



Facilities CEH Inspects and Common BMPs

Shared inspection practices for CEH
and City inspection staff

CEH Agreement

- CEH conducts Stormwater Inspections for 17 cities
 - Not including South San Francisco, Daly City, San Mateo
- Agreement with the cities to conduct stormwater inspections at commercial/ industrial facilities that CEH already inspects
 - Satisfies the C.4 Section of the permit
 - Currently updating agreement
- CEH conducts inspections as a contractor on behalf of the city
 - CEH Inspectors have access to city ordinances, BIPs, ERPs
 - <http://www.flowstobay.org/inspectorresources>
 - **Every Permittee is responsible for establishing a BIP/ERP**

Types of Facilities CEH Inspects

- Restaurants
- Retail stores (Safeway, Rite Aid, 7-11, Dollar Tree,...)
- Facilities storing Hazardous Materials/Hazardous Waste
 - Auto repair shops
 - Dry cleaners
 - Industrial facilities
 - Biotech labs
 - R & D Labs
 - Farms

CEH Frequency of inspection

- Routinely every two years
- High priority sites annually
 - NOI facilities (typically haz mat facilities)
 - ASBS (Upstream of Fitzgerald Marine Preserve)
 - Escalated enforcement facilities
 - Repeat violations
 - Violations not resolved in a timely manner
- Shared property sites every five years (strip malls)
 - Alternating inspections cycle
 - Can still cite any facility in the group, but inspection anniversary is reduced

CEH Role and Responsibility

- Maintain facility list
 - Cities cross-check county list with building and planning departments, fire, and city licenses
- Conduct Stormwater Inspection
 - Electronic Report 
- Manage required inspection data
- Inform cities of compliance issues with businesses
 - Enforcement escalated past Level 2
- Periodically provide cities electronic inspection data table
- Annually provide cities complete facility list and facilities scheduled for inspection in next FY

City Role and Responsibilities

- Share BIP & ERP with CEH
- Inspect all potential discharge facilities not covered by the CEH agreement
- Periodically conduct review of businesses in jurisdiction
 - Compare to CEH list
 - Provide CEH with missing facilities they inspect
 - City inspects facilities required by MRP that do not fall under CEH facility types
 - **CEH agreement does not cover all facilities**
- Periodically review inspection results
- Manage electronic inspection data tables
- Follow-up on compliance issues identified by CEH

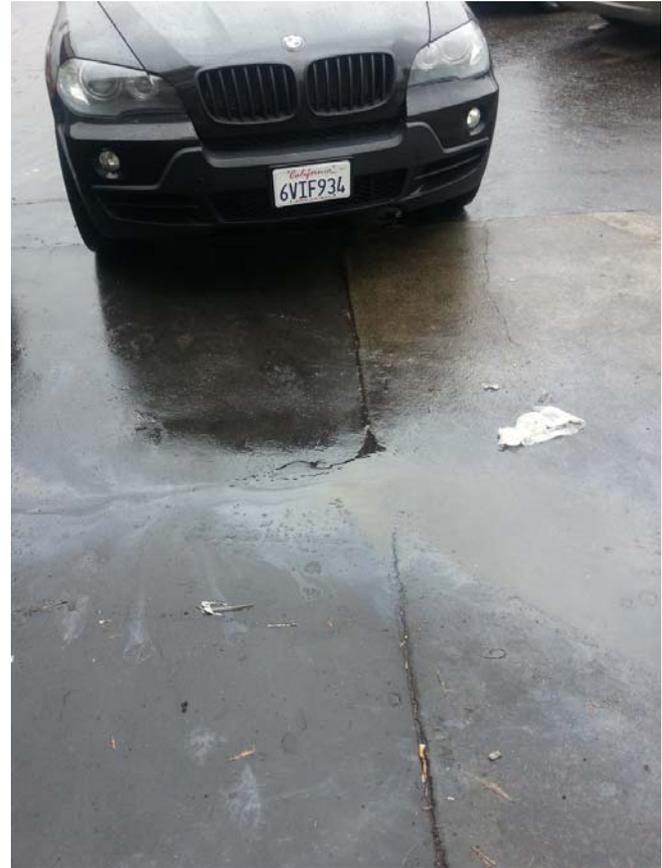
What Inspectors Look For: Outdoor Process/Manufacturing

- Activity near storm drains
 - Ability for pollutant or non-stormwater discharge to reach drain
 - Example: Terminate wet sanding discharge to the storm drain
 - Storm drain inlets labeled "Drains to Creek (or Bay)"
- Regular inspections by management for potential pollutant exposure
- Good housekeeping
- Equipment in good repair
- Drip pans installed under potential leak points
- Equipment blow down and condensate directed to the sanitary sewer

Good BMPs



Poor BMPs



Poor BMPs



What Inspectors Look For: Outdoor Material Storage

- Materials covered/protected from the rain
 - Under roof
 - Inside enclosures
 - Under weighted or secured tarps
- Stored off the ground, or in bermed area to prevent stormwater run on
- Stored in appropriate containers
- Liquids and hazardous materials in secondary containment
- No drain in secondary containment (or drain is closed)

Good BMPs



Poor BMPs



What Inspectors Look For: Outdoor Waste Storage

- Lids closed on trash dumpsters
- No leakage from dumpsters
- Housekeeping issues
 - No staining around fat/oil/grease containers
 - Spills on and around containers are cleaned up
- Secondary Containment
- Hazardous wastes properly labeled
- Covered waste containers
 - Under roof
 - In labeled enclosures

Good BMPs



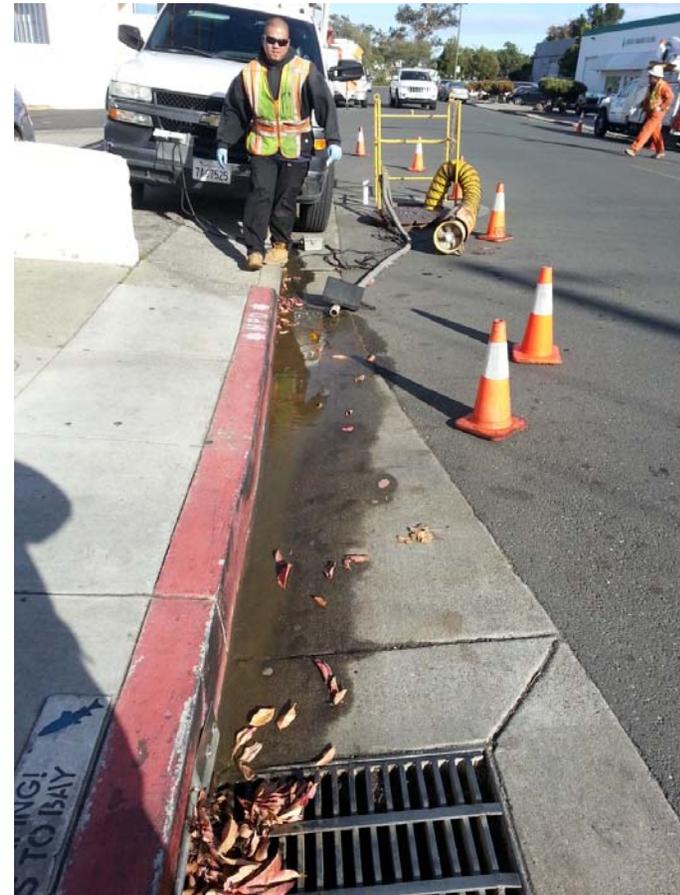
Poor BMPs



What Inspectors Look For:

- Outdoor Parking Areas, Vehicle Storage and Maintenance
 - Regular inspections to clean-up fluids spills/leaks and
 - Disposal of adsorbent and powerwash waters properly
- Rooftop Equipment
 - Discharges to sanitary system, oily discharges adsorbed and disposed properly
 - Best practice to inspect regularly, oily discharges inspected weekly
- Outdoor drainage from indoor area
 - Evidence of stains or spills
 - Liquid storage close to doorways in secondary containment

Poor BMPs



Poor BMPs



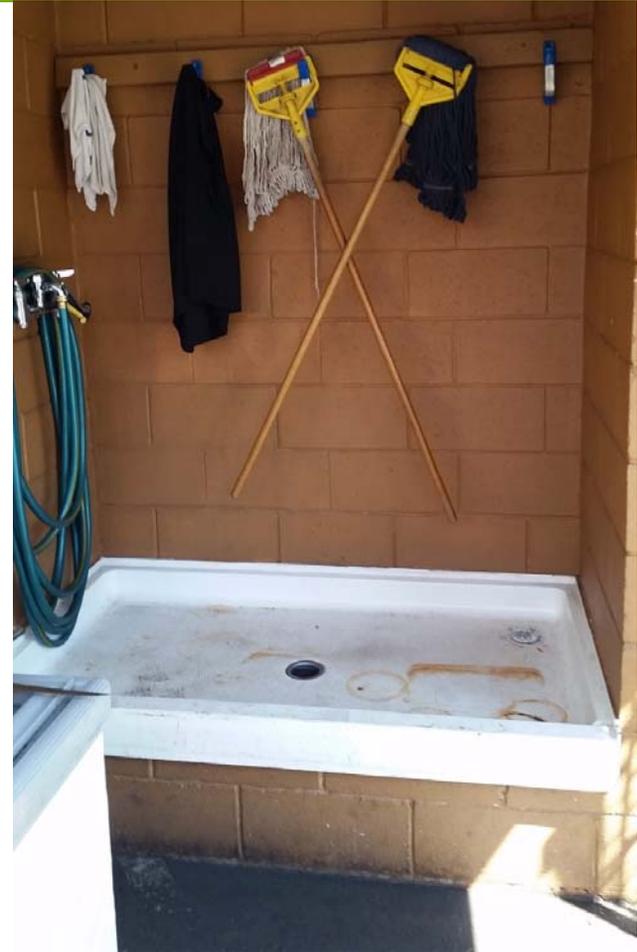
What Inspectors Look For Outdoor Wash Areas and Other Potable Water Discharges

- Floor mat washing
 - Wash at utility sink or in industrial high temperature dishwasher or “do-it-yourself” car washing facility is acceptable
 - Mat exchange with a cleaning vendor (Cintas, Aramarc, etc.)
- Tool Cleaning
 - Dry wipe as much as possible
 - If water needed, wash water directed to a sanitary drain

What Inspectors Look For Outdoor Wash Areas and Other Potable Water Discharges

- Sidewalk washing
 - Dry sweep
 - Powerwash with ability to capture and pump or vacuum up wash water
 - Water directed to landscaping with water conserving nozzle and no overflow
 - Evidence of corrosion from soaps and surfactants
- Potable water runoff
 - Water conservation applied
 - Directed to landscape with no overflow
 - Recycle or reuse employed

Good BMPs



Good BMPs



What CEH Inspectors Look For Restaurants

- Spills cleaned up immediately outside and inside
- Dumpster area clean of trash and liquids, lids closed
- Equipment washed indoors and wash water discharged to sanitary sewer
- Waste oil and grease management
 - No grease stains from waste containers
 - Licensed hauler or recycler
- Refrigeration and cooling equipment discharges go to sanitary sewer
- Rooftop exhaust fans clean of oil, or with oil collection trays emptied weekly

What CEH Inspectors Look For Auto Service Facilities

- Surfaces kept clean of spills outside and inside
- Drip pans under leaky vehicles
- Spill kits with adsorbent and practice of proper disposal
- Covered outdoor storage, e.g. parts, vehicle fluids, batteries, tires
- Primary containers in secondary containment
- Work performed indoors for any activity which:
 - Generates small particles like metal filings, wet sanding grit, brake dust, paint chips, etc.
 - Might spill liquids such as oil changing, radiator work or parts cleaning
- All vehicle wash water reaches the sanitary sewer