Subject: Guidance Memo No. 13-2001
Implementation Guidance for the Reissuance of the General VPDES Permit Regulation for Discharges From Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests, 9VAC25-120

TO: Regional Directors
FROM: Melanie D. Davenport, Director
DATE: February 27, 2013
COPIES: James Golden, Rick Weeks, Regional Water Permit Managers, Regional Remediation Managers, Regional Waste Permit Managers, Regional Water Compliance Managers

Summary:
On September 27, 2012, the State Water Control Board adopted amendments to the General VPDES Permit Regulation for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests, 9VAC25-120. The regulation and general permit (VAG83) become effective on February 26, 2013, and will expire on February 25, 2018.

One significant change for this reissuance is the inclusion of a provision that allows specified short term projects (14 days or less in duration) and hydrostatic test discharges to be automatically covered under the permit without the requirement to submit a registration statement. The owner is authorized to discharge under the permit immediately upon the permit’s effective date, and must notify the Department within 14 days of the discharge’s completion. These discharges are subject to the same effluent limitations in the permit as other similar discharges.

This guidance is intended to aid regional permit writers and petroleum program case managers with the management of sites to be covered under this permit. This guidance document contains example letters that staff may use for the administration of the regulation, along with forms that permittees may use to request termination of coverage and transfer of ownership.

This guidance replaces GM08-2006.

Electronic Copy:
An electronic copy of this guidance in PDF format is available for staff internally on DEQNET, and for the general public on DEQ’s website at: http://www.deq.virginia.gov/Programs/Water/LawsRegulationsGuidance/Guidance/WaterPermitGuidance.aspx.

Contact information:
Please contact Burt Tuxford, Office of VPDES Permits, at (804) 698-4086 or burton.tuxford@deq.virginia.gov with any questions regarding the application of this guidance.

Disclaimer:
This document is provided as guidance and, as such, sets forth standard operating procedures for the agency. However, it does not mandate any particular method nor does it prohibit any particular method for the analysis of data, establishment of a wasteload allocation, or establishment of a permit limit. If alternative proposals are made, such proposals should be reviewed and accepted or denied based on their technical adequacy and compliance with appropriate laws and regulations.
Implementation Guidance for the Reissuance of the General VPDES Permit for Discharges From Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests, VAG83

1. Introduction
On September 27, 2012, the State Water Control Board adopted amendments to the General VPDES Permit Regulation for Discharges from Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests, 9VAC25-120. The regulation and general permit (VAG83) become effective on February 26, 2013, and will expire on February 25, 2018.

One significant change for this reissuance is the inclusion of a provision that allows specified short term projects (14 days or less in duration) and hydrostatic test discharges to be automatically covered under the permit without the requirement to submit a registration statement. The owner is authorized to discharge under the permit immediately upon the permit's effective date, and must notify the Department within 14 days of the discharge's completion. These discharges are subject to the same effluent limitations in the permit as other similar discharges.

This guidance is intended to aid regional permit writers and petroleum program case managers with the management of sites to be covered under this permit. This guidance document contains example letters that staff may use for the administration of the regulation, along with forms that permittees may use to request termination of coverage and transfer of ownership.

The adopted regulation and general permit fact sheet are not included in the guidance, but are available on DEQNet at the following link: http://deqnet/documents/index.asp?path=%2Fdocs%2Fwater%2FWater%2Fpermit%2FVPDES%2FPermit%2FProgram%2FGeneral%2Fpermits/Petroleum%2DHydrostatic%2FTests.

The General Permit itself (in Word) and the Registration Statement form (in both Word and PDF) are also on DEQNet at this link, along with the above mentioned example letters, and the Termination of Coverage and Transfer of Ownership forms (all in Word).

This guidance replaces GM08-2006.

2. Changes to the Regulation and General Permit
The significant changes to the regulation and general permit are as follows:

Section 10 - Definitions. Added definitions for "Department or DEQ", "Director", and "Total Maximum Daily Load or TMDL".

Section 15 - Applicability of Incorporated References Based on the Dates that they Became Effective. Added this section to define the applicable date of EPA 40 CFR references used in the regulation.

Section 20 - Purpose. Added coverage under the permit for hydrostatic tests of water storage tanks and pipelines. These tests are similar in discharge characteristics to the permit's existing hydrostatic tests, and were requested to be added to the permit coverage.

Section 60 - Authorization to Discharge. Modified this section to be consistent with the way this section is now being written for all general permits.

Section 60 - Authorization to Discharge, Subsection B. Added two reasons why a facility's discharge would not be eligible for coverage under the permit: (1) if the discharge violates or would violate the antidegradation policy in the Water Quality Standards at 9VAC25-260-30, and (2) if the discharge is not consistent with the assumptions and requirements of an approved TMDL. These restrictions on coverage are being added to all general permits as they are reissued.

Section 60 - Authorization to Discharge, Subsection D. Added language to allow for administrative continuance of coverage under the expiring general permit until the new permit is issued by the Board, and coverage is either granted or denied. The permittee must submit a timely and complete registration statement prior to the expiration date of the existing permit, and be in compliance with the terms of the expiring permit in order to qualify for continuance. This language is being added to all general permits as they are reissued so permittees can discharge legally and safely if the permit reissuance process is delayed.
Section 70 - Registration Statement, Subsections A and C. Modified these sections to be consistent with the way these are now being written for all general permits.

Section 70 - Registration Statement, Subsection B. Added a provision that allows specified short term projects (14 days or less in duration) and hydrostatic test discharges to be automatically covered under the permit without the requirement to submit a registration statement. Short term projects include: emergency repairs; dewatering projects; utility work and repairs in areas of known contamination; tank placement or removal in areas of known contamination; pilot studies or pilot tests, including aquifer tests; and new well construction discharges of groundwater. The owner is authorized to discharge under the permit immediately upon the permit's effective date, and must notify the Department within 14 days of the discharge's completion.

These discharges are subject to the same effluent limitations in the permit as other similar discharges. The minimal paperwork involved will allow these projects to proceed quickly, and will free up both owner and DEQ staff resources, while still protecting the environment.

