

California Schools Storm Water Compliance Group Storm Water Annual Training

October 6, 2021

wood.



Wood Environment & Infrastructure Solutions, Inc.

Compliance Group Background

- ▶ Group Formed to Assist Each School District Comply with the Industrial General Permit. Benefits include:
 - ▶ Annual training
 - ▶ Regulatory interaction/advocacy
 - ▶ SWPPP templates, reviews, and comments
 - ▶ Sampling/inspection reminders
 - ▶ Analytical support
 - ▶ Assistance with the State's Database (SMARTS)
 - ▶ Annual site visit
 - ▶ Assistance with reporting
 - ▶ Reduced sampling (50% less)

- ▶ Compliance Group
 - ▶ Wood Environment & Infrastructure Solutions (Wood)
 - ▶ Los Angeles County Office of Education (LACOE)
 - ▶ Group Members – School District Transportation Maintenance Yards

Wood Storm Water Support Team

Compliance Group Leaders

**Brent Smith, IGP ToR, QISP, CPESC, QSD/QSP, QSD
Senior Associate Scientist/Project Manager**

(714) 925-4498

Brent.A.Smith@woodplc.com

Mike Lowther, IGP ToR, QISP, CPESC, (R8 QSD)

Senior Scientist/Project Manager

(949) 355-7683

Michael.Lowther@woodplc.com

Additional Staff that may contact you:

Mony Tep – mony.tep@woodplc.com

Bryan Shiang – bryan.Shiang@woodplc.com



Agenda

- ▶ Industrial General Permit Background
- ▶ Monitoring Implementation Plan (MIP)
- ▶ Compliance Overview of the Group
- ▶ Overview of Important Aspects of the Permit
- ▶ Best Management Practices

Industrial General Permit

Clean Water Act (CWA) Amendments (1972)

- ▶ Established National Pollutant Discharge Elimination System (NPDES)

CWA Amendments

- ▶ Required Industrial Storm Water Permits
 - ▶ Federal – Nov 16, 1990
 - ▶ State (California)
 - ▶ Nov 19, 1991 (amended Sep 17, 1992)
 - ▶ Apr 17, 1997
 - ▶ July 1, 2015 (Current Permit)
 - ▶ **July 1, 2020 (Amendment)**

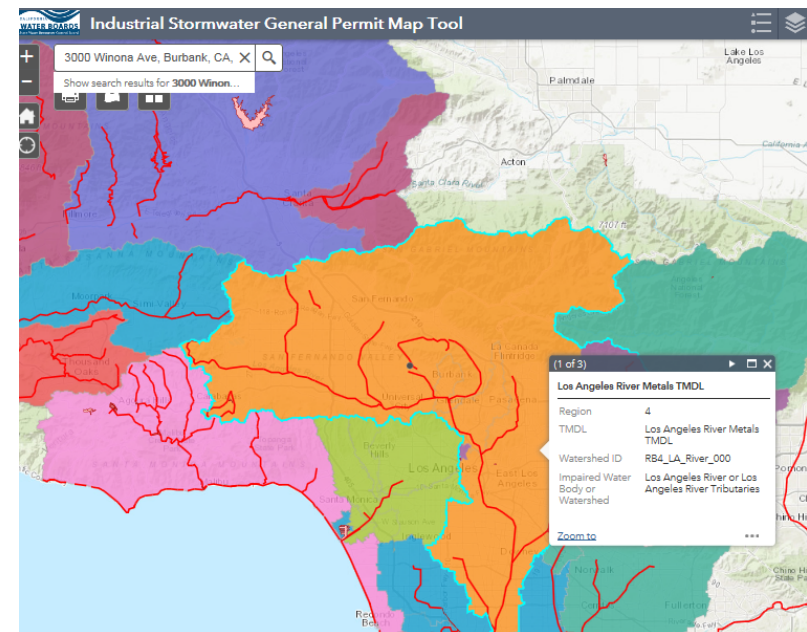


Cleveland, Ohio
November 3, 1952

http://www.ohiohistorycentral.org/w/Cuyahoga_River_Fire?rec=1642

Latest Permit Amendment

- ▶ Total Maximum Daily Loads (TMDLs) incorporated into the Industrial General Permit
- ▶ A TMDL is the maximum pollutant load from identified sources in the watershed that a waterbody can receive while attaining water quality standards.



Permit Amendment - TMDLs

- ▶ Most School Districts in the Compliance Group are in watersheds with TMDLs.
- ▶ The Good News...this hasn't impacted our Group Members.
- ▶ Pollutant source assessments should demonstrate TMDL requirements for pollutants such as metals do not apply. Documented in your SWPPP and Annual Reports...

