

# the Rain events

February 2015

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

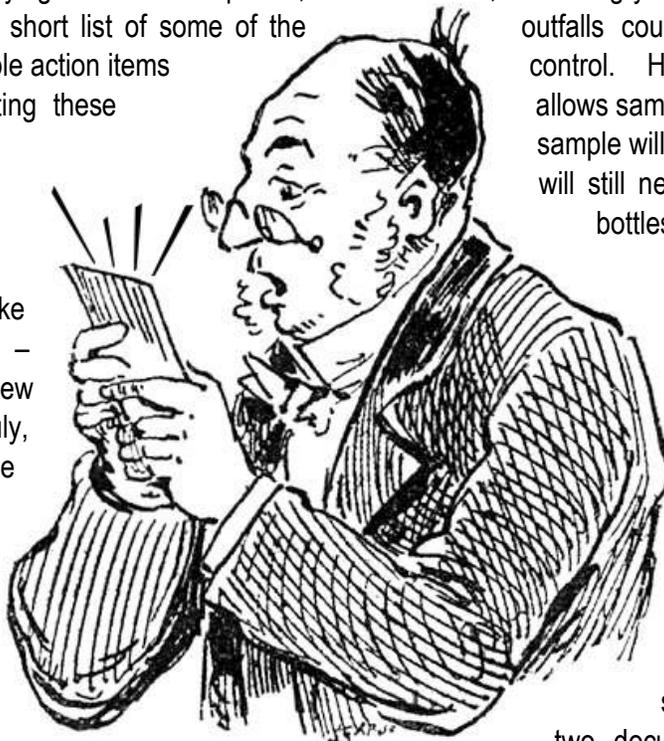
## GREAT EXPECTATIONS

what to expect from the New Permit in 2015

With the new Industrial General Permit (2014-0057-DWQ) coming into effect only a few short months from now, many current permittees are wondering what to expect from this new document. We all know there will be many new requirements coming down the pike, but how should you as a permit holder implement these changes? To assist you in developing a game plan for complying with this new permit, *The Rain Events* put together a short list of some of the more notable changes, and a couple action items to get you started in implementing these new requirements.

### *Get Ready for Change!*

If you are a person who doesn't like change, start preparing yourself – this new permit has many new requirements. Starting in July, industrial permittees will be required to conduct facility inspections on a monthly “dry weather” basis. This is a marked change from the current permit, which only called for quarterly non-storm water inspections. Also, permittees will now be required to sample four rain events per year – two from July through December, and two between January and June. This means you will be on the hook to sample rain events starting July 1, instead of the first of October. However, the permit does allow for a possible reduction in the number of samples you need to collect per year, as long as you have no Numeric Action Level benchmark exceedances for **four** consecutive rain events. And here's a change that should make some of you happy – industrial



facilities may be able to collect a composite sample by combining samples from up to four different outfalls. The discharger must first upload a “Qualified Combined Samples” justification onto SMARTS and obtain approval from the Regional Water Board. This may be advantageous if you have an outfall on your site that tends to have slightly high numbers; combining your composite sample with three other outfalls could help keep your numbers under control. However, the new permit no longer allows samplers to composite in the field, so this sample will be combined by the laboratory. You will still need to fill a complete set of sample bottles for each outfall.

### *Action #1: Get Up To Date!*

Before you start worrying about all these new changes, there are a few steps you need to take right away. First, if you haven't revised or updated your SWPPP and site map, now is the time to do so. If you have already revised these two documents, make sure they are both uploaded onto the online SMARTS database (for a refresher on the SMARTS system, listen to [this informative interview](#) on SWPPP Radio). Secondly, make every effort to install your facility's advanced/treatment best management practices before the new permit's effective date of July 1. Once the new permit kicks into gear on July 1, industrial permittees will be required to meet more stringent criteria for BMP installation, unless those BMPs were in place before the permit became effective. (Continued on next page)

(continued from page 1)

## **Action #2: Filing for NEC Coverage? Do It As Soon As Possible!**

For those of you looking to file for a No Exposure Certification, remember that the deadline for filing is October 1. The NEC process on SMARTS is not expected to be available until July 1, 2015, though it may be ready sooner. With this in mind, get your paperwork in order now so you will be ready to file as soon as it becomes available. During a recent workshop, Patrick Otsuji from the State Water Board recommended that if you are currently in the permit and planning to file for NEC coverage, you should consider filing a Notice of Termination once you have all your NEC requirements fulfilled and are able to start the NEC application process on SMARTS. See the NEC checklist in Appendix 2, Section D of the new permit.

## **Conclusion**

**The Rain Events** staff strongly recommends that each industrial permittee read through the new permit to see these changes for yourself. As the Legally Responsible Person for your site, you are responsible for your site's compliance with the Industrial General Permit, including its deadlines. It is to your advantage to do all in your power to ensure that your site is compliant with the permit. And again, if you know of something that needs to be done to maintain your site's compliance with the new IGP requirements, do it now! If you have any exceedances, fix them now. Once the new permit becomes effective on July 1, you will have to comply with many new requirements that you could avoid by addressing compliance issues now. ☔

# the Compliance corner

## NEC Checklist

Need a quick refresher on what items are included in the NEC checklist? Here is a **simplified version** of the checklist found in Appendix 2, Section D of the new permit. The discharger must prepare a checklist saying that the facility has been evaluated, and that all of these pollutant sources have been eliminated and will not be exposed to precipitation:

1. Runoff from cleaning/storage of industrial machinery, or areas that have remaining residual from these activities
2. Residual materials from spills or leaks
3. Materials from past industrial activities
4. Material handling equipment (except properly maintained vehicles)
5. Products being loaded/unloaded or transported
6. Products stored outdoors (except final products intended for outdoor use)
7. Materials in deteriorated or leaking storage containers
8. Materials that are handled/stored on the discharger's roads or railways
9. Waste material (except properly covered containers)
10. On-site application or disposal of processed wastewater (unless covered under NPDES permit)
11. Particulate matter or visible deposits from roof stacks or vents

Need a SWPPP? Give us a call at (209) 334-5363, ext. 110

## "To Do List" for February:

- ☔ Perform the 3<sup>rd</sup> Quarter Non-Storm Water Observation (Forms 2 & 3) by March 31 (we recommend waiting until the end of March).
- ☔ Get your second qualifying storm event sample if you have not yet done so. If you haven't gotten your first sample, you are way behind.
- ☔ Perform and document your monthly storm water inspections (Form 4).

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MAY 18-22, 2015

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

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**Technical Questions about Environmental Compliance?**

Call ...

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(562) 799-8510 ext. 1003



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A seminar hosted by **Filtrexx International and The Monthly Dirt**

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**Mark Woolbright**, Manager of LivingWalls Division for Filtrexx, will discuss the design and benefits of living walls; **Bryan Hofmann**, Regional Representative for Filtrexx, will review a local slope stabilization project in Gilroy, CA. **Craig Kolodge, Ph.D.**, Regional Representative for Filtrexx, will discuss the use of compost and native plants in living walls and their positive impact on water quality and overall site health.

**John Teravskis, QSD/QSP, CPESC**, Editor of *The Monthly Dirt*, will discuss the Living Wall demonstration project located at WGR's Lodi office.



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Each session is held 9:00 a.m.-12:00 p.m. A light lunch will be provided.

**March 10-Lodi, CA:** WGR Southwest, Inc., 11780 N. Hwy 99, Lodi, CA 95240

**March 11-Aptos, CA:** Best Western/Seacliff Inn, 7500 Old Dominion Court, Aptos, CA 95003 (State Park Drive Exit)

**March 12-San Jose, CA:** Ewing Irrigation, 1605 Old Bayshore Hwy, San Jose, CA 95112

## Register at [www.filtrexx.com/lw-cal](http://www.filtrexx.com/lw-cal)

For more information, contact Bryan Hofmann at 209-200-7841 or [bryan.hofmann@filtrexx.com](mailto:bryan.hofmann@filtrexx.com)



# Designing with LivingWalls™

## Three Different Locations

### Lodi, CA - March 10



**WGR Southwest, Inc**  
11780 N Hwy 99,  
Lodi, CA 95240

### Aptos, CA - March 10



**Best Western/Seacliff Inn**  
7500 Old Dominion Court  
Aptos, CA 95003

### San Jose, CA - March 10



**Ewing Irrigation**  
1605 Old Bayshore Hwy,  
San Jose, CA 95112

# Living Wall

## DEMONSTRATION GARDEN



The Living Wall demonstration garden is a collaborative project from Filtrexx International, Zanker Recycling, and WGR Southwest, Inc., to provide landscape architects and developers with a real-life demonstration of Living Wall technology.

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### Product Specifications:

- Absorbs up to 5 gallons
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- 2.5 gallons of granular absorbent
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## 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 ...

**Should rain gauges be installed next to tall buildings or trees? Why or why not?**

Dan Nielsen got it right – **rain gauges should not be installed next to tall buildings or trees** because they could block rain from reaching the gauge, causing your numbers to be incorrect.

Pete wins a \$25 gift card to Starbucks to enjoy a piping-hot salted caramel mocha.

### This Month's Contest Question ...

How many rain events will the new Permit require you to sample *per year*?

By February 28, 2015, submit your response to the above question by sending an email to [steravskis@wgr-sw.com](mailto: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.



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