

# TRASH TALKS

*keep it covered*

The saying "one man's trash, is another man's treasure" could have been Oscar the Grouch's motto for life. This little garbage can grump was known for saying, "I love it because it's trash..." Well folks, let's lend an ear to the advice of Sesame Street's very own Oscar, and dive into the subject of trash management. As industrial facilities, according to the California Environmental Protection Agency, "you are responsible for making sure that stormwater runoff does not carry waste, garbage, and floatable debris to receiving waters. To verify compliance with this requirement, you should identify and implement control measures (e.g., good housekeeping, sweeping, keeping lids closed on dumpsters) to keep exposed areas free of such materials... your SWPPP should identify how you will intercept and properly dispose of these materials before they leave your facility."<sup>1</sup> No one likes a messy facility full of garbage and trash – well, maybe Oscar would think he was in paradise in that condition, but he would probably be the only one who'd enjoy it.

Not only does a trashy facility give a run-down appearance to the site, but it also can 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 officials which could end up in hefty fines. One of the best ways to keep this from happening is following the Industrial General Permit requirements:

- Good Housekeeping;
- Preventative Maintenance;
- Spill and Leak Prevention Response;
- Material Handling and Waste Management;
- Erosion and Sediment Controls; and
- Employee Training Program

Sometimes the task of trash management on an industrial facility may seem beyond feasible, but here are some of the



**Oscar would be proud!**

things you can do to keep a facility trash-free. The biggest way to decrease the volume of trash exiting your facility is to keep containers, stock piles, and garbage

bins covered. By keeping these covered, wind dispersion

can be prevented. While it may be a hassle to keep everything snugly covered, this is one of the biggest ways to prevent further trash pollution. Not only does covering containers, stock piles, and garbage bins keep the wind from interfering, but it also protects rain water from penetrating and either eroding materials or carrying off secondary

contamination once storm water comes in contact with trash. According to the IGP, an industrial facility is required to "cover industrial waste disposal containers and industrial



**Properly covered stockpiles.**

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." Successful implementation depends on effective training of employees on applicable BMPs and general pollution prevention plans. Overall, the idea of trash management is to minimize discharges of waste, garbage, and floatable debris. Following good housekeeping BMPs should get you well on your way to having a trash free

facility.

*Good Housekeeping Practices Include:*

- Identifying problem areas and cleaning location upon identification.
- Minimize or prevent material tracking.
- Minimize dust generation.



**A great example of covered waste dumpsters!**

- Keep any facility areas that are impacted by rinse/wash waters clean.
- Cover all stored materials
- Contain non-solid materials or wastes (i.e. powders, particulates, shredded paper, etc.)
- Prevent improper disposal of rinse/wash water and illegal dumping of waste water, such as

what happens with uncovered dumpsters.

- Minimize storm water discharges from non-industrial areas that are in contact with industrial areas.

At the end of the day, trash management boils down to working smarter and not harder. If there is a problem, fix it before it becomes a bigger problem. Take the time to keep the facility and storm water clean by using appropriate good housekeeping measures. In an Oscar the Grouch styled aphorism – manage the trash before it manages you. ☁

1. CalEPA—[https://www.epa.gov/sites/production/files/2015-11/documents/swppp\\_guide\\_industrial\\_2015.pdf](https://www.epa.gov/sites/production/files/2015-11/documents/swppp_guide_industrial_2015.pdf)

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

As mentioned in the article above, one of the Good Housekeeping BMPs mentioned was storm-resistant shelters over dumpsters or bins. According to the General Permit, the definition of a storm resistant shelter is found in Section VII, 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 when 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. ☁

### “To Do List” for May

- ☁ Perform the May monthly inspection
- ☁ If you have not done so yet, perform your Annual Comprehensive Facility Compliance Evaluation.
- ☁ If any problems are found during the Annual Evaluation, revise the SWPPP and implement changes within 90 days.

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### Trash Doesn't Just Affect Us!

In 2016, for Storm Water Awareness Week, we filmed several classes on storm water and how it affects the marine life at SeaWorld San Diego. In this [video](#), come along with us and Jody to find out how SeaWorld rescues and rehabilitates marine animals who have become susceptible to environmental pollutants and trash.



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

### The Rain Events

Newsletter Editor: **John Teravskis**  
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### Technical Questions about Environmental Compliance?

Call ...  
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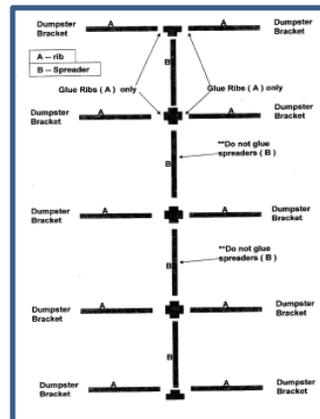


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## Storm Water Contest...

Each month, we invite our readers to participate in a contest to test their knowledge of the Industrial General Permit and 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 question was:

**Can you define a “representative sample” in ten words or less?**

Congrats, Jay Jahangiri, you won! We like Jay's definition of representative sample - “Small quantity of media that accurately reflects that media.” That is exactly what a representative sample is: a small quantity of a material (in this case storm water), which accurately reflects the quality and condition of the whole quantity of the same material (all of the storm water leaving your property). Jay wins a \$25 gift card to Five Guys.

## This Month's Contest Question:

**What should you do if your dumpster is leaking?**

Submit your answers by **Friday, June 7th**. 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 Baskin Robbins**.



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