

NPDES Industrial Stormwater General Permit Training



South Carolina's proposed permit is based on EPA's Multi-sector General Permit (MSGP), issued in September 2008.

There are **27** Sectors in South Carolina's proposed permit including one titled "Non-classified."

Each Sector has some combination of best management practices, effluent limits, and/or benchmarks.

A Stormwater Pollution Prevention Plan (SWPPP) must be developed to address how a site will maintain compliance with the general permit.

Outline

Additions

Deletions

Modifications

FAQ (Frequently Asked Questions)

Additions

BENCHMARK

Pollutant concentrations intended to improve a site's stormwater best management practices. An indicator.

Consists of an average of 4 quarterly samples.

An exceedance does not constitute a violation. A permittee simply retests until they pass or claim no further reduction is "technologically available or economically feasible."

There are natural background allowances.

Additions (cont.)

WATER QUALITY MONITORING

Pertains to monitoring for discharges to impaired waterbodies that do NOT have a total maximum daily load (TMDL) developed.

Impaired waterbody monitoring – yearly

- Dissolved oxygen, temperature - no monitoring
- “Bio” - no monitoring until a TMDL is approved
- Suspended solids, turbidity, or sediment - TSS is monitored
- Mercury or polychlorinated biphenyls (PCB) – no monitoring (yet)

Additions (cont.)

WATER QUALITY MONITORING (cont.)

For impaired waterbodies without a developed TMDL, if you do not detect the pollutant(s) of concern, monitoring can stop. If it is believed the detection is caused by natural background, monitoring can stop along with justification.

If detected, continue yearly monitoring.

Additions (cont.)

VISUAL ASSESSMENT

Grab sample taken quarterly and viewed in a clear, easily observed container.

Qualitatively analyzed for:

- Color
- Odor
- Clarity
- Floating/settled/suspended solids
- Foam
- Oil sheen
- Other indicators of stormwater pollution

Additions (cont.)

ROUTINE INSPECTION

Walking your site while it is operating

Must be performed at a minimum of every quarter

One routine inspection must be during a stormwater discharge

There are exceptions available for inactive and unstaffed sites

Additions (cont.)

Sector AD or “non-classified” Sector - Department’s discretion as to requiring coverage. Intended for special cases and will be used infrequently. Similar to 1.3.A.2 of the old permit.

Stormwater ponds installed under a construction-activity stormwater permit will be kept and maintained for industrial operation.

Deletions

SARA Title 313 requirements –3.4.F, 5.2.B.1, Appendix C, et. al. of old permit. Only mentioned in new permit in relation to deicing chemicals in 2.1.2.7.b. (not allowed)

Toxicity – 5.2.B. & C. and 5.3 of old permit

Nonmetallic mineral mining – no longer covered by this permit. Covered by SCG730000.

Deletions (cont.)

Coal mining and oil/gas exploration - no longer covered by this permit

Alternative certification – 5.2.G. of old permit

Modifications

Effluent monitoring. Previous permit had two effluent limits (water line flushing and coal pile runoff). The new permit has seven Sectors with effluent limits, some with more than one pollutant/parameter.

Coverage under the new permit is granted 17 days after receipt of an administratively complete NOI; not 9 days after postmark.

Annual comprehensive inspection now requires a review of the TMDL list and all monitoring/inspection data.

Modifications (cont.)

A qualifying rain event for sampling was 0.1 inch of rainfall and 72 hours since the last 0.1 inch or greater event in the old permit. Now only the 72 hour criteria must be met.

Representative discharge (old permit) = substantially identical outfall (new permit)

The permit adds a fecal coliform benchmark (the Freshwater stream standard) for domestic wastewater treatment plants (Sector T), meat packing plants (Sector U), wool scouring plants (Sector V), and rawhide/leather plants (Sector Z).

Modifications (cont.)

For the site map, these items have been added:

- Size of property in acres
- Receiving waters, and if impaired or if TMDL
- All stormwater conveyances (pipes, ditches)
- Locations of stormwater monitoring points
- All stormwater inlets & outfalls must have unique IDs and each outfall treated as “substantially identical” must be noted
- MS4, where your stormwater discharges to them
- Location and description of non-stormwater discharges
- Location and source of run-on of pollutants from adjacent property, if applicable

FAQ

Q: Will I need to recertify under the new permit?

A: Yes

Q: Is the recertification application available?

A: Yes, the Notice of Intent (NOI) is DHEC Form 2629 and is available on the Stormwater website (www.scdhec.gov/stormwater) and the EQC Forms website.

FAQ (cont.)

Q: Will I need to pay the \$75 fee?

A: No. In fact DHEC Form 2629 does not have any mention of fees or methods of payment.

Q: When is it due?

A: April 1, 2011

Q: Will my certification number change?

A: No

FAQ (cont.)

Q: Is the No Exposure certification still available?

A: Yes. It remains unchanged.

EPA 833-B-00-001

Q: When should the SWPPP be updated?

A: At the time of submittal of the recertification NOI.

Q: Does DHEC have a SWPPP template available?

A: Yes. See our Stormwater website.

FAQ (cont.)

Q: What are the starting points for monitoring and inspections?

A: All inspections started on the effective date (1/1/11) of the permit. This includes the routine, comprehensive, and visual assessments.

Benchmarks start 4/1/11 and follow quarterly.
Numeric effluent limits also start 4/1/11 and follow annually.

FAQ (cont.)

Q: What are the starting points for monitoring and inspections? (cont.)

A: (cont.)

Impaired water monitoring starts on 10/1/11 and follows annually.

TMDL monitoring started 1/1/11. However the frequency of sampling is 4 times/12 month period and the first sample must be taken no later than the third quarter (7/1/11 – 9/30/11).

FAQ (cont.)

Q: The hardness adjustment for metal benchmarks must be determined when and how?

A: The receiving water hardness must be determined before or at the time of the first benchmark sample. You or a group of permittees discharging to the same waterbody may determine the value or third party data is acceptable as long as it is in compliance with 40 CFR 136.

Q: How do I sample from sheet flow?

A: Refer to pages 9 & 10 of Industrial Stormwater Monitoring and Sampling Guide

FAQ (cont.)

Q: What happens if the exposure status of my site changes?

A: If a site goes from coverage under the permit to a “no exposure” status, the coverage needs to be terminated and NEC application submitted. For the opposite case, the NEC needs to be terminated and an NOI submitted.

Q: Are there allowances for unstaffed or inactive sites?

A: Yes, the routine inspections, the visual assessment, and the benchmark sampling all have allowances.

Certification of no exposure of materials or activities is required for the time period.

FAQ (cont.)

Q: I see my SIC code(s) in Appendix D correspond to a Subsector that does not show up under the benchmarks and/or effluent limits in the Sector. Am I missing something?

A: No. To demonstrate compliance, there are no numeric limits for that particular Subsector.

Q: In Sectors P through S, it seems only maintenance areas are covered. Is that correct?

A: Yes

FAQ (cont.)

Q: What types of landfills are covered by Sector L?

A: C&D (Class II) and MSW (Class III); Class I are not

Q: What limits apply?

A: The benchmark (TSS – 100 mg/L) is applicable to both Class II and III. The nine effluent limits are applicable only to Class III.

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