



WELCOME TO THE PUBLIC MEETING FOR THE DRAFT NPDES INDUSTRIAL GENERAL STORMWATER PERMIT

Please note that everyone is entering the meeting with their microphones muted.

**Please keep your microphones muted except when you are speaking.
This will help us minimize background noise.**

Please take a moment to open the Participants list and rename yourself to show your full name and affiliation, so we have that for our records. You should see a “Rename” option next to your name (or click on “More” to find this option).

To make a comment during this meeting, please do one of the following:

- **Indicate you would like to make a comment using the Chat feature.**
- **Under the Participants list, select the “raise your hand” option. The host will call on you to ask your question or make your comment.**



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

NPDES Draft Industrial Stormwater General Permit (IGP)

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EPD Watershed Protection Branch

Public Meeting
March 28, 2022



PURPOSE

- ❖ The Public Meeting will consist of an open forum period during which the public will be able to ask questions about the proposed permit.
- ❖ A Public Hearing will follow the public meeting. Formal statements may be made and entered into the official record during the public hearing.
- ❖ If you want to make an official comment for the record during the Public Hearing, please identify yourself in the chat up front so that we can prepare a speaker's list in advance.



HOUSEKEEPING

- ❖ Link to this recording can be obtained by emailing veronica.craw@dnr.ga.gov. Please include “IGP Meeting Recording” in the subject line of the email.
- ❖ Presentation will be posted in the Zoom chat
- ❖ Open for questions at end of presentation



PRESENTATION OUTLINE

- ❖ Permit Overview
- ❖ New Permit Requirements
- ❖ Permit Modifications
- ❖ Changes Since Stakeholder Version
- ❖ Questions

