NC0004979				
Facility Information				
Applicant/Facility Name:	Duke Energy Carolinas, LLC – Allen Steam Station			
Applicant Address:	P.O. Box 1006, Char	lotte, North Carolina 28201		
Facility Address:	253 Plant Allen Roa	d, Belmont, North Carolina 2	28012	
Permitted Flow	No limit			
Type of Waste:	~100% industrial			
		911 – Electric Services		
Facility/Permit Status:	Class I/Active; Rene	wal		
County:	Gaston County			
	Miscel	laneous		
Receiving Stream:	Catawba River (11- 123.5), South Fork Catawba River (Lake Wylie)	Regional Office:	Mooresville	
Stream Classification:	WS-IV B (Catawba River) and WS-V B (South Fork Catawba River)	State Grid / USGS Quad:	G14 NE	
303(d) Listed?	Yes (Catawba River Only)	Permit Writer:	Sergei Chernikov, Ph.D.	
Subbasin:	03-08-34	Date:	May 10, 2016	
Drainage Area (mi ²):	635 (Catawba River)			
Summer 7Q10 (cfs)	95		7	
Winter 7Q10 (cfs):	95			
30Q2 (cfs)	314			
Average Flow (cfs):	2470	001: Lat. 35° 11' 23" N 002: Lat. 35° 10' 30" N	Long. 81° 00' 45" W Long. 81° 00' 23" W	
IWC (%):	23.6 (Outfall 002	002: Lat. 35° 10' 30' N 002A: Lat. 35° 11' 34" N	Long. 81° 00° 23" W	
	and Outfall 006)	002B: Lat. 35° 11' 36" N	Long. 81° 00' 30'' W	
		002D. Lat. 35° 11' 35" N 004: Lat. 35° 11' 35" N	Long. 81° 00' 22'' W	
		006: Lat. 35° 11' 35" N	Long. 81° 00' 22'' W	
		008: Lat. 35° 10' 55" N	Long. 81° 00' 24" W	

NCDEQ/DWR FACT SHEET FOR NPDES PERMIT DEVELOPMENT

Duke Energy Carolinas, LLC – Allen Steam Station

SUMMARY

This revised draft permit incorporates changes made subsequent to a Public Hearing held on April 8, 2015 seeking comments to the original draft NPDES wastewater permit renewal for Allen Steam Station.

Duke Energy's Allen Steam Station is a coal fired steam electric plant in Gaston County. Units 1, 2, and 3 are scheduled to retire by December 31, 2024. Duke is evaluating early retirement options for the facility. By December 31, 2017, Duke will make the determination on early retirement. If the decision is to retire the units by December 31, 2023, the ELG applicability date for bottom ash transport water and FGD wastewater will be December 31, 2023. If the decision is not to retire the units by December 31, 2023, the ELG applicability date for bottom ash transport water and FGD wastewater will be December 31, 2023. If the decision is not to retire the units by December 31, 2023, the ELG applicability date for bottom ash transport water and FGD wastewater will be February 28, 2021.

The facility is subject to the effluent guidelines - 40 CFR 423.12. The facility is also subject to the Cooling Water Intake Structure Rule (316(b) Rule) per 40 CFR 125.95 and Coal Ash Management Act (State Law).

The facility proposes to build a new Retention Basin in 2018 to reroute all waste streams that are currently discharged to the Ash Pond. This change is necessary to decommission the existing Ash Pond and meet the requirements of Coal Ash Management Act. After the Retention Basin is completed all the waste streams previously discharged to Ash Pond will be re-routed to the Retention Basin, and the discharges to Ash Pond will cease.

