

## Groundwater Petroleum Remediation Systems General Permit Summary of Comments & IDEM Responses

The draft general permit was placed on public notice on December 15, 2014. Several modes of public notice were utilized. Notices were placed in the Indiana Register, in the Indianapolis Star and 6 other large circulation newspapers in the State of Indiana, on IDEM's web site at <http://www.IN.gov/idem/6777.htm>. The full text of the general permit and fact sheet are posted IDEM's web page for NPDES Permits on Notice at (<http://www.IN.gov/idem/cleanwater/2480.htm>) and were sent to the existing permittees via email. During the official public notice comment period, which ended on February 6, 2015, IDEM received comments from the following persons:

Bill Bloemer (BB)

Michael Cox, Practical Environmental Consultants, Inc. (MC)

Kimberly A. Jurczak, P.E., Project Engineer, American Environmental Corporation (KAJ)

Chris Parks, LPG, LWO – Senior Project Manager, Creek Run L.L.C. Environmental Engineering (CP)

Edward Stehno, Senior Projects Engineer, Engineering & Environmental Services Division, CARDNO (ES)

*Comment: If this Draft General Permit is for Groundwater Petroleum Remediation Systems, why does the language in Section 1.3 a) state "this general permit covers discharges comprised solely of process wastewater and mine dewatering water from facilities involved in sand, gravel, dimension stone, or crushed stone operations"? It appears 1.3 (b) is correct. (BB, KAJ, CP)*

IDEM RESPONSE: This was a typographical error and it has been corrected.

*Comment: Regarding the pH monitoring frequency, the Draft ING080 permit states in Table 2 that the pH monitoring frequency will be Daily. The current requirement for monitoring frequency for pH under the current General Permit for Groundwater Petroleum Remediation Systems is once monthly. The Draft Fact Sheet for draft permit ING080 (section H.1.b) states that "The effluent limitation and monitoring requirements of pH is the same as that which exists in the current general permit-by-rule, 327 IAC 15-10." Is the pH sampling frequency for Draft ING080 intended to remain at 1x monthly or be increased to 1x daily?*

IDEM RESPONSE: The frequency of pH monitoring is to remain at one time per month.

*Comment: Section 1.2 states that this permit covers "only sites dealing with gasoline-based contamination". What about sites that contain other petroleum based contamination, in addition to gasoline based contamination, such as diesel fuel or fuel oil? Will they be required to obtain an individual permit? (BB)*

IDEM RESPONSE: Several representatives of the regulated community raised this issue. OWQ staff consulted with staff of the IDEM Office of Land Quality and U.S. EPA to determine what effluent limits and monitoring requirements would be appropriate for such circumstances. The general permit has been amended to remove the restriction of just gasoline for defining what is meant by “petroleum remediation”. The revised language also includes “diesel fuel and kerosene” and in such cases additional effluent parameters will be applicable to the discharge as found in Table 3 of Section 2.1 of the general permit.

*Comment: The groundwater remediation systems are placed on active gas stations. Often times, these gas stations also offer diesel and kerosene for their customers. There is a potential that the diesel and kerosene USTs will leak and will need to be remediated as well. Would IDEM OWQ consider adding diesel and kerosene based contamination to the general permit language in addition to gasoline contamination? Additional constituent parameters may need to be analyzed and included in the general permit. (KAJ)*

IDEM RESPONSE: See response above.

*Comment: Some gasoline stations have expanded to include diesel fuel for semi-trucks. Over the past few years, a number of truck stops are beginning to add Diesel Exhaust Fluid (DEF) USTs and pumps. The DEF pumps are typically located adjacent to fuel pumps such that the vehicle operator can fill up both diesel and DEF without moving the truck. There is a potential that the DEF USTs will leak and will need to be remediated as well. Would IDEM OWQ consider adding DEF based contamination to the general permit language in addition to gasoline contamination? Additional constituent parameters may need to be analyzed and included in the general permit. (KAJ)*

IDEM RESPONSE: See response above.

*Comment: Can the Groundwater Petroleum Remediation Systems Permit be expanded to cover gasoline-based, diesel-based, and other petroleum compounds (fuel oil, kerosene, jet fuel, etc.) by expanding the required parameters for monthly monitoring. Specifically by adding Naphthalene to the Benzene requirement for reporting. Naphthalene is also found in gasoline and is generally harder to remove from the waste stream than benzene, thereby making it a good indicator if the waste stream meets discharge requirements. (CP)*

IDEM RESPONSE: See response above.

*Comment: Per the discussion at the Friday January 30<sup>th</sup> information meeting the draft of the NPDES permit for Groundwater Petroleum Remediation Systems as written appears to be solely for “gasoline-based contamination”. Can this permit be utilized or*

*modified to include other potential petroleum releases such as diesel, kerosene, or other petroleum products which are commonly found at petroleum release sites? (ES)*

IDEM RESPONSE: See response above.

*Comment: For permit termination, is a permit termination request letter acceptable to the OWQ in lieu of the Notice of Termination (NOT) form? (KAJ)*

IDEM RESPONSE: A letter requesting termination of the general permit coverage will be acceptable if it provides all required information necessary to terminate the permit coverage.

*Comment: Some remediation systems have added water treatment additives in order to reduce the amount of scale build-up on the equipment due to hard water and to extend the life of the granulated activated carbon units. The IDEM excess liability trust fund (ELTF) has approved the addition of these water treatment additives to groundwater remediation systems. Can the IDEM ELTF approval be used for the IDEM OWQ approval? (KAJ)*

IDEM RESPONSE: No, the ELTF approval for water treatment additives is a different document than the document required by the Office of Water Quality for general permit coverage. A separate approval from the Office of Water Quality will be required for water treatment additives used in equipment covered by general permits.

*Comment: For reporting Noncompliance, will IDEM OWQ still accept the Noncompliance 24-hour Notification Fax Report (State Form 52415)? If so, will the IDEM OWQ accept the State Form 52415 in lieu of calling IDEM? Will the IDEM OWQ accept the State Form 52415 in lieu of submitting the required written report within 5 days? (KAJ)*

IDEM RESPONSE: Yes, submission of State Form 52415 to IDEM via fax is an acceptable way of reporting noncompliance in lieu of calling IDEM. IDEM actually prefers and encourages the submittal of this form electronically by sending it via email to [wwreports@idem.IN.gov](mailto:wwreports@idem.IN.gov). Submission of said document via fax or email within 24 hours of noncompliance fulfills both the oral and written reporting requirements.

*Comment: If an existing NPDES permit has an expiration date in 2015, prior to the Draft General Permit for Groundwater Petroleum Remediation Systems becomes effective, will the Permittee have to submit an additional Notice of Intent after the General Permit effective date? (KAJ)*

IDEM RESPONSE: Yes, the statute and the general permit require existing permittees to submit a Notice of Intent (NOI) *after* the new general permit is issued to demonstrate that the permittee intends to comply with the new general permit.