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Via Electronic Submission to: www.ahs.dep.pa.gov/eComment

November 16, 2015

Department of Environmental Protection
Bureau of Point and Non-Point Source Management
Rachel Carson State Office Building
P.O. Box 8774
Harrisburg, Pennsylvania 17105-8774

RE: Draft PAG-03 General Permit (3850-PM-BPNPSM0083)

Dominion Resources, Inc. (Dominion) appreciates the opportunity to submit comments on the Pennsylvania Department of Environmental Protection (DEP) draft PAG-03 General Permit for Discharge of Stormwater from Industrial Activity. Dominion is one of the nation's largest producers and transporters of energy, with a portfolio of approximately 24,400 megawatts of generation, 12,200 miles of natural gas transmission, gathering and storage pipeline and 6,490 miles of electric transmission lines. Dominion operates one of the nation's largest natural gas storage systems with 928 billion cubic feet of storage capacity and serves utility and retail energy customers in 14 states.

We operate under the current PAG-03 for one natural gas compressor station and have submitted a Notice of Intent (NOI) for a second natural gas compressor station. The proposed revisions to the PAG-03 would substantially increase monitoring requirements, reporting requirements and compliance costs while reducing the uniformity that a general permit is designed to provide. Below are specific comments on revisions being proposed to the PAG-03.

The current PAG-03 offers the option of conducting an annual site inspection in lieu of annual discharge monitoring. The proposed PAG-03 would remove the alternative compliance mechanism and require discharge monitoring as well as increase the monitoring frequency to once every six months for all discharges. We are not aware of data or compliance issues that warrant the increase in monitoring for all discharges. We request that DEP continue to allow both compliance options (e.g. the annual monitoring or the annual site inspection) as long as the nature of the discharge does not change.

The proposed PAG-03 also establishes benchmark values for particular constituents and includes a requirement to submit a Corrective Action Plan if benchmark values are exceeded during two

consecutive monitoring events. The PAG-03 establishes rigorous Best Management Practices (BMPs) designed to prevent or reduce pollutant loading to surface waters associated with stormwater at industrial facilities. Numeric values do not take into account variability of storm conditions and the exceedance of a benchmark value does not necessarily indicate that BMPs are not functioning or being maintained as designed. Additionally, the requirement of a Corrective Action Plan and a requirement to get approval of the plan reduce the certainty typically associated with a General Permit. We request that the requirement for submittal of a Corrective Action Plan be removed from the final PAG-03.

The proposed PAG-03 includes a requirement for quarterly inspections of the facility and inclusion of the inspection information in the Annual Report. We believe that the existing compliance mechanisms (either the annual discharge monitoring or an associated annual visual inspection) and associated Annual Report are appropriate and adequate. We request that the requirement for quarterly inspections be removed.

We appreciate the opportunity to provide comments regarding the proposed PAG-03 and respectfully request that these comments be considered. If you have any questions, please call me at 804-273-3467 or Jason Ericson at 804-273-3012 (jason.p.ericson@dom.com).

Sincerely,

A handwritten signature in black ink that reads "Pamela F. Faggert". The signature is written in a cursive style with a large initial "P" and "F".

Pamela F. Faggert