Draft Industrial General Permit Packet and Summary of Changes This Permit Packet contains the following documents

Summary of Changes Document **Corrective Actions Schematic** Fact Sheet Order Attachment A – Facilities Covered Attachment B - No Discharge Certification -Conditional Exclusion Attachment C - No Exposure Certification -Conditional Exclusion Attachment D - Storm Water Sample Collection and Handling Instructions Attachment E – Storm Water Pollution **Prevention Plan Checklist** Attachment F – 303(d) Listing Receiving Waters Attachment G – TMDL Implementation Attachment H – Sub Chapter N – Federal Requirements: Attachment I – Hardness Determination Attachment J - Acronyms Attachment K - Glossary

Major Changes/New Requirements in the Draft Industrial General Permit

Item #	New Requirement	Reference
1.	Numeric Action Limits and Numeric Effluent Limits: Permit incorporates USEPA benchmark values as NALs. When NALs are exceeded in accordance with the corrective action triggers defined in XV(D), corrective action are required. Dischargers who repeatedly exceed NALs eventually are subject to NELs. The NELs are the same values as the NALs unless the Regional Boards impose a more stringent water quality based value.	Page 14-15 V(C & D) and page 34 Table 4
2.	Compliance Storm Event: Permit establishes 10 year, 24 hour compliance storm event for the discharge of Total Suspended Solids (TSS) and for any treatment related BMP.	Page 15 V(E)(3)
3.	Daily Average: Two of the three Corrective action triggers (see XVI(D) are based upon the daily average of all samples collected and analyzed.	V(E)(4)
4.	Electronic Filing Requirements: Permit requires all dischargers to electronically file Permit Registration Documents (PRDs) into SMARTS. All other reports required in this Permit are also required to be electronically filed into SMARTS.	Page 11 II.P-II.S
5.	QSD/QSP: Similar to construction permit, permit requires dischargers to meet minimum training qualifications and certification.	Pages 15-16 VII
6.	* SWPPP Checklist : Upon Completing the facility's SWPPP, the discharger shall prepare the SWPPP Checklist.	Page 18, VIII (D)(1) & Attachment E
7.	 *Minimum BMPs: Dischargers shall implement specific minimum BMPs throughout their facilities unless clearly inapplicable. Specific minimum BMPs are included for the following categories: Good Housekeeping, Preventative Maintenance, Spill Response Procedures, Material Handling/Waste Management, Employee Training, 	Pages 22-26 VIII.H.1.a-h
	 Record Keeping and Quality Assurance, Erosion/Sediment Control, Periodic Visual Inspections, and 	Page 1 of 5

Major Changes/New Requirements in the Draft Industrial General Permit

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	Additional facility specific BMPs.	
	 A few examples of specific minimum BMPs included in the Draft Industrial General Permit include: Inspect all outdoor areas weekly associated with industrial activity, storm water discharge locations, drainage areas, conveyance systems, waste handling/disposal areas, and perimeter areas impacted by off-facility materials or storm water run-on. Divert storm water or authorized non-storm water flows from non-industrial areas from contact with industrial areas of facility. Flows from non-industrial areas that contact industrial areas of the facility are subject to General Permit requirements. 	
8.	 *Pollutant Source Inspections: Dischargers shall: Conduct a minimum of four quarterly visual inspections of all areas of industrial activity and associated potential pollutant sources. The annual comprehensive facility compliance evaluation may substitute for one of the quarterly inspections. Implement any corrective actions and/or SWPPP revisions resulting from inspection. Prepare a summary and status of the corrective actions and SWPPP revisions resulting from the quarterly inspections. Certify in Annual Report that each quarterly visual inspection was completed. 	Page 26 VIII.H.1.h
9.	 *BMP Descriptions: The SWPPP shall include a narrative description of each BMP implemented at the facility that includes: Type of pollutant the BMP is designed to prevent; frequency, time(s) of day, or conditions when BMP is scheduled for implementation; location within each area of industrial activity or industrial pollutant source where BMP shall be implemented; identification of the individual and/or position responsible for implementing the BMP; the procedures and/or instructions to implement the BMP; and the equipment and tools necessary to implement the BMP. 	Pages 26-27 VIII.H.3
10.	*Containment Inspections: At least once a month, dischargers shall visually observe any storm water storage and containment areas to detect leaks and ensure maintenance of adequate freeboard.	Page 29 IX.C.4

Major Changes/New Requirements in the Draft Industrial General Permit

*Ineligible Storm Events: Prior to completing each wet season monthly visual observation,	Page 30 IX.C.5
	17.0.0
*Pre-storm Inspections: Prior to anticipated storm events, dischargers shall visually observe all	Page 30
	IX.C.6
Sample Frequency Requirements: Standard sampling frequency increased to first eligible storm	Pages 30
event per quarter. Dischargers subject to Level 2 corrective actions sample two eligible storms per quarter. Dischargers subject to Level 3 shall sample every eligible storm event	X.A-X.D
	Page 30-31
	X.E-X.F
preceded by two days of dry weather. Dry weather is defined as two days where less than 1/8 th	
inch of rainfall has occurred.	
	Page 31
Parameters indicating the presence of pollutants identified in the pollutant source assessment required for the SWPPP.	X.H.2 and X.H.4
4. Parameters indicating the presence of pollutants that may be causing or contributing to an	
existing exceedance of a WQS in the facility's receiving water.	
*Field Measurements: Measurements for pH and electrical conductivity must be made in the filed	Page 32
	X.K
Sample Reporting: Dischargers must submit analytical results into SMARTS within 30 days of obtaining results.	Page 32 XI
Corrective Actions: When analytical results meet any of three NAL corrective action trigger	Pages 38-43
	XVII
the triggers have been met.	
First year a trigger is met - Level 1 Corrective Actions – Operational Source Controls	
Second year a trigger is met – Level 2 Corrective actions – Structural and/or Treatment	
	dischargers shall record any storm event that occurred of less than ¼ of an inch or more than ¼ of an inch during operating hours that did not produce a discharge. *Pre-storm Inspections: Prior to anticipated storm events, dischargers shall visually observe all storm water drainage areas during operating hours to identify any spills, leaks, or uncontrolled pollutant sources and implement appropriate corrective actions. Sample Frequency Requirements: Standard sampling frequency increased to first eligible storm event per quarter. Dischargers subject to Level 2 corrective actions sample two eligible storms per quarter. Dischargers subject to Level 3 shall sample every eligible storm event. Qualified Storm Event: A qualified storm event is a storm event that (1) is producing a storm water discharge during facility operating hours, (2) has produced ¼" or more of rainfall, and (3) was preceded by two days of dry weather. Dry weather is defined as two days where less than 1/8 th inch of rainfall has occurred. *Sampling Parameter Selection: Dischargers shall analyze samples for:

	Controls	
	Third year a trigger is met – Level 3 Corrective Actions – Imposition of Numeric Effluent Limits	
19.	Facilities With Significant Land Disturbances: Facilities in the Mining and Quarrying category, Metal Mining category, and landfills, land application sites, and open dumps shall collect samples on all days of an eligible storm event.	Pages 36-37 XIII
20.	Qualified Combined Samples: Dischargers shall collect samples from all drainage areas. Dischargers may analyze each sample collected, or may analyze a combined sample consisting of equal volumes of samples collected from as many as three drainage areas. Samples must be combined by laboratory. Does not apply to pH and specific conductance.	Page 35 XII.B
21.	*Storm Water Sample Collection and Handling Instructions	ATTACHMENT E
22	Annual Reporting Requirements : Annual reports shall be electronically submitted using SMARTS. Proposed submittal date changed to July 15 of each year.	Page 43-44 XX
23.	*Table 4– Parameter Benchmark Values, Test Methods, Detection Limits, and Reporting Units	Pages 34
24.	Group Monitoring Removed. All dischargers required to have a QSP and QSD	
25.	Conditional Exclusion Requirements - No Exposure Certification In accordance with the Phase II regulations, this General Permit requires all dischargers who operate facilities described in Attachment 1 of the General Permit to submit either an NOI for coverage under the General Permit, or a No Exposure Certification (NEC) certifying that there are no industrial activities exposed to storm water at the facility. Unlike the Federal NEC requirements, this General Permit requires annual evaluation and renewal of the NEC, if still applicable. Dischargers must electronically file a No Exposure Conditional Exclusion Certification, recertify annually, and pay an annual fee.	Pages 44-47 XXI.
26.	Conditional Exclusion - No Discharge Certification This General Permit includes a new conditional exclusion for dischargers that have facilities that can meet containment of storm water for a 100 year, 24 hour storm event. Dischargers must electronically file a No Discharge Conditional Exclusion certification, recertify annually, and pay an annual fee.	Page 47-48 XXI

improvements that satisfy future adopted State Board approved G-SIRT standards to apply for conditional exclusion to the SWPPP and monitoring requirements of this General Permit.
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