

Summary of Activities of the Technical Advisory Committee for the Reissuance of the General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests (VAG83)

Third Meeting - February 16, 2012

Items presented for information and discussion prior to the meeting were:

- Meeting Agenda
- 9VAC25-120, General VPDES Permit Regulation for Discharges From Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests (VAG83) - 3rd Draft of the Regulation with changes to discuss.

The TAC discussed the 3rd draft of the regulation and the changes that were presented:

Registration Statement (RS) Section

- TAC suggested that we add the "Discharging to an MS4?" question to the RS. We will add that to the RS, similar to the Vehicle Wash GP question.
- New Section A (Owners not required to submit a RS) - TAC discussed whether we want DMRs submitted for these discharges. It was decided that we do not want them submitted, just maintained on site. The section will be revised accordingly.
- Section A.1.e - add "including aquifer tests" after "pilot tests". OK.
- Section D.9 - we added wording for linear projects to this draft. TAC discussed whether we need to increase the monitoring frequency for these projects. TAC decided that they know the discharge points up front, so the RS requirement is OK, and we do not need additional monitoring.

Other Suggested Changes to the Regulation Section

- Section 20, Purpose - The TAC suggested that we put "conducting aquifer tests to characterize site conditions" back in to the first paragraph. We will put that back in.

Effluent Limitations and Monitoring Requirements - New Part I.A.1

- TAC discussed the proposed new section. TAC decided that we should have all these short term projects sample, but no DMR would need to be submitted. The DMR would be maintained on site/at the office. They would only need to take one sample of their effluent.
- There was a concern regarding dewatering projects pumping too much water and causing erosion or downstream problems. It was decided that we should put some language in the permit to say they can't cause erosion downstream. Trevor Wallace, VRO has some criteria they use to restrict impacts that he will send to us.
- Short term projects monitoring - the TAC requested that we put something in the permit for retention of these records (DMRs). It was suggested that we require them to keep the records for three years. Staff will look at the ISW GP similar requirement and add some wording to the permit.

Effluent Limitations and Monitoring Requirements - Part I.A.2 - Gasoline Contamination

- The TAC discussed the currently proposed removal of lead from the monitoring requirements, and whether we would have problems with EPA regarding anti-backsliding restrictions. It was felt that anti-backsliding only applies to specific permits. If we take lead out, we can do it if we are not violating water quality standards. Perhaps since we are permitting lead scavengers we are OK removing the lead monitoring. Staff will look into this further. *[Note: upon further staff review, it was decided that anti-backsliding would apply, and lead was put back into the monitoring requirements.]*
- TAC discussed whether we still need to monitor for TPH. The TAC questioned why we limit THP at 15 mg/l when we have naphthalene limits much lower. Staff explained that there are situations where it is appropriate to limit TPH, depending on what they are treating for.

There were no issues on which the committee was unable to reach consensus.

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