

**General Permits 101:  
LPDES Permit Program  
2025 Air & Waste  
Management Conference,  
Louisiana Section  
October 30, 2025**



# LPDES Purpose and Scope

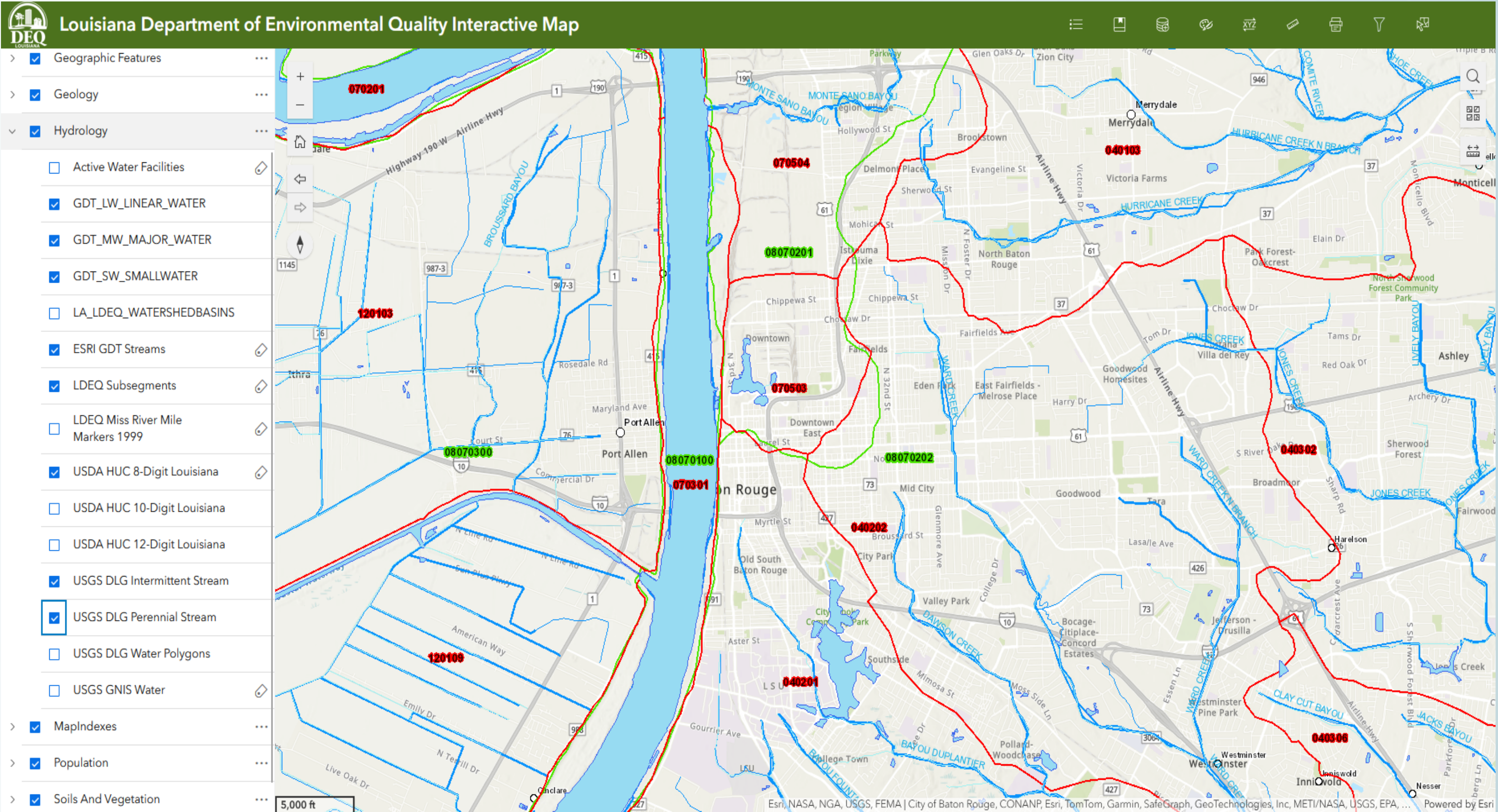
## Louisiana Pollutant Discharge Elimination System

- A program that requires permits for the discharge of pollutants/wastewater from any **point source** into waters of the state.



