

Report of the NPDES Subcommittee





Agenda for May 15 Call

- Permitting procedures for criteria that apply at drinking water intakes.
- ACWA Permitting & Compliance Committee.
- Nutrient Discharge Monitoring Requirements.
- FGD Discharges
 - Ohio River inventory
 - ORSANCO FGD monitoring project
 - NPDES monitoring requirements
 - Update on EPA's effluent guidelines
 - Proposed study to evaluate correlations of Ohio River mercury levels & with respect to locations of FGD discharges.

Permitting Procedures for Criteria that Apply at Intakes

- IN, KY & OH have similar approaches for TDS.
 - Toxicity limits would control discharges of TDS.
 - Use of mixing model where intake is in very close proximity.
- WV use mixing model – CORMIX; criteria to be met ½ mi upstream of intake.
- PA – Policy & Procedure for NPDES Permitting of Discharges of TDS.
- USEPA – procedure in TSD.

Permitting Procedure (cont.)

- Committee recommends ORSANCO develop a common procedure.
- Will be reviewing EPA TSD procedure.
- Develop a set of criteria that will ensure consistency among the states.
 - But not a specific procedure.
 - States have their own procedures.
- Present to NPDES Committee at next meeting with ultimate signoff by TEC.

ACWA Permitting & Compliance Committee

- EPA/states MOA on NPDES programs to be updated in 2014.
- EPA developing WET Analysis Spreadsheet.
- EPA developing permit writers guide for nutrients.
- ACWA seeking state input on these & other issues.
- Peter has solicited states' participation.

Nutrients Discharge Monitoring

- States had agreed thru ORSANCO to quarterly nutrients monitoring for at major WWTPs.
- Region 5 reports that states have agreed to minimum monthly requirements.

Ohio River Discharges with Nutrients Monitoring Requirements

	No. of Municipal WWTPs	No. of Industrials
IL	1	2
IN	19	13
KY	30	43
OH	32	21
PA	8	5
Total	90	84

** WV not in system, but reports requiring either monthly or quarterly monitoring based on BPJ.

Inventory of FGD Discharges

- Completed inventory of coal-fired electric power generating facilities.
 - 36 Ohio River plants
 - 24 have FGDs.
 - 6 will be closing.
 - 1 under construction, 1 planned construction, 2 uncertain, 2 unknown
 - 2 are dry process – no wastewater.
 - How many have mercury monitoring; how many have limits.

FGD Monitoring Project

- 4 facilities are:
 - Cardinal, OH, ORM76
 - Mitchell, WV, ORM112
 - Mountaineer, WV, ORM 242
 - Clifty Creek, IN, ORM 560
- Monitoring program is:
 - Quarterly
 - Influent, FGD effluent, Ash Pond Final effluent
- Hg, Se, Br, TDS
- Completed Feb, 2013

FGD Discharge Hg Monitoring

- Agreed to at October 2007 TEC Mtg:
 - Monthly Hg monitoring FGD discharges influent & effluent.
 - Ash pond Hg monitoring quarterly if no RP/monthly if RP.
 - Reduce to quarterly if 2 years of data show little variability.

USEPA Effluent Guidelines for Coal Fired Electric Power Generating Facilities

- Originally proposed for July, 2012.
- Undecided but may delay until Nov 2012.
- Final scheduled for Apr 2014.

Subcommittee Recommendation

- Evaluate temporal & longitudinal trends in Ohio River Hg concentrations in relation to the when and where FGDs came on line.
- Next Mtg: Mid-August