

COR900000

Stormwater Discharges Associated with Non-Extractive Industrial Activity (Sector D)

CDPHE Water Quality Control Division
October 15, 2025

Agenda

- Compliance with the permit
- Important changes
 - Benchmarks/AIM
 - Discharge Preparation Plans
 - Other Notable changes
- Questions?



A scenic landscape photograph of a mountain range with snow-covered peaks and evergreen trees. The scene is reflected in a calm body of water in the foreground. A semi-transparent white horizontal band is overlaid across the middle of the image, containing the word "Compliance" in a large, bold, black sans-serif font.

Compliance

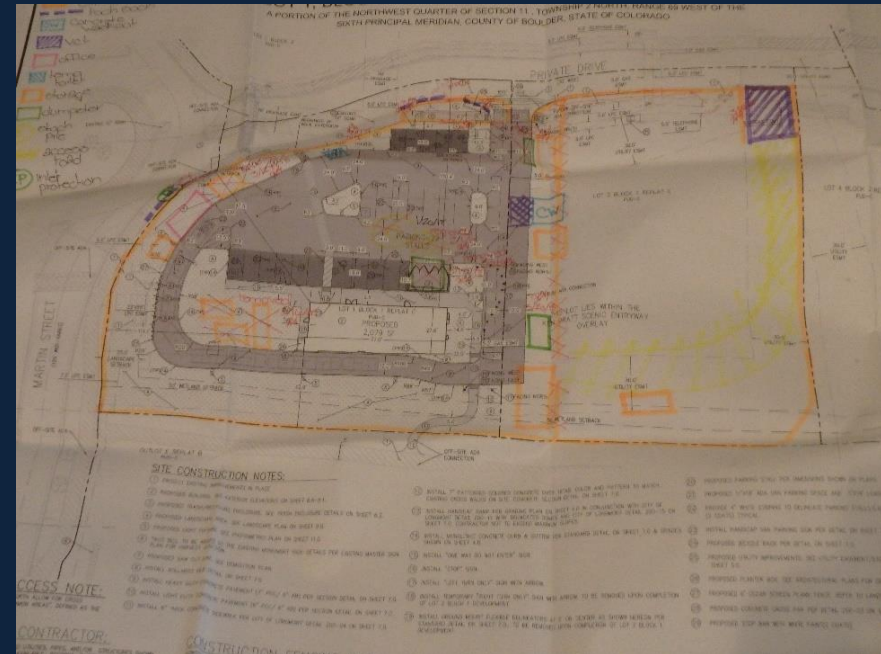
Compliance with the Permit

- Develop and implement a stormwater management plan (SWMP) (Part I.F.)
- Routine facility inspections (Part I.G.)
- Site monitoring and sampling
- Record keeping/DMRs
- Corrective actions or Additional Implementation Measures (AIM)



Common SWMP Compliance Issues

- Site map not up to date
- Control measure specifications not included
- Lack of thorough corrective action documentation
- Missing sample results
- Missing practice-based schedules and procedures (i.e. good housekeeping, spill prevention, maintenance, and training)



Routine Facility Inspection Compliance

- Quarterly requirement at a minimum
- At least one inspection conducted per year during a run-off event
- Performed by Qualified Personnel



Inspection Compliance

Identify Pollutant Source(s)

Evaluate Control Measure(s)

Observe Discharge Point(s)

Identify Pollutant Sources



Evaluate Control Measures



Observe Discharge Point(s)



Common Inspection Findings

- Trash and spills
- No control measures implemented for pollutant sources
- Outfalls identified do not match the permit certification or have been omitted all together



Site Monitoring and Sampling Compliance (Sector D)

- Visual Assessment

- Color
- Odor
- Clarity
- Floating Solids
- Settled Solids
- Suspended Solids
- Foam
- Oil Sheen
- Other obvious indicators

- Benchmark Monitoring

D-1 (paving and roofing materials) TSS @ 100 mg/L

D-2 (emulsion facilities) TSS @ 23 mg/L (daily max), 15 mg/L (30 day average); pH 6 – 9; Oil and Grease 15 mg/L (daily max), 10 mg/L (30 day average)