- Outfall 001 is comprised of once through, non-contact condenser cooling water. This outfall discharges to the South Fork Catawba River.
- Outfall 002 is the ash basin discharge. This outfall includes domestic wastewater, stormwater from the coal pile area, miscellaneous stormwater flows, ash sluice, wastewater from turbine non-destructive testing, a yard drain sump, water treatment filter backwash, treated groundwater, laboratory wastes, and the power house sump at Unit 5. The domestic waste is pre-treated by a septic tank. Outfall 002 wastewater is treated using chemical coagulation, settling, and pH neutralization. This outfall discharges to the Catawba River.
- Outfall 002A is an intermittent discharge of emergency overflows from coal yard sump (discharge from coal handling and storage areas). This outfall discharges to the Catawba River.
- Outfall 002B is an intermittent discharge of emergency overflows from power house sump (floor wash water, boiler blowdown, water treatment waste, condensates, equipment cooling water, sealing water and miscellaneous leakage). This outfall discharges to the Catawba River.
- Outfall 003 is miscellaneous once through non-contact cooling water and seal water. This outfall discharges to the South Fork Catawba River.
- Outfall 004 is also miscellaneous once through non-contact cooling water. This outfall includes a small amount of intake screen backwash and car wash rinse water. This outfall discharges to the Catawba River.
- Outfall 005 is internal, discharging to the Ash Pond. It is comprised of flue gas desulfurization wastewater. The treatment facilities at this outfall consist of flow equalization, pH stabilization using lime addition, chemical precipitation, clarification, gravity filtration, biological selenium removal, aerated sludge holding, and a sludge filter press.
- Proposed Outfall 006 is Retention Basin discharge. This outfall includes domestic wastewater, stormwater from the coal pile area, miscellaneous stormwater flows, ash sluice, wastewater from turbine non-destructive testing, a yard drain sump, water treatment filter backwash, treated groundwater, laboratory wastes, and the power house sump at Unit 5. The domestic waste is pre-treated by a septic tank. Outfall 002 wastewater is treated using chemical coagulation, settling, and pH neutralization. This outfall discharges to the Catawba River.
- Proposed Outfall 007 is internal, discharging to the Retention Basin. It is comprised of flue gas desulfurization wastewater. The treatment facilities at this outfall consist of flow

equalization, pH stabilization using lime addition, chemical precipitation, clarification, gravity filtration, biological selenium/nitrate removal, aerated sludge holding, and a sludge filter press.

- Proposed Outfall 008 is the emergency spillway of the retired Ash Pond. The spillway is designed for a flood greater than 100-year event. Sampling of this spillway is waived due to unsafe conditions associated with sampling during overflow event. This outfall discharges to the Catawba River.
- Proposed outfall 009 is internal, discharging to the Retention Basin. It is comprised of the coal yard runoff and backwash from preheater washes. The discharge will be treated in the holding basin by adding polymers and adjusting pH.
- Proposed Toe Drain Outfalls 103 and 104 2 potentially contaminated toe drains. These outfalls discharge to the Catawba River.
- Proposed Seep Outfalls 102, 108, 108B, 110 (discharges through the stormwater basin): 4 potentially contaminated groundwater seeps. These outfalls discharge to the Catawba River.

SEEPS/TOE DRAUNS -- OUTFALLS 102, 103, 104, 108, 108B, 110

Existing Discharges from Seepage

The facility identified 14 unpermitted seeps (12 non-engineered and 2 toe drains) from the ash settling basin. However, S-1 does not need coverage under the permit based on the low concentration of the constituents associated with the coal ash. The concentrations of B, Se, and As in this seep are below detection level. Seeps S-8C, S-11 and S-12 do not discharge to the "Waters of the State". These seeps are not considered point-source wastewater discharges under the Clean Water Act. The pipe carrying seepage from S-9 has been grouted and no longer discharges. Therefore, this seep also does not need coverage.

Staff report from the Regional Office indicates that seeps S-5, S-6, and S-7 could be under water at higher lake levels and sampling at these locations may pose a safety concern. It also states that seeps S-3 and S-4 might serve as a representative sampling locations in lieu of S-5, S-6, and S-7. Therefore, sampling for S-5, S-6, and S-7 will not be required in the permit.

The locations of the permitted seeps are identified below and are depicted on the map attached to the permit.

Seep ID	Latitude	Longitude	Outfall number
S-2	35º10.426'	8100.344'	102
S-3 (toe drain)	35º10.513'	8100.360'	103
S-4 (toe drain)	35º10.513'	8100.360'	104
S-8	35º10.706'	8100.391'	108

Table 1.	Discharge Coordinates and Assigned Outfall Numbers

S-8B	35º10.41'	81º0.23'	108B
S-10	35º10.50'	8100.49'	110

The outfall for these discharges is through an effluent channel meeting the requirements in 15A NCAC 2B .0228. Within 180 days of the effective date of this permit, the permittee shall demonstrate, through in-stream sampling meeting the requirements of condition A. (28.), that the water quality standards in the receiving stream are not contravened.

Discharges from Seepage Identified After Permit Issuance

The facility shall comply with the "Plan for Identification of New Discharges" as contained in Attachment 2. For any discharge identified pursuant to this Plan, the facility shall, within 90 days of the seep discovery, determine if the discharge seep meets the state water quality standards established in 15A NCAC 2B .0200 and submit the results of this determination to the Division. If the standards are not contravened, the facility shall conduct monitoring for the parameters specified in A. (13.).

