



# Summary of Reissued Minnesota Industrial Stormwater Permit

Presented at  
The Auditing Roundtable  
Minneapolis, Minnesota



**CALTHA**



# MPCA Industrial Stormwater Permit

- Replaced permit that expired in 2002
- Effective April 4, 2010
- All affected sites must reapply, including:
  - No Exposure Certification sites, and
  - Permitted sites
- Applications due based on sector
  - June 7, August 4 or October 6
- Site must have new SWPPP and implement non-structural BMPs prior to application submittal



# Applying Quality Principles To Regulatory Requirements

- Plan-Do-Check-Act
- Incorporates key quality program elements
  - Emphasis on written procedures and documentation
  - Internal checks on system performance
  - Quantitative acceptance criteria
  - Training
  - Corrective action
  - Preventive action



# MPCA Industrial Stormwater Permit

Part I - AUTHORIZATION UNDER THIS PERMIT

Part II. APPLICATION REQUIREMENTS

Part III. STORMWATER CONTROL MEASURES

Part IV. STORMWATER POLLUTION PREVENTION  
PLAN (SWPPP)

Part V. BENCHMARK MONITORING REQUIREMENTS

Part VI. EFFLUENT MONITORING REQUIREMENTS

Part VII. SECTOR-SPECIFIC REQUIREMENTS

Appendix A. SPECIAL REQUIREMENTS



# Part III – Stormwater Control Measures

- A. Good Housekeeping
- B. Eliminating and Reducing Exposure
- C. Salt Storage
- D. Erosion Prevention and Sediment Control
- E. Management of Runoff
- F. Facility Inspection Requirements
- G. Maintenance Requirements
- H. Elimination of Unauthorized Non-Stormwater Discharges
- I. Spill Prevention and Response Procedure
- J. Mercury Minimization Plan
- K. Employee Training Program



# F. Facility Inspection Requirements

*“Permittee shall develop and implement an inspection schedule that includes:*

- minimum of one (1) facility inspection per calendar month*
- minimum of two (2) monthly inspections must occur during runoff events, with at least one being performed during snow melt.*

*“7. The SWPPP shall list all personnel who are appropriately trained to conduct facility inspections.”*



# H. Elimination of Unauthorized Non-Stormwater Discharges

*“Permittee shall document that all non-stormwater discharges have been evaluated and all discharges not authorized by this permit or a separate NPDES/SDS permit have been eliminated.”*

# Types of Discharges

- Stormwater
- Authorized Non-Stormwater Discharges
- All Other Discharges





# K. Employee Training

## K. Employee Training Program

The **Permittee** shall develop and implement a training program for employees. Training shall cover stormwater control measures, components and goals of the **SWPPP**, monitoring procedures, and other applicable requirements of the permit. The program shall include a training schedule that includes training at least annually. A record of the trainer's name and trainer's organization (internal or external), and the names of trained individual(s) and dates that the individual(s) received training must be maintained, either in the **SWPPP** or in a separate record stored with the **SWPPP**. Training shall be commensurate with the job function of the employee. At a minimum, the following individuals shall be trained:

1. Employee(s) overseeing implementation of, revising, and amending the **SWPPP**.
2. Employee(s) performing installation, inspection, maintenance, and repair of **BMPs**.
3. Employee(s) who work in areas of **industrial activity** subject to this permit.
4. Employee(s) who conduct **stormwater** discharge monitoring

# Sector Specific Requirements

- 29 Sectors
- Applies to primary sector, plus all co-located sectors
- Modify or add to requirements
  - » Employee Training Requirements
  - » Erosion and Sedimentation Controls
  - » Good Housekeeping
  - » Inspections
  - » Preventive Maintenance
  - » Spills and Leaks
  - » Management of Runoff
  - » Other Industry Specific Control Measures
  - » SWPPP Requirements
  - » Monitoring and Reporting Requirements
  - » Use of Infiltration Devices and/or Stormwater Ponds



# Additional Requirement Based On Location

- Proximity to “impaired waters”
  - Over 3,000 waters in Minnesota
  - Listed by MPCA
  - New impaired waters added
  - Additional requirements related to industrial stormwater may be incorporated into TMDL (pollution control plan for individual waters)
- Proximity to “special waters”



# Appendix A - Special Waters

- Outstanding Value Resource (OVR) water body
- Lake Superior
- Upper Mississippi River (~ north of Little Falls)
- DNR designated Lake Trout lakes
- DNR designated trout lakes and streams
- Calcarous fen
- Federal or state designated scenic or recreational river segments (includes portions of Cannon, Crow, Kettle, Rum, Minnesota, Mississippi, St. Croix)
- Wetlands



# Benchmark Monitoring

- Begins 12 months after permit coverage
- All facilities conduct monitoring
- Quarterly monitoring during first monitoring year
- Must submit Discharge Monitoring Report (DMR) to MPCA each quarter
- Continued monitoring based on results compared to applicable benchmarks



# Relevance To EHS Audits

- More complex to determine applicable requirements
  - Requirements for primary sector, plus collocated sectors
  - Requirements change based on proximity to listed waters
- Significantly more documentation and recordkeeping requirements



# Permit Applies to All Facilities Within Sector

All sites within affected sectors must submit either:

1. No Exposure Conditional Exemption certification, or
2. Permit application



# NEC Compliance

- All materials and industrial activities must be under a storm resistant shelter at all times















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# Permit Compliance





















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# Questions

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