

**FACT SHEET
FOR
STATE OF FLORIDA
DOMESTIC WASTEWATER FACILITY PERMIT**

April 20, 2007

PERMIT NUMBER: FL0021440 (Major)

PA NUMBER: FL0021440-009-DW1P/NR

FACILITY NAME: E.C.U.A. Main Street WWTF

FACILITY LOCATION: 401 West Government Street
Pensacola
Escambia County

NAME OF PERMITTEE: Emerald Coast Utilities Authority

PERMIT WRITER: Jonathan May

1. Introduction:

The applicant, Emerald Coast Utilities Authority (E.C.U.A.), applied on June 16, 2005 to the Department of Environmental Protection for a permit renewal to operate an existing 20 MGD average annual daily flow (AADF) permitted capacity oxygen activated sludge enrichment system (OASES) wastewater treatment facility (WWTF).

The principal major unit processes that make up the liquid treatment process include: Influent screening and pumping, aerated grit removal with odor control, alum addition for phosphorus removal, primary clarification, primary effluent pumping, lime addition to increase alkalinity, aerobic treatment with pure oxygen aeration, biological denitrification in anoxic zones with methanol addition and internal mixed liquor recycle, polymer addition for enhancing clarification, secondary clarification, return activated sludge (RAS) pumping, secondary effluent pumping, ultraviolet disinfection, and effluent flow measurement. OASES consist of five (5) enclosed trains, each having four (4) interior cells arranged in series.

The principal major unit processes that make up the residuals treatment process include: primary scum pumping, primary sludge pumping, secondary scum pumping, waste activated sludge (WAS) pumping, outlying plant sludge receiving, sludge screening, gravity thickening, thickened sludge pumping, thickened sludge conditioning by straining, thickened sludge conditioning by polymer addition, centrifugal dewatering, fluidized bed drying, Class AA residuals for distribution & marketing, and alternative disposal of sludge cake to approved landfills. The WWTF will also serve as a domestic wastewater residual management facility (RMF).

The WWTF is located at latitude 30°24'25" N, longitude 87°13'20" W at 401 West Government Street, Pensacola, FL 32502 in Escambia County.

This permitting action is the issuance of a wastewater permit renewal to allow continued operation of the 20 MGD AADF WWTF with effluent discharge to Pensacola Bay (Marine Class III surface water) until a replacement WWTF (Central Water Reclamation Facility) can be built and placed into service.

The Department has permitting jurisdiction under Section 403.087, Florida Statutes (F.S.) and Sections 62-4, 62-302, 62-600, 62-601, 62-610, 62-620, 62-640, and 62-699, Florida Administrative Code (F.A.C.). The project is not exempt from permitting procedures. The Department has determined that a wastewater permit is required for the proposed work.

2. **Background:**

After Department review of E.C.U.A. Main Street WWTF's monthly Discharge Monitoring Reports (DMRs) for 2004 and 2005, violations of the facility's permit effluent limits and/or Department rule were found. As a result, the Department executed Consent Order (OGC File No. 06-2097-17-DW) on November 3, 2006, resolving the domestic wastewater issued relating to the E.C.U.A. Main WWTF (FL0021440)

3. **E.C.U.A. Main Street WWTF Replacement:**

On September 6, 2006, the Department responded to E.C.U.A.'s submittal of the Main Street Wastewater Treatment Plant (MSWWTP) Replacement Facilities Plan as adopted by the Emerald Coast Utilities Authority (ECUA) Board on May 25, 2006, and submitted as a draft executive summary for Department review. After review of the MSWWTP Replacement Facilities Plan, the Department continues to support the MSWWTP replacement sewer project. In addition, the Department's letter dated December 20, 2005 requirements will be held in abeyance pending permitting, construction completion and operation of the proposed sewer project.

The MSWWTP Replacement Facilities Plan was submitted to the Department to gain support for MSWWTP replacement with an Advanced Wastewater Treatment Water Reclamation Facility (referred to as the Central Water Reclamation Facility) in a more environmentally secure location. In addition, ECUA is requesting that the proposed new Central Water Reclamation Facility (CWRF) defer the requirements of the Department's letter dated December 20, 2005. The December 20th letter required ECUA to address the following items at the MSWWTP:

- Addition of an on-site power generation system;
- Flood proofing of process-critical components;
- Class I reliability throughout the treatment plant;
- Addition of reject storage capability;
- Restoration of the functional capacity of the existing submerged outfall; and
- Strengthening, armoring or enclosure of the process-critical components of the treatment plant to prevent wind damage.

Since 1937 the ECUA's MSWWTP has been in operation on an 18-acre site. MSWWTP is designed for 20 MGD average daily flow (ADF). However, due to the MSWWTP's advanced age and the limitations of the relatively small site, MSWWTP has been unable to consistently meet the permit requirements of the Department's operating permit (FL0021440), has been a financial burden to ECUA and has been a constant source of foul odor for years. In accordance with the draft executive summary, the importance of replacing the MSWWTP was emphasized when Hurricane Ivan struck Pensacola in September 2004, rendering MSWWTP inoperable for three (3) days and causing the release of raw sewage into the streets of Pensacola. Further, Hurricane Ivan with its wind driven saltwater, aged the already outdated plant by approximately 10 years. The need to replace and relocate MSWWTP is an urgent priority for ECUA.

ECUA proposes to design and construct a new CWRF that will meet the following criteria:

CBOD ₅	5 mg/L	(Annual Average)
TSS	5 mg/L	(Annual Average)
TN	3 mg/L	(Annual Average)
TP	1 mg/L	(Annual Average)

The specific comments about MSWWTP Replacement Facilities Plan proposed project is discussed below:

- Treatment facility, collection/transmission sewer system and reclaimed water transmission system appear to be conceptually acceptable. However, the effluent disposal system proposed disposal methods of rapid infiltration basins and man-made wetlands are incomplete and have not been developed thoroughly enough to make a recommendation.
- Conceptually, the Northwest District, Domestic Wastewater Section has no objections to the proposed CWRP sewer project.
- The Domestic Wastewater Section has not permitted the proposed treatment facility, collection/transmission sewer system, reclaimed water transmission system and effluent disposal system project. The Domestic Wastewater Section has permitting jurisdiction under Sections 403.087, Florida Statutes and Rules 62-4, 62-600, 62-601, 62-604, 62-610, 62-611, 62-620 and 62-640, Florida Administrative Code. The project is not exempt from permitting procedures.
- The Domestic Wastewater Section has determined that a domestic wastewater permit will be required for the proposed sewer project.
- The proposed reuse projects may require review and permit(s) from the Submerged Lands Environmental Resource Program (SLERP) for dredge and fill as well as storm water issues.

The Central Water Reclamation Facility permit application (PA File Number FLA559351-001-DW1P/NP) was received on February 28, 2007. The permit application is under review. E.C.U.A. proposes a new Central Water Reclamation Facility (CWRP) with a treatment capacity of 20 MGD annual average daily flow (AADF). CWRP will replace the existing Main Street WWTF. E.C.U.A. has proposed that the effluent disposal will be by industrial reuse to International Paper and Gulf Power (Chapter 62-610, Part VII) as well as at the CWRP plant site.

The WQBEL Level I Study was conducted pursuant to Rules 62-600.430 and 62-650, Florida Administrative Code (F.A.C.). The WQBEL Level I Study confirmed the previous final effluent limits for this permit of:

Flow	20 MGD
CBOD ₅	8 mg/L
TSS	8 mg/L
TN	7 mg/L (at flows up to 16.5 MGD)
TN	6 mg/L (at flows equal to or exceeding 16.5 MGD)
TP	1 mg/L
DO	5 mg/L

It is recommended that the Level I WQBEL documentation be accepted for the renewal of this permit. The CWRP will replace the existing Main Street WWTF in the near future. The draft TMDL Study for Pensacola Bay is due in 2007. The proposed permit has a re-opener clause (Condition I.B.10) that will reopen the permit to adjust effluent limitations or monitoring requirements should future wasteload allocation determinations, water quality studies, DEP approved changes in water quality standards, or other information show a need for a different limitation or monitoring requirement.

Pensacola Bay is a Class III surface water body. The southern (mouth) and northern portions (east of the 3 mile bridge) of Pensacola Bay, Bayou Chico, and Escambia Bay appear on the State's Section 303 (d) list of impaired water bodies. The parameters of concern for these bodies of surface water are coliforms, chlorophyll and nutrients. It should be noted that this is an existing discharge to the bay. The existing WWTP outfall currently does not discharge to that portion of the impaired water body. The existing discharge represents no change to the component wasteload presently being authorized as part of domestic wastewater renewal permit.

