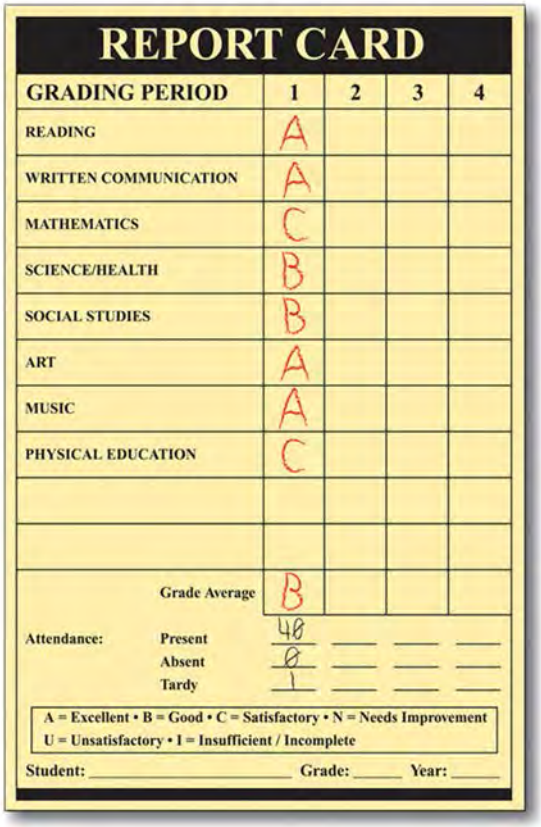
August 2016

The Monthly Dirt

A Monthly Newsletter on the California Construction General Permit
By WGR Southwest, Inc.



REPORT CARD

GRADING PERIOD	1	2	3	4
READING	A			
WRITTEN COMMUNICATION	A			
MATHEMATICS	C			
SCIENCE/HEALTH	B			
SOCIAL STUDIES	B			
ART	A			
MUSIC	A			
PHYSICAL EDUCATION	C			
Grade Average	B			
Attendance: Present	48			
Absent	0			
Tardy	1			

A = Excellent • B = Good • C = Satisfactory • N = Needs Improvement
U = Unsatisfactory • I = Insufficient / Incomplete

Student: _____ Grade: _____ Year: _____

Time to Give an Account

OK … I know that report cards are done a little differently today. But, do you remember physically bringing home the report card to Mom and Dad? Do you recall the feeling of anxiety if your performance was less than what your parents knew you were capable of? Do you remember the pride you felt when it contained A's and B's? Like those school years, there comes a time when construction operators must give an account of their compliance performance. This is through the Annual Report. The State Water Board does issue "grades", but it will use the report to evaluate how well the construction operators complied with the Construction General Permit (CGP). Just like there was trouble when Mom and Dad saw grades that were less than your potential – so also there may be some negative repercussions for areas of non-compliance or Numeric Action Level (NAL) exceedances that were not properly addressed during the storm water year. In this edition of The Monthly Dirt, we will look at the annual reporting process and give some suggestions in how to improve your

Reporting Process – The Annual Report is due on **September 1** of each year or when submitting the Notice of Termination (NOT). The reporting period is July 1 – June 30. If a project lasts less than 90 days from the issuance of the NOI to the approval of the NOT, then no annual report is required by the Water Board. This is also true if the beginning or ending portion of the project is less than 90 days of the reporting year. For example, if a project starts on June 1st, then no report will be required on the next September 1st (for June 1 – 30) if the project is continuing. In this case, the annual report will be required either when the NOT is filed or on the following September 1st, whichever comes first. Likewise, if a project submits an annual report on September 1st and subsequently files the NOT on September 15, then no annual report will be required for July 1 – September 15.

The Annual Report is prepared and submitted on the State Water Board's SMARTS website:

https://smarts.waterboards.ca.gov

A common misconception is that it must be completed by a QSP or QSD. While it may be a good idea to have one of these individuals, who are familiar with the site, complete the report; it is not required. What is required is that the person completing the report must have a registered SMARTS user account as the Legally Responsible Person (LRP), Duly Authorized Representative (DAR), or Data Entry Person (DEP). They must also be linked on SMARTS to the project. The DEP can populate the report, but only the LRP or DAR can certify it. The Water Board recommends that Internet Explorer 11 be used when using SMARTS.