TMDL	Impaired Waterbody/Watershed	Pollutant	Present in Industrial Facility Storm Water Discharge?
San Diego Creek and Newport Bay Toxics TMDL	Upper Newport Bay	Cadmium, Total	No <input type="button" value="v"/> *
San Diego Creek and Newport Bay Toxics TMDL	Upper Newport Bay	Copper, Total	No <input type="button" value="v"/> *
San Diego Creek and Newport Bay Toxics TMDL	Upper Newport Bay	Lead, Total	No <input type="button" value="v"/> *
San Diego Creek and Newport Bay Toxics TMDL	Upper Newport Bay	Zinc, Total	No <input type="button" value="v"/> *

Covid-19 Permit Implementation

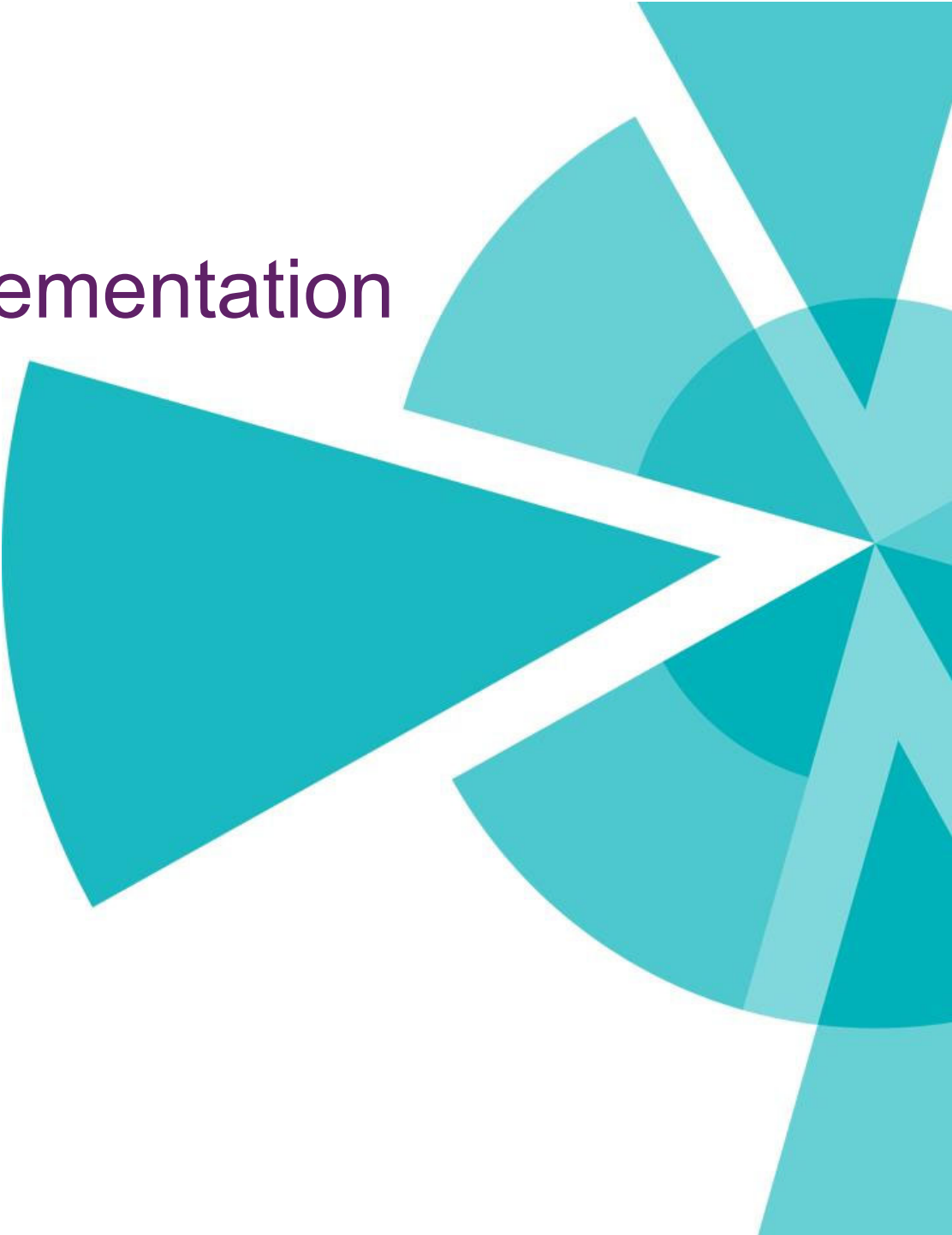


Bottom Line:

- ▶ The Industrial General Permit was not modified due to Covid-19. If there is permit compliance issues due to Covid-19, staffing issues, etc., please contact Wood.
- ▶ DO NOT cease permit implementation.



Monitoring Implementation Plan (MIP)



Monthly Visual Monitoring Forms

Once per calendar month, visually observe each drainage area for the following:

- ▶ Presence or indicators of prior, current, or potential unauthorized and authorized Non-Storm Water Discharges (NSWD) and associated BMPs.
- ▶ Outdoor industrial equipment storage area, outdoor industrial activities, BMPs and all other potential sources of industrial pollutants.

FORM 1 - MONTHLY VISUAL OBSERVATION FORM			
Instructions: > Complete Form during days without precipitation > Complete during daylight operating hours > Authorized Non-Storm Water Discharges (NSWD) such as groundwater and irrigation water must have BMPs listed in SWPPP Section F.6 implemented. > Potential unauthorized NSWD are listed in SWPPP Section F.7. In the event of an unauthorized NSWD, cease the discharge (if safe) and contact Environmental.			
Facility Name: City of Banning Wastewater Treatment Plant			
Observer's Name:	Observer's Title:	Observer's Signature:	
Date & Time of Inspection:		Describe Weather Conditions (Clear/Cloudy/Dry/Temp.):	
Check Month:	<input type="checkbox"/> January <input type="checkbox"/> February <input type="checkbox"/> March <input type="checkbox"/> April <input type="checkbox"/> May <input type="checkbox"/> June <input type="checkbox"/> July <input type="checkbox"/> August <input type="checkbox"/> September <input type="checkbox"/> October <input type="checkbox"/> November <input type="checkbox"/> December		
Section 1 – Authorized NSWD			
List Drainage Areas (DA) Evaluated:			
List Authorized NSWD Sources (i.e., potable water, irrigation water, uncontaminated groundwater):			
List drainage areas with NSWDs listed above:			
Is the NSWD addressed in the SWPPP? Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	Are BMPs in SWPPP implemented? Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	Are SWPPP Revisions required? Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>	
Comments:			
Section 2 – Unauthorized NSWD(s)			
List Drainage Areas (DA) Evaluated:			
Was there evidence of a past unauthorized discharge? Yes <input type="checkbox"/> No <input type="checkbox"/>			
Is there a current unauthorized discharge? Yes <input type="checkbox"/> No <input type="checkbox"/>			
If yes to either of the two questions above, list source of unauthorized NSWD (i.e., wash water, process water, spills/leaks not contained on-site):			
Observations: If "Yes" to either question above, check the applicable items below based on the observations at the discharge point: Floating Material: Yes <input type="checkbox"/> No <input type="checkbox"/> Suspended Material: Yes <input type="checkbox"/> No <input type="checkbox"/> Oil & Grease: Yes <input type="checkbox"/> No <input type="checkbox"/> Discolorations: Yes <input type="checkbox"/> No <input type="checkbox"/> Turbidity: Yes <input type="checkbox"/> No <input type="checkbox"/> Odors: Yes <input type="checkbox"/> No <input type="checkbox"/> Trash or Debris: Yes <input type="checkbox"/> No <input type="checkbox"/> Other:			
Location of Observation:			
Comments:			
Are there potential unauthorized discharge sources not reported under Section F.7 of the SWPPP? Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>			
Are BMP(s) listed in Section F.7 of the SWPPP implemented? Yes <input type="checkbox"/> No <input type="checkbox"/> NA <input type="checkbox"/>			
* If yes to either of the two questions above, revise the SWPPP.			

Non-Storm Water Discharges (NSWD)

▶ Authorized Discharge examples
(Need to include in SWPPP if they occur)

