



Commonwealth of Virginia

VIRGINIA DEPARTMENT OF ENVIRONMENTAL QUALITY

www.deq.virginia.gov

Stefanie K. Taillon
Secretary of Natural and Historic Resources

Michael S. Rolband, PE, PWD, PWS Emeritus
Director

**Sewage Collection and Treatment (SCAT) Regulation, 9VAC25-790
SCAT Advisory Committee**

Meeting Minutes

August 27, 2025

The Virginia Department of Environmental Quality (DEQ) held the fourth Sewage Collection and Treatment (SCAT) Advisory Committee meeting on August 27, 2025, to review the regulation, 9VAC25-790, at the DEQ Piedmont Regional Office (PRO) located at 4949-A Cox Road, Glen Allen, Virginia 23060. The meeting began at 9:30 am and ended at approximately 2:30 pm. The committee met to discuss issues and standards in Part III, Article 7. The committee's purpose as stated in 9VAC25-790-250, subsection D, is to meet, discuss issues, and make recommendations to the director concerning policies, procedures, and programs for regulating sewerage systems and treatment works. The committee's meeting was advertised on Virginia Regulatory Town Hall website and open to the public.

SCAT committee members in attendance:

SCAT Advisory Committee Members		
Timothy Castillo, Virginia Rural Water Association (VRWA)	Rebecca Golden – VSPE (Black and Veatch)	Rob Mangrum, Mangrum Consulting (Ramboll)
Matthew Rembold, (VAMWA)	Glenn Pearson, Prince William County Service Authority (PWCSA)	Christopher Tabor, Virginia Water Environment Association (VWEA)
Christopher Wilson (Alternate), Hampton Roads Sanitation District		

The following members were not in attendance: Brian Orrock, Spotsylvania County Utilities

SCAT Advisory Committee Ex-Officio Members and Alternates	
Ex-Officio Member	Alternate
Erica Duncan, Manager, Office of VPDES Permits and Compliance, DEQ	Joseph Bryan, VPDES Permit Supervisor, Office of VPDES Permits, DEQ
Jeanne Puricelli, VPA Permit Writer, Office of Land Application Programs, DEQ	Laura Galli, Guidance & Regulation Coordinator, VPDES, Office of VPDES Permits, DEQ

DEQ Staff	
Deanna Austin, Clean Water Finance, DEQ	Kim Butler, Clean Water Finance, DEQ
Nelson Daniel, Policy Analyst, Division of Policy DEQ	Morgan Emanuel, Regulatory Analyst, Division of Policy, DEQ
Meghan Mayfield, Director, Clean Water Financing & Training Programs, DEQ	Nyibe Smith, Office of Water Compliance, DEQ
Bryant Thomas, Interim Water Director, DEQ	

Interested Public	
Kevin Parker, HRSD	Kara Moran, Suffolk Sales
Jordan Combs (Alternate) - VRWA	Jeffrey Stiff (Alternate) DCWA

Meeting Opening and Introductions:

DEQ staff opened the meeting with introductions, information on facilities for the meeting site at PRO, purpose and role of the committee, review of public participation guidelines, FOIA reminders, and helpful reminders for contributing to group discussions.

DEQ staff presented the agenda for the meeting, and reviewed the purpose, regulatory process, and role of the Advisory Committee. Committee members did not request any revisions to the meeting minutes from the December 10, 2024, meeting. The PowerPoint presentation staff used to facilitate discussion during the meeting follows the minutes.

Discussion Summary (DEQ):

- Overview of objectives for amendments to the SCAT Regulation, 9VAC25-790:
 - Establish minimum requirements for the construction and operation of facilities designed to collect and treat sewage wastewaters in Virginia.
 - Incorporate a set of policy, procedural, and planning statements.

- Include reference to the technical specifications and engineering design criteria or practices of one more generally accepted wastewater treatment reference documents and engineering manuals:
 - Members discussed what design manuals could be used as standard references in the regulation; members recommend referencing Manual of Practice (MOP) 8. MOPs are a public collective effort which results in a consensus document. Members recommended against the 10-State Standards as they are less comprehensive and not nutrient focused.
 - Committee members discussed including references to the Code of Federal Regulations.
 - Committee members recommended maintaining references to Occupational Safety and Health Administration (OSHA) standards.
 - DEQ staff noted that Documents Incorporated by Reference (DIBR) would need to cite a specific version (or date of publication) and could be updated as needed through regulatory processes.
 - Committee members discussed specific topics related to disinfection practices including peracetic acid as a disinfectant.
 - Committee members talked about the need to include ways to adopt and incorporate new technologies in the regulation and how that might relate to the current method which uses a design exception via Certificate to Construct (CTO)/Certificate to Operate (CTO).
 - Committee members thought that language regarding purpose/applicability and reliability/redundancy would need to be retained, however actual design language could be removed and addressed by reference. They also thought that language allowing DEQ to enforce which designs meet performance standards needs to be retained.
 - Committee members discussed whether 9VAC25-790-210 was the appropriate section in which to address new technologies.
 - DEQ staff and committee members noted that, due to program changes, DEQ no longer has design engineers who can conduct engineering reviews of plans. Instead, DEQ focuses on whether permit obligations are being met.
 - Committee members recommended adding language to document how new technology will meet reliability and redundancy requirements of conventional technologies in use.
 - Committee members discussed the possibility of having nonconventional technologies revert to conventional if the nonconventional technology fails to meet permit limits.
- Base regulatory requirements on operating parameters, life expectancy, redundancies, volumes, dimensions, baseline minimums and maximums.
- DEQ staff talked about using technical guidance, rather than regulations, to address any specific program or design considerations or requirements which are unique to Virginia. Issue-specific technical guidance would supplement the generally accepted design criteria or practices.

- Additional objectives:
 - Regulatory Necessity:
 - Protect human health and the environment.
 - Prevent permit noncompliance resulting in possible violations of water quality standards and costly enforcement actions.
 - Reduce the regulatory burden: Are there less burdensome and less intrusive alternatives to achieve the regulation's essential purpose?
 - Clarify language for individuals affected.
 - Keep technology standards up to date.

Discussion Summary: (Committee Open Discussion)

Committee members discussed approaches to reviewing, revising and reformatting the SCAT Regulation. DEQ staff noted that Part I of the regulation is generally focused on internal policies and procedures and can be revised by DEQ staff.

The Committee focused its discussion on Part III, Article 7, Effluent Polishing and Disinfection Processes. Committee members reviewed notes and regulatory language DEQ staff developed for purposes of discussion with the Committee.

- 9VAC25-790-740 Disinfection
 - Discussed removal of redundant, obsolete, or outdated language in the current regulation.
 - Discussed the need to include specific reference to VPDES permits.
 - Recommended deleting proposed subsections B.1-4
 - Recommended deleting language requiring de-chlorination, alternate disinfection methods, or alternate methods of reducing toxicity.
 - Discussed using proposed language from subsection D as redundancy and reliability for disinfection.
 - Discussed UV disinfection for E. coli.
 - Proposed renaming proposed subsection D.3 as "Primary Disinfection."
 - Proposed deleting proposed language from subsection D.3.A.
 - Discussed allowing permittees to have case-by-case review of membrane providing pathogen removal.
 - Discussed effect of particle removal as a standard.
 - Discussed moving filtration language to 9VAC25-790-210, as filtration is not currently considered "conventional."
 - Discussed maintaining disinfection and reliability in case of loss of one source of power.
 - Discussed including redundancy requirements for hydraulic standards.
 - Discussed max daily flow vs peak hourly flow.
- 9VAC25-790-750 Chlorination
 - Discussed removing language stating that design must identify the selected type of chlorine.
 - Proposed adding language requiring on-site storage.

