Facility Discharges to Surface Water and Groundwater – What Every Printer Should Know (and Must Do)

Is your business part of Standard Industrial Classification (SIC) code 27?

SIC Code 27 Printing, Publishing, and Allied Industries: This major group includes establishments engaged in printing by one or more common processes, such as letterpress; lithography (including offset), gravure, or screen; and those establishments which perform services for the printing trade, such as bookbinding and plate-making. This major group also includes establishments engaged in publishing newspapers, books, and periodicals, regardless of whether or not they do their own printing.

If you answered “Yes” and your business is located in Illinois, Indiana, or Wisconsin, you should be aware of regulatory requirements associated with water discharges to the storm sewer or to drainage ditches and other conveyance systems that ultimately discharge to surface waters or groundwater. The Clean Water Act of 1972 (the “Act”) is the prevailing federal rule designed to protect the waterways of the United States.

Like many federal rules, authority to regulate and enforce requirements of the Act is often delegated to the states. While there are some differences in how the Act is implemented in Illinois, Indiana and Wisconsin, the overall approach is similar.

Under the Act, there are several categories of activities and discharges that printers and printing-related operations are most likely to be affected by, which are summarized below.

Storm Water Discharges

Storm water discharges associated with industrial activity that discharge to waters of the state of Illinois, Indiana, and Wisconsin are required to obtain coverage pursuant to the National Pollutant Discharge Elimination System (NPDES) permitting program.

To facilitate compliance, a General NPDES Permit for Storm Water Associated with Industrial Activity (General Permit) was established by each state. The General Permit requires facilities to implement and maintain site-specific storm water control measures, and to develop storm water pollution prevention plans (SWPPP or SWP3) that are specific to the facility.

The General Permit specifies that Printing, Publishing, and Allied Industries included in SIC code 27 are among the facilities that are required to obtain coverage. Affected facilities obtain coverage under the General Permit by submitting a Notice of Intent (NOI) form to each of the respective state agencies (Illinois EPA, Indiana DEM and Wisconsin DNR).

Your facility may be eligible for a “No Exposure Certification” if you can demonstrate that your facility has no exposure of materials that could contaminate storm water. If you store materials outdoors, including but not limited to equipment, supplies, containers, pallets and other materials that have the potential to come into contact with storm water, chances are you will not be able to make a case for No Exposure Certification and will need to apply for a permit.

Please note that facilities that have an SIC code covered by the storm water rule and who make a claim of “no exposure” must complete and submit an initial No Exposure Certification and then again every time the general permit is renewed, which is typically every five years.

Blow Down


If “blow down” from any of these operations discharges to the storm sewer or to drainage ditches and other conveyance systems that ultimately discharge to surface waters or groundwater, and assuming the wastewater discharge has not come in contact with chemicals used in the process, then you must either: a) secure a “Non-contact Cooling Water” permit, or b) reroute the wastewater discharge to the sanitary sewer.
Some water treatment chemicals used to prevent biological growth (biocides), and those used to prevent scaling and corrosion are allowed when discharging blow down to the storm sewer or equivalent. But, there are exceptions. While many operations are eligible for coverage under their state’s general permit, an individual permit may be required depending on the type of water treatment chemicals you’re using.

Wastewater Discharge

Do you discharge wastewater that has come in contact with process chemicals? Is the discharge to the storm sewer or to drainage ditches and other conveyance systems that ultimately discharge to surface waters or groundwater? The discharge of this type is referred to as a “Point Source Discharge,” and you need an individual permit from the state and/or the local municipality.

Any discharge of pollutants into waters of the state as a point source discharge is prohibited unless it conforms with a valid NPDES permit obtained prior to the discharge. If you have a point source discharge, you may want to consider rerouting the discharge to the sanitary sewer and be aware of federal, state, and local municipal permitting requirements associated with industrial wastewater discharges to the sanitary sewer.

For more information and help with complying with the storm water or wastewater discharge regulations, register for the November 7 webinar sponsored by GLGA.

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