OVERVIEW OF THE

California SWRCB's NPDES Industrial General Permit

The SWRCB adopted the latest version of the NPDES General Permit for Stormwater Discharges Associated with Industrial Activities on 1 April 2014. The Industrial General Permit (IGP) became effective on 1 July 2015. An amendment to the IGP was adopted on 6 November 2018 and became effective on 1 July 2020. This fact sheet summarizes the monitoring and compliance requirements in the IGP.

WHO IS COVERED?

Coverage is determined by the facility's SIC Code [1]. If the IGP applies to a facility, the facility must obtain permit coverage by submitting a NOI with PRDs online via SMARTS (with some exceptions). PRDs include the NOI, site map, facility SWPPP and SWPPP checklist [2], and annual fee. Once permit coverage is obtained, the IGP requires specific documents, reports, and laboratory analytical results to be uploaded into the SMARTS. This information is accessible to the public.

VISUAL MONITORING

Visual observations of BMPs and drainage areas are required monthly and during each sampling event to check the functionality of the BMPs and to identify any unauthorized non-stormwater discharges. All visual observations must be recorded and included in the Annual Report to be completed and submitted via SMARTS.

SAMPLING AND ANALYSIS

Stormwater samples are to be collected at all locations that discharge stormwater during two QSEs within the first half of each reporting year (July 1 to December 31) and two QSEs within the second half of each reporting year (January 1 to June 30).

Samples shall be collected from each drainage location within the first four (4) hours of: 1) the start of discharge, OR 2) the start of facility operations when the QSE occurs within the previous 12 hours. All samples must be analyzed for TSS, pH, and oil & grease. Additional parameters may be required for analysis based on the SIC code of the facility and receiving waterbody requirements. The discharger must submit all sampling and analysis results via SMARTS within 30 days of obtaining all results for each sampling event.

Some dischargers may be eligible for Representative Sampling Reduction to reduce the number of locations sampled in each drainage area.

POLLUTANT SOURCE ASSESSMENT

A narrative assessment of potential pollutant sources must be included in the SWPPP. This assessment is critical, as the findings will help determine which pollutants the facility must monitor and can inform areas of no exposure.

NUMERIC ACTION LEVELS

An exceedance of a numeric action level is not a permit violation. The IGP includes three types of NALs:

- Annual NALs apply when the analytical results from all samples taken during a reporting year are averaged for each parameter and the averaged value exceeds the associated NAL [3].
- Instantaneous maximum NALs apply when two or more analytical results for TSS, pH or oil & grease from samples taken within a reporting year exceed the instantaneous maximum NAL for that parameter [3].
- TNALs may be applicable if the facility is a Responsible Discharger. TNALs are functionally instantaneous maximum NALs but the values are based on TMDLs [4].

NUMERIC EFFLUENT LIMITATIONS

An exceedance of an NEL is a violation of the IGP. NELs may be applicable if the facility is a Responsible Discharger, and apply when two or more analytical results for a parameter from samples taken within a reporting year exceed the NEL value listed in the TMDL Compliance Table in Attachment E.

EXCEEDANCE RESPONSE ACTIONS

If a numeric action level is exceeded, the discharger is moved to a higher compliance status for the next compliance year, beginning July 1.

- If the facility's current status is Baseline, they move to Level 1 Compliance Status. The discharger must designate a QISP and is required to evaluate their SWPPP and implement BMP changes by August 30. A Level 1 ERA Report must be prepared by the QISP and submitted by January 1.
- If the same parameter is exceeded in a subsequent year, the discharger is moved from Level 1 to Level 2 Compliance Status and must submit an ERA Technical Report. This type of report must be prepared and stamped by a registered California Licensed Professional Engineer.

A facility may be in different Compliance Statuses for different parameters.

[1] See Table 1 of the IGP

[2] See Appendix 1 of the IGP

[3] See Table 2 of the IGP

[4] See Attachment E of the IGP

DEFINITION OF TERMS

The following terms are used in this fact sheet.

Amendment: adopted on 6 November 2018, effective on 1 July 2020

BMPs: Best Management Practices

CBPELSG: CA Board for Professional Engineers, Land Surveyors and Geologists

ERA: Exceedance Response Action

IGP: Industrial General Permit adopted on 1 April 2014, effective on July 1, 2015

NAL: Numeric Action Level

NEC: No Exposure Certification

NEL: Numeric Effluent Limitation

NOI: Notice of Intent

NONA: Notice of Non-Applicability

PRDs: Permit Registration Documents

QISP: Qualified Industrial Stormwater Practitioner

QSE: Qualifying Storm Event; a rainfall event that 1) produces a discharge in at least one drainage area, AND 2) was preceded by 48 hours or more of dry weather.

