

# Reissued MRP: How is it Different and How is it the Same

*Industrial/Commercial Inspection Workshop*

**June 2016**

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**EOA, Inc.**

# Outline of Presentation

- Regulatory Background
- **New** Municipal Regional Permit
- State Industrial General Permit
- Resources

# Terms

- **MRP:** San Francisco Bay Municipal Regional Stormwater Permit
- **NPDES:** National Pollutant Discharge Elimination System
- **Receiving Water:** Waters of the U.S. or creeks, rivers, lakes or bays
- **MS4s:** Municipal Separate Storm Sewer Systems
- **RWB:** Regional Water Board
- **NOI:** Notice of Intent

# Terms

- **BMPs:** Best Management Practices

CASQA Definition: Includes schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent, eliminate, or reduce the pollution of waters of the receiving waters. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

# Stormwater Regulations



U.S. EPA

Clean Water Act establishes  
NPDES permit program



State Water Resource Control Board

NPDES Permitting authority in CA  
Issues State Industrial General Permit



Regional Water Quality Control Board  
9 regions

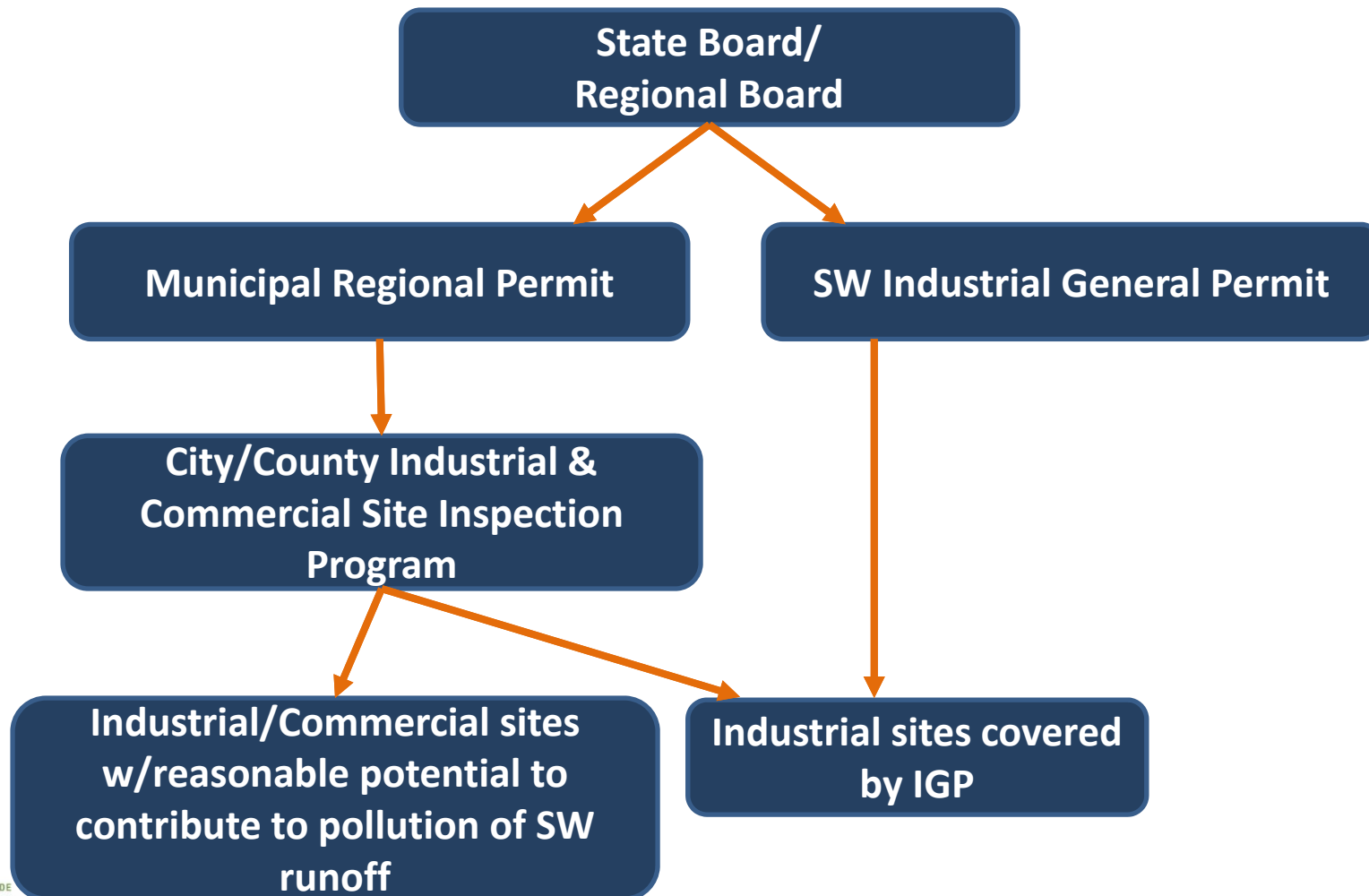
Issues MRP to Phase I MS4s  
Inspects/Enforces State Industrial General Permit



Municipal Separate Storm Sewer System  
(MS4)

Implement Stormwater Program

# Industrial Site Regulations



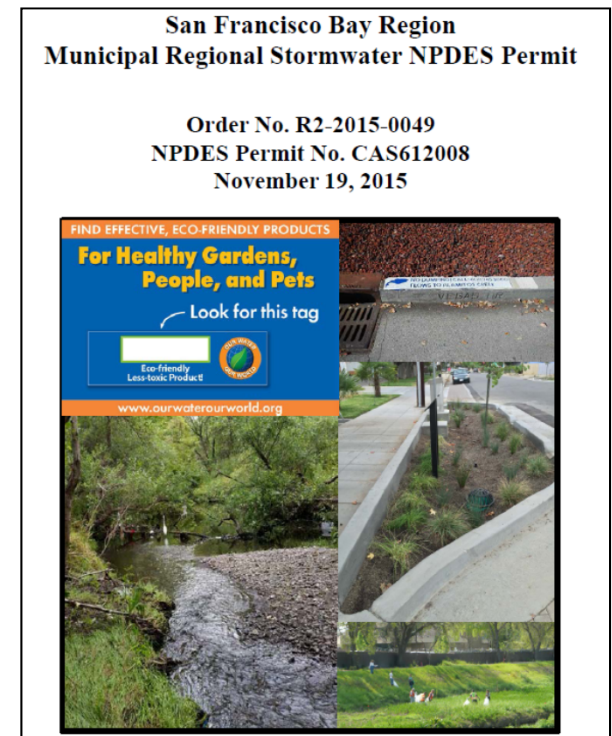
# Municipal Regional Permit (MRP)

- Regional permit regulating municipal stormwater systems
- Applies to 76 cities, counties, and districts in:
  - Santa Clara, Alameda, Contra Costa, and San Mateo Counties
  - Fairfield and Suisun City (Solano County)
  - Vallejo (Solano County)



# Municipal Regional Permit (MRP)

- First adopted by Regional Water Board: October 14, 2009
- Permit renewed every 5 years
- Reissued November 19, 2015
- Became effective January 1, 2016





# Municipal Regional Permit (MRP)

- **MRP Provisions**

- C.4 Industrial and Commercial Site Controls
- C.5 Illicit Discharge Detection and Elimination
- C.13 Copper Controls

- **Minor changes in reissued MRP**

- **Prevent discharges of pollutants and impacts on receiving waters**

# Business Inspection Program Requirements

- **Legal authority – no change**
- **Business Inspection Plans – small changes**
  - Identify facilities for inspection
    - Activities
    - Types of businesses
    - Industrial facilities subject to State IGP
  - Prioritize inspections
  - Identify new businesses
  - **List of facilities scheduled for inspection each FY**

# Enforcement Response Plan

- **Permittees should review ERPs and confirm meet new detailed description of contents**
- **Description of procedures/guidance for**
  - Appropriate enforcement actions
  - Follow up inspections
  - Referrals to another agency
  - Time period for implementing corrective actions
  - Roles and responsibilities of staff

# Enforcement Response Plan

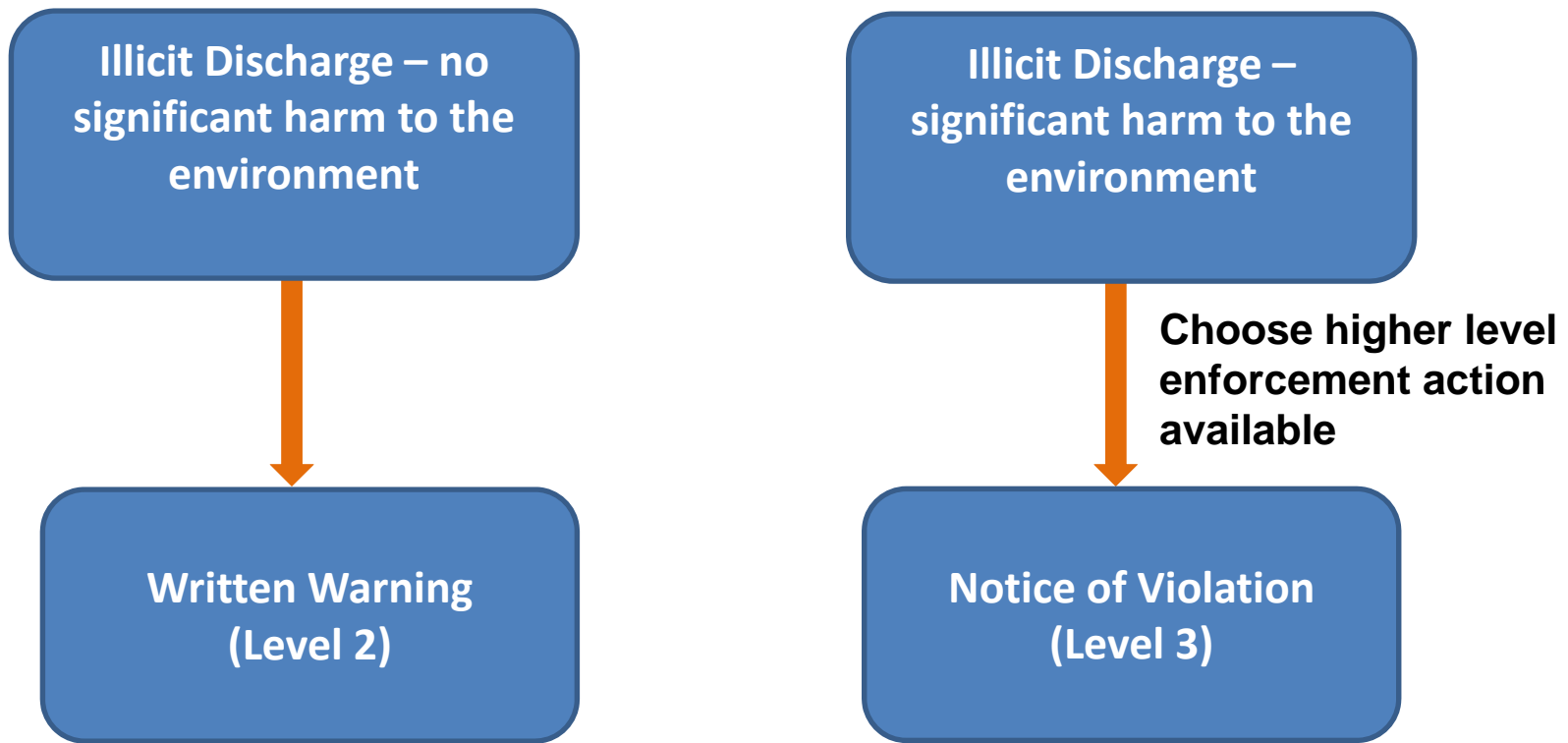
- **Discuss escalating enforcement tools for different field scenarios**
  - Potential discharges
  - Actual discharges
  - Non-compliance with previous enforcement actions
  - Sites with history of potential/actual discharges
- **(NEW) No longer use “violations” refers to actual and potential discharges**

# Enforcement Response Plan

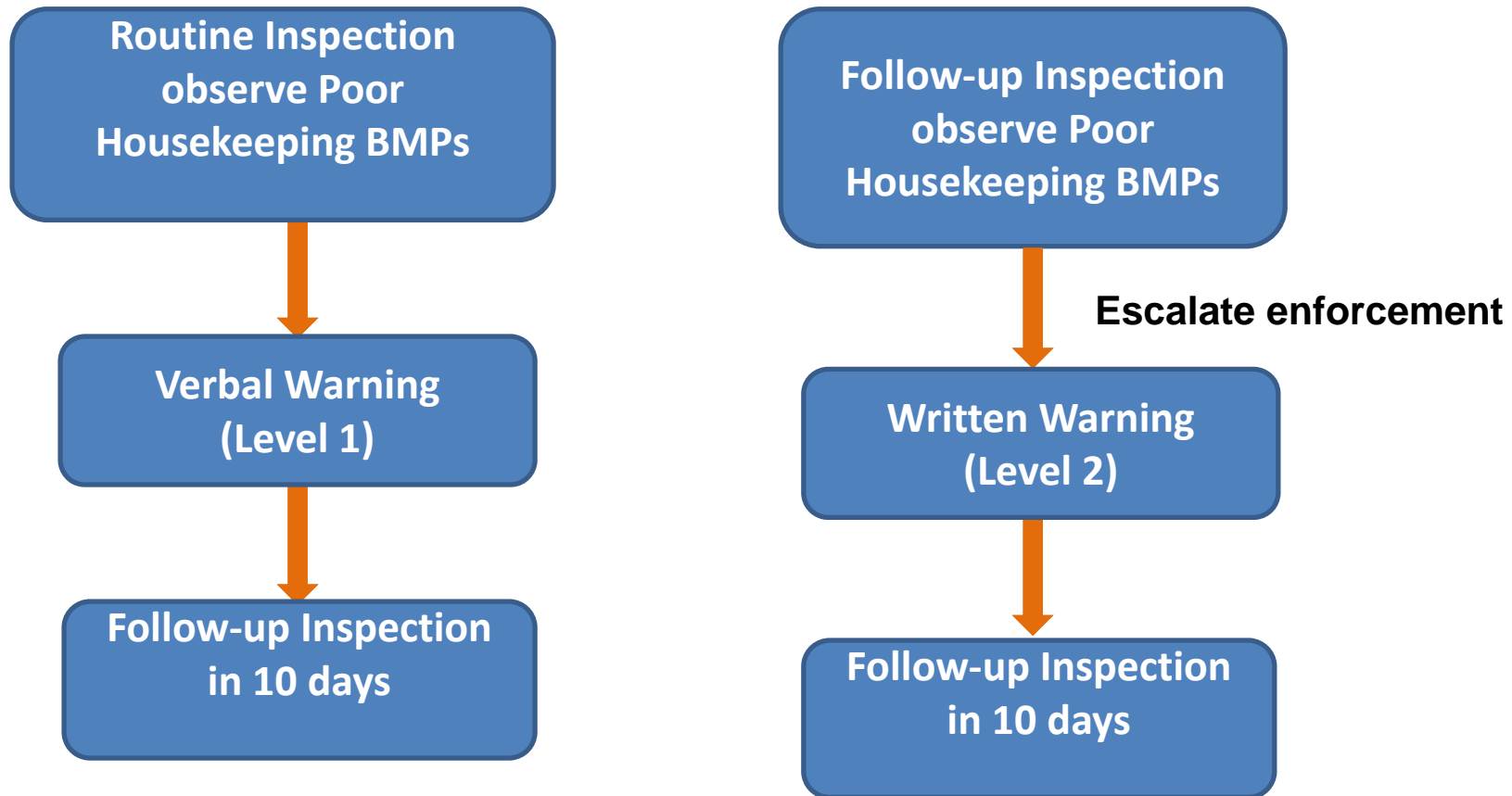
## ■ Timely Correction

- Actual non-stormwater discharges cease immediately  
(NEW)
  - Industrial General Permit authorized non-stormwater discharges conditionally allowed
- Corrective actions implemented
  - Within 10 business days,
  - Or before next rain event,
  - OR record rationale for longer compliance.
- Referral to Regional Water Board

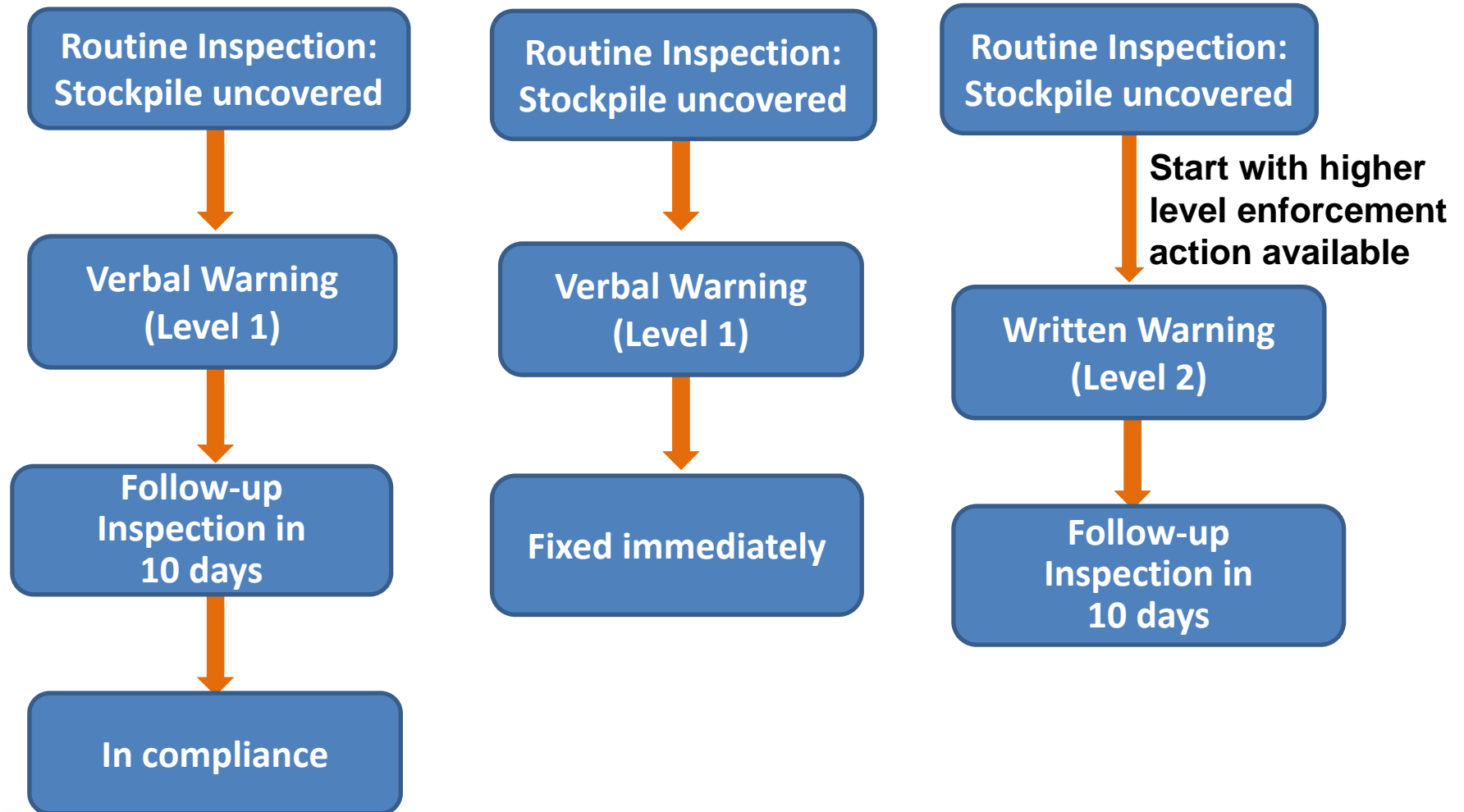
# Example of Progressive Enforcement



# Example of Progressive Enforcement



# Example of Progressive Enforcement





# Recordkeeping

- **Electronic database or table**
  - Facility
  - Inspection date
  - **Industrial General Permit coverage required**
  - Compliance status
  - Type of enforcement
  - Type of activity or pollutant source
  - Specific problems
  - Problem resolution **date**
  - Comments
- **Annual Report – summary numbers match tabular data**

# Staff Training

- **Provide training in following topics**
  - Urban runoff pollution prevention
  - Inspection procedures
  - **Business Inspection Plan (New)**
  - **Enforcement Response Plan (New)**
  - Illicit Discharge Detection and Elimination
  - Appropriate BMPs for different facilities

# IDDE Program

- Legal Authority – no changes
- ERP – same as C.4
- Spill/Complaint Inspection
  - Minor change to electronic database/table data tracking
    - Date and time abated
    - Removed response times
  - Recommend including method for identifying Mobile Business
    - New reporting requirements

# IDDE Program

- **Control of Mobile Business**
  - Standard BMPs
  - Enforcement strategy
    - Enforce under IDDE Program
    - Share enforcement on SMCWPPP members only webpage
  - Inventory
    - Regularly update inventory
  - Outreach
  - Report enforcement and inspections - new

## Three Steps to Remember Before You Clean

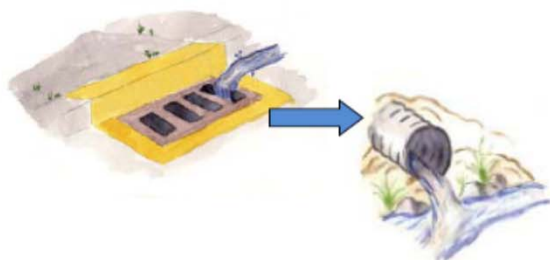
1. **Be a BASMAA Recognized Mobile Cleaner**  
Take the online "mobile surface cleaning" training from BASMAA (Bay Area Stormwater Management Agencies Association). This program will train you on how to clean different surfaces in an environmentally acceptable way and publish your name as a trained cleaner. Visit [www.basmaa.org](http://www.basmaa.org).
2. **Ask Your Local Inspector**  
Contact your local City stormwater inspector to determine specific discharge requirements. Obtain permission to discharge to the property owner's sanitary sewer plumbing or landscaping before starting the job.
3. **Divert and Collect Wash Water**  
Cover the storm drains to prevent wash water from entering and divert wash water to the sanitary sewer system if permitted to do so. Small amounts may be diverted to landscaped areas, if appropriate.

## Local Pollution Control Agencies

Burlingame Waste Water Treatment Facility .....	(650) 342-3727
Millbrae Water Pollution Control Plant.....	(650) 259-2388
North San Mateo County Sanitation District Wastewater Treatment Plant .....	(650) 991-8200
Pacific's Calera Creek Water Recycling Plant .....	(650) 738-4660
San Mateo Waste Water Treatment Plant.....	(650) 522-7300
Sewer Authority Mid Coastside Wastewater Treatment Facility .....	(650) 726-0124
Silicon Valley Clean Water .....	(650) 594-8411 ext. 140
South San Francisco/San Bruno Water Quality Control Plant .....	(650) 877-8555
Palo Alto Regional Water Quality Control Plant .....	(650) 329-2598
San Francisco's Southeast Treatment Plant .....	(415) 648-6882
West Bay Sanitary District .....	(650) 321-0384

## Protect the Bay, the Ocean, and Yourself!

When wash water flows into storm drains it goes straight to local creeks and the Bay or Ocean without any cleaning or filtering.



If you discharge wash water generated by mobile cleaning activities to the storm drain, **you are violating municipal stormwater ordinances and may be subject to a fine.**

For More Information About Stormwater Pollution Prevention

*Insert Contact Information and logo*



The San Mateo Countywide Water Pollution Prevention Program acknowledges the Santa Clara Valley Urban Runoff Pollution Prevention Program for developing and sharing the content and artwork of this brochure.

March 2015

*Best Management Practices for*

# MOBILE BUSINESSES

Carpet Cleaners  
Vehicle Washers or Detailers  
Power Washers  
Pet Care Services  
Steam Cleaners



Information about using Best Management Practices (BMPs) to prevent wash and rinse waters from entering storm drain systems and polluting local waterways, our Bay, and our Ocean.



## Why should we be concerned with wash water disposal?

Wash water from mobile cleaning is NOT just dirt and water. It also may contain soaps, toxic chemicals, heavy metals, oil, and/or grease that are harmful to our creeks and waterways.

Pollutants draining from mobile cleaning activities are washed into the street and into the storm drain system which then flows to our creeks, Bay, and Ocean without any cleaning or filtering.

Federal, State, and local regulations **prohibit discharge of anything but rain water in the storm drain.**

Implementing the proper Best Management Practices (BMPs) is easy and is required for compliance with stormwater pollution prevention regulations.



## What about biodegradable and non-toxic cleaning products?

Cleaning products labeled “non-toxic” and “biodegradable” can still harm wildlife if they enter a storm drain system. Fish, for example, are affected by both regular and biodegradable soap! However, if disposed of in the sanitary sewer system, wastewater treatment plants prefer biodegradable products over toxic cleaners.



## Plan Ahead

- ❑ Determine where you will discharge wastewater before starting a new job.
- ❑ Be sure to have equipment on hand (i.e. long hoses, sump pump, etc.) for directing discharge to sanitary sewer access points. Ensure hoses are long enough to reach access points that are far from your holding tank.



*Contact your local hardware or construction material stores for available tools and materials for mobile businesses including wet/dry vacuums and sump pumps, mats, sand or gravel bags, wattles, etc.*

## Options for Disposal

**Never** drain wash or rinse water into streets, gutters, parking lots, or storm drains.

- ❑ Wash and rinse waters can usually be discharged to the sanitary sewer through a drain at the property owner's home or business, such as a utility sink, floor drain, mop sink, cleanout or toilet. Take precautions to prevent debris, hazardous materials or anything that can clog from entering sinks, toilets or sanitary drains.
- ❑ Direct water to landscaping or gravel surfaces. Wash water must completely soak into vegetation before you leave the site.

## Doing the Job Right Checklist of BMPs

- ❑ Walk the area to identify storm drains.
- ❑ Sweep the wash area to remove debris.
- ❑ If feasible, wash on a vegetated or gravel surface where wash water can infiltrate into the ground without runoff.
- ❑ Contain wash area so that water does not drain down streets and gutters— use sand bags, plugs, containment mats or berms.
- ❑ Block or seal off any storm drain inlets and sloping areas that release water to the gutter to prevent wash water from entering the storm drain.
- ❑ Put storm drain protection in place before starting the washing process and remove before you leave the site.
- ❑ Vacuum or shake floor mats into a trash can.
- ❑ Minimize water use; use nozzles on hoses.
- ❑ Use less-toxic cleaning products (or wash without soaps and solvents, if possible)
- ❑ Use a “wet-vac” to vacuum up the contained wash water for proper disposal.
- ❑ Remove all debris or sediment accumulated during washing activities and put in the trash, or if it is hazardous, dispose of it properly.



# Source Control: Copper (Provision C.13)

- **Discharges from Pools, Spas, and Fountains that Contain Copper Based Chemicals**
  - Prohibit discharges
  - Report annually on enforcement activities - new
- **Industrial Sources**
  - Identify facilities likely to have sources of copper
  - Educate industrial facilities on proper BMPs
  - Ensure proper BMPs to minimize discharge of copper, including roof runoff

# Statewide Industrial Activities SW General Permit (IGP)

- **Permit reissued by State Board April 2014**
- **Implementation date: July 1, 2015**
- **Every facility must submit NOI**
- **Compliance inspections & enforcement by Regional Water Board staff**



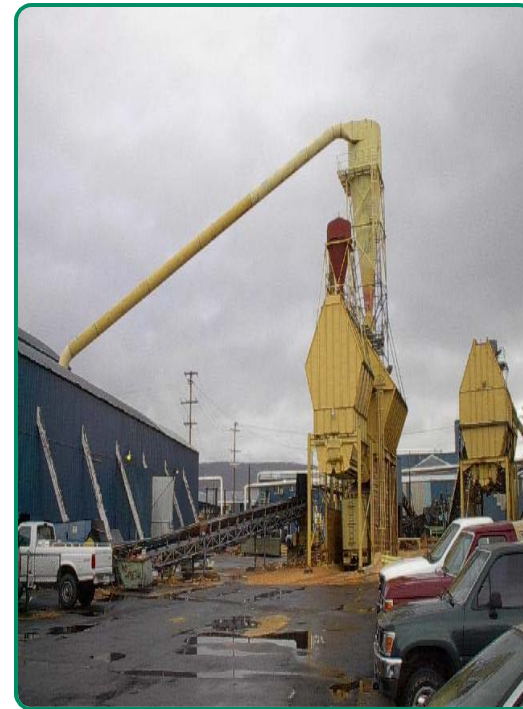
# Industrial General Permit

- **Applies to Industrial Facilities Listed in Appendix A of the Permit (by SIC code):**
  - 40 CFR Subchapter N
  - Manufacturing Facilities
  - Oil & Gas/Mining Facilities
  - Hazardous Waste Treatment, Storage or Disposal Facilities
  - Landfills, Land Application Sites and Open Dumps
  - Recycling Facilities
  - Steam Electric Power Generating Facilities
  - Transportation Facilities
  - Sewage/Wastewater Treatment Works



# Industrial General Permit

- **Contains requirements for**
  - Stormwater Pollution Prevention Plan (SWPPP)
  - Minimum BMPs
  - Monthly self inspections
  - Sampling
  - Reporting
  - Meet Action Levels



# Exceedance Response Actions (ERAs)

- **Numeric Actions Levels (NALs)**
  - Annual Average NALs
    - TSS, O&G, site specific parameters
  - Instantaneous Maximum NALs
    - TSS, O&G, pH
- **Discharger Status Levels**
  - Baseline Status
  - Level 1 Status
  - Level 2 Status
- **ERA evaluation & action plans by QISP**

# QISP

- **Qualified Industrial Stormwater Practitioner**
  - Complete State Board approved training
  - Register on SMARTS
  - Required for Level 1 and 2 status work
  - Required for Compliance Group Leader



## QUALIFIED INDUSTRIAL STORMWATER PRACTITIONER FACT SHEET



The California Stormwater Industrial General Permit (IGP) glossary defines a Qualified Industrial Stormwater Practitioner (QISP) as:

*"Only required once a Discharger reaches Level 1 status, a QISP is the individual assigned to ensure compliance with this General Permit or to assist New Dischargers with determining coverage eligibility for discharges to an impaired water body. A QISP's responsibilities include implementing the SWPPP, performing the Annual Comprehensive Facility Compliance*

# SMARTS

## Stormwater Multiple Application Reporting and Tracking System

- Permit Registration Documents
  - NOI
  - Site Map
  - SWPPP
  - NEC
- Annual Reports
- Level 1 and 2 ERA Reports

### SMARTS LOGIN

[Web Browser Requirements](#)

User ID:

Password:

Login

New User, Start here:

Sign Up [Help](#)

Industrial Permit Recertification

[Click here](#)

Forgot User ID or Password?

[Click here](#)

Public Access to NOI, SWPPPs &  
Annual Reports data

View SW Data

# Why do you need to know about IGP?

- **MRP requires SW Inspectors to:**
  - Evaluate if coverage is needed under the General Permit
  - Track if NOI was filed
  - Refer non-filers to RWB staff
  - Include NOI facilities in Business Inspection Plan





# Why do you need to know about IGP?

- **IGP tools may help inform MRP inspections**
  - Looking at SWPPP, maps, inspection records, sampling results, etc.
  - Speaking with QISP
- **Overall site compliance reflects on your inspection program**
  - You inspect for compliance with local SW ordinance
  - Regional Board staff inspects for compliance with IGP



# NOI Facilities

- **MRP: Include NOI facilities in your Business Inspection Plan**
  - that have reasonable likelihood to be sources of pollutants to SW and non-SW discharges
- **Find facilities in your city on State Board website**

*Water Boards Storm Water Multiple Application & Report Tracking System 2*

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**Storm Water Regional Board Data File Download**

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Regional Board: Region 2 - San Francisco Bay ▼

Select Region and download a tab delimited text file

Download Data File

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# NOI Facilities

- **MRP: Evaluate if industrial facility needs coverage under State General Permit**
- **Previous Permit “Category 10”**
  - Manufacturing facilities where industrial materials, equipment, or activities are exposed to storm water
  - SIC codes 20, 21, 22, 23, 2434, 25, 265, 267, 27, 283, 285, 30, 31 (except 311), 323, 34 (except 3441), 35, 36, 37 (except 373), 38, 39 and 4221-4225
- **New Permit combines Category 2 & 10**
  - SIC codes 20XX - 39XX, and 4221-4225

# NOI Facilities

- **All facilities must file NOI**
  - Previously Category 10 facilities did not have to file if no exposure
- **NOI package can include**
  - No Exposure Certification (NEC)
  - Notice of Non-Applicability (NONA) = No Discharge

# NOI Facilities

- **MRP: List non-filers in Annual Report**
  - May need to educate some facilities that were previously Category 10 and did not have to file NOI

NEC brochure  
available on State  
Board website  
in English and  
Spanish



Does your facility qualify  
for the No Exposure  
Certification?



## Obtaining NEC Coverage

A Discharger must electronically certify and submit NEC Permit Registration Documents (PRDs) via State Water Resources Control Board's (State Water Board's) Storm Water Multi-Application and Report Tracking System (SMARTS) to obtain NEC coverage. This conditional exclusion does not become effective until the PRDs are submitted and the annual



## What is the No Exposure Certification?

A discharger is conditionally excluded from specific permit requirements if the Discharger can certify that a condition of "No Exposure" exists at the industrial facility.

A condition of "No Exposure" means that a Discharger's industrial activities and materials are not exposed to storm water. Industrial storm water discharges from construction and land disturbance activities are ineligible for the NEC coverage.

**State Water  
Resources  
Control Board**

# Types of NOI Facilities

SIC Code		Alameda	Contra Costa	San Mateo	Santa Clara	Total
01-09	Agriculture, Forestry & Fishing			1		1
10-14	Mining	11	6	9	10	36
15-17	Construction	2			1	3
20-39	Manufacturing	431	103	84	470	1,088
40-49	Transportation, Communications, Electric, Gas & Sanitary Services	263	98	54	157	572
50-51	Wholesale Trade	110	44	15	98	267
52-59	Retail Trade	2				2
60-89	Services	7			4	11
91-99	Public Administration	20	3	2	11	36
	Not Provided				1	1
	<b>TOTAL</b>	<b>846</b>	<b>254</b>	<b>165</b>	<b>752</b>	<b>2,017</b>

# Types of NOI Facilities

SIC Code	Category	San Mateo County		
		NOI	No Exposure Certification	Total
01-09	Agriculture, Forestry & Fishing	1		1
10-14	Mining	9		9
20-39	Manufacturing	66	18	84
40-49	Transportation, Communications, Electric, Gas & Sanitary Services	52	2	54
50-51	Wholesale Trade	15		15
91-99	Public Administration	1	1	2
Total		144	21	165

# Types of NOI Facilities

City	01-09	10-14	20-39	40-49	50-51	91-99	Total
Belmont			3	1	1		5
Brisbane		2	2	7			11
Burlingame			1	3			4
Colma			1	2			3
Daly City				4			4
East Palo Alto				1	3		4
Foster City			2				2
Half Moon Bay	1	2	4	2			9
Menlo Park			14	4		1	19
Millbrae				1			1
Pacifica					1		1
Portola Valley			1				1
Redwood City		3	23	3	4	1	34
San Bruno				1			1
San Carlos			15	5	2		22
San Francisco			2	2			4
San Mateo				5	1		6
South San Francisco		1	12	13	3		29
Woodside		1	3				4
<b>Total</b>	<b>1</b>	<b>9</b>	<b>84</b>	<b>54</b>	<b>15</b>	<b>2</b>	<b>165</b>

# Types of Manufacturing Facilities

SIC Codes		San Mateo
20xx	Food and Kindred Products	15
26xx	Paper and Allied Products	2
28xx	Chemicals and Allied Products	12
29xx	Petroleum Refining and Related Industries	6
30xx	Rubber and Miscellaneous Plastic Products	7
32xx	Stone, Clay, Glass, and Concrete Products	13
33xx	Primary Metal Industries	4
34xx	Fabricated Metal Products, Except Machinery & Transport Equipment	7
35xx	Industrial and Commercial Machinery and Computer Equipment	4
36xx	Electronic, Electrical Equipment & Componentes, Except Computer Equipment	5
38xx	Mesr/Anlyz/Cntrl Instruments; Photo/Med/Opt Gds; Watchs/Clocks	9
39xx	Miscellaneous Manufacturing Industries	1
Total		85

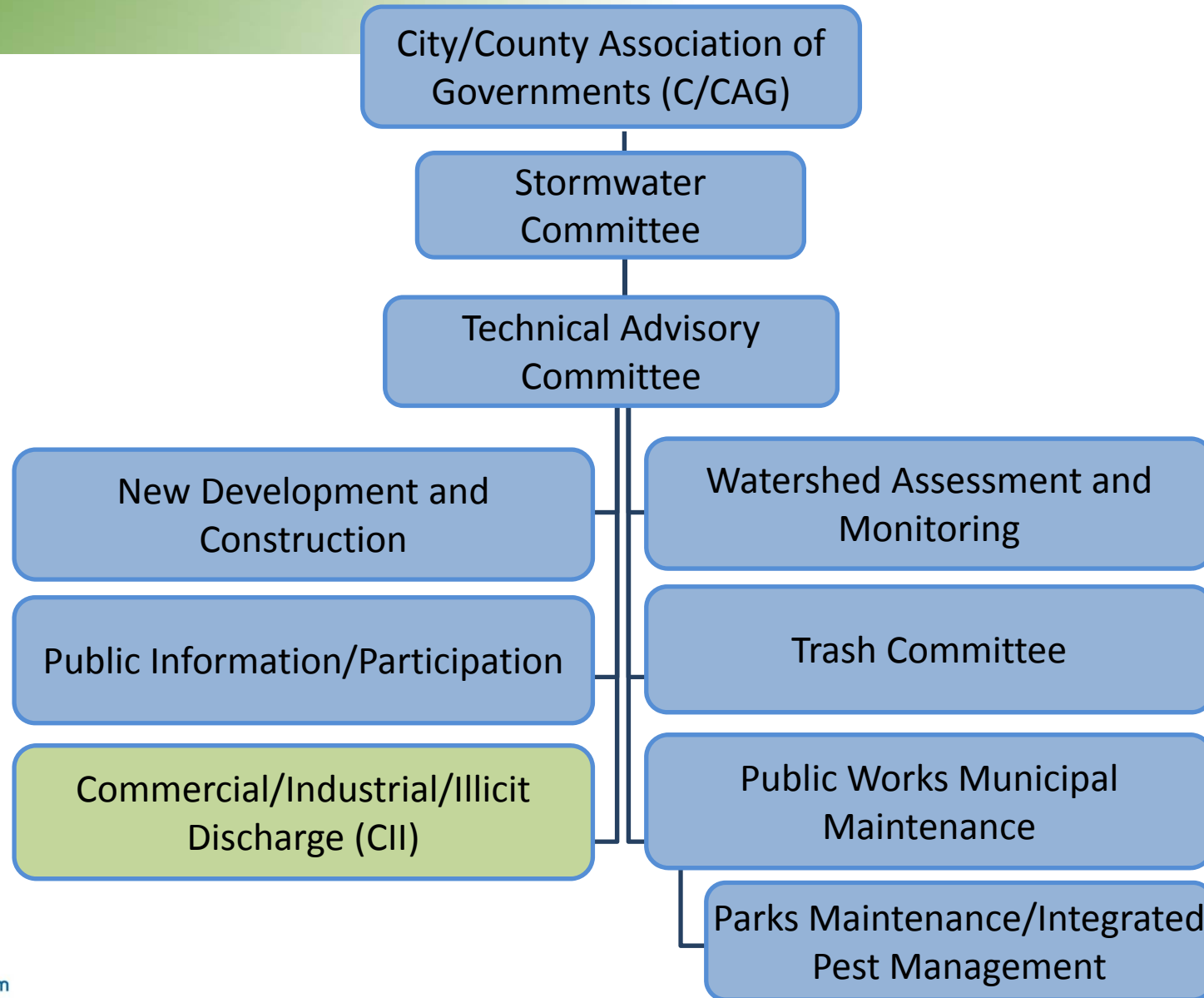
# Resources

## ■ SMCWPPP

- San Mateo Countywide Water Pollution Prevention Program
- Program of City/County Association of Governments of San Mateo County (C/CAG)
- 20 Cities/Towns plus County and Flood Control District
- Assist Municipalities with Countywide Stormwater Permit Compliance Activities
- Matt Fabry, Program Coordinator
- Website – [www.flowstobay.org](http://www.flowstobay.org)



# San Mateo Countywide Water Pollution Prevention Program Organizational Structure



# Resources....

## ■ **SMCWPPP Website**

- Tips for a Cleaner Bay: How Your Business Can Prevent Stormwater Pollution
- Stormwater Pollution Prevention Guidelines for Food Handling Facilities
- Vehicle Service Facilities Best Management Practices
- Members Only CII Webpage: How to Conduct Stormwater Inspections

## ■ **Agency specific outreach**

# Resources...

- **CASQA Industrial and Commercial BMP Handbook Portal**
  - available on web by subscription
  - SMCWPPP has a group subscription
  - Contact your agency CII Subcommittee representative for information on how to access the portal
  - [www.casqa.org](http://www.casqa.org)
  - BMPs by Business Category or Source Control

# CASQA BMP Fact Sheets

## Outdoor Liquid Container Storage SC-31

### Description

Accidental releases of materials from above ground liquid storage tanks, drums, and dumpsters present the potential for contaminating stormwater with many different pollutants. Tanks may store many potential stormwater runoff pollutants, such as gasoline, aviation gas, diesel fuel, kerosene, oils, greases, lubricants and other distilled, blended and refined products derived from crude petroleum. Materials spilled, leaked, or lost from storage tanks may accumulate in soils or on other surfaces and be carried away by rainfall runoff. These source controls apply to containers located outside of a building used to temporarily store liquid materials and include installing safeguards against accidental releases, installing secondary containment, conducting regular inspections, and training employees in standard operating procedures and spill cleanup techniques.

### Approach

#### General Pollution Prevention Protocols

- ☐ Educate employees about pollution prevention measures and goals.
- ☐ Keep an accurate, up-to-date inventory of the materials delivered and stored on-site.
- ☐ Try to keep chemicals in their original containers, and keep them well labeled.
- ☐ Develop an operations plan that describes procedures for loading and/or unloading. Refer to SC-30 Outdoor Loading/Unloading of Materials for more detailed BMP information pertaining to loading and unloading of liquids.
- ☐ Protect materials from rainfall, run-on, runoff, and wind dispersal:
  - ✓ Cover the storage area with a roof.

### Objectives

- Cover
- Contain
- Educate
- Reduce/Minimize

### Targeted Constituents

Sediment	
Nutrients	✓
Trash	
Metals	✓
Bacteria	
Oil and Grease	✓
Organics	✓

### Minimum BMPs Covered

	Good Housekeeping	
	Preventative Maintenance	✓
	Spill and Leak Prevention and Response	✓
	Material Handling & Waste Management	✓
	Erosion and Sediment Controls	
	Employee Training Program	✓
	Quality Assurance Record Keeping	✓



## Outdoor Liquid Container Storage SC-31

- ✓ Minimize stormwater run-on by enclosing the area or building a berm around it.
- ✓ Use a walled structure for storage of liquid containers.
- ✓ Use only watertight containers and keep the lids closed.
- ☐ Employ safeguards against accidental releases:
  - ✓ Provide overflow protection devices to warn operator or automatic shutdown transfer pumps.
  - ✓ Provide protection guards (bollards) around tanks and piping to prevent damage from a vehicle or forklift.
  - ✓ Provide clear tagging or labeling, and restrict access to valves to reduce human error.
  - ✓ Berm or surround tank or container with secondary containment system, including dikes, liners, vaults, or double walled tanks.
  - ✓ Be aware and ready to address the fact that some municipalities require secondary containment areas to be connected to the sanitary sewer, prohibiting any hard connections to the storm drain.
  - ✓ Contact the appropriate regulatory agency regarding environmental compliance for facilities with "spill ponds" designed to intercept, treat, and/or divert spills.
  - ✓ Have registered and specifically trained professional engineers identify and correct potential problems such as loose fittings, poor welding, and improper or poorly fitted gaskets for newly installed tank systems.
- ☐ Use MSDSs to ID hazardous components and keep incompatible products apart and to list/have available appropriate PPE and clean-up products.



### Good Housekeeping

- ☐ Provide storage tank piping located below product level with a shut-off valve at the tank; ideally this valve should be an automatic shear valve with the shut-off located inside the tank.
- ☐ Provide barriers such as posts or guardrails, where tanks are exposed, to prevent collision damage with vehicles.
- ☐ Provide secure storage to prevent vandalism-caused contamination.
- ☐ Place tight-fitting lids on containers.

# Contact Information

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