

**2008**

**New Hampshire Estuaries Project**



**Total Nitrogen Concentrations in Wastewater Treatment Plant  
Effluent in the Great Bay Estuary Watershed in 2008**

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# EXHIBIT 25 (AR K.18)

## Introduction

Nitrogen enrichment is a growing concern for the Great Bay Estuary. For the 2006 State of the Estuaries report (NHEP, 2006), the NHEP calculated the nitrogen load from wastewater treatment facilities (WWTF) using data on total dissolved nitrogen in WWTF effluent in 2002 from Bolster et al. (2003). The NHEP needs to update this indicator for the 2009 State of the Estuaries report. Not only is more recent data needed but also measurements of total nitrogen are needed to avoid assumptions about the ratio of dissolved to total nitrogen. Therefore, the NHEP allocated staff time to collect effluent samples from the major WWTFs in the Great Bay watershed and funded laboratory analysis of the samples for total nitrogen (TN) and total dissolved nitrogen (TDN).

## Methods

### Sampling and Analytical Methods

The field sampling and laboratory analysis methods have been documented in the approved Quality Assurance Project Plan (RFA #08082; NHEP, 2008). Ten municipal WWTFs were included in the study: Kittery ME, Berwick ME, South Berwick ME, Portsmouth NH, Newmarket NH, Somersworth NH, Durham NH, Rochester NH, Exeter NH, and Dover NH (Figure 1). Ten grab samples were collected from each WWTF over a year at approximately monthly intervals. The Water Quality Analysis Laboratory at the University of New Hampshire used USGS Method I-4650-03 (Alkaline persulfate digestion) and high temperature catalytic oxidation (Merriam et al., 1996) to determine the TN and TDN concentrations in samples, respectively. The instantaneous loads of nitrogen from each WWTF on the sampling dates were calculated from the measured TN concentrations and the daily average flows recorded on monthly operating reports.

### Quality Assurance Audit

Several quality control tests were planned in the QAPP (NHEP, 2008). The results of quality control samples have been summarized in Tables 1 and 2. All of the data quality objectives for the study were substantially met. The only deviations from the QAPP were that the WWTFs for Portsmouth NH and South Berwick ME were dropped from the study after it was learned that these WWTFs already test their effluent for TN.

During the quality assurance review of the data, the results for one sample were rejected. The effluent sample from the Durham WWTF on 7/9/08 had TN and TDN concentrations of 27 and 20.5 mg N/L, respectively. These concentrations were nearly 3 standard deviations from the mean values for this WWTF. All of the other samples from the Durham WWTF had concentrations less than 9.4 mg N/L for TN and 8.4 mg N/L for TDN. Given the large discrepancy between the 7/9/08 results and the other results from the Durham WWTF, the 7/9/08 results were considered outliers and were rejected. The discrepancy was probably caused by an unrepresentative sample of wastewater because it was only a grab sample.

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## Results and Discussion

The quality assured results for daily average flow, TN concentrations, TDN concentrations, and nitrogen loads for each WWTF are shown in Table 3. Figures 2-9 contain plots for each WWTF showing the TN and TDN concentrations over time, the TN and TDN concentrations versus flow, and the nitrogen load over time.

The purpose of this report is to publish the results from the NHEP sampling program for nitrogen in WWTF effluent. A detailed accounting of total nitrogen loads to the estuary from all sources (e.g., WWTFs, non-point sources, and atmospheric deposition) will be included in the 2009 State of the Estuaries Report. The State of the Estuaries Report will be prepared by the NHEP by October 2009. In the meantime, the following are some general observations which can be made based on the WWTF data:

- The average concentrations of TDN and TN in all the effluent samples were 13.1 and 17.8 mg N/L, respectively.
- The average TN concentration for different WWTFs ranged from 5 to 30 mg N/L. The WWTF with the lowest average TN concentration was Somersworth NH. The Rochester NH WWTF had the highest average TN concentration.
- For many of the WWTFs there was an inverse relationship between TN concentrations and flow. This relationship is probably due to dilution of sanitary wastewater by stormwater and infiltration.

## References

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- Bolster, C.H., Jones, S.H., and Bromley, J.M. 2003. Evaluation of Effects of Wastewater Treatment Discharge on Estuarine Water Quality. University of New Hampshire, Durham, NH. A final report to the NH Estuaries Project, Portsmouth, NH.  
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- Merriam, J.L, W.H. McDowell, and W.S. Currie. 1996. A high-temperature catalytic oxidation technique for determining total dissolved nitrogen. *Soil Science Society of America Journal* 60: 1050-1055.

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**Table 1: Summary of Quality Control Samples for Total Nitrogen**

| Data Quality Indicators | Measurement Performance Criteria                                | QC Sample and/or Activity Used to Assess Measurement Performance                                    | QC Sample Results  |
|-------------------------|---|---|--|
| Precision-Overall       | RPD < 30%   | Field Duplicates<br>(Two field samples collected at the same time)                                  | N=10<br>Ave RPD = 8.5%<br>Max RPD=46.3%<br>1 of 10 duplicate RPDs >30% <sup>1</sup>  |
| Precision-Lab           | RPD < 15%   | Lab Duplicates<br>(Two samples from same field sample run through all the lab processes separately) | N=26<br>Ave RPD = 6.5%<br>Max RPD = 27.9%<br>4 of 26 duplicate RPDs >15% <sup>2</sup><br>A total of 29 lab duplicates were run but three duplicates were not used because the concentrations were very low (<0.13 mg N/L) which inflated the RPDs for small differences. |
| Accuracy/Bias           | >85% and <115% recovery   | Certified Reference Material Samples<br>Laboratory Fortified Matrix Samples                         | N=34<br>Min % recovery = 85%<br>Max % recover = 104%   |
| Comparability           | Measurements should follow standard methods that are repeatable | NA  | Standard methods were followed for data collection and analysis  |
| Sensitivity             | Percent of censored data  | NA  | The minimum TN concentration in samples was 2.33 mg N/L. The method detection limit was 0.015 mg N/L. No results were censored.  |
| Data Completeness       | Valid data for 90% of planned samples (9 samples at each WWTF)  | Data Completeness Check   | At least 9 samples were collected from each WWTF.  |

1. Field duplicate that failed QC criteria was from the Somersworth WWTF on 5/5/08 with TN concentrations of 5.51 and 8.83 mg N/L.

2. Lab duplicates that failed QC criteria in mg N/L: 0.41/0.49 (17%), 0.36/0.46 (24%), 0.37/0.45 (19%), and 1.01/1.34 (28%).

