Even industrial facilities need spring cleaning sometimes

Spring has finally arrived, and as the flowers begin blooming, warm weather rolls into town, and occasional spring showers and soft breezes stir through your facility, doesn't that turn your mind to wanting a fresh outlook and start? But at an industrial facility, what does that look like for you? In this month's edition of **The Rain Events**, we will be looking at three ways you can do a bit of spring cleaning at your facility and take advantage of this lovely spring weather after several months of winter gloom. Not only will this be beneficial to your storm water program and help you comply with the Industrial General Permit (IGP), but it will make your facility look polished and welcoming.

Trash: The first step to spring cleaning is getting rid of the old run down things and garbage and starting fresh. This allows for the rest of the cleaning to be more thorough and effective since you won't have to clean around the junk. Not only does trash dispersed around the facility make the site appear messy and unappealing, but it can also wash into the storm water system, get blown away by the wind, or invite pests to take up residence at the facility. Not to mention the attention it attracts from storm water or city inspectors who are on the lookout for trash violations which could cause your facility to end up with some serious corrective actions or fines. One of the best ways to keep this from happening is to clean up trash, industrial activity debris, or litter migrating onsite from external sources (like homeless encampments, public littering, or busy thoroughfares) and then maintain all the spring cleaning you did over the rest of the year and make sure old issues with trash don't pop back up.

Sometimes the task of trash management on an industrial facility may seem beyond feasible because of the trash generating activities which might be happening on a grand scale (think a recycling facility, an auto dismantler, or a waste facility), but there are some things you can do to keep a facility trash free even in the face of seemingly insurmountable odds. The biggest way to decrease the volume of trash leaving your facility is to keep containers, stockpiles, and garbage bins covered. By keeping these covered, wind dispersion can be kept to a minimum. While it may be a hassle to keep everything wind-proof, this is one of the biggest ways to prevent further trash pollution. Not only does covering trash keep the wind from scattering it hither and yon, but it also protects rainwater from penetrating and collecting potential pollutants through secondhand contamination by coming into contact with a pollutant source in the garbage pile. According to the IGP, an industrial facility is required to *"cover industrial waste disposal containers and industrial material storage containers that contain industrial materials when not in use,"* and *"divert run-on and storm water generated from within the facility away from all stockpiled materials."* Basically, if it could possibly cause a trash issue—cover it. Successful trash programs depend on effective training of employees on good housekeeping practices, applicable BMPs, and general pollution prevention plans. Covering, dealing with issues as they arise, and keeping everything neat and tidy will be your best route for effective and successful

trash management.

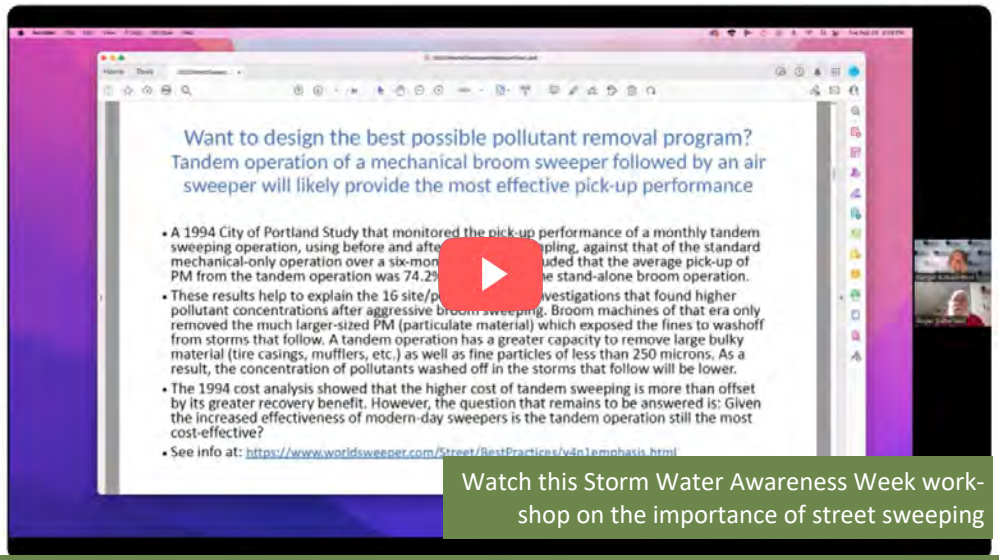
Is A Tarp An Acceptable Covering For Dumpsters?

An acceptable and helpful BMP which falls under the umbrella of good housekeeping are storm-resistant shelters over dumpsters or bins. The definition of a storm-resistant shelter is found in Section VII, which is the part of the Permit which deals with No Exposure Certifications (NECs). However, there is a much more succinct definition in Section B.3.e of Appendix 2: Storm-resistant shelters include: (1) completely roofed and walled buildings or structures, (2) structures with only a top cover (no side coverings) supported by permanent supports, provided material within the structure is not subject to wind dispersion (sawdust, powders, etc.) or being tracked out of the facility, and is not a source of pollutants in the industrial storm water discharges. Some may ask if covering materials with a tarp constitutes a rain-resistant shelter for facilities claiming NEC status. However, according to Section B.4.f of Appendix 2, this is acceptable *only* during construction or renovation activities, and not for materials which are subject to wind dispersion. Also, these "temporary shelters" may *only be used as necessary*, for a period of ninety days or less, and only until a permanent storm-resistant shelter is available. For more details, see Sections B.3.e and B.4.f of Appendix 2 in the Industrial General Permit.

Sweeping: Not only is street sweeping one of the most cost effective and efficient BMPs, but it is probably one of the oldest! Street sweeping was first invented by English engineer, inventor, and philanthropist Joseph Whitworth who created the first model of a mechanical street sweeper in 1843. His street sweeper was horse drawn and made up of a large drum covered in stiff wire bristles that would brush debris (horse poop) onto an elevator system and into a storage area. In 1849, C.S. Bishop brought a similar invention to the United States. Today, mechanical sweepers and vacuum/air sweepers are common sights at facilities to help keep the pollutant load under control and keep the facility looking spotless. But is street sweeping really that effective and important? Aside from aesthetic purposes, street sweeping matters for a variety of reasons. When a lot of industrial activities are occurring that generate fine dust and debris, sweeping is crucial for controlling the airborne spread of fine particulate matter from wind or trackout. It's especially important during the wet season when pollutant dust gets liquified in a storm event and washes down the drain. Debris like organic matter, metals, trash, microplastics, toxics, bacteria, and more can be collected by sweeping. Fortunately, pollutants like sediment are almost always visible, and can be cleaned up fairly easily.

As has been discussed in this newsletter numerous times, often we have noticed a direct link between total suspended solids (TSS) and other pollutants – high TSS tends to correlate with high concentrations of metals, nutrients, and toxic substances. So, staying on top of any loose sediment, dust, or dirt on the paved areas of the facility can have the added advantage of keeping other pollutants under control.

Microplastics are also becoming a big water quality concern, and even though it is not currently a regulated monitoring parameter in the Industrial General Permit, street sweeping will serve a dual purpose of removing these small particles while cleaning up other pollutants. This up-and-coming pollutant has vast detrimental effects on wildlife and human health and because of plastic's lack of degradation, it's only accumulating into a bigger problem as time progresses.



Watch this Storm Water Awareness Week workshop on the importance of street sweeping

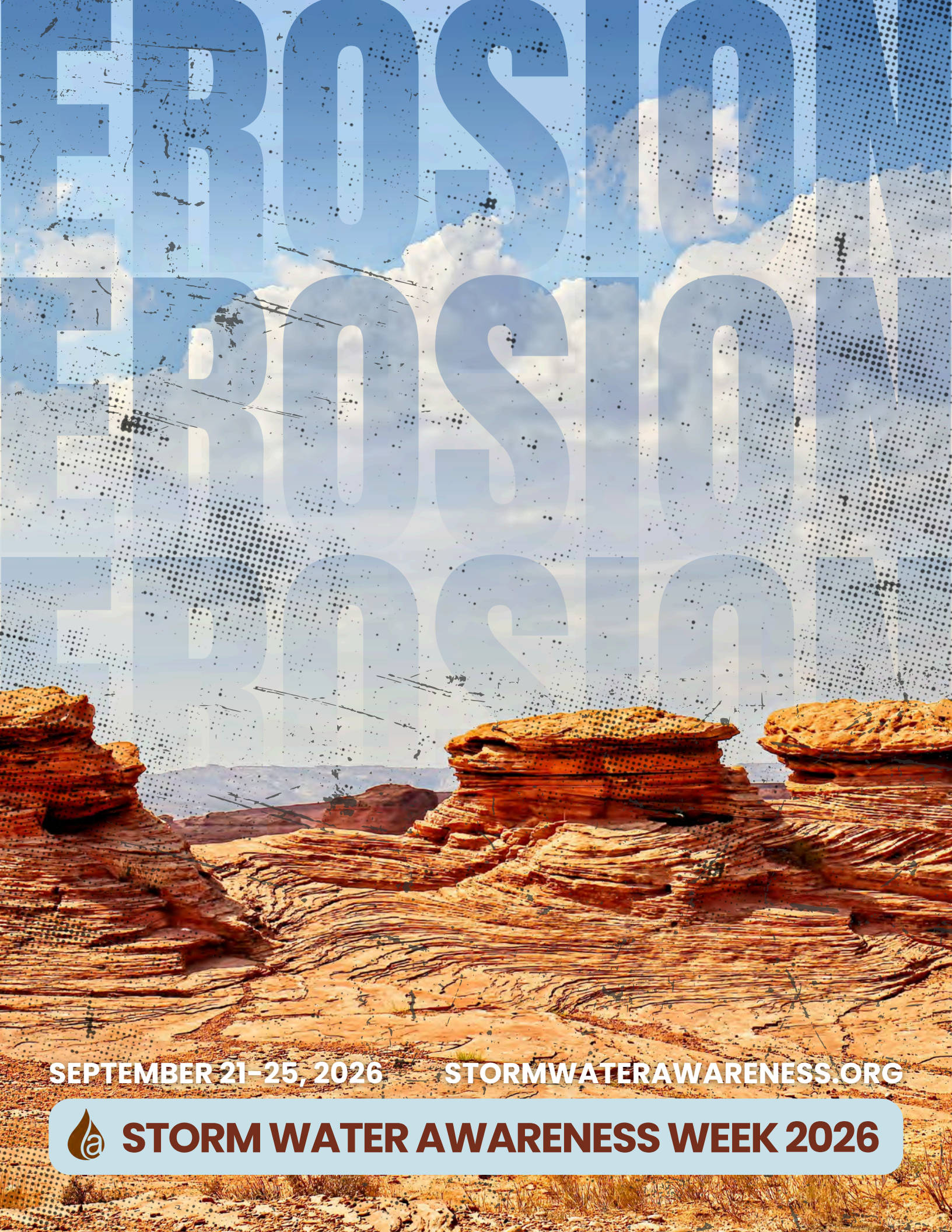
BMPs: After a long winter of wet and harsh conditions, BMPs around your facility may not be at their finest. And as we look ahead to sunny and hot summer days with a lot of solar wear and tear, your BMPs will likely have a very short life ahead of them based on what they've already had to weather. So, before summer arrives, it's a good idea to clean out the pollutants which accumulated in your BMPs over the winter. Refresh your site with new compost socks or straw wattle. Clean out or replace drain inlet inserts and filtration systems or devices. It's also a great time to start working on adding new advanced BMPs to your facility that you've been eyeing for your storm water program—things like permanent or temporary cover, retention ponds, treatment controls, filtration devices, etc. Have you been tossing around some ideas of how to improve your sampling results? Act on it now – as this rainy season comes to a close and before the next one starts. Don't wait around too long to start these projects, because often they take longer than anticipated and you'll want these completely installed before the rain season returns. The more storm water that can be captured, evaporated, infiltrated, retained, and cleaned prior to it leaving your site, the better the sampling results will be. And if you can get your industrial activities under cover, that's all the better because it reduces the pollutant source.

So, get that spring in your step and start working on cleaning your facility and making it ready for summer. Not only will it be rewarding in the long run for your storm water program, but it will also pay off in the short term for the aesthetic appeal and cleanliness of your facility.

The Rain Events

Lead Editor: John Teravskis
QSD/QSP, QISP, CPESC, ToR, IGPTT Participant
jteravskis@wgr-sw.com
(209) 334-5363 ext. 110 or (209) 649-0877

Supporting Editors:
Aaron Ortiz, QISP, ToR, aortiz@wgr-sw.com
(209) 334-5363 ext. 114
Rebekah Burnett, rburnett@wgr-sw.com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Storm Water Contest...

Each month, we invite our readers to participate in a contest to test their knowledge of the Industrial General Permit and show their storm water compliance program. We enter all submittals to our monthly newsletter question into a drawing and one person is selected at random to receive a $25 gift card.

What other pollutants have a correlation with iron?

Congratulations to Matt who answered, *"Other pollutants that have a correlation with iron are: Total Suspended Solids (sediment), Nitrates and Nitrites."* We hope you enjoy your next project with supplies from Home Depot.

...This Month's Contest

What kind of spring cleaning does your facility do?

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, April 10th. Email your answer to jteravskis@wgr-sw.com. One winner will be selected by a random drawing to receive a $25 gift card to Amazon.

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