



Division of Surface Water National Pollutant Discharge Elimination System

Application for Modification of Ohio NPDES Permit

Note: An Ohio EPA Antidegradation Addendum must be submitted with all modification applications.

Submit this application to the appropriate district office.



Division of Surface Water
50 W Town St, Suite 700
PO Box 1049
Columbus, OH 43216-1049
(614) 644-2001

Central District Office
PO Box 1049
Columbus, OH 43216-1049
(614) 728-3778

Northeast District Office
2110 E Aurora Rd
Twinsburg, OH 44087
(330) 963-1200

Northwest District Office
347 N Dunbridge Rd
Bowling Green, OH 43402
(419) 352-8461

Southeast District Office
2195 Front St
Logan, OH 43138
(740) 385-8501

Southwest District Office
401 E Fifth St
Dayton, OH 45402
(937) 285-6357

For Agency Use	Facility Name: Ohio EPA Permit Number:	Date Received (yy/mm/dd): Application No.:
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Division of Surface Water
Application for Modification of Ohio NPDES Permit

A. Permit number for which modification is being requested: 31B00002*LD
B. Name of organization responsible for facility: Avon Lake Environmental Redevelopment Group, LLC
C. Address, location, and telephone number of facility producing the permitted discharge: 33570 Lake Road, Avon Lake, OH 44012 Lorain County. Contact Person: Norman Divers - (704) 731-2203
1. Name: Avon Lake Environmental Redevelopment Group, LLC
2. Mailing Address: 12601 Plantside Drive, Louisville, KY 40299
3. Facility location (include county): 33570 Lake Road, Avon Lake, OH 44012, Lorain County
4. Telephone: (704) 731 - 2203
D. Describe in detail the provision(s) of the permit the applicant wishes to modify. (Attach additional pages as necessary). The Avon Lake Generating Station retired on April 1, 2022. The plant was subsequently sold to Avon Lake Environmental Redevelopment Group, LLC (ALERG) on April 4, 2022. ALERG is not in the steam electric business and has begun the decommissioning/demolishing process at the plant. As a result, many of the current outfalls at the plant no longer receive discharge due to the plant being inoperable. ALERG requests modifications to the permit to eliminate the following outfalls from monitoring and reporting requirements: 1) #001 Circulating Water 2) #601 Bottom Ash Transport Water 3) #604 Unit 7 boiler Bottom Blow Water 4) #611 Metal Cleaning Wastewater 5) #612 Unit 9 Turbine Oil Cooler Water 6) #800 Circulating Intake Water This permit modification would result in only the following remaining permitted outfalls for the Facility: 1) #002 Combined Wastewater Treatment Discharge 2) #004 Low Volume Wastewater Treatment Discharge 3) #610 Coal Pile Runoff Treatment Discharge See attached Document for more detail related to each outfall.
E. Describe in detail the reason(s) a modification is desired. (Attach additional pages as necessary). See Ohio Administrative Code (OAC) 3745-33-04(D) for grounds for modification. See attached Document for more detail related to each outfall.

F. Name of receiving water or waters: Lake Erie

G. Describe requested modification in sufficient detail to allow Ohio EPA to process your request. If a Permit to Install is required under regulation OAC 3745-42, attach a completed application for a Permit to Install and make no other entries in this section. If a Permit to Install is not required and additional space is needed, provide the additional information on attached sheets.

The Avon Lake Generating Station retired on April 1, 2022. The plant was subsequently sold to Avon Lake Environmental Redevelopment Group, LLC (ALERG) on April 4, 2022. ALERG is not in the steam electric business and has begun the decommissioning/demolishing process at the plant. As a result, many of the current outfalls at the plant will no longer receive discharge due to the plant being inoperable. ALERG requests modifications to the permit to eliminate the following outfalls from monitoring and reporting requirements:

#001 Circulating Water

- 2) #601 Bottom Ash Transport Water
- 3) #604 Unit 7 boiler Bottom Blow Water
- 4) #611 Metal Cleaning Wastewater
- 5) #612 Unit 9 Turbine Oil Cooler Water
- 6) #800 Circulating Intake Water

This permit modification would result in only the following remaining permitted outfalls for the Facility:

- 1) #002 Combined Wastewater Treatment Discharge
- 2) #004 Low Volume Wastewater Treatment Discharge
- 3) #610 Coal Pile Runoff Treatment Discharge

Additional detail for each outfall is provided on the attached document.

