

Storm Water Pollution Prevention Plan
New Construction General Permit
Changes in 700 words or less....



The CGP coverage timeline states that existing dischargers continue to comply with the existing permit until July 1st, 2010. Upon the effective date new discharges will have to be filed electronically under the new permit guidelines. These electronically filed documents are known as PDRs (permit registration documents). The PDRs will consist of; a notice of intent (NOI), a site map, signed certification statement and the first annual fee which is found on attachment B of the permit. The PDRs will be filled by a legally responsible person (LRP). For more information, visit the SMARTS web site <https://smarts.waterboards.ca.gov/smarts/faces/SwSmartsLogin.jsp>

Existing projects will be deemed as ‘grandfathering’ in and be granted Risk Level 1 status. The exceptions to the ‘Grandfathering In’ status include; All projects must be completed within two years of the permit adoption and if the Regional Water Board requires a risk assessment due to the site having a history of non compliance or poses a significant risk to the quality of the water.

The approaches to defining projects as ‘Risk,’ are down into the following, the relative amount of sediment that can be discharged which is driven largely driven by scheduling and the sites characteristics. A Revised Universal Soil Loss Equation or (RULSE) system will determine; the rainfall/ runoff erosive waiver, the rate of sheet and rill erosivity (tons/acres), soil erodibility factor and the length slope factor.

Notable changes from the old permit to the new one include;

The rainfall erosivity waiver

- 1 and Five acres and rainfall erosivity value less than or equal to five, certification done through the PRD process in SMARTS and if the schedule changes and the erosivity level is greater than 5, must apply for coverage.

Technology based numeric action level (NALs)

- The Regional Water Board may require the submittal of an NAL exceedance report for NALs over the limit.

Technology based numeric effluent limitations (NELs)

- This is classified for Level 3 sites
- A violation report must be submitted within 24 hours for an exceedance that was identified through sampling results, description of the onsite BMPs and corrective actions taken.

Compliance storm event, active treatment systems (ATS)-

- This permit establishes a 5 year, 24 hour compliance storm event exception from the NELs

Active treatment systems (ATS)

- Specific requirements are found in attachment F of the permit
- NELS based on effective ATS performance (a) 10 NTU-Daily flow weighted average (b) 20 NTU- Single Sample
- Compliance storm event: 10 year 24 hour
- Proper personal training

Best management practices

- More minimum BMPs and requirements previously required as elements of the SWPP or suggested as guidance.

Effluent monitoring

- After a qualifying rainfall, a minimum of three samples per day. (½ inch or more of precipitation at the time of discharge)

Receiving water monitoring

- Receiving water- NEL exceedance and direct discharge to receiving waters, bioassessment- 30 acres or larger and direct discharge to receiving waters.

Post construction

- Match post and pre runoff volumes
- Not covered by an active Phase I or Phase II Municipal Separate Storm Sewer System (MS4) NPDES permit that has an approved Storm Water Management Plan.
- Effective three years after permit adoption (September 12, 2012)

Rain event action plan (REAP)

- Designed to protect all exposed portions of the site within 48 hours prior to any likely precipitation event.

Annual reporting

- All projects prepare and electronically submit an Annual Report no later than September 1 of each year using SMARTS.
- Provide information needed for overall program evaluation and public information- summary and evaluation of all sampling

Certification and training

- A Qualified SWPPP developer (QSD) and a Qualified SWPPP practitioner (QSP) will have the prerequisite registrations and certifications listed in Section VII of the CGP.
- Will also have attended a State Water Board sponsored or approved training course within two years after the permit adoption date.

Linear utility Projects

- Includes requirements for all Linear Underground/Overhead Projects (LUPs) over one acre.
- Risked based- LUPS will be broken into project segments
- Types are analogous to the risk levels for the traditional construction projects.

Resources

- The Regional Water Quality Control Boards
- California Storm Water Quality Association
- California Storm Water BMP Handbook

Authors:

Marjorie Boone

Ehs International, Inc.

President/CEO

AGC-Los Angeles Board Member

President-Elect Santa Ana River Basin Section and Safety Chair of the California Water Environment Association (CWEA)

Marc Brown, REA

ehs International, Inc.

www.ehsinternational.org

714.245.9440 949.540-6800

Experts in SWPPP Training and Consulting