

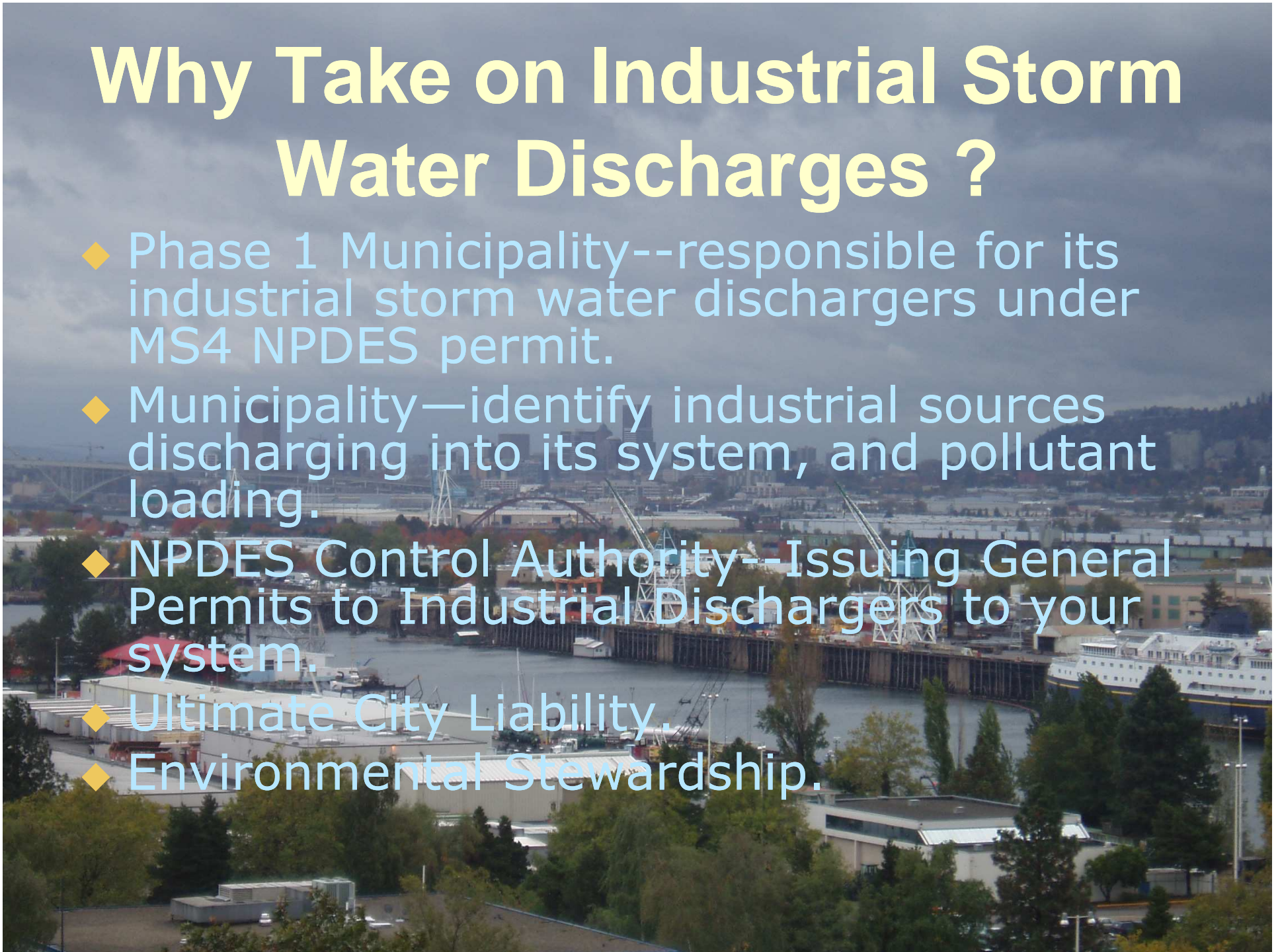
Storm Water

◆ **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.
- 
- A stylized, dark teal silhouette of a mountain range is positioned in the bottom right corner of the slide, partially overlapping the bottom edge of the text area.


