



Paul Draovitch
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May 22, 2018

Mr. Jeffrey Poupart
North Carolina Division of Water Resources
1617 Mail Service Center
Raleigh, NC 27699-1617

Re: Application for Special Order by Consent
Duke Energy Carolinas, LLC
Belews Creek Steam Station
NC0024406
Stokes County

Dear Mr. Poupart,

Duke Energy Carolinas, LLC submits the enclosed application for a Special Order by Consent related to the relocation and elimination of operational flows at the Belews Creek Steam Station. A completed application (in triplicate) and check in the amount of \$400.00 for the nonrefundable application fee are enclosed.

Should you have any questions regarding this letter or require additional information, please contact Shannon Langley at (919) 5462439 or at shannon.langley@duke-energy.com.

"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 fines and imprisonment for knowing violations."

Sincerely,

A handwritten signature in blue ink, appearing to read 'Paul Draovitch', written over a large, stylized blue oval.

Paul Draovitch
SVP - Environmental, Health & Safety

Enclosures

Duke Energy cc: Richard Baker, Jim Wells, Matt Hanchey, Shannon Langley

**STATE OF NORTH CAROLINA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER RESOURCES**

APPLICATION FOR A SPECIAL ORDER BY CONSENT (SOC)

I. PERMIT RELATED INFORMATION:

1. Applicant (corporation, individual, or other): Duke Energy Carolinas, LLC
2. Print or Type Owner's or Signing Official's Name and Title:
Paul Draovitch, Senior Vice President, Environment Health & Safety
3. Facility Name (as shown on Permit): Belews Creek Steam Station
4. Owner Phone: (980) 373-4370 (or) _____
5. Owner Email: paul.draovitch@duke-energy.com
4. Application Date: May 21, 2018
5. NPDES Permit No. (if applicable): NC0024406
6. Name of the specific wastewater treatment facility (if different from I.3. above):
Belews Creek Steam Station

II. PRE-APPLICATION MEETING:

Prior to submitting this completed application form, applicants must meet with the appropriate regional office staff to discuss whether or not an SOC is appropriate for this situation. Please note the date this meeting occurred and who represented the permittee:

Representative: Various Duke Energy staff including Jim Wells, VP of EHS Programs and Environmental Sciences Date: May 2, 2018

III. ADDITIONAL FLOW OR FLOW REALLOCATION:

In accordance with NCGS 143-215.67(b), only facilities owned by a unit of government may request additional flow.

Additional flow may be allowed under an SOC only in specific circumstances. These circumstances may include eliminating discharges that are not compliant with an NPDES or Non-discharge permit. These circumstances do not include failure to perform proper maintenance of treatment systems, collection systems or disposal systems. When requesting additional flow, the facility must include its justification and supporting documentation.

If the requested additional flow is **non-domestic**, the facility must be able to demonstrate the ability to effectively treat the waste and dispose of residuals. The applicant must provide a detailed analysis of the constituents in the proposed non-domestic wastewater.

The total domestic additional flow requested: N/A gallons per day.

The total non-domestic additional flow requested: N/A gallons per day.

The total additional flow (*sum of the above*): N/A gallons per day.

Please attach a detailed description or project listing of the proposed allocation for additional flow, with an explanation of how flow quantities were estimated. Further, any additional flow requested must be justified by a complete analysis, by the permittee, that additional flow will not adversely impact wastewater collection/treatment facilities or surface waters.

IV. NECESSITY NARRATIVE:

Please attach a narrative providing a detailed explanation of the circumstances regarding the necessity of the proposed SOC. Include the following issues:

- Existing and/or unavoidable future violations(s) of permit conditions or limits(s),
- The existing treatment process and any process modifications that have been made to date to ensure optimum performance of existing facilities,
- Collection system rehabilitation work completed or scheduled (including dates),
- Coordination with industrial users regarding their discharges or pretreatment facilities. Identify any non-compliant significant industrial users and measure(s) proposed or already taken to bring the pretreatment facilities back into compliance. If any industrial facilities are currently under consent agreements, please attach these agreements,
- Date and outcome of last Industrial Waste Survey,
- Whether or not the facility is acting as a regional facility receiving wastewater from other municipalities having independent pretreatment programs.

