APPENDIX H

PUBLIC COMMENT CORRESPONDENCE

Pepper's Ferry Regional Wastewater Treatment Authority (PFRWTA) Comment Letter - July 8, 2014
PFRWTA Follow-up E-Mail – July 9, 2014
DEQ Response Letter – July 17, 2014
PFRWTA Request for Public Hearing – July 18, 2014
DEQ Response Letter – August 14, 2014
PFRWTA Public Hearing Request Withdrawal – August 19, 2014

Pepper's Ferry Regional Wastewater Treatment Authority
P. O. Box 2950 • Radford, VA 24143-2950

July 8, 2014

Hand Delivered

Mr. Robert J. Weld
Director, BRRO
DEQ - Blue Ridge Regional Office - Roanoke
3019 Peters Creek Road
Roanoke, VA 24109

RECEIVED
JUL 8 2014
DEQ - BRRO

Re: Pepper's Ferry RWTA – VPDES Permit No. VA0062685;
Draft VPDES Permit Reissuance - Comments

Dear Mr. Weld:

The Pepper's Ferry Regional Wastewater Treatment Authority (the "Authority") is in receipt of the draft permit (VPDES Permit No. VA0062685) proposed for reissuance to the Authority by the Virginia Department of Environmental Quality (the "DEQ"). The Authority appreciates the effort put forth by DEQ staff in the development of the draft permit proposed for reissuance; however, the Authority has significant concerns with the proposed permit as it currently drafted.

Attached please find the Authority's comments and concerns related to reissuance of the permit as currently drafted. I look forward to the opportunity of meeting with DEQ staff to discuss our comments and concerns prior to finalization and reissuance of the permit. Should you have any questions, please contact me at your convenience.

Sincerely,

R. Clarke Wallcraft

R. Clarke Wallcraft
Executive Director

Attachments

Cc: Correspondence File
Perm File

Area Code (540) 639-3947 • Fax (540) 633-0215

Pepper's Ferry Regional Wastewater Treatment Authority
P. O. Box 2950 - Radford, VA 24143-2950
Phone: 540-639-3947 Fax: 540-633-0215

PEPPER'S FERRY REGIONAL WASTEWATER TREATMENT AUTHORITY COMMENTS ON DRAFT PERMIT PROPOSED FOR REISSUANCE VPDES PERMIT NO. VA0062685

JULY 8, 2014

1. PART I B.11 – PCB MONITORING FOR TOTAL MAXIMUM DAILY LOAD (TMDL) DEVELOPMENT

The Pepper's Ferry Regional Wastewater Treatment Authority (the "Authority") strongly opposes PCB sampling requirements being extended into the proposed draft permit. The current permit requires the collection of two (2) dry weather event samples for PCB analysis, the requirement of which was fulfilled by the Authority. In the fifth year of the current permit cycle, the Authority was notified by the Virginia Department of Environmental Quality (the "DEQ") that the current permit contained an inadvertent error, and that there should also have been a requirement for two (2) wet weather event samples for PCB analysis. The Authority was given an option to obtain the two (2) wet weather samples under the current permit, or to have the requirement for wet weather PCB sampling extended into the new permit. The Authority is committed to accomplish the additional two (2) wet weather event samples prior to the end of the current permit cycle and, in fact, obtained the first sample the week of June 23, 2014. The second wet weather event sample will occur prior to the expiration of the current permit on September 30, 2014.

The Authority again states its strong opposition to the required use of EPA Method 1668 for total PCBs for monitoring and analysis. The basis for our opposition is that Method 1668 is disallowed by 40 CFR 136.1, and 40 CFR 136.1 is incorporated within the VPDES regulations.

The Authority also objects strongly to any reference to a PCB Pollutant Minimization Plan (PMP) in the proposed permit, particularly one that is based on any potential future (not yet in existence) TMDL Waste Load Allocation (WLA) being exceeded. Inserting the requirement for a PMP into a permit prior to a WLA being determined fails to provide adequate notice of the specific future requirement due to the future WLA being an unknown. The Authority simply cannot, nor should it be asked to, agree to a permit containing requirements that are based on some yet unknown quantities or values.

Finally, with regard to PCBs, the proposed permit includes the standard TMDL reopener language in Part I B.9. As such, the DEQ already has a mechanism to reopen the permit for any TMDL, which includes a TMDL for PCBs. Since the Authority will have accomplished all PCB sampling (both wet and dry weather events) by the end of the current permit cycle, it will have fulfilled its commitment to provide data (although our stated position is that the use of the data is drawn into question based on 40 CFR 136.1) to assist the DEQ with the TMDL development. Therefore, it is the Authority's position that

no additional TMDL reopener language beyond that identified in Part I B.9 is necessary and, as such, Part I B.11 should be removed in its entirety from the proposed permit.

2. PART I A.2 – LIMITATIONS AND MONITORING REQUIREMENTS – AMMONIA-N, Jun-Dec (18.0 MGD Tier)

The Authority questions the limited number of data points (stream data) used to develop the 90th percentile maximum for pH, which in turn significantly impacts the calculation for the Reasonable Potential threshold used to determine whether limitations for Ammonia-N are required. The Fact Sheet that supports the proposed draft permit indicates that a pH value of 8.3 standard units is representative of the 90th percentile for this section of the New River. Attached under "Exhibit A" please find a preponderance of pH data that supports a 90th percentile pH value of 7.9 standard units for this section of the New River. The Authority respectfully requests DEQ use the more representative pH value of 7.9 standard units in the calculation for the Reasonable Potential threshold used to determine whether an Ammonia-N limit is required.

3. PART I D.1.b – WHOLE EFFLUENT TOXICITY PROGRAM (9.0 MGD)

In the current permit, the endpoint used is "Chronic NOEC greater than or equal to 14% equivalent to a TUc of less than or equal to 7.14." The proposed draft permit indicates the endpoint used is "Chronic NOEC greater than or equal to 15% equivalent to a TUc of less than or equal to 6.66." In reviewing the WET test endpoints spreadsheet in Appendix F to the proposed draft permit Fact Sheet, it appears the "% flow to be used from MIX.EXE" value has changed from 3.1% to 2.67%. Please verify this change in value and indicate the driver for this change.

4. PART III – BIOSOLIDS

In general, the Authority objects to Part III of the proposed draft permit being presented in "track changes" format, as it can be interpreted that this portion of the permit is in a state of flux or subject to change. It is our opinion that the proposed draft permit should be complete from the perspective of DEQ before any advertisement that DEQ is receiving public comment regarding the proposed permit. Secondly, it appears that the entire biosolids regulations have been pasted into Part III of the proposed draft permit. As such, Part III of the proposed draft permit contains numerous acronyms that make the document confusing and difficult to navigate. Lastly, all notifications associated with the biosolids land application program are presumed to be made to the BRRO-Roanoke, since no other requirements are identified in the proposed draft permit. This may be problematic for DEQ and the Authority, in that it is unclear whether certain biosolids requirements are associated with the BRRO-Roanoke or the BRRO-Lynchburg. Attached under "Exhibit B" please find a list of potential conflicts related to notification requirements that may come into questions. This list should not be considered as an exhaustive list of potential notification issues as currently identified in the proposed draft permit.

Part III E.4.b – Notifications of Sign Posting – Paragraph b. requires written notification to the DEQ-BRRO and the chief executive officer or designee for the local government where the site is located, to include the DEQ Control Identification. Where can we obtain these numbers?

