National Pollutant Discharge Elimination System (NPDES) Permit Program

FACT SHEET

Regarding a Modification to an NPDES Permit To Discharge to Waters of the State of Ohio
For **Dynegy Zimmer, LLC – William H. Zimmer Station (Zimmer Station)**

Public Notice No.: 16-09-073
Public Notice Date: September 23, 2016
Comment Period Ends: October 23, 2016

Ohio EPA Permit No.: **1IB00011*MD**
Application No.: **OH0048836**

Name and Address of Applicant:
Dynegy Zimmer LLC
1500 Eastport Plaza Drive
Collinsville, Illinois 62234

Name and Address of Facility Where Discharge Occurs:
Dynegy Zimmer LLC
William H. Zimmer Station
1781 U.S. Route 52
Moscow, Ohio 45153
Clermont County

Receiving Water: **Ohio River and Tributaries of Little Indian Creek**

Subsequent Stream Network: **Ohio River**

Introduction

Development of a Fact Sheet for NPDES permits is mandated by Title 40 of the Code of Federal Regulations (CFR), Section 124.8 and 124.56. This document fulfills the requirements established in those regulations by providing the information necessary to inform the public of actions proposed by the Ohio Environmental Protection Agency (Ohio EPA), as well as the methods by which the public can participate in the process of finalizing those actions.

This Fact Sheet is prepared in order to document the technical basis and risk management decisions that are considered in the determination of water quality based NPDES Permit effluent limitations. The technical basis for the Fact Sheet may consist of evaluations of promulgated effluent guidelines, existing effluent quality, instream biological, chemical and physical conditions, and the relative risk of alternative effluent limitations. This Fact Sheet details the discretionary decision-making process empowered to the Director by the Clean Water Act (CWA) and Ohio Water Pollution Control Law (Ohio Revised Code [ORC] 6111). Decisions to award variances to Water Quality Standards (WQS) or promulgated effluent guidelines for economic or technological reasons will also be justified in the Fact Sheet where necessary.

No antidegradation review was necessary.

Ohio EPA reviews the need for water-quality-based limits on a pollutant-by-pollutant basis.

Summary of Permit Conditions

The effluent limits and monitoring requirements are the same as in the existing permit. One parameter with an effluent limit was added to outfall 057 and eight additional storm water outfalls were added.

Outfall 057

A new maximum oil and grease limit is proposed that is protective of water quality standards from an oil/water separator that receives storm water runoff from a parking lot at the maintenance garage.

Outfall 099

A time extension of 4 months from the effective date of the modification is proposed for mercury in Part I.C.1 of the schedule of compliance.

Internal Station 602 and 615

A time extension of 4 months from the effective date of the modification is proposed for copper in Part 1.C.2 of the schedule of compliance.

Storm Water Monitoring

Outfalls 076 through 083 are being proposed for coverage under Parts IV, V, and VI of the permit. Outfall 050 is representative of these outfalls. These outfalls are currently covered under Ohio EPA NPDES general permit No. 1GC05146*AG/OHC000004. Once this modification becomes effective Zimmer Station may submit a Notice of Termination to cease coverage under the general permit.

Storm water outfalls 053, 074 and 075 were eliminated. These areas have been stabilized with a vegetative cover.

Procedures for Participation in the Formulation of Final Determinations

The draft action shall be issued as a final action unless the Director revises the draft after consideration of the record of a public meeting or written comments, or upon disapproval by the Administrator of the U.S. Environmental Protection Agency.

Within thirty days of the date of the Public Notice, any person may request or petition for a public meeting for presentation of evidence, statements or opinions. The purpose of the public meeting is to obtain additional evidence. Statements concerning the issues raised by the party requesting the meeting are invited. Evidence may be presented by the applicant, the state, and other parties, and following presentation of such evidence other interested persons may present testimony of facts or statements of opinion.

Requests for public meetings shall be in writing and shall state the action of the Director objected to, the questions to be considered, and the reasons the action is contested. Such requests should be addressed to:

Legal Records Section
Ohio Environmental Protection Agency
P.O. Box 1049
Columbus, Ohio 43216-1049

Interested persons are invited to submit written comments upon the discharge permit. Comments should be submitted in person or by mail no later than 30 days after the date of this Public Notice. Deliver or mail all comments to:

Ohio Environmental Protection Agency
Attention: Division of Surface Water
Permits Processing Unit
P.O. Box 1049
Columbus, Ohio 43216-1049

The Ohio EPA permit number and Public Notice numbers should appear on each page of any submitted comments. All comments received no later than 30 days after the date of the Public Notice will be considered.

Citizens may conduct file reviews regarding specific companies or sites. Appointments are necessary to conduct file reviews, because requests to review files have increased dramatically in recent years. The first 250 pages copied are free. For requests to copy more than 250 pages, there is a five-cent charge for each page copied. Payment is required by check or money order, made payable to Treasurer State of Ohio.

