









CT General Permit for the Discharge of Stormwater Associated with Industrial Activity





What will we be going over?

- ☐ Common Problems
- □ Common Good Housekeeping Violations
- Monitoring Requirements and Sampling Exemptions
- Benchmark Exceedances and Addressing NOVs
- Non-Stormwater Discharges
- ☐ Employee Training Topics
- ☐ Inspection Requirements
- □ Additional Guidance Documents
- ☐ Introduction to EzFile



Industrial GP – Common Problems

- Failure to comply with monitoring requirements (semi-annual, visual, sector-specific, impaired waters)
- SWPPPs are not updated or not certified
- Inspections & training not conducted (while consultants prepare forms and outlines, they are not being used)
- Monitoring Aquatic toxicity testing every year instead of the requirement of only the first two years
- Benchmark exceedances have not been addressed
- Companies believe they have earned an exemption when they actually have not



Industrial GP – Common Problems Continued...

- Improper registrations:
 - Non-contiguous sites (each site requires a permit)
 - 2 operators at on site (each operator requires a permit)
- Subscriber agreements are not signed by the appropriate person
- Missing other permits (vehicle main. discharges)
- Not Following Sector Specific requirements
- Required paperwork is not being kept at the site







Connecticut Department of Energy and Environmental Protection

Most Common Housekeeping Violations Found

- Used batteries stored outside without cover or secondary containment containment
- Clogged catch basins
- Chemical spills on the pavement
- Dumpsters with holes and without covers
- Drums and chemical containers without labels, secondary containment or cover



Bad Dumpsters









Good Dumpsters



"The permittee must ensure that all dumpsters, trash compactors, and "roll-off" containers used to store waste or recyclable materials are in sound watertight condition and have covers and drain plugs intact, or are in roofed areas that will prevent exposure to rainfall and will not allow dumpster leakage to enter any stormwater drainage system. All covers on dumpsters not under a roof must be closed when dumpsters are not being loaded or unloaded."





Catch Basin Maintenance



clogged catch basin



implementation of control measures

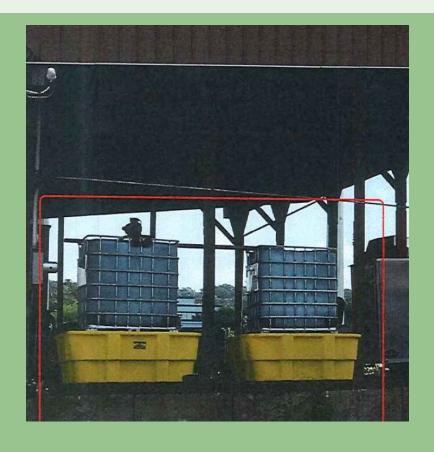


Chemical Storage





Chemical storage without secondary containment or cover



Chemical storage with secondary containment and cover



Monitoring Requirements

Monitoring must be initiated within the first 30 minutes of discharge and during a rain event following a dry period of 72hrs. All monitoring must be at least 30 days apart.

- ✓ Semi-annual analytical monitoring
- ✓ Quarterly visual monitoring- keep onsite in SWPPP
- ✓ Annual aquatic toxicity only required annually for the first 2 years of permit coverage
- ✓ Sector-specific additional monitoring
 - Total Iron (mg/l) 1.0
 - Total Aluminum (mg/l) 0.75
 - Total Copper (no benchmark-entire permit term)
- ✓ Impaired waters/TMDL monitoring (direct discharge and contributing to impairment)



Earning Sampling Exemptions

- ☐ Have the four samples been taken on-time?
- ☐ Are the four samples consecutive?
- □ Does the four sample average fall below the benchmark? Remember to use ½ the detection limit for "ND"
- ☐ Have you submitted your data on proper SMRs to DEEP?
- ☐ Have you included the four sample average "Data Tracking Sheet" into DEEP?

		Sampl	le Result				
Parameter	1	2	3	4	Average	Benchmark*	Qualify for
Sample Date							exemption?
O&G						5.0 mg/L	
Sample pH						5-9 S.U.	
COD						75 mg/L	
TSS						90 mg/L	
TP						0.40 mg/L	
TKN						2.30 mg/L	
NO ₃ -N						1.10 mg/L	
Total Copper					NA	0.059 mg/L	NA
Total Zinc						0.160 mg/L	
Total Lead						0.076 mg/L	

If you are unsure if you are exempt, don't assume you are. Call (860-424-3025) or e-mail (deep.stormwaterstaff@ct.gov) us and ask. Some facilities assume they have an exemption and fail to sample and are now in violation of the permit for failing to monitor.



