

8.0 FREQUENTLY ASKED QUESTIONS*

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A. General

1. How do I know if I need coverage under the Industrial General Permit (Order 2014-0057-DWQ)?

A broad range of industrial facilities are required to obtain permit coverage per federal regulations. Facilities that must obtain permit coverage include manufacturing facilities, mining operations, disposal sites, recycling yards, transportation facilities, and other industrial facilities. See Attachment A of the [Industrial Storm Water General Permit](#) (IGP) for a complete list of facilities that are required to obtain coverage. [Click here](#) to view a list of the Standard Industrial Classification (SIC) codes that may be required to obtain coverage under the IGP. The Regional Water Boards are also authorized to designate facilities that must obtain coverage under the Industrial General Permit (see details in Section XIX.F of the IGP).

2. Who must apply?

All Dischargers that operate facilities that are described in Attachment A of the IGP or are designated by the Regional Water Board are required to submit either a new IGP application, referred to as a Notice of Intent (NOI), or a No Exposure Certification (NEC) certifying that no industrial pollutants associated with their industry are exposed to storm water. The NOI must be submitted to the State Water Board by August 14, 2015 (or at least seven days prior to commencing the industrial activity operations, whichever is later, for new dischargers), and shall comply with the Permit Registration Document (PRD) requirements in the IGP. The NEC must be submitted by October 1, 2015 (or at least seven days prior to commencement of industrial activities, whichever is later, for new dischargers).

The Discharger, which is defined in Attachment C of the Industrial General Permit, must submit an NOI for each industrial facility that is required by the federal regulations to obtain a storm water permit. The required industrial facilities are listed in Attachment A of the [IGP](#) and are also defined in 40 Code of Federal Regulations Section 122.26(b)(14). The facility operator is typically the owner of the business or operation where the industrial activities requiring a storm water permit occur. The facility operator may be responsible for all permit related activities at the facility. Where operations have discontinued and significant materials remain on site (such as closed landfills), the landowner may be responsible for filing an NOI and complying with the IGP. Landowners may also file an NOI for a facility if the landowner, rather than the facility operator, is responsible for compliance with the IGP.

3. Who is not required to submit a Notice of Intent (NOI) or a No Exposure Certification (NEC)?

Dischargers that operate facilities described below are not required to file for new IGP coverage unless the facilities have been designated by the Regional Water Board:

- a. Facilities that are not described in Attachment A;

- b. Facilities that are described in Attachment A but do not have discharges of storm water associated with industrial activity to waters of the United States (see details in Section XX.C. of the IGP); or,
- c. Facilities that are already covered by another National Pollutant Discharge Elimination System (NPDES) permit for discharges of storm water associated with industrial activity.

4. How do I file a new NOI or NEC?

File the NOI or NEC through [SMARTS](#). Only a Legally Responsible Person can certify and submit the NOI application or NEC certification.

5. What is required to file a new NOI?

- a. A completed NOI application
- b. A site map (See details in Section X.E of the IGP)
- c. A Storm Water Pollution Prevention Plan (See details in Section X of the IGP)
- d. A signed Electronic Authorization Form.

6. What is required to file a new NEC?

- a. NEC Application/NEC Checklist
- b. Site Map (See details in Section X.E of the IGP)

7. Electronic Authorization Form.

What is the IGP application fee?

- a. The NOI application fee is \$1632
- b. The NEC application fee is \$200
- c. Checks should be made payable to: SWRCB

Note: The Current Fee Schedule can be viewed [here](#)

8. What are the timelines for IGP applications and renewals?

Facility operators of existing facilities under the 1997 IGP (State Water Board Order 97-03-DWQ) must recertify their NOI in accordance with the new IGP (State Water Board Order 2014-0057-DWQ) on or by August 14, 2015.

Facility operators of new facilities (facilities beginning operations after July 1, 2015) must file an NOI in accordance with these instructions at least seven days prior to the beginning of operations or by August 14, 2015, whichever is later.

Once the completed NOI, site map, and appropriate new IGP fee have been submitted to the State Water Board, the NOI will be processed and the applicant will be issued a Waste Discharge Identification (WDID) Number. Please refer to this number when you contact either the [State Water Board](#) or a [Regional Water Quality Control Boards \(RWQCB\)](#).

NEC certifications must be submitted by October 1, 2015 (or for new dischargers, at least seven days prior to commencement of industrial activities or October 1, 2015, whichever is later.)

- 9. I have coverage under the expiring 1997 IGP (State Water Board Order 97-03-DWQ). How do I re-apply for coverage under the new IGP?**
Dischargers with an active WDID Number under the 97-03-DWQ Order must recertify their Notice of Intent through the Storm Water Multiple Application and Report Tracking System (also referred to as the SMARTS database). To recertify the Discharger must have a Secret Code Number generated by the State Water Board.
- 10. Where do I get the Secret Code Number?**
Contact the State Water Board at (866) 563-3107 or stormwater@waterboards.ca.gov to obtain the Secret Code Number if you cannot locate the Secret Code Number previously mailed by the State Water Board.
- 11. What is the annual compliance fee?**
The annual fee is the same as the IGP application fee. The annual fee is paid annually and is on the billing cycle of when the IGP application was processed (the Discharger received a Waste Discharge Identification Number - WDID) and maintains regulatory coverage under the new IGP. The amount of the annual fee is the same as the application fee submitted with the NOI or NEC.
- 12. How long is my coverage under the new IGP in effect?**
Your coverage under the IGP is in effect until you submit a valid Notice of Termination (NOT) through the Storm Water Multiple Application and Report Tracking System or until Order 2014-0057-DWQ expires (without being administratively extended) or is superseded. The [Regional Water Quality Control Boards \(RWQCB\)](#) however, may deny the NOT if the NOT is considered invalid.
- 13. How can I avoid the most common mistakes made in applying for the new IGP?**
Make sure the Legally Responsible Person mails in the original signed Electronic Authorization Form and correct application fee amount.
- 14. What are the regulations that apply to the new IGP? Where can I get copies?**
The [new IGP](#) is available from the [State Water Board's website at www.waterboards.ca.gov](#). The federal Clean Water Act is available [here](#).
- 15. How do I transfer the WDID number to a new owner or operator?**
The WDID number is not transferrable to a new owner or operator. The previous owner or operator must file a Notice of Termination and the new owner or operator must file a new NOI to obtain a new WDID number.
- 16. The Legally Responsible Person (LRP) is no longer with the company or agency. How does the new LRP gain access to the NOI records?**
Contact the State Water Board at (866) 563-3107 or stormwater@waterboards.ca.gov to request a change of the LRP. The new LRP must create a new User ID and enter the Secret Code Number generated by the State Water Board to certify and claim all existing applications.
- 17. What if I have further questions?**
If you have any questions or need assistance completing the NOI or NEC, please call the appropriate [Regional Water Quality Control Board](#) or the [State Water Board](#) at (866) 563-3107 or stormwater@waterboards.ca.gov.

B. SIC Codes

1. What is an “auxiliary” function? Do auxiliary facilities need permit coverage?

Please read IGP [Fact Sheet](#) Page 9-11.

2. I need to enter by SIC code in SMARTS. What is a SIC code?

You can watch the video on SIC codes here: https://www.youtube.com/watch?v=cTM_P2gwJMs

The SIC Code manual is available online at: https://www.osha.gov/pls/imis/sic_manual.html

A list of SIC codes that may be regulated under the IGP can be found here: http://www.waterboards.ca.gov/water_issues/programs/stormwater/sicnum.shtml

C. SMARTS

1. What are the SMARTs Deadlines?

For the complete PRD requirements, see Section II. Receiving General Permit Coverage in the new IGP order.

Existing Dischargers with an NOI under the 1997 IGP – recertify NOI by August 14, 2015 with the site map and SWPPP.

New NOI/New Operation – submit and NOI seven days prior to commencing the industrial activity operations (along with required PRDs) or by August 14, 2015, whichever is later.

NEC – for existing facilities obtaining NEC coverage – October 1, 2015 (along with required PRDs).

NEC – for a new facility the meets the NEC criteria - seven days prior to commencing industrial activity operations (along with required PRDs) or by October 1, 2015, whichever is later.

NONA – upon request by the Regional Water Board or when the Discharger decides to submit a NONA. For a NONA asserting no discharge to a Waters of the United States, the Discharger is required to meet the no discharge criteria in the new IGP on July 1, 2015 and must either obtain coverage under the new IGP or submit a NONA technical report signed by a California licensed professional engineer when requested by the Regional Water Board.