# LPDES Purpose and Scope

## Waters of the State – 40 CFR 122.2



## Why Are LPDES Permits Important?

The limitations and requirements imposed in the permits:

- help prevent deterioration of the quality of the State's water bodies and
- help prevent public health concerns associated with poorly treated wastewater.

### Other Option?



- Eliminate the discharge:
  - How?
    - Connect to a Publicly Owned Treatment Works (POTW) or
    - Install a Louisiana Department of Health (LDH) approved no discharge system (sprinkler system or overland flow)
  - The Problem:
    - Most dischargers are not located in an area where community systems are available.
    - Zero discharge systems require space for application.

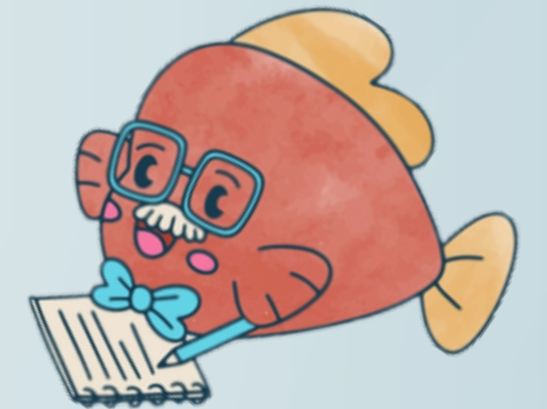
## Types of Permits

**Individual Permits** – one permit to authorize one facility

- Majors
- Minors
- Classification is determined by the following:
  - Industrial – determined by point system
  - Municipal – 1 million gallons/day or greater

**General Permits** – one permit to authorize several similar facility types

- Storm water
- Non-storm water



## General Permits

- Authorized under LAC 33:IX.2515, which allows the state administrative authority to issue a general permit for discharges based on facility location and on facility type.
- A Notice of Intent (NOI) is typically required for coverage under a general permit.
- LDEQ may require a discharger authorized under a general permit to apply for and obtain an individual permit. For example, the following conditions:
  - noncompliance with the conditions in the general permit;
  - effluent limitation guidelines are promulgated with new limitations not addressed in the general permit;
  - a change in the Water Quality Management Plan resulting in new limitations not addressed in the general permit;
  - circumstances at the facility have changed resulting in the facility not meeting the eligibility requirements of the general permit; and/or
  - the discharge is a significant contributor of pollutants.



## **General Permits: Non-Storm Water General Permits**

- Vessel Cleaning and/or Repair Facilities and Shipyards (LAG030000)
- Cement, Concrete & Asphalt Facilities (LAG110000)
- Oil and Gas Exploration, Development and Production Facilities Located Within Territorial Seas of Louisiana (LAG260000)
- Dewatering of Petroleum Storage Tanks, Tank Beds, New Tanks & Excavations (LAG300000)
- Oil and Gas Exploration, Development and Production Facilities in Coastal Waters (LAG330000)
- Potable Water Treatment Plants (LAG380000)
- Short-Term and Emergency Discharge (LAG420000)
- Automotive Dealerships, Paint & Body Shops, Automotive Repair Facilities, Motorcycle Dealerships and RV Dealerships (LAG470000)
- Light Commercial General Permit (LAG480000)
- Sand and Gravel Extraction (LAG490000)
- Sanitary Wastewater Discharges Less Than 100,000 GPD (LAG530000, LAG540000, LAG560000, and LAG570000)
- Hydrostatic Test Wastewater (LAG670000)
- Exterior Vehicle Wash Water (LAG750000)
- Construction/Demolition Debris and Woodwaste Landfills (LAG780000)
- Pesticides General Permit (LAG870000)
- Cleanup of Petroleum Underground Storage Tanks (LAG830000)



# General Permits: Storm Water General Permits

## Storm Water General Permits (4)

- Storm Water Associated with Industrial Activity (Multi-Sector General Permit) (LAR050000)
- Storm Water Discharges from Small Construction Activities (LAR200000)
  - Construction activities that disturb equal to or greater than one acre and less than five acres of total land area
- Storm Water Discharges from Large Construction Activities (LAR100000)
  - Construction activities that disturb greater than five acre acres of total land area
- Municipal Separate Storm Sewers Systems (MS4) (LAR040000)

LAR05, LAR10, and LAR20: Requires a Storm Water Pollution Prevention Plan (SWPPP) – includes Best Management Practices (BMPs) and Activities

LAR04: Requires a Storm Water Management Plan (SWMP)



## Authorization Process for Coverage Under a General Permit

- LDEQ public notices and issues ‘Master’ General Permit
- EPA has 90 days to review/approve ‘Master’ General Permits
- Applicant submits Notice of Intent (NOI) – available on LDEQ web page (electronic forms are in development)
- Authorization may be automatic or require specific authorization by LDEQ.
  - If automatic, authorization is effective within a certain time frame of submittal of a complete NOI (“self-implementing” permit).
  - Specific authorization upon approval by the LDEQ after submittal of a complete NOI.

