

Appendix K. DNREC Approval for Exemption of Georgetown Maintenance Yard from Monitoring Requirement



STATE OF DELAWARE
DEPARTMENT OF NATURAL RESOURCES &
ENVIRONMENTAL CONTROL
DIVISION OF WATER RESOURCES
89 KINGS HIGHWAY
DOVER, DELAWARE 19901

SURFACE WATER DISCHARGES SECTION

TELEPHONE: (302) 739-9946
FACSIMILE: (302) 739-8369

November 18, 2008

Ms. Marianne Walch
Environmental Scientist
DelDOT NPDES Section
State of Delaware Department of Transportation
800 Bay Road
P.O. Box 778
Dover, DE 19903

RE: Modification to Stormwater Pollution Prevention Plan
Georgetown Maintenance Yard

Dear Ms. Walch:

In accordance with your October 28, 2008 letter, the Department approves of your request to exempt DelDOT's Georgetown Maintenance Yard from its analytical monitoring requirement, effective immediately. Please modify Section 6.0 of the facility's Stormwater Pollution Prevention Plan accordingly.

Should you have any questions, please feel free to contact me at (302) 739-9946.

Sincerely,

Amber N. Moore
Environmental Scientist
Surface Water Discharges Section

Received

NOV 24 2008

Business Management

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STATE OF DELAWARE
DEPARTMENT OF TRANSPORTATION

800 BAY ROAD
P.O. Box 778
DOVER, DELAWARE 19903

CAROLANN WICKS, P.E.
SECRETARY

October 28, 2008

Amber Moore
Division of Water Resources
Surface Water Discharges Section
Department of Natural Resources and Environmental Control
89 Kings Highway
Dover, DE 19901

Subject: Modification to Stormwater Pollution Prevention Plan, Georgetown Maintenance Yard

Dear Amber:

This letter serves as a request that DelDOT's Georgetown Maintenance Yard henceforth be exempted from its analytical monitoring requirement, currently incorporated in the facility's Stormwater Pollution Prevention Plan, Section 6.0.

In June 2008, reconstruction of the stormwater retention pond on that site was completed. The reconstruction resulted in significantly increased storage capacity. As a result, the water level in the pond routinely has remained well below the weir opening of the outfall riser, even during very heavy rainfalls. Repeated attempts to obtain stormwater discharge samples during the summer and fall of this year have been unsuccessful. The attached memo from our monitoring consultant, KCI Technologies, describes their observations and sampling attempts at this pond.

We believe that suspension of analytical monitoring at the Georgetown Yard will not in any way adversely impact our ability to ensure that discharges from the site meet all state standards. The primary operation at this facility is vehicle maintenance and storage; thus the site has limited potential for generating stormwater pollution. Monitoring data collected in previous years has consistently demonstrated that the Georgetown Maintenance Yard discharges the lowest levels of targeted chemicals of any of the five yards that we monitor (see attached table of 2007 data).

If you have any questions about this request, or require additional information, please contact me by phone at (302) 760-2195, or by email at marianne.walch@state.de.us.

Sincerely,



Marianne Walch, Ph.D.
Environmental Scientist
DelDOT NPDES Section

cc: Randy Cole, DelDOT NPDES Program Manager
Jeff Reed, Georgetown Yard PPP Team Leader

2007 winter and summer first flush sampling results from DelDOT maintenance facilities.

PARAMETER	KIAMENSI		BEAR		CHESWOLD		HARRINGTON		GEORGETOWN	
	Mar	Aug	Mar	July	Jan	Aug	Jan	Sept	Jan	Aug
TOTAL SUSPENDED SOLIDS	82.0	33.0	318.0	783.0	6.0	469.0	106.0	9.0	17.0	19.0
SURFACTANTS, MBAs	0.53	0.37	0.15	0.18	0.21	0.43	0.10	0.23	0.08	0.17
CHLORIDE	5750	1910	806	260	457	443	83	97	9	17
TPH-GASOLINE RANGE ORGANICS	<0.05	<0.05	0.001	0.025	<0.05	<0.05	<0.05	<0.05	<0.05	<0.05
TPH-DIESEL RANGE ORGANICS	0.24	0.18	0.22	0.18	<0.1	0.22	<0.1	<0.1	<0.1	0.14
pH	7.38	8.26	7.11	7.10	8.24	7.68	7.24	7.59	7.38	6.90



MEMORANDUM

TO: Marianne Walch, PhD

FROM: Chris Bolton

DATE: October 21, 2008

SUBJECT: Georgetown (1) Pond WWM Sampling History
KCI Job Order No. 0203019E.MY

The purpose of this Memo is to summarize the WWM sampling history of the Georgetown (1) pond from 2004 to the present, and to discuss the current conditions of the pond, which have prevented any successful WWM events since its reconstruction in 2007.

KCI began monitoring the Georgetown (1) Pond in Fall 2004. Six samples were collected at the pond between 2004 to 2007 (2 samples per year). These samples were collected under the original design of the Georgetown Pond.

The reconstruction of the pond to increase capacity commenced in October 2007 and ended in June 2008. WWM was placed on hold throughout the reconstruction process, which prevented KCI from collecting a 2008 Winter WWM Sample (Jan-June).

Although reconstruction was completed in May 2008, KCI has been unable to collect a 2008 Summer WWM sample (July-Dec). The pond's reconstruction has increased the capacity requiring a much larger volume of water to fill and flush the pond to allow WWM sampling. Recent attempts to sample the pond have revealed the following:

- September 6, 2008 Rain Event: Precipitation in Georgetown totaled 1.41 inches. KCI field crew declared a False Start at the pond when water level remained 2 feet below the weir opening on the outfall riser.
- September 25, 2008 Rain Event: Precipitation in Georgetown totaled 2.04 inches. However, during chloride testing of the pond several days after the rain event there were no obvious signs that first flush had occurred. The water level in the pond was still approximately 1 foot below the weir opening on the outfall riser and the area around the outfall from the pond was completely dry.

In summary, KCI has not collected any WWM samples from the Georgetown (1) pond during the 2008 Winter Sampling Period or the 2008 Summer Sampling Period. During the past two rain events, less than three weeks apart, a total of 3.45 inches of rain fell without any flush at the pond.



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