

Assessing NOI Facilities

The Good the Bad and the Ugly

Stormwater Inspector Training
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Overview

- Review of Stormwater Permits
- The Present Situation
 - The Good the Bad and the Ugly
- How to meet our requirements
 - Stormwater Inspection Form
 - How to obtain information
- Changes coming
 - State Draft Industrial General Permit

State General Industrial Permit

- Notice of Intent - NOI
- Storm Water Pollution Prevention Plan - SWPPP
 - Pollutant Sources Identified
 - Best Management Practices - BMPs
- Monitoring Plan
- Annual Reports

Municipal Regional Permit

- Inspect NOI facilities
- Document
 - SWPPP present
 - BMP's properly implemented and maintained
- Check Monitoring Data
 - No polluted discharge left the site
- Enforce
 - Municipal code
- Notify Water Board of sites not filing NOI

Industrial Facilities -The Good

- SWPPP
- Monitoring Plans
- Annual Report and Evaluations

SWPPP

- Maps
- List of Potential Pollutant Sources
- BMP's
- Identified personnel

Monitoring Plan

- Inspections
- Sampling

Annual Evaluation and Report

- Monitoring results
- Compare with benchmark values
- SWPPP Updates

Industrial Facilities - The Bad

- SWPPP and Monitoring Plan often prepared by those not implementing the program
- Monitoring parameters not understood
- BMP's not updated
- Annual Evaluation and Report often lacking information

Industrial – The Ugly

- SWPPP and Monitoring plan inadequate
- Monitoring not supporting source identification
- Difficulty in obtaining documents
- Inspections by Water Board staff and EPA auditors not coordinated

Inspection Form

Stormwater Permit Status

- Facility has filed NOI WDID #
 - Does the Facility have a SWPPP
 - Is the SWPPP being implemented?
 - Is self monitoring being implemented?
 - Has the facility self-certified no exposure?
- Facility is not covered and does not appear to need coverage
- Facility not covered but may require coverage
- Facility has an individual NPDES permit
 - Permit #

Facility has filed NOI

- List of Filers on Water Board website
www.waterboards.ca.gov/water_issues/programs/stormwater/gen_indu
- WDID #

Facility is not covered

- Facility is not covered and does not appear to need coverage
 - List of regulated Standard Industrial Classification
 - Commercial facilities do not need coverage
- Facility not covered but may require coverage
- Facility has an individual NPDES permit
 - Permit #

NOI facilities

- Does the Facility have a SWPPP?
 - Required to be onsite
 - Request the SWPPP be present for inspection
- Is the SWPPP being implemented?
 - Understand BMP's
- Is self monitoring being implemented?
 - Review annual reports and sampling data on website
 - Request Annual report monitoring results be present
- Has the facility self-certified no exposure?
 - Request documentation from State be present

Are the BMP's being implemented

- Good - table to pull out
- Bad - narrative descriptions
- Ugly - information too general

- Inspection form
 - BMP's in place
 - Appear effective

Draft Industrial General Permit

- Electronic filing of registration documents, annual reports and SWPPP
- SWPPP checklist
- Minimum BMP's and examples
- Pollutant Source inspections
- BMP descriptions

Draft Industrial General Permit

- Sample results in SMARTS within 30 days
- Group Monitoring removed
- Qualified SWPPP practitioner
- Sample collection and handling instruction
- No exposure and no discharge exclusions

Summary of Suggestions

- Utilize Water Board website
- Request documents not available on website be present for inspection
- Look for BMP table and maps in SWPPP
- Use inspection form for BMP's if SWPPP not user friendly
- Keep up on state general permit adoption