



ACORN
ENVIROCOMPLY

**Stormwater Training and
Consultant Firm**

we train, support and
guide stormwater and
environmental professionals



ACORN ENVIROCOMPLY

CONFIDENT IN OUR WORK

At Acorn EnviroComply, we view our role as **risk analysts**—empowering professionals to see their work in stormwater management as a vital safety net for their organization and the surrounding community.

Specializing in industrial, MS4, and construction stormwater, **our mission is to guide companies through the complexities of regulatory compliance while helping them develop effective SWPPPs and sustainable stormwater practices.**

We're not just helping you meet requirements; we're helping you protect water quality, reduce liability, and safeguard your company's reputation while building a lasting positive impact on your local community.



Inside the MSGP

How industrial sectors shape stormwater compliance

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The 2021 EPA MSGP expired on February 28, 2026.

- The 2021 federal industrial permit (MSGP) expired February 28, 2026.
- EPA did not finalize the 2026 replacement in time.
- Existing permittees were administratively continued under the 2021 permit.
- New facilities in EPA-authority areas couldn't file an NOI, so EPA issued a No Action Assurance to bridge the gap.
- The coming 2026 permit is also set to add first-time PFAS monitoring.



Session Roadmap

Part 1: Read your sector

How a facility is classified, why that classification is the master key, and where the tricky cases hide.

Part 2: Trace The Obligations

How your sector drives monitoring, control measures, inspections and what happens when a result comes back high.

Part 3: Act in the 2026 Gap

What the expiration and the pending 2026 proposal mean for your facility between now and reissuance.

Part 4: A Request



POLL

Your sector or the Primary sector in your area?

Drop your answers in the chat.





MSGP Overview

- **Stormwater & Industrial Activities**
 - Outdoor activities like material handling, storage, maintenance, and cleaning are exposed to rain and snow.
 - Runoff can pick up pollutants and carry them directly to waterbodies or through storm sewers, harming water quality.
- **Regulatory Requirements**
 - 40 CFR 122.26(b)(14)(i–xi): Certain industrial stormwater discharges must be covered by NPDES permits.
 - Covers 11 specific industries





GENERAL

Provides the minimal requirements for pollution prevention, monitoring and standard operating procedures

- ND, NEC, NOI
- Location Requirements
- Associated Regulations

SECTOR

Outlines the mandates that are specific to the industry.

Failure to include Sector mandates is a common deficiency found by enforcement agencies.

- 30 Sectors
- Associated with specific SIC Codes

THE MAP

Sec	Industrial Activity
A	Timber Products
B	Paper & Allied Products
C	Chemical & Allied Products, Refining
D	Asphalt Paving, Roofing & Lubricants
E	Glass, Clay, Cement, Concrete, Gypsum
F	Primary Metals
G	Metal Mining (Ore)
H	Coal Mines & Coal Mining Facilities
I	Oil & Gas Extraction
J	Mineral Mining & Processing
K	Hazardous Waste TSD Facilities
L	Landfills & Land Application Sites
M	Automobile Salvage Yards
N	Scrap & Waste Recycling
O	Steam Electric Generating

Sec	Industrial Activity
P	Land Transportation & Warehousing
Q	Water Transportation
R	Ship & Boat Building / Repair
S	Air Transportation
T	Treatment Works
U	Food & Kindred Products
V	Textile Mills & Fabric Products
W	Furniture & Fixtures
X	Printing & Publishing
Y	Rubber, Plastics & Misc. Manufacturing
Z	Leather Tanning & Finishing
AA	Fabricated Metal Products
AB	Transportation Equip. & Machinery
AC	Electronic & Electrical Equipment
AD	Non-Classified (Director-assigned)

