

Public Participation in Maryland's NPDES Permitting Program, a Citizen Guide

Toolkit for developing and advertising your local training

This toolkit includes:

- Tips on how to pick an audience and set a training date and location
- Advertisement example language and templates
 - a. social media templates
 - b. email advertisement template
 - c. promotional flyer example
 - d. press release example and template
- Draft agenda



CHESAPEAKE
LEGAL ALLIANCE



Pick an Audience

Think about what groups you currently have a partnership with.

Think about where the majority of your permitted facilities or the largest permitted facilities exist, and then identify groups near those areas.

This can include your current membership, your local partners helping to protect clean water, watershed protection groups, neighborhood groups, cultural groups, planned growth groups, organized communities, and interested citizens.

Pick a Date and Location for Your Training

If you're planning to reach a larger audience consider offering an online training or an in-person training at a popular location.

Go to your audience - if your focusing on getting support for a specific permit, identify the groups potentially impacted by that facility's pollution discharge and offer to attend their monthly membership meeting, present at a Home Owner Association meeting, or ask interested groups to help organize the training and recruit participants.

Advertise Through Social Media, Email Lists, and Press Release

Social media posts – templates:

1. As a citizen are you concerned about industrial waste polluting your local waters? Join us for a training on [DATE] on the Citizen's Guide to pollution permits and learn how you can protect your favorite rivers from permitted polluters. To RSVP please contact [ORGANIZER'S CONTACT INFORMATION].
2. The [NAME] River has over [X] facilities that have a permit to discharge their waste directly into the waterway. Join us for a training on [DATE] to learn how you as a citizen can protect your local waterway from these polluters. Click here [WEBSITE REGISTRATION LINK] to RSVP for this one-hour training. [INSERT SCREENSHOT OF LOCAL ECHO SEARCH]
3. Join us for a free training on ways that you as a citizen can reduce sources of local water pollution. The *Public Participation in Maryland's NPDES Permitting Program, a Citizen Guide* is a tool designed to introduce citizens to MD's permit program that controls discharges of pollution into local waterways. This training will teach you how to review a NPDES permit, request a public hearing, and comment on a NPDES permit. Contact [ORGANIZER'S CONTACT INFO.] today to RSVP.

**Add the cover of the Citizen Guide as an image attached to your advertising.

Email advertisement - template:

Subject: Join [HOSTING ORGANIZATION] for a citizen training [WORKSHOP OR WEBINAR] on Maryland's NPDES Permit Process

Dear [MEMBER NAME or NETWORK GROUP],

Organizations, local groups, and citizens wishing to actively contend with water pollution, have a new guide to assist them - *Public Participation in MD's NPDES Permitting Program, a Citizen's Guide*.

Maryland's National Pollution Discharge Elimination System (NPDES) program governs the discharging of waste to any surface water or groundwater within the state's jurisdiction. These permits limit the quality and quantity of waste that a facility can discharge, although often times the permit limits are not in the best interest of improving water quality, and often lack enforceable conditions.

The good news is that Maryland's NPDES program offers adequate opportunity for the public to participate in the permitting process and advocate for stricter permit limits and more enforceable permit conditions. The Citizen's Guide, designed as a tool for the beginner citizen, identifies the opportunities to participate in the permitting process and provides tips from professionals that work on these permits every day.

Join [HOSTING ORGANIZATION] for a training on [DATE] on the Citizen's Guide and learn how to review a NPDES permit, request a public hearing, and comment on NPDES permits right in your watershed.

Don't let another 100,000 gallons of waste to be discharged in your local streams without holding polluters accountable. Details for the workshop are below:

Date:

Time:

Location:

RSVP:

Questions:

Sincerely,
[ORGANIZER]

Promotional flyer - example:

JOIN the
Chesapeake Legal
Alliance,
along with the
Midshore Riverkeeper
Conservancy,
in a citizen training webinar
on Maryland's NPDES Permit
Process
on
Wed., July 26 at noon

