



your facility's
FUTURE PLANS START NOW

The data's in and it's time to plan ahead for the next compliance year.

Do you like to know where you're going in advance, rather than just flying by the seat of your pants? If that's you, then right now is a good time to start looking towards the future of your industrial storm water compliance program. Do you know what's going to be required of you in the upcoming new storm water year? Is your facility advancing to another NAL exceedance level for a pollutant? Or did the results from your last storm water year bring you back down from an upper level? If so, congratulations! If not, better start thinking about what's coming. And we're here to help you with that! In this month's edition of **The Rain Events**, we're going to be discussing how to prepare for the future of your facility's storm water program.

By now, you have most likely been able to collect all of the 4 samples you needed for this current compliance year. Hopefully, if you're still waiting for one more sample, you are evaluating the data from the previous samples to see what direction your facility is heading next. In this flux time of the end of sampling and the end of the compliance year, is a good time to do an end of year analysis of what Exceedance Response Action Level your facility will be heading towards – staying in the level you are, dropping to a lower level, or advancing to an upper level. If you are at Baseline, you just need to be doing good O&M procedures. If you are at higher levels a little more is involved. If you are at Level 1 it means you had an NAL/TNAL exceedance for a certain parameter you were sampling for. An entry into Level 1 triggers the need for a Level 1 ERA Evaluation – a QISP conducted assessment of industrial pollutant sources at your facility that could have caused or contributed to the exceedance. This assessment will help determine what BMPs

will be implemented at your facility to help control that pollutant. By January 1st of the reporting year the discharger will be required to revise their SWPPP to show the BMPs implemented due to the assessment as well as certify and submit the Level 1 ERA Report that their QISP prepared. According to the Permit, “A Discharger's Level 1 status for a parameter will return to Baseline status once a Level 1 ERA report has been completed, all identified additional BMPs have been implemented, and results from four (4) consecutive QSEs that were sampled subsequent to BMP implementation indicate no additional NAL/TNAL exceedances for that parameter.” However, if the sampling results indicate continued exceedances for that same parameter after the transition to Level 1, the facility shall advance to Level 2 for that parameter. *Keep in mind that you can be at different levels for different parameters.* Upon the commencement of Level 2 status, the discharger must certify and submit a Level 2 ERA Action Plan that is

created by a QISP that addresses the Level 2 exceedance and the demonstration(s) the discharger selected to implement, as well as the schedule of tasks to be completed to comply with the Level 2 Action Plan. If you are advancing into the Level 2 status, then you will have one or more demonstrations to choose from to help explain or prevent and control further pollution from occurring. These demonstrations include an Industrial Activity BMPs Demonstration, Non-Industrial Pollutant Source Demonstration, and a Natural Background Pollutant Source Demonstration. While you may not need to do these demonstrations for Level 1, valuable lessons for controlling and preventing further exceedances can be drawn from them (*see the Permit for the full details on these*). All three of these demonstrations include an assessment of pollutants on site –pollutants directly or indirectly related to industrial activities, or a natural background pollutant; an evaluation of what BMPs would be best suited for that scenario, and an action plan of how to

implement it.

But what if you are one sample away and close enough to a parameter that allows you to stay in the same level or drop to a lower level if you were to implement BMPs or practices to reduce the pollutant of concern in your samples? Take a look at those sample results and assess your current exceedance status and put into place some BMPs which might help keep that last sample from tipping the scale into an exceedance. However, even if your facility collected all four samples, you should still take a look at the results to see if there are any instantaneous or annual Numeric Action Level (NAL) exceedances. Remember annual NALs are averages for the entire facility for all samples collected at all outfalls. If the average for any parameter is just barely over the annual NAL, it might be wise to consider collecting and testing additional samples after implementing additional BMPs to see if you can get the average to drop below the NAL. This data will affect the July 1 outcome. Do what you can now to influence the direction of your compliance program.

