Dominion Resources Services, Inc. 5000 Dominion Boulevard, Glen Allen, VA 23060

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CERTIFIED MAIL RETURN RECEIPT REQUESTED

February 11, 2015

Ms. Susan Mackert Virginia Department of Environmental Quality Northern Regional Office 13901 Crown Court Woodbridge, VA 22193

RE: Possum Point Power Station VPDES Permit No. VA0002071:

Concept Engineering Report for the Internal Outfall 503 Wastewater Treatment System

Dear Ms. Mackert:

Enclosed is a Concept Engineering Report (CER) that describes the wastewater treatment system (WTS) that Dominion is planning to utilize to treat wastewaters generated during the ash pond closure project at the Possum Point Power Station. Wastewater treated by the WTS will be discharged through internal Outfall 503 to VPDES permitted Outfall 001/002 and, consequently, the WTS has been designed to ensure compliance with applicable effluent limitations.

This CER is being submitted in accordance with Special Condition I.F.22 of the subject permit and, as such, we are seeking DEQ approval of the CER so that we might construct and begin utilization of this treatment system as proposed.

Please contact Ken Roller of my staff at (804) 273-3494 or by email at <u>kenneth.roller@dom.com</u> should you have any questions or require additional information about this transmittal.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations

Sincerely,

Cathy C. Taylor

Director, Electric Environmental Services

ec: Bryant Thomas: <u>bryant.thomas@deq.virginia.gov</u>

Susan Mackert: susan.mackert@deq.virginia.gov



Concept Engineering Report Internal Outfall 503 Wastewater Treatment System

Virginia Electric and Power Company Possum Point Power Station Coal Combustion Residual Surface Impoundment Closures Dumfries, Virginia

GAI Project Number: C150132.00

February 2016



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Virginia Electric and Power Company
Possum Point Power Station
Coal Combustion Residual Surface Impoundment Closures
Dumfries, Virginia

GAI Project Number: C150132.00

February 2016

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Table of Contents

1.0	Project	Overview
	1.1	Introduction,
	1.2	Project Description
		1.2.1 Interim Configuration Phase
	1 2	1.2.2 Final Configuration Phase
	1.3	Location and Description of Selected Project Facilities
		1.3.2 Ash Pond D
		1.3.3 Ash Pond E
		1.3.4 Metals Cleaning Waste Treatment Facility
2.0	Interna	Outfall 503 Wastewater Sources
4.0	2.1	Interim Configuration Phase During Construction
		2.1.1 Ash Pond D Comingled Process Water
		2.1.2 Dewatering and Contact Waters (Ponds A, B, C, D and E)
3.0	Wastew	rater Characteristics
4.0		ility of Wastewater
5.0		rater Treatment System Design Approach and Methods
	5.1	Treatment System Description
		5.1.1 Aeration Tanks
		5.1.3 Settling Tank with Geotubes
		5.1.4 Backwashing Sand Filters
		5.1.5 Bag Filters
		5.1.6 Activated Alumina
		5.1.7 Weak Acid Cation Exchange
		5.1.8 pH Adjustment/Dechlorinating
	5.2	5.1.9 Post Ion Exchange Bag Filters
	5,2	Treated Wastewater Discharge
Table	1	Possum Point Pond D Comingled Water Compared With VPDES Permit Limits for Internal Outfall 503
Table	2	Possum Point Dewatering Water Compared With VPDES Permit Limits for Internal Outfall 503
Table	3	Possum Point Contact Water Compared With VPDES Permit Limits for Internal Outfall 503
Table	4	Identified Constituents for Which Treatment may be Necessary in Order to Comply with VPDES Permit Limits
Figure		Station Outfalls & Treatment Facilities
Figure	2	Process Flow Diagram for Interim Configuration Phase During Construction
Figure	3	Treatment Process for Interim Configuration Phase During Construction
Figure	: 4	Site Plan for Interim Configuration Phase During Construction



Table of Contents (Continued)

Appendix A Supporting Literature

Appendix B Conceptual Treatment System Design Basis and Equipment General Arrangement

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1.0 Project Overview

1.1 Introduction

Virginia Electric and Power Company d/b/a Dominion Virginia Power (Dominion) is in the process of implementing a long-term strategy for closure of its existing coal combustion residual (CCR) ash ponds at Possum Point Power Station (Station), an 1,845 megawatt natural gas and oil fired (previously coal-fired) steam electric generating station near Dumfries, Prince William County, Virginia (VA).

1.2 Project Description

Dominion is currently working to close five existing ash ponds at the Station: Ash Ponds A, B, C, D, and E. All five ponds are scheduled for closure by April 2018 in accordance with the relevant provisions of the United States Environmental Protection Agency's CCR rule, which was published on April 17, 2015, and codified in 40 Code of Federal Regulations (CFR) Part 257, Subpart D. A drawing showing the site location is shown in Figure 1.

Ash Ponds A, B, and C were originally three contiguous ponds that have been inactive since the 1960s. Ash Ponds A, B, C, and E have been decanted and are being dewatered until all ash material has been removed, in accordance with applicable state and local requirements. Dredged ash material from the ponds was initially transported to Ash Pond D for storage. Diversion of dredged ash to Ash Pond D ceased in October 2015; since then, all remaining ash has been and will continue to be hauled to a permitted landfill for disposal.

Ash Pond D is scheduled to be decanted, dewatered, regraded, capped, and closed in the coming months. During the decanting and dewatering process, water from Ash Pond D will be treated and discharged to Outfall 001/002 via Internal Outfall 503. Following dewatering, Ash Pond D will be converted to a single regulated solid waste facility subject to all applicable state and federal closure and post-closure care requirements.

The purpose of this document is to identify conceptual treatment and handling/discharge options for wastewater produced during the Interim Configuration Phase of the ash pond closure project. The proposed conceptual treatment system has been designed to meet discharge requirements at Internal Outfall 503 as specified by the recently modified VA Pollutant Discharge Elimination System (VPDES) Permit No. VA0002071. Development of the proposed conceptual treatment system was based on best engineering judgement using water quality data presented in this report. The planned conceptual treatment may not reflect all of the specific details of the final treatment system. The installed treatment system will be reviewed by a Professional Engineer for conformance to the design intent of this Concept Report and a certification will be provided to the VA Department of Quality (VDEQ).

Closure of Ash Ponds A, B, C, D, and E will be performed in two phases as described below:

1.2.1 Interim Configuration Phase

The active construction phase (i.e., "Interim Configuration") incorporates all activities associated with closing the ponds, including dredging, dewatering, capping, and closing. During this phase, wastewater from several sources will be routed to Ash Pond D for storage. Ash Pond D will then be decanted, dewatered, capped and closed. Treatment applied to all Decant, Contact and Dewatering Water collected during this process prior to discharge will include flocculation/precipitation/settling, filtration and adsorption (as needed). Definitions of Decant, Contact and Dewatering Water are included in Sections 2.1.1 and 2.1.2 of this report. Please refer to Figures 2 and 3, Appendix B, and the following sections of this report for details of the conceptual treatment system.



1.2.2 Final Configuration Phase

The post-construction phase (i.e., "Final Configuration") incorporates all activities following completion of the Interim Configuration Phase. Treatment during the Final Configuration Phase will be applied to capped ash pond underdrainage, existing metal cleaning wastewater, and ash pond toe drain discharge. Treatment of discharges generated during the Final Configuration Phase will be addressed in a future Concept Engineering Report.

1.3 Location and Description of Selected Project Facilities

Descriptions of all facilities associated with the Interim Configuration phase and their relative locations are provided in the following sections. All facility locations and descriptions are based on pre-construction conditions.

1.3.1 Ash Ponds A, B, and C

Ash Ponds A, B, and C are located approximately 2,100 feet south of Ash Pond D, on the eastern bank of Quantico Creek. These ponds were actively used from the period between 1955 and the early 1960s.

Dominion plans to close Ash Ponds A, B, and C by removing all ash in the impoundments. Initially, dredged ash material from Ash Ponds A, B, and C was moved to Ash Pond D for storage. Transport of dredged ash materials from Ash Ponds A, B, and C to Ash Pond D for storage ceased in October 2015. Remaining ash material will be hauled to a permitted landfill for disposal. During closure construction activities, all Contact and Dewatering Water generated from Ash Ponds A, B, and C will be filtered and then diverted to Ash Pond D for temporary storage. Contact and Dewatering Water conveyed from Ash Ponds A, B, and C to Ash Pond D for storage was filtered for removal of CCR material beginning in October 2015.

1.3.2 Ash Pond D

Ash Pond D is the largest ash pond on the facility grounds and was constructed to provide storage for ash produced during coal-fired generation of electricity. Ash Pond D presently receives stormwater runoff from the surrounding watershed and filtered Contact and Dewatering Water from Ash Ponds A, B, C and E. Ash Pond D was previously authorized under the VPDES permit to discharge to Ash Pond E. There is currently no discharge from Ash Pond D.

Wastewaters from several sources are being or have been diverted to Ash Pond D for temporary storage. Wastewater sources include Decant Water, Dewatering and Contact Waters from Ash Ponds A, B, C, and E, as well as wastewater from the Station's Metals Cleaning Waste Treatment Facility (Outfall 501) and Oily Waste Treatment Basin (Outfall 502). All waters that have been collected in Ash Pond D prior to commencement of the dewatering process are collectively referred to as "Ash Pond D Comingled Process Water" for the duration of this report. Beginning in October 2015, Dewatering and Contact Water from Ash Ponds A, B, C, and E were filtered for removal of CCR material prior to being conveyed to Ash Pond D for storage.

1.3.3 Ash Pond E

Ash Pond E is located approximately 1,400 feet west of Ash Pond D. This pond was historically used as a day-to-day onsite ash pond. Following cessation of ash generating operations, the pond served as a final treatment system for various stormwater and process wastewaters generated by the Station. When active, Ash Pond E discharged via a riser structure to Outfall 005 in accordance with the VPDES permit.



Ash Pond E was decanted beginning in March 2015, prior to the initiation of the Ash Pond E dredging activities. A portion of the initial Decant Water was discharged via Outfall 005 in accordance with the VPDES permit. In April 2015, the riser structure was sealed and the remainder of the Decant Water was pumped to Ash Pond D. No discharges from Ash Pond E have occurred since the sealing of the riser structure in April 2015. Ash material was mechanically dredged from Ash Pond E to Ash Pond D from June 2015 to October 2015. All remaining ash material in Ash Pond E will be hauled to a permitted landfill for disposal.

1.3.4 Metals Cleaning Waste Treatment Facility

The Metals Cleaning Waste Treatment Facility consists of two lined ponds in series that accept and treat wastewater generated by the cleaning of the Station's boilers and other equipment. Treated effluent from the Metals Cleaning Waste Treatment Facility has historically been discharged to Ash Pond E via Internal Outfall 501 in accordance with the VPDES permit. The pond currently receives stormwater and batch wastewater streams from cleaning/flushing activities at the following facilities:

- Boiler;
- Preheater;
- Economizer;
- · Precipitator; and
- Associated piping.

The source for all cleaning/flush waters is raw, untreated water from the Potomac River. In 2015, the Outfall 501 discharge was routed to Ash Pond E for storage prior to dredging. Subsequently, Outfall 501 was routed to Ash Pond D for storage in mid-April 2015. The Station does not anticipate any metals cleaning waste discharges to the Metals Cleaning Waste Treatment Facility in the immediate future. The Metals Cleaning Waste Treatment Facility is presently being considered as an option for temporary storage following treatment of waters associated with the Pond Closure Project.

2.0 Internal Outfall 503 Wastewater Sources

2.1 Interim Configuration Phase During Construction

During the Interim Configuration Phase several wastewater sources will be temporarily diverted to Ash Pond D for storage. In the event the storage location in Ash Pond D must be moved to allow for the construction of the cap system in Pond D, the wastewater may be held in temporary ponds in Pond E or A, B, C prior to being pumped to the conceptual treatment system, as shown on Figure 4. For the purpose of describing the treatment process in this report, it has been assumed that all wastewater will be stored in Ash Pond D prior to treatment.

All water sources collected in Ash Pond D will be conveyed to a treatment system that may include a temporary holding basin and will ultimately be discharged to Outfall 001/002 via Internal Outfall 503. Beginning in October 2015, Contact and Dewatering Water from Ash Ponds A, B, C, and E was, and will continue to be, filtered for removal of CCR material prior to being conveyed to Ash Pond D for storage or directly to treatment.

The following sections describe each source of wastewater that will contribute to the Ash Pond D Dewatering Water during the Interim Configuration Phase. Collected wastewaters will be treated prior to discharge via Internal Outfall 503.



2.1.1 Ash Pond D Comingled Process Water

As described in previous sections, Ash Pond D has received and stored ash, Dewatering Water and Contact Water from Ponds A, B, C, and E, as well as discharges from Internal Outfall 501 (Metal Cleaning Waste Treatment Facility) and Internal Outfall 502 (Oily Waste Treatment Basin). Decant water from Ash Pond E was also transferred to Ash Pond D beginning in April 2015. Conveyance of dredged ash material from Ash Ponds A, B, C, and E to Ash Pond D for storage ceased in October 2015. Remaining ash from these ponds will be hauled to a permitted landfill for disposal.

Discharge from Internal Outfall 501 will be stopped during the Interim Configuration Phase, Discharge from Internal Outfall 502 was initially conveyed to Ash Pond D for storage but has since been rerouted to permanently discharge via VPDES permitted Outfall 004 in accordance with the VPDES permit. No ash from any pond has been placed in Ash Pond D since October 2015.

The combined wastewater from multiple sources that is collected in Ash Pond D is referred to as Ash Pond D Comingled Process Water. Due to the large storage capacity of Ash Pond D, comingled waters have been given time for blending and settling of larger suspended solids.

Ash Pond D Comingled Process Water samples were collected for water quality analysis on November 6 and November 13, 2015. These data were generated to establish the quality of the Comingled Process Water prior to treatment. Laboratory data for Ash Pond D Comingled Process Water compared with VDEQ permit limits for Internal Outfall 503 during the Interim Configuration Phase are shown in Table 1.

During the Interim Configuration Phase, Decant Water refers to all water from Ash Pond D that sits above the level of the settled ash at the bottom of the pond. Decant Water includes all Ash Pond D Comingled Process Water, and it is anticipated that Decant Water will require sedimentation and filtration treatment prior to discharge in order to comply with VPDES permit limits. An adsorption and/or ion exchange treatment process will be used for treatment of Decant Water as necessary to meet such limits.

