean	Water Act app	ly to your fac	cility?		
		lete Item III-B						———	o Section IV)			
B. Are the limi	tations in	the applicable	efflue	nt guid	leline expresse	d in terms o	f production (o					
		lete Item III-C							o Section IV)			
used in the	applicable	to Item III-B le effluent gu	, list the ideline,	e quan , and ii	tity which rep ndicate the af	resents an fected outfa	actual measure ills.	ment of your l	evel of produc	ction, express	ed in the term	s and units
				1.	AVERAGE DA	ILY PRODU	ICTION					
a. QUANTITY PE	ER DAY	b. UNITS OF	F MEASI	JRE		c. o	PERATION, PRODU	JCT, MATERIAL	. ETC.		2. AFF	ALLS
							(spec	ify)			(list outfall	num bers)
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IV. IMPROVEM	ENTS				THE STATE OF			1018 PAR 118		IN ALEXANDER	Hall Switzers	STATE OF STATE OF
A. Are you now	v required	hviany Fede	eral Str	ate or	local authorit	/ to most o						
or loan cond		permit condu	tions, a	armins	(complete the	rcement orc	iers, entorcemen	t compliance	schedule lette	rs, stipulation	s, court orders	, and grant
1. IDENTIFICAT	ION OF	CONDIZION	_		TED OUTFAI		uote)	X NO (go to	o Item IV-B)		14 518	A1 COM
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B. OPTIONAL	You ==	/ 9000ah c Jul										
B. OPTIONAL: your dischar	rges/ you	now have un	onal shaderway	eets de	scribing any a high you plan	dditional wa	iter pollution co whether each pr	ntrol program	s (or other en	vironmental p	rojects which	may affect
planned sche	edules for	construction.	Шм	ARK'	'X" IF DESCE	RIPTION OI	ADDITIONAL	CONTROL F	ROGRAMS	S ATTACHE)	

EPA Form 3510-2C (Rev. 2-85)

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Form Approved. OMB No. 2040-0086 Approvel expires 7-31-88

CONTI	MILLER	FROM	DA	000

possession.	any of the pollutants listed in T II. For every pollutant you list, t	able 2c-3 of the oriefly describe	e instructions, which you know the reasons you believe it to be	or have reason to believe present and report any	is discharged or may analytical data in y
1. POLLUTANT	Z. SOURCE		1. POLLUTANT	2. 50	JRCE .
	* \$ 2.		#1 #10 #15	# E	
N/A			9		
	ž. "				
*	*		* * * * * * * * * * * * * * * * * * * *		# # # # # # # # # # # # # # # # # # #
/I POTENTIAL DIRECTOR	NOT COVERED BY ANALYSIS		* :		

Testing was performed	t(s) and describe their purposes below)				77
Testing was performed for the receiving water			NO (go to Sect	tion VIII)	
	and submitted in accordan er approximately 1/2 mile	ce with NI downstream	PDES permit No of this fac	No. NH 0000 cility.	230
		2	n př		
				•	
	N.		27		
CONTRACT ANALYSIS INFORMATION re any of the analyses reported in Item V pe	rformed by a contract laboratory or consul	ting firm?		THE PROPERTY OF	(1.1)
re any of the analyses reported in Item V per visa (list the name, as analyzed by, each	ddress, and telephone number of, and pollu h such laboratory or firm below)	tants	NO (go to Secti		
re any of the analyses reported in Item V pe		tants	NO (go to Secti	ion IX) D. POLLUTANI	
re any of the analyses reported in Item V per Y & S (list the name, as analyzed by, each A. NAME	ddress, and telephone number of, and pollu h such laboratory or firm below)	tants	TELEPHONE	D. POLLUTANT	
re any of the analyses reported in Item V per visa (list the name, as analyzed by, each	ddress, and telephone number of, and pollu h such laboratory or firm below)	tants	TELEPHONE	D. POLLUTANT	
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Monadnock Paper Mills, Inc. NPDES Permit Application (New) Pierce Station Form 2C Appendix

Section 1.C.2. - Operation(s) Contributing Flow

Pierce Station is primarily a run-of-river hydroelectric facility. Pierce Station has two turbines, both are active. This station receives water from and discharges to the Contoocook River. The station is manually controlled and is operated and maintained by Monadnock Paper Mills, Inc.

As with all hydroelectric generating facilities, Pierce Station uses large volumetric flows of non-contact river water to generate electricity via turbines. This river water is not adversely impacted in quality or quantity and is not subject to the NPDES permit program.

Several minor point source discharge are present at this station. Pierce Station has two wheel pits. When maintenance is required on the shaft or paddles of the wheel below water level, sluice gates are lowered and the incoming water to the wheel pit is shut off. The pit, then partially full of water is drained by manually pulling a plug anchored to the turbine floor. These drains are referred to as outfall 001 and outfall 002 in the Pierce Station Form 2C application.

These discharges can consist of river water and leakage from the turbine bearing seals which may accumulate within the wheel pits. The discharges are intermittent and seasonal, following the general maintenance schedule based on accessibility and river flow. The outfalls are inaccessible because of the inability to reach the discharge. Access would be from a precarious position next to the dam, far below the actual wheel pit.