



Regulatory Briefing

Georgia Industrial General Permit (2012 IGP) for Stormwater Discharges

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Georgia will require facilities certifying for No Exposure Exclusion to conduct and document quarterly inspections to confirm on-going compliance with NEE requirements

Overview

The Georgia Department of Natural Resources - Environmental Protection Division (EPD) has issued its final draft "[Authorization to Discharge Under the National Pollutant Discharge Elimination System Storm Water Discharges Associated with Industrial Activity](#)". This permit covers stormwater discharges from certain types of industrial and "industrial-like" operations that are required to have a stormwater discharge NPDES permit.

NPDES permits, including general permits, are reissued on a 5-year cycle. The previous EPD general permit for industrial facilities was written in 2006 and expired in 2011. Therefore, this revised permit was needed to replace the expired one.

The final draft permit includes some of the same requirements that were included in the 2006 IGP industrial stormwater permit. However, some significant changes have also been included, especially relating to stormwater monitoring requirements.

Who Could Be Affected?

The industrial stormwater permit applies equally to all industrial and "industrial-like" facilities in Georgia based on their Standard Industrial Classification, or "SIC Code". Rules apply to any facility **regardless of size or number of employees**.

In addition to manufacturing operations, permit coverage is required for businesses such as warehousing, transportation & logistics, waste treatment and disposal facilities, including as landfills. Permit coverage is also required for airports and water transportation facilities.

Some facilities may be able to receive an exemption from the requirement to have a permit by meeting all the conditions for a No Exposure Exclusion (NEE). Facilities that submitted a NEE certification in the past will have to submit a new NEE form for the 2012 IGP.



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Georgia Industrial Sectors

IMPORTANT:
***Even facilities with
NO OUTSIDE
activities or
storage are
affected by
stormwater rules***

Under the Georgia 2012 IGP, all permittees are divided into industrial sectors. Individual facilities have a **PRIMARY** industrial sector, but can also have collocated industrial sectors, if the nature of their operation falls into multiple sectors.

To determine what requirements apply to the facility, permittees need to determine their primary sector, and all collocated sectors or activities. Their compliance requirements will include all the requirements under their primary sector **AND** all requirements under each collocated sector, if applicable.

EDP has used the same sector designations based on SIC codes used by US EPA in the 2008 Multi-sector General Permit.

Sector-Specific Requirements

In addition to general requirements that must be met by all dischargers, the permit includes additional requirements for facilities in individual sectors. These additional requirements can include:

- Limits on types of discharges permitted
- Additional technology-based effluent limits, including specific BMPs
- Additional SWPPP requirements,
- Additional inspection requirements,
- Additional stormwater monitoring and effluent limits, and
- Sector-specific storm water benchmarks.

Stormwater Monitoring Requirements

The revised permit includes three types of stormwater monitoring requirements which will need to be addressed by some or all permittees:

Quarterly visual assessments: All permittees will need to collect stormwater discharge samples on a quarterly basis and record a visual assessment of the samples, including clarity, and visual indicators of contaminants, etc.

Annual benchmark monitoring: Most industrial sectors will also need to collect samples of stormwater discharge once per year and have samples analyzed at a laboratory. The results from these samples will need to be reported to EPD, and will be used to determine if additional pollution prevention measures are needed and if more frequent monitoring is required.

Effluent Monitoring: Some permittees will also have to conduct effluent monitoring and comply with permit limits. These data will also be reported to EPD.

The 2012 IGP modifies requirements for facilities that discharge to an impaired water. If the pollutant of concern (POC) could be contained in the stormwater run-off, facilities are required to conduct benchmark monitoring twice each quarter, rather than once per year. In addition, the applicable benchmark concentration becomes **equal to the State Water Quality Standard**, and not the sector-specific benchmarks in the 2012 IGP (which are generally higher).

Other Compliance Requirements

The Georgia permit includes many compliance requirements that existing permitted facilities are already familiar with, including:

SWPPP Requirements. Facilities need to prepare and maintain a SWPPP that includes all the elements listed in the permit. For most facilities that have a SWPPP prepared to meet the previous permit, a revision of the SWPPP will be required to address new SWPPP requirements. The SWPPP must be certified by an officer of the company, or equivalent.

Quarterly Site Inspections. A facility must conduct quarterly facility inspections. Inspections must be conducted by a “**Qualified Personnel**”

Corrective Action. A facility must implement and document corrective actions if inspections, monitoring results or other information indicate that the objectives of the SWPPP are not being met. Actions must be documented within 24 hours and completed in less than 90 days.

Prohibited Discharges. Non-stormwater discharges are not allowed under the general permit, which includes most kinds of process wastewater discharge, non-contact cooling water and most wash water. These types of discharge must be either permitted under a different NPDES permit or eliminated.

Annual Comprehensive Inspections. “**Qualified Personnel**” must conduct an Annual Comprehensive Site Inspection. The annual inspection is intended to verify that drainage, potential pollution sources identified in the SWPPP are accurate, and that BMPs are being implemented, and adequately maintained. The annual inspection must also certify that the facility is in compliance with the permit.

Employee Training. All employees working in industrial areas, or responsible for conducting inspections, etc. must have training. Training must cover specific control measures, monitoring, inspection, planning, reporting, and documentation.

What If My Facility Was Covered By The 2006 IGP?

Many facilities that are subject to industrial permitting requirements have already been covered under the previous 2006 IGP. Sites that had coverage under general permit #GAR050000 and intend to continue coverage under the renewed general permit must submit a

new NOI application form **within 30 days** of the effective date of 2012 IGP

New facilities are required to submit an NOI application form **7 days prior** to commencing discharge. If Owner or operator changes, EPD requires notification within 30 days.

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Caltha provides expert consulting services to industries in Georgia subject to stormwater permitting requirements, including:

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