

General Electric Company Pittsfield Draft NPDES Permit

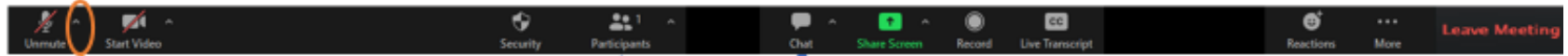


Informational Meeting

November 8, 2023



Zoom Meeting Controls



Click to **mute / unmute** your microphone.

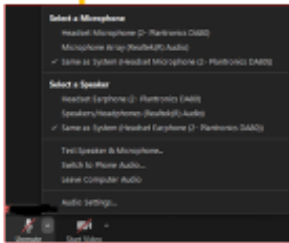
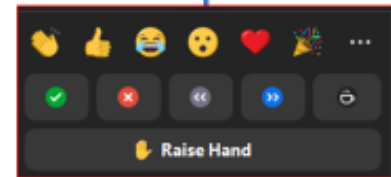
Click to **start / stop** your camera.

Click to show a list of other **participants** in the meeting.

Rename:
Hover over your name, click **More**

Click to open the **Chat** panel where you can start or respond to a chat.

Click to **leave meeting**. You will not interrupt the meeting



AUDIO/SOUND TROUBLESHOOT:
Click the "up arrow" (next to the mic icon) to open **audio settings**.
Be sure to have "**Same as System**" selected, under Microphone and Speaker.

Calling via mobile phone, dial *6 to Mute/Unmute | Dial *9 to Raise virtual hand

Presenters

Damien Houlihan, Chief
Stormwater Permits Section
EPA Region 1 Water Division



Shauna Little, Permit Writer
Stormwater Permits Section
EPA Region 1 Water Division

David Boyer, NPDES Chief
Bureau of Water Resources
MassDEP



Ground Rules for Online Participation

Our requests:

- Keep your microphone muted when not speaking
- When providing comments, please unmute and turn your camera on (if you prefer to use video)
- Respect time limits for comments
- Keep comments respectful and appropriate for a public audience
- Follow the facilitators' guidance and instructions on how to participate



Presentation Overview



- Description of the NPDES permit process
- Description of the Facility
- Description of the draft permit requirements
- Opportunities for public participation



Purpose of a NPDES Permit

- The goal of the National Pollutant Discharge Elimination System (NPDES) program, in general, is to address water pollution by regulating point sources that discharge pollutants to waters of the United States through the issuance of permits.
- The permits establish requirements, like limits on the amount of pollutant that can be discharged and monitoring to demonstrate the requirements are met. Permits can also impose best management practices, like engineering controls, to reduce or eliminate pollutants.
- The requirements are established to ensure that the receiving water achieves and maintains the state's water quality standards for that water body. For example, if the water body is designated by the state for uses such as swimming and fishing, the permit includes requirements that enable the water body to achieve and maintain those uses.
- The permit for the GE facility has been developed in accordance with these goals. Please also see <https://www.epa.gov/npdes/npdes-permit-basics> for a very good introduction to the Clean Water Act's NPDES program.



Federal NPDES Permit Process

- The Facility has an administratively continued NPDES permit that was issued on September 30, 2008, and modified on August 10, 2009.
- EPA issued a new draft permit on September 19, 2023
- EPA will accept public comments on the draft permit until December 20, 2023 (originally November 19, 2023)
- EPA will host a Public Hearing following this informational meeting



Federal NPDES Permit Process

Cont.

- EPA will review all public comments submitted, and then prepare a written response to comments
- EPA will issue a final permit with any changes made as a result of those comments and explanations for such changes
- Permit conditions can be appealed to the Environmental Appeals Board (EAB)



Massachusetts Permit Process

- EPA is NPDES permitting authority in Massachusetts
- 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 the EPA permit (by reference) into the state permit and, if necessary, adds any state-only requirements
- State draft permit and draft Water Quality Certification can be reviewed at <https://www.mass.gov/info-details/massdep-permits-approvals-for-comment>
- Comments on the State permit or the Water Quality Certification should be submitted to massdep.publiccommentnpdes@mass.gov (note the new email address)
- 60-day public notice period was extended by 30 days to 12/20/23



Types of Discharges

- Stormwater
- Groundwater
- Potable Water
- Water generated from certain remedial activities
- Other allowable non-stormwater discharges



Housatonic River Outfalls

Outfall Number	Outfall Location	Type of Discharge(s)
Outfall 005	At the discharge point to the Housatonic River	64G + 64T discharges
Outfall 64G	At the discharge point of the Building 64G treatment system	groundwater, potable water, BMP-related wash waters, and water generated from certain remedial activities
Outfall 64T	At the discharge point of the Building 64T treatment system	stormwater, groundwater infiltration and potable water
Outfall 05A	At the discharge point to the Housatonic River following treatment through OWS 64-W	stormwater and potable water
Outfall 05B	At the discharge point to the Housatonic River	stormwater and potable water
Outfall 006	At the discharge point to the Housatonic River following treatment through OWS 64-X	stormwater and potable water
Outfall 06A	At the discharge point to the Housatonic River	stormwater and potable water
Outfall SRO5	At the discharge point to the Housatonic River	stormwater and potable water
YD 13	At the discharge point to the Housatonic River	stormwater
YD 16	At the discharge point to the Housatonic River	stormwater

Unkamet Brook Outfalls

Outfall Number	Discharge Location	Types of Discharge(s)
Outfall 009	At the discharge point of OWS 119-W following treatment through OWS 119-W	stormwater and potable water
YD 10	At the discharge point to the Unkamet Brook	stormwater
YD 12	At the discharge point to the Unkamet Brook	stormwater

Numeric Limits

- Technology-based limits
 - Total Suspended Solids
 - Oil & Grease
 - Polychlorinated Biphenyls
- Water quality-based limits
 - pH
 - Polychlorinated Biphenyls
 - Whole Effluent Toxicity
- Monitoring Only Requirements
 - Polychlorinated Biphenyls
 - Volatile and Semi-Volatile Organic Compounds
 - Per and Polyfluoroalkyl Substances



Limits Comparison

Parameter	Typical 2008/2009 Requirement	Typical Draft 2023 Requirement
pH (SU)	6.5 to 8.5	6.5 to 8.5
Total Suspended Solids (mg/L)	Report except Mass limits at 005, 009	30 and Mass limits at 005, 009
Oil & Grease (mg/L)	15 and Mass limits at 005, 009 except Report at 64G	15
Polychlorinated Biphenyls ($\mu\text{g/L}$)	Report except 0.014 at 64G Mass limits at 005	Report 0.000064 at 005 0.01 at 64G
Volatile Organic Compounds ($\mu\text{g/L}$)	None except Report at 64G	Report
Semi-volatile Organic Compounds ($\mu\text{g/L}$)	None except Report at 64G	Report
Per- & Polyfluoroalkyl Substances (ng/L)	None	Report
Whole Effluent Toxicity Testing (LC_{50})	None except Report at 64G	$\text{LC}_{50} \geq 100\%$

Special Conditions

- Stormwater Pollution Prevention Plan (SWPPP)
- Best Management Practices (BMPs)
 - General stormwater control measures (SCMs)
 - Such as: good housekeeping, preventative maintenance, SCMs to prevent impacts from storm and flood events
 - General administrative controls
 - Such as: employee training
 - Site-specific SCMs
 - Such as: cleaning & inspection, elimination of bypasses and dry weather flow, elimination of PCB discharges



Special Conditions Cont.

- Prohibited discharges
 - Liquid or solid hazardous waste
 - Groundwater except via 64T/64G
 - Aqueous Film-Forming Foam
- Additional non-numeric water quality-based limits
 - MA narrative water quality standards (aesthetics)
- Routine inspections
- Corrective actions in the event of a limit exceedance
- Additional conditions for treatment chemicals/additives



MassDEP Surface Water Discharge (SWD) Permit Requirements

- Incorporates by reference all terms and conditions of the EPA NPDES permit
- PFAS:
 - The permittee shall submit to MassDEP an evaluation of whether any products containing PFAS are stored onsite and whether use or storage of those products can be reduced or eliminated
 - All PFAS results (NPDES and SWD) are uploaded to MassDEP database by the testing laboratory are available to the public via a public portal located at:
<https://eeaonline.eea.state.ma.us/portal#!/search/npdes>



Draft Permits Available for Review

All documents may be downloaded and printed from EPA's website: (Adobe Acrobat Reader is required)

<https://www.epa.gov/ma/public-notice-draft-permit-general-electric-company-pittsfield-pittsfield-ma-ma0003891>

Print copies are also available at:

EPA Records Center
5 Post Office Square, Boston
(617) 918-1990
(Please call to schedule an appointment)



Questions During the Public Comment Period:

Questions Regarding the
NPDES Permit

Shauna Little
Physical Scientist
EPA Region I – New England

little.shauna@epa.gov

Office: 617-918-1989



To Submit Comments:

EPA is seeking your feedback and comments on the draft permit during public comment period

- September 19, 2023 - December 20, 2023

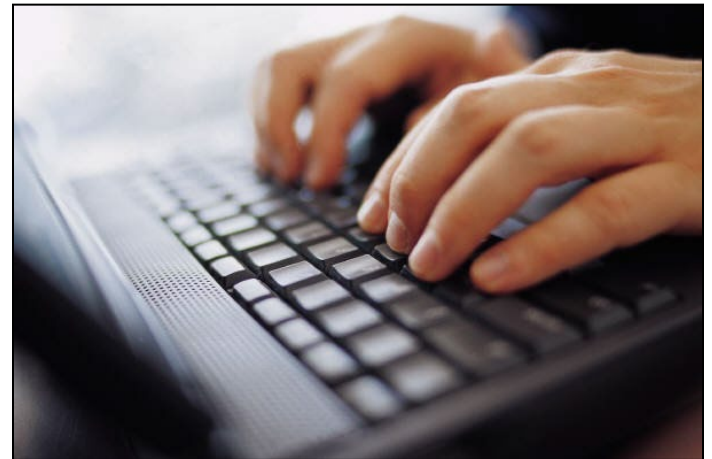
Oral comments can be provided at the Public Hearing following this informational meeting

Written comments can be sent to:

Shauna Little

little.shauna@epa.gov

Fax: (617) 918-0989



Q&A: How to Participate Via Zoom

- Raise your “virtual” hand to get in the speaking queue.
- You can also type questions via chat
 - Facilitator will periodically turn to questions/comments from the chat and read them aloud
- The phone line will periodically be unmuted so participants can ask spoken questions
- Understand that we may not get to all questions today (spoken or via chat)

