

RIVERSIDE COUNTY WATERSHED PROTECTION



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Industrial/Commercial Facility Inspection and BMP Training

Prepared for: Santa Ana Region Permittees

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Santa Ana Region

Course Outline



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- ▶ Introduction
- ▶ Regulatory Background
 - ▶ Federal and State Enforcement
 - ▶ Industrial General Permit
 - ▶ Municipal Permits
- ▶ Inspection Protocols for Industrial/Commercial Facilities
- ▶ Commercial and Industrial Facility Best Management Practices (BMPs)



Common Acronym Definitions



BMP	Best Management Practice	NONA	Notice of Non-Applicability
DAMP Plan	Drainage Area Management Plan	NPDES	National Pollutant Discharge Elimination System
IGP	Industrial General Permit	SMARTS	Storm Water Multiple Application and Report Tracking System
LIP	Local Implementation Plan	SWPPP	Storm Water Pollution Prevention Plan
NEC	No Exposure Certification		
NOI	Notice of Intent		

Why Are We Here?

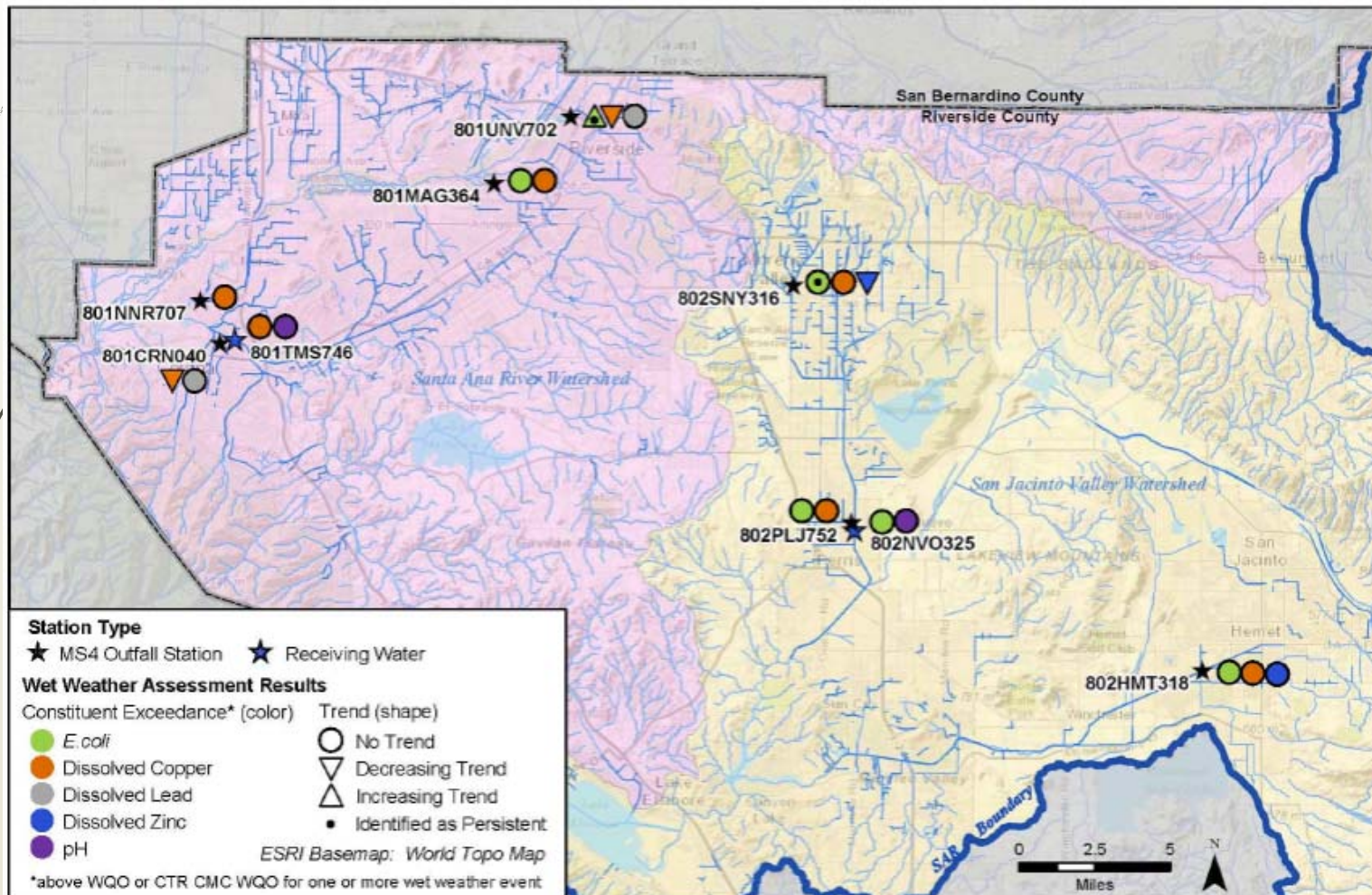
- ▶ To comply with permit requirements for training.
- ▶ To review municipal permit requirements for commercial / industrial inspections.
- ▶ To review BMPs applicable to commercial and industrial facilities.



What pollutants should I be concerned about?



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Regulatory Background



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Federal Regulations

Clean Water Act (EPA)

State Regulatory Agencies

State Water Resources Control Board (SWRCB)

Regional Water Quality Control Boards (RWQCBs)

Permits

Industrial General Permit

Construction General Permit

Municipal Permits (Phase I)

Municipal Permit (Phase II Small MS4)

Regional Construction Permits

Local Laws

Ordinances, Resolutions and Codes

Municipal Staff and Municipal O&M

You!

Municipal Inspector

Public Education/ Outreach

Can the Feds issue enforcement actions?



- ▶ Yes.
 - ▶ Up to \$100,000 per day per violation, for a second time offender.
- ▶ “Any person who knowingly violates” ... shall be punished by a fine of not less than \$5,000 nor more than \$50,000 per day of violation, or by imprisonment for not more than 3 years, or by both
- ▶ CWA Section 309(c)(2)(B)
- ▶ 40 C.F.R. 122

The Clean Water Act has other indirect impacts



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- ▶ CWA 33 U.S.C. § 1365 (a) (1) gives the public the right to sue
- ▶ Non-governmental Groups and Private Citizens
 - ▶ NRDC
 - ▶ Baykeeper
 - ▶ Other Groups



NATURAL RESOURCES DEFENSE COUNCIL



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, 04/28/09)

▶ Administrative Civil Liability

- ▶ States maximum and assessed penalties
- ▶ Informs of public hearing, waiver of right to a hearing or meeting with Executive Officer

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What's the magnitude of their fines?



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- ▶ Under the Porter Cologne Water Quality Act:
 - ▶ \$10-\$20k per day
 - ▶ Plus \$10-\$20 per gallon
 - ▶ Plus cost of their time to inspect

What do we need to know about the IGP?



▶ General Requirements:

- ▶ Check if the facility has coverage under the IGP
 - ▶ Refer to the IGP for Categories requiring coverage
 - ▶ Report if they need to file a NOI for coverage
- ▶ Confirm that they have 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

Conditional Exclusion - No Exposure Certification (NEC)



- ▶ Conditional exclusion for any type of industry facilities that have no exposure of industrial activities and materials to storm water.
- ▶ The previous permit required light industries to obtain coverage only if their activities were exposed to storm water.
- ▶ For existing facilities the NEC had to be submitted electronically through the SMART system on or before October 1, 2015.

Notice of Non-Applicability (NONA)



- ▶ Facilities who claim “No discharge” or not connected to waters of the United States.
- ▶ Facility is engineered and constructed to contain maximum historic precipitation event (or series of events)
- ▶ Must prepare a No Discharge Technical Report signed by a registered Professional Engineer (P.E.)

Industrial/Commercial Inspection Programs for Municipalities



▶ CO-PERMITTEE INSPECTION PROGRAM

- ▶ Follow minimum inspection and enforcement procedures.
- ▶ Follow criteria for characterizing the **significance of violations, prioritizing violations**, appropriate response actions and enforcement/compliance responses.
- ▶ Standardize the implementation and enforcement of the respective Storm Water Ordinances.
- ▶ Enforce the respective Storm Water Ordinances consistent with the DAMP and the local MS4 Permit.

Prioritizing Violations



Table 3-1. Prioritization Factors for Violations

Prioritization Factor	Description
Characteristics of the Potential Pollutant	Based on chemical characteristics and potential to impact Beneficial Uses of Receiving Waters. The more toxic, hazardous, or detrimental to the Beneficial Uses of the Receiving Waters a Pollutant is the higher priority the discharge.
Sensitivity of the Affected Receiving Waters	The sensitivity of the affected Receiving Waters should be considered directly proportional to the priority of the violation because, for example, a more sensitive Receiving Water may suffer severe adverse effects from the discharge of a particular Pollutant, whereas, a less sensitive Receiving Water may suffer no adverse effects from the same Pollutant discharge. It is also important to consider that a Receiving Water may be highly sensitive to one potential Pollutant discharge while, at the same time, completely insensitive to another potential Pollutant. Examples of Receiving Waters that may be particularly sensitive include those with municipal supply or wildlife habitat designated Beneficial Uses.
Proximity of Receiving Waters	The closer a Receiving Water is to the discharge, the less chance there is for dispersion, dilution, or degradation of the potential Pollutant. Therefore, the closer the discharge is to Receiving Waters, the higher priority of the violation.
Magnitude of Discharge (volume and mass)	A larger Illegal Discharge should be of a higher priority than a smaller Illegal Discharge because as the magnitude of the Pollutant discharge increases the extent of impact of the discharge on the environment increases as well.
Responsiveness of the Discharger in taking corrective actions	A discharger who is responsive and implements a good faith effort to correct a violation is more likely to minimize adverse impacts to surface water quality than a discharger who takes no action to correct a violation. Therefore, the priority of a violation should decrease as the responsiveness of the discharger increases.
Intent of the Discharger	Is the violation accidental or the result of an accident or a deliberate attempt to circumvent regulations?
Frequency of the Violation	Violations of local Stormwater Ordinances and erosion control ordinances that are continuous or reoccurring should be of a higher priority than isolated occurrences of violations. The more frequent a violation, the more likely it is that the discharge will impact surface water quality.
Previous History of Non-Compliance of the Responsible Party	A poor history of non-compliance of a discharger should result in a higher prioritization of subsequent violations as compared to a discharger with a good history of compliance because a history of non-compliance is evidence of a discharger's lack of concern for complying with local stormwater and erosion control ordinances.

Severity of Violations



Table 3-2. Severity of Violations

Factors Affecting the Severity of Violations	Severity Priority Level		
	High	Medium	Low
Pollutant characteristics	Hazardous Materials (e.g., pesticides and solvents)	Metals, nutrients, sediment, other non-Hazardous Materials	Trash and debris
Sensitivity of Receiving Waters	Drinking water source, wildlife refuge, Illegal Discharges containing Pollutants identified as Impairing the Receiving Water.	Recreational reservoir, riparian habitat	Dry, ephemeral stream
Proximity of Receiving Waters	Adjacent	Several hundred feet away	Several hundred yards away
Discharge magnitude	1000's of gallons	100's of gallons	10's of gallons
Responsiveness of discharger	No action to contain or mitigate discharge	Reactive to control discharge when requested (i.e., cooperative)	Implements spill control plan at own initiative or shows good faith effort to respond
Intent of violation	Intentional	Discharge due to lack of controls or negligence	Implemented and maintained controls that failed (i.e., accident)
Frequency of violation	Continuous	Intermittent	Isolated incident
Previous history of discharger	Enforcement and cleanup historically resisted and more than one previous violation	Enforcement and cleanup performed when threatened and one or less previous violations	Enforcement and cleanup performed when requested and no previous violations

What do municipalities have to do for Industrial/Commercial facilities? (Santa Ana River Permit)



- ▶ **Inventory Industrial and Commercial Facilities**
 - ▶ Includes – hazmat permitted, retail food facilities
 - ▶ Based on Municipal Wastewater Pre-Treatment Program
- ▶ **Prioritize the facilities as high, medium, or low threat to water quality**
- ▶ **Inspect the facilities**
- ▶ **Enforce Local Ordinance and Refer facilities to RWQCB for IGP Enforcement**
- ▶ **Train Inspectors**

What does the inventory include? (Santa Ana River Permit)



- ▶ The inventory contents shall at a minimum include the relevant site information:
 - ▶ Facility name (dba),
 - ▶ Facility address, city, zip code, mailing address (if different), location reference (such as, GIS coordinates, cross streets, etc.)
 - ▶ Facility contact and phone number,
 - ▶ Description of the facility's principle products/services,
 - ▶ Pollutants potentially generated by the site/source,
 - ▶ SIC(s), State WDID No. (if any),
 - ▶ APN, and
 - ▶ Site size.

What types of facilities are inspected? (Santa Ana River Permit)



- ▶ The type of industrial/commercial establishment that is inspected includes, but is not limited to:
 - ▶ Automobile mechanical repair, maintenance, fueling, or cleaning operation
 - ▶ Automobile or other vehicle body repair or painting operations
 - ▶ Painting or coating operations
 - ▶ Restaurants
 - ▶ Mobile automobile/equipment washing, carpet/furniture cleaning, or other high pressure/steam cleaning (base of operations)
 - ▶ Nurseries and greenhouses
 - ▶ Landscape/hardscape installation (base of operations)
 - ▶ Managed turf facilities
 - ▶ Facilities that transport, store, or transfer pre-production plastic pellets
 - ▶ Industrial facilities (defined in Industrial General Permit)

How are facilities prioritized? (Santa Ana River Permit)



- ▶ **Priority evaluation of facilities should be based on:**
 - ▶ Type of industrial activities (SIC codes),
 - ▶ Wastes generated or materials used or stored outside,
 - ▶ Pollutant discharge potential,
 - ▶ Facility size and design,
 - ▶ Proximity and sensitivity of Receiving Waters,
 - ▶ Non-stormwater discharge(s),
 - ▶ Frequency of existing inspections, based upon other statutes or regulations, ordinances, or codes, and other factors, and
 - ▶ Whether or not the facility is subject to the Industrial General Permit.

High Priority Criteria (Santa Ana River Permit)



- ▶ **AT A MINIMUM, a high priority shall be assigned to:**
 - ▶ Industrial Facilities subject to section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 (SARA);
 - ▶ Industrial Facilities that handle or generate Pollutants for which the receiving water is impaired,
 - ▶ Facilities that have a significant potential to release pre-production plastics or nurdles into the environment, and
 - ▶ Industrial Facilities with a high potential for or history of unauthorized, non-storm water discharges.

How often are inspections required? (Santa Ana River Permit)



- ▶ 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 are to be inspected at least once during the term of the Order.
 - ▶ In the event that the industrial facility is found to be in violation of the Co-Permittee's Storm Water Ordinances, an enforcement order shall be issued and a re-inspection frequency must be maintained that is adequate to bring the Industrial Facility into compliance (at a minimum, once a month or within the compliance schedule prescribed by the Co-Permittee in a written notice to the discharger).

You should also refer to your DAMP and LIP.

What Industrial Facilities are inspected?



- ▶ The Co-Permittees **NEED NOT INSPECT** Industrial facilities **ALREADY INSPECTED** by Regional Board staff if the inspection was concluded within the time period.
- ▶ Regional Board staff inspection information is available via the Storm Water Multiple Application & Report Tracking System (SMARTS).
 - ▶ <https://smarts.waterboards.ca.gov>
 - ▶ click the "View SW Data" button on the right side of the screen
 - ▶ select "Storm Water Overview Reports" to access the information.

What do we inspect for at Industrial Facilities?



- ▶ **Industrial facility compliance surveys and inspections shall at a minimum address the following:**
 - ▶ Check for NOI to comply with the IGP or other permit issued to an industrial facility;
 - ▶ Confirm compliance with the Storm Water Ordinance;
 - ▶ Check for active non-storm water discharges, potential illicit connections, and illegal discharges to the MS4;
 - ▶ 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; and
 - ▶ Implementation and maintenance of appropriate BMPs.

What do we inspect for at Commercial Facilities? (Santa Ana River Permit)



- ▶ **The commercial facility compliance surveys and inspections shall, at a minimum, address the following:**
 - ▶ **Commercial activity type(s) and SIC(s);**
 - ▶ **Compliance with each Co-Permittee's Storm Water Ordinances;**
 - ▶ **Check for active non-storm water discharges, potential illicit connections, and illegal discharges to the MS4;**
 - ▶ **Assessment of the implementation, maintenance, and effectiveness of the designated minimum and/or enhanced BMPs; and**
 - ▶ **If applicable, check for submittal of an NOI to comply with the Industrial General Permit or other permit issued by the State or Regional Board.**

What do we inspect for at Commercial Facilities? (Santa Ana River Permit)



- ▶ Inspections at restaurants include, at a minimum, the following:
 - ▶ Oil and grease disposal to verify these wastes are not discharged onto a parking lot, street or adjacent catch basin;
 - ▶ 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;
 - ▶ 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;
 - ▶ 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; and
 - ▶ Violations of the Storm Water Ordinance shall be enforced by the jurisdictional Co-Permittee.

Inspection Program



FOOD FACILITY STORMWATER COMPLIANCE SURVEY

FACILITY DBA	FACILITY #	DATE
ADDRESS	ACTIVITY	SERVICE CODE: 409
COMPLIANCE AREAS		
	YES	NO NA
GREASE BARRELS INTERCEPTORS		
1. Grease pumped/removed from grease interceptor on a regular basis.		
2. Grease interceptor located outside facility, maintained properly.		
3. Evidence of spillage to ground surface at grease interceptor?		
EQUIPMENT CLEANING		
4. The following items are cleaned in such a manner that all wash water is discharged to the sanitary sewer or is collected for proper disposal:		
a. Grease filters		
b. Floor mats		
c. Floors (mop water and rinse water)		
d. Grills		
OUTSIDE AREAS		
4. The following areas are cleaned in such a manner that all wash water is discharged to the sanitary sewer or is collected for proper disposal:		
a. Sidewalk or outdoor seating		
b. Drive thru and parking lot		
DUMPSTERS AND RECYCLING CONTAINERS		
5. Food/liquid waste bagged and sealed before disposal.		
6. Dumpsters and recycling containers are covered.		
7. Spilled materials around containers are picked up regularly.		
8. Wash water is discharged to the sanitary sewer or is collected for proper disposal.		
EMPLOYEE EDUCATION/AWARENESS		
9. Brochures or posters displayed.		
10. BMPs observed.		
OVERALL RATING	GOOD	AVERAGE NEED IMPROVEMENT
COMMENTS:		
Received by: _____ Env. Health Specialist: _____ Badge # _____		



HAZARDOUS WASTE/ HAZARDOUS MATERIALS FACILITY STORM WATER COMPLIANCE SURVEY FORM

FACILITY DBA	TELEPHONE	DATE
ADDRESS	CITY, ZIP	
MAILING ADDRESS (if different from site address)	MAILING CITY, ZIP	
CONTACT	FACILITY#	SIC CODE
Compliance Areas		
	YES	NO N/A
*OUTSIDE AREAS (Free of staining & debris; provides good housekeeping; maintained in a manner to prevent runoff).		Requires follow up
1. CHEMICAL STORAGE * The outside storage area is kept secure to minimize the possibility of a release. Chemicals / materials are protected from precipitation / stormwater runoff and the containers show no signs of leaking.		
2. DUMPSTER * Lid closed. No liquids are leaking from dumpster; surrounding area is free of trash.		
3. ABOVEGROUND TANKS * No ground staining, no spillage observed and no discharge to storm drain. Tanks are maintained to minimize the possibility of a release (secondary containment).		
4. ONSITE STORM DRAIN* Protected from accidental discharge other than stormwater.		
5. POWER WASH OR STEAM CLEAN* (discharge to sewer) Drains to oil/water separator connected to a sanitary sewer and not a septic system or storm drain. Steam cleaning not discharged to parking lot, storm drain or soil.		
6. PARKING LOT / DRIVEWAY* Free of excess trash, chemical staining or liquids other than water.		
7. OTHER* Non-storm water discharge (i.e. non-hazardous process discharge).		
8. MOP WATER TO SANITARY SEWER VIA CLARIFIER. Mop water is not dumped to the soil, parking lot, gutter, street, or other areas susceptible to storm water runoff and discharge to the storm drain.		
9. STORM WATER EDUCATIONAL BROCHURES GIVEN TO FACILITY OR POSTERS DISPLAYED FOR EMPLOYEES. If so, what informational material should be sent to the facility?		
10. IF A SWPPP IS REQUIRED, WAS IT AVAILABLE FOR REVIEW? See storm water handout for industrial facilities.		
11. NOTICE OF INTENT. Has the site obtained necessary permit coverage under the General Industrial Permit, if appropriate?		
OVERALL EVALUATION/ COMMENTS:		
RECEIVED BY:	HAZ MAT SPEC.	BADGE #
Agency referred to as indicated on the back of this page.		



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:**
 - ▶ The Storm Water Ordinance;
 - ▶ The Riverside County MS4 Permit(s), the DAMP, and LIP;
 - ▶ The IGP and any other permit issued to a commercial/ industrial facility by the State or Regional Board;
 - ▶ Pollution prevention plans; and
 - ▶ Implementation and maintenance of appropriate BMPs for commercial and industrial sites.

Question One



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

a) Implementation of BMPs

b) Indoor Restrooms

c) Compliance with SW Ordinance

d) Trash Facilities

Question Two



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

a) Restaurant

b) Manufacturing Facility

c) RWQCB inspected facility

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?



▶ Illicit Connection

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

▶ 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



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?



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- “ 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).”
- Remember to prioritize violations and determine the severity to help determine the enforcement response.
- Local ordinances describe the city’s legal authority

Read your local ordinance!

Table 3-1. Prioritization Factors for Violations

Prioritization Factor	Description
Characteristics of the Potential Pollutant	Based on chemical characteristics and potential to impact Beneficial Uses of Receiving Waters. The more toxic, hazardous, or detrimental to the Beneficial Uses of the Receiving Waters a Pollutant is the higher priority the discharge.
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Frequency of the Violation	Table 3-2. Severity of Violations			
	Factors Affecting the Severity of Violations	High	Medium	Low
Previous History of Non-Compliance of the Responsible Party	Pollutant characteristics	Hazardous Materials (e.g., pesticides and solvents)	Metals, nutrients, sediment, other non-Hazardous Materials	Trash and debris
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	Intent of violation	Intentional	Discharge due to lack of controls or negligence	Implemented and maintained controls that failed (i.e., accident)
	Frequency of violation	Continuous	Intermittent	Isolated incident
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IC/ID Reporting



- ▶ **IC/ID Reporting:**
 - ▶ Identify and contact responsible agency over the area of the IC/ID.
 - ▶ Santa Ana River Region: City NPDES Coordinator/Public Works Department
- ▶ **The responsible party must investigate within 24 hours and determine if the IC/ID is an **Emergency Situation** that poses an immediate threat to human health or the environment:**
 - ▶ sewage spill over 1,000 gallons,
 - ▶ could impact water contact recreation,
 - ▶ any oil spill that could impact wildlife,
 - ▶ any hazardous materials spill where residents are evacuated,
 - ▶ any spill of reportable quantities of hazardous waste,
 - ▶ or any spill reportable to Cal EMA.

IC/ID Reporting



- ▶ **If discharge is determined to be an Emergency Situation:**
 - ▶ It must be reported immediately:
 - ▶ Cal EMA at (800) 852-7550
 - ▶ Executive Officer of the Santa Ana Regional Board (951) 782-4130, or email at region8info@waterboards.ca.gov
 - ▶ Within 10 days, a written report must be submitted
 - ▶ Nature of the situation
 - ▶ Corrective actions taken by owner
 - ▶ Other relevant information
 - ▶ Type of enforcement that will be carried out by the Co-Permittee

What about Enforcement?



- ▶ If discharge is determined to be a **Non-Emergency Situation** representing a possible violation of the IGP or other permit issued to an industrial facility:
 - ▶ Provide oral or email notice to RWQCB within two (2) working days, the location where the incident occurred and describing the nature of the incident.



What's the purpose of the Pollution Control ordinances?



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- ▶ Example Ordinance
- ▶ 754.1- Riverside County



- ▶ ARTICLE I
- ▶ TITLE, PURPOSE AND GENERAL PROVISIONS

Section 2. Purpose and Intent. 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.

What does a typical ordinance say about pollutants?



- ▶ Example Ordinance 754.1- Riverside County
- ▶ ARTICLE I section 3.1
- ▶ 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!

What does a typical ordinance say about polluting?



- ▶ Example Ordinance 754.1- Riverside County
- ▶ 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.

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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...

Would this be in violation?



- ▶ 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...



Would this be in violation?



- ▶ 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 teeth do the cities have?



- ▶ Ordinances vary from city to city:
- ▶ City of Beaumont Example:
 - ▶ 1st offense....\$100.00 (and optional misdemeanor)
 - ▶ 2nd offense....\$200.00
 - ▶ 3rd offense.....\$1,000.00 and/or 6 months in jail
- ▶ Other options: permit revocation

Read your ordinance!

The Key Message in the Permit

- ▶ Prevent Pollution in Storm Water
- ▶ “ONLY RAIN DOWN THE STORM DRAIN”
- ▶ Prevent Non-Storm Water Discharges
- ▶ Industrial/Commercial Compliance Inspection Staff have stormwater responsibilities
- ▶ It’s your job to contribute to keeping our waters healthy!



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Inspection Protocols for Industrial/Commercial Facilities

General Inspection Procedures



- ▶ **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 illegal discharges
 - ▶ Records of violations such as Notices to Comply and Notice of Violations

General Inspection Procedures



- ▶ **GENERAL ENTRY PROCEDURES (Your agency's procedures may vary):**
 - ▶ Present your credentials to a responsible facility owner/operator, whether or not identification is requested.
 - ▶ It's helpful if the inspector is clearly identifiable as an inspector – City badged polo shirt, etc.
 - ▶ 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.

General Inspection Procedures



- ▶ **GENERAL ENTRY PROCEDURES (Your agency's procedures may vary):**
 - ▶ 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 Inspection Procedures



- ▶ **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.

General Inspection Procedures



- ▶ **GENERAL ENTRY PROCEDURES (Your agency's procedures may vary):**
 - ▶ 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.

Background Information Inspectors Should Be Prepared to Answer



- ▶ Inspectors need an in depth 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



- ▶ **Common general questions an inspector should be prepared to answer:**
 - ▶ What local legal authority do you have to enter the premises and conduct inspections?
 - ▶ What is “stormwater” and “non-stormwater”?
 - ▶ What is an illicit connection?
 - ▶ What is an illegal 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.**

Background Information Inspectors Should Be Prepared to Answer



- ▶ 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 illegal 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.

Background Information Inspectors Should Be Prepared to Answer



- ▶ **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

Background Information Inspectors Should Be Prepared to Answer



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- ▶ **What is an 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 an illegal 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.



Background Information Inspectors Should Be Prepared to Answer



- ▶ **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.**



General Inspection Procedures



- ▶ **CONDUCTING THE INSPECTION (Your agency's procedures may vary)**
- ▶ **Inspect the facility layout to locate:**
 - ▶ the storm drain system
 - ▶ stormwater drainage path,
 - ▶ storage areas,
 - ▶ process areas,
 - ▶ heavy equipment wash and maintenance areas
 - ▶ stormwater sampling locations, if applicable.

General Inspection Procedures



- ▶ **CONDUCTING THE INSPECTION (Your agency's procedures may vary)**
- ▶ 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 previous questions by observing these areas of activities:
 - ▶ 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



Outdoor Activity Inspection



- ▶ Answer previous questions by observing these areas of activities:
 - ▶ 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 previous questions by observing these areas of activities:
 - ▶ 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



▶ CONDUCTING THE INSPECTION (Your agency's procedures may 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



- ▶ **CONDUCTING THE INSPECTION**
(Your agency's procedures may 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.



General Inspection Procedures



- ▶ **CONDUCTING THE INSPECTION (Your agency's procedures may vary)**
 - ▶ 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.

Inspection Program



- ▶ **Example Inspector Reference Binder**
 - ▶ **Municipal Permit**
 - ▶ **Industrial General Permit (IGP)**
 - ▶ **Ordinance**
 - ▶ **SICs**
 - ▶ **BMPs**
 - ▶ **General Inspection Procedures**

Essential Knowledge – Getting More of It!



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**California Stormwater
Quality Association**



- ▶ **Riverside NPDES/Municipal Stormwater Management Program**
 - ▶ <http://www.rcflood.org/NPDES/SantaAnaWS.aspx>
- ▶ **California Storm Water Quality Association Manuals (CASQA)**
 - ▶ <https://www.casqa.org/resources/bmp-handbooks>
- ▶ **California Hazardous Materials Investigators Association (CHMIA)**
 - ▶ <https://chmia.com/>
- ▶ **CalEPA Basic Inspector Academy**
 - ▶ <https://www.arb.ca.gov/training/DisplayCourse.php?SectionNumber=8446>

Brochures Offered by the District



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Stormwater Pollution
What you should know for...
Industrial & Commercial Facilities
Best Management Practices (BMPS) for:

- Industrial
- Commercial Facilities

Riverside County Stormwater Members

Flood Control District (Lead Agency) (951) 955-1350	City of Lake Elsinore (951) 674-3124
County of Riverside (951) 955-1000	City of La Quinta (760) 777-7000
City of Banning (951) 922-3130	City of Menifee (951) 672-6777
City of Beaumont (951) 769-8520	City of Moreno Valley (951) 413-3120
City of Calimesa (951) 795-9801	City of Murrieta (951) 304-2489
City of Canyon Lake (951) 244-2955	City of Norco (951) 735-3900
Cathedral City (760) 770-0349	City of Palm Desert (760) 346-0611
City of Coachella (760) 398-3522	City of Palm Springs (760) 323-8253
City of Corona (951) 736-2248	City of Perris (951) 943-6100
City of Desert Hot Springs (760) 329-6411	City of Rancho Mirage (760) 324-4511
City of Hemet (951) 765-2300	City of Riverside (951) 926-5311
City of Indian Wells (760) 346-2489	City of Temecula (951) 694-6444
City of San Jacinto (951) 487-7330	City of Wildomar (951) 677-7751
City of Indio (760) 391-4000	Coachella Valley Water District (760) 398-2651

The Riverside County "Only Rains Down the Storm Drain" Pollution Prevention Program gratefully acknowledges San Bernardino County's Stormwater Program for their contribution to this brochure.

Stormwater Pollution
What you should know for...
THE FOOD SERVICE INDUSTRY
Best Management Practices (BMPS)

For Information:
For information on "closed-loop" suppliers and recycling/disposal vendors, contact:
County of Riverside
Health Services Agency
Department of Environmental Health
at (909) 368-5055.

SPILL RESPONSE AGENCY: (909) 368-5055
HAZ-MAT: (909) 368-5245 or 911
HAZARDOUS WASTE DISPOSAL: (909) 368-5055
RECYCLING INFORMATION: 1-800-366-SAVE
TO REPORT ILLEGAL DUMPING OR A CLOGGED STORM DRAIN: 1-800-506-2555

To order additional brochures or to obtain information on other pollution prevention activities, call (909) 955-1111.

The Cities and County of Riverside
Storm Water/Clean Water Protection Program
1-800-506-2555

Stormwater Pollution
What you should know for...
Outdoor Cleaning Activities and Professional Mobile Service Providers
Storm drain pollution prevention information for:

Helpful telephone numbers and links:

RIVERSIDE COUNTY WATER AGENCIES

City of Banning	(951) 922-3130
City of Beaumont/Cherry Valley	(951) 945-4704
City of Blythe	(760) 932-6164
City of Coachella	(760) 398-1302
City of Corona	(951) 736-2248
City of Hemet	(951) 765-2300
City of Norco	(951) 226-1607
City of Riverside Public Works	(951) 914-6440
City of San Jacinto	(951) 694-4041
Coachella Valley Water District	(760) 398-2651
Desert Water Agency (Palm Springs)	(760) 333-4931
Eastern Municipal Water District	(951) 926-7777
Illinois Valley Municipal Water District	(951) 674-1146
Imperial Water District	(951) 678-2169
Imperial Water Company	(951) 244-4198
Midfield Water District	(951) 698-2143
Indio Water Authority	(760) 391-4129
Imperial Community Services District	(951) 605-7114
San Lake Water	(951) 698-1041
Mountain Springs Water	(760) 328-6448
Rancho California Water District	(951) 286-6902
Redlands CSD #60	(760) 922-4934
Riverside Co. Service Area #51	(951) 221-1370
Riverside Community Services District	(951) 688-2380
Valley Sanitary District	(760) 347-1150
Western Municipal Water District	(951) 289-5033
Yuma Valley Water District	(951) 970-1111

REPORT ILLEGAL STORM DRAIN DISPOSAL
1-800-506-2555 or e-mail us at fbm@rcfd.org

Other resources include:

- California Storm Water Quality Association: www.cswqa.org
- State Water Resources Control Board: www.waterboards.ca.gov
- Storm Water of North America: www.stormwater.com

Stormwater Pollution
Do you know where street flows actually go?
Storm drains are NOT connected to sanitary sewer systems and treatment plants!

ONLY RAIN IN THE DRAIN

The primary purpose of storm drains is to carry rain water away from developed areas to prevent flooding. Pollutants discharged to storm drains are transported directly into rivers, lakes and streams. Soaps, degreasers, automotive fluids, litter and a host of materials are washed off buildings, sidewalks, plazas and parking areas. Vehicles and equipment must be properly managed to prevent the pollution of local waterways.

Unintentional spills by mobile service operators can flow into storm drains and pollute our waterways. Avoid mishaps. Always have a Spill Response Kit on hand to clean up unintentional spills. Only emergency Mechanical repairs should be done in City streets, using drip pans for spills. Plumbing should be done on private property. Always store chemicals in a leak-proof container and keep covered when not in use. Window Power Washing waste water shouldn't be released into the streets, but should be disposed of in a sanitary sewer, landscaped area or in the soil. Soiled Carpet Cleaning wash water should be filtered before being discharged into the sanitary sewer. Dispose of all filter debris properly. Car Washing/Detailing operators should wash cars on private property and use a regulated hose nozzle for water flow control and runoff prevention. Capture and dispose of waste water and chemicals properly. Remember, storm drains are for receiving rain water runoff only.

REPORT ILLEGAL STORM DRAIN DISPOSAL
1-800-506-2555



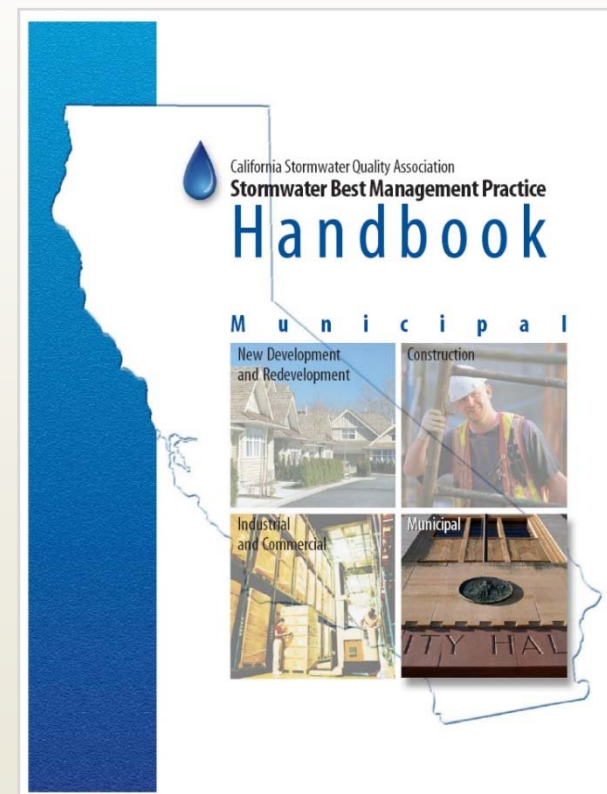
To Order Brochures: fbmowrer@rcflood.org

Essential Knowledge – Getting More Of It!



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- ▶ CASQA's 2003 and 2009 Handbooks
 - ▶ A Great Source of Stormwater Information
- ▶ The Handbooks – A 4 Volume Set
- ▶ Municipal O&M Staff use these Handbooks the most
 - ▶ Municipal
 - ▶ Industrial and Commercial
- ▶ Municipal O&M Staff may need these Handbooks too
 - ▶ New Development and Redevelopment
 - ▶ Construction
- ▶ Get them at <https://www.casqa.org/resources/bmp-handbooks>





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Break Time

Stretch Your Legs!

Back in 15 Minutes!



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Discussion

What have you experienced?



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Commercial and Industrial Facility BMPs

Incorporating pollution prevention into everyday activities at
commercial and industrial facilities

Inspection Program – Hazardous Facilities



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- ▶ Let's go through the Hazardous Waste/Hazardous Materials Facility form

HAZARDOUS WASTE/ HAZARDOUS MATERIALS FACILITY STORM WATER COMPLIANCE SURVEY FORM			
FACILITY DBA	TELEPHONE	DATE	
ADDRESS	CITY, ZIP		
MAILING ADDRESS (if different from site address)	MAILING CITY, ZIP		
CONTACT	FACILITY#	SIC CODE	
Compliance Areas			
*OUTSIDE AREAS (Free of staining & debris; provides good housekeeping; maintained in a manner to prevent runoff.)			YES NO N/A
1. CHEMICAL STORAGE * The outside storage area is kept secure to minimize the possibility of a release. Chemicals / materials are protected from precipitation / stormwater runoff and the containers show no signs of leaking.			Requires follow up
2. DUMPSTER * Lid closed. No liquids are leaking from dumpster; surrounding area is free of trash.			
3. ABOVEGROUND TANKS * No ground staining, no spillage observed and no discharge to storm drain. Tanks are maintained to minimize the possibility of a release (secondary containment).			
4. ONSITE STORM DRAIN* Protected from accidental discharge other than stormwater.			
5. POWER WASH OR STEAM CLEAN* (discharge to sewer) Drains to oil/water separator connected to a sanitary sewer and not a septic system or storm drain. Steam cleaning not discharged to parking lot, storm drain or soil.			
6. PARKING LOT / DRIVEWAY* Free of excess trash, chemical staining or liquids other than water.			
7. OTHER* Non-storm water discharge (i.e. non-hazardous process discharge).			
8. MOP WATER TO SANITARY SEWER VIA CLARIFIER. Mop water is not dumped to the soil, parking lot, gutter, street, or other areas susceptible to storm water runoff and discharge to the storm drain.			
9. STORM WATER EDUCATIONAL BROCHURES GIVEN TO FACILITY OR POSTERS DISPLAYED FOR EMPLOYEES. If no, what informational material should be sent to the facility?			
10. IF A SWPPP IS REQUIRED, WAS IT AVAILABLE FOR REVIEW? See storm water handout for industrial facilities.			
11. NOTICE OF INTENT. Has the site obtained necessary permit coverage under the General Industrial Permit, if appropriate?			
OVERALL EVALUATION/ COMMENTS:			
RECEIVED BY:	HAZ MAT SPEC:	BADGE #	
Agency referred to as indicated on the back of this page.			



Chemical Storage



Can materials be stored in a containment bin?



Chemical Storage



Are containers protected from precipitation?



Chemical Storage



← Spill containment
but no cover

Chemical Storage



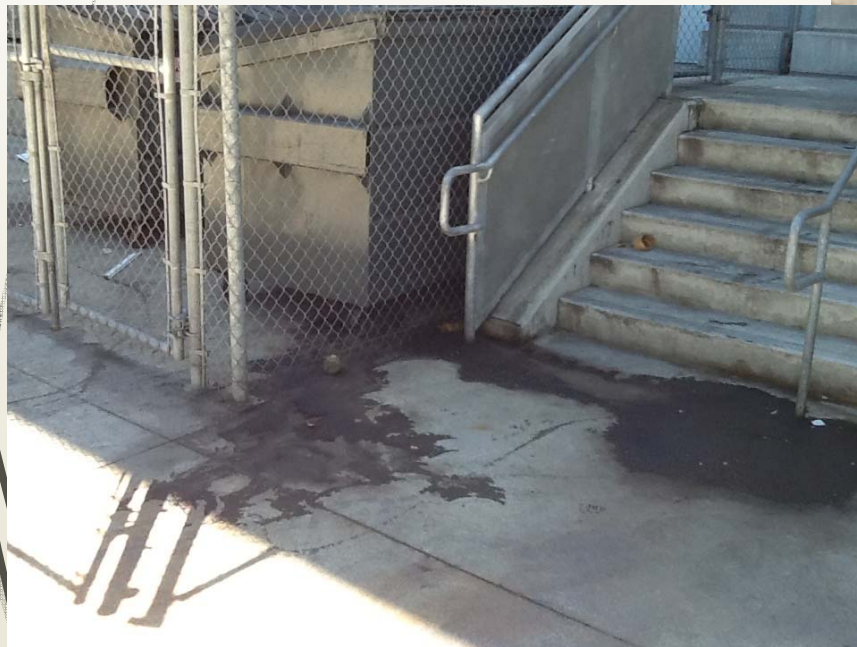
Are drip pans, secondary containment, spill control devices implemented



Dumpster



Is there evidence of leaks or spills?



Dumpster



Is the surrounding area maintained clean and free of litter or debris?



Dumpster



Is there a designated, covered and contained waste storage area?



Dumpster



Are waste materials kept away from drainage conveyances?



Dumpster



Nice! Designated waste storage area.



Dumpster



Functioning lids. Stored under cover.



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Dumpster



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Containment berm.



Aboveground Tanks



Are containers protected from collisions?



Aboveground Tanks



Are practices implemented to minimize contact between stormwater and vehicle fluids?

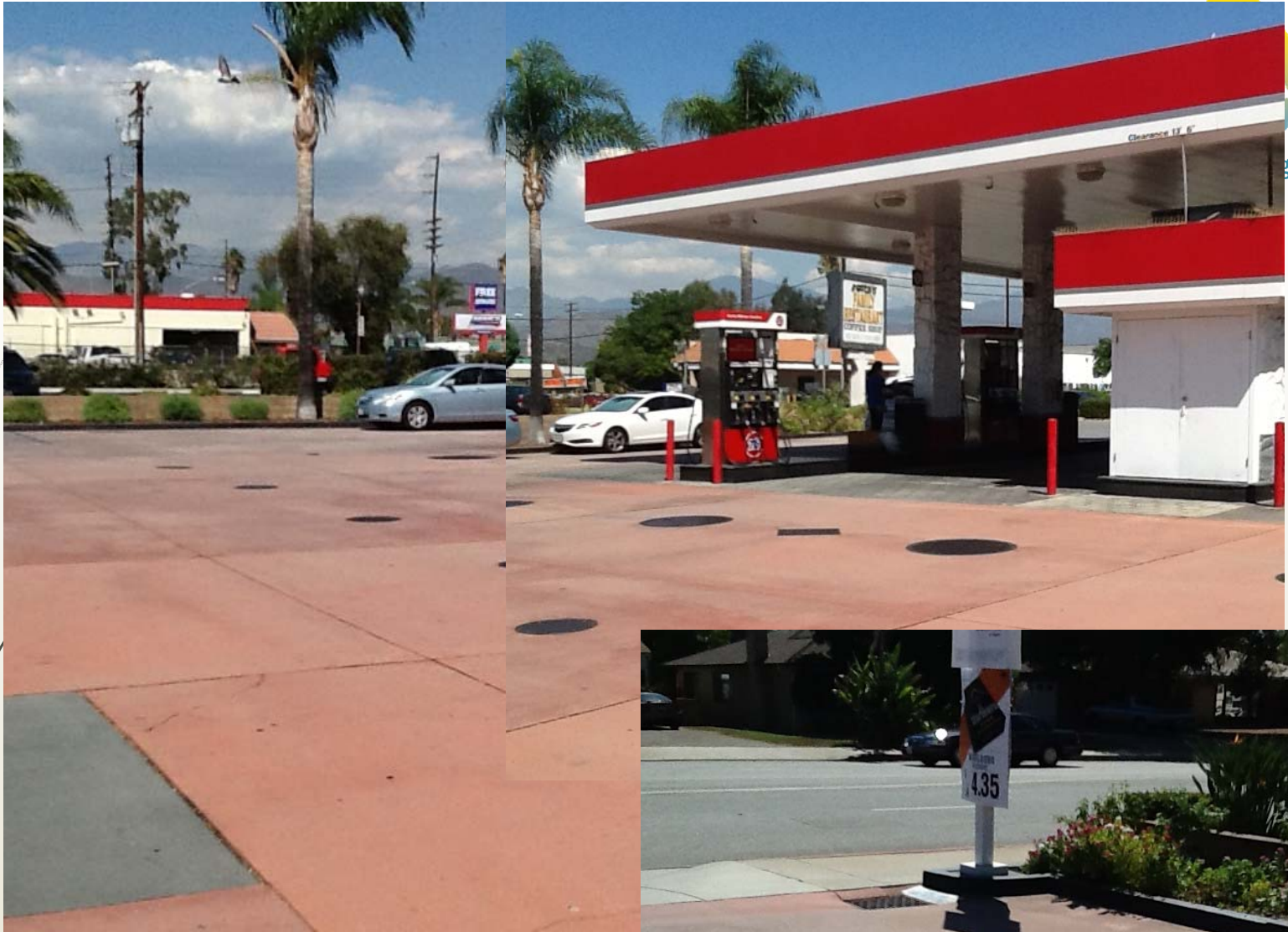


Aboveground Tanks



Spill containment?





Onsite Storm Drain



Are drains appropriately labeled to indicate whether they flow into a treatment system such as an oil/water separator, the sanitary sewer, or directly to the stormwater drainage system?



Onsite Storm Drain



Are sump drains properly labeled?



Onsite Storm Drain



Are materials stored on or near drainage system?



Onsite Storm Drain



Look for evidence of illegal discharges or connections.



Onsite Storm Drain



Do storm drain inlets appear to be properly maintained and/or cleaned?



Onsite Storm Drain



Are waste materials kept away from drainage conveyances?

- Location
- Location
- Location!



Power Wash or Steam Clean



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Does area properly collect and dispose of wash water?



Power Wash or Steam Clean



Does area properly collect and dispose of wash water?



Power Wash or Steam Clean



Is the oil/water separator connected to the sanitary sewer?



Power Wash or Steam Clean



Use dry methods when possible



Power Wash or Steam Clean



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Is wash water properly collected and disposed?



Parking Lot/Driveway



Is there evidence of oil or chemical spills?



Parking Lot/Driveway



Is there evidence of past accidental release of material to the storm drain?



Parking Lot/Driveway



Is there evidence of past accidental release of material to the storm drain?



Parking Lot/Driveway



Are storage areas free and clear of leaks or drips?



Parking Lot/Driveway



Are drip pans placed under leaking vehicles and equipment?



Parking Lot/Driveway



Is idle equipment stored under cover?



Other: Non-Stormwater Discharges



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Are non-stormwater discharges occurring at the site?



Other: Outdoor Storage of Raw Materials



Are materials stored outdoors protected from precipitation or stormwater flows?



Other: Loading / Unloading Areas



Are loading and unloading areas regularly swept and kept clean?



Other: Outdoor Equipment Operations



Are work areas covered with a permanent roof where possible?



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Other: Outdoor Equipment Operations



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Are process areas kept clean? Are they protected from stormwater flows?



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Other: Outdoor Loading/Unloading

Is there an ample supply of spill clean-up materials readily accessible located in the vicinity of the loading/unloading area?



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Wash Water Disposal



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Is mop water to sanitary sewer via clarifier?



Employee Education/ Awareness


- Brochures or posters displayed?



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StormWater Pollution
What you should know for...

**OUTDOOR CLEANING
ACTIVITIES**
NON-STORMWATER DISCHARGES



**GUIDELINES
for disposal of washwater
from:**

- Sidewalk, plaza or parking lot cleaning
- Vehicle washing or detailing
- Building exterior cleaning
- Waterproofing
- Equipment cleaning or degreasing

Industrial Facilities



- ▶ Is the SWPPP available for review?
- ▶ Has the site filed the Notice of Intent to obtain permit coverage?

DID YOU KNOW . . .

**YOUR FACILITY MAY
NEED A STORM WATER
PERMIT?**



Many industrial facilities
and manufacturing operations
must obtain coverage under the
Industrial Activities Storm Water
General Permit

**FIND OUT
IF YOUR FACILITY
MUST OBTAIN A PERMIT**

Inspection Program – Food Facilities



- ▶ Let's go through the Food Facility form

FOOD FACILITY STORMWATER COMPLIANCE SURVEY			
FACILITY DBA	FACILITY #	DATE	
ADDRESS	ACTIVITY	SERVICE CODE: 410	
COMPLIANCE AREAS			
	YES	NO	N/A
GREASE BARRELS/ INTERCEPTORS			
1. Grease pumped/removed from grease interceptor on a regular basis.			
2. Grease interceptor located outside facility, maintained properly.			
3. Evidence of spillage to ground surface at grease interceptor?			
EQUIPMENT CLEANING			
4. The following items are cleaned in such a manner that all wash water is discharged to the sanitary sewer or is collected for proper disposal:			
a. Grease filters			
b. Floor mats			
c. Floors (mop water and rinse water)			
d. Grills			
OUTSIDE AREAS			
4. The following areas are cleaned in such a manner that all wash water is discharged to the sanitary sewer or is collected for proper disposal:			
a. Sidewalk or outdoor seating			
b. Drive thru and parking lot			
DUMPSTERS AND RECYCLING CONTAINERS			
5. Food/liquid waste bagged and sealed before disposal.			
6. Dumpsters and recycling containers are covered.			
7. Spilled materials around containers are picked up regularly.			
8. Wash water is discharged to the sanitary sewer or is collected for proper disposal.			
EMPLOYEE EDUCATION/ AWARENESS			
9. Brochures or posters displayed.			
10. BMPs observed.			
OVERALL RATING	GOOD	AVERAGE	NEEDS IMPROVEMENT
COMMENTS:			
Received by:	Env. Health Specialist:	Badge #	

Grease Handling



- ▶ **Is outside grease interceptor properly maintained?**
 - ▶ Grease storage is periodically inspected for leaks and spills
 - ▶ Surrounding area is maintained clean and free of residues
 - ▶ No evidence of illegal discharges



Grease Handling



Equipment Cleaning



Is wash water from cleaning activities being properly discharged to the sanitary sewer?



Outside Area Cleaning



- ▶ Are the following areas being cleaned in such a manner that water and waste is being collected and disposed of properly?

- ▶ Sidewalk and outdoor seating
- ▶ Drive-through



Dumpsters and Recycling Containers



Food/liquid waste bagged and sealed before disposal? Are containers equipped with functioning lids?



Dumpsters and Recycling Containers



Spilled materials picked up regularly? Are there adequate number of trash receptacles?



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Dumpsters and Recycling Containers



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Wash water discharged to the sanitary sewer or collected for proper disposal?



Dumpsters and Recycling Containers



Are non-stormwater discharges occurring at the site?



Employee Education/ Awareness

- ▶ Brochures or posters displayed?



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StormWater Pollution

What you should know for...

THE FOOD SERVICE INDUSTRY



Best Management Practices (BMPs) for:

- Restaurants
- Grocery Stores
- Delicatessens
- Bakeries

Question Three



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

a) Treatment

b) One is municipal

c) Odor

d) Sanitary means clean

Question Four



Which of the following is not considered a pollutant?

a) Wash Water

b) Rain Water

c) Biodegradable Cleaning
Products

d) Sawcut Slurry



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Questions and Answers