

Remember finals week and all of the studying, cramming, and trying to get the final term papers turned in to the professor? It was a week to show how much you learned and what you did during the year. Your grade for the course depended hugely on how well you did on those final reports and exams. So it is with the storm water year, the month of June is Final Exam Month. It is the month we are scurrying about rounding up our inspection reports and lab data to use in the preparation of the Industrial General Permit annual report. For many of us, this is the only time each year that the Regional Water Quality Control Board will “view” our facility by which our compliance program will be graded. So it is vitally important we accurately and thoroughly complete the report. We don’t want to get a follow-up email from the State saying that our report was incomplete or inadequate. In this month’s edition of *The Rain Events*, we will focus on the annual report preparation. We will give you tips from the experts; discuss report submittal options; and cover the do’s and don’ts of preparing annual reports. Don’t do what many school kids do and wait to the night before to cram for the exam. **The annual report is due July 1**, so get started on it now.



Items needed to prepare the Annual Report:

- Monthly Inspection Reports
- Quarterly Non-Storm Water Inspection Reports
- Analytical Laboratory Reports (two samples per outfall)
- Results of the Annual Comprehensive Site Compliance Evaluation
- The State’s MS Word template or access to their on-line reporting tool (SMARTS)



We Have a **May** Contest Winner!

George Alvarez submitted the winning answer!
The question was ...

**What are the benchmark values for the following?
1) pH 2) Total Suspended Solids & 3) Oil & Grease**

The correct answer is: pH: 6-9; TSS: 100 mg/l (ppm); O&G: 15 mg/l (ppm)

George wins a \$25 e-gift card to  to celebrate submitting his Annual Report on time.

Correction to Last Month's Newsletter Article

OK, we have been known to make mistakes and you can't believe everything you read. Last month, we said that in Region 4, the Los Angeles Regional Water Quality Control Board, dischargers have to submit reports **electronically**. While that is still true, we were wrong in stating the reports had to be submitted through SMARTS. Here is an email we received from the Los Angeles Regional Board after we did some more checking:

Mr. Teravskis,
Due to our (LA Regional Board's) new Paperless Office Policy, electronic submission is required. You have to submit your annual report either via our online system, SMARTS (<https://smarts.waterboards.ca.gov>), or via email (losangeles@waterboards.ca.gov) as a PDF attachment.

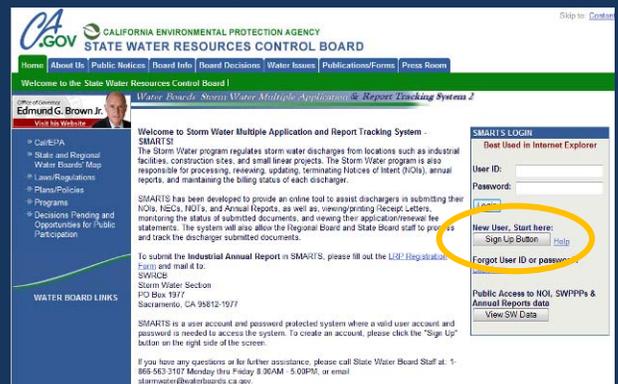
Submission through SMARTS is not requirement yet but it will be once the new Permit is adopted. Therefore, we strongly recommend you to start using SMARTS this time so that you can get used to the system in advance.

If you have any questions, feel free to contact me.

Thank you,
Harumi Goya
Engineering Geologist
Storm Water Compliance & Enforcement
Los Angeles Regional Water Quality Control Board
(213)620-2283

Correction: Attention Permittees in the Los Angeles Region

The Los Angeles RWQCB still requires all reports and submittals to be filed electronically, which can be emailed as a pdf or prepared on SMARTS. But, they strongly encourage using the State's SMARTS system. To use SMARTS, the facility manager must sign up on SMARTS as a "Legal Responsible Person" (LRP). To sign up, go to: <https://smarts.waterboards.ca.gov> and sign up as a new LRP user. Don't forget to link your data entry persons, who also must sign up for SMARTS accounts.





What to do, when the data is just not there ...

We have been preparing annual reports for long enough to know that we do not live in a perfect world. Even when the facility has the best of intentions to do an exceptional job at documenting all of the inspections and perform the required sampling ... stuff happens. The guy, who was trained to sample and had been handling it flawlessly, quits on you. You were too busy giving CPR to your business when those storms came in and did not have the time or even the presence of mind to sample them. Or, you just bought the company, and had no clue about the Industrial General Permit requirements. Although none of these excuses are valid in the State's eyes, we still understand that it can happen. So, now it is Annual Report time and you have "gaps" in your data, or maybe no data whatsoever. What do you do? What can you do? Well, here are some tips on filling in the gaps and minimizing non-compliance in the Annual Report.