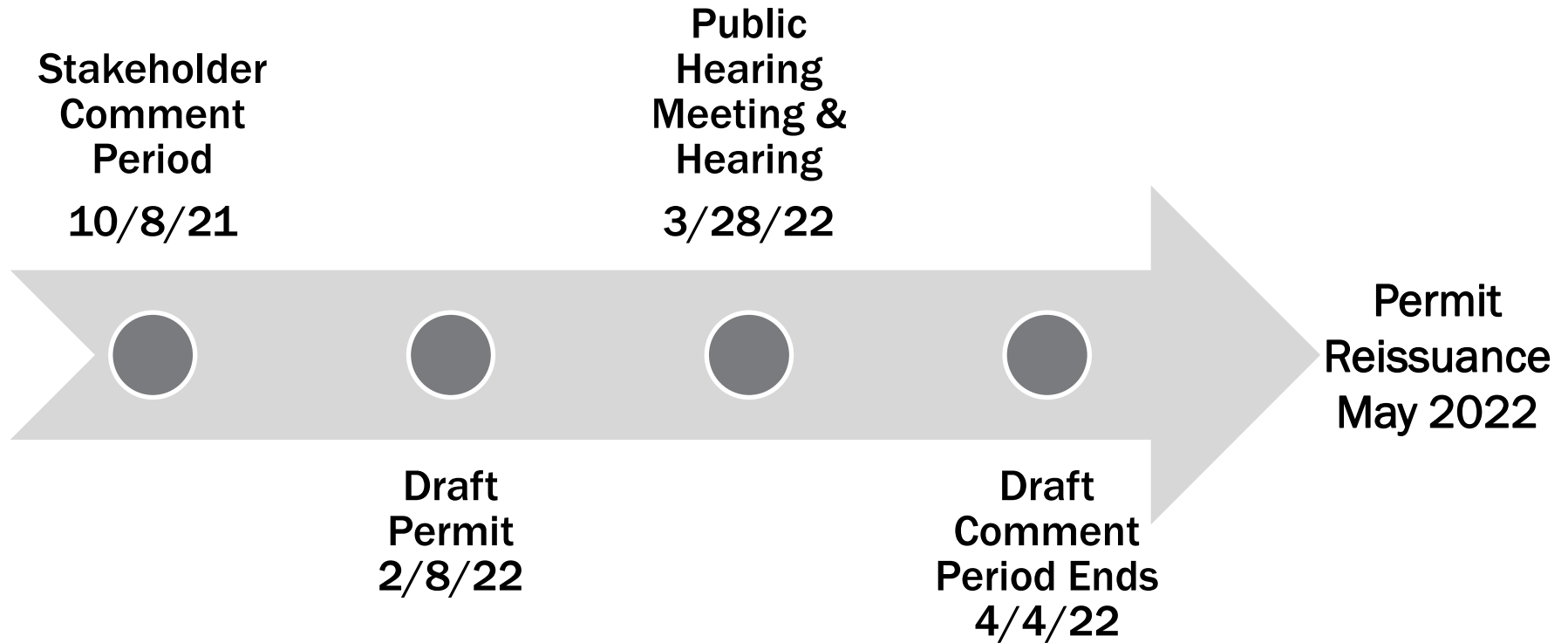


INDUSTRIAL STORMWATER GENERAL PERMIT

- ❖ Authorization to Discharge Under the National Pollutant Discharge Elimination System (NPDES) Storm Water Discharges Associated with Industrial Activity (Permit No. GAR050000)
- ❖ Current Permit – Expires on May 31, 2022
- ❖ The Draft Permit is available on GAEPDs website:
<https://epd.georgia.gov/forms-permits/watershed-protection-branch-forms-permits/storm-water-forms/npdes-industrial-storm>
- ❖ Draft Comment Period - Closes on April 4, 2022
 - ❖ Written comments on the draft permit should be sent to EPDComments@dnr.ga.gov by COB. Please include “Draft IGP GAR050000” in the subject line of the email.



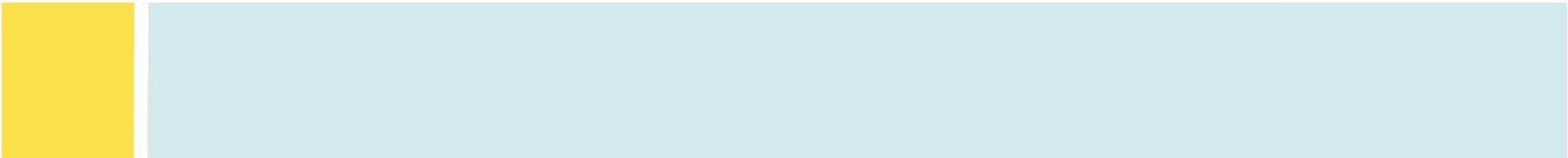
PERMIT RENEWAL PROCESS





IGP DRAFT PROPOSED PERMIT CHANGES

New Permit Requirements





REQUIREMENT TO POST A SIGN OF PERMIT COVERAGE – PART 1.3.7 (NEW)

- ❖ **What must be included on the sign?**
 - ❖ Permit coverage statement, NOI number, facility contact information, URL for SWPPP (if available), website for EPD where additional information about the Industrial Stormwater Permit can be found
- ❖ **Where must the sign be posted?**
 - ❖ Safe, publicly available location in close proximity to the industrial activity
 - ❖ Not required if prohibited by other laws or local ordinances or if there is no publicly accessible location in close proximity to the facility. Justification to be provided in SWPPP.
- ❖ **Why?**
 - ❖ To increase transparency and public awareness
 - ❖ Enhance inspection efficiency
 - ❖ Greater instances of renewals



INDICATOR MONITORING – PART 6.2.1 (NEW)

❖ What?

- ❖ pH, Total Suspended Solids (TSS), and Chemical Oxygen Demand (COD) – all Sectors
- ❖ Requirement met if parameter is a monitored benchmark or effluent limit
- ❖ Report only monitoring; annual; no thresholds; failure to monitor is a permit violation
- ❖ Includes exemption for inactive and unstaffed sites

❖ Why?

- ❖ 3 constituents commonly found in industrial stormwater pollution
- ❖ Serve as basic indicators of the effectiveness of BMPs



INDICATOR MONITORING – PART 8 (NEW)

Subsectors (Permittees may be subject to requirements for more than one sector/subsector)	Indicator Monitor Parameter	Indicator Monitoring Threshold
All Subsectors not already subject to benchmark or effluent monitoring for these parameters	pH	Report Only/No thresholds or baseline values
	Chemical Oxygen Demand (COD)	Report Only/No thresholds or baseline values
	Total Suspended Solids (TSS)	Report Only/No thresholds or baseline values



INDICATOR MONITORING – PART 6.2.1 (NEW)

❖What?

- ❖ Polycyclic aromatic hydrocarbons (PAHs) – only applicable to the following Sectors:
 - ❖ Sector A (facilities that manufacture, use, or store creosote or creosote-treated wood in areas exposed to precipitation), C (SIC 2911), D, F, I, M, O, P (SIC 4011, 4013, 5171), Q (SIC 4491), R, and S
- ❖ Report only monitoring; annual; no thresholds; failure to monitor is a permit violation
- ❖ Includes exemption for inactive and unstaffed sites

❖Why?

