

**PRESENTATION TO THE MID-
ATLANTIC EQUIPMENT
MANAGEMENT ASSOCIATION**

APRIL 9, 2013

Impact of New Maryland Storm Water General Permit

- Federal and State (Chesapeake Bay)
- Proposed in November of 2012
- Expect adoption during 2013
- Specifically addresses “Motor Freight Transportation Facilities”
- Difference between dedicated repair shops and “retail” operations
- SIC Codes 4212-4231

Permit Covers These Activities

- Fluid changes
- Mechanical repairs
- Parts cleaning
- Sanding, painting, and refinishing
- Fueling
- Storage of vehicles waiting for repairs
- Storage of related materials and waste (batteries, oil, fuel, tires, etc.)

What do You Need to Do?

- Submit application – NOI. This must be done within 90 days
- Develop a written Storm Water Pollution Prevention Plan (SWPPP) – also within 90 days
- Pay the fee!
- Begin implementing provisions of the Plan

Controversial

- Restore an area equal to 20% of your facility's impervious surface
- If facility was built since 2002 it already incorporates that standard
- MDE will accept an equivalent practice if it (or a combination of practices) result in the capture and treatment of 1" of rain

Controversial - 2

- A plan to implement restoration within six (6) months of obtaining coverage
- Complete the restoration project within 4 years

Pollutants Associated With Your Facilities

- Fueling – fuel, oil
- Vehicle maintenance – chlorinated solvents, oil, heavy metals, acids, ethylene glycol, detergents, salts, suspended solids
- Vehicle parking – hydraulic fluids, oil
- Painting – dust, paint solids, heavy metals
- Liquid storage – oil, grease, fuel

What Could be in the Plan?

- In general:
 - Good housekeeping practices
 - Minimize exposure
 - Erosion and sediment control
 - Management of runoff

Specific BMPs

- Fueling
 - Conduct fueling under cover
 - If uncovered, use containment
 - Use of drip pans
 - Have spill kit nearby
 - Control run-on and run-off
 - Protect tanks and dispensers

Specific BMPs

- Vehicle and equipment maintenance
 - Good housekeeping
 - Eliminate floor drains
 - Do parts cleaning at one location
 - Use drip pans, drain boards, drying racks
 - Proper transfer of used fluids
 - Use dry sorbent to clean drips and leaks
 - Minimize/eliminate hosing of floors
 - Label and track waste material
 - Keep the manifests!

Specific BMPs

- Vehicle and equipment maintenance
 - Minimize exposure
 - Clean (if possible) under cover
 - Watch the floor drains
 - Manage run-off
 - Berms, curbs, grassy areas
 - Know what is happening to your wash water
 - Inspections and training

Specific BMPs

- Outdoor vehicle and equipment storage and parking
 - Obviously try to store inside
 - Outside equipment provide a roof
 - Drip pans, sorbents
 - Regularly sweep

Specific BMPs

- Painting areas
 - Confine to a safe area
 - Enclose * check for air permits
 - Mix paints away from drains
 - Safely store paint
 - Recycle your paint
 - Low volatility solvents

Specific BMPs

- Vehicle washing
 - Confine washing to designated areas
 - Wash water to go to intended collection system
 - Phosphate-free biodegradable detergents
 - If possible, contain and recycle wash water

Specific BMPs

- Above ground storage tanks
 - COMAR 26.10.01
 - Federal SPCC requirements

State Oil Operations Permit

- An individual permit is required if a facility has either:
 - Used oil storage capacity in above ground tanks of 1,000 gallons or more, or,
 - Total above ground petroleum/oil storage capacity of 10,000 gallons or greater

SPCC Plans

- Federal requirement with significant penalties
- Applies to all facilities with 1,320 gallons or greater capacity.
- This includes all tanks and 55 gallon drums.

What is in an SPCC Plan?

- Think of it as a federal permit application for your tanks

Plan Specifics-1

- Information on tank design, construction and installation
 - How secondary containment is provided
 - Method of release detection
 - Description of vents
 - Discussion of piping
 - Method for protection against releases during transfer operations

Plan Specifics-2

- Discussion of “worst-case” release and response anticipated
- Spill response capability on-hand
- Contacts in case of a release

Inspections

- Storm water inspections 4 times a year – 3 are simple visuals, one is a visual along with a formal written assessment
- SPCC inspections monthly (simple, but a form should be filled out). Yearly a more formal written inspection
- An initial tank inspection by a certified tank inspector is needed

Questions?

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