

Richmond Meeting Agenda

Permit 3-1173

September 28th at 3:00

Introduction

Permit Background:

- Permit effective date: October 1, 2005
- Permit expiration date: September 30, 2010
- Title 3 Section 814 issued on March 30, 2010

TMDL Overview

LC TMDL driven limits:

- Current phosphorous limits: 405 lbs. annual limit and 0.8 mg/L monthly average
- Draft permit phosphorous limits: 134 lbs. annual limit and 0.8 mg/L monthly average

Phosphorous Optimization Plan (POP)

- Details alternative methods of operating the existing WWTF.
- Due within 120 days of the permit issuance date.
- Implement POP within 60 days after submittal to the Secretary.
- Submit an Annual Report beginning in 2021 (attach to December 2021 DMR).
- 12 months to optimize total phosphorous removal.
- If the facility's total phosphorous loads reach or exceed 80% of the LC TMDL (based on 12-month running annual load), the facility will need to develop and submit a Phosphorous Elimination/Reduction Plan (PERP) that evaluates alternatives and includes a proposed schedule and financing plan for implementing the PERP.

Other New Draft Permit Requirements:

- "Monitor only" Total Nitrogen (TN), Total Kjeldahl Nitrogen (TKN), and Nitrate/Nitrite (NO_x) at a frequency of 1 × quarter.
- "Monitor only" total gallons of septage received at a frequency of 1 × month.
- Whole Effluent Toxicity (WET) Tests:
 - 2-species (Pimephales promelas and Ceriodaphnia dubia) acute tests during August-October 2022. Submit results by December 31, 2022.
 - 2-species (Pimephales promelas and Ceriodaphnia dubia) acute tests during January-February 2024. Submit results by June 30, 2024.

- Non-Compliance Notification (Condition II.D.3.)- Public notice online within 1 hour, Secretary notification online within 12 hours; replaces current permit requirements for public notification for E. coli violations (≥ 235 colonies/100 ml).
- Annual proficiency tests for parameters analyzed at the WWTF lab are due by December 31st each year. The first proficiency test results are due by December 31, 2021.

Other Draft Permit Due Dates:

- Engineering Evaluation- Last engineer evaluation was conducted by Hoyle, Tanner & Associates and submitted on April 28, 2005. Engineering evaluation due by December 31, 2024.
- Annual Constituent Monitoring for Total Ammonia Nitrogen (TAN), dissolved oxygen, oil and grease, total dissolved solids, and temperature due annually starting in 4th quarter 2020 (scheduled to complete).
- Emergency Power Failure Plan – revised plan due within 90 days after the issuance of the permit.
- Operation, Management, and Emergency Response Plan (OMERP)- submitted in September 2020- not due during upcoming permit term.

Timing for draft permit to go on public notice: TBD- September-October 2020

Timing to issue final discharge permit: TBD- November 1, 2020 effective date

Discussion of Questions and Concerns