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**Table 2: Summary of Quality Control Samples for Total Dissolved Nitrogen**

| Data Quality Indicators | Measurement Performance Criteria                                  | QC Sample and/or Activity Used to Assess Measurement Performance                                    | QC Sample Results  |
|-------------------------|---|---|--|
| Precision-Overall       | RPD < 30%   | Field Duplicates<br>(Two field samples collected at the same time)                                  | N=10<br>Ave RPD = 2.8%<br>Max RPD=8.8%   |
| Precision-Lab           | RPD < 15%   | Lab Duplicates<br>(Two samples from same field sample run through all the lab processes separately) | N=9<br>Ave RPD = 4.4%<br>Max RPD = 8.8%  |
| Accuracy/Bias           | >85% and <115% recovery   | Certified Reference Material Samples<br>Laboratory Fortified Matrix Samples                         | N=21<br>Min % recovery = 86%<br>Max % recover = 106%   |
| Comparability           | Measurements should follow standard methods that are repeatable   | NA  | Standard methods were followed for data collection and analysis  |
| Sensitivity             | Percent of censored data  | NA  | The minimum TDN concentration in samples was 2.13 mg N/L. The method detection limit was 0.1 mg N/L. No results were censored. |
| Data Completeness       | Valid data for 90% of planned samples<br>(9 samples at each WWTF) | Data Completeness Check   | At least 9 samples were collected from each WWTF.  |

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**Table 3: Total Nitrogen Concentrations in Effluent Samples from Wastewater Treatment Facilities**

| WWTF           | Date           | Time  | Effluent Flow<br>(MGD-daily ave) | TDN<br>(mg N/L) | TN<br>(mg N/L) | TN Load<br>(kg N/day) | TN Load<br>(lb N/day) | TN Load<br>(tons N/yr) | Comments |
|----------------|----------------|-------|----------------------------------|-----------------|----------------|-----------------------|-----------------------|------------------------|----------|
| Kittery        | 02/20/08       | 12:00 | 1.872                            | 8.713           | 10.082         | 71.445                | 157.508               | 28.685                 |          |
| Kittery        | 03/13/08       | 9:50  | 1.764                            | 8.016           | 8.779          | 58.618                | 129.229               | 23.535                 | Note 1   |
| Kittery        | 04/11/08       | 11:55 | 1.234                            | 10.084          | 12.219         | 57.079                | 125.837               | 22.917                 |          |
| Kittery        | 05/05/08       | 14:05 | 1.400                            | 8.322           | 14.257         | 75.558                | 166.574               | 30.336                 |          |
| Kittery        | 06/11/08       | 10:45 | 0.776                            | 18.872          | 27.284         | 80.145                | 176.687               | 32.178                 |          |
| Kittery        | 07/09/08       |       | 0.900                            |                 |                |                       |                       |                        | Note 5   |
| Kittery        | 08/14/08       | 11:10 | 1.050                            | 13.564          | 20.468         | 81.355                | 179.356               | 32.664                 |          |
| Kittery        | 09/12/08       | 9:55  | 1.151                            | 5.609           | 10.515         | 45.813                | 100.999               | 18.394                 |          |
| Kittery        | 10/06/08       | 10:30 | 1.005                            | 7.953           | 16.948         | 64.477                | 142.146               | 25.887                 |          |
| Kittery        | 11/04/08       | 12:25 | 0.895                            | 14.918          | 23.372         | 79.182                | 174.564               | 31.791                 |          |
| <b>Kittery</b> | <b>Average</b> |       | <b>1.205</b>                     | <b>10.672</b>   | <b>15.992</b>  | <b>72.926</b>         | <b>160.773</b>        | <b>29.280</b>          | Note 2   |
| Berwick        | 02/20/08       | 9:17  | 0.629                            | 2.268           | 2.333          | 5.555                 | 12.246                | 2.230                  |          |
| Berwick        | 03/13/08       | 10:32 | 0.645                            | 5.537           | 5.866          | 14.322                | 31.574                | 5.750                  |          |
| Berwick        | 04/11/08       | 9:40  | 0.586                            | 11.172          | 14.117         | 31.314                | 69.036                | 12.573                 | Note 1   |
| Berwick        | 05/05/08       | 11:00 | 0.502                            | 8.212           | 12.223         | 23.227                | 51.207                | 9.326                  |          |
| Berwick        | 06/11/08       | 9:50  | 0.338                            | 16.901          | 25.550         | 32.690                | 72.069                | 13.125                 |          |
| Berwick        | 07/09/08       | 12:25 | 0.400                            | 19.276          | 27.932         | 42.294                | 93.242                | 16.981                 |          |
| Berwick        | 08/14/08       | 11:40 | 0.421                            | 12.471          | 19.858         | 31.647                | 69.770                | 12.706                 |          |
| Berwick        | 09/12/08       | 10:30 | 0.371                            | 19.775          | 25.998         | 36.511                | 80.492                | 14.659                 |          |
| Berwick        | 10/06/08       | 11:10 | 0.322                            | 13.073          | 13.726         | 16.731                | 36.885                | 6.717                  |          |
| Berwick        | 11/04/08       | 11:25 | 0.269                            | 16.784          | 19.206         | 19.557                | 43.116                | 7.852                  |          |
| <b>Berwick</b> | <b>Average</b> |       | <b>0.448</b>                     | <b>12.547</b>   | <b>16.681</b>  | <b>28.307</b>         | <b>62.407</b>         | <b>11.365</b>          | Note 2   |
| Newmarket      | 02/20/08       | 13:13 | 1.020                            | 15.872          | 18.859         | 72.816                | 160.530               | 29.236                 |          |
| Newmarket      | 03/13/08       | 13:17 | 0.984                            | 17.468          | 20.089         | 74.829                | 164.969               | 30.044                 |          |
| Newmarket      | 04/11/08       | 12:45 | 0.781                            | 17.751          | 21.972         | 64.958                | 143.206               | 26.081                 |          |
| Newmarket      | 05/05/08       | 12:50 | 0.792                            | 20.425          | 33.108         | 99.259                | 218.827               | 39.853                 |          |