Benchmarks Exceedances

If an exceedance mathematically certain prior to the 4 event completion:

- review the control measures and perform any required corrective action immediately
- update SWPPP
- continue sampling

<u>Or</u>

If the 4 monitoring event average exceeds the set benchmark:

- determine what improvements need to be implemented (120 days)
- review control measures
- update SWPPP
- continue sampling





Addressing Notices of Violation (NOVs)

- Field NOV-15 days for compliance statement and timeline.
- Office NOV-30 days for compliance statement and timeline.
- Send a copy of the compliance statement and timeline to EPA
- If an NOV is issued for the SWPPP, the plan and review fee must be mailed to DEEP.
- Take pictures and submit as each violation is corrected
- SWPPP must be written and certified prior to application submittal





Non-Stormwater Discharges

- Non-stormwater discharges from sanitary wastes and pressure wash water originating from vessels are not authorized by this permit. The discharge of these waters is deemed under the Clean Water Act to be a <u>process wastewater</u> and must be collected and discharged to sanitary sewer under a separate permit or pumped and hauled by a licensed waste hauler.
- Pressure washing (or other means of washing) of boat bottoms to remove marine organisms produces wastewater contaminated with antifouling paints containing copper, tin, lead, zinc, and other heavy metals in concentrations that are harmful to the marine environment.



Employee Training

The permittee shall address, at a minimum, the following activities (as applicable):

used oil management	☐ fueling procedures			
☐ spent solvent management	☐ general good housekeeping practices			
disposal of spent abrasives	☐ painting and blasting procedures			
disposal of vessel wastewaters	☐ pressure washing procedures			
☐ spill prevention and control	engine maintenance and repair procedures			
☐ zinc anode disposal and used battery and management				



Additional Inspection Requirements

Inspect areas monthly:

- pressure washing area
- blasting, sanding, and painting areas
- ☐ material storage areas
- engine maintenance and repair areas
- material handling areas
- ☐ drydock area
- general yard area

Inspect at least quarterly and as necessary:

- □ stormwater management devices (e.g., oil and water separators sediment traps or chambers pressure wash collection systems)
- facility equipment and systems to uncover conditions that could cause breakdowns or failures resulting in discharges of pollutants to surface waters.





Additional Guidance

General Permit: Specific Sector Requirements -Section 5.(f)(8) Sector H

Connecticut Clean Marina Guidebook



The Connecticut Clean Marina Guidebook provides the information necessary for Connecticut's marina and boatyard operators to protect water and air quality. The operators of marinas, boatyards, and yacht clubs can use the CT Clean Marina Guidebook as a reference for the legal requirements and recommended practices for environmental operation at a marina. The Guidebook also outlines the requirements for certification as a CT Clean Marina.

The *Guidebook* is available for download in a PDF Format. You can access the entire document by choosing *CT Clean Marina Guidebook* in the list below or simply select an individual section. If you access the entire Guidebook, you can navigate easily between sections by choosing a section on the Bookmark column on the left.

CT Clean Marina Guidebook (entire copy of the document, PDF, 6.4MB)



STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



May 5, 2011

Best Management Practices (BMPs) for Discharges during the Maintenance and Operation of Recreational Vessels in Connecticut Waters

Throughout these Best Management Practices (BMPs) the term "minimize" means reduce and/or eliminate to the extent achievable using control measures (including best management practices) that are technologically available and economically practicable and achievable in light of best marine practice.

In addition to the BMPs listed below, the 2007 CT Clean Marina Guidebook is a useful resource for legal requirements and recommended practices for facilities to protect air and water quality.

General Requirements

Discharges must be associated with normal operation of a vessel; normal operation includes maintenance and cleaning activities including but not limited to winterization and commissioning, both in the water and on land, that are routinely conducted to ensure operability, functionality, and cleanliness of the vessel.

Materials or substances must not be added to any discharge that is not incidental to the normal operation of a vessel.

