

Did you know there are reasons NOT to sample?

Quite often, a lot of our time is spent identifying the times industrial facilities **should** be sampling, but are you as familiar with the reasons a facility **should not** sample? Sometimes collecting a sample from every storm event which pops up in the forecast isn't the best option in the long run for your facility. This month's edition of **The Rain Events** is dedicated to why you should **not** sample at your facility (but also includes some reminders about when you **should** sample). For the good of your facility, budget, storm water compliance program, and safety keep reading...

Not every storm that comes along is a qualifying rain event. So how do I know what qualifies as a Qualifying Storm Event (QSE)? Well first of all, there needs to be 48 hours of no discharge between QSEs. This doesn't necessarily mean 48 hours without precipitation – it could drizzle on and off for two days before enough rain falls to cause a discharge, which would trigger the start of the QSE. Once discharge starts at your facility, the Permit gives a 4-hour window for collecting samples. If the discharge started during non-business hours, the Permit makes allowances for this by giving facilities a 4-hour window to collect samples when business hours begin for the day, provided that 12 hours have not elapsed since the discharge began.

As you may have found out from this year's slew of storms, sometimes sampling times begin when sampling is least likely to happen. **Samples don't need to be collected outside of the required sampling window.** For example, if a storm dumps rain on your facility over the weekend or holiday – which happens to be during non-business hours –

you don't have to sample. Another example is if the breaks in the weather patterned are timed so as to not allow the needed 48-hour dry period between storm events which would re-trigger the need to sample. Because, remember, you only need to sample ONCE within 4 hours of the start of discharge during business hours; or within 4 hours of the start of business if the discharge happened within the previous 12 hours. If there isn't a window of 48 hours of no discharge (note that this is not talking about no rain, but rather no discharge) before the next discharge begins, it disqualifies the event. Which also applies if the discharge started outside of the time frame of sampling.

If the weather pattern moving through is unsafe, **you do not have to sample if it puts you in danger.** Due to the high amounts of precipitation and miles per hour of wind which accompany an atmospheric river, or an electrical storm producing lightning and hail, there are some considerably unsafe conditions which would trigger the safety clause of the Permit.

Flooding streets and even freeways, rapidly rising water, saturated soils, falling trees, downed power lines, unstable slopes, and visibility issues are all unsafe conditions. Never put yourself in a hazardous situation where you could get trapped. Talk with your supervisors if the facility is unsafe or if you feel uncomfortable continuing with work, inspections, or monitoring. Document the facility conditions and weather conditions as proof of why monitoring couldn't be done. According to the Permit, dischargers are not required to conduct visual observation during dangerous weather conditions such as flooding and electrical storms. *"In the event that samples are not collected, or visual observations are not conducted in accordance with Section XI.B.5 due to these exceptions, an explanation shall be included in the Annual Report."* If you feel it is not safe to inspect or sample, follow your instincts!

Don't sample from water that does not discharge, such as retention basins and storm water ponds. However, with the record amount of rain we have received this year, you may have ponds that will discharge

this year that normally do not discharge." **Even though you haven't grabbed samples in years, you should always be ready to grab samples.** Don't be caught by surprise if ponds start discharging which normally never have a discharge. Take note of how full your pond is prior to the start of the rain, and have a sampling kit assembled and on hand just in case there is a discharge. Make sure your staff is trained in what to do in the case of a discharge or pond overflow. This year we have seen a lot of crazy storms dump rain across our State in record amounts – flooding has been a big problem. Even though you, more often than not, will not have to sample because of your pond's retention capacity, don't ignore the possibility. Be prepared.

If you do have a discharge and it meets the criteria, and you haven't collected all the necessary samples for the year, sample it by all means. As long as it meets the requirements of Section XI.B of the Permit – *a storm event that produces a discharge from at least one drainage area and is preceded by 48 hours with no discharge*. However, if you've already collected the required number of samples per reporting period, **don't rush out to grab extracurricular samples.** Sometimes less is more. You are not required by the Permit to collect more than the 4 samples per reporting year (2 samples collected between July–December, and 2 samples collected between January–June.) Extra sampling may look good for your compliance program, but it's not necessary and can potentially create a problem if an exceedance randomly occurs and tips the scale for your facility. You can't pick and choose which of the many samples you collected gets reported on your annual report. If you don't have to sample the storm event, don't!

If at the time of sampling you notice that storm water is getting past your BMPs, collect samples of the bypass. According to the Permit, *"Any Discharger employing volume-based or flow-based treatment BMPs shall sample any bypass that occurs."* Consider the bypass flow as non-treated water on the loose through your facility. **Don't ignore this**

bypass overflow as just "good ol' clean water," it's not.

You do not need to sample the run-on to your facility because it is not representative of your facility.

According to the Permit, *"The Discharger is required to identify, when practicable, alternative discharge locations for any discharge locations identified in accordance with Section XI.B.4 if the facility's discharge locations are:*

- i. Affected by storm water run-on from surrounding areas that cannot be controlled; and/or,*
- ii. Difficult to observe or sample (e.g. submerged discharge outlets, dangerous discharge location accessibility)."*

Meaning, if your facility is getting a lot of water running onto it from outside sources, you don't have to sample that water since it won't be representative of your facility's industrial activities and sources of pollutants. However, that doesn't mean that you get out of sampling due to run-on or flooding from adjacent locations. You will still need to sample at the identified alternative discharge location for your facility which won't produce results for commingled discharges.

If wildfires have shut down your facility and you have filed for the exemptions provided by the Water Board for that situation, **you do not have to collect samples outside of those provisions.** In October 2020, the Water Board wrote a letter recognizing the public health and environmental impacts within the counties identified in the Governor-declared state of emergency proclamation due to wildfires. "This letter provides the following guidance for regulatory compliance with the Statewide Industrial Stormwater General Permit for industrial facilities damaged and/or negatively impacted by wildfires within counties identified in a state of emergency proclamation. Negative wildfire impacts on industrial facilities may include higher levels of pollutant in the facility's stormwater discharges that are unrelated to the facility's industrial activities." According to the Permit (Section XI.B), dischargers are

required to sample and report industrial storm water runoff sampling results, however due to this emergency response letter, dischargers may now claim their industrial storm water runoff samples as unrepresentative of their facility operations and document it as such. By "identifying and reporting the stormwater samples impacted by wildfire conditions (including post-wildfire conditions), collecting and reporting photographic documentation, and reporting the basis for why the industrial activity area runoff samples are not representative of the facility activities and operations."² This exemption from the sampling requirements of the Permit must be authenticated by factors such as: the discharge location conditions; photographs of the facility, discharge locations, and surrounding lands impacted by wildfires; facility operation status and condition; areas of high erosion and high collection of ash deposits; information on any facility observations prior to a rain event, BMPs currently implemented to manage runoff of industrial pollutants and to manage wildfire-related impacts at the facility; BMPs planned for implementation to manage runoff of industrial pollutants and to restore wildfire-related impacts at the facility; and comparisons of historical facility sampling results from drainage areas to the sampling results collected post-wildfires. Visual observations are still required (if conditions and safety allow) and must be submitted along with the analyzed sample results on SMARTS within 30 days of receiving lab results. Dischargers should include information in their Ad Hoc about non-representative sample results and include the information listed above.

¹<https://www.fs.usda.gov/treearch/pubs/58606>

²https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/industrial/igp_wildfire.pdf

