

# MONOPOLY



**WHERE YOU LITERALLY PUT MONEY INTO YOUR DRAINS.**

Does your storm water program ever remind you of playing Monopoly? Paying everyone and their brother money, spending everything you've got to improve your property, and trying to avoid landing on your neighbor's property. Well, with the implementation of the new Industrial General Permit amendments, the game rules have changed! This month, we're going to give you **The Rain Events** guide on the updated rules for **Monopoly: Storm Water Edition**.

**Passing "Go":** For you brave facilities who just joined the game, welcome! You've got some work ahead of you, but you're not playing alone. We've got a regular [community chest of free education resources](#), so don't feel you have to take a chance on your own. And for all of you who have gone around the board a few times, don't forget to feed your mind with [continuing education](#)! It's important to stay sharp and hone your craft, even when you've been doing this job for years.

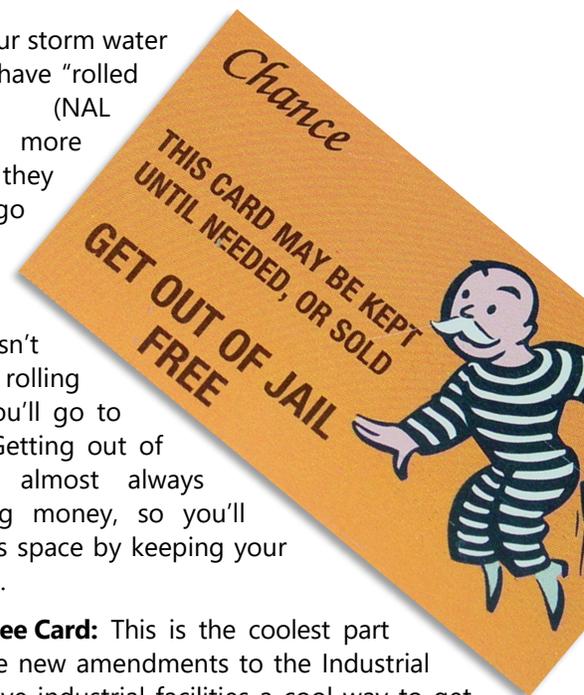
**The Reading Railroad:** Guess what? You've got to read and understand the [Industrial General Permit](#). This isn't anything new, but it's a great reminder. It may seem like a lot of time to invest for little return, but trust us – the better you know the Permit, the better you'll play the game. You're also a whole lot less likely to spend time in ERA jail.

**Utilities:** Just like storm water sampling, they're never really expensive, but always come at the worst time. Well, the new game rules have a few changes that impact the way industrial facilities analyze their water samples. They're calling it ["Sufficiently Sensitive Test Method Ruling."](#) The [EPA updated the Clean Water Act to mandate that NPDES permits](#) require analytical test methods that measure and quantify pollutants at levels identified in the NPDES permit requirements. Facilities must use test methods sufficiently sensitive enough to detect pollutants at or below the applicable water quality criteria.

**Boardwalk:** Or, ["The New TMDL Requirements."](#) You might drop a lot of money here. The EPA updated the TMDL requirements so as to aid in the restoration of impaired water bodies. [Attachment E](#) contains the pollutant and water body specific TMDL requirements applicable to discharges of industrial storm water within specified geographical locations. But in the new version of the game, the Get Out of Jail Free card can work here too!

**Go To Jail:** If your storm water analytical results have "rolled double digits" (NAL exceedances) more times than they should, you go directly to jail – or more properly, "ERA Level 1." If this isn't your first time rolling high numbers, you'll go to "ERA Level 2." Getting out of Level 1 status almost always involves spending money, so you'll want to avoid this space by keeping your storm water clean.

**Get Out of Jail Free Card:** This is the coolest part of the game. The new amendments to the Industrial General Permit give industrial facilities a cool way to get out of TMDL or NAL troubles, called the ["Statewide Options Incentivizing On-Site or Regional Storm Water Capture and Use."](#) The newly amended [Attachment I](#) contains new compliance options incentivizing storm water capture. And look at the incentives: *"Upon implementation and operation of the BMP(s), and compliance with the On-Site Compliance Option requirements in Attachment I, the status of Baseline, Level 1, or Level 2 is no longer applicable."* Woah! This new compliance option has the potential to get you out of a lot of hot water. There are two options given for storm water capture – On-Site or Off-Site. The first option emphasizes onsite storage and infiltration with no ground water impacts. The second option allows for diversion of storm water to the sanitary sewer or other utility. While these incentives are new



to the IGP, they are not actually required to be implemented into every industrial storm water program, but rather are considered an optional incentive. For the On-Site compliance option, facility operators choose to implement best management practices that capture, infiltrate, divert and/or evapotranspire the volume of runoff produced up to and during the 85<sup>th</sup> percentile 24-hour rain event based on historical precipitation data and records. However, all storm water entering the On-Site compliance option must meet the applicable Maximum Contaminant Level (MCL) criteria (drinking water standards) or have a PE approved pretreatment with an operation and maintenance plan, as well as an installed monitoring device.

But this Get Out of Jail Free card has two parts! For the Off-Site compliance option, facility operators choose to partner with municipalities or other jurisdictions to which they will send their storm water runoff to be captured through BMPs, infiltrated, diverted, and/or evapo-transpired. While this option may be a little less feasible, it too has incentives. "A discharger participating in an approved local agreement and discharging into an Off-Site BMP(s) and in compliance with the Off-Site Compliance Option requirements in this Attachment, are exempt from the following provisions and requirements of this General Permit:

1. Section VIII.A Discharges to Ocean Waters;
2. Section IX Training Qualifications, the requirement to obtain a QISP;
3. Section X.A.7, X.H.2. Implementation of Advanced BMPs;
4. Section X.H.6 Design Storm Standards for Treatment Control BMPs;
5. Section X.I.3-5 Monitoring Implementation Plan;
6. Section XI.A.2 Sampling Event Visual Observations
7. Section XI.B Sampling and Analysis; and,
8. Section XII Exceedance Response Actions." [https://www.waterboards.ca.gov/water\\_issues/programs/stormwater/docs/industrial/unoff\\_igp\\_amend.pdf](https://www.waterboards.ca.gov/water_issues/programs/stormwater/docs/industrial/unoff_igp_amend.pdf)

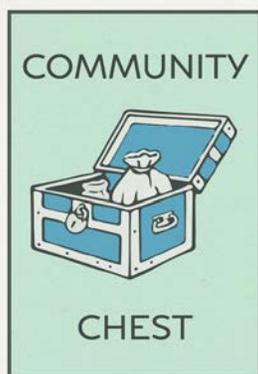
While the Off-Site option may be prohibited in some areas, it is good to note that facilities meeting all implementation requirements for either of these options will be deemed fully compliant with multiple IGP requirements, including those related to TMDL implementation. Both options have very specific design standards and are required to be certified by a PE.

OK, well we're obviously having fun comparing the new amendments to a board game. Storm water compliance is no game, and weak attempts at humor aside, the new amendments may have some serious benefits for your storm water compliance program. Take some time and study the current Permit as well as the newly adopted amendments to find out exactly how they will apply to your individual facility. And don't forget—we're here to help if you have any questions!

## Community Education!

The Rain Events and our sister newsletter The Monthly Dirt were created specifically to provide free education to the storm water community. But if you need more training, we've got other resources for you too! Check out these offerings:

- **SWPPPradio.org.** It's a podcast focused solely on storm water compliance issues—and it's free!
- **Storm Water Awareness Week.** An annual free training event. View past keynote sessions for free.
- **FORGE: Strengthen Your Craft.** An online training resource, with over 40 hours of quality training! All at an affordable price.
- **The Monthly Dirt.** A monthly newsletter for those living under the Construction General Permit.



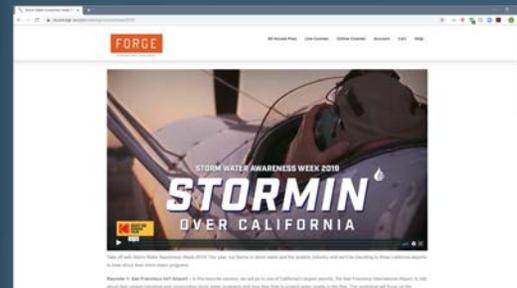
## "To Do List" for October

- ☁ Perform the October monthly inspection
- ☁ Get your BMPs ready to go for the rain season! If they're worn out and dirty, they may need to be replaced. This is the start of the wet season, so **don't let your BMPs handicap your storm water numbers.**
- ☁ It's a great time of year get in your IGP Section X.H.1.f annual training.
- ☁ Get your sampling kit ready and coordinate with the environmental testing laboratory.



