

# Draft Industrial Stormwater General Permit

## Public Workshop

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# Workshop Overview

- Summary of Permit Conditions
- Proposed Changes
- Questions

# S1. Permit Coverage

- Table 1 lists industrial activities and SIC codes
  - Consistent with previous permit & EPA
  - Added Hazardous Waste Treatment Storage and Disposal (TSD) Facilities
  
- If stormwater discharges to surface waters or storm drain connected to surface waters
  
- Other types of facilities, if:
  - Significant Contributors of Pollutants; or
  - Reasonably expected to cause violation of WQ Stds; or
  - Stormwater characteristics similar to industries listed in in Table 1.

# S1. Permit Coverage

## Conditional No Exposure Exemption

- No Exposure to Stormwater of Materials or Activities or Previous Site Contamination
  - Based on checklist (11 Questions)
  - Internet-based application
- Must re-apply every 5 years, or by 10/1/13

# S2. Application

- Existing permittees automatically covered under new permit
  
- Unpermitted facilities
  - In operation prior to Jan 1, 2010:
    - Submit Application for Coverage to Ecology
  - In operation after Jan 1, 2010:
    - Submit Application for Coverage to Ecology
    - SEPA and Public Notice Required

# S2. Application

## Modification of Permit Coverage

- Facilities with significant process change
  - Submit application 60 days prior to change
  - SEPA and Public Notice Required
  
- Facilities requesting time extension or waiver from Level 2 or 3 Corrective Actions (BMPs)
  - Submit application 90 days prior to corrective action deadline
  - Public Notice Required

# S3. Stormwater Pollution Prevention Plan (SWPPP)

- All sites must develop and implement SWPPP
  - Site Map
  - Detailed Assessment of Facility
  - Best Management Practices (BMPs)
  - Spill Prevention and Emergency Cleanup Plan
  - Sampling Plan

# S3. Stormwater Pollution Prevention Plan (SWPPP)

- Best Management Practices (BMPs)
  - Operational Source Control BMPs
  - Structural Source Control BMPs
  - Treatment BMPs
- By July 1, 2010, specific BMPs must be incorporated into SWPPP unless exception justified in SWPPP.
  - Includes “applicable” BMPs from Manuals

# S3. Stormwater Pollution Prevention Plan (SWPPP)

- Operational Source Control BMPs
  - Schedules of activities,
  - Prohibition of practices,
  - Maintenance procedures,
  - Employee training,
  - Good housekeeping, and
  - Other managerial practices to prevent pollution
- “Applicable” BMPs from Manuals

# S3. Stormwater Pollution Prevention Plan (SWPPP)

- Structural Source Control BMPs
  - “Applicable” BMPs from Manuals
  - Minimize exposure by locating industrial activities indoors or using storm resistant shelters



# S3. Stormwater Pollution Prevention Plan (SWPPP)

## ➤ Treatment BMPs

- BMPs that are intended to remove pollutants from stormwater
- Include detention ponds, oil/water separators, bioinfiltration, sand filtrations, etc.

# S3. Stormwater Pollution Prevention Plan (SWPPP)

- Clarified that SWPPP needs to be signed and certified by Permittee

# S4. Sampling

## ➤ Timing and Frequency

- Removed strict criteria for sample timing
- Once per quarter
- Representative samples
- At least 24 hrs between sampling
- Not required:
  - outside normal business hours
  - during unsafe conditions, or
  - During quarters when there is no discharge
  - Consistent Attainment (8 samples)

# S4. Sampling

## ➤ Locations

- Representative locations where stormwater from industrial activity is discharged off-site
- Not necessary for discharge to ground
- Each point of discharge off-site, except:
  - where pollutant types do not vary, may sample only the point with the highest concentration
  - (Unless subject to numeric effluent limits)
- Sample after stormwater passes through BMPs

# S5. Benchmarks & Effluent Limits

Apply to All Facilities

Core Parameters	Benchmark
Turbidity	25 NTU
pH	6 – 9 SU
Oil Sheen	No Visible Oil Sheen
Total Zinc	Western WA: 200 µg/L Eastern WA: 255 µg/L