- ❖ Listed on EPA's Toxic Pollutants list 40 CFR 401.15
- ❖ Known to be extremely toxic and bioaccumulate in fish and aquatic invertebrates
- ❖ Known or probable human carcinogens
- ❖ Help to further inform SWPPP modifications



INDICATOR MONITORING – PART 8 (NEW)

Subsector (Permittees may be subject to requirements for more than one sector/subsector)	Indicator Monitor Parameter	Indicator Monitoring Threshold
Specific Sectors only	Polycyclic Aromatic Hydrocarbons (PAHs)*	Report Only/No thresholds or baseline values

* Monitoring is required for the 16 individual PAHs identified at Appendix A to 40 CFR Part 423: naphthalene, acenaphthylene, acenaphthene, fluorene, phenanthrene, anthracene, fluoranthene, pyrene, benzo[a]anthracene, chrysene, benzo[b]fluoranthene, benzo[k]fluoranthene, benzo[a]pyrene, benzo[g,h,i]perylene, indeno[1,2,3-c,d]pyrene, and dibenz[a,h]anthracene.



BENCHMARK MONITORING SCHEDULE - PART 6.2.2.2 (NEW)

- ❖ **Corrective actions needed after continued benchmark exceedances**
 - ❖ 4 quarterly exceedances – SWPPP review and implementation of additional pollution prevention/good housekeeping control measures beyond the initial response unless no further pollutant reductions are available or economically practicable
 - ❖ Additional 4 quarters of exceedances (2 full years of quarterly exceedances) – require installation of structural and/or treatment controls to reduce pollutants unless no further pollutant reductions are available or economically practicable
 - ❖ Added clarification regarding eligibility to resume annual benchmark monitoring once benchmark is met
- ❖ **Why?**
 - ❖ Provides a stronger enforcement pathway leading to compliance



NETDMR REPORTING – PART 7 (NEW)

❖ What is NetDMR?

- ❖ Network Discharge Monitoring Report – web-based application for entering and electronically submitting monitoring data
- ❖ DMR = Discharge Monitoring Reports

❖ What data will be submitted?

- ❖ Indicator Monitoring Data
- ❖ Benchmark Monitoring Data
- ❖ Effluent Limitation Monitoring Data
- ❖ Impaired Waters Monitoring Data

❖ Why?

- ❖ NPDES Electronic Reporting Rule (E-Rule) in 40 CFR 127



REPORTING & RECORDKEEPING – PART 7 (NEW)

- ❖ NetDMR reporting – submittal of all monitoring data using Discharge Monitoring Reports (DMR) in NetDMR
 - ❖ Indicator, Benchmark, Effluent Limits and Impaired Waters monitoring data
 - ❖ No Data Indicator (NODI) Code 9 = Conditional Monitoring Not Required
 - ❖ Effective with the reporting period starting on January 1, 2023 to streamline reporting during permit reissuance year
- ❖ Why?
 - ❖ Implementation of E-reporting requirements
 - ❖ Provides a better mechanism for EPD to assess compliance with the permit monitoring requirements



REPORTING & RECORDKEEPING – PART 7 (NEW)

- ❖ **Submission Deadline for Indicator, Benchmark, Effluent and Impaired Waters Monitoring and Sampling Data – Part 7.2**
 - ❖ DMRs are due on the 45th day following the reporting period
 - ❖ Quarterly reporting of monitoring data required

- ❖ **Why?**
 - ❖ To allow time for laboratory processing and results receipt
 - ❖ Aligns with most stringent sampling schedules prescribed in permit



