

ANNUAL REPORT SEASON REVIEW

An Interview with WGR's Industrial Team

How did the overall annual report process go? What were challenges you had this year?

It went very well! Across the 82 annual evaluations and 70 annual reports we completed for our clients, things went pretty smoothly. However, a big challenge we ran across were facilities having a change of ownership because of being bought out. We had 8-9 clients this year who got bought out and didn't notify us of the transition. This made the reporting process difficult because their company information had already been updated (in some cases, for months prior to the annual report process starting). The contact information – or even the LRP themselves – had been updated and replaced, while the SWPPP and SMARTS information hadn't been updated to match, which meant that certified reports weren't completed in a timely manner, and the team often wasn't able to access their account due to the changes which weren't processed with the Water Board in advance. If you are transitioning leadership or ownership, you need to make sure you are following all the required steps. NPDES Permits are not transferrable and will require an NOI by the new owner and an NOI by the old owner. There are a lot of facilities who overlooked their whole storm water program during the transition because it's not "important". According to the Water Board, you are required to have your storm water program updated and ready to go 7 days prior to the change of ownership. A lot of

The Industrial General Permit's annual reporting deadline has come and gone, and now that our team here at WGR has time to breathe again, we interviewed them for this month's edition of **The Rain Events** newsletter to hear how the 2026 Annual Report season went, and to hear feedback which you, as an industrial facility, can incorporate into your storm water program for next year. If it's news to you that there was a deadline for your facility's storm water annual report, reach out to our team and find out what you should do now that the deadline has passed. But without further ado, let's hear from Aaron and Gabby about how the 2026 annual reporting period went.

facilities do it months, if not even a year, later. In our experience, we rarely see this transition process happen correctly. We highly recommend notifying your consultant as soon as possible so they can get the process started way ahead of the handoff. Another challenge we came across was that a couple of clients, when they scheduled their annual reports, did not realize an annual evaluation had to come first. One client only signed off on the annual report and didn't realize there was an annual evaluation needed first and asked WGR to take care of that just 2 weeks before the deadline – which was a very tight schedule considering all the other clients we were assisting. The biggest take away for a facility is annual reports don't stand alone; you have to have an annual evaluation completed first. For us as consultants, getting ready for annual evaluations and annual reports started at the beginning of the calendar year before our clients even reached out. We make sure we have our list of clients – starting with clients who likely never discharge (based on history of typically not having any Ad Hoc). And usually, our clients reach out to us once they get a letter from the Water Board saying their annual report is due on July 15. Our biggest tip for an industrial facility is to reach out to your consultant before mid-June or get on their calendar a lot sooner. Facilities who have ponds which don't discharge, should aim to have their annual evaluations done as early as April. We have a

client who has massive ponds and they haven't discharged in years. Facilities with ponds who know whether they have discharged or not, should be the first to reach out to get the annual evaluation and reporting process done. Overall, we try to reach out to all our clients to give them notice of the impending deadline and to help them schedule out the annual evaluation and reporting process. However, some clients don't realize the responsibility for their storm water program is ultimately on them and not on their consultant. We provide the services and guidance and will help fill out reports, but the legally responsible person (LRP) or duly authorized representative (DAR) will need to certify and approve all of their storm water reports, Ad Hoc, etc. Having a facility's LRP/DAR engaged in their storm water program is crucial for making sure the storm water program of the facility runs smoothly. The good news is an LRP/DAR doesn't need to know every detail of the Permit program to be engaged. Reach out to your consultant. It is literally their job to help you. Consultants notify and give guidance to LRPs/DARs, however, only the LRP/DAR can certify reports. We, as consultants, are not allowed to do this step for our clients.

What do you look for on an annual evaluation visit? Annual inspections are meant to identify and evaluate BMPs and compare actual conditions to what is specified in the SWPPP. Primarily what we look for during an annual evaluation is site cleanliness.



We're looking to see if you are cleaning up your spills. Obviously, there might be some residual staining, but can we see evidence of what spilled still at the scene of the spill? Basically, we want to see that you are taking note of what is happening on site and are aware of accidents, or other situations. When we show up for the annual evaluation, we want to see that you have been and are currently staying on top of your basic good housekeeping. During the annual evaluation we also take a look at your monthly inspections. And while it might go without saying, you'd be surprised at how many facilities don't realize that monthly inspections need to be done monthly. We've come across numerous half-done inspections, pencil whipped inspections, or "monthly" inspections that we've heard being filled out in the other room before being handed to us minutes later. Make sure your paperwork and monthly inspection records are gathered and ready for your consultant. Another thing we are looking for during the evaluation is for any new changes that we need to be aware of. We can't tell the number of times we've shown up to a facility and asked them if they have any new processes, areas, or changes to their BMPs, and are told that "no, everything is the same!" Then we do the site walk and find out they have a new building and a new machine or a new outfall. As an industrial facility, think ahead of the new developments which happened at the facility since the last reporting year, so that when your consultant shows up to do the annual evaluation, you can point out those new areas and walk your consultant through the new updates since they have to add it to your SWPPP.

