



QSP Training Module 6: Reporting

Ongoing Compliance Activities

Maintain in SWPPP

- Weekly inspection reports
- Daily logs
- NAL compliance data (as long as no NAL exceedance)
- REAP
- Quarterly Non-stormwater Inspection Reports

Upload to SMARTS

- Annual Report
- SWPPP modifications (major mods or quarterly)
- Photos (every 3 storms, linear only)
- NEL Effluent Monitoring (all)
- NEL Violation Report
- NAL Exceedance data
- NAL Exceedance Report (if requested by RB)

Compliance Activities: Risk Level 1

Task	Submittal Requirement
Weekly Inspection Report	Hold in SWPPP, submit with Annual Report
Storm Event Inspection Report	Hold in SWPPP, submit with Annual Report
SWPPP Modifications	Upload major modifications Upload revised SWPPP quarterly at a minimum
Quarterly Non-Stormwater Inspection	Hold in SWPPP, submit with Annual Report
Non-visible Pollutant Monitoring	Hold in SWPPP, submit with Annual Report
Annual Report	Covers July 1 – June 30, Due September 1



Compliance Activities: Risk Level 2

Task	Submittal Requirement
Weekly Inspection Report	Hold in SWPPP, submit with Annual Report
Storm Event Inspection Report	Hold in SWPPP, submit with Annual Report
Rain Event Action Plan (REAP)	Hold in SWPPP, submit with Annual Report
Weather forecast	Hold in SWPPP, submit with Annual Report
NAL compliance monitoring data	Hold in SWPPP, submit with Annual Report If NAL exceedance, submit to SMARTS within 10 days
NAL Exceedance Report	Submit to SMARTS if requested by RB
SWPPP Modifications	Upload major modifications Upload revised SWPPP quarterly at a minimum
Quarterly Non-Stormwater Report	Hold in SWPPP, submit with Annual Report
Non-visible pollutant Monitoring	Hold in SWPPP, submit with Annual Report
Annual Report	Covers July 1 – June 30; due on September 1

Compliance Activities: Risk Level 3

Task	Submittal Requirement
Weekly Inspection Report	Hold in SWPPP, submit with Annual Report
Storm Event Inspection Report	Hold in SWPPP, submit with Annual Report
Rain Event Action Plan (REAP)	Hold in SWPPP, submit with Annual Report
Weather forecast	Print daily, hold in SWPPP, submit with Annual Report
NAL compliance monitoring data	Hold in SWPPP, submit with Annual Report If NAL exceedance, submit to SMARTS within 10 days
NAL Exceedance Report	Submit to SMARTS if requested by RB
NEL compliance monitoring data	Submit to SMARTS within 5 days of conclusion of rain event
NEL Violation Report	Submit to SMARTS within 24 hours of NEL violation
SWPPP Modifications	Upload major modifications Upload revised SWPPP quarterly at a minimum
Quarterly Non-Stormwater Report	Hold in SWPPP, submit with Annual Report
Non-visible pollutant Monitoring	Hold in SWPPP, submit with Annual Report
Annual Report	Covers July 1 – June 30; due on September 1

Compliance Activities: LUP Type 1

Task	Submittal Requirement
Daily BMP Inspections	Hold in SWPPP, submit with Annual Report
SWPPP Modifications	Upload major modifications Upload revised SWPPP quarterly at a minimum
Photographs	Upload pre, during and post storm photos for every third storm
Annual Report	Covers July 1 – June 30 Includes

Note that weekly inspection report and Quarterly Non-Stormwater Report are not required for LUP Type 1 projects

Compliance Activities: LUP Type 2

Task	Submittal Requirement
Weekly Inspection Report	Hold in SWPPP, submit with Annual Report
Storm Event Inspection Report	Hold in SWPPP, submit with Annual Report
Daily BMP and Trackout Inspections	Log in SWPPP, submit with Annual Report
Weather forecast	Hold in SWPPP, submit with Annual Report
NAL compliance monitoring data	Hold in SWPPP, submit with Annual Report If NAL exceedance, submit to SMARTS within 10 days
NAL Exceedance Report	Submit to SMARTS if requested by RB
Photographs	Upload pre, during and post storm photos for every third storm
SWPPP Modifications	Upload major modifications Upload revised SWPPP quarterly at a minimum
Annual Report	Covers July 1 – June 30; due on September 1 Includes

