



# COMMONWEALTH of VIRGINIA

## DEPARTMENT OF ENVIRONMENTAL QUALITY

Street address: 629 East Main Street, Richmond, Virginia 23219

Mailing address: P.O. Box 1105, Richmond, Virginia 23218

TDD (804) 698-4021

[www.deq.virginia.gov](http://www.deq.virginia.gov)

Douglas W. Domenech  
Secretary of Natural Resources

David K. Paylor  
Director

(804) 698-4020  
1-800-592-5482

SUBJECT: 3<sup>rd</sup> Technical Advisory Committee (TAC) Meeting regarding 9VAC25-194  
General Virginia Pollutant Discharge Elimination System (VPDES) Permit for Car Wash  
Facilities  
TO: TAC Members  
FROM: Elleanore Daub, Office of Water Permits and Compliance Assistance  
DATE: June 14, 2011

A TAC meeting was held on May 25, 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:

- Minutes from the 2<sup>nd</sup> Car Wash TAC meeting held on April 20, 2011
- Amendments to the Regulation: 9VAC25-194, General VPDES Permit for Car Wash Facilities (2<sup>nd</sup> Draft)

The group discussed the following items:

- Vehicle maintenance definition was added to clarify that these types of wash waters were not covered under the permit. The crash testing facility floor washing waters that CO was originally trying to get covered under the permit no longer needs a permit as their floor wash waters were approved to go to their drainfield by the VDH so the concern of defining vehicle maintenance excluding the crash testing facility from coverage is gone.
- Vehicle wash definition was revised to include tractor trailers for coverage as was requested by the TAC. The TAC discussed whether tanker trucks should be included for coverage. Tanker trucks can often contain hazardous chemicals, fertilizers and oils. It was acknowledged that some tanker trucks, would be non-hazardous (e.g. milk tanker trucks) but since there haven't been requests to cover these types of vehicles, it was determined to exclude tanker trucks from coverage.
- The requirement for connection to central sewage was discussed. One discussion item was that the language needed to say the central sewage was reasonably available or a local ordinance required a connection to the central sewer. It was noted to keep these two requirements as stand alone because if the local ordinance requires the connection we shouldn't issue coverage. If the locality would accept the general permit coverage as an 'existing treatment system' and therefore a substitute for a connection, then we would have to look at the reasonableness of the situation. One example of an unreasonable situation would be if the county has a central sewage (but not required by county to connect) and in order to connect the facility needs to build expensive infrastructure (e.g. a pump station). That would constitute a great expense and unreasonable. A reasonable situation is if the domestic waste at the facility is already connected to the central sewer and the locality can accept the additional dilution. Suggestions were made to add a special condition in the permit that repeats the requirement in the regulation found at section 50 C that approval for coverage under this general permit does not relieve any owner of the responsibility to comply with any other federal, state or local statute, ordinance or regulation and/or to require the permittee to prove the central sewer connection is unreasonable. It was also suggested to add this reminder to the registration statement. Finally, we need to discuss with policy or enforcement that we have the authority to require this. POST NOTE: CO has reviewed the language of this central sewer connection requirement in the VPDES General Permit for Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests permit for use in the car wash permit with policy office. We do have authority to include a requirement like this.
- It was decided that asking for lat/longs on the registration statement would not be useful. Perhaps asking for a better explanation of the receiving stream would be better.
- Consider adding enterococci and fecal coliform so that laundries to saltwater can be covered (currently there is only one laundry permit and it's not to saltwater). CO will check the Single Family Home Domestic Sewage <1,000 GPD general permit to see how those limits pages are set up.
- It was suggested to change all the flow units to GPD instead of MGD.
- The phosphate restriction in the draft was discussed. It was suggested that the definition of phosphate detergents in this special condition remove the restriction that phosphate detergents are zero percent phosphorus by weight and only contain phosphorus that is incidental to manufacturing. This is because one of the major chemical companies do add minute amount of phosphorus for anti-scaling but the amounts fall under .5 percent.

Staff needs to discuss this restriction with policy staff to make sure we are authorized to include such a restriction. POST NOTE: We are authorized.

- It was decided that it was too early to try to address emerging pollutants (endocrine disruptors) in this reissuance. This topic is still evolving at EPA.
- The TAC discussed whether to add a footnote to the limits table to clarify that effluent limits be reported as 2 significant digits. Most TAC members thought that the permittees will report whatever their lab reports and would not follow or understand this requirement. CO will check how this special condition is listed in individual permits. POST NOTE: Permit manual suggests the following special condition which is in the draft car wash permit: *The permittee shall report at least the same number of significant digits as the permit limit for a given parameter. Regardless of the rounding convention used (i.e., 5 always rounding up or to the nearest even number) by the permittee, the permittee shall use the convention consistently, and shall ensure that consulting laboratories employed by the permittee use the same convention.* Furthermore, the manual says that the *effluent limits should then be written as two significant digits except for BOD, bacteria and WET limits.* GM04-2020 states that BOD is only the exception if a single digit effluent is to be required. The TSS and BOD limit in the draft permit could be interpreted as one or two significant digits and this is handled inconsistently in the regions now. CO staff decided to follow the manual and guidance and add a footnote to the limits pages that TSS and BOD are two significant digits. We checked the regions and this issue is handled in different ways (a footnote is added that the values ending in zero are 2 significant digits, the special condition explains the trailing zeros are significant, all the limits are set up as 2 significant digits or nothing is said about the trailing zeros).