

HYDROSTATIC TEST DISCHARGE

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March 26, 2010

INTRODUCTION

- Any water released from hydrostatic pressure tests that reaches “Waters of the State” will be discharged in accordance with the Federal Water Pollution Control Act, and the Ohio Water Pollution Control Act.
- OEPA established the General Permit (GP) Authorization To Discharge Hydrostatic Test Water (OHH000001), which became effective Nov. 1, 2007. Generally, most discharges can be approved under the GP. GP ‘s are used to cover discharges that will have a minimal affect on the environment.
<http://www.epa.ohio.gov/dsw/permits/gpfact.aspx#currently%20available>
- There may be some discharges that will require an Individual Permit.
- There may be some discharges that will not require a General Permit or an Individual Discharge Permit.

GENERAL PERMIT - ADVANTAGES

- Simplified one-page form
- The one page application form doesn't require effluent data
- OEPA processing time is reduced, allowing quicker review time
- Permit consistency with other similar facilities
- Permit requirements are available prior to applying
- Annual discharge fee may not apply

DISCHARGES NOT COVERED BY HYDROSTATIC TEST GP

- Discharges associated with storm water.
- Discharges associated with petroleum corrective actions.
- Discharges associated with temporary discharges besides hydrotesting.
- Discharges containing pollutants classified as biocides (except chlorine) and any other chemical.
- Discharges containing pollutants classified as bio-accumulative chemicals (mercury).
- Discharges that are co-mingled with hazardous waste or hazardous substances.
- Discharges to combined or sanitary sewer systems.

APPLYING FOR GP COVERAGE – NOTICE OF INTENT (NOI) APPLICATION

- Application is on the OEPA web site
- Submit NOI signed by a Responsible Corporate/Company Officer.
- Include topographic map indicating location of discharge(s)
- \$200 application fee.
- One NOI can be submitted for multiple discharges on the same stretch of pipeline
- Review time takes approximately 3 to 4 weeks
- Must receive letter from OEPA indicating approval under the GP before discharge. If not approved under the GP, then an Individual Permit will be required for the discharge.

GP EFFLUENT LIMITS

- General Permits specify effluent limitations for new and used pipe (Reference Part III A and Part III B of the GP)
http://www.epa.ohio.gov/portals/35/permits/HydrostaticTestWater_Final_GP_oct07.pdf
- Pay close attention to Chlorine and Total Suspended Solid Limits.
- Limits for the discharge of test water from used pipe are very difficult to meet without some type of treatment. BTEX levels are the most difficult to meet for used pipe. Strong consideration should be given to shipping water off site for disposal.
- If effluent limit exceeded, OEPA must be contacted within 24 hours, and a Notice Of Violation will likely be issued.

GP REPORTING AND TERMINATION

Data Reporting

- Sampling data must be submitted to OEPA no later than the 25th day of the next month
- Submitted on OEPA form 4500 or electronically through OEPA's eBusiness Center

Notice of Termination

- Submitted when the test discharge(s) are completed
- Form can be found on web page

GP DISCHARGE SET UP AND BMP'S

Keys to Compliant Discharges

- Proper planning and location
 - Use of Best Management Practices (BMPs)
 - Controlled Release Velocity
 - Communication between contractor and inspectors
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- Use low chlorinated water or non-chlorinated water if possible; de-chlorination is dependent upon temperature and exposure time to the atmosphere; chlorine testing must be done in the field
 - Controlled flow rate (recommended 500 gpm or less)
 - Variety of set-ups for the discharge for controlling the release of sediments
 - Control erosion
 - Re-use water as much as possible if project will have multiple discharges (Caution - pipe solids can accumulate through re-use)

COMMON BMPs

Filter bag with geo-textile to control sediment load



Dewatering pit to control sediment and velocity



COMMON BMPs

Filter socks with flocculent



Straw bale check dam



VELOCITY CONTROL

Split discharges to control volume and velocity



BMPs (Continued)

Low turbidity of water downstream of BMPs

High effectiveness of BMPs leads to compliance



NO DISCHARGE PERMIT NEEDED

- Where available, getting approval from municipal sanitary system to discharge into their system avoids need for GP or Individual Discharge Permits.
- Slow and low volume discharges to flat areas where you are certain the discharge will not reach stream, wetland, or groundwater table avoids need for GP or Individual Discharge permits. This usually is difficult to ensure.

CONCLUSIONS

- When discharging hydrostatic test water, there are three compliance options: (a) General Permit, (b) Individual Permit, and (c) avoiding both.
- Most discharges can be done under the General Permit.
- Pre-approved discharges into sanitary system avoids need for permit.
- Discharges that do not reach “waters of the state” do not need a discharge permit, but this is difficult to ensure.
- The options of last resort are to obtain an Individual Discharge Permit or haul the water to an approved disposal facility.
- Use appropriate BMP’s to ensure compliance with discharge permit requirements.