Annual Report – July 15 of the reporting year (starting July 2016)

Sampling results – 30 days after receiving the results from the analytical laboratory

2. To enroll under the new IGP, what do Dischargers need to do to recertify their Notice of Intent (NOI) in SMARTS? What information is needed to recertify an NOI? Is there an opportunity to make changes to the NOI as part of the recertification?

- a. Recertify existing WDID Numbers/Existing NOI
 - i. Things you will need:
 - ii. Access to the internet
 - iii. SMARTS Legally Responsible Person (LRP) User Account

- iv. WDID Number
 - v. Secret Code Number (SCN)
 - vi. Storm Water Pollution Plan (SWPPP)
 - vii. Facility Site Map
- b. New WDID Numbers/new NOI
- i. Permit Registration Documents (PRDs):
 - ii. NOI
 - iii. SWPPP
 - iv. Site Map
 - v. Application Fee
 - vi. Electronic Authorization Form
 - vii. NOTE: PRDs are required to be submitted in SMARTS
- c. Dischargers are allowed to update information during recertification and Dischargers enter the information when they apply for a new WDID/application.

3. When will the Annual Report be available in SMARTS?

The first electronic Annual Report due in SMARTS for the new IGP is July 15, 2016. The State Water Board will have this Annual Report available before this due date. The Annual Report under the 1997 IGP must be submitted via SMARTS by or on August 14, 2015.

4. How do I submit the Annual Report required in the new IGP?

The Discharger (LRP, DAR, DEP) will login into SMARTS, go to the reporting option, open the applicable Annual Report and answer the questions (yes, no and explanation text). The Discharger will then certify and submit the Annual Report to the Water Board in SMARTS.

5. If you qualify for an NEC as an existing Discharger, do you need a SWPPP by July 1, 2015?

Dischargers who file valid NECs in accordance with these instructions are not required to implement Best Available Technology Economically Achievable /Best Conventional Pollutant Control Technology and comply with the SWPPP and monitoring requirements of this General Permit. If you are an existing Discharger, recertify the NOI, then login to SMARTS and switch the NOI to an NEC, certify and ensure that the uploaded site map is correct and uploaded in SMARTS. If the Discharger does not switch the status by August 14, 2015, SMARTS will characterize the site as having an incomplete NOI recertification.

6. What is the “industrial area exposed to storm water” field for?

This field is to provide data to the fee unit to explore the possibility of developing tiered fees in the future based upon percentage of industrial area/activity exposed to storm water.

7. Who can be an LRP?

Read Section XXI.K of the IGP order.

8. What samples do I have to report in SMARTS? When are samples required to be entered into SMARTS?

Dischargers are required to report all samples taken at compliance locations (discharge locations/sampling locations) in SMARTS from storm water discharge events that were collected and analyzed. Samples taken for run-on, and internal “BMP” characterization samples are not required to be entered in SMARTS. SMARTS allows the Discharger to enter other types of samples, if required.

9. Is the SMARTS storm water analytical sampling data average based equal area contributions?

No, the average is not based on equal area contributions. SMARTS calculates an arithmetic average based upon the Qualified Storm Event storm water sampling results entered by the Discharger.

D. SWPPP

1. What information is a Discharger required to include on the Site Map uploaded in SMARTS?

Section X.E of the new IGP describes the require elements:

X.E. Site Map Requirements

The Discharger may provide the required information on multiple site maps. The Discharger shall prepare a site map that includes notes, legends, a north arrow, and other data as appropriate to ensure the map is clear, legible and understandable.

