



Beaver Valley Power Station
Route 168
P.O. Box 4
Shippingport, PA 15077-0004

November 18, 2020
L-20-308

Ryan Decker, P.E.
Department of Environmental Protection, Clean Water Program
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, PA 15222

SUBJECT:
Beaver Valley Power Station (BVPS) Pre-Draft NPDES Permit No. PA0025615

Energy Harbor (EH), formerly FirstEnergy Nuclear Operating Company (FENOC), submits the attached comments in response to the comments from DEP regarding the pre-draft NPDES permit PA0025615 received August 10, 2020.

The comments are provided in spreadsheet format that track the progression of comment resolution. The far-right gold column contains the most recent comments. BVPS would appreciate an opportunity to talk through the details of these items at your earliest convenience.

Also included with this letter is an updated water balance diagram.

Should you have any questions regarding the attached comments and enclosed documents, please direct them to Amy Savage at aesavage@energyharbor.com or 724-682-7359.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew J. Enos".

Matthew J. Enos
General Plant Manager

ADD1
NRR

Beaver Valley Power Station, Unit Nos. 1 and 2

L-20-308

Page 2

Attachment(s):

1. BVPS comments for Pre-Draft NPDES Permit No PA0025615

Enclosure(s)

- A. Flow Diagram Waste Water, RM-0027F Rev. 18 Draft

cc: Document Control Desk US NRC (NOTE: No new US NRC commitments are contained in this letter.)
US Environmental Protection Agency

