Maryland
Department of
the Environment

General Permit for Discharges from Tanks, Pipes, Other Liquid Containment Structures, Dewatering Activities, and Groundwater Remediation

General Discharge Permit Number 17-HT
NPDES Number MDG670000

Maryland-District of Columbia Utilities Association
2018 Environmental Committee Fall Conference
Tuesday, October 2, 2018

Presented By:
Jonathan Rice

Agenda

- Changes from 11-HT Permit
  - New Discharge Types
  - New Permit Format
  - Changes in Requirements/Limitations
- Review of Universal Limitations (all discharges)
- Review of Category Specific Limitations
- Submitting for Coverage

Changes from 11-HT

- Addition of discharges from dewatering activities and groundwater remediation
- Reorganization of permit limitations by "Discharge Categories"
  - Clarification of applicable requirements
  - Simplified approach to finding discharge type
- New chemical additive requirements
- Expansion of Pollution Prevention Plan (PPP)
- Visual monitoring
- Tiered monitoring frequency

Old Permit Format

3. All potential discharge alternatives including disposal into the sanitary sewer,

2. Discharges from Disinfection and Hydrostatic Testing of Pipes, Pipelines, and Tanks and point

B. ***Eligible Discharges***

This permit covers the following discharges:

1. Treated tank bottom wastewater from petroleum (i.e., gasoline, kerosene, fuel oil, 'Number 6 oil' and aviation fuel only) storage tanks to surface waters;

2. Wastewater from the disinfection (only disinfection agents containing bromide or chloride are authorized) or hydrostatic testing of pipes, pipelines or tanks;

3. Wastewater from draining or flushing of fire control systems;

4. Discharges from potable water systems resulting from the overflow, flushing, disinfection, hydrostatic testing, mechanical cleaning, or dewatering of vessels or structures used to store or convey potable water;

5. Untreated "water" in excess of 10,000 gallons per day as a monthly average from water storage or distribution systems, including but not limited to hydrogeologic/aquifer/well head yield-testing; and

6. Storm water discharges from petroleum storage tank containment structures.

or standing water, preventive measures include flow rate control and locating the point of discharge in the receiving water at a sufficient depth to avoid bottom scour.

New Permit Format

Narrative Requirements:

1. ***pH Monitoring*:** For discharges where pH is "REPORT" or monitor-only, you are required to document pH measurements as part of your Pollution Prevention Plan (PPP). Should pH be outside the range of 6.0 to 9.0 for two consecutive weeks, you must implement a corrective action to restore pH to the range specified. All necessary corrective actions shall be documented in the PPP.

2. ***Erosion and Sediment Control*:** Take particular note of Parts III.C.1 and III.C.3 of this permit regarding requirements for management of erosion and sediment. Discharges which cause a noticeable sediment plume in the receiving waters are not permitted. If such a condition is observed, you shall cease discharge as soon as possible and implement a corrective action.

3. ***Organics/Metals Monitoring:*** As part of your application for registration under this general permit, you must indicate if there is any cause for belief that the groundwater to be discharged has a reasonable potential to contain volatile organic compounds, metallic elements, or any other pollutant other than sediment. Any data which you have obtained or know to exist from environmental assessments or well point monitoring must be included as part of your application. If no data is available, the Department will typically require additional monitoring upon commencement of discharge (or before, if accessible). The Department reserves the right to waive this requirement using best professional judgment, if appropriate, based on an analysis of prior land use and other environmental factors in the area.

4. ***Conclusion of Construction Dewatering Activities:*** Once you conclude activities at the site which lead to discharges from dewatering, you may terminate coverage under this permit. Until you terminate coverage, you will continue to be responsible for submission of required discharge monitoring reports via NetDMR, even if you are only reporting "No Discharge."

