

Luray RV Resort and Campground
Issuance of VPDES Permit No. VA0093165
Summary of Comments

Proposed Permit Action: New VPDES Permit No. VA0093165

Permittee: Camp Luray OPCO, LLC

Background:

On April 20, 2022, DEQ received an application for issuance of a Virginia Pollutant Discharge Elimination System (VPDES) permit to authorize the discharge of 50,000 gallons per day of treated sewage wastewater generated by a campground and RV park to the South Fork Shenandoah River. The application was technically complete on November 2, 2022.

The public's opportunity to comment on the draft permit was published in the *Page News and Courier* on December 22, 2022, and December 29, 2022. The notice was also distributed to e-mail and postal mail lists which included several environmental organizations and other members of the public who have expressed interest in receiving such notices. The public notice was posted on the DEQ website for the duration of the public comment period.

During the draft permit public comment period, it was evident that there was significant public interest in the draft permit. In light of this public interest, DEQ held an informational meeting on January 19, 2023, at the Luray Fire Hall. DEQ sent emails to the commentors inviting them to the informational meeting. In addition to DEQ staff, over 100 members of the public attended the meeting. The draft permit public comment period closed on January 23, 2023. During the public comment period of the draft permit, there were 137 commenters with 123 of the commenters requesting a public hearing.

Following the public comment period, it was determined that the statutory threshold for convening a public hearing for the proposed permit issuance was met. The notice seeking public comment and announcing a public hearing was published in the *Page News and Courier* on March 2, 2023, and March 9, 2023. The notice was also distributed to e-mail and postal mail lists which included several environmental organizations and other members of the public who have expressed interest in receiving such notices. The public notice was posted on the DEQ website for the duration of the public comment period.

Public Hearing:

At 6:30 pm on April 6, 2023, a public hearing was held at Luray High School, located at 243 Bulldog Drive, Luray, Virginia. Mr. Jerome Brooks, DEQ's Piedmont Regional Office Director, served as the hearing officer. An information briefing was conducted by DEQ staff immediately prior to the public hearing. Approximately 50 people attended the public hearing. Twenty-five (25) individuals provided oral comments during the public hearing. The draft permit public hearing public comment period opened on March 6, 2023 and closed on April 21, 2023. During the public comment period of the draft permit public hearing, there were 36 commenters, including the 25 individuals who provided oral comments during the public hearing.

Summary of Comments and DEQ Responses:

Staff reviewed all comments submitted during the public comment periods. The comments received in opposition to the draft permit were summarized and categorized according to issue as shown below along with responses prepared by DEQ staff.

Comment Category 1 – The South Fork Shenandoah River is already impaired, and authorizing an additional discharge will further impair the river.

Staff Response

The Virginia Water Quality Standards (WQS) regulation states, “all State waters ... are designated for the following uses: recreational uses, e.g., swimming and boating; the propagation and growth of a balanced, indigenous population of aquatic life, including game fish, which might reasonably be expected to inhabit them; wildlife; and the production of edible and marketable natural resources, e.g., fish and shellfish.” These WQS are adopted as regulation (9VAC25-260) and represent the best available science to ensure protection of water quality. All effluent limits included in the draft permit are designed to be protective of the WQS.

The WQS regulation establishes an in-stream level of E. coli bacteria at a geometric mean of fewer than 126 colony forming units per 100 mL as the level that will protect primary contact recreational uses, defined as “any water-based form of recreation, the practice of which has a high probability for total body immersion or ingestion of water” (e.g., swimming, water skiing, canoeing, kayaking, etc.). This in-stream concentration of E. coli has been imposed in the draft permit as the effluent limit meaning that the level that has been determined to be protective of primary contact recreational uses must be met in the effluent before the effluent is discharged to the South Fork Shenandoah River.

The original Bacteria Total Maximum Daily Load (TMDL) Development and Benthic Stressor Analysis for South Fork Shenandoah River that was approved by the EPA on December 3, 2009. The bacteria equation for that TMDL includes an allowance for future growth, meaning that the future growth amount is included the total amount of E. coli that the South Fork Shenandoah River was determined to be able to receive from all sources and still maintain the WQS. The amount of E. coli authorized to be discharged by the draft permit was taken from that future growth amount and will then not be available to be allocated for other future growth.

In the approved Bacteria TMDL Development and Benthic Stressor Analysis for South Fork Shenandoah River, it was stated that the general standard (benthic) impairment in the South Fork Shenandoah River may result from sediment and phosphorous contributions by impaired upstream tributaries. Based on the analysis provided in that report, implementation of TMDLs in the upstream impaired tributaries was expected to result in meeting water quality standards for general aquatic life in the South Fork Shenandoah River; therefore, no sediment or phosphorous load reductions were determined to be necessary in the South Fork Shenandoah impairment at that time.

The Virginia Department of Health, Office of Drinking Water – Lexington Field Office (VDH) indicated that the nearest downstream public water supply (PWS) intake is located approximately 48 miles from downstream of this proposed discharge. The South Fork Shenandoah River in the vicinity of Luray RV Park and Campground is not designated by the WQS as a PWS water; therefore, application of the PWS criteria is not applicable in this case.

The WQS regulation also establishes human health criteria for “All Other Surface Waters.” DEQ fully applied these “all other” human health criteria in its evaluation. The proposed effluent limits have been properly evaluated and applied to be protective of human health and aquatic life and will maintain all existing beneficial uses of the receiving stream.

Water monitoring staff from DEQ's Valley Regional Office are collecting data in 2023 from established stations on the South Fork Shenandoah River. A trend station is located just below the Rt. 211 bridge (1BSSF054.20), where nutrients, solids, hardness, ions, turbidity and bacteria samples are collected every other month. In addition, this station will be visited on a weekly basis for 12 weeks to monitor bacteria levels during the recreational season. Another trend station on the South Fork Shenandoah River is located in the town of Front Royal, at Luray Avenue (1BSSF003.56). The same parameters listed above are collected on a bimonthly basis, and this station will also be monitored for nuisance algae from May through October of 2023. More information on these stations and the 2023 DEQ Water Monitoring Plan, as well as previous stations and data can be found on the agency's GIS mapping page at: <https://apps.deq.virginia.gov/EDM/>.

Comment Category 2 – The nutrient trading agreement for the proposed discharge is not protective of local water quality in South Fork Shenandoah River.

Staff Response

§62.1-44.19:12-19 of the Code of Virginia requires owners of new facilities to obtain offsets for the nutrients discharged to state waters and to register for coverage under the General Permit for Total Nitrogen (TN) and Total Phosphorus (TP) Discharges and Nutrient Trading in the Chesapeake Watershed in Virginia (9VAC25-820-70). The applicant has entered into a nutrient trading agreement with the Town of Leesburg to obtain offsets for all nutrients discharged from Luray RV Resort and Campground and has submitted a registration statement for coverage under the General Permit for TN and TP Discharges and Nutrient Trading in the Chesapeake Watershed in Virginia.

The draft permit includes annual average concentration effluent limits for TN and TP that will ensure compliance with the General Permit. No trading is allowed to comply with the annual average concentration effluent limits for TN and TP contained in the draft permit.

The nutrient trading is required to meet a limit established to protect the Chesapeake Bay. There are no local water quality-based limits for nutrients in the draft permit; although the technology-based limits of TN = 8.0 mg/L and TP = 1.0 mg/L provide significant protection.

DEQ has been collecting data on filamentous algae since 2017 in response to each complaint received. The WQS regulation was recently amended to include new chlorophyll-a criteria for segments of the Shenandoah River. Segments that have data above the new criteria will be considered impaired which will initiate the TMDL process for that impairment. If a TMDL is established that requires further nutrient reductions, then these reductions would be incorporated into the permit.