- Irrigation
- Air conditioning condensate

▶ Unauthorized

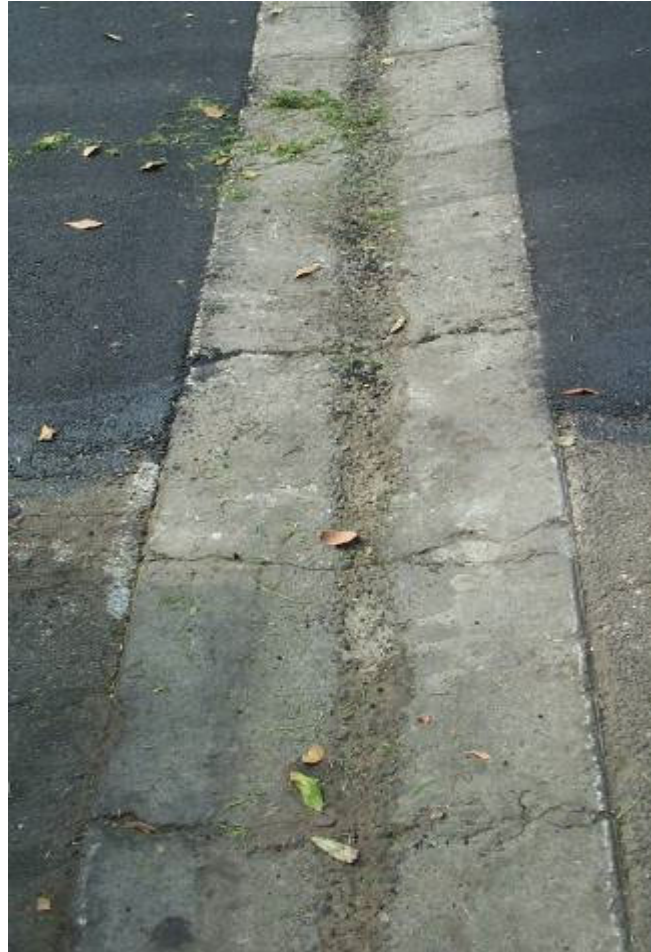
- Washing activities
- Spills or leaks that result in discharge



Observe your Perimeter Visible Discharge Point Indicators



Discharges



Etching



Staining

Observe BMPs

- ▶ Observe outdoor industrial equipment storage area, outdoor industrial activities, BMPs and all other potential sources of industrial pollutants.
- ▶ Pollutant source areas should be consistent with your SWPPP (BMP Summary Table)



Monitoring Implementation Plan

Review your Monitoring Implementation Plan (SWPPP) before sampling:

- ▶ Has the sampling team changed
- ▶ Review where to collect samples
- ▶ Review how to collect samples
- ▶ Review procedures for field instrument calibrations
- ▶ Review chain of custody form
- ▶ Verify sample kits including pH field meter and calibration solutions are available



Sampling Event Requirement

- ▶ As a Compliance Group Member, collect one qualifying event within each half of the reporting year from each designated sampling location.
- ▶ 7 Group Members only require one sample per year.
- ▶ Need to Complete Chain-of-Custody (COC), pH log (when using a calibrated meter), and Form 2 during sampling events.



Sampling Event Observation Form

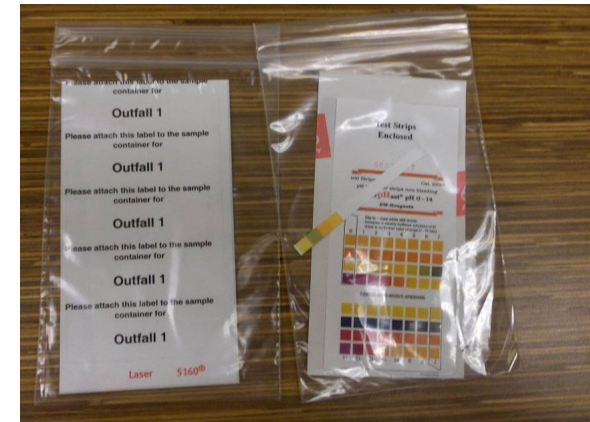
FORM 2 – SAMPLING EVENT VISUAL OBSERVATION FORM		
Instructions: > Complete Form at the same time sampling occurs at each discharge location. > A Qualifying Storm Event (QSE) is a precipitation event that produces discharge for at least one drainage area and is preceded by 48 hours with no discharge from any drainage area. > Sample collection must be completed within four (4) hours of the start of discharge; or, the start of facility operations if QSE occurs within the previous 12-hour period. > Sample and take visual observations only when sampling conditions are safe.		
Facility Name: City of Banning Wastewater Treatment Plant		
Observer's Name(s):	Observer's Title(s):	Observer's Signature(s):
DISCHARGE POINT 1		
Date and Time of Observation and Sampling Effort (use time from C-O-C):		
Was a discharge observed? Yes <input type="checkbox"/> No <input type="checkbox"/>		Was the event a QSE as defined above? Yes <input type="checkbox"/> No <input type="checkbox"/>
Was sample collection conducted within the four (4) hour window as defined above? Yes <input type="checkbox"/> No <input type="checkbox"/>		
Observations: If "Yes" to the questions above, check the applicable items below:		
Floating Material: Yes <input type="checkbox"/> No <input type="checkbox"/>	Suspended Material: Yes <input type="checkbox"/> No <input type="checkbox"/>	Oil & Grease: Yes <input type="checkbox"/> No <input type="checkbox"/>
Discolorations: Yes <input type="checkbox"/> No <input type="checkbox"/>	Turbidity: Yes <input type="checkbox"/> No <input type="checkbox"/>	Odors: Yes <input type="checkbox"/> No <input type="checkbox"/>
Trash or Debris: Yes <input type="checkbox"/> No <input type="checkbox"/> Other:		
Describe probable source(s) of pollutants identified above (if any):		
Describe corrective actions (required for negative responses) and whether SWPPP updates are required:		
DISCHARGE POINT		
Date and Time of Observation and Sampling Effort (use time from C-O-C):		
Was a discharge observed? Yes <input type="checkbox"/> No <input type="checkbox"/>		Was the event a QSE as defined above? Yes <input type="checkbox"/> No <input type="checkbox"/>
Was sample collection conducted within the four (4) hour window as defined above? Yes <input type="checkbox"/> No <input type="checkbox"/>		
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Discolorations: Yes <input type="checkbox"/> No <input type="checkbox"/>	Turbidity: Yes <input type="checkbox"/> No <input type="checkbox"/>	Odors: Yes <input type="checkbox"/> No <input type="checkbox"/>
Trash or Debris: Yes <input type="checkbox"/> No <input type="checkbox"/> Other:		
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Date and Time of Observation and Sampling Effort (use time from C-O-C):		
Was a discharge observed? Yes <input type="checkbox"/> No <input type="checkbox"/>		Was the event a QSE as defined above? Yes <input type="checkbox"/> No <input type="checkbox"/>
Was sample collection conducted within the four (4) hour window as defined above? Yes <input type="checkbox"/> No <input type="checkbox"/>		
Observations: If "Yes" to the questions above, check the applicable items below:		
Floating Material: Yes <input type="checkbox"/> No <input type="checkbox"/>	Suspended Material: Yes <input type="checkbox"/> No <input type="checkbox"/>	Oil & Grease: Yes <input type="checkbox"/> No <input type="checkbox"/>
Discolorations: Yes <input type="checkbox"/> No <input type="checkbox"/>	Turbidity: Yes <input type="checkbox"/> No <input type="checkbox"/>	Odors: Yes <input type="checkbox"/> No <input type="checkbox"/>
Trash or Debris: Yes <input type="checkbox"/> No <input type="checkbox"/> Other:		
Describe probable source(s) of pollutants identified above (if any):		
Describe corrective actions (required for negative responses) and whether SWPPP updates are required:		

