

Monitoring and Reporting for EPA's 2008 MSGP



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Topics for Today's Webcast

- Preparation for Monitoring
- General Monitoring Procedures
- 2008 MSGP - Types of Monitoring
- Select Sampling Team/Lab and Conduct Monitoring
- Evaluate Monitoring Results
- Reporting Your Monitoring Results
- Annual Reporting and Additional Reports

What is the 2008 MSGP?

- Multi-Sector General Permit (MSGP)
 - Also known as the Industrial Stormwater General Permit
 - First issued by EPA in 1995, reissued in 2000
 - MSGP 2000 expired in October 2005
 - Current version issued Sept. 29, 2008
 - Covers 29 “sectors” of industrial activity
 - Only applies in a few states, territories, Indian Country lands
 - www.epa.gov/npdes/stormwater/msgp

November 2008 webcast

Event Console (EVENT: 123869) - Windows Internet Explorer
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EPA's New Industrial Stormwater Permit: What You Need to Know about the MSGP

Wednesday, November 5, 2008
Eastern: 12:00 pm / Central: 11:00 am
Mountain: 10:00 am / Pacific 9:00 am

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EPA's New Industrial Stormwater Permit

What You Need to Know About the 2008 MSGP



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 SEARCH RESUME 2008 MSGP Overview

www.epa.gov/npdes/training

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Now Available: EPA's Industrial SWPPP Guide

Downloadable at:
www.epa.gov/npdes/stormwater/msgp



EPA 833-B-09-002



Developing Your Stormwater Pollution Prevention Plan

A Guide for Industrial Operators

February 2009



EPA's Industrial Stormwater Monitoring and Sampling Guide

Downloadable at
[www.epa.gov/npdes/
stormwater/msgp](http://www.epa.gov/npdes/stormwater/msgp)

Three key steps:

- Prepare for monitoring
- Conduct monitoring
- Evaluate monitoring results



EPA XXX-X-XX-XXX



Industrial Stormwater Monitoring and Sampling Guide

March 2009



Preparation for Monitoring



MSGP Industrial Stormwater/Snowmelt Monitoring Summary Form

Name of Facility: <i>Acme Industrial</i>						Pollutants to sample (Method)					
Address: <i>111 Main Street Springfield</i>											
Permit Tracking Number: <i>54XX012345</i>											
Benchmark Levels and ELGs											
Industry Sector	Pollutant	Benchmark Level	ELG								
			Daily Max	Monthly Average	Instant Min/Max						
<i>D</i>	<i>TSS</i>	<i>100</i>	<i>23</i>	<i>15</i>							
<i>D</i>	<i>Oil and Grease</i>		<i>15</i>	<i>10</i>							
<i>D</i>	<i>pH</i>						<i>6 - 9</i>				
<i>E2</i>	<i>Iron</i>	<i>1</i>									
<i>E2</i>	<i>TSS</i>	<i>100</i>	<i>50</i>								
<i>E2</i>	<i>pH</i>						<i>6 - 9</i>				
Sample Summary											
Outfall Identifier	Industry Sector (SIC)	Basis	Frequency	Timing							
<i>e.g. 001-A</i>	<i>Sector D (SIC 2951)</i>	<i>Benchmark</i>	<i>1/Quarter</i>	<i>1st wk of month</i>	<i>x</i>	<i>x</i>	<i>x</i>				
<i>e.g. 001-A</i>	<i>Sector D (SIC 2951)</i>	<i>ELG</i>	<i>1/year</i>	<i>January</i>	<i>x</i>						
<i>e.g. 001-B</i>	<i>Subsector E2 (SIC 3271)</i>	<i>Benchmark</i>	<i>1/Quarter</i>	<i>1st wk of month</i>	<i>x</i>				<i>x</i>		
<i>e.g. 001-B</i>	<i>Subsector E2 (SIC 3271)</i>	<i>ELG</i>	<i>1/Year</i>	<i>January</i>	<i>x</i>	<i>x</i>					

Determine Discharge Points

- Where does stormwater discharge from your facility?
 - Ditch, pipe, catch basin, dispersed runoff, etc.
- Walk around your facility during a rain event
 - Where does stormwater leave your facility?
 - Is stormwater runoff entering your facility from a neighboring property?

