

My Facility is in Level 1 – Now What?

A step-by-step guide to Level 1 Exceedance Response Actions (ERAs)



October 1: Complete Level 1 ERA Evaluation

The evaluation consists of the following:

- Comprehensive review of the SWPPP and site tour,
- Evaluate pollution sources that may contribute to NAL exceedance(s),
- Identify necessary BMP additions or modifications,
- Train appropriate employees,
- Ensure internal procedures are in place to track BMPs as designed in the SWPPP.

Before June 30: Goal – Return to Baseline!

Your stormwater results will determine whether your facility may return to Baseline status or advance to Level 2:

- **Baseline:** Four (4) consecutive QSEs indicating no additional NAL exceedances for that parameter.
- **Level 2:** NAL exceedances occur during the next reporting year for the same parameter(s).



July 1: Appoint a QISP

- If your facility had an NAL exceedance during the previous compliance year, you are in Level 1 status. Verify your status is correctly indicated in SMARTS.
- Facilities in Level 1 are required to appoint a Qualified Industrial Stormwater Practitioner (QISP, pronounced *kwisp*) to conduct a Level 1 ERA Evaluation and Report.

Before January 30: Submit Revised SWPPP

- Submit and certify any SWPPP revisions via SMARTS no later than 30 days upon revision.

January 1: Submit Level 1 ERA Report

- Submit and certify a QISP-prepared Level 1 ERA Report via SMARTS.
- Implement any necessary BMP additions or modifications.

Have you exceeded a Numeric Action Level (NAL)?

Let's make sure. Did one of the following occur?

- **Instantaneous NAL Exceedance:** When **2 or more** results for the same parameter exceed the Instantaneous Max NAL value (TSS and Oil & Grease) or is outside the allowable range (pH).
- **Annual Average NAL Exceedance:** When the **average of all** results for the same parameter exceed the Annual Average NAL value.

Need Help? Give ALG a Call!

If your stormwater results indicate one of these NAL exceedances occurred, you will begin Level 1 status on July 1st. Our experienced and highly trained Stormwater Practitioners have years of experience helping facilities to implement cost-effective BMPs designed to meet NALs. 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@algcorp.com.