Section 70 - Registration Statement, Subsection D - Late Registration Statements. Modified this section to clarify the late registration statement provision and to more clearly define when an owner qualifies for "administrative continuance" of the general permit coverage.

Section 80 - General Permit, Part I A. Added an effluent limitations section for short term projects. Effluent limits for short term projects correspond to the type of contamination at the project site and are given in Tables A 2 through A 5 of the permit. The sampling frequency for these projects is set at once per project term. **DMRs for short term projects are not required to be submitted** to the Department, but have to be retained by the owner for a period of at least three years from the completion date of the project. Blank DMR forms for the permittee's use will be posted on the DEQ external web site in the VPDES section.

Owners have to notify the Regional Office in writing within 14 days of the completion of the project discharge. The notification must include the owner's name and address, the type of discharge that occurred, the physical location of the project work, and the receiving stream. If the discharge is to an MS4, the owner also has to notify the MS4 owner within 14 days of the completion of the discharge.

Section 80 - General Permit, Part I A. Consolidated the Part I A Effluent Limitations and Monitoring Requirements for "Gasoline Contaminated Discharges" into one limits table, and for all receiving waters, and the discharges "Contaminated by Petroleum Products Other Than Gasoline" into one limits table, and for all receiving waters. Recalculated the effluent limits in the combined tables to be at the most protective levels for the discharge type and to protect all receiving waters based on an analysis of water quality criteria, toxicity data and best professional judgment. A review of existing permittee effluent monitoring data for the existing single limits tables show that permittees are currently meeting the proposed limitations with the treatment technology that is presently utilized.

Section 80 - General Permit, Part I, Table 2, 3, 4 & 5. Changed the flow reporting units from MGD to GPD to reflect the smaller flows that typically are measured at these facilities.

Section 80 - General Permit, Part I, Table 2, Footnote 2. Added test method information for ethylene dibromide (EDB) in discharges to public water supplies, which had been mistakenly omitted.

Section 80 - General Permit, Part I, Table 2, Footnote 3. Added EPA SW 846 Method 8015C (2000) to the list of acceptable methods for analyzing ethanol.

Section 80 - General Permit, Part I, Table 3, Footnote 2, and Table 4, Footnote 1. Added EPA SW 846 Method 8015C (2000) to the list of acceptable methods for analyzing TPH.

Section 80 - General Permit, Part I, Table 4, Footnote 3. Based on public comment, clarified that the chlorine monitoring and limit only apply where chlorinated water is used for the hydrostatic test.

Section 80 - General Permit, Part I, Table 4 - Hydrostatic Test Waters Discharges. Added a requirement that the equipment being tested must be substantially free of debris, raw material, product, or other residual materials, and that the discharge flow has to be controlled in such a manner
that prevents flooding, erosion, or excessive sediment influx into the receiving water body.

**DMRs for hydrostatic test discharges are not required to be submitted** to the Department, but have to be retained by the owner for a period of at least three years from the completion date of the hydrostatic test. Also, owners have to notify the Regional Office in writing within 14 days of the completion of the hydrostatic test discharge, and the notification must include the owner's name and address, the type of hydrostatic test that occurred, the physical location of the test work, and the receiving stream. Blank DMR forms for the permittee's use will be posted on the DEQ external web site in the VPDES section.

**Section 80 - General Permit, Part I B - Special Conditions.** Added permit special conditions as follows:

- **Special Condition #6.** Added a requirement for the permittee to submit discharge monitoring reports to both the Department and the owner of the municipal storm sewer system (MS4) if they discharge to the MS4. This was added to the existing special condition at the request of the TAC to inform the MS4 owner of exactly what is being discharged to their system since MS4 owners are ultimately responsible for the discharges from the MS4.

- **Special Condition #7.** Requires the permittee to report monitoring results using the same number of significant digits as listed in the permit. This requirement spells out the number of significant digits that the permittee must use when reporting monitoring results to the Department, and is being added as necessary to all general permits as they are reissued.

- **Special Condition #8.** Requires the permittee to control discharges as necessary to meet water quality standards. This requirement was requested to be added by EPA to another recently reissued general permit, and is being added to all general permits as they are reissued.

- **Special Condition #9.** Coverage under this general permit does not relieve the permittee of the responsibility to comply with any other federal, state or local statute, ordinance or regulation. This special condition is already in the regulation "Authorization to Discharge" section, but staff felt it should be repeated in the permit itself to remind the permittee of the responsibility.

- **Special Condition #10.** Requires the permittee to implement measures and controls consistent with a TMDL requirement when the facility is subject to an approved TMDL. This special condition language was developed by DEQ TMDL and VPDES Permits staff, and is being inserted into all general permits as they are reissued. The condition was developed since general permit discharges are considered insignificant to the overall TMDL waste load allocation. This special condition allows staff more flexibility to allow permit coverage for discharges without requiring immediate modification of the TMDL. DEQ will track the general permit discharges and once they become significant, the TMDL will be modified to include the load.

**Section 80 - General Permit, Part II A - Monitoring.** Added clarification that samples taken as required by the permit must be analyzed in accordance with 1VAC30-45, Certification for Noncommercial Environmental Laboratories, or 1VAC30-46, Accreditation for Commercial Environmental Laboratories.

**Section 80 - General Permit, Part II M - Duty to Reapply.** Changed the deadline to reapply for permit coverage from 180 days to 30 days to be consistent with the requirements in Section 70 C (Registration Statement).

**Section 80 - General Permit, Part II Y - Transfer of Permits.** Modified subsection 2a to allow the notification to the Department to be sent within 30 days of the transfer of the title, to be consistent with the way this is being changed in all general permits.

**3. Activities Covered by this General Permit**

This general permit covers point source discharges of petroleum or chlorinated hydrocarbon contaminated water from a variety of activities including excavation dewatering, purging groundwater monitoring wells, aquifer testing to characterize site conditions, groundwater pumping, and other cleanup activities approved by DEQ. This permit also can be used to cover the hydrostatic testing of petroleum and natural
gas storage tanks, petroleum and natural gas pipelines, underground and above ground storage tanks, and, new for this reissuance, water storage tanks and pipelines. The limits of this permit are intended to address discharges of petroleum contaminated water, discharges of hydrostatic test water, and discharges of chlorinated hydrocarbon contaminated wastewater. Additional information about the permit effluent limits may be found in the General Permit Fact Sheet. Discharges not associated with petroleum or chlorinated hydrocarbon contaminated water or hydrostatic tests are not authorized under this permit.