Pre-Draft NPDES Permit No. PA0025615					
Permit Section	Permit Page	Outfall	BVPS Comments (May 8, 2020)	PADEP Response (August 10, 2020)	BVPS Response (October 8, 2020)
A.I.A	2	101	1. The inline flowmeter is within the original discharge line routed to outfall 001. This sump is now discharged using a submersible sump pump with a flexible line which does not lend itself to installing a flowmeter. The discharge is initiated by an operator each time and an estimation can be performed based on pump capacity and runtime. BVPS is requesting estimated flow.	Changed.	Thank you.
			2. While this sump is the same location as the last permit, the conditions present are not the same; the discharge location is different. During outages, steam generators are drained to this location and treating for pH during this time will be a challenge. BVPS requests no maximum pH limits during steam generator draining activities.	The pH limits come from the federal regulations (423.12(b)(1)). No change.	Understood, Thank you.
			3. This sump accumulates water over several shifts prior to being manually pumped down. The nature of the water is consistent over time and a grab sample will be representative of the water; a composite sample will not differ from a grab. BVPS requests a grab sample for TSS.	Changed.	Thank you.
			4. Due to the location of this sump, effluents will be comprised of water solely from Unit 1. BVPS requests the statement "periods of wet layup" be amended to "periods of Unit 1 wet layup" to clarify the requirements.	The permit mentions wet layup in Footnote 5 in Part A of the permit. The footnote applies to more than just IMP 101 and clarifies when hydrazine and ammonia-nitrogen sampling is required for all monitoring points with those requirements. The flow diagram indicates that hydrazine is used within the Unit 2 systems at places that lead to one or more of the outfalls listed in that footnote. Is there wet layup for Unit 2? If not, when is hydrazine used in the Unit 2 systems? What should Footnote 5 say to capture the times when hydrazine is used and might be discharged from all outfalls with hydrazine and ammonia monitoring?	BVPS requests the wording for periods of wet layup be specific to the affected Unit. Periods of wet layup at Unit 1 impacts outfalls 001, 101, 403, 208, 003, and 007. Periods of wet layup at Unit 2 impacts outfalls 001, 010, 007, and 601.
A.I.D	5	601	1. Similar to IMP 401 and as stated on both fact sheets: "the effluent sources at IMP 601 are identified as low volume waste sources under 40CRFR423.11 and are subject to the TBELs listed in Table 1 in Section 101A of the fact sheet." Additionally, due to the location and relatively small volume of this sump treatment for pH will be logistically challenging and may create a safety hazard. BVPS requests no max pH at this location.	The pH limits come from the federal regulations (423.12(b)(1)). No change.	Understood, Thank you.
			2. TSS composite sampling type does not specify 8 or 24-hour collection. We are requesting this be clarified; however, this sump is a relatively small volume and operates on a float controlled submersible sump pump. Using a composite sampler will be challenging. BVPS requests grab sample for TSS.	Changed. "Composite" sampling was specified because the discharge duration was unknown. A "composite" sample still would have required multiple samples, but without specifying a duration (i.e., the duration over which to collect samples would have been dependent on the duration of each particular discharge event).	Thank you.
			3. Due to plant configuration during Unit 2 outages, the Unit 2 chem waste sump is not available. During these periods, all influents to this location are routed to another sump at Unit 2 prior to being pumped to the recirculating water system. BVPS requests 601 be "relocated" during outages to allow effluent sampling and parameter requirements be applied to the same water, however at a different physical location.	Similar to IMP 101 and Footnote 3, a description can be included to clarify that monitoring for IMP 601 applies to the same effluent, but at different locations at different times.	Please include similar language to IMP 101, Footnote 3 as a footnote to this location. Entrance of a statement at this IMP will reduce confusion for permit compliance. Different locations can be used at different times to collect this waste water, however the permit requirements remain regardless of location.
A.I.E	6	001	1. Based on plant process, there is no reason to believe mercury is introduced to BVPS effluent streams. Additionally, permit renewal sampling for mercury demonstrated less than detectable concentrations and compliance with WQBELs and ORSANCO criterion. BVPS Requests removal of mercury monitoring requirement.	T.B.D.	When can BVPS expect a decision on mercury requirements? This will be a costly parameter to implement and will require new training for our technicians.
			2. Chromium, VI should not be present unless chromium-based additives are being used. BVPS requests same footnote (6) as given for the Chromium, Total parameter at this location to require sampling only when chromium additives are added to the cooling water.	BVPS did not use sufficiently sensitive methods (represented by DEP's Target Quantitation Limits) when analyzing for Chromium VI. Consequently, reasonable potential thresholds were exceeded, which led to the Chromium VI monitoring requirement. Regardless of whether BVPS introduces chromium, DEP cannot conclude from the available effluent analyses that Chromium VI is present in the discharge at a concentration that does not have a reasonable potential to violate water quality criteria. This was explained on p.38 of the Fact Sheet. BVPS can collect new samples and analyze for Chromium VI using lower Reporting Limits (preferably DEP's Target QL of 1.0 ug/L).	Sample results were forwarded to the PADEP on 9/22/2020 utilizing more sensitive methods. Please evaluate this parameter based on those new results.
			3. Currently there is not continuous temperature monitoring installed at this location. BVPS could potentially be challenged with meeting the 110F limit in the summer months. Temperature at this location has not been evaluated, however the site has been monitoring dissolved oxygen at this location and has not been challenged. Any requirement to monitor for temperature at this location should allow for time to acquire/design/install instrumentation. BVPS requests to continue monitoring for dissolved oxygen or for report-only effluent limitations for temperature.	Dissolved oxygen monitoring is not a requirement of the permit, so BVPS can continue D.O. monitoring at its discretion. The 110 degree F temperature limit is from ORSANCO's Pollution Control Standards (Section 3.3.F), which state: "The maximum temperature at any location where public access is possible, whether inside or outside a mixing zone, shall not exceed 110 degrees F to protect human health caused by exposure resulting from water contact." DEP will consider a time allowance to install instrumentation. How long would it take to install instrumentation?	BVPS will discontinue D.O. monitoring with issuance of the new permit. Additionally, in lieu of installed instrumentation, BVPS will utilize immersion stabilization method via a calibrated thermometer submersed in the waste water stream or a sample collection container.

