



# Industrial Stormwater Compliance: 7 Common Mistakes and Solutions

Industrial activities such as material handling, storage, and equipment maintenance often occur outdoors, where rain or snowmelt can carry pollutants into storm drains and waterways, degrading water quality. Federal regulations require stormwater discharges from certain industrial sectors to be covered by a National Pollutant Discharge Elimination System (NPDES) permit. This is typically either an individual permit or a Multi-Sector General Permit (MSGP).

Compliance means implementing best management practices (BMPs), maintaining a Stormwater Pollution Prevention Plan (SWPPP), and monitoring discharges. This brief focuses on common compliance mistakes and practical fixes to help facilities meet permit requirements and protect water resources.

**MISTAKE**

**1**

## **Incomplete or incorrect No Exposure Certification (NEC)**

**SOLUTION**

Federal stormwater requirements mandate that operators certify that their site's industrial materials and activities are fully sheltered from precipitation to qualify for an NEC. Review every potential exposure pathway. Ensure that materials, equipment, and activities are all fully sheltered from stormwater. Confirm that your site truly meets the "no exposure" standard before certifying.

# Industrial Stormwater Compliance: 7 Common Mistakes and Solutions (continued)

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Resubmit your NEC at least every five years or immediately when site conditions change (such as new outdoor storage or process modifications).

## MISTAKE

### 2 Failure to follow sector-specific requirements

**SOLUTION** Each industrial sector has unique stormwater risks that require tailored controls under the MSGP. Review the sector-specific section of your permit carefully. Identify all required BMPs, monitoring parameters, and reporting obligations for your industry. Train staff on these requirements and integrate them into your SWPPP.

## MISTAKE

### 3 Failure to monitor discharges

**SOLUTION** Benchmark monitoring and reporting are major components of the NPDES program. The MSGP requires scheduled sampling, visual inspections, and timely Discharge Monitoring Report (DMR) submissions. Follow your permit's benchmark monitoring requirements to the letter. Schedule sampling during qualifying storm events and train staff on proper collection procedures. Submit DMRs on time, every time. Use reminders, calendars, or automated alerts to stay ahead of deadlines.

## MISTAKE

### 4 Failure to update the SWPPP

**SOLUTION** The MSGP requires the SWPPP to be reviewed and revised to reflect operational changes, inspection results, and BMP performance. An outdated SWPPP misses new exposures, undermines compliance, and raises enforcement risks. Treat your SWPPP as a living document. Review and update it after inspections, spills, or any operational changes. Ensure your site map, BMPs, training logs, and responsible personnel are current. Document updates and keep copies accessible for audits.

## MISTAKE

### 5 Missed employee training

**SOLUTION** The MSGP requires facilities to have an initial and annual training program in place for all employees on the specific requirements of the facility's SWPPP. Make training a core part of your compliance program. Provide initial and refresher training on SWPPP requirements, BMPs, and emergency procedures for all staff involved in industrial activities. Document attendance and topics covered. Incorporate hands-on demonstrations and site-specific



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examples to reinforce learning. Schedule annual refreshers and update training whenever processes or permit conditions change.

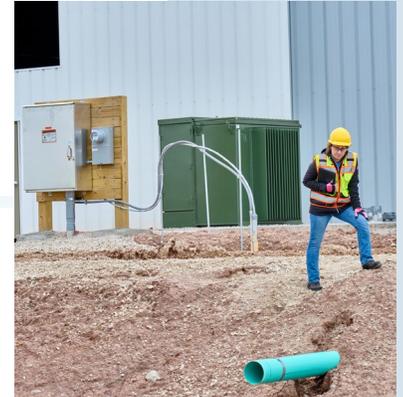
**MISTAKE**

**6**

## Ignored structural BMPs

**SOLUTION**

The NPDES program mandates BMPs to prevent pollutant contact and reduce exposure. Install robust structural BMPs such as berms, curbing, covered storage areas, and secondary containment for liquids. Pair these with strong housekeeping practices to keep surfaces clean and minimize pollutant exposure. Inspect these controls regularly and repair any damage immediately.



**MISTAKE**

**7**

## Missed routine inspections and visual assessments

**SOLUTION**

Inspections are required at least quarterly and, in some instances, more frequently. Each inspection report must include the date and time, inspector names and signatures, weather conditions, observations of stormwater control measures, evidence of discharges or pollutants, and any maintenance or corrective actions needed. If a quarterly visual assessment is performed during the inspection, include those results in the same report. Maintain all inspection documentation with your SWPPP and summarize findings in your Annual Report.

*Note: Always consult your facility's applicable state MSGP or individual NPDES permit for specific requirements.*

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