

WINTER 2024



Environmental Health & Safety From Experience

Six Common Storm Water Compliance Issues

Discharge of storm water from industrial sites is regulated by either a state or, less frequently, the U.S. Environmental Protection Agency (US EPA). Under these regulations, a site must either:

- Apply for a storm water permit, which requires development of a Storm Water Pollution Prevention Plan (SW3P) addressing areas of concern, inspections, and monitoring procedures to address storm water pollutant management at a facility, or
- Submit a “No-Exposure” exclusion certification that demonstrates there are no storm water exposures to industrial activities at the site.

Hixson frequently works with both the permitted and the “No-Exposure” facilities to verify compliance. Through our experience, we see common situations, activities, and/or behaviors that simply change over time and cause facilities to go out of compliance. These include:

- **Trash compactors.** Just because waste is delivered into a “sealed” trash compactor does not mean it cannot leak. As the compactor works its magic, liquid is squeezed out, which may leak onto pavement and into the storm system if the compactor’s seals are old, worn out, or there is debris preventing a tight fit of

the seal. When this occurs, request a replacement from your trash service provider.

- **Trailer washes.** Making trailers nice and shiny is a great idea for marketing, but a bad idea if grease and other pollutants find their way into the storm drains. Some facilities attempt to prevent this by designating the use of “water only” for washdown; however, oils and grease may still wash off the tractors and trailers. Even facilities with separate wash bays that have drains going to a sanitary sewer can be problematic when long lines at the bays send truckers to non-approved locations on property to wash their trucks. And be wary of third-parties who claim to protect the

Continued on next page. >

EXPERIENCE IN BRIEF

As safety professionals, we at Hixson look for ways each year to stay on top of the current topics, trends, and regulations involved with our field. For example, Hixson Senior EH&S Specialist Wendell Turner recently attended the 2024 Ohio Safety Congress & Expo at the Greater Columbus (Ohio) Convention Center.

If you’re looking to boost your own knowledge, but maybe don’t have the time or budget to attend a national conference, there are plenty of local conferences throughout the country that can provide similar updates (and which may provide a regional perspective). Need help finding something? [Let us know!](#)

storm drains: Wash water with pollutants can still make their way into supposedly covered storm drains due to cracks in the pavement, poor drain cover seals, and other issues.

- **Boneyards.** Many industrial facilities have outdoor storage areas where old equipment, motors, chemical containers, and other items are staged until reuse or are considered a write-off. This equipment commonly releases oils and particulates to the pavement. If exterior storage of these items is necessary, storm-resistant shelter or covers must be employed to prevent materials and storm water from contacting these materials and carrying pollutants into storm drainage.
- **Fuel islands.** Many distribution centers have onsite fuel islands for the commercial trucks as well as the yard tractors. Not all such areas are provided with a canopy or sloping paved areas to a collection system fitted with an oil/water separator prior to discharge to the sanitary sewer system. Also, the oil/water separators may not be on a regular preventative maintenance schedule for pump out.
- **The rooftop.** It can be easy to forget what you don't see all the time. Equipment that discharges to air through the roof, e.g., fryers exhausting to a stack, can leave a sheen of oil across the roof, which will then drain into the storm system when it rains.
- **Evaporative Condensers.** These units contain biocides and de-scaler chemicals. The blowdown (discharge) from these units must be plumbed to a sanitary drain line (or must be covered by a separate direct discharge permit (e.g., NPDES). It is common to find the blowdown discharging directly onto the roof and then to the storm drain system or to nearby ground.

If you recognize any of these issues at your facility, consider taking remedial action sooner rather than later to regain compliance with your permit or no-exposure certification.

RELATED CONTENT

- [EPA Periodic Requirements: Be Prepared!](#)
- [Lithium-Ion Battery Safety: What the Code Does...and Doesn't...Say](#)

FREE WEBINAR SERIES!

Go to www.hixson-inc.com/insights/foodplant-of-the-future to register or access archives of Hixson's webinars.



CONTACT US

Direct any comments or questions to:

Joe Weisgerber, P.E., CPEA

Manager, Environmental Engineering/
Health & Safety

jweisgerber@hixson-inc.com

Phone: 513.241.1230

www.hixson-inc.com