



# **Making Sense of the Multi-Sector General Permit (MSGP)**

## **2025 Midwest Environmental Compliance Conference**

September 15, 2025

Stanley Consultants, Inc.

Stephanie Broden, EIT

# Agenda



Introductions



Federal Industrial  
Stormwater



Permit Timeline



What's new in  
MSGP 2026



Complying with  
MSGP 2026



Q&A

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Future-Focused Thinking**



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differently: higher quality, faster  
and with less risk.

**Environmental Compliance Services:**

- Environmental Sampling:
  - Stormwater
  - Sanitary water
  - Drinking water
  - Soils, Air, + more
- Stormwater Pollution Prevention Plans (SWPPP)
- Soil Erosion and Sediment Control (SESC) Plans
- Spill Prevention, Control, and Countermeasure (SPCC) Plans
- Phase I and Phase II Environmental Site Assessments
- Antidegradation Analysis
- Wetland Delineation

+ more!

Come see us  
at Booth 7!

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# Industrial Stormwater

- Presents a unique challenge to water treatment systems
- Stormwater discharges associated with specific categories of industrial activity must have permit coverage
  - material handling equipment and activities
  - industrial machinery
  - raw materials
  - intermediate and final products
  - by-products
  - waste products



# Stormwater Monitoring Overview

## Visual Assessment

visual indicators trigger corrective actions (odor, oil sheen, solids, etc.)

## Indicator Monitoring

“report only”, does not include thresholds or baselines for comparison

## Benchmark Monitoring

“red flag”, uses existing thresholds, triggers AIM levels

## Effluent Limitations Monitoring

sampling is required to determine compliance with federal limits

**Part 8 of the 2021 MSGP** includes the indicator, benchmark, and ELG monitoring requirements for each of the affected industrial sectors

# Multi-Sector General Permit (MSGP)

- USEPA delegates authority to many states to manage their own stormwater (KDHE, IDNR, MoDNR, etc.)
- MSGP allows for general permit coverage for states and tribes under USEPA jurisdiction
- Approximately 2,000 industrial facilities are currently covered under the MSGP in areas where USEPA is the NPDES permitting authority



Federal regulations at  
[40 CFR 122.26\(b\)\(14\)\(i\)-\(xi\)](#)