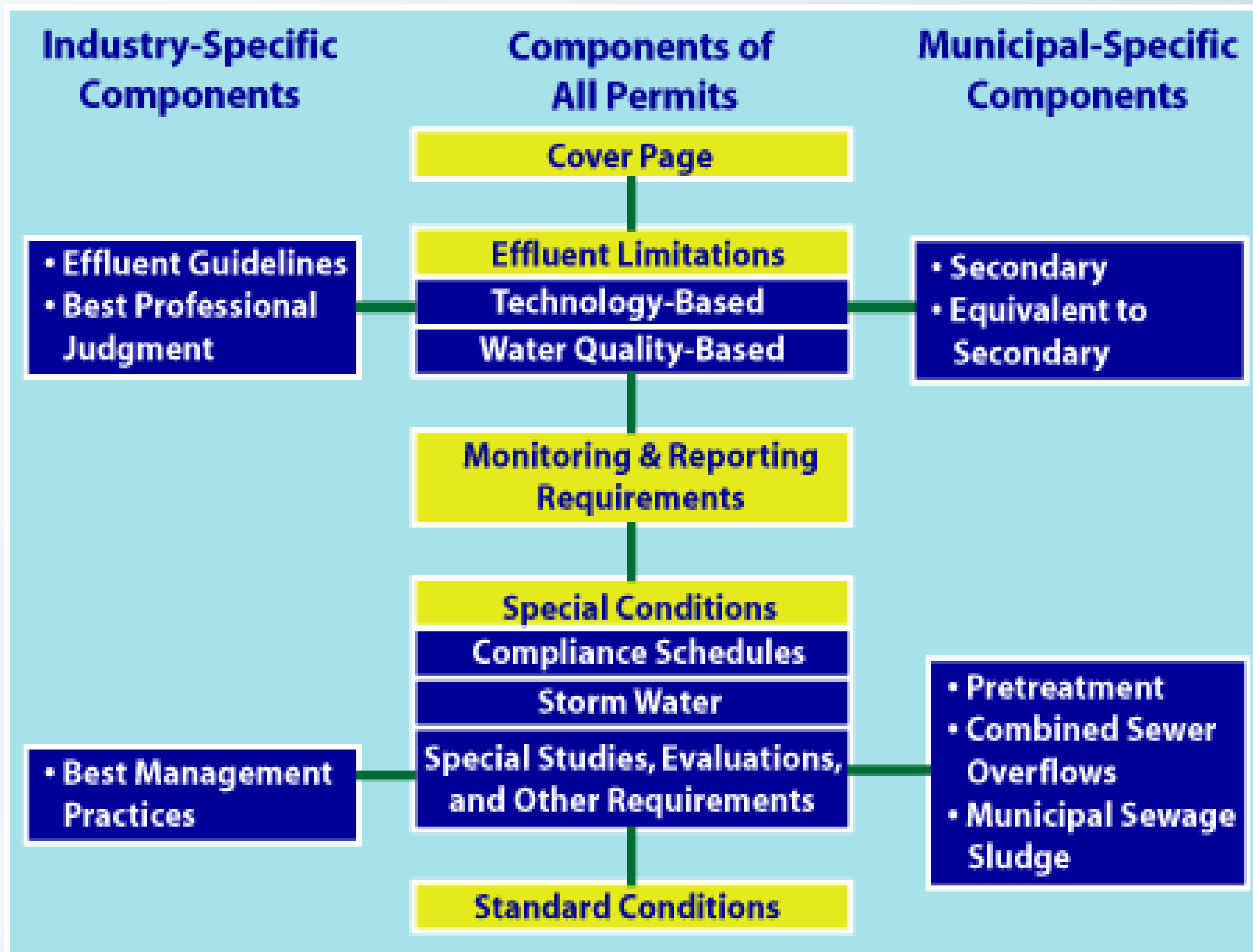


## Coverage Under a General Permit: Authorization Letter

- A copy of the Master General Permit will NOT be sent with the permit authorization. The cover letter will include a link and/or an EDMS Document Number to the general permit.
- The permit authorization letter acknowledges receipt of the permit NOI and the Department's decision to authorize coverage under a general permit
  - Date stamped on the letter of the permit is the date your permit coverage begins.
- Appendix A – Very Important!
  - Summarizes which schedules from Part I of the Master General Permit that apply to your specific permit authorization.
  - Most general permits contain several permit schedules to cover different possible scenarios.
  - Lists the outfall number and location
  - Discharge description – Treated Sanitary Wastewater
  - Final Effluent Limitations and Monitoring Requirements (Applicable Schedules, Interim Dates, etc.)



# Parts of a Master General Permit



## Master General Permits: Class I Sanitary General Permit

- The Class I Sanitary General Permit is the most widely issued non-stormwater general permit.
- Eligible facilities are discharges of treated sanitary wastewater totaling less than 5,000 GPD.
- Universe is approximately 4,356 facilities.
- Types of facilities covered under this permit: restaurants, gas stations, office buildings, laundromats, and small trailer parks, etc.
- The general permit contains “schedules” of applicable permit limits and monitoring requirements
- Not all schedules apply to every facility – see your Appendix A
- Different schedules are included to accommodate facility types, sizes, and TMDL requirements



# Master General Permits: Class I Sanitary General Permit

## EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

During the period beginning          with written notification of coverage under this permit          and lasting through          the expiration date of this permit,          the permittee is authorized to discharge treated sanitary wastewater and/or other accepted wastewater totaling less than 2,500 gallons per day maximum expected flow from the specified facility in accordance with the following limitations:

### SCHEDULE A<sup>1</sup> – FINAL EFFLUENT LIMITATIONS

EFFLUENT CHARACTERISTICS	DISCHARGE LIMITATIONS		MONITORING REQUIREMENTS	
	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY <sup>2</sup>	SAMPLE TYPE
FLOW – GPD	N/A	2,500 <sup>7</sup>	1/12 months	Estimate
BOD <sub>5</sub> , mg/L	N/A	45	1/12 months	Grab
TSS <sup>3</sup> , mg/L	N/A	45	1/12 months	Grab
FECAL COLIFORM <sup>4, 5</sup> , number / 100 mL	N/A	400	1/12 months	Grab
pH – allowable range (standard units) <sup>6</sup>	6.0 (min)	9.0 (max.)	1/12 months	Grab

