



Storm Water Permits for Industrial Activities

GECAP of the Georgia Tech Research Institute is a voluntary, non-regulatory environmental compliance program funded by the Georgia Legislature through the University System of Georgia.

What is a storm water permit?

A storm water permit is a special type of National Pollutant Discharge Elimination System (NPDES) permit that allows storm water discharges associated with industrial activities. This permit is often referred to as the NPDES Industrial General Storm Water Permit (IGP). This storm water permit is necessary because there is a higher concentration of pollutants per facility that can elevate pollutants in the receiving state waters if remedies are not in place to eliminate runoff during storm events.

What are storm water discharges?

Storm water discharges occur whenever runoff from rain, snowmelt, or other precipitation leaves a facility and enters surface waters or drainage paths leading to surface waters. Generally considered to be point source discharges, storm water discharges are differentiated from the facility's process wastewater, which are either released to the local wastewater treatment plant through the sanitary sewer or are permitted separately if they are released via surface flow. If any process wastewater comes in contact with storm water, then all the water becomes wastewater. Storm water pollution can occur when pollutants are picked up by storm water runoff and carried off site or into surface waters.

What are the typical contaminants that are regulated for storm water?

Storm water runoff contaminants are not necessarily things one would consider toxic or poisonous. Runoff can contain toxic pollutants such as heavy metals or organic chemicals. However, trash, debris, sediment, and oil and grease are also considered contaminants.

Which facilities must obtain an industrial storm water permit?

A broad variety of industrial facilities became subject to storm water discharge permitting rules as of October 1992. Under the provisions of federal regulations ([40 CFR 122.26](#)), there are ten categories of industrial activity that must address their storm water discharges by one of two ways—obtain a storm water permit by filing a Notice of Intent (NOI) OR file for the No Exposure Exclusion (NEE) Certification.

1. Facilities subject to performance standards (storm water effluent limitations, new source performance standards, or toxic pollutant effluent standards in 40 CFR subchapter N);
2. Wood, paper, chemical, petroleum, leather, glass, and metal production facilities, and shipyards (SIC codes 24xx, 26xx, 28xx, 29xx, 311x, 32xx, 33xx, 3441, and 373x);
3. Mining and petroleum exploration, production, and/or processing facilities (SIC codes 10xx through 14xx);
4. Hazardous waste treatment, storage, or disposal facilities (TSDF);
5. Landfills, land application sites, and open dumps (note: open dumps are not allowed in Georgia) that receive any industrial wastes;
6. Recycling facilities, including scrapyards, battery reclaimers, salvage yards, and auto junkyards;
7. Steam electric generating plants;
8. Vehicle maintenance, equipment cleaning operations, or airport deicing operations at transportation facilities;

9. Treatment works treating domestic sewage or other wastewater; and
10. Light manufacturing facilities with SIC codes 20xx, 21xx, 22xx, 23xx, 2434, 25xx, 265x, 267x, 27xx, 283x, 285x, 30xx, 31xx (except 311x), 323x, 34xx (except 3441), 35xx, 36xx, 37xx (except 373x), 38xx, 39xx, and 4221 through 4225.

Note that light manufacturing facilities with an air emissions permit may need to also obtain a storm water permit because airborne materials may be washed out of the air during a rainfall event.

The best way to discern whether your facility must satisfy the requirements of addressing industrial storm water is to first find the SIC code on OSHA's website (<https://www.osha.gov/pls/imis/sicsearch.html>) and then look it up in [Appendix D of the permit](#).

How do I obtain an industrial storm water permit?

In order to obtain coverage under Georgia's 2012-2017 NPDES General Permit No. GAR050000, you must submit a Notice of Intent (NOI) form to the Georgia Environmental Protection Division (EPD). This short form is available from the EPD Storm Water Unit at 404-463-1511 or from the EPD website at <http://epd.georgia.gov/npdes-industrial-storm-water-general-permits>. Obtaining permit coverage under the IGP will authorize your facility to discharge storm water associated with industrial activity, provided that you comply with the terms and conditions of the permit. A copy of the permit can be obtained from the GECAP website at <http://www.gecap.org> or printed from <http://epd.georgia.gov/npdes-industrial-storm-water-general-permits>. The EPD will not mail you a copy of the permit. EPD does not acknowledge receipt of submitted paperwork; therefore, use a trackable form of mail to serve as the return receipt and retain as confirmation of all submittals.

New facilities beginning industrial operations after the effective date of the permit are required to submit the NOI form a minimum of 7 days prior to commencing operations.

What will the permit require?

Each facility covered by the permit must develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP will identify potential sources of storm water pollution at the facility, and establish a system of Best Management Practices (BMPs) that will control and minimize storm water pollution from those sources. The components of this document are described in [Part 5 of the permit](#). The SWPPP is not required to be submitted to the EPD, but is kept at the facility to be available for inspection upon request.