► Complete Sampling Event Observation Form during sampling events

Note: Some of the information on the form is required for the AdHoc report in SMARTS. Please complete the entire form.

pH Sampling

- ▶ Analysis for pH must be conducted within 15 minutes of sample collection
- ▶ Recommend all group members use the **calibrated pH meter**. Litmus paper provided should only be used as a backup.
 - ▶ If you are Level 1 for pH, you must use the calibrated meter.
- ▶ **CALIBRATED** pH METER Requirements.
 - ▶ Calibrate the meter on the same day as sampling effort.
 - ▶ Document calibration on field form/pH log form.



Chain-of-Custody

- Samplers need to print name and sign.
- Complete the sample date, time, field pH, and number of containers
- Sign relinquished by.
- If sampling is required using a calibrated pH meter...the COC provided will state it in the Remarks box.

CHAIN OF CUSTODY RECORD														
Facility: XXX Unified School District							REMARKS							
Inspector: _____							TSS (SM 2540D) O&G (EPA 1664)			Standard Turnaround Results to: Wood Environment & Infrastructure Solutions Bill Wood Environment & Infrastructure Solutions for analytical charges.				
Sample Date	Sample Time	Field pH	# of Containers	Outfall Number										
				1	X	X								Field pH sampled using calibrated pH meter.
				2	X	X								
				3	X	X								
				4	X	X								
Relinquished by: (Signature)							Received by: (Signature)			Date/Time				
Relinquished by: (Signature)							Received by: (Signature)			Date/Time				
Relinquished by: (Signature)							Received by Laboratory for analysis: (Signature)			Date/Time				

Grab Sampling Tips

- ▶ Do NOT collect samples from a location that receives flow from other sites (or the street)
- ▶ Do NOT overfill bottles
- ▶ Do Test pH in the field. Do NOT test pH from Sample Bottles
- ▶ Do Label bottles with Facility Name, Date, Sampler Name and Outfall Information
- ▶ Do Place samples on Ice immediately after collection
- ▶ Do Fill Out C-O-C Completely

Sample Kits

- ▶ Wood Team is in process of assembling and distributing sample kits for the 2021/2022 Reporting Year.
 - ▶ Mike Lowther will be contacting each School District to schedule site visits and distribution of kits by October 15th.
-