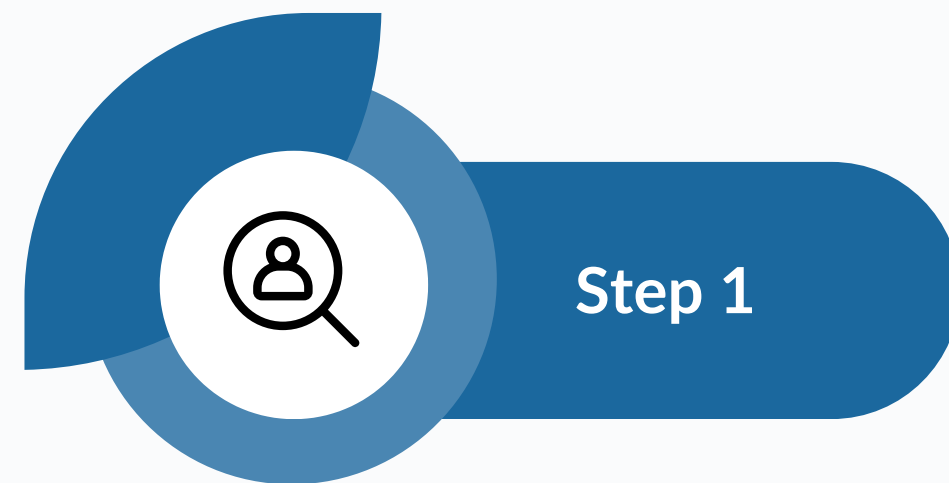


General vs Sector Examples



Requirement	General Requirements	Example of Sector-Specific Adjustments
Covered Discharges	Applies to stormwater discharges associated with industrial activity under the MSGP.	Sector E (Glass, Cement, Concrete, and Gypsum Products) regulates runoff from material stockpiles.
Eligibility for Permit Coverage	Facilities must engage in industrial activities covered by the permit and be located in an area where the EPA is the permitting authority.	Sector P (Land Transportation & Warehousing) limits eligibility for facilities handling bulk petroleum storage.
Limitations on Coverage	Prohibits discharges already covered under another NPDES permit or those mixed with unauthorized non-stormwater.	Sector A (Timber Products) disallows runoff from areas exposed to chemical wood treatments
Authorized Stormwater Discharges	Allows stormwater discharges from industrial activities if they meet effluent limits.	Sector N (Scrap & Waste Recycling) prohibits exposure of scrap metal to stormwater.
Technology-Based Effluent Limits	Requires best management practices (BMPs) to reduce pollutants, such as containment structures and sediment basins.	Sector S (Air Transportation) enforces stringent deicing fluid containment
SWPPP Requirements	All facilities must develop and maintain a Stormwater Pollution Prevention Plan (SWPPP) outlining control measures, inspections, and recordkeeping.	Sector F (Primary Metals) must document measures to prevent metal particulate accumulation.
Water Quality Based Requirements	Discharges cannot exceed state or federal water quality standards.	Sector M (Automobile Salvage Yards) requires stormwater treatment to remove heavy metals.
Inspection Requirements	Routine site inspections and quarterly visual assessments are required to ensure compliance.	Sector P (Transportation & Warehousing) increases scrutiny on fueling stations.
Monitoring & Reporting Requirements	Facilities must conduct monitoring for specific pollutants, submit reports, and comply with benchmark levels.	Sector J (Non-Metallic Mineral Mining) must measure pH fluctuations in stormwater.
Termination of Permit	Facilities may end permit coverage once industrial activity ceases, stormwater discharges are eliminated, and the site is stabilized.	Sector H (Coal Mining) requires complete site reclamation before termination

Finding Your Sector



Start with the activity

Your sector follows what your facility does, specifically the industrial activity on site, not the building or the company name.



Match the code

Appendix D lists each sector by SIC code, with NAICS conversions. **Your primary activity sets your primary sector.**



Go to your subpart

That letter points you straight to your **subpart of Part 8** and the sector specific requirements your site must comply with.





