

Hydrostatic Testing of Commercial Pipelines 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 only one person, Mr. Rob Barkholz, Enbridge (RB)

Comment 1: Page 3 of 16 under Section 1.2 Discharges Authorized/Covered by this Permit states that "Permittees who are granted general permit coverage will remain covered under this permit until the earliest of the following:

. b) IDEM's receipt of the permittee's submittal of a Notice of Termination (see Section 5.0);...." However, Section 5.0 Requesting Termination of Coverage states that "The permittee will continue to be responsible for submitting all reports required by this permit and for remitting annual permit maintenance fees billed according to Indiana Statute IC 13-18-20 until IDEM approves the NOT." Section 5.0 appears to be inconsistent with Section 1.2 which indicates that coverage remains in effect until "IDEM's receipt of the permittee's submittal of a Notice of Termination."

IDEM RESPONSE: We have revised 1.2 b to make it clear that permittees are covered, and required to follow all conditions of the permit, until such time that they receive written confirmation from IDEM that their NOT has been approved.

COMMENT 2: It would improve clarity if Note [2] was to be revised as follows: "Four (4) grab samples shall be taken of the hydrostatic test water being discharged...."

IDEM RESPONSE: Note [2] has been revised as per your suggestion.

COMMENT 3: For clarity and consistency with Table 1, consider modifying language for Note [3] to reflect that both Monitoring Requirements and Quality or Concentration limitations for Total Residual Chlorine shall only apply whenever chlorinated intake water is used to hydrostatically test pipelines.

IDEM RESPONSE: The language in Note [3] has been modified to clarify this point.

COMMENT 4: Consider eliminating the requirement under (p) that requires the following information to be included in an NOI: "documentation of IDEM pre-approval for the use of any water treatment additives (WTAs) to be used with the hydrostatic test water." Obtaining pre-approval of all WTAs in association with an NOI is not practical as the dechlorinating agent that may be most appropriate depends upon characteristics

of the municipal water being used for the test, which can vary by municipal source. Specific characteristics of the discharge water required to obtain WTA approval, such as temperature or discharge characteristics, cannot be ascertained without knowledge of when the testing is performed, or until the most economical treatment method is determined. Consider using a procedure and language similar to what is used in the State of Michigan's general permits:

"This permit does not authorize the discharge of water additives without approval from the Department. Approval of water additives is authorized under separate correspondence. Water additives include any material that is added to water used at the facility or to a wastewater generated by the facility to condition or treat the water. In the event a permittee proposes to discharge water additives, including an increased discharge concentration of a previously approved water additive, the permittee shall submit a request to the Department for approval. See [Reference applicable section] for information on requesting water treatment additive use."

Consider methods and language similar to that in Part 1 Section A.3 of the attached link as a means of having permittees obtain approvals for WTAs.

http://www.michigan.gov/documents/deq/wrd-npdes-generalpermit-MIG670000_399823_7.pdf

IDEM RESPONSE: We have added text to Section 6 of the permit to clarify that the permittee may still apply for the use of additives that are deemed necessary by the permittee after he/she has received this approval of coverage under the general permit. The only prohibition IDEM will put on the permittee is that the additives must still be approved for use, and proof of this approval submitted, prior to their use.

COMMENT 5: Consider creating an approval system for "select water treatment additives" similar to what is described in the State of Michigan link below. This would allow more expedient approval for commonly used chemical products that are added to condition and treat the water to make it suitable for discharge, and are considered to not adversely affect aquatic life, and can be regulated through a permit with a chemical specific water quality-based effluent limit (WQBEL), using a parameter that mitigates the WTA toxicity (i.e., pH limits that mitigate a pH adjusting WTA).

http://www.michigan.gov/deq/0,4561,7-135-3313_3682_3713-317137--,00.html

IDEM RESPONSE: The process of approving water treatment additives is separate from the permitting process for General Permits. Therefore revising this process is outside of the scope of what we can do as a part of this permit.