<sup>1</sup> Upon written notification of coverage under this permit, the permittee shall comply with the effluent limitations schedule(s) stated in Appendix A of the permit authorization. Schedule A will apply to facilities that discharge less than 2,500 GPD and have no food service waste, laundromat wastewater, nor are regulated under LAC 33:IX.2511.B.14.

<sup>2</sup> Certain facilities of concern are subject to a monitoring frequency of 1/6 months. Instructions will be given in the cover letter and/or Appendix A of the permit authorization if this condition is applicable to the permittee.

<sup>3</sup> If the treatment unit is an oxidation pond, the daily maximum limitation may be 135 mg/L. If this limit applies, it will be noted in Appendix A of the permit authorization.

<sup>4</sup> If chlorination is chosen as the disinfection method, see Part II, Section E.

<sup>5</sup> If the discharge is directly to a waterbody which is named in the LAC 33:IX.1123.Table 3, and which has a designated use of oyster propagation, the fecal coliform limitations will be 43 number / 100 mL daily maximum. Appendix A of the permit authorization states if the more stringent limitations apply.

<sup>6</sup> The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units. The permittee shall report both the minimum and maximum instantaneous pH values measured.

<sup>7</sup> An exceedance of the flow as a result of a change in the calculated expected flow, a change in design capacity, or connection of other sources is a violation of the permit. However, exceedances due to infiltration and inflow as a result of storms or other unusual events may be allowed. Permittees must submit additional documentation explaining flow exceedances with DMR submittals.



## Master General Permits: MSGP

### Applicability:

- The Multi-Sector General Permit (MSGP) authorizes discharges of storm water within the state of Louisiana from industrial facilities as defined in LAC 33:IX.2511.B.14.a-i and k.
- Facilities eligible for coverage under this permit must have discharges composed entirely of storm water associated with industrial activity from the facility's primary industrial activity and co-located industrial activity(ies), as defined in Part 7, provided that these industrial activities are included in Table 1, or the facilities must be notified of permit eligibility by the LDEQ. For facilities where a primary SIC code cannot be identified due to multiple types of operations: if 50% of operations fall under one or more of the SIC codes listed in Table 1, the facility is eligible for coverage under this permit.
- Industry-specific requirements under 29 Sectors.
- Contains requirements similar to EPA's MSGP Permit.



