



20-CP NPDES General Permit for Stormwater Discharges Associated with Construction Activity

October 13, 2023





AGENDA

- Brief Overview of 20-CP Status
- 20-CP Significant Changes
- Overview of Programmatic Changes for BGE's Environmental Management Unit (EMU)
- McCormick Taylor's Role in Supporting BGE's Transition to 20-CP Compliance
- Q&A Session with MDE
- Open Q&A Session

PRESENTERS



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20-CP General Status Update

- 20-CP became effective April 1, 2023
- All projects covered under the previous permit (14-GP) seeking coverage under the 20-CP should have been submitted for continuation
- MDE's ePermits site automatically terminated coverage for projects not continued on September 30, 2023

New 20-CP Updates and Significant Changes

- Permit Reorganization
- Updated Authorized Discharges
- Technology-Based Limits
 - Includes managing dewatering, implementing pollution prevention measures, and providing stream buffers (Stream Protection Zones)
- Water Quality-Based Limits
 - Controls for sensitive waters (Tier II or impaired streams)
 - Turbidity Benchmark Monitoring
- Stormwater Pollution Prevention Plan (SWPPP) Requirements



BGE's Environmental Management Unit (EMU) Programmatic Changes for the 20-CP

- Tracking of Permit from Draft to Final
 - Evaluate and determine potential effects to BGE Projects/EMU Program
- Development and Distribution of Guidance Documents for Project Designers
 - Requirement to contact DNR if the project is in a Sensitive Species Project Review Area
 - Delineate Stream Protection Zones
 - Review site for contaminated soils using Land Restoration Program (LRP) and Voluntary Cleanup Program (VCP) online resources
 - Consider any SWPPP requirements
- Development and Distribution of SWPPP Template for Preparers
 - Identification of BGE internal guidelines (e.g., prohibiting vehicle washing on BGE sites, requirement for BGE EMU approval for chemical additives)

BGE's Environmental Management Unit (EMU) Programmatic Changes for the 20-CP Cont.

- Administer 20-CP Training to Environmental Contractors of Choice
 - Inspector Training
 - Project Management/Contractor SWPPP Team Training
- Development and Distribution of Guidance Document for NOI Inspectors
 - BGE's Expectations for Inspectors
 - Designate a standard inspection frequency for all BGE projects
 - Distribution of updated inspection form
 - Turbidity benchmark monitoring considerations (e.g., online forms, expectations, etc.)
 - Recordkeeping requirements

BGE Project Updates

- 9 existing projects continued
- 5 existing projects terminated
- 5 new projects submitted and approved

BGE Continuation Projects (14-GP to 20-CP)	
Project Name	Project Type
Downtown Corridor 30" Gas Main	Gas main installation along roadways
Mobile Services	Facility expansion (paved storage facility) with SWM facilities installation
Dares Beach Transmission ROW	Slope failure repair and culvert replacement
Cockeysville Service Center	Facility upgrades that include storage barns, parking lot expansion, and EV charging stations
Conastone to Northwest Substation	230kV conductor replacement
Conastone to NW 230 kV Transmission Conductor Replacement Project	Transmission line conductor replacement
Rock Ridge Duct Bank Project	Installation of concrete encased duct bank along existing transmission line ROW
Windy Edge to Five Forks Transmission Line Reliability Project	Transmission line rebuild
Loch Raven Substation	Demolition of existing subsurface features and installation of new substation



McCormick Taylor's Role for BGE 20-CP Transition Support

- Review of existing BGE projects covered under the 14-GP
- Assist in the development of a BGE SWPPP template and site-specific SWPPPs
- Assist in the development of a BGE SWPPP Training
- Assist with modifying the current BGE 14-GP Inspection Report to incorporate new requirements
- Assist in the development of guidance documents
- Completion of MDE ePermit applications

Lessons Shared and Helpful Tips

- Anticipate longer approval timeframes during transition period
- Thorough review of any applicable exemptions
- Importance of communicating clear concise expectations of the 20-CP to the Project Team
- Increased awareness and attention to detail based on the 20-CP permit requirements
- Roles and responsibilities of the SWPPP team
- Open dialogue – reach out to MDE with questions!

THANK YOU



Questions & Answers



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