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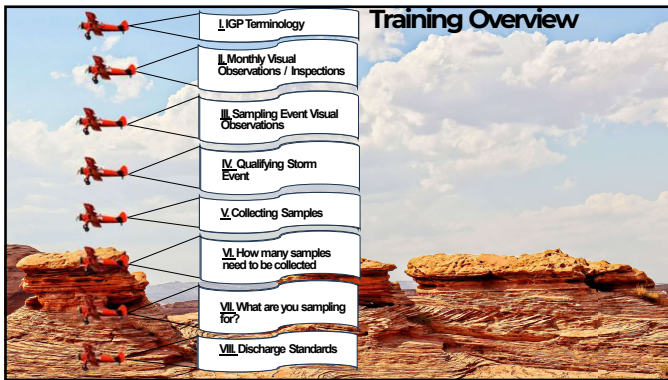
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## I. IGP Terminology

**Discharge**

A discharge of storm water or non-storm water occurs when it flows off a facility or flows into a conveyance system (storm drain, swale) that flows off site.

**Point of Discharge (A.K.A Outfall)**

The point(s) at which storm water or non-storm water leaves a facility or enters a storm drain that flows, uncontained off of a facility.

**Impoundment/Contained**

The holding, containing, or storing of storm water prior to discharge, as in a detention pond, sump, or vault

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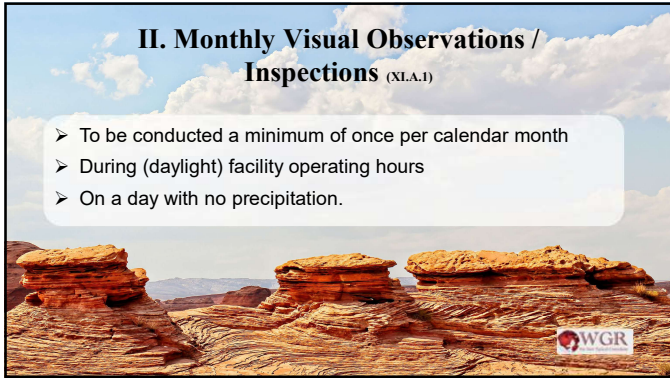
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## II. Monthly Visual Observations / Inspections (XI.A.1)

- To be conducted a minimum of once per calendar month
- During (daylight) facility operating hours
- On a day with no precipitation.



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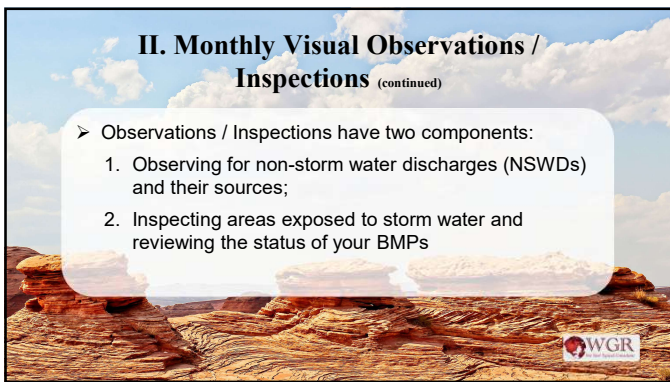
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## II. Monthly Visual Observations / Inspections (continued)

- Observations / Inspections have two components:
  1. Observing for non-storm water discharges (NSWDs) and their sources;
  2. Inspecting areas exposed to storm water and reviewing the status of your BMPs



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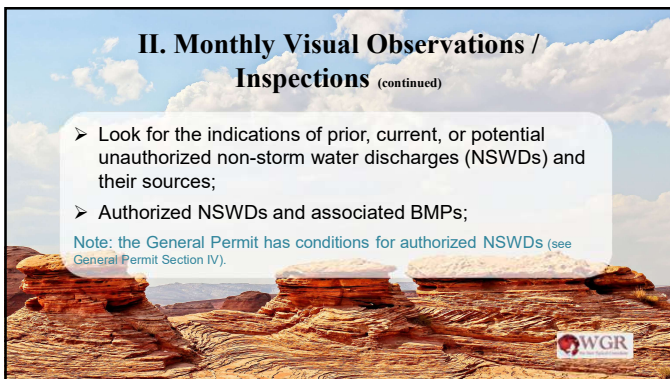
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## II. Monthly Visual Observations / Inspections (continued)

- Look for the indications of prior, current, or potential unauthorized non-storm water discharges (NSWDs) and their sources;
- Authorized NSWDs and associated BMPs;

Note: the General Permit has conditions for authorized NSWDs (see General Permit Section IV).



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## II. Monthly Visual Observations / Inspections (continued)

➤ Inspect Outdoor industrial equipment and storage areas, outdoor industrial activities areas, BMPs, and any other potential source of industrial pollutants.



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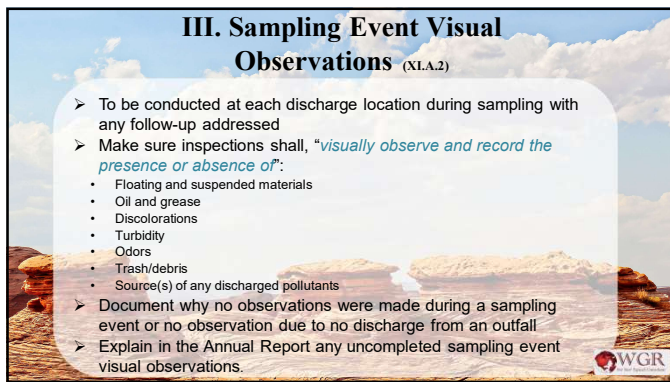
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## III. Sampling Event Visual Observations (XII.A.2)

➤ To be conducted at each discharge location during sampling with any follow-up addressed

➤ Make sure inspections shall, "*visually observe and record the presence or absence of*":

- Floating and suspended materials
- Oil and grease
- Discolorations
- Turbidity
- Odors
- Trash/debris
- Source(s) of any discharged pollutants

➤ Document why no observations were made during a sampling event or no observation due to no discharge from an outfall

➤ Explain in the Annual Report any uncompleted sampling event visual observations.



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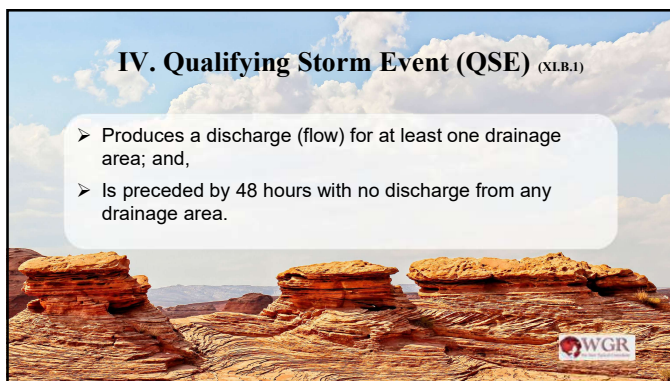
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## IV. Qualifying Storm Event (QSE) (XII.B.1)

➤ Produces a discharge (flow) for at least one drainage area; and,

➤ Is preceded by 48 hours with no discharge from any drainage area.



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#### IV. Qualifying Storm Event (QSE) (continued)

**You only need to sample if there is a discharge. If there is no discharge, sampling is not required!**



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#### V. Collecting Samples (XI.B.5)

- Required to be collected from a QSE
- Required to be conducted within four (4) hours of the start of discharge during a facility's scheduled operating hours (as defined in Attachment C)
- May be collected within four (4) hours of the start of facility operations if the QSE occurs within the previous 12-hour period



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#### V. Collecting Samples (continued)

- Not required during dangerous weather conditions (see General Permit Section XI.C.6.a.i)

Note: A sample may be collected during a QSE outside scheduled operating hours, but it is not required (see General Permit Section XI.C.6.a.ii).



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## VI. How many samples need to be collected

(XLB 2)

- Two (2) QSEs within first half of the reporting year (July 1-Dec 31), and two (2) QSEs within second half of the reporting year (Jan 1-June 30)
- Compliance Group Participants are only required to collect and analyze storm water samples from one (1) QSE within the first half of each reporting year (July 1 to December 31) and one (1) QSE within the second half of the reporting year (January 1 to June 30).



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## VI. How many samples need to be collected

(continued)

- According to the General Permit Fact Sheet Section II.J.1, if four (4) QSEs did not occur during a storm water monitoring year, a discharger is not required to make up the sampling events in subsequent reporting years.



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## VII. What are you sampling for?

**Under the Industrial General Storm Water Permit, there are three sampling constituents that all facilities must analyze in storm water discharges.**



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**VII. What are you sampling for?** (continued)

pH  
 A numeric measurement of the hydrogen ion concentration. The neutral range is usually considered to be 6.0 to 9.0. At values less than 6.0 the water is considered acidic; above 9.0 it is considered alkaline or basic. I have found that pure rainfall tends to be a pH of a little less than 7. Many industrial facilities handle material that can affect pH.  
**Must be tested within 15 minutes!**



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**VII. What are you sampling for?** (continued)

Total Suspended Solids (TSS)  
 An indicator of the un-dissolved solids that are present in storm water discharges. Sources of TSS include sediment from erosion and dirt from impervious (paved areas). Because many pollutants can adhere to sediment particles, reducing sediment can reduce the amount of these pollutants in storm water discharge.



