

Qualified Industrial Storm Water Practitioner

As part of a holiday celebration, a daycare employee working with second and third graders had been trying to get the children into a straight line to run a race. Finally, after several minutes and great effort she was able to settle the kids down. She was about to explain to the kids the race course, where the finish line was and the prize for the winner when the mischievous head of the daycare walked up and shouted, to the employee's surprise, "Ready...Set...Go!" Well as you can imagine, the kids took off running in all different directions none of them knowing where to run and where the finish line was; some kids declared themselves the winner not knowing if they actually finished the race. You can imagine the exasperated daycare employee was not feeling the Christmas spirit that afternoon and I am sure the head of the daycare was put on Santa's naughty list. Many facility personnel under the current Industrial General Storm Water Permit (IGP), have been told, "Ready...Set...Go" and follow the IGP monitoring requirements but like those daycare kids they have no direction or guidance so their storm water monitoring program is scattered; some thinking they are in compliance only to find after a visit from a regulator or letter from the Regional Water Quality Control Board or worse yet, a letter from a third party litigator that they are not compliant (put on the naughty list) with IGP requirements; that would be a unpleasant start to the New Year.

In this issue of the "*Rain Events*" we will a look at the Draft IGP's Qualified Industrial Storm Water Practitioner (QISP) requirements which the State Water Resources Control Board (SWRCB) has put in the Draft IGP to assist permittees with understanding and complying with the Draft IGP storm water monitoring requirements (nice list). We will also take a look at what is going on with the QISP training development.

Under the current IGP, training is required to for "*personnel who are responsible for (1) implementing activities identified in the SWPPP, (2) conducting inspections, sampling, and visual observations, and (3) managing storm water.*"¹ The current IGP also gives general guidelines on what areas to address in the training. We have found over the years of performing storm water training that many areas of the current IGP that we train on are being heard for the first time by those we train even though they have been under IGP coverage for years and have had storm water training before.

In the Draft IGP findings section H, it states to "*improve compliance and maintain consistent implementation,*" with the Draft IGP requirements, permittees will be required to assign a QISP for each of their facilities under IGP coverage that have "*entered Level 1 status in the Exceedance Response Action (ERA).*"²

Industrial General Permit **DRAFT** Order

Permit, or seven (7) days prior to commencing operations, whichever is later, are ineligible to obtain coverage under this General Permit.

45. The California Ocean Plan prohibits the direct discharge of waste to ASBS. ASBS are defined in California Ocean Plan as "those areas designated by the State Water Board as ocean areas requiring protection of species or biological communities to the extent that alteration of natural water quality is undesirable."

46. The California Ocean Plan authorizes the State Water Board to grant an exception to Ocean Plan provisions where the board determines that the exception will not compromise protection of ocean waters for beneficial uses and the public interest will be served.

47. On March 20, 2012, the State Water Board adopted Resolution 2012-0012 which contains exceptions to the California Ocean Plan for specific discharges of storm water and non-point sources. This resolution also contains the special protections that are to be implemented for those discharges to ASBS.

48. This General Permit requires Dischargers who have been granted an exception to the Ocean Plan authorizing the discharges to ASBS by the State Water Board to comply with the requirements contained in Section VIII.B of this General Permit.

H. Training

49. To improve compliance and maintain consistent implementation of this General Permit, Dischargers are required to designate a Qualified Industrial Storm Water Practitioner (QISP) for each facility the Discharger operates that has entered Level 1 status in the Exceedance Response Action (ERA) process as described in Section XII of this General Permit. A QISP may be assigned to more than one facility. In order to qualify as a QISP, a State Water Board-sponsored or approved training course must be completed. A competency exam may be required by the State Water Board to demonstrate sufficient knowledge of the QISP course material.

50. A QISP is responsible for completing Level 1 status and Level 2 status ERA requirements as specified in Section XII of this General Permit.

51. A Compliance Group Leader, as defined in Section XIV of this General Order must be a QISP.

52. All engineering work required by this General Permit shall be performed by a California licensed professional engineer in accordance with the Professional Engineers Act (Bus. & Prof. Code § 6700, et seq.).

