



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Telephone Number: (304) 926-0495
Fax Number: (304) 926-0496

Earl Ray Tomblin, Governor
Randy C. Huffinan, Cabinet Secretary
dep.wv.gov

May 30, 2014

CERTIFICATION

**RE: WV/NPDES Permit Number WV0005339-C
Monongahela Power Co
Harrison County**

APPEAL NO.: 14-10-EQB

I, Scott G. Mandirola, Director, Division of Water and Waste Management, Department of Environmental Protection, in compliance with Chapter 22B, Article 1, Section 7(e), Code of West Virginia, as amended, do hereby certify that the enclosed is a true and accurate reproduction of the record of the proceedings out of which the appeal arises including documents and correspondence in the Director's file relating to the matter in question. Due to reproduction problems, maps have been omitted. These items are available for inspection at the Division of Water and Waste Management in Charleston.

DIVISION OF WATER AND WASTE MANAGEMENT

Scott G. Mandirola
Director

SGM:ld

Enclosures



West Virginia Environmental Quality Board

601 57th Street, S.E.
Charleston, West Virginia 25304

Phone: (304) 926-0445
Fax: (304) 926-0486
www.wveqb.org

MEMORANDUM

DATE: May 15, 2014

TO: Scott Mandirola, Director
Division of Water and Waste Management
Department of Environmental Protection

FROM: Jackie D. Shultz, Clerk *JDS*
Environmental Quality Board

RE: *Request for Certified File - Appeal No. 14-10-EQB*

Attached is Appeal No. 14-10-EQB, which was filed with the Environmental Quality Board on May 9, 2014. Within fourteen (14) days after receipt of this appeal, you must prepare, certify and provide to the Environmental Quality Board a complete record of the proceedings out of which the appeal arises, including all documents and correspondence in the Director's file relating to the matter in question. The record must be presented in chronological order and each page must be consecutively numbered.

The Certified File in this matter is due on May 29, 2014.

Thank you for your attention to this matter.

WEST VIRGINIA ENVIRONMENTAL QUALITY BOARD
CHARLESTON, WEST VIRGINIA

MONONGAHELA POWER COMPANY,

Appellant,

v.

Appeal No. 14-10-EQB

SCOTT G. MANDIROLA, Director,
Division of Water and Waste Management
West Virginia Department of Environmental
Protection,

Appellee.



NOTICE OF APPEAL

Actions Complained Of: Appellant Monongahela Power Company ("MPC") respectfully represents that it is aggrieved by certain terms and conditions of WV/NPDES Permit Modification No. WV0005339-C (attached hereto and made a part hereof as Exhibit A, hereafter the "Modification"), issued on April 8, 2014 by Scott G. Mandirola, Director, Division of Water and Waste Management, West Virginia Department of Environmental Protection ("WVDEP"). The Permit Modification reflects the extensive efforts undertaken by MPC to reconfigure stormwater flows and install new stormwater collection and treatment systems at the Harrison Power Station in Haywood, Harrison County, West Virginia. MPC challenges the following terms and conditions of the Permit as unlawful, unwarranted or otherwise improper:

- (1) The imposition of numeric discharge limitations for iron and aluminum at Outlets 012 and 013, as set forth in Sections A.012 and A.013 of the Permit Modification, respectively.
- (2) The monitoring frequency for total dissolved solids ("TDS") and sulfate at Outlets 012 and 013, as set forth in Sections A.012 and A.013 of the Permit Modification, respectively.

(3) The establishment of benchmark values for total dissolved solids and sulfate in Condition C.13.c on page 50 of 56 of the Permit Modification.

(4) It is MPC's understanding that only those conditions in Section C that were specifically revised by the Permit Modification will supersede the corresponding provisions of WV/NPDES Permit No. WV0005339 as reissued on May 5, 2011, and therefore that MPC is not required to initiate a new appeal proceeding to preserve its ongoing challenges to the terms and conditions of Section C that are unrelated to the modification.¹ Out of an abundance of caution, however, MPC hereby incorporates by reference those sections of its Notice of Appeal dated June 17, 2011 that relate to provisions of Section C not specifically referenced in Paragraphs (3) and (4), above.

Relief Requested: MPC therefore prays that the West Virginia Environmental Quality Board (the "Board") review this matter pursuant to W. Va. Code § 22-11-21 and grant it the following relief:

- (1) Delete the discharge limitations for iron and aluminum at Outlets 012 and 013, and insert "Report Only" requirements with corresponding benchmark values.
- (2) Reduce the monitoring frequency for TDS and sulfate at Outlets 012 and 013 from 1/6 months to 1/year, in accordance with the agreement of the parties in Appeal Nos. 11-21-EQB and 11-22-EQB as reflected in the Joint Status Report filed on July 25, 2012 (the "Joint Status Report").
- (3) Delete the benchmark values for TDS and sulfate in Condition C.13.c of the Permit Modification, in accordance with the agreement of the parties in Appeal Nos. 11-21-EQB and 11-22-EQB as reflected in the Joint Status Report.

¹ See W. Va. Code R. § 47-10-9.1.a (stating that "[w]hen a permit is modified, only the conditions subject to modification are reopened. All other conditions of the permit shall remain in effect for the duration of the permit"); WVDEP Response to Comments at p.2 (concurring in MPC's interpretation).

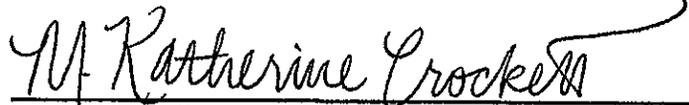
(4) Any other such revisions or relief deemed appropriate by the Board.

Specific Objections: MPC's specific objections, including questions of fact and law to be determined by the Board, are set forth in detail and attached hereto as Exhibit B.

Amendment of this Notice of Appeal may be had only by leave of the Board, and for good cause shown.

Respectfully submitted this 9th day of May, 2014.

MONONGAHELA POWER COMPANY



M. Ann Bradley (WV Bar #437)

M. Katherine Crockett (WV Bar #10799)

Spilman Thomas & Battle, PLLC

300 Kanawha Boulevard, East

Charleston, West Virginia 25301

Telephone: (304) 340-3800

Facsimile: (304) 340-3801

EXHIBIT B

FACTS RELEVANT TO APPEAL

The facts relevant to this appeal and the particular grounds on which this appeal is based, including questions of law and fact to be determined by the Board, are as follows:

1. On April 8, 2014, the West Virginia Department of Environmental Protection (“WVDEP”) issued WV/NPDES Permit Modification No. WV0005339-C (the “Permit Modification”) to Appellant Monongahela Power Company (“MPC”). The Permit Modification reflects significant efforts undertaken by MPC to reconfigure stormwater flows and install new stormwater treatment systems at the Harrison Power Station in Haywood, Harrison County, West Virginia. The Permit Modification modifies WV/NPDES Permit No. WV0005339, as issued by WVDEP on June 4, 2011 (the “2011 Permit”).
2. Although dated April 8, 2014, the Permit Modification was not received by MPC until April 11, 2014. Accordingly, this appeal has been timely filed within 30 days of receipt of the Permit Modification in accordance with W. Va. Code § 22-11-21.
3. With regard to item (1) under “Actions Complained Of” in the Notice of Appeal, MPC objects to the imposition of numeric discharge limitations for iron and aluminum at Outlets 012 and 013 of the Permit Modification, as set forth in Sections A.012 and A.013, respectively. In its response to comments, WVDEP indicates that effluent limitations for iron and aluminum were included for new Outlets 012 and 013 because corresponding limits had been imposed at Outlet 011 in the 2011 Permit. Response to Comments, p. 1. However, as set forth in the Notice of Appeal in the 2011 Permit, MPC objects to the agency’s determination that numeric discharge limitations are necessary or justified at the Harrison Power Station’s stormwater outfalls. Extensive work has been undertaken at the Station—during prior permit terms as well as during the current term—to reduce pollutant concentrations in the stormwater discharges from the site,

and the upgrades implemented through the instant Permit Modification constitute a **significant** component of these efforts. Accordingly, the agency's insistence upon the inclusion of **numeric discharge limits** is unwarranted and contravenes its own policy as set forth in the **letter** dated May 30, 2012 from Scott Mandirola, Director of the Division of Water and Waste Management, to the West Virginia Chamber of Commerce, West Virginia Manufacturers Association and the Utilities, Telecommunications and Energy Coalition (collectively, the "Associations"), a **copy** of which is attached hereto as Exhibit C. In that letter to the Associations, Director Mandirola represents that WVDEP's standard practice in permitting stormwater discharges from **industrial facilities** is to establish benchmark values and require **implementation and modification** of a stormwater pollution prevention plan ("SWPPP") designed to achieve these benchmarks. Only in "extreme cases where a permittee has not implemented an effective SWPPP" will the agency determine that "water quality-based effluent limits [should be included] on such stormwater discharges if they exhibit a reasonable potential to exceed water quality criteria." Attachment C at 2. Thus, the agency's practice is to impose numeric discharge limitations only as a **measure** of last resort when a facility has failed to demonstrate an effective SWPPP over an **extended period** of time. That is not the case here, particularly as Outlets 012 and 013 are new outfalls with no history of exceedances of the benchmark values. Indeed, WVDEP's immediate inclusion of numeric limits in the Permit Modification effectively denies the Station any **opportunity** to demonstrate achievement of the benchmark values and thereby avoid numeric limits.²

Furthermore, with respect to the discharge limitations for aluminum specifically, MPC objects to the agency's refusal to consider the implications of the pending site-wide aluminum translator study, which would directly impact these limits, if not eliminate them entirely based on

² This approach also precludes the Station from ever "waiving" the monitoring requirements for aluminum and iron at these outlets through the collection of four consecutive samples below the corresponding benchmark value in accordance with Condition C.13.c of the Permit.

a lack of reasonable potential to cause or contribute to a violation of water quality standards. In its Response to Comments, WVDEP states only that “[t]he pending modification for the aluminum translator has been placed on hold pending the resolution of Appeal No. 11-21-EQB since the Appeal directly impacts aluminum limitations.” Response to Comments, p. 2. While MPC understands the agency’s desire to effectuate the revisions necessitated by the translator study at the same time that the related issues raised in the 2011 appeal are resolved, a similar delay simply is not justified in the case of the two new outfalls designated by this Permit Modification. This is particularly the case where, as here, WVDEP has indicated that the agency has no substantive objections to the translator, and thereby essentially conceded that the discharge limitations being imposed are unduly stringent. Requiring a second, separate permit modification to implement the translator study for Outlets 012 and 013 is both unreasonable and an inefficient use of all parties’ resources.

For all of these reasons, WVDEP’s imposition of discharge limitations for iron and aluminum at Outlets 012 and 013 of the Permit Modification is improper, unreasonable and exceeds the agency’s authority under the West Virginia Water Pollution Control Act, W. Va. Code §§ 22-11-1 *et seq.*

4. With regard to items (2) and (3) under “Actions Complained Of” in the Notice of Appeal, MPC objects to (a) the monitoring frequency of 1/6 months for total dissolved solids (“TDS”) and sulfate at Outlets 012 and 013, and (b) the benchmark values for TDS and sulfate as set forth in Condition C.13.c of the Permit Modification, respectively. MPC notes that the parties have agreed to revisions of these terms in conjunction with the 2011 appeal, as set forth in the Joint Status Report submitted to the Environmental Quality Board on July 25, 2012. Accordingly, MPC has included these items in the instant Notice of Appeal to ensure that these

objections are preserved and to avoid concerns relating to the potential mooted of the original appeal issues by the issuance of the Permit Modification.

QUESTIONS OF FACT

1. What efforts have been undertaken by MPC to reduce concentrations of iron and aluminum present in stormwater discharges from the Harrison Power Station?
2. Does the aluminum translator previously completed for the Harrison Power Station and submitted to WVDEP apply to Outlets 012 and 013?
3. How were the benchmark values for TDS and sulfate set forth in Condition C.13.c. of the Permit derived?
4. What is the justification for the sampling frequency for TDS and sulfate at Outlets 012 and 013?
5. Any other question of fact that may arise during the course of the appeal process relating to the specific terms and conditions challenged in MPC's Notice of Appeal.

QUESTIONS OF LAW

1. Whether the imposition of numeric discharge limitations for iron and aluminum at Outlets 012 and 013 is unreasonable, improper or otherwise constitutes unlawful action by WVDEP?
2. Whether the monitoring frequency required for sampling of TDS and sulfate at Outlets 012 and 013 is unreasonable, improper or otherwise constitutes unlawful action by WVDEP?
3. Whether the adoption of benchmark values for TDS and sulfate at the Station's stormwater outfalls is unreasonable, improper or otherwise constitutes unlawful action by WVDEP?

**WEST VIRGINIA ENVIRONMENTAL QUALITY BOARD
CHARLESTON, WEST VIRGINIA**

MONONGAHELA POWER COMPANY,

Appellant,

v.

Appeal No. _____

**SCOTT G. MANDIROLA, Director,
Division of Water and Waste Management
West Virginia Department of Environmental
Protection,**

Appellee.

MOTION FOR STAY

Pursuant to W. Va. Code § 22B-1-7(d), Monongahela Power Company (“MPC”), by counsel, comes before the Environmental Quality Board (the “Board”) and moves for a **limited** stay of certain terms and conditions of WV/NPDES Permit Modification No. WV0005339-C (the “Permit Modification”), issued to MPC on April 8, 2014 by Scott G. Mandirola, **Director**, Division of Water and Waste Management, West Virginia Department of Environmental Protection (“WVDEP”). *See* Exhibit A attached to Notice of Appeal, and incorporated by reference herein. Specifically, MPC moves for a stay of the maximum daily discharge limitations for iron and aluminum at Outlets 012 and 013 in Sections A.012 and A.013 of the Permit Modification, respectively, pending MPC’s appeal of the legality of these conditions. In support of this Motion, MPC states as follows:

1. MPC has timely appealed certain terms and conditions of the Permit, **which** was received by MPC on April 11, 2014, and has timely filed this Motion for Stay concurrently with its Notice of Appeal.

2. In its Notice of Appeal of the Permit, MPC has objected to the **imposition** of numeric discharge limitations for iron and aluminum at Outlets 012 and 013, the **two** new

stormwater outfalls established by the Permit Modification. MPC contends that the imposition of numeric effluent limitations, rather than "report only" requirements and corresponding benchmark values, for these newly designated outlets is unwarranted and in contravention of stated agency policy relating to stormwater permitting. Moreover, with respect to the aluminum limits specifically, MPC objects to WVDEP's failure to consider the pending site-wide metals translator for the Harrison Power Station, which directly impacts (and would provide relief from) the limitations for aluminum at these outfalls.

3. Pursuant to W. Va. Code § 22B-1-7(d), if the Board determines that "an unjust hardship to the appellant will result from the execution or implementation of [the appealed agency action], [it] may grant a stay or suspension of the . . . permit . . . , and fix its terms." MPC believes that the simplicity of this standard recognizes the inherent unfairness of forcing a permittee to risk permit noncompliance and/or make significant expenditures in order to comply with newly imposed requirements before, at a minimum, it has an opportunity to challenge and be heard on the legality of those conditions.

4. The issue of the propriety of establishing numeric discharge limitations for outfalls discharging only stormwater is not a new one, and is fundamentally related to the pending appeal of similar water quality-based effluent limitations imposed at the remaining stormwater outfalls (Outlets 006, 007, 008, 009, 010 and 011¹) through the 2011 reissuance of WV/NPDES Permit No. WV0005339. As noted above, Outlets 012 and 013 are new outfalls for which new stormwater collection and treatment systems have been constructed, and therefore the

¹ All monitoring requirements for Outlet 011 have been removed through the issuance of the Permit Modification, due to the reconfiguration of stormwater flows at the Station and certification of the forested upland stormwater area draining to Outlet 011 as No Exposure Certification. WVDEP justifies the imposition of the new discharge limitations at Outlets 012 and 013 on the ground that similar limits previously had been imposed at Outlet 011 in the 2011 reissuance. MPC notes, however, that in the 2011 reissuance these limits were not immediately effective, but rather were subject to a two-year compliance schedule to allow the Station time to make any necessary adjustments to achieve compliance. A similar compliance schedule is not included in the Permit Modification for Outlets 012 and 013.

Station has limited experience relating to the concentrations of iron and aluminum anticipated to be present in these discharges. Because the numeric discharge limitations are immediately effective, absent a stay the Station will be vulnerable to potential violations of the same while its appeal of the legality of these conditions is ongoing. Because the Board agreed to a stay of these limits at the remainder of the Station's existing stormwater outlets following a stay hearing held in conjunction with the 2011 appeal, and given the alignment of the appeal issues, MPC maintains that a corresponding stay is warranted here.² Finally, with regard to the pending aluminum translator, WVDEP has indicated that it has no substantive objections to the study or its results, but nevertheless has determined to withhold its application as to new Outlets 012 and 013 only because the appeal of the 2011 reissuance is ongoing. As WVDEP essentially concedes that the limits that have been imposed by the Permit Modification for aluminum at Outlets 012 and 013 are unnecessarily stringent, it would be manifestly unfair to expose the Station to potential violations of these limits as a result of the agency's delay.

5. It is MPC's position that granting this Motion will not jeopardize water quality or the environment. If the requested stay of the discharge limitations is granted, MPC would continue to monitor and report to WVDEP the results for iron and aluminum at Outlets 012 and 013 as required by the Permit Modification.

WHEREFORE, MPC prays that the Board grant a stay of the terms and conditions of the Permit as set forth below:

1. That the new maximum daily discharge limitations for iron and aluminum at Outlets 012 and 013 be stayed pending the Board's final decision in this appeal.

² Indeed, MPC anticipates filing a Motion to Consolidate the appeal of the Permit Modification with Appeal Nos. 11-21-EQB and 11-22-EQB in an effort to resolve all of these objections in a coordinated, comprehensive manner. An evidentiary hearing is scheduled for Appeal Nos. 11-21-EQB and 11-22-EQB on September 11, 2014.

Respectfully submitted this 9th day of May, 2014.

MONONGAHELA POWER COMPANY

M. Katherine Crockett

M. Ann Bradley (WV Bar #437)

M. Katherine Crockett (WV Bar #10799)

Spilman Thomas & Battle, PLLC

300 Kanawha Boulevard, East

Charleston, West Virginia 25301

Telephone: (304) 340-3800

Facsimile: (304) 340-3801

WEST VIRGINIA ENVIRONMENTAL QUALITY BOARD
CHARLESTON, WEST VIRGINIA

MONONGAHELA POWER COMPANY,

Appellant,

v.

Appeal No. _____

SCOTT G. MANDIROLA, Director,
Division of Water and Waste Management
West Virginia Department of Environmental
Protection,

Appellee.

