

# NEW YEAR'S RESOLUTIONS

## LOOKING AT LEVEL 1 ERA REPORTS

It's hard to believe, but it's that time of year when thoughts start turning to the approaching holidays – Thanksgiving is just around the corner, the department stores have already started advertising Christmas trees, and New Year's Day is only six weeks away. And we're quickly approaching the season when people start making New Year's resolutions – the well-intended and sometimes rash decisions to improve one's self, which usually only last for a couple weeks. But before January 1, 2017, the State Water Board will be expecting some industrial facilities to submit a New Year's resolution in the form of a Level 1 ERA Report – a summary of how your facility has corrected your storm water compliance problems, and how you plan to stay in compliance during the year ahead. In this month's edition of **The Rain Events**, we're going to take a look at what kind of resolution the State may be expecting from your facility this year.

Now, the State of California is only requiring a Level 1 ERA Report from those industrial facilities that had either Instantaneous or Annual NAL exceedances between July 1, 2015 and June 30, 2016. If your facility did not exceed any NAL values during that time period, take a deep breath of relief. However, you're not out the woods yet – make sure you keep your BMPs and pollution prevention strategies up to date, and try hard to keep your sample results below those NAL values. But if your facility did have one or more Instantaneous or Annual NAL exceedances, there's going to be a few things that need to happen.

By this time, you should have either trained or contracted with a Qualified Industrial Stormwater Practitioner (QISP) who, by October 1<sup>st</sup> of this year, will have performed a Level 1 ERA Evaluation of your facility and assisted you in identifying pollutant sources and any necessary BMP revisions. If you have not yet done this, you are behind in the process.

According to Section XII.C.2.i in the Permit, the first thing required for submitting a Level 1 ERA Report is to revise your facility's SWPPP and implement any new BMPs that were identified in the Level 1 Evaluation. Based on how the Industrial General Permit is written, it appears the State Water Board cares more about actions than words. Think about the Level 1 ERA Report not as a document that merely outlines what your facility is going to do differently, but as a document that summarizes what

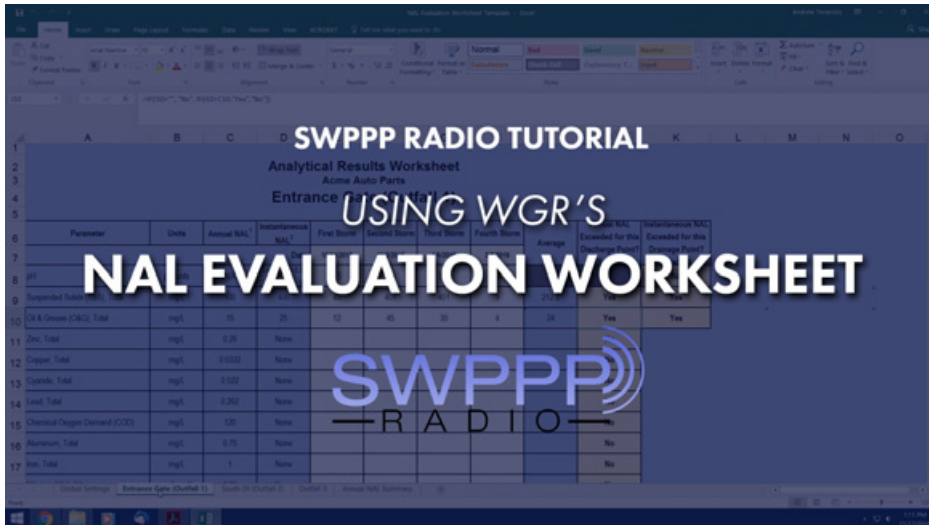
your facility has already done to correct the NAL exceedances. When you certify and submit this document on SMARTS, most if not all of the BMPs mentioned in the Report should already be in place and in working order.

Of course, this is a State Water Board regulation, so there is a deadline involved. The Industrial General Permit says that the SWPPP revisions, BMP implementations, and Level 1 ERA Report are due as soon as practicable but not later than January 1, 2017. If the new BMPs succeed in getting your facility below the NAL levels, then next year your facility will return back to Baseline status.

However, here's one last word of warning. If you think the Level 1 requirements are harsh, you will not want to see the requirements for Level 2 dischargers. If you want to save your company a large amount of money, our staff at **The Rain Events** would strongly encourage you to take these Level 1 requirements seriously. Do everything possible to keep your analytical results below the NALs, because once your facility enters Level 2 status, things will start becoming tough (and expensive, too). ☔

## New and Improved NAL Spreadsheet

A while back, we gave out one of our tracking tools for evaluating analytical results. Now for this year's storm season, we've made some major updates and improvements. Plug your sample results into this Excel-based spreadsheet, and watch it go to work. The spreadsheet will automatically calculate averages and inform you if you have Instantaneous or Annual NAL exceedances. We've attached the spreadsheet to this PDF, so look on the left for a paper clip icon to open the attachment, and watch the brief how-to video below.



<https://www.youtube.com/watch?v=fJnLdKjbnQI>

## SWPPP Radio with Rebecca Greenwood

For this month's newsletter, we travelled up to the State Water Resources Control Board to interview Rebecca Greenwood about what the Water Board is expecting from dischargers concerning the Level 1 ERA Report. Listen below!



## Rebecca Greenwood on Level 1 ERA Reports

<http://swpppradio.org/listen.php?ID=15>

Need help with your facility's Level 1 Evaluation and Report?  
Give us a call at (209) 334-5363, ext. 114

## "To Do List" for November:

- ☁ Perform the November monthly inspection
- ☁ Obtain a storm water sample from each drainage area
- ☁ Your Level 1 Evaluation should be complete, so start working with your QISP to prepare the Technical Report (due on Jan. 1, 2017).

## QISP Training Class December 13, 2016 (8:00 AM – 4:30 PM)

WGR Southwest, Inc.  
11780 N. Hwy 99, Lodi, CA 95240

The class will be taught by IGP Trainers of Record John Teravskis and Aaron Ortiz, and will be held in the same studio used to record the online QISP training videos. In order to take this one-day training class, each QISP candidate will need to register for and complete the State-approved online QISP training course from CASQA. To take this course, visit the QISP page on CASQA's website:

<https://www.casqa.org/resources/qisp-qualification>

Register online to reserve your place.

Go to:

[www.gotswppp.com/QISP](http://www.gotswppp.com/QISP)

Please contact us if you have any questions ...

### The Rain Events

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## Storm Water Contest...

Each month, we invite our readers to participate in a contest to test their knowledge of the Industrial General Permit and their storm water compliance program. We enter all submittals to our monthly newsletter question into a drawing, and one person is selected at random to receive a \$25 gift card. Last month's question was:

**It's raining, but when you go out to sample, there is heavy forklift traffic around the discharge location. Does the Permit allow an exception for this safety hazard?**

Edward Flores got it right! **No, the Permit only allows exceptions for 1) dangerous weather conditions, and 2) outside scheduled facility operating hours.** If there's heavy forklift traffic, take some cones and have them go around you while you're sampling. Having a second person spot you may not be a bad idea either.

Edward wins \$25 to Macaroni Grill for some Chicken Scaloppine!

## This Month's Contest Question:

### What constitutes an Instantaneous NAL exceedance?

By December 9, 2016, submit your response to the above question by sending an email to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift cart to Claim Jumper.



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# thankful.

The Rain Events staff wishes to thank all of our readers for trusting us to answer your compliance questions! Have a great Thanksgiving, and don't forget to thank God for the rain we've already received!