Compliance Activities: LUP Type 3

Task	Submittal Requirement
Weekly Inspection Report	Hold in SWPPP, submit with Annual Report
Storm Event Inspection Report	Hold in SWPPP, submit with Annual Report
Daily BMP and Trackout Inspections	Log in SWPPP, submit with Annual Report
Weather forecast	Print daily, hold in SWPPP, submit with Annual Report
Photographs	Upload pre, during and post storm photos for every third storm
NAL compliance monitoring data	Hold in SWPPP, submit with Annual Report If NAL exceedance, submit to SMARTS within 10 days
NAL Exceedance Report	Submit to SMARTS if requested by RB
NEL compliance monitoring data	Submit to SMARTS within 5 days of conclusion of rain event
NEL Violation Report	Submit to SMARTS within 24 hours of NEL violation
SWPPP Modifications	Upload major modifications Upload revised SWPPP quarterly at a minimum
Annual Report	Covers July 1 – June 30; due on September 1

Weekly and Storm Event Related Inspection Reports

Risk Level	LUP Type
1 *	1
2 *	2 *
3 *	3 *

- Inspect site weekly, on standard projects
- Inspect site before, during, and after storm events
- Document inspections using checklist
- Retain records on site with SWPPP while construction is on going
- Maintain an electronic or paper copy of records for three years from the date generated or date submitted, whichever is last.
- Submit monitoring reports with Annual Report

Daily Visual BMP Inspections

Risk Level	LUP Type
1	1 *
2	2 *
3	3 *

- Linear projects only
- Maintain a log of inspections in the SWPPP
- Do not need to document using a checklist
- Ensure that records of all storm water monitoring information and copies of reports required by CGP be retained for a period of at least three years.

Daily Visual Track Out Inspections

Risk Level	LUP Type
1	1
2 *	2 *
3 *	3 *

- Linear and traditional 2, 3
- Maintain a log of inspections in the SWPPP
- Do not need to document using a checklist
- Ensure that records of all storm water monitoring information and copies of reports required by CGP be retained for a period of at least three years.

Site Photographs

Risk Level	LUP Type
1	1 *
2	2 *
3	3 *

- Linear projects only
- Take photos of all storm events, pre, during and post
- Upload to SMARTS every third storm event (only need to upload photos from one storm)
- Use SMARTS Attachments tab

Rain Event Action Plans

Risk Level	LUP Type
1	1
2 *	2
3 *	3

- Complete REAP 48 hours prior to 50% or greater forecast event
- Implement REAP 24 hours prior to forecast event
- Retain a paper copy of each REAP in the SWPPP
- Retain printed copy of forecast information from National Weather Service in the SWPPP

Risk Level	LUP Type
1	1
2 *	2 *
3 *	3 *

NAL Exceedance Report

- **If an NAL is exceeded**, Risk Level 2 and LUP Type 2 dischargers shall electronically submit all storm event sampling results to State Water Board no later than 10 days after the storm event
- **If no NAL or NEL exceedances**, Risk Level 3 and LUP Type 3 dischargers shall electronically submit all storm event sampling results to SMARTS within 5 days
- Regional Water Boards may require NAL Exceedance Reports.
- All Exceedance Report must be certified **by the LRP or Approved Signatory**

NAL Exceedance Report Requirements

Risk Level	LUP Type
1	1
2 *	2 *
3 *	3 *

- the analytical method(s), method reporting unit(s), and method detection limit(s) of each analytical parameter (analytical results that are less than the method detection limit are to be reported as "less than the method detection limit or <MDL")
- the date, place, and time of sampling
- any visual observation (inspections)
- any measurements, including precipitation
- a description of the current BMPs associated with the effluent sample that exceeded the NAL and any proposed corrective actions taken

Storm Event Related Sampling NAL Compliance

Risk Level	LUP Type
1	1
2 *	2 *
3 *	3 *

- Sample site runoff to document compliance with NAL for pH and turbidity
- If no NAL exceedances
 - Do not submit storm event sampling results to State Water Board

Storm Event Related Sampling NEL Compliance

Risk Level	LUP Type
1	1
2	2
3 *	3 *

- Sample to document compliance with NEL for pH and turbidity
- If no NEL violations
 - Electronically submit all storm event sampling results to State Water Board
 - No later than 5 days after the conclusion of the storm event.

