

**Requirements of the 2017 NPDES Remediation General Permit (RGP)**

- Major Changes to the RGP
- Applicability and Coverage of the RGP
- Eligibility Under the RGP
- Special Eligibility Determinations
- Effluent Limitations
- Special Conditions, Including Best Management Practices (BMPs)
- Monitoring and Reporting Requirements
- Notification Requirements

<https://www3.epa.gov/region1/npdes/rgp.html>

---

---

---

---

---

---

---

---

**CHANGES AND UPDATES TO THE RGP**

- major dates:  
Permit Effective Date: [April 8, 2017](#)  
Permit Expiration Date: [April 8, 2022](#)  
Judicial Review Period: [March 23, 2017 to July 21, 2017](#)  
Deadlines for Obtaining Coverage: [NOI Required by July 7, 2017 for Existing Discharges; no other specific dates required](#)  
Coverage Effective Date: [Date Indicated in EPA's Written Authorization](#)

---

---

---

---

---

---

---

---

## Major Updates

Between the 2010 & 2017 RGP

Selected Requirement	2010 Permit Requirement	2017 Permit Requirement
Emergency Discharges	Not included	14-day provisional coverage; notification required
Chemical-Specific Limits	Appendix III, dilution factor range applied to metals, chloride, TRC only	Table 2.1.1, dilution factor applies to any WQBEL, but WQBEL must be calculated
Activity Categories	Activity category and activity sub-category determines parameters	Activity category and contamination types determine parameters
Monitoring	12-24 months influent and effluent; test methods and MLs specified	6 months influent and effluent; receiving water; sufficiently sensitive test methods and MLs
Reporting	Upon request	All discharges upon NOT; >12 months use NetDMR
Submittals	Hard copy accepted, fillable NOI, NOC and NOT, annual recertification required	Electronic format required as of 2020, fillable NOI, NOC, NOT, Appendix V and VI, Appendix VIII

---

---

---

---

---

---

---

---

---

---

## Major Changes Made in Response to Comments

Between 2016 Draft RGP & Final 2017 RGP

Selected Requirement	Draft Permit Requirement	Final Permit Requirement
Emergency Discharge Provision	Not included	14-day provisional coverage; notification required
NOI Timeframe	New Discharges submit NOI 30 days prior	New Discharges submit NOI 7 days prior
NOI Monitoring	Minimum of 1 influent and 1 effluent sample	Minimum of 1 influent sample
NOI Monitoring	NOI parameter applicability separate from effluent limitation applicability	Parameter applicability for NOI monitoring and effluent limitations identical; definitions provided
NOI Monitoring	Receiving water samples for pH, temperature, salinity or hardness; ammonia, and total metals if present	Receiving water samples for pH, temperature, salinity or hardness, ammonia; total metals if present and if a dilution factor applies
Monitoring Frequency Reduction	After 5 or 6 months and 5 or 10 samples	After 6 months and 10 samples
Laboratory Turnaround Times	3 or 5 days during first week, 10 days thereafter	5 days during first week, 10 days thereafter
Existing Data Substitution	Existing discharges	New & existing discharges; case-by-case allowances

---

---

---

---

---

---

---

---

---

---

## Minor Modifications to Date

Corrections Issued in Accordance with 40 C.F.R. Part 122.63(a) (Typographical Corrections)

- March 28, 2017: Appendix I  
Section II, Step 3 (instructions for FWS Criterion C)  
Section II, Step 4 (documentation for FWS Criterion C)  
cross-references to the criteria in Sections II and III
- April 19, 2017: General Permit  
footnote 7 to Table 2 (units for the ML requirement for ammonia)  
correction not needed for Appendix VII or Attachment A

---

---

---

---

---

---

---

---

---

---

### APPLICABILITY AND COVERAGE OF THE RGP – PART 1 OF THE PERMIT

- Part 1.1: [Subject Discharges](#)
- Part 1.2: [Geographic Coverage Area](#)
- Part 1.3: [Limitations on Coverage](#)
- Part 1.4: [Special Eligibility Determinations](#)
- Part 1.5: [Coverage Under the RGP](#)