		<p>4. The Fact Sheet for outfall 001 states, "the discharge pathway for equipment drainage to the Unit #2 recirculating water system is used for equipment drainage comprised of recirculating cooling water that generally is not routed to Oil/Water Separator #21 or #23." For clarification, equipment drainage to Unit 2 recirculating water system can be comprised of water from multiple plant systems and equipment. This is reflected on the waste water flow diagram.</p> <p>5. Based on plant process, BVPS has no reason to believe aluminum is introduced to this effluent stream. BVPS requests the removal of the aluminum monitoring requirement or a monitoring requirement for Aluminum only when the plant uses Al-based additives in cooling water.</p>	<p>The only reason DEP did not require low volume waste source limits on this wastewater prior to routing back into the recirculating cooling water loop is because the drainage was characterized as drainage of recirculating cooling water (regardless of where it drains from). If that characterization is not correct and drainage may consist of sources other than recirculating cooling water, then this source should be monitored internally for compliance with low volume waste source limits.</p> <p>The aluminum monitoring originates from DEP's reasonable potential analysis. The reported effluent concentration (820 ug/L) exceeds DEP's established thresholds for requiring monitoring--it is within 10% to 50% of the calculated WQBEL (2973 ug/L). As stated elsewhere in the Fact Sheet, there is no allowance for intake credits for WQBELs. It doesn't matter if BVPS adds aluminum or not--the reported effluent concentration exhibits reasonable potential.</p>	<p>This pathway is comprised of varying sources of process water, recirculating cooling water, and non contact cooling water. The volume varies based on plant operations and equipment draining. The chem waste sump will be used in addition to another sump for the collection and treatment of waste water prior to discharge. In this case an additional IMP (701) will be required to monitor these pathways separately.</p> <p>BVPS will implement methods to sample and analyze for aluminum at Outfall 001.</p> <p>BVPS anticipates that we may be challenged with meeting the target QLs for the Iron, Total and TDS analyses. We already anticipate having to change from our current lab to a new lab that can better meet the required QL's. Still, we may be challenged with meeting the 20 ug/L QL for Iron and the 2.0 mg/L for TDS. What are our options in this case?</p>
A.I.F	8	102	For clarification, BVPS requests the "type of effluent" description be amended to "Intake cubicle sumps (pump bearing cooling water leakage)."	Changed. Thank you.
A.I.J	11	303	For clarification, BVPS requests the "type of effluent" description be amended to "Unit #1 main plant floor and equipment drains treated by an oil/water separator (OWS #303)."	Changed. Thank you.
A.I.J	12	403	1. For clarification, BVPS requests the "type of effluent" description be amended to "Unit #1 SW Circ Pit receiving wastewater from equipment drains and intermittent discharges of condensate blowdown."	Changed. Thank you.
			2. BVPS has provided an updated wastewater flow diagram to clarify the discharge pathway of this outfall. Effluents discharging in the normal pathway to the clarifier are monitored at IMP 103. BVPS requests effluent limitations be required only when the alternate discharge pathway to MH1834 occurs.	If there is no discharge at IMP 403 because the oil/water separator bypass line is not being used, then BVPS would report "no discharge". Understood, Thank you.
A.I.K	13	003	1. BVPS requests clarification on "type of effluent" – BVPS requests this location be stormwater and Unit 1 Diesel Generator NCCW only as in previously permit revision. The sampling location for 003 has historically been upstream of co-mingling with 103, 303, and 403. Permit renewal sampling was conducted at a location downstream of co-mingling to capture the outfall as a whole. Sampling at the co-mingled location requires drawing up a sample from the bottom of an extremely deep manhole. This sample location requires physical intervention by the analyst as the pump can only draw the sample part of the way up, this would prevent the collection of a 24hr composite for Hexavalent Chromium, Aluminum, and Silver using an ISCO sampler. BVPS is requesting 003 sample point to remain stormwater and NCCW only prior to co-mingling.	BVPS has located an additional sample point downstream of IMP mixing which allows the sample stream to be accessible by ISCO. This allows WQBELs to be implemented at the location nearest the outfall pipe and is representative of all IMPs prior to discharge to the Ohio River. The new 003 location shall be representative of the whole discharge (all IMPs and Stormwater mixing). BVPS requests the current 003 location, upstream from mixing with IMPs, to remain stormwater and NCCW only to be utilized for stormwater samples. This will result in the sampling location for stormwater samples being taken from a different location than the final Outfall 003 samples, however it will be more representative of stormwater quality.
			2. The co mingled sampling location for 103, 303, 403 and stormwater is the bottom of an extremely deep manhole. It will be physically impossible to install a flow meter in the pipe leaving this manhole. BVPS is requesting estimated flow to be based on the influent flows of each contributing internal monitoring point.	T.B.D. - see above response on Outfall 003 effluent limit and sampling options.
			3. Survey was completed for this outfall regarding Al WQBEL. Aluminum presence in this outfall is likely due to water treatment chemicals which would be present at IMP 103. BVPS requests monitoring requirement for Aluminum at IMP 103 instead of Outfall 003.	See above response on Outfall 003 effluent limit and sampling options.
			4. Based on plant process, there is no reason to believe mercury is introduced to BVPS effluent streams. Additionally, permit renewal sampling for mercury demonstrated less than detectable concentrations and compliance with WQBELs and ORSANCO criterion. BVPS Requests removal of mercury monitoring requirement.	T.B.D. When can BVPS expect a decision on mercury requirements? This will be a costly parameter to implement and will require new training for our technicians.
			5. Due to the location, effluents will be comprised of water solely from Unit 1. We are requesting "periods of wet layup" be amended to "periods of unit 1 wet layup" to clarify the requirements.	See response to IMP 101 line 4 for outfall distinction between the units during wet layup conditions.

