

The Rain Events

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

Storm Water Report Card

Are you old enough to remember coming home from school with that slip of paper summarizing how you did in school for the semester? Maybe you had mostly A's and B's or perhaps ... grades that were less than desirable of which you were not too anxious for Mom or Dad to see. Just as kids all over California will be reliving that same scenario this month, so will your facility be getting a "grade" for its performance over the last 12 months. Actually, each facility "grades" itself by reporting on the activities that it accomplished and the status of its compliance program. This month's edition of *The Rain Events* focuses on the Annual Report required by the Industrial General Permit.

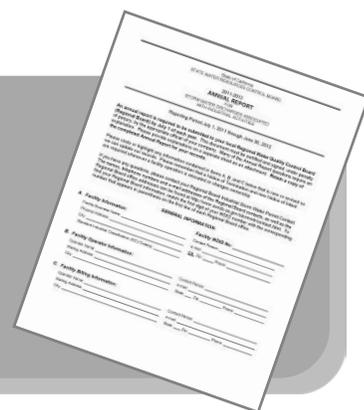
The Annual Report for Industrial General Permittees is due July 1 of each year and covers the time period of July 1st of the previous year through June 30th of the current year. In the report, the discharger will include information about the inspection and sampling activities as well as presenting a summary of the BMP performance and the facility's compliance program. The report can be prepared on a Microsoft Word or Adobe Acrobat template, or it can be entered directly onto the State's SMARTS website.

To get a good "grade" on this, don't be like some slothful students. Make sure that the report gets turned in on time. Every year many facilities have procrastinated for various reasons and missed the July 1 deadline. In past years, the Water Board issued a Notice of Violation that threaten fines if the report was not immediately turned in. However, please note that the Water Board was being generous in their notices and did not have to provide an extended window for the report submittals ... NOVs / fines can levied immediately for late submittals. A way to get a good "grade" is to thoroughly complete the report with all of the requested information; assuming the information is available. Holes in your monitoring program will be blatantly obvious in the Annual Report. For any missing information or inspections and sampling that was not conducted, on the explanation page provide a detailed explanation of why it was not performed and what was done to assure that the monitoring will be performed in the future. Another way to assure outstanding grades on this report, is to be able to support with documentation everything that a facility operator is affirming in the report. For example, in the section of the report on Annual Comprehensive Site Compliance Evaluations, it is real easy to just state "yes" to all of the questions being asked about your compliance program. However, we have often seen the Water Board staff or third party environmental organizations later require back-up documentation for each of the items reported in this section. An affirmative answer without supporting back-up does not ultimately get you a good grade.

Just as bringing home the report card for the diligent student is not a stressful event, likewise for the discharger who is prepared and implementing a proactive program, the Annual Report is a time to shine for a job well done rather than be nervous about poor performance.

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 or pdf template or access to the on-line reporting tool (SMARTS)



SMART Reporting

Tired of paper reports? Want to go electronic with this year's Annual Report? Try using the State's SMARTS system. SMARTS stands for Storm Water Multiple Application and Report Tracking System and is a website that the State will eventually use to track all of its NPDES permits. In the near future, all Industrial General Permittees will be required to use SMARTS for annual reporting. SMARTS can be accessed by going to:

smarts.waterboards.ca.gov/

However, before trying to use SMARTS, a facility must first complete the Legally Responsible Person Registration Form with information about the business owner, persons approved to certify the report (approved signatories), and persons approved to prepare the report (data submitters). The form can be downloaded by going to:

www.swrcb.ca.gov/water_issues/programs/stormwater/docs/lrp_registration.pdf

After the form has been submitted to the Water Board, the discharger will be sent an email that contains instructions on how to register for SMARTS, a secret code number (SCN), how to link WDID numbers, approved signatories, and data submitters to the account. Although this process happens fairly quickly, don't wait until the last moment to submit the form as the Water Board staff gets fairly busy as the July 1 deadline approaches.

Report FAQs

- 1. Where do I find the Annual Report templates?** The MS Word and Adobe Acrobat templates are found on the State Water Board's website at:
www.swrcb.ca.gov/water_issues/programs/stormwater/annualreport.shtml
- 2. Do I have to complete Form 1 or can I just include the laboratory annual reports?** Actually, you have to do both. Form 1 must be complete and the laboratory reports have to be attached or uploaded onto SMARTS.
- 3. What if I don't have data to report, such as there was no discharge from my facility? What do I put on the form?** For occasions where there was nothing to report (such as no discharge during the month), we recommend inserting a text box onto the form that states why no data is being reported. In addition, you should include a separate write-up on the explanation page.
- 4. What level of detail is needed on inspection reports?** Typically we only provide the level of detail requested on the report form, which is limited in space and scope. However, each facility should keep more detailed records to support information included in the Annual Report.
- 5. Are reports submitted by mail or email?** Other than reports submitted on SMARTS and to the Los Angeles RWQCB (see related story), reports are to be mailed. WGR recommends using certified mail with a signed return receipt.

"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) by June 30.
- ☁ Prepare and submit the Annual Report by July 1.

Attention Region 4 (Los Angeles Area) Dischargers!

If a facility is located within the Los Angeles Regional Water Quality Control Board (Region 4), as required by their Paperless Office Policy, the facility must submit the Annual Report electronically. Currently, they are accepting reports to be completed using either the Word or pdf templates and emailed with supporting documentation (lab reports) to their email address: losangeles@waterboards.ca.gov

Alternatively, reports may be submitted onto SMARTS, which is the Regional Board's preferred means for submitting the report.

If you are unsure of what region you are in, refer to your facility's WDID number. The first number indicates the region. If "4" is the first number, the facility is in the Los Angeles RWQCB.

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A letter will be sent in the next few days from the Los Angeles RWQCB to all of their IGP dischargers reminding them of this requirement. For more information contact, contact Mr. Ejigu Solomon at (213) 620-2237 or at esolomon@waterboards.ca.gov.

Something to Watch ...

Last month, the California Coastkeeper Alliance filed a lawsuit against the State Water Board for failing to adopt a statewide Industrial General Permit that protects the San Francisco Bay and waterways throughout the State. *"San Francisco Bay is plagued by pollutants such as copper, lead, zinc, arsenic and trash; industrial facilities such as scrap metal yards, waste transfer stations, and auto-dismantlers are a significant source,"* said Jason Flanders, Baykeeper Program Director. *"The State Water Board is required to adopt a permit that protects California communities and watersheds from highly toxic pollutants."* For more information on the lawsuit, go to www.cacoastkeeper.org/.

Please contact us if you have any questions ...

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Technical Questions about Environmental Compliance?

Call ...
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Office (209) 334-5363 ext. 114 Cell (209) 810-5151
Steve Teravskis, steravskis@wgr-sw.com
Office (209) 334-5363 ext. 115 Cell (209) 642-5020
Chelsea Dreyer, cdreyer@wgr-sw.com
Office (562) 799-8510 ext. 205 Cell (714) 926-9081

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 ...

For facilities renewing their General Permit, when are PRDs due?

Kyle Jones provided the correct answer: "Facilities that are required to receive General Permit coverage and discharge storm water will need to submit, via SMARTS the Permit Registration Documents (PRDs) by July 1, 2015." Kyle won a \$25 gift card to Bass Pro Shops.

This Month's Contest Question ...

How many separate forms are in the State's Annual Report Template?

By June 30, 2014, submit a response for the following question by email to steravskis@wgr-sw.com. All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift card to Chipotle Mexican Grill.



Storm Water Coupon

Why not let the professionals at WGR take care of your Annual Report this year? No mess ... no fuss ... we will take care of everything needed. Try us out for a **special introductory offer** of ...

\$350

Offer good through June 23, 2014. The coupon must be presented to WGR by the facility contact prior to the report preparation to obtain the special pricing. The facility operator must provide WGR with inspection and monitoring data. Price does not include postage and mailing of the report. The completed report will be sent to the facility for review, signature, and submittal to the Water Board. Reports are due to the Water Board by July 1, 2014. Allow a minimum of 5 days to prepare the report. WGR's prepaid projects are not applicable for this pricing. Contact Aaron Ortiz at (209) 810-5151 or at aortiz@wgr-sw.com to arrange for the report preparation.