



## THANKFUL FOR FREEDOM

November is the time of year we take a few days to remember our blessings. In this country, we have much for which to be thankful. Freedom is something all of us enjoy and many times take for granted. It was in search for freedom, that the Pilgrims left England and landed on Plymouth Rock in 1620. They left us a great heritage of freedom which we enjoy to this day. So take some time this month to think about and consider the freedoms we have and the price others have paid to protect them.

Freedom is not only a good thing for the citizens of this great land, but also for Industrial General Permittees. Many dischargers are surprised to find out that there are some “liberating” features included in the Industrial General Permit. In this edition of the “*The Rain Events*”, we will help you identify ways to experience more freedom under this permit. Would you like to sample less and perform less analytical testing? If so, keep reading to find out more information on sampling and analysis exemptions; the sampling and analysis reduction certificate; and the no exposure certification.

### Tips on Reducing Sampling and Analysis

1. For facilities with multiple outfalls that have “substantially identical” industrial activities and BMPs, sample one outfall as representative of the others, or collect a single composite sample made up of aliquots from each outfall (IGP Sect. B.7.d., p. 28).
2. Eliminate the testing of Table D specified parameters, toxic chemicals, or other pollutants if these pollutants have not been detected in “significant quantities” after two consecutive sampling events. They may continue to be eliminated until the facility operator determines they are “likely to be present” again in the storm water discharge. (IGP Sect. B.5.c.i. & ii., p. 27)
3. Using your last six sample results, complete the “Sampling and Analysis Reduction Certificate” (SARC) and submit it to your local Regional Board. (IGP Sect. B.12.b., p.33)
4. If industrial activities are not exposed to storm water, submit a “No Exposure Certification”, if accepted by the Regional Board, this will exempt your facility from sampling (IGP Sect. B.12.a., p.32)

Remember the old TV show “Get Smart” with Agent Maxwell Smart? Well, now is your chance to “Get Smart” with your storm water permit. Several years ago, the State Water Resources Control Board introduced an on-line permitting and reporting tracking system called “SMARTS”. Recently, the Los Angeles Regional Water Quality Control Board announced they are going paperless and requiring all permittees in their region to set up a SMARTS account. WGR has been using this system for several years and we have found it helps simplify annual reports and provides greater access to permit documents. If you are in the LA Region or if you would like to go paperless, you can sign up for SMARTS by going to <https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.jsp> or by downloading, completing, and mailing a registration form at:

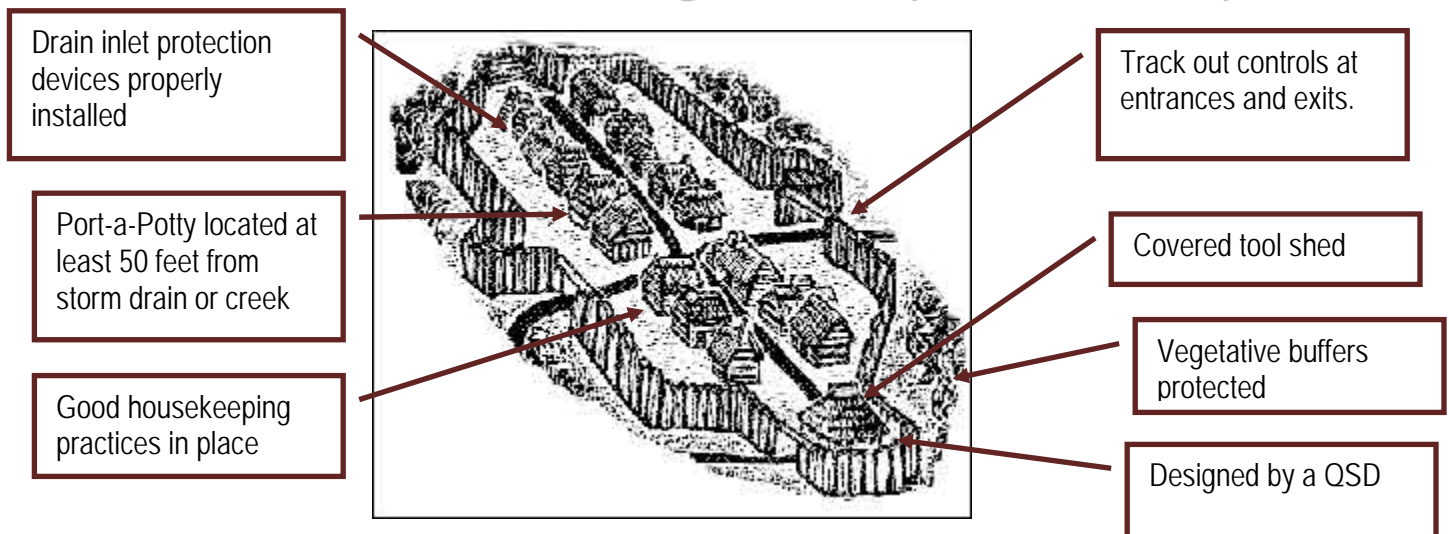
[http://www.swrcb.ca.gov/water\\_issues/programs/stormwater/docs/swarm/prereg.pdf](http://www.swrcb.ca.gov/water_issues/programs/stormwater/docs/swarm/prereg.pdf) .

### “To Do List” for November:

- Look for illicit discharges and do the 2<sup>nd</sup> Quarter Non-Storm Water Observations (Forms 2 & 3 by December 31<sup>st</sup>).
- Collect the first sample event of the season, or if you already got your first, try for the second one.
- Perform the monthly storm water observations (Form 4).
- Review the storm water analytical data and compare them to the benchmarks.



### *BMP List for the Pilgrims at Plymouth Colony*





## *The Little Known & Seldom Used SARC and NEC*

**Want to have some freedom from your sampling burden?**

**Then, take this simple quiz:**

1. Have all prohibited non-storm water discharges been eliminated or otherwise permitted?
2. Have all authorized non-storm water discharges been identified and addressed in the SWPPP?
3. Have all areas of past exposure been inspected and cleaned, as appropriate?
4. Are all significant materials related to industrial activity (including waste materials) kept from being exposed to storm water or authorized non-storm water discharges?
5. Are all industrial activities and industrial equipment kept from being exposed to storm water or authorized non-storm water discharges?
6. Are significant materials associated with industrial activity kept from being exposed to storm water through direct or indirect pathways such as from industrial activities that generate dust and particulates?
7. Is a periodic re-evaluation (at least once a year) of the facility done to ensure conditions (1), (2), (4), (5), and (6) above are continuously met?
8. For the past six sampling events, have all analytical parameters been below benchmark levels?

If you answered “yes” to questions 1 - 7, you could eliminate storm water sampling and inspections by completing and submitting the “No Exposure Certificate” (NEC) to your local Regional Water Quality Control Board (RWQCB). To download the NEC form, go to:

[http://www.swrcb.ca.gov/water\\_issues/programs/stormwater/monitoring.shtml](http://www.swrcb.ca.gov/water_issues/programs/stormwater/monitoring.shtml)

But, before you discontinue the inspections and sampling, make sure you have received a written approval of the NEC from the RWQCB. Please note that an annual report is still required of facilities with an approved NEC.

If you answered “no” to any of the first seven questions and “yes” to question #8, then you may be eligible for the Sampling and Analysis Reduction Certification (SARC). You could greatly reduce the amount of sampling required by completing and submitting the SARC form to your local RWQCB. The SARC form can be downloaded at the same website listed above. If approved, the RWQCB would require you to perform one more year of sampling after which you could eliminate future sampling until the new IGP is adopted.

To find contact information for your local RWQCB, go to:

[http://www.swrcb.ca.gov/water\\_issues/programs/stormwater/contact.shtml](http://www.swrcb.ca.gov/water_issues/programs/stormwater/contact.shtml)

# Draft Industrial Permit Update...Still Waiting!

There is nothing new to report on the proposed draft industrial permit! However... please continue to monitor the following website...

[http://www.waterboards.ca.gov/water\\_issues/programs/storm\\_water/indstpermits.shtml](http://www.waterboards.ca.gov/water_issues/programs/storm_water/indstpermits.shtml)

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## We Have a September/October Contest Winner!

**Tim Serpa** submitted the winning answer!

The question was ...

**According to the Industrial General Permit, what makes a qualifying storm event?**

Tim responded with the correct answer ... *“A storm that produces enough precipitation to cause runoff (usually a minimum of 1/10th of an inch) preceded by at least 3 days of dry weather, and occurring during normal business hours.”*

Tim will receive a \$25 gift card to  to buy a post-Thanksgiving feast.



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## BMPs on Sale!

Pre-Black Friday discounts are happening at BMPoutlet.com. Check out the latest sales!




# NOVEMBER STORM WATER CONTEST

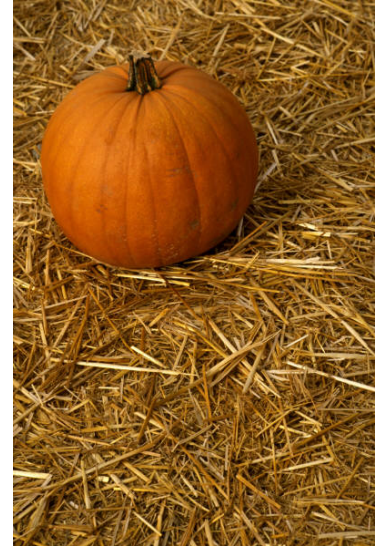
**Try it out! You can win!**

**By November 30, submit a response for the following question by email to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com) .**

According to the Industrial General Permit, what is the definition of “**significant quantities**”?

All persons submitting the correct answer will be placed in a drawing.

The winner will receive a \$25 gift card to  .



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

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

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