

Industrial General Permit Amendment Total Maximum Daily Load Compliance Options

Stakeholder Meeting



Conceptual Draft Compliance Options

Option 1

- On-site TMDL Compliance

Option 2

- Watershed Based TMDL Compliance

Option 1: On-site TMDL Compliance

- BMP implementation for capture and use, infiltration, and/or evapotranspiration of storm water associated with industrial activities and authorized non-storm water discharges to comply with TMDL requirements
- BMP design:
 - Continuously maintain runoff produced up to and during the 85th percentile 24-hour precipitation event

Option 1: On-site TMDL Compliance

Issues with Option 1 compliance:

1. Liability of bypass monitoring
2. Issue #2
3. Issue #3

Option 2: Watershed Based TMDL Compliance

- Discharges that meet one or more of the following criteria are eligible to enter into agreement with the local municipality for compliance with the TMDL using watershed-based BMPs
 - Facility is located within a watershed that has a municipal watershed management programs
 - Municipality agrees for the facility to be a part of the watershed-based BMP

Option 2: Watershed Based TMDL Compliance

Issues with Option 2 compliance:

1. Discharger's compliance point is outside of facility boundary (conflict with IGP point of compliance requirements)
2. How to legally enter into agreement with a local municipality
3. Issue #3

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