

## HAVE YOU COMPLETED YOUR MONTHLY FACILITY CHECKUP

### *It's time for your facility's monthly checkup.*

According to the Industrial General Permit, industrial facilities need monthly checkups (in the form of inspections/visual observations) to make sure everything is staying on track. Is your facility staying on top of its monthly visual observations? Is everything running smoothly and storm water quality being protected, or are there definite areas with need for improvement? These monthly inspections are important, mandatory, and very telling of your compliance plan effectiveness. They're also preventative and will help you avoid exceedances or unauthorized non-storm water discharges. In this month's edition of **The Rain Events**, we will be tackling the necessary observations needed to complete each monthly visual inspection, as well as providing you with an inspection form template, compliments of The Rain Events!

The requirement for monthly visual observations can be found in Section XI.A.1 of the Industrial General Permit – which clearly states that *“At least once per calendar month, the Discharger shall visually observe each drainage area.”* If you're not sure about where every drainage area is on your site, you're going to need to familiarize yourself with the SWPPP map of your facility or talk with your QISP. Subsection XI.A.1.b gives a few more details, stating that these observations “shall be conducted during daylight hours of scheduled facility operating hours and on days without precipitation.” Given this information, it is important to note a couple things – first, these monthly inspections are not sampling events. The purpose of these inspections is to determine if there are any non-storm water discharges (NSWDs) occurring at the facility, or if any industrial materials or practices are, or potentially could cause, a pollution problem. Secondly, the inspections are to be performed during normal business hours. Performing them

during normal industrial activity helps to ensure that your observations accurately reflect what is happening at your site. Waiting until the end of the business day, when most people have already ceased their activities and are heading home or doing it first thing in the morning before work begins, wouldn't be representative times for your facility's monthly inspection. The same applies for abnormal activities that just happen to be going on during the time you do your monthly inspection (however, be sure that during these rare occasions storm water compliance is continued). Pick a day and time that will be sure to have activity happening which is normal for your facility. Before you head out to do your monthly inspection, let's discuss what exactly you should be looking for. The Permit lists three things to be on the lookout for: First, look for “indications of prior, current, or potential **unauthorized** NSWDs and their sources.” What is an unauthorized NSWD? Simply put, it is anything that

doesn't appear on the list of authorized non-storm water discharges found in Section IV of the Permit – “The following NSWDs are authorized provided they meet the conditions of Section IV.B:

1. *Fire-hydrant and fire prevention or response system flushing;*
2. *Potable water sources including potable water related to the operation, maintenance, or testing of potable water systems;*
3. *Drinking fountain water and atmospheric condensate including refrigeration, air conditioning, and compressor condensate;*
4. *Irrigation drainage and landscape watering provided all pesticides, herbicides and fertilizers have been applied in accordance with the manufacturer's label;*
5. *Uncontaminated natural springs, groundwater, foundation drainage, footing drainage;*
6. *Seawater infiltration where the seawater is discharged back into the*

source: and,

7. Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of your facility, but not intentional discharges from the cooling tower (e.g., “piped” cooling tower blowdown or drains).

IV.B. The NSWDs identified in Section IV.A are authorized by this General Permit if the following conditions are met:

1. The authorized NSWDs are not in violation of any Regional Water Board Water Quality Control Plans (Basin Plans) or other requirements, or statewide water quality control plans or policies requirement;

2. The authorized NSWDs are not in violation of any municipal agency ordinance or requirements;

3. BMPs are included in the SWPPP and implemented to:

a. Reduce or prevent the contact of authorized NSWDs with materials or equipment that are potential sources of pollutants;

b. Reduce, to the extent practicable, the flow or volume of authorized NSWDs;

c. Ensure that authorized NSWDs do not contain quantities of pollutants that cause or contribute to an exceedance of a water quality standards; and,

d. Reduce or prevent discharges of pollutants in authorized NSWDs in a manner that reflects best industry practice considering technological availability and economic practicability and achievability.