Enforcement and Compliance History Online

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Search Options



Analyze Trends



Find EPA Cases



Data Services

Quick Search

Search By

Location

Facility Name/ID

Enter city, state, and/or zip code

Search

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Use EPA's Enforcement and Compliance History Online website to search for facilities in your community to assess their compliance with environmental regulations. You can use ECHO to:

• Search for Facilities

The Sector Predicts The Risk



What stormwater touches



Material Storage

Raw materials, product, and by-products held outdoors.



Loading & Unloading

Transfer points where spills and drips concentrate.



Waste & Scrap Handling

Piles, dumpsters, and salvage exposed to rain.



Vehicle & Equipment Areas

Fueling, maintenance, and washdown zones.



Exposed Process Areas

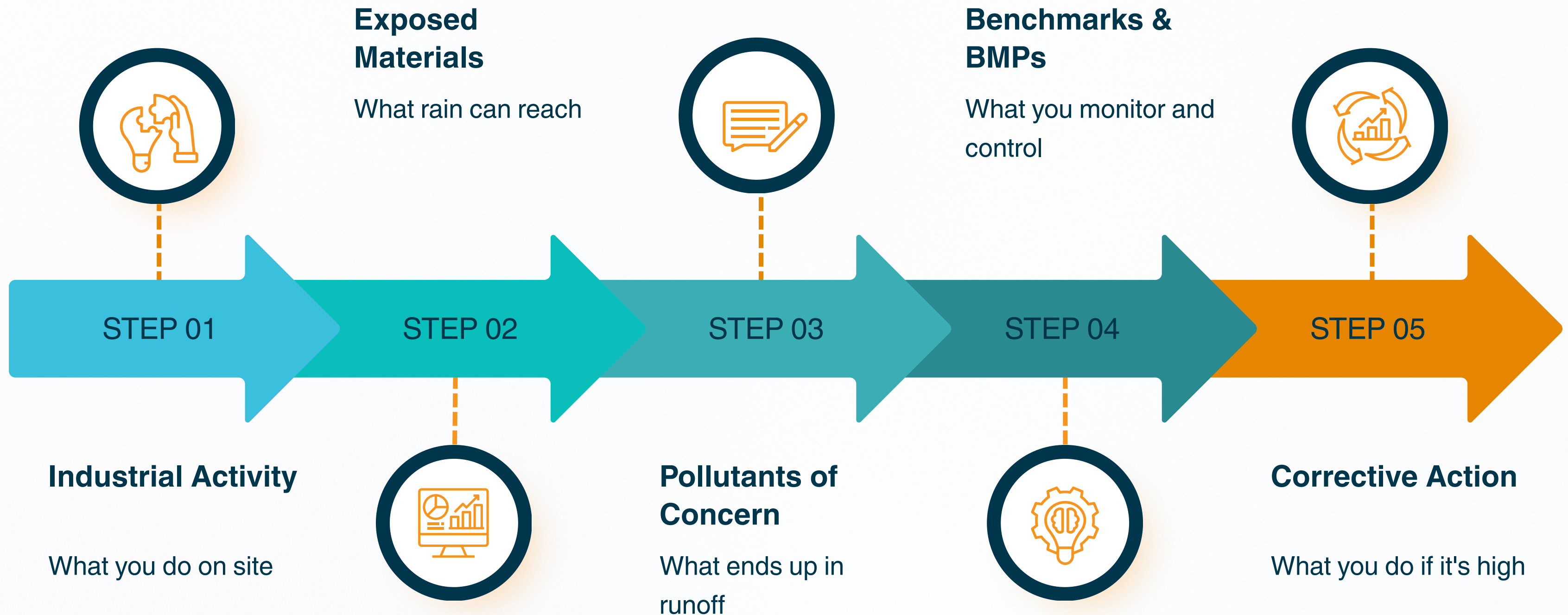
Outdoor operations and uncovered equipment.



Dust & Particulate

Airborne material settling onto surfaces and runoff.

FROM ACTIVITY TO OBLIGATION



Every requirement in your overlay is a link in this chain. Trace it and the permit stops feeling arbitrary.



