



**Winter's over,  
now it's spring!  
Are you ready  
to clean?**

It's the height of spring! The flowers, warm weather, spring showers, and soft breezes stir up a need for a fresh outlook and start. So, what should you do? That's right! It's time to pull out your cleaning supplies for a little spring refresh. In this month's edition of **The Rain Events**, we will be looking at three ways you can do a bit of spring cleaning at your facility. Not only will this be beneficial to your storm water program and help you comply with the Industrial General Permit (IGP), but it will make your facility look polished and welcoming.

**Trash:** The first step to spring cleaning is getting rid of the garbage and starting fresh. This allows for the rest of the cleaning to be more thorough and effective since you won't have to clean around the junk. Not only does trash dispersed around the facility make the site appear messy and unappealing, but it can also wash into the storm water system, get blown away by the wind, or invite pests to take up residence at the facility. Not to mention the attention it attracts from storm water or city inspectors who are on the lookout for trash violations which could end your facility up

with some serious corrective actions or fines. One of the best ways to keep this from happening is to clean up any trash, industrial activity debris, or trash migrating onsite from external sources (like homeless encampments, public littering, or busy thoroughfares) and then maintain all that spring cleaning you did over the rest of the year and make sure old issues with trash don't pop back up.

Sometimes the task of trash management on an industrial facility may seem beyond feasible because of the trash generating activities that might be happening in mass

(think a recycling facility, an auto dismantler, or a waste facility), but there are some of the things you can do to keep a facility trash free even in the face of seemingly insurmountable odds. The biggest way to decrease the volume of trash

exiting your facility is to keep containers, stockpiles, and garbage bins covered. By keeping these covered, wind dispersion can be kept to a minimum. While it may be a hassle to keep everything wind-proof, this is one of the biggest ways to prevent further trash pollution. Not only does covering trash keep the wind from scattering it here and yon, but it also protects rainwater from penetrating and collecting potential pollutants by second hand contamination from coming into contact with a pollutant source in the garbage pile. According to the permit, an industrial facility is required to "cover industrial waste disposal containers and industrial material storage containers that contain industrial materials when not in use," and "divert run-on and storm water generated from within the facility away from all stockpiled materials." Basically, if it could possibly cause a trash issue—cover it. Successful trash programs depend on effective training of employees on good housekeeping practices, applicable BMPs, and general pollution prevention plans. Covering, dealing with issues as they arise, and keeping everything neat and tidy will be your best route for trash management.

***Is A Tarp An Acceptable Covering For Dumpsters?***





An acceptable and helpful BMP which falls under the umbrella of good housekeeping are storm-resistant shelters over dumpsters or bins. The definition of a storm-resistant shelter is found in Section VII, which is the part of the IGP that deals with No Exposure Certifications (NECs). However, there is a much more succinct definition in Section B.3.e of Appendix 2: Storm-resistant shelters include: (1) completely roofed and walled buildings or structures, (2) structures with only a top cover (no side coverings) supported by permanent supports, provided material within the structure is not subject to wind dispersion (sawdust, powders, etc.) or being tracked out of the facility, and is not a source of pollutants in the industrial storm water discharges. Some may ask if covering materials with a tarp constitutes a rain - resistant shelter for facilities claiming NEC status. However, according to Section B.4.f of Appendix 2, this is acceptable only during construction or renovation activities, and not for materials which are subject to wind dispersion. Also, these “temporary shelters” may only be used as necessary, for a period of ninety days or less, and only until a permanent storm-resistant shelter is available. For more details, see Sections B.3.e and B.4.f of Appendix 2 in the Industrial General Permit.

**Sweeping:** Not only is street sweeping one of the most cost effective and efficient BMPs, but it is probably one of the oldest! Street sweeping was first invented by English engineer, inventor, and philanthropist Joseph Whitworth who created the first model of a

mechanical street sweeper in 1843. His street sweeper was horse drawn and made up of a large drum covered in stiff wire bristles that would brush debris (horse poop) onto an elevator system and into a storage area. In 1849, C.S. Bishop brought a similar invention to the United States. Today, mechanical sweepers and vacuum/air sweepers are common sights at facilities to help keep the pollutant load under control and keep the facility looking spotless. But is street sweeping really that effective and important? Aside from aesthetic purposes, street sweeping matters for a variety of reasons. When a lot of industrial activities are occurring that generate fine dust and debris, sweeping is crucial for controlling the airborne spread of fine particulate matter from wind or trackout. It's especially important during the wet season when pollutant dust gets liquified in a storm event and washes down the drain. Debris like organic matter, metals, trash, microplastics, toxics, bacteria, and more can be collected by sweeping. Fortunately, pollutants like sediment are almost always visible, and can be cleaned up fairly easily.

As we've talked about in this newsletter before, many times we have noticed a direct link between total suspended solids (TSS) and other pollutants – high TSS tends to correlate with high concentrations of metals, nutrients, and toxic substances. So, staying on top of any loose sediment, dust, or dirt on your facility paved areas can have the added advantage of keeping other pollutants

under control.

Microplastics are also becoming a big water quality concern, and even though it is not currently a regulated monitoring parameter in the Permit, street sweeping will serve a dual purpose of removing these small particles while cleaning up other pollutants. This up-and-coming pollutant has vast detrimental effects on wildlife and human health and because of plastic's lack of degradation, it's only accumulating into a bigger problem as time progresses.

**BMPs:** After a long winter of wet and harsh conditions, BMPs around your facility may not be at their finest. And as we look ahead to sunny and hot summer days with a lot of solar decomposing, your BMPs will likely have a very short life ahead of them. So, before summer arrives, clean out all the pollutants which accumulated in your BMPs over the winter. Refresh your site with new compost socks or straw wattle. Clean out or replace with all new drain inserts and filtration systems or devices. It's also a great time to start working on adding any advanced BMPs your facility wants to add to their storm water program—things like permanent or temporary cover, retention ponds, treatment controls, filtration devices, and etc. Have you been tossing around some ideas of how to improve your sampling results? Act on it now – as this rainy season comes to a close and before the next one starts. The more storm water that can be captured, evaporated, infiltrated, retained, and cleaned prior to it leaving your site, the better the sampling results will be. And if you can get your industrial activities under cover, that's all the better because it reduces the pollutant source.

So, get that spring in your step and start working on cleaning your facility and making it ready for summer. Not only will it be rewarding in the long run for your storm water program, but it will also pay off in the short term for the aesthetic and tidy cleanliness of your facility.

## The Rain Events

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# *Storm Water Contest...*

Each month, we invite our readers to participate in a contest to test their knowledge of the Industrial General Permit and show their storm water compliance program. We enter all submittals to our monthly newsletter question into a drawing and one person is selected at random to receive a \$25 gift card. Last month's contest question was:

*What do the 4 digits mean in an SIC code?*

Congratulations to Martijn who replied *"Every company has a primary SIC code that indicates its main line of business. The first two digits of the SIC code identify the major industry group, the third digit further defines the industry group, and the fourth digit identifies the specific industry."* Martijn, we hope you enjoy your next Amazon shopping trip on us!

## *...This Month's Contest*

*Can you use a tarp to cover a dumpster and still be compliant?*

We need industrial storm water sleuths to help us with this month's question. Submit your answers by Friday, May 10th. Email your answer to [jteravskis@wgr-sw.com](mailto:jteravskis@wgr-sw.com). One winner will be selected by a random drawing to receive a \$25 gift card to Home Depot.

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