



**NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) GENERAL PERMITTING
FOR DISCHARGE OF PETROLEUM CONTACT WATER
VARIOUS LOCATIONS THROUGHOUT TEXAS & OKLAHOMA (& EXPANDING!)**

BRIEF DESCRIPTION OF SERVICES:

Wright Environmental Services (Wright) is retained by a major national truck stop client and multiple service stations and petroleum underground storage tank (UST) contractors to manage their state-level National Pollutant Discharge Elimination System (NPDES) general permitting and compliance for discharges of petroleum contact water to surface drainage. Petroleum contact water at our client's facilities is sometimes generated during construction activities requiring excavation below the groundwater table at known petroleum impacted sites and during UST system installation testing, repair, upgrade, and removal activities. Since the Clean Water Act requires proper permitting be in place prior to discharge of any water that has contacted petroleum, states including Texas, Oklahoma, Louisiana, and Arkansas fortunately offer general permit coverage which allows authorized facilities to discharge their petroleum contact water meeting specified water quality criteria to surface drainage (i.e., roadside ditches) as an alternative to the generally costly and often inefficient/inflexible vacuum truck recovery and offsite transport and disposal options available for known or suspected petroleum impacted water. Wright has permitted and maintained permit compliance for the discharge of petroleum contact water at several of our client's truck stop and retail facilities located in Texas and Oklahoma and is working to expand our permitting services to other states as client needs arise.



GENERAL PERMITTING DETAILS:

Coverage under a general permit which authorizes discharge of petroleum contact water to surface drainage provides flexibility to our travel stop and service station clients in terms of lawful water disposition. General permit coverage is obtained by applying to the state regulatory agency for state-issued authorization. The level of effort, cost, and timeframe for approval associated with the NPDES general permitting process vary by state; however, The application process generally requires submittal of an application fee and form(s) describing the volume and characteristics of the influent water, the collection and treatment processes, the discharge volume and characteristics,

and the flow path to the nearest classified segment of a surface water body. Maps depicting the facility, the collection and treatment system, the flow path of the discharge to the nearest receiving water body, and the surrounding topography are required by some states to be submitted with the application.



Continued authorization for general permit coverage typically requires payment of annual permit renewal fees which vary by state and sometimes permit complexity and/or effluent characteristics. General permits are reissued every 5 years, and a facility's coverage can be extended under a reissued general permit by submitting a notice of intent to renew coverage along with the appropriate fee(s).

Specific monitoring and reporting requirements vary by state; however, all states require periodic monitoring, sampling, and reporting for general permit compliance. Compliance requirements vary by state and facility in frequency and the specific parameters required to be sampled and reported. Periodic discharge monitoring reports (DMRs) must be prepared electronically and submitted through the respective state's online data portal.

APPLICATIONS FOR GENERAL PERMIT AUTHORIZATION:

Wright's clients have found our general permitting solution to be helpful in a variety of situations involving a high water table and/or significant rate of recharge which we have attempted to briefly summarize below:

- Dewatering for scheduled work involving UST system installation, testing, repairs, upgrades and/or removal;
- Dewatering for excavation work in areas with suspected or known petroleum impacted soils and/or groundwater; and
- Dewatering frac tanks used for temporary storage during emergency responses or unscheduled UST system work – provides time to receive analytical results to confirm whether water requires treatment prior to discharge.

