STATE OF WEST VIRGINIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DIVISION OF WATER & WASTE MANAGEMENT
601 57th Street SE
Charleston, WV 25304-2345

FACT SHEET, INFORMATION, AND RATIONALE FOR WV/NPDES GENERAL PERMIT FOR HYDROSTATIC TESTING WATERS IN WEST VIRGINIA

1. NAME AND ADDRESS OF APPLICANT

Any establishment with discharges composed entirely of hydrostatic test water from the testing of newly constructed, or cleaned and certified PCB-free, pipeline and/or storage tanks agreeing to be regulated under the terms of this proposed General Permit.

2. GENERAL WV/NPDES PERMIT NO.: WV0113069

3. COUNTY: Any WV County RECEIVING STREAM: Any WV stream

4. PUBLIC COMMENT PERIOD: November 16, 2011 – December 16, 2011

5. SIC CODES Primarily 4922 – Natural Gas Transmission. Others could be applicable.

6. DESCRIPTION OF APPLICANT'S FACILITY OR ACTIVITY:

The main activity is primarily transmission and/or distribution of natural gas. Other activities including crude or refined oil transmission and distribution may also be eligible for coverage.

7. DESCRIPTION OF DISCHARGES:

Discharges covered under this General Permit will primarily be from the hydrostatic testing of newly constructed, or cleaned and certified PCB-free, pipeline and/or storage tanks. When a new pipeline is constructed or a section of existing pipeline is replaced, it is necessary to pressure test the pipeline to insure safe operation. Typically, this is accomplished by filling the pipeline with water and applying pressure. The pressure is monitored over a period of time, then the water is discharged. Normally the source water for the testing is the receiving stream or other waters of the State. In some instances, it is necessary to use a potable water supply as source water. Special restrictions have been included in this General Permit to cover this event. Since this general permit covers only waters from hydrostatic testing of newly constructed, or cleaned and certified PCB-free, pipeline and/or storage tanks, the source water should not be chemically or physically altered prior to discharge. Also, special requirements are included in this General Permit specifying the need for an approved Sediment and Erosion Control Plan to prevent excessive erosion and siltation in the receiving stream.

8. COVERAGE UNDER THE GENERAL PERMIT

This General Permit proposes to provide coverage for any establishment with discharges composed entirely of waters from hydrostatic testing of newly constructed, or cleaned and

certified PCB-free, pipeline and/or storage tanks and agreeing to be regulated under the terms of the General Permit.

Projects proposing the hydrostatic testing of pipeline that will convey chemicals other than crude oil, refined oil, or natural gas will be evaluated on a case-by-case basis for coverage under this general permit.

For the purpose of this General Permit, the term establishment shall be construed to mean certain pipeline replacement and/or construction projects electing to be regulated by said permit.

9. PROPOSED EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS:

All projects covered by this general permit will be required to sample, analyze and submit Discharge Monitoring Reports (DMRs) for the designated parameters once per discharge.

10. WHEN TO APPLY

State NPDES rules require permit applications to be filed at least 180 days prior to the commencement of the activity. The Agency is attempting, through this General Permit process, to streamline the permitting of this particular activity. Therefore, projects which may potentially obtain coverage under this General Permit and which submit complete site registration application forms, shall make that submission at least sixty (60) days prior to the anticipated date of discharge.

11. SECTION BY SECTION RATIONALE

Section A. This portion of the permit establishes the discharge limitations and the monitoring requirements for permittees.

The following three (3) parameters have been identified as baseline parameters that generally form the foundation for the different monitoring requirements in the permit:

A. **Oil and Grease** is a common industrial pollutant and can readily be expected to be associated with the discharge. This is expected due to the fact that new pipeline is coated with a light mineral oil to prevent corrosion prior to use. Through conversation with another State's permitting agency it was learned that the levels of oil and grease associated with these discharges have not been excessive and have not caused problems. Most of the data shows non-detectable levels of oil and grease with some discharges containing up to 3 - 5 mg/l oil and grease. Also, through discussions with field personnel, it was determined that the discharges have not been causing any problems in the State as well. Therefore, it is proposed to require only monitoring for oil and grease.

B. Total Suspended Solids (TSS) is a common pollutant found in surface waters that reflects sediment disturbances in the withdrawal of source waters. It is expected that the majority of the TSS levels associated with these discharges can be attributed to the stream characteristics. Therefore, monitoring only is proposed for TSS.

