

# Industrial General Permit Overview

**State Water Resources Control  
Board  
Division of Water Quality  
Industrial/Construction Storm  
Water Unit**

## Industrial Permit Timeline

- 1991 – State Water Board adopts Industrial General Permit (92-12)
- 1997 - State Water Board adopts Industrial General Permit (97-03-DWQ – “current permit”)
- 2003-2005 – Prior draft IGPs, Blue Ribbon Panel of Experts address the feasibility of Numeric Effluent Limits, development of SMARTS electronic information system.
- 2011-2013 – State Water Board hearings on previous drafts of the permits
- April 1, 2014 – State Water Board adopted the Industrial General Permit
- Effective Date July 1, 2015

# ELECTRONIC REPORTING AND THE PERMIT

## STORM WATER MULTIPLE APPLICATION AND REPORT TRACKING SYSTEM (SMARTS)



## Electronic Filing Requirements

- Effective date July 1, 2015 NOI Coverage
- October 1 2015 NEC Coverage
- Streamlined Annual Report
- Sampling and Analysis
- Technical Reports
- Terminations
- Changes of Information

# Storm Water Pollution Prevention Plan (SWPPP) Requirements

## Minimum Best Management Practices (BMPs) Section X.H



- Implementation of the minimum BMPs (mostly non-structural) to the extent feasible required
- Represents common practices at industrial facilities
- Basis for compliance with technology-based effluent limitations and water quality based receiving water limitations.

## **Advanced BMPs**

### **Section X.H.2**

- Mostly structural and exceed the performance expectation of minimum BMPs
- Required to meet design storm standards
- Consists of: treatment control BMPs, exposure reduction BMPs, and storm water containment and discharge reduction BMPs
- Utilize advanced BMPs that infiltrate or reuse storm water (where feasible)

## **Design Storm Standards for Treatment Control BMPs**

### **Section X.H.6**

- 85<sup>th</sup> percentile 24-hour storm standard for volume based criteria
- 85<sup>th</sup> percentile 1-hour rainfall intensity for flow based criteria.
- LA SUSMP requirement and CASQA BMP Manual
- Requires local historical rainfall records
- Dischargers are not required to retrofit existing treatment control BMPs until possibly in Level 2

## **Other SWPPP Changes**

- Temporary Suspension of Industrial Activities:
  - Over 10 days
  - Stabilized
  
- Monitoring Implementation Plan

## **Monitoring Requirements**

## **Changes to Monitoring**

- Monthly observations of NSWDS
- Sampling Events (including bypass and contained storm water)
- New Definition: Qualifying Storm Event: 48 hours no discharge & one discharge location discharges

## **Sampling Protocols Section XI.B**

- Two QSEs from July 1 to December 31st and two QSEs from January 1 to June 30 of the Reporting Year
- During scheduled facility operating hours
- From each drainage location within four hours or the start of scheduled facility operating hours if the QSE occurred in the previous twelve (12) hours.

## Other Monitoring Requirements

- pH screening - (if no pH ELG)
- Alternative Discharge Locations
- Representative Sampling Reduction
- Qualified Combined Samples
- Sample Frequency Reduction



## Section XII Exceedance Response Actions (ERA) Process

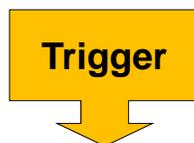
## Baseline Status

- Numeric Action Levels
- Minimum BMPs/possibly Advanced BMPs
- Inspection, Implementation, Maintenance
- Visual Monitoring
- Sample 4 qualified storm events per reporting year

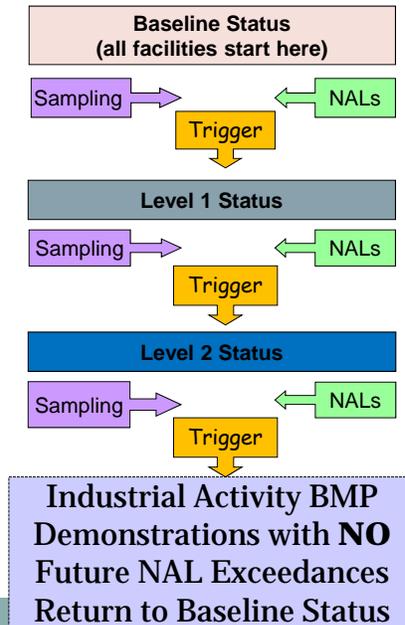


## Numeric Action Levels (NALs)

- Annual NAL exceedance  
The **average** of all the analytical results for a parameter from samples taken within a reporting year exceeds an annual NAL value for that parameter
- Instantaneous maximum NAL exceedance  
**Two or more** analytical results for TSS, O&G, or pH from samples taken within a reporting year exceed the instantaneous maximum NAL value (or is outside the NAL pH range).



