



The 2017 Draft Multi-Sector General Permit (MSGP)

CHRISTY WITTERS

&

JAMIE BATES

Vermont Department of
Environmental Conservation
Watershed Management
Stormwater Program



MSGP Overview

- ❖ Authority
- ❖ Purpose
- ❖ What's new?
- ❖ Next Steps for reapplying



Authority

The Clean Water Act (CWA) requires the U.S. Environmental Protection Agency (EPA) to authorize discharges through issuance of National Pollution Discharge Elimination System (“NPDES”) permits for “stormwater discharge associated with industrial activity” (November 16, 1990).



What is the Multi-Sector General Permit 3-9003?

- ❖ The general permit covers all discharges (stormwater and selective non-stormwater) from industrial activities.
- ❖ 2011 MSGP Expired August 4, 2016
- ❖ The Secretary deemed all issued MSGPs, including Certification No Exposure (NOX), as Administratively Covered

Updates from the 2011 to 2017 MSGP Overview

- ❖ Information Required for the Notices of Intent (NOI)
- ❖ Electronic Data Monitoring Reporting Requirements (eDMR)
- ❖ Effluent Limit Clarifications
- ❖ Inspections
- ❖ Corrective Actions
- ❖ SWPPP Availability
- ❖ Industry Sector-Specific Requirements
(A, G, H, J, S)



Information Required for the Notices of Intent (NOIs)

Operators now need to:

- ❖ Include location information for each stormwater outfall they discharge from,
- ❖ Identify the hardness of the receiving water (if subject to benchmark monitoring for metals),
- ❖ Determine the outfall latitude and longitude information for each outfall, to verify discharges into impaired water

DECIMAL DEGREES:

44.319547, -72.886328

NOT

DEGREES, MINUTES, SECONDS:

44° 19' 10.3692", -72° 53' 10.7808"





Electronic Data Monitoring Report (eDMR)

- ❖ The EPA has made it a requirement to submit eDMR for all data monitoring of your sites discharge points.
- ❖ We are currently working with a company named *Windsor Solutions* who is helping us comply with the EPA required form fields
- ❖ This is something that will be accessible to you via our website



Effluent Limit Clarifications (Parts 2.1.2 and 8)

- ❖ Requirements for minimizing exposure
- ❖ Good housekeeping
- ❖ Maintenance
- ❖ Spill Prevention and Response Procedures
- ❖ Employee training





Inspections (Part 3)

- ❖ Consolidated the Comprehensive Site Inspection and the Routine Facility Inspection Procedures



Corrective Actions (Part 4)

❖ SWPPP review and availability at:

<https://anrweb.vt.gov/DEC/ERT/StormWater.aspx>

❖ Modified deadlines:

❖ Corrective Actions need to be reported within 24 hours of discovery and have 14 day solution plan, 14 days to say infeasible and why, but no longer than 45 days after discovery. You must update your SWPPP within 14 days

❖ Reporting Requirements



Industry Sector-Specific Requirements (A, G, H, J, S)

❖ Sector A, Timber Products:

Discharges from uncontaminated spray down/wet deck storage is an allowed non-stormwater discharge

❖ Sector G & H, Metal Mining & Coal Mining:

Earth disturbing activities conducted prior to mining; needs a Construction General Permit (CGP 3-9020) or an Individual Construction Permit (INDC)

❖ Sector J, Mineral Mining and Dressing:

Includes construction requirements for the MSGP and is consistent with the CGP 3-9020 and must comply with the **Erosion Prevention and Sediment Control Plan** (Part 8.J.1.1) in terms of stabilization, mitigation, reclamation, and pollution prevention

❖ Sector S, Air Transportation:

Added Effluent Limit Guidelines (ELGs) for jet and airport deicing operations



HOW TO APPLY?

1. Submit a new NOI form, or a new NOX form
2. Update your SWPPP; NOX does not require an updated SWPPP

Fees:

- ❖ *If your permit expired in 2016, then you must pay the Administrative processing fee*
- ❖ *If your permit expired prior to 2016, then you will have to pay and Administrative processing fee and an Application fee*



NOI Submission Deadlines

- ❖ **June 1, 2017** for Operators of industrial activities that were authorized for coverage under the 2011 MSGP (except for facilities that include Sector “A” and “J” activities)
- ❖ **September 1, 2017** for Operators of Sector “A” and “J” industrial activities that were authorized for coverage under the 2011 MSGP
- ❖ **New operators** of existing industrial activities with discharges previously authorized under the 2011 MSGP, and operators of industrial activities that commence discharging after Permit Issuance Date. A minimum of **30 days** prior to the date of transfer of control to the new operator or prior to the commencement of the discharge.



QUESTIONS???

VT Agency of Natural Resources

DEC Stormwater Management Program

c/o Jamie Bates

1 National Life Drive, Main 2

Montpelier, VT 05620-3522

Or electronically to Jamie.Bates@vermont.gov

Or call: 802-490-6159