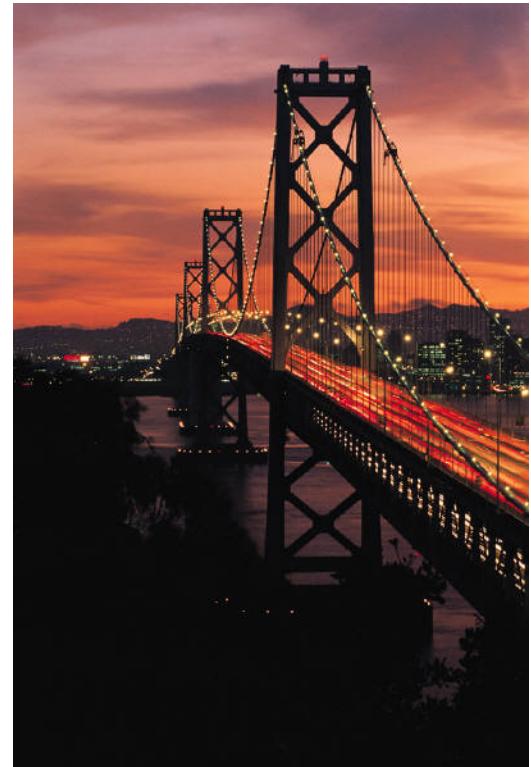


July & August 2011
California Edition

A CALIFORNIA ICON

When you think of California, what comes to mind? The beaches? The mountains? The fantastic weather? All the different things to do? There are so many truly unique aspects to life in the Golden State. We have icons all around us that make up our California experience. In our State, on the same day, one can see surf boards hanging out of a convertible, snow boards attached to a Prius, or wakeboards hanging onto motorboat. Our State is the home of a theme park where people come from all around the globe to see a larger-than-life mouse icon. Not only is our State famous for the iconic double-double animal style burgers, but even our industrial storm water permit is known nation-wide as a leader in water quality protection. When it comes to storm water, there is no bigger icon than the SWPPP itself. The SWPPP is the backbone of the storm water program and defines the storm water compliance program in the same way California is defined by its incredibly beautiful natural features and rich blend of cultures. In this edition of *The Rain Events*, we will take a closer look at this iconic document and review the important role it plays in our compliance programs.



“To Do List” for August:



- Print out new forms for the new storm water year. Need forms? You can download them from our website. Go to www.wgr-sw.com and look for “2011-2012 Forms” under the newsletter column.
- Perform the quarterly non-storm water observations sometime between now and September 30 (Forms 2 & 3).
- Review your facility’s SWPPP.



FIVE PHASES FOR DEVELOPING AND IMPLEMENTING INDUSTRIAL STORM WATER POLLUTION PREVENTION PLANS

The Industrial General Permit specifies the following five-step process for developing and implementing a SWPPP:

1. PLANNING AND ORGANIZATION

Before you prepare or revise a SWPPP do some homework. And remember, you don't have to have all the answers, you can surround yourself with other team members who can collectively help you plan out a pollution prevention strategy that will have a better chance to succeed.

- Form a Pollution Prevention Team - The SWPPP is meant to be a group effort. Individuals from different work areas should collaborate in the overall pollution prevention plan.
- Review other plans – Take a look at other relevant compliance plans such as the Spill Prevention Control and Countermeasures (SPCC) Plan; the Hazardous Material Management Plan; the Hazardous Waste Contingency Plan; and other such documents. Why reinvent the wheel? Much information required in the SWPPP is already contained in other documents which can be cross-referenced.

2. ASSESSMENT PHASE

Put the following items to paper:

- Develop a site map (see the last edition of *The Rain Events*);
- Identify potential pollutant sources;
- Make an inventory of materials and chemicals;
- List significant spills and leaks (since April 17, 1994);
- Identify non-storm water discharges (authorized and unauthorized); and
- Assess pollutant risks.

3. BEST MANAGEMENT PRACTICES IDENTIFICATION PHASE

Identify existing and proposed BMPs including the following:

- Non-structural BMPs – According to the permit, “Non-structural BMPs generally consist of processes, prohibitions, procedures, schedule of activities, etc., that prevent pollutants associated with industrial activity from contacting with storm water discharges and authorized non-storm water discharges. They are considered low technology, cost-effective measures. Facility operators should consider all possible non-structural BMPs options before considering additional structural BMPs.” (*Editor’s note: The term “non-structural BMP” no longer has the above connotation in the storm water community, but now refers to volume-reducing infiltration methods.*)
- Structural BMPs – include structural devices such as overhead covering, secondary containment structures, retention ponds, control devices such as segregating storm water and wastewater by berms and separate sewer systems, and treatment control measures.

