



Environmental Compliance Management Services

To: ECM Services Group Stormwater Monitoring Program (GSMP) Members

Re: 2011/2012 Group Stormwater Monitoring Program Memberships & Renewals

It's time to renew your membership in ECM Services' upcoming 2011/2012 Group Stormwater Monitoring Programs (GSMP). If you are not a current member of either the California Auto Dismantlers Group (CADG) or the Wine Makers Group (WMG) programs, ***now is the time to join!***

NOW IS NOT THE TIME TO SHORTCUT YOUR STORMWATER COMPLIANCE RESOURCES

THE 2011-2012 STORMWATER DISCHARGE PERMIT COMPLIANCE REPORTING YEAR WILL BE THE "MAKE OR BREAK" YEAR FOR CALIFORNIA INDUSTRIAL STORMWATER DISCHARGERS

As most of you may know, the State Water Resources Control Board (Water Board) on January 28, 2011 issued a draft of the proposed new Industrial General Stormwater Discharge Permit (2011 draft IGP). After considering public comments received by April 29, 2011, the Water Board intends to reissue a formal final draft IGP later this summer, and which is scheduled to go into effect no later than the 2012-2013 reporting year.

One issue of particular concern with the 2011 draft IGP is the inclusion of "Compliance Levels" in the proposed permit. The ***higher compliance level*** assigned to a regulated industrial discharger, the ***more rigorous and costly permit compliance will be.*** How well industrial dischargers demonstrate compliance with the current stormwater permit, *including the upcoming the 2011-2012 reporting year*, will serve as the basis for determining industrial dischargers' "Compliance Level" under the new Industrial Stormwater Discharge Permit expected to go into effect as early as 2012.

As promised ECM Services has not raised the membership fees for the 2011/2012 year and continue to offer three compliance support service plans for the 2011-2012 GSMPs:

- **Expanded Service Plan (ESP) Option:** The ESP option is ***our most comprehensive***, all inclusive compliance support program designed to accommodate our GSMP members that prefer to have ECM Services assume a greater level of responsibility for documenting the site's compliance with the Industrial General Stormwater Discharge Permit;
- **Standard Service Plan (SSP) Option:** The SSP option is ***our lowest priced*** stormwater compliance support service option where *the GSMP member assumes a greater level of responsibility* for documenting their site's compliance with Industrial General Permit; and
- **Online Service Plan (OSP) Option:** The OSP option is ***our best priced*** stormwater compliance support service option. For our GSMP members that are comfortable with online reporting, the internet and e-mail, the ***OSP option offers the same level of compliance support as the ESP option, but at about the same price of the SSP option.***

Please see the attached **2011-2012 GSMP Renewal Package** for additional service plan option and renewal information.

The State Water Board plans to raise **stormwater permit fees from \$1,008 to nearly \$1,300 in 2011!** We understand how these fee increases affect the way you do business and how important cash-flow is to daily operations. So we are again offering an **Online Monthly Payment Plan** to our GSMP members for the 2011-2012 year.

The Online Monthly Payment Plan will work much the same way it did last year. Monthly installment payments are due by the 15th of each month, starting August 15, 2011, with the final payment due March, 15 2012. **The initial payment fee for new membership and/or renewal applications received after August 15, 2011 will be adjusted so that all monthly payment plans are completed by March 15, 2012.**

Each month we will e-mail you your invoice which will include a link to our *Online Payment* website where payments can be made directly online, at no additional fee. Monthly payments can also be made by credit card through *PayPal* to payments@ecms.com or by check¹. More information about the 2011-2012 Online Monthly Payment Plan option is provided in the attached **2011-2012 GSMP Renewal Package**.

If you have any questions, please do not hesitate to call our offices. We look forward to working with you in the upcoming program year.

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¹ All PayPal fees to be paid by the GSMP member. A \$7.00 per check handling fee will be assessed on any monthly payments made by check. If making monthly payments by check, please remember to include the \$7.00 handling fee with your payment.