CERTIFICATE OF SERVICE

I, M. Katherine Crockett, counsel for Monongahela Power Company, do hereby certify that I have filed an original and six (6) copies of the foregoing Notice of Appeal and Motion for Stay with the Environmental Quality Board and have served true and exact copies of the same upon the Appellee, Scott G. Mandirola, Director of the Division of Water and Waste Management, West Virginia Department of Environmental Protection, by hand delivery, on this 9th day of May, 2014, addressed as follows:

Scott G. Mandirola, Director
Division of Water and Waste Management
West Virginia Department of Environmental Protection
c/o Jonathan C. Frame, Office of Legal Services
601 57th Street, S.E.
Charleston, WV 25304

MONONGAHELA POWER COMPANY



M. Ann Bradley (WV Bar #437)
M. Katherine Crockett (WV Bar #10799)
Spilman Thomas & Battle, PLLC
300 Kanawha Boulevard, East
Charleston, West Virginia 25301
Telephone: (304) 340-3800
Facsimile: (304) 340-3801

January 30, 2013

Division of Water and Waste Management
West Virginia Department of Environmental Protection
601 57th Street
Charlestown, West Virginia 25304

Dear Sir or Madam:

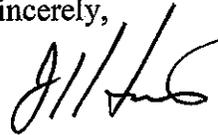
RE: Major Permit Modification for Harrison Power Station
NPDES Permit No. WV0005339

In accordance with Order 7004, FirstEnergy Corp. is seeking a major permit modification for the Harrison Power Station's Outlet 011 watershed. The station is updating the Storm Water Pollution Prevention Plan which includes proposing the relocation of current Storm Water Outlet 011 and adding the associated discharges from newly constructed Storm Water Outlet 011A.

Please find enclosed a completed WVDEP Application for Water Pollution Control Permit Modification Form M, the associated application fee of \$1,500, an application addendum, and project details for the changes desired under the above referenced permit.

Should you have any questions, please contact Joe Lapcevic by phone at (724) 838-6099 or by email at jlapcev@firstenergycorp.com

Sincerely,



Justin D. Harris
Associate Scientist
Environmental Department

Enclosures
By UPS Next Day Air

WEST VIRGINIA DIVISION OF ENVIRONMENTAL PROTECTION
Division of Water and Waste Management
Application For WV/NPDES Water Pollution Control Permit Modification

Revised 1/10

Please print or type in the unshaded area only.

I. PERMITTEE'S NAME NAME OF FACILITY

MONONGAHELA POWER COMPANY HARRISON POWER STATION

II. FACILITY CONTACT

A. Name and Title (last, first and title) B. Phone (area code & number)
GRAF, JAMES E. - DIRECTOR (304) 584 - 2233

III. FACILITY MAILING ADDRESS

A. Street or Post Office Box
PO BOX 600
B. City or Town HAYWOOD C. State WV D. Zip Code 26366

IV. FACILITY LOCATION

A. Street, Route No. Or other specific identifier
WV STATE ROUTE 20
B. City, Town or nearest Post Office HAYWOOD C. County HARRISON D. Zip Code 26366

V. MODIFICATION OF EXISTING PERMIT

A. The applicant must present a detailed description with supporting drawings, water analyses, etc. as to exactly what modification is being applied for. A schedule of compliance (completion of final plans, commencement and completion of construction, operational level date, etc.), beginning at the time of permit modification issuance must also be provided where applicable.

B. Description of proposed modification

* PLEASE SEE ADDENDUM AND ATTACHED PROJECT DESCRIPTION

VI. CERTIFICATION (see instructions)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. NAME AND OFFICIAL TITLE (type or print) B. SIGNATURE C. DATE SIGNED
D. Applicant's Email Address JGRAF@FIRSTENERGYCORP.COM Consultant/Preparer E-Mail Address JDHARRIS@FIRSTENERGYCORP.COM

We will process your personal information (email address, mailing address and/or telephone number) in accordance with the State of West Virginia's Privacy Policy for appropriate and customary business purposes. Your personal information may be disclosed to other State agencies or third parties in the normal course of business or as needed to comply with statutory or regulatory requirements, including Freedom of Information Act requests. The Division of Water and Waste Management will appropriately secure your personal information. If you have any questions about our use of your personal information, please contact the DEP's Chief Privacy officer at depprivacyofficer@wv.gov.

West Virginia Department of Environmental Protection
Division of Water & Waste Management
Application for NPDES Water Pollution Control Permit Modification

FORM M – Addendum

V. Modification of Existing Permit

In accordance with Order 7004, FirstEnergy Corp., with assistance from URS Corporation, has developed a Corrective Action Plan for Harrison Power Station's storm water Outlet 011. This Plan involves updates to the Storm Water Pollution Prevention Plan (SWP3) which include the construction of sediment retention basins to achieve established storm water benchmarking values. Harrison Power Station is seeking a major permit modification for the relocation of current storm water Outlet 011 and for the associated discharge of newly constructed storm water Outlet 011A.

Based on URS Corporation's evaluation of the approximately 80 total acre Outlet 011 watershed on January 16, 2012, it was determined that industrial activity areas could feasibly be segregated out. To accomplish this segregation, the Outlet 011 watershed will be divided into three control areas: newly constructed sediment basins with proposed movement of the monitoring point for Outlet 011 (32 acres), newly constructed sediment basin with proposed Outlet 011A (3 acres), and a "No Exposure Certification" area (45 acres), which will discharge from the current Outlet 011 monitoring point. A summary of this Outlet segregation is as follows:

- Multiple areas of industrial activity encompassing roughly 35 acres of drainage area were identified during the site walk down evaluation (two contractor lay down areas, the Microwave Building lot, miscellaneous roadways, the contractor/station parking lot drains and the northern section of the switchyard drainage area rerouted from Outlet 007 drainage area). The remaining 45 acres of Outlet 011's original drainage were identified as "No Exposure Certification" (NEC) areas.
- Segregation of the industrial activities from the NEC areas is necessary to minimize the structural best management practice (BMP) size to a reasonable magnitude.
- FirstEnergy proposes that the 45 acres of Outlet 011 forested upland stormwater area be exempted from NPDES permitting via the NEC, and segregated from stormwater associated with industrial activity so that it can be removed from the NPDES permit. This water would continue to discharge to the West Fork River in the existing concrete culvert, but it will be removed from the permit and will not require monitoring.

- The Microwave lot, former Outlet 007 drains, and the contractor's southern lay down area currently discharge to a common point located in the grass lawn located south of the No. 1 Cooling Tower. This area is the location of the new Outlet 011 industrial activity area structural BMP placement and is detailed on URS Drawing C0100.
- The 2.6 acres of the contractor's northern lot runoff currently discharges overland downstream of proposed Outlet 011. Roughly 2.0 acres of this area will be readily diverted into the existing roadway ditch (with the southern lot water) to proposed Outlet 011 by rehabilitating a trench on the western reach of the northern lot. The 0.6 acres of area leading to and surrounding the warehouse located in the eastern corner of the northern lot would be collected by a shallow trench to a catch basin and conveyed 500 feet connecting to the proposed 011A storm sewer system.
- An additional 12 acres of storm water runoff from above the contractor lay down areas which currently discharge to the control point will be diverted away by improving approximately 150' of earthen trench southwest of the southern lot; diverting the existing storm water sewer pipe from the southern lot diversion trench approximately 600' downstream of the control point; and diverting the NEC water trench from above the northern lot, 300' through the lot to the hillside downstream of the control point.
- Storm water from the roadway that travels past the Auger House, then turns east along the roadway adjacent to the coal pile, and then travels south along the roadway heading towards the waste water lagoon No. 2 will be drained into a new 12-inch sewer line, joined by the drainage from the 0.6 acres around the warehouse noted above, and enter the newly constructed sediment basin, finally discharging at proposed Outlet 011A.

The newly established structural and nonstructural controls for the Outlets are described below.

- Improvements at the new monitoring point for Outlet 011 consist of the following elements:
 - Construction of Two New Sediment Basins: The sediment basins are located just south of the helicopter pad between two existing paved drives. The first sediment basin (West) is approximately 96 feet long, 45 feet wide. The second basin (East) is approximately 113 feet long, 39 feet wide. Both basins are constructed with a concrete base, fabriform side walls, earthen bank materials, and an emergency overflow spillway. The two basins are connected with a 36-inch pipe with the west basin draining into the east. The new outlet structure (proposed movement of the Outlet 011 monitoring point) is constructed at the northeast end of the basin and is a vertical 72-inch by 72-inch reinforced concrete box structure discharging via a 48-inch diameter HDPE pipe into the NEC water trench, which carries NEC water to the old Outlet 011 sample point. Settled solids will periodically be removed from these basins.
 - Construction of New Storm Sewers: New storm sewer lines are located to the south and west of the West basin, as well as connecting the two new basins via headwall structures. These 12-inch to 24-inch storm sewer lines run approximately 2,400 linear feet total and also include the installation of associated catch basins, manholes, and headwalls. Storm water inverts vary from approximately 4 to 13 feet in depth, relative to existing grades along the sewer alignments.
 - Ditch Improvements: Existing ditches were widened to have a cross-section trapezoidal configuration with side slopes of 3H:1V. Ditch lines and inverts match existing elevations and locations. Approximately 1,350 linear feet of ditches were improved.
 - Approximately 12 acres of non-industrial wastewater from above the contractor lay down areas which currently discharge to the control point will be diverted away by improving approximately 150' of earthen trench southwest of the southern lot; diverting the existing sewer pipe from the southern lot diversion trench approximately 600' downstream of the control point; and diverting the NEC water trench from above the northern lot, 300' through the lot to the hillside downstream of the control point.

- The 2.3 acre Employee Parking Lot (formerly thought to discharge to Outlet 007) actually drains through an approximately 30-inch RCP in a sewer that runs through the proposed Outlet 011 sedimentation basin. This storm sewer is now intercepted, collected, and gravity-fed into the East sediment basin.
- Improvements at proposed Outlet 011A consist of the following elements:
 - Construction of a New Sediment Basin: The new sediment basin is located south of the two waste water lagoons, near the exit of existing Outlet 011. The basin is approximately 65 feet long, 65 feet wide with a concrete base, fabricform side walls, earthen bank material, and an emergency overflow spillway. A new outlet control structure was constructed at the southeast end of the basin, and is a vertical 48-inch by 48-inch reinforced concrete box structure discharging to the West Fork River. Settled solids will be removed from the basin periodically.
 - Construction of New Storm Sewers: New storm sewer lines are located to the north and west of the proposed Outlet 011A basin. These new 8-inch, 12-inch, and 15-inch pipes cover approximately 2,200 linear feet and also include the installation of associated catch basins, manholes, and headwalls. Storm water inverts vary from approximately 4 to 13 feet in depth, relative to existing grades along the sewer alignments.
 - Installation of new Storm Sewers to connect drainage from the 0.6 acre contractor lot around the warehouse to the 011A Storm Sewer system by gravity flow.
 - Ditch Reconfiguration: The existing 60-inch pipe has been removed and replaced with a new ditch, which as a cross-section trapezoidal configuration with side slopes of 3H:1V. This ditch line and inverts match existing elevations and locations. The length of this ditch is approximately 300 linear feet.



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Telephone Number: (304) 926-0495
Fax Number: (304) 926-0496

Earl Ray Tomblin, **Governor**
Randy C. Huffman, **Cabinet Secretary**
dep.wv.gov

February 1, 2013

James E. Graf, Director
Monongahela Power Co
PO Box 600
Haywood, WV 26366

RE: WV/NPDES Permit Modification
WV0005339-C, Harrison County

Dear Sir or Madam:

We are in receipt of your application for a Permit Modification under a WV/NPDES Permit. Upon review, this agency has determined that your application is not **administratively** complete. Please submit the requested information as soon as possible so that we may **begin** our technical review of your application.

The items marked below must be submitted:

- () \$000.00 an additional application fee by check or money order made payable to **WV** Department of Environmental Protection
- () Wasteload Allocation (form enclosed)
- (X) Notarized Class I Statement for Billing (form enclosed must be notarized).
- () Industrial User Form (form enclosed).
- () Modification form (application enclosed).
- () Groundwater Protection Plan (GPP) as required by Title 47, Series 58, Section 4.11 of the Legislative Rules. For any questions regarding the GPP, please contact our Groundwater Office at 926-0495.
- () Sewage Sludge forms (forms enclosed).

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- () Signature and date required on application (signature page enclosed). Please refer to enclosed document pertaining to signature.

If you have any questions, please contact Renee Clevenger of this office at (304) 926-0499 Ext. 1069.

Sincerely,



Lori Devereux
NPDES Team

LD

cc: Env. Insp. Supv.
Env. Insp.

RECEIVED FEB 08 2013



Allegheny Energy

800 Cabln Hill Drive
Greensburg, PA 15601

CERTIFIED MAIL

91 7199 9991 7031 8130 1453

February 6, 2013

Attn: Lori Devereux - NPDES Team
Division of Water and Waste Management
WV Department of Environmental Protection
601 - 57th Street
Charleston, WV 25304

RE: Harrison Power Station
Harrison County, Haywood, WV
NPDES Permit WV0005339 Modification
Notarized Class I Statement for Billing

Dear Ms. Devereux:

In response to your February 1, 2013 letter, enclosed please find a completed, signed, and **notarized** Class I Statement for Billing. Please note: although Monongahela Power Company (MonPower) holds a minority interest in Harrison Power Station (Harrison), Allegheny Energy Supply Company, LLC (AE Supply) holds the majority interest and is listed on Harrison's current NPDES permit (WV0005339) as the owner. Both AE Supply and MonPower are subsidiaries of Allegheny Energy Inc., which is a subsidiary of FirstEnergy Corp. Currently, we are seeking the Public Service Commission's approval to transfer AE Supply's ownership over to MonPower.

Should you have any further questions regarding this permit modification application, please contact me directly at (724) 838-6099.

Sincerely,

Joseph P. Lapcevic
Senior Scientist

Enclosure

c: Renee Clevenger - WVDEP
J. E. Graf - WV-HRPS



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Telephone Number: (304) 926-0495
Fax Number: (304) 926-0496

Earl Ray Tomblin, **Governor**
Randy C. Huffman, **Cabinet Secretary**
dep.wv.gov

February 8, 2013

James E. Graf, Director
Allegheny Energy Supply Co
PO Box 600
Haywood, WV 26366

RE: WV/NPDES Permit Modification
WV0005339-C, Harrison County

Dear Mr. Graf:

Your forms for a Permit Modification were received by this agency on February 8, 2013 and have been determined to be administratively complete. Upon conclusion of this agency's review for the application's technical completeness, you will be so notified. During this review you may be contacted for corrections, deletions, or additions to the application. Your cooperation will expedite our review and assure completeness of your application.

For your information the completeness review period, as set forth in Title 47, Series 10, Section 4.2.c of the West Virginia Legislative Rules, commenced February 8, 2013.

You have applied for an individual permit modification. The average processing time for application of this type is 180 days.

Your application will be handled and reviewed by our NPDES Permit and Permit Support Teams. If you have questions, please do not hesitate to contact John Lockhart of this office at (304) 926-0499 Ext. 1028.

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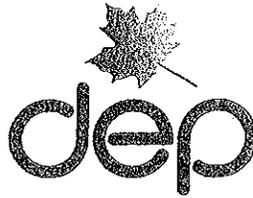
You may also check on the status of your application, or obtain additional contact information, via the internet by visiting Permitting, Division of Water and Waste Management at www.dep.wv.gov.

Sincerely,



Lori Devereux
NPDES Team

cc: Env. Insp. Supv
Env. Insp



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Telephone Number: (304) 926-0495
Fax Number: (304) 926-0496

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

September 4, 2013

James E. Graf, Director
Allegheny Energy Supply Co
Harrison Power Station
PO Box 600
Haywood, WV 26366

91 7199 9991 7030 8753 7086

RE: WV/NPDES Permit Application
No. WV0005339-C-Harrison County

Dear Sir or Madam:

Your forms for Permit Modification Application No. WV0005339 for WV/NPDES Water Pollution Control Permit Modification have been found to be complete.

For your information, the public notice period prescribed in Title 47, Series 10, Section 12.1.b of the West Virginia Legislative Rules issued pursuant to Chapter 22, Article 11 commences on the 6th day of September, 2013 in Exponent Telegram.

Within twenty (20) days after publication of the public notice, you are required to send to the Office a certificate of publication. This should be sent to:

Director, Division of Water and Waste Management, DEP
Permitting Section
601 57th Street, SE
Charleston, WV 25304-2345
Attention: Lori Devereux

Enclosed are copies of your draft permit, any required fact sheet and the public notice. If you have any questions, please do not hesitate to contact this office at 304-926-0495.

Sincerely,

Lori Devereux
NPDES Team

Enclosures

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**STATE OF WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER AND WASTE MANAGEMENT**

PUBLIC NOTICE

WEST VIRGINIA DEPARTMENT OF ENVIRONMENTAL PROTECTION'S, PUBLIC INFORMATION OFFICE, 601 57TH STREET SE, CHARLESTON, WEST VIRGINIA 25304-2345 TELEPHONE: (304) 926-0440.

APPLICATION FOR A WEST VIRGINIA NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM WATER POLLUTION CONTROL PERMIT MODIFICATION

Public Notice No.: L-93-13

Public Notice Date: September 06, 2013

Paper: *Exponent Telegram*

The following has applied for a WV NPDES Water Pollution Control Permit Modification for this facility or activity:

Appl. No.: WV0005339

Applicant: ALLEGHENY ENERGY SUPPLY COMPANY, LLC
800 CABIN HILL DR
GREENSBURG, PA 15601

Location: HAYWOOD, HARRISON COUNTY

Latitude: 39:23:04

Longitude: 80:19:55

Receiving Stream:
WEST FORK RIVER

Activity:

To acquire, construct, install, operate, and maintain improvements to the facility's stormwater runoff collection, treatment, and discharge facilities. Treated storm water will be discharged through Outlet 012 and Outlet 013 into the West Fork River. Also, to discharge untreated non-industrial storm water runoff through Outlets 011 and 014 into the West Fork River. Tier 1 protection is afforded for the uses specified in 47 CSR 2, Section 6.

Business conducted:

Production and distribution of electric power.

Implementation:

N/A.

On the basis of review of the application, the "Water Pollution Control Act (Chapter 22, Article 11-8(a))," and the "West Virginia Legislative Rules," the State of West Virginia will act on the above application.