4. Registration Statement Review

a. Short Term Projects and Hydrostatic Tests
A major change for this permit reissuance is that not everyone that is authorized to discharge under this permit is required to submit a registration statement for permit coverage. Permit coverage is automatic, without the need to submit a registration statement, for the following types of discharges:

1. Short term projects (14 days or less in duration) including:
   a. Emergency repairs;
   b. Dewatering projects;
   c. Utility work and repairs in areas of known contamination;
   d. Tank placement or removal in areas of known contamination;
   e. Pilot studies or pilot tests, including aquifer tests; and
   f. New well construction discharges of groundwater;

2. Hydrostatic testing of petroleum and natural gas storage tanks and pipelines; and

3. Hydrostatic testing of water storage tanks and pipelines.

Since this is new for this permit reissuance, owners of short term projects and hydrostatic tests may still submit registration statements to the regional office. Permit staff should contact the owner and explain that these projects are automatically covered and no registration is required. The owner still has to meet permit requirements, effluent limitations and collect samples, but DMRs are not required to be submitted from these projects. Blank DMR forms will be posted for the permittee's use on the DEQ external web site in the VPDES section.

The owner needs to notify the Department within 14 days of the discharge's completion, and include the owner's name and address, the type of discharge that occurred, the physical location of the discharge work, and the receiving stream. If the discharge is to an MS4, the owner has to also notify the MS4 owner within 14 days of the completion of the discharge.

b. Registration For All Other Projects
All other persons seeking coverage under this permit must submit a registration statement to the appropriate DEQ regional office. There is no application fee to apply for coverage under this permit. The Registration Statement form and instructions are not included with this guidance, but are available on DEQNet (see the link in Section 1 above).

The registration statement requirements have changed only slightly for this reissuance. The changes are as follows:

1. Asked for the email address (if available) for both the facility and the owner;
2. Added "chlorinated hydrocarbon solvents" to question #5, which asks the permittee to list the products that caused the contamination;
3. Modified question #9, which has the permittee identify the discharge point and the waterbody of the discharge, by adding that for linear projects, the permittee has to identify the location of all the proposed discharge points along the project length and the associated waterbody for each discharge point;
4. For item #15, specified that the map has to be a USGS 7.5 minute topo, or other equivalent computer generated map; and
5. Added a question as to whether the facility will discharge to an MS4. If so, the permittee needs to give the name of the MS4 owner, and notify the MS4 owner in writing of the existence of the
discharge within 30 days of coverage under the general permit. The permittee must also copy the DEQ regional office with the notification, which has to include the name of the facility, a contact person and phone number, the location of the discharge, the nature of the discharge, and the facility’s VPDES general permit registration number.

Attachment 1 to this guidance contains an example transmittal letter that may be sent, along with the Registration Statement form and instructions, to prospective permittees. Staff may modify this transmittal letter as needed, however, the required elements should be included in each transmittal letter.

The Regional Water Permits, Remediation, and Waste Permits staff should collaborate and coordinate the VAG83 permit processing, CEDS data management, and file management tasks.

Regional staff will review registration statements submitted by applicants to determine if coverage may be granted under this permit. The evaluation checklist (see Attachment 4) can be used to determine if the discharge qualifies for coverage. Staff should consider the guidelines discussed below when reviewing registration statements.

Once a permitting determination has been made, the regional staff should either issue permit coverage, or respond to the applicant that the discharge does not qualify for coverage.

Treatment processes involving chlorinated hydrocarbon solvents may generate hazardous wastes. Such scenarios should be communicated to the Waste Permits staff to facilitate coordination of potential Waste regulatory requirements that may extend beyond the VAG83 general permit coverage. The Regional staff (the Remediation and/or the Water Permits staff) may also need the assistance of the Hazardous Waste - RCRA Subtitle C staff, or the VRP staff in the review of some registration statements before coverage is granted.

c. Registration Review Guidelines:

Questions 1 – 3, Facility and Owner Information
These questions provide information about the applicant and the discharge location. Addresses and phone numbers are needed for both the facility where the discharge will take place and the owner of that facility if their address is different than the location at which the discharge will take place. The E911 Address should be provided for the owner, not just a PO Box. We request the email address be provided where available.

Question 4, Nature of the Business Conducted at the Facility
The applicant should briefly describe the type of business that usually is conducted at the facility where the discharge will take place.

Question 5, Type of Contamination
Effluent limits are based upon the type(s) of material(s) that contaminated the water at the site. For this reissuance, the effluent limits tables are no longer broken down by receiving stream type (fresh or saltwater), but now include in one table the limits to protect water quality for all receiving waters. Where the water was contaminated by petroleum products, the applicant needs to indicate the types of petroleum products contributing to the water contamination (e.g., gasoline, diesel, #4 fuel oil). If the water was contaminated by chlorinated hydrocarbons, not petroleum products, the applicant must indicate the types of chlorinated hydrocarbons present in the water.

Question 6, Proposed Discharge Activities
Since short term projects are not required to submit a registration statement, the list of potential sources of wastewater discharges at the site has been reduced considerably for this reissuance.

The applicant should identify all of the potential sources of wastewater discharges at the site. Since each activity is considered a separate outfall, it is important to identify them individually when the permit coverage is requested. Otherwise, the permittee will have to re-submit the registration statement in order to obtain coverage for activities not listed on the original registration statement. For example, if discharges will occur from both an aquifer pump test and the long-term recovery of groundwater as part of remediation system, then both of these activities should be checked on the
registration statement. Permit writers also may confirm the activities listed on the registration statement with the applicant prior to processing the registration statement.

