

Chapter 7

INDUSTRIAL FACILITIES PROGRAM

I. Introduction

The City will implement an Industrial Facilities Program in order to reduce the discharge of pollutants from industrial facilities to the storm drain system. Potential sources of pollutants from industries include outdoor activities, manufacturing processes, accidental spills, improperly stored materials, improper waste disposal, and parking lots. Pollutants, such as chemicals and vehicle fluids, may be discharged if adequate precautions are not taken.

The State Water Resources Control Board (SWRCB) and Regional Water Quality Control Board (RWQCB), under the Phase I and Phase II general permit programs, are regulating specific industrial activities that have the potential to discharge pollutants to the storm drain system. The permit program requires 10 types of industries, based on Standard Industrial Classifications [SIC] codes, to file a Notice of Intent (NOI) under the General Industrial Activities Storm Water Permit (General Industrial Permit). These industries are also required to prepare and implement both a storm water pollution prevention plan (SWPPP) and a storm water monitoring program. The Phase II ruling notes that if a non-designated industrial facility is determined to have an adverse impact on water quality, it may be designated for a NPDES permit. With respect to the unregulated industries, Phase II guidelines encourage the control of storm water discharges through implementation of Best Management Practices (BMPs).

The City currently implements an Industrial Waste Discharge Program for all local industries that are classified as “Significant Industrial Users (SIUs).” These industries are permitted, inspected, and monitored for their wastewater discharges to the sanitary sewer. Since 1998, this program has expanded to incorporate education about storm water issues and annual inspections now include a site review for compliance with storm water regulations.

The objectives of the City’s Industrial Facilities Program are to:

- Reduce urban runoff pollution generated by industrial facility operations and activities.
- Ensure that industrial facilities, which are classified by the City as Significant Industrial Users, comply with the City’s Storm Water Ordinance, mandatory BMPs, and Industrial Waste Discharge Permit requirements.
- Ensure that industrial facilities that have filed a NOI with the state are in compliance with the Storm Water ordinance and mandatory BMPs.

II. Pollutants of Concern and Target Audience

There are a variety of pollutants associated with industrial facilities. Certain pollutants of concern are dependent on the type of industry while others can be expected from any type of industrial facility. For example, motor oil and gasoline may leak onto parking lot surfaces; soap and detergents may be discharged into the storm drain system from fleet vehicle or sidewalk washing; landscaping pesticides and fertilizers may runoff if not properly applied; and chemicals and hazardous materials may be spilled or leak into the storm drain system if not properly handled and contained.

The target audiences are industrial facility owners, managers, and employees. Industrial businesses of concern located in the city include manufacturing, assembly, and food production facilities. Since 2004, the number of regulated businesses in Santa Cruz has changed significantly. Currently there are: 1 categorical business, 5 Significant Industrial Users, and 1 dry cleaner (that is still using “perc” (perchloroethylene)). In addition, there are approximately 270 food service facilities and 95 vehicle service facilities which are commercial facilities also regulated by the City (which are discussed in Chapter 8).

III. Program Elements and Best Management Practices

The City determined which elements comprised the Illicit Discharge Detection and Elimination Program and then selected the most appropriate BMPs in order to reduce the pollutants of concern described above to the maximum extent practicable.

The Industrial Facilities Program includes the following elements:

- ❖ Industrial Waste Discharge Program
 - Site Inspections
- ❖ Facilities Regulated Under the State General Industrial Permit
 - List of Facilities
 - Site Inspections at Facilities Filing a NOI
- ❖ Best Management Practices and Checklist
- ❖ Education and Outreach

The program elements are described in more detail in the sections below. The selected BMPs are listed and described under each program element.

Industrial Waste Discharge Program

The City currently has an Industrial Waste Discharge Program that has been in place for many years. The Public Works Department, Environmental Compliance Division, is primarily responsible for implementation of the Industrial Waste Discharge Program. Environmental Compliance Inspectors, under the supervision of the Wastewater Laboratory/Pretreatment

Manager, regularly monitor and conduct inspections of industrial facilities considered “Significant Industrial Users (SIUs).” SIUs are defined as facilities that fall under one or more of the following categories:

- ❖ All industrial users subject to Categorical Pretreatment Standards, or
- ❖ Any other user that has any one or more of the following characteristics:
 - an average discharge flow of equal to or greater than 25,000 gallons per day of process wastewater to the WWTF,
 - contributes a process waste stream which is 5 percent or more of the average dry weather hydraulic or organic capacity of the WWTF,
 - has a reasonable potential to adversely affect WWTF operations, or
 - a violation of any pretreatment standard or requirement (in accordance with 40 CFR 403.8 (f) (6)).

All SIUs are required to have an Industrial Waste Discharge Permit, which is issued by the Environmental Compliance Division. Federal, state and local regulations are enforced through permitting, monitoring and inspections. As previously mentioned, there are five SIUs currently permitted, plus the one categorical business.

Currently, all businesses regulated under the Industrial Waste Discharge Program are inspected and sampled a minimum of once per year for compliance with the Municipal Code. In the past, inspections and wastewater sampling have focused on sanitary sewer discharges. Since 1998, when the storm water ordinance came into effect, annual inspections have also included education about storm water issues and a site check for compliance with storm water regulations. For example, the inspector walks around a facility exterior to check for evidence of any illegal discharges. All loading dock areas, chemical and materials storage areas, and storm drains are checked. All storm drains located on the property are also checked to be sure that they are kept clean and operational (i.e. not full of leaves and sediment).