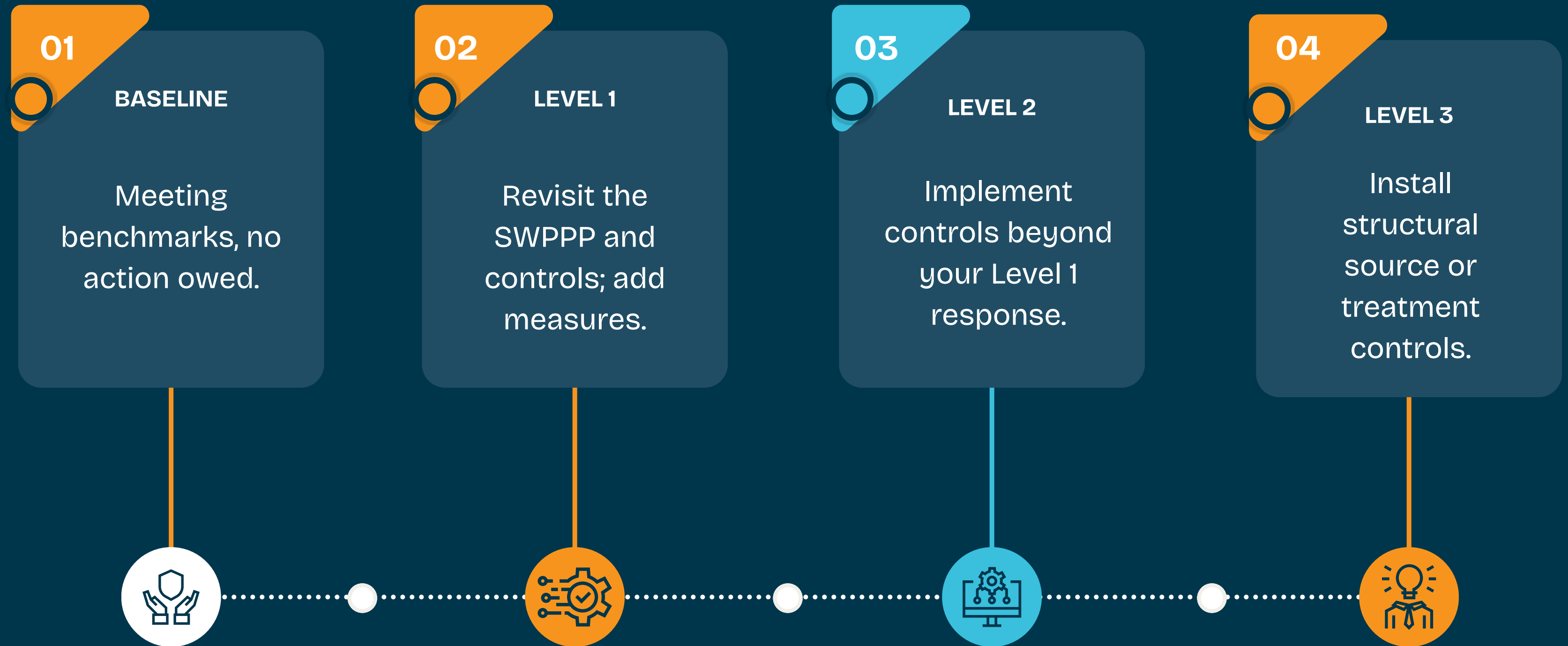
Benchmark vs. Indicator Monitoring



	Benchmark Monitoring	Indicator Monitoring
Purpose	Test whether controls are working for your sector's pollutants	Report a baseline picture of discharge quality
Threshold	Yes: a numeric benchmark to compare against	No: report-only, no value to hit
If a result is high	Triggers a required response (AIM — next slide)	No follow-up triggered
Typical parameters	Sector-specific — the pollutants your industry produces	pH, TSS, COD for subsectors without benchmarks

Plus a third track: facilities discharging to impaired waters without a TMDL monitor annually for the pollutants causing that impairment.

