



Hanson Bridgett Practice Group Stormwater Program Consultation for Industrial Discharges

Hanson Bridgett's proprietary Stormwater Program Consultation (SPC) provides an integrated legal and operational risk analysis of your industrial stormwater program. This service focuses on your California facilities, but can be easily adapted from an operational perspective for all of your facilities. We will provide a succinct bullet-point analysis of your liabilities with recommendations for cost savings and operational efficiencies. This service is suited for executive teams, legal counsel, and environmental departments.

Why is your Stormwater Program Important?

- Stormwater and other nonpoint discharges are the leading cause of water pollution in the United States
- Increased regulatory scrutiny
 - U.S. EPA has recently set industrial stormwater as a top enforcement priority
- Increased operational costs and liabilities due to new permit requirements in California and other states
 - New requirements on companies to meet lower numeric limits
- Active private enforcement by citizens suits filed against companies
 - In California, approximately two notices of intent to sue are filed every week
- Increased risks associated with outdated or piecemeal stormwater programs

- Acquisitions, cut-backs, and new requirements can strain internal staff

What Are the Benefits of This Service?

- Achieve cost effective review of your stormwater program with discrete and practical action items.
- Communicate with your executive team about company-specific liabilities arising from California's new stormwater permit.
- Improve cost efficiencies by understanding strategies and solutions available to centralize and standardize your stormwater program.

How Does the SPC Work?

- We review your stormwater plans and monitoring data for trends and anomalies.
- We evaluate your programs and operations for potential liabilities and risks.
- We deliver a succinct bullet-point memorandum and presentation with specific recommendations.

What Questions Can the SPC Answer?

- Considering your industry, location and program, is your company a likely target for enforcement actions or a citizen suit based on enforcement priorities and trends?
- What are your company's specific requirements under the new stormwater permit in California?
- What could be the unintended consequences of the new national electronic reporting requirements? How can you minimize these consequences?
- How can your company reduce spending on legal and consulting services by standardizing and centralizing your program to meet stormwater permit requirements in California and other states?
- What operational expenditures could your company be required to assume if it does not meet numeric limits/benchmarks? What are the fines and penalties for non-compliance?

SPC provides an integrated legal and operational risk analysis of your stormwater program.

- What does U.S. EPA's "Next Generation Compliance" policy for stormwater programs on a national basis mean for your company?

How Soon Can SPC be Available?

- We will work with you to establish a specific due date.
- We usually can provide the SPC within three weeks of our engagement.

How Much Does the SPC Cost?

- SPC is offered on a fixed-fee basis.
- Fee ranges from \$5,000 to \$15,000 depending on the number of facilities.

Who Are the Legal and Technical Team Leaders

Hanson Bridgett, LLP is collaborating with Mapistry, Inc. to provide the SPC. Mapistry is a company that has developed a proprietary and nationwide service for stormwater compliance. Both Hanson Bridgett and Mapistry have extensive experience working with private sector, publicly traded companies, and public agencies to help them manage some of the most challenging stormwater programs in the United States. Hanson Bridgett has litigated and

successfully settled numerous citizen suit claims under California's Industrial General Permit. Your SPC team will be:

- Catherine W. Johnson – Partner at Hanson Bridgett, litigation perspective – defended a leading stormwater citizen suit case in federal court, obtained favorable decision on the scope of the permit as it applies to transportation facilities.
- Nathan Metcalf – Partner, Hanson Bridgett, compliance perspective – advises numerous facilities on stormwater programs, both public agencies and private companies; served as environmental and safety manager for private industries.
- Ryan Janoch – Principal, Mapistry – operational perspective – develops and implements stormwater program strategies and solutions nationwide; a licensed engineer and former consultant for private industry.

How Can I Get More Information?

Please contact Catherine W. Johnson at 415-995-5835 or by email at cjohnson@hansonbridgett.com to discuss whether SPC is appropriate for your company.

If SPC is not appropriate for you, we would be pleased to discuss the possibility of representing you under a conventional engagement for legal services.

