MARYLAND DEPARTMENT OF THE ENVIRONMENT
Water and Science Administration
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FACT SHEET

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

General Discharge Permit Number: 25HTXXXX
NPDES Number: MDG67XXXX

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SUMMARY OF SIGNFICANT CHANGES FROM THE 17-HT

1. Requirement for all discharge categories covered under the permit to include a pollution prevention plan.
2. Category D has been updated to include remediation of metals.
3. Category E has been updated to include discharges from fire hydrants that are not already connected to potable water systems and covered under category B.
4. Clarifying language on limitations on coverage regarding filter backwash and firefighting foam.
5. Clarifying language regarding notification to the Department if there is an environmental covenant, consent decree, or other agreement related to the site that is applying for discharge coverage.
6. Limitations for PFAS added to Discharge Category D (non-detect levels).
7. Modified monitoring frequency under Discharge Category D.

BACKGROUND

The Clean Water Act (CWA) was originally enacted as the Water Pollution Control Act of 1948 (P.L. 80-845), and amended in 1972 by the Federal Water Pollution Control Act (P.L. 92-500), which established the National Pollutant Discharge Elimination System (NPDES) in Section 402 of the Act.

The 1972 amendments enumerated a set of national goals "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters," which among others included attainment of "water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water" (33 U.S.C. § 1251).

The law became known as the "Clean Water Act" (P.L. 95-217) under amendments to the Act in 1977. The 1977 amendments made it unlawful to discharge any pollutant from a point source into navigable waters without a permit, and gave EPA authority to regulate such discharges by setting limits on the amount of pollutants that can be discharged into a body of water from a permitted source.

Under § 402(b) of the CWA, 40 CFR Part 123, EPA may grant authority (in whole or in part) to individual states to administer the federal NPDES program in that state. The State of Maryland is so authorized. The Code of Maryland Regulations (COMAR) Title 26, Subtitle 08, Chapter 04 requires all discharges of waste or wastewater to surface waters to be authorized under a State discharge permit or NPDES permit. Authorized states are prohibited from adopting standards that are less stringent than those established under the Federal NPDES permit program, but may adopt standards that are more stringent if allowed under state law. The Federal NPDES program under the CWA does not apply to groundwater discharges, therefore discharges to groundwater are regulated under the State discharge permit pursuant to COMAR 26.08.04.01 B(1).

This permit replaces General Permit Number 17HT which became effective on August 1, 2020 and expired July 31, 2025. Currently, the 17HT general permit is administratively continued for facilities covered under that permit at the time it expired. As of 2025 over 350 Maryland facilities are registered under the 17HT permit.

General Permit 25 HT regulates its discharges pursuant to COMAR 26.08.04.09 K(2) which stipulates that coverage includes:

- Treated tank bottom wastewater from storage tanks used only for gasoline, kerosene, fuel oil, no.6 oil, or aviation fuel to surface waters;
- Wastewater from the flushing or hydrostatic testing of pipes, pipelines, or tanks, or wastewater from pipeline infiltration;
- Water in excess of 10,000 gallons per day as a monthly average from the overflow, flushing, or dewatering of reservoirs, tanks, or pipelines used for the storage or delivery of untreated water;
- Wastewater from cleaning or dewatering of vessels or structures used to store or convey potable water;
- Storm water discharges from storage tank containment structures;
- Emergency discharges of potable water;
- Extracted water from an aquifer test;
- Wastewater from construction dewatering;
- Foundation drainage which has been treated for any contaminants; and
- Air stripping, activated carbon adsorption, 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.

The permit provides coverage for potable (chlorinated) water discharges, dewatering of reservoirs, dewatering of certain storm water containment or excavations, water used for hydrostatic testing of pipes or tanks, discharges of fire suppression systems, as well as coverage for certain contaminated groundwater discharges, including new coverage for metal remediation. Each of these is further described below. As a General Permit, the application process includes completion of a Notice of Intent (NOI) and following the process as described below.

PART I: PERMIT APPLICABILITY

Part I of the permit identifies eligible and ineligible discharges under the permit, as do all of the Department's general permits. Other than a minor format change and the changes identified below, the 25HT permit remains unchanged from the 17HT permit.

Part I.B lists the types of discharge which may be covered by the 25HT. The 25HT identifies specific "Discharge Categories" to describe eligible discharges and to clarify requirements in subsequent sections. Discharge categories under this section are ordered from the most common to the least common.

