

2024 RIPDES Multi-Sector Industrial General Permit

Summary of Changes

Refer to the 2024 MSGP Factsheet for a more detailed explanation of permit changes

Indicator Monitoring

- New Category of Monitoring Introduced to the RIPDES MSGP.
- Bacteria and Copper are difficult to eliminate completely.
- Will allow facilities to collect data, track trends, and further inform corrective action implementation, and SWMP revisions.
- Enterococcus and Copper
 - 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).
- Copper

Applies to the following industrial sectors based on DMR data collected from the 2015 EPA MSGP:

 - Sector M – Automobile Salvage Yards
 - Sector Q – Water Transportation
 - Sector R – Ship and Boat Building and Repair Yards
 - Sector AA – Fabricated Metal Products

Benchmark Monitoring

- Oil & Grease

Oil & Grease BMs have been included for those industrial sectors that have high potential to contribute Oil & Grease to stormwater discharges:

 - 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

- Polychlorinated Biphenyls (PCBs)
 - PCB BMs will now be applicable to Sector N – Scrap Recycling and Waste Recycling facilities engaged in the processing of construction and demolition (C&D) debris. PCBs are a contaminant in building materials per EPA.

- Aluminum, Lead, Zinc
 - These three metals will now be formalized as BM parameters for 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.

- Antimony
 - The BM value for Antimony is being reduced from 0.64 mg/L to 0.45 mg/L to be consistent with the current RI Acute WQ criteria for Antimony. This affects Industrial Subsector G2 (Metal Mining) only.

- Cyanide
 - Under the 2019 MSGP, facilities regulated under Sector K were required to meet a Cyanide benchmark of 0.001 mg/L if stormwater discharged to saltwater bodies. This benchmark value has been increased to 0.005 mg/L in Table VIII.K-1 of the 2024 MSGP. This change is proposed because the minimum detection limit for Cyanide is 0.005 mg/l which is greater than the EPA benchmark value of 0.001 mg/L. Therefore, sampling results at which an exceedance determination will be based is the Minimum Detection Limit of 0.005 mg/L. This value may be reduced by permit modification as more sensitive test methods are approved by EPA and the State.

- Magnesium and Iron
 - BMs for Magnesium and Iron are being eliminated due to a lack of documented toxicity per the 2019 NRC Study, to be consistent with the 2021 EPA MSGP, and since there is no RI Acute WQ Criteria for these parameters.
 - The removal of Magnesium applies to Sector K – Hazardous Waste Treatment, Storage, or Disposal Facilities
 - The removal of Iron applies to Subsectors C1, C2, E2, F2, G2, H1, L2, M1, N1, O1, Q1, R1 and AA1.

- Enhancements to Benchmark Monitoring Requirements
 - If <4 samples were collected for any one parameter in the year, Semi-Annual BM monitoring must continue.
 - If <4 BM samples were collected for any one parameter in the year and the average of the remaining sample results in a mathematical certainty that the benchmark value would be exceeded – Corrective Actions will be triggered.

- These requirements eliminate the incentive to collect less than the 4 required BM samples for each parameter.

Corrective Action Requirements

- Corrective Action Reports will be required to be uploaded with the Annual Report in CDX
- Corrective Action Reports must document any corrective actions that were implemented over the past year or corrective actions that are planned for the following year.
- Any BMPs that were proposed or implemented under the 2019 MSGP must be installed or maintained under the 2024 MSGP.

Allowable Non-Stormwater Discharges

- Building Washdown/Power Wash Water must be filtered, detained, or settled to remove solids prior to discharge.
- Pavement Wash Water (without detergents or hazardous cleaning products) has been added to the list of Allowable Non-Stormwater Discharges.

Minimizing Stormwater Impacts from Major Storm Events

- Determine site risk based on facility location (i.e., BFE) using online mapping tool
- Develop strategies to minimize pollution potential during major storm events

Per- and Polyfluoroalkyl Substances (PFAS) Storage and Release Requirements

- Language modeled after EPA's Factsheet "2023 Pollution Prevention Strategies for Industrial PFAS Discharges" and Utah's 2024 MSGP
- Requires site operators to evaluate whether the facility uses or has historically used any products containing PFAS, identify all PFAS containing materials per Part V.F.4. of the permit, and to implement PFAS BMPs and pollution prevention strategies
- Requires site operators to identify PFAS containing materials in the SWMP along with an evaluation as to whether or not PFAS alternatives are available
- These requirements apply to all industrial sectors.

Modification of Antecedent Dry Period

- Antecedent dry period changed from 72 hours (3 days) to 48 hours (2 days) to provide permittees with additional opportunities to sample and more flexibility to comply with quarterly visual assessment and monitoring requirements

Miscellaneous Enhancements

- Clarifying language added that specifies monitoring must be conducted during storm events even if outside of normal business hours.
- Removal of Automatic Permit Transfer Option
- SWMPs must be uploaded as part of the NOI, weblinks are no longer an option.
- SWMP updates must be submitted using NeT via a “Change NOI”
- Records must be maintained for five years (previously 3 years)
- NAICS codes must be provided on NOI
- Clarifying language added that states a No Discharge Certification (NDC) is not a mandatory requirement, and it is intended to help facilities determine and document claims of No Discharge