QSE Notifications

- ▶ Email reminders will be sent prior to forecast Qualifying Storm Events (QSEs) that may occur during typical School District Operating Hours. Will use distribution list for the training.
 - ▶ Review these emails (or distribute to the sampling team) as they may include special instructions (i.e., Eurofins TestAmerica will be moving mid-year to Tustin).
-

FedEx Requests & Monitoring Forms



- ▶ FedEx is no longer providing FedEx slips. After sample collection, email Mike Lowther and Brent Smith and we'll email the FedEx slip for printing.
 - ▶ Submit Monitoring Forms (i.e., Form 2s, pH log sheets, and copies of the C-O-C).
 - ▶ Email: Michael.Lowther@woodplc.com and Brent.A.Smith@woodplc.com
 - ▶ Wood team will review the monitoring forms and contact you if there are errors.
-

When to Collect Samples

Collect samples within four hours of:

- ▶ the start of discharge from a QSE occurring during scheduled facility operating hours; or
- ▶ the start of scheduled facility operating hours if the QSE occurred in the previous twelve hours.



Wood will send emails prior to QSEs that should be targeted for sampling.

Compliance Overview



Summary of CSSWCG 2020-2021 Sampling

Monitoring Program Results	Number of Schools
Samples Collected (1 st half of year)	3
Samples Collected (2 nd half of year)	14
<u>Did Not</u> Collect Samples	4
TSS Exceeded NAL (100 mg/L)	0
Oil/Grease Exceeded NAL (15 mg/L)	0
pH Outside of Range (6 – 9)	2

Total Number of Compliance Group Participants = 18

Sample Reduction Frequency

- ▶ 7 Group Participants have reduced the # of Qualifying Storm Events (QSEs) sampled to 1 per year. To do this, the Group Member must:
 - ▶ Have results from four consecutive QSEs that did not exceed any Numeric Action Level.
 - ▶ Maintain full compliance with the Industrial General Permit.
 - ▶ Must prepare and submit sampling frequency reduction certification in SMARTS.
- ▶ Wood will prepare the certification letters for School Districts that meet this criteria.

California Schools Storm Water Compliance Group (CSSWCG)

Sponsored by: Los Angeles County of Education

July 13, 2020

Facility: Centralia School District (WDID# 8 30i018083)

Address: 6625 La Palma Avenue, Buena Park CA 90620

Subject: Storm Water Sampling Frequency Reduction Certification

Centralia School District (CSD) is a member of the California Schools Storm Water Compliance Group. In accordance with the Industrial General Permit (IGP) Section XI.C.7.a, CSD is eligible to reduce the number of QSEs sampled to one (1) time per reporting year for meeting the following requirements:

1. Results from four (4) consecutive QSEs that were sampled did not exceed any NALs as defined in Section XII.A and Section V.D;
2. CSD is in full compliance with the requirements of the Industrial General Permit (IGP) and has updated, certified, and submitted via SMARTS all documents, data, and reports required by the IGP during the time period in which the samples in Table 1 below were collected; and
3. CSD and the CSSWCG Compliance Group Leader has submitted this documentation as certification via SMARTS that it meets the conditions in Section XI.C.7.a.

Table 1 below summarizes the results of the four (4) QSEs.

Table 1 - Sample Results from Four Consecutive QSEs

Outfall Designation	QSE Sample Date	TSS, mg/L	O/G, mg/L	pH (S.U.)
Outfall 1	12/30/2016	7.6	<1.5 = ND ³	6.3
Outfall 1	1/19/2017	22	<1.7 = ND	7.2
Outfall 1	1/09/2018	39	<1.5 = ND	6
Outfall 1	11/29/2018	5	<1.6 = ND	6
Outfall 1	1/31/2019	23	5	6
Numeric Action Level		100	15	6 - 9

Prepared by: Brent Smith, Group Leader (Wood Environment and Infrastructure Solutions, Inc.)

Sample Reduction Frequency (This Year)

Sample Reduction Frequency
Centralia SD
Covina Valley USD
Murrieta Valley USD
Las Virgenes USD
Rowland USD
Torrance USD*
Santa Monica-Malibu USD*

*Wood preparing the certification letters for School Districts that met this criteria starting in 21/22 Reporting Year.

Sample Reduction Frequency Candidates

Candidates for Sample Reduction Frequency	# of Complete Events with No NALs
Sulphur Springs SD	3
Walnut Valley USD	2
Whittier UHSD	2

Other	Updates/Recommendations
Monrovia USD	No discharge. Continue documenting no discharge events.

Consolidated Group – Level 1 ERA Reports



Level 1 ERAs due 1/1/2022	Constituent
Los Alamitos USD*	pH
Placentia USD*	pH

*Attributed to using litmus paper based on Level 1 Site Evaluations.