Part III J.2 – Other Special Conditions – The proposed draft permit references "Attachment A" as the document that identifies the approved land application sites associated with this permit. There is no "Attachment A" to the proposed draft permit, which could be construed as the Authority not having any approved land application sites at the issuance of this permit. This is obviously not the case, and therefore, the Authority objects to issuance of this permit without our approved land application sites being identified in "Attachment A" to the permit.

5. FACT SHEET – SPECIAL CONDITION TABLE (Bottom of Page 16)

We believe an error exists in this chart (red font) wherein reference is made to "DOC," and that the entire section in red font should be deleted.

EXHIBIT A

Pepper's Ferry RWTA

Sorted pH Data - 90th Percentile

Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data
9.20	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
9.00	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.90	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.80	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.80	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.70	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.70	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.70	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.60	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.60	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.60	8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.60	8.10	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.60	8.10	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60
8.50	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.50	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.50	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.50	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.90	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.40	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.10	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.00	8.00	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.30	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.70	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60	7.60
8.20	8.00	7.90	7.90	7.80	7.80	7.70	7.70	7.60	7.60

Pepper's Ferry RWTA
Sorted pH Data - 90th Percentile

Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data
7.60	7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.60	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.40
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.30
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.30
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.30
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.30
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.30
7.60	7.60	7.50	7.50	7.50	7.50	7.40	7.40	7.40	7.30

Pepper's Ferry RWTA
Sorted pH Data - 90th Percentile

Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.14	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.30	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00	7.00
7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00	6.90
7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00	6.90
7.30	7.30	7.20	7.20	7.20	7.10	7.10	7.10	7.00	6.90

Pepper's Ferry RWTA
Sorted pH Data - 90th Percentile

Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data	Sorted pH Data
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.60						
6.90	6.80	6.70	6.50						
6.90	6.80	6.70	6.50						
6.90	6.80	6.70	6.50						
6.90	6.80	6.70	6.40						
6.90	6.80	6.70	6.40						
6.90	6.80	6.70	6.40						
6.90	6.80	6.70	6.40						
6.90	6.80	6.70	6.40						
6.90	6.80	6.70	6.40						
6.90	6.80	6.70	6.30						
6.90	6.80	6.70	6.30						
6.90	6.80	6.70	6.30						
6.90	6.80	6.70	6.30						
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.80	6.70							
6.90	6.70	6.70							
6.90	6.70	6.70							
6.90	6.70	6.70							
6.90	6.70	6.60							
6.90	6.70	6.60							
6.90	6.70	6.60							
6.80	6.70	6.60							
6.80	6.70	6.60							

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
1/1/2013	7.70		7.40	
1/2/2013	7.80		7.60	
1/3/2013	7.90		7.60	
1/4/2013	7.90		7.60	
1/5/2013	7.90		7.70	
1/6/2013	7.90		7.60	
1/7/2013	8.00		7.70	
1/8/2013	7.90		7.70	
1/9/2013	7.80		7.20	
1/10/2013	7.50		7.20	
1/11/2013	7.80		7.30	
1/12/2013	7.70		7.60	
1/13/2013	7.80		7.60	
1/14/2013	8.10		7.50	
1/15/2013	7.80		7.50	
1/16/2013	7.90		7.50	
1/17/2013	8.00		7.80	
1/18/2013	8.40		7.20	
1/19/2013	7.50		7.30	
1/20/2013	7.50		7.20	
1/21/2013	7.50		7.30	
1/22/2013	7.70		7.50	
1/23/2013	8.00		7.50	
1/24/2013	8.10		7.60	
1/25/2013	8.20		7.70	
1/26/2013	8.40		7.70	
1/27/2013	8.20		7.70	
1/28/2013	7.90		7.60	
1/29/2013	7.70		7.40	
1/30/2013	7.60		7.50	
1/31/2013	7.70		7.50	
2/1/2013	8.10		7.40	
2/2/2013	8.40		7.50	
2/3/2013	8.10		7.70	
2/4/2013	9.00		7.70	
2/5/2013	8.10		7.60	
2/6/2013	8.00		7.70	
2/7/2013	8.40		7.30	
2/8/2013	8.10		7.50	
2/9/2013	7.90		7.60	
2/10/2013	7.80		7.50	
2/11/2013	7.60		7.40	
2/12/2013	7.70		7.50	
2/13/2013	7.90		7.50	
2/14/2013	7.70		7.40	
2/15/2013	7.50		7.30	
2/16/2013	7.50		7.40	
2/17/2013	7.60		7.30	
2/18/2013	7.60		7.40	
2/19/2013	7.60		7.30	
2/20/2013	7.60		7.40	
2/21/2013	7.70		7.40	
2/22/2013	7.80		7.50	
2/23/2013	7.80		7.60	

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
2/24/2013	7.90		7.60	
2/25/2013	7.80		7.40	
2/26/2013	7.50		7.40	
2/27/2013	7.60		7.20	
2/28/2013	7.60		7.30	
3/1/2013	7.80		7.40	
3/2/2013	7.80		7.60	
3/3/2013	7.80		7.60	
3/4/2013	7.90		7.60	
3/5/2013	8.30		7.70	
3/6/2013	8.10		7.70	
3/7/2013	7.90		7.40	
3/8/2013	7.50		7.40	
3/9/2013	7.80		7.50	
3/10/2013	7.80		7.60	
3/11/2013	7.80		7.50	
3/12/2013	7.90		7.60	
3/13/2013	8.30		7.70	
3/14/2013	8.10		7.60	
3/15/2013	8.00		7.80	
3/16/2013	7.90		7.60	
3/17/2013	7.70		7.50	
3/18/2013	7.70		7.50	
3/19/2013	7.90		7.40	
3/20/2013	7.90		7.60	
3/21/2013	7.90		7.70	
3/22/2013	8.20		7.70	
3/23/2013	8.10		7.70	
3/24/2013	8.00		7.70	
3/25/2013	7.90		7.60	
3/26/2013	7.90		7.70	
3/27/2013	8.00		7.60	
3/28/2013	8.00		7.60	
3/29/2013	8.30		7.70	
3/30/2013	8.30		7.70	
3/31/2013	8.00		7.60	
4/1/2013	8.10		7.60	
4/2/2013	8.50		7.80	
4/3/2013	8.50		7.80	
4/4/2013	8.30		7.70	
4/5/2013	8.20		7.50	
4/6/2013	8.50		7.60	
4/7/2013	8.40		7.60	
4/8/2013	8.70		7.70	
4/9/2013	8.60		7.80	
4/10/2013	8.90		7.80	
4/11/2013	8.60		7.70	
4/12/2013	8.10		7.50	
4/13/2013	8.00		7.70	
4/14/2013	7.90		7.60	
4/15/2013	7.60		7.40	
4/16/2013	8.10		7.50	
4/17/2013	8.00		7.40	
4/18/2013	8.00		7.60	