Any interested person may submit written comments on the draft permit modification and may request a public hearing by addressing such to the Director of the Division of Water and Waste Management within 30 days of the date of the public notice. Such comments or requests should be addressed to:

Director, Division of Water and Waste Management, DEP
ATTN: Debbie McCann, Permitting Section
601 57th Street SE
Charleston, WV 25304-2345

The public comment period begins September 06, 2013 and ends October 06, 2013.

Comments received within this period will be considered prior to acting on the permit modification application. Correspondence should include the name, address and the telephone number of the writer and a concise statement of the nature of the issues raised. The Director shall hold a public hearing whenever a **finding** is made, on the basis of requests, that there is a significant degree of public interest on issues relevant to the **Draft Permit Modification(s)**. Interested persons may contact the public information office to obtain further information.

The application, draft permit modification and any required fact sheet may be inspected, by **appointment**, at the Division of Water and Waste Management Public Information Office, at 601 57th Street SE, Charleston, WV, between 8:00 a.m. and 4:00 p.m. on business days. Copies of the documents may be obtained from the **Division** at a nominal cost. Calls must be made 8:30 a.m. to 4:30 p.m. Monday through Friday.



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0495
Fax: (304) 926-0463

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

-DRAFT-

Mr. James E. Graf, Director
Allegheny Energy Supply Co.
Harrison Power Station
P.O. Box 600
Haywood, WV 26366

CERTIFIED RETURN RECEIPT REQUESTED

Re: WV/NPDES Permit Modification
WV0005339-C, Harrison County

Dear Mr. Graf:

This correspondence shall serve as Modification No. 3 of your existing WV/NPDES Water Pollution Control Permit No. WV0005339 issued the 4th day of June 2011.

After review and consideration of the information accompanying WV/NPDES Water Pollution Control Permit No. WV0005339, and after consideration of the information submitted on, and with Permit Modification Application No. WV0005339-C, dated the 31st day of January 2013 and other relevant information, the subject Permit is hereby modified to incorporate the following:

1. The permittee may acquire, construct, install, operate and maintain upgrades to the facility's storm water collection, treatment, and disposal systems. The upgrades are generally described as follows and include:
 - a. Approximately 45 acres of existing Outlet 011 forested upland storm water area designated as No Exposure Certification (NEC) that will continue to discharge through the existing Outfall 011 structure. This area will be segregated from storm water associated with industrial activity, and monitoring requirements for existing Outlet 011 have been eliminated. Section C.26 has been added to the permit to address future potential changes to land uses within the area currently designated as NEC. Section A.011 is hereby deleted from the permit.

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- b. Construction of two (2) new sediment basins located just south of the helicopter pad between two existing paved drives. The two basins are constructed in series with a 36-inch diameter pipe with the west basin draining into the east. A new outlet structure with a 48-inch diameter discharge pipe will serve as new Outlet 012. New Outlet 012 will discharge into the NEC water trench for ultimate discharge through existing Outlet 011.
 - c. A new sediment basin has been constructed south of the two wastewater lagoons, near the discharge of existing Outlet 011. The new sediment basin discharges through new Outlet 013 (identified as proposed Outlet 011A in the modification application) to the West Fork River. New storm sewer lines located to the north and west of the proposed Outlet 013 sediment basin include approximately 2,200 linear feet of 8-inch, 12-inch, and 15-inch pipe, improved ditching and associated catch basin, manholes, and headwalls.
 - d. During a July 1, 2013 site visit by WVDEP at the facility, a storm water pipe was discovered discharging which was not previously included in the facilities NPDES permit. The pipe is located just north of the existing Outlet 011 and new Outlet 013 locations. The discharge from the pipe consists of non-industrial storm water runoff from the area just west of the existing wastewater treatment lagoon. This discharge is designated as new Outlet 014. No monitoring requirements are being imposed on the new outlet. Section C.26 has been added to the permit to address future potential changes to land uses within the area currently designated as NEC.
2. As a result of these revisions, Section A.012 and Section A.013 are being incorporated into the permit. Monitoring requirements and limitations are the same as what was previously imposed at Outlet 011. This has also resulted in revisions to storm water requirements in Section C.13 of the permit.
 3. Also, please note that Section C.17.c has been revised to be consistent with updated certification requirements.

Please find attached revised Page Nos. 41 and 42 of 56 which incorporates Section A.012, revised Page Nos. 43 and 44 of 56 which incorporates Section A.013, and revised Page Nos. 49 - 53 of 56 with revised Section C – Other Requirements, and new DMRs for Outlets 012 and Outlet 013. These documents shall supersede the ones currently in your possession and should be incorporated, as appropriate, into your existing WV/NPDES Water Pollution Control Permit.

This Modification in no way relieves the permittee of its obligation to comply with all terms and conditions of its WV/NPDES Permit No. WV0005339 and shall not constitute an affirmative defense in any enforcement action brought against the permittee.

Allegheny Energy Supply Co.
Harrison Power Station
Modification No. 1
Page 3 of 3

All other terms and conditions of the subject WV/NPDES Water Pollution Control Permit No. WV0001112 shall remain in effect and unchanged. Should you have any questions, please contact Mr. Ryan K. McGlothen, P.E. of this office at 304-926-0499 extension 1092.

Sincerely,

Scott G. Mandirola
Director

SGM:rkm

cc: EE Supervisor
EE Inspector
USEPA Region 3

A.012 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning Date of Modification and lasting through midnight 6/3/2015 the permittee is authorized to discharge from Outlet Number(s) 012 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> |
|--|------------------------------|-----|--------------|------------------------|--------------------------------|------------------------|--------------|------------------------------|--------------------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | | | | | |
| Flow, in Conduit or thru plant (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mgd | 1/quarter | Estimated |
| Total Suspended Solids (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/quarter | Grab |
| pH (Year Round) (ML-1) | N/A | N/A | N/A | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | S.U. | 1/6 months | Grab |
| Copper, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Zinc, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Mercury, Total (as Hg) (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | ug/l | 1/6 months | Grab |
| Aluminum, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | mg/l | 1/quarter | Grab |
| Iron, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | mg/l | 1/quarter | Grab |

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 012 - At the discharge from the two sediment ponds in series prior to discharge to the non-industrial stormwater runoff ditch to Outlet 011.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

A.012 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning Date of Modification and lasting through midnight 6/3/2015 the permittee is authorized to discharge from Outlet Number(s) 012 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | | | <u>Monitoring Requirements</u> | | |
|--|------------------------------|-----|--------------|--------------------|--------------------------|------------------------|--------------------------------|--------------------|------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | |
| Selenium, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Arsenic, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Solids, Total Dissolved (TDS) (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Sulfate (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Thallium, Total (as Tl) (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Chromium, Hex. Diss. (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |

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Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 012 - At the discharge from the two sediment ponds in series prior to discharge to the non-industrial stormwater runoff ditch to Outlet 011.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

A.013 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning Date of Modification and lasting through midnight 6/3/2015 the permittee is authorized to discharge from Outlet Number(s) 013 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | | | |
|--|------------------------------|-----|--------------|------------------------|--------------------------------|------------------------------|--------------------|------------|-----------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | | |
| Flow, in Conduit or thru plant (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mgd | 1/quarter | Estimated |
| Total Suspended Solids (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/quarter | Grab |
| pH (Year Round) (ML-1) | N/A | N/A | N/A | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | S.U. | 1/6 months | Grab |
| Copper, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Zinc, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Mercury, Total (as Hg) (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | ug/l | 1/6 months | Grab |
| Aluminum, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | mg/l | 1/quarter | Grab |
| Iron, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | mg/l | 1/quarter | Grab |

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 013 - At the discharge from the single sediment pond prior to discharge to the West Fork River via an open channel.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

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A.013 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning Date of Modification and lasting through midnight 6/3/2015 the permittee is authorized to discharge from Outlet Number(s) 013 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> |
|---|------------------------------|--------------|--------------------|--------------|--------------------------------|------------------------|--------------|------------------------------|--------------------|
| | <u>Quantity</u> | <u>Units</u> | <u>Other Units</u> | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | | | |
| Selenium, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Arsenic, Total Recoverable (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Solids, Total Dissolved (TDS) (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Sulfate (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Thallium, Total (as Tl) (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| Chromium, Hex. Diss. (Year Round) (ML-1) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |

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Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 013 - At the discharge from the single sediment pond prior to discharge to the West Fork River via an open channel.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

Section C - Other Requirements

01. The permittee shall practice good housekeeping including maintaining the facility grounds. There shall be **no** scattered parts, equipment, debris, etc. Any and all drums shall be either stored in a covered area or kept **upon** pallets and properly sealed.
02. The issuance of this permit shall not relieve the permittee of the obligation to comply with any other federal, state or local laws. Compliance with this permit does not relieve the permittee from the obligation of Section 311 of the Clean Water Act. This permit does not authorize spills of hazardous substances/wastes from any permitted **outlet** into waters of the State. Such incidents are to be reported in accordance with Sections IV.1 and IV.2 of **Appendix A** of this permit.
03. Upon review of information submitted under terms and conditions of this permit, the permit may be **modified** to require additional effluent limitations/monitoring requirements and/or improved best management practices.
04. The permittee shall notify the Division of Water and Waste Management immediately when it becomes **aware** of any migration of any pollutant from any unpermitted source (such as contaminated groundwater and/or **storm** water) into surface waters of the State.
05. Without prior approval from the agency, the permittee shall not accept and treat wastewater from any other **facility**.
06. The permittee shall submit each month according to the enclosed format, a Discharge Monitoring Report (**DMR**) indicating in terms of concentration and/or quantities the values of the constituents listed in Section A **analytically** determined to be in the plant effluent(s). Additional information pertaining to effluent monitoring and **reporting** can be found in Section III of Appendix A.
07. The required DMRs shall be received by the agency no later than 20 days following the end of the reporting period in accordance with the following requirements. The agency encourages the permittee to utilize our **electronic** discharge monitoring report (eDMR) system. If the permittee uses the eDMR system, the permittee is not **required** to submit hard copies of the DMRs to the addresses listed below. However, if the permittee elects to not **use** the eDMR system, then the permittee is required to send hard copies to the addresses below. The permittee **may** contact the agency for more information about the eDMR system. Regardless, in accordance with **Appendix A**, Section III.6 of this permit, the permittee shall maintain copies of DMRs (either hard copies or **electronic copies**) at the plant site and the DMRs shall be made readily available upon request from DEP personnel.
 - a.

| | |
|---|--|
| Director Division of Water and Waste Management 601 57th Street, SE Charleston, West Virginia 25304 Attn: Permitting Branch | U. S. Environmental Protection Agency Region III, Water Protection Division NPDES Enforcement Branch (3WP42) 1650 Arch Street Philadelphia, PA 19103 |
|---|--|
08. The permittee shall not use alternate DMRs without prior approval from this Agency.
09. Any "not detected (ND)" results by the permittee must be "ND" at the method detection limit (MDL) for **the** test method used for that parameter and must be reported as less than the MDL used. The permittee may not **report** the result as zero, "ND", or report the result as less than a minimum level (ML), reporting limit (RL), or **practical** quantitation limit (PQL).

When averaging values of analytical results for DMR reporting purposes for monthly averages, the permittee should use actual analytical results when these results are greater than or equal to the MDL and should use zero (0) when these results are less than the MDL. If all analytical results are non-detect at the MDL (<MDL), then the permittee should use the actual MDL in the calculation for averaging and report the result as less than the average **calculation**.

Section C - Other Requirements

10. In incidences where a specific test method is not defined, the permittee shall utilize an EPA approved method with a method detection limit (MDL) sensitive enough to confirm compliance with the permit effluent limit for that parameter. If a MDL is not sensitive enough to confirm compliance, the most sensitive approved method must be used. If a more sensitive EPA approved method becomes available, that method shall be used. Should the current and/or new method not be sensitive enough to confirm compliance with the permitted effluent limit, analytical results reported as "not detected" at the MDL of the most sensitive method available will be deemed compliant for purposes of permit compliance. Results shall be reported on the Discharge Monitoring Reports as a numeric value less than the MDL.
11. The Groundwater Protection Plan (GPP) shall be maintained at the plant site and shall be available for inspection by the Division of Water and Waste Management personnel.
12. The permittee shall maintain and implement the storm water pollution prevention plan (SWPPP) for the site. The SWPPP shall be prepared in accordance with good engineering practices. The SWPPP shall identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges associated with the industrial activity. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with the industrial activity at the facility and to assure compliance with the terms and conditions of this permit. A copy of this document shall be retained at the site for review upon request.
13. The following storm water requirements apply to Outlet(s) 006, 007, 008, 009, 010, 012, and 013:

- a. Samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. Samples shall be taken during the first thirty (30) minutes, or as soon thereafter as practicable, of the storm event.
- b. Each outlet shall be monitored separately.

| Pollutant | Benchmark Value |
|------------------------|-----------------|
| Total Suspended Solids | 100 mg/l |
| pH | 6.0 to 9.0 S.U. |
| Total Copper | 0.0636 mg/l |
| Total Zinc | 0.117 mg/l |
| Total Aluminum | 0.75 mg/l |
| Total Selenium | 0.005 mg/l |
| Total Iron | 1.0 mg/l |
| Total Arsenic | 0.16854 mg/l |
| Total Mercury | 0.0014 mg/l |
| Total Thallium | 0.14 mg/l |
| Hexavalent Chromium | 0.016 mg/l |
| Total Dissolved Solids | 735 mg/l |
| Sulfate | 500 mg/l |

When the concentration results from a minimum of four consecutive samples of a pollutant are all less than the corresponding benchmark value for the pollutant, additional monitoring for the pollutant is not required (all pH values of the samples must be within the range 6.0 to 9.0 S.U.). The facility shall submit, each year, to the Division of Water and Waste Management, in lieu of the monitoring data, a certification (form will be provided upon request) that there has not been a significant change in the industrial activity or the pollution prevention measures in the area of the facility that drains to the outlet for which sampling is to be waived. If the concentration of a pollutant exceeds the corresponding benchmark concentration or a pH value is not within the range of 6.0 to 9.0 S.U., monitoring shall be continued and storm water pollution prevention practices shall be revised and implemented. A letter stating the revised and implemented storm water pollution prevention practices shall be submitted to the Division of Water and Waste Management at the address listed in Section C.07. These requirements do not apply to pollutants with effluent limitations.

14. If there is evidence indicating potential or realized impacts on water quality due to any storm water discharge associated with industrial activity covered by this permit, the permit may be promptly modified and/or reissued to include effluent limitations and/or other requirements to control such storm water discharges.
15. The permittee shall perform quarterly chronic toxicity tests as described below, on the effluent from Outlet 001 & 002:

Section C - Other Requirements

15. a. Such testing will determine if an appropriate dilute effluent sample affects the survival or reproduction of the test species. A 24-hr flow weighted composite samples of the effluent, as prescribed in Section A, shall be collected for testing. An appropriate statistical test shall be used to determine whether differences in control and effluent data are significant.
- i) The permittee shall conduct a three brood (6-8 days) Ceriodaphnia Dubia survival and reproduction toxicity test on the final effluent diluted by appropriate control water. Toxicity will be demonstrated if there is a statistically significant difference at the 95 percent confident level in survival of reproduction between Ceriodaphnia Dubia exposed to an appropriate control water and the final effluent. All test solutions shall be renewed using an approved renewal schedule. If, in any control, more than 20% of the test organisms die, or less than 60% of surviving females in controls produced their third brood, that test shall be repeated.
 - ii) The permittee shall conduct a 7-day Pimephales Promelas fathead minnow larval survival and growth toxicity test on the final effluent diluted by appropriate control water. Toxicity will be demonstrated if there is a statistically significant difference at the 95 percent confidence level in survival or growth between fathead minnows exposed to an appropriate control water and the final effluent. All test solutions shall be renewed using an approved renewal schedule. If, in any control, more than 20% of the test organisms die, or average dry weight of surviving controls was less than 0.25 mg/l that test shall be repeated.
- b. Results shall be reported in terms of chronic toxic units (TUc) and shall be submitted with the corresponding monthly Discharge Monitoring Report (DMR).

$TUc = 100/NOEC$ or NOEL

Where NOEC (or NOEL) is No Observed Effect Concentration (or Level), which is expressed as percent (volume) effluent in dilution water.

For Example, if NOEC is 10%, $TUc = 100/10 = 10$

When the effluent demonstrates no toxicity at 100% effluent (no observed effect), the permittee may report zero TUc.

- c. The monitoring required, herein, shall be conducted in accordance with the sample collection, preservation, and analytical procedures specified in 40 CFR 136.
- d. In addition to the monitoring data reporting requirements of 40 CFR 136, the exact age of the test organisms at the initiation of the test shall be reported. Values of less than or equal to 24 hours are acceptable for Pimephales Promelas, fathead minnow. The range of the Ceriodaphnia Dubia used must be reported as a range in hours. All Ceriodaphnia Dubia used in the test must be less than 24 hours of age at test commencement. The age difference between the youngest and oldest Ceriodaphnia Dubia used in the test must not exceed eight (8) hours.
- e. The chronic toxicity testing shall be performed on a quarterly basis. There shall be a minimum of one (1) month between sampling events.
- f. If chronic effluent toxicity testing results in a value exceeding 1.9 TUc at Outlet or 1.66 TUc at Outlet 002, the permittee shall immediately resample and test the effluent. This shall be performed within 30 days of the initial demonstration of the aforementioned exceedance. Copies of the retesting results shall be provided to the Director immediately upon completion of the test.

If the second test results in a value less than or equal 1.9 TUc at Outlet or 1.66 TUc at Outlet 002, chronic effluent toxicity testing shall continue in accordance with the requirements, as prescribed herein. However, if the second test also shows an exceedance, the Director shall impose further requirements, as may be necessary.

- g. The Director may impose further requirements should the chronic effluent toxicity testing results demonstrate toxicity.
16. Effluent monitoring for the following pollutants shall be conducted using the most sensitive methods and detection levels commercially available and economically feasible.

Section C - Other Requirements

16. a. The following methods are to be used unless the permittee desires to use an EPA Approved Test Method with a listed lower method detection level. Regardless, it is recognized that detection levels can vary from analysis to analysis and that non-detect results at a different MDL for the specified test method would not constitute a permit violation.

| Parameter | EPA Method No. | Method Detection Level (ug/l) |
|------------------------------|----------------|-------------------------------|
| Thallium, Total Recoverable | 200.8 | 0.3 |
| Beryllium, Total Recoverable | 200.9 | 0.02 |
| Mercury, Total* | 245.7 | 0.0018 |
| Mercury, Total* | 1631 | 0.0002 |

*The permittee may use either Method 245.7 or Method 1631 for the analysis of mercury.

