



# The Monthly Dirt

# REPORTING 101

*how to make annual reporting smoother and faster*

Annual reports, performance analysis, report cards... yes, they all rank pretty much the same. Doesn't the sound of those just make you cringe? While writing annual reports may be a necessary part of your business, it isn't necessarily the most fun. Can anyone relate? But, are they really all that bad? In a nutshell, annual reports are simply a time when construction operators must give an account of their compliance performance. That doesn't sound too scary does it! The State Water Board uses the report to evaluate how well the construction operators complied with the Construction General Permit (CGP). Annual reports can be seen also as a time of reckoning - there may be some negative repercussions for areas of non-compliance or Numeric Action Level (NAL) exceedances that were not properly addressed during the storm water year. In this edition of **The Monthly Dirt**, we will look at the annual reporting process and give some suggestions in how to improve your process and methods.

**REPORTING PROCESS** – The Annual Report is due on September 1 of each year or when submitting the Notice of Termination (NOT). The reporting period is July 1 – June 30. If a project lasts less than 90 days from the issuance of the NOI to the approval of the NOT, then no annual report is required by the Water Board. This is also true if the beginning or ending portion of the project is less than 90 days of the reporting year. For example, if a project starts on June 1st, then no report will be required on the next September 1st (for June 1 – 30) if the project is continuing. In this case, the annual report will be required either when the NOT is filed or on the following September 1st, whichever comes first. Likewise, if a project submits an annual report on September 1st and subsequently files the NOT on September 15, then no annual report will be required for July 1 – September 15.

The Annual Report is prepared and submitted on the State Water Board's SMARTS website:

<https://smarts.waterboards.ca.gov>

**DEBUNKING A MYTH:** A common misconception is that it must be completed by a QSP or QSD. While it may be a good idea to have one of these individuals, who are familiar with the site, complete the report; it is not required. What is required is that the person completing the report must have a registered SMARTS user account as the Legally Responsible Person (LRP), Duly Authorized Representative (DAR), or Data Entry Person (DEP). They must also be linked on SMARTS to the project. The DEP can populate the report, but only the LRP or DAR can certify it.

**REPORTING METHOD** – There are actually two parts to the Annual Report. The first part is the "Ad Hoc" report. The word "Ad Hoc" is Latin meaning "for this" and is defined as "formed, arranged, or done for a particular purpose only". So, when applied to the CGP, the particular purpose is to report analytical results. An Ad Hoc Report must be completed and submitted on SMARTS for analytical testing performed during each qualifying rain event. This analytical testing may be the field testing of discharges for pH and turbidity; or it may also be the reporting of

analytical laboratory test results for non-visible pollutant sampling. Risk Level 2 and 3 projects which have frequent discharges will have more Ad Hoc reports than Risk Level 1 sites. **TIP:** We recommend that permittees do not wait until the Annual Report time to prepare the Ad Hocs, because it can be a significant amount of work to populate all of the sampling results. Another reason not to wait, is because NAL exceedances must be reported within 10 days. We frequently see non-compliance in this area because dischargers wait until August to prepare their Ad Hocs with the Annual Reports.

The second part of the reporting process is the Annual Report feature on SMARTS. The Annual report is divided into three "forms". "Form 1" reviews attributes of the CGP (following very closely to the risk level appropriate compliance items in Attachment C, D, and E). "Form 2" reports Non-Storm Water Discharges (NSWD). "Form 3" reports a summary of Best Management Practices (BMP) deficiencies. Remember, deficiencies must start to be addressed within 72 hours of becoming aware of them. Ad Hoc reports are automatically incorporated on the "Daily Averages Summary" page. Finally, the Annual Report is required to be certified by the LRP or DAR.



## STILL CONFUSED ABOUT ANNUAL REPORTS?

If you need more help walking through the Annual Report process, the Waterboard has provided a step-by-step resource document that guides you through the submittal process on SMARTS. This document contains screen captures of SMARTS and is very helpful. This document is accessible on the Waterboard's website or by clicking [here](#).

## NEED HELP FILING YOUR AD HOC?

Just as there is a document to help you walk step-by-step through your Annual Report process, the Waterboard has also provided a document to help guide you through submission of an Ad Hoc. It guides you through using SMARTS to submit each Ad Hoc report. This document also contains photos of the entire process! Visit the Waterboard's website or click [here](#) for the link to the document.



## Upcoming Training

**Storm Water Awareness Week:**  
September 23-27, 2019

### What is Storm Water Awareness Week?

Storm Water Awareness Week is a collaboration of professionals who believe that storm water doesn't have to be big business. It's an annual week of free, quality education that happens all over the State of California. This event is great for industrial facilities, municipalities, construction sites, consultants, inspectors, and even the general public. But to make this event successful, we need you to be a part of this year's event. There are several ways you can get involved! First, we need presenters from all different areas of the storm water industry to talk about what you are passionate about in storm water! All you need to do is come up with a workshop(s) and present it in a place that you want to do it – your office, out in the field, or even somewhere fun!! You get to choose! Once you've decided what workshop you want to give, here's what you can expect from us: we'll help you promote your event. We will do this several ways – first through our website. This website has a fun promo video, all the details of the event, free resources, and an interactive registration map. Along with promoting your event, we provide you with free promotional resources all designed with this year's theme. Then, for you as a presenter, our website has a special resources page just for you! Here you can download a thematic PowerPoint template, upload your resources for your workshop so that each attendee has access to your handouts, and stay up to date through our presenter blog. Through our registration page you can interact with all the workshops listed for this year's event. Also, as a presenter we will keep you up-to-date with emails about sign-ups for your workshop. We are super excited for this year's Storm Water Awareness Week. We hope you will join the movement and partner with us as a presenter! But if you can't be a presenter this year, there are still ways to get involved! You can attend this event and catch some of the awesome workshops, and you can also promote this event through the cool promotional materials we provide. We can't wait to have you join us for this amazing storm water movement! Stay tuned for more details!



*Please contact us if you have any questions ...*

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**Technical Questions about Environmental Compliance?**

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SEPTEMBER 23-27, 2019



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