1200-A NPDES Permit Training

Schedules A & B A Brief Summary

February 21, 2018 Salem, Oregon



The permit contains two main sections that outline expectations for permit compliance.

These sections are known as

Schedule A

and

Schedule B



Schedule A - TBELs

(Narrative Technology Based Effluent Limits)

What's a TBEL?

TBELs are methods facilities implement to prevent pollution by using demonstrated technologies for reducing discharges of pollutants into waters of the state.



For Example:

Implement Erosion and Sediment Control (Schedule A.1.a)

- Keep settling ponds clean to maintain proper functionality
- Prevent vehicle track-out with graveled access/egress points, an exit wheel wash, or reducing truck traffic in the mining area during wet weather
- Stabilize stockpiles or overburden to reduce erosion
- Divert stormwater and mine dewatering water away from exposed areas and industrial process areas



Minimize Exposure (Schedule A.1.b)

- Cover manufacturing and other processing areas to prevent contact with stormwater that will discharge to surface water
- Store all hazardous substances in secondary containment
- Store uncured concrete in bermed areas to prevent commingled stormwater from discharging to surface water
- Divert stormwater and mine dewatering water away from industrial process areas
- Conduct cleaning operations indoors or within bermed areas to prevent runoff from discharging



Oil and Grease Control (Schedule A.1.c)

- Install oil/water separators where possible
- Use booms or skimmers in conveyance structures or settling ponds



Waste Chemical and Material Disposal (Schedule A.1.d)

- Cover waste bins
- Avoid accumulation of scrap metal, tires, wrecked vehicles, garbage, trash, etc
- Store usable metal materials under cover, away from areas where stormwater can pond or flow



Housekeeping (Schedule A. 1.f)

- Keep the site clean and orderly
- Implement a sweeping schedule, including and adjacent public roads
- Keep up maintenance of vehicles to reduce leaking
- THIS INCLUDES INSIDE MAINTENACE SHOPS



Preventative Maintenance (Schedule A.1.h)

- Regularly inspect, clean, repair, and maintain ALL industrial equipment and process that are exposed to stormwater
- Clean, maintain, and repair all control measures on a regular basis

PREVENTATIVE MAINTENACE HELPS ENSURE COMPLIANCE



Employee Education (Schedule A.1.j)

- For all employees that work in areas of stormwater exposure or are responsible for implementing the Stormwater Pollution Control Plan
- All new employees within 30 days of hire
- All employees annually
- Cover specific details to help keep the site in compliance
- Make sure employees understand the function of BMPs and how to respond when they fail

IF YOUR EMPLOYEES ARE HELPING YOU, IT HELPS TAKE THE PRESSURE OFF



Water Quality Standards

(Schedule A.4)

- No more than a 10% increase in background turbidity in the receiving water body
- pH varies depending on water body and drainage basin
- Samples can be under the benchmark parameters and still violate water quality standards
- Inspect discharge point frequently for visual turbidity (and other things), if you notice a difference in the turbidity of the stream and the discharge, cease discharge and do something.
 - Notify DEQ or DOGAMI
 - Find out why
 - Do something different
 - Revise the SWPCP



Schedule B Monitoring and Inspections

- All facilities must monitoring for the established statewide benchmarks
 - pH between 5.5 and 9.0 SU (with a meter, NO pH PAPER)
 - TSS or Total Suspended Solids, 100 mg/L or less
 - Settleable Solids, 0.20 ml/L or less
 - Total Oil & Grease, 10 mg/L
- Some facilities have impairment pollutants, these are based off of the receiving water body. Check your assignment letter.
- Samples must be representative of the site discharge. No samples are to be collected after dilution from another drainage basin on the site or another water source.



Schedule B Monitoring and Inspections

- Sampling points must match those described in the SWPCP
- All discharge points must be sampled unless proved to be substantially similar to other discharge points using supporting DATA AND ANALYSIS
 - Use past monitoring data
 - Perform analysis of industrial activities and site characteristics
- All facilities must sample 4 times during each monitoring year, no less than14 days apart
 - Two samples between July 1st through December 31st
 - Two samples between January 1st though June 30th
- Monitoring variances must be requested every year with supporting data and analysis
 - Must demonstrate that onsite retention was enough to prevent discharge
 - Provide rain gauge data
 - Provide photos
 - Additional requirements on a per site basis



All waivers are terminated for all facilities.*

*For facilities administratively extended under the 2012-2017 1200-A NPDES permit



Inspections

Facilities covered under the 1200-A permit have intensive inspection requirements. These inspections are intended to help you catch potential compliance issues or water quality issues early to prevent violations.

So How Often?

- If your site has a stormwater or wastewater containment system, dikes for containment, or ponds having freeboard limits: Daily when operating
- Areas of mine clearing, grading, and excavation: daily when raining or monthly if entire site is stabilized
- All streams within 300 ft of an active seepage pond: weekly when operating
- Industrial activities, BMPs, stockpiles, material storage, and other areas exposed to stormwater: monthly
- Monitoring points: monthly when discharging
- Stormwater Control facilities: annually before wet season



Now Lisa will show us a video about how to sample stormwater, provide a demonstration using a turbidometer, and talk about inspection reports.



Contact Information:

Michael Kennedy
DEQ – Northwest Region
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232
503-229-6843
kennedy.michael@deq.state.or.us

