

# 1200-Z Industrial Stormwater Discharge General Permit Renewal

Presenting: Krista Ratliff, Permit Writer



Zoom Webinar  
May 18, 2021

# Using Zoom Webinar

- Hear the audio either through your computer or by calling in by phone with the phone number provided
- Note that you will not be able to speak unless the host enables your audio and then you unmute
- Use chat if you're having technical difficulties



# Asking a Question

- If you would like to ask a question verbally



- Raise your hand and the host will un-mute you (\*9 if you're on the phone)
- \*6 to un-mute phone and speak

# Asking a Question

- You should see the following along the bottom of your screen



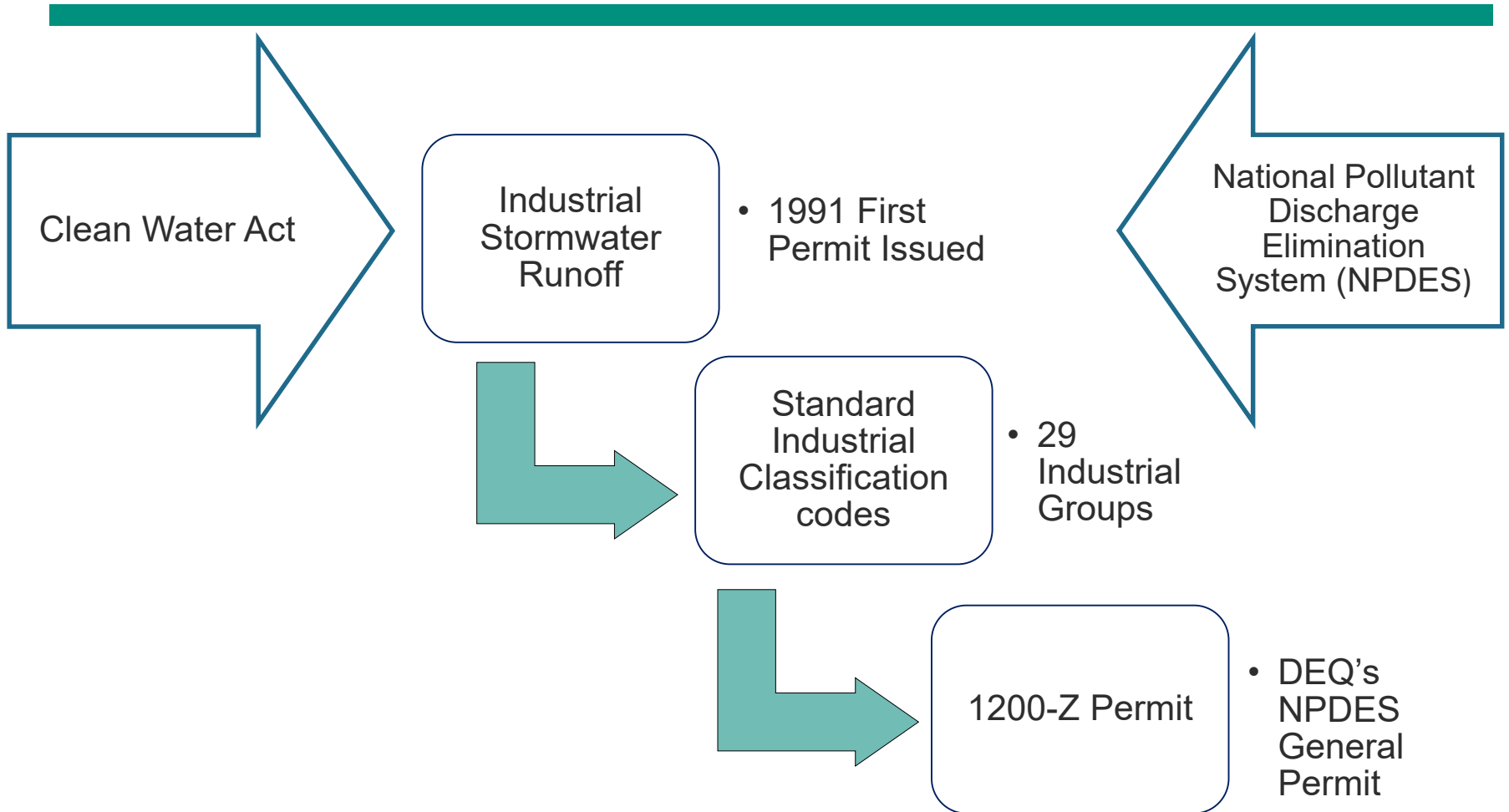
- To ask a question: type it into the Q&A
- We will answer questions throughout the presentation

