

# Antidegradation and Stormwater

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# The Situation

- Many industrial activities are required to have a storm water permit [10 CSR 20-6.200].
- In MO, some of these are Site Specific Permits, most are authorized via General Permits.
- The AIP states that antidegradation reviews will be conducted for General Permits when they are renewed [or when new ones are issued]. But...
- The AIP does not say how to do it.

# Site Specific or General Permits

- How do we determine limits for General Permits that are protective of all streams?
- Existing water quality cannot be determined without an extensive, multi-year study.
- Therefore Alternatives Analysis seems to be the only practical path.
- This can be done as part of the Storm Water Pollution Prevention Plan (SWPPP).

# Storm water Alternatives Analysis

- Non Degrading Alternatives must be evaluated:
  - No Exposure must be examined, shown why it's not feasible.
  - Establish why no discharge is not feasible.
- Show alternatives (BMPs) considered, including those determined not to be economically efficient.

# Not Just a Paperwork Exercise

- Chosen alternatives will often result in better quality discharge than the minimum needed to protect standards.
- Facility will be held to the use of the chosen BMP. Failure to implement the BMPs in the Alternatives Analysis is a violation.
- Alternatives Analysis may be reviewed during the inspection, or upon demand by the department