Regional Board Site Visits

- ▶ RWQCB staff performed zero (0) site visits last year at compliance group member sites

State of California – Environmental Protection Agency
California Regional Water Quality Control Board – Los Angeles Region

INDUSTRIAL STORM WATER INSPECTION REPORT

FACILITY INFORMATION				
4 191028115	4/2/2019	4151	School Buses	
<small>WQID NUMBER</small>	<small>NOT PROCESSING DATE</small>	<small>BO CODE</small>	<small>TYPE(S) OF INDUSTRIAL ACTIVITY</small>	
Whittier High School District	9402 South Greenleaf Avenue	Whittier, CA	90605	5.03 acres
<small>FACILITY NAME</small>	<small>ADDRESS</small>	<small>CITY</small>	<small>ZIP</small>	<small>FACILITY SIZE</small>
Rafael Delgado	Director of Transportation		562-698-8121	X-1615
<small>OPERATOR OF THE FACILITY REPRESENTATIVE DURING THE INSPECTION</small>		<small>TITLE</small>	<small>PHONE NUMBER</small>	
NEW DISCHARGER: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		IF YES, MEETS BMP STD? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO		<small>LSP WHO SIGNED THE PRD:</small>
EXCEEDANCE RESPONSE ACTION STATUS: <input checked="" type="checkbox"/> BASELINE <input type="checkbox"/> LEVEL 1 <input type="checkbox"/> LEVEL 2 QISP CERTIFICATION: <input type="checkbox"/> YES <input type="checkbox"/> NO				
GROUP MONITORING MEMBER? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		GROUP LEADER CERTIFIED? <input type="checkbox"/> YES <input type="checkbox"/> NO		<small>GROUP NAME</small>
PLASTIC SITE? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF YES, CONTAINMENT AND CAPTURE BMPs? <input type="checkbox"/> YES <input type="checkbox"/> NO		OCEAN PLAN APPLIES? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

INSPECTION LOGISTICS			
July 24, 2019	9:40 AM	11:15 AM	Sunny
<small>DATE</small>	<small>ARRIVAL TIME</small>	<small>DEPARTURE TIME</small>	<small>WEATHER CONDITION</small>
INSPECTION PRE-ANNOUNCED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		PICTURES TAKEN: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
SAMPLES COLLECTED: <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			

PURPOSE OF INSPECTION / CONCLUSION		
<input checked="" type="checkbox"/> COMPLIANCE	<input type="checkbox"/> COMPLAINT	<input type="checkbox"/> ENFORCEMENT FOLLOW-UP
<input type="checkbox"/> IN COMPLIANCE ON DATE OF INSPECTION <input type="checkbox"/> MINOR VIOLATION(S) OBSERVED <input type="checkbox"/> MAJOR VIOLATION(S) OBSERVED <input type="checkbox"/> UNDETERMINED		CORRECTIVE ACTION DUE DATE: _____ <input type="checkbox"/> VIOLATION(S) FULLY CORRECTED <input type="checkbox"/> VIOLATION(S) PARTIALLY CORRECTED (_____%) <input type="checkbox"/> NO ACTION TAKEN
NOTICE OF TERMINATION		NOTICE OF NON-APPLICABILITY (NONA)
<input type="checkbox"/> NEW OPERATOR/OWNER (WQID# _____) <input type="checkbox"/> VACANT <input type="checkbox"/> CLEAN <input type="checkbox"/> OTHER – EXPLAIN _____		<input type="checkbox"/> APPLICATION RECEIVED? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> IF YES, SIGNED BY PE? <input type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> NONA QUALIFIED <input type="checkbox"/> NONA DISQUALIFIED <input type="checkbox"/> NONA RECOMMENDED <input type="checkbox"/> RESULT AND DATE OF STAFF EVALUATION: _____
NO EXPOSURE CERTIFICATION		OTHER – EXPLAIN
<input type="checkbox"/> NEC QUALIFIED <input type="checkbox"/> NEC DISQUALIFIED <input type="checkbox"/> NEC RECOMMENDED		_____

RECOMMENDATION	
<input checked="" type="checkbox"/> ISSUE NOTICE TO COMPLY	<input type="checkbox"/> REINSPECT ON:
<input type="checkbox"/> ISSUE NOTICE OF VIOLATION	<input type="checkbox"/> OTHER:
<input type="checkbox"/> APPROVE NOT, NNA OR NEC	

Luz Vargas <small>INSPECTOR NAME</small>		8/14/19 <small>REPORT DATE</small>
Nerissa Schrader <small>REVIEWER NAME</small>		8/16/19 <small>REVIEW DATE</small>

