Storm Water

What impact will it have on Pretreatment Programs?

- Jerry Baumgartner -- City of Portland
- Clayton Brown -- Clean Water Services
Why Take on Industrial Storm Water Discharges?

- Phase 1 Municipality--responsible for its industrial storm water dischargers under MS4 NPDES permit.
- Municipality—identify industrial sources discharging into its system, and pollutant loading.
- NPDES Control Authority--Issuing General Permits to Industrial Dischargers to your system.
- Ultimate City Liability.
- Environmental Stewardship.
Storm Water vs. Pretreatment

- Pretreatment regulation—very prescriptive, detailed, directive, and complex (pages of regulation—sleep aid).

- Storm Water regulation—not prescriptive nor clearly defined, very elective—You decide scope of your program.
What are the Requirements?

- Program Description 40 CFR 122.26(d)(2)(iv)(C)

A description of a program to monitor and control pollutants in storm water discharges to municipal systems from municipal landfills, hazardous waste treatment, disposal and recovery facilities, industrial facilities subject to section 313 of title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA), and industrial facilities that the municipal permit applicant determines are contributing a substantial pollutant loading to the municipal storm sewer system. The program shall:

- (1) Identify priorities and procedures for inspections and establishing and implementing control measures for such discharges;
- (2) Describe a monitoring program for storm water discharges associated with the industrial facilities identified in paragraph (d)(2)(iv)(C) of this section,......
What Are Your Options?

- Default to NPDES Control Authority.
- Keep track of NPDES-permitted facilities within your jurisdiction.
- Inspect and monitor NPDES-permitted facilities within your jurisdiction.
- Approach similar to Pretreatment Program-Partner with Control Authority.
Portland Storm Water Program

- 1993 Evaluate Context of Program.
- Approach like pretreatment program.
- 1994 MOA Signed with DEQ.
  - DEQ—Permit Issuance.
  - Portland—Review Applications and SWPCP, Inspect, Monitor, Enforce.
- 1994—Project Manager.
- 1996—Two permit managers.
- 2007—Five permit managers.
## Industrial Storm Water Facility Profile

<table>
<thead>
<tr>
<th></th>
<th>NPDES General Permit (1200Z)</th>
<th>NPDES Columbia Slough (1200Cols)</th>
<th>Total Facilities</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Portland Separate Storm Sewer</strong></td>
<td>75</td>
<td>75</td>
<td>150</td>
</tr>
<tr>
<td><strong>Direct Discharge</strong></td>
<td>40</td>
<td>55</td>
<td>95</td>
</tr>
<tr>
<td><strong>No Exposure Certifications</strong></td>
<td>80</td>
<td>80</td>
<td>160</td>
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<tr>
<td><strong>Total Storm Water Facilities</strong></td>
<td>195</td>
<td>210</td>
<td>405</td>
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<tr>
<td><strong>Overlap-Pretreatment Facilities</strong></td>
<td>42</td>
<td>32</td>
<td>74</td>
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</table>
CWS Storm Water Program

- Evaluate your Pretreatment Program for efficiency improvements.
- Determine staffing and resource needs.
- Develop an inspection and monitoring plan.
- Develop a Permit Information Management System.
Program Efficiencies

- Make storm water program similar to pretreatment:
  - Inspection review forms
  - Plan review checklists
  - Database management & reports
In 2000, Storm Water Less than 5%

By 2007, Storm Water at 33%

Major Program Time Distribution 2006

- Pre, 8249, 68%
- Storm, 3211, 27%
- FOG, 636, 5%
Resource Impacts

- No staff added to pretreatment program.
- Efficiency improvements begun in 1999 allowed existing staff to absorb storm water oversight, with resulting increase in number of permits managed per FTE.
Projected Stormwater Permit Growth

Year

Number

1999 2000 2001 2002 2003 2004 2005 2006 2007 2008 2009 2010

0 20 50 100 150 200 250 300 350

1200Z

NEC
Case Study, Clean Water Services

Growth in Storm Water Permitting

- 1200Z
- NEC

Year:
- 1999
- 2000
- 2001
- 2002
- 2003
- 2004
- 2005
- 2006
- 2007

Number:
- 0
- 10
- 20
- 30
- 40
- 50
- 60
- 70
- 80
- 90

Graph showing the growth in storm water permitting from 1999 to 2007 for 1200Z and NEC.
Case Study--Clean Water Services

Growth in Workload Associated with Storm Water Permit Growth

- **1200Z**
- **NEC**
- **Workload FTE/Year**

<table>
<thead>
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<th>Year</th>
<th>Number of permits</th>
<th>Workload FTE/Year</th>
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<tr>
<td>1999</td>
<td>0</td>
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</tr>
<tr>
<td>2001</td>
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<td>2002</td>
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<tr>
<td>2010</td>
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Questions???

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Cheers
Dancing with the NACWA Stars