

DEPARTMENT OF ENVIRONMENT AND NATURAL RESOURCES

DIVISION OF WATER QUALITY

FACT SHEET

GENERAL PERMIT
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
PERMIT TO DISCHARGE STORMWATER

Permit No. NCG030000

Date: September 1, 2012

1. TYPES OF DISCHARGES COVERED

a. Industrial Activities Covered by this General Permit

Coverage under this General Permit is applicable to:

- ◆ All owners or operators of stormwater point source discharges associated with activities classified as establishments primarily engaged in activities classified as establishments primarily engaged in:
 - **Rolling, Drawing, and Extruding of Nonferrous Metals** [standard industrial classification (SIC 335)]
 - **Heat Treating of Metal** (SIC 3398)
 - **Fabricating of Metal Products** (SIC 34)
 - **Manufacturing of Industrial and Commercial Machinery** (SIC 35)
 - **Manufacturing of Electronic Equipment** (SIC 36)
 - **Manufacturing of Transportation Equipment** (SIC 37)
 - **Manufacturing of Measuring and Analyzing Instruments** (SIC 38))
- ◆ Stormwater point source discharges from like industrial activities deemed by DWQ to be similar to these operations in the process, or the discharges, or the exposure of raw materials, intermediate products, by-products, products, or waste products.

Except upon DWQ determination of similarity as provided immediately above, the following activities and associated discharges are excluded from coverage under this General Permit:

Establishments primarily engaged in the **ship and boat building and repairing** (SIC 373), which is covered by general stormwater permit NCG190000.

b. Types of Operations Covered

SIC groups 34, 35, 36, 37, and 38 industry categories include facilities involved in the manufacture of metal and metal-related products, including metal cans; tinware; handtools; cutlery; general hardware; nonelectric heating apparatus; metal forgings; metal stampings; ordnance; engines and turbines; farm and garden machinery; construction machinery; mining machinery; elevators; hoist cranes; monorails; industrial trucks; tractors; industry machinery electricity distribution equipment; electrical industrial apparatus; household appliances; electrical lighting and wiring equipment; radio and TV receiving equipment; communications equipment; electronics components and accessories; motor vehicles; aircraft; guided missiles; space vehicles; boats; railroad equipment; motorcycles; bicycles; snowmobiles; measuring instruments; instruments sensors; optical instruments; lenses; surveying and drafting instruments; hydrological, hydrographic, meteorological, and geophysical equipment; medical equipment; dental equipment; ophthalmic goods; photographic equipment; and watches and clocks.

Facilities involved in the metal finishing industry may include activities best described by the following list from Title 40 Code of Federal Regulations Part 433 (40 CFR § 433):

Cleaning	Other Abrasive Jet	Vapor Plating
Machining	Machining	Thermal Infusion
Grinding	Electrical Discharge	Salt Bath Descaling
Polishing	Machining	Solvent Degreasing
Tumbling	Electrochemical	Paint Stripping
Burnishing	Machining	Painting
Impact Deformation	Electron Beam Machining	Electrostatic
Shearing	Laser Beam Machining	Painting Vacuum
Heat Treating	Plasma Arc Machining	Metalizing
Thermal Cutting	Ultrasonic Machining	Assembly
Welding Brazing	Sintering	Calibration
Soldering	Laminating	Testing
Flame Spraying	Hot Dip Coating	Mechanical Plating
Sand Blasting	Sputtering	

Also, facilities involved in the metal plating operations may include the following activities 40 CFR 413, Effluent Guidelines – Electroplating:

- Electroplating
- Electroless Plating
- Chemical Conversion Coating
- Etching and Chemical Milling
- Anodizing

Facilities involved in the coil coatings operations may include the following activities 40 CFR 465. Effluent Guidelines – Coil Coatings Category:

Coil Coatings with Steel Base Material
 Coil Coatings with Galvanized Base Material
 Coil Coatings with Aluminum Base Material
 Can Making