Discharges must not be diluted as a means to comply with the BMPs described below.

Discharges must not cause any visual indicator of constituents of concern or pollutants, such as foam, floating solids, or a visible sheen, which usually result from the presence of substances in the discharge including but not limited to trash or garbage, debris, oils, oily mixtures and surfactants.

Dispersants, cleaners, chemicals or other materials must not be applied to surface waters that would remove the appearance of a visible sheen.

Discharges must not contain substances or materials from releases or spills.

If oil or other harmful chemicals are discharged in a quantity that may be harmful as established under 40 CFR 110, 40 CFR 117, or 40 CFR 302, you must report the spill immediately to the National Response Center at 1-800-424-8802 or on the Center's website at www.nrc.uscg.mil.

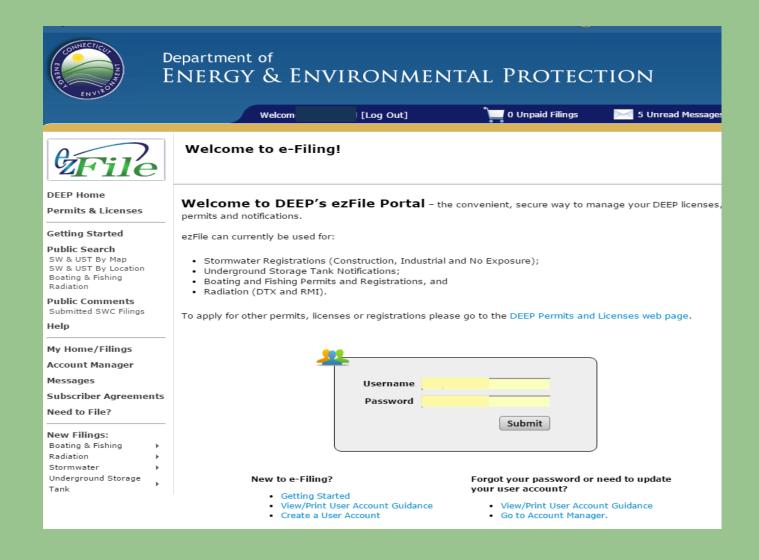
(Printed on Recycled Paper)
79 Elm Street • Hartford, CT 06106-5127

www.et.gov/dep
ffirmative Action/Equal Opportunity Employe





- What browser works the best?
- Who needs an account?



Go Paperless with DEEP's ezFile!

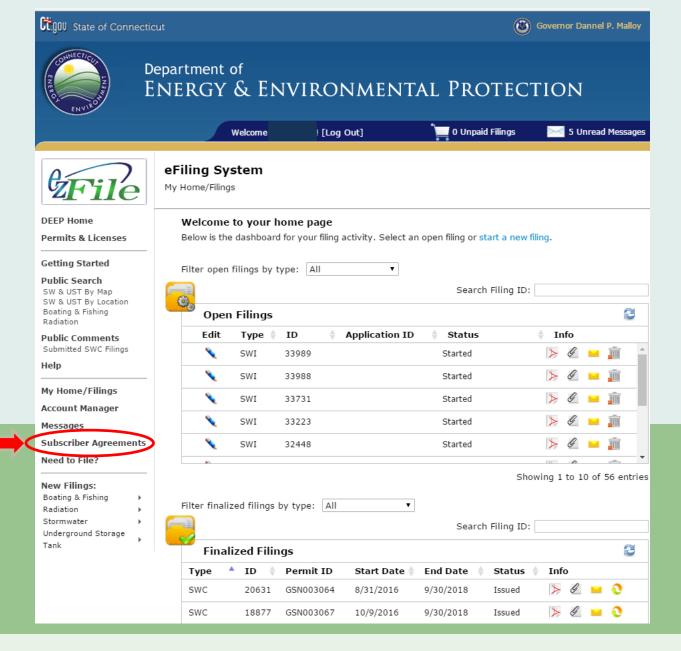


(https://filings.deep.ct.gov)

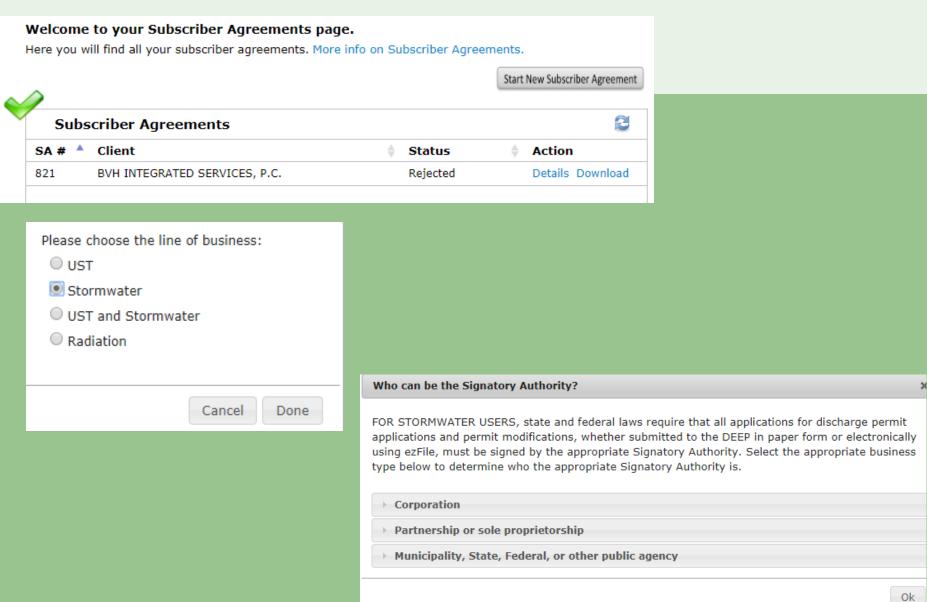
How to register using ezFile:

- Set up a User Account (<u>Instructions for creating a new account</u>)
 (Anyone who intends to prepare, review and/or submit a registration electronically within the ezFile portal must create an account.)
- Create a Subscriber Agreement (SA) electronically in ezFile. (Instructions for creating an SA)
- · Print Subscriber Agreement (SA).
- · Get "wet" signatures on Subscriber Agreement.
- · Send Subscriber Agreement by postal mail to DEEP and wait for email approval.
- Every person that will fill out, edit, review, certify, or submit an electronic filing must be identified and assigned a role. (<u>Instructions for Assigning User Roles</u>)
- Once you have received email approval of your SA, you can login to ezFile and complete a filing.
 Remember: ezFile has been optimized for Google Chrome.

If a registrant is not capable of submitting electronically, meaning that they do not have access to a computer, or if you have other questions or concerns regarding ezFile, please contact the stormwater group at 860-424-3025 or DEEP.StormwaterStaff@ct.gov









Who should be on a Subscriber Agreement?

The REGISTRANT (not the consultant)!

For a **corporation**: by a responsible corporate officer. For the purposes of this section, a responsible corporate officer means: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding twenty-five million dollars (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

For a partnership or sole proprietorship: by a general partner or the proprietor, respectively.

For a municipality, State, Federal, or other public agency: by either a principal executive officer or a ranking elected official. For purposes of this section, a principal executive officer of a federal agency includes (1) the chief executive officer of the agency, or (2) a senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency. If the facility is a POTW, the chairperson of the Water Pollution Control Authority may sign these documents.



Note: The selected client name must be an exact match of the client name listed within an associated filing as the Registrant/Billing Contact in order to submit that filing.

Enter Client (Regulated Entity) Name for search: energy Search Client Search Result Select Name EMCOR ENERGY SERVICES, INC. EMERA ENERGY 4 STATE OF CONNECTICUT DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION ENERGY AMERICA, LLC THE ENERGY CONSERVATION MANAGEMENT BOARD Please select a client from the table above Showing 1 to 130 of 150 entries If your client name does not show up in the search results, select the ADD NEW button to add your client Add New name. Selected Client: STATE OF CONNECTICUT DEPARTMENT OF ENERGY & ENVIRONMENTAL PROTECTION





Enter User Name (e-Filing login name):

Note: All necessary Signatory Authorities and/or Subscribers must first create a user account in order to be included on a Subscriber Agreement.

Users								
Select	Туре	User Name	First Name	Last Name	Email			
		N	o users found					
Add	Delete			Show	ing 0 to 0 of 0 entri			

Submit



Your Subscriber Agreement has been started for 22 ELM PLACE COMPANY LLC. The number is 2431.

