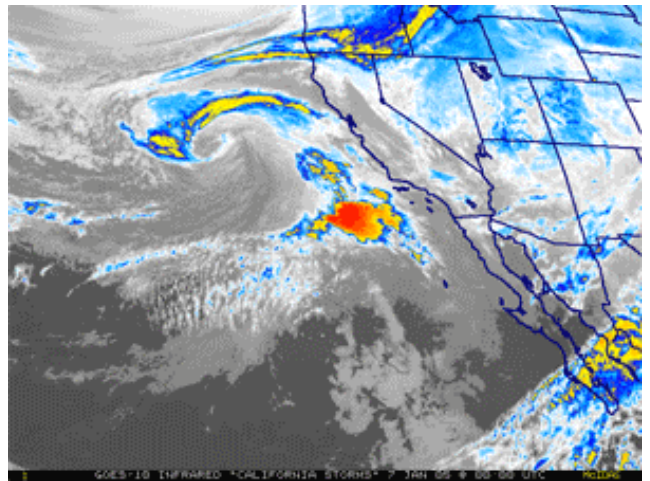


ARE YOU READY FOR THE PERFECT STORM?

Well, it's that time of the year again! The summer has come and gone and fall is here! With it comes the anticipated rainy season... Are you ready for the perfect storm? A better question to be asked, is your SWPPP ready for the perfect storm? One of the most important things to remember about your SWPPP is that it is a living document. A living document must be updated regularly to stay viable or compliant with the ever changing Federal and State regulations. Take a look at the quick SWPPP tips mentioned below to determine if your SWPPP could withstand the perfect storm which would be a surprise inspection by an EPA inspector on a rainy day.



Prepare a Training Plan - Training in SWPPP Implementation is State-mandated.

Who needs to be trained about the SWPPP? Superintendents, foremen, supervisors, samplers and contractors must be SWPPP trained.

What should the SWPPP training cover? SWPPP training should include how to use the SWPPP and site plans; how to inspect and maintain BMPs; how to do recordkeeping (including amending the SWPPP); how to work with

State and local inspectors and when to notify regulators.

KEEP EVIDENCE OF TRAINING IN YOUR SWPPP! Remember, ongoing training is the key to compliance!

“To Do List” for October:

- Schedule and perform your annual training.
- Look for illicit discharges and do the 2nd Quarter Non-Storm Water Observations (Forms 2 & 3 by December 31st).
- Contact your laboratory and order a new sample kit for the upcoming season.
- Perform the pre-storm season facility maintenance. Clean out drain inlets and filter bags; sweep paved surfaces; clean up any spills, oil spots, or other contaminants; cover stock piles, bins, and dumpsters; and stabilize any areas prone to erosion.
- Review your facility’s SWPPP.



The Compliance Corner...



Will your SWPPP weather the storm of an EPA inspection? These are the top 10 problems mostly likely to occur and cause a SWPPP violation...

Problem #1 – *The signature of the legally responsible person is often missing on the Industrial General Permit (IGP) SWPPP.*

- The SWPPP must be signed in accordance with 40 CFR (Code of Federal Regulations) §122.22. Changes to the plan must also be signed in this manner. By signing the SWPPP, the authorized representative is attesting that the information contained in the plan is true and accurate.

Problem #2 – *The required ‘Certification’ verbiage is missing or incorrect in the SWPPP.*

- The certification verbiage must be used verbatim from the IGP. See below.
- Any person signing these documents must make the following certification:
“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

Problem #3 – *The required sampling is not collected within the first hour of the qualifying storm event.*

- Make sure that the person who collects the samples understands what constitutes a qualifying storm event. This information can be found in the IGP.
- Ensure that all samples are documented correctly. Use the chain of custody (COC) form to assure compliance when applicable.

Problem #4 – *Corrective action was not taken or documented:*

- When there is a need for corrective action, as a result of a site inspection, document your findings on the correct form and make sure it is signed off by the responsible person.
- Once completed ensure that each form is kept with the SWPPP so it is readily available for review by an inspector.



Problem #5 – *SWPPP training sessions were not documented:*

- KEEP EVIDENCE OF TRAINING IN YOUR SWPPP!

Problem #6 – *Improper solid or hazardous waste management may cause a violation.*

- Wastes must be disposed of properly. Be mindful of regulatory requirements and good housekeeping practices.
- Ensure that all waste storage areas are inspected and maintained frequently.

Problem #7 – *Pollutant discharges are reaching the storm drain.*

- The truest test of whether your BMPs are working is what's leaving your site! Look for oil and other non-sediment pollutants. Keep your BMPs up to date. Replace them as needed.

Problem #8 – *Documents are not retained for five years!*

- Keep all of your documents together with your SWPPP for five years.

Problem #9 – *Inadequate BMP self inspections, may cause your facility to be fined. Ensure your BMPs are:*

- Inspected regularly, especially before the first rain event of the season.
- Sized adequately
- Frequently maintained/repared



Problem #10 – *Inadequate maintenance of your SWPPP may cause a violation. Operators often treat SWPPP as a one-time exercise, rather than a working document. As a result, site operators frequently overlook their responsibilities to:*

- Fill in names, roles, signatures of all operators on site
- Ensure that all SWPPP documentation is kept on-site
- Draw in location of storage yards and stockpiles on site map
- Record dates of inspections, education, and maintenance

Draft Industrial Permit Update...Postponed!

We apologize for the delay in publishing our September 2011 Newsletter! We were holding out until the last minute, hoping we could include information about the proposed Industrial General Permit and related articles. However... please continue to monitor the following website...

http://www.waterboards.ca.gov/water_issues/programs/storm_water/indstpermits.shtml

As of the date of our September-October Newsletter, the anticipated announcements about the Industrial General Permit renewal updates have been postponed!!! Stay tuned for more information in our November Newsletter or you can visit the link referenced above.

We Have a July/August Contest Winner!

Lew Watkin submitted the winning answer!

The question was:

According to the Industrial General Permit, what are the two “major objectives” of the SWPPP?

- *To identify and evaluate sources of pollutants associated with industrial activities, and*
- *To identify and implement site specific best management practices (BMPs) to reduce or prevent pollutants associated with industrial activities.*



Lew will receive a \$25 eGiftCard to  to buy raingear to stay warm and dry while sampling the perfect storm.

BMP facts

SWPPP management should be part of your greater risk management plan

- BMPs are "Best Management Practices", the actual devices specified by your SWPPP that will reduce/prevent the escape of pollutants from your industrial site.
- BMPs act as you're on site "pollution filters" trapping and stopping potentially hazardous and dangerous materials from entering into our water ways. BMPs such as drain inlet protection devices will help to control the loss of pollutants from your site from spills or leaks.
- BMPs alone will not keep you compliant; you must use them in conjunction with a SWPPP.
- BMPs must be properly installed and maintained and checked frequently.
- It may happen that you will want to choose different BMPs, once you start installing or implementing them. That's okay! Just be sure to update your Storm Water Pollution Prevention Plan.



(209) 334-5363 ext. 201

Prepare for the Storm Season

Do your facility storm drains need a good cleaning? Would you like to have drain inlet protection installed to stop sediment, heavy metals, and oil and grease from entering your drains? Do you want to see a reduction in pollutants in your storm water discharge? If so, we will mobilize to your location and get your drains in tip top shape. Call to schedule an appointment.




OCTOBER *STORM WATER* CONTEST

Try it out! You can win!

By October 31, submit a response for the following question
by email to jteravskis@wgr-sw.com .

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

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 ...

Rain Events Newsletter Editor:

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

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John Teravskis, jteravskis@wgr-sw.com , (209) 649-0877
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