

ENVIRONMENTAL PROTECTION DIVISION

2022 Industrial Stormwater General Permit

Veronica Craw
Nonpoint Source Program Manager

October 23, 2024



INDUSTRIAL STORMWATER GENERAL PERMIT

National Pollutant Discharge Elimination System (NPDES)
General Permit No. GAR050000

Stormwater Discharges Associated with Industrial Activity

- General Permits cover multiple dischargers with similar operations and types of discharge
- Referred to as the "2022 IGP"
- Effective: June 1, 2022
- Expires: May 31, 2027





Hartsfield-Jackson Atlanta International Airport



MONITORING: INDICATOR MONITORING

Indicator monitoring is used to generally evaluate site conditions and effectiveness of control measures.

- Started January 2023 (allowed for transition period)
- Conducted annually
- Report ONLY
- TSS, COD, pH ALL Sectors
- PAH CERTAIN Sectors
- NOI universe: ~2,000
- Est. facilities new to monitoring: 660





MONITORING: BENCHMARK MONITORING

An exceedance of a benchmark is **not a violation.** Benchmark monitoring is used to minimize the discharge of pollutants and specifically to determine the overall effectiveness of control measures.

- Conducted annually
- If do not exceed, permittee does not need to sample again for that year
- If exceed, permittee must make modifications and sample quarterly until the benchmark is met



MONITORING: CONTINUED BENCHMARK EXCEEDANCE

- Review the SWPPP and implement additional pollution prevention/good housekeeping control measures, beyond what was done in the initial, or...
- Make a determination that no further pollutant reductions are technologically available and economically practicable and achievable

Still exceeding 2 years later?

Install structural source controls and/or treatment controls (permanent cover, secondary containment, hydrodynamic seperators, etc.)



REPORTING

Reporting monitoring data is required by the permit. The SWPPP should have guidelines on how to submit data to EPD.

Annual Reports

- Due by January 31, for the previous year.
- These reports contain only qualitative data.
- These are submitted electronically via GEOS.

As of 2023, all quantitative data is reported using NetDMR. 6-month phase in period.

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Old AR Form



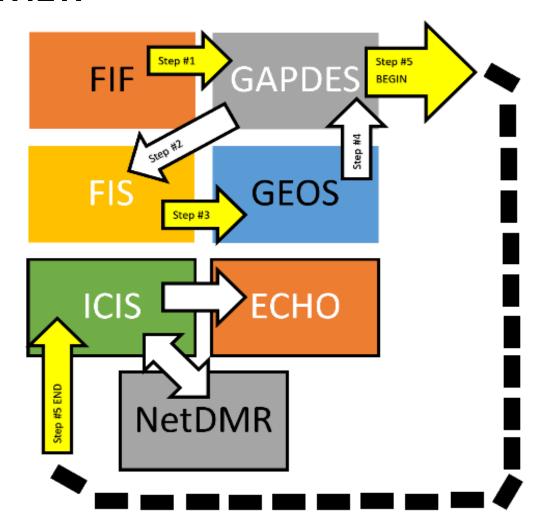
- New Requirement quarterly submittal of monitoring data using NetDMR
 - Effective with the reporting period starting on January 1, 2023.
- ❖ Submission Deadline for Indicator, Benchmark, Effluent Limitation and Impaired Waters Monitoring Data
 - DMRs are due on the 45th day following the reporting period

Quarterly reporting of monitoring data required, even if sample not taken



DATA FLOW OVERVIEW

- Black font = data from permittees.
- Yellow arrows = manual data entry component.
- Boxes with an outline are Federal databases.
- Anywhere there is an arrow, there is a possible data flow error.
- GEOS and ECHO contain publicly available data.





KNOWN DATA ISSUES – ACTIVE WORKLIST EPD

- Alert vs. Enforceable Parameters Erroneous Violations in ECHO
- Annual Report Coding Issue Erroneous Violations in ECHO
- ❖Initial Monitoring Date & DMR Due Date Incorrect
- Limit Sets/Limits Incorrect and/or Missing some did not flow to ICIS and some did flow onward to NetDMR
 - EVERY facility was assigned a material storage pile



KNOWN DATA ISSUES - PERMITTEES

- DMRs Non-Receipt, Late, or Incomplete Submittals
- **QA/QC**
- No Signatory Role for DMR Submittals
- ❖ GEOS Submittal Attempts on Terminated Sites (Another reason not to share RO log-on information!)