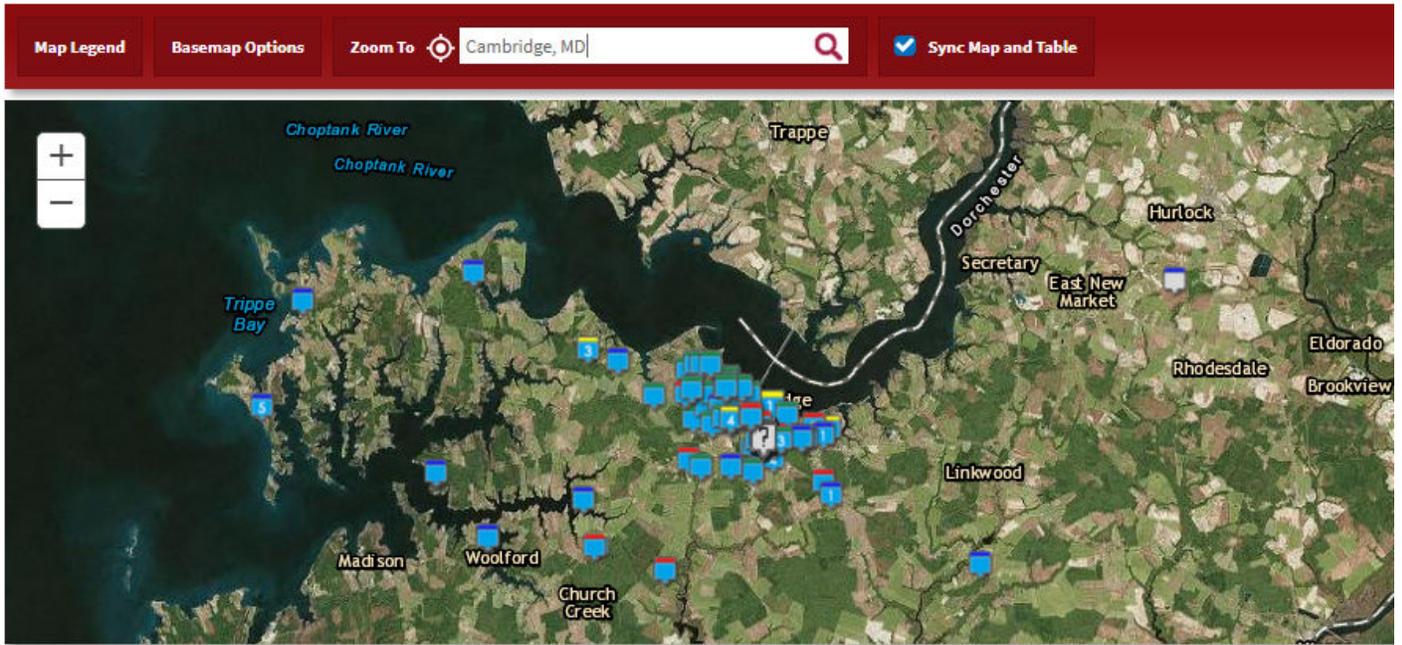
Citizen Guide
Public Participation in Maryland's
NPDES Permitting Program



Organizations and citizens wishing to actively contend with water pollution, have a new guide to assist them! [This webinar will teach how to: review a NPDES permit, request a public hearing, and comment on a NPDES permit.](#)

REGISTER TODAY for the webinar, please click here:
<https://attendee.gotowebinar.com/register/3114390159166009089>

ECHO database screenshot for advertising - example:



Press release – example:



www.chesapeakelegal.org
info@chesapeakelegal.org

FOR IMMEDIATE RELEASE

Media Contact:
Mary Clemmensen
mclemmensen@chesapeakelegal.org
410-216-9441

(Annapolis, MD) July 13, 2017

CHESAPEAKE LEGAL ALLIANCE LAUNCHES CITIZENS GUIDE

Organizations and citizens wishing to actively contend with water pollution, have a new guide to assist them. Chesapeake Legal Alliance (CLA) and Midshore Riverkeeper Conservancy (MRC), with assistance from Jill Grant & Associates, have developed the [Citizen Guide to Public Participation in Maryland's National Pollutant Discharge Elimination System \(NPDES\) Permitting Program](#). To facilitate and encourage public involvement, the guide outlines Maryland's NPDES permitting process and provides tools and tips to assist citizens analyze and comment on NPDES permits in Maryland. **The Guide is available for download from the CLA website at chesapeakelegal.org.**

CLA and MRC are also hosting a companion training webinar on July 26 at Noon to teach the basic concepts covered in the guide. [REGISTER TODAY](#) for the webinar.

Although the guide and webinar are designed for residents of Maryland, much of the information applies to the public comment process for Clean Water Act discharge permits generally and so may be useful to residents of other states as well.

CLA is a not-for-profit organization dedicated to using the law to improve the quality of the Chesapeake Bay. CLA coordinates a network of *pro bono* lawyers who volunteer their time and professional skills, free of charge, to representing environmental organizations, citizens' groups, and individuals in their efforts to improve the health of the Chesapeake Bay and its watershed.

MRC is a nonprofit organization dedicated to the restoration and protection of the Choptank, Miles, and Wye Rivers, Eastern Bay, and all of their tributaries. The organization serves as an advocate for the health of these tributaries and the living resources they support.

