

## Reissuance of the Cooling Water Discharges General Permit Regulation (9 VAC 25-196) - Minutes of the 1<sup>st</sup> Technical Advisory Committee (TAC) Meeting

A TAC meeting was held at 10 AM on March 21, 2007 at the DEQ Piedmont Regional Office in Glen Allen, Virginia. The TAC members attending the meeting were as follows:

Helen R. Cerra	ChemTreat, Inc.
Matt Cox	HRSD
Burt Tuxford	DEQ Central Office
James Olson	DEQ Northern Virginia Regional Office
Michelle Hollis	DEQ Tidewater Regional Office

Committee members absent were:

Chuck Frederickson	James River Association
Debbie Shows	Raytheon Company

Burt Tuxford opened the meeting and briefly discussed the purpose of the TAC. Next followed questions and discussion by the TAC:

- What is a discharge to "surface waters"? If a facility has a pipe that discharges to a ditch that goes about 5 feet, then into a storm sewer (or into a creek), is this a discharge to "surface waters"?

*Yes. Once it leaves the pipe, it becomes "surface waters". If they discharge directly to the storm sewer, it is still considered a discharge to surface waters. For a discharge to a dry ditch, the discharger has to meet any effluent limitations at the "end of pipe" (i.e., before it reaches the ditch.)*

- What do we do if there are water quality concerns from a facility with cooling water discharges? (One of the DEQ TAC members brought along DMR data from their facilities, which was shared with the entire TAC). If a facility is violating water quality standards consistently (and badly), how should this be handled?

*Need to visit/inspect the facility (probably with a DEQ inspector) to see what they are doing that is causing the water quality violations. Could be the chemicals they are using/improper dosing of chemicals or some other issue. Need to discuss with the facility possible solutions to the problem. If the problem continues, or there is no solution to the problem, then the facility needs to either: (1) connect to the sanitary sewer (if available); or, (2) get an individual VPDES permit and treat the discharges to meet the permit effluent limits.*

- We need to modify the Registration Statement under #6.d to have the facility provide an evaluation of the chemicals that they will be using. We need to have them provide a technical evaluation of the active ingredients.

*The committee agreed that this would be a good thing to require. Burt Tuxford will draft some language and share it with the entire committee for comment.*

- The regulation (and general permit) needs to better identify the limitations on the general permit coverage. It is not clear until you get to the limits page that only discharges less than or equal to 50,000 gpd may be covered under the permit. Also need to let everyone know that the permit is for non-contact cooling water discharges only.

*The committee agreed that this would be useful. Burt Tuxford will draft some language and share it with the entire committee for comment.*

- One comment was received during the NOIRA comment period from a lawyer representing a private residence permittee (the comment was shared with the TAC prior to the meeting). The permittee has a geo-thermal system, and is spending about \$1000 a year for monitoring and reporting. They are requesting that we modify the permit to either eliminate the monitoring altogether, or reduce the monitoring for residential systems such as his.

*The TAC agreed that some monitoring relief should be given to systems such as this. It was proposed that the regulation be modified to allow them to sample once during the 1<sup>st</sup> year of the permit, and if there were no problems reported, then they would be waived from monitoring for the remainder of the permit term. This would apply to any discharger using a geo-thermal system, using groundwater and no additives, only. Burt Tuxford will draft some language and share it with the entire committee for comment.*

- A suggestion was made to one of the TAC members that boiler blowdown may be reasonable to add to this permit since it is similar to many cooling water discharges. Should coverage for this be added to this permit?

*The TAC agreed that boiler blowdown should NOT be added to this permit. While boiler blowdown may be similar, it was felt that there was not a documented problem out there, or a need to add this to the cooling water permit at this time. If a need for a boiler blowdown general permit arises in the future, we could develop a separate permit for those discharges.*

The next TAC meeting is scheduled for April 11<sup>th</sup> at 10 AM at the Piedmont Regional Office.

The meeting adjourned at 11:15 AM.