



State of Ohio Environmental Protection Agency

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P.O. Box 1049
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August 24, 2010

Re: Non-Contact Cooling Water General Permit Renewal

Dear General Permit Holder:

After Ohio EPA public noticed the renewal of the non-contact cooling water (NCCW) general permit (permit # OHN000004) in February 2010, U.S. EPA expressed a number of concerns regarding the contents of the permit based upon their review. We have revised the draft general permit to address U.S. EPA's concerns, and these revisions are as follows:

- Compliance with Section 316(b) of the Clean Water Act. Facilities which withdraw water from surface waters must meet one of several conditions in order to comply with Section 316(b). [See Part I.C.2. of the NCCW general permit];
- Eligibility requirements for permittees using ground water. Facilities which obtain cooling water directly from ground water must sample the cooling water discharge and submit the results of a priority pollutant scan with the NOI. [See Part II.B.2.a. of the NCCW general permit.]. The total concentration of volatile organic compounds must be less than 100 ug/l. [See Part I.C.3.i. of the NCCW general permit.];
- Permittees obtaining water from a public water supply source must submit the results of a metals analysis of the wastewater discharged with the NOI. [See Part II.B.2.b. of the NCCW general permit.]; and
- Permittees discharging more than two hours per day must submit discharge monitoring results for total residual chlorine with the NOI. [See Part II.B.2.c. of the NCCW general permit.] The total residual chlorine concentration must be less than 0.038 mg/l.

The revised general permit reflecting the changes listed above can be reviewed under the **August 24, 2010** heading at:

http://epa.ohio.gov/dsw/permits/NonContactCoolingWater_draft_GP_feb10.aspx

Please contact me at mike.mccullough@epa.state.oh.us if you have concerns or questions regarding these proposed changes. All comments must be received by September 30, 2010, and may be submitted via email or U.S mail sent to my attention at the following address:

Ohio Environmental Protection Agency
Lazarus Government Center
Division of Surface Water
50 West Town Street, Suite 700
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Columbus, Ohio 43216-1049

Sincerely,

Mike McCullough
Division of Surface Water

Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director