

Case Scenario

Recycling Facility



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Environmental Inspector II
Watershed Enforcement
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Environmental Services



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Discolored discharge observed during initial



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Discolored Discharge



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Loading dock conditions

Observations:

Uncovered metal containers

Sheen visible on water

Sludge



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Location of City Storm Drain



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Site map from SWPPP on SMARTS



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Actual Storm Drain Locations



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Storm Drain #1

Observations:
Fabric filter appeared saturated with oil
Sheen visible on water
Metal shavings
Sludge



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Storage Near Storm Drain #1



Observations:
Uncovered metal containers
Seen visible on water
Sludge

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Storage near Storm Drain #2



Observations:
Uncovered metal containers
Sheen visible on water
Sludge

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Discharge to Storm Drain #2

Observations:
Lack of BMPs
Sheen visible on water
Sludge



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Discharge to Storm Drain #2



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Location of Storm Drain #3



Observations:
Uncovered metal
Sheen visible on water

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Storm Drain #4 (under metal plate)



Observations:
Loose litter
Mud and sludge

01/09/2018 12:32

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NOI status

NOI filed with waterboards

No recent annual report or sampling uploaded

Last Annual Report uploaded to SMARTS 2014/2015

Last Sampling 1/21/2016



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What violation(s) would you issue?



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Site History – Previous Violations

01/10/2017 – Garbage cans/dumpsters
01/04/2017 – Process area & Used parts storage
01/03/2017 – Garbage cans/dumpsters (Administrative Citation)
01/03/2017 – Catch Basin/drop inlet/storm system
04/07/2016 – Catch Basin/drop inlet/storm system
04/06/2016 – Process residues, debris, broken glass, solid waste, scrap
03/26/2015 – Catch Basin/drop inlet/storm system (Administrative Citation)
03/26/2015 – Loose trash/litter
03/26/2015 – Parking lot/yard
08/19/2013 – Storm drain gutter (Administrative Citation)
04/29/2013 – Dirt lot/dirt driveway/entrance
04/29/2013 – Catch basin/drop inlet/storm system (Administrative Citation)
03/29/2011 – Dirt lot/dirt driveway/entrance
03/02/2010 – Protection from accidental discharge
03/02/2010 – Catch basin/drop inlet/storm system
04/22/2009 – Catch basin/drop inlet/storm system
04/16/2009 – Catch basin/drop inlet/storm system
05/22/2007 - Catch basin/drop inlet/storm system
11/01/2005 - Catch basin/drop inlet/storm system
10/21/2004 - Catch basin/drop inlet/storm system
10/21/2004 - Garbage cans/dumpsters
10/21/2004 – Loading dock area
10/21/2004 – Process area
10/21/2004 – Scrap Yard



Stormwater Discharge Violation History

Process residue and litter scattered throughout the site and in storm drains

Spills during loading and unloading activities on street

Open and leaky dumpsters and scrap bins stored on street

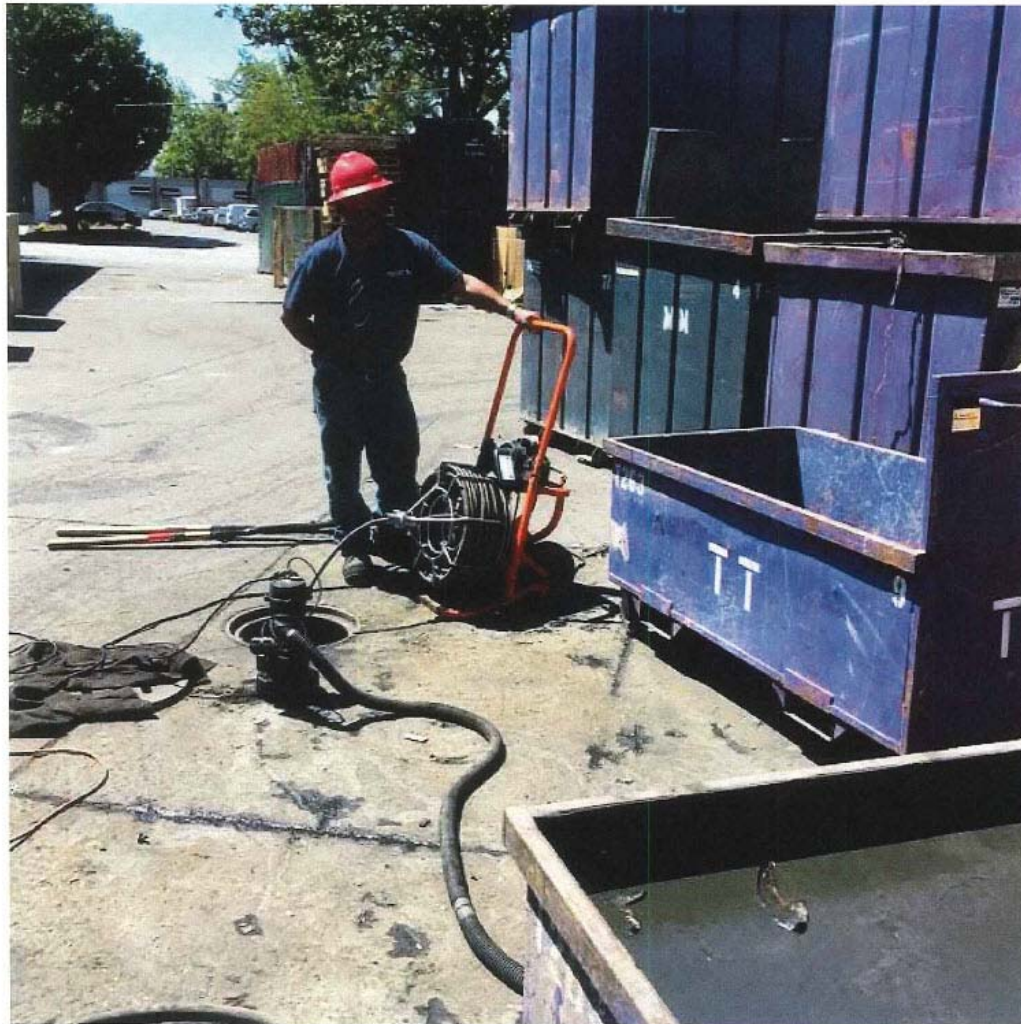
Bypassing BMPs in place to control TSS & O&G

Previous violations - 2017



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Previous violations - 2015



← Liquid material removed from drain

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Previous violations - 2013



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How would you escalate violation(s)?

Site History – Previous Violations

- 01/10/2017 – Garbage cans/dumpsters
- 01/04/2017 – Process area & Used parts storage
- 01/03/2017 – Garbage cans/dumpsters (Administrative Citation)
- 01/03/2017 – Catch Basin/drop inlet/storm system
- 04/07/2016 – Catch Basin/drop inlet/storm system
- 04/06/2016 – Process residues, debris, broken glass, solid waste, scrap
- 03/26/2015 – Catch Basin/drop inlet/storm system (Administrative Citation)
- 03/26/2015 – Loose trash/litter
- 03/26/2015 – Parking lot/yard
- 08/19/2013 – Storm drain gutter (Administrative Citation)
- 04/29/2013 – Dirt lot/dirt driveway/entrance
- 04/29/2013 – Catch basin/drop inlet/storm system (Administrative Citation)
- 03/29/2011 – Dirt lot/dirt driveway/entrance
- 03/02/2010 – Protection from accidental discharge
- 03/02/2010 – Catch basin/drop inlet/storm system
- 04/23/2009 – Catch basin/drop inlet/storm system
- 04/16/2009 – Catch basin/drop inlet/storm system
- 05/22/2007 – Catch basin/drop inlet/storm system
- 11/01/2009 – Catch basin/drop inlet/storm system
- 10/21/2004 – Catch basin/drop inlet/storm system
- 10/21/2004 – Garbage cans/dumpsters
- 10/21/2004 – Loading dock area
- 10/21/2004 – Process area
- 10/21/2004 – Scrap yard

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2017



2015

Liquid material removed from drain



2013

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Storm Drain #1 – Follow-Up



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Storm Drain #1 – Follow-Up



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Storm Drain #2 – Follow-Up



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Storage Near Storm Drain #2 – Follow-Up



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Storage Drain #3 – Follow-Up



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Current actions

- \$750 Administrative Citation issued
- Site collected sample in Feb. 2018
- Site was referred to the waterboards

Client Sample ID: DP1 (Front Drain)						Lab Sample ID: 440-205377-1			
Date Collected: 02/26/18 10:00						Matrix: Water			
Date Received: 03/08/18 09:30									
Method: 200.7 Rev 4.4 - Metals (ICP) - Total Recoverable									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Iron	1.5		0.10	0.050	mg/L		03/16/18 12:14	03/17/18 19:54	1
Method: 200.8 - Metals (ICP/MS) - Total Recoverable									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aluminum	0.74	B	0.010	0.0050	mg/L		03/16/18 12:29	03/16/18 22:31	1
Lead	0.11		0.0010	0.00050	mg/L		03/16/18 12:29	03/16/18 22:31	1
Zinc	0.68	B	0.020	0.0025	mg/L		03/16/18 12:29	03/16/18 22:31	1
General Chemistry									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total Suspended Solids	43	H	6.7	3.3	mg/L			03/15/18 17:36	1
Chemical Oxygen Demand	100		20	10	mg/L			03/22/18 13:25	1
Method: Field Sampling - Field Sampling									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	7				SU			02/26/18 10:00	1
Client Sample ID: DP2 (Back Drain 1)						Lab Sample ID: 440-205377-2			
Date Collected: 02/26/18 10:00						Matrix: Water			
Date Received: 03/08/18 09:30									
Method: 200.7 Rev 4.4 - Metals (ICP) - Total Recoverable									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Iron	2.4		0.10	0.050	mg/L		03/16/18 12:14	03/17/18 19:57	1
Method: 200.8 - Metals (ICP/MS) - Total Recoverable									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Aluminum	1.4	B	0.010	0.0050	mg/L		03/16/18 12:29	03/16/18 22:33	1
Lead	0.14		0.0010	0.00050	mg/L		03/16/18 12:29	03/16/18 22:33	1
Zinc	0.80	B	0.020	0.0025	mg/L		03/16/18 12:29	03/16/18 22:33	1
General Chemistry									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Total Suspended Solids	74	H	10	5.0	mg/L			03/15/18 17:36	1
Chemical Oxygen Demand	110		20	10	mg/L			03/22/18 13:26	1
Method: Field Sampling - Field Sampling									
Analyte	Result	Qualifier	RL	MDL	Unit	D	Prepared	Analyzed	Dil Fac
Field pH	7				SU			02/26/18 10:00	1

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