4. SYNOPSIS OF APPLICATION

a. Chronology of Application

Application Date: June 16, 2005
 Additional Information: September 30, 2005
 October 19, 2005
 January 12, 2006
 March 31, 2006
 Draft Permit Public
 Notice Date: Publication Needed

b. Type of Facility

Domestic Wastewater Treatment Plant
 Privately-owned treatment works
 Standard Industrial Classification Code: 4952

c. Facility Capacity

Existing Design Capacity:	20	MGD	AADF
Proposed Increase in Design Capacity:	0	MGD	AADF
Proposed Total Design Capacity:	20	MGD	AADF
Existing Permitted Capacity:	20	MGD	AADF
Proposed Increase in Permitted Capacity:	0	MGD	AADF
Proposed Total Permitted Capacity:	20	MGD	AADF

d. Description of Effluent or Reclaimed Water Discharges (as reported by applicant)

1) Outfall Serial Number D-001:

- Description of Outfall & Diffuser 48" outfall line
- Length from Shore 2,095 feet
- Pipe Diameter 48 inches
- Discharge Depth Below Water Surface 21 feet
- Receiving Water Bottom Depth Below Water Surface 23 feet

Outfall Serial Number D-001

Annual Average Daily Flow (MGD): 20.0 MGD

pH Range (Standard Units): 6.5 – 8.5 SU

Pollutants which are present in significant quantities or which are subject to effluent or reclaimed water limitations are as follows:

Parameters	Reported	Data
	Maximum Daily Value	Average Daily Value
Flow (MGD)	33.74	17.02
pH (s.u.)	7.6	-
Fecal Coliform (#/100 mL)	>6000	12
CBOD5 (mg/L)	67	3.5

Parameters	Reported	Data
Chlorine Total Residual (mg/L)	--	--
Total Suspended Solids (mg/L)	458	12.7
Dissolved Oxygen (mg/L)	9.5	7.0
Total Phosphorus (mg/L)	11.08	0.61
TKN (mg/L)	45.3	3.1
Nitrate plus Nitrite (mg/L)	19.6	2.4
Oil and Grease (mg/L)	<5	<5

5 BASIS FOR EFFLUENT AND RECLAIMED WATER LIMITS AND MONITORING REQUIREMENTS (INCLUDING EFFLUENT MONITORING REQUIREMENTS)

- a. The following table provides the basis for Part I. A. provisions.

Outfall D-001 (Class III marine water):

Parameter	Limit	Basis	Rationale
Flow (MGD)	20	Annual Average	62-600.400(3)(b) FAC
BOD, Carbonaceous 5 day, 20C (MG/L)	8.0	Annual Average	62-650.400 FAC
	8.0	Monthly Average	62-650.400 FAC
	12.0	Weekly Average	62-600.740(1)(b)2.c. FAC
	16.0	Single Sample Max.	62-600.740(1)(b)2.d. FAC
Solids, Total Suspended (MG/L)	8.0	Annual Average	62-650.400 FAC
	8.0	Monthly Average	62-650.400 FAC
	12.0	Weekly Average	62-600.740(1)(b)2.c. FAC
	16.0	Single Sample Max.	62-600.740(1)(b)2.d. FAC
pH (SU)	6.5 to 8.5	Minimum and Maximum	62-302.530(52)
Coliform, Fecal (#/100ML)	200	Annual Average	62-600.440(4)(c)1. FAC
	200	Monthly Geo. Mean	62-600.440(4)(c)2. FAC
	400	90th Percentile	62-600.440(4)(c)3. FAC
	800	Single Sample Max.	62-600.440(4)(c)4. FAC
Nitrogen, Total (as N) (MG/L) *	6.0	Annual Average	62-650.400 FAC
	6.0	Monthly Average	62-650.400 FAC
	9.0	Weekly Average	62-600.740(1)(b)2.c. FAC
	12.0	Single Sample Max.	62-600.740(1)(b)2.d. FAC
Nitrogen, Total (as N) (MG/L) *	7.0	Annual Average	62-650.400 FAC
	7.0	Monthly Average	62-650.400 FAC
	10.5	Weekly Average	62-600.740(1)(b)2.c. FAC
	14.0	Single Sample Max.	62-600.740(1)(b)2.d. FAC
Phosphorus, Total (as P) (MG/L)	1.0	Annual Average	62-650.400 FAC
	1.0	Monthly Average	62-650.400 FAC
	1.5	Weekly Average	62-600.740(1)(b)2.c. FAC
	2.0	Single Sample Max.	62-600.740(1)(b)2.d. FAC
Oxygen, Dissolved (DO) (MG/L)	4.0	Single Sample Min.	62-302.503(31) FAC