If any of the water quality standards are exceeded, the facility shall be considered in violation until one of the options below is fully implemented:

- Submit a complete application for 404 Permit (within 30 days after determining that a water quality standard is exceeded) to pump the seep discharge to one of the existing outfalls, install a pipe to discharge the seep to the Catawba River, or install an *in-situ* treatment system. After the 404 Permit is obtained, the facility shall complete the installation of the pump, pipe, or treatment system within 180 days from the date of the 404 permit receipt and begin pumping/discharging or treatment.
- 2) Demonstrate through modeling that the decanting and dewatering of the ash basin will result in the elimination of the seep. The modeling results shall be submitted to the Division within 120 days from the date of the seep discovery. Within 180 days from the completion of the dewatering the facility shall confirm that the seep flow ceased. If the seep flow continues, the facility shall choose one of the other options in this Special Condition.
- 3) Demonstrate that the seep is discharging through the designated "Effluent Channel" and the water quality standards in the receiving stream are not contravened. This demonstration should be submitted to the Division no later than 180 days from the date of the seep discovery. The "Effluent Channel" designation should be established by the DEQ Regional Office personnel prior to the issuance of the permit. This permit shall be reopened for cause to include the "Effluent Channel" in a revised permit.

All effluent limits, including water quality-based effluent limits, remain applicable notwithstanding any action by the Permittee to address the violation through one of the identified options, so that any discharge in exceedance of an applicable effluent limit is a violation of the Permit as long as the seep remains flowing.

New Identified Seeps

If new seeps are identified, the facility shall follow the procedures outlined above. The deadlines for new seeps shall be calculated from the date of the seep discovery. The new identified seep is not permitted until the permit is modified and the new seep included in the permit and the new outfall established for the seep.

TOE DRAINS - OUTFALLS 103 AND 104

The Allen Active Ash Basin dam consists of the north dike and the east dike. Both dikes have internal drainage systems. Any surface water flow from these drainage systems will pass through seep

locations S-3 or S-4. Toe drains have been incorporated into the permit under the Outfall 103 and Outfall 104.

ASH POND DAMS

Seepage through earthen dams is common and is an expected consequence of impounding water with an earthen embankment. Even the tightest, best-compacted clays cannot prevent some water from seeping through them. Seepage is not necessarily an indication that a dam has structural problems, but should be kept in check through various engineering controls and regularly monitored for changes in quantity or quality which, over time, may result in dam failure.

REASONABLE POTENTIAL ANALYSIS (RPA)-OUTFALL 002, OUTFALL 006, OUTFALLS 101, 102, 103, 104, 108, 108B, AND 110.

The Division conducted EPA-recommended analyses to determine the reasonable potential for toxicants to be discharged at levels exceeding water quality standards/EPA criteria by this facility. For the purposes of the RPA, the background concentrations for all parameters were assumed to be below detections level. The RPA uses 95% probability level and 95% confidence basis in accordance with the EPA Guidance entitled "Technical Support Document for Water Quality-based Toxics Control." The RPA included evaluation of dissolved metals' standards, utilizing a default hardness value of 25 mg/L CaCO₃ for hardness-dependent metals. The RPA spreadsheets are attached to this Fact Sheet.

a) RPA for Decanting of Ash Pond (Outfall 002).

The RPA was conducted for decanting of Ash Pond, Calculations included: As, Be, Cd, Chlorides, Total Phenolic Compounds, Cr, Cu, CN, Pb, Hg, Mo, Ni, Se, Ag, Zn, Co, Sulfate, Ba, Sb, and Tl (please see attached). The flow of 18.9 MGD was used in the RPA as the highest reported flow during the last permit cycle. The RPA concludes that the limits for Ag are necessary to protect the receiving stream. In addition, the WQBELs for Cu will be substituted for TBELs, since WQBELs are more stringent.

b) RPA for Dewatering of Ash pond (Outfall 002).

To meet the requirements of the Coal Ash Management Act of 2014, the facility needs to dewater ash ponds by removing the interstitial water. The facility's highest discharge rate from the dewatering process will be 1.0 MGD. The facility submitted data for the standing surface water in the ash ponds, interstitial water in the ash, and interstitial ash water that was treated by filters of various sizes. To evaluate the impact of the dewatering on the receiving stream the RPA was conducted for the wastewater that will be generated by the dewatering process. To introduce the margin of safety, the highest measured concentration for a particular parameter was used. The RPA was conducted for As, Cd, Chlorides, Cr, Cu, F, Pb, Mo, Hg, Ni, Se, Zn, Sulfate, Ba, Sb, and Tl (please see attached). The flow of 1.0 MGD was used in the RPA. The RPA indicated no need for water-quality based limits during the dewatering phase.

c) RPA for Toe Drains (Outfalls 103 and 104).

