

# STAYING DRY

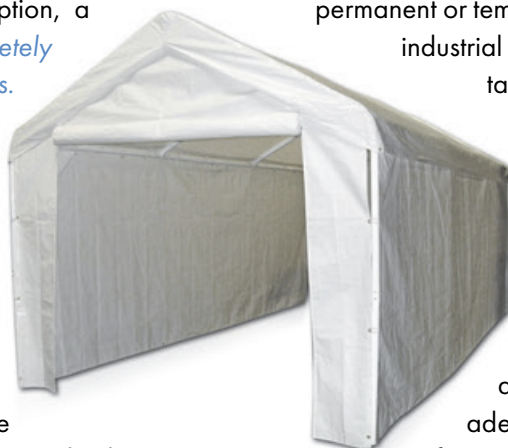
## STORM-RESISTANT SHELTERS

When you hear the phrase “storm-resistant shelter,” what comes to mind? An underground safe house for those living in tornado country? Well, for those who are involved with an industrial facility in the State of California, the mention of storm-resistant shelters should immediately bring Advanced BMPs and No-Exposure Certifications to mind. A storm-resistant shelter is a very valuable BMP, especially as we see many facilities already moving towards Level 2 ERA status. In this edition of **The Rain Events**, we’re going to take a look at this BMP and what the Industrial General Permit defines as a “storm-resistant shelter.”

So, what is a storm-resistant shelter? While the term can apply to a wide range of structures, the Permit’s requirements for No Exposure Certification includes a brief description in Section XVII.B.5. According to this description, a storm-resistant shelter *“includes completely roofed and walled buildings or structures.*

*Also includes structures with only a top cover supported by permanent supports but with no side coverings, provided material within the structure is not subject to wind dispersion (sawdust, powders, etc.), or track-out, and there is no storm water discharged from within the structure that comes into contact with any materials.”* For

NEC-compliant storm-resistant shelters, there are basically two options – structures that are completely enclosed, and structures that are only partially enclosed. The “completely enclosed” category includes buildings such as warehouses and sheds, but it can also include other structures that are completely roofed and walled – such as portable sheds and shipping containers, provided they are in good condition and don’t leak. The “partly enclosed” category includes structures that have a top cover but no walls, such as awnings and the like. Notice the additional requirement here – these types of non-walled structures are only considered storm-resistant if the materials stored within the structure are not subject to wind dispersion. Also, notice that these structures must be supported by permanent supports.



Storm-resistant shelters can also be used as an Advanced BMP, and are not subject to as many requirements as NEC-compliant structures. As an advanced BMP, storm-resistant shelters can be permanent or temporary, and can even include simply covering industrial materials with a properly secured waterproof tarp.

But storm-resistant shelters have to actually be storm resistant – if your tarp setup can’t withstand high winds, or is installed in a way that causes the tarp to fail due to rain or snow loads, it doesn’t classify as “storm resistant.” And since the main purpose of storm-resistant shelters is preventing storm water from contacting industrial materials or activities, choose a waterproof shelter that adequately protects your materials and activities from precipitation. So while a tarp-and-string shelter might qualify as a temporary exposure minimization

BMP, it won’t be sufficient if you’re applying for NEC status.

When is a storm-resistant shelter needed? The most common application of these shelters is at facilities applying



for No Exposure Certification coverage. As outlined in Section XVII of the IGP, this special type of Permit certification is for industrial facilities that no exposure of industrial materials and activities to precipitation, have eliminated non-storm water discharges, and have submitted the required

certification documents on SMARTS. The NEC-specific definition of storm-resistant shelters makes it clear that these shelters must be permanent, and must effectively prevent storm water from contacting industrial materials or activities. However, Section XVII.D lists some situations where a storm-resistant shelter is not required to qualify for NEC coverage – including outdoor storage of tightly sealed containers, adequately maintained vehicles, temporary shelters for remodeling and construction purposes, and a few others.



A storm-resistant shelter is a great BMP, and while invaluable for dischargers looking for NEC coverage, it's also definitely something to consider for facilities that are already moving towards Level 2 ERA status. And remember that storm-resistant shelters are not necessarily limited to warehouses or other buildings, especially when used as an exposure minimization BMP.

