

## COMING SOON THE INDUSTRIAL GENERAL PERMIT

Coming this summer – an exciting new edition of... The Industrial General Permit! So maybe it's not as epic as the latest super hero flick, but it certainly is coming, *and fast*. We are quickly approaching the July 1 launch date of the new Industrial General Permit (order 2014-0057-DWQ), and along with it, a very important deadline for industrial facilities conducting operations in the State of California. In this edition of *The Rain Events*, we have compiled a list of important things you need to do before July 1, 2015.

### **PRDS FOR NOI COVERAGE**

The majority of industrial facilities in California will be filing for NOI (Notice of Intent) coverage under the new IGP, which means there are at least three items you must submit to the Water Board. These three items are the Permit Registration Documents (or PRDs) that are required to be submitted before receiving permit coverage. They include a NOI form, a site map, and a Storm Water Pollution Prevention Plan (SWPPP). If you haven't done so already, now is the time to make sure your site map and SWPPP are accurate and up-to-date. The new IGP is quite different from the previous permit version, so you will have to revise your SWPPP and site map to maintain compliance. Again, if you haven't already started revising your SWPPP, don't wait any longer – or your SWPPP may not be finished on time. Also, the State is moving towards a paperless submission process, so all of these PRDs will need to be submitted online. The State has established an online database called SMARTS to be used for submitting these documents. If you do not have a SMARTS account, you will need to create one to upload your PRDs. For more information

about the SMARTS system, listen to [this helpful podcast](#) we recorded a few months ago with industry expert Aaron Ortiz.

### **FILING FOR A NOT**

Not every industrial facility requires coverage by the Industrial General Permit. Your facility may be able to skip permit coverage by applying for a Notice of Termination (NOT). Transportation facilities (SIC codes 40XX-45XX and 5171; excluding 4221-4225) may be able to get out of IGP coverage if they can demonstrate there are no vehicle maintenance, equipment cleaning, or airport de-icing activities performed on-site. If this might apply to your site, check out *The Rain Events* article from October 2014.



### **FILING FOR A NONA**

Eligible industrial facilities can also get out of permit coverage by applying for a NONA, or Notice of Non-Applicability. If your facility is engineered and constructed so that it can contain the maximum historic rain event for your location, or if your facility is located in an area that is not hydrologically connected to any water bodies, then you may be able to apply for a NONA. The requirements for a Notice of Non-Applicability are found in Section XX.C of the new Industrial General Permit.

### **FILING FOR A NEC**

There is a third option available – No Exposure Certification (NEC). But wait! The deadline for NEC applications is October 1, 2015, so why stress out?

*(Continued on next page)*



(Continued from page 1) This may seem a little counter-intuitive, but unless you are absolutely certain you meet the requirements for NEC coverage, *The Rain Events* recommends filing for NOI coverage while waiting to apply for NEC. If you allow your NOI and WDID to expire and find out the Water Board doesn't agree with your no exposure assessment, you will have to reapply for the NOI and pay the permit fee again. It's better to be safe than sorry. The wrench in the gears is that the NEC part of SMARTS is not yet up and running. However, in a workshop given by the State Water Resources Control Board, Patrick Otsuji stated that the SMARTS system will be ready to accept NEC applications on July 1, 2015 (see the [workshop notes here](#)). Again, we recommend recertifying your NOI using the recertification letter sent out by the Water Board last December/January. If you have not received your NOI recertification letter, have the Legally Responsible Person email the SMARTS staff and request a copy. Once your NOI is recertified, apply for NEC coverage on July 1 or as soon as possible. Of course, this is assuming that your facility meets the requirements found in Appendix 2 of the new Industrial General Permit.

## CONCLUSION

For those of us who can never seem to find enough time to get everything done, July 1 may still seem far away – but it's not. If you are an industrial facility operating in California, you are most likely required to have coverage under the Industrial General Permit, which means there are some action steps you need to take to maintain compliance.

*Note: If you are unsure if your facility needs coverage under the Industrial General Permit, grab your SIC code number (see last month's edition of *The Rain Events*), and turn to Appendix A of the new Industrial General Permit, where you will see a list of which facilities are required to have IGP coverage.*

# the Compliance corner

## SIC Code Webinar

Yes, we just published this last month, but it's such a good resource that we wanted to send it out again. Plus, the State Water Board now has this video linked to the new IGP Toolbox on their website! If you have questions about SIC Codes and how to determine which one applies to your facility, listen to this extremely informative webinar with Laurel Warddrip, the Program Manager for the State Water Board.



[https://www.youtube.com/watch?v=cTM\\_P2gwJMs](https://www.youtube.com/watch?v=cTM_P2gwJMs)

Need a SWPPP revision for the new permit?  
Give us a call at (209) 334-5363, ext. 114

## "To Do List" for June:

- ☛ Recertify your NOI before July 1. If you want to apply for a NOT, we recommend recertifying for NOI coverage and applying for a NOT *after* the new IGP comes into effect. In case your NOT is not accepted before July 1, this will ensure you will not be without permit coverage.
- ☛ Perform the 4<sup>th</sup> Quarter Non-Storm Water Observation (Forms 2 & 3) by June 30.
- ☛ Prepare and submit your 2014-2015 Annual Report on or before July 1

## LATE BREAKING NEWS: Definition of QISP Updated by the State

At a recent meeting with the State Water Board, a question was raised about the definition of QISP as found in the new IGP glossary. The glossary seems to indicate that certain tasks (such as performing Annual Evaluations) can only be done by a QISP. Laurel Warddrip, from the State Water Resources Control Board, clarified in an email dated June 2, 2015 that after consulting with the Water Board's legal counsel, it was decided **"...in the context of the entirety of the permit, the glossary definition of the QISP should be interpreted as allowing a QISP to perform an annual evaluation, but not requiring a QISP to perform the annual evaluation."**

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

**The Rain Events** Newsletter Editor:

John Teravskis  
QSD/QSP, 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, [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



COME SEE OUR  
SHOWROOM!

11780 N. HWY 99,  
Lodi CA 95220

## PRODUCT SPOTLIGHT

Are you ready for the new Industrial General Permit? As of July 1, 2015, dischargers will have to start analyzing pH **within 15 minutes of collecting storm water samples**. 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.

### Product Specifications:

- Accuracy: +/- 0.01 pH accuracy
- Range: -1 to 15 pH
- Temperature Range: 32° to 122° F
- Batteries: (4) 1.5V button batteries
- Battery Life: 500 hours under normal conditions
- Dimensions: 6.5" Long x 1.5" Diameter



ONLY  
\$115.00



BMP Outlet is a supply house for affordable erosion control products, drain inlet protection, sorbents, spill containment, and field instruments.

We have a large inventory of many different types of product, and can usually order whatever you need for your project.

## pH Buffer Fluid

Since pH Pens need to be calibrated each day they are used, pH calibration buffers are a necessary part of every sample kit. We sell all three of the common standards - 4.01, 7.00, and 10.00. These standards are available in 500 mL bottles, or in handy single-use calibration packets.

### Oakton pH Buffer Pack

**Contains:** 4.01, 7.00, and 10.00 Buffers

**Size:** (1) 500 mL poly of each solution

### Oakton pH Singles Assortment Pack

**Contains:** 4.01, 7.00, 10.00, and Rinse

**Size:** (5) 20-mL packets of each solution (20 total)



Only \$28.00  
(Buffer Pack)

Only \$31.00  
(pH Singles)

Check out our  
website!

shop.bmpoutlet.com

BMP Outlet • sales@bmpoutlet.com • (209) 334-5363, ext 115



## 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, the question was...

**Where can you find a list of which SIC codes are required to have Industrial General Permit coverage?**

Congratulations, Deborah Antonucci - you are correct! Industrial facilities can find a list of which SIC codes are required to have permit coverage by turning to Attachment A of the new Industrial General Permit (2014-0057-DWQ). And as Deborah said, not every SIC code requires permit coverage.

Deborah wins a \$25 gift card to Amazon.com to buy some new sampling gear!

## This Month's Contest Question:

**What three documents make up the Permit Registration Documents for the Industrial General Permit?**

By June 30, 2015, submit your response to the above question by sending an email to [steravskis@wgr-sw.com](mailto:steravskis@wgr-sw.com). All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift cart to Panera Bread.



**STARTING AT ONLY**



PER FINISHED MINUTE

**WGR**  
VIDEO & MEDIA

CALL US FOR A FREE ESTIMATE! (209) 334-5363, EXT. 107