The RPA was also conducted for the combined Toe Drains flow. Calculations included: As, Cd, Chlorides, Cr, Cu, F, Pb, Hg, Mo, Ni, Se Zn, Sulfate, Sb, and Tl (please see attached). The analysis indicates no reasonable potential to violate the water quality standards or EPA criteria. The flow volume for the combined Toe Drains flow was measured at 0.0091 MGD. However, the flow of 0.01 MGD was used for the RPA to incorporate a safety factor and account for potential increase in flow volume.

d) RPA for Seeps (Outfalls 102, 108, 108B, and 110).

The RPA was also conducted for the combined flow from the seeps. The analysis was based on the dilution in the receiving stream as a result of delineation of the effluent channels for all seeps. Calculations included: As, Cd, Chlorides, Cr, Cu, F, Pb, Hg, Mo, Ni, Se, Zn, Sulfate, Ba, Sb, and Tl (please see attached). The analysis indicates no reasonable potential to violate the water quality standards or EPA criteria. The flow volume for the combined seep flow was measured at 0.006 MGD. However, the flow of 0.5 MGD was used for the RPA to incorporate a safety factor, account for potential new seeps that might emerge in the future or increase in flow volume at the existing seeps.

 e) RPA for New Retention Basin (Outfall 006). The RPA that was conducted for Outfall 002 was used for Outfall 006 since the Retention Basin will be receiving all the waste streams that were previously discharged to Ash Pond.

The proposed permit requires that EPA methods 200.7 or 200.8 (or the most current versions) shall be used for analyses of all metals except for total mercury.

FGD TECHNOLOGY BASED EFFLUENT LIMITS-INTERNAL OUTFALL 005 AND INTERNAL OUTFALL 007.

The new federal 40 CFR 423 Technology Based Effluent Limits (TBELs) have been added to the permit:

Total Arsenic – 8.0 µg/L (Monthly Average); 11.0 µg/L (Daily Maximum)

Total Selenium – 12.0 µg/L (Monthly Average); 23.0 µg/L (Daily Maximum)

Total Mercury – 356.0 ng/L (Monthly Average); 788.0 ng/L (Daily Maximum)

Nitrate/nitrite as N – 4.4 mg/L (Monthly Average); 17.0 mg/L (Daily Maximum)

The federal rule 40 CFR 423 states that "dischargers must meet the effluent limitations for FGD wastewater in this paragraph by a date determined by the permitting authority that is as soon as possible beginning November 1, 2018, but no later than December 31, 2023". Duke is evaluating early retirement options for the facility. By December 31, 2017, Duke will make the determination on early retirement. If the decision is to retire the units by December 31, 2023, the ELG applicability date for FGD wastewater will be December 31, 2023. If the decision is not to retire the units by December 31, 2023, the ELG applicability date for FGD wastewater will be February 28, 2021. Duke provided the justification for the proposed deadline and the DWR concurred with the compliance date.

MERCURY EVALUATION- OUTFALL 002

The State of North Carolina has a state-wide mercury impairment. The TMDL has been developed to address this issue in 2012. The TMDL included the implementation strategy, both documents were approved by EPA in 2012.

The mercury evaluation	was conducted in	accordance with	the Permitting	Guidelines for Statewide
Mercury TMDL.				

Year	2010	2011	2012	2013	2014
Annual average	1.6	1.18	6.9	0.93	0.83
concentration (ng/L)					
Maximum sampling	2.4	1.8	22.6	1.6	1.0
result (ng/L)					
Number of samples	4	4	4	4	3

The allowable mercury concentration for this facility is 50.9 ng/L. All annual average mercury concentrations are below the allowable level. All maximum sampling results are below the TBEL of 47.0 ng/L. Based on the Permitting Guidelines for Statewide Mercury TMDL, the limits are not required.

CWA SECTION 316(a) TEMPERATURE VARIANCE - OUTFALL 001

The facility has a temperature variance. In order to maintain the variance the facility has to conduct annual biological and chemical monitoring of the receiving stream to demonstrate that it has a balanced and indigenous macroinvertebrate and fish community. The latest BIP (balanced and indigenous population) report was submitted to DWR in November of 2014. The DWR has reviewed the report and concluded that the receiving stream near Allen Steam Station has a balanced and indigenous macroinvertebrate and fish community.

