



CORNERSTONE
Environmental Group, LLC

The New Arizona Pollutant Discharge Elimination System (AZPDES) Non-Mining General Permit for Storm Water Discharges. What is it and what do you need to do to comply with it?

Background Information

- The Clean Water Act establishes a comprehensive program “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” The National Pollutant Discharge Elimination System (NPDES) was promulgated to regulate storm water discharges which could impact the Nation’s water. As part of the NPDES program, EPA issued the Multi-Sector General Permit (MSGP) under 40 CFR 122 to regulate storm water discharges. As part of the MSGP, EPA requires individual Storm Water Pollution Prevention Plans for sites that could discharge pollutants to the Nation’s waters.
- Arizona received authorization from EPA to administer the NPDES program within the State of Arizona except for sites on Indian Country Lands in December 2002. EPA reissued the NPDES permit in September 2008. Arizona then prepared a draft permit (Arizona Pollutant Discharge Elimination System – AZPDES) based on the EPA permit with Arizona specific aspects in 2009, which it finalized on December 20, 2010.
- The AZPDES permit requires a site seeking coverage under the AZPDES general permit to submit a Notice of Intent (NOI) to ADEQ and formulate a Storm Water Pollution Prevention Plan (SWPPP) for the site. The purpose of the SWPPP is to identify potential pollution sources and practices which minimize and control pollutants in storm water runoff.

Aspects of the AZPDES

- Notice of Intent (NOI) – Facilities must submit a NOI to obtain coverage under the AZPDES Multi Sector General Permit.
 - NOI includes Facility Information including Business name, contact information, address, latitude & longitude (of outfall(s)), previous permit information, Standard Industrial Classification or Activity Code, Discharge Information including closest water, if the receiving water is classified as impaired or outstanding Arizona water, and what pollutant(s) are causing the impairment.
- No Exposure Certification – Certification that the site does not need coverage under the AZPDES program due to the condition that all industrial materials and activities are protected by storm-resistant shelters.
 - No Exposure Certification includes contact information, site information, and an exposure checklist.
- Notice of Termination (NOT) – Facility must submit a NOT when it is no longer authorized to discharge storm water associated with industrial activities. A Notice of Termination needs to be submitted if:
 - Operational control of the facility has been transferred to another owner or operator.
 - No storm water discharges associated with industrial activity subject to AZPDES program.
 - Facility is classified as a Sector G (Metal Mining (Ore Mining and Dressing) Facilities) or Sector J (Mineral Mining and Dressing Facilities) facility which are covered under the mining general permit.
 - Coverage has been obtained under an alternative AZPDES permit (individual permit).
 - A No Exposure Certification has been received.
- Storm Water Pollution Prevention Plan (SWPPP) – Facility must develop and implement the SWPPP prior to discharging storm water from the facility. For Existing Dischargers, facilities must update their existing SWPPP and apply for coverage by May 31, 2011. New Dischargers must develop SWPPP and submit NOI at least 32 business days prior to discharge.

Aspects of the SWPPP

- General Site Information including
 - Location Information
 - Site History
 - Current Site Use including materials used onsite, impaired waters, and other information
- Permit Duration
- Site Location Map
- Pollution Prevention Team
 - Employees responsible for implementing the SWPPP
 - Employee Training
- Site Plan and Drainage Information
- Potential Pollutant Sources
- Spill Prevention and Response Procedures
- Control Measures (Best Management Practices)
- Storm Water Monitoring
- Inspection/Reporting Requirements
- Notice of Intent
- Quarterly Inspections and Visual Storm Water Monitoring
- Annual Comprehensive Site Compliance Evaluation

General Site Information

- Lists general site information including address, Latitude and Longitude, site history, current use, site description, site drainage, impaired or Outstanding Arizona Waters information

Permit Duration

- Lists when the general permit expires (Midnight January 31, 2016)

Site Location Map

- Location Map showing the site and the surrounding area out to 1 mile including any local water features

Pollution Prevention Team

- List of employees responsible for implementing the SWPPP
- Employees shall receive annual training on the goals, components, and how to implement the SWPPP
- Training topics may include as applicable: used oil and spent solvent management; fueling procedures; general good housekeeping practices; proper painting procedures; used battery management, proper vehicle washing practices, dry well maintenance, material storage practices, etc.

Spill Prevention and Response Procedures

- List of any significant leaks or spills during the past 3 years. Information on how to respond in case of a spill including contact list for the site.

