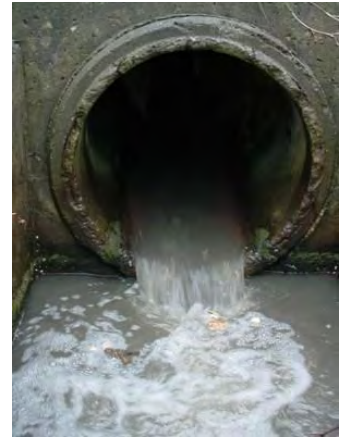


FINAL DRAFT

On July 19, 2013, the State Water Board released the final draft of the Industrial General Permit (IGP). You may remember, when the last draft was released, we commented on the common sense approach the State took in drafting the permit renewal. The direction has not changed in this latest draft. It appears that the State continued to listen to stakeholder input and made some additional common sense modifications. In this month's edition of the Rain Events we will look at the major changes ushered in by this latest version of the draft IGP, and what they mean for your facility.

“Simply simplified” seem to be the theme with a few of the modifications from the previous 2011 draft of the IGP. Training requirements have been simplified from the previous version. The previous draft introduced a new approved SWPPP writer / implementer called a Qualified Industrial Storm Water Practitioner (QISP), in which several levels of certifications were to be offered. This latest draft has only one type of QISP; and QISP training will not be required until response actions are triggered. This is huge relief for facilities as the previous draft required a QISP for each facility. If you are a facility that will be filing a No Exposure Certification (NEC), you will no longer be required to have a QISP to do so.

