

In the Matter of:

Maryland Department of the Environment

February 6, 2017
Public Hearing

Condensed Transcript with Word Index



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1 MARYLAND DEPARTMENT OF THE ENVIRONMENT
 2 WATER MANAGEMENT ADMINISTRATION
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 6 PUBLIC HEARING:
 7 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
 8 STATE AND FEDERAL
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 11 The hearing in the above matter commenced on
 12 Monday, February 6, 2017, at the MDE Headquarters,
 13 Montgomery Park, 1800 Washington Boulevard, Baltimore,
 14 Maryland.
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 19 Reported by: Linda Metcalf
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1 A P P E A R A N C E S
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 3 ON BEHALF OF THE MARYLAND DEPARTMENT OF THE ENVIRONMENT:
 4 RAYMOND BAHR
 5 DEBORAH CAPPUCCHETTI
 6 CHRISTINA LYERLY
 7 MICHELLE CRAWFORD
 8 Maryland Department of the Environment
 9 1800 Washington Boulevard
 10 Baltimore, Maryland 21230
 11
 12 SPEAKERS:
 13 James O'Day, WSSC
 14 J.L. Hearn, WSSC
 15 Jai Cole, MNCPPC
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1 P R O C E E D I N G S
 2 - - - - -
 3 (1:34 p.m.)
 4 MR. BAHR: Okay, let's go ahead and get
 5 started. Good afternoon and welcome. Today is Monday,
 6 February 6th, 2017, and it's approximately 1:34 p.m.
 7 Today's public hearing is regarding Maryland Department
 8 of the Environment's (MDE's) tentative determination to
 9 issue a National Pollutant Discharge Elimination System
 10 (NPDES) General Permit for discharges from small State
 11 and Federal separate storm sewer systems (MS4s). For the
 12 record, it's General Permit Number 13-SF-5501, General
 13 NPDES Number MDR055501.
 14 My name is Raymond Bahr, Program Review
 15 Division Chief in the Sediment, Stormwater and Dam Safety
 16 Program within MDE's Water Management Administration.
 17 With me here today is Deb Cappuccitti and Christina
 18 Lyerly and Michelle Crawford, who are engineers and
 19 natural resource planners in the Program Review Division,
 20 and they help to lead the administration of the small MS4
 21 general permit.

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1 In accordance with Title 1, Subtitle 6 of the
 2 Environment Article and Title 26, Subtitle 8, Chapter 4
 3 of the Code of Maryland Regulations, a tentative
 4 determination to issue an NPDES small MS4 general permit
 5 for State and Federal agencies has been advertised in the
 6 Maryland Register on December 23rd, 2016.
 7 In addition, notices were placed in 13 regional
 8 and local newspapers throughout the State, beginning on
 9 December 22nd or December 23rd, 2016, and a second notice
 10 was published on December 29th or December 30th, 2016.
 11 These notices also included the date of today's public
 12 hearing. MDE also provided notice of the upcoming
 13 tentative determination process to an interested parties
 14 list on December 21st, 2016. And it has been publicized
 15 on MDE's website, along with its fact sheet and draft
 16 permit.
 17 Anyone who signed the attendance sheet this
 18 morning will be added to MDE's interested parties list
 19 and will be notified of any decisions or actions related
 20 to the general permit. If you have not signed the
 21 attendance sheet and want to be on MDE's interested party

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1 list, please be sure to do so before leaving today.
 2 I will start with some background information
 3 on MS4 permitting in Maryland, and more specifically
 4 about the current iteration of the Phase II State and
 5 Federal general permit. After that, I would like to give
 6 any elected officials that are here today an opportunity
 7 to comment. Then we'll work our way through the speakers
 8 list, and from my understanding, we have two maybes so
 9 far, an opportunity to comment.
 10 The purpose of today's hearing is to accept
 11 public comment on MDE's tentative determination to issue
 12 an NPDES general permit for discharges from small State
 13 and Federal MS4s. MDE has drafted a general permit
 14 designed to comply with the United States Environmental
 15 Protection Agency's (EPA's) regulations to control
 16 stormwater pollutant discharges from small State and
 17 Federal MS4s. The permit is issued for five years.
 18 This hearing is part of MDE's obligations for
 19 meeting public participation requirements under the
 20 Environment Article of the Annotated Code of Maryland.
 21 Written comments concerning this general permit will be

