



RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
RIPDES 2019 Multi-Sector General Permit (MSGP)

June 2019
Margarita Chatterton

2019 Multi-Sector General Permit (MSGP)

▶ *FINAL PERMIT*

▶ *SIGNIFICANT 2019 MSGP REQUIREMENTS*

▶ *RENEWING YOUR PERMIT*



2019 Multi-Sector General Permit (MSGP)

▶ 2019 MSGP REQUIREMENTS

▶ MONITORING

▶ BENCHMARKS

▶ PARAMETERS AND FREQUENCY

▶ CORRECTIVE ACTIONS

▶ IMPAIRED WATERS

▶ MONITORING

▶ WQBELs ENHANCED BMPs

▶ INSPECTIONS

▶ REPORTING:

▶ ELECTRONIC SUBMISSION, DUE DATES



2019 Multi-Sector General Permit (MSGP) Monitoring

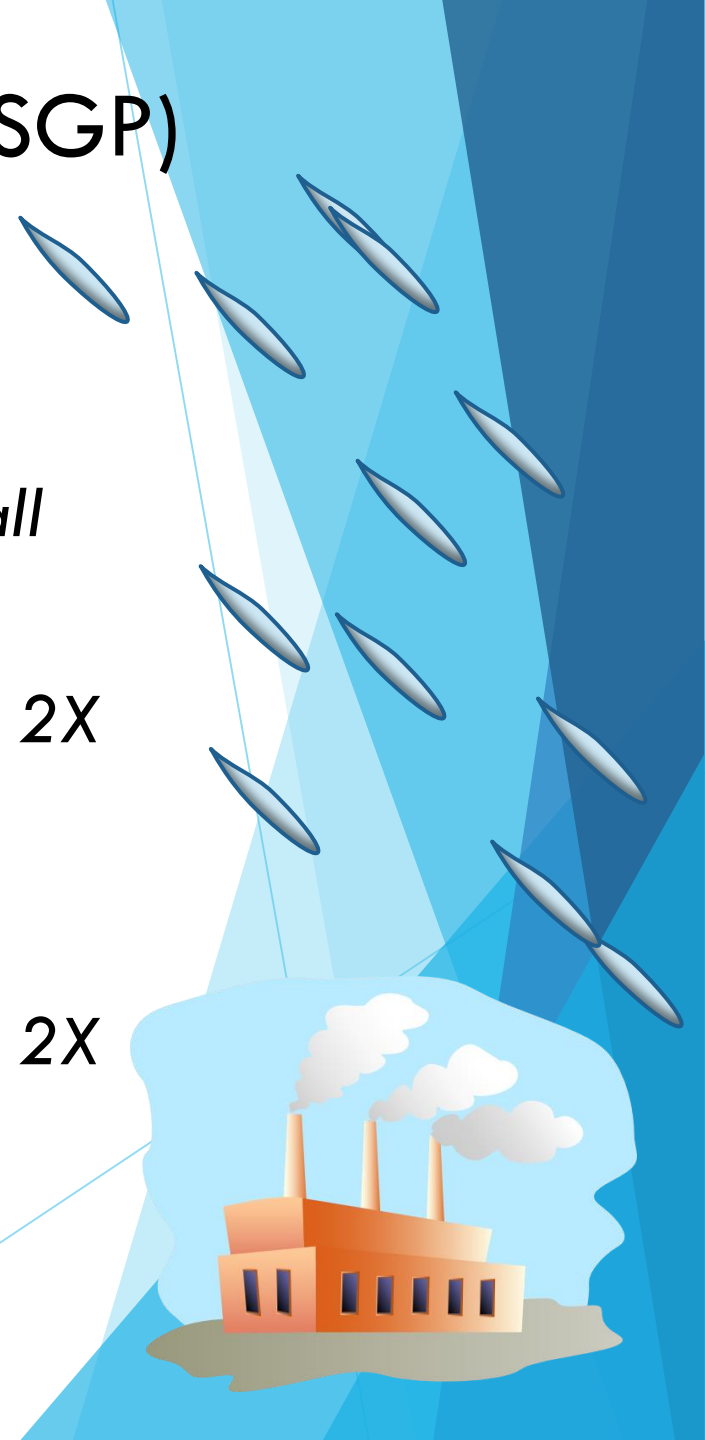
- ▶ *Benchmarks (BM) Monitoring*

- ▶ *Monitoring of TSS, and oil and grease applicable to all permittees*

- ▶ *Frequency: increased to 4 times per year (2X Jan-Jun, 2X Jul-Dec, one month minimum between sampling events)*

- ▶ *Impaired Waters Monitoring*

- ▶ *Frequency: increased to 4 times per year (2X Jan-Jun, 2X Jul-Dec, one month minimum between sampling events)*



2019 Multi-Sector General Permit (MSGP)

Where do I Sample?

Outfalls: locations where stormwater exits the facility property, including pipes, ditches, swales, and other structures that transport stormwater.

- ▶ Sample outfalls associated with industrial activity, except outfalls exempted as a “substantially identical outfall (SIO)”.
- ▶ SIO = Substantially identical effluents, similar industrial activities, control measures, exposed materials, and runoff coefficients of drainage areas.
- ▶ SIO must be identified in SWMP and NOI



2019 Multi-Sector General Permit (MSGP)

What do I Sample for?

- ▶ **Benchmarks:**
 - ▶ *TSS, oil and grease all permittees*
 - ▶ *Sector-Sub-Sector benchmarks (Part VIII of MSGP)*
- ▶ *Discharges to Impaired Waters: pollutants causing impairments*
- ▶ *Effluent Limitation Guidelines if applicable*