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.
- 
- A stylized, dark teal silhouette of a mountain range is positioned in the bottom right corner of the slide, partially overlapping the bottom edge of the text area.

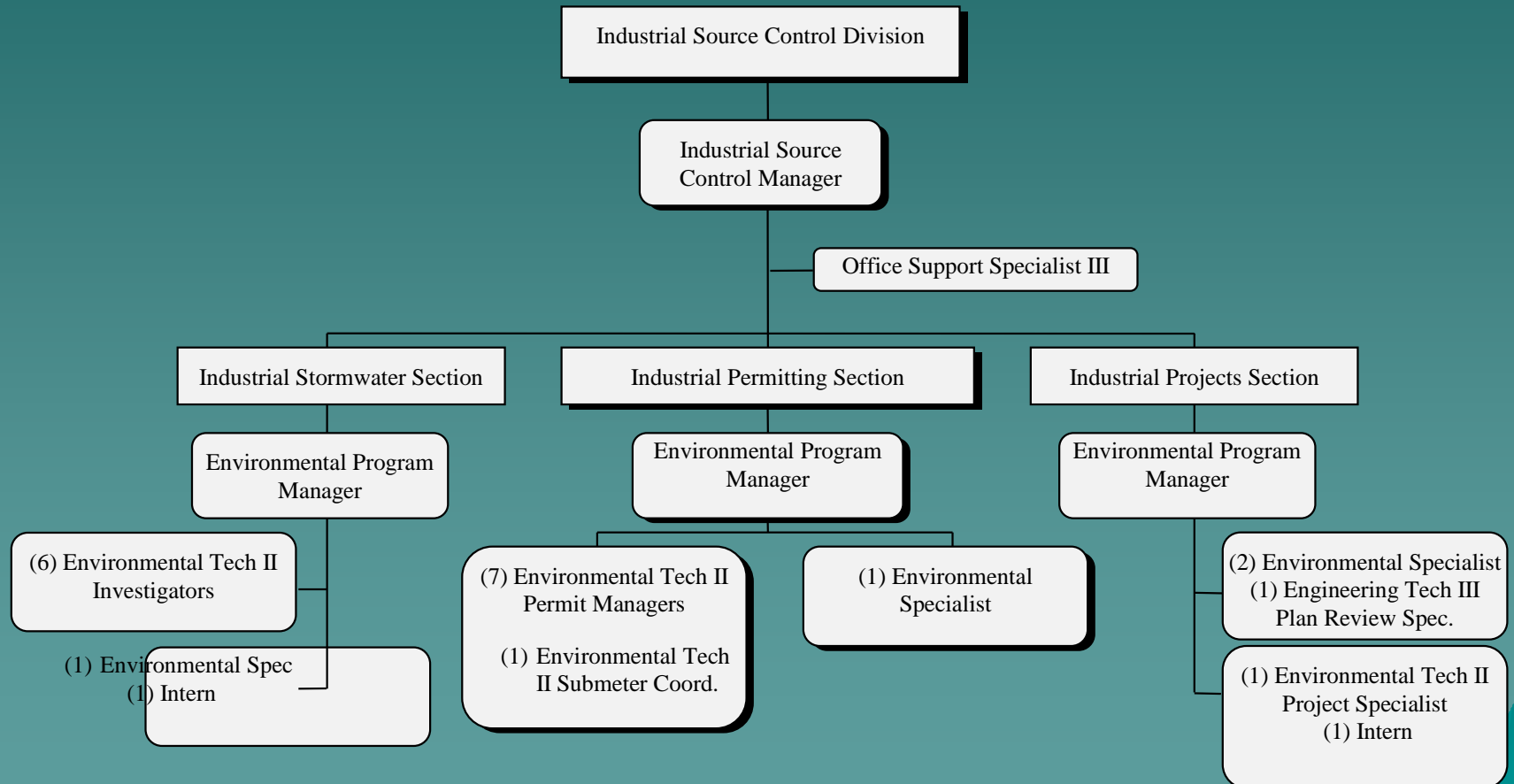
Portland Storm Water Program

- ◆ 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.
- 
- A stylized teal silhouette of a mountain range is located in the bottom right corner of the slide, partially overlapping the text area.


Industrial Storm Water Facility Profile

	Number Industrial Storm Water Facilities		
	NPDES General Permit (1200Z)	NPDES Columbia Slough (1200Cols)	Total Facilities
Portland Separate Storm Sewer	75	75	150
Direct Discharge	40	55	95
No Exposure Certifications	80	80	160
Total Storm Water Facilities	195	210	405
Overlap-Pretreatment Facilities	42	32	74

Industrial Source Control Division



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.
- 
- A stylized, dark teal silhouette of a mountain range is positioned in the bottom right corner of the slide, partially overlapping the bottom edge of the text area.

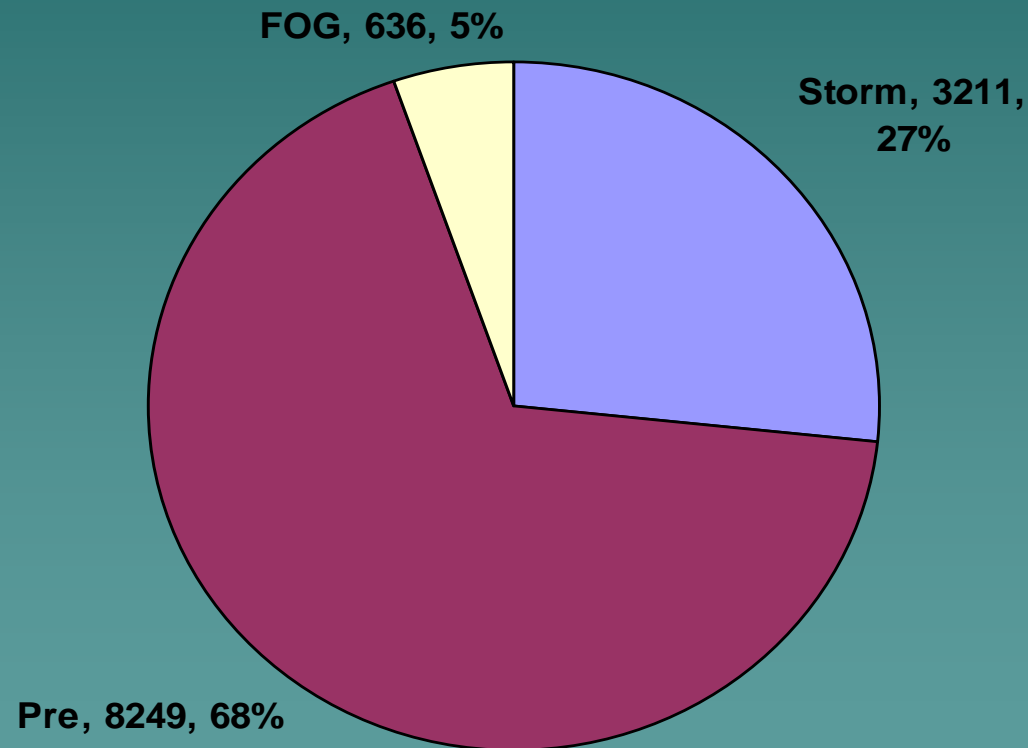
Program Efficiencies

- ◆ 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%

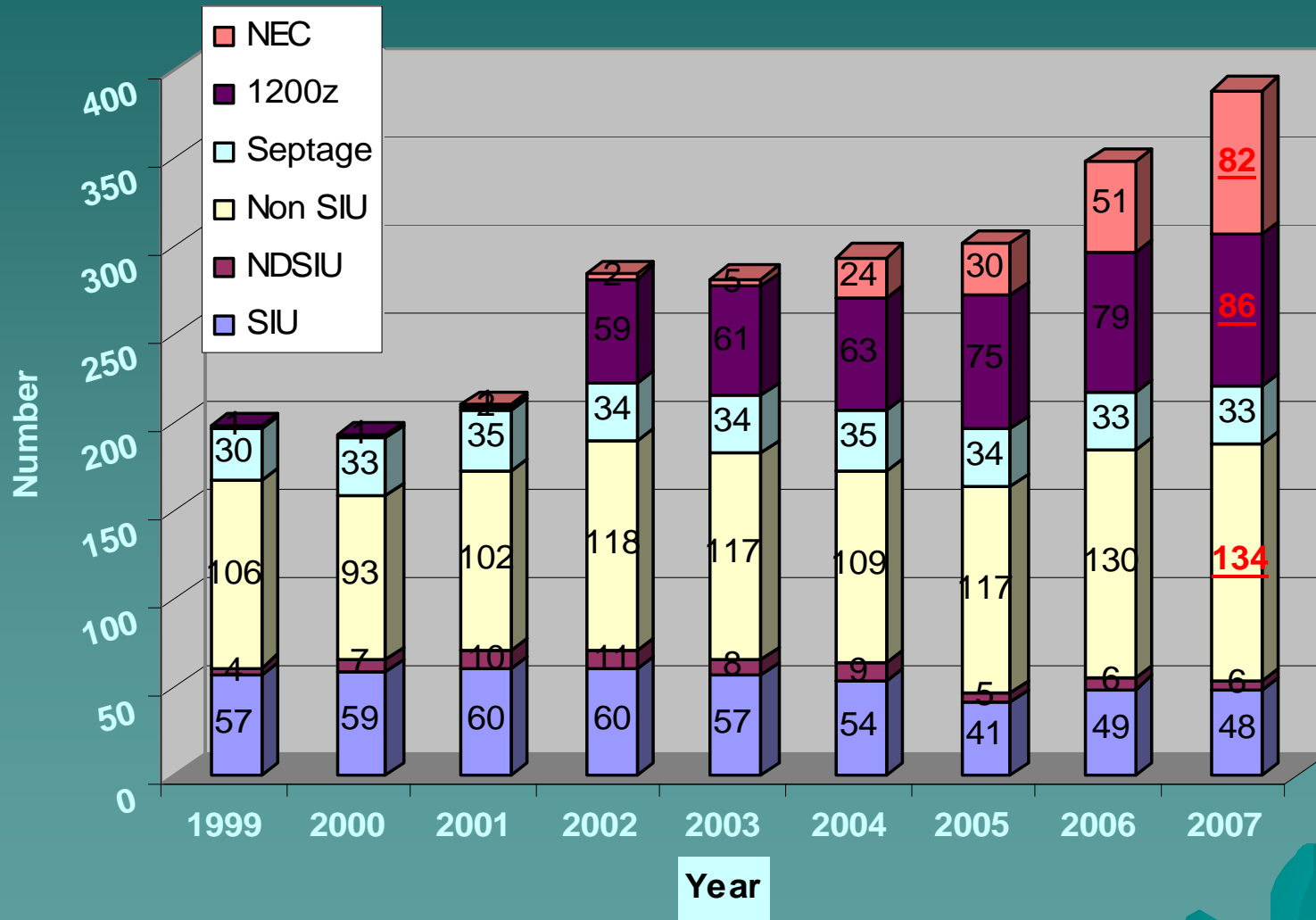
Major Program Time Distribution 2006



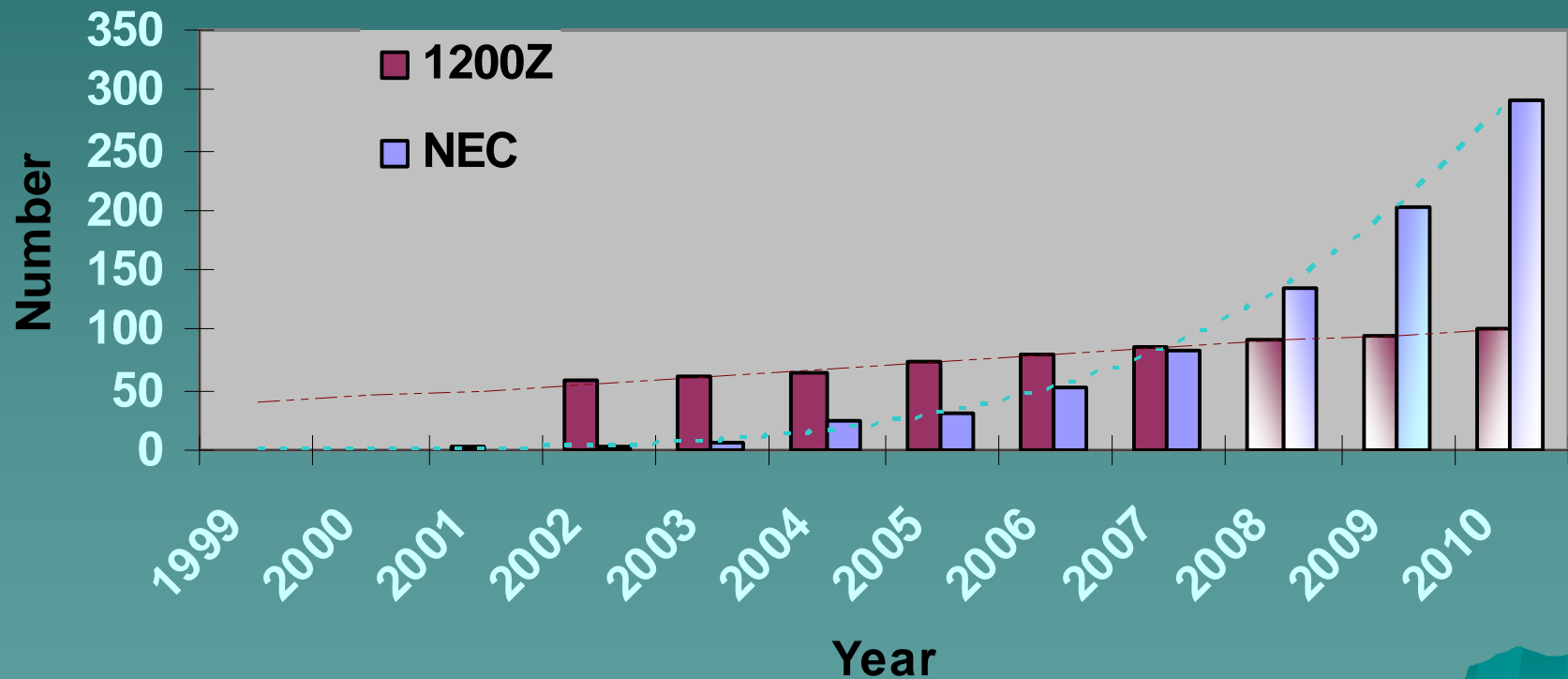
Resource Impacts

- ◆ 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.

