

Joint Venture

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March 15, 2017

TO: Scott Hansen

CC: Jamie Dunn, Eric Ealy, Tom Perry, Pat Carr, Alan Buell, Brad Hay, Brian Bell, Rich Onderko, Matt Schowengerdt

FR: Brian Symons and Michael Raimonde

RE: Ashland/NSP Lakefront Site: Modification to OM&M Plan, Treatment Media

The LTWTS has been in operation since June 2016. Since that time, NSPW has consistently met the discharge criteria to Lake Superior set by the Substantive Requirements of a WPDES Permit for the Ashland NSP/Lakefront Site to Chequamegon Bay within the Fish Creek Watershed in the Lake Superior Drainage Basin, Ashland County. The treatment system employs adsorption media including organoclay followed by three beds of activated carbon. As part of NSPW's ongoing efforts to optimize the operations of this system, they intend to evaluate replacing the organoclay media with activated carbon and/or a mixture of organoclay and activated carbon to evaluate the consumption rates and cost/performance benefit. Generally, the use of 100% organoclay has presented maintenance issues associated with change outs and disposal that can be potentially avoided by using activated carbon or a mix of organoclay and activated carbon.

With your concurrence, NSPW intends to change media and conduct cost/performance analysis over the next several months. This is a minor operational change and there is no expectation that the discharge to Chequamegon will be affected. As you know, NSPW has been using only activated carbon in the STWTS since its inception and have successfully achieved discharge standards.