Facilities involved in electrical and electronic components manufacture may include the following activities, 40 CFR 469 – Electrical and Electronic Components Category:

Semiconductor Manufacture
 Electronic Crystals Manufacture
 Cathode Ray Tube Manufacture
 Luminescent Materials Manufacture

c. Characteristics of Discharged Stormwater

Data submitted in response to the previous NCG030000 permit term covered: **Total Lead, pH, Oil and Grease (O&G), Total Suspended Solids (TSS), and Total Toxic Organics (TTO)** with the vehicle maintenance areas monitored for **pH, O&G, and TSS**. Analysis of data submitted (>2000 samples) indicated that all parameters had values that exceeded current benchmark concentrations but the percent of exceedances were under 10% of the total amount of samples. TSS and Lead had the higher exceedance percentage at 8% and 6% respectively (see Appendix A). The decision to retain parameters from the previous permit was based in part on this assessment, but also on their continued usefulness as stormwater pollution indicators for these industry types—especially within the revised monitoring scheme and tiered responses introduced by this renewal permit.

d. Geographic Area(s) Covered by this General Permit

Discharges covered by this General Permit are located at any place within the political boundary of the State of North Carolina. Discharges located on the Cherokee Indian Tribal Reservation are subject to permitting by the US Environmental Protection Agency and are not covered by this General Permit.

e. Receiving Waters

Receiving waters include all surface waters of North Carolina or municipal separate storm sewer systems conveying stormwater to surface waters.

2. DISCHARGE CONTROLS AND LIMITATIONS

As with the previous renewal, the permit incorporates **benchmark concentrations** to provide facilities a tool with which to assess the effectiveness of best management practices (BMPs). These benchmark concentrations are not effluent limits, but provide guidelines for the facility’s Stormwater Pollution Prevention Plan (SPPP or Plan).

Exceedences of benchmark values require the permittee to increase monitoring, increase management actions, increase record keeping, and/or install stormwater BMPs in a tiered program. The renewal permit institutes semi-annual monitoring throughout the permit term and introduces a tiered approach to specify actions the permittee must take in response to results above benchmark concentrations.

Stormwater must be controlled by the development and implementation of a Stormwater Pollution Prevention Plan (SPPP or Plan). The Plan requirements were updated in this renewal to include: (a) indication in the Site Plan of whether receiving waters were impaired, and (b) a revised schedule for stormwater facility inspections during the calendar year that mirror analytical monitoring requirements. Specific requirements of the Plan can be found in the draft permit posted here:

<http://portal.ncdenr.org/web/wq/ws/su/public-notice>

3. MONITORING AND REPORTING REQUIREMENTS

The permit specifies monitoring and reporting requirements for both quantitative and qualitative assessment of the stormwater discharge and operational inspections of the entire facility. Specific pollutant parameters for which sampling must be performed and the frequency of the sampling are based upon the types of materials used and produced in the manufacturing processes and the potential for contamination of the stormwater runoff at these facilities.

The draft renewal permit proposes specific monitoring requirements for the following parameters for stormwater discharges: **Total Rainfall, pH, Total Petroleum Hydrocarbons (TPH)** [EPA Method 1664 (SGT-HEM), also called “Non-polar Oil & Grease”], **Total Suspended Solids (TSS), Copper, Lead, Zinc, and Total Toxic Organics (TTO)**—unless the facility is waived from TTO monitoring through a Solvent Management Plan. The changes in the suite of parameters include TPH replaces O&G and adding Copper and Zinc. The rationale for retaining these parameters in the renewal permit was based in part on data submitted by permittees, but also on their continued usefulness as stormwater pollution indicators for these industry types within the revised monitoring scheme. In addition to retaining the parameters in the previous permit, Total Copper and Total Zinc have been added to the permit. These parameters were added because of they are potential pollutants for the industrial activities covered, as well as, they were included in some of the Subsectors covering these industries in the *EPA's Multi-Sector General Permit (MSGP)*.