---

---

---

---

---

---

---

---

### Subject Discharges Covered by the RGP

- ACTIVITY CATEGORY I: [Petroleum-Related Site Remediation](#)
- ACTIVITY CATEGORY II: [Non-Petroleum-Related Site Remediation](#)
- ACTIVITY CATEGORY III: [Contaminated Site Dewatering](#)
- ACTIVITY CATEGORY IV: [Pipeline & Tank Dewatering](#)
- ACTIVITY CATEGORY V: [Aquifer Pump Testing](#)
- ACTIVITY CATEGORY VI: [Well Development/Rehabilitation](#)
- ACTIVITY CATEGORY VII: [Collection Structure Dewatering/Remediation](#)
- ACTIVITY CATEGORY VIII: [Dredge-Related Dewatering](#)

---

---

---

---

---

---

---

---

### Activity Category I

- PETROLEUM-RELATED SITE REMEDIATION:

[Remediation of groundwater contaminated by petroleum products and related activities](#)



Photo: C. Vakalopoulos

---

---

---

---

---

---

---

---

### Activity Category II

- NON-PETROLEUM-RELATED SITE REMEDIATION:

Remediation of groundwater contaminated by volatile and semi-volatile organic compounds and inorganics, and related activities



Photo by EPA

---

---

---

---

---

---

---

---

### Activity Category III

- CONTAMINATED SITE DEWATERING:

Dewatering at former remediation sites, sites with no known source of contamination or sites where pollutants are naturally-occurring and related activities



Photo by EPA

---

---

---

---

---

---

---

---

### Activity Category IV

- PIPELINE & TANK DEWATERING:

Dewatering of pipelines, tanks, and similar structures and appurtenances that store or convey petroleum products, non-petroleum products, potable water, groundwater, and certain surface waters during construction of new structures or repair or maintenance of existing structures



Photos by EPA

---

---

---

---

---

---

---

---

### Activity Category V

• AQUIFER PUMP TESTING:

Short or long-term testing of a distinct contaminated or formerly contaminated aquifer(s), including when contamination is naturally occurring



Photo by I. Anderson

---

---

---

---

---

---

---

---

### Activity Category VI

• WELL DEVELOPMENT/ REHABILITATION:

Development or rehabilitation of groundwater monitoring, groundwater extraction, and water supply wells at contaminated or formerly contaminated sites, including when contamination is naturally occurring



Photo by DOE, Public Domain

---

---

---

---

---

---

---

---

### Activity Category VII

• COLLECTION STRUCTURE DEWATERING/ REMEDIATION:

Dewatering/remediation of structures utilized for collecting miscellaneous sources of water from contaminated or formerly contaminated sites or sources (e.g., sumps and dikes), including when contamination is naturally occurring or a result of the infiltration of contaminated groundwater or storm water



Photo by DOE, Public Domain

---

---

---

---

---

---

---

---

### Activity Category VIII

• DREDGE-RELATED DEWATERING:

Short-term dredging-related activities such as a short-term pilot study or similar activity associated with dredging, dredge material dewatering, including drain back waters and dewatering of contaminated solids



Photo by EPA

---

---

---

---

---

---

---

---

### Limitations On Coverage

**Discharges ineligible for coverage under the RGP:**

- 1. Discharges to outstanding resource waters in Massachusetts and New Hampshire:
  - a. Includes class A waters in Massachusetts
- 2. Discharges to class A waters in New Hampshire
- 3. Discharges that are likely to adversely affect any species listed as endangered or threatened under the endangered species act (ESA) or result in the adverse modification or destruction of critical habitat under ESA.
- 4. Discharges whose direct or indirect impacts do not prevent or minimize adverse effects on any designated essential fish habitat (EFH).

