Industrial Storm Water: Industrial General Permit (IGP)

Roosevelt Ward, CIH, CSP, QISP

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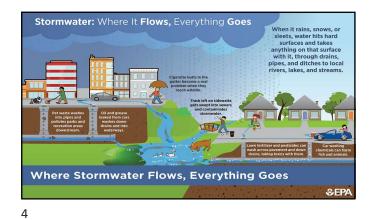
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Storm Water Overview

- Definition: Storm water refers to precipitation that falls onto surfaces such as rooftops, roads, and parking lots and then flows overland or is collected by storm drainage systems.
- Natural Process: Storm water runoff is generated from rain and snowmelt that flows over land or impervious surfaces (e.g., paved streets, parking lots, building rooftops) and does not soak into the ground.
- Environmental Impact: Runoff can pick up pollutants such as oil, grease, trash, chemicals, dirt/sediment into streams, lakes, and groundwater.
- Regulatory Context: Regulatory agencies (e.g., Environmental Protection Agency (EPA), State Water Boards, Department of Toxic Substances Control (DTSC), etc.) have developed stormwater management programs and permits to control and mitigate its impacts.
- Importance of Management: Effective management of stormwater is essential for water quality, minimizing flood hazards, protection of natural environment, and public health and safety.
- Role of Education and Training: Educating individuals and organizations about the importance of stormwater management and providing training on best management practices (BMPs) are key components of addressing storm water pollution.



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Federal – Clean Water Act

- The Federal Clean Water Act (Clean Water Act) prohibits certain discharges of storm water containing pollutants.
- Enacted in 1972 to protect nation's water quality.
- Act prohibits the discharge of pollutants from a point source into "waters of the United States", unless a permit is obtained by the discharger.

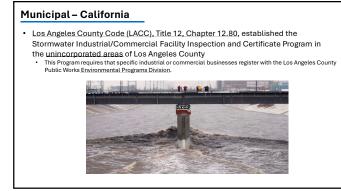


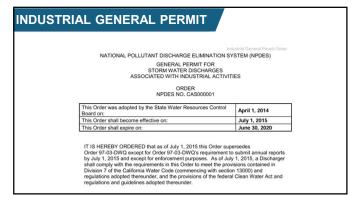
State – California

- The California State Water Resources Control Board (State Water Board) is
 responsible for overall water management and permitting in the state.
- Defines storm water as a "pollutant" and as a "point source" and is subject to permitting under NPDES regulations.









Industrial General Permit (ICP)

Applicability

- Hazardous Waste Treatment, Storage, or Disposal Facilities
- Landfills, Land Application Sites, and Open Dumps
- Steam Electric Power Generating Facilities
- Sewage or Wastewater Treatment Works
- Recycling Facilities
- Oil and Gas/Mining Facilities
- Manufacturing Facilities
- Facilities with Standard Industrial Classifications (SICs) 20XX through 39XX, 4221 through 4225.

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NEC & NONA

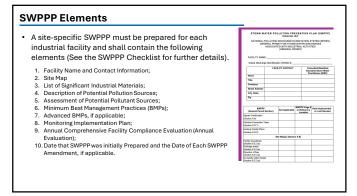
- Conditional Exclusion No Exposure Certification (NEC)
 This General Permit applies U.S. EPA Phase II regulations regarding a conditional exclusion for facilities that have no exposure of industrial activities and materials to storm water (40 CFR § 122.26(g)).
- Notice of Non-Applicability (NONA)
 - Notice of Noti-Applicability (Notice) This General Permit allows industrial facilities to submit a Technical Report in the SMART system claiming either they have designed their facility to contain storm water so that there is no discharge of storm water to waters of the United States or their facility is not hydrologically connected to waters of the United States



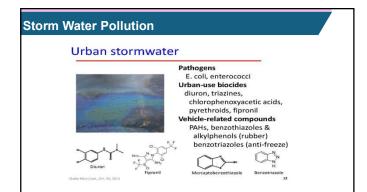


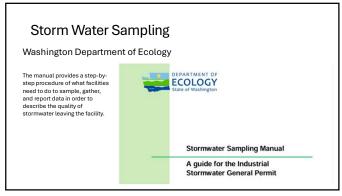


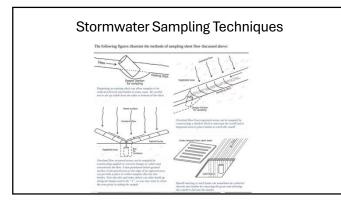


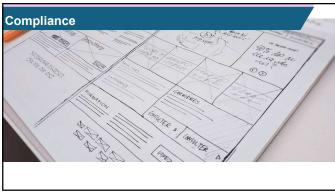














Instantaneous & Average NAL Exceedance

The Discharger shall submit all sampling and analytical results for all individual or Qualified Combined Samples via SMARTS within 30 days of obtaining all results for each sampling event.

Instantaneous maximum NAL exceedance: An instantaneous exceedance occurs when two more analytical results from samples taken any single parameter within a reporting year exceed the instantaneous maximum NAL va

Average: The Discharger shall determine the average concentration for each parameter a compare the average concentration for each parameter to the corresponding annual NAL values in Table 2.

Suspended Solids (TSS)*, Total	5M 2540-D	mgit	100	1
OI & Grease (O&G)*, Total		not		2
Zinc, Total (H)	EPA 200.8	ngt	0.26**	
Copper, Total (H)	EPA 200.8	ngt	0.0332**	_
Cyanide, Total	SM 4500-CN C. D. or E	ngi	0.022	٦.
Load, Total (H)	EPA 200.8	ngt	0.262**	
Chemical Oxygen Demand (COD)	SM 5220C	ngt	120	
Aluminum, Total	EPA 200.8	ngt	0.75	_
Iron, Yotai	EPA 200.7	ngt	1.0	-
Nitrate + Nitrite Nitrogen	SM 4500-NO3- E	mg1.as	0.68	
Total Phosphorus	SM 4500-P 8+E	P mgt as	2.0	
Ammonia (as N)	SM 4500-NH3 B+ C or E	ngt	2.14	
Magnesium, total	EPA 200.7	ngt	0.064	
Arsenic, Total (c)	EPA 200.8	ngt	0.15	
Cadmium, Total (H)	EPA 200.8	ngi	0.0053**	
Nickel, Total (H)	EPA 200.8	ngt	1.02**	-
Mercury, Total	EPA 245.1	mgit	0.0014	
Selenium, Total	EPA 200.8	100	0.005	-
Silver, Total (H)	EPA 200.8	mat	0.0183**	_
	Lead Strates (CMS), 154 Oct. Start (CMS),	104 December 104/DC 1988 Physics 104/DC Physics 104/DC P	104 (1) (2) (2) (2) (2) (2) (2) (2) (2) (2) (2	Loss Construction Construction <thconstruction< th=""> Construction</thconstruction<>

TABLE 2: Parameter NAL Values, Test Methods, and Reporting Units PARAMETER TEST METHOD BERGEN AWAUAL NAL 1 INFT See Section pH units NA L XI.C.2

mol 100

NSTANTA NEOUS MAXXMUM NAL Less than 6.0 Greater than 9.0 400

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Annual Reporting

- Industrial Storm Water General Permit Annual Report:
- Dischargers are required to certify & submit an Annual Report no later than July 15 following each reporting year via the Stormwater Multiple Application and Report Tracking System (SMARTS).
- The Annual Report:
- Is a list of questions for the discharger to complete, which demonstrates compliance with all applicable requirements of the Industrial Storm Water General Permit (IGP).
- Requires an explanation for any non-compliance of requirements during the reporting year, and certification that the Annual Comprehensive Facility Compliance Evaluation (Annual Evaluation) was completed.
- May be entered by any SMARTS user linked to the facility, but may only be certified
 and submitted by the Legally Responsible Person / Duly Authorized Representative.

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Level I & II ERA

Exceedance Response Actions (ERA) This General Permit requires Dischargers to develop and implement ERAs, when an annual NAL or instantaneous maximum NAL exceedance occurs during a reporting year.

Level I -

The first time an annual NAL or instantaneous maximum NAL exceedance occurs for any one parameter, a Discharger's status is changed from Baseline to Level 1 status, and the Discharger is required to evaluate and revise. as necessary, its BMPs (with the assistance of a QISP) and submit a report prepared by a QISP.

Level II -

The second time an annual NAL or instantaneous maximum NAL exceedance occurs for the same parameter in a subsequent reporting year, the Discharger's status is changed from Level 1 to Level 2 status, and Dischargers are required to submit a Level 2 ERA Action Plan and a Level 2 ERA Technical

Qualified Industrial Storm Water Practitioner (QISP)

- Qualified Industrial Stormwater Practioner (QISP)
 Dischargers must designate a Qualified Industrial Storm Water Practitioner (QISP) for each facility that has entered <u>Level 1 status</u> in the Exceedance Response Action (ERA) process as described in the General Permit.
 Completion of a State Water Board-sponsored or approved training course is required for qualification
 A competency exam may be required by the Water Board to assess understanding

A QISP must:
 A Sist the Discharger in fulfilling Level 1 & 2 ERA requirements outlined in Section XII
 Assist new Dischargers discharging into impaired water body with a 303(d) listed
 impairments by demonstrating eligibility for coverage through preparing the data.

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Benefits of Storm Water Compliance

- Improved Water Quality:
 Proper stormwater management helps reduce pollutants entering water bodies, protecting aquatic ecosystems and ensuring cleaner water for communities. Increase Water Supply:
- Capturing and reusing stormwater can augment local water supplies, which is particularly valuable in drought prone areas.
- Enhanced Public Spaces: Implementing green infrastructure for stormwater management can create more recreational spaces and increase urban green areas.
- Habitat Creation:
- · Stormwater projects can enhance stream and riparian habitats, supporting biodiversity. Community Resilience:
- Effective stormwater management helps mitigate flood risks and can improve air quality, contributing to overall community resilience against climate change.

Negative Impacts of Non-Compliance

- Public Health Risks:
- Bacterial and viral infections, drinking water contamination, bio amplification in aquatic wildlife. Effective stormwater management reduces the contamination of drinking water sources, and cost of treatment. Improved Water Quality:
 Proper stormwater management helps reduce pollutants entering water bodies, protecting aquatic ecosystems and ensuring cleaner water for communities.
- Degradation of Waterway Quality
 Sediment build-up, removal of trees and vegetation (buffers) along waterways, sewage discharges, petroleum discharges and splits, activation and transportation of pollutants. Clean water bodies support healthy fish populations, which is vita for both commercial and recreational fishing industries.
- Economic Impact:
 Properties near clean and well-maintained water bodies tend to have higher values. Fordertes real can and wermanianter water bodies tend to have ingoet values.
 Enhanced Public Spaces/Water Recreation:
 Activities such as swimming, boating, and kayaking rely on clean and safe water. Good stormwater management can boost local tourism and community well-being.
- Violations | Fines | Negative PR

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