Parameter	Limit	Basis	Rationale
Oxygen, Dissolved (DO) (MG/L)	4.0	Single Sample Min. Daily Avg.	62-302.503(31) FAC
Copper, Total Recoverable (UG/L)	3.7	Single Sample Max.	62-302.530(23) FAC
Iron, Total Recoverable (MG/L)	0.3	Single Sample Max.	62-302.530(38) FAC
Zinc, Total Recoverable (UG/L)	86.0	Single Sample Max.	62-302.530(70) FAC
Silver, Total Recoverable (UG/L)	2.3	Single Sample Max.	62-302.530(59) FAC

“*” Denotes the total nitrogen maximum annual average to be 7.0 mg/L at flows up to 16.5 MGD, annual average daily flow. At flows equal to or exceeding 16.5 MGD, the total nitrogen limit will be 6.0 mg/L. The 6.0 mg/L total nitrogen limitation shall be effective when the rolling “three month” monthly average daily flow equals or exceeds 16.5 MGD for three consecutive months. At that time, the 7.0 mg/L limitation shall no longer be effective for flows less than 16.5 MGD.

Copper, iron, zinc and silver were in the previously issued permit and are recommended to remain in this permit due to the results of the three seasonal sampling events. It should be noted that the results for these parameters did not indicate exceedances of the surface criteria but were detected and should be monitored for continued compliance.

- b. following table provides the basis for Part I. B. provisions.

Other Limitations and Monitoring Requirements:

Parameter	Limit	Basis	Rationale
Percent Capacity, (TMADF/Permitted Capacity) x 100 (PERCENT)	Report	Monthly Average	62-600.405(4) FAC
BOD, Carbonaceous 5 day, 20C (MG/L)	Report	Monthly Average	62-601.300(1)FAC
Solids, Total Suspended (MG/L)	Report	Monthly Average	62-601.300(1)FAC
Monitoring Frequency and Sample Type	-	All Parameters	62-601 FAC & 62-699 FAC and/or BPJ of permit writer
Sampling Location	-	All Parameters	62-601, 62-610.412, 62-610.463(1), 62-610.568, 62-610.613 FAC and/or BPJ of permit writer

On December 8, 2005, the Department issued a final order granting E.C.U.A. a permanent variance File No. FL0021440-011-DWF/VO (OGC Case No. 05-2476) from Rule 62-601.500(4)(a), F.A.C., at the Main Street wastewater treatment plant, which in relevant part provides as follows:

“Influent samples shall be collected so that they do not contain digester supernatant or returned activated sludge, or any other plant process recycled waters.”

The requirement allow influent samples from its Main Street wastewater treatment plant to be collected prior to or after the influent has been commingled with internal recycle streams. In addition, the variance had a condition 10a. that influent sampling for the pretreatment program, permit Section VII had to be without the sidestream.

The wastewater treatment plant has been in existence for several decades. The wastewater treatment plant was neither designed nor constructed with this requirement in mind, and it has never had that ability. To modify the wastewater treatment plant at this point would technically be very difficult and would require substantial modification of the plant's influent piping and internal recycle stream piping. Such modifications would also be cost prohibitive and thus present an economic hardship to ECUA. Furthermore, incurring the great expenses associated with the required modifications would be especially unreasonable in the instant case given the fact that E.C.U.A. plans to replace the plant in question and build a new wastewater treatment plant at another location. Because it is envisioned that this new plant will produce a higher quality effluent, the diversion of monetary resources from the replacement project to modify the existing plant would be counter productive, possibly delay the replacement project, and thus have an adverse environmental impact. Moreover, whether influent samples are capable of being taken prior to the influent's being commingled with internal recycle streams has no impact on the effluent produced. Testing has confirmed that E.C.U.A. is exceeding the requirements for TSS and CBOD removal.

