Re: WWTP No. 1 Discharge

palmeag to: John King 06/22/2011 11:39 AM

From: palmeag@nu.com
To: John King/R1/USEPA/US@EPA

Interpretation is in the eye of the beholder. Which is exactly the reason you should come to the station to walk through and discuss the various aspects you are regulating. I'm not asking you to divulge trade secrets, I'm merely suggesting that you observe firsthand the treatment systems, wastestreams and geography so that you can write the most sensible and workable conditions, free of assumption and conjecture.

From: king.john@epamail.epa.gov
To: Allan G. Palmer/NUS@NU
Date: 06/21/2011 03:43 PM
Subject: Re: WWTP No. 1 Discharge

It may be your interpretation; but I need implement regulations as they are written. I do recognize the permittee may have an alternative approach which could be less onerous and still produce the required data. I am not at liberty to meet with you, review the draft permit and explore alternate sampling régimes.

I can, though, try to address specific questions you have.

-----palmeag@nu.com wrote: -----
To: John King/R1/USEPA/US@EPA
From: palmeag@nu.com
Date: 06/21/2011 01:00PM
Subject: Re: WWTP No. 1 Discharge

Spoken like a true regulator. My suggestion is that there may be alternative ways to monitor which will still provide the necessary information in a less onerous way. When we have openly explored inconvenient arrangements in the past, we have been able to reach a middle ground that pleased both parties.

From: king.john@epamail.epa.gov
To: Allan G. Palmer/NUS@NU
Date: 06/21/2011 12:43 PM
Subject: Re: WWTP No. 1 Discharge

Allan,

Thank you for the quick and thorough reply.

I realize the new monitoring scheme may prove very inconvenient. We can discuss; however, I foresee the regulations may not afford sufficient room to provide you relief.

John

From: palmeag@nu.com

To: John King/R1/USEPA/US@EPA

Cc: krohkl@nu.com, auclaaa@nu.com

Date: 06/21/2011 12:24 PM

Subject: Re: WWTP No. 1 Discharge

John, Under normal operating conditions the effluent gravity flows through a set of permanent pumps to the pond. To manage outage wastewater, e.g., air heater fireside washes, the treated effluent can be:

1. Pumped with portable pumps from a basin into an open trough that gravity flows to the pond, or
2. Allowed to overflow a basin into the open trough and gravity flow to the pond, or
3. Pumped to the pond via the permanent pumps.

The FGD WWTS effluent will be pumped to the pond.

You really need to come see the facility and we need to discuss the problems your new monitoring scheme will create. Thanks, Allan.

From: king.john@epamail.epa.gov
To: Allan G. Palmer/NUS@NU
Date: 06/20/2011 11:10 AM

Subject: WWTP No. 1 Discharge

Allan,

How is the effluent discharge to the Slag Settling Pond? By pump or gravity flow?

Same Question for the FGD WWTF Effluent Discharge

Thank you, John