

**RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT**

**2019 RIPDES MULTI-SECTOR GENERAL PERMIT (MSGP)**



December 2018

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# RIPDES MULTI-SECTOR GENERAL PERMIT (MSGP)

- Re-Issuance Schedule
- Permit Development
- Proposed Changes
- NPDES e-Reporting



# MULTI-SECTOR GENERAL PERMIT (MSGP) RE-ISSUANCE SCHEDULE

- 2013 MSGP Expired August 14, 2018
- Public Notice Draft MSGP December 3, 2018
- Public Comment December 3, 2018 – January 11, 2019
- Informational Workshops:  
December 12 and December 18, 2018
- Public Hearing:  
January 10, 2019
- Continuance of 2013 permit until new permit is issued



# MULTI-SECTOR GENERAL PERMIT (MSGP) PERMIT REQUIREMENTS DEVELOPMENT

- EPA'S 2015 MSGP – 2015 Waterkeeper Alliance Petition for review/appeal of EPA's 2015 MSGP: Evaluate additional monitoring, use of numeric retention standards, escalating Corrective Actions associated with benchmarks exceedances
- Comparison of Permits: EPA's 2015 MSGP, California's ISGP, Washington State's ISGP, Connecticut's IGP





# MSGP PROPOSED CHANGES: REGISTRATIONS FOR NO PERMIT NEEDED FACILITIES

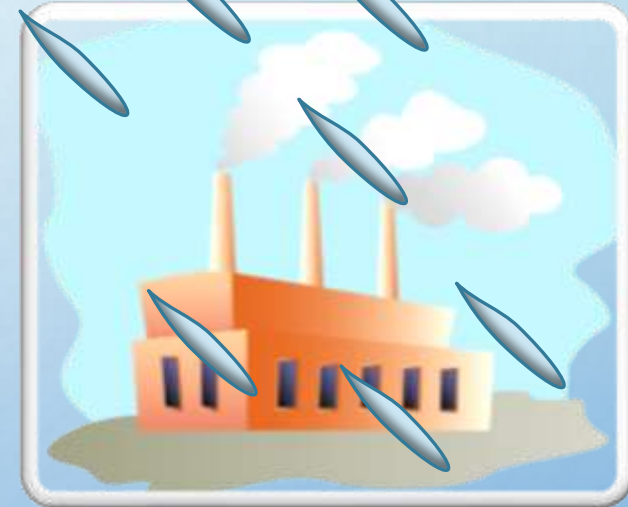
## 2013 PERMIT:

*NO EXPOSURE AND NO DISCHARGE NOT INCLUDED*

## PROPOSED PERMIT:

*REQUIRES CERTIFICATION OF:*

- *NO EXPOSURE (RE-CERTIFICATION REQUIREMENT 1 / 5 YEARS)*
- *NO DISCHARGE FACILITIES (CSO DISCHARGES AND NO POINT SOURCE)*



# MSGP PROPOSED CHANGES: ALLOWABLE NON-STORMWATER DISCHARGES

## 2013 PERMIT:

- EXTERNAL BUILDING WASHDOWN, WASHING OF VEHICLES AND WASHING OF MARINE VESSELS THAT DO NOT USE DETERGENTS
- WATER SPRAYED FOR DUST CONTROL NOT ALLOWED

## PROPOSED DRAFT:

- ADDED DISCHARGES OF WATER SPRAYED FOR DUST CONTROL
- ADDED CLARIFYING LANGUAGE FOR HAZARDOUS CLEANING PRODUCTS. NO DETERGENTS OR HAZ CLEANING PRODUCTS USED (E.G., BLEACH, HF, HCL, NAOH, NONYLPHENOLS)



# MSGP PROPOSED CHANGES: BENCHMARKS MONITORING

## **2013 PERMIT:**

- BENCHMARKS MONITORING NOT REQUIRED FOR SOME SECTORS
- FACILITIES WITH BENCHMARKS MONITORING
  - FREQUENCY: SEMI-ANNUAL

## **PROPOSED DRAFT:**

- MONITORING OF TSS, AND OIL AND GREASE APPLICABLE TO ALL SECTORS
- FREQUENCY: INCREASED TO 4 TIMES PER YEAR (2X JAN-JUN, 2X JUL DEC, ONE MONTH MINIMUM TIME BETWEEN SAMPLING EVENTS)





# MSGP PROPOSED CHANGES: CORRECTIVE ACTIONS

## 2013 PERMIT:

*AVERAGE OF FOUR (4) BM MONITORING SAMPLES EXCEEDS BM CONCENTRATION: REVIEW SELECTION, DESIGN, INSTALLATION, AND IMPLEMENTATION OF CONTROL MEASURES TO DETERMINE IF MODIFICATIONS ARE NECESSARY*

## PROPOSED DRAFT:

*AVERAGE OF FOUR (4) BM MONITORING SAMPLES EXCEEDS BM CONCENTRATION REQUIRES SERIES OF ESCALATING RESPONSES THAT PERMITTEES MUST MAKE*





## 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.

## 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.

Average of 4 consecutive Samples > BM?