## S5. Comparison of Current and Draft Benchmarks

Parameter	Current Benchmark	Current Action Level	Draft Benchmark
Turbidity (NTU)	25	50	25
pH (SU)	6-9	5-10	6-9
Zinc ( $\mu\text{g/L}$ )	117	372	W WA: 200 $\mu\text{g/L}$ E WA: 255 $\mu\text{g/L}$
O&G / TPH (mg/L)	15	15	No Visible Sheen

## S5. Comparison of Current and Draft Benchmarks

Parameter	Current Benchmark	Current Action Level	Draft Benchmark
Lead ( $\mu\text{g/L}$ )	81.6	159 *	81.6 * **
Copper ( $\mu\text{g/L}$ )	63.6	149 *	West:14 * East: 32 *

\* Current: Copper/Lead/Hardness triggered if zinc action level was exceeded 2 consecutive quarters

\* Draft: Copper/Lead applies to certain sectors: Primary Metals, Metals Mining, Auto Salvage and Scrap Recycling, Metals Fabricating

\*\* Draft: Lead also applies to Haz Waste TSDs

# S5. Additional Benchmarks

- Other industry-specific benchmarks:
  1. Chemical and Allied Products; Food and Kindred Products
  2. Primary Metals; Metals Mining; Automobile Salvage & Scrap Recycling; Metals Fabricating
    - New: Added Total Petroleum Hydrocarbons
  3. Hazardous Waste TSDs
    - New: Added category and benchmarks
  4. Air Transportation
    - Clarified: 100,000 gal glycol based deicer and/or 100 tons of urea used on average annual basis
  5. Timber Products; Paper and Allied Products
    - New: Added COD 120 mg/L, and TSS 30 mg/L

# S5. Effluent Limitations

- Effluent Limitations for Non-Hazardous Waste Landfills
  - same as before
  
- Deleted effluent limitations for:
  - Coal Piles
  - Hazardous Waste Landfills

# S5. Effluent Limitations

## ➤ Prohibited Discharges

- Process wastewater
- Illicit Discharges

## ➤ General Prohibitions

- Manage Stormwater to prevent discharge of:
  - Synthetic, natural or processed oil or oil-containing products as identified by an oil sheen, and
  - Trash and floating debris

# S6. Discharges to 303(d)-Listed Waters

## ➤ New Dischargers:

- Not eligible for permit coverage unless:
  - Applicant prevents exposure of pollutant causing 303(d) listing
  - Applicant documents that the pollutant for which waterbody impaired is not present
  - Applicant provides data to show that WQ standards will be met

## S6. Discharges to 303(d)-Listed Waters

- Existing Dischargers & Eligible “New Dischargers”:
  - Numeric effluent limitations
    - RCW 90.48.555(7)(a)
- Compliance required by July 1, 2010 unless compliance schedule granted:
  - No later than 2 years, or
  - 2 complete “wet seasons” (Oct 1 – June 30)

# S6. Discharges to 303(d)-Listed Waters

Parameter	Units	Effluent Limitation	
		Fresh Water	Marine
Turbidity	NTUs	25	25
pH	S U	6.5 - 8.5	6.0 - 9.0
Fecal Coliform*	# colonies/ 100 mL	100	43
Sediment (TSS)	mg/L	30	30
Phosphorus, Ammonia, Copper, Lead, Mercury, Zinc	TBD	Site-Specific	Site-Specific

\* Only certain sectors: SIC 20XX; 4952; 4953; 2873

## S6. Discharges to Waters with TMDLs

- Comply with TMDL wasteload allocation and sampling, if applicable (*Appendix 5*)
- If TMDL doesn't have specific requirements; *permit compliance = TMDL*
- If TMDL specifically prohibits discharge, not eligible for permit coverage

# S7. Inspections

## ➤ Inspections

- 1/month
- Combined 3 types of inspections into one

## ➤ Purpose:

- Identify stormwater contamination
  - Spills
  - Illicit discharges
- BMPs – maintenance, etc.
- Ensure SWPPP accurately reflects site

# S7. Inspections

- Inspection report/checklist
  - Kept with SWPPP
  - Signed/Certified by inspector and authorized representative
  
- Inspector training and certification
  - Certified Industrial Stormwater Manager
  - By Oct 1, 2012
    - Small business has until Oct 1, 2013