- b. The permittee may utilize the following test methods for the following pollutants so long as the laboratory achieves the MDLs listed below and reports any non-detect values down to the listed MDL.

| Parameter | EPA Method No. | Method Detection Level (ug/l) |
|-----------------------------|----------------|-------------------------------|
| Copper, Total Recoverable | 200.7 | 1.0 |
| Lead, Total Recoverable | 200.7 | 1.0 |
| Zinc, Total Recoverable | 200.7 | 4.0 |
| Nickel, Total Recoverable | 200.7 | 3.0 |
| Arsenic, Total | 200.7 | 2.0 |
| Barium, Total Recoverable | 200.7 | 10.0 |
| Antimony, Total Recoverable | 200.7 | 1.0 |
| Selenium, Total Recoverable | 200.7 | 2.0 |
| Aluminum, Total Recoverable | 200.7 | 20.0 |
| Chromium, Hexavalent | SM3500CrB | 2.0 |

- c. The analytical test procedures, set forth in 40 CFR Part 136, prescribe colorimetric methods for certain parameters. The digestion process for the performance of total recoverable is not sufficient for the utilization of a colorimetric procedure. Therefore, colorimetric procedures shall not be acceptable for the analysis of parameters prescribed as total recoverable.

17. The following conditions apply only to the package sewage treatment plant:

- a. The herein described treatment works, structures, electrical, and mechanical equipment shall be adequately protected from physical damage by the maximum expected twenty-five (25) year flood level, and operability shall be maintained during the ten (10) year flood level.
- b. The entire sewage treatment facility shall be adequately protected by fencing.
- c. Continuous maintenance and operation of the listed sewage treatment facility shall be performed by, or supervised by, a certified operator possessing at least a Class S certificate, for Waste Water Treatment Plant Operators, issued by the State of West Virginia.
- d. The permittee shall connect to a municipal or public service district sewage collection system when one becomes available; however, prior to this connection, the permittee shall obtain written permission from the municipal or public service district sewage system authority which will receive the waste and submit a request along with one (1) copy of the written permission to the Division of Water and Waste Management for approval.
- e. Without prior approval from the agency, use of intermediates, by-products, spent solvents or any other materials (except commercial grade materials), containing pollutant(s) that cannot be removed by the wastewater treatment plant is prohibited.

Section C - Other Requirements

18. Available sampling methods for total residual chlorine (TRC) are currently not sensitive enough to confirm compliance with the permit limitations imposed at the facility. Total residual chlorine (TRC) samples shall be taken, preserved and analyzed in accordance with the latest edition of 40 CFR Part 136. Because the permittee does not operate a certified wastewater laboratory at the plant site but still must comply with the instantaneous sample-type requirements, the permittee shall use an EPA Approved Method with at least a method detection level (MDL) of 100 ug/l. Any TRC sampling result reported as less than the MDL stated above shall be assumed to confirm compliance for purposes of permit enforcement. Should a more sensitive EPA approved method become available for field analysis of TRC, the permittee shall perform TRC self-monitoring in accordance with the new method. If the new method is not sensitive enough to determine compliance with specified TRC limits, analytical results reported as "not detected" at the MDL of the new method will be deemed compliant for purposes of permit enforcement.
19. Any overflows from the coal pile runoff control basin, which is designed to handle a 10-year 24-hour rainfall event, shall be reported in accordance with the bypass provisions contained in Appendix A of this permit.
20. There shall be no discharge of polychlorinated biphenyl compounds attributable to operations at the facility through any outfall.
21. The permittee shall dispose of any solids generated by the wastewater treatment plant(s) in conformance with Solid Waste Permit No. WV0075795.
22. Any debris collected at the intake shall not be returned to the waterway.
23. Neither free available chlorine nor total residual chlorine may be discharged from any unit for more than two hours in any one day and not more than one unit in any plant may discharge free available or total residual chlorine at any one time unless the utility can demonstrate to the Regional Administrator or State that the units in a particular location cannot operate at or below this level of chlorination as per Federal Effluent Guidelines 40 CFR 423.12.b.(8) and 40 CFR 423.13.d.(2). Simultaneous multi-unit chlorination is permitted.
24. The permittee shall use analytical test method 2540 C from the the 20th edition of Standard Methods for the analysis of total dissolved solids (TDS).
25. The temperature measurements collected to calculate the difference between the Upstream/Intake temperature and the discharge temperature required in Section A.001 and Section A.002 of this permit shall be collected concurrently. There shall be no more than thirty minutes between temperature monitoring collected at the intake and the discharges.
26. The permittee shall not make any changes pertaining to the land use including new construction, storage of new/additional materials or diversion of additional runoff within the drainage area for stormwater Outlets 011 and 014 without prior notification to the Division of Water and Waste Management.

STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) ALLEGHENY ENERGY SUPPLY CO CERTIFIED LABORATORY NAME: _____
 LOCATION OF FACILITY: HAYWOOD; Harrison County CERTIFIED LABORATORY ADDRESS: _____
 PERMIT NO.: WV0005339 OUTLET NO.: 012
 WASTELOAD FOR THE MONTH OF: _____ INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | | Quantity | | | Other Units | | | | | | Measurement Frequency | Sample Type | | |
|--------------------------------|---------------|----------|-----|-------|-------------|------------|--------------|------------|------|-------|-----------------------|-------------|-----------|--|
| | | | | Units | N.E. | | | | CEL* | Units | | | N.E. | |
| 50050 (ML-1) RF-B | Reported | | | | | | | | | | | | | |
| Flow, in Conduit or thru plant | Permit Limits | N/A | N/A | | | N/A | Rpt Only | Rpt Only | N/A | mgd | | 1/quarter | Estimated | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |
| 00530 (ML-1) RF-B | Reported | | | | | | | | | | | | | |
| Total Suspended Solids | Permit Limits | N/A | N/A | | | N/A | Rpt Only | Rpt Only | N/A | mg/l | | 1/quarter | Grab | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |
| 00400 (ML-1) RF-C | Reported | | | | | | | | | | | | | |
| pH | Permit Limits | N/A | N/A | | | Rpt Only | N/A | Rpt Only | N/A | S.U. | | 1/6 months | Grab | |
| Year Round | | | | | | Inst. Min. | | Inst. Max. | | | | | | |
| 01119 (ML-1) RF-C | Reported | | | | | | | | | | | | | |
| Copper, Total Recoverable | Permit Limits | N/A | N/A | | | N/A | Rpt Only | Rpt Only | N/A | mg/l | | 1/6 months | Grab | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |
| 01094 (ML-1) RF-C | Reported | | | | | | | | | | | | | |
| Zinc, Total Recoverable | Permit Limits | N/A | N/A | | | N/A | Rpt Only | Rpt Only | N/A | mg/l | | 1/6 months | Grab | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |
| 71900 (ML-1) RF-C | Reported | | | | | | | | | | | | | |
| Mercury, Total (as Hg) | Permit Limits | N/A | N/A | | | N/A | Rpt Only | Rpt Only | N/A | ug/l | | 1/6 months | Grab | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |
| 01104 (ML-1) RF-B | Reported | | | | | | | | | | | | | |
| Aluminum, Total Recoverable | Permit Limits | N/A | N/A | | | N/A | Rpt Only | 0.75 | N/A | mg/l | | 1/quarter | Grab | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |
| 00980 (ML-1) RF-B | Reported | | | | | | | | | | | | | |
| Iron, Total Recoverable | Permit Limits | N/A | N/A | | | N/A | Rpt Only | 1.5 | N/A | mg/l | | 1/quarter | Grab | |
| Year Round | | | | | | | Avg. Monthly | Max. Daily | | | | | | |

* CEL = Compliance Evaluation Level

| | | |
|---|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed |
| | | Signature of Principal Executive Officer or Authorized Agent |

STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) ALLEGHENY ENERGY SUPPLY CO
 LOCATION OF FACILITY: HAYWOOD; Harrison County
 PERMIT NO.: WV0005339 OUTLET NO.: 012
 WASTELOAD FOR THE MONTH OF: _____

CERTIFIED LABORATORY NAME: _____
 CERTIFIED LABORATORY ADDRESS: _____
 INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | | Quantity | | | Other Units | | | | | | Measurement Frequency | Sample Type | |
|--|---------------|----------|-----|-------|-------------|-----|--------------------------|------------------------|------|-------|-----------------------|-------------|------|
| | | | | Units | N.E. | | | | CEL* | Units | | | N.E. |
| 00981 (ML-1) RF-C Selenium, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 00978 (ML-1) RF-C Arsenic, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 70295 (ML-1) RF-C Solids, Total Dissolved (TDS) Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 81020 (ML-1) RF-C Sulfate Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01059 (ML-1) RF-C Thallium, Total (as Tl) Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01220 (ML-1) RF-C Chromium, Hex. Diss. Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| | | | | | | | | | N/A | | | | |
| | | | | | | | | | N/A | | | | |

* CEL = Compliance Evaluation Level

| | | | |
|---|--|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed | |
| | | Signature of Principal Executive Officer or Authorized Agent | |
| Title of Officer | | | |

STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) ALLEGHENY ENERGY SUPPLY CO
 LOCATION OF FACILITY: HAYWOOD; Harrison County
 PERMIT NO.: WV0005339 OUTLET NO.: 013
 WASTELOAD FOR THE MONTH OF: _____

CERTIFIED LABORATORY NAME: _____
 CERTIFIED LABORATORY ADDRESS: _____
 INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | | Quantity | | | Other Units | | | | | | Measurement Frequency | Sample Type | |
|---|---------------|----------|-----|-------|-------------|------------------------|--------------------------|------------------------|------|-------|-----------------------|-------------|-----------|
| | | | | Units | N.E. | | | | CEL* | Units | | | N.E. |
| 50050 (ML-1) RF-B Flow, in Conduit or thru plant Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mgd | | 1/quarter | Estimated |
| 00530 (ML-1) RF-B Total Suspended Solids Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/quarter | Grab |
| 00400 (ML-1) RF-C pH Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | N/A | S.U. | | 1/6 months | Grab |
| 01119 (ML-1) RF-C Copper, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01094 (ML-1) RF-C Zinc, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 71900 (ML-1) RF-C Mercury, Total (as Hg) Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | ug/l | | 1/6 months | Grab |
| 01104 (ML-1) RF-B Aluminum, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | N/A | mg/l | | 1/quarter | Grab |
| 00980 (ML-1) RF-B Iron, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | N/A | mg/l | | 1/quarter | Grab |

* CEL = Compliance Evaluation Level

| | | |
|---|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed |
| | | Signature of Principal Executive Officer or Authorized Agent |
| Title of Officer | | |

STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) ALLEGHENY ENERGY SUPPLY CO CERTIFIED LABORATORY NAME: _____
 LOCATION OF FACILITY: HAYWOOD, Harrison County CERTIFIED LABORATORY ADDRESS: _____
 PERMIT NO.: WV0005339 OUTLET NO.: 013
 WASTELOAD FOR THE MONTH OF: _____ INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | | Quantity | | | Other Units | | | | | | Measurement Frequency | Sample Type | |
|--|---------------|----------|-----|-------|-------------|-----|--------------------------|------------------------|------|-------|-----------------------|-------------|------|
| | | | | Units | N.E. | | | | CEL* | Units | | | N.E. |
| 00981 (ML-1) RF-C Selenium, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 00978 (ML-1) RF-C Arsenic, Total Recoverable Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 70295 (ML-1) RF-C Solids, Total Dissolved (TDS) Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 81020 (ML-1) RF-C Sulfate Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01059 (ML-1) RF-C Thallium, Total (as Tl) Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01220 (ML-1) RF-C Chromium, Hex. Diss. Year Round | Reported | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| | | | | | | | | | N/A | | | | |
| | | | | | | | | | N/A | | | | |

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* CEL = Compliance Evaluation Level

| | | | |
|-------------------------------------|--|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed | |
| Title of Officer | | Signature of Principal Executive Officer or Authorized Agent | |

STATE OF WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER AND WASTE MANAGEMENT

FACT SHEET ADDENDUM

1. **NAME AND ADDRESS OF APPLICANT**
ALLEGHENY ENERGY SUPPLY COMPANY, LLC
800 CABIN HILL DR
GREENSBURG, PA 15601
2. **NAME AND ADDRESS OF FACILITY**
HARRISON POWER STATION
STATE RT 20
HAYWOOD, WV 26366
3. **STATE NPDES APPLICATION NO.** WV0005339
4. **COUNTY** Harrison
RECEIVING STREAM West Fork River
5. **PUBLIC NOTICE NO.** L-93-13
COMMENT PERIOD: From 09/06/2013 To 10/06/2013
6. **SIC CODE(s)** 4911

**Note: This is an addendum to the original FACT SHEET.
Only items changed in the permit are addressed in this addendum.**

7. DESCRIPTION OF APPLICANT'S FACILITY OR ACTIVITY

Steam Electric Power Generating Station consisting of three (3) 640 MW coal-fired units. The turbine condensers utilize West Fork River water in a closed cycle cooling process utilizing two (2) cooling towers.

10. RATIONALE FOR PROPOSED EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Outlets 011, 012, 013 (stormwater only)

The current permit allows for the discharge of untreated storm water from a large drainage area via Outlet 011. As part of the May 5, 2011 permit reissuance, historical exceedances of benchmark values led to the agency determining that there was reasonable potential to exceed water quality and water quality based effluent limits were imposed at Outfall 011 for aluminum and zinc. The permittee was also issued Order No. 7004 dated the 5th day of May 2011. The order required the permittee to submit a corrective action plan identifying the causes of the exceedances of stormwater benchmark values and to address the benchmark exceedances. The permittee submitted a major permit modification and required information dated January 31, 2013. The permittee has proposed to segregate the storm water associated with industrial activity from the storm water that is in no exposure areas (no area of industrial activity). The permittee is proposing to segregate the majority of the contaminated storm water associated with industrial activity and route this wastewater through a series of two sediment ponds with ultimate discharge and disposal through newly designated Outlet 012. Outlet 012 will actually be piped back into and mixed with the no exposure area storm water and discharged through existing Outlet 011. All remaining contaminated storm water associated with industrial activity will be routed through a separate sediment pond for treatment and ultimate discharge through new Outlet 013. As this proposal is a compliance solution to address high pollutant levels associated with industrial activity, the previous monitoring requirements and limits from Outlet 011 shall be imposed on new Outlets 012 and 013. Outlet 011 will discharge storm water that is not associated with industrial activity and treated storm water from Outlet 012 that is associated with industrial activity. Since the compliance monitoring location for Outlet

10. RATIONALE FOR PROPOSED EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

012 is prior to mixing with the no exposure storm water, all monitoring requirements at Outlet 011 are being removed from the permit.

These changes to the facility's storm water drainage areas were observed during a July 1, 2013 site visit to the facility by the WVDEP.

Outlet 014

Also, during the site visit, a storm water pipe was discovered discharging which was not previously included in the facility's NPDES permit. The pipe is located just north of the existing Outlet 011 and new Outlet 013 locations. The discharge from the pipe consists of non-industrial related stormwater runoff from the area just west of the existing wastewater treatment lagoon. This discharge is being designated as new Outlet 014. No monitoring requirements are being imposed on the new outlet since there is no industrial activity in the drainage area.

11. RATIONALE FOR VARIANCE DECISIONS

N/A

13. ANTIDegradation

An antidegradation review was conducted. Tier 1 protection is provided for all uses of the West Fork River.

14. OTHER REQUIREMENT(s)

N/A

Devereux, Lori K

From: Sweeney, Matthew L
Sent: Wednesday, September 04, 2013 8:13 AM
To: Devereux, Lori K
Subject: Fwd: Harrison

Lori,

Scan and email the WV0005339 mod to Joe Lapcevic below.

Begin forwarded message:

From: <jlapcev@firstenergycorp.com>
Date: September 4, 2013, 7:28:05 AM EDT
To: "Sweeney, Matthew L" <Matthew.L.Sweeney@wv.gov>
Subject: RE: Harrison

Thanks Matt - Could you possibly email a copy of it to me?

Joe Lapcevic

Senior Scientist
(724) 838 - 6099 work
(234) 678 - 2385 fax
FirstEnergyCorp.
800 Cabin Hill Drive
Greensburg, PA 15601-1689

From: "Sweeney, Matthew L" <Matthew.L.Sweeney@wv.gov>
To: <jlapcev@firstenergycorp.com>
Date: 09/03/2013 08:13 PM
Subject: RE: Harrison

Joe,

I got your message today. Ryan had completed the draft modification a while back. I was just able to begin reviewing it last week. I finished my review and it will be sent out tomorrow for public notice.

Thanks,
Matt Sweeney, P.E.
NPDES Individual Permitting Supervisor
WV Department of Environmental Protection
Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304
(304) 926-0495

From: jlapcev@firstenergycorp.com [<mailto:jlapcev@firstenergycorp.com>]
Sent: Thursday, August 15, 2013 5:11 PM
To: Sweeney, Matthew L
Subject: Re: Harrison

Matt,

The request was for the modifications that were made to storm water outlet 011. There is a **new outlet** and the original sample point for 011 is to be moved. Other improvements were made, but **don't require** a permit Mod. I know Ryan McCloughlin originally thought the modification request was for the **translator** study, but after his and John Lockhart's site visit he understood it is for the Mod. of the **storm water outlets** that we really need. I'm off tomorrow, but e-mail me if you have any questions and I'll respond – **give you** a call.

Thanks,

Joe Lapcevic

Senior Scientist
(724) 838 - 6099 work
(234) 678 - 2385 fax
FirstEnergyCorp.
800 Cabin Hill Drive
Greensburg, PA 15601-1689

From: "Sweeney, Matthew L" <Matthew.L.Sweeney@wv.gov>
To: <jlapcev@firstenergycorp.com>
Date: 08/15/2013 05:00 PM
Subject: Harrison

Joe,

I just finished up the review of the letters for the usage of the new chemicals at Harrison. They should **be in the** mail tomorrow. I hope to send the Harrison modification to public notice by the end of next week.

Thanks,

Matt Sweeney, P.E.
NPDES Individual Permitting Supervisor
WV Department of Environmental Protection
Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304
(304) 926-0495

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Devereux, Lori K

From: jlapcev@firstenergycorp.com
Sent: Friday, October 04, 2013 10:47 AM
To: Devereux, Lori K
Cc: Clevenger, Anne R "Renee"
Subject: Comments - Harrison Draft NPDES Permit Mod.#3
Attachments: CommentsMod#3SW_Outlets011-014jpl.pdf

Lori,

As discussed, the attached file contains our comments on the draft permit modification recently issued for Harrison Power Station. The attachment may have been omitted from our FedEx package, which you should receive **today**. The attachment is a letter from Mr. Scott Mandirola to the WV-Chamber & Manufactures Associations. **Please** let me know that you have received this e-mail submission.

