

2023

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April 12, 2023





PAG-03

General Permit for Discharges of Stormwater Associated with an Industrial Activity

- Last Year Industrial Stormwater Permit
 - PAG-03 (Upcoming Changes)
- PAG-03 Changes Implemented as of March 24, 2023

 Areas for Members to be Aware Related to Compliance with the Current PAG-03





- Stormwater Permits Required for Industrial Operations
 - Federal Clean Water Act
 - PA Clean Streams Law



PAG-03 Authorizes Stormwater (March 24, 2023)
 Discharges in Accordance with Monitoring Requirements
 BMPs, and Conditions of Part A, B, C AND Appendix M





- PAG-03 Effective for 5 Years
- If You Can't Meet the Permit Conditions, 90 Days to Apply for Individual Permit
- If you Operate Under PAG-03, Be Aware of
 - BMPS
 - Monitoring, and
 - Reporting
- Renewal (a new NOI) Required 60 Days Prior To Permit Expiration Date (March 23, 2028)





- Submit Notice of Intent (NOI) By March 23, 2023
 - How did we do? All NOIs submitted?
- Any Changes to Receiving Waters?
 - Permit Denial?









DEP may deny coverage under this General Permit and require submission of an application for an individual permit based on a review of the NOI or other relevant information, including monitoring data. DEP will notify applicants of this denial and requirement to submit an application for an individual permit in writing.

PAG-03 Lists Discharges that Are NOT Authorized





- Stormwater discharges that, individually or in combination with other similar discharges, are or have the potential to be a contributor of pollution, as defined in the Pennsylvania Clean Streams Law, which are more appropriately controlled under an individual permit. (25 Pa. Code § 92a.54(e)(1))
- The discharger is not, or will not be, in compliance with any one or more of the conditions of the General Permit. (25 Pa. Code § 92a.54(e)(2))
- Stormwater discharges proposed by a person responsible for other activities regulated by DEP who has failed and continues to fail to comply or has shown a lack of ability or intention to comply with a regulation, permit, schedule of compliance or order issued by DEP. (25 Pa. Code § 92a.54(e)(3))
- Stormwater discharges that contain pollutants for which a change has occurred in the availability of demonstrated technology or practices for the control or abatement of the pollutants. (<u>25 Pa. Code § 92a.54(e)(4)</u>)
- Stormwater discharges for which categorical point source effluent limitations are promulgated by the U.S. Environmental Protection Agency (EPA) and other sector-specific prohibited discharges identified in the appendices to this General Permit. (<u>25 Pa. Code § 92a.54(e)(5)</u>)
- Stormwater discharges that are not in compliance or will not result in compliance with an applicable effluent limitation or water quality standard. (25 Pa. Code § 92a.54(e)(6))
- Stormwater discharges from a facility for which an individual permit is required for other point source discharges, and issuance of both an individual permit and authorization for coverage under a General Permit for the facility would constitute an undue administrative burden on DEP. (25 Pa. Code § 92a.54(e)(7))
- Stormwater discharges that DEP determines require an individual NPDES permit to ensure compliance with the Federal Clean Water Act, the Pennsylvania Clean Streams Law or DEP regulations. <u>25 Pa. Code § 92a.54(e)(8)</u>)





