

From: [Bethany_Georgoulas <Bethany.Georgoulas@ncmail.net>](mailto:Bethany.Georgoulas@ncmail.net)

To: [Bradley_Bennett <Bradley.Bennett@ncmail.net>](mailto:Bradley.Bennett@ncmail.net)
[Jennifer_Jones <Jennifer.Jones@ncmail.net>](mailto:Jennifer.Jones@ncmail.net)
[Cory_Larsen <Cory.Larsen@ncmail.net>](mailto:Cory.Larsen@ncmail.net)
brian.lowther@ncmail.net
[Robert_Patterson <robert.patterson@ncmail.net>](mailto:robert.patterson@ncmail.net)
[Ken_Pickle <ken.pickle@ncmail.net>](mailto:ken.pickle@ncmail.net)

Date: 4/1/2009 3:56:22 PM

Subject: [Fwd: _Re:_[stormwater]_Power_Plants_and_Stormwater_Monitoring]

FYI - I wanted to hear more from Missouri.

----- Original Message -----

Subject: Re: [stormwater] Power Plants and Stormwater Monitoring

Date: Wed, 01 Apr 2009 15:55:24 -0400

From: Bethany Georgoulas

To: Michael Abbott

References:

Michael,

Thanks so much for the response. This is really interesting information for us. We also use benchmarks here in North Carolina in our stormwater permits, and primarily those are based on acute effects as well; however, we rarely employ limits on stormwater discharges (unless some kind of stormwater effluent guideline applies, and even then, we have more or less viewed that as a wastewater). You mentioned the 'Independent Application' method and referred to TSD 3.1.3 -- I don't know what that resource is? I'm familiar with Reasonable Potential analysis (I used to write wastewater permits here in NC several years back), but we have not employed anything that mirrors that in the stormwater program here before because of concerns in setting variables like receiving stream flow during rain events, flow discharge, etc. We are only now collecting enough stormwater discharge data from industries through their permit cycles to think about a meaningful statistical analysis. We would be interested in hearing more about how you apply the Independent Application as a method of determination.

Regards,
Bethany Georgoulas

Michael Abbott wrote:

>

> Bethany:

> This is a big area for Missouri's NPDES program that I could discuss

> for a couple of days, but I am going to keep it short. If you have

> any questions or comments, please feel free to contact me regarding

> this email.

>
> At this time, Missouri has not fully accepted the method of applying
> best management practices (bmps) with a Storm Water Pollution
> Prevention Plan (SWPPP) as a means of "technology-based" effluent
> limitations as recommended by EPA Region VII. We still approach the
> matter via case-by-base (i.e., WQBEL) for all industry with storm
> water run-off. We use the methodology of "Independent Application"
> (TSD 3.1.3 Page 49) to determine compliance with Missouri's Water
> Quality Standard for any discharge (especially storm water run-off).
> Independent Application is a form of Reasonable Potential Analysis
> but more of a determination.
>
> Therefore, if an industry could have metals (or other pollutant
> parameters) as a monitoring requirement if they show that their
> effluent has the pollutant parameter in it. They could also receive
> effluent limits for the metal if they are discharging the specific
> pollutant at or above Missouri's Water Quality Criteria (appropriate
> criteria). In Missouri, rather than establishing or using chronic
> criteria for example Lead, we would use the acute criteria. This is
> due to the fact that most storm events in Missouri do not last over 4
> days (continuous); thus we use acute criteria. If the pollutant does
> not have acute criteria, then we can use the chronic criteria or other
> appropriate standards based on the receiving streams designated uses.
>
> Other considerations that we take into account are: what is observed
> during site-visits, what is exposed to the elements, stream
> conditions, narrative criteria, etc...
>
> Now regardless if the industry has WQBEL, we still require that they
> develop a SWPPP, which may subsequently require BMPs.
>
> Above I did mention "fully". We have some General permits that
> utilize BMPs and SWPPP as a form of TBEL. However, we also establish
> "Benchmarks" for these facilities. Benchmarks are self monitoring
> results (kept by the permittee) to determine if their BMPs are
> working. If the BMPs are not working, then they are required to
> "construct, upgrade, or repair" BMPs. If they fail to do so and the
> department determines that they are in violation of the operating
> permit, the department will require the permittee to obtain a
> site-specific permit. After a return to compliance and several
> seasons of data collection, they can return to a General Permit status.
>
>
> Respectfully,
> Michael Abbott, Environmental Specialist III
> Water Protection Program, NPDES Permits & Engineering
> Department of Natural Resources
> (573) 526-1139
> (573) 522-9920 (fax)
> ----- Forwarded by Michael Abbott/WPCP/DEQ/MODNR on 03/31/2009 07:49
> AM -----
> From: Ruth Wallace/WPCP/DEQ/MODNR

> To: Michael Abbott/WPCP/DEQ/MODNR@MODNR
> Date: 03/30/2009 03:58 PM
> Subject: Fw: [stormwater] Power Plants and Stormwater Monitoring
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> -----
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>
> thought you might be able to answer this???

>
> Ruth A. Wallace
> Municipal Storm Water Program Coordinator
> Water Pollution Control Branch
> (573) 522-1131
>
> Missouri Storm Water Information Clearinghouse
> <http://www.dnr.mo.gov/env/wpp/stormwater>
>
> ----- Forwarded by Ruth Wallace/WPCP/DEQ/MODNR on 03/30/2009 03:58 PM
> -----

> From: "Bethany Georgoulis"
> To: STORMWATER
> Date: 03/30/2009 03:55 PM
> Subject: [stormwater] Power Plants and Stormwater Monitoring
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> Hi all,
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> We are renewing several power plant stormwater permits here in North
> Carolina and are wondering what other states are requiring as far as
> monitoring. We are interested in hearing whether other states have
> initiated stormwater monitoring for metals and/or other constituents
> besides TSS and pH (limited for coal pile runoff but not other
> stormwater discharges) at these facilities, and if so, which parameters
> have been targeted. Also, do any states have data on stormwater
> discharges from steam electric generating facilities that include heavy
> metals, or done any work to characterize those discharges?
>
> Thanks for any insight!
>
> --

> Bethany Georgoulis
> Environmental Engineer
> NCDENR | DWQ | Stormwater Permitting Unit
> 1617 Mail Service Center, Raleigh, NC 27699-1617
> 512 N. Salisbury St, Raleigh, NC 27604
>
> Phone: (919) 807-6372

> Fax: (919) 807-6494
> Website: <http://h2o.enr.state.nc.us/su>
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> -----
> You are currently subscribed to stormwater as: ruth.wallace@dnr.mo.gov
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Bethany Georgoulis
Environmental Engineer
NCDENR | DWQ | Stormwater Permitting Unit
1617 Mail Service Center, Raleigh, NC 27699-1617
512 N. Salisbury St, Raleigh, NC 27604

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Fax: (919) 807-6494
Website: <http://h2o.enr.state.nc.us/su>

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Bethany Georgoulis
Environmental Engineer
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512 N. Salisbury St, Raleigh, NC 27604

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