Determine Sampling Locations

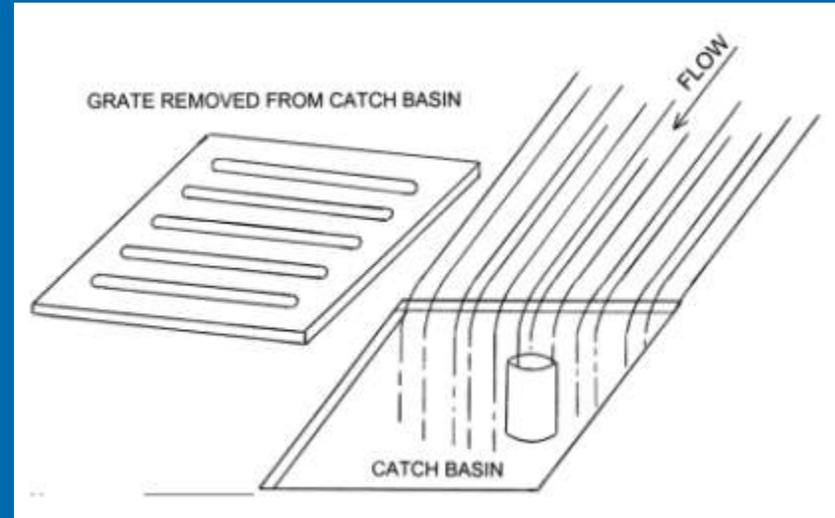
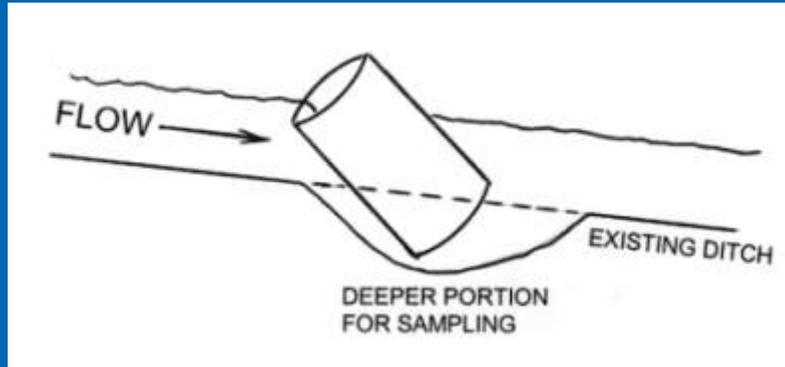
- Where will you collect samples?
 - Sample stormwater prior to leaving your facility, if possible, and downstream from all industrial materials and activities
- Typical sampling points include:
 - End of a pipe (outfall)
 - An open ditch or channel
 - A catch basin or manhole



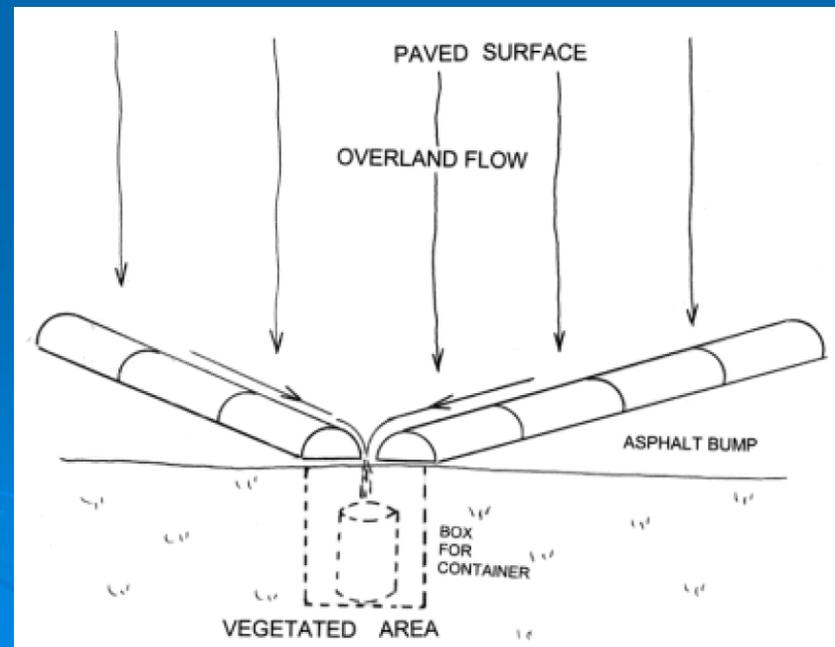
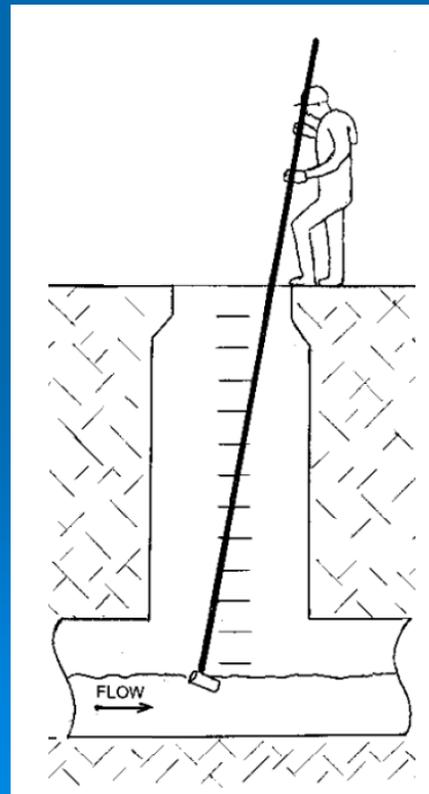
How to Collect a Sample

