



## CUMBERLAND COUNTY CONSERVATION DISTRICT

### CCCD NPDES Webinar 10/22/2020 Q&A

- 1 Will there be link to the uTube videos on your website?  
**Yes, link to our channel is on our website.**
- 2 Can you describe the 'Non Discharge Alternatives" criteria? I understand that means managing volume rate and quality of the 2-year 24 hour storm..  
**Non-Discharge Alternative will eliminate the net change in stormwater volume, rate and quality up to and including the 2yr/24hr storm. (From Module 3)**
- 3 Are electronic signatures acceptable for the NOI through means such as Adobe Sign or DocuSign?  
**We received clarification from DEP, that typed or other electronic signatures are acceptable at this time, which may change in the future.**
- 4 For #5 on Eligibility...the threshold for 'No net change to volume rate and quality to a MS4 or CSO..is that for just the 2-year/24 hr storm?  
**No, it is either 2yr/24hr for volume/water quality or all design storms for rate. Form 3800-FM-BCW0271F guides you for filling out information for the proper storm.**  
Does discharging to storm sewers mean it's discharging to a non-surface water? And does that mean you need a discharge analysis to the surface water? Or is that more related if your site discharges to a channel for example at the edge of your site?  
**If the discharges from your project connect to anything other than the receiving surface water that is indicated in the NOI form then you have a discharge to non-surface waters and are required to provide an analysis/demonstration that the flows will not change conditions downstream. The off-site discharges fact sheet provides information on what should be included in the analysis.**
- 6 Do the municipal / county forms need to be sent to them every time the LOD changes?  
**If the LOD change triggers an amendment, then yes.**
- 7 Is applicant required to send NOI to DEP (if CCD is reviewing), or does applicant submit a copy to CCD to forward to DEP?  
**The new instructions indicate that the applicant sends a copy of the NOI to DEP directly.**  
Do the new County and Municipal Forms also cover the Land Use Policy Notifications? Many project involve other DEP
- 8 permits that require notifications to the County and Municipalities regarding compliance with their Zoning and Comprehensive plans  
**That would depend on those other permits notification requirements for which you are applying.**
- 9 With many people working remottely, why does DEP still need "wet" signatures on the GIF and PNDI?  
**That is a good question and should be directed to DEP.**
- 10 So, if we get authorized on Oct. 2, our client can't begin earthwork until Nov. 1, the new effective date?  
**Correct.**
- 11 Your presentations refer to the use of a 'Narrative" however the FAQs and instructions from DEP note that they are trying to eliminate the submittal of a 'Narrative"...which does CCCD prefer?  
**Supporting documentation for most projects is necessary. We call it a narrative in our presentations because that's what it has been traditionally called. Moving forward supporting documentation does not have to be provided formally in a "narrative" however it does need to be part of the application.**
- 12 If wetlands are located on the site, but not within the NPDES boudary that we set, do we need a wetland determination?  
**No, you would not, however, if there are wetlands close to your project, we would look at the scope of your project and the resulting hydrologic impact to the wetlands, and then coordinate appropriately with DEP. The standard for providing a wetland determination is hydric soils within your project/NPDES boundary.**
- 13 For depth of soil, for linear restoration projects, we do not have soil analysis. I reference the NRSC Soil Survey. In this case, what does soil depth refer to?

In the web soil survey report, you can use a depth from the *Properties and Qualities section, depth to restrictive feature* of the report for each soil type.

- 14 Strom Event: is that 1/4" within a 24hr period for inspection purposes?  
Yes, according to the instructions, An inspection must be conducted within 24 hours following a 24-hour period in which at least 0.25 inch of precipitation occurs, or when snowmelt occurs that is sufficient to produce a discharge.
- 15 With regard to placing narrative descriptions on the application forms, the instructions from DEP specifically state that the applicant may note another location for the information. Is that the case?  
See 21.
- 16 At least at one point, the DEP worksheet applied a factor of safety. Are we supposed to use the one calculated in the spreadsheet in the module or the infiltration rate as would be shown in the infiltration report?  
A factor of safety should be applied before it is entered into the spreadsheet.
- 17 Many O&M notes are lengthy and formatted for clarity and will not fit well within the provided space on PCSM Module 2. Is it acceptable to mark the space "See Attached" and attach the formatted notes to the end of the  
Yes
- 18 Additionally, the drawings are what is recorded that often contain the O&M information. The NOI is not recorded and nobody will see it in the future. I agree that a reference to where the O&M is found is more appropriate.  
See 21.
- 19 Has determination of whether a project requires an individual vs general permit changed?  
No.
- 20 Page 24 of Instructions:  
See 21.  
Page 24 of Instructions: Sequence and Critical Stages. Describe the sequence of PCSM BMP implementation in relation to earth disturbance activities. Additionally, ensure that the critical stages of the PCSM BMP installation are identified and schedule of inspections for the critical stages is provided. If the sequence and critical stages are provided on the PCSM Plan Drawings, then identify this in the space provided (including the location in the drawings).  
We reached out to DEP, their intent is to reference drawings for these items in Module 2 if the notes were comprehensive. The intent wasn't to require a detailed explanation in module 2 plus place a drawing page number.
- 22 Are we able to view a copy of the spreadsheet with the formulas visible? We would find it beneficial to help make sense of where all of the numbers are coming from.  
We do not have a copy of the spreadsheet with formulas visible, however many of the output results are described in the instructions and provide the rationale for the product. From Sean Furjanic, DEP....."if they have a specific question about a formula, I can provide the actual formula along with an explanation of what it is doing. Just need the worksheet name and the cell or column they are interested in."  
Page 29 of NOI Instructions: ....Long-Term O&M
- 23 List each PCSM BMP (including site restoration) and report the O&M requirements, including the repair, replacement, or other routine maintenance needs, including a schedule. If the long-term O&M requirements are provided on the PCSM Plan Drawings, identify the location(s) in the Plan Drawings in the "O&M Requirements" section  
See 21.
- 24 Does it matter if the spreadsheet says the rate sheet is/is not required since only the volume worksheet is required?  
The spreadsheet will indicate if the project qualifies for the small site exemption which does not require the analysis of rate. The use of the spreadsheet is only required for water quality. However, in order to complete the Quality worksheet the Volume worksheet must be filled in.  
Per the instructions, DPs are also POIs; however, it also says that DPs are also BMP outlet locations. Based on current guidance from the DEP hotline, a project can be set up either way using DPs as POIs at the edge of a property or as
- 25 BMP outlets. IF DPs are listed as individual BMP outlets rather than individual POIs, how does this work with the PCSM Spreadsheet since DPs can't be tributary to another DP, but you could have multiple BMPs outletting to a POI at the edge of the property. – Essentially a "combine" option like in Hydraflow is needed to use individual BMPs as DPs.

The drainage areas for each BMP that is leaving the project at the same POI should be analyzed using a new PCSM Spreadsheet. Or, if the POI leaving your project boundary contains multiple BMP's discharging at the same point then a separate analysis that combines the results of the individual BMP discharges should be attached to the PCSM Spreadsheets.

26 Is site restoration considered a non-structural BMP? Should vegetation maintenance be included in the Long Term O&M?

Yes. For the purposes of NPDES permitting the restoration of a site after earth disturbance activity has occurred site restoration is considered a "BMP". Instructions for the restoration of all areas need to be included in the plan along with O&M notes if necessary (i.e. a paved road would not need O&M). Additionally, the Cumberland County Conservation District highly recommends that the restoration process be listed as a critical stage that is observed by a professional or their designee and be certified at the conclusion of the project.

27 How do the undetained areas work with the DPs? In various places of the instructions, undetained areas are not tributary to a DP, so they're a site bypass that sheetflows over the property line and specifically NOT to a POI. When you use BMP outlets as DPs, however, you get volume credit for undetained pervious areas because there is a volume reduction through evapotranspiration and/or infiltration in undetained areas that do not flow to a structural BMP (page 7 of instructions). You don't get that same volume credit if your POI is at a property corner or property line, etc. Why wouldn't you still get credit if it's based on undetained pervious areas that aren't tributary to structural BMPs?

