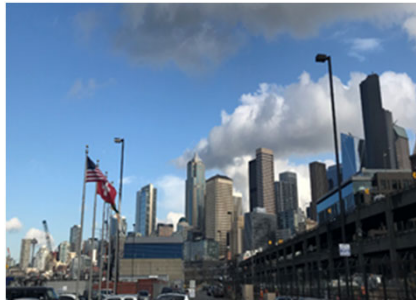


CALIFORNIA'S INDUSTRIAL GENERAL PERMIT (IGP) CONTAINER TERMINAL OPERATORS

PROPOSED CII PERMIT DISCUSSION



March 23, 2022

MEETING AGENDA

- **Introductions and overview of the stormwater monitoring group**
- **California's Industrial General Permit (IGP) and compliance requirements for container terminal operators**
- **Compliance approaches currently utilized by container terminal operators to comply with the IGP**
- **Proposed stormwater permit for commercial, industrial, and institutional facilities (CII Permit)**
- **Questions and discussion**

CONTAINER TERMINAL OPERATORS

- **GSI is managing a compliance group (Container Terminal Operators Compliance Group, CTOCG) that assists container terminal operators for day-to-day compliance for California Industrial General Permit.**
- **Group Members and Port Terminal Clients**
 - Six (6) members located in Port of Los Angeles and Port of Long Beach
 - Two (2) members located in Port of Oakland
- **Other marine terminal operators in California**



IGP APPLICABILITY FOR TERMINAL OPERATIONS

- CA IGP Attachment A – Transportation Facilities
 - Facilities with SICs 40XX through 45XX (except 4221-25) and 5171 with vehicle maintenance shops, equipment cleaning operations, or airport deicing operations.
- Not all portions of a transportation facility (water transportation SICs 44XX) require coverage
 - Only those portions of the facility involved in vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication) or other operations identified under the IGP as associated with industrial activity.
- General Industrial Activity Areas:
 - Maintenance & Repair
 - Power Shops
 - Crane Shops
 - Fueling areas
 - Wash racks
 - Chassis Shops



FOOTPRINTS OF PORT TERMINALS AND INDUSTRIAL ACTIVITY AREAS

CA Port Terminals	Industrial Activity Area (acres)
1	5.4
2	4.7
3	7.0
4	5.8
5	7.0
6	9.7
7	24
8	5.0

Washington State experience: Massive Drainage Areas – Stormwater Treatment Cost

- Assumption: 100 acres site and is required to treat 91% of the total site stormwater discharges
- Estimated costs vary depending on:
 - Conveyance alternatives
 - Treatment system alternatives
- Initial Capital Costs
 - Range from \$10M to \$20M +
- Annual O&M Costs
 - \$30K +



Typical Terminal BMPs

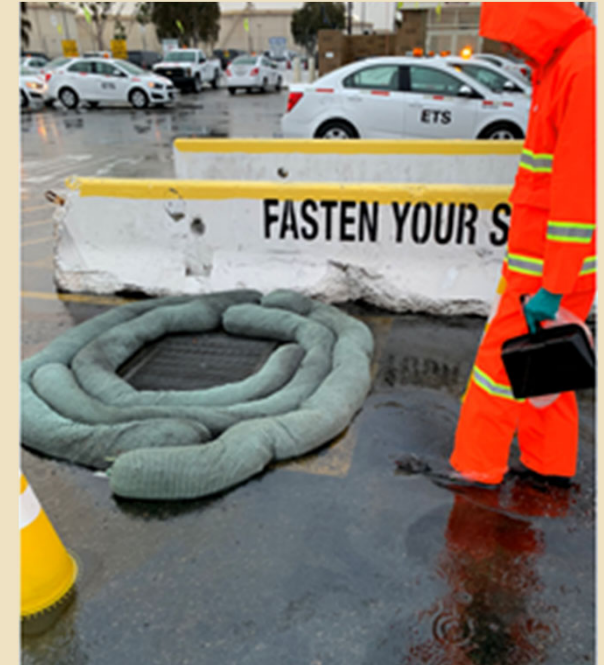
TYPICAL BMPS IMPLEMENTED BY CTOCG MEMBERS

- Limit industrial activity areas, isolate areas of industrial activity, prevent run-on from adjacent roads and areas with significant truck traffic
- Improve Housekeeping
- Implement More Intense and Comprehensive Sweeping
 - Regenerative Sweeper
 - Site-Specific Sweeping Plan
- Inspection
- Source Reduction
 - Investigation
 - Conduct operations under cover
 - Store materials under cover
 - Spill prevention
 - Coating of galvanized materials
- Repair and seal pavement
- Pressure washing



ADVANCED BMPS

- Socks or wattles containing filter media
- Gravity flow through filter media bed
- Determine Media
 - Based on target pollutants
 - Media commercially available
 - Testing to prove effectiveness
- Even with improvements, several clients decided to move forward with more advanced BMPs:
 - An advanced stormwater treatment system
 - Capture and reuse stormwater
- Infiltration is not feasible:
 - Depth to groundwater in ports is typically less than 10 feet.



ONGOING BMP IMPROVEMENTS

ADVANCED STORMWATER TREATMENT SYSTEM



ONGOING BMP IMPROVEMENTS RAINWATER HARVESTING PROJECT

- **Hydrologic Modeling**

- Target 85% percentile, 24-hour storm event

Los Angeles Times

California wastes most of its rainwater, which simply goes down the drain



“When you look at the Los Angeles River being between 50% and 70% full during a storm, you realize that more water is running down the river into the ocean than what Los Angeles would use in close to a year.”

Mark Gold

Associate Vice Chancellor for environment and sustainability at UCLA

For the record:

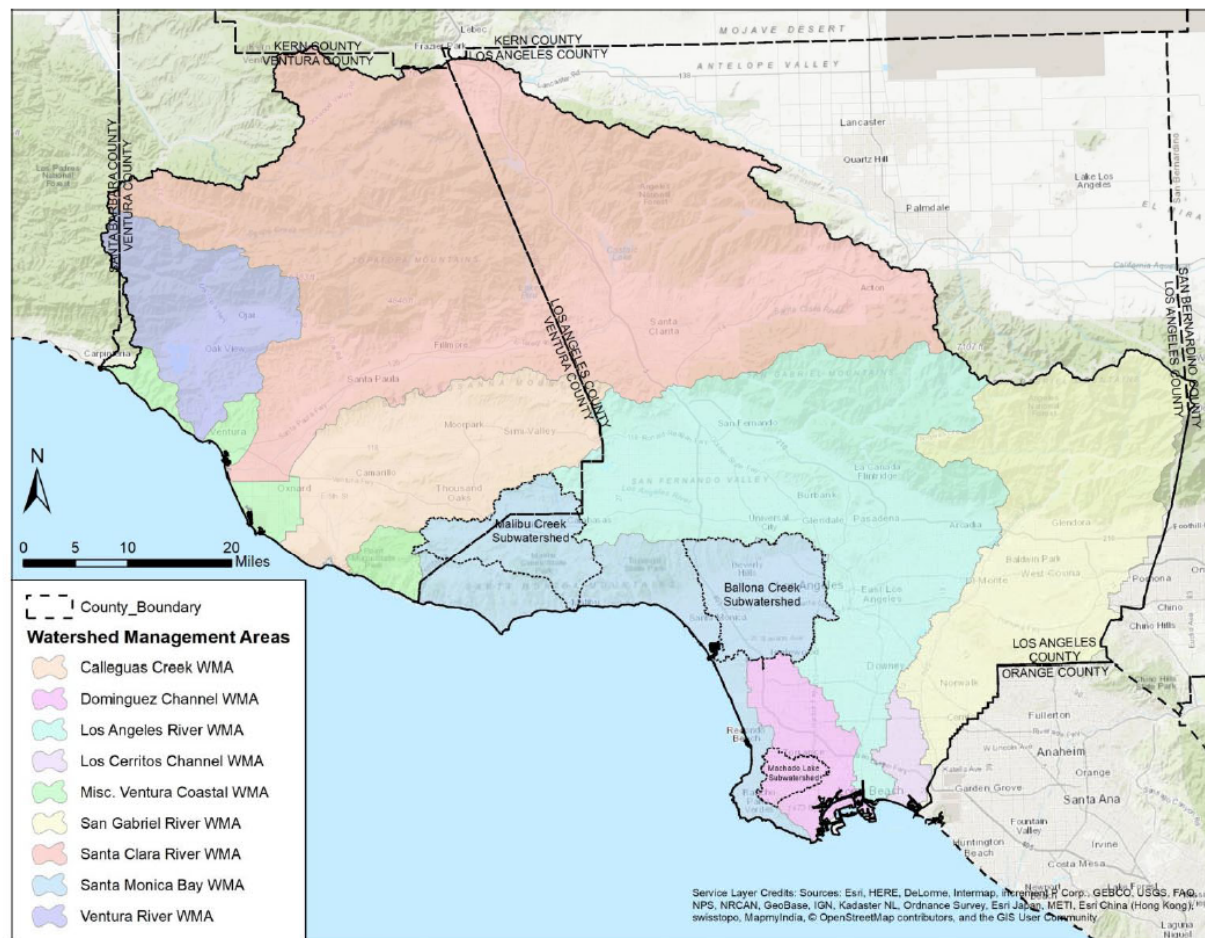
8:05 a.m. Feb. 20, 2019: An earlier version of this article said the Los Angeles Department of Water and Power captured 22 billion gallons of water during the most recent storm. In fact, the Los Angeles County Department of Public Works has captured that amount in the storms since Oct. 1, the most recent water year.

LA
Times

CI Discussion

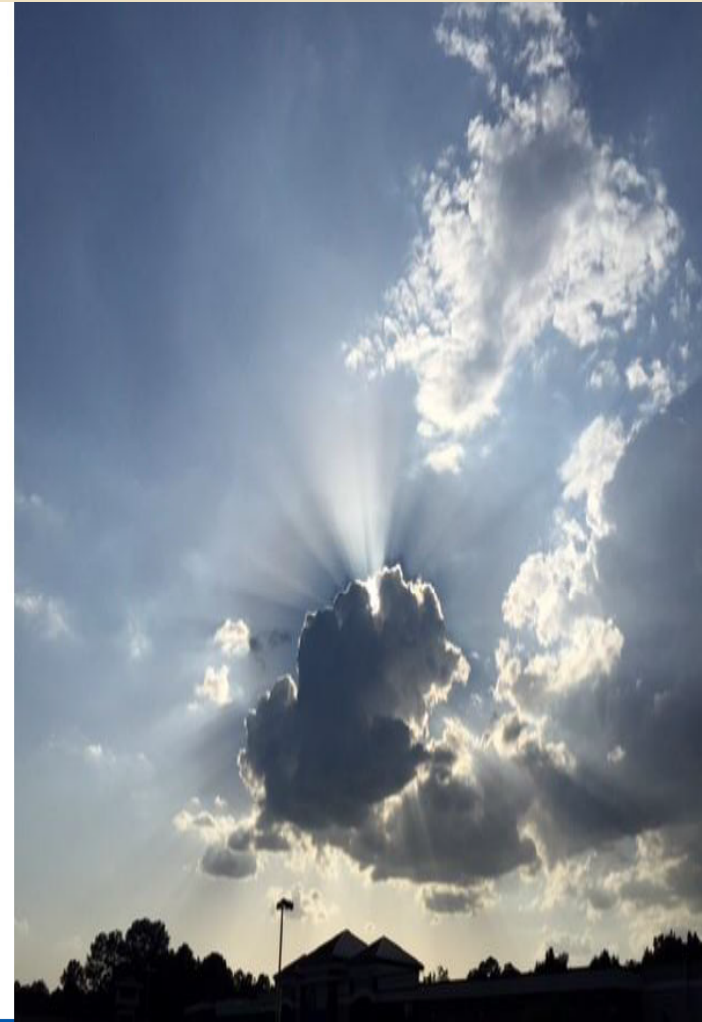
Los Angeles Regional Water Quality Control Board

- One of 9 regional boards in the California Water Boards
- Coastal watersheds of Los Angeles and Ventura Counties
- NPDES permit authority
- Additional authority under Division 7 of the California Water Code, State Water Board plans and policies, and Basin Plan



CII Permit Considerations

- Coordination between Los Angeles Water Board, USEPA, State Water Board, and stakeholders
- Permit limited to two watersheds
- General permit for all CII facilities
 - Individual permittees enroll under general permit
 - Enrollment package specific to each permittee



Potential Permit Requirements

- Enroll via Stormwater Multiple Application and Report Tracking System (SMARTS)
- Pay fees
- Prohibit discharges during dry weather
- Conduct monitoring and reporting
- Implement controls to reduce pollutants in stormwater
- Meet numeric limits for stormwater
- Reasonable enrollment dates and date(s) for compliance

Potential Compliance Options for Numeric Limits