Comment Category 3 – The RV resort and campground design characteristics may not have been clearly conveyed, the design of the wastewater treatment facility may need to be revisited, and DEQ does not have a technical review process.

Staff Response

The effluent limits were based on a design flow of 50,000 gallons per day (0.05 MGD). The effluent limits were developed such that they are protective of water quality if the permittee were to discharge 50,000 gallons per day every day of treated effluent over the 5-year term of the permit.

Ultimately, a wastewater treatment facility will need to be designed, installed, and operated to ensure compliance with final, approved effluent limits. The effluent limits are established to protect water quality and maintain beneficial uses of the receiving waters. DEQ does not prescribe the methodology by which the permittee is to comply with effluent limits. In accordance with the Sewage Collection and Treatment Regulation (9VAC25-790), the permittee is required to obtain a Certificate to Construct prior to constructing the wastewater treatment works and a Certificate to Operate prior to operating the wastewater treatment works. If a VPDES permit is issued, the owner of Luray RV Resort and Campground must comply with the permit's conditions and the Sewage Collection and Treatment Regulations (9VAC25-790). These regulations ensure that the design, construction, and operation of sewage collection systems and treatment works are consistent with the public health and water quality objectives of the Commonwealth of Virginia. Projects such as this wastewater treatment facility are not reviewed by DEQ for compliance with the design requirements of the Sewage Collection and Treatment Regulations. It is the responsibility of a licensed professional engineer in the Commonwealth of Virginia to certify that the project design adheres to the design requirements of the Sewage Collection and Treatment Regulations. This is done through the submission of an application for a Certificate to Construct. Following construction, submission of an application for a Certificate to Operate is required. On this application, a licensed professional engineer in the Commonwealth of Virginia must certify that all components have been installed in accordance with the approved plans and specifications. Upon commencing operation of the wastewater plant, wastewater quality is monitored as required by the permit to ensure protection of the stream quality, and the wastewater treatment facility is inspected by DEQ staff to ensure compliance with all permit requirements, including proper operation and maintenance.

The following information was provided by Racey Engineering:

“The wastewater treatment plant (wwtp) was sized under the Virginia Administrative Code Sewage Collection and Treatment Regulations. The code section categorizes sewage flows on a per campsite basis. Camps, resort day and night with limited plumbing – 50 gpd/site. Luxury camps with flush toilets – 100 gpd/site. If every site is considered a Luxury Camp, the value for the 370 approved sites = 37,000 gpd. Add the additional flow of 2800 gpd (staff, breakroom, welcome center bathrooms, and miscellaneous) yields a total of 39,800 gpd.”

Racey Engineering also indicated that higher wastewater loading concentrations were utilized in the design of the wastewater treatment facility as follows:

- BOD – 500 mg/L
- TSS – 250 mg/L
- Total Nitrogen – 90 mg/L

This facility is a sewage treatment works; however, it is not a Publicly Owned Treatment Works (POTW). There are no EPA-promulgated effluent limits for sewage treatments works that are not POTWs. In lieu of establishing case-by-case limits for this discharge in accordance with 40 CFR 125.3(d), the secondary treatment requirements specified in 40 CFR 125.3(a)(1)(i) have been applied. In addition, in accordance with 9VAC25-40-70, technology-based limits of TN = 8.0 mg/L and TP = 1.0 mg/L have been imposed which require treatment significantly beyond secondary treatment requirements.

Comment Category 4 – The wastewater treatment facility will be in the 100-year floodplain and may be adversely affected by flooding.

Staff Response

The proposed permit issuance does not specify where the treatment plant will be built, only where the outfall is to be located; however, the construction of this facility will be required to comply with all the relevant laws and regulations administered by DEQ. The Sewage Collection and Treatment Regulations (9 VAC 25-790) are very prescriptive regarding the siting and design of the wastewater treatment facility. According to these regulations, the treatment works site shall be located to avoid flooding. The regulations specify that, “All mechanical and electrical equipment that could be damaged or inactivated by contact with or submergence in water (motors, control equipment, blowers, switch-gear, bearings, etc.) shall be physically located above the 100-year level or otherwise protected against the 100-year flood/wave action damage. All components of the treatment works shall be located above or protected against the 25-year flood/wave action level and remain fully operational. Consideration should be given to designing the treatment works in such a way as to facilitate the removal of vital components during more extreme flood events.”