			1. Currently there is not continuous temperature monitoring installed at this location. BVPS could potentially be challenged with meeting the 110F limit in the summer months. Temperature at this location has not been evaluated, however the site has been monitoring dissolved oxygen at outfall 001 and has not been challenged. Any requirement to monitor for temperature at this location should allow for time to acquire/design/install instrumentation. BVPS requests to continue monitoring for dissolved oxygen at 001 or for report-only effluent limitations for temperature.	Dissolved oxygen monitoring is not a requirement of the permit, so BVPS can continue D.O. monitoring at its discretion. The 110 degree F temperature limit comes from ORSANCO's Pollution Control Standards (Section 3.3.F), which state: "The maximum temperature at any location where public access is possible, whether inside or outside a mixing zone, shall not exceed 110 degrees F to protect human health caused by exposure resulting from water contact." DEP will consider a time allowance to install instrumentation. How long would it take to install instrumentation?	BVPS will discontinue D.O. monitoring with issuance of the new permit. Additionally, in lieu of installed instrumentation, BVPS will utilize immersion stabilization method via a calibrated thermometer submerged in the waste water stream or a sample collection container.
A.I.M	15	004	2. Based on plant process, BVPS has no reason to believe aluminum is introduced to this effluent stream. BVPS requests the removal of the aluminum monitoring requirement or a monitoring requirement for Aluminum only when the plant uses Al-based additives in cooling water.	As stated in the Fact Sheet, DEP has concerns about acute impacts caused by aluminum in Outfall 004's discharges. It is not necessary for BVPS to introduce aluminum for aluminum to be a pollutant of concern that requires monitoring. Outfall 004's effluent quality may be similar to 001's effluent quality, which did exhibit 'reasonable potential'.	Sample results were forwarded to the PADEP on 9/22/2020 utilizing more sensitive methods. Please evaluate this parameter based on those new results.
			3. Based on plant process, there is no reason to believe mercury is introduced to BVPS effluent streams. Additionally, permit renewal sampling for mercury demonstrated less than detectable concentrations and compliance with WQBELs and ORSANCO criterion. BVPS Requests removal of mercury monitoring requirement.	T.B.D.	When can BVPS expect a decision on mercury requirements? This will be a costly parameter to implement and will require new training for our technicians.
			4. This outfall was not incorporated in permit renewal sampling as it was not actively discharging at the time. We request the opportunity to resample and demonstrate compliance below target QL for silver, similar to those stated on table 2 of the DEP letter dated April 9, 2020. This request was granted by email from R. Decker 5-4-20.	Waiting for results.	Sample results were forwarded to the PADEP on 9/22/2020 utilizing more sensitive methods. Please evaluate this parameter based on those new results.
			5. Chromium, VI should not be present unless chromium-based additives are being used. Request same footnote (6) as given for the Chromium, Total parameter at this location to require sampling only when chromium additives are added to the cooling water.	Outfall 004's effluent quality may be similar to 001's effluent quality, which did exhibit 'reasonable potential'. If resampling and additional analyses at Outfall 001 and 004 using lower Reporting Limits demonstrate that chromium VI is not detectable at concentrations exhibiting 'reasonable potential', then the monitoring will be removed.	Sample results were forwarded to the PADEP on 9/22/2020 utilizing more sensitive methods. Please evaluate this parameter based on those new results.