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| WWTF               | Date           | Time  | Effluent Flow<br>(MGD-daily ave) | TDN<br>(mg N/L) | TN<br>(mg N/L) | TN Load<br>(kg N/day) | TN Load<br>(lb N/day) | TN Load<br>(tons N/yr) | Comments |
|--------------------|----------------|-------|----------------------------------|-----------------|----------------|-----------------------|-----------------------|------------------------|----------|
| Newmarket          | 06/11/08       | 12:15 | 0.474                            | 29.871          | 42.890         | 76.957                | 169.659               | 30.898                 |          |
| Newmarket          | 07/09/08       | 10:30 | 0.427                            | 25.342          | 35.737         | 57.765                | 127.348               | 23.193                 |          |
| Newmarket          | 08/14/08       | 9:45  | 0.578                            | 11.055          | 19.456         | 42.568                | 93.846                | 17.091                 |          |
| Newmarket          | 09/12/08       | 9:00  | 0.538                            | 21.381          | 35.131         | 71.546                | 157.729               | 28.726                 | Note 1   |
| Newmarket          | 10/06/08       | 13:05 | 0.678                            | 18.950          | 43.297         | 111.122               | 244.981               | 44.616                 |          |
| Newmarket          | 11/04/08       | 10:00 | 0.532                            | 17.458          | 30.483         | 61.387                | 135.335               | 24.647                 | Note 1   |
| <b>Newmarket</b>   | <b>Average</b> |       | <b>0.680</b>                     | <b>19.557</b>   | <b>30.102</b>  | <b>77.531</b>         | <b>170.925</b>        | <b>31.129</b>          | Note 2   |
| Somersworth        | 02/20/08       | 9:35  | 2.230                            | 2.274           | 2.555          | 21.571                | 47.554                | 8.661                  |          |
| Somersworth        | 03/13/08       | 10:52 | 2.330                            | 4.139           | 4.608          | 40.643                | 89.602                | 16.318                 |          |
| Somersworth        | 04/11/08       | 10:00 | 2.300                            | 2.134           | 2.455          | 21.372                | 47.117                | 8.581                  |          |
| Somersworth        | 05/05/08       | 10:45 | 2.070                            | 5.292           | 7.172          | 56.199                | 123.897               | 22.564                 | Note 1   |
| Somersworth        | 06/11/08       | 10:10 | 1.670                            | 4.495           | 5.151          | 32.564                | 71.790                | 13.074                 |          |
| Somersworth        | 07/09/08       | 12:15 | 1.270                            | 6.126           | 6.365          | 30.600                | 67.460                | 12.286                 |          |
| Somersworth        | 08/14/08       | 12:00 | 1.620                            | 3.000           | 3.689          | 22.623                | 49.875                | 9.083                  |          |
| Somersworth        | 09/12/08       | 10:45 | 1.780                            | 3.692           | 4.242          | 28.580                | 63.009                | 11.475                 |          |
| Somersworth        | 10/06/08       | 11:20 | 1.920                            | 6.672           | 6.942          | 50.456                | 111.236               | 20.258                 |          |
| Somersworth        | 11/04/08       | 11:40 | 1.550                            | 5.662           | 6.366          | 37.351                | 82.344                | 14.996                 |          |
| <b>Somersworth</b> | <b>Average</b> |       | <b>1.874</b>                     | <b>4.349</b>    | <b>4.955</b>   | <b>35.147</b>         | <b>77.485</b>         | <b>14.111</b>          | Note 2   |
| Durham             | 02/20/08       | 11:00 | 1.780                            | 7.425           | 9.359          | 63.062                | 139.027               | 25.320                 |          |
| Durham             | 03/13/08       | 12:48 | 1.790                            | 7.358           | 7.587          | 51.411                | 113.341               | 20.642                 |          |
| Durham             | 04/11/08       | 11:25 | 1.410                            | 6.410           | 6.697          | 35.745                | 78.803                | 14.352                 |          |
| Durham             | 05/05/08       | 12:25 | 1.190                            | 5.024           | 5.899          | 26.572                | 58.580                | 10.669                 |          |
| Durham             | 06/11/08       | 11:45 | 0.480                            | 7.262           | 7.375          | 13.400                | 29.542                | 5.380                  |          |
| Durham             | 07/09/08       | 10:05 | 0.610                            |                 |                |                       |                       |                        | Note 3   |
| Durham             | 08/14/08       | 9:15  | 0.850                            | 8.401           | 8.375          | 26.948                | 59.409                | 10.820                 | Note 1   |
| Durham             | 09/12/08       | 12:45 | 0.970                            | 5.722           | 6.738          | 24.742                | 54.546                | 9.934                  |          |
| Durham             | 10/06/08       | 12:45 | 1.220                            | 7.698           | 9.032          | 41.709                | 91.952                | 16.746                 |          |

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| WWTF             | Date           | Time  | Effluent Flow<br>(MGD-daily ave) | TDN<br>(mg N/L) | TN<br>(mg N/L) | TN Load<br>(kg N/day) | TN Load<br>(lb N/day) | TN Load<br>(tons N/yr) | Comments |
|------------------|----------------|-------|----------------------------------|-----------------|----------------|-----------------------|-----------------------|------------------------|----------|
| Durham           | 11/04/08       | 13:20 | 1.140                            | 7.216           | 7.608          | 32.830                | 72.376                | 13.181                 |          |
| <b>Durham</b>    | <b>Average</b> |       | <b>1.144</b>                     | <b>6.946</b>    | <b>7.630</b>   | <b>33.042</b>         | <b>72.844</b>         | <b>13.266</b>          | Note 2   |
| Rochester        | 02/20/08       | 10:08 | 4.817                            | 17.785          | 20.356         | 371.186               | 818.316               | 149.031                |          |
| Rochester        | 03/13/08       | 11:43 | 5.585                            | 16.957          | 17.031         | 360.056               | 793.780               | 144.563                |          |
| Rochester        | 04/11/08       | 10:30 | 7.212                            | 13.755          | 13.511         | 368.858               | 813.184               | 148.096                |          |
| Rochester        | 05/05/08       | 11:35 | 5.430                            | 16.428          | 20.933         | 430.269               | 948.571               | 172.753                |          |
| Rochester        | 06/11/08       | 9:20  | 3.230                            | 34.699          | 44.443         | 543.394               | 1197.967              | 218.173                | Note 1   |
| Rochester        | 07/09/08       | 11:40 | 3.132                            | 42.093          | 54.973         | 651.754               | 1436.858              | 261.679                |          |
| Rochester        | 08/14/08       | 12:30 | 6.166                            | 20.652          | 29.226         | 682.169               | 1503.910              | 273.891                |          |
| Rochester        | 09/12/08       | 11:20 | 4.635                            | 26.272          | 29.200         | 512.326               | 1129.473              | 205.699                |          |
| Rochester        | 10/06/08       | 11:50 | 3.967                            | 29.128          | 29.589         | 444.324               | 979.558               | 178.396                |          |
| Rochester        | 11/04/08       | 12:05 | 3.200                            | 29.264          | 41.858         | 507.038               | 1117.817              | 203.576                |          |
| <b>Rochester</b> | <b>Average</b> |       | <b>4.737</b>                     | <b>24.704</b>   | <b>30.112</b>  | <b>539.998</b>        | <b>1190.480</b>       | <b>216.809</b>         | Note 2   |
| Exeter           | 02/20/08       | 12:28 | 4.300                            | 13.743          | 18.171         | 295.770               | 652.055               | 118.752                |          |
| Exeter           | 03/13/08       | 13:35 | 2.600                            | 12.029          | 14.031         | 138.091               | 304.436               | 55.444                 |          |
| Exeter           | 04/11/08       | 12:30 | 2.700                            | 9.672           | 12.590         | 128.681               | 283.689               | 51.665                 |          |
| Exeter           | 05/05/08       | 13:15 | 2.600                            | 11.270          | 20.814         | 204.849               | 451.610               | 82.247                 |          |
| Exeter           | 06/11/08       | 12:45 | 1.300                            | 19.252          | 31.046         | 152.780               | 336.818               | 61.341                 |          |
| Exeter           | 07/09/08       | 10:50 | 0.700                            | 11.658          | 10.582         | 28.040                | 61.817                | 11.258                 |          |
| Exeter           | 08/14/08       | 10:00 | 2.000                            | 6.600           | 7.595          | 57.498                | 126.761               | 23.086                 |          |
| Exeter           | 09/12/08       | 9:30  | 1.800                            | 5.018           | 7.230          | 49.262                | 108.604               | 19.779                 |          |
| Exeter           | 10/06/08       | 9:50  | 1.800                            | 4.502           | 5.740          | 39.112                | 86.227                | 15.704                 | Note 1   |
| Exeter           | 11/04/08       | 10:25 | 1.300                            | 10.353          | 16.540         | 81.392                | 179.437               | 32.679                 |          |
| <b>Exeter</b>    | <b>Average</b> |       | <b>2.110</b>                     | <b>10.410</b>   | <b>14.434</b>  | <b>115.286</b>        | <b>254.160</b>        | <b>46.287</b>          | Note 2   |
| Dover            | 02/20/08       | 10:41 | 4.690                            | 9.292           | 11.188         | 198.625               | 437.888               | 79.748                 |          |
| Dover            | 03/13/08       | 12:25 | 4.290                            | 12.223          | 13.205         | 214.439               | 472.753               | 86.097                 |          |

