

November 13, 2017

Two Questions Every Industrial Storm Water Permittee Should Answer Before January 1, 2018

If your facility is permitted under [California's Industrial General Storm Water Permit](#) (IGP), then you probably feel like you earned an advanced degree in storm water management with the time and effort it takes to understand the new permit. We respect your knowledge, and the time invested to earn it . . . but can you answer the two questions every IGP permittee should know before New Year's Day 2018?

Question 1: Does your facility discharge to a TMDL-listed water?

If you're asking yourself, "What's a TMDL and why does it matter to me?" here's the short-ish answer. The federal [Clean Water Act](#) requires the State Water Board to prepare a list of impaired water bodies and to set pollutant limits to restore them. TMDL stands for "total maximum daily load," which is defined as the maximum amount of a pollutant that a water body can receive from all point and non-point sources while still attaining water quality standards.

When the State Board adopted the IGP in 2014, it recognized that additional time would be required to incorporate existing TMDLs into the permit. In 2016, the Regional Boards submitted their proposals for incorporating TMDLs into the IGP. After deliberating over those submittals for over a year, the State Board is close to releasing its proposal for how to incorporate TMDLs into the IGP.

If your facility discharges to a TMDL-listed water, you may soon need to meet new discharge standards, depending on the action the State Board takes to incorporate TMDLs into the IGP. We expect the State Board to release its proposal before the end of the year, and to adopt the revised IGP in early 2018.

Question 2: Did your facility enter Level 1 or Level 2 in the 2016-2017 storm water year?

This should be an "easy" question since the State Board notifies permittees of a change in status through SMARTS. If you were notified of a change in status to Level 1 or 2, then this is a not-so-gentle reminder to call your favorite Qualified Industrial Storm Water Practitioner (QISP) because that is who will need to prepare your Level 1 Exceedance Response Action (ERA) Report or Level 2 ERA Plan before January 1, 2018.

It is now that time of year when storm water professionals think longingly of Thanksgiving and holidays with family—dreams that are irreconcilable with the crushing amount of work requested of them before Jan. 1, 2018. If your facility is not on your storm water professional's work list, we encourage you to contact them today.

So . . . how did you do on our exam? We hope you got an A+. If not, we're here to help.

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