In addition, there are specific requirements for routine, quarterly, and annual inspections of the facility and quarterly visual inspections of storm water runoff. Certain types of facilities are also required to collect annual grab samples of storm water discharges and have them analyzed for specific contaminants. Each type of facility has a section within the permit ([Part 8, Sector Specific](#)), which indicates what types of facilities must conduct annual analytical sampling. Facilities that discharge storm water associated with industrial activity upstream and within one linear mile of an impaired stream may have additional requirements under Appendix C. All facilities must produce an annual report covering the previous year. This annual report is due to EPD at the end of January. The annual report form is found on the EPD's website at <http://epd.georgia.gov/npdes-industrial-storm-water-general-permits>.

What are the contents of an SWPPP?

The general permit presently issued by the EPD is over 130 pages in length and includes extensive background on the required contents of the SWPPP, with pages 37-105 providing sector-specific BMP suggestions and analytical sampling requirements. In brief, the SWPPP will contain the following sections:

1. *Identification of the Pollution Prevention Team*: the individuals who will implement the SWPPP and an outline of what their responsibilities will be.

2. *Description of potential pollutant sources:* includes a site map which shows the location of exposed materials, identifies pollutants, shows the predicted direction of runoff flows, and the location of all storm water outfalls.
3. *Identification of non-storm water discharges:* lists any significant sources of non-storm water discharge (e.g., air conditioner condensate, cooling tower blow-down discharge, etc.)
4. *Identification of areas with potential for soil erosion.*
5. *Discussion of measures and controls:* details what housekeeping and preventative maintenance activities will be used to minimize storm water pollution, along with what procedures will be followed in the event of a material spill that could contaminate runoff.
6. *Quarterly and routine site inspections and an annual comprehensive site evaluation/inspection:* details inspections of the facility to verify that all measures and practices specified in the SWPPP are in place and that these measures are adequate.
7. *A schedule for employee training in spill response procedures.* Training must occur at least annually. Training is required of all employees who work in areas where industrial or material handling activities could be exposed to storm water. Training is also required of those who are responsible for implementing activities required by the permit. Training should cover the contents of the SWPPP, control measures, spill containment and cleanup procedures, maintenance, monitoring, inspection, planning, reporting, and documentation requirements.

How can I get help with the SWPPP?

Georgia Tech's GECAP program (404-407-8082) can provide technical assistance with the SWPPP, including review of your draft plan. Some facilities choose to hire a consultant to develop their site specific SWPPP. A document *Developing Your Storm Water Pollution Prevention Plan* is available at http://www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf. Additionally, in 1992 the EPA produced document EPA 833-R-92-002

entitled [*Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices*](#). This document is currently out of print, but can be obtained from the GECAP website.

What facility inspections are necessary to keep my SWPPP up to date?

The general permit requires that any equipment or areas designated as critical to storm water pollution control be inspected at least once quarterly for BMP deficiencies or other incidences of non-compliance as stated within the routine facility inspections (Part 4.1). You should keep a written record of the inspection with the SWPPP documenting observations, findings of non-compliance and any corrective action taken. In addition, the entire site must be inspected annually to evaluate the effectiveness of storm water pollution-limiting measures and the condition of related equipment and facilities. As with the routine inspections, a written record must be maintained at the facility, but is not required to be submitted to the EPD. Typically, facilities use the annual report form to conduct their annual inspections. If any changes to equipment or procedures are called for, the SWPPP must be updated accordingly within thirty (30) days.

How do I satisfy the quarterly visual storm water inspection (Part 4.2) requirement?

All permittees are required to conduct a visual examination of samples collected from each storm water discharge point (outfall) during a storm event at least once per calendar quarter. If there is not enough rainfall to conduct a visual inspection, make a note within the annual report submittal. It is also advisable to keep rainfall records. The samples must be collected within 30 minutes after the beginning of a discharge from rainfall events of at least 0.1 inch or better and at least 72 hours after the end of the previous measurable event. The person performing the inspection must use a transparent container and observe the appearance of the runoff for obvious indicators of storm water pollution such as color, odor, turbidity (i.e., cloudiness or haziness), floating solids, settled or suspended solids, foam, oil sheen, materials associated with municipal or domestic sewage,

and industrial waste, and any other objectionable conditions. Written records of the visual inspections must be maintained with the SWPPP.

How do I know if my facility discharges to an impaired stream?

If your facility discharges directly into an impaired stream segment OR upstream and within one mile of an impaired stream segment, you may be subject to additional sampling requirements in Appendix C of the permit. This additional sampling is required if the pollutant of concern (POC) for the stream segment may be exposed to storm water as a result of current or past industrial activity on your site. Impaired stream segments and their associated pollutants of concern are identified on Georgia's most recent 305(b)/303(d) list, which is available on EPD's website <http://epd.georgia.gov/georgia-305b303d-list-documents>. To determine whether or not your site is within one mile of an impaired stream segment you should consult a topographic map of your area. GECAP has created a web-based tool for obtaining this information, found at http://gecap.org/?page_id=218.

Appendix C of the permit does not allow coverage for new permittees unless certain requirements are met (Appendix C.1) and has special requirements for those facilities previously permitted.

