
SWPPP 2024 - 2025
METAL FINISHING ASSOCIATION OF
SOUTHERN CALIFORNIA COMPLIANCE GROUP
SWPPP TRAINING MANUAL
MOORE COMPLIANCE & TRAINING, INC
BERNARD MOORE ToR, QISP
PHILIP MOORE ToR, QISP

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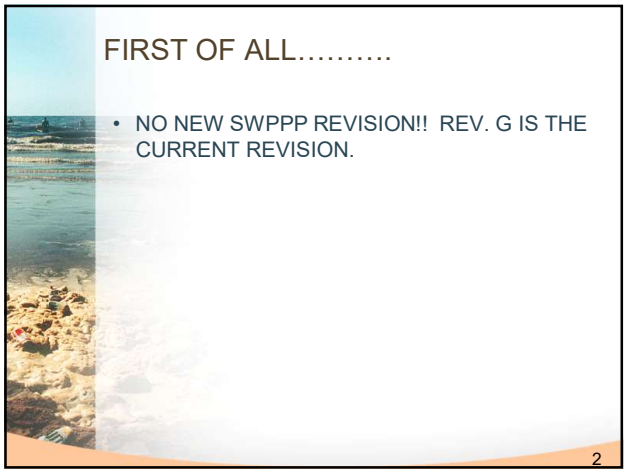
FIRST OF ALL…….
• NO NEW SWPPP REVISION!! REV. G IS THE CURRENT REVISION.
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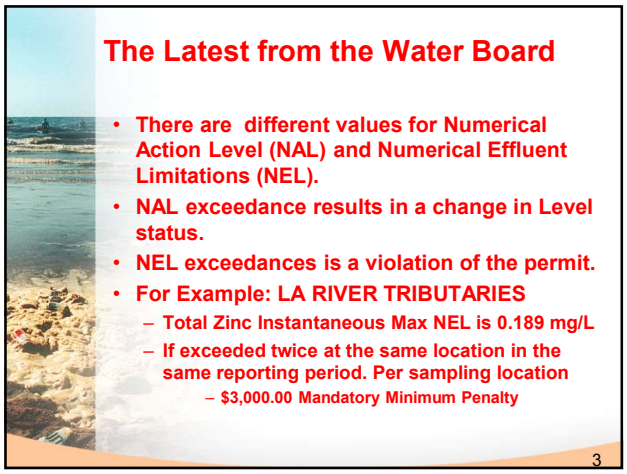
The Latest from the Water Board
• There are different values for Numerical Action Level (NAL) and Numerical Effluent Limitations (NEL).
• NAL exceedance results in a change in Level status.
• NEL exceedances is a violation of the permit.
• For Example: LA RIVER TRIBUTARIES
– Total Zinc Instantaneous Max NEL is 0.189 mg/L
– If exceeded twice at the same location in the same reporting period. Per sampling location
– $3,000.00 Mandatory Minimum Penalty
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GOOD GRIEF ……..

- What do you need to do??
- Know what body of water you discharge into and what the NEL is.
- Information is found In Appendix E of the General Permit.
- Along with being concerned if you move into Level 1 or 2 -- you need to worry about have two NEL violations in the same area in the same reporting year.

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And more grief……

- However, if the NEL value is lower than the instantaneous NAL value for a parameter and the discharger exceeded the NAL twice for the same drainage area within the reporting year, then they would have been in Level 1 for that parameter (or Level 2 depending on whether they were already in Level 1) and also in violation of the permit for the NEL exceedance for that parameter.

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FROM THE WATER BOARD

TMDL Requirements

- A lot of sites have not completed TMDL compliance evaluation (To find out whether they are subject to the requirements or not).
- Some sites conducted TMDL evaluation inaccurately (i.e. misused the online IGP Map Tool)

BMP issues specifically seen in the metal finishing industries:

- Metal shavings
- Materials stored in the outdoor area
- NSWD from process/equipment

Attachment I Option

- Maintain the effective capacity to capture, infiltrate and/or evapotranspire the volume of runoff produced up to and during the 85th percentile 24-hour precipitation event based upon local, historical precipitation data and records

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AND THE LATEST…….

- **YOUR ANNUAL FEE FROM THE WATER BOARD WILL BE BASED UPON YOUR FACILITY SQUARE FOOTAGE. THIS YOU DID, HOPEFULLY LAST MONTH. YOUR FEE SHOULD HAVE BEEN LOWER.**
- WHAT DO YOU NEED TO DO:
- **Log into SMARTS and verify that the square footage is correct. If it needs to be corrected, click on the COI (Change of Information) tab and fill out the information they ask for.**

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STILL IN EFFECT

- WENT INTO EFFECT JULY 1, 2020
  - **1. TOTAL MAXIMUM DAILY LOAD (TMDL) IMPLEMENTATION REQUIREMENTS.**
    - NEED TO LOOK UP ON MAP PROGRAM TO FIND WATER BODY YOU DISCHARGE INTO
    - THEN LOOK UP IN ATTACHMENT E.
    - https://gispublic.waterboards.ca.gov/portal/apps/storymaps/stories/d6af03f78185476daebab41ff39b2942
    - IF THERE IS A PARAMETER THAT YOU DO NOT HAVE ON-SITE – NO TEST!!!
  - 2. ON-SITE CAPTURE AND USE.

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STILL IN EFFECT……..

- **MANATORY** MINIMUM BEST MANAGEMENT PRACTICES. **REVIEW FORMS**
  - » BMPs
  - GOOD HOUSEKEEPING
  - PREVENTATIVE MAINTENANCE
  - SPILL & LEAK PREVENTION & RESPONSE
  - MATERIAL HANDLING & WASTE MANAGEMENT
  - EROSION & SEDIMENT CONTROL
  - EMPLOYEE TRAINING PROGRAM
  - QUALITY ASSURANCE & RECORD KEEPING
- ADVANCED BMPs WHEN THE ABOVE ISN'T ENOUGH!!!!

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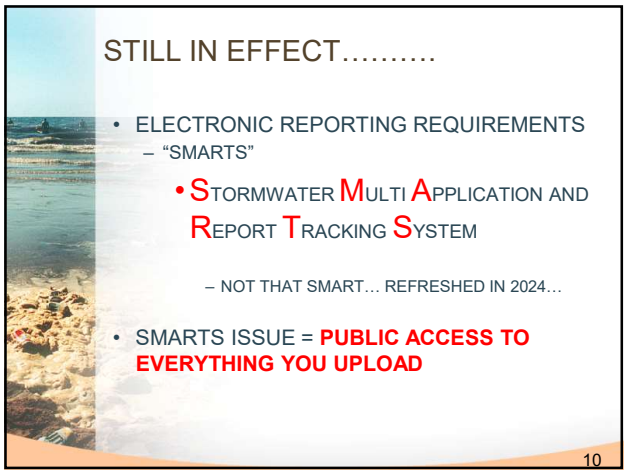
STILL IN EFFECT…….
• ELECTRONIC REPORTING REQUIREMENTS
– "SMARTS"
• STORMWATER MULTI APPLICATION AND REPORT TRACKING SYSTEM
– NOT THAT SMART… REFRESHED IN 2024…
• SMARTS ISSUE = PUBLIC ACCESS TO EVERYTHING YOU UPLOAD
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STILL IN EFFECT…….
• TRAINING EXPECTATIONS & ROLES
– REQUIRES APPROPRIATELY TRAINED PERSONNEL IMPLEMENTING GENERAL PERMIT REQUIREMENTS.
– ADDITIONALLY:
• IF FACILITY ENTERS LEVEL 1 STATUS, LEVEL 1 REPORT MUST BE PREPARED BY COMPLIANCE GROUP LEADER WHO IS A QUALIFIED INDUSTRIAL STORMWATER PRACTITIONER OR "QISP"
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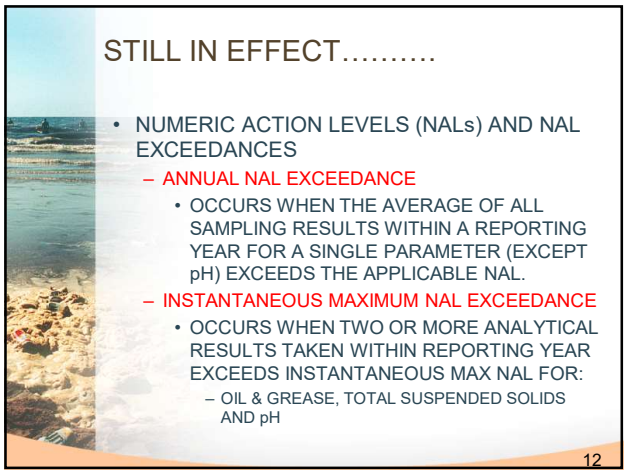
STILL IN EFFECT…….
• NUMERIC ACTION LEVELS (NALs) AND NAL EXCEEDANCES
– ANNUAL NAL EXCEEDANCE
• OCCURS WHEN THE AVERAGE OF ALL SAMPLING RESULTS WITHIN A REPORTING YEAR FOR A SINGLE PARAMETER (EXCEPT pH) EXCEEDS THE APPLICABLE NAL.
– INSTANTANEOUS MAXIMUM NAL EXCEEDANCE
• OCCURS WHEN TWO OR MORE ANALYTICAL RESULTS TAKEN WITHIN REPORTING YEAR EXCEEDS INSTANTANEOUS MAX NAL FOR:
– OIL & GREASE, TOTAL SUSPENDED SOLIDS AND pH
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STILL IN EFFECT…….

- EXCEEDANCE RESPONSE ACTIONS (ERA)
  - DEVELOP AND IMPLEMENT ERAs WHEN AN ANNUAL OR INSTANTANEOUS MAX NAL OCCURS FOR ANY ONE PARAMETER.
    - RESULTS IN STATUS CHANGE FROM BASELINE (WHERE YOU ARE NOW) TO LEVEL 1 STATUS.
      - LEVEL 1 STATUS REQUIRES CONSOLIDATED ERA REPORT PREPARED BY GROUP LEADER.
  - SECOND TIME EXCEEDANCE FOR SAME PARAMETER IN FOLLOWING YEAR =
    - LEVEL 2 STATUS
      - LEVEL 2 REPORT BY GROUP LEADER

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STILL IN EFFECT…….

- ERA CONTINUED……. ESCAPE ROUTES
  - ADDITIONAL BMPs NOT TECHNOLOGICALLY AVAILABLE OR ECONOMICALLY PRACTICABLE AND ACHIEVABLE.
  - SOLELY CAUSED BY NON-INDUSTRIAL POLLUTANT SOURCES.
  - SOLELY ATTRIBUTABLE TO POLLUTANTS FROM NATURAL BACKGROUND SOURCES
    - ALL OF THE ABOVE SUPPORTED BY GROUP LEADER REPORT
- TO GET BACK TO BASELINE YOU NEED **4 CONSECUTIVE** CLEAN SAMPLES

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STILL IN EFFECT…….

- QUALIFYING STORM EVENT (QSE)
  - A PRECIPITATION EVENT THAT:
    - PRODUCES A DISCHARGE FOR A LEAST ONE DRAINAGE AREA; AND
    - IS PROCEEDED BY 48 HOURS WITH NO DISCHARGE FROM ANY DRAINAGE AREA.

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STILL IN EFFECT…….

- SAMPLING PROTOCOLS
  - COLLECT SAMPLES DURING SCHEDULED FACILITY OPERATING HOURS WITHIN 4 HOURS OF:
    - THE START OF THE DISCHARGE DURING SCHEDULED OPERATING HOURS, OR
    - START OF SCHEDULED FACILITY OPERATING HOURS IF THE QSE OCCURRED IN THE PREVIOUS 12 HOURS.

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STILL IN EFFECT…….

- SAMPLING FREQUENCY
  - 2 BETWEEN JULY 1 AND DECEMBER 31
  - 2 BETWEEN JANUARY 1 AND JUNE 30
    - "WET SEASON" ELIMINATED
- **COMPLIANCE GROUPS**
  - **ONLY REQUIRED TO SAMPLE 2 TIMES**
    - **ONE IN THE FIRST HALF AND ONE IN THE SECOND HALF, JULY 1ST – DECEMBER 30TH & JANUARY 1ST – JUNE 30**
  - **GET A RAIN LOGGER! RAINWISE.**

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STILL IN EFFECT…….

- CLEAN WATER ACT SECTION 303(d) IMPAIRMENT
  - GENERAL PERMIT REQUIRES ADDITIONAL SAMPLING PARAMETERS IF THE DISCHARGER CONTRIBUTES POLLUTANTS TO RECEIVING WATER THAT ARE LISTED AS IMPAIRED FOR THOSE POLLUTANTS LISTED IN **CWA 303(d).**
    - For example, if a water body is listed as impaired for copper and your facility has the **potential**, it gets added to your list of what you have to sample. **Sample for it once or twice to be sure and then drop it off the test parameters.**
  - QUESTION 7 ON ANNUAL REPORT

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303(d) ALL ASSESSED WATERS

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303(d) LISTED WATERS

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SWPPP ELEMENTS

- FACILITY NAME AND CONTACT INFORMATION;
- SITE MAP;
- LIST OF MATERIALS.
- DESCRIPTION OF POTENTIAL POLLUTION SOURCES;
- ASSESSMENT OF POTENTIAL POLLUTANT SOURCES;
- MINIMUM BMPs;

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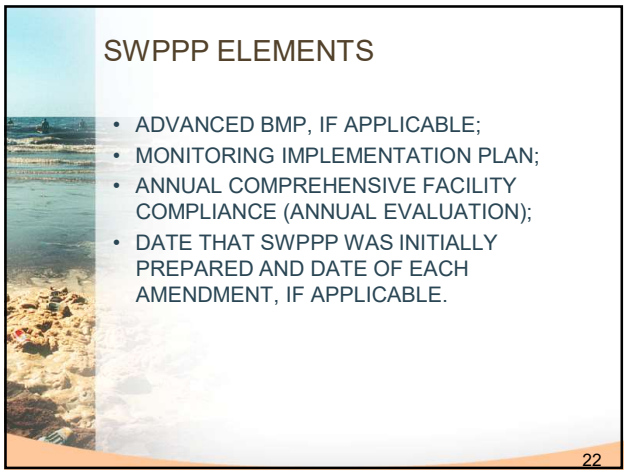
SWPPP ELEMENTS
• ADVANCED BMP, IF APPLICABLE;
• MONITORING IMPLEMENTATION PLAN;
• ANNUAL COMPREHENSIVE FACILITY COMPLIANCE (ANNUAL EVALUATION);
• DATE THAT SWPPP WAS INITIALLY PREPARED AND DATE OF EACH AMENDMENT, IF APPLICABLE.
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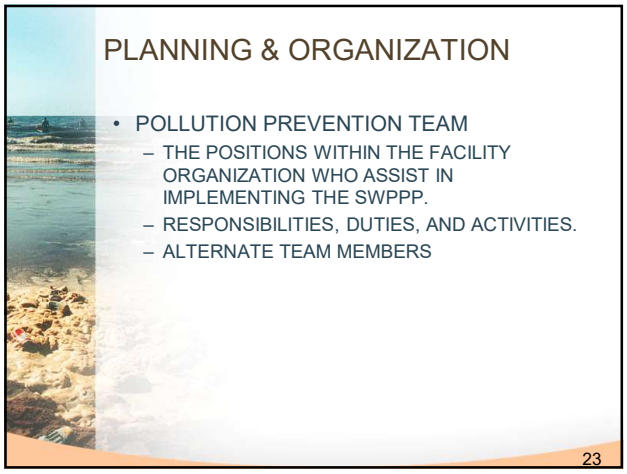
PLANNING & ORGANIZATION
• POLLUTION PREVENTION TEAM
– THE POSITIONS WITHIN THE FACILITY ORGANIZATION WHO ASSIST IN IMPLEMENTING THE SWPPP.
– RESPONSIBILITIES, DUTIES, AND ACTIVITIES.
– ALTERNATE TEAM MEMBERS
23

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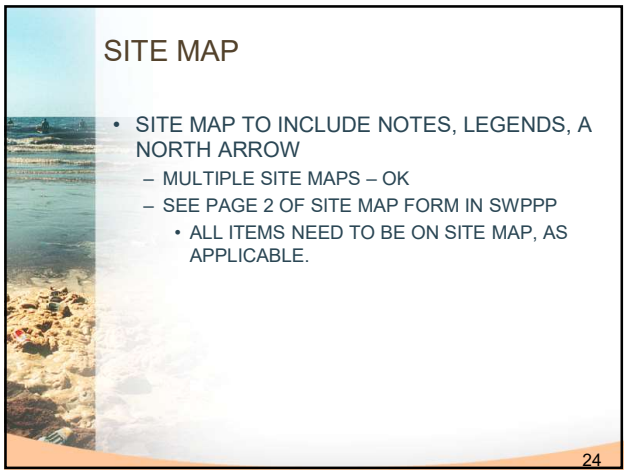
SITE MAP
• SITE MAP TO INCLUDE NOTES, LEGENDS, A NORTH ARROW
– MULTIPLE SITE MAPS – OK
– SEE PAGE 2 OF SITE MAP FORM IN SWPPP
• ALL ITEMS NEED TO BE ON SITE MAP, AS APPLICABLE.
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LIST OF INDUSTRIAL MATERIALS
• SWPPP TO INCLUDE A LIST OF INDUSTRIAL MATERIALS HANDLED AT THE FACILITY.
– WHERE STORED, RECEIVED, SHIPPED, AND HANDLED
– AS WELL AS THE TYPICAL QUANTITIES AND HANDLING FREQUENCY.
25

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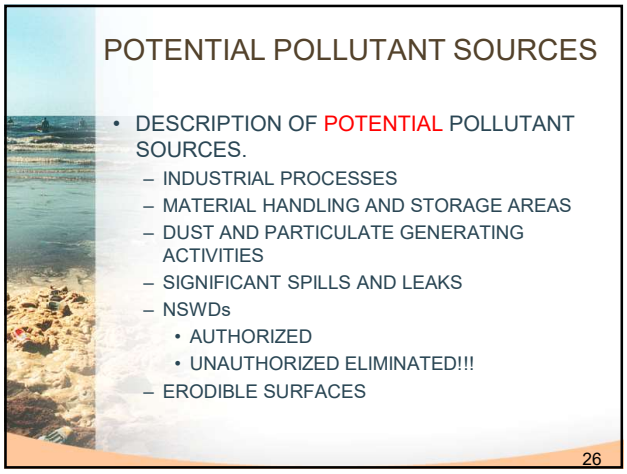
POTENTIAL POLLUTANT SOURCES
• DESCRIPTION OF POTENTIAL POLLUTANT SOURCES.
– INDUSTRIAL PROCESSES
– MATERIAL HANDLING AND STORAGE AREAS
– DUST AND PARTICULATE GENERATING ACTIVITIES
– SIGNIFICANT SPILLS AND LEAKS
– NSWDs
• AUTHORIZED
• UNAUTHORIZED ELIMINATED!!!
– ERODIBLE SURFACES
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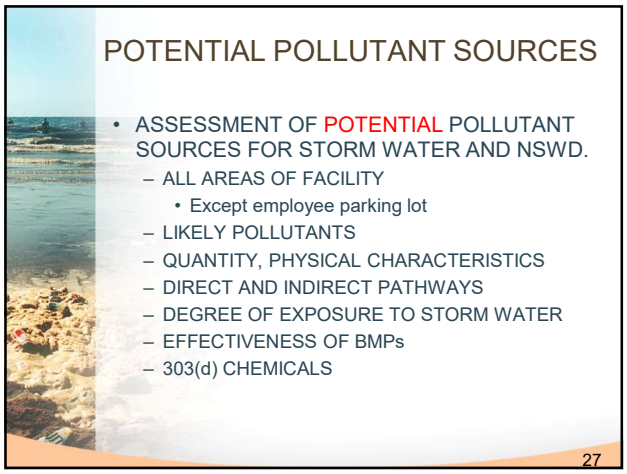
POTENTIAL POLLUTANT SOURCES
• ASSESSMENT OF POTENTIAL POLLUTANT SOURCES FOR STORM WATER AND NSWD.
– ALL AREAS OF FACILITY
• Except employee parking lot
– LIKELY POLLUTANTS
– QUANTITY, PHYSICAL CHARACTERISTICS
– DIRECT AND INDIRECT PATHWAYS
– DEGREE OF EXPOSURE TO STORM WATER
– EFFECTIVENESS OF BMPs
– 303(d) CHEMICALS
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NON-STORM WATER DISCHARGES NSWDs

- **UNAUTHORIZED** NSWDs ARE TO BE ELIMINATED
  - WASHING OF VEHICLES, EQUIPMENT, BUILDINGS, OR PAVEMENT.
- AUTHORIZED NSWDs – TO BE MANAGED
  - NOT A SIGNIFICANT SOURCE OF POLLUTANTS
    - FIRE-HYDRANT-FIRE PREVENTION FLUSHING, POTABLE WATER SOURCES, ATMOSPHERIC CONDENSATE FROM A/C
    - DRINKING FOUNTAIN WATER, IRRIGATION WATER

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BEST MANAGEMENT PRACTICES (BMPs)

- MANDATORY MINIMUM BMPs
  - 1. GOOD HOUSEKEEPING
    - OBSERVE ALL OUTDOOR AREAS
      - MATERIAL TRACKING
      - INDUSTRIAL MATERIAL STORAGE
  - 2. PREVENTATIVE MAINTENANCE
    - EQUIPMENT & SYSTEMS USED OUTDOORS
      - PROCEDURES FOR MAINTENANCE
  - 3. SPILL & LEAK PREVENTION & RESPONSE
    - CONTROL/MINIMIZE SPILLS & LEAKS
      - SPILL KITS
      - TRAIN SPILL & LEAK RESPONSE PERSONNEL

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BEST MANAGEMENT PRACTICES (BMPs)

- MINIMUM BMPs continued…..
  - 4. MATERIAL HANDLING & WASTE MANAGEMENT
    - PREVENT OR MINIMIZE HANDLING OF INDUSTRIAL MATERIALS OR WASTES THAT CAN BE MOBILIZED BY CONTACT WITH STORM WATER
    - COVER WASTE DISPOSAL CONTAINERS
  - 5. EROSION & SEDIMENT CONTROLS
    - WIND EROSION CONTROLS
    - STORM WATER CONTROLS

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BEST MANAGEMENT PRACTICES (BMPs)

- MINIMUM BMPs continued…..
  - 6. EMPLOYEE TRAINING PROGRAM
    - ENSURE ALL TEAM MEMBERS ARE TRAINED
    - DOCUMENT IT
  - 7. QUALITY ASSURANCE & RECORD KEEPING
    - DEVELOP MANAGEMENT PROCEDURES
    - TRACK & RECORD IMPLEMENTATION
    - MAINTAIN RECORDS FOR 5 YEARS.
- **DOCUMENTED MONTHLY BMP INSPECTIONS REQUIRED!!!**

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ADVANCED BMPs

- ADVANCED BMPs MAY BE NEEDED TO ACHIEVE COMPLIANCE.
  - EXPOSURE MINIMIZATION BMPs
  - STORM WATER CONTAINMENT & DISCHARGE REDUCTION BMPs
  - TREATMENT CONTROL BMPs
  - OTHER
    - WHATEVER IS NECESSARY TO MEET EFFLUENT LIMITATIONS OF PERMIT
    - INFILTRATE OR REUSE STORM WATER WHERE FEASIBLE.

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BMP DESCRIPTIONS

- SITE SPECIFIC !!!!!!!!!!
- POLLUTANTS BMPs WILL REDUCE
- FREQUENCY
- LOCATION
- INDIVIDUALS RESPONSIBLE
- TOOLS & EQUIPMENT NECESSARY

- BMP SUMMARY TABLE

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MONITORING IMPLEMENTATION PLAN (MIP)

- IDENTIFICATION OF TEAM MEMBERS
- DISCHARGE LOCATIONS
- VISUAL OBSERVATION PROCEDURES
- VISUAL OBSERVATION RESPONSE
  - MONTHLY
  - SAMPLING EVENT VISUAL OBSERVATION
- INSTRUMENT CALIBRATION PROCEDURE
- CHAIN OF CUSTODY

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MONITORING

- VISUAL OBSERVATIONS
  - **MONTHLY VISUAL OBSERVATIONS**
    - AT **LEAST ONCE PER CALENDAR MONTH**
    - VISUALLY OBSERVE EACH DRAINAGE AREA
      - NSWDs
      - OUTDOOR INDUSTRIAL EQUIPMENT & STORAGE AREAS
      - POTENTIAL SOURCES OF POLLUTANTS
    - CONDUCTED DURING DAYLIGHT HOURS AND DAYS WITHOUT PRECIPITATION

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MONITORING

- VISUAL OBSERVATIONS … CONTINUED
  - **SAMPLING EVENT VISUAL OBSERVATION**
    - VISUAL OBSERVATION CONDUCTED AT SAME TIME SAMPLING OCCURS AT EACH LOCATION.
    - OBSERVE AND RECORD
      - PRESENCE OF ABSENCE OF
        - » FLOATING MATERIALS/DEBRIS
        - » OIL & GREASE
        - » DISCOLORATIONS – TURBIDITY
        - » ODORS
        - » TRASH/DEBRIS/GARBAGE
        - » SOURCE OF POLLUTANTS

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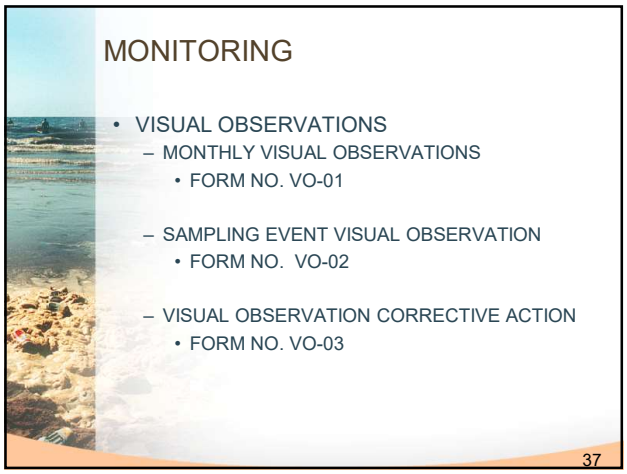
MONITORING
• VISUAL OBSERVATIONS
– MONTHLY VISUAL OBSERVATIONS
• FORM NO. VO-01
– SAMPLING EVENT VISUAL OBSERVATION
• FORM NO. VO-02
– VISUAL OBSERVATION CORRECTIVE ACTION
• FORM NO. VO-03
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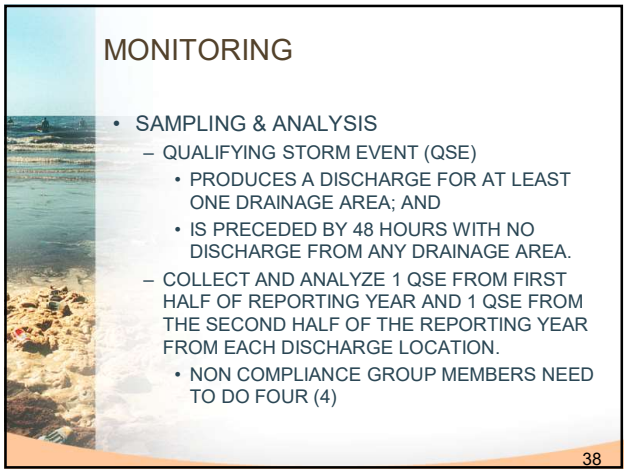
MONITORING
• SAMPLING & ANALYSIS
– QUALIFYING STORM EVENT (QSE)
• PRODUCES A DISCHARGE FOR AT LEAST ONE DRAINAGE AREA; AND
• IS PRECEDED BY 48 HOURS WITH NO DISCHARGE FROM ANY DRAINAGE AREA.
– COLLECT AND ANALYZE 1 QSE FROM FIRST HALF OF REPORTING YEAR AND 1 QSE FROM THE SECOND HALF OF THE REPORTING YEAR FROM EACH DISCHARGE LOCATION.
• NON COMPLIANCE GROUP MEMBERS NEED TO DO FOUR (4)
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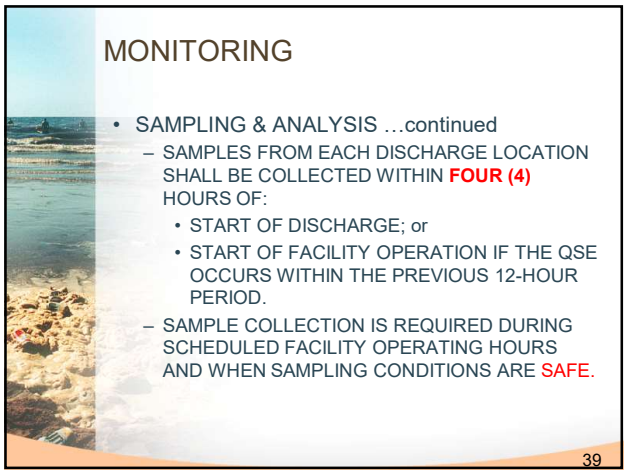
MONITORING
• SAMPLING & ANALYSIS …continued
– SAMPLES FROM EACH DISCHARGE LOCATION SHALL BE COLLECTED WITHIN FOUR (4) HOURS OF:
• START OF DISCHARGE; or
• START OF FACILITY OPERATION IF THE QSE OCCURS WITHIN THE PREVIOUS 12-HOUR PERIOD.
– SAMPLE COLLECTION IS REQUIRED DURING SCHEDULED FACILITY OPERATING HOURS AND WHEN SAMPLING CONDITIONS ARE SAFE.
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WHAT ABOUT NO RAIN????

- IF NO QSE, EXPLAIN IN ANNUAL REPORT AS YOU HAVE BEEN DOING.
- YOU ARE **NOT** REQUIRED TO MAKE UP THESE SAMPLING EVENTS IN SUBSEQUENT REPORT YEARS.
  - THIS IS A CHANGE FROM THE OLD PERMIT.

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MONITORING

- SAMPLING & ANALYSIS …continued
  - ALL COLLECTED SAMPLES SHALL BE ANALYZED FOR THE FOLLOWING PARAMETERS:
  - TOTAL SUSPENDED SOLIDS (TSS);
  - OIL AND GREASE (O&G)
  - pH (WITHIN 15 MINUTES) BY DISCHARGER
  - SIC CODE PARAMETERS
    - ZINC, ALUMINUM, IRON & NITRATE + NITRITE
  - LOCAL WATER BOARD REQUIREMENTS
    - TOTAL CHROMIUM

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BE AWARE
YOU MAY HAVE TO DO MORE

- FROM THE PERMIT:
- 6. The Discharger shall analyze all collected samples for the following parameters:
  - **c. Additional parameters identified by the Discharger on a facility-specific basis that serve as indicators of the presence of all industrial pollutants identified in the pollutant source assessment** (Section X.G.2). These additional parameters may be modified (added or removed) in accordance with any updated SWPPP pollutant source assessment;

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TOTAL SUSPENDED SOLIDS

- Total Suspended Solids (TSS) is an indicator of the un-dissolved solids that are present in storm water discharge. Sources of TSS include sediment from erosion, and dirt from impervious (i.e., paved) areas. Many pollutants adhere to sediment particles; therefore, reducing sediment will reduce the amount of these pollutants in storm water discharge.

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OIL AND GREASE

- Oil and Grease (O&G) is a measure of the amount of O&G present in storm water discharge. At very low concentrations, O&G can cause sheen on the surface of water. O&G can adversely affect aquatic life, create unsightly floating material, and make water undrinkable. Sources of O&G include, but are not limited to, maintenance shops, vehicles, machines and roadways.

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pH

- pH is a numeric measurement of the hydrogen-ion concentration. Many industrial facilities handle materials that can affect pH. A sample is considered to have a neutral pH if it has a value of 7. At values less than 7, water is considered acidic; above 7 it is considered alkaline or basic. Pure rain water in California typically has a pH value of approximately 7.
- **NOTE: You need to do this yourself within 15 minutes and record the results.**

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MONITORING

- SAMPLING & ANALYSIS …continued
  - **REPRESENTATIVE SAMPLING REDUCTION**
    - NUMBER OF LOCATION TO BE SAMPLED IN EACH DRAINAGE AREA CAN BE REDUCED IF THE ACTIVITIES, BMPs AND PHYSICAL CHARACTERISTICS ARE SUBSTANTIALLY SIMILAR.
      - FILL OUT JUSTIFICATION FORM, CERTIFY AND UPLOAD.
  - **QUALIFIED COMBINED SAMPLES**
    - LAB MAY COMBINE AS MANY AS FOUR (4) DISCHARGE LOCATIONS IF SIMILAR TO ONE ANOTHER.
      - FILL OUT JUSTIFICATION FORM & UPLOAD

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QUALIFIED COMBINED SAMPLES = COST REDUCTION

- WHY THE EXTRA PAPERWORK???
  - If you have collected enough samples and they are all the same (more or less):
  - FILL OUT THE "QUALIFIED COMBINED SAMPLES JUSTIFICATION" FORM No. SW13, UPLOAD THE REVISED PART OF THE SWPPP INTO SMARTS.
  - ONCE THIS IS DONE THE LAB CAN COMBINE UP TO 4 SAMPLES INTO ONE.

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MONITORING

- SAMPLING & ANALYSIS …continued
  - SAMPLING FREQUENCY REDUCTION CERTIFICATION
    - THE NUMBER OF SAMPLING CAN BE REDUCED TO ONCE A YEAR IF:
      - FOUR CONSECUTIVE QSEs DID NOT EXCEED ANY NALs; AND
      - ALL REPORTING AND SWPPP IS CURRENT.
        - » CERTIFY AND UPLOAD
      - ONE NAL AND YOU ARE BACK TO 2!!!!