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| WWTF                          | Date           | Time  | Effluent Flow<br>(MGD-daily ave) | TDN<br>(mg N/L) | TN<br>(mg N/L) | TN Load<br>(kg N/day) | TN Load<br>(lb N/day) | TN Load<br>(tons N/yr) | Comments  |
|-------------------------------|----------------|-------|----------------------------------|-----------------|----------------|-----------------------|-----------------------|------------------------|-----------|
| Dover                         | 04/11/08       | 11:00 | 3.540                            | 13.986          | 16.898         | 226.434               | 499.197               | 90.913                 |           |
| Dover                         | 05/05/08       | 12:05 | 3.650                            | 9.558           | 19.128         | 264.285               | 582.643               | 106.111                |           |
| Dover                         | 06/11/08       | 11:30 | 2.160                            | 25.299          | 37.556         | 307.071               | 676.969               | 123.289                |           |
| Dover                         | 07/09/08       | 9:45  | 1.960                            | 20.239          | 28.627         | 212.394               | 468.244               | 85.276                 | Note 1    |
| Dover                         | 08/14/08       | 13:00 | 3.020                            | 15.283          | 24.578         | 280.969               | 619.423               | 112.809                |           |
| Dover                         | 09/12/08       | 11:50 | 2.810                            | 17.038          | 26.204         | 278.731               | 614.491               | 111.911                |           |
| Dover                         | 10/06/08       | 12:20 | 2.880                            | 12.800          | 20.011         | 218.158               | 480.952               | 87.591                 |           |
| Dover                         | 11/04/08       | 12:40 | 2.340                            | 17.400          | 25.954         | 229.896               | 506.829               | 92.303                 |           |
| <b>Dover</b>                  | <b>Average</b> |       | <b>3.134</b>                     | <b>15.312</b>   | <b>22.335</b>  | <b>264.967</b>        | <b>584.146</b>        | <b>106.384</b>         | Note 1, 4 |
| Portsmouth                    | 02/20/08       | 8:37  | 9.095                            | 6.549           | 8.278          | 284.999               | 628.309               | 114.427                | Note 1    |
| <b>Average of all samples</b> |                |       |                                  | <b>13.09</b>    | <b>17.81</b>   |                       |                       |                        |           |

Note 1. Average of two field duplicate samples.

Note 2: Average load is calculated from the average flow and average TN concentration.

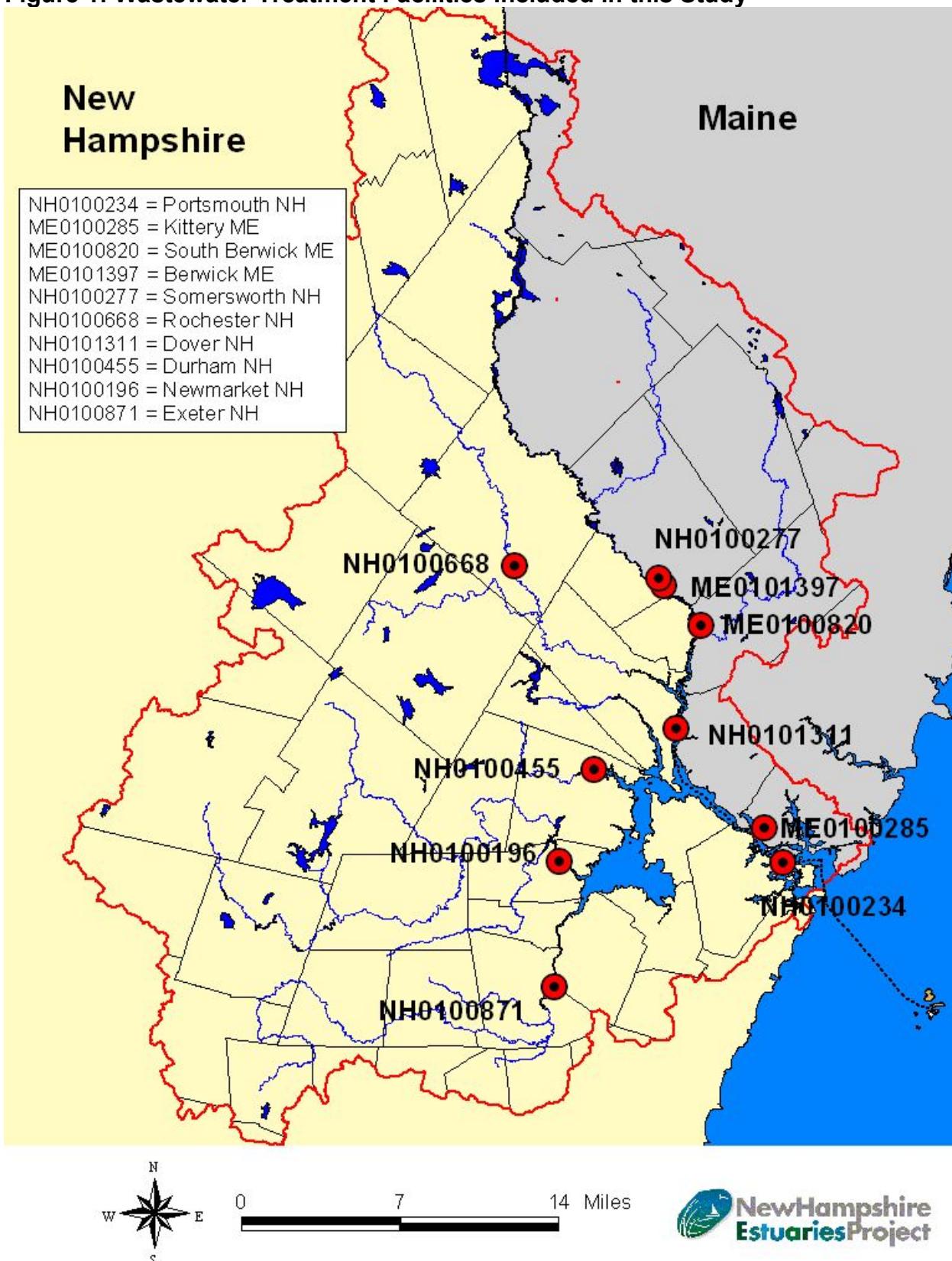
Note 3: Lab results for the sample (TDN=20.546 and TN=27.115) were rejected. These values were >2.7 standard deviations from the mean. They were obvious anomalies and were rejected during the quality assurance audit.