For additional information about this fact sheet or the draft permit, contact Sandra Leibfritz se, (937) 285-6104, sandra.leibfritz@epa.ohio.gov.

Information Regarding Certain Water Quality Based Effluent Limits

This draft permit may contain proposed WQBELs for parameters that **are not** priority pollutants. (See the following link for a list of the priority pollutants: http://epa.ohio.gov/portals/35/pretreatment/Pretreatment_Program_Priority_Pollutant_Detection_Limits.pdf .) In accordance with ORC 6111.03(J)(3), the Director established these WQBELs after considering, to the extent consistent with the Federal Water Pollution Control Act, evidence relating to the technical feasibility and economic reasonableness of removing the polluting properties from those wastes and to evidence relating to conditions calculated to result from that action and their relation to benefits to the people of the state and to accomplishment of the purposes of this chapter. This determination was made based on data and information available at the time the permit was drafted, which included the contents of the timely submitted NPDES permit renewal application, along with any and all pertinent information available to the Director.

This public notice allows the permittee to provide to the Director for consideration during this public comment period additional site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness for achieving compliance with the proposed final effluent limitations for these parameters. The permittee shall deliver or mail this information to:

Ohio Environmental Protection Agency
Attention: Division of Surface Water
Permits Processing Unit
P.O. Box 1049
Columbus, Ohio 43216-1049

Should the applicant need additional time to review, obtain or develop site-specific pertinent and factual information with respect to the technical feasibility and economic reasonableness of achieving compliance with these limitations, written notification for any additional time shall be sent to the above address no later than 30 days after the Public Notice Date on Page 1.

Should the applicant determine that compliance with the proposed WQBELs for parameters other than the priority pollutants is technically and/or economically unattainable, the permittee may submit an application for a variance to the applicable WQS used to develop the proposed effluent limitation in accordance with the terms and conditions set forth in OAC 3745-33-07(D). The permittee shall submit this application to the above address no later than 30 days after the Public Notice Date.

Alternately, the applicant may propose the development of site-specific WQS pursuant to OAC 3745-1-35. The permittee shall submit written notification regarding their intent to develop site specific WQS for parameters that are not priority pollutants to the above address no later than 30 days after the Public Notice Date.

Location of Discharge/Receiving Water Use Classification

Zimmer Station Outfalls 602 and 615 discharges to the Ohio River at River Miles 443 (Outfall 003) and outfall 099 discharges to the Ohio River at River Miles 443.4 (099). There are also numerous discharge points throughout the electric power generating facility and associated landfill area that discharge to unnamed tributaries of Little Indian Creek. Figure 1 shows the approximate location of the facility with the major outfalls. It does not show the locations of the internal monitoring outfalls or storm water outfalls. Table 1 provides the location (latitude and longitude) of the proposed storm water outfalls 076 through 083.

This segment of the Ohio River is described by Ohio EPA River Code: 25-100, USEPA River Reach #: 05090201-005, County: Clermont, Ecoregion: Interior Plateau. The Ohio River is presently designated for the following uses under Ohio's WQS (OAC 3745-1-32): Warmwater Habitat (WWH), Agricultural Water Supply (AWS), Industrial Water Supply (IWS), Public Water Supply (PWS) and Bathing Waters Recreation (BW).

This segment of Little Indian Creek is described by Ohio EPA River Code: 10-019, USEPA River Reach #: 05090201-NA, County: Clermont, Ecoregion: Interior Plateau. Little Indian Creek is presently designated for the following uses under Ohio's WQS (OAC 3745-1-17): WWH, AWS, IWS, and Class B Primary Contact Recreation (PCR).

Use designations define the goals and expectations of a waterbody. These goals are set for aquatic life protection, recreation use and water supply use, and are defined in the Ohio WQS (OAC 3745-1-07). The use designations for individual waterbodies are listed in rules -08 through -32 of the Ohio WQS. Once the goals are set, numeric WQS are developed to protect these uses. Different uses have different water quality criteria.

Use designations for aquatic life protection include habitats for coldwater fish and macroinvertebrates, warmwater aquatic life and waters with exceptional communities of warmwater organisms. These uses all meet the goals of the federal CWA. Ohio WQS also include aquatic life use designations for waterbodies which cannot meet the CWA goals because of human-caused conditions that cannot be remedied without causing fundamental changes to land use and widespread economic impact. The dredging and clearing of some small streams to support agricultural or urban drainage is the most common of these conditions. These streams are given Modified Warmwater [MWH] or Limited Resource Water designations.

Recreation uses are defined by the depth of the waterbody and the potential for wading or swimming. Uses are defined for bathing waters, swimming/canoeing (PCR) and wading only (Secondary Contact - generally waters too shallow for swimming or canoeing).

