

## Under Cover



Have you ever considered moving your operations or materials indoors to qualify for a No Exposure Certification (NEC)? I know what you're thinking. "Sure that would be great, but it is just too costly to build a structure." We sat down with Bob McKinnon, the District Sales Manager with Nucor Building Systems, and discussed the time and cost associated with building a steel structure. We were surprised at what he had to offer.

**Rain Events (RE):** *Many facilities these days are looking for options to prevent their operations from being exposed to storm water. One possible solution is to move their operations indoors. How can building a steel structure assist these facilities?*

**Bob McKinnon:** Nucor can meet each facility's specific needs by customizing the building to their specifications and creating any size structure. Whether it is simply a roof structure or a completely enclosed structure, we can design a building to meet the facility's needs.



**RE:** *Are steel structures considered permanent structures? What kind of lifespan do these structures typically see?*

**Bob:** These are permanent structures. There is no real maintenance to perform, and the materials come with a 1-year warranty and typically with a roof warranty of 25 – 30 years. However, the structures last much longer than the warranties.

**RE:** *How long does it take to design and fabricate a structure?*

**Bob:** Typically, a standard structure would take 6 – 8 weeks for the drawings, calculations, materials, and delivery.

**RE:** *If I was looking to build a basic 50' x 100' structure, approximately how much should I expect to spend?*

**Bob:** A standard 50' x 100' structure with the roof only would be approximately \$5.50 - \$7.00/ft<sup>2</sup>. The same structure completely enclosed would be approximately \$10.00/ ft<sup>2</sup>. A general contractor would need to assemble the structure on your site which typically costs around \$5.00/ ft<sup>2</sup>.

**RE:** *This comes to a total of approximately \$75,000. I have seen more than that amount just in settlement fees with third party Clean Water Act civil suits. Treatment can certainly cost all of that; if not much more. Thank you, Bob, for showing us how this can be a viable compliance option. In the next section, we will explore how an NEC could easily have a 10-year payout for a building like this.*



## No Exposure, No Problem!

If a facility is completely covered, and does not have industrial activities or pollutant sources exposed to the elements, is it still required to be covered under the Industrial General Permit (IGP)? *The Rain Events* staff posed this question to Robert Ditto of the Central Valley Regional Water Quality Control Board.

Mr. Ditto replied:

*"If your facility's industrial activities or SIC code is not listed in the IGP or is listed in Attachment 1, Category 10 of the IGP, you do not need to be covered under the IGP. If you are listed in Attachment 1 categories 1-9 of the IGP, you are required to apply for coverage under the IGP; however, you can file for a No Exposure Certification (NEC) and, if it is granted, you will be exempted from storm water monitoring activities."*

Mr. Ditto then added,

*"If you qualify for a NEC, you can download and complete the NEC form on the State Water Resources Control Board's website at:*

*[http://www.waterboards.ca.gov/water\\_issues/programs/stormwater/monitoring.shtml](http://www.waterboards.ca.gov/water_issues/programs/stormwater/monitoring.shtml).*"

For facilities considering filing a NEC and having SIC codes listed in Attachment 1, Category 10 (*Manufacturing Facilities where Industrial Materials, Equipment, or Activities are Exposed to Storm Water*), make sure that the following permit requirements are met:

1. All prohibited non-storm water discharges have been eliminated or otherwise permitted.
2. All areas of past exposure have been inspected and cleaned, as appropriate.
3. All materials related to industrial activity (including waste materials) are not exposed to storm water or authorized non-storm water discharges.
4. All industrial activities and industrial equipment are not exposed to storm water or authorized non-storm water discharges.
5. There is no exposure of materials associated with industrial activity through other direct or indirect pathways such as particulates from stacks and exhaust systems.
6. There is periodic re-evaluation of the facility to ensure Conditions 1, 3, 4, and 5 are continuously met.
7. The no-exposure evaluation has been documented, is kept onsite, and is readily available for review.

### How Much Money will You Save with a NEC?

While the economic savings from having a NEC may be difficult to estimate because of the numerous variables to consider, we can offer some estimates of potential cost savings ...

- ⇒ \$400/year in annual reports
- ⇒ \$600/year in ACSCsEs
- ⇒ \$1,000/year in sample collection and analysis
- ⇒ \$1,000/year in monthly and quarterly inspections
- ⇒ \$500/year in SWPPP revisions
- ⇒ \$500/year in storm water training costs
- ⇒ \$1,359/year for the State's permit annual fee (Attachment 1, Cat. 10)

The above savings add up to \$5,359/year. This does not include additional significant savings in the cost of BMPs for materials stored outside and for good housekeeping. But, perhaps, the biggest cost avoidance is in not facing potential third party Clean Water Act litigation which has an average settlement cost of more than \$50,000.

## Covering Options in a Pinch

What happens when that unexpected storm comes in? What are your options for covering things quickly? Using some creativity and a trip to the local Home Depot or hardware store, you can come up with some last minute covering solutions.

### Try plastic sheeting ...

A 20' x 100' roll costs approximately \$100. Place chemicals in a contained area (earthen berm lined with plastic sheeting) and cover the berm with plastic sheeting that has been secured or weighted down.



### Try a Job-Site Box ...

For storage of small quantities of paints or other (non-flammable) chemicals, consider using a job-site box that will be placed in a safe and secure area or within a pickup truck. The pictured 48" steel box costs less than \$300 and the 48" plastic tote costs about \$150.



## "To Do List" for September:

- Make sure the 1<sup>st</sup> Quarter Non-Storm Water Observation is performed (Forms 2 & 3) by September 30.
- Get your wet season inspection forms, chain-of-custodies, and sample kits ready.
- Prepare the facility for the rainy season by opening up and cleaning out storm drains; cleaning storm drain lines with a Vac-con truck; cover materials that may pollute storm water runoff; sweep paved areas; and cleanup any spills or used absorbent.
- Schedule annual storm water training (*check out the 2013 Storm Water Awareness Week workshops for free training that may qualify for your annual training*).

### Compliance Groups to form soon ...

Are you interested in possibly joining a Compliance Group for your industry sector as allowed under the new permit? We are gauging interest and collecting contact information for the following industry groups:

- Bulk Petroleum Terminals
- Auto Dismantlers
- Trucking Companies
- Recyclers
- Light manufacturing
- Wineries
- Food processing plants

Please drop us a line if your facility would like to find out more.



## We Have an August Contest Winner!

**Richard French** submitted the winning answer!

*The question was...*

*Question: The new IGP will require a facility to have 4 QSEs. What does the acronym QSE stand for and what is the definition of a QSE according to the draft permit?*

**Answer:** A Qualifying Storm Event is a precipitation event that:

- a. Produces a discharge for at least one drainage area; and
- b. Is preceded by 48 hours with no discharge from any drainage area.

Richard wins \$25 to



Great job!

## **B u M Ping up Your Maintenance**

Covering pollutant sources does not need to be expensive or time consuming. Stockpiled materials like automobile or machinery parts, e-waste, and scrap metal are commonly sources of pollutants for industrial facilities. These sources can be managed by palletizing the materials and wrapping with plastic. If palletizing the materials is not practical, consider consolidating the material in a central area and creating a temporary material cover. The temporary material



cover seen here can be created using plastic sheeting which is readily available from your local hardware store. One challenge is keeping the sheeting securely in place especially during windy conditions. An innovative product, called the Symmloc fastener, can be



used with plastic sheeting, tarps, geotextiles, or similar materials, to securely and quickly connect and anchor-down pieces of the covering. This is far more effective than traditional methods involving sandbags, tires, or spare parts. Be sure that, if a temporary cover is over oily parts or other liquids, that containment



is also used to prevent the discharge of any spilled liquids or contaminated water. For more information on Symmloc fasteners, visit <http://www.symmloc.com/>.

### **Portable Storage Containers**

One of the most common ways to store materials out of the rain is in a temporary portable storage container. These containers can be rented from companies like Mobile Modular ([www.mmrents-portablestorage.com](http://www.mmrents-portablestorage.com)).

They come in various lengths ranging from 10' to 40'; and, at a monthly rent of \$75 to \$120, provide an affordable covering solution for your industrial facility. One effective way to make these containers not only a covering but also containment is to elevate the front of the container higher than the back so that any spills drain towards the back of the container away from the doors.