V. CERTIFICATION:

The applicant must submit a report prepared by an independent professional with expertise in wastewater treatment. This report must address the following:

- An evaluation of existing treatment units, operational procedures and recommendations as to how the efficiencies of these facilities can be maximized. The person in charge of such evaluation must sign this document.
- A certification that these facilities could not be operated in a manner that would achieve compliance with final permit limits. The person making such determination must sign this certification.
- The effluent limits that the facility could be expected to meet if operated at their maximum efficiency during the term of the requested SOC (be sure to consider interim construction phases).
- Any other actions taken to correct problems prior to requesting the SOC.

VI. PREDICTED COMPLIANCE SCHEDULE:

The applicant must submit a detailed listing of activities along with time frames that are necessary to bring the facility into compliance. This schedule should include milestone dates for beginning construction, ending construction, and achieving final compliance at a minimum. In determining the milestone dates, the following should be considered:

- Time for submitting plans, specifications and appropriate engineering reports to DWR for review and approval.
- Occurrence of major construction activities that are likely to affect facility performance (units out of service, diversion of flows, etc.) to include a plan of action to minimize impacts to surface waters.
- Infiltration/Inflow work, if necessary.
- Industrial users achieving compliance with their pretreatment permits if applicable.
- Toxicity Reduction Evaluations (TRE), if necessary.

VII. FUNDING SOURCES IDENTIFICATION:

The applicant must list the sources of funds utilized to complete the work needed to bring the facility into compliance. Possible funding sources include but are not limited to loan commitments, bonds, letters of credit, block grants and cash reserves. The applicant must show that the funds are available, or can be secured in time to meet the schedule outlined as part of this application.

If funding is not available at the beginning of the SOC process, the permittee must submit a copy of all funding applications to ensure that all efforts are being made to secure such funds.

Note: A copy of the application should be sufficient to demonstrate timeliness unless regional office has reason to request all information associated with securing funding.

THE DIVISION OF WATER RESOURCES WILL NOT ACCEPT THIS APPLICATION PACKAGE UNLESS ALL OF THE APPLICABLE ITEMS ARE INCLUDED WITH THE SUBMITTAL.

Required Items:

- a. One original and two copies of the completed and appropriately executed application form, along with all required attachments.
 - If the SOC is for a City / Town, the person signing the SOC must be a ranking elected official or other duly authorized employee.
 - If the SOC is for a Corporation / Company / Industry / Other, the person signing the SOC must be a principal executive officer of at least the level of vice-president, or his duly authorized representative.
 - If the SOC is for a School District, the person signing the SOC must be the Superintendent of Schools or other duly authorized employee.


Note: Reference to signatory requirements in SOC's may be found in the North Carolina Administrative Code [T15A NCAC 2H .1206(a)(3)].

- b. The non-refundable Special Order by Consent (SOC) processing fee of \$400.00. A check must be made payable to The Department of Environment and Natural Resources.
- c. An evaluation report prepared by an independent consultant with expertise in wastewater. (in triplicate)

APPLICANT'S CERTIFICATION:

(NO MODIFICATION TO THIS CERTIFICATION IS ACCEPTABLE)

I, Paul Draovitch, attest this application for a Special Order by Consent (SOC) has been reviewed by me and is accurate and complete to the best of my knowledge. I understand if all required parts of this application are not completed and if all required supporting information and attachments are not included, this application package may be returned as incomplete. *(Please be advised that the return of this application does not prevent DWR from collecting all outstanding penalties upon request).* Furthermore, I attest by my signature that I fully understand that an upfront penalty, which may satisfy as a full settlement of outstanding violations, may be imposed. {Note: Reference to upfront penalties in Special Orders by Consent may be found in the North Carolina Administrative Code [T15A NCAC 2H .1206(c)(3)].}

 Date 5/22/18
Signature of Signing Official

Paul Draovitch, Senior Vice President, Duke Energy
Printed Name of Signing Official

THE COMPLETED APPLICATION PACKAGE, INCLUDING THE ORIGINAL AND TWO COPIES OF ALL SUPPORTING INFORMATION AND MATERIALS, SHOULD BE SENT TO THE FOLLOWING ADDRESS:

NORTH CAROLINA DIVISION OF WATER RESOURCES
POINT SOURCE BRANCH
1617 MAIL SERVICE CENTER
RALEIGH, NORTH CAROLINA 27699-1617

IF THIS APPLICATION IS FOR A NON-DISCHARGE SYSTEM, THEN SEND TO:

NORTH CAROLINA DIVISION OF WATER QUALITY
AQUIFER PROTECTION SECTION
1636 MAIL SERVICE CENTER
RALEIGH, NORTH CAROLINA 27699-1636