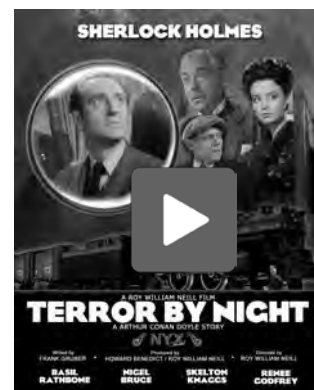


MONTHLY INSPECTIONS

Looking for clues

In the 1946 classic film *Terror by Night*, when the fabled Star of Rhodesia diamond is stolen on a London to Edinburgh train and the son of its owner is murdered, **Sherlock Holmes** (played by Basil Rathbone) and Dr. Watson (the incomparable Nigel Bruce) must discover which of his suspicious fellow passengers is responsible. What makes these who-dun-it films so fun is that as the clues are revealed, the story twists and morphs in different directions until the final outcome is revealed in the last moments of the film. Although inspecting industrial facilities and looking for clues about pollutant sources will probably never make it to the silver screen; this edition of *The Rain Events* features a brief refresher on how to perform monthly visual inspections – including what needs to be covered during each inspection – and offers some tips on documenting the clues.



The requirement for monthly visual observations can be found in Section XI.A.1 of the Industrial General Permit – which clearly states that “At least once per calendar month, the Discharger shall visually observe each drainage area.” Subsection XI.A.1.b gives a few more details, stating that these observations “shall be conducted during daylight hours of scheduled facility operating hours and on days without precipitation.” Given this information, it is important to note a couple things – first, **these monthly inspections are not sampling events**. The permit clearly says these inspections are to be performed on days *without precipitation (rain)*. The purpose of these inspections is to determine if there are any non-storm water discharges (NSWDs) occurring at the facility, or if any industrial materials are (or could) cause a pollution problem. Secondly, **the inspections are to be performed during normal business hours**. Performing these inspections during normal industrial activity helps to ensure that your observations accurately reflect what is happening at your site.

So, you’re walking around the facility with a clipboard in hand, ready to do the monthly inspection. What clues should you be looking for? *Elementary, my dear Watson*, the Permit lists three things to be on the lookout for: **First, look for “indications of prior, current, or potential unauthorized NSWDs and their sources.”** What is an unauthorized NSWD? Simply put, it is anything that doesn’t appear on the list of authorized non-storm water discharges found in Section IV of the Permit. Look for current non-storm water flows, but also look for indicators of past flows, and keep an eye out for situations which could potentially cause a non-storm water discharge. **Second, look for “Authorized NSWDs, sources, and associated BMPs to ensure compliance with Section IV.B.3 [of the Permit].”** Again, only if it appears on the list in Section IV of the Permit can it be classified as an “authorized non-storm water discharge.” If you see an authorized non-storm water discharge, don’t just dismiss it and walk on. Section

IV.B.3 has a list of BMPs that should be reviewed to see how many are being implemented for each authorized non-storm water discharge. **Third, look for “Outdoor industrial equipment and storage areas, outdoor industrial activities areas, BMPs, and all other potential source of industrial pollutants.”** Basically, be on the lookout for situations that could cause an unauthorized NSWD or contaminate storm water runoff.

Once the inspection is finished, there is still work to be done. According to the Section XI.A.3 of the Permit, you will need to record the date and approximate time of your inspection, the locations observed, the presence and probable source of any observed pollutants, the name of the inspector, and any response actions or needed SWPPP revisions. This is quite a bit of information – to make the inspection process a little easier, it’s a good idea to use an intuitive form that can be filled out during the actual inspection. Not only is this a whole lot simpler; it also ensures that the inspector doesn’t forget any important information.

Visual observations are an important element of keeping your facility compliant and are not something that can be overlooked or classified as “I’ll get around to it when I can.” You will have to account for all of your monthly observations in your facility’s Annual Report and will be required to give an explanation for any months that were missed. Therefore, we recommend setting up a schedule for performing the monthly visual inspections, such as the first Monday of each month. Of course, the schedule may need to be changed slightly depending on weather conditions but try to stick as close as possible to the schedule. Check out *The Compliance Corner* for links to some forms that we created especially for monthly visual observations. **So, Dr. Watson, when you have excluded the impossible, whatever remains, however improbable, must be the truth.** 🕵️

the Compliance corner

Monitoring Forms

WGR Southwest, Inc. has developed forms to be used for recording IGP required monitoring data – such as monthly visual inspections, storm water sampling visual observations, and the Annual Comprehensive Facility Compliance Evaluation. And now, we are offering these forms for free to readers of *The Rain Events!* The link below will allow you to download a zipped file with the forms in a MS Word format.

Form 1: Sampling Event Visual Observations and Analytical Results

Use this form to record your visual observations taken during a sampling event. This form comes with a Qualifying Storm Event Evaluation, a section to record observations, and a corrective action summary. The second page of the form contains a table where all of the analytical results can be recorded.

Form 2: Monthly Visual Observations

Like the main article says, dischargers under the Industrial General Permit are required to inspect their facilities on a monthly basis. Use this form to record your observations and assessments of non-storm water discharges.

