

Contra Costa Clean Water Program's Annual Commercial and Industrial Stormwater Inspection Training

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CONTRA COSTA
CLEAN WATER
PROGRAM

May 5, 2016

Overview of Today's Workshop

Housekeeping Items

- Do Not Park in Visitor Parking Area; If You Have, Please Move Your Vehicle Elsewhere (HHWCF, street, etc.)
- Bathroom
- Please Do Not Wander – Escorts Are Required beyond Bathroom Area Due To Safety and Security Issues
- Continental Breakfast and Lunch

Registration Packet

- Agenda
- Model Stormwater Inspection Report Form
- Presentations
- Workshop Evaluation Form

WORKSHOP AGENDA

8:30 am Registration

9:00 am Welcome and Introductions

9:15 am **Stormwater Inspections under the Reissued Municipal Regional Permit**

10:00 am **Inspecting Contra Costa County Public Works Corporation Yard**

10:15 am Walk to Public Works' Corporation Yard

10:30 am **Conduct Mock Inspection of Corporation Yard**

11:45 am Return to Central Contra Costa Sanitary District Training Room

Noon Lunch

1:00 pm **Inspecting Mobile Businesses: The Good, the Bad, and the Ugly**

1:45 pm Break

2:00 pm **Talkin' Trash**

2:45 pm Wrap-up/Evaluations

3:00 pm Adjourn

Stormwater Inspections under the Reissued Municipal Regional Stormwater Permit

Presentation to the Contra Costa Watershed Forum

March 9, 2016

Beth Baldwin, Program Staff

Contra Costa Clean Water Program



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Regulating Stormwater

- Stormwater is water that runs off roads, parking lots, and other impervious surfaces after a precipitation event. This water flows into curb inlets and storm drains in our streets and ultimately enters our creeks, bays, and oceans UNTREATED.
- Municipalities discharge stormwater through their stormwater network, called a Municipal Separate Storm Sewer System (MS4).
- These discharges are regulated by a National Pollutant Discharge Elimination System (NPDES) permit issued by the respective Regional Water Quality Control Board.
- In Contra Costa, municipalities are regulated either by the Municipal Regional Stormwater Permit (MRP) issued by the San Francisco Bay Regional Water Quality Control Board or the East Contra Costa County Municipal Stormwater Permit (East County Permit) issued by the Central Valley Regional Water Quality Control Board.
- East County Permit covers the eastern one-third of the County (Antioch, Brentwood, Oakley, and unincorporated County) and mirrors the MRP.

From MRP 1.0 to MRP 2.0

- The Municipal Regional Stormwater Permit (MRP 1.0) Expired on November 30, 2014
- Draft Tentative Order for the Reissued Municipal Regional Stormwater Permit Released on May 11, 2015
- Two Public Workshops on the Draft Tentative Order Held on June 10, 2015 and July 8, 2015 with Deadline for Written Comments on July 10, 2015
- Revised Tentative Order Released on October 19, 2015
- The Reissued Municipal Regional Stormwater Permit (MRP 2.0) Adopted on November 19, 2015 with an Effective Date of January 1, 2016

Municipal Regional Permit 2.0

The Reissued Municipal Regional Permit (MRP 2.0) Contains 22 Provisions, Most Relevant to Stormwater Inspections Are Highlighted in Yellow!

- Provision C.2 Municipal Operations
- Provision C.3 New Development and Redevelopment
- **Provision C.4 Industrial and Commercial Site Controls**
- **Provision C.5 Illicit Discharge Detection and Elimination**
- Provision C.6 Construction Site Control
- Provision C.7 Public Information and Outreach
- Provision C.8 Water Quality Monitoring
- Provision C.9 Pesticides Toxicity Control
- Provision C.10 Trash Load Reduction
- Provision C.11 Mercury Controls
- Provision C.12 Polychlorinated Biphenyls (PCBs) Controls
- Provision C.13 Copper Controls
- Provision C.15 Exempted and Conditionally Exempted Discharges
- Provision C.17 Annual Reports

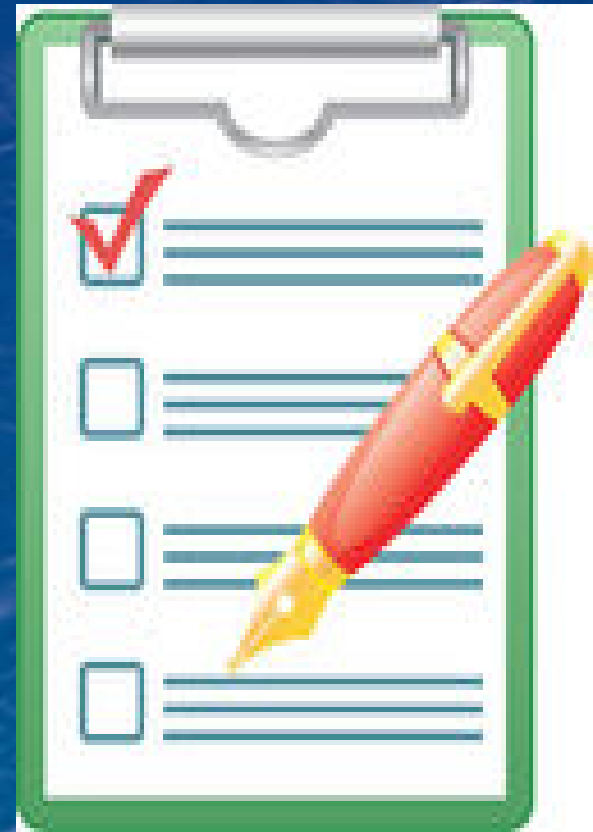
Provision C.2 – Municipal Operations

- C.2.f Corporation Yard BMP Implementation
 - Routinely Inspect corporation yards to ensure that non-stormwater discharges are not entering the storm drain system.
 - Beginning in FY 2016-2017, corporation yards must be fully inspected each year between September 1 and September 30.
 - Active non-stormwater discharges must cease immediately and corrective actions implemented before the next rain event but no later than 10 business days (exceptions allowed if justified).

Provision C.2 – Municipal Operations

- C.2.f Corporation Yard BMP Implementation (continued)

Beginning in FY 2016-2017 Annual Report, Permittees must list activities conducted in the corporation yard that have BMPs in the site-specific SWPPP, date of inspections, results of inspections, and any follow up actions.



Provision C.4 - Industrial and Commercial Site Controls

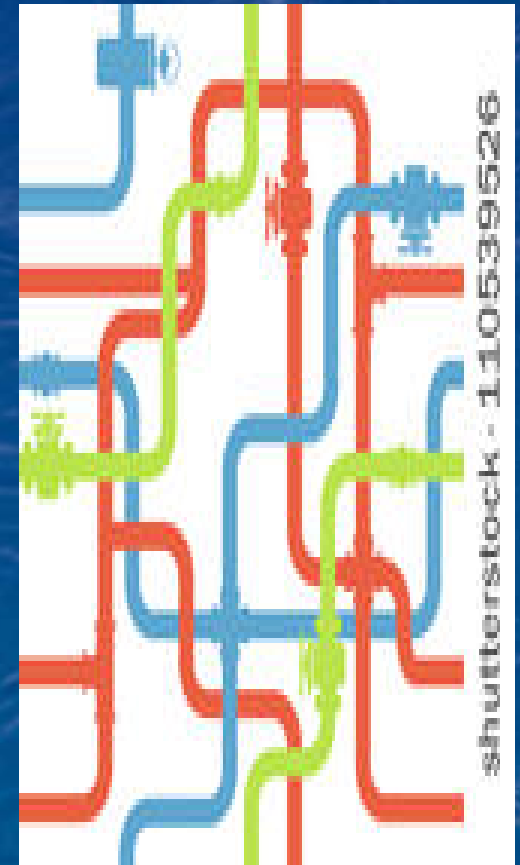
- C.4.a Legal Authority to Inspect Businesses
- C.4.b Business Inspection Plan
 - List of businesses/facilities whose activities may produce pollutants when exposed to stormwater
 - Includes vehicle salvage yards, metal recyclers, vehicle repair, building trades, nurseries, other facilities designated by the Permittee, etc.
 - Also includes industrial facilities subject to the Statewide NPDES General Permit for Stormwater Discharges Associated with Industrial Activity (IGP)
 - Plan includes process for prioritizing inspections, inspection frequency, inventory, and mechanism to include new businesses that warrant inspections.

Provision C.4 - Industrial and Commercial Site Controls

- C.4.c Enforcement Response Plan
 - Description of Enforcement Procedures
 - Discovery of the Problem to Implementation of Corrective Action to Follow Up Inspections Including Agency Referral
 - Enforcement Response (Level I – Level IV)
 - Timely Correction of Potential and Actual Discharges (MPR 2.0) versus Timely Correction of Violations (MPR 1.0)
 - Actual Discharges Shall Cease Immediately
 - Corrective Actions Shall Be Implemented Before the Next Rain Event but No Longer Than 10 Business Days After Discharge Discovered (exceptions allowed with justification)

Provision C.4 - Industrial and Commercial Site Controls

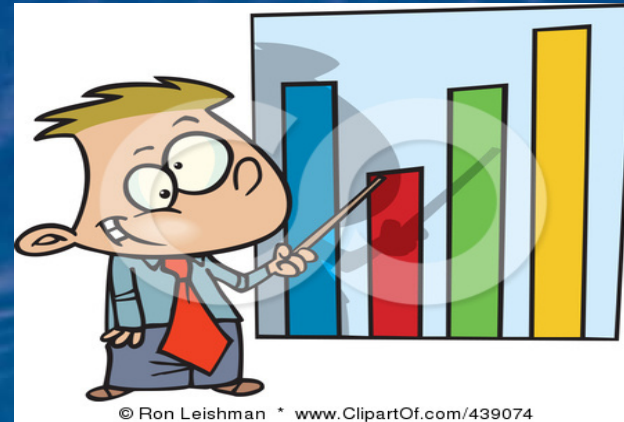
- C.4.d Inspections
 - Observations for appropriate BMPs
 - Observations of unauthorized discharges, illicit connections, and potential discharges of pollutants to stormwater
 - Observations for noncompliance with Permittees ordinances and other local requirements
 - Verification of coverage under the IGP (if applicable)
 - Record keeping



Provision C.4 - Industrial and Commercial Site Controls

- C.4.d Inspections (Continued)
 - Data Evaluation – evaluate frequency of non-stormwater discharges by business category. Note trends and focus actions to address them.
 - Annual Reporting - report on facilities that should have coverage under the IGP but have not filed.
- C.4.e Staff Training

Inspectors to receive annual training and report on training (dates, topics, etc.)



Inspecting Facilities Subject to IGP (Also Known as NOI Facilities)

- The reissued IGP was adopted April 1, 2014, went into effect July 1, 2015, and replaces the previous 1997 statewide permit for industrial storm water.
- Facilities that have certain Standard Industrial Classification (SIC) Codes must file a Notice of Intent (NOI) with the State Water Resource Control Board (SWRCB) to obtain coverage under the IGP.
- CCWP hosted a workshop on the new IGP in 12/2014.
- Further Information about the new IGP may be found http://www.waterboards.ca.gov/water_issues/programs/stormwater/industrial.shtml

1997 IGP Versus 2015 IGP

- Several significant changes between the two permits; one that is most relevant to Stormwater Inspection Practices
 - Under the 1997 IGP, NOI Facilities with SIC Codes under Light Industrial Category (See Category 10, Attachment 1 of 1997 Permit) used to be able to self-certify they were exempt per No Exposure clause.
 - Under the 2015 IGP, these same NOI Facilities must annually file their No Exposure Certification (NEC).
 - Potentially could increase the number of facilities that must be inspected
 - Stormwater Inspectors need additional guidance.

Inspecting Facilities Subject to the IGP

- In Response to new IGP, Ad Hoc Stormwater Inspector Workgroup Was Created
 - Workgroup consisted of representatives from each of the 3 contracting POTWs, Contra Costa Health Services/Hazardous Materials Program as well as municipal staff
 - Met June through November (2015)
 - Purpose to establish minimum standards for inspecting NOI facilities, determinations of NEC, and when to refer them to the respective Regional Water Board
 - Guidance to be distributed to Inspectors at the beginning of FY 2016-2017.



Inspecting NOI Facilities

General Process



1. Determine if facility already has coverage via Stormwater Pollution Prevention Plan, Waste Discharge Identification (WDID) Number, etc.
2. Conduct inspection and determine compliance with municipal stormwater ordinance
3. Obtain SIC Code and if subject to the IGP, ask them to follow up with Regional Water Board and copy you on the email
4. If no action, provide one additional opportunity for self-reporting
5. If no action, submit facility name to Permittee for inclusion in Annual Report.

Inspectors May Choose to Implement Additional Actions (Optional)

Provision C.5 Illicit Discharge Detection and Elimination (IDDE)

- C.5.a - Legal authority to prohibit and control illicit discharges
- C.5.b. Enforcement Response Plan (ERP)
- C.5.c. Spill, Dumping, & Complaint Response Program
 - Each Permittee must have a central contact point to report spills, dumping, and complaints on municipal website by June 30, 2016.
 - Permittee must maintain a spill, dumping, and complaint response flow chart and/or phone tree that identifies positions responsible for receiving, investigating, and abating complaints.
- C.5.d. Tracking and Case Follow-up
 - Database to log complaint, track corrective action, and verify resolution.

Impact of Provision C.5.a – C.5.d on Stormwater Inspections

- With publication of spill contact number on each Permittee's website, anticipate an increase in the number of calls reporting on spills and illegal dumping.
- For contracted stormwater inspectors, need to work more closely with respective Permittee to understand their Spill Response Program (who to contact, who responds to what, etc.)



Provision C.5 IDDE (Continued)

- C.5.e – Control of Mobile Sources
 - Permittee shall implement a program to reduce the discharge of pollutants from mobile businesses
 - Program to Include:
 - Minimum standards and BMPs for mobile businesses (automobile washing, power washing, steam cleaning, etc.)
 - Enforcement strategy that addresses the unique characteristics of mobile businesses
 - Updating mobile business inventories
 - Outreach and education strategy to mobile businesses operating within the Permittee's jurisdiction
 - Inspection of mobile businesses, as needed
 - Permittees will report on above in the FY 2016-2017 Annual Report

Impact of Provision C.5.e on Stormwater Inspections

Need to develop more comprehensive mobile business inventory:

Stormwater Inspectors to collect mobile business name and contact information for services performed at stationery businesses (supermarkets, restaurants, etc.).

These mobile businesses will then receive outreach material from CCCWP.

Hope there will be more regional collaboration through BASMAA!



Provision C.10 Trash Load Reduction

Added and Expanded Trash Requirements in MRP 2.0

- Trash Reduction Requirements
 - 60% Reduction by July 1, 2016
 - 70% Reduction by July 1, 2017 (Compliance)
 - 80% Reduction by July 1, 2019 (Added Compliance Milestone)
- Greater Emphasis on Using Full Trash Capture Devices to Meet Reduction Requirements
- Mapping and Managing Trash on Private Lands Greater than 10,000 ft² that Drain to MS4 by July 1, 2018.
(For lands not treated by full trash capture and/or not located in low trash generating areas)
- Receiving Water Monitoring Program

Impact of Provision C.10 on Stormwater Inspections

More and more storm drain inlets will be fitted with trash capture devices in both public right-of-way and on private properties

Where practicable, report if device is overflowing or obvious signs of damaged

Continue to report on trash (overflowing bins, noticeable level of litter in parking lots, etc.)



Provision C.11 Mercury Controls and Provision C.12 PCBs Controls

- Total Maximum Daily Loads (TMDLs) for Both Mercury and Polychlorinated Biphenyls (PCBs)
- If Meeting TMDL Requirements for PCBs, Should Be Meeting TMDL Requirements for Mercury
- MRP 1.0 – Permittees Conducted Pilot Studies to Determine Effectiveness of Control Measures to Reduce PCB Loads to the MS4, Delta, Bay, and Ocean
- MRP 2.0 – Permittees Must Now Implement Measures to Reduce PCB Loads by Specific # of Grams/Year

Reducing PCB Loads To Meet MRP 2.0 Requirements

Control Measures that Permittees Will Implement to Reduce PCB Loads

- Manage PCB-Containing Materials and Waste During Building Demolition Activities (i.e. Establish a Building Demolition Program) by July 1, 2019
- Plan and Implement Green Infrastructure
- Source Properties Referrals and Other Actions

Impact of Provision C.11/C.12 on Stormwater Inspections

Source Property Referrals: Permittees have identified parcels whose historic land use is industrial and therefore considered high opportunity for presence of PCBs

PCBs adhere to sediment; need to identify if sediment is leaving the site through track out. If this occurs, could be contributing PCBs to Receiving Waters

Permittee need to maintain and update inventory of PCB-containing equipment



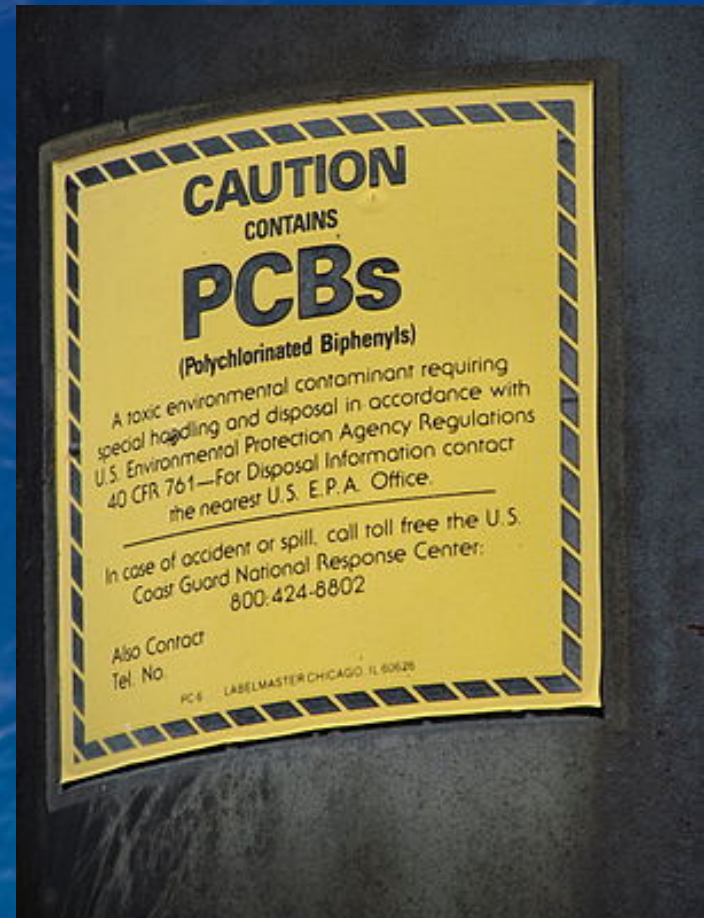
Impact of Provision C.11/C.12 on Stormwater Inspections

Looking to add a few standard questions to inspection form:

Does facility have or had PCB-containing equipment?

AND

Is sediment track out occurring?



Provision C.13 Copper Controls



- C.13.a. Manage Waste Generated from Cleaning and Treating of Copper Architectural Features, Including Copper Roofs, during Construction and Post-Construction.
- C.13.b. Manage Discharges from Pools, Spas, and Fountains that Contain Copper-Based Chemicals.
- C.13.c. Industrial Sources -The Permittees shall ensure industrial facilities do not discharge elevated levels of copper to storm drains by ensuring, through industrial facility inspections, that proper BMPs are in place.

Summary of Impact of Reissued MRP on Stormwater Inspections

- Business Inspection Plan – Need to Include Process for Identifying New Businesses to Add to Inventory and Report on Suspected NOI Facilities Who Have Not Filed
- Enforcement Response Plan – No Longer Reporting on Violations; Now Must Report on Potential and Actual Discharge of Non-Stormwater (verbal warning excluded)
- Timely Correction of Potential and Actual Discharges in 10 Days; No Longer Have 30-Day Option
- Greater Reporting on Mobile Businesses
- Greater Oversight of Trash
- Reporting on Industrial Sites with Sediment Track out

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