

MEMBER JURISDICTIONS

July 19, 2013

CHESAPEAKE

Mr. Burton R. Tuxford
Environmental Specialist II
Department of Environmental Quality
629 East Main Street
PO Box 1105
Richmond, VA 23218

FRANKLIN

GLOUCESTER

Re: Virginia Pollutant Discharge Elimination System (VPDES) General Permit Regulation for Storm Water Discharges Associated with Industrial Activity [9 VAC 25 - 151]

HAMPTON

ISLE OF WIGHT

Dear Mr. Tuxford,

JAMES CITY

The Hampton Roads Planning District Commission (HRPDC) appreciates DEQ's efforts to reissue a Virginia Pollutant Discharge Elimination System (VPDES) General Permit Regulation for Storm Water Discharges Associated with Industrial Activity [9 VAC 25 - 151] that is consistent with Virginia's Phase I Watershed Implementation Plan for the Chesapeake Bay TMDL. However, the following recommendations are submitted on behalf of the HRPDC's member localities.

NEWPORT NEWS

NORFOLK

1. **Section 60 Registration Statement and Storm Water Pollution Prevention Plan (SWPP):** C5 requires the facility to identify whether or not it discharges, or will discharge, to an MS4. If so, the permittee must provide the name of the MS4 owner. This provision is important because permit special condition #12 requires the permittee to notify the MS4 owner in writing of the existence of the discharge within 30 days of coverage under this permit. In order to facilitate timely identification and notification of the MS4, the HRPDC encourages DEQ to include a table of MS4 localities and program administrator contact information with the Registration Statements that are made available to potential permittees.

POQUOSON

PORTSMOUTH

SOUTHAMPTON

SUFFOLK

2. **Part IB - Special Conditions:** The HRPDC recommends that facilities be required to collect monitoring data for total nitrogen, total phosphorus, and total suspended solids for the entire permit cycle rather than just the first two years. While the data collected in the first two years will serve to characterize the discharge, the subsequent monitoring can be used to determine continued compliance with the TMDL.

SURRY

VIRGINIA BEACH

WILLIAMSBURG

YORK

Sincerely,

Thomas G. Shepperd
Chairman