- ▶ **HARDNESS:** *discharges to fresh water with benchmarks for hardness dependent metals (Cadmium, Copper, Lead, Nickel, Silver, and Zinc)*

Water Hardness Range	Lead (mg/L)	Zinc (mg/L)
0-25 mg/L	0.014	0.04
25-50 mg/L	0.023	0.05
50-75 mg/L	0.045	0.08
75-100 mg/L	0.069	0.11
100-125 mg/L	0.095	0.13
125-150 mg/L	0.122	0.16
150-175 mg/L	0.151	0.18
175-200 mg/L	0.182	0.20
200-225 mg/L	0.213	0.23
225-250 mg/L	0.246	0.25
250+ mg/L	0.262	

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What do I Sample for?

Impairment Pollutants NOT Requiring Sampling	Impairment Pollutants Requiring Sampling	Sampling Parameter/Surrogate
Mercury	Aluminum	Aluminum
Dioxin (including 2,3,7,8-TCDD)	Cadmium	Cadmium
Polychlorinated biphenyls (PCBs)	Copper	Copper
PCB in Fish Tissue	Iron	Iron
Mercury in Fish Tissue	Lead	Lead
Mercury in Water Column	Zinc	Zinc
Fishes Bioassessments	Chloride	Chloride
Sediment Bioassays for Estuarine and Marine Water	Total Nitrogen	Total Nitrogen
Aquatic Macroinvertebrate Bioassessments	Total Phosphorous	Total Phosphorous
Benthic-Macroinvertebrate Bioassessments	Total Suspended Solids	Total Suspended Solids
Ambient Bioassays – Chronic Aquatic Toxicity	Turbidity	Total Suspended Solids
Whole Effluent Toxicity (WET)	Total Organic Carbon	
Taste and Odor	Dissolved Oxygen	Total Nitrogen (Salt Water) Total Phosphorous (Fresh Water)
Water Temperature	Enterococcus	Enterococcus
	Fecal Coliform	Fecal Coliform
	Escherichia coli	Escherichia coli
	Chlorophyll-a	Total Nitrogen (Salt Water) Total Phosphorous (Fresh Water)
	Nutrient/Eutrophication Biological Indicators	Total Nitrogen (Salt Water) Total Phosphorous (Fresh Water)
	Aquatic Plants – Native	Total Nitrogen (Salt Water) Total Phosphorous (Fresh Water)
	Excess Algal Growth	Total Nitrogen (Salt Water) Total Phosphorous (Fresh Water)

