

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RIPDES REMEDIATION GENERAL PERMIT (RGP)



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RIPDES REMEDIATION GENERAL PERMIT (RGP)

- Re-Issuance Schedule
- Permit Development
- Proposed Changes



REMEDIATION GENERAL PERMIT (RGP) RE-ISSUANCE SCHEDULE

- 2013 RGP Expired September 30, 2018
- Draft RGP being reviewed by EPA Region 1
- Public Notice Draft RGP -- TBD
- Public Comment -- TBD
- Public Hearing -- TBD
- Continuance of current permit, until permit reissuance (~February – March 2018)



RGP PROPOSED CHANGES: *ELECTRONIC SUBMISSION OF NOI'S*

CURRENT PERMIT:

- *HARD COPY SUBMISSION OF NOI*

PROPOSED PERMIT:

- *PART I.B.2: ELECTRONIC REPORTING LANGUAGE FOR SUBMISSION OF NOI'S ADDED. DEPENDENT ON ELECTRONIC REPORTING TOOL BECOMING AVAILABLE.*



RGP PROPOSED CHANGES: DEADLINE TO SUBMIT A NEW NOI

CURRENT PERMIT:

- DEADLINE TO SUBMIT A NEW NOI IS (90) DAYS PRIOR TO COMMENCEMENT OF DISCHARGE

PROPOSED DRAFT:

- PART I.B.3: REVISED DEADLINE TO SUBMIT A NEW NOI IS (30) DAYS PRIOR TO COMMENCEMENT OF DISCHARGE



RGP PROPOSED CHANGES: POLLUTANTS NOT COVERED BY RGP

CURRENT PERMIT:

- REGARDLESS OF CERTIFICATION OF CHEMICALS AS 'BELIEVED ABSENT' THE DIRECTOR MAY REQUIRE MONITORING OF SPECIFIC PARAMETERS

PROPOSED DRAFT:

- PART II.A.6: REGARDLESS OF CERTIFICATION OF CHEMICALS AS 'BELIEVED ABSENT' OR NOT BEING LISTED IN THE MONITORING REQUIREMENTS FOR CATEGORIES A – J, THE DIRECTOR MAY REQUIRE MONITORING OF SPECIFIC PARAMETERS ON A CASE-BY-CASE BASIS.



RGP PROPOSED CHANGES: *REDUCTION IN MONITORING FREQUENCY*

CURRENT PERMIT:

- TO BE ELIGIBLE PERMITTEE MUST PROVIDE SUMMARY OF TREATMENT SYSTEM PERFORMANCE.

PROPOSED DRAFT:

- *PART II.A.6.D: PERMITTEE MUST PROVIDE INFLUENT AND EFFLUENT DATA FOR A MINIMUM OF (6) CONSECUTIVE MONTHS AND (10) SAMPLES FOR EACH PARAMETER FOR WHICH REDUCTION IS BEING REQUESTED.*



RGP PROPOSED CHANGES: DISCHARGE OF CHEMICALS AND ADDITIVES



CURRENT PERMIT:

- THE APPLICATION MUST INCLUDE A DESCRIPTION OF ANY CHEMICAL ADDITIVES BEING USED, OR PLANNED TO BE USED, AND MUST INCLUDE MSDS ASSOCIATED WITH EACH ADDITIVE.

PROPOSED DRAFT:

- PART II.A.9/II.F.4.D: REQUESTS THE NOI PROVIDE MORE DETAILED INFORMATION REGARDING THE USE OF CHEMICAL /ADDITIVES IN TREATMENT SYSTEMS (E.G. PRODUCT NAME/CHEMICAL FORMULA/MANUFACTURER, PURPOSE, SDS/CAS, DOSING RATE AND METHOD OF DOSING , MATERIAL COMPATIBILITY RISKS, AQUATIC TOXICITY, ETC.) **SEE RGP EXCERPT

RGP PROPOSED CHANGES: PCB SAMPLING METHODOLOGY

CURRENT PERMIT:

- NO ALTERNATE METHOD PROPOSED.

PROPOSED DRAFT:

- PART II.B.1.B.III: ADDED METHOD 1668C TO BE USED AS A SUBSTITUTE FOR CWA METHODS 608 AND 625.



RGP PROPOSED CHANGES: *RECORDKEEPING REQUIREMENTS*

CURRENT PERMIT:

- INCLUDED PART III.O MONITORING AND RECORDKEEPING REQUIREMENTS.

PROPOSED DRAFT:

- PART II.B.3: ADDED MORE PRESCRIPTIVE RECORDKEEPING REQUIREMENTS REGARDING ON-SITE RECORDS AND RETENTION (E.G. COPY OF RGP, COPY OF AUTHORIZATION, COPIES OF CORRESPONDENCE FROM DEM AND/OR MUNICIPALITY, RECORDS OF SYSTEM OPERATION AND MAINTENANCE / SITE INSPECTIONS / TRAINING / FIELD MONITORING, VISUAL OBSERVATIONS, ETC.)



RGP PROPOSED CHANGES: MONITORING AND REPORTING

CURRENT PERMIT:

- MONITORING RESULTS REPORTED ON QUARTERLY DMR FORMS TO BE SUBMITTED HARDCOPY TO DEM BY THE 15TH DAY OF THE MONTH FOLLOWING THE REPORTING QUARTER.

PROPOSED DRAFT:

- PART II.B.4: UPDATED LANGUAGE TO INCLUDE ELECTRONIC SUBMISSION OF DMRS USING NETDMR ([HTTPS://NETDMR.EPA.GOV](https://netdmr.epa.gov)) FOR DISCHARGES LASTING (12) MONTHS OR MORE. DISCHARGES LASTING LESS THAN (12) MONTHS MAY SUBMIT HARDCOPY DMRS.



RGP PROPOSED CHANGES: MONITORING AND REPORTING (CONT.)

CURRENT PERMIT:

- SEE PREVIOUS SLIDE.

PROPOSED DRAFT:

- PART II.B.4: UPDATED REPORTING REQUIREMENTS TO CLARIFY WITH REPORTS/REQUESTS SHALL BE SUBMITTED TO DEM AS ATTACHMENTS IN NETDMR OR AS A HARDCOPY TO DEM.
 - NETDMR ATTACHMENT: DMR COVER LETTER, BDL SUMMARY TABLE, SUMMARY OF HYDROTEST WATER TRANSFER.
 - HARDCOPY SUBMISSION: TRANSFER OF PERMIT, CHANGE IN SAMPLING LOCATION, NOTICE OF DISCHARGE OF POLLUTANTS NOT LIMITED IN PERMIT, REQUEST FOR REDUCTION IN MONITORING FREQUENCY, NOTICE OF UNAUTHORIZED DISCHARGE, ETC.



RGP PROPOSED CHANGES: MONITORING AND REPORTING (CONT.)

CURRENT PERMIT:

- PART II.A.7 AND II.B.2 REQUIRES 24 HOUR NOTIFICATION TO DEM WITH TREATMENT SYSTEM MALFUNCTION OR VIOLATION OF EFFLUENT LIMITS.

PROPOSED DRAFT:

- PART II.B.4: UPDATED THE NOTIFICATION REQUIREMENTS ABOVE AND OF PART III TO BE MORE PRESCRIPTIVE.
 - VERBAL REPORTS OR VERBAL NOTIFICATIONS
 - TWENTY-FOUR HOUR REPORTING: NONCOMPLIANCE THAT MAY ENDANGER HEALTH OR THE ENVIRONMENT BY CALLING DEM
 - WRITTEN SUBMISSION: PROVIDED WITHIN (5) DAYS OF BECOMING AWARE OF CIRCUMSTANCES



RGP PROPOSED CHANGES: EFFLUENT LIMITATIONS AND MONITORING

CURRENT PERMIT:

- SEE PARTS II.D – E OF 2013 RGP

PROPOSED DRAFT:

- PART II.D - E: REVISED POLLUTANT EFFLUENT LIMITS AND/OR MONITOR ONLY REQUIREMENTS AS NOTED BELOW.
 - ADDED AMMONIA AND ETHANOL FOR DISCHARGES TO AA, NON-AA, SA, AND SB WATERS
 - ADOPTED THE MOST STRINGENT OF RI WQ ACUTE AND EPA 2017 RGP TBEL AS DAILY MAX. (TSS, ACETONE, 1,4-DIOXANE, TOTAL PHTHALATES, TOTAL GROUP 1 PAHS FOR FRESHWATER AND SALTWATER RECEIVING WATERS; METALS FOR VARIOUS DILUTION RANGES FOR FRESHWATER RECEIVING WATERS; AND CADMIUM, CHROMIUM III, CHROMIUM VI, AND LEAD FOR SALTWATER RECEIVING WATERS)
 - UPDATED SOME MONTHLY AVERAGE LIMITS TO BE EQUAL TO DAILY MAXIMUM LIMITS WHERE MONTHLY AVERAGE > DAILY MAXIMUM (MAINLY FOR METALS WITH TBEL LIMITS DISCHARGING TO FRESHWATERS)



RGP PROPOSED CHANGES: *DILUTION DETERMINATION*

CURRENT PERMIT:

- SEE CURRENT DILUTION DETERMINATION WORKSHEET.

PROPOSED DRAFT:

- REVISED DILUTION DETERMINATION WORKSHEET TO INCLUDE THE USE OF USGS STREAMSTATS WEBSITE TO DETERMINE 7Q10 FLOWS FOR RI WATER BODIES.
 - [HTTP://WATER.USGS.GOV/OSW/STREAMSTATS](http://water.usgs.gov/osw/streamstats)
 - INCLUDE PRINTOUT OF STREAMSTATS REPORT WITH NOI AND DILUTION WORKSHEET, WHICH INCLUDES 7 DAY 10 YEAR LOW FLOW.



RGP PROPOSED CHANGES: *OTHER CHANGES*

PROPOSED DRAFT:

- PART II.G: UPDATED QUANTITATION LIMIT TABLE (ADOPTED MORE STRINGENT OF AVAILABLE QLS/MLS PER 2017 EPA RGP.
- REVISED NOI FORM TO REFLECT THE ADDITION OF NEW POLLUTANTS (AMMONIA, ETHANOL) AND CHEMICAL ADDITIVE REQUIREMENTS.

QUESTIONS?

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