

Rainy Days Newsletter



SCS ENGINEERS

SCS Engineers - Your Protection from the Stormwater Permitting Storm

Welcome to *Rainy Days* - SCS Engineers' newsletter on everything Stormwater! In this installment, we share valuable information about stormwater compliance to help you understand and navigate the sometimes confusing regulatory process – a process that may leave you in a bit of a fog.

January's Topic:

Exceedance Response Action Reports Should have been submitted by January 1, 2017. Did you get yours completed on time or are you working on an approved extension or other?

If your site has been on the State Water Resources Control Board's (SWRCB) Level 1 list during the 2015-2016 IGP calendar year, you should have filed your Exceedance Response Action (ERA) Level Report.

If you have not yet submitted your ERA Report, SCS Can Help!

SCS has performed ERA Reports for a number of facilities across the state covering very different types of businesses from landfills to food distribution warehouses to metal recyclers and wastewater treatment plants.

What happens if you do not file your ERA Report to the State Board?

A Notice of Non-Compliance (NNC) is issued to permittees following late permit registration document uploads to the SMARTS database. From discussions with several regional boards, the focus may not be on submitting these first NNC notices until the beginning of March. The NNC has a 30 day time period to respond. If the 1st NNC receives no response, the Board will issue a follow-up 2nd NNC with another 30-day response period. When the 2nd NNC is not responded to, the Boards determine at that time what penalty will be used for the permittee on an individual basis. These penalties can range from as little as \$5,000 to as much as \$37,500 per day for each day of violation.

January Tips:

Tip # 1 Make sure you file your ERA Report on the SMARTS if you have not already done so.

California's Industrial General Stormwater Permit (Order 2014-0057-DWQ)

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C. 2.a.i. Revise the SWPPP as necessary and implement any additional BMPs identified in the evaluation.

C. 2.a.ii. Certify and submit via SMARTS a Level 1 ERA Report prepared by a QISP that includes the following:

- 1) A summary of the Level 1 ERA Evaluation required; and,
- 2) A detailed description of the SWPPP revisions and any additional BMPs for each parameter that exceeded an NAL.

C. 2.a.iii. Certify and submit via SMARTS the QISP's identification .

Tip # 2 Collect Stormwater samples during qualified rain events.

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B.1. A Qualifying Storm Event (QSE) is a precipitation event that:

- a. Produces a discharge for at least one drainage area; and,
- b. Is preceded by 48 hours with no discharge from any drainage area.

Tip #3 Get daily weather forecasts (<http://www.weather.gov/subscribe>) or you can install a rain gauge at your facility so that you have correct and valid rainfall data for your facility for the entire year.

SCS can help you install a low-cost raingauge and telemetry system that can report daily rainfall totals to online websites for ease of annual downloads and also for sending direct text messages to alert you when rain events occur at your facility.

Tip #4 Make sure that you clearly understand what parts of your facility are industrial (and must comply with the IGP) and which areas perform other business functions (e.g. parking, consumer retail and sales, administration, etc.).

Runoff from non-industrial areas does not have to be sampled so if you can exclude that water from the water that does drain from industrial activity areas, you may reduce your compliance risk.

We hope that you find these tips helpful as you prepare to conduct your routine storm event samplings during the 2016-2017 fall and winter storm season. If you have questions about sampling techniques, how to be prepared for storms, permitting, or anything else, contact Cory Jones at cjones@scsengineers.com. Cory Jones, PE, QSD, QISP ToR, ENV SP is SCS Engineers' Southwest Stormwater Manager.