MARYLAND DEPARTMENT OF THE ENVIRONMENT

Water and Science Administration
Wastewater Pollution Prevention and Reclamation Program
1800 Washington Boulevard, Suite 455
Baltimore, MD 21230-1708

FINAL

Response to Public Comments

Regarding

General Permit For Discharges From Tanks, Pipes, Other Liquid Containment Structures, Dewatering Activities, And Groundwater Remediation

State General Discharge Permit Application No. 25HT

NPDES Permit No. MDG67

Last Revised: 9/8/2026

INTRODUCTION

The Department proposes to reissue the State/NPDES (National Pollution Discharge Elimination System) permit 17HT (NPDES No. MDG67) as the new 25HT. The 25HT permit applies to discharges of wastewater from tanks, pipes, other liquid containment structures, dewatering activities, and groundwater remediation in the state of Maryland.

The permit requires specific control measures and limitations at the facility based on the type of discharge. When the permit is formally adopted, industries currently covered by the 17HT permit will have 6 months to file a notice of intent (NOI) and fee payment to the Department to obtain coverage under the reissued permit.

The proposed permit requires the effluent from each type of discharge regulated by the permit to meet specific numerical and narrative limits. The proposed permit also requires monitoring and online electronic submission of Discharge Monitoring Reports. For the 25HT permit, the Department is also proposing several changes from the 17HT, which include:

* Expansion of the requirement for a Pollution Prevention Plan (PPP) to include all types of discharge regulated by the permit. Prior iterations of this permit required a PPP for discharges subject to numeric effluent limitations, which may pollute via erosion or have the potential to cause an in-stream exceedance of a water quality standard. This requirement will ensure that all permittees are establishing and documenting necessary treatment methods in advance and tracking the performance of those methods in actual practice;

* Clarifying language on limitations on coverage regarding filter backwash and firefighting foam. Water treatment systems that perform filter backwashing are covered under individual permits. As the permit covers discharges from fire control systems, the Department is clarifying that discharges containing firefighting foam are not permitted under this permit, as they have the potential to contain PFAS;

* Expansion of Category D (groundwater remediation) to include the remediation of groundwater contaminated by metals (pursuant to a regulation change to COMAR 26.08.04.09 K(2)). This will streamline the permitting process for discharges currently regulated by individual permits under a standard set of requirements;

* Clarifying language in Category D 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. This is to ensure that any separate agreement with the State is compatible with the 25HT;

* Introduction of limitations for PFAS added to Discharge Category D (non-detect levels). This inclusion allows the Department to require PFAS testing of the groundwater before application approval and permit issuance if it is determined that PFAS may be a pollutant of concern. Any discharges of remediated groundwater must meet non-detect limits using EPA Test Method 1633A (or the most current iteration approved by the Department);

* Modification of monitoring frequency under Discharge Category D. The revised monitoring schedule is similar to the typical requirements for individual permits to regulate the discharge of remediated groundwater.

* Clarifying language updates in Category E (discharges from fire control systems) to include fire hydrants that are not already connected to potable water systems and covered under Category B; and

Finally, besides minor language and formatting changes to the 25HT, all other terms and conditions remain largely unchanged from the 17HT permit.

ENVIRONMENTAL JUSTICE - Master general permits are applicable across the state of Maryland. Since they are not associated with a specific location, they are not subject to MD Environmental Article § 1–602(a)(2). Thus, an Environmental Justice score cannot be calculated.

Notice of a tentative determination and notice for a public hearing regarding this permit were published in papers in every county of the State and the Maryland Register on dates between June 15, 2026 and June 26, 2026. The public hearing was held on July 27, 2026 in the Owings Mills Meeting Room at the Owings Mills Branch of the Baltimore County Public Library. The public comment period concluded on August 13, 2026. Substantive comments which were received during the public comment period and the Department's responses to those comments have been summarized in this document, below.

In the event of any inconsistencies between the factsheet and this document, this document shall take precedence.