2.1.2 Dewatering and Contact Waters (Ponds A, B, C, D and E)

Dewatering Water refers to wastewater that is produced from the dewatering of the ash in order to stabilize it and allow for its removal by mechanical dredging (Ponds A, B, C, and E) or its grading for the construction of a cap system (Pond D). During the Interim Configuration Phase, Dewatering Water from Ash Ponds A, B, C, D, and E will be collected by the installation of wells to pump water out of the ash and the excavation of trenches to drain the ash. During the Interim Configuration Phase, additional wastewater flows that include Dewatering and Contact Waters from Ponds A, B, C, and E will continue to be filtered for removal of CCR material and diverted to Ash Pond D for storage.

Dewatering Water samples from Ash Pond E were collected from several locations in May and July 2015. Sampling locations included Ash Pond E Rim Ditches and Well Discharge points. Additionally, a sample of Dewatering Water from Ash Pond E was collected by the Prince William County Service Authority (PWCSA) for separate analysis. These water samples were collected to evaluate typical water quality parameters to be expected during dewatering of Ash Pond D. Dewatering Water quality data prior to any treatment compared with VPDES permit limits for Internal Outfall 503 during the Interim Configuration Phase are shown in Table 2. It should be noted that all water from Ponds A, B, C and E will be filtered prior to transfer to Ash Pond D. Consequently the water quality data in Table 2 likely overestimate actual concentrations that will be present following transfer to Ash Pond D.



Contact Water refers to all stormwater that comes in contact with ash. Contact Water must be removed from the working areas to close the ponds. All Contact Water from Ash Ponds A, B, C, and E is currently being filtered and diverted to Ash Pond D for storage, in accordance with the VPDES permit.

A Contact Water sample was collected from Ash Pond E on May 5, 2015. This sample was collected to evaluate typical water quality parameters to be expected from additional Ash Contact Water prior to treatment generated during the Interim Configuration Phase. Water quality data for Ash Pond E Contact Water compared with VPDES permit limits for Internal Outfall 503 during the Interim Configuration Phase are shown in Table 3. Again it should be noted that all water from Ponds A, B, C and E will be filtered prior to transfer to Ash Pond D. Consequently the water quality data in Table 2 likely overestimate actual concentrations that will be present following transfer to Ash Pond D.

In addition to sedimentation and filtration, adsorption and/or ion exchange treatment processes will be used as necessary to meet VPDES permit limits.

3.0 Wastewater Characteristics

Water samples were collected prior to filtration from each source that has been diverted to Ash Pond D for the dewatering process; as well as Comingled Water in Ash Pond D. Wastewater sources that were sampled included Ash Pond D Comingled Process Water, Pond E Ash Contact Water, and Pond E Dewatering Water. Samples were tested by an analytical laboratory for metals, total suspended solids, and other constituents that are regulated by the VPDES permit. Results from laboratory analyses are shown in Tables 1 through 3. Each of these tables includes applicable VPDES permit limits as a basis of comparison.

Based on the data presented in Tables 1 through 3, the following constituents have been identified as having at least one sample concentration close to or exceeding VPDES permit limits:

- > Total Selenium;
- Total Suspended Solids:
- Total Nickel;
- ▶ Total Thallium;
- Total Arsenic:
- Total Copper; and
- Total Lead.

A summary of observed concentrations of these constituents and the related sampling locations are shown in Table 4. These samples are representative of raw, untreated wastewater from sources that include Ash Pond D Comingled Process Water as well as Dewatering and Contact Water samples from Ash Pond E. Samples from Ash Pond E were evaluated in order to assess expected constituent concentrations once Decant Water has been removed from Ash Pond D and intake to the treatment system is entirely composed of Contact Water and Dewatering Water.

4.0 Treatability of Wastewater

Unit processes that have been incorporated into the conceptual treatment system include aeration, ferric chloride flocculation/precipitation/settling, filtration, alumina adsorption, and weak acid cation (WAC) exchange. An aeration step has been incorporated to facilitate the oxidation of metals prior to injecting with a flocculant. The chemical addition and flocculation step includes pH adjustment as



needed, as well as injection of ferric chloride and a polymer to enhance coagulation. Addition of sodium hypochlorite is also provided as required in the event chemical oxidation of arsenic is needed should addition of ferric chloride not be sufficient. The formed flocs are collected in the sediment tanks equipped with geotubes to dispose of collected solids. A filtration step allows for pretreatment and removal of fines prior to the optional metals polishing step. Alumina adsorption and WAC exchange will be used as necessary to meet VPDES permit limits.

Adsorption using activated alumina has been incorporated into the conceptual treatment system to further reduce dissolved arsenic and selenium concentrations following ferric chloride flocculation/oxidation/settling and filtration. According to the American Water Works Association's "Water Quality and Treatment: A Handbook of Community Water Supplies," activated alumina can be used for removal of both arsenic and selenium, with suggested removal efficiencies ranging from 60 to 100 percent. Additionally, the Environmental Protection Agency has identified activated alumina as a best available technology for thallium removal and as a suitable treatment technology for arsenic removal.

Treatment with a WAC exchange resin was selected for additional removal of heavy metals as needed following flocculation/oxidation/settling, filtration, and activated alumina adsorption. At low metals concentrations similar to those observed in the Decanting, Contact and Dewatering Water samples, both weak and strong acid cation (SAC) exchange resins are capable of removing heavy metals. WAC exchange resins are recommended for applications where a variety of different heavy metals must be removed. WAC exchange resins offer an advantage over SAC exchange resins in terms of lower anticipated regeneration frequency while providing removals of targeted trace metals.

Technical literature that supports the use of the above processes for removal of constituents regulated by the VPDES permit has been included in Appendix A of this report. Unit processes were selected to produce a treated effluent that is in compliance with VPDES permit limits.

5.0 Wastewater Treatment System Design Approach and Methods

5.1 Treatment System Description

All accumulated water in Ash Pond D (Decant, Contact Water, and Dewatering Water) will be treated for removal of total suspended solids and other contaminants prior to discharge via Outfall 001/002. All Ash Pond D Decant/Contact/Dewatering Water and contributing wastewater sources will be conveyed to a multiple stage treatment system. Adsorption and/or ion exchange treatment processes will be used as necessary to meet VPDES permit limits. Effluent discharge from the treatment system will be discharged to Outfall 001/002 via Internal Outfall 503 either directly from the treatment system or after treatment and storage in a temporary holding basin. A process flow diagram showing the routing of all wastewater for treatment and discharge to Outfall 001/002 is shown in Figure 2.

A conceptual treatment system is proposed for reduction of total suspended solids, metals concentrations, and other constituents prior to discharge to Internal Outfall 503. The system is designed for compliance with the effluent limits established in the VPDES permit and is based on water quality samples representative of the wastewater that will be generated during the pond closure project. A treatment process diagram illustrating the conceptual treatment components during the Interim Configuration Phase During Construction is shown in Figure 3. The conceptual treatment system design basis and Equipment General Arrangement are included in Appendix B.

During the dewatering process, water will be drawn from Ash Pond D at a maximum flow rate of 2.88 MGD (2,000 gpm) per the VPDES permit. The dewatering process will be capable of operating 24 hours a day, seven days a week until completed.



Influent will be directed to aeration tanks equipped with blowers. Aeration will be applied to the influent wastewater, as needed, to enhance oxidation of dissolved metals. The water will then be conveyed to two automated chemical addition/injection trailers for injection of ferric chloride to produce iron flocs for the removal of metals, polymeric flocculation aid to enlarge the iron flocs for increased metal removal, and hydrochloric acid or caustic soda for pH adjustment, as needed. Sodium hypochlorite may also be injected as an oxidizing agent in case arsenic removal is not achieved through application of ferric chloride. Final product selection of polymeric flocculation aid shall be identified from jar testing. After chemical addition/flocculation, the water will be pumped into a settling basin that includes geotubes.

Two transfer pumps will direct the water from the settling tanks to backwashing sand filter skids and bag filters in order to remove coarse and fine suspended sediment that passes through the settling basins/geotubes. After filtration, supplemental treatment processes will be used as necessary to meet effluent limits in the VPDES permit. The first stage of supplemental treatment is activated alumina adsorption for removal of dissolved selenium and arsenic. After passing through the activated alumina adsorption vessels, water may be conveyed to vessels with cation exchange resins for final polishing of targeted metals. The pH of the polished water may be adjusted with hydrochloric acid or caustic soda and dechlorinated with sodium sulfite as needed. Then the treated water will be discharged via the effluent pump to Internal Outfall 503 (or first to a temporary holding tank or basin then to Internal Outfall 503), and finally Outfall 001/002. Also, the sludge from the settling basins/geotubes will be hauled offsite for disposal in a permitted landfill.

Upon initial startup of the treatment system, treated effluent will be diverted back to Ash Pond D until the treatment system's efficacy has been established. Once treatment system effluent concentrations of regulated constituents have reached levels that are compliant with the VPDES permit limits, effluent will be diverted to Outfall 503 for discharge.

Specific unit processes are further described as follows.

5.1.1 Aeration Tanks

Aeration is provided via four 21,000-gallon tanks equipped with 40-hp blowers for mixing and initial pre-treatment/oxidation of metals.

5.1.2 Chemical Addition

The chemical addition/injection trailers will have automatic injection capabilities for coagulation, flocculation, oxidation, and pH adjustment. There will be two 10 gph injection pumps to provide ferric chloride and polymeric flocculation aid. It is estimated that ferric chloride will be injected at an initial dosage of 10 ppm, and that this dosage will be adjusted as necessary based on jar testing and/or actual performance. Required injection rates of the 20 percent by weight solution are estimated to be 4.2 and 3.7 gph at 2,000 and 1,750 gpm, respectively. Injection dosage and exact polymer to be injected for flocculation are still to be determined from jar testing. Injection for pH adjustment will be either hydrochloric acid, for lowering pH, or caustic soda, for raising pH levels, as needed. The pH adjustment will be incorporated prior to the settling basin/geotubes, as necessary. Dosage of the sodium hypochlorite oxidizing agent may be recommended should arsenic not be removed with ferric chloride flocculation, or if ferrous iron overwhelms the ion exchange resins. The trailers will also include an inline static mixer after chemical injection. Flocculation will also be provided in the chemical addition/injection trailers.



5.1.3 Settling Tank with Geotubes

A 125-foot-diameter tank equipped with geotubes provides flocculation and settling/removals of flocs. An alternate size tank, or weir tanks, may be provided based on area requirements for the treatment system. The flocs/sludge collected in the settling tank and geotubes is to be hauled offsite for disposal in a permitted landfill.

5.1.4 Backwashing Sand Filters

The proposed sand filter system consists of six Carbonair Model 4-54 sand filters in parallel. Each model contains four 54-inch-diameter filters. Each sand filter unit will be backwashed with treated water for ten minutes at a backwashing rate of approximately 250 gpm. During this backwashing period the total flow rate through all six of the sand filter units should be reduced to approximately 1,500 gpm. The sand filters are equipped with automated backwashing capabilities, and backwashing will be triggered when a differential pressure setpoint is exceeded. Backwash water can then be recycled to Ash Pond D for settling.

5.1.5 Bag Filters

The proposed bag filter system consists of four Krystil Klear Multi-Round Model 3636 bag filter housings in parallel. The bag filters have initially been selected with 0.5-micron nominal openings. Alternate opening sizes may be selected depending on treatment needs. Spent bag filters will be hauled offsite for disposal in a permitted landfill.

5.1.6 Activated Alumina

The proposed activated alumina system includes four Carbonair PC78 vessels in parallel. Each vessel includes 500 cu. ft. (20,000 lbs) of granular activated alumina. Assuming all dissolved arsenic is removed from pre-treatment upstream, the four vessels are expected to last through approximately 598.4 million gallons of water or 208 days of continuous operation at 2,000 gpm. Granular activated alumina will be replaced as needed.

5.1.7 Weak Acid Cation Exchange

Based on process water quality analyses, water may be conveyed to additional adsorption and/or ion exchange treatment processes to provide additional selective constituent removals (e.g., aluminum, barium, trivalent chromium, copper, iron, lead, nickel, thallium, zinc, etc.), as necessary to meet effluent limits in the VPDES permit. The proposed WAC exchange system consists of four vessels in parallel. These vessels will be filled with 600 cu. ft. (28,000 lbs) of cation exchange resin specific to the desired metals removals. The resin usage rate is predicted to be approximately 40 cu. ft. per million gallons of water. All four vessels are predicted to require change-out every 60 million gallons of water or after 20 days of continuous operation at 2,000 gpm.

5.1.8 pH Adjustment/Dechlorinating

Following removal of metals through ion exchange and/or adsorption, treated water will be adjusted for pH again using hydrochloric acid or caustic soda as needed. Sodium sulfide may be added for dechlorinating the water if sodium hypochlorite is used as an oxidizing agent. Dosage for sodium sulfide is to be determined based on sodium hypochlorite dosages.



5.1.9 Post Ion Exchange Bag Filters

Following removal of metals through ion exchange and/or adsorption, treated water will pass through one-micron nominal high efficiency bag filters as a preventative measure to catch sloughed off particulates from the ion exchange unit processes. Spent bag filters will be hauled offsite for disposal in a permitted landfill.

5.2 Treated Wastewater Discharge

Treated wastewater will be routed to Internal Outfall 503 and ultimately Outfall 001/002 for discharge into Quantico Creek. This will require construction of a pipeline to divert water from the conceptual treatment system to Internal Outfall 503 and to Outfall 001/002. Prior to discharge to Internal Outfall 503, treated wastewater may be diverted to temporary holding basins or tanks. This storage volume will allow the Station to verify that chemical parameters meet the effluent limitations specified by the VPDES permit prior to discharging to Internal Outfall 503. Potential locations for the treatment system and temporary storage are shown on Figure 4. An alternative location for the treatment system and temporary storage may be selected as dictated by closure activities at the Station. For treated water storage use of the lined Metals Cleaning Waste Treatment Facility Ponds or Frac Tanks are included as potential options.