# Master General Permits: MSGP



Photo #: 1 of 8 Date: 9/24/2024 Time: 9:30 AM  
Description: Layout of the first corridor of large tanks towards the front of the facility. Tanks holding multiple chemicals. No containment seen around these tanks.



Figure 18. Example of visual observation indicating stormwater discharge exposed to pollutants.



# Master General Permits: MSGP

Monitoring Period:

## 3.2.3.1 Monitoring Period

Benchmark monitoring shall be conducted quarterly in years 2 and 4 of the permit, years 2022 and 2024, respectively. The annual monitoring period is from January 1 to December 31. The monitoring quarters are January 1 to March 31; April 1 to June 30; July 1 to September 30; and October 1 to December 31. If the facility's permit coverage was effective less than one month from the end of the quarterly or yearly monitoring period, the first monitoring period starts with the following quarter.

Note: The next master general permit is expected to follow a similar monitoring period.



# Master General Permits: MSGP

Benchmark Monitoring:

## 3.2.3. Parameter Benchmark Monitoring

All facilities with sector-specific benchmark monitoring concentration values are required to conduct monitoring and sampling of storm water at each outfall as specified in Table 3, unless an exception applies (See Part 3.2.7). The benchmark concentrations are not effluent limitations; **a benchmark exceedance, therefore, is not a permit violation.**

**Benchmark monitoring data are to be used primarily by the facility staff to determine the overall effectiveness of BMPs and control measures in preventing or minimizing controlling the discharge of pollutants to the environment and to indicate when corrective action(s) may be necessary or possible alternative coverage by an individual or a different general permit.**



# Master General Permits: MSGP

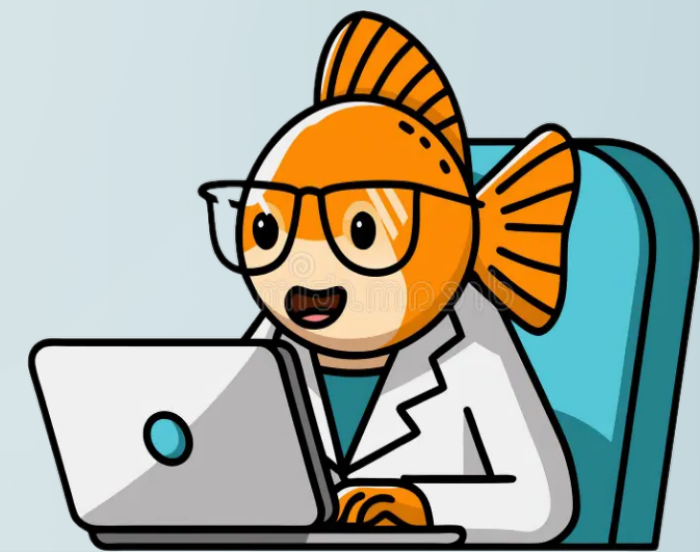
Numeric Limitations:

## 3.2.2. Numeric Limitations Based on Effluent Limitations Guidelines

Permittees subject to one of the Effluent Limitation Guidelines identified in Table 3 must conduct monitoring at all outfalls for each parameter on an annual basis (January 1 to December 31), for the entire term of the permit. Annual monitoring requirements will begin in the first full quarter after the facility's date of initial authorization or after notification of reauthorization by the LDEQ.

EPA's Industrial Storm Water  
Monitoring and Sampling Guide:

[https://www.epa.gov/sites/default/files/2015-11/documents/msgp\\_monitoring\\_guide.pdf](https://www.epa.gov/sites/default/files/2015-11/documents/msgp_monitoring_guide.pdf)



# Master General Permits: MSGP

## Visual Monitoring:

### 3.2.5.1 Visual Monitoring Procedures

Visual assessment must be made of a sample in a clean, clear glass or plastic container and examined in a well-lit area:

- On samples collected within the first 30 min of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 min of discharge, the sample must be collected as soon as practicable after the first 30 min, and the permittee must document why it was not possible to take samples within the first 30 min; and
- For storm events, on discharges that occur at least 72 hrs (3 days) from the previous discharge. The 72-hr (3-day) storm interval does not apply if it is documented that less than a 72-hour (3- day) interval is representative for local storm events during the sampling period.