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
4/19/2013	7.70		7.60	
4/20/2013	8.20		7.60	
4/21/2013	7.90		7.50	
4/22/2013	8.00		7.50	
4/23/2013	7.80		7.60	
4/24/2013	8.30		7.60	
4/25/2013	8.70		7.60	
4/26/2013	8.80		7.80	
4/27/2013	8.60		7.60	
4/28/2013	7.90		7.50	
4/29/2013	8.60		7.60	
4/30/2013	8.30		7.50	
5/1/2013	8.30		7.70	
5/2/2013	8.40		7.80	
5/3/2013	8.40		7.60	
5/4/2013	8.00		7.60	
5/5/2013	8.10		7.70	
5/6/2013	7.90		7.60	
5/7/2013	8.00		7.60	
5/8/2013	8.10		7.70	
5/9/2013	8.10		7.70	
5/10/2013	7.70		7.40	
5/11/2013	7.50		7.20	
5/12/2013	7.70		7.30	
5/13/2013	7.70		7.30	
5/14/2013	7.70		7.30	
5/15/2013	7.80		7.60	
5/16/2013	7.90		7.60	
5/17/2013	8.00		7.50	
5/18/2013	7.90		7.60	
5/19/2013	7.80		7.60	
5/20/2013	8.00		7.60	
5/21/2013	7.90		7.40	
5/22/2013	7.80		7.50	
5/23/2013	7.60		7.50	
5/24/2013	7.90		7.50	
5/25/2013	7.80		7.60	
5/26/2013	7.80		7.50	
5/27/2013	7.90		7.50	
5/28/2013	7.90		7.50	
5/29/2013	8.30		7.80	
5/30/2013	8.10		7.40	
5/31/2013	7.90		7.30	
6/1/2013	8.00	8.20	7.50	7.10
6/2/2013	7.80	7.90	7.40	6.90
6/3/2013	7.90	8.20	7.20	7.10
6/4/2013	8.10	8.30	7.30	7.10
6/5/2013	7.90	8.00	7.20	7.10
6/6/2013	7.80	7.70	7.30	6.90
6/7/2013	7.60	7.20	7.20	7.00
6/8/2013	7.80	7.50	7.40	6.80
6/9/2013	7.70	7.60	7.20	7.00
6/10/2013	7.50	7.30	7.10	7.00
6/11/2013	7.60	7.30	7.10	7.00

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
6/12/2013	7.70	7.30	7.30	7.10
6/13/2013	7.90	7.30	7.50	7.00
6/14/2013	8.00	7.40	7.60	7.00
6/15/2013	8.10	7.90	7.60	7.00
6/16/2013	8.00	7.50	7.60	7.00
6/17/2013	8.00	7.60	7.30	7.00
6/18/2013	7.60	7.50	7.30	7.00
6/19/2013	7.80	7.30	7.50	7.00
6/20/2013	7.90	7.40	7.40	7.00
6/21/2013	8.30	7.80	7.40	6.90
6/22/2013	8.50	7.90	7.40	7.00
6/23/2013	8.60	8.10	7.60	7.00
6/24/2013	8.40	7.90	7.20	7.00
6/25/2013	9.20	7.70	7.40	7.00
6/26/2013	8.10	7.50	7.40	6.90
6/27/2013	7.60	7.70	7.10	7.00
6/28/2013	7.90	7.90	7.00	7.00
6/29/2013	7.90	8.10	7.30	7.00
6/30/2013	8.20	7.90	7.30	7.00
7/1/2013	8.00	7.70	7.10	6.90
7/2/2013	7.70	7.30	7.30	7.00
7/3/2013	7.80	7.10	7.20	7.00
7/4/2013	7.80	7.20	7.60	6.80
7/5/2013	7.70	7.00	7.60	6.90
7/6/2013	7.70	7.00	7.30	6.90
7/7/2013	7.40	7.10	7.20	6.90
7/8/2013	7.50	7.10	7.20	6.80
7/9/2013	7.40	7.10	7.30	7.00
7/10/2013	7.50	7.10	7.30	6.90
7/11/2013	7.80	7.10	7.30	7.00
7/12/2013	7.70	7.10	7.50	7.00
7/13/2013	7.70	7.10	7.50	7.00
7/14/2013	7.80	7.20	7.40	7.00
7/15/2013	8.00	7.20	7.60	7.00
7/16/2013	7.80	7.30	7.40	7.00
7/17/2013	7.70	7.20	7.30	6.70
7/18/2013	7.70	6.90	7.30	6.70
7/19/2013	7.70	6.90	7.50	6.60
7/20/2013	7.80	6.90	7.50	6.60
7/21/2013	8.00	6.90	7.40	6.60
7/22/2013	8.70	7.00	7.70	6.60
7/23/2013	8.20	7.10	7.70	6.60
7/24/2013	8.20	7.10	7.70	6.60
7/25/2013	8.00	7.30	7.50	6.60
7/26/2013	7.90	7.20	7.40	6.60
7/27/2013	7.40	7.20	7.20	6.70
7/28/2013	7.50	7.00	7.30	6.80
7/29/2013	7.60	6.90	7.30	6.80
7/30/2013	7.70	6.90	7.30	6.60
7/31/2013	7.50	6.70	7.30	6.60
8/1/2013	7.40	6.60	7.30	6.50
8/2/2013	7.50	6.60	7.10	6.40
8/3/2013	7.60	6.60	7.20	6.50
8/4/2013	7.50	6.60	7.20	6.60

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
8/5/2013	7.70	6.80	7.10	6.60
8/6/2013	7.60	6.90	7.30	6.80
8/7/2013	7.50	7.20	7.30	7.00
8/8/2013	7.70	7.30	7.30	7.20
8/9/2013	7.80	7.20	7.30	7.10
8/10/2013	8.00	7.10	7.40	6.50
8/11/2013	7.90	6.60	7.20	6.30
8/12/2013	8.00	6.60	7.40	6.30
8/13/2013	8.00	6.40	7.40	6.30
8/14/2013	7.90	6.40	7.30	6.30
8/15/2013	8.00	7.70	7.30	6.40
8/16/2013	7.90	7.90	7.20	6.40
8/17/2013	7.70	7.50	7.10	6.70
8/18/2013	7.60	7.10	7.10	6.70
8/19/2013	7.70	7.00	7.30	6.60
8/20/2013	7.80	7.10	7.60	6.70
8/21/2013	7.90	7.10	7.60	6.60
8/22/2013	7.60	7.00	7.20	6.70
8/23/2013	7.40	7.20	7.10	6.60
8/24/2013	7.70	7.40	7.20	6.70
8/25/2013	7.90	7.20	7.40	6.70
8/26/2013	8.20	7.60	7.50	6.70
8/27/2013	7.90	7.40	7.50	6.80
8/28/2013	7.80	7.30	7.40	6.80
8/29/2013	8.20	7.40	7.60	6.70
8/30/2013	8.00	7.50	7.40	6.70
8/31/2013	7.70	7.30	7.30	6.70
9/1/2013	7.80	7.30	7.30	6.70
9/2/2013	7.80	7.60	7.30	6.80
9/3/2013	8.00	7.90	7.40	6.70
9/4/2013	8.30	8.20	7.40	7.00
9/5/2013	8.40	8.20	7.60	6.90
9/6/2013	8.00	7.90	7.60	6.90
9/7/2013	8.00	7.70	7.70	6.80
9/8/2013	8.00	7.50	7.40	6.70
9/9/2013	7.70	7.30	7.30	6.80
9/10/2013	7.90	7.40	7.20	6.70
9/11/2013	7.80	7.50	7.20	6.70
9/12/2013	8.00	7.40	7.30	6.80
9/13/2013	8.00	7.60	7.30	6.70
9/14/2013	8.00	7.60	7.30	6.70
9/15/2013	8.20	7.40	7.40	6.80
9/16/2013	8.00	7.20	7.50	6.80
9/17/2013	7.80	7.40	7.60	6.80
9/18/2013	8.00	7.20	7.50	6.80
9/19/2013	7.70	7.00	7.20	6.70
9/20/2013	7.50	7.20	7.20	6.70
9/21/2013	7.40	7.00	7.20	6.70
9/22/2013	7.60	7.10	7.30	6.70
9/23/2013	7.70	7.00	7.50	6.70
9/24/2013	7.70	7.00	7.40	6.70
9/25/2013	7.70	7.00	7.50	6.60
9/26/2013	7.90	7.10	7.30	6.70
9/27/2013	7.70	7.20	7.40	6.80