If the Metals Cleaning Waste Treatment Facility/Ponds are utilized as a temporary storage location, the ponds will be temporarily taken offline and not used for storage associated with Outfall 501. If the Station needs to conduct metals cleaning operations when the ponds are offline, a frac tank or other Storage will be brought to the Station for storage of waters associated with Internal Outfall 501. Prior to use for temporary storage, the ponds will be emptied and cleaned. In addition, the existing liner system in the ponds will be visually inspected and approved for use by a Professional Engineer.



Concept Engineering Report Internal Outfall 503 Wastewater Treatment System Virginia Electric and Power Company Coal Combustion Residual Surface Impoundment Closures

TABLES



Table 1

Possum Point Pond D Comingled Water Compared with VPDES Permit Limits for Internal Outfall 503

Mercury, Dissolved	Mercury, Total	Lead, Dissolved	Lead, Total	Iron, Dissolved	Iron, Total	Copper, Dissolved	Copper, Total	Cobalt, Dissolved	Cobalt, Total	Chromium VI, Dissolved	Chromium VI, Total (3)	Chromium III, Dissolved (2)	Chromium III, Total	Chloride	Cadmium, Dissolved	Cadmium, Total	Boron, Dissolved	Boron, Total	Beryllium, Dissolved	Beryllium, Total	Barium, Dissolved	Barium, Total	Arsenic, Dissolved	Arsenic, Total	Antimony, Dissolved	Antimony, Total	Aluminum, Dissolved	Aluminum, Total	Oil and Grease (O&G)	Total Suspended Solids (TSS)	pH (1)	Parameters		
µg/L	µg/L	1/grl	µg/L	ug/L	ug/L	Hg/L	μg/L	ug/L	µg/L	1/6rt	µg/L	ug/L	ug/L	µg/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ng/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	ug/L	mg/L	mg/L	S.U.	Units		
N/A	1.2	N/A	14	N/A	N.	N/A	9.6	N/A	Z	N/A	17	N/A	88	370,000	N/A	1.4	N/A	¥.	N/A	N.	N/A	N.	N/A	240	N/A	1,300	N/A	NL	15	30	N/A	Monthly Average		
N/A	2.2	N/A	26	N/A	NL	N/A	18	N/A	Z	N/A	32	N/A	160	670,000	N/A	2.6	N/A	NL	N/A	NF	N/A	NL	N/A	440	N/A	1,300	N/A	NL	20	100	N/A	Daily Maximum	Internal (When Routed t	VPDES P
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	6.0	Minimum	Internal Outfall 503 - When Routed to 001/002 or 004	VPDES Permit Limits
N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	9.0	Maximum	04	
< 0.20	< 0.20	< 2.0	< 1.0	A	NA	< 5.0	1.9±	NA	Ą	0.12±	0.14±	< 10	< 10	73,600	< 1.0	< 0.50	NA	NA	NA	NA	NA	NA	16	17	4.1	4.1	NA	NA	4.0	< 5	7.97	11/6/15	Pond D 6A	
0.35	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	1.8±	NA	NA	±1T:0	0.14±	< 10	< 10	73,700	< 1.0	< 0.50	NA	NA	NA	NA	NA	NA	15	17	3.9	41	NA	NA	4.6	< 5	7.93	11/6/15	Pond D 68	
< 0.20	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	1.6±	NA	NA	0.12±	0.14±	< 10	< 10	74,100	< 1.0	< 0.50	NA	NA	NA	NA	NA	NA	15	15	4.0	3.8	NA	NA	5.0	< 5	7.86	11/6/15	Pond D 6C	
< 0.20	< 0.20	< 2.0	< 1.0	NA.	AIN	< 5.0	1.7±	¥	Ä	0.11±	0.13±	< 10	< 10	73,400	< 1.0	< 0.50	¥	Ä	NA.	NA	NA	NA	15	17	3.7	3.9	NA	NA.	5.9	< 5	7.94	11/6/15	Pond D 7A	
< 0.20	NA	< 2.0	NA	NA	NA A	< 5.0	Ą	Ą	Ą	< 0.25	0.086±	< 10	< 10	NA	< 1.0	NA	NA	NA	NA	NA	NA	NA	15	NA	4.1	NA	NA	NA	NA	NA	NA	11/13/15	Pond D 7A	Pond D C
< 0.20	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	0.97±	NA	NA	< 0.25	0.089±	< 10	< 10	75,500	<1.0	< 0.50	Ä	NA	NA	NA.	NA	NA	15	16	3.8	3.8	NA.	NA	0.51±	< 5	7.74	11/13/15	Pond D 78	Pond D Comingled Water
< 0.20	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	0.90±	NA	NA	< 0.25	0.086±	< 10	< 10	75,800	< 1.0	< 0.50	NA	NA	NA	NA	NA	NA	14	15	3.8	3.8	NA	NA	< 2.1	<5	7.85	11/13/15	Pond D 7C	
< 0.20	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	0.87±	NA	NA	0.072±	0.098±	< 10	< 10	76,200	< 1.0	< 0.50	NA.	NA	NA	NA	NA	NA	14	16	3.7	3.7	NA	NA	< 2.0	<5	7.79	11/13/15	Pond D 8A	
< 0.20	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	0.87±	NA	NA	< 0.25	0.086±	< 10	< 10	76,100	< 1.0	< 0.50	NA	NA	N	NA.	NA	NA	15	16	3.8	4.0	NA.	ķ	< 2.0	< 5	7.74	11/13/15	Pond D 8B	
< 0.20	< 0.20	< 2.0	< 1.0	NA	NA	< 5.0	< 2.5	NA	NA	< 0.25	0.084±	< 10	< 10	76,300	< 1.0	< 0.50	NA	NA	NA	NA	NA	NA	15	15	3.7	3.7	NA	NA	< 2.0	UI	7.78	11/13/15	Pond D 8C	STATE OF THE PARTY

Table 1, continued Point Pond D Comingled Water Compared with VPDES Permit Limits for Internal Outfall 503

			VPDES P	VPDES Permit Limits						Pond D C	Pond D Comingled Water				
			Internal (When Routed t	Internal Outfall 503 - When Routed to 001/002 or 004	2	Pond D 6A	Pond D 6B	Pond D 6C	Pond D 7A	Pond D 7A	Pond D 7B	Pond D 7C	Pond D 8A	Pond D 8B	Pond D 8C
Parameters	Units	Monthly Average	Daily Maximum	Minimum	Maximum	11/6/15	11/6/15	11/6/15	11/6/15	11/13/15	11/13/15	11/13/15	11/13/15	11/13/15	11/13/15
Molybdenum, Total	µ9/∟	NL	NL	N/A	N/A	AN	NA	NA.	ĸ	Ą	NA.	NA.	NA	NA	NA
Molybdenum, Dissolved	h9/L	N/A	N/A	N/A	N/A	NA	NA	NA.	NA	NA	NA.	NA	NA	NA	Z.
Nickel, Total	н9/∟	24	â	N/A	N/A	5.5	5.3	4.9	5.5	Ą	4.9	4.8	4.5	4.6	4.4
Nickel, Dissolved	hg/L	N/A	N/A	N/A	N/A	4.6±	5.3	4.5±	4.6±	4.6±	4.5±	4.5±	4.2±	4.7±	4.3±
Selenium, Total	µ9/∟	8.0	15	N/A	N/A	7.4	6.7	6.3	6.7	NA.	5.6	5.4	5.6	5.7	5.4
Selenium, Dissolved	h9/L	N/A	N/A	N/A	N/A	6.3	5.2	6.3	5.4	6.4	5.8	5.9	6.1	5.8	6.3
Silver, Total	µg/L	2.2	4.0	N/A	N/A	< 1.0	< 1.0	< 1.0	< 1.0	NA	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Silver, Dissolved	h9/L	N/A	N/A	N/A	N/A	< 2.0	< 2.0	< 2.0	< 2,0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
Thallium, Total	µg/L	0.94	0.94	N/A	N/A	0.38±	0.39±	0.35±	0.38±	AN	0.40±	0.39±	0.39±	0.40±	0.37±
Thallium, Dissolved	hg/L	N/A	N/A	N/A	N/A	0.48±	0.40±	0.39±	0.39±	0.42±	0.39±	0.37±	0.36±	0.37±	0.39±
Vanadium, Total	µg/L	NL	NL	N/A	N/A	NA	NA	NA	NA	NA A	NA	NA	NA	A	N
Vanadium, Dissolved	нд/Г	N/A	N/A	N/A	N/A	NA	NA	NA.	NA	AN	NA	NA	NA	NA	NA
Zinc, Total	р9/∟	98	180	N/A	N/A	< 2.5	1€.0	< 2.5	< 2.5	NA.	< 2.5	< 2.5	< 2.5	< 2.5	< 2.5
Zinc, Dissolved	µg/L	N/A	N/A	N/A	N/A	< 5.0	6.8	< 5.0	3.9±	< 5.0	< 5.0	< 5.0	< 5.0	5.3	< 5.0
Hardness, Total (as CaCO ₃)	mg/L	NF.	¥	N/A	N/A	150	150	159	158	AN	155	155	154	157	144
Total Nitrogen	mg/L	N/A	N/A	N/A	N/A	NA	NA	NA	NA	NA.	AN	NA	NA	NA	N A
Total Kjeldahl Nitrogen	mg/L	N/A	N/A	N/A	N/A	NA	NA	NA	NA	N.	NA	NA	NA	NA.	NA
Nitrate+Nitrite (NO ₃ +NO ₂), as N	mg/L	N/A	N/A	N/A	N/A	NA	NA	NA	NA	NA	NA.	NA	NA	NA	NA
Ammonia, as N	mg/L	N/A	N/A	N/A	N/A	NA	NA	NA	NA	NA.	NA	NA.	NA	NA	NA
Acute Toxicity - C. dubla (4)	% NOEC	N/A	N/A	100%	N/A	AN	NA	100%	NA	Ä	NA.	NA	NA	NA	NA
Acute Toxicity - P. promelas (4)	% NOEC	N/A	N/A	100%	N/A	NA	NA	100%	NA	N.	NA	NA	NA.	NA	Ā
Chronic Toxicity - C. dubla (5)	TU,	N/A	N/A	N/A	2.85	NA	NA	1.0	NA.	AN	NA	NA	NA	NA	NA
Chronic Toxicity - P. promelas (5)	JU,	N/A	N/A	N/A	2.85	NA	NA	1.0	N.	NA	NA	NA	NA	NA	NA

Footnotes:

- Values preceded by "<" represent results not detected at the Reporting Detection Limit (RDL) and listed as < RDL.

 Values with suffix "±" represent results with an estimated value between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL) for the analyte.
- NA- Not analyzed.
- mg/L milligrams per liter.
- NL = No Limit. µg/L- micrograms per liter.
- Reported as No Observed Effect Concentration (NOEC); 100 percent NOEC is required for Acute Toxicity tests.

 Reported as Chronic Toxicity Units; A maximum of 2.85 Chronic Toxicity Units a lowed for Chronic Toxicity Results.

 VPDES Permit limits for comparison are for the discharge of Outfall 503 to Outfall 001/002.

Table 2
Possum Point Dewatering Water Compared With VPDES Permit Limits for Internal Outfall 503

					,									
WASHINGTON TO SERVICE			VPDES P	VPDES Permit Limits			Pond E Rim Ditch	y			Pond E Well Points	ell Points		
			Internal When Routed t	Internal Outfall 503 - When Routed to 001/002 or 004	2	RMD-1	RMD-2	RMD-3	Well Discharge 1	Well Discharge 2	Well Discharge 3	Well Discharge 3 dup	PWCSA Sample	GAI Duplicate Sample
Parameters	Units	Monthly Average	Daily	Minimum	Maximum	5/5/2015	5/6/2015	5/11/2015	5/11/2015	5/12/2015	5/13/2015	5/13/2015	7/30/2015	7/30/2015
pH (1)	s.u.	N/A	N/A	6.0	9.0	7.85	8.00	8.08		7.88	7.76	7.81	8.15	7.32
Total Suspended Solids (TSS)	mg/L	30	100	N/A	N/A	26	159	44	34	19	20	26	42	27
Oil and Grease (O&G)	mg/L	15	20	N/A	N/A	< 2.0	1.7±	1.1±	1.4±	< 2.0	< 2.0	< 2.0	NA	NA
Aluminum, Total	ug/L	N.	N.	N/A	N/A	NA.	17,800	NA	NA.	59	NA	NA	AN	NA
Aluminum, Dissolved	ng/L	N/A	N/A	N/A	N/A	NA.	260	NA.	NA.	< 80	NA	NA	NA	NA
Antimony, Total	ug/L	1,300	1,300	N/A	N/A	4.3	14	2.7	< 1.0	< 1.0	< 1.0	< 1.0	AN	NA
Antimony, Dissolved	ng/L	N/A	N/A	N/A	A/N	3.9	16	2.5	< 2.0	< 2.0	< 2.0	< 2.0	AN	NA
Arsenic, Total	ug/L	240	440	N/A	N/A	51	370	260	1,100	920	1,200	1,200	390	330
Arsenic, Dissolved	ug/L	N/A	N/A	N/A	N/A	24	240	180	880	810	900	840	< 50	51
Barium, Total	ug/L	N.	N.	N/A	N/A	220	830	290	400	330	420	410	NA	NA
Barium, Dissolved	ug/L	N/A	N/A	N/A	N/A	180	250	240	370	360	380	360	AN	NA
Beryllium, Total	ug/L	¥	N.	N/A	N/A	N.	7.2	NA	NA	< 0.50	NA	NA	< 4.0	0.30±
Beryllium, Dissolved	ug/L	N/A	N/A	N/A	N/A	NA	0.11±	NA	NA	< 1.0	NA	NA	< 50	0.18±
Boron, Total	ug/L	ĸ	N.	N/A	N/A	NA A	1,000	NA	NA	1,300	NA.	NA	NA.	NA
Boron, Dissolved	ug/L	N/A	N/A	N/A	N/A	NA	1,000	NA	NA	1,400	NA	NA	AN	NA
Cadmium, Total	ug/L	1.4	2.6	N/A	N/A	< 0.5	0.55	< 0.50	< 0.50	< 0.50	< 0.50	< 0.50	< 50	0.27±
Cadmium, Dissolved	ug/L	N/A	N/A	N/A	N/A	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 50	< 1.0
Chloride	µg/L	370,000	670,000	N/A	N/A	176,000	191,000	173,000	234,000	251,000	247,000	240,000	NA	NA
Chromium III, Total	ug/L	88	160	N/A	N/A	NA	NA	0.90±	< 1.0	< 1.0	< 1.0	< 1.0	< 50	< 1.0
Chromium III, Dissolved	ng/L	N/A	N/A	N/A	N/A	< 10	NA	0.95±	2.6	2.4	2.5	2.5	< 50	2.0±
Chromium VI, Total	Hg/L	17	32	N/A	N/A	0.096±	0.069±	< 0.25	< 0.25	< 0.25	< 0.25	< 0.25	AN	NA
Chromium VI, Dissolved	h9/L	N/A	N/A	N/A	N/A	0.095±	0.072±	NA	NA	< 0.25	< 0.25	< 0.25	NA	NA
Cobalt, Total	hg/L	NF	NL	N/A	N/A	NA	16	NA	NA	1.8±	NA	AN	AN	NA
Cobalt, Dissolved	ng/L	N/A	N/A	N/A	N/A	NA	< 5.0	NA	NA	2.2±	NA	NA	AN	NA
Copper, Total	1/gu	9.6	1.8	N/A	N/A	3.6	32	4.7	1,0±	< 2.5	0.85±	0.84±	< 50	2.1±
Copper, Dissolved	µg/L	N/A	N/A	N/A	N/A	< 5.0	< 5.0	1.9±	< 5.0	< 5.0	1.6±	< 5.0	< 50	1.9±
Iron, Total	1/6n	NL	N	N/A	N/A	1,700	8,600	980	11,200	10,300	11,800	11,600	AN	NA
Iron, Dissolved	ug/L	N/A	N/A	N/A	N/A	48±	< 60	< 60	5,600	4,900	7,100	6,900	AN	NA
Lead, Total	1/gu	14	26	N/A	N/A	0.95±	38	1.7	< 1.0	< 1.0	< 1.0	< 1.0	< 50	< 1.0
Lead, Dissolved	µg/L	N/A	N/A	N/A	N/A	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 50	< 2.0
Mercury, Total	1/6rl	1.2	2.2	N/A	N/A	< 0.2	0.51	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Mercury, Dissolved	µg/L	N/A	N/A	N/A	N/A	< 0.2	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20	< 0.20
Molybdenum, Total	µg/L	N.	N.	N/A	N/A	N A	50	NA	NA	97	NA	NA	430	400

