

# Draft General Industrial Stormwater Permit: Challenges and Opportunities

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## Introduction

- A Series of Webinars
  - Overview
  - Stormwater Pollution Prevention Plan (SWPPP) Requirements
  - Monitoring and Reporting Requirements
  - Groups and Planning for the Future

## Introduction to Session Three

- Background
- Requirements
  - Training
  - Visual Monitoring
  - Sampling
  - Reporting





## Background

- Federal Clean Water Act
- Regulation of Stormwater Discharges
- Discharge Standards for Industrial Stormwater
- Compliance Standards for Industrial Stormwater
- Previous Permit
- Newest Draft Permit can be found at [http://www.swrcb.ca.gov/water\\_issues/programs/stormwater/](http://www.swrcb.ca.gov/water_issues/programs/stormwater/)



## Minimum Set of Best Management Practices (BMPs)

- Good Housekeeping
- Preventative Maintenance
- Spill Response Procedures
- Material Handling/Waste Management
- Employee Training
- Record Keeping and Quality Assurance
- Erosion/Sediment Control Practices
- Visual Inspections
- Additional Facility Specific BMPs
- Planning, Training, Inspections, and Monitoring

## Monitoring Requirements

- Daily Inspections
  - Equipment
  - Cleaning
  - Non-discharge storm observations
- Weekly Inspections
  - Outdoor exposed areas
  - Wash-water BMPs
  - Covers over industrial materials
  - Diversions



## Monitoring Requirements

- Monthly Inspections
  - First qualifying event per month
- Quarterly Inspections
  - SWPPP revisions to address physical changes at site
    - Pollutant sources
    - Authorized non-stormwater discharges
    - Unauthorized non-stormwater discharges
- Annual Inspections
  - Annual Comprehensive Site Evaluations
  - Non-Exposure Certification
  - No-Discharge Certification

## Storm Event Observations and Inspections

- Pre-Storm Observations
- During Storm Observations
- Non-Discharge Storm Events
- Post Storm Observations



## Storm Sampling Overview

- Monitoring Implementation Plan (MIP)
- Logistics and Preparation
- Qualifying Storm Events
  - Should probably sample the first event of each quarter
- Operating Hours Requirements
- Antecedant Dry Weather Requirements
- Grab Samples within 4-Hours of Discharge
- Daily Average Samples
- Qualified Combined Samples
- Daily Samples at SIC Group #(10, 14, & 4953)



## Monitoring Implementation Plan

- MIP Purpose
- MIP Requirements
  - Training and availability of personnel
  - Mobilization and weather tracking
  - Pre-storm activity
  - Sampling locations
  - Sample type (grab or composite)
  - Parameters and laboratory methods
  - Sampling handling and preservation
  - Quality Assurance/Quality Control (field and lab) and Contaminants of Concern



## Sampling Parameters

- Basic Parameters
  - Total Suspended Solids (TSS)
  - Oil and Grease (O&G)
  - Specific Conductance (SC)
  - pH
- Facility Specific Parameters (SIC Code Based)
- Pollutants of Concern (Based on site evaluation)
- 303(d)-Listed Parameters and Total Maximum Daily Load (TMDL)-Specific



## Logistics and Preparation

- What is a qualifying storm event?
- Qualifying for Pre-storm Activities
- Qualifying for Sampling Activities
- Weather Tracking
- Pre-storm Inspections and Observations

## Qualifying Storm Events

- 0.25" of Rainfall
- No More Than 1/8<sup>th</sup> of Rainfall 48-Hours Before Discharge
- Discharge Must Occur During the Operating Hours of the Facility
- Rainfall Measured "On-Site"
- Requires Complex Weather Tracking, Coordination, and Preparation



## Stormwater Samples

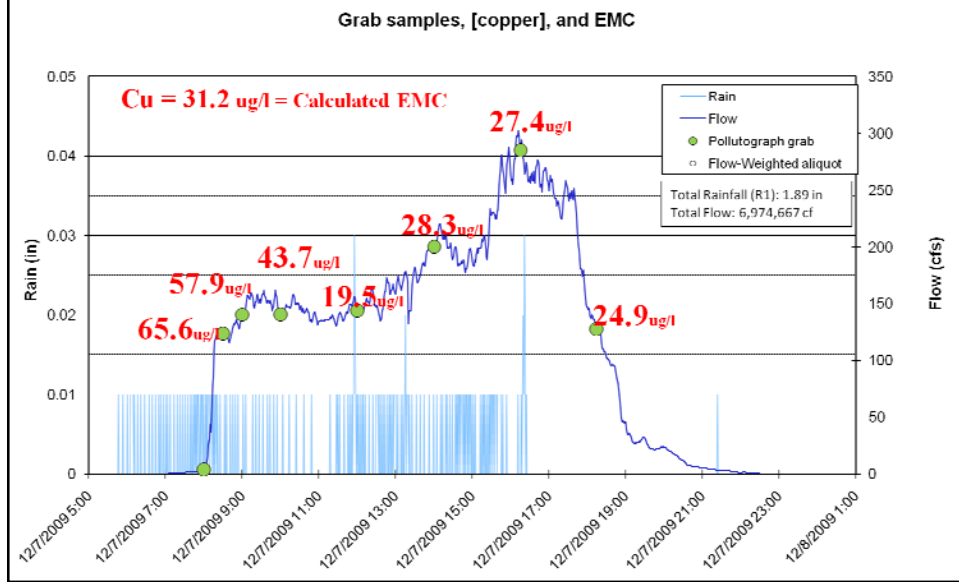
- Where to Sample
- Holding Times for pH and Conductivity
  - 15-minutes for pH
  - 24-hours for conductivity
- Grabs
- Composites
- Daily Average Samples
- Holding Times for Other Pollutants
- Laboratory Methods



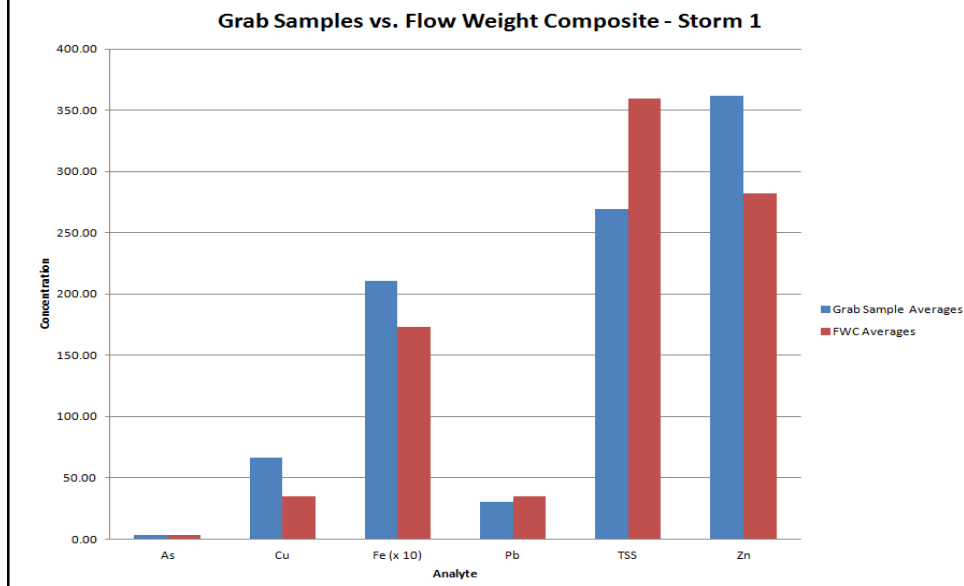
## Daily Average Samples

- Collection of Multiple Samples From a Qualifying Event and Averaging of Results Into a Daily Average (DA) Sample
- DA Samples Can be More or Less Representative
- Provides Discharger with Flexibility for Sampling Design