If you're advancing a level, you need to get a QISP involved. So, what exactly does a QISP do? A QISP is a Qualified Industrial SWPPP Practitioner and they have ten specific tasks that they are given to do for dischargers who are in Level 1 or Level 2 status:

1. May represent one or more facilities but must be able to perform the functions required by the IGP at all times.
2. Assigned to a facility that reaches Level 1 status (and Level 2)
3. More accurately identify discharge locations representative of the facility storm water discharge
4. Select and implement appropriate sampling procedures
5. Evaluate and develop additional BMPs to reduce or prevent pollutants in industrial storm water discharges
6. Assist with the completion of the Level 1 Evaluation and preparation of the Level 1 ERA Report
7. Assist with the completion of the Level 2 ERA requirements and the preparation of the Level 2 Action Plan & Level 2 Technical Reports



8. Assist new dischargers in preparing the SWPPP and monitoring program

9. Provide training to “appropriate team members” for Level 1 facilities.

10. Be informed, responsible, and attentive to the required duties of a QISP; keeping the QISP certification in good standing with the State Water Board and CASQA

Now is also a really good time to start looking into what treatment options would be the most cost effective as well as result producing for your facility in the upcoming year. Look into some of the bigger treatment options which might have better results for your dollar – ponds, vegetated swales, end of line treatment devices, and phytoremediation treatment systems ([check out this phytoremediation system](#)). Your treatment options are wide in range and applicability as well as price tag, so use this time to talk with your QISP and narrow down your treatment preferences so that you know what would work best for your facility's specific needs. Capturing and infiltrating the storm water that's on your facility is the best way to handle it if feasible for your space. Especially if you can create a pond or basin that will keep your facility from discharging. If you don't have a pond, do you have space to create one on the premise or reroute your runoff to an adjacent property your facility owns which can accommodate a pond? According to the IGP, storm water containment and discharge reduction BMPs include, “BMPs that divert, infiltrate, reuse, contain, retain, or reduce the volume of storm water runoff. Dischargers are encouraged to utilize BMPs that infiltrate or

reuse storm water where feasible.” Think ponds, retention basins, culverts, etc. And while these advanced BMPs aren't necessarily required for your facility, the Water Board recommends and encourages using them.

By nature, storm water containment and discharge reduction BMPs help capture storm water and during typical wet seasons, prevent a discharge from occurring or reduce the overall number of discharges. Often, the initial discharge from a storm event will have the highest concentration of pollutants. So, by installing containment and discharge reduction BMPs (even if your containment can only capture and contain the smallest storms) it can help prevent NAL exceedances, reduce the number of discharges your facility has, and save you storm water analytical costs.

Don't forget about vegetated swales that can capture and infiltrate water! Plants are a very effective, natural, and usually cost effective treatment source, since certain plants consume pollutants which could be problematic for your facility – things like nitrites/nitrates, nutrients, and metals. It's time to start planning ahead for your next storm water year and putting into place measures which will ensure clean storm water.

