

NCG140000: Response to Comments on Draft Permit (2022 Renewal)

1. If any monitoring parameters appear to demonstrate substantial industry compliance, CRMCA will be requesting that these parameters be removed as monitoring parameters from the next version of NCG14.

RESPONSE: We currently do not anticipate removing any parameters from monitoring. All listed monitoring parameters in the NCG140000 General Permit are necessary for preserving NC Water Quality standards.

2. Although not specifically part of NCG14, CRMCA will be requesting a review of the requirements for closed-loop recycle wastewater treatment system (i.e., non-discharging concrete washout basin systems), since the requirements for a system which does not discharge to surface water (which should be encouraged, and include streamlined requirements) are far more onerous and costly (through the Division of Water Resource's Aquifer Protection Section) than those for systems that do discharge through NCG14, which do not require the same level of requirements. We will request that the requirements for non-discharging systems be streamlined and made more equivalent to the accessible and reasonable requirements contained for discharging systems present in NCG14.

RESPONSE: Our requirements for closed loop recycle systems following the guidelines set for by NC Administrative Code 15A NCAC 02T .1000.

3. With regards to wastewater treatment systems covered by this permit, it would likely be helpful if they can be included within the definitions section of NCG14. CRMCA would be happy to assist in the definition of these systems as they exist at covered facilities.

RESPONSE: Our General Permit NCG140000 Section F specifically states what types of wastewaters are covered under NCG140000. The Definitions Section also includes Allowable Non-Stormwater Discharges.

4. Given the tiered response nature of NCG14, CRMCA would like to request that future versions of this permit consider the potential of reduction of monitoring after repeated "passing tests" (particularly for stormwater discharges), such as an elimination of passing parameters or a reduction in testing frequency, which is available to permittees covered by the Federal MSGP or NPDES stormwater permits in other states. This would provide a tangible incentive to better performance under NCG14 by permittees as well as a cost savings.

RESPONSE: Our Program is confident in the Tier Response process we have implemented. It is important for record-keeping purposes and to preserve water quality standards. When a sample exceeds a stormwater benchmark, it is not a violation of the permit, and the Division wants to assist the permittee in moving back under benchmark. When a sample exceeds a wastewater limit, it is a violation of wastewater effluent limitations, and we cannot modify the response process for wastewater discharges.

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5. Remove the monitoring requirement for daily flow rate being captured by a continuous flow measurement device.

RESPONSE: The requirement for reporting daily flow rate is a requirement set forth in NC Administrative Code 15A NCAC 02B .0505. Daily flow rate calculations are key for knowing how to treat pH for a volume of water. There are limits set forth for wastewater discharged to High Quality Waters or outstanding Resources Waters.

6. Recommend that monitoring be explicitly restricted in this permit only to periods of active, normal operating hours for permitted facilities. This would eliminate the potential for having to take samples after hours, during extreme weather, on holidays, etc., and would certainly promote on-site safety for permitted facility personnel.

RESPONSE: Our General Permits already require sampling only during a facility's normal business hours and non-adverse weather conditions.