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
9/28/2013	7.80	7.10	7.40	6.70
9/29/2013	7.70	7.10	7.30	6.80
9/30/2013	7.70	7.10	7.40	6.80
10/1/2013	7.70	7.20	7.30	6.70
10/2/2013	7.70	7.30	7.40	6.80
10/3/2013	7.80	7.20	7.20	6.80
10/4/2013	7.90	7.20	7.40	6.70
10/5/2013	7.70	7.10	7.40	6.60
10/6/2013	7.90	7.00	7.30	6.70
10/7/2013	8.00	7.00	7.30	6.70
10/8/2013	7.80	6.90	7.40	6.70
10/9/2013	7.60	7.00	7.10	6.70
10/10/2013	7.50	7.00	7.30	6.70
10/11/2013	7.70	7.00	7.20	6.70
10/12/2013	7.70	7.00	7.50	6.70
10/13/2013	7.90	6.90	7.50	6.70
10/14/2013	7.80	7.00	7.50	6.70
10/15/2013	7.90	7.10	7.60	6.70
10/16/2013	8.00	7.10	7.60	6.70
10/17/2013	8.00	7.00	7.30	6.70
10/18/2013	7.70	7.20	7.40	6.70
10/19/2013	7.70	7.10	7.60	6.80
10/20/2013	7.70	7.40	7.50	6.80
10/21/2013	8.10	7.40	7.30	6.90
10/22/2013	7.90	7.10	7.50	6.80
10/23/2013	8.00	7.30	7.50	6.80
10/24/2013	8.00	7.10	7.20	6.90
10/25/2013	7.70	7.20	7.40	6.90
10/26/2013	7.70	7.40	7.40	6.80
10/27/2013	7.60	7.40	7.20	6.80
10/28/2013	7.40	7.14	7.20	6.80
10/29/2013	7.80	7.30	7.30	6.70
10/30/2013	7.50	7.10	7.30	6.80
10/31/2013	7.50	6.90	7.30	6.70
11/1/2013	7.90	7.40	7.10	6.70
11/2/2013	8.20	7.40	7.40	6.90
11/3/2013	8.20	7.30	7.60	6.90
11/4/2013	8.00	7.40	7.20	6.80
11/5/2013	7.90	7.50	7.30	6.90
11/6/2013	7.90	7.40	7.30	6.90
11/7/2013	8.00	7.30	7.20	6.80
11/8/2013	8.30	7.70	7.50	7.00
11/9/2013	8.20	7.60	7.40	6.90
11/10/2013	8.30	7.70	7.50	6.80
11/11/2013	8.20	8.10	7.40	7.00
11/12/2013	7.90	7.90	7.40	6.70
11/13/2013	8.10	7.70	7.60	7.00
11/14/2013	8.00	8.20	7.50	6.80
11/15/2013	7.90	7.60	7.50	6.90
11/16/2013	7.70	7.10	7.50	6.90
11/17/2013	7.80	7.30	7.60	6.80
11/18/2013	7.90	7.60	7.50	6.80
11/19/2013	8.40	7.70	7.60	6.90
11/20/2013	8.30	7.80	7.40	6.90

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
11/21/2013	8.30	7.80	7.70	7.00
11/22/2013	8.40	7.80	7.80	7.00
11/23/2013	8.00	8.00	7.60	7.00
11/24/2013	8.10	8.00	7.40	7.20
11/25/2013	7.90	7.80	7.40	7.10
11/26/2013	7.40	7.20	7.30	7.00
11/27/2013	7.40	7.20	7.30	7.00
11/28/2013	7.50	7.20	7.30	7.10
11/29/2013	7.50	7.30	7.20	7.00
11/30/2013	7.60	7.40	7.50	7.10
12/1/2013	7.80	7.30	7.50	7.10
12/2/2013	7.70	7.60	7.30	7.10
12/3/2013	7.80	7.30	7.20	7.10
12/4/2013	8.20	7.40	7.30	7.10
12/5/2013	7.80	7.20	7.30	6.90
12/6/2013	7.80	7.20	7.20	6.90
12/7/2013	7.90	7.30	7.50	7.00
12/8/2013	7.80	7.50	7.50	7.00
12/9/2013	7.90	7.10	7.50	7.00
12/10/2013	7.80	7.10	7.30	7.00
12/11/2013	7.50	7.30	7.30	7.10
12/12/2013	7.80	7.40	7.40	7.10
12/13/2013	7.60	7.40	7.40	7.10
12/14/2013	7.60	7.20	7.40	7.10
12/15/2013	7.60	7.30	7.40	7.10
12/16/2013	7.80	7.50	7.40	7.10
12/17/2013	7.80	7.50	7.60	7.10
12/18/2013	8.10	7.50	7.50	7.20
12/19/2013	7.90	7.50	7.20	7.10
12/20/2013	7.70	7.40	7.30	7.10
12/21/2013	7.60	7.40	7.40	7.00
12/22/2013	7.40	7.30	7.20	7.10
12/23/2013	7.40	7.30	7.20	7.10
12/24/2013	7.50	7.20	7.30	7.00
12/25/2013	7.50	7.20	7.40	7.00
12/26/2013	7.60	7.30	7.40	7.00
12/27/2013	7.50	7.20	7.40	7.10
12/28/2013	7.50	7.20	7.40	7.00
12/29/2013	7.70	7.20	7.30	6.70
12/30/2013	8.10	7.10	7.60	7.00
12/31/2013	7.60	7.20	7.30	7.00
1/1/2014	7.40	7.30	7.30	7.00
1/2/2014	7.50	7.20	7.30	7.10
1/3/2014	7.50	7.30	7.40	7.10
1/4/2014	7.50	7.30	7.30	7.00
1/5/2014	7.50	7.30	7.30	7.20
1/6/2014	7.50	7.40	7.30	7.10
1/7/2014	7.50	7.30	7.30	7.10
1/8/2014	7.60	7.70	7.40	7.20
1/9/2014	7.60	7.40	7.40	7.10
1/10/2014	7.50	7.40	7.50	7.20
1/11/2014	7.60	7.30	7.30	7.10
1/12/2014	7.60	7.20	7.40	7.10
1/13/2014	7.50	7.20	7.40	7.20

