

US EPA ARCHIVE DOCUMENT

**ENGINEERING, SURVEYING &
PERMIT SERVICES DEPARTMENT**
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DEVELOPMENT SERVICES AGENCY

Engineering, Surveying and Permit Services Department
Planning and Community Development Department
Roads Department

June 10, 2013

United States Environmental Protection Agency
Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901
Attn.: Kathleen H. Johnson

**Subject: Municipal Separate Storm Sewer System (MS4)
Compliance Inspection**

Dear Ms. Johnson:

The County is in receipt of your report dated May 1, 2013, regarding the results of the inspection conducted on August 28, 2012, to assess the County's compliance with Storm Water Permit, NPDES No. CA00883399. I would like to clarify a few comments made in the report, and also provide an update on program elements or other items the county has implemented since our inspection last August. Responses or clarifications are provided in the same order as your letter.

SECTION 2.0 - KERN COUNTY STORMWATER PROGRAM

The last paragraph contains some statements that are incorrect or warrant clarification.

"However, peak storm flow captured in the basins is occasionally discharged to waters of the United States."

It would be incorrect to say the peak flow captured in the basins is occasionally discharged to the water of the United States. Our Development Standards require the basin to have capacity to store a 10-year, 5-day storm event. They are not designed to capture the peak flow and divert it to a canal or river. Within the MS4 area, the county maintains approximately 212 storm water basins. Of these, only four convey (directly and/or indirectly) storm water to a water of the United States (Kern River). Of the four, only one directs storm water, via pumps, to the Kern River, but even with the severe winter storms in 2010, the basin had enough capacity and the pumps did not turn on.

"County staff noted that some basins overflow to other basins during major rain events."

Within the county MS4 there are no basins that overflow to other basins during major rain events. The MS4 system is not designed in that manner. On a few occasions a basin has

been pumped using a vacuum truck and the storm water hauled to a nearby basin.

“Also, sediment buildup, sometimes due to deferred or inadequate maintenance, can prevent basins from infiltrating as designed. As a result, basins may be drained or pumped into canals during peak storms to prevent flooding.”

According to ESPS' records and staff's knowledge, no basins within the MS4 have ever been drained or pumped into a canal or river during peak storms to prevent flooding. Perhaps this is a method used by the City of Bakersfield, but not the county. As stated above, we have on occasion utilized a vacuum truck to remove storm water from a “flooded” basin, but we take that storm water to a nearby county basin that has not been significantly affected by the major rain event, and has capacity to receive additional storm water.

SECTION 3.0 – EVALUATION FINDINGS

3.1 Program Management

3.1.1 – Copermitttee Coordination and SWMP Revision

The county will collaborate with the city and revise the 2001 SWMP in response to changed conditions and also incorporate more effective approaches to pollutant control.

Recommendation for Program Improvement – Develop steering committee with the County, as well as between the City and County.

The County will establish a steering committee consisting of ESPS, Roads, Environmental Health Services, Waste Management, Sheriff, and Fire Departments to better implement the MS4 program. Though the various departments currently communicate with each other on an as-needed basis, a general meeting once or twice a year should help to remind the various departments of the permit requirements and provide current and accurate contact information. We will also attempt to coordinate a similar meeting with City staff, perhaps annually.

3.1.2 – GIS Database

Recommendation for Program Improvement – Continue developing the County's geographic information system (GIS)

The county has been working on a GIS layer to identify stormdrain locations, inlets, sumps, etc. and will continue to do so. It is anticipated this layer will be completed within the next year, and will continuously be updated as more drainage facilities are installed.

3.2 – Illicit Discharge Controls

3.2.1 – Illicit Discharge Controls – Public Outreach and Education

Potential Permit Violation – The County failed to facilitate public reporting of IC/IDs by developing a flyer and reporting phone number as required by Permit Provision D.26 and SWMP Part 9, Section 1.

This was an oversight on our part. We have recently developed a flyer that includes a

reporting phone number and email address (Exhibit A). These flyers are now available at our public counter along with our other public handouts, and we will also make them available in the Building Inspection Division's outlying offices, even though they are outside the MS4 area. Staff will also develop a tracking sheet to document any reported IC/IDs and include any follow-up actions taken.