			1. Based on the configuration of the outfall discharge line, in-line temperature measurement would be a challenge. Temperature measurement would need to be obtained by I-S in a grab sample. Temperature at this location has not been evaluated BVPS could potentially be challenged with meeting the 110F limit in the summer months. BVPS requests report-only effluent limitations from a grab sample for temperature at this location.	The 110 degree F temperature limit comes from ORSANCO's Pollution Control Standards (Section 3.3.F), which state: "The maximum temperature at any location where public access is possible, whether inside or outside a mixing zone, shall not exceed 110 degrees F to protect human health caused by exposure resulting from water contact."	BVPS will utilize immersion stabilization method via a calibrated thermometer submerged in the waste water stream or a sample collection container.
A.I.O	17	007	2. Based on plant process, the treatment chemicals Hydrazine, Ammonia and H150M would not be present at this location. BVPS is requesting removal of these parameters.	Section E4 of the flow diagram indicates that hydrazine and quaternary amine are or may be introduced to the Unit #1 Primary & Secondary Heat Exchangers & Chillers either directly or through the screened intake water feed. The alternative flow path from those units leads to Outfall 007 during outages. Per Footnote 12 in the pre-draft permit (p.35), analyses for hydrazine, ammonia, and H150M (among other parameters) would apply at Outfall 007 when alternative flow path is activated.	For clarification, the closed loop side of the heat exchanger(s) is maintained with certain concentrations of chemicals TTA, Molybdate, Hydrazine, Sodium Nitrite. The closed loop does not discharge or blow down to any outfalls. Rarely the system will need to be drained for maintenance. The only time closed loop chemicals would reach Outfall 007 would be if a heat exchanger would develop a tube leak or there is some other mechanical failure. This may have been unclear from looking at the drawing. Additionally, Hydrazine from SGs during periods of wet layup does not have a drainage pathway to Outfall 007. Treatment of H150M is an infrequently used chemical which would not typically be initiated during reverse flow path usage of 007. In the event H150M is added, analyses will be completed as required.
			3. Discharges of cooling water from the Unit #1 heat exchangers and chillers may contain residual chlorine; however, no analysis for TRC WQBELs is performed. Since no TRC WQBELs apply to Outfall 001's 36 MGD discharge, it is reasonable to conclude that TRC WQBELs also do not apply to a 9.6 MGD discharge from Outfall 007." BVPS requests TRC limits at outfall 007 remain the same as the current permit concentrations.	The TRC limit at Outfall 007 is a technology-based effluent limit (TBEL) imposed on discharges of once-through cooling water by the federal regulations (40 CFR § 423.13(b)(1)). WQBELs for TRC may not apply, but TBELs do.	Understood, Thankyou.
A.I.Q	19	208	BVPS will not pursue discharge of this effluent through the requested pathway. BVPS has provided an updated wastewater flow diagram to remove this proposed outfall.	IMP 208 is deleted.	Understood, Thankyou.
			1. Currently there is not continuous temperature monitoring installed at this location. BVPS could potentially be challenged with meeting the 110F limit in the summer months. Temperature at this location has not been evaluated, however the site has been monitoring dissolved oxygen at outfall 001 and has not been challenged. Any requirement to monitor for temperature at this location should allow for time to acquire/design/install instrumentation. BVPS requests to continue monitoring for dissolved oxygen at 001 or for report-only effluent limitations for temperature.	Dissolved oxygen monitoring is not a requirement of the permit, so BVPS can continue D.O. monitoring at its discretion. The 110 degree F temperature limit comes from ORSANCO's Pollution Control Standards (Section 3.3.F), which state: "The maximum temperature at any location where public access is possible, whether inside or outside a mixing zone, shall not exceed 110 degrees F to protect human health caused by exposure resulting from water contact." DEP will consider a time allowance to install instrumentation. How long would it take to install instrumentation?	BVPS will discontinue D.O. monitoring with issuance of the new permit. Additionally, in lieu of installed instrumentation, BVPS will utilize immersion stabilization method via a calibrated thermometer submerged in the waste water stream or a sample collection container.

