

Ohio Environmental Protection Agency

Fact Sheet For

National Pollutant Discharge Elimination System (NPDES)

General Permit for Discharges of  
Hydrostatic Test Water

I. **Background**

The Federal Water Pollution Control Act [also referred to as the Clean Water Act (CWA)] and the Ohio Water Pollution Control Act (Ohio Revised Code Section 6111.04), provide that the discharge of pollutants to waters of the State from any point source is unlawful, unless the discharge is in compliance with a NPDES permit. Sometimes facilities in Ohio have the need to discharge hydrostatic test water for limited duration.

Hydrostatic test water means water placed in pipelines, tanks, etc. (new/unused or used) and raised to greater than atmospheric pressure in order to check for leaks and /or the structural integrity of these facilities. Hydrostatic test water also includes tank and pipelines filled with water to test for leaks without raising pressure to above atmospheric pressure. Discharges of hydrostatic test water generally take place from new facilities, unused facilities, and from used facilities that have been used for the transportation or storage of natural gas, crude oil, or liquid or gaseous petroleum hydrocarbons. These facilities include, but are not limited to, pipelines and storage tanks.

Ohio EPA has elected to issue a statewide general permit to cover these facilities discharging hydrostatic test water to waters of the State.

The conditions under the heading "eligibility" are very important because they provide an explanation of what type of discharges are and are not covered by this general permit. The general permit imposes effluent limitations and monitoring requirements based on new/unused or used facilities for hydrostatic test water. The permit requirements for used facilities are different from new/unused facilities.

This permit would be a renewal of the current general permit; it is subject to the requirements of Ohio's antidegradation rule (Ohio Administrative Code 3745-1-05) because all discharges covered by this permit are by definition new. The general permit is proposed for a duration of five years.

This permit is a renewal of the current permit for Hydrostatic Test Water, OHH000001. The current permit will be terminated when OHH000002 becomes effective.

II. **Description of General Permit Coverage and Type of Discharge**

The permit will go through antidegradation procedure. The discharges are characterized as hydrostatic test water. The following wastewater discharges associated with hydrostatic test water are not authorized by this permit:

- wastewater discharges that are mixed with any other discharges that are not associated with hydrostatic test water. Storm water that is not related to but is mixed with the discharge from the hydrostatic test water, during wet weather conditions, is not covered by this general permit. Storm water discharges are authorized separately by a storm water general permit;
- wastewater discharges that the Director has determined to be contributing to a potential violation of Ohio's surface Water Quality Standards;
- wastewater discharges that are discharged to combined or sanitary sewer systems;
- wastewater discharges that take place within five-hundred yards upstream of a public water supply surface water intake and cannot meet Ohio's public water supply standards.
- wastewater discharges that are commingled with hazardous wastes or hazardous substances;
- wastewater discharges associated with petroleum-related corrective actions;
- wastewater discharges associated with temporary discharges;
- wastewater discharges containing pollutants classified as bioaccumulative chemicals of concern such as mercury;
- discharges to any receiving water designated Outstanding National Resource Water (ONRW), Outstanding State Water (OSW), Superior High Quality Water (SHQW) or Category 3 wetland, or to receiving waters that discharge into a water with one of these designations within two stream miles of the discharge point; and
- wastewater discharges containing pollutants classified as biocides (except chlorine) and any other added chemicals.

III. **Typical Pollutants, Treatment, Monitoring Requirements, and Permit Limits**

Hydrostatic test water:

Typical pollutants usually present in hydrostatic test water discharge are total suspended solids, total recoverable iron, total residual chlorine, benzene, toluene, ethylbenzene, xylene and floating oil & grease. Parameters like pH and dissolved oxygen that influence effluent chemistry are also regulated.

Monitoring requirement and permit limits have been developed based upon the potential effluent characteristics of new and unused facilities.

In some cases, treatment may not be necessary for some of these discharges. For example, discharges from the hydrostatic testing of new tanks and pipes may contain small amounts of oil that are often used by the manufacturer to prevent corrosion prior to product use. Treatment for such low concentration of oil and grease is usually not required.

In case of hydrostatic testing of used tanks and pipelines that previously transported liquid petroleum products will likely contain high levels of oil and grease that require treatment.

Oxygen depleting compounds such as sodium sulfite are often used in the test water to protect against corrosion inside the tanks and pipelines. This may result in depletion of dissolved oxygen in the discharge resulting in need for oxygenation to avoid potential impacts in the receiving waters. This is true for both new and used facilities.

Since public water supply (which contain significant residual chlorine) or surface water (with chlorine added for disinfection) is used for testing of these facilities, dechlorination either by treatment or dissipation may be needed to meet water quality standards in the discharge. Discoloration in the discharge may result from corrosion. It can be regulated by iron monitoring.

