

From the desk of Jamy B. Madeja, Esq.,

MMTA General and Government Relations Counsel
jmadeja@buchananassociates.com

617-227-8410

This is a reminder to all marinas and boatyards that currently have stormwater runoff 2015 Multi-Sector General Permits from the federal Environmental Protection Agency. The reminder is to file your annual report by January 30, 2017 (and your quarterly reports, per below)

The U.S. EPA has published the following reminder (as summarized):

Please note that under the 2015 MSGP, each facility must submit its **annual report** BY JANUARY 30th, 2017! The report is a summary of the past year's monitoring, inspections, and corrective actions. The four requirements to the annual report are:

- 1. Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit).
- 2. Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).
- 3. For any four-sample (minimum) average benchmark monitoring exceedance, if after

and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

4. Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

To begin your report please log into your CDX account at https://cdx.epa.gov/cdx/Login and if you do not have an account yet, you can register through the same link.

Also under the 2015 MSGP, do not forget to perform your **quarterly monitoring** as required at least once during:

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January 1 – March 31;
April 1 – June 30;
July 1 – September 30;
October 1 – December 31.
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If you are labeled Sector Q- Water Transportation you must sample for:

- Aluminum (benchmark monitoring concentration of 0.75 mg/l)
- Iron (benchmark monitoring concentration of 1.00 mg/l)
- Lead (benchmark monitoring concentration of 0.21 mg/l SALTWATER ONLY)
 *Check your permit for freshwater limits
- Zinc (benchmark monitoring concentration of 0.09 mg/l SALTWATER ONLY)
 *Check your permit for freshwater limits
- Copper (benchmark monitoring concentration of 0.0048 mg/l)

in you are labeled decici it. Only and boat building and tepair it ards you must sample for:

- Aluminum (benchmark monitoring concentration of 0.75 mg/l)
- Iron (benchmark monitoring concentration of 1.00 mg/l)
- Lead (benchmark monitoring concentration of 0.21 mg/l SALTWATER ONLY)
 *Check your permit for freshwater limits
- Copper (benchmark monitoring concentration of 0.0048 mg/l)

To upload your quarterly monitoring results, you must go to

https://netdmr.epa.gov/netdmr/public/login.htm

For helpful guidance to assist you with data entry, please consider watching this tutorial https://epawebconferencing.acms.com/p6zody33lpm/

Please note in addition to your quarterly monitoring samples, you may need to sample for fecal coliform once a year to be included in your annual report (if your "receiving waters" are impaired for this element). Fecal coliform must be reported within 8 hours of testing and must be in a sanitary container. You must test for fecal coliform if your receiving waters have previously contained traces of such bacteria and are considered impaired.

As always, please call or email me with any questions you may have regarding the 2015 MSGP and your responsibilities under it.

MASSACHUSETTS MARINE TRADES ASSOCIATION
P.O. Box 6133, Plymouth, MA 02362-6133
(774) 404-8005

WWW.BOATMA.COM INFO@BOATMA.COM