

## QUALIFIED COMBINED SAMPLES

### Changes in the IGP

The new Industrial General Permit (Order 2014-0057-DWQ) incorporates many changes from the current permit, as we have seen in past editions of *The Rain Events*. One of the areas that has changed significantly is the requirements for combined storm water samples – a process that many dischargers have utilized under the current General Permit. But, the State feels the requirements for this technique in the current IGP leave room for error, so the new IGP has been revised to include a bunch of new requirements to help keep this valuable sampling technique more consistent and accurate.

### What's New?

According to Section XI.C.5.a of the new permit, the discharger *“may authorize an analytical laboratory to combine samples of equal volume from as many as four (4) discharge locations if the industrial activities, BMPs, and physical characteristics (grade, surface materials, etc.) within each of the drainage areas are substantially similar to one another.”* Notice anything different from the current regulations? There's quite a bit. First, notice the phrase *“...may authorize an analytical laboratory.”* Combining your samples is no longer something that you or your sample team can do in the field. In order to keep things consistent, the General Permit requires that this procedure be done by the laboratory where you send your samples. Second, did you catch the phrase *“...as many as four (4) discharge locations”*? There is now a limit as to how many outfalls you can combine. Apparently, this is not a hard and fast rule, as

the permit gives allowance for combining *more* than four samples in Section XI.C.5.e, but only with special approval from Regional Water Board staff. However, many industrial facilities don't have more than four outfalls anyway, and even if you do, your site can still benefit from combining only four of them. Third, pay attention to the phrase *“...if the industrial activities [etc.]...are substantially similar.”* This is not too different from the current permit, but it is worth noting. You can't rush out and order your lab to start mixing samples if your outfalls are fed by drainage areas with completely different characteristics – say asphalt on one and gravel on another. In order to qualify for combined samples, each drainage area must be “substantially similar.” Industrial dischargers will have to make a judgment call on which areas of the facility are “substantially similar” in terms of industrial activities, BMPs, and physical characteristics, and substantiate the rationale as you will see in the next section.

### How Do You Do It?

If you think your facility fulfills the above requirements for Qualified Combined Samples, don't rush out and ask your lab to start mixing all your samples together. There are still a few things you need to do. First, the new permit requires dischargers who want to combine samples to revise the Monitoring Implementation Plan and include justification for how each outfall proposed to be combined is “substantially similar.”

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After revising the Monitoring Implementation Plan and including the justification for Qualified Combined Samples, the discharger is required to upload it onto the SMARTS database system. Once this is done, Section XI.C.5.d of the new permit, gives permission to authorize the laboratory to combine samples of equal volume from up to four outfalls. But watch out! The Regional Water Board will be keeping an eye on facilities who are using Qualified Combined Samples, and if they don't think your drainage areas are "substantially similar," they can reject your justification or request additional supporting documentation. If this happens, it's not the end of the world, but you will not be able to combine your samples until you have satisfied the Regional Water Board's requirements and they approve your justifications.

## Conclusions

The Qualified Combined Samples technique is a great resource for industrial permittees, but it is not something that can be taken lightly. Before getting excited and telling your lab to start mixing your samples, make sure to do your homework. Inspect your site with the eyes of a regulator, and if you can see them agreeing with your assessment, make the necessary changes to your Monitoring Implementation Plan, and upload it to SMARTS. On your next rain event, go ahead and authorize the lab to combine your samples. If the Regional Board disagrees with your justifications for some reason, make sure you follow their guidance, and don't combine any more samples until the Regional Board gives you the go-ahead. ☔

## the Compliance corner

### A laboratory's perspective on Qualified Combined Samples

Have you ever wanted to know just what exactly the laboratory does with your samples? Do you have any questions about how to set up a qualified combined storm water sample with your lab? Then listen to this SWPPP Radio interview as Aaron Ortiz of WGR Southwest interviews Rosa Venegas and Dan Farah from McCampbell Analytical to hear their side of the story when it comes to qualified combined samples.



<http://wgr-sw.com/podcasts/listen.php?ID=116>

Need a SWPPP? Give us a call at (209) 334-5363, ext. 114

### "To Do List" for March:

- ☔ 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).
- ☔ Have you obtained two samples yet? Don't let any more qualifying rain events go by – there might not be too much more!
- ☔ Perform and document your monthly storm water inspections (Form 4).
- ☔ Schedule your Annual Comprehensive Site Compliance Evaluation for a date in May (Form 5).

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## PRODUCT SPOTLIGHT

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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...*

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

Congratulations, Ron Vander Veen - you are correct! The new Industrial General Permit requires permittees to sample **four rain events per year**: two from July-December, and two between January and June.

Ron wins a \$25 gift card to Chipotle Mexican Grill to host a burrito-eating contest with his sample team.

## This Month's Contest Question:

**What must be included in your facility's Monitoring Implementation Plan before you can authorize combined samples?**

By March 31, 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 cart to Taco Bell.



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