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1 accepted through March 30th, 2017. This comment period
 2 already incorporates an additional 60-day extension
 3 period provided in Environment Article Subtitle 1-
 4 606(d)(2)(ii).
 5 Maryland has been delegated authority by EPA to
 6 administer the NPDES program in the State. Final
 7 stormwater regulations were adopted by EPA in November
 8 1990 in accordance with Section 402(p) of the Clean Water
 9 Act. Phase I of these regulations required municipal
 10 owners of storm drain systems serving populations of
 11 greater than 100,000 to apply for a stormwater permit.
 12 In Maryland, ten jurisdictions and the State
 13 Highway Administration were required to apply for
 14 individual NPDES stormwater permit coverage. Smaller
 15 cities and towns and State and Federal agencies within
 16 these Phase I jurisdictions often had significant and
 17 interconnected storm drain systems but were not affected
 18 by these Phase I regulations.
 19 In December 1999, EPA promulgated the NPDES
 20 Phase II regulations, expanding the stormwater permitting
 21 program to smaller localities, as well as State and

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1 Federal agencies, located in Census-defined urbanized
 2 areas or designated by the permitting authority. MDE's
 3 first Phase II MS4 general permit for State and Federal
 4 agencies was issued on November 12th, 2004.
 5 The Phase II program is described in 40 Code of
 6 Federal Regulations Subsection 122.3 through 122.37 and
 7 requires the implementation of six minimum control
 8 measures. These six measures are public education and
 9 outreach; public involvement and participation; illicit
 10 discharge detection and elimination; construction site
 11 stormwater runoff control; and post-construction runoff
 12 control; also pollution prevention and good housekeeping.
 13 The successful implementation of the six
 14 minimum control measures and other permit conditions
 15 constitute a compliance with the standard of reducing
 16 pollutants to the maximum extent practicable, protecting
 17 water quality and satisfying the requirements of the
 18 Clean Water Act.
 19 This proposed permit action today is to issue a
 20 "second-generation" NPDES MS4 general permit for Phase II
 21 State and Federal agencies. This new permit includes

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1 additional conditions for consistency with EPA-approved
 2 total maximum daily loads, or TMDLs, to support
 3 Chesapeake Bay restoration efforts, as well as addressing
 4 local water quality concerns.
 5 Conditions of the permit will require small
 6 State and Federal MS4s to commence restoration efforts
 7 for 20 percent of existing developed lands that have
 8 little or no stormwater management. Permittees will be
 9 required to perform watershed assessments, identify water
 10 quality improvement opportunities, secure appropriate
 11 funding, and develop an implementation schedule to show
 12 how the 20 percent impervious area restoration
 13 requirement will be achieved by 2025.
 14 This permit will be Maryland's first MS4 Phase
 15 II State and Federal general permit to require impervious
 16 area restoration to address water quality impacts from
 17 urban areas that were developed prior to the State's
 18 stormwater management program. These restoration efforts
 19 will build upon the six minimum control measures that
 20 were required under the previous permit cycle. Together,
 21 they ensure comprehensive watershed management strategy

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1 for controlling stormwater, improving the health of local
2 streams and rivers, and meeting the State's water quality
3 standards.

4 With that, I would like to ask if there are any
5 elected officials present today that would like to make a
6 statement for the record.

7 (No response.)

8 MR. BAHR: Okay, now we'll work our way through
9 the speakers list. Has everyone that wishes to speak
10 today signed up to do so on the attendance sheet?

11 (No response.)

12 MR. BAHR: Okay. Today's hearing is scheduled
13 for two hours, and we'd like to provide everyone an
14 opportunity to speak. Since we have two maybes, that
15 means each of you can probably testify for at least a
16 half an hour if you would like to, but do please keep
17 your comments concerning this permit.

18 With that, we'll go ahead and get started.
19 And, also, prior to giving your testimony, please help
20 our stenographer by clearly pronouncing your name and
21 then spelling it out completely.

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1 And James O'Day from the WSSC.

2 MR. O'DAY: I'm a maybe, and the reason for
3 that is J.L. Hearn I think will be the primary speaker of
4 WSSC, but I wanted to reserve the right to be able to
5 speak.

6 MR. BAHR: With no further ado, Mr. J.L. Hearn.
7 Would you like to come up here to the podium with the
8 speaker?

9 MR. HEARN: We have several concerns, and I
10 sort of had the feeling that you would go through the
11 parts of the permit first, but you didn't really do that.
12 So let me talk about the few issues that we do have
13 concerns with.

14 First is the substantial contribution to
15 pollutant loadings. That's identified as a possible way
16 to get a site to have an exemption. And rather than
17 formal comments, I basically have a series of questions
18 and I'd like to either have you respond now or in
19 writing, today if possible. So that was a question, how
20 do you -- how does one define what is a substantial
21 contribution.

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1 MR. BAHR: Sure.