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
1/14/2014	7.60	7.40	7.20	7.10
1/15/2014	7.90	7.30	7.30	7.20
1/16/2014	7.50	7.40	7.30	7.20
1/17/2014	7.70	7.40	7.40	7.10
1/18/2014	7.70	7.40	7.50	7.20
1/19/2014	7.60	7.40	7.40	7.20
1/20/2014	7.60	7.40	7.40	7.20
1/21/2014	7.60	7.40	7.40	7.20
1/22/2014	7.60	7.40	7.40	7.20
1/23/2014	7.50	7.50	7.40	7.20
1/24/2014	7.70	7.50	7.50	7.30
1/25/2014	7.50	7.50	7.50	7.20
1/26/2014	7.70	7.50	7.50	7.30
1/27/2014	7.80	7.60	7.50	7.30
1/28/2014	7.70	7.50	7.50	7.30
1/29/2014	7.90	7.40	7.20	7.20
1/30/2014	7.50	7.50	7.30	7.20
1/31/2014	7.80	7.50	7.40	7.10
2/1/2014	7.50	7.50	7.30	7.20
2/2/2014	7.40	7.40	7.30	7.20
2/3/2014	7.80	7.80	7.30	7.10
2/4/2014	7.60	7.50	7.10	7.20
2/5/2014	7.80	7.40	7.40	7.10
2/6/2014	7.70	7.50	7.40	7.20
2/7/2014	7.60	7.60	7.50	7.10
2/8/2014	7.60	7.50	7.50	7.10
2/9/2014	7.50	7.40	7.50	7.20
2/10/2014	8.00	7.50	7.40	7.20
2/11/2014	7.60	7.60	7.40	7.20
2/12/2014	7.60	7.60	7.50	7.10
2/13/2014	7.60	7.40	7.50	7.20
2/14/2014	7.50	7.70	7.20	7.10
2/15/2014	7.50	7.60	7.40	7.20
2/16/2014	7.60	7.70	7.30	7.20
2/17/2014	7.60	7.70	7.40	7.20
2/18/2014	7.60	7.90	7.50	7.10
2/19/2014	7.80	7.80	7.60	7.10
2/20/2014	7.70	7.50	7.40	7.10
2/21/2014	7.70	7.30	7.40	7.10
2/22/2014	7.60	7.20	7.40	7.00
2/23/2014	7.60	7.30	7.20	7.10
2/24/2014	7.70	7.30	7.30	7.20
2/25/2014	7.50	7.40	7.30	7.20
2/26/2014	7.70	7.40	7.40	7.20
2/27/2014	7.70	7.60	7.50	7.20
2/28/2014	7.90	7.60	7.30	7.10
3/1/2014	7.50	7.40	7.30	7.20
3/2/2014	7.50	7.40	7.30	7.10
3/3/2014	7.60	7.30	7.20	7.10
3/4/2014	7.70	7.40	7.40	7.10
3/5/2014	7.80	7.50	7.40	7.10
3/6/2014	7.70	7.30	7.30	7.10
3/7/2014	7.50	7.30	7.40	6.90
3/8/2014	7.70	7.40	7.50	7.10

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
3/9/2014	7.60	7.50	7.40	7.00
3/10/2014	7.60	7.50	7.50	7.00
3/11/2014	7.70	7.50	7.50	7.00
3/12/2014	7.60	7.60	7.30	7.10
3/13/2014	7.70	7.40	7.50	7.10
3/14/2014	7.60	7.70	7.50	7.10
3/15/2014	7.70	7.70	7.40	7.00
3/16/2014	7.70	7.70	7.50	7.00
3/17/2014	7.50	7.30	7.50	7.10
3/18/2014	7.60	7.50	7.40	7.10
3/19/2014	7.80	7.50	7.60	7.10
3/20/2014	7.90	7.70	7.60	7.10
3/21/2014	8.00	7.70	7.60	7.10
3/22/2014	7.90	8.80	7.60	7.10
3/23/2014	7.80	7.80	7.50	7.10
3/24/2014	7.80	7.60	7.50	7.10
3/25/2014	7.70	7.60	7.50	7.10
3/26/2014	7.70	8.00	7.60	7.20
3/27/2014	7.60	7.80	7.50	7.20
3/28/2014	7.70	7.70	7.40	7.00
3/29/2014	7.60	7.50	7.50	7.10
3/30/2014	7.80	7.60	7.50	7.20
3/31/2014	7.90	7.60	7.60	7.20
4/1/2014	7.90	7.60	7.50	7.10
4/2/2014	7.90	7.70	7.60	7.10
4/3/2014	7.90	7.70	7.40	7.10
4/4/2014	7.80	7.40	7.50	7.00
4/5/2014	7.90	7.70	7.50	7.10
4/6/2014	7.80	7.50	7.60	7.10
4/7/2014	7.70	7.50	7.40	7.10
4/8/2014	7.60	7.40	7.50	7.10
4/9/2014	7.60	7.40	7.40	7.10
4/10/2014	7.70	7.40	7.40	7.00
4/11/2014	7.60	7.40	7.40	6.90
4/12/2014	7.90	7.40	7.50	7.00
4/13/2014	7.80	7.40	7.60	7.00
4/14/2014	7.60	7.30	7.50	7.00
4/15/2014	7.60	7.30	7.40	7.00
4/16/2014	7.80	7.40	7.50	7.00
4/17/2014	7.80	7.30	7.60	7.00
4/18/2014	7.70	7.30	7.40	6.90
4/19/2014	7.70	7.60	7.60	7.00
4/20/2014	7.70	7.40	7.60	7.00
4/21/2014	7.90	7.40	7.60	7.00
4/22/2014	7.90	7.30	7.70	6.90
4/23/2014	7.80	7.40	7.40	6.90
4/24/2014	7.60	7.40	7.40	6.90
4/25/2014	7.60	7.60	7.30	6.90
4/26/2014	7.70	7.40	7.40	7.00
4/27/2014	7.70	7.40	7.40	6.90
4/28/2014	7.70	7.20	7.40	6.90
4/29/2014	7.70	7.40	7.50	6.90
4/30/2014	7.70	7.00	7.50	6.90
5/1/2014	7.70	7.40	7.40	6.90

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
5/2/2014	7.60	7.30	7.40	6.90
5/3/2014	7.60	7.20	7.40	6.90
5/4/2014	7.60	7.30	7.30	6.90
5/5/2014	7.60	7.30	7.40	6.90
5/6/2014	7.80	7.40	7.30	6.90
5/7/2014	7.90	7.40	7.50	6.90
5/8/2014	8.00	7.50	7.50	6.90
5/9/2014	7.70	7.30	7.30	6.90
5/10/2014	7.50	7.10	7.30	6.80
5/11/2014	7.80	7.40	7.30	6.80
5/12/2014	7.80	7.40	7.40	6.80
5/13/2014	7.80	7.40	7.20	6.80
5/14/2014	7.70	7.50	7.20	6.80
5/15/2014	7.40	7.00	7.20	6.80
5/16/2014	7.40	7.00	7.20	6.80
5/17/2014	7.30	7.00	7.10	6.60
5/18/2014	7.40	7.20	7.10	6.80
5/19/2014	7.50	7.20	7.10	6.70
5/20/2014	7.30	7.20	7.00	6.80
5/21/2014	7.40	7.30	7.10	6.80
5/22/2014	7.40	7.50	7.10	6.70
5/23/2014	7.50	7.40	7.20	6.70
5/24/2014	7.60	7.30	7.20	6.80
5/25/2014	7.60	7.30	7.10	6.70
5/26/2014	7.80	7.40	7.10	6.70
5/27/2014	7.70	7.30	7.00	6.70
5/28/2014	7.90	7.50	7.20	6.80
5/29/2014	7.50	7.30	7.20	6.40
5/30/2014	7.70	7.40	7.10	6.70
5/31/2014	7.60	7.30	7.10	6.70
6/1/2014	7.50		7.10	
6/2/2014	7.70		7.10	
6/3/2014	7.40		7.10	
6/4/2014	7.60		7.10	
6/5/2014	7.50		7.10	
6/6/2014	7.50		7.10	
6/7/2014	7.60		7.20	
6/8/2014	7.50		7.20	
6/9/2014	7.80		7.30	
6/10/2014	7.60		7.20	
6/11/2014	7.60		7.00	
6/12/2014	7.40		7.10	
6/13/2014	7.60		7.10	
6/14/2014	7.90		7.10	
6/15/2014	7.80		7.20	
6/16/2014	7.90		7.10	
6/17/2014	7.50		7.20	
6/18/2014	7.60		7.20	
6/19/2014	7.80		7.20	
6/20/2014	7.90		7.30	
6/21/2014	7.90		7.20	
6/22/2014	7.80		7.10	
6/23/2014	7.90		7.20	
6/24/2014	7.90		7.10	

