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REPORT OF THE NPDES SUBCOMMITTEE

Committee Agenda

- ① Top priority: Ensure that all Ohio River discharges are on notice regarding new effective date for mixing zone prohibition.
 - ORSANCO made written notice of 2013 standards revisions.
 - Proposing to use IDEM letter as model.
 - Needs to include statement about options:
 - Seek variance from ORSANCO.
 - Proposing that each state send similar letter to their discharges.

Streamlined Mercury Variance Procedure

- Committee recommended general approach at last TEC meeting.has been working on procedure for streamlined variance.
- TEC referred the proposed approach to the Standards Committee.
- Recommend that NPDES should work with Standards Committee on development of specific process.

Proposed General Approach

- Require low-level mercury monitoring to determine reasonable potential.
- If Hg discharge < 12 ng/L as annual average (criterion is 12 ng/L) and an acceptable pollutant minimization plan has been submitted, then a streamlined variance can be granted.
- All other conditions & procedures remain as in the currently adopted Variance Process.
- This approach similar to OEPA.

Continuing Issues

- ⦿ Permitting of discharges for TDS & Ammonia that apply at downstream intakes.
- ⦿ Work with Power industry on development of implementation language for human health temperature criterion.

TEC Consideration

- Recommendation that states send letter to Ohio River discharges regarding mixing zone prohibition and obtaining variance from ORSANCO.
- Recommendation that NPDES work with Standards Committee on streamlined mercury variance.