Benchmark Exceedance Flowchart



A benchmark exceedance is a trigger, not an automatic violation. You advance one level at a time, and you reset to baseline once thresholds and responses are met.



Two facilities, One permit



	Scrap recycler – Sector N	Printer – Sector X
Primary Exposure	Exposed metal scrap; shearing and sorting outdoors	Inks and solvents, largely handled indoors
Monitoring Type	Benchmark – sector-specific	Indicator – report-only
Parameters	Metals (aluminum, copper, iron, lead, zinc), plus COD and TSS	pH, TSS, COD
If a result is high	Triggers AIM – review, add controls, possibly treatment	Reported to EPA; no threshold, no required follow-up



CASE STUDY

MOCK FACILITY

Stormwater Pollution Prevention Plan (SWPPP)
Sector P (Land Transportation & Warehousing)

2026 PROPOSED SECTOR P REQUIREMENTS

Mock Facility is based off of the Proposed 2026 MSGP EPA Permit. The EPA Permit tends to be the guide for state authorized NPDES programs

EPA ECHO DETAILED REPORT

National database for industrial facilities, providing facility details, compliance and enforcement records and reporting history

INDUSTRIAL FACILITY ASSESSMENT

Facility Quick Sheet to help facilities identify all required components of their SWPPP and Stormwater Management Program

FACILITY DESCRIPTION AND CONTACT INFORMATION

FACILITY INFORMATION

General Requirements (Permit Reference: Part II.A)

- Facility Name: Mock Transport & Logistics Hub
- Street Address: 1234 Industrial Parkway
- City, State, ZIP Code: Springfield, XX 12345
- County: Acorn County
- Latitude/Longitude: 40.1234° N, -75.5678° W
- NPDES Permit Tracking Number: TN052136
- Primary Industrial Activity SIC Code: 4231 (Trucking Terminal)
- Secondary Industrial Activity SIC Code: N/A
- Sector(s): P
- Total Area of Industrial Activity Exposed to Stormwater: 10 acres



POTENTIAL POLLUTANT SOURCES

INDUSTRIAL ACTIVITIES AND POTENTIAL POLLUTANTS

Industrial Activity	Potential Pollutants
Vehicle fueling	Fuel, oil, heavy metals
Vehicle maintenance	Oil, grease, antifreeze, solvents
Equipment washing	Detergents, oil, grease
Material storage	Debris, dust, packaging waste
Loading/unloading areas	Spilled cargo, hydraulic fluid



POTENTIAL POLLUTANT SOURCES

INDUSTRIAL ACTIVITIES AND POTENTIAL POLLUTANTS

Spills and Leaks

General Requirements (Permit Reference: Part IV.B.4)

- Areas prone to spills include fueling stations, maintenance bays, and loading docks.
- The facility has had two minor oil spills in the past three years, both contained using absorbents.

Unauthorized Non-Stormwater Discharges

General Requirements (Permit Reference: Part IV.B.3)

- Routine inspections confirm no unauthorized discharges.

Sector-Specific Requirements

- **Mock SWPPP is missing Sector Specific Requirements**



STORMWATER CONTROL MEASURES (SCM)

BEST MANAGEMENT PRACTICES (BMPS)

General Requirements (Permit Reference: Part IV.B.5)

- **Good Housekeeping:** Regular sweeping, spill prevention kits at key locations.
- **Spill Prevention & Response:** Employees trained on spill containment; spill kits placed near fueling and maintenance areas.
- **Runoff Management:** Use of oil-water separators and retention basins to filter contaminants before discharge.

Sector-Specific Requirements (Permit Reference: Sector P, Part VIII.P.2)

- **Vehicle Maintenance Practices:** Drip pans used during oil changes; disposal containers for used fluids.
- **Good Housekeeping:** Regular sweeping, spill prevention kits at key locations.
- **Spill Prevention & Response:** Employees trained on spill containment; spill kits placed near fueling and maintenance areas.
- **Vehicle Maintenance Practices:** Drip pans used during oil changes; disposal containers for used fluids.
- **Runoff Management:** Use of oil-water separators and retention basins to filter contaminants before discharge.



