



October 6, 2017

Via Email and First Class Mail

Mr. Michael Richardson
Chief, Industrial and General Permits Division
Maryland Department of the Environment (MDE), Water and Science Administration
1800 Washington Boulevard
Baltimore, Maryland 21230-1780

Re: Draft NPDES Permit No. MD0002640, GenOn Mid-Atlantic, LLC, Dickerson
Generating Station

Dear Mr. Richardson:

The District of Columbia Water and Sewer Authority (DC Water) appreciates the opportunity to comment on the draft NPDES Permit MD0002640 for the Dickerson Generating Plant owned and operated by NRG Energy.

DC Water purchases seventy-five percent of the treated drinking water produced by the US Army Corps of Engineers Washington Aqueduct (Aqueduct). The Aqueduct withdraws approximately 180 million gallons of water each day from the Potomac River at the Great Falls and Little Falls intakes and treats the water at two treatment plants, Dalecarlia and McMillan. These intakes are located on the Maryland side of the Potomac River downstream from the Dickerson Generating Plant. The Aqueduct treats the Potomac River water and sells potable water to its three wholesale customers – DC Water, Arlington County and Fairfax Water, which is distributed to over 2.5 million residents and visitors, commercial and governmental customers in the Washington Metropolitan Area that are dependent on safe, potable water that comes from the Potomac River.

The Potomac River is the only source water for the Aqueduct's two water treatment plants and its operations were directly affected by the turbine oil discharge event from the GenOn ERG Mid-Atlantic Dickerson Generating Station (Dickerson Facility) that occurred in November and December 2016. Given the disastrous consequences to the region should a discharge from the Dickerson Facility result in the interruption of a viable source of water from the Potomac River, DC Water recommends that the Maryland Department of the Environment (MDE) include the following requirements in the Permit.

Discharge Notification: A major challenge for all the water providers in this region during the spill event at the Dickerson Generating Plant was timely discharge notification. It took several

days for NRG to acknowledge that an event had occurred at the Dickerson Treatment Plant and even more time to identify the contaminant that resulted in the sheen on the surface of the Potomac River that extended miles downstream. Considering the number of water treatment plants downstream of the Dickerson Generation Plant and the millions of people dependent on these plants and the Potomac River source water, MDE should modify permit's notification requirements in the event of an unpermitted discharge near or into the Potomac River from outfalls 001, 002, and 003. At a minimum, the permit should require immediate notification, but no later than four hours after observation of an unpermitted discharge and the notice should be sent to the Environmental Protection Agency (EPA), MDE and the Interstate Commission of the Potomac River Basin (ICPRB).

Containment: Another challenge confronted by the water providers was containment of the spill after the sheen first appeared on the Potomac River. Since there was no acknowledgement of the spill by NRG for several days it was the consensus of the water providers that spill containment could have been more effectively accomplished given that the sheen on the river extended miles downstream of the Dickerson Generating Plant. The permit should require the Dickerson facilities to include in their Emergency Response Plan spill containment equipment and spill response procedures and countermeasures in the event of an unpermitted discharge into the Potomac River.

Water Quality Limits and Monitoring: A growing concern is not only an unpermitted discharge, but also the increasing contamination from other products or byproducts used or created at any of the Dickerson facilities, including the industrial wastewater treatment plant, sewage treatment plant, flue gas desulphurization treatment plant, ash handling, and stormwater runoff. Historical trends show an increase in conductivity, chloride, and bromide in the Potomac River, as observed by capital region water purveyors, as well as our own water quality evaluations.

Chloride and sulfate has been proven to increase corrosion in drinking water distribution systems, which impacts iron and lead release in plumbing systems. Evidence exists that drinking water utilities have reported observations of immediate changes to iron release within the distribution system following chloride changes. In addition, bromide in the source water can react with chemicals in the treatment process forming concentrations of brominated Disinfection By-products (DBPs) that are regulated by the Stage 2 Disinfection By-product Rule for drinking water systems. There is a high probability that some percentage of bromide concentrations in the Potomac River are attributable to the Dickerson Generating Plant. DC Water has observed increasing trends in brominated DBPs as shown in attached enclosures.

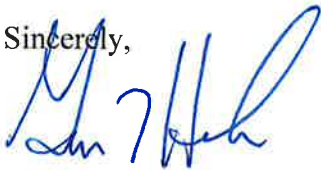
The permit should include monitoring and limits for these parameters at all outfalls. Further, the permit should include a requirement to conduct a professional study to determine reasonable effluent limits for this type of industrial plant, including but not limited to, the following parameters: conductivity, chloride, sulfate, bromide and total and hexavalent chromium, in addition to those parameters already listed. Identifying appropriate limits and monitoring frequencies are needed to ensure that the Potomac River water drinking treatment facilities will be able to deliver drinking water that meets Safe Drinking Water Act regulations, in addition to improving the health of the Potomac River.

DC Water strongly urges MDE to include discharge limits and notification to the downstream water utilities of chloride, sulfate, total or hexavalent chromium, and bromide discharges from the Dickerson Generating Plant. The notification can be made to ICPRB and they can distribute the notification to the downstream water utilities.