A properly secured tarp could do the job, as could a properly installed carport canopy from a discount hardware store. By exercising a little creativity, there's a good chance you will be able to come up with a storm-resistant shelter that fulfills the Permit requirements but doesn't break the bank. ☔

## Storm Water in Cold Environments



Did you know that snow is considered to be storm water? Even though it may not cause an immediate discharge, it will eventually cause one (or probably many) when the temperature starts warming up – at which point, it will need to be sampled just like rain water. Think of snow as impounded storm water; it stays on your site until the weather gets warm. As such, make sure that you keep your industrial materials and activities out of the snow as much as possible. Remember that any pollutants that get picked up by the snow will eventually discharge off your property, and the discharge will need to be sampled as required in the Industrial General Permit. So, let it snow, but apply good BMPs, practice good housekeeping, and keep your industrial materials and activities under cover if possible.

Have questions about the Industrial General Permit?  
Give us a call at (209) 334-5363, ext. 114

## "To Do List" for December:

- ☁ Perform the December monthly inspection
- ☁ Obtain a storm water sample from each drainage area
- ☁ You should be putting the finishing touches on your Level 1 Technical Report, so that it's ready to submit **before** January 1, 2017.

## Santa's Favorite BMP



If you're looking for a good BMP for use in cold environments, ice, and snow, check out Filtrexx Siltsoxx. This filtration device is heavy enough to be installed without trenching – great for facilities with frozen ground. Plus, BMP Outlet has a bunch in stock, in case you need to do some last-minute Christmas shopping.

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

## The Rain Events

Newsletter Editor: **John Teravskis**  
QSD/QSP, QISP, CPESC, ToR, IGPTT Participant  
[jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com)  
(209) 334-5363 ext. 110 or (209) 649-0877

## Technical Questions about Environmental Compliance?

Call ...

**Aaron Ortiz**, QISP, ToR, [aortiz@wgr-sw.com](mailto:aortiz@wgr-sw.com)  
(209) 334-5363 ext. 114

**Steve Teravskis**, [steravskis@wgr-sw.com](mailto:steravskis@wgr-sw.com)  
(209) 334-5363 ext. 115

**Chelsea Dreyer**, [cdreyer@wgr-sw.com](mailto:cdreyer@wgr-sw.com)  
(562) 799-8510 ext. 1003



WISHING YOU A

**MERRY**

*FROM THE RAIN EVENTS STAFF*

**CHRISTMAS**

Thanks for trusting us with your compliance questions! We hope you enjoy the holidays and encourage you to take some time to remember the first Christmas.