4. The Discharger conducts monthly visual observations (Section XI.A.1) of NSWDs and sources to ensure adequate BMP implementation and effectiveness; and,

5. The Discharger reports and describes all authorized NSWDs in the Annual Report.”

In addition to looking for current non-storm water flows, you will also need to look for indicators of past flows and keep an eye out for situations which could potentially cause a non-storm water discharge. Secondly, you’re going to need to look for “Authorized NSWDs, sources, and associated BMPs to ensure compliance with Section IV.B.3 [of the Permit].” Again, only if it appears on the list in Section IV of the

Permit can it be classified as an “authorized non-storm water discharge.” If you see what you think is an authorized non-storm water discharge, check and make sure it is and that the BMPs are in place and effective. If you see an unauthorized

non-storm water discharge, don’t just dismiss it and walk on, take action and prevent the discharge – cover drains, use a spill kit, or if possible, re-route the discharge path to a sanitary sewer. Section IV.B.3 has a list of BMPs which should be reviewed to see what BMPs should be implemented during each authorized non-storm water discharge. Third, look for “Outdoor industrial equipment and storage areas, outdoor industrial activities areas, BMPs, and all other potential source of industrial pollutants.” Basically, be on the lookout for situations which could cause an unauthorized NSWSD or contaminate storm water runoff.

Once the inspection is finished, there is still work to be done. According to Section XI.A.3 of the Permit, you will need to record the date and approximate time of your inspection, the locations observed, the presence and probable source of any observed pollutants, the name of the inspector, and any response actions or needed SWPPP revisions. This is quite a bit of information – so in order to make the inspection process a little easier, it’s a good idea to create an intuitive form that can be filled out during the actual inspection. Not only is this a whole lot simpler; it also ensures that the inspector doesn’t forget any important information. You can create your own form using Google Sheets that can be shared by all the inspectors and easily accessible from an iphone or laptop, or use a template.

Check out this monthly inspection

Form 2  
Monthly Visual Observations

Please complete this form monthly. The Discharger shall know / observe each discharge area for the following: 1) the presence or absence of unauthorized NSWSDs, their sources, and BMPs to address them, and 2) outdoor industrial equipment and storage areas, outdoor activities, BMPs, and all other potential sources of industrial pollutants.

Facility Name: \_\_\_\_\_  
Month and Year: \_\_\_\_\_  
Name of the observer: \_\_\_\_\_  
Scheduled facility operating hours: \_\_\_\_\_  
Date and time of the observation: \_\_\_\_ / \_\_\_\_ / \_\_\_\_ : \_\_\_\_ AM / PM. Must be performed during daylight and during normal scheduled facility operating hours.

Outfall Observations for NSWSDs:

Notice: If the remaining sections of this page (page 4 of 7) only if NSWSDs were observed or else leave blank and move onto page 2 of 2.

| Outfall Name(s) | Is there a NSWSD or indication of a recent NSWSD? (Yes / No) | If yes, answer the following:<br>Is it unauthorized? Is it authorized? | Describe the source of the NSWSD | If it was unauthorized, was it discontinued? (Yes / No) | If it is authorized, describe the BMPs in place to ensure that it does not migrate or contain pollutants, or cause erosion |
|-----------------|--|--|----------------------------------|---|--|
|                 | YES / NO   |  |                                  | YES / NO  |  |
|                 | YES / NO   |  |                                  | YES / NO  |  |
|                 | YES / NO   |  |                                  | YES / NO  |  |
|                 | YES / NO   |  |                                  | YES / NO  |  |
|                 | YES / NO   |  |                                  | YES / NO  |  |
|                 | YES / NO   |  |                                  | YES / NO  |  |

Corrective Actions Needed for NSWSDs:  
Describe corrective actions needed to eliminate or control NSWSDs:

Corrective Actions Taken for NSWSDs:  
Describe the corrective actions that were taken as a result of the NSWSDs:

Form 2 - Page 1 of 2

Month: \_\_\_\_/\_\_\_\_/\_\_\_\_

template form we here at The Rain Events have put together for your convenience.

Visual observations are an important element of keeping your facility compliant and are not something that can be overlooked or classified as “I’ll get around to it when I can.” You will have to account for all your monthly observations in your facility’s Annual Report and will be required to give an explanation for any months that were missed. Because of this, it’s a great idea to set up a schedule for performing the monthly visual inspections, such as the first Monday of each month. Of course, the schedule may need to be changed slightly depending on weather conditions but try to stick as close as possible to the scheduled inspections. Also make sure that whoever is conducting the monthly inspection is well versed in what they need to look for and what the Permit requires (maybe send them this newsletter to review before their next scheduled inspection).

