

# Case Scenario

## Rubber Manufacturing Facility



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Watershed Enforcement  
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*Environmental Services*



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- Manufacturer of specialty rubber products such as rubber tiles, stair treads, baseboards etc.
- SIC 3069 – Fabricated Rubber Products

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## Question!

- Per the Industrial General Permit, facilities must sample and test for 3 standard parameters, O&G, TSS, and pH.
- What additional parameter must misc. fabricated rubber product(SIC 306X) facilities test for?
- Answer: **Zn**



# NOI status

NOI filed with waterboards

SWPPP is up to date

Level 2 status for exceedance of Zn

- Facility identified deficiencies in housekeeping and outdoor material tracking in their Exceedance Response Action Plan



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# Observation made on initial Inspection



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# Conditions of BMPs

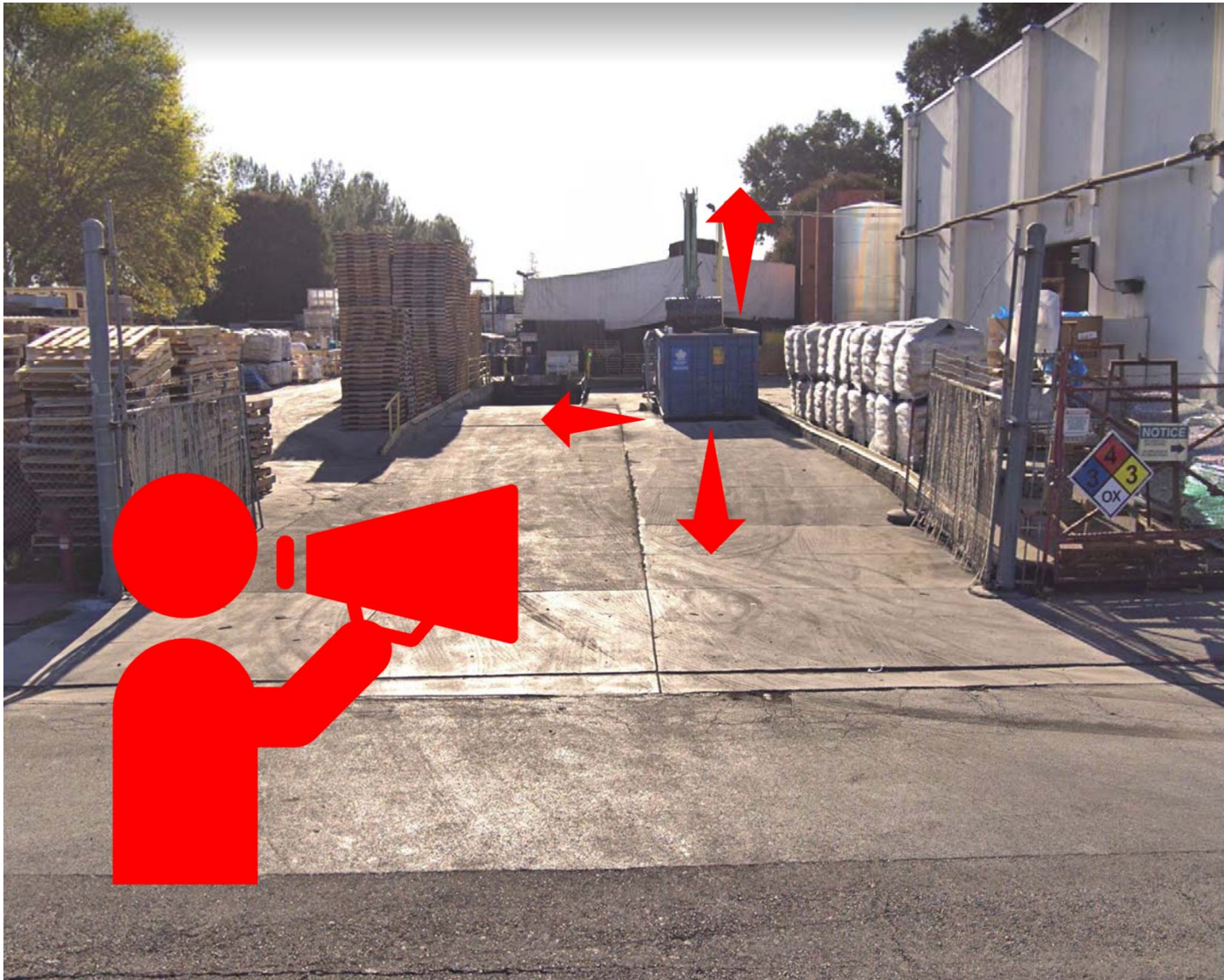


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# Waste Management



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## Industrial Waste

- Where does it flow to?
- Where does it blow to?

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# What violation(s) would you issue?



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# Site History – Previous Violations

- 09/15/2017 – Garbage cans/dumpsters **(Official Warning Notice)**
- 09/15/2017 – Used parts storage **(Official Warning Notice)**
- 09/15/2017 – Catch basin/drop inlet **(Official Warning Notice)**
- 03/30/2016 – Loose trash/litter
- 03/30/2016 – Catch basin/drop inlet
- 04/16/2015 – Garbage cans/dumpsters
- 04/16/2015 – Illicit connection to storm drain **(Administrative Citation Referral)->(Administrative Citation)**
- 04/16/2015 – Loading dock area
- 04/16/2015 – Process area
- 04/16/2015 – Catch basin/drop inlet
- 04/03/2014 – Wash water/Mop water
- 05/14/2012 – Oil stains, leaks, and spills

# Previous violations - 2015



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# City of San Jose's Response

Violations and Remedial Action Issued:

- Garbage cans/compactors
  - Effect method to protect storm drain
  - Clean up using dry methods.
- Process Area
  - Clean up using dry methods.
  - Sweep/increase sweeping frequency sufficient to prevent storm drain pollution
- Catch basin/drop inlet
  - Clean up using dry methods.
  - Replace BMPs

Violations were escalated to Administrative Citation Referral **(ACR)** due to existing violation history.

Short term and long term solutions were discussed regarding resolving dumpster violation.

# On follow up, BMPs Refreshed



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# Site swept



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Dumpster not covered on follow up and during a rain event.

Second ACR Issued

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# Final Follow Up – Dumpster covered



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## Current actions

- Facility has put in motion long term solution for waste management issue
- \$500 Administrative Citation issued
- Based on violation history, site will be inspected on an annual basis

# Questions?



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