

# Final Draft Industrial General Permit Overview

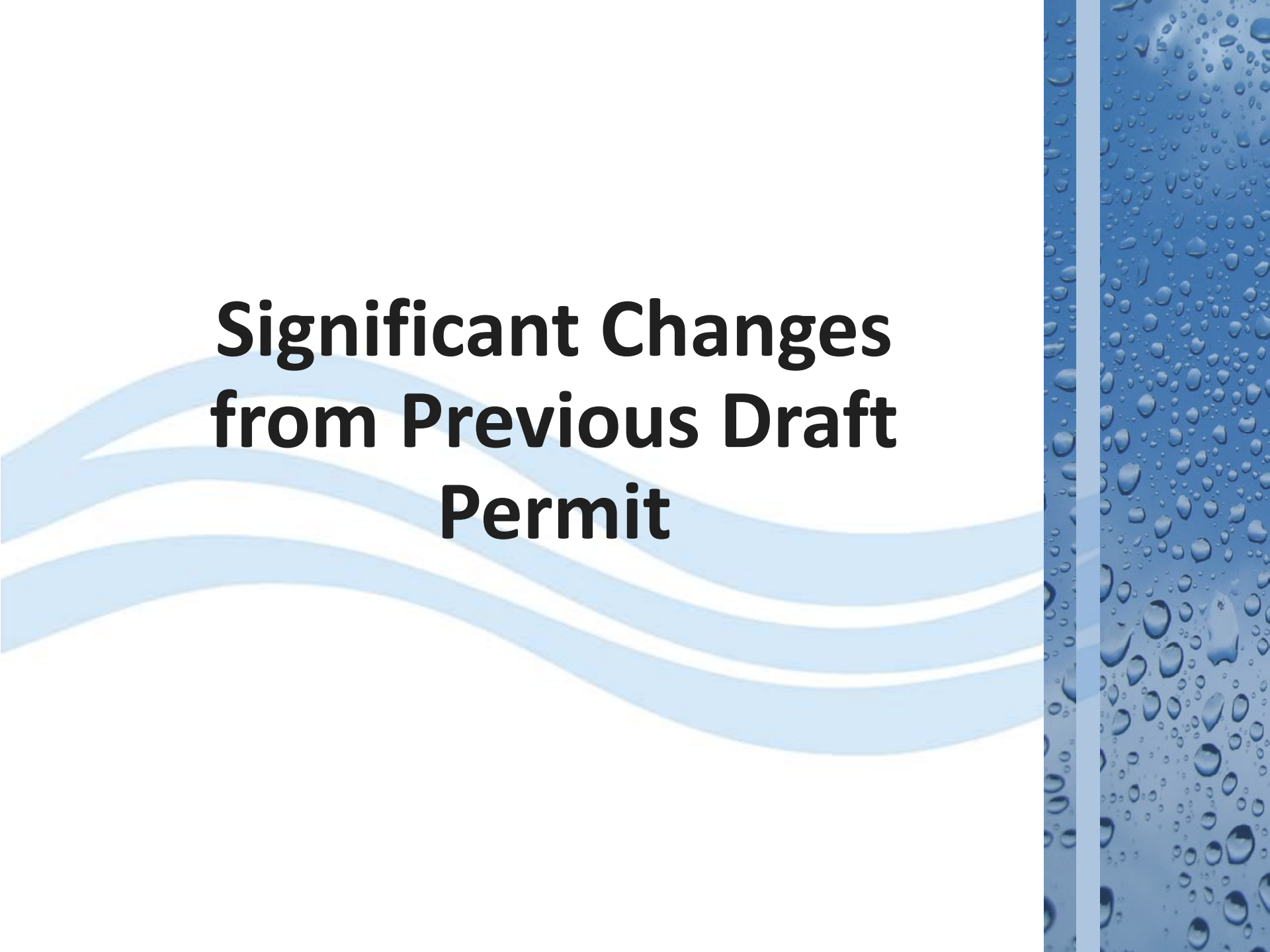
**State Water Resources Control Board  
Division of Water Quality  
Storm Water Program**

# Goals

- Performance Based Model
- Improved Data Quality
- Incentives and Flexibility
- Reduce Compliance Costs

# Industrial General Permit Timeline

1991	Board adopted first industrial general permit
1997	Board adopted second industrial general permit
2003	Board Hearing on 1 <sup>st</sup> draft of industrial general permit
2005	Board Hearing on 2 <sup>nd</sup> draft permit
2005	Board convened a Blue Ribbon Panel of Experts
2006	Blue Ribbon Panel of Experts completed report on Numeric Effluent Limits
2006-2009	Board delayed development of 3 <sup>rd</sup> draft permit (SMARTS, CGP)
2011	Board Hearing on 3 <sup>rd</sup> draft permit
2012	Board Hearing on 4 <sup>th</sup> draft permit
2013	August 21, 2013 - Board Hearing on final draft of the industrial general permit



# **Significant Changes from Previous Draft Permit**

# Requirements for Receiving Permit Coverage, Section II

- The Draft Permit clarifies that the Discharger may appoint a “Duly Authorized Representative” for submittal of all documents other than Permit Registration Documents

