

the *Rain* events

MONTHLY INSPECTIONS

a look at the new regulations

For over twenty years, facilities under the Industrial General Permit have become accustomed to conducting quarterly visual observations around their facility property. But on July 1, 2015, all of that changed. Now, the new Industrial General Permit (Order 2014-0057-DWQ) is requiring permittees to conduct visual observations of their facilities *on a monthly basis*. This edition of *The Rain Events* features a brief refresher on visual observations – including what needs to be covered during each inspection – and offers some tips on documenting the findings.

The requirement for monthly visual observations can be found in Section XI.A.1 of the Industrial General Permit – which clearly states that “At least once per calendar month, the Discharger shall visually observe each drainage area.” Subsection XI.A.1.b gives a few more details, stating that these observations “shall be conducted during daylight hours of scheduled facility operating hours and on days without precipitation.” Given this information, it is important to note a couple things – first, **these monthly inspections are not sampling events**. The permit clearly says these inspections are to be performed on days *without precipitation (rain)*. The purpose of these inspections is to determine if there are any non-storm water discharges (NSWDs) occurring at the facility, or if any industrial materials are (or could) cause a pollution problem. Secondly, **the inspections are to be performed during normal business hours**. Performing these inspections during normal industrial activity helps to ensure that your observations accurately reflect what is happening at your site.

So you’re walking around the facility with a clipboard in hand, ready to do the monthly inspection. What exactly should you be looking for? The Permit lists three things to be on the lookout for: **First, look for “indications of prior, current, or potential unauthorized NSWDs and their sources.”** What is an unauthorized NSWD? Simply put, it is anything that doesn’t appear on the list of authorized non-storm water discharges found in Section IV of the Permit. Look for current non-storm water flows, but also look for indicators of past flows, and keep an eye out for situations which could potentially cause a non-storm water discharge. **Second, look for “Authorized NSWDs, sources, and associated BMPs to ensure compliance with Section IV.B.3 [of the Permit].”** Again, only if it appears on the list in Section IV of the Permit can it be classified as an “authorized non-storm water discharge.” If you see an authorized non-storm water discharge, don’t

just dismiss it and walk on. Section IV.B.3 has a list of BMPs that should be reviewed to see how many are being implemented for each authorized non-storm water discharge. **Third, look for “Outdoor industrial equipment and storage areas, outdoor industrial activities areas, BMPs, and all other potential source of industrial pollutants.”** Basically, be on the lookout for situations that could cause an unauthorized NSWD, or contaminate storm water runoff.

Once the inspection is finished, there is still work to be done. According to the Section XI.A.3 of the Permit, you will need to record the date and approximate time of your inspection, the locations observed, the presence and probable source of any observed pollutants, the name of the inspector, and any response actions or needed SWPPP revisions. This is quite a bit of information – to make the inspection process a little easier, it’s a good idea to create an intuitive form that can be filled out during the actual inspection. Not only is this a whole lot simpler; it also ensures that the inspector doesn’t forget any important information.

Visual observations are an important element of keeping your facility compliant, and are not something that can be overlooked or classified as “I’ll get around to it when I can.” You will have to account for all of your monthly observations in your facility’s Annual Report, and will be required to give an explanation for any months that were missed. Because of this, we at *The Rain Events* recommend setting up a schedule for performing the monthly visual inspections, such as the first Monday of each month. Of course, the schedule may need to be changed slightly depending on weather conditions, but try to stick as close as possible to the schedule. Check out *The Compliance Corner* for links to some forms that we created especially for monthly visual observations. ☔

the Compliance corner

Monitoring Forms

In preparation for the new Industrial General Permit, WGR Southwest, Inc. redesigned all of the forms used for recording monitoring data – such as monthly visual inspections, storm water sampling visual observations, and the Annual Comprehensive Facility Compliance Evaluation. And now, we are offering these forms for free to readers of *The Rain Events!*

Form 1: Sampling Event Visual Observations and Analytical Results

Use this form to record your visual observations taken during a sampling event. This form comes with a Qualifying Storm Event Evaluation, a section to record observations, and a corrective action summary. The second page of the form contains a table where all of the analytical results can be recorded.

Form 2: Monthly Visual Observations

Like the main article says, dischargers under the new Industrial General Permit are required to inspect their facilities on a monthly basis. Use this form to record your observations and assessments of non-storm water discharges.

Form 3: Annual Comprehensive Facility Compliance Evaluation

This form is for recording the findings of the Annual Comprehensive Facility Compliance Evaluation. There are sections on this form for a review of the facility monitoring records, an inspection of the facility grounds, equipment inspections, and an assessment of the information needed for the Annual Report.

Click here to download all of these forms.

<http://wgr-sw.com/bigfiles/IGP%20Monitoring%20Forms.zip>

Need a SWPPP revision for the new permit?
Give us a call at (209) 334-5363, ext. 114

“To Do List” for August:

- ☛ Perform the August monthly inspection
- ☛ Schedule your Fall storm water training for facility personnel.
- ☛ Inspect your facility for housekeeping and maintenance items that need to be addressed before the rain season begins.

Storm Water Awareness Week 2015

We are excited to announce that workshop registrations have now begun. Visit our website to register - and you won't want to miss our keynote sessions!



Please contact us if you have any questions ...

The Rain Events

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STORM WATER AWARENESS WEEK 2015
KEYNOTE SESSION
WHY IS A STORM WATER AGENCY CONCERNED ABOUT FISH?
JEFF McLAIN
NOAA FISHERIES - WEST COAST REGION
LIVE BROADCAST
MONDAY, SEPTEMBER 21
12:00 PM
WATCH FOR FREE AT
WWW.STORMWATERAWARENESS.ORG

Keynote #1:
Why is a Storm Water Agency Concerned About Fish?
Featuring
Jeff McLain,
Division Manager,
NOAA Fisheries,
West Coast Region

Monday,
September 21, at
12:00 PM

STORM WATER AWARENESS WEEK
STORM WATER AWARENESS WEEK 2015
KEYNOTE SESSION
FEATURING QUESTIONS AND ANSWERS ON THE NEW INDUSTRIAL GENERAL PERMIT
LAUREL WARDDRIP
INDUSTRIAL PROGRAM MANAGER
STATE WATER RESOURCES CONTROL BOARD
LIVE BROADCAST
WEDNESDAY, SEPTEMBER 23
12:00 PM
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Keynote #2:
Questions and Answers on the New Industrial General Permit
Featuring
Laurel Warddrip,
Industrial and
Construction
Program Manager,
State Water
Resources Control
Board
Wednesday,
September 23, at
12:00 PM

CHANGE YOUR COURSE!

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*A single NAL exceedance will change your
facility from Baseline to Level 1.*

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- Appoint a QISP
- Perform a Level 1 Evaluation
- Evaluate the Need for Additional BMPs
- File a Level 1 ERA Report

Level 2 Dischargers must:

- Further Evaluate BMP Options
- Install additional BMPs, which may include structural or mechanical devices
- Prepare a Level 2 Action Plan

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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...

What is the easiest and best way to find the list of impairments for your local HUC-10?

Congratulations, Sejin Oh - you are correct! The best and easiest way to find out the impairments in a HUC-10 watershed is to **use the tool the State has provided on the SMARTS system.**

Sejin wins a \$25 gift card to Jamba Juice for a refreshing Strawberry Whirl!

This Month's Contest Question:

What weather conditions are best for performing Monthly Visual Observations?

By September 11, 2015, submit your response to the above question by sending an email to 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 Outback Steakhouse.



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