

SCVURPPP
Industrial and Commercial Inspector
Stormwater Training

Industrial Case Study
NOI Filer ?

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Industrial Facility

SIC 3679 (Electronic Components, Not Elsewhere Classified)



IGP Attachment A

2. Manufacturing Facilities:

Facilities with Standard Industrial Classifications (SICs) 20XX through 39XX, 4221 through 4225.

(This category combines categories 2 and 10 of the previous general permit.)

Pre-Inspection Revue

- Prior History:
 - 5/28/2010: Complaint on dust collection system, not a concern however due to the amount of spray finishing, sanding and arc spraying going on in the building; changed to a Fire Prevention inspection area.
 - 3/19/2014: Clean roof area of all dust, sand and powder coating residue

Initial Inspection 4/20/2016

- 8.2-Clean up process residue in the back-use shop vac and dispose
- Develop a procedure to ensure dust does not accumulate-include employee training protocol



Equipment Maintenance

Filter Element Removal & Cleaning of Metco MPE Dust Collector

- Before starting put on safety goggles, mask, and safety suit.
- Take into account the weather; make sure it is not rainy or windy while cleaning the dust collector.
- Set up and install portable containment bags.
- Start at the top access ports of the unit so dust that falls down into hopper area does not have open access to the ports below.
- Remove cover by rotating knob counter clockwise.
- Move the filters to break gasket seals between elements and sealing surface.
- Rotate element slowly $\frac{1}{2}$ turn to dump any loose dirt off of the top of the element.
- Slide filter off yoke and place into bag.
- Check for accumulation of dust and clean.
- Reinstall filters seal end towards back of dust collection.
- Reinstall cover by rotating knob clockwise.
- Clean and Vacuum "using hepa filters" entire dust collection area.

MA.031

Rev. 2



Daily Maintenance of Dust collection Area

- Check the area daily
- If necessary sweep and shopvac
- Booms will be used around the drainage area when the weather requires it.

Google Aerial View



Annual Inspection 8/30/2016

- Contact the RWQCB regarding filing an NOI (Notice of Intent) or NEC (Non Exposure Certification)
- Clean Process residue off the roof & remove misc. debris from roof
- Clean (shopvac) dust from outside containment area at the blower outside

Annual Inspection 8/30/2016



Re-Inspection 9/13/2016

- Contact the RWQCB regarding filing an NOI (Notice of Intent) or NEC (Non Exposure Certification)--**Having problems with SMARTS**
- Clean Process residue off the roof & remove misc. debris from roof--**Needs more time**
- Clean (shopvac) dust from outside containment area at the blower outside--**Minimum BMPs in place**

Re-Inspection 9/22/2016

- Contact the RWQCB regarding filing an NOI (Notice of Intent) or NEC (Non Exposure Certification)—**Hired Consultant**
- Clean Process residue off the roof & remove misc. debris from roof—**In process of cleaning**
- Clean (shopvac) dust from outside containment area at the blower outside--
Minimum BMPs in place

Re-Inspection 9/22/2017



Progress Assessment Inspection

4/27/2017

- Company hired a full time QISP (last week)
- One indoor blower vent has been disconnected from the roof
- BMPs are being evaluated and implemented
- Increased employee training
- Planning on smoke testing the storm conveyance system (discharge points)
- Trying to remain in baseline status

Progress Assessment Inspection

4/27/2017

- Planning to file NOI and PRDs by 7/1/2017
- Provide City with status report upon filing
- Facility being proactive to avoid potential permit violations which trigger additional requirements
- Contracted with mapistry.com

Progress Assessment Inspection

4/27/2017

- Continue to process the NOI for filing (anticipated date to file 7/2017)
- Continue to clean residue from the roof and area around blower (evaluate BMP effectiveness)

Progress Assessment Inspection

4/27/2017



NOI Filers vs Non-Filers

- NOI Filers are required to self certify compliance
- Mandates four samples per year in addition to monthly visual inspections
- SWPPP provides an assessment and plan for discharges associated with industrial activities
- Must comply with Numeric Action Levels
- Exceedances trigger additional requirements

NOI Filers vs Non-Filers

- Two(2) NAL exceedances in a row per year moves the facility to Level 1 (mandates that a QISP evaluate cause of NAL exceedance and implements additional control measures (Level 1 Exceedance Response Action - ERA)
- Continued exceedances the following year (same parameter) moves the facility to Level 2 (Mandates a Level 2 ERA Action Plan and Level 2 ERA Technical Report) Demonstration Projects

NOI Filers vs Non-Filers

- Compliance must be achieved or the facility must prove that they will never be able to comply which means they will remain in Level 2 indefinitely
- As a city inspector, I would not be able to dictate this aggressive of a response and would not know if discharges exceed limits or permit requirements.

Questions?

