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MSD

February 2, 2000

[Recipient Name]

[Company Name]

[Address]

[City, State/Province Zip/Postal Code]

Re: Jeffersontown/Chenoweth Run Pilot XL Project

Dear [Recipient]:

Enclosed please find a brief summary of the March 2, 2000 Work Group meeting. Also, please note that **the next Work Group meeting is scheduled for Thursday March 30, 2000** at 4:00 at the Jeffersontown Public Library. We will discuss proposed Performance Measures at that meeting.

Anyone wishing to participate in work group meetings, please let me know. Or if you have any other questions, please contact me at 540-6464 or worley@msdlouky.org.

Sincerely,

Sharon Worley, P.E.
Technical Services Engineer

[Typist's initials]

[File ID]

[Enclosure/s]

cc: project xl – stakeholder file

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Jeffersontown/Chenoweth Run – XL Pilot Project Stakeholder Meeting Summary

Date: March 2, 2000 (4:00 – 6:10pm @ Jeffersontown Public Library)

Attendees: Jeff Frank (Vanguard Sales, Audubon Society), Richard Meisenhelder (KPPC), Allan Bryant (DOW), Steve Stahl (Beechmont Press), Richard Jenkins (United Catalysts), Mark Sneve (Strand Associates), Sue Green and Sharon Worley (MSD).

Summary Notes prepared by: Sharon Worley

The following is a general summary of key discussion topics. It is not intended that every comment or suggestion is necessarily captured herein. Meeting agenda and review documents (copies available on request) were distributed in advance of the meeting. Additional copies were available at the meeting.

Update and Overview – Sharon Worley reviewed meeting rules, basis for consensus decision, and meeting schedule. It was agreed that future work group meetings would be held 4:00 – 6:00pm at J-Town Public Library at the dates listed on the attached schedule. Meeting agendas will be sent to the work group prior to each meeting and meeting summaries will be distributed after the meetings.

Draft Performance Measures – The group reviewed a draft copy of the “Proposed J-Town Pretreatment Performance Measures” summary document. The proposed performance measures will be discussed in greater detail at the next meeting. A couple of key suggestions, however, were offered:

- Coordination of biomonitoring and the full sampling of treatment plant and collection system should be considered.
- The collection of samples from all 6 trunklines rather than just from 4 should be considered.
- Phosphorous should be added as a monitoring parameter.

Proposed Regulatory Revisions – The group reviewed a draft copy of the “Proposed Regulatory Revisions”. Several key suggestions were made:

Significant Industrial User definition.

- One of the screening criteria for the industries is that they would reinvest a minimum of 50% of savings (from reduced monitoring, etc.) into a Stakeholder approved environmental program. It was suggested that resources be pooled toward 1 or 2 significant environmental programs.
- The frequency of determination of SIU status should be clarified.
- Change “good waste management programs” to “effective waste management programs”.
- Eliminate “allowable” from “...5% or more of the allowable treatment plant influent mass loading...”

Significant Non-Compliance definition.

- Technical Review Criteria was discussed but no conclusions were reached.
- It was suggested to keep the current 30 days rather than modifying to 45 days for report submittal.

Pollutants Not Present.

- All agreed that it makes sense to only require categorical facilities to monitor for pollutants expected to be present. Although a regulatory revision would not be necessary, this same philosophy can be applied to non-Categorical facilities also.

General.

- Since this project has the potential to be expanded to other municipalities (future), screening criteria for eligible POTWs should be developed. At minimum, POTWs would have to demonstrate the ability to collect sufficient data to monitor for and meet environmental performance measures.
- It was suggested that the provisions be reviewed to ensure that if the program were implemented by others, that it would be fully protective of the environment in all applications.
- Following the meeting, it was proposed that the TRC be changed to apply only to daily maximum limit (but not the average limit). Additionally, it was proposed that:
 - When a violation occurs, the six month evaluation period should start with that month (thus avoiding the confusion of rolling quarters); and,
 - Acute violations (as calculated by TRC) should apply only to pollutants of concern as determined by site specific evaluation of environmental risk.

Conclusion.

The proposed regulatory revisions document will be modified as discussed above and submitted to EPA.