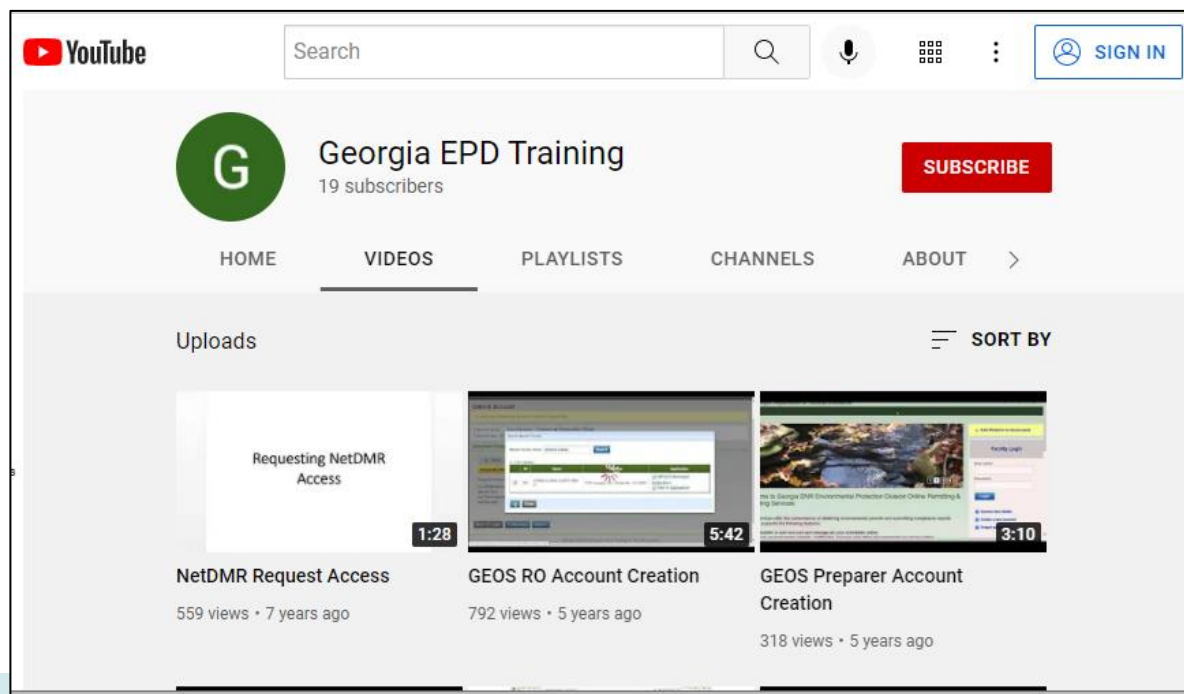
NETDMR – INFORMATION & TRAINING

EPD's NetDMRs Technical assistance website:

<https://epd.georgia.gov/forms-permits/eservices/netdmr-technical-assistance>

EPD's YouTube Channel:

https://www.youtube.com/channel/UCcyxSnoNoXDVctou_EyAeXQ/videos





IMPAIRED WATERS – APPENDIX C (NEW)

❖ Specific Requirements for Discharges into Water Bodies Impaired by Chlorophyll *a* – C.2.6

- ❖ Added language that requires biannual Total Phosphorous and Nitrogen (Nitrate + Nitrite) indicator monitoring for discharges into waters impaired for Chlorophyll *a*
- ❖ Applies to discharges into or upstream and within 1 linear mile

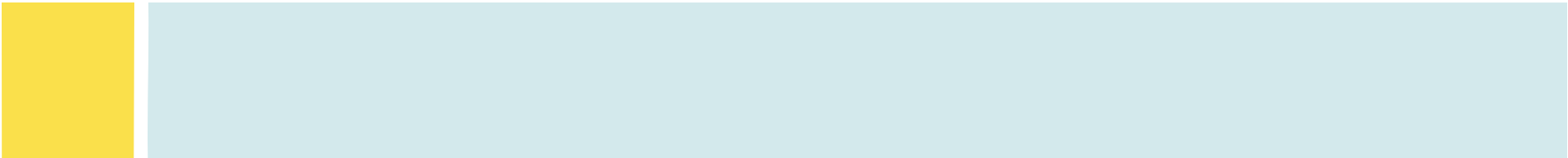
❖ Why?

- ❖ Consistent with water quality standards
- ❖ To provide a baseline and comparable understanding of industrial stormwater discharge quality relative to nutrients



IGP DRAFT PROPOSED PERMIT CHANGES

Modified Permit Requirements





BOILERPLATE CHANGES

Boilerplate updates throughout the permit include the following:

- ❖ Electronic reporting language & updates to be consistent with electronic reporting system
- ❖ Previous permit references
- ❖ Annual Report due dates
- ❖ Renumber to accommodate new sections and updated references
- ❖ Web links updated
- ❖ Minor language cleanup for consistency (i.e., permittee)



COVERAGE UNDER THIS PERMIT– PART 1 (MODIFIED)