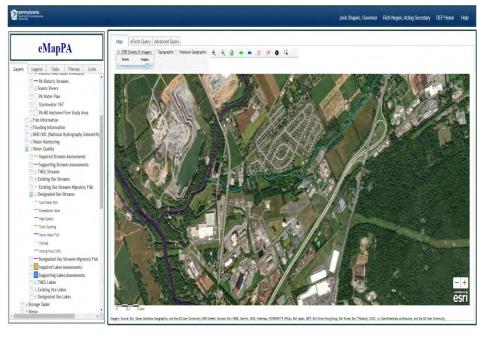
- Stormwater discharges directly to surface waters classified as High Quality Waters (HQ) or Exceptional Value Waters (EV) under 25 Pa. Code Chapter 93 (relating to Water Quality Standards). (25 Pa. Code § 92a.54(e)(9))
- 10. Stormwater discharges containing toxic or hazardous pollutants as defined in sections 307 and 311 of the Clean Water Act (33 U.S.C. §§ 1317 and 1321), or any other substance which, because of its quantity, concentration or physical, chemical or infectious characteristics, may cause or contribute to an increase in mortality or morbidity in either an individual or the total population, or pose a substantial present or future hazard to human health or the environment when discharged into surface waters. (25 Pa. Code § 92a.54(a)(5))
- Stormwater discharges that individually or cumulatively have the potential to cause or contribute to a violation of an applicable water quality standard established under 25 Pa. Code Chapter 93 (relating to water quality standards) or cause significant adverse environmental impact. (<u>25 Pa. Code § 92a.54(a)(7)</u>)
- 12. Stormwater discharges to impaired waters (with or without an approved Total Maximum Daily Load (TMDL)) where the discharges contain or are expected to contain pollutants at concentrations that have the potential to cause or contribute to the impairment, stormwater discharges that are subject to a Wasteload Allocation (WLA) in a TMDL, and discharges that are inconsistent with the assumptions and requirements of a TMDL.
- Stormwater discharges that would adversely affect a listed endangered or threatened species or its critical habitat. (25 Pa. Code § 92a.12(c))
- 14. Stormwater discharges from a facility covered by an individual permit when coverage under the General Permit would result in less stringent effluent limitations or terms and conditions.
- 15. Non-stormwater discharges and stormwater discharges containing pollutants that are intentionally introduced by the permittee, unless specifically authorized by DEP in writing.
- 16. Stormwater discharges associated with construction activity as defined in 40 CFR § 122.26(b)(14)(x) or 40 CFR § 122.26(b)(15); stormwater discharges associated with mineral extraction activity as defined in 40 CFR § 122.26(b)(14)(iii); and stormwater discharges associated with treatment works treating domestic sewage as defined in 40 CFR § 122.26(b)(14)(ix).
- 17. Stormwater discharges that occur at new or existing facilities with cooling water intake structures as defined in 40 CFR §§ 125.81 and 125.91, respectively.
- Stormwater discharges where one or more of the sector-specific discharge prohibitions apply, as identified in the appendices to the General Permit.





- High Quality (HQ) Waters or Exceptional Value (EV) Waters per Chapter 93
- Impaired Waters Total Maximum Daily Loads (TMDL)
- Non-Stormwater
 Discharges







PAG – 03 STORMWATER PERMIT

- C. The permittee may not discharge:
 - Floating solids, scum, sheen, or substances that result in observed deposits in the receiving water. (25 Pa. Code § 92a.41(c))
 - Oil and grease in amounts that cause a film or sheen upon or discoloration of the waters of this Commonwealth or adjoining shoreline. (25 Pa. Code §§ 92a.48(a)(2), 95.2(2))
 - Substances in concentration or amounts sufficient to be inimical or harmful to the water uses to be protected or to human, animal, plant, or aquatic life. (25 Pa. Code § 93.6(a))
 - Foam or substances that produce an observable change in the color, taste, odor or turbidity of the receiving water. (25 Pa. Code § 92a.41(c))







Key Definitions

Non-Stormwater Discharges means discharges that do not originate from storm events. They can include, but are not limited to, discharges of process water, air conditioner condensate, non-contact cooling water, pavement wash water, external building washdown, irrigation water, or uncontaminated ground water or spring water.

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures and other management practices to prevent or reduce the pollutant loading to surface waters of the Commonwealth. The term also includes treatment requirements, operating procedures and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. The term includes activities, facilities, measures, planning or procedures used to minimize accelerated erosion and sedimentation and manage stormwater to protect, maintain, reclaim, and restore the quality of waters and the existing and designated uses of waters within this Commonwealth before, during and after earth disturbance activities. (25 Pa. Code § 92a.2)









Key Definitions

Benchmark Value means the concentration of a pollutant that serves as the threshold for the determination of whether existing site best management practices are effective in controlling stormwater pollution. Benchmark values are not effluent limitations. Two or more consecutive monitoring period exceedances of benchmark values triggers the requirement to develop and submit a corrective action plan, implement additional controls, or apply for an individual permit if notified in writing by DEP.

Corrective Action Plan means a document or correspondence submitted to DEP that identifies additional pollutant control measures or BMPs that will be implemented by the permittee in order to reduce the concentration of pollutants in stormwater discharges to levels at or below benchmark values specified in sector-specific appendices of the PAG-03 General Permit, along with an implementation schedule.





