Industrial Inspection Program
Texas MSGP

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Texas Stormwater Conference
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Resource Protection & Compliance Department

Municipal Separate Storm Sewer System Programs (MS4)
San Antonio Water System

- SAWS – City owned utility
- Water, Wastewater, Steam & Chilled water
- 1.8 million people (7th largest city)
- 460,000+ customers
- 12,000 miles of water & sanitary sewers mains
- 3 Large Water Recycling Centers
- Largest direct recycle water system with over 130 miles of lines
  - (Dos Rios, Leon Creek, Medio Creek WRC process 120 MGD)
Storm Water Permit Requirements

Texas Commission on Environmental Quality – WQ0004284000

• Issued to City of San Antonio, San Antonio Water System and Texas Department of Transportation
Phase I MS4 Permit

Requirements of the co-permittees

• 465 Square miles

1. Structural Controls
2. Areas of New development & significant redevelopment
3. Roadways
4. Flood Control Projects
5. Pesticide, Herbicide, and Fertilizer Application
6. Illicit Discharges and Improper Disposal
7. Spill prevention and Response
8. Industrial & High Risk Runoff
9. Construction Site Runoff
10. Public Education
11. Monitoring and Screening Programs
SAWS MS4 Compliance Programs

• Illicit Discharge Detection Program
• Industrial & High Risk Runoff Program
• Sampling & Monitoring Programs
• Construction Site Runoff Program
• Spill Response Technical Assistance
• Youth Public Education Program
• Overflows and Infiltration Program
Industrial Inspections 101

Implementation of MS4 permit requirements

• MS4 Permit requirements
• Storm Water Management Plan
• Industrial & High Risk Runoff
  – Identify & control pollutants in Stormwater discharges
    • From municipal operations (e.g. municipal landfills, municipal Treatment Storage Disposal (TSD), hazardous waste & recovery), other commercial and industrial discharges contributing substantial pollutant loading to the MS4.
Storm Water Management Program

Industrial & High Risk Runoff

• Priorities and procedures for inspections and establishing and implementing control measure for such discharges.
• An industrial and high risk program to include monitoring and screening of pollutants of concern for facilities.
• A list of all industrial storm water discharging into the MS4, maintain and update as necessary.
Storm Water Management Plan

Industrial & High Risk Runoff

• General description of inspection program
• Funding requirements / sources
• Personnel / Resources
• Tasks & Program Requirements
• Performance Measures
• Public involvement?
Program Funding

Utility Fee

• San Antonio established a “Drainage Utility”.
• Dedicated fee
• Based fee + impervious cover
• Provisions for appealing
• Web site also has an interactive map allowing customers to calculate their impervious cover / bill
• Collected by SAWS on water bill as a separate line item
• [https://www.sanantonio.gov/TCI/Projects/Storm-Water-Fee](https://www.sanantonio.gov/TCI/Projects/Storm-Water-Fee)
Industrial Inspection Program

Multimedia Inspections or “doing more with less”

• Education and Communication staff
• Incorporate within other programs
  – Pretreatment program
  – Wastewater Sampling
  – Code Compliance
  – Operations & Maintenance
Multi-Sector General Permit (MSGP)

Am I regulated?

If you discharge storm water associated with an industrial activity into a storm water conveyance that is part of a municipal separate storm water sewer system (MS4) or to surface water in the state; and your business activity fits into one (or more) of the regulated industrial sectors.
NAICS/SIC Codes

Standard Industrial Classification (SIC) Code

- Several digit code created by U.S. Office of Management & Budget (OMB)
- Describes an industrial activity that takes place at a facility
- Grouped into 30 Industrial Sectors (A – AD)
  - List of 523 Primary SIC Codes and 4 other narrative Industrial Activity Codes in MSGP that must have authorization for stormwater discharge
  - Some code are covered automatically without a permit application (NOI)
NAICS/SIC Codes

North American Industry Classification System (NAICS)

- Developed jointly with Canada and Mexico under the auspices of the U.S. Office of Management & Budget (OMB)
  - Adopted in 1997 to replace the SIC Code system
  - Allows for high-level comparability in business statistics among North American Countries

- 6-digit codes, 20 sectors
  - First 2 digits = sector
  - 3rd digit = subsector
  - 4th digit = industry group
  - 5th digit = NAICS industry
  - 6th digit = national industry
TEXAS SALES TAX CERTIFICATE

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Determining how big your world of responsibility is.

Identification of facilities

- Manufactures guide
- Database search
- Certificates of Occupancy
- Water accounts
- Secretary of State web site
Industrial Inspection Program

- Storm Water Industrial & High Risk Facility Monitoring
- Inspection Processes for Multi-Sector General Permit

- Is the facility a Salvage yard? Require facility to Submit SW Appendix A issue "conditional" compliance
- Corrective action notice (CAR) 30–45 day follow-up
- Issue Notice of Violation (NOV) to Facility - 7 day response required. Include a Public Meeting date at SAWS.
- Refer violation to TCEQ for enforcement Letter from ICS Supervisor with copy of NOV and case file
- Legal Action: file affidavit with Municipal Court
- Conduct follow up Site Visit to confirm compliance.
- Issue compliance notification “COM”
- Enter compliance information into SW and CO Industrial files
- Schedule next Annual Inspection

- Current TPDES Permit
- Compliant SW, Implementing BMPs or No Exposure Requirements
- Facility visit Contact made? Closed
- Facility Inspection Schedule next Annual Inspection...
Four Major Key Elements to a Successful Industrial Storm Water Inspection

- Introduction
- Documentation Review
- Site Assessment
- Exit Interview
Storm Water Pollution Prevention Plan (SWP3) & Site Assessment

- Minimum requirements
- Pollution Prevention Team
- Non-Stormwater discharges
- Inventory of exposed significant materials
- Site map
- Spills & leaks
- Outside Processing areas
Performance Measures

- Annual Comprehensive Site Evaluation
- Narrative summary of changes made to the BMPs if the benchmark levels were exceeded.

- Site evaluation
- Annual Numeric effluent limitations testing for Hazardous Metals
- Benchmark testing
- Quarterly Visual Monitoring
- Sampling DMRs
- Summary of benchmark testing and BMP changes
Collaboration

Public Involvement

• Find a group that represents the regulated community.

• Manufacturing community
  – Use it as a tool to educate and regulate.
  – Buy in from those that want to make water quality improvements.
  – Use it as a tool to make incremental changes.

San Antonio Manufacturers Association – SAMA
San Antonio Restaurant Association - SARA
Ordinances

Chapter 34 Article VI, Division 5, Subdivision C

- 34-751 – MSGP required
- 34-752 Conditional No Exposure Certification
- 34-753 SWPPP Requirements
- 34-754 Inspection and Entry
- 34-755 Falsifying Information
- 34-756 Enforcement and Penalties

- www.Municode.com
Business License – Chapter 16

Annual Renewal Article Vii

• Used Automotive Parts Recyclers & Metal Recycling

(d) The application must include:

(1) A copy of the national pollutant discharge elimination system discharge permit or notice of coverage for that location if required;

(2) A copy of the approved Texas Commission on Environmental Quality (TCEQ) storm water multi-sector permit for that location;

(3) A San Antonio Water System (SAWS) letter of compliance regarding compliance with the Texas Pollutant Discharge Elimination System for that location dated within the last fifteen (15) months; and

(4) A copy of the State of Texas registration as a used automotive parts recycler.
Narrative BMP

Water Quality

• Self-monitoring of facilities
• Benchmarks
• Exceedances addressed in SWPPP
• Narrative updated to reflect any issues with exceedance in sampling.
Summary

• Ordinances
• Inspection Programs
• Interaction with the public
• Improving Water Quality
Industrial Inspection Program
Texas MSGP

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