## Grabs vs Composites

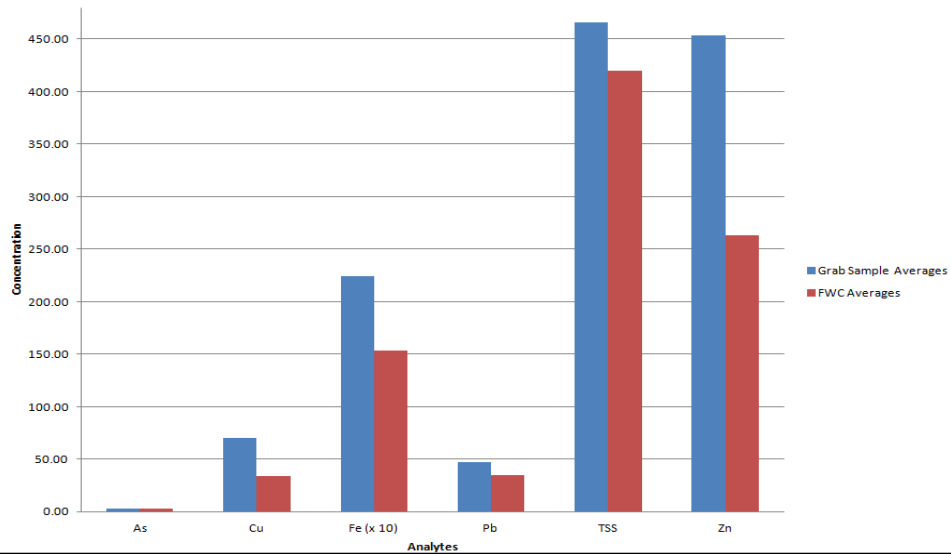


## Grabs vs. Composites (cont.)



## Grabs vs. Composites (cont.)

Grab Samples vs. Flow Weight Composite - Storm 2

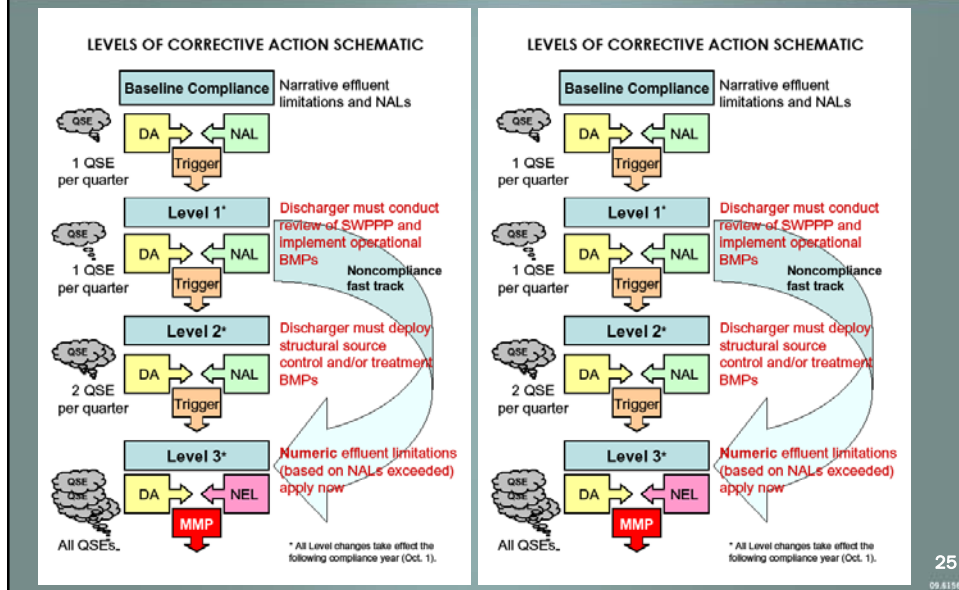


## Sample Handling

- Identify Parameters and Lab Protocols
- Holding Times (pH and SC) and Laboratory Transportation
- Lab to Combine Samples for Composites
- No Overfilling
- Labels
- Packing
- Chain of Custody



## Risk Level Triggers



## Training

### Level 1: Operational Source Control BMPs

- Documentation of specific practices
- Training for proper sweeping, pressure washing, etc.

### ■ Level 2: Structural Treatment Control BMPs

- Training and documentation of maintenance and cleaning

### ■ Level 3: Numeric Effluent Levels (NELs); to be determined

### ■ Training for MIP Implementation

## » Inspections

- Level 1:
  - Source control measures: Monthly, Quarterly, Weekly, Daily, including logs
- Level 2:
  - Structural and treatment control BMPs: Monthly, Quarterly, Weekly, Daily
- Level 3:
  - Best Available Technology (BAT)/Best Conventional Pollutant Control Technology (BCT): Monthly, Quarterly, Weekly, Daily

## » Sampling Frequency

- Risk Level 1
  - 1-qualifying storm per quarter
- Risk Level 2
  - 2-qualifying storms per quarter
- Risk Level 3
  - Every qualifying storm per quarter





## Corrective Actions

- Compliance Schedule
  - Risk Level 1
    - Implementation operation and source control BMPs
  - Risk Level 2
    - Install and implement structural treatment control BMPs
  - Risk Level 3
    - BAT/BCT compliance
  - Consequences for Not Complying



## Record Keeping

- Risk Level 1
  - Operation BMP maintenance activities, inspections, and logs
- Risk Level 2
  - Structural and treatment control BMP maintenance activities, inspections, and logs
- Risk Level 3
  - Additional structural and treatment control BMPs documentation



## Electronic Submittals

- Stormwater Multi Application Reporting and Tracking System (SMARTS)
  - All documents related to general stormwater enrollment and compliance will be submitted electronically through the SMARTS, including sample results
- Sample Results Reporting



## Contact Us

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## Questions?



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