

AZPDES MSGP-2010

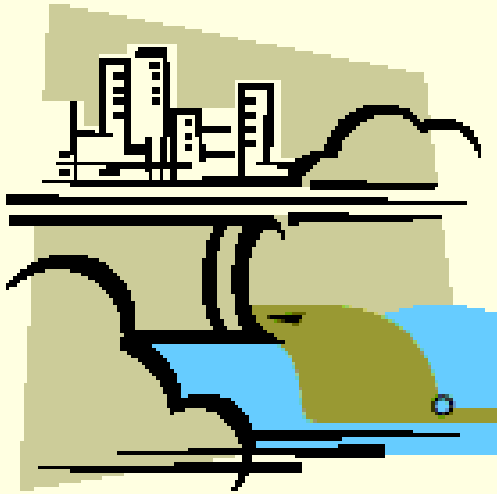
What Now?

**SAEMS Regulatory Roundup
February 23, 2011**

Existing dischargers

**MSGP-2000 coverage is
administratively continued
UNTIL you receive new
Discharge Authorization
under MSGP-2010**

Other dischargers



**MSGP-2010
coverage begins
when you receive
Discharge Authorization**

Obtaining Coverage

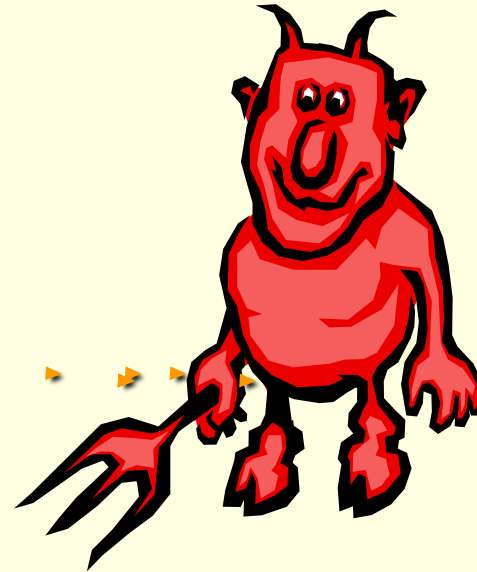
To obtain MSGP-2010 coverage:

- Prepare/revise SWPPP
- Implement SWPPP
- Complete and file NOI

Getting to Know the MSGP

Requirements are found in:

- Fact Sheet
- Permit
- Sector
- Appendices



Read all of it!

SWPPP Changes

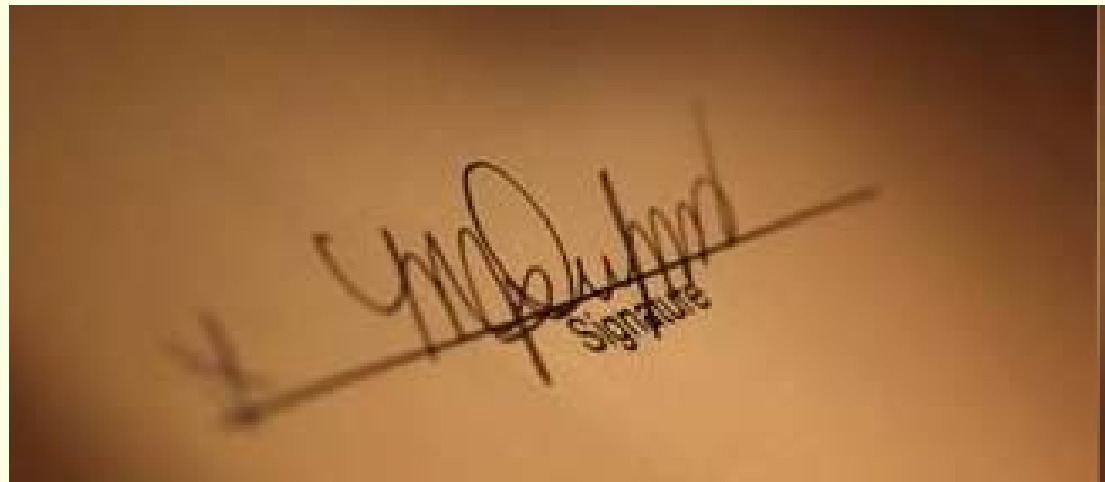
Two kinds:

- Administrative
- Substantive



Administrative

- Site maps
- Potential pollutant time frame
- Signature requirements



Site Maps

- **property size in acres**
- **structures and imperious surfaces**
- **discharges to MS4s**
- **monitoring locations**
- **stormwater inlets and outlets**
- **outfalls receiving non-storm water discharges**
- **dry wells**

Pollutants

- **Pollutants associated with current industrial activities**
- **Past activities or incidents that may impact present stormwater discharges**

No more three year limit

Signatory Requirements

NOI signatory must have management authority:

- **Decision-making functions**
- **Capital investment responsibility**
- **Responsibility for overall operations**

Signatory Requirements

May appoint duly authorized representative to sign other reports and plans:

- Authorized in writing
- Kept with SWPPP
- Responsibility for overall operations

Substantive Changes

- **Control Measures**
- **Monitoring**
- **Inspection**
- **Corrective Action**
- **Reporting**
- **Recordkeeping**

Control Measures

~~BMPs~~

Control
Measures

New Control Measures

- Salt storage
- Non-stormwater discharges
- Litter, garbage and floatable debris
- Dust generation



More CM Detail

Good housekeeping:

- Regular sweeping
- Materials ordered and labeled
- Storage in appropriate containers
- Clean spills promptly
- Use drip pans



Required Monitoring

- **Benchmark**
- **Effluent limitation**
- **Impaired water**
- **As required by ADEQ**



Sampling & Analysis Plan

- Only if monitoring required
- Part of the SWPPP
- Covers sample collection, preservation, tracking and handling
- Analytical methods & labs
- Recordkeeping

Inspections

Three types:

- Routine facility inspections
- Visual assessment of stormwater discharges
- Comprehensive facility inspections



Routine Inspections

Changes:

- Minimum quarterly frequency
- One during discharge
- Include PPT member
- Signed certification statement



Visual Assessments

Changes:

- Twice each wet season
- Well lit area
- Document deviations
- Signed certification statement



Comprehensive Facility Inspections

Changes:

- **New recordkeeping requirements**
- **Outstanding/ impaired must submit to ADEQ**
- **Signed certification statement**

Measurable Storm Event

For monitoring and visual assessment:

- Results in a discharge
- Follows preceding event by at least 72 hours

Inactive & Unstaffed

Exception for:

- Benchmark sampling
- Routine Inspection
- Visual Assessment

Provided there is no exposure

Substantially Identical

Exception for:

- Benchmark sampling
- Visual Assessment

Must rotate between
SI outfalls



Corrective Action

More detail provided:


- Specific triggering events
- Required reporting
 - ▶ 72-hour
 - ▶ 14-day

Reporting

- **Data Monitoring Reports***
 - **Annual Report***
 - **Exceedance Reports**
 - **Other**
- * Submittal to ADEQ required only for certain facilities**

Annual Reporting

Form coming from ADEQ Similar to EPA MSGP-2008 Annual Report Form

| | | | |
|---|----------------------|---|---|
|  | | UNITED STATES ENVIRONMENTAL PROTECTION AGENCY WASHINGTON, DC 20460 | |
| Annual Reporting Form | | | |
| A. GENERAL INFORMATION | | | |
| 1. Facility Name: | <input type="text"/> | | |
| 2. NPDES Permit Tracking No.: | <input type="text"/> | | |
| 3. Facility Physical Address: | | | |
| a. Street: | <input type="text"/> | | |
| b. City: | <input type="text"/> | c. State: | <input type="text"/> |
| | | d. Zip Code: | <input type="text"/> - <input type="text"/> |
| 4. Lead Inspectors Name: | <input type="text"/> | Title: | <input type="text"/> |

Recordkeeping

New SWPPP documentation:

- Structural control measure repairs
- Deviations for visual assessments & monitoring
- Corrective Actions
- SAP

Logs and Forms

Inspections and monitoring forms should be reviewed for new requirements

All forms need to include the Certification statement

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

MSGP Fees

Fee-based program now:

- NOI and annual fees
- Based on acreage
- Not yet final



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Questions



Contact Information

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