

Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity (MSGP)

Guam Stormwater Workshop
July 27, 2011

Session Objectives

- Review Applicability and Eligibility
- Requirements
 - SWPPP
 - Inspections
 - Monitoring Requirements
- Reporting and Recordkeeping Requirements



What is the MSGP?

- The MSGP requires industrial facilities to implement and maintain **site-specific** stormwater control measures and to develop stormwater pollution prevention plans (SWPPP).
- The MSGP regulates the discharge of stormwater from an estimated 4100 industrial facilities in **29 different industrial sectors**.

Sector A – Timber Products	Sector P – Land Transportation
Sector B – Paper and Allied Products Manufacturing	Sector Q – Water Transportation
Sector C – Chemical and Allied Products Manufacturing	Sector R – Ship and Boat Building or Repairing Yards
Sector D – Asphalt Paving and Roofing Materials Manufactures and Lubricant Manufacturers	Sector S – Air Transportation Facilities
Sector E – Glass, Clay, Cement, Concrete, and Gypsum Product Manufacturing	Sector T – Treatment Works
Sector F – Primary Metals	Sector U – Food and Kindred Products
Sector G – Metal Mining (Ore Mining and Dressing)	Sector V – Textile Mills, Apparel, and other Fabric Products Manufacturing
Sector H – Coal Mines and Coal Mining-Related Facilities	Sector W – Furniture and Fixtures
Sector I – Oil and Gas Extraction and Refining	Sector X – Printing and Publishing
Sector J – Mineral Mining and Dressing	Sector Y – Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries
Sector K – Hazardous Waste Treatment Storage or Disposal	Sector Z – Leather Tanning and Finishing
Sector L – Landfills and Land Application Sites	Sector AA – Fabricated Metal Products
Sector M – Automobile Salvage Yards	Sector AB – Transportation Equipment, Industrial or Commercial Machinery
Sector N – Scrap Recycling Facilities	Sector AC – Electronic, Electrical, Photographic and Optical Goods
Sector O – Steam Electric Generating Facilities	Sector AD – Reserved for Facilities Not Covered Under Other Sectors and Designated by the Director

MSGP Eligibility

- **To be eligible to discharge under this permit, you must**
 - 1) Have a stormwater discharge associated with industrial activity from your primary industrial activity, provided your primary industrial activity is listed in previous slide (Permit Appendix D), or
 - 2) Be notified by EPA that you are eligible for coverage under Sector AD of this permit.
- **Authorized non-stormwater discharges including:**
 - Discharges from fire-fighting activities
 - Fire hydrant flushing's
 - Potable water, including water line flushing's
 - Uncontaminated condensate from air conditioners, coolers, and other compressors and from the outside storage of refrigerated gases or liquids
 - Foundation or footing drains where flows are not contaminated with process materials

Discharges Not Eligible for Coverage

- Storm water discharges co-mingled with non-storm water discharges, except those specifically authorized (i.e., discharges listed in previous slide)
- Storm water discharges associated with construction activity (CGP)
- Discharges Currently or Previously Covered by Another Permit
 - Stormwater discharges associated with industrial activity that are currently covered under an individual NPDES permit or an alternative NPDES general permit;
 - Discharges covered within five years prior to the effective date of this permit by an individual permit or alternative general permit where that permit established site-specific numeric water quality-based limitations developed for the stormwater component of the discharge; or
 - Discharges from facilities where any NPDES permit has been or is in the process of being denied, terminated, or revoked by EPA (this does not apply to the routine reissuance of permits every five years).