Water supply uses are defined by the actual or potential use of the waterbody. PWS designations apply near existing water intakes so that waters are safe to drink with standard treatment. Most other waters are designated for AWS and IWS.

Facility Description

Zimmer Station is an approximately 1300-1400 megawatt coal-fired steam electric generating station. The facility consists of one generating unit and the condenser cooling water is cooled with a natural draft cooling tower prior to recycle or discharge. The operations at the facility are classified by the Standard Industrial Classification (SIC) code of 4911-"Electric Services" and, therefore, process discharges from the facility are regulated under the federal ELGs outlined in 40 CFR Part 423, "Steam Electric Power Generating" Industrial Category. Also, since the facility was originally commissioned and online in 1991, the New Source Performance Standards (NSPS) highlighted by those federal regulations will be applicable to the appropriate facility discharges.

The flue gas desulfurization process controls sulfur air emissions and produces synthetic gypsum which is either sold or disposed of in the on-site landfill. Dry fly ash is either sold or disposed of in the on-site landfill. Bottom ash is sluiced out wet and goes to bins for dewatering in a closed loop process.

Zimmer Station obtains potable water from Tate-Monroe, uses a deep well to supply water for the boilers and fire protection system, and has a river intake (monitoring station 801). Zimmer Station's intake flow rate is approximately 36.5 million gallons per day (MGD).

Description of Existing Discharge

Outfall 057

Outfall 057 is storm water runoff from the landfill haul road. Existing permit limits will remain the same.

Outfall 099

Outfall 099 is the largest discharge point and is a calculated outfall consisting of the discharges from outfall 021/091, internal monitoring station 614, and internal monitoring station 625 (if appropriate). Compliance/monitoring/reporting at outfall 099 is determined utilizing a flow-weighted average or total of the results measured at outfall 021/091 and internal monitoring station 614. Existing permit limits will remain the same.

Outfall 602 and 615

The permit contains monitoring and limits at internal stations Outfall 602 and 615. Internal monitoring station 602 is from Zimmer Power's sanitary wastewater treatment plant that contributes to outfall 003. Internal monitoring station 615 is cooling tower seepage and overboard that contributes to outfall 003. Existing permit limits will remain the same; however, Zimmer Power requested an extension of time to the compliance schedule in Part I.C.2 for copper.

Basis of the Modification

Outfall 057

Zimmer Power provided additional information that an oil/water separator contributes storm water runoff from a parking lot at the maintenance garage Ohio EPA proposes a new oil and grease limit at outfall 057 to address the discharge from the oil/water separator. Refer to Table 2.

Outfall 099

Zimmer Power requested an extension of time to the compliance schedule in Part I.C.1. Ohio EPA proposes to extend the schedule for mercury by 4 months from the proposed effective date.

Outfall 602 and 615

Zimmer Power requested an extension of time to the compliance schedule in Part I.C.2. Ohio EPA proposes to extend the schedule for copper by 4 months from the proposed effective date.

Outfalls 076 through 083

Ohio EPA proposes including storm water outfalls 076 through 083 to the Sampling Stations in Part II.B. These outfalls will be covered by Parts IV, V and VI. See Table 2 for location of proposed outfalls. These outfalls were determined, based on best professional judgement, to be representative of outfall 050 that includes benchmark monitoring requirements. Inclusion of these outfalls in this permit eliminates the need for coverage under Ohio EPA's general permit for construction sites (NPDES No. 1GC05146*AG/OHC000004).

Storm water outfalls 053, 074 and 075 were eliminated. These areas have been stabilized with a vegetative cover.

Outfall 005

Methylene blue active substance and chemical oxygen demand is proposed for monitoring on a quarterly basis to evaluate effluent quality from the use of additives for dust suppression, freeze protection and odor treatment.

