

**COMMONWEALTH OF VIRGINIA
STATE WATER CONTROL BOARD**

**FACT SHEET
REISSUANCE OF A GENERAL VPDES PERMIT
FOR NONMETALLIC MINERAL MINING
2019 REISSUANCE
Revised June 2019**

The State Water Control Board (board) has authorized the reissuance of the Virginia Pollutant Discharge Elimination System (VPDES) general permit for point source discharges from nonmetallic mineral mining facilities. This general permit will replace VAG84, which expires June 30, 2019. Owners covered under the expiring general permit, who wish to continue to discharge under a general permit, must register for coverage under the new general permit.

Permit Number: VAG84

Name of Permittee: Any owner of a qualifying nonmetallic mineral mining facility with point source discharges that obtains coverage under the terms of this general permit.

Facility Location: Commonwealth of Virginia

Receiving Waters: Surface waters within the boundaries of the Commonwealth of Virginia, except those specifically named in board regulations that prohibit such discharges.
Discharge to surface waters may be through a municipal separate storm sewer system.

Based on preliminary review and application of lawful standards and regulations, the board has proposed to reissue the general permit subject to certain conditions and has prepared a general permit. The board has determined that this category of discharges is appropriately controlled under a general permit as it involves facilities with the same or similar types of operations that discharge the same or similar types of wastes. The general permit requires that all covered facilities meet standardized effluent limitations, conditions and monitoring requirements and that all covered facilities develop a site-specific stormwater pollution prevention plan.

The staff contact for questions or obtaining information about this general permit may be reached at:

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I. Activities Covered by This General Permit

The general permit will cover point source discharges associated with nonmetallic mineral mining operations classified in Standard Industrial Classification Major Group 14. The general permit will cover stormwater discharges for all qualifying facilities within this major group that have stormwater discharges only and, for specific SIC Codes, it will also provide coverage for process wastewater. Some of the Major Group 14 SIC codes or specific mining activities are excluded from the process wastewater coverage because the mining activities are subject to more stringent effluent limits under EPA effluent guidelines at 40 CFR Part 436. These facilities will require a separate, individual VPDES permit to discharge process wastewater.

Facilities for which the discharge of process wastewater is covered are those classified under SIC Codes 1411, 1422, 1423, 1429, 1442, 1455, 1459 except bentonite and magnesite mines, 1475 and 1499 except gypsum, graphite, asbestos, diatomite, jade, novaculite, wollastonite, tripoli and asphaltic mineral mining operations. For 2019, DEQ is including in the regulation North American Industry Classification Codes (NAICS) since these reflect the current classification system maintained by the federal government.

This general permit does not cover coal mining, metal mining, or oil and gas extraction.

Nonmetallic mineral mines may have other industrial activities co-located within the mine permit area. These activities may involve further processing of the mined material and discharges associated with them have characteristics similar to those of the mining operation. If the mineral mine is the primary industrial activity on the site and the characteristics of the wastewater from co-located industrial activities are similar to those of the mineral mine, the co-located activity discharges are also regulated under the general permit.

This permit does not allow discharge of process wastewater pollutants from co-located asphalt paving materials operations. For the purposes of this special condition, process wastewater pollutants are any pollutants present in water used in asphalt paving materials manufacturing which come into direct contact with any raw materials, intermediate product, by-product or product related to the asphalt paving materials manufacturing process.

No owner or operator of a mineral mine will be covered under the general permit until a mineral mining permit has been issued to the relevant facility by the Virginia Department of Mines, Minerals, and Energy, Division of Mineral Mining (DMM). In Virginia, mining activities that disturb the land surface and remove minerals at any site are required to have a mineral mining permit under the requirements of the Minerals Other Than Coal (MOTC) Surface Mining Law, Chapter 16, Title 45.1 of the Code of Virginia. The mineral mining permits are administered by DMM. The Surface Mining Law requires that no operator shall engage in mining without having first obtained from DMM an operating permit that covers the affected land. The exception to this requirement is for mineral mines owned and operated by governmental bodies, which are not required to have a mining permit, but will be eligible for coverage under VAG84. Mineral mining permits require the implementation of an erosion and sedimentation control plan as an enforceable part of the permit. The mineral mining permit application also requires the applicant to provide an acceptable mine reclamation plan that provides for adequate measures to prevent erosion and sedimentation from the reclaimed site. The mining permit and its requirements for erosion and sedimentation control are administered and enforced in such a manner as to provide protection of water quality and beneficial uses in the receiving waters from pollution caused by eroding material from mining activities. These requirements in the mineral mining permit satisfy many of the stormwater pollution prevention plan requirements of the general permit.