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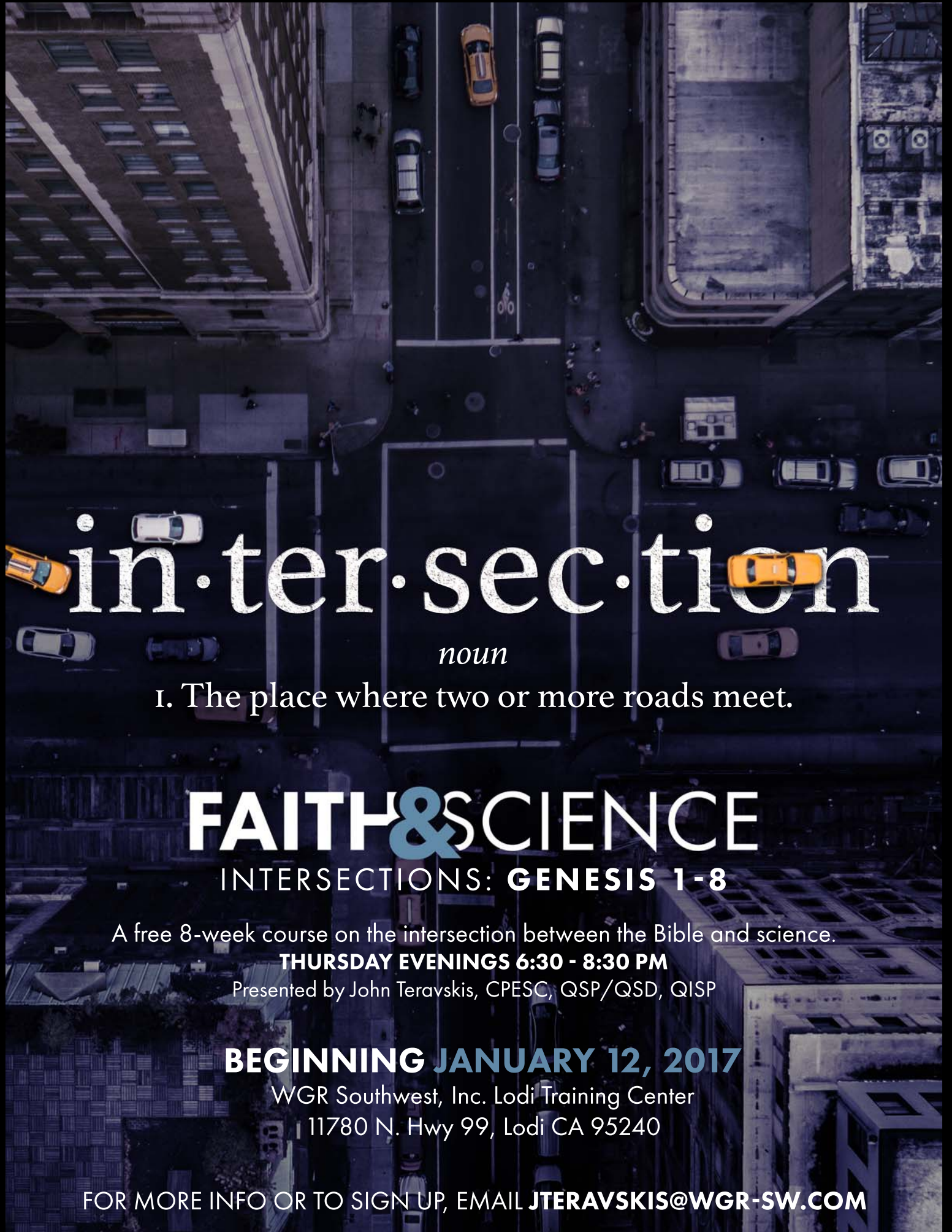
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# in·ter·sec·tion

*noun*

1. The place where two or more roads meet.

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Grab your pH quickly and accurately with the **Oakton Waterproof pHTestr 30**, a necessary tool for all storm water samplers. This handy device is completely waterproof, and is designed to float in case it gets dropped in water. The device analyzes to +/- 0.01 pH accuracy, and has a quick and simple calibration process. The **pHTestr** also measures the temperature of your sample, allowing you to record both results simultaneously. Also, the pH sensor can be easily removed and replaced to ensure years of accurate operation.

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- Battery Life: 500 hours under normal conditions
- Dimensions: 6.5" Long x 1.5" Diameter

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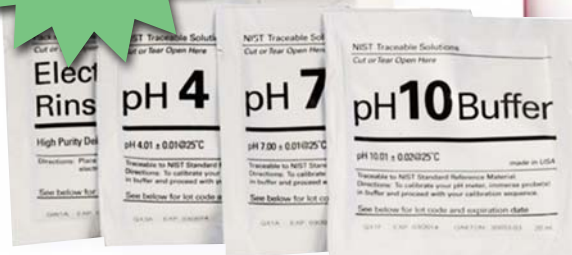


## pH Buffer Solutions

Your pH pen is only as accurate as your buffer solution. Have you checked the expiration date on your buffers recently? It may be time to get new buffers. BMP Outlet carries a couple different pH buffer kits to suit different jobs and uses. The Oakton pH Singles Assortment Pack is good for situations that require calibrating in the field, since you can place the pen inside the packets for the calibration process. Our pH Solution Three Pack is great for a more controlled calibration environment.

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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 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 question was:

### What constitutes an Instantaneous NAL exceedance?

Great job, Jonathan Meronek! You are correct. **An Instantaneous NAL exceedance occurs when analytical results for any parameter within a reporting year exceed the Instantaneous Maximum NAL values for TSS, Oil and Grease, or pH.**

Jonathan wins \$25 to Claim Jumper for a slice of Chocolate Motherlode Cake!

## This Month's Contest Question:

**A facility applying for NEC coverage has an on-site tank yard that is uncovered but is located in a secondary containment structure that will not discharge. Does this qualify for NEC coverage? Think carefully!**

By January 13, 2016, submit your response to the above question by sending an email to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). All persons submitting the correct answer will be placed in a drawing. The winner will receive a 1-lb box of See's Assorted Chocolates.



year end  
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