

# **Industrial Stormwater General Permits Oregon DEQ vs. EPA**

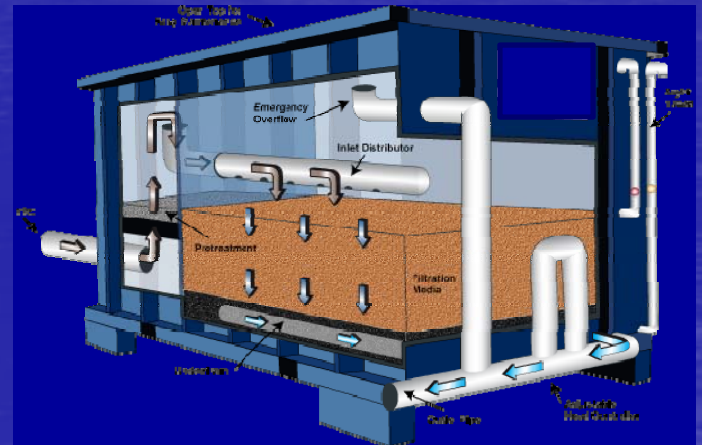
Jenine Camilleri  
DEQ Stormwater Coordinator

# DEQ Permit Universe

- 1200-Z Permit
  - Applies to industries throughout state, based on Standard Industrial Codes
    - Manufacturing Facilities
    - Scrap Yards
    - Metal Plating Industries
    - Vehicle Repair Shops
  - Approx. 755 facilities registered under permit
- 1200-COLS Permit
  - Applies to industries in Columbia Slough Watershed, based on SIC code
  - Approx. 140 facilities registered under permit

# Industrial Sites

- Typical pollutants that runoff Industrial sites
  - Metals, solids (sediment, debris), oil and grease, nutrients, solvents
- BMPs
  - Pollution prevention measures
    - Employee education
    - Spill response
    - Cover
  - Treatment
    - Oil water separator
    - Filtration
    - Electro-coagulation
    - Bioswales



# Technology Based Effluent Limits

- MSGP
  - Reorganized permit and developed narrative technology based limits that facilities
    - Series of control measures that facilities must implement
      - Ex: Good Housekeeping-Keep clean all exposed areas that are potential sources of pollutants, using measures such as sweeping and storing materials
- DEQ permits
  - Series of controls measures that facilities must implement *if appropriate for the site* and include them in stormwater plan

# Narrative WQ Based Effluent Limits Water Quality Standards

- MSGP
  - Control discharge as necessary to meet WQ standards
  - If discover discharge causing or contributing to WQ standards violation, take corrective action
- DEQ permits
  - Discharge may not cause an instream WQ standards violation
  - Presume discharge meets standards if implementing control measures (consistent with MSGP)
  - Required to take corrective action if discharge does not meet standards

# Narrative WQ Based Effluent Limits Discharges to Impaired Waterbodies

- MSGP
  - Discharge Pollutant of Concern & TMDL
    - New Discharge-EPA determines if remaining WLA in TMDL to allow discharge
    - Existing Discharge-EPA determines if TMDL applies to industrial discharger/sector and whether additional requirements are necessary to meet WLA
  - Discharge Pollutant of Concern & No TMDL
    - New Discharge-Allowed if does not cause or contribute to water quality standards violation
    - Existing Discharge-Control discharge as necessary to meet WQ standards & sample pollutants of concern annually

# Narrative WQ Based Effluent Limits Discharges to Impaired Waterbodies

- DEQ permits
  - No specific requirements, except that:
    - 1200-Z permit-if permitted source assigned WLA in TMDL, individual permit may be necessary
    - Must not cause a water quality standards violation
  - Case by case evaluation of new discharges to impaired waters without a TMDL who are applying for coverage under the permits

# Monitoring Requirements

	DEQ	MSGP
Type of Sample	No requirements	<ul style="list-style-type: none"> <li>● Within 30 minutes to account for first flush. If infeasible, document in SWPCP reason why</li> <li>● Collect during measurable storm event that follows a storm by at least 3 days.</li> </ul>
Sampling Frequency	4 times per year	4 times per year-quarterly samples
Parameters sampled	7 analytical parameters	25 analytical parameters (sector specific)
	2 visual monitoring parameters	9 visual monitoring parameters
	Conduct visual inspections monthly when discharging	Conduct visual inspections quarterly

# Benchmark Comparison

## Summary

	<b>1200-Z</b>	<b>1200-COLS</b>	<b>MSGP</b>
TSS	130 mg/l	50 mg/l	100 mg/l
Copper	0.1 mg/l	0.036 mg/l	Hardness Dependent of the receiving stream (HD) (range 0.0038 to 0.0332 mg/L)
Lead	0.4 mg/l	0.06 mg/l	HD (range 0.014 to 0.262 mg/L)
Zinc	0.6 mg/l	0.24 mg/l	HD (range 0.04 to 0.026 mg/L)
pH	5.5 – 9.0 su	5.5 – 9.0 su	6.0 – 9.0 su
Oil and Grease	10 mg/l	10 mg/l	15 mg/l
Turbidity	N/A	N/A	50 NTU (Sector G only-Mining)

# Monitoring & Reporting Requirements

	DEQ	MSGP
Sampling Waiver	Allowed after 4 events if all events meet benchmarks	Allowed after 4 events if average does not exceed benchmark
Response to Benchmark Exceedance	Submit Action Plan each time benchmark exceeded	Review BMPs, update if necessary, if average of 4 samples exceeds benchmark. Submit corrective action report annually.
Impaired Waterbodies without TMDL	No requirements	<ul style="list-style-type: none"> <li>● Monitor pollutants of concern if standard analytical method exists</li> <li>● Monitor once per year at each outfall</li> </ul>
Reporting	Submit paper Discharge Monitoring Report (DMR) annually	Report data results within 30 days using EPA's electronic database or paper DMR