

RIPDES Multi-Sector
Industrial Stormwater
General Permit (MSGP)

Stakeholder Workshop

April 25th and 30th, 2024



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RIPDES Municipal and Industrial Stormwater Program

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Workshop Agenda

1. Introductions & Meeting Logistics
2. RIPDES MSGP Overview
3. Proposed Changes
4. Permit Reissuance Process & Schedule
5. Questions & Feedback

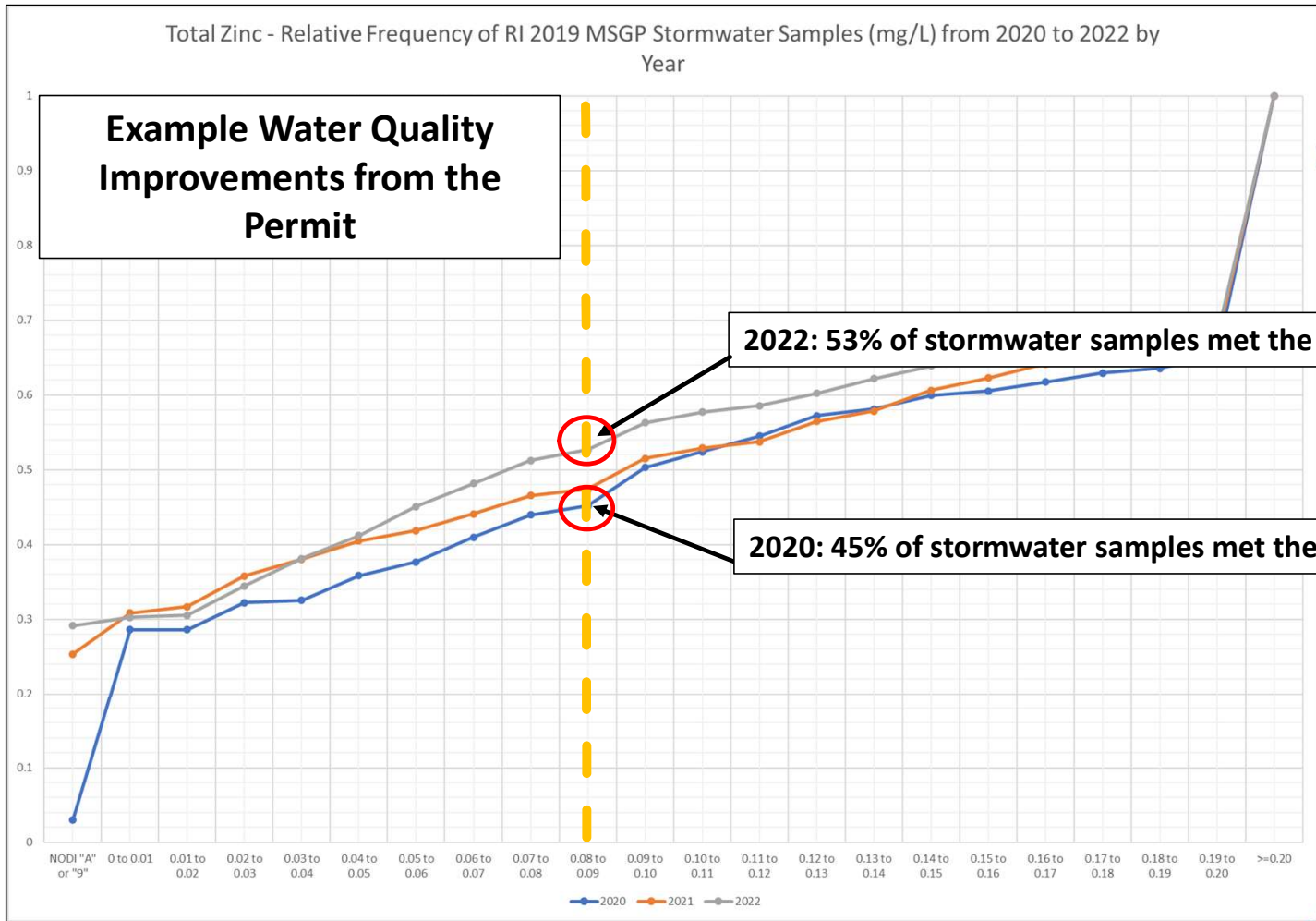


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RIPDES MSGP Overview

- The MSGP was issued in 2006, 2013, and 2019. We intend to reissue the MSGP again in 2024.
- Adaptive Management and Pollution Prevention are the Cornerstones of the RIPDES Industrial Stormwater Program
 - Site Specific Stormwater Management Plan
 - Outfall Monitoring and Routine Inspections
 - Tiered Corrective Action Requirements
 - Annual Reporting
 - RIDEM Compliance Monitoring Efforts
 - Annual Inspections and Audits
 - Monitoring DMR Submissions, Annual Reports, and Corrective Action Reports





Example Water Quality Improvements from the Permit

2022: 53% of stormwater samples met the Zinc benchmark for water quality

2020: 45% of stormwater samples met the Zinc benchmark for water quality

In 2022 compared to 2020, discharges of zinc in stormwater from marinas and boat builders was reduced.