Dunwoody, GA



- Since January of 2024, we have received 2,274 Annual Reports
 - 108 are from years prior to 2023
- ❖ We have been contacted by several industries who have Annual Report violations in ECHO. Flow issue.
- *EPA has posted a caveat on the ECHO facility search webpage (https://echo.epa.gov/facilities/facility-search/results).



Reporting Yea
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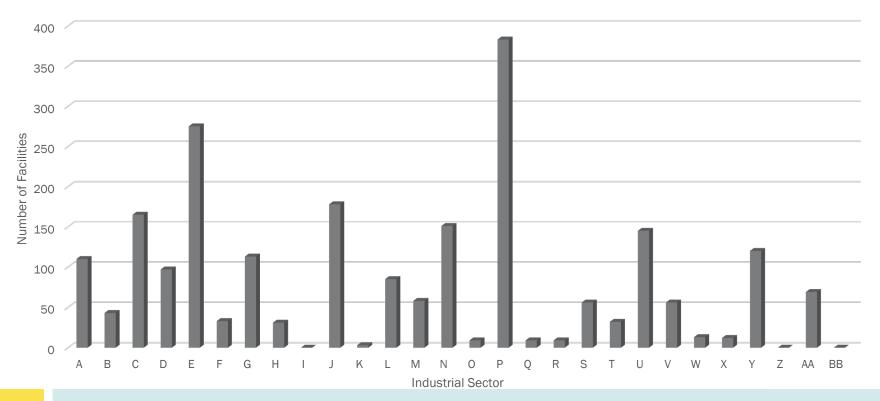


- Since the IGP became effective in June of 2022, we have received 3,773 applications (3,166 NOIs and 607 NEEs)
 - This number includes sites that have since terminated as well as sites that have submitted modifications
- 657 are in review
- 10 are currently being revised by facilities
- *873 have been withdrawn or archived by the RO/facility
- 2,233 have been approved in GEOS



There are currently 2,146 In-Effect NOI sites. EPD has received DMRs from 1,829 so far. That's 85% success!

Industry Type NOI Total





Successfully signed and submitted DMRs by the quarter for 2023:

❖Q1: 1,441

♦Q2: 1,529

❖Q3: 1,633

♦Q4: 1,693

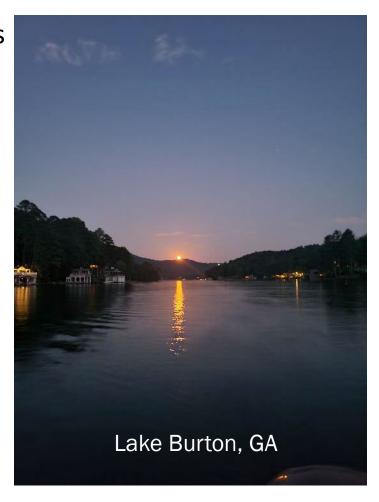
Successfully signed and submitted DMRs by the quarter for 2024:

❖Q1: 1,727

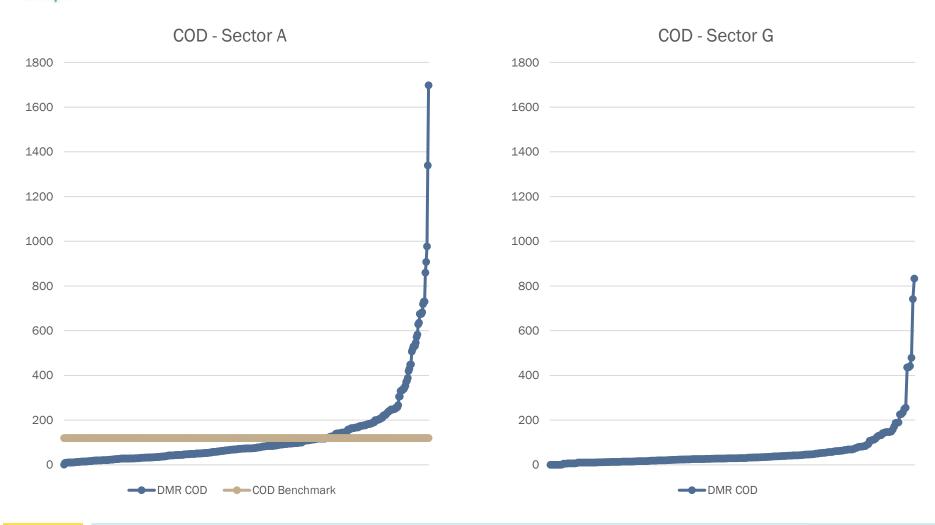
❖Q2: 1,700

❖ Q3: 207 (...due on 11/15/2024)

Q4: 7 (...due on 2/15/2025)



DATA FROM DMRS



Values such as 0 and 1,698 have been reported. Raw sewage has a range of 600 - 900. Some facilities use 0 in place of "below detection" NODI code.

