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TOWN OF BLACKSTONE

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ATTORNEY

NICHOLAS C. KUZMIAK
CHIEF OF POLICE

RECEIVED
AUG 25 2008
DEQ SCRO

August 20, 2008

Mrs. Leah R. Revelle
Environmental Engineer
Department of Environmental Quality
South Central Regional Office
7705 Timberlake Road
Lynchburg, Virginia 24502

	Date	Initials
Received in CEDS	~~[illegible]~~ NA	
To Permit Writer	8-25-08	
Reviewed & entered in CEDS	8-29-08	LRR
Complete date entered in CEDS	N/A	LRR
Forwarded for filing		
Filed		

Re: VPDES Permit No. VA0005827 Permit Reissuance, Town of Blackstone

* Application complete on 9/4/08.

Dear Mrs. Revelle:

Please find enclosed the completed permit reissuance package for the above named permitted outfall. The package includes completed forms for EPA Form 3510-1, EPA Form 3510-2C, Virginia DEQ No Exposure Certification for Exclusion from VPDES Storm Water Permitting, VPDES Permit Addendum, maps and supporting documentation.

It is our understanding from your correspondence of May 5, 2008, that there is no fee required for the reissuance of this permit.

Please note the following concerning the enclosed information:

- Where annual information was required, the term was from May 2007 through April 2008. There have been no discharges after the April 2008 ending date for data.
- Some required sampling and analysis was performed on lagoon contents rather than a lagoon discharge. As you know, we normally only have discharges under limited or emergency conditions. We did not create an intentional discharge in order to collect a sample. We did in fact fill the lagoon through normal operations and collected the samples just prior to a possible discharge.
- Most all water volumes are pumped to the Towns WWTP for treatment.
- All sludge volumes are treated at the WWTP.
- It is important to point out that during the permit reissuance process four years ago, the TSS sampling requirement concerning frequency of analysis was modified due to the limited and infrequent discharges. Although, TSS is not excessive by any means, the collection of TSS samples 3G/30 minutes produces higher TSS results than would be normally found due to the accumulation of solids in the discharge pipe and channel. If

the sampling frequency were more representative of the duration of the discharge, the TSS results would be significantly less. Historical data prior to the frequency change in 2004 displays this clearly.

- Copper and Zinc data is analyzed based on dissolved data versus total recoverable. Our permit requires dissolved sampling and analysis for these parameters.
- We request that the permit requirement for copper and zinc analysis be removed from the permit. Historical data shows that that there are no excessive amounts of either of these substances greater than what may be found in source water. That coupled with the majority of all flows being treated at the Towns WWTP indicates that this costly analysis should be excluded. The copper monitoring was added to determine if the addition of copper sulfate seasonally at our source water reservoir generated concerns of increased copper. The zinc monitoring was added due to the occasional addition of zinc orthophosphates for corrosion control in water distribution lines. Neither of these treatments appears to contribute to excess levels of copper or zinc.
- We request that the permit requirement for annual analysis of monitoring wells be limited to once per permit term.

If there are any questions concerning this reapplication, please feel free to call.

Sincerely,

J. Larry Palmore
Town Manager

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY

SOUTH CENTRAL REGIONAL OFFICE

7705 Timberlake Road, Lynchburg, Virginia 24502

(434) 582-5120 Fax (434) 582-5125

www.deq.virginia.gov

L. Preston Bryant, Jr.
Secretary of Natural Resources

David K. Paylor
Director

Thomas L. Henderson
Regional Director

May 5, 2008

Mr. Ron Silverman
Director of Water and Waste Utilities
Town of Blackstone WTP
100 West Elm Street
Blackstone, VA 23824

Re: VPDES Permit No. VA0005827 Reissuance Reminder Letter
Town of Blackstone WTP; Nottoway County, Virginia

Dear Mr. Silverman:

This letter is to remind you that the subject VPDES permit will expire on **May 4, 2009**. If you wish to continue discharging you must reapply for the permit. The State Water Control Board's VPDES Permit Regulation requires that we receive a complete application at least 180 days before the existing permit expires. **The deadline for submitting the application is November 5, 2008.** Early submissions are welcome and will better enable us to complete processing before permit expiration. The instructions and application forms are enclosed. If you would like to request a waiver from any of the sampling or testing requirements in the application forms, you must submit your application and a thorough justification for the request at least 240 days prior to the existing permit's expiration date. These waiver requests must be approved by DEQ and the U.S. EPA at least 180 days before the existing permit expires. DEQ will review your waiver request, and if justified, forward it to EPA. Failure to submit the waiver request by the 240 day deadline will result in the waiver request being denied.

Upon completing the applications, **return the original and three copies** to the South Central Regional Office at the above address. Based on legislative changes passed by the General Assembly in 2004 that affected the fee structure for the environmental permit, there is no application fee associated with the reissuance of this permit. Please feel free to give me a call at (434) 582-6219 or email me at lrevelle@deq.virginia.gov should you have any questions concerning the above.

Sincerely,

Leah R. Revelle
Environmental Engineer

Enclosures: EPA Form 1, EPA Form 2C, EPA Form 2F, VPDES Permit Addendum, Permit Fee Form, Pollution Prevention Flyer & Paperwork Reduction Act Notice

cc: SCRO Permit Processing File (VA0005827)