Pepper's Ferry RWTA
pH Data - 90th Percentile Development

Date	RAAP WTP Maximum RAW pH	NRV Reg. Water Authority Maximum RAW pH	RAAP WTP Minimum RAW pH	NRV Reg. Water Authority Minimum RAW pH
6/25/2014	7.80		7.20	
6/26/2014	7.60		7.20	

EXHIBIT B

Pepper's Ferry 2014 Permit Renewal-Land Application Requirements:

NOTIFICATIONS

- Part III B. 1. Monthly reports to be submitted to BRRO…Lynchburg or Roanoke?
- Part III B. 3. Annual Report to be submitted to BRRO…Lynchburg or Roanoke?
- Part III D. 2. NMP is to be submitted to BRRO…Lynchburg or Roanoke?
- Part III D. 3. Biosolids (Sludge) Management Plan O & M Manual to be submitted to DEQ…Roanoke or Lynchburg?
- Part III E. 2. 14 Day written notification to be delivered to DEQ…Lynchburg or Roanoke?
- Part III E. 3. d. Signs to contain the following information: *Contact information for DEQ*…Lynchburg or Roanoke?
- Part III E. 5. 24 hour notification: Permitee shall notify DEQ in writing 24 hours prior to commencing land application activities…Lynchburg or Roanoke?

From: Clarke Wallcraft [mailto:cwallcraft@jetbroadband.com]
Sent: Wednesday, July 09, 2014 3:42 PM
To: Tate, Robert (DEQ)
Cc: Foster, Kip (DEQ); Wise, Lynn (DEQ); 'Mac McCutchan'; 'Robbie Graham'; 'Mike Hutchison'
Subject: July 8th Meeting Follow-up

Bob:

Thank you again for the opportunity to meet with DEQ staff yesterday to discuss the Authority's comments related to the proposed draft VPDES permit currently in the public comment phase. Please consider this as follow-up comments on those discussions.

PCB TMDL Issues – The Authority maintains its objection to the use of EPA Method 1668 for monitoring and analysis, in that we believe it is disallowed by 40 CFR Part 136. Further, the Authority maintains its objection to Part I, B. 11 of the draft permit in its entirety, to include any future PMP requirement and WLA reference, and therefore request the entire section be removed from the permit. The Authority is also committed to obtain the one remaining wet weather sample, and to submit monitoring analysis for that sample and one other wet weather sample for which results are currently being developed; however, the Authority continues to object to the use of EPA Method 1668 related to these wet weather samples. With specific regard to the PMP requirement, the potential costs associated with this requirement could be astounding. Furthermore, the draft permit indicates the PMP must be designed to locate and reduce sources of PCBs in the collection system. The Authority owns no collection system, and questions the legality of having to develop a PMP for facilities that it does not own or operate, and commit to the associated costs, again, for facilities that the Authority does not own. Lastly, to specifically call out a TMDL for PCBs is not necessary, as there is already a reopener clause for <u>any TMDL</u> in Part I, B. 9.

Ammonia Limit – 18.0 MGD Tier – Although the Authority has provided data we believe is more representative of the 90th percentile value for pH, for use by DEQ in recalculating for RP regarding an ammonia limit at 18.0 MGD, the Authority will withdraw this request based on the fact it is extremely unlikely the 18.0 MGD tier will be triggered in the permit cycle beginning October 2014; however, the Authority will continue to collect pH, hardness and temperature data from the river and will submit that information for use by the DEQ for the permit cycle that would begin in October 2019. In the event that the permit is reopened prior to October 2019 for ammonia, the Authority proposes to provide the DEQ with pH, hardness and temperature data at that point for use in determining the 90th percentile value and calculation of any proposed ammonia limit at either 9.0 MGD or 18.0 MGD.

WET Program 9.0 MGD – Thank you for your explanation regarding the change from 7.14 tu to 6.66 tu.

Biosolids Issues – Prior to the issuance date of the permit, DEQ and the Authority will determine what aspects of the requirements in Part III (Biosolids) of the permit will occur with BRRO-Roanoke, and what requirements will occur with BRRO-Lynchburg. An attachment to the permit will clearly delineate which BRRO will be the direct contact for which portion of the permit as it relates to biosolids.

Fact Sheet – Special Condition Table – No resolution was reached regarding the language in question. Clarification should be made prior to finalization of the permit. The Authority believes the "DOC" reference is specific to a Department of Corrections facility that uses a contract land applicator holding a VPA permit, and that this reference should be removed from the Fact Sheet, as it does not pertain to the Authority.

I believe this about covers it. Again, we really appreciate the time to meet with you. We look forward to receiving additional information from you regarding our submitted comments dated July 8th, 2014, and regarding our concerns discussed in our meeting on July t8th, and further outlined herein. Thank you.

Clarke

R. Clarke Wallcraft
Executive Director

COMMONWEALTH of VIRGINIA

David K. Paylor
Director

Molly Joseph Ward
Secretary of Natural Resources

DEPARTMENT OF ENVIRONMENTAL QUALITY
Blue Ridge Regional Office
www.deq.virginia.gov

Robert J. Weld
Regional Director

Lynchburg Office
7705 Timberlake Road
Lynchburg, Virginia 24502
(434) 582-5120
Fax (434) 582-5125

Roanoke Office
3019 Peters Creek Road
Roanoke, Virginia 24019
(540) 562-6700
Fax (540) 562-6725

July 17, 2014

forwarded via e-mail (cwallcraft@jetbroadband.com) to R. Clarke Wallcraft, Executive Director, Pepper's Ferry Regional Wastewater Treatment Authority

RE: Reissuance of VPDES Permit VA0062685 – DEQ Responses to Permittee Comments on Draft Permit

Dear Mr. Wallcraft:

This letter contains responses to comments received by the Virginia Department of Environmental Quality's Blue Ridge Regional Office (DEQ) concerning draft VPDES Permit VA0062685. Initial comments were received in a letter dated July 8, 2013. After a meeting with the permittee's representatives (permittee) and DEQ representatives that afternoon, subsequent comments were received in a July 9 e-mail message. DEQ's responses are in the order of comments in the July 8 letter.

1. Part I.B.11. PCB Monitoring for Total Maximum Daily Load (TMDL) Development

   The July 7 letter and the July 8 e-mail object to Part I.B.11 in total and in part. DEQ had four phone conversations concerning the draft permit with EPA's Mark Smith. Conversations originated around June 10 and concluded July 15. EPA was aware of the chain of events concerning wet-weather PCB monitoring and the original intent to leave wet-weather PCB monitoring requirements out of the permit. After reviewing the draft permit, EPA indicated that a PCB monitoring condition was needed. Part I.B.11 was added to the draft permit, which was forwarded to the permittee for review. After hearing the permittee's concerns in the July 8 meeting about Part I.B.11, Part I.B.11 was revised and forwarded to the permittee and to EPA for further review. EPA requested the condition (as revised) remain in the permit.

   Method 1668 is an acceptable monitoring method. DEQ TMDL Guidance Memo No. 09-2001 (March 6, 2009) and Amendment No. 1 (November 1, 2011) specify use of Method 1668. Current VPDES Permit VA0062685 Part II.A.2 and draft VPDES Permit Part II.A.1.a both allow use of other methods of analysis specified in a permit.