Basis for the Proposed Changes

- Lessons Learned from Implementation of the 2019 RIPDES MSGP:
<https://dem.ri.gov/programs/benviron/water/pn/ripdes/msgp.pdf>
- Adoption of Elements from EPA's 2021 MSGP:
<https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp>
- 2019 Study published by the National Academies of Science, Engineering, & Medicine entitled "*Improving the EPA Multi-Sector General Permit for Industrial Stormwater Discharges*" (2019 NRC Study):
<http://nap.edu/25355>



New Benchmark Requirements

- **Universal**
 - Total Suspended Solids (TSS) and Chemical Oxygen Demand (COD)
 - Applies to All Sectors
 - Oil & Grease replaced with COD as a universal benchmark parameter
- **Oil & Grease (Note: was previously part of the universal benchmarks)**
 - Sector I - Oil and Gas Extraction
 - Sector M - Automobile Salvage Yards
 - Sector N - Scrap Recycling and Waste Recycling Facilities
 - Sector P - Land Transportation and Warehousing
 - Sector Q - Water Transportation
 - Sector R - Ship and Boat Building and Repair Yards
- **Copper**
 - Sector M - Automobile Salvage Yards
 - Sector Q - Water Transportation
 - Sector R - Ship and Boat Building and Repair Yards
 - Sector AA - Fabricated Metal Products



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New Benchmark Requirements continued....

- **Polychlorinated Biphenyls (PCBs)**

- Sector N - Scrap Recycling and Waste Recycling Facilities engaged in the processing of construction and demolition (C&D) debris

Note: The 2019 RIPDES MSGP required PCB benchmarks for Sector N previously but only for those facilities where shredding activities and/or shredding materials are exposed to stormwater. This previous requirement will continue to apply.

- **Aluminum, Copper, Lead, Zinc**

- Sector P - Land Transportation and Warehousing, including transfer stations, where the temporary storage and/or transfer of solid waste (not including recyclables) is exposed to stormwater.



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New Benchmark Requirements continued....

- **Antimony BM Reduction**

- The benchmark concentration will be reduced from 0.64 mg/L to 0.45 mg/L to be consistent with current RI Acute Water Quality Criteria established in the RI Water Quality Regulations (250-RICR-150-05-1)
 - Affects Subsector G2 (Metal Mining) only.

- **Removal of Magnesium**

- Applies to Sector K - Hazardous Waste Treatment, Storage, or Disposal Facilities

- **Removal of Iron**

- Applies to Industrial Subsectors C1, C2, E2, F2, G2, H1, L2, M1, N1, O1, Q1, R1 and AA1.



New Benchmark Requirements continued....

- **Enhancements to BM Monitoring Requirements**
 - **Section VI.B.1.c “Data Not Exceeding Benchmarks”** has been modified:
 - If <4 BM samples were collected for any one parameter in the year Semi-Annual BM monitoring must continue.
 - **Section VI.B.1.d “Data Exceeding Benchmarks”** has been modified:
 - If <4 BM samples were collected for any one parameter in the year, and the average of the remaining sample results exceeds the BM for a given parameter - Corrective Actions will be triggered.



Indicator Monitoring

- **New Category of Monitoring**
- **Applies to Sector P - Land Transportation and Warehousing, including transfer stations, if engaged in the temporary storage and/or transfer of solid waste that is exposed to stormwater (not including recyclables).**
 - Enterococcus (a.k.a. Entero)
- **Differs from Benchmark Monitoring**
 - Indicator category has been established for Entero as this parameter is difficult to eliminate completely from stormwater
 - Data collected will assist in minimizing bacteria levels in stormwater by enabling facilities to track trends, to further inform corrective action implementation, and SWMP revisions



Corrective Action Requirements

- **Corrective Action Report submissions will need to be electronic via uploading with Annual Report in NeT-MSGP (CDX)**
- **The Corrective Action Report must document any corrective actions that were implemented over the past year or corrective actions that are planned for the following year.**
- **Any operational, structural, or treatment BMPs that were proposed/installed as corrective actions under the 2019 MSGP must be installed/maintained under the 2024 MSGP.**