- Monitoring Requirements BMPs, and Conditions of Part A, B, C AND Appendix M
 - Stormwater Sampling Program

	Monitoring Requ				
Pollutant	Minimum Measurement Frequency	Sample Type	Benchmark Values		
Total Nitrogen (mg/L) (3)	1 / 6 months	Calculation	xxx		
Total Phosphorus (mg/L)	1 / 6 months	Grab	xxx		
pH (S.U.)	1 / 6 months	Grab	9.0		
Oil and Grease (mg/L)	1 / 6 months	Grab	30		
Total Suspended Solids (TSS) (mg/L)	1/6 months	Grab	100		





- Records Retention 3 Years from Date of Sampling
- eDMR Submittal
- With 28 Days
 After Monitoring
 Period

800-PM-BCW0083g Re MR Appendix M Pennsylvania Switter of Page Page PERMITTEE NAME/A			NATIONAL	PARTM	BUREAU C	VIRONI OF CLE	MENTAL AN WAT	PROTECTIO	NPDES)						03 DMR		
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- Annual Reporting
 - First Due MAY 1, 2023
 - Every Year After by March 23
 - DEP FORM (4 pages)
 - Certification
- **Annual** Fee \$500



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Annual Report	
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COMMONWEALTH OF PENNSYLVANIA DEPARTMENT OF ENVIRONMENTAL PROTECTION BUREAU OF CLEAN WATER

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) DISCHARGES OF STORMWATER ASSOCIATED WITH INDUSTRIAL ACTIVITY ANNUAL REPORT FOR THE PERIOD JANUARY 1, _____ TO DECEMBER 31, _____

Parrithe Name:		Permit No.:		
Permittee Address		Permit Appre	ovel Date:	
Permittee City, State, Zp:		Pamiliae Pr	tone:	
Municipality		County:	11.3	
The permittee intends to continue operating under the PAG-03	General Perm	it in the next	calendar year	1.71
Has the permittee's PPC Plan been reviewed and. If necessary, upo	dated during f	he reporting p	Y 🗋 Yoned	es 🖸 Ne
Has employee training been provided during the reporting period? Identify the PAG-03 Appendix(ces) the permittee to subject to:	Yes	No No	Date:	_

INSPECTION INFORMATION

Document all yours inspect	tions conducted by the perm	titles during the reporting period below.

Inspection No.	Inspection Data	Inspector Name	Inspector Title	Stormwater Discharge During Inspection?
100 Berlin		1		
		· · · · · · · · · · · · · · · · · · ·		
i.				

2. Check the appropriate boxes to indicate areas, activities and practices evaluated during the inspections

Areas where industrial materials or activities are exposed to stormwater.

- Areas identified in the PPC Plan as polantial pollutant sources.
- Areas where spills or leaks have occurred in the past three years
- Stormwater outfails and locations where authorized non-alormwater discharges may commingle.

Physical BMPs used to comply with this General Permit.

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- Physical Changes Give Notice to DEP within 30 Days
- (i) New impervious surfaces.
- (ii) New bulk chemicals, stored materials, or solid wastes that are exposed to precipitation or stormwater runoff.
- (iii) An alteration to the site that would allow stormwater from off-site to flow onto the site.
- Transfers of Permit One Operator To Another
 - Allowed, but Must Notify DEP





- BMPs for ALL Permit Users
 - Shall be Implemented AND Maintained

Good Housekeeping Practices Erosion and Sediment Controls Spill Prevention and Response Pollution Prevention Contingency Plans Routine Inspections Implement Monitoring Program







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- Pollution Prevention and Exposure Minimization
 - SPCC and PPC Plans (check for consistency between PAG-03 and Plans)
 - Update Plan when Needed, Document Training
- Maintain Accessibility to All Out Falls for Inspections and Sampling







RT Environmental Services, Inc.

 Inspection During Storm Event At least Once Per Year







Discharges from Secondary Containment

Discharges from valve-controlled stormwater retention structures shall be subject to the following requirements:

- a. Prior to initiating a discharge from these structures, the permittee shall visually inspect the stormwater to determine if there is a visible sheen and/or other floating materials.
- b. All visible sheening and/or floating materials shall be removed and properly disposed of prior to discharge.
- c. The permittee shall collect samples for the purpose of satisfying monitoring requirements in the applicable appendix to this General Permit within the first five minutes of the onset of the discharge.
- d. The permittee shall ensure that the retained stormwater is discharged in such a way to prevent the transport of any accumulated settled solids within the stormwater retention structure.
- Who Completed It? How Was It Documented?