53. California licensed professional civil, industrial, chemical, and mechanical engineers and geologists have licenses that have professional overlap with the topics of this General Permit. The California Department of Consumer

Order 2013-XXXX-DWQ 8 July 19, 2013

To be QISP certified, a person will need to do the following:

1. Complete a SWQCB sponsored or approved training course;
2. Potentially pass a QISP exam;
3. Since California licensed professional civil, industrial, chemical, and mechanical engineers and geologists may have areas of expertise that coincide with QISP certification they can be QISP certified once they complete a specialized, self guided SWRCB sponsored registration and training program.
4. Complete the QISP certification process as outlined in section IX.A of the Draft IGP which states that once a person has met all the QISP training requirements, they will then need to “*registered as a QISP via SMARTS*” and the SWRCB will issue to the registrant “*a QISP identification number.*”

The role of a QISP extends beyond assisting facilities that entered ERA Level 1 status. If a facility wants to be part of a Compliance Group³, the Compliance Group Leader must be a QISP. However, the State is still determining what qualification process a Compliance Group Leader must undergo. Section IX.A of the Draft IGP also requires that if a permittee is in Level 1 status, their required storm water training must be performed by a QISP.

A QISP certified person is not limited to one facility but can be assigned to more than one facility.

¹ See IGP Order # 97-03-DWQ §A.8.a.v

² See July 19, 2013 Draft IGP Findings §M

³ See July 19, 2013 Draft IGP Findings §N



The Compliance Corner . . .

Industrial General Permit Training Team

Back in August 2012, Greg Gearheart with the SWRCB sent out an email announcing a special workshop in September 2012 to outline how the SWRCB planned to develop the Qualified Industrial Storm Water Practitioner (QISP) training. They requested interested parties including SWRCB staff, storm water permittees, and consultants to apply to volunteer their time to be part of committees comprised of the main committee (Industrial General Permit Training Team – IGPTT) made up of 15 members or be part of one or more sub-committees to assist the SWRCB with developing the QISP training.

Based on input from its members and sub-committees to make the training more economical, and flexible; the IGPTT is considering a training program that will be comprised of approximately 16 hours of online training and 8 hours of in class practicum by a trainer of record. The online training broken down into modules will allow QISP trainees to complete their online training at times when it is most convenient for them instead of requiring multiple days of in class training. An exam will be given after the on-line training is completed and then the trainee will participate in a one-day live practicum with a trainer of record.

“To Do List” for January:

- Sample the first or second qualifying storm event if you have not yet done so.

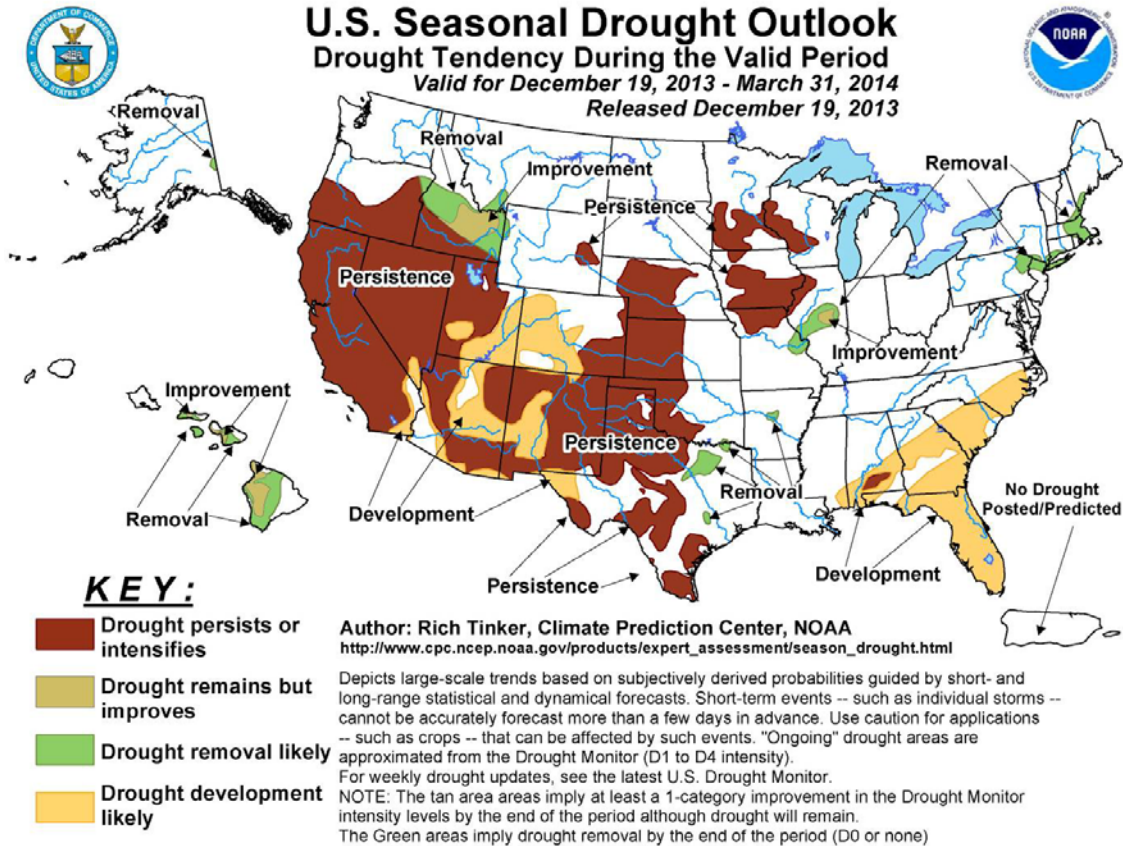


- Document the second quarter non-storm water observation you performed before the end of December 2013 (Forms 2 & 3).



Draft IGP News

The SWRCB has revised their projected adoption of the new IGP to March 2014 with the expected date to become effective July 1, 2015.



On December 19, 2013, the National Oceanic and Atmospheric Administration's (NOAA) [US Seasonal Drought Outlook](#) webpage¹ updated its drought estimates for the next few months. The website is predicting ongoing and "persist" drought conditions for the next three months.

In a supplementary article to the US Seasonal Drought Outlook webpage, NOAA's Rich Tinker wrote an article titled "[Discussion for the Seasonal Drought Outlook](#)"² in which he states:

For January, below-normal precipitation is favored from central and southern California southeastward into northeastern Arizona while surplus precipitation is more likely from central Idaho to the north and east, with neither extreme favored elsewhere. As a whole, the outlook for the first three months of the year has enhanced chances for deficient precipitation from New Mexico and western Colorado westward through the southern half of Nevada and the central and southern sections of California.

In light of these expected conditions, how should a discharger respond?

Well, to help answer that, we at [Rain Events](#) have a few recommendations:

1. If you have not yet had a qualifying storm event (during the months of October 1st – May 30th, preceded by at least 3 days with no discharge, produces enough precipitation to cause runoff, occurring within the start of or during regularly scheduled operating hours, and collected within an hour of discharge); be vigilant because section B.5 of the current IGP requires samples be collected from the first qualifying storm water discharge of the wet season.
2. If a second qualifying storm water discharge occurs; collect a sample. You are not guaranteed that another qualifying storm will occur this season, especially in light of the expected drought conditions.
3. Regularly inspect or perhaps add additional inspections of your BMPs to make sure they are ready for a storm. Consider reinforcing your regular BMPs with additional BMPs (additional housecleaning, added filtration) since we have had a long period without rain and may continue to have no rain, there may be a buildup of more than the usual potential pollutants in your drainage areas should a storm event occur.

¹ http://www.cpc.ncep.noaa.gov/products/expert_assessment/sdo_summary.html

² http://www.cpc.ncep.noaa.gov/products/expert_assessment/sdo_discussion.html

We Have a November Contest Winner!

Lisa Conduff submitted the winning answer!

The question was...

According to CFR 136 what is the official hold time for pH?

Answer: 15 minutes, as required in 40CFR136.3

The 15 minute hold time requirement has been in the last three drafts IGPs and is not expected to change once the Draft IGP is adopted.

Lisa wins \$25 at



Great job!



Still need your crew trained to take storm water samples, measure pH in the field, and do monthly observations?

WGR will come to your facility and provide a two-hour training session for **\$425**.

Appointments must be booked with aortiz@wgr-sw.com and facilities must be located within 30 miles of our Lodi or Los Alamitos offices. Discount pricing is also available for facilities farther than 30 miles, please contact Aaron Ortiz for more details. Offer does not apply to prepaid compliance programs.

December Storm Water Contest

Try it out! You can win!

By **January 31, 2014**, submit a response for the following question by email to steravskis@wgr-sw.com.

Question: What is the frequency of the storm water discharge observations required under the current IGP?

Please contact us if you have any questions ...

Rain Events Newsletter Editor:

John Teravskis jteravskis@wgr-sw.com
(209) 334-5363 ext. 110

**Technical Questions about Storm Water Compliance?
Call ...**

Aaron Ortiz, aortiz@wgr-sw.com, (209) 810-5151
Steve Teravskis, steravskis@wgr-sw.com, (209) 642-5020
Chelsea Dreyer, cdreyer@wgr-sw.com, (310) 629-5259



Those submitting a correct answer will be placed in a drawing for a **\$25** Applebee's gift card.

**We at Rain Events hope
you have a compliant and
prosperous 2014**