NEL Violation Report

Risk Level	LUP Type
1	1
2	2
3 *	3 *

- NEL Violation Reports must be submitted to SMARTS within 24 hours after exceedance has been identified
- LRP/AS shall certify each report
 - 24-hour countdown could be an issue
 - On risk level 3/LUP Type 3 projects, always have an LRP/AS on standby during rain events

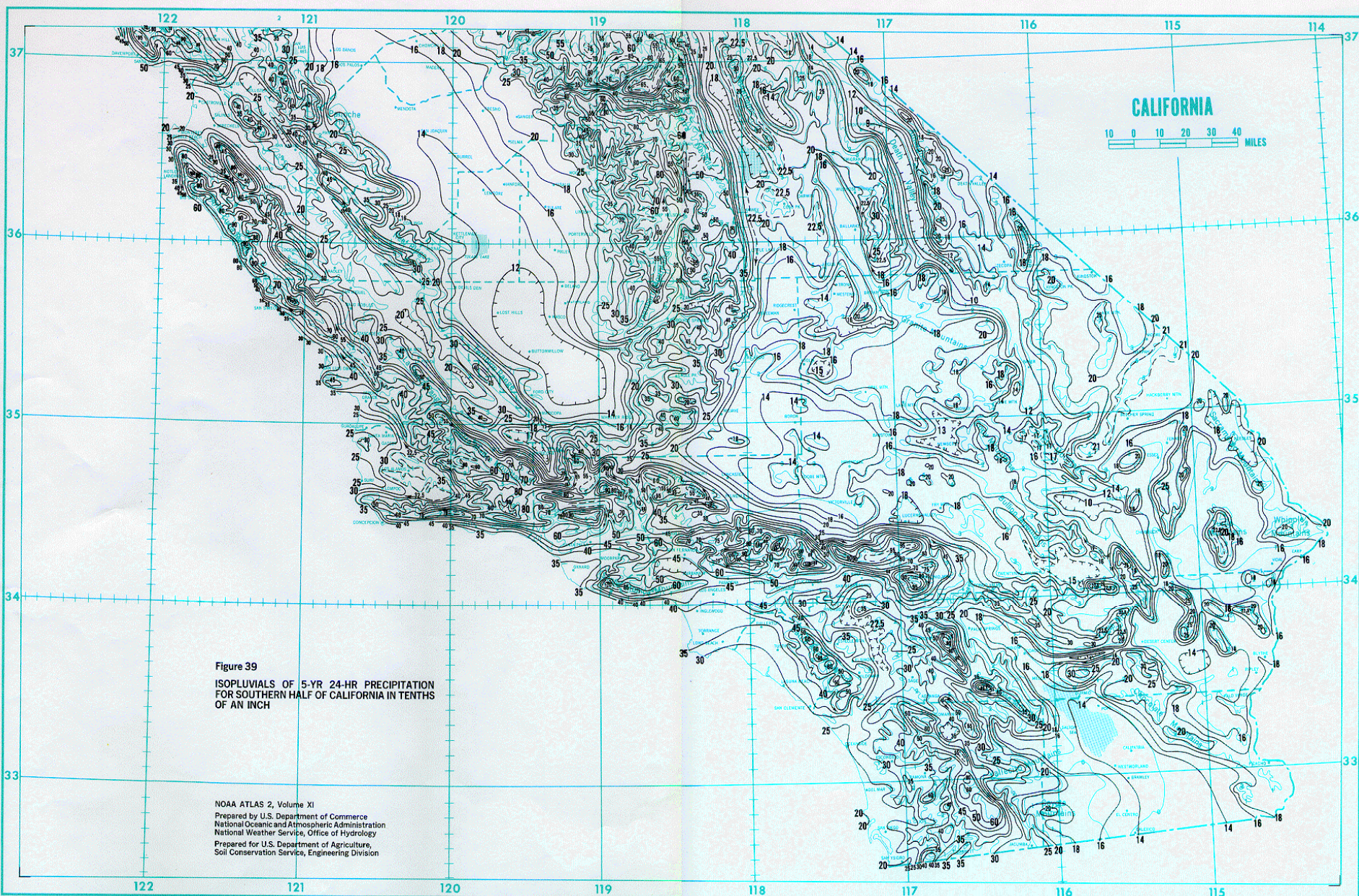
Risk Level	LUP Type
1	1
2	2
3 *	3 *

NEL Violation Report Requirements

- Analytical method(s), reporting units, detection limit(s), parameter
- Date, time of sampling, place, visual observations (inspections), and measurements including precipitation
- Description of the current BMPs associated with the effluent sample that exceeded the NAL and the proposed corrective actions.
- Compliance Storm Exemption
 - **Get out of jail free card:** if an NEL was exceeded during a storm equal to or greater than a Compliance Storm Event
 - Risk Level 3 dischargers shall report on site rain gauge reading and nearby governmental rain gauge reading for verification



Compliance Storm Determination



Compliance Storm Determination

- <http://www.wrcc.dri.edu/pcpnfreq/nca5y24.gif>
- <http://www.wrcc.dri.edu/pcpnfreq/sca5y24.gif>

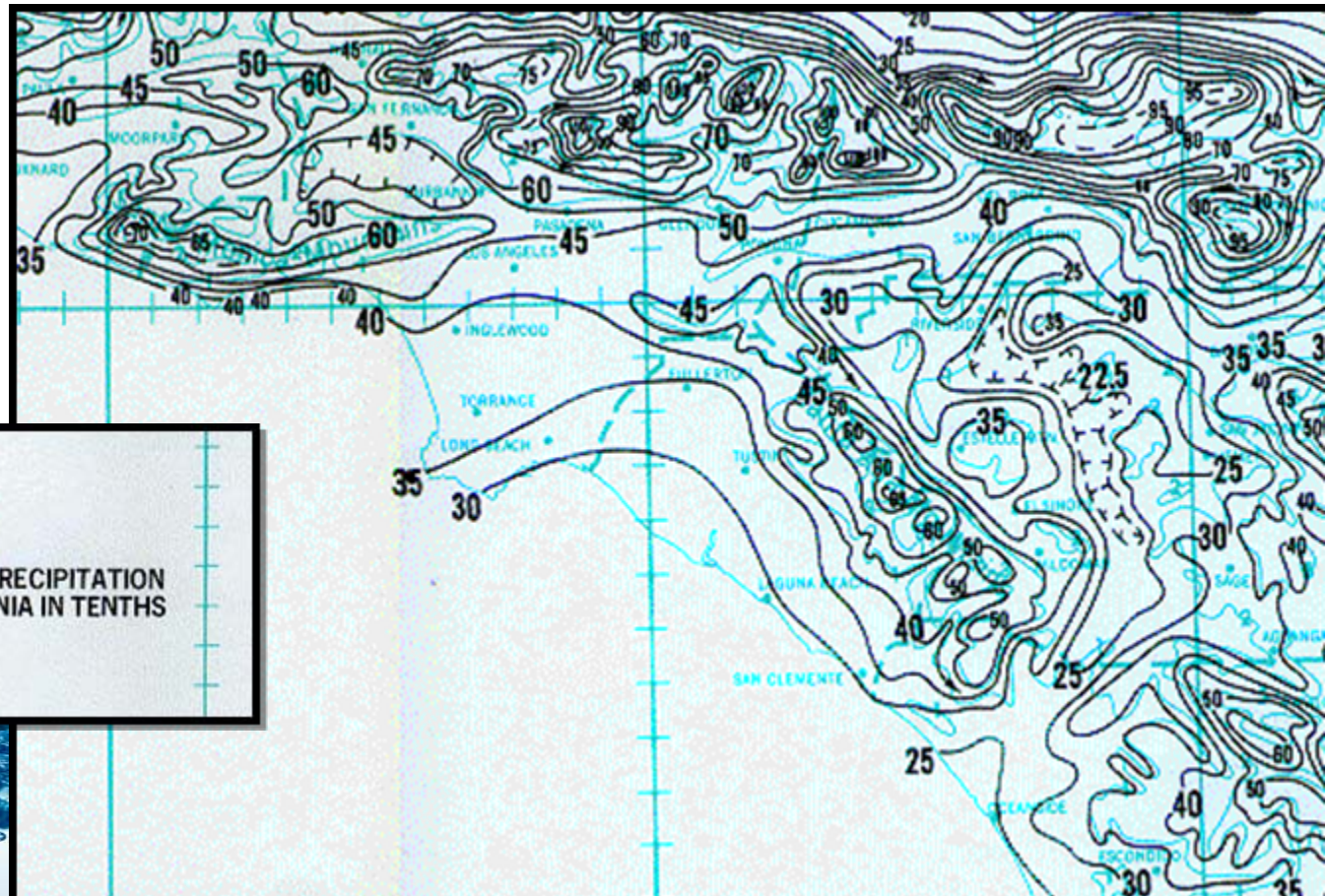


Figure 39

ISOPLUVIALS OF 5-YR 24-HR PRECIPITATION
FOR SOUTHERN HALF OF CALIFORNIA IN TENTHS
OF AN INCH

Risk Level		LUP Type
1	*	1
2	*	2
3	*	3

Quarterly Non-Storm Water Reports

- Dischargers shall visually observe (inspect) each drainage area for the presence of unauthorized and authorized non-storm water discharges and their sources.
 - January-March
 - April-June
 - July-September
 - October-December

Quarterly Non-Storm Water Reports

Report shall document:

Risk Level	LUP Type
1 *	1
2 *	2
3 *	3

- Presence or evidence of non-storm water discharge
 - (authorized or unauthorized)
- Pollutant characteristic and source
 - (floating, suspended, sheen, discoloration, odor...)

Risk Level	LUP Type
1 *	1
2 *	2
3 *	3

Quarterly Non-Storm Water Reports

All Risk level dischargers shall maintain on-site records that include

- Personnel performing inspections
- Dates and times inspection occurred
- Responses taken to eliminate unauthorized non-storm water discharges
- Efforts made to reduce or prevent pollutants contact with non-storm water discharges

Risk Level	LUP Type
1	1
2 *	2
3 *	3

Quarterly Non-Storm Water Reports

Risk level 2 & 3 sites

- Shall sample effluent at all discharge points where non-storm water is discharged off site
- Dischargers shall send all non-storm water sample analyses to a laboratory certified for such analyses by the State Dept of Health Services
- Shall monitor & report run on from surrounding areas if it contributes to exceedance of NAL's or NEL's for risk level 3

Annual Reporting Requirements

Risk Level	LUP Type
1 *	1 *
2 *	2 *
3 *	3 *

- All dischargers shall prepare & electronically submit an Annual Report.
- Reporting period is July 1 – June 30 each year.
- Reports due no later than September 1st of each year.
- First Annual Report will be due September 1, 2011
- SMARTS Annual Report function is not built yet

Annual Reporting Requirements

Risk Level	LUP Type
1 *	1 *
2 *	2 *
3 *	3 *

- Annual Report must be certified by the LRP or AS
- The LRP shall list in the SWPPP the name of any Approved Signatory and provide a copy of the written agreement or other mechanism that provides this authority from the LRP
- Active projects >3 months must file Annual Report
- Concern over contractor leaving? Don't wait for September 1 to file AR

Annual Reporting Requirements

Risk Level	LUP Type
1 *	1 *
2 *	2 *
3 *	3 *

- The discharger shall retain a copy of Annual Report for a minimum of three years after the date the report is filed
- Copies can be electronic or paper

