My Facility is in Level 1 – Now What?

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



October 1, 2016: Complete Level 1 ERA Evaluation

Using the guidance and assistance of a QISP, complete the following:

- Comprehensive review of the facility and SWPPP
- 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

June 30, 2017: 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 pollutant(s)



- If your facility had an NAL exceedance during the 2015-2016 reporting year, you are in Level 1 status
- Facilities in Level 1 are required to appoint a
 Qualified Industrial Stormwater Practitioner
 (QISP, pronounced kwisp) to provide guidance
 and prepare a Level 1 ERA evaluation and report

January 1, 2017: Submit Level 1 ERA Report

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

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.
 This applies only to Total Suspended Solids and Oil and Grease.
- 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.