Concept Englineering Report
Internal Ordfall 503 Wastewater Treatment System
Virginia Electric and Power Company
Coal Combustion Residual Surface Impoundment Closures

Table 2, continued Possum Point Dewatering Water Compared With VPDES Permit Limits for Internal Outfall 503

Chronic Toxicity – C. dubla (3) TU _c N/A N/A N/A 2.65		Acute Toxicity – P. promelas (2) 9/6 NOEC N/A N/A 100% N/A	Acute Toxicity - C. dubia (2) % NOEC N/A N/A 100% N/A	Ammonia, as N mg/L N/A N/A N/A N/A	Nitrate+Nitrite (NO ₃ +NO ₂), as N mg/L N/A N/A N/A N/A	Total Kjeldahi Nitrogen mg/L N/A N/A N/A N/A	Total Nitrogen mg/L N/A N/A N/A N/A	Hardness, Total (as CaCO ₃) mg/L NL NL N/A N/A	Zinc, Dissolved µg/L N/A N/A N/A N/A	Zinc, Total µ9/L 98 180 N/A N/A	Vanadium, Dissolved µg/L N/A N/A N/A N/A	Vanadium, Total µg/L NL NL N/A N/A	Thallium, Dissolved µg/L N/A N/A N/A N/A	Thallium, Total µg/L 0.94 0.94 N/A N/A	Silver, Dissolved µg/L N/A N/A N/A N/A	Silver, Total µg/L 2.2 4.0 N/A N/A	Selenium, Dissolved µg/L N/A N/A N/A N/A	Selenium, Total µg/L 8.0 15 N/A N/A	Nickel, Dissolved µg/L N/A N/A N/A N/A	Nickel, Total µg/L 24 44 N/A N/A	Molybdenum, Dissolved µg/L N/A N/A N/A N/A	Parameters Units Average Maximum Minimum Maximum	Internal Outfall 503 - When Routed to 001/002 or 004	VPDES Permit Limits
	NA	NA	NA	0.058±	< 0.20 (4)	NA	NA	193	8.4	7.3	NA	NA	0.50±	0.61	< 2.0	< 1.0	8.5	9.3	6.7	9.1	NA	5/5/2015	RMD-1	
	NA	NA	NA	0.062±	< 0.40	< 1.0	< 1.0	246	5,4	66	N.	NA.	0.65±	¥	< 2.0	< 1.0	25	łō	6.5	28	46	5/6/2015	RMD-2	Pond E Rim Ditch
	AN	NA	NA	0.043±	< 0.20 (4)	NA	NA	231	8.5	13	NA	NA	0.61±	0.68	< 2.0	< 1.0	10	8,8	11	13	NA	5/11/2015	RMD-3	
	NA	NA.	NA.	0.306	< 0.50 (4)	NA	NA	463	12	26	NA	NA	< 1.0	< 0.50	< 2.0	< 1.0	1.8±	0.84±	8.0	8.1	NA	5/11/2015	Well Discharge 1	
	NA	NA	NA	0.322	< 1.00	< 1.0	< 1.00	401	190	16	NA	NA	< 1.0	< 0.50	< 2.0	< 1.0	1.9±	0.81±	7.6	6.4	80	5/12/2015	Well Discharge 2	
	NA	NA	NA	0.287	< 0.50 (4)	NA	NA	417	11	16	NA	NA	< 1.0	< 0.50	< 2.0	< 1.0	< 5.0	1.3±	7.6	8.2	NA	5/13/2015	Well Discharge 3	Pond E V
	NA	NA	NA	0.282	< 0.50 (4)	NA	NA	415	12	16	NA	NA	< 1.0	< 0.50	< 2.0	< 1.0	1.7±	1.1±	7.5	8.0	NA	5/13/2015	Well Discharge 3 dup	Pond E Well Points
	NA	NA	NA	NA	NA	NA	NA	NA	< 50	< 50	< 50	< 50	N.	NA	N.	N _A	< 50	< 50	< 50	< 50	370	7/30/2015	PWCSA Sample	
	N A	NA	NA	NA	NA	NA	NA	NA	36	6.9	< 2.0	7.2	NA	NA	NA	NA	12	9.2	7.9	7.2	430	7/30/2015	GAI Duplicate Sample	

- pH values measured in laboratory.

 Reported as percent No Observed Effect Concentration (NOEC).

 Reported as Chronic Toxicity Units (TUc)

 Value indicates nitrate (NO₂) only, nitrite was not measured.
- Values preceded by "<" represent results not detected at the Reporting Detection Limit (RDL) and listed as < RDL.

 Values with suffix "±" represent results with an estimated value between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL) for the analyte.
- NA = Not Analyzed
- NL = No Limit
- N/A = Not Applicable
- VPDES Permit limits for comparison are for the discharge of Outfall 503 to Outfall 001/002.



Concept Engineering Report Internal Outfall 503 Wastewater Treatment System Virginia Electric and Power Company Coal Combustion Residual Surface Impoundment Closures

Possum Point Contact Water Compared With VPDES Permit Limits for Internal Outfall 503

			VPDES Permit Limit	rmit Limits		Pond E Contact Water
			Internal Outfall 503 - When	Internal Outfall 503 - When Routed to 001/002 or 004		Pond E
Parameters	Units	Monthly Average	Daily Maximum	M inimum	Maximum	5/5/2015
pH (3)	S.U.	N/A	N/A	6.0	9.6	7.89
Total Suspended Solids (TSS)	mg/L	30	100	N/A	N/A	39
Oil and Grease (O&G)	mg/L	15	20	N/A	N/A	< 2.0
Aluminum, Total	ug/L	NF	N-L	N/A	N/A	1400
Aluminum, Dissolved	ng/L	N/A	N/A	N/A	N/A	110
Antimony, Total	ug/L	1,300	1,300	N/A	N/A	14
Antimony, Dissolved	ng/L	N/A	N/A	N/A	N/A	13
Arsenic, Total	ug/L	240	440	N/A	N/A	90
Arsenic, Dissolved	ug/L	N/A	N/A	N/A	N/A	80
Barium, Total	ug/L	NL	NL	N/A	N/A	210
Barium, Dissolved	ug/L	N/A	N/A	N/A	N/A	160
Beryllium, Total	ug/L	NL	NL	A/N	N/A	< 0.50
Beryllium, Dissolved	ug/L	N/A	N/A	N/A	N/A	< 1.0
Boron, Total	ug/L	NL	NF	N/A	N/A	400
Boron, Dissolved	ug/L	N/A	N/A	N/A	N/A	400
Cadmium, Total	ug/L	1.4	2.6	N/A	N/A	< 0.50
Cadmium, Dissolved	ug/L	N/A	N/A	N/A	N/A	< 1.0
Chloride	µg/L	370,000	670,000	N/A	N/A	72,000
Chromium III, Total	ug/L	88	160	N/A	N/A	< 10
Chromium III, Dissolved	ug/L	N/A	N/A	N/A	N/A	< 10
Chromium VI, Total	µ9/L	17	32	N/A	N/A	0.39
Chromium VI, Dissolved	µg/L	N/A	N/A	N/A	N/A	< 0.25
Cobalt, Total	µ9/L	NL	F	N/A	N/A	< 2.5
Cobalt, Dissolved	ug/L	N/A	N/A	N/A	N/A	< 5.0
Copper, Total	µ9/L	9.6	18	N/A	N/A	< 6.2
Copper, Dissolved	µg/L	N/A	N/A	N/A	N/A	< 5.0
Iron, Total	ug/L	N.	N.	N/A	N/A	660
Iron, Dissolved	ug/L	N/A	N/A	N/A	N/A	< 60
Lead, Total	µg/L	14	26	N/A	N/A	3.0
Lead, Dissolved	нд/Г	N/A	N/A	N/A	N/A	< 2.0
Mercury, Total	µ9/L	1.2	2.2	N/A	N/A	< 0.20
			The state of the s			

Concept Engineering Report
Internal Outfall 503 Wastewater Treatment System
Virginia Electric and Power Company
Coal Combustion Residual Surface Impoundment Closures

Possum Point Contact Water Compared With VPDES Permit Limits for Internal Outfall 503

			VPDES Pe	VPDES Permit Limits		Pond F Contact Water
			Internal Outfall 503 - Whe	Internal Outfall 503 - When Routed to 001/002 or 004		Pond E
Parameters	Units	Monthly Average	Daily Maximum	Minimum	Maximum	5/5/2015
Mercury, Dissolved	hg/L	N/A	N/A	N/A	N/A	< 0.20
Molybdenum, Total	h9/L	N-	NF	N/A	N/A	83
Molybdenum, Dissolved	1/6rt	N/A	N/A	N/A	N/A	67
Nickel, Total	h9/L	24	4	N/A	N/A	14
Nickel, Dissolved	hg/L	N/A	N/A	N/A	N/A	< 5.0
Selenium, Total	1/g ₁ /L	8.0	15	N/A	N/A	17
Selenium, Dissolved	µ9/L	N/A	N/A	N/A	N/A	19
Silver, Total	h9/L	2.2	4.0	N/A	N/A	< 1.0
Silver, Dissolved	H9/L	N/A	N/A	N/A	N/A	< 2.0
Thallium, Total	h9/L	0.94	0.94	N/A	N/A	0.56
Thallium, Dissolved	h9/L	N/A	N/A	N/A	N/A	< 1.0
Vanadium, Total	h9/L	NL	N-	N/A	N/A	N/A
Vanadium, Dissolved	р9/г	N/A	N/A	N/A	N/A	N/A
Zinc, Total	1/وبا	98	180	N/A	A/N	9.1
Zinc, Dissolved	µ9/L	N/A	N/A	N/A	N/A	7.8
Hardness, Total (as CaCO ₃)	mg/L	NL	NL	N/A	N/A	193
Total Nitrogen	mg/L	N/A	N/A	N/A	A/N	< 1.00
Total Kjeldahl Nitrogen	mg/L	N/A	N/A	N/A	N/A	< 1.0
Nitrate+Nitrite (NO ₃ +NO ₂), as N	mg/L	N/A	N/A	N/A	A/N	< 0.40
Ammonia, as N	mg/L	N/A	N/A	N/A	A/N	0.189
Acute Toxicity - C. dubla (2)	% NOEC	N/A	N/A	100%	A/N	N/A
Acute Toxicity - P. promelas (2)	% NOEC	N/A	N/A	100%	N/A	N/A
Chronic Toxicity – C. dubla (3)	₩,	N/A	N/A	N/A	2,85	N/A
Chronic Toxicity - P. promelas (3)	, T	N/A	N/A	N/A	2,85	N/A

- pH values measured in the field.
- Reported as percent No Observed Effect Concentration (NOEC).
- Reported as Chronic Toxicity Units (TUc)
- Values precoded by "<" represent results not detected at the Reporting Detection Limit (RDL) and listed as < RDL.

 Values with suffix "±" represent results with an estimated value between the Mathod Detection Limit (MDL) and the Practical Quantitation Limit (PQL) for the analyte.
- NA = Not Analyzed
- NL = No Limit
- N/A = Not Applicable VPDES Permit limits for comparison are for the discharge of Outfall 503 to Outfall 001/002.