The draft permit incorporates a modified definition of what storm event should be sampled. Previous permits required sampling during a “representative storm event.” The proposed NCG100000 permit renewal now requires permittees to sample the “**measurable storm event**,” a new term for North Carolina stormwater permits. The “measurable storm event” is an event that results in an actual discharge, rather than an event with a rainfall measuring 0.1 inches or more. To qualify as a measurable storm event, the previous storm event must have been at least 72 hours prior. Last year the

NCG140000 Ready-Mixed Concrete General Permit was the first permit to implement this new storm event definition.

The proposed general permit allows the permittee to forgo sampling if *adverse weather* conditions prevent sample collection (see the **Definitions** section of the draft permit). Inability to sample because of adverse weather conditions must be documented in the SPPP and recorded on the data monitoring forms (DMRs). The proposed draft maintains the requirement to separate semi-annual sampling events by a minimum of 60 days.

As before, the renewal permit specifies qualitative (visual) monitoring of each stormwater outfall for the purpose of evaluating the effectiveness of the Stormwater Pollution Prevention Plan and assessing new sources of stormwater pollution. Qualitative monitoring parameters include color, odor, clarity, floating and suspended solids, foam, oil sheen, and other obvious indicators of stormwater pollution. Qualitative monitoring should be performed during the analytic sampling event.

The draft permit proposes more specific direction to the permittee about how to respond to qualitative monitoring. If qualitative monitoring indicates that existing stormwater BMPs are ineffective, or that significant stormwater contamination is present, the permittee must investigate potential causes, evaluate the feasibility of corrective actions, and implement those corrective actions within 60 days. A written record of the permittee’s investigation, evaluation, and response actions must be kept in the SPPP. The draft permit also includes a **Qualitative Monitoring Response**, establishing actions for when a permittee repeatedly fails to respond effectively to correct problems, or if the discharge causes or contributes to a water quality standard violation.

4. COMPLIANCE SCHEDULE

The proposed compliance schedule in Part III, Section A was modified to address facilities that are renewing coverage under this new permit. The permittee shall comply with Limitations and Controls specified for stormwater discharges in accordance with the following schedule:

Existing Facilities already operating but applying for permit coverage for the first time: The Stormwater Pollution Prevention Plan shall be developed and implemented within 12 months of the effective date of the **Certificate of Coverage** and updated thereafter on an annual basis. Secondary containment, as specified in Part II, Section A, Paragraph 2(b) of this general permit, shall be accomplished within 12 months of the effective date of the issuance of the **Certificate of Coverage**.

New Facilities applying for coverage for the first time: The Stormwater Pollution Prevention Plan shall be developed and implemented prior to the beginning of discharges from the operation of the industrial activity and be updated thereafter on an annual basis. Secondary containment, as specified in Part II, Section A, Paragraph 2(b) of this general permit shall be accomplished prior to the beginning of discharges from the operation of the industrial activity.

Existing facilities previously permitted and applying for renewal under this General Permit: All requirements, conditions, limitations, and controls contained in this permit (except new SPPP elements in this permit renewal) shall become effective immediately upon issuance of the

Certificate of Coverage. New elements of the Stormwater Pollution Prevention Plan for this permit renewal shall be developed and implemented within 6 months of the effective date of this general permit and updated thereafter on an annual basis. Secondary containment, as specified in Part III, Paragraph 2(b) of this general permit shall be accomplished prior to the beginning of discharges from the operation of the industrial activity.

5. SPECIAL CONDITIONS WHICH WILL HAVE A SIGNIFICANT IMPACT ON THE DISCHARGE

If a facility that is required to perform the Total Toxic Organics (TTO) monitoring develops a solvent management plan and makes the certification detailed in the permit, the facility not be required to perform TTO monitoring.