6. **RESIDUALS MANAGEMENT**

This facility is only allowed to distribute or market Class AA residuals of domestic wastewater residuals. [62-640.850]

Disposal of residual that does not meet Class AA should be sent to a Class I or II solid waste landfill [i.e. Escambia County (Perdido) Landfill, Santa Rosa County Landfill, Springhill Landfill, Timberland (BFI) Waste Systems (Brewton, AL), and Chastang Landfill].

The permittee shall sample and analyze the Class AA residuals to monitor for pathogen and vector attraction reduction requirements of Rule 62-640.600, F.A.C., and the parameters listed in the table below at least monthly. All samples shall be representative of the residuals used or distributed and marketed, and shall be taken after final treatment of the residuals but before use or distribution and marketing. The following table provides the basis for Part II.8. provisions:

Parameter		Basis for Limit/Monitoring Requirement
Total Nitrogen, % dry weight	Report	62-640.650(1)(b) FAC
Total Phosphorus, % dry weight	Report	62-640.650(1)(b) FAC
Total Potassium, % dry weight	Report	62-640.650(1)(b) FAC
Arsenic, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Cadmium, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Copper, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Lead, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Mercury, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Molybdenum, mg/kg dry weight	Report	62-640.650(1)(b) FAC
Nickel, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Selenium, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
Zinc, mg/kg dry weight	Maximum	62-640.850(3)(a) & 650(1)(b) FAC
pH, std. units	Report	62-640.650(1)(b) FAC
Total Solids, %	Report	62-640.650(1)(b) FAC
Monitoring Frequency	All Parameters	62-640.650 & 650(1)(c) & .850(4)(e) FAC

Parameter		Basis for Limit/Monitoring Requirement
Monthly Distribution and Marketing	Report	62-640.850(4) FAC
Pathogen and vector attraction reduction monitoring	All Parameters	62-640.600 & 650(1)(a) FAC
Any Other Parameters determined necessary	All Parameters	62-640.650(1)(b) FAC

7. GROUND WATER MONITORING REQUIREMENTS

This section is not applicable.

8. SCHEDULES FOR IMPROVEMENT ACTIONS, CONSTRUCTION, AND ENGINEERING STUDIES

This section is not applicable to this facility

9. INDUSTRIAL PRETREATMENT REQUIREMENTS

The permittee has an active, approved industrial pretreatment program. The permit includes standard conditions requiring implementation and enforcement of the existing program.

10. ADMINISTRATIVE ORDERS (AO) AND CONSENT ORDERS (CO)

This facility has entered into a consent order (OGC File No. 06-2097-17-DW), effective November 3, 2006, with the Department, which includes a schedule of compliance to reduce inflow and infiltration (I & I).

After review of the permittee's monthly Discharge Monitoring Reports (DMRs) for 2004 and 2005 for the WWTP, the violations of the permittee's effluent limits and/or Department rule were found for total nitrogen, TSS, CBOD₅, TP, DO, Toxicity, total recoverable copper and total recoverable iron.

According to the permittee, while inflow and infiltration (I&I) of stormwater into the collection system causes increased flows at the WWTP, permittee believes that this increased flow could be accommodated and Total Suspended Solids (TSS) violations would be avoided if the level of solids at the WWTP were reduced and more effectively managed.

Permittee has been actively pursuing ways to reduce I&I for many years and efforts are ongoing. Additionally, Permittee notes that replacement of a belt conveyor with two screw conveyors and reprogramming of the sludge dryer will aid in the efficiency of removing solids by enabling the WWTP to haul dewatered sludge and dry sludge at the same time. Additionally, Permittee has purchased a fourth centrifuge to provide more reliability in the sludge dewatering process. According to a letter dated October 17, 2005, from Permittee, during an August 25, 2005 ECUA Board meeting, three million dollars has been budgeted for Fiscal Year 2006 I&I repairs.

11. REQUESTED VARIANCES OR ALTERNATIVES TO REQUIRED STANDARDS

No variances were requested for this facility.

