Stormwater Pollution Prevention Compliance



Automotive Workshop

District Department of the Environment February 2012



Stormwater Pollution Prevention Why address stormwater, why it's a problem?

• Water pollution begins on the land surface – so that's where the focus is best targeted: *preventing pollution in the first place*.

• A Stormwater pollution prevention plan is much more than just a paper plan – it's a living, firm commitment to clean up everyday practices at each facility/shop.

• Pollution prevention is just that: <u>preventing pollution</u> from reaching the exposed elements (rainwater runoff) in the first place...so it never reaches the Potomac, Anacostia Rivers or Rock Creek.



BaySaver [stormwater device] in need of service – filled with debris and motor oil, where should be only rainwater. If you have an oil/water devise, make sure to get regular maintenance...don't let your stormwater device get like this.

What are Stormwater Pollution Prevention (P2) Plans?

Definition: Pollution Prevention is the use of materials, processes, green procurement, and/or practices that reduce or eliminate the creation of pollutants or wastes at the source.

P2 IS A LEGAL REQUIREMENT of our DC stormwater Permit (and legal requirements of many other federal laws: Clean Water Act, RCRA, Superfund, TSCA, Clean Air Act, etc.)

And,

There should be clean practices used every day, routinely at every auto shop – <u>CLEAN</u> SHOULD BE THE NORM. USEPA is paying attention, you could get audited at any time.

Each shop should be using aggressive and practical pollution prevention methods ('good housekeeping') all along – to address all potential pollutant sources, measures, controls at each facility. Illicit discharges are covered under many federal laws, **but P2 is common sense!**



What NOT to do - employee hosing debris into a stormdrain near the Anacostia River

Objectives of a Plan

A Stormwater Pollution Prevention Plan (SWPPP) is to meant to achieve 3 primary objectives:

- <u>Assure compliance</u> with the DC MS4 Stormwater Permit (USEPA conducts unannounced audits at any time – they *can* levy fines); and, DDOE conducts routine maintenance & operation inspections.
- <u>Identify potential sources of pollution</u> associated with the activities at a facility which may affect the quality of stormwater discharges; make a list of pollutants at your facility.
- Describe & <u>have commitments</u> from shop managers to adopt/teach daily Best Management Practices (BMPs) & good housekeeping measures for each facility.



What NOT to do. A maintenance yard – open barrels exposed to the elements; open containers are not allowed, they must be covered.

About Secondary Containment

- Secondary Spill Containment is used for the containment of liquids preventing contamination or any pollution occurring. The use of a spill berm liner for containment of fuel tank leaks, oil spill cleanup, truck wheel washing, HAZMAT chemical spill response and decon pool showers for clean animals, birds or people.
- Use secondary spill containment BMPs like berms and liners, which are used in the oil and gas industry, first responders for decontamination of equipment from truck roll overs and spills and containment of chemical spills in auto shops or similar work sites. They are portable, flexible and a cost effective solution for pollution control.
- http://www.epa.gov/oust/fedlaws/secondco.htm



a stormwater structure -- not maintained since 2008 (in really bad shape); don't let your property end up like this!



another facility: poor housekeeping – shop grounds should NOT look like *this*.



What NOT to do: Do not sweep or hose oily debris into *any* storm drains. Sweep it up and put it into a canister or drum for disposal.

Please do NOT do this... most stormdrains

11 - Sizes:

receive no treatment & go directly to rivers.

Who Does What?

- Each facility should begin with an inventory of their waste materials, prioritized based on potential to pollute. Make a list.
- Each facility should develop a draft (then final) Plan for approval by DDOE. Just use common sense. Clean facilities mean cost savings.
- Each plan outlines the details of how you will handle/manage waste and pollutants: motor oil, anti-freeze, petroleum, solvents, spills, etc.
- Each facility should begin with a comprehensive audit, then schedule routine inspections, prepare an annual report on findings of the inspections; DDOE can work with you on areas that need improvement...we'll visit your shop and offer input, ideas for improvement.
- Pollution Prevention Plans are basically a commitment (by facility managers) to adopt Good Housekeeping Practices and best management practices in/around each facility.



maintenance facility parking lot with leaking oil. No excuse for this; use spill pads and drip pans for known leaky vehicles parked outside while awaiting repair.



Components of a SW Pollution Prevention Plan

- Basic Facility info, including location of stormdrains.
- Inventory of Pollutant Sources
- Record of Leaks and Spills
- Non-Storm Water Discharges
- Best Management Practices
- Reporting & Recordkeeping
- Good Housekeeping Measures
- Primary Responsible Contact
- 'In Case of Emergency Spill' call sheet...post it and use it!



What NOT to do: collected debris from catch-basin cleaning, should not be exposed to rainwater, needs to be managed and/or covered or put into barrels w/lids.

What else we need to know...

• DDOE has held 2 trainings (for City agencies) to date highlighting good housekeeping practices, guidance, and assistance available from DDOE. More trainings are being scheduled, you can take part.

• The City is only as clean as its automotive facilities. How your shop functions *directly* impacts the water and the Anacostia River or Rock Creek. Title 21 of DCMR §534.2 applies.

• Call DDOE to request an inspection, to help target your resources & identify the worst, most immediate problems. We can help with ideas & plans.

• We can all operate a lot cleaner! Please ACT now, don't wait for a plan.

Whom to Call for spills?

- District Department of the Environment (202) 535-2600
- U.S. Environmental Protection Agency (215) 597-9898
- DC Fire and Rescue (202) 673-3331, or 911.
- Spills of More Than 50 Gallons- Homeland Security and Emergency Management Agency (202) 727-6161 or National Response Center – (800) 424-8802 Coast Guard
- Report pollution or questionable discharges to storm drains or waterways:
 - DDOE Water Quality Division (202) 535-2645
 - DC Water (202) 612-3400
- Leaking sewer lines or water mains:

– DC Water – (202) 612-3400

- Report illegal dumping of solid waste:
 - Citywide Call Center 311



We're Ready to Help

DDOE contact: Diane M. Davis Pollution Prevention Coordinator diane.davis2@dc.gov 202-741-0847