Message

From: Hales, Dana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D18193CD39504DFD923A124DDE2C6240-WALKER, DANA]
Sent: 3/9/2021 9:43:34 PM
To: Blanco-Gonzalez, Joel [Blanco-Gonzalez.Joel@epa.gov]
Subject: FW: [External] PA0244449 Marcus Hook Generating Station
Attachments: revised Cooling Water Intake Condition based on draft comments.docx

Joel – I am having a call with Sara and Pravin tomorrow from 1-2 pm. Sara told me that Marcus Hook was not the owner/operator of the CWI structure (it is owned by Sunoco Partners – see Sara's email, below) and they proposed the attached permit changes for the draft permit I recently reviewed. Sara mentions that EPA and DEP discussed how to handle this, which makes me feel better but since I wasn't part of that previous discussion, I wanted SERO to go over the rationale behind how this is being permitted. Both so I can have an opinion on the Marcus Hook permit and so that I have a better understanding if it comes up again down the road.

Since you're back and you were likely part of this conversation – do you want to sit in with me tomorrow if you're free? I can fwd the invite and if you're not able to attend, no worries.

Dana Hales
US Environmental Protection Agency
Clean Water Branch
Permits Section (3WD41)
1650 Arch Street
Philadelphia, PA 19103
Phone: 215.814.2928
Email: hales.dana@epa.gov

From: Abraham, Sara Reji <saabraham@pa.gov>
Sent: Thursday, February 25, 2021 9:00 AM
To: Hales, Dana <Hales.Dana@epa.gov>
Cc: Patel, Pravin <prpatel@pa.gov>; Martinsen, Jessica <Martinsen.Jessica@epa.gov>; Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Subject: RE: [External] PA0244449 Marcus Hook Generating Station

Hi Dana:

This facility uses water provided by an independent supplier, Sunoco Partners Marketing and Terminals, L.P., Permit No. PA0011096, who owns the intake.
Both facilities are located at the Marcus Hook Industrial Complex .
And I know that during the renewal of Sunoco's permit in 2018, this issue came up and DEP Biologists/CO and EPA had discussions on how to deal with this.

Thank you

Sara Abraham | Project Manager
Department of Environmental Protection | Southeast Regional Office
2 East Main Street | Norristown, PA 19401
Phone: 484.250.5195 | Fax: 484.250.5971
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From: Hales, Dana <Hales.Dana@epa.gov>
Sent: Wednesday, February 24, 2021 4:54 PM
To: Abraham, Sara Reji <saabraham@pa.gov>
Cc: Patel, Pravin <prpatel@pa.gov>; Martinsen, Jessica <martinsen.jessica@epa.gov>; Moncavage, Carissa <Moncavage.Carissa@epa.gov>
Subject: RE: [External] PA0244449 Marcus Hook Generating Station

Hi Sara,

That's unusual – I have some follow up questions. If Marcus Hook doesn't own or operate the cooling water intake structure, then who does? Is that entity's intake permitted separately under a different NPDES permit, by chance? I would need to run this by our 316(b) person (Carissa Moncavage) to see if there are any issues/concerns, so please let us get back to you or determine the need for a phone conversation. It is my understanding the way it is proposed here, that the facility will continue to operate a closed cycle recirculating system to address BTA requirements for impingement and entrainment, but they would have no control over the operation of the intake structure.

Thanks,
Dana

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From: Abraham, Sara Reji <saabraham@pa.gov>
Sent: Wednesday, February 17, 2021 12:05 PM
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:

Just want to let you know that the Cooling Water Intake Condition in the permit has been revised based on permittee's comments.
Marcus Hook Energy does not own or operate the cooling water intake structure and the condition is revised accordingly.
See the attached revised condition which will be in the final permit.

Thank you very much

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From: Abraham, Sara Reji
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

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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 <u>once through cooling water</u> (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
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