Note 4: Only one sample was collected at the Portsmouth WWTF. After the 2/20/08 sampling round, DES learned that this facility already tests its effluent for TN. Therefore, no additional samples were collected.

Note 5: The 7/9/08 sample was not collected at the Kittery WWTF because the decant discharge times at this facility did not fit with the rest of the sampling schedule.

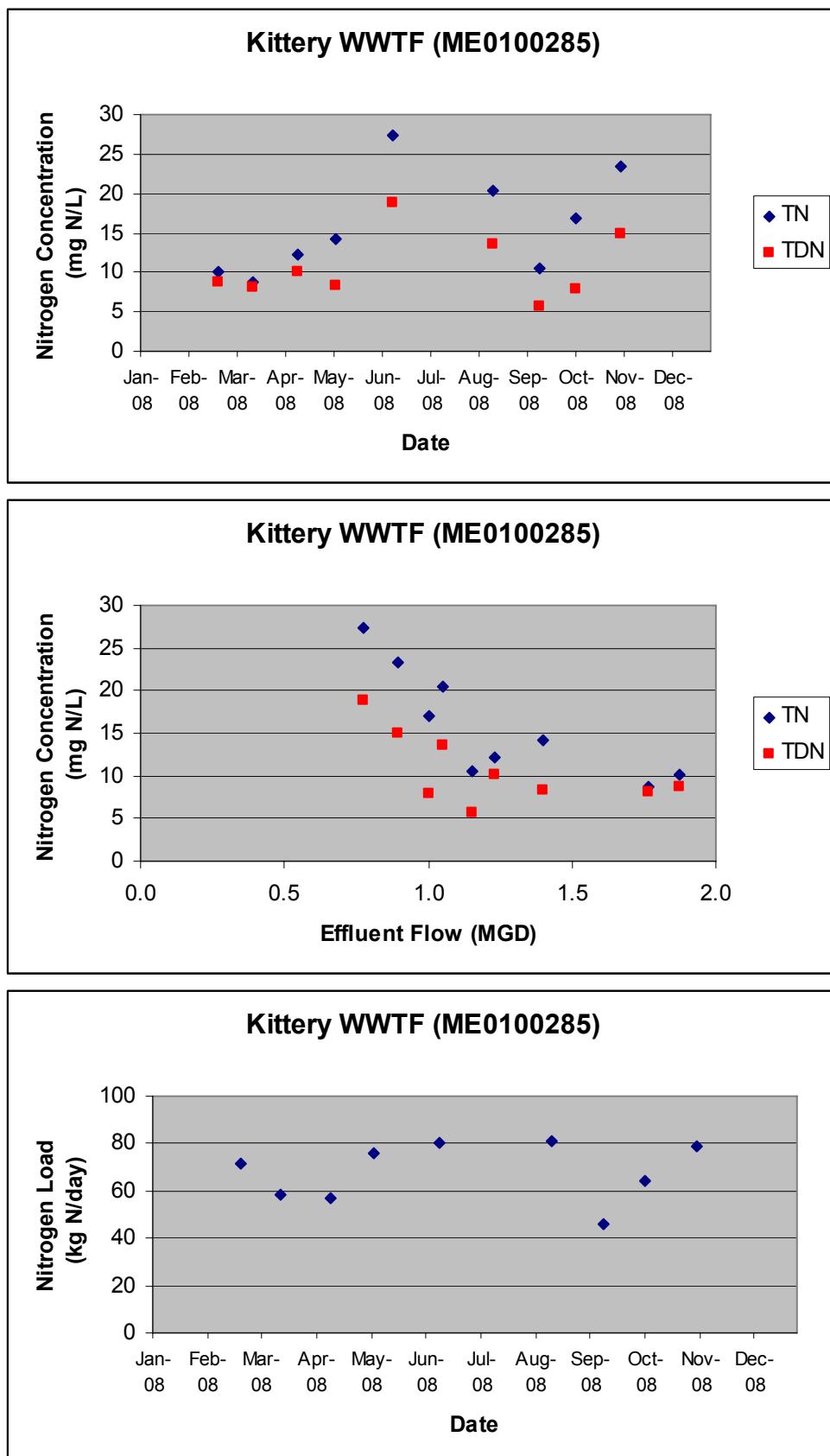
# EXHIBIT 25 (AR K.18)

Figure 1: Wastewater Treatment Facilities Included in this Study



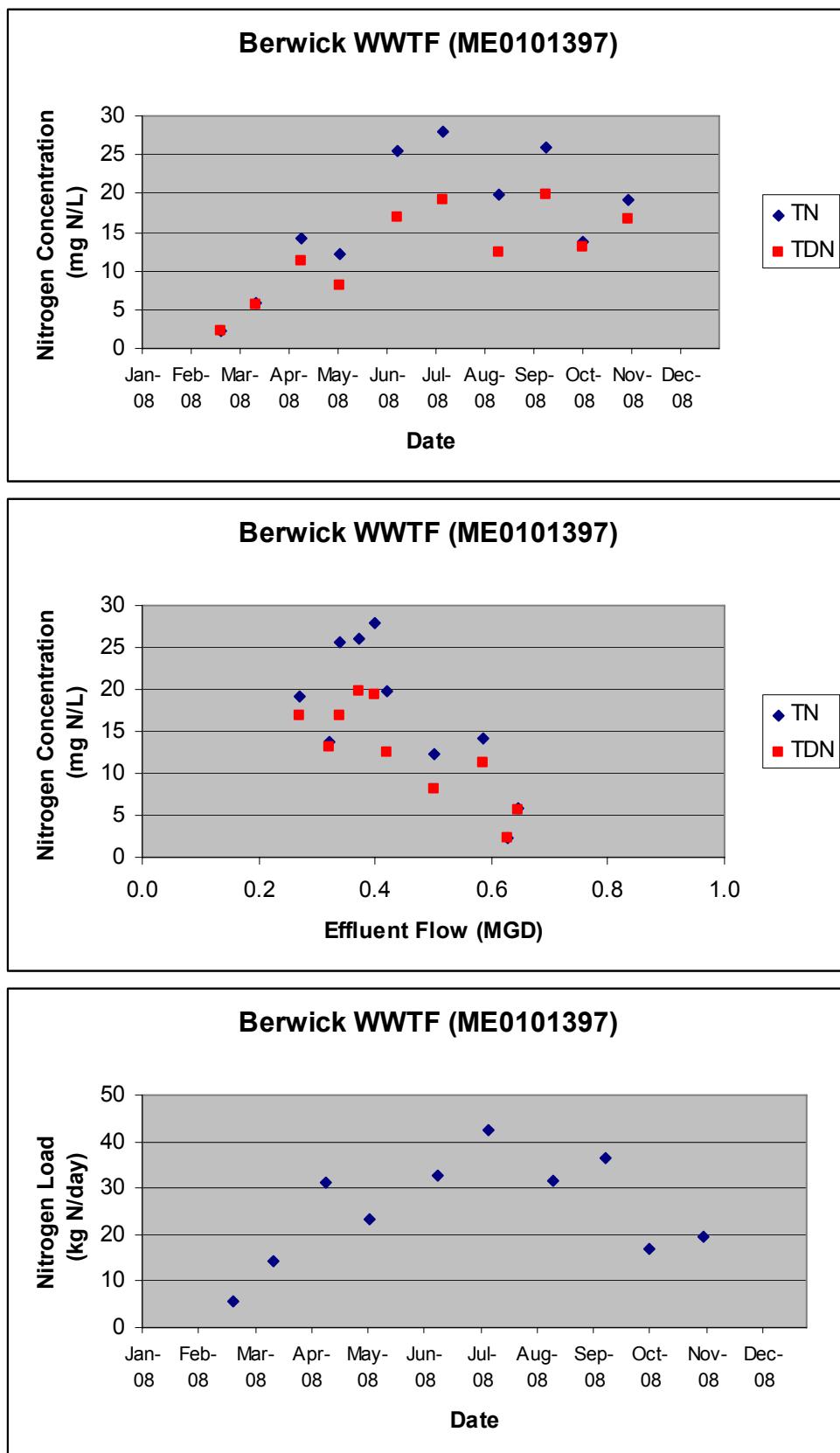
# EXHIBIT 25 (AR K.18)