Storm Water Permit Growth

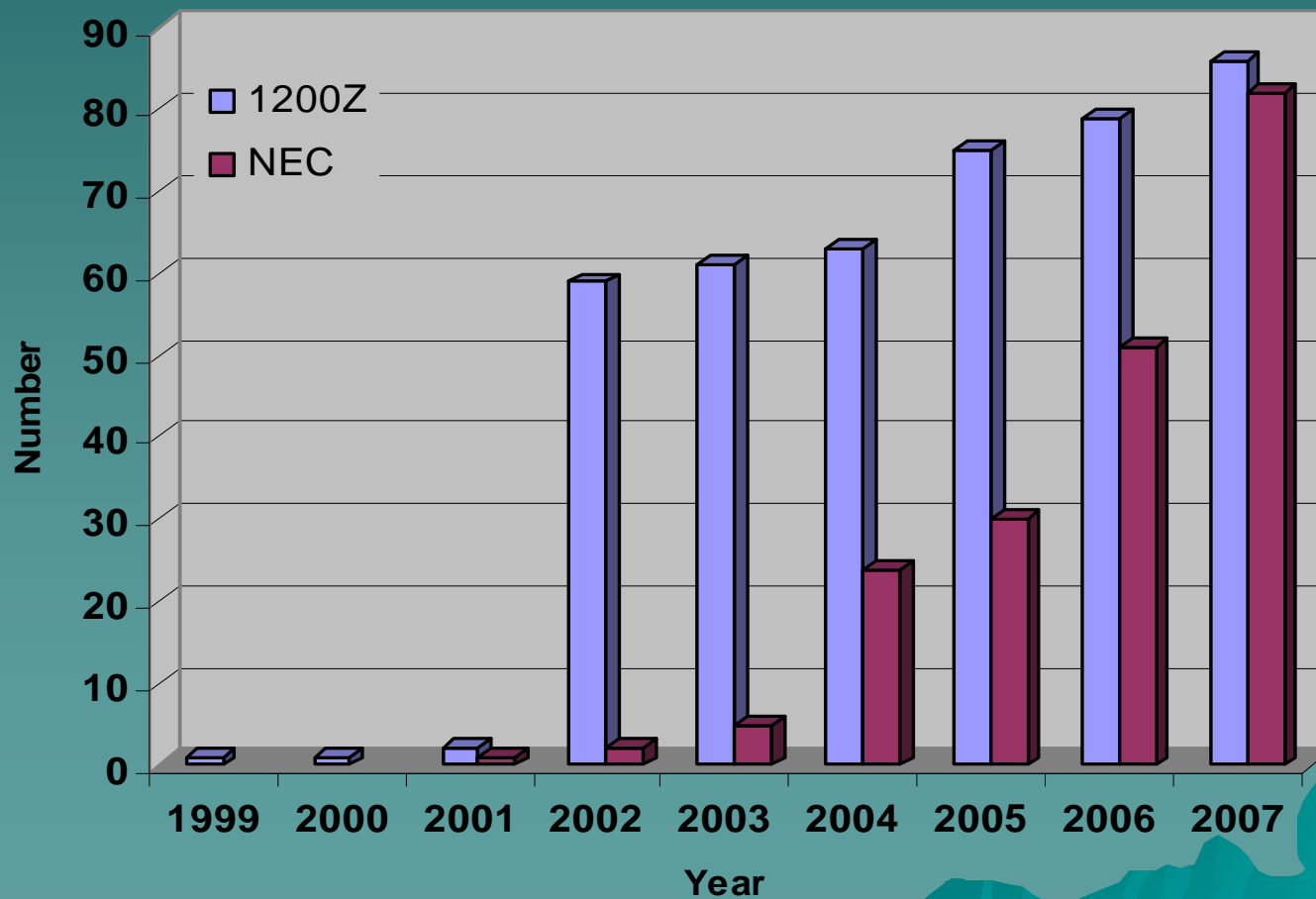


Projected Stormwater Permit Growth



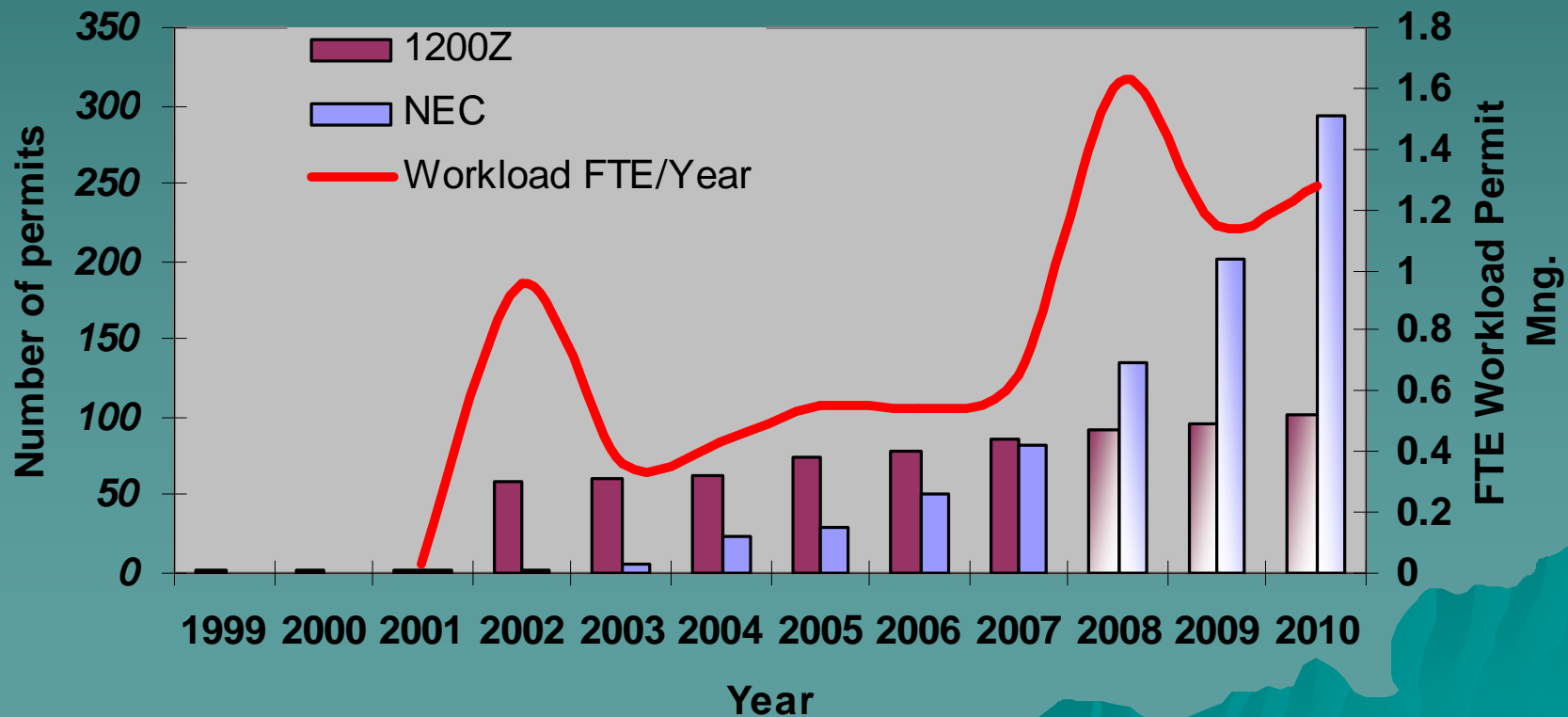
Case Study, Clean Water Services

Growth in Storm Water Permitting



Case Study--Clean Water Services

