



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

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**SUBJECT:** DRAFT 2nd Technical Advisory Committee (TAC) Meeting to Discuss the 2013 Reissuance of 9VAC25-193 General Virginia Pollutant Discharge Elimination System (VPDES) Permit Regulation for Concrete Products Facilities

**TO:** TAC Members and DEQ Staff (listed below)

**FROM:** Elleanore Daub, VPDES DEQ Central Office

**DATE:** June 7, 2012

A TAC meeting was held on May 7, 2012 at the DEQ Piedmont Regional Office. The meeting began at 10:00 AM. The TAC members attending the meeting were:

Name	Organization
Walter Beck	Vulcan Materials
Cliff Bocchicchio	Titan
Tom Foley	Vulcan Materials
David Holsinger	Precast Concrete Association of Virginia
Todd Legge	Essroc Ready Mix
Jay Lipscomb	Branscome
Fred Cunningham	DEQ - CO VPDES
Elleanore Daub	DEQ - CO VPDES
Burt Tuxford	DEQ - CO VPDES

### Other DEQ Staff Participating

Janine Howard	DEQ – PRO
Carl Thomas, Steve Long	DEQ – TRO
Alison Thompson	DEQ – NRO
Kathleen OConnell	DEQ - CO Enforcement
Mark Trent, Jason McCroskey	DEQ – SWRO by conf. call
Bob Tate and Gerry Duff	DEQ – BRRO by conf. call

Items presented prior to the meeting for discussion were:

- General Agenda
- 2009 VPDES Industrial Storm Water General Permit (VAR05)- Storm Water Pollution Prevention Plan (SWPPP) Requirements

- Draft Regulation with amendments dated May 29, 2012

Discussion (not necessarily in order)

There were no objections to the May 1, 2012 meeting summary. This will be finalized on the Town Hall web site.

Storm Water Management -

Representative Outfalls - concerns from staff were raised regarding representative outfalls and how they are determined. Concerns from the industry were raised regarding the need for drainage area information. Staff suggested listing in the registration statement the representative outfall and describing the activities of the other outfalls and why they are similar to the representative outfall. These questions are in the non-metallic mineral mining general permit registration statement. The industry explained there are very few representative outfalls and this extra step was unnecessary.

Sampling Waivers - consider adding a waiver for inactive and unstaffed facilities per the Industrial Storm Water General Permit (ISWGP) Part I A 1 a (4). Consider adding documentation explaining a facility's inability to obtain a sample to the Storm Water Pollution Prevention Plan (SWPPP) per the ISWGP Part I A 2 d.

Storm water Part I A 3 monitoring collection instructions need to reflect the current multi-sector storm water permit at 9VAC25-151-70 Part I A 2 b. (When and How to Sample) (i.e. remove references to storm events greater than 0.1 inches throughout concrete permit).

Several paragraphs with regards to sampling waivers and representative in the quarterly visual examination requirement can probably be eliminated and covered under one sampling waiver section. Requests were heard to add inactive and unstaffed site waivers and to include documentation requirements when a sample cannot be taken due to lack of rain (no measureable storm event) per the ISWGP.

Several other paragraphs were redundant and the TAC agreed could be deleted (inventory of exposed materials, risk identification and summary of potential pollutant sources, selection of BMPs shall take into consideration (list of suggestions), recordkeeping and internal reporting procedures).

Staff requested CEDS be changed to better handle situations where DMRs are not needed at inactive sites or when DMRs need to be reactivated.

There was disagreement as to whether routine facility inspections needed to be conducted during a storm water discharge/rain event. The industry maintained that this was a routine inspection of BMPs and not done in the rain. Visual examinations were done in the rain to see the effectiveness of the BMPs and it was not appropriate for routine inspections to be done during a storm event. Staff maintained that conditions are different during a storm event and BMPs should be inspected working during a rain event. Also that visual examinations may be done only at representative outfalls and the routine facility inspections goes to all areas. Suggestions

were heard to make the routine inspection during a storm water discharge, when feasible, practical or possible.

The reasoning for iron monitoring was questioned by the industry and a request for staff to determine its basis. NOTE: Staff checked and has determined that the iron limit was taken from the 2000 EPA Multi-sector Industrial Storm Water General Permit benchmark monitoring cut-off concentrations and is based on chronic aquatic toxicity EPA 1976 water quality criteria recommendations. DEQ has not adopted this aquatic life criterion. However, this benchmark monitoring continues in the 2009 multi-sector permit and is repeated in many sectors. In the 2003 reissuance of this permit, total recoverable iron monitoring was added and COD monitoring was deleted. A query of DMR data from the past five years showed that iron concentrations are frequently above the bench mark monitoring concentration of 1.0 mg/l. It was noted these high concentrations may be due to naturally occurring levels in the soil. There is no iron content in concrete.

The appropriateness of the DRO (diesel range organics) only TPH method was discussed. The industry indicated that diesel was the fuel used on site and therefore DRO only is appropriate. The TAC agreed to meet in mid July for the next meeting which was later decided to be on July 10, 2012 at the Piedmont Regional Office, 10 AM - 3:00 PM.

Thanks to all the TAC members for their continued service.