# S8. Corrective Actions

- RCW 90.48.555 (8)(a) requires an *adaptive management mechanism*:
  - An adaptive management indicator, such as monitoring benchmarks;
  - Monitoring;
  - Review and revisions to the SWPPP;
  - Documentation; and
  - Reporting to the department

# S8. Corrective Actions

- Samples over benchmark values trigger incremental upgrades to BMPs and SWPPP
- Level 1 – Operational Source Control BMPs
- Level 2 – Structural Source Control BMPs
- Level 3 – Treatment BMPs
- Level 4 (New): Requires Ecology to take actions

# S8. Corrective Actions

- Transition from current permit to new
  - Facilities that reached Level 2 or 3 under current permit, enter new permit at Level 2.
    - List in Appendix 6
  - Facilities not listed in Appendix 6: data from current permit doesn't count (fresh start)

# S8. Corrective Actions

## ➤ Level 1 - Operational Source Control

**Trigger: 1 benchmark exceeded after 1/1/2010**

- Review SWPPP; ensure that correct BMPs are in place
- Make appropriate SWPPP revisions to include additional Operational Source Control BMPs
- Level 1 SWPPP Certification (Appendix 3)
  - Attach to SWPPP; only submit if requested
  - Deadline: Table 6 (p. 38)

# S8. Corrective Actions

## ➤ Level 2 - Structural Source Control

Trigger: Listed in Appendix 6; or if any benchmark exceeded during any 4 quarters after 1/1/2010

- Review SWPPP; ensure that correct BMPs are in place; SWPPP revisions to include additional Structural Source Control BMPs
- Level 2 SWPPP Certification (Appendix 3)
  - Attach to SWPPP; only submit if requested
  - Deadline: Table 6 (p. 38)
- Waivers/Time Extensions

# S8. Corrective Actions

## ➤ Level 3 – Treatment BMPs

Trigger:

Listed in Appendix 6 + any benchmark exceeded during any 4 quarters (after 1/1/2010); or

If any benchmark exceeded during any 8 quarters (after 1/1/2010)

- Review SWPPP; ensure that correct BMPs are in place; SWPPP revisions to include additional Treatment BMPs

# S8. Corrective Actions

## ➤ Level 3 – Treatment BMPs

- Implement treatment BMPs – remove pollutants from stormwater (oil/water, ponds, filters, etc.)
- Level 3 SWPPP Certification (Appendix 3)
  - Professional Engineer designs and stamps portion of SWPPP that deals with treatment
  - Attach to SWPPP; Submit SWPPP to Ecology
  - Deadline: Table 6 (p. 38)
- Waivers/Time Extensions

# S8. Corrective Actions

## ➤ Level 4 Corrective Action

### Trigger:

Listed in Appendix 6 + benchmarks exceeded during any 8 quarters (after 1/1/2010); or

If any benchmark exceeded during any 12 quarters (after 1/1/2010)

- Permittee submits *Level 4 Notification Form* within 45 days of DMR deadline

# S8. Corrective Actions

- Level 4 - Requires Ecology Action:
  - Issue administrative order
    - Receiving water study
    - Engineering report
    - Additional monitoring
    - Additional BMPs or Treatment
  - Modify permit coverage, if additional measures aren't necessary
  - Require individual permit
  - Revoke/Terminate permit coverage

# S9. Reporting and Recordkeeping

- Discharge Monitoring Reports (4/year)
  - 45 days after end of each quarter
  - Even if no sample collected
- e-DMR required beginning August 14, 2010
- Maintain records on-site
  - Make available to Ecology or local jurisdiction
  - Public access to records

# S10. Compliance with Standards

- Discharges shall not contribute to violation of:
  - Water Quality Standards
  - Ground Water Standards
  - Sediment Management Standards
  - Human health-based criteria in National Toxics Rule

S11. Permit Fees

S12. Solid and Liquid Waste

S13. Notice of Termination

General Conditions

# Draft Permit - Next Steps

- Public Hearing
  - July 13<sup>th</sup> Pierce Co Library, Tacoma
- Public Comment Period closes July 15<sup>th</sup>
- Ecology considers comments
  - Prepares response to comments document
  - Makes appropriate revisions
- Issue Final Permit Oct 21, 2009
- Effective Date January 1, 2010

# Questions?

