



the **Rain**
events

end of year **Reports & Evaluations**

Practicing good journalism for Annual Evaluations and Reports.

Just like every good reporter needs to sniff out the facts in order to create an accurate report, you too, will need to go fact finding at your facility. Grab a copy of the [Permit](#), a notepad and pencil, and put on your investigation glasses, because the best way to find out the true facts about your facility’s storm water compliance program is to do the Annual Comprehensive Facility Compliance Evaluation (ACFCE or Annual Evaluation). Basically, the Annual Evaluation is a thorough inspection of a facility; an evaluation of that facility’s records, sampling reports, and paperwork; as well as an in-depth look at the facility’s compliance history to evaluate and determine how the facility did during the last reporting year (July 1- June 30). The Annual Evaluation is used to *review* and *improve* a facility’s industrial storm water program. It’s a comprehensive check up for Permit compliance during the past reporting year - comprehensive meaning that this evaluation isn’t just a walk around the facility looking at BMPs, but rather, it’s a very detailed inspection. The Annual Evaluation process includes a review of all sampling reports, visual observations, and inspection records; a comprehensive and in-depth inspection of all areas of industrial activity – especially looking for potential pollutant sources, evidence of these pollutants entering the storm water system, or even the potential for these

Good journalism is all about digging for the facts and then reporting on them accurately and truthfully. It doesn’t matter if you don’t know all the answers before you start, because that’s the point of journalism—finding out the facts. And while it may not be as world renown as the Wall Street Journal, dischargers get a chance every year to show off their own reporting skills through the annual reporting process. Speaking of reports, Annual Evaluation and Annual Reporting time is just around the corner, and in this month’s edition of **The Rain Events**, we’re going to walk you through some things to help your storm water reporting skills excel.

pollutants to become transient. The Annual Evaluation also includes an inspection of all drainage areas that were previously identified as having no exposure to any industrial activity or industrial materials (*according to the NEC guidelines listed in section XVII of the IGP*). As well as an inspection of the equipment needed and used to implement BMPs, an assessment of all the BMPs on the premises, and an evaluation of the effectiveness and appropriateness of selected BMPs. An assessment of any other factors that play into industrial activities and their potential

for discharging pollutants into the environment will also be included as part of the Annual Evaluation. This evaluation may seem like something that only an expert should do, but in fact, if you practice good journalism, find all the facts, and do a thorough investigation, you can do the Annual Evaluation yourself—we even attached an ACFCE form at the end of this newsletter for you to use. (*However, if a facility is moving to a different exceedance response action level (ERA) then they are required to have a professional with a [QJSP certification](#) help them with their ERA response as well as assist them with meeting*

ANNUAL EVALUATIONS
& ANNUAL REPORTS

**EXPERT
ADVICE**

FROM QJSP AND TOR
AARON ORTIZ
WGR SOUTHWEST INC.

“I recommend performing Annual Evaluations in late April, as long as a facility has all its required sampling collected for the monitoring year, or as late as May or early June if any additional sampling is needed.”

ANNUAL EVALUATIONS
& ANNUAL REPORTS

EXPERT ADVICE

FROM QISP AND TOR
AARON ORTIZ
WGR SOUTHWEST INC.

“To avoid the SMARTS backlog from extreme website traffic, I recommend filing your Annual Report in early to mid-June, rather than right before the July 15th deadline.”

all the new requirements for that ERA level which could affect how the Annual Evaluation and Reporting process is typically done.) Since the Annual Evaluation isn't usually done until the end of the compliance year, it's a great idea to do a quick check midway through the year to make sure your storm water compliance goals and sampling program are on track. This saves a lot of hassle and headache come Annual Evaluation and Report time (not to mention the fact that it helps boost your facility's Permit compliance).

Just The Facts: Annual Evaluation

- The Annual Evaluation can be performed at any time as long as it is done no fewer than *eight months*, or no more than *sixteen months* since the last Annual Evaluation was performed (*IGP Section XV*).
- The requirements for performing an Annual Evaluation can be found in the *IGP Section XV*.
- A facility does not need to submit the Annual Evaluation on SMARTS unless requested by the Water Board. However, it does need to be kept on-file and on-site for a minimum of five years (*IGP Sections X.H.1.g.iii, XXI.J.4*).
- An Annual Evaluation should confirm a facility's Permit compliance and not be the time of year when the facility rushes to get their act together and catch up on all the compliance issues they overlooked until then.
- An Annual Evaluation generally takes between 2-4 hours to complete – depending on the complexity and level of compliance of the facility.
- The Annual Evaluation has to be very detailed. If a site is compliant, the evaluation doesn't have to be as detailed as if a facility had potential issues. But to be on the safe side, and to do a thorough report, the more facts and details the better.