2019 Multi-Sector General Permit (MSGP) Sampling Procedures

- ▶ *Grab Sample - storm event results in a discharge and follows preceding measurable storm event by 72 hours.*
- ▶ *Samples collected within first 30 minutes of a measurable storm event.*
- ▶ *ONLY Report No Discharge if no measurable storm events occurred during the monitoring period.*
- ▶ *Samples must be analyzed consistent with 40 CFR Part 136 analytical methods and using test procedures with quantitation limits at or below benchmark values*

RI gets about 3 events/month ≥ 0.1 " precipitation separated by 72 hrs of "dry" period

MONTH	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC
# OF EVENTS	3.127	2.958	3.155	2.676	3.128	2.704	3	3.070	2.971	2.859	3.084	3.253

2019 Multi-Sector General Permit (MSGP) Benchmarks (BM)

- ▶ *Annual Average BM monitoring < BM, may discontinue sampling, per outfall, per parameter*
- ▶ *Annual Average BM monitoring > BM*
 - ▶ *BM exceedance is attributable solely to natural background, may discontinue sampling for the parameter after notifying DEM*
 - ▶ *BM exceedance is not attributable solely to natural background, must implement corrective actions as a series of escalating responses*



Natural Background



- ▶ Natural conditions are those that aren't caused by humans and can alter a waterway's physical, biological or chemical makeup (wildfires, floods, earthquakes, volcanic or geothermal activity, wind, insect infestation, and diseased vegetation).
- ▶ Natural background pollutants are substances that naturally occur in soils or groundwater, do not include pollutants from earlier activity on the site, or pollutants from neighboring sources that are not naturally occurring.
- ▶ If a permittee sampling exceedances are solely attributed to the presence of pollutants in natural background and not associated with industrial activities a natural background waiver report may be submitted.

REQUIREMENTS
Proposed: Benchmarks Monitoring for TSS and Oil and Grease Applicable to all Sectors.
Benchmarks Monitoring 4X per year - 2X January-June + 2X July-December

- Y1 and Y2 exceedances require submission of summary of CA for each BM exceedance with AR.
- Y3 Exceedances require submission of CA Report (within 90 days following monitoring year), includes: non-industrial pollutant source demonstration or engineering report for treatment BMPs for DEMs approval.
- With AR - Summarize level 3 CA. Continue Benchmarks Monitoring 4X per year.

Average of 4 consecutive Samples > BM?

NO

- May discontinue BM Monitoring for the parameter and no corrective actions necessary

Is exceedance solely attributable to natural background?

YES

- Notify DEM that exceedances are attributable solely to natural background, provide rationale
- Document supporting rationale in SWMP
- Corrective Action (CA) not required