- Sampling sheet flow
 - Try to concentrate sheet flow using berms or gutters; dig a small depression to collect stormwater
- Sampling from a pipe
- Sampling from a ditch or swale
- Sampling from a basin
- Sampling from a manhole

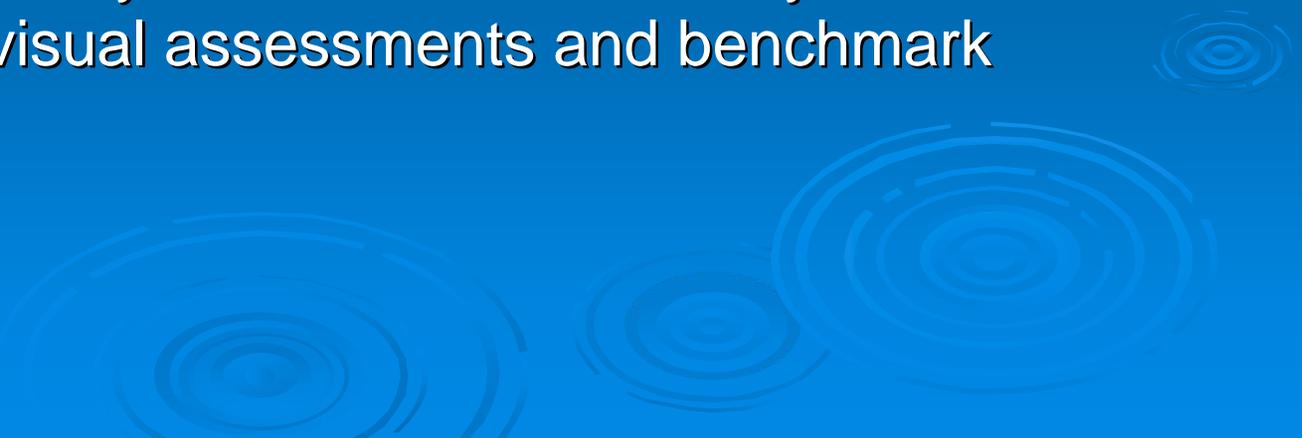
Example sample locations



From:
[www.ecy.wa.gov/
pubs/0210071.pdf](http://www.ecy.wa.gov/pubs/0210071.pdf)



Sampling multiple discharge points

- Can stormwater runoff be diverted or channeled to reduce the number of outfalls?
 - Substantially identical outfalls
 - Must have similar industrial activities and control measures, exposed materials, and runoff coefficients
 - Can sample only one of the substantially identical outfalls for visual assessments and benchmark monitoring
- 

Potential sampling issues

- Run-on from neighboring properties
- Industrial stormwater co-mingles with stormwater from non-industrial areas
- Adverse weather conditions
- Inaccessible outfalls
- Too many outfalls
- Sampling from a manhole
- Stormwater from more than one industry type is commingled

General Monitoring Procedures



Monitoring Periods

- Not all permittees are required to monitor.
- If you are required to monitor, monitoring requirements commence the first full quarter beginning on either April 1, 2009 or your date of discharge authorization
- Quarterly monitoring must be conducted at least once in each of the following 3-month intervals
 - January 1 – March 31
 - April 1 – June 30
 - July 1 – September 30
 - October 1 – December 31
- Facilities in climates with irregular stormwater runoff may modify the monitoring schedule if the schedule is documented in the SWPPP and submitted to EPA in the first monitoring report

Monitoring Procedures

- No monitoring required prior to April 1, 2009
- All sample results can be reported on-line
 - Use the e-NOI system to report (7.1)
 - Available April 1, 2009
- Use Part 136 analytical methods (6.2)
- If same parameter must be sampled for 2 different monitoring requirements (e.g., benchmark and effluent guideline), permittee can use a single sample to satisfy requirements (6.2)
- Monitored Outfalls (6.1.1)
 - Monitor each outfall (unless designated as “substantially identical outfall”)
 - Collect stormwater sample at any point discharge that leaves the facility

Types of Storm Event to Sample

➤ Measurable Storm Events (6.1.2)

- Take samples only for storm event with actual discharge (“measurable storm event”) and that follows preceding event by at least 3 days (72 hours)
- For each storm event sample, identify date and duration (in hours), total amount (in inches), and time since the previous measurable storm event
- For any snowmelt samples, identify the date of the sampling event

Sample Type

- Sample Type
 - Grab samples from discharge within first 30 minutes of measurable storm event (or as soon as practicable thereafter)
- Adverse Weather Conditions
 - If adverse weather prevents sampling, take substitute sample during the next qualifying storm event
- Irregular Stormwater Runoff
 - If limited rainfall occurs during periods of the year, redistribute sampling events so that they occur in times of the year when precipitation occurs



2008 MSGP

Types of Monitoring



What Monitoring Requirements Apply

- What monitoring requirements apply to each outfall?
 - Visual assessments (applied to all facilities)
 - Benchmark/effluent limitations monitoring
 - State/tribal monitoring
- Are you subject to impaired waters monitoring requirements?
 - Identify your receiving waters
 - Is water impaired and has a TMDL been completed?
 - What monitoring requirements apply?