- Fines are possible for delinquent Annual Evaluations. (*IGP Section XXI.Q*)

Now that you've gathered all the facts, it's time to start creating the report. The Annual Reporting process may seem intimidating, but if you plan ahead, have all your facts on hand, take it one step at a time, and don't wait until the last minute, you'll do just fine. If you want to have an expert compile your Annual Report, it can save you a lot of stress, but it's not absolutely necessary – do some or all of it yourself. ***The Annual Report is just a list of questions for the discharger to answer which demonstrates that they have complied with all the requirements of the Industrial General Permit.*** All the data you gathered from your facility while doing the Annual Evaluation, the data from the past year's Ad Hocs and the monthly and storm water observations from the past twelve months, are what are used to prepare the facility's Annual Report. Along with the data, you will need to be prepared to give a detailed explanation for any issues of non-compliance as well as prove that you completed your Annual Evaluation.

Sometimes, in an effort to save time, avoid grey area questions, or stretch the compliance truth, it's easy just to answer yes to all the questions and make your facility look perfect. However, it's a good idea to answer all the questions with the true facts - honestly explaining, in detail, your facility's compliance process as well as any reasons behind non-compliant issues. And in the event that the State or a third party would want to inquire more about your facility, you'll want to attach all the supporting documentation needed to back up your statements on your Annual Report.

Remember, the Annual Report does have a deadline, which is July 15th – with fines being

possible for delinquent filers. The best schedule for completing your Annual Report with the least amount of headaches and last-minute crunch time would be to start preparing the Annual Report during early to mid June. This will give you almost a month to find all the appropriate documentation, complete the Annual Evaluation if it hasn't been done by that point, and avoid the overloaded SMARTS system delays and backlogs. Filing any earlier than June could reduce your chance of collecting all the required samples and fixing any compliance issues that arise.

Just The Facts: Annual Report

- The Annual Report is due on July 15th.
- The Annual Report is filed on SMARTS. It's a simple process of answering questions about your facility and uploading any supporting documentation.
- The Annual Evaluation must be completed before filing the Annual Report.
- The more detailed the Annual Report, the less likely the Water Board will make a future inquiry.
- A facility should make sure they have all their sampling done for the year and that they have all their monitoring records completed correctly and readily available for review.
- The Annual Report will ask if the required number of Qualifying Storm Events were sampled, but the lab results are not entered on the actual Annual Report – the results are submitted on the Ad Hocs which are required to be completed within 30 days of obtaining all of the sample results.
- If your facility is subject to Effluent Limitation Guidelines or TMDLs associated with facilities located in regions 2, 4, 8, & 9, you will need to provide the appropriate information concerning those factors, as well as attach the associated documentation to your Annual Report.
- Fines are possible for facilities who fail to submit an Annual Report. (*IGP Section XXI.Q*)

Being a storm water journalist isn't hard. All you need to do is collect all the facts by doing a thorough investigation (or in this case an evaluation), review all of the data from the past storm water compliance year, and then report exactly what you found.

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. Last month's contest question was:

In what ways are you incorporating green alternative practices and products into your facility?

Congratulations to Tina who answered our contest question - *"We are evaluating all of our waste streams and outside storage areas to ensure there is no exposure to the elements, determine other potential means of recycling by adding an additional bailer for plastic and bottles and incorporating berms and socks near our HVAC systems to prevent water flow discharge.* Tina, congrats on going green! Here's a little something for your next Amazon purchase.

...This Month's Contest

Which should be completed first: the Annual Evaluation or the Annual Report?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, May 7th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a \$25 gift card to *Chipotle*.

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Form 3
Annual Comprehensive Facility Compliance Evaluation

The Discharger shall conduct one Annual Evaluation for each reporting year (July 1 to June 30). The Discharger shall revise the SWPPP, as appropriate, and implement the revisions within 90 days of the Annual Evaluation.

