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January 18, 2020

Re: Virginia Pollutant Discharge Elimination System Permit – Wastewater/Stormwater
(VA0001961) Comment and Request for Public Hearing

Jason Dameron
DEQ - Valley Regional Office
4411 Early Road
P.O. Box 3000
Harrisonburg, VA 22801

On behalf of the citizens of Page County and at the request of the Page County Board of Supervisors at the January 14, 2020 Work Session, as Chairman At-Large of the Page County Board of Supervisors, I respectfully offer comments on the proposed reissuance of Virginia Pollutant Discharge Elimination System Permit – Wastewater/Stormwater (VA0001961). I also request the opportunity to present the following concerns at a public hearing on the matter, in order to ensure a clear public record that substantial concern about the permit's relevance and possible negative impact has been placed before the DEQ on behalf of the Board and Page County citizens, prior to any final deliberation and/or decision on the matter.

To allow this wastewater treatment and release permit to be reissued without a public hearing seems to disregard clear and relevant facts. There is no viable Pollutant Discharge Elimination System in place at the Alma recycling property, nor is there any evidence that the existing Pollutant Discharge Elimination System has been maintained, monitored or exercised in more than a decade. The former poultry plant water treatment facility is clearly derelict, unmanned, and in obvious disrepair. Several complaints concerning the recycling facility, from adjacent homeowners and the DEQ, relate to rainwater run-off contaminated by industrial recycling matter, the solution to which has been to re-direct contaminated rainwater run-off away from neighboring properties and roadway toward the abandoned water treatment primary cistern and subsequent lagoons, where such contaminants and wastewater remain. This is related to our concerns about reissuance of a wastewater permit at Alma (VA0001961), in that it is clear that no viable Pollutant Discharge Elimination System capability currently exists at Alma.

Our concerns are regarding the Permit, not the recycling plant, which is a benefit to the County. The magnitude of permitted discharge at Alma, 1.0 million gallons per day, also requires that our comments be heard. The facility permit cites 9 VAC 25-820, relative to "Regulation for Nitrogen, Phosphorus and Nutrient Trading in the Chesapeake Bay Watershed (WPG)" specific

to poultry processing at Alma, not industrial recycling of metals, plastics, and petroleum by-products. The Project Description in the Public Notice fails to enumerate *any* pollutant other than those typical to poultry processing. The catch-all “industrial solids” in the Project Description provides no definition whatsoever to pertinent treatment of wastewater from an industrial recycling operation. Actual solids washed from the auto and industrial recycling process would overwhelm the “on-site lagoons” in short order and, regardless, would not match specific pollutant discharge elimination features of the poultry processing permit being considered for reissuance.

On that note, the permit reissuance application’s indication of possible future poultry processing is beyond credibility, and would require a renovated plant, an up-to-date and viable pollutant discharge elimination system, as well as a new and pertinent permit. However, for today’s discussion, and given the massive 1.0 million gallons daily permitted discharge of treated wastewater in the permit (VA0001961), the slightest possibility of wastewater transport from other locations for release into the Shenandoah River at Alma represents a frightful liability to the County and downstream.

Despite DEQ citations for incidents and violations at the Alma recycling plant, we certainly benefit from having the recycling operation in Page County. However, the wastewater permit (VA0001961) seems largely irrelevant to the recycling operation and, at a minimum, requires a viable Pollutant Discharge Elimination System and protocol in place, without which the permit clearly reflects potential for liability to the citizens of Page County.

We appreciate the opportunity to present our concerns, and respectfully request a public hearing, to establish public record regarding potential for environmental damage at Alma, downriver Page County, and beyond.

With kindest regards,

Morgan Phenix, Chairman At-Large
Page County Board of Supervisors

c. Amity Moler, Page County Administrator
Nathan Miller, County Attorney
D. Keith Guzy, Jr. - District 1
Allen Louderback - District 2
Mark Stroupe - District 3
Larry Foltz - District 4
Jeff Vaughan - District 5