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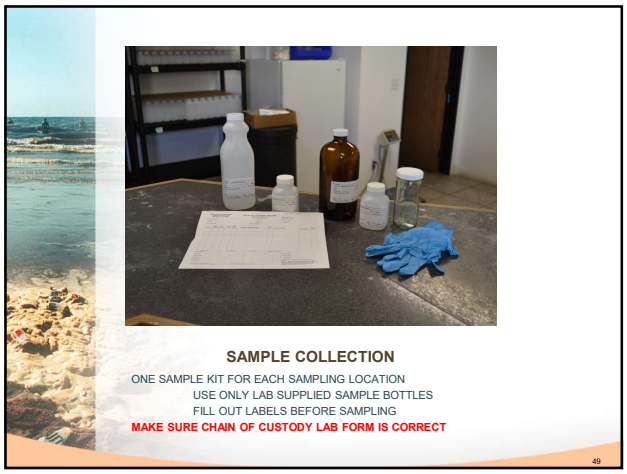
SAMPLE COLLECTION
ONE SAMPLE KIT FOR EACH SAMPLING LOCATION
USE ONLY LAB SUPPLIED SAMPLE BOTTLES
FILL OUT LABELS BEFORE SAMPLING
MAKE SURE CHAIN OF CUSTODY LAB FORM IS CORRECT
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SAMPLE COLLECTION
FILL OUT BEFORE SAMPLING
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SAMPLING COLLECTION
CREATE SANDBAG BERM. BERM SHOULD BE BIG HIGH ENOUGH TO SUBMERGE ALL BOTTLES EXCEPT BROWN ONE. CAP BOTTLE WHEN SUBMERGED.
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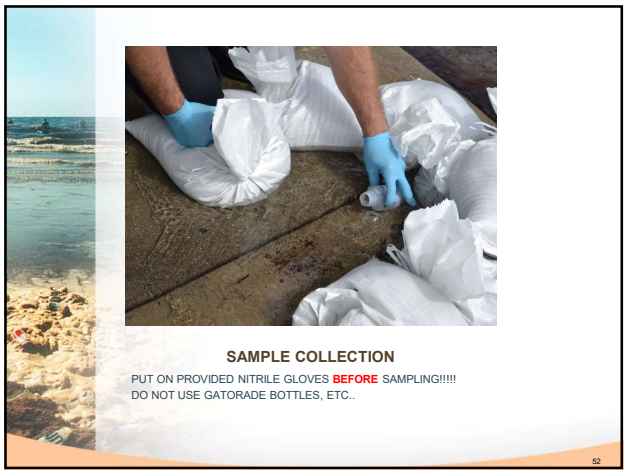
SAMPLE COLLECTION
PUT ON PROVIDED NITRILE GLOVES BEFORE SAMPLING!!!!!
DO NOT USE GATORADE BOTTLES, ETC..
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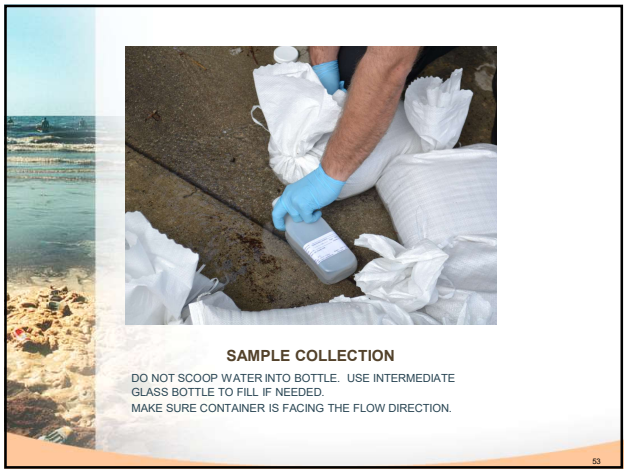
SAMPLE COLLECTION
DO NOT SCOOP WATER INTO BOTTLE. USE INTERMEDIATE GLASS BOTTLE TO FILL IF NEEDED.
MAKE SURE CONTAINER IS FACING THE FLOW DIRECTION.
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SAMPLE COLLECTION
FOR OIL & GREASE (LARGE AMBER BOTTLE) FILL AS MUCH AS YOU CAN FROM FLOW.
DON'T SCOOP
54

54


SAMPLE COLLECTION
FILL BOTTLE TO TOP WITH INTERMEDIATE CLEAR GLASS BOTTLE UNTIL FILLED TO THE TOP
55

55


SAMPLE COLLECTION
BE SURE TO FILL TO THE TOP
56

56


pH FIELD TEST
pH DONE WITHIN 15 MINUTES BY DISCHARGER
USE STORM EVENT SAMPLING PROCEDURE & RECORD FORM (SWS01)
57

57


STORAGE OF SAMPLES
KEEP SAMPLES OUT OF SUNLIGHT.
REFRIGERATE IMMEDIATELY AFTER COLLECTION
4 DEGREES CELSIUS
58

58


STORAGE OF SAMPLES
USE ICE CHEST IF NEEDED TO KEEP SAMPLES AT 4 DEGREES CELSIUS.
ICE CHEST ALSO USED TO UPS OVERNIGHT.
59

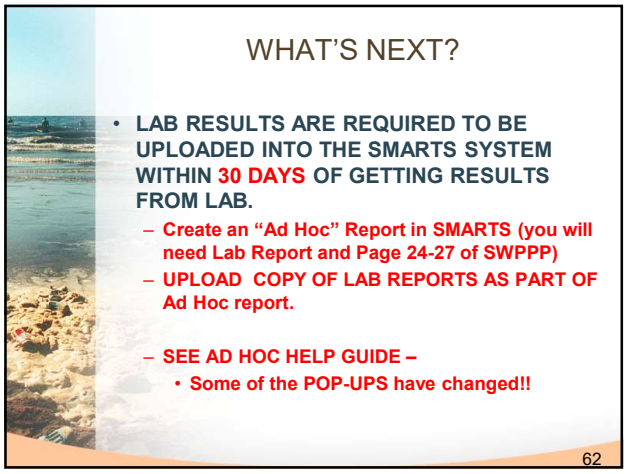
59


SAMPLES COLLECTED
NOW WHAT!!
• COMPLETE THE PAPERWORK
– LAB CHAIN OF CUSTODY (COC)
– SWPPP FORM SWS01
• CALL LAB FOR PICK UP
– OR SHIP OVERNIGHT
• KEEP SAMPLES AT 4 DEGREES CELSIUS
60

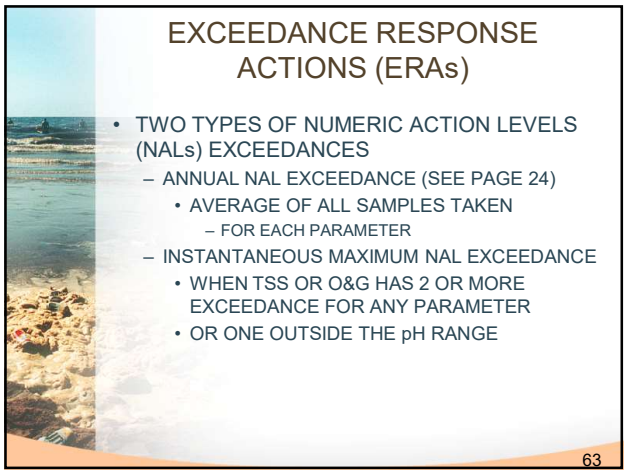
60


SAMPLING EVENT
VISUAL OBSERVATION
• DON'T FORGET TO FILL OUT THE SAMPLING EVENT VISUAL OBSERVATION FORM (VO-02) FOR THE EVENT YOU JUST SAMPLED.
61

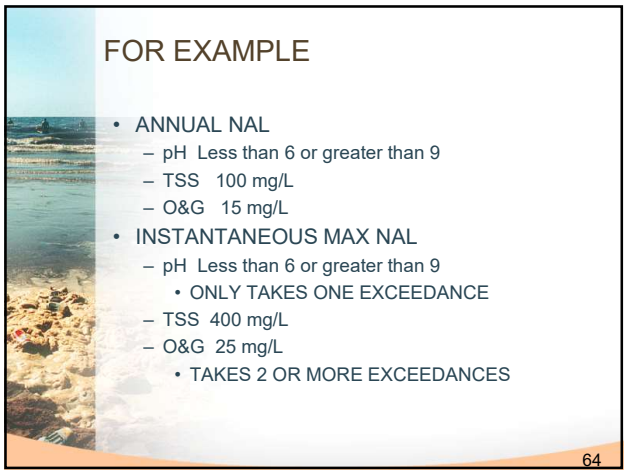
61


WHAT'S NEXT?
• LAB RESULTS ARE REQUIRED TO BE UPLOADED INTO THE SMARTS SYSTEM WITHIN 30 DAYS OF GETTING RESULTS FROM LAB.
– Create an "Ad Hoc" Report in SMARTS (you will need Lab Report and Page 24-27 of SWPPP)
– UPLOAD COPY OF LAB REPORTS AS PART OF Ad Hoc report.
– SEE AD HOC HELP GUIDE –
• Some of the POP-UPS have changed!!
62

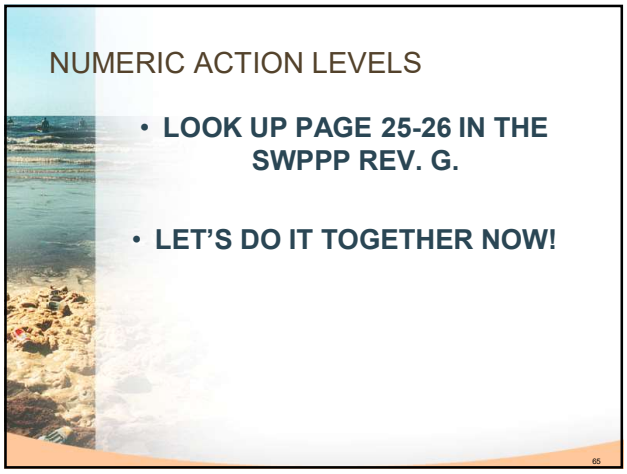
62


EXCEEDANCE RESPONSE ACTIONS (ERAs)
• TWO TYPES OF NUMERIC ACTION LEVELS (NALs) EXCEEDANCES
– ANNUAL NAL EXCEEDANCE (SEE PAGE 24)
• AVERAGE OF ALL SAMPLES TAKEN
– FOR EACH PARAMETER
– INSTANTANEOUS MAXIMUM NAL EXCEEDANCE
• WHEN TSS OR O&G HAS 2 OR MORE EXCEEDANCE FOR ANY PARAMETER
• OR ONE OUTSIDE THE pH RANGE
63

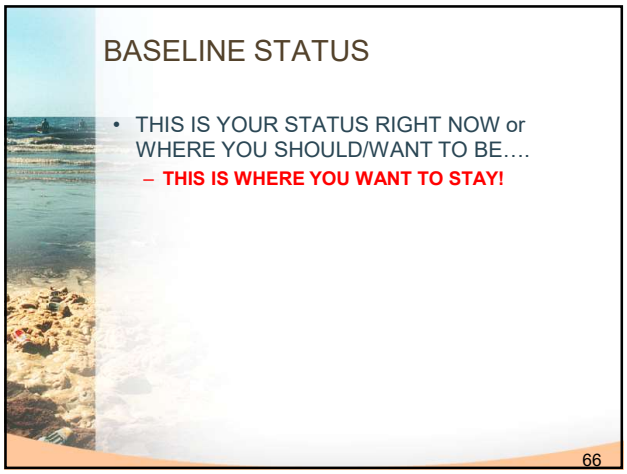
63


FOR EXAMPLE
• ANNUAL NAL
– pH Less than 6 or greater than 9
– TSS 100 mg/L
– O&G 15 mg/L
• INSTANTANEOUS MAX NAL
– pH Less than 6 or greater than 9
• ONLY TAKES ONE EXCEEDANCE
– TSS 400 mg/L
– O&G 25 mg/L
• TAKES 2 OR MORE EXCEEDANCES
64

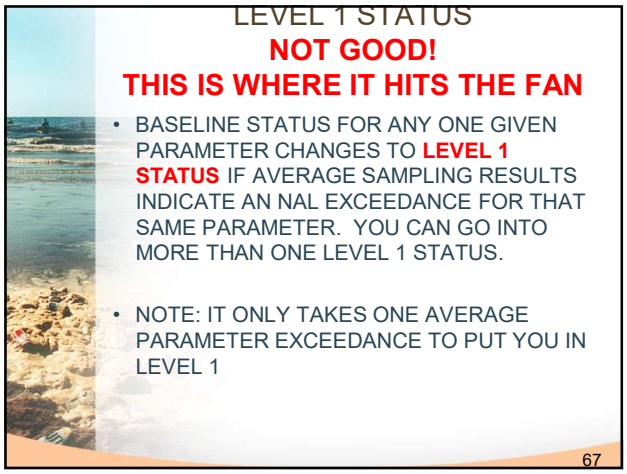
64


NUMERIC ACTION LEVELS
• LOOK UP PAGE 25-26 IN THE SWPPP REV. G.
• LET'S DO IT TOGETHER NOW!
65

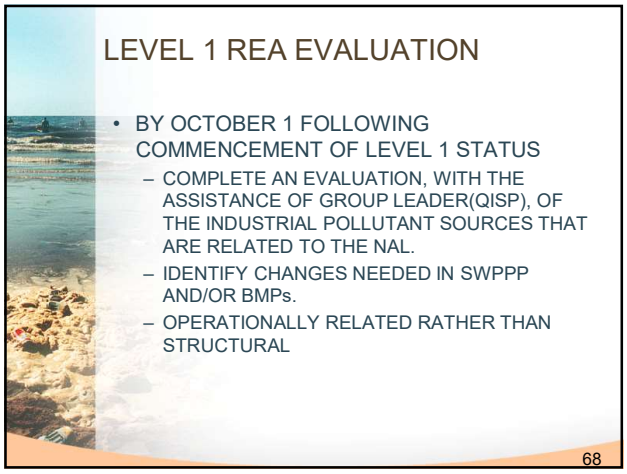
65


BASELINE STATUS
• THIS IS YOUR STATUS RIGHT NOW or WHERE YOU SHOULD/WANT TO BE….
– THIS IS WHERE YOU WANT TO STAY!
66

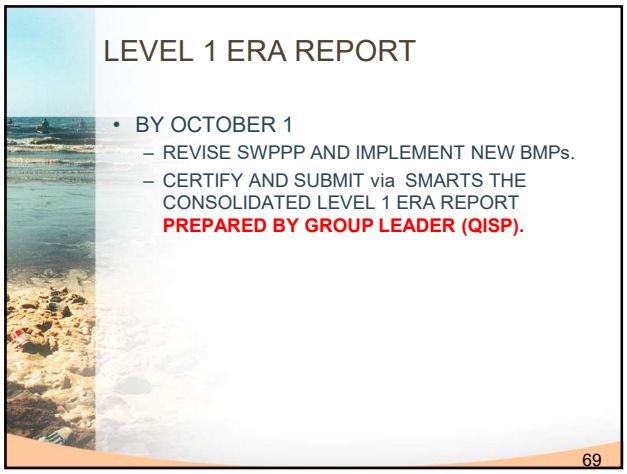
66


LEVEL 1 STATUS
NOT GOOD!
THIS IS WHERE IT HITS THE FAN
• BASELINE STATUS FOR ANY ONE GIVEN PARAMETER CHANGES TO LEVEL 1 STATUS IF AVERAGE SAMPLING RESULTS INDICATE AN NAL EXCEEDANCE FOR THAT SAME PARAMETER. YOU CAN GO INTO MORE THAN ONE LEVEL 1 STATUS.
• NOTE: IT ONLY TAKES ONE AVERAGE PARAMETER EXCEEDANCE TO PUT YOU IN LEVEL 1
67

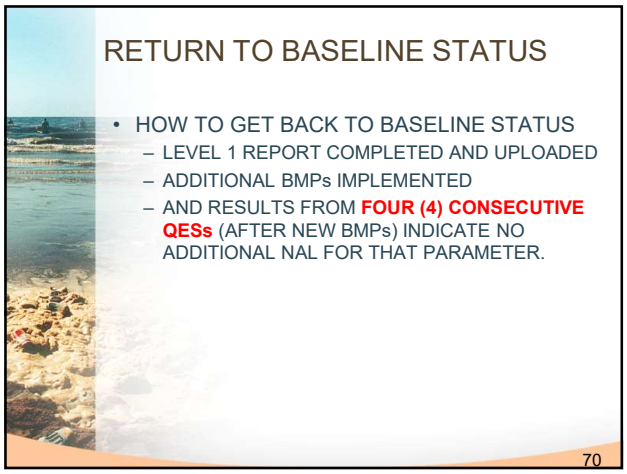
67


LEVEL 1 REA EVALUATION
• BY OCTOBER 1 FOLLOWING COMMENCEMENT OF LEVEL 1 STATUS
– COMPLETE AN EVALUATION, WITH THE ASSISTANCE OF GROUP LEADER(QISP), OF THE INDUSTRIAL POLLUTANT SOURCES THAT ARE RELATED TO THE NAL.
– IDENTIFY CHANGES NEEDED IN SWPPP AND/OR BMPs.
– OPERATIONALLY RELATED RATHER THAN STRUCTURAL
68

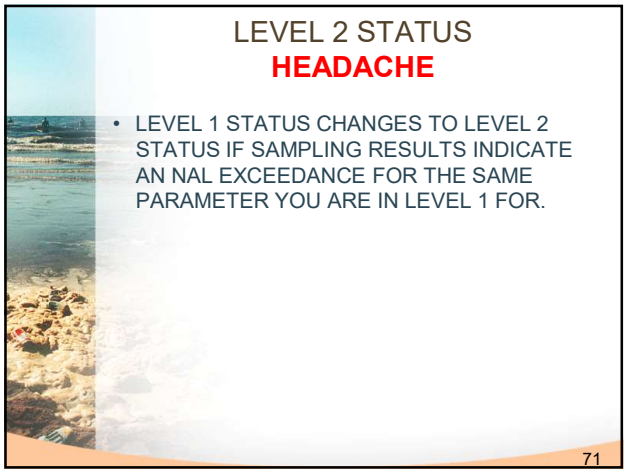
68


LEVEL 1 ERA REPORT
• BY OCTOBER 1
– REVISE SWPPP AND IMPLEMENT NEW BMPs.
– CERTIFY AND SUBMIT via SMARTS THE CONSOLIDATED LEVEL 1 ERA REPORT PREPARED BY GROUP LEADER (QISP).
69

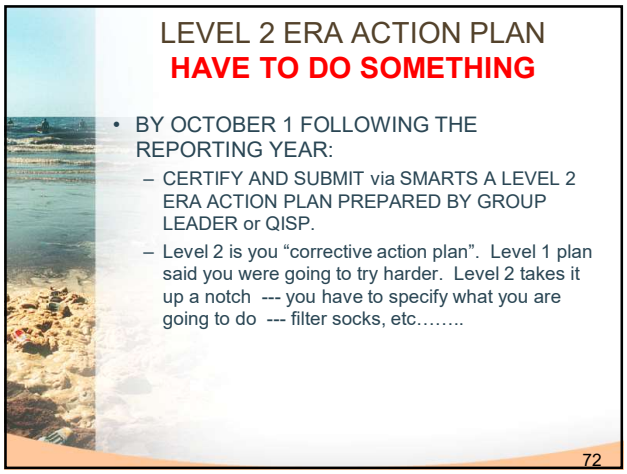
69


RETURN TO BASELINE STATUS
• HOW TO GET BACK TO BASELINE STATUS
– LEVEL 1 REPORT COMPLETED AND UPLOADED
– ADDITIONAL BMPs IMPLEMENTED
– AND RESULTS FROM FOUR (4) CONSECUTIVE QESs (AFTER NEW BMPs) INDICATE NO ADDITIONAL NAL FOR THAT PARAMETER.
70

70


LEVEL 2 STATUS
HEADACHE
• LEVEL 1 STATUS CHANGES TO LEVEL 2 STATUS IF SAMPLING RESULTS INDICATE AN NAL EXCEEDANCE FOR THE SAME PARAMETER YOU ARE IN LEVEL 1 FOR.
71

71


LEVEL 2 ERA ACTION PLAN
HAVE TO DO SOMETHING
• BY OCTOBER 1 FOLLOWING THE REPORTING YEAR:
– CERTIFY AND SUBMIT via SMARTS A LEVEL 2 ERA ACTION PLAN PREPARED BY GROUP LEADER or QISP.
– Level 2 is you “corrective action plan”. Level 1 plan said you were going to try harder. Level 2 takes it up a notch --- you have to specify what you are going to do --- filter socks, etc……..
72

72


LEVEL 2 ERA TECHNICAL REPORT
DO IT
• BY JANUARY 1 AFTER THE SUBMITTAL OF THE LEVEL 2 ERA ACTION PLAN:
– CERTIFY AND SUBMIT via SMARTS A LEVEL 2 TECHNICAL REPORT PREPARED BY GROUP LEADER(QISP).
• INDUSTRIAL ACTIVITY BMPs DEMONSTRATION
• NON-INDUSTRIAL POLLUTANT SOURCE DEMONSTRATION
• NATURAL BACKGROUND POLLUTANT SOURCE DEMONSTRATION
73

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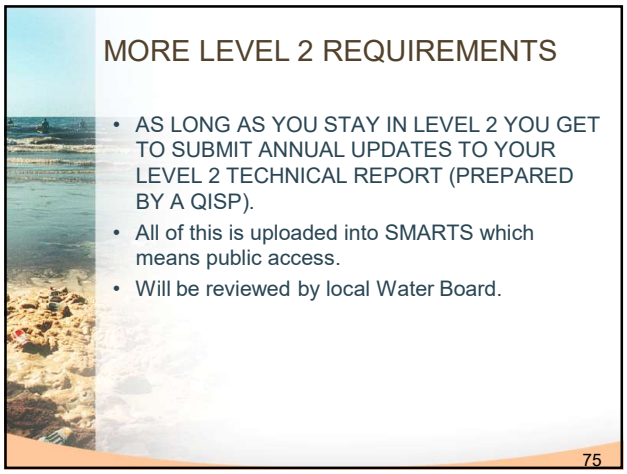
LEVEL 2 TECHNICAL REPORT
NO CHOICE
• LEVEL 2 TECHNICAL REPORT
– Description of pollutant sources.
– Evaluation of implemented BMPs.
Did your Level 2 action plan work?
If not, what are you going to do about it.
74

74


MORE LEVEL 2 REQUIREMENTS
• AS LONG AS YOU STAY IN LEVEL 2 YOU GET TO SUBMIT ANNUAL UPDATES TO YOUR LEVEL 2 TECHNICAL REPORT (PREPARED BY A QISP).
• All of this is uploaded into SMARTS which means public access.
• Will be reviewed by local Water Board.
75

75

RETURN TO BASELINE STATUS

- AFTER SUBMITTING 20 LBS. OF PAPER WORK AND
  - RESULTS FROM **FOUR (4) CONSECUTIVE QESs** INDICATE NO ADDITIONAL NAL FOR THAT PARAMETER.
- ONLY TAKES ONE "Oh %$&#" TO PUT YOU BACK INTO LEVEL 2 STATUS
  - AND PAPER WORK STARTS ALL OVER AGAIN

76

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COMPLIANCE GROUP LEADERS

- BE A CERTIFIED TRAINER OF RECORD (ToR)
  - WHICH MAKES THEM A QISP TOO
- PREPARE A CONSOLIDATED LEVEL 1 ERA REPORT FOR GROUP MEMBERS IN LEVEL 1
- PREPARE LEVEL 2 ERA ACTION PLAN FOR EACH LEVEL 2 PARTICIPANT
- PREPARE A LEVEL 2 ERA TECHNICAL REPORT FOR EACH LEVEL 2 PARTICIPANT
- INSPECT ALL FACILITIES AT **LEAST ONCE** PER REPORTING YEAR.

77

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ANOTHER REASON TO STAY IN BASELINE

- COMPLIANCE GROUP MEMBERS ENTERING LEVEL 1 STATUS WILL BE ASSESSED **ADDITIONAL FEE** TO COVER THE COST OF THE LEVEL 1 EVALUATION AND CONSOLIDATED LEVEL 1 REPORT.
- GOING INTO LEVEL 2
  - Level 2 Action Plan: ADDITIONAL FEE.
  - Level 2 Technical Report: ADDITIONAL FEE

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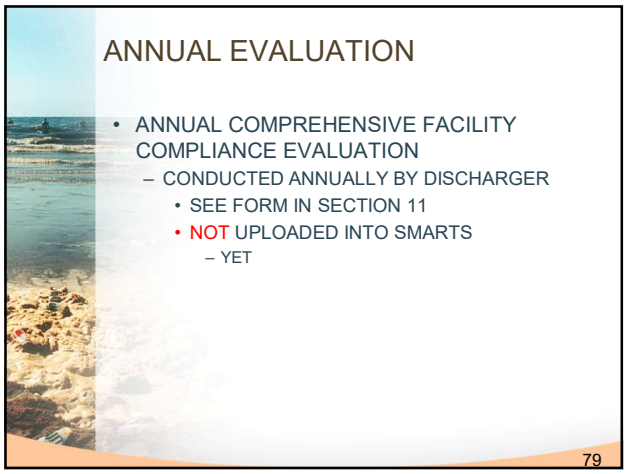
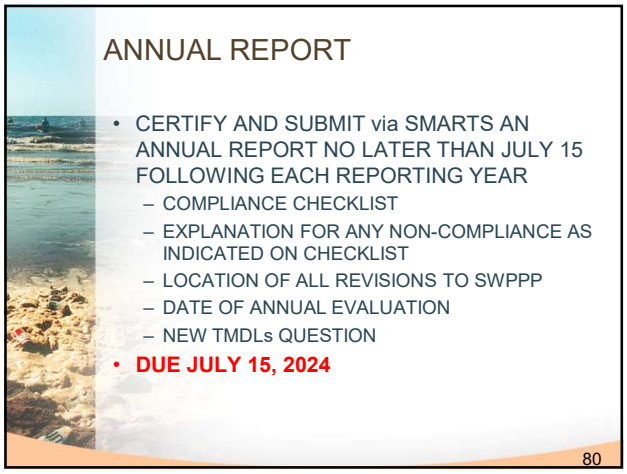

ANNUAL EVALUATION
• ANNUAL COMPREHENSIVE FACILITY COMPLIANCE EVALUATION
– CONDUCTED ANNUALLY BY DISCHARGER
• SEE FORM IN SECTION 11
• NOT UPLOADED INTO SMARTS
– YET
79

79


ANNUAL REPORT
• CERTIFY AND SUBMIT via SMARTS AN ANNUAL REPORT NO LATER THAN JULY 15 FOLLOWING EACH REPORTING YEAR
– COMPLIANCE CHECKLIST
– EXPLANATION FOR ANY NON-COMPLIANCE AS INDICATED ON CHECKLIST
– LOCATION OF ALL REVISIONS TO SWPPP
– DATE OF ANNUAL EVALUATION
– NEW TMDLs QUESTION
• DUE JULY 15, 2024
80

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ANNUAL REPORT
"It's simple to use" right… smarts…
• From the Water Board in Sacramento:
– Log into SMARTS
– For the Annual Report you can access it through the Reports link in the main menu.
– Select the Reporting Year and search.
– Click on the Facility Name to open the report interface and then click on the Report ID under the Annual Report heading.
– Answer a few simple questions and certify.
– Including the TMDL questions.
• (LET'S DO ONE NOW…)
81

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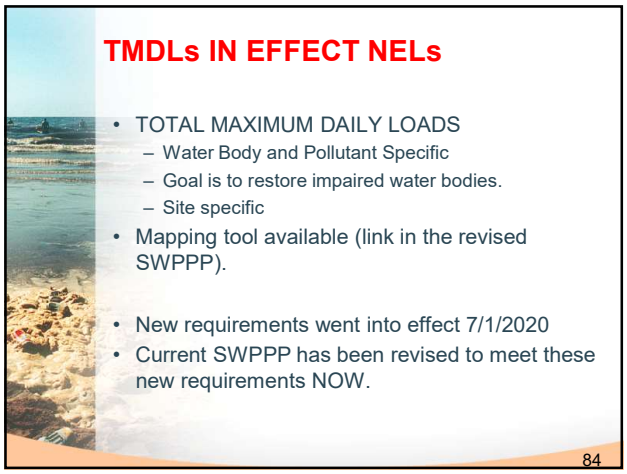
WANT TO BE SCARED??
• EVERYTHING YOU UPLOAD INTO "SMARTS" BECOMES A PUBLIC RECORD AND VIEWABLE BY ANY ENVIRONMENTAL GROUP AND LAWYER.
• NUMBER OF LAWSUITS FILED AGAINST GROUP MEMBERS continue…
82

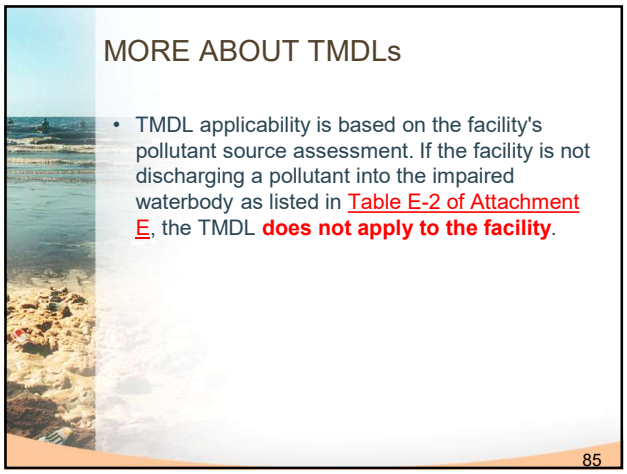
82


"NOT ME"
• Los Angels Water Board has started sending out Notice of Violations (NOV) for not sampling in past reporting years.
– The NOV will come to you via certified mail.
– They want to know why you did not sample and what your corrective action is.
– You need to respond or get fined $10,000 a day.
– They also do not know you belong to a compliance group.
– MAKE SURE YOU RAIN LOG IS KEPT CURRENT
83

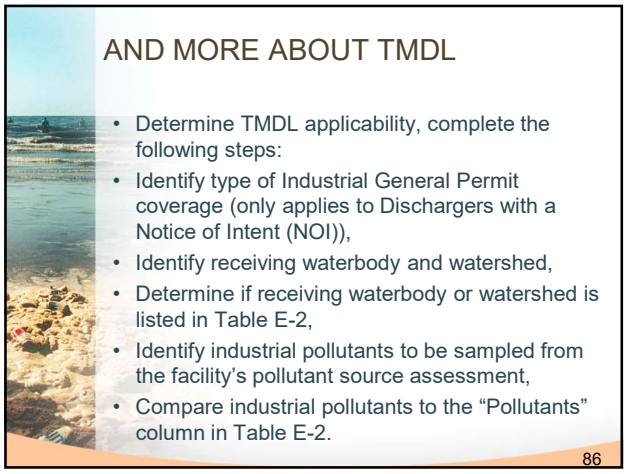
83


TMDLs IN EFFECT NELs
• TOTAL MAXIMUM DAILY LOADS
– Water Body and Pollutant Specific
– Goal is to restore impaired water bodies.
– Site specific
• Mapping tool available (link in the revised SWPPP).
• New requirements went into effect 7/1/2020
• Current SWPPP has been revised to meet these new requirements NOW.
84

84


MORE ABOUT TMDLs
• TMDL applicability is based on the facility's pollutant source assessment. If the facility is not discharging a pollutant into the impaired waterbody as listed in Table E-2 of Attachment E, the TMDL does not apply to the facility.
85

85


AND MORE ABOUT TMDL
• Determine TMDL applicability, complete the following steps:
• Identify type of Industrial General Permit coverage (only applies to Dischargers with a Notice of Intent (NOI)),
• Identify receiving waterbody and watershed,
• Determine if receiving waterbody or watershed is listed in Table E-2,
• Identify industrial pollutants to be sampled from the facility's pollutant source assessment,
• Compare industrial pollutants to the "Pollutants" column in Table E-2.
86

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NEW COMPLIANCE OPTIONS???
• STORM WATER CAPTURE, INFILTRATE, DIVERT, AND/OR EVAPORATE THE RUNOFF?
• DOWNSPOUT FILTERS
• FILTER SOCKS
• FILTRATION SYSTEMS
• LET'S LOOK AT SOME PHOTOS….
87

87

WHY NOT USE THIS FREE WATER!?

- We are using what is called an On-Site Compliance Option to meet the requirements of the General permit. Parts of this are described in (II)(E)(2) and also in Attachment I.
- To calculate the storage volume required, the first hurdle is to figure out the exposed industrial area of the plant. This excludes isolated parking areas, hazardous material areas that are bermed properly (volume-wise), roofs that have no industrial component, etc. For us, the Total sq. footage is 86,373, but removing the excluded areas that drops to 73,270 sq. ft.

88

88

A TALE OF FREE WATER

- Next, find the facility's 85th Percentile, 24-hr Rainfall. It is different in different areas. The L.A. County Hydrology Map site is useful:
- https://dpw.lacounty.gov/wrd/hydrologygis/
- In the top left corner there is a "Layers" tab. Check the "Final 85th Percentile, 24-hr Rainfall".
- In our case, we're a few feet from the 0.90" line. 0.90" is 0.075 feet, times 73,270 sq. ft. is 5,495 cu. ft. Converted to gallons, that is 41,104 gallons.

89

89

FALLING FROM THE SKY

- You might figure "that's it", but a shop needs to be ready to capture another 85th Percentile, 24-hr Rainfall the next day. We don't use water that fast so we need additional storage. We used nearby rainfall data and our daily consumption rate to calculate what capacity we would need. That ended up being close to 100,000 gallons.
- When the storm event exceeds the 85th Percentile, 24-hr Rainfall, you are permitted to discharge. You are still required to sample, but the results are not to be used to determine compliance with the General Permit, just for future rulemaking.

90

90

WATER

- We installed six 15,000 gallon tanks in our boneyard and another 15,000 gallons of storage at the stormwater sump. These 105,000 gallons were put to the test this past season.
- We also burmed areas so industrial stormwater would remain separate from parking areas.
- We've had a stormwater inspection and the inspector walked out impressed. He hadn't seen a storage system like ours.

91

91

FREE WATER?

- Having rainwater in storage has dropped our city water consumption by 2/3rds. Since the rainwater is so much cleaner than city water, we're not using up the ion exchange bottles nearly as often. So we're saving money there too.
- SPECIAL NOTE: BECAREFUL WHAT YOU SAY TO SANITATION…

92

92

TANKS

93

93

TANKS

94

94

Non-Exposure Certification

- Good Luck
  - All the regional waterboards read the same rule BUT each interpret it differently.
    - No exposed industrial processes.
      - NO RACKS, NO TRASH CANs, NO containers/tanks
    - LA & Santa Ana
      - Forklifts driving outside considered
        - » EXPOSURE = NO NEC.
    - San Diego
      - Forklifts stored undercover OK
      - Everything else covered and properly contained with spill kits OK
        - » NEC granted…

95

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DON'T FORGET…….

- **ANNUAL REPORT DUE JULY 15, 2025**

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