- Sample Collection
 - Plan for Storm Events to Meet PAG-03 Requirements
 - 72 Hours Between Storms



- Collect within First 30 Minutes of Discharge
- Sample for All NEW Parameters
 - Total Nitrogen (Check with Lab)

Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO₂+NO₃-N), where TKN and NO₂+NO₃-N are measured in the same sample.

Total Phosphorus





- A. Provide for secondary containment around asphalt and petroleum product tanks; install leak detection and high level overflow devices.
- B. Practice good housekeeping by periodically removing dust and spilled materials from throughout the site.
- C. Divert stormwater run-on from aggregate storage areas and design piles to minimize erosion and control runoff.
- D. Only perform vehicle washing in dedicated areas; collect washwater from storm drainage separately.
- E. Complete truck wheel washing if necessary to avoid off-site material tracking.
- F. Utilize dust control agents.
- G. Use biodegradable truck release materials.



- H. Wash trucks using biodegradable washing materials or wash trucks indoors.
- 1. Use silt fences or rock filters around piles or sediment basins to control turbidity in runoff.
- J. Ensure that vegetated drainage ditches and swales are properly seeded and any accumulated materials in them have been removed at least annually.







Wheel Washing to Remove Sediment









Asphalt Berms or Diversions

We Have Plenty of Asphalt at Sites and It can be a Simple BMP



Clean Inlets as a BMP



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Biodegradable Truck Bed Release Agents

And Collection Systems











Rock Filters and Sediment Controls – Maintenance After Storms







York County Conservation District



RT Environmental Services, Inc.

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• Benchmark Exceedances – **SO WHAT HAPPENS NEXT**



 Total Suspended Solids, Oil and Grease Most Common Issues





- After 2 or More Consecutive Events
 - Submit Corrective Action Plan within 90 Days
 - Evaluate Alternatives to Reduce Stormwater Concentrations
 - Implement all relevant and feasible control measures
- After 4 or More Consecutive Events
 - Submit New Corrective Action Plan AND BMP Checklist within 90 Days





3800-PM-BCW0083I 1/2022 Stormwater BMPs Checklist

APPENDIX M

ASPHALT PAVING, ROOFING MATERIALS AND LUBRICANTS

Best Management Practices	Reason Why Infeasible or Not Implemented
Ensure that all BMPs contained in Part C of the General Permit and all applicable appendices have been implemented are in good working order.	
Confine storage, loading/unloading, and transfer activities to designated, labeled areas outside of drainage paths and away from surface waters and high traffic areas.	
 Provide concrete or otherwise impervious pads and adequate secondary containment for all storage of drums, containers, materials, fuel tanks, etc. and provide permanent cover or locate pads indoors. 	
Prevent run-on and divert stormwater around fueling areas using vegetated swales and/or berms.	
Use curbing, dikes, and gutters to contain and collect spills.	
Divert stormwater around storage areas using vegetated swales and/or berms.	
Implement an increased regular sweeping, maintenance, and inspection schedule for all areas, containers, and BMPs.	
	 Ensure that all BMPs contained in Part C of the General Permit and all applicable appendices have been implemented are in good working order. Confine storage, loading/unloading, and transfer activities to designated, labeled areas outside of drainage paths and away from surface waters and high traffic areas. Provide concrete or otherwise impervious pads and adequate secondary containment for all storage of drums, containers, materials, fuel tanks, etc. and provide permanent cover or locate pads indoors. Prevent run-on and divert stormwater around fueling areas using vegetated swales and/or berms. Use curbing, dikes, and gutters to contain and collect spills. Divert stormwater around storage areas using vegetated swales and/or berms. Implement an increased regular sweeping, maintenance, and inspection schedule for all

You have to consider implementation of ALL additional stormwater BMPs from the checklist.





- PAG-03 Take-A-Ways
- Goal is to Prevent Impacts to Discharged Stormwater
- Review the Permit and Make Sure You Follow BMPs





- Sampling Per NEW Appendix M
- Benchmark Values And Corrective Actions
- Inspections and Records
- Reporting

PAPA



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OPEN DISCUSSION AND QUESTIONS



