

2015 Industrial Stormwater Permit – What do you need to know?

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The Questions to Ask Now

- Does your facility need Industrial Stormwater permit (Permit) coverage?
- How do I get Permit coverage?
 - The application process
 - No exposure certification
- What has changed between 2010 Permit and the 2015 Permit?
 - Stormwater Pollution Prevention Plan (SWPPP) updates
- What are FAQs and other items to know regarding the 2015 permit?

Does Your Facility Need Permit Coverage?

- Narrative Activities
- SIC codes
- Applicable narrative activities and SIC codes determine your applicable Industrial Activity Sectors
- If you fall under one of these categories you need a permit OR to apply for “No Exposure”

<http://www.pca.state.mn.us/index.php/view-document.html?gid=21329>

Narrative Activities

Subsector	Subsector description
A4	Timber products: discharges from wet decking storage areas
C1	Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, by-products, or waste products
D2	Discharges from production of asphalt emulsions areas
E3	Cement manufacturing facility, material storage runoff (note: this is not a concrete ready mix facility)
K1	Hazardous waste treatment/storage/disposal facility for discharges not subject to effluent limitations in 40 CFR pt. 445, subp. A (note: this is not a hazardous waste generator)
K2	Hazardous waste treatment/storage/disposal facility for discharges subject to effluent limitations in 40 CFR pt. 445, subp. A (note: this is not a hazardous waste generator)
L1	Municipal solid waste landfill areas closed in accordance with 40 CFR 258.60
L2	Open or closed non-hazardous waste landfill and land application site not discharging to surface water
L3	Landfill that discharges to surface waters stormwater that has directly contacted solid waste
O1	Coal fired and oil fired steam electric generating facility
O2	Nuclear, natural gas fired, and any other fuel source used for steam electric generation
O3	Runoff from coal storage piles at steam electric generating facility
S3	Existing and new primary airports with 1,000 or more annual jet departures that discharge wastewater associated with airfield pavement deicing that contains urea commingled with stormwater
T1	Treatment works with design flow of one million gallons per day or more or are required to have an approved pretreatment program under 40 CFR pt. 403

Permit Applications

- Online or Paper
- Applications were due October 5th
 - \$400 Fee
 - Changes
 - S3 – New Narrative Activity
 - Additional specification for Q9 (No Exposure)
 - All street drains or manholes are MS4
- What do I do if I need permit coverage but have not applied yet?
 - Apply as soon as possible

No Exposure

- Applying No Exposure has no fee required
- To qualify for the No Exposure exclusion, 100% of your industrial activities and significant materials must be indoors or within a storm-resistant shelter 100% of the time for you to be able to answer “No” to all of the No Exposure qualifying questions
 - The questions refer to your ENTIRE facility
 - Storm-resistant shelters include completely roofed and walled buildings and structures, or structures with a top cover that are bermed, sloped inward, or otherwise prevent stormwater from running into the area or for potential materials or spills, including windblown materials from leaving the area.

Are any of the following materials or activities exposed to precipitation, now or in the foreseeable future?

Materials or Activities	Examples (Not inclusive)	
A. Use, storage or cleaning of industrial machinery or equipment; areas where residuals from these activities and equipment remain exposed to stormwater	Vehicle and equipment washing, maintenance and storage areas, molds or forms used to make products, outdoor manufacturing or processing areas	<input type="checkbox"/> Yes <input type="checkbox"/> No
B. Spills or leaks on the ground or in stormwater inlets	Hydraulic fluid, fuel, oil, other fluid or material leaks or spills	<input type="checkbox"/> Yes <input type="checkbox"/> No
C. Residuals, equipment, or products from past industrial activity	Materials from past industrial activities/owners are still outside and exposed to stormwater	<input type="checkbox"/> Yes <input type="checkbox"/> No
D. Inadequately maintained facility equipment or vehicles	Leaking forklifts, trolleys, delivery vehicles, leaking machinery performing loading/unloading activities	<input type="checkbox"/> Yes <input type="checkbox"/> No
E. Facility vehicle fueling, loading/unloading/transporting materials or products	Raw material delivery/storage, loading/unloading operations; facility vehicle maintenance; loading/unloading of biosolids, fueling activities, other substance transfer areas that include solvents, coolants, lubricants, and cleaners	<input type="checkbox"/> Yes <input type="checkbox"/> No
F. Storage of material or product (except final products intended for outside use such as new cars)	Raw materials, metallic materials, chemicals or intermediate products, rusted or corrodible racks; spent equipment, salvaged vehicles or vehicle parts, final products not meant to be outdoors, any of which are a potential source of contaminants	<input type="checkbox"/> Yes <input type="checkbox"/> No
G. Containers of materials or products which are deteriorated or leaking; containers without proper covers or secondary containment	Open storage tanks, drums, broken or contaminated pallets, totes, or dumpsters, containers, racks and platforms that are not pollutant-free or are rusting/deteriorating	<input type="checkbox"/> Yes <input type="checkbox"/> No
H. Stockpiling or transfer of materials or products onsite or on roads or railways owned or maintained by the facility	Salt, coal, sand, gravel, and other materials, by-products, or waste products including biosolids, hazardous materials/wastes or other waste destined for land application	<input type="checkbox"/> Yes <input type="checkbox"/> No
I. Waste materials in uncovered disposal areas, open dumpsters, or open roll off containers	Scrap metal, oily rags, sawdust, broken pallets, spent equipment, batteries, hazardous wastes	<input type="checkbox"/> Yes <input type="checkbox"/> No
J. Disposal of process wastewater. <i>Must have a National Pollutant Discharge Elimination System (NPDES)/State Disposal System (SDS) permit or authorization from local Wastewater Treatment Facility</i>	Unpermitted process wastewater disposal including land application; permitted wastewater disposal that stains the ground or leaves visual deposits of residuals	<input type="checkbox"/> Yes <input type="checkbox"/> No
K. Visible deposits of particulate matter or residuals from roof stacks and/or vents or other sources and evident in the stormwater runoff	Baghouse dust or smokestack residue, road dust from industrial vehicle traffic, wood debris and dust, dust and debris from grinding, cutting, buffing, or brazing metal or plastic parts	<input type="checkbox"/> Yes <input type="checkbox"/> No



