EPA 2026 MULTI-SECTOR GENERAL PERMIT

Elizabeth Gugliotti, P.E., TURP

Senior Project Engineer

Pennoni Associates, Inc.

egugliotti@pennoni.com

508-318-6094

MSGP Overview

- Multi-Sector General Permit regulates industrial stormwater discharges to Waters of the United States

Sector A – Timber Products	Sector B – Paper Products	Sector C – Chemical Products
Sector D – Asphalt Paving and Roofing Materials and Lubricant	Sector E – Glass, Clay, Cement, Concrete, and Gypsum Products	Sector F – Primary Metals
Sector G – Metal Mining	Sector H – Coal Mining	Sector I – Oil and Gas Extraction
Sector J – Mineral Mining and Dressing	Sector K – Hazardous Waste Treatment Storage or Disposal	Sector L – Landfills and Land Application Sites
Sector M – Auto Salvage Yards	Sector N – Scrap Recycling	Sector O – Steam Electric Generating
Sector P – Land Transportation	Sector Q – Water Transportation	Sector R – Ship and Boat Building or Repairing Yards
Sector S – Air Transportation	Sector T – Treatment Works	Sector U – Food and Kindred Products
Sector V – Textile Mills, Apparel, and other Fabric Products	Sector W – Furniture and Fixtures	Sector X – Printing and Publishing
Sector Y – Rubber and Plastic Products	Sector Z – Leather Tanning and Finishing	Sector AA – Fabricated Metal Products
Sector AB – Transportation Equipment or Machinery	Sector AC – Electronic, Electrical, Photographic and Optical Goods	Sector AD – Other

MSGP Overview

- Discharges currently covered by 2021 MSGP which expires February 28, 2026
- Permittees required to maintain Stormwater Pollution Prevention Plan, implement control measures, and meet inspection and monitoring requirements
- Proposed 2026 MSGP would replace 2021 MSGP when it expires
- EPA accepting comments on the 2026 MSGP until **February 11, 2025**

Overview of 2026 MSGP Changes

- Control Measure Enhancements for Major Storm Events
- Water-Quality Based Effluent Limitations
- Monitoring Changes
  - New Indicator Monitoring for PFAS
  - New Benchmark Monitoring for Certain Sectors
  - Changes to Benchmark Monitoring and Impaired Waters Monitoring Schedules
- Additional Implementation Measures Changes
  - Level 1 Triggering Event for Impaired Waters Detection
  - Inspection Requirement for Level 1 Triggering Events
  - Reporting for Triggering Events and Claiming Exceptions

Preparing for Major Storm Events

- Expanded emphasis on existing permit requirement
- Consider whether your facility has experienced major storm events or might in the future
  - Hurricanes
  - Floods
  - Heavy snow
- Choose adaptive measures to minimize impacts
  - Flood barriers
  - Relocating materials or equipment to higher ground
  - Securing equipment against floating
  - Emergency planning and training

Water Quality Based Effluent Limitations

- New specific requirement for all sectors

Your discharge *must not contain or result in*:

- Observed deposits of floating, settled, or suspended solids, scum, sheen, or substances;
- An observable film or sheen upon or discoloration from oil and grease;
- An observable foam; or
- Substances that produce an observable change in color or odor.

PFAS Monitoring

- Would be required for all sectors *except*:

Sector E – Glass, Clay, Cement, Concrete, and Gypsum Products	Sector G – Metal Mining	Sector H – Coal Mining
Sector J – Mineral Mining and Dressing	Sector O – Steam Electric Generating	Sector Q – Water Transportation

- Indicator monitoring (report-only)
- 40 PFAS compounds listed in EPA Method 1633
- Quarterly throughout permit term

Benchmark Monitoring Changes

- New benchmark monitoring for some sectors
- Changes from indicator to benchmark monitoring

	E3	I1	L2	N2	O1	P1	R1	U3	Y2	AB1	AD1
pH	√	√	√	√	√	√	√	√	√	√	√
TSS	√	√	√	√	√	√	√	√	√	√	√
COD			√	√		√		√		√	√
Ammonia		√									
Nitrate / Nitrite		√									
Metals		√	√	√	√	√	√			√	

- Monitoring required quarterly for first 3 years of permit; can stop after that if AIM not triggered

Additional Implementation Measures

- Triggered by stormwater samples that exceed benchmarks over 4-quarter average
- May happen sooner than 4 quarters!
- AIM Level 1: first exceedance
  - *New*: Conduct and document an inspection to investigate cause
  - Review SWPPP / stormwater control measures
  - Implement “any additional measures you identified as necessary”
- AIM Level 2: second exceedance
  - Review SWPPP
  - Implement additional pollution prevention / good housekeeping beyond what you did in Level 1
  - Must be reasonably expected to bring exceedance below benchmark

Additional Implementation Measures

- AIM Level 3: third exceedance
  - Install structural source controls or treatment controls
    - Permanent cover
    - Berms or secondary containment
    - Sand filters
    - Oil-water separators
    - Retention ponds or infiltration structures
  - Must have removal efficiency sufficient to bring exceedance below benchmark
- All AIM levels
  - *New*: Submit AIM Trigger Event Report
  - Keep monitoring until 4-quarter average drops below benchmark

AIM Exceptions

- *New*: EPA approval would be required to claim one of the available exceptions from AIM applicability
  - Natural background
  - Exceedance due to run-on from adjacent site
  - Abnormal event
  - Site-specific demonstration for aluminum and copper exceedances
  - Not exceeding water quality standards in receiving water

Impaired Waters Monitoring Changes

- Would be required for discharging to impaired waters with or without an approved TMDL
- Frequency would increase to quarterly for duration of permit term
- Detection of impaired waters parameter would trigger an Additional Implementation Measure response (Level 1 only)

Preparing for Proposed MSGP

- Proposed permit is open for public comment until **February 11**
  - https://www.regulations.gov/docket/EPA-HQ-OW-2024-0481
- Don’t wait to prepare for potential major storm events
- Review existing data for new benchmark parameters
- Start gathering data set if you might want to claim an AIM exception
  - Natural background data for pH
  - Receiving water quality data