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

- 85th percentile 24-hour storm standard for volume based criteria
- 85th 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)

- **Baseline Status** (all facilities start here)
  - Sampling → Trigger → NALs

- **Level 1 Status**
  - Sampling → Trigger → NALs

- **Level 2 Status**
  - Sampling → Trigger → NALs

- **Industrial Activity BMP Demonstrations with NO Future NAL Exceedances Return to Baseline Status**

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**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 Polluant 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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