How was the sampling season this year? In our experience, it was a mixed bag if our clients collected their 4 required samples or not. For a lot of our clients, the rain would come in overnight and stop before operating hours the next morning. They only got 1 sample, and for some, no samples during the first half of the reporting year and but captured 2 samples in the second half of the reporting year. Others got 2 samples the first half – but it's our suspicion that they got too eager and collected

samples too early or before the water was flowing enough to collect a sample without scraping or gouging. Or they just happened to be in a spot where a cloudburst caught them, and they were able to collect samples. But for the

majority of our clients, the rain happened either overnight or over the weekend, and it was challenging for them to collect their required qualifying samples. Something we noticed while doing annual reports is that if you have samples, you need to submit them on SMARTS as Ad Hocs within 30 days of receiving the results. We noticed numerous clients received their sample results months ago, but when we showed up to do their annual report in June, they still hadn't submitted those results, so we had to help them process the Ad Hocs first, before we could process their annual report. On top of that, we had rain in May, and while we were doing annual evaluations we found we were still waiting for lab results for some facilities. **Tip:** when you grab samples, as soon as you get the results back, you need to check results and make sure they have all the information included. One of the things that SMARTS requires you to include in the Ad Hoc is the Method Detection Limit (MDL). We had a hard time getting the MDLs from a specific lab for the samples they processed. You will need to double-check that the MDLs are listed on your report and if they are missing contact the lab and have them reissue the report because it's a very common problem.

Annual Report Tips: The lead up is most important. If the lead up to the annual report is done right, walking through the annual report is a lot easier and a lot faster. Be prepared to be able to prove your drainage status from your facility – especially if you have no discharges. Make sure you have documentation with all the specs and descriptions to include on your annual report as back up documentation of why you didn't have discharges to prevent third parties from accusing you of falsifying your storm water reports. Be detailed in your explanations. This year, the Water Board expanded the annual report with extra categories for you to check off why there was no discharge. We really liked this new update since it helped facilities provide better explanations of why they had no discharge. **Pro tip:** during the reporting year, make notes and observations of storm

events that weren't qualifying and keep a record of non-storm water events. If you are waiting for a storm event and doing your job as a storm water professional, but no storm happens, make a note. Having a paper trail in regards to storm events is very helpful.

Oversights: A lack of good housekeeping is hands down the biggest oversight we see at facilities. In a nutshell, sweeping and cleaning should be done regularly. Clean up spills and drips. Don't let things sit. The whole idea of the Permit is to do things immediately. Yes, there are messy processes, but if it's being cleaned up at the end of each day, that's different. BMPs left to sit and rot, drains that haven't been cleaned out, debris piled up everywhere are the problem. BMPs which are worn at the end of the year are one thing, but BMPs that are worn because they haven't been changed for several years is another. Good housekeeping is about keeping it as clean as you can. We're not looking for pristine, but we are looking for clean. A lot of facilities are just messy and don't keep the place clean – don't be like that! Sweep and clean on a regular basis! Vacuum sweeping trucks only work so well. They're good to cover vast paved areas, but to be effective, you should follow up with hand sweeping. Maybe not everywhere, but definitely the areas the sweeping truck can't reach. Go through your site and try to do a more thorough cleaning throughout the month instead of saving it up or never getting around to it. Paperwork is the second biggest oversight. We talked about this previously, so we won't go into it again, but have your paperwork completed and ready to go. There's also a big missing Permit requirement when it comes to training. Quite a few facilities only have 1-2 people trained, and a lot of times if one of those people leave the company, all the storm water program load is place on one person who barely knows what they are doing, or the new hire who has no idea what they are doing. This creates gaps in the storm water program. This is especially a problem when someone leaves unexpectedly. Cross training is important. You need more than one person who knows how to sample and run the storm water program. Plus your staff needs to really understand what they are doing and be trained in order to be valuable storm water team members.

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 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.

Send us a historic mud/dirt/erosion story or fact that we didn't share in this newsletter!

Congratulations to Matt who answered, “*Malakoff Diggins, the power of water to wash away mountains.*” We hope you enjoy your next shopping trip at Bass Pro! And we hope some of our readers will be able to go explore this historical park for yourself!

...This Month's Contest

When should you submit your storm water sample results on SMARTS?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, October 9th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a \$25 gift card to Amazon.

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