The second half of the compliance year is here – it's time to plan ahead.

Do you like to know where you're going in advance, rather than just flying by the seat of your pants? If that's you, then right now is a good time to start looking towards the future of your industrial storm water compliance program. Do you know what's going to be required of you in the upcoming new storm water year? Is your facility advancing to another Numeric Action Level (NAL) exceedance level for a pollutant? Or are the results from the current storm water year looking like they are going to drop your facility back down from an upper level? If so, great work! If not, it's time to put into place some new compliance strategies to hopefully keep that from happening. Or you might want to start thinking about what's coming. And we're here to help you with that! In this month's edition of **The Rain Events**, we're going to be discussing how to plan ahead for the future of your facility's storm water program.

Because of the consistent storm patterns we've seen over the past several months, hopefully by now, you have been able to collect most, if not all, of the 4 samples you need for this current compliance year. And if you're still waiting for one or two more samples, we hope you are evaluating the data from the previous samples to determine what direction your facility is heading next and are starting to take any corrective actions necessary to keep from having any more exceedances. Over the next few months – between the end of the rainy season and your 4-sample collection requirement and the end of the compliance year (June 30th) , it is a good time to do an end of year analysis of what Exceedance Response Action (ERA) Level your facility will be heading towards in the future – whether that's staying in the level you are, dropping to a lower level, or advancing to an upper level. As a reminder, if you are at Baseline, you just need to keep on top of good operation and maintenance procedures. If you are at higher levels a little more is involved. If you are at Level 1 it means you had an NAL/TNAL exceedance for a certain parameter, you were sampling for. An entry into Level 1 triggers the need for a Level 1 ERA Evaluation – a QISP conducted assessment of industrial pollutant sources at your facility that could have caused or contributed to the exceedance.

This assessment will help determine what BMPs will be implemented at your facility to help control that pollutant. By January 1st of the reporting year, the discharger will be required to revise their SWPPP to show the BMPs implemented due to the assessment as well as certify and submit the Level 1 ERA Report that their QISP prepared. So by the time you read this newsletter, you should have already accomplished this if you are a Level 1 facility. According to the Permit, *"A Discharger's Level 1 status for a parameter will return to Baseline status once a Level 1 ERA report has been completed, all identified additional BMPs have been implemented, and results from four (4) consecutive QSEs that were sampled subsequent to BMP implementation indicate no additional NAL/TNAL exceedances for that parameter."* However, if the sampling results indicate continued exceedances for that same parameter after the transition to Level 1, the facility will advance to Level 2 for that parameter. Keep in mind that you can be at different levels for different parameters. Upon the commencement of Level 2 status, the discharger must certify and submit a Level 2 ERA Action Plan that is created by a QISP that addresses the Level 2 exceedance and the demonstration(s) the discharger selected to implement, as well as the schedule of tasks to be completed in order to comply with the Level 2 Action Plan. If you are advancing into the Level 2 status, then you will have one or more demonstrations to choose from to help explain or prevent and control further pollution from occurring. These demonstrations include an Industrial Activity BMPs Demonstration, Non-Industrial Pollutant Source Demonstration, and a Natural Background Pollutant Source Demonstration. While you may not need to do these demonstrations for Level 1, valuable lessons for controlling and preventing further exceedances can be drawn from them *(see the Permit for the full details on these)*. All three of these

demonstrations include an assessment of pollutants on site – pollutants directly or indirectly related to industrial activities, or a natural background pollutant; an evaluation of what BMPs would be best suited for that scenario, and an action plan of how to implement it.

But what if you are one sample away and close enough to a parameter that allows you to stay at the same level or drop to a lower level if you were to implement BMPs or practices to reduce the pollutant of concern in your samples? If that is the case, you will definitely want to take a look at those sample results and assess your current exceedance status and put into place some BMPs which might help keep that last sample from tipping the scale into an exceedance.