Quarterly visual assessments

- Required of all permittees once each quarter for entire permit term
- Visual assessment of stormwater sample from each outfall, except for:
 - Adverse weather conditions
 - Climates with irregular stormwater runoff
 - Areas subject to snow
 - Inactive/unstaffed sites
 - Substantially identical outfalls

Benchmark Monitoring

- Refer to Part 8 (sector requirements) to determine whether benchmark monitoring is required for your subsector (6.2.1)

Subsector (You may be subject to requirements for more than one sector/subsector)	Parameter	Benchmark Monitoring Concentration
Subsector C1. Agricultural Chemicals (SIC 2873-2879)	Nitrate plus Nitrite Nitrogen	0.68 mg/L
	Total Lead ¹	Hardness Dependent
	Total Iron	1.0 mg/L
	Total Zinc ¹	Hardness Dependent
	Phosphorus	2.0 mg/L
Subsector C2. Industrial Inorganic Chemicals (SIC 2812-2819)	Total Aluminum	0.75 mg/L
	Total Iron	1.0 mg/L
	Nitrate plus Nitrite Nitrogen	0.68 mg/L
Subsector C3. Soaps, Detergents, Cosmetics, and Perfumes (SIC 2841-2844)	Nitrate plus Nitrite Nitrogen	0.68 mg/L
	Total Zinc ¹	Hardness Dependent
Subsector C4. Plastics, Synthetics, and Resins (SIC 2821-2824)	Total Zinc ¹	Hardness Dependent

Benchmark Monitoring

- Required to start quarterly monitoring in 1st year of permit coverage (6.2.1.2)
 - If authorized prior to April 1, 1st quarter begins April 1, 2009
 - If authorized after April 1, 1st quarter begins in first full quarter
- Monitoring required quarterly for 4 quarters (with allowance for modifying schedules in areas with irregular precipitation) (6.2.1.2)
 - Exception for inactive and unstaffed sites (6.2.1.3)

Benchmark Monitoring - Hardness

- Benchmarks for six hardness-dependent metals depend on receiving water hardness
 - Cadmium, copper, lead, nickel, silver, zinc
- Three methods to determine hardness:
 - Permittee samples receiving stream hardness
 - Group monitoring for receiving stream hardness
 - Use of third-party hardness data
- See Appendix J of 2008 MSGP

Effluent Limitation Guidelines Monitoring

- Applies only to sectors with applicable effluent limitation guidelines (ELGs) (6.2.2.1)
 - Sectors A, C, D, E, J, K, L, and O
- Monitoring required once per year at each outfall (6.2.2.1)
 - No allowance for substantially identical outfall

State or Tribal-specific Monitoring

- Some States and Tribes require additional monitoring for permittees (6.2.1)
 - See Part 9 to determine if applicable State/Tribal requirements
- For example, the State of Massachusetts includes additional sector-specific requirements:
 - Sector Q: copper and tributyltin
 - Sector R: aluminum, iron, lead, copper and tributyltin
 - Sectors Q and R: benchmark for tributyltin is 0.42 ug/l (acute saltwater criteria); report any exceedances of that value
 - All four of the quarterly monitoring samples must meet the benchmarks rather than the average of the four before no further monitoring is required

Impaired Waters Monitoring

- Monitor for all pollutants listed as cause of impairment (and for which a Part 136 analytical method exists) (6.2.4.1)
 - Exceptions: biological impairment without indicator/surrogate pollutant, hydrological modification, or temperature
- If no approved/established TMDL, monitor annually at each outfall (excluding substantially identical outfalls) (6.2.4.2)
 - Discontinue after 1 year if pollutant:
 - Not detected above natural background levels
 - Not present and not expected to be present in discharge
 - Present, but caused solely by natural background sources
- If TMDL has been approved/established, no monitoring required until EPA notifies facility of specific requirements

Select Sampling Team/Lab and Conduct Monitoring



Select Monitoring Team / Lab

- Who will collect samples?
 - Identify your monitoring team
- What laboratory will analyze the samples?
 - Labs can provide assistance, sampling bottles, forms, etc.

