



**Maryland Department of the Environment**

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# **Permitting Update – 17-HT Overview**

**General Permit for Discharges from Tanks,  
Pipes, and Other Containment Structures at  
Facilities other than Oil Terminals  
(17HT / NPDES MDG67)**





# History of NPDES Permit

- The **Clean Water Act** of 1972 (CWA) establishes a comprehensive program
  - “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.”
  - “also seeks to attain ‘water quality which provides for the protection and propagation of fish, shellfish and wildlife.’”



- Discharges into the waters of this State any waste or wastewater regardless of volume requires a National Pollution Discharge Elimination System (NPDES) permit.



# History of Permit

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- Maryland is a delegated State and has authority to issue NPDES permits in 1974.
- EPA approved state of Maryland to issue General Permits in 1990.
- In 1995, Maryland issued the first HT permit.
  - The permit largely provided permit coverage for potable water discharges which contained chlorine.
  - COMAR also included a requirement for a permit for even clean water, if the flow rate exceeded 10,000 GPD as a monthly average.
  - The permit also included discharges from well head testing and reservoir maintenance.
- Over the years, the permit covered many types of discharges of untreated 'clean' water.



# 11HT General Permit

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- Permits **expire every 5 years** and must be re-issued.
- 11-HT was issued in 2012.
- The permit covers 285 operators.
- The permit expired February of 2017, and is administratively extended.



# Changes Requiring Action

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In 2014 Maryland, COMAR was modified to allow dewatering of construction sites, and added discharges of certain ground water discharges which were treated for volatile compounds.

**In 2015, COMAR was modified to no longer require an NPDES permit based solely on flow.**



# Confusion with 11HT

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- Which limits apply to potable water discharges?
- What is a Use III stream?
- What constitutes mechanical cleaning?
- For a once in 5 year discharge, do I need to report monthly?
- What is a discharge from a fire control system....hydrant flushing?
- Do I need a permit to discharge water with an associated water appropriations permit?



# Base Permit vs. Appendix

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Base permit contains common requirements for all dischargers:

- Pollution Prevention Plan
- Testing
- Reporting
- Signatory

Appendix contains Specific Limits or Controls by Discharge Type



# Documentation

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- You must document your plans in a Pollution Prevention Plan (PPP).
- The NOI and PPP are both to be provided to MDE to get coverage.
- You must maintain your PPP on-site, updating when necessary as described in the permit.



# Reporting

NEW

- Electronic Reporting (NetDMR) Required
  - We require NetDMR for any numeric or benchmark reporting.
  - There is an “opt out” for hardship cases.



# Proposed Changes

NEW

Discharge types: (order based on number of registrations)

**CATEGORY A: DISINFECTION OR HYDROSTATIC TESTING OF TANKS, PIPES OR PIPELINES**

**CATEGORY B: DISCHARGES FROM POTABLE WATER SYSTEMS**

**CATEGORY C: DEWATERING FROM CONSTRUCTION ACTIVITIES**

**CATEGORY D: GROUNDWATER REMEDIATION**

**CATEGORY E: DRAINING OR FLUSHING OF FIRE CONTROL SYSTEMS**

**CATEGORY F: UNTREATED “WATER” DISCHARGES**

**CATEGORY G: TANK BOTTOM WASTEWATER**

**CATEGORY H: STORMWATER DISCHARGES FROM ABOVEGROUND PETROLEUM TANK CONTAINMENT**



# Disinfection or Hydrostatic Testing of Tanks, Pipes or Pipelines

Wastewater from the disinfection **(only disinfection agents containing bromide or chloride are authorized)** or hydrostatic testing of pipes, pipelines or tanks, excluding sources from potable water systems;

Primarily pipelines.

Columbia Gas Transmission is proposing to install a new 21.3 mile underground natural gas pipeline between Owings Mills and Fallston, mostly following the route of an existing line, but cutting a wider swath. The route goes past properties in the Beaverbrook development, where Sen. Robert A. Zirkin lives.



SOURCE: FERC, ESRI

NICK TANN, BALTIMORE SUN GRAPHIC





# Discharges From Potable Water Systems

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.





# Flushing of Fire Hydrants

Included as part of Discharge  
Category B (Potable Water Systems)



Can be part of local fire marshal testing to  
ensure sufficient pressure for fighting fires.

Occurs to ensure quality water is  
delivered to residents of Maryland.  
Reason includes occurrence of colored  
water, or areas of low chlorine.





# Dewatering from Construction Activities

When is this required?

What is required?





# Groundwater Remediation

NEW

Remediated groundwater, including that resulting from foundation drainage, which has been treated to remove organic compounds or metals by air stripping, air sparging, activated carbon absorption, or equivalently treated wastewater from groundwater remediation sites not covered by the General Discharge Permit of Treated Ground Water From Oil Contaminated Ground Water Sources to Surface or Ground Waters of the State.