CWA SECTION 316(b)

The permittee shall comply with the Cooling Water Intake Structure Rule per 40 CFR 125.95. The Division approved the facility request for an alternative schedule in accordance with 40 CFR 125.95(a)(2). The permittee shall submit all the materials required by the Rule with the next renewal application. Duke is involved in a large scale decommissioning of ash ponds, excavation of coal ash, landfilling of coal ash, construction of new treatment systems for FGD wastewater and other wastes, and conversion to zero liquid discharge for bottom ash. Under these circumstances, Duke is unable to develop comprehensive documentation required by 316(b) rule during this renewal.

INSTREAM MONITORING-OUTFALL 002

The permit required semi-annual upstream and downstream monitoring near the ash pond discharge. The upstream site (Station 250) is approximately 1.1 miles upstream of the discharge and downstream location (Station 235) is approximately 3 miles downstream of the discharge. These monitoring stations have been established through the BIP monitoring program, which was required to maintain the 316(a) temperature variance. The monitored parameters are: As, Cd, Cr, Cu, Hg, Pb, Se, Zn, turbidity, and Total Dissolved Solids (TDS). The majority of the results are below detection level (Hg, As, Cd, Cr, Pb, Se), the rest of the results are below water quality standards (Cu, Zn, TDS). No parameter demonstrated any increase in the concentration at the monitoring stations below the discharge.

It is required that the monitoring of the instream stations will continue during the next permit cycle. It is also required that the facility uses low level method 1631E for all Hg analysis.

FISH TISSUE MONITORING-NEAR OUTFALL 002

The permit required fish tissue monitoring for As, Se, and Hg near the ash pond discharge once every 5 years. This frequency is consistent with EPA guidance. Redear sunfish and largemouth bass tissues were analyzed for these trace elements. The results were below action levels for Se and Hg $(10.0 \ \mu g/g - Se, 0.4 \ \mu g/g - Hg, NC)$ and screening value for As $(1.2 - \mu g/g, EPA)$. These results are consistent with the previous monitoring results.

TOXICITY TESTING-OUTFALL 002 AND OUTFALL 006

Current Requirement:	Outfall 002 – Chronic P/F @ 20% using Ceriodaphnia
Recommended Requirement:	Outfall 002 – Chronic P/F @ 23.6% using Ceriodaphnia
_	Outfall 006 – Chronic P/F @ 23.6% using Ceriodaphnia

This facility has passed all toxicity tests during the previous permit cycle (20 out of 20), please see attached.

The Division will increase the Instream Waste Concentration from 20% to 23.6% due to the increased wastewater flow, reported as 18.9 MGD. For the purposes of the permitting, the long term average flow was used in conjunction with the 7Q10 summer flow was used to calculate the percent effluent concentrations to be used for WET.

COMPLIANCE SUMMARY

During the last 5 years, the facility has exceeded limits 4 times, please see attached. Three limit violations were for temperature (Outfall 001) and one limit violation was for Fe (Outfall 002).

PERMIT LIMITS DEVELOPMENT

- The temperature limits (Outfall 001) are based on the North Carolina water quality standards (15A NCAC 2B .0200) and 316(a) Thermal Variance.
- The limits for Oil and Grease and Total Suspended Solids (Outfalls 002, 002A, 002B, 004 (oil and grease only), 005, 006, 007, 009, 102, 103, 104, 108, 108B, and 110) were established in accordance with 40 CFR 423.
- The pH limits (Outfalls 002, 002A, 002B, 005, 006, 007, 102, 103, 104, 108, 108B, and 110) in the permit are based on the North Carolina water quality standards (15A NCAC 2B .0200).
- The limits for Total Copper and Total Iron (Outfalls 002, 002A, 002B, and 006) were established in accordance with 40 CFR 423.
- The turbidity limit in the permit (Outfall 002) is based on the North Carolina water quality standards (15A NCAC 2B .0200).
- The total silver limits in the permit (Outfall 002) are based on the North Carolina water quality standards (15A NCAC 2B .0200).
- The Technology Based Effluent Limits for Total Arsenic, Total Mercury, Total Selenium, and Nitrate/nitrite as N (Outfall 005 and Outfall 007) are based on the requirements of 40 CFR 123.
- The Whole Effluent Toxicity limit (Outfall 002 and Outfall 006) is based on the requirements of 15A NCAC 2B .0500.

