STATEWIDE INDUSTRIAL GENERAL PERMIT

DISCHARGER’S GUIDE TO THE STORM WATER MULTIPLE APPLICATION AND REPORT TRACKING SYSTEM (SMARTS) DATABASE

LEVEL 2 EXCEEDANCE RESPONSE ACTION (ERA)

ACTION PLAN SUBMITTAL

Last Revised: December 13, 2017
Statewide Industrial General Permit - Level 2 Exceedance Response Action (ERA) Action Plan:

All Dischargers have Baseline status for all parameters at the beginning of a Discharger’s Notice of Intent (NOI) coverage in the Statewide Industrial General Storm Water Permit (IGP). A Discharger moves through the Exceedance Response Action (ERAs) Levels if monitoring results from prior reporting year (also referred to as reporting period). The IGP reporting year is July 1st through June 30th.

SMARTS assigns1 a regulatory “Level” status annually on July 1st (the end of each reporting year) to each industrial facility based on the required monitoring data submitted into SMARTS. A Level status will be assigned to the facility if sampling results from the previous reporting year indicates that the discharge from an industrial facility exceeds an Annual or Instantaneous Maximum Numeric Action Level (NAL) for an applicable parameter2.

Dischargers with a facility moving from Level 1 status to Level 2 status for an NAL exceedance are required to complete ERAs. Level 2 status ERAs require the Discharger to:

(1) Obtain the assistance of a Qualified Industrial Storm Water Practitioner (QISP)3 to complete the Level 2 ERA process,

(2) Submit a Level 2 ERA Action Plan by January 1 of the following year Level 2 status is determined, and

(3) Submit a Level 2 ERA Technical Report by January 1 following the submission of the Level 2 ERA Action Plan.

To be qualified to assist a Discharger with the ERA process, and to prepare an ERA Action Plans and ERA Reports, a QISP must:

(1) Have a valid QISP certificate number through the sponsored and approved QISP Training Program provided by the California Stormwater Quality Association (CASQA) and administered by the Office of Water Programs at Sacramento State (OWP), or

(2) Be a licensed engineer by the California Department of Consumer Affairs, Board for Professional Engineers, Land Surveyors, and Geologists, and have completed the QISP self-certificate review administered by OWP.

---

1 NOTE: Please keep in mind emails from SMARTS are not a formal notice and dischargers should track any ERA exceedances separately from SMARTS. The NAL calculation in SMARTS is provided for convenience to assist the facility and Water Board staff, but it is ultimately the responsibility of the Discharger to demonstrate permit compliance.

2 NOTE: A Discharger is not in violation of the IGP when its discharge exceeds an NAL; a Discharger however is in violation of the IGP if it fails to complete and submit the required ERAs and affiliated documents.

3 NOTE: Further information regarding the QISP training program is located on the State Water Board webpage at https://www.waterboards.ca.gov/water_issues/programs/stormwater/qisp.shtml
The Level 2 ERA Action Plan must be submitted and certified by the facility’s Legal Responsible Party (LRP) or the Duly Authorized Representative (DAR). The following steps guide an LRP or DAR to submit the Level 2 ERA Action Plan prepared by a QISP:

1. Please log into SMARTS: https://smarts.waterboards.ca.gov
   Please use SMARTS in Microsoft Edge

   ![SMARTS Login Page](image1)

2. From the Main menu select “Reports”:
3. Search for an ERA Report using the Reporting Period that corresponds with the Level 2 ERA Action Plan. Any facility that the user is linked to will display once you select “Search”:

Only the “Reporting Period” is required to be selected when searching. If the search does not return any results, try entering fewer search fields. If only the Reporting Period is selected and no results display, the user is not linked to the Waste Discharge Identification (WDID) number. Please contact the Legally Responsible Person (LRP) associated with the organization to be linked to the WDID number.

4. Select the facility you wish to view by clicking on the “Facility Name” hyperlink:
5. The Level 1 and Level 2 reports associated with the facility will display if the facility had NAL exceedances during the prior reporting year. By selecting the “Report ID” you can view/start the Level 2 ERA Action Plan and view the related exceedances:

![Level 2 ERA Action Plan Submittal Guidance](image)

6. An annual average table will be displayed in the “General Info” Tab for review only. This table lists the parameters that have Level 2 status in the far right column. The Level 2 Action Plan being submitted must include the Exceedance Response Actions that will address these listed parameters.
7. The Level 2 ERA Action Plan prepared by a QISP must be uploaded by entering the “Attachments” Tab of this report menu in SMARTS, and selecting the “Upload Attachment” button:

The following is an example of a completed “SMARTS File Upload” pop-up window:

---

**NOTE:** For the Level 2 ERA Action Plan please use the file type “Level 2 ERA Action Plan”. For Storm Water Pollution Prevention Plan (SWPPP) revisions please use the file type “SWPPP”. For all other documents, use the file type “Supporting Documentation”.

---
The user may select the “Attachments” Tab to refresh the screen and verify that the attachment properly uploaded. Once the upload verification is completed, select “Next”.

8. Information for the QISP that prepared the Level 2 ERA Action Plan must be entered in the “QISP” Tab. The “QISP” Tab requires the use of the QISP lookup tool. Select the “Lookup QISP” button to open the search menu:

A user can search using the criteria in the look-up tool and select the QISP on the right. It is best to search using only one criteria. (e.g. Last name only)

5 NOTE: If an incorrect attachment is uploaded, an attachment can be deleted by selecting “Delete” on the right.
9. Once the QISP has been identified through the search function, select the “Next” button:

![QISP identification page]

10. The “Certify” Tab provides a completion check of the Level 2 ERA Action Plan in progress:

![Certification check page]

The “Perform Completion Check” function will provide the user with a notification of any errors that must be corrected prior to submission of the Level 2 ERA Action Plan (e.g. correct attachments uploaded). Any user can perform this check. If a Data Entry Person (DEP) performs the check and the Level 2 ERA Action Plan is complete, SMARTS will only allow the DEP to notify the LRP or DAR (via a SMARTS generated email) that the Level 2 ERA Action Plan must be certified and submitted. A DEP completing this check will see this:
Once the DEP selects “Submit to LRP/DAR”, the screen will display a message “Email successfully sent to LRP/AS” and the status “Not Submitted – certification required”.

11. The Level 2 ERA Action Plan must be certified and submitted\(^6\) by the LRP or DAR. The LRP or DAR must identify the Level 2 ERA Action Plan in SMARTS (same steps as outlined by steps 1-5 of this guide) and select the Level 2 ERA Action Plan that requires certification:\(^7\)

\(^6\) NOTE: The LRP/DAR must have a valid eAuthorization form on file to be able to certify

\(^7\) NOTE: If the Data Entry Person (DEP) has properly sent the ERA Report for certification to the LRP/DAR then they can also view reports ready for certification in the “Documents Ready for Certification” SMARTS menu option.
12. The LRP or DAR certifies and submits the Level 2 ERA Action Plan by selecting the check box, entering their password, answering a security question, and selecting the “Submit/Certify” button:

13. A confirmation screen will then confirm submission of the Level 2 ERA Action Plan Report in SMARTS: