

## Harvest Time – Have you Harvested your 1<sup>st</sup> Sample?

November is one of my favorite times of the year. Cooler weather, good football games, turkey and the trimmings, family and friends, and, of course, storm water sampling. Please remember that the Industrial General Permit requires you to collect two storm water samples per year. The first sample must be from the first qualifying discharge of the year. Past experience shows that November is the most common month for the first sample. If you haven't gotten your first sample, get ready! If you did get your first sample, get ready to grab the second and final sample. Believe me, it is a good feeling to have your sample out of the way and be able to enjoy your Thanksgiving dinner. Happy Thanksgiving from your friends at WGR!



## Need a Tickler?

WGR has written a program to send automatic notices of predicted storm events to your email. We call it **Rain Alert™**. To subscribe please send an email to John Ripley ([jripley@wgr-sw.com](mailto:jripley@wgr-sw.com)) and include your name, email address, and zip code. Rain Alert™ will help alert you to those upcoming sampling and observation events.

From: Storms@wgr-sw.com [mailto:Storms@wgr-sw.com]  
Sent: Sunday, November 08, 2009 6:53 PM  
To: jr\_oc@yahoo.com  
Subject: Storm Warning

Dear Subscriber,

This email is an advanced warning for possible storm in Lodi, CA US.

Sun : Partly Cloudy/Wind 

Mon : Few Showers/Wind

Please prepare to collect your storm water samples and perform your monthly observations.

Sincerely,  
WGR Southwest, Inc.



## Your November “To Do List”:

- Storm Water Observations (Form 4)
- Storm Water Sampling (if first event happens)
- Quarterly Non-Storm Water Observations sometime between now and Dec. 31 (Forms 2 & 3)
- Review your analytical results.





## Is Discharging Non-Storm Water to the Ground Allowed?

Well, it depends what it is. But, generally speaking any non-storm water which is not explicitly identified in the Industrial General Permit as an authorized discharge is prohibited without a “Waste Discharge Requirements (WDR)”. The California Water Code (CWC) requires any person discharging waste or proposing to discharge waste (other than into a community sewer system) that could affect the quality of waters of the State to file a **report of waste discharge** (CWC section 13260). Filing of a report of waste discharge requires a fee, standard forms, and supporting technical information. The supporting technical information describes the wastes, the surface features and geology of the site, treatment and control of the waste, nearby land uses, all waters potentially affected by the discharge, et seq. The Water Board can waive filing of a report (CWC section 13269) but once a report is filed it must either waive (CWC section 13269) or adopt **waste discharge requirements** (CWC section 13263). The CWC authorizes imposition of administrative civil liabilities for failure to file a report of waste discharge (CWC section 13261) and for discharge of waste before obtaining either a waiver or waste discharge requirements (CWC section 13265) unless certain conditions are met (CWC section 13264). The law provides 140 days to waive or adopt waste discharge requirements once a filed report of waste discharge has been determined complete, and more time when CEQA documents must be prepared.



WDR is often asked, “Why can’t I discharge onto the ground hydrotest water from a brand new tank or piping especially when it is clean municipal water? This article will help answer that question.”

Each waste discharge requirements order contains conditions intended to ensure the discharge conforms to the Water Code. Multiple factors must be considered in determining reasonable conditions of discharge and the quality that should be maintained in groundwater (CWC section 13263), including the relevant water quality control plans and water quality objectives. Where a group of discharges are similar, use similar treatment, and occur under similar conditions, a general order containing waste discharge requirements for everyone within the group can be adopted (CWC sections 13263(i) and 13274).

### **Discharges Regulated Under the WDR Program**

Sources: WDR Program discharges are the most diverse of the three core regulatory programs and include:

- Discharge of industrial wastewater from power plants, oilfield production, etc.
- Discharge of treated groundwater from remedial actions at leaking underground tank and other spill sites.

### **Means of Regulation**

**Individual Order** - Individual waste discharge requirements orders for specific projects are the most common means of regulation due to the many variables and factors that must be considered in establishing conditions of discharge and ensuring accountability.

**General Orders** - Similar treatment and discharge conditions have allowed development and use in this program of several general waste discharge requirements orders (a.k.a. “general orders”). A few are still in use but not available for application to new discharges. Each Regional Board should be consulted for what general orders currently available. General orders available from the Central Valley RWQCB include:

- General Waste Discharge Requirements for Discharges to Land with a Low Threat to Water Quality, State Water Board Order No. 2003-0003-DWQ.
- Land Discharge of Groundwater or Surface Water from Cleanup of Petroleum Pollution, Order No. R5-2003-0044.

Source: [http://www.waterboards.ca.gov/centralvalley/water\\_issues/waste\\_to\\_land/non-15/non15-prog-rpt.pdf](http://www.waterboards.ca.gov/centralvalley/water_issues/waste_to_land/non-15/non15-prog-rpt.pdf)

# BMP LOSS

## Storm Drain Inlet Protection

Preventing solids or unwanted liquids from going “down the drain” can be a great pollution prevention BMP. Drains can be protected by installing a device to intercept and trap fugitive solids or liquids. Some are like WGR’s Sediment Hog™ that allows for sediment removal and capture of illicit discharges or spills. Others are more like the fabric “witches hat” or have a structural frame. Most types have a high flow bypass and can be equipped with hydrocarbon absorbing pillows. If you think that this might be a good addition to your BMP arsenal, please contact Kevin Harcourt at (209) 334-5363 to discuss how to customize it to your facility’s needs.



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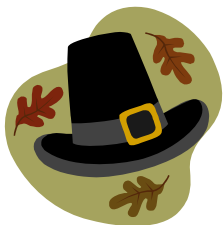
### We Have a Winner !!!

We had four responses on last month’s storm water contest, which means you still have really good odds of winning a good prize.

“Describe in your own words what is BAT/BCT and what does it mean to your facility.”

*Stephan Rosen writes:* “Defined, BAT/BCT means “best available technology economically available/best conventional pollutant control technology;” to me (and our facilities) that means compliance with requirements for stormwater discharges. BAT/BCT refers to best technologies employed at our facilities to manage stormwater effluent; the measures we take to ensure that pollutants are eliminated or at least minimized from our effluent, out best management practices (BMPs).”

**Stephan will be sent a \$25 gift card to Lowes.**



## November STORM WATER CONTEST

By November 30, submit a response for the following.

“List at least four examples of Authorized Non-Storm Water Discharges.”

All persons submitting correct answers will be placed in a drawing. The winner will receive a \$25 gift card to Starbucks for a Pumpkin Spiced Latte. Please submit your entries to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com) .

***Please contact us if you have any questions ...***

**Rain Events Newsletter:**

John Teravskis [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com)  
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**Technical Questions about Storm Water Compliance? Call ...**

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