## SUBMISSION OF COMMENTS

The State Water Board will accept both written and oral comments on the July 2013 Draft Industrial General Permit. Oral comments must be made at the public hearing.

All evidence (e.g., photographs, data, testimony) and written comments must be received by **12:00 noon on Thursday, September 12, 2013** and addressed to:

New Deadline is  
Thursday,  
September 12

Jeanine Townsend, Clerk to the Board  
State Water Resources Control Board  
1001 I Street, 24th Floor  
Sacramento, CA 95814

After the written comment deadline, State Water Board staff will not accept any additional written comments or materials on the draft documents. Comment letters may be submitted electronically, in PDF format (if less than 15 megabytes in total size), to the Clerk to the Board via email at [commentletters@waterboards.ca.gov](mailto:commentletters@waterboards.ca.gov). If the file is greater than 15 megabytes in total size, then the comment letter may be submitted by fax at (916) 341-5620. Please indicate the subject line: "Comment Letter – Industrial General Permit"

## September Storm Water Contest

Try it out! You can win!

By **October 1, 2013**, submit a response for the following question by email to [steravskis@wgr-sw.com](mailto:steravskis@wgr-sw.com).

**Question:** On what day does the storm season begin for the IGP?

All persons submitting the correct answer will be placed in a drawing. The winner will receive a \$25 gift card to Chili's to celebrate the start of the rainy season!

**Need your crew trained to take storm water samples, measure pH in the field, and do monthly observations?**

WGR will come to your facility and provide a two-hour training session for **\$425**.

Appointments must be booked with [aortiz@wgr-sw.com](mailto:aortiz@wgr-sw.com) and facilities must be located within 50 miles of our Lodi or Los Alamitos offices. Discount pricing is also available for facilities farther than 50 miles, please contact Aaron Ortiz for more details. Offer does not apply to prepaid compliance programs.



*Please contact us if you have any questions ...*

**Rain Events Newsletter Editor:**

John Teravskis [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com)  
(209) 334-5363 ext. 110

**Technical Questions about Storm Water Compliance?  
Call ...**

Aaron Ortiz, [aortiz@wgr-sw.com](mailto:aortiz@wgr-sw.com), (209) 810-5151  
Steve Teravskis, [steravskis@wgr-sw.com](mailto:steravskis@wgr-sw.com), (209) 642-5020  
John Ripley, [jripley@wgr-sw.com](mailto:jripley@wgr-sw.com), (310) 629-5259

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- ⚡ PDU opportunities
- ⚡ Meet your facility's annual training requirements



[WWW.STORMWATERAWARENESS.ORG](http://WWW.STORMWATERAWARENESS.ORG)

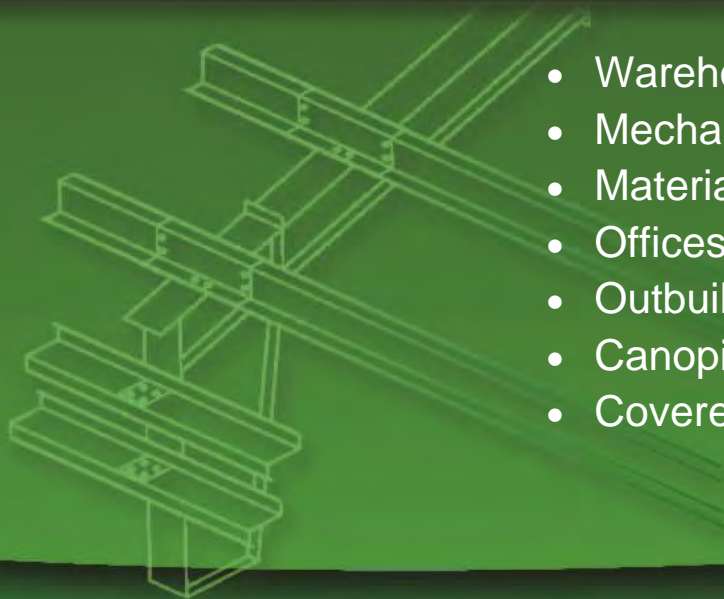


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Bob McKinnon

(209) 369-9636

Bob.mckinnon@nbsut.com



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