Recommendation for Program Improvement – Develop hotline or website for the general public to report IC/ID complaints.

We have identified a telephone number, email address and included a link on our web site to facilitate public reporting of IC/ID complaints (Exhibit A). The number is the department's receptionist so a caller can speak directly to a staff member during normal working hours, or leave a message after-hours. Reports of IC/IDs will be logged to a detailed spread sheet, investigated, documented, and added to our future storm drain GIS layer to potentially identify hot spots and problem areas, and also assist in identifying illicit dischargers. (<http://esps.kerndsa.com/images/engineering/pdfs/KernCountyIDDEflyer2.pdf>)

Potential Permit Violation – The County had not fully implemented a storm drain stenciling program as required by Permit Provision D.26 and SWMP Part 9, Section 4.

Per our permit there are a total of 19 drainage areas within the county/city MS4. During the summer of 1996 the county and city recruited the Boy Scouts of America to stencil storm drain inlets as part of our joint Storm Drain Stenciling Program. A total of 286 storm drain inlets were stenciled. The stenciling was conducted in 12 of the 19 drainage areas. From our records this appears to be the only year stenciling was performed and to date the stenciling is no longer visible. We intended to reinstate our stenciling program several years ago, but County Counsel advised us that using (uninsured) volunteers posed a liability risk, and our staffing levels did not allow us to get much done. We will revisit the concept with county counsel again. We will prioritize the more sensitive storm drains in the MS4 and proceed with others as time and resources allow. We will also document the stencil locations on our GIS as it develops.

Instead of conducting additional stenciling for our program, we may decide to purchase specially made aluminum discs that are about 4 inches in diameter and use adhesive to attach them at the drain inlets. The discs are more permanent than paint and can be easily placed by ESPS personnel or Work Release Program participants. This is an example of the aluminum disc:



3.2.2 – Illicit Discharge Controls – Monitoring and Enforcement

Recommendation for Program Improvement – The County should become more involved with screening and analysis of its outfalls.

Staff will become more involved in dry-weather screening and analysis and will inspect all county outfalls at least once during the dry season.

Program Deficiency – The County failed to use its authority or take follow-up action for dry weather flows as required by Permit Provisions D.2, D.8, D.23 and SWMP Part11.

We will provide better documentation in our annual report of any investigation taken to determine the source of dry-weather flows. For the two instances you describe from our 2010-2011 Annual Report, we followed the discharge upstream and observed runoff from sprinklers from numerous properties. Therefore, we felt our response was adequate, but we will document this better in the future.

Program Deficiency – The County lacked formal enforcement protocols for addressing illicit discharges as required by Permit Provisions D.2, D.8, D.23 and SWMP Part11.

The County has a very well defined enforcement process through our Code Compliance Division and Chapter 8.44 of Title 8 of the Kern County Ordinance Code.

When a report of an IC/ID is received, staff from our Drainage Division performs the initial investigation. If it is determined that an IC/ID did in fact occur, Drainage staff immediately attempts to contact the property owner and requests they remove or discontinue the IC/ID immediately and clean up as necessary. If the owner refuses or is not available, it is turned over to our Code Compliance Division to proceed with a Notice of Violation and proceed with abatement, administrative penalties, etc. We will prepare a brief SOP or an ERP to document this procedure.

Recommendation for Program Improvement – The County and City should establish legal authority where storm sewer lines are interconnected between City and County boundaries.

The City and County are copermittees, and as such, cooperate well together on all aspects of our permit. We will attempt to establish clarifying language regarding each agency's role in this circumstance and include in the next revision of our agreement. Our unwritten policy is to jointly attempt to identify an illicit discharger, and the enforcement actions would be carried out by the jurisdiction in which the discharger is located. There are numerous areas where city and county drainage facilities intermingle, and will continue to do so due to City annexations and future developments.

3.3 Construction Site Planning Procedures

3.3.1 – Training

Program Deficiency – The County has not prepared a summary report of educational and training activities made available as a resource for private construction operators as required by Permit Provisions D.22, D.26 and SWMP Part16.

We will prepare a summary report. We have provided limited training for private

construction operators and distributed a guidance document titled Stormwater Drainage and Erosion Control During Construction (Exhibit B). This was also presented and discussed with the local Home Builders Association (HBA) for comment and input.