YES

Is exceedance solely attributable to natural background?

NO

NO

YES

- Submits to DEM rationale for attributable to background for the parameter
- BM Monitoring for the parameter reduced to once/year and no corrective actions necessary

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

# MSGP PROPOSED CHANGES: IMPAIRED WATERS MONITORING

## 2013 PERMIT:

*ANNUAL (1 X/YEAR) MONITORING FOR DISCHARGES TO  
IMPAIRED WATERS*

## PROPOSED DRAFT:

*INCREASED FREQUENCY FROM ANNUAL TO 4 TIMES PER YEAR  
(2X JAN-JUN, 2X JUL DEC)*



# MSGP PROPOSED CHANGES: IMPAIRED WATERS MONITORING

## 2013 PERMIT:

NO WQBELS INCLUDED IN THE PERMIT

## PROPOSED DRAFT:

WQBELS FOR DISCHARGES TO 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).





# MSGP PROPOSED CHANGES: INSPECTIONS

## 2013 PERMIT:

- QUARTERLY ROUTINE FACILITY INSPECTIONS
- ANNUAL COMPREHENSIVE SITE EVALUATION
- QUARTERLY STORMWATER VISUAL ASSESSMENT

## PROPOSED DRAFT:

- CONSOLIDATED QUARTERLY ROUTINE FACILITY INSPECTIONS AND ANNUAL COMPREHENSIVE SITE EVALUATION
- QUARTERLY STORMWATER VISUAL ASSESSMENT



# MSGP PROPOSED CHANGES: SECTOR SPECIFIC (O AND S)

## CURRENT PERMIT:

- NO EFFLUENT GUIDELINE LIMITATIONS FOR SECTOR S

## PROPOSED DRAFT:

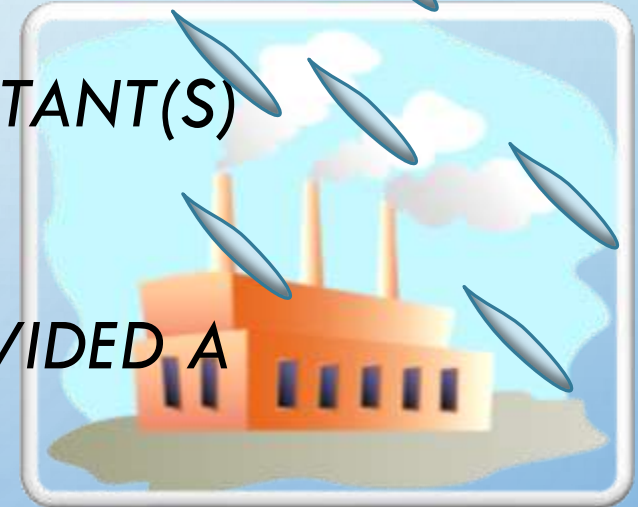
- EFFLUENT GUIDELINE LIMITATIONS FOR SECTOR S
- SECTOR O GEOTHERMAL WELLS DO NOT MEET REGULATED SIC



# MSGP PROPOSED CHANGES: NOTICE OF INTENT

## PROPOSED DRAFT:

- CONTAINS PER OUTFALL SPECIFIC DETAILS: LATITUDE-LONGITUDE, RECEIVING WATERS, IMPAIRMENTS, POLLUTANT(S) CAUSING IMPAIRMENTS, APPLICABLE SECTORS
- PROVIDE URL FOR SWMP AVAILABILITY, IF NO URL PROVIDED A COPY OF THE SWMP MUST BE UPLOADED





# ELECTRONIC APPLICATION AND REPORTING

- NPDES Electronic Reporting:

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

- Discharge Monitoring Reports (DMRS) (CURRENTLY AVAILABLE)
- Notices Of Intent To Discharge In Compliance With A General Permit (COMING SOON)
- Other Specified Program Reports (COMING SOON)

# QUESTIONS?

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