

Industrial Sites Task Force

Irma R. Muñoz, Los Angeles Regional Quality Control Board
 Hugh Marley, Los Angeles Regional Quality Control Board
 Bruce Reznik, Los Angeles Water Keeper
 Jeff Farano, SA Recycling
 James Simonelli, California Metals Coalition
 Councilwoman Judy Nelson, City of Glendora







Industrial Sites Task Force 1

Agenda

- Opening remarks: Board Member Irma Muñoz, Los Angeles Regional Water Quality Control Board
- Introduction of Task Force Members
- Presentation from Each Task Force Member
- Comments and questions

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LA REGIONAL WATER QUALITY CONTROL BOARD

Compliance Assurance

Stormwater Industrial General Permit



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Stormwater Industrial General Permit Background

Stormwater Industrial General Permit

- Regulates the discharge of stormwater from industries
- 3,590 facilities enrolled**
- Five Regional Board dedicated Inspectors**

Region	Construction	Industrial	Municipal
Region 1	925	785	1,435
Region 2	1,435	721	1,556
Region 3	721	1,556	1,330
Region 4	1,556	1,330	1,720
Region 5F	470	1,330	1,344
Region 5A	1,330	1,344	1,344
Region 5S	1,344	1,344	1,344
Region 6A	1,344	1,344	1,344
Region 6B	1,344	1,344	1,344
Region 7	1,344	1,344	1,344
Region 8	1,344	1,344	1,344
Region 9	1,344	1,344	1,344

Stormwater Industrial General Permit Types of Facilities Enrolled

Major Categories of Facilities	No. of Facilities Enrolled In FY 2017/2018
Manufacturing	2,369
Recycling (Including Scrap Metal)	471
Oil and Gas	101
Sewage or Wastewater Treatment Works	20

Regional Board Stormwater Inspections Fiscal Year 15/16 – 17/18

Permit Type	FY 15/16	FY 16/17	FY 17/18
	Inspections Completed	Inspections Completed	Inspections Completed
Industrial	610	879	730
Non-Filers Inspected		208	109

Stormwater Industrial General Permit Compliance Summary – Non Filers

CalEPA Environmental Justice Initiative in Pomona:

- Inspected 39 facilities
- **Identified seven non-filers.**

2017 Non Filer Initiative:

- Pomona and Paramount
- 269 potential non-enrollees inspected
- **Identified 79 non-filers**

2017 DMV Non Filer Initiative:

- 23 referrals from DMV
- 10 DMV cases inspected.
- **Identified three non-filers.**



Stormwater Industrial General Permit Compliance Summary – Non Filers

San Jose Creek Pilot Project

- Measure changes in surface water quality
- Changes in the number of enrollees
 - Municipalities list industrial facilities
 - **184 facilities inspected**
 - **50 non-filers identified**



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WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE COASTAL WATERSHEDS OF LOS ANGELES COUNTY, EXCEPT THOSE DISCHARGES ORIGINATING FROM THE CITY OF LONG BEACH

Construction Plan Review and Approval Procedures

I. Each Permittee shall develop procedures to review and approve relevant construction plan documents.

II. The review procedures shall be developed and implemented such that the following minimum requirements are met:

(1) Prior to issuing a grading or building permit, each Permittee shall require each operator of a construction activity within its jurisdiction to prepare and submit an ESCP prior to the disturbance of land for the Permittee's review and written approval. The construction site operator shall be prohibited from commencing construction activity prior to receipt of written approval by the Permittee.

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Current Coordination Efforts

Regional Board staff's outreach includes:

- **Business License Desk: IGP Enrollment**
 - City of Paramount
 - City of Pomona
 - City of Los Angeles
- **Multi-Agency Coordination**
 - LA County Green Zones Program
 - DMV sting referrals
- **LA County MS4 non-filer referrals**



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Industrial Stormwater Compliance

Stormwater Funding Group

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About LA Waterkeeper



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LA's Impaired Waterways

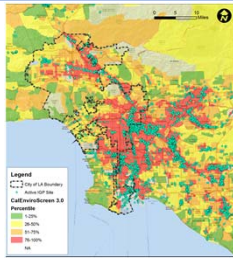


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Urban and Stormwater Runoff:

Death by a Thousand Cuts



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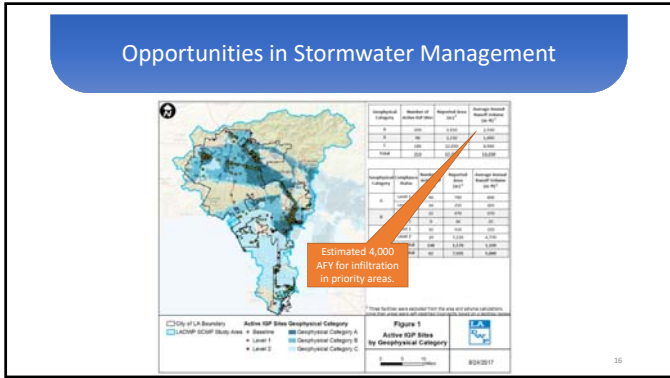
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Lack of Resources for Effective Enforcement



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Industrial Stormwater Compliance

SA Recycling & California Metals Coalition




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Advanced Metal Manufacturing Sector



- **4,000 Metal Companies in California**
- **350,000 Middle Class Jobs**
- **\$80 Billion in Economic Activity**
- **Aerospace, Infrastructure, Defense, Clean Tech, Automotive**
- **About California Metals Coalition**
 - Created in 1972
 - Non-Profit, 501(c)(6)
- **Statewide Trade Association**
 - (65% Southern CA, 20% Northern CA, 10% San Diego, 5% Central CA)




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Industry Codes Under the IGP

- **565 Total Industry Codes**
 - Industrial General Permit (IGP) Regulates **565** Industry Codes
- **64 Metals Industry Codes**
 - Metals Accounts for 64 Industry Codes (11.5%)
- **CMC Operates 2 Storm Water Compliance Groups**
 - 50 participants from 33xx and 34xx Sectors
 - Primarily Indoor Operations

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Clean Water & Level Playing Field



- **California Metals Coalition Promotes Permit Compliance**
 - Air Permits, Material Handling Permits, Storm Water Permit
- **Permitted Facilities vs. Non-Permitted Facilities**
 - Concern with Non-Fillers
 - Can't Clean Water Without Participation in Program
- **CMC: Proactive and Part of Solution**
 - Supporting Cities

James Simonelli, Executive Director
www.metalscoalition.com



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SA Recycling: Stormwater Controls


- Who is SA Recycling.
 - Recycler of metal.
 - Shredders
 - Feeder yards
- Member of the California Metals Coalition




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Stormwater Controls

- Storm Water Pollution Protection Plans



STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

SA Recycling LLC dba SA Recycling
 WDID: 419021107
Approved by: Andrew White, South Carolina
 Revised Date: 06/26/2016

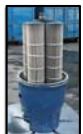
E.R. Facility Name and Contact Information

Facility Name	Address	City	State	Zip	County	Latitude	Longitude
SA Recycling LLC	10000 Highway 101	North Charleston	SC	29505	Charleston	33.4500	-79.9500

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Non-structural BMP Examples

1




Cleaning filters, preventative maintenance

2




"Mag-ing" along docks (schedule)

3



Tarping material

4




Replacing waddles and booms when needed

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Structural BMP Examples

1




Canopy structure

2




Retention Tanks

3



Secondary containment and coverage

4



Media Filters

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Stormwater Treatment

- Collection from yard and consolidation
- Settling
- Treatment Chemistry to encourage settling
- Media filtration, sometimes clay flocc
- Clarifiers
- Turbidity and in-field monitoring



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Costs

- Vacuum Sweeper: \$40-250K
- Stormwater Filtration System: \$30K-\$1M+
- Paving/Concrete Information:
 - \$ 7.28 for 8" Concrete @ \$320K per acre
 - \$ 8.47 for 12" Concrete @ \$370K per acre
 - \$ 5.18 for Asphalt 3" over 4" (Asphalt/Base) @ \$225K per acre
- Spending money because we have to for compliance and it's a priority, not because a company has so much excess.
- Complying with regulations should be a cost of doing business. Several small yards with zero effort have a bigger impact than one larger yard making 90% effort.



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City of Glendora
Mayor Pro Tem Judy Nelson



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City of Glendora

- 2014 City hired a consulting firm to assist with the administration of the industrial/commercial (I/C) facilities program
- Our consultant performs 2 inspections of each business every 5 years, including follow-up inspections for deficiencies in handling dry weather and stormwater runoff
- Every business receives an I/C Facilities Program Guidance Manual
- Permit compliance is linked to the Business License Process
- Glendora recoups the consultant costs through inspection fees



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City Business License Process

The Commercial/Industrial business owner submits for a business license. The business license application is routed to the Building Department.

- For commercial businesses:
 - If there are tenant improvements only:
 - We perform an initial building inspection of permanent Best Management Practices (BMPs)
 - Conduct 2 Inspections in 5 years
 - If it is a new development:
 - On-site stormwater infiltration
 - Conduct 2 inspections in 5 years



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Industrial Business Compliance

- Industrial businesses in the city must prove that they have Industrial General Permit (IGP) coverage before they are issued a business license.
- The building department requests a WDID number for coverage under the Industrial General Permit (IGP) or a Non-Exposure Certification (NEC) to determine compliance.



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Inspection Fees

The city has an inspection fee schedule:

Facility Type	Inspection Fee	Follow-Up Fee
Restaurant	\$140	\$150
Automotive	\$240	\$150
Retail Gasoline Outlet	\$230	\$150
Industrial General Permit	\$270	\$150



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Benefits of Compliance

- Educate area businesses on best management practices, stormwater, and local water quality issues.
- Ensure that less pollutants are transported to surface water through urban runoff.
- Cities and businesses aren't in jeopardy of receiving fines from the Regional Board or third party lawsuits from environmental groups.



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Thank you!



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