Based on information provided by Racey Engineering, the owner intends to site the WWTP approximately 10 feet above the FEMA-defined 100-year flood line and approximately 7.5 feet above the high-water line created by the effects of Hurricane Fran on September 7, 1996.

Comment Category 5 – The applicant should consider disposing the wastewater on their own property in a drain field or hauling the wastewater off-site.

Staff Response

There is no prohibition in state law or regulation against anyone applying for an individual wastewater discharge permit, even if an onsite alternative is available. If an application for a individual wastewater discharge permit is submitted and the proposal would be in compliance with local zoning ordinances, then DEQ has a legal responsibility to prepare a draft permit that would be protective of water quality. DEQ does not have the authority to force an applicant to choose a certain alternative. The applicant has the ultimate decision on spending their resources as long as the selected alternative meets all statutory and regulatory requirements.

Comment Category 6 – How compliance will be assessed and ensured at this wastewater treatment facility is not known.

Staff Response

All wastewater facilities are routinely inspected; however, DEQ inspectors have the authority to inspect a facility whenever they choose, at reasonable times. In addition, DEQ is committed to following up on any inquiries or complaints we receive regarding the facility's operation. DEQ inspection reports are public information and may be requested through a Freedom of Information Act request.

The VPDES program is a self-monitoring program under the Federal Clean Water Act. VPDES permittees are required to submit monthly Discharge Monitoring Reports to DEQ. These monitoring reports contain summaries of the facility's self-monitoring results and are reviewed by DEQ's compliance staff.

The draft permit requires the permittee to employ or contract at least one Class III licensed wastewater works operator for this facility. The license shall be issued in accordance with Title 54.1 of the Code of Virginia and the Board for Waterworks and Wastewater Works Operators and Onsite Sewage System Professionals Regulations. The Class III licensed operator requirement was established based on the criteria set forth in 18VAC160-30 and is considered to be adequate for this wastewater treatment facility that is designed to treat 50,000 gallons per day. The permittee will be expected to meet all requirements of the permit and any noncompliance will be addressed through DEQ's established compliance and enforcement procedures.

Comment Category 7 – Construction of the wastewater treatment facility is already occurring so further participation in the public hearing process has no purpose.

Staff Response

Camp Luray OPCO, LLC’s existing facilities are currently permitted by VDH in accordance with the Sewage Handling and Disposal Regulations (12VAC5-610 et seq.). On May 17, 2023, VDH issued a sewage disposal system construction permit that includes authorization to construct the new wastewater treatment facility. The discharge of treated wastewater to state waters must be authorized by DEQ through issuance of a VPDES permit prior to the discharge occurring. Construction of the wastewater treatment facility is not a determining factor in the issuance of the VPDES permit.

Comment Category 8 – General request for a public hearing

Staff Response

A public hearing was held on April 6, 2023.

Commenter Listing

The table below lists the commenters who submitted comments during the public comment periods and includes the category or categories of comments associated with each commenter.

