

The Monthly Dirt

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

Time for Action

When it starts raining again in our State, Risk Level 2 and 3 projects, as well as LUP Type 2 and 3 projects will need to test discharges from their construction projects

for pH and turbidity. Remember the rules of engagement for sampling: **#1** No discharge = no sampling; **#2** Each project must collect and test a minimum of three samples from the entire site for each day during the “qualifying” rain event; and **#3** Each point of discharge must be sampled at least once per day during the “qualifying” rain event. After collecting the field data, the QSP will need to evaluate the results and compare them to Table 1 on page 28 of the CGP Order (or for LUPS, Attachment A, p. 14). This table contains numeric action levels (NALs) for pH and turbidity. According to the Order (p. 28-29), the lower **storm event daily average** NAL for pH is 6.5 pH units and the upper storm event daily average NAL for pH is 8.5 pH units. The permit states that the discharger shall take action if the discharge is outside of this range of pH values. But don’t forget, according to the State’s [FAQ #44](#) and [Tech Bulletin 2013.1](#), pH is logarithmic and must be averaged accordingly. However, turbidity is not a logarithm and is a standard mathematical average. The CGP states (Order p. 29), “the NAL **storm event daily average** for turbidity is 250 NTU.”

So what action is required in response to a daily average NAL exceedance? Whenever the results from a storm event daily average indicate an exceedance of a NAL (as listed in Table 1), the discharger is required to take the following action:

1. Conduct an evaluation of the construction site and possible run-on to determine if pollutant sources from onsite or offsite may have caused or contributed to the NAL exceedance.
2. If it is determined that the construction activity is the pollutant source, immediate corrective action must be implemented. Or if the NAL was due to run-on, appropriate run-on controls must be implemented. Notice that in the case of an NAL exceedance, the corrective action must be *immediately implemented* and not, as otherwise required, to begin within 72 hours of the observation.
3. The SWPPP must be amended to include information about the NAL exceedance, the subsequent evaluation, the sources of pollutants, and the corrective action that was implemented for the construction activities or the run-on that was causing the exceedance.
4. Within 10 days of a NAL exceedance, the discharge must submit the monitoring data on SMARTS. An NAL exceedance report may be required (see page 2 of this newsletter for more information on when the report is required.)

Table 1- Numeric Action Levels, Test Methods, Detection Limits, and Reporting Units

Parameter	Test Method	Discharge Type	Min. Detection Limit	Units	Numeric Action Level
pH	Field test with calibrated portable instrument	Risk Level 2	0.2	pH units	lower NAL = 6.5 upper NAL = 8.5
		Risk Level 3			lower NAL = 6.5 upper NAL = 8.5
Turbidity	EPA 0180.1 and/or field test with calibrated portable instrument	Risk Level 2	1	NTU	250 NTU
		Risk Level 3			250 NTU

Training Tips from the Pros

The CGP states, “*The discharger shall ensure that all persons responsible for implementing requirements of the permit must be appropriately trained. Training should be both formal and informal, occur on an on-going basis, and should include training offered by recognized governmental agencies or professional organizations.*” Even the QSPs at a professional consulting firm need to be trained on an “on-going basis”. So what do we do? We will let you in on one of our secrets of the trade. One way we keep our inspectors refreshed in their trade is to require them to weekly watch a short video. Caltrans has some excellent videos on how to install, maintain, and inspect various specific BMPs.



<http://www.dot.ca.gov/hq/construc/stormwater/interactive.html>

The following are the video topics that Caltrans has available for your crews to watch:

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|--|---|
| 01 Sediment Control Practices Intro | 13 TC-1 Stabilized Construction Entrance/Exit |
| 02 SC-1 Silt Fence | 14 TC-2 Stabilized Construction Roadway |
| 03 SC-2 Desilting Basins | 15 TC-3 Entrance/Outlet Tire Wash |
| 04 SC-3 Sediment Traps | 16 WM-1 Material Delivery Storage |
| 05 SC-4 Check Dams | 17 WM-3 Stockpile Management |
| 06 SC-5 Fiber Rolls | 18 WM-4 Spill Prevention Control |
| 07 SC-6 Gravel Bag Berms | 19 WM-5 Solid Waste Management |
| 08 SC-7 Street Sweeping | 20 WM-8 Concrete Waste Management |
| 09 SC-8 Sand Bag Barriers | 21 Construction Site Record Keeping Reports |
| 10 SC-9 Straw Bale Barriers | |
| 11 SC-10 Storm Drain Inlet Protection | |
| 12 Sediment Control Practices Conclusion | |

BMPs during a Drought?

As you are aware, California is experiencing a potential record-breaking drought. Although the extra days of sunshine have been good for getting more construction done than in a typical mid-winter month; don't forget to continue with weekly inspections and maintaining the mandatory BMPs. In the CGP there is no storm season. BMPs have to be installed and implemented 365 days a year. But there is one BMP that may be needed which is typically not implemented this time of the year ... dust control.

Upcoming Training ...

Got SWPPP? Classes coming to Lodi:

- ✓ CPESC Review, Extra Math Review & Exam – February 4-6, 2014 (*must register by Monday, January 27*)
- ✓ QSP/QSD Training, April 22-24, 2014
- ✓ PDU Week – Free Workshops May 19-23, 2014

For more information about these classes, go to www.gotswppp.com.

NEED QSP REFRESHER TRAINING OR JOB SITE TRAINING?
WGR WILL COME TO YOUR LOCATION!
CALL US TO SET UP YOUR TRAINING EVENT.

Submittal Confusion?

The following permit reference recently was brought to our attention during a QSP/QSD class. For an NAL Exceedance Report the permit states the following in Attachment D:

*In the event that any effluent sample exceeds an applicable NAL, Risk Level 2 dischargers shall electronically submit all storm event sampling results to the State Water Board no later than 10 days after the conclusion of the storm event. **The Regional Boards have the authority to require the submittal of an NAL Exceedance Report.***

We have always taught that NAL exceedance reports were automatically required and must be submitted on SMARTS within 10 days of a daily average NAL exceedance. But, how do you interpret the above highlighted section? Should the discharger wait until the Regional Board requires the submittal? *The Monthly Dirt* contacted the State Water Board and a couple of Regional Boards on this question. The State Water Board replied that it is “the raw data only” (monitoring results) that is required to be submitted in SMARTS 10 days after the conclusion of the storm event. Additional information such as the corrective actions taken (in the form of a report) is required only upon Regional Board request. The Regional Boards can request the report whenever they feel there is a need to obtain the information.

Please contact us if you have any questions ...

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Need a HERO?



<http://www.youtube.com/watch?v=dcGrSqtEvIE&list=PL859F27E27F10F884&feature=c4-overview-vl>



- ✓ Protect hillsides in an instant.
- ✓ Easy-to-store duffel bag can be stored in field trucks.
- ✓ One person can install the device.
- ✓ One use will pay for the product by preventing damage and costly repairs.



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