---

---

---

---

---

---

---

---

### Limitations On Coverage

**Discharges ineligible for coverage under the RGP:**

- 5. Discharges of pollutants identified as the cause of an impairment to receiving water segments unless the pollutant concentration is at or below a concentration that meets water quality standards.
- 6. Discharges to ocean sanctuaries in Massachusetts.
- 7. Discharges to territorial seas.
- 8. Discharges to a river designated as a wild and scenic river, except in accordance with 16 U.S.C. 1271 et seq.

---

---

---

---

---

---

---

---

### Limitations On Coverage

**Discharges ineligible for coverage under the RGP:**

- 9. Discharges which adversely affect properties listed or eligible for listing in the national registry of historic places under the national historic preservation act of 1966 (NHPA), 16 USC §470 et seq.
- 10. Remediation or dewatering discharges resulting from on-site response action conducted pursuant to §§104, 106, 120, 121 or 122 of the comprehensive environmental response, compensation, and liability act (CERCLA).
- 11. Discharges of uncontaminated effluent authorized or allowable under other united states environmental protection agency (EPA) permits.
- 12. Discharges to a publicly owned treatment works (POTW) which is permitted under section 402 of the CWA.
- 13. Discharges directly or indirectly to the ground subject to other program authority.

---

---

---

---

---

---

---

---

### Limitations On Coverage

**Discharges ineligible for coverage under the RGP:**

- 14. Discharge of dredge-related waters where the United States Army Corps of Engineers (ACE) intends to authorize the discharge under a CWA §404 permit.
- 15. New Sources, as defined in 40 CFR §122.2.
- 16. Discharges covered by an individual NPDES permit unless:
  - a. The discharges are separate from the currently permitted discharges; or
  - b. The discharges covered by an individual NPDES permit are eligible for this general permit.
- 17. Discharges for which the Director makes a determination that an

---

---

---

---

---

---

---

---

### Special Eligibility Determinations

- Endangered & threatened species and/or critical habitat:

Operators must demonstrate permit eligibility following the eligibility requirements in Appendix 1



Photo by EPA

<https://www3.epa.gov/region1/npdes/remediation/FinalAppendixI.pdf>

---

---

---

---

---

---

---

---

### Special Eligibility Determinations

- U.S. Fish & wildlife (FWS) eligibility criteria:

Criterion A: No species present

Criterion B: Species present but FWS issues determination of "no jeopardy" or "not likely to adversely affect"

Criterion C: Species present but operator determines "no effect"

- NATIONAL MARINE FISHERIES SERVICE (NMFS) ELIGIBILITY CRITERIA:

Criterion: Operator concurs with EPA's determination of "no effect" or "not likely to adversely affect"

---

---

---

---

---

---

---

---

### Special Eligibility Determinations

- U.S. Fish & wildlife (FWS) documentation requirements:

FWS IPaC Report or FWS correspondence

Brief assessment that addresses potential effects related to water quality, prey quality and habitat structure & disturbance

- NATIONAL MARINE FISHERIES SERVICE (NMFS) DOCUMENTATION REQUIREMENTS:

Brief assessment that addresses watershed location, receiving water type, presence of species & life stages and any prior consultation

---

---

---

---

---

---

---

---

### Special Eligibility Determinations

- National historic preservation act:

Operators must demonstrate permit eligibility following the eligibility requirements in Appendix III

<https://www3.epa.gov/region1/npdes/remediation/FinalAppendixIII.pdf>

---

---

---

---

---

---

---

---



**Special Eligibility Determinations**

- National historic preservation act eligibility criteria:
- Criterion A: No historic properties are present
- Criterion B: Historic properties are present but the discharge & related activities do not have the potential to affect historic properties
- Criterion C: Historic properties are present and the discharge & related activities have the potential to affect or will have an adverse effect on historic properties but the operator has obtained written agreement from historic preservation officer

