

the Rain events

is your facility ready? **WINTERIZATION**

It's time to get ready for rain! Make sure the “first flush” doesn't cripple your storm water program.

► **COVER YOUR TRASH:** Waste bins are present at most facilities, and while it may be convenient to have them open for employees to readily be able to use, they present a couple of wet weather hazards to water quality. Most bins are not water tight. Rain that falls upon



► Powered sweepers are a great way to keep your facility clean. One of our clients is making sweeping extra fun with “Lightning McClean.”

In some colder States, the process of winterizing involves purging outdoor plumbing systems, putting up storm doors and window shutters, and stocking up on firewood, that is not usually something we do in California and certainly not at industrial facilities in California. But that does not mean that industrial facilities, especially those under the Industrial General Permit (IGP) shouldn't get ready for winter. This month's edition of the Rain Events is going to provide some tips to prepare for California winter conditions, which means RAIN!

them gives the collected trash and debris a good washing which then exits the bin at the bottom. Depending on what is disposed of at an industrial facility, this water may pick up pollutants that get carried into the facility's storm water drainage system.

Pollutants may include Biological Oxygen Demand (BOD) and pH altering substances, metals, dissolved solids, oils & greases, and pathogens. Open waste bins are also vulnerable to windy conditions which can blow lighter materials out of them. Although the solution is obvious, it is not always an easy fix. Tarps can be problematic in that they fill up with water, blow off, or are appropriated for makeshift housing. Finding a cover that is doable is tricky. Some waste bin providers have started equipping bins with covers, but many facilities end up placing bins under a more permanent rain proof cover or structure.

► **SWEEP UP:** It's been a long, dry year. Which means dust. And trash. Before the rain has a chance to wash those pollutants down your storm drain, send somebody out with a broom or streetsweeper to clean up your facility lot. A little Good Housekeeping (it's a BMP!) can go a long way toward keeping your analytical results under control. You're sweeping up more than just dust – tire particles, metal particles, chemicals, and so many other particulate pollutants could be lurking on your parking lot. Don't let them get into your storm water runoff!

► **MOVE THINGS INSIDE:** Most facilities have outdoor material storage areas. With the rain coming, now is the time to think about covering those materials being stored outside. When it rains, everything that gets wet at your facility is a potential source of pollutants, and in the event of a NAL exceedance, could end up costing a lot of money to remedy. Waste materials are not the only potential sources of pollutants. A stack of new tires could elevate your zinc numbers. Those bins of scrap metal

► *Are those rock bags or mud?* If your BMPs look like this, it's time to replace them and clean up the surrounding area—or risk an NAL exceedance.



can result in high amounts of iron. Wood pallets can raise your BOD. Before it rains, move as many outdoor materials as possible under cover, or cover them with a storm resistant shelter. Even a sturdy tarp is better than nothing!

► **REPLACE BMPs:** Did you know your BMPs can actually pollute storm water runoff? Yes, those rock bags, compost socks, drain inserts, and fiber roll can get you in trouble. If your BMPs have done their job, they've captured a lot of pollutants from previous storm events. If they're past their prime and have not been maintained, you're risking a BMP failure which could release all those trapped pollutants into your storm water runoff. Most non-structural BMPs (those drain inserts, compost socks, fiber roll) should be changed once per year before the storm season. Structural and engineered BMPs (filtration devices, oil/water separators, retention basins) should be inspected and maintained as necessary to prevent failure.

► **TRAIN YOUR TEAM:** Most facilities forget that training is as much a Best Management Practice as a compost sock. Improper or insufficient training can actually severely affect your storm water numbers. A few years ago, we were assisting a client who had extremely high analytical results for iron, TSS, and a few other pollutants. We eventually discovered that the employee in charge of sampling was collecting storm water

samples from the process water pond, because "it had more water than the sampling point." An innocent mistake resulting from improper training, sure. But two years collecting samples in the wrong location resulted in our client getting raised to ERA Level 2. Those of you at Level 2 status know just how expensive that path is. It's imperative to properly train employees in all aspects of preventing storm water pollution and collecting storm water samples.

► **WHY IT MATTERS:** By now, most facilities are aware of Numeric Action Level exceedances. And for those facilities required to sample for things like copper or zinc, they know that NALs are almost unachievably low. There are two types of NALs—*instantaneous*, and *annual average*. Even just a single BMP failure could cause you to exceed both, launching your facility into ERA Level 1 or Level 2. If your BMPs look like the rock bags pictured here, you're essentially playing with dynamite when it comes to storm water regulations. Don't wait to replace your spent BMPs! As we're writing this article, Northern California is in the middle of our first winter storm. These early storms are vital for your facility's storm water numbers. Usually the first flush is the worst pollutant load you'll experience all year, and if your numbers are especially high, you may not be able to recover enough to prevent an annual average NAL exceedance.

So get ready for rain – go sweep your facility, cover your trash bins, move materials inside, clean up your BMPs, and train your staff. If you need help or more customized storm water guidance, reach out to us!



Speaking of training... Storm Water Awareness Week is chock full of free training classes for industrial facilities. The event is over, but you can still watch the recordings for free. Check out these workshops!

- [Uh oh, I'm over my permit limits... now what? Nine sites that got it fixed, and how you can too.](#)
- [Industrial Stormwater Treatment: The Top 5 Pitfalls to Avoid!](#)
- [Designing an Industrial Stormwater System: Concept to Completion](#)
- [IGP Basics Part 1: What is the IGP?](#)
- [IGP Basics Part 2: What am I expected to do?](#)
- [IGP Basics Part 3: Sampling](#)

Visit stormwaterawareness.org to watch dozens of other workshops on municipal and construction topics, along with the five keynote sessions celebrating ten years of free storm water education.

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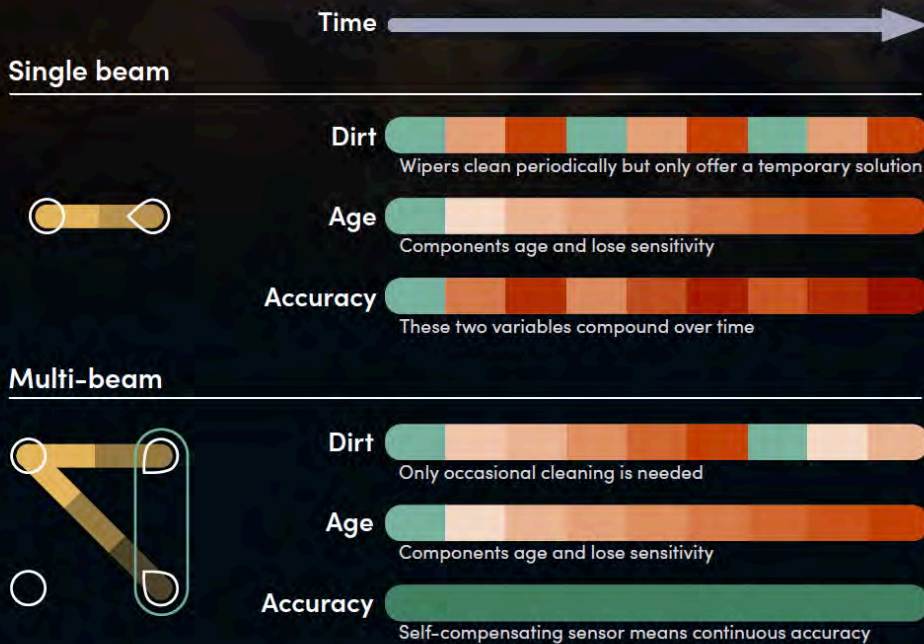
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FOR
RAIN

AND WHILE WE'RE PRAYING FOR RAIN, IS THERE ANYTHING
YOU'D LIKE US TO PRAY FOR YOU AND YOUR FAMILY?

GALATIANS 6:2

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