## Storm Water Awareness Week 2019

It's been another successful year for Storm Water Awareness Week, thanks to all who were involved! Remember, you can access all of the recorded classes and keynotes, year-round, on the FORGE training website!



Do you follow us on social media?  
Find out what we're up to on  
[Facebook](#) or [Instagram](#)!



Please contact us if you have any questions ...

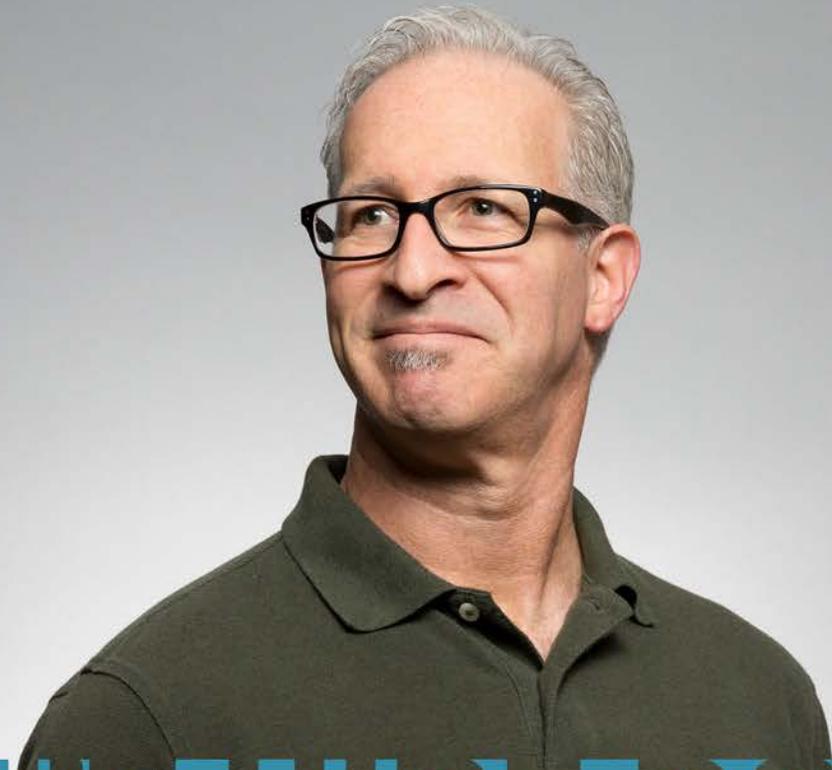
## The Rain Events

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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. Last Month's question was:

Where does the clean water act give citizens the right to sue?

Congratulations **Sherri Santellan**, you won! Section 505 of the Federal Clean Water Act (33 U.S. Code Chapter 26, Subchapter V, Section 1365) authorizes citizens to sue in instances where the federal and state government has not taken enforcement action and extracted a penalty for the violations. Sherri wins a \$25 gift card to Amazon!

## This Month's Contest Question:

### WHAT ARE YOUR PERSONAL MONOPOLY BOARD GAME HOUSE RULES?

In keeping with this month's theme, we will pick our favorite Monopoly House Rule entry to win the giveaway. Submit your answers by Friday, September 27th. Email your answer to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). One winner will be selected by a random drawing to receive a \$25 gift card to Starbucks



## Did You Know?

- ◆ The Monopoly game is based on Atlantic City, New Jersey.
- ◆ Charles Darrow first developed the Monopoly game in 1933.
- ◆ The original game was made from a piece of oilcloth-covered board and handwritten cards.
- ◆ The original Monopoly tokens were inspired by Darrow's nieces who recommended metal tokens like those on charm bracelets be used. The original game included 10 metal tokens including iron, purse, lantern, race car, thimble, shoe, top hat, battleship, cannon and a rocking horse.
- ◆ Darrow attempted to sell the Monopoly game to Parker Brothers, but was initially rejected for "52 fundamental errors" that included the game's length, theme and complexity. Darrow then sold the game to a Philadelphian department store, and the game became an instant success. Following the local success of the Monopoly game, Parker Brothers reconsidered their initial rejection and negotiated the rights to market the game.
- ◆ The total amount of money in a standard Monopoly game is \$20,580.