Why are We Here?

- To comply with permit requirements for training
- To review municipal permit requirements for commercial/industrial inspections
- To review BMPs applicable to commercial and industrial facilities
Introductions

❖ Your Instructor
  ❖ Chandra Santiago, MPA

❖ Audience Introductions
  ❖ Pretreatment Program Staff
  ❖ Stormwater Program Staff
  ❖ Municipal Facilities Staff
  ❖ Code Enforcement Staff
  ❖ Others

❖ Past Training Experience
  ❖ First Timers
  ❖ Veterans
About Your Instructor

AEI-CASC’s Storm Water Team

- 10,000+ Inspections
- 700+ SWPPPs
- Sampling/Monitoring
- 600+ training classes
  - Over 14,000 Trained
- Extensive resume of municipal services

AEI-CASC Engineering
Are Polluted Waters Really a Problem?

According to the U.S. EPA, Forty percent of all U.S. waters are not fishable or swimmable.
What about me? What about my kids?

- Contact with receiving waters that receive urban runoff has been linked to some nasty diseases:
  - Gastroenteritis
  - Typhoid
  - Dysentery
  - Hepatitis
  - Skin rashes
  - Respiratory infections

- EPA’s 1999 report to congress
Course Outline

- Regulatory Background
- Inspection Protocols for Industrial/Commercial Facilities
- Review of Common Best Management Practices (BMPs)
Can the Feds issue enforcement actions?

- **Yes!** Up to $32,500 Per Day per violation

- “Any person who knowingly violates”...can be fined $10,000 or imprisoned up to 2 years -
  
  - CWA Section 309(c)(4)
The Clean Water Act has other Indirect Impacts

- CWA 1365 gives public the right to sue
- Watchdog Groups and Private Citizens
  - NRDC
  - Baykeepers
  - Other Watchdog Groups
General Industry has their own Permit

- 1991 California’s General Industrial Permit was Adopted
  - Excluded Construction Activity
- 1992 Monitoring Requirements were amended
- 1997 Current Permit

- Look Ahead - 2003 Draft Permit
  - Still waiting on the next generation in the permit.
STATE WATER RESOURCES CONTROL BOARD (STATE WATER BOARD)
WATER QUALITY ORDER NO. 97-03-DWQ
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
GENERAL PERMIT NO. CAS000001 [GENERAL PERMIT]

WASTE DISCHARGE REQUIREMENTS (WDRS) FOR
DISCHARGES OF STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES EXCLUDING CONSTRUCTION ACTIVITIES

The State Water Board finds that:

1. Federal regulations for storm water discharges were issued by the U.S. Environmental Protection Agency (U.S. EPA) on November 16, 1990 (40 Code of Federal Regulations [CFR] Parts 122, 123, and 124). The regulations require operators of specific categories of facilities where discharges of storm water associated with industrial activity (storm water) occur to obtain an NPDES permit and to implement Best Available Technology Economically Achievable (BAT) and Best Conventional Pollutant Control Technology (BCT) to reduce or prevent pollutants associated with industrial activity in storm water discharges and authorized non-storm discharges.

2. This General Permit shall regulate storm water discharges and authorized non-storm water discharges from specific categories of industrial facilities identified in Attachment 1, storm water discharges and authorized non-storm water discharges from facilities as designated by the Regional Water Quality Control Boards (Regional Water Boards), and storm water discharges and authorized non-storm water discharges from other facilities seeking General Permit coverage. This General Permit may also regulate storm water discharges and authorized non-storm water discharges from facilities as required by U.S. EPA regulations. This General Permit shall regulate storm water discharges and authorized non-storm water discharges previously regulated by San Francisco Bay Regional Water Board Order, No.92-11 (as amended by Order No. 92-116). This General Permit excluded storm water discharges and non-storm water discharges that are regulated by other individual or general NPDES permits, storm water discharges and non-storm water discharges from construction activities, and storm water discharges and non-storm water discharges excluded by the Regional Water Boards for coverage by this General Permit. Attachment 2 contains the addresses and telephone numbers of each Regional Water Board office.

3. To obtain coverage for storm water discharges and authorized non-storm water discharges pursuant to this General Permit, operators of facilities (facility operators) must submit a Notice of Intent (NOI), in accordance with the Attachment 3
General Industrial Activities Stormwater Permit

STATE WATER RESOURCES CONTROL BOARD (STATE WATER BOARD)
WATER QUALITY ORDER NO. 97-03-DWQ
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
GENERAL PERMIT NO. CAS000001 (GENERAL PERMIT)
WASTE DISCHARGE REQUIREMENTS (WDRS)
FOR
DISCHARGES OF STORM WATER ASSOCIATED WITH INDUSTRIAL ACTIVITIES
EXCLUDING CONSTRUCTION ACTIVITIES
The General Industrial Activity Permit (GIASP)

❖ Who it Covers:

1. Manufacturing facilities
2. Mining/oil and gas facilities
3. Hazardous waste treatment, storage, or disposal facilities
4. Landfills, land application sites, and open dumps that receive industrial waste
5. Recycling facilities such as metal scrap yards, battery reclaimers, salvage yards, automobile yards
6. Steam electric generating facilities
7. Transportation facilities that conduct any type of vehicle maintenance such as fueling, cleaning, repairing, etc.
8. Sewage treatment plants
9. Certain facilities (often referred to as "light industry") where industrial materials, equipment, or activities are exposed to storm water.
Typical Enforcement Actions Process

- **Verbal Enforcement**
  - Discussion at site or over the phone

- **Notice of Violation**
  - Letter stating violation
  - Date when changes need to be made
  - Date for written response
  - Warns of further enforcement actions

- **Notice of Non-Compliance**
  - $5000 mandatory minimum penalty for failure to respond to two notifications: CWC section 13399.25

- **Administrative Civil Liability**
  - States maximum and assessed penalties
  - Informs of public hearing, waiver of right to a hearing or meeting with Executive Officer
What’s the magnitude of their fines?