Reporting Method – There are actually two parts to the Annual Report. The first are the "Ad Hoc" reports. The word "Ad Hoc" is Latin meaning "*for this*" and is defined as "*formed, arranged, or done for a particular purpose only*". So, when applied to the CGP, the particular purpose is to report analytical results. An Ad Hoc Report must be completed and submitted on SMARTS for analytical testing performed during each qualifying rain event. This analytical testing may be the field testing of discharges for pH and turbidity; or it may also be the reporting of analytical laboratory test results for non-visible pollutant sampling. Risk Level 2 and 3 projects which have frequent discharges will have more Ad Hoc reports than Risk Level 1 sites. We recommend that permittees do not wait until the Annual Report time to prepare the Ad Hocs, because it can be a significant amount of work to populate all of the sampling results. Another reason not to wait, is because NAL exceedances must be reported within 10 days. We frequently see non-compliance in this area because dischargers wait until August to prepare their Ad Hocs and Annual Reports.

The second part is the Annual Report feature on SMARTS. The Annual report is divided into three "forms". "Form 1" reviews attributes of the CGP (following very closely to the risk level appropriate compliance items in Attachment C, D, and E). "Form 2" reports Non Storm Water Discharges (NSWD). "Form 3" reports a summary of Best Management Practices (BMP) deficiencies. Remember, deficiencies must start to be addressed within 72 hours of becoming aware of them. Ad Hoc reports are automatically incorporated on the "Daily Averages Summary" page. Finally, the Annual Report is required to be certified by the LRP or DAR. *MD*

Get SMART on SMARTS

Last month, the Water Board released a guidance manual for preparing Annual Reports on SMARTS. This 9-page document walks through the basics of preparing a report and is a good reference for anyone new to reporting. It can be obtained from the Water Board's website at:


STATEWIDE CONSTRUCTION GENERAL PERMIT

DISCHARGER'S GUIDE TO THE STORM WATER MULTIPLE APPLICATION AND REPORT TRACKING SYSTEM (SMARTS) DATABASE

ANNUAL REPORT

Water Boards

Last Revision July 25, 2016

http://www.swrcb.ca.gov/water_issues/programs/stormwater/docs/construction/cgp_annual_report.pdf

This document does not go into depth on Ad Hoc reports, but there is another guide available under the "help" tab on SMARTS that provides instruction on how to complete an Ad Hoc report for the Construction General Permit. The document can be accessed using the following link:

https://smarts.waterboards.ca.gov/smarts/help/ad_hoc.pdf

Raising the Grade

Just as a school student may want to raise their grade after getting a less than desirable report card, so a construction operator may realize that they need to do more to improve their compliance program after they see gaps in their annual report. If you find yourself in that predicament, here are some tips for "raising the grade" of your compliance program:

- ☑ Pay attention to NAL exceedances and respond in a timely manner. The best thing to do is to respond the day the sampling is being done. If possible, make corrective action that day, continue to sample, and see if the daily averages can be brought below the NAL levels for pH or turbidity.
- ☑ Begin to respond to BMP failures identified during inspections within 72 hours of noticing them.
- ☑ Improve documentation of daily and storm event inspections and quarterly non-storm water inspections.
- ☑ Do a better job of tracking storms and recording rain gauge levels.
- ☑ Review the CGP's Attachment A, C, D, or E, whichever applies to your risk level, and make sure you are fully implementing each of the required BMPs.
- ☑ Make sure that all required sampling (including non-visible pollutant sampling) is performed.

Want WGR to do your Annual Report?

Call (209) 334-5363, ext. 116

Upcoming Training

Got SWPPP? Classes coming to Lodi:

- ✓ QSP/QSD Training, October 25 - 27, 2016
- ✓ BMP Roundup for Municipal Inspectors, November 8, 2016 (Only City and County inspectors allowed! No contractors please.)