Selecting a Lab

- Recommend selecting lab that is a participant in EPA's Discharge Monitoring Report – Quality Assurance (DMRQA) Program
- Issues to discuss with the lab:
 - Type and size of bottles
 - How to fill the bottles
 - Labels and forms
 - Sample preservation and holding times
 - How to deliver the sample to the lab
 - Costs

What to Have in Place Prior to Monitoring

- Have everything ready for the storm
 - Create a checklist for stormwater monitoring
 - Prepare sampling supplies
 - Sample bottles
 - Forms/field notebook
 - Coolers/ice if necessary
 - Rain gear



Conduct Monitoring

➤ Collect samples

- Sample stormwater discharging from your facility (don't sample puddles, ponds, etc)
- Use a sample bottle to collect the stormwater discharging from facility
- Sample from the turbulent section in the central part of the flow – avoid touching the bottom or sides of the stormwater conveyance
- Fill the sample bottle nearly to the top by holding the opening into the flow of water; do not rinse or overfill the bottles
- Fill sample bottles according to lab direction
- Follow sample preservation as directed by lab



MSGP Industrial Stormwater/Snowmelt Discharge Collection Form

Name of Facility:					Type of Analyses Required										Sample Collection Information			
					Preservative (Y/N)	Number of Containers												
Date & Time Sample Collection Ended (if different):																		
Address:																		
Person(s)/Title(s) collecting sample:																		
Permit Tracking Number:																		
Outfall Numbers/Sample Locations:																		
Discharge Information																		
Nature of Discharge (circle one): Rainfall or Snowmelt																		
Rainfall Amount (inches):																		
Date of Discharge Sampling:																		
Date & Time Storm Began:																		
Date & Time Storm Ended:																		
Date & Time of Previous Measurable Storm Event:																		
Shaded area for laboratory use only																		
Date	Time	Sample Identification/Outfall													Collection Method	Laboratory Log Number		
Sampled by: <i>(signature)</i>			Date/Time:		Relinquished by: <i>(signature)</i>			Date/Time:		Received by: <i>(signature)</i>			Date/Time:					
Received by: <i>(signature)</i>			Date/Time:		Received by: <i>(signature)</i>			Date/Time:		Received by: <i>(signature)</i>			Date/Time:					

The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.

Quality Assurance Considerations

- Consider sample preservation and holding times for each parameter
 - Parameter with shortest holding time will dictate when samples must get to lab
- Complete chain of custody forms
 - Critical to ensure no tampering occurs between sample collection and analysis
 - Discuss with lab

Conducting Visual Assessments

- Quarterly Visual Assessments of stormwater discharges
- Collect sample in a clean, clear glass or plastic container
- Assess general appearance of sample:
 - Color
 - Odor
 - Clarity
 - Floating Solids
 - Settled Solids
 - Suspended Solids
 - Oil Sheen
 - Foam
 - Other obvious indicators



MSGP Quarterly Visual Assessment Form

(Complete a separate form for each outfall you assess)

Name of Facility:		Permit No.:	
Street Address:		City:	State: Zip Code:
Outfall Number:	"Substantially Identical Outfall"? <input type="checkbox"/> No <input type="checkbox"/> Yes (identify substantially identical outfalls): _____		
Quarter/Year:	Substitute Sample?: <input type="checkbox"/> No <input type="checkbox"/> Yes (identify quarter/year when sample was originally scheduled to be collected): _____		
Person(s)/Title(s) collecting sample:			
Person(s)/Title(s) examining sample:			
Date & Time Storm or Snowmelt Began:	Date & Time Sample Collected: _____	Date & Time Sample Examined: _____	
Nature of Discharge: <input type="checkbox"/> Rainfall <input type="checkbox"/> Snowmelt			
Rainfall Amount: _____ inches	Previous Storm Ended > 72 hours Before Start of This Storm? <input type="checkbox"/> Yes <input type="checkbox"/> No* (explain): _____		
Parameter			
Color	<input type="checkbox"/> None <input type="checkbox"/> Other (describe): _____		
Odor	<input type="checkbox"/> None <input type="checkbox"/> Musty <input type="checkbox"/> Sewage <input type="checkbox"/> Sulfur <input type="checkbox"/> Sour <input type="checkbox"/> Petroleum/Gas <input type="checkbox"/> Solvents <input type="checkbox"/> Other (describe): _____		
Clarity	<input type="checkbox"/> Clear <input type="checkbox"/> Slightly Cloudy <input type="checkbox"/> Cloudy <input type="checkbox"/> Opaque <input type="checkbox"/> Other (describe): _____		
Floating Solids	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe): _____		
Settled Solids**	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe): _____		
Suspended Solids	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe): _____		
Oil Sheen	<input type="checkbox"/> None <input type="checkbox"/> Flecks <input type="checkbox"/> Globs <input type="checkbox"/> Sheen <input type="checkbox"/> Slick <input type="checkbox"/> Other (describe): _____		
Foam (gently shake sample)	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe): _____		
Other Obvious Indicators of Storm Water Pollution	<input type="checkbox"/> No <input type="checkbox"/> Yes (describe): _____		

* The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.