The undetained pervious credit is provided to address areas like the outside of berms of BMP's that cannot be managed through the BMP. If there are areas of your project that are undetained and sheet flow off the site then those areas need analyzed separately.

28 For the volume worksheet, does the Infiltration Time include any time during the 24-hour storm, or should it start after the 24-hour storm? Is this value supposed to be the same as dewatering time?

Yes, this is the dewatering time. The actual computed dewatering time should be entered here. Exaggerated (i.e., too short or too long) durations will negatively affect the infiltration credit calculations. The actual time the infiltration time begins should be when the BMP first receives indirect runoff.

29 For the rate worksheet, is rate required to be reduced to each DP? This could be problematic if BMP outlets are your DPs and multiple actually end up going in the same general direction to a traditional POI.

If BMP outlets are your DPs, how do pre-development analyses work?

A summation of all rates from BMPs to the same discharge point can be included separately that shows the overall post-development rate is reduced. The pre-development analysis should be evaluated at the POI from the site and should not take into consideration BMP outlets.

30 The new way of looking at water quality eliminates the use of pollutant removal efficiency percentages and instead looks at BMP outflows. This method contradicts intuition in that it's now more beneficial to have most effective BMPs as the last BMP in a series of BMPs, whereas the old version requires most effective BMPs to be at the upstream-most position in the series. In a practical sense, why would you apply your best treatment BMP at the source (good environmental stewardship) when the new calculations have more of an incentive to put your most effective BMPs at the downstream end closest to the POI?

Flexibility is provided within the Water Quality worksheet to include water quality benefits from non-structural BMPs, like street sweeping. Also, the designer has the ability to uncheck the "Use default BMP Outflow and Median BMP Outflow Concentrations" box and provide an alternate water quality compliance demonstration. If an alternate method is followed then supporting documentation must be provided that supports the analysis.

31 For non-structural BMPs, removal efficiencies are still required based on a modified version of worksheet 13... when you include the removals from any non-structural BMPs in the PCSM spreadsheet, are you still comparing apples to apples since the new methodology looks at outflows rather than removal efficiencies?

The information that is entered for the non-structural BMPs is the water quality credit, or remaining pollutant load after the non-structural BMP function. You do not input the non-structural BMP removal efficiency. Using Worksheet 13 to determine the water quality credit is an acceptable method and should be attached to the Spreadsheet as supporting calculations.

32 How do non-structural BMPs in series with structural BMPs work? It feels like it would be double-dipping to not have the weighted outflow.

Designers have the ability to modify the PCSM Spreadsheet if necessary to fit their particular situation. If this is done then supporting documentation must be attached. What is this particular scenario?

**33** DEP doesn't have the online Chapter 105 process established yet. How do they expect to have the online 102 program setup in two months?

Chapter 102 ePermitting has been in development for several years, it has been tested by DEP and Conservation Districts to hopefully be a good product upon release.

**34** Will the presentation slides be posted on CCCD's website?

Yes, we will save the presentations as pdf's and post them on our webpage.

**35** Is there a process to get Fees confirmed ahead of actually submitting an application?

The Conservation District is happy to review the calculated fees before submission. When requesting fee confirmation please include all necessary information for determining the appropriate fees.

**36** Will we all get responses to the posted questions/comments? If so, how and where will they be found?

They will be posted on our website.

So from DEPs standpoint, written consent is not needed from downstream property owners as long as discharge is

**37** proven to be equal or less than pre-construction and otherwise no additional impact to receiving property? regardless of whether the municipality may have such an ordinance requirement?

The information provided by DEP for this topic is strictly informational and let's the applicant know of their legal obligation. The Department, and the Conservation District, do not need to see any documentation related to this topic.

**38** Perhaps less report narrative or no report narrative is needed considering the detailed information required in the NPDES forms?

Formal written "narratives" are no longer required as part of the E&S/NPDES permitting process. However, all required information must still be included in the application.

**39** My question related to volume credits from undetained areas is outdated (whoops!). It still applies for water quality credits though.

See 27.