INDUSTRIAL GENERAL PERMIT INSPECTION PROCESS

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~ 1300 IGP FACILITIES IN SF BAY REGION 2 WE INSPECT FACILITIES BASED ON:

Complaints (WB, US EPA, Cal EPA, Local Agency, public)

Missing Annual Reports

Non-filer

NOT

NEC/NONA

Random (SIC, level 1/2, NAL exceedances)

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Uploaded into SMARTS

Site-specific

List all Industrial Materials

Identify and evaluate all sources of pollution that may affect the quality of industrial storm water discharges and authorized NSWDs

Identify and describe all the minimum BMPs and advanced BMPs (permit section X.H)

GOOD HOUSEKEEPING
PERMIT SECTION X.H.1.A

Are housekeeping needs addressed in all industrial outdoor areas of the facility:

- ✓Storm water discharge locations, drainage areas, and conveyances systems
- ✓Waste handling/disposal areas
- ✓Perimeter areas impacted by off-facility materials or storm water run-on/off
- ✓Are debris, waste, spills, tracked materials, or leaked materials properly cleaned and disposed?
- ✓Is material tracking minimized or prevented?
- ✓Is dust generated from Industrial materials or activities?

GOOD HOUSEKEEPING BMPS

- ✓Are all facility areas impacted by rinse/wash waters cleaned as soon as possible?
- ✓Are all stored industrial materials that can be readily mobilized by contact with storm water covered?
- ✓Are all stored non-solid industrial materials or wastes (e.g. particulates, powders, shredded paper, etc.) that can be transported or dispersed by the wind or contact with storm water contained?
- ✓Is disposal of any rinse/wash waters or industrial materials into the storm water conveyance system prevented? This is also a discharge prohibition.
- ✓Are storm water discharges from non-industrial areas (e.g. storm water flows form employee parking area) that contact industrial areas of the facility minimized?
- ✓Are authorized NSWDs from non-industrial areas (e.g. potable water, fire hydrant testing, etc.) that contact industrial areas o the facility minimized?

PREVENTATIVE MAINTENANCE (PERMIT SECTION X.H.1.B)

Do you see any equipment or systems that are currently spilling or leaking?

Do you see any staining or other evidence of spills or leaks on equipment or from equipment systems?

Are there systems to in place to detect leaks?

Are there procedures for prompt maintenance and repair of equipment?

What is schedule for maintenance?

SPILL AND LEAK PREVENTION AND RESPONSE (PERMIT SECTION X.H.1.C)

Do you see spills or leaks happening currently?

Do you see staining or other evidence of former spills or leaks on the ground or other surfaces?

- ✓Are spills or leaks cleaned up promptly?
- ✓Are materials disposed of properly?
- ✓What are the procedures and/or controls to minimize spills and leaks?

MATERIAL HANDLING AND WASTE MANAGEMENT (PERMIT SECTION X.H.1.D)

Look at all transfer points, transfer routes and storage areas.

Is the handling of industrial materials or wastes that can be readily mobilized by contact with Storm water during a storm event prevented or minimized?

Are all stored non-solid industrial materials or wastes contained that can be transported or dispersed by wind or contact with storm water?

Are all industrial waste disposal containers and industrial material storage containers that contain industrial materials covered when not in use?

Are run-on and storm water generated from within the facility diverted away from all stockpiled materials?

Are all spills of industrial materials or wastes that occur during handling cleaned in accordance with the spill response procedures?

Are any outdoor material or waste handling equipment or containers that can be contaminated by contact with industrial materials or wastes cleaned as appropriate?

EROSION AND SEDIMENT CONTROLS (PERMIT SECTION X.H.1.E)

Are effective wind erosion controls implemented?

Is there effective stabilization for inactive areas, finished slopes, and other erodible areas prior to forecasted storm event?

Is there effective perimeter controls maintained and all site entrances and exits stabilized to sufficiently control discharges of erodible materials from discharging or being tracked off the site?

Are run-on and storm water generated from within the facility diverted away form all erodible materials?

If sediment basins are implemented, do they comply with the design storm standards in Section X.H.6?

ADVANCED BMPS (PERMIT SECTION X.H.2)

In addition to the minimum BMPs described in Section x.H.1, has the discharger, to the extent feasible implemented and maintained any advanced BMPs identified in Section x.G.2.b, necessary to reduce or prevent discharges of pollutants in its storm water discharge in a manner that reflects best industry practice considering technological availability and economic practicability and achievability?

ADVANCED BMPS

Storm resistance shelters

Storm water containment and discharge reduction BMPs. These include BMPs that diver, infiltrate, reuse, contain, retain, or reduce the volume of storm water runoff.

Treatment Control BMPs (mechanical, chemical, biologic, or any other treatment technology that will meet the treatment design standard.

Other advanced BMPs that can meet effulent limitations.

FOLLOW-UP INSPECTION PROCESS

- ✓Issue NOV, if necessary
- ✓Follow-up Inspection
- ✓Review SWPPP and all monitoring data in greater detail
- ✓Refer to Enforcement Section

POOR HOUSEKEEPING

POORLY MAINTAINED BMPS

LACKING ADEQUATE SPILL & LEAK BMPS

INADEQUATE MATERIAL & WASTE HANDLING

INADEQUATE EROSION & SEDIMENT CONTROL BMPS

QUESTIONS & ANSWERS

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