For the signatory authority to obtain approval to use an electronic signature, a paper copy of a Subscriber Agreement must be completed, signed and returned to DEEP.

Please download the PDF and sign it.

Details on where to mail the document are included in the PDF instruction sheet.

Download PDF





Subscriber Agreement Instructions Page

Purpose

The CT DEEP Subscriber Agreement applies to all filings using an electronic signature, as an alternative to using paper forms to fulfill filing requirements for applicable Connecticut and federal law and regulations.

Basic Information on Who Should Fill Out the Subscriber Agreement

- To request use of Electronic Filing, the individual that is authorized to sign permit applications, permit
 modification requests, reports, and other documents on behalf of a regulated person pursuant to Chapters 445,
 446c and 446k of the Connecticut General Statutes and the regulations promulgated thereunder must sign the
 Subscriber Agreement as the Signatory Authority in Section D.
- The Signatory Authority (named in Section D) will also have the authority to sign and submit Electronic Filings
 (as defined in the Subscriber Agreement); this individual must also sign as the Subscriber (named in Section E). If
 there is more than one Signatory Authority, then each Signatory Authority must sign a separate Subscriber
 Agreement.
- If the Signatory Authority plans to have other individual(s) sign and submit the Electronic Filings (as defined in the Subscriber Agreement), then each such other individual(s) must sign as the Subscriber (see Section E and below). Note, however, that for some regulatory programs, only an individual who is also qualified to be a Signatory Authority may sign Electronic Filings. See, e.g., RCSA § 22a-430-3(b)(2) (distinguishing who, on behalf of a corporation, may sign permit applications from those who may sign reports (a responsible corporate officer must sign a permit application or modification; a duly authorized individual, in addition to a responsible corporate officer, may sign reports)).
- If the authority to sign an Electronic Filing (as defined in the Subscriber Agreement) is to be delegated to multiple Subscribers, then each Subscriber must submit and sign a separate Section E of the Subscriber Agreement.

Where to Submit

PRINT AND MAIL THE ORIGINAL completed CT DEEP Subscriber Agreement below to your ePermitting authority for their review at the address below. Save a copy for your records.

Connecticut Department of Energy and Environmental Protection Bureau of Materials Management and Compliance Assurance Water Permitting and Enforcement Division 79 Elm Street, Hartford, CT 06106-5127

Questions?

For help or questions, please contact DEEP.StormwaterStaff@ct.gov or call (860) 424-3025. You will receive a confirmation email when your application has been processed and approved. Thank you for helping us reduce paper use by choosing to electronically submit your filing.

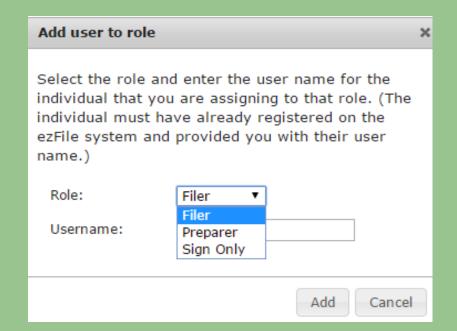




Selected Line of

Assigning Roles

- How do I add additional users to a filing?
- Each user needs a role.
- Each user can only be assigned one role.