Under the Porter Cologne Water Quality Act:

- $10-$20k per day
- + $10-$20 per gallon
- + Cost of their time to inspect
Municipal Permits

With Emphasis on Requirements for Commercial/Industrial Inspections
Municipal Permits

- Municipalities have their own Permits!
- Municipalities within Riverside County are covered by three Regional Water Quality Control Board (RWQCB) issued Permits
  - Santa Ana
  - Colorado River
  - San Diego
covered by Santa Ana RWQCB permit

- County of Riverside
- Beaumont
- Calimesa
- Canyon Lake
- Corona
- Hemet
- Lake Elsinore
- Moreno Valley
- Norco
- Perris
- Riverside
- San Jacinto
- Murrieta
- Riverside County Food Control and Water Conservation District
Municipal Permits

Covered by Colorado River RWQCB Permit

- County of Riverside
- Riverside County Flood Control And Water Conservation District
- Coachella Valley Water District
- Banning
- Cathedral City
- Coachella
- Desert Hot Springs
- Indian Wells
- Indio
- La Quinta
- Palm Desert
- Palm Springs
- Rancho Mirage
Municipal Permits

Covered by San Diego RWQCB Permit

- County of Riverside
- Temecula
- Murrieta
- Riverside County Flood Control and Water Conservation District
Purpose:

Regulates the discharge of “pollutants” in Urban Runoff from:
- Industrial Sites
- Construction sites
- and Urbanized Areas
Common Acronym Definitions

- E/CS – Enforcement/Compliance Strategy
- CAP – Compliance Assistance Program
- DAMP – Drainage Area Management Plan
- NPDES – National Pollutant Discharge Elimination System
- BMP – Best Management Practice
What inspections do municipalities have to do?

IX. MUNICIPAL INSPECTION PROGRAM

- Minimum inspection and enforcement procedures
- Provides criteria for characterizing the significance of violations, prioritizing violations, appropriate response actions and enforcement/compliance responses
- Comprises a framework to standardize the implementation and enforcement of the respective Storm Water Ordinances
- The CAP, through the Riverside County Environmental Health Department, specifically addresses storm water compliance survey/inspections of each facility that must secure a hazardous materials permit for either storing, handling or generating hazardous materials and restaurants.
- Enforce the respective Storm Water Ordinances consistent with the E/CS and revise consistent with the program elements described below.
What do Municipalities have to do for Industrial/Commercial Facilities?

- Inventory Industrial and Commercial Facilities
  - Based on CAP – hazmat permitted, retail food facilities
  - Based on POTW Pre-treatment
- Prioritize the Facilities as high, medium, or low threat to water quality
- Inspect the facilities
- Enforce Local Ordinance and Refer Facilities to RWQCB for GIASP Enforcement
- Train Inspectors
What does the Inventory Include?

The inventory contents shall at a minimum include the relevant site information, outlined in the E/CS:

- facility name (dba), address, city, zip code, mailing address (if different), location reference (such as, GIS coordinates, cross streets, etc.)
- facility contact and phone number,
- SIC(s), State WDID No. (if any),
- APN, and
- site size.
2. Each Permittee shall include in its inventory by the end of October 2004, an inventory of the commercial facilities/companies listed below:

   a. Mobile automobile or other vehicle washing;
   b. Mobile carpet, drape or furniture cleaning;
   c. Mobile high pressure or steam cleaning;
   d. Nurseries and greenhouses;
   e. Landscape and hardscape installation; and,
   f. Other commercial sites/sources that the Permittee determines may contribute a significant pollutant load to the MS4.
How Are Facilities Prioritized?

.Priority evaluation of facilities should be based on:

- type of industrial activities (SIC codes),
- materials or wastes used or stored outside,
- pollutant discharge potential,
- facility size,
- proximity and sensitivity of Receiving Waters,
- frequency of existing inspections, based upon other statutes or regulations, ordinances, or codes, and other factors.

AT A MINIMUM, a high priority classification shall be assigned to: facilities subject to Section 313 of Title III of the SARA of 1986 and facilities with a HIGH POTENTIAL or history of unauthorized, non-storm water DISCHARGES.
How Often Are Inspections Required?

- **Frequency of inspection**
  - **Industrial/Commercial Facilities**
    - **high priority** - to be inspected at least once a year
    - **medium priority** - to be inspected at least once every other year (biannually)
    - **low priority** - to be inspected at least once during the term of this Order.

  “In the event that the industrial facility is found to be in violation of the Co-Permittee’s Storm Water Ordinances the frequency of inspection shall be increased consistent with a compliance schedule determined appropriate by the Co-Permittee and as outlined in the revised E/CS to cause said facility to be brought into compliance.”
What do municipalities have to do for Industrial Facilities?

Per section IX.B

13. The Permittees **NEED NOT INSPECT** Industrial facilities **ALREADY INSPECTED** by Regional Board staff if the inspection was concluded within the time frame specified.
What Do We Inspect for at Industrial Facilities?

Industrial facility compliance surveys and inspections shall at a minimum address the following:

a. Check for **NOI** to comply with the GIASP or other permit issued to an industrial facility;

b. Confirm **compliance with the Storm Water Ordinance**;

c. Check for **Active non-storm water discharges, potential illicit connections, and illegal discharges to the MS4**;

d. **Potential for discharge** of pollutants in Runoff from material storage, vehicle/equipment fueling, maintenance (including washing), waste handling, hazmat handling or storage, delivery or loading docks, or other outdoor work areas;

e. **Implementation and maintenance of appropriate BMPs**
What Do We Inspect For at Commercial Facilities?

6. The commercial facility compliance survey/inspection shall, at a minimum, address the following, consistent with the E/CS:

   a. Commercial activity type(s) and SIC(s);

   b. Compliance with each Co-Permittee's Storm Water Ordinances; If applicable, check for submittal of a NOI to comply with the General Industrial Activities Storm Water Permit or other permit issued by the State or Regional Board; and,

   c. The E/CS.
What Do We Inspect For at Commercial Facilities?

The CAP has been revised to cause compliance surveys/inspections of restaurants within Riverside County that, at a minimum, include the following:

a. Oil and grease disposal to verify these wastes are not discharged onto a parking lot, street or adjacent catch basin;

b. Trash bin areas to verify that these areas are clean, the bin lids are closed, the bins are not filled with liquid, and the bins have not been washed out into the MS4;

c. Parking lot, alley, sidewalk and street areas to verify that floor mats, filters and garbage containers are not washed in those areas and that no wash water is discharged to MS4s from those areas; and,

d. Parking lot areas to verify that they are cleaned by sweeping, not by hosing down, and that the facility operator uses dry methods for spill cleanup.
What Are The Training Requirements?

Co-Permittees will provide training to staff that is involved in the compliance surveys/inspections of industrial/commercial facilities. Staff training will address the requirements of the following:

a. The Storm Water Ordinance;
b. The Riverside County MS4 Permit and the DAMP;
c. The GIASP and any other permit issued to a commercial facility by the State or Regional Board;
d. The E/CS;
e. Pollution prevention plans; and,
f. Implementation and maintenance of appropriate BMPs for commercial sites.
“Who’s the Boss” Question One

Industrial/Commercial inspections should address all, but which of the following?

a) Indoor Restrooms

b) Implementation of BMPs

c) Compliance with SW Ordinance

d) Trash Facilities
“Who’s the Boss” Question Two

Which type of Industrial/Commercial facility would not require inspections?

a) RWQCB inspected facility
b) Manufacturing Facility
c) Restaurant
d) Automobile Repair Shop
What are Non-Storm Water Discharges?

- Water that doesn’t originate from a storm
  - Hydrant Flush Water
  - Hosing, Cleaning or Wash Water
  - Runoff from material storage or receptacles that contain fuel, oil, etc.
  - Septic Waste/Chemical Spills
  - Pet waste/yard waste
  - Food processing waste
What are Illicit Connections and Illegal discharges?

Riv. Co’s Ord. # 754.1

Illicit Connection

- any physical connection to a storm drain system which has not been permitted

Illicit (Illegal) Discharge:

- discharge to the storm drain system that is not composed entirely of stormwater runoff except:
  - discharges made pursuant to an NPDES Permit or otherwise authorized by the SWRCB or RWQCBs

Riverside County Municipal Permit
What are Illicit Connections and Illegal discharges?

Some real world examples…

- Car wash connecting to a storm drain
- Restaurant hosing down mats… washing into street
- Parking lot connection to channel without permit

Law is retroactive

- Applicable to connections and discharges made in the past
What about Enforcement?

Riverside County Municipal Permit

- Commercial Facilities Per section IX.C.8
- Industrial Facilities Per Section IX.B.5
- These are the permit requirements that your agency is required to follow

“Each Co-Permittee shall enforce its Storm Water Ordinance prohibiting nonexempt non-storm water discharges at commercial facilities. Sanctions for noncompliance may include:

- verbal and/or written warnings,
- notice of violation or non-compliance,
- obtaining an administrative compliance, stop work, or cease and desist order, a civil citation or injunction,
- the imposition of monetary penalties or criminal prosecution (infraction or misdemeanor).”

Local ordinances describe the city’s legal authority
What about Enforcement?

- Within 24 Hours, provide oral or email notification to RWQCB of facilities perceived to have an illicit connection/discharge or Emergency Situation.

- Within 10 days, follow-up written report detailing:
  - Nature of situation
  - Corrective actions taken by owner
  - Other relevant information
  - Type of enforcement consistent with E/CS
What about Enforcement?

When a **NON- Emergency Situation** representing a possible violation of the GIASP or other permit issued to an industrial facility:

- Provide written notice to RWQCB within two (2) working days of the location where the incident occurred and describing the nature of the incident.
The purpose of this ordinance is to ensure the future health, safety, and general welfare of County citizens by:

A. Reducing pollutants in stormwater discharges to the maximum extent practicable;

B. Regulating illicit connections and discharges to the storm drain system; and

C. Regulating non-stormwater discharges to the storm drain system.
ARTICLE I section 3.I

Pollutant shall mean anything which causes the deterioration of water quality such that it impairs subsequent and/or competing uses of the water. Pollutants may include but are not limited to paints, oil and other automotive fluids, soil, rubbish, trash, garbage, debris, refuse, waste, fecal coliform, fecal streptococcus, enterococcus, heavy metals, hazardous waste, chemicals, fresh concrete, yard waste from commercial landscaping operations, animal waste, materials that result from the process of constructing a building or structure, nauseous or offensive matter of any kind.

Covers pretty much everything
ARTICLE II

MANAGEMENT AND DISCHARGE CONTROLS

Section 1. Reduction of Pollutants in Stormwater.

A. General. It is a violation of this ordinance to throw, deposit, leave, maintain, keep, or permit to be thrown, deposited, placed, left or maintained, any pollutant in or upon any street, alley, sidewalk, storm drain, inlet, catch basin, conduit or other drainage structures, business place, or upon any public or private plot of land in the County. The only exception being where such pollutant is temporarily placed in an appropriate container with a spill containment system for later collection and removal. It is a violation of this ordinance to cause or permit any dumpster, solid waste bin, or similar container to leak such that any pollutant is discharged into any street, alley, sidewalk, storm drain, inlet, catch basin, conduit or other drainage structures, business place, or upon any public or private plot of land in the County.
Would this be considered a pollutant?

Pollutants may include but are not limited to paints, oil and other automotive fluids, soil, rubbish, trash, garbage, debris, refuse.....
It is a violation of this ordinance to.... Leave.... any pollutant in or upon any public or private plot of land.... The only exception being where such pollutant is temporarily placed in an appropriate container with a spill containment system...
It is a violation of this ordinance to deposit, leave, maintain, keep… upon any street…

It is a violation of this ordinance to cause or permit any dumpster, solid waste bin, or similar container to leak such that any pollutant is discharged into any street….
What’s my ordinance?

Some Examples

- County of Riverside 754.1
- Beaumont 763
- Calimesa 95-17 (Chapter 5.5 of Muni code)
- Canyon Lake 64 (Chapter 15.01 of Muni code)
- Corona Chapter 8.04 of City Code
- Hemet 1531 (Sec 14-422---14-470)
- Lake Elsinore 1004
- Moreno Valley 498
- Norco 715 (Chapter 15.80 of Muni code)
- Perris 1018
- Riverside 6232 (Chapter 14.12 of Muni code)
- San Jacinto 1025 (Chapter 13.44 of Muni code)
- Murrieta 177-97 (Chapter 8.36 of Muni code)
What teeth do the cities have?

⇒ Ordinances vary from city to city:

⇒ City of Beaumont Example:

⇒ 1<sup>ST</sup> offense…..$100.00 (and optional misdemeanor)

⇒ 2<sup>nd</sup> offense…..$200.00

⇒ 3<sup>rd</sup> offense…..$1,000.00 and/or 6 months in jail

⇒ Other options: permit revocation

Read your ordinance!
What Do We Need To Know About the GIASP?

✦ General Requirements:

✦ The implementation of management measures
  • To achieve the performance standard of best available technology economically achievable (BAT) and Best conventional pollutant control technology (BCT).

✦ Develop of a Storm Water Pollution Prevention Plan (SWPPP) and a monitoring plan.
  • SWPPP must identify
    – Sources of pollutants
    – The means to manage the sources to reduce storm water pollution
The General Permit is intended to cover all facilities described in Attachment 1, whether the facility is primary or is auxiliary to the facility operator's function.

For example, although a school district's primary function is education, a facility that it operates for vehicle maintenance of school buses is a transportation facility that is covered by this General Permit.
General Industrial Activities
Stormwater Permit

Attachment 1

FACILITIES COVERED BY THIS GENERAL PERMIT

Industrial facilities include Federal, State, municipally owned, and private facilities from the following categories:


2. MANUFACTURING FACILITIES: Standard Industrial Classifications (SICs) 24 (except 2434), 26 (except 265 and 267), 28 (except 283 and 285) 29, 311, 32 (except 322), 33, 3441, and 373.

3. OIL AND GAS/MINING FACILITIES: SICs 10 through 14 including active or inactive mining operations (except for areas of coal mining operations meeting the definition of a reclamation area under 40 CFR 434.11(1)) because of performance bond issued to the facility by the appropriate Surface Mining Control and Reclamation Act (SMCRA) authority has been released, or except for area of non-coal mining operations which have been released from applicable State or Federal reclamation requirements after December 31, 1977; oil and gas exploration, production, processing, or treatment operations; or transmission facilities that discharge storm water contaminated by contact with or on that has come into contact with any overburden, raw material, intermediate products, finished products, by-products, or waste-products located on the site of such operations. Inactive mining operations are mined sites that are not being actively mined but which have an identifiable facility operator. Inactive mining sites do not include sites where mining claims are being maintained prior to disturbances associated with the extraction, beneficiation, or processing of mined material; or sites whose minimal activities are undertaken for the sole purpose of maintaining a mining claim.

4. HAZARDOUS WASTES TREATMENT, STORAGE, OR DISPOSAL FACILITIES: Includes those operating under interim status on a general permit under Subtitle C of the Federal Resource Conservation, and Recovery Act (RCRA).

5. LANDFILLS, LAND APPLICATION SITES, AND OPEN DUMPS: Sites that receive or have received industrial waste from any of
the facilities covered by this General Permit, sites subject
to regulation under Subtitle D of RCRA, and sites that have
accepted wastes from construction activities (construction
activities include any clearing, grading, or excavation that
results in disturbance of five acres or more).

6. RECYCLING FACILITIES: SICs 5015 and 5093. These codes
include metal scrapyards, battery reclaimers, salvage yards,
motor vehicle dismantlers and wreckers, and recycling
facilities that are engaged in assembling, breaking up,
sorting, and wholesale distribution of scrap and waste
material such as bottles, wastepaper, textile waste, oil
waste, etc.

7. STEAM ELECTRIC POWER GENERATING FACILITIES: Includes any
facility that generates steam for electric power through the
combustion of coal, oil, wood, etc.

8. TRANSPORTATION FACILITIES: SICs 40, 41, 42 (except
4221-25), 43, 44, 45, and 5171 which have vehicle
maintenance shops, equipment cleaning operations, or airport
deicing operations. Only those portions of the facility
involved in vehicle maintenance (including vehicle
rehabilitation, mechanical repairs, painting, fueling, and
lubrication) or other operations identified herein that are
associated with industrial activity.

9. SEWAGE OR WASTEWATER TREATMENT WORKS: Facilities used in
the storage, treatment, recycling, and reclamation of
municipal or domestic sewage, including land dedicated to
the disposal of sewage sludge that are located within the
confines of the facility with a design flow of one million
gallons per day or more or required to have an approved
pretreatment program under 40 CFR Part 403. Not included
are farm lands, domestic gardens, or lands used for sludge
management where sludge is beneficially reused and which are
not physically located in the confines of the facility, or
areas that are in compliance with Section 405 of the Clean
Water Act.

10. MANUFACTURING FACILITIES WHERE INDUSTRIAL MATERIALS,
EQUIPMENT, OR ACTIVITIES ARE EXPOSED TO STORM WATER:
SICs 20, 22, 23, 2433, 25, 265, 267, 27, 283, 285, 30,
31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except
373), 38, 39, and 4221-4225.
10. MANUFACTURING FACILITIES WHERE INDUSTRIAL MATERIALS, EQUIPMENT, OR ACTIVITIES ARE EXPOSED TO STORM WATER: SICs 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39, and 4221-4225.

11. MANAGEMENT: Where storage of hazardous wastes is involved, the wastes are not physically located in the confines of the facility, or areas that are in compliance with Section 405 of the Clean Water Act.
Category 10 Dischargers

Facility operators of Category 10 (light industry) facilities are not subject to the GIASP if they can certify:

1. All prohibited non-storm water discharges have been eliminated or otherwise permitted.

2. All areas of past exposure have been inspected and cleaned, as appropriate.

3. All materials related to industrial activity including waste materials) are not exposed to storm water or authorized non-storm water discharges.

and…
Category 10 Dischargers

4. All industrial activities and industrial equipment are not exposed to storm water or authorized non-storm water discharges.

5. There is no exposure of materials associated with industrial activity through other direct or indirect pathways such as particulates from stacks and exhaust systems.

6. There is periodic re-evaluation of the facility to ensure Conditions 1, 3, 4, and 5 are continuously met.
Category 10 Dischargers

- Currently, facility operators that can certify that the above conditions are met are not required to notify the State Water Board or Regional Water Board. These facility operators are advised to retain such certification documentation on site.

- New permit will require all facilities with covered SIC codes that could require coverage to at a minimum file certification for “No Exposure”
DISCHARGES NOT COVERED BY THIS GENERAL PERMIT

- CONSTRUCTION ACTIVITY
- FACILITIES WHICH HAVE NPDES PERMITS CONTAINING STORM WATER PROVISIONS
- FACILITIES DETERMINED INELIGIBLE BY REGIONAL WATER BOARDS
- MINING AND OIL AND GAS FACILITIES
- FACILITIES ON INDIAN LAND
DISCHARGES NOT COVERED BY THIS GENERAL PERMIT

- FACILITIES WHICH DO NOT DISCHARGE STORM WATER TO WATERS OF THE UNITED STATES:
  - FACILITIES THAT DISCHARGE STORM WATER TO MUNICIPAL SANITARY SEWER SYSTEMS
  - FACILITIES THAT DO NOT DISCHARGE STORM WATER TO SURFACE WATERS OR SEPARATE STORM SEWERS

- MOST SILVICULTURAL ACTIVITIES
Let’s look at an example of a facility covered by the GIASP

- A school district is generally assigned a SIC code of 82XX. However, if they operate a school bus maintenance shop, that part of the facility is covered by the GIASP.

- A school district that has a school bus maintenance shop is covered by the GIASP.

- Only that part of the facility conducting the industrial activity described by the SIC is covered by the GIASP.
How Do We Enforce the GIASP?

- Not all industrial/commercial facilities require coverage under GIASP.

- If GIASP coverage is required, the permittees refer the following items to the RWQCB:
  - failure to obtain coverage under the GIASP (NOI),
  - failure to keep a SWPPP at the commercial facility,
  - observed acts or omissions that suggest failure to comply with the GIASP,

- No further action with regard to securing compliance with the GIASP.
What’s an NOI?

- Notifies State that discharger intends to Comply With the GIASP
- Simple Form With Facility Info and Site Map
- Discharger Submits With Fee:
  - Annual fee of $700 plus $130 ambient water monitoring surcharge for total $830
- Discharger receives a WDID # - This is proof that a NOI was filed!
What's a SWPPP?

- The city/county inspectors will now be confirming that facilities have a SWPPP on the site.

- Template available online:
  
  [http://www.floodcontrol.co.riverside.ca.us/stormwater/](http://www.floodcontrol.co.riverside.ca.us/stormwater/)
The Key Message in Each Permit

- Prevent Pollution in Storm Water
- “Only Rain in The Drain”
- Prevent Non-Storm Water Discharges
- Municipal Commercial and Industrial Inspection Staff have stormwater responsibilities
- It’s your job to contribute to keeping our waters healthy!
We're done with that section!!!!!
GENERAL ENTRY PROCEDURES Your agency’s procedures may vary.

- Present your credentials to a responsible facility owner/operator, whether or not identification is requested.
- Explain the purpose of the inspection and appropriate laws and regulations that mandate the inspection requirement.
- The facility owner/operator must consent to the inspection. If the inspector is allowed to enter, entry is considered voluntary and consequential. The absence of an expressed denial can be considered authorization to continue the inspection.
- Do not sign any type of “waiver”, “visitor release’ or document with restrictive conditions that would relieve the facility owner/operator of responsibility for injury or limit your rights to use information obtained during the inspection. Explain that you cannot sign the form and request a blank sign-in sheet.
GENERAL ENTRY PROCEDURES Your agency’s procedures may vary.

🌟 If the owner/operator denies entry, ask why. Tactfully probe the reason(s) for denial. In some cases, diplomacy and discussion may be sufficient to overcome the owner/operator’s reluctance. Be careful to avoid saying something that can be misconstrued as a threat such as discussing potential penalties. Avoid inflammatory discussions and/or deepening of misunderstandings. Document all conditions and circumstances surrounding the denial for entry such as: facility name and exact address, name and title of who refused entry.

🌟 If the consent is withdrawn during an inspection, follow the same procedure as above. Information obtained prior to the withdrawal of consent is valid.

🌟 If access is denied to some parts of the facility, document the portion of the inspection that could not be performed, the reason for the denial of access, and proceed with the inspection of other areas.
PREPARING FOR THE INSPECTION

- Review existing information and the regulatory history for each site. This would include the review of:
  - database of existing permitted facilities
  - records of illicit discharges,
  - records of violations such as Notices to Comply and Notice of Violations
Inspectors need a basic understanding of the background and requirements of the industrial/commercial site inspection program.

Facility owners/operators will question the need for the inspection and will ask about the specific requirements of the site inspection program.

It is essential that the inspector be prepared to clearly communicate this information, to help develop a rapport with the owner/operator and help the facility come into compliance.

The inspector will likely be the first person to inform the facility owner/operator about the industrial/commercial facilities control program; therefore, they play an essential role in promoting the credibility of the program.
Background Information Inspectors should be prepared to answer:

- What is “stormwater” and “non-stormwater”?
- What is “point source” and “non point source”?
- What is illicit connection?
- What is illicit discharge?
- What is the difference between storm drains and sanitary sewers?

Be able to explain the portion of the NPDES permit that pertains to the industrial/commercial facilities control program.
What is “stormwater” and “non-stormwater”?

- Stormwater means storm water runoff, snow melt runoff, and storm water surface runoff and drainage.
- Non-Storm Water consists of all discharges to and from a storm water conveyance system that do not originate from precipitation events. Non-storm water includes illicit discharges, non-prohibited discharges and NPDES permitted discharges.
- Non-Storm Water Discharge means any discharge to storm sewer systems that is not composed entirely of storm water.
Non-Storm Water Discharges Allowed:

- Permitted by other NPDES permit
- Potable water line flushing
- Rising Groundwater or groundwater infiltration or uncontaminated pumped groundwater
- Irrigation water
- Passive foundation drains and footing drains or water pumped from crawl spaces
- Diverted stream flows
- Air conditioning condensate
- Dechlorinated pool water
- May require BMPs if identified as a source of pollution
What is “point source” and “non point source”?

- **Point source** is any discernible, confined, and discrete conveyance, including, but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operations, landfill leachate collection systems, vessel, or other floating craft from which pollutants are or may be discharged.

- **Non-Point Source** refers to diffuse, widespread sources of pollution, large or small but usually numerous throughout a watershed. Include: urban, agricultural or industrial areas, roads, highways, construction sites, communities served by septic systems, recreational boating activities, timber harvesting, mining, livestock grazing, as well as physical changes to stream channels, and habitat degradation. Can happen any time of year from any source that picks up pollutants and deposits them into storm sewer systems, rivers, lakes, ocean, groundwater, etc.
What is illicit connection?

Any connection to the storm drain system that is prohibited under local, state or federal statutes, ordinances, codes, or regulations. Includes all connections except those permitted.

What is illicit discharge?

Any disposal, either intentionally or unintentionally, of material or waste to land or MS4s that can pollute storm water or create a nuisance. Includes any discharge to MS4 that is not entirely made up of storm water.
What is the difference between storm drains and sanitary sewers?

- **MS4** – conveyance that goes directly to a surface water body (lake, stream, ocean, etc.) normally without treatment or without going a POTW.

- **Sanitary sewer** is a conveyance that usually flows to a POTW for treatment prior to discharge to a water body.
Your City/County procedures will vary.

CONDUCTING THE INSPECTION

- Inspect the facility layout to locate the storm drain system and/or stormwater drainage path, storage areas, process, areas, and heavy equipment wash and maintenance areas, and stormwater sampling locations, if applicable.

- Determine the facility’s impact on stormwater quality. The inspector should answer the following:
  - What is the facility’s potential to impact stormwater quality from pollutant exposure and non-stormwater discharges?
  - Are BMPs effectively applied so that pollutant exposure is minimized and non-stormwater discharges are eliminated?
  - What type(s) of impact does or could the facility have on stormwater quality?
Outdoor Activity Inspection

Answer above questions by observing these areas of activities:

Your City/County procedures will vary.

- Wash and rinsing areas for vehicle and equipment washing
- Outdoor process wash areas
- Processing and manufacturing areas
- Parking areas and access roads
- Maintenance and heavy equipment storage areas
- Waste storage and disposal areas

Your City/County procedures will vary.
Outdoor Activity Inspection

Answer above questions by observing these areas of activities:

Your City/County procedures will vary.

➢ Loading and unloading areas
➢ Material storage areas
➢ Outdoor drainage from inside areas
➢ Vehicle and equipment fueling areas
➢ Stormwater conveyance system including inlets, open channels, ditches, and roof leaders, where safe.
➢ Rooftop equipment areas
Outdoor Activity Inspection

Answer above questions by observing these areas of activities:

**Your City/County procedures will vary.**

- Inspect indoor activities and areas to ensure that pollutants are not spilled, dumped, or allowed to flow outdoors.
- Review the facility’s indoor housekeeping procedures
- Inspect the material handling areas to determine if there is a direct path to storm drains
- Inquire about a spill prevention plan and the facility’s cleanup procedure for a spill
General Inspection Procedures

Your City/County procedures will vary.

- Verify SIC to ensure proper classification
- Fill out the Inspection Form
- Determine what follow up actions are required of the facility owner/operator and set a follow up inspection date.
General Inspection Procedures

Your City/County procedures will vary.

- Identify and inform the facility contact about problems and violation(s), if applicable. Set a follow up inspection date with the facility to verify that necessary BMPs had been implemented to correct the identified problems.

- Discuss and distribute appropriate BMP information, public education material. See Section on BMP Implementation.
The inspectors would determine if the facility is in compliance with the County/City Stormwater Ordinance (i.e. there are no unpermitted non-stormwater discharges and pollutant exposure to rain is minimized).

Document the inspection.

Inform the facility owner/operator of expectations/requirements.
### Permittee Inspection Checklists

### Example NPDES Stormwater Inspection Program

#### NPDES STORMWATER INSPECTION FORM

<table>
<thead>
<tr>
<th>Facility Name (dba)</th>
<th>Address (site)</th>
<th>City</th>
<th>Zip</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>Location Reference (GIS, cross streets)</th>
<th>Mailing Address (if different from site)</th>
<th>Facility Contact</th>
<th>Contact Phone</th>
</tr>
</thead>
</table>

<table>
<thead>
<tr>
<th>State WIR No. (if any)</th>
<th>APN</th>
<th>Site Site</th>
<th>SIC</th>
</tr>
</thead>
</table>

#### INSPECTION CHECKLIST

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
<th>N/A (all facilities)</th>
<th>Yes</th>
<th>No</th>
<th>N/A (restaurant specific)</th>
</tr>
</thead>
</table>

- Does the facility require a NOI to comply with the General Industrial Activities Stormwater Permit? (XLR.4.a)
- Is the facility in compliance with the local stormwater ordinance? (XLR.4.b)
- Are there active non-stormwater discharges, potential illicit connections, and/or illegal discharges to the MS4? (XLR.4.c)
- Is there a potential for discharge from areas of material storage, vehicle or equipment fueling, vehicle or equipment maintenance (including washing), waste handling, hazardous materials handling or storage, delivery areas or loading docks, or other outdoor work areas? (XLR.4.d)
- Are appropriate Best Management Practices (BMPs) implemented and maintained? (XLR.4.e)
- Are there outside areas/spill containment? Check parking lot areas to verify that they are clean and not being swept, not by hosing down, and that the facility operator uses dry methods for spill cleanup. (XLC.3.d)
- Are there other appropriate Best Management Practices? (XLC.3.e)

#### ENFORCEMENT/COMPLIANCE ACTION (reference: Enforcement/Compliance Strategic process, draft DAMF, section 8)

- Education and Information
- Written Warning
- Cease and Desist Order
- Referred to RWQCB
- Verbal Warning
- Notice of Violation
- Administrative Compliance Order

#### INSPECTION CONTACT INFORMATION:

- INSPECTOR:

- SITE OPERATOR:
Inspection Program

❖ Example Inspector Reference Binder

❖ Municipal Permit
❖ GIASP
❖ Ordinance
❖ SICs
❖ BMPs
❖ General Inspection Procedures
Essential Knowledge – Getting More Of It!

- Riverside NPDES/Municipal Stormwater Management Program
  - [http://www.floodcontrol.co.riverside.ca.us/stormwater/](http://www.floodcontrol.co.riverside.ca.us/stormwater/)
- California Storm Water Quality Association Manuals (CASQA)
  - [http://www.cabmphandbooks.com](http://www.cabmphandbooks.com)
Essential Knowledge – Getting More Of It!

- CASQA’s 2003 Handbooks
  - A Great Source of Stormwater Information
- The Handbooks – A 4 Volume Set
- Municipal O&M Staff use these Handbooks the most
  - Industrial and Commercial
  - Municipal
- Municipal O&M Staff may need these Handbooks too
  - New Development and Redevelopment
  - Construction
- Get them at [www.cabmphandbooks.com](http://www.cabmphandbooks.com)
Incorporating pollution prevention into everyday activities at commercial and industrial facilities.
Source Control BMPs

Source Control BMPs for fixed facilities - same for Industrial/Commercial Activities and Municipal Operations:

- SC-10 Non-Storm Water Discharges
- SC-11 Spill Prevention, Control and Cleanup
- SC-20 Vehicle and Equipment Fueling
- SC-21 Vehicle and Equipment Cleaning
- SC-22 Vehicle and Equipment Repair
- SC-30 Outdoor Loading/Unloading
Source Control BMPs

- SC-31 Outdoor Liquid Container Storage
- SC-32 Outdoor Equipment Operations
- SC-33 Outdoor Storage of Raw Materials
- SC-34 Waste Handling and Disposal
- SC-41 Building and Grounds Maintenance
- SC-43 Parking/Storage Area Maintenance
The Permit Requires the Control of Non-Storm Water Discharges

What is Non-Storm Water?

- Water that doesn’t originate from a storm
  - Wash-down Water; cleaning water
  - Septic Waste
  - Vehicle/equipment leaks and spills
  - Process water

IS THIS A VIOLATION?
SC-10 Non-storm Water Discharges

- Post “No Dumping” signs w/800 number
- Stencil storm drains
SC-10 Non-storm Water Discharges

- Never hose down or bury spills
- Regularly inspect and clean up hot spots where illegal dumping and disposal occurs
- Locate and remove illicit connections
- Inventory and inspect each discharge point during dry weather
- Report non-storm water discharges observed during normal daily activities so they can be investigated, contained, and cleaned up or eliminated
SC-11 Spill Prevention, Control and Cleanup

- Store appropriate spill cleanup materials near tank storage area or other liquid storage areas.
- Follow the SPCC Plan
- Use dry clean-up methods such as absorbent but make sure the used absorbent is properly disposed of.
- Use as little water as possible. Use rags or a damp mop.
Used water to wash down area and did not contain the wash water.
Proper Spill Cleanup

Absorbent is used on an oil spill.
Proper Spill Cleanup

Used absorbent material is swept up promptly and disposed of properly.
The most common compliance challenges observed statewide are:

- SC-60 - Housekeeping Practices
- SC-31 - Storage of Hazardous Materials (Working Stock)
- SC-31 - Materials Storage Controls (Hazardous Waste)
- SC-33 - Outdoor Storage of Raw Materials
- SC-20 - Vehicle and Equipment Fueling
- SC-21 - Vehicle and Equipment Pressure Washing
Vehicle Fluid Removal

- Transfer removed fluid to designated storage barrels or tanks as soon as possible.
- Ensure safeguards are installed and maintained, such as oil shut-off valves.
Vehicle Fluid Removal

✿ If required, drain fluid into pan and immediately transfer to designated storage barrel or tank. A larger pan may be placed under the primary collection pan to catch any spills.

✿ Promptly remove drip pan after use.
SC-20 Vehicle and Equipment Fueling
Above Ground Tank Leak and Spill Control BMPs

- Review the Spills Prevention Countermeasures and Control Plan for additional requirements.
- Inspect existing above ground storage tanks, secondary containment and spill containment, and associated valves and piping for corrosion, structural failure, and loose connections.
Above Ground Tank Leak and Spill Control BMPs

Keep an appropriate spill kit near above ground tanks. Include ample absorbent materials, shovel, rags, and plastic bags. Update and replenish the spill kit as changes occur in the types of materials stored.
Above Ground Tank Leak and Spill Control
BMPs

- All spills should be contained immediately.
- Spills should be absorbed using absorbent material or dry mop.
- Place used absorbent material in a waste container and dispose according to approved waste disposal procedures.
- For larger spills follow appropriate procedures for the facility.
Above Ground Tank Leak and Spill Control BMPs

- Inspect or test rain water from secondary containment and spill containment prior to releasing it.
After releasing rain water from secondary containment or spill containment ensure that the drain valve is closed.
Environmental Concerns

- Petroleum products such as:
  - Fuels
  - Oils
  - Greases
- Asphalt and concrete
- Hazardous materials including paint
- Pesticides
- Fertilizers
- Cleaning products
Outdoor Loading/Unloading

- Conduct outdoor loading/unloading on paved surfaces.
- Install a dead-end sump beneath loading docks where large quantities of liquids are handled.
- Limit exposure of materials to rainfall.
- Regularly check for leaks.
- Place drip pans under hoses when making connections and during liquid material transfer. Promptly remove drip pan after use.
Outdoor Loading/Unloading

An ample supply of spill clean-up materials should be stored in a readily-accessible location in the vicinity of the loading/unloading area.
Outdoor Loading/Unloading

- Inspect loading/unloading areas before and after rainfall, and as needed during other times to promote good housekeeping.
- Repair and replace perimeter controls, containment structures, and covers as needed to keep them functioning properly.
Outdoor Loading/Unloading

Dirty loading area without cover.
Outdoor Loading/Unloading

Better Material Delivery Area
SC-34 Waste Handling and Disposal

○ Waste Storage
○ Provide designated, covered, and contained waste collection areas and containers.
○ Arrange for regular waste disposal.
Waste Storage

Open Trash Container
Waste Storage

Covered Trash Containers
Building and Grounds Maintenance

BMPs

- Use dry clean-up methods for spills and outdoors cleaning. Vacuum, sweep, and use rags and absorbents.
  - Clean vehicle fluid drips, leaks, or spills in parking lots with absorbent and promptly dispose of used absorbent.
  - If further cleaning is necessary use steam cleaning to reduce water and contain water so that it does not enter storm drain.
Building and Grounds Maintenance

BMPs

Inspect and monitor the operation of cooling towers. Some biocides used in the cooling water are hazardous materials.

Direct roof drains to landscaped areas or other areas where they will not wash down parking lots or create erosion.

Direct air conditioning condensate to landscaped areas or other areas where it will not enter storm drains or cause erosion.
Building and Grounds Maintenance

BMPs

- Keep an adequate number and size of trash receptacles available.
- Cover dumpsters and other trash containers especially when rain is expected. Inspect them for leaks and repair as necessary.
- Keep parking lots swept to prevent sediment from entering storm drains.
Building and Grounds Maintenance

BMPs

- Minimize power-washing and water use.
- Discharge mop water to sanitary sewer.
- Contain wash water that comes into contact with hazardous materials and dispose of as hazardous waste.
Building and Grounds Maintenance

BMPs

✦ Contain all concrete slurry, waste, and wash water and dispose of properly. Consider using a vacuum.

✦ Sweep up dried slurry as much as possible.

✦ Store asphalt cold mix under cover and where it will not come into contact with run-on or run-off.
Building and Grounds Maintenance

BMPs

- Recycle or reuse solid wastes whenever possible. Purchase materials that are recyclable and that are minimally packaged.
- Water efficiently and minimize the use of pesticides in landscaping.
- Properly label, store, and dispose of hazardous wastes. Refer to your agency’s HazMat management procedures.
BMPs

- Minimize water use in washing activities.
- Properly dispose of wash water and sediment generated during maintenance.
- Dispose of sweepings and cleaning wastes as solid waste.
Avoid excessive irrigation to minimize runoff containing nutrients, pesticides and herbicides.

Regularly sweep maintenance yard to keep trash and sediment from potentially flowing into storm drains.
Building and Grounds Maintenance

- Regularly inspect, clean, and maintain storm water drainage system.
SC-43 Parking/Storage Area Maintenance

- Sweep all parking lots at least once before the rainy season
- Clean oily spots with absorbent
- Do Not Allow Discharges to the Storm Drain
- Provide adequate trash receptacles
Industrial/Commercial Source Control BMPs

- SC-35 Safer Alternative Products
- SC-40 Contaminated or Erodible Areas
- SC-42 Building Repair and Construction
- SC-44 Drainage System Maintenance
SC-40 Contaminated or Erodible Areas

- Preserve natural vegetation.
- Re-vegetate when necessary.
- Remove contaminated soil.
- Use chemical stabilization or synthetic membranes or plastic to control erosion.
- See the Construction BMP Handbook for more details.
SC-42 Building Repair and Construction

- Recycle building materials and use recycled materials to the maximum extent practical.
- Follow the BMPs in the Construction BMP Handbook.
- Maintain good housekeeping
- Cover materials left out during rain and control run-on and runoff
- Clean flow lines (gutter, drain inlets, other areas where rain water will flow)
Municipal Source Control BMPs Applicable to Commercial/Industrial Facilities

- For Fixed Facility
  - SC-50 Over Water Activities
  - SC-60 Housekeeping Practices
  - SC-61 Safer Alternative Products (similar to SC-35) – When they are available should be used if practical and effective
Municipal Source Control BMPs Applicable to Commercial/Industrial Facilities

For Field Programs

- SC-70 Road and Street Maintenance
- SC-71 Plaza and Sidewalk Cleaning
- SC-72 Fountains & Pools Maintenance
- SC-73 Landscape Maintenance
- SC-74 Drainage System Maintenance (similar to SC-44)
- SC-75 Waste Handling and Disposal (similar to SC-34)
- SC-76 Water and Sewer Utility Maintenance
Paint Use, Storage and Cleanup

- Use water-based instead of oil-based paints.
- Keep all paint and wastes from entering storm drain.
- Store paint as a hazardous material.
- Clean oil-based paint brushes with paint thinner and reuse paint thinner.
Paint Use, Storage and Cleanup

- Use water-based instead of oil-based paints.
- Keep all paint and wastes from entering storm drain.
- Store paint as a hazardous material.
- Clean oil-based paint brushes with paint thinner and reuse paint thinner.
- Dispose of small empty paint containers
  - 5 gal. or less - allow to dry, dispose of as solid waste
  - More than five gal. – recycle container if possible
Improper Paint Disposal
Proper Paint Disposal
Proper Paint Cleanup

Clean water-based paint brushes by painting out and rinsing in sink.
Proper Paint Storage
SC-71 Plaza and Sidewalk Cleaning

- Avoid steam cleaning with soap.
- Dry sweep initially.
- Contain water used to clean sidewalks.
Proper Sidewalk Cleaning

Using dry cleanup method, sweeping.
Improper Sidewalk Cleaning

Did not sweep before steam cleaning and not containing runoff.
Proper Steam Cleaning

Steam cleaning parking lot containing the water.
Disposal of Swept Waste

Proper disposal of waste into trash can, not storm drain.
**SC-72 Fountain and Pool Maintenance**

- When draining a pool, ensure that the water has been dechlorinated; water must be tested.
- Discharge to sanitary sewer if permitted to do so or re-use in landscaped area.
- Do not allow the water to come in contact with potential pollutants on the way to the storm drain.
- Control erosion if discharging to an erodible area.
SC-73 Landscape Maintenance - Includes Parks!

Environmental Concerns:

- Litter
- Animal waste
- Green Waste
- Sediment
- Cleaners/detergents
- Pesticides/Fertilizers
Landscape Maintenance

- Do not wash animal waste down the storm drainage system.
- Control animal waste through ordinances requiring collection and removal of the waste from parks and other areas where the waste can be washed into the storm drain.
- Provide pet waste dispenser at parks with signs posted requiring pet waste cleanup.
Landscape Maintenance

- Keep drain inlets within the park cleaned of clippings, litter/debris, and sediment.
- Minimize runoff from sand boxes and clay fields to storm drains.
Landscape Maintenance

When cleaning mowers or other equipment, ensure that wash water does not enter the storm drain system. Consider washing over a landscaped area.
Consider native, hardy perennial species which require less fertilizers and pesticides.

Landscaping vendors should be required to minimize fertilizer and pesticide use and restrict application to the growing season.

Use mulch in appropriate bare areas to prevent weeds and control erosion.

Sweep up drift!
Landscape Maintenance

BMPs:
- Maintain sprinkler systems and minimize overwatering.
- Consider using organic or non-toxic fertilizers.
SC-74 Drainage System Maintenance

Drains should be appropriately labeled to indicate whether they flow into a treatment system such as an oil/water separator, the sanitary sewer, or directly to the storm water drainage system.

NO DUMPING!
ONLY RAIN
IN THE DRAIN!
Drain BMPs

Drains should be appropriately labeled to indicate whether they flow into a treatment system such as an oil/water separator, the sanitary sewer, or directly to the storm water drainage system.
Drain Control BMPs

Use dry clean-up methods, such as sweeping.
TC-50 Water Quality Inlet
Oil Water Separators

Used to separate sediment, oil, and grease from water using gravity.
Oil Water Separator BMPs

- Inspect and clean regularly.
- Dispose or recycle collected oil.
- Dispose of grit properly (may be hazardous waste).
- Record maintenance.
"Who’s the Boss” Question Three

The main difference between sanitary sewers and storm sewers is…?

a) Treatment
b) One is municipal
c) Odor
d) Sanitary means clean
"Who’s the Boss” Question Four

Which of the following is **not** considered a pollutant?

- a) Rain Water
- b) Wash Water
- c) Biodegradable Cleaning Products
- d) Sawcut Slurry
Pollutants of Concern (POC) are those Project Pollutants that have been identified as Pollutant Stressors in Project Receiving Waters that are 303(d) listed.
Project pollutants observed during inspection

- Washing
  - Oil and grease

- Staining and Metals

- Sediment

- Oil and grease
Identifying Project Receiving Waters

➔ Proximate Receiving Waters – Generally receiving waters closest to your project
  ➔ A precise definition has not been established (yet)
  ➔ When TMDLs come into play, they are likely to push the “Proximate Threshold” further downstream

➔ Downstream Receiving Waters – Include all receiving waters that could receive drainage from the project site
Identifying Project Receiving Waters

This map is intended for developments in Riverside County only.
Identifying Project Receiving Waters

This map is intended for developments in Riverside County only.

Legend:
- Red: 2006 303(d) listed impaired Waters
- Light Blue: Hydrology
- Dark Blue: Santa Ana Region Boundary
- Purple: Nutrients/Turbidity/Bacteria & Viruses
- Yellow: Bacteria & Viruses
- Light Pink: Nutrients/Bacteria & Viruses
- Pink: Nutrients
The 303(d) list is the place to go to find out if a receiving water is impaired and what is causing the impairment.
Identifying TMDL's Receiving Water Impairments

<table>
<thead>
<tr>
<th>REGION</th>
<th>NAME</th>
<th>CALWATER</th>
<th>POTENTIAL SOURCES</th>
<th>TNMDL</th>
<th>ESTIMATED SIZE AFFECTED</th>
<th>PROPOSED TMDL COMPLETION</th>
</tr>
</thead>
<tbody>
<tr>
<td>8</td>
<td>Back Gully Creek</td>
<td>0011000</td>
<td>Pollutant/STRESSOR</td>
<td>Low</td>
<td>0.3 Miles</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Elsinore, Lake</td>
<td>00231000</td>
<td>Nutrients</td>
<td>High</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Unknown Source</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Organic Enrichment/Low Dissolved Oxygen</td>
<td>High</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Sedimentation/Siltation</td>
<td>High</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Urban Runoff/Storm Sewers</td>
<td>High</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Unknown Toxicity</td>
<td>High</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Unknown Source</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Page 2 of 7
Impairments to receiving waters – Lake Elsinore and Santa Ana River Reach 3

Sediment/Turbidity/Siltation
Nutrients
Oxygen Demanding Substances
Bacteria & Viruses
Unknown Toxicity
Compare Project Pollutants to Impairments of Receiving Waters

Project Pollutants

- Sediment
- Trash
- Bacteria & Viruses
- Oil and grease
- Landscaping waste
- Vehicle/equipment washing
- Rust staining

Impairments

- Sediment
- Nutrients
- Oxygen Demanding Substances
- Bacteria & Viruses
- Unknown Toxicity
The Pollutants of Concern to receive more stringent controls

Pollutants of Concern

- Sediment
- Bacteria & Viruses
Questions and Answers

Test Time
Call Us if you need help

AEI-CASC’s Storm Water Team

- Inspections
- Sampling
- Training
- SWPPP Preparation or Review
- Annual Reports
- Expert Witness
Questions/ Contacts

AEI-CASC Contacts

- Chandra Santiago
  - 909-783-0101

- Rick Sidor

- Jeff Endicott
  - 909-783-0101