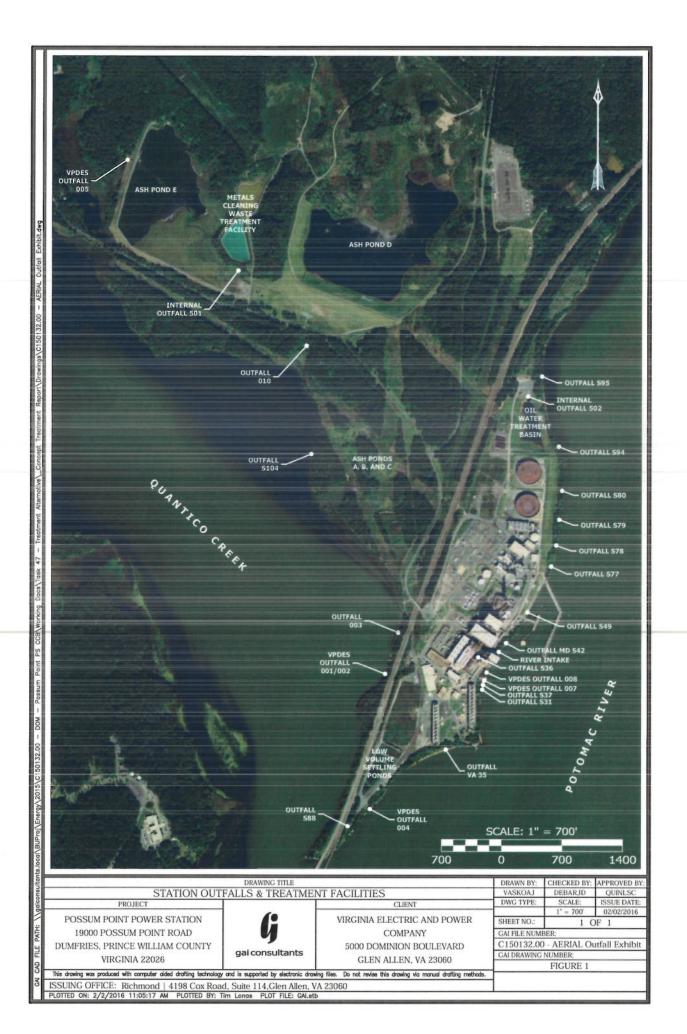
Table 4 Identified Constituents for Which Treatment may be Necessary in Order to Comply with VPDES Permit Limits

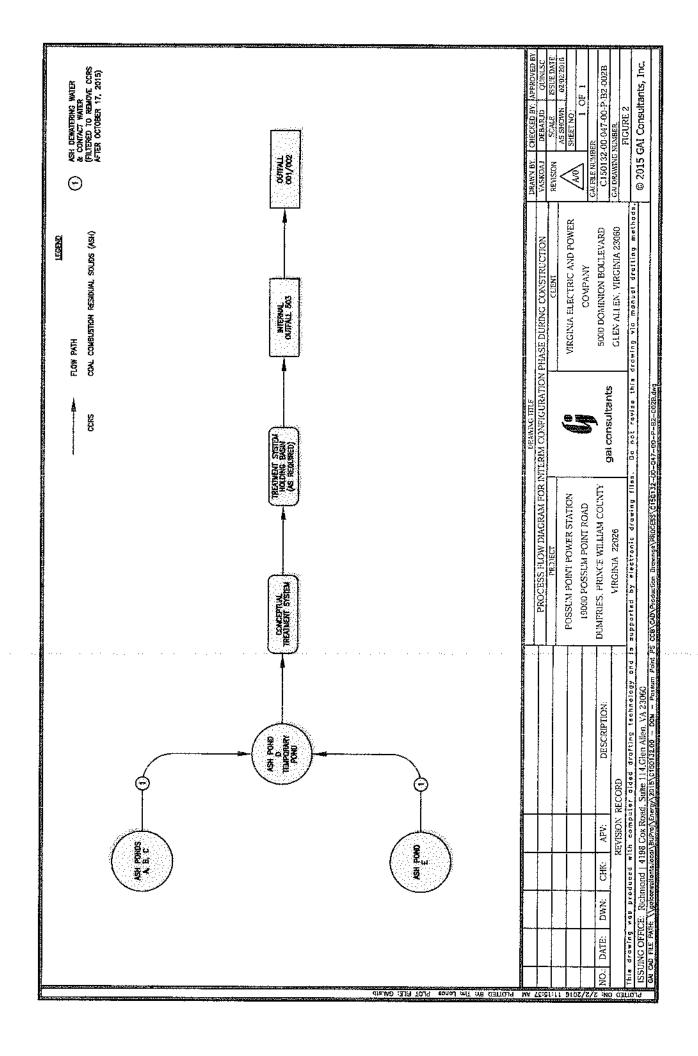
Concept Engineering Report Internal Outfall 503 Wastewater Treatment System Virginia Electric and Power Company Coal Combustion Residual Surface Impoundment Closures

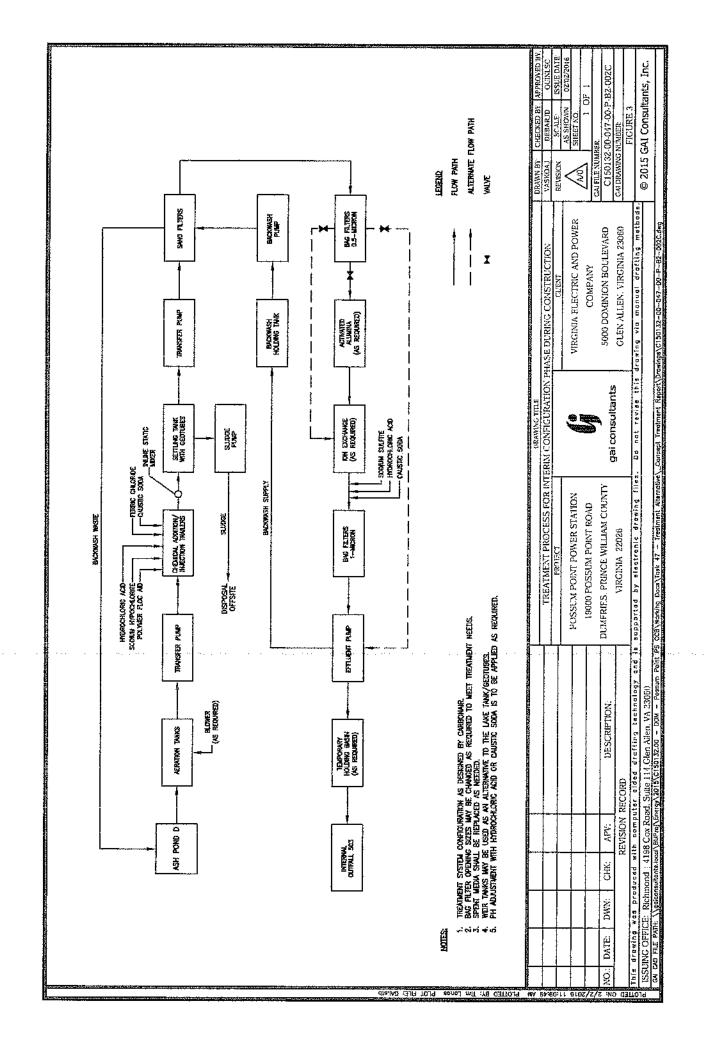
		mit Limits for iternal Outfall 503 o Outfall 001/002	Discharge to In	
DevredO SeulsV	Sampling Location	mumixeM ylied	Monthly Average	Parameter
04 - 8.8	Ash Pond E Dewatering Water	12	0.8	Total Selenium (µg/L)
Zī	Ash Pond E Contact Water			
6SI - ZZ	Ash Pond E Dewatering Water	100	30	Total Suspended Solids (mg/L)
68	Ash Pond E Contact Water			
87	Ash Pond E Dewatering Water	bb	54	Total Nickel (µg/L)
₽.1 – 02.0 >	Ash Pond E Dewatering Water	₽6.0	1 6.0	(J\Q4) muilledT letoT
002'1 - 15	Ash Pond E Dewatering Water	0++	240	Total Arsenic (µg/L)
₽8 - 2.5 >	Ash Pond E Dewatering Water	18	9.6	Total Copper (µg/L)
86 - 0.1 >	Ash Pond E Dewatering Water	97	ьī	(J\gu) bead letoT



FIGURES









Concept Engineering Report Internal Outfall 503 Wastewater Treatment System Virginia Electric and Power Company Coal Combustion Residual Surface Impoundment Closures

APPENDIX ASupporting Literature



AERATION UNIT PROCESS



A variety of aeration technologies exist, ranging from simple gravity-driven cascading flumes to in-line systems that use Venturi-based jet pumps to inject oxygen into the MIW (INAP 2009). Aeration is commonly applied simultaneously with addition of lime and flocculant to increase pH, oxidize metals species, and precipitate metal hydroxides that are then treated through settlement, filtering, or other processes.

2. Applicability

Aeration is applicable to the following situations:

- MIW discharge containing elevated dissolved metals concentrations, with low natural dissolved oxygen
- · wide variety of sites suitable for active treatment technologies

effectiveness and efficiency, and decreasing remediation costs.

- wide range of flow conditions
- · used in conjunction with other metals and neutralization treatment technologies

Aeration is most commonly used for the treatment of MIW containing levels of dissolved metals that exceed regulatory or risk-based water quality standards. MIW often has low pH and low dissolved oxygen content and may contain elevated carbon dioxide (CO₂). In

addition MIW commonly contains elevated levels of iron (Fe²⁺), manganese (Mn²⁺), and other metals that are mobile as dissolved constituents. The introduction of dissolved oxygen through aeration results in oxidation of the metals species into less soluble forms. Where elevated levels of CO₂ are present in MIW, aeration reduces the dissolved CO₂ content, thereby increasing the pH.

Aeration techniques can be engineered to treat a wide range of flow conditions, including sites with very high flow rates and sites with highly variable flow rates. The website at www.gardguide.com/index.php/Aeration_systems for treating CMD (INAP 2009) provides examples of various techniques for application of aeration with and without other treatment.

3. Advantages

The advantages of aeration include the following:

- · simplicity and effectiveness of the fundamental geochemical process
- · application flexibility
- · the use of air as the treatment reagent
- · wide range of site conditions
- · wide range of flow conditions

Oxidation reactions are straightforward and readily occur when oxygen is introduced into low-oxygen MIW containing reduced metals species. Mechanical aeration is an effective and relatively inexpensive method for introducing oxygen. Depending on the contaminants being addressed, pH adjustment may be necessary in addition to aeration to achieve the desired oxidation reaction.

Aeration technologies can be adapted to a wide range of site conditions, making them suitable for remote sites as well as active and/or easily accessible mine sites. Aeration most commonly uses atmospheric air as the treatment reagent, avoiding the permitting, management, handling, and disposal issues that may apply to other chemical reagents.

AERATION UNIT PROCESS

4. Limitations

Aeration introduces oxygen into MIW and is, therefore, applicable to sites with MIW discharge containing elevated, dissolved, reduced metals species concentrations with low natural dissolved oxygen. Sites where MIW has relatively high oxygen content will not benefit appreciably from aeration technologies. Aeration has use as a sole remediation technology in limited situations, but is much more commonly applied in conjunction with other technologies.

5. Performance

No performance data specific to aeration technologies were identified for this technology overview. Aeration is sometimes applied alone but is most commonly applied in conjunction with other treatment technologies to achieve regulatory or risk-based water quality standards. An example system described by EPA (2004) is the In-Line Aeration and Neutralization System, which uses a jet pump or eductor to entrain the air and alkaline chemical by Venturi action and a static mixer. Sodium hydroxide or sodium carbonate is added to the MIW with aeration to create flocculation. The flocculant is directed through a static mixer, to a clarifier, and then to settling ponds.

At the <u>Leviathan Mine Case Study</u> in California, a proprietary technology, Rotating Cylinder Treatment System (RCTS), was used to treat MIW drainage overflows from containment ponds on site during high spring runoff conditions at a rate of 30–300 gallons per minute. The MIW was acidic and contained high concentrations of sulfate and metals, including aluminum, arsenic, cadmium, copper, iron, manganese, nickel, selenium, and zinc. The process involved the use of aeration and lime neutralization to oxidize and precipitate the metals and treat 3 million to 20 million gallons of MIW annually.

The report for the RCTS indicated results for delivery of 9 pounds of oxygen per horsepower-hour and that mechanical surface aeration and submerged turbine aeration deliver 2–3.5 pounds of oxygen per horsepower-hour. The system treated 28 million liters over 85 days at average rates of several hundred liters per minute and a maximum rate of 2800 liters per minute (Tsukamoto n.d.).

As an active treatment method, aeration requires some level of ongoing operations, maintenance, and monitoring and a source of energy (gravity or electrical power) using infrastructure and engineered systems (INAP 2009). However, the level of operations and maintenance and power consumption covers a wide range. Simple gravity-driven flume systems may require infrequent maintenance and no electrical power. In-line systems can be designed to operate using excess systemic water pressure from an existing treatment plant. Otherwise, they can be designed to require little additional electrical power. As such, aeration systems are applicable to a wide range of mine site locations, ranging from remote sites with limited or no power, to active mining operations with comprehensive power infrastructure and labor resources.

6. Costs

No cost information specific to aeration technologies was identified for this technology overview. Aeration costs are primarily associated with capital costs for system design and construction and energy costs and sludge management during operation. Gusek and Figueroa (2009) noted that costs for acid-neutralization technologies, which may be applied in conjunction with aeration, are on the order of several dollars per thousand gallons of treated water. Treatment chemicals can account for one- to two-thirds of the treatment costs. The use of aeration may reduce treatment costs, since the quantity of treatment chemicals is reduced due to the technology using atmospheric air.

7. Regulatory Considerations

Aeration technologies do not add unique additional regulatory considerations than would be otherwise applicable to other MIW technologies. Because aeration typically uses atmospheric air as the reagent, there are no reagent permitting, management, handling, and disposal issues that may apply to other chemical reagents.

8. Stakeholder Considerations

Aeration technologies are not expected to add unique additional stakeholder considerations that would not be otherwise applicable to the other MIW technologies being applied at the site.

9. Lessons Learned

Aeration technologies can be a cost-effective addition to MIW treatment to enhance oxidation and solubility reduction for metals species in MIW. The addition of aeration to other MIW technologies can reduce chemical reagent use and costs. Developments in aeration technology, such as the RCTS, can improve oxygenating efficiency, thus reducing energy costs.

10. Case Studies

Table 10-1. Case study including aeration technology

Leviathan Mine, CA

11. References

EPA (U.S. Environmental Protection Agency). 2004. "Appendix C. Current Information on Mine Waste Treatment Technologies," in Abandoned Mine Lands Team Reference Notebook. www.epa.gov/aml/tech/appenc.pdf.

Gusek, J. J., and L. A. Figueroa, eds. 2009. *Mitigation of Metal Mining Influenced Water*. Littleton, CO: Society for Mining, Metallurgy, and Exploration.

AERATION UNIT PROCESS

INAP (International Network for Acid Prevention). 2009. "Aeration Systems for Treating CMD."