PROPOSED CHANGES

- The Seep Outfalls 102, 108, 108B, and 110 (Please see A. (13.), A. (16.), A. (17), and A. (18.), and Discharge From Seepage Special Condition (Please see A. (30.)) were added to the permit.
- The Toe Drains Outfalls 103 and 104 (Please see A. (14.) and A. (15.)) were added to the permit.
- The turbidity limit was added to the permit (Outfall 002) to meet the state turbidity standard per 15A NCAC 2B .0211(3) (k).
- The pH limits were added to the permit (Outfalls 002A and 002B) to meet the state pH standard per 15A NCAC 2B .0200.
- The Technology Based Effluent Limits for Total Arsenic, Total Mercury, Total Selenium, and Nitrate/nitrite as N were added to the permit (Outfall 005 and Outfall 007) and are based on the requirements of 40 CFR 123.
- Monitoring for Chlorides was removed from the permit (Outfall 002) based on the results of Reasonable Potential Analysis.
- The Monitoring Frequency for As, Se, and Total Mercury was reduced to Quarterly (Outfall 005) based on the results of Reasonable Potential Analysis.
- Monitoring for COD, Total Cadmium, Total Chromium, Chlorides, Total Nickel, Total Silver, Total Zinc and Total Beryllium was removed from the permit (Outfall 005) based on the results of the discharge evaluation.
- Starting December 21, 2016, federal regulations require electronic submittal of all discharge monitoring reports (DMRs) and specify that, if a state does not establish a system to receive such submittals, then permittees must submit DMRs electronically to the Environmental Protection Agency (EPA). The final NPDES Electronic Reporting Rule was adopted and became effective on December 21, 2015.

The requirement to begin reporting discharge monitoring data electronically using the NC DWR's Electronic Discharge Monitoring Report (eDMR) internet application has been added to your final NPDES permit. (Please see A. (31.)) For information on eDMR, registering for eDMR and obtaining an eDMR user account, please visit the following web page:

http://deq.nc.gov/about/divisions/water-resources/edmr.

For more information on EPA's final NPDES Electronic Reporting Rule, please visit the following web site:

http://www2.epa.gov/compliance/final-national-pollutant-discharge-elimination-system-npdes-electronic-reporting-rule.

- The Applicable State Law Special Condition was added to the permit to meet the requirements of Senate Bill 729 (Coal Ash Management Act, Please see Special Condition A. (32.)).
- The Additional Conditions and Definitions Special Condition was added to the permit. Please see Special Condition A. (22.).
- Monitoring for Bromide was added to the Outfall 002 and the Instream Monitoring Special Condition (Please see A. (28.)) to address the comment from the Public Water Supply Section.
- Monitoring for Oil and Grease was added to the Internal Outfall 005 to meet the requirements of 40 CFR 423.
- Monitoring for Hardness was added to Outfall 002 and the Instream Monitoring Special Condition A. (28.) to assist in implementation of the new dissolved standards.
- The Outfall 006 was added to the permit to accommodate a future retention basin discharge.
- The IWC for the Whole Effluent Toxicity Test (Outfall 002) was increased to 23.6% based on the new flow data.
- The monitoring frequency for the Whole Effluent Toxicity was increased to Monthly (Outfall 002) to address the EPA comment.
- The monitoring frequency for the Total Arsenic, Total Selenium, and Total Mercury was increased to Weekly (Outfall 002) to address the EPA comment.
- The daily maximum limit for TSS was reduced to 50.0 mg/L (Outfall 002) to meet the requirements of 40 CFR 423.
- The Decanting and Dewatering Special Conditions were added to Outfall 002, please see A. (2.) and A. (3.).
- The internal Outfall 007 was added to the permit to accommodate discharge from the FGD treatment system.
- The Outfall 008 was added to the permit to accommodate discharge from the emergency spillway of the retired Ash Pond.
- The internal Outfall 009 was added to the permit to accommodate discharge from the coal yard runoff and backwash from preheater washes.
- The total silver limits were added to the permit (Outfall 002) based on the results of the Reasonable Potential Analysis.

PROPOSED SCHEDULE

Draft Permit to Public Notice:	November 1, 2016 (est.)
Permit Scheduled to Issue:	December 30, 2016 (est.)

STATE CONTACT

If you have any questions on any of the above information or on the attached permit, please contact Sergei Chernikov at (919) 807-6386 or sergei.chernikov@ncdenr.gov.