SUMMARY OF CHANGES FROM THE TENTATIVE DETERMINATION DRAFT

1. Note (16) has been removed for the Tables under Category D.
2. Category B includes additional language to clarify it covers hydrants associated with potable water systems.
3. Category C, Narrative Require 5 has been updated to remove the reference to reporting, as no reporting is required under this category.
4. Category E has been updated, including a title change and clarifying language, a tiered monitoring schedule based on flow for certain parameters, and additional narrative requirements for chlorine.
5. Language in Part II.C.2.b has been updated to address concerns with LLC signatory requirements.
6. Part IV.E has been updated to provide clarity regarding notification requirements.
7. Part V.M.6 has been removed to address security/restriction concerns.

1. **TOPIC OF MULTIPLE COMMENTS: PFAS**

Maryland Chamber of Commerce, written comments

Provide update on timeline for development of Maryland's PFAS water quality standards. Address missing Note (16). Requests supporting information demonstrating treatment can economically achieve proposed limits. Recommend a monitoring-based approach for PFAS.

Tom Ballentine, CREDA - Maryland, written comments

Identify alternative compliance pathway should non-detect levels be unachievable. Provide technical justification, demonstrating proposed non-detect standards are reasonably achievable under real-world remediation and construction conditions. Requests for case-by-care review process or alternative compliance mechanism for complex remediation projects, consider risk-based or technology-based approach in lieu of blanket non-detect requirements.

RESPONSE

The Department clarifies that General Permit 25HT is not intended to establish universally achievable PFAS effluent limits for every industrial sector, remediation site, or operational scenario. By design, general NPDES permits cater to a broad class of discharges using standardized conditions and conservative baseline protection levels. Because general permits do not evaluate individual facility economics or site-specific hydrogeological conditions, the limits within General Permit 25HT reflect conservative protective standards achievable under optimal Best Available Technology (BAT) scenarios, such as properly designed and operated granular activated carbon (GAC) or ion exchange systems, as identified by the EPA. If an applicant demonstrates that their proposed treatment system or site conditions can consistently meet the limits outlined in General Permit 25HT, they may apply for and obtain coverage under this general permit. If an applicant or permittee determines that site conditions or technical constraints prevent them from achieving the general permit's conservative limits, they will be directed to apply for an Individual NPDES Permit. While all applications, particularly those applying under Category C and D, are already reviewed and considered on a case-by-case basis, the General permit cannot provide site-specific variances or tailored effluent limitations. The Individual NPDES Permit process is the proper venue for MDE to conduct more in-depth, site-specific, technical and economic reviews. Through an individual permit application, MDE can evaluate complex remediation conditions, background concentrations, and localized water quality impacts to establish customized limits or alternative compliance schedules. The Department would like to emphasize that the general permit is not expected to cover every facility or site that has been contaminated with PFAS. That does not mean those discharges cannot be regulated. It can be regulated through the individual permit process instead.

Regarding the State's water quality criteria for PFAS, that determination is outside the scope of the Industrial and General Permits Division, which is responsible for issuing industrial discharge

permits, including the HT general permit. Establishing water quality criteria for PFAS is beyond the authority of this permit or division. That responsibility rests with the Water Quality Standards Division. Additional details are available at the link provided at the end of this section.

The Department recognizes that state and federal scientific understanding of PFAS and treatment continues to evolve. Should either an applicable water quality standard or technology standard be introduced during the effective 5-year term of the general permit, the Department retains the authority to modify the general permit to update these effluent standards accordingly.

Finally, the reference to Note (16) in the monitoring table for Total PFAS was included in error and has been removed from the table. The original intent of this note was to include the definition of PFAS, but it was instead added to the list of definitions in Appendix B.

Information on Water Quality Standards can be found at:
https://mde.maryland.gov/programs/water/TMDL/WaterQualityStandards/Pages/index.aspx

CHANGES FOR THE FINAL PERMIT

The reference to Note (16) in the monitoring table to Total PFAS within Discharge Category D has been removed.

2. **TOPIC OF MULTIPLE COMMENTS: Discharge Category B**

Matthew Ballantine, Cove Point LNG, LP, written comments

Modify section to make clear that "fire hydrants" are hydrants affiliated with the water distribution system and consider the term "flush hydrants" so not to confuse this with hydrants for firewater supply. Request verification that there are no reporting requirements if there is no mechanical cleaning, super chlorination, or dechlorination.

NSA Bethesda, written comments

Request clarification if there are any required information or actions that must be included as part of the watermain break response, specifically dechlorination of discharges during a watermain break where it may not be possible to treat immediately.

RESPONSE

Appendix A, Category E states that its coverage applies to the flushing of fire hydrants provided they are connected directly and solely to the facility's water suppression system, and further clarifies that hydrants affiliated to water distribution systems will be covered under Discharge Category B. Discharges covered under Category B where mechanical cleaning has not occurred, and where water has not been super chlorinated or chemically dechlorinated do not require

monitoring of any numerical limitations, and therefore no reporting is required. Facilities covered under Category B are still subject to the narrative criteria (which includes chlorine and pollution prevention plan requirements) regardless of whether they are subject to numerical limitations or not. To provide the utmost clarity, the Department has altered the language under eligible discharges for Discharge Category B to say "wastewater from draining or flushing of hydrants associated with the potable water system."

Any hydrant flush which occurs under Category E are subject to all of the applicable limits specified for that Category. Pursuant to the monitoring table for "Requirements for all discharges under this category," limitations for total residual chlorine are applicable for all discharges stemming from a chlorinated source. Pursuant to the monitoring table under the heading "Requirements for potable water sources which have been chemically dechlorinated," dissolved oxygen limitations are applicable when chemical dechlorination has occurred. Since all waters discharges under Category E are not necessarily potable, the Department will remove the word "potable" from this table heading for clarity.

The Department recognizes the challenges associated with emergency watermain breaks. While the permit doesn't mandate a specific, standardized template for watermain break response plans, those with coverage under Category B must outline a reactive strategy in their PPP. These include identifying treatment options and Best Management Practices for different emergency scenarios, visual inspection, and notification to the Department of unanticipated emergency discharges exceeding 100,000 gallons within a 24-hour period. The Department understands that immediate dechlorination is often unfeasible at the beginning of an emergency watermain break, but dechlorination must still be addressed in the PPP. Also, the Department would like to emphasize that a watermain break discharging solely to groundwater is exempt from numerical limits and reporting, which alleviate dechlorination compliance issues in a watermain break scenario.

CHANGES FOR THE FINAL PERMIT

The first sentence under eligible discharges has been amended from "…or wastewater from draining or flushing of fire hydrants" to "…or wastewater from draining or flushing of hydrants associated with the potable water system."

The heading above the third monitoring table is changed from "Requirements for potable water sources which have been chemically dechlorinated" to "Requirements for water sources which have been chemically dechlorinated."

3. TOPIC OF MULTIPLE COMMENTS: Discharge Category C

NSA Bethesda, written comments

Recommend removing the "No Discharge" submission via NetDMR for this category, as there are no reporting numerical limitations for this category.

RESPONSE

To ensure permit holders understand their obligation to report numerical data required across all categories, a reporting requirement was initially included in Appendix A, Category C, Narrative Requirement 5. While Category C coverage alone does not entail reporting, permit holders may possess coverage under other categories that do. To clarify this requirement and resolve commenter concerns, the reporting reference in Category C, Narrative Requirement 5 will be removed, although permit holders should continue to report under other categories until the permit is terminated.

CHANGES FOR THE FINAL PERMIT

Appendix A, Category C, Narrative Require 5 has been updated to read:

"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 continue to be responsible for adhering to the narrative requirements of this category and/or numerical requirements under other Categories (where applicable)."

4. **TOPIC OF MULTIPLE COMMENTS: Discharge Category E**

Cara Schwartz, EA Engineering, Science, and Technology, Inc., PBC, written comments

Consider establishing a low volume threshold or volume-based tiered approach similar to Category A and adjust narrative requirements as necessary. Consider representative sampling and volume estimates. Add clarifying language to identify appropriate discharge categories and monitoring requirements for routine fire control system tests.

Matthew Ballantine, Cove Point LNG, LP, written comments

Clarify temperature monitoring requirements for this category when discharges are not sent directly to the receiving stream (e.g. stormwater retention pond).

RESPONSE

To address the concerns of the commenter regarding discharges associated with monitoring low-volume, short-duration discharges, the Department has established a tiered monitoring structure for Category E that is similar to Category A. Under this framework, discharges ranging from 101 to 2,500 gallons per event require a minimum monitoring frequency of once per discharge, while discharges of 2,501 gallons or more require at least two monitoring events per discharge. Furthermore, Category E now incorporates chlorine narrative requirements like Category B, covering small-volume releases from routine fire control system testing. Under these provisions, discharges must be free of chlorine; although explicit monitoring is not mandatory for volumes

of 100 gallons or less, permittees must maintain proof of concept demonstrating that their dechlorination systems operate effectively. The tiered frequency will also be used for facilities that utilize chemical dechlorination.

The Department clarifies that for discharges or testing events that exceed 100,000 gallons per day (or comprise more than half of the receiving stream's flow), the permittee must monitor the temperature of the effluent. This monitoring requirement applies to discharges that reach waters of the State. The Department recognizes that fire control system testing and flushing may first flow into a stormwater retention pond, swale, or other detention feature rather than discharging directly to a surface waterbody. In these scenarios, the permittee is not required to measure the temperature of the water at the initial point of release into the retention pond. Instead, temperature measurements must be taken at the outfall of the retention pond, so long as the sampling location yields a temperature reading that is representative of the final effluent reaching the receiving stream. The facility's operational configuration, along with the designated representative sampling location, must be documented in the facility's on-site pollution prevention plan. Footnote 5 for this monitoring table is modified to reflect that the limits apply to discharges into waters of the State.

Finally, the title of the category has been updated to clarify that routine testing of fire control systems are included in this category.

CHANGES FOR THE FINAL PERMIT

The title of the category has been updated to:

"Discharge Category E: Routine Testing, Draining or Flushing of Fire Control Systems"

Note 3 for the tables under Category E: Routine Testing, Draining or Flushing of Fire Control Systems has been updated to read:

"(3) Required monitoring frequencies must be based on volume of draining or flushing of fire control or fire suppression system events as follows:

> *If effluent is 100 gallons or less for the event, see narrative requirements.*
> *If effluent is 101 - 2,500 gallons for the event, minimum monitoring frequency must be 1/discharge.*
> *If effluent is 2,501 gallons or more for the event, minimum monitoring frequency must be 2/discharge."*

Note 5 for the tables under Category E has been updated to read (added wording is **bold/underlined**):

"(*5) This limitation is applicable when flows* ***to waters of the State*** *exceed 100,000 gpd or half of the receiving stream during current conditions. You should err on the side of caution and collect*

samples for reporting if this may be the case. If sampling is not applicable based on discharge volume (vs. flow conditions, if applicable), you must maintain a note in your records. You must verify compliance with the water quality standard by measuring temperature of the water to be discharged ***to waters of the State*** *within thirty minutes prior to commencing discharge. If the temperature exceeds the water quality standard for the receiving stream (68°F for Class III and III-P; 75°F for Class IV and IV-P; and 90°F for Class I, I-P, and II), then during the discharge, you must monitor temperatures in even intervals (at least three measurements) at the edge of the 50-foot mixing zone, as identified in Note 3, above."*

Narrative Requirement 1 of Category E has been updated to include the following statements:

"While monitoring of chlorine is not required for all types of discharges under this category, you remain responsible for ensuring that your discharges meet the terms of the narrative condition. You must be prepared to demonstrate that your best management practices (BMPs) and treatment technologies are sufficient to meet the requirements of this condition if requested by the Department. All BMPs, treatment methods, and any monitoring results collected to demonstrate compliance with the narrative condition must be documented in your PPP. Proof of concept, including pictures of the treatment process with testing results and data demonstrating that the treatment system works must be included."

5. TOPIC OF MULTIPLE COMMENTS: Discharge Category H

Matthew Ballantine, Cove Point LNG, LP, written comments

Clarify if HT coverage is required for discharges already operating under an NPDES permit which include Spill Prevention, Control, and Countermeasure regulations, which already address this discharge type.

RESPONSE

Duplicate permit coverage is not required for any permit holder that already has coverage for stormwater discharges from aboveground tank containment structures. So long as their current permit addresses these discharges, additional permit coverage under the 25HT is not required. If you are unsure if your current permit covers these discharges, the Department recommends you reach out to the permit writer or division that issues the permit to receive clarification.

CHANGES FOR THE FINAL PERMIT

No changes are required for this topic.

6. TOPIC OF MULTIPLE COMMENTS: Part I.B.9 – Other allowable discharges

NSA Bethesda, written comments

Clarify if other allowable discharges must adhere to permit terms not included in Appendix A, including visual monitoring, incorporation of PPP, training of contractors, etc. Recommend not requiring training and visual monitoring for these discharges.

RESPONSE

The Department clarifies that the "other allowable discharges" listed in the permit are authorized solely as ancillary discharges. Standalone coverage cannot be obtained for these specific activities; they are only permitted at a facility that has already registered and obtained coverage for a primary discharge category under Categories A through H. Because the facility must already develop and implement a PPP and ensure its personnel and contractors are trained for its primary permit activities, these general compliance obligations naturally extend to any ancillary discharges occurring on the site. All discharges authorized under this permit, including these ancillary flows, must comply with the narrative requirements, which prohibit visible sheens, floating solids, or persistent foam. Visual monitoring and training are the primary, essential mechanisms to ensure that these activities (such as pavement washing or structure wash-downs) do not introduce unauthorized pollutants like detergents or paint chips into waters of the State. Therefore, the Department does not find it appropriate to exempt these discharges, and visual monitoring, PPP incorporation, and training requirements remain necessary to protect water quality and ensure compliance with the permit's narrative standards.

CHANGES FOR THE FINAL PERMIT

No changes are required for this topic.

7. **TOPIC OF MULTIPLE COMMENTS: Part II.A.1.a – NOI**

Matthew Ballantine, Cove Point LNG, LP, written comments

Request that NOI form be modified to include the latitude/longitude of multiple outfalls or "permitted features."

RESPONSE

The Department intends for the 25HT NOI to follow the same template as the 17HT NOI. Section III.C of the NOI allows for up to 3 outfalls, with the latitude/longitude, to be included. For additional outfalls or permitted features, you may print additional pages or simply include a separate document/page that lists the outfalls with their coordinates.

CHANGES FOR THE FINAL PERMIT

No changes are required for this topic.

8. **TOPIC OF MULTIPLE COMMENTS: Part II.C.2.b – Signatories for LLC**

Robert M. Matty, Jr, Constellation Energy Generation, LLC, written comments

Recommends either removing the Signatories for an LLC language or adding the same or similar language as listed in Part II.C.2.a of the definition of a responsible corporate officer for the corporation, so those who already have authority to make operational and financial decisions on behalf of the corporation retain the ability to sign documents and to keep the decision making at a site level with those who have day-to-day responsibilities for the facility.

RESPONSE

The signatory requirement for LLCs was added to the permit because LLCs are a distinct type of entity not clearly covered by the signatory requirements for other entities. Based on this comment, the Department has revised the language to better accommodate complex LLC structures.

CHANGES FOR THE FINAL PERMIT

The language in Part II.C.2.b has been updated to read:

"*For a Limited Liability Company (LLC): By a member of the LLC with authority under the LLC's Articles of Organization, or the functional equivalent of a responsible corporate officer as defined in paragraph (a) above.*"

9. **TOPIC OF MULTIPLE COMMENTS: Part IV.A.3 – Visual Inspection of discharges**

Matthew Ballantine, Cove Point LNG, LP, written comments

Requests that logging of visual inspections be permitted to take place in other suitable locations such as a discharge log form or checklist, and that the permit not specifically state that the record must be kept in the PPP, as they may have different formats.

NSA Bethesda, written comments

Would like verification if a standard form for visual monitoring will be provided as it was under Part IV.A.3 of the 17HT. The 25HT permit lists Visual Inspection of Discharges only for discharges with numeric limits (Part IV.A.3), though the fact sheet still lists it under narrative requirements and omits this change from the summary. Clarify if discharges with only narrative requirements are exempt from collecting visual inspections under the 25HT permit.

RESPONSE

The Department would like to clarify that visual inspection records, though considered part of the PPP, are not required to be physically stored within the PPP file or folder. No standardized

template is mandated by the Department for the PPP or associated monitoring logs. Instead, permit holders are free to establish their preferred recordkeeping methods, such as using checklists, logbooks, or digital databases, provided these records remain accessible to the Department upon request.

The intent of the visual monitoring requirement is to ensure there are no visible impacts of the discharge on the receiving stream. While there is no standard form that a permit holder is required to use for visual inspections, the Department recommends that permit holders should look for oil sheens, floating solids, visible plumes of sediment or color, and/or persistent foam as part of their routine visual monitoring.

The Department acknowledges that the formatting changes to the permit may have caused confusion regarding visual monitoring and would like to provide the following clarification to address the concern. Although the visual inspection requirement was previously located under "Narrative Requirements Applicable to All Discharges" in the 17HT permit, visual monitoring remains mandatory, even for discharges that lack numerical effluent limitations. This requirement has been relocated to the "Monitoring and Reporting" section of the 25HT. Part IV of the permit specifies both “sampling for numerical limits” (e.g. collecting grab samples) *and* implementing “specific monitoring procedures” (visual inspections). Even though visual inspection is a narrative condition, the Department determined it was most appropriately placed in the Monitoring and Reporting section since it is a monitoring practice.

CHANGES FOR THE FINAL PERMIT

No changes are required for this topic.

10. **TOPIC OF MULTIPLE COMMENTS: Part IV.E – Notification Requirements**

Matthew Ballantine, Cove Point LNG, LP, written comments

Request that discharges to features which do not create immediate water flow offsite are not required to make a 48-hour notification to the Department, and that it would only apply to discharges of 100,000 gallons in a 24-hour period sent directly to a receiving waterway.

RESPONSE

The Department understands and recognizes the concern with the notification requirements and would like to clarify the reasoning and intention behind it. For this topic, the Department’s primary regulatory concern remains focused on large-volume discharges that flow directly into a water of the State, where they have greater potential to cause erosion, thermal shock, or other immediate environmental impacts. Should a facility have a large-volume discharge that is directed to an on-site retention pond or self-contained basin where there is no immediate discharge to waters of the State, the Department understands this to effectively be a form of treatment technology. The concern is when that water leaves the outfall of that basin and reaches

waters of the State. To address the concern of the commenter, the language of the requirement has been updated.

CHANGES FOR THE FINAL PERMIT

Part IV.E has been updated to read (added wording is **bold/underlined**):

"Notification for Large Discharges – If the total wastewater discharge ***to waters of the State*** *from any single discharge event will exceed 100,000 gallons within a 24-hour period, you must notify the Water and Science Administration's Compliance Program by phone at 410-537-3510 no later than 48 hours prior to the first discharge. For unanticipated discharges (e.g. water main breaks) which exceed or are expected to exceed 100,000 gallons, notification must be provided as soon as possible.*

11. **TOPIC OF MULTIPLE COMMENTS: Part. V.M.6**

NSA Bethesda, written comments

Part V.M.6 Requires that facilities provide access for unmanned aircraft systems to conduct inspections. This is not possible for some facilities such as military facilities that have restricted air spaces. Recommend removing this requirement, reverting it to previous permit language of "take photographs (which may require direction for reasons of national security)", or creating a carveout for secure facilities that can remove this requirement so coverage under the general permit is still possible.

RESPONSE

The Department recognizes the concern with the Inspection and Entry requirement (6) regarding the use of unmanned aircraft systems to conduct inspections, collect samples, or make visual observations. The Department understands these concerns, particularly regarding military or federal facilities with restricted airspace. To ensure that secure facilities can remain eligible for coverage under this general permit, the Department has removed requirement (6) from the permit and will revert to language that allows for standard inspection access while preserving necessary security protocols and restrictions.

CHANGE FOR THE FINAL PERMIT

Part V.M.6 has been removed.

12. **TOPIC OF MULTIPLE COMMENTS: Definitions**

Matthew Ballantine, Cove Point LNG, LP, written comments

Request definition to define the term “receiving stream” and “overland flow” to clarify the intended meaning for purposes of permit compliance, specifically when discharging to a non-discharging stormwater feature, intermittent channel, etc.

RESPONSE

For the purposes of this permit, a receiving stream (or receiving waterbody) is the first natural or public waterbody that a discharge enters, whether directly or through intermediary conveyances like private storm sewers, pipes, ditches, or swales. Under Maryland law, this includes not only constantly flowing streams and rivers, but also dry intermittent channels, wetlands, public ditches, and drainage systems, all of which are classified as "waters of this State."

Overland flow refers to any authorized discharge released onto land where it can naturally percolate into the ground or evaporate, or any discharge that flows across the land surface before reaching surface waters, provided it does so without causing erosion or compromising sediment controls in accordance with the permit's requirements.

CHANGES FOR THE FINAL PERMIT

No changes are required for this topic.