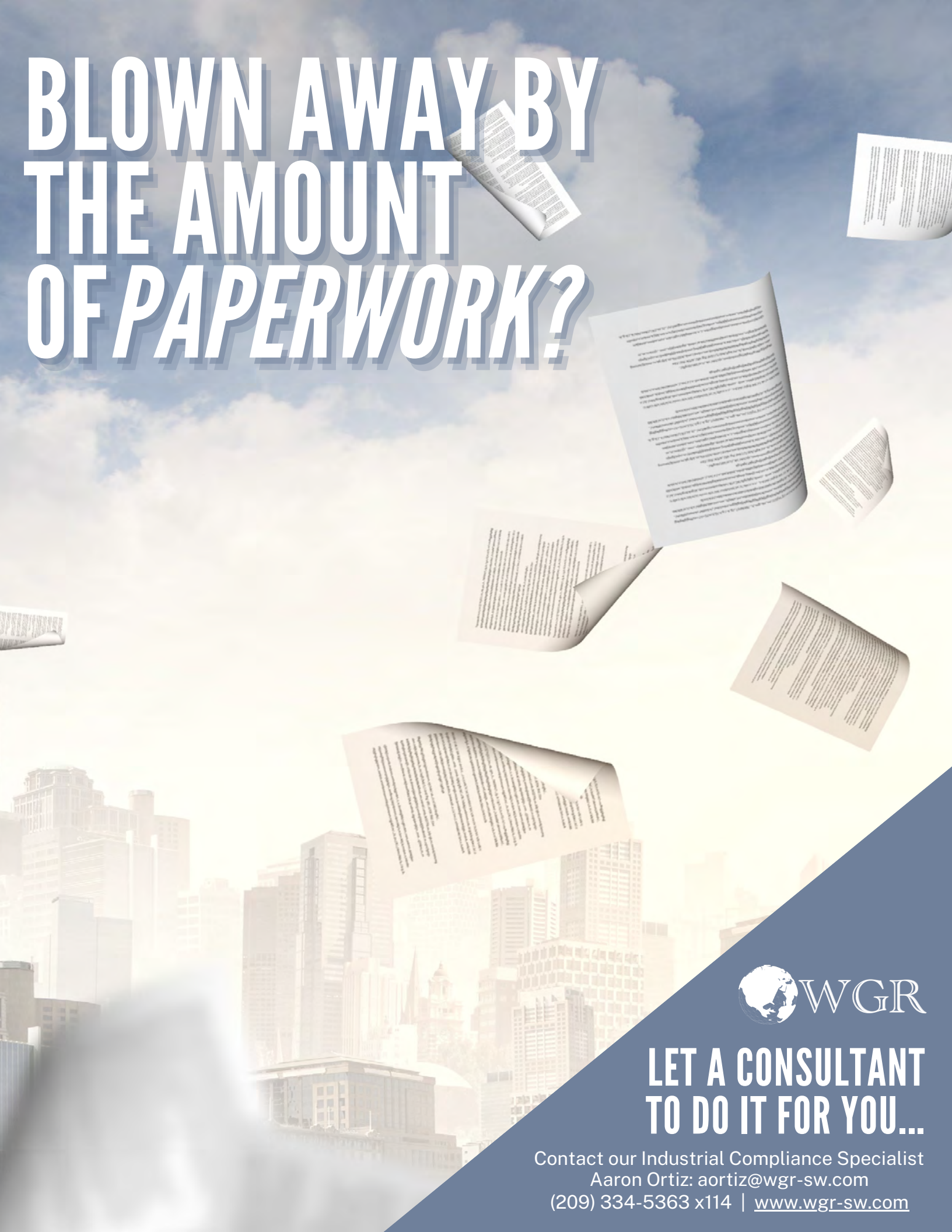
The Rain Events

Lead Editor: John Teravskis
QSD/QSP, QISP, CPESC, ToR, IGPTT Participant
jteravskis@wgr-sw.com
(209) 334-5363 ext. 110 or (209) 649-0877

Supporting Editors:

Aaron Ortiz, QISP, ToR, aortiz@wgr-sw.com
(209) 334-5363 ext. 114
Rebekah Teravskis, rteravskis@wgr-sw.com
(209) 334-5363 ext. 118

BLOWN AWAY BY THE AMOUNT OF *PAPERWORK?*



**LET A CONSULTANT
TO DO IT FOR YOU...**

Contact our Industrial Compliance Specialist
Aaron Ortiz: aortiz@wgr-sw.com
(209) 334-5363 x114 | www.wgr-sw.com

FORGE

POLISH YOUR
INDUSTRIAL

• SWPPP WRITING •

wgr-sw.com/training

Storm Water Contest...

Each month, we invite our readers to participate in a contest to test their knowledge of the Industrial General Permit and show 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 contest question was:

What are three reasons NOT to sample at your industrial facility?

Congratulations to Melissa who replied "Flooding, falling trees, and downed power lines." Those would fall under the safety clause of sampling, so that is definitely one of the reasons why you shouldn't sample at your site. Melissa, we hope you enjoy your next Amazon shopping trip!

...This Month's Contest

Can you be at different ERA Levels for different parameters?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, May 5th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a \$25 gift card to Outback Steak House.

GET SOCIAL:



WWW.WGR-SW.COM

WANT TO STRENGTHEN YOUR CRAFT? CHECK OUT [FORGE](#) - AN ONLINE LEARNING PLATFORM.