Evaluate Monitoring Results



Evaluate Monitoring Results: Quarterly visual assessments

- Evaluate visual assessment results
 - What is contributing to the contamination?
 - Assess SWPPP and review industrial activities and materials that may be a source of the contamination
 - For example, high suspended solids can indicate a need for more sweeping
 - Take corrective action to address contamination

Evaluate Monitoring Results: Benchmarks

➤ Evaluate benchmark results

- Did any of your sample results exceed benchmark values?
- If yes, was the exceedance by a large enough margin that would suggest a pollutant “hot spot” at your site?
 - Pinpoint the “hot spot” and evaluate whether current control measures need to be modified to minimize discharge of pollutants

Benchmark Results

- Compare average of 1st year samples to applicable benchmark
 - If average does not exceed benchmark, no further monitoring is required for that pollutant (6.2.1.2)
 - If exceedance is mathematically certain before the completion of the 4 quarters, permittee required to investigate immediately (6.2.1.2)

Benchmark Exceedances

- If average of 4 samples exceeds benchmark, review control measures, and either:
 - (1) Modify control measures and continue quarterly monitoring until average of 4 additional samples is less than benchmark, or
 - (2) Determine that no further reductions are technologically available and economically practicable and achievable in light of best industry practice, and continue to monitor once per year (6.2.1.2)

- Natural background exception
 - If benchmark exceedance caused solely by natural background levels of pollutant, no more benchmark monitoring is required for permit term (6.2.1.2)

Evaluate Monitoring Results: Effluent Limitation Samples

- If you exceed a numeric effluent limit:
 - Resample within 30 calendar days of implementing corrective action, and
 - Continue sampling quarterly until your discharge complies with the effluent limit
- Within 24 hours of receiving lab results, document the date and in your records the exceedance (Questions 3-5 of Annual Report Form) summary of exceedance, including date
- Within 14 days, document (Questions 7-11 of Annual Report Form):
 - Summary of corrective action taken
 - Whether control measures were modified
 - Date corrective action was initiated and completed
- Within 30 days of receiving lab results, submit an exceedance report to EPA within 30 days

Question and Answer Break



Reporting Your Monitoring Results



Reporting Monitoring Data to EPA

- Monitoring data must be submitted to EPA no later than 30 days after receiving complete lab results for all monitored outfalls
- EPA strongly prefers that data be submitted electronically using eNOI system
- Data can still be submitted in paper form using MSGP DMR form (MDMR form)
 - www.epa.gov/npdes/pubs/mdmr.pdf

What Information You Need for Reporting

- Permit tracking number
- A copy of your SWPPP
 - No. of Outfalls, substantially identical outfalls, alt. monitoring periods
- Monitoring records
 - Dates, duration/amount of event, days since previous event
- Lab reports
 - Measured concentration, below quantitation limit or not detected?
- Corrective actions
 - Explanation of cause and corrective actions taken

Reporting in eNOI



- www.epa.gov/npdes/eNOI
- Reporting in eNOI available on March 30, 2009
- Reporting in eNOI available to registered users who have a certified 2008 MSGP NOI in eNOI
- Monitoring data must be certified to be submitted to EPA (similar to NOI certification)

Applications Assigned to you or Results of Search

Use this section to complete any draft forms you have saved, certify any submitted forms (if you are a certifying official), view or edit any existing forms, terminate permit coverage, or apply for coverage under a new permit using some of the data from an existing NOI.

Please select the action you'd like to take from the drop-down list in the "Action" column and hit "GO" to proceed.

Tracking Number	NOI Submitted Date	Date of Coverage	Application Type	Owner/Operator Name	Project/Site Name	Project City	Project State	Status	Actions
MAR05A043	02-16-2009	02-16-2009	MSGP	OUTERMOST HARBOR MARINE LLC	OUTERMOST HARBOR MARINE LLC	CHATHAM	Massachusetts	Active	<input type="text" value="Go to Reporting"/> <input type="button" value="Go"/>
NHR05A036	02-16-2009	02-16-2009	MSGP	TOWN OF DUBLIN	DUBLIN TRANSFER STATION	DUBLIN	New Hampshire	Active	<input type="text"/> <input type="button" value="Go"/>

Screen shot for presentation purposes only and does not reflect actual stormwater data.

Reporting in eNOI includes:

- Submitting discharge monitoring data
- Uploading additional reports submitted to EPA Headquarters
- Changing site status (Active/Inactive)

U.S. Environmental Protection Agency

Electronic Notice of Intent
Online Stormwater Application

HOME
HELP
PROFILE
LOGOUT

Reporting

Reporting Home

The Reporting section allows you to...

- [Submit Discharge Monitoring Data / No Discharge](#)
- [Change Outfall Information](#)
- [Change Site Status Active vs. Inactive](#)
- [Upload Reports](#)
- [View Monitoring Data Status](#)
- [Certify](#) *(If you are ready to review and certify information, click on the "Certify" link.)*

Tips

- Who must report discharge monitoring data?
- How can I report discharge monitoring data?
- What data/information can I report?
- Who can certify the discharge monitoring data?
- Industrial stormwater permit website
- Before you begin - Reporting
- Who do I contact for assistance with entering discharge monitoring data?
- How do I change my account information?

