UNDERSTANDING CORRECTIVE ACTIONS

As required by the Industrial Stormwater General Permit

THE BASICS

You must perform a **corrective action** every time your stormwater sample analysis results are above your **benchmark value**.

A "corrective action" is something you do to address a high level of pollutant in your stormwater, such as investigating the source of the pollution or using a new **best management practice (BMP)** to reduce it.

If you have had more than one exceedance for the same pollutant in one calendar year, you will have to do additional corrective actions, even if they were from different **outfalls**.

LEVEL **1** : OPERATIONAL SOURCE CONTROL BMP

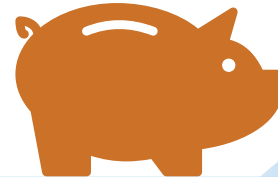### What triggers a Level 1 corrective Action?

If you receive a sample analysis report from your lab that shows pollutant levels above any of your benchmarks, you must complete a Level 1 corrective action within 14 days of receiving the analysis.

How do I address it?

Implement an **operational source control** BMP on your site. Operational source control BMPs are practices that prevent or reduce pollutants from entering stormwater. When you are determining which BMP(s) to implement, make sure you are already following all **mandatory BMPs**.

Examples: form a pollution prevention team, work to prevent spills and clean them up right away, move equipment or materials that can be pollutant sources indoors or under cover.

Operational source control BMPs can be the most cost-effective pollutant minimization strategies. It is easier and cheaper to keep pollutants out of your stormwater than it is to remove pollutants from the water.

RECORDING YOUR ACTIONS (all levels)

- Update your **Stormwater Pollution Prevention Plan (SWPPP)** to reflect changes made as part of corrective actions.

- Your SWPPP must be certified every time it is updated.

- For Level 3 corrective actions, your SWPPP must be certified by a Qualified Industrial Stormwater Professional (a licensed or certified stormwater professional, such as an engineer or environmental consultant)

- Report every corrective action in your **annual report**.

LEVEL **2** : STRUCTURAL SOURCE CONTROL BMP

What triggers a Level 2 Corrective Action?

Reporting an exceedance on your DMR for the same parameter in any two quarters of a calendar year.

> *Source control is removing or covering sources of a pollutant before they become part of stormwater runoff. This is often more effective than trying to remove a pollutant once it is in the stormwater.*
>
> Ecology's guidance for reducing zinc in stormwater runoff, page 1: link.pwi.org/reducezinc

How do I address it?

Implement a **structural source control BMP**. Structural source control BMPs are physical, structural, or mechanical devices or structures that prevent pollutants from entering stormwater. If you believe a source control BMP will not be enough to address the exceedances on your site, you can install a treatment BMP instead.

Examples: constructing a berm to prevent run-on or run-off of stormwater, containing pollutant sources inside of a building or under cover, directing stormwater to treatment BMPs

Things to consider when choosing a source control BMP:

- What parameter was exceeded?
- What are the possible sources on your site?

For an explanation of the mandatory and suggested source control BMPs, refer to the Stormwater Management Manual of Western WA (SWMMWW) Section IV-2.2: link.pwi.org/swmmww-iv-2-2

⚠️ **Important:** A Level 1 corrective action (operational source control BMP) is required each time a benchmark is exceeded, including when a Level 2 corrective action is required.

LEVEL **3** : TREATMENT BMP

What triggers a Level 3 corrective action?

Reporting an exceedance on your DMR for the same parameter in any three quarters of a calendar year.

- If you trigger a Level 3 corrective action, you no longer need to complete a Level 2.
- If you have already started a Level 2 corrective action, you are still required to implement a Level 3 action — unless you can prove that your Level 2 action would effectively treat the exceedances (if so, request a waiver from WA Dept of Ecology).

How do I address it?

Implement a **treatment BMP** that will address the exceedances at your site. Treatment BMPs remove pollutants from stormwater runoff. It may be in your best interest to hire an outside consulting firm to evaluate the site and provide recommendations for your facility.

Examples: oil/water separators, wetpools, biofiltration (such as swales and filter strips), constructed wetlands

If your stormwater treatment system requires site-specific design or sizing you must submit an engineering report to Ecology for review and approval before installation. After installation you must submit an operation and maintenance manual to Ecology.

For more information about treatment BMPs, refer to the Stormwater Management Manual for Western Washington (SWMMWW) Section V-1.4: link.pwi.org/swmmww-v-1-4

⚠️ **Important:** A Level 1 corrective action (operational source control BMP) is required each time a benchmark is exceeded, including when a Level 3 corrective action is required.