Program Deficiency – The County could not demonstrate that it conducted stormwater awareness training for County staff as required by Permit Provisions D.11 and SWMP Part 13.

Attached is a sign-in sheet of training conducted in July, 2012 (Exhibit C). Though it says “Green Code” it was actually training for all the building inspectors on soil erosion and stormwater retention. It was associated with the letter that was sent out to contractors mentioned above. Our trainings are also on a live video feed to our outlying offices so all the inspectors were involved, and not all are shown on the sign-in sheet. In addition, several staff have been to QSP/QSD training and the Roads Department initiated a program in March, 2013 for their staff to be trained and certified. However, we will incorporate stormwater training into our regular training schedule and document each training session.

3.3.2 – Plan Check and Review

Recommendation for Program Improvement – Formalize site plan review procedures for private and County-sponsored construction projects greater than one acre (except for Roads Department projects).

The County requests clarification as to what EPA is specifically recommending? As explained during our inspection, we DO use a checklist for each review and the plan checker does not approve any site plan until all items on the list are satisfied. The approval stamp on the plans is confirmation that all items were satisfied. Copies of the check list were previously provided. If the recommendation is to provide better documentation, please clarify.

3.3.3 – Construction Site Inspections

Program Deficiency – The County has not implemented a stormwater inspection checklist for construction site inspections as required by Permit Provisions D.10.

On February 7, 2002, this department sent to the California Regional Water Control Board—Central Valley for their review and approval a proposed template storm water inspection checklists for both construction projects and industrial facilities. We found no response or approval from the RWQCB in our files, thus they were never implemented. We have attached the same construction inspection checklist, and if acceptable, we will include as part of the SWMP revision (Exhibit D). The reference to 5 (five) acres will be revised to reflect 1 (one) acre.

Program Deficiency – The County lacked formal procedures for inspecting County-sponsored and private construction sites as required by Permit Provisions D.8 and D.21.

We will prepare and implement a formal SOP describing specific protocols for inspections. The SOP will identify priority areas, inspection details, and inspection frequencies.

Potential Permit Violation – The County failed to use its authorities to ensure compliance

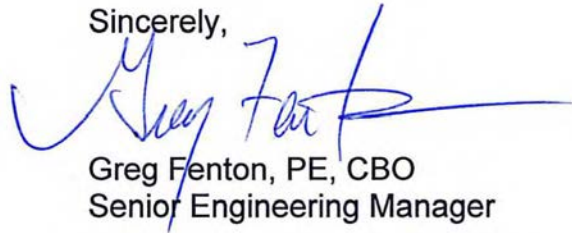
with construction NPDES permits as required by Permit Provisions D.8, D.21 and D.22 and SWMP Part 15.

County staff will attempt to maintain adequate slope stabilization prior to removing wattles and other BMPs. As indicated during your inspection, the sandbags were removed from the drop inlet for safety reasons, as this was a new undercrossing that the travelling public was not familiar with. There are always safety concerns with items in the vehicle lanes, particularly at newly constructed areas. Subsequent to the inspection, the slopes were stabilized with a mulch blanket.

As previously indicated, there are only 4 (four) drainage basins in the County portion of the MS4 that are capable of draining directly or indirectly to a Water of the US (Kern River). All of our drainage basins receive regular inspections and maintenance, and most of them receive a major renovation every 3-5 years. This renovation includes removal of all weeds and debris, and depending on the basin, may have the bottom few inches of sediment and silt removed and disposed of.

Please feel free to call if you have any questions or would like to discuss this further.

Sincerely,



Greg Fenton, PE, CBO
Senior Engineering Manager

GF:gf
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cc: Roads
Chairman Mike Maggard



County of Kern

Illicit Discharge Detection and Elimination Program (IDDE)

“Only Rain in the Drain”

The county’s storm drain system (MS4) consists of curb, gutters, drain inlets, piping, and channels which convey storm water to drainage basins, canals and the Kern River. **It is illegal to discharge anything other than storm water into the county’s MS4 system.** However there are a few exceptions to what you can safely and legally discharge into a storm drain other than storm water unless it is determined to be a significant source of pollutants. Those exceptions are:

- Water Line Flushing*
- Lawn and Landscape Irrigation Runoff
- Uncontaminated Pumped Groundwater*
- Discharges from Potable Water Sources*
- Foundation/Footing Drainage
- Air Conditioning Condensate
- Water from Crawl Space Pumps
- Individual Residential Car Wash Water
- Flows from Emergency Fire Fighting Activities
- Diverted Stream Flows*

*Please contact the Department at the number below for review and approval prior to any discharge.