12. DISCUSSION OF PREVIOUS PERMIT EFFLUENT OR RECLAIMED WATER LIMITATIONS.

For Surface Water Serial Number D-001:

Parameters	Effluent or Reclaimed Water Limitations					
	Units	Maximum/ Minimum	Annual Average	Monthly Average	Weekly Average	Single Sample
Flow	MGD	Maximum	20.0	Report	-	-
CBOD5	mg/L	Maximum	8.0	8.0	12.0	16.0
Total Nitrogen	mg/L	Maximum	7.0 (<16.5 MGD)	7.0	10.5	14.0
Total Nitrogen	mg/L	Maximum	6.0 (≥16.5 MGD)	6.0	9.0	12.0
Total Phosphorus	mg/L	Maximum	1.0	1.0	1.5	2.0
TSS	mg/L	Maximum	8.0	8.0	12.0	16.0
Dissolved Oxygen	mg/L	Minimum	-	-	-	4.0
Dissolved Oxygen	mg/L	Minimum Daily Avg.	-	-	-	5.0
pH	S.U.	Range	-	-	-	6.5 – 8.5
Fecal Coliform	#/100ml	Maximum	200.0	-	-	800.0
Mercury, Total Recoverable	ug/L	Maximum	-	-	-	0.025
Silver, Total Recoverable	ug/L	Maximum	-	-	-	2.3
Iron, Total Recoverable	mg/L	Maximum	-	-	-	0.3
Zinc, Total Recoverable	ug/L	Maximum	-	-	-	86.0
Copper, Total Recoverable	ug/L	Maximum	-	-	-	2.9
Nickel, Total Recoverable	ug/L	Maximum	-	-	-	8.3
Lead, Total Recoverable	ug/L	Maximum	-	-	-	5.6
Total Recoverable Phenol Compounds	mg/L	Maximum	-	-	-	0.3
Ultraviolet Intensity	mW/cm ²	Report	-	-	-	Report
Wastewater Transmittance	%	Report	-	-	-	Report
Fecal Coliform Bacteria (Prior to UV)	#/100mL	Report	-	Report (Mo. Avg)	-	-
UV Dosage	mWs/cm ²	Report	-	-	-	Report

13. NEW OR EXPANDED DISCHARGES TO SURFACE WATERS; ANTIDegradation REQUIREMENTS

This facility does not have a new or expanded discharge.

14. EFFECTS OF SURFACE WATER DISCHARGE ON THREATENED OR ENDANGERED SPECIES

The Department does not anticipate adverse impacts on threatened or endangered species as a result of permit issuance.

15. APPLICABLE RULES

The following were used as the basis of the permit limitations/conditions:

a. FAC refers to various portions of the Florida Administrative Code.	
The effective dates of FAC Rule Chapters cited in the table are as follows:	
<u>Chapter</u>	<u>Effective Date</u>
62-4	05-01-03
62-160	04-09-02
62-302	05-15-02
62-520	12-09-96
62-522	08-27-01

62-550	05-28-03
62-600	12-24-96
62-601	12-24-96
62-602	02-06-02
62-610	08-08-99
62-620	08-25-03
62-625	01-08-97
62-640	03-30-98
62-650	12-26-96
62-699	07-05-01
b. FS refers to various portions of the Florida Statutes	
c. CFR refers to various portions of the Code of Federal Regulations, Title 40	
d. BPJ refers to Best Professional Judgment	

16. DEPARTMENT CONTACT

Additional information concerning the permit may be obtained during normal business hours from:

Jonathan May
Engineering Specialist IV
Department's Northwest District Office
Florida Dept. of Environmental Protection
160 Governmental Center, Room 302
Pensacola, FL, FL 32502 - 5794
Telephone Number: (850) 595-8300
Fax Number: (850) 595-8393

17. THE ADMINISTRATIVE RECORD

The administrative record including application, draft permit, fact sheet, public notice (after release), comments received and additional information is available for public inspection during normal business hours at the location specified in item 16.

18. PROPOSED SCHEDULE FOR PERMIT ISSUANCE

Draft Permit to Applicant and EPA:	April 30, 2007
Beginning of Draft Permit Public Comment Period:	May 15, 2007
Notice of Agency Action:	June 30, 2007
Issuance Date of Permit:	June 30, 2007