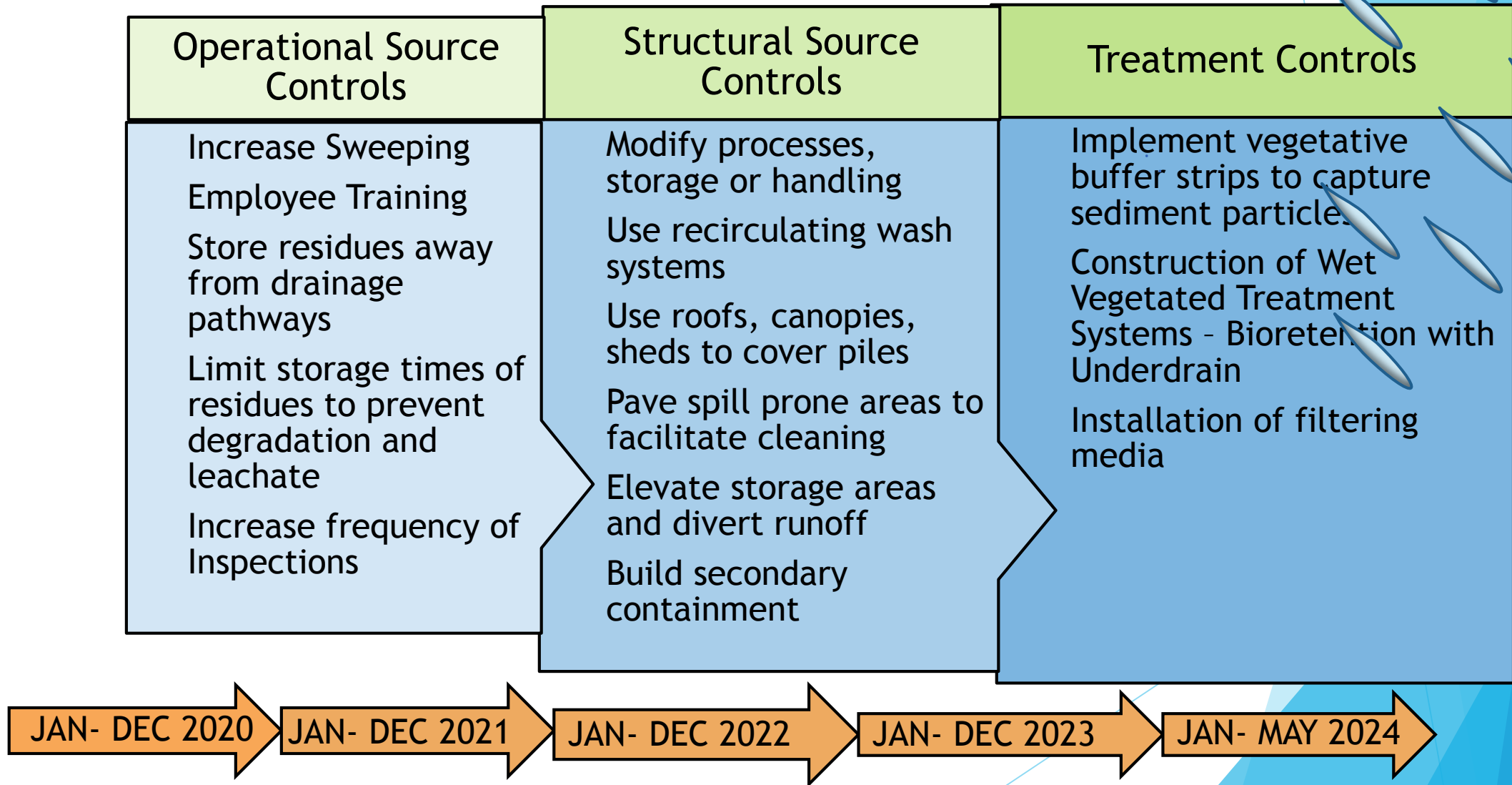
NO

CORRECTIVE ACTIONS

- YEAR 1 Exceedances: Operational source control BMPs. Continue Benchmarks Monitoring 4X per year
- YEAR 2 Exceedances: Structural source control BMPs (6 months to implement). Continue Benchmarks Monitoring 4X per year.

YEAR 3 Exceedances (following installation of structural source controls Y2.5-Y3.5): Install Treatment BMPs unless Non-Industrial Pollutant Source or run-on Demonstration; or pollutant reductions technologically available and economically practicable and achievable.