The MS4 is designed to protect you and enhance water resources, but the system can be abused by careless disposal of harmful chemicals, wash waters, and other substances. Common examples of illegal discharges include:

- Pesticides/herbicides
- Washing machine water
- Septic tank/sewer wastewater
- Automotive fluids (used motor oil & anti-freeze)
- Paint
- Pet waste
- Lawn clippings/leaves
- Sediment/soil
- Food wastes
- Construction materials and wastes (concrete)
- Chlorinated swimming pools and/or spas

Remember:
Clean Water Starts With You

REPORT ILLICIT DISCHARGES

If you see or suspect an illicit discharge/connection please notify the County of Kern—Engineering, Surveying and Permit Services Department by calling (661) 862-5100 or send an e-mail to esps@co.kern.ca.us.

**BUILDING INSPECTION DIVISION
ENGINEERING, SURVEYING AND
PERMIT SERVICES DEPARTMENT**

CHARLES LACKEY, P.E., DIRECTOR

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DEVELOPMENT SERVICES AGENCY

Engineering, Surveying and Permit Services Department
Planning and Community Development Department
Roads Department

July 17, 2012

Dear Builders, Contractors and Developers:

Subject: Storm Water Drainage and Erosion Control During Construction

It has come to the attention of this Department that certain methods used by some contractors to manage storm water drainage, prevent erosion and retain soil on site during construction are not working effectively to maintain compliance with the California Green Building Standards Code, the County's National Pollutant Discharge Elimination System (NPDES) permit and Stormwater Ordinance, and other regulations. In lieu of this Department dictating specific methods to address this problem, it is proposed that each project be specifically handled by those owners, contractors and workers involved in the project as they see fit. The purpose of this correspondence is to inform the development community that what we have recently observed in the field is NOT adequately mitigating storm water drainage and, more specifically, erosion and soil runoff. This department intends to increase enforcement practices in these regards, as there is concern that if we do not, the State will intercede.

It is important to understand that storm water drainage and erosion control is not solely a "Green Code" issue. In addition to the 2010 California Green Building Standards Code, storm water drainage and erosion control is also addressed in the County's Grading Code, the County's Stormwater Ordinance, and the requirements of our NPDES permit. Relevant sections of these local regulations are attached.

Erosion control has been an on-going problem that has not been aggressively enforced by this department in the past. However, lack of erosion control also results in track-out of soils and sediments onto adjacent streets. These sediments are then being transported to drainage facilities, which lead to poor drainage performance, increased maintenance cost, and potential groundwater contamination. Such violations could lead to enforcement actions and possible citations by State and Federal agencies. Recent increase in oversight by State and Federal agencies warrants the County to increase enforcement efforts in this area. The County, property owners and developers can face significant penalties for even relatively minor violations.

There are two primary issues to be addressed during construction: 1) storm water drainage, and 2) erosion and soil runoff.

Storm water drainage must be dealt with in one of two ways. Either all storm water shall be retained on site by means of berms or a depressed area OR, if storm water is allowed to flow off site to a drainage system, such as the gutter, street, drainage channel/ditch, stream or other drainage feature, it must be filtered to prevent sediment transport by use of a barrier system. Straw wattles or other filter materials are typically being installed to accomplish this.

Erosion and soil runoff is more of a challenge, particularly as a result of vehicles leaving the site and tracking out sediment onto the roadway, which ends up in the gutter/storm drain system or other drainage device. Some of the methods we have observed in the field include rumble strips

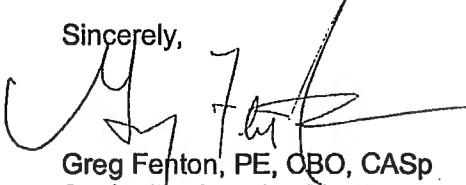
or a rock base to promote tire cleaning before leaving the site, manually sweeping the site on a routine basis, and limited or prohibited vehicle access on the site. We have been told by some that "I don't let anybody on the site," and while this may be true for the most part, we realize that there will still be vehicles accessing the site occasionally for material deliveries, concrete trucks, fork lifts loading roofing materials, etc. We are aware that the county mandating a rock bed has had negative implications, and this will no longer be a mandate, but simply an option. Whatever method is selected, it must effectively keep sediment off of the road and out of the storm drain system at all times. If rock is installed and there is still sediment in the road/gutter, it must be cleaned up immediately.

To allow adequate time to comply, **beginning August 1, 2012**, Building Inspection staff will be more closely reviewing all commercial and residential projects for compliance with the storm water drainage and erosion and soil runoff provisions. In addition, staff from the grading/drainage division will also periodically inspect construction sites for compliance. Sediment runoff, including vehicle track-out, must be effectively mitigated at all times. Many projects are in-fill projects adjacent to occupied buildings that generate nuisance water from lawn irrigation, car washing, etc. Even this nuisance water is enough to transport sediment into the storm drain system. As such, it is necessary to minimize erosion and track-out at all times.

In accordance with Section 17.04.200 of Title 17 (Kern County Code of Building Regulations), violations are subject to a minimum fine of \$100 for the first violation, and up to \$1,000 per day. Additional fines and other enforcement actions will be imposed if the violations continue. The drainage, erosion and track-out provisions are to be enforced at all times, and are subject to inspection at any time, not just during a called inspection. In addition, building inspections may not be made on properties that are in violation of any county ordinance and you will be required to correct the violation and pay all fines prior to scheduling any subsequent inspections.

Again, the County will no longer prescribe specific methods to achieve these objectives, and the individual methods to achieve and maintain full compliance will be the responsibility of the owner, or person in charge of the project. Plans submitted for review shall include a statement that says "All storm water drainage and soil erosion/track-out during construction shall be mitigated" with proposed mitigation methods identified on the plans (rock bed, routine sweeping, etc). Storm water mitigation shall be identified on the site plan by showing wattle/filter locations or a depressed area to retain storm water on site. If you have any questions or would like to discuss this in more detail, please do not hesitate to call me.

Sincerely,



Greg Fenton, PE, OBO, CASp
Senior Engineering Manager

GF:gf
cc: BID/Grading Section
Attachment

H:\BID\LETTERS\erosion control.doc

Kern County Grading Code (Title 17 - Chapter 17.28)

17.28.140 Erosion control.

A. Slopes. The faces of cut and fill slopes shall be prepared and maintained to control against erosion. This control may consist of effective planting. The protection for the slopes shall be installed as soon as practicable and prior to calling for final approval. Where cut slopes are not subject to erosion due to the erosion-resistant character of the materials, such protection may be omitted.

B. Other Devices. Where necessary, check dams, cribbing, riprap or other devices or methods shall be employed to control erosion and provide safety.

C. Temporary Devices. Temporary drainage and erosion control shall be provided as needed at the end of each work day during grading operations, such that existing drainage channels would not be blocked. Dust control shall be applied to all graded areas and materials and shall consist of applying water or another approved dust palliative for the alleviation or prevention of dust nuisance. **Deposition of rocks, earth materials or debris onto adjacent property, public roads or drainage channels shall not be allowed.**

Kern County Stormwater Ordinance (Title 14 – Chapter 14.26)

14.26.250 - Illicit discharges into stormwater system prohibited.

It is unlawful for any person to throw, dump, empty or in any way cause sanitary wastewater, rubbish, refuse, litter, accidental spill discharges, garbage of any kind whatsoever, or any unsanitary or deleterious matter including, but not limited to, petroleum products, pesticides, herbicides, controlled substances, hazardous materials, or any substance other than stormwater to be introduced into any stormwater system or conveyance that discharges into a stormwater system.

2010 California Green Building Standards Code (Residential Mandatory Measures)

4.106.2 Storm water drainage and retention during construction. Projects which disturb less than one acre of soil and are not part of a larger common plan of development which in total disturbs one acre or more, shall manage storm water drainage during construction. In order to manage storm water drainage during construction, one or more of the following measures shall be implemented to prevent flooding of adjacent property, prevent erosion and retain soil runoff on the site.

1. Retention basins of sufficient size shall be utilized to retain storm water on the site.
2. Where storm water is conveyed to a public drainage system, collection point, gutter or similar disposal method, water shall be filtered by use of a barrier system, wattle or other method approved by the enforcing agency.
3. Compliance with a lawfully enacted storm water management ordinance.

Greg Fenton
Green Code

Date 7/19/12

Training

[Signature] #30

[Signature] (32)

BRIAN WRIGHT #45

Kal O'Angelo #44

[Signature] #29

Charles Arbust

Jack McDonald #7

[Signature] #19

ENGINEERING & SURVEY SERVICES

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RESOURCE MANAGEMENT AGENCY

DAVID PRICE III, RMA DIRECTOR

Community Development Program Department
Engineering & Survey Services Department
Environmental Health Services Department
Planning Department
Roads Department

February 7, 2002

California Regional Water Quality Control Board
3614 East Ashlan Avenue
Fresno, CA 93726
Attn.: Mr. Douglas Patteson

Dear Mr. Patteson:

**Subject: Order No. 5-01-130, Provision 10-Storm Water Inspection Checklist
Submittal, County of Kern and City of Bakersfield Municipal Permit**

In response to your letter dated January 8, 2002, enclosed for your review are the County of Kern and City of Bakersfield proposed template storm water inspection checklists that describes guidance for conducting inspections of both industrial facilities and construction projects.

Please contact me at (661) 862-5069 if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Chung".

Dan Chung
Drainage Section.

Attachments

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Grading Inspection Check List Template NPDES Permit Requirements

The following items will be added to our grading inspection check lists and/or forms. These items, at minimum, will be documented for each applicable site inspection in accordance with our NPDES permit requirements.

Yes No
 Grading involves 5 acres or more (If yes, please continue)

Site run-off directed to: On-site retention basin Regional retention basin Canal River
 Other _____

- Yes No
 Site egress/access is at designated locations and excessive track-out is mitigated
- Erosion control measures appear to be adequately installed (October 1st - May 1st)
- Sediment control measures appear to be adequate (straw bales, silt fences, etc.)
- Storm drain inlets appear to be adequately protected
- Overall site housekeeping appears adequate

Recommended corrective actions/comments: (Required for all "no" responses):

Inspectors will use the detailed inspection guide (see attached) as a reference when conducting inspections. The guide will also be distributed to the grading permit applicant for educational purposes.

Inspector

Date

Grading Inspection Guidance

Site Egress/Access Track-Out	Yes	No	N/A
Is there a maintained, stabilized, designated area for site access and egress to minimize vehicle track-out of sediments?			
If site access locations include tire and wheel washing, is water directed away from street and storm drains?			
Is there any evidence of significant sediment, debris, or mud on public roads at intersections with site access roads?			
Are affected streets periodically swept to remove excess stones and sediments?			
Erosion Control	Yes	No	N/A
If present, are all exposed slopes protected from erosion through implementation of soil stabilization BMPs?			
Do the implemented BMPs appear to be effective in controlling erosion and sediment discharges?			
Sediment Control	Yes	No	N/A
Have sediment basins been installed to prevent off-site discharge of sediments during construction? (Oct. 1, - Apr. 31)			
Are all sediment barriers (e.g., sandbags, straw bales, and silt fences) in place where necessary?			
Are they effective in controlling sediment discharges?			
Storm Drain Inlets			
Are BMPs in place to filter runoff prior to reaching storm drain inlets?			
Do any storm water drainage facilities require repair or clean out to maintain adequate function?			
Are locations of temporary soil stockpiles or construction materials in designated areas away from drain inlets?			
Facility Housekeeping/Material Storage	Yes	No	N/A
Are all material handling and storage areas reasonably clean and free of spills, leaks, or other potential pollutants?			
Are all vehicle and equipment storage and maintenance areas reasonably clean and free of spills, leaks, or other potential pollutants?			
Are materials and wastes, which could potentially contaminate runoff, properly covered?			
Are there any visible non-storm water discharges (e.g., concrete washout, paint rinsate, etc.) which could potentially contaminate runoff?			
Is there evidence that non-storm water discharges occurred in the past?			

Industrial and Commercial Facilities-Inspection Check List Template NPDES Permit Requirements

The following items will be added to our industrial/commercial inspection check lists and/or forms. These items, at minimum, will be documented for each applicable facility inspection in accordance with our NPDES permit requirements.

Stormwater discharges to: On-site retention basin Regional retention basin Canal River
 Other _____

- | Yes | No | |
|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | Non-stormwater discharges present |
| <input type="checkbox"/> | <input type="checkbox"/> | Run-off from outdoor vehicle and equipment wash areas isolated from storm sewer |
| <input type="checkbox"/> | <input type="checkbox"/> | Outdoor vehicle and equipment maintenance BMP's appear adequate |
| <input type="checkbox"/> | <input type="checkbox"/> | Outdoor materials and wastes stored properly |
| <input type="checkbox"/> | <input type="checkbox"/> | Outdoor process areas properly maintained |
| <input type="checkbox"/> | <input type="checkbox"/> | Spill prevention and control measures appear adequate |
| <input type="checkbox"/> | <input type="checkbox"/> | Adjacent storm drain inlets appear clean (no signs of illegal dumping) |
| <input type="checkbox"/> | <input type="checkbox"/> | Overall housekeeping appears adequate |

Recommended corrective actions/comments: _____

Inspectors will use the detailed inspection guide (see attached) as a reference when conducting inspections. The guide will also be distributed to the facility manager for educational purposes.

Inspector

Date

Industrial & Commercial Inspection Guidance

US EPA ARCHIVE DOCUMENT

	Yes	No	N/A
1. Non-Storm Water Discharges Present?			
Are there any apparent illicit connections to the storm drain system from interior floor drains, sinks and sumps			
Are there any apparent outdoor discharges being conveyed to any storm sewer facility?			
Is there any evidence of dry weather flow?			
If yes, can source be identified and is it allowable?			
2. Outdoor Vehicle and Equipment Wash Area			
Is vehicle and equipment washing performed in a designated paved area that discharges to the sanitary sewer system or closed-loop water reclamation system?			
3. Vehicle and Equipment Maintenance BMPs Adequate?			
Is maintenance performed in a designated area that does not impact storm drains, or are storm drains protected if activity could result in discharges to the storm drain?			
Are drip pans placed under vehicles and equipment to catch spills and leaks?			
Is there any evidence of excessive leakage of vehicles or equipment (oil and/or other stains throughout area)?			
4. Outdoor Materials and Wastes Stored Properly?			
Are materials and wastes stored outdoors appropriately contained and/or covered, and in accordance with hazardous materials and waste regulations?			
Are outdoor material and waste storage areas sloped to prevent standing water and storm water run-on?			
Are there any spills accumulating in storage areas?			
Are materials and wastes stored in appropriate containers, with firm lids or covers?			
5. Outdoor Process Areas Maintained?			
Is there any evidence of leaks or wastes generated by outdoor processes exposed to rainfall/runoff?			
Are there any spills accumulating in process areas?			
6. Spill Prevention and Control Measures Adequate?			
Are spill kits (with appropriate materials) located in or near appropriate locations including but not limited to: indoor manufacturing areas, vehicle/equipment fueling areas, vehicle/equipment maintenance areas, above and under ground storage tanks, loading docks?			
Is a Spill Prevention Control and Countermeasures Plan on file (required for storage of oil and certain hazardous materials)?			

Do Aboveground Storage Tanks and other outdoor storage areas containing liquids have secondary containment?			
Are spent spill clean-up materials containing hazardous materials, or wet absorbent materials placed in dumpsters designated for municipal waste?			
Are drip pans placed within rails at rail transfer areas?			
Are drip pans or other appropriate containment devices placed under hose connections, hose reels and filler nozzles?			
Are drip pans used when making and breaking connections?			
7. Adjacent Storm Drain Inlets Clean?	Yes	No	N/A
Any signs of illegal dumping in the drain inlets?			
Is litter and/or debris accumulating in areas that could impact storm drains?			
Are storm drains labeled with "No Dumping" signs?			
8. Overall Housekeeping Adequate?	Yes	No	N/A
Is general housekeeping conducted consistently?			