# Webinar Outline

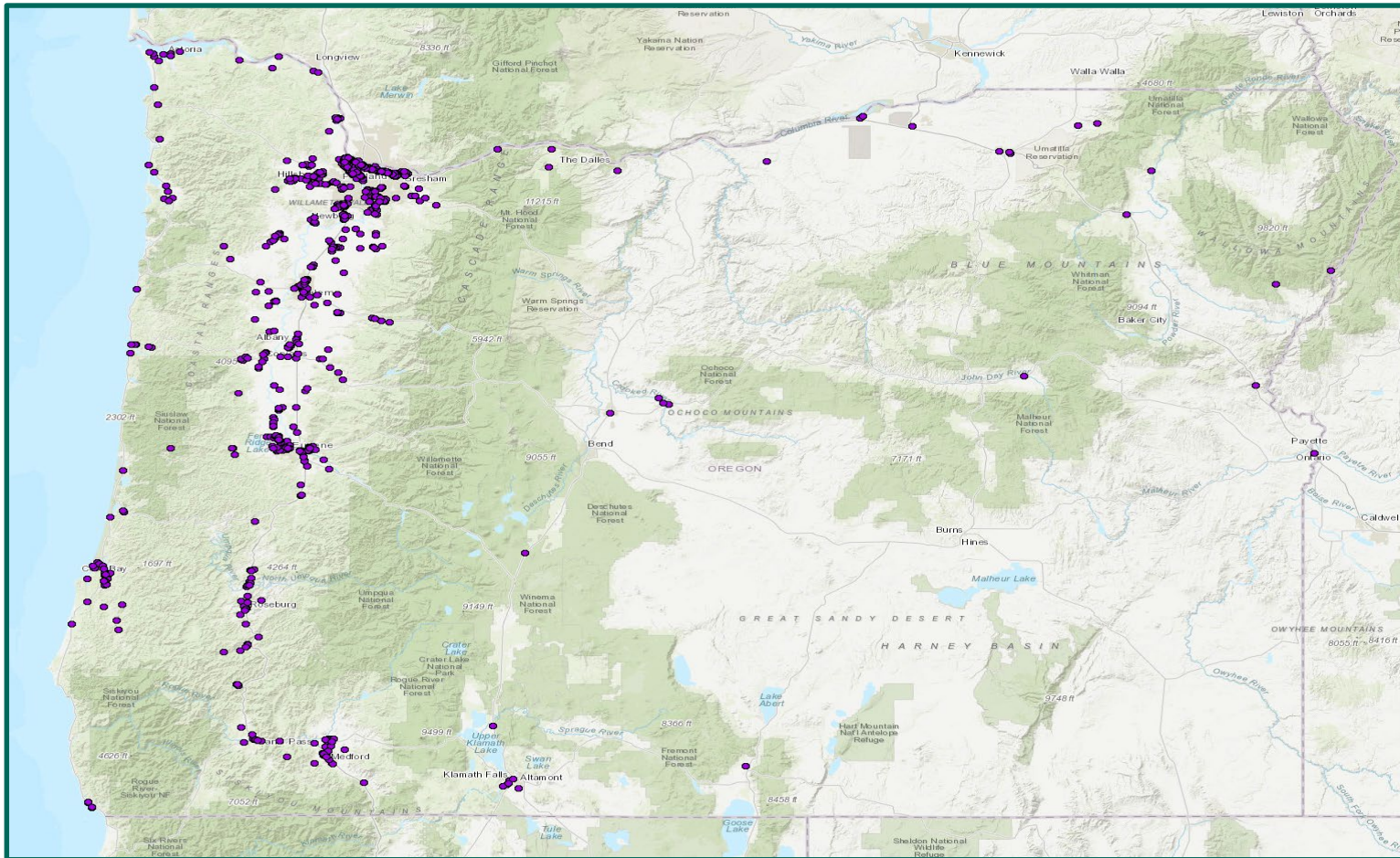
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- Overview of Industrial Stormwater in OR
- Background and Historical Timelines
- Draft Permit (what did not make it)
- The 1200-Z Permit
- Mapping Tools
- Your DEQ Online (electronic reporting)

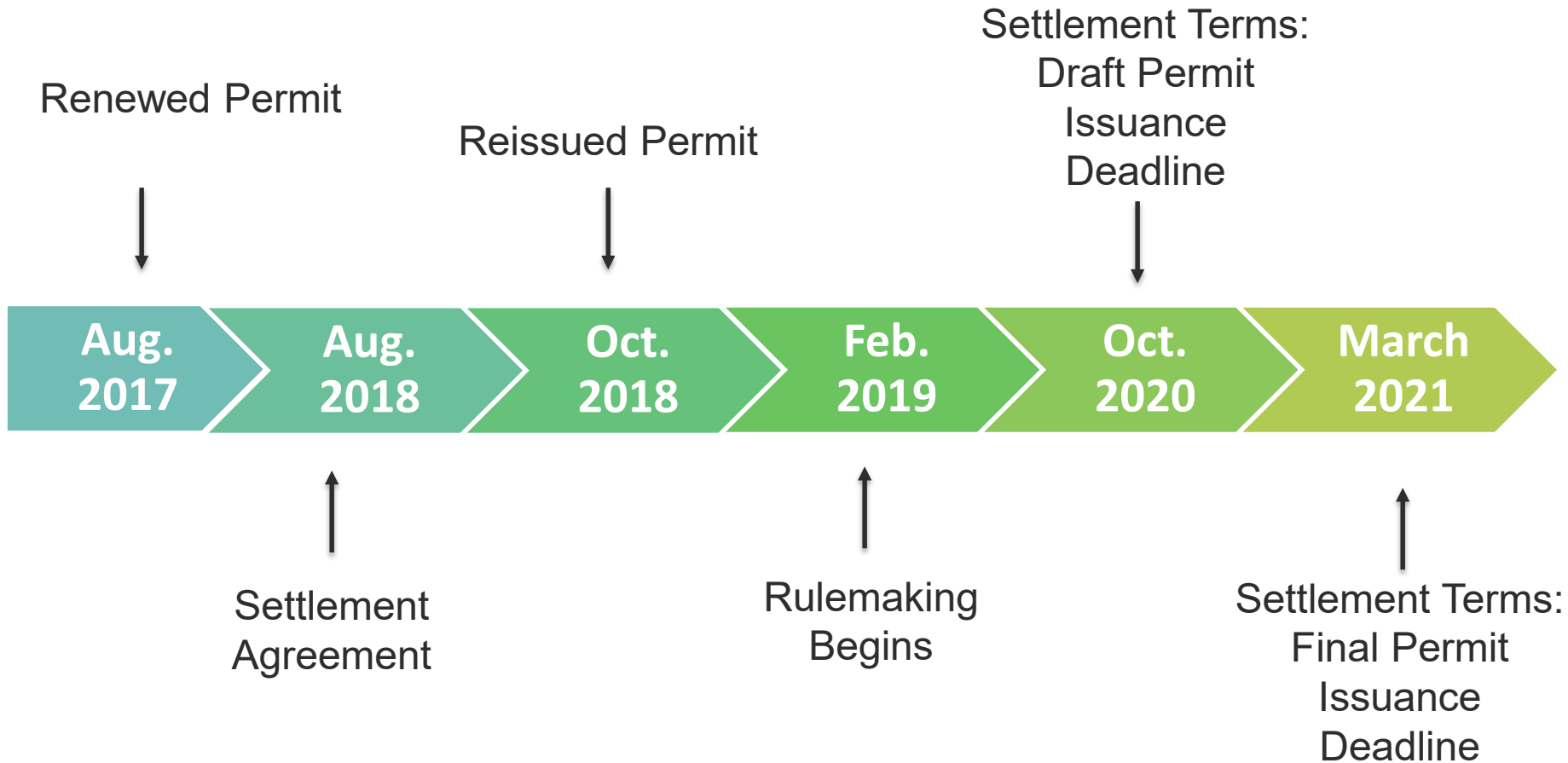
# Industrial Stormwater Regulations



# 1200-Z Permit Overview

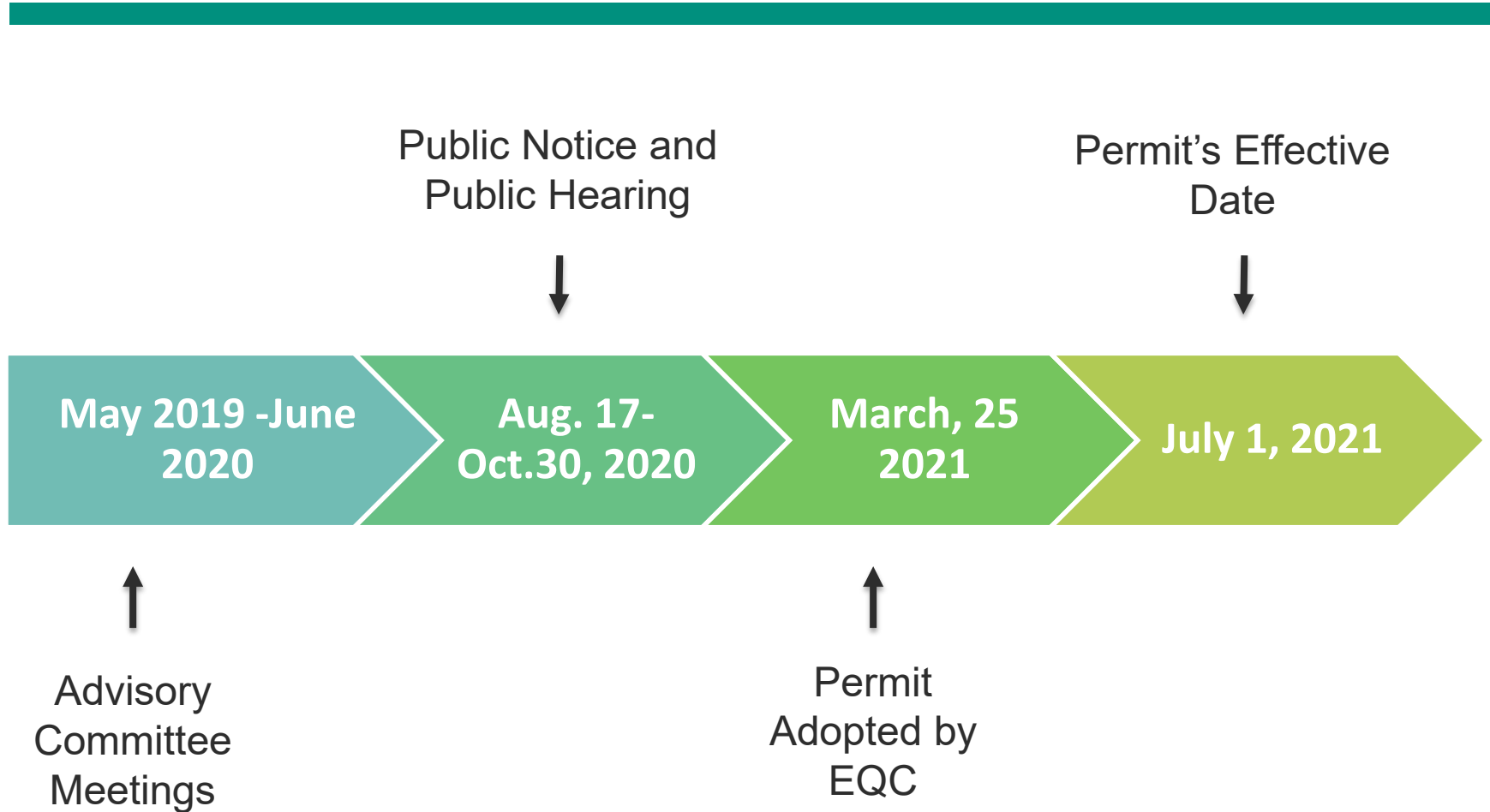


# 1200-Z Background 2017-2021





# 1200-Z Rulemaking Timeline 2019-2021



# Advisory Committee Members

Name	Title	Affiliation	Representing
Ada Banasik	Senior Engineer	Maul Foster & Alongi, Inc.	Consulting
Alan Flemming	Engineer	Kennedy/Jenks Consultants, Inc.	Consulting
Norma Job	Environmental Manager	Ash Grove Cement Company	Industry Representative
Chris Rich	Partner	Perkins Coie, LLP	Industry Representative
Jamie Saul	Staff Attorney	Earthrise Law Center	Columbia Riverkeeper
Jonah Sandford	Staff Attorney	Northwest Environmental Defense Center	Environmental non-profit
Debbie Deetz Silva	Environmental Specialist	EVRAZ NA	Industry
Kathryn VanNatta	Director of Government and Regulatory Affairs	Northwest Pulp and Paper Association	Industry
Michael Campbell	Partner	Stoel Rives, LLP	OISG (Oregon Industrial Stormwater Group)
Stacy Hibbard	Program Manager	City of Portland, Bureau of Environmental Services	DEQ Agent