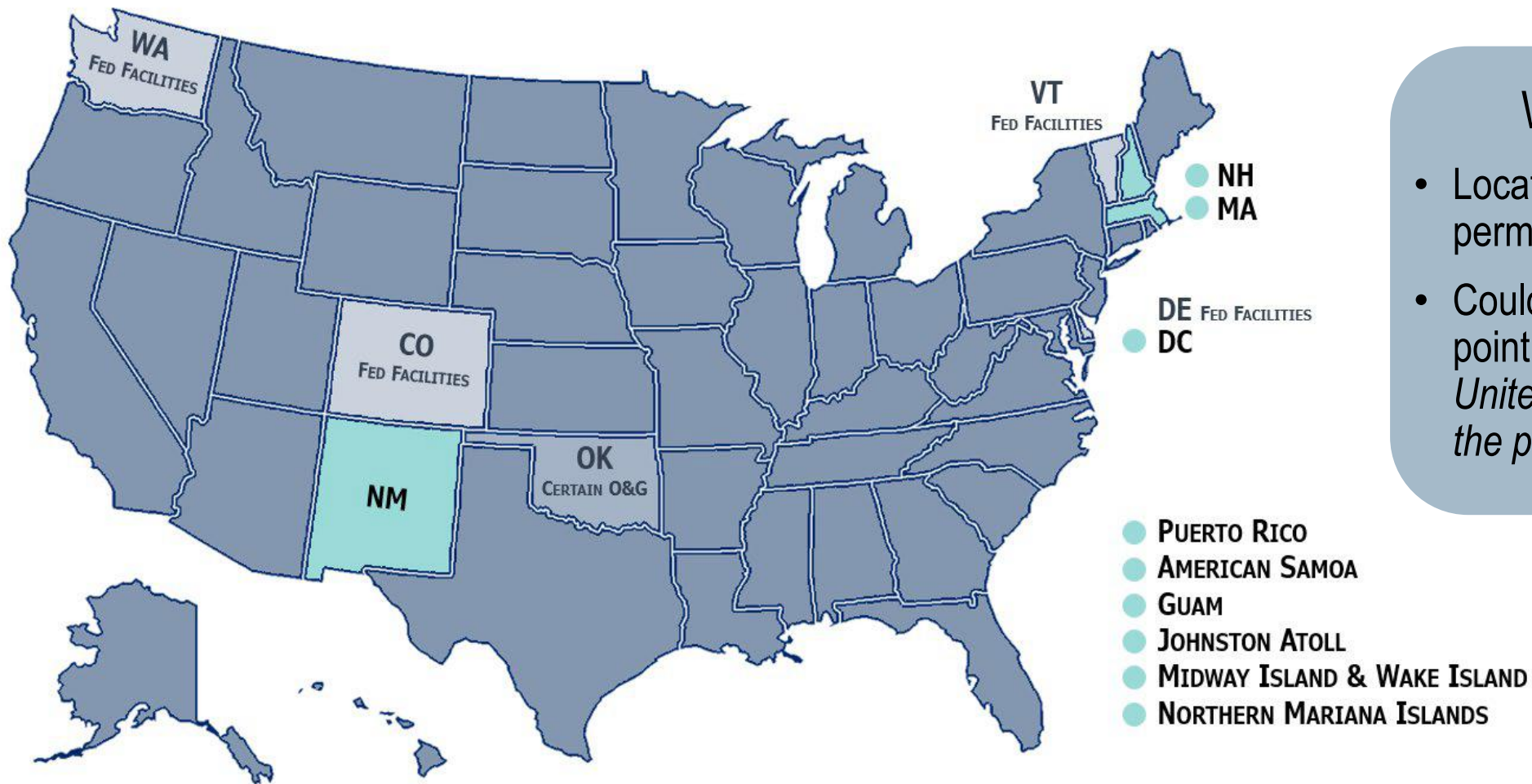
# MSGP Sectors

**The MSGP authorizes stormwater discharges from the following eligible sectors:**

A: Timber Products  
B: Paper Products  
C: Chemical Products  
D: Asphalt/ Roofing  
E: Glass, Clay, Cement  
F: Primary Metals  
G: Metal Mining  
H: Coal Mines  
I: Oil and Gas  
J: Mineral Mining

K: Hazardous Waste  
L: Landfills  
M: Auto Salvage Yards  
N: Scrap Recycling  
O: Steam Electric Generation  
P: Land Transportation  
Q: Water Transportation  
R: Ship/Boat Building, Repair  
S: Air Transportation  
T: Treatment Works

U: Food Products  
V: Textile Mills/Fabric Products  
W: Furniture/Fixtures  
X: Printing, Publishing  
Y: Rubber, Misc. Plastics Products  
Z: Leather Tanning/Finishing  
AA: Fabricated Metal Products  
AB: Transportation Equip.  
AC: Electronic, Photo Goods  
AD: Non-classified Facilities



## Who is eligible?

- Locations where EPA is the permitting authority
- Could also include discharge point location of *water of the United States* where *EPA is the permitting authority*

Source: USEPA 2025

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# Permit Timeline

**February 28, 2026** – EPA intends to issue the final 2026 MSGP prior to expiration of 2021 MSGP – applies immediately to affected facilities

For other facilities – state permits will update with next permit cycle to follow new federal requirements (3-8 years)

Start working towards compliance now to save \$\$\$ down the road!



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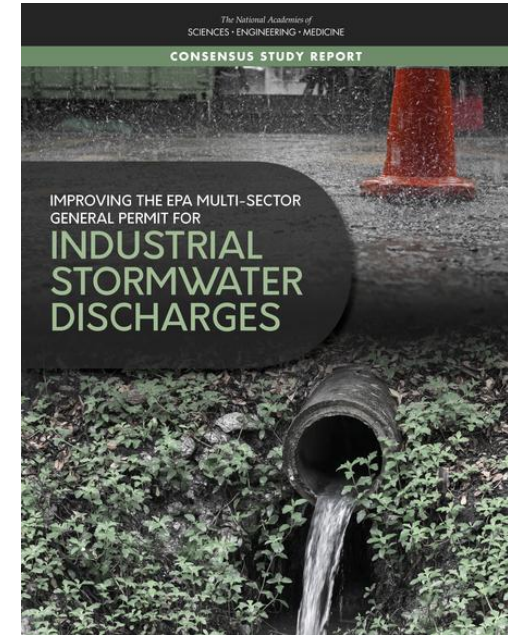
Complying with  
MSGP 2026