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Reno, NV: Ionic Water Technologies. wvmdtaskforce.com/proceedings/06/Tsukamotopres.pdf

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california water technologies uc

Technical Bulletin

Drinking Water Treatment with Ferric Chloride

Before the 1800's finding sanitary drinking water in the cities of the world was a risky enterprise. The separation of drinking water and human waste was not assured and illness and death due to water borne diseases was very common. In the mid-1800's the connection was made between water purity and public health. Once that connection was made, a concerted effort began to develop water treatment processes that would guaranty the safety of the populace. Over the next century, progress in water treatment methods in the United States, Canada and Northern Europe, came to produce drinking water unequalled in quality and it was reasonable that these largely successful methods should become standardized.

In 1974, the <u>Safe Drinking Water Act</u> was passed by the United States Congress. In 1986 amendments to this act were passed that have radically changed the face of drinking water standards and the processes used to produce potable water in the United States. Water producers soon discovered that the old "tried and true" treatment processes were now inadequate to meet today's requirements. These new requirements made it necessary to re-evaluate the total water plant operation. One of the outcomes of this re-evaluation has been a focus on determining the correct coagulant to meet these new requirements. Ferric chloride has often been central to this discussion.

Ferric chloride is not new to the drinking water treatment industry and has been commercially available in the United States since the 1930's. However, it has only been in the past 15 years that a trend towards increased acceptance of ferric chloride for drinking water treatment has evolved. This is due in large part to significant improvements in product economics, quality and availability. Since 1986 there has been a ground swell in interest in ferric chloride not only for the treatment of turbidity but additionally for the removal of color, natural organic materials and arsenic from raw waters. California Water Technologies has been instrumental in helping Water Treatment Plants understand the extensive capabilities of this coagulant.

Ferric chloride is an interesting compound. It is produced as a solution from the oxidation of ferrous chloride with chlorine and it has the unusual distinction of being one of the purest and most concentrated forms of iron commercially available for water treatment. However, what is truly unusual is its chemistry is that ferric chloride not only functions as a reactant to remove water impurities but it also functions as both a coagulant and a flocculant. Its versatility is enormous.

The reactions of ferric chloride in water include an ability to form precipitates with hydrogen sulfide (H_2S), phosphate (PO_4), arsenic as arsenate (AsO_4) and hydroxide alkalinity (OH).

FLOCCULATION/SEDIMENTATION UNIT PROCESSES

In drinking water treatment, however, understanding ferric chloride's reaction with hydroxide alkalinity is the primary key to understanding its effectiveness as a coagulant/ flocculant.

Ferric chloride reacts in water with hydroxide alkalinity to form various hydrolysis products that incorporate Fe(OH)₃. These compounds possess high cationic charge which allows them to neutralize the electrostatic charges found on colloidal compounds and also to bind to negatively charged particles, including the ferric hydroxide itself. This ability to bind to itself is the mechanism for the formation of floc aggregates and the basis for ferric chloride's flocculation abilities.

The hydrolysis products from ferric chloride, nominally ferric hydroxide, are different from those of sulfate based ferric sulfate and aluminum sulfate (alum). The aggregates or floc particles of ferric hydroxide are physically more discrete and dense and have a higher cationic charge density. In contrast, the floc aggregates of ferric sulfate and aluminum sulfate tend to be less discrete and "fluffy" or cloud like, this apparently due to differences in the types of bonding of the hydrolysis products. These differences translate into characteristics and abilities for ferric chloride that set it far apart from the sulfate based coagulants. In typical plant situations one can expect to use about 30% less ferric chloride than aluminum sulfate (on a dry weight basis) to achieve similar results.

Ferric Chloride forms a more discrete and dense floc that promotes faster sedimentation in general and specifically, better sedimentation in cold water. This dense floc has more available cationic charge that allows higher reactivity with colloidal solids. The high ratio of cationic charge to total mass also makes the ferric chloride hydrolysis products more reactive and adsorptive with emulsified and semi-emulsified organic matter; such as oils, fats, and other natural and synthetic organic matter. This would explain the ability of ferric chloride to remove TOC and other disinfection by product precursors (DBP's).

The high density of the ferric hydroxide floc leads to another important benefit for the treatment plant. The settled sludge volume of the ferric (chloride) hydroxide ranges typically from 1/3 to 2/3 that of sulfate based coagulants. Additionally, the sludge developed through the use of ferric chloride is generally much more dewaterable. So, although the ferric hydroxide molecule itself is heavier than the aluminum hydroxide molecule, this does not translate into more sludge to be disposed of. Instead, because sludge is disposed of on a wet basis rather than on a dry basis, the use of ferric chloride produces fewer wet tons of sludge and yields significant solids handling and disposal savings.

One of the other characteristics of ferric chloride is its ability to form floc over a very wide pH range as is demonstrated in the accompanying charts. The charts also show the very low solubility of ferric hydroxide compared to aluminum hydroxide. The combination of these properties allow ferric chloride to function over a very wide pH range with little fear of carry over into down stream processes due to post precipitation. This ends up being very important for operations looking to flocculate at higher pH's and alkalinity's while controlling

FLOCCULATION/SEDIMENTATION UNIT **PROCESSES**

corrosivity factors in the water. Additionally, the low end of the pH range becomes especially important to enhanced coagulation processes.

Although there is little formal data regarding the use of ferric chloride as a filtration aid there is much operational data that speaks to its ability to greatly enhance turbidity removal with both slow and rapid sand filter filtration. Additionally there are more recent reports that speak to the use of iron coated sand in the removal of manganese.

Potable Water Treatment Applications

- Turbidity removal
- **Enhanced Coagulation**
- NOM, DBP precursor removal
- Color removal
- Arsenic reduction
- Softening Solids Sedimentation Aid
- Filtration Aid

Summary of benefits

- Very effective in the removal of high and low turbidity
- Extremely effective in removal of color, NOM and DBP precursors
- Works over a wide pH range
- Lower dosage requirements than other sulfate based coagulants
- Low cost
- Makes a heavier floc that settles faster and works better in cold water
- Produces higher sludge concentrations = Lower sludge disposal costs
- High iron content sludge is not considered hazardous to the environment and is compatible and beneficial with many land application residuals programs

Handling Ferric Chloride-Read and understand the Ferric Chloride Material Safety Data Sheet

It is extremely important that we handle Ferric Chloride and all chemicals with respect and in a safe manner. Always wear personal protective safety equipment and practice good housekeeping. For more information contact your PVS Technologies representative or resource the material safety data sheet.

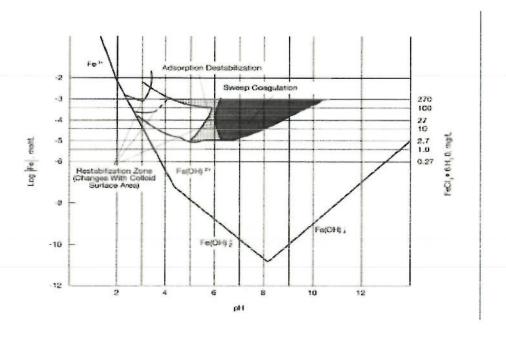
Treatment Methods

Our experience has taught us that each water treatment facility must be approached individually. Differences in raw quality, treatment requirements, facility capabilities and staff expertise require solutions to treatment that are custom designed for the facility. Contact your California Water Technologies representative for knowledgeable assistance in developing solid solutions to your treatment needs.

FLOCCULATION/SEDIMENTATION UNIT PROCESSES

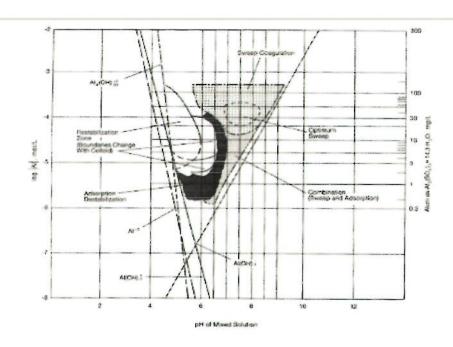
Ferric Chloride Solubility Chart

Source: Johnson P.N. & Amirtharajah A. 1983. Ferric Chloride and Alum as Single and Dual Coagualants Jour. AWWA, 75:5:232.



Aluminum Sulfate Solubility Chart

Source: Amirtharajah A. & Mills, K.M. 1992 Rapid-Mix Design for Mechanisms of Alum Coagulation Jour. AWWA, 74:4:210.



FLOCCULATION, FILTRATION, ACTIVATED ALUMINA, AND ION EXCHANGE UNIT PROCESSES



Water Treatment Technology Feasibility Support Document for Chemical Contaminants; In Support of EPA Six-Year Review of National Primary Drinking Water Regulations

FLOCCULATION, FILTRATION, ACTIVATED ALUMINA, ION EXCHANGE UNIT PROCESSES

A. Beryllium

Recent EPA occurrence analyses estimated beryllium occurrence in public water systems based on a sampling of 16 States (USEPA, 2003b). Based on these analyses, EPA estimates indicate a total of 15 water systems (credible interval of 7 to 24)¹ within these States may have a system mean concentration exceeding the threshold of 0.004 milligrams per liter (mg/L), (i.e., the current MCL for beryllium). Additional occurrence estimates may be found in the above-cited 2003 EPA report.

The current BATs for beryllium removal include activated alumina, ion exchange, lime softening, coagulation/filtration, and reverse osmosis (USEPA, 1990b; USEPA, 1990c; 57 FR 31776 at 31809, July 17, 1992 (USEPA,1992)). Compliance technologies for small systems include these same five BATs, plus point-of-use (POU)-reverse osmosis, POU-ion exchange for small systems (USEPA, 1998b). Removal efficiencies for the above-cited BATs range from 80 to 99 percent. Treatment technologies were discussed by EPA in its technical support documentation on beryllium (USEPA, 1990c). If a treatment plant were to require upgrading, additional ion exchange contact units may be added, POU treatment installed, or a modification to precipitative processes added, as appropriate. The Agency's current assessment is that treatment technology would not pose a limitation, should EPA pursue a revision to this standard.

The current BATs and small system compliance technology for beryllium also apply to other contaminants. These treatment technologies have other beneficial effects (e.g., reduction of hardness or other common impurities) in addition to beryllium removal. If EPA were to consider a higher MCL, the Agency does not know how many of these public water systems currently treating to comply with the current MCL of 0.004 mg/L would be likely to discontinue any treatment that is already in place.

B. Chromium (Total)

1. Treatment technology

Recent EPA occurrence analyses indicate chromium occurrence in public water systems based on a sampling of 16 States (USEPA, 2003b). Based on these analyses, EPA estimates indicate that one water system (credible interval of 0 to 3) within these States may have a system mean concentration exceeding the threshold of 0.1 mg/L, the current MCL for total chromium. In addition, EPA estimates indicate a total of seven systems (credible interval of 3 to13) within these States may exceed the threshold of 0.05 mg/L. Additional occurrence estimates may be found in the above-cited 2003 EPA report.

In publishing the 1989 proposed and 1991 final chromium standard (54 FR 22062 at 22105, May 22, 1989 (USEPA, 1989); 56 FR 3526 at 3552, January 30, 1991 (USEPA, 1991a)) the Agency discussed BATs which include:

• Ion exchange: 80 to 96 percent efficiency;

¹ "Credible intervals" are generated to quantify the uncertainty around each estimated probability in the Bayesian analysis of the occurrence data. For further explanation of credible intervals and the Bayesian analysis, please see Occurrence Estimation Methodology and Occurrence Findings Report for the Six-Year Review of Existing National Primary Drinking Water Regulations (USEPA, 2003b).

FLOCCULATION AND FILTRATION UNIT PROCESSES

- Lime softening for chromium III only: 72 to 99 percent efficiency;
- Coagulation/filtration: 90 to 99 percent efficiency; and
- Reverse osmosis: 82 to 97 percent efficiency.

Due to the ionic properties of the two chromium species in water, chromium III and chromium VI, there is a differentiation in BAT specification which may affect treatment selection. Chromium III and chromium VI exist in water in cationic and anionic valence states, respectively. Lime softening treatment is excluded as a BAT for anionic chromium VI. Regarding the coagulation/filtration option, the choice of coagulant will impact chromium III and chromium VI removal. Ferric sulfate and alum are effective for removal of chromium III, while ferrous sulfate is effective for removal of chromium VI. Regarding ion exchange, a cation exchange resin is required for chromium III, while an anionic resin is required for chromium VI. Therefore, prior to use (or modification) of lime softening, ion exchange, or coagulation/filtration treatment, a public water system should determine concentrations and proportions of species of chromium to select proper media or chemical aid.

The 1996 SDWA Amendments require EPA to determine small system technologies for compliance purposes, (*i.e.*, technology designated as suitable for systems serving 25 to 10,000 persons). In 1998, EPA listed the following compliance technologies for small systems: ion exchange, lime softening (chromium III only), coagulation/filtration, reverse osmosis, POU-reverse osmosis, and POU-ion exchange (USEPA, 1998b).

Due to the high efficiencies of chromium removal by the above technologies, EPA believes that existing BATs would be adequate in meeting a revised standard (if the standard were lowered). Thus, the Agency's current assessment is that treatment technology would not pose a limitation should EPA pursue a revision to the chromium standard.

Due to recent interest by the State of California in setting a drinking water standard for chromium VI (the more toxic form of chromium), that State and others have initiated treatment studies to determine the efficacy of treatment technologies in removal of chromium VI to levels that are lower than the federal standard for total chromium. Newer treatments of interest include an iron-based absorptive filter medium, granular ferric hydroxide (GFH), a technology that has been piloted for arsenic removal at California water systems, and in the United Kingdom. Also, a treatment to reduce low levels of chromium VI to chromium III in drinking water by addition of the chemical stannous chlorine (SnCl₂) is currently under investigation at a water system in Glendale, California. EPA will monitor treatment studies to determine acceptability for use in removal of chromium from drinking water.