An additional permit request to discharge residual bottom ash transport water via outfall 002 is described on the attached document as well.

I certify that I am familiar with the information contained in this application and that, to the best of my knowledge and belief, such information is true, complete and accurate.

Name and official title (type or print): Norman Divers Vice President, Environment, Health & Safety

Telephone: (704) 731 - 2203

Signature:



Date:

June 16, 2022



Antidegradation Addendum

Division of Surface Water

In accordance with Ohio Administrative Code (OAC) 3745-1-05 Antidegradation, additional information may be required to complete your application for a permit to install (PTI) or National Pollutant Discharge Elimination System (NPDES) permit. For any application that may result in an increase in the level of pollutant being discharged (NPDES and/or PTI) or for which there might be an activity taking place within a stream bed, the processing of the permit(s) may be required to go through procedures as outlined in the antidegradation rule. The rule outlines procedures for public notification and participation as well as the procedures pertaining to the levels of review necessary. The levels of review necessary depend on the degradation being considered/requested. The rule also outlines exclusion from portions of the application and review requirements and waivers that the Director may grant as specified in Section OAC 3745-1-05(D) of the rule. Please complete the following questions. The answers provided will allow the Ohio EPA to determine if additional information is needed. **All projects that require both an NPDES and PTI should submit both applications simultaneously to avoid going through the antidegradation process separately for each permit.**

A. General Information

Applicant:	Avon Lake Environmental Redevelopment Group, LLC
Facility Owner:	Avon Lake Environmental Redevelopment Group, LLC
Facility Location (city & county):	33570 Lake Road, Avon Lake, OH 44012, Lorain County
Application or Plans Prepared by:	NPDES Permit Modification
Project Name:	NPDES Permit Modification
NPDES Permit No. (if applicable):	31B00002*LD

B. Antidegradation Applicability

Is the application for? (check as many as apply)

☐	Application with no direct surface water discharge (<i>Projects that do not meet the applicability section of OAC 3745-1-05(B)(1)</i>). Examples include on-site disposal, extensions of sanitary sewers, spray irrigation, indirect discharge to POTW, etc. Complete Section E.
☒	Renewal NPDES application or PTI application with no requested increase in loading of currently permitted pollutants. Complete Section E.
☐	PTI and NPDES application for a new wastewater treatment works that will discharge to a surface water. Complete Sections C & E.
☐	PTI and/or NPDES application for an expansion/modification of an existing wastewater treatment works discharging to a surface water that will result in any of the following: • Addition of any pollutant not currently in the discharge; or • An increase in mass or concentration of any pollutant currently in the discharge; or • An increase in any current pollutant limitation in terms of mass or concentration. Complete Sections C & E.
☐	PTI application that involves placement of fill or installation of any portion of a sewerage system (i.e., sanitary sewers, pump stations, WWTP, etc.) within 150 feet of a stream bed. Please provide information requested on the stream evaluation addendum and complete Section E.
☐	Initial NPDES application for an existing treatment works with a wastewater discharge prior to October 1, 1996. Complete Sections D & E.
☐	Renewal NPDES application or modification to an effective NPDES permit that will result in any of the following: • A new permit limitation for a pollutant that previously had no limitation; or • An increase in any mass or concentration limitation of any pollutant that currently has a limitation.

C. Antidegradation Information

1. Does the PTI and/or NPDES permit application meet an exclusion as outlined by OAC 3745-1-05(D)(1) of the Antidegradation rule?

☐ Yes. **Complete Question C.2.**

☐ No. **Complete Questions C.3 and C.4.**

2. For projects that would be eligible for exclusions provide the following information:

- a. Provide justification for the exclusion.
- b. Identify the substances to be discharged, including the amount of regulated pollutants to be discharged in terms of mass and concentration.
- c. A description of any construction work, fill or other substances to occur or be placed in or near a stream bed.

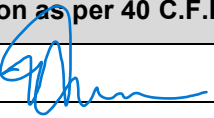
3. Are you requesting a waiver as outlined by OAC 3745-1-05(D)(2-7) of the Antidegradation rule? ☐ No ☐ Yes
If you wish to pursue one of the waivers, please identify the waiver and submit the necessary information to support the request. Depending on the waiver requested, the information required under question C.4. may be required to complete the application.