			2. Based on plant process, there is no reason to believe mercury is introduced to BVPS effluent streams. Additionally, permit renewal sampling for mercury demonstrated less than detectable concentrations and compliance with WQBELs and ORSANCO criterion. BVPS Requests removal of mercury monitoring requirement.	T.B.D.	When can BVPS expect a decision on mercury requirements? This will be a costly parameter to implement and will require new training for our technicians.
A.I.S	21	010	3. Based on plant process, the treatment chemicals Hydrazine and ammonia would not be present at this location. BVPS is requesting removal of these parameters.	Section E6 of the flow diagram indicates that hydrazine is or may be added to the Unit #2 Primary & Secondary Heat Exchangers & Chillers.	The Primary and Secondary heat exchangers and chillers depicted on the water balance actually have a service water side (cooling water) and a closed-loop side that transfers heat from plant equipment. The service water side is once-thru cooling flow that discharges to Outfall 010 at Unit 2. The chemical additives used in the service water are Sodium Hypochlorite, Sodium Bromide, Dispersant, H150M, and a H_3PO_4 based corrosion inhibitor. Separately, the closed loop side of the heat exchanger(s) is maintained with certain concentrations of chemicals TTA, Molybdate, Hydrazine, Sodium Nitrite. The closed loop does not discharge or blow down to any outfalls. Rarely the system will need to be drained for maintenance. The only time closed loop chemicals would reach Outfall 010 would be if a heat exchanger develops a tube leak or there is some other mechanical failure. In that case, the possibility exists for a small amount of Hydrazine to be discharged before the leak can be isolated. Given that this scenario is unlikely, BVPS further requests the removal of these parameters. BVPS requests the opportunity to verbally discuss this outfall further to reduce confusion.
			4. Per 010.B, "Discharges of cooling water from the Unit #2 heat exchangers and chillers may contain residual chlorine; however, no analysis for TRC WQBELs is performed. Since no TRC WQBELs apply to other discharges with higher flow rates (001 and 007), it is reasonable to conclude that TRC WQBELs also do not apply to a 3.1 MGD discharge from Outfall 010." BVPS requests TRC limits at outfall 010 remain the same as the current permit concentrations.	The TRC limit at Outfall 010 is a technology-based effluent limit (TBEL) imposed on discharges of once-through cooling water by the federal regulations (40 CFR § 423.13(b)(1)). WQBELs for TRC may not apply, but TBELs do.	Understood, Thank you.
A.I.V	24	011	1. Based on plant process, there is no reason to believe mercury is introduced to BVPS effluent streams. Additionally, permit renewal sampling for mercury demonstrated less than detectable concentrations and compliance with WQBELs and ORSANCO criterion. BVPS Requests removal of mercury monitoring requirement.	T.B.D.	When can BVPS expect a decision on mercury requirements? This will be a costly parameter to implement and will require new training for our technicians.
A.I.V	24	011	2. As a BMP, BVPS inspects all batch discharges of accumulated storm water for the presence of any visual contaminates prior to discharge. BVPS seeks to clarify the statement on page 69 of the fact sheet: "FENOC stated that normal plant configuration does not allow for water in the areas that contribute to the sump, but there are no data on this source and FENOC noted that it inspects rainwater intrusion for oil sheen, which suggests a source for oil could be present." This BMP does not imply a source of oil is present.	Generally, one does not look for something that could never be present. However, DEP understands that the visual inspection is a generalized effluent quality check. The statement in the Fact Sheet only notes that inspecting a wastewater for oil sheen suggests that a source of oil could be present (e.g., from some unknown or transient source), not that a source of oil is present.	Understood, Thank you.
A.I.X	26	012	Survey completed for this outfall regarding Cu WQBEL. Copper presence in this outfall is likely due to domestic water make-up to the ERF Evaporative Cooler.	Copper WQBELs will take effect on the effective date of the permit (no schedule of compliance).	Understood, Thank you.
A.I.Z	28	013	Process water component of this outfall is monitored at IMP 313. The remaining influents for 013 are stormwater only. BVPS requests the monitoring requirements of this outfall align with stormwater monitoring requirements.	The weekly and monthly monitoring requirements at Outfall 013 are based on a reasonable potential analysis. The monitoring requirements for metals were imposed because BVPS did not use sufficiently sensitive analytical methods that achieved DEP's target QLs, so resampling and obtaining results less than DEP's target QLs would result in the removal of those requirements. If there is no resampling, the water quality-based monitoring requirements could be moved to IMP 313 since that is the effluent source that would occur at the Q7-10 design conditions used to develop the limits. As stated on p.76 of the Fact Sheet, BVPS would lose the benefit of storm water dilution, but the discharge is not subject to numerical WQBELs, so the benefits of dilution presumably would not be a concern to BVPS.	Sample results were forwarded to the PADEP on 9/22/2020 utilizing more sensitive methods. Please evaluate these parameters based on those new results. Following evaluation, if additional parameters above stormwater requirements are required BVPS will comply with additional parameters at outfall 013 as applicable.
A.III.C.3	42		Based on BVPS plant processes, this section is not applicable. BVPS requests to remove this section.	The conditions in Part A.III of the permit are standardized conditions that appear in all individual NPDES permits issued in the state. The referenced sections include statements concerning the applicability of the requirements. If BVPS does not meet those applicability requirements, then BVPS is unaffected by those conditions. DEP will review its policy for the modification of standard conditions and consider BVPS's request when preparing the draft permit.	Thank you for the consideration, BVPS understands that in the event this language is not removed, the site is not beholden to the conditions if the applicability requirements are not met.