- Select activity and site-specific BMPs – identify a mix of BMPs that best suit the unique features of your facility.

4. IMPLEMENTATION PHASE

The SWPPP plan does no good unless it is implemented. Implementation includes the following:

- Train employees on the BMPs, their purpose, and how to implement and maintain them;
- Implement the BMPs (actually do what your SWPPP says you are doing!); and
- Conduct recordkeeping of what BMPs have been implemented and how they are maintained.

5. EVALUATION / MONITORING

Assess your SWPPP program! It is meant to be evergreen and to change as conditions change at your facility. Annually ask yourself, how are the SWPPP and BMPs working? Are they effective in preventing pollutants from discharging with the storm water runoff?

- Conduct the annual comprehensive site compliance evaluation (ACSCE);
- Review monitoring information (as soon as it becomes available);
- Evaluate BMPs (are any new or additional BMPs needed?); and
- Review and revise the SWPPP (keep it current with changes at the facility).

Draft Industrial Permit Update

A July 28, 2011 email from the State Water Resources Control Board stated the following:

"State Water Board staff are working on a new draft of the Industrial Activities Storm Water General Permit (IGP) based on the comments received on the January 28, 2011, draft IGP. We plan to release the new draft IGP before September 1, 2011. We will post the new draft IGP along with a hearing notice prior to September 1, 2011, at the following web site:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/indstpermits.shtml

At this time we anticipate that the State Water Board will schedule a hearing for the new draft IGP in October or November of 2011.

Please be advised that State Water Board staff may not discuss the proposed revisions until the new draft is published."

Industry groups are organizing to fight off the aggressive changes being proposed in the Industrial General Permit renewal. For more information on these efforts, check out the following websites:

www.stormwaterCosts.com

http://www.calchamber.com/Headlines/Pages/08112011-StormWaterPermitFeeHikeDraftRulesNewEconomicLiabilityforEmployers.aspx?sp_rid=MzAyNTU2MzM5MQS2&sp_mid=36911604



We Have a June Contest Winner!

Kirk Lund submitted the winning answer!

The question was:

What does the acronym “SMARTS” stand for according to the State Water Resources Control Board?

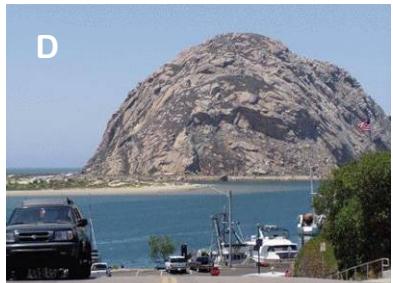
Storm Water Multiple Application and Report Tracking System

Kirk will receive a \$25 eGiftCard to  to buy some hiking equipment to see some of California’s great icons.



Famous SWPPP Facts

How well do you know California’s icons? Well, let’s see if you are a native or a transplant. Where can following pictured locations be found in California? (If you don’t know, email me and ask for the answers.)



You may or may not be an expert at California landmarks, but let’s test your knowledge on permit requirements for your SWPPP. (Answers can be found in the Industrial General Permit, Section A.)

- The SWPPP shall be retained _____ (**where**) and made available upon request of a representative of the Regional Water Board and/or local storm water management agency.
- The _____ (**who**) may notify the facility operator when the SWPPP does not meet one or more of the minimum requirements.

- The SWPPP shall be revised, as appropriate, and implemented _____ (**when**) which (i) may significantly increase the quantities of pollutants in storm water discharge, (ii) cause a new area of industrial activity at the facility to be exposed to storm water, or (iii) begin an industrial activity which would introduce a new pollutant source at the facility.
 - The _____ (**what**) shall be revised and implemented in a timely manner, but in no case more than 90 days after a facility operator determines that the SWPPP is in violation of any requirement(s) of the General Permit.
 - The SWPPP is considered a report that shall be available to _____ (**who**) by the Regional Water Board under Section 308(b) of the Clean Water Act.
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July-August STORM WATER CONTEST

Try it out! You can win!

By August 31, submit a response for the following question by email to jteravskis@wgr-sw.com.

According to the Industrial General Permit,
what are the two “major objectives” of the SWPPP?

All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift card to  .



Please contact us if you have any questions ...

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Technical Questions about Storm Water Compliance?
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