II. Effluent Limitations and Monitoring Requirements

The effluent limitations and monitoring requirements specified in the general permit are depicted in items A and B below.

A. Discharge of process wastewater and commingled stormwater runoff:

<u>Parameter</u>	<u>Limitation</u>
Flow	Report average and maximum
Total Suspended Solids	30 mg/L monthly average, 60 mg/L daily maximum
pH	6.0 minimum, 9.0 maximum ¹

Discharge Monitoring Reports (DMRs) of quarterly monitoring shall be submitted to the applicable DEQ regional office no later than the 10th day of April, July, October and January. Monitoring frequency of once per every three months (1/3 Months) equals the following three-month periods each year of permit coverage: January through March, April through June, July through September, and October through December.

B. Discharge of stormwater associated with industrial activity that does not combine with other wastewater:

<u>Parameter</u>	<u>Monitoring Requirement</u>
Flow	Report volume discharged during monitored storm event
Total Suspended Solids	Report maximum
pH	Report minimum and maximum

Monitoring and reporting of grab sample analysis results are required once per year for a storm event that produces a discharge from the site. A discharge from a stormwater management structure must be sampled at the time the discharge occurs and must be representative. All other stormwater discharges must be taken when the discharge occurs, provided the interval from the preceding measurable storm event is at least 72 hours. The sample must also be taken during the first 30 minutes of the discharge. There are some exemptions to these timing requirements.

DMRs of yearly stormwater monitoring (January 1st to December 31st) must be submitted to the applicable DEQ regional office no later than the 10th day January.

For stormwater that is not combined with other wastewater, if total suspended solids (TSS) monitoring results exceed 100 mg/L daily maximum, the stormwater pollution prevention plan (SWPPP) must be reviewed for necessary changes, a routine facility inspection must be performed within five days of becoming aware of the exceedance, documentation must be maintained as specified, and any deficiencies must be corrected.

Permittees also must conduct calendar quarterly visual monitoring of discharges of stormwater associated with industrial activity. This monitoring must include examination of representative storm event discharges from the facility including observations regarding color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution. This permit condition has been relocated in the general permit regulation to follow the stormwater effluent limits table (I A 2) from the conditions addressing routine facility inspections.

III. Basis for Part I Effluent Limits and Monitoring Requirements for Commingled Wastewater

Mining area wastewaters are recycled as a source of processing water, lost by evaporation or discharged. The discharges that are not recycled are controlled by limitations in this general permit. These discharges may consist of stormwater associated with industrial activity which has come in contact with overburden, raw material, intermediate product, finished product, byproduct or waste product; process wastewater which may include water used in the process of washing mined materials, vehicle or equipment degreasing wastewater,

¹ Where the Water Quality Standards establish alternate standards for pH, those standards shall be the minimum and maximum pH effluent limits.

miscellaneous plant cleanup wastewater and mine pit dewatering, which may include the above collected discharges along with accumulated groundwater that enters the mine. Treatment usually consists of sedimentation.

The discharge parameters to be limited are pH and TSS.

The pH limitation is based upon Virginia's water quality standards and federal effluent guidelines (40 CFR Part 436). Effluent guidelines (40 CFR Part 436) require pH limits of 6.0 – 9.0 Standard Units (SU). Stream standards for pH are in most cases in the range of 6 to 9 SU; however, there are special standards in effect in some areas (e.g., 6.5 – 9.5 in some valley streams or 3.7 – 8.0 in some swamp waters). However, because DEQ comports with federal effluent guidelines for its general permits, pH limits cannot go below 6.0 or above 9.0. For example, a 6.5 to 9.5 special stream standard will necessitate a 6.5 to 9.0 effluent limit and a 3.7 – 8.0 special stream standard will necessitate a 6.0 – 8.0 effluent limit.

TSS limitations are based on federal effluent guidelines for some of the industrial categories covered by the general permit and at levels that, based on the Department's experience with individual VPDES permits, will protect receiving waters from solids impacts.