# Advisory Committee Meetings

- 6 meetings focused on the Settlement Terms:
  - ✓ Review National Academies of Sciences Report on EPA's Permit
  - ✓ Washington State Ecology's Methodology for Numeric Limits (water quality)
  - ✓ Numeric Effluent Limits:
    - i. 303(d) listed impaired waters (water quality)
    - ii. Copper, lead, zinc and TSS (technology-based)
  - ✓ Related monitoring and reporting related to numeric limits or benchmarks

# Rulemaking Record

<https://www.oregon.gov/deq/Regulations/rulemaking/Pages/r1200Z.aspx>

## 1200-Z Industrial Stormwater Discharge Permit Renewal

Rulemaking Home

How To Find Rules And Rulemaking Documents

Search DEQ Rulemaking Documents

Search Official Version Of The Rules

⊕ Petitions For Rulemaking

⊕ Proposed Rules

⊖ 2021 Adopted Rules

- ▶ **1200-Z Industrial Stormwater Discharge Permit Renewal**
- Air Quality Rules To Address Federal Regulations 2020
- Clean Fuels Program Electricity 2021
- Volkswagen Grants 2020
- Waldo And Crater Lakes Outstanding Resource Waters 2020
- Water Quality Permit Fees Correction 2020

⊕ 2020 Adopted Rules

⊕ 2019 Adopted Rules

### Adopted rule

Administrative Order No. [DEQ-6-2021](#)  
Filed and effective: March 25, 2021  
See [Oregon Bulletin, April 2021](#)

The Environmental Quality Commission adopted rules to renew Oregon's industrial stormwater permit, officially called the National Pollutant Discharge Elimination System Stormwater Discharge General Permit No. 1200-Z. This permit regulates stormwater discharges from industrial facilities that may reach Oregon waterways, directly or through conveyance system such as ditches or storm drains. The permit currently covers over 830 industrial facilities in Oregon.

### Advisory committee

DEQ worked with an advisory committee of technical experts to investigate the feasibility of putting new limits on certain contaminants. DEQ also evaluated if it's feasible to set discharge limits based on impaired waterbodies.

✉ [Sign up for text or email updates on the Stormwater program.](#)

[1200-Z Permit Rulemaking Advisory Committee](#)

[1200-Z Permit Rulemaking Advisory Committee Meetings](#)

### Public involvement

The public comment period for this rulemaking closed at 4 p.m. on Oct. 30, 2020.

For more information, see the [Notice of Proposed Rulemaking](#) and supporting documents:

- [Draft Permit Redline](#)
- [Draft Permit Clean](#)
- [Draft Permit Evaluation Report](#)
- [Public Notice Appendix A](#)
- [Public Notice Appendix B](#)

### Public Hearing

Oct. 30, 2020, 12 p.m.

- [Presentation, Sept. 29, 2020](#)
- [Presentation, Oct. 30, 2020](#)

### EQC action

The Environmental Quality Commission adopted these rules at its meeting on March 25, 2021.

Meeting materials:

- [Staff report](#)
- [Attachment A: Proposed rules](#)



# 1200-Z General Permit

<https://www.oregon.gov/deq/wq/wqpermits/Pages/Stormwater-Industrial.aspx>

Department of Environmental Quality / Water Quality / Water Quality Permits / Industrial Stormwater Permits

## Industrial Stormwater Permits

Water Quality Permit Program

WQ Permitting Program Review

NPDES And WPCF Permits

Metal Mining Activities

Stormwater

Stormwater Permit Application  
Forms And Permit Fees

Stormwater Contacts

1200 Series Construction  
Stormwater Permits

**► Industrial Stormwater  
Permits**

Municipal Stormwater Permits

Municipal Stormwater  
Resources

Wastewater Operator Certification  
Program

### Renewed 1200-Z Stormwater Discharge General Permit - Effective July 1, 2021

The Environmental Quality Commission adopted the renewed 1200-Z Industrial Stormwater Discharge General Permit dated March 25, 2021. This permit will be in effect July 1, 2021. This permit regulates stormwater discharges from industrial facilities that may reach Oregon waterways, directly or through conveyance system such as ditches or storm drains.

- [1200-Z Industrial Stormwater General Permit](#)
- [1200-Z Industrial Stormwater Permit Evaluation Report](#)
- [1200-Z Response to Comments](#)
- [1200-Z Summary of Changes](#)
- [Map of 1200-Z 303\(d\) list of impaired waterways](#)
- [2021 Revised SWPCP Checklist](#)

DEQ initiated a rulemaking in April 2019 to renew the 1200-Z permit.

To learn more please visit the [1200-Z Industrial Stormwater Discharge Permit Renewal rulemaking page](#)

# 1200-Z Proposed Draft Permit

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## Proposed Public Notice Draft Permit

- 390 comments from 37 entities
- DEQ made modification based on 143 comments
- All comments considered
- Some proposed permit conditions were NOT finalized
- EPA's MSGP final permit timing

# 1200-Z Proposed Draft Permit cont.

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## Draft Permit Conditions NOT Finalized

- Tier 1.5 and Appendix B
- Sampling frequency 72 hours between collection
- Sector-specific benchmarks for Sectors O, P, R
- EPA's MSGP final permit conditions
- Quarterly sampling\*

\*inserted after presentation

# Assignment Procedures

**Continue to operate and monitor under the 2018 permit until July 1, 2021**

Dear «Addressee»:

On March 25, 2021, the Oregon Environmental Quality Commission adopted a revised National Pollutant Discharge Elimination System Industrial Stormwater Discharge General Permit No. 1200-Z.