**Question 7. Site Characterization Report**
This question is specifically for petroleum contaminated sites, and asks if a Site Characterization Report (SCR) has been submitted for the site. The SCR provides a cross reference to potential ongoing remedial actions at the site. If an SCR has been submitted, the permit writer may wish to review the SCR before processing the registration statement to ensure that the permit coverage requested is likely to address all of the anticipated discharge activities at the site.

**Question 8. Characterization or Nature of Wastewater Contamination Including Analytical Data**
Applicants for this general permit need to inform DEQ of the type of discharge that will take place and the contaminants present in the wastewater. Persons having discharges of petroleum-contaminated wastewater need to inform staff of the type(s) of petroleum product(s) to be discharged so that the appropriate effluent limits may be assigned to the discharge. If the water has been contaminated by used oil, the applicant should provide analytical data for dissolved volatile organic compounds, semi-volatile organic compounds, and metals. If the discharge involves chlorinated hydrocarbons, the applicant should provide analytical data showing the constituents present in the raw wastewater (i.e., untreated wastewater). If chlorinated hydrocarbons other than, or in addition to, those having effluent limits listed in this permit regulation are present in the raw wastewater, staff should not use this general permit to authorize the discharge.

Petroleum contaminated discharges are usually supported by a site characterization (analytical data) required by the UST Technical Regulation, or a Phase 2 Environmental Assessment required by a real estate transfer. For discharges contaminated by chlorinated hydrocarbon solvents, there is no one regulation in place to assure the routine availability of a site characterization. There are various laws and regulations in place such as CERCLA, RCRA, and the Virginia VRP program that may enable a site characterization to be available for a site proposing a solvent discharge. When inadequate information is submitted by an applicant for a proposed solvent discharge, the staff may need to direct the applicant to other remediation programs for site characterization and cleanup, if appropriate.

If the situation is such that there is no program in place to oversee a site characterization and cleanup, staff may have to rely on the analytical data provided, or may have to request additional analytical data to that which is provided with the registration statement. Staff may request that the applicant submit additional analytical data, but there is no regulation that would require more sampling if the applicant refuses.

For example, if we receive a request for general permit coverage where the site has solvents, and the justification is based on one sample located very far from the probable source, we can request that the applicant provide appropriate sampling data. If the applicant does not agree to do this, then staff would have to decide if the data submitted was sufficient to justify issuing the general permit coverage. If not, then we would deny general permit coverage.

The basis we could use to deny general permit coverage would be: (1) if inadequate information was submitted to determine if coverage under the permit is appropriate; or (2) the presence of constituents in the discharge which are not authorized under the general permit (e.g., acetone).

**Question 9. Discharge Location**
This question requires the applicant to provide information about the discharge location. For this reissuance, owners proposing coverage for linear projects must identify the location of all the proposed discharge points along the project length and the associated waterbody for each discharge point.

The permit writer should consult the Water Quality Standards 9VAC25-260-390 through 9VAC25-260-540 to determine if the receiving water is listed as a PWS. Discharges within five miles upstream of a PWS intake are not authorized by this permit. (For tidal intakes, discharges within five miles of the PWS intake -- upstream or downstream -- are not authorized by this permit.)

There are other waters listed in the Water Quality Standards (9VAC25-260-310) that have
restrictions/prohibitions on discharges. This section should be reviewed prior to issuing permit coverage.

Questions 10-13. Discharge Information
The answers to these questions provide information about the expected frequency, volume, flow rate, and duration of the discharge.

Question 14, Diagram of the Proposed Wastewater Treatment System
There are no specific requirements for the system diagram. The diagram of the system may be as simple as a line drawing or flowchart or it may be detailed engineering plans. In all cases, enough information must be provided to allow the permit writer to determine if the proposed system is likely to treat the wastewater to the point that the effluent can meet the discharge limits. If the permit writer believes that the information is insufficient or the treatment system is unlikely to produce an effluent that can meet the permit limits, permit coverage should be denied.

Question 15, Topographic Map
This map will help the permit writer to determine the potential for adverse impact to public water supplies or other protected water bodies. For this reissuance, we specify that the map should be a USGS 7.5 minute topographic map or other equivalent computer generated map.

Question 16, Discharges to Municipal Separate Storm Sewer Systems (MS4s)
For this reissuance, we ask the owner to indicate whether the facility will discharge to a municipal separate storm sewer system (MS4). If so, the applicant must provide the name of the MS4 owner. The permittee also has to notify the MS4 owner in writing of the existence of the discharge within 30 days of coverage under the general permit, and has to copy the Regional Office with the notification. The notification must include the following information: the name of the facility, a contact person and phone number, the location of the discharge, the nature of the discharge, and the facility's VPDES general permit registration number.

Question 17, Availability of a Central Wastewater Treatment Facility
This question asks if central wastewater treatment facilities are available and, if so, what is the possibility of discharging to the central wastewater treatment facility. Proposed discharges in locations that are not served by, or that do not have access to central sewer lines may be granted coverage under this permit. If a central sewer line is available but the operator of the wastewater treatment facility has denied the applicant access to the sewer, coverage may be granted under the permit.

Generally, persons having the option of discharging to a central wastewater treatment facility should send the effluent to the central wastewater treatment facility and not be issued coverage under this permit. The general permit should not be used as a means of encouraging a proliferation of surface water discharges. Permit writers need to be cognizant, however, that the costs associated with discharging petroleum-contaminated water may, at many sites, be reimbursable from the Virginia Petroleum Storage Tank Fund and DEQ has a responsibility to ensure that the Fund provides reimbursement for activities that are necessary for corrective action at the site. At those sites that are eligible for reimbursement from the Fund, staff may consider the relative costs associated with discharging to a central wastewater treatment facility versus the costs associated with the general permit and use the cost differential as a basis for justifying the issuance of coverage under the general permit.

Questions 18 and 19, Pollution Complaints and Permits at the Site
These questions are used to relate the proposed discharge to other activities under DEQ's oversight at the facility. If a facility already has an existing VPDES permit, consideration should be given to expanding the existing permit to include this proposed discharge.

Question 20, Hazardous Waste
This question asks if the discharged material may be classified as a hazardous waste. If the answer is "yes", the situation should be communicated to the Waste Permits staff to facilitate coordination of potential Waste regulatory requirements that may extend beyond the VAG83 general permit.
coverage.