Spill or Unpermitted Discharge Monitoring: The permit should require continuous monitoring and an early warning system with alarms to detect spills or discharges originating from the Dickerson Generating Plant into the discharge stream. The permit should require periodic inspections of the river banks downstream of the Dickerson Generating Plant within the permit limits to visually inspect for possible discharges into the Potomac River. The potential drinking water contaminants from this facility necessitate the permit require online monitors and alarms for discharges as well as frequent, daily, at a minimum, visual monitoring of all outfalls for potential signs of upsets, spills, or leaks of industrial discharge, coal pile and/or fly ash runoff. Online monitoring parameters should characterize unusual discharges, including detection of petroleum products, or a suitable surrogate above and beyond current oil & grease monitoring. Further, alarms should transmit to a continually staffed operations center to immediately investigate and mitigate discharge or spill sources. Online monitoring data, access and information for major discharge outfalls should be provided to EPA, MDE and ICPRB and should be continually available.

Thank you for the opportunity to comment on the draft NPDES permit. Please contact Biju George, Chief Operating Officer, at 202-787-2618, if you have any questions or require additional information.

Sincerely,



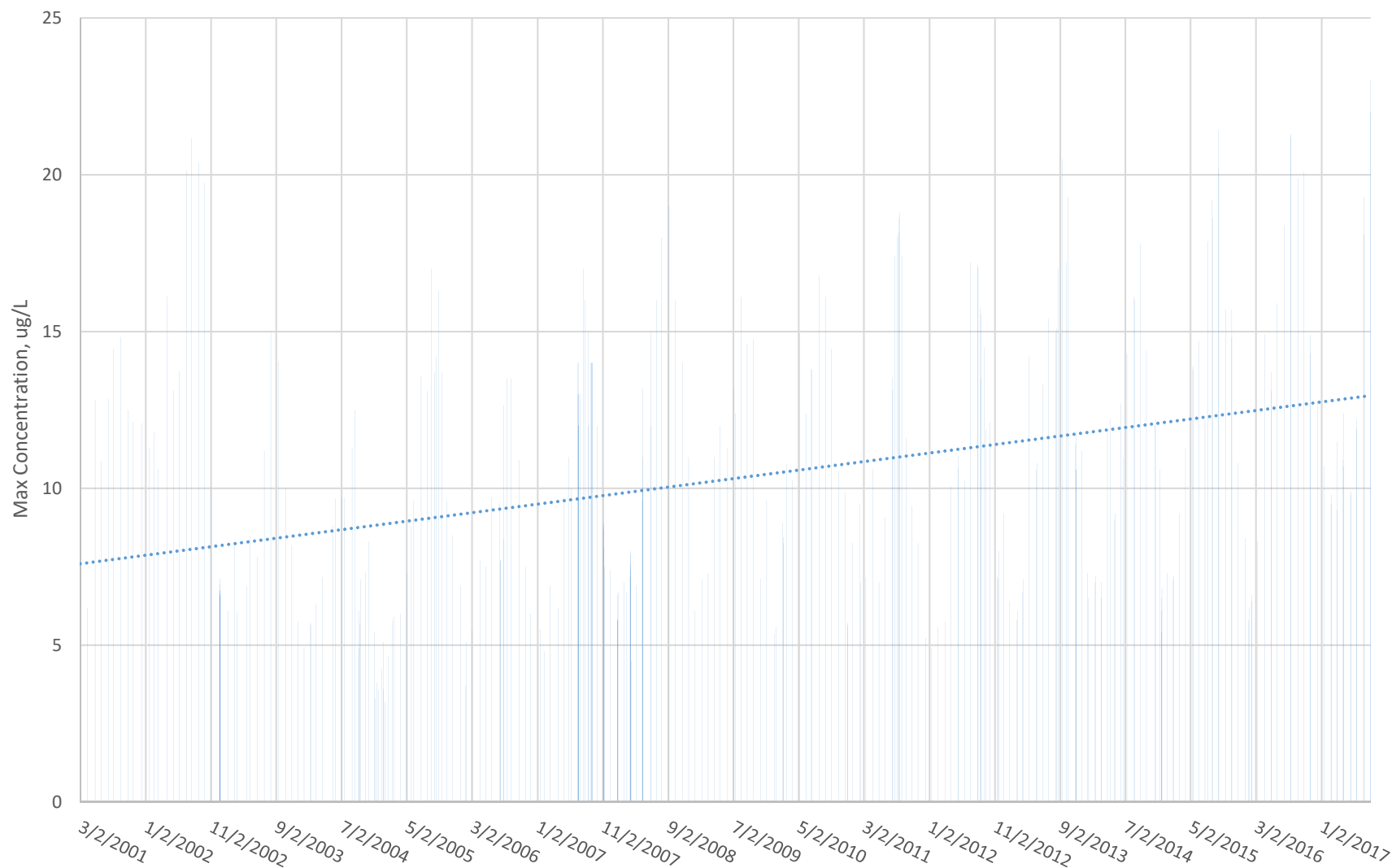
George S. Hawkins
General Manager & CEO

Attachments

- C: Tom Jacobus, General Manager, Washington Aqueduct, U.S. Army Corps of Engineers
Carlton Haywood, Executive Director, ICPRB
Steve Beiber, Chief, Urban Watershed Programs and Homeland Security, MWCOG
Charles M. Murray, General Manager, Fairfax County Water Authority
Greg Emanuel, Director, Department of Environmental Services, Arlington County
Carla Reid, General Manager/CEO, WSSC
Dale Hammes, General Manager, Loudon Water
Amy Wykes, Director of Utilities, Town of Leesburg

Trihalomethane DBPs - Brominated Species 2001-2017 (Monthly max value)

Series1 Linear (Series1)



Haloacetic acid DBPs - Brominated Species
(HAA5 & HAA9)
2001-2017
(Monthly max value)