EPA supported the permittee's contention that a pollutant minimization plan (PMP) could not be required before a TMDL is approved. Part I.B.11 was revised to hopefully address the concern. In a phone conversation July 15, DEQ conveyed to EPA the permittee's concerns about a PMP for a facility that does not own the collection system. The Authority is made up of members from the local jurisdictions that own the collection system and because of this relationship the Authority can plan, organize, and implement a coordinated effort to identify and minimize sources of this pollutant prior to discharge from the Authority's outfall. EPA and DEQ share the opinion that the permittee is ultimately responsible for discharges, regardless of collection system ownership. It is the opinion of EPA and DEQ that a PMP is a better approach than immediate establishment of a PCB limit.

Although the draft permit contains the standard TMDL reopener condition (Part I.B.9), that is insufficient reason to remove Part I.B.11. Repeating from above, EPA requested the condition (as revised) remain in the permit.

2. Part I.A.2. Limitation and Monitoring Requirements – Ammonia-N Jun-Dec (18.0 MGD Tier)

As discussed in the July 8 meeting, the stream pH data used to determine ammonia limits (and evaluate other parameters) are irrelevant to any future ammonia criteria or ammonia limits in future permits. If the Department adopts new ammonia criteria, appropriate stream pH data will be used to evaluate reasonable potential of ammonia and other toxic parameters. (It is highly unlikely that the permit will be reopened before anticipated expiration September 30, 2019.) In the July 9 e-mail message, the permittee withdrew its request for an alternative pH data set for the proposed permit. The permittee will continue to collect stream pH data and will also collect hardness and temperature stream data. DEQ requests that appropriate pH data be accompanied by corresponding temperature and hardness data from the same monitoring location.

Of less importance, pH data were obtained from the same monitoring location as for previous reissuances of VPDES Permit VA0062685. The 2009 reissuance used 88 data points spanning 120 months. The 2014 reissuance used 63 data points spanning 119 months. The resulting pH statistics were remarkably consistent.

3. Part I.D.1.b. Whole Effluent Toxicity Program (9.0 MGD Tier)

As discussed and demonstrated in the July 8 meeting, the permit writer used an incorrect mixing value to evaluate whole effluent toxicity for permit reissuance in 2009. A mixing value of 3.1% was used for the acute condition, resulting in an NOEC of greater than or equal to15% (TUc less than or equal to 6.66). The correct mixing value for the acute condition (low flow 1Q10) was 2.67%. The 3.1% mix was for high flow 1Q10 mixing, inappropriate for toxicity evaluation. Acute condition calculations in 2014 used the correct mixing value (2.67%), resulting in a NOEC of greater than or equal to14% (TUc less than or equal to 7.14). All mixing values were the same as in the 2009 permit reissuance.

4. Part III Biosolids

The draft biosolids component was deliberately forwarded in rough form. The primary intention was to get the draft permit to the permittee as soon as possible. Formatting would have taken more time. The rough form would also allow easier comparison with templates previously forwarded to the permittee. The permit writer did anticipate that more revisions could be handed down from DEQ's Office of Land Application, (OLAP). Part III as forwarded to the permittee had undergone many revisions as a result of OLAP changes to templates.

It should not be surprising that permit language would reflect the biosolids regulations. DEQ agrees that the sequencing of the various conditions could be improved.

Submittal notifications were purposely directed to "DEQ's Blue Ridge Regional Office" rather than the Lynchburg or Roanoke branch offices. The permit writer felt this gave the most flexibility to the permittee; the permittee would fulfill submittal requirements as long as required documents were received by either branch office. The permit writer has since been enlightened by both permittee and regional office's water compliance section. Rather than specify branch offices within the permit, the regional office thinks it better to add a list of "submittal sites" in an attachment to the permit transmittal letter. Any future changes in submittal procedures can made with written communication, thus avoiding need for permit modification (changing instructions in the permit). Exhibit B was forwarded to the regional office's water compliance manager for his determinations as to where specific submittals should be forwarded.

The permit writer confesses that he only recently realized the need for DEQ biosolids control identification numbers in the proposed permit (Part III.E.4.b and Part III Attachment A). With the permittee's assistance, control numbers will be generated by biosolids personnel in the Lynchburg branch office.

5. Fact Sheet Item 17 – Bases for Sludge Use & Disposal Requirements

DEQ agrees the language in red font at the bottom of page 16 should be removed from the fact sheet.

If you have any further questions or concerns, please contact me at bob.tate@deq.virginia.gov or at (540) 562-6774.

Sincerely,

Robert S. Tate
Water Permit Writer

Pepper's Ferry Regional Wastewater Treatment Authority
P. O. Box 2950 - Radford, VA 24143-2950
Phone: 540-639-3947 Fax: 540-633-0215

July 18, 2014

By Hand Delivery & Email

David K. Paylor, Director
Department of Environmental Quality
Commonwealth of Virginia
629 East Main Street
Richmond, Virginia 23219

Re: VPDES Permit No. VA0062685
Request for Public Hearing

Dear Director Paylor:

Please accept the following as Pepper's Ferry Regional Wastewater Treatment Authority's Request for Public Hearing on the proposed reissuance of the subject VPDES permit. Although we appreciate the efforts of the Blue Ridge Regional Office in processing the reissuance and attempting to work with the Authority, there are serious unresolved permit issues that merit a Public Hearing and full consideration by the State Water Control Board.

As an initial matter, we note that much of the Regional Office's basis for the PCB-related conditions to which we object is based on requests and statements from EPA Region III staff as to what they believe should be included in the permit. This basis appears repeatedly in email correspondence and in the Department's response to our comments of July 17. We respectfully submit that this is a Virginia permit and it is the Department's responsibility to determine independently the legal and appropriate permit conditions. The procedure employed by the DEQ Regional Office and EPA attempts to shift blame for the permit conditions and avoid either party having to address up front the consistency of those conditions with Virginia law, federal law (which the EPA commenter does not appear to address), and the concerns raised by the Authority.

The Permit Provisions at Issue

1. Part I.B.11 Analytical Method for PCBs

The draft provision would require the use of EPA's Method 1668 for analyses of PCB congeners. Analyses required by permit must be by EPA approved methods identified in 40 CFR Part 136. 40 CFR § 136.1 (incorporated in the VPDES Regulation). Method 1668 is a developmental or experimental EPA method not listed in Part 136. The Regional Office's July 17 response that Method 1668 is "acceptable" and its references to DEQ guidance referring to

the Method for TMDL development (but not VPDES) purposes does not cure the legal requirement noted above. Even if the guidance addressed permitting (which it does not), guidance may not modify the Regulations.

Although the Authority has used and may use in the future Method 1668 selectively as an accommodation to the Department in its TMDL development program, it is unauthorized and inappropriate for the permit to purport to require its use for any mandatory permit purposes or at the instruction of the Department.

We request (as we have in comments to Blue Ridge) that the permit delete any reference to Method 1668.

2. Part I.B.11 PCB PMP Requirements

The draft provisions would also require that the Authority develop and implement a PCB Pollutant Minimization Plan (PMP) in response to certain findings that are dependent on a PCB TMDL, TMDL wasteload allocations (WLA) and/or TMDL Implementation Plans that may be developed in the future. This provision fails to give the Authority the required notice of the requirements imposed on it. The essence of the Administrative Process Act requirements for permits and other case decisions, and of due process, is reasonable notice of the requirements imposed. Va Code § 2.2-4019. Although a PCB TMDL for the New River is currently under development, prior to its development and finalization there is no way that the Authority can adequately comment on or address the need for a PMP, the substance of a possible PMP, or alternatives to the PMP approach.

In the Department's recent reissuance of the General VPDES Permit for Discharges of Storm Water Associated with Industrial Activity, 9 VAC 25-151, the Department and the State Water Control Board considered the same legal issue. The draft General Permit had similarly provided that permittees would be required to develop and implement PMPs based on the results and WLAs of TMDLs to be developed and finalized in the future. The final General Permit correctly deleted those provisions, after consideration of the legal issue by the Department.