EPA U.S. Environmental Protection Agency

Submitting discharge monitoring data

- Sector-specific requirements will be pre-populated
- Ability to include additional parameters as required

Reporting

Discharge Information
Monitoring Information

Monitoring Information

Please do not include ampersands, semicolons, single apostrophes or quotation marks when you are filling out the forms; these values will automatically be removed.

Please note that the system automatically populates: "Outfall Name", "Parameter Name", "Type of Monitoring" and "Unit" based on your MSGP permit requirements.

If you need to enter additional parameters click "Add Parameter" in the lower left corner of the screen.

Outfall Name	Parameter Name	Type of Monitoring	Result Description	Result Value	Unit	Collection Date (mm/dd/yyyy)
2	Total Aluminum	Benchmark	Detected	<input type="text"/>	mg/L	<input type="text"/>
2	Total Iron	Benchmark	Detected	<input type="text"/>	mg/L	<input type="text"/>
2	Total Lead	Benchmark	Detected	<input type="text"/>	mg/L	<input type="text"/>
2	Total Suspended Solids (TSS)	Benchmark	Detected	<input type="text"/>	mg/L	<input type="text"/>
2	Total Zinc	Benchmark	Detected	<input type="text"/>	mg/L	<input type="text"/>
2	pH	Effluent Limit	Detected	<input type="text"/>	su	<input type="text"/>
2	<input type="text"/> Click to search via EPA's centralized chemical catalog.	Benchmark Effluent Limit State/Tribal Specific	Detected	<input type="text"/>	<input type="text"/>	<input type="text"/>

Add Parameter

Previous
Save
Cancel

If you have questions about the eNOI system, please contact the EPA's NOI Processing Center using one of the following options:

- By Telephone: Person-to-person telephone support is available from 8:00 am to 5:00 pm (EST). Call our toll-free line at 866-352-7755.
- By Webform: Fill out the online form at www.epa.gov/npdes/noicontact
- By E-mail: Send an e-mail to Technical Support at noi@avanticorporation.com

Public NOI search site:

www.epa.gov/npdes/noisearch

- View NOIs and additional reporting information submitted to EPA

MSGP Discharge Monitoring (MDMR) Form

C. Discharge Information

1. Identify monitoring period: Check here if proposing alternative monitoring periods due to irregular stormwater runoff. Identify alternative monitoring schedule and indicate for which alternative monitoring period you are reporting monitoring data:
- Quarter 1 (April 1 – June 30) Quarter 1: From / To /
- Quarter 2 (July 1 – September 30) Quarter 2: From / To /
- Quarter 3 (October 1 – December 31) Quarter 3: From / To /
- Quarter 4 (January 1 – March 31) Quarter 4: From / To /
2. Are you required to monitor for cadmium, copper, chromium, lead, nickel, silver, or zinc? Yes (Complete line item 2.a.) No (Skip to Section D)
- 2a. What is the hardness level of the receiving water? mg/L

D. Outfall Information

1. How many outfall(s) are identified in your SWPPP? List name of outfall(s) required to be monitored in table below.
2. Do any of your outfalls discharge substantially identical effluents? YES NO
- 2.a. If yes, for each monitored outfall, indicate outfall names that are substantially identical in table below.

3.A. Monitored Outfall Name*	3.B. Substantially Identical Outfalls [List name(s) of outfall(s) substantially identical to outfall in 3.A. (if applicable)]	3.C. No Discharge?
		<input type="checkbox"/>
		<input type="checkbox"/>
		<input type="checkbox"/>

Annual Reporting and Additional Reports



Annual Report

- All permittees must submit an Annual Report to EPA (7.2)
 - Must be sent within 45 days (postmark date) after conducting the comprehensive site inspection
- Each annual report must include:
 - Findings from the facility's comprehensive site inspection (4.3)
 - Summaries of corrective actions taken during the year (3.4)
- Permittees should use Annual Reporting Form provided in Appendix I of the permit
- The annual report form can be found at www.epa.gov/npdes/stormwater/msgp

Comprehensive Site Inspections and the Annual Report

- Minimum requirements (4.3.1):
 - Conduct annually
 - Performed by qualified personnel with at least one on SWPPP team
 - Include all areas of facility affected by permit
 - Must include review of any monitoring data
 - Inspectors must examine:
 - Industrial materials that could contact stormwater
 - Leaks or spills
 - Tracking/blowing of industrial materials or sediment
 - Controls needing replacement, maintenance or repair
- The documented findings (4.3.2) must be submitted in the annual report to EPA (7.2)

Corrective Actions and the Annual Report

- Two conditions requiring corrective action:
 - Permit violation (3.1)
 - Indication of a potential problem (3.2)
- Actions taken in response to “triggering conditions”
 - Investigate problem
 - Document problem and actions to be taken
 - Modify control measures to prevent recurrence
- Summaries of corrective actions must be submitted in the annual report to EPA (7.2)

