From:	Jordan, Ronald
To:	Thomas Finseth
Subject:	FW: Response to Proposed Steam Electric Effluent Guidelines Data Request
Date:	Monday, February 24, 2014 10:33:00 AM
Attachments:	Analytical Data Table.xlsx TMT15 msds.pdf QGESS_DetailCoalSpecs_Rev4_20130510.pdf Keystone Laboratory Reports 2012.2013.pdf SE04293_Data Request Spreadsheet_NRG_Energy_01212014.xlsx Process Flow Diagram for FGD WWT.pdf

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From: Frank, Stephen [mailto:Stephen.Frank@nrgenergy.com]
Sent: Friday, February 21, 2014 9:02 AM
To: Jordan, Ronald
Cc: Alicea, Jezebele; Flanders, Phillip; Schroeder, Cuc; Shriner, Paul
Subject: Response to Proposed Steam Electric Effluent Guidelines Data Request

Dear Mr. Jordan,

As requested on January 17, 2014, GenOn Northeast Management Company (GenOn), a subsidiary of NRG Energy, is providing information about the influent and effluent from the Keystone Generating Station's (Keystone) FGD Scrubber Wastewater Treatment Plant (WWTP). This information includes:

1. Arsenic and mercury concentration data collected during the period January 2012 to December 2013. The data are presented on the attached Analytical Data Table. Note that influent flow data was not available. However, because we collect our influent and effluent samples on the same day, the effluent flow rates are representative of the influent flow rates. Minor differences in flows would be associated with moisture in filter cake solids and the addition of water associated with chemical additives.

   Samples represent the same sampling locations as those used during EPA's sampling episode at the Keystone Generating Station that took place in September 2010, including the FGD scrubber purge (from purge tank) and the effluent discharged to the Allegheny River (prior to commingling with any other waste streams. A process flow diagram of the system sampled, including the specific sample
   locations (SP-1 [influent] and SP-2 [effluent]) for which data are being provided is attached. Laboratory reports associated with the sampling data are attached (note that the oldest to newest files generally are reflective of the oldest to newest sample collection dates).

2. An MSDS for the organosulfide additive (TMT 15®) used in the FGD

WWTP is attached. Chemicals and dosages added to the treatment system, including location of injection points are shown on the Process Flow Diagram.

3. As discussed, Keystone is operated by GenOn and has multiple owners, and coal is selected by the Keystone Conemaugh Owners Group. In 2012 and 2013, the coal used at Keystone was High Volatile Bituminous coal from the Appalachian Basin. Multiple coal supplies are blended and used at the station. Exhibit 6.2 in the QGESS report summarizes BTU, Sulfur, Mercury and Chlorine information, which is generally consistent with the blends of coal used at Keystone. Our coal will mainly come from PA, WV and IL in the future.

4. Information regarding the specific type and source of coal used at Keystone was not available. However, Keystone does monitor several parameters that are being requested. This information is provided on SE04293 Data Request Spreadsheet NRG Energy 01212014. Specifically, the BTU and Sulfur content data are the average for the coal blend burned in Unit 1 and Unit 2 on the dates indicated. In 2012 and 2013, chlorine content was not monitored, but was consistent with the concentrations provided in Exhibit 6.2 in the QGESS report for Pennsylvania (1,048 ppm dry) and West Virginia (1,044 ppm dry). As indicated above, our coal will mainly come from PA, WV and IL in the future. Therefore, the chlorine content in our fuel blend would increase if utilizing coal from the Illinois Basin (1,691 ppm dry).

5. Available information for each day of operation in 2012 and 2013 are provided in SE04293 Data Request Spreadsheet NRG Energy 01212014. Average daily ORP data from the Unit 1 & 2 absorbers are not collected on a consistent basis. Therefore, only a few data points are available. Chloride concentration, pH, and average daily ORP are not monitored at the influent to the FGD WWTP. However, the average of the data provided for the Unit 1 & 2 absorbers should be representative of the influent to the FGD WWTP. Electricity Generation output is included on the spreadsheet. Gaps in the output for each unit represent periods when the units were not being operated.

In January 2014, Keystone began using a more sensitive analytical method (Modified Method 200.8) for the analysis of arsenic, selenium and other trace metals. This new method became available at our local laboratory (Geochemical Testing) in November 2013. Therefore, Keystone could provide this data in the future if requested.

Please do not hesitate to contact me with any questions or comments.

Regards, Steve

Stephen M. Frank, PE
Senior Environmental Specialist
Office: 724-597-8310
Mobile: 724-249-3610

The power to change life.

From: Jordan, Ronald [mailto:Jordan.Ronald@epa.gov]
Sent: Tuesday, January 21, 2014 11:08 AM
To: Frank, Stephen
Cc: Alicea, Jezebele; Flanders, Phillip; Schroeder, Cuc; Shriner, Paul
Subject: RE: Follow up to comments on proposed Steam Electric effluent guidelines

Steve,

My Friday email should've included a couple additional attachments. Please use the attached Excel files for the data you provide.

Regards,
Ron

From: Frank, Stephen [mailto:Stephen.Frank@nrgenergy.com]
Sent: Friday, January 17, 2014 12:24 PM
To: Jordan, Ronald
Cc: Alicea, Jezebele; Flanders, Phillip; Schroeder, Cuc; Shriner, Paul
Subject: RE: Follow up to comments on proposed Steam Electric effluent guidelines

Ron,

We will review the request internally and with Keystone Generating Station and get back to you with any questions. Does EPA have an anticipated schedule for receipt of this additional information?

Thanks, Steve

NRG Energy

Stephen M. Frank, PE
Senior Environmental Specialist
Office: 724-597-8310
Mobile: 724-249-3610

From: Jordan, Ronald [mailto:Jordan.Ronald@epa.gov]
Sent: Friday, January 17, 2014 11:53 AM
To: Frank, Stephen
Cc: Alicea, Jezebele; Flanders, Phillip; Schroeder, Cuc; Shriner, Paul
Subject: Follow up to comments on proposed Steam Electric effluent guidelines

Good morning Mr. Frank,

As you are aware, on June 7, 2013, EPA published proposed revisions to the effluent limitations guidelines and standards (ELGs) for the steam electric power generating point source category. The comment period for the proposed rule closed on September 20. Based on our review of comments submitted by your company and other comments relating to the proposed ELGs, we have concluded that additional information is either needed or would be useful in evaluating comments with respect to FGD wastewater characterization and treatment performance. Please see the attached letter for a description of the information that EPA is asking you to provide.

We appreciate the information you've provided to date, as well as the cooperation your company provided as EPA collected information for the proposed rule. Should you have any questions regarding this request for additional information related to the comments we received, please contact me at jordan.ronald@epa.gov or by phone at (202) 566-1003.

Regards,
Ron Jordan

Ron Jordan
EPA Office of Water
Engineering and Analysis Division
(202) 566-1003

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