---

---

---

---

---

---

---

---

**Coverage Under The RGP**

- TO OBTAIN AUTHORIZATION TO DISCHARGE UNDER THIS GENERAL PERMIT, AN OPERATOR MUST:
  1. Have a discharge type described in Part 1.1 of this general permit;
  2. Have a discharge located in the areas listed in Part 1.2 of this general permit;
  3. Meet the eligibility requirements in Part 1.3 and Part 1.4 of this general permit;
  4. Submit a complete and accurate Notice of Intent in accordance with the requirements of Part 3 of this general permit; and
  5. Receive a written authorization to discharge from EPA.
- TO MAINTAIN COVERAGE UNDER THIS GENERAL PERMIT, THE DISCHARGE MUST MEET APPLICABLE WATER QUALITY STANDARDS AND ALL EFFLUENT LIMITATIONS AND REQUIREMENTS IN THE PERMIT

---

---

---

---

---

---

---

---

**GENERAL PERMIT FOR REMEDIATION ACTIVITY DISCHARGES – PART 2 OF THE PERMIT**

- Part 2.1: Effluent Limitations & Monitor-Only Requirements
- Part 2.2: Water Quality-Based Effluent Limitations & Requirements
- Part 2.3: Massachusetts General Permit Limitations & Conditions
- Part 2.4: New Hampshire General Permit Limitations & Conditions
- Part 2.5: Special Conditions

---

---

---

---

---

---

---

---

### Effluent Limitations & Monitor-Only Requirements

- Chemical-specific effluent limitations & monitor-only requirements: [Table 2](#)
- effluent flow limitations: [Table 3](#)

---

---

---

---

---

---

---

---

### Applicability of Effluent Limitations & Monitor-Only Requirements

- Definitions of terms used for applicability:
  - [Known present](#)      [All Parameters](#)
  - [Believed present](#)    [Any Present](#)
  - [Known absent](#)        [If Present](#)
  - [Believed absent](#)

---

---

---

---

---

---

---

---

### Applicability of Effluent Limitations & Monitor-Only Requirements

- Minimum applicability: [Activity Category I](#)

Contamination Type	Parameter Applicability
A. Inorganics	All Parameters
B. Non-Halogenated VOCs	Any Present
C. Halogenated VOCs	If Present
D. Non-Halogenated SVOCs	Any Present
E. Halogenated SVOCs	If Present
F. Fuels Parameters	Any Present
Other	Effluent Flow, pH apply; temperature and other pollutants case-by-case

---

---

---

---

---

---

---

---

### Applicability of Effluent Limitations & Monitor-Only Requirements

- Minimum applicability:  
Activity Category II

Contamination Type	Parameter Applicability
A. Inorganics	All Parameters
B. Non-Halogenated VOCs	Any Present
C. Halogenated VOCs	Any Present
D. Non-Halogenated SVOCs	Any Present
E. Halogenated SVOCs	If Present
F. Fuels Parameters	If Present
Other	Effluent Flow, pH apply; temperature and other pollutants case-by-case

---

---

---

---

---

---

---

---

---

---

### Applicability of Effluent Limitations & Monitor-Only Requirements

- Minimum applicability:  
Activity Category III-G

Contamination Type	Parameter Applicability
A. Inorganics	All Parameters
B. Non-Halogenated VOCs	If Present
C. Halogenated VOCs	If Present
D. Non-Halogenated SVOCs	If Present
E. Halogenated SVOCs	If Present
F. Fuels Parameters	If Present
Other	Effluent Flow, pH apply; temperature and other pollutants case-by-case

---

---

---

---

---

---

---

---

---

---

### Applicability of Effluent Limitations & Monitor-Only Requirements

- Minimum applicability:  
Activity Category IV-G  
Activity Category V-G  
Activity Category VI-G  
Activity Category VII-G  
Activity Category VIII-G