The table below summarizes the different level of support between the three programs from the 2011-2012 reporting period:

REQUIREMENT	STANDARD SERVICE PLAN (SSP)	EXPANDED SERVICE PLAN (ESP)	ONLINE SERVICE PLAN (OSP)
NOI PERMIT ASSISTANCE	ECM Services will continue to assist any group participant in preparing and submitting the site's Notice Of Intent (NOI) Application to the State Water Resources Control Board		
GROUP PARTICIPANT COMPLIANCE MANUAL ("SWPPP")	The Compliance Manual is structured to reflect the participant's greater level of responsibility for their site's stormwater compliance documentation	The Compliance Manual is structured to reflect the greater level of responsibly ECM Services assumes for monitoring and demonstrating the site's stormwater compliance	The Compliance Manual is structured to reflect the greater level of responsibly ECM Services assumes for monitoring and demonstrating the site's stormwater compliance
SAMPLING FEES¹	Are not included in the SSP annual program fee. The participant pays for sample collection and analysis costs <i>only in the years the site is scheduled to collect stormwater samples</i>	<i>Are Included</i> in the ESP annual program fee	Are not included in the OSP annual program fee. The participant pays for sample collection and analysis costs <i>only in the years the site is scheduled to collect stormwater samples</i>
SUBMITTAL OF MONTHLY REPORTS TO ECM SERVICES	Are not required. SSP Participants will be responsible for ensuring inspections are conducted. The participants certifies each quarter that specific compliance tasks have been completed by site personnel for the previous 3 months	Participants will continue to submit their stormwater reports and forms to ECM Services once each month. Reports can be submitted using ECM Services' online reporting option, or can be mailed, emailed or faxed to us	Participants will continue to submit their stormwater reports and forms to ECM Services once each month. <i>All stormwater reports must be submitted online only</i>
SAMPLE COLLECTION	Each group participant continues to collect their own stormwater samples, using sampling supplies and equipment provided by ECM Services and in accordance with sampling Instructions provided by ECM Services.		
WEEKLY BMP INSPECTIONS	Continue to conduct and record the Weekly BMP inspections using the reporting forms and following inspection procedures developed and provided by ECM Services. <i>Reports are not to be submitted to ECM Services for review</i>	Continue to conduct and record the Weekly BMP inspections using the reporting forms and following inspection procedures developed and provided by ECM Services and submit to ECM Services each month for review	Continue to conduct and record the Weekly BMP inspections using the reporting forms and following inspection procedures developed and provided by ECM Services. Weekly reports <i>must be submitted weekly and online only</i>

REQUIREMENT	STANDARD SERVICE PLAN (SSP)	EXPANDED SERVICE PLAN (ESP)	ONLINE SERVICE PLAN (OSP)
WET WEATHER AND NON-STORMWATER INSPECTIONS	Participant continues to conduct the Wet Weather and Non-Stormwater Inspections using the reporting forms and following inspection procedures developed and provided by ECM Services. Reports are not to be submitted to ECM Services for review	Participant continues to conduct the Wet Weather and Non-Stormwater Inspections using the reporting forms and following inspection procedures developed and provided by ECM Services and submit to ECM Services each month	Participant continues to conduct the Wet Weather and Non-Stormwater Inspections using the reporting forms and following inspection procedures developed and provided by ECM Services and submit reports each month only online
QUARTERLY AND ANNUAL COMPLIANCE INSPECTIONS	Participants continue to conduct their Quarterly and Annual Compliance Site Inspections using the reporting forms and following inspection procedures developed and provided by ECM Services. Quarterly Reports are to be submitted to ECM Services each quarter for review.	ECM Services prepares the quarterly and annual site compliance reports based on the information provided by the participant on a monthly basis.	ECM Services prepares the quarterly and annual site compliance reports based on the information provided by the participant on a monthly basis
2011/2012 ANNUAL REPORT²	Participants will be provided a partially completed Group Annual Report for their completion, certification and submittal. ECM Services can submit the participant's Annual Report online to the Water Board for a one time fee of \$50	Participants will be provided a completed annual report, limited to the information provided by the participant to ECM Services, for review, certification and submittal. ECM Services can submit the participant's Annual Report online to the Water Board at no additional fee	Participants will be provided a completed annual report, limited to the information provided by the participant to ECM Services, for review, certification and submittal. ECM can submit the participant's Annual Report online to the Water Board for a one time fee of \$50