C. **pH** limitations are proposed to prevent source waters of low pH being discharged to receiving streams of high pH (or vice versa). The proposed limit of 6.0 to 9.0 s. u. is in accordance with the Water Quality Standards of Title 47, Series 2 of the West Virginia Legislative Rules (WVLR). This restriction is necessary due to the fact that some hydrostatic tests involve different source and receiving streams. Also, in the event that a public potable water supply is utilized as source water, the pH limitation will assure that water quality violations do not occur.

Section A.1. – Projects utilizing water of the State as source waters.

No additional effluent limitations or monitoring requirements are proposed beyond the baseline parameters.

Section A.2. – Projects utilizing chlorinated potable water supply as source water with discharge to trout waters.

In addition to the baseline parameters, it is proposed to prohibit chlorinated discharges in accordance with the Water Quality Standards of Title 47, Series 2 of the WVLR.

The sampling location requirement specifies two (2) methods readily available for chlorine removal. The permittee may elect to use a dechlorination unit or, if space allows, may elect to construct a temporary holding pond to allow for chlorine dissipation. Either method is deemed satisfactory, provided that complete removal of chlorine is achieved.

Section A.3. – Projects utilizing chlorinated potable water supply as source water with discharges to warm water fisheries.

In addition to the baseline parameters, it is proposed to limit the discharge of total residual chlorine to 11 ug/l in accordance with the Water Quality Standards of Title 47, Series 2 of the WVLR.

Section A.4. – Projects utilizing chlorinated potable water supply as source water with discharges to Public 'A' waters.

In addition to the baseline parameters, it is proposed to limit the discharge of chloroform to 5.7 ug/l in accordance with the Water Quality Standards of Title 47, Series 2 of the WVLR.

Section B. – Other Requirements

This section encompasses the requirements specific to hydrostatic testing discharges and those projects subject to regulation under the General Permit.

Section B.1. This paragraph defines, for the purposes of this General Permit, what constitutes and individual outlet. It also details the provision for representative outlet designation.

Section B.2. This paragraph defines the sample collection requirements. It is proposed to require multi-grab samples for TSS and chloroform because they will provide representative data of the entire discharge. It is also proposed to require one (1) individually analyzed sample for oil and grease. A grab sample taken in the first 15 minutes of discharge should provide the necessary data. Multi-grab composites would not provide representative data for this parameter because some of the pollutants would remain in the containers used to collect the individual grabs.

Section B.3. This paragraph requires adequate advance notice of discharge to the appropriate field inspector so they may be present at discharge to ensure that Sediment and Erosion Control measures are properly used.

Section B.4. This paragraph establishes the Sediment and Erosion Control Plan as an enforceable part of the permit. This will help ensure that the proposed measures are in fact used thereby helping to prevent degradation to the receiving stream

Section B.5. Self-explanatory.

Section B.6. This paragraph requires the permittee to notify the DWWM of the completion of testing and provides for termination of permit coverage.

Section B.7. This paragraph delineates the requirements for discharge to a stream for which a TMDL has been developed.

Section B.8. Self-explanatory.

Section B.9. This paragraph provides notification that coverage under a general permit may be required and delineates how that will transpire.

Section B.10. Self-explanatory.

Section B.11. This paragraph contains the standard reopener clause for development of effluent limitations under the Clean Water Act subsequent to reissuance of the general permit

Section B.12. This paragraph delineates the requirements for TRC sampling and analysis.

The State of West Virginia, Department of Environmental Protection, Division of Water and Waste Management, has made a tentative decision for a State NPDES Permit as listed on this Fact Sheet. In order to provide public participation on the proposed issuance of the required permit, the following information is being supplied in accordance with Title 47, Series 10, Section 11.3.e.2 and 3, of the West Virginia Legislative Rules.

Any interested persons may submit written comments on the Draft Permit and may request a public hearing by addressing such to the Director of the DWWM within 30 days of the date of the public notice. Comments will be accepted until December 16, 2011. They should be addressed to:

Director, Division of Water and Waste Management
Department of Environmental Protection
601 57th Street, SE
Charleston, WV 25304
Attention: Helen Ford
Phone: (304) 926-0499, Extension 1065
Fax: (304) 926-0496
E-mail: helen.a.ford@wv.gov

All comments received within this period will be considered prior to acting on the Draft General Permit. Correspondence should include the name, address and telephone number of the writer and a concise statement of the nature of the issues being raised.

All applicable information concerning any permit application and the tentative decisions is on file and may be inspected, by appointment, or copies obtained, at a nominal cost, at the offices of the Division of Water and Waste Management, 601 57th Street, SE, Charleston, West Virginia 25304, Monday through Friday (except State holidays) between 8:00 a.m. to 4:00 p.m.

Requests for additional information should be directed to Helen Ford at (304) 926-0499, Extension 1065.