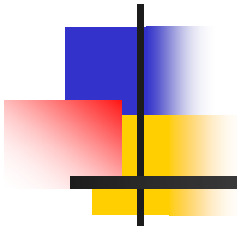


Surviving the draft 2012 Industrial General Stormwater Discharge Permit: *An Overview*



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2012 Industrial General Stormwater Discharge Permit

- **Risk-Based: NAL Exceedance Frequency**
 - Baseline
 - Level 1
 - Level 2
 - Performance Standard for Treatment BMPs
 - Demonstration Reports: BAT/BCT; Non- Industrial; Background
 - Exceedance Response Action (ERA) Report
- **Online Reporting via SMARTs: “Real-time”**
 - PRDs
 - NOI
 - SWPPP
 - Results & Reports
- **Mandatory Minimum BMPs**
- **Increased Monitoring & Reporting**
 - Year-round quarterly sampling of all “drainage areas”
 - Online reporting of analytical results w/in 30 days
 - Pre-storm BMP inspections (14 days)
 - ACSCE
 - Annual Report
- **QISPs**
- **Compliance Groups**
- **“Strict Compliance”**



2012 Industrial General Stormwater Discharge Permit

- **BAT/ BCT *and* WQS Compliance Demonstration: No Clear Path**

- **BAT/ BCT:**

- Technology-based
- Sector Specific
- Point of Compliance: At the point of Discharge
- EPA MSP Benchmarks

- **Water Quality Standard (WQS):**

- Water Quality Criteria : CTR
- Point of Compliance: Discharge to the Receiving Water
 - July 2011 Federal 9th District Appeals Court Ruling: "*Discharge to MS4 that exceeds WQBNELs is not a violation of the Clean Water Act*"

- **Effluent Limitation Guidelines (ELGs)/New Source Performance Standards (NSPS)**

- *New source performance standards (NSPS) represent the best available demonstrated control technology standards. The intent of NSPS guidelines is to set limitations that represent state-of-the-art treatment technology for new sources*

- **Part 455: Land fills**

- Zinc: ELGs = .535 mg/l; NSPS=.20 mg/l
- TSS: 88 mg/l (ELGs/NSPS) vs. 100 mg/l (NALs)



2012 Industrial General Stormwater Discharge Permit

- Compliance Groups (i.e. Monitoring Groups)
 - Baseline/Level 1
 - Level 2: Staff's "Goal": 1 per sector
- *Sector Discharger Establish BAT/BCT*
 - BMP Performance across varying site/operational conditions
 - Relies/applies sector specific expertise
 - Defendable



Water Quality Compliance Strategies For Municipalities & Landfills

- Sector Specific IGP for Landfills, MS4s
- Construction General Permit more appropriate for Landfill operations?
- Facility- Specific Water Quality Permitting: Consolidate WDRs/NPDES into single, comprehensive permit
- Regional/Watershed Approach: Consolidates MS4 stormwater/waste water permitting obligations