Reporting year: July 1 through June 30

Responsible Discharger: Discharger with NOI coverage under IGP who discharges to impaired waterbody identified in a USEPA approved TMDL with a waste load allocation assigned to industrial stormwater sources

RWQCB: Regional Water Quality Control Board

SIC: Standard Industrial Classification

SMARTS: Stormwater Multiple Application and Report Tracking System

SWPPP: Stormwater Pollution Prevention Plan

SWRCB: State Water Resources Control Board

TSS: Total Suspended Solids

TMDL: Total Maximum Daily Load

TNAL: TMDL Numeric Action Level

USEPA: United States Environmental Protection Agency

IMPORTANT DATES

1 July 2015: the IGP became effective

1 July (annually): compliance year begins

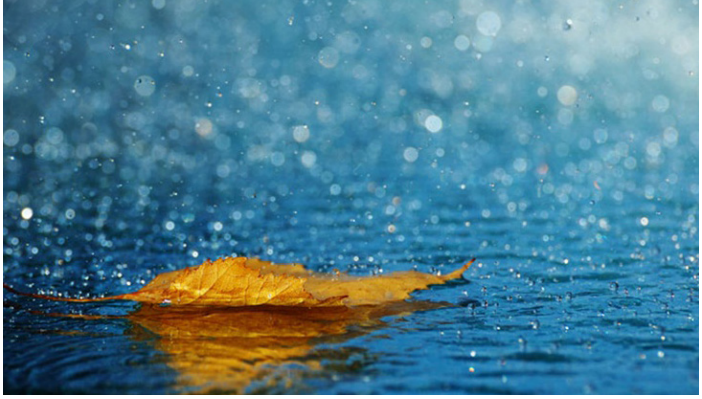
30 June (annually): compliance year ends

Annually, as needed

- **30 August:** evaluate and update SWPPP and implement BMP changes
- **1 January:** Submit Level 1 or Level 2 ERA Report

6 November 2018: IGP Amendment adopted

1 July 2020: IGP Amendment become effective



TMDLS

In 2014, the SWRCB adopted the IGP without specific TMDL values to avoid a delay in adopting of the IGP. TMDLs were incorporated in an amendment adopted on 6 November 2018, which became effective on 1 July 2020. If a facility is a Responsible Discharger, the TMDL-related requirements in the amendment will apply. Stormwater data collected for the facility must be compared to TNALs and NELs presented in the revised Attachment E, as applicable. For more information, visit the SWRCB website or visit the KJ Stormwater Blog: www.kennedyjenks.com/2018/12/04/igp-amendment-adopted/

MINIMUM BEST MANAGEMENT PRACTICES

The IGP requires a set of minimum BMPs required to be implemented (with rare exceptions), including spill and leak prevention response, erosion and sediment controls, and employee training [5]. The IGP also requires a set of Advanced BMPs, which are generally structural BMPs that must be implemented if the minimum BMPs are deemed inadequate based on exceedance response actions [6].

QUALIFIED INDUSTRIAL STORMWATER PRACTITIONER

If a facility has reached Level 1 Compliance Status in the ERA process, the discharger is required to designate a QISP who must complete a SWRCB-sponsored QISP training course, register with SMARTS, and obtain a QISP identification number. A QISP can represent either one facility or multiple facilities but must be able to perform the functions required by the permit at all times. Specific tasks that require a QISP include: Level 1 ERA Evaluation and Report, Level 2 ERA Action Plan and Technical Report, and a Level 2 ERA Extension.

[5] See Section X.H.1 of the IGP

[6] See Section X.H.2 of the IGP

ADDITIONAL INFORMATION

If you have questions or would like assistance in meeting the requirements of the IGP, please contact **Katie McCoy** at (916) 858-2767 or **Margaret Wild** at (415) 243-2527.

Visit the Kennedy/Jenks Stormwater Blog and sign up to receive updates at: www.kennedyjenks.com/category/stormwater

The IGP and IGP Amendment is available on-line at: www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.htm