Comments Submitted During Public Comment Period In Opposition to the Draft Permit December 22, 2022 – January 23, 2023 March 6, 2023 – April 21, 2023			
Name	Type	Date Received	Categories
Ames, Eleanor	Written	1/3/2023	1, 2
Andreae, Fred and Christine	Written	4/7/2023	2
Armstrong, Matt	Written	1/22/2023	2
Atwood, Paula	Written	1/17/2023, 1/23/2023	1, 2
Bailey, Cassie	Written	4/8/2023	1
Bartholomew, Francoise and Herbert	Written	1/9/2023, 1/22/2023	1, 2, 3, 4, 6
Boyer, Nancy	Written	1/6/2023	1, 2
Breivik, Don	Written	1/22/2023	1
Browne, Riley	Written	1/23/2023	3, 5, 6
Buracker, Ronald	Written	1/19/2023	8
Bullock, Janet	Written	1/19/2023	8
Canaday, Chris	Written	1/11/2023	1, 2
Canaday, Lauren	Written	1/12/2023	1, 2

Name	Type	Date Received	Categories
Christopher, Amy	Written	1/23/2023	3, 4, 6
Coleman, Vanessa	Written	1/21/2023, 4/17/2023	1, 2, 6, 8
Cooper, Dylan	Written	1/23/2023	1, 2, 3, 4, 6, 7
Coppola, Teresa and Roberto	Written	1/23/2023	1, 2, 3, 4, 6
Corbett, Susan	Written, Oral Comment at Hearing	1/23/2023, 4/6/2023	1, 2, 3, 4, 5, 6
Core, Steve	Written	3/24/2023	1, 2, 3, 4, 5, 6
Cubbage, Bennie	Written, Oral Comment at Hearing	1/20/2023, 4/6/2023, 4/19/2023	1, 2, 3, 4
Cullers, Steven	Oral Comment at Hearing	4/6/2023	2
Daniels, Will	Written	1/7/2023, 1/20/2023	4, 8
Davis, Sandy	Written	1/10/2023	1
Dedman, John and Marcia Kaetzel	Written	1/20/2023	1
Demarest, David	Written	1/23/2023	1, 2, 4
DeMott, Darlene	Written	1/6/2023	1, 2
deSerio, Frank and Monica	Written	1/9/2023	2
Dever, Jim	Written	1/22/2023	1, 2
Dingess, Cody	Written	1/19/2023	8
Driver, Becky	Written	1/19/2023	2
Dodson, Terry	Written	1/19/2023	8
Edmonds, James and Julie	Written	1/3/2023	1, 2
Elik, Johanna	Written	1/6/2023	1, 2
Finlay, Susan and Sam	Written	1/10/2023, 1/19/2023	1, 8
Fitzgerald, Debbie	Written	1/8/2023	1, 2
Ford, Sherry	Written	1/17/2023, 1/19/2023	1, 2, 8
Ford, Tom	Written	1/20/2023	5, 6
Frondorf, Mark (on behalf of Shenandoah Riverkeeper)	Written, Oral Comment at Hearing	1/19/2023, 1/23/2023, 4/6/2023	1, 2, 6, 8
Gander, Lisa	Written, Oral Comment at Hearing	1/19/2023, 1/20/2023, 1/22/2023, 4/6/2023	3, 4, 6
Garrett, Kris	Written, Oral Comment at Hearing	1/19/2023, 4/6/2023	7, 8
German, Barbara	Written	1/5/2023	2
Gibson, John	Oral Comment at Hearing	4/6/2023	1
Gillen, Mary Helen	Written	1/10/2023	1, 2