6. BASIS FOR CONTROLS AND LIMITATIONS

The conditions of this general permit have been designed using best professional judgment to achieve water quality protection through compliance with the technology-based standards of the Clean Water Act (Best Available Technology [BAT] and Best Conventional Pollutant Control Technology [BCT]). Where the Director determines that a water quality violation is occurring and water quality-based controls or effluent limitations are required to protect the receiving waters, coverage under the general permit shall be terminated and an individual permit will be required. Based on a consideration of the appropriate factors for BAT and BCT requirements, and a consideration of the factors discussed below in this fact sheet for controlling pollutants in stormwater discharges associated with the activities as described in Item 1 (Types of Discharge Covered), the permit retains a set of requirements for developing and implementing stormwater pollution prevention plans, and specific requirements for monitoring and reporting on stormwater discharges.

The permit conditions reflect the Environmental Protection Agency's (EPA) and North Carolina's pollution prevention approach to stormwater permitting. The quality of the stormwater discharge associated with an industrial activity will depend on the availability of pollutant sources. This renewal permit still reflects the Division's position that implementation of Best Management Practices (BMPs) and traditional stormwater management practices which control the source of pollutants meets the definition of BAT and BCT. The permit conditions are not numeric effluent limitations, but rather are designed to be flexible requirements for developing and implementing site specific plans to minimize and control pollutants in the stormwater discharges associated with the industrial activity.

Title 40 Code of Federal Regulations (CFR) Part 122.44(k)(2) authorizes the use of BMPs in lieu of numeric effluent limitations in NPDES permits when the agency finds numeric effluent limitations to be infeasible. The agency may also impose BMP requirements which are "reasonably necessary" to carry out the purposes of the Act under the authority of 40 CFR 122.44(k)(3). The conditions of the renewal permit are retained under the authority of both of these regulatory provisions. The pollution prevention requirements (BMP requirements) in this permit operate as limitations on effluent discharges that reflect the

application of BAT/BCT. The basis is that the BMPs identified require the use of source control technologies which, in the context of this general permit, are the best available of the technologies economically achievable (or the equivalent BCT finding).

All facilities covered by this stormwater general permit must prepare, retain, implement, and (at a minimum of annually) update a stormwater pollution prevention plan. The term "pollution prevention" distinguishes this source reduction approach from traditional pollution control measures that typically rely on end-of-pipe treatment to remove pollutants in the discharges. The plan requirements are based primarily on traditional stormwater management, pollution prevention and BMP concepts, providing a flexible basis for developing site-specific measures to minimize and control the amounts of pollutants that would otherwise contaminate the stormwater runoff.

The pollution prevention approach adopted in the stormwater pollution prevention plans in the renewal permit still focuses on two major objectives: 1) to identify sources of pollution potentially affecting the quality of stormwater discharges associated with industrial activity from the facility; and 2) to describe and ensure that practices are implemented to minimize and control pollutants in stormwater discharges associated with industrial activity from the facility and to ensure compliance with the terms and conditions of this permit.

The Division believes that it is not appropriate, at this time, to require a single set of effluent limitations or a single design or operational standard for all facilities which discharge stormwater associated with industrial activity. This permit instead establishes a framework for the development and implementation of site-specific stormwater pollution prevention plans. This framework provides the necessary flexibility to address the variable risk for pollutants in stormwater discharges associated with the industrial activities that are addressed by this permit, while ensuring procedures to prevent stormwater pollution at a given facility are appropriate given the processes employed, engineering aspects, functions, costs of controls, location, and age of facility (as discussed in 40 CFR 125.3). This approach allows flexibility to establish controls which can appropriately address different sources of pollutants at different facilities.

In 1979, EPA completed a technical survey of industry best management practices (BMPs) which was based on a review of practices used by industry to control the non-routine discharge of pollutants from non-continuous sources including runoff, drainage from raw material storage areas, spills, leaks, and sludge or waste disposal. This review included analysis and assessment of published articles and reports, technical bulletins, and discussions with industry representatives through telephone contacts, written questionnaires and site visits. The technical survey identified two classes of pollution control measures.

