

**Section VII            Comments on Revisions to Limits for Outfall 012****Comment VII.A:    Waste Segregation**

Mirant comments that:

Following are Mirant Canal's comments on the new and revised permit limits and conditions proposed for Canal Station's Outfall 012. The current permit authorizes the Canal Station to discharge demineralizer and condensate polisher wastes from Units 1 and 2, and floor drains from Unit 2 via this outfall. As noted above, the Draft Permit would require the Station to segregate all metal cleaning wastes, both chemical and non-chemical, from other low volume wastes and from ash sluice water. It also would authorize discharge of ash sluice water and low volume wastes (consisting of floor drains waster treatment wastes (demineralizer and condensate polisher), boiler blowdown, laboratory washwater, and boiler seal water) through internal Outfall 012.

For the reasons explained above in Section V[I].A, Mirant Canal objects to the revisions requiring the segregation of all metal-cleaning wastes, and particularly non-chemical metal cleaning wastes, from other low volume wastes and ash sluice water, and the discharge of ash and low volume wastes through this outfall. We reiterate here our request that EPA reconsider this proposed requirement and amend the provisions applicable to Outfalls 011 and 012 accordingly.

**Response VII.A:**

EPA has concluded on a BPJ basis that treating non-chemical metal cleaning wastes to the same level as low volume wastes does not reflect BAT. *See* Response VI.A.1. EPA has determined that non-chemical metal cleaning wastes should be treated to the same level as chemical metal cleaning wastes and, thus, meet additional requirements for copper and iron. Separation of metal cleaning wastes, chemical and non-chemical, from low volume fly ash wastes is necessary to ensure compliance with effluent limitations guidelines at 40 C.F.R. Part 423.

**Comment VII.B:    Sampling Requirements**

Mirant comments that:

The Draft Permit proposes to increase the sampling requirements for Outfall 012 from once every two weeks to once per week. Here again, EPA provides no explanation for this increase. Thus, Mirant Canal objects to the increase in testing and asks that the current sampling frequency be retained.

**Response VII.B:**

EPA changed the descriptions of outfalls 011 and 012 from the previous permit issued in 1989 in order to separate the metal cleaning waste streams from the low volume/ash sluice waste streams

because metal cleaning wastes must meet technology-based limits for copper and iron. See Response to Comment VI.A.1.

EPA initially thought increased sampling was appropriate to accompany the new permit limits, but , upon further evaluation, EPA has agreed to reduce the monitoring frequency from once per week to twice per month as the commenter requests. EPA believes that twice monthly monitoring will still provide representative data based on the small effluent variability of these waste streams in general and the total number of samples that will be collected over the permit term.

### **Comment VII.C from Commonwealth of Massachusetts - Riverways Program**

MA Riverways comments that:

The flow limitations for two of the outfalls are different from the existing permit's average monthly and daily maximum flows. For outfall 011 the flow limits have been reduced by approximately half. A reduction in effluent is a positive action and we support this reduction. Unfortunately this modest reduction is more than offset by the more than four fold increase proposed for outfall 01[2]. The Fact Sheet does not discuss this flow increase or the anti-backsliding implications of this flow increase. The monitoring data, submitted by the Permittee, shows the outfall consistently meets the existing and lower flow limits. We strongly advocate for keeping the existing flow limitations for outfall 01[2].

### **Response VII.C:**

As explained on pages 13 through 15 of the Fact Sheet, EPA changed the descriptions of outfalls 011 and 012 from the last (1989) permit in order to separate the metal cleaning waste streams from the low volume/ash sluice waste streams because metal cleaning wastes must meet technology-based limits for copper and iron. The outfalls are now configured as follows:

#### **1989 Permit Outfalls**

011 – “Equipment Washes, Chemical Cleaning and Ash Sluice Blowdown”

012 – “Demineralizer and Condensate Polisher Wastes from Unit No. 1 and 2, and Floor Drains from Unit 2”

#### **2008 Permit Outfalls**

011 - “metal cleaning waste streams (*consisting of air preheater wash, boiler fireside wash, precipitator wash, boiler chemical cleaning, stack and breach wash, equipment cleaning and feedwater heater chemical cleaning, metal cleaning sludge dewatering filtrate*)”

012 – “ash sluice wastewater and low volume waste streams (*consisting of floor drains, water treatment wastes (demineralizer and condensate polisher), boiler blowdown, laboratory wastewater, and boiler seal water*)”

Consistent with applicable anti-backsliding regulations, EPA agrees that the total net flow for both locations combined should not exceed the current permitted combined flow limits.<sup>1</sup> EPA has added the following requirement to the Final Permit: “the total average monthly combined flow from outfall locations 011 and 012 shall not exceed 0.32 MGD and the total maximum daily combined flow from outfall locations 011 and 012 shall not exceed 0.52 MGD.” See Part I.A.6.b of the Final Permit. At this time EPA does not have the necessary data or information to accurately apportion flows between the two outfalls. EPA has therefore changed the flow limits at each location to “Report” in the Final Permit and currently anticipates imposing flow limits to the respective outfalls in the next permit cycle.

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<sup>1</sup> The current permit allows the discharge of chemical metal cleaning and ash sluice wastewater through outfall 011. Mirant Canal consistently meets the flow limits at this location mainly because chemical metal cleaning of the boiler, which results in the majority of the metal cleaning wastewater generated (approximately 250,000 gallons), is performed during plant shutdowns (generally occurring once per year) when ash is not being generated. Mirant discharges this metal cleaning waste without the added ash sluice wastewater during the shutdown period at flow volumes that meet the permitted limits. However, Mirant may not need to discharge metal cleaning every month, let alone every day. The ash sluice water is now a part of outfall 012 along with low volume wastes.