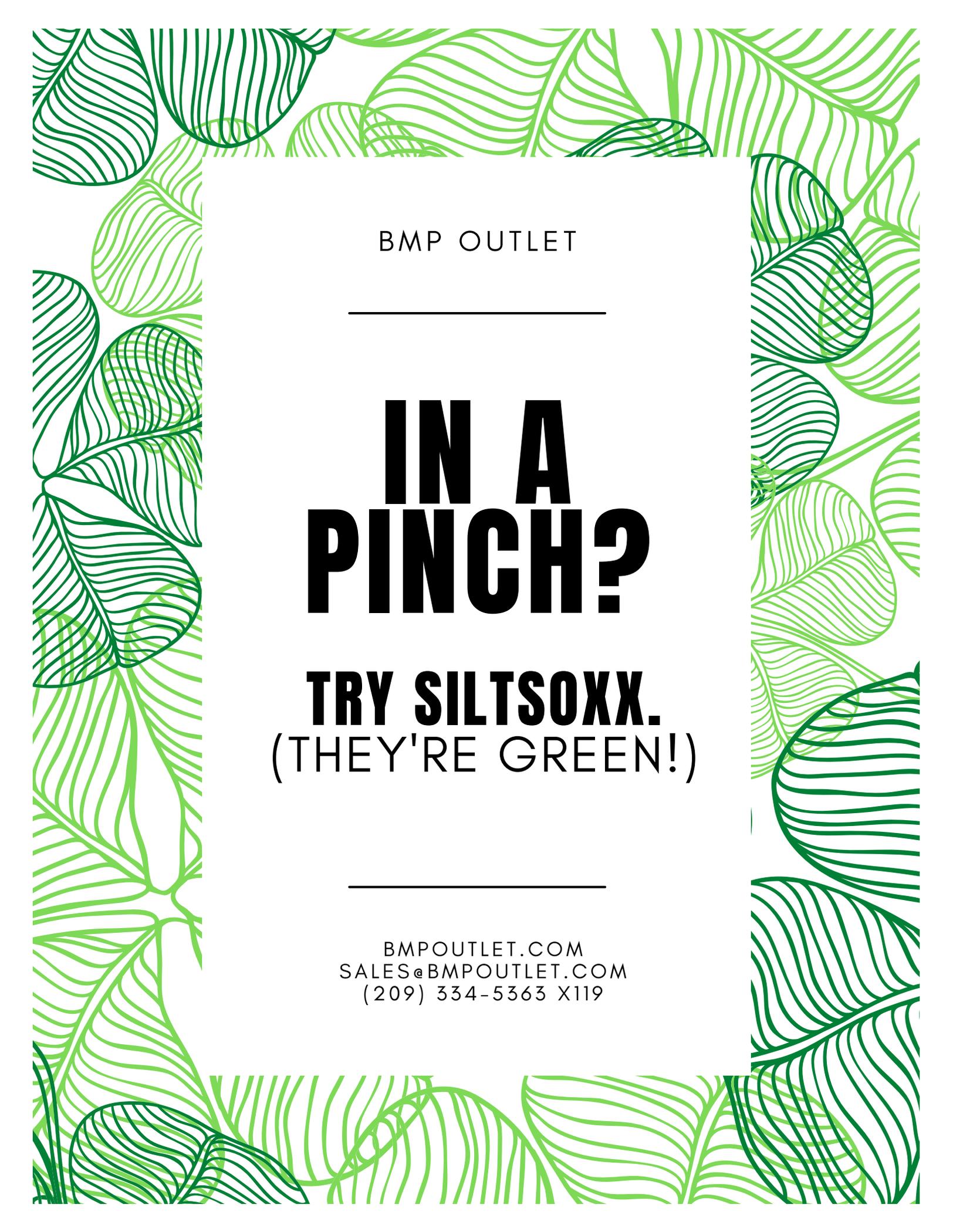
The Rain Events

Lead Editor: John Teravskis
QSD/QSP, QISP, CPESC, ToR, IGPTT Participant
jteravskis@wgr-sw.com
(209) 334-5363 ext. 110 or (209) 649-0877

Supporting Editors:

Aaron Ortiz, QISP, ToR, aortiz@wgr-sw.com
(209) 334-5363 ext. 114

Rebekah Teravskis, rteravskis@wgr-sw.com
(209) 334-5363 ext. 118

A decorative border of green line-art leaves surrounds the central text. The leaves are stylized with fine lines and are arranged in a dense, overlapping pattern.

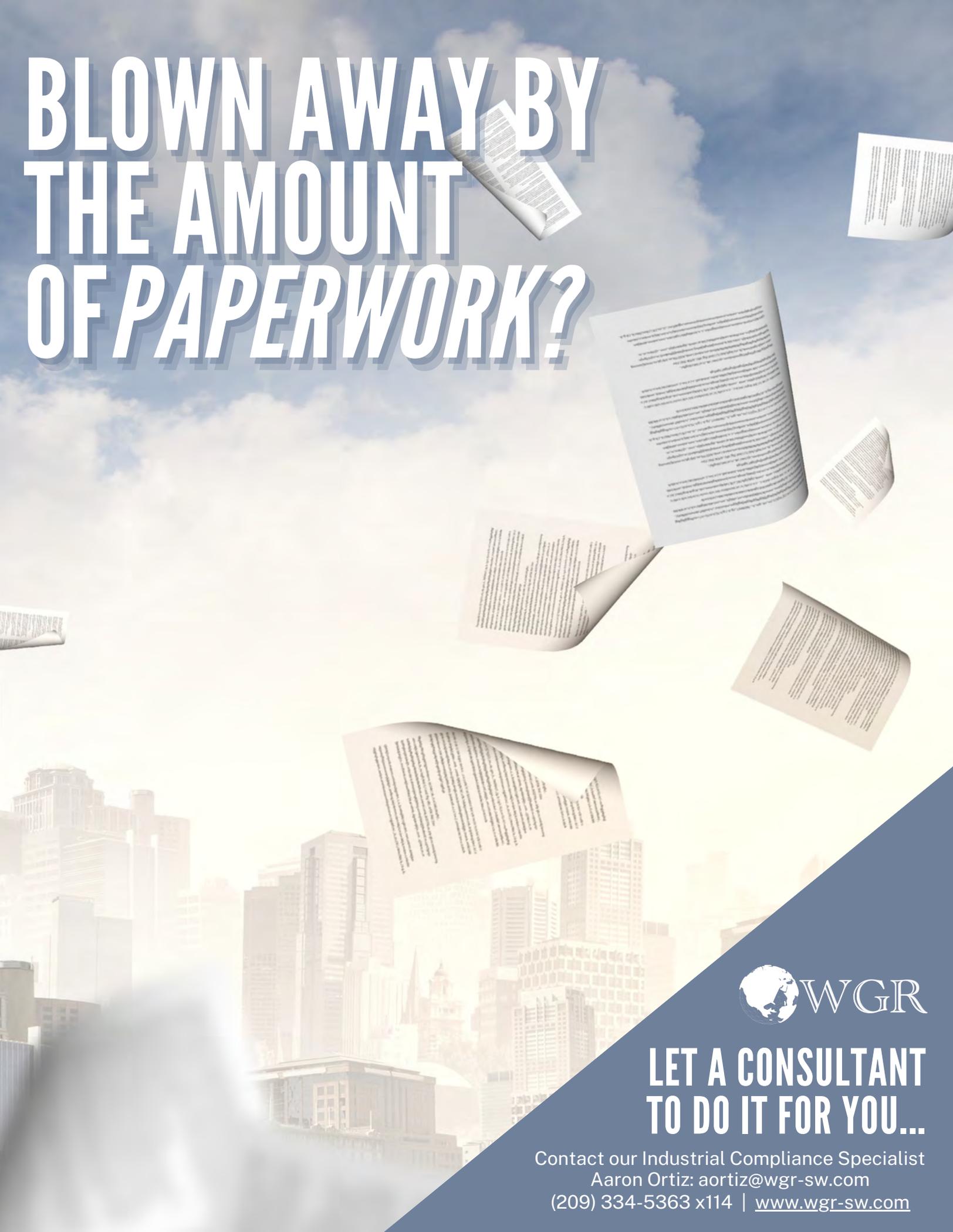
BMP OUTLET

**IN A
PINCH?**

**TRY SILTSOXX.
(THEY'RE GREEN!)**

BMPOUTLET.COM
SALES@BMPOUTLET.COM
(209) 334-5363 X119

BLOWN AWAY BY THE AMOUNT OF *PAPERWORK?*



**LET A CONSULTANT
TO DO IT FOR YOU...**

Contact our Industrial Compliance Specialist
Aaron Ortiz: aortiz@wgr-sw.com
(209) 334-5363 x114 | www.wgr-sw.com



FORGE

Tailgate Safety

funny, true-to-
life & **applicable**
safety trainings
only \$17.99/month

*course includes 12 lessons

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. Last month's contest question was:

What three things do you need to observe each drainage area for?

Congratulations to Brian who replied "1st- look for NSWD's; 2nd- Look for signs of past NSWD's; 3rd- Look for equipment or other items on your property that could cause or allow pollutants to enter into the storm water." Brian, we hope you enjoy shopping from Lowe's for you next project!

...This Month's Contest

What are three reasons NOT to sample at your industrial facility?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, April 7th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a \$25 gift card to Amazon.

GET SOCIAL:



WWW.WGR-SW.COM

WANT TO STRENGTHEN YOUR CRAFT? CHECK OUT [FORGE](#) - AN ONLINE LEARNING PLATFORM.