

Texas Pollutant Discharge Elimination System Stormwater Multi-Sector General Permit

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(STEP)

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Renewal of TPDES stormwater Multi-Sector General Permit TXR050000



TXR050000 Renewal

- Existing permit:
 - effective August 14, 2011
 - expires August 14, 2016
- Renewal process began October 2014
- Benchmark Monitoring Analysis began October 2014
- Internal input requested from TCEQ Regional offices, SBLGA, and Industrial Wastewater Team
- Stakeholder meeting held January 8, 2015
- Stakeholder comment period ended January 23, 2015
- Preparing draft permit based on internal comments and stakeholder comments received
- Draft permit expected release for public review – January 2016
- 30 day public comment period following release



What the Permit Covers?

- Facilities with “stormwater discharges associated with industrial activity,” defined in 40 CFR §122.26(b)(14)
- Facility (i.e., “primary”) standard industrial classification (SIC) codes
- Additional narrative categories:
 - landfills (LF), treatment works (TW), steam electric power plants (SE), and hazardous waste treatment, storage and disposal facilities (HZ)
- Discharges of stormwater regulated under federal categorical guidelines, 40 CFR §§400-474



Who needs a permit?

- Operators of facilities with regulated discharges
- Includes the following:
 - Military bases and other federal facilities
 - Municipally-operated facilities
 - Publicly-owned facilities
 - Colocated facilities
 - Colocated activities
 - Additional facilities designated by TCEQ




Proposed Changes To Existing Permit

- SIC code and Sector format changes
- Inclusion of Airport De-icing Effluent Limitations Guidelines
- Clarifying BMR waiver reporting requirements
- **Proposed BMR limits**
- Permit language clarifications
- Adding Definitions
- Impaired Receiving Waters and Total Maximum Daily Load (TMDL) Requirements
 - Expanding the language in this section
 - comply with controls required in the TMDL or Implementation Plan (IP) plan.
 - Including Texas Integrated Report Index of Water Quality Standards



MSGP Benchmarks

- What are they?
 - Benchmarks characterize the discharge from regulated activities
 - A guideline to help assess the need for or effectiveness of best management practices (BMPs)
 - Benchmarks Monitoring Requirements (BMR) sampling data sent to TCEQ



Report of Benchmark Monitoring Data for Stormwater Discharges Associated with Industrial Activity under the TPDES Multi-Sector General Permit (TXR050000)

Permit No. TXR05[][][][], SIC code: [][][][] or Industrial Activity Code: [][], Sector: []

Parameter	Benchmark Level (mg/l)	1st Period Result (Jan–Jun)	2nd Period Result (Jul–Dec)	Annual Average Result (mg/l)	<i>Check (T) if Annual Average Exceeds Benchmark Level</i>

- Who do they impact?
 - Required in certain Sectors based on SIC Codes
 - Example - Copper and Arsenic for Sector A – Timber, SIC Code 2491, Wood Preserving



MSGP Benchmarks

- What if a benchmark value is higher than the MSGP values?
 - **Not a violation** – NOT a numeric effluent limitation
 - Not eligible for waiver from benchmark sampling
 - Adjust BMPs and update stormwater pollution prevention plan (SWP3)
 - Consider if due to natural background concentrations

Table 3 List of Benchmark Parameters and Values

Pollutant	Benchmark value (mg/L)
Aluminum, total	1.2
Ammonia-nitrogen	2.5
Antimony, total	0.636
Arsenic, total	0.010**
Beryllium, total	0.13



Benchmark Value Adjustment History

- Why adjust benchmarks?

Permit and Renewal Dates	Number of Pollutants	Number of Adjusted Benchmark Values
1995 – EPA	25	N/A
2001 - TX	25	0
2006	25	10 - ↑7, ↓3
2011	25	10 - ↑2, ↓8
<i>2016 Proposed</i>	<i>25</i>	<i>3 - ↑0, ↓3</i>



Benchmark Value Adjustment History

↑ Increasing the Benchmark

- Raised to be at or near the median
- Raised to at or near maximum value

↓ Decreasing the Benchmark

- Lowered to at or near the median
- Lowered to at or near maximum level



MSGP Benchmark Analysis

STEPS

1. Review past processes for analyzing benchmarks
 - Benchmarks are typically near median values or higher
 - Benchmarks are both lowered/increased at pollutant level
 - Total Suspended Solids is an exception – 50 and 100 mg/L
 - The data from permittees – average annual results
 - Year 1 – sent to TCEQ
 - Year 2 – sent to TCEQ
 - Year 3 – may waiver out – only send to TCEQ if over benchmark
 - Year 4 – may waiver out – only send to TCEQ if over benchmark



MSGP Benchmark Analysis

STEPS

2. Descriptive statistics (median, min/max, range, distribution)
 - Mean values are greater than median values
 - Outliers (extreme high values) are present and skew data
3. Analyze and recommend proposed changes
 - Comparison of data over time – 2011 vs 2016
 - Graph data

