

2014 Final Draft Industrial General Permit

For nearly two decades, the State Water Resources Control Board (State Water Board) has regulated the runoff and treatment of storm water from industrial, construction and municipal sources in California. The State Water Board is required to issue permits that are consistent with the National Pollutant Discharge Elimination System (NPDES) storm water regulations adopted by the US Environmental Protection Agency (US EPA) in accordance with the federal Clean Water Act.

Industrial General Permit

The Industrial General Permit (IGP) is a statewide, general NPDES permit that regulates the discharge of storm water associated with industrial activity as defined by the US EPA. Storm water and urban runoff are significant sources of water pollution and can threaten aquatic life and public health.

Background of the Industrial General Permit

The management of storm water at industrial sites is currently regulated under a permit issued in 1997. This permit was originally scheduled for reissue in 2002, but after two drafts were released and commented upon in 2003 and 2005, the State Water Board delayed further action in response to debates over how to update the permit and to allow an expert panel to advise the State Water Board on the role of numeric effluent limitations (NELs) in storm water permits. The renewal process was further delayed as staff was directed to complete revision of the Construction General Permit and to assist in the development of a new electronic reporting system called SMARTS.

The most recent efforts to reissue the IGP occurred with the release of the July 19, 2013, draft permit. Based up the comments received and subsequent meetings with key stakeholders on the July 2013 draft, staff identified several areas of the 2013 draft IGP that could be clarified to reduce confusion and complexity in permit requirements, while retaining the goal of achieving permit compliance for most dischargers within the five-year permit cycle.

Specific clarifying changes to this final draft include:

- **No Exposure Certification (NEC) Enrollment Schedule Modified from July 1, 2015 to October 1, 2015:** Thousands of dischargers will be registering for the IGP simultaneously and the change to the NEC coverage registration date will stagger the workload on the storm water help desk and permit staff to implement this registration process. Storm water staff also assumes this will provide better assistance to dischargers registering for coverage.
- **303(d) Impairments List Added – Appendix 3:** Many comments were received asking for clarification on how and when a discharger would monitor for 303(d) impairments. Staff has added an Appendix 3, which is a list of these impaired water bodies and their pollutant information in the attempts to provide this information to the dischargers.

- **Revised Definition of Plastic Materials:** The 2013 draft IGP includes certain Best Management Practices for facilities handling preproduction plastics (implementation of AB 258). This definition of “Plastic Materials” has been modified to provide clarity on the types of preproduction plastics that may require additional permit requirements.
- **Temporary Suspension of Industrial Activities Language Clarified:** The 2013 draft IGP allows dischargers to temporarily suspend monitoring of industrial activities if they provide a justification, details of the suspension and Best Management Practices to be implemented in relation to the suspension. The reporting requirement language has been clarified, as has the language describing what monitoring activities dischargers would not be required to comply with during the suspension.
- **Clarification on Sampling and the Application to Numeric Action Levels (NAL) Exceedances Prior to Level 2 ERA:** The 2013 draft IGP requires dischargers to sample their storm water effluent and compare the results to NALs (sampling exceedance triggers). If a discharger exceeds a NAL as specified in the permit, The discharger has to implement various corrective actions called Exceedance Response Actions (ERA). There are two levels of these actions: Level 1 ERA (site evaluation and report by a Qualified Industrial Storm Water Practitioner) and Level 2 ERA (technical report by a Qualified Industrial Storm Water Practitioner, non-industrial or background considerations and possible treatment).

The language was unclear with how a discharger transitions from Level 1 ERAs to Level 2 ERAs for a parameter. A “grace period” has been added that allows dischargers some time before sampling results for the parameter that they are implementing Level 1 ERAs for is used in the calculations to determine if the discharger goes to Level 2.

Next Steps

The Water Board has scheduled an April 1 adoption meeting for the IGP. The comment period ends at noon on March 4. After the conclusion of the comment period, staff will review and summarize comments received, and work with State Water Board management to determine what revisions should be considered to include before the adoption meeting.

The **2014 Final Draft NPDES Industrial General Permit Notice** and associated documents may be [viewed and downloaded](#) from the State Water Board’s website.

(This fact sheet was last updated February 18, 2014)