eFiling System

Home > SWI Notification

Overview Form Info Attach Submit Pay

Let's begin a new SWI Registration application

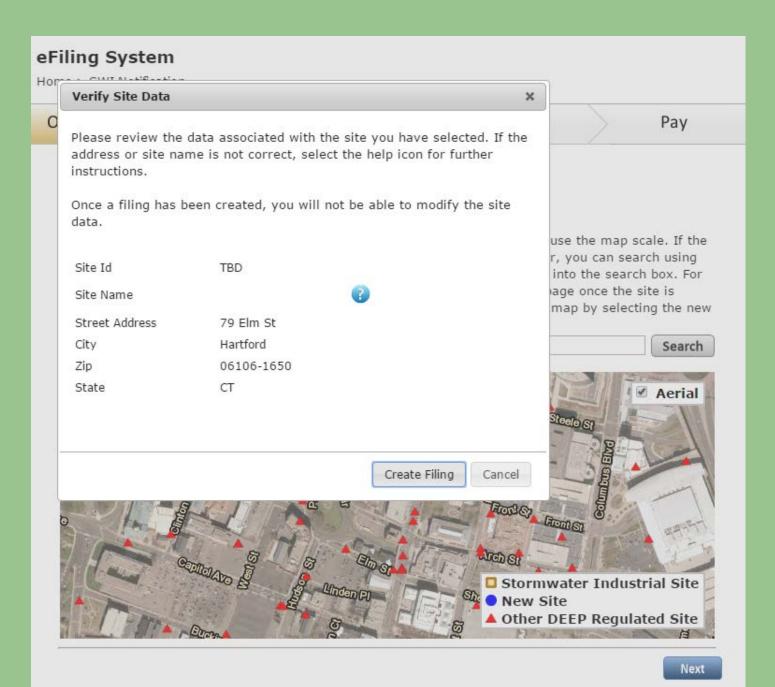
We will guide you through submitting the form.

Locate your site on the map. To zoom in on the map, enter a site zip code or use the map scale. If the site is an existing industrial activity with an already designated permit number, you can search using that number. DO NOT ENTER the prefix "GSI" when entering a permit number into the search box. For any permitted DEEP site, more information will be provided on the following page once the site is selected. If this is a new stormwater industrial site, add a new marker to the map by selecting the new point of your site. When done, select "Next" to continue.

Search by:
Address Coordinates 79 Elm St, Hartford, CT, 06106, USA

Search

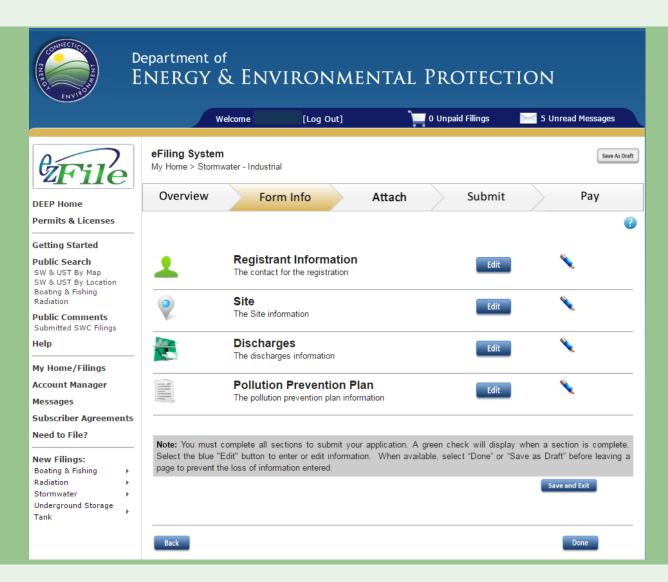




eFiling System

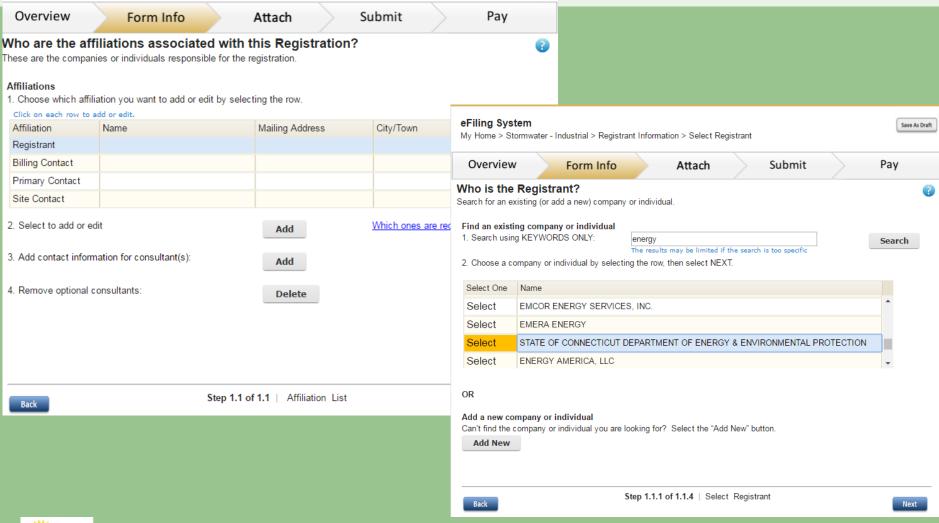
My Home > Stormwater - Industrial > Site Details