Certification
The applicant must sign and date the certification section provided on the registration statement. All registration statements must be signed in accordance with the permit section Part II.K - Signatory Requirements.

There are many cases where a consultant has signed the registration statement, and this is okay. Unlike the tank regulations where only the tank owner and operator are the responsible persons (RP), the VPDES regulations apply to both the owner, operator and anyone who exercises control over the discharge from the treatment facility. The RP can be an operator of the treatment facility, but so can the consultant. If the consultant signs the registration statement, they are the one responsible for meeting the requirements of the permit.

Required Attachments
The following attachments should be included with the registration statement:

- Wastewater Characterization Analytical Data
- Treatment Works Design Schematic Drawing
- Topographic Map

DEQ Box For Stream Basin, Class, Section, and Special Standards Information
After the Required Attachments list, there is a box for DEQ use only. The permit writer should fill in information on stream basin, class, section, and special standards in order to ensure that discharges are not being allowed into waters where such discharges are prohibited.

5. Permit Processing Guidelines

a. Antibacksliding and Antidegradation
If the applicant previously held an individual permit at the site, antibacksliding must be considered prior to granting coverage under this general permit. Backsliding should be evaluated on a case-by-case basis in accordance with the VPDES Permit Regulation (9VAC25-31-220 L).

In the case of new or increased discharges at a facility already covered by the general permit, a determination has already been made that such discharges will not result in significant effects to receiving waters. Therefore, permit writers do not have to conduct a case-by-case antidegradation review for new or increased discharges.

b. General Permit Pages and Transmittal Letter
Once it is determined that the registration statement represents a facility that qualifies for coverage, the general permit pages may be prepared. The general permit pages are not included with this guidance, but are available on DEQNet (see the link in Section 1 above).

The cover page, printed on agency letterhead, appropriate Part I.A effluent limits pages (make sure all the outfalls are covered), Part I.B special conditions, and Part II permit boilerplate should be assembled. Please note that the permit registration number must be added to the permit pages, including the cover page, before the permit is mailed to the permittee. For existing permitted facilities, the registration number will be the same one that was used for the previous issuance. For new facilities, the registration number will be generated by CEDS when the facility is entered into the system.

The appropriate outfall number(s) must be added at the end of the first sentence on each Part I.A effluent limits page. Each discharge activity proposed for the site should be assigned a separate outfall number so that the Discharge Monitoring Reports (DMRs) can be properly developed. More than one outfall number may be listed on the applicable limitations page. Remember to do a final Part I page count and correct the Part I page numbers if necessary. The pages of Part II are already numbered. No other changes to the language of the general permit are authorized.

Once the DMRs are ready (see section 5c below), staff should send a transmittal letter, the DMRs, and a copy of the permit to the permittee. Staff should keep a copy of these documents in ECM for
the regional file. Do not copy DEQ Central Office or EPA on individual coverage issued under the general permit. An example transmittal letter that staff may use is attached. Staff may modify the transmittal letter as needed to address site conditions. A list of items that need to be addressed in all transmittal letters is included in Attachment 1.

Permit writers should note that the transmittal letter for coverage under a general permit does not contain the two paragraphs referencing the owner's right to appeal the decision to cover them under the permit.

d. DMRs and Reporting Requirements
The DMR requirements have not changed for this reissuance. The general permit still requires 1/month, 2/month, and (potentially) 1/quarter monitoring, and monthly reporting. DMRs are necessary for reporting and compliance tracking. All outfalls described in the registration statement should be listed on the effluent limits page and on a DMR, so that there is an indication in the permit of what outfalls require sampling. Each outfall is required to have a separate DMR.

DMRs should be generated using CEDS, and should include the applicable limitations and monitoring requirements that reflect the Part I A page(s) assigned to each outfall. If the contamination at the site involves leaded gasoline, then the DMR must include lead, hardness, ethylene dibromide, and 1,2 dichloroethane. Otherwise, these parameters should be deleted from the CEDS limits page. If gasoline containing greater than ten percent ethanol contributed to contamination at the site, then the DMR must include ethanol. Otherwise, it should be deleted from the CEDS limits page. Staff should be aware that discharges to surface waters listed as public water supply sources have different effluent limits than surface waters not listed as public water supply sources.

Constituents listed on DMRs for water contaminated by petroleum products other than gasoline also vary depending upon whether the receiving stream is listed as a public water supply. Methyl tertiary butyl ether (MTBE) and benzene must be on these DMRs when the water will be discharged to a listed public water supply source.

For registered permittees, DMRs must be submitted monthly, regardless of whether the facility has a discharge or not. DMRs are due on the tenth of the month following the monitoring period. Tracking of compliance with the limits and other requirements of the general permit should be done according to the Compliance Auditing System already established for VPDES Permits. Reporting requirements for noncompliance, unusual or extraordinary discharges, etc. are the same as for an individual permit.

**DMRs for short term projects and hydrostatic tests are not required to be submitted** to the Department, but have to be retained by the owner for a period of at least three years from the completion date of the project. Blank DMR forms for the permittee's use will be posted on the DEQ external web site in the VPDES section.

Electronic DMR (eDMR) reporting is not available yet for this general permit. If/when this option becomes available, we will send an information package to the registered permittees inviting them to participate in the program.

d. Reduced Monitoring
Permittees with petroleum or chlorinated hydrocarbon contaminated discharges to waters listed as public water supply sources may qualify for reduced monitoring. For the first year of permit coverage, these permittees must monitor the effluent twice per month. After the first year of coverage (twelve DMR submittals), if the first year monitoring results demonstrate full compliance with the effluent limitations, the permittee may request that the monitoring frequency be reduced to once per month. The written request should be sent to the appropriate regional office for review. This request should be granted only when there have been no effluent limit violations from this discharge. The regional office should send written notification of the approval or denial of the request. If the request is approved, the approval letter should be accompanied by revised DMRs, and CEDS should be updated to reflect the reduced sampling frequencies.

