

CPAC Meeting Comments on Elements 5 and 8 of the City's Initial Stormwater Management Plan



May 12, 2010

Meeting Date: May 4, 2010

General comments about program:

1. Where is enforcement in this plan?
2. Response: We will have it.
3. Where is a hotline or reporting line for people to call in?
4. Response: We are currently working on one. We will cover this requirement in a later meeting. This meeting is meant to focus on two specific parts of the plan, but the plan will cover much more than just these two parts.

Comments about Element 5 – Municipal Waste Treatment, Storage or Disposal Facilities Not Covered by an NPDES Stormwater Permit

1. The count is currently doing SWPPPs for Fire and EMS stations. They are currently doing annual inspections (the last one was done in March). There is a need to coordinate with Richland County on good housekeeping and record keeping.
2. How is the City trying to address spill prevention control countermeasure plans (SPCCs)? In Richland County's experience, it is better to include SPCCs with SWPPPs.
3. Response: The City will start with inspections first. We will likely suggest facilities cover any exposed materials first with secondary containment at least if that is not possible.
4. It would be good for the City to meet with Richland County to get advice/coordinate
5. Are the City's and Richland County's inspections similar?
6. Response: The City inspections will be based on DHEC forms (This tied into a discussion continued on Industrial Runoff)

Comments about Element 8 – Industrial Runoff

1. The City should coordinate with Lexington and Richland Counties on training.
2. Since every business needs a license, business license renewal letters may be an opportunity to alert businesses to upcoming inspections/ changes.
3. Nobody wants to "screw anything up" – i.e. most businesses will want to do the right thing, but they need to know what that is
4. Response: The City will need to start inspections soon. One of the things we will focus on is compliance assistance.

5. The City could use inspections as an opportunity to take pictures of what people are supposed to do and not supposed to do to help them understand requirements.
6. Response: There may be legal concerns with using pictures
7. The City may want to use incentives – a “good water” certificate may open doors and get people to invite the City in to see what might be missed on an inspection
8. Response: The City was considering something like that, but we may need to start it later.
9. “A little bit of sugar gets you a lot” – being helpful and friendly may get more help and compliance
10. Response: With the initial inspections, the inspector(s) will call and talk with the businesses first before showing up to do the inspection so it is not a surprise.
11. There may be a way to tie into the Green Business program.
12. Richland County said their goal for inspections was to inspect the stormwater system, not the entire facility.
13. Response: The City’s inspections will be limited to suspected runoff problems.
14. Richland County has found that at some facilities, inspector safety may require appointments (i.e. nuclear facilities).
15. There was a question about geography – if a company is based outside of the City but working within City limits, how will they be covered
16. Response: They will also be covered through illicit discharges
17. Response: Inspections will focus first on businesses physically located in the City.
18. What about restaurants? They use chemical cleaners.
19. Response: Fats oils and grease (FOG) are a concern
20. Response: The grease traps are covered by sewer regulations. We have FOG inspectors, and stormwater will coordinate with those inspectors.
21. What about landscapers? There are herbicide and fertilizer concerns.
22. The City may want to tie into air pollution concerns with the gas-powered equipment landscapers use.
23. Painters are also a concern.
24. What should people do with old varnish and paint? Most retailers and homeowners will have some paint.
25. What about trains?
26. Response: Trains will be a high priority, but they will require a lot of maps/ investigation. The City will need to work with the Bureau of Water (DHEC)
27. Trenches near train tracks lead to rivers and creeks.
28. On inspection forms, there was a suggestion to coordinate with Richland County to make it easier on businesses
29. There was also a suggestion that these forms be made available.
30. Richland County has separate forms for industrial and “high risk” facilities tied to business codes.
31. It was brought up again that it is important for the City and Richland County to work together. Why not use the County’s forms?
32. Response: People intuitively know what is going on; most of our work will be in gathering lists and starting inspections. Forms are only a small part of what needs to be done.

33. Much of what the City annexes is from Richland County – the City should make it easy on new businesses who were part of the County or businesses new to area to know what requirements are.
34. We asked what would be important to consider when working with the County
35. Consistency in goals and objectives is important.
36. Having training people say the same thing is important.
37. Response: It sounds like it is important that we clarify where you can find expectations and work with other jurisdictions where appropriate.
38. What about types of non-compliance? What is the timeframe?
39. Response: That depends on the problems. First comes an inspection, then a report, then a notice of violation.
40. Will the City be able to issue fines? DHEC gives notice after notice then says it can't fine.
41. Response: We will eventually. It is in the permit.
42. Response: Our goal is compliance, not punishment.
43. We asked what would help in contacting businesses.
44. Suggestions for videos/ podcasts of what they are supposed to do/ not do
45. Suggestion to be gentle
46. Maybe try Green Businesses first. Use them as a trial run/ pilot of inspections for that type of business.
47. Green Businesses could turn into champions for the new process if worked with.
48. From an enforcement perspective, start from hotspots first. The County prioritized hotspots based on proximity to water bodies.
49. Use press releases that market to business sectors, such as journals. Can also spotlight Green Businesses
50. Use radio talk shows like the Charles Campbell show or the South Carolina Business Review and give out phone number
51. Present at the Green Business conference
52. Use City Ch. 2

Comments after the meeting:

1. Terminology is important. Try “courtesy call” instead of “initial inspection.”
2. Follow up initial inspection with “was there anything I missed?” – businesses may point out issues particular to their type of business that an inspector might not have anticipated