




SMCWPPP Commercial/Industrial/Illicit Discharge (CII Subcommittee) Inspector Training

Commercial/Industrial Stormwater Inspection Basics: Inspection Process (Module 2)

August 2020



Outline

- **Regulatory Overview (Module 1)**
- **Inspection Process**
 - Planning 
 - Inspections 
 - Recordkeeping 
 - Best Management Practices
- **Resources (Module 3)**

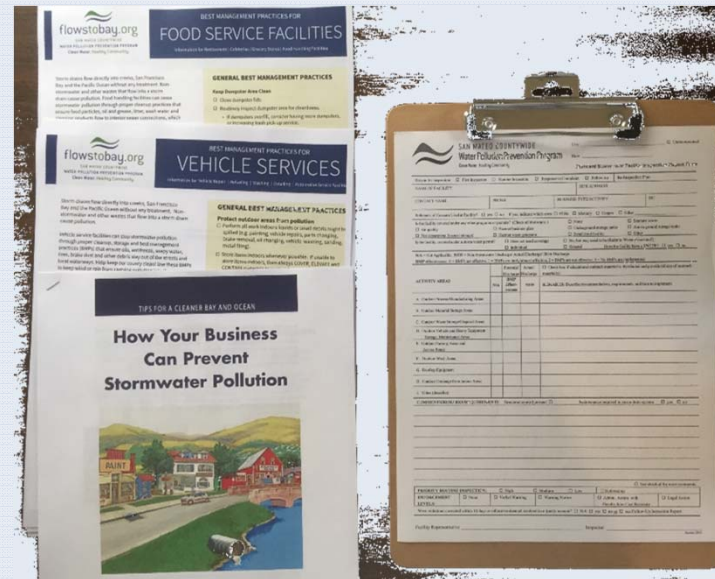
Planning for Inspection

■ File Review

- Past inspection observations
- Past violation

■ Bring

- Phone, camera, flashlight
- Outreach material
- Clipboard & pen
- Inspection forms
- Appropriate PPE
- Credentials



Inspection Process

- **Site Survey – before entering, look for**
 - Nearby conveyance/water bodies
 - Visible discharge points along perimeter
 - Outdoor areas
- **Enter Site**
 - Introduction/present credentials
 - Request to meet with manager, contact on file, ES&H staff
 - If denied entrance leave, contact supervisor and obtain warrant, if needed

Inspection Process

- **Explain reason for inspection**
- **Verify general business information**
 - Contact information
 - Business type/ SIC code
 - Filed NOI for coverage under Industrial Stormwater General Permit (IGP) or may need to
 - SWPPP available – site map may be helpful

Inspection Process



SAN MATEO COUNTYWIDE
Water Pollution Prevention Program
Clean Water. Healthy Community.

City: _____ ☐ Unincorporated

Date: _____

Standard Stormwater Facility Inspection Report Form

Reason for Inspection <input type="checkbox"/> First Inspection <input type="checkbox"/> Routine Inspection <input type="checkbox"/> Response to Complaint <input type="checkbox"/> Follow-up		Re-Inspection Due:	
NAME OF FACILITY		SITE ADDRESS	
CONTACT NAME	PHONE	BUSINESS TYPE/ACTIVITY	SIC
Pollutants of Concern Used at Facility? <input type="checkbox"/> yes <input type="checkbox"/> no If yes, indicate which ones: <input type="checkbox"/> PCBs <input type="checkbox"/> Mercury <input type="checkbox"/> Copper <input type="checkbox"/> Other _____			
Is the facility covered under any other programs or permits? (Check all that apply.)		<input type="checkbox"/> None <input type="checkbox"/> Sanitary sewer	
<input type="checkbox"/> Air quality	<input type="checkbox"/> Hazmat business plan	<input type="checkbox"/> Underground storage tanks	<input type="checkbox"/> Above ground storage tanks
<input type="checkbox"/> Fire department (hazmat storage)	<input type="checkbox"/> Hazmat waste generator	<input type="checkbox"/> Retail food facility	<input type="checkbox"/> Other _____
Is the facility covered under a storm water permit?		Does the facility have a SWPPP? <input type="checkbox"/> yes <input type="checkbox"/> no	
<input type="checkbox"/> Does not need coverage		<input type="checkbox"/> No, but may need to be (Refer to Water Board staff)	
<input type="checkbox"/> Individual		<input type="checkbox"/> General	

Inspection Process

■ **Inspect/ Observe Activities**

- Outdoor areas
- Storm drain system
- Indoor areas that may discharge to outside (roll up doors, etc.)
- Rooftop equipment and/or downspouts

■ **Review with facility contact**

- Record keeping
- Training
- Ask about cleaning practices

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- **Record keeping**
- **Training**
- **Ask about cleaning practices**



Inspection Process

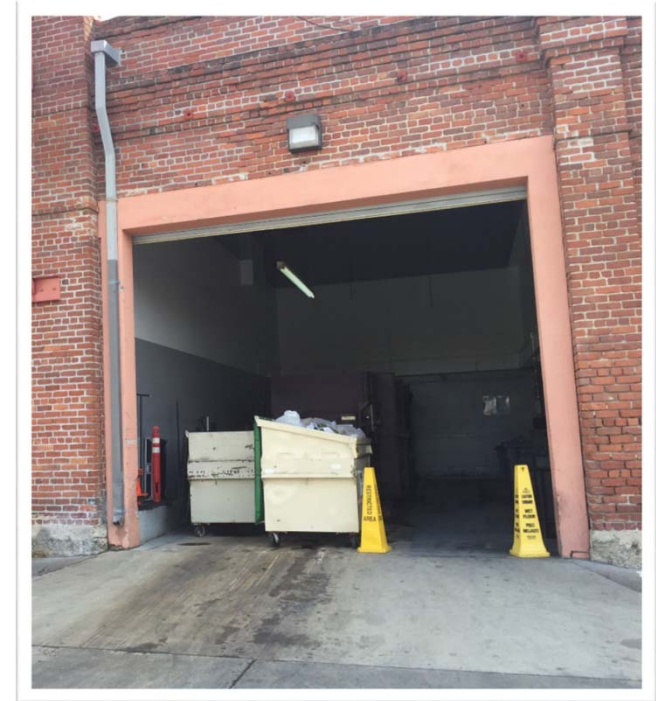
■ Follow the Water

- Site grading
- Inlets, channels, ditches
- Evidence of discharges
 - Stains old or new

■ Outdoor Activities

- Listed on inspection form

■ Note if observed or told by staff



Complete Inspection Form

■ Complete Inspection Form

N/A = Not Applicable; NSW = Non-Stormwater Discharge/ Actual Discharge/ Illicit Discharge

BMP effectiveness: 0 = BMPs are effective, 1 = BMPs are fairly/almost effective, 2 = BMPs are not effective, 3 = No BMPs are implemented

ACTIVITY AREAS		Potential Discharge	Actual Discharge	<input type="checkbox"/> Check box if educational outreach material is distributed and provide title(s) of outreach material(s):
	N/A	BMP Effect- iveness	NSW	REMARKS: Describe recommendations, requirements, and time to implement
A. Outdoor Process/Manufacturing Areas				
B. Outdoor Material Storage Areas				
C. Outdoor Waste Storage/Disposal Areas				
D. Outdoor Vehicle and Heavy Equipment Storage, Maintenance Areas				
E. Outdoor Parking Areas and Access Roads				
F. Outdoor Wash Areas				
G. Rooftop Equipment				
H. Outdoor Drainage from Indoor Areas				
I. Other (describe):				
COMMENTS/REMARKS/REQUIREMENTS Structural control present <input type="checkbox"/> Maintenance required in storm drain system <input type="checkbox"/> yes <input type="checkbox"/> no				

Inspection Form

■ Actual Discharge – note if

- Observed – active discharge must cease immediately
- Evidence of

N/A = Not Applicable; NSW = Non-Stormwater Discharge/ Actual Discharge/ Illicit Discharge
 BMP effectiveness: 0 = BMPs are effective, 1 = BMPs are fairly/most effective, 2 = BMPs are not effective, 3 = No BMPs are implemented

ACTIVITY AREAS	N/A	Potential Discharge	Actual Discharge	<input type="checkbox"/> Check box if educational outreach material is distributed and provide title(s) of outreach material(s):
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Inspection Form

■ Potential Discharge (*BMP Effectiveness*)

→Rate from **0** to **3**

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Inspection Form

■ Process/Manufacturing Areas

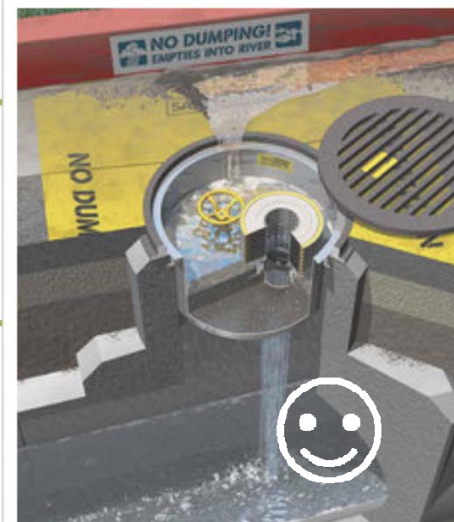
- Good housekeeping
- Sediment control and runoff management
- Eliminate unauthorized stormwater discharge



Inspection Form

■ Materials/Chemical Storage Areas

- Determine materials exposed to rain
- Look for
 - Covered or bermed areas
 - Secondary containment
 - Material stored off the ground
- Protective covers (or other) to protect storm drains
- Evaluate rainwater accumulation potential



Left: The Safe Drain inlet valve

Inspection Form

■ Waste Storage and Disposal Areas

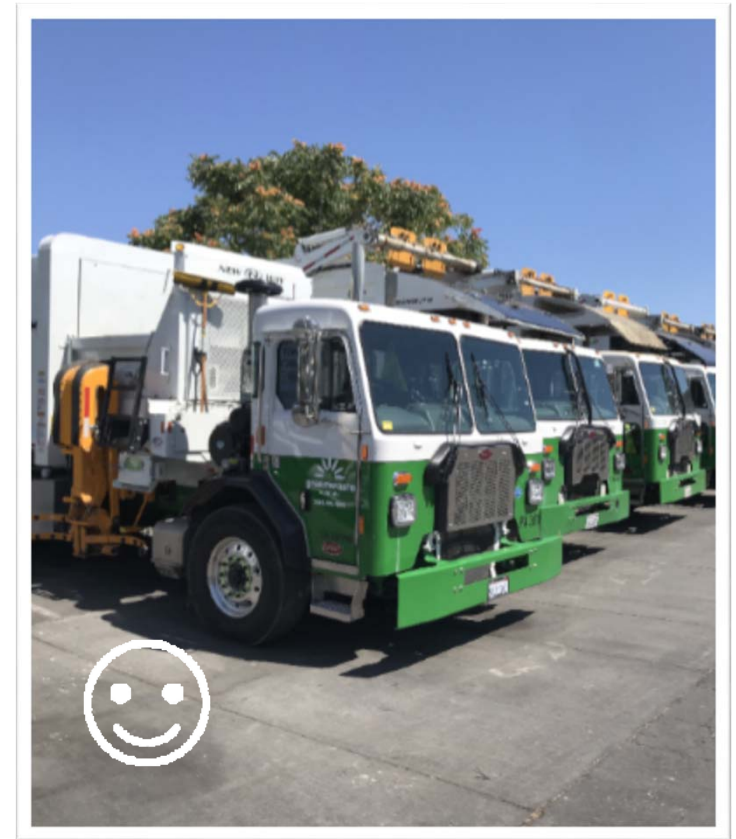
- General cleanliness
- Dumpster lids closed
- Dumpster not leaking
- Tallow bins not leaking/clean
- Types of waste stored (covered, secondary containment)
- Proximity to storm drain



Inspection Form

■ Vehicle/Equipment Storage & Maintenance

- General cleanliness
- Perform maintenance activities indoors
- Keep an eye out for vehicle leaks
- Have a spill kit and drip pans on hand

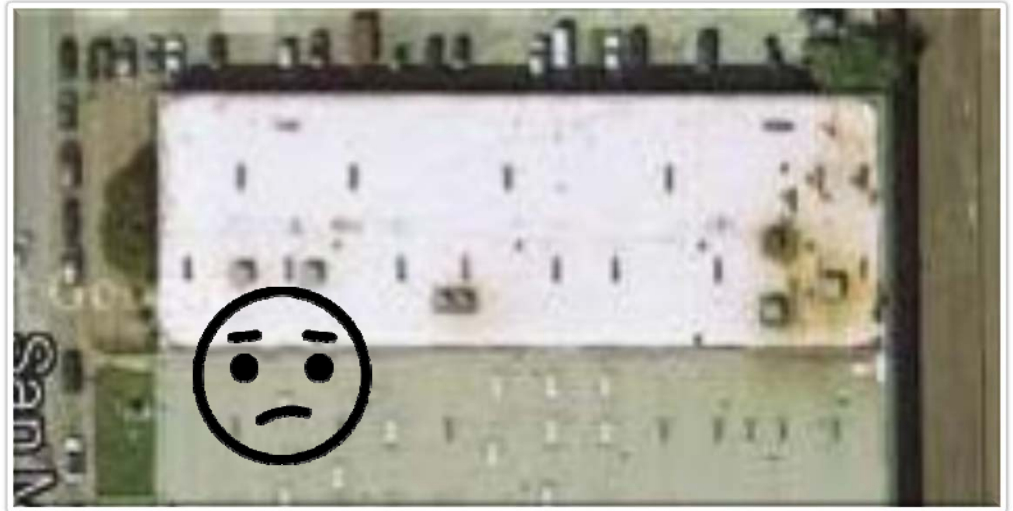


Parking in numbered spots to quickly identify which vehicles need maintenance

Inspection Form

■ Rooftop Equipment

- General cleanliness
- Greasy roof vents
- Catchment pans or trays
- Duct work
- Storm drain protection
- Process residues (e.g. copper deposits)



Inspection Form

■ Outdoor Wash Area

- Impact to storm drain
- Rinse water into sanitary sewer drain
- Recycled in closed loop system
- Contained area



■ Outdoor Drainage from Indoor Areas

- Work bays
- Roll up doors
- Hoses



Inspection Process

■ Enforcement

- Issue enforcement action for
 - actual discharge = non-stormwater discharge (NSW)
 - potential discharge = BMPs ineffective or not implemented (2s and 3s on form)
- Mark enforcement action on inspection form
 - Follow ERP guidance




<input type="checkbox"/> See attached for more comments.					
PRIORITY ROUTINE INSPECTION:		<input type="checkbox"/> High	<input type="checkbox"/> Medium	<input type="checkbox"/> Low	<input type="checkbox"/> Referred to:
ENFORCEMENT LEVELS:	<input type="checkbox"/> None	<input type="checkbox"/> Verbal Warning	<input type="checkbox"/> Warning Notice	<input type="checkbox"/> Admin. Action with Penalty &/or Cost Recovery	<input type="checkbox"/> Legal Action
Were violations corrected within 10 days or otherwise deemed resolved in a timely manner? <input type="checkbox"/> N/A <input type="checkbox"/> yes <input type="checkbox"/> no <u>or</u> <input type="checkbox"/> see Follow-Up Inspection Report					

Facility Representative: _____ Inspector: _____

January 2018

Inspection Process

■ Enforcement

- Provide facility with compliance date
 - Actual discharges cease immediately
 - Correct within 10 business days*
(*or before next rainfall, whichever is first)
 - Or document rationale for longer time period
- Verify corrective actions
 - Follow-up inspection 
 - Have facility email you photos 
 - Have facility email you new procedures or other documentation 

Inspection Process

■ Enforcement Escalation

- Follow Enforcement Response Plan
 - Non-compliance on follow-up inspection
 - Same violation on multiple inspections



Recordkeeping

■ Complete Inspection Form

- Facility Rep signature
- SMCWPPP carbon copy forms
 - Give one copy to the facility
 - Providing form can be process of issuing enforcement action

PRIORITY ROUTINE INSPECTION:		<input type="checkbox"/> High	<input type="checkbox"/> Medium	<input type="checkbox"/> Low	<input type="checkbox"/>
ENFORCEMENT LEVELS:	<input type="checkbox"/> None	<input type="checkbox"/> Verbal Warning	<input type="checkbox"/> Warning Notice	<input type="checkbox"/>	
Were violations corrected within 10 days or otherwise deemed resolved in a timely manner? <input type="checkbox"/> N/A <input type="checkbox"/> yes					

Facility Representative: _____ Inspector: _____

Best Management Practices (BMPs)

Restaurant BMPs

■ Ask

- Where do they wash floor mats
- How do they clean equipment (fume hood, vents, etc.)

■ Dumpsters

- Lids closed
- Not leaking
- Area clean

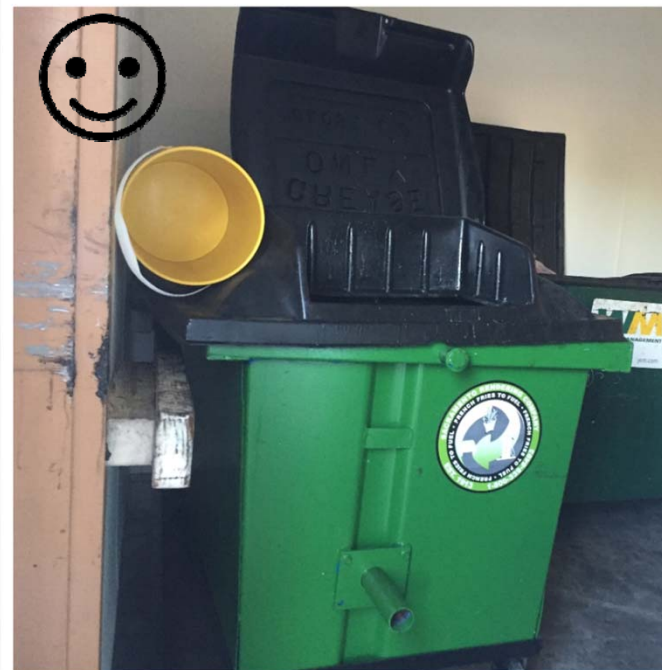


■ No other evidence of NSW discharge

Restaurant BMPs – Cont'd

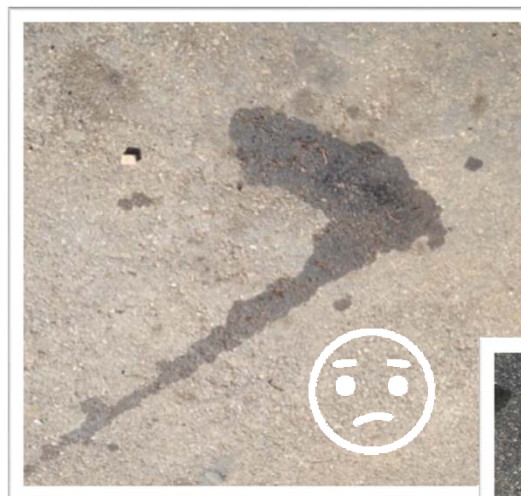
■ Tallow bins

- Outside clean
- No full buckets stored by bin



Vehicle Service Facility BMPs

- **Spill kit**
 - Evidence spills cleaned up
- **Work performed indoors**
- **Vehicle fluids properly managed/stored**
- **No engine parts w/residue stored uncovered/outside**
- **Vehicle wash water directed to sanitary sewer**



Absorbent put on oil stain; be sure to remove absorbent material after the stain has been cleaned.

Vehicle Service Facility BMPs – Cont'd

- Proper storage of vehicle parts
- Dumpsters (closed lids/no leaks/area clean)



General Business BMPs

■ Example BMPs

- Employee awareness
- Good housekeeping
- Spill containment kits in work areas
- Proper storage
- Proper disposal
- No leaks



Contact Information

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