Overview Form Info Attach Submit Pay Enter the site information 8 Please verify the information below is complete. What is the name of the site? What is the street address? 79 Elm St Or... What is the site description? City/Town? Hartford State? CT ▼ Zip code? 06106 1650

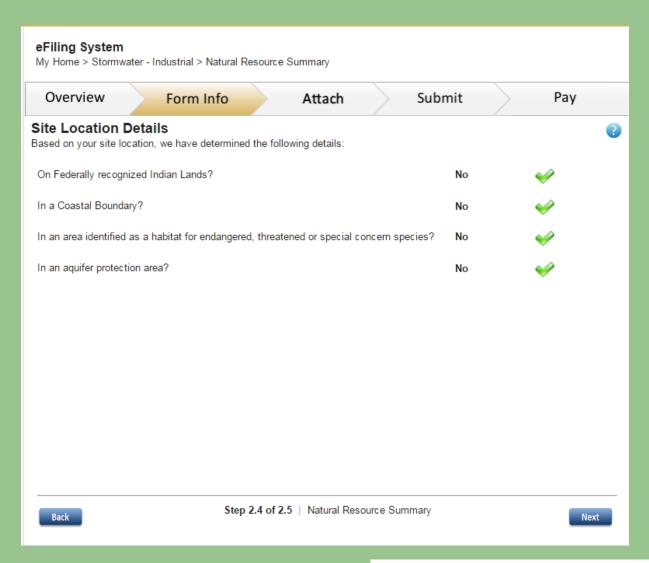




Registrant Information









What is the location of the discharge? Use the map to select the location of the discharge.



Note: If you know the latitude and longitude of a discharge, click in th longitude location on the next page.

Back

Step 3.1.1 of 3.1.3 | Di

Dis To what system or receiving water does your stormwater runoff discharge?

Select the type of the conveyances, outfall or channelized flow?

What is the discharge number?

Back

Pipe

Swale

Other

Storm Sewer System (MS4) or Wetlands

Waterbody

eFiling System

My Home > Stormwater - Industrial > Discharges > Waterbody Map

Overview Form Info Attach Submit Pay

What water body does the discharge lead to?

Use the map to identify which water body the discharge goes.



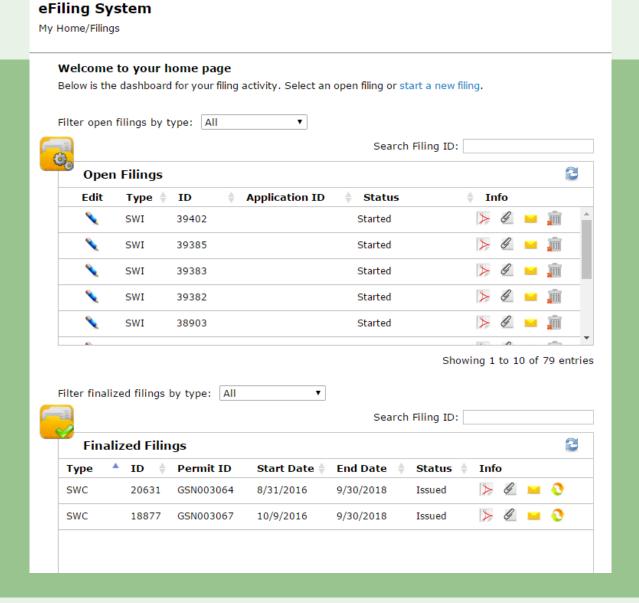


ezFile Payment Options



- Credit card
- Check
- Pay Later (30 days)







Questions?

Karen Abbott 860-424-4038 karen.abbott@ct.gov

Donna Seresin 860-424-3267 donna.seresin@ct.gov

Carol Papp 860-424-3908 carol.papp@ct.gov

For questions related to: Impaired water monitoring, exemptions, & SMR forms

Marshall Hoover 860-424-3821 Marshall.hoover@ct.gov

For questions related to wastewater discharges

Link to stormwater page SWPPP guidance & permits: www.ct.gov/deep/stormwater