Regional Board Typical Compliance Issues

- ▶ SWPPP updates
- ▶ SWPPP missing onsite
- ▶ Notice of Intent Documentation Missing from the SWPPP Appendix
- ▶ Housekeeping
 - ▶ Oil stains and spills
 - ▶ Trash receptacles without lids
 - ▶ Aboveground storage tanks without secondary containment

Summary of Important Aspects of the Industrial General Permit



Industrial General Permit – Key Items

	Industrial General Permit
Storm Season	All Year
Qualifying Storm Event	2 days w/o discharge
Sample Collection Frequency (Reduced sampling as a Compliance Group Member)	2X per Year under CSSWCG 1 per each 6-month Period Any Qualifying Storm Event (Sites with sample reduction frequency – 1X per Year)
Sample Collection Window	4-hrs from the start of discharge or 4-hrs from start of business if rain occurred within the last 12 hours.
Dry Weather Inspections	Monthly
Wet Weather Visual Inspections	Only When Sampling
Inspection Forms	Keep at the Facility
Annual Report	Submitted by July 15 th
	SMARTS
	Online Questionnaire (No Inspection Forms)

Industrial General Permit – Key Items

	Industrial Permit
SWPPP Revisions	Upload revised SWPPP to SMARTS (Minor Revisions within 3 months, Significant Revisions within 30 days)
BMPs	Mandatory Minimum BMPs
Sample Data	Complete Sample Result AdHoc Report and Upload Laboratory Report within 30 days
Data Accessibility	EVERYONE HAS ACCESS THROUGH SMARTS
Total Maximum Daily Load (TMDL) incorporation	TMDL incorporation date (Effective July 1, 2020)
Training Requirements	Comprehensive Training/Qualification Requirements for Level 1 and Level 2 Employee Training Requirements

Major SWPPP Components

- ▶ Site Map
- ▶ Industrial Materials
- ▶ Potential Pollutant Sources
 - Loading/unloading
 - Maintenance (vehicle and equipment)
 - Processing (manufacturing)
 - Outdoor Storage (boneyard)
 - Washing/cleaning operations
- ▶ Non-Storm Water Discharges
- ▶ BMPs
 - Mandatory Minimum
 - Advanced
- ▶ Monitoring Implementation Plan

Best Management Practices (BMPs)

Definition:

- ▶ Schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the United States



Vehicle and Equipment Maintenance and Repair

- ▶ Work in designated areas
- ▶ Containment
- ▶ Dry clean up
- ▶ Inspect for leaks
- ▶ Dispose of wastes properly
- ▶ Spill kits



Vehicle and Equipment Fueling

- ▶ Maintain Area
- ▶ Proper Design
- ▶ Use Safeguards
- ▶ Regular Inspections
- ▶ Secondary Containment
- ▶ Spill Materials



Vehicle/Equipment Washing

- ▶ Off-site Commercial Washing
- ▶ Designated and Contained Areas
- ▶ Cover, if Possible
- ▶ Clearly Identify
- ▶ Prevent Runoff



Parking Areas

- ▶ Regular Cleaning
- ▶ Properly Collect Wash Water
- ▶ Clean Oily Deposits
- ▶ Surface Repair Work



Typical BMP Recommendations

Clean Out all Catch Basins/Storm Water Conveyances on a Regular Basis (at least prior to each wet season)

- ▶ No standing liquids in catch basins
- ▶ Avoid re-suspension of dusts/particulates

Improve Housekeeping in Outdoor Areas

- ▶ Focus on high traffic areas (i.e., loading/unloading docks)
 - ▶ Minimize “bone yards”
 - ▶ Avoid storing metal scrap within areas that commingle within industrial areas
 - ▶ Implement erosion/sediment controls for landscaped areas
-

Typical BMP Recommendations (Cont.)

Manage Outdoor Containers Appropriately

- ▶ No residue
- ▶ Cover/move indoors
- ▶ Secondary containment
- ▶ Regularly inspect secondary containment areas
- ▶ Review management of collected storm water

Evaluate outfall modification options

- ▶ Slow down flow/allow settling
- ▶ Filtration

Train Employees on Preventative Maintenance and Housekeeping

Keep SWPPP and Site Map Current

Take home message...

What do you Need to Do?

- ▶ Attend Annual Training
- ▶ Keep site clean
- ▶ Keep SWPPP Current
- ▶ Complete Inspection Forms
- ▶ Collect storm water samples when required
- ▶ Implement BMPs
- ▶ Submit information to compliance group leader as requested
- ▶ Train employees that did not attend this presentation
- ▶ Complete reports/certify reports when required
- ▶ Use Wood as a resource (call or email us)...

Questions?