Pollutant	2011	2016	Median-Benchmark
Type	Benchmark	Median	% Diff (in 2016 from 2011)
Aluminum	1.2	1.16	-3.3
Ammonia N	2.5	0.25	-90.0
Antimony	0.636	no data = 0.636	0.0
Arsenic	0.01**	0.01	0.0
Beryllium, total	0.13	no data = 0.13	0.0
BOD	30	6.12	-79.6
Cadmium	.001**	0.001	0.0

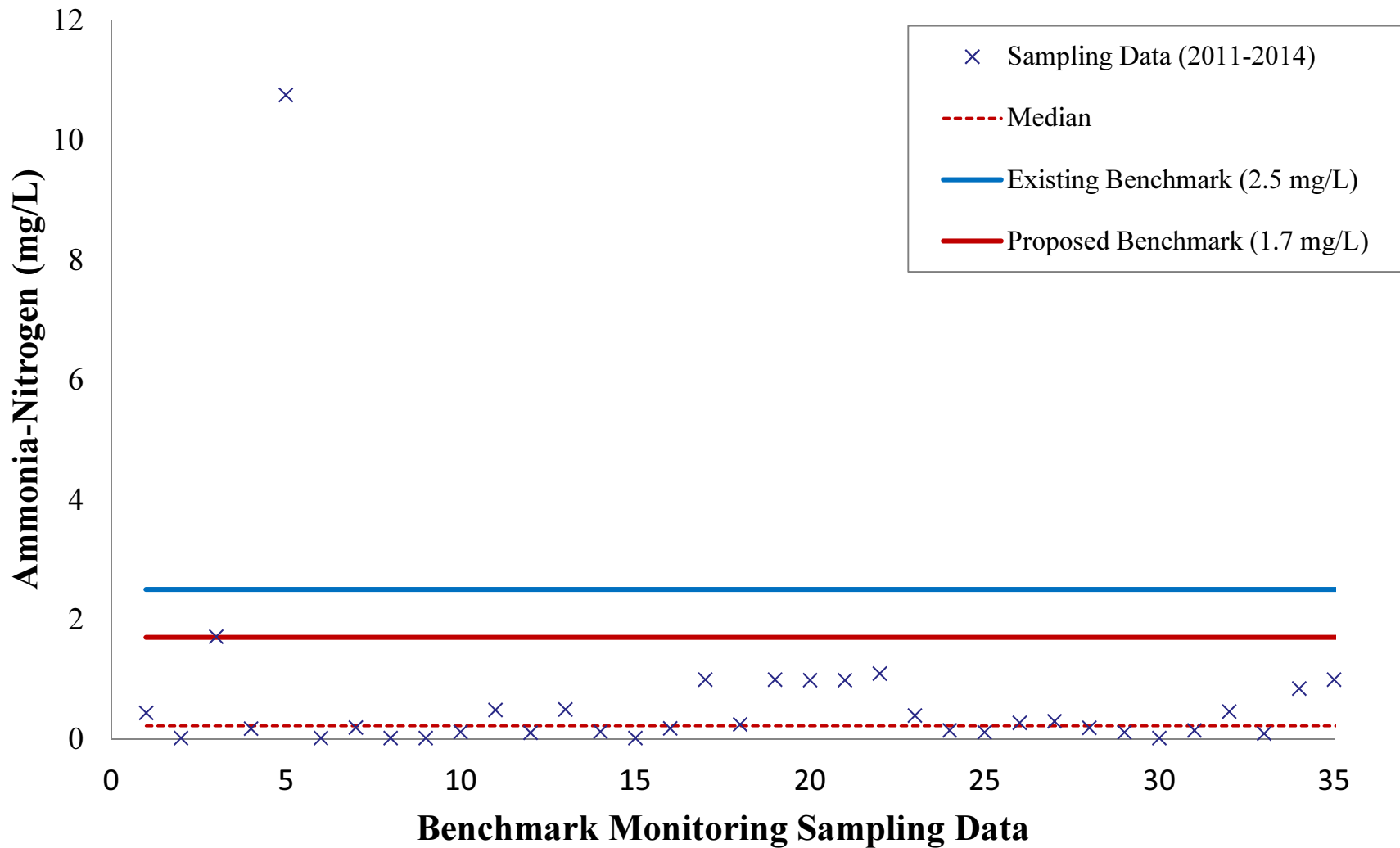


MSGP Benchmark Analysis

Sector K: Hazardous Waste Storage Facilities

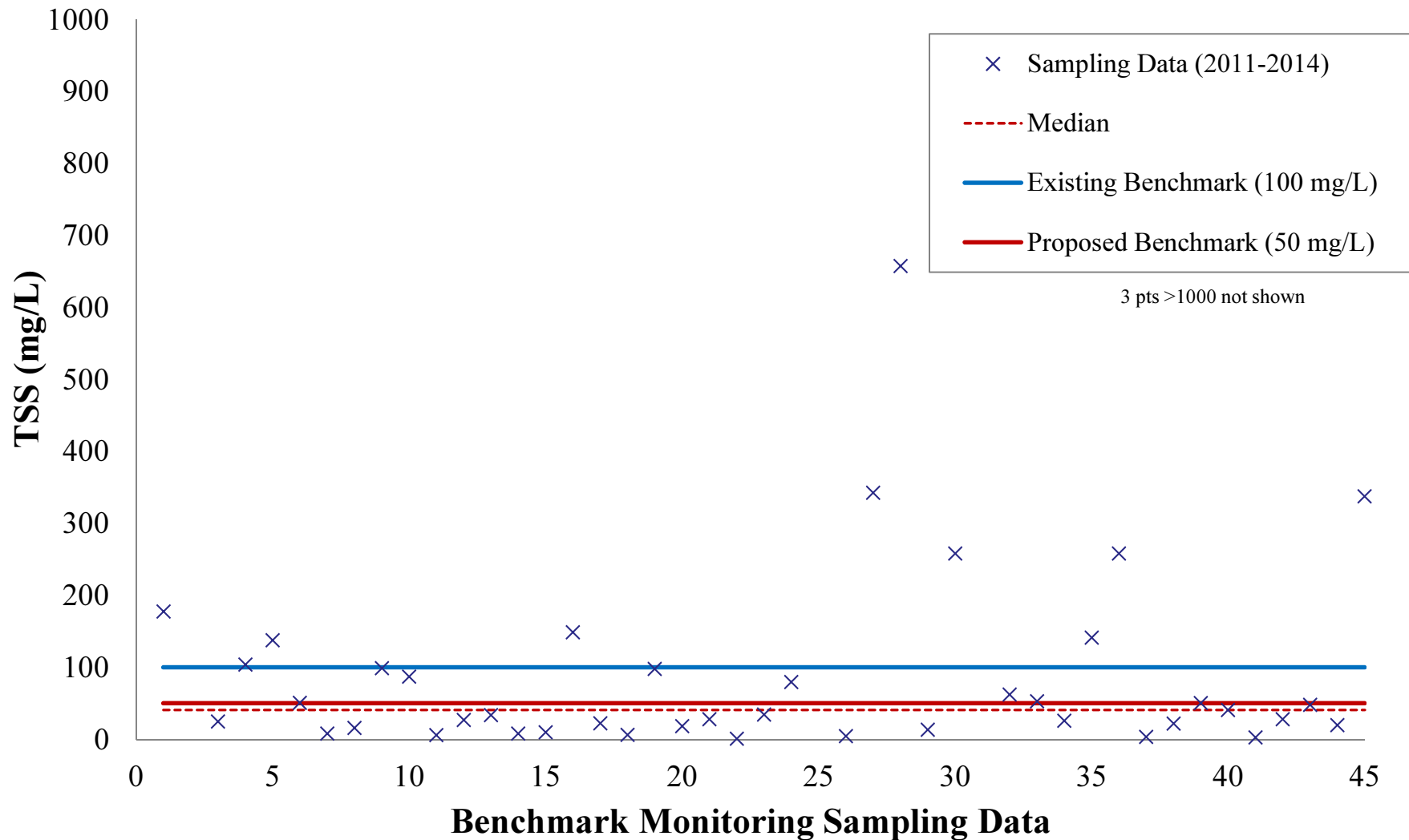
Hazardous Waste Treatment, Storage, and Disposal / Activity Code HZ

Ammonia-Nitrogen (mg/L) Benchmark Analysis



MSGP Benchmark Analysis

Sector F: Primary Metals Facilities Iron and Steel Foundries / SIC Codes 3321-3325 Total Suspended Solids, TSS (mg/L) Benchmark Analysis



Summary of Proposed Benchmark Changes

- Ammonia-Nitrogen lowered from 2.5 to 1.7 mg/L for the following (2 of 2):
 - Sector K (Activity Code HZ)
 - Sector S (SIC Codes 4512-4581)
- Biochemical Oxygen Demand (BOD5) lowered from 30 to 20 mg/L for the following (1 or 1):
 - Sector T (Activity Code TW)
- Total Suspended Solids (TSS) lowered from 100 to 50 mg/L for the following (4 of 12):
 - Sector A (SIC Codes 2426-2499)
 - Sector C (SIC Codes 2873-2879)
 - Sector F (SIC Codes 3321-3325)
 - Sector H (SIC Codes 1221-1241)



EPA's National MSGP

- Expired Sept. 29, 2013
- On September 27, 2013, EPA published in the *Federal Register* the proposed 2013 MSGP.
- Extended public comment period to December 2013
- Confirmed Dec. 23, the White House Office of Management and Budget has begun to review the proposed MSGP



E-Permitting

- EPA National Electronic Reporting Rule:
 - Rule expected to be finalized by EPA at the end of 2015
- TCEQ 2016 MSGP Renewal
 - Moving to 100% electronic submittal
 - 60% of MSGP permitting universe currently submitting electronically
- Comments or Questions?



Web Links

Stormwater Home Page:

http://www.tceq.texas.gov/permitting/stormwater/sw_permits.html

SBLGA Assistance Tools webpage for MSGP:

<http://www.tceq.texas.gov/assistance/water/stormwater/sw-industrial.html>

Proposed EPA MSGP:

<http://water.epa.gov/polwaste/npdes/stormwater/EPA-Multi-Sector-General-Permit-MSGP.cfm>



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