

Mr. David Ferris
Department of Environmental Protection
10 Commerce Way
Woburn, MA 01801

Re: Merriman, PCC Specialty Products, Inc.
Groundwater Discharge Permit Renewal

Dear David:

In June of 1993, Merriman submitted a Groundwater Discharge Permit Renewal Application to the Department. That application included information on sanitary wastewaters, process wastewaters, cooling tower blowdown, and groundwater remediation system discharge. Merriman has been operating on a temporary permit due to the fact that we have not received a response from the Department to the 1993 Application.

Since June of 1993, certain regulatory programs have changed such that some of Merriman's discharges can now be covered under other programs. Specifically, under Massachusetts Contingency Plan (MCP) the discharges from the groundwater remediation system, both the groundwater and the surface water, are exempted from additional state permitting requirements provided that the Licensed Site Professional (LSP) in charge of the site certifies that the discharges are in compliance with the regulations. The discharge from our remediation system is in compliance with the latest revision to the MCP (310 CMR 40.0042 & 310 CMR 40.0045).

Federal Permit requirements for the remediation system discharge are satisfied by obtaining a National Pollutant Discharge Elimination System (NPDES) Permit Exclusion or a NPDES permit has been issued by the United States Environmental Protection Agency. A NPDES Permit exclusion for the groundwater discharge is currently in effect. Under this exclusion, no further action is necessary until requested by the EPA.

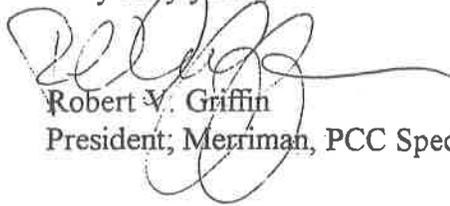
EPA has also prepared a general permit for stormwater discharges known as the Multi-Sector General Permit. Merriman is eligible for general permit coverage under Section AA, Fabricated Metal Products, and Sector AB, Industrial and Commercial Machinery. Merriman has filed a Notice of Intent to obtain this permit coverage for all the stormwater discharges from the site which are associated with industrial activity.

As indicated in the June 1993 Application, process water is currently treated in an evaporator so that no process wastewater is discharged from the facility. The cooling

-tower blowdown referenced in the Application no longer is discharged to a stormwater outfall. There currently is no discharge from that system. Merriman intends however, to periodically blowdown the cooling tower and discharge the blowdown into the existing evaporator system.

Therefore, we request that DEP process the existing Application considering only the sanitary waste discharges from the Merriman facility. We have evaluated the possibility of installing a septic system under Massachusetts Title V regulations and have come to the conclusion that it is not possible to replace our existing system at this time. If you have any questions regarding the Groundwater Discharge Permit Renewal Application, please do not hesitate to call Brian Condon, Environmental Coordinator at (617) 749-5100.

Very truly yours,



Robert V. Griffin
President, Merriman, PCC Specialty Products, Inc.

cc: Todd Brown, PE
Tighe & Bond
53 Southampton Road
Westfield, MA 01085

RVG/bc

Certified Mail: David Ferris - P 070 671 239

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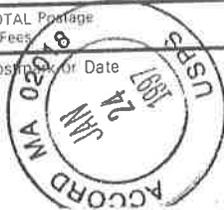


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PS Form 3800, June 1991



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10 Commerce Way
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