

Revising DEQ Industrial Stormwater General Permits Nos. 1200-Z and 1200-COLS

Advisory Committee Work Plan

Timeline-16 months (Est. June 1, 2009 to September 30, 2010)

Work Session	Purpose of Meeting	Discussion Items	Meeting Date	Deliverable
1 Project Overview	Present scope of the project and timeline. Describe how this group will contribute to drafting the new permits and topics that DEQ will be soliticting feedback on. Describe process for upcoming meetings and groundrules.	Explain why DEQ is revising industrial stormater permits. Discuss settlement agreement (if available) and EPA's Multi Sector General Permit (MSGP). Discuss the work plan, role of committee and outcomes. Get feedback from the group on the schedule and topics identified in work plan.	6/23/2009	Provide copies of work plan, settlement agreement (if available), and ground rules for meetings.
2 Summary of EPA Multi-Sector General Permit (MSGP) and Analysis of Policy Issues	Provide an overview of EPA's MSGP and how it is similar/different from Oregon's current industrial stormwater permits.	Describe EPA's rationale for permit requirements related to important policy issues: water quality standards requirements, discharges to impaired waterbodies, numeric and narrative technology based effluent limits, monitoring requirements, benchmarks, and response to benchmark exceedances. Respond to questions stakeholders may have and identify any follow up discussions for future meetings.	First week of August 2009	Summary of the input received from last meeting and any changes to the schedule or topics. Clearly articulate EPA's rationale for permit requirements and how EPA's approach will shape Oregon permits. Identify issues/questions raised related to MSGP permit that will be put in "parking lot" and discussed in future meetings.
3 Stormwater Monitoring-Overview	Provide overview of National Research Council's (NRC) recommendations on stormwater monitoring. Provide overview of EPA's monitoring requirements. Discuss retaining Oregon's current requirement to obtain an Individual Permit based on 4th year geometric mean benchmark evaluation	Discuss goal of stormwater monitoring and challenges due to variability of storm events and site characteristics in light of NRC's recommendations. Revisit the key differences between MSGP and Oregon's current monitoring requirements. Discuss process DEQ will follow to analyze benchmark monitoring data related to 4th year geometric mean evaluation to determine number of sources that may need an individual permit. Discuss appropriateness of retaining requirement to obtain individual permit based on 4th year geometric mean evaluation given the benchmark concentrations may be more stringent in Oregon's new permits.	Sep-09	Summary of the input received at last meeting regarding MSGP requirements and respond to questions or need for additional input/discussions. Summary of NRC recommendations. Summary of process for analyzing stormwater data related to 4th year geometric mean benchmark evaluation. Identify issues/questions raised related to monitoring that will be put in "parking lot" and discussed in future meetings.
4 Stormwater Monitoring-Characterization of Stormwater Discharge	Discuss whether Oregon's new permits should require stormwater characterization data, a shorter time period for monitoring waiver, and additional data to support representative outfall determination.	Discuss whether sources should analyze stormwater discharges for all benchmark parameters in MSGP and pollutants of concern if receiving stream on the 303(d) list to better characterize their stormwater discharge. Discuss purpose of monitoring waiver, including whether sources should sample stormwater throughout permit term. Discuss purpose of representative outfall requirements, including need for outfall characterization and data supporting that outfalls are representative. Discuss MSGP first flush monitoring requirements	Oct-09	Summary of the input received at last meeting and respond to questions raised on monitoring approach or need for additional input/discussions. Provide options for monitoring requirements.

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5	Stormwater Monitoring- Consequences of Benchmark Exceedances	Discuss whether Oregon's new permits should include additional requirements for failing to meet benchmarks.	Discuss options for consequences of benchmark exceedance, including documenting corrective actions, escalating responses based on regularity and intensity of the exceedances, or loss of permit coverage. Discuss criteria for determining when source is not eligible for general permit coverage.	Nov-09	Summary of the input received at last meeting and respond to questions raised on monitoring approach or need for additional input/discussions. Update on DEQ's analysis of benchmark monitoring data. Provide options for consequences for benchmark exceedances and criteria for requiring individual permit.
6	Stormwater Monitoring-Wrap Up	Wrap up the discussion on monitoring requirements. Provide recommended approach to group and obtain feedback on proposal.	Discuss DEQ's recommendations for monitoring requirements related to issues discussed in previous meetings. Discuss any remaining questions/issues regarding monitoring approaches and whether Oregon will propose additional requirements beyond what is required in EPA's MSGP.	Dec-10	Summary of the input received and respond to questions raised regarding proposed options. Finalize recommendations for requirements based on group input.
7	Water Quality Based Effluent Limits- New requirements for Discharges to Impaired Waterbodies	Provide overview of EPA's requirements for discharges to impaired waterbodies. Discuss approach for implementing requirements for new and existing discharges under Oregon's new permits.	Discuss following tools or guidance that DEQ will develop to implement new requirements: (1) identifying discharges to impaired streams; (2) ensuring existing discharges comply with TMDLs, and (3) developing monitoring protocol for evaluating whether new discharges with pollutants of concern are eligible for permit coverage.	Jan-10	Summary of the input received from last meeting and respond to questions raised. Provide group with tools and guidance DEQ is anticipating to develop to implement new requirements. Identify issues/questions raised related to water quality based effluent limits that will be put in "parking lot" and discussed in future meetings.
8	Water Quality Based Effluent Limits- Clarifying compliance with water quality standards	Provide an overview of EPA's rationale for water quality standards requirements in Part 2.2.1 of the MSGP. Discuss whether Oregon's new permits should clarify how facilities "will control their discharge as necessary to meet water quality standards."	Discuss approaches for clarifying how sources will ensure their discharge meets water quality standards, including considering site specific factors such as (1) whether stormwater directly discharges to receiving stream or discharges to a conveyance system and commingles with stormwater runoff from other facilities; (2) characterizing pollutants in a facility's stormwater discharge; (3) if the receiving stream is impaired whether it has assimilative capacity, and (4) the proper location for sample collection.	Feb-10	Summary of the input received and respond to questions raised related to water quality based effluent limits or need for additional input/discussion. Propose approach for clarifying water quality standards language and how facility may show compliance with standards.
9	Water Quality Based Effluent Limits- Wrap up	Wrap up the discussion on water quality based effluent limits. Respond to input from the group on DEQ's proposed approach for implementing these permit requirement.	Walk through the steps for new discharges applying for permit coverage and existing discharges operating under the new permit. Discuss any remaining questions/issues regarding water quality based effluent limits and how Oregon will implement these requirements in the new permits.	Mar-10	Summary of the input received and respond to questions raised related to water quality based effluent limits. Finalize recommendations for implementing permit requirements based on group input.

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10	Implementation Issues related to Issuance of New Permits	Develop process for issuance of new permits considering significant number of facilities will need to update plans and reapply for permit coverage.	Apr-10	Summary of approach for phasing in permit holders under new permit. Summary of options for streamlining plan review.
11	Implementation Issues related to Issuance of New Permits-Wrap Up	Wrap up any remaining issues related to implementation of the new permits.	May-10	Finalize recommendations for streamlined approach for permit implementation.
12	Comments on Draft Permits	Provide advisory committee with opportunity to discuss comments on proposed permits during 35 public notice and comment period.	Jun-10	Outline major changes to the proposed permits.

Completion of Project: 35 day public notice and comment period (June 1 to July 7, 2010). Complete response to comment document, fact sheet and final permits (July to September 2010). Provide EPA with 90 days to review permits before they are finalized (June to August 2010). Project complete September 30, 2010.

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