

**COMMONWEALTH OF VIRGINIA
DEPARTMENT OF ENVIRONMENTAL QUALITY
DIVISION OF WATER QUALITY PROGRAMS
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Subject: Guidance Memorandum No. 06-2009
Review and Approval of Operation and Maintenance Manuals for
Municipal Sewage Treatment Works

To: Regional Directors

From: Ellen Gilinsky, Ph.D., Director



Date: July 5, 2006

Copies: Rick Weeks, Deputy Regional Directors, Regional Office Water Permit Managers,
Regional Office Water Inspection Staff, Office of Wastewater Engineering Area
Engineers, Kyle Winter, and William Purcell

Summary:

The purpose of this memo is to provide guidance on the procedure for review and approval of Operation and Maintenance (O&M) Manuals for municipal sewage treatment works.

Electronic Copy:

An electronic copy of this guidance in PDF format is available for staff internally on DEQNET, and for the general public on DEQ's website at: <http://www.deq.virginia.gov>.

Contact information:

Please contact Marcia Degen, Technical Program Manager for the Office of Wastewater Engineering at mjdegen@deq.virginia.gov if there are questions regarding this guidance.

Disclaimer:

This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any particular method for the analysis of data, establishment of a wasteload allocation, or establishment of a permit limit. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.

Municipal Sewage Treatment Works Operation and Maintenance Manual Review and Approval

Background

Submittal of an Operation and Maintenance (O&M) Manual is required by the *Sewage Collection and Treatment Regulations* as a condition of a Certificate to Construct (CTC) or a Certificate to Operate (CTO) and by the VPDES permit condition.

There are essentially three types of O&M submittals: (1) O&M manuals that are required by a CTC for a new treatment process/facility or a significant modification of an existing process/facility; (2) periodic O&M manual revisions/updates required by a VPDES permit condition; and (3) O&M manual changes that are requested as the result of an inspection. This memo outlines separate methods for the review and approval of these types of O&M submittals.

Procedures

(1) O&M manuals that are required by a CTC for a new treatment process or a significant modification of an existing process:

The Office of Wastewater Engineering (OWE) area engineers will be responsible for the final approval of manuals that fall into this category, but the review should be a joint effort between the Regional Office Water Permit (WP) staff and OWE. The WP staff and OWE should review the O&M Manual concurrently. As OWE is required to complete technical evaluations of the O&M Manual and other documents within 30 days of receipt of complete documents, WP staff should complete review and forward comments (email acceptable) to OWE within 21 days upon receipt of complete documents. WP staff should give particular attention to the lab, sampling, and permit related sections. In some regions, the inspection staff is involved in this review as well.

OWE should review the sections dealing with operation and maintenance of the sewage treatment works. The WP staff should forward comments to OWE, and based on the sections that they reviewed, the WP staff could recommend approval or disapproval of the manual to OWE. Should conflicts arise as a result of WP and OWE review, those issues should be resolved prior to final approval. OWE should send out the final approval letter to the permittee and provide a copy to WP. WP does not need to send a separate letter to the permittee. For VRLF projects, copies of all correspondence related to the review and approval of the O&M Manual should be provided to the DEQ regional construction assistance staff. As indicated in the VPDES permit special condition, the approved O&M Manual is an enforceable part of the permit.

(2) O&M manuals updates/revisions submitted in response to a VPDES permit condition:

Each VPDES permit has a requirement that the existing O&M manual be reviewed and updated during the current permit cycle. Many of these changes do not affect the technical description and operation of the facility, but do reflect new permit conditions, new contact information, etc. For manuals that fall into this category, the WP staff will be responsible for the review and processing the approval of the manual. Approval letters are to be drafted for

signature by the Regional Director or his designee. If the update does include technical changes, the WP staff may consult with OWE.

(3) O&M manual changes that are requested as the result of an inspection:

Should a revision to an existing O&M Manual be deemed necessary as a result of an inspection, the compliance staff should process the approval of the O&M change. The approval letter should be drafted for signature by the Regional Director or his designee.

Often these changes involve updating the manual to reflect current operations. If the inspection reveals a physical modification to the facility that should have had a Certificate to Construct issued, the OWE engineer should be consulted.

For all of the above cases, a copy of the O&M approval letter must accompany the latest version of the approved manual in the regional file.