Other Limitations on Coverage

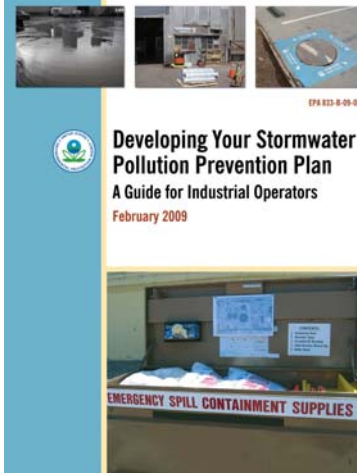
- Discharges to waterbodies with an effective Total Maximum Daily Load (TMDL)
- Discharges to a Clean Water Act Section 303(d) listed waterbody without a TMDL
- Endangered Species Act
- Historic Properties Preservation



MSGP Requirements

SWPPP

- SWPPP team and training records for team members
- Assessment of potential pollutant sources
- Summary of potential pollutant sources
- Site description including identification of all outfalls
- Description of selected control measures including design specifications
- Development of [procedures for conducting required inspection/monitoring activities](#), as well as regular [maintenance of control measures](#), reporting and recordkeeping
- Documentation to support eligibility considerations under other federal laws (e.g., Endangered Species Act)
- Signature requirements



Inspection Requirements

Routine facility inspections must include:

- The inspection date and time;
- The name(s) and signature(s) of the inspector(s);
- Weather information and a description of any discharges occurring at the time of the inspection;
- Any previously unidentified discharges of pollutants from the site;
- Any control measures needing maintenance or repairs;
- Any failed control measures that need replacement;
- Any incidents of noncompliance observed; and
- Any additional control measures needed to comply with the permit requirements.



Inspector Name:	Date:
Signature:	Inspection #:
Weather:	

YES NO N/A
 1. Routine inspection Date of last inspection: _____
 2. Inspection following rain event Date/time of storm ending: _____
 Rainfall amount: _____
 Recorded by: _____

3. Is this a final site inspection?
 4. Has site undergone final stabilization?
 If so, have all temporary erosion and sediment controls been removed?

REPORT CHECKLIST
 Complete the following report checklist and key issue items to attached site plan.

Site Disturbance (Indicate Locations on Plan)
YES NO N/A
 1. Areas previously disturbed, but have not undergone active site work in the last 14 days?
 2. Areas disturbed within last 14 days?
 3. Areas expected to be disturbed in next 14 days?
 4. Do areas of deep slopes or complex stabilization issues exist?
 If "YES" explain: _____
 5. Are there currently more than 5 acres of disturbed soil at the site? If so make sure there is an approval letter from NVIS LDC.

Additional Comments: _____

Inspection of Control Devices
YES NO N/A
 1. Perimeter controls (silt fences) installed? Type: _____
 2. Silt accumulation? Amount (%): _____
 3. Inlet protection? Type: _____
 4. Silt accumulation? Amount (%): _____
 Additional Comments: _____

Stabilization
YES NO N/A
 1. Are all existing disturbed areas contained by control devices? Type of devices: _____
 2. Are there areas that require stabilization within the next 14 days? Specify Area: _____
 3. Have stabilization measures been initiated in inactive areas?
 4. Is there current snow cover or frozen ground conditions?
 5. Silt or gulches?
 6. Slumping/deposition?
 7. Loss of vegetation?
 8. Lack of germination?
 9. Loss of mulch?

Inspection Requirements Continued



- Quarterly visual inspection of stormwater discharge
 - Once each quarter for the entire permit term, you must collect a stormwater sample from each outfall and conduct a visual assessment of each of these samples.
 - You must document the results of your visual assessments and maintain this documentation onsite with your SWPPP.
- Annual Comprehensive Site Inspection
 - Must cover all areas of the facility affected by the requirements in this permit, including the areas identified in the SWPPP as potential pollutant sources where industrial materials or activities are exposed to stormwater, any areas where control measures are used, and areas where spills and leaks have occurred in the past 3 years.
 - The inspections must also include a review of monitoring data collected. Inspectors must consider the results of the past year's visual and analytical monitoring when planning and conducting inspections.
- Document inspection findings and corrective actions
 - Date, personnel conducting inspection, observations, findings, changes to SWPPP as a result of inspection, incidents of non-compliance, signature and certification.

