



### **HRSD's Construction Dewatering Policy**

The Virginia Department of Environmental Quality (VDEQ) has a General Virginia Pollutant Discharge Elimination System (VPDES) Permit in place to cover discharges from construction dewatering activities. On the General VPDES Permit application, there is a question that requires applicants to determine if discharge to the sanitary sewer is an option. The General VPDES Permit is in place for the entire Commonwealth of Virginia, and the sanitary sewer, in most cases, is the better option because those systems have the capacity, or do not have regulations prohibiting discharge of these waste streams to the sanitary sewer.

However, HRSD is under a federal consent decree that requires the elimination of water entering the sanitary sewer system that is not sewage. This provides HRSD with the ability to adequately control capacity related overflows and shifts the hierarchy of preferred approaches in the Hampton Roads region when dealing with water generated during construction activities. In addition to the consent decree, HRSD prohibits the discharge of surface water, groundwater, stormwater, and other similar waste streams to the sanitary sewer in Section 301 of the HRSD Industrial Wastewater Discharge Regulations. For these reasons, HRSD must default to denying the discharge of groundwater from construction dewatering activities to the sanitary sewer, unless coverage under the applicable General VPDES Permit is not available. Under no circumstances will HRSD entertain groundwater discharges to the sanitary sewer from outside the HRSD Service Area.

All projects must first attempt to secure approval and coverage from the VDEQ. Applicants must work with the VDEQ to determine what parameters must be sampled and analyzed to determine if coverage under one of the applicable General VPDES Permits is an option. If permit coverage is rejected, then the information provided to the VDEQ can be provided to HRSD's Pretreatment & Pollution Prevention (P3) Department to determine if discharge to the sanitary sewer is authorized through the issuance of a Letter of Authorization (LOA). Additional information or sampling may be required to obtain an LOA, but this will be project specific and depend on the project location, reasoning behind the General VPDES Permit coverage rejection, and the details of the other information provided to the VDEQ.

An LOA will not be issued in combination with a General VPDES Permit. However, there are times that a General VPDES Permit will only cover portions of the project, and other portions are rejected for coverage. Another scenario is if an emergency occurs during construction and VDEQ no longer allows discharge through the issued General VPDES Permit. In these situations, HRSD will evaluate the available information to determine if an LOA may be issued, if additional information is required, or if the groundwater must be handled through an alternative disposal option. There are local Centralized Waste Treatment (CWT) facilities that may accept the groundwater in the interim while awaiting on LOA determination from HRSD. CWTs will still require analytical data, site information, and approval from HRSD to determine if they are allowed to accept groundwater for treatment and discharge to the sanitary sewer. Groundwater may not be sent to a CWT in lieu of pursuing approval and coverage through a General VPDES Permit.