



RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

RIPDES 2024
MULTI-SECTOR GENERAL PERMIT (MSGP)


PERMIT COMPLIANCE TRAINING

JANUARY 2025





WORKSHOP AGENDA

1. INTRODUCTIONS & MEETING LOGISTICS
 2. IMPORTANT REMINDERS & DEADLINES
 3. 2024 MSGP REQUIREMENTS
 4. 10 MINUTE BREAK
 5. ELECTRONIC REPORTING
 6. QUESTIONS & ANSWERS
- 

RIPDES MUNICIPAL AND INDUSTRIAL STORMWATER TEAM

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RIPDES 2024 MSGP IMPORTANT REMINDERS

- Permit effective September 1, 2024; Renewal NOI submissions were due **November 30, 2024**
- 2024 Annual Report Submission due **January 30, 2025**
- Analytical monitoring: Between July 1-December 31, 2024, analytical monitoring was **NOT** required
 - Exception: Effluent Limitations Guidelines (ELG) monitoring was required in 2024, and results must be reported with the 2024 Annual Report submission. This only applies to 2024 reporting year due to limitations caused by the permit reissuance process. ELG data via DMR submissions will be required after January 1, 2025.
 - All other permit requirements were in effect, including:
 - Quarterly Inspections
 - Quarterly Visual Assessments
 - Corrective Action Reports (as applicable)
- Analytical monitoring will be required for all permittees beginning January 1, 2025
- MSGP Annual Fee due **July 15, 2025**
 - Permittees will receive an invoice from NeT with payment instructions around May 15, 2025

RIPDES 2024 MSGP ELECTRONIC APPLICATIONS

NET-MSGP DEADLINES

Notice of Intent (NOI)	No Discharge Certification (NDC)	No Exposure Certification (NEC)
<ul style="list-style-type: none"> For facilities <i>previously authorized</i> to discharge under the 2019 MSGP, Renewal NOI submissions via NeT-MSGP were due <u>November 30, 2024</u> For <i>new facilities</i>, NOI submissions via NeT-MSGP are due <u>60 days prior</u> to commencing discharge of industrial stormwater 	<ul style="list-style-type: none"> NDC submissions via NeT-MSGP are not mandatory Once an NDC is submitted it <u>will not expire</u> Facilities should review their NDC status periodically to verify that an MSGP authorization is not required 	<ul style="list-style-type: none"> NEC submissions via NeT-MSGP <u>expire once every 5 years</u> Renewal reminders are sent via NeT-MSGP automatically 6 months in advance Note: Permit coverage must be terminated, if applicable, prior to submitting a NEC

RIPDES 2024 MSGP REQUIREMENTS

Develop site-specific Stormwater Management Plan (SWMP)

Monitoring

Quarterly Visual Assessments

Routine Quarterly Inspections

Recordkeeping Requirements

Tiered Corrective Action Requirements

Electronic Reporting (NeT-DMR & NeT-MSGP)

RIPDES 2024 MSGP
SWMP
REQUIREMENTS
PART V.

Stormwater Pollution Prevention Team (Part V.F.1.)

Site Description (Part V.F.2.)

Receiving Waters and Wetlands (Part V.F.3.)

Summary of Potential Pollutant Sources (Part V.F.4.)

Description of Control Measures (Part V.F.5.)

Schedules and Procedures (Part V.F.6.)

Permit Eligibility Related to Endangered Species (Part V.F.7.)

Applicable State or Local Plans (Part V.F.8.)

Copy of Permit Requirements (V.F.9.)

Signature Requirements (Part V.F.10.)

RIPDES 2024 MSGP NEW SWMP REQUIREMENTS

Per- and Polyfluoroalkyl Substances (PFAS) Storage and Release – Part II.A.2.I.



- Evaluate whether the facility uses or has historically used any products containing PFAS
- Identify PFAS containing materials in the SWMP along with an evaluation as to whether or not PFAS alternatives are available
- Implement PFAS BMPs and pollution prevention strategies

Minimizing Stormwater Impacts from Major Storm Events – Part II.A.4.

- Develop strategies in the SWMP to minimize pollution potential, examples to consider:
 - Temporarily storing materials and potential pollutants above the Base Flood Elevation (BFE) level
 - Reinforcing materials storage structures to withstand flooding and additional exertion of force
 - Temporarily reducing or eliminating outdoor storage
 - Plan for future site improvements, considering facility location and storm event risks



RIPDES 2024 MSGP MONITORING REQUIREMENTS

WHERE DO I SAMPLE?

1. Identify outfall/discharge point(s) at the facility
 - What is an outfall/discharge point? – the location where collected and concentrated stormwater flows are discharged from the facility such that the first receiving waterbody into which the discharge flows, either directly or through a separate storm sewer system, is a water of the State.
2. Determine whether the facility has any substantially identical outfalls
 - What is a substantially identical outfall? – Two or more outfalls that have the same effluent discharges.
3. Determine appropriate sampling locations
 - Refer to videos on RIPDES MSGP webpage (www.dem.ri.gov/MSGP) for guidance

Guidance and Compliance Assistance

- [Frequently Asked Questions for Multi-Sector General Permittees](#)
- [SIC Manual](#) [↗]
- [EPA Industrial SWPP Guidance](#) [↗]
- [EPA Industrial Stormwater Monitoring and Sampling Guide](#) [↗]
- **Sampling Guidance Videos** (courtesy of MN Pollution Control Agency)
 - [How to Collect a Grab Sample](#) [↗]
 - [Identifying SW Monitoring Locations](#) [↗]

RIPDES 2024 MSGP MONITORING

PART VI.B.

Benchmarks

- Universal [TSS + Oil & Grease]
- Sector Specific [Part VIII. of MSGP]

Annual Effluent Limitations Guidelines (ELGs)

- Sectors A, C, D, E, J, K, L, O, & S

Impaired Waters

- Based on receiving water quality assessment [303(d) list]

Indicator

- Sectors M, P, Q, R, and AA [Total Copper]
- Sector P [Enterococcus]

Other

- As required by DEM

RIPDES 2024 MSGP SAMPLING PROCEDURES

PART VI.A.

- Prepare – reach out to a certified laboratory. Most laboratories will provide bottles ahead of time. This allows you to have the bottles onsite for any rainstorm
- Grab Sample – storm event results in a measurable discharge and follows preceding measurable storm event by at least 48 hours of dry weather
- Samples must be collected within the first 30 minutes of a measurable storm event
- Samples must be analyzed consistent with 40 CFR Part 136 analytical methods and using test procedures and quantitation limits at or below benchmark values
- When more than one type of monitoring for the same parameter at the same outfall applies, the permittee may use a single sample to satisfy both monitoring requirements



Stormwater samples packed for delivery to the lab, note the chain of custody forms attached to the lid.



RIPDES 2024 MSGP MONITORING FREQUENCY

PART VI.A.

BENCHMARK, IMPAIRED WATERS, & INDICATOR MONITORING

- FREQUENCY: 4x per year
 - 2x January 1–June 30; 2x July 1–December 31
 - Minimum of 30 days between each sampling event
 - Minimum of 48 hours of dry weather prior to each sampling event

ANNUAL EFFLUENT LIMITATIONS GUIDELINES (ELG) MONITORING

- FREQUENCY: 1x per year
 - Minimum of 48 hours of dry weather prior to each sampling event

In 2023, RI had between 3-5 measurable storm events (≥ 0.1 inches of precipitation) per month that were separated by 48 hours of “dry” period

Month	Jan	Feb	Mar	Apr	May	Jun	July	Aug	Sep	Oct	Nov	Dec
# of Measurable Storm Events	4	3	4	4	3	4	5	5	4	4	5	4

RIPDES 2024 MSGP BENCHMARK MONITORING WHAT DO I SAMPLE FOR? PART VI.B.1. & VIII.

- **Universal Benchmarks** (applies to ALL permittees)
 - TSS
 - Oil & Grease
- **Sector Specific** (refer to Part VIII. of 2024 MSGP)
 - Some metals benchmarks are hardness dependent (i.e. Cadmium, Copper, Lead, Nickel, Silver, and Zinc)
 - Hardness monitoring and reporting is only required for new applicants if specified by their sector
 - For guidance refer to Appendix D – Calculating Hardness In Receiving Waters For Hardness Dependent Metals

VIII.C. Subpart C – Sector C - Chemical and Allied Products Manufacturing, and Refining.

VIII.C.3. Sector-Specific Benchmarks. Table VIII.C-1 identifies benchmarks that apply to the specific subsectors of Sector C. These benchmarks apply to both the primary industrial activity and any co-located industrial activities.

Subsector (The facility may be subject to requirements for more than one sector/subsector)	Parameter	Benchmark Monitoring Concentration
Subsector C1. Agricultural Chemicals (SIC 2873-2879)	Nitrate plus Nitrite Nitrogen	0.68 mg/L
	Total Lead ¹ (fresh water discharges)	Hardness Dependent
	Total Lead (salt water discharges)	0.21 mg/L
	Total Zinc ¹ (fresh water discharges)	Hardness Dependent
	Total Zinc (salt water discharges)	0.09 mg/L
	Phosphorus	2.0 mg/L
Subsector C2. Industrial Inorganic Chemicals (SIC 2812-2819)	Total Aluminum	0.75 mg/ L
	Nitrate plus Nitrite Nitrogen	0.68 mg/L
Subsector C3. Soaps, Detergents, Cosmetics, and Perfumes (SIC 2841-2844)	Nitrate plus Nitrite Nitrogen	0.68 mg/L
	Total Zinc ¹ (fresh water discharges)	Hardness Dependent
	Total Zinc (salt water discharges)	0.09 mg/L
Subsector C4. Plastics, Synthetics, and Resins (SIC 2821-2824)	Total Zinc ¹ (fresh water discharges)	Hardness Dependent
	Total Zinc (salt water discharges)	0.09 mg/L

¹ The benchmark values of some metals are dependent on water hardness for fresh water discharges. For these parameters, permittees must determine the hardness of the receiving fresh water body (see Appendix D, "Calculating Hardness in Receiving Waters for Hardness Dependent Metals," for methodology), in accordance with Part VI.B.1.a., to identify the applicable 'hardness range' for determining their benchmark value applicable to their facility. The ranges occur in 25 mg/L increments. Hardness Dependent Benchmarks follow in the table below:

Water Hardness Range	Lead (mg/L)	Zinc (mg/L)
0-25 mg/L	0.014	0.04
25-50 mg/L	0.023	0.05
50-75 mg/L	0.045	0.08
75-100 mg/L	0.069	0.11
100-125 mg/L	0.095	0.13
125-150 mg/L	0.122	0.16
150-175 mg/L	0.151	0.18
175-200 mg/L	0.182	0.20
200-225 mg/L	0.213	0.23



RIPDES 2024 MSGP BENCHMARK MONITORING

PART VI.B.1.

- After 1 year of samples, if the average of the 4 monitoring values for any parameter DOES NOT EXCEED the benchmark value, the permittee may discontinue monitoring
 - If <4 samples were collected for any parameter in the year, the permittee must continue semiannual benchmark monitoring
- After 1 year of samples, if the average of the 4 monitoring values for any parameter EXCEEDS the benchmark value, the permittee must implement corrective actions and continue monitoring (unless due to natural background sources)
 - If <4 samples were collected for any parameter in the year, and the average of the remaining monitoring values results in a mathematical certainty that the benchmark value would be exceeded, the permittee is considered to have triggered the need for corrective actions and must continue monitoring

RIPDES 2024 MSGP

NATURAL BACKGROUND POLLUTANT LEVELS

WHAT ARE THEY?

PART VI.B.1.E.

- Those substances that are naturally occurring in soils or groundwater
- Natural conditions are those that are not caused by humans and can alter a waterway's physical, biological or chemical makeup (i.e., wildfires, floods, wind, insect infestation, and diseased vegetation)
- Natural background pollutants do not include legacy pollutants from earlier activity on the site, or pollutants in run-on from neighboring sources which are not naturally occurring



RIPDES 2024 MSGP

ANNUAL EFFLUENT LIMITATIONS GUIDELINES (ELG) MONITORING

WHO DOES THIS APPLY TO?

PART VI.B.2.

Regulated Discharge	MSGP Sector
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	A
Runoff from phosphate fertilizer manufacturing facilities that comes into contact with any raw materials, finished product, byproducts or waste products (SIC 2874)	C
Runoff from asphalt emulsion facilities	D
Runoff from material storage piles at cement manufacturing facilities	E
Mine dewatering discharges at crushed stone, construction sand and gravel, or industrial sand mining facilities	J
Runoff from hazardous waste and non-hazardous waste landfills	K, L
Runoff from coal storage piles at steam electric generating facilities	O
Runoff containing urea from airfield pavement deicing at existing and new primary airports with 1,000 or more annual non-propeller aircraft departures	S

RIPDES 2024 MSGP

ANNUAL EFFLUENT LIMITATIONS GUIDELINES (ELG) MONITORING

WHAT DO I SAMPLE FOR?

PART VIII.

- To find what effluent limitation to monitor for, go to Part VIII. Sector-Specific Requirements For Industrial Activity.
- If an effluent limitation applies, it will be listed in a table as part of the industrial sector specific requirements.
- Substantially identical outfalls are not available for ELGs

VIII.A. Subpart A – Sector A – Timber Products.

The permittee must comply with Part VIII. sector-specific requirements associated with the facility's primary industrial activity and any co-located industrial activities, as defined in Appendix A. The sector-specific requirements apply to those areas of the facility where those sector-specific activities occur. These sector-specific requirements are in addition to any requirements specified elsewhere in this permit.

VIII.A.7. Effluent Limitations Based on Effluent Limitations Guidelines. (See also Part VI.B.2.a. of the permit.) Table VIII.A-2 identifies effluent limits that apply to the industrial activities described below. Compliance with these effluent limits is to be determined based on discharges from these industrial activities independent of commingling with any other waste streams that may be covered under this permit.

Table VIII.A-2 ¹		
Industrial Activity		
Discharges resulting from spray down or intentional wetting of logs at wet deck storage areas	pH	6.0 - 9.0 s.u.
	Debris (woody material such as bark, twigs, branches, heartwood, or sapwood)	No discharge of debris that will not pass through a 2.54-cm (1-in.) diameter round opening

¹Monitor Annually

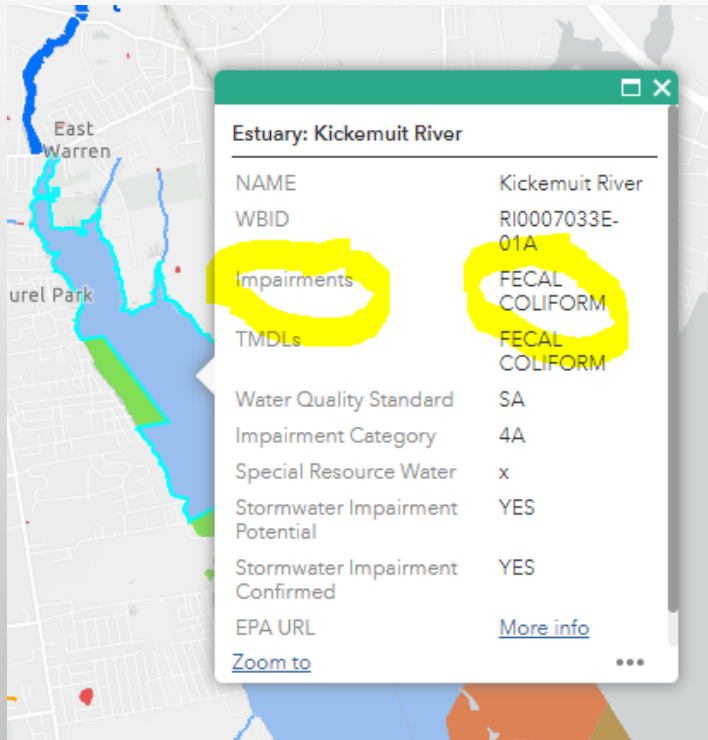
RIPDES 2024 MSGP ANNUAL EFFLUENT LIMITATIONS GUIDELINES (ELG) MONITORING PART VI.C.