Monitoring requirements and permit limits are to be selected from the two effluent tables (under A or B) in Part III of the general permit based on new or used facilities. It is therefore essential for the applicant to explain clearly in the Notice of Intent (NOI) whether the discharge is from new/unused pipes/tanks or from used pipes/tanks.

#### IV. **Description of Permit Conditions**

**Notice of Intent** - Operators of facilities with the industrial activities described in Section II of the general NPDES permit must obtain a permit to discharge. Each individual facility must submit a Notice of Intent (NOI) to obtain coverage under the general permit. Ohio EPA's regulations (OAC Rule 3745-38-06) exclude persons covered by general permits from requirements to submit an individual application. NOI requirements are intended to establish a mechanism that can be used to establish a clear accounting of the number of permittees covered by the general permit, their identities, locations, mailing addresses, and nature of discharge.

To obtain general permit coverage, a discharger needs to complete and submit an NOI form that is available from Ohio EPA, along with the appropriate fee, to the following address:

Ohio Environmental Protection Agency  
Office of Fiscal Administration  
PO Box 1049  
Columbus, Ohio 43216-1049

Permit coverage does not become effective until the permittee receives written notification from the Director that coverage is granted.

V. **Effluent Limitations and Monitoring Requirements**

Effluent limitations and monitoring requirements are based on Ohio's WQS (Water Quality Standards), BPJ (Best Professional Judgment, and BADCT (Best Available Demonstrated Control Technology).

The following two tables list the required monitoring parameters and applicable effluent limitations for new/unused pipes and tanks and used pipes and tanks respectively.

Hydrostatic test water discharge from new/unused pipes and tanks						
Parameter	Concentration			Sampling Type	Frequency	Limit Justification
	Maximum	Minimum	Monthly			
Flow Rate (GPD)	-	-	-	24 Hr. Total Estimate	1/month	-
Dissolved Oxygen (mg/L)	-	-	-	Grab	1/month	-
pH (S.U.)	9.0	6.5	-	Grab	1/month	WQS
Total Suspended Solids (mg/L)	45	-	30	Composite	1/month	BPJ
Oil and Grease, Total (mg/L)	10	-	-	Grab	1/month	WQS
Iron, Total Recoverable (ug/L)	-	-	-	Composite	1/month	-
Chlorine, Total Residual (mg/L)	0.019	-	-	Grab	1/month	WQS

Hydrostatic test water discharge from used pipes and tanks						
Parameter	Concentration			Sampling Type	Frequency	Limit Justification
	Maximum	Minimum	Monthly			
Flow Rate (GPD)	-	-	-	24 Hr. Total Estimate	1/month	-
Dissolved Oxygen (mg/L)	-	-	-	Grab	1/month	-
pH (S.U.)	9.0	6.5	-	Grab	1/month	WQS
Total Suspended Solids (mg/L)	45	-	30	Composite	1/month	BPJ
Oil and Grease, Total (mg/L)	10	-	-	Grab	1/month	WQS
Iron, Total Recoverable (ug/L)	-	-	-	Composite	1/month	-
Toluene (ug/L)	5	-	-	Grab	1/month	BADCT
Benzene (ug/L)	5	-	-	Grab	1/month	BADCT
Ethylbenzene (ug/L)	5	-	-	Grab	1/month	BADCT
Chlorine, Total Residual (mg/L)	0.019	-	-	Grab	1/month	WQS
Xylene, Total (ug/L)	10	-	-	Grab	1/month	BADCT

VI. **Changes from Current Permit**

The standard permit conditions in Part V of the permit have been revised to incorporate the current standard conditions. These affect mostly the REPORTING and NON-COMPLIANCE NOTIFICATION sections.

In the Reporting Section (Part V, L.), Ohio EPA has included electronic reporting instructions for use with the Agency's eDMR self-reporting system. In the Non-Compliance Reporting Section (Part V, S.), Ohio EPA has allowed internet reporting of non-compliance, and provided new phone numbers if the permittee wishes to report by telephone.

The Agency has made minor wording changes to the Transfer Section of the permit (Part V, E.).

The Agency has made minor wording changes to the Discharge Changes Section of the permit (Part V, U.).

The Agency has made minor wording changes to the Hydrostatic Test Water definition in the Definitions section of the permit (Part VI).

The Agency has added the definition of “Composite Sample” in the Definitions section of the permit (Part VI).

VII. **Notice of Termination**

Each individual facility covered by the general permit must submit a Notice of Termination (NOT) form to terminate coverage under this permit. Permittees are to request permit coverage termination once the wastewater discharges are eliminated. Failure to submit an NOT form constitutes a violation of the permit and is a violation of ORC 6111.