

IGP Level 2 and What's Due

If it's your second reporting year with elevated results above the NALs, the time for action is NOW.

What is Level 2?

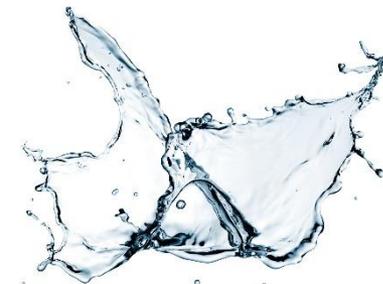
If your site was previously in Level 1 and continued to have numeric action level (NAL) exceedances for a Level 1 parameter last year, your facility entered into **LEVEL 2 STATUS** for that parameter as of July 1st, which requires facilities to fully address their NAL exceedances through specific Level 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, 2021: 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 1/1/2021¹*



July 1, 2020 | Aug | Sept | Oct | Nov | Dec | Jan 1, 2021 | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec | Jan 1, 2022

July 1, 2020: Enter Level 2 Status

- If your site continued to have NAL exceedances for a parameter already in Level 1 status during the 2019-2020 reporting year, you are in **LEVEL 2** status.
- As with Level 1, Level 2 ERA Reports must be completed with the assistance of a Qualified Industrial Stormwater Practitioner (QISP).

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 1st. 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) 358-5256** or jdryden@alcorp.com.

January 1, 2022: 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/BCT².
- 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).

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

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.