OVERVIEW OF THE

California SWRCB's Newly Adopted NPDES **Industrial Stormwater General Permit**

The SWRCB adopted the latest version of the NPDES General Permit for Stormwater Discharges Associated with Industrial Activities on 1 April 2014. The 2014 IGP will become effective on 1 July 2015. This fact sheet summarizes the revised monitoring and compliance requirements in the 2014 IGP and is not all inclusive of the changes compared to the 1997 IGP.

Who is Covered?

With a few exceptions, the same facilities covered under the 1997 IGP are also covered under the 2014 IGP. Coverage is determined by the facility's SIC Code.

Definition of Terms

The following terms are used in this fact sheet.

BMPs: Best Management Practices

CBPELSG: CA Board for Professional Engineers, Land Surveyors and Geologists

ERA: Exceedance Response Action

2014 IGP: Industrial General Permit adopted on 1 April 2014

NAL: Numeric Action Level

NEC: No Exposure Certification

NOI: Notice of Intent

NONA: Notice of Non-Applicability

PRDs: Permit Registration Documents

QISP: Qualified Industrial Stormwater Practitioner

QSE: Qualifying Storm Event

SIC: Standard Industrial Classification

SMARTS: Stormwater Multiple Application and Report Tracking System

SWPPP: Stormwater Pollution Prevention Plan

SWRCB: State Water Resources Control Board

TSS: Total Suspended Solids

Kennedy/Jenks Consultants

Electronic Filing

The 2014 IGP requires specific documents, reports, and laboratory analytical results to be uploaded into the SMARTS. This information will be accessible to the public.

Permit Registration Documents

To obtain permit coverage, a NOI must be submitted with the following documents, referred to as PRDs:

- NOI (with signed certification statement)
- Site Map
- SWPPP and SWPPP Checklist (guidance provided in Appendix 1 of the 2014 IGP)
- Annual Fee

All of these documents must be submitted online via SMARTS. Existing dischargers who were covered under the 1997 IGP have until 1 July 2015 to resubmit their NOI and the PRDs for permit coverage.

Visual Monitoring

The 2014 IGP requires monthly visual observations of BMPs and drainage areas to check the functionality of the BMPs and to identify any unauthorized non-stormwater discharges. Visual observations of stormwater discharges are required during each sampling event. Frequency of sampling events is described below. All visual observations must be recorded and included in the Annual Report to be completed and submitted via SMARTS.

Qualifying Storm Event

A QSE is a rainfall event that 1) produces a discharge in at least one drainage area, AND; 2) was preceded by 48 hours or more of dry weather.

Sampling and Analysis

Stormwater samples are to be collected at all locations that discharge stormwater during two QSEs within the first half of each reporting year (July 1 to December 31) and two QSEs within the second half of each reporting year (January 1 to June 30).

Samples shall be collected from each drainage location within the first four (4) hours of: 1) the start of discharge, OR 2) the start of facility operations when the QSE occurs within the previous 12 hours. All samples must be analyzed for TSS, pH, and oil & grease. Additional parameters may be required for analysis based on the SIC code of the facility. The discharger must submit all sampling and analysis results via SMARTS within 30 days of obtaining all results for each sampling event.

Some dischargers may be eligible to qualify for Representative Sampling Reduction to reduce the number of locations sampled in each drainage area. This may be an option if the sampling locations within a drainage area are substantially similar to one another. To qualify for this exception, the discharger must provide a Representative Sampling Reduction justification as part of the SWPPP.

Numeric Action Levels and Exceedance Response Actions

The 2014 IGP includes two types of NALs. For compliance purposes, the reporting year is defined as July 1 through
June 30.

- Annual NALs apply when the analytical results from all samples taken during a reporting year are averaged for each parameter and the averaged value exceeds a NAL listed on Table 1 for that parameter.
- Instantaneous NALs apply when two or more analytical results for TSS, pH or oil & grease from samples taken within a reporting year exceed the instantaneous maximum NAL listed on Table 1 for that parameter.

Table 1

Parameter	Units	Annual NAL	Instantaneous NAL
pH	pH Units	N/A	6.0 – 9.0
Total Suspended Solids	mg/l	100	400
Oil & Grease	mg/l	15	25
Zinc	mg/l	0.26	-
Copper	mg/l	0.0332	-
Cyanide	mg/l	0.022	-
Lead	mg/l	0.262	-
Chemical Oxygen Demand	mg/l	120	-
Aluminum	mg/l	0.75	-
Iron	mg/l	1.0	-
Nitrate + Nitrite Nitrogen	mg/l as N	0.68	-
Phosphorus	mg/l as P	2.0	-
Ammonia	mg/l	2.14	-
Magnesium	mg/l	0.064	-
Arsenic	mg/l	0.15	-
Cadmium	mg/l	0.0053	-
Nickel	mg/l	1.02	-
Mercury	mg/l	0.0014	-
Selenium	mg/l	0.005	-
Silver	mg/l	0.0183	-
Biochemical Oxygen Demand	mg/l	30	

If an instantaneous maximum NAL or an annual NAL is exceeded, the discharger is moved from Baseline Compliance Status to Level 1 Compliance Status for the next compliance year beginning July 1. The discharger must designate a QISP and is required to evaluate their SWPPP and implement BMP changes by August 30. A Level 1 ERA Report must be prepared by the QISP and submitted by January 1. Compliance Groups are allowed to develop consolidated Level 1 ERA Reports that represent the entire compliance group. If the same parameter is exceeded in a subsequent year, the discharger is moved to Level 2 Compliance Status and must submit an ERA Technical Report. This type of report must be prepared and stamped by a registered Professional Engineer.

Minimum Best Management Practices

The 2014 IGP requires a set of minimum BMPs to be implemented in addition to site-specific BMPs unless they are clearly inapplicable to the facility. Minimum BMPs are required in the following categories:

- Good Housekeeping
- Preventative Maintenance
- Spill and Leak Prevention Response
- Material Handling and Waste Management
- Erosion and Sediment Controls
- Employee Training Programs
- Quality Assurance and Record Keeping

The 2014 IGP also requires a set of Advanced BMPs which are generally structural BMPs and must be implemented if the minimum BMPs are deemed inadequate based on exceedance response actions. Advanced BMPs include:

- Exposure Minimization
- Stormwater Containment and Discharge Reduction
- Treatment Control

Qualified Industrial Stormwater Practitioner

If a facility is at Baseline Compliance Status, a QISP is not required. If a facility has reached Level 1 Compliance Status in the ERA process, the discharger is required to designate a QISP who must complete a SWRCB-sponsored QISP training course, register with SMARTS, and obtain a QISP identification number. Professionals certified with the CBPELSG can participate in a self-guided registration and online training program. A QISP can represent either one facility or multiple facilities but must be able to perform the functions required by the permit at all times. Specific tasks that require a QISP include: Level 1 ERA Evaluation and Report, Level 2 ERA Action Plan and Technical Report, and a Level 2 ERA Extension.

Compliance Groups

Compliance Groups will continue to be allowed in the 2014 IGP for dischargers that have similar pollutant sources and industrial activity characteristics. Compliance groups must have a Compliance Group Leader who 1) assists group participants with compliance activities and 2) is required to complete a SWRCB-sponsored training program. Compliance Groups have reduced sampling conditions, as described below.

Compliance Group Participants are required to collect and analyze stormwater samples from one QSE within the first half of the reporting year and one QSE within the second half of the reporting year.

No Exposure Certification

To qualify for NEC coverage, facilities must:

- Provide a storm-resistant shelter to protect all industrial activities, equipment and materials from exposure to the elements.
- Inspect the facility annually to confirm that stormwater at the site is not exposed to industrial activities, materials or equipment.
- Verify that all unauthorized non-stormwater discharges have been eliminated and all authorized non-stormwater discharges are in compliance with the 2014 IGP.

The following PRDs must be submitted to register for NEC coverage by 1 October 2015 via SMARTS: Site Map, NEC Checklist, NEC Certification, and Annual Fee. This certification is required to be evaluated and recertified annually.

Notice of Non-Applicability

Some facilities may be eligible to claim "No Discharge" through a NONA for exemption under the 2014 IGP. Entities must meet the following eligibility requirements to qualify for a NONA:

- The facility must be engineered and constructed to contain the maximum historic precipitation event (or series of events) so that there will be no discharge of industrial stormwater to waters of the United States, OR
- The facility is located in basins or other physical locations that are not hydrologically connected to waters of the United States.

Eligible facilities must submit and certify the NONA and a No Discharge Technical Report via SMARTS. The No Discharge report must demonstrate that the facility meets the eligibility requirements and must be signed by a CA licensed Professional Engineer.

Important Dates

- 1 July 2015 – the 2014 IGP becomes effective and the reporting year begins
- 1 July 2015 – dischargers who were covered under the 1997 IGP need to resubmit their NOI and the PRDs
- 1 July 2015 – new enrollees need to submit their NOI and the PRDs.
- 1 October 2015 – submit PRDs to register for NEC coverage

It is also recommended that staff become trained on the 2014 IGP prior to 1 July 2015.

Additional Information

If you need additional information, please contact Katie McCoy at (916) 858-2767 or Margaret Wild at (415) 243-2527. The 2014 IGP is available on-line at: http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/wqo14.shtml

(scroll down to the 1 April 2014 listed document section).