



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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SUBJECT: 2nd Technical Advisory Committee (TAC) Meeting regarding 9
VAC 25-115 General Virginia Pollutant Discharge Elimination System (VPDES)
Permit for Seafood Processing Facilities

TO: TAC Members

FROM: George Cosby, Regulatory Affairs

DATE: April 20, 2010

A TAC meeting was held on April 14, 2010 at DEQ Central Office. The meeting began at 1:00 PM. The TAC members attending the meeting were:

Heather Lusk	H. M. Terry Co., Inc.
Deanna Austin	DEQ-TRO by Telephone
Elleanore Daub	DEQ-CO
Fred Cunningham	DEQ-CO
Burton Tuxford	DEQ-CO
George Cosby	DEQ-CO
Jeremy Kazio	DEQ-PRO by Telephone

Comments and items presented at the meeting were as follows:

Elleanore Daub explained the revisions in the draft Seafood Processing Facilities GP Regulation distributed to the TAC members on April 9, 2010. The changes involved items discussed at the previous TAC meeting such as the effective and expiration dates; the revision of definition of Seafood Processing Facility; definition of total maximum daily load, authorization to discharge and the rewording of the registration statement section.

In the authorization to discharge section, a paragraph was added to allow for continuation of permit coverage when appropriate. The group discussed and decided the date for submitting a complete registration statement in order to get continuation of a permit coverage date should be the expiration date of the permit since the permit specifies that the Board cannot grant permission for registration statements to be submitted later than the expiration date of the existing permit.

In the Registration Statement section a paragraph was added to specify that late registration statements are allowed but the department still reserves the right to take enforcement action for unpermitted discharges. The relationship between this paragraph, continuation of permit

coverage and duty to reapply were discussed and it was decided that DEQ staff would think about the addition further before finalizing.

DEQ staff mentioned that the instructions for the use of chemicals at the facility associated with the registration statement may need clarification.

It was decided that the numerical limitations should reflect the effluent guidelines which are generally 2 significant digits instead of 3. This also follows existing agency policy.

DEQ staff was asked to review discharge monitoring activity and make a recommendation as to whether the existing monitoring frequency should be reduced. They found that there were occasional excursions above TSS limits and some instances of non-reporting of data. Also, we received comment from the industry during the NOIRA that agreed with the frequencies in the permit. Therefore, staff has no overriding reason to adjust the monitoring frequencies at this time.

A special condition no. 7.compliance reporting and recordkeeping was added to provide quantification levels for BOD; TSS and Oil and Grease. Special condition no.8 was added to address water quality standards. Special condition no. 9 was added to address the requirement for an amended registration statement if new processes are used.

Part II Storm Water Pollution Prevention Plans was updated to include the EPA requirements from the storm water general permit regulation on site description; a revision of the list of potential pollutant sources and the rewording of BMP section to make it clearer.

The TAC members agreed that additional TAC meeting were not necessary. Further discussions if needed could be handled by telephone or email.

The TAC members decided this regulation should be presented at the June Board meeting.

Items presented at the TAC meeting are as follows:

- A. 2010Draft: 9VAC25-115 – General Virginia Pollutant Discharge Elimination System Permit for Seafood Processing Facilities - brt.
- B. Daub explanation on revision to the REG.

I wish to thank the TAC members for their continued service on the TAC.