
Industrial General Permit QISP/ToR Forum



QISP Certification Requirements and Exam Statistics

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QISP Certification Requirements

1. Confirm they have read the IGP
2. Confirm they have read the SWRCB's guides to SMARTS
3. Complete short questionnaire
4. Complete online training course (includes 35 quizzes)
5. Pass midterm exam with score of 70% or better (one retake allowed)
6. Complete a one-day, in-person training with IGP QISP ToR
7. Pass final exam with score of 70% or better (one retake allowed)

Midterm and Final Exam Statistics (through August 2018)

- Midterm Exam
 - Total attempts: 926
 - Pass rate: 98.4%
 - Average grade: 90.4%
- Final Exam
 - Total attempts: 861
 - Pass rate: 85.8%
 - Average grade: 77.8%

Main QISP Duty

Concept	Total Attempts	Correct Attempts	Percent Correct
SWPPP Review	1,096	521	48%
Non-Industrial Pollutant Source Demonstration	1,162	780	67%
Source Evaluation	2,006	1,354	67%
MIP Review	19,875	15,020	76%
Advanced BMPs	2,130	1,812	85%
Minimum BMP Evaluation	812	694	85%
New Dischargers	2,276	1,946	86%
Reporting in SMARTS	4,199	3,710	88%
Level 2 ERA Technical Report	581	521	90%
ERA Level 1/NAL Exceedances	3,415	3,111	91%
Additional BMPs	1,552	1,432	92%
Entering Level 2 ERAs	581	565	97%

QISP Sub-Duty

Concept	Total Attempts	Correct Attempts	Percent Correct
Site Description Adequate	581	142	24%
Review QA/QC Data	6100	4053	66%
Industrial Processes Description and Identification	2006	1354	67%
Review Chains-of-Custody	1162	795	68%
3.0 Summary of NAL Exceedances	581	424	73%
SWPPP Complete	515	379	74%
Review Sampling Methods	4553	3546	78%
Sampling and Analysis Justifications	6598	5291	80%
Treatment Control BMPs	1102	896	81%
Review Implementation of Minimum BMP Housekeeping	540	450	83%
9.0 MIP Review	2324	2017	87%
Other BMPs	390	340	87%
Exceedance Descriptions	1687	1514	90%
Storm Water Containment BMPs	1609	1447	90%
Review Existing Analytical Data	1462	1335	91%
Annual Exceedances	1427	1318	92%
Instantaneous Exceedances	301	279	93%
Exposure Minimization BMPs	581	561	97%
4.0 SWPPP Review	581	574	99%
1.0 Site Information	132	132	100%

Question Type

Question Type	Total Attempts	Correct Attempts	Percent Correct
Multiple choice	19,270	15,002	78%
True/False	21,400	17,250	81%

Concepts – Lowest Scores

Concept	Total Attempts	Correct Attempts	Percent Correct
Site with multiple drainage areas that have different pollutants of concern	253	8	3%
SWPPP does not correctly identify Facilities SIC codes based on described industrial activity	581	142	24%
Receiving water impairments	270	82	30%
Inspection forms that indicate problems with BMPs that may have contributed to exceedances with no associated corrective action	287	120	42%
Site that does not meet NALs with economically feasible treatment BMPs	581	291	50%
Sample technique contributing to exceedance (e.g. elevated TSS due to sampling techniques)	533	270	51%
Chain of custody not completed correctly	581	303	52%
SWPPP that does not correctly identify pollutant sources / industrial activity	581	334	57%
Site with additional industrial regulated activities not captured under primary SIC code	272	164	60%

Concept Questions – Highest Scores

Concept	Total Attempts	Correct Attempts	Percent Correct
Automated samples (for oil and grease)	265	239	90%
Site analyzing additional parameter(s) that are not required and have exceeded benchmarks	547	501	92%
Site implementing alternative minimum BMP(s)	581	538	93%
Incorrect analytical method used	581	539	93%
Site with justification for not implementing all minimum BMPs	581	554	95%
Site / drainage area within Site that qualifies for no exposure with addition of advanced BMPs	581	561	97%
ERA Level 2 due to Industrial Activity	581	565	97%
Facility does discharge pollutant(s) of concern	281	277	99%
Facility specific based on evaluation of industrial activity/ pollutants of concern	289	285	99%
No exposure of industrial activity	581	573	99%

SANTA ANA REGIONAL BOARD PERSPECTIVE LEVEL 1 ERA REPORTS AND LEVEL 2 ERA ACTION PLANS

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REGION 8 LEVEL 1 AND 2 COUNTS*

- Level 1: 430 facilities (29% active facilities)

- 37% Metals (Al, Cu, Fe, Zn)
- 24% TSS
- 24% pH

- Level 2: 175 facilities (12% active facilities)

- 60% Metals (Al, Cu, Fe, Zn)
- 18% TSS
- 9% pH

- Level 2 Demonstrations

- 82% Industrial
- 14% Multiple
- 3% Non-industrial

* September 2018



REGION 8 REVIEW OF LEVEL REPORTS

- Incomplete/insufficient information in Level 1 and 2 reports
- Incorrect interpretation of the BMP Implementation Date
- Claims of BMP implementation prior to SWPPP revision
- Questionable QISPs who propose inappropriate (ineffective) BMPs
- If proposing advanced treatment BMPs, neither the Level report nor the SWPPP identifies the maintenance schedule for said BMPs
- Claims of run-on from neighboring properties for exceedances when no run-on issues were ever identified in the SWPPP



REGION 8 LEVEL 1 AND 2 ENFORCEMENT ACTIONS

- Notice of Violations issued to dischargers who failed to submit Level 1 ERA Report and/or Level 2 Action Plans
- R8 staff inspecting each discharger in Level 1 and/or Level 2 to confirm information in submitted reports
- Prioritizing those who discharge to 303(d) listed waterbody or waterbody with a TMDL



REGION 8 – COMMON ISSUES

- Lack of QISP knowledge transfer to discharger/client
- Sample collection and analysis (field vs lab)
- Level status sampling and analysis requirements (Level 1 or 2 – field measurement with probe/meter vs pH paper vs lab)
- BMP Implementation Date



REGION 8 – GENERAL COMMENTS

- Ad Hocs not submitted within 30 days of receipt of lab reports
- Claims of expired pH paper
- Those in Level 1 for a parameter tend to not have any QSEs the following reporting period.





LOS ANGELES REGION'S PERSPECTIVE ON LEVEL 1 REPORTS & LEVEL 2 ACTION PLANS

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Level 1 Reports

- **Permit Year 16/17 Reports** – Due January 1, 2018
- **Variety in the quality of the reports submitted**
- **Most often used BMPs:**
 - Increased frequency of housekeeping;
 - Increased frequency of training.
- **Most often used formats:**
 - Checklists, narratives, hybrids of both



Parameters in Level 1 for 2017-2018

Typical issues with Level 1 Reports:

- Not uploading the updated SWPPP to SMARTS;
- Not all drainage locations evaluated;
- Not including evaluation of prior BMPs;
- Not mentioning how new BMPs were determined and how the sources of pollutants were identified;
- Reports from compliance groups were generic and not specific for each facility;
- Lack of detail in describing BMPs.

Level 1 Parameters for FY 2017-2018	
Aluminum	67
Ammonia	1
Biochemical Oxygen Demand (BOD)	3
Cadmium	3
Chemical Oxygen Demand (COD)	26
Copper	67
Iron	94
Lead	8
Magnesium	6
Nickel	1
Nitrite Plus Nitrate (as N)	41
Oil and Grease	31
pH	57
Selenium	2
Total Suspended Solids (TSS)	104
Zinc	105



Level 2 Action Plans

- **Permit Year 16/17 Reports – Due January 1, 2018**
- **Variety in the quality of the reports submitted**
- **Most often used Demonstrations:**
 - Non Industrial – 19%;
 - Natural Background – 6%
 - BMP Demonstration – 86%
 - Multiple Demonstrations – 12%
- **Most often used formats:**
 - Checklists, narratives, hybrids of both



Parameters in Level 2
for 2017-2018

Typical Issues with Level 2 Action Plans:

- No revised SWPPPs (30 identified issues);
- Schedule for proposed tasks not included (26 identified issues);
- Drainage areas not addressed (19 identified issues);
- Not identifying demonstrations (13 identified issues).

Zinc, Total (Recoverable)	132
Iron, Total (Recoverable)	97
Total Suspended Solids (TSS)	59
Aluminum, Total (Recoverable)	55
Copper, Total (Recoverable)	49
Nitrite Plus Nitrate (as N)	33
Chemical Oxygen Demand (COD)	29
Oil and Grease	14
Magnesium, Total (Recoverable)	11
pH	3
Lead, Total (Recoverable)	3
Selenium, Total (Recoverable)	1
Cadmium, Total (Recoverable)	1



Regional Board Follow-up:

Level 1:

- Notices of violations to dischargers notifying them of the inadequate reports and of missing SWPPPs in SMARTS;
- Telephone discussions with QISPs about the deficiencies;
- Proposed Modifications to CASQA's Level 1 Report Checklist.

Level 2:

- Notices of violations to dischargers notifying them of the inadequate reports and of missing SWPPPs in SMARTS;
- Telephone discussions with QISPs about the deficiencies;
- Facility inspections to see demonstrations.



Overall Observations

- More specificity in the reports
- Update the SWPPPs in SMARTS
- Facility personnel need to be aware and implement the BMPs
- Better communication between report writer and the facility personnel on implementation of BMPs
- New BMPs need to prevent future NAL exceedances
- Evaluate all drainage areas



HUC 10 Watershed Assessment

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HUC 10 Watershed Assessment

- Guidance document to assess monitoring req's if located in a HUC 10 watershed that is impaired (303(d) list)
 - Disclaimer
 - HUC 10 definition
 - Discussion of Question 7 in Annual Report
- Evaluating Impairments
 - Decision tree
 - Dissolved oxygen
 - Temperature
- Guidance Document Handout