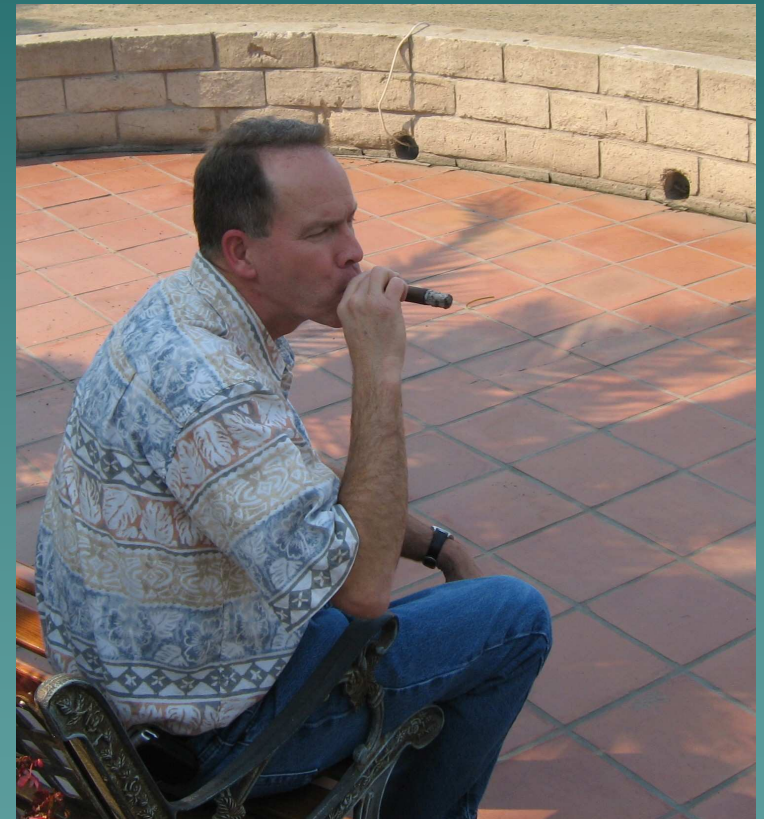
Growth in Workload Associated with Storm Water Permit Growth



Questions???

- ◆ jerryb@bes.ci.portland.or.us
- ◆ brownc@cleanwaterservices.org
- ◆ <http://www.portlandonline.com/bes/index.cfm?c=31844>

Cheers



Dancing with the NACWA Stars