The first class of controls are those management practices which are generally considered to be essential to the development of an effective and efficient BMP program, low in cost, and applicable to broad categories of industries and substances. These controls include the following: developing a Spill Control Committee and implementing spill reporting, material

inventorying and compatibility reviews, employee training, visual inspections, preventative maintenance programs, good housekeeping, and addressing security issues. These practices are broadly applicable to all industries and can be implemented by each facility independent of the category of industry, ancillary sources, specific chemicals used at different sites, and/or plant site locations. The survey concluded that these controls should be minimum requirements for any effective BMP program.

The second class of controls includes management practices which provide for a second line of defense against the release of pollutants. These controls include prevention measures, containment measures, mitigation and cleanup measures and treatment methods. The types of chemicals, industrial operations and various ancillary sources specify the controls applicable to an individual facility.

The EPA and NPDES States have, on a case-by-case basis, imposed BMP requirements in NPDES permits. The EPA has also continued to review and evaluate case studies involving the use of BMPs and the use of pollution prevention measures associated with spill prevention and containment measures for oil. The development of the NPDES permit application requirements for stormwater discharges associated with industrial activity resulted from the evaluation and identification of the potential contaminants and the resultant water quality impacts of stormwater discharges from industrial sites. Public comments received during the rule making provided additional insight regarding stormwater risk assessment, as well as appropriate pollution prevention and control measures and strategies. During that time EPA again reviewed stormwater control practices and measures. These experiences have shown the Division that pollution prevention measures such as BMPs can be appropriately used and that permits containing BMP requirements can effectively reduce pollutant discharges in a cost-effective manner. BMP requirements are being appropriately imposed in general permits in lieu of numeric effluent limitations pursuant to 40 CFR 122.44(k)(2).

There has been no change to this rationale since the previous general permit.

Stormwater Benchmarks

The proposed **pH benchmark** range is based on N.C. Water Quality Standards in 15A NCAC 02B .0211 and is consistent with other renewed general stormwater permits. The TPH benchmark of 15 mg/l is consistent with other States' benchmarks and/or limits and reflects a value we would associate only with significant oil contamination. See **Appendix A** for more information on TPH.

The standard **total suspended solids (TSS) benchmark** of 100 mg/l is based on the median concentration derived from the National Urban Runoff Program (NURP) study in 1983 and serves as a benchmark in most other industrial stormwater permits with TSS monitoring. The lower TSS benchmark for ORW, HQW, trout, and primary nursery area (PNA) waters of 50 mg/l reflects half that standard value and was set to flag potential problems in discharges to waters with much lower water quality standards for TSS concentrations (20 mg/l for HQW and ORW; 10 mg/l for trout and PNA waters).

The benchmarks for **Copper (Cu), Lead (Pb) and Zinc (Zn)** remain at 0.007mg/l (or 7µg/l), 0.030 mg/l (or 30 µg/l), and 0.067 mg/l (or 67 µg/l) respectively. These values are the ½ FAV for copper, lead, and zinc based on current DWQ calculation methodology for total recoverable lead. North Carolina is proposing changes to water quality (WQ) metals standards that will establish dissolved metals standards for the first time. If those WQ standards are finalized, acute values for *total recoverable* metals will change as a result of a revised translation method (for translating a dissolved value to a total recoverable value, which federal NPDES regulations require to be used in a permit) and a different assumed water hardness. However, the proposed metals standards will not be finalized for some time. Because those changes are not final, DWQ is not proposing a new stormwater benchmarks at this time.

Total toxic organics (TTO) is a parameter representing the sum total of multiple organic compounds (depending on the industry). The same benchmark from the current permit, 1.0 mg/l, is proposed. Please refer to **Appendix C** for an explanation of the TTO benchmark and footnote development for this permit.

