

## Wade Murphy

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**From:** Wade Murphy  
**Sent:** Friday, October 21, 2022 5:23 PM  
**To:** Bill Tucker  
**Subject:** RE: [EXTERNAL] Draft RMC Permit

Good afternoon Mr. Tucker. Thank you for your comment on the draft permit. I'll need to consult with staff who prepared the draft permit and others who have past experience interpreting this language before providing you an answer. We will also consider/address this concern in the final permit issue since you may not be the only one with the question. Thank you for participating in the permitting process.



**Wade D. Murphy** | E.I.  
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**From:** Bill Tucker <tuckerbill2020@gmail.com>  
**Sent:** Friday, October 21, 2022 4:49 PM  
**To:** Wade Murphy <Wade.Murphy@tn.gov>  
**Subject:** [EXTERNAL] Draft RMC Permit

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Mr. Murphy,

The attached excerpt of the draft RCMP mentions the absence of a discharge within a given month (Section 5.1, para. 5) and reporting of same to the Division. If there is a monthly monitoring or reporting obligation, could you please clarify. It was my understanding that discharges of process water were subject to quarterly monitoring and reporting.

Regards,  
Bill

Tucker Consulting, LLC  
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Brentwood, TN 37027  
615-476-9078

## PART 5

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### 5. MONITORING REQUIREMENTS

#### 5.1. PROCESS WASTEWATER MONITORING REQUIREMENTS

The permittee must monitor the treated wastewater for the parameters set forth in Part 4 of this permit. The monitoring frequency for these parameters shall be quarterly. For the purposes of this permit, quarters are defined as calendar quarters: January through March, April through June, July through September, and October through December. Monitoring frequency for any and all parameters may be changed at the discretion of the director. Changes to the monitoring frequency will be communicated in writing.

Monitoring process wastewater shall be performed in dry weather, when the dilution effect of stormwater is minimal.

For reporting purposes, the flow value reported shall be the total volume discharged in a one day period in units of million gallons per day (MGD). The permittee may estimate the flow rate, through the use of recognized conventional flow equations; for example, cross-sectional area, surface speed and distance traveled of a float, and estimated friction loss (80%) as in:

$$\frac{A \text{ [ft}^2\text{]} * D \text{ [ft]} * 0.646 * 0.8}{T \text{ [sec]}} = Q \text{ [MGD]}$$

If the division determines that a discharge will not accurately be characterized by grab samples, the division may require the permittee to sample by composite sample. This requirement shall be given by a written notice to the permittee.

Monitoring at facilities shall be required only during monitoring periods in which a discharge occurs. During a month in which no discharge occurs, the permittee must indicate "No Discharge," sign it and submit it to the division

The division may require the permittee to sample for additional parameters, by either grab or composite sample. This requirement shall be given by a written notice to the permittee.

#### 5.2. STORMWATER MONITORING REQUIREMENTS

The frequency of monitoring shall be once per calendar year for all parameters. The first monitoring period shall be calendar year 2023. Permittees shall collect a sample of stormwater runoff and run the appropriate tests for the following parameters: