

Industrial Sites Task Force

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




Agenda

- Welcome
- Introductions of Task Force Members
- Remarks from Irma Muñoz, Chairwoman of the Los Angeles Regional Quality Control Board
- 5 Minute presentation from each task force members
- Comments and question

LA REGIONAL WATER QUALITY CONTROL BOARD

Compliance Assurance
 Stormwater Industrial General Permit
 &
 The Upper San Jose Creek Watershed Pilot Project



Background Stormwater Industrial General Permit

- Stormwater Industrial General Permit
 - Adopted in 2014
 - Regulates the discharge of stormwater from industries
 - Defines the types of industries that need coverage
 - Requirements include
 - Monitoring stormwater discharges
 - Implementing Best Management Practices
 - Good Housekeeping Practices
 - Protect activities and equipment from exposure to rain
- Currently 3,441 facilities enrolled

INSPECTION PERFORMANCE Stormwater FY 15/16 – 16/17

Permit Type	Facilities Regulated	FY 15/16	FY 16/17
		Inspections Completed	Inspections Completed
Const.	1,285	405	413
Indust.	3,088	610	857
Non-Fillers			208
Total Inspections		1,015	1,270

Background (cont.) MS4 Permit

Waste Discharge Requirements For Municipal Separate Storm Sewer System (MS4) Discharges

- 86 Permittees

Part VI.A.2.a requires that Permittees:

- hold dischargers to its MS4 accountable for their contributions of pollutants and flows through ordinances and permits
- use enforcement mechanisms to require compliance
- conduct inspections, surveillance, and monitoring to determine compliance
- require control measures or BMPs be in place and maintained

Background (Cont)

Part VI.D.6 requires that MS4 Permittees:

1. Implement an industrial/commercial facilities program designed to prevent discharge from causing a violation of Water Quality Standards
2. maintain a database of all industrial and commercial facilities that are critical sources of storm water pollution
3. notify the owner/operator of each site of the applicable BMPs
4. inspect critical commercial and industrial sources
5. require implementation of source control BMPs
6. use progressive enforcement to ensure facilities comply with storm water requirements

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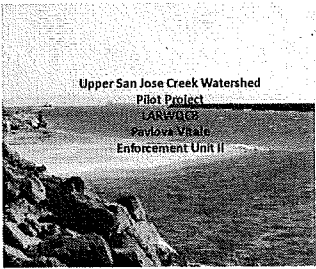
WASTE DISCHARGE REQUIREMENTS FOR MUNICIPAL SEPARATE STORM SEWER SYSTEM (MS4) DISCHARGES WITHIN THE COASTAL WATERSHEDS OF LOS ANGELES COUNTY, EXCEPT THOSE DISCHARGES ORIGINATING FROM THE CITY OF LONG BEACH MS4

Construction Plan Review and Approval Procedures

1. Each Permittee shall develop procedures to review and approve all construction plans submitted to the Permittee for review and approval. The Permittee shall review and approve all construction plans submitted to the Permittee for review and approval. The Permittee shall review and approve all construction plans submitted to the Permittee for review and approval. The Permittee shall review and approve all construction plans submitted to the Permittee for review and approval.

(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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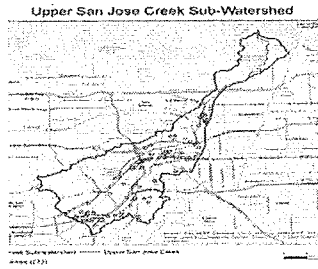


Upper San Jose Creek Watershed
Pilot Project
LARVACD
Pavlovsky Field
Enforcement Unit II

Pilot Project Activities

- Select the watershed
- Send notifications of MS4 audits
- Meet with non government stakeholders
- Identify and inspect potential non-filers
- Identify and inspect industrial permittees
- Determine each city's compliance with the MS4 Permit
- Determine the effectiveness of efforts in the watershed through monitoring receiving waters
- Progress Report

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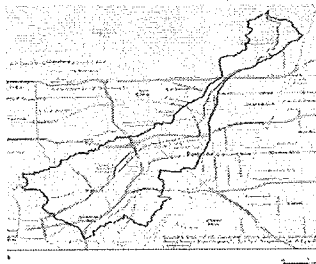


Upper San Jose Creek Sub-Watershed

Pilot Project Selection

- Outfall location
- Manageable for a pilot project: size - 34 square miles, 54 permitted facilities outfall location
- Drains an environmental justice area (Cal Enviro Screen)

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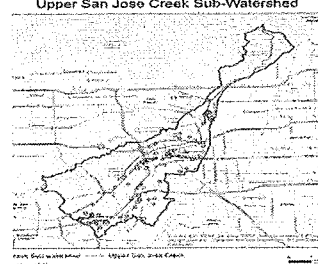


Upper San Jose Creek Sub-Watershed

Pilot Project Cities:

- Claremont
- Diamond Bar
- Industry
- La Verne
- Pomona
- Walnut
- West Covina
- LA County

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Upper San Jose Creek Sub-Watershed

Pilot Project Status

Permitted Facility Inspections

- 15 out of 56 facilities inspected

Potential Non-filer Inspections to date

- 176 facilities inspected
- 51 require IGP coverage

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Pilot Project - Next Steps

Continue with:

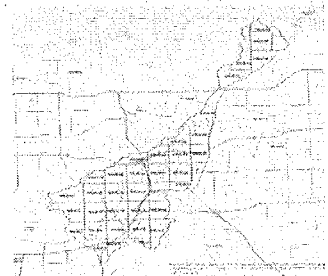
- Inspections
- Outreach
- Non-Filer Enrollment

Conduct:


- Targeted MS4 Audits
- Progressive Enforcement
- San Jose Creek Sampling

Write:

- Progress Reports



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Industrial Stormwater Compliance

Stormwater Funding Group

Bruce Reznik
Executive Director

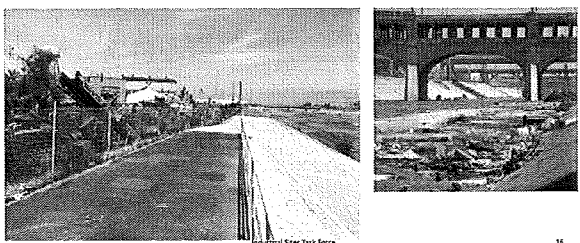
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About LA Waterkeeper



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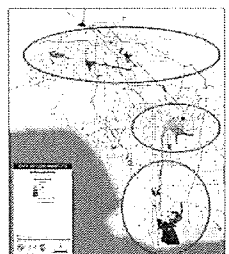
LA's Impaired Waterways



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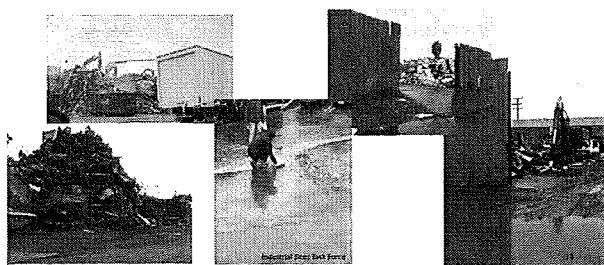
Urban and Stormwater Runoff:

Death by a Thousand Cuts



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Lack of Resources for Effective Enforcement



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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-Filers
 - Can't Clean Water Without Participation In Program
- CMC: Proactive and Part of Solution



James Simonelli, Executive Director
www.metalscoalition.com


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Stormwater Controls

- Storm Water Pollution Protection Plans

STORMWATER POLLUTION PREVENTION PLAN (SWPPP)

SA Engineering LLC dba SA Recovery
VOC# 439621107
Project: [illegible]
Industrial Site

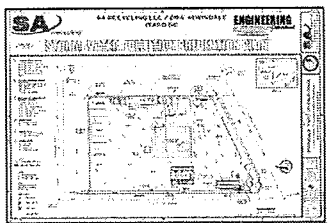


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Stormwater Controls

- Storm Water Pollution Protection Plans

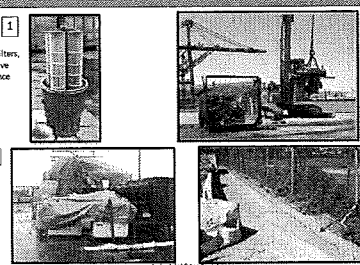


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Non-structural BMP Examples

- Cleaning filters, preventative maintenance
- "Mopping" along docks (schedule)
- Tarping material
- Replacing walkies and booms when needed

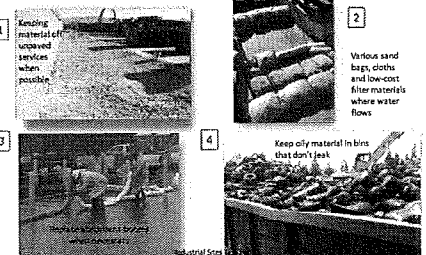


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Non-structural BMP Examples

- Reusing material of unneeded services when possible
- Wash sand bags, cloths and low-cost filter materials where water flows
- Keep oily material in bins that don't leak

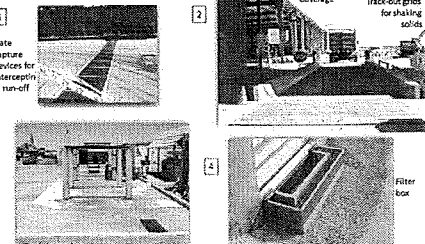


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Structural BMP Examples

- Gate capture devices for intercepting run-off
- Coverage Track-out grids for shaking solids
- Filter box



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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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Combination BMPs

1 Coating steel to prevent rusting

2 Adding filter cloth to structural filters

3 Adding filter cloth to structural filters

4 Coating steel to prevent leakage

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Vacuum Sweeping

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Material Storage

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Hazardous Waste Storage

Secondary Containment

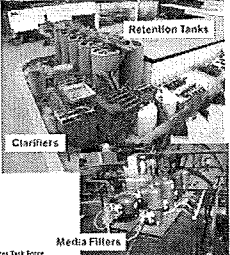
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Clarifier Maintenance

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Stormwater Treatment

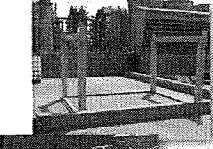
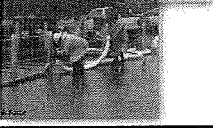
- Collection from yard and consolidation
- Settling
- Treatment Chemistry to encourage settling
- Media filtration, sometimes clay flocc
- Clarifiers
- Turbidity and in-field monitoring



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Stormwater Controls



- Facility grading/paving
- Collection sumps
- Underground plumbing
- Filtration System:
 - Retention/settling tanks
 - Chemical treatment
 - Clarifiers
- Media filtration
- Various Non-Structural BMPs

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Inspections/Enforcement

- Some cities do annual inspections.
- Enforcement
 - from complaints
 - NGO and private party enforcement.


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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 Councilwoman Judy Nelson




Bruce Reznik
Executive Director

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City of Glendora

- 2014 City hired a consulting firm, CWE, to assist with the administration of the industrial/commercial (I/C) facilities program
- CWE performs 2 inspections of each business in 5 years, including follow-up inspections for deficiencies in handling dry weather and stormwater runoff.
- 2nd Inspections are currently being conducted August thru October, 2017
- CWE has prepared and distributes an I/C Facilities Program Guidance Manual to inspected business owners.
- 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 have tenant improvements only:
 - They will receive a building inspection of permanent Best Management Practices (BMPs) and
 - Receive 2 Inspections in 5 years (2012-2017)
 - If it is a new development they will be required to provide:
 - On-site stormwater infiltration
 - A Stormwater Pollution Control Plan including on-site permanent BMP's and
 - will have 2 inspections in 5 years (2012-2017)



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.



Inspection Fees

The city implemented an inspection fee schedule to cover the cost of the consultant:

Facility Type	Inspection Fee	Follow-up Price
Restaurant	\$140	\$150
Automotive	\$240	\$150
Retail Gasoline Outlet	\$230	\$150
Nurseries		\$150
IGP	\$270	\$150
Non-Filers		\$150



Benefits of Compliance

- Educate area businesses on best management practices, stormwater, and local water quality issues.
- Ensures 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.



Thank you!



Questions?
Comments?