Facility Name:	
Reporting Year:	
Name of the Observers:	
Dates of the Inspection & Evaluation:	

Overview of the Annual Evaluation Sections:

- A. A review the sampling, visual observation, and inspection records on the completed Forms 1 and 2
- B. An inspection of all areas of industrial activity and associated potential pollutant sources for evidence of pollutants entering the storm water conveyance system; an inspection of existing BMPs; and review and effectiveness assessment of all BMPs for each area of industrial activity and associated potential pollutant sources.
- C. An inspection of drainage areas having no exposure to industrial activities and materials.
- D. An inspection of equipment needed to implement the BMPs.
- E. An assessment of information needed for the Annual Report

Section A – Review of Sampling, Observation, and Inspection Records

Review all of the completed Forms 1 and 2. Review the data and information that has been submitted on SMARTS. Answer the following questions and provide information as it applies to the facility:

1. Were all outfalls sampled as required by the IGP and as described in the SWPPP?

2. Have all sample results been submitted on SMARTS? (Yes or No; if “no”, explain)

3. Did the facility qualify for representative sampling reduction? (Yes or No; if “yes”, explain)

Form 3
Annual Comprehensive Facility Compliance Evaluation

4. Did the facility qualify for sampling frequency reduction? (Yes or No; if "yes", explain)

5. Did the facility have "Qualified Combined Samples"? (Yes or No; if "yes", explain)

6. Were any NALs exceeded? (Yes or No; if "yes", explain)

7. Summarize corrective action that was specified as needed and that which was taken as recorded on Forms 1 and 2.

8. Identify any outstanding issues that have not been corrected or resolved.

Form 3
Annual Comprehensive Facility Compliance Evaluation

Section B – Inspection and Assessment of Industrial Activities, Potential Pollutant Sources, and BMPs

Review the SWPPP and perform a facility inspection reviewing industrial activities and potential pollutant sources:

- Are there any industrial activities or potential pollutant sources that are not described in the SWPPP? (Yes or No; if “yes”, explain)

- Complete the following table based on the facility inspection:

Name of Industrial Area or Activity <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

Form 3
Annual Comprehensive Facility Compliance Evaluation

Name of Industrial Area or Activity <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

Section C – Inspection and Evaluation of Drainage Areas Having “No Exposure” to Industrial Activities

Review the SWPPP and perform a facility inspection of areas of the facility identified in the SWPPP as not having industrial activities or materials:

1. Are there any areas at the facility that are excluded from sampling and observations because they do not contain industrial activities or industrial materials? (Yes or No; if “yes”, explain)

2. Are these “No Exposure” areas identified in the SWPPP and is there a NEC Checklist for each one? (Yes or No; if “no”, explain)

3. Based on the inspection, do these areas still qualify for “No Exposure”? (Yes or No; if “no”, explain)

Form 3
Annual Comprehensive Facility Compliance Evaluation

Section D – Inspection of Equipment Needed to Implement the BMPs

Review the BMP descriptions in the SWPPP and perform an inspection and inventory evaluation of equipment and supplies needed to implement the existing BMPs. Complete the following table:

Minimum BMP	List the equipment specified in the SWPPP	List the equipment and supplies that needs to be repaired, replaced, maintained, or re-stocked
Good Housekeeping		
Preventative Maintenance		
Spill and Leak Prevention and Response		
Erosion and Sediment Controls		
Employee Training Program		
Treatment Control		
Storm Resistant Shelters		
Storm Water Containment or Diversion		

Form 3
Annual Comprehensive Facility Compliance Evaluation

Section E – Assessment of Information Needed for the Annual Report

Complete the following checklist and questions based on the review of the SWPPP; review of the sampling, observation, and inspection data; and the facility inspection.

1. Compliance Checklist:

Question	Response & Explanation
What is the ERA Level for the Facility for the current reporting year? (Baseline, ERA Level 1, or ERA Level 2)	
What will be the ERA Level for the Facility for the next reporting year? (Baseline, ERA Level 1, or ERA Level 2)	
<i>Answer the following yes or no, and provide explanations for any "no" answers:</i>	
Has the facility filed for IGP coverage on SMARTS?	
Has the facility eliminated all unauthorized NSWDS?	
Were all storm water results below effluent limit guidelines (ELGs) and/or Numeric Action Levels (NALs)?	
Does the facility have an up to date SWPPP and facility map?	
If required, has the SWPPP been revised by a QISP?	
Does the SWPPP specify all of the minimum BMPs required by the permit?	
Have all BMPs specified in the permit been implemented at the facility?	
Are the existing BMPs effectively preventing the discharge of pollutants and NSWDS?	

Form 3
Annual Comprehensive Facility Compliance Evaluation

Question	Response & Explanation
Did the facility collect all of the required samples and perform all of the required observations and inspections?	
Did the facility test storm water samples for all of the required and SWPPP-specified analytes?	
Did the facility perform an Annual Comprehensive Facility Evaluation?	
Did the facility submit an Annual Report for the previous reporting period?	

2. List necessary revisions to the SWPPP or facility map and provide the date the revision was made and the SWPPP section number of the revision.

Revision	Date Revision was Made	Sections of the SWPPP Revised