Figure 2



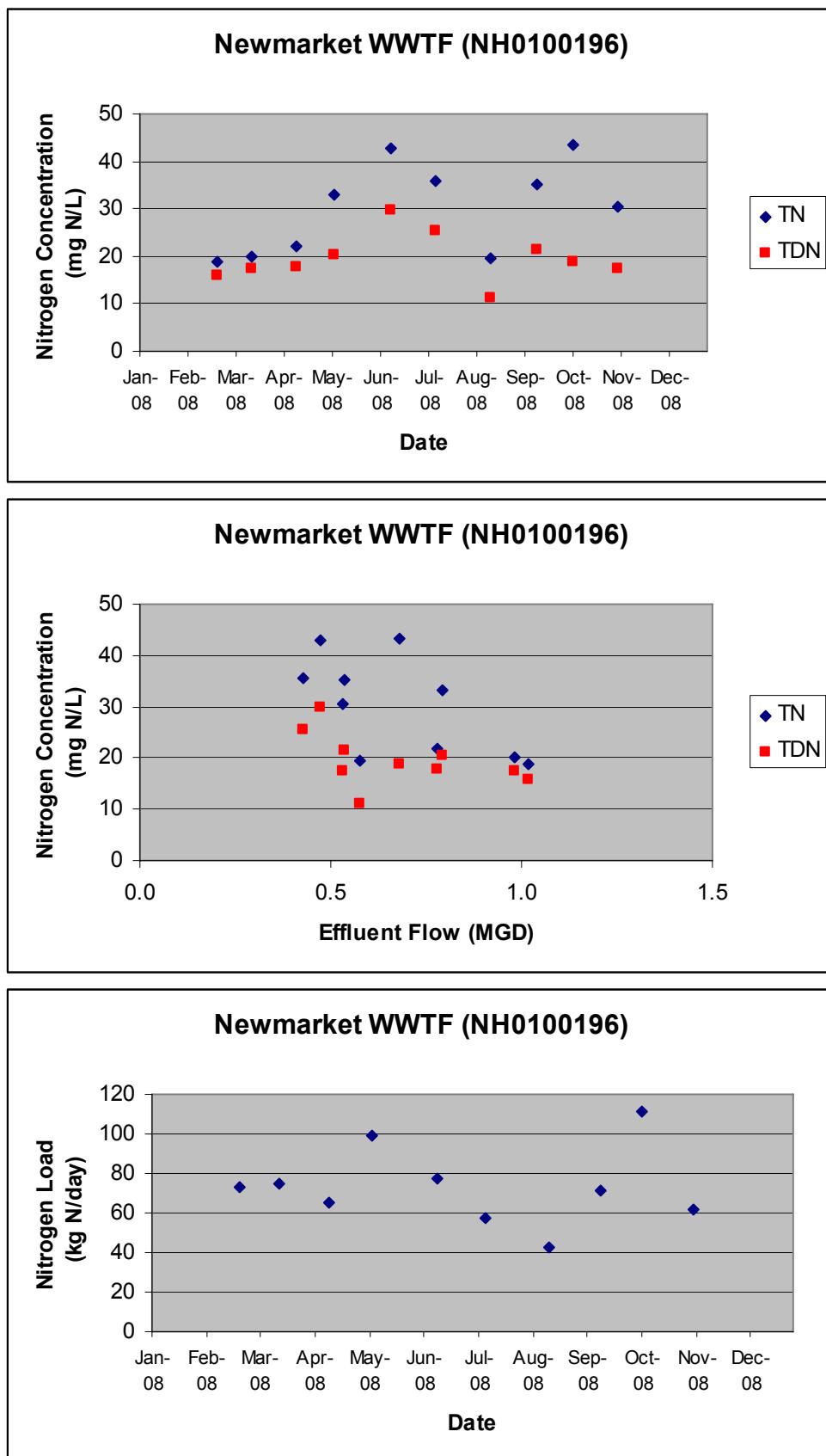
# EXHIBIT 25 (AR K.18)