Thanks,

Joe Lapcevic

Senior Scientist
(724) 838 - 6099 work
(234) 678 - 2385 fax
FirstEnergyCorp.
800 Cabin Hill Drive
Greensburg, PA 15601-1689

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RECEIVED OCT 04 2013



Allegheny Energy

800 Cabin Hill Drive
Greensburg, PA 15601

FEDERAL EXPRESS

October 3, 2013

Attn: Debbie McCann, Permitting Section
Division of Water and Waste Management
WV Department of Environmental Protection
601 - 57th Street
Charleston, WV 25304-2345

Re: Harrison Power Station
Harrison County, Haywood, WV
Modification No. 3
NPDES Permit WV0005339

Dear Ms. McCann:

Allegheny Energy Supply Company, LLC ("AESC"), a subsidiary of Allegheny Energy, Inc., now owned by FirstEnergy Corp., hereby submits the following comments on the draft WV/NPDES Permit Modification No. WV0005339-C (the "Draft Permit") for the Harrison Power Station (the "Station"), located in Haywood, Harrison County, West Virginia. The Draft Permit was issued for public comment by the West Virginia Department of Environmental Protection ("WVDEP") on September 6, 2013. AESC appreciates the opportunity to offer these comments on the Draft Permit and requests that the agency carefully consider the concerns raised herein prior to issuance of the final permit modification.

A. NUMERIC DISCHARGE LIMITATIONS FOR NEW OUTLETS 012 AND 013

In conjunction with improvements to the overall stormwater management system at the Station, the Draft Permit designates new Outlets 012 and 013 for the discharge of stormwater only. At both outfalls, the Draft Permit includes immediately effective maximum daily discharge limitations for aluminum (0.75 mg/L) and iron (1.5 mg/L). See Draft Permit at 41 of 56 and 43 of 56.

AESC objects to the imposition of numeric discharge limitations at these new outlets, rather than benchmark values and corresponding "report only" requirements. Significantly, WVDEP's decision to include enforceable limits immediately upon the designation of new stormwater outfalls appears to contradict stated agency policy regarding the permitting of stormwater at industrial facilities as set forth in the May 30, 2012 letter from Scott Mandirola, Director of the Division of Water and Waste Management, to the West Virginia Chamber of Commerce, West Virginia Manufacturers Association and the Utilities, Telecommunications and Energy Coalition (collectively, the "Associations"), a copy of which is attached hereto as Attachment A. In that letter to the Associations, Director Mandirola represented that WVDEP's standard practice in permitting stormwater discharges from industrial facilities is to establish benchmark values and require implementation and modification of a stormwater pollution prevention plan ("SWPPP") designed to achieve these benchmarks. Only in "extreme cases where a permittee has not implemented an effective SWPPP" will the agency determine that "water quality-based effluent limits [should be included] on such stormwater discharges if they exhibit a reasonable potential to exceed water quality criteria." Attachment A at 2. Thus, the agency's practice is to impose numeric discharge limitations only as a measure of last resort when a facility has failed to demonstrate an effective SWPPP over an extended period of time.

That is not the case here, and the Fact Sheet for the Draft Permit fails to provide any justification for this departure from the agency's established stormwater permitting policy. Notwithstanding the compliance history of other stormwater outfalls at the Station, Outlets 012 and 013 are new outlets with no history of exceedances of the benchmark values. Indeed, WVDEP's immediate inclusion of numeric limits in the Draft Permit effectively denies the Station any opportunity to demonstrate achievement with the benchmark values and thereby avoid numeric limits. This approach also precludes the Station from ever "waiving" the monitoring requirements for aluminum and iron at these outlets through the collection of four consecutive samples below the corresponding benchmark value in accordance with Condition C.13.c of the permit. For all of these reasons, AESC requests that the numeric discharge limitations for aluminum and iron at Outlets 012 and 013 be deleted from the Draft Permit and replaced with "report only" requirements consistent with the agency's standard stormwater permitting procedures.

B. PENDING ALUMINUM TRANSLATOR

With respect to the aluminum discharge limitations at Outlets 012 and 013 specifically, AESC further notes that it has submitted to the agency a site-wide translator study that would directly impact these limits, if not eliminate them entirely based on a lack of reasonable potential to cause or contribute to a violation of water quality standards. Without waiving its objection to any numerical limits for these stormwater discharges, AESC encourages WVDEP to review this translator study to assess its applicability to these new outfalls.

C. LIST OF STATION OUTLETS

AESC notes that a revised version of page 2 of 56 was not included with the Draft Permit reflecting an updated list of permitted outfalls. Before issuing the final permit, WVDEP should revise page 2 of 56 to (1) add new Outlets 012, 013 and 014 and (2) state that no monitoring is required from Outlets 011 and 014 in light of the No Exposure Certification ("NEC").¹

D. SECTION C CONDITIONS

As the agency is aware, AESC appealed the Station's most recent permit reissuance (dated May 5, 2011) to the West Virginia Environmental Quality Board. That appeal includes challenges to certain terms and conditions of Section C of the permit. Because WVDEP has included the entirety of Section C in the Draft Permit, AESC requests confirmation from the agency that this modification will supersede only those terms and conditions of Section C to which changes have been proposed (i.e., such that AESC will not have to initiate a new appeal proceeding to preserve its challenges to terms and conditions of Section C unrelated to this modification). See W. Va. Code R. 47-10-9.1.a (stating that "[w]hen a permit is modified, only the conditions subject to modification are reopened. All other conditions of the permit shall remain in effect for the duration of the permit").

¹ To minimize confusion, AESC will install outlet markers at Outlet 011 and 014 that reflect the NEC status of these outfalls.

Attn: Debbie McCann, Permitting Section
October 3, 2013
Page 3

E. Electronic Discharge Monitoring Report System (eDMR) Concerns

As proposed, Outlets 012 and 013 contain both once per quarter and once per 6-months monitoring requirements. As documented by pages 15 and 16 of the WVDEP's eDMR Reporting User's Guide, rev. August 7, 2013 (and prior), a monthly requirement is to be submitted by the 20th of the following month. A quarterly requirement is to be submitted on the DMR for the month ending each calendar quarter. However, biannual and annual permit requirements are only considered acceptable to the eDMR system when submitted in accordance with rules dependent upon the original date of permit issuance and the day of the month in which that permit was issued. This can result in a circumstance where, for a given outlet, on certain months no DMR will be submitted, on other months certain quarterly parameters will be submitted, and on yet other months only certain bi-annual results, but no quarterly results, can be submitted. This matter can be further complicated by a circumstance such as this, wherein a permit modification is issued to an existing permit. In this case, not only can the annual and biannual monitoring requirements differ in submittal date from the quarterly requirements, but can also differ in submittal date from other biannual parameters contained within the very same permit. The permittee believes the WVDEP's system to be unnecessarily complex as evidenced by neighboring Pennsylvania's requirement that all quarterly requirements are to be submitted in accordance with calendar quarters, biannual requirements be submitted following June and December, and annual requirements be submitted following December. PADEP also uses an electronic DMR system. PADEP submits data from its permittees to the very same USEPA database as the WVDEP. The permittee requests that the WVDEP explain why it believes it is necessary for the WVDEP's system to differ from the vastly simpler method employed by the PADEP for this same task.

F. UPCOMING TRANSFER OF OWNERSHIP TO MONONGAHELA POWER COMPANY

Ownership of Harrison Power Station is in the process of being transferred from AESC to Monongahela Power Company (MonPower). Both of these entities are wholly owned subsidiaries of Allegheny Energy, Inc., which is owned by FirstEnergy Corp. Once the transfer of ownership is completed the appropriate paperwork will be filed with the Agency to reflect this ownership change on Harrison's NPDES permit.

Conclusion

AESC appreciates the opportunity to submit these comments for WVDEP's review and consideration. Should you have any questions or concerns, please contact Joe Lapcevic at (724) 838-6099.

Sincerely,



Joseph P. Lapcevic
Senior Scientist

cc: M. A. Bradley - Spilman Thomas & Battle (Charleston, WV)
Renee Clevenger - WVDEP
James E. Graf - WV-HRPS



west virginia department of environmental protection

Division of Water & Waste Management
601 57th Street SE
Charleston, WV 25304
Phone: 304-926-0495
Fax: 304-926-0463

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

May 30, 2012

Tom Boggs, Vice President
WV Chamber of Commerce
1624 Kanawha Blvd. East
Charleston, WV 25311

Karen Price, President
West Virginia Manufacturers Association
2001 Quarrier Street
Charleston, WV 25311

Jack Harrison
Utilities, Telecommunications and Energy Coalition of WV
1600 Pennsylvania Ave.
PO Box 1906
Charleston, WV 25327

Re: WVDEP Stormwater Permitting for Industrial Facilities

Dear Ms. Price and Mr. Boggs and Harrison:

This letter is in response to the correspondence received by this office on April 2, 2012 from the WV Chamber of Commerce, WV Manufacturers Association, and the Utilities, Telecommunications and Energy Coalition (collectively, the Associations) regarding concerns with the West Virginia Department of Environmental Protection's (WVDEP) Division of Water and Waste Management's (DWWM) permitting approach with stormwater discharges in individual W/VPDES permits.

The DWWM's methodology for permitting stormwater is essentially a best management practices approach that consists of a stormwater pollution prevention plan (SWPPP) and a monitoring program to establish the effectiveness of the SWPPP. Facilities can reduce the level of pollutants in stormwater runoff from their sites through the development and proper implementation of an effective SWPPP. "Benchmark" concentrations for pollutants are established to represent a level of concern with stormwater discharges. The level of concern represents a standard above

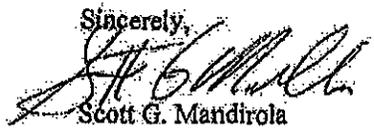
Promoting a healthy environment.

which water quality concerns could arise. Benchmarks provide an appropriate level to determine whether a facility's SWPPP has been successfully implemented.

The DWWM believes that each of these benchmark values represents a reasonable level below which water quality impacts should not occur and they, therefore, represent a useful level to assess whether a SWPPP is controlling pollution in the stormwater discharges. If benchmark values are not being achieved, the SWPPP is not effective and impacts on water quality from stormwater discharges become a concern. WV/NPDES permits contain provisions to require facilities to have an effective SWPPP and, if benchmarks are exceeded, require the permittee to revise and implement revisions to the SWPPP for the sole purpose of reducing pollutant levels in the stormwater discharge in order to have an effective SWPPP. Further conditions are imposed in WV/NPDES permits that notify the permittee that if there is evidence indicating potential or realized impacts on water quality due to any stormwater discharge covered by the permit, the permit may be promptly modified and/or reissued to include effluent limitations and/or other requirements to control such stormwater discharges.

The methodology explained above defines the DWWM's normal approach on stormwater discharges. However, many permits have contained these requirements in them for one, two, or even three permit cycles and some facilities have routinely exceeded benchmark values for five to fifteen years and have failed to develop, revise, and implement an effective SWPPP for the site. While exceeding benchmarks is not a violation of the permit, failure of the permittee to develop, revise, and implement an effective SWPPP for the site is a violation of the permit. As noted above, the agency also has concerns with water quality impacts from stormwater discharges where facilities have not implemented an effective SWPPP. In the extreme cases where a permittee has not implemented an effective SWPPP, the DWWM has modified its methodology in permits to include water quality-based effluent limits on such stormwater discharges if they exhibit a reasonable potential to exceed water quality criteria. The imposition of these limitations guarantees that the necessary provisions are implemented in the permit to ensure that potential water quality impacts are being controlled. It should be noted that this approach is only being utilized by the agency in cases where facilities have not demonstrated an effective SWPPP. In cases where facilities have demonstrated an effective SWPPP, the DWWM continues to impose the SWPPP/benchmark approach discussed above.

The WVDEP appreciates the opportunity to provide this information regarding permitting of stormwater discharges. In closing it is important to reiterate that applying WQBELs to stormwater discharges is not our preferred method of dealing with these outfalls and is only done in situations where permit conditions are not being met in relation to updating the SWPPP to address the issue. If you should have any questions or concerns in this regard, please contact me at (304) 926-0499 at extension 1546.

Sincerely,

Scott G. Mandirola
Director

CC: Randy Huffman

McGlothen, Ryan K

From: McGlothen, Ryan K
Sent: Thursday, October 10, 2013 3:03 PM
To: 'jlapcev@firstenergycorp.com'
Subject: NEC for Harrison Power Station Permit Modification

Joe, as discussed with you previously. The following is the comment received from the EPA on the **draft** permit modification for WV0005339:

"1. Please clarify whether a No Exposure Certification was provided by the facility for Outlets 011 and **O14** in accordance with 40 CFR 122.26(g)(1), and including the information required at 40 CFR 122.26(g)(4). "

For your convenience I looked up the federal code referenced in their comment

<http://www.ecfr.gov/cgi-bin/text-idx?c=ecfr&SID=2b2582bfabd9b8788ffc030f0325124b&rgn=div8&view=text&node=40:23.0.1.1.12.2.6.6&idno=40>

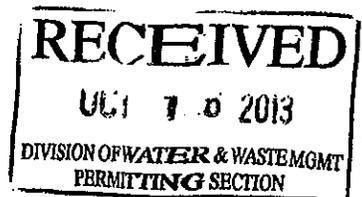


FEDERAL EXPRESS

October 15, 2013

Mr. Scott G. Mandirola
Director, Division of Water and Waste Management
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV 25304-2345

**Re: Harrison Power Station
Harrison County, Haywood, WV
Modification No. 3
NPDES Permit WV0005339**



Dear Director Mandirola:

By letter dated October 3, 2013, Allegheny Energy Supply Company, LLC ("AESC") submitted **comments** on the draft Modification of WV/NPDES Permit No. WV0005339 for the Harrison Power Station (**the "Station"**). This modification will allow AESC to implement improved Best Management Practices ("**BMPs**") for stormwater discharges, including the addition of new stormwater outlets, at the Station.

In order that AESC may begin the implementation of these new BMPs during the current **construction** season, we respectfully request that, consistent with the comments filed, the West Virginia Department of Environmental Protection issue the permit modification at your earliest convenience. Once the **final** modification is issued, the Station will be able to complete construction activities necessary to **direct** stormwater runoff to the newly constructed sedimentation basin that will discharge via Outlet 013. We recognize that your agency has many permitting issues currently pending, but we believe that the **prompt** issuance of this permit modification will result in improved quality in the stormwater discharges **from** the Station and the water quality in the West Fork.

We thank you in advance for your consideration of this request. Please feel free to contact me **directly** at (724) 838-6099 should you have any questions, or desire additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joseph P. Lapcevic'.

Joseph P. Lapcevic
Senior Scientist

c: Renee Clevenger - WVDEP
Mr. Ryan McGlothen - WVDEP
Mr. Yogesh Patel - WVDEP

US Postal Service - Overnight

November 14, 2013

Mr. Scott G. Mandirola
Director, Division of Water and Waste Management
West Virginia Department of Environmental Protection
601 57th Street SE
Charleston, WV 25304-2345

**Re: Harrison Power Station
Harrison County, Haywood, WV
Modification No. 3
NPDES Permit WV0005339**

NOV 25 2013

Dear Director Mandirola:

Mr. Ryan McGlothen of your staff requested that I provide written certification to verify that approximately 45-acres of drainage area in Harrison Power Station's (Harrison) Outlet 011 watershed is not impacted by industrial activity and qualifies for "No Exposure Certification" (NEC). Harrison's storm water Outlet 011's drainage area encompasses approximately 80-acres, of which only 35-acres are associated with Harrison Power Station's operations. The remaining 45-acres encompass an undeveloped, forested upland area that was never associated with industrial activities. Because this 45-acre area drains a forested upland area that has no industrial impacts associated with the Harrison complex, it was identified as an NEC area by our consultant (URS, Inc., Pittsburgh, PA) in our NPDES Permit Modification request.

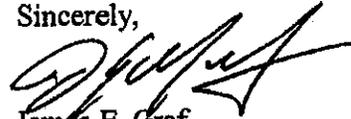
To minimize the size of structural BMPs necessary for improving water quality in the Outlet 011 drainage area, storm water runoff from the 45-acre forested upland area was physically segregated from the 35-acre portion associated with Harrison's industrial activities. To clarify further, our modification application designated the drainage area currently identified as Outlet 011 in Harrison's current NPDES permit as only the 35-acres associated with industrial activity. The recently issued NPDES Permit Modification No. 3 assigned new discharge points (Outlet Numbers 012 & 013) for the BMPs that were installed.

The 45-acre portion draining the forested upland area never should have been included as part of Harrison's industrially impacted storm water drainage area. But, until curbing and berms were installed to physically segregate this portion from the Harrison industrial complex, storm water runoff discharge via Outlet 011 was mixed.

This letter is to certify that the 45-acre portion in Harrison's Outlet 011 storm water drainage area and discussed in detail above is not impacted by industrial activities, remains undeveloped, and will not be developed in the future without notification to the Division.

Should you have any questions, or wish to discuss this matter in more detail, please contact Mr. Joseph Lapcevic at (724) 838-6099.

Sincerely,



James E. Graf
Director, Harrison Power Station

c: Mr. Yogesh Patel - WVDEP
Mr. Ryan McGlothen - WVDEP

bc: M. A. Bradley – Spilman Thomas & Battle (Charleston, WV)
Renee Clevenger - WVDEP
James E. Graf – WV-HRPS W. E. Cannon
J. A. Ford – WV - HRPS
A. W. Hoalcraft – HRPS
M. J. Jirousek – A-Go-13
P. E. Marks
J. A. Meade
Master File

Devereux, Lori K

From: Sweeney, Matthew L
Sent: Tuesday, December 03, 2013 5:17 PM
To: Devereux, Lori K
Subject: FW: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

EPA comments

From: Walker, Dana [mailto:Walker.Dana@epa.gov]
Sent: Monday, September 30, 2013 3:45 PM
To: Sweeney, Matthew L
Cc: Patel, Yogesh P; Trulear, Brian
Subject: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

Matt,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III **has** received the draft National Pollutant Discharge Elimination System (NPDES) permit modification for:

Allegheny Energy Supply – Harrison Power Station
NPDES Number: WV0005339
EPA Received: September 4, 2013

This is a major permit that is being modified to address changes to the facility's stormwater areas. **Therefore**, I have performed a limited review based on the proposed changes. I have completed my review and offer **the following** comment:

1. Please clarify whether a No Exposure Certification was provided by the facility for Outlets 011 and **O14** in accordance with 40 CFR 122.26(g)(1), and including the information required at 40 CFR 122.26(g)(4).