Name	Type	Date Received	Categories
Goebel, Andrea	Written	1/21/2023	1, 2
Goebel, Derek	Written	1/22/2023	1, 2, 6
Goebel, Nancy	Written	1/23/2023	1
Grant, Gary	Written	1/19/2023	8
Grant, Suzanne	Written	1/19/2023	3, 4, 8
Graves, Isabel	Written	1/19/2023	8
Graves, Rod	Written	1/19/2023	8
Green, Catherine	Written	1/19/2023	8
Grosso, Gina	Written	1/9/2023	8
Gubler, Rolf	Written	1/21/2023	1, 2
Hadeler, Shelby	Written	1/9/2023	1, 2
Halpern, Samuel	Written	1/6/2023, 1/20/2023, 1/21/2023	1, 2, 3, 4, 5, 6
Hastings, Brian	Oral Comment at Hearing	4/6/2023	1
Healy, Monique	Written	1/8/2023	1, 2
Heckert, Carleen	Written	1/19/2023	8
Heckert, Scott	Written	1/20/2023	1, 2
Herbert, Cathy	Written	1/4/2023, 1/19/2023	1, 2, 3, 8
Holmes, Karen	Written	1/23/2023	3, 6
Holsinger, Brad	Written	1/19/2023, 1/23/2023	3, 6, 8
Holsinger, Chester	Written	1/19/2023	8
Huffman, Mary	Written	1/22/2023	1, 2
Jemielity, Ken	Written, Oral Comment at Hearing	1/20/2023, 4/6/2023	1, 2
Jenkins, David	Written	1/19/2023	8
Jobe, Cindy	Written	1/19/2023	8
Johnson, Ken	Written	1/19/2023	8
Johnston, Charleen	Written	1/6/2023	2
Judd, R.J.	Written	1/19/2023	8
Kale, Rebecca	Written	1/10/2023	1, 2, 8
Kelly, Tom	Written	1/19/2023	8
King, Lucia	Written, Oral Comment at Hearing	4/6/2023	1, 2, 4
King, Lucia and Bill	Written	1/6/2023	1, 2
Kinneary, Joseph	Written	1/21/2023, 1/22/2023	1, 3, 6

Name	Type	Date Received	Categories
Krasovec, Katherine	Written	1/23/2023	3
Kresse, Laura	Written	1/7/2023, 1/19/2023	1, 2, 8
Lamb, Sharon	Written	1/11/2023	1, 2
Leicher, Tracy	Written	1/19/2023	8
Lewis, Liz	Written	1/19/2023	8
Liscomb, Dawn	Written, Oral Comment at Hearing	1/22/2023, 4/6/2023	3, 4, 6, 7
Logan, Julie	Written	1/5/2023	2
Lorien, Joy	Written	1/22/2023	1, 2, 4, 7
Mack, Lesley	Written	1/4/2023, 1/20/2023, 1/22/2023	1, 2, 5, 8
Mack, Tom	Written	1/7/2023	8
Mangum, Jane	Oral Comment at Hearing	4/6/2023	1
Martin, China	Written	1/11/2023	8
McCreedy, Cliff	Oral Comment at Hearing	4/6/2023	1, 2
McNemar, Gladys	Written	1/23/2023	1, 2, 3, 4, 6
Meyer, Jess	Written	1/15/2023	2
Meyer, Mia	Written	1/15/2023	2
Michaud, Jayne	Written	1/19/2023	1, 2
Miller, Howard	Written	1/18/2023, 4/10/2023	1, 2
Mitchell, Donna	Written	1/20/2023	1
Morimota, Miles	Written	1/19/2023	8
Morrow, Jill	Written	1/23/2023	1
Murray, Ann	Written	1/21/2023	1, 2, 5
Newton, Charles	Written, Oral Comment at Hearing	1/19/2023 1/22/2023, 4/6/2023	1, 2, 6, 8
Orenic, Chuck	Written	1/19/2023, 1/21/2023	3, 4, 6, 8
Orenic, Jennifer	Written	1/19/2023, 1/21/2023	1, 2, 3, 4, 6, 8
Pingry, Bob	Written	4/6/2023	1, 2
Price, Del	Written	1/20/2023	3, 6, 7
Reynolds, Kathleen	Written	1/20/2023	1
Richardson, Charles	Written	1/10/2023	8
Richey, Bob	Written	1/7/2023	1, 2
Rocke, Susan	Written, Oral Comment at Hearing	1/22/2023, 4/6/2023	1, 2, 3, 4, 6, 8