Figure 3



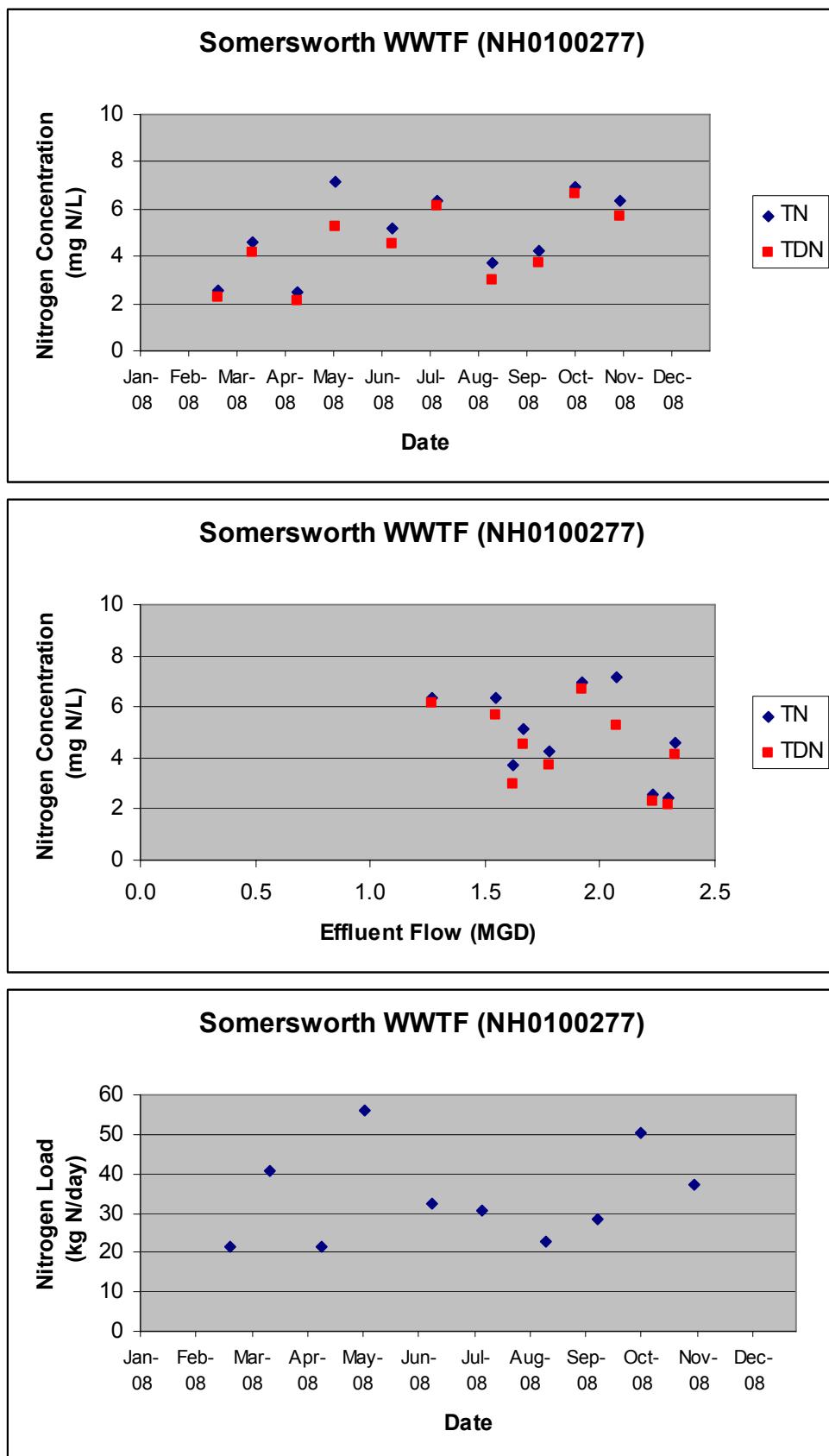
# EXHIBIT 25 (AR K.18)

Figure 4



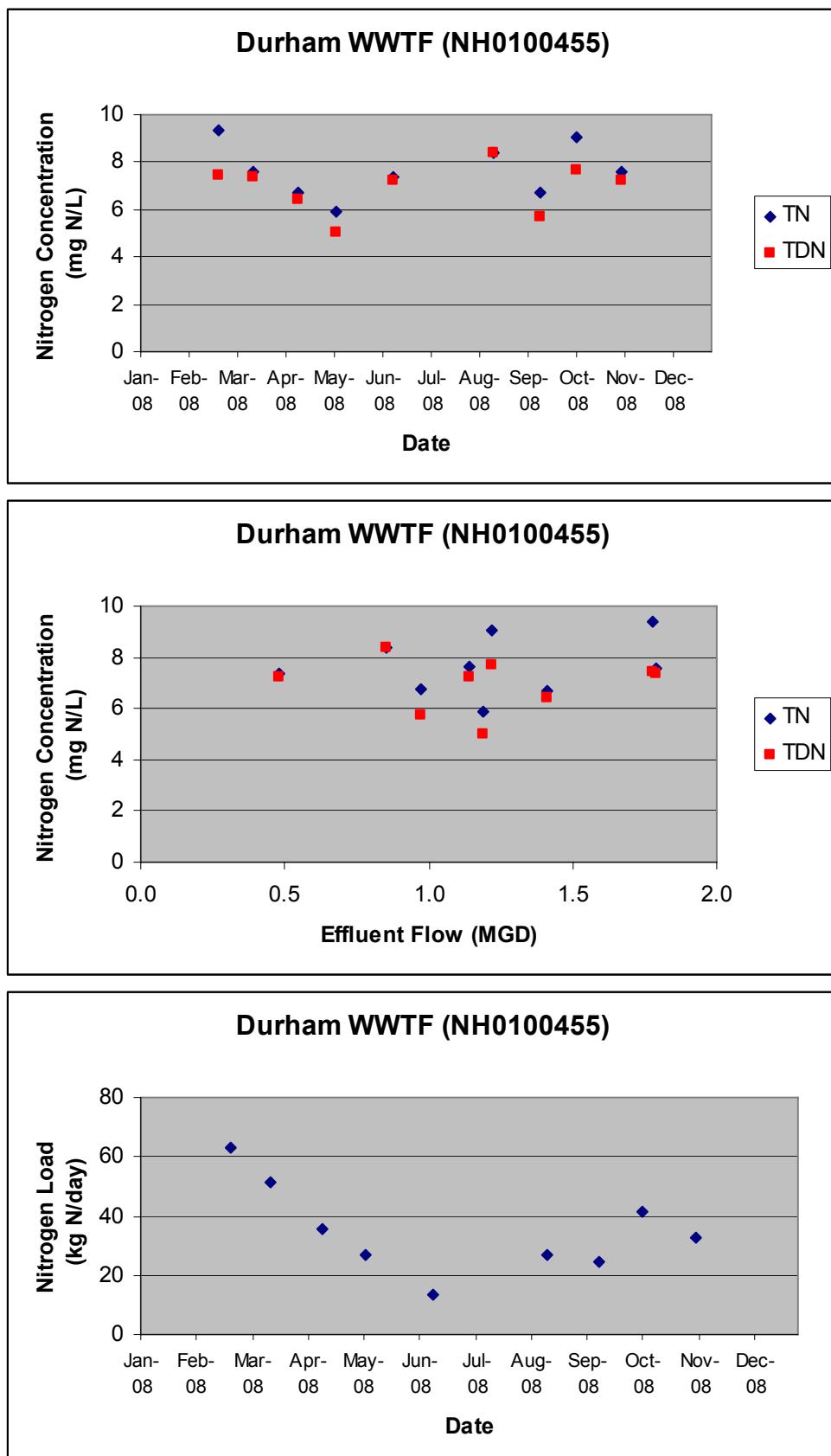
# EXHIBIT 25 (AR K.18)

