Los Angeles County
Office of Education

Facilities Network Meeting

Industrial Storm Water
General Permit Update

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Presented By
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What’s The Concept?

• The Industrial Permit regulates the discharge of storm water into protected “receiving waters” such as lakes, rivers, and oceans

• Rules are made to mitigate and prevent problems to receiving and ground waters from industrial use sites
Activities Requiring An Industrial Permit

Manufacturing Facilities; Oil & Gas Mining; Hazardous Waste Treatment Plants; Disposal Facilities; Landfills/Dumps; and Transportation Facilities such as:

School District Bus Maintenance Yards involved in vehicle maintenance and rehabilitation, mechanical repairs, painting, fueling, and lubrication or other industrial activities
What Are The New Regulations…?

• See five page summary in your hand outs

• There are 27 major changes or new requirements in the regulations

• I’ll be going over just a few of the key issues
Key Issues

• **Numeric Action Limits and Numeric Effluent Limits**

  If a district exceeds the NALs and NELs they must take corrective actions. If the corrective action does not correct the problem, the district would be subject to mandatory minimum fines (Total Suspended Solids, Oil/grease, pH, and connectivity)
Key Issues

• **Compliance Storm Event**

  Establishes a 10 year, 24 hour compliance storm event for the discharge of Total Suspended Solids and for any treatment related Best Management Practice

  (Standard is heaviest storm event over a 10 year period measured in inches)
Key Issues

• **Measurement of Rain Events**
  Districts would have to purchase and install a measuring device to record all rain events to determine “qualified and unqualified” storm events and prepare a report for each event.

• **Pre-Storm Inspections**
  Districts would be required to perform a pre-storm inspection of storm water drainage areas if rain is predicted for the following day.
Key Issues

• **Mandatory Minimum Best Management Practices (BMPs)**

  Incorporate into the SWPPP...8 minimum housekeeping BMPs which will require over 300 more inspections annually, preparation of a report for each inspection, and recordation of the reports

  This regulation could require the district to make facility improvements
Key Issues

• **Qualified SWPPP Practitioner**

School district staff who currently perform the monitoring, water sampling, and reports preparation for permit compliance must successfully complete the State Water Board sponsored training course (pass the examination…?) within one year of the passage of the new Industrial Permit.
Key Issues

• **Water Sampling Will Increase**
  From 0 to a minimum of 4 for 60 percent of districts in Group Monitoring

  If Level 1…4 water samplings annually
  If Level 2…8 water samplings annually
  If Level 3…Unlimited samplings annually

  From first hour of rain to operating hours window
  From preceded by 3 dry days to 2 dry days
Key Issues

• **Cost**

Estimated annual cost for compliance is $29,400. However costs could escalate to over $100,000 if structural BMPs, treatment controls, or additional monitoring is required.
Permit Revision Process

• Original Industrial Permit issued 1997
• Preliminary draft issued June 2003
• Second draft issued September 2004
• Most recent public hearing March 29, 2011 (after 14 years)
March 29, 2011 Public Hearing

- SWRCB overview
- Metal recycling representatives
- Environmental representatives
- CASQA panel: They “rocked” the SWRCB
- Elected officials: Assemblyperson Jeff Miller and Senator Rod Wright: Provided “direction”
- Education: Ian Padilla, CASH; Steve Herrera, Psomas; and Roger Chang, LACOE
What Did Education Tell the SWRCB…?

(1) Schools cannot absorb new costs ($29,400 to $100,000) because of past and new budget reductions

(2) Mandated program without mandated cost recovery

(3) Education’s budget has been reduced more than any other state program
What Did Education Tell The SWRCB...?

(4) Keep Group Monitoring

(5) Education is unique...has always been treated differently

(6) We agree with CASQA...too much extra work and cost with very little water quality benefit
District Actions Needed

• Monitor Industrial Permit Process

• Participate in “Comments” Letter Writing Campaign…it does make a difference

• Your not just lobbying against the Industrial Permit…you are lobbying to stop these same requirements from being included in the Industrial and Small Municipal Separate Storm Sewer Systems (Small MS4) Permits
What’s The Goal…?

• The Small MS4 Permit will probably govern all school district storm water compliance in the future and has separate Construction and Industrial Sections

• By stopping the inclusion of “Issue Items” in the Industrial Permit…we may be successful in taking out these same “Issue Items” in the Construction Section of the Small MS4

Questions…?