

Meeting Notes
Quarterly Teleconference for Florida Phase I MS4 NPDES Coordinators
Wednesday, July 16, 2014
1:30 - 2:30 pm EST

Agenda:

- Staff Changes – Ed Smith
- MSGP outreach materials – Borja Crane-Amores/Cierra Robinson
- Annual Training Requirements – Michelle Bull
- Bacterial TMDLs: A new approach – Michelle Bull
- Update on WOTUS – Ed Smith
- EPA Webinar – **Building Climate Resiliency with Green Infrastructure**
- SESWA Webinar – **Successful Public Education and Outreach Programs**
- Rule Update – Borja Crane-Amores
- Open Discussion

Next quarterly teleconference: Wednesday, October 15th

NPDES STORMWATER CONTACTS:

Michelle Bull	Phase I MS4 Coordinator	850-245-7561
Ken Kuhl	Phase I/II MS4	850-245-8667
Candace Richards	Phase II MS4 Coordinator	850-245-7523
Borja Crane-Amores	MSGP/CGP	850-245-7520
Edward Smith	Program Administrator	850-245-8568

MSGP OUTREACH – SECTOR S

DEP staff is developing educational fliers for each MSGP sector. These will soon be available on the NPDES Stormwater website under a new education and outreach link. The Sector S flier is attached. If you have any requests for any Sectors you would like to see developed (i.e., an industry that is problematic for your area), please contact Borja Crane-Amores.

ANNUAL TRAINING REQUIREMENTS

Part III.A.9.c.

The permit language for construction site operator training is not consistent. To more fairly implement this element, the Department will only require permittees to provide training to permittee personnel and their contractors for permittee construction sites. This clarifies that training private site operators not contracted by the permittee is not required by the MS4 permit. Please see the table for guidance on filling out the annual reports.

	DEP Inspector Certification	Initial Training	Annual Refresher Training
Permittee (and contracted) construction site inspectors			
Permittee (and contracted) construction site plan reviewers			
Permittee (and contracted) construction site operators			

BACTERIAL TMDLS: A NEW APPROACH

The Department is working on creating a statewide Bacteria BMAP. The BacTAC (Technical Advisory Committee) originally proposed a Restoration Plan, however, we are working with DEAR to use the MS4 permits as an implementation tool based on comments from the MS4 community.

Note: If you have specific questions on this initiative, contact Daryll Joyner.

Q: Kelly Brock, City of Casselberry: How will this affect the BPCP in the current program?

A: DEP is changing the Bacteria standard to *E. Coli* and *Enterococci*. We are working with DEAR to incorporate into the statewide plan whether to continue the BPCP or allow for the BPCP to be updated.

Q: Steve Peene, Applied Technology: TAC had last meeting; when are the next steps coming?

A: We are working with DEAR on including requirements into the MS4 permit conditions, to focus on existing requirements including Illicit Discharge inspections, Public Education and Outreach, and structural BMP inspections. If the MS4 is in an impaired waterbody, they may need a pet waste ordinance/program. Ed is proposing a tiered approach to these requirements based on population and contributions.

Q: Fred Noble, FDOT: Will MS4s have an opportunity to review proposed language?

A: When we have draft language, we will send it to the MS4s.

UPDATE ON WATERS OF THE U.S. (WOTUS)

Working with EPA Region 4 and MS4s. DEP management met with U.S. EPA Region 4 and FDACS. DEP and FDACS agree on each other's comments (nothing formalized yet). The Public Comment Period has been extended until October 20, 2014. EPA has created a website for Waters of the U.S. information and comments. <http://www2.epa.gov/uswaters>

EPA WEBINAR: BUILDING CLIMATE RESILIENCY WITH GREEN INFRASTRUCTURE

July 22, 2014, 1:00 p.m. - 2:30 p.m. EDT [REGISTER!](#)

This 90-minute webcast will highlight Climate Interactive's new Green Infrastructure Decision Support Tool, followed by a presentation on the New York City Green Infrastructure Program's efforts to incorporate climate resiliency into system planning.

Communities are feeling the effects of climate change now. As different parts of the country become drier or wetter, green infrastructure can improve resiliency by helping communities manage flood risk, prepare for drought, reduce urban heat island effects, and protect coasts. There is no one-size-fits-all answer to climate adaptation. However, sharing best practices, learning by doing, and iterative problem solving can help communities choose a suite of adaptation strategies to meet environmental, quality of life and public health goals.

This event is part of EPA's [Green Infrastructure Program](#) 2014 Webcast Series sponsored by the Office of Wastewater Management.