# Requirements for Receiving Permit Coverage, Section II

- Language added allowing Dischargers to redact trade secrets for required electronic submittals in SMARTS
- Un-redacted paper copies due within 30 days to the Regional Water Board

# Best Management Practices (BMPs)

## Section X.H

- Minimum BMPs have been revised and Advanced BMPs added for consistency with U.S. EPA's measures

# Total Maximum Daily Loads (TMDLs)

## Section VIII

- Implementation requirements to be included during future amendment of adopted permit (2 years after the adoption)
- Dischargers only required to comply with TMDLs after the adopted permit is amended



# Discharges Subject to 2012 California Ocean Plan Amendments, Section VIII.A

- Applies only to Dischargers with direct outfalls to the ocean
- January 1, 2015 – A monitoring plan must be developed and implemented to obtain coverage under this permit

# Industrial Storm Water Practitioner (QISP), Section XI

- Only one type of QISP
- Dischargers with Level 1 are required to have a QISP
- Compliance Group Leaders are required to be a QISP

# Training Qualifications for California licensed professional engineers and geologists

- The term “Licensee” removed
- Certain California-licensed professional engineers and geologists are eligible to complete self-guided QISP training only
- Must register as a QISP in SMARTS

# Visual Observation Monitoring Requirements, Section XI.A

- Monthly visual observation now includes quarterly authorized and unauthorized non-storm water discharges
- Pre-storm visual observations not required
- Storm water discharge visual observations only required during sampling

# Sampling and Analysis Monitoring Requirements, Section XI.B

- Sampling frequency changed from quarterly to twice in first half of year (July 1<sup>st</sup> – December 31<sup>st</sup>) and twice in second half of year (January 1<sup>st</sup> – June 30<sup>th</sup>)

# Sampling and Analysis Monitoring Requirements, Section XI.B

- Revised definition of Qualifying Storm Event (QSE)
  - Rain gauge not required
  - "Dry weather" interval decreased from 72 hours to 48 hours

# Sampling and Analysis Monitoring Requirements, Section XI.B

- Average Numeric Action Level (NAL) for pH removed
- Option for most Dischargers to initially screen for pH using litmus paper or test kits

# Sampling and Analysis Monitoring Requirements, Section XI.B

- Representative Sampling  
Reduction replaces Sample  
Location Reduction
- Representative Sampling  
Reduction justification required in  
Monitoring Implementation Plan



# Sampling and Analysis Monitoring Requirements, Section XI.B

- Qualified Combined Samples justification is now required in the Monitoring Implementation Plan
- Sampling Frequency Reduction eligibility decreased from 8 to 4 consecutive sampled QSEs below NALs
- Frequency reduction is 2 samples per year

# Exceedance Response Actions (ERAs)

## Section XII

- NALs applicable on permit effective date
- Status changes on July 1<sup>st</sup> of each year
- Level 1 ERA Report date extended to January 1<sup>st</sup> (previously required 60 days after status change)

# Exceedance Response Actions (ERAs)

## Section XII

- Added Level 2 ERA Action Plan (due January 1<sup>st</sup>)
- Level 2 ERA Technical Report (due January 1<sup>st</sup> of next year)
- Level 2 ERA Demonstrations combined into one Level 2 ERA Technical Report

# Exceedance Response Actions (ERAs)

## Section XII

- BAT/BCT Compliance  
Demonstration is now the  
Industrial Activity BMPs Technical  
Report (exceed or not exceed  
future NALs)
- Discharger can submit Level 2 ERA  
Action Plans and Technical  
Reports any time

# Exceedance Response Actions (ERAs)

## Section XII

- Dischargers with Level 2 status eligible for Baseline status if:
  - Industrial Activity BMPs Technical Report is submitted
  - and
  - Sampling from 4 consecutive quarters demonstrates elimination of future NAL exceedances

# Exceedance Response Actions (ERAs)

## Section XII

- BMP Implementation Extension  
Request replaced by Level 2 ERA  
Implementation Extension  
(6 months automatic extension)

# Compliance Groups and Compliance Group Leaders Section XIV

- One Compliance Group type
- Compliance Group leaders must prepare site-specific Level 2 ERA Technical Reports (consolidated Level 2 reports were previously proposed)
- Reduction in sampling - two QSEs per year
- Sampling Frequency Reduction (SFR) - one QSE per year

# Other Changes

- Annual reporting consists of a single compliance checklist
- QISP not required for preparation of initial No Exposure Certification or annual recertification
- Added Special Conditions (Part C) Requirements for Dischargers Claiming “No Discharge” Option in Notice of Non Applicability (No Discharge and hydrologically disconnected)



# Questions?

Leo Cosentini

[lcosentini@waterboards.ca.gov](mailto:lcosentini@waterboards.ca.gov)

(916) 341-5524

Laurel Warddrip

[lwarddrip@waterboards.ca.gov](mailto:lwarddrip@waterboards.ca.gov)

(916) 341-5531

Regan Morey

[rmorey@waterboards.ca.gov](mailto:rmorey@waterboards.ca.gov)

(916) 323-8268