

UPDATE >2012

CCGP Issue #1.1 REVIEW

For QSD and QSP Registration and Renewal

Feedback from your Regional Water Boards

THIS ISSUE: ↙ Regulator's top compliance concerns

- NOI & Waivers
- Risk Level
- SWPPPs
- REAPs
- Monitoring and Inspection
- Annual Reports
- Post-Construction
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- LRP



This CGP Review is a collection of comments from Regional Water Board inspectors regarding commonly misunderstood elements of the CGP. These comments are organized by Project Documentation, Implementation, and Closeout. This issue also addresses major changes from the 2012 permit reissuance.



2012 Permit Reissuance

The exam is now based on the CGP as amended in 2012. Here, a few common questions and misconceptions are addressed...

1. The Numeric Effluent Limitation (NEL) standards for ATS did not change in the 2012 permit reissuance. And be aware that ATS NELS apply to all locations that use ATS, even though Attachments C and D of the CGP do not mention ATS NELS. The standards are 10 NTU for daily weighted average and 20 NTU for any single sample.
2. NELs for pH and turbidity at Risk Level 3 / LUP Type 3 construction sites contained in Order 2009-0009-DWQ are no longer in effect, unless ATS is used.
3. Receiving water monitoring is required only for Risk Level 3 / LUP Type 3 construction sites that have discharges with measurements of turbidity greater than 500 NTU or are at risk for pH levels outside the range of 6 to 9.

Project Documentation

This section addresses the concerns of Regional Water Board staff relating to project type, project assessment, and permit registration documents or a high risk of discharge outside this range.

LRP & SMARTS

Help your LRP understand the permit (and pass along this newsletter). The Help Guidelines in SMARTS helps new LRPs register and shows how to link SMARTS users to a particular project (WDID).

LUP (Linear Underground/Overhead Projects)?

Straight... narrow... *but not linear!* According to the CGP definition, linear projects are overhead or underground utility projects. They do not include transportation projects such as roads, bike paths, and trails.

Is Increasing Water Line Size Always Considered New Construction?

No. Improvements for code compliance are considered maintenance and no permit coverage is required. However, increased capacity for growth is considered new construction and requires permit coverage.

Want an Erosivity Waiver? (Who Doesn't?)

When applying for an erosivity waiver, start a regular NOI. Only after you enter the R value will the SMARTS system prompt you to move forward with a waiver request. Applications for waivers will be rejected if construction start date and end of construction date results in an R value of 5 or higher. SMARTS will explain to the users why waivers are rejected. SMARTS will skip over the attachment tab when doing a waiver, *but click on this tab to proceed to the EPA Calculator* and attach your calculations in SMARTS.

Risk Level

Include an appendix for your manual risk calculations!

Know how to manually determine risk. Because the SMARTS system is not as precise as manual calculations, risk levels calculated manually can be more accurate. One project, for example, was estimated at Risk Level 3, but the manual method resulted in Risk Level 2.

Use the best data:

In many cases, incorrect R values are used. Isoerodent maps are difficult to read, so take the extra time to find your precise location and interpolate between the isoerodent values.

LUP compliance requirements and Tahoe compliance requirements are unique and different from the general training you may have received. Please be aware of specific requirements... for LUPs, see Fact Sheet II.B.2, Section II.A. and Attachment A of the order.

Did You Know?

The Common Plan of Development is only used to determine if the 1-acre threshold for permit coverage is reached. A new LRP buying only a portion of the development need only apply for coverage for the purchased portion (not the whole development).

- K values from maps are often conservative. Onsite soil analysis may be worthwhile if the site has a high risk level using mapped data. *(See CGP Appendix 1)*
- LS values in SMARTS may show a higher value than a site-specific evaluation might yield.
- Check your maps! Receiving water risk level is based on watershed planning areas, so even though your immediate stream reach may not be impaired, downstream risks may exist.
- Remember: Upload supporting information for manual determination of K, LS, and receiving water risk as part of PRDs.

What does construction duration include? It starts with clearing and grubbing and ends with final stabilization, including planned inactivity.

SWPPPs

- Assure that the site grading plan in the SWPPP matches the site.
- Assure that your LRP certifies your QSD name and number in SMARTS.
- Visit your construction site!
 - *Assure your SWPPP is site-specific.*
 - *Identify your discharge points throughout all phases of construction.*
- Post-construction standards apply to all projects that will be terminated after September 2, 2012. ***(Following the regional Board-approved standards of your municipalities fullfills this requirement!)***

**Do I need to purchase the CASQA handbook for basic design?
No, SE-2 is free! Get it here: www.casqa.org/store/products/tabid/154/p-171-fact-sheet-se-2.aspx**

Implementation

REAPs

Water Board inspectors have noticed two requirements are often missing in a REAP:

1. The NOAA weather report for that storm event
2. Verification or certification that the REAP is developed by a QSP

Monitoring and Inspection

Be aware! Post-rain event inspections are required on all sites regardless of level of activity. But if there is no construction activity of any kind at a site for at least 14 days, then it could be argued that there are no operating or business hours at the site to perform some of the requirements. If you think your site qualifies for this type of relief, contact your Regional Board. Specifically, an “inactive site” may get relief from rain event inspections and sampling, which are not required outside business hours. However, an “inactive site” is still required to comply with all other permit provisions, including effective soil cover, weekly inspections, and BMP maintenance.

No discharge: Your Regional Water Board will consider local rain gauge data to see if your site received rain. Clearly document if discharges do not occur during qualifying rain events.

Words of advice: A rain event cannot conclude until there are 48 hours without rainfall. Therefore, rain events can span multiple days. It may be that 0.5 inch of rain is not reached until day 2 or later. However, all days having discharge are considered part of the qualifying event. If discharge is observed, collect samples each day until 48 hours without precipitation pass. Dischargers are only required to electronically report data when the qualifying event threshold is reached.

Permit reminder for sampling:

1. At least three samples are required each day.
2. Every discharge point is sampled at least once daily.



3. The calculated daily turbidity average must be characteristic of the discharges from the site. The discharger must explain how the daily average is calculated. The following page compares two acceptable weighting alternatives to a straight average of all samples. In some cases reporting average pH values is misleading, so report the average, but note whether individual samples are outside the NAL range of 6.5 to 8.5 to ensure proper follow-up for problem drainages. The SWRCB is continually providing updates on pH issues and other permit compliance issues. Please check the FAQ: http://www.waterboards.ca.gov/water_issues/programs/stormwater/gen_const_faq.shtml



Sampling sheet flow is challenging, videos can help: www.youtube.com/watch?v=AmEJUNp44aU

pH Hints

Good technique will result in a sample that is “representative.”

A few techniques that are commonly overlooked include:

- Wait one minute for pH readings to stabilize.
- Fully immerse probe.
- Properly store your probes.
- pH paper is not allowed!
- Do not use expired pH standards.

Do you have pH problems?

- A common misconception is that only concrete and wallboard affect pH. Other construction materials may cause pH problems.
- For example, lime is a soil amendment that is sometimes used to achieve optimal water content for compaction, but lime also causes pH changes in runoff. To help lessen pH increases, consider avoiding lime application during precipitation.

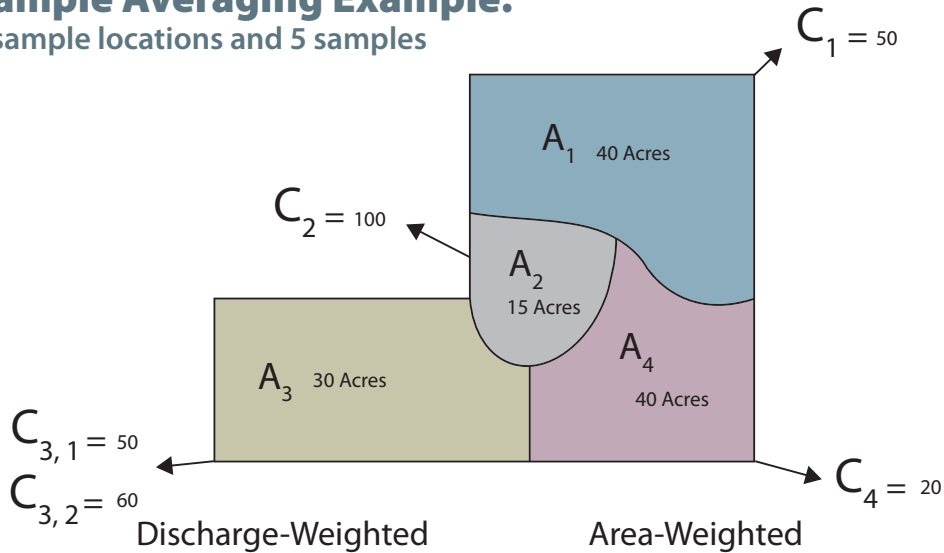
Where do I sample? The point of compliance is the project boundary.

Reporting Period: The reporting period is July 1 through June 30. All annual reports must also include any ad hoc reports. An annual report must be submitted for sites that are active for three months or more in each reporting period.

Have an NAL? Remember: Report **ALL** Risk Level 2 exceedance data within **10 days** (regardless of risk, and don't just submit averages). All Risk Level 3 must submit **ALL** data within **10 days** (new 2012 reissuance requirement). Submit **ALL** compliant data before the annual report as an ad hoc report.

Sample Averaging Example:

4 sample locations and 5 samples



Discharge-Weighted

Area-Weighted

$$\frac{\sum_{i=1}^n \bar{C}_i}{n} \quad \text{Method A}$$

$$\frac{\sum_{i=1}^n \bar{C}_i * A_i}{\sum_{i=1}^n A_i} \quad \text{Method B}$$

n = number at discharge locations

\bar{C}_i = daily average of all samples at location i

$$\bar{C}_i = \sum_{s=1}^j C_{i,j}$$

j = number of daily samples at a particular discharge location

Method A Example

$$\frac{\sum \bar{C}_i}{n} = \frac{50 + 100 + \left(\frac{50+60}{2}\right) + 20}{4} = 56.3$$

Method B Example

$$\frac{\sum_{i=1}^n \bar{C}_i * A_i}{\sum_{i=1}^n A_i} = \frac{(50 \cdot 40) + (100 \cdot 15) + \left(\frac{50+60}{2}\right) \cdot 30 + (20 \cdot 40)}{(40 + 15 + 30 + 40)} = 47.6$$

Annual Reports

Did you know? All Regional Water Boards compile a list of sites that fail to submit an annual report... and notices follow!

Let me in! For LRPs who cannot access their accounts because they forgot their password: The password reset is on the login page or you can contact storm water help desk at 1-866-563-3107.

Where do I report more data? Use ad hoc reports to disclose individual sample results that are not shown in the daily averages. Any data collected should be entered in the ad hoc report and not uploaded as a Word document. www.swrcb.ca.gov/water_issues/programs/stormwater/docs/adhoc.pdf

Closeout: Notice of Termination (NOT)

Some area of common confusion regarding project closeout concern partial year reporting, percent coverage, and using SMARTS.

Partial Year Reporting

Sites filing an NOT with three or more months of active construction after June 30 must submit a partial-year annual report covering the period from June 30 to project termination. For example, if you have four months in the new reporting year (July through October), prepare a report for this period as well as the previous reporting period (July 1 through June 30).

What is 70% coverage? Our water board inspectors explain that 70% coverage applies to soils that are left exposed after construction is complete. Roofs, streets, sidewalks, driveways, and other permanent impervious surfaces cannot be included in this calculation. For timely updates on this issue, please check the SWRCB FAQ: http://www.waterboards.ca.gov/water_issues/programs/stormwater/gen_const_faq.shtml

Think you are done? Always log back in to SMARTS and check to make sure your NOT has been certified and submitted.

More questions? Contact your local Regional Water Board:
www.waterboards.ca.gov/waterboards_map.shtml