1. First and foremost, be honest and have integrity in your reporting. Over the years, there have been many reports we have submitted on behalf of our clients to the Regional Boards out rightly admitting they blew it and identifying what steps the facility was taking to make sure it doesn't happen again. In the explanation page, which is required for any missing data, we explain exactly what happened and the corrective steps the facility is taking or has taken. These steps can include designating and training several specific persons (a primary person and a couple of backups) to do the inspections and sampling; creating written procedures for sampling and inspections; hiring an outside consultant to do the work; or making changes to the facility to make the inspections and sampling more easy to accomplish (i.e. installing automated sampling equipment, sample ports, or an easy-to-open sample hatch).
2. Never lie or fabricate data. It won't work and if you get caught, you will pay for it dearly; including potential civil and criminal penalties.
3. Try to "re-create" the inspection reports using other available documents or resources. Now, I didn't say fabricate the data! But, see if there are other inspection reports, like a daily facility inspection form completed by operators or maintenance staff. There may be enough information on these forms to help recall the conditions present at the time. This method usually works nicely for quarterly non-storm water inspections, but, admittedly, is not usually adequate for monthly storm water inspections.
4. Use on-line weather data resources if you are trying to identify if there were any "qualifying storm events" during a particular month. (Such as <http://www.ncdc.noaa.gov/oa/ncdc.html>.)
5. Perform your Annual Comprehensive Site Compliance Evaluation (ACSCE) now before June 30. You will need it on Form 5 of the of the hard copy report or under the "Evaluation" tab on SMARTS.
6. Gaps or no gaps, submit something by July 1! Having a late report just compounds the problem.

Although we nor anyone with the State will guarantee that you will not be fined for non-compliance, we have noticed the State will generally work with and extend grace to those whom they see are trying to do the right thing. Of all the reports we have submitted admitting to gaps but identifying the corrective action, we have yet to hear about one resulting in a monetary fine. That is not to say it won't happen; so, the wisest thing to do is to bring your program back into compliance. July 2nd would be a good date to start training personnel on what is required by the Industrial General Permit. One good way, would be to sign them up for this free newsletter which provides monthly reminders and helpful tips for what they need to do.



“To Do List” for June:

- Make sure the 4th Quarter Non-Storm Water Observation was performed (Forms 2 & 3 by June 30).
- Perform the Annual Comprehensive Site Compliance Evaluation (Form 5).
- Prepare and submit the annual report by July 1.

June Storm Water Contest

Try it out! You can win!

By June 30, 2012, submit a response for the following question by email to jteravskis@wgr-sw.com.

What is the best thing to do during the summer months with your storm water compliance program? (multiple choice)

- Do nothing. Go on vacation.
- Check your outfalls everyday for storm water discharges.
- Seal the storm drain inlets with plastic sheeting, review / revise the SWPPP, and train employees.

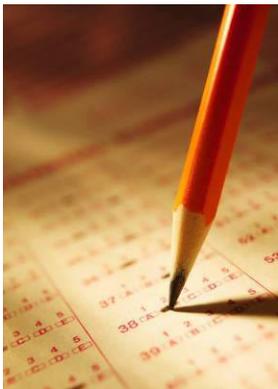


All persons submitting the correct answer will be placed in a drawing. The winner will receive a gift card for \$25 to 

Need help getting your annual report in at the last minute?

WGR will prepare your Annual Report for the low cost of **\$350**.

Contact Aaron Ortiz at aortiz@wgr-sw.com. Reports can be either completed on SMARTS or using the State's MS Word file. Completed reports will be emailed to the designated contact person for the facility. It will be the responsibility of the facility to certify and submit the report to the State. Offer does not apply to prepaid compliance programs.



Please contact us if you have any questions ...

Rain Events Newsletter Editor:

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Technical Questions about Storm Water Compliance? Call ...

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John Teravskis, jteravskis@wgr-sw.com, (209) 649-0877
John Ripley, jripley@wgr-sw.com, (310) 629-5259



June Special
\$15.00
Silt Sifter Bag



The patented dual-component, bag-within-a-bag design, Silt Sifter Bag is the original cushioned sediment control device incorporating materials specifically chosen for both filtration and high-flow performance.

Specs:

- Outer Material - High density polyethylene - Poly thread (4) lock stitching
- Filtering Media - Pine Wood Excelsior
- Rock Bag - High density polyethylene - Poly thread (4) lock stitching
- Dimensions - 30"L x 16"W x 6"H
- Durability - 500 lb. burst strength
- **Rock not included**

...Just Add Rock

BMP OUTLET'S
Product Spotlight



Universal Spill Bucket is a convenient, all in one bucket spill kit. The bucket is a UN rated screw top pail. The screw top allows not only easy access, but also provides you the confidence that the bucket is completely close and sealed. The contents of the spill bucket include approximately 2.5 gallons of granular absorbent, 6 universal spill pads, 1 universal absorbent soc, and two 2.5 mil, 18 gallon waste bags. One of the features of BMP Outlet's Universal Spill Bucket that sets it apart from other spill kits is that Personal Protective Equipment (PPE) is included with each spill bucket. Pair of clear safety glasses and nitrile gloves is included. For easy access in the event of spill the glasses and gloves are sitting on the top of the bucket when opened.

- Absorbs up to 5 gallons;
- UN Container 1H2/Y25/S;
 - Screw top lid;
 - Contents identified on easy to read label;

Contents include:

Approximately 2.5 gallons of granular absorbent, 6 Universal Spill Pads, 1 Universal Soc, Safety Glasses, Nitrile Gloves (Powder-free) and 2 Disposal Bags

Hornet's Nest Drain Inlet Filter



Starting at \$45.00

A unique, under-grate storm drain filter. The oversized base allows the filter to be used with a variety of size and shape drain inlets. Simply insert the filter, place the grate into place and trim the excess material for a custom fit and clean appearance. The yellow webbing secures the filter to the grate and doubles as lifting straps to quickly and easily remove the filter, grate and all, for simple cleaning. The sediment collection cone has 4 overflow portals to ease congestion during heavy storm events.

- Material - 8 ounce non-woven geotextile
Strapping - Weather resistant 2" polypropylene webbing
Flow Rate - 90 gpm/ft
Dimensions - 48" x 36"



Visit us at www.bmpoutlet.com