Q&A

# Why change the MSGP?

- Follows a 2019 study conducted by the National Academies of Sciences, Engineering, and Medicine's (NAS) National Research Council
- 2026 MSGP builds upon changes made in 2021 MSGP based on suggestions from the 2019 study
- In general: adding more stringent requirements over time, more enforcement of regulations



[Improving the EPA Multi-Sector General Permit for Industrial Stormwater Discharges | The National Academies Press](#)

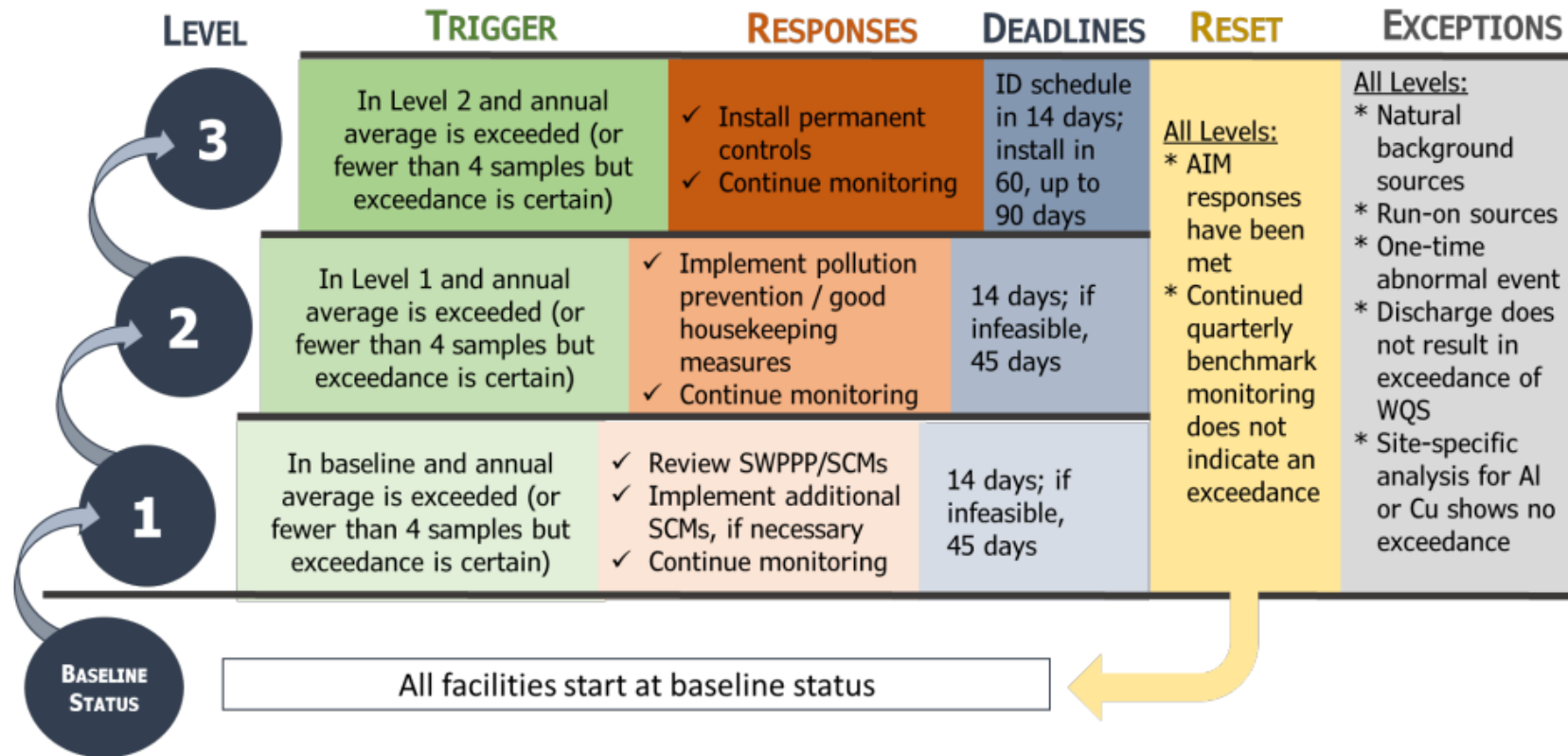


# Overview of Major Changes

- Additional Implementation Measures (AIM)
- Benchmark Monitoring
- Impaired Waters
- Resilient Stormwater Control Design
- Water Quality Based Effluent Limit (WQBEL)
- PFAS Indicator Monitoring



