

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

Advisory Committee Work Plan

Timeline-2 years and 3 months (Est. June 1, 2009 to August 31, 2011)

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.	8/4/2009	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.	9/15/2009	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	10/20/2009	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.

Work Session	Purpose of Meeting	Discussion Items	Meeting Date	Deliverable
5 Stormwater Monitoring- Consequences of Benchmark Exceedances	Discuss whether Oregon's new permits should include additional requirements for failing to meet benchmarks. Discuss goals and objectives of a draft tiered regulatory approach.	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 the the initial analysis of historical stormwater data for metals to see the range of exceedances based on the benchmark values in EPA and DEQ's permits.	11/17/2009	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 consequences for benchmark exceedances.
6 Subcommittee Meeting on Tiered Regulatory Approach for Benchmark Exceedances	Discuss draft tiered regulatory approach for benchmark exceedances and implementation steps.	Discuss with the subcommittee the implementation steps for the draft tiered regulatory approach, including which facilities would be required to implement additional BMPs, conducting a feasibility analysis to determine the appropriate BMPs and timing for completing the corrective actions.	12/15/2009	Summary of the input received and respond to questions raised regarding draft tiered regulatory approach.
7 Discharges to Impaired Waterbodies and Water Quality Based Benchmarks	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 developing water quality based benchmarks for copper, lead and zinc.	Discuss proposal to hire a contractor to assist DEQ with developing water quality based benchmarks for copper, lead and zinc. Discuss considerations for new permit requirements for discharges to impaired waterbodies with TMDLs such as whether stormwater was considered in the source assement of the TMDL and whether there are Waste Load Allocations for industrial stormwater. Discuss considerations for discharges to impaired waterbodies without TMDLs such as whether facilities that discharge impairment pollutants should meet numeric effluent limits in the new permits.	1/19/2010	Summary of the input received from last meeting and respond to questions raised. Provide options/considerations for benchmarks and draft tiered regulator approach. Provide options for requirements for discharges to impaired waterbodies and examples of impaired waterbodies in urban areas with heavy industrial use. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.
8 Discharges to Impaired Waterbodies and Water Quality Based Benchmarks	Discuss draft scope of work for the benchmark project and projected timeline. Discuss recommendations for requirements for discharges to impaired waterbodies with TMDLs and options/considerations for requirements for discharges to impaired waterbodies without TMDLs.	Provide overview of TMDL program and Water Quality Assessment Integrated Report. Discuss recommendation that DEQ will presume compliance with permit will meet TMDLs for majority of facilities discharging to mpaired waterbodies with TMDL, except Columbia Slough TMDL. Discuss whether additional requirements are necessary for facilities discharging to Columbia Slough TMDL. Discuss issues DEQ is considering for facilities discharging to impaired waterbodies without TMDL such as requiring increased monitoring, additional BMPs or numeric effluent limits. Discuss option of issuing watershed permits.	2/16/2010	Summary of the input received from last meeting and respond to questions raised. Provide overview of Water Quality Assessment Integrated Report and Development of TMDLs. Provide recommendations for requirements for discharges to impaired waterbodies with TMDLs. Provide options/considerations for facilities discharging to impaired waterbodies without TMDLs, including list of impaired waterbodies and pollutants of concern. Provide number of facilities that discharge to various watershed/sub basins. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.

