

The Monthly Dirt

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

The Uh-Oh Sampling

The Construction General Permit contains a sampling requirement common to all risk levels of traditional and LUP projects. Non-Visible Pollutant Sampling, sometimes referred to as “**Uh-Oh Sampling**”, is not entirely new to the current Construction General Permit. Many are surprised to find out that there was a similar requirement in the former permit. The current permit requires the following:

- Collect one or more samples during any breach, malfunction, leakage, or spill observed during a visual inspection which could result in the discharge of pollutants to surface water that would not be visually detectable in storm water;
- Collect samples at all discharge locations within the first two hours of discharge from rain events that occur during business hours which generate runoff;
- Collect a sample of storm water that has not come in contact with the disturbed soil or materials stored or used on-site for comparison with the discharge sample; and
- Analyze the samples for all non-visible pollutant parameters indicating the presence of pollutants identified in the pollutant source assessment section of the SWPPP.



So, it is clear that this sampling is triggered by some sort of mishap (uh-oh) at the project. But, we find there is still quite a bit of confusion about this sampling. In our experience, we estimate that well under 10% of the projects perform even one non-visible sampling during their entire project duration; but we estimate that 90% or more of all projects have multiple non-visible sampling triggers. Hoping to shed some light on this topic and bring a little more clarity to it, we interviewed Annalisa Kihara who is a Water Resource Control Engineer with the State Water Resources Control Board's Storm Water Unit.

Monthly Dirt: *According to the CGP, non-visible sampling is required of all permittees during any breach, malfunction, leakage, or spill observed during a visual inspection which could result in the discharge of pollutants to surface water that would not be visually detectable in storm water. There is a wide variety of potential triggers ranging from a few drops of oil or grease to a 500-gallon spill of diesel. In actuality, what type of spill or upset should trigger non-visible sampling?*

Annalisa: Any activity where there is the potential for a non-visible pollutant discharge should trigger monitoring. Because “potential” is a subjective term, we look to well trained QSPs to determine when non-visible sampling is necessary.

Monthly Dirt: *What if the spill or mishap occurs during July and the next rain event doesn't happen until November?*

Annalisa: Sampling must occur during the next rain event regardless of the duration in between.

Monthly Dirt: *What is meant by the phrase “could result in the discharge of pollutants”? If the “mishap” was fully remediated would non-visible sampling still be required?*

Annalisa: As previously mentioned, this goes back to the QSP determining the “potential” for a non-visible pollutant discharge.

Monthly Dirt: *There is probably not a single construction project that has not had some sort of "mishap" triggering non-visible sampling, yet our observation is that very few, perhaps well under 10% of projects, have performed sampling. What is your feel on the level of compliance with this non-visible sampling requirement?*

Annalisa: Compliance can be difficult and inconsistent depending on the QSP for the project. Some QSPs may interpret "potential" more stringently while others may not.

Monthly Dirt: *When can non-visible pollutant sampling be discontinued? Is it a one-time only event for each mishap?*

Annalisa: Non-visible sampling is a one-time only event after the breach, malfunction, spill, or leakage is identified. The most effective sampling time is during the "first flush". This is why the permit requires collection within the first two hours of a rain event producing discharge.

LUPs vs. Traditionals?

As we have often noted, it appears that the LUP lobby scored another win in this permit when it comes to Non-Visible Pollutant Sampling. Let's compare / contrast the slightly differing requirements for these two types of projects.

Sampling Triggers:

LUPs – not required to sample if "the site is cleaned of material and pollutants and/or BMPs are implemented prior to the next storm event."

Traditionals – shall collect a sample after a "breach, malfunction, leakage, or spill". There is no mention of an exclusion for cleaning up the problem.

Sample Locations:

LUPs – to be collected "down-gradient from the discharge locations where visual observations were made triggering the monitoring".

Traditionals – must "collect samples at all discharge locations".

Constituents Analyzed:

LUPs – "Analyses may include, but are not limited to, indicator parameters such as: pH, specific conductance, dissolved oxygen, conductivity, salinity, and total dissolved solids."

Traditionals – "shall analyze samples for all non-visible pollutant parameters ... identified in the pollutant source assessment" in the Construction Site Monitoring Plan section of the SWPPP.

Upcoming Training ...

- Next Got SWPPP? Class to be held in Lodi, CA:
 - ✓ QSD/QSP Class – April 9 – 11, 2013
 - ✓ Need PDUs for CESSWI or CPESC? PDU Week coming in May 20-24, 2013 (see below)

For more information or to register for a class go to www.gotswppp.com

The State's New pH Averaging Tool

The Water Board has provided some guidance and a tool on calculating the pH average. You can download their Excel spreadsheet tool at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/bulletin_2013_1att.xlsx

They have also prepared a technical bulletin on pH averaging that can be downloaded at:

http://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/bulletin_2013_1.pdf

Coming May 20 - 24

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Please contact us if you have any questions ...

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Technical Questions about Environmental Compliance?

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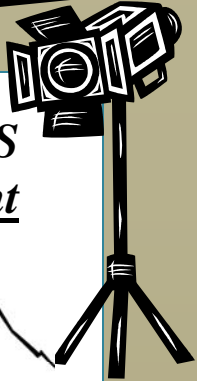
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March Special

Hornet's Nest Drain Inlet Filter



\$40 (Bag Only) or \$50 (w/ Oil Pillow)

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.

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