



Industrial Stormwater Violations focus on Hazardous Waste

Session Code: TH-H2

Check-in code: 6777

3/27/2025

Maxa Silva, EHS Specialist III



27th California Unified Program
Annual Training Conference
March 24-27, 2025

Introduction

- ACTenviro
- 10+ years of experience in EHS
- 4 years with ACT
- Qualified Industrial Stormwater Practitioner (QISP) in CA



27th California Unified Program
Annual Training Conference
March 24-27, 2025





OBJECTIVES

27th California Unified Program
Annual Training Conference
March 24-27, 2025



OBJECTIVES

- Understand the importance of storm water pollution prevention
- Know storm water regulations
- Understand Notice of Intent (NOI) vs No Exposure Certification (NEC) coverage
- Best management practices (BMPs)
- Avoid violations to the IGP



27th California Unified Program
Annual Training Conference
March 24-27, 2025



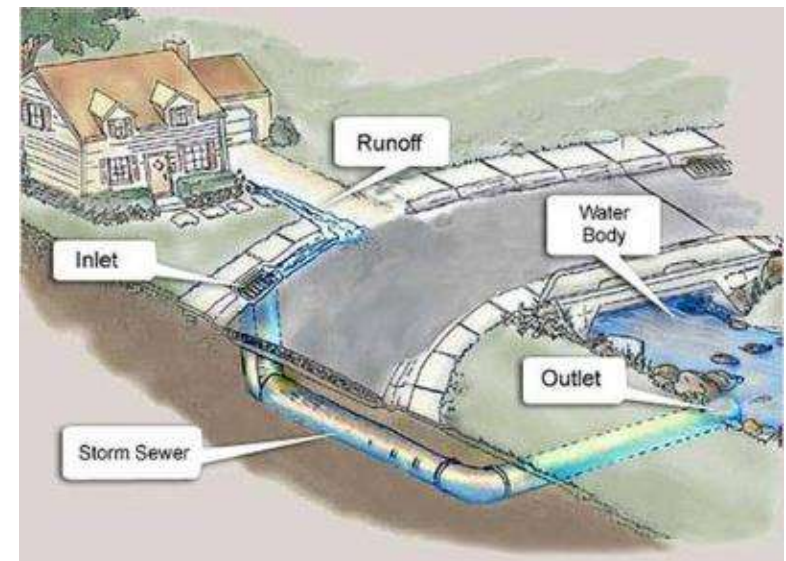
DEFINITIONS

27th California Unified Program
Annual Training Conference
March 24-27, 2025



What is storm water?

- Rain, snow or ice melt runoff
- Water with a final destination of a stream, river, lake or ocean
- Water that **does not** seep into the ground
- Water that **is** channeled by storm sewers and drains



27th California Unified Program
Annual Training Conference
March 24-27, 2025

What causes stormwater pollution?

- Oils
- Antifreeze
- Detergents
- Industrial waste
- Trash
- Dust
- Cigarette butts
- Animal droppings



27th California Unified Program
Annual Training Conference
March 24-27, 2025



More definitions...

- NEC – No Exposure Certification
- NOI – Notice of Intent
- IGP – Industrial General Permit
- SWPPP – Stormwater Pollution Prevention Plan
- SIC code – Standard industrial classification code



27th California Unified Program
Annual Training Conference
March 24-27, 2025





REGULATIONS

27th California Unified Program
Annual Training Conference
March 24-27, 2025



The Clean Water Act



- 1972: Environmental Protection Agency (EPA)
- Establishes framework for regulating storm water under National Pollutant Discharge Elimination System (NPDES) Program
- Federal Regulations:
 - 40 CFR Sections 122-125 – National Pollutant Discharge Regulations
 - 40 CFR Part 122.6 – Storm Water Discharges (Subject to NPDES program)
 - 40 CFR Subchapter N – National effluent limitation guidelines

27th California Unified Program
Annual Training Conference
March 24-27, 2025



Who controls California's storm water?



- Environmental Protection Agency (EPA)

- Federal Water Pollution Control Act (Clean Water Act)

- Section 402: National Pollutant Discharge Elimination System (NPDES) program

- State Water Resources Board

- Regional Water Quality Control Boards (RWQCBs)

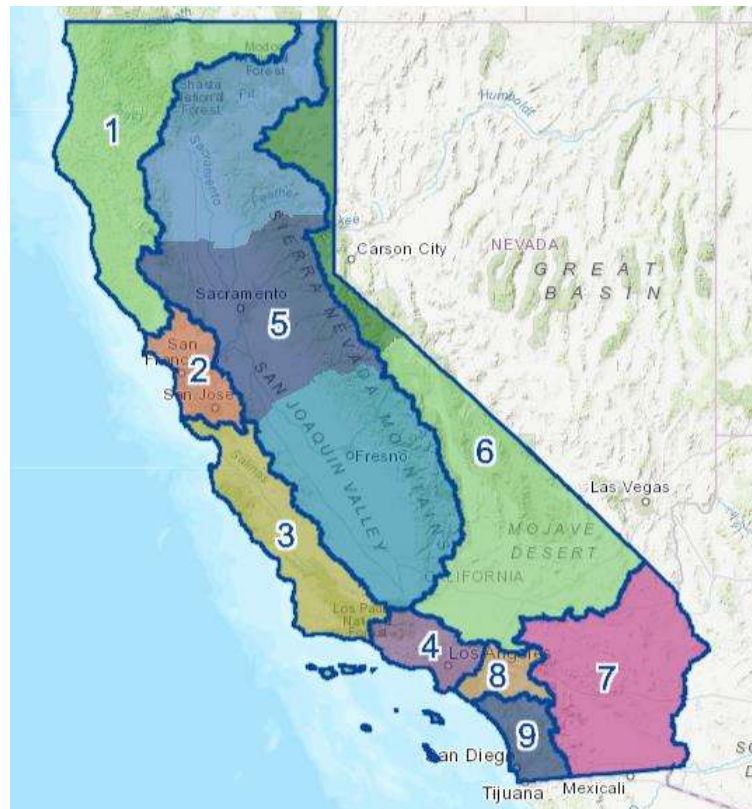
27th California Unified Program
Annual Training Conference
March 24-27, 2025



Who is your Regional Water Quality Control Board?



info#@waterboards.ca.gov



27th California Unified Program
Annual Training Conference
March 24-27, 2025



NPDES Program - Permits



1. Municipal General Permit

- Large and small municipal sewer system operators (military bases, hospitals, public campuses, etc.)

2. Construction General Permit

- Projects that disturb one or more acres of soil

3. Industrial Storm Water General Permit

(Order 2014-0057-DWQ, last amended in July 1,2020)

- Facilities must file a permit if they have a specific **SIC code** or conduct certain activities outdoors

27th California Unified Program
Annual Training Conference
March 24-27, 2025



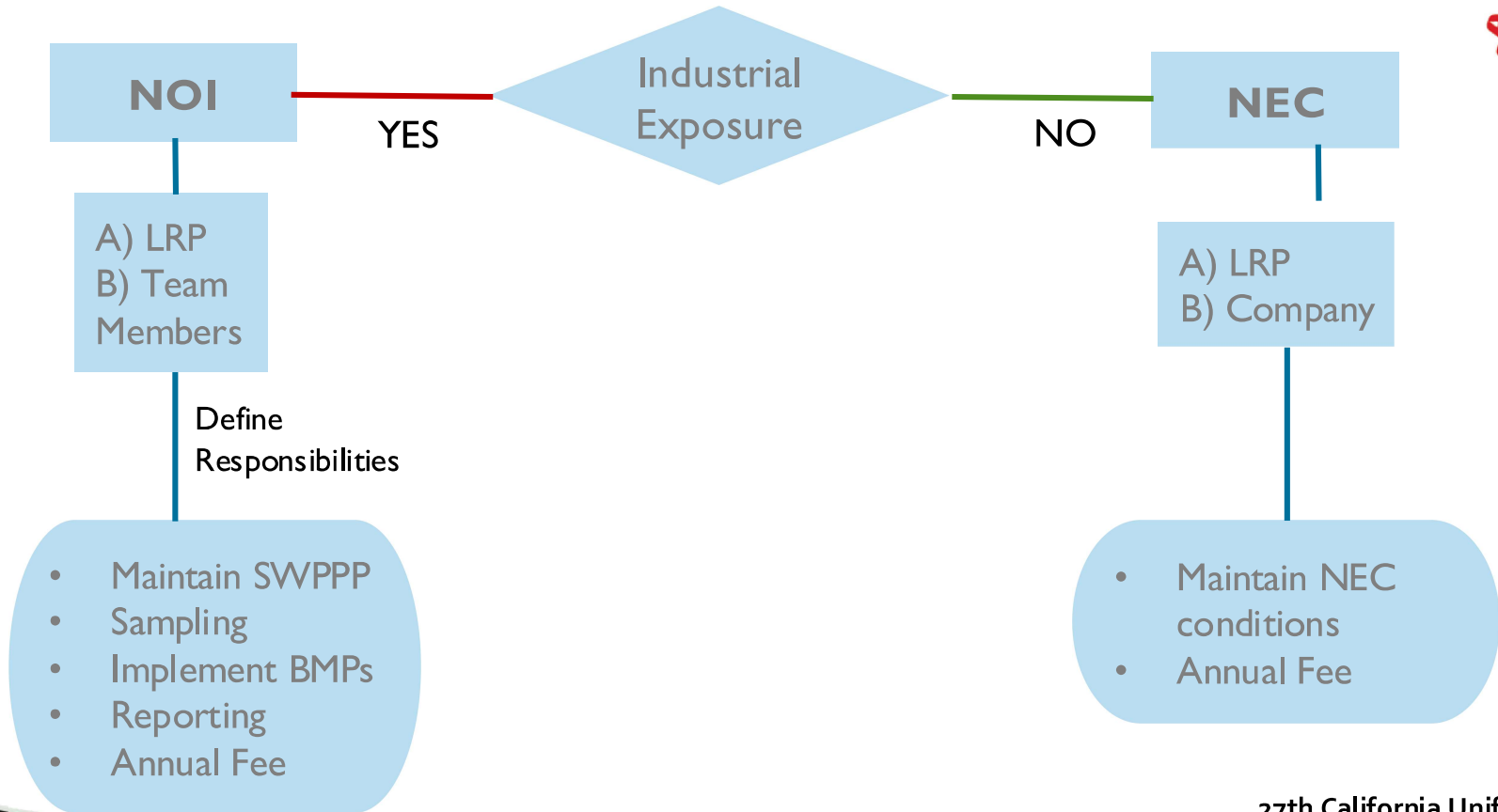


TYPES OF COVERAGE

27th California Unified Program
Annual Training Conference
March 24-27, 2025



Industrial Stormwater Permits



27th California Unified Program
Annual Training Conference
March 24-27, 2025



Industrial Stormwater Permits



Stormwater Multiple Application and Report Tracking System

SMARTS

<https://smarts.waterboards.ca.gov/>

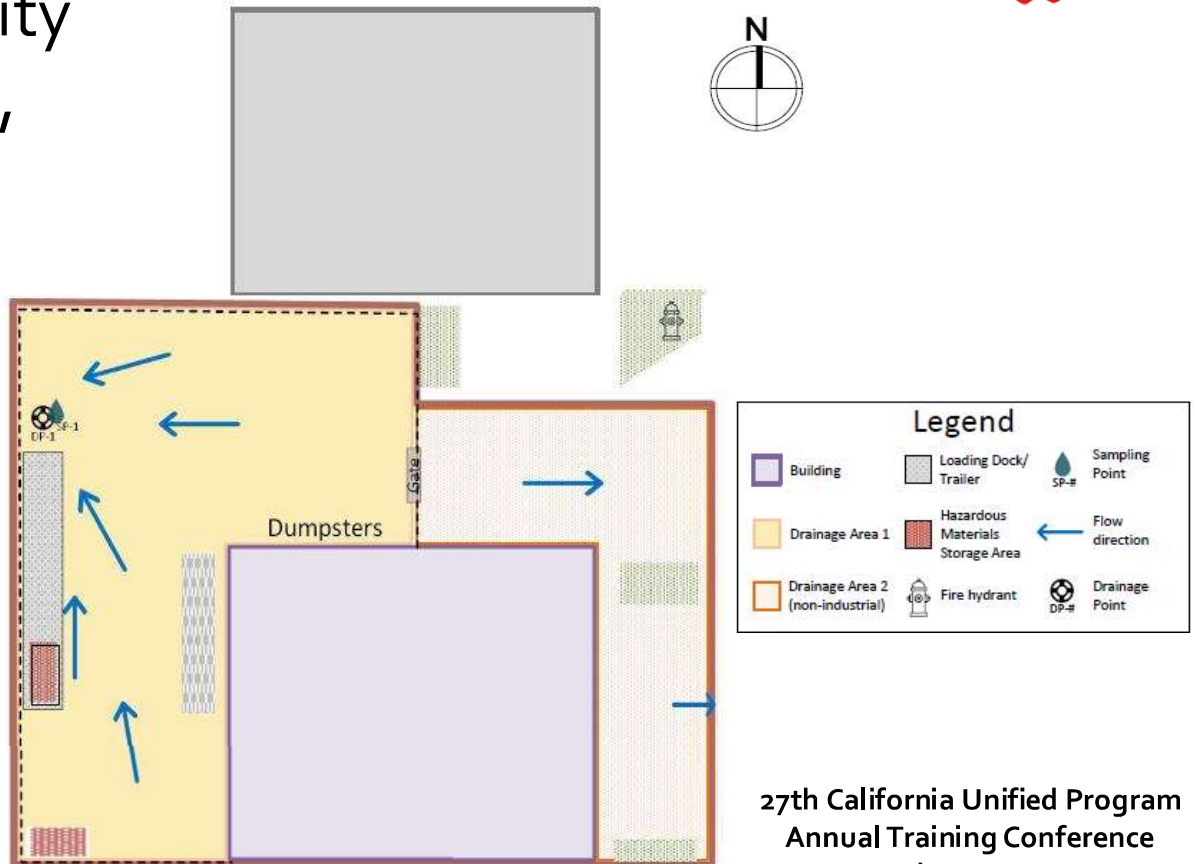


27th California Unified Program
Annual Training Conference
March 24-27, 2025

Real World Case #1

Transportation Facility
(HazMat, HazWaste,
Medical Waste)

- a) NOI or
- b) NEC?

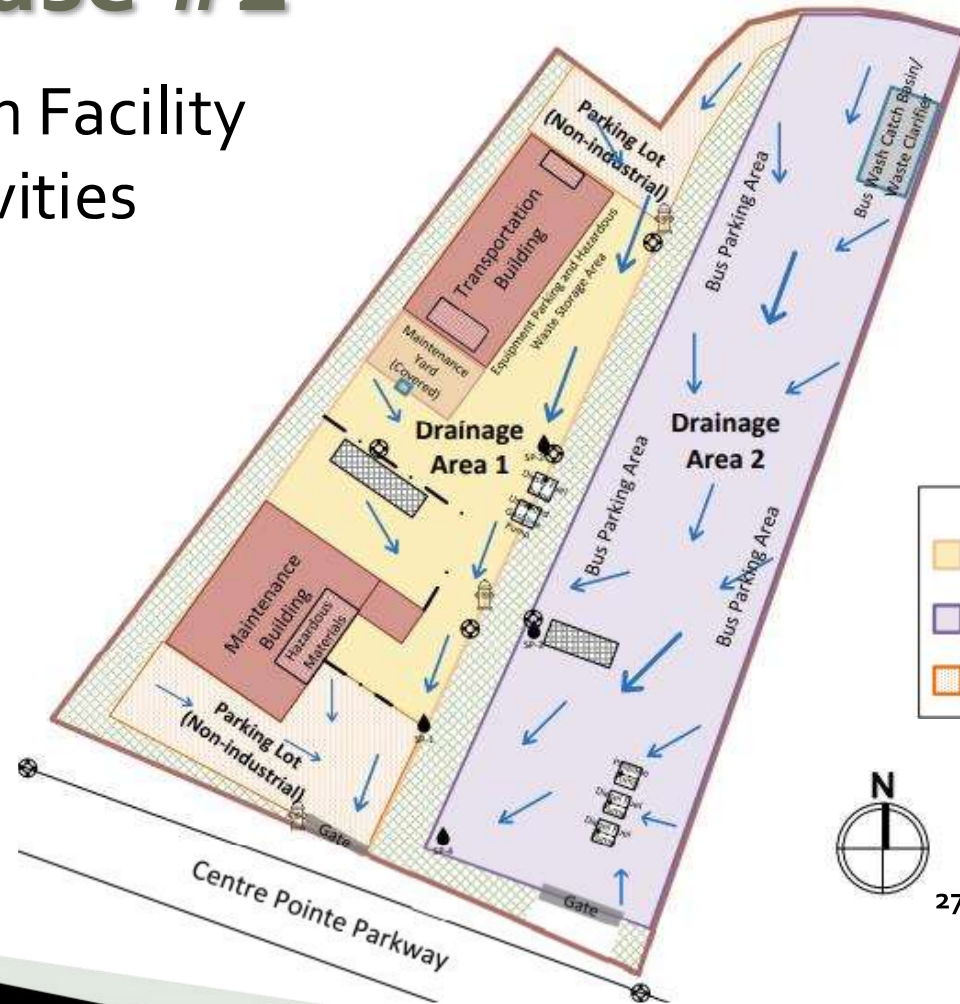


27th California Unified Program
Annual Training Conference
March 24-27, 2025

Real World Case #2

Transportation Facility
w/fueling activities

- a) NOI or
- b) NEC?



Legend		
Drainage Area 1	Hazardous materials storage area	Sampling Point SP-#
Drainage Area 2	Storage	Flow direction
Parking Lot (Non-industrial)	Waste Clarifier	Storm drain
		Fire hydrant



27th California Unified Program
Annual Training Conference
March 24-27, 2025



NOI coverage

- Storm Water Pollution Prevention Plan (SWPPP)
 - Possible sources of pollution
 - Best management practices (BMPs)
 - Storm water sampling team
 - Reporting requirements
 - Direction of flow of storm water
- A plan written by the facility or outside contractor.



Why are we sampling for?

- NPDES requires storm water sampling based upon:
 - Standard Industrial Code (SIC); or/and
 - Your facility's receiving waters
 - **Are you discharging to an impaired water (303d Listed Water Body) ?**
- The IGP outlines all storm water sampling specifications



Why are we sampling for?

- All facilities in the state of California filing for an NOI under the industrial general permit must sample for:

- Total Suspended Solids (TSS) → ELAP Certified Lab
- Oil and Grease (O&G) → ELAP Certified Lab
- pH → in-house



27th California Unified Program
Annual Training Conference
March 24-27, 2025



BEST MANAGEMENT PRACTICES (BMPs)

27th California Unified Program
Annual Training Conference
March 24-27, 2025



Where is your storm drain?



- Location
- Pollutants source



These are the connections to the nearest stream, lake, river, and/or ocean.

BMPs

- Dumpster Areas
- Outdoor Material & Equipment Storage
- Equipment Washing
- Vehicle & Equipment Maintenance
- Parking Lots
- Loading & Unloading
- Spill Response
- Authorized non-storm water discharges (NSWDS)



27th California Unified Program
Annual Training Conference
March 24-27, 2025

BMPs

- Dumpster Areas
- Outdoor Material & Equipment Storage



BMPs

- Equipment Washing
- Vehicle & Equipment Maintenance



27th California Unified Program
Annual Training Conference
March 24-27, 2025

BMPs

- Parking Lots
- Loading & Unloading



BMPs

- Spill Response
 1. BE PREPARED
 2. Know how to respond to a spill
 3. Know the location of the spill response equipment
 4. Prompt spill clean up



27th California Unified Program
Annual Training Conference
March 24-27, 2025

BMPs

- Authorized non-storm water discharges (NSWDs)
 - Water line/hydrant flushing
 - Dechlorinated swimming pool water
 - Landscape irrigation/lawn watering
 - Groundwater
 - Air conditioning compressor condensate
 - Uncontaminated footer drains
 - Drinking fountains



27th California Unified Program
Annual Training Conference
March 24-27, 2025

More BMPs



27th California Unified Program
Annual Training Conference
March 24-27, 2025



BREAK TIME!



27th California Unified Program
Annual Training Conference
March 24-27, 2025

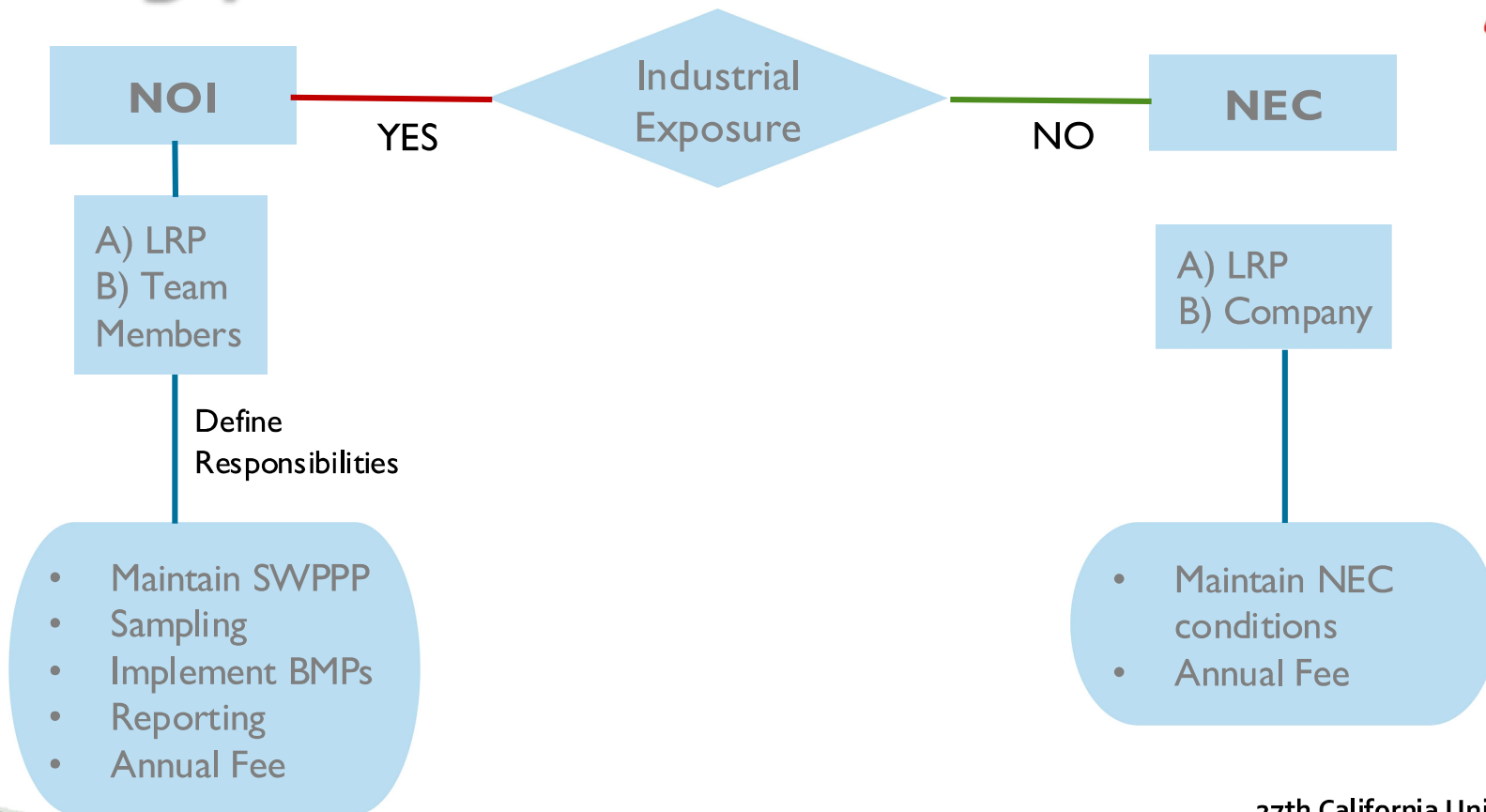


AVOID VIOLATIONS TO THE IGP

27th California Unified Program
Annual Training Conference
March 24-27, 2025



Defining your Role



27th California Unified Program
Annual Training Conference
March 24-27, 2025



Your Role



Storm Water Contacts

- State Water Resources Control Board
Storm Water Section
PO Box 1977
Sacramento, CA 95812-1977
- General Inquiries:
✉ stormwater@waterboards.ca.gov
☎ Toll Free: **1-(866)-563-3107**
- State and Regional Board Contact Information
- **Report a Storm Water Violation**
 - Report a Non-Filer - Let us know if a business does not have a Storm Water Permit.
 - Report a QSD/QSP (Construction General Permit Qualified SWPPP Developer/Qualified SWPPP Practitioner)

27th California Unified Program
Annual Training Conference
March 24-27, 2025



Your Role

- Cover dumpsters
- Use good housekeeping procedures
- Use secondary containment
- Minimize outdoor activities
- Notify, notify, notify



27th California Unified Program
Annual Training Conference
March 24-27, 2025

NOI - SWPPP up to date

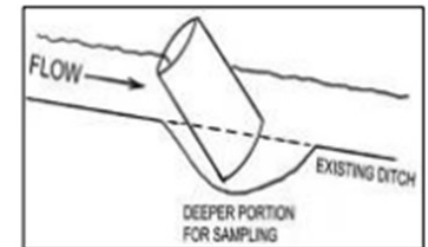
- Is there a SWPPP in place?
- Is the SWPPP up to date?
 - New processes?
 - New sources of pollution?
 - Site map?
 - New Team Members?
 - Certified in SMARTS?



27th California Unified Program
Annual Training Conference
March 24-27, 2025

NOI- Sampling

- What parameters are we sampling?
 - SIC code
 - Impairments
- Proper sampling techniques
- PPE
- Certified ELAP lab
- Recordkeeping
- Qualifying Storm Events
 - Two samples July-Dec
 - Two samples Jan-June
 - Representative sample?



27th California Unified Program
Annual Training Conference
March 24-27, 2025

NOI- Sampling

- What if I can't sample?
 - Not enough rain
 - QSE did not occur during facility operating hours
 - Event was not preceded by 48 hours of dry weather
 - Issues with sampling equipment
 - Dangerous weather or conditions

SAFETY FIRST!



27th California Unified Program
Annual Training Conference
March 24-27, 2025

NOI- Exceedances



- Based on level status
 - Baseline
 - Annual Comprehensive Evaluation and Report; by **July 15th**
 - Level 1
 - Annual Comprehensive Evaluation and Report;
 - Level 1 Exceedance Response Action (ERA) Plan; by **Jan 1st**
 - Level 2
 - Annual Comprehensive Evaluation and Report; by **July 15th**
 - Level 2 ERA Plan; by **Jan 1st**
 - Level 2 ERA Technical Report; by **Jan 1st**

27th California Unified Program
Annual Training Conference
March 24-27, 2025



NOI- Exceedances

- Advanced BMPs
- Eligibility for returning to Baseline
 - Status is assigned by parameter
 - Additional BMPs have been implemented
 - Four (4) consecutive QSEs with no additional exceedances
 - ERA reports **MUST** be prepared by a QISP



NOI- Implementation of BMPs

- Laboratory reports
 - ELAP certified
 - Results will be released within 1-4 weeks
 - Upload and Certify in SMARTS within **30 days**
- Retain copies for 5 years
- PPE
- Certified ELAP lab
- Recordkeeping
- Qualifying Storm Events
 - Two samples July-Dec
 - Two samples Jan-June



27th California Unified Program
Annual Training Conference
March 24-27, 2025

NOI- SMARTS Reporting & Recordkeeping



- Sampling and Analysis
 - ELAP certified
 - Results will be released within 1-4 weeks
 - Upload and Certify in SMARTS within **30 days**
- Monthly visual observations
- Sampling event observations
- Annual Reports
- Specific ERA reports
- All records **MUST** be retained for **5 years**
- **Pay annual fee**

27th California Unified Program
Annual Training Conference
March 24-27, 2025



NEC- SMARTS Reporting & Recordkeeping



- Maintain NEC conditions
- Recertify annually by Oct 1st.
- **Pay annual fee**

27th California Unified Program
Annual Training Conference
March 24-27, 2025





REAL WORLD VIOLATIONS

27th California Unified Program
Annual Training Conference
March 24-27, 2025



CASE #1

- Facility lost NEC coverage



27th California Unified Program
Annual Training Conference
March 24-27, 2025



CASE #2



- Corrective actions requested by the Board.

To demonstrate compliance with the Industrial General Permit, submit the following documents to the Attachments in SMARTS no later than **11 April 2025**:

1. Photos showing that trash and debris have been cleaned up around the site.
2. Photos showing that the temporary bins have either been removed from the site or covered.
3. Upload an updated SWPPP and map that includes the stormwater pipe conveyance and new facility information.



27th California Unified Program
Annual Training Conference
March 24-27, 2025



CASE #3

- Corrective actions requested by the Board.

Even though the site is in baseline status for all required parameters, it is recommended that you re-evaluate your BMP installed at sample location SP-1 as the amount of runoff that flows through this location could render the BMP ineffective quickly.

In response to these inspection findings, please complete the following:

- Install and maintain perimeter sediment control BMPs in both sample locations SP-1 and SP-2 (see Inspection Report Photos 1 and 2). Ensure that the BMPs are installed to capture any runoff from the Site.



27th California Unified Program
Annual Training Conference
March 24-27, 2025

GOOD NEWS!

- A Facility can move from NOI to NEC coverage as soon as no exposure conditions are met.



27th California Unified Program
Annual Training Conference
March 24-27, 2025

Summary

- Storm water pollution prevention is everyone's responsibility
- Know your Role in your company and the community
- Know the type of coverage at your site
 - NEC
 - NOI
- Continuous implementation and maintenance of B
- Identify new sources of pollution
- If uncertain.....Notify, Notify, Notify



27th California Unified Program
Annual Training Conference
March 24-27, 2025



Any Questions?

Maxa Silva, EHS Specialist III, ACTenviro
m.silva@actenviro.com

Check-out code: 8845

**27th California Unified Program
Annual Training Conference
March 24-27, 2025**