TPH monitoring is not retained in this reissuance for outfalls that convey discharges from vehicle or equipment degreasing activities (normally through an oil-water separator). Review of TPH data from the last two permit cycles indicated negligible levels (i.e., generally below detection levels) of TPH being discharged.

The monitoring frequency and sample type have been established after considering the consistency and nature of these operations, the existing analytical data and the potential environmental risk and consequences of the discharges. Reporting of monitoring data is required quarterly.

IV. Basis for Part I Storm Event Monitoring Requirement

Stormwater associated with industrial activity that is not combined with process wastewater may be discharged from mining activities covered by this permit subject to the applicable conditions of the permit, including annual monitoring for TSS and pH. This stormwater may have come in contact with or been exposed to overburden, raw material, intermediate product, finished product or byproduct and it may contain sediments eroded from the exposed surfaces of the mine, stockpiles, overburden storage, processing areas, or overburden disposal areas. It is necessary for the protection of water quality in the streams receiving the stormwater runoff from a mining operation that appropriate erosion and sedimentation controls and practices be designed and implemented at these facilities. The erosion and sedimentation control practices mandated by the DMM regulations and imposed on the owners or operators of a mineral mine through their mining permit include adequate drainage, erosion and sediment control measures installed and maintained in accordance with a mandated and approved drainage plan, as well as requirements that temporary and permanent control facilities for mining operations be designed with outlets that can accommodate the rainfall from at least the 50-year and 100-year storm event, respectively. In addition, DMM regulations require that mineral mining sediment basins provide for 0.125 acre-feet per disturbed acre of storage capacity. This general permit also includes stormwater management requirements (see Section VI).

Under this general permit, permittees are required to monitor stormwater discharges for pH and TSS once per year over the term of the general permit and report the results to the Department. If TSS levels exceed an evaluation value, follow-up actions are specified. These stormwater monitoring requirements are comparable to benchmark provisions under the U.S. EPA 2015 Multi-sector General Permit (MSGP).

V. Basis for Special Conditions

The VPDES permit regulation (9VAC25-260-31) delineates the procedures and requirements applicable in VPDES permits pursuant to the Clean Water Act and the State Water Control Law. All special conditions protect water quality as required by the VPDES permit regulation. Additional explanations and citations are below.

Special Condition No. 12 from the 2014 general permit, which required the review of TSS monitoring data and potential follow-up for stormwater that does not combine with other wastewaters, has been moved to follow the table in I A 2 a in this general permit. This permit condition is similar to a condition of the EPA 2015 MSGP. This has been deemed a more appropriate location in the general permit since this provision addresses monitoring. See the discussion under section II of this fact sheet.

Special Condition No. 14 from the 2014 general permit has been removed in the reissued general permit. This condition required dischargers to the Chickahominy watershed to meet special effluent limitations for BOD₅, TSS, total phosphorus, ammonia and settleable solids. The basis for removing this permit condition is the fact that the applicability of the special Water Quality Standards at 9VAC25-260-310 m was revised so that the standards are only applicable to wastewater treatment facilities that treat an organic nutrient source. Nonmetallic mineral mines do not characteristically discharge an organic nutrient source. VPDES antibacksliding guidance² identifies the Chickahominy standards as technology limits (established by regulation) and indicates that antibacksliding restrictions do not apply to this category of limits. The guidance indicates that such standards are regulations and, thus, when applicable, no alternatives can be accepted; however, with the change in applicability, these regulations no longer apply to nonmetallic mineral mining.

A. Special Condition No. 1 requires that vehicles and equipment used in the industrial activity are to be operated and maintained in a manner that prevents pollution of surface or ground water. Petroleum products and other fluids are to be stored and handled in such a manner that the discharge of pollutants to state waters is prevented. The basis for this condition is the state water quality standards (9VAC25-260).

B. Special Condition No. 2 prohibits sewage discharges to surface waters under this general permit. Any sewage discharges would require coverage by a separate, individual permit. This condition is based on the typical characteristics of discharges from nonmetallic mineral mines and the corresponding absence of federal secondary sewage treatment standards in this permit.

C. Special Condition No. 3 prohibits the discharge of chemical additives other than those identified in the registration statement unless prior approval is granted by the board.

