

The goal of the site inspection program is to confirm that stormwater BMP's are effectively implemented in compliance with State law, County and municipal ordinances, Regional Board Resolution 98-08 and the (SQMP). In addition to these requirements, Retail Gasoline and Automotive Dealerships must meet the requirements of the Stormwater Quality Task Force Best Management Practice Guide for Retail Gasoline and Automotive Dealerships.

C.1 INSPECTION ENTRY PROCEDURES

- Present your credentials to a responsible facility owner/operator, whether or not identification is requested.
- Explain the purpose of the inspection and appropriate laws and regulations that mandate the inspection requirement.
- The facility owner/operator must consent to the inspection. If the inspector is allowed to enter, entry is considered voluntary and consequential. The absence of an expressed denial can be considered authorization to continue the inspection.
- Do not sign any type of “waiver”, “visitor release” or document with restrictive conditions that would relieve the facility owner/operator of responsibility for injury or limit your rights to use information obtained during the inspection. Explain that you cannot sign the form and request a blank sign-in sheet.
- If the owner/operator denies entry, ask why. Tactfully probe the reason(s) for denial. In some cases, diplomacy and discussion may be sufficient to overcome the owner/operator’s reluctance. Be careful to avoid saying something that can be misconstrued as a threat such as discussing potential penalties. Avoid inflammatory discussions and/or deepening of misunderstandings. Document all conditions and circumstances surrounding the denial for entry such as: facility name and exact address, name and title of who refused entry
- If the consent is withdrawn during an inspection, follow the same procedure as above. Information obtained prior to the withdrawal of consent is valid.
- If access is denied to some parts of the facility, document the portion of the inspection that could not be performed, the reason for the denial of access, and proceed with the inspection of other areas.

C.2 PREPARING FOR THE INSPECTION

Review existing information and the regulatory history for each site. This would include the review of :

- database of existing permitted facilities
- records of illicit discharges,
- records of violations such as Notices to Comply and Notice of Violations

C.3 BACKGROUND INFORMATION INSPECTORS SHOULD BE PREPARED TO ANSWER

Industrial/Commercial Facilities inspectors need a basic understanding of the background and requirements of the industrial/commercial site inspection program to conduct an effective facility inspection. Facility owners/operators will question the need for the inspection and will ask about the specific requirements of the site inspection program. It is essential that the inspector be prepared to clearly communicate this information, to help develop a rapport with the owner/operator and help the facility come into compliance. The inspector will likely be the first person to inform the facility owner/operator about the industrial/commercial facilities control program; therefore, they play an essential role in promoting the credibility of the program. Common general questions a inspector should be prepared to answer:

What is “stormwater” and “non-stormwater”?

What is “point source” and “no point source”?

What is illicit connection?

What is illicit discharge?

What is the difference between storm drains and sanitary sewers?

What is a NPDES report?

Be able to explain the portion of the NPDES permit that pertains to the industrial/commercial facilities control program

C.4 CONDUCTING THE INSPECTION

1. Inspect the facility layout to locate the storm drain system and/or stormwater drainage path, storage areas, process, areas, and heavy equipment wash and maintenance areas, and stormwater sampling locations, if applicable.
2. Determine the facility’s impact on stormwater quality. The inspector should answer the following:
 - a. What is the facility’s potential to impact stormwater quality from pollutant exposure and non-stormwater discharges?

- b. Are BMPs effectively applied so that pollutant exposure is minimized and non-stormwater discharges are eliminated?
- c. What type(s) of impact does or could the facility have on stormwater quality.

These questions can be answered by observing outdoor and indoor areas of activity as detailed below:

- a. Outdoor activities:
 - i. Wash and rinsing areas for vehicle and equipment washing
 - ii. Outdoor process wash areas
 - iii. Processing and manufacturing areas
 - iv. Parking areas and access roads
 - v. Maintenance and heavy equipment storage areas
 - vi. Waste storage and disposal areas
 - vii. Loading and unloading areas
 - viii. Material storage areas
 - ix. Outdoor drainage from inside areas
 - x. Vehicle and equipment fueling areas
 - xi. Stormwater conveyance system including inlets, open channels, ditches, and roof leaders, where safe.
 - xii. Rooftop equipment areas
 - b. Indoor activities
 - i. Inspect indoor activities and areas to ensure that pollutants are not spilled, dumped, or allowed to flow outdoors.
 - ii. Review the facility's indoor housekeeping procedures
 - iii. Inspect the material handling areas to determine if there is a direct path to stormdrains
 - iv. Inquire about a spill prevention plan and the facility's cleanup procedure for a spill
2. Verify SIC to ensure proper classification
 3. Fill out the Inspection Form
 4. Determine what follow up actions are required of the facility owner/operator and set a follow up inspection date.
 5. Identify and inform the facility contact about problems and violation(s), if applicable. Set a follow up inspection date with the facility to verify that necessary BMPs had been implemented to correct the identified problems.
 6. Discuss and distribute appropriate BMP information, public education material. See Section on BMP Implementation.

Appendix C

Site Inspection Guidance

7. The inspectors would determine if the facility is in compliance with the County Stormwater Ordinance (i.e. there are no unpermitted non-stormwater discharges and pollutant exposure to rain is minimized).
8. Document the inspection.
9. Inform the facility owner/operator of expectations/requirements.

Appendix C
Site Inspection Guidance
