

MEMORANDUM


34 pages

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

WATER DIVISION

SUBJECT: OWRM Guidance Memo No. 93 - 026 Amendment No. 1
Permitting Strategy for Wood Preserving Operations

TO: Regional Directors

FROM: OWRM -  Larry G. Lawson, P. E.

DATE: October 11, 1994

COPIES: Robert Burnley, James Adams, HQ Water Permits Staff,
HQ Waste Division

Guidance

Eliminate the special condition requirement for the treated wood to be retained on the drip pad for a minimum of 48 hours before being removed to the storage area. Replace this condition with a condition that requires the treated wood to be held on the drip pad until drippage has ceased.

Background

OWRM Guidance Memo No. 93 - 026 recommended that VPDES and VPA permits issued to Wood Preserving operations contain a special condition that required the treated wood to be retained on the drip pad for a minimum of 48 hours before being removed to the storage area. This has been a recommendation for approximately the last 11 years. (Note: this has been a recommendation and has not been based in specific regulation other than our general authority to have such BMP requirements in permits). With the promulgation of specific drip pad requirements under RCRA/CERCLA, specifically Subpart W of 40 CFR Parts 264 and 265 we believe it is appropriate to revise Guidance 93 - 026 to be consistent with these regulations. The promulgated regulations have a specific requirement which states that the treated wood must be held on the drip pad until drippage has ceased. Since there are no specific timeframes involved in this specific regulation, it is believed that our permitting strategy should be revised accordingly.

Revised pages are attached. The pages affected are pages 16 and 17 in the existing guidance. The old language is lined through and the new language is found after the lined through language. The new language is italicized. Everything else on the pages remains unchanged. Please make the appropriate changes in the existing guidance.

If there are any questions please contact Fred Holt at (804) 527-5075.

The owner shall operate the facility in accordance with the approved O & M Manual. This manual shall include, but not be limited to:

- a. techniques to be employed in the collection, preservation, and analysis of (**effluent**), and (**groundwater**) samples;
 - b. discussion of routine preventative maintenance tasks;
 - c. a Facility Closure Plan.
5. ~~Operations shall be conducted in such manner that treated lumber will be retained on the drip pad for a minimum of 48 hours before being removed to the treated wood storage area. Treated wood shall be held on the drip pad until drippage has ceased.~~

6. Quantification Levels

- a. Quantification Level Goals shall be as follows:

<u>Effluent Characteristic</u>	<u>Quantification Level (ug/l)</u>
XXX	---

- b. **(USE WHERE APPLICABLE)** The permit limitation for (XXX) is lower than the quantification level required. The quantification level required shall be considered as the threshold for compliance determinations.
- c. Where a permittee conducts monitoring once per month or more and all values obtained are less than the required quantification level or "not detected" at the required quantification level, an "NQ" should be reported on the Discharge Monitoring Report (DMR). "NQ" means not quantifiable at the level required by this permit.

7. (TMP Requirements)

(VPA Permit)

B. Other Requirements or Special Conditions

1. There shall be no discharge of pollutants to surface waters from this operation except in the case of a 25 year-24 hour or greater storm event. The operation of the facilities of the owner permitted herein shall not contravene the Water Quality Standards, as adopted and amended by the Board, or any provision of the Water Control Law.
2. **(For Facilities with Materials Storage)**
Any and all product materials, industrial wastes, and/or other wastes resulting from the purchase, sale, mining, extraction, transport, preparation, and/or storage of raw or intermediate materials, final product, by-product or wastes, shall be handled, disposed of, and/or stored in such a manner so as not to permit a discharge of such product, materials, industrial wastes, and/or other wastes to State waters, except as expressly authorized.
3. The owner shall develop an Operations and Maintenance (O&M) Manual for the facility permitted herein. This manual shall detail practices and procedures which will be followed to ensure compliance with the requirements of this permit. The manual shall be submitted for staff approval within 90 days of the **(effective/modification)** date of this permit **(and approved prior to start-up of operations)**. The owner shall operate the facility in accordance with the approved O & M Manual. This manual shall include, but not be limited to:
 - a. techniques to be employed in the collection, preservation, and analysis of **(groundwater)**, and **(surface water)** samples;
 - b. discussion of routine preventative maintenance tasks;
 - c. a Facility Closure Plan.
4. ~~Operations shall be conducted in such manner that treated lumber will be retained on the drip pad for a minimum of 48 hours before being removed to the treated wood storage area. Treated wood shall be held on the drip pad until drippage has ceased.~~