Work Session	Purpose of Meeting	Discussion Items	Meeting Date	Deliverable
9 New requirements for Discharges to Impaired Waterbodies and Water Quality Based Benchmarks	Provide update on the benchmark project. Discuss recommendation for requirements for facilities in Columbia Slough Watershed based on TMDL evaluation. Discuss recommendations for discharges to impaired waterbodies without TMDLs.	Provide update on the benchmark project, including projected timeline and preliminary analysis of water quality data and method that will be used to evaluate the dilution rate in the current 1200-Z permit. Discuss recommended approach for facilities in Columbia Slough Watershed based on evaluation of Columbia Slough TMDL. Discuss recommended approach for facilities discharging to impaired waterbodies without TMDLs, including requiring facilities to install the most effective BMP to reduce the impairment pollutants in discharge below the water quality standard/criteria.	4/20/2010	Summary of the input received from last meeting and respond to questions raised. Provide recommendations for requirements for facilities in Columbia Slough Watershed and discharges to impaired waterbodies without TMDLs. Provide chart of number of facilities discharging to impaired waterbody segments without TMDLs and 303(d) listed pollutants for those segments. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.
10 Water Quality Based Benchmarks and Wrap up any remaining issues regarding Discharges to Impaired Waterbodies.	Provide update on the benchmark project regarding whether DEQ can characterize surface water quality at a smaller scale such as a watershed scale and whether current dilution rate is appropriate. Address any remaining issues regarding Discharges to Impaired Waterbodies.	Discuss whether there is sufficient data to develop benchmarks on a smaller watershed scale such as the Willamette Basin. Discuss evaluation of current dilution rate and whether other dilution rates are necessary. Discuss any implementation issues related to monitoring and BMP requirements for discharges to impaired waterbodies.	6/15/2010	Summary of the input received from last meeting and respond to questions raised. Provide recommendations for benchmark project. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.
11 Water Quality Based Benchmarks and Watershed Permits	Provide update on benchmark project. Discuss approach for watershed permits and potential implementation steps.	Provide update on benchmark project and seek any additional feedback from the committee that may be necessary based on the water quality data evaluation. Discuss options/considerations for developing watershed permits. Discuss implementation issues related to watershed permits such as when will the updated plan be submitted and evaluated by DEQ and how any additional requirements will be built into the permit assignment letter and subject to public notice and comment.	7/20/2010	Summary of the input received from last meeting and respond to questions raised. Provide recommendations for implementation of watershed permits. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.
12 Monitoring Requirements	Discuss whether there are other pollutants besides the impairment pollutants and benchmark parameters that facilities should monitor for to better characterize the pollutants in their discharge. Share draft language for monitoring requirements and discuss any issues related to these requirements.	Discuss whether there are other pollutants besides the impairment pollutants and benchmark parameters that facilities should monitor for to better characterize the pollutants in their discharge. Discuss recommendations for monitoring approach for new permits. Share draft language for monitoring requirements and discuss any issues related to these requirements.	9/14/2010	Summary of the input received from last meeting and respond to questions raised. Provide evaluation of pollutants that may be commonly present in industrial stormwater that are not being monitored under the current permits. Provide draft language for monitoring requirements. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.
13 Wrap up on Monitoring and Discuss BMP effectiveness.	Discuss any remaining issues related to monitoring requirements for new permits. Discuss BMP effectiveness related to benchmark and impairment pollutant monitoring and corrective action requirements.	Discuss DEQ's evaluation of current technologies and anticipated BMP capabilities relative to benchmarks and water quality standards for impairment pollutants. Discuss any additional issues/comments on proposed monitoring approaches for the new permits.	11/16/2010	Summary of the input received from last meeting and respond to questions raised. Provide BMP effectiveness evaluation for groups of BMPs. Provide draft language for monitoring requirements. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.

Work Session	Purpose of Meeting	Discussion Items	Meeting Date	Deliverable
14 Water Quality Based Benchmarks	Discuss results of modeling and acceptable percentage of water quality standards exceedance	Discuss issues that DEQ considered in determining the appropriate rate of water quality standards exceedance. Discuss the purpose of the benchmarks. Discuss any issues that arose during the modeling of the stormwater data and the information that was imported into the model to come up with the results.	1/18/2011	Summary of the input received from last meeting and respond to questions raised. Provide explanation of model and options DEQ considered in evaluating appropriate rate for water quality standards exceedance. Identify issues/questions that will be put in "parking lot" and discussed in future meetings.
15 Water Quality Based Benchmarks and Corrective Action Requirements	Provide final results of water quality based benchmark for copper, lead and zinc and discuss recommendations for corrective action requirements.	Discuss the draft water quality based metals benchmarks and the corrective action requirements for benchmark exceedances. Discuss the tiers of corrective action requirements for benchmarks, impairment pollutants and Effluent Limit Guidelines.	2/15/2011	Summary of the input received from last meeting and respond to questions raised. Provide final results of benchmark results. Provide recommendation for corrective action requirements.
16 Comments on Draft Permits	Provide overview of draft permit requirements and obtain feedback from committee	Discuss major changes to proposed permits and how the changes address the issues/concerns raised by the Advisory Committee.	3/15/2011	Outline major changes to the proposed permits. Provide copy of draft permits.
17 Comments on Draft Permits	Provide overview of draft permit requirements and obtain feedback from committee	Discuss proposed permit language and any remaining issues/concerns raised by the Advisory Committee.	4/12/2011	Provide copy of draft permits.

Completion of Project: 35 day public notice and comment period (May 2 to June 6, 2011). Provide EPA with 90 days to review permits before they are finalized (May 2, 2011 to August 1, 2011) Complete response to comment document, fact sheet and final permits (June to August 30, 2011). Project complete August 31, 2011.

Draft: 4-12-10