We submit that one of the reasons for the relatively short five-year permit term is to allow the Department frequent opportunities to include in permits new and additional requirements based on new factors since the prior issuance. Moreover, the standard permit reopener is designed specifically for this purpose. It allows the Department to reopen and modify a permit during its term for any proper TMDL purpose. The reopener process provides the required notice and opportunity to properly comment for the permittee and the public.

Also, the Authority objects to the PMP requirement because a PMP necessarily requires control and authority over the collection system, the source of any PCBs in the influent. The Authority neither owns nor controls the collection system, making the proper development and implementation of a PMP impossible.

We request (as we have in comments to Blue Ridge) that the permit delete any reference to a PCB PMP requirement.

The Basis for Pepper's Ferry's Request for Public Hearing

The Authority provides the following pursuant to VA Code § 62.1-44.15.2.B.

1. The name, address and telephone number of the requestor, Pepper's Ferry Regional Wastewater Treatment Authority, are included above.

2. The Authority is acting herein as a representative of its rate payers (in addition to acting for itself). Otherwise, the Authority is acting as the representative for no other person.

3. The Authority requests the public hearing because of what we conclude to be the inappropriateness and illegality of the provisions challenged, and because implementation of the challenged provisions will adversely impact the Authority and its rate payers, without the Authority having the required notice of requirements to be imposed and without thereby the ability to adequately comment, respond or plan.

   At the public hearing the Authority will address the inaccuracy and other issues with Method 1668 that caused EPA in 2011 to withdraw the Method for consideration for inclusion in Part 136 (EPA's then proposed Part 136 Method Update Rule); and the costs and other adverse impacts on the Authority from any required use of the Method. The Authority will demonstrate that the Method (although it may be appropriate for Department use in a developmental effort utilizing a large averaged data base such as TMDL development) does not currently have the accuracy needed for determinations of PCB concentrations at specific times from specific sources, illustrating EPA's 2011 withdrawal from Part 136 consideration.

   The Authority will also at the public hearing address (a) the costs and other impacts of the possible development and implementation of a PCB PMP and (b) alternatives to a PMP; and the difficulty of evaluating these in the absence of any information concerning (x) the substance of any possible future TMDL or (y) the manner in which the TMDL, TMDL WLAs or any TMDL Implementation Plan may address the possible discharge of PCBs from this point source. Neither the Department nor the Authority knows anything of substance now about a possible future New River TMDL or its approach to possible POTW point sources. The absence of knowledge prevents the Authority from proposing that the permit include any potential alternatives to the PMP approach. This illustrates the practical reason (in addition to the Va Code requirement) that agency case decisions should provide an adequate basis for the affected party to know the requirements to be imposed on it. At the time that there is a final TMDL, the Authority will be able to evaluate any proposed POTW response.

   The Authority will further address the ownership and O&M responsibilities of the collection system, and its lack of authority thereby.

4. The interest of the Authority and its rate payers in the identified permit conditions and the extent that such interest is affected by the permit proposal are addressed above.

5. The conditions of the permit in question and our specific requests are addressed above.

Accordingly, in accordance with the Code section cited above and the Department's Regulations, we request that the Department convene the Public Hearing. We appreciate the Department's continuing assistance in this matter. Please direct any questions concerning the request for public hearing to Richard H. Sedgley, esq. (804-716-9021 or dick@aqualaw.com).

Sincerely,

R. Clarke Wallcraft

R. Clarke Wallcraft
Executive Director

Copy: Robert Weld, BRRO Director
PFRWTA Board
Richard H. Sedgley, esq.

COMMONWEALTH of VIRGINIA

DEPARTMENT OF ENVIRONMENTAL QUALITY
Street address: 629 East Main Street, Richmond, Virginia 23219
Mailing address: P.O. Box 1105, Richmond, Virginia 23218
Fax: 804-698-4019 - TDD (804) 698-4021
www.deq.virginia.gov

Molly Joseph Ward
Secretary of Natural Resources

David K. Paylor
Director

(804) 698-4020
1-800-592-5482

August 14, 2014

Mr. R. Clarke Wallcraft
Executive Director
Pepper's Ferry Regional Wastewater Treatment Authority
P. O. Box 2950
Radford, VA 24143-2950

Re: VPDES Permit No. VA0062685
Request for Public Hearing

Dear Mr. Wallcraft:

I am responding to your letter of July 18, 2014, in which you requested a public hearing over issues contained in the draft VPDES permit (VA0062685) for the Pepper's Ferry Regional Wastewater Treatment Plant. Staff from both our Central and Blue Ridge Regional Offices has reviewed the concerns you identified as they relate to internal agency guidance as well as pertinent regulations. As a result of these discussions, the agency has modified its position on certain permit conditions contained in the draft permit. I will address the issues in the order they were presented in your letter.

1. Part I.B.11 Analytical Method for Polychlorinated Biphenyl's (PCB's)

It is our understanding that the Authority has collected two additional wet weather samples; and the analysis, in accordance with EPA Method 1668, is currently underway. If the Agency receives these analyses prior to September 15, 2014, and after Q/A Q/C review by staff, the results meet our needs for Total Maximum Daily Load (TMDL) development, then paragraphs a., b., c., d. and f. of this special condition will be removed from the permit.

2. Part I.B.11 PCB Pollutant Minimization Plan (PMP) Requirements

The Pepper's Ferry facility discharges directly into the New River which is designated as an impaired stream segment for PCBs. The TMDL for PCBs on the New River is scheduled to be completed by July 2016. In light of the fact that the TMDL is not yet complete, paragraph e. of this special condition that speaks to the need for a PMP to be developed will be removed from the permit. If the results of the TMDL indicate further steps to control PCBs from the Pepper's

Ferry facility are warranted, the permit may be reopened in accordance with the Part I.B.9. Total Maximum Daily Load (TMDL) Reopener and include steps to address PCBs.

I hope that these modifications to the draft permit are acceptable and that you will withdraw your request for a public hearing on these matters. If you have any additional questions, please feel free to contact Robert Weld at 540-562-6870 or via email him at robert.weld@deq.virginia.gov.

Sincerely,

David K. Paylor

cc: Richard H. Sedgley, Esq.
Robert Weld. BRRO Regional Director

Pepper's Ferry Regional Wastewater Treatment Authority
P. O. Box 2950 • Radford, VA 24143-2950

August 19, 2014

David K. Paylor, Director
Department of Environmental Quality
Commonwealth of Virginia
629 East Main Street
Richmond, Virginia 23219

Re: VPDES Permit No. VA0062685
Public Hearing Request

Dear Director Paylor:

I am in receipt of your August 14, 2014 letter in response to the Pepper's Ferry Regional Wastewater Treatment Authority's (the "Authority") Request for Public Hearing on the proposed reissuance of the subject VPDES permit. Let me take this opportunity to thank you for your consideration of the Authority's request, and for the resulting modifications by the agency to certain conditions contained in Part I.B.11 of the draft permit. Considering the agency's action, as described in your letter, the Authority hereby withdraws its Request for a Public Hearing on this matter.

Sincerely,

R. Clarke Wallcraft

R. Clarke Wallcraft
Executive Director

Copy: Robert Weld, BRRO Director
PFRWTA Board
Richard H. Sedgley, esq.

RECEIVED
AUG 2 0 2014
DEQ - BRRO

Area Code (540) 639-3947 • Fax (540) 633-0215