Message

From: Hales, Dana [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D18193CD39504DFD923A124DDE2C6240-WALKER, DANA]
Sent: 7/21/2020 5:58:02 PM
To: Abraham, Sara Reji [saabraham@pa.gov]
CC: Smith, Mark [Smith.Mark@epa.gov]; Martinsen, Jessica [Martinsen.Jessica@epa.gov]; Patel, Pravin [prpatel@pa.gov]
Subject: RE: [External] Exelon Eddystone PA0013714

Hi Sara,

Thanks for the additional details that will be added to the fact sheet.

Regarding the PCB monitoring – I did double check the Delaware River PCB TMDL and Exelon Eddystone had four outfall listed with WLAs. This is just confirming that they were outfalls 001, 005, 007, and 008. Based on your discussions of outfalls 007/107 and 008/108 below, I understand the purpose for monitoring at IMP 108 (to 008) as no industrial wastewater is discharged via 007 any longer. Yes, please make sure the additional information you provided below is carried forward in your fact sheets in the section where you discuss consistency with the PCB TMDL WLA requirements.

I used to have access to the spreadsheets maintained by the states and DRBC, but we haven't gotten an updated spreadsheet from DRBC in some time. I will ask DRBC for that via another mechanism, because it affects more than this permit but thank you for offering.

I think that addresses all of our concerns. Thank you for the responses – you will see an email on our review of the draft permit this week.
Thanks,
Dana

Dana Hales
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From: Abraham, Sara Reji <saabraham@pa.gov>
Sent: Friday, July 17, 2020 2:09 PM
To: Hales, Dana <Hales.Dana@epa.gov>
Cc: Smith, Mark <Smith.Mark@epa.gov>; Martinsen, Jessica <Martinsen.Jessica@epa.gov>; Patel, Pravin <prpatel@pa.gov>
Subject: RE: [External] Exelon Eddystone PA0013714

Hi Dana:

We offer the following responses to your concerns:

1. Please See the attached revised fact sheet language regarding 316 (b) including a clear summary of BTA and SOP conditions. This will be incorporated in the final fact sheet.

2. The facility has eliminated the Outfall 005 completely. The last discharge from Outfall 005 was September 2014. Since that time the shut-off valve has been closed. The catch basin was permanently closed with a concrete plug on December 7, 2018. A rubber plug was also installed at the end of the pipe. The rubber plug was installed by DRBC.
   I will make a clarification in the final fact sheet.

3. Regarding PCB monitoring:

   Outfall 005 is eliminated and PCB monitoring requirement is discontinued with the agreement of DRBC.

   Regarding 007 and 008, I want you to double check if PCB monitoring was required either at 007 or at 008.

   In the past, industrial treatment plant effluent was discharging through 007 (via MP 107) or 008 (via 108).
   Therefore it was decided to monitor PCB at MP 107 originally.
   I have checked the past records and found that facility was monitoring PCB at MP 107 in 2008. Sometime after during the time line the facility stop discharging industrial treatment plant effluent through 107.
   Therefore PCB monitoring was changed to MP 108 with the agreement of DRBC.
   So now the current draft permit requires PCB monitoring at Outfall 001 and MP 108.
   I will include the details in the final fact sheet.

We have one excel spreadsheet with the PCB requirement of PA facilities, we keep it updated in consultation with DRBC for our reference , which has Outfall 001, Outfall 005 and MP108 listed for Eddystone facility. If you want to see
that let me know.

If you have any questions please contact me.
Thank you very much

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From: Hales, Dana <Hales.Dana@epa.gov>
Sent: Thursday, July 16, 2020 4:56 PM
To: Abraham, Sara Reji <saabraham@pa.gov>; Patel, Pravin <prpatel@pa.gov>; Unger, Steven <sunger@pa.gov>
Cc: Smith, Mark <Smith.Mark@epa.gov>; Martinsen, Jessica <martinsen.jessica@epa.gov>
Subject: [External] Exelon Eddystone PA0013714

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Sara, Pravin, and Steve,

Thank you for talking with us this morning about the Exelon Eddystone draft permit (PA0013714**).** Below is a summary of the items that EPA is asking you to address in the fact sheet and/or permit. Let's see what can be addressed before our comments are due on the draft permit next week.

1. Regarding 316(b):
    a. Please include a statement in the fact sheet that clearly states the Department's BTA determination for impingement and entrainment for this facility.
    b. The fact sheet references the facility's SOP for a Flow Reduction Alternative, but doesn't' explain what that plan entails. Please revise the fact sheet to include some details about the plan and the proposed reductions in water withdrawals resulting from its implementation.
2. Outfall 005 was removed from the permit. The fact sheet states the following about outfall 005:

    Outfall 005, previously discharging stormwater from equipment and roof drains associated with Units 1 and 2 is eliminated from this permit. All equipment and associated structures that contributed to the discharge from 005 have been removed.

    It's unclear whether outfall 005 is still discharging stormwater and needs to remain in the permit (with no specific monitoring requirements), or whether the outfall has completely be eliminated and no longer exists. If the stormwater outfall remains, it should be appropriately identified in the permit.
3. The Delaware River PCB TMDL identifies 4 outfalls for this facility with WLAs. Those outfalls include 001, 005, 007, and 008. While PCB monitoring is required at outfall 001 and MP 108, the fact sheet doesn't include any explanation of why PCB monitoring is not required at the other outfalls. I realize this decision was likely made in consultation with DRBC in the past, but this justification needs to be provided in the fact sheets to document consistency with the TMDL WLAs.

Let us know if any additional conversations are needed.
Thanks,
Dana

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