Figure 1. Approximate Location of Zimmer Station

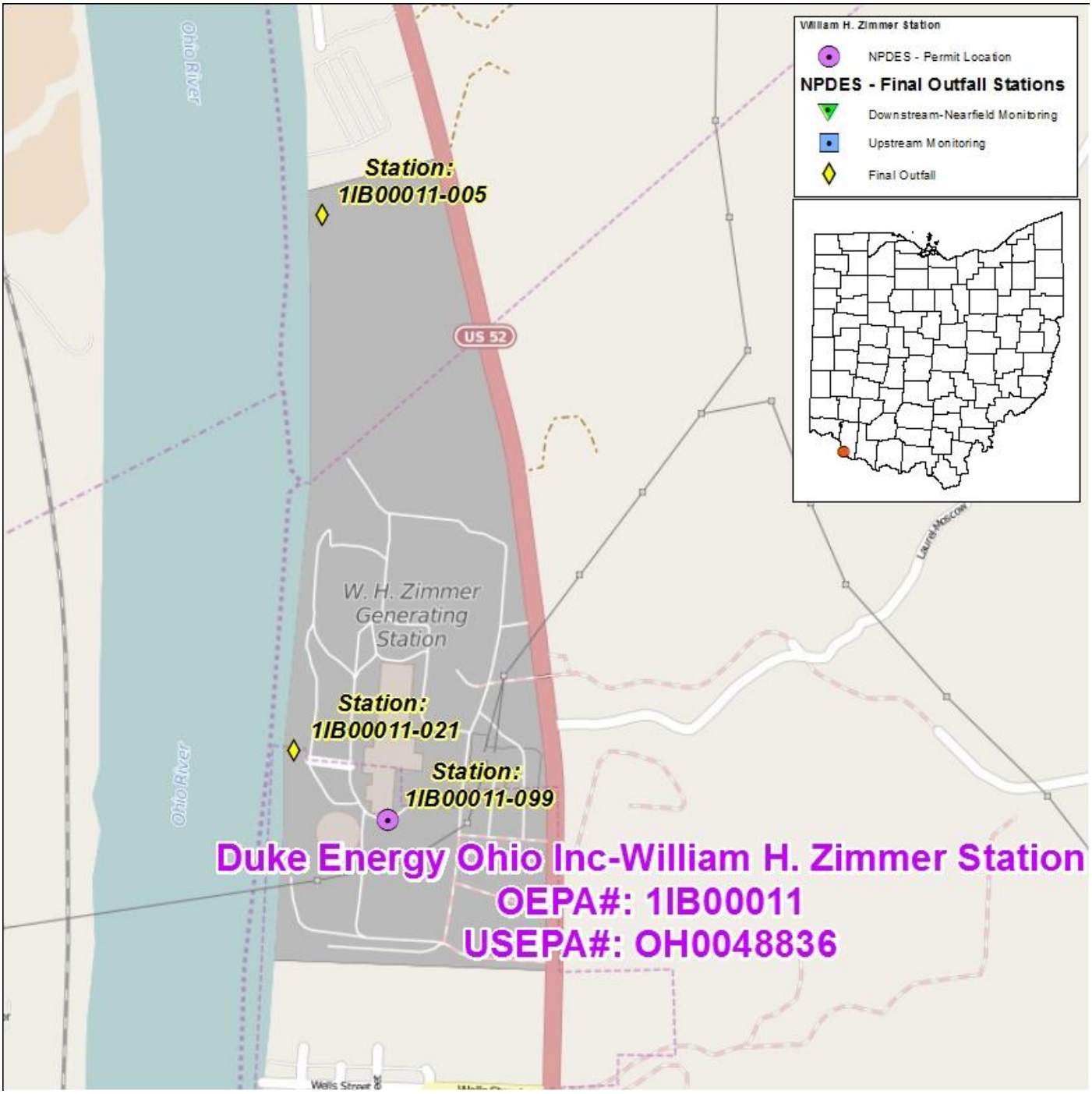

Table 1. Zimmer Station New Storm Water Outfalls

Station #	Latitude	Longitude	Receiving Stream	Description/Activity of Outfall Location
076[a]	38 51’ 13”	84 09’ 41”	Tributaries of Little Indian Creek	Landfill storm water runoff from northeast area of permanent cover
077[a]	38 51’ 00”	84 09’ 49”	Tributaries of Little Indian Creek	Landfill storm water runoff from northeast area of permanent cover
078[a]	38 51’ 26”	84 09’ 40”	Tributaries of Little Indian Creek	Landfill storm water runoff from far northeast area of permanent cover
079[a]	38 51’ 22”	84 11’ 03”	Tributaries of Little Indian Creek	Storm water runoff from active borrow area (Brown Road II)
080[a]	38 51’ 17”	84 10’ 58”	Tributaries of Little Indian Creek	Storm water runoff from active borrow area (Brown Road II)
081[a]	38 51’ 11”	84 10’ 52”	Tributaries of Little Indian Creek	Storm water runoff from future borrow area (Brown Road III)
082[a]	38 51’ 02”	84 10’ 55”	Tributaries of Little Indian Creek	Storm water runoff from future borrow area (Brown Road III)
083[a]	38 50’ 53”	84 10’ 48”	Tributaries of Little Indian Creek	Storm water runoff from future borrow area (Brown Road III)

[a] Representative of outfall 050

Table 2. Final Effluent Limitations

Parameter	Units	Concentration		Loading (kg/day)		Basis[a]
		30 Day Average	Daily Maximum	30 Day Average	Daily Maximum	
Outfall 057						
Oil & Grease	mg/L		10	--	--	WQS

[a] Definitions:

WQS = Ohio Water Quality Standards (OAC 3745-1)