

## **Section V                      Comments on Revised Requirements for Internal Outfall 010**

### **Comment V.A:**

Mirant comments that:

Part I.A.4 of the draft permit involves the effluent from the Unit 1 floor drains, which consists of vacuum and pump seal water, fuel heater room discharges, and boiler leakage. The current permit authorizes discharge of this wastewater through an oil/water separator and internal Outfall 010. Mirant Canal's normal practice is to send that wastewater to the Unit 1 precipitator pumphouse for reuse in the precipitator ash sluice system, but Mirant Canal retains Outfall 010 as a backup in case that system is unavailable. The last discharge through Outfall 010 occurred in 1994.

The proposed permit would continue to authorize use of Outfall 010 for that wastewater, but "during emergencies only." Part I.A.4 at p. 5 of 20. That is too restrictive because the need to use Outfall 010 may arise during planned outages of the precipitator system or for other operational reasons not necessarily qualifying as an emergency. The use of the oil/water separator and the monitoring requirements on this discharge are more than sufficient to assure that the internal discharge of these wastewaters, if it occurs, does not have the reasonable potential to cause any problems. The final permit should continue to authorize discharge of these wastewaters through Outfall 010 as operational needs require.

Also, the proposed permit would require 24-hour notice to EPA and DEP, plus a written report in five (5) business days, whenever there is a discharge from this outfall. But these routine wastewaters, even if they utilize Outfall 010, do not warrant such special reporting. Again, the use of the oil/water separator and the monitoring requirements, which would lead to reporting on the monthly discharge monitoring reports, are fully adequate.

### **Response V.A:**

The Draft Permit requirement authorizing the use of outfall 010 during "emergencies only" was based on information EPA gathered during permit development, including personal communication with Mirant staff during a site visit on December 8, 2004. *See* EPA Site Visit Report for Mirant Canal Station, December 8, 2004. Based on the new information above, EPA agrees that Mirant Canal should be able to use this outfall during planned outages of the precipitator system or for other operational reasons and has removed this emergency only requirement from the Final Permit. All discharges from outfall 010, for whatever reason, are subject to permit limits and monitoring conditions required by Part I.A.4. The reporting requirement, Part I.A.4.a, has also been removed as it pertained to emergency situations.