Please address the above and provide me with any changes to the draft permit and/or Fact Sheet, if **necessary**. Any questions, give me a call.

Thank you,
Dana

Dana Walker
NPDES Permits Branch (3WP41)
Water Protection Division
US EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.2928
Email: walker.dana@epa.gov

McGlothen, Ryan K

From: Sweeney, Matthew L
Sent: Wednesday, January 15, 2014 3:01 PM
To: McGlothen, Ryan K
Subject: FW: WV0005339 Harrison Station
Attachments: NEC Form+SubmittalLetterWV0005339-011&014.pdf

Ryan, print email and attachment and place in application file.

From: jlapcev@firstenergycorp.com [<mailto:jlapcev@firstenergycorp.com>]
Sent: Wednesday, January 15, 2014 2:41 PM
To: Sweeney, Matthew L
Subject: Re: WV0005339 Harrison Station

Matt,

Attached is a pdf of the signed NEC forms for Outlets 011 & 014 and a topo depicting Harrison's storm water drainage areas. I'm still working on Ft. Martin's and discussed meeting John Lockhart on-site to review exactly what we are doing their, so that he has a better understanding of the changes we're making to Ft. Martin's storm water drainage system. As always, let me know if you questions.

Thanks,

Joe Lapcevic

Senior Scientist
(724) 838 - 6099 work
(234) 678 - 2385 fax
FirstEnergyCorp.
800 Cabin Hill Drive
Greensburg, PA 15601-1689

From: "Sweeney, Matthew L" <Matthew.L.Sweeney@wv.gov>
To: <jlapcev@firstenergycorp.com>
Date: 12/09/2013 07:45 PM
Subject: WV0005339 Harrison Station

Joe,

I'm still trying to get EPA approval for this modification. Please fill out the attached form for Outlets 011 and 014 (as identified in the fact sheet of the draft modification). Filling these out should hopefully address this issue and result in EPA approval.

You will also receive a similar email request for your Fort Martin facility in the near future.

Thanks,

Matt Sweeney, P.E.
NPDES Individual Permitting Supervisor
WV Department of Environmental Protection
Division of Water and Waste Management

601 57th Street, SE
Charleston, WV 25304
(304) 926-0495

[attachment "Stormwater NO EXPOSURE Form.pdf" deleted by Joseph P Lapcevic/FirstEnergy]

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CERTIFIED MAIL

7011 0470 0000 0144 2137

January 16, 2014

Mr. Mathew L. Sweeney
Permitting Supervisor, Division of Water and Waste Management
Permitting Section
WV Department of Environmental Protection
601 57th Street, East
Charleston, West Virginia 25304-2345

Re: Harrison Power Station
Storm Water Outlets 011 and 014
No Exposure Certification Form
WV/NPDES Permit No. WV0005339

Dear Mr. Sweeney:

As requested, enclosed are completed No Exposure Forms for Harrison's storm water Outlets 011 and 014. A topography map of the site with drainage areas delineated is also enclosed.

Harrison's storm water Outlet 011's drainage area encompasses approximately 80-acres, of which only 35-acres are associated with Harrison Power Station's operations. The remaining 45.5-acres encompass an undeveloped, forested upland area that was never associated with industrial activities. Because this 45.5-acre area drains a forested upland area that has no industrial impacts associated with the Harrison complex, it was identified as an NEC area by our consultant (URS, Inc., Pittsburgh, PA) that advised Harrison on their storm water best management practices (BMPs).

To minimize the size of structural BMPs necessary for improving water quality in the Outlet 011 drainage area, storm water runoff from the 45.5-acre forested upland area was physically segregated from the 35-acre portion associated with Harrison's industrial activities. To clarify further, our modification application designated the drainage area currently identified as Outlet 011 in Harrison's current NPDES permit as only the 35-acres associated with industrial activity. The recently issued NPDES Permit Modification No. 3 assigned new discharge points (Outlet Numbers 012 & 013) for the BMPs that were installed to treat the industrially impacted drainage area (35-acres).

The 45.5-acre portion draining the forested upland area never should have been included as part of Harrison's industrially impacted storm water drainage area. But, until curbing and berms were installed to physically segregate this portion from the Harrison industrial complex, storm water runoff discharged via Outlet 011 was mixed.

Mr. Mathew L. Sweeney

January 16, 2014

Page 2

Harrison's storm water Outlet 014's drainage area encompasses approximately 4.5-acres and drains the swale located between the lagoons' access roadways. Because storm water runoff from the roadways is directed either to the new sedimentation pond associated with Outlet 013, or directly to the lagoons, no industrial activities occur within this drainage area. Therefore, Outlet 014 qualifies for designation as a No Exposure Certification area.

Should you have any questions regarding these storm water drainage areas, or need anything further to issue Modification No. 3, please contact me directly at (724) 838-6099.

Sincerely,



Joseph P. Lapcevic
Senior Scientist

Enclosures:

c: J. E. Graf - WV-HRPS

Please See Instructions Before Completing This Form

NPDES
FORM



**NO EXPOSURE CERTIFICATION for Exclusion from
Storm Water Monitoring in an Individual NPDES Permit**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require monitoring for a specific storm water discharge in the State of West Virginia due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each Outlet qualifying for the no exposure exclusion. If any industrial activities or materials are or will be exposed to precipitation for a particular outlet, the facility is not eligible for the no exposure exclusion for that outlet.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at this facility or site, and is obligated to comply with terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3, 4, and 5.

A. Facility Owner

Monongahela Power Co. - Harrison Power Station
Name: Charles E. Jones, President Phone: (330) 761 - 7775 Email Address: jonesc@firstenergycorp.com
Address: 76 South Main Street
City: Akron State: OH ZIP Code: 44308

Facility Operator (If applicable)

Name: James E. Graf, Director Harrison Power Station Phone: (304) 584 - 2233 Email Address: jgraf@firstenergycorp.com
Address: PO Box 600
City: Haywood State: WV Zip Code: 26366-0600

B. Facility/Site Location Information

Name: James E. Graf, Director - Harrison Power Station
Address: PO Box 600 City: Haywood
ZIP Code: 26366-0600
County: Harrison Is a Topographic Map with the Outlet Location Enclosed? Yes
Latitude: 39-deg. / 22-min. / 53-sec. Longitude: 80-deg. / 19-min. / 09-sec.

B. (Continued)

1. Please list your Individual WV/NPDES Permit No. WV0005339
2. Please list the Outlet that the permittee is certifying as having no exposure 011
3. Total no exposure drainage area draining to requested Outlet in acres 45.5

We will process your personal information (email address, mailing address and/or telephone number) in accordance with the State of West Virginia's Privacy Policy for appropriate and customary business purposes. Your personal information may be disclosed to other State agencies or third parties in the normal course of business or as needed to comply with statutory or regulatory requirements, including Freedom of Information Act requests. The Division of Water and Waste Management will appropriately secure your personal information. If you have any questions about our use of your personal information, please contact the DEP's Chief Privacy officer at depprivacyofficer@wv.gov.

B. (Continued)

4. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? No

b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion, however, the WVDEP Division of Water and Waste Management may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage. N/A

Less than one acre _____ One to five acres _____ More than five acres _____

C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate column.) If you answer "Yes" to any of these questions (1) through (11) you are not eligible for the no exposure exclusion.

| | Yes | No |
|--|-------|----------|
| 1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water | _____ | <u>X</u> |
| 2. Materials or residuals on the ground or in storm water inlets from spills/leaks | _____ | <u>X</u> |
| 3. Materials or products from past industrial activity | _____ | <u>X</u> |
| 4. Material handling equipment (except adequately maintained vehicles) | _____ | <u>X</u> |
| 5. Materials or products during loading/unloading or transporting activities | _____ | <u>X</u> |
| 6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants) | _____ | <u>X</u> |
| 7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers | _____ | <u>X</u> |
| 8. Materials or products handled/stored on roads or railways owned or maintained by the discharger | _____ | <u>X</u> |
| 9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters]) | _____ | <u>X</u> |
| 10. Application or disposal of process wastewater (unless otherwise permitted) | _____ | <u>X</u> |
| 11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e. under an air quality control permit) and evident in the storm water outflow | _____ | <u>X</u> |

D. Certification Statement

I certify under penalty of law that I have read and understood the eligibility requirements of claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water monitoring.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the Division of Water and Waste Management and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Division of Water and Waste Management, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

See attached letter dated November 14, 2013 for more details.

Print Name: James E. Graf
 Print Title: Director, Harrison Power Station
 Signature: [Handwritten Signature]
 Date: 1/13/2014

Please See Instructions Before Completing This Form

NPDES
FORM



**NO EXPOSURE CERTIFICATION for Exclusion from
Storm Water Monitoring in an Individual NPDES Permit**

Submission of this No Exposure Certification constitutes notice that the entity identified in Section A does not require monitoring for a specific storm water discharge in the State of West Virginia due to the existence of a condition of no exposure.

A condition of no exposure exists at an industrial facility when all industrial materials and activities are protected by a storm resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. Industrial materials or activities include, but are not limited to, material handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products. Material handling activities include the storage, loading and unloading, transportation, or conveyance of any raw material, intermediate product, final product or waste product. A storm resistant shelter is not required for the following industrial materials and activities:

- drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves;
- adequately maintained vehicles used in material handling; and
- final products, other than products that would be mobilized in storm water discharges (e.g., rock salt).

A No Exposure Certification must be provided for each Outlet qualifying for the no exposure exclusion. If any industrial activities or materials are or will be exposed to precipitation for a particular outlet, the facility is not eligible for the no exposure exclusion for that outlet.

By signing and submitting this No Exposure Certification form, the entity in Section A is certifying that a condition of no exposure exists at this facility or site, and is obligated to comply with terms and conditions of 40 CFR 122.26(g).

ALL INFORMATION MUST BE PROVIDED ON THIS FORM.

Detailed instructions for completing this form and obtaining the no exposure exclusion are provided on pages 3, 4, and 5.

A. Facility Owner

Monongahela Power Co.- Harrison Power Station
Name: Charles E. Jones, President Phone: (330) 761 - 7775 Email Address: jonesc@firstenergycorp.com

Address: 76 South Main Street

City: Akron State: OH ZIP Code: 44308

Facility Operator (If applicable)

James E. Graf, Director
Name: Harrison Power Station Phone: (304) 584 - 2233 Email Address: jgraf@firstenergycorp.com

Address: PO Box 600

City: Haywood State: WV Zip Code: 26366-0600

B. Facility/Site Location Information

Name: James E. Graf, Director - Harrison Power Station

Address: PO Box 600 City: Haywood

ZIP Code: 26366-0600

County: Harrison Is a Topographic Map with the Outlet Location Enclosed? Yes

Latitude: N 39.38349. Longitude: W 080.32223

B (Continued)

1. Please list your Individual WV/NPDES Permit No. WV0006339
2. Please list the Outlet that the permittee is certifying as having no exposure. 014
3. Total no exposure drainage area draining to requested Outlet in acres 4.5

We will process your personal information (email address, mailing address and/or telephone number) in accordance with the State of West Virginia's Privacy Policy for appropriate and customary business purposes. Your personal information may be disclosed to other State agencies or third parties in the normal course of business or as needed to comply with statutory or regulatory requirements, including Freedom of Information Act requests. The Division of Water and Waste Management will appropriately secure your personal information. If you have any questions about our use of your personal information, please contact the DEP's Chief Privacy officer at depprivacyofficer@wv.gov.

B. (Continued)

4. a. Have you paved or roofed over a formerly exposed, pervious area in order to qualify for the no exposure exclusion? No

b. If yes, please indicate approximately how much area was paved or roofed over. Completing this question does not disqualify you for the no exposure exclusion, however, the WVDEP Division of Water and Waste Management may use this information in considering whether storm water discharges from your site are likely to have an adverse impact on water quality, in which case you could be required to obtain permit coverage. N/A

Less than one acre _____ One to five acres _____ More than five acres _____

C. Exposure Checklist

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future? (Please check either "Yes" or "No" in the appropriate column.) If you answer "Yes" to any of these questions (1) through (11) you are not eligible for the no exposure exclusion.

| | Yes | No |
|--|-------|----------|
| 1. Using, storing or cleaning industrial machinery or equipment, and areas where residuals from using, storing or cleaning industrial machinery or equipment remain and are exposed to storm water | _____ | <u>X</u> |
| 2. Materials or residuals on the ground or in storm water inlets from spills/leaks | _____ | <u>X</u> |
| 3. Materials or products from past industrial activity | _____ | <u>X</u> |
| 4. Material handling equipment (except adequately maintained vehicles) | _____ | <u>X</u> |
| 5. Materials or products during loading/unloading or transporting activities | _____ | <u>X</u> |
| 6. Materials or products stored outdoors (except final products intended for outside use [e.g., new cars] where exposure to storm water does not result in the discharge of pollutants) | _____ | <u>X</u> |
| 7. Materials contained in open, deteriorated or leaking storage drums, barrels, tanks, and similar containers | _____ | <u>X</u> |
| 8. Materials or products handled/stored on roads or railways owned or maintained by the discharger | _____ | <u>X</u> |
| 9. Waste material (except waste in covered, non-leaking containers [e.g., dumpsters]) | _____ | <u>X</u> |
| 10. Application or disposal of process wastewater (unless otherwise permitted) | _____ | <u>X</u> |
| 11. Particulate matter or visible deposits of residuals from roof stacks and/or vents not otherwise regulated (i.e. under an air quality control permit) and evident in the storm water outflow | _____ | <u>X</u> |

D. Certification Statement

I certify under penalty of law that I have read and understood the eligibility requirements of claiming a condition of "no exposure" and obtaining an exclusion from NPDES storm water monitoring.

I certify under penalty of law that there are no discharges of storm water contaminated by exposure to industrial activities or materials from the industrial facility or site identified in this document (except as allowed under 40 CFR 122.26(g)(2)).

I understand that I am obligated to submit a no exposure certification form once every five years to the Division of Water and Waste Management and, if requested, to the operator of the local municipal separate storm sewer system (MS4) into which the facility discharges (where applicable). I understand that I must allow the Division of Water and Waste Management, or MS4 operator where the discharge is into the local MS4, to perform inspections to confirm the condition of no exposure and to make such inspection reports publicly available upon request. I understand that I must obtain coverage under an NPDES permit prior to any point source discharge of storm water from the facility.

Additionally, I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is to the best of my knowledge and belief true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Print Name James E. Graf
 Print Title Director, Harrison Power Station
 Signature: [Signature]
 Date 1/13/2014

Devereux, Lori K

From: Sweeney, Matthew L
Sent: Monday, February 24, 2014 11:51 AM
To: Devereux, Lori K
Subject: Fwd: Allegheny Energy Supply - Harrison Power Station Draft Permit **Modification** (WV0005339)

EPA approval

Begin forwarded message:

From: "Walker, Dana" <Walker.Dana@epa.gov>
Date: February 24, 2014 at 11:45:52 AM EST
To: "Sweeney, Matthew L" <Matthew.L.Sweeney@wv.gov>
Subject: RE: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

Matt,

I have no additional comments on this draft permit.

Thanks,
Dana

Dana Walker
NPDES Permits Branch (3WP41)
Water Protection Division
US EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.2928
Email: walker.dana@epa.gov

From: Sweeney, Matthew L [<mailto:Matthew.L.Sweeney@wv.gov>]
Sent: Wednesday, February 12, 2014 1:38 PM
To: Walker, Dana
Subject: RE: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

Dana,

Please find the no exposure forms attached for this facility. The facility filled out the form and returned it to the agency. Please see the attached forms for the two specific outfalls that do not have industrial activity.

Please let me know if this satisfies EPA's comments.

Thanks,
Matt Sweeney, P.E.
NPDES Individual Permitting Supervisor

WV Department of Environmental Protection
Division of Water and Waste Management
601 57th Street, SE
Charleston, WV 25304
(304) 926-0495

From: Walker, Dana [<mailto:Walker.Dana@epa.gov>]
Sent: Monday, December 09, 2013 2:32 PM
To: Sweeney, Matthew L
Subject: RE: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

Hi Matt,

As explained in my earlier email to you today (regarding the Graftech International Holdings permit), as long as the no exposure certification you received from the facility meets the requirements of 40 CFR 122.26(g)(4), then I have no further comments on the draft permit.

Dana

Dana Walker
NPDES Permits Branch (3WP41)
Water Protection Division
US EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.2928
Email: walker.dana@epa.gov

From: Sweeney, Matthew L [<mailto:Matthew.L.Sweeney@wv.gov>]
Sent: Friday, December 06, 2013 3:50 PM
To: Walker, Dana
Subject: RE: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

Dana,

We have received a written no exposure certification from the facility that the drainage areas are not associated with industrial activity.

Please note that the purpose of this modification was to separate storm water associated with industrial activity from storm water unassociated with industrial activity at existing Outlet 011. This was confirmed by agency personnel during a site visit. Outlet 014 was a previously unpermitted outfall that was discovered during that site visit. This new outlet was also confirmed to be draining an area unassociated with industrial activity.

Please let us know if this addresses EPA's comments.

Thanks,
Matt Sweeney, P.E.
NPDES Individual Permitting Supervisor
WV Department of Environmental Protection
Division of Water and Waste Management

601 57th Street, SE
Charleston, WV 25304
(304) 926-0495

From: Walker, Dana [<mailto:Walker.Dana@epa.gov>]
Sent: Monday, September 30, 2013 3:45 PM
To: Sweeney, Matthew L
Cc: Patel, Yogesh P; Trulear, Brian
Subject: Allegheny Energy Supply - Harrison Power Station Draft Permit Modification (WV0005339)

Matt,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) **Region III** has received the draft National Pollutant Discharge Elimination System (NPDES) permit modification for:

Allegheny Energy Supply – Harrison Power Station
NPDES Number: WV0005339
EPA Received: September 4, 2013

This is a major permit that is being modified to address changes to the facility's stormwater areas. Therefore, I have performed a limited review based on the proposed changes. I have **completed** my review and offer the following comment:

1. Please clarify whether a No Exposure Certification was provided by the facility for Outlets **011** and **014** in accordance with 40 CFR 122.26(g)(1), and including the information required at 40 CFR 122.26(g)(4).

Please address the above and provide me with any changes to the draft permit and/or **Fact Sheet**, if necessary. Any questions, give me a call.

Thank you,
Dana

Dana Walker
NPDES Permits Branch (3WP41)
Water Protection Division
US EPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
Phone: 215.814.2928
Email: walker.dana@epa.gov



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, West Virginia 25304-2345
Phone: 304-926-0495
Fax: 304-926-0496

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

April 08, 2014

ENVIRONMENTAL DEPARTMENT
MONONGAHELA POWER COMPANY
800 CABIN HILL DR
GREENSBURG, PA 15601

91 7199 9991 7030 8732 2699

CERTIFIED RETURN RECEIPT REQUESTED

Dear Permittee:

Enclosed please find WV/NPDES Permit Number WV0005339 dated April 08, 2014.

