

## a love letter to your facility

### **Show Your Facility A Little Bit of Love!**

'Tis the month of love and chocolate and hearts. While Valentine's Day may be in the past already, we can still show those we care about how much they are loved. Speaking of telling people how much you love them, when was the last time you told your facility "I Love You"? I love you comes in many different forms, and for a facility it can look like a storm water program refresh. In honor of Valentine's Day, this month's edition of **The Rain Events** is going to give you four helpful ways with which you can tell your facility "I Love You!"

### **1. Maintenance:**

One of the easiest ways you can show your industrial facility some love is by doing maintenance and upkeep. A little elbow grease is just what your facility might need.

**Refresh & Replace** – BMPs that were once effective may no longer be effective after months of use and weathering. For example,

over time, gravel bags or compost socks can fill up with sediment and can actually become a source of pollutants. Textiles used for these types of BMPs tend to weaken and break down with age and exposure to sunlight and weather. Torn textiles expose filtration material and previously trapped sediment to storm water runoff. Show your facility a little TLC by inspecting any gravel bags, drain inlet filters, compost socks, or fiber rolls for structural integrity. Give them a kick to see how much sediment comes out of them. If they appear to be structurally sound but just dirty, you can try rinsing them with water. Just be sure that you do it in a way that keeps the dirty water and accumulated sediment from flowing into the drain inlet or off site. Usually, it is less of a hassle, less expensive, and more efficient to just replace them with new ones. Plus, brand new BMPs will give your facility a well-looked-after appearance!

little love by carefully inspecting it and making a note of anything that needs repair or maintenance. For example, a trail of oil drips across your facility from a forklift will need to be cleaned up, and the forklift which is dripping oil should be repaired. Try to coordinate maintenance and cleanup efforts to occur before a rain event happens to prevent further pollution and help reduce the risk of NAL exceedances.

**Cover It** – The most important display of love you can give your facility is trying your best to cover up pollutant sources. The IGP requires that all stored industrial materials which can be mobilized by contact with storm water be covered. All waste containers and industrial material containers must be covered, not just when it is raining, but according to the IGP, they also need to be covered when not in use. If you can feasibly keep your pollutants covered and not exposed to any storm water, we highly recommend doing that! It's worth the hassle of figuring out where to keep everything. In addition, dischargers are required to apply advanced BMPs which include the use of "storm resistant shelters that prevent the contact of storm water with the identified industrial materials or areas of industrial



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activity.” It’s also a great idea to cover areas of potential soil erosion. The IGP requires stabilization of all erodible areas. This can be achieved by covering them with crushed rock, wood mulch, vegetation, paving, a structure, or some other method that places a non-erodible “cover” on top of the erodible surface. Keeping your industrial materials and erodible surfaces covered and dry will make for a happy facility and happy Water Board.

## 2. Paperwork:

Now that you’ve got the facility itself looking great, let’s give some careful attention to your facility’s paperwork. First, a SWPPP review may be in order. If your facility’s SWPPP was not created or reviewed by an IGP professional, it would be a great idea to catch your paperwork up to speed with the current regulations and requirements. Showing some attention to your SWPPP will ensure that your facility is still in compliance with the current Industrial General Permit.

While you’re working on bringing your paperwork up to speed, now would be a great time to make sure your facility staff have had their annual Industrial General Permit training to ensure they are familiar with the Permit’s monitoring compliance requirements. *PS – don’t forget that snacks, donuts, and coffee are a great way of telling your team that you care about them too!*

## 3. Legal:

No one likes the idea of possible legal hassles, so an ounce of prevention is worth a pound of cure in this department. Third party litigations are not something to mess with – they can be costly, painful, and potentially fatal to a facility. One of the best ways you can show how much you love storm water and your facility is to attempt to stay below the NALs and establish practices which will help your facility stay out of the danger zone.

**Stay Within Benchmarks** — The State says that exceeding benchmarks does not automatically mean a business is violating the IGP. However, third party environmental organizations like to target facilities with benchmark exceedances. Make sure you only sample “qualifying storm events”; if a storm doesn’t qualify, there’s no requirement to sample it. Remember to practice good sampling techniques — samples that are collected from puddles or are collected

carelessly can result in higher analytical results and benchmark exceedances.

### **Implement BAT/BCT and Practice the Iterative Approach** —

Dischargers are required to implement BMPs, test their discharge, compare sampling results to benchmarks, and take corrective action if benchmarks are exceeded. This is called the iterative approach. Always take corrective action when benchmark exceedances occur and document the action taken. Also, don’t go cheap on BMPs. You might think spending \$10,000 on additional BMPs is outrageous, but how does that compare to a \$25,000+ settlement fee?

### **Minimize Exposure and Discharges** —

Storm water compliance is all about location. A location that can obtain an NEC or impound storm water and prevent a discharge is preferable. But that’s not exactly feasible for most facilities; so, it might be good to consider how your facility can capture and reuse storm water. If space is an issue, you can try routing at least some of the storm water through a mini-impoundment or vegetated area to capture and treat the accumulated water from smaller storm events. If you can’t cover all your industrial activities, can you cover some of them? It’s better to have some covered, than none at all. If your facility can’t accommodate any kind of storm water capture or NEC situation, then it might be wise to consider moving to a new location if your storm water sampling results keep having numeric action levels exceedances. Moving to a new location can seem a bit extreme, but dealing with third party litigators can be as expensive (if not even more expensive) than moving. Unfortunately, settling one lawsuit doesn’t guarantee smooth sailing in the future. A few years ago, a facility was threatened to be sued by a third-party litigator. Even though they reached an expensive settlement, several years later, the same litigation party (under a new name) sued the same facility again. Only this time, the lawsuit was a fatal blow to the facility, who ended up shutting down operations and moving to Mexico. Reducing exposure and discharges can go a long way in fending off lawsuits and keeping your facility doors open.

## 4. Inspections & Sampling:

The fourth way to show your facility some love would be to collect your facility’s remaining storm event samples. You only need to sample two more storms during the next four months, so be on the lookout for qualifying ones! Don’t keep postponing sampling. If the storm is qualifying (and it’s safe to do so), get out there and sample. If you collect a storm water sample, be sure and process the sampling Ad Hoc reports on SMARTS. Along with sampling, be sure and fulfill the monthly visual observations requirement of the Industrial General Permit. Every month, the discharger is required to visually observe each drainage area. These observations have to be made during business hours while there is no rain. The permit says these inspections are to be performed during daylight hours on days without rain. One of the purposes of these inspections is to determine if there are any non-storm water discharges (NSWDs) occurring at the facility, or if any industrial materials are causing a pollution problem. These inspections have to be done during business hours so that actual operations and activities are observed and noted. Staying on top of your inspection and sampling requirements will make a world of difference come annual reporting time.

Remember, actions speak louder than words! A little love, a little care, and some good housekeeping practices will leave your facility looking fresh and cared for—not to mention the benefits showing your facility a little love does for the betterment of water quality. Take a little time before the month ends and tell your facility “I Love You”!

*And let us know in this month’s contest what you did to show love to your facility for a chance to win a \$25 gift card to Krispy Kreme.*

## The Rain Events

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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. Last month's contest question was:

*What type of facilities are required to sample for copper?*

Congratulations to Marco who replied *“Facilities that have lead pipes and copper lines with lead solder or served by lead lines.”* Marco, we hope you enjoy a delicious steak dinner from Outback Steakhouse!

## *...This Month's Contest*

*How did you tell your facility “I Love You” in the month of February (or early March)?*

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, March 15th. Email your answer to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). One winner will be selected by a random drawing to receive a \$25 gift card to Krispy Kreme.

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