



NPDES: Potable Water Treatment Facility General Permit MAG640000 & NHG640000

February 16, 2022

Presented by Nathan Chien, EPA Region 1 Water Division

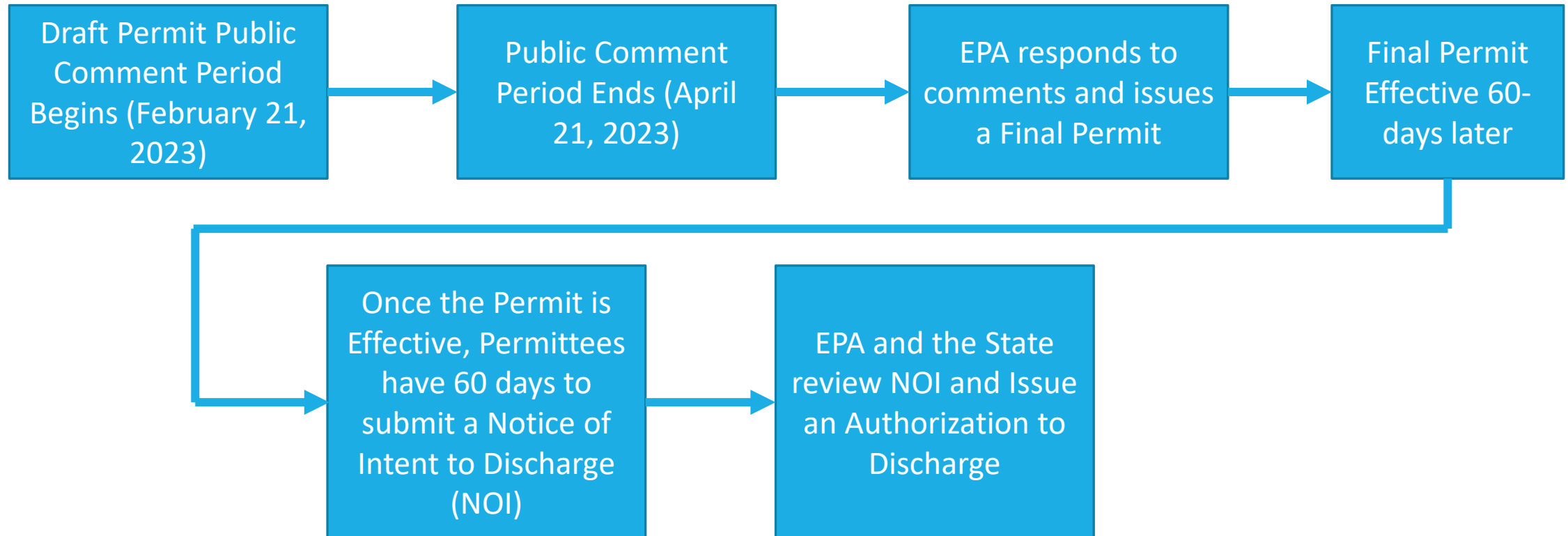


Agenda

1. NPDES Permit Renewal Process: Overview and Timeline
2. Major Permit Changes
3. Applying for Coverage
4. MassDEP Permitting Changes and Outreach
5. Questions



NPDES Permit Renewal Process





Major Permit Changes

See Section 1.0 of the Fact Sheet for a list of changes.

1. Aluminum Limits
2. Ambient Monitoring Related to Aluminum Limits
3. WET Testing Changes
4. PFAS Monitoring Added
5. Phosphorus Monitoring Expanded
6. Additional Special Conditions
7. Prohibition on New or Increased Discharges