- a. The facility boundary, storm water drainage areas within the facility boundary, and portions of any drainage area impacted by discharges from surrounding areas. Include the flow direction of each drainage area, on-facility surface water bodies, areas of soil erosion, and location(s) of nearby water bodies (such as rivers, lakes, wetlands, etc.) or municipal storm drain inlets that may receive the facility's industrial storm water discharges and authorized NSWDDs;
- b. Locations of storm water collection and conveyance systems, associated discharge locations, and direction of flow. Include any sample locations if different than the identified discharge locations;
- c. Locations and descriptions of structural control measures¹¹ that affect industrial storm water discharges, authorized NSWDDs, and/or run-on;
- d. Identification of all impervious areas of the facility, including paved areas, buildings, covered storage areas, or other roofed structures;
Locations where materials are directly exposed to precipitation and the locations where identified significant spills or leaks (Section X.G.1.d) have occurred; and
- f. Areas of industrial activity subject to this General Permit. Identify all industrial storage areas and storage tanks, shipping and receiving areas, fueling areas, vehicle and equipment storage/maintenance areas, material handling and processing areas, waste treatment and disposal areas, dust or particulate generating areas, cleaning and material reuse areas, and other areas of industrial activity that may have potential pollutant sources.

2. Do I need a QISP to develop my updated SWPPP?

No. QISP are only required to provide assistance to 1) New Dischargers discharging storm water associated with industrial activity to an impaired water body, 2) Discharges with level 1 ERA status, or 3) Dischargers with Level 2 ERA status.

E. Monitoring

1. What if I want to use a different test method than shown in SMARTS?

You will have to contact the State Water Board storm water unit so we can process the request. General Inquiries: stormwater@waterboards.ca.gov or Telephone Toll Free - 1-866-563-3107 or Fax - (916) 341-5543.

2. How soon are lab results required to be submitted into SMARTS?

Section XI.B.11: The Discharger shall submit all sampling and analytical results for all individual or Qualified Combined Samples via SMARTS within 30 days of obtaining all results for each sampling event.

F. Training

1. We have heard that SWRCB will require that Compliance Group Leaders be Trainers of Record.

Yes. Section XVI.B.1: A Compliance Group Leader must complete a State Water Board sponsored or approved training program for Compliance Group Leaders. The approved program chosen by the State Water Board was the Trainer of Record training. Compliance Group Leaders are able to begin groups in SMARTS July 1, 2015.

2. When will the QISP training be done?

The QISP training is expected to be available the winter of 2015.

G. Annual Report

1. When will monitoring forms for the new IGP be released?

Since the monitoring data will now be submitted into SMARTS, there are no template forms. Monitoring data is now submitted separate from the Annual Report. Visual observation records are no longer submitted in the Annual Report. Dischargers shall keep records in a manner consistent with the record keeping requirements in Section XXI.J. The analytical monitoring screens in SMARTS will be available July 1, 2015.

2. We have facilities that are relocating. Do they have to apply for a new permit?

IGP coverage is tied to a specific facility location. If a facility moves, a new application is required.

H. NEC

1. Will the State Board be developing a NEC checklist?

Yes, the NEC checklist is available in the SMARTS database.

I. NONA

1. When is the NONA required?

If a Discharger is eligible for NONA, the facility operator will be either told to submit a NONA report by the Regional Water Board or will submit one in SMARTS voluntarily instead of obtaining IGP coverage.

2. Where do we send the NONA application and the engineering report? Is it online or hard copy? Do we send a copy to the state or this is just at the regional level?

The NONA application and technical report must be submitted in SMARTS.

9.0 LIST OF ACRONYMS

AdHoc Report	AdHoc Monitoring Report
BMP	Best Management Practices
CBPELSG	California Board for Professional Engineers, Land Surveyors and Geologists
DAR	Duly Authorized Representative
DEP	Data Entry Person
DWQ	Division of Water Quality
ELGs	Effluent Limitations Guidelines and New Source Performance Standards
ERA	Exceedance Response Action
eAuthorization	Electronic Authorization Form
IGP	Industrial General Permit Order: 2014-0057-DWQ
LRP	Legally Responsible Person
NAL	Numeric Action Level
NEC	No Exposure Certification
NEL	Numeric Effluent Limitation
NOI	Notice of Intent
NONA	Notice of Non Applicability
NOT	Notice of Termination
NPDES	National Pollutant Discharge Elimination System
NSWD	Non Storm Water Discharges
PRDs	Permit Registration Documents
QISP	Qualified Industrial Storm water Practitioner
QSE	Qualifying Storm Event
SIC	Standard Industrial Classification
SMARTS	Storm Water Multiple Application and Report Tracking System
SWPPP	Storm Water Pollution Prevention Plan
WDID	Waste Discharge Identification Number