In response to correspondence, dated the 3rd day of October 2013, presenting comments on the **draft WV/NPDES Water Pollution Control Permit modification**, the agency provides the following responses.

Comment No. 1 : Limitations at Outlets 012 and 013

As part of the 2011 permit, historical exceedances of benchmarks led to the agency determining reasonable potential (RP) to exceed water quality and limits were imposed at Outfall 011 for aluminum and zinc. Order #7004 was issued in 2011 and required submission of a corrective action plan to identify the causes of the exceedances of benchmarks and to address the exceedances. The permittee has proposed to segregate the storm water associated with industrial activity from the storm water that is in no exposure areas (no area of industrial activity). The permittee will segregate the majority of the contaminated storm water associated with industrial activity and route this wastewater through a series of two ponds with discharge through new Outlet 012. All remaining contaminated storm water associated with industrial activity will be routed through a separate pond for treatment and discharge through new Outlet 013. No exposure storm water will continue to be discharged through existing Outlet 011. This modification serves as the permittee's means of compliance to address high pollutant levels in storm water and to achieve the requirements within the permit. The permittee has taken all storm water previously discharged through Outlet 011 and segregated the areas exposed to industrial activity and routed them through ponds and out newly designated outfall locations (Outlets 012 and 013). The determination of the need for effluent limits at Outlet 011 already occurred as part of the last reissuance. Future monitoring with these limits imposed at Outlets 012 and 013 will determine the efficacy of the permittee's compliance solution. As such, the prior monitoring requirements and limits from Outlet 011 are imposed at new Outlets 012 and 013. Please note that continued monitoring can be used to reassess RP in the future at Outlets 012 and 013. If a finding of no RP can be determined in the future, the agency would remove the limitations and return to benchmarks.

Comment No. 2 : Aluminum Translator

ENVIRONMENTAL DEPARTMENT

Page 2

April 08, 2014

The pending modification for the aluminum translator has been placed on hold pending the resolution of Appeal No. 11-21-EQB since the Appeal directly impacts aluminum limitations.

Comment No. 3 : Revised Page 2

The agency has included a revised Page 2 with the final modification that reflects the change in **outlets**.

Comment No. 4 : Section C Conditions

The agency concurs that only the Section C conditions specifically revised and identified in this **permit** modification are what are being considered for this modification. Only the conditions revised and **identified** in the modification shall supersede the previous respective Section C conditions. For simplicity, **the** agency is included a full Section C as an attachment to reflect those conditions that did change as well as **all** other unchanged conditions.

Comment No. 5 : eDMR Concerns

Monitoring periods in WV/NPDES permits are determined based on EPA's ICIS tracking system. **Quarterly** monitoring periods are based on a calendar year regardless of the effective date of a reissued **permit**. Semi-annual and annual monitoring periods are determined from the effective date of the permit. **Therefore**, if a reissued permit has an effective date of May 1, 2014, then the semi-annual monitoring periods **would** be from May 1st - October 31st and November 1st - April 30th while an annual monitoring period **would** be from May 1st - April 30th. This is specifically determined by EPA's ICIS tracking system. The **WVDEP** does not alter the effective dates for monitoring of outfalls for the rationale of aligning monitoring requirements. The agency could easily simplify monitoring by making all requirements either **monthly** or quarterly; however, the agency provides the benefit of semi-annual and annual monitoring where **deemed** appropriate in order to reduce overall monitoring requirements.

Comment No. 6 : Ownership Transfer

The final modification is reflective of the change in ownership.

Please note that a Discharge Monitoring Report (DMR) is to be completed and submitted to this **Division** each quarter.

Finally note that copies of all future correspondence regarding the permit must be forwarded to the **Field** Inspector and Field Supervisor at the following address:

Department of Environmental Protection
Environmental Enforcement
2031 Pleasant Valley Road
Fairmont, WV 26554

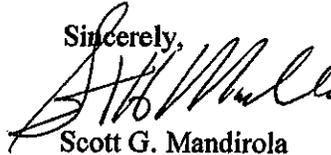
ENVIRONMENTAL DEPARTMENT

Page 3

April 08, 2014

If you have any questions, please contact Ryan McGlothen, P.E. of this Division at (304) 926-0499 at extension 1092.

Sincerely,



Scott G. Mandirola
Director

SGM:rkm

Enclosures



west virginia department of environmental protection

Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
Phone: (304) 926-0495
Fax: (304) 926-0463

Earl Ray Tomblin, Governor
Randy C. Huffman, Cabinet Secretary
www.dep.wv.gov

April 8, 2014

Mr. James E. Graf, Director
Monongahela Power Co.
Harrison Power Station
P.O. Box 600
Haywood, WV 26366

91 7199 9991 7030 8732 2705

CERTIFIED RETURN RECEIPT REQUESTED

Re: WV/NPDES Permit Modification
WV0005339-C, Harrison County

Dear Mr. Graf:

This correspondence shall serve as Modification No. 3 of your existing WV/NPDES Water Pollution Control Permit No. WV0005339 issued the 4th day of June 2011.

After review and consideration of the information accompanying WV/NPDES Water Pollution Control Permit No. WV0005339, and after consideration of the information submitted on, and with Permit Modification Application No. WV0005339-C, dated the 31st day of January 2013 and other relevant information, the subject Permit is hereby modified to incorporate the following:

1. The permittee may acquire, construct, install, operate and maintain upgrades to the facility's storm water collection, treatment, and disposal systems. The upgrades are generally described as follows and include:
 - a. Approximately 45 acres of existing Outlet 011 forested upland storm water area designated as No Exposure Certification (NEC) that will continue to discharge through the existing Outfall 011 structure. This area will be segregated from storm water associated with industrial activity, and monitoring requirements for existing Outlet 011 have been eliminated. Section C.26 has been added to the permit to address future potential changes to land uses within the area currently designated as NEC. Section A.011 is hereby deleted from the permit.

Promoting a healthy environment.

- b. Construction of two (2) new sediment basins located just south of the helicopter pad between two existing paved drives. The two basins are constructed in series with a 36-inch diameter pipe with the west basin draining into the east. A new outlet structure with a 48-inch diameter discharge pipe will serve as new Outlet 012. New Outlet 012 will discharge into the NEC water trench for ultimate discharge through existing Outlet 011.
 - c. A new sediment basin has been constructed south of the two wastewater lagoons, near the discharge of existing Outlet 011. The new sediment basin discharges through new Outlet 013 (identified as proposed Outlet 011A in the modification application) to the West Fork River. New storm sewer lines located to the north and west of the proposed Outlet 013 sediment basin include approximately 2,200 linear feet of 8-inch, 12-inch, and 15-inch pipe, improved ditching and associated catch basin, manholes, and headwalls.
 - d. During a July 1, 2013 site visit by WVDEP at the facility, a storm water pipe was discovered discharging which was not previously included in the facilities NPDES permit. The pipe is located just north of the existing Outlet 011 and new Outlet 013 locations. The discharge from the pipe consists of non-industrial storm water runoff from the area just west of the existing wastewater treatment lagoon. This discharge is designated as new Outlet 014. No monitoring requirements are being imposed on the new outlet. Section C.26 has been added to the permit to address future potential changes to land uses within the area currently designated as NEC.
2. As a result of these revisions, Section A.012 and Section A.013 are being incorporated into the permit. Monitoring requirements and limitations are the same as what was previously imposed at Outlet 011. This has also resulted in revisions to storm water requirements in Section C.13 of the permit.
 3. Also, please note that Section C.17.c has been revised to be consistent with updated certification requirements.

Please find attached revised Page No. 2 of 56, revised Page Nos. 41 and 42 of 56 which incorporates Section A.012, revised Page Nos. 43 and 44 of 56 which incorporates Section A.013, and revised Page Nos. 49 - 53 of 56 with revised Section C – Other Requirements, and new DMRs for Outlets 012 and Outlet 013. These documents shall supersede the ones currently in your possession and should be incorporated, as appropriate, into your existing WV/NPDES Water Pollution Control Permit.

This Modification in no way relieves the permittee of its obligation to comply with all terms and conditions of its WV/NPDES Permit No. WV0005339 and shall not constitute an affirmative defense in any enforcement action brought against the permittee.

Allegheny Energy Supply Co.
Harrison Power Station
Modification No. 1
Page 3 of 3

All other terms and conditions of the subject WV/NPDES Water Pollution Control Permit No. WV0001112 shall remain in effect and unchanged. Should you have any questions, please contact Mr. Ryan K. McGlothen, P.E. of this office at 304-926-0499 extension 1092.

Sincerely,



Scott G. Mandirola
Director

SGM:rkm

cc: EE Supervisor
EE Inspector
USEPA Region 3

| Inspectable Unit | Latitude | Longitude | Receiving Stream | Dist. to Stream Mouth (in Mile) | Milepost |
|------------------|-----------|-----------|--|---------------------------------|----------|
| 001 | 39°23'15" | 80°19'20" | WEST FORK RV | 16.5 | N/A |
| 002 | 39°23'03" | 80°19'19" | WEST FORK RV | 16.26 | N/A |
| 003 | 39°23'14" | 80°19'57" | WEST FORK RV -- No Monitoring Required | 17.07 | N/A |
| 006 | 39°23'04" | 80°20'15" | WEST FORK RV | 17.43 | N/A |
| 007 | 39°23'08" | 80°20'09" | WEST FORK RV | 17.3 | N/A |
| 008 | 39°23'12" | 80°20'00" | WEST FORK RV | 17.11 | N/A |
| 009 | 39°23'15" | 80°19'49" | WEST FORK RV | 17.01 | N/A |
| 010 | 39°23'17" | 80°19'36" | WEST FORK RV | 16.87 | N/A |
| 011 | 39°22'53" | 80°19'09" | WEST FORK RV -- No Monitoring Required | 16.07 | N/A |
| 012 | 39°23'00" | 80°19'45" | WEST FORK RV | 16.07 | N/A |
| 013 | 39°22'53" | 80°19'09" | WEST FORK RV | 16.07 | N/A |
| 014 | 39°22'53" | 80°19'09" | WEST FORK RV -- No Monitoring Required | 16.07 | N/A |
| 101 | 39°23'15" | 80°19'20" | N/A | 16.38 | N/A |
| 102 | 39°23'15" | 80°19'20" | N/A | 16.38 | N/A |
| INT | 39°23'15" | 80°19'20" | WEST FORK RV | 17.07 | N/A |

A.012 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning 4/8/2014 and lasting through midnight 6/30/2015 the permittee is authorized to discharge from Outlet Number(s) 012 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | | | |
|--|------------------------------|-----|--------------|------------------------|--------------------------------|------------------------------|--------------------|------------|-----------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | | |
| 50050 - (Flow, in Conduit or thru plant) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mgd | 1/quarter | Estimated |
| 00530 - (Total Suspended Solids) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/quarter | Grab |
| 00400 - (pH) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | S.U. | 1/6 months | Grab |
| 01119 - (Copper, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 01094 - (Zinc, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 71900 - (Mercury, Total (as Hg)) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | ug/l | 1/6 months | Grab |
| 01104 - (Aluminum, Total Recoverable) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | mg/l | 1/quarter | Grab |

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 012 - At the discharge from the two sediment ponds in series prior to discharge to the non-industrial stormwater runoff ditch to Outlet 011.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

A.012 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning 4/8/2014 and lasting through midnight 6/30/2015 the permittee is authorized to discharge from Outlet Number(s) 012 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | | | |
|---|------------------------------|-----|--------------|--------------------|--------------------------------|------------------------------|--------------------|------------|------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | | |
| 00980 - (Iron, Total Recoverable) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | mg/l | 1/quarter | Grab |
| 00981 - (Selenium, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 00978 - (Arsenic, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 70295 - (Solids, Total Dissolved (TDS)) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 81020 - (Sulfate) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 01059 - (Thallium, Total (as Tl)) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 01220 - (Chromium, Hex. Diss.) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 012 - At the discharge from the two sediment ponds in series prior to discharge to the non-industrial stormwater runoff ditch to Outlet 011.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

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A.013 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning 4/8/2014 and lasting through midnight 6/30/2015 the permittee is authorized to discharge from Outlet Number(s) 013 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | | | |
|--|------------------------------|-----|--------------|------------------------|--------------------------------|------------------------------|--------------------|------------|-----------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | | |
| 50050 - (Flow, in Conduit or thru plant) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mgd | 1/quarter | Estimated |
| 00530 - (Total Suspended Solids) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/quarter | Grab |
| 00400 - (pH) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | S.U. | 1/6 months | Grab |
| 01119 - (Copper, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 01094 - (Zinc, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 71900 - (Mercury, Total (as Hg)) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | ug/l | 1/6 months | Grab |
| 01104 - (Aluminum, Total Recoverable) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | mg/l | 1/quarter | Grab |

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Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 013 - At the discharge from the single sediment pond prior to discharge to the West Fork River via an open channel.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

A.013 DISCHARGE LIMITATIONS AND MONITORING REQUIREMENTS:

Final Limitations

During the period beginning 4/8/2014 and lasting through midnight 6/30/2015 the permittee is authorized to discharge from Outlet Number(s) 013 (Storm Water Runoff)

Such discharges shall be limited and monitored by the permittee as specified below:

| <u>Effluent Characteristic</u> | <u>Discharge Limitations</u> | | | | <u>Monitoring Requirements</u> | | | | |
|---|------------------------------|-----|--------------|--------------------|--------------------------------|------------------------------|--------------------|------------|------|
| | <u>Quantity</u> | | <u>Units</u> | <u>Other Units</u> | <u>Units</u> | <u>Measurement Frequency</u> | <u>Sample Type</u> | | |
| 00980 - (Iron, Total Recoverable) (Year Round) (ML-1) (RF-B) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | mg/l | 1/quarter | Grab |
| 00981 - (Selenium, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 00978 - (Arsenic, Total Recoverable) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 70295 - (Solids, Total Dissolved (TDS)) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 81020 - (Sulfate) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 01059 - (Thallium, Total (as Tl)) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |
| 01220 - (Chromium, Hex. Diss.) (Year Round) (ML-1) (RF-C) | N/A | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | mg/l | 1/6 months | Grab |

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Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

Outlet 013 - At the discharge from the single sediment pond prior to discharge to the West Fork River via an open channel.

This discharge shall not cause violation of Title 47, Series 2, Section 3, of the West Virginia Legislative Rules issued pursuant to Chapter 22B, Article 3.

Section C - Other Requirements

01. The permittee shall practice good housekeeping including maintaining the facility grounds. There shall be no scattered parts, equipment, debris, etc. Any and all drums shall be either stored in a covered area or kept upon pallets and properly sealed.
02. The issuance of this permit shall not relieve the permittee of the obligation to comply with any other federal, state or local laws. Compliance with this permit does not relieve the permittee from the obligation of Section 311 of the Clean Water Act. This permit does not authorize spills of hazardous substances/wastes from any permitted outlet into waters of the State. Such incidents are to be reported in accordance with Sections IV.1 and IV.2 of Appendix A of this permit.
03. Upon review of information submitted under terms and conditions of this permit, the permit may be modified to require additional effluent limitations/monitoring requirements and/or improved best management practices.
04. The permittee shall notify the Division of Water and Waste Management immediately when it becomes aware of any migration of any pollutant from any unpermitted source (such as contaminated groundwater and/or storm water) into surface waters of the State.
05. Without prior approval from the agency, the permittee shall not accept and treat wastewater from any other facility.
06. The permittee shall submit each month according to the enclosed format, a Discharge Monitoring Report (DMR) indicating in terms of concentration and/or quantities the values of the constituents listed in Section A analytically determined to be in the plant effluent(s). Additional information pertaining to effluent monitoring and reporting can be found in Section III of Appendix A.
07. The required DMRs shall be received by the agency no later than 20 days following the end of the reporting period in accordance with the following requirements. The agency encourages the permittee to utilize our electronic discharge monitoring report (eDMR) system. If the permittee uses the eDMR system, the permittee is not required to submit hard copies of the DMRs to the addresses listed below. However, if the permittee elects to not use the eDMR system, then the permittee is required to send hard copies to the addresses below. The permittee may contact the agency for more information about the eDMR system. Regardless, in accordance with Appendix A, Section III.6 of this permit, the permittee shall maintain copies of DMRs (either hard copies or electronic copies) at the plant site and the DMRs shall be made readily available upon request from DEP personnel.
 - a.

| | |
|---|--|
| Director Division of Water and Waste Management 601 57th Street, SE Charleston, West Virginia 25304 Attn: Permitting Branch | U. S. Environmental Protection Agency Region III, Water Protection Division NPDES Enforcement Branch (3WP42) 1650 Arch Street Philadelphia, PA 19103 |
|---|--|
08. The permittee shall not use alternate DMRs without prior approval from this Agency.
09. Any "not detected (ND)" results by the permittee must be "ND" at the method detection limit (MDL) for the test method used for that parameter and must be reported as less than the MDL used. The permittee may not report the result as zero, "ND", or report the result as less than a minimum level (ML), reporting limit (RL), or practical quantitation limit (PQL).

When averaging values of analytical results for DMR reporting purposes for monthly averages, the permittee should use actual analytical results when these results are greater than or equal to the MDL and should use zero (0) when these results are less than the MDL. If all analytical results are non-detect at the MDL (<MDL), then the permittee should use the actual MDL in the calculation for averaging and report the result as less than the average calculation.