C - Residuals, equipment or products from past industrial activity



G - Containers of materials or products which are deteriorated or leaking; containers without proper covers or secondary containment
I - Waste material in uncovered disposal areas, open dumpsters or open roll off containers



K - Visible deposits of particulate matter or residuals from roof stacks and/or vents or other sources and evident in the stormwater runoff

2010 vs 2015 Industrial Stormwater Permit

- Sampling frequency
- Sampling exceedances
- Materials tracking
- Chemical additives

Old vs. New – Sampling Frequency

2010 Permit

- Sampling calendar
 - Every other year Starting in Year 2
- “sample out” 1 and done

2015 Permit

- New calendar
 - July 1 2015 Start for all
- Passing average of 4 is the way to “sample out”
- Rolling 4

Old vs. New – Sampling Exceedances

2010 Permit

- Sampling exceedance
 - Exceedance leads to 1 year to fix
 - Sampling in alternate years

2015 Permit

- Sampling Exceedances
 - 14 but no longer than 45 days for documentation and progress for BMP improvements

Old vs. New – Material Tracking

2010 Permit

- Tracking and Sweeping
 - 7 days
 - Some Sectors were required to sweep weekly

2015 Permit

- Tracking
 - Must be addressed within 72 hours of discovery

Old vs. New – Chemical Additives

2010 Permit

- Part III Section E – Chemical Additive Use, was added in its entirety as seen in 2015 version)

2015 Permit

- Chemical Additive Use - Polymers, flocculants, or other sedimentation treatment chemicals
 - Chemicals may only be applied where treated stormwater is directed to a sediment control system
 - Chemicals must be selected that are appropriately suited to the types of soils likely to be exposed stormwater
 - Chemicals must be used in accordance with accepted good engineering practices, and as directed by the provider/supplier of the chemicals
- The SWPPP must contain an inventory of all chemical additives. The records should include:
 - The process for which the additive will be used;
 - The proposed method/frequency/concentration of application;
 - A complete product use and instruction label; and
 - Material Safety Data Sheet (MSDS).

Frequently asked Questions

- When does my SWPPP need to be updated?
Before you apply for the new permit. Part I C. 2.
“ The applicant(s) must develop a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of Part IV prior to submitting an application to the Commissioner.”
- I will not have coverage for 5 years under my previous permit. Do I still need to apply now?
Yes, all permittees need to apply before October 5th.
- I’m going to open a new facility in the next 6 months, which permit do I need to apply for and comply with?
The 2015 Permit. The MPCA indicated that the application for the 2015 permit can be made effective immediately.”

Frequently asked Questions

- If I qualified for No Exposure under the previous permit and upon review of the new permit application do not qualify for No Exposure. When do I need to have a SWPPP in place? ^{A1}

Prior to Completion of the 2015 permit application.

- What updates does my SWPPP need?
A few depending on your sector and changes at your facility.
- If I had no sampling exceedances the last permit cycle do I need to sample during this permit?
YES!!!!

Additional Items to Know

- Effluent Limit vs. Benchmark Monitoring
 - Enforceable vs. Not
 - Recordkeeping
- Benchmark Monitoring Waivers
 - You will need to re-apply for the benchmark monitoring waiver under the new permit
 - Currently 20 facilities are certified and MPCA will be contacting them directly in the coming months regarding the reapplication process

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A1 What does this mean John?
A3AVQZZ, 10/23/2014

MPCA - Training

- Now that I've applied for the 2015 Permit, how can I attend training?
 - The University of Minnesota has three workshops open for registration:
 - December 3, 2014 - MnDOT Training and Conference Center, Arden Hills
 - December 10, 2014 - Soil and Water Conservation District, Farmington
 - January 7, 2015 - Best Western Hotel, North Mankato

<http://www.pca.state.mn.us/index.php/water/water-types-and-programs/stormwater/industrial-stormwater/index.html>

Thank You!

Questions?

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