Should the permittee be issued a warning letter related to violation of effluent limitations, a notice of
violation, or be the subject of an active enforcement action, the monitoring frequency for all
parameters will revert back to twice per month upon issuance of the letter or notice or initiation of the
enforcement action, and will remain in effect until the permit's expiration date. If this happens, the
regional office should send written notification to the permittee, the letter should be accompanied by
revised DMRs, and CEDS should be updated to reflect the twice per month sampling frequencies.

Permittees monitoring for ethanol may also qualify for reduced monitoring. For the first year of
permit coverage, these permittees must monitor the effluent either once per month or twice per month
(depending on where they discharge). After the first year of coverage (twelve DMR submittals), if
the first year monitoring results demonstrate full compliance with the effluent limitations, the
permittee may request that the monitoring frequency be reduced to once per quarter. The written
request should be sent to the appropriate regional office for review. This request should be granted
only when there have been no effluent limit violations from this discharge. The regional office
should send written notification of the approval or denial of the request. If the request is approved,
the approval letter should be accompanied by revised DMRs, and CEDS should be updated to reflect
the reduced sampling frequencies.

Should the permittee be issued a warning letter related to violation of effluent limitations, a notice of
violation, or be the subject of an active enforcement action, the monitoring frequency for all
parameters will revert back to the original permit monitoring frequency upon issuance of the letter or
notice or initiation of the enforcement action, and will remain in effect until the permit's expiration
date. If this happens, the regional office should send written notification to the permittee, the letter
should be accompanied by revised DMRs, and CEDS should be updated to reflect the original
sampling frequencies.

e. Permit Tracking - CEDS and ECM

Tracking of coverage under this general permit will be performed in CEDS, and CEDS has been
modified to reflect the revised effluent limits pages. Note that short term projects and hydrostatic test
facilities are not required to submit a registration statement, and are not going to be tracked in CEDS.

It is important that the CEDS database be kept up-to-date with the list of permittees and contact
information, their registration numbers, and the effluent limits pages that are applicable to each
permittee. Specific CEDS information on the Petroleum GP is contained in the CEDS Petroleum
%5F2007

ECM records for registered discharges covered under this permit should contain a copy of the
registration statement, general permit and DMRs sent to the owner, transmittal letter, and any
inspection reports. For short term projects and hydrostatic tests, the only information we will receive
will be the facility notifications of completed projects. We will not have a permit registration number
for these, so the project completion notifications should be entered into ECM using the procedure for
facilities without a permit number.

f. Termination of Coverage For Some or All Activities

The permit allows the permittee to request termination of coverage for some or all of the activities
identified on the registration statement. Termination of coverage for activities that no longer
discharge to the environment will relieve the permittee of the responsibility for filing DMRs for those
outfalls associated with those activities.

The termination request for inactive outfalls should be processed as a minor modification of the
permit. The Regional Office should send a confirmation to the permittee that the request to terminate
coverage for specific outfalls has been granted. A copy of that confirmation should be sent to the
Compliance Auditor, so that the reporting requirement for that outfall can be deleted from the
tracking system. The information in CEDS should be updated to reflect this change in status, and a
comment entered into the Comments field at the bottom of the General Information tab stating what
was changed and the date it was changed. A form that permittees may use to request termination of
coverage for either individual outfalls or all discharges is included as Attachment 2 to this guidance,
and is also on DEQ's external web site and on DEQNet.

Permittees who wish to add outfalls for activities not identified on the original registration statement should file amended registration statements and be issued new DMRs for the new outfalls. These new outfalls should be recorded in the compliance tracking system, and CEDS should be updated to reflect this change, and a comment entered into the Comments field at the bottom of the General Information tab stating what was changed and the date it was changed.

g. Change of Ownership
If there is a request for a change of ownership, then the new owner assumes the coverage under the general permit and the permit registration number does not change. The new owner may submit a new registration statement, but it is not necessary. For this reissuance, Part II Y of the permit has been modified to say that the automatic transfer of ownership can occur if the current permittee notifies the Department within 30 days of the transfer of the title to the facility or property, and the required written agreement between the new and old owners is provided. The other change of ownership requirements and procedures from the VPDES Permit Regulation and the VPDES Permit Manual that are common to all VPDES permits apply here as well. A change of ownership form that may be used to transfer permit coverage from one entity to another is included as Attachment 3 to this guidance, and is also on DEQNet.

CEDS must be updated for any change of ownership, and a comment entered into the Comments field at the bottom of the General Information tab stating the ownership change and the date of the change.

h. Inspection Strategy
Facilities covered under this general permit are subject to the inspection strategy in the industrial minor/small category. Registered facilities should be inspected at least once every five years. Typically these inspections are done by the regional Tanks staff, but it is a regional decision as to whether Water inspectors or Waste inspectors take the lead on these inspections.

The inspectors should check for compliance with the technical aspects of the permit, including but not limited to the presence of an O&M manual, and for overflows, by-passes, and other indications of a failed system. Also, the inspector should review the DMR data to determine whether the permittee has been submitting representative data in accordance with the monitoring, analytical and reporting requirements of the general permit.

For short term projects and hydrostatic tests, the only time we should need to inspect these facilities is if there is a problem identified that is associated with the discharge. If we do inspect these projects, the inspector should review the DMR data to determine whether the permittee has been monitoring in accordance with the requirements of the general permit.

i. Reapplication
For this reissuance, the reapplication requirement in Part II M of the permit has been changed to match the Registration Statement section of the regulation (9VAC25-120-70 C). Registered permittees need to submit a new registration statement at least 30 days prior to the expiration of the general permit if continued coverage is desired. Since this date will be the same for all those covered by the permit, any reminder letters sent out would be a mass mailing of some kind. DEQ Central Office Water Permits staff will provide further guidance when the permit nears expiration.

