

## **Industrial Storm Water Permit Frequently Asked Questions on No Exposure**

August 14, 2003

1. If I have scrap materials from my process such as old equipment and metal, can I store this outside?

Scrap material and old equipment may be stored outside as long as it is protected from storm water or storm water runoff. It must be covered and / or elevated to prevent storm water contact.

2. Can I store drums outside?

Drums and other containers may be stored outside as long as they are in good condition (not dented or rusted), tightly sealed, do not leak, and do not have operational valves or taps. Keep in mind they can only be stored outside, you cannot add to or take out of the drums while they are outdoors.

3. If I have a dumpster, collection bin, or garbage container outside can I still claim no exposure?

Outside dumpsters, collection bins or garbage cans must be covered (except when adding or removing waste) and be free of leaks in order to be stored outside and still claim no exposure.

4. The area where trucks deliver materials is not covered but all the work and storage areas are covered. Can I claim no exposure?

No. All activities including loading, unloading, transportation of final product or waste products must be covered or protected from storm water and storm water runoff. The exception would be waste areas such as dumpsters, collection bins, and garbage cans. (See question 3)

5. I use granite to make headstones. The granite is delivered and stored outside until I need it to make a headstone. Since the final intended purpose is for outside use can I claim no exposure?

No. The raw materials must be stored inside until the final product which is intended for outdoor use is completed.

6. The air stack on my building is the only item not protected from storm water. If I have an air permit which covers the stack can I still claim no exposure?

Roof stacks / vents do not cause a condition of exposure provided they are in compliance with other applicable environmental protection programs such as having an air permit. Deposits of particles or residuals from roof stacks / vents that aren't regulated and which could be mobilized by storm water runoff, are considered exposed. Roof stains from emissions, or visible particulate matter on the roof, are evidence that you don't meet the no exposure criteria.

7. I have some raw materials stored outside but they are covered by a shelter. Every so often we have high winds which may carry some of the raw materials off site. Does this affect the no exposure exclusion?

Yes. Wind blown raw materials cause a condition of exposure.

8. Can I use tarps to cover materials stored outside?

Under certain circumstances tarps may be used as temporary cover or shelter. Permitting authorities can determine the circumstances under which temporary structures will or will not meet the requirements of this section.

9. Is the No Exposure Certification form transferrable to a new facility operator?

No. If a new operator takes over your facility, the new operator must complete, sign, and submit a new form to claim the no exposure exclusion.

10. We had a small oil spill on a concrete pad outside. The oil was removed but left a stain. Would washing down the concrete put us out of compliance with the no exposure exclusion?

Concrete may be washed as long as all the spilled material is removed and you do not use detergents or other chemicals to wash down the concrete.

11. We wash down the building a couple of times a year with a pressure washer and the runoff water goes to the storm drain. Does this disqualify us from claiming the no exposure exclusion?

Not necessarily. There are a few non-storm water discharges such as washing buildings that are allowed and still let you claim no exposure. In this case, washing the building is allowed as long as detergents or other chemicals are not used.

12. We have two forklifts that move materials between buildings. The distance between the two buildings is minimal (less than 50 feet) Will this prevent us from obtaining a no exposure certification?

Vehicles moving between buildings will likely come into contact with precipitation at some time, but so long as they are adequately maintained they will not cause a condition of exposure. The materials being moved must be protected from precipitation.

13. Will my no exposure certification ever expire?

Yes. The current industrial storm water permit and its authorizations expire August 20, 2006. You will need to re-apply for the no exposure certification based on the new permit