4. For all projects that do not qualify for an exclusion, a report must accompany this application evaluating the preferred design alternative, non-degradation alternatives, minimal degradation alternatives, and mitigative techniques/measures for the design and operation of the activity. The information outlined below should be addressed in this report. If a waiver is requested, this section is still required.

- a. Describe the availability, cost effectiveness and technical feasibility of connecting to existing central or regional sewage collection and treatment facilities, including long range plans for sewer service outlined in state or local water quality management planning documents and applicable facility planning documents.
- b. List and describe all government and/or privately sponsored conservation projects that may have been or will be specifically targeted to improve water quality or enhance recreational opportunities on the affected water resource.
- c. Provide a brief description of all treatment/disposal alternatives (preferred, non-degradation, minimal degradation and mitigative technique/measure) evaluated for this application and their respective operational and maintenance needs.

At a minimum, the following information must be included in the report for each alternative evaluated.

- d. Outline of the treatment/disposal system evaluated, including the costs associated with the equipment, installation, and continued operation and maintenance.
- e. Identify the substances to be discharged, including the amount of regulated pollutants to be discharged in terms of mass and concentration.
- f. Describe the reliability of the treatment/disposal system, including but not limited to the possibility of recurring operation and maintenance difficulties that would lead to increased degradation.
- g. Describe any impacts to human health and the overall quality and value of the water resource.
- h. Describe and provide an estimate of the important social and economic benefits to be realized through this proposed project. Include the number and types of jobs created and tax revenues generated.
- i. Describe environmental benefits to be realized through this proposed project.
- j. Describe and provide an estimate of the social and economic benefits that may be lost as a result of this project. Include the impacts on commercial and recreational use of the water resource.
- k. Describe the environmental benefits lost as a result of this project. Include the impact on the aquatic life, wildlife, threatened or endangered species.
- l. Describe any construction work, fill or other structures to occur or be placed in or near a stream bed.
- m. Provide any other information that may be useful in evaluating this application.

D. Discharge Information	
1. For treatment/disposal systems constructed pursuant to a previously issued Ohio EPA PTI, provide the following information:	
PTI Number:	
PTI Issuance Date:	
Initial Date of Discharge:	
2. Has the appropriate NPDES permit application form been submitted including representative effluent data? ☐ Yes Go to Section E. ☐ No See below.	
If no, submit the information as applicable under a or b as follows: a. For entities discharging process wastewater, attach a completed NPDES 2C form. b. For entities discharging wastewater of domestic origin, attach the results of a least one chemical analysis of the wastestream for all pollutants for which authorization to discharge is being requested and a measurement of the daily volume (gallons per day) of wastewaters being discharged.	
E. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is, to be best of my knowledge and belief, true, accurate and complete.	
This section must be signed by the same responsible person who signed the accompanying permit application or certification as per 40 C.F.R. 122.22.	
Signature:	
Date:	June 16, 2022



The Avon Lake Generating Station retired on April 1, 2022. The plant was subsequently sold to Avon Lake Environmental Redevelopment Group, LLC (ALERG) on April 4, 2022. ALERG is not in the steam electric business and has begun the decommissioning/demolishing process at the plant. As a result, many of the current outfalls at the plant no longer receive discharge due to the plant being inoperable. ALERG requests modifications to the permit to eliminate the following outfalls from monitoring and reporting requirements:

1. **#001 Circulating Water** – The electrical systems for the circulator pumps have been disconnected. These pumps provided the flow for this outfall. ALERG requests a permit modification to remove this outfall from the permit and eliminate the requirements for monitoring and reporting discharge from this outfall.
2. **#601 Bottom Ash Transport Water** – Following plant closure and sale to ALERG bottom ash transport water (BATW) will no longer be generated after March 31, 2022. ALERG requests a permit modification to remove this outfall from the permit and eliminate the requirements for monitoring and reporting.
3. **#604 Boiler Blowdown Water** - Following plant closure and sale to ALERG as well as the electrical systems for the circulator pumps being disconnected there will no longer be boiler blowdown water generated at the facility. ALERG requests a permit modification to remove this outfall from the permit and eliminate the requirements for monitoring and reporting.
4. **#611 Metal Cleaning Wastewater** - Following plant closure and sale to ALERG metal cleaning wastewater will no longer be generated after March 31, 2022. ALERG requests a permit modification to remove this outfall from the permit and eliminate the requirements for monitoring and reporting.
5. **#612 Unit 9 Turbine Oil Cooler Water** - Following plant closure and sale to ALERG Unit 9 Turbine Oil Cooler Water will no longer be generated after March 31, 2022. Additionally, the electrical systems for the circulator pumps have been disconnected. ALERG requests a permit modification to remove this outfall from the permit and eliminate the requirements for monitoring and reporting.
6. **#800 Circulating Intake Water** - The electrical systems for the circulator pumps have been disconnected. These pumps provided the flow for this outfall (intake). ALERG requests a permit modification to remove this outfall from the permit and eliminate the requirements for monitoring and reporting discharge from this outfall.