STORMWATER CONTROL MEASURES (SCM)

STRUCTURAL CONTROLS

General Requirements (Permit Reference: Part IV.B.2)

- Stormwater drains covered in high-risk areas to prevent contamination.
- Vegetative buffers around facility perimeter to slow runoff.

Sector-Specific Requirements

- Secondary containment around fueling stations. (Sector-Specific Requirement)
- Secondary containment around fueling stations.
- Stormwater drains covered in high-risk areas to prevent contamination.
- Vegetative buffers around facility perimeter to slow runoff.



SCHEDULES AND PROCEDURES

GOOD HOUSEKEEPING

General Requirements

- Waste collection and disposal occur weekly.
- Regular inspections for leaks and spills.
- Waste collection and disposal occur weekly.
- Regular inspections for leaks and spills.



SCHEDULES AND PROCEDURES

MAINTENANCE

General Requirements (Permit Reference: Part IV.B.6)

- Stormwater control measures inspected monthly.
- Immediate repairs made to any damaged spill containment structures

Spill Prevention and Response

General Requirements (Permit Reference: Part IV.B.6)

- Spill kits checked monthly and restocked as needed.
- Employees trained semi-annually on spill response procedures.

EMPLOYEE TRAINING

General Requirements (Permit Reference: Part IV.B.6)

- Annual training on stormwater pollution prevention.
- New employees receive stormwater compliance training during onboarding.



INSPECTIONS AND MONITORING

ROUTINE FACILITY INSPECTIONS

General Requirements

- Conducted quarterly by stormwater team.
- Areas inspected: fueling stations, maintenance bays, material storage zones. (General Requirement)
- Conducted quarterly by stormwater team.
- Areas inspected: fueling stations, maintenance bays, material storage zones.
-

Sector-Specific Requirements

- Mock SWPPP is missing Sector Specific Requirements



ROUTINE FACILITY INSPECTIONS

MONITORING PROCEDURES

General Requirements

- Quarterly visual inspections of stormwater discharges.

Sector-Specific Requirements

- Indicator Monitoring
- Benchmark monitoring for oil & grease, total suspended solids (TSS), and pH levels.

Table 8.P-1		
Subsector (You may be subject to requirements for more than one sector/subsector)	Indicator Monitoring Parameter	Indicator Monitoring Threshold
Applies to all Sector P (Subsector P1) facilities with stormwater discharges from paved surfaces that will be initially sealed or re-sealed with coal-tar sealcoat where industrial activities are located during coverage under this permit	Polycyclic Aromatic Hydrocarbons (PAHs)*	Report Only/ No thresholds or baseline values
Subsector P1. Railroad Transportation (SIC Code 4011, 4013); Petroleum Bulk Stations and Terminals (SIC Code 5171)	Polycyclic Aromatic Hydrocarbons (PAHs)*	Report Only/ No thresholds or baseline values
Applies to all Sector P	Per – and Polyfluoroalkyl Substances (PFAS)**	Report Only/ No thresholds or baseline values



BENCHMARK MONITORING

Table identifies **benchmarks that apply to the specific subsectors of Sector P**. These benchmarks apply to both your primary industrial activity and any co-located industrial activities.

These pollutants are **dependent on water hardness** where discharged into freshwaters. The freshwater benchmark value listed is based on a hardness of 100 mg/L.

When a facility analyzes receiving water samples for hardness, the operator must use the hardness ranges provided in Table 1 in Appendix J of the 2026 MSGP to determine applicable benchmark values for that facility.

Benchmark thresholds for discharges of these pollutants into saline waters are not dependent on receiving water hardness and do not need to be adjusted.