The **TPH [EPA Method 1664 (SGT-HEM)] benchmark** is 15.0 mg/l. DWQ is replacing O&G with TPH, which can be analyzed cost effectively with the same method used to measure O&G: EPA Method 1664 (SGT-HEM). The permit does not require the more elaborate and typically more expensive TPH analysis with gas chromatography. The basis of this change is that O&G is composed of fatty matter from animal and vegetable sources and hydrocarbons of petroleum origin. Because TPH targets the family of chemical compounds that originally come from crude oil such as gasoline, diesel, kerosene, etc., TPH is more suited for vehicle maintenance activities. A lower benchmark also applies. Instead of the 30 mg/l O&G benchmark, the TPH benchmark is 15 mg/l, which is consistent with other States’ benchmarks and/or limits. We would only expect in discharges associated with significant oil contamination to exceed this benchmark. DWQ also found lab costs to be comparable to O&G analysis and reasoned the change would not pose a significant burden on permittees.

7. REQUESTED VARIANCES OR ALTERNATIVES TO REQUIRED STANDARDS

There are no requested variances or alternatives to required standards. Facilities requesting variances to required standards will not be covered under this General Permit but will instead be required to seek coverage under an individual permit.

8. THE ADMINISTRATIVE RECORD

The administrative record, including application, draft permit, fact sheet, public notice, comments received, and additional information is available by writing to:

Stormwater Permitting Unit
 Division of Water Quality
 1617 Mail Service Center
 Raleigh, North Carolina 27699-1617

The above documents are available for review and copying at:

Archdale Building, 9th Floor
 Surface Water Protection Section
 Stormwater Permitting Unit
 512 N. Salisbury Street
 Raleigh, North Carolina

between the hours of 8:00 AM and 5:00 PM Monday through Friday. Copies will be provided at a charge of 10 cents per page.

9. STATE CONTACT

Additional information about the draft and final permit may be obtained at the above address between the hours of 8:00 AM and 5:00 PM Monday through Friday by contacting: **Brian Lowther** at (919) 807-6368.

10. SCHEDULE OF PERMIT ISSUANCE

Draft Permit to Public Notice – **Notice September 4, 2012;**
Draft available on-line September 4, 2012

Permit Issue Date – **October 19, 2012 (Scheduled);**
Effective November 1, 2012 (Scheduled)

11. PROCEDURE FOR THE FORMULATION OF FINAL DETERMINATIONS

a. Comment Period

The Division of Water Quality proposed to issue an NPDES General Permit for the above described stormwater discharges subject to the outlined effluent limitations, management practices, and special conditions. These determinations were open to comment from the public.

Interested persons were invited to submit written comments on the permit application or on the Division of Water Quality’s proposed determinations to the following address:

Stormwater Permitting Unit
 Division of Water Quality
 1617 Mail Service Center
 Raleigh, North Carolina 27699-1617
 Attn: **Brian Lowther**

All comments received within thirty days following the date of public notice were considered in the formulation of final determinations.

b. Public Meeting

The Director of the Division of Water Quality may hold a public meeting if there is a significant degree of public interest in a proposed permit or group of permits. Public notice of such a meeting will be circulated in newspapers in the geographical area of the discharge and to those on the Division of Water Quality mailing list at least thirty days prior to the meeting. The Division did not receive any requests for a public hearing on the draft permit.

c. Appeal Hearing

An applicant whose permit is denied, or is granted subject to conditions he deems unacceptable, shall have the right to a hearing before the Commission upon making written demand to the Office of Administrative Hearing within 30 days following issuance or denial of the permit.

d. Issuance of a Permit When no Hearing is Held

If no public meeting or appeal hearing is held, after review of the comments received, and if the Division of Water Quality determinations are substantially unchanged, the permit will be issued and become effective immediately. This will be the final action of the Division of Water Quality.

If a public meeting or appeal hearing is not held, but there have been substantial changes, public notice of the Division of Water Quality revised determinations will be made. Following a 30-day comment period, the permit will be issued and will become effective immediately. This will be the final action of the Division of Water Quality unless a public meeting or appeal hearing is granted.