IF discharge exceeds effluent limit,

THEN permittee must complete the following things:

- Conduct follow up monitoring for any pollutant(s) that exceeds the effluent limit within 30 calendar days of implementing corrective action(s)
- Submit an exceedance report (Section VI.C.1.)
- Continue monitoring, at least quarterly, until the discharge is in compliance with the effluent limit (Section VI.C.2.)

RIPDES 2024 MSGP IMPAIRED WATERS MONITORING WHAT DO I SAMPLE FOR?



- DEM's [Environmental Resource Map](#)
 - Permittees can turn on the 'Surface Water IWQMA Category (303d)' layer to see if their receiving water body is impaired, and if so, what it is impaired for
- **NeT-DMR**
 - If the NOI was filled out with accurate information, permittees can log into NeT-DMR and access their blank DMR form and find out what impairments to sample for

If the impairments listed on NeT-DMR are not consistent with DEM's Environmental Resource map, a change NOI may be required. Contact DEM for guidance

RIPDES 2024 MSGP IMPAIRED WATERS MONITORING

Water Body Impairments NOT Requiring Sampling	
Non-Native Aquatic Plants	Mercury in Water Column
Non- Native Fish, Shellfish, or Zooplankton	Fishes Bioassessments
Other flow regime alterations	Aquatic Macroinvertebrate Bioassessments
Dioxin in Fish Tissue	Benthic-Macroinvertebrate Bioassessments
Bacteriophage	Ambient Bioassays - Chronic Aquatic Toxicity
Mercury	Whole Effluent Toxicity (WET)
Dioxin (including 2,3,7,8-TCDD)	Taste and Odor
Polychlorinated biphenyls (PCBs)	Total Organic Carbon
PCB in Fish Tissue	Sediment Bioassay
Mercury in Fish Tissue	



RIPDES 2024 MSGP IMPAIRED WATERS MONITORING

Impairment Pollutants Requiring Sampling	Sampling Parameter/Surrogate	Impairment Pollutants Requiring Sampling	Sampling Parameter/Surrogate	Impairment Pollutants Requiring Sampling	Sampling Parameter/Surrogate
Aluminum, Total Aluminum	Total Aluminum	Thallium	Total Thallium	pH	pH
Antimony	Total Antimony	Vanadium	Total Vanadium	Temperature	Temperature, water deg. centigrade
Arsenic	Total Arsenic	Zinc	Total Zinc	Chemical Oxygen Demand	Chemical Oxygen Demand
Barium	Total Barium	Chloride	Total Chloride	Enterococcus	Enterococci
Beryllium	Total Beryllium	Total Ammonia	Total Ammonia nitrogen	Fecal Coliform	Fecal Coliform
Cadmium	Total Cadmium	Total Nitrogen	Total Nitrogen	Escherichia coli	E. coli
Cobalt	Total Cobalt	Nitrate + Nitrite	Total Nitrite + Nitrate	Chlorophyll-a	Total Nitrogen (Salt Water); Total Phosphorus (Fresh Water)
Copper	Total Copper	TKN	Total Nitrogen, Kjeldahl	Nutrient/Eutrophication Biological Indicators	Total Nitrogen (Salt Water); Total Phosphorus (Fresh Water)
Iron, Total Iron, Dissolved Iron	Total Iron	Total Phosphorus	Total Phosphorus	Aquatic Plants - Native	Total Nitrogen (Salt Water); Total Phosphorus (Fresh Water)
Lead	Total Lead	Ortho -P	Total Phosphorus	Excess Algal Growth	Total Nitrogen (Salt Water); Total Phosphorus (Fresh Water)
Nickel	Total Nickel	Specific Conductance	Specific conductance	Dissolved Oxygen	Total Nitrogen (Salt Water); Total Phosphorus (Fresh Water)
Sodium	Total Sodium	Total Dissolved Solids	Total Dissolved Solids	Aquatic Plants (Macrophytes)	Total Nitrogen (Salt Water); Total Phosphorus (Fresh Water)
Selenium	Total Selenium	Total Suspended Solids	Total Suspended Solids		
Silver	Total Silver	Turbidity	Total Suspended Solids		

RIPDES 2024 MSGP IMPAIRED WATERS MONITORING

PART VI.B.3.

- After 1 year of samples, if the impaired pollutant IS NOT DETECTED or is present due to “natural background” sources, the permittee may discontinue monitoring
 - After 1 year of samples, if the impaired pollutant IS DETECTED and is not due to “natural background” sources, the permittee must continue monitoring for the impairment for...
 - 1) The remainder of the permit term
- OR
- 2) Until the impairment pollutant is not detected for 2 consecutive monitoring periods (i.e., 1 year)

RIPDES 2024 MSGP IMPAIRED WATERS MONITORING ADDITIONAL REQUIREMENTS PART II.B.2.

IF a facility discharges to a waterbody impaired for *Aluminum, Lead, Cadmium, Zinc, Copper, Iron, Turbidity, Total Suspended Solids, Chloride, Dissolved Oxygen, Total Nitrogen, Total Phosphorous, and/or Total Organic Carbon*, **THEN** the permittee must implement the following source controls:

- Sweep impervious surface at least 1 x per quarter (increase frequency when necessary).
- Keep all exposed areas free of solid waste, and floatable debris.
- Implement other pollution prevention and stormwater BMPs as appropriate.

IF a facility discharges to a waterbody impaired for *bacteria/pathogens (Enterococcus or Fecal Coliform)*, **THEN** the permittee must implement the following source controls, in addition to the controls listed above:

- Deter rodents, birds, and other animals from feeding/nesting/roosting at the facility.
- Install structural source control BMPs to address on-site activities and sources that could cause bacterial/pathogen contamination (e.g., dumpsters, compost piles, food waste and animal products).
- Inspect catch basins and other stormwater BMPs 1 x per quarter and perform at least one dry weather inspection of the stormwater system to identify and eliminate sewer cross-connections.

RIPDES 2024 MSGP INDICATOR MONITORING

WHAT DO I SAMPLE FOR?

PART VI.B.4.

- Indicator = Monitor only
- Enterococcus & Copper applies to:
 - Sector P – Land Transportation and Warehousing, including transfer stations, if engaged in the temporary storage and/or transfer of solid waste that is exposed to stormwater (not including recyclables)
- Copper applies to:
 - Sector M – Automobile Salvage Yards
 - Sector Q – Water Transportation
 - Sector R – Ship and Boat Building and Repair Yards
 - Sector AA – Fabricated Metal Products



RIPDES 2024 MSGP INDICATOR MONITORING

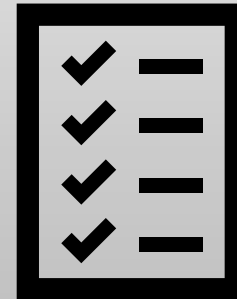
PART VI.B.4.

- After 1 year of samples, if the indicator pollutant IS NOT DETECTED or is present due to “natural background” sources, the permittee may discontinue monitoring
 - After 1 year of samples, if the indicator pollutant IS DETECTED and is not due to “natural background” sources, the permittee must continue monitoring for the indicator pollutant for...
 - 1) The remainder of the permit term
- OR
- 2) Until the indicator pollutant is not detected for 2 consecutive monitoring periods (i.e., 1 year)

RIPDES 2024 MSGP MONITORING DOCUMENTATION

PART VI.A.3.

- Documentation must be maintained on-site with the SWMP per Part VI of the permit
- For each monitoring event, the permittee must document:
 - Date and duration (in hours) of the rainfall event
 - Total rainfall (in inches)
 - Time (in days) since the previous measurable storm event
 - *Reminder: this must be at least 48 hours (2 days)*



The image features a light gray background with a subtle, circular, textured pattern in the center. The corners are decorated with several realistic water droplets of varying sizes, some overlapping. The text "10 MINUTE BREAK" is centered in a bold, black, sans-serif font.

10 MINUTE BREAK

RIPDES 2024 MSGP QUARTERLY VISUAL ASSESSMENTS

PART IV.B.

- Documentation must be maintained on-site with the SWMP per Part VI of the permit
- FREQUENCY: 2x January 1-June 30; 2x July 1-December 31
 - Typically completed at the same time as analytical monitoring to satisfy the monitoring documentation requirement
- The visual assessment of each stormwater discharge sample must be made in a clean, clear container
- What am I looking for?
 - Color
 - Odor
 - Clarity
 - Floating solids
 - Settled solids
 - Suspended solids
 - Foam
 - Oil sheen
 - Other obvious indicators of stormwater pollution



RIPDES 2024 MSGP

ROUTINE QUARTERLY INSPECTIONS

WHAT DO I LOOK FOR DURING THE INSPECTION?

PART IV.A.1.

- Industrial materials, residue or trash that may have or could come into contact with stormwater
- Leaks or spills from industrial equipment, drums, tanks and other containers
- Offsite tracking of industrial or waste materials, or sediment where vehicles enter or exit the site
- Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas
- Control measures needing replacement, maintenance or repair



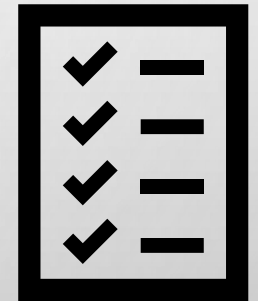
RIPDES 2024 MSGP

ROUTINE QUARTERLY INSPECTIONS

HOW DO I DOCUMENT THE INSPECTION?

PART IV.A.1.A.

- Documentation must be maintained on-site with the SWMP per Part VI of the permit
- The documentation of each routine facility inspection must include the following information at a minimum:
 - Date and time of inspection
 - Name and signature of inspector
 - Weather information
 - All observations relating to the implementation of control measures at the facility
 - Any incidents of noncompliance observed
 - Any additional control measures needed to comply with the permit requirements



RIPDES 2024 MSGP ROUTINE QUARTERLY INSPECTIONS RECORD KEEPING

- DEM has a record-keeping and reporting template for permittees available on the RIPDES MSGP website (www.dem.ri.gov/MSGP)

Stormwater Industrial Routine Facility Inspection Report

General Information			
Facility Name	Insert Name		
RIPDES Permit No.	Insert Permit No.		
Date of Inspection	Insert Date	Start/End Time	Insert Start/End Time
Inspector's Name(s)	Insert Name		
Inspector's Title(s)	Insert Title		
Inspector's Contact Information	Insert Contact Info		
Inspector's Qualifications	Insert qualifications or add reference to the SWMP		
Weather Information			
Weather at time of this inspection?			
<input type="checkbox"/> Clear <input type="checkbox"/> Cloudy <input type="checkbox"/> Rain <input type="checkbox"/> Sleet <input type="checkbox"/> Fog <input type="checkbox"/> Snow <input type="checkbox"/> High Winds <input type="checkbox"/> Other: _____ Temperature: _____			
Have any previously unidentified discharges of pollutants occurred since the last inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Describe			
Are there any discharges occurring at the time of inspection? <input type="checkbox"/> Yes <input type="checkbox"/> No If yes, describe: Describe			

Control Measures

- Number the structural stormwater control measures identified in your SWMP on your site map and list them below (add as many control measures as are implemented on-site). Carry a copy of the numbered site map with you during your inspections. This list will ensure that you are inspecting all required control measures at your facility.
- Describe corrective actions initiated, date completed, and note the person that completed the work in the Corrective Action Log.

	Structural Control Measure	Control Measure is Operating Effectively?	If No, In Need of Maintenance, Repair, or Replacement?	Corrective Action Needed and Date Corrected (identify needed maintenance and repairs, or any failed control measures that need replacement, list repairs/modifications made and date completed)
1	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions
2	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions
3	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions
4	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions
5	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions
6	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions
7	Insert Control Measure Name	<input type="checkbox"/> Yes <input type="checkbox"/> No	<input type="checkbox"/> Maintenance <input type="checkbox"/> Repair <input type="checkbox"/> Replacement	Describe Corrective Actions

MSGP Quarterly Visual Assessment Form

(Complete a separate form for each outfall you assess)

RIPDES PERMIT No. _____

Name of Facility: _____

Outfall Name: Name _____ "Substantially Identical Outfall"? No Yes (identify substantially identical outfalls): _____

Person(s)/Title(s) collecting sample: Name/Title _____

Person(s)/Title(s) examining sample: Name/Title _____

Date & Time Discharge Began: _____ Date & Time Sample Collected: _____ Date & Time Sample Examined: _____
Enter date and time Enter date and time Enter date and time

Substitute Sample? No Yes (identify quarter/year when sample was originally scheduled to be collected): _____

Nature of Discharge: Rainfall Snowmelt

If rainfall: Rainfall Amount: No of _____ Previous Storm Ended > 72 hours Yes No* (explain): _____
inches inches Before Start of This Storm?

Parameter _____

Color None Other (describe): _____

Odor None Musty Sewage Sulfur Sour Petroleum/Gas _____
 Solvents Other (describe): _____

Clarity Clear Slightly Cloudy Cloudy Opaque Other _____

Floating Solids No Yes (describe): _____

Settled Solids** No Yes (describe): _____

Suspended Solids No Yes (describe): _____

Foam (gently shake sample) No Yes (describe): _____

Oil None Flecks Globs Sheen Slick
 Sheen Other (describe): _____

Other Obvious Indicators of Stormwater Pollution No Yes (describe): _____

* The 72-hour interval can be waived when the previous storm did not yield a measurable discharge or if you are able to document (attach applicable documentation) that less than a 72-hour interval is representative of local storm events during the sampling period.

** Observe for settled solids after allowing the sample to sit for approximately one-half hour.

Detail any concerns, additional comments, descriptions of pictures taken, and any corrective actions taken below (attach additional sheets as necessary). [Insert details](#)

Certification by Facility Responsible Official (Refer to MSGP Part X for Signatory Requirements)

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

A. Name: _____ B. Title: _____

C. Signature: _____ D. Date Signed: _____



RIPDES 2024 MSGP MONITORING REQUIREMENTS INACTIVE AND UNSTAFFED SITE EXCEPTIONS *PART VI.B.1.F.*

- Impaired Waters, Indicator, and Effluent Limitations Guidelines Monitoring are all **STILL REQUIRED** if a facility is inactive or unstaffed.
- Benchmark Monitoring **DOES NOT APPLY** if a facility is inactive or unstaffed.
 - To invoke exception the permittee must:
 - Indicate on NOI that facility is inactive and unstaffed via a change NOI in NeT-MSGP
 - Submit a signed statement to the DEM that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to stormwater
 - Maintain this signed statement onsite with the SWMP

RIPDES 2024 MSGP

INSPECTION REQUIREMENTS

INACTIVE AND UNSTAFFED SITE EXCEPTIONS

PARTS IV.A.2. & IV.B.3.

Routine Facility Inspections & Quarterly Visual Assessment Procedures

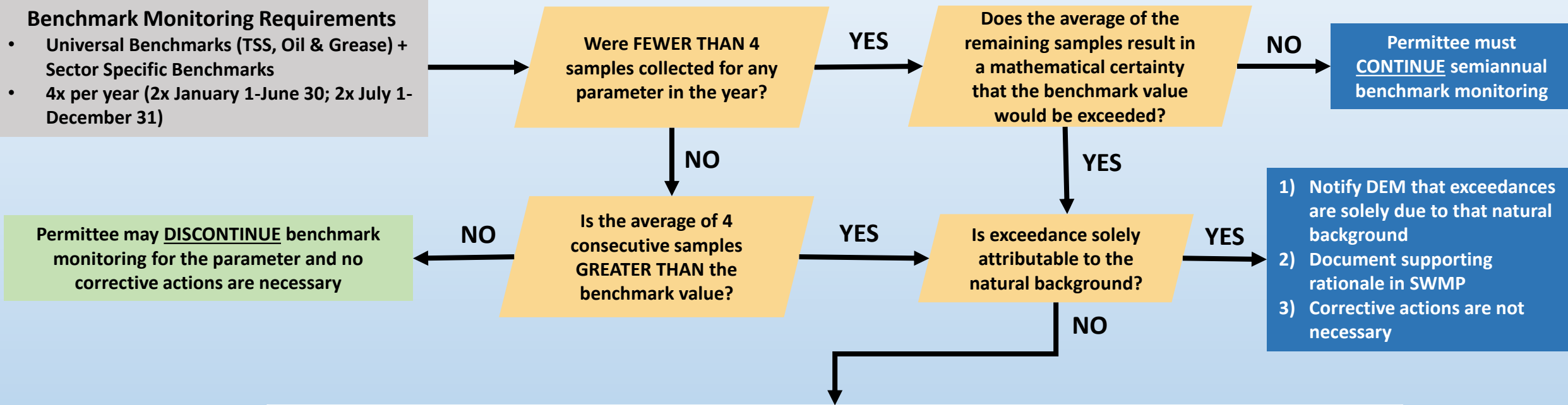
- Does not apply to a facility that is inactive and unstaffed, if there is no industrial materials or activities exposed to stormwater
 - To invoke exception:
 - Indicate on NOI that facility is inactive and unstaffed via a change NOI in NeT-MSGP
 - Submit a signed statement to the DEM that the site is inactive and unstaffed, and that there are no industrial materials or activities exposed to stormwater
 - Maintain this statement onsite with the SWMP

2024 MSGP Flowchart

Benchmark Exceedances & Corrective Actions

Benchmark Monitoring Requirements

- Universal Benchmarks (TSS, Oil & Grease) + Sector Specific Benchmarks
- 4x per year (2x January 1-June 30; 2x July 1-December 31)



Corrective Actions (CA)

Level 1: Operational Source Control BMPs

- Continue benchmark monitoring 4x/year
- Submit summary of CAs for each benchmark exceedance with annual report

Level 2: Structural Source Control BMPs

- Continue benchmark monitoring 4x/year
- Submit summary of CAs for each benchmark exceedance with annual report

Level 3: Treatment BMPs

- Continue benchmark monitoring 4x/year
- CA Report required (submission with the Annual Report) – includes either non-industrial pollutant source demonstration OR engineering report for treatment BMPs for DEM approval
- Submit summary of CAs for each benchmark exceedance with annual report

2024 MSGP Flowchart

Tiered Corrective Actions

Corrective Actions (CAs)

Level 1: Operational Source Control BMPs

Deadlines

- CAs must be implemented within 14 calendar days following benchmark exceedance

Examples

- Increase sweeping
- Employee training
- Store residues away from drainage pathways
- Limit storage times of residues to prevent degradation and leachate
- Increase frequency of inspections

Level 2: Structural Source Control BMPs

Deadlines

- CAs must be implemented within 6 months following level 2 benchmark monitoring year (extension can be requested)

Examples

- Modify processes, storage or handling
- Use recirculating wash systems
- Use roofs, canopies, sheds to cover piles
- Pave spill prone areas to facilitate cleaning
- Elevate storage areas and divert runoff
- Build secondary containment

Level 3: Treatment BMPs

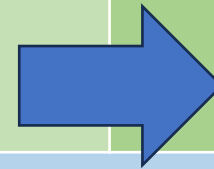
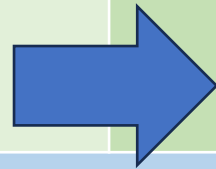
may require DEM/local authority approval

Deadlines

- CAs must be implemented within 6 months following level 3 benchmark monitoring year (extension can be requested)

Examples

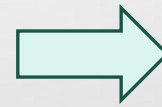
- Implement vegetative buffer strips to capture sediment particles
- Construction of wet vegetated treatment systems – bioretention with underdrain
- Installation of filtering media



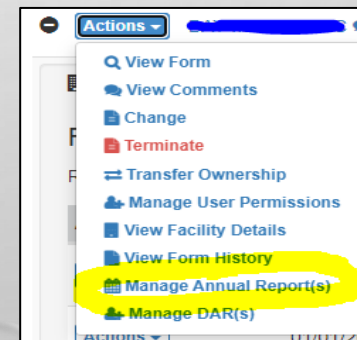
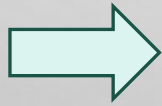
** Where the CAs result in changes to any of the controls or procedures documented in the SWMP, the permittee must modify the SWMP accordingly within 30 calendar days of completing CA work.**

RIPDES 2024 MSGP ELECTRONIC REPORTING NET-DMR & NET-MSGP DEADLINES

NeT-DMR	NeT-MSGP
<ul style="list-style-type: none"> Discharge Monitoring Reports (DMRs) due January 15 and July 15 following the monitoring period 	<ul style="list-style-type: none"> Annual Reports (ARs) due yearly on January 30 for the previous monitoring year



Code	Parameter Name	NODI List	Quantity or Loading		
			Value 1	Value 2	Units
00310	BOD, 5-day, 20 deg. C	Smpl.	=	=	lb/d
1 - Effluent Gross					
Season: 0		Req.	<= 948 Monthly Average	<= 1580 Daily Maximum	Pounds per Day
NODI: [v]		NODI	[v]	[v]	





RIPDES 2024 MSGP ELECTRONIC REPORTING COMMON NET-DMR SUBMISSION ERRORS



Reporting the average of the collected monitoring results

- ➔ Correction: Permittees must report the two collected samples as minimum and maximum values, not an average.

Reporting less than (<) values

- ➔ Correction: If a sample result is “less than detect”, the permittee should report a zero on the DMR and include the detection limit for the parameter(s) and an explanation (if any) as to why the value was “less than detect” in the DMR cover letter.

Missing Data/Incorrect use of NODI codes

- ➔ Correction: Permittees should not leave a box that requires data empty or blank. If missing data, permittee must enter the appropriate No Data Indicator (NODI) code and include an explanation of why the data is not available in the DMR cover letter.

<u>NODI Code</u>	<u>Description</u>
“NODI = 2”	- Operation Shutdown
“NODI = A”	- General Permit Exemption (i.e. – met benchmarks)
“NODI = 9”	- Conditional Monitoring - Not Required this Period
“NODI = C”	- No Discharge
“NODI = E”	- Failed to Sample/Required Analysis Not Conducted
“NODI = P”	- Laboratory Error or Invalid Test
“NODI = N”	- Not Constructed (only to be used if the facility/process from which the discharge occurs has not been constructed, so that there is no discharge)
“NODI = T”	- Environmental Conditions – Monitoring not Possible



RIPDES 2024 MSGP ELECTRONIC REPORTING NET-DMR GUIDANCE



Rhode Island Department of Environmental Management

**2023
Rhode Island Pollutant Discharge Elimination System (RIPDES)
Discharge Monitoring Report (DMR)
Instructions**

**Rhode Island Department of Environmental Management
RIPDES Program
235 Promenade Street
Providence, RI 02908**

Revised April 4, 2023

- [RIPDES Discharge Monitoring Report \(DMR\) Instructions](#) are available on the RIDEM [RIPDES webpage](#)

Additional Resources

- [Regulations for the Rhode Island Pollutant Discharge Elimination System \(RIPDES\) 250-RICR- 150-10-1](#)
- [RIPDES Application Forms](#)
- [Rules and Regulations Governing the Establishment of Various Fees \(250-RICR-30-00-1\)](#)
- [Rules Related to Electronic Document Submissions \(250-RICR-30-00-2\)](#)
- [Listing of RIPDES Individual permits, General Permits, and Terminations](#)

 [RIPDES 7Q10 policy](#) PDF file, less than 1mb 

 [RIPDES DMR Instructions](#) PDF file, less than 1mb 

 [RIPDES Individual Permit General Requirements](#) PDF file, less than 1mb 

 [Fee Form for New Dischargers](#) PDF file, less than 1mb 



RIPDES 2024 MSGP ADDITIONAL INFORMATION

- The [EPA Permit Search Tool](#) can be used by the public to search for permit records and related submissions for NPDES general permits.

Permit Search

Program (required)	Program Area (required)	Issuer (required) ¹
<input type="text" value="NPDES"/>	<input type="text"/>	<input type="text"/>
Coverage Type ¹		
<input type="text"/>		
Action Type ¹	Action Status ¹	
<input type="text"/>	<input type="text"/>	
NPDES ID	Coverage Status ¹	
<input type="text"/>	<input type="text"/>	
Regulated Entity Name ¹		
<input type="text"/>		
Show more...		
<input type="button" value="Reset"/>	<input type="button" value="Search"/>	

RIPDES 2024 MSGP IMPORTANT REMINDERS

- Permit effective September 1, 2024; Renewal NOI submissions were due **November 30, 2024**
- 2024 Annual Report Submission due **January 30, 2025**
- Analytical monitoring: Between July 1-December 31, 2024, analytical monitoring was **NOT** required
 - Exception: Effluent Limitations Guidelines (ELG) monitoring was required in 2024, and results must be reported with the 2024 Annual Report submission. This only applies to 2024 reporting year due to limitations caused by the permit reissuance process. ELG data via DMR submissions will be required after January 1, 2025.
 - All other permit requirements were in effect, including:
 - Quarterly Inspections
 - Quarterly Visual Assessments
 - Corrective Action Reports (as applicable)
- Analytical monitoring will be required for all permittees beginning January 1, 2025
- MSGP Annual Fee due **July 15, 2025**
 - Permittees will receive an invoice from NeT with payment instructions around May 15, 2025

QUESTIONS?

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