Sector Specific General Permit for Scrap Metal Recycling Facilities

(Order No R8-2012-0012, NPDES No. CAG 618001)

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Permitted Facilities

- Limited to SIC code 5093 – Scrap and Waste Materials
  - Does not include yards that only dismantle and sell used parts.
  - Does not include facilities that only sort, compact, store, and transport scrap metal (primarily non-industrial source scrap).

Signing Up

- Like the Statewide General Construction Permit, almost all sign up activities and reporting are done online in SMARTS.
- Sign up deadline is May 10, 2012.
- Fee is same as General Industrial $1359, partial refunds will be processed by the State.
- RB staff will terminate your old permit.
- Your final 2011/12 Annual Report will still be due on or before July 1, 2012 (paper copy ok).

Signing Up

By May 10, 2012, on SMARTS:

- Identify the Legally Responsible Person (LRP).
- Select either Option 1 or 2.
- Load an updated pdf-version of your SWPPP.
- Load an updated pdf-version of your site map.

Keep updated and certified version of SWPPP/map on site.

No Exposure Certification/No Discharge

Option 1 or Option 2

There are two options in this permit:

- Option 1 is a phased approach that includes Numeric Action Levels (NALs) and requirements based on exceedances of those NALs. BMPs must be implemented by October 1, 2012.
- Option 2 is for those few facilities that do not want regulatory oversight of their BMP implementation and believe they can meet the Numeric Effluent Limits (NELs) in the permit.

Storm Water Pollution Prevention Plan (SWPPP)

- Should be similar to your current SWPPP, updated to meet this permit.
- Must list the SWPPP preparer and person responsible for implementing the SWPPP.
- Developer certification (QSD) is NOT required until August 12, 2013.
- Description of Preventative and Mitigative Measures for Option 1/Phase 1.

Facility Site Map

- Location of facility.
- Location of storm water conveyance system, discharge and monitoring points.
- Location of fueling areas, material storage, industrial process areas, unloading & loading areas, spill clean up kits, treatment control equipment, and any areas of potential run-on.

Qualified SWPPP Developer/ Practitioner (QSD/QSP)

- If State Board adopts the Industrial General Permit, we may piggyback. If not we will develop our own certification.

- In any event, no QSD/QSP is required until August 12, 2013.

Phase I – Preventative Measures

Twenty-three listed (pages 21-23), but many should already have been done as part of the old General Permit.

- Pave erodible, industrial areas.
- Divert clean flows from industrial areas (include LID).
- Secondary containment and cover over chemical and haz mat storage.
- Consolidate discharge to a minimum of discharge points.
- Minimize storm water contact with contaminating building materials.
- Develop a Rain Event Action Plan (REAP).

Rain Event Action Plan (REAP)

- This plan shall be implemented in advance of a storm with a 40% or greater probability based on www.weather.gov.
- In addition to normal BMPs, consider:
  - Temporarily covering exposed materials
  - Ensure all control measures are functional
  - Sweep site, manage trash and debris
  - Ensure trash bins are covered
- A record of all activities shall be signed and dated for each predicted rain event.

Phase I – Mitigative Measures

- Documented spill response procedures, personnel and record keeping.
- Based on past monitoring, identify where treatment controls will likely be required based on NAL exceedances.
- Develop and implement control measures for oily wastes.

Monitoring and Reporting Program

- To be prepared by May 10, 2012 as part of the SWPPP.
- Includes monthly visual inspections and sampling of storm water runoff.
- Can be either individual plan or Group Monitoring plan.
- Currently NO Group Monitoring Programs have been submitted or approved.

Visual Inspections

Monthly inspections (at least 15 days apart) should be done starting May 2012, and include:

- Date/time, name of inspector and weather.
- Observed authorized or unauthorized non-storm water discharge with descriptions.
- Oil stains within site or tracking from the site.
- Spills or leaks, debris or trash.
- After August 2013, inspections will be performed by a QSP or under direction of a QSP.

Sampling

- Sample 4 qualified storms each year.
- Sample each discharge point that drains industrial areas.
- Sample as close to the start of discharge as possible.
- A qualified storm has to be preceded by 2 days of no runoff.
- Samples must be collected by a certified person
- A simplified Quality Assurance Program Plan (QAPP) template will be developed by Regional Board staff for permittee use, prior to the 1st rainy season.
- After 2 years, sampling may be reduced with Regional Board Executive Officer approval.

Sampling

- pH, turbidity and specific conductance are to be measured at the time of collection.
- Oil & grease, total petroleum hydrocarbons, zinc, lead, nickel, silver, aluminum, copper, iron, cadmium, arsenic, chemical oxygen demand are to be performed by a certified lab.
- PCBs (method 608) for 1st year sample
- Acute Toxicity for 4th year sample.

Numeric Action Levels (NALs)

Constituent	Action Level
pH	6.5 – 8.5 pH units
Turbidity	250 NTUs
Specific Conductance	2000 umhos/cm
Oil and Grease	15 mg/L
Chemical Oxygen Demand	120 mg/L

Constituent	Action Level
Aluminum	0.75 mg/L
Copper	0.0189 mg/L
Iron	1.0 mg/L
Lead	0.122 mg/L
Zinc	0.16 mg/L

NAL Exceedances

- It is understood that storm water discharges can be highly variable, so safeguards are built in.
- If a single sample exceeds an NAL by two times (or pH is less than 5.5 or more than 9.5 pH units), it is considered an exceedance triggering Phase II or III
- If the annual average exceeds an NAL, it is considered an exceedance triggering Phase II or III.

NAL Exceedances

- For averaging a year's storms, the arithmetic mean of pH is used, the geometric means of all other results.
  - If a site has 1 discharge point and pH values of 6.0, 7.2, 6.8 and 6.6, the average is (6.0+7.2+6.8+6.6)/4 = 6.65 pH, which is not an NAL exceedance
  - If a site has 1 discharge point and zinc values of 0.10 mg/L, 0.30 mg/L, 0.11 mg/L and 0.05 mg/L, the average value is $(0.10*0.30*0.11*0.05)^{1/4}$ = 0.11 mg/L, which in not an NAL exceedance

NAL Exceedances

- If a facility has more than one discharge point, the percentage of the industrial area draining to that discharge point will be used.
  - There are two discharge points, Point A that receives the flows from 20% of the industrial areas and Point B that receives flows from the other 80%.
  - Sampling from a storm event yields 0.32 mg/L zinc at Point A and 0.10 mg/L zinc at Point B. The area weighted average is (0.32 mg/L *0.20)+(0.10 mg/L * 0.80) = 0.14 mg/L.

Phase II

- If there are NAL exceedances during Phase I, a facility will need to implement Phase II in the following year.
- Development and implementation of additional preventative and mitigative measures.
- If it is unlikely that additional preventative and mitigative measures will achieve NALs, treatment may be necessary.
- These additional measures will be identified in a Phase II Corrective Action Plan which will need to be submitted to Regional Board staff for approval.

Upcoming Issues

- Update existing site SWPPP, site map and update/prepare monitoring & reporting plan.
- Submit Permit Registration Documents on SMARTS by May 10, 2012.
- Start conducting monthly visual inspections starting May 2012.
- Planning the implementation of the Preventative and Mitigative BMPs.

Future Issues

- Criteria for Certified Persons for Sample Collection and Handling
- QSD/QSP and Monitoring Certification
- QAPP Development
- Annual Report Under This Permit
- Sampling Reductions
- Design Storm for Treatment BMPs
- Phase II and Phase III