



COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

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SUBJECT: 1st Technical Advisory Committee (TAC) Meeting regarding 9
VAC 25-194 General Virginia Pollutant Discharge Elimination System (VPDES)
Permit for Car Wash Facilities

TO: TAC Members

FROM: George Cosby, Regulatory Affairs

DATE: March 24, 2011

A TAC meeting was held on March 23, 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, March 23, 2011
- The Regulation: 9VAC25-194, General VPDES Permit for Car Wash Facilities
- The NOIRA comment received from Jesse Maines of the City of Alexandria

Comments expressed at the meeting:

- Items that need to be incorporated in the amended GP, such as, the antidegradation policy, TMDL, and the continuation of permit coverage. Update the registration statement to conform with registration statements contained in recently issued GPs. Revised the registration statement submittal dates to DEQ. Add a line for the e-mail address to the registration statement. Identify the facility receiving surface waters in more detail in the registration statement. Inclusion of special conditions for compliance

reporting and discharges to meet water quality standards. Automatic transfers of permits were discussed and various problems that arise when owners change and the department is not notified.

- Will e registration be available for registrations for general permits? DEQ responded no.
- Consider referencing the need to use VLAP laboratories on the registration statement or instructions. Consider referencing the need to coordinate with the locality if discharging to an MS4.
- The TAC will weigh whether to increase the types of vehicles that can be covered by the GP. The TAC will also determine if the type of facilities covered can be increased to include charity car washes, mobile car washes, and laundries. The TAC discussed whether the type of vehicle mattered or whether the type of detergent that is used and/or type of cleaning method (like steam cleaning or power washing) were key factors in determining the type of pollutant control.
- The TAC will look at the feasibility of requiring facilities covered by this GP located near sewage connection be required to connect.
- The TAC suggested a minimum discharge coverage permit for discharges less than 500 gallons.
- The TAC requested that Mr. Schrum, industry representative, provide any data he may have on car wash soaps used or effluent data particularly for chlorides and phosphates. CO will check the EPA guidance document for effluent discharges from the auto and other laundries point source category and actual effluent data from when the general permit was first developed in 1997 to see if chlorides and phosphates were considered at that time.
- The TAC will have a first draft of the Regulation to review prior to the next meeting.

The TAC members agreed that the next meeting would be on April 20, 2011 at 1:00 pm at the same location. The meet-me conference telephone number for this meeting will be 804/698-4504.

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