2. Additional information

Of additional interest to EPA is the likelihood that disinfection treatment, including chlorination, plays a role in transforming, by oxidation, chromium III to chromium VI in water. The EPA Manual of Treatment Techniques for Meeting the Interim Primary Drinking Water Regulations (USEPA, 1977) and the EPA Occurrence and Exposure Assessment for Chromium in Public Drinking Water Supplies (USEPA, 1990a) discussed effects of chlorination on chromium III in raw water (spiked) and in finished water. EPA found that time of contact, pH and other factors influence oxidation of the species. In addition, a Health Canada criteria summary on chromium in drinking water also indicated uncertainty with respect to whether post-treatment with chlorine, affecting conversion of residual chromium III to chromium VI, may

ACTIVATED ALUMINA UNIT PROCESS

The 1986 final fluoride regulation set "best technologies generally available" (BTGAs) as activated alumina and reverse osmosis. BTGA was defined prior to the SDWA Amendments of 1986, based upon measures of technological efficiency and economic accessibility (*i.e.*, "reasonably affordable by regional and large metropolitan public water systems"). The following factors were considered in determination of BTGA: high removal rate; wide applicability; compatibility with other treatments; and ability to achieve compliance for all water in the public water system (51 FR 11396 at 11398, April 2, 1986 (USEPA, 1986)). These requirements are comparable with current SDWA requirements for BAT determination.

In addition, the 1996 SDWA amendments require EPA to determine small system technologies for compliance purposes, (*i.e.*, technology designated as suitable for systems serving 25 to 10,000 persons). In 1998, EPA listed small system compliance technologies, including both centralized activated alumina and reverse osmosis treatment, as well as POU-reverse osmosis, for removal of fluoride in drinking water (USEPA, 1998b).

The Agency does not believe that the "BTGA" or small systems compliance technologies pose a problem. In addition, should a revision to the designation of "BATs" for this contaminant be considered by EPA, in lieu of the originally specified "BTGA" designation, this would represent a minor revision to the NPDWR (see 40 CFR 141.62 for MCLs for Inorganic Contaminants; and 40 CFR 142.61, which specifies variance technologies for fluoride).

Previously published research and EPA technologies and costs documents (USEPA, 1985b) on these technologies indicate that, due to high efficiencies of removal, the above-cited treatment technologies would not be a limiting factor in setting a lower fluoride MCL. Efficiencies of removal range from 85 to 95 percent, depending upon treatment system design. Thus, the Agency's current assessment is that treatment technology would not pose a limitation should EPA pursue a revision to the fluoride standard.

Both activated alumina and reverse osmosis treatment remove arsenic and fluoride among other impurities. Using activated alumina treatment, optimum removals for both contaminants may occur in a similar range of pH 5.5 to pH 6 (USEPA, 1985b; USEPA, 2000b). However, because arsenic V and silica are preferentially adsorbed by activated alumina media, effectiveness of activated alumina where arsenic and fluoride co-occur may require some investigation. Another activated alumina treatment shortcoming, discussed further below, is the operational difficulty of adding pH adjustment for optimizing removal efficiency (i.e., adjusting pH prior to and after treatment). For some small systems, treatment may be limited to using "natural" pH levels (i.e., unadjusted) thus sacrificing some removal efficiency. However, this application for fluoride removal is not documented.

The Agency discussed technical issues related to activated alumina technology in the above-cited fluoride final rule, including waste generation and disposal. More recent EPA publications have also examined the operation of activated alumina technology and perceived difficulties posed by chemical handling by small systems, (*i.e.*, for pH adjustment and for regeneration of the media), as well as the alternatives to regeneration of activated alumina media. In the case of arsenic treatment, the Agency recommended against the regeneration of activated alumina media at both small centralized treatment and POU applications, due in part to the difficulty of disposing of brine wastes. EPA instead assumed that spent activated alumina media would be disposed of directly at a landfill on a "throw-away" basis and that, based upon arsenic toxicity characteristic leaching procedure (TCLP) testing, this waste would not be deemed

ACTIVATED ALUMINA AND ION EXCHANGE UNIT PROCESSES

Heptachlor is a moderately adsorbed organic contaminant (54 FR 22062 at 22105, May 22, 1989 (USEPA, 1989); 56 FR 3526 at 3552, January 30, 1991 (USEPA, 1991a)). EPA's preliminary assessment is that treatment technology is not anticipated to pose a limitation should the Agency consider revising the current MCL.

3. Heptachlor Epoxide

The BAT for heptachlor epoxide is GAC (56 FR 3526 at 3552, January 30, 1991 (USEPA, 1991a)), and compliance technologies for small systems include GAC, PAC, and POU-GAC (USEPA, 1998b). Since the results of the analytical methods feasibility review indicate that it may be possible to recalculate the PQL for heptachlor epoxide, EPA has reviewed treatment feasibility to determine if it is likely to become an issue if EPA were to revise the MCL. Treatment is not known to be a limiting concern for the current MCL.

Heptachlor epoxide is a strongly adsorbed organic contaminant, generally attributed to a low carbon usage rate (54 FR 22062 at 22105, May 22, 1989 (USEPA, 1989); 56 FR 3526 at 3552, January 30, 1991 (USEPA, 1991a)). Based on this information, EPA's current assessment is that treatment technology is not anticipated to pose a limitation should the Agency consider revising the current MCL.

4. <u>Hexachlorobenzene</u>

The BAT for hexachlorobenzene is GAC (57 FR 31776 at 31809, July 17, 1992 (USEPA, 1992)), and compliance technologies for small systems include GAC, PAC, and POU-GAC (USEPA, 1998b). Since the results of the analytical methods feasibility review indicate that it may be possible to recalculate the PQL for hexachlorobenzene, EPA has reviewed treatment feasibility to determine if it is likely to become an issue if EPA were to revise the MCL. Treatment is not known to be a limiting concern for the current MCL.

Since hexachlorobenzene is a moderately adsorbed contaminant, EPA's current assessment is that treatment technology is not anticipated to pose a limitation should the Agency consider revising the current MCL.

5. Thallium

BATs for thallium include activated alumina and ion exchange (57 FR 31776 at 31809, July 17, 1992 (USEPA, 1992)). EPA also listed small systems compliance technologies for this contaminant as activated alumina, ion exchange, POU-ion exchange (USEPA, 1998b). Since the results of the analytical methods feasibility review indicate that it may be possible to recalculate the PQL for thallium, EPA has reviewed treatment feasibility to determine if it is likely to become an issue if EPA were to revise the MCL. Treatment is not known to be a limiting concern for the current MCL.

According to technical information provided previously by EPA for thallium, competing ions in water may affect treatment run lengths (USEPA, 1998b). Assuming reasonable engineering practices, high removals of this contaminant are feasible. Removals may be expected to be greater than 90 percent using cation exchange systems, and greater than 95 percent using activated alumina treatment (55 FR 30370 at 30416, July 25, 1990 (USEPA, 1990d)). Based on this information, EPA's current assessment is that treatment technology is not anticipated to pose a limitation should the Agency consider revising the current MCL.

Other McGraw-Hill Reference Books of Interest

AMERICAN WATER WORKS ASSOCIATION • Water Treatment Plant Design AVALLONE AND BAUMEISTER • Marks' Standard Handbook for Mechanical Engineers

BRATER . Handbook of Hydraulics

CONSIDINE • Process Instruments and Controls Handbook

CORBITY • Standard Handbook of Environmental Engineering DEAN • Lange's Handbook of Chemistry FREEMAN · Standard Handbook of Hazardous Waste Treatment and Disposal

Community Water Supplies

A Handbook of

and Treatment

Water Quality

Frederick W. Pontius, Technical Editor

American Water Works Association

GAYLORD AND GAYLORD · Structural Engineering Handbook

GRIGG · Water Resources Planning

HARRIS · Handbook of Noise Control

HICKS • Standard Handbook of Engineering Calculations

KARASSIK ET AL. · Pump Handbook

MERRITT · Standard Handbook for Civil Engineers

MILLER • Flow Measurement Engineering Handbook

NALCO · The Nalco Water Handbook

PERRY AND GREEN • Perry's Chemical Engineers' Handbook

ROSA · Water Treatment Specification Manual

ROSALER AND RICE • Standard Handbook of Plant Engineering SCHWEITZER • Handbook of Separation Techniques for Chemical

Engineers SHINSKEY • Process Control Systems

SHUGAR AND DEAN • The Chemist's Ready Reference Handbook

ACTIVATED ALUMINA ADSORPTION UNIT **PROCESS**

Fourth Edition

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ACTIVATED ALUMINA ADSORPTION UNIT PROCESS

General Effectiveness of Water Treatment Processes for Contaminant Removal 1-45

				Ion ex	change	Mem	brane pro	cesses		Adsorption		
an str pir (Ch	Aeration and strip- ping (Chap. 5)	and tation, L strip- filtra- si ping tion en (Chap. (Chaps. (C	Lime soft- ening (Chap. 10)	Anion (Chap. 9)	Cation (Chap. 9)	Reverse osmosis (Chap. 11)	Ultra filtra- tion (Chap. 11)	Electro- dialysis (Chap.	Chemical oxidation, disinfection (Chaps. 12,14)	GAC (Chap. 13)	PAC (Chap. 13)	Activated alumina (Chap. 9)
A. Primary contaminants									W	-	To the second	
 Microbial and turbidity 												
Total coliforms	P	G-E	G-E	P	P	E	E		E	F	P	P-F
Giardia lamblia	P	G-E	G-E	P	P	E	\mathbf{E}		E	F	P	P-F
Viruses	P	G-E	G-E	P	P	E	E		E	F	P	P-F
Legionella	P	G-E	G-E	P	P	E	E		E	P	p	P-F
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2. Inorganics									-	5	8	
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Arsenic (+5)	P	G-E	G-E	G-E	P	G-E	-	G-E	P	F-G	P-F	E
Asbestos	P	G-E		_	_	-			P	_		
Barium	P	P-F	G-E	P	E	E		G-E	P	P	P	P
Cadmium	P	G-E	E	P	E	E	_	E	P	P-F	P	P
Chromium (+ 3)	P	G-E	G-E	P	E	E	-	E	F	F-G	F	P
Chromium (+ 6)	P	P	P	E	P	G-E	-	G-E	P	F-G	F	P
Cyanide	P	-	_	_		G	-	G	E	_	_	_
Fluoride	P	F-G	P-F	P-F	P	E	-	E	P	G-E	P	E
Lead	P	E	E	P	F-G	E		E	P	F-G	P-F	P
Mercury (inorganic)	P	F-G	F-G	P	F-G	F-G	-	F-G	P	F-G	F	P
Nickel	P	F-G	E	P	E	E	10010	E	P	F-G	P-F	P
Nitrate	P	P	P	G-E	P	G		Ğ	P	P	P	P
Nitrite	F	P	P	G-E	P	G	_	G	G-E	P	P	P
Radium (226 and 228)	P	P-F	G-E	P	E	E	_	G-E	P	P-F	P	P-F
Selenium (+ 6)	P	P	P	G-E	P	E		E	P	P	P	G-E
Selenium (+4)	P	F-G	F	G-E	P	E	-	E	P	P	P	(2. P

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ROHM AND HAAS COMPANY FLUID PROCESS CHEMICALS DEPARTMENT PHILADELPHIA, PENNSYLVANIA 18105 No. 162 Fall, 1979 CINDOET-DI-ITES

ION EXCHANGE IN HEAVY METALS REMOVAL AND RECOVERY

William H. Waitz, Jr.

WEAKLY ACIDIC CATION EXCHANGE UNIT PROCESS

Editor's Note

Amber-hi-Lites has now completed 30 years of continuous publication. This milestone is a tribute to the efforts of Dr. Robert Kunin, who wrote the first issue and nearly every one since, and continues to be the principal contributor. We want publicly to acknowledge our debt to him for his guidance and hard work. Dr. Kunin joined the Research Division of Rohm and Haas Company in 1946 and was employed there until 1970 when he became a member of the marketing staff. in this new capacity he served as technical consultant to the company's ion exchange sales and marketing personnel throughout the world. He retired from Rohm and Haas in 1976 and established a private consulting practice. Throughout his association with Amber-hi-Lites, his fertile imagination, his encyclopedic knowledge of the chemical industry and his prolific pen have enabled this publication to grow and develop. We are grateful to him, and look forward to his future contributions.

The first issue of Amber-hi-Lites was dated April, 1949, and differed considerably from our current issue. There were several short items on the front page, covering various news items of interest to the ion exchange "industry." The second and third pages contained three short articles on *Protein Purification, Silica Sorption* and *Bacteria Binding* as well as several abstracts of articles on ion exchange taken from the current literature. The back page was devoted to an advertisement for two new ion exchange resins, Amberlite IRC-50 and Amberlite IRA-400.

There was a short note on the bottom of the front page which read:

"Every publication must have a motive, a plan, a reason for existence. And Amber-hi-Lites is no exception. It will report all the news of ion exchange that it can

hold, so that you who now employ adsorption techniques, and you who search for efficient process short-cuts, and you who have only an academic interest in ion exchange phenomena may run and read and file to read again."

This statement of objective is as valid today as it was then. The technology of ion exchange has increased in scope and complexity, and the length and depth of Amber-hi-Lites have both increased accordingly. Short items have given way in this publication to longer, more involved treatises on a single phase or use of ion exchange. Amber-hi-Lites has provided a forum for presentation of new ideas, new products and new concepts, and it has occasionally been the starting point for spirited discussions on various aspects of the art and science of ion exchange between people whose views might differ from those expressed in these pages.

This issue of Amber-hi-Lites features an article on adsorption of heavy metals, written by William H. Waitz, Jr. Mr. Waitz is Market Planning Manager for Industrial Chemicals-North America, located in Rohm and Haas Company's Home Office in Philadelphia. He has had extensive marketing experience, most recently in the field of waste control and sugar processing applications of ion exchange resins.

Gerald D. Button Editor

INTRODUCTION

Interest in the removal and/or recovery of heavy metals from industrial waste streams continues to increase as discharge limitations become more restrictive. Pre-treatment of wastes prior to discharge to municipal sewage treatment plants is now a reality. In the past, it has frequently been possible to comply with the limitations through the use of precipitation systems. However, as permissible discharge limits are

WEAKLY ACIDIC CATION EXCHANGE UNIT PROCESS

lowered, precipitation will not meet these lower limits. In addition, when working at the usual low concentrations encountered in industrial waste streams, excessive amounts of chemicals are required to effect precipitation and large lagoons are necessary to settle out the resulting sludge. As inflation increases the value of metals, recovery begins to look more attractive. Consequently, there is increasing interest in ion exchange as a part of industrial waste treatment systems.

