HRSD Pretreatment & Pollution Prevention (P3) Division Construction Dewatering Policy

Q1. Why does HRSD not want groundwater, surface water, etc. discharged to the sanitary sewer without being contacted first?

A1. Per Section 301 of the HRSD Industrial Wastewater Discharge Regulations, significant quantities of surface water, rainwater, stormwater, groundwater, and other similar waste streams are prohibited from discharge to the sanitary sewer. However, HRSD understands there are times the water associated with construction activities cannot be covered under one of the Virginia Department of Environmental Quality (DEQ) General Virginia Pollutant Discharge Elimination System (VPDES) permits. The City or contractor (e.g. locality contractors, private contractors, engineering consultants, etc.) will need to submit an explanation as to why a discharge to the ground, storm sewer or surface water is not feasible. If this documentation is submitted, the water may qualify for discharge to the sanitary sewer or for discharge through a Centralized Waste Treatment (CWT) facility.

Q2. Who needs approval to discharge water associated with construction dewatering activities?

A2. Anyone who needs to discharge water from construction dewatering activities must secure approval from the proper regulatory authority. For discharge to the ground, storm sewer, or surface waters, approval must be provided by DEQ and the locality where the work is being performed. If the above discharge routes are not approved and approval is sought for sanitary sewer discharge, one must get approval from HRSD's P3 Division and the locality where the work is being performed.

Q3. How are the discharges associated with a construction dewatering project regulated?

A3. Localities and/or contractors that are expecting to have water discharges associated with construction dewatering activities must first apply for one of DEQ's General VPDES permits. If DEQ rejects permit coverage due to technical reasons, HRSD's P3 Division will evaluate the potential for discharge to the sanitary sewer. P3 regulates discharges associated with construction dewatering activities through the issuance of a Letter of Authorization (LOA). Due to the short duration of construction activities, LOAs are issued versus an HRSD Direct Wastewater Discharge Permit. An LOA may contain sampling requirements, billing requirements, and special conditions. Discharges must also comply with HRSD's Industrial Wastewater Discharge Regulations.

Q4. What if DEQ will only permit certain sections of the construction project with a DEQ General VPDES permit?

A4. HRSD will evaluate the potential for the sites not covered by the DEQ General VPDES permit to be covered by an LOA. If an LOA will be issued for these sites, the LOA will specify coverage only for those sites not covered by the DEQ General VPDES permit. HRSD will not issue an LOA for the entire site.

Q5. What items are required to obtain approval to discharge water associated with construction dewatering activities to the sanitary sewer?

A5. If discharge via a DEQ General VPDES permit is denied, the locality or contractor must contact HRSD's P3 Division to identify what information must be submitted for discharge consideration as each project is a little different. However, here is a list of the minimum items required:

- A statement of rejection from DEQ must be submitted to HRSD.
- The name, location, and duration (expected start and end dates) of the project. HRSD will also need the associated Capital Improvement Program (CIP) project number, if applicable. The CIP project number is usually associated with locality projects and is included in the subject line of the LOA.
- Demographic information for the contractor or locality that will be responsible for ensuring compliance with the LOA. This information includes name, title, company name or locality, department (if applicable), mailing address, email, and phone number.
- An environmental site investigation of the potential soil contamination and the current and former commercial and industrial facilities must be conducted. The results must include a summary of the contamination, site history, and sources of contamination. Groundwater from Superfund and/or Installation Restoration (IR) sites are not authorized for discharge to the sanitary sewer.
- Recent characterization of the groundwater is required to determine acceptance and identify what type of pretreatment will be required for discharge to the sanitary sewer. The contractor or locality must provide the data and projected pretreatment required. At a minimum, solids separation or filtration is required for all discharges to the sanitary sewer.
    - Minimum characterization: pH, As, Cd, Cr, Cu, Pb, Ni, Zn, Hg, Ag, HRSD's Toxic Organics List [including Methyl tert-butyl ether (MTBE)]. Depending on location and potential, HRSD may also require Oil & Grease (SGT-HEM), Polychlorinated Biphenyls (PCBs), Dioxin scan, and other pollutants. It is very important to reach out to HRSD's P3 Division to ensure the proper characterization is completed.
- Proposed daily discharge volumes must be provided. This is required to coordinate hydraulic capacity between the locality and HRSD. All discharges of water associated with construction dewatering activities will be limited based on available sanitary sewer capacity and/or pollutant loadings. The locality where the construction is taking place must confirm their hydraulic capacity prior to submitting information to HRSD. P3 staff will work with HRSD Engineering staff to determine HRSD's available hydraulic capacity. Also, discharge volumes are required to determine what discharge limitations apply as outlined in Section 301 and Appendix A of the HRSD Industrial Wastewater Discharge Regulations.
- Billing contact information, to include contact name and billing address, must be provided. To determine accurate volumes for billing and compliance, a dedicated effluent meter must be installed to all sanitary sewer discharges associated with construction dewatering activities. Billing, and applicable surcharges, are based on the current rates outlined in HRSD's Rate Schedule and can be found online at www.hrsd.com/rateschedule.shtml#rates
- A list of 24-hour emergency contacts: name, phone number, email, and affiliation. If project is for a locality, at least one emergency contact for the locality and one emergency contact for the contractor must be provided.

Q6. Will HRSD have to inspect the site prior to issuing the LOA?

A6. Yes, HRSD will perform a site inspection to ensure the pretreatment system is set up, a proper sampling point is available, verify the sanitary sewer entry point, an effluent meter is installed, and obtain meter info for billing account set up.

Q7. What if I want to have discharge approval to the sanitary sewer as a backup in case sampling under the DEQ General VPDES permit show limitation exceedances and DEQ requires alternate discharge?

A7. The supporting documentation outlined in A5 can be submitted to HRSD prior to the start of the construction activities so they will already be on file and reviewed. However, HRSD will not formerly issue an LOA until one is required. Active LOAs require oversight and administration by HRSD, even if the LOA is not used by the contractor or locality. Due to the impact this has on resources, the LOA is not issued until required for sanitary sewer discharge.

Q8. What if it is an emergency and I cannot wait for HRSD to issue the LOA?

A8. There are CWT facilities in the HRSD service area that are available to assist with the proper disposal of water associated with construction activities until the LOA is issued. For the current list of CWT facilities, please contact the HRSD P3 Division.

Q9. How long does it take to obtain an LOA?

A9. If all the required information has been submitted to HRSD, the LOA may be issued in as quickly as 10 business days. However, approval times may take longer depending on the information provided to HRSD, the complexity of the project, locality coordination, need for additional information, and HRSD staffing.