Site Plan and Drainage Information

- Map showing the site including Stormwater flow directions, outfalls, Control Measures, Potential Pollutant Sources, etc.

Control Measures (Best Management Practices)

- Table of Control Measures – Table includes Control Measures for each Potential Pollutant Sources listed. Control Measures consist of structures, equipment and/or practices that reduce or eliminate potential leaks, spills, or other means of contamination from impacting or leaving the site.

Storm Water Monitoring

- Visual Storm Water Monitoring
 - Perform visual storm water monitoring
 - Grab sample within first 30 minutes of discharge
 - Document color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and any other signs of pollution

Non-Storm Water Discharge Certification

- Certify non-storm water discharges as part of the Annual Comprehensive Site Compliance Evaluation

Inspection/Reporting Requirements

Quarterly and Annual Inspections shall be made of the site as included in Appendices.

- Inactive and Unstaffed sites are not required to perform routine inspections if there are no industrial materials or activities exposed to precipitation.
- If no storm event results in a discharge from the facility during a wet season, then must document that no discharge could be collected.
- When adverse weather conditions (local flooding, high winds, electrical storms, etc) prevent collection of sample, then must document that adverse conditions prevented collection of sample.
- If there are two or more outfalls that discharge substantially identical pollutants, the site may conduct visual assessments at just one of the outfalls and report that result for the identical outfall(s).

Appendices

- Include copy of AZPDES Permit.
- Include copy of completed Notice of Intent
- **Routine Inspections and Visual Storm Water Monitoring**
 - Complete routine facility inspections
 - Visual inspection of storm water discharge from outfalls during a representative storm event
 - Inspections are only required to be made during normal working hours and within the first 30 minutes (or as soon as possible, but not to exceed 1 hour) of discharge
 - If no storm event resulted in runoff during the monitoring quarter, you must document in your monitoring records that no runoff occurred and have an authorized representative sign the documentation
 - Sites must perform and document a visual examination of a storm water discharge from each outfall twice during each wet season. The Summer wet season is defined as between June 1 – October 31. The Winter wet season is defined as between November 1 – May 31. Where practicable, the same person should carry out the collection and examination of discharges for the entire permit term.
 - The report must include the examination date and time, examination personnel, the nature of the discharge (runoff or snow melt), visual quality of the discharge (including observations of color, odor (e.g., none, earthy, petroleum), clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of storm water pollution), and probable sources of any observed storm water contamination. A water sample from the outfall should be collected in a clear glass container and examined for the listed parameters.
- **Annual Comprehensive Site Compliance Evaluation**
 - Complete Annual Comprehensive Site Compliance Evaluation
 - The annual inspection consists of 1) updating the Pollution Prevention Team List and documenting employee training, 2) revising the inventory of significant materials, 3) completing the non-storm water discharge certification, and 4) update site plans. The annual inspection includes checking the sediment and erosion control measures and ensuring that they are operating properly
 - Revise SWPPP - the description of potential pollutant sources and pollution prevention measures identified in the plan shall be revised as appropriate within two weeks of such inspections.

Aspects of Implementing SWPPP

- Review SWPPP with emphasis on Control Measures (BMPs)
- Good housekeeping practices
- Store oil and other products that could cause water or soil contamination (i.e. leaking hydraulic cylinders, etc) in a designated area that has containment to keep any spills from leaving the site.
- Use drip pans for leaking vehicles
- Observe all BMPs especially those concerning fueling and oil storage
- Perform maintenance, vehicle cleaning, in designated areas
- Properly maintain vehicles and equipment
- Regularly observe storage tanks, oil-water separators, painting areas, maintenance areas, and any other area where contaminants may be present for signs of leakage or potential leakage

Differences Between AZPDES and NPDES Permits

- Endangered Species Act, National Historic Places Act, and National Environmental Policy Acts demonstrations not required in AZPDES permit. EPA still retains authority for compliance with these programs.
- Discharges to Impaired Waters and Outstanding Arizona Waters. If the facility discharge will be within 2.5 miles of an Impaired or Outstanding waters, then the site must document that the facility discharge will not cause or contribute to the pollutants causing the impairment or degrade the existing water. The facility must also submit their SWPPP to ADEQ if it is within the 2.5 miles of the Impaired or Outstanding waters. Site must also submit an annual report.
- Visual assessments during wet seasons.
- Include information on Drywells in SWPPP.
- If discharging to Ephemeral water, do not need to monitor for TSS and Turbidity. Only need to monitor other parameters once per wet season (if have to perform monitoring).

Questions?