APPENDIX A

Data Analysis Summary

NCG030000 Monitoring Data provided by Google Document summarized

Summary of NCG03 DMRs (2007-2012)					
	Total Suspended Solids	pH	Lead Total Recovered	Oil & Grease	Total Toxic Organics
Number of Samples Submitted	2498.0	2427.0	2436.0	2433.0	2033.0
Average sample value	45.1	6.5	0.2	2.0	0.1
Benchmark	100.0	6-9	0.0	30.0	1.0
No. of samples above benchmark	201.0	88.0	145.0	8.0	8.0
% of samples above benchmark	8%	4%	6%	0.33%	0.39%

Compiled by Brian Lowther

APPENDIX B

NPDES Stormwater General Permits NCG030000 and NCG100000 Total Toxic Organics (TTO) Benchmark Development

No changes proposed to 2007 basis for TTO benchmark

1. Reference: Subchapter N - Effluent Guidelines and Standards, 40CFR433.10ff, Part 433 – Metal Finishing Point Source Category. Forty-six types of metal finishing operations are listed, appearing to be a comprehensive list of the types of activities that might be labeled, ‘metal finishing.’
 - a. Subpart A presents wastewater and pretreatment effluent limitations in 433.13, 433.14, 433.15, 433.16, and 433.17 for BPT, BAT, PSES, NSPS, and PSNS respectively. These paragraphs uniformly present a TTO effluent limitation of 2.13 mg/L maximum for any one day. No monthly average effluent limitation is established.
 - b. TTO for the metal finishing category includes 111 toxic organics, including solvents, chlorinated hydrocarbons, pesticides, PCBs, and dioxin. The reportable value for the TTO analysis is the sum of all concentrations for the 111 analytes greater than 0.01 mg/L.
 - c. Paragraph 433.12(a) provides that in lieu of TTO monitoring the permitting authority may allow the permittee to certify on each DMR that there has been no dumping of concentrated TTO into the wastewater stream.
 - d. Further, 433.12(a) provides that if TTO monitoring is required, the permittee may ‘analyze for only those pollutants that would reasonably be expected to be present.’
 - e. Paragraph 433.12(b) provides that if the permittee selects the certification alternative to TTO monitoring, he must submit a solvent management plan to the permitting authority’s satisfaction, and that the plan shall be incorporated as a part of the permit.

2. DWQ had established stormwater benchmark values for sixteen of the 111 toxic organics: benchmark values of 0 ug/L for dioxin and for the 7 PCBs; anthracene – 0.005 mg/L; pentachlorophenol – 0.019 mg/L; toluene – 0.055 mg/L and 0.0018 mg/L in trout waters; 1.0 mg/L for 2,4-dimethylphenol and for naphthalene; acrylonitrile – 3.8 mg/L; phenol – 4.5 mg/L in trout waters; and benzene – 6.7 mg/L.

3. The current draft permit provides as follows:
 - a. The permittee may elect to develop a solvent management plan and incorporate it in his SPPP. All in imitation of the federal effluent guidelines for wastewater and pretreatment discharges. Consistent with the previous version of the permit.
 - b. DWQ is willing to work with the permittee on alternate analyses and/or benchmarks to satisfy the TTO monitoring requirement (See Table 3 in Part II, Section B that notes TTO contains multiple compounds with varying environmental

impact). This provision is parallel to, but not identical to, the federal provision establishing that wastewater permittees need only analyze for the pollutants reasonably expected to be present.

- c. **The benchmark is set at 1.0 mg/L.** This is not a limit value in the sense that an exceedence constitutes a permit violation. This is more like an action level value. DWQ has benchmark values set for only a very small portion of the TTO suite. A value of 1.0 mg/L corresponds to our benchmarks for naphthalene and 2,4-dimethylphenol. Three benchmark values are above 1.0 mg/L, and 11 benchmark values are below 1.0 mg/L.
- d. DWQ may evaluate analysis results and determine if any chemicals are present at levels of concern, even if below 1.0 mg/l, and require appropriate actions.