Parameter	Benchmark Monitoring Concentration
COD	120 mg/L
Total Suspended Solids (TSS)	100 mg/L
pH	6.0 – 9.0 s.u.
Total Recoverable Lead (freshwater) ¹	65 µg/L
Total Recoverable Lead (saltwater)	210 µg/L
Hardness	No Benchmark Listed
Total Recoverable Arsenic (freshwater)	340 µg/L
Total Recoverable Arsenic (saltwater)	69 µg/L
Total Recoverable Cadmium (freshwater) ¹	1.8 µg/L
Total Recoverable Cadmium (saltwater)	33 µg/L
Total Recoverable Copper (freshwater)	5.19 µg/L
Total Recoverable Copper (saltwater)	4.8 µg/L
Total Recoverable Mercury (freshwater)	1.4 µg/L
Total Recoverable Mercury (saltwater)	1.8 µg/L
Total Recoverable Zinc (freshwater) ¹	120 µg/L
Total Recoverable Zinc (saltwater)	90 µg/L





Proposed 2026 MSGP Updates

MONITORING

Report-only PFAS proposed across 23 sectors; broader parameters such as metals and nutrients, on the table.

INDICATOR → BENCHMARK

11 subsectors would move from report-only into threshold-based monitoring — results that carry consequences.

IMPAIRED WATERS

Monitoring expands to quarterly, with a corrective-action trigger.

RESILIENCE & HOUSEKEEPING

Controls designed for major-storm conditions, a new narrative against visible sheen or foam, and expanded good-housekeeping expectations.

ESA and NHPA

Endangered Species Act and National Historic Preservation Act documentation



Take Action Today

- 1** **Confirm your permitting authority.** EPA or a delegated state? Most facilities answer to a state program on its own timeline.
- 2** **Map your sector(s) and Part 8 overlay.** Account for every co-located activity, not just the dominant one.
- 3** **Sort your parameters.** Know which are benchmark (with a trigger) and which are indicator (report-only).
- 4** **Pressure-test the record.** SWPPP current, monitoring logged, corrective actions documented — ready for an inspection.
- 5** **Build toward the 2026 direction.** Broader monitoring and PFAS attention are coming. Prepare and invest where the regulator is pointing.



The Permit Changes. The Competency Doesn't.

Reading your sector, building a defensible SWPPP, running an inspection that holds up, catching an exceedance early, these are skills, not paperwork. These are skills that carry across every version of the permit, and across every country's system.

Competency = Confidence



Whats Needed to Do the Work



The Craft

Regulatory Literacy — Know your permit cold

Systems Thinking — Activity → Pollutant → Control
→ Water

Problem solving — Chase an exceedance to its root

Efficiency — Build once, reuse; don't reinvent

Documentation discipline — If it isn't written, it didn't happen

Communication — Translate the permit into action

The Character

Curiosity — Follow the water; keep asking why

Flexibility — Every site and state is different

Teaching mindset — It sticks when the crew gets it

Rigor — A missed outfall is a finding

Skepticism — The plan is a hypothesis; the site is the truth

Integrity — You certify under penalty of law

Almost none of this is written in the permit. The permit says what to do, these are what make someone good at doing it.

Key Takeaways

- 1 One backbone, one overlay. Parts 1–7 are identical for everyone; Part 8 is what makes your compliance yours.
- 2 Your sector is the master key. It drives what you monitor, what you control, and what happens when a result runs high.
- 3 The permit is between versions, strat by mapping your obligations now. The competency and confidence outlasts the permit.



Questions

Drop them in the chat or Q&A panel. Unsure which category a site is in, whether a No Exposure Certificate fits, or who your permitting authority is? Let's work it.



ONE ASK BEFORE WE CLOSE

Add your voice to the standard

The **Global Stormwater Competency Model** is an open survey mapping the competencies found across our field, where the profession is strong, where it's thin, and where training and support should go next.

Ten minutes of your experience helps build a picture no single company can see alone.



Scan the code, or go to
surveymars.com/q/yQxiyumVX

THANK YOU

Let's keep the conversation going

Looking For stormwater training, custom programs, SWPPP development, or MS4 consulting?

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