Message

From: Hales, Dana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D18193CD39504DFD923A124DDE2C6240-WALKER, DANA]
Sent: 3/19/2021 1:09:10 AM
To: Abraham, Sara Reji [saabraham@pa.gov]
CC: Patel, Pravin [prpatel@pa.gov]; Martinsen, Jessica [Martinsen.Jessica@epa.gov]
Subject: RE: [External] PA0244449 Marcus Hook Generating Station

Sara,

My sincere apologies, but I think this response to our comments became buried in my inbox, as I do not recall seeing it or responding to it. Thank you for responding, and I have one follow up comment:

1. Comment/response to 1.a – with regards to 40 CFR 423.13(a) and 423.12(b)(2), the requirement for no discharge of PCBs needs to be included in the permit as it is a technology-based requirement of the Steam Electric ELG. I do understand the rationale, however, behind the facility's assertion that its only source of PCBs is from the river intake water and that it is not discharging PCBs originating from the facility. Even if that is valid, this tech-based requirement will need to be imposed in the permit; however, as you have indicated it may provide justification for PADEP's decision to maintain the PCB data collection and PMP activities in the permit. In addition to imposing the ELG requirement in the permit, I would recommend that the fact sheet provide a discussion of how PADEP understands the facility to be meeting the applicable TBEL, and include the justification for maintaining the PCB data collection and PMP activities in the permit as described below.

If you want to discuss this, please let me know.
Thank you,
Dana

Dana Hales
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Clean Water Branch
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From: Abraham, Sara Reji <saabraham@pa.gov>
Sent: Friday, January 29, 2021 7:54 AM
To: Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>
Cc: Patel, Pravin <prpatel@pa.gov>; Martinsen, Jessica <Martinsen.Jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>; Sanchez Gonzalez, Natalie <sanchez-gonzalez.natalie@epa.gov>; Camperson, Joseph <Camperson.Joseph@epa.gov>; Turner, Andre <Turner.Andre@epa.gov>
Subject: RE: [External] PA0244449 Marcus Hook Generating Station

Hi Michelle:

We offer the following response to EPA comments:

1.a. The following are the details of applicable BAT requirements at 423.13 which will be incorporated into the fact sheet or permit appropriately:

i.(a) We acknowledge that the regulation 423.13(a) { also 40 CFR 423.12(b)(2)} is applicable to this discharge. However, presence of PCBs has been documented in the facility's discharge due to the intake water from Delaware River. According to the applicant the facility is PCB free and the Delaware River water is the only potential source of PCBs in the discharge. Based on the Delaware River PCB TMDL requirement, the facility continue to implement the PCB PMP to achieve the PCB loading reduction goal. The standard condition regarding the PCB monitoring and PMP is included in the permit. DEP believe these facts and requirement could satisfy the applicability of the referenced regulation.

ii. (b)(1) and (b)(2) Since facility doesn't discharge any once through cooling water this part of the ELG is not applicable.

iii (d)(1) and (d)(3) The existing TRC limit in the permit addresses the requirement of Free available chlorine. To comply with the requirement related to the 126 priority pollutants, the following standard condition will be incorporated in Part C of the final permit.

"Cooling tower blowdown discharges shall contain no detectable amounts of the 126 Priority Pollutants listed in 40 CFR Part 423, Appendix A, that are contained in chemicals added for cooling tower maintenance, except for Total Chromium and Total Zinc. When requested by DEP, the permittee shall conduct monitoring or submit engineering calculations to demonstrate compliance with 40 CFR 423.13(d)(1)."

We want to reiterate that the intake water source and the receiving water source is the same. We have a chemical additive program in place to control the usage of chemical additives at the cooling tower. Also, the permit does have a monitoring requirement for Whole Effluent Toxicity for the discharge. DEP believes these facts and requirements meet the compliance with the referenced regulations.

Chromium, Total (0.2 mg/l) and Zinc, Total (1.0 mg/l) limits will be incorporated in the permit.

iii (d)(2) The following standard condition will be incorporated in Part C of the final permit to meet compliance with this requirement.

"Chlorine or other approved biocides may not be discharged from any single generating unit for more than two hours per day unless the discharger demonstrates to the permitting authority that discharges for more than two hours are required for macroinvertebrate control. Simultaneous multi-unit chlorination/biocide application is permitted."

1.b. For WET testing, according to the existing permit, the dilution series should be: 1%, 2%, 35%, 60% and 100% and historically the facility was using the dilution series 6.25%, 12%, 25%, 50% and 100%. For the purpose of renewal application, both dilution series were used for different tests. Specifically, EPA's concern was regarding the testing done on 06/26/2018 for which the dilution series used was "1%, 2%, 35%, 60% and 100%. WET toxicity was evaluated based on the reported NOEX/LC50 data as shown on the draft fact sheet.
Moving forward, the toxicity will be evaluated using the DEP's WET Analysis Spreadsheet based on the "Test of Significant Toxicity" approach and the standard condition is incorporated in the permit accordingly.

Hope the above response clarifies the EPA's concerns.
If you have any questions please contact me.

Thank you very much

Sara Abraham | Project Manager
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From: Price-Fay, Michelle <Price-Fay.Michelle@epa.gov>
Sent: Tuesday, January 19, 2021 8:33 PM
To: Abraham, Sara Reji <saabraham@pa.gov>
Cc: Furjanic, Sean <sefurjanic@pa.gov>; Patel, Pravin <prpatel@pa.gov>; Martinsen, Jessica <martinsen.jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>; Sanchez Gonzalez, Natalie <sanchez-gonzalez.natalie@epa.gov>; Camperson, Joseph <Camperson.Joseph@epa.gov>; Turner, Andre <turner.andre@epa.gov>
Subject: [External] PA0244449 Marcus Hook Generating Station

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Hello Sara,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Marcus Hook Generating Station
NPDES Number: PA0244449
EPA Received: December 21, 2020
30-day response due date: January 20, 2021

This is a major permit that discharges to the Delaware River. EPA has chosen to perform a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved Delaware River PCB TMDL, WET, Steam Electric Power Generating ELG (40 CFR Part 423), and 316(b) requirements. EPA has completed its review and offers the following comment(s):

1. As discussed with Dana Hales on 1/19/21, the following changes to the draft permit and/or fact sheet will be addressed:
    a. The permit applies 40 CFR 423.12 BPT requirements, but does not apply the applicable BAT requirements at 423.13:
        i. (a) – related to no discharges of PCBs (this is also a requirement of 423.12(b)(2)),
        ii. (b)(1) and (b)(2) – related to TRC in discharges of once through cooling water (while we discussed this section, please clarify whether this part of the ELG addressing once through cooling water actually applies to this facility),
        iii. (d)(1),(2) and (3) – related to level of pollutants discharged in cooling tower blowdown.
    b. Clarification is going to be provided on the WET data summarized in the fact sheet regarding the dilution series used by the facility and how PADEP evaluated WET toxicity.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Dana Hales on my staff via telephone at 215-814-2928 or via electronic mail at hales.dana@epa.gov.

Sincerely,
Michelle

Michelle Price-Fay, Chief
Clean Water Branch

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