Ground Water Discharge Permit

Permit No. UGW15001

HUNTER POWER PLANT GROUNDWATER DISCHARGE PERMIT BEST MANAGEMENT PLAN

Revision 2

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Date

Prepared by:

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APPROVED:

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INTRODUCTION

The Hunter Power Plant has implemented Best Management Practices (BMP) to prevent or minimize the potential for degradation of the surface and ground water sources. These practices are utilized in conjunction with Hunter's Storm Water Pollution Prevention Plan, Spill Control and Countermeasures Plan, Solid and Hazardous Waste Management Plan, Waste Water Land Application Plan, and Site Wide Monitoring and Sampling Plan.

The facilities included in Tables 3 and 4 of the Ground Water Discharge Permit No. UGW150001, are inspected at a minimum on a monthly basis. Many of these facilities are inspected daily or weekly as part of the required operator's routine inspections. In addition to the routine visual inspection of the permitted facilities, a network of surface and ground water monitoring locations have been established to monitor for any degradation of the water leaving the site.

BEST MANAGEMENT PRACTICES

Good Housekeeping

Good housekeeping requires the operation and maintenance of a clean and orderly facility. All plant operations crews have specific clean-up areas assigned to them and a schedule for clean-up activity. These areas cover the entire facility.

Vehicle and Equipment Cleaning, Storage, Fueling, and Maintenance Areas

Cleaning, storage, and maintenance of vehicles and equipment is confined to designated areas whereby the potential to degrade water sources is prevented or minimized.

The co-mingling of storm water with products used to service vehicles and equipment is prevented or minimized through the construction, maintenance, and use of berms, ditches, storage facilities and/or collection treatment systems for these areas.

Use appropriate devices to collect oil and grease, fuel vehicles and equipment, contain and absorb a spill, and cleanup a spill in a timely manner.

Material Storage Areas

Clearly label and maintain in good condition storage containers. Whenever possible, use enclosed facilities to store materials or provide temporary covering to minimize the potential for pollutants to come in contact with storm water.

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, storage facilities, and/or collection/treatment systems for these areas.

Clean up spills in a timely manner using dry cleanup methods.

Loading/Unloading Areas

Ensure appropriate spill control plan is in place and plant personnel are familiar with the plan. Locate shipping and receiving activities where spills or leaks can be contained.

Cover or protect loading and unloading areas from exposure to precipitation.

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, storage facilities, and/or collection/treatment systems for these areas.

Delivery Vehicles

Vehicles that arrive to make a delivery should be accompanied by plant personnel and adequate spill containment and countermeasures should be in place to respond to leakage or spillage from the vehicle.

The vehicle should not be left unattended during the unloading process.

<u>Scrapyards</u>

Consolidate scrapyards where possible and minimize their size. Control the storage of scrap and materials that may contain residual fluids. Provide level grades and gravel surfaces to retard flows and limit the spread of spills.

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, storage facilities, and/or collection/treatment systems for these areas.

Inspect solid waste landfill at least once per quarter. Inspections will monitor compliance with operating plans.

Take fugitive dust control measures to minimize emissions.

CCR Hauling Vehicles

CCR hauling vehicles should be inspected, cleaned and maintained to ensure the overall integrity of the vehicle and CCR container.

The CCR will contain the proper amount of water such that fugitive dust emissions are minimized.

CCR Loading and Haul Road Areas

Good housekeeping practices will be observed to reduce and/or control the tracking of CCR or residue from loading areas. The CCR building and adjacent roadways will be cleared and cleaned of spillage and debris to minimize any contact with storm water.

Maintain CCR haul road in good condition to minimize bumps and uneven surfaces. The speed of the vehicles on the CCR haul road will be maintained at a reasonable level for the road conditions.

Take fugitive dust control measures to minimize emissions.

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, storage facilities, and/or collection/treatment systems for these areas.

Above Ground Storage Tanks, Substations, and Storage Areas

Inspect above ground petroleum storage tanks and electrical transformers in accordance with the Spill Prevention, Control and Countermeasures (SPCC) Plan and all other bulk storage tanks on a routine basis. Provide appropriate secondary containment for petroleum and bulk storage tanks to prevent spills from leaving the plant site.

Provide liquid level gauging devices and avoid overfilling tanks. Locate all mobile or portable tanks in a position that prevents a discharge.

Cleanup all spills or released in a timely manner.

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, storage facilities, and/or collection/treatment systems for these areas.

Research Farm

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, and/or storage facilities, for this area. The control devices will be inspected regularly to confirm the integrity of the facilities.

Irrigation application rate controlled to prevent surface run-off and deep percolation.

Monitor upstream and downstream surface and groundwater locations in accordance with Groundwater Permit.

Process Water Ponds

Utilize clay, synthetic membrane, or concrete liners. Inspect and maintain liner system integrity. Inspect ponds at a minimum once per quarter for seeps or other signs of leakage.

Monitor leak detection systems.

Monitor upstream and downstream surface and groundwater locations in accordance with Groundwater Permit.

Avoid overfilling ponds.

Minimize waste water flows.

Flue Gas Desulfurization (FGD) Waste

Ensure there is no free liquid content of FGD slurry by dewatered or mixing with CCR so the material passes the paint filter test prior to placement on the CCR landfill.

Insure adequate separation between groundwater and impoundment, and adequate containment of embankment.

Monitor upstream and downstream surface and groundwater locations in accordance with Groundwater Permit.

Clean up spills and take fugitive dust control measures to minimize emissions.

Coal Pile

Storm water run-on/run-off should be minimized through the construction, maintenance, and use of berms, ditches, storage facilities, and/or collection/treatment systems for these areas.

Monitor upstream and downstream surface and groundwater locations in accordance with Groundwater Permit.

Take fugitive dust control measures to minimize emissions.

Preventative Maintenance

Utilize Plant's work management system to monitor and inspect systems to uncover conditions that could cause breakdowns or failures which have the potential to pollute.

Facility Security

Monitor Plant property using security personnel and other surveillance tools so that the ingress and egress of those entering and exiting the property is known and the likelihood of vandalism is minimized.

Employee Training

When properly trained, Plant personnel are more capable of preventing spills, responding safely and effectively to an incident when one occurs, and recognizing a situation or condition that could result in surface or ground water contamination.

Continuous Improvement

Monitor the effectiveness of BMP's using inspection programs whereby the information garnered can be utilized to improve upon current practices.

Inspections of the BMP's are maintained in the Environmental Department's files.

Conclusion

Through the implementation of Best Management Practices the entire environmental management system will better recognize impacts, reduce pollution, improve continually, and comply environmentally.