For more information, please contact Chesapeake Legal Alliance Staff Attorney, Mary Clemmensen at 410.216.9441; mclemmensen@chesapeakelegal.org or Choptank Riverkeeper Matt Plata at 443.385.0511; matt@midshoreriverkeeper.org

Press Release – template:

[YOUR LOGO]

[YOUR WEBSITE URL]

[ORGANIZATION CONTACT EMAIL ADDRESS]

FOR IMMEDIATE RELEASE

Media Contact:

[ORGANIZATION CONTACT NAME]

[ORGANIZATION CONTACT EMAIL ADDRESS]

[OFFICE PHONE NUMBER]

[(City, MD) DATE]

[ORGANIZATION NAME] LAUNCHES CITIZEN TRAINING

Organizations and citizens wishing to actively contend with water pollution, have a new training to assist them. [ORGANIZATION NAME] will be hosting a citizen training to help community members learn how they can become advocates for local waterways. This training will help citizens learn how they can help reduce the amount of pollution going into their local rivers and streams. This training is free and open to the public.

Training participants will learn how Maryland regulates direct sources of pollution going into waterways and how citizens can advocate for reducing sources of pollution through the public participation process. This training is based on the guide, *Citizen Guide to Public Participation in Maryland's National Pollutant Discharge Elimination System (NPDES) Permitting Program*. This guide outlines Maryland's NPDES permitting process and provides tools and tips to assist citizens analyze and comment on NPDES permits in Maryland. The Guide is available for download from the [ORGANIZATION NAME] website. [LINK TO YOUR WEBSITE AND THE GUIDE]. [ORGANIZATION NAME] is hosting this water advocate training on [DATE] at [TIME] to teach the basic concepts covered in the guide. This training will be held at [LOCATION NAME].

[REGISTER HERE] for the training.

[INCLUDE A PARAGRAPH HERE DISCUSSING YOUR ORGANIZATION, ITS MISSION AND HOW THIS TRAINING CONNECTS TO THAT MISSION]

For more information, please contact [ORGANIZATION CONTACT TITLE, NAME at PHONE NUMBER]; [CONTACT EMAIL].

Training Agenda – template:

Public Participation in Maryland’s NPDES Permitting Program *a citizen training*

Date:

Time:

Location:

Agenda

1. The Importance of NPDES Permits
 - Review local NPDES Permits on ECHO website
2. What is a NPDES Permit
 - What is a Pollutant
 - Who needs a NPDES Permit
 - Point Source Pollution
3. Maryland’s NPDES Permit Program
 - Application Received; Public Notified
 - Permit Drafted; Informational Meeting Held Upon Request
 - Draft Permit Released; Public Comment Accepted; Public Hearing Held Upon Request
 - Public Comments Considered; Final Determination and Permit Issued
 - Challenges to Final Permits
4. Get Involved
 - Pre-Application
 - Develop an understanding of state and federal laws
 - Investigate point sources in your area
 - Investigate current and past water quality
 - Take photos, document conditions, and note GPS locations
 - Get Notice of the Permit & Map the Timeline
 - Contact MDE and ask about being placed on contact lists + sign up for MDE’s Direct Notice Mailing List
 - Watch your local newspaper
 - Watch the Maryland Register – general permit notices will appear here
 - Visit MDE’s Public Notices and Information website to see current public notices
 - Consider Strategy and Partnering with Others
 - Reach out to [ORGANIZATION NAME HERE]
 - If you need legal help reach out to the Chesapeake Legal Alliance
 - Contact partner organizations
 - Consider who has “Standing”
 - This is critical and should be considered early and often throughout the process
 - Gather Important Documents + Information

- Determine the Water Quality Standards
 - Maximum permissible pollutant criteria required to maintain the uses
 - Narrative water quality criteria
 - Anti-degradation water tiers
 - Analyze the Permit + Request Public Hearing
 - Review the permit
 - If the permit public notice does not indicate that a public hearing has already been scheduled, then consider submitting a public hearing request
 - Prepare for and Attend the Public Hearing
 - Submit Written Comments
 - Write a letter to MDE with your comments, concerns, and recommendations for the permit
 - Final Permit Approval + Enforcement
 - If the final permit incorporates your comments – Congratulate yourself!
 - If you disagree with MDE's final permit decision, consider retaining legal counsel
5. Hands-on Example
 6. Get Started!
 7. Share the guide: *Citizen Guide to Public Participation in Maryland's National Pollutant Discharge Elimination System (NPDES) Permitting Program*