SESWA WEBINAR: SUCCESSFUL PUBLIC EDUCATION AND OUTREACH PROGRAMS

July 31, 2014, 10:30 AM - 11:30 AM EDT Free to attend!

Source control is the most cost effective way to improve the quality of our surface waters. Public education and outreach programs have proven to be very beneficial in improving water quality by changing public behavior so that fewer pollutants enter surface waters. The webinar will review the primary approaches to public education, practices and tools. Case studies of successful public education efforts will be included. This webinar is FREE thanks to the generous support of *the agency*. Seats are limited, so [register today!](#)

RULE UPDATE

MSGP: We are working on rule development, and planning a public workshop this fall.

Phase II GP: Also under review. Timeline: hope to be finalized by early 2015.

CGP: Under EPA review. EPA has requested 90 days for review. The rule is anticipated to be final in October 2014.

Borja is working on the possibility of incorporating equivalent municipal operation MSGPs into the MS4 permit. This would allow MS4s to opt for MSGP requirements for some industrial activities to be rolled into their MS4 permit. This would reduce the cost to municipalities and the number of permit reporting periods to track.

GENERAL DISCUSSION

Q: Connie Jarvis, City of Cape Coral: There is a 6 in lateral sanitary sewer pipe that crosses and SW pipe, with no cross connection. Are there any rules relating to this situation?

A: No, but we suggest adding that area to the ID list, to make sure there is no future cross connection.

Q: Mary Thornhill, City of Winter Haven: We have received no notification that our TMDL Monitoring and Assessment Plan has been approved.

A: We apologize, some documents have been lost in the staff changes. If you have not gotten a response from a document submitted more than 6-months ago, please send to Ed, Michelle or Ken. We are actively working on the backlog of reviewing these documents.

REMINDER:

Staff request that you please include the permit ID number and the main permittee name in the subject field of email correspondence with DEP. This will assist us in proper management of the correspondence and a more timely response.

UPDATED AUDIT SCHEDULE/CONTACT LIST

Permittee	#	AR Due	Audit	New
Bradenton	1	5/30/2014	Complete	Ken
Broward Co	30	3/1/2014	07/2014	Ed
Escambia Co	4	6/30/2014	N/A	Michelle
Ft. Lauderdale	1	3/1/2014	Complete	Ed
Hialeah	1	4/25/2014	Complete	Michelle
Hillsborough Co	3	12/1/2014	Complete	Michelle
Hollywood	1	4/25/2014	Complete	Ed
Jacksonville	4	11/30/2014	Complete	Michelle
Jacksonville Beach	1	5/30/2014	N/A	Michelle
Lee Co	21	3/30/2014	Complete	Michelle
Leon Co	2	4/30/2014	Complete	Michelle
Manatee Co	6	6/30/2014	10/2014	Ken
Miami	1	4/30/2014	N/A	Michelle
Miami-Dade Co	33	12/20/2014	Complete	Michelle
Orange Co	11	4/11/2014	Complete	Ken
Orlando	1	12/28/2014	N/A	Ken
Palm Beach Co	40	3/30/2014	Complete	Michelle
Pasco Co	6	5/30/2014	N/A	Michelle
Pinellas Co	23	6/30/2014	10/2014	Ken
Polk Co	20	3/30/2014	09/2014	Ken
Reedy Creek	1	5/30/2014	Complete	Ken
Sarasota	6	6/30/2014	Complete	Michelle
Seminole Co	9	6/30/2014	08/2014	Michelle
St. Petersburg	1	8/1/2014	10/2014	Ken
Tallahassee	1	5/30/2014	Complete	Michelle
Tampa	1	4/30/2014	Complete	Michelle
Temple Terrace	1	5/30/2014	Complete	Michelle



NPDES Stormwater Permitting for Industrial Activity Sector S: Air Transportation Facilities

The 1972 amendments to the Federal Water Pollution Control Act (Clean Water Act or CWA) provide the statutory basis for the National Pollutant Discharge Elimination System (NPDES) permit program and the basic structure for regulating the discharge of pollutants from point sources to U.S. waters. **Section 402 of the Clean Water Act requires EPA to develop and implement the NPDES program.**

Sector S: Air Transportation

Sector S applies to stormwater discharges associated with Industrial Activity from vehicle maintenance areas, equipment cleaning areas, or deicing areas located at air transportation facilities.

[40 CFR 122.26(b)(14)]

The conditions of this sector apply to airports, airport terminals, airline carriers, and establishments engaged in servicing, repairing, or maintaining aircraft and ground vehicles, equipment cleaning and maintenance (including vehicle and equipment rehabilitation, mechanical repairs, painting, fueling, lubrication) or deicing/anti-icing operations which conduct the above described activities (facilities generally classified as SIC code 45).