- ❖ **Conditional Exclusion for No Exposure – Part 1.5**
 - ❖ Added listing of what materials or activities must not be exposed to precipitation in order to qualify for NEE
- ❖ **Why?**
 - ❖ Additional clarification in permit; already specified in NEE application form
 - ❖ List is a reiteration of 40 CFR Part 122.26(g)



INSPECTIONS – PART 4 (MODIFIED)

❖ Quarterly Visual Assessments – Part 4.2.2

- ❖ Added specific requirements to document rainfall (ie. rainfall amounts, duration and event dates & times)
- ❖ Clarified stormwater discharge observations to be documented - descriptions to include relative quality, quantity, or degree of each characteristic listed in Part 4.2.1

❖ Why?

- ❖ Ensure assessments are conducted during the appropriate qualifying rain event
- ❖ Clarify the minimum required documentation to be included with quarterly visual assessment inspection forms



INSPECTIONS – PART 4 (MODIFIED)

- ❖ Clarified that permittee must initiate corrective actions in accordance with Part 3 if routine, quarterly visual or annual comprehensive inspections show evidence of stormwater pollution due to industrial activities
- ❖ **Why?**
 - ❖ To ensure permittees are addressing potential sources of industrial stormwater pollution early on
- ❖ **Substantially identical outfalls – Part 4.2.3.3**
 - ❖ Specified that a visual assessment must be performed on each outfall at least once during the permit term
- ❖ **Why?**
 - ❖ To ensure all outfalls are being evaluated during the permit term



STORMWATER POLLUTION PREVENTION PLAN (SWPPP) – PART 5 (MODIFIED)

❖ Site Description – Part 5.1.3

- ❖ Added specific requirement to include the size & material type for the following: ditches, pipes, swales, stormwater inlets and outfalls and structural control measures

❖ Why?

- ❖ To ensure proper maintenance and facilitate structure identification

❖ Non-Stormwater Discharges – Part 5.1.4.4

- ❖ Clarified testing alternatives to smoke and dye test

❖ Why?

- ❖ Clarification; provide additional options

❖ Additional Documentation – Part 5.4

- ❖ On-line data management systems may be used provided they are readily available, viewable, and easily navigated

❖ Why?

- ❖ Modified to allow use of online data management systems



MONITORING – PART 6 (MODIFIED)

❖ Substantially Identical Outfalls – Part 6.1.1

- ❖ Modified to require indicator and benchmark monitoring to be conducted on a rotating basis for each substantially identical outfall to ensure each outfall is monitored at least once during permit term
- ❖ Allowance for an alternative sampling schedule if there are more than 5 substantially identical outfalls. Submit to the address listed in Part 7.

❖ Why?

- ❖ To confirm that the outfalls are discharging stormwater with substantially identical characteristics
- ❖ Alternative schedule provides for no increase in level of effort for facilities with >5 substantially identical outfalls



MONITORING – PART 6 (MODIFIED)

❖ Benchmark and Effluent Monitoring Schedules – Parts 6.2.2.2 & 6.2.3

❖ Requirement to conduct monitoring within one of the first two quarters of the calendar year or in the first full quarter of permit coverage, whichever comes first, or as soon as possible during the next qualifying rain event if none occurs during the specified time.

❖ Why?

❖ To ensure a qualifying rain event isn't missed during the year



SECTOR SPECIFIC - PART 8 (MODIFIED)

❖ **Sector L: Landfills, Land Application Sites, and Open Dumps**

- ❖ Removed reference to final regulatory closure
- ❖ Updated incorrect language from “post closure monitoring period” to “post closure care period”
- ❖ Added Part 8.L.2.3 Stormwater Discharges Associated with Construction Activities

❖ **Why?**

- ❖ To be consistent with Georgia Rules for Solid Waste Management
- ❖ Part 8.L.2.3 adds clarification pertaining to coverage under the Construction Stormwater General Permit

❖ **Sector J: Mining**

- ❖ Removed effluent limits associated with mine dewatering discharges

❖ **Why?**

- ❖ Mine dewatering discharges are a prohibited non-stormwater discharge and covered under GAG300000



DEFINITIONS - APPENDIX A (MODIFIED)

The following definitions have been added or revised:

- ❖ Impaired Stream Segments – revised web link
- ❖ Network Discharge Monitoring Report (NetDMR) - added
- ❖ New Discharger – revised to reference current permit
- ❖ Uncontaminated Discharge – added to replace definition of uncontaminated



IMPAIRED WATERS – APPENDIX C (MODIFIED)

❖ Specific Requirements for Discharges into Stream Segment Impaired by Bacteria – C.2.4

- ❖ Requires facilities to conduct sampling for current bacterial indicator

❖ Why?