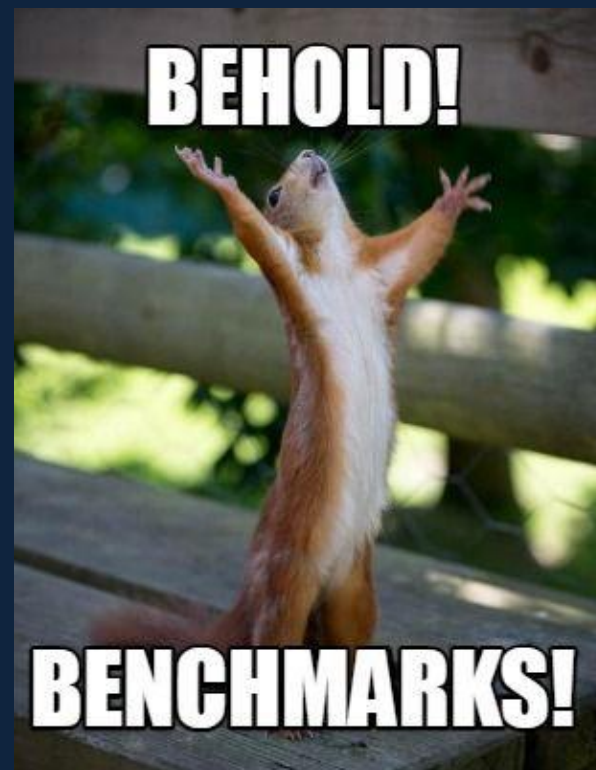


A scenic landscape photograph of a mountain range with snow-covered peaks and evergreen trees. The scene is reflected in a calm lake in the foreground. A semi-transparent white banner is overlaid across the middle of the image, containing the title text.

Benchmark/AIM Changes

Benchmark Changes

- Dissolved form: cadmium and lead
- More stringent: pH (new to E2), silver, selenium
- Other
 - Cyanide: changed from total to free
 - Magnesium: removed



Additional Implementation Measures (AIM)

Level 1 = single sample result > benchmark

- Take immediate simple steps

Level 2 = rolling 4-sample quarterly average > benchmark

- Review the selection, design, installation, and implementation of control measures to determine appropriate modifications necessary to attain practice-based limits and meet benchmark concentrations

Level 3 = after Level 2, rolling 4-sample quarterly averages > benchmark

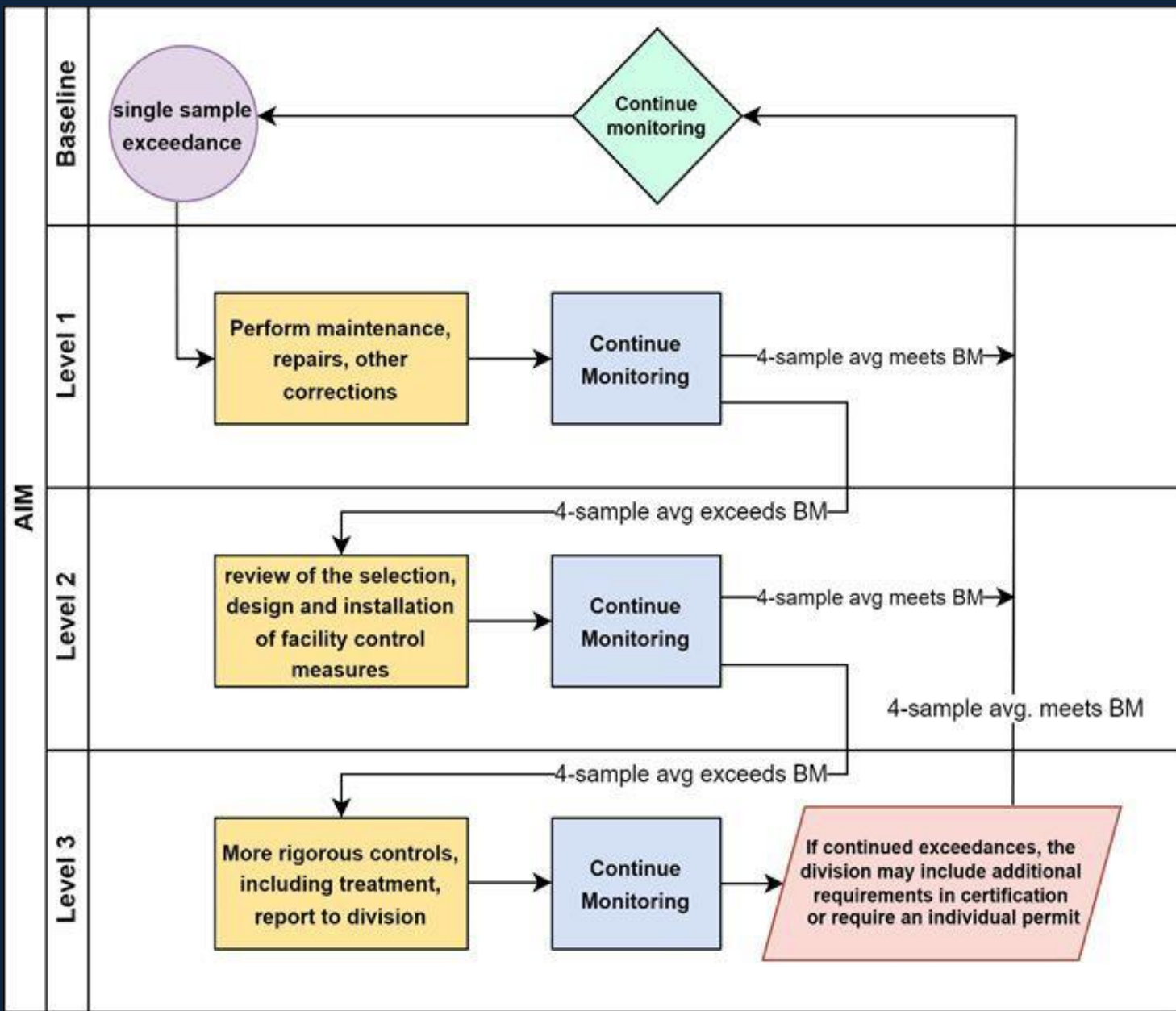
- Install permanent controls or treatment

