

Meeting the Requirements of the National Pollutant Discharge Elimination System (NPDES) Remediation General Permit

Cathy Vakalopoulos
Environmental Analyst
MassDEP



Massachusetts Department of Environmental Protection

Shauna Little
Physical Scientist
EPA Region 1



Isaac Anderson
Project Manager
Cooperstown Environmental



COURSE overview

- The NPDES Program: 30 minutes – Cathy Vakalopoulos
- Requirements of the 2017 NPDES RGP: 1 hour – Shauna Little
- BREAK: 15 minutes
- Submission of a Notice of Intent for Coverage Under the RGP: 1 hour – Cathy Vakalopoulos & Shauna Little
- Massachusetts case studies: 1 hour – Isaac Anderson & Shauna Little
- Questions & answers: 15 minutes

The npdes program

- STATUTORY BACKGROUND OF NPDES
- FEDERAL AND STATE REGULATORY BACKGROUND
- TYPES OF NPDES PERMITS
- GENERAL PERMITS IN MA AND NH
- For more information:
- <https://www3.epa.gov/region1/npdes/index.html>

WHAT IS NPDES?

- National Pollutant Discharge Elimination System
- NPDES Permitting Program established by Section 402 of the federal Clean Water Act
- All point sources discharging pollutants into waters of the U.S. need NPDES permit from EPA or an authorized state, territory, or tribe



Photo from Saint-Gobain by C. Vakilopoulos

NPDES IN MASSACHUSETTS & NEW HAMPSHIRE

- MA and NH are 2 of 4 states NOT authorized to administer the NPDES program - EPA is permitting authority
- Permits co-issued by EPA and MassDEP
- MassDEP's Surface Water Discharge Regulations: 314 CMR 3.00
- MassDEP certifies under Section 401 of the CWA that permits comply with the MA Surface Water Quality Standards: 314 CMR 4.00
- Compliance/enforcement joint responsibility of both agencies
- MA is pursuing NPDES authorization (delegation)



Photo of Brayton Point by C. Vakilopoulos

NPDES PERMIT TYPES

INDIVIDUAL
AND
GENERAL

INDIVIDUAL vs. GENERAL

INDIVIDUAL PERMITS:

- Tailor requirements specific to the facilities
- Public notice and appeal processes
- In effect for five years
- Administratively continued if not reissued before expiration and reapplication received on time



Photo of Boston Sand & Gravel by C. Vekalopoulos

INDIVIDUAL vs. GENERAL

GENERAL PERMITS:

- Procedures similar to individual permits
- The GP itself is in effect for five years - authorizations are administratively continued until new permit is issued
- Owners/operators apply for coverage under a GP by filing a Notice of Intent
- Coverage can be obtained relatively quickly

GENERAL PERMITS

A permitting authority may issue a general permit if there are multiple sources in a geographic area that:

- Involve the same or substantially similar types of operations;
- Discharge the same types of wastes;
- Require the same effluent limitations or operating conditions;
- Require the same or similar treatment technologies or monitoring requirements; and
- In the opinion of the Director, are more appropriately controlled under a general permit than under individual permits.

MA NPDES PERMITS



230 INDIVIDUAL PERMITTEES
 130 MUNICIPAL
 100 INDUSTRIAL

 >2,000 GENERAL PERMITTEES
 ~250 ARE MS4 COMMUNITIES

GENERAL PERMITS IN MA

- Remediation
- Construction National GPs
- Dewatering • Multi-Sector
- Potable Water • Pesticide
- Small POTW • Vessel
- MS4 • Small Vessel
- Hydroelectric
- Noncontact Cooling Water



Photo of Putts Bridge Station in Wobram from lowmpachydro.org

Do I need an NPDES permit for discharges related to my construction or dewatering activity?