Need Professional Development Hours (PDHs) for your CPESC, CPSWQ, CESSWI, or CISEC?

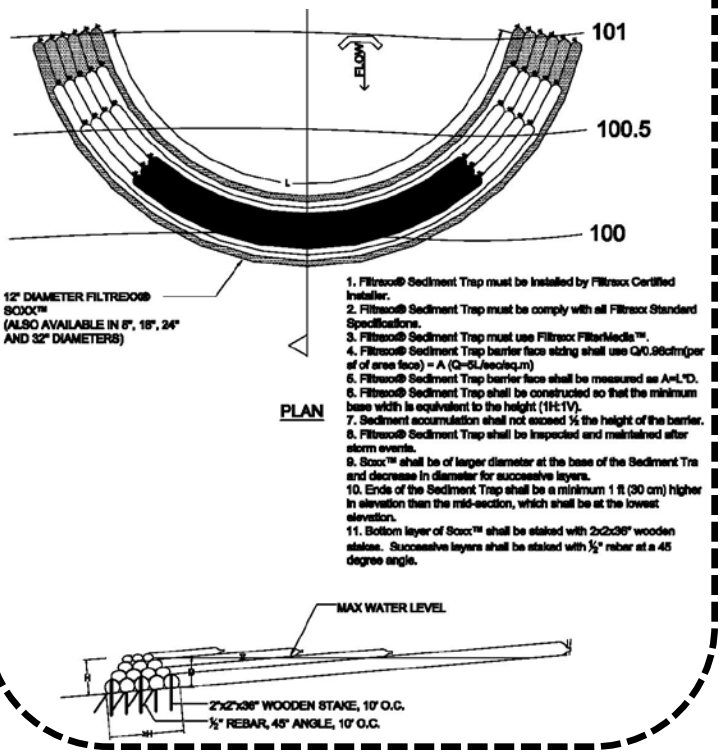
Get them FREE at www.PDUweek.org

BMP Toolbox Tip

Sediment Trap with Compost Socks

A sediment trap can be constructed using compost socks (such as the Filtrexx Siltsoxx.) These traps not only slow the flow and allow sediment to drop out, but they also will slowly release the water and filter it at the same time. This is a great tool for storm water and groundwater dewatering projects. For more information, go to:

http://www.filtrexx.com/application/files/6514/6169/7718/1.9_Filtrexx_Sediment_Trap.pdf



Please contact us if you have any questions ...

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Storm Water
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WHAT IS AN ACTIVE TREATMENT SYSTEM? WHEN IS IT NEEDED?

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What is an Active Treatment System?

An ATS is a temporary water treatment plant, operating in either flow through or batch mode. They are designed to correct pH and prevent the uncontrolled release of sediment laden stormwater from a construction site during wet seasons until it is in compliance with effluent limits.

When is an Active Treatment System really required?

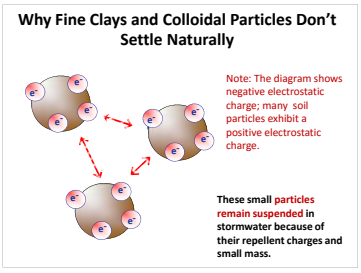
- When discharges cause an exceedance of water quality standards for turbidity and/or pH.
- When traditional Best Management Practices cannot effectively control the accelerated release of fine sediment in stormwater runoff.
- When site soils are made up of clays and/or colloidal clays.
- When the site exhibits highly erosive soil characteristics and terrain with long steep slopes.
- When site size limits construction of adequately sized holding basins.
- For more information see Attachment-F of the California Construction General Permit.

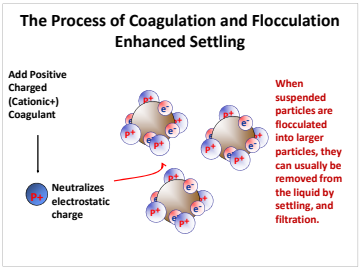
How does an Active Treatment System clean?