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elines

sinfecting agent) or
ction does not include

ge monitoring reports and

under this category:

onitoring requency	Sample Type	Notes
Discharge	Measured	(1)
ee Note 2	Grab	(2)
ee Note 2	Grab	(2)

ously used to store oils
l gas):

ample Type	Notes
Grab	(2) (3)

Additional requirements if test or disinfection water is chlorinated or comes from a chlorinated water supply:

Parameter	Daily Maximum	Units	Monitoring Frequency	Sample Type	Notes
Total Residual Chlorine (salt)	13	µg/L	See Note 2	Grab	(2) (3) (4)
Total Residual Chlorine (fresh)	19	µg/L	See Note 2	Grab	(2) (3) (5)

Additional requirements if test or disinfection water is chemically dechlorinated:

Parameter	Daily MINIMUM	Units	Monitoring Frequency	Sample Type	Notes
Dissolved Oxygen (Class I, I-P, II)	5.0	mg/L	See Note 2	Grab	(2) (3) (6)

Universal Permit Limitations

- Erosion and Sediment Control
  - If applicable, following an approved E&SC plan
  - Otherwise, narrative stabilization requirements
  - References MDE's Online E&SC Resources for guidance
- Training/Contractors
  - Specifies that permit holder is responsible
  - Requires maintenance of training records
- Minimum of monthly visual monitoring

Universal Permit Limitations

- Pollution Prevention Plan (PPP)
  - Previously only required for potable water systems
  - Now required for all dischargers with reasonable potential (numeric limits, across land, etc)
  - Treatment plans should have already been in place – this simply requires documentation
  - No specific format required; only contents
- Chemical Additives
  - Narrative best management practices, including documentation in PPP
  - Automatic approval for some additives

Category Specific Limitations

- Discharge Category A: Hydrostatic Testing
  - All discharges have numerical limits for pH and TSS
  - Conditional numerical limits for oil & grease, chlorine, dissolved oxygen (DO), and temperature
  - Tiered monitoring frequency based on volume
  - Narrative requirements for cleaning, appropriations, and treatment system operations (as applicable)
- Discharge Category B: Potable Water Systems
  - Conditional numerical limits for TSS, pH, chlorine, and DO
  - Narrative requirements for PPP and chlorine

Category Specific Limitations

- Discharge Category C: Dewatering
  - Monitoring only for flow and pH, unless potential impact of concrete materials (pH limit)
  - Narrative requirements for pH, E&SC, and organics/metals monitoring
- Discharge Category D: Groundwater Remediation
  - Numeric limits based on contaminants present: pH and various organic materials
  - Narrative requirements for treatment method documentation and additional sampling using EPA Form 3510-2C
  - Tiered monitoring frequency based on volume

Category Specific Limitations

- Discharge Category E: Fire Control Systems
  - Not fire hydrant flushing (Discharge Category B)
  - Numerical and narrative limits for chlorine and temperature
  - Additional temperature requirements for large volumes
- Discharge Category F: Untreated “Water”
  - Temperature monitoring for large volumes
  - Narrative requirements for visual sediment plumes and erosion control (if applicable)

Category Specific Limitations

- Discharge Category G: Tank Bottoms
  - Applies to storage tanks of petroleum-based products only
  - Numeric limits for oil & grease, BTEX, benzene, and TSS
  - Narrative requirement for biomonitoring
- Discharge Category H: Tank Containment SW
  - Numerical limits if spill has occurred
  - Narrative requirements for valved outfall, visual inspections, and spill prevention/response

Submitting for Coverage

- NOI Requirements in Part II.A.1.a of permit
- Permit fee structure adjusted to prevent double-charging of annual fees for renewals
- Existing Permittees
  - Deadline is 6 months after permit effective date
  - Authorization under 11-HT continues in interim
  - Notification will be provided when permit is final
- New Dischargers/Sources: 60 days prior to commencing discharges
- New Owner/Operators: 30 days prior to transfer

Notice of Intent

SECTION VI: Certification

To be completed by a responsible corporate officer, proprietor, general partner, principal executive officer, or ranking elected official or their duly authorized representative, as detailed in Part II.C of the permit.

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Signature/Certifier	Date

Signatory Name/Title: Typed or Printed	Telephone Number

NOI Preparer (Complete if NOI was prepared by someone other than the certifier)

Prepared by:	

Telephone Number	Email Address

Submit completed form and FEE (payable to Maryland Department of the Environment) to:

Maryland Department of the Environment, P.O. Box 2057, Baltimore, MD 21203-2057

☐ Storage tanks contain petroleum-based products . ☐ Storage tanks contain gasoline

Questions???

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Industrial and General Permits Division

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Permit Page Link: **http://clickmeterlink.com/MD-HTGP**