- Discussed removing Minimum Design Chlorine Dosages (Table 7) and incorporating by reference, possibly through MOP 8.
- Discussed whether automatic transfer was mandatory or prescriptive language.
- Discussed incorporating chlorine gas into O&M design, as well as moving language to gas section.
- Discussed moving language related to equipment for measuring chlorine to gas section, as this does not need to be in general chlorination section. Committee members recommended considering incorporating by reference.
- Discussed incorporating redundancy language for operating chlorinators.
- Discussed minimum contact period of 20 minutes at max daily flow.
- Discussed incorporating chlorine tank design specifications by reference and deleting section.
- Discussed moving redundancy gas chlorinator language to subsection E.3
- Discussed simplifying definitions throughout the regulation.
- Discussed adding “redundant” when listing which equipment must be equipped to emergency power systems.

Summary and Closing:

- DEQ staff concluded the meeting by discussing how to proceed with reviewing the regulation in the most efficient and effective manner, and what resources are available.
- DEQ staff reviewed Action Items moving forward (see below.)
- DEQ staff invited any interested members of the public to comment
- The meeting ended at approximately 2:30 p.m.

Public Comment:

- None

Action Items:

- DEQ will review relevant VPDES regulations to determine which make reference to SCAT regulations.
- DEQ will work to obtain a finalized list of applicable Manuals of Practice.
- DEQ staff will meet with management to determine what options are available to contract out the following:
 - Review design manuals and compare against existing SCAT Regs (Part III Manual of Practice), and
 - Draft revised language to be reviewed by DEQ and shared with the Advisory Committee
- DEQ staff will review procedural and policy sections (Parts I and II) to determine what revisions and updates are needed.

Next Meeting:

A Doodle Poll will be sent out by DEQ staff in the near future to set the time and date for the fifth Advisory Committee meeting.



Virginia Pollutant Discharge Elimination System (VPDES) 9VAC25-790 Review

Sewage Collection and Treatment (SCAT) Advisory Committee – Meeting No. 4

Erica Duncan

Office of VPDES Permits and Compliance Manager

Virginia Department of Environmental Quality

August 27, 2025

Meeting Agenda

- Introductions
- Purpose, role of the committee
- Review meeting minutes
- https://townhall.virginia.gov/L/GetFile.cfm?File=meeting\103\40958\Minutes_DEQ_40958_v1.pdf
- Review (9VAC25-790)
 - How to review moving forward
- Open discussion
- Next steps