Contamination Type	Parameter Applicability
A. Inorganics	If Parameters
B. Non-Halogenated VOCs	If Present
C. Halogenated VOCs	If Present
D. Non-Halogenated SVOCs	If Present
E. Halogenated SVOCs	If Present
F. Fuels Parameters	If Present
Other	Effluent Flow, pH apply; temperature and other pollutants case-by-case

---

---

---

---

---

---

---

---

---

---

### Applicability of Effluent Limitations & Monitor-Only Requirements

- Minimum applicability:  
 Activity Category III-H  
 Activity Category IV-H  
 Activity Category V-H  
 Activity Category VI-H  
 Activity Category VII-H  
 Activity Category VIII-H

Contamination Type	Parameter Applicability
A. Inorganics	All Parameters
B. Non-Halogenated VOCs	All Parameters
C. Halogenated VOCs	All Parameters
D. Non-Halogenated SVOCs	All Parameters
E. Halogenated SVOCs	All Parameters
F. Fuels Parameters	All Parameters
Other	Effluent Flow, pH apply; temperature and other pollutants case-by-case

---

---

---

---

---

---

---

---

---

---

### Effluent Limitations & Monitor-Only Requirements

- Parameters with specific exceptions to the applicability requirements:

Total Residual Chlorine	Polychlorinated Biphenyls
Cyanide***	Ethanol
1,4-Dioxane	Methyl tert Butyl Ether
Ethylene Dibromide	Tert Amyl Methyl Ether
Phthalates	

---

---

---

---

---

---

---

---

---

---

### Water Quality-Based Effluent Limitations & Requirements

- Pertain to the:  
 Water quality standards of the receiving water  
 Adequate treatment to meet narrative water quality standards for aesthetics & toxics  
 Toxics control, including requirements for any pollutant not limited by the RGP  
 Additional effluent limitations or monitoring requirements on a case-by-case basis

---

---

---

---

---

---

---

---

---

---

### Massachusetts & New Hampshire General Permit Limitations & Conditions

- pH limitations: [Table 4 MA](#), [Table 6 NH](#)
- Temperature limitations: [Table 5 MA](#), [Table 7 NH](#)
- State conditions

---

---

---

---

---

---

---

---

### Special Conditions

- Best management practices Plan (BMPP)
- Best management practices (BMPs)
- Conditions for discharges of chemicals & additives
- Conditions for pipeline & tank dewatering

---

---

---

---

---

---

---

---

### Best Management Practices Plan (BMPP)

- The BMPP documents the control measures selected to meet the following non-numeric technology-based effluent limitations:

Minimize the potential for violations of the terms of this general permit, taking corrective actions, when necessary

Minimize the number and quantity of pollutants and/or the toxicity generated, discharged, or potentially discharged at the site

Minimize discharges of pollutants from the remediation activities, including: material storage areas, on-site control measures and materials, treatment and material handling areas, loading and unloading operations, and accidental leaks or spills, including implementation of material compatibility and good house-keeping practices; and

Use pollution control technologies when necessary to meet the effluent limitations and requirements in this general permit, including the proper operation and maintenance of any treatment system.

---

---

---

---

---

---

---

---

### Best Management Practices Plan (BMPP)

- The BMPP must be:
  - A written document
  - prepared with good engineering practices
  - prepared in accordance with the timeframes in the permit
  - Certified upon submittal of a NOI (Statement Only)
  - Maintained on site
  - Updated as needed
  - Certified annually

---

---

---

---

---

---

---

---

### Best Management Practices Plan (BMPP)

- The minimum requirements include:
  - Name and location of the site
  - Any necessary system schematics, drawings or maps, including up to date site plans with a detailed outfall diagram
  - Identification and contact information for the operator(s)
  - Identification of potential sources of pollution
  - Description of the specific control measures used to reduce the discharge of pollutants
  - Description of the specific control measures selected to meet the specific BMP requirements in the RGP

