

**Watershed General Permit for Nutrient Trading (9VAC25-820) – 2016 Reissuance**  
**3rd TAC Meeting**  
**July 1, 2015, 10:00 am**  
**DEQ Piedmont Regional Office**

## **Minutes**

### **Attendees**

Allan Brockenbrough, DEQ-CO  
Alison Thompson, DEQ-NRO  
Dawn Jeffries, DEQ-VRO  
Bill Purcell, VMA  
Jaime Mitchell, HRSD  
Rich Gullick, Rivanna WSA  
Jason Erickson, Dominion  
Chris Moore, Chesapeake Bay Foundation  
Patricia Gleason, EPA Region III  
Richard Street, Spotsylvania County  
Chris Tabor, Hazen & Sawyer  
Bud Campbell, Aqua Virginia  
Brenda Robinson, The Sustainability Park  
Fred Cunningham, DEQ-CO  
Emily Russell, VCN  
James Grandstaff, Henrico County  
Elleanore Daub, DEQ-CO  
Adrienne Kotula, James River Association

### **Discussion**

Allan Brockenbrough reviewed changes to the draft regulation made in response to comments received to date. Major subjects addressed included:

#### Sample Type and Collection Frequency

The previous 1.0 – 19.999 MGD flow range was split up into ranges of 1.0 – 4.999 MGD and 5.0 – 19.999 MGD flow ranges with the increased sampling requirements only applied to the 5.0 – 19.999 MGD category. Likewise, the previous 0.040 – 0.999 MGD flow range was split up into ranges of 0.040 – 0.4999 MGD and 0.5 0 0.999 MGD with the increased sampling requirements only applied to the 0.5 – 0.999 MGD category. There seemed to be general support for this modification.

#### Nitrogen Quantification Levels

The QL requirements were modified for Nitrate (0.20 mg/l) and Nitrite + Nitrate (0.20 mg/l). A provision was also added to allow for the case by case approval of higher QLs where the higher QL routinely results

in reportable results of the species in question or is otherwise technically appropriate based on standard lab procedures. Rich Gullick indicated that he did not like reporting values less than the QL as one half the QL or as a zero. He would prefer to report less than a specific number. There was some discussion of how either of those alternatives would impact reporting of total loading under the TMDL. James Grandstaff indicated some displeasure with lower QLs and Jaime Mitchell indicated that HRSD cannot go below a QL of 0.5 mg/l for TKN.

#### Nonpoint Source Trading Ratios < 2:1

A very minor change to the wording in Part II.B.1.b.(1).a adding “the effectiveness of” was discussed.

#### Other Items

Chris Pomeroy indicated that VAMWA was not entirely comfortable with the timing of the required TP reductions and may provide further comments on the reallocation numbers. There were no comments made by attendees that were not members of the TAC. The TAC members agreed to provide any comments on the latest draft by July 24 2015.