Review Meeting Minutes



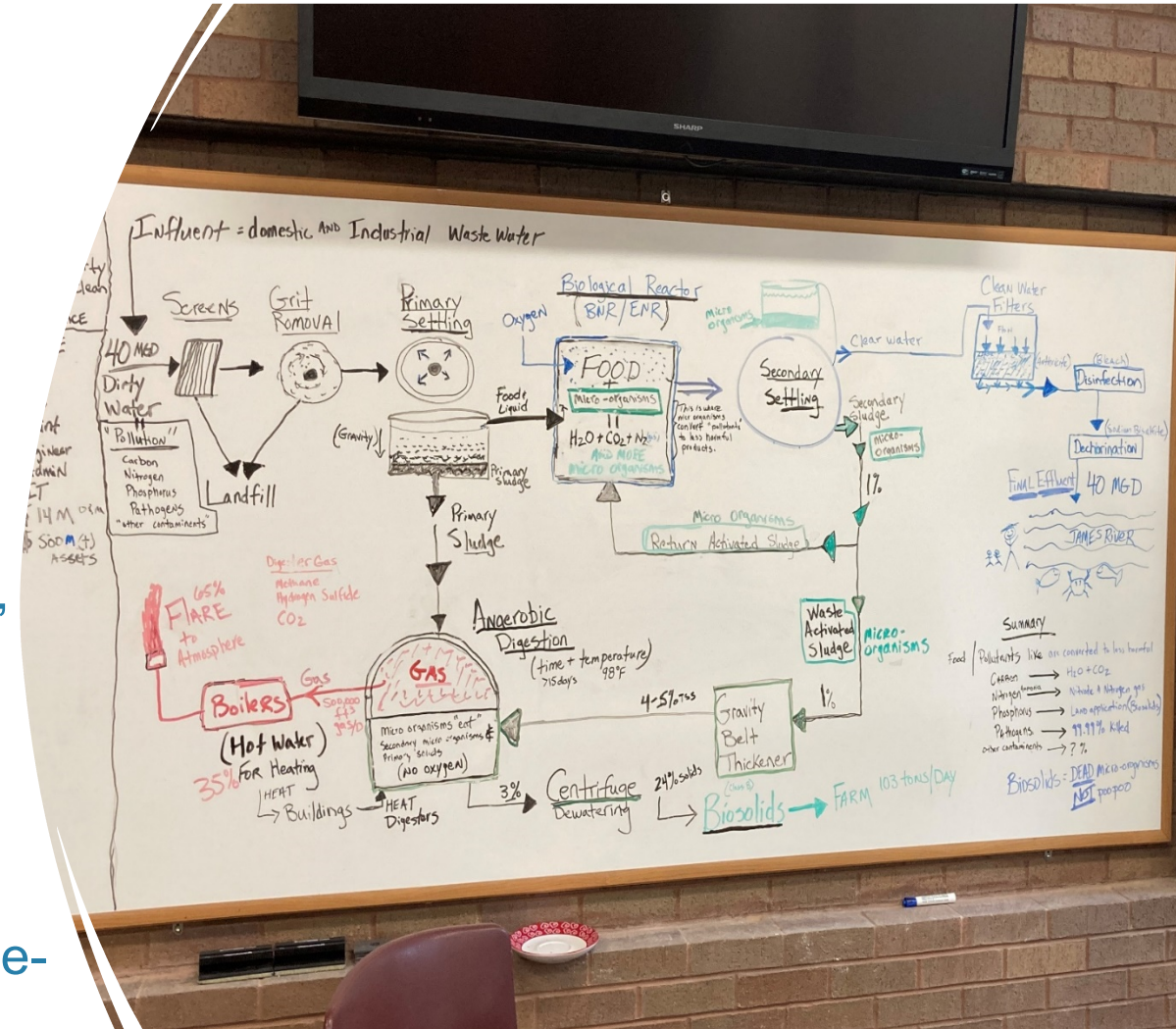
Purpose, Regulatory Process, and Role of Committee

- 9VAC25-790-250 allows the Director to appoint members to this advisory committee to:
 - Assist DEQ in developing proposed SCAT regulation amendments
 - Discuss issues and make recommendations for regulating sewerage systems and treatment works
- DEQ will consider Advisory Committee's recommendations and present the proposed regulation to the Board
- Appointed for a term of four years, for no more than two consecutive terms
 - Four of the eight appointed members serve initial two-year term with a subsequent four-year term



Overview of SCAT Regulation Review

- Establishes minimum requirements for the construction and operation of facilities designed to collect and treat sewage wastewaters in Virginia
- Incorporate a set of policy, procedural, and planning statements
- Include reference to the technical specifications and engineering design criteria or practices of one more generally accepted wastewater treatment reference documents or engineering design manuals.
- Committee can base input on operating parameters, life expectancy, redundancies, volume, dimensions, baseline minimums and maximums
- DEQ recommends that any specific program or design considerations or requirements which are unique to Virginia be addressed through technical guidance, rather than established in regulation. Issue-specific technical guidance can supplement the generally accepted design criteria or practices.



Known Revisions

- Regulatory necessity:
 - Protect human health and the environment
 - Prevent permit noncompliance resulting in possible violations of water quality standards and costly enforcement actions
- Regulatory burden: Are there less burdensome and less intrusive alternatives to achieve the regulation's essential purpose?
- Clarify language for individuals affected
- Keep technology standards up to date



Advisory Committee Open Discussion

- <https://law.lis.virginia.gov/admincodefull/title9/agency25/chapter790/>
- Issues concerns or questions
- Ideas for potential improvements

Advisory Committee Open Discussion



Next Steps

- Future meeting – schedule & agenda
- Meeting minutes published on Town Hall





Erica Duncan

Manager, Office of VPDES Permits and Compliance

[Virginia Department of Environmental Quality](#)

1111 East Main Street, Suite 1400

Richmond, Virginia 23219

(804) 337-5407

Questions?