BMP #IF-1: Conduct Site Visits at Significant Industrial Users (SIUs)

Facilities Regulated Under the State General Industrial Permit

List of Facilities

The City will work towards identifying and verifying that all regulated industrial facilities have filed a NOI with the SWRCB for coverage under the General Industrial Permit. As previously mentioned, the Industrial Activities Storm Water General Permit program requires 10 types of industries to file a NOI to be covered by the General Industrial Permit. The 10 types of industries are the following:

1. Facilities Subject to Storm Water Effluent Limitations Guidelines, New Source Performance Standards, or Toxic Pollutant Effluent Standards
2. Manufacturing Facilities (specific SIC codes)
3. Oil and Gas/Mining Facilities

4. Hazardous waste treatment, storage, or disposal facilities
5. Landfill, Land Application Sites and Open Dumps
6. Recycling Facilities
7. Steam Electric Power Generating Facilities
8. Transportation Facilities
9. Sewage or Wastewater Treatment Works (with design flows greater than 1 mgd)
10. Manufacturing Facilities Where Industrial Materials, Equipment, or Activities Are Exposed to Storm Water) (specific SIC codes)

The City will obtain and review the list of regulated industries that have filed a NOI with the RWQCB on an annual basis, and will check this list with the City's own list of permitted industrial facilities. If discrepancies are noted re industries that should have filed a NOI and did not, the City will notify the RWQCB immediately and inform the industrial facility of the regulations.

BMP #IF-2: Identify and Verify That Regulated Facilities Have Filed a NOI, Notify RWQCB of Discrepancies

Site Inspections At Industrial Facilities That Have Filed a NOI

The City's Environmental Compliance Program (EC) will conduct site visits at these industries that will include a review regarding compliance with the State Industrial Permit regulations and those of the Storm Water Ordinance and mandatory BMPs. If the City already regulates a facility under the Industrial Waste Discharge Program, then compliance with these requirements will be incorporated into the site's regular annual inspection and an additional inspection will not be conducted. Therefore, staff will conduct a site visit at all of these additional regulated industries (except for the Santa Cruz Port District) once during the 5 year permit period.

If a violation of the State's General Industrial Permit requirements is detected during the inspection, the City will immediately inform the business owner of the violation and notify the RWQCB. If the violation is also a violation of the City's Municipal Code or the mandatory BMPs, then the City will undertake warning or enforcement actions to bring the site into compliance. The City's actions will depend upon the severity of the violation detected. If compliance is not achieved in a timely manner and as approved by the City, then additional enforcement actions will be taken. Enforcement actions will be escalated until compliance is achieved. The City will also conduct follow-up site visits as appropriate.

BMP #IF-3: Conduct Site Visits at Industrial Facilities That Have Filed a NOI

Best Management Practices and Checklist

The City has developed Best Management Practices for Industrial Facilities. A copy of the BMP brochure is included in Attachment 19. A checklist of the BMPs has also been developed so that

a facility may use it to self-monitor. The checklist will be provided upon request or during site inspections. A copy of the BMP checklist is included in Attachment 20.

Education and Outreach

As previously mentioned, the City will distribute a BMP brochure and a checklist to all industries regulated by the City and to all inspected industries that have filed a NOI under the General Industrial Permit program during the site inspections. This will be done during all initial or new site visits and in subsequent years if the business has not retained a copy.

BMP #IF-4: Conduct Education and Outreach to Regulated Businesses

IV. Program Implementation

City Personnel

The Environmental Compliance Division is primarily responsible for implementing the existing Industrial Waste Discharge Program. Environmental Compliance will also conduct the site inspections for those facilities that have filed a NOI, under the General Industrial Permit, but are not permitted by the City under the Industrial Waste Discharge Program. Table 7-1 lists each BMP and the responsible department/division:

Implementation Timetable and Measurable Goals

The City has established a timetable for implementation of the Illicit Connections and Discharge Program. Measurable goals will be used to assess the City's efforts to reduce illicit connections and discharges, and to evaluate the success of the program each year. A list of the BMPS, measurable goals, and the implementation schedule are detailed in Table 7-1 below:

Table 7

BMPs, Measurable Goals, and Implementation Schedule

BMP #	BMPs	Measurable Goals	Responsible Dept. or Division	Implementation Schedule
	Industrial Waste Discharge Program			
IF-1	Conduct Site Visits at Significant Industrial Users (SIUs)	Annual site visits at 100% of SIUs	Public Works: Environmental Compliance	Year 1-5
	Facilities Regulated Under the State General Industrial Permit			
IF-2	Identify and Verify That Regulated Facilities Have Filed a NOI, Notify RWQCB of Discrepancies	1. Annual review of list of regulated industries that have filed a NOI with the RWQCB and comparison to the City's list of permitted industrial facilities 2. Notify the RWQCB of 100% of discrepancies re industries that should have filed a NOI and did not	Public Works: Environmental Compliance	Year 1-5
IF-3	Conduct Site Visits at Industrial Facilities That Have Filed a NOI	Conduct site visit at 100% of additional sites not already in the City's SIU program once every 5 years	Public Works: Environmental Compliance	Year 1-5
	Education and Outreach			
IF-4	Conduct Education and Outreach to Regulated Businesses	Annually distribute BMP brochure at 100% of initial or new sites, and as needed at current sites if the business has not retained a copy.	Public Works: Environmental Compliance	Year 1-5

Table 7-1: Responsible Department or Division Contact Information

Public Works Department: Engineering
Associate Civil Engineer, (831) 420-5428

Public Works Department: Environmental Compliance Office, Wastewater/Pretreatment Division
Laboratory/Environmental Compliance Manager, (831) 420-604

V. Program Documentation and Reporting

The City will maintain records to document program implementation and annual progress. The City will report the results of the program in the annual SWMP report to the Regional Water Quality Control Board. The report will include information and a summary of the progress made relative to the measurable goals.