

the Rain

events

JULY 1

↖ **BASELINE**

LEVEL 1 ↗

WHICH WAY WILL YOU GO?

California industrial facilities are rapidly approaching a fork in their compliance roadway. Some facility operators are well aware of the impending fork and even already know which direction they will be heading. Other operators are quite unaware of the split in the compliance pathway and do not know what to expect over the next few months. This edition of *The Rain Events* is dedicated to helping you prepare for the series of events that will be happening over the next few months and to prepare you for the July 1 fork-in-the-road.

It probably does not come as news to you that the Industrial General Permit requires industrial facilities to collect four samples over the course of the permit year. As we near the end of this first compliance year and the storm season, most facilities have (hopefully) collected the required samples and uploaded the results onto SMARTS. In fact, earlier this month your facility may have received a friendly reminder email from the State Water Board reminding you to upload your data onto SMARTS using the Ad Hoc Reports. The data you have been collecting all season will now influence the direction of your facility's storm water program. Here is a month-by-month look at what is coming up on the path – including the July 1 fork-in-the-road.

April: This is the month to finish the storm water sampling program. With El Niño waning, there may not be too many more opportunities to collect storm water samples. If you have not collected the first or second sample for the January 1 – June 30 period, you will want to try to do so now. 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 fork in the road. Do what you can now to influence the direction of your compliance program.

May: Although the Industrial General Permit allows it to be done any time during the compliance year, we recommend that facility operators perform the Annual Comprehensive Facility Compliance Evaluation (ACFCE) in May of each year. The reason we recommend May as the month to do the ACFCE is because it is to be an assessment and review of all sampling and inspection records and other factors needed to comply with the Annual Report that will be prepared during June. As mentioned above, most monitoring and inspection data should now be complete for the compliance year. But the ACFCE is not just a review of data and

paperwork, it consists of an inspection of all areas of industrial activity and pollutant sources; an inspection of all drainage areas previously identified as having no exposure to industrial activities; an inspection of equipment needed to implement BMPs (i.e. spill response supplies, containment structures, treatment systems, drain inserts, covers and shelters, etc.); and a review and assessment of the effectiveness of all of the BMPs.

June: The Annual Report is actually due on July 15th of each year (please note that this is a change from previous years), but we recommend that you do not wait until July to start preparing this report. You will need to pull together quite a bit of information and data, and waiting until July might be cutting it too close for comfort. Not only is the due date a change for Annual Reports, but there are other changes including that the report will now have to be completed, certified and submitted on SMARTS. The report will include a checklist which will ask the Discharger to verify that it has implemented each element of the Industrial General Permit. An explanation will be required for any areas of non-compliance. Previously submitted Ad Hoc reports will be linked to the annual report. The date the ACFCE was performed will need to be entered into the report. And finally, not only do you need to verify that the SWPPP has been updated and revised during the year, but the revised page numbers and/or sections will also need to be identified in the Annual Report. Again, we advise - don't wait until July to start this.

July: The fork-in-the-road will be on July 1 when industrial storm water programs will either remain on the baseline path or will veer to the Level 1



Status path. For those, moving to Level 1, it will set off a chain of events that will include having to employ or contract with a QISP, prepare the ERA Level 1 Evaluation by October 1, 2016, and prepare the ERA Level 1 Report by January 1, 2017. Refer to the Compliance Corner article for more information about what Level 1 Status will mean for your facility. ☁

"To Do List" for April

- ☘ Perform the April monthly inspection.
- ☘ April showers bring not only flowers but also a last chance to sample. Make sure you get your last sample so that your storm water program smells as sweet as the spring blossoms!
- ☘ Schedule the Annual Comprehensive Facility Compliance Evaluation for May.

the Compliance corner

Level 1 ERA Response

At this point in the monitoring year, many dischargers have collected their four qualifying storm water samples. But due to the new monitoring and sampling requirements in the new Industrial General Permit, many facilities are finding they are having either instantaneous or annual NAL exceedances. As a result, we have been getting a lot of calls concerning the Level 1 Exceedance Response Action (ERA). We have heard from several facilities expressing concern that they may be out of compliance with the General Permit and are worried about what to do next.

First of all, having NAL exceedances **does not** make you out of compliance with the General Permit. However, having NAL exceedances **and not responding to them** as outlined in Section XII of the General Permit **does** make you out of compliance with the General Permit.

So what does a Level 1 ERA Response entail?

Starting on July 1, 2016, if you have had NAL exceedances, you will need to perform a Level 1 ERA Evaluation, assisted by a Qualified Industrial Storm Water Practitioner (QISP) and Level 1 Report prepared by a QISP.

Level 1 ERA Evaluation

1. Needs to be completed by October 1st once reaching Level 1 status;
2. Entails an evaluation, assisted by a QISP, of what pollutant sources may have caused the NAL exceedance or exceedances; and
3. Identifies what BMPs in the SWPPP address the pollutant sources and determines if any additional BMPs and corresponding SWPPP revisions are necessary to prevent future NAL exceedances and to comply with the requirements of the General Permit.
4. Also, the IGP states that all drainage areas are to be evaluated, not just where the NAL exceedance or exceedances occurred.

Level 1 ERA Report

Based on the above Level 1 ERA Evaluation, the discharger must complete the following by no later than January 1st of the year following the start of the facility's Level 1 status.

1. Revise the SWPPP as necessary and implement any additional BMPs identified in the evaluation;
2. Certify and submit the Level 1 ERA Report prepared by a QISP on SMARTS. The report should include the following:
 - A summary of the Level 1 ERA Evaluation;
 - A detailed description of the SWPPP revisions and any additional BMPs that address the exceeded NAL or NALs.
3. On SMARTS submit and certify the assisting QISP's name, identification number, and contact information.

Having NAL Exceedances? Need Help?
Give us a call at (209) 334-5363, ext. 114

QISP Training Update

It is almost here! The Industrial General Permit Training Team, the Water Board, Office of Water Programs, and CASQA have been working hard to make it a reality and it looks like the training program will become accessible to the public by the scheduled date of

May 1

Trainers of Record (who will be teaching the in-person third day of training) already have access to the online portion of the training.

According to the CASQA website the following are the steps involved in becoming a QISP:

To access the program, log into www.owp.csus.edu.

1. Complete 16 hours of online training

Training consists of videos, quizzes, and reading assignments. You may take the self-assessment quizzes as often as you like. Quiz grades do not affect your completion of the training. However, you do need to understand the material presented in the online training to pass the exams.

2. Pass a midterm exam

You have two attempts to pass the 35-question midterm with a grade of 70% or higher. The exam must be completed in a single two-hour session.

3. Complete the one-day, in-person training with an IGP ToR

After passing the midterm exam, register for the in-person ToR training via the class calendar at www.owp.csus.edu.

4. Pass the final exam

You have two attempts to pass the 70-question final exam with a grade of 70% or higher. The exam must be completed in a single four-hour session.

Included with this edition of *The Rain Events* is the QISP Fact Sheet which was prepared by the IGPTT, the Water Board, and CASQA to answer other questions that you may have about the QISP program.

Please contact us if you have any questions ...

The Rain Events

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Technical Questions about Environmental Compliance?

Call ...

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The California Stormwater Industrial General Permit (IGP) glossary defines a Qualified Industrial Stormwater Practitioner (QISP) as:

“Only required once a Discharger reaches Level 1 status, a QISP is the individual assigned to ensure compliance with this General Permit or to assist New Dischargers with determining coverage eligibility for discharges to an impaired water body. A QISP’s responsibilities include implementing the SWPPP, performing the Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation), assisting in the preparation of Annual Reports, performing ERAs, and training appropriate Pollution Prevention Team members. The individual must take the appropriate State-approved or sponsored training to be qualified. Dischargers shall ensure that the designated QISP is geographically located in an area where they will be able to adequately perform the permit requirements at all of the facilities they represent.”

Purposes Identified by the IGP for having QISPs

- To improve compliance and maintain consistent implementation of the IGP (Finding #49);
- To assist the Discharger and other on-site personnel with the implementation of IGP requirements (Finding #50);
- To have a high degree of technical knowledge and environmental experience in the assistance given to Dischargers (Fact Sheet p. 6);
- To improve the quality of the data submitted (Fact Sheet p. 20); and
- To avoid costly retrofits or closure of new facilities that cannot demonstrate that the facility will not cause or contribute to a 303(d) impairment (Fact Sheet p. 26).

Ten QISP Roles According to the IGP

1. May represent one or more facilities but must be able to perform the functions required by the IGP at all times (Fact Sheet p. 28).
2. Assigned to a facility that reaches Level 1 and Level 2 status (Fact Sheet p. 48).
3. More accurately identify discharge locations representative of the facility’s stormwater discharge (Fact Sheet p. 48).
4. Select and implement appropriate sampling procedures (Fact Sheet p. 48).
5. Evaluate and develop additional BMPs to reduce or prevent pollutants in industrial stormwater discharges (Fact Sheet p. 48).
6. Assist with the completion of the Level 1 Evaluation and preparation of the Level 1 ERA Report (Fact Sheet p. 61).
7. Assist with the completion of the Level 2 ERA requirements and the preparation of the Level 2 Action Plan & Level 2 Technical Reports (Fact Sheet p. 62).
8. Assist New Dischargers in preparing the Stormwater Pollution Prevention Plan (SWPPP) and monitoring program in addition to gaining coverage for New Dischargers that discharge directly to an impaired water body (Order p. 22).
9. Provide training to “appropriate team members” for Level 1 facilities (Order p. 23 & 33).
10. Be informed, responsible, and attentive to the required duties of a QISP while keeping the QISP registration in good standing with the State Water Board and the California Stormwater Quality Association (CASQA) (Fact Sheet p. 28).

Becoming a QISP

Sign up for the QISP Training Program by going to the California State University, Sacramento Office of Water Programs (OWP) website at www.owp.csus.edu.

After creating an account, click [Stormwater Certificates](#), then [IGP QISP](#). The website guides you through the process of completing the QISP Training Program.

QISP Training Program FAQs

Are there prerequisites or underlying certifications required to be a QISP?

There are no formal prerequisites to be a QISP. There is, however, a practical prerequisite. The material presented in the QISP Training Program was developed for QISP candidates who have basic knowledge of stormwater principles, working knowledge of the IGP, and experience implementing industrial stormwater compliance. This program is not designed for a “Stormwater 101” audience.

How much time is a QISP candidate allowed to complete the QISP Training Program?

The training program must be completed within one year of the initial registration date. If your registration expires before you complete all steps in the program, you would need to re-register and restart the QISP Training Program.

More QISP Training Program FAQs

How do I become a QISP?

To become a QISP, candidates must complete the online training; pass a midterm exam; attend a one-day, in-person class; and pass a final exam.

How long will the online training take?

On average it takes 16 hours to complete the self-study online training material. This consists of videos, site scenarios, readings from the IGP, information from the CASQA Industrial and Commercial BMP Online Handbook, and quizzes.

How many attempts does a QISP candidate have to pass the midterm and final exams?

The QISP candidate is allowed to take each exam twice. If the candidate does not pass the midterm exam in two attempts, the candidate must pay to re-register and retake the online training.

If the candidate does not pass the final exam in two attempts, the candidate must pay to re-register, retake the online training, complete the midterm with a passing grade, and attend another one-day, in-person class before re-attempting the final exam. A separate fee may be charged for each class attended.

How do I register for an in-person IGP Trainer of Record (ToR) class?

After passing the midterm, the QISP candidate needs to attend a one-day in-person class with a IGP ToR. Register for a class by visiting the training calendar in the Stormwater Certificates portal at www.owp.csus.edu. A separate fee is charged for this class by the IGP ToR, who will provide payment instruction. When you complete the class, the IGP ToR records your pass/fail in the system. Candidates who pass the class are eligible to take the final exam.

Note that IGP ToRs are required to verify the identity of QISP candidates and their attendance for the completion of the one-day, in-person class. QISP candidates must be attentive during class.

Do California-registered Professional Engineers and Geologists need to take this training?

California licensed professional civil, industrial, chemical, and mechanical engineers and geologists have licenses that have professional overlap with topics in the Industrial General Permit. The California Department of Consumer Affairs, Board for Professional Engineers, Land Surveyors, and Geologists (CBPELSG) provides the licensure and regulation of professional civil, industrial, chemical, and mechanical engineers and professional geologists in California. The State Water Board developed a specialized self-guided State Water Board-sponsored registration and training program specifically for these CPBELSG licensed engineers and geologists in good standing with CBPELSG. To complete the training and self-certification, create an account on the Office of Water Programs website at www.owp.csus.edu. Click [Stormwater Certificates](#) then click [IGP CBPELSG](#).

What is required to renew the QISP training registration?

The State Water Board, CASQA, and IGP Training Team have not yet determined what is required to renew the QISP training registration. More information will be provided as the date approaches.

What if a QISP Candidate has a disability, such as hearing impairment, that requires special accommodations to access online class material in the QISP Training Program?

To request online training accommodations, contact Office of Water Programs by email at wateroffice@owp.csus.edu or by phone at (916) 278-6142. Please plan ahead to give yourself adequate time to coordinate your accommodation needs with the Office of Water Programs and to complete your QISP training.

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|--------------|---|
| 9:00-10:00 | Industrial General Permit: When you might need LID |
| 10:00 -10:15 | Break |
| 10:15-11:00 | Construction General Permit: Post-construction Requirements |
| 11:00-12:00 | City of Redding MS4 General Permit Requirements |
| 12:00-1:15 | Lunch (no host) |
| 1:30-2:45 | LID-A Holistic Approach to Achieving Stormwater Permitting Compliance |
| 2:45-3:00 | Break |
| 3:00-4:00 | LID-Practical Installation Methods and Overcoming Common Hurdles |

Gwen Erickson, PG, CCP/IGP TOR • gerickson@shn-engr.com • 707-441-8855
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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's question was:

Under the current Industrial General Permit, a volume-based Advanced Treatment BMP needs to be sized to handle what kind of storm event based on local historical rainfall records?

Way to go, Edward Flores - you are correct! The Industrial General Permit requires volume-based Advanced Treatment BMPs to be **sized according to the volume of runoff produced from an 85th percentile 24-hour storm event, as determined from local, historical rainfall records.**

Edward wins \$25 to Panera Bread!

This Month's Contest Question:

True or false? The Annual Comprehensive Facility Compliance Evaluation (ACFCE) must be performed during the month of May.

By May 13, 2016, submit your response to the above question by sending an email to jteravskis@wgr-sw.com. All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift cart to Jamba Juice.



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SAVE THE DATE!

QISP TRAINING CLASS

TUESDAY MAY 17, 2016 (8:00 AM - 4:30 PM)

MEET THE TRAINERS



JOHN TERAUSKIS

ToR, QISP, CPESC, QSD/QSP

John is WGR's lead trainer for many different storm water-related classes, and is a part of the Industrial General Permit Training Team, a collaboration that assisted the State with developing the QISP training program.



AARON ORTIZ

ToR, QISP

Aaron is WGR's in-house expert on the Industrial General Permit, and one of the senior editors of The Rain Events. Aaron has extensive experience with storm water training, and also assisted with the Industrial General Permit Training Team.

In order to take this one-day training class, each QISP candidate will need to register for and complete the state-approved online QISP training course from CASQA. This course will be available to the public in early May 2016 - watch CASQA's website for more information.

RESERVE YOUR PLACE NOW!

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