

Minutes
Quarterly Teleconference for Florida Phase I MS4 NPDES Coordinators
Wednesday, July 18, 2018
10:30 - 11:30 am EST

Next quarterly teleconference for Phase I NPDES Coordinators:

- October 18, 2018
- Submit agenda items at least 2 weeks prior of the teleconference to Robin.Babin@dep.state.fl.us.
- Sign up in GovDelivery for teleconference notifications.
https://public.govdelivery.com/accounts/FLDEP/subscriber/new?topic_id=FLDEP_439

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NOTES

HIGH-RISK FACILITIES: Jon Turner

Part III.A.8 of the Phase I MS4 permit deals with Industrial and High-Risk Runoff and requires permittees to implement a program to identify and control pollutants in stormwater discharges to the MS4 to the MEP from:

- any operating municipal landfill(s);
- hazardous waste treatment, storage, disposal and recovery facilities;
- facilities that are subject to EPCRA Title III, Section 313;
- **and any other** industrial or commercial discharge that the permittee determines is contributing a substantial pollutant loading to the MS4.

Generally, this last bullet should include facilities which were identified through the proactive illicit discharge inspection program as per Part III.A.7.c of the permit, or an NPDES-permitted industrial stormwater facility (MSGP) as the permittee deems necessary.

Part III.A.8. requires permittees to maintain an inventory of all facilities which meet those requirements and implement a program for conducting inspections of those high-risk facilities. This program requires a written SOP which includes:

- how to prioritize the facilities which should be inspected:
 - the prioritization should include type of industrial activity,
 - how the raw materials are used and stored onsite
 - size of facility and proximity to sensitive or impaired waterbodies
- the inspection schedule (which should include each identified facility being inspected at least once per permit cycle)

- procedures for how to conduct and document the inspection:
 - Inspections should focus on structural controls and activities such as the use, storage and handling of toxic materials.
 - Stormwater inspections can be coupled with inspections for other purposes, such as pretreatment programs and fire/safety.

The intent is for the permittees to identify and proactively inspect sites which may not meet the regulatory definition of “stormwater discharge associated with industrial activity” (multi-sector general permit MSGP), but which could potentially contribute illicit discharges into the MS4. In addition, the inventory should include those sites which are permitted for industrial stormwater.

If there is a question whether or not a facility meets that definition, contact your MS4 Coordinator or the NPDES Notices Center and we can help to make that determination. Or, if you believe that a permitted facility is not meeting its NPDES permit recruitments, you can contact your local DEP district office and they will be able to send an inspector out to the facility.

EDUCATION AND OUTREACH RESOURCES: Michelle

We encourage permittees to share their education and outreach materials. This allows other permittees to see common techniques and get ideas and templates for their own education. Please share your files with others.

ftp://ftp.dep.state.fl.us/pub/NPDES_Stormwater/Guidance/Education&Outreach/

SOP REVIEW: Steve/Michelle

The Cycle 3 permit required development of SOPs - Standard Operating Procedures (Orange County, Hollywood and Hialeah are required to develop SOPs in Cycle 4). Seven of the nine elements of the permit (exception of Part III.A.2 and III.A.4) require the development of an SOP/written plan. Two SOPs are required to be submitted to DEP for review and approval with Year 1 Annual Report or when updated; Part III.A.7.c Proactive Illicit Discharge Inspection SOP and Part III.A.9.b Construction Site Inspection SOP.

The intent of SOPs is to establish the procedures used to meet the required permit elements. SOPs are an important part of the required MS4 Stormwater Management Program. SOPs should be used to document the permittee’s procedures, schedules, tracking of required permit activities. SOPs are essential for training new MS4 coordinators and for educating relevant field and administrative staff.

Review SOPs annually and revise as needed to accurately reflect permittee current procedures. Other departments should be consulted during review process. During MS4 audits, SOPs will be reviewed for completeness and accuracy to current processes. Having SOPs as documentation is a vital part of documenting permittee activities and having a complete SWMP. The Department will initiate enforcement for those permittees that are not implementing elements of the permit.

Elements of an effective SOP:

- Specific permit requirements are listed in Parts III.A.1-9
- **Who** performs activity (department/section, staff title)
- **What** actions are performed (procedures for performing an inspection),
- **When** the actions are required to be performed to meet permit requirements (frequency)
- **Where** the actions take place (map of area, inventory of structures/facilities)
- **Why** the actions are to be performed (permit/reporting element)
- Process for tracking/reporting

MS4 Phase I SOP checklist:

ftp://ftp.dep.state.fl.us/pub/NPDES_Stormwater/Guidance/Phase%20I%20MS4%20SOP%20checklist_201712.docx

NOTE: If a permittee is using a template or SOP copied from another permittee, the SOP should be updated to accurately reflect each permittee's specific activities. It is not useful to have an SOP that does not accurately reflect your process.

MOBILE CAR WASHES AND PRESSURE WASHING ACTIVITIES: Cierra
Information covered in the linked guidance is specific to Mobile Vehicle Car washing, but may be valuable to permittees for addressing discharges from various other activities:

- Mobile or stationary vehicle washing
- Pressure washing
- Carpet cleaning
- Pool discharge
- Color runs

Types of car washing:

- Mobile Vehicle Washing
 - Based: company warehouse, bus station, dealership
 - Intermediate: Parking lots, gas station for fundraisers, etc.
- Stationary (car washes for passenger and commercial/industrial vehicle wash facilities.)
- Residential/Individual

All car washing activities produce wastewater. By-products of oil, grease, petroleum products, dirt, grit, heavy metals, detergents and other pollutants can all result in violations of water quality standards if not properly managed. Operators of car washes should follow appropriate BMPs regarding car washing and pressure washing (or any activity that could result in non-stormwater discharges) to address potential illicit discharges.

The residential/individual washing of cars is an allowable non-stormwater discharge; however, the department recommends MS4s consider distributing information to educate the public on how to minimize runoff and pollution during these activities, like washing on pervious (grass) surfaces and using biodegradable detergents.

Examples of BMPs:

- Minimize wastewater by using high pressure, low volume techniques and equipment
Discharge to on-site swales, grassy areas
- Contain wastewater with containment booms/pools, storm drain covers, dispose of into sanitary sewer system
- Use minimal detergents and cleaners, use biodegradable soaps

Options for discharging wastewater:

1. Discharge to a Municipal Sanitary Sewer System: Discharges to municipal sanitary sewerage systems go to a wastewater treatment facility. Discharges to a sanitary sewer must have prior approval from the wastewater utility and may require pretreatment.
2. Discharge to Land or Ground: A grassy ground surface can provide treatment for small (i.e. minimal ponding and no runoff) and infrequent discharges. Damage to plants and soil can be avoided by minimizing the use of soaps, detergents, and chemicals. Any solids must be filtered out of the waste stream.
3. Discharge to Surface Water: Discharge of wastewater to stormwater systems or to surface water is prohibited without an NPDES wastewater permit. For more information concerning the permitting requirements involved in discharging to surface water, please contact the local DEP office.

Ultimately, educating those in the industry, as well as residents, to use relevant BMPs is the best way to protect water quality. We intend to develop guidance documents from the NPDES Stormwater program, but if you have any questions or would like educational materials/guidance please visit the FTP site.

ftp://ftp.dep.state.fl.us/pub/NPDES_Stormwater/Guidance/Education&Outreach/