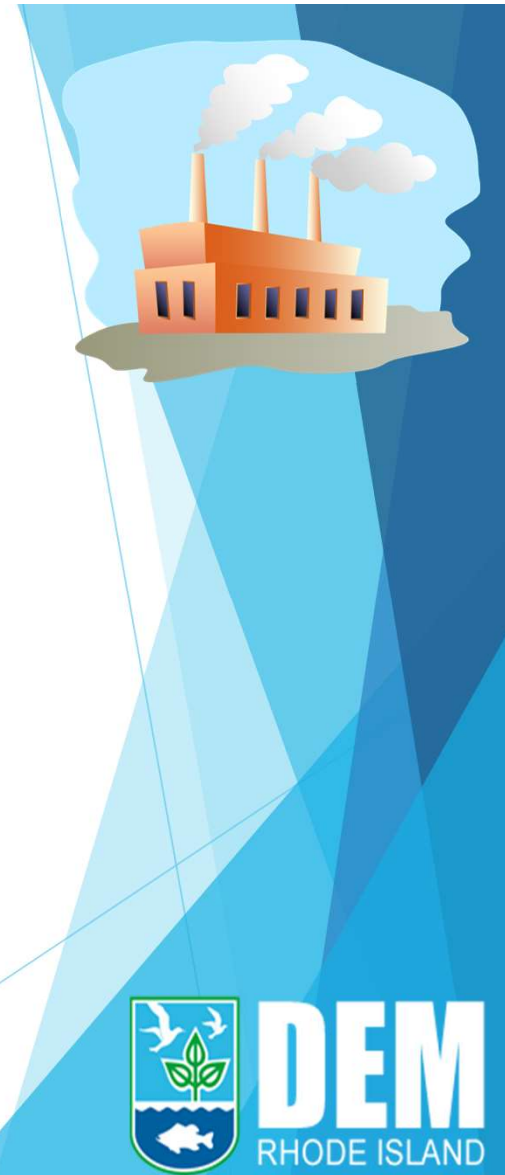
Allowable Non-Stormwater Discharges

- **Building Washdown/Power Wash Water**
 - Operators who discharge routine external building washdown and/or power wash water must take steps to:
 - Filter
 - Detain
 - Settle Solids or Other Pollutants
 - Consistent with the 2021 EPA MSGP
- **Pavement Wash Water (New)**
 - No detergents or hazardous cleaning products allowed
 - O&G, sources of industrial pollutants, or any other toxic or hazardous materials must be first cleaned up using dry methods.
 - Filter, Detain, and Settle solids and other pollutants prior to discharge
 - Consistent with the 2021 EPA MSGP



Minimizing Stormwater Impacts from Major Storm Events

- **Permittees must implement structural improvements, enhanced/resilient pollution prevention measures, and/or other mitigation measures to minimize the impacts of major storm events such as hurricanes, storm surge, extreme/heavy precipitation, and flood events.**
 - Evaluate likelihood of impacts from major storm events based on the facility location. Appendix E of the permit includes guidance and links to online maps.
 - Develop strategies in the SWMP to minimize pollution potential, examples to consider:
 - Temporarily storing materials and potential pollutants above the Base Flood Elevation (BFE) level;
 - Reinforcing materials storage structures to withstand flooding and additional exertion of force;
 - Temporarily reducing or eliminating outdoor storage;
 - Plan for future site improvements, considering facility location and storm event risks.



Miscellaneous Changes

- Required monitoring must be completed even if the qualifying rain event is outside of normal business hours.
- The Automatic Transfer option will be eliminated in NeT-MSGP (CDX). Permits must be terminated by existing owner and then a new owner will need to submit a new NOI.
- SWMPs must be uploaded as part of the NOI submission, weblinks are no longer an option to comply.
- Record Keeping: Records must be maintained for 5 years rather than 3 years to be consistent with the RIPDES Regulations.
- Applicants must provide a six-digit North American Industry Classification System (NAICS) code as part of Notice of Intent (NOI) submission
 - SIC/NAICS code crosswalk table is provided in the permit;
 - SIC codes will continue to determine sector specific requirements



Permit Reissuance Process & Schedule

- **Anticipated Public Notice of 2024 Draft MSGP: Late May (30-day PN period)**
- **RIDEM will respond to any comments received in writing and either issue the permit as originally drafted, issue it with minor changes, or not issue the permit as drafted.**
- **Anticipated 2024 MSGP Effective Date: Early Fall 2024**
- **Outfall Sampling to begin January 1, 2025**
- **Reminders for Facilities Authorized under the 2019 MSGP**
 - Continue to comply with the 2019 MSGP after May 2, 2024, expiration.
 - No Exposure Certification (NEC) and No Discharge Certification (NDC) exclusion holders not be affected by the permit expiration - must renew every 5 years independent of permit schedule.
 - Renewal NOI and updated SWMP must be submitted within 90 days of the effective date.



Questions and Feedback

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