- ❖ Aligns with proposed water quality standards
- ❖ Provides for transition from fecal coliform to *E. coli* or enterococci
- ❖ *E. coli* and enterococci are better indicators of fecal contamination and gastrointestinal illness



BENCHMARKS FOR HARDNESS DEPENDENT METALS – APPENDIX E (MODIFIED)

Revised for consistency with the most recent GA Rules for Water Quality Control

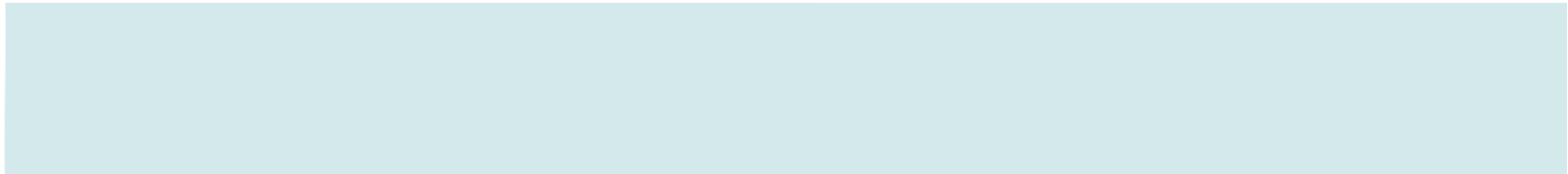
Revised Benchmarks

- ❖ Cadmium = 0.033 mg/L (saltwater)
- ❖ Cyanide = 0.0052 mg/L (freshwater)
- ❖ Table E-3 Hardness Ranges for Cadmium, Copper, Lead, Nickel and Zinc (freshwater)



IGP DRAFT PROPOSED PERMIT CHANGES

Changes Since Stakeholder Version





STAKEHOLDER PROCESS OUTCOMES

- ❖ **Allowable Non-Stormwater Discharges - Part 1.1.3**
 - ❖ Removed “if uncontaminated”, replaced with “provided that all discharges comply with the effluent limits set forth in Parts 2 and 8”
- ❖ **NOI Submittal Deadlines - Table 1.1**
 - ❖ Removed footnote regarding incomplete or inaccurate NOIs
- ❖ **Re-Notification - Part 1.3.4**
 - ❖ Clarified that notice should be provided in writing of intent to be covered by new or different permit
- ❖ **Signage (as discussed earlier) - Part 1.3.7**
- ❖ **Terminating Coverage - Part 1.4**
 - ❖ Clarified that submittal confirmation provided by the electronic system serves as confirmation of submittal
 - ❖ Removed requirement to submit outstanding ARs or monitoring data before NOT approval
- ❖ **Conditional Exclusion for No Exposure - Part 1.5**
 - ❖ Removed “now or in the foreseeable future”



STAKEHOLDER PROCESS OUTCOMES

❖ **Control Measures - Part 2.1**

- ❖ Removed Part 2.1.1.h related to implementing structural improvements and enhanced pollution prevention measures to minimize impacts from discharges from major storm events.

❖ **Subsequent Actions and Documenting Corrective Actions - Parts 3.3.2 & 3.4**

- ❖ Clarified that notification of corrective actions not completed within 90-day timeframe should be submitted in writing

❖ **Routine Facility Inspection Procedures - Part 4.1.1.1**

- ❖ Added “due to industrial activity” to clarify when corrective actions are triggered

❖ **Quarterly Visual Assessment Procedures - Part 4.2.1.3**

- ❖ Added “or observe” to further clarify laboratory analyses are not required
- ❖ Added “due to industrial activity” to clarify when corrective actions are triggered

❖ **Annual Comprehensive Site Inspections - Part 4.3.1**

- ❖ Added “due to industrial activity” to clarify when corrective actions are triggered



STAKEHOLDER PROCESS OUTCOMES

❖ Site Description - Part 5.1.3

- ❖ Added clarification that some site map information may be provided as an attachment to ensure the quality and legibility of map