Coverage under the renewed 2021 permit will become effective on **July 1, 2021**; at such time, all existing facilities must comply with the renewed permit conditions. The 2018 permit will no longer be in effect as of July 1, 2021. **All existing permit registrants with approved monitoring waivers must reinstate monitoring on July 1, 2021.** DEQ or agent will identify and communicate monitoring requirements under the 2021 permit.



# Assignment Procedures cont.

Will not receive 1<sup>st</sup> page of the permit with specific facility information

## GENERAL PERMIT

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
INDUSTRIAL STORMWATER DISCHARGE PERMIT No. 1200-Z

Department of Environmental Quality

700 NE Multnomah St., Suite #600 Portland, OR 97232

Telephone: (503) 229-5630 or 1-800-452-4011 toll free in Oregon

Issued pursuant to ORS 468B.050 and the Federal Clean Water Act

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REGISTERED TO: File #106854

Krista Ratliff Industries  
1234 Main St.  
Bend, OR 97701

Date Issued: July 1, 2021

Deschutes County

EPA# OR102154

LLID: 123456789123

River Mile: 1.0

AUID: 104254

# Assignment Procedures cont.

Georegion	Pollutant	Statewide Benchmark	Unit	Frequency
	Total Copper	No statewide benchmark if impairment monitoring for copper, lead, zinc, pH	mg/L	Four times per year
	Total Lead		mg/L	Four times per year
	Total Zinc		mg/L	Four times per year
	pH		s.u.	Four times per year
	TSS		mg/L	Four times per year

SIC code of Industrial Activity	Pollutant	Sector-specific Benchmark	Units	Frequency
		No sector-specific benchmark if impairment or statewide benchmark for same pollutant		Four times per year

Receiving Water LLID: AUD: River Mile:	Pollutant	Impairment Concentration	Units	Frequency
				Four times per year

Technology-based Effluent Limit	Pollutant	Numeric Effluent Limit	Units	Frequency
				Two times per year

# 1200-Z General Permit

Permit Number: 1200-Z  
Effective: August 1, 2017  
Reissuance: October 22, 2018  
Expiration: ~~July 31, 2022~~

GENERAL PERMIT  
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
STORMWATER DISCHARGE GENERAL PERMIT No. 1200-Z

Department of Environmental Quality

700 NE Multnomah St., Suite #600 Portland, OR 97232

Telephone: (503) 229-5630 or 1-800-452-4011 toll free in Oregon

Issued pursuant to ORS 468B.050 and the Federal Clean Water Act

## SOURCES COVERED UNDER THIS PERMIT:

A facility that may discharge industrial stormwater to surface waters or to conveyance systems that discharge to surface waters of the state

# 1200-Z Statewide Benchmarks

- Expanded geo-regions
- Removed oil and grease
- Re-calculated (marine waters)
- Regional translators (dissolved to total)
- E. coli moved to sector E (treatment works and landfills)



# 1200-Z Statewide Benchmarks

Georegion	pH s.u.	Total Copper mg/L	Total Lead mg/L	Total Zinc mg/L	TSS mg/L	BOD mg/L	Total Phosphorus mg/L	E. coli organism/100 mL
Columbia Slough	5.5-9.0	0.017 <sup>2</sup>	0.10 <sup>2</sup>	0.24 <sup>2</sup>	30	24	0.16	406 <sup>1</sup>
Portland Harbor	5.5-9.0	0.015 <sup>2</sup>	0.24 <sup>2</sup>	0.24 <sup>2</sup>	30			
Cascades	5.5-9.0	0.016	0.018	0.068	100			
Coastal	5.5-9.0	0.017	0.039 <sup>2</sup>	0.086	100			
Columbia River Mainstem	6.0-9.0	0.023	0.21	0.35	100			
Eastern	5.5-9.0	0.031	0.077 <sup>2</sup>	0.16	100			
Willamette Valley	5.5-9.0	0.015 <sup>2</sup>	0.11 <sup>2</sup>	0.14 <sup>2</sup>	100			
Marine Waters	6.0-9.0	0.025	1.10	0.46	100			

# Statewide Benchmark Exceedance

Statewide Benchmarks:  
Copper, lead, zinc, pH, TSS  
Columbia Slough: BOD, P, E. coli

Exceedance Response: Tier 1 and Industrial checklist (optional)  
Continue monitoring at minimum one full year and until eligible for waiver

Evaluate Tier 2 geometric mean each Aug. 15  
Re-evaluate geomean annually, unless triggered Tier 2  
Install Tier 2 at substantially similar

# 1200-Z Sector-specific Benchmarks

- Re-calculated (OR water quality standards)
- E. coli moved to sector E (treatment works and landfills)
- Saltwater benchmarks
- No additional benchmarks



# Sector-specific Benchmark Exceedance

## Sector-Specific Benchmarks:

Many revised concentrations

Metals concentration calculated using median\* hardness

No sector benchmarks for same pollutants statewide benchmarks



Exceedance Response: Tier 1 and Industrial checklist (optional)

Continue monitoring at minimum one full year and until eligible for waiver

\*correction: median instead of mean as presented in webinar



# 1200-Z Impairment Monitoring

Applicable to discharges into Category 5: 303(d) listed waters

- Narrowed pollutant list
- Re-calculated (median hardness)
- No more Tier 1



New Integrated Report (2018/2020)

# 1200-Z Impairment Monitoring

## Discharge to Category 5: 303(d) list

### Numeric water-quality based effluent limit

2 consecutive exceedances or 1 sample is greater than 2 times\*

Total copper

Total lead

Total zinc

pH

### Narrative water-quality based effluent limit

2 consecutive exceedances

Total iron

E. coli

\*inserted after presentation

# 1200-Z Impairment Monitoring

Discharge to Category 5: 303(d) list

A new framework for managing elevated levels of:

- copper
- lead
- zinc
- pH



# 1200-Z Impairment Monitoring

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Discharge to Category 5: 303(d) list

Fecal coliform and Enterococcus sampling

- Monitor 4 x year and report on DMR until eligible for waiver
- Currently use E. coli as surrogate (discontinuing)
- Could require narrative water quality-based effluent limits \*same as E. coli (if public health risk identified from discharge)

# 1200-Z Impairment Monitoring

Georegion	Total Copper mg/L	Total Lead mg/L	Total Zinc mg/L
Columbia Slough	0.017 <sup>2</sup>	0.017 <sup>2</sup>	0.042 <sup>2</sup>
Portland Harbor	0.015 <sup>2</sup>	0.017 <sup>2</sup>	0.041 <sup>2</sup>
Cascades	0.016	0.006	0.021
Coastal	0.017	0.017 <sup>2</sup>	0.043
Columbia River Mainstem	0.023	0.046	0.082
Eastern	0.031	0.037 <sup>2</sup>	0.070
Willamette Valley	0.015 <sup>2</sup>	0.027 <sup>2</sup>	0.057 <sup>2</sup>
Marine Waters	0.0058	0.22	0.095

pH concentrations Basin-specific OAR 340-041-0101 through 340-041-0350: Appendix A

# Impairment Exceedance

Discharge into 303(d) list receiving stream  
Monitor for: Zinc, copper, lead, and pH  
At concentrations Table 5 specific to georegion

Exceed once or non-consecutive – no Tier 1  
Continue to monitor unless until eligible for waiver

Trigger water quality-based effluent limit  
Request compliance schedule (Follow Sch. C)  
Continue monitoring – no waiver

# Compliance Schedule

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Trigger numeric water-quality based effluent limit (exceed 2 consecutive sample results) Sch. A.13

Must:

- Make site changes as soon as possible to control discharge
- Request compliance schedule no later than 30 days
- Meet all Sch. C Milestones (Table 9)
- Must achieve concentrations within 2-years

# Numeric WQBEL

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Impairment monitoring escalates to limit

- Same concentration, decrease frequency 2 x year
- Must meet consistently or violation
- Must sample all substantially similar discharge locations
- No monitoring waiver
- May be require coverage under individual permit



# 1200-Z Impairment Monitoring

Discharge to Category 5: 303(d) list

A new framework for managing elevated levels of:

- Total iron
- E. coli



# Narrative WQBEL

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## Mandatory BMPs and Operational Source Control

- Same concentration: continue monitoring 4 x year
- Complete 90 days from sample results
- Continue annual on-going controls
- May be require coverage under individual permit
- Eligible for monitoring waiver

# Narrative WQBEL

Table 5A: Impairment Monitoring Concentrations

<b>Impairment Pollutant</b>	<b>Impairment Concentrations</b>
E. coli	406 organisms/100 mL
Total iron	10 mg/L

# Impairment Exceedance

Discharge into 303(d) list receiving stream  
Monitor for: E. coli and iron

Exceed once or non-consecutive – no Tier 1  
Continue to monitor unless until eligible for waiver

Trigger narrative water quality-based effluent limit  
Implement operation and source control  
Continue monitoring until eligible for waiver

# More Monitoring Changes

Statewide benchmark:

Columbia Slough:

- biochemical oxygen demand (BOD<sub>5</sub>) decrease based on loading from TMDL\*

Columbia River:

- pH range narrowed for Columbia R. georegion



\*Total Daily Maximum Load

# More Monitoring Changes

## Monitoring waiver:

- All monitoring must be reinstated on July 1, 2021
- Geometric mean of 5 samples (instead of 4)
- May not request prior to a full reporting year (July 1 – June 30)
- Different criteria for impairment vs. benchmarks



# More Monitoring Changes cont.

## Monitoring waiver:

- Must monitoring last year of permit cycle (July 1, 2025 – June 30, 2026)
- Still must monitor until approved, must reinstate as required by permit
- Electronic DMRs coming soon... (except in agents jurisdictions)



# Visual Observations (Monitoring)

Must pull a sample at all discharge locations:

- Observe in well-lit area, during discharge event
- Modifications available for exceptionally large facilities
- Document within inspection report
- No reduction in monitoring (visual observations)





# Mass Reduction Measures Certification

New requirements for infiltration devices applicable to:

- Infiltrating at or above DEQ-approved design storm (half 2-yr. 24-hour rain event) or local criteria
- Either response to Tier 2 mass reduction waiver or otherwise (previous permit cycles)
- Hire PE or CEG to ensure infiltration/maintenance



# 1200-Z Mass Reduction Measures Deadlines

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- December 31, 2021: submit certification
  - 60 calendar days: DEQ or Agent approve/deny
  - September, 30, 2022: complete maintenance required by certification
  - Once approved: discontinue sampling
- \* Do not use sample results from properly maintained mass reduction measures for geometric mean calculations

# Corrective Action Response

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## Tier 1:

- Any sample result exceed benchmarks (statewide and sector-specific)
- Tier 1 Report
- Industrial-specific checklist (optional)
- Same deadlines
- Retain on site

# Corrective Action Response

## Tier 2:

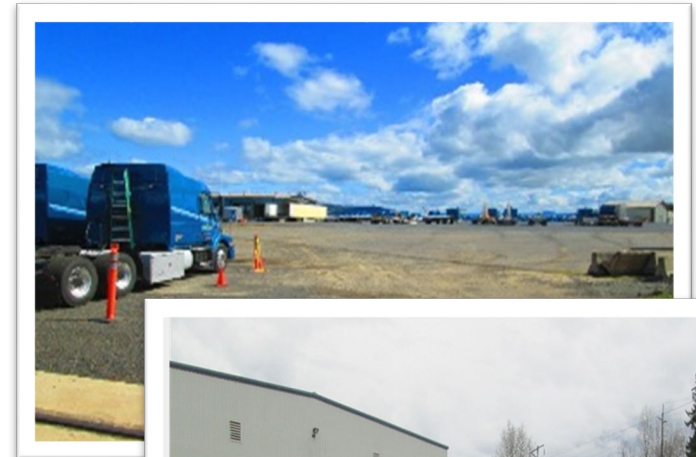
No more second-year of coverage geometric mean evaluation

- Statewide benchmarks only
- Geometric mean calculation at every monitoring point
- Reported every Aug. 15
- Implementation deadline extended Sept. 30 (a year and 9 months after trigger)

# Transportation Sectors

Expanded regulated area for transportation sector facilities exposed to industrial activities:

- Railroads
- Local and highway passenger
- Trucking and courier services
- Warehousing and storage
- Marinas
- Airports
- Transfer stations
- Mail, package delivery services



# Revise SWPCP

Must revise stormwater pollution control plan by:

Aug. 31, 2021

Don't forget to include checklist!



## DEQ 2021 Industrial Stormwater Permit Stormwater Pollution Control Plan Check List

**Instructions:** Complete this form and submit with SWPCP. Fill in the appropriate page number(s) indicating the location of information in the SWPCP. At a minimum, the SWPCP must include the components below and describe how the permit registrants intends to comply with the narrative technology-based effluent limit to eliminate or reduce the potential to contaminate stormwater and prevent any exceedance of instream water quality standards.

Site Name:		File No.:	
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# Impairment Mapping

<https://www.oregon.gov/deq/wq/Pages/epaApprovedIR.aspx>


## EPA Approved Integrated Report

- Water Quality Home
- Water Quality Index
- Is It Safe To Swim On The Willamette River In Portland?
- Willamette River Report Card
- Harmful Algal Blooms
- Harmful Algal Blooms: Drinking Water Cyanotoxin Monitoring
- Water Quality Assessment
  - Water Quality Assessment Program
  - **EPA Approved Integrated Report**
  - Proposed Integrated Report
  - Assessment Methodology

### Current action

The 2018/2020 Integrated Report was approved by the U.S. Environmental Protection Agency on Nov. 12, 2020 and is now current and in effect. The federal Clean Water Act requires Oregon to report on the quality of its surface waters every two years. Although not a written report, the Integrated Report is a reporting of the status of water quality in Oregon and a list of waters considered to be impaired. See the [Water Quality Assessment page](#) for more information.

### The Integrated Report can be accessed in four ways:

- An [interactive story map](#) provides an overview of the water quality assessment process and displays results in terms of supporting beneficial uses.
- An [interactive web map application](#) displays the Integrated Report by overall status of an assessment unit. For example, if an assessment unit is classified as impaired, one or more assessed pollutants do not meet the interpretation of water quality standards outlined in the methodology. The application also provides all applicable Water Quality Standards and TMDL information. [Instructions for the web map application](#) .

### Contact

For more information on the Integrated Report please contact:

[Becky Anthony](mailto:Becky.Anthony@deq.state.or.us)  , 503-378-5319

[Interactive Story Map](#)

[Interactive Web Map](#)

[Assessment Database](#)

[Assessment Geodatabase](#)

[AWQMS](#)

Contact: [becky.anthony@deq.state.or.us](mailto:becky.anthony@deq.state.or.us)



# Impairment Database

## Assessment Database

2018/2020 Integrated Report



**Filter**

Select Assessment Unit

Select AU Name

Select Admin Basin

Select Pollutant

Select IR category

Select Parameter Attainment Status

Select Beneficial Use

Instructions | Assessments

[Download Assessment Results](#)

AU_ID	AU_Name	AU_Description	OWRD_Basin	Assessment	IR_category
OR_SR_1709000306_05_103854	Willamette River	confluence of Middle Fork Willamette River and Coast Fork Willamette River to Luckiamute River	Willamette	Aquatic Weeds	Category 5
OR_SR_1709000306_05_103854	Willamette River	confluence of Middle Fork Willamette River and Coast Fork Willamette River to Luckiamute River	Willamette	BioCriteria	Category 5





# Impairment Mapping



104515



Sign in

Navigation

Tools



Tool Labels



Bookmarks



Initial View



Zoom In



Zoom Out



Pan



Previous Extent



Next Extent

Layers



Filter Layers...



Filter

2018/2020 Integrated Report

Monitoring Stations

Assessment Unit Status

2018/2020 Waterbody Status

2018/2020 Status

River/Stream & Coast Line

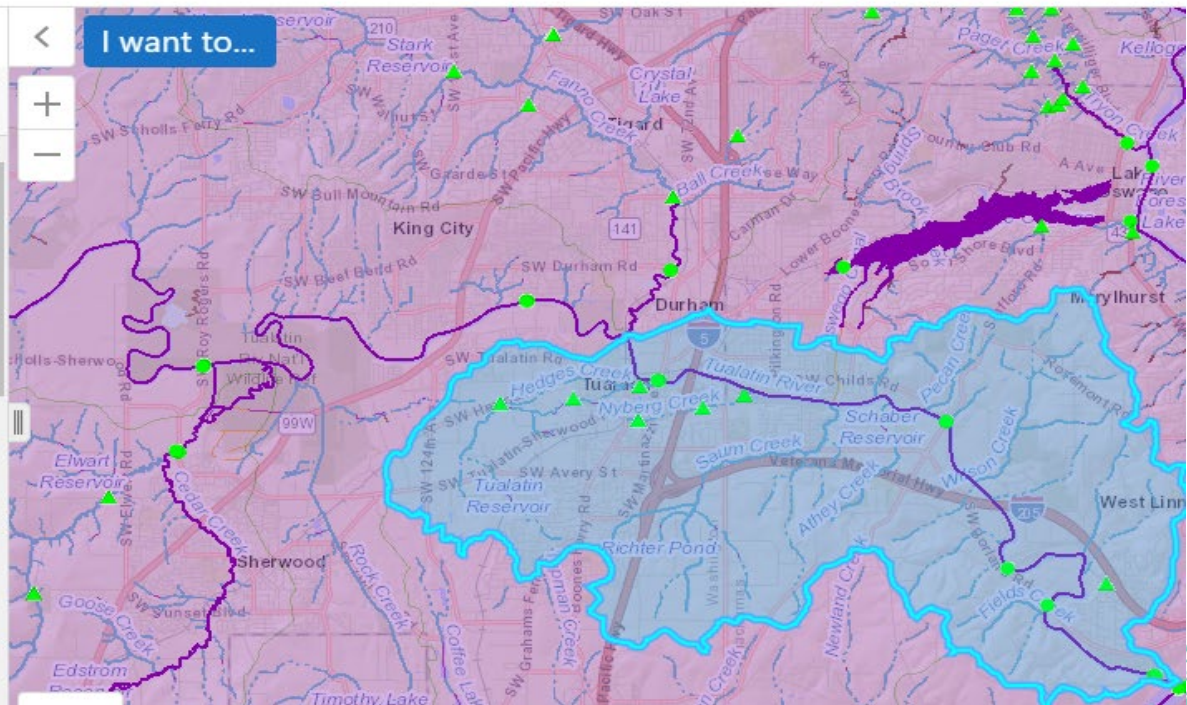
2018/2020 Watershed

Assessment Status

Unassessed Assessment Units

Delistings

Oregon Assessment Units



# Impairment Mapping

<https://hdcgcx2.deq.state.or.us/Html5Viewer211/?viewer=1200Z>

Oregon Department of Environmental Quality

1200-Z Permitted Facilities Information Map

Search...



Sign in

Navigation

Tools



Tool Labels



Home



Zoom In



Zoom Out



Initial View



Previous Extent



Next Extent

Layers

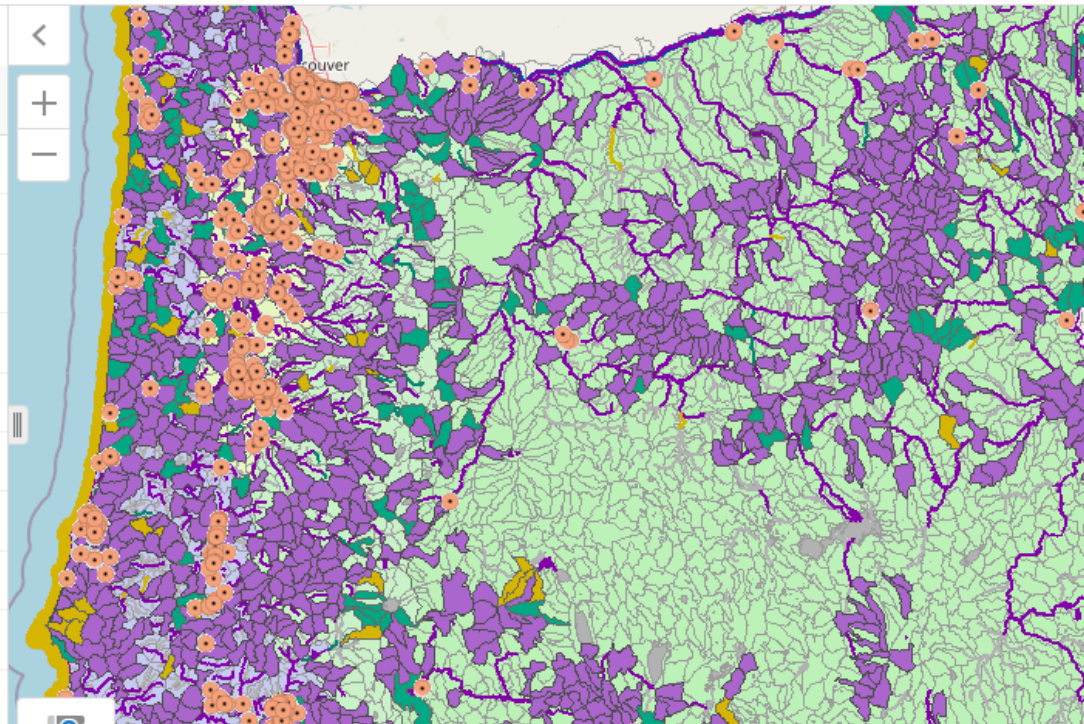


Filter Layers...



Filter

- 1200-Z Permitted Facilities
- Hydrography
- Integrated Report Assessment Units
- ODA Shellfish Program
- Administrative Boundaries
- Transportation
- Oregon Watershed Boundaries
- Georegions
- Annual Precipitation
- Base Maps



# Electronic DMRs

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- Replace monitoring tables
- No more paper DMRs
- Agents (continue to submit as usual)



# Electronic Reporting... and more


## Submission and renewal



Submit or renew applications, permits, certifications, licenses, complaints and more.

## E-Payments



Pay invoices, fees, penalties, and other payments online using an e-check or credit card. **Fact sheet:** [Payment options](#) 

## Dashboard



Check the status of submitted applications, upcoming reporting obligations, permit/license renewal dates, scheduled inspections, pay invoices online, or correspond with DEQ.

## Access to published records



Easily access to published records such as permits, licenses and other public information.



# 1200-Z Permit 2021-2026

## Questions?



# Informational Webinar

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[krista.ratliff@deq.state.or.us](mailto:krista.ratliff@deq.state.or.us)

503-893-0669

Thank you for attending!

Out of office most of June

