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# REPORT OF THE NPDES SUBCOMMITTEE

# Committee Agenda

- Streamlined mercury variance procedure.
- Updated mercury discharge list.
- Letters to discharges regarding MZ prohibition.
- BPJ/BAT limits for discharges of FGD landfill leachate.
- Procedures for permitting TDS & ammonia that apply at downstream intakes.

# Streamlined Mercury Variance Procedure

- Streamlined Variance Procedure Developed and Forwarded to PCS
- PCS Committee has opted not to propose a streamlined procedure at this time.
- Streamlined procedure may be necessary after October 2015 based on the reasonable potential that exists for Ohio River discharges of BCCs.
  - 'average' vs 'not to exceed'

# Proposed Streamlined Mercury Variance

- 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.

## States' Letters to Discharges on MZ Prohibition

- TEC recommended that states notify Ohio River discharges of new effective date of MZ prohibition and means to obtain variance.
- IN only state to have done this.
- PA believes letter should come from ORSANCO.
- Less need for variances of discharges given mercury limits of 0.012 ug/L as annual average.

# BPJ/BAT Limits for FGD Landfill Leachate

- ⦿ FGD landfills reasonable potential discharge Hg in leachate
- ⦿ AEP Gavin FGD landfill BAT/BPJ
  - Ferric chloride+organosulfide+polymer
  - Vertical Flow Wetlands
- ⦿ 12 ppt monthly average

# Permitting of Criteria that Apply at Intakes

- Utilize normal state permitting procedure if no problems for TDS or ammonia at downstream intake.
- If discharge  $>$  criterion or intake is in close proximity to discharge (1-2 miles), then use MZ calculation or model at 10% of 7Q10 low flow.

Questions??