---

---

---

---

---

---

---

---

### Best Management Practices (BMPs)

- The following BMPs are required of all operators:
  - Effluent Flow BMP
  - Preventative Maintenance BMP
  - Site Management BMP
  - Pollutant Minimization BMP
  - Administrative Controls BMP
  - Schedule for Inspections at least Monthly
  - Quality Assurance/Quality Control BMP
  - Materials Management BMP



Photo by C. Vakalopoulos

---

---

---

---

---

---

---

---

**Chemicals & Additives**

- Discharge of any chemical or additive, including, but not limited to: algaecides/biocides, antifoams, coagulants, corrosion/scale inhibitors/coatings, disinfectants, flocculants, neutralizing agents, oxidants, oxygen scavengers, pH conditioners, surfactants and bioremedial agents, including microbes

Is NOT authorized by the RGP unless reported in the NOI or through a subsequent Notice of Change (NOC)

---

---

---

---

---

---

---

---

**Pipeline & Tank Dewatering**

- Additional requirements apply
- Discharge of tank bottom water prohibited
- Pipelines & tanks must be pre-cleaned
- Water quality control measures
- Discharge of cleaning chemicals and additives prohibited
- Discharge of sludge prohibited

---

---

---

---

---

---

---

---

**Notice of intent (NOI) – Part 3 of the permit**

- PART 3.1: Obtaining Coverage
- PART 3.2: NOI Options
- PART 3.3: NOI Timeframes
- PART 3.4: NOI Requirements
- PART 3.5: When an Individual Permit may be Required
- PART 3.6: When an Individual Permit may be Requested
- PART 3.7: Determination of Coverage

---

---

---

---

---

---

---

---

**Notice of intent (NOI) – Part 3 of the permit**

- OBTAINING COVERAGE: [Submit a complete and accurate NOI](#)

---

---

---

---

---

---

---

---

**Notice of intent (NOI) – Part 3 of the permit**

- NOI OPTIONS: [Suggested NOI format, fillable electronic format preferred](#); or other official correspondence containing all information required in Appendix IV, Part 1

---

---

---

---

---

---

---

---

**Notice of intent (NOI) – Part 3 of the permit**

- NOI TIMEFRAMES:  
[Existing Discharges: July 7, 2017](#)  
[New Discharges: Minimum of 7 Days Prior to Desired Discharge](#)  
[Emergency Discharges: Notification within 24 Hours of Discharge Initiation and NOI Within 14 Days](#)

---

---

---

---

---

---

---

---



**Notice of intent (NOI) – Part 3 of the permit**

• MINIMUM REQUIREMENTS INCLUDE:

- General site information;
- Receiving water information;
- Source water information;
- Discharge information;
- Treatment system information;
- Treatment chemical/additive information;
- Determination of Endangered Species Act Eligibility;
- Documentation of National Historic Preservation Act Requirements;
- Supplemental Information; and
- Certification & Submission

---

---

---

---

---

---

---

---

**Notice of intent (NOI) – Part 3 of the permit**

• INSTANCES WHERE INDIVIDUAL PERMITS:

May be Required include: [A determination under 40 CFR §122.28\(b\)\(3\), non-compliance, water quality standards violation, actual or imminent harm, adverse impacts to ESA or EFH, RGP no longer appropriate](#)

Individual Permits May also be Requested by an Operator

---

---

---

---

---

---

---

---

**Notice of intent (NOI) – Part 3 of the permit**

• DETERMINATION OF COVERAGE:

- Made by EPA
- Provided to the operator in writing
- Effective upon the date indicated in the written authorization to discharge

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

- PART 4.1: [Monitoring Requirements](#)
- PART 4.2: [NOI Monitoring Requirements](#)
- PART 4.3: [Treatment System Monitoring Requirements](#)
- PART 4.4: [Short-Term Discharge Monitoring Requirements](#)
- PART 4.5: [Record-Keeping Requirements](#)
- PART 4.6: [Reporting Requirements](#)

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• MONITORING REQUIREMENTS:

[Monitoring Locations for Influent, Effluent & Receiving Water](#)

[Monitoring Frequency Monthly for Influent & Effluent beginning 30 days from the effective date of coverage for existing discharges and following completion of treatment system monitoring for new discharges or discharges re-initiated following shutdown](#)

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• MONITORING REQUIREMENTS:

[Test Methods must be those required in 40 CFR §136, or alternative test methods approved by EPA, in accordance with the procedures in 40 CFR §136, unless specifically prohibited in this general permit.](#)

[Note: Total analyses must be calculated for certain parameters \(e.g., total recoverable metals, total BTEX\)](#)

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• MONITORING REQUIREMENTS:

Minimum Levels must comply with the *National Pollutant Discharge Elimination System (NPDES): Use of Sufficiently Sensitive Test Methods for Permit Applications and Reporting rule*

When the sufficiently sensitive test method requirement is met, a parameter not detected above the detection limit (DL) can be considered known absent [https://www3.epa.gov/region1/npdes/remediation/AppendixVII\\_Resource.pdf](https://www3.epa.gov/region1/npdes/remediation/AppendixVII_Resource.pdf)

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• NOI MONITORING REQUIREMENTS:

The chemical-specific parameters required for NOI monitoring are identical to the parameters specified in the applicability of effluent limitations and monitor-only requirements in Table 2 of the RGP

Additional influent samples required: pH, temperature, ammonia, hardness when the receiving water is freshwater, salinity when the receiving water is saltwater

Additional receiving water samples required: Identical to the additional influent samples required noted above and total recoverable metals if present in the influent and if a dilution factor is approved

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• TREATMENT SYSTEM MONITORING REQUIREMENTS

Treatment System Startup:

Influent and Effluent

2/week during first week

1/week for 3 additional weeks

Monthly thereafter

Total of 10 samples over 6 months

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• TREATMENT SYSTEM MONITORING REQUIREMENTS

Treatment System Interruption:

Confirmatory sampling

Treatment system startup sampling

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• TREATMENT SYSTEM MONITORING REQUIREMENTS

Permanent Treatment System Shutdown:

Sample for all applicable parameters

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• Short-Term Discharge Monitoring Requirements

Pipeline & Tank Dewatering: Influent, in-process and effluent

Discharges Lasting 7 days or less: 2 samples of influent & effluent

Discharges lasting more than 7 days but less than 12 months:  
equivalent to discharges lasting greater than 12 months

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

- RECORD-KEEPING REQUIREMENTS: [Records content includes:](#)  
 Analytical data & reports  
 Sample collection information  
 BMPP,  
 Discharge monitoring data,  
 Monitoring, system operation & maintenance, inspections and employee training records

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

- RECORD-KEEPING REQUIREMENTS  
 ON-SITE RECORDS:  
 Permit & Authorization, including any modifications  
 Copies of information submitted to EPA, the State, and municipality  
 Copy of the BMPP  
  
 Retain records for a minimum of 3 years

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

- REPORTING REQUIREMENTS  
 Discharge Monitoring Reporting through NetDMR required for discharges lasting 12 months or more; electronic submission required  
 Discharge Monitoring Reporting through NetDMR is not required for discharges lasting less than 12 months  
  
<https://www3.epa.gov/region1/npdes/netdmr/index.html>

---

---

---

---

---

---

---

---

**Monitoring, record-keeping & reporting requirements – Part 4 of the permit**

• REPORTING REQUIREMENTS

Additional data reporting requirements include as attachments to NOI, NOC & NOT

Analytical laboratory reports must be attached to data submissions

---

---

---

---

---

---

---

---

**Notification Requirements**

• THE FOLLOWING NOTIFICATION REQUIREMENTS ARE INCLUDED IN THE RGP:

Regulatory notification in accordance with 40 CFR §122.44(f)

Written notifications to EPA and the State

Verbal notifications to EPA and the State

---

---

---

---

---

---

---

---

**Notification Requirements**

• THE FOLLOWING ACTIONS ARE REQUIRED UPON DISCOVERY OF A VIOLATION OF A PERMIT LIMITATION OR REQUIREMENT, AT A MINIMUM:

The discharge must stop immediately, unless instructed otherwise by EPA and/or the appropriate state;

Minimize or prevent the discharge of pollutants until a permanent solution is achieved;

Notification must be provided to EPA and to the appropriate state within twenty-four hours; and

The cause of the permit violation must be identified and corrective action must be initiated within seventy-two (72) hours.