Monitoring Requirements

- The permit requires certain permittees to sample and analyze their stormwater discharges as a way to assess the effectiveness of control measures in meeting the effluent limitations.
- This permit contains five general types of monitoring requirements:
 - 1) Benchmark monitoring
 - You must monitor for any benchmark parameters specified for the industrial sector(s), both primary industrial activity and any co-located industrial activities, applicable to your discharge.
 - 2) Effluent limitations monitoring
 - Table 6-1 of the permit identifies the stormwater discharges subject to effluent limitation guidelines (e.g., Runoff from asphalt emulsion facilities, runoff from material storage piles at cement manufacturing facilities). You must monitor once per year at each outfall containing the discharges identified in Table 6-1 for the parameters specified in the sector-specific section.
 - 3) State or Tribal provisions monitoring
 - You must comply with any State or Tribal monitoring requirements (see Part 9) applicable to your facility's location.
 - 4) Discharges to impaired waters monitoring
 - If you discharge to an impaired water, you must monitor for all pollutants for which the water body is impaired and for which a standard analytical method exists
 - 5) Additional monitoring required by EPA
 - EPA may notify you of additional discharge monitoring requirements. Any such notice will briefly state the reasons for the monitoring, locations, and parameters to be monitored, frequency and period of monitoring, sample types, and reporting requirements.
- The frequency of monitoring is dependent on the applicability of these five types of monitoring to each permitted facility. If any of these monitoring requirements overlap, permittees are authorized to use a single sample to comply with those overlapping requirements.

Monitoring Requirements Continued

Benchmark Sampling Requirements

- Benchmarks Parameters (e.g., pH, specific conductance, total organic carbon, TSS, metals, Oil and grease)
 - If the average of 4 quarterly sample results is greater than the benchmark value, you must:
 - Review the selection, design, installation, and implementation of your control measures
 - Make the necessary modifications and continue quarterly monitoring until you have completed 4 additional quarters of monitoring for which the average does not exceed the benchmark
- Industrial categories with numeric effluent limitation requirements:
 - Runoff from hazardous waste landfills
 - Runoff from non-hazardous waste landfills
 - Runoff from coal storage piles at steam electric generating stations
 - Runoff from crushed stone, sand and gravel operations
 - Runoff from cement manufacturing facilities
 - Runoff from asphalt emulsion facilities



Monitoring Requirements Continued

Overview of Storm Water Effluent and Impaired Waters Monitoring Requirements

- Minimum, once per year
- Grab sample from each outfall during a measureable storm event that results in a discharge from your site, and that follows the previous storm event by at least 72 hours
- Sample for applicable numeric effluent limits and impaired constituents in CWA section 303(d) listed receiving waters
- EPA may require additional monitoring (e.g., TMDLs)



Reporting and Recordkeeping Requirements

- All storm water monitoring data **no later than 30 days** (email date or postmark date) after you have received your complete laboratory results for all monitored outfalls for the reporting period.
 - Report using EPA's online eNOI system (www.epa.gov/npdes/eNOI)
- Exceedance Report
 - Submit within 30 days as stated above with the following:
 - NPDES permit tracking number;
 - Facility name, physical address and location;
 - Name of receiving water;
 - Monitoring data from this and the preceding monitoring event(s);
 - An explanation of the situation; what you have done and intend to do (should your corrective actions not yet be complete) to correct the violation; and
 - An appropriate contact name and phone number.
- Annual Report
 - You must submit an annual report to EPA that includes the findings from your comprehensive site inspection and any corrective action documentation, including the following information with your annual report:
 - Facility name, NPDES permit tracking number, Facility physical address, Contact person name, title, and phone number.
 - You must submit the annual report to EPA within 45 days (postmark date) after conducting the comprehensive site inspection.

Summary Points

- Be familiar with all industrial activities at your site that may be associate with a stormwater discharge
- SWPPPs are meant to be living documents
 - Must be site specific
 - Must be prepared prior to submittal of Notice of Intent (NOI)
 - Must be Routinely updated to reflect site conditions or modifications to site activities
- Perform and document routine site inspections
- Report all monitoring data on time

Resources

- EPA MSGP website
<http://cfpub.epa.gov/npdes/stormwater/msgp.cfm>
- EPA Guidance on MSGP SWPPP Development
http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf
- How to Submit Your NOI and Monitoring Data
www.epa.gov/npdes/eNOI