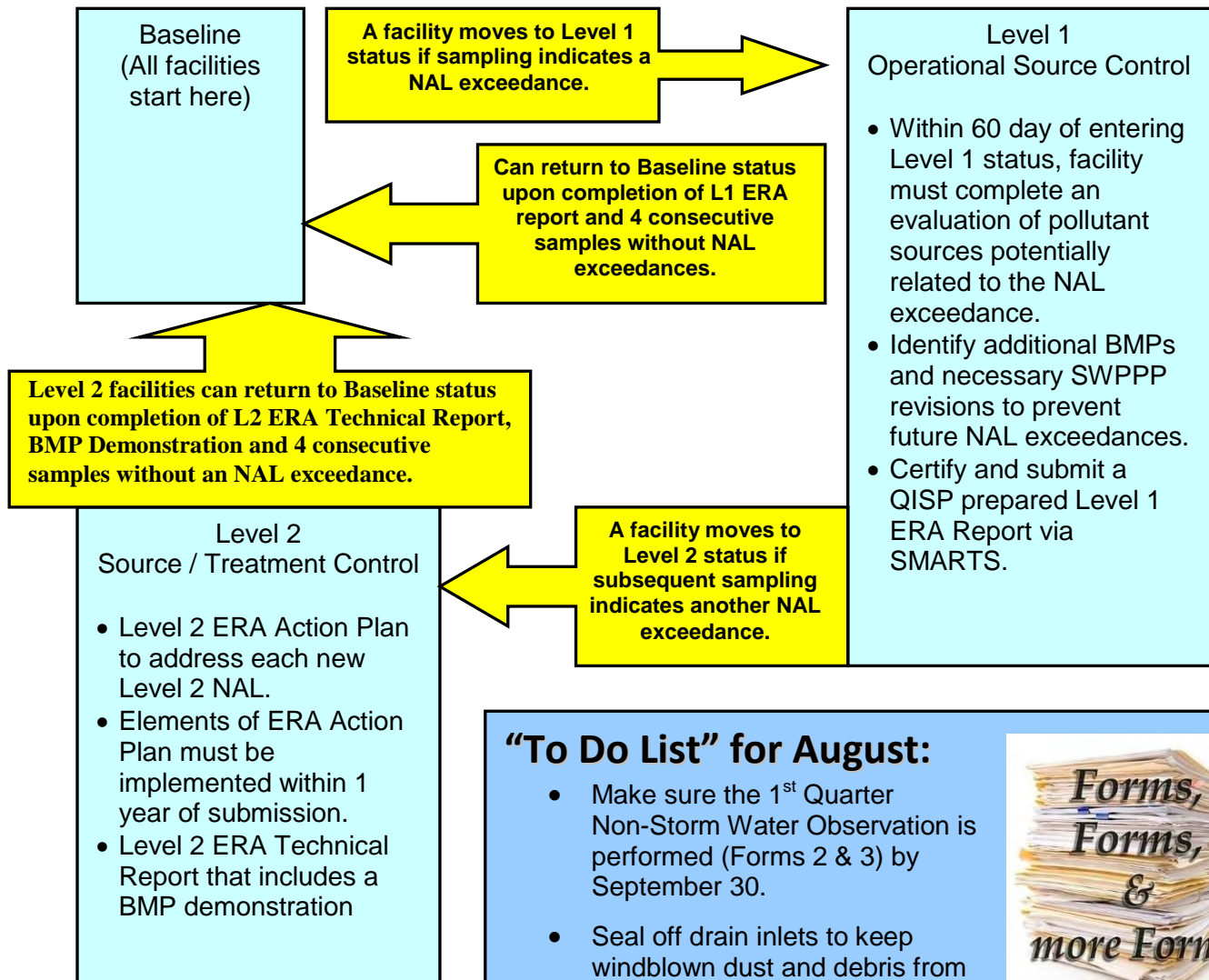


Monitoring requirements were also simplified. The previous draft required permittees to conduct pre-storm visual observations and quarterly authorized and unauthorized non-storm water discharge visual observations. The State has simplified these inspections into one monthly (non-storm event) visual observation of the facility's drainage areas. In addition, visual observations of storm water discharges will be required to be performed at the same time sampling occurs. This means sample event observations will only be required up to four times per year (2 samples during each half of the reporting year); which was modified from the previous eight times per year requirement. If the facility participates in a compliance group, monitoring is further reduced to 1 sample event during each half of the reporting year. We will discuss more on compliance monitoring groups later in this newsletter. The requirement for onsite rain gauges and measurement of rainfall has been removed. However, before returning that rain gauge; remember that even though rainfall readings are not required, a rain gauge can provide the guidance needed for determining when to sample. It may also help provide a defense against litigation groups claiming a discharge occurred at your facility based upon regional rain gauge readings.




Exceedance Response Actions (ERAs)

In a previous edition of the Rain Events, we discussed Exceedance Response Actions (ERAs) and discussed how the State has evolved this escalating corrective action mechanism to a baseline and two levels. The State continued to define the levels and associated corrective actions in this latest draft. So here's how it works...



“To Do List” for August:

- Make sure the 1st Quarter Non-Storm Water Observation is performed (Forms 2 & 3) by September 30.
- Seal off drain inlets to keep windblown dust and debris from entering them.
- Clean out drain pipes, manholes, and catch basins.
- Schedule annual storm water training (*check out the 2013 Storm Water Awareness Week workshops for free training that may qualify for your annual training*).



We Have a **July** Contest Winner!



Duane Hollander submitted the winning answer!

The question was...

What four storm water analyses are required of all IGP facilities?

The answer is...

- pH
- TSS
- Oil & Grease or TOC
- and Conductivity (No longer a required analysis in the latest draft permit!)

Duane wins \$25 at



Great job!

Compliance Groups

If this new permit is adopted as drafted, dischargers from the same or similar industries can join Compliance Groups. An example of this would be if you are a bulk petroleum terminal, then you would be allowed to join a group of other bulk petroleum terminals or similar facilities. Some of the advantages of becoming a Compliance Group Participant is the designated Compliance Group Leader will be taking care of the Consolidated Level 1 ERA reports for the group or Level 2 ERA Action Plans and/or Technical Reports specific to each participant with Level 2 status. In addition, group participants have a 50% reduction in the annual sampling requirements. Participants will only be required to collect one sample in the first half of the permit year and one in the second.

So, what's the catch? Here is the "fine print":

- The Compliance Group Leader must be a QISP.
- The Executive Director of the State Water Board may review Compliance Groups and activities for compliance with the General Permit and may reject Compliance Groups, Group Leaders, or Participants.

Important Dates for the Draft Permit

August 21, 2013 9:00 AM – Public Hearing in Sacramento (also broadcasted online)

August 29, 2013 12 Noon – Public comments due

January 1, 2015 – Anticipated effective date of the new permit.

For more information, go to http://www.swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml

Compliance Groups to form soon ...