C.I.F	51	BVPS requests clarification on this requirement. Does "the stream" refer to the receiving stream? What outfall does this apply to? How should the facility demonstrate compliance with this?	Stream refers to the receiving stream(s). 25 Pa. Code § 96.6(b) imposes this requirement on heated wastewater discharges. The permit would include monitoring requirements necessary to demonstrate compliance if DEP determined that BVPS was likely to violate the limit. DEP did not identify that BVPS's heated discharges risk violating the limit, which is why additional monitoring requirements to demonstrate compliance are not included. Regardless of whether there is reasonable potential, the condition is imposed in the permit as a regulatory requirement.	BVPS understands that additional monitoring requirements to demonstrate compliance are not included in the proposed permit.
C.III.B.1	56	BVPS requests removal of the word "Material" from Material Safety Data Sheet	Changed.	Understood, Thank you.
C.IV.B	56	BVPS requests the DEP annual report template be attached to the permit and permission to submit electronically.	The Annual Report template and the other supplemental reports required by the permit will be included with the final permit. The various supplemental report templates can be viewed here: https://www.dep.pa.gov/Business/Water/CleanWater/WastewaterMgmt/DischargeMonitoring/Pages/DMRSupplementalReports.aspx The Stormwater Annual Report will follow the format of the Annual Report for the 2016 PAG-03 General Permit.	Thank you for providing this link.
C.V	62	1. Based on plant processes, BVPS requests that outfall 403 is removed and outfall 003 is added to effluent limitations and monitoring requirements. 2. BVPS requests clarification, Is the quarterly report requirement for biocide amount met with the daily chemical additives report attached to the monthly DMR? Is a separate report required? 3. The permit states: "Quarterly reports on the amount of biocide uses [typo - USED], dates and times of product addition shall be recorded and submitted to the Department." BVPS request clarification on the receiving department.	This will be changed and Outfall 007 will be added (see DEP response to comments on Outfall 007 whereby biocide might be present at Outfall 007) because the detoxification should be completed before the biocide is discharged to the environment through an outfall. Biocide usage would be reported on the Chemical Additives reporting form, but other details on macrofouling pertaining to detoxification and detoxificant discharge concentrations (e.g., the 35 mg/L limit) would not be captured by that form, thus the additional reporting requirement in this condition.	Understood, Thank you. Understood. This quarterly document will be completed as written.
			The typo will be corrected. BVPS should be able to submit the reports as attachments in the eDMR system along with the other supplemental reports required by the permit.	Understood. BVPS will complete this report as a supplemental document and attach it to the applicable monthly DMR.

PA 0025615