Name	Type	Date Received	Categories
Rocke, Timothy	Written, Oral Comment at Hearing	12/26/2022, 1/2/2023, 1/22/2023, 4/6/2023	1, 2, 3, 4, 5, 6, 8
Rooks, Caley	Written	1/7/2023	2
Rooks, Rodney	Written	1/7/2023, 1/19/2023	1, 2, 8
Rosati, Ruth	Oral Comment at Hearing	4/6/2023	1
Rowles, Jackie	Written	1/23/2023	1, 6
Rowles, Mark	Written	1/23/2023	1, 6
Rowles, Michael	Written	1/23/2023	1, 6
Rowles, Shari	Written	1/22/2023	1, 6
Sadove, Elizabeth	Written	1/19/2023	8
Sansoni, Tom	Written	1/20/2023	1, 2, 3, 4
Scalet, Ken	Written	1/6/2023, 1/19/2023, 1/20/2023	1, 2, 3, 4, 5, 6, 8
Schaffler, Robin	Written	1/12/2023	1
Schmidt, Bette	Written	1/4/2023	1, 2
Siebens, Nina	Written	1/22/2023	3, 4, 6, 8
Sites, Mary Ann	Written	1/23/2023	8
Smith, Bob	Written	4/21/2023	1
Smith, Carl	Written	1/7/2023	1, 2
Smith, Geraldine	Written	1/22/2023	1, 2, 3, 4, 6
Smith, Sam and Denise	Written	1/11/2023	1, 2
Snider, Beth	Written, Oral Comment at Hearing	1/22/2023, 1/23/2023, 4/6/2023	1, 2, 7, 8
Sokol, Katie	Written	1/10/2023	1, 2
Sottosanti, Cara	Written, Oral Comment at Hearing	1/22/2023, 4/6/ 2023	1, 2, 3, 4, 6, 7
Sottosanti, Nancy	Written	1/23/2023	3, 6
Sours, Carla	Written	1/17/2023	1
Spencer, Ashleigh, Eloise, and Evangeline	Written	1/21/2023	6
Spring, Peter	Written	1/9/2023	1, 2
Steliga, John	Written	1/22/2023	3
Stone, Shelby	Written	1/15/2023	2
Strickler, Eddie	Written	1/19/2023	8
Stromberg, Richard and Sybille	Written	1/9/2023	2
Suddith, C.R., Jr.	Written	1/19/2023	8

Name	Type	Date Received	Categories
Swann, Lyndsey	Written	1/9/2023	1, 2
Taggart, Robert	Written	1/19/2023, 1/20/2023	1, 2, 6, 7
Thorpe, Eudora	Written	4/21/2023	1, 5
Wald, Penny and Mitch	Written	1/21/2023, 3/7/2023	1, 2, 6
Wales, Denise	Written	1/7/2023	1, 2
White, Alex	Written	1/19/2023	8
Whitmire, Richard	Written	1/18/2023	1, 2
Williams, Francy	Written	1/19/2023	8
Winter, Bryan	Written	1/23/2023	1, 2
Winter, Deborah	Written	1/23/2023	1, 2, 3, 6
Wolz, Catherine	Written	1/16/2023	2
Womack, Chap	Written	1/22/2023	1, 2, 3
Wright, Kim	Written	1/19/2023	8
Zottig, Alice	Written	1/15/2023	2
Zottig, Jessica	Written, Oral Comment at Hearing	1/20/2023, 1/21/2023, 4/6/2023	1, 2, 8

**Comments Submitted During Public Comment Periods In Support of the Draft Permit
 December 22, 2022 – January 23, 2023
 March 6, 2023 – April 21, 2023**

Name	Type	Date Received
Bell, Clifton (Brown and Caldwell)	Written	4/7/2023
McWilliams, Jesse (Brown and Caldwell)	Oral Comment at Hearing	4/6/2023
Plum, Brian	Oral Comment at Hearing	4/6/2023
Racey, Patrick (Racey Engineering)	Oral Comment at Hearing	4/6/2023
Rhinehart, Kim (General Manager, Luray RV Resort and Campground)	Oral Comment at Hearing	4/6/2023
Stroupe, Mark (Page County District 3 Board of Supervisor)	Oral Comment at Hearing	4/6/2023