❖ Non-Stormwater Discharges – Part 5.1.4.4

- ❖ Clarified that a smoke, dye, or equivalent test conducted after January 1, 2012, does not need to be repeated if there were no site alterations; removes reference to analysis “within the last 5 years”

❖ Making the SWPPP Publicly Available – Part 5.3.2

- ❖ Removed requirement to publicly post SWPPP; reverted to 2017 Permit language

❖ Additional Documentation Requirements – Part 5.4

- ❖ Clarified that documents should be made available to any regulatory inspector; removed “employee”



STAKEHOLDER PROCESS OUTCOMES

❖ **Monitored Outfalls and Substantially Identical Outfalls – Part 6.1.1**

- ❖ Clarified that substantially identical outfall monitoring applies to indicator and benchmark monitoring efforts
- ❖ Provides procedures for permittees with > 5 substantially identical outfalls
 - ❖ May submit an alternative sampling schedule
- ❖ Added benchmark exceedance to the inapplicability of monitoring only one substantially identical outfall
- ❖ Provided reference to Part 6.2.2.2 for additional information

❖ **Monitoring Periods – Part 6.1.7**

- ❖ Removed reference to monthly reporting in NetDMR

❖ **Applicability and Schedule of Indicator Monitoring**

- ❖ Added reference to Part 6.1.7
- ❖ Removed requirement for Indicator Monitoring of PAHs by facilities with stormwater discharges from paved surfaces that will be sealed or re-sealed with coal tar sealcoat.
- ❖ Requires beginning of PAH sampling in first full quarter of permit coverage



STAKEHOLDER PROCESS OUTCOMES

- ❖ **Exception for Inactive and Unstaffed Sites – Parts 6.2.1.2 and 6.2.2.3**
 - ❖ Requires notification in writing of cessation of monitoring
- ❖ **Benchmark Monitoring Schedule – Part 6.2.2.2**
 - ❖ Clarifies that annual benchmark sampling does not need to be repeated in calendar year of permit reissuance
 - ❖ Makes explicit reference to ability to determine that no further pollutant reductions are available upon four quarters of benchmark exceedances
 - ❖ Provides guidance on how to proceed with substantially identical outfall sampling if a representative outfall exceeds an annual benchmark
 - ❖ Permittee should proceed with quarterly sampling at the outfall showing the exceedance and proceed with rotational annual sampling of remaining outfalls
- ❖ **Effluent Limitation Monitoring – Part 6.2.3.1**
 - ❖ Requires sampling be conducted within one of the first two quarters of the calendar year ...(or as soon as possible...within the specified time frames)



STAKEHOLDER PROCESS OUTCOMES

❖ **Reporting and Recordkeeping – Part 7**

- ❖ Makes explicit that failure to implement electronic reporting is a violation of the permit
- ❖ Provides mailing address for some submittals and EPD notifications
- ❖ Other revisions as discussed earlier

❖ **Sector-Specific Requirements – Part 8**

- ❖ Removed Indicator Monitoring of PAHs for discharges from paved surfaces
- ❖ Revised Uncontaminated definition in Sector J (as discussed earlier)
- ❖ Added clarification language regarding stormwater discharges associated with construction activities to Sector L

❖ **Impaired Stream Segment Sampling and Requirements – Appendix C**

- ❖ Revised Part C.2.4 to remove “or Listed as Assessment Pending” and replaced with “or with a TMDL including a Bacteria Wasteload Allocation”
- ❖ Added “and within 1 linear mile” to waters impaired by Chlorophyll a
- ❖ Removed erroneous word



QUESTIONS

- ❖ To ask a question, please do one of the following:
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 - ❖ Under the Participants list, select the “raise your hand” option.
 - ❖ If you have joined by phone the moderator will call out your phone number.
 - ❖ The moderator will call on you to ask your question.
 - ❖ The moderator may limit speakers' time to ensure all participants have the opportunity to participate.
 - ❖ Statements that are lengthy or of a considerable technical nature should be submitted in writing for the official record.



REMINDERS

❖ Written comments on the draft permit due Monday, April 4, 2022

❖ Please include “Draft IGP GAR050000” in the subject line or at the top of the first page of comments

❖ Send via e-mail to EPDcomments@dnr.ga.gov

❖ Mailed to:

Georgia Environmental Protection Division
Nonpoint Source Program, Stormwater Unit
2 Martin Luther King Jr. Drive
Suite 1462 East
Atlanta, Georgia 30334

❖ EPD greatly appreciates email comments