Other operations include (not limited to):

- Ground vehicle and equipment maintenance and servicing
- Storage units of all materials (e.g., used oils, hydraulic fluids, spent solvents and waste aircraft fuel)
- Fuel servicing activities or other operations conducted in support of the airport fuel system
- Facilities which conduct aircraft and/or runway (including taxiways and ramps) deicing/anti-icing operations

Regulated Standard Industrial Classification (SIC) Codes

- 4512 Air Transportation, Scheduled
- 4513 Air Courier Services
- 4522 Air Transportation, Nonscheduled
- 4581 Airports, Flying Fields, and Airport Terminal Services

Monitoring: “Deicing”

Analytical monitoring is only required for airport facilities that use 100,000 gallons or more of glycol-based deicing/anti-icing chemicals and/or 100 tons or more of urea on an average annual basis.

“Deicing” is the process to remove frost, snow, or ice.

“Anti-icing” is the process which prevents the accumulation of frost, snow, or ice.

Industry Monitoring Requirements

Parameter	Benchmark Concentration
Biochemical Oxygen Demand (BOD ₅).	30 mg/L
Chemical Oxygen Demand (COD).	120 mg/L
Ammonia	19 mg/L
pH	6.0 to 9 s.u.

Notices Center

2600 Blair Stone Road, MS #3585

Tallahassee, FL 32399-2400

866-336-6312 (toll-free) or 850-245-7522

NPDES-stormwater@dep.state.fl.us

www.dep.state.fl.us/water/stormwater/npdes/



Discharge Monitoring Reports

2600 Blair Stone Road, MS #2511

Tallahassee, FL 32399-2400

866-336-6312 (toll-free) or 850-245-7522

NPDES-stormwater@dep.state.fl.us

www.dep.state.fl.us/water/stormwater/npdes/



Authority Specifications

Airports typically operate under a single management organization known as the airport authority. Airline carriers and other fixed base operators (e.g., fueling companies and maintenance shops) that have contracts with the airport authority to conduct business on airport property are commonly referred to as tenants of the airport.

Tenants may be of two types—those that are regulated as storm water dischargers associated with industrial activities under 40 CFR 122.26(b)(14) and those that are not.

- If the Airport Authority requests to retain permitting responsibility for all tenants, then one NOI and SWPPP is needed. All tenants must agree to the SWPPP requirements by signing and dating.
- If the Airport Authority does not choose to retain permitting coverage of their tenants, then each tenant must submit their NOI and develop their own SWPPP.

Recommended Best Management Practices BMPs

Stormwater treatment BMPs are intended to prevent or minimize the contamination of runoff, or treat runoff contaminated with pollutants.

Airport BMPs include (not limited to):

- Use of drip pans for the collection of fluid leaks
- Perform all maintenance activities, including storage of aircraft and ground vehicles indoors
- Washing over pervious area
- Use an oil/water separator
- Use a closed loop system
- Dispose of wastewater to sanitary sewage facility
- Maintain an inventory of organized materials used
- Draining all parts of fluids prior to disposal
- Prohibiting the practice of hosing down the apron or hangar floor
- Using dry cleanup methods in the event of spills and/or collect the stormwater runoff from maintenance and/or service areas to provide treatment

Permit Information

Operators of regulated industrial activities must obtain an NPDES stormwater permit and implement pollution prevention techniques to minimize contamination of stormwater runoff.

Upon coverage approval, the permittee will receive the Permit Rule Language, Acknowledgement Letter and Discharge Monitoring Report forms (where applicable).

Coverage under the Multi-Sector Generic Permit is effective for 5 years. Discharge Monitoring Reports must be submitted to DEP in years 2 & 4 (where applicable).

Sector S can be reviewed at the following web address:

<http://www.dep.state.fl.us/water/stormwater/npdes/docs/msgp/sfp.pdf>

How to stay in compliance

- Submit NOI and fee of \$500 on time.
Online: www.FLDEPportal.com/go/
Mail: NPDES Stormwater Notices Center
2600 Blair Stone Road MS 3585
Tallahassee, Florida 32399-2400
- Develop and implement a Stormwater Pollution Prevention Plan (SWPPP).
- For SWPPP Guidance visit:
<http://www.dep.state.fl.us/water/stormwater/npdes/swppp.htm>
- Train employees to follow the SWPPP.
- Inspect your site and conduct required monitoring as identified in your SWPPP.
- Document all changes to the SWPPP. Include the date the changes were made.

