

REVISION IN THE INDUSTRIAL GENERAL PERMIT

A recent conversation between the editors of *The Rain Events* and the Central Valley Regional Water Board unearthed a surprising piece of information – the Water Board referenced a significant revision in Attachment D, Section D of the Industrial General Storm Water Permit (usually shortened to General Permit or IGP) concerning the deadline of submitting Permit Registration Documents, or PRDs. The Water Board changed the original deadline of January 1, 2015 to July 1, 2015 – the effective date of the new General Permit (2014-0057-DWQ). But while this amendment should make your holiday season much less stressful, this is no time to kick back and relax. *The Rain Events* discussed this change of events with industry expert Aaron Ortiz, and while he is relieved to have extra preparation time, he strongly cautioned against waiting until the last minute to submit your Permit Registration Documents.

A Brief Refresher

Are you drawing a blank on what Permit Registration Documents mean for your project? In our discussion with Aaron, he explained a little about PRDs. PRD is an acronym for **Permit Registration Documents**, a collection of forms that must be submitted to the State Water Board to obtain or renew General Permit coverage. There are two types of coverage that can be obtained under the IGP: Notice of Intent coverage, and No Exposure Certification. Each route has a different list of required Permit Registration Documents. For those seeking the more common NOI coverage, there are three PRDs required – a completed Notice of Intent form, a finished SWPPP, and a site map (submitted separately from the SWPPP). All three of these documents must be submitted to the State through the online SMARTS database. If your project qualifies for a No Exposure Certification, there are three PRDs you must submit coverage – a completed NEC form and checklist, and a site map. Again, all three of these documents must be submitted through SMARTS.

When do these documents need to be submitted?

According to the Water Board, the new deadline for submitting your PRD documents for NOI coverage is **July 1, 2015**. The deadline for NEC coverage is a few months later on October 1, 2015. However, Aaron emphasized the need to submit your PRDs before the July 1 deadline, even if you are applying or reapplying for NEC coverage. If for some reason you are not able to submit your NEC Permit Registration Documents before the July deadline, we recommend obtaining NOI coverage until you receive No Exposure Certification status. The new General Permit addresses existing NEC permittees, not NOI permittees transitioning over to NEC coverage for the October 1, 2015 deadline. For that reason, Aaron asserts that it is best to submit your NEC PRDs before July 1, just to be safe.

Who is responsible for submitting the PRD documents?

The project's Legally Responsible Person, or LRP, is responsible for seeing that the Permit Registration Documents are completed and submitted to the State before the deadline. Aaron stressed that while the project manager or LRP may hire a consultant to help prepare the PRDs, it is still ultimately the LRP's responsibility to ensure these documents are submitted on time.

For Those Recertifying

All projects must have a SMARTS account in order to apply for permit coverage. For existing permittees, you still need to submit your Permit Registration Documents before the July 1 deadline, unless you are applying for NEC coverage. Because the new version of the IGP becomes effective on July 1, you will most likely need to update your SWPPP to reflect the requirements of the new General Permit. *Continued on next page.*

Attention New Permittees!

If this is your first time applying for permit coverage, Aaron recommends that you apply for current NOI coverage under the current IGP permit, even if you are pursuing NEC status. He explained there are less requirements for existing permittees than there are for new permittees under the new IGP, and there is no reason for subjecting yourself to additional requirements that current permittees do not have. However, make the most of your efforts by developing your SWPPP ahead of time to meet the new General Permit standards, You will then be ready to apply for the new IGP permit when the time comes.

Conclusion

So while the “extended” deadline may allow you some breathing room, don’t allow yourself to get too comfortable; July will come quicker than you realize. And definitely don’t wait until the last minute – start the process of preparing your Permit Registration Documents now. Aaron warns against allowing the online SMARTS application to deceive you – it usually takes much longer to fill out than you would expect. Finally, remember that while many consultants would gladly assist you in preparing your Permit Registration Documents, there is only one person ultimately responsible for making sure these documents are completed and submitted on time – the project LRP ☔

Get SMARTS

SMARTS is an online database that was developed to assist dischargers in submitting a variety of documents and reports to the State of California. If you don’t have a SMARTS account, it’s time to get one! This is not something that can be postponed. If you are attempting to get coverage under the new IGP, file a NOI or a NOT, or reapply for NEC coverage, you must use the SMARTS database.

The SMARTS system can be conveniently accessed by going to smarts.waterboards.ca.gov.

Listen to an interview on SWPPP Radio with Aaron Ortiz as he discusses the SMARTS system:



<http://www.wgr-sw.com/podcasts/>

“To Do List” for October:



- ☂ Sample the first or second qualifying storm event if you have not yet done so. Get the observation and sampling forms ready. Prepare your sample kits.
- ☂ Perform and document your monthly storm water inspections (Form 4).

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Stormwater Industrial General Permit 2015 Workshops

Workshop Dates	What is the workshop about?
Santa Rosa 3/4/2015 4/6/2015	<p>The new National Pollutant Discharge Elimination System (NPDES) Permit for storm water associated with industrial activity is effective July 1, 2015. Come to one of the Water Board Sponsored workshops where staff will present the new requirements in the permit that impact your industrial facility operations.</p> <p>Key topics at the workshops:</p> <ul style="list-style-type: none"> -How to enroll in the new permit -What are the changes in the new permit -What is the schedule for the new permit -A question and answer session <p>REGISTRATION IS REQUIRED due to the large number of participants we expect. For more information please visit our website:</p> <p>http://www.swrcb.ca.gov/water_issues/programs/stormwater/industrial.shtml</p> <p>Receive email updates on Industrial Storm Water program go to our program page, click on Subscribe online . click on Water Quality Topics then select Storm Water Industrial Permitting issues enter your email and hit subscribe!</p>
Oakland 2/20/2015 3/17/2015	
San Luis Obispo 2/11/2015 4/8/2015	
Los Angeles 2/2/2015 3/9/2015	
Sacramento 1/16/2015 3/20/2015	
Fresno 1/26/2015 4/14/2015	
Redding 1/23/2015 4/23/2015	
Tahoe 2/18/2015 3/18/2015	
Victorville 2/3/2015	
Palmdale 3/10/2015	
Brawley 2/5/2015	
Coachella 3/12/2015	
Rancho Cucamonga 2/26/2015 3/26/2015	
San Diego 2/6/2015 3/24/2015	

Please contact us if you have any questions ...

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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 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, the question was ...

How many storm water samples are required to be collected from each outfall between now and June 30, 2015?

Larry Eshelman submitted the winning answer! The answer is that **two storm water samples** must be collected from each outfall before June 30, 2015.

Larry wins a \$25 gift card to In-N-Out Burger to treat his sample collectors to extra-crispy animal-style fries.

This Month's Contest Question ...

How often do you need to recertify for NEC coverage?

By December 5, 2014, submit your response to the above question by sending an email to stevaskis@wgr-sw.com. All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift card to Applebee's.



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