Negatively charged particulate matter with very small mass, can stay in suspension indefinitely without treatment. Particles of small mass and naturally repelling charges present challenging settling and filtration issues.

The addition of cationic (positively charged) coagulants, destabilizes the electrostatic charge and allows the small particles to bind together into larger aggregates called floc.

Chemically flocculated material will gravity settle and is more easily separated from the water through the use of clarifiers and mechanical filtration devices.





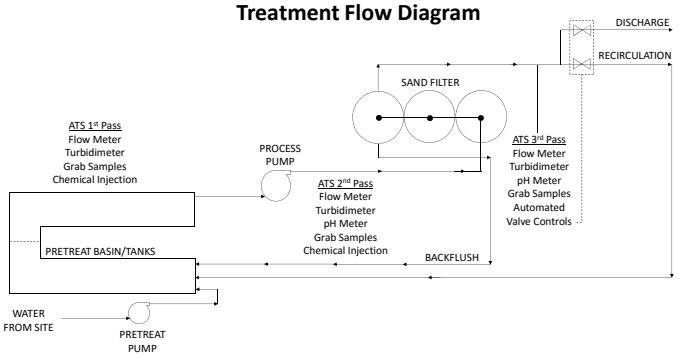
30 seconds after pretreatment. Coagulants can achieve within minutes what would normally take hours or years to accomplish with settling alone.

Poor quality stormwater runoff negatively impacts the environment and project budgets. A mess like this can cost up to $10.00 per gallon of discharged water in fines levied by a California Regional Water Quality Control Board.

Active Treatment System design considerations include:

- Site characteristics: Acreage, Location, Historical Rainfall, Soil Types
- Expected water volumes and flow rates
- Expected turbidities from benchscale testing
- Contact time for suspended solids to fall out
- Tank or basin sizing (storage, pre-treat, backflush)
- Best Management Practices (BMPs)

Treatment Flow Diagram

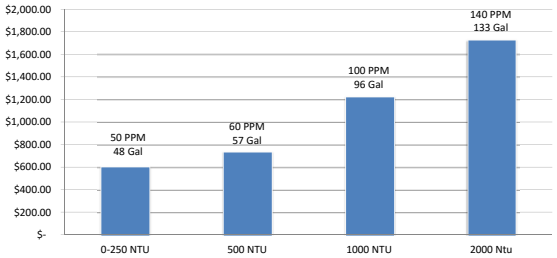


ATS Control Unit

Budgeting for Chemical Treatment

- Mobilization/Demobilization
- Monthly Rental
- System Operations
- Consumables

Estimated Polymer Cost to Treat 1,000,000 Gallons



What have we learned about reducing costs?

- Best Management Practices (BMP's) are a must.
- Controlling turbidity prior to Active Treatment is crucial.
- Instituting green technology such as Active Treatment is relatively inexpensive compared to potential fines.

Active Treatment Systems, Inc.
WATER SOLUTIONS FOR THE ENVIRONMENT

6301 Angelo Court, Suite 9
Loomis, CA 95650
916-652-9745

20 Jetty Dr., Unit A
Newport Beach, CA 92625
949-478-0945

ats-env.com

PRODUCT SPOTLIGHT

Our **D-Watering Bags** are effective devices for separating sediment from pumped water. Made from heavyweight, non-woven geotextile fabric, **D-Watering Bags** are a snap for filtering solids and sediments out of your water. The input sleeve is designed to accomodate several hose diameters. Securing the bag to a hose is quick and easy, using the heavy-duty webbing and d-rings that are sewn to the sleeve. To maintain uniform integrity, each **D-Watering Bag** is sewn with a 4-thread lockstitch hem, and an additional perimeter lockstitch sewn with high strength, marine-rated poly thread.

D-Watering Bags are available in three sizes: 3'x4', 4'x6', and 6'x9'.

Product Specifications:

- Material: 8-ounce non-woven geotextile
- Strapping: Weather-resistant 2" polypropylene webbing
- Available Sizes: 3'x4', 4'x6', 6'x9'

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