Notes:

1. GSMP participants are only required to collect two (2) stormwater samples during any five (5) year permit period. Stormwater testing fees typically are about \$200 per sample set. Actual sample costs will vary, depending on location of member sites designated to collect stormwater samples for the 2011-2012 monitoring year;
2. In order for ECM Services to assist you in submitting your Annual Report online, we must receive authorization to do so no later than December 1, 2011.

ECM SERVICES GROUP STORMWATER MONITORING PROGRAM 2011/2012 PARTICIPATION AGREEMENT

- 1.0 ECMS is authorized to proceed with the SCOPE OF SERVICES. We accept the WARRANTY AND LIABILITY, and TERMS AND CONDITIONS, as described in the membership agreement (refer to New Membership at www.ecms.com).
- 2.0 I certify that the information provided for participation in ECM Services Group Stormwater Monitoring Program (GSMP) is correct to the best of my knowledge. If any of the information provided changes or is amended, I will notify ECMS in writing within 30 days of the change.
- 3.0 I understand that, in order to participate in a 2011/2012 ECM Services' GSMP, I will be expected to implement the GSMP Best Management Practices (BMPs) as soon as practical, but no later than 90 days from notification. I also understand that I will be expected to submit to ECM Services all required facility forms and observations as supplied in the GSMP Manual and/or available at www.ecms.com, and in accordance with instructions provided to this facility by ECMS.
- 4.0 I understand that, if my facility is selected as a GSMP sample site, I will sample storm water runoff from my site in accordance with instructions provided to me by ECMS. Further, I understand that, if my facility is scheduled for a Comprehensive Site Compliance Audit, that I and all facility staff/employees will cooperate fully with ECMS with the scheduling and conducting the site audit, including making relevant records and documents available to ECMS staff upon request, as well as providing complete site access to ECMS staff during the site audit.
- 5.0 I understand that, if I fail to comply with the above referenced requirements, and/or fail to remit the 2011/2012 GSMP Participation and/or Sample Fee(s), or any part of the Fee(s), in accordance to the 2011/2012 Service Payment Schedule, ECMS has the option to delete this facility from the 2011/2012 GSMP, and any monies paid to date will be forfeited.

PAYMENT PLAN (CIRCLE ONLY ONE OPTION PLEASE)

Program Option	Annual Renewal Fee ¹	Annual New Member & Monthly Payment Plan Fee ⁴	Online Monthly Payment Plan ³	
			Initial Fee @ Signup ⁵	Monthly (8/15/11-3/15/2012)
Standard Service ²	\$ 975.00	\$ 995.00	\$ 355.00	\$ 80.00/Mth for 8 Mths
Online Service ²	\$ 995.00	\$ 1,050.00	\$ 410.00	\$ 80.00/Mth for 8 Mths
Expanded Service	\$ 1,200.00	\$ 1,275.00	\$ 635.00	\$ 80.00/Mth for 8 Mths

1. Program fee when payment received after June 30, 2011 for returning GSMP members renewing membership.
2. Does not include sample costs. Sample fees will be invoiced separately at cost.
3. A \$7.00 per check handling fee will be assessed on monthly payments made by check. All PayPal fees (i.e., credit card payments) to be paid by GSMP members
4. Annual fee for new members and annual fee for new and/or renewing members electing the Monthly Payment Plan Option
5. For applications received after 8/1/2011, add an additional \$80 for each month after August 2011

Select GSMP:

Auto Dismantlers

Wine Makers

Print Name _____

Date _____

Sign Name _____

Title of Person Signing _____

Company Name _____

Mailing Address _____

Contact Name _____

E-Mail Address of Contact Person _____

Telephone/Fax Numbers _____