---

---

---

---

---

---

---

---

**Administrative requirements – Part 5 of the permit**

- Notice of change (NOC): [Operators use as-needed Appendix IV, Part 2](#)
- Notice of termination (NOT): [Required of all operators Appendix IV, Part 3](#)

---

---

---

---

---

---

---

---

**Notice of Change (NOC)**

- Eligible changes may consist of a request to:
  - [Reduce Monitoring Requirements](#)
  - [Change Effluent Flow Limitation](#)
  - [Change pH Limitations \(NH ONLY\)](#)
  - [Change Authorized Pollutants](#)
  - [Discharge Chemicals or Additives](#)

---

---

---

---

---

---

---

---

**Notice of Change (NOC)**

- Eligible changes may consist of a notification of:
  - [Change to Administrative Information](#)
  - [Change in Discharge Location](#)
  - [Change in Activity Area](#)
  - [Change to a Treatment System or Process](#)
  - [Discharge Interruption of 90 or more days](#)

---

---

---

---

---

---

---

---

**Notice of Change (NOC)**

- A NOC must include:
  - Minimum General Site Information
  - Indication of the Request or Notification
  - Narrative Statement, Including any Required Rationale or Supporting Documentation
  - Monitoring Data, if Required (Appendix VIII)

---

---

---

---

---

---

---

---

**Notice of Termination (NOT)**

- Required for all discharges: No later than 30 days following the identification of a condition requiring a NOT
- Use of Appendix IV, Part 3 in electronic format
- Failure to submit a NOT results in a continuation of all general permit requirements: Including all monitoring, record-keeping and reporting requirements

---

---

---

---

---

---

---

---

**Notice of Termination (NOT)**

- Conditions requiring a NOT:
  - All discharges covered under the RGP have been terminated;
  - Coverage under an individual or other general NPDES permit has been obtained;
  - There is a change in operator; or
  - Authorization to discharge has expired and coverage under a new general permit will not be requested.

---

---

---

---

---

---

---

---



**Notice of Termination (NOT)**

- a NOT must include:
  - Minimum general site information;
  - Indication that all discharges have been permanently terminated;
  - The reason for termination;
  - The dates of the initiation and the termination of discharge, the daily maximum effluent flow, and the frequency of discharge.
  - A summary of all monitoring results from the initiation of discharge through termination; use of Appendix VIII electronic format preferred

---

---

---

---

---

---

---

---

---

---

**Permit Expiration**

- The 2017 RGP Expires: April 8, 2022
- Administrative continuation:
  - In accordance with the Administrative Procedure Act in the event the RGP is not reissued prior to April 8, 2022
  - Remains in force and effect for any authorized operator until reissued,
  - an individual discharge is terminated, an individual NPDES permit is issued
  - or a formal decision not to reissue the permit
  - New discharges cannot be authorized after expiration

---

---

---

---

---

---

---

---

---

---

**Standard conditions – Part 6 of the permit**

- Appendix IX: Conditions specified in the NPDES regulations common to all NPDES permits

---

---

---

---

---

---

---

---

---

---

**Additional permit conditions applicable to specific states – Part 7 of the permit**

• Reserved: [No conditions currently included in this part](#)

---

---

---

---

---

---

---

---

**Questions?**

---

---

---

---

---

---

---

---

**Break: 15 min**

---

---

---

---

---

---

---

---