D. Special Condition No. 4 requires that the permittee submit a new registration statement if the DMM mining permit is modified or renewed in any way that would affect the location or characteristics of any discharge covered by the general permit. Any change to the mining facility that could impact discharge quality requires additional review before coverage under the general permit is continued. The basis for the condition is state water quality standards.

E. Special Condition No. 5 is a requirement for notification of discharges of any toxic pollutants not limited by the permit. The basis for the condition is 40 CFR 122.42(a) and 9VAC25-31-200 A.

F. Special Condition No. 6 requires that all materials, products and wastes resulting from the purchase, sale, mining, traction, transport, preparation, or storage of raw or intermediate materials, final product, by-product, or

² Guidance Memo No. 00-2011; Guidance on Preparing VPDES Permit Limits; To: Regional Directors; From: Larry Lawson; August 24, 2000. Pgs. 32-42.

wastes, be handled and stored or disposed of consistent with best management practices and so as to not permit a discharge of such product, materials industrial wastes, or other wastes to state waters, except as expressly authorized. The basis for the condition is state water quality standards.

G. Special Condition No. 7 prohibits the discharge of process wastewater pollutants from co-located asphalt operations. The basis is 40 CFR Part 443.

H. Special Condition No. 8 allows process water to be used for dust suppression on site. The basis for the condition is that, when implemented as a BMP, the use of process water as a dust suppressant can control or abate the discharge of pollutants. This condition also prohibits dust suppression during a storm event that results in an actual discharge from the site.

I. Special Condition No. 9 allows process water from mine dewatering to be provided to local property owners for beneficial agricultural use. This language is included in keeping with DEQ's pollution prevention philosophy.

J. Special Condition No. 10 prohibits the discharge of floating solids or visible foam in other than trace amount from process water discharges. This condition also prohibits solids deposition to surface water as a result of discharges associated with industrial activity. It further prohibits an oil sheen resulting from petroleum products discharged to surface water as a result of the industrial activity. Housekeeping and on site BMPs should maintain this requirement. The prohibition of oil sheen was added to a similar general permit (concrete products) in response to staff concerns that petroleum products are on the site and could lead to an oil discharge. Accidental spills of petroleum products are cleaned up immediately so as not to enter surface waters as per special condition No. 1. This special condition is an added measure of protection and something the inspector can look for to ensure proper BMPs, clean up measures or treatment is occurring. The citation in the water quality standards is 9VAC25-260-20.

K. Special Condition No. 11 requires all effluent limitations to be written using two significant figures. The basis for this condition is Guidance Memo No. 06-2016, Significant Figures for Discharge Monitoring Reports.

L. Special Condition No. 12 requires permittees subject to total maximum daily load (TMDL) waste load allocations established prior to this permit issuance to include measures and controls in the SWPPP that are consistent with the assumptions and requirements of the TMDL. If the TMDL establishes a numeric wasteload allocation that is applicable to discharges from the facility, the owner must conduct monitoring in accordance with Part I A and implement measures necessary to meet the allocation. The basis for this condition is Section 303(d) of the Clean Water Act, which requires that TMDLs be developed for streams listed as impaired, and 9VAC25-31-220 D.

M. Special Condition No. 13 requires discharges to be controlled as necessary to meet applicable water quality standards. This condition is consistent with VPDES regulations (9VAC25-220) and EPA recommendations.

N. Special Condition No. 14 provides a waiver for monitoring and routine quarterly inspections at sites that are inactive and unstaffed (temporarily closed). An annual site inspection is still required. The waiver request must be submitted to the board for approval. Reactivation of the site also requires board notification within 30 days unless approval for an alternate timeframe is received in advance from the board. Inactive and unstaffed facilities covered under are not required to meet the "no industrial materials or activities exposed to stormwater" standard to be eligible for this waiver, consistent with the conditional exemption requirements established in Part 8 Sector J (Non-Metallic Mineral Mining and Dressing) of the EPA 2015 MSGP.