Additional Implementation Measures (AIM)

- "AIM tool for COR900000"

<https://cdphe.colorado.gov/wq-commerce-and-industry-compliance-assistance-and-guidance>

- The Level 3 status appears in DMRs as “are you in compliance”. This parameter is to be interpreted as “are you in Level 3”. A level 3 status is not non-compliance and answering “FAIL” will not be deemed non-compliance.
- See swim diagram in Appendix E of Permit



Discharge Preparation Plans

Discharge Preparation Plans

For permittees that are required to submit DMRs (Sector D), if there were no measurable storm events during the first four quarters in which sampling is required by this permit, then the permittee must prepare a Discharge Preparation Plan to determine conditions that are likely to produce a measurable storm event.

- 1) Estimation of rainfall in inches that may result in a discharge event
- 2) Assessment of snowmelt conditions that may result in a discharge event,
- 3) Procedures to track precipitation conditions above
- 4) Methods and procedures for collecting samples, including procedures for collecting samples outside of regular business hours.
- 5) The plan must be reported to the division in the annual report due for that reporting period.



Other Notable Changes

Numeric WQBEL Clarification

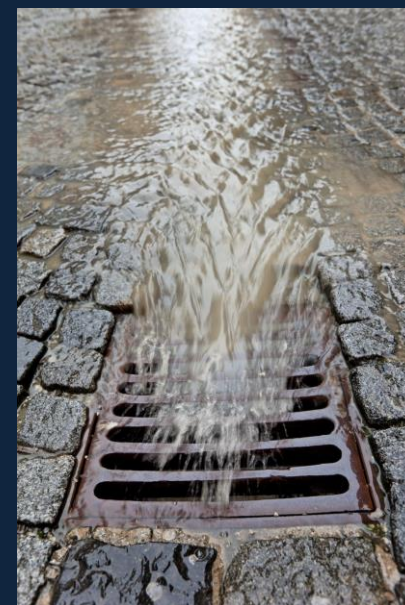


- Not a new requirement
- Added details on how they would be applied
- Only after Level 3 and division modifies cert to include non-numeric requirements.

Notifying MS4s

If discharge is to an MS4, the permittee must provide the MS4 copies of

- Permit application
- Notifications of certain harmful discharges (Part I.J.1.a)
- Notifications to old and new MS4s when mobile concrete or asphalt plants relocate. Provide certification to new MS4.