Attachments:
1. Letter Requirements and Example Letters
2. Termination of Coverage Request
3. Transfer of Ownership Agreement
4. Registration Statement Evaluation Checklist
LETTER REQUIREMENTS AND EXAMPLE LETTERS

GENERAL VPDES PERMIT FOR DISCHARGES FROM PETROLEUM CONTAMINATED SITES, GROUNDWATER REMEDIATION, AND HYDROSTATIC TESTS (VAG83)
Example Letter:

*Letter requesting the RP to obtain coverage under General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83)*

Date

Addressee

re: Site Name/Location:
Facility and Tank Identification (if applicable):
DEQ Tracking Number: PC# (if applicable)

Dear _____:

Information presented to or known by Department of Environmental Quality (DEQ) staff indicates that one or more activities planned for the referenced site may cause a [pick one: discharge of petroleum contaminated water into surface water, discharge of chlorinated hydrocarbon contaminated water into surface water]. In order to ensure the protection of human health and the environment, DEQ believes that these activities need to be covered under the General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83) (staff may, at their discretion, list specific activities that they believe need to be permitted).

Please complete the enclosed General VPDES Permit Registration Statement form and return it to this office by [date]. The Registration Statement form and instructions for completing the registration statement are enclosed.

If you have any questions, please feel free to call me at [phone number].

Very truly yours,

DEQ Case Manager

enclosures

General VPDES Permit Regulation for Discharges From Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (9VAC25-120)
Registration Statement Form and Instructions

(revised 02/11/13)
Requirements for Transmittal Letter
General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83)

- Identify the Permit #.
- List the site name and address.
- List the PC# (if applicable).
- The effective date of coverage under the permit is the date of the transmittal letter.
- Remind the permittee that they are required to submit DMRs on a monthly basis for each outfall.
- Inform the permittee that copies of the DMRs are enclosed and the permittee is responsible for making additional copies of the DMRs.
- Instruct the permittee where to send DMRs.
- Remind the permittee that they must develop and maintain an O&M Manual at the site if they will treat or store wastewater prior to discharge.
- Inform the permittee that if they wish to terminate permit coverage for inactive outfalls, or for the entire site, they should fill out the enclosed Termination of Coverage Request form and send it to the Case Manager.
- Signatory Requirements - The letter should be signed by the appropriate Regional Program Manager.

- Enclosures:
  Discharge Monitoring Report(s)
  Permit Cover Page
  Applicable Effluent Limitations and Monitoring Requirements (Part I.A pages)
  Parts I.B and II of the Permit
  Termination of Coverage Request form

(revised 02/21/13)
Example Letter:

Transmittal Letter for General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83)

Date

Addressee

RE: Coverage under the General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests

VAG83 [fill in 4 digit tracking #]

[Site Name and Address]

[PC# (if applicable)]

Dear [Name]:

We have reviewed your registration statement received on [date] and determined that the [discharge(s)] outlined on that statement [is/are] hereby covered under the referenced general VPDES permit. The effective date of your coverage under this general permit is the date of this letter. The enclosed copy of the general permit contains the applicable effluent limitations, monitoring requirements and other conditions of coverage.

The permit requires effluent sampling on a [pick one: monthly, semi-monthly] basis and reporting on a monthly basis. Discharge Monitoring Reports (DMRs) that you may use to report sampling results are enclosed. You are responsible for making additional copies of the DMR(s) as needed. Separate DMRs must be completed for each permitted outfall and DMRs must be submitted for each outfall regardless of whether a discharge from that outfall occurred during the previous month. If a discharge did not occur from a particular outfall during the previous month, please write "no discharge" on the DMR. You are required to submit completed DMRs by the 10th of each month to:

[Compliance Auditor]
[Regional Office Address]

[Insert the following paragraph if wastewater will be treated or stored prior to discharge]

Information provided on the registration statement indicates that wastewater will be discharged through a treatment works. Within 30 days of the date of this letter, you are required to develop and maintain on site an Operation and Maintenance (O&M) Manual for this permitted treatment works (see Part I.B.3 of the Permit).

This general permit will expire on February 25, 2018. The conditions of the permit require that you submit a new registration statement at least 30 days prior to the date of permit expiration if you wish to continue coverage under the permit.

If you wish to terminate permit coverage for inactive outfalls, or for the entire site, please fill out the enclosed Termination of Coverage Request form and send it to [Case Manager] at the address listed above.

Please review the enclosed materials carefully. If you have any questions, please call [Case Manager] at [phone number].

Very truly yours,

[Regional Program Manager]

Enclosures: Discharge Monitoring Report(s)
Permit Cover Page
Applicable Effluent Limitations and Monitoring Requirements (Part I.A pages)
Parts I.B and II of the Permit
Termination of Coverage Request Form

(revised 02/21/13)
Requirements for Termination of Coverage Letter
General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83)

- List the Permit #.
- Identify the site name and location.
- List the PC# (if applicable).
- Identify whether coverage is being terminated for the entire site or for specific outfalls. If specific outfalls are being terminated, it is recommended that you list each outfall that is being terminated by both outfall number and description (e.g., outfall 003 - pump test).
- Signatory Authority - The letter must be signed by the appropriate Regional Program Manager.

(revised 02/27/13)
Example Letter

Termination of Coverage Under the General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests

Date

Addressee

RE: Coverage under the General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation and Hydrostatic Tests

VAG83 fill in 4 digit tracking #

Site Name and Address

PC# (if applicable)

Dear _____:

Thank you for submitting a request to terminate coverage under the referenced permit. We have reviewed your request and coverage under the referenced permit is hereby terminated for: [fill in information from A or B below]

[A. all surface water discharges at the referenced site]

[B. the following outfalls

1. outfall # outfall description (e.g. tank pit dewatering)

2. outfall # outfall description]

Termination will become effective 30 days from the date of this notification unless you provide an objection in accordance with one of the two paragraphs below. Discharges from the activities listed above will no longer be authorized under the general permit. Please note that submittal of the Termination of Coverage Request does not release you from liability for possible past violations of the general permit.

As provided by Rule 2A:2 of the Supreme Court of Virginia, you have thirty days from the date of service (the date you actually received this decision or the date it was mailed to you, whichever occurred first) within which to appeal this decision by filing a notice of appeal in accordance with the Rules of the Supreme Court of Virginia with the Director of the Virginia Department of Environmental Quality. In the event that this decision is served on you by mail, three days are added to that period.

Alternatively, any owner under §§ 62.1-44.16, 62.1-44.17 and 62.1-44.19 of the State Water Control Law aggrieved by any action of the State Water Control Board taken without a formal hearing, or by inaction of the Board, may demand in writing a formal hearing of such owner's grievance, provided a petition requesting such hearing is filed with the Board. Said request must meet the requirements set forth in 9VAC25-230-130 (Procedural Rule No. 1 – Petition for Formal Hearing). In cases involving actions of the Board, such petition must be filed within 30 days after notice of such action is mailed to such owner by certified mail.

If you have any questions, please call [Case Manager] at [phone number].

Very truly yours,

[Regional Program Manager]

(revised 02/27/13)
Attachment 2

TERMINATION OF COVERAGE REQUEST

GENERAL VPDES PERMIT FOR DISCHARGES FROM PETROLEUM CONTAMINATED SITES, GROUNDWATER REMEDIATION, AND HYDROSTATIC TESTS (VAG83)
TERMINATION OF COVERAGE REQUEST

General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83)

Date: ______________

Attn: __________________________________________________

(fill in name of Regional Case Manager)

Permit Registration #: VAG83_______

Site Name: ________________________________________________

(please match facility name listed on the registration statement)

Please denote your termination of coverage request by placing an "x" in front of either request 1 or 2 below (do not place an "x" in front of both requests).

1. ____ I hereby request termination of coverage under the General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests for all discharges from the facility listed above.

2. ____ I hereby request termination of coverage under the General VPDES Permit for Discharges from Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests for the outfalls listed below:

<table>
<thead>
<tr>
<th>Outfall Number</th>
<th>Outfall Description</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Signature: __________________________________________ Date: __________

Print Name: __________________________________________

Title: __________________________________________

FOR DEQ USE ONLY
Termination request accepted / not accepted (please circle decision) by: ______________

Date: ____________________

(revised 02/11/13)
Attachment 3

TRANSFER OF OWNERSHIP AGREEMENT FORM

GENERAL VPDES PERMIT FOR DISCHARGES FROM PETROLEUM CONTAMINATED SITES, GROUNDWATER REMEDIATION, AND HYDROSTATIC TESTS (VAG83)
TRANSFER OF OWNERSHIP AGREEMENT FORM

General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83)

General VPDES Permit Registration Number:  VAG83 __________

Name of Permitted Facility:  ______________________________________________

Location (City/County):  ________________________________

We, the undersigned, hereby request a transfer of ownership for the referenced general permit.

Date of transfer:  ________________________________

CURRENT OWNER:  I (We) hereby agree to the transfer of ownership modification to the referenced General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83).

Current Owner Name:  _________________________________________________

*Signed:  ________________________________  Date:  __________________________

Printed Name:  ________________________________  Title:  _________________________

Address:  ______________________________________________________________

____________________________________________________

NEW OWNER:  I (We) hereby agree to the change of ownership modification to the referenced General VPDES Permit for Petroleum Contaminated Sites, Groundwater Remediation, and Hydrostatic Tests (VAG83), and agree to accept all conditions and responsibilities of the permit.

Transferred permit to be issued to:  _________________________________________

*Signed:  ________________________________  Date:  __________________________

Printed Name:  ________________________________  Title:  _________________________

Address:  ______________________________________________________________

____________________________________________________

* This form must be signed by properly authorized individuals as specified in the VPDES Petroleum General Permit (VAG83), Part II K (Signatory Requirements)

(revised 02/11/13)
REGISTRATION STATEMENT EVALUATION CHECKLIST

GENERAL VPDES PERMIT FOR DISCHARGES FROM PETROLEUM CONTAMINATED SITES, GROUNDWATER REMEDIATION, AND HYDROSTATIC TESTS (VAG83)
### Permit Application Checklist - VAG83

**Permit Registration # Issued:** VAG83

<table>
<thead>
<tr>
<th>FACILITY Name:</th>
<th>Registration Statement Received:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>Additional Information Requested:</td>
</tr>
<tr>
<td>Phone / Fax:</td>
<td>Additional Information Received:</td>
</tr>
<tr>
<td>E-Mail:</td>
<td>2nd Additional Information Requested:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>OWNER/RP Name:</th>
<th>Administratively Complete:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Address:</td>
<td>Technically Complete:</td>
</tr>
<tr>
<td>Phone / Fax:</td>
<td>Signed:</td>
</tr>
</tbody>
</table>

| 1st DMR Due: | 1st Monitoring Period: |

### Contamination:

- [ ] Petroleum
- [ ] Chlorinated Hydrocarbons
- [ ] Gasoline
- [ ] Other: __________________________

### YES / NO

- [ ] Proper analytical data of raw wastewater received? *(Data should correspond with the type of contamination checked above. Example: used oil includes VOCs, SVOCs & Metals; chlorinated hydrocarbons include all constituents present.)*
- [ ] Waterbody identified?
- [ ] Discharge frequency, volume and flow properly estimated? If no, circle missing/improper item.
- [ ] Proposed wastewater treatment system diagram received?
- [ ] O&M required? *(Required if the facility’s system does any type of storing or on-site cleaning / treating prior to discharging to state waters.)*
- [ ] Topographic or other map received with the following properly identified:
  - Receiving waterbody
  - Discharge point(s)
  - Property boundaries within ½ mile radius of proposed discharge:
    - [ ] Springs
    - [ ] Other surface waterbodies
    - [ ] Drinking wells
    - [ ] Public Water Supplies (PWS)
- [ ] PWS within 5 miles of proposed discharge? *(If within 5 miles, cannot issue a general permit.)*
- [ ] Central wastewater treatment facility availability properly assessed?
- [ ] Current permit issued by the Board? ________________
- [ ] PC #? ________________
- [ ] Hazardous waste?
- [ ] Proper signature?

### Effluent Limitations & Monitoring Requirements

- **# of Outfalls:** _____
- **Receiving Water:** Freshwater
- **Contamination by:** Gasoline
- **PWS:** [ ] Yes  [ ] No
- **List of other petroleum products:** __________________________
- **DMR Limit Set #:** 1

(revised 02/11/13)