Regulatory Background & Determining if Industrial Permit Coverage is Needed

- NPDES General History
- Greenville County NPDES Permit
- Types of Industries Needing Industrial General Permit Coverage
Regulatory Background

• The Clean Water Act
  – 1948 known as The Federal Water Pollution Control Act
  – Reorganized and expanded in 1972
  – Officially called Clean Water Act (CWA) after amendments in 1977
  – Amended in 1987 to include storm water

• Greenville County was listed by the USEPA as a Phase I entity in November 1990

• Greenville County is a Medium MS4 covered under an individual Storm Water permit issued by DHEC
  – One of the Permit requirements is an Industrial Runoff Program
Phase I NPDES Storm Water Program

- Developed by EPA in 1990 in response to 1987 Amendments to the CWA
- Requires NPDES permit coverage for:
  - “medium” and “large” municipal separate storm sewer systems (MS4s) located in incorporated places or counties (such as Greenville County) with populations of 100,000 or more,
  - 11 Categories of industrial activity (40 CFR 122.26 (b) (14)(i)-(xi))
South Carolina Department of Health and Environmental Control (SC DHEC)

- Authorized by the EPA to administer the NPDES program as defined by the Clean Water Act Section 402 (b) and 40 CFR Part 123
- Issues, permits, and regulates storm water for Municipal Separate Storm Sewer Systems (MS4s) and Industrial Facilities
Industrial Storm Water Program

Who should obtain coverage under the Industrial General Permit (IGP) SCR000000?
NPDES General Permit for Storm Water Discharges Associated with Industrial Activities SCR000000

- Excludes construction activity
- Referred to as the Industrial General Permit (IGP) or Multisector IGP
- What is “Storm Water Discharges Associated with Industrial Activity”
  - Per the permit it means “the discharge from any conveyance that is used for collecting and conveying storm water that is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant”
  - Definitions in Appendix A of the general permit
11 Categories of Industrial Activity per 40 CFR 122.26(b)(14) (i)-(xi)
(i) Facilities subject to storm water effluent standards under 40 CFR subchapter N
(ii) Facilities classified by SIC code
(iii) Mineral Industry
(iv) Hazardous Waste
(v) Landfills
(vi) Recycling Facilities
(vii) Steam Electric Plants
(viii) Transportation
(ix) Treatment Works
(x) Construction (Excluded Under this Permit)
(xi) Light Industry
Sectors of Industry Covered Under the SC DHEC IGP (SCR000000)

Sector A: Timber Products
Sector B: Paper and Allied Products
Sector C: Chemicals and Allied Products
Sector D: Asphalt Paving and Roofing Materials and Lubricants
Sector E: Glass, Clay, Cement, Concrete, and Gypsum Products
Sector F: Primary Metals
Sector G: Metal Mining (Ore Mining and Dressing)
Sector H: [Reserved] Coal Mines and Coal Mining Related Facilities
Sector I: [Reserved] Oil and Gas Extraction and Refining
Sectors of Industry Covered Under the SC DHEC IGP (SCR0000000)

Sector J: [Reserved] Mineral Mining and Dressing
Sector K: Hazardous Waste Treatment, Storage, or Disposal Facilities
Sector L: Landfills, Land Application Sites, Open Dumps
Sector M: Automobile Salvage Yards
Sector N: Scrap Recycling Facilities
Sector O: Steam Electric Generating Facilities
Sector P: Land Transportation and Warehousing
Sector Q: Water Transportation
Sector R: Ship and Boat Building and Repairing Yards
Sectors of Industry Covered Under the SC DHEC IGP (SCR000000)

Sector S: Air Transportation Facilities
Sector T: Treatment Works
Sector U: Food and Kindred Products
Sector V: Textile Mills, Apparel, and other Fabric Product Manufacturing; Leather and Leather Products
Sector W: Furniture and Fixtures
Sector X: Printing and Publishing
Sector Y: Rubber, Miscellaneous Plastic Products, and Miscellaneous Manufacturing Industries
Sector Z: Leather Tanning and Finishing
Sectors of Industry Covered Under the SC DHEC IGP (SCR000000)

Sector AA: Fabricated Metal Products
Sector AB: Transportation Equipment, Industrial or Commercial Machinery
Sector AC: Electronic, Electrical, Photographic, and Optical Goods
Sector AD: Non-Classified Facilities *

* Other storm water discharges designated by the Director as needing a permit (see 40 CFR 122.26 (a)(9)(i)(C) & (D)) or any facility discharging storm water associated with industrial activity not described by any of Sectors A-AC.
I think I need to be covered. Now what do I do?

- Industrial General Permit
- Determine your SIC code and IGP sector
- NOI

Required before any industrial activity takes place

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How do I determine what sector my facility would fall under?

- Need to know your Standard Industrial Classification (SIC)
- Sectors are groupings of SIC codes that have similar requirements
- Use OSHA’s website to look up SIC codes: https://www.osha.gov/pls/imis/sicsearch.html
Get started before the inspectors show up!

- General and individual NPDES industrial storm water permits, are available to operators of industrial facilities.
Permitting Process

- The SC DHEC has issued a general permit for use in permitting industrial facilities.
- Some facilities have individual permits, but most of these were issued prior to the Phase I Storm Water Regulations and are no longer valid.
- On a case-by-case basis, individual permits may be required in lieu of granting general permit coverage due to water quality issues.
NPDES Industrial General Permit

- Issued September 1, 2016, effective October 1, 2016
- Expires September 30, 2021
- Permit No: SCR000000
- Issued in accordance with the provisions of the Pollution Control Act (S.C. Code Sections 48-1-10 et seq., 1976)
Industrial General Permit

• Covers all new and existing point source discharges of storm water associated with industrial activity to waters of South Carolina - a NOI is required. Some exceptions - see the permit for specifics.

• Does not authorize storm water discharges associated with industrial activity that are:
  – mixed with non-storm water (some exceptions-see IGP Part 1.1.3)
  – subject to an existing effluent limitation guideline addressing storm water (some exceptions see IGP Table 1-1)
  – subject to existing NPDES individual or general permit; at a facility where an NPDES permit has been terminated or denied - unless specifically granted in writing by SCDHEC
How do I get covered?

• Submit a Notice of Intent (NOI), along with the $75 annual fee to:

  SC Dept. of Health & Environmental Control
  Water Facilities Permitting
  2600 Bull Street
  Columbia, SC 29201

• For More information see the SCDHEC Industrial Website:

• NOI & SWPPP are Required Before Industrial Discharge is Allowed
SCDHEC NOI Form

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NOI

• By filing a NOI, the applicant is certifying that they have prepared a Storm Water Pollution Prevention Plan (SWPPP or SP3) in accordance with the requirements of the General Permit and that the actions required by the SWPPP will be implemented.

Filing a NOI is Only the First Step

- Must have a fully developed SWPPP
- Must follow all non-sector and sector specific requirements, including:
  - Perform inspections – quarterly and annual comprehensive as required by the IGP
  - Sampling of discharges to 303d or TMDL waters
  - Visual assessments of storm water discharge
  - Other sector specific requirements

http://knowyourmeme.com/memes/inspector-gadget-theme-parodies

http://www.envsamp.com/index.php/services
Industrial Program

• For more information review Industrial Permit information available on SCDHEC and/or EPA’s websites
• Contact SCDHEC directly with IGP questions
• Review Industrial Training provided by the Greenville County Land Development Division (LDD) at: https://www.greenvillecounty.org/LandDevelopment/Industrial.aspx