Figure 5



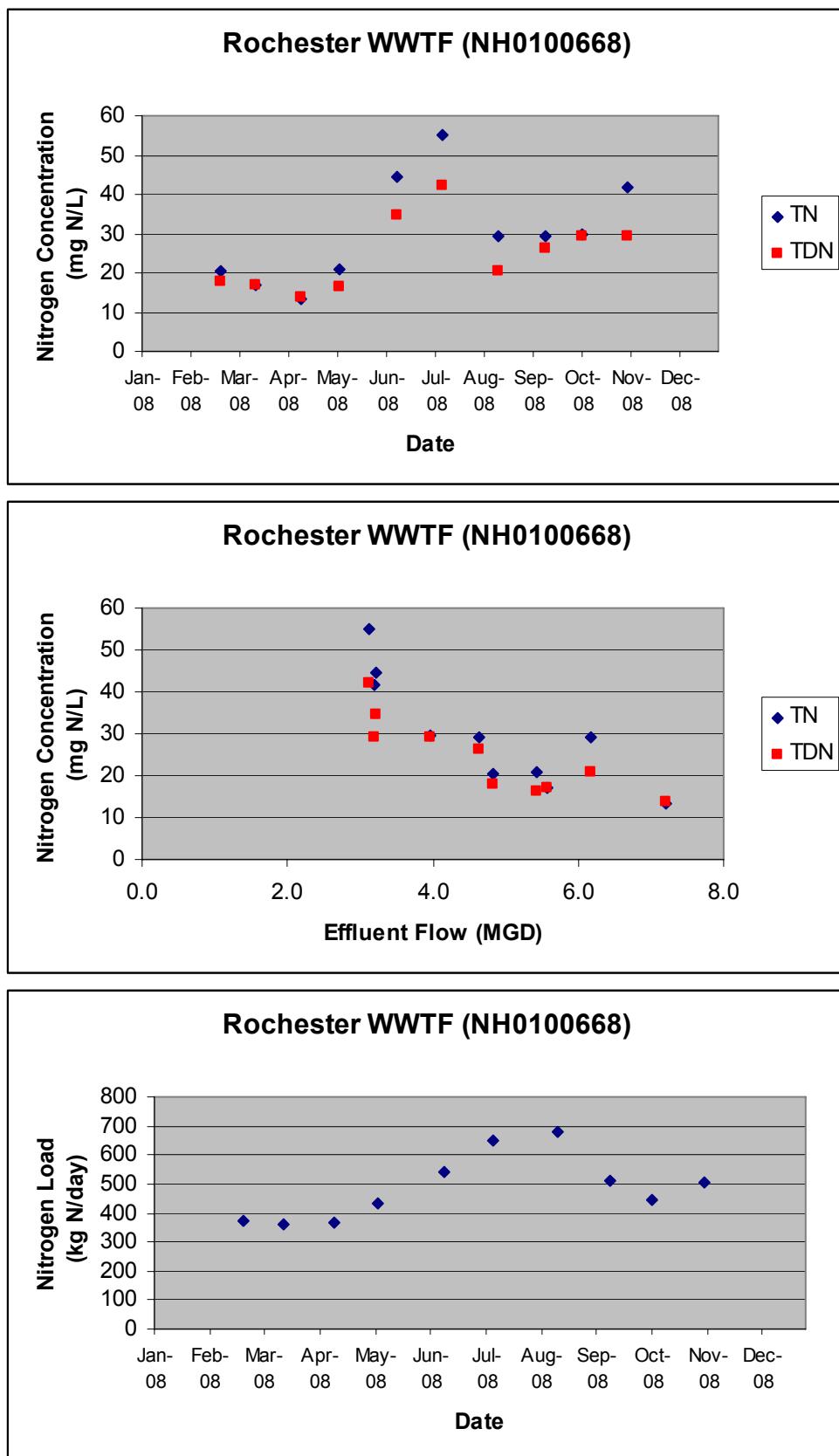
# EXHIBIT 25 (AR K.18)

Figure 6



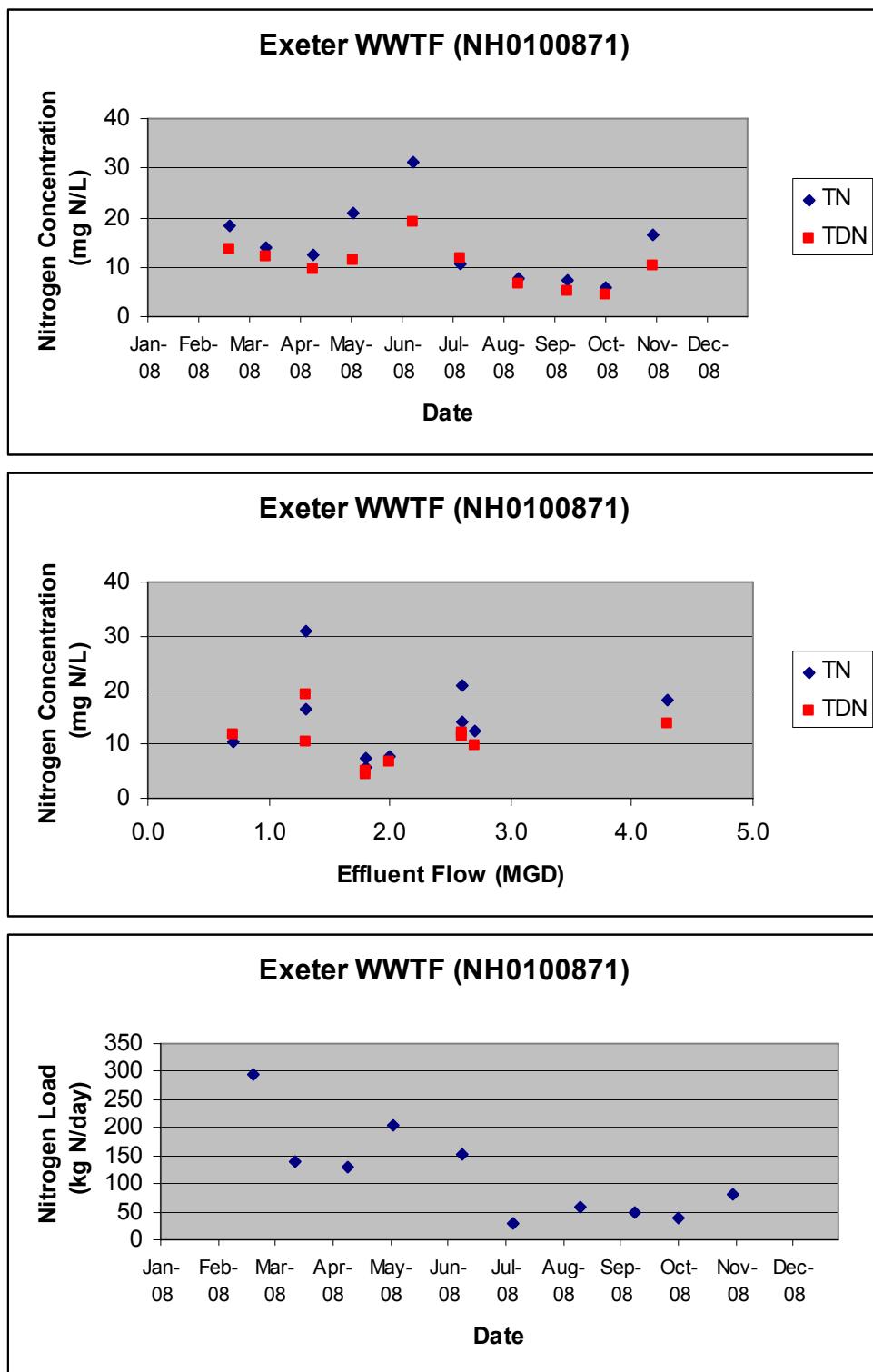
# EXHIBIT 25 (AR K.18)

Figure 7



# EXHIBIT 25 (AR K.18)

Figure 8



# EXHIBIT 25 (AR K.18)

Figure 9