# Additional Implementation Measures (AIM) – 2021 MSGP



# Additional Implementation Measures (AIM) – 2026 Updates

## 2021 MSGP

## 2026 MSGP

Part 5.2

AIM documentation is reported as part of the annual report



AIM Triggering Event Report within 14 days of the AIM Triggering Event

Part 5.2.3.1

If AIM Level 1 is triggered – document in annual report why exceedances will be reduced by control measures



Investigate cause of exceedance(s): conduct inspection within 7 days of trigger and submit results electronically (+SWPPP)

Part 5.2.6.1

Must submit exception analysis to EPA Regional Office upon request and can support rationale with any data previously collected (including literature studies)



Must obtain EPA agreement of exception and support rationale with analytical results of uncontaminated stormwater from undisturbed areas

# AIM Triggering Event Report

Within 14 days of the AIM Triggering Event:

- A description of the planned corrective action
- The planned date of the corrective action

Within 14 days of completing the corrective action:

- The actual date of completion
- Any changes to the planned corrective action

# Benchmark Monitoring

## 2021 MSGP

Part  
4.2.2.3 (a)

Quarterly monitoring required in Years 1 and 4 (if no AIM triggering event occurred)

Part  
4.2.3

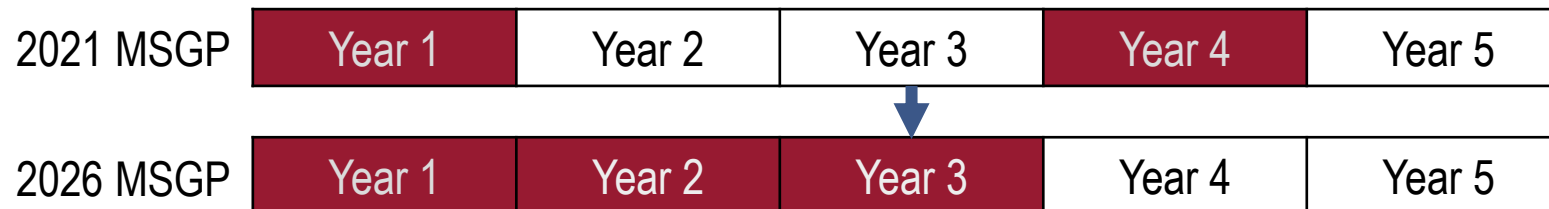
Unclear definition of when monitoring can be discontinued

## 2026 MSGP

Quarterly monitoring for first three years, then if no AIM events occur, monitoring for that parameter may be discontinued\*

Clarification: minimum of twelve numeric results are needed before the operator can discontinue monitoring

\*for the remainder of the permit term



# Benchmark Monitoring



## 2021 MSGP

Benchmark monitoring for listed subsectors



## 2026 MSGP

Benchmark monitoring for **11 additional subsectors** that have a history of far exceeding benchmarks (previously only required indicator monitoring)

- E3 – Glass and Stone Products
- I1 – Oil and Gas Extraction
- L2 – Landfills
- N2 – Source – separated Recycling Facilities
- O1 – Steam Electric Generating Facilities
- P1 – Land Transportation and Warehousing
- R1 – Ship and Boat Building and Repairing Yards
- U3 – Meat and Dairy Products
- Y2 – Misc. Plastics
- AB1 – Transportation Equipment, Commercial Machinery
- AD1 – Non-Classified Facilities (designated by director)



# Impaired Waters

## 2021 MSGP

## 2026 MSGP

Part  
4.2.5.1

Schedule applied to impaired waters  
**without** an EPA-approved TMDL



Schedule applies to impaired waters **with  
or without** an EPA-approved TMDL

Part  
4.2.5.1

Annual monitoring during 1<sup>st</sup> and 4<sup>th</sup> years  
of permit coverage (unless pollutant  
causing impairment is detected)



Quarterly monitoring for the entirety of  
the permit term

Part  
4.2.5.1(a)

No Equivalent



Corrective action required when a pollutant  
of concern is detected:  
- AIM Level 1 Responses

# Resilient Stormwater Control Design

Part  
2.1.1.8

2021 MSGP

Implement improvements to minimize impacts from major storms or flood events



2026 MSGP

Proactive approach: while implementing improvements, operators must consider if the facility has experienced or may experience major storm/flood events **based on best available data**



# Water Quality Based Effluent Limit (WQBEL)

## 2021 MSGP

Part  
2.2

“Control discharges as necessary to meet water quality standards”



## 2026 MSGP

- 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 Indicator Monitoring



2021 MSGP

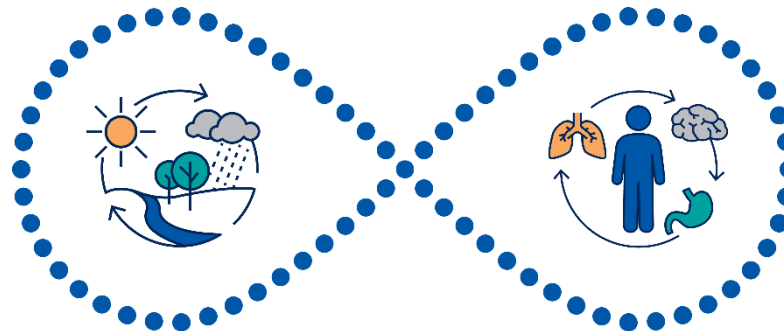
No Equivalent



2026 MSGP

Applies to **most sectors** – quarterly “report-only” indicator analytical monitoring for PFAS, beginning in the first full quarter of permit coverage

Monitoring applies to the 40 PFAS compounds listed in EPA Method 1633 (using EPA Method 1633)



# PFAS Indicator Monitoring

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M: Auto Salvage Yards  
N: Scrap Recycling  
O: Steam Electric Generation  
P: Land Transportation  
Q: Water Transportation  
R: Ship/Boat Building, Repair  
S: Air Transportation  
T: Treatment Works

U: Food Products  
V: Textile Mills/Fabric Products  
W: Furniture/Fixtures  
X: Printing, Publishing  
Y: Rubber, Misc. Plastics Products  
Z: Leather Tanning/Finishing  
AA: Fabricated Metal Products  
AB: Transportation Equip.  
AC: Electronic, Photo Goods  
AD: Non-classified Facilities



# PFAS Stormwater Sampling

More complex than other types of parameter sampling = more expensive

- Hazardous substance: could involve higher training requirements
- High sensitivity of measurement techniques (parts-per-trillion)
- Requires extra precautions to prevent sample contamination
  - Non-waterproof clothing (only 100% cotton), minimize personal care products (no lotions, hairspray, makeup, perfume, etc.)
  - Frequent nitrile glove changes
- Risk of contamination from rain events – hard to isolate samples from active rain
- Decontamination or replacement of equipment needed between sampling





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# MSGP Compliance Checklist

- 1 Check eligibility requirements
- 2 File Notice of Intent (NOI) at least 30 days before discharging
- 3 Develop or update Stormwater Pollution Prevention Plan (SWPPP)
- 4 Install Control Measures / BMPs
- 5 Conduct Routine Inspections and Quarterly Visual Assessments
- 6 Conduct required parameter monitoring
- 7 Complete any Required Corrective Actions and AIM
- 8 Complete required reporting
- 9 Comply with Sector-Specific Requirements
- 10 Comply with State/Tribal-Specific Requirements



# Thank you!

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## References and Additional Information:

- [Stormwater Discharges from Industrial Activities-EPA's 2021 MSGP | US EPA](#)
- [Stormwater Discharges from Industrial Activities-EPA's Proposed 2026 MSGP | US EPA](#)
- [Proposed 2026 MSGP – Fact Sheet](#)
- [CWA Permitting of Industrial Stormwater: Reissuance of EPA's MSGP](#)
- [Improving the EPA Multi-Sector General Permit for Industrial Stormwater Discharges | The National Academies Press](#)
- [40 CFR 122.26\(b\)\(14\)\(i\)-\(xi\)](#)
- [Engineering Consultants | Stanley Consultants](#)
- [MSGP Industrial Stormwater Monitoring and Sampling Guide, April 2021](#)
- [Method 1633A Analysis of Per- and Polyfluoroalkyl Substances \(PFAS\) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS](#)

