1090 Union Road, Suite 280
West Seneca, NY 14224
T 716.204.9543
TRCcompanies.com

June 16, 2020
New York State Department of Environmental Conservation
625 Broadway
Albany, NY 12233-3505
Attention: BWP Permit Coordinator

Re: Danskammer Energy Center
Newburgh, New York
SPDES No. NY0006262

Dear Mr. Posner and Ms. Temple:

TRC, on behalf of Danskammer Energy, LLC (Danskammer), is submitting the enclosed application for its proposed repowering project to support an Article 10 application with the New York State Department of Public Service. Danskammer is proposing to construct a combined cycle generation facility on the southern portion of the site. After the proposed combined cycle plant is approved and constructed, but prior to commencing operations, Danskammer will cease operation of the existing Danskammer Generating Station. The new combined cycle plant will be designed to use existing Wastewater Treatment Buildings 1 and 2 for treatment of process water. The Project will be known as the Danskammer Energy Center upon approval.

This application seeks to permanently close outfalls that will no longer be used, and change wastewater and stormwater characteristics, flow rates and water sources at multiple outfalls throughout the site. Outfalls 001-003 and 007-009 will be permanently closed. These outfalls are associated with the existing Generating Station and will no longer discharge water once the repowering project is complete. Outfalls 06A, 011-014, 016 and 019 will not be modified and will continue to discharge the same type of wastewater or stormwater as permitted by the existing SPDES permit. Flow rates for wastewater Outfalls 06A & 019 were estimated using existing discharge monitoring data for the past 12 months (April 2019 through March 2020). Flow rates for stormwater Outfalls 011-014 were estimated using the Water Quality Volume (WQV) calculation and outfall drainage areas shown on Figure 2 – Facility Features Diagram. Outfall 016 will continue to operate as currently permitted. Outfalls 004 through 006, 017, and 018 will be modified in order to discharge process water, treated sanitary wastewater, and stormwater from the proposed repowering project. The proposed modifications to Outfalls 004 through 006, 06A, 017 and 018 are detailed below.

At Outfall 004, the wastewater type is proposed to be changed from Non-Contact Cooling Water to Fire Protection System Testing. After the existing Generating Station has been decommissioned, Danskammer will continue to test the fire protection system within the existing Station on a weekly basis. The test will last approximately 30 minutes and the fire protection system pump will run at an average of 50 gallons per minute (GPM) (maximum pump capacity is 200 GPM). As part of the repowering project, Danskammer will reconfigure the drainage system within the building so that all fire protection system testing waters are discharged to Outfall 004.

At Outfall 005, the wastewater type will continue to be sanitary wastewater. However, the flow rate and treatment system will be changing. The potable water uses for the existing Generating Station will be 0.2 GPM and 0.4 GPM for the Danskammer Energy Center. Potable water will continue to be provided by the Town of Newburgh. A new package sewage treatment system will be installed as part of the

repowering project with a design flow rate of 5,000 gallons per day (GPD). This system will provide ample capacity for the treatment of sanitary wastewater generated at both the existing Generating Station and the Danskammer Energy Center.

At Outfall 006, the types of process wastewater, flow rates, and water sources will be changing compared to what is currently permitted. The combined cycle plant will be configured to direct all process wastewater discharges from the service water system and demineralizer system to Wastewater Treatment Building 1. An average of 7,200 GPD of process wastewater from miscellaneous service water uses and equipment and floor drain discharges from the combined cycle plant will come from the service water system. Process wastewater from the demineralizer system includes an average of 21,800 GPD of ultra-filtration backflush water and 39,200 GPD of reject water from the reverse osmosis system. The Town of Newburgh will be the water source for the service water system and demineralizer system. Batch treatment of process water in the Treatment Basin at Wastewater Treatment Building 1 will continue on an as needed basis and be discharged from Outfall 06A.

As part of the repowering project, an auxiliary area is being added at the Site where the former reserve coal pile area is currently located. The auxiliary area will store back-up ultra-low sulfur diesel (ULSD) for the combined cycle plant and a water treatment facility to demineralize water for the combined cycle plant cooling system. As shown on Figure 3 of the enclosed application, stormwater from the auxiliary area will be discharged from the southeast corner through a new culvert pipe. The discharge end of this pipe will be the new location of Outfall 017. Stormwater from the pipe will then be directed into a ditch that runs southeast towards a culvert under the railroad tracks where it will discharge to the Hudson River. Due to this change, the wastewater type for Outfall 017 will be changed from "stormwater from the former reserve coal pile area" to "stormwater from the auxiliary area." The flow rates for Outfall 017 have been estimated using the Water Quality Volume (WQV) formula. The approximate drainage area acreage of Outfall 017 is included on Figure 2 within the enclosed application. Fire protection system testing will also be discharged through Outfall 017. Fire protection system testing is estimated to occur once a year. During this testing, approximately 60,000 gallons of water will be used to test the system at the Auxiliary Area. This one-time discharge has been averaged over the course of a year and is listed in GPD in Section 2 of the application. Danskammer is proposing to keep the same water quality monitoring parameters for the outfall as currently permitted.

At Outfall 018, the wastewater type is proposed to be changed from "stormwater runoff – precipitator area" to "stormwater runoff – combined cycle plant." As part of the repowering project the combined cycle plant, administration building, air cooled condensers, and other associated structures will be constructed southwest of the existing precipitator area. A series of stormwater catch basins and subsurface piping has been designed to collect all stormwater within this area and will tie into the existing stormwater collection system for discharge through Outfall 018 as shown on Figure 4 of the enclosed application. The flow rates for Outfall 018 have been estimated using the WQV formula. The approximate drainage area acreage of Outfall 018 is included on Figure 2. Fire protection system testing waters will also be discharged through Outfall 018. Fire protection system testing at the combined cycle plant area is estimated to occur once per year and use 60,000 gallons of water. This one-time discharge is separate from the fire protection system testing at the Auxiliary Area and has been averaged over the course of a year and is listed in GPD in Section 2 of the application. Danskammer is proposing to keep the same water quality monitoring parameters for the outfall as currently permitted.

If you have any questions regarding the information presented in the attached application package, please feel free to contact me at (716) 289-2409 or KMcCormick@trccompanies.com.

Sincerely,

Kaitlin McCormick
Senior Project Manager

Enclosure

cc: Jan Garcia, Danskammer
Nick Gier, TRC