



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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SUBJECT: 2nd Technical Advisory Committee (TAC) Meeting regarding
9VAC25-194 General Virginia Pollutant Discharge Elimination System (VPDES)
Permit for Car Wash Facilities

TO: TAC Members

FROM: George Cosby, Regulatory Affairs

DATE: April 26, 2011

A TAC meeting was held on April 20, 2011 at DEQ Central Office. The meeting began at 1:00 PM. The TAC members attending the meeting were:

Name	Organization
Bob Schrum	Flagstop Corporation
Emilee Carpenter	DEQ – PRO
Elleanore Daub	DEQ – CO
Frederick Cunningham	DEQ – CO
Burton Tuxford	DEQ – CO
Mark Trent	DEQ – SWRO by conf. call
Debra Thompson	DEQ – TRO by conf. call
Becky France	DEQ – BRRO by conf. call
Joan Crowther	DEQ – NRO by conf. call
Dawn Jeffries	DEQ – VRO by conf. call

Items presented prior to the meeting for discussion were:

- Agenda Car wash TAC, April 20, 2011
- Amendments to the Regulation: 9VAC25-194, General VPDES Permit for Car Wash Facilities
- Regional Comments from BRRO and PRO
- The NOIRA comment received from Jesse Maines of the City of Alexandria

Comments expressed at the meeting:

- Consider including tractor trailers as one of the vehicles allowed for coverage. Questions frequently arise about this and would prefer it to be clear.
- Floor washing activities are included but vehicle maintenance areas should be segregated. May need to exclude floor washing from vehicle maintenance areas but they may exclude

the crash testing facility for which the allowance was added. CO will check on status of crash testing facility discharge. May need to define vehicle maintenance (check industrial storm water permit)

- In deadlines (section 60 A 2 d), specify the >5,000 increase flow notification is specific to vehicle wash facilities.
- Add a question to registration about whether the discharge is to an MS4 and add to instruction on registration that they are required to contact the locality if they discharge to an MS4.
- The TAC discussed whether or not to include chlorides, total phosphorus (TP) or nonylphenol (surfactant) to the permit. For TP, it might be easier to just 'ban' the use of phosphate detergents in the permit. A suggestion was made to email the largest detergent companies to see how a TP or nonylphenol' detergents 'ban' in this permit will affect them. Regarding chlorides, chlorides will be found only in car wash effluent in the winter after snow/ice when flows are high. Also, the level entering the stream is small compared to what will be running off the roads. The general consensus was that a chloride limit in the permit was unnecessary.
- The TAC agreed one set of special conditions for vehicle wash and laundry facilities was appropriate.
- The TAC agreed the O&M manual requirement does not need to be submitted to DEQ but should be available upon request. To ease the burden on the car wash facilities (for which this is a new requirement), DEQ could put an example or template O&M manual on the web site. These do not need to be complicated.
- Add oil and grease quantification level (5.0 mg/l) to the compliance reporting special condition.
- Surfactants were further discussed and CO agreed to see if any special conditions had been written to address these.
- A request was made to include a 'de minimus' exemption under certain conditions.
- The TAC discussed who should have responsibility to apply for permit coverage and who has responsibility when unauthorized vehicle wash water is discharged to surface water in (owner vs. operator). As far as who applies for permit coverage, it seemed to the group that in the situation where a fleet vehicle owner hires a mobile car wash, then the owner is responsible (e.g. rental car agencies, automotive dealerships) for obtaining the permit when there is a discharge. In the instance where a car wash leases property to operate their business, it seems more likely the operator would obtain the permit when there is a discharge. Some discussion of this should go in guidance. CO will consult with enforcement before putting anything in guidance. NOTE: Since this meeting CO staff has learned that both owner and operator could be held responsible in the case of an adverse incident to surface water when the car wash is operating without a permit.

The TAC member's next meeting will be on May 25, 2011 at 1:00 pm at the same location. The meet-me conference telephone number for this meeting will be 804/698-4508.

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