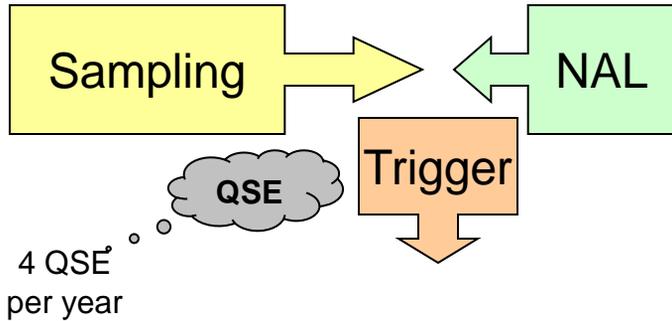


EXCEEDANCE RESPONSE ACTIONS (ERAs)

Required in Section XII of the Industrial General Permit

Baseline
(all facilities start here)

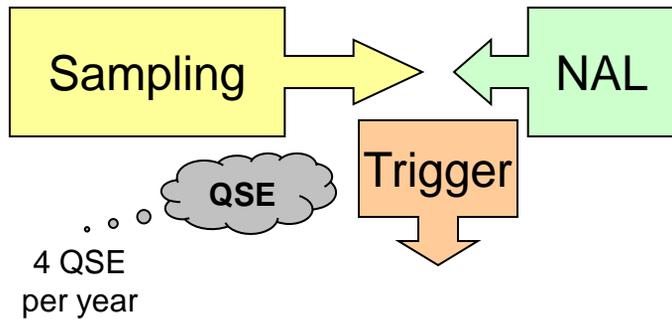
NALs take effect on the effective date of permit.



There are two types of NALs - annual and instantaneous

Level 1
Operational Source Control

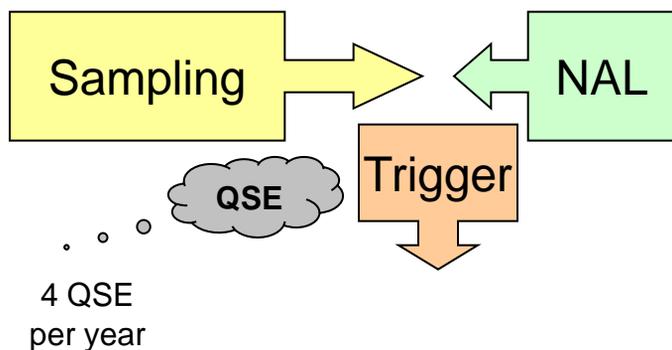
Discharger must review SWPPP and implement additional BMPs and submit Level 1 ERA Report



Level 2
Source / Treatment Control

Submit a Level 2 ERA Action Plan and Technical Report. Can include the following Demonstrations:

- (1) Industrial Activity BMPs - no more BMPs;
- (2) Exceedances are from non-Industrial Pollutant Sources;
- (3) Exceedances are from Natural Background Pollutant Sources



There are two types of Numeric Action Levels (NALs):

1. Annual NAL_A exceedance - occurs when 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 (or is outside the NAL pH range)
2. Instantaneous maximum NAL_I - occurs when 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).

Acronyms:

- BMP – Best Management Practice
- ERA – Exceedance Response Actions
- QSE – Qualifying Storm Event
- NAL_A – Numeric Action Level – Annual
- NAL_I - Numeric Action Level - Instantaneous
- SWPPP – Storm Water Pollution Prevention Plan