Annual Reporting Requirements

CGP states Annual Report shall include:

1. Summary & evaluation of all sampling & analysis
2. Analytical method(s), reporting units, and detection limits
3. Summary of all corrective actions taken
4. Identification of compliance activities or corrective actions that were not implemented

Annual Reporting Requirements

5. Summary of all violations of the General Permit
6. Names of those who performed inspections and or tested / collected samples
7. Date, time, place of inspections, sampling, measurements including precipitation
8. Visual observation & sample collection exception records

Annual Reporting Requirements

The Discharger shall provide training information in the Annual Report consisting of:

9. Documentation of all training for individuals responsible for all activities associated with compliance with the CGP
10. Documentation of all training for individuals responsible for BMP installation, inspection, maintenance, and repair
11. Documentation of all training for individuals responsible for overseeing, revising, and amending the SWPPP

Annual Reporting - Specifics

Items required in Annual Report format:

- General info (owner, developer, site...)
- SWPPP
 - Was the SWPPP prepared by QSD?
 - Was the SWPPP located on site?
- BMP Evaluation
 - Erosion controls, Sediment controls

Annual Reporting

Items required in Annual Report format:

- Inspections
 - Were weekly site inspections conducted?
 - Were all site inspections performed or supervised by QSP?
 - Did inspection form contain all required information?
 - Did BMP repairs/replacement occur within 72 hours?
- Storm Event Monitoring
 - Were all inspections completed within 2 business days?
- REAP
 - Were REAPs developed 48 prior to all likely precipitation events?

Annual Reporting

Items required in Annual Report format:

- Sampling and Analysis Results (Risk 2 & 3)
 - How many qualifying storm events occurred?
 - How many were samples taken for?
 - How many storm water discharge locations?
 - Were PH and Turbidity samples taken for all...?
- Quarterly Non-Storm Water Inspection Results

Annual Reporting

Items in Annual Report format:

- NAL Exceedances (Risk 2 & 3)
 - Were any NALs exceeded this reporting year?
 - Were corrective actions taken?
- NEL Violations (Risk 3)
 - Were there any NEL violations this reporting year?
 - Were NEL exceedances due to storm event equal to or larger than the Compliance Storm Event?
 - Were NEL violation reports submitted to State Water Board within 24 hours?

Annual Reporting

Items required in Annual Report format:

- Training
 - Was a QSP in reasonable charge of SWPPP implementation?
- Bioassessment – (Risk Level 3)
- Records
 - Are all records of storm water monitoring information retained on site?

Monitoring Quick Reference Risk Level 1

Table 1- Summary of Monitoring Requirements

Risk Level	Quarterly Non-storm Water Discharge	Visual Inspections				Sample Collection	
		Pre-storm Event Baseline	REAP	Daily Storm BMP	Post Storm	Storm Water Discharge	Receiving Water
1	X	X		X	X		



Monitoring Quick Reference

Risk Level 2

Table 2- Summary of Monitoring Requirements

Risk Level	Quarterly Non-storm Water Discharge	Visual Inspections				Sample Collection	
		Pre-storm Event Baseline	REAP	Daily Storm BMP	Post Storm	Storm Water Discharge	Receiving Water
2	X	X	X	X	X	X	

Monitoring Quick Reference

Risk Level 3

Table 2- Summary of Monitoring Requirements

Risk Level	Quarterly Non-storm Water Discharge	Visual Inspections				Sample Collection	
		Pre-storm Event		Daily Storm BMP	Post Storm	Storm Water Discharge	Receiving Water
3	X	Baseline	REAP	X	X	X	X ⁴

⁴ When NEL exceeded



Monitoring Quick Reference LUP

Table 3. LUP Summary of Monitoring Requirements

LUP Type	Visual Inspections				Sample Collection		
	Daily Site BMP	Pre-storm Event	Daily Storm BMP	Post Storm	Storm Water Discharge	Receiving Water	Non-Visible (when applicable)
		Baseline					
1	X						X
2	X	X	X	X	X		X
3	X	X	X	X	X	X	X

Questions and Discussion