## EXCEEDANCE RESPONSE ACTIONS (ERAs)



## Level 1 ERA Timeline

- Status changes - July 1
- Evaluation by October 1 Prior to implementation of BMPs or October 1, sampling not included in calculations for Level 2
- Level 1 Report (QISP, Evaluation, Summary Site/BMP changes in SWPPP) by January 1

## Level 2 ERA Timeline

- Status changes next July 1
- Action Plan: QISP, facility plan for addressing exceedances, and a schedule - January 1
- Technical Report : QISP, Evaluation, Treatment/Structural BMPs implemented - January 1 of the next reporting year
- Implementation Extension: Regional Board approval required if over 6 months requested and submitted electronically

## ERA Level 2 Demonstrations

The Level 2 ERA Technical Report can have one or more of the following:

- Industrial Activity BMP Demonstration  
(opportunity to return to baseline if exceedances eliminated)
- Non-Industrial Pollutant Source Demonstration
- Natural Background Demonstration

## Training Qualifications Section IX

- Dischargers shall appoint QISP – internal or external
- No prerequisites
- Training is not “intro to storm water”
- Only Dischargers with Level 1 and Level 2 status
- ERA reporting and Action Plan, New Dischargers with 303(d) impaired receiving waters



## Training Qualifications Section IX

- California licensed professional civil, industrial, chemical, and mechanical engineers and geologists
- Parallel and streamlined training process to be a QISP
- Inactive Mining Storm Water Pollution Prevention Plans (SWPPPs), NONA Technical Reports, and Subchapter N calculations

## **Training Timeline**

- Industrial General Permit Training Team Feedback Forum February 27, 2014
- Trainers of Record July 2015
- QISP Enrollment by winter 2015

## **Compliance Groups**

### **Section XIV**

- Substantially similar industrial activities
- 50% sampling reduction
- Compliance Group Leaders - approved through the State Water Board approved training program "TOR"
- Inspect annually
- Prepare Level 1 and Level 2 ERA reports
- Executive Director may review the Groups

### **Section XIII Inactive Mining Operation Certification**

- SWPPP signed by a California licensed professional engineer
- Certification relieves facility from monitoring, ERAs and Annual Reporting requirements
- Submitted electronically, annual inspect and recertify
- Significant changes to the facility require a California licensed professional engineer to sign off on the changes.



### **Conditional Exclusion – No Exposure Certification (NEC) Section XVII**

- Checklist - 11 categories of no exposure for industrial materials/activities
- No SWPPP or monitoring required
- Annual fee (low), inspection and recertification
- Regional Boards can deny if invalid



## **NONA – No Discharge Section XX.C**

- Facility constructed to have no Discharge
- Facility located in a basin or other physical location that is not hydrologically connected to waters of the United States
- Requires a Professional Engineer

## **Total Maximum Daily Loads (TMDLs) Section VII.A**

- Development of implementation language (Regional and State)
- Reopener – State Water Board to include by July 1, 2016
- Dischargers required to comply with these requirements

## **303(d) Impaired Water Bodies**

### **Section VII.B**

- New Dischargers ineligible for coverage unless parameter is:
  - Not exposed
  - Not present
  - Discharged but below a WQS
- Qualified Industrial Storm Water Practitioner
- Existing Dischargers – potential additional monitoring

## **Discharges to Ocean Waters**

### **Section VIII.A**

- Dischargers with outfalls discharging to the ocean
- July 1, 2015 – develop monitoring plans, regional board assistance
- Dischargers required to comply with these requirements



## **Discharges to Areas of Special Biological Significance (ASBS) Section VIII.B**

- Dischargers granted an exception required to meet conditions in Attachment G
- Ineligible for coverage unless meet criteria



## **Plastic Materials Section XVIII**

- AB 258 required control of preproduction plastics
- Ineligible for coverage unless criteria met virgin and recycled “preproduction” materials
- Requires containment (1 mm mesh meet peak flow rate from 1-yr 1-hour storm)
- If containment infeasible, alternative containment BMPs can be proposed
- Exemption from containment criteria (NEC, 8 BMPs)

## Next Steps

- Adoption is just the beginning!
- Trainings – Water Board presentations on permit and SMARTS – Early 2015
- Re-enrolling Dischargers and PRDs
- Developing guidance (IGPTT, CASQA)
- Developing QISP Certification

## Thank you



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