



## Industrial Stormwater General Permit: What is a No Exposure Certification? Do you qualify for it?

On April 1, 2014, the State Water Board reissued the *Industrial Stormwater General Permit* (IGP), which regulates stormwater discharges from industrial activities. You can find the new permit here: [www.waterboards.ca.gov/board\\_decisions/adopted\\_orders/water\\_quality/2014/wqo2014\\_0057\\_dwq.pdf](http://www.waterboards.ca.gov/board_decisions/adopted_orders/water_quality/2014/wqo2014_0057_dwq.pdf).

If you are a regulated facility,<sup>1</sup> there are two pathways to obtain coverage under the IGP. You can either obtain full permit coverage, or, if your facility qualifies, you can obtain a No Exposure Certification (NEC).

### **What is a No Exposure Certification?**

Simply put, a NEC is a statement from the facility owner certifying that the site is managed such that it has no potential to pollute stormwater.

### **Who qualifies for it?**

The NEC is an option for all regulated facilities if you qualify. Your facility qualifies for this simple type of coverage if it is operated in such a way that no industrial processes, pollutants, or materials are exposed to stormwater. See the reverse side for a discussion of the assessment and Best Management Practices (BMPs) you can use to meet NEC requirements.

Your obligations under the NEC include:

- Eliminate all unauthorized non-stormwater discharges such as spills, leakage, and dumping.
- Protect all industrial materials and activities from exposure to rain and/or any runoff by providing a storm-resistant shelter.
- Inspect and evaluate the facility annually and keep records of such evaluations.
- Certify annually that the facility continues to meet NEC requirements.
- Pay an annual fee.

A storm-resistant shelter is a completely roofed and walled structure. Structures with only a top cover but no side coverings may qualify provided that there is no stormwater discharged from within the structure and stored materials cannot be blown, tracked, or washed out (saw dust, powders, etc.).

### **How do I sign up?**

To sign up for the NEC, you have to submit the following information online, at <https://smarts.waterboards.ca.gov/> **by October 1, 2015**, and pay the NEC fee. The Regional Water Board will review your NEC and will inform you if it disagrees with your determination.

- NEC Form and signed certification statement.
- NEC Checklist showing that the facility was evaluated and meets all the no exposure requirements.
- A site map.

If you are currently regulated by the IGP, but believe you qualify for the NEC, you need to recertify your existing NOI information by July 1, 2015. You have until October 1, 2015, to file the supplemental NEC documentation, but it is recommended you file the NEC documentation as close to July 1 as possible. You will not need to upload a SWPPP when you recertify the NOI if you qualify for the NEC.

### **What if I don't qualify?**

If your site doesn't qualify for a NEC, then you must file for full coverage no later than **July 1, 2015**. Registration is online at <https://smarts.waterboards.ca.gov/>. The Permit Registration Documents include a Notice of Intent, Stormwater Pollution Prevention Plan, monitoring plan, site map, and permit fee. Your continued obligations under the full coverage are more extensive than under the NEC and include frequent site inspections, stormwater sampling, implementation of BMPs, and detailed reporting. If your site is close to meeting the NEC conditions, you should evaluate your facility and implement necessary changes to qualify for the NEC.

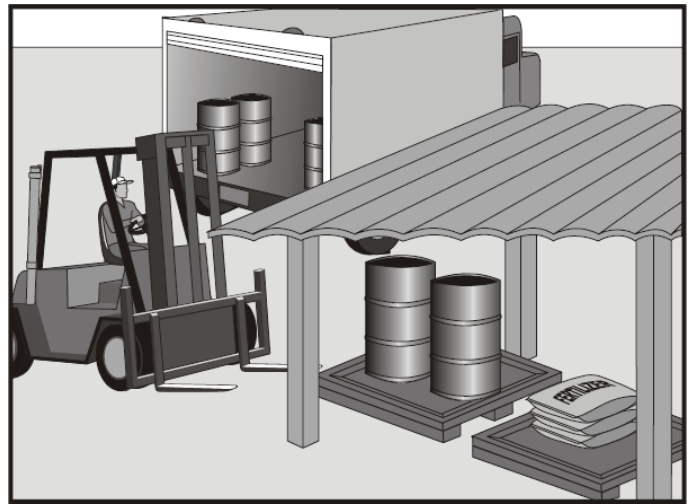
<sup>1</sup> Facilities are regulated based on their Standard Industrial Classification (SIC) code of the activities conducted. A list of the regulated SIC codes is included in Attachment A of the IGP. If you do not know the SIC code for your activities, visit [www.osha.gov/pls/imis/sicsearch.html](http://www.osha.gov/pls/imis/sicsearch.html) for a listing and description of all SIC codes.

# California Stormwater Quality Association

## **Facility NEC Assessment**

To assess NEC applicability, consider these aspects of your facility operations:

- Use, storage, cleaning of equipment
- Use, storage of materials or residuals
- Loading/unloading
- Product storage
- Waste storage
- Condition of outside tanks, drums
- Secondary containment
- Air Emissions



**Remember, if materials or activities can be contacted and mobilized by wind, rain, or runoff, they are exposed.**

## **BMPs to Prevent Exposure**

Depending on site conditions and the type of operations at your facility, no exposure conditions may be achieved by applying a combination of structural and non-structural source control BMPs. A resource for BMPs information is the *CASQA Stormwater BMPs Handbook for Industrial and Commercial Facilities*. For a site to meet no exposure requirements, Source Control BMPs are essential. The Handbook presents a variety of such BMPs that describe approaches to eliminate exposure of materials and activities. The BMP fact sheets offer a variety of options and all the options may not prevent exposure. Specific BMP selection will depend on conditions at your facility. The Handbook is available by subscription and BMP fact sheets can be individually downloaded at [www.casqa.org](http://www.casqa.org).

Low or modest cost BMPs, many of which may already be in place at your facility, may already provide stormwater protection. These include good housekeeping, preventative maintenance, and proper waste handling. To meet NEC requirements, other, more involved practices and controls may be necessary, such as using secondary containment, installing storm resistant shelters, and moving an outdoor operation indoors.

Regardless of the methods selected, to ensure their proper implementation, you should also include employee training and periodic site evaluation as part of your source control BMPs.

### **CASQA Source Control BMPs to Assist Facilities in Meeting NEC Requirements**

SC-10	<i>Non-Stormwater Discharges</i>
SC-11	<i>Spill Prevention, Control, and Cleanup</i>
SC-20	<i>Vehicle and Equipment Fueling</i>
SC-21	<i>Vehicle and Equipment Cleaning</i>
SC-22	<i>Vehicle and Equipment Repair</i>
SC-30	<i>Outdoor Loading/Unloading</i>
SC-31	<i>Outdoor Liquid Container Storage</i>
SC-32	<i>Outdoor Equipment Operations</i>
SC-33	<i>Outdoor Storage of Raw Materials</i>
SC-34	<i>Waste Handling and Disposal</i>
SC-35	<i>Safer Alternative Products</i>
SC-40	<i>Contaminated or Erodible Areas</i>
SC-41	<i>Building and Grounds Maintenance</i>
SC-42	<i>Building Repair and Construction</i>
SC-43	<i>Parking/Storage Area Maintenance</i>
SC-44	<i>Drainage System Maintenance</i>