PART II: AUTHORIZATION UNDER THIS PERMIT

This part clarifies what is required to apply for coverage. The terms of Part II remain largely unchanged from the information that was required to apply for the 17HT.

PART III: SPECIAL CONDITIONS FOR DISCHARGES

This part addresses basic special conditions that apply to all categories of discharges. Part III, Section A has been carried over from the 17HT permit. Part III, Section B is also carried over from the 17HT, referring the permittees to Appendix A for guidelines and limitations specific to each discharge category.

Part III, Section C addresses common constraints. These are narrative requirements that the Department has determined are applicable for consideration in all of the discharge categories. By including those requirements here, they don't need to be repeated in each of the sections of Appendix A. Each requirement is rationalized below:

1) *Erosion and Sediment Control*: Any type of discharge may have the potential to cause erosion and/or sediment concerns if the outfalls are not established in the proper manner. This condition simply carries over requirements that were specified in the previous HT permit. Specifically, the condition refers permittees to a manual provided by the Department's Sediment, Storm water, and Dam Safety Division which also provides guidance to those requiring permits from that program.

2) *Pollution Prevention Plan*: All facilities are now required to create a pollution prevention plan (PPP) for all discharges regulated by this permit. This was always required for any discharges which are subject to numeric effluent limitations, may pollute via erosion (discharges across land), or have a reasonable potential to cause an in-stream exceedance of a water quality standard. For this renewal, the Department has determined that all permittees should prepare a PPP to ensure facilities are thinking about and documenting how they intend to meet permit requirements in advance of discharging. This requirement should promote more consistent treatment of discharges and improve treatment efficacy.

In addition to detailing how the permittee plans to meet permit limitations, it will also be required for the PPP to list any treatment chemicals and their Safety Data Sheets to allow for quick and easy reference in the event of a problem. Permittees will also be required to document any lapses in their pollution controls, in order to help prevent such errors in future discharges. Appendix A includes specific items to be included in a PPP, broken down by Discharge Category.

3) *Training/Contractors*: The training portion requires that the permittee train any personnel working on site in the methods being used for pollution prevention. Training records shall be maintained as part of the facility PPP.

Continued from the previous permit, the 25-HT specifically identifies that the permittee is responsible for determining whether to allow a contractor to operate under their permit registration or obtain separate coverage. Terms of either arrangement should be clear in any agreement between parties. If a contractor is allowed to operate under a permittee's registration, it is the permittee's responsibility to ensure all contractor staff is properly trained (and documented as such) and made aware of all permit requirements. The Department will assume that the permittee is at fault for any noncompliance unless a separate agreement between parties indicates otherwise.

4) *Chemical Additives*: In order to meet permit limitations, permittees may desire to use chemical additives as part of their treatment process, most commonly for sediment control. Based on the rationale from the factsheet of the Department's *General Permit for Discharges from Mineral Mines, Quarries, Borrow Pits, and Concrete and Asphalt Plants* (15-MM), which also references EPA's 2012 Construction General Permit (CGP), it has been determined that the use of anionic polymers, flocculants, and other

sediment controlling chemicals may be used subject solely to notification requirements. However, additional requirements shall be required to use cationic polymers, including submission of Safety Data Sheets and a justification that the chemicals will not cause aquatic toxicity or a violation of water quality standards if used as proposed. For more details on this analysis, please refer to the factsheet for the 15-MM permit.

5) *Visual Inspection of Discharges*: This condition aligns with terms found in all of the Department's individual NPDES permits and several of its general permits as well. Essentially, it requires notification be provided in the event that a permittee observes oil sheen, floating solids, or persistent foam in its discharges.

PART IV: MONITORING AND REPORTING

Part IV of the 25-HT permit specifies requirements for how to monitor discharges, data recording and retention, submission of testing results, and instructions to follow if a permit noncompliance occurs. This entire section is relatively standard across all of the Department's general NPDES permits and has been carried over verbatim from the 17-HT. On October 22, 2015, EPA published the NPDES Electronic Reporting Rule to modernize Clean Water Act reporting. As a result, this permit requires the submission of all reports electronically via EPA's (and MDE's) reporting website, NetDMR. The Department has included its standard language regarding this requirement, which is shared among all of its NPDES permits. More information regarding this rule can be found at www.epa.gov/compliance/npdes-ereporting.

PART V: STANDARD PERMIT CONDITIONS

The standard permit conditions have been organized to be consistent with the recently issued general permits by the Department. There have been no substantial changes to the language of these conditions from the 17-HT permit.

PART VI: AUTHORITY TO ISSUE GENERAL NPDES PERMITS

This section identifies the statutes which provide authority for the Department to issue this and all other general NPDES permits. Language has been unchanged from the 17-HT.

APPENDIX A: SPECIFIC REQUIREMENTS FOR DISCHARGE CATEGORIES

This Appendix is meant to organize the HT clearly for both the operator and inspector. Therefore, the Department has split the types of permissible discharges under this permit into eight categories, defined as Discharge Category A through H. Limitations and monitoring requirements (both numeric and narrative) which are applicable specifically to each Discharge Category have been assembled and presented in Appendix A. The rationale below, however, will look at numeric limitations separated by parameter – as

the rationales are often the same across all discharges. Similarly, narrative requirements will be rationalized by the actual requirement.

Numerical Limitations/Monitoring

Flow: All of the Department's NPDES permits require monitoring for flow. There are no numerical limitations for flow in this permit, but actual flow shall be used to determine annual permit fees if applicable. In lieu of measured flow, the permittee may also provide monitoring via flow estimation, pursuant to the terms of Part IV.A.2 of the permit.

Additionally, for Discharge Category F (Untreated "Water" Discharges), the Department has included two flow thresholds which trigger a requirement for coverage under this permit: 100,000 gallons per day as a monthly average or flow which will comprise more than half of its receiving stream. These thresholds have been established based on best professional judgment (BPJ) because large volumes of water in storage may have thermal impacts on the receiving stream. The Department also specifies that it may choose to require coverage for any such type of discharge regardless of flow, which allows for additional protection of specific streams as needed.

Total Suspended Solids (TSS): The 25HT contains limits for TSS in two different discharge categories: hydrostatic test water and potable water sources (mechanical cleaning only). The limitations have been carried over from the 17HT. Hydrostatic testing may cause sediments and/or scale to be flushed from pipe interiors or sediments which may be present from construction or sediment bearing water supplies. Hydrostatic testing within a potable water system does not represent the same potential for solids pollution, so TSS limits are not applicable to that type of discharge. If mechanical cleaning is done in a potable water system, the entire purpose would be to remove build up from tank or pipeline walls, obviously resulting in a potential sediment concern.

In each of these cases, the limitation is a daily maximum of 60 mg/L, which is a technology-based limit that the Department has established using best professional judgment to represent an achievable treatment level via gravity settling, filtration, or chemically-assisted gravity settling. While there is no water quality standard for TSS, there is a standard for in-stream turbidity. The Department has routinely posited that a limit of 60 mg/L for TSS is stringent enough to meet the criteria for turbidity.

While sediments could also be a concern for construction dewatering, they are regulated by narrative erosion and sediment control requirements. Sediments have not been determined to pose a reasonable potential for the other types of discharge regulated by this permit. However, as in all NPDES permits, no discharge is allowed to cause an exceedance of water quality standards, so should an unexpected sediment occurrence happen, permittees shall remain bound by the aforementioned turbidity standard.

pH: Discharges from hydrostatic testing, potable water systems, construction dewatering, and groundwater remediation for pH adjustment all have the potential to cause pH excursions. In the case of hydrostatic testing, pH concerns may be caused by dechlorination, source water influences, and/or presence of concrete for cleaning or construction. Potable water sources also could be impacted by dechlorination or source water influences. Construction dewatering only requires pH limitations if concrete is being used in the presence of the water being discharged, though monitoring is required in all instances to be sure the groundwater being discharged would not cause pH concerns. Some groundwater

remediation projects are to adjust for pH extremes, so this permit includes a limit for those instances in Discharge Category D.

The limit in all cases is a range of 6.0 to 9.0 which represents a technology standard found in numerical effluent limitation guidelines. The Department has chosen this limitation over the water quality standard range of 6.5 to 8.5 based on the assumption that enough buffering capacity would be present to accommodate for the slight difference between the two ranges. Again, in these instances, narrative permit conditions prevent the permittee from causing an exceedance of water quality standards in the receiving stream, which covers the possibility of an extreme case where 6.0 to 9.0 would not be sufficiently protective.

Oil & Grease (O&G): Any discharge which comes from areas where petroleum-based products are present contains a limit for oil & grease. The daily maximum limitation of 15 mg/L is a historically-used technology-based limitation which was established using best professional judgment to represent an achievable standard for treatment using gravity separation or adsorption. Such limits are included for Discharge Categories A and H.

Total Residual Chlorine (TRC): Any discharge which contains water which has been chlorinated must be subject to a limit for TRC. While the actual permit limit is established based on the numerical water quality standards in COMAR 26.08.02.03-2G(1), language at COMAR 26.08.03.06 requires only that chlorine be reduced to non-detectable levels and specifies that the non-detectable level is 0.1 mg/L. This is included in all relevant sections via footnote.

Dissolved Oxygen (DO): In cases where chemical dechlorination is required for a permittee to meet the chlorine limitation, it is possible for dissolved oxygen to be depressed, particularly if the dechlorinating agent is over applied. As a result, Discharge Categories A and B, for hydrostatic testing and potable water discharges contain a water-quality based limit for DO which is applicable if chemical dechlorination is performed. The limit requires a minimum DO level of 5.0 mg/L for Designated Use Class I, I-P, and II waters and a minimum DO level of 6.0 mg/L for Designated Use Class III, III-P, IV, and IV-P waters based on COMAR 26.08.02.03-3.

Temperature/Temperature Difference: Water fitting into the hydrostatic testing, fire systems, and untreated water categories could potentially represent a temperature concern if the water has been sitting outside obtaining solar heat for a lengthy time or simply because the discharge is very large. For that reason, the Department has established limitations for either temperature or a calculated parameter called "temperature difference." "Temperature difference" has been created for instances when the actual ambient stream temperature does not comply with water quality standards. Rather than limit the discharge to the WQS, the permittee subtracts the temperature of the discharge (either end of pipe or at the edge of a 50-foot mixing zone, if needed) from the higher of the ambient temperature or the WQS. The limitation is zero, as anything above zero would mean the discharge temperature is too high.

For the case of a large discharge (defined in this permit as greater than 100,000 gpd or greater than half of the flow of the receiving stream), the permit establishes a limit on temperature directly based on the water quality standards established at COMAR 26.08.02.03-3. The rationale behind this decision is that extremely large discharges have a greater potential to prevent the receiving stream from ever decreasing from an ambient temperature which already exceeds WQS, so in those instances, it is not appropriate to

simply allow the discharge to meet current ambient temperatures. In cases where the ambient temperature is below the WQS, the limit is actually the same as that of "temperature difference."

Total Volatile Organics: The Department has always included a technology-based limit for organics for impacted wastewaters which are being treated using air stripping, carbon adsorption, and/or air sparging systems, among others. Based on best professional judgment, this limitation has been established as 100 µg/L and has typically been defined as applying to the sum of all parameters in EPA Test Method 624. In order to match this parameter to a STORET code for tracking purposes, it has been defined as "Total Volatile Organics." Examples of individual permits containing such a limit for groundwater remediation are State Numbers 15-DP-3613 and 16-DP-3149.

BTEX: BTEX is an abbreviation for benzene, toluene, ethylbenzene, and xylenes and is represented by the sum of those four parameters and has been limited to 100 µg/L based on best professional judgment. These parameters are most prevalent (though not exclusive to) gasoline and have been applied in past iterations of the HT permit for tank bottoms wastewater as well as tank containment area discharges, if the tank contained gasoline. For this permit, BTEX limits have been borrowing from the Department's General Permit for the Discharge of Treated Ground Water from Oil Contaminated Ground Water Sources to Surface or Ground Waters of the State, which is implemented by MDE's Oil Control Program. Since this permit is applicable to discharges from groundwater remediation projects for contamination by oil plus other organics, it is only appropriate that the Department include the standards from the permit which governs groundwater impacted by oil only.

Of the four individual parameters which comprise BTEX, only benzene has an aquatic life water quality standard which is lower than the tech-based standard of 100 µg/L, so a corresponding daily maximum limitation of 22 µg/L has been included for benzene. Drinking water standards are more stringent for toluene (57 µg/L) and ethylbenzene (68 µg/L), so those have also been included as limitations if the discharge is to a stream classified as a drinking water source or to groundwater (which is regulated as a drinking water source). Water quality standards are found at COMAR 26.08.02.03-2G.

Total Petroleum Hydrocarbons: The daily maximum limitation of 15 mg/L for "total petroleum hydrocarbons" has been taken directly from the Department's General Permit for the Discharge of Treated Ground Water from Oil Contaminated Ground Water Sources to Surface or Ground Waters of the State, which is implemented by MDE's Oil Control Program. It is applicable to petroleum-impacted groundwater which contains contaminants other than gasoline. As in that permit, "total petroleum hydrocarbons" is defined at the sum of all parameters in EPA Test Method 8015B.

Individual Organic Parameters: In addition to the limits on total volatile organics, BTEX, and total petroleum hydrocarbons, it is also necessary to limit several individual organic compounds which comprise those conglomerated parameters. All of these limits are based on the most stringent water quality standards for aquatic life/consumption of organisms (for non-drinking water streams) or drinking water maximum contaminant levels/criteria for drinking water plus organism consumption (for drinking water streams and groundwater) as established in COMAR 26.08.02.03-2G or via EPA's National Water Quality Criteria. Since there is limited opportunity for assessment of water quality, flow analysis, or reasonable potential on a case-by-case basis, the Department has taken the most conservative approach for this general permit in establishing the strictest limit from the possibilities expressed above. While limitations considering consumption of organisms would not be applicable for groundwater discharges,

the Department determined it was streamline the permit and avoid confusion to include a single limit for such parameters for drinking water streams and groundwater, thus selecting the more stringent of the two. Permittees seeking relief from such limitations would be able to request an individual permit.

Individual organic compounds that are not limited have been excluded because they either have no water quality criteria or the value is greater than the technology standard for the applicable conglomerated parameter. In order to specifically identify each parameter and avoid nomenclature confusions (as organic parameters often have many alternate names), the Department has included CAS number and STORET codes, which uniquely define each parameter.

Total Lead: If groundwater has been impacted by leaded gasoline, it has the potential to contain elevated concentrations of lead. As a result, limitations have been included in the permit for this scenario, again based on the water quality criteria at COMAR 26.08.02.03-2G.

Individual Metal Parameters: The 25HT general permit now includes the remediation of metals in Discharge Category D, a change from the 17HT. This update addresses the Department's numerous applications seeking general permit coverage for sites with metal-contaminated groundwater, where remediation had been anticipated. The inclusion of metal remediation aims to improve Department efficiency and decrease individual permit backlogs, as relatively-standard treatment technologies are available for the reduction and removal of metals and toxic substances in groundwater. Consequently, the 25HT incorporates limitations to facilitate the remediation of specific parameters.

Applicants applying for coverage under Discharge Category D may be required to submit a site assessment (e.g., NPDES Form 2C) to identify parameters of concern. If the assessment reveals pollutants beyond the scope of the 25HT, the application will be denied.

The Department adheres to the water quality standards specified in COMAR 26.08.02.03-2G, Numerical Criteria for Toxic Substances in Surface Waters, and enforces those standards at the end-of-pipe. The values within this COMAR section are based on an assumed average hardness of 100 mg/L. Although the toxicity of some metals correlates with water hardness, the 25HT general permit does not allow for hardness adjustments. If such an adjustment is deemed necessary to meet water quality standards, the general permit application will be denied, and an individual permit application or alternative permit coverage will be required

For discharges entering non-drinking water surface waters, the 25HT establishes limitations based on the applicable standard, which varies depending on whether the receiving stream is salt or fresh water. These standards set limits for pollutants such as arsenic, cadmium, chromium III, chromium VI, copper, cyanide, lead, mercury, nickel, selenium, silver, and zinc as shown in the table below:

Limitations for Metals for Discharges Waters Not Designated for Public Water Supply
(where separate limitations exist for fresh versus salt water, the limits are presented as "fresh/salt")

Parameter	Daily Maximum	Monthly Average	Units
Arsenic	340 / 69	150 / 36	µg/L
Cadmium	1.8 / 33.13	0.72 / 7.9	µg/L

Parameter	Daily Maximum	Monthly Average	Units
Chromium III	570	74	µg/L
Chromium VI	16 / 1100	11 / 50	µg/L
Copper	13 / 4.8	9 / 3.1	µg/L
Cyanide	22 / 1	5.2 / 1	µg/L
Lead	65 / 210	2.5 / 8.1	µg/L
Mercury	1.4 / 1.8	0.77 / 0.94	µg/L
Nickel	470 / 74	52 / 8.2	µg/L
Selenium	20 / 290	5 / 71	µg/L
Silver	3.2 / 1.9	REPORT	µg/L
Zinc	120 / 90	120 / 81	µg/L

For discharges into surface waters designated as drinking water sources, the 25HT established limits by comparing aquatic life standards with human health standards for drinking water and organism consumption, as well as drinking water Maximum Contaminant Levels (MCLs). The most stringent standard was applied. These restrictive limitations include the pollutants mentioned above, in addition to antimony, barium, beryllium, methylmercury, and thallium as shown in the table below:

Limitations for Metals for Discharges Waters Designated for Public Water Supply
(where separate limitations exist for fresh versus salt water, the limits are presented as "fresh/salt")

Parameter	Daily Maximum	Monthly Average	Units
Antimony	5.6	REPORT	µg/L
Arsenic	0.18	REPORT	mg/L
Asbestos	7 million	REPORT	fibers/L
Barium	1,000	REPORT	µg/L
Beryllium	4	REPORT	µg/L
Cadmium	1.8	REPORT	µg/L
Chromium (total)	100	REPORT	µg/L
Chromium III	REPORT	74	mg/L
Chromium VI	16 / REPORT	11 / 50	mg/L
Copper	13 / 4.8	9 / 3.1	µg/L

Parameter	Daily Maximum	Monthly Average	Units
Cyanide	22 / 1	5.2 / 1	µg/L
Lead	15	REPORT	µg/L
Mercury	1.4 / 1.8	0.77 / 0.94	µg/L
Methylmercury	0.3	REPORT	mg/kg in fish tissue
Nickel	470 / 74	52 / 8.2	µg/L
Selenium	20 / 290	5 / 71	µg/L
Silver	3.2 / 1.9	REPORT	µg/L
Thallium	0.24	REPORT	µg/L
Zinc	120 / 90	120 / 81	µg/L

It is particularly noteworthy that there is no daily maximum limit for chromium (III) in all waters or chromium (VI) in salt water. This is because the limitation for total chromium is more restrictive. In those instances, the permittee is still required to report the daily maximum for each constituent.

PFAS: The 25HT introduces non-detect limits for PFAS (per- and polyfluoroalkyl substances) under Discharge Category D. PFAS are emerging pollutants of concern, and while the State currently lacks a water quality standard, the Department has initiated monitoring in specific discharge permits where PFAS contamination is a concern (e.g., State permit 21DP0359). Additionally, the Department is in the process of developing water quality standards for PFAS with tentative plans to have them open for public comments in the second half of this year (2025). It is likely that this general permit may be updated before the issuance of any PFAS water quality standards, so in the absence of a water quality standard the Department is implementing a non-detect limit in the 25HT, anticipating that technology and filtration methods will be used to treat PFAS in discharges to achieve these limits.

Monitoring Frequency: The 25HT includes a tiered monitoring concept for hydrostatic test discharges (Discharge Category A). This concept is borrowed from the Department's General Permit for the Discharge of Treated Ground Water from Oil Contaminated Ground Water Sources to Surface or Ground Waters of the State, which is implemented by MDE's Oil Control Program. Since there is no reason to expect significant variation throughout the duration of these discharges, the more important governing factor is flow volume, as higher flows have the ability to have greater impact on the receiving stream.

To improve the Department's efficiency and expand general permit coverage, the monitoring frequency for Discharge Category D has been updated in the 25HT (which previously used a tiered monitoring concept in the 17HT) to better match individual permits. The inclusion of metal remediation and revised monitoring schedules aims to increase the number of applicants covered under general permits, reducing the need for individual permits.

The revised monitoring frequency for Discharge Category D requires weekly sampling for the first month, ensuring a minimum three-day interval between samples, dependent on discharge frequency. If water quality standards and limitations are consistently met during this initial month, monitoring can transition to a monthly schedule with at least two weeks between samples. However, if any exceedances occur within the first month, weekly monitoring will continue until one full month of compliant results is obtained. The Department retains the authority to modify or revoke the permit if exceedances are recorded in two consecutive months. This structure for monitoring frequency is similar to the typical requirement for individual permits to regulate the discharge of remediated groundwater.

For the remaining categories which have carried over from the 17HT, the monitoring frequencies have remained the same. The potential for variation in water quality between startup, middle of the discharge, and the end of discharge is greater for these discharge categories, so monitoring either twice or thrice per discharge is more appropriate. Discharges from storm water containment areas is once per discharge, assuming that there is a visual detection of sheen. Monitoring in this instance is required before commencing discharge and since the sample must be representative, requiring more than one would be superfluous.

Discharges from construction dewatering which have pH limitations are required to monitor once per week, which is consistent with the terms of similar individual permits which have been issued by the Department.

Narrative Limitations

Discharge Category A: The narrative criteria for hydrostatic testing discharges specifies that any vessels must be cleaned prior to filling with test water, refers permittees to Part I.G.5 of the base permit regarding appropriations if they plan to use waters of the State to perform the testing, and that discharges not exceed the capacity of any treatment system being utilized. The rationale behind each of these conditions is essentially common sense, as they either prevent unnecessary pollution in discharges or refer permittees to other State requirements (appropriations).

Discharge Category B: For discharges from potable water systems, there are a number of specific items which the Department has determined should be present in the facility Pollution Prevention Plan (PPP), in addition to the requirements of Part III.B.2 of the base permit. Since this category often includes multiple discharges under a single NOI, an estimated schedule is important. Additionally, the permittee should be considering alternative discharge options, prior effluent data (if available), potential treatment options, and receiving stream information as they prepare for their discharges in order to provide the best protection for the environment possible. Lastly, the narrative condition stipulates that the permittee is responsible for ensuring that their PPP is protective and provides a timeline of 90 days if the Department ever notifies the permittee of deficiencies in their PPP.

Discharge Category C: Construction dewatering discharges have routinely been regulated by the Department using only narrative criteria, most notably in past applying of the "untreated raw water discharges" category of the 11HT permit. Since construction project are already responsible for having erosion and sediment control plans, this permit simply specifies requirements for those plans in relation to their discharges in Parts III.C.1 and III.C.3 of the base permit. The narrative conditions in Appendix A

refer permittees to those parts and also specify the requirement that a corrective action be implemented if a sediment plume is observed in the receiving stream.

Additionally, the narrative criteria stipulates that the Department may require organics monitoring to ensure that groundwater is not impacted prior to regulating under this Discharge Category, requires pH monitoring (and any necessary resulting corrective actions) be documented in the facility PPP, and specifies that coverage may be terminated when discharges have ceased (including reporting requirements until termination occurs). All of these requirements are to assure that the permittee is following their PPP and to protect the environment. Note that the Department reserves the right to waive any organics monitoring based on best professional judgment, which is logical, as some of the sites will have had no history of activity which could have reasonably led to impacted ground waters.

Discharge Category D: The only narrative criteria for groundwater remediation specifies that the permittee must identify their treatment technology if they are not using air stripping, carbon adsorption, air sparging or treatment for metal removal. Each of these systems have been utilized successfully in the past and the Department has determined that they are sufficient to achieve the BPJ-derived numerical limitation. In order to ensure protection of the receiving waters, the permittee is responsible for demonstrating that they can meet this limitation if they select an alternate treatment method.

Discharge Category E: The narrative criteria for fire control systems emphasizes the non-detectable chlorine limits and offers options for treatment to meet said limitation. If the pre-approved treatment methods are not used, the permittee must obtain approval for an alternate method prior to discharge. This is designed to protect the receiving waters, as the Department is only willing to pre-approve methods which have been routinely shown to be effective. Additionally, narrative criteria specifies that the discharge limitations for temperature are to protection exceedances in the receiving stream and suggests flow reductions or decreasing effluent temperatures as a means to avoid such exceedances.

Discharge Category F: This category is for untreated water and only contains narrative criteria that discharges cannot create a noticeable sediment plume or color change in the receiving stream and refers permittees to the erosion and sediment control section in the base permit for guidance on creating an outfall. As these discharges consist of only raw water, there is no basis for additional limitations.

Discharge Category G: The narrative criteria for the storm water from aboveground containment areas category has been carried over directly from the 17HT iteration. It requires that the outfall be valved and the valve be closed except when draining, which ensure protection from unnoticed spills which may have occurred in the area. It specifies that the permittee must visually inspect the containment areas prior to discharge (and a minimum of once per month) and log any inspections. Additionally, it outlines spill prevention and response procedures.

APPENDIX B: DEFINITIONS, ABBREVIATIONS, AND ACRONYMS

The standard terms and definitions have been moved into a separate appendix. Those that appeared in the 17HT were compared with recently issued General Permits, and if required in this permit, they have been included.