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**VII. What are you sampling for?** (continued)

Oil and Grease  
 The constituent oil and grease is just that... oil and grease. Analysis for oil and grease measures the of the amount of oil and grease present in a storm water discharge. At very low concentrations, O&G can adversely affect aquatic life, create unsightly floating material and make water undrinkable. Sources of oil and grease include maintenance shops, vehicles, machines and roadways.



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### VII. What are you sampling for? (continued)

The General Permit also requires that facilities must :

1. Sample for constituents that are listed in Table 1
2. Sample for any potential pollutants that might likely be present in storm water from your industrial activity
3. Applicable Total Maximum Daily Loads (TMDLs) (Attachment E)
4. Applicable 303(d) listed items (Appendix 3)
5. Constituents added due to Effluent Limitation Guidelines (ELGs) (Attachment F)
6. Toxic chemicals identified in 40 C.F.R. §§ 110, 117, and 302 [TRI reported chemicals – see General Permit section X.G.1.d.ii.b)]




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### VIII. Discharge Standards

The General Permit requires sampling results be compared to discharge standards:

1. Numeric Action Levels (NALs)
2. TMDL-related Numeric Action Level (TNALs) (effective as of July 1, 2020); and
3. Numeric Effluent Limits (NELs) (effective as of July 1, 2020)



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### VIII. Discharge Standards (continued)

#### NALs

Two types of NAL Exceedances (See General Permit Table 2):

1. **Annual NAL Exceedance** – occurs when average of all sampling results within reporting year for a *single parameter (except pH)* exceeds applicable annual NAL
2. **Instantaneous Maximum NAL Exceedance** – occurs when two or more analytical results from samples taken for *any single parameter* within a reporting year exceed applicable instantaneous maximum NAL



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## VIII. Discharge Standards (continued)

### NALs (continued)

- NALs are targets to help a facility determine their discharge storm water quality and response with BMPs to improve the water quality
- NALs are not violations of the General Permit as long as a facility responds to the exceedance(s) properly through the General Permit's Exceedance Response Action (ERAs) process (see General Permit Section XII).



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## VIII. Discharge Standards (continued)

### TNALs

- Like NALs, TNALs are targets to help a facility determine their discharge storm water quality; however, they are based on the receiving water quality standard outlined in Attachment E of the General Permit
- Like NALs, TNALs are not a violation of the General Permit as long as a facility responds to the exceedance properly through the General Permit's Exceedance Response Action (ERAs) process (see General Permit Section XII)



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## VIII. Discharge Standards (continued)

### TNALs (continued)

- TNAL exceedances are applied like NAL instantaneous maximum NALs; there are no annual TNALs in the General Permit.



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## VIII. Discharge Standards (continued)

### NELs

- Unlike NALs and TNALs, NELs are General Permit Limits and are a violation of the General Permit and must be responded to in accordance with Water Quality Based Corrective Actions, as outlined in General Permit Section XX.B.
- NELs exceedances are applied like TNALs in that they are instantaneous maximums and have no annual values



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## VIII. Discharge Standards (continued)

### NELs (continued)

- NELs are based on the receiving water quality standard outlined in Attachment E of the General Permit.
- Due to being a General Permit violation, having a NEL makes a facility subject to penalties.



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## IX. Regulatory Inspections

### Inspection and Entry

According to General Permit Section XXI.H-J, state and locally agencies are:

- Entitled to site access to sample or monitor at reasonable times (facility operating hours)
- Request to view copies of documents required to be kept by the Industrial General Permit



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## IX. Regulatory Inspections

### Preparing for the Regulator Inspection

1. Make sure to keep up with documenting monthly observations (Form 2) and storm water observation (Form 1). You never know when they will be calling. Do not pencil whip!!! Regulators are not dumb; they will spot that a mile away!!
2. Make sure your Form 1 storm water observations match the information on the chain of custody (COC)



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## IX. Regulatory Inspections

### Preparing for the Regulator Inspection...continued

3. While the General Permit requires having up to 5 monitoring years (July 1st, to June 30th) of documentation, at a minimum, you should definitely:
  - Have at least the previous monitoring year's documentation; and
  - Your current monitoring year to date documentation completed and ready for review.



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## IX. Regulatory Inspections

### Preparing for the Regulator Inspection...continued

4. Have previous monitoring year or if done, current monitoring year annual training documentation (training roster and training material) ready for review.
5. Clean outside/exposed industrial areas... oh, and incase I forgot to mention it, clean outside/exposed industrial areas.
6. Make sure that secondary containment pallets or drip pans are cleared of any fluid build-up.
7. Check on relatively easily replaceable BMPs (drain inserts, filtration socks, oil absorbent socks, etc.) and clean or replaced them if necessary and possible.



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