

# IGP Level 2 and What's Due

Facilities in California begin entering Level 2 status on July 1, 2017 for the first time. If you are one of these facilities, the time for action is NOW.

## What is Level 2?

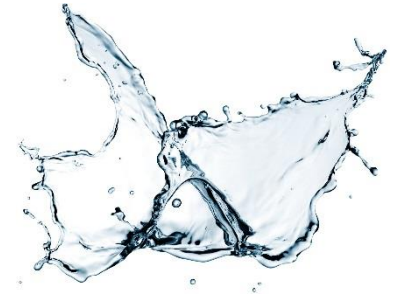
If your site is one of the 2,300 Level 1 sites and continued to have numeric action level (NAL) exceedances for a Level 1 parameter, your facility will be entering **LEVEL 2 STATUS**, which requires facilities to fully address their NAL exceedances through specific Level 2 demonstrations. This may require an in-depth analysis of your site, including reviewing available BMP treatment technologies, conducting environmental studies, and/or researching environmental background data and other information to develop robust Exceedance Response Actions (ERAs).

### January 1, 2018: Submit Level 2 ERA Action Plan

The Level 2 ERA Action Plan shall include a schedule and a detailed description of the tasks required to complete one or more of the following demonstrations\*:

- 1) Industrial Activity BMP Demonstration
- 2) Non-Industrial Pollutant Source Demonstration
- 3) Natural Background Pollutant Source Demonstration

➤ This plan must be implemented by 1/1/2019<sup>1</sup>



### July 1, 2017: Enter Level 2 Status

- If your site continued to have NAL exceedances for a parameter already in Level 1 status during the 2016-2017 reporting year, you are in **LEVEL 2** status.
- As with Level 1, Level 2 ERA Reports must be completed with the assistance of a QISP.

### January 1, 2019: Submit Level 2 ERA Technical Report

The Level 2 ERA Technical Report will include technical data, cost evaluations, and/or other supporting documentation to support your chosen demonstration\*.

#### \*Level 2 Demonstration Overview\*

Here's a quick description of each demonstration. Refer to IGP Section XII.D for all requirements of each:

- 1) **Industrial Activity BMP Demonstration:** Show which additional BMPs will be implemented to eliminate NAL exceedances (treatment must be considered). Your facility may also perform a cost analysis to determine economic feasibility of BAT/BCT<sup>2</sup>.
- 2) **Non-Industrial Pollutant Source Demonstration:** Demonstrate that exceedances are due solely to non-industrial pollutant sources (e.g., run-on, aerial deposition, etc.).
- 3) **Natural Background Pollutant Source Demonstration:** Demonstrate that exceedances are due solely to natural background sources (e.g., naturally-occurring iron in soil).

## We're here to help.

If your stormwater results show that you have a repeated NAL exceedance for an existing Level 1 parameter, you will begin Level 2 status on July 1<sup>st</sup>. If this is the case, you should already be thinking of how your facility will comply with the Level 2 provisions of the IGP. Our knowledgeable and resourceful QISPs have years of experience helping facilities to comply with stormwater regulations. If you need the services of a QISP, or simply have general questions about how to comply with your stormwater permit, give us a call. Contact Jayme Dryden, QISP ToR, at **(805) 764-6005** or [jdryden@alcorp.com](mailto:jdryden@alcorp.com).

2. Facilities are required to implement the federal standards called Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to control stormwater pollutants.

1. Unless a one-time extension up to six months is granted by the Water Board.