If you are looking for someone to come and inspect your facility, or at least get you going in the right direction, contact our supporting editor Aaron Ortiz for more information (contact information given below).

## The Rain Events

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# COMPLIANCE

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purchase BMPs  
doesn't have to be  
this complicated...





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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.

*What BMPs will help reduce the likelihood of third-party lawsuits?*

Congratulations to Sandy who answered, “Documenting & keeping photos to prove you don’t have to sample since they didn’t discharge during business hours is a BMP that is important in avoiding threatened lawsuits.” We hope you enjoy your next shopping trip on Amazon!

## *...This Month's Contest*

*When you do your monthly inspection, what three things should you be looking for?*

We need industrial storm water sleuths to help us with this month’s question. Submit your answers by Friday, August 8th. Email your answer to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). One winner will be selected by a random drawing to receive a \$25 gift card to Starbucks.

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## Form 2 Monthly Visual Observations

At least once per calendar month, the Discharger shall visually observe each drainage area for the following: 1) the presence or indications of unauthorized NSWDS and their sources; 2) authorized NSWDS, their sources, and BMPs to address them; and 3) outdoor industrial equipment and storage areas, industrial activities, BMPs, and all other potential sources of industrial pollutants.

|                                     |       |   |         |
|-------------------------------------|-------|---|---------|
| Facility Name:                      |       |   |         |
| Month and Year:                     |       |   |         |
| Name of the observer:               |       |   |         |
| Scheduled facility operating hours: |       |   |         |
| Date and time of the observation:   | /   / | : | AM / PM |

*Must be performed during daylight and during normal scheduled facility operating hours*

### Outfall Observations for NSWDS:

NSWD = Non-Storm Water Discharge; authorized NSWDS are listed in Section IV (pages 19-20) of the IGP.

**Notate in the remaining sections of this page (page 1 of 1) only if NSWDS(s) were observed or else leave blank and move onto page 2 of 2**

| Outfall Name(s) | Is there a NSWSD or indications of a recent NSWSD?<br>(Yes / No) | If yes, answer the following: |                   | Describe the source of the NSWSD | If it was unauthorized, was it discontinued? (Yes / No) | If it is authorized, describe the BMPs in place to ensure that it does not mobilize or contain pollutants, or cause erosion. |
|-----------------|--|-------------------------------|-------------------|----------------------------------|---|--|
|                 |  | Is it unauthorized?           | Is it authorized? |                                  |   |  |
|                 | <b>YES / NO</b>  |                               |                   |                                  | <b>YES / NO</b>   |  |
|                 | <b>YES / NO</b>  |                               |                   |                                  | <b>YES / NO</b>   |  |
|                 | <b>YES / NO</b>  |                               |                   |                                  | <b>YES / NO</b>   |  |
|                 | <b>YES / NO</b>  |                               |                   |                                  | <b>YES / NO</b>   |  |
|                 | <b>YES / NO</b>  |                               |                   |                                  | <b>YES / NO</b>   |  |
|                 | <b>YES / NO</b>  |                               |                   |                                  | <b>YES / NO</b>   |  |

### Corrective Actions Needed for NSWDS:

*Describe corrective actions needed to eliminate or control NSWDS:*

### Corrective Actions Taken for NSWDS:

*Describe the corrective actions that were taken as a result of the NSWDS:*



Form 2  
Monthly Visual Observations

**BMP & Pollutant Source Observations:**

| Name of Industrial Areas or Activities<br><i>(as listed in the SWPPP)</i> | Are the minimum BMPs described in the SWPPP in place? (Yes / No) | Are the advanced BMPs described in the SWPPP in place? (Yes / No) | Are the existing BMPs effective? (Yes / No) | Describe Corrective Action Needed | Describe Corrective Action Taken including the date that it was implemented |
|---|--|---|---|-----------------------------------|---|
| <b>Entrances/Exits</b>  | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
| <b>Parameter</b>  | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
| <b>Points of Discharge / Outfalls</b>                                     | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |
|   | <b>YES / NO</b>  | <b>YES / NO</b>   | <b>YES / NO</b>                             |                                   |   |