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# REPORT OF THE NPDES SUBCOMMITTEE

# Committee Agenda

- ⦿ Subcommittee met on January 14, 2015.
- ⦿ 6 states and EPA Region 5 represented.
- ⦿ Agenda:
  - The subcommittee reviewed all of the proposed standards revisions.
    - BCC MZ Elimination
    - Total Hg WQC
    - TDS
    - New Ammonia Criteria
    - HH Temperature Criteria

# Proposed Revisions

- ◎ Mixing Zone Prohibition for BCCs
  - October 16, 2015 effective date replaced with
  - “as soon as practicable” ... “as determined by the permitting authority” ... “considering the following criteria:”
    - Mercury minimization measures
    - Concentration and duration of the discharge, bioaccumulation factors and exposure considerations
  - “as determined by the permitting authority” each State needs to develop implementation guidance for
    - ‘as soon as practicable’ – economic and technical feasibility of eliminating MZ
    - acceptable “mercury minimization procedures”
    - ‘discharger loads and environmental impacts’ - what criteria to use/site specific study needed?
  - Unclear decision criteria and greater opportunity for permit appeals due to inconsistency among States

# Proposed Revisions

## ● Total Mercury Water Quality Criterion

- Subcommittee recommends use of some averaging period instead of “not to exceed” currently in use for Hg Discharges to Ohio River

## ● TDS

- Subcommittee has no concerns with continued use of the TDS criteria
  - Previously recommended a methodology for permitting TDS which applies at downstream intake.
    - Utilize a mixing model for new discharges or when concentrations approach 500 mg/L.

# Proposed Revisions (cont.)

- ◎ New Ammonia Criteria Proposal (USEPA National Recommended Criteria – more stringent than current criteria).
  - IN has two discharges – small sewage plants(lagoon/septic design) with difficulty meeting new criteria.
  - IL, PA no issue with facilities meeting limit
  - WV – evaluating impact on facilities
  - Modeling implementation procedures impact whether new criteria will be a compliance issue
- ◎ Temperature Criterion
  - No changes proposed to numeric value of 110 deg F.
  - IL indicated it may have power plant discharge with difficulty meeting criteria.

Questions??