

California Storm Water – Industrial General Permit TMDL Amendment

The IGP has been revised to incorporate Total Maximum Daily Load (TMDL) storm water (SW) requirements. Here are some FAQs:

What are TMDLs, TNALs, & NELs?

TMDLs are additional, waterbody/shed-specific pollutant requirements that have been incorporated into the IGP. If your site discharges to a waterbody/shed with a TMDL, your SW may need to meet additional discharge TMDL numeric action levels (TNALs) and/or numeric effluent limitations (NELs) for specific pollutant parameters.

Why are NELs and TNALs important?

An NEL exceedance is a permit violation and can be subject to **mandatory minimum penalties of at least \$3,000 per violation per day**. A TNAL exceedance triggers response actions, but is not a permit violation.

Do TMDL requirements apply to me?

TMDLs are adopted for specific waterbodies/sheds and include areas of coastal Southern CA and Napa/Sonoma. Use the Water Board's map tool or call ALG for help to determine whether TMDLs apply to your site.

What do I have to do to meet TMDL requirements?

Affected sites must be prepared to meet any new TNALs/NELs and update their SWPPPs as necessary by the effective date of July 1, 2020. Even sites in baseline must assess compliance with TMDL requirements.

My facility is a No Exposure Certification (NEC) site. Do TMDLs apply?

No, TMDL requirements do not apply to facilities under NEC Certification.

Does SMARTS inform me of these requirements?

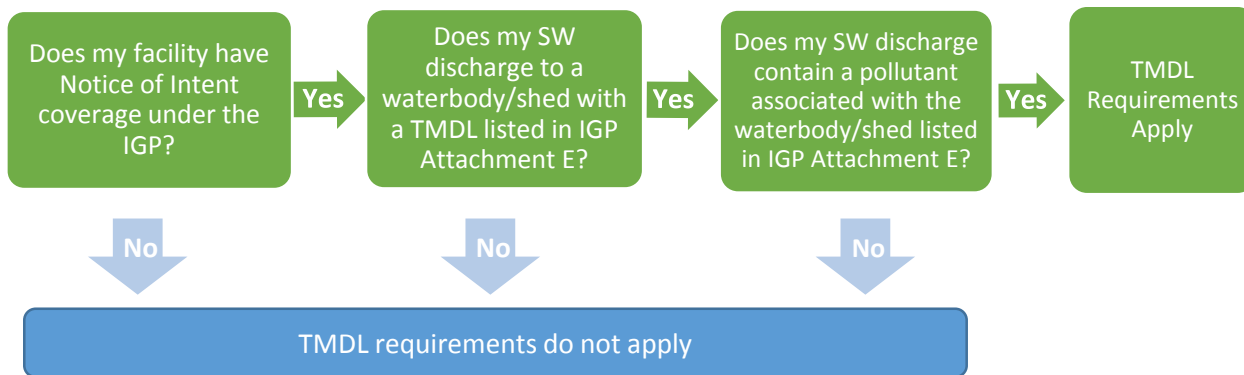
No, SMARTS does not inform facilities of additional requirements or calculate TNAL or NEL exceedances. It is your responsibility to update SMARTS reporting for any new TMDL requirements.

If I get a high sample, can I achieve compliance by averaging?

No, TNALs and NELs are instantaneous maximums only (2 or more exceedances per pollutant at any monitoring location) and are not evaluated based on averaging.

What if I can't meet these NELs by July 1, 2020?

If your facility can't meet these requirements in time, you can request additional time through a Time Schedule Order (TSO) that states a schedule of actions to be taken to achieve compliance and may include interim effluent limitations. There are also other compliance options available in Attachment I of the IGP.



The Water Board's IGP map tool (pictured above) highlights areas that are subject to TMDLs.

We're here to help.

Our knowledgeable and resourceful QISPs have years of experience helping facilities to comply with SW regulations. If you need help with these TMDL requirements or simply have general questions about complying with your SW permit, give us a call. Contact Jayme Dryden, QISP ToR, at **(805) 764-6005**; jdryden@algc.com, or Elliott Ripley, QISP, at **(805) 764-6004**; eripley@algc.com.