Form 3: Annual Comprehensive Facility Compliance Evaluation

This form is for recording the findings of the Annual Comprehensive Facility Compliance Evaluation. There are sections on this form for a review of the facility monitoring records, an inspection of the facility grounds, equipment inspections, and an assessment of the information needed for the Annual Report.

[Click here to download all of these forms.](#)

<https://download.wgr-sw.com/documents/5dc3222b73014-IGP-Inspection-Forms-Created-by-WGR-Southwest,-Inc..zip>

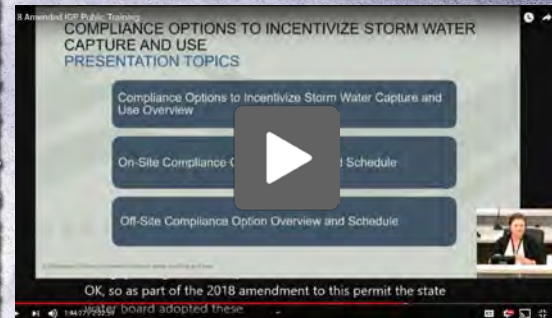
Need a Sherlock Holmes to look for clues at your facility?
Give us a call at (209) 334-5363, ext. 114

"To Do List" for November:

- ☔ Perform the November monthly inspection
- ☔ Try to get two samples between now and December 31, when the rains begin.
- ☔ Work on your ERA Level 1 or 2 reports / action plans and submit them to the Water Board by January 1.
- ☔ Make sure pollutant sources are under rain-proof covers.

Learn about the 2018 Amended Industrial Storm Water General Permit

Significant changes have come to the Industrial General Permit which include sufficiently sensitive analytical test method implementation, Total Maximum Daily Load applicability and implementation, and compliance options to incentivize storm water capture and use. On August 19 of this year, the State Water Board held a public training workshop in Sacramento to review these important changes. In case you missed this workshop, you can still view a recorded version of it. Click on the link below to access the video or click [here](#) to download the slides and the 2018 IGP amendments.



Please contact us if you have any questions ...

The Rain Events

Newsletter Editor: John Teravskis
QISP, QSP/QSD, CPESC, ToR, IGPTT Participant
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
(209) 334-5363 ext. 114

Chelsea Dreyer, QISP, cdreyer@wgr-sw.com
(562) 799-8510 ext. 1003



we're thankful

for you, our readers; a country where we are free to live, for clean water, and...
the little surprises in life!

Psalm 118:29

THE KEY

MADE YOU LOOK.

WELL, ACTUALLY, WE ARE HAVING AN EARLY THANKSGIVING SALE! SO USE THE ABOVE CODE TO GET 20% OFF AN ALL-ACCESS PASS FOR THE ONE, THE ONLY...FORGE.

PROFESSIONAL DEVELOPEMENT.
CONTINUING EDUCATION.
BACK TO THE BASICS.

WGR-SW.COM/TRAINING



DON'T HIRE DAVE.

Dave's a great guy. But when you hire Dave, think about what else you're signing up for. Dave needs a **salary, medical insurance, vacation, and sick time**. Just a hunch, but he probably needs **vision coverage** too. Hiring Dave increases your **overhead**, and who can afford overhead these days?

Let WGR take care of your environmental, health and safety needs.
Unlike Dave, we're not a full-time employee.

Dave knows a lot in his area of expertise. But WGR has a staff of people, each with a wide range of expertise, at your disposal. Dave needs training and continuing education. As consultants, it's our job to stay ahead of the curve. Dave's a full-time employee you'll need to keep busy. **WGR will be there when you need us, and not when you don't.**

WGR Southwest, Inc. We can work with your budget.
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CHANGE YOUR COURSE!

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only have one chance at baseline status.

Let us help navigate the storm.

*A single NAL exceedance will change your
facility from Baseline to Level 1.*

**What does this mean?
More money.**

Level 1 Dischargers must:

- Appoint a QISP
- Perform a Level 1 Evaluation
- Evaluate the Need for Additional BMPs
- File a Level 1 ERA Report

Level 2 Dischargers must:

- Further Evaluate BMP Options
- Install additional BMPs, which may include structural or mechanical devices
- Prepare a Level 2 Action Plan

Exceedance Avoidance Strategic Investigation

Take the EASI route to safe harbor!

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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 question was:

What are your personal monopoly board game house rules?

Last month's newsletter was a lot of fun! We only had two entries with Monopoly "house rules", and, ironically, they both involved "Mom". **Katy** (last name withheld, because we don't want her mom finding out) wrote: *My personal Monopoly House Rule: Don't Play Monopoly with Mom or my sister! Every time we play board games with them, especially Monopoly, it turns into a huge argument or my mom is paying people just to stay in the game by making up her own rules as she goes. One time she got so mad she was losing she threw the Monopoly board out into the snow! Katy wins a \$25 gift card to Starbucks, and maybe she should treat her mom!*



This Month's Contest Question:

WHERE WOULD BE A GOOD PLACE TO OBSERVE FOR NON-STORM WATER DISCHARGES?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, November 29th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a \$25 gift card to The Honeybaked Ham Company.



Need sampling ideas?

This video recently released from the State Water Board provides guidance on how to obtain representative samples from industrial discharge points that are sometimes complicated.



<https://www.youtube.com/watch?v=sNjcU4iNvTI&feature=youtu.be>