Completing the Annual Reporting Form – General Inspection Findings

- Did you inspect all potential pollutant sources?
- Any new outfalls not previously in SWPPP?
- Any new discharges not previously in SWPPP?
- Review stormwater monitoring data to identify potential pollutant hot spots?
- Evidence of pollutant discharges and condition of outfalls
 - The Center for Watershed Protection's Outfall Reconnaissance Inventory (ORI) tool can assist in inspecting outfalls and documenting findings
 - The ORI tool can be found in the IDDE Manual at www.epa.gov/npdes/stormwater/idde

Completing the Annual Reporting Form – Section C (Industrial Activity Area Specific Findings)

C. INDUSTRIAL ACTIVITY AREA SPECIFIC FINDINGS

Complete one block for each industrial activity area where pollutants may be exposed to stormwater. Copy this page for additional industrial activity areas.

In reviewing each area, you should consider:

- Industrial materials, residue, or trash that may have or could come into contact with stormwater;
- Leaks or spills from industrial equipment, drums, tanks, and other containers;
- Offsite tracking of industrial or waste materials from areas of no exposure to exposed areas; and
- Tracking or blowing of raw, final, or waste materials from areas of no exposure to exposed areas.

INDUSTRIAL ACTIVITY AREA _____:

1. Brief Description:

2. Are any control measures in need of maintenance or repair? YES NO

3. Have any control measures failed and require replacement? YES NO

4. Are any additional/revised control measures necessary in this area? YES NO

If YES to any of these three questions, provide a description of the problem: (Any necessary corrective actions should be described on the attached Corrective Action Form)

- Complete for each industrial activity area where pollutants are exposed to stormwater
- Describe area, activity, control measures that need maintenance or have failed, or additional control measures

Completing the Annual Reporting Form – Section D (Corrective Actions)

- For each corrective action:
- Identify the conditions triggering the need for review
 - Describe the problem
 - Identify the date of the problem
 - Summarize the corrective action taken or plan to be taken
 - Indicate if SWPPP modifications are required
 - Identify date corrective action initiated
 - Identify date corrective action completed or expected to be completed
 - Provide status of the corrective action if not completed

2. Is this corrective action:

- An update on a corrective action from a previous annual report; or
- A new corrective action?

3. Identify the condition(s) triggering the need for this review:

- Unauthorized release or discharge
- Numeric effluent limitation exceedance
- Control measures inadequate to meet applicable water quality standards
- Control measures inadequate to meet non-numeric effluent limitations
- Control measures not properly operated or maintained
- Change in facility operations necessitated change in control measures
- Average benchmark value exceedance
- Other (describe): _____

4. Briefly describe the nature of the problem identified:

Additional Reporting

- The following reports must be submitted to the appropriate EPA Regional Office. Additionally if you discharge through an MS4, these reports must be submitted to the MS4 operator.
 - 24-Hour Reporting
 - 5-Day Follow-up Reporting to the 24-Hour Reporting
 - Reportable Quantity Spills

Additional Reporting

- Where applicable, permittees must submit the following reports to EPA Headquarters (7.4)
 - Planned Changes
 - Anticipated Noncompliance
 - Transfer of Ownership and/or Operation
 - Compliance Schedules
 - Other Noncompliance
 - Other Information
- All of these reports can be submitted and certified via eNOI
 - Also annual reports and exceedance reports

Additional reporting in eNOI

- Report No Discharge
- Report No Further Pollutant Reductions Achievable
- Report Exceedance Due to Natural Background Pollutant Levels

U.S. Environmental Protection Agency



Electronic Notice of Intent
Online Stormwater Application

- HOME
- HELP
- PROFILE
- LOGOUT

Reporting

Submit Discharge Monitoring Data / No Discharge

Submit Discharge Monitoring Data / No Discharge

Please select from the links below to add new monitoring data, edit existing monitoring data or report no discharge for your outfalls, or report no further pollutant reductions are achievable or benchmark exceedances are due to natural background pollutant levels.

To return to the Reporting Home Page click "Cancel".

[Add New Discharge Monitoring Data](#)

[Edit Discharge Monitoring Data](#)

[Report No Discharge](#)

[No Further Pollutant Reductions Are Achievable / Exceedance Due to Natural Background Pollutant Levels](#) 

If you have entered information that is ready to be certified, press the "Cancel" button to return to Reporting Home.

Cancel

Poll Question #5

- What additional type of training do you need to help you comply with the 2008 MSGP?
 - Developing/revising SWPPPs
 - Selecting control measures
 - Using eNOI/Reporting
 - Understanding lab results and visual assessments
 - Inspections/corrective actions

Question and Answer Break



www.epa.gov/npdes/stormwater/msgp

SWPermit@epa.gov

Participation Certificate

- If you would like to obtain participation certificates for multiple attendees, click the link below
- You can type each of the attendees names in and print the certificates

[www.epa.gov/npdes/webcasts/certificate/
msgp_monitoring.pdf](http://www.epa.gov/npdes/webcasts/certificate/msgp_monitoring.pdf)