Major Changes: Aluminum Limits

- In Massachusetts, EPA conducted a “reasonable potential analysis” to determine if limitations were necessary to protect water quality using MassDEP’s new Massachusetts watershed default criteria. Taking into account:
 - New Watershed Default Aluminum Criteria: <https://www.mass.gov/doc/fresh-water-aquatic-life-water-quality-criteria-for-aluminum-methodology-for-deriving-watershed-default-criteria-cn-5610/download>
 - Dilution Factor (Facility-specific and developed by MassDEP)
 - Effluent and Receiving Water Aluminum Data
- In New Hampshire, EPA’s reasonable potential analysis used New Hampshire’s existing aluminum aquatic life criteria. No new aluminum limits in New Hampshire.
- See Appendix H (Site Specific Effluent Limits)



Major Changes: Ambient Monitoring

- Ambient Monitoring Related to Aluminum Limits
 - Quarterly: Total Aluminum, Dissolved Organic Carbon (DOC), Total Hardness (as CaCO_3) and pH
- Limits may change during next permit term.
- See MassDEP's: Fresh Water Aquatic Life Water Quality Criteria, <https://www.mass.gov/regulations/314-CMR-4-the-massachusetts-surface-water-quality-standards> for methodology for calculating site-specific limits.
- In New Hampshire, no eligible facilities discharge frequently enough to require ambient monitoring.



Major Changes: Whole Effluent Toxicity Testing (WET)

- Some permittees will now have acute (LC50) limits and chronic (C-NOEC) limits if the toxicity data indicated reasonable potential to violate water quality standards.
- Chronic WET testing is no longer required for facilities with dilution factors $> 20:1$.
- Reporting is required during the same calendar quarter instead of rotating quarters.



Major Changes: PFAS Monitoring

- Semi-annual effluent PFAS monitoring for at least 3 semi-annual periods.
- Request to remove monitoring requirement after those 3 periods if:
 1. PFAS was not detected and
 2. Discharge is not from treated groundwater and
 3. Discharge is not directly to or upstream of a drinking water treatment source.



Major Changes: Phosphorus Monitoring

- Total Phosphorus monitoring for facilities that:
 1. Use and discharge phosphorus-containing chemicals and
 2. Discharge to fresh waterbodies and
 3. Have a dilution factor less than 50:1



Major Changes: New Special Conditions

1. Dilution Factor Study (Massachusetts Permittees)
2. Compliance Schedules

Both must be requested/submitted as part of your NOI.



Major Changes: New or Increased Discharges

- The General Permit no longer allows new or increased discharges from being covered.
- If you are seeking NPDES permit coverage for a new or increased discharge you may need an individual permit. Contact the Permit Writer to determine if this is the case.



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Applying for Coverage

1. 60-day deadline for submitting NOI from the permit effective date
2. Fill out Appendix G - Notice of Intent to Discharge (NOI)
 - a. Identify if compliance schedule is needed
 - b. Identify if Facility-specific Dilution Study will be performed
3. Submit NOI to both EPA and your State Agency (MassDEP or NHDES)



2023 Draft Potable Water Treatment Facility General Permit (Draft PWTF GP)

EPA Region 1 is issuing a renewal of the National Pollutant Discharge Elimination System (NPDES) General Permit for discharges from Potable Water Treatment Facilities (Draft PWTF GP). This draft permit is meant to replace the 2017 PWTF GP. The Draft PWTF GP establishes effluent limitations and requirements, effluent and ambient monitoring requirements, reporting requirements, and standard conditions for certain eligible dischargers in Massachusetts and New Hampshire. Specifically, the Draft PWTF GP will cover discharges of wastewater generated from common water treatment processes such as clarification, coagulation, media filtration, and disinfection from potable water treatment facilities. See below for copies of the draft permit and associated documents as well as instructions on commenting on the Draft PWTF GP.

How to Submit Comments

EPA has published a Notice of Availability for this Draft General Permit in the Federal Register [\[add hyperlink once we have\]](#). The Draft General Permit, Fact Sheet, and supporting information are provided on this webpage. Comments must be submitted by the close of the comment period [\[Date TBD\]](#) electronically to the following email address: Chien.Nathan@epa.gov.

Draft PWTF GP Documents

- [Draft Potable Water Treatment Facility General Permit \(pdf\)](#) (505 K)
- [Appendix A - Freshwater Acute Toxicity Test Procedure and Protocol, February 2011 \(pdf\)](#) (98 K)
- [Appendix B - Freshwater Chronic Toxicity Test Procedure and Protocol, April 2013 \(pdf\)](#) (80 K)
- [Appendix C - Marine Acute Toxicity Test Procedure and Protocol, July 2012 \(pdf\)](#) (63 K)
- [Appendix D - Marine Chronic Toxicity Test Procedure and Protocol, November 2013 \(pdf\)](#) (125 K)
- [Appendix E - Endangered Species Act Guidance and Eligibility Criteria \(pdf\)](#) (289 K)
- [Appendix F - National Historic Preservation Act Review Requirements \(pdf\)](#) (519 K)
- [Appendix G - Notice of Intent \(NOI\) Instructions \(pdf\)](#) (381 K)
- [Appendix H - Site Specific Effluent Limitations \(pdf\)](#) (123 K)
- [Appendix I - Reasonable Potential Analysis and Limit Derivation \(pdf\)](#) (212 K)
- [Appendix J - PFAS Analyte List \(pdf\)](#) (229 K)
- [Appendix K - List of Eligible Facilities \(pdf\)](#) (97 K)
- [Fact Sheet \(pdf\)](#) (519 K)

Contacts

EPA: Nathan Chien (Chien.Nathan@epa.gov) 617-918-1649
Massachusetts Department of Environmental Protection: Xiaodan Ruan (Xiaodan.ruan@mass.gov) 857-256-4172
New Hampshire Department of Environmental Services: Hayley Franz (Hayley.Franz@des.nh.gov) 603-271-0671

Comment Period:
2/21-4/21/2023

Appendix H will list
out the site specific
effluent limitations
for your facility

Fact Sheet
explains/justifies
the entire draft
permit

Appendix G has a
fillable PDF for the
NOI

Website will be "live"
on Tuesday 2/21



NPDES and MassDEP Permitting

- Until June 2020, EPA and MassDEP jointly issued NPDES permits and state surface water discharge permits as one document.
- Agencies now issue two separate permits.
- MassDEP generally incorporates EPA permit into the state permit and, if necessary, adds any state-only requirements.



MassDEP Permitting

- Review state draft GP at: <https://www.mass.gov/service-details/massdep-public-hearings-comment-opportunities>
- Comments on the state GP should be sent to massdep.npdes@mass.gov
- Once the permit is finalized, facilities need to submit a NOI for coverage under the state permit (WM15 application - <https://www.mass.gov/how-to/wm-15-npdes-general-permit-notice-of-intent>).
- Facilities will be notified by MassDEP when their coverage is approved and will receive the effective date of said coverage.



MassDEP Compliance Assistance

- For facilities that will receive aluminum limits, MassDEP will hold outreach sessions to provide the compliance assistance; also, any facility that is concerned about their aluminum limit can reach out to us, as well.



MassDEP Compliance Assistance Contacts

- Regional Wastewater Section Chiefs
 - CERO: David Boyer, david.boyer@mass.gov
 - NERO: Susy King, susannah.king@mass.gov
 - SERO: Dave Burns david.burns2@mass.gov
 - WERO: Daniel Kurpaska, daniel.j.kurpaska@mass.gov
- Regional Drinking Water Section Chiefs
 - CERO: Robert Bostwick, robert.bostwick@mass.gov
 - NERO: Kristin Divris (DRD and Acting Drinking Water Section Chief), kristin.divris@mass.gov
 - SERO: James McLaughlin, james.m.mclaughlin@mass.gov
 - WERO: Deirdre Doherty, deirdre.doherty@mass.gov



Questions?

Please reach out to me with any unanswered questions after this meeting at Chien.Nathan@epa.gov or (617) 918-1649.

MassDEP Contact: Xiaodan Ruan Xiaodan.Ruan@mass.gov or (857) 256-4172

NHDES Contact: Hayley Franz Hayley.Franz@des.nh.gov or (603) 271-0671