Other notable changes

- Watershed Protection Control Regulations may result in phosphorus monitoring at some facilities with high phosphorus materials.
- Grab sample window increased from 30 min to 2 hours
- Composite samples allowed for some parameters, 3 per hour during first 3 hrs of discharge



Resources

Permitting

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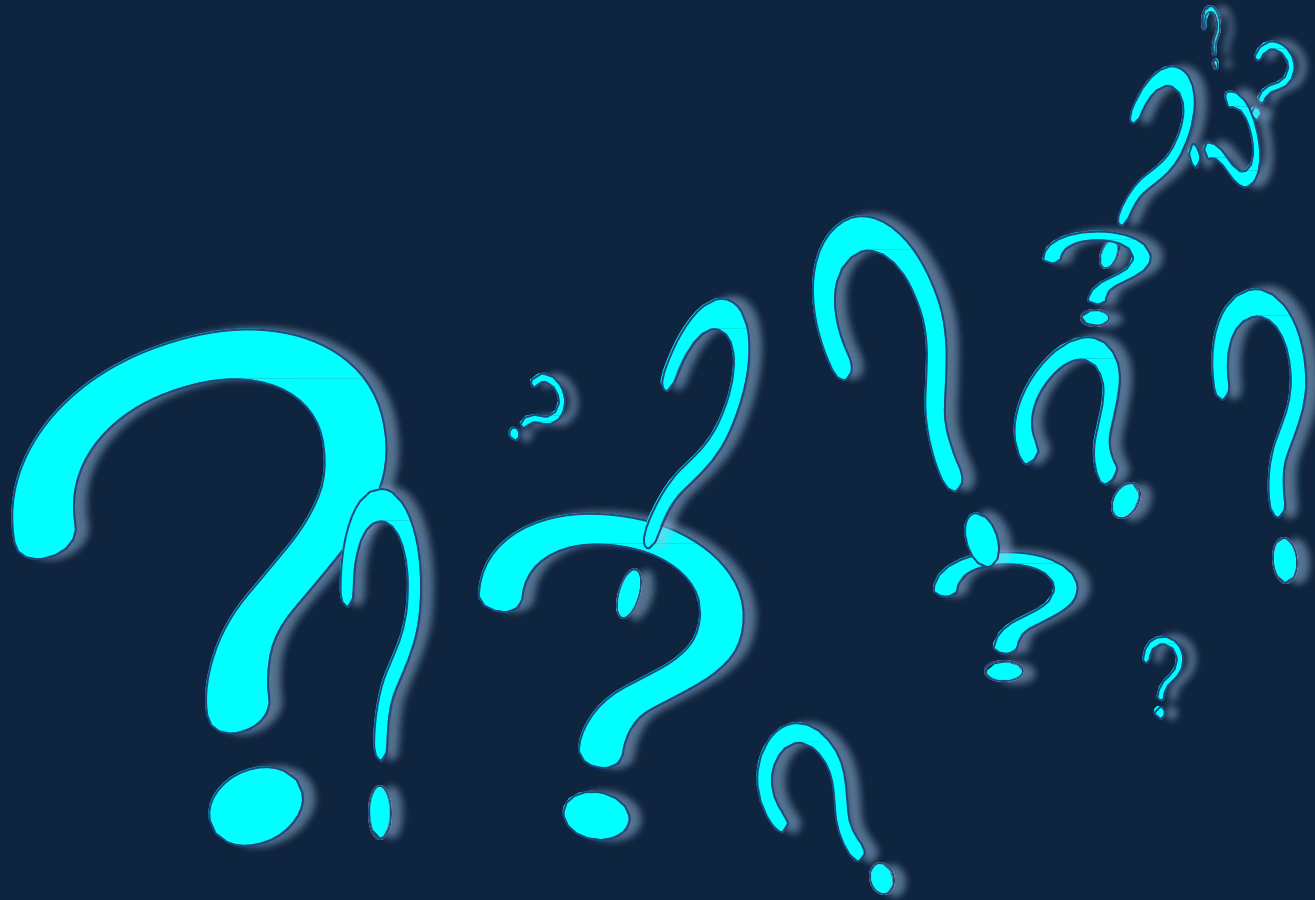
Non-Extractive Industrial Stormwater General Permit Webpage:

<https://cdphe.colorado.gov/renewal-industrial-stormwater-general-permit>

Guidance for Industrial Stormwater:

<https://cdphe.colorado.gov/wq-commerce-and-industry-compliance-assistance-and-guidance>

QUESTIONS





THANK YOU!