

Application Type Renewal  
Facility Type Industrial  
Major / Minor Minor

**NPDES PERMIT FACT SHEET  
RE-DRAFT**

Application No. PA0009741  
APS ID 343404  
Authorization ID 1020570

**Applicant and Facility Information**

Applicant Name	<u>Exelon Generation Co. LLC</u>	Facility Name	<u>Exelon Muddy Run Pumped Storage Facility</u>
Applicant Address	<u>300 Exelon Way, Suite 310 Kennett Square, PA 19348</u>	Facility Address	<u>Road #1 Drumore, PA 17518</u>
Applicant Contact	<u>Angela Ward</u>	Facility Contact	<u>Donna Fabrizio</u>
Applicant Phone	<u>(410) 470-0246</u>	Facility Phone	<u>(410) 457-2516</u>
Client ID	<u>147686</u>	Site ID	<u>252351</u>
SIC Code	<u>4911</u>	Municipality	<u>Drumore Township</u>
SIC Description	<u>Trans. &amp; Utilities - Electric Services</u>	County	<u>Lancaster</u>
Date Published in PA Bulletin	<u>April 13, 2019</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>May 13, 2019</u>	If No, Reason	<u></u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Industrial</u>		

**Internal Review and Recommendations**

A draft permit for this application was issued on April 1, 2019, and was published in the PA Bulletin on April 13, 2019. Comments were received from the Exelon Generation Company on May 14, 2019.

The following are summaries of the comments received by Exelon. The comment letter has been included as an attachment.

- Under the header of "type of effluent" for Outfall 004 in the NPDES permit, Exelon would like to include the following description, "river water from tanks used during the execution of fish related studies." This is due to periodic fish studies that are conducted as required by the 401 Water Quality Certification.
- With the added monitoring of treated sanitary wastewater for Outfall 401, all parameters maintain a listed concentration limit except for ammonia-nitrogen. Exelon proposed a limited testing period of one year for the Ammonia-Nitrogen monitoring parameter included in the permit for Outfall 401. If Outfall 401 consistently indicates < 2.0 mg/l during the 12 months of testing, Exelon would like to remove this requirement from the permit.
- The previous permit provided the following statement: "Effective disinfection to control disease producing organisms from the period of May 1 to September 30 shall be the production of an Internal Monitoring Point 401 which will contain a concentration not greater than 200/100mL of Fecal Colonies, nor greater than 1000/100mL of these colonies in more than 10 percent of the samples tested." Exelon noted that this footnote was not included in the draft permit, and requested that it be added back in. They stated the footnote is necessary to provide protection to the permit in the event of a false positive test.

Approve	Return	Deny	Signatures	Date
			Benjamin R. Lockwood / Environmental Engineering Specialist	August 30, 2019
			Daniel W. Martin, P.E. / Environmental Engineer Manager	
			Maria D. Bebenek, P.E. / Program Manager	

**Internal Review and Recommendations**

4. In the NPDES Permit Part C Conditions, Part “B” of the Requirements Applicable To Stormwater Outfalls states that an Annual Storm Water Report template will be attached to the permit. The Draft NPDES Cover Letter stated that all templates are not copied in the draft, and will be added with the final permit. Exelon requested to review the Annual Storm Water Report prior to receiving the final permit.  
Part “C” of the Requirements Applicable To Stormwater Outfalls includes the statement, “This General Permit does not authorize dry weather discharges from dumpsters or roll off boxes.” Exelon requested that this statement be removed, as this is an individual permit and not a general permit.  
Part “F.1” of the Requirements Applicable To Stormwater Outfalls stats that monitoring shall be conducted at the representative outfalls identified in Part A of the permit, if applicable. Exelon’s interpretation is that this section does not apply.

In response, the “type of effluent” description listed in Comment 1 has been added to the permit.

For Comment 2 – the Ammonia-Nitrogen monitoring requirement for Outfall 401 has been removed from the permit. Flow from Outfall 401 combines with a large amount of non-process water and stormwater before discharging at Outfall 004. The ratio of the additional wastewater to the sewage effluent is 313:1, so there is a large amount of dilution available. Additionally, Outfall 004 discharges to the Susquehanna River, which also provides a large amount of dilution to the effluent; therefore, additional monitoring of Ammonia-Nitrogen is not necessary at the internal monitoring point Outfall 401. This is consistent with the existing permit requirements. The updated effluent limits for Outfall 401 are listed below, and have been revised in the NPDES permit and public notice.

The statement regarding effective disinfection from Comment 3 has been included in the permit.

A copy of the Annual Storm Water Report was made available to Exelon. The Part “C” statement has been modified to reflect that this is an individual permit. Exelon’s understanding is correct that the Part “F.1” section of the permit does not apply.

This permit will be re-drafted to reflect the changes to the NPDES permit.

**Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the “NPDES Permit Writer’s Manual” (362-0400-001), SOPs and/or BPJ.

**Outfall 401, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX	1/month	Estimate
CBOD <sub>5</sub>	XXX	XXX	XXX	25	XXX	50	1/month	Grab
TSS	XXX	XXX	XXX	30	XXX	60	1/month	Grab
Ammonia—N	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Fecal Coliform (No./100 ml) Oct 1 – Apr 30	XXX	XXX	XXX	2,000 Geo Mean	XXX	10,000	1/month	Grab
Fecal Coliform (No./100 ml) May 1 – Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1,000	1/month	Grab

Compliance Sampling Location: At discharge from the sewage treatment plant

Other Comments: None