

NEBC MANAGING STORMWATER IN WASHINGTON

AVOIDING 3RD PARTY LAWSUITS

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PROBLEM AVOIDANCE

- What we are going to talk about
 - ▣ Industrial General Stormwater Permit (ISGP)
 - ▣ Stormwater Pollution Prevention Plan
 - ▣ Best Management Practices
 - ▣ Monitoring Program
 - ▣ Reporting
 - ▣ Corrective Actions
 - ▣ Contaminant Sources
 - ▣ Disposal Options
 - ▣ Time Extensions and Waivers
 - ▣ Auditing your compliance



STORMWATER PERMITS IN WASHINGTON

- General vs. Individual Permits
 - Which one is better for you and why?
 - Benchmarks vs. Effluent limits
 - Compliance aspects
 - General - Level 1, 2, 3
 - Individual - Effluent limit exceedances
 - Cost
 - Mixing Zones
 - Receiving Waters
 - Storm Sewers
 - Background contaminant levels
 - Exclusion for Impaired Waters



STORMWATER POLLUTION PREVENTION PLANS

- SWPPPs – A working document
- Why its important
- Critical requirements
- Keeping it up-to-date
- Using it for day-to-day operations
- Tracking of inspections and reporting
- USE IT TO DOCUMENT YOUR PROGRAM!



BEST MANAGEMENT PRACTICES

- Mandatory BMPs
 - ▣ ISGP – Mandatory unless justified
- BMPs and your SWPPP
- Adaptive Management Approach to BMPs
- How to evaluate BMP effectiveness
 - ▣ Phasing and monitoring
 - ▣ Bench or Pilot testing



BMPs in Action



MONITORING PROGRAM

- Sampling and Visual
- Failure to Monitor = Permit Violation = Fine



MONITORING PROGRAM

- Identifying good monitoring points
- Reducing monitoring points – less is better
- Locating problem areas by an internal monitoring program
- The potential advantage of multiple events
 - ▣ Quarterly events not limited to one
 - ▣ If you have a poor result then you can correct problem areas, resample, then average the results.
 - ▣ More events could lower average



REPORTING PROGRAM

- Discharge Monitoring Report – (DMR)
 - ▣ Check form for correctness
 - ▣ Complete each required area carefully
 - ▣ Send it in on time
 - ▣ Keep a copy in case its misplaced
- Level 1, 2, and 3 Reporting Requirements
 - ▣ Level 1 – quarterly DMR due date
 - ▣ Level 2 – annual report and Sept. of next year
 - ▣ Level 3 – annual report and Sept. of next year



CORRECTIVE ACTIONS

- HIERARCHY OF ACTIONS
- CHECK YOUR BMPs
- CHECK YOUR EMPLOYEE'S UNDERSTANDING
- ADD or INCREASE OPERATIONAL BMPs
- Level 2 – ADD STRUCTURAL BMPs – limit exposure, covered storage, separation
- Level 3 – ADD TREATMENT BMPs –
- WAIVER REQUEST



EMPLOYEE EDUCATION



Remember: ONLY RAIN DOWN THE STORM DRAIN!

You Can Be the Solution to Water Pollution!



STORMWATER TREATMENT



CONTAMINANT SOURCES

- Specific to your operations, but consider:
 - Heavy Traffic = zinc, copper, oil/grease
 - Tracking of contaminants by traffic
 - Metal Buildings = zinc (even if they are new)
 - Birds and Wildlife = phosphorus, BOD/COD
 - Unpaved or poor pavement = turbidity, TSS
 - Groundwater Intrusion = GW contaminants
 - Outside storage of raw or finished product
 - Run-on from outside your facility



DISPOSAL OPTIONS FOR STORMWATER

- Discharge to storm sewer
- Discharge to receiving water
- Discharge through open infiltration ponds
 - dependent on soil and g-w conditions
- Discharge through Underground Injection Points – problematic





TIME EXTENSIONS AND WAIVERS

- Time extensions for Level 2 and 3 responses
 - Fact Sheet mentions the following ex.
 - Permitting
 - Weather
 - Fish windows
- Justification for Waiver – “Infeasible”
 - No examples provided in Fact Sheet
 - Federal MSGP references:
 - Limited Available Technology
 - Financial Constraints



AUDITING YOUR COMPLIANCE

- Keeping your SWPPP up-to-date
 - ▣ Monitoring points
 - ▣ Site, material or industrial activity changes
 - ▣ Current BMPs
- Checking on your site BMPs
- Keeping employee training up-to-date
- Making sure reports have been filed on time and are on file at Ecology



SUMMARY

- The new Industrial Stormwater General Permit presents new challenges and opportunities.
- Being proactive with your stormwater program could save you money and stress.
- Keeping track of your program through internal audits can help avoid problems.



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