O. Special Condition No. 15 describes how process water systems designed to operate as “no discharge” must be implemented. These systems may not discharge except in storm events greater than a twenty-five-year, 24-hour storm event. In the event of such a discharge, the permittee must report an unusual or extraordinary discharge per Part III H of the permit. No sampling or DMR is required for these discharges as they are considered to be discharging in emergency discharge conditions. These discharges may not contravene the water quality standards, or any provision of the State Water Control Law. Any other discharge from this type of system is prohibited, and shall be reported as an unauthorized discharge per Part III G of this permit. This special condition, which is a different design standard than the overflow provision in the pertinent ELGs, is based on best professional judgment of the staff and is consistent with the standard in Virginia’s Pollution Abatement permit regulation (9VAC25-32-30 A).

P. Special Condition No. 16 requires that permittees must use best management practices to ensure that contaminants do not enter surface waters as a result of blasting at the mining site. This condition addresses concerns with ammonia and nitrate deposition resulting from the use of explosives.

Q. Special Condition No. 17 describes how terminations of coverage under a general permit will be implemented. Permittees need to know this is an option available to them. This is being added to all general permits as they are reissued.

It is believed that the above effluent limitations and special conditions will maintain state water quality standards.

VI. Basis for Requirements for Stormwater Management

Stormwater management is required to reduce the potential for pollutants to reach state waters via stormwater discharges. Stormwater management requirements in Part II are generally current with stormwater management requirements in the VPDES General Permit for Discharges of Stormwater Associated with Industrial Activity (VAR05) and the EPA 2015 MSGP, while taking into account the characteristics of the industry to be regulated under this general permit.

Management of stormwater is to be achieved through the development of a stormwater pollution prevention plan (SWPPP). The SWPPP is intended to identify potential sources of pollution that may reasonably be expected to affect the quality of stormwater discharges as well as describe and ensure the implementation of practices that will reduce the pollutants in stormwater discharges. The SWPPP requirement maintains the flexibility for a site-specific plan to be developed and implemented but identifies specific components that the plan must address. These components include the pollution prevention team, a description of pollutant sources, and a description of stormwater controls (including BMPs, good housekeeping measures, preventative maintenance, spill prevention and response, routine inspections, employee training, recordkeeping and internal reporting, sediment and erosion control, and run-off management). As part of the contents of the SWPPP, the good housekeeping provisions in the general permit have been revised to include some additional language based on the EPA 2015 MSGP.

Quarterly inspections are required to identify sources of pollution and to evaluate whether the pollution prevention measures are being effectively implemented. The inspections are considered a means of determining compliance with permit conditions without requiring extensive sampling programs. The permittee is required to maintain records summarizing the results of inspections. The annual comprehensive site evaluation requirement has been removed in this reissued general permit and unique aspects of the comprehensive evaluation have been merged into the quarterly inspection requirements. This change is based on EPA’s 2015 MSGP, which consolidated the comprehensive site inspection and routine facility inspection procedures into one set of procedures to eliminate redundancies and reduce burden. In addition, this permit provides that where a facility has an E3 (Exemplary Environmental Enterprise) or E4 (Extraordinary Environmental Enterprise) status under Virginia’s Environmental Excellence Program (VEEP), routine inspection requirements are waived. This is

consistent with the VPDES General Permit for Discharges of Stormwater Associated with Industrial Activity and is based on the fact that such facilities are required under the VEEP program to implement an environmental management system (EMS), which includes implementation and evaluation components, as well as have a pollution prevention program and a record of sustained compliance with environmental requirements.

In its 2015 MSGP, U.S. EPA also included new provisions that address pre-mining earth-disturbing activities (i.e., section 8.J.4). Under Virginia law (§ 62.1-44.15:34) land-disturbing activities associated with surface mining are exempt from stormwater regulation provided such activities are conducted pursuant to a mining permit under Title 45.1. In addition, under § 62.1-44.15:55, permitted surface mining conducted under Title 45.1 is exempt from Virginia's erosion and sediment control law. Under state regulations, mining permits, which are required as a condition of this general permit, include an operation plan, drainage plan (including erosion and sediment control) and reclamation plan, and must meet performance standards that address topics including impoundments, drainage and sediment control, sediment basins, diversions, and water quality (4VAC25-31-10 through 570). These mining permit regulations apply starting with the first disturbance of any part of a site. Based on the statutory exclusions noted above and the existing state DMM permit regulations applicable to mineral mining, new pre-mining provisions have not been added to VAG84.

VII. Administrative

The general permit will have a fixed term of five (5) years. Every authorization to discharge under this general permit will expire at the same time and most existing covered owners' authorizations to discharge will be renewed on the same date.

