Mitchell, Williams, Selig, Gates & Woodyard, P.L.L.C.



Walter Wright, Jr. wwright@mwlaw.com (501) 688.8839

## Permits Overview – Industrial Stormwater/Municipal Separate Storm Sewer System/Individual NPDES: Bryan Leamons P.E. (Arkansas Department of Environmental Quality) Arkansas Water Works and Water Environment Association Presentation

06/09/2017

Bryan Leamons, P.E., undertook a presentation at the Arkansas Water Works and Water Environment Association titled:

Permits Overview: Industrial Stormwater (IGP), Municipal Separate Storm Sewer System (MS4), Individual NPDES ("Presentation")

Mr. Leamons is a Senior Operation Manager in the Arkansas Department of Environmental Quality ("ADEQ") Office of Water.

The *Presentation* included a discussion of Clean Water Act General Permit – 40 CFR 124.1 which authorizes:

... a category of dischargers or activities under the Clean Water Act within a geographical area...

General Permits include Industrial Stormwater Permits (General Permit ARR000000) encompassing industrial activities such as:

- Timber, Paper, and Chemical Products
- Metal, Coal, and Mineral Mining
- Transportation Facilities
- Textile Mills
- Others

Mr. Leamons discussed the application procedures for AR000000:

- Notice of Intent
- Stormwater Pollution Prevention Plan
- Site Map
- \$200.00 Application Fee

The No-Exposure Certification was also referenced.

As to the Stormwater Pollution Prevention Plan, the contents were listed such as:

- Responsible Parties and Employee Training
- Facility Information and Description
- Potential Pollutant Sources
- Impaired Waterbodies (303(d) list and TMDLs)
- Best Management Practices (BMPs)
- Outfalls and Monitoring Requirements
- Schedules and Procedures
- Signature

The Municipal Separate Storm Sewer System ("MS4")was addressed (ARR040000).

MS4 is applicable to urbanized areas.

The application procedures were stated to include:

- Notice of Intent
- Stormwater Management Plan
- Small MS4 Site Map
- Application Fee

The Stormwater Management Plan Contents were stated to include:

- Part 3 of the General Permit
- BMPs the MS4 will implement
- Table of Organization
- 6 Minimum Control Measures
- Public Involvement/Participation
- Illicit Discharge Detection and Elimination
- Construction Site Stormwater Runoff Control
- Post-Construction Stormwater Management
- Pollution Prevention (Good Housekeeping)
- Public Education

The *Presentation* included a chart comparing stormwater permits and MS4.

As to the "IGP" it was noted:

- Regulates Stormwater Discharge on Numerous Industrial Sectors
- Many facilities make self-monitoring and self-implemented corrective measures
- ADEQ retains full compliance monitoring and enforcement oversight

As to MS4s it was noted:

- Cities, counties, "urbanized areas"
- Non traditional Campuses and Prisons
- ADEQ performs inspections and audits over 5-year term
- Much reliance on self-monitoring and self-implemented activities
- ADEQ retains full compliance monitoring and enforcement oversight

The final portion of the *Presentation* addressed the Clean Water Act National Pollution Discharge Elimination System ("NPDES") individual permitting/renewals.

Mr. Leamons states submissions for NPDES Permits and renewals can be made as follows:

By mail to:

**NPDES Permits Section** 

Office of Water Quality

Arkansas Department of Environmental Quality

5301 Northshore Drive

North Little Rock, AR 72118

• Or by electronic mail (Complete documents must be submitted in Adobe Acrobat format (.pdf) to:

Water.permit.application@adeq.state.ar.us.

ePortal: <a href="https://eportal.adeq.state.ar.us/">https://eportal.adeq.state.ar.us/</a>

A copy of Mr. Leamons Presentation can be downloaded here.