# Master General Permits: MSGP

Visual Monitoring Continued:

## 3.2.5.1 Visual Monitoring Procedures

The sample must be visually inspected for the following water quality characteristics:

color, odor, clarity, floating solids, settled solids, suspended solids, foam, oil sheen, and other obvious indicators of storm water pollution.



Figure 17. Example of oil sheen.



# Master General Permits: MSGP

## Inactive and Unstaffed Sites:

The facility inspections and quarterly visual assessments do not apply at a facility that is inactive and unstaffed, as long as there are no industrial materials or activities exposed to storm water. To invoke this exception, a statement must be maintained in the SWPPP indicating that the site is inactive and unstaffed and that there are no industrial materials or activities exposed to precipitation in accordance with the substantive requirements in LAC 33:IX.2511.G.4.c. The statement must be signed and certified in accordance with Part 2.3. **If circumstances change and industrial materials or activities become exposed to storm water or the facility becomes active and/or staffed, this exception no longer applies and all applicable monitoring must be resumed immediately.**

Note: Inactive and unstaffed facilities covered under Sector J (Mineral Mining and Dressing) are not required to meet the “no industrial materials or activities exposed to storm water” standard to be eligible for this exception to the routine facility inspections and quarterly visual assessment.



# Master General Permits: MSGP

## Summary of Monitoring Deadlines:

**Table 5. DMR/Alternative Certification Deadlines**

Monitoring Class		Reporting Deadline (Postmark)
Effluent Limits Monitoring	Monitoring for Numeric Limitations (See Table 3.)	Submit results, including follow-up samples, by January 28 <sup>th</sup> for the preceding calendar year.
	Corrective Action Monitoring ( in accordance with Part 3.5)	Save and submit all results for year in one package by January 28 for the preceding year.
Benchmark Monitoring	Year 2 Monitoring (Year 2 monitoring runs from January 1, 2022 through December 31, 2022)	Save and submit all results for year in one package by January 28, 2023.
	Year 4 Monitoring (Year 4 monitoring runs from January 1, 2024 through December 31, 2024)	Save and submit all results for year in one package by January 28, 2025.
	Corrective Action Monitoring in accordance with Part 3.3	Save and submit all results for year in one package by January 28 for the preceding year.
Visual Monitoring		Retain results with SWPPP - do not submit unless requested to do so by the LDEQ.



# Master General Permits: MSGP

Table 3. Sector-Specific Benchmark Concentrations and Numeric Limitations  
Example – Sector E

SUB-SECTOR	PARAMETER <sup>10, 11</sup>	BENCHMARK <sup>12</sup>	EFFLUENT LIMITATION <sup>13</sup>
<b>Sector E: GLASS, CLAY, CEMENT, CONCRETE, AND GYPSUM PRODUCTS</b>			
Clay Product Manufacturers (SIC 3251-3259, 3261-3269)	Total Aluminum	1.1 mg/L	---
Concrete and Gypsum Product Manufacturers (SIC 3271-3275)	Total Suspended Solids (TSS)	100 mg/L	---
Cement Manufacturing Facility, Material Storage Runoff (40 CFR 411)	Total Suspended Solids (TSS)	---	50 mg/L, daily max
	pH	---	6.0 min - 9.0 max s.u.

<sup>10</sup> Metals benchmark values, which are designated as freshwater in parentheses, are hardness dependent metals; see Table 4.

<sup>11</sup> Marine water benchmark values for metals, designated as marine in parentheses, apply to storm water discharges into marine waters where indicated. Marine waters, as defined in LAC 33:IX.1105, are surface waters with average salinities greater than or equal to 10 ppt.

<sup>12</sup> Monitor once per quarter for the benchmark monitoring Years 2 and 4. (See Part 3.2.7.6 for possible Year 4 benchmark monitoring waiver.)

<sup>13</sup> Monitor annually, once per calendar year during each year of the permit term.



## Looking Ahead

- Light Commercial (LAG480000) and Dewatering of Petroleum Storage Tanks, Tank Beds, New Tanks & Excavations (LAG300000) – LDEQ will be reissuing these Final Master General Permits soon
- MSGP Renewal (current one expires October 26, 2026)
- LDEQ is developing electronic NOIs/forms





# Q&A

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