## NPDES Compliance Inspection Manual

Appendix S



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# Appendix S – Industrial Source Control BMP Questions

#### **Industrial Source Control BMP Questions**

#### **FUELING**

- 1. Has spill and overfill prevention equipment been installed?
- 2. Are vehicle fuel tanks often "topped off"?
- 3. Have steps been taken to protect fueling areas from rain?
- 4. Is runon to the fueling area minimized?
- 5. Are oil/water separators or oil and grease traps installed in storm drains in the fueling area?
- 6. Is the fueling area cleaned by hosing or washing?
- 7. Do you control petroleum spills?
- 8. Are employees aware of ways to reduce contamination of storm water at fueling stations?
- 9. Where does the water drain from the fueling area?
- 10. Do any of the drains connect to wells?

#### **SUMMARY OF FUELING STATION BMPs**

- Consider installing spill and overflow protection.
- · Discourage topping off of fuel tanks.
- · Reduce exposure of the fuel area to storm water.
- · Use dry cleanup methods for the fuel area.
- · Use proper petroleum spill control.
- · Encourage employee participation.

#### MAINTAINING VEHICLES AND EQUIPMENT

- 1. Is maintenance which involves cleaning of vehicle and/or equipment parts (including engine, transmission, brake or other miscellaneous parts) performed on-site?
- 2. Does the cleaning involve the use of solvents or surfactants?
- 3. Has the facility looked into using nontoxic or less toxic cleaners or solvents?
- 4. Are work areas and spills washed or hosed down with water?
- 5. Are spills or materials washed or poured down the drain?
- 6. Are oil filters completely drained before recycling or disposal?
- 7. Are incoming vehicles and equipment checked for leaking oil and fluids?
- 8. Are wrecked vehicles or damaged equipment stored onsite?
- 9. Does the facility recycle any of the automotive fluids or parts?
- 10. Can the facility reduce the number of different solvents used?
- 11. Are wastes separated?
- 12. Does the facility use recycled products?

#### **SUMMARY OF VEHICLE MAINTENANCE AND REPAIR BMPs**

- · Check for leaking oil and fluids.
- · Use nontoxic or low-toxicity materials.
- · Drain oil filters before disposal or recycling.
- · Do not pour liquid waste down drains.
- Recycle engine fluids and batteries.
- · Segregate and label wastes.
- · Buy recycled products.

#### PAINTING VEHICLES AND EQUIPMENT

- 1. Are vehicles or other equipment painted on-site?
- 2. In preparation for painting, is old paint removed physically (sanding, sand blasting, etc.) or chemically (solvent paint stripper)?
- 3. Before applying new paint, are surfaces chemically prepared (coating, etching, cleaning etc.)?
- 4. Is care taken to prevent paint wastes from contaminating storm water runoff?
- 5. Are wastes from sanding contained?
- 6. Are parts inspected before painting?
- 7. Is the facility using painting equipment that creates little waste?
- 8. Are employees trained to use spray equipment correctly?
- 9. Does the facility recycle paint, paint thinner, or solvents?
- 10. Are wastes separated?
- 11. Can the facility reduce the number of solvents used?
- 12. Does the facility use recycled products?

#### **SUMMARY OF PAINTING OPERATION BMPs**

- · Inspect parts prior to painting.
- · Contain sanding wastes.
- · Prevent paint waste from contacting storm water.
- · Use proper interim storage of waste paint, solvents, etc.
- · Evaluate efficiency of equipment.
- · Recycle paint, paint thinner, and solvents.
- · Segregate wastes.
- Buy recycled products.

#### **WASHING VEHICLES AND EQUIPMENT**

- 1. Has the facility considered using phosphate-free biodegradable detergents?
- 2. Are vehicles, equipment, or parts washed over the open ground?

#### **SUMMARY OF VEHICLE AND EQUIPMENT WASHING BMPs**

- Consider use of phosphate-free detergent.
- · Use designated cleaning areas.
- · Consider recycling wash water.

#### **LOADING AND UNLOADING MATERIALS**

- 1. Are tank trucks and material delivery vehicles located where spills or leaks can be contained?
- 2. Is loading/unloading equipment checked regularly for leaks?
- 3. Are loading/unloading docks or areas covered to prevent exposure to rainfall?
- 4. Are loading/unloading areas designed to prevent storm water runon?
- 5. Is piping system routinely checked for leaks?
- 6. Are there alarms to alert staff of potential problems such as high levels in receiving tanks or pressure irregularities in transmission lines?
- 7. Where appropriate (especially where transmission lines are long or buried), is the piping system outfitted with flow meters to ensure that the amount unloaded equals the amount received?

#### **SUMMARY OF LOADING/UNLOADING OPERATIONS BMPs**

- · Contain leaks during transfer.
- · Check equipment regularly for leaks.
- · Limit exposure of material to rainfall.
- · Prevent storm water runon.

#### LIQUID STORAGE IN ABOVE-GROUND TANKS

- 1. Do storage tanks contain liquid hazardous materials, hazardous wastes, or oil?
- 2. Are operators trained in correct operating procedures and safety activities?
- 3. Does the facility have safeguards against accidental discharge?
- 4. Are tank systems inspected, and is tank integrity tested regularly?
- 5. Are tanks bermed or surrounded by a secondary containment system?

#### SUMMARY OF BMPs FOR LIQUID STORAGE IN ABOVE-GROUND TANKS

- Comply with applicable State and Federal laws.
- · Properly train employees.
- · Install safeguards against accidental release.
- · Routinely inspect tanks and equipment.
- · Consider installing secondary containment.

#### **INDUSTRIAL WASTE MANAGEMENT AND OUTSIDE MANUFACTURING**

- 1. Has the facility looked for ways to reduce waste at the facility?
- 2. Has the facility considered waste reduction BMPs?
- 3. Are industrial waste management and outside manufacturing areas checked often for spills and leaks?
- 4. Are industrial waste management areas or manufacturing activities covered, enclosed, or bermed?
- 5. Are vehicles used to transport wastes to the land disposal or treatment site equipped with anti-spill equipment?
- 6. Does the facility use loading systems that minimize spills and fugitive losses such as dust or mists?
- 7. Are sediments or wastes prevented from being tracked offsite?
- 8. Is storm water runoff minimized from the land disposal site?

#### SUMMARY OF INDUSTRIAL WASTE MANAGEMENT AND OUTSIDE MANUFACTURING BMPs

- Conduct a waste reduction assessment.
- · Institute industrial waste source reduction and recycling BMPs.
- · Prevent runoff and runon from contacting the waste management area.
- Minimize runoff from land application sites.

#### **OUTSIDE STORAGE OF RAW MATERIALS, BY-PRODUCTS, OR FINISHED PRODUCTS**

Are materials protected from rainfall, runon, and runoff?

### SUMMARY OF BMPs FOR OUTSIDE STORAGE OF RAW MATERIALS, BY-PRODUCTS, OR FINISHED PRODUCTS

· Cover or enclose materials.

#### **SALT STORAGE**

- 1. Are salt piles protected from rain?
- 2. Is storm water runon prevented from contacting storage piles and loading and unloading areas?

#### **SUMMARY OF SALT STORAGE FACILITIES BMPs**

- Put salt under a roof.
- · Use temporary covers.
- Enclose or berm transfer areas.