This permit modification would result in the only remaining permitted outfalls at the facility as described below. Reporting and Monitoring of these outfalls will continue as specified in the current NPDES permit.

1. #002 Combined Wastewater Treatment Discharge
2. #004 Low Volume Wastewater Treatment Discharge
3. #610 Coal Pile Runoff Treatment Discharge

Future permit modifications will be submitted to remove each of the remaining outfalls once the decommissioning/demolition process is completed resulting in no discharge or only non-contact stormwater discharge.

Additional Permit Request:

Following plant closure and sale to Avon Lake Redevelopment Group, LLC (ALERG) bottom ash transport water (BATW) will no longer be generated after March 31, 2022, and will be in compliance with effluent limitation guideline under Condition O on April 1, 2022. However, BATW contained within the Bottom Ash Transport System will need to be discharged via Outfall 002.

We request approval to decommission the Bottom Ash Transport System by allowing bottom ash fines within the BATW to settle prior to dewatering the Bottom Ash Transport System. Following settling, the remaining water will be pumped to the primary/secondary wastewater ponds, which are now equipped with turbidity curtains, and will be treated prior to discharge to Lake Erie via outfall 002. ALERG will maintain compliance with the Outfall 002 Discharge Limitations. Lab analysis was performed on the BATW for the monitoring parameters of outfall 002. The sample results are included in **Table 1**. Additionally, the 002 outfall parameters are included below the results.



Table 1 – Bottom Ash Transport Water Sample

Lab #	Sample ID	Date Collected	Parameter	Result	Units	PQL	Method of Analysis	Date of Analysis	CAS#
M22-16436-01	Recycle Tank	03/16/22 08:20	Oil & Grease, Total	<5.0	mg/L	5.0	EPA 1664A (HEM)	03/25/2022	
M22-16436-01	Recycle Tank	03/16/22 08:20	Total Suspended Solids	4.8	mg/L	4.0	SM 2540D-15	03/18/2022	
M22-16436-01	Recycle Tank	03/16/22 08:20	Mercury, Low Level	1.47	ng/L	0.500	EPA 1631E	03/22/2022	7439-97-6
M22-16436-02	Recycle Tank Blank	03/16/22 08:30	Mercury, Low Level	2.81	ng/L	0.500	EPA 1631E	03/22/2022	7439-97-6
M22-16436-03	Recycle Tank	03/16/22 08:35	Copper, Total	<10	ug/L	10	EPA 200.8 Rev. 5.4	03/22/2022	7440-50-8

Table - Final Outfall - 002 - Final

Effluent Characteristic Parameter	Discharge Limitations							Monitoring Requirements		
	Concentration Specified Units				Loading* kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00530 - Total Suspended Solids - mg/l	100	-	-	30	-	-	-	1/Week	24hr Composite	All
00550 - Oil and Grease, Total - mg/l	20	-	-	15	-	-	-	1/Month	Grab	All
01119 - Copper, Total Recoverable - ug/l	-	-	-	-	-	-	-	1/Quarter	24hr Composite	All
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	24hr Total	All
50092 - Mercury, Total (Low Level) - ng/l	1700	-	-	2.6	0.0192	-	0.000030	1/Month	Grab	All
51600 - pH Range Excursion, Maximum Duration - Minutes	60	-	-	-	-	-	-	1/Day	Total	All
61941 - pH, Maximum - S.U.	-	-	-	-	-	-	-	1/Day	Continuous	All
61942 - pH, Minimum - S.U.	-	-	-	-	-	-	-	1/Day	Continuous	All
82581 - pH Range Excursions, > 60 Minutes - Number/Day	0	-	-	-	-	-	-	1/Day	Total	All
82582 - pH Range Excursions, Monthly Total Duration - Minutes	446	-	-	-	-	-	-	1/Month	Total	All

Notes for Station Number 3IB00002002: