

Annual Stormwater Inspection Training Workshop

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Planned Presentation Contents:

- Short introduction to the City of Richmond & our group/ program
- Key Components of Inspecting the Industrial Facility BNSF Railroad Maintenance Yard
- Questions & review

Richmond, CA





A little about the City of Richmond's Environmental Compliance Group. . .

- Responsible for:
 - Industrial Pretreatment Program (IPP) pursuant to NPDES Permit No. CA0038539
 - ☐ Industrial Wastewater Discharge Compliance
 - ☐ Commercial/ Industrial Fats, Oils, Grease (FOG) Compliance
 - ☐ Education/ Outreach
 - Stormwater Management & Compliance pursuant to the SF Bay Region
 Municipal Regional Stormwater NPDES Permit (MRP) No. CAS612008
 - ☐ All of the MRP's Provisions (e.g. C.3, C.4, C.5, C.6, C.7)
 - More and more each day. . .



Inspectors generally wear multiple hats each with particular responsibilities



Image Source: Gingrapp.com



Stormwater Program

- The city's stormwater program seeks to maintain a healthy aquatic environment by keeping pollutants out of the storm drain system, creeks, and the bay. The program strives to reduce trash and pesticide use, engage residents, and educate businesses on practices to reduce or eliminate pollutants in our water bodies.
- Utilizes Richmond Municipal Code (RMC) Chapter 12.22 -STORMWATER MANAGEMENT AND DISCHARGE CONTROL



Our group issues Stormwater Compliance Permits to select Commercial and Industrial facilities based on site-specific criteria authorized by our Municipal Code:

RMC 12.22.090 - Best management practices and standards.

(a) ... The City reserves the right to permit facilities that potentially contribute pollutants to stormwater. . .

FOR EXAMPLE...

STORMWATER PROGRAM

CITY OF RICHMOND

2016 - 2019



450 Civic Center Plaza Richmond, CA 94804

Phone: 510-620-6594 Fax: 510-307-8195 http://www.ci.richmond.ca.us/stormwater

COMPLIANCE PERMIT

Business Address:
BURLINGTON NORTHERN SANTA FE
980 HENSLEY ST BLDG 417

 Parcel APN:
 561-390-005-8
 Today's Date:
 03-01-2016

 Permit:
 SW 16-00486
 Date Issued:
 07-01-2016

 Type of Business:
 TRANSPORTATION
 Expiration Date:
 06-30-2019

 WDID Number:
 2 07/1012998

PROPERTY OWNER: UNKNOWN OWNER Business Owner: BURLINGTON NORTHERN SANTA FE
Street Address: 303 S GARRARD BLVD Mailing Address: 980 HENSLEY ST BLDG 417

City/St/Zip: RICHMOND, CA 94801-2000 City/St/Zip: RICHMOND CA 94801 Business License:
Owner Phone: Exp:

In accordance with Chapter 12.22 Richmond Municipal Code (RMC), the above named business is authorized to discharge uncontaminated stormwater to the City's stormwater collection system, subject to the terms and conditions below.

COMPLIANCE REQUIREMENTS

I. The Permit Holder is prohibited from: (RMC 12.22.060)



(b) Discharging stormwater from premises or activities that causes or contributes to a violation of receiving water limitations in the City's NPDES permit is prohibited.

II. The Permit Holder shall implement Best Management Practices and Standards as follows: (RMC 12.22.090)

- (a) Generally. Any person owning or operating premises that may contribute pollutants to the City's stormwater system shall undertake all practicable best management practices to reduce the potential for pollutants entering the system. Examples of such premises include, but are not limited to, parking lots, gasoline stations, industrial facilities, and other commercial enterprises.
- (b) Litter. No person shall throw, deposit, leave, keep or permit to be thrown, deposited, placed, left or maintained, any refuse, rubbish, garbage or other discarded or abandoned objects, articles or other litter in or upon any street, alley, sidewalk, business place, creek, stormwater system, fountain, pool, lake, stream, river or any other body of water, or upon any public or private parcel of land so that the same might become a pollutant, except in containers or in lawfully established waste disposal facilities.
- (c) Sidewalks. The occupant or tenant, or in the absence of occupant or tenant, the owner or proprietor of any real property in front of which there is a paved sidewalk shall maintain said sidewalk free of dirt or litter to the maximum extent practicable. Sweepings from the sidewalk shall not be sweept or otherwise made or allowed to go into the gutter or roadway, but shall be disposed of in receptacles maintained as required for the disposal of solid waste.
- (d) Parking Lots, Paved Areas and Related Stormwater Systems. Persons owning, operating or maintaining a paved parking lot, the paved areas of a gasoline station, a paved private street or road, and related stormwater systems shall clean those premises as frequently and thoroughly as practicable in a manner that does not result in the discharge of pollutants to the City's stormwater system.
- (e) Compliance with Best Management Practices. Where best management practices (BMPs) guidelines or requirements have been adopted by any federal, state, regional, city or county agency, for any activity, or operation of premises which may cause or contribute to non-stormwater discharges, every person undertaking such activity, operation or owning and operating such premises shall comply with such guidelines or requirements. Failure to implement and maintain Best Management Practices (adopted from the California Stormwater BMP Handbook, January 2003) included in a storm water permitor Stormwater Pollution Prevention Plan (SWPPP) are subject to administrative citations.

REPORTING REQUIREMENTS

The Permit Holder shall report to the City of Richmond - Stormwater Program any changes to the premises or operations that significantly deviate from the terms and conditions of this Permit. The Permit Holder shall notify City of Richmond - Stormwater Program at (510) 307-8135 during business hours, or Police Dispatch at (510) 620-6933 during non-business hours, immediately upon discovering any spill or non-stormwater discharge to the stormwater sewer. Formal written notification describing the circumstances and corrective action must be submitted to the City before the next rain event but no longer than ten business days of the occurrence.

AUTHORIZATION

The terms and conditions of the permit may be subject to modification by the City during the term of the permit as requirements are modified or other just cause exists. This permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without prior written approval by the City. The permittee shall be notified of any proposed changes in this permit at least 30 days prior to the effective date of such changes.

INSPECTIONS

The City of Richmond may conduct routine random, announced and/or unannounced inspections to verify compliance with the conditions of this Permit as authorized by the City Ordinance, Article 12 Chapter 22.110.

ENFORCEMENT AND PENALTIES

The City of Richmond will pursue enforcement and penalties as authorized by the City Ordinance, Article 12 Chapter 22.120 -140.





How to approach a BNSF Stormwater Site Inspection?



Source: TheGuardian.com



Step 1: Review historic inspections, records, etc.

Potential Resources:

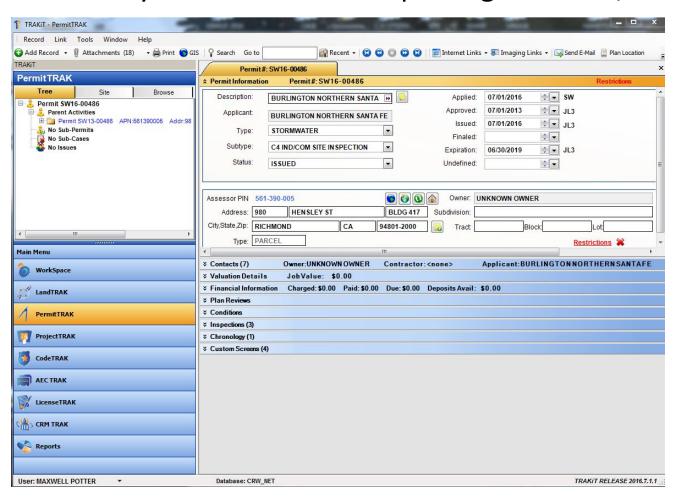
- Written inspection records
 - □ Reports, enforcement actions, documents, letters, notes, etc.
- SMARTS
 - ☐ SWPPP, Operations, BMPs, Discharge Points, etc.
- City GIS Records & Maps
 - MS4 connection point
- Online Public Mapping
 - ☐ You never know what you might find. . .



Step 1: Review historic inspections, records, etc.

- Our group utilizes a City-Wide electronic reporting software,

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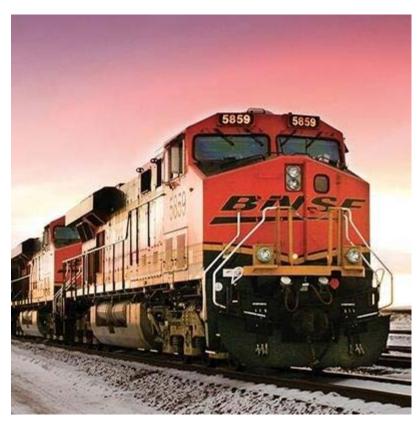


Image Source: Indeed.com

Burlington Northern Santa Fe Richmond Railyard

- Location: 980 Hensley St, Richmond, CA 94801
- NOI Facility WDID #: 2 07I012998
- SIC Classification: 4011,
 4013
- Primary Operations:

 Railroads, Line-Haul
 Operating; Railroad
 Switching and Terminal
 Establishments
- Site Contact: Eddie Phillips



Step 2: Review SMARTS via Public User Domain

General Operations and Facility Description:

- The 162.5-acre Facility is a rail switchyard that conducts fueling of locomotives and maintenance of railcars and locomotives.
- The Industrial Activity Areas (IAAs) associated with these activities cover approximately 5.0 acres, with approximately 95 percent of that area being impervious surface (e.g., concrete, asphalt, or buildings).
- The Facility conducts normal operations 24 hours a day, 7 days a week, and maintains a staff of approximately 30 employees.

Information Source: BNSF SWPPP via SMARTS







Step 2: Review SMARTS via Public User Domain

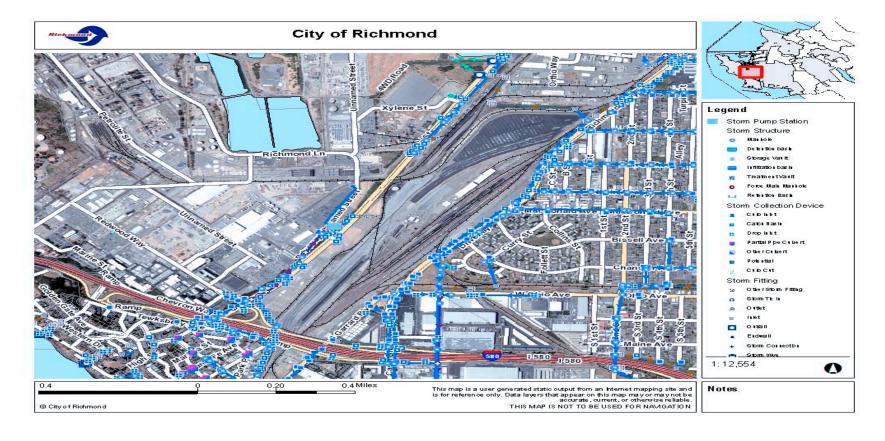
- Site Operations, map(s) & discharge locations
 - ☐ BNSF discharges into City's MS4 via two locations
- Potential pollutants on-site
 - Sediment, petroleum products (e.g., fuels, oils, and grease lubricants), and metals (copper, iron, nickel, and zinc)
- Active site-specific Best Management Practices (BMPs) for pollution prevention

Step 3: Review City GIS documents and maps

No direct drain inlets within immediate drainage pattern of facility

Bich mond

Waterway along northern perimeter of facility





Preparation for inspection:

- Scheduled/ unscheduled inspection (pros vs. cons)
- Print out pertinent documents
 - Site inspection form pre-filled out (e.g. site contact, property owner, etc.)
 - Site maps, inspection records, SMARTS data, Municipal Code
- Sampling kit
 - Hopefully you will not need it...



Site Inspection:

Question:

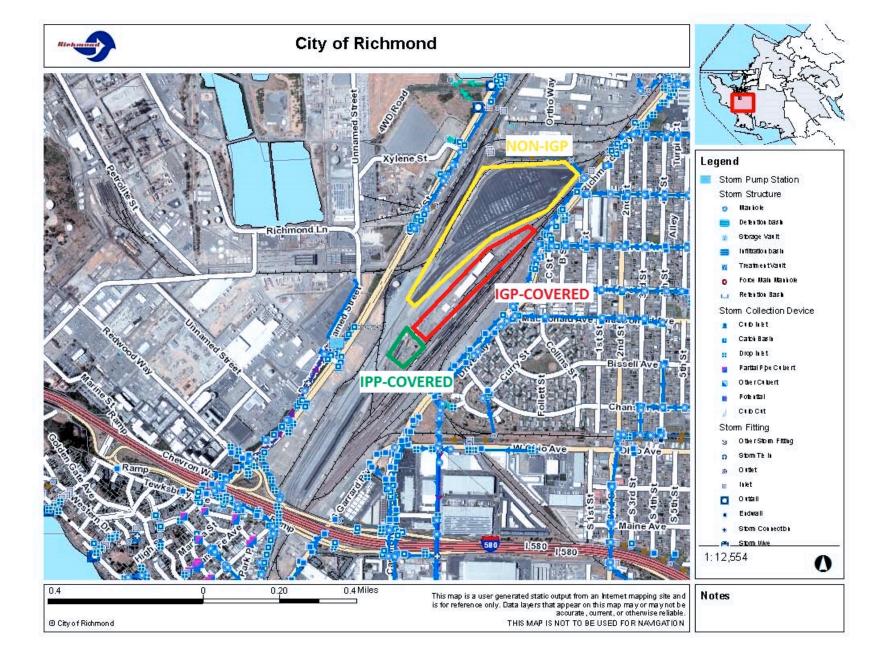
What is the PRIMARY goal of your inspection?

Answer:

 To ensure compliance with local Municipal Code(s) & Regulations . . . and State/ Federal Regulations

Problem:

Sifting through Industrial General Permit (IGP)
vs. local Municipal Code(s) Regulations and
requirements





Site Inspection:

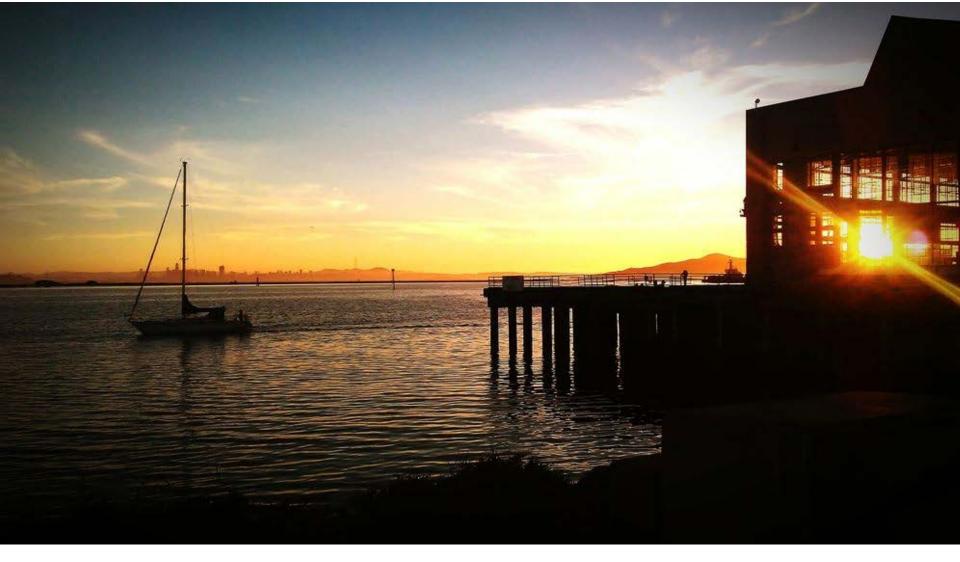
- Document review
 - ☐ Spill Prevention, Control and Countermeasure (SPCC) Plan, training records, hazardous waste manifests, chemical SDSs on-site)
- Signs of spills & illicit discharges
 - ☐ Visually inspect stormwater drain inlets, catch basins, and manholes (if safe and possible)
- Site BMP implementation
 - Confirm upkeep and adequate maintenance
- Discharge locations for signs of illicit discharge



Documentation & Follow-Up:

- Closeout inspection meeting
 - ☐ Identify any issues, violations, follow-up items
- Submit inspection report to correct personnel
- Record inspection notes, photos, documents for future inspection(s)





THANK YOU

QUESTIONS?