Are you interested in possibly joining a Compliance Group for your industry sector? We are gauging interest and collecting contact information for the following industry groups:

- Bulk Petroleum Terminals
- Auto Dismantlers
- Trucking Companies
- Recyclers
- Light manufacturing
- Wineries
- Food processing plants

Please drop us a line if your facility would like to find out more.

Industrial General Permit Training Team (IGPTT)

The State Water Board has formed a training team to develop the content and process for the new IGP-required QISP certification. The IGPTT is comprised of representatives from industrial permittees, the State Water Board, Regional Water Quality Control Boards, the California Storm Water Quality Association, engineering firms, and consultants. The IGPTT had its first meeting on August 1, 2013 at the Sacramento CalEPA Building during which subcommittees were formed and a schedule for implementation was developed. It is the goal of the team to have the training ready to implement by November 1, 2014 prior to the anticipated permit effective date of January 1, 2015. One exciting development is that the IGPTT is looking at the possibility of leveraging technology to replace some of the live training and thus reduce some of the training burden placed on the business community. Look for updates on this group's activities and progress in future Rain Event editions.

August Storm Water Contest

Try it out! You can win!

By **September 9, 2013**, submit a response for the following question by email to steravskis@wgr-sw.com.



Question: The new IGP will require a facility to have 4 QSEs. What does the acronym QSE stand for and what is the definition of a QSE according to the draft permit?

All persons submitting the correct answer will be placed in a drawing. The winner will receive \$25 gift card to Applebee's.

Need your crew trained to take storm water samples, measure pH in the field, and do monthly observations?

WGR will come to your facility and provide a two-hour training session for **\$425**.

Appointments must be booked with aortiz@wgr-sw.com and facilities must be located within 50 miles of our Lodi or Los Alamitos offices. Discount pricing is also available for facilities farther than 50 miles, please contact Aaron Ortiz for more details. Offer does not apply to prepaid compliance programs.



Please contact us if you have any questions ...

Rain Events Newsletter Editor:

John Teravskis jteravskis@wgr-sw.com
(209) 334-5363 ext. 110

Technical Questions about Storm Water Compliance? Call ...

Aaron Ortiz, aortiz@wgr-sw.com, (209) 810-5151
Steve Teravskis, steravskis@wgr-sw.com, (209) 642-5020
John Ripley, jripley@wgr-sw.com, (310) 629-5259

SEPTEMBER 23-27

Coming to Locations throughout California

STORM WATER AWARENESS WEEK 2013

Storm Water Education should not be Big Business

- ⚡ Free storm water education
- ⚡ Workshops all over California
- ⚡ Topics of interest for construction, industrial, and municipal permittees; and for QSPs & QSDs.
- ⚡ PDU opportunities
- ⚡ Meet your facility's annual training requirements



WWW.STORMWATERAWARENESS.ORG

Need to protect your records?

Need a tool for managing records?

Tired of losing data?

Want to save time and money on inspections?

Effortless Record Keeping System

The QSP Pad™ is a revolutionary new service from **BMP Outlet** that provides a tool for storm water inspectors to accurately and easily create and keep track of field inspection records, and transmit them directly to the LRP or project managers at a *click* of a button.

- It uses the same forms you are already accustomed to using – but electronically!
- Each tablet comes pre-loaded with everything needed for QSP inspections.
- The QSP Pad™ tablet is also loaded with lots of useful references and tools for QSPs including a copy of the CGP, water quality references, a risk determination worksheet, a pH averaging tool, training documents, pre-programmed storm water website bookmarks, map and weather tools and apps, and many more features. We will even customize it for up to 3 of your projects.
- It improves inspector accuracy by stamping each form with the time and date of inspection.
- A built in app will allow inspection data to be stored safely on a cloud server until records can be transferred elsewhere.
- Completed inspection reports (embedded with site photos) can be emailed to multiple people with the touch of a button.



Each QSP Pad™ tablet has minimum specifications of 8 GBs RAM, built in camera, and 9-inch screen size, and utilizes an Android operating system.

Get your custom-loaded QSP Pad™ for only \$585.00*

* Not including tax & shipping. The forms app comes with a free 30-day trial and will require a license fee of \$0.50/completed report or \$20/month unlimited use for up to 3 users.

Please visit www.BMPOutlet.com to purchase yours today!