

# **ORSANCO**

## **Pollution Control**

### **Standards**

# This Review: An Expedited Review

- Limited number of issues
- Compressed time schedule
- Objective is to adopt revisions in October, 2010
- Something new – we've never done this before.

# “Expedited” Review Process

- Initial Comment Period (February – April)
- Consideration of comments received; development of proposed revisions. (May-June)
- Public Review of Proposed Revisions (July-August)
- Commission Action on Proposed Revisions (October 14)

# Why an Expedited Review?

- Clarification for Permit Writers
  - Implementation of new ammonia criterion
- Correction of Oversights
  - No critical river flow specified for several constituents
- Address Emerging Developments
  - Better science for Selenium
  - Incidents of high TDS
  - Discharges from FGD units

# Four Issues for Consideration

- Critical Flow for Human Health Criteria
- Total Dissolved Solids Criteria
- Selenium Criteria
- Variances to Mixing Zone Requirements

# Critical Flow for Human Health Criteria

- Critical Flows Are Established for Certain Criteria in Section IV.C.4
- No Critical Flows Are Specified for Criteria in Sections IV.C.1,2 and 3
- Criteria include Bacteria, metals, Nitrate, Chloride, Sulfate, Radionuclides.
- States typically use 7Q10 as critical flows for these criteria.

# Proposed Change

- Move designation of critical flows to section IV.C.6.
  - This means that specified flows pertain to all criteria in Section IV.C.
- Specify HMF for carcinogens, 7Q10 for other constituents.



# Total Dissolved Solids Criteria

- TDS Criteria were included in the ORSANCO Standards in 1984:
  - 500 mg/L monthly average
  - 750 mg/L maximum
- TDS Criteria were dropped in 1993 revisions.
- Incidents of high TDS levels in the Monongahela River in recent years raise renewed concern about upper river concentrations.



# Proposed Revision

- Establish a new subsection IV.D for Taste and Odor and Industrial Use Protection.
- Add TDS criterion of 500 mg/L to apply at 7Q10.

# Selenium Criteria

- Current Selenium Criteria are considered outdated.
- States have been reluctant to delete criteria without replacement.
- US EPA is said to be close to issuing new criteria.
- ORSANCO and its member states will need to determine if new EPA criteria are appropriate for the Ohio River.

# Proposed Revision

- None at this time.
- When US EPA issues new criteria, Section IV.D. can be utilized to apply them.
- This issue will be revisited in the next review.

# Variances to Mixing Zone Requirements

- Section VIII provides for variances to Section V – Waste Water Discharge Requirements
- Uses must be maintained and Water Quality Criteria must be met
- Variance must be approved by state where discharge occurs and states whose waters might be affected.
- Variances can be granted only for the life of the permit.

# Variances to Mixing Zone Requirements

- Variances to Section VI- Mixing Zone Requirements – are not currently available.
- Some dischargers contend that treatment technology to meet Section VI.G (elimination of mixing zones for Bioaccumulative Chemicals of Concern) does not currently exist.

# Bioaccumulative Chemicals of Concern

- Lindane
- Mirex
- Hexachlorocyclohexane
- Hexachlorobenzene
- alpha-Hexachlorocyclohexane
- Chlordane
- beta-Hexachlorocyclohexane
- DDD
- delta-Hexachlorocyclohexane

# Bioaccumulative Chemicals of Concern

- DDT
- Hexachlorobutadiene
- DDE
- Photomirex
- Octachlorostyrene
- 1,2,4,5-Tetrachlorobenzene
- PCBs
- Toxaphene



# Bioaccumulative Chemicals of Concern

- 2,3,7,8-TCDD
- Pentachlorobenzene
- Mercury
- 1,2,3,4-Tetrachlorobenzene
- Dieldrin

# The Proposed Change

- Add the words "or Section VI" to Section VIII.A.
- Current requirements of Section VIII would continue to apply.
- Requests for Variances would be considered on a case by case basis.

# Additional Requirements to be considered for a variance based on limits of available technology

- Additional requirements or conditions for variances are proposed:
  - Consideration of alternatives, including elimination of the discharge.
  - Determination of effluent limits that can be achieved.
  - Opportunity for public review and comment.

# Question for Discussion: Need for Implementation Guidance

- Procedures Document?
- Part of, or supplemental to, Commission Standards?

# Issues Identified for Consideration in Next Review

- Selenium Criteria
- Critical Flow for Aquatic Life Protection
- Criteria for Brominated Chemicals
- Temperature for human health protection

...and of course:

- Wet Weather
- Nutrients
- Temperature for Aquatic Life Protection

# Questions?