Ion exchange has been used widely for a number of years in the recovery of gold from plating wastes and for the rejuvenation of chrome plating baths by the removal of Fe⁺³ and Cr⁺³. The chrome plating installations also use anion exchange resins to recover CrO₄-2 ions from the rinse water for return to the plating baths.¹ Recovery of Na₂CrO₄ from cooling tower blowdown for return to the system is another application being used in several large scale operations.²

In designing an ion exchange system to remove objectionable ions from waste streams, one must, of course, consider the selectivity of the resins for various ions. Fortunately, the natural selectivity of ion exchange resins favors the larger ions with higher valence. At low concentrations, therefore, both weakly and strongly acidic cation exchange resins will exchange ions of alkali metals and alkaline earths for heavy metal ions. The weakly and strongly basic anion exchange resins have an affinity for the large heavy metal anion complexes such as Fe(CN)₆ 4.3

The major exceptions to this preference for larger ions with higher valence are that weakly acidic cation exchange resins prefer to be in the acid (hydrogen ion) form and weakly basic anion exchange resins prefer to be in the free base form rather than a salt form. As a result, weakly acidic cation exchangers prefer hydrogen ions to all other cations and weakly basic anion exchange resins will shift preferentially to the free base form in the presence of hydroxide ions.

The resin choice in designing an ion exchange system for heavy metals removal or recovery is, of course, dependent upon the goal of the installation. If the removal of a single species is required, then a resin that is primarily selective for that ion, such as a "chelating resin," is called for. If, on the other hand, a variety of heavy metals must be removed, this can often be accomplished with a weakly acidic resin in the sodium form which will replace all the heavy metal ions with sodium ions. Where deionizing and recycling of waste water is of interest, a strongly acidic cation exchange resin in the hydrogen form must be used since it will release hydrogen ions to replace all other cations in the stream.

If one or more of the heavy metals to be removed is present as an anionic complex, an anion exchange resin, usually in the salt form, is selected. This resin will adsorb only those metals which are present as anions; all others present as cations will pass through the resin bed totally unadsorbed.

CHELATING RESIN

Amberlite IRC-718 is a macroreticular chelating resin specifically designed for the removal of certain heavy

¹Kunin, R., Amber-hi-lites, #104, March 1968 ²Kunin, R., Amber-hi-lites #151, May 1976 ³Avery, N.L. and Waitz, W.H., Amber-hi-lites #155, summer 1977 metals. For most applications, it must be operated in the sodium form and, therefore, cannot be used in total deionization. However, because of its high affinity for Cu⁺² and Fe⁺³, it can be operated in the hydrogen form when being used to remove these ions.

The selectivity, relative to calcium, of Amberlite IRC-718 for various cations at pH 4, determined in column experiments under laboratory conditions, is shown in Table I (as below). These values will, of course, be affected by both the concentration of metals and the pH of the stream being treated, as well as by changes in electrolyte and background metal concentrations. Note the resin's much greater selectivity for heavy metals than for calcium.

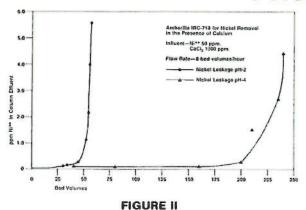
TABL	
Selectivities of Amberlite	
ph = 4	4.0
	K ^M /ca
Metal Ion	
Hg ⁺²	2800
Cu ⁺²	2300
Pb ⁺²	1200
Ni ⁺²	57
Zn ⁺²	17
Cd ¹²	15
Co ⁺²	6.7
Fe ⁺²	4.0
Mn ⁺²	1.2
Mn ⁺² Ca ⁺²	1.0

The selectivity of Amberlite IRC-718 was also investigated in an ammoniacal stream (pH=9) containing 200 g/l (NH₄)₂SO₄. The results are given in Table II.

Selectivities of Ami for Metal (pH = 9.0, ar	lons
Metal Ion	KM/Ca
Co ⁺²	K ^M /Ca 83
Co ⁺² Ni ⁺² Cd ⁺² Cu ⁺² Zn ⁺² Ca ⁺²	30
Cd ⁺²	14
Cu ⁺²	10
Zn+2	3
Ca ⁺²	1

Amberlite IRC-718 can be regenerated efficiently with a 4 to 10% solution of a strong acid. Capacities for various heavy metals under a variety of conditions are given in Table III.

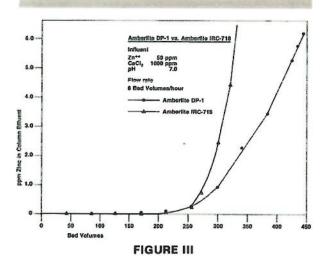
WEAKLY ACIDIC CATION EXCHANGE UNIT PROCESS



CHELATING RESIN VERSUS WEAKLY ACIDIC CATION EXCHANGE RESIN

Although Amberlite IRC-718 is often required to achieve efficient heavy metals removal, Amberlite DP-1, a weakly acidic cation exchange resin in the sodium form, sometimes exhibits equal or superior capacity and regeneration efficiency when treating waste streams containing heavy metals. In addition, this resin is less costly than Amberlite IRC-718, Table V and Figure III compare Amberlite DP-1 with Amberlite IRC-

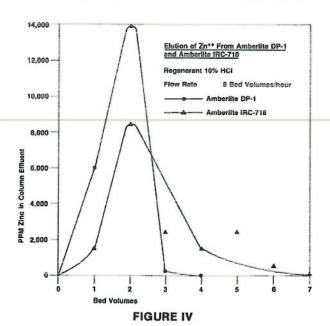
	IRC-718 (Na ⁺) vs Influent: Zn ⁺² 5 CaCi ₂ 1000 p pH = 7.0 :: 8 Bed Volumes/	0 ppm ppm
	Effluent A	nalysis ppm Zn'2
Bed Volumes	Amberlite DP-1	Amberlite IRC-718
86	0.01	0.01
128	0.02	0.01
171	0.07	0.01
214	0.10	0.05
257	0.27	0.22
274	The state of the state of	0.72
300	0.91	2.44
342	2.28	8.20



718, both in the sodium form, for the removal of zinc from a solution containing 50 ppm of Zn⁺² and 1,000 ppm of CaCl₂ at a pH of 7.0. The flow rate was 8 bed volumes per hour or 1 gpm/ft³ and removal was essentially the same for both resins except that Amberlite IRC-718 showed a sharper break in the leakage curve after 250 bed volumes.

Table VI and Figure IV illustrate the elution curves for zinc from Amberlite IRC-718 and Amberlite DP-1 with a 10% HCI regenerant at a flow rate of 8 bed volumes per hour or 1 gpm/ft³. It can be seen that Amberlite DP-1 gives a sharper elution curve and is, therefore, the better choice under these particular circumstances.

	Table VI Zinc Regenerat f 10% HCL Follow : 8 Bed Volumes/I	red by D.I. H ₂ O
	Effluent An	alysis ppm Zn ⁺²
Bed Volumes	Amberlite DP-1	Amberlite IRC-718
1	6,000	1,560
2	13,950	8,450
3	252	2,400
4	9	1,505
5	1	2,405
7	1	46



In Table VII and Figure V, Amberlite IRC-718 and Amberlite DP-1 are compared for Pb⁺² removal. In this waste stream the concentration of Pb⁺² was 50 ppm in the presence of 1,000 ppm of CaCl₂ and at a pH of 4.0. The flow rate through the resin was 8 bed volumes per hour or 1 gpm/ft³ The data show the significant advantage of Amberlite DP-1 over Amberlite IRC-718 in this application.

Concept Engineering Report Internal Outfall 503 Wastewater Treatment System Virginia Electric and Power Company Coal Combustion Residual Surface Impoundment Closures

APPENDIX B Conceptual Treatment System Design Basis and Equipment General Arrangement





Water Treatment Equipment & Systems | Rentals · Sales · Services

M DWEST 800.526.4999 SOUTHEAST 800/2417833 500 THWEST 800 893 5937 MID-ATLANTIC 800/204/0324 NORTHEAST 877.426.1912



Glover Construction Dumfries, VA

Design Basis:

Customer:

Site:

Date:

Flow rate:

1/19/16

2,000 1,750

gpm (maximum)

Volume to be treated:

200,000,000

gpm (average) gallons

Water temperature:

55

°F (assumed)

Contaminant	Influent Conc. ^(a)	Effluent Criteria ^(b) (Monthly Average)	Effluent Criteria ^(b) (Daily Maximum)	Unit
pH	7.85	6-9	6-9	s.u.
TSS	150	30	100	mg/L
O&G	6.9	15	20	mg/L
Aluminum (total)	17,800	NL	NL	ug/L
Aluminum (dissolved)	280	N/A	N/A	ug/L
Antimony (total)	14	1,300	1,300	ug/L
Antimony (dissolved)	16	1,300	1,300	ug/L
Arsenic (total)	1,200	240	440	ug/L
Arsenic (dissolved)	900	N/A	N/A	ug/L
Barium (total)	830	NL	NL	ug/L
Barium (dissolved)	380	N/A	N/A	ug/L
Beryllium (total)	7.2	NL	NL	ug/L
Beryllium (dissolved)	0.18	N/A	N/A	ug/L
Boron (total)	1,300	NL	NL	ug/L
Boron (dissolved)	1,400	N/A	N/A	ug/L
Cadmium (total)	0.27	1.4	2.6	ug/L
Cadmium (dissolved)	< 1	N/A	N/A	ug/L
Chloride	251,000	370,000	670,00	ug/L
Chromium III (total)	16	88	160	ug/L
Chromium III (dissolved)	2.6	N/A	N/A	ug/L
Chromium VI (total)	0.14	17	32	ug/L
Chromium VI (dissolved)	0.12	N/A	N/A	ug/L
Cobalt (total)	16	NL	NL	ug/L
Cobalt (dissolved)	2.2	NL	NL	ug/L
Copper (total)	84	9.6	18	ug/L
Copper (dissolved)	1.9	N/A	N/A	ug/L
Iron (total)	11,800	NL	NL	ug/L
Iron (dissolved)	7,100	N/A	N/A	ug/L
Lead (total)	38	14	26	ug/L
Lead (dissolved)	< 2	N/A	N/A	ug/L
Mercury (total)	< 0.2	1.2	2.2	ug/L
Mercury (dissolved)	0.35	N/A	N/A	ug/L
Molybdenum (total)	430	NL	NL	ug/L

Molybdenum (dissolved)	430	N/A	N/A	ug/L
Nickel (total)	28	24	44	ug/L
Nickel (dissolved)	8	N/A	N/A	ug/L
Selenium (total)	40	8	15	ug/L
Selenium (dissolved)	25	N/A	N/A	ug/L
Silver (total)	< 1	2.2	4.0	ug/L
Silver (dissolved)	< 2	N/A	N/A	ug/L
Thallium (total)	1.4	0.94	0.94	ug/L
Thallium (dissolved)	0.65	N/A	N/A	ug/L
Vanadium (total)	7.2	NL	NL.	ug/L
Vanadium (dissolved)	< 2	N/A	N/A	ug/L
Zinc (total)	66	98	180	ug/L
Zinc (dissolved)	190	N/A	N/A	ug/L

- a) Based on the maximum detected concentrations from Pond D and Pond E.
- Based on the VDEQ limits for discharge via Outfall 503 to Outfall 001.
 Bold values indicate the exceedance of the discharge limits.
 NL = No limit

N/A = Not applicable

Recommendations:

<u>Aeration Tanks</u> (to oxidize arsenic) Carbonair does not believe this step is necessary 4-21,000 gallon tank

Injection Trailers

Includes automatic injection capabilities for pH Adjustment, Flocculation and FeCi₃

Ferric Chloride (FeCl₃) Injection (to produce iron flocs for adsorption of arsenic)

10-gph injection pump

- We recommend that FeCl₃ be initially injected at a dosage of 10 ppm. The required injection rates of the 20% by wt solution are calculated to be 4.2 and 3.7 gph at 2,000 and 1,750 gpm, respectively
- The initial 40% FeCl₃ solution consumption rates are calculate to be ~ 50 and 44 gpd at 2,000 and 1,750 gpm, respectively.

PolymerInjection (to enlarge iron flocs for adsorption of arsenic)

10-gph injection pump

Exact polymer and dosing to be determined by bench testing

Flocculation/Settling Tanks/Basins (to allow from to form flocs to adsorb arsenic)

Sand Filters (to remove suspended iron flocs)

Four Model 4-54 sand filters in parallel, each Model 4-54 comprising four 54-inch diameter filters in parallel

- Each filter in Model 4-54 will be backwashed with treated water from the other three filters for at a backwashing flow rate of - 250 gpm for 10 minutes. During the backwashing period, the total flow rate through the four Model 4-54's should be reduced to - 1,500 gpm.
- We recommend that the backwash water be delivered back to the ponds.

Post-Filters (to remove fine particulates)

Four Krystil Klear Multi-Round Model 3636 bag filter housings (1-micron high efficiency) in parallel

 The post-filters are recommended for the removal of fine particulates, which may be associated with any heavy metals.

Activated Alumina Adsorbers (to remove dissolved selenium)

Four PC78's in parallel, each vessel filled with 500 ft³ (20,000 lbs) of granular activated alumina (AA)

Assuming all the dissolved arsenic to be removed by pre-treatment upstream, all the four
vessels are predicted to last ~ 598.4 million gallons of water or 208 days of continuous operation
at 2,000 gpm.

NOTICE

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ARSENIC REMOVAL SYSTEM

Carbonair

1480 County Road C West, Roseville, MN 55113 Phone: 800-526-4999 Fax: 651-202-2985 www.carbonair.com

Project name:	Dumfries, VA	,
Flow rate:	2000	gpm
Total selenium (as arsenic) concentration:	25	ppb
Arsenite (AsIII) concentration:	Unknown	ppb
Arsenate (AsV) concentration:	Unknown	ppb

Adsorber model:	PC78			
Number of adsorbers:	4			
Adsorber arrangement:	In parallel			
Type of adsorbing media:	Activated Alumina			
Media bulk density:	40	lbs/cu.ft.		
Volume of media in each adsorber:	500	cu.ft.		
Total volume of media:	2000	cu.ft.		
Total mass of media:	80000	lbs		
Preoxidation:	Yes			

Estimated treatable volume of water (with preoxidation):	598,400,000	gal