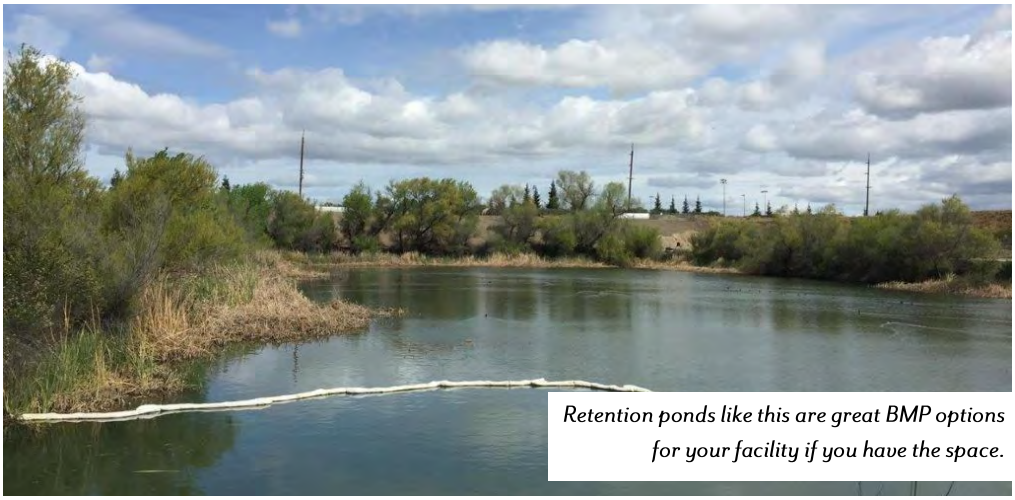
However, even if your facility collected all four samples, you should still take a look at the results to see if there are any instantaneous or annual Numeric Action Level (NAL) exceedances. Remember annual NALs are averages for the entire facility for all samples collected at all outfalls. If the average for any parameter is just barely over the annual NAL, it might be wise to consider collecting and testing additional samples after implementing additional BMPs to see if you can get the average to drop below the NAL. This data will affect the July 1 outcome. Do what you can now, while you still have the time, to influence the direction of your compliance program in the upcoming year.

But, if after all you could do isn't enough to keep you from advancing a level, you will need to get a QISP involved. *What exactly does a QISP do?* A QISP is a Qualified Industrial SWPPP Practitioner and they have ten specific tasks that they are given to do for dischargers who are in Level 1 or Level 2 status:

1. May represent one or more facilities but must be able to perform the functions required by the IGP at all times.
2. Assigned to a facility that reaches Level 1 status (and Level 2)
3. More accurately identify discharge locations representative of the facility storm water discharge
4. Select and implement appropriate sampling procedures
5. Evaluate and develop additional BMPs to reduce or prevent pollutants in industrial storm water discharges
6. Assist with the completion of the Level 1 Evaluation and preparation of the Level 1 ERA Report
7. Assist with the completion of the Level 2 ERA requirements and the preparation of the Level 2 Action Plan & Level 2 Technical Reports
8. Assist new dischargers in preparing the SWPPP and monitoring program
9. Provide training to "appropriate team members" for Level 1 facilities.
10. Be informed, responsible, and attentive to the required duties of a QISP; keeping the QISP certification in good standing with the State Water Board and CASQA

Now is also a really good time to start looking into what treatment options would not only be cost effective but would produce positive results for your facility in the upcoming year. Look into some of the bigger treatment options which might have better results for your dollar – ponds, vegetated swales, end of line treatment devices, and phytoremediation treatment systems (check out this phytoremediation system). Available treatment options have a wide range in applicability as well as price tag, so it's a good idea to talk with your QISP about your treatment preferences so that you can figure out what would work best for your facility's specific needs. Capturing and infiltrating the storm water that's on your facility is the best way to handle it if feasible for your space. Especially if you can create a pond or basin that will keep your facility from discharging. If you don't have a pond, do you have space to create one on the premise or reroute your runoff to an adjacent property your facility owns which can accommodate a pond?

According to the IGP, storm water containment and discharge reduction BMPs include, *"BMPs that divert, infiltrate, reuse, contain, retain, or reduce the volume of storm water runoff. Dischargers are encouraged to utilize BMPs that infiltrate or reuse storm water where feasible."* Think ponds, retention basins, culverts, etc. And while these advanced BMPs aren't necessarily required for your facility, the Water Board recommends and encourages using them.



Retention ponds like this are great BMP options for your facility if you have the space.

By nature, storm water containment and discharge reduction BMPs help capture storm water and during typical wet seasons, prevent a discharge from occurring or reduce the overall number of discharges. Often, the initial discharge from a storm event will have the highest concentration of pollutants. So, by installing containment and discharge reduction BMPs (even if your containment can only capture and contain the smallest storms) it can help prevent NAL exceedances, reduce the number of discharges your facility has, and save you storm water analytical costs. Don't forget about vegetated swales which can capture and infiltrate water! Plants are a very effective, natural, and usually cost-efficient treatment source, since certain types of plants actually consume some of the pollutants which could be problematic for your facility – things like nitrites/nitrates, phosphates, and metals.

While the storm season is winding down, it's time to start planning ahead for your next storm water year and putting into place measures which will ensure clean storm water and a compliant facility.

The Rain Events

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Attention

Need a SWPPP for your facility? Or a QISP? Or just some advice?

Yes	Remind me later

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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 show 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.

What is the rule of 4's?

Congratulations to Laura who answered, *"4 Qualified Storm Event (QSE) samples per year: 2 samples July–December & 2 samples January–June. Sampling timing: Collect samples within 4 hours of discharge start during operating hours, or within 4 hours of operating hours starting if the storm began less than 12 hours earlier."* We hope you enjoy a refreshing treat from Jamba Juice.

...This Month's Contest

What are the demonstrations an industrial facility can choose from?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, February 6th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a $25 gift card to Chick-fil-A.

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