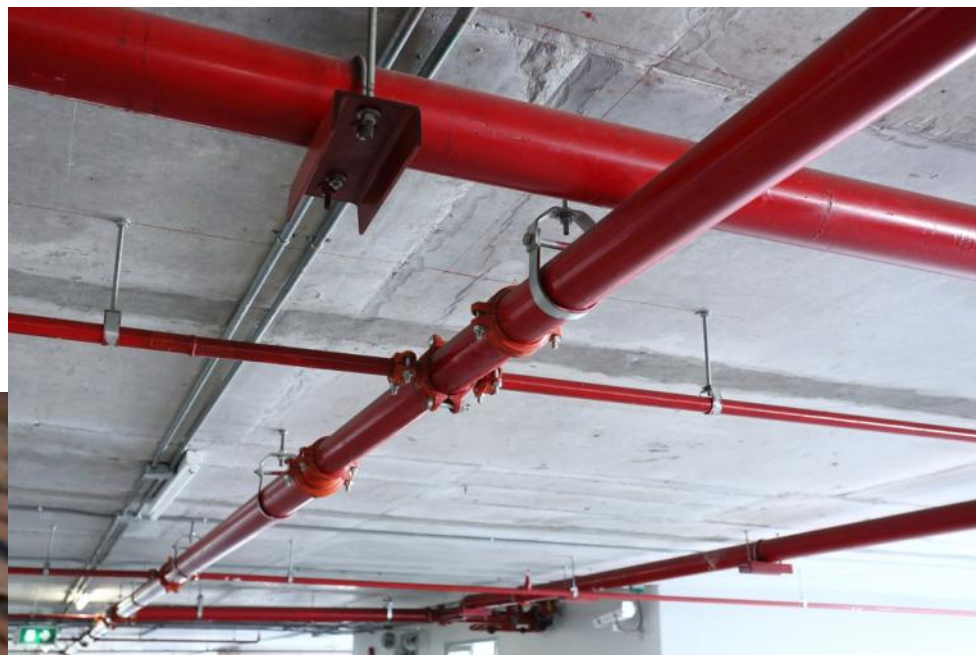




# Draining or Flushing of Fire Control Systems

Is this just hydrant flushing?

**NO!** In fact, hydrant flushing isn't even included here!!!





# Untreated “Water” Discharges

Untreated “water” from water storage or distribution systems, including but not limited to hydrogeologic/aquifer/well head yield-testing; where the effluent flow is greater 100,000 gallons for a single discharge event or greater than half the flow of the receiving stream.





# Tank Bottom Wastewater

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





# Stormwater Discharges from Aboveground Petroleum Tank Containment

Stormwater discharges from petroleum storage tank containment structures.





# Other Permitted Discharges

NEW

- Water used to fight active fires (not from fire system cleaning or testing),
- Pavement wash waters where no detergents are used and no spills or leaks of toxic or hazardous materials have occurred (unless all spilled material has been removed);
- Landscape watering, only if all pesticides, herbicides, and fertilizer have been applied in accordance with the approved labeling;
- Routine external building wash down that does not use detergents and any dislodged paint chips are filtered;
- Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation drainage;
- Uncontaminated ground water or spring water;
- Foundation or footing drains where flows are not contaminated with process materials; and
- Emergency discharges of potable water



# Polymer or Chemical Use

NEW

- Cationic Polymers require approval.
- All other additives require notification that the operator use Safety Data Sheet (SDS) to verify no toxicity.

“Use of any chemical additives (defined in Appendix B) requires prior notice, indicating your intent to use them on your NOI and listing the additives in your PPP. In addition, the use of any cationic chemical additives that will mix with stormwater or that might otherwise become part of the effluent discharged, is prohibited without prior approval pursuant to Part III.C.3 of this permit Any substances not approved by the Department are prohibited.”



# NOI Format Change

NEW

- Formatting the NOI in this way allows MDE to quickly provide coverage, and quickly facilitate modifications in coverage.
- The Department will provide a customized registration letter, that provides actual limits or benchmarks required by each outfall. This will ease understanding of how the permit applies to the facility.

Reports (NetDMRs) (see Permit Part V.B.4).

The facility is registered for the following discharges:

#### Outfall Specific Benchmark Monitoring and/or Limits for Outfall 001:

Your registration is subject to Benchmark Monitoring and Numeric Limits as specified below. If you need to update these, send in an updated NOI and a new registration letter will be provided.

**Table E-2 Subsector E2 Benchmarks (Concrete and Gypsum Product Manufacturers SIC 3271-3275)**

PARAMETER	Benchmark	Units	Frequency	Sample Type
Total Suspended Solids (TSS)	100	mg/L	1/quarter	Grab

**Table E-4 Numeric Limits for Concrete Washout from Concrete Mixer Trucks, Moulds, or Equipment**

PARAMETER	Limits		UNITS	Monitoring Frequency	Sample Type
	Monthly Average	Daily Maximum			
Flow	REPORT	REPORT	gpd	1/month	measured
pH	6.5-8.5	6.0-9.0	s.u.		grab
Total Suspended Solids (TSS)	30	60	mg/L		
Oil & Grease		15 <sup>(a)</sup>	mg/L		

No visible sheen is permissible on any water discharging from the facility.

(a) Pertains to SIC 3272 concrete plants using molds

#### Outfall Specific Benchmark Monitoring and/or Limits for Outfall 002:

Your registration is subject to Benchmark Monitoring and Numeric Limits as specified below. If you need to update these, send in an updated NOI and a new registration letter will be provided.

**Table E-2 Subsector E2 Benchmarks (Concrete and Gypsum Product Manufacturers SIC 3271-3275)**

PARAMETER	Benchmark	Units	Frequency	Sample Type
Total Suspended Solids (TSS)	100	mg/L	1/quarter	Grab

The most recent version of Title 40CFR, Part 136 – “Guidelines Establishing Test Procedures for Analysis



# Questions

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