My facility falls under one of the ten industry groups required to obtain a permit, but I have no activities or materials outside.

Do I still need to get a permit?

The facility must meet the requirement of either filing the NOI and having a permit or filing the "No Exposure Exclusion Certification" for exemption status. In accordance with the U.S. EPA's Phase II Storm Water Regulations, the EPD has implemented a conditional Industrial No Exposure Exclusion for exemption from storm water permitting. Industrial facilities that can certify to a condition of No Exposure may now claim exemption from storm water permitting requirements. In essence, to be eligible for exemption from permitting under Phase II, a facility cannot have any industrial materials or activities, or other potential storm water contaminants exposed to rainfall.

What constitutes No Exposure?

No Exposure means that all industrial materials and activities are protected by a storm water resistant shelter to prevent exposure to rain, snow, snowmelt, and/or runoff. A "Storm-resistant shelter" includes completely roofed and walled buildings or structures as well as structures with only top cover but no side coverings, provided the material under the structure is not otherwise subject to any storm water run-on and subsequent runoff.

Industrial materials or activities include, but are not limited to, material-handling equipment or activities, industrial machinery, raw materials, intermediate products, by-products, final products, or waste products.

However, a storm resistant shelter is NOT required for the following industrial materials and activities: drums, barrels, tanks, and similar containers that are tightly sealed, provided those containers are not deteriorated and do not leak. "Sealed" means banded or otherwise secured and without operational taps or valves (without protection or a storm resistant shelter, no material can be added or withdrawn from these containers). Common "totes" with operational valves are precluded from this bulk storage category and would need to be stored under a storm water resistant shelter in order to qualify for No Exposure.

Some items which would qualify for No Exposure may include:

- Lidded dumpsters which are completely covered and where no material can be lost during loading onto a garbage truck nor can drain out the holes in the bottom.
- Adequately maintained vehicles.
- Above-ground storage tanks (ASTs),* provided:
 1. They are separated from and not associated with any vehicle maintenance operations;
 2. There are no piping, pumps or other equipment leaking contaminants that could contact storm water;

3. Where feasible, some form of secondary containment exists.

* ASTs may also be exempt from the prohibition against adding or withdrawing materials to/from the external container.

How can I claim the Industrial No Exposure Exclusion?

You must complete and submit the EPD's Industrial No Exposure Exclusion Certification form. This five-page form (including instructions) can be obtained by contacting the EPD Storm Water Unit at 404-463-1511, or by visiting EPD's website at <http://epd.georgia.gov/npdes-industrial-storm-water-general-permits>. The form uses a series of yes/no questions to aid facility operators in determining whether or not they have a condition of No Exposure. If your facility is able to answer all the questions in the negative, you qualify for the No Exposure exclusion. To complete the process, you must sign and submit the form via trackable mail to EPD. The address for submission is included within the form.

What if I currently hold a General Storm Water Permit but I can certify No Exposure?

EPD's Industrial No Exposure Exclusion Certification form asks if the facility is previously covered under NPDES General Storm Water permit. Mark "yes" to this question and submit your completed form to EPD. Upon submittal of a valid No Exposure certification form to EPD, the requirement for your facility to have a storm water permit will cease as long as the condition of No Exposure exists at the facility. It is not necessary for a storm water permittee to submit a Notice of Termination along with the No Exposure form.

How often do I have to certify No Exposure with the EPD?

The EPD's Industrial No Exposure Exclusion Certification form must be resubmitted at least once every five years.

What happens if the condition of No Exposure is not maintained?

Under the Phase II rules, the No Exposure exclusion is conditional and not an outright exemption. Facilities are required to conduct quarterly inspections each year after the effective date of the General Permit to ensure that a condition of No Exposure is maintained at the facility. The results of each inspection should be retained at the facility and available to EPD upon request. If an inspection shows that a condition of No Exposure does not exist, then the facility has 30 days to implement appropriate corrective action or the facility must create a SWPPP and submit a NOI by the end of that 30 day period to obtain coverage under the General Permit.

What if I already have another type of NPDES permit?

Check your current NPDES permit for a bullet clause that authorizes storm water discharges. If your permit contains this bullet, your storm water discharges will be covered under your current NPDES permit until it expires. When your NPDES permit expires, you may be required to obtain a General Storm Water Permit and comply with applicable regulations. If your permit does not contain the bullet clause, you must comply with the General Storm Water NPDES Permit requirements.

What about construction activities?

An industrial stormwater permit is a separate permit from that issued for construction activities. Contact the EPD at 404-463-1511 for details.

For More Information

For additional help with storm water permits, contact GECAP personnel at 404-407-8082 or send an email to Paige Rohrig at paige.rohrig@gti.gatech.edu, or contact EPD's Storm Water Unit at 404-463-1511.

Updated 8/2014



For more information, contact GECAP:
Georgia Tech Research Institute
Atlanta, Georgia 30332-0837
404-407-8082 <http://www.gecap.org>

Printed on

recycled paper