Section C - Other Requirements

10. In incidences where a specific test method is not defined, the permittee shall utilize an EPA approved method with a method detection limit (MDL) sensitive enough to confirm compliance with the permit effluent limit for that parameter. If a MDL is not sensitive enough to confirm compliance, the most sensitive approved method must be used. If a more sensitive EPA approved method becomes available, that method shall be used. Should the current and/or new method not be sensitive enough to confirm compliance with the permitted effluent limit, analytical results reported as "not detected" at the MDL of the most sensitive method available will be deemed compliant for purposes of permit compliance. Results shall be reported on the Discharge Monitoring Reports as a numeric value less than the MDL.
11. The Groundwater Protection Plan (GPP) shall be maintained at the plant site and shall be available for inspection by the Division of Water and Waste Management personnel.
12. The permittee shall maintain and implement the storm water pollution prevention plan (SWPPP) for the site. The SWPPP shall be prepared in accordance with good engineering practices. The SWPPP shall identify potential sources of pollution which may reasonably be expected to affect the quality of storm water discharges associated with the industrial activity. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with the industrial activity at the facility and to assure compliance with the terms and conditions of this permit. A copy of this document shall be retained at the site for review upon request.
13. The following storm water requirements apply to Outlet(s) 006, 007, 008, 009, 010, 012, and 013:

- a. Samples shall be collected from the discharge resulting from a storm event that is greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable (greater than 0.1 inch rainfall) storm event. Samples shall be taken during the first thirty (30) minutes, or as soon thereafter as practicable, of the storm event.
- b. Each outlet shall be monitored separately.

c.

| Pollutant | Benchmark Value |
|------------------------|-----------------|
| Total Suspended Solids | 100 mg/l |
| pH | 6.0 to 9.0 S.U. |
| Total Copper | 0.0636 mg/l |
| Total Zinc | 0.117 mg/l |
| Total Aluminum | 0.75 mg/l |
| Total Selenium | 0.005 mg/l |
| Total Iron | 1.0 mg/l |
| Total Arsenic | 0.16954 mg/l |
| Total Mercury | 0.0014 mg/l |
| Total Thallium | 0.14 mg/l |
| Hexavalent Chromium | 0.016 mg/l |
| Total Dissolved Solids | 735 mg/l |
| Sulfate | 500 mg/l |

When the concentration results from a minimum of four consecutive samples of a pollutant are all less than the corresponding benchmark value for the pollutant, additional monitoring for the pollutant is not required (all pH values of the samples must be within the range 6.0 to 9.0 S.U.). The facility shall submit, each year, to the Division of Water and Waste Management, in lieu of the monitoring data, a certification (form will be provided upon request) that there has not been a significant change in the industrial activity or the pollution prevention measures in the area of the facility that drains to the outlet for which sampling is to be waived. If the concentration of a pollutant exceeds the corresponding benchmark concentration or a pH value is not within the range of 6.0 to 9.0 S.U., monitoring shall be continued and storm water pollution prevention practices shall be revised and implemented. A letter stating the revised and implemented storm water pollution prevention practices shall be submitted to the Division of Water and Waste Management at the address listed in Section C.07. These requirements do not apply to pollutants with effluent limitations.

14. If there is evidence indicating potential or realized impacts on water quality due to any storm water discharge associated with industrial activity covered by this permit, the permit may be promptly modified and/or reissued to include effluent limitations and/or other requirements to control such storm water discharges.
15. The permittee shall perform quarterly chronic toxicity tests as described below, on the effluent from Outlet 001 & 002:

Section C - Other Requirements

15. a. Such testing will determine if an appropriate dilute effluent sample affects the survival or reproduction of the test species. A 24-hr flow weighted composite samples of the effluent, as prescribed in Section A, shall be collected for testing. An appropriate statistical test shall be used to determine whether differences in control and effluent data are significant.
- i) The permittee shall conduct a three brood (6-8 days) Ceriodaphnia Dubia survival and reproduction toxicity test on the final effluent diluted by appropriate control water. Toxicity will be demonstrated if there is a statistically significant difference at the 95 percent confident level in survival of reproduction between Ceriodaphnia Dubia exposed to an appropriate control water and the final effluent. All test solutions shall be renewed using an approved renewal schedule. If, in any control, more than 20% of the test organisms die, or less than 60% of surviving females in controls produced their third brood, that test shall be repeated.
 - ii) The permittee shall conduct a 7-day Pimephales Promelas fathead minnow larval survival and growth toxicity test on the final effluent diluted by appropriate control water. Toxicity will be demonstrated if there is a statistically significant difference at the 95 percent confidence level in survival or growth between fathead minnows exposed to an appropriate control water and the final effluent. All test solutions shall be renewed using an approved renewal schedule. If, in any control, more than 20% of the test organisms die, or average dry weight of surviving controls was less than 0.25 mg/l that test shall be repeated.
- b. Results shall be reported in terms of chronic toxic units (TUC) and shall be submitted with the corresponding monthly Discharge Monitoring Report (DMR).

$TUC = 100/NOEC$ or $NOEL$

Where NOEC (or NOEL) is No Observed Effect Concentration (or Level), which is expressed as percent (volume) effluent in dilution water.

For Example, if NOEC is 10%, $TUC = 100/10 = 10$

When the effluent demonstrates no toxicity at 100% effluent (no observed effect), the permittee may report zero TUC.

- c. The monitoring required, herein, shall be conducted in accordance with the sample collection, preservation, and analytical procedures specified in 40 CFR 136.
- d. In addition to the monitoring data reporting requirements of 40 CFR 136, the exact age of the test organisms at the initiation of the test shall be reported. Values of less than or equal to 24 hours are acceptable for Pimephales Promelas, fathead minnow. The range of the Ceriodaphnia Dubia used must be reported as a range in hours. All Ceriodaphnia Dubia used in the test must be less than 24 hours of age at test commencement. The age difference between the youngest and oldest Ceriodaphnia Dubia used in the test must not exceed eight (8) hours.
- e. The chronic toxicity testing shall be performed on a quarterly basis. There shall be a minimum of one (1) month between sampling events.
- f. If chronic effluent toxicity testing results in a value exceeding 1.9 TUC at Outlet or 1.66 TUC at Outlet 002, the permittee shall immediately resample and test the effluent. This shall be performed within 30 days of the initial demonstration of the aforementioned exceedance. Copies of the retesting results shall be provided to the Director immediately upon completion of the test.

If the second test results in a value less than or equal 1.9 TUC at Outlet or 1.66 TUC at Outlet 002, chronic effluent toxicity testing shall continue in accordance with the requirements, as prescribed herein. However, if the second test also shows an exceedance, the Director shall impose further requirements, as may be necessary.

- g. The Director may impose further requirements should the chronic effluent toxicity testing results demonstrate toxicity.

16. Effluent monitoring for the following pollutants shall be conducted using the most sensitive methods and detection levels commercially available and economically feasible.

Section C - Other Requirements

16. a. The following methods are to be used unless the permittee desires to use an EPA Approved Test Method with a listed lower method detection level. Regardless, it is recognized that detection levels can vary from analysis to analysis and that non-detect results at a different MDL for the specified test method would not constitute a permit violation.

| Parameter | EPA Method No. | Method Detection Level (ug/l) |
|------------------------------|----------------|-------------------------------|
| Thallium, Total Recoverable | 200.8 | 0.3 |
| Beryllium, Total Recoverable | 200.9 | 0.02 |
| Mercury, Total* | 245.7 | 0.0018 |
| Mercury, Total* | 1631 | 0.0002 |

*The permittee may use either Method 245.7 or Method 1631 for the analysis of mercury.

- b. The permittee may utilize the following test methods for the following pollutants so long as the laboratory achieves the MDLs listed below and reports any non-detect values down to the listed MDL.

| Parameter | EPA Method No. | Method Detection Level (ug/l) |
|-----------------------------|----------------|-------------------------------|
| Copper, Total Recoverable | 200.7 | 1.0 |
| Lead, Total Recoverable | 200.7 | 1.0 |
| Zinc, Total Recoverable | 200.7 | 4.0 |
| Nickel, Total Recoverable | 200.7 | 3.0 |
| Arsenic, Total | 200.7 | 2.0 |
| Barium, Total Recoverable | 200.7 | 10.0 |
| Antimony, Total Recoverable | 200.7 | 1.0 |
| Selenium, Total Recoverable | 200.7 | 2.0 |
| Aluminum, Total Recoverable | 200.7 | 20.0 |
| Chromium, Hexavalent | SM3500CrB | 2.0 |

- c. The analytical test procedures, set forth in 40 CFR Part 136, prescribe colorimetric methods for certain parameters. The digestion process for the performance of total recoverable is not sufficient for the utilization of a colorimetric procedure. Therefore, colorimetric procedures shall not be acceptable for the analysis of parameters prescribed as total recoverable.

17. The following conditions apply only to the package sewage treatment plant:

- The herein described treatment works, structures, electrical, and mechanical equipment shall be adequately protected from physical damage by the maximum expected twenty-five (25) year flood level, and operability shall be maintained during the ten (10) year flood level.
- The entire sewage treatment facility shall be adequately protected by fencing.
- Continuous maintenance and operation of the listed sewage treatment facility shall be performed by, or supervised by, a certified operator possessing at least a Class S certificate, for Waste Water Treatment Plant Operators, issued by the State of West Virginia.
- The permittee shall connect to a municipal or public service district sewage collection system when one becomes available; however, prior to this connection, the permittee shall obtain written permission from the municipal or public service district sewage system authority which will receive the waste and submit a request along with one (1) copy of the written permission to the Division of Water and Waste Management for approval.
- Without prior approval from the agency, use of intermediates, by-products, spent solvents or any other materials (except commercial grade materials), containing pollutant(s) that cannot be removed by the wastewater treatment plant is prohibited.

Section C - Other Requirements

18. Available sampling methods for total residual chlorine (TRC) are currently not sensitive enough to confirm compliance with the permit limitations imposed at the facility. Total residual chlorine (TRC) samples shall be taken, preserved and analyzed in accordance with the latest edition of 40 CFR Part 136. Because the permittee does not operate a certified wastewater laboratory at the plant site but still must comply with the instantaneous sample-type requirements, the permittee shall use an EPA Approved Method with at least a method detection level (MDL) of 100 ug/l. Any TRC sampling result reported as less than the MDL stated above shall be assumed to confirm compliance for purposes of permit enforcement. Should a more sensitive EPA approved method become available for field analysis of TRC, the permittee shall perform TRC self-monitoring in accordance with the new method. If the new method is not sensitive enough to determine compliance with specified TRC limits, analytical results reported as "not detected" at the MDL of the new method will be deemed compliant for purposes of permit enforcement.
19. Any overflows from the coal pile runoff control basin, which is designed to handle a 10-year 24-hour rainfall event, shall be reported in accordance with the bypass provisions contained in Appendix A of this permit.
20. There shall be no discharge of polychlorinated biphenyl compounds attributable to operations at the facility through any outfall.
21. The permittee shall dispose of any solids generated by the wastewater treatment plant(s) in conformance with Solid Waste Permit No. WV0075795.
22. Any debris collected at the intake shall not be returned to the waterway.
23. Neither free available chlorine nor total residual chlorine may be discharged from any unit for more than two hours in any one day and not more than one unit in any plant may discharge free available or total residual chlorine at any one time unless the utility can demonstrate to the Regional Administrator or State that the units in a particular location cannot operate at or below this level of chlorination as per Federal Effluent Guidelines 40 CFR 423.12.b.(8) and 40 CFR 423.13.d.(2). Simultaneous multi-unit chlorination is permitted.
24. The permittee shall use analytical test method 2540 C from the the 20th edition of Standard Methods for the analysis of total dissolved solids (TDS).
25. The temperature measurements collected to calculate the difference between the Upstream/Intake temperature and the discharge temperature required in Section A.001 and Section A.002 of this permit shall be collected concurrently. There shall be no more than thirty minutes between temperature monitoring collected at the intake and the discharges.
26. The permittee shall not make any changes pertaining to the land use including new construction, storage of new/additional materials or diversion of additional runoff within the drainage area for stormwater Outlets 011 and 014 without prior notification to the Division of Water and Waste Management.

STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) MONONGAHELA POWER COMPA

CERTIFIED LABORATORY NAME: _____

LOCATION OF FACILITY: HAYWOOD; Harrison County

CERTIFIED LABORATORY ADDRESS: _____

PERMIT NO.: WV0005339 OUTLET NO.: 012

WASTELOAD FOR THE MONTH OF: _____

INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | Reported | Quantity | | | Other Units | | | CEL* | Units | N.E. | Measurement Frequency | Sample Type |
|---|---------------|----------|-----|-------|-------------|------------------------|--------------------------|------------------------|-------|------|-----------------------|------------------------|
| | | | | Units | N.E. | | | | | | | |
| 50050 (ML-1) RF-B Flow, in Conduit or thru plant Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mgd | | 1/quarter Estimated |
| 00530 (ML-1) RF-B Total Suspended Solids Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/quarter Grab |
| 00400 (ML-1) RF-C pH Year Round | Permit Limits | N/A | N/A | | | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | N/A | S.U. | | 1/6 months Grab |
| 01119 (ML-1) RF-C Copper, Total Recoverable Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months Grab |
| 01094 (ML-1) RF-C Zinc, Total Recoverable Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months Grab |
| 71900 (ML-1) RF-C Mercury, Total (as Hg) Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | ug/l | | 1/6 months Grab |
| 01104 (ML-1) RF-B Aluminum, Total Recoverable Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | N/A | mg/l | | 1/quarter Grab |
| 00980 (ML-1) RF-B Iron, Total Recoverable Year Round | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | N/A | mg/l | | 1/quarter Grab |

* CEL = Compliance Evaluation Level

| | | |
|---|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed |
| | | Signature of Principal Executive Officer or Authorized Agent |
| Title of Officer | | |

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STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) MONONGAHELA POWER COMPA
 LOCATION OF FACILITY: HAYWOOD; Harrison County
 PERMIT NO.: WV0005339 OUTLET NO.: 012
 WASTELOAD FOR THE MONTH OF: _____

CERTIFIED LABORATORY NAME: _____
 CERTIFIED LABORATORY ADDRESS: _____
 INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | | Quantity | | | Other Units | | | CEL* | Units | N.E. | Measurement Frequency | Sample Type |
|--|---------------|----------|-----|-------|-------------|--------------------------|------------------------|------|-------|------|-----------------------|-------------|
| | | | | Units | N.E. | | | | | | | |
| 00981 (ML-1) RF-C Selenium, Total Recoverable Year Round | Reported | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 00978 (ML-1) RF-C Arsenic, Total Recoverable Year Round | Reported | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 70295 (ML-1) RF-C Solids, Total Dissolved (TDS) Year Round | Reported | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 81020 (ML-1) RF-C Sulfate Year Round | Reported | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01059 (ML-1) RF-C Thallium, Total (as Tl) Year Round | Reported | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| 01220 (ML-1) RF-C Chromium, Hex. Diss. Year Round | Reported | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab |
| | | | | | | | | N/A | | | | |
| | | | | | | | | N/A | | | | |

* CEL = Compliance Evaluation Level

| | | | |
|-------------------------------------|--|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed | |
| Title of Officer | | Signature of Principal Executive Officer or Authorized Agent | |

STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) MONONGAHELA POWER COMPA

CERTIFIED LABORATORY NAME: _____

LOCATION OF FACILITY: HAYWOOD; Harrison County

CERTIFIED LABORATORY ADDRESS: _____

PERMIT NO.: WV0005339 OUTLET NO.: 013

WASTELOAD FOR THE MONTH OF: _____

INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | | Quantity | | | | Other Units | | | | | | Measurement Frequency | Sample Type | |
|---|---------------|----------|-----|-------|------|------------------------|--------------------------|------------------------|------|-------|------|-----------------------|-------------|--|
| | | | | Units | N.E. | | | | CEL* | Units | N.E. | | | |
| 50050 (ML-1) RF-B Flow, in Conduit or thru plant Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mgd | | 1/quarter | Estimated | |
| 00530 (ML-1) RF-B Total Suspended Solids Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/quarter | Grab | |
| 00400 (ML-1) RF-C pH Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | Rpt Only Inst. Min. | N/A | Rpt Only Inst. Max. | N/A | S.U. | | 1/6 months | Grab | |
| 01119 (ML-1) RF-C Copper, Total Recoverable Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab | |
| 01094 (ML-1) RF-C Zinc, Total Recoverable Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | mg/l | | 1/6 months | Grab | |
| 71900 (ML-1) RF-C Mercury, Total (as Hg) Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | N/A | ug/l | | 1/6 months | Grab | |
| 01104 (ML-1) RF-B Aluminum, Total Recoverable Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | 0.75 Max. Daily | N/A | mg/l | | 1/quarter | Grab | |
| 00980 (ML-1) RF-B Iron, Total Recoverable Year Round | Reported | | | | | | | | | | | | | |
| | Permit Limits | N/A | N/A | | | N/A | Rpt Only Avg. Monthly | 1.5 Max. Daily | N/A | mg/l | | 1/quarter | Grab | |

* CEL = Compliance Evaluation Level

| | | |
|---|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed |
| | | Signature of Principal Executive Officer or Authorized Agent |
| Title of Officer | | |

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STATE OF WEST VIRGINIA
 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
 DISCHARGE MONITORING REPORT

FACILITY NAME: (HARRISON POWER STATION) MONONGAHELA POWER COMPA

CERTIFIED LABORATORY NAME: _____

LOCATION OF FACILITY: HAYWOOD; Harrison County

CERTIFIED LABORATORY ADDRESS: _____

PERMIT NO.: WV0005339 OUTLET NO.: 013

WASTELOAD FOR THE MONTH OF: _____

INDIVIDUAL PERFORMING ANALYSIS: _____

| Parameter | Quantity | Quantity | | Other Units | | | CEL* | Units | N.E. | Measurement Frequency | Sample Type |
|--|---------------|----------|------|-------------|--------------------------|------------------------|------|-------|------|-----------------------|-------------|
| | | Units | N.E. | | | | | | | | |
| 00981 (ML-1) RF-C Selenium, Total Recoverable Year Round | Reported | | | | | | N/A | mg/l | | 1/6 months | Grab |
| | Permit Limits | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | | | | | |
| 00978 (ML-1) RF-C Arsenic, Total Recoverable Year Round | Reported | | | | | | N/A | mg/l | | 1/6 months | Grab |
| | Permit Limits | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | | | | | |
| 70295 (ML-1) RF-C Solids, Total Dissolved (TDS) Year Round | Reported | | | | | | N/A | mg/l | | 1/6 months | Grab |
| | Permit Limits | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | | | | | |
| 81020 (ML-1) RF-C Sulfate Year Round | Reported | | | | | | N/A | mg/l | | 1/6 months | Grab |
| | Permit Limits | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | | | | | |
| 01059 (ML-1) RF-C Thallium, Total (as Tl) Year Round | Reported | | | | | | N/A | mg/l | | 1/6 months | Grab |
| | Permit Limits | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | | | | | |
| 01220 (ML-1) RF-C Chromium, Hex. Diss. Year Round | Reported | | | | | | N/A | mg/l | | 1/6 months | Grab |
| | Permit Limits | N/A | N/A | N/A | Rpt Only Avg. Monthly | Rpt Only Max. Daily | | | | | |
| | | | | | | | N/A | | | | |
| | | | | | | | N/A | | | | |

* CEL = Compliance Evaluation Level

| | | |
|---|--|--|
| Name of Principal Executive Officer | I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information including the possibility of a fine and imprisonment for knowing violations. | Date Completed |
| | | Signature of Principal Executive Officer or Authorized Agent |
| Title of Officer | | |