Corrective Actions Due to Benchmarks Exceedances (BM)



2019 Multi-Sector General Permit Impaired Waters Water Quality Based Effluent Limits

- ▶ *Facilities with discharges to non-bacteria/pathogens impaired waters:*
 - ▶ *Include enhanced BMPs (e.g., sweeping, garbage)*
- ▶ *Discharges to waters with bacteria impairments:*
 - ▶ *Additional enhanced controls, including: Use known, methods to prevent rodents, birds, and other animals from feeding/nesting/roosting at the facility; annual dry weather inspection of the stormwater system; install structural source control BMPs (e.g., dumpsters, compost piles, food waste, and animal products).*



2019 MSGP Electronic Applications



NEW: No Discharge Certification applies to facilities with industrial activities, equipment, and materials exposed to stormwater that do not discharge that stormwater from the facility or discharge to Combined Sewer Systems

2019 Multi-Sector General Permit

 *No Sampling Requirements for 2019. Sampling will begin January 1, 2020. All other requirements stay in place.*

▶ *Stormwater Management Plan (SWMP) must be amended to meet the requirements of the 2019 MSGP:*

Monitoring:

Benchmarks: parameters and frequency,

Pollutant Causing Impairment frequency

Water Quality Based Effluent Limits

Inspections

Reporting

SWMP Template at:

<http://www.dem.ri.gov/programs/water/permits/ripdes/stormwater/industrial.php>



2019 Multi-Sector General Permit

May 3, 2019-August 2, 2019 Existing Permittees must electronically submit Notice of Intent (NOI) and upload SWMP or provide URL where SWMP is available

▶ *Electronic Submission:*

▶ *Application:*

▶ *Notice of Intent (NOI)*

▶ *No Exposure Certification (NEC)*

▶ *No Discharge Certification (NDC)*

▶ *Reports: DMRs (due dates: January 15 and July 15 following monitoring period), Annual Reports (**First Annual Report Due January 30, 2020 will be made available on-line**)*

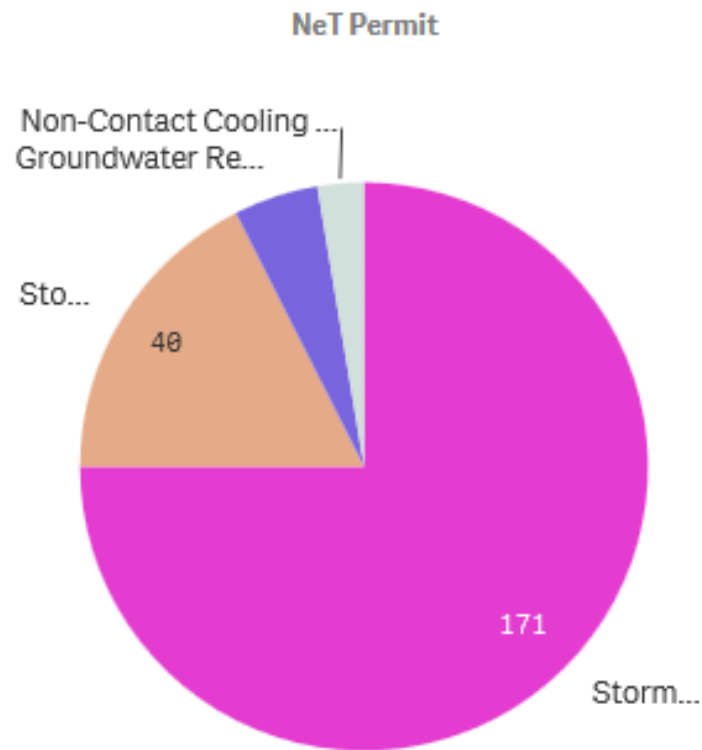
2019 Multi-Sector General Permit

Notice of Intent(NOI) Requirements:

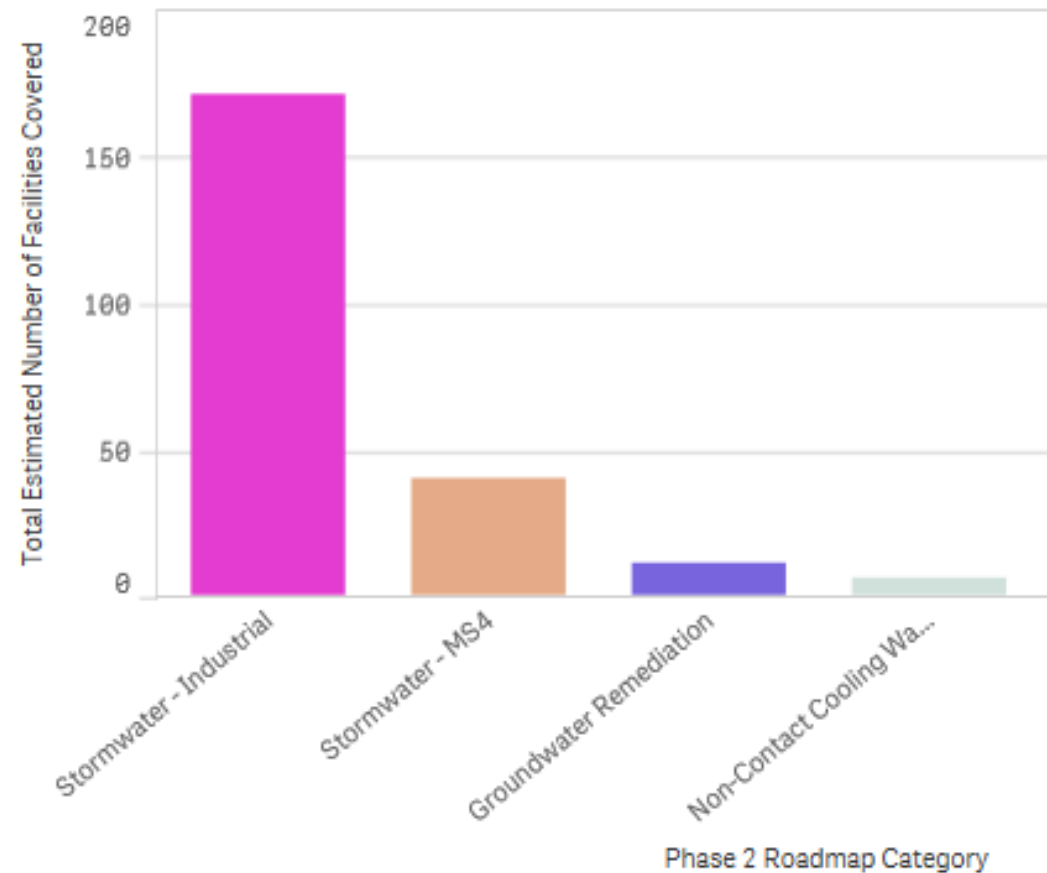
- ▶ *Owner/Operator Information (name, address, and contact information)*
- ▶ *Facility Information: Name, location address, Latitude/Longitude, Primary Sector and Subsector, Primary SIC Code*
- ▶ *List of all stormwater outfalls associated with industrial activity*
- ▶ *For each Outfall: applicable sectors/sub-sectors, Effluent Limitation Guideline(s), Receiving Water – Waterbody Name or if Unnamed Stream or Wetland; Receiving Waterbody ID (WBID) Number; Receiving Water is Saltwater or Freshwater?; Receiving Water is Listed as Impaired; Pollutant(s) Causing Impairment*
- ▶ *Stormwater Management Plan (SWMP)*

2019 Multi-Sector General Permit Rhode Island Stormwater

Facility Counts by Roadmap Category



Facility Count by Roadmap Category



2019 Multi-Sector General Permit Current Outreach

- ▶ *Business database, information on existing registered businesses*
- ▶ *Filter potential businesses by primary SIC codes and facility operations*
- ▶ *Mail and track responses*
 - ▶ *2010 mailing 200 businesses, 92% response, 75 No Exposure Certifications and 6 Permit Applications*
 - ▶ *2019 filtered 3,000, first mailing to approx. 500 facilities end of July*

Questions?

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