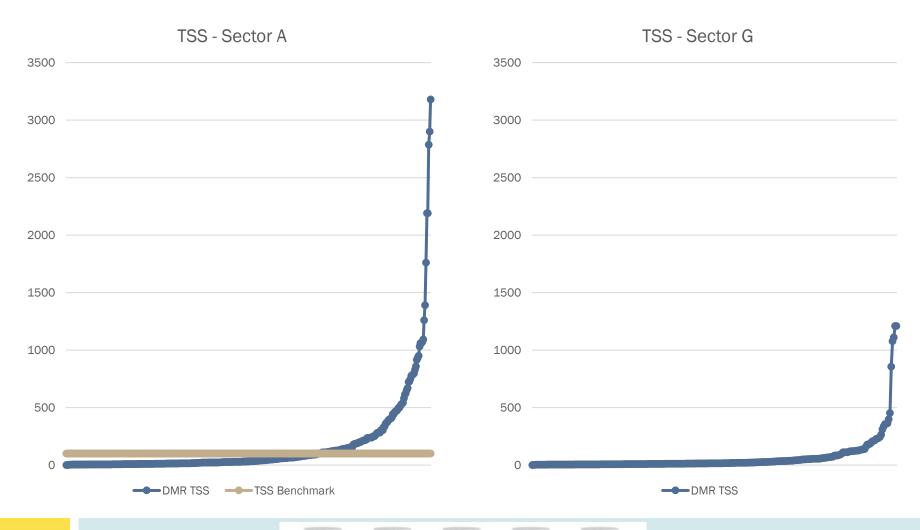
DATA FROM DMRS



Values of 0 (battery acid) and 306 (?!?) have been reported. Those aren't included in these graphs.



DATA FROM DMRS



--> 35 mg/L



IGP WORKING GROUP

IGP Working Group

- Data Subgroup
- Industry Subgroup





GEORGIA ENVIRONMENTAL PROTECTION DIVISION

PERMIT NO. GAR050000 STAKEHOLDER WORKGROUP MEETING

Authorization to Discharge Under the National Pollutant Discharge Elimination System Stormwater Discharges Associated with Industrial Activity

November 18, 2022

The Georgia Environmental Protection Division (EPD) Watershed Protection Branch is initiating bi-annual stakeholder workgroup meetings to review and discuss PERMIT NO. GAROSOMO, hereafter called the IGP. These meetings will provide stakeholders with the opportunity to engage in dialog with EPD staff to discuss the implementation of the 2022 IGP throughout the term of the permit. This first virtual meeting will be focused on proposed corrections, such as typos and omissions, to the 2022 IGP.

In addition to the bi-annual stakeholder workgroup meetings, EPD also intends to conduct focus group meetings to discuss topics of particular relevance to targeted stakeholders. Focus group meeting discussions will be summarized and reported back during the workgroup meetings.

These stakeholder workgroup and focus group meetings will be in addition to, and not in lieu of, any public notices or public hearings associated with the reissuance or modification of the IGP.

First Bi-annual Stakeholder Workgroup Meeting Zoom Meeting Details: November 18, 2022, beginning at 10:00 a.m.

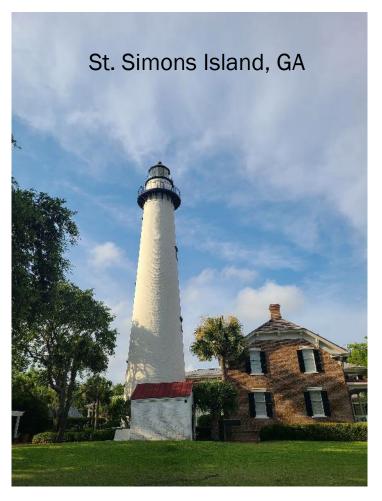
Link to join: https://gaepd.zoom.us/i/97294842335?pwd=VFEyRnpHRHg4UDB3NXFLNXNZOv9KZz09

> Meeting ID: 972 9484 2335 Passcode: 268362

Those joining via computer can use their computer audio, or may also dial-in.

Dial-in number: 1-888-788-0099 (with same Meeting ID as above)





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