2 MR. HEARN: And I can go through all these
3 before you respond, however you want me to do this.

4 MR. BAHR: Okay, well, I'd just like to say for
5 the record this is really to accept comments from you --

6 MR. HEARN: Okay.

7 MR. BAHR: -- and from other members of the
8 public. We're going to be here for the rest of today.
9 We can answer --

10 MR. HEARN: Okay.

11 MR. BAHR: -- the questions after the formal
12 hearing process.

13 MR. HEARN: Okay.

14 MR. BAHR: And obviously as part of our formal
15 response to comments, we'll respond to each one of those
16 individually.

17 MR. HEARN: Okay. Well, that was the first
18 question, how are you going to -- or how can one
19 determine what constitutes a substantial contribution of
20 pollution.

21 Secondly, a physical interconnection is an

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1 issue. Some discharges do not discharge directly to an
2 MS4, but they may discharge to a natural waterway, which
3 in turn goes to an MS4 collection system. So that was
4 really a request for clarification.

5 Our major concern has to do with timing issue
6 for waivers in the NOI. The waiver process, of course,
7 allows us to request that certain properties be exempt
8 from the permit requirements, but we will not know what
9 to include in an NOI until a decision is made on the
10 waivers. It just seems to be -- there needs to be a time
11 -- there's a timing issue where we may be left with
12 inadequate time to prepare the NOI or prepare plans if we
13 don't know what -- first what properties are exempt from
14 the requirements.

15 Another thing goes to the specific requirements
16 of the pollution prevention and good housekeeping. EPA
17 guidance on this does not include a specific stormwater
18 pollution prevention plan, which you have in your
19 proposal. And we think that goes above and beyond the
20 call of duty for a small site that is fenced from public
21 access. It may have a single tank on it. And,

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1 basically, very close or if not below the 10 percent
2 impervious area in the first place. We think a detailed
3 site plan showing the storm drainage on that site would
4 be adequate and that a separate pollution prevention plan
5 for a site that's not manned and nothing is stored on the
6 site except the only structure there is a water tank that
7 we don't believe a detailed pollution prevention plan
8 makes a lot of sense.

9 And I guess Jim was -- any other issues related
10 to the Bay TMDL that you wanted -- think we should talk
11 about today?

12 I guess the timing on the -- again, this goes
13 back to the waiver request. The permit calls for
14 developing impervious area restoration work plans and
15 baseline impervious assessments within one year of the
16 effective date of the permit. Again, this is something
17 that becomes an issue if there's any delay in making a
18 decision on the waiver request because we have to use --
19 we do use external consultants, and that's a process that
20 takes several months to develop certain plans.

21 So they are basically the summary of comments,

14

1 unless there's something else, Jim.

2 MR. O'DAY: I just have one thing to add.

3 MR. BAHR: Sure. Please go ahead.

4 MR. O'DAY: I'm James O'Day on behalf of WSSC.

5 On the impervious surface, the CFR doesn't seem to
6 define, that I've found anyway, the term "impervious
7 surface." We have some properties where it's a little
8 more complicated as to -- while it seems like it's self-
9 defining, I think we have some instances where it might
10 not be quite as clear.

11 If you take, for instance, a water tank, we
12 have a large water tank where obviously the top of the
13 water tank is going to block some of the rainfall from
14 hitting the ground, but eventually it's going to run off
15 to the same place that it probably would have.

16 And we're looking for some clarification as to
17 whether those are -- those types of facilities are going
18 to be calculated as part of the impervious surface. And
19 once again, that ties in with the waiver criteria, et
20 cetera. So we'd like a little more clarification and
21 maybe even some definition of "impervious surface" if you

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1 want to go there.

2 And another example would be we have large
3 sedimentation tanks at, for instance, our Potomac water
4 filtration plant, where rainfall falls into what might
5 ordinarily be characterized as an impervious surface, but
6 the water that goes in there is captured into a closed
7 system. So should we be calculating that as part of
8 those types of facilities, as part of our impervious
9 surface calculation, which once again might tie in with
10 whether a waiver is a possibility? So we would just like
11 some assistance and having some clarity on that.

12 MR. BAHR: Sure.

13 MR. O'DAY: Okay.

14 MR. BAHR: We can do that for you.

15 MR. O'DAY: Thank you.

16 MR. BAHR: And with that, I have Jai Cole from
17 Maryland National Capital Parks & Planning Commission, is
18 also a maybe.

19 MS. COLE: But you pronounced my name right.

20 MR. BAHR: I'm sorry. Please help us out.

21 MS. COLE: No, you pronounced it right.

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1 MR. BAHR: Oh, I did. Okay. I got lucky,
2 then.

