

# **Draft NPDES Permit**

# Draft NPDES Permit Issues

- Received draft NPDES permit in May.
- Major Permit Issues Include:
  - Much lower Dry Dock discharge limits
    - Cu 2.4 ppb monthly avg; 5.8 ppb daily max
    - Limits also specified for temperature, Zn, Pb, As, Hg, Cl
  - First ever storm water discharge limits
    - Cu 5.8 ppb
    - Limits also specified for Zn, Pb, As, Hg
  - Substantial increase in monitoring, inspection and reporting requirements
  - Many new process control requirements

# Multi-Pronged Approach

- Source Control
  - Paint Application Technologies
  - Capture of Overspray
- Cleaning/Best Management Practices
  - Improved cleaning procedures
  - Divert cooling water within 24 hours of dewatering
  - Incorporate end-of-project cleaning into the overhaul schedule prior to dumping cooling water
- Upgrading the Process Water Collection Systems

# Next Steps

- Continue to pursue Mil-Con P-419, (Integrated Dry Dock Process Water Collection System)
- PSNS & IMF must upgrade its facilities to meet industry standards to reduce discharges of copper and other heavy metals
- PSNS & IMF must complete the AKART study to qualify for mixing zones
- PSNS & IMF and the EPA must negotiate reasonable compromises on operational controls.

PSNS&IMF All Known Available  
Reasonable Treatment (AKART)  
& Mixing Zone Study Results  
Potential Impacts to facilities

# Mixing Zone Qualifications

- To qualify for a mixing zone we were required to complete an AKART study and a mixing zone study.
- AKART compares our pollution prevention practices to industry standards
- Mixing Zone Study determines how quickly a given discharge is diluted to WQC
- Mixing Zones are required to be as small as possible

# AKART Study Results

- The AKART study indicated that PSNS&IMF falls short of current industry standards in the following facility related areas:
  - Building 455 and maintenance areas
  - Crane maintenance area
  - Frequency of facility cleaning
  - Lack covers all garbage containers
  - Increased storm/sanitary sewer maintenance
  - Cover all metal working areas

# Mixing Zone Study Results

- EPA's model does not work for our storm water outfalls
- Dry docks 1-5 discharge through 3 main outfalls. Two of them will probably need to be extended
- Dry dock 6 and the power plant outfall's had what we believe are acceptable mixing zones

# Next Steps

- Finalize the AKART and Mixing Zone Studies
- EPA must determine strategy for storm water mixing zones
- Permit will need to be certified by National Marine Fisheries Service
- EPA will include a compliance schedule to complete AKART upgrades and may include extension of outfalls