TOPICS

• When is a QISP needed?
• QISP Prerequisites/Qualifications
• Training Program Development
• Timeline
• Planning Ahead
• Question and Answers
WHEN IS A QISP NEEDED?

- Dischargers shall appoint QISP – internal or external for:
  - Level 1 status reporting
  - Level 2 status reporting and Action Plan
  - New Dischargers with 303(d) impaired receiving waters

QISP TRAINING PREREQUISITES

- No established prerequisites
- Training is not intended to cover entire IGP
- Trainees should have a good understanding of the IGP and Clean Water Act (CWA)
- Goal of trainee should be to learn more on how to implement new IGP requirements
PROFESSIONAL ENGINEERS & GEOLOGISTS

- California licensed professional civil, industrial, chemical, and mechanical engineers and geologists (CPBELSG)
  - Parallel and streamlined training process
  - No testing for becoming a QISP
- Professional Engineers required for:
  - Inactive Mining SWPPPs, NONA Technical Reports, and Subchapter N calculations

INDUSTRIAL GENERAL PERMIT TRAINING TEAM (IGPTT)

- Sept 2012 – May 2013 SWRCB selected IGPTT Members through application process
- 15 IGPTT Members
- 10 – 15 Sub-Committee Seats
- 1-2 year commitment; 10 – 40 hours/month
- Regular meeting attendance
- August 1, 2013 – IGPTT Kickoff
IGPTT MEMBERS

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<tr>
<th>Name</th>
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<tr>
<td>Arthur Deicke</td>
<td>Environmental Pollution Solutions</td>
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<tr>
<td>Brian Currier</td>
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<td>Calvin Noling</td>
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<td>Daniel Apt</td>
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<td>John Teravskis</td>
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<td>Rich Muhl</td>
<td>RWQCB- 5 Sacramento</td>
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<tr>
<td>Tim Simpson</td>
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QISP TRAINING PROGRAM

- QISP Training Program (non-CPBELSG)
  - Estimated 16 hours on-line, with quizzes
  - Online exam
  - 1 day classroom taught by Trainer of Record (TOR)
  - No test at completion of classroom
  - Fee for Training
  - QISP ID Number Issued
  - Recertification will likely be required
QISP TRAINING PROGRAM

• Includes photos, videos, outside resource links, quizzes
• Example “Site Scenarios” for practical application
• Completed at QISP candidate’s own pace, but within 2 years of registering

CLASSROOM TRAINING

• Review of on-line training material
• Provide opportunity for Q&A/discussion
• Demonstrations
• Case Studies
QISP EXAMINATION

- Examination will address content covered during training via:
  - General questions regarding IGP
  - Questions using Site Scenarios to test practical understanding
- Examination will also test broader IGP and CWA knowledge

QISP TRAINING TIMELINE

- February 27, 2014 - Feedback Forum
- March 2015 – Trainer of Record (TOR)/CGLs RFQ
- June 17-18, 2015 – TOR/CGLs Training
- July 2015 - TORs/CGLs available
- Fall 2015 - Training Rollout
- Winter 2015 - QISP Enrollment
PLANNING AHEAD IS KEY!

- Review SWPPP and historical analytical results
  - Evaluate areas for improvement
  - Perform Level 1 ERA
  - Implement improvements now to avoid ERA process
    - Avoid exposure
    - Avoid discharge
    - Implement minimum BMPs
    - Review sampling techniques and modify, if needed
    - Evaluate/Eliminate pollutant sources (run on, aerial deposition)

PLANNING AHEAD

- Get comfortable with electronic reporting
- Identify your team players
- Train facility staff
- Seek help!
  - Resources are available to help, not just penalize!
CONTACTING THE BOARD

http://www.waterboards.ca.gov/water_issues/programs/stormwater/

Get Informed – Lyris List

http://www.waterboards.ca.gov/water_issues/programs/stormwater/

Receive email updates on Storm Water permitting issues. Subscribe online to our electronic mailing lists.

GENERAL INTERESTS
DRINKING WATER
ENFORCEMENT
FINANCIAL ASSISTANCE (GRANTS & LOANS)
LEGAL NOTICES - Office Of Chief Counsel

☐ Storm Water Database Issues
☐ Storm Water Industrial Permitting Issues
☐ Storm Water Municipal Permitting Issues

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Email Address: (required)
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Subscribe
TIMELINE...

- **Now through June 2015** – Assess Applicability/Update Program – Don’t Wait!
  - NOI or NEC coverage
  - NONA criteria?
- **July 1, 2015** - Permit is EFFECTIVE
  - Comply...
TO DO BEFORE JULY 1, 2015

NOI COVERAGE
• Update/Implement SWPPP (not a trivial effort...)
  – Incorporate minimum BMPs (more details!)
  – Include additional facility specific and advanced BMPs
  – Assessment and description of pollutant sources
  – Update site map
  – Prepare Monitoring Implementation Plan

• Register in SMARTS/Upload PRDs

• Train Employees

• Hit the Ground Running on July 1!

PLAN AHEAD

• Review Historic Analytical Results
• Areas for improvement?
• Perform a “Level 1 ERA Evaluation?”
• Improve now, avoid the ERA process
  – Understand ERA Process...
• Type of improvements?
  – Avoid Exposure
  – Avoid Discharge
  – Minimum BMPs
  – Sampling techniques/methodology
  – Type (run-on, aerial deposition, non-industrial areas)
• Incorporate Improvements into SWPPP and IMPLEMENT
PERMIT/ERA TIMELINE

- Revise Documents/Enroll in Program
- Collect Samples – NAL Exceedances
- Permit Adopted
- Enter ERA Level 1
- Collect Samples – NAL Exceedances
- Level 2 ERA Action Plan
- Permit Effective
- Level 1 ERA Evaluation
- Enter ERA Level 2
- Submit Level 2 Demonstration Technical Report

PLANNING AHEAD – IMPORTANT QUESTIONS

- Is there a way out of full Permit coverage?
  - NEC
  - NONA
- Am I going to have problems meeting NALS?
  - What does your data tell you?
  - Additional parameters to consider?
- What are my sources?
  - Under your control or not?
- What are my options and what do they cost? (BMP implementation)
  - Short and long term strategies
- What else should I be concerned about?
  - TMDLs...
  - Drought?
MINIMIZE/AVOID DISCHARGE

• Minimize or Eliminate Discharge
  – Infiltration
  – Sanitary sewer
  – Re-use

• Evaluate Feasibility/ Costs Now

• Notice of Non-Applicability (NONA) Criteria?

NOTICE OF NON-APPLICABILITY (NONA)

• When is this Required?

• Site must meet the following:
  – Engineered and constructed to have contained the maximum historic precipitation event (or series of events) using precipitation data collected from NOAA’s website
  – Basin or other physical location that is not hydrologically connected to water of the US

• Submit NONA and NONA Technical Report
  – Prepared by CA licensed PE
MINIMIZE EXPOSURE

• Can you cover your industrial activities?

• Can you isolate/cover/contain “high risk” areas?

NALS – WHAT DOES YOUR DATA TELL YOU?

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**Parameter**  
**Unit**  
**Annual NAL**  
**Instantaneous NAL**

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YOU ARE NOT ALONE...

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WHAT IS CAUSING THE NAL EXCEEDANCE?

- Industrial Activities
- Non-Industrial Sources
  - Run-on, aerial deposition, on-site non-industrial
- Natural Background Sources
- Not Sure?
  - What type of information/data do I need?
EXAMPLES

- Is Aerial Deposition Contributing Cu and Zn?
  - Must show NAL Exceedance solely attributable (relative concentrations)
  - Quantify via sampling (wet vs. dry deposition)
  - Regional studies
  - Easier said than done….

- Is Run-on from neighboring property contributing TSS?
  - Characterize run-on

- Are Iron and Aluminum elevated from natural soil conditions?
  - Regional soil surveys
  - Site-specific samples

HOW DO I ADDRESS THE SOURCE?

- Understand what are others in your industry doing?
  - Is your industry association active?
  - Monitoring/Compliance Groups might be a good option
  - What is BAT/BCT for your industry?

- Minimum BMPs implemented?

- What advanced BMPs are feasible?
  - Cover
  - Contain
  - Treat
TREATMENT SYSTEMS AT INDUSTRIAL SITES:
WHAT IS KNOWN ABOUT PERFORMANCE?

• Because relatively few industrial dischargers have implemented treatment – not much is currently known about performance

• What works for MS4 code compliance may not be sufficient for industrial dischargers

• Industrial sites are not well represented in the International Stormwater BMP Database

• Treatment Systems are Evolving
  – Some treatment vendors are now incorporating polymers/flocculants with promising results
  – Several systems have been installed, but limited results are available (getting better)
    - Orange County Coastkeeper/RWQCB Region 8 Study

POSSIBLE LID APPROACHES FOR INDUSTRIAL SITES

• Alternatives to reduce volume of discharges
  – Seepage pits
  – Infiltration galleries
  – Bio-swales
  – Directing flow to “back 40” to avoid discharge
  – Infiltration wells

• Possible storm water harvesting/reuse options
  – Cooling water
  – Dust/emissions control
  – Cost/benefit should consider permit compliance, not just cost of reduced water purchase
POSITIVES

- Reduced Impact to Downstream Receiving Water
  - Volume Reduction
  - WLAs

- Recharge of Local Groundwater Aquifer
  - Variety of Ancillary Benefits

- Potential Greenhouse Gas Emission Reductions
  - Reduced Need for Import of Water
  - Reduction in Energy Needs

- Difficult to quantify cost vs. benefit
  - Particularly for re-use/re-charge

- Permit Compliance

CONCERNS WITH LID AT INDUSTRIAL SITES

- In most cases, LID approaches rely on infiltration

- Not all sites are candidates for infiltration
  - Minimum distance from groundwater
  - Proximity to nearest water supply well
  - Geotechnical concerns/soil conditions
  - Existing soil/groundwater impacts

- Some MS4s limit infiltration at industrial sites

- Some level of pretreatment warranted...

- Concerns about long term impacts to soil and groundwater
  - Are you trading one headache for another?
COMPLIANCE STRATEGIES

- Start Planning NOW!!!
  - Historical Data
  - Sampling Strategies (methods/locations)
    - Are results representative?
  - Short and Long Term strategy
  - Demonstration Technical Reports

- Eliminate Exposure/Discharge?
  - Cover/contain operations
  - Infiltration, sewer, re-use

- What are Others in your Industry Doing
  - Affects BATEA/BCT
  - Compliance Groups
  - Don’t be the “Low Hanging” fruit

Questions?

Thank You!