All persons desiring to be covered by this general permit must register with the Department by filing a registration statement and submitting applicable fees. Owners of nonmetallic mineral mining facilities that are discharging on the effective date of this general permit, and which have not been covered under the previous general permit or an individual VPDES permit and desire to be covered under this general permit, are required to submit the registration statement.

The reissued general permit includes a requirement to include on the registration statement a list of chemicals added to wastewater or stormwater and that could be discharged, including Safety Data Sheets (SDS), the maximum proposed dosing rates, and a demonstration that the application or use will not result in aquatic toxicity to protect water quality in receiving streams. The use of chemicals, including cationic chemicals, by nonmetallic mineral mining facilities is a potential concern due to the potential aquatic toxicity of certain chemicals in particular settings (e.g., see 8.J.4.1.8 in the federal 2015 MSGP. This provision reflects EPA concerns regarding the aquatic toxicity of cationic chemicals, as discussed in the fact sheet to EPA's 2012 Construction General Permit). The additional information being requested is to ensure that permit staff have adequate information to evaluate the potential toxicity of any added chemicals that could be discharged and to approve, restrict or condition such use as appropriate. A demonstration that chemical use will not result in aquatic toxicity is somewhat flexible but must include information that allows DEQ to make informed judgements that discharges from these facilities will not contain chemicals at levels that pose aquatic toxicity. Such a demonstration should include a description of when, where and how the chemicals will be used, the manufacturer's specification regarding the use or recommended concentration of the chemical, and calculations of the maximum concentration expected in the effluent or other documentation showing that the maximum concentration expected in the effluent is not expected to adversely affect aquatic life. Additional information that could potentially support a demonstration includes why the chemical use is appropriate for the site conditions, whether the chemical is or is not a cationic polymer, if the chemical is used internally or as part of final treatment, controls or implementation procedures that protect water quality, and available toxicity data other than the SDS.

Owners of existing operations covered under an individual VPDES permit that wish to seek coverage under the general permit must file a registration statement at least 240 days prior to the expiration date of the individual VPDES permit. Owners of existing operations covered under the previous general permit seeking to retain coverage under the reissued general permit must file a new registration in accordance with the reissued general permit requirements at least 60 days prior to the expiration of the existing permit. For all new facilities that will begin activities after the effective date of this permit, the registration statement must be filed at least 60 days prior to the commencement of discharge.

This general permit does not cover activities or discharges covered by an individual VPDES permit until the individual permit has expired or has been terminated. Any person conducting an activity covered by an individual permit which could be covered by this general permit may request that the individual permit be terminated and register for coverage under this general permit. Any owner or operator not wishing to be covered or limited by this general permit may make application for an individual VPDES permit in accordance with VPDES permit application procedures.

To gain coverage under this general permit an owner must submit the registration information required in 9VAC25-190-60 (a registration statement form will be provided by the board), submit the required permit fee and comply with the applicable effluent limitations and other requirements of the permit. An additional requirement for this general permit is that the owner must have a mineral mining permit approved by the Virginia Department of Mines, Minerals and Energy, Division of Mineral Mining under provisions and requirements of Title 45.1 of the Code of Virginia. Owners of mineral mines in bordering states with discharges in Virginia must provide documentation that they have a mining permit from the appropriate state authority. Mineral mines owned and operated by governmental bodies not subject to the provisions and requirement of Title 45.1 are exempt from this requirement.

Coverage under this general permit will not be issued for any new or increased discharge that will result a violation of the board's antidegradation policy contained in the Virginia Water Quality Standards at 9VAC25-260-30 or to a facility where the discharge is not consistent with the assumptions and requirements of an approved TMDL for the receiving stream. Coverage under the general permit is also not available to owners that discharge to state waters that are specifically named in other board regulations that prohibit such discharges (e.g., exceptional or tier 3 waters).

Consistent with U.S. EPA regulations, DEQ is in the process of implementing electronic reporting requirements (see generally, 9VAC25-31-1020). As electronic reporting is implemented, these requirements are expected to affect the process and potentially some requirements for the submittal of registration statements, notices of termination, discharge monitoring reports, and select other reports. For this general permit, start dates for any electronic reporting requirements will be provided in a schedule approved by the department, along with additional information as deemed appropriate.