

# The Monthly Dirt

A monthly newsletter on the Construction General Permit  
by WGR Southwest

## Qualifying Rain Events

Well, the rain season for California has officially started, and many parts of the State have already received their first rain events. As mentioned in the last edition of **The Monthly Dirt**, it's possible that this winter could be unusually wet or unusually dry, depending on how the El Niño plays out. But if California does happen to have a wet winter, you know what that means for active construction sites – more storm event monitoring! Are you up for the job? Here are a few tips to help you brush up on what needs to be done for each Qualifying Rain Event.

First off, what does the Construction General Permit have to say about Qualifying Rain Events? According to Appendix 5 of the CGP (2009-0009-DWQ), a Qualifying Rain Event is defined as *“Any event that produces 0.5 inches or more precipitation with a 48 hour or greater period between rain events.”* What does this mean for construction sites? As far as storm water sampling goes, only Risk Levels 2 and 3 need to regularly test storm water samples. Risk Level 1 sites are not required to analyze storm water samples, with the exception of when something happens to trigger non-visible pollutant sampling. But even though Level 1 sites are mostly off the hook when it comes to storm water sampling, there are still a few things that need to be done during each Qualifying Rain Event. Risk Level 1, 2, and 3 projects are all required to perform visual inspections for each Qualifying Rain Event – we refer to these as the pre-, during-, and post-storm inspections. During pre-storm inspections, the QSP is looking for spills, leaks, areas of soil disturbance needing to be covered, BMPs in need of maintenance, and uncontrolled pollutant sources. The mid-storm inspection is

Qualifying Rain Event  
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**“Any event that produces 0.5 inches or more precipitation with a 48 hour or greater period between rain events.”**

mainly looking for BMP failures and pollutants that may be picked up by the storm water runoff. The post-storm inspection seeks to determine if the BMPs were properly implemented and adequate. If any problems are found, the QSP makes sure the project takes appropriate corrective actions for the problems.

So, when are you required to sample? We have found that many people are a little confused about this, so we have devised some helpful “rules of engagement” for storm water sampling:

### RULES OF ENGAGEMENT

- 1. No discharge = no samples.**
- 2. A minimum of 3 samples must be collected for the entire site per day.**
- 3. Every point of discharge must be sampled at least once per day.**

First, no discharge means no samples. Simply put, if there is no water leaving your site, you do not have to sample (by “sample,” we mean field testing pH and turbidity). Secondly, a minimum of 3 samples must be collected for the entire site per day. Thirdly, every point of discharge must be sampled at least once per day.

*(Continued on next page)*

(Continued from Page 1) These last two rules of engagement can be a little confusing at first, but they are actually pretty simple. Basically, you need to collect at least 3 samples each day during a qualifying rain event...whether you have one discharge point, or ten. No matter how many discharge points you have, you need to sample each one of them at least once – see Rule #3. If there are three or more discharge points on your site, following Rule #3 will also fulfill Rule #2. But what happens if you only have two outfalls? Well, according to Rule #2, you will have to sample one of the outfalls twice to get the minimum of 3 samples for the entire site.

Finally, the permit requires that you sample each day of every Qualifying Rain Event. But a qualifying event only applies to events that generate at least 0.5 inches of rain – that’s quite a bit of rain; probably more than will be generated in one day. Since you probably won’t know if the rain event will reach 0.5 inches or not, we recommend that you collect samples from each day of a rain event. If you reach 0.5 inches, then you have met the permit requirements. If the rain event doesn’t end up reaching 0.5 inches and you collected samples anyway, don’t worry – it’s better to be safe than sorry. **MD**

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## Getting Ready for a QRE

Don’t let the rain catch you sleeping. While it is still sunny, take the opportunity to start getting your sampling supplies together. The Construction General Permit requires dischargers to analyze for pH and turbidity in the field, so you will need to have a pH meter and turbidity meter that are working and in good condition. Both meters will need to be calibrated before being used, and remember that calibration standards don’t last forever. If yours have been sitting around since last year, check the expiration date to see if it is expired or soon will be.

Rain gauges are another requirement for active construction sites. How is yours working? Has the Summer heat caused the plastic tube to crack? Are the batteries dead? Check up on the status of your rain gauge and order a new one if needed. Before you get a new one, go back and read January’s issue of **The Monthly Dirt** to see our recommendations for buying a rain gauge.

Also, keep an eye on the weather forecast. Don’t let a Qualifying Rain Event sneak up on you; make a habit of watching the local weather forecast at [www.wrh.noaa.gov](http://www.wrh.noaa.gov) so you will be ready. And keep in mind that if your project is a Risk 2 or 3, you will need to prepare a REAP if there is a 50% or greater probability of rain.

**MD**

## Upcoming Training

Got SWPPP? Classes coming to Lodi:

- ✓ QSP/QSD Training, **December 1-3, 2015**

(For more information about these classes, go to [www.gotswppp.com](http://www.gotswppp.com).)

- ✓ Mark your calendars for the first BMP Roundup event – happening on **November 19, 9AM-3PM** at the WGR Lodi office. See the attached flyer for

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### Storm Water Awareness Week Keynote Sessions

If you missed any of the keynote sessions for Storm Water Awareness Week 2015, you can still watch them (free of charge) by going to [www.stormwaterawareness.org](http://www.stormwaterawareness.org) or clicking on the images below.



< **Jeff McLain and Melanie Okoro**, NOAA Fisheries West Coast Region

> **Laurel Wardrip**, State Water Resources Control Board



< **Michelle Workman and Robyn Bilski**, East Bay Municipal Utilities District

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Please contact us if you have any questions ...

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Technical Questions about Environmental Compliance?

Call ...

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