3 MS. COLE: Nobody can pronounce it right, and
4 you did.

5 Okay, Jai Cole from MNCPPC. I guess we have
6 some of -- some of them are a little similar to WSSC,
7 although the first one is whether or not you guys are
8 going to coordinate with the WIP. It would be good to
9 fold both of those into the same permit instead of having
10 to report basically that we're doing our WIP requirements
11 through our NPDES permit. It just can all be rolled into
12 one. That would be convenient.

13 Also, a little bit of clarity on how
14 coordination with Phase I entities will be. We're a lot
15 different, and we can talk sort of offline about -- about
16 that, but how we coordinate with other Phase I entities
17 with some of our -- some of the requirements for places
18 that aren't sort of distinct polygons. Some clarity on
19 that would be good.

20 Like WSSC, we would like a little bit more
21 information on the waiver process for property

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1 exemptions. The portion of the permit that says
 2 basically that pollution prevention plans for each site,
 3 clarity on what site is. We have 420 parks, so I don't
 4 know what -- what the site is.
 5 There are -- there's also a lot of -- and
 6 forgive me, because we're a weird agency, but we're a
 7 State agency, but we're not permitted by the State. So a
 8 lot of the requirements in the permit talk about MDE
 9 permitting, and we're not permitted by MDE. So there's
 10 that.
 11 And then how -- and this is one of those things
 12 I'd have to go back and explain -- so the permittees with
 13 a new permit are only required if they have over 10
 14 percent impervious. Is -- I'm assuming that that's
 15 total. So we have two in our counterparts in Prince
 16 George's County, therefore, we wouldn't be required to
 17 have a permit.
 18 That would be a little bit of a -- because they
 19 have less than 10 percent and they didn't have a permit
 20 last time, so the thing that kicks us in is the fact that
 21 we had a permit last cycle. So we're -- we'll be a State

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1 agency and our counterparts won't have the same lovely
 2 headache that we have. That's mostly just -- okay.
 3 And I think that that's it. Did we have any
 4 other that I missed?
 5 (Brief pause.)
 6 MS. COLE: I think that's -- oh, just one small
 7 little comment. Under your Part (4)(a), the personal
 8 education and outreach, I don't know if it was left out
 9 or not, but there's not -- it doesn't say public
 10 education, it doesn't say personal outreach and public --
 11 sorry. Personnel education and public outreach, it
 12 doesn't say that anymore. It just says personnel
 13 education and outreach. I didn't know if that meant
 14 outreach internally or to the public, but the old permit
 15 said public outreach, so that's --
 16 MR. BAHR: Okay, great.
 17 MS. COLE: -- that's a thing for us. That's
 18 it.
 19 MR. BAHR: Thank you. Very good comments.
 20 Does anybody else here today wish to give
 21 testimony regarding this permit?

19

1 (No response.)
 2 MR. BAHR: Okay. I'll give you a little bit of
 3 where do we go from here, and then we're formally over,
 4 but please, if you have questions, stick around and staff
 5 will be here to help answer them.
 6 So, Linda, our stenographer, hopes to get us
 7 the transcript back in about two weeks. At that time,
 8 we'll put it up online, and we'll send an email out to
 9 everybody on our interested parties list and let you know
 10 about that.
 11 The record, as we've said numerous times, it's
 12 going to be open until March 30th, 2017. The process
 13 after that, we're going to aggregate all the comments.
 14 MDE will do a response to comments, and that will
 15 probably take a couple of months, and then we're going to
 16 issue a final determination.
 17 Once the final determination is issued, the
 18 designated State and Federal agencies will have 180 days
 19 to apply for coverage. And that's the process. That's
 20 about it. So with that, once again, going once, going
 21 twice, does anybody have any further testimony for this

20

1 formal hearing?
 2 (No response.)
 3 MR. BAHR: Okay. Sold. At approximately 1:53
 4 p.m., a record 23 minutes, we have completed the public
 5 hearing for the Phase II State and Federal MS4 General
 6 Permit. Thank you all.
 7 (Whereupon, the hearing was concluded at 1:53
 8 p.m.)
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1 CERTIFICATE OF COURT REPORTER

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3 I, Linda Metcalf, do hereby certify that the
4 foregoing transcription was reduced to typewriting via
5 audiotapes recorded by me; that I am neither counsel for,
6 nor related to, nor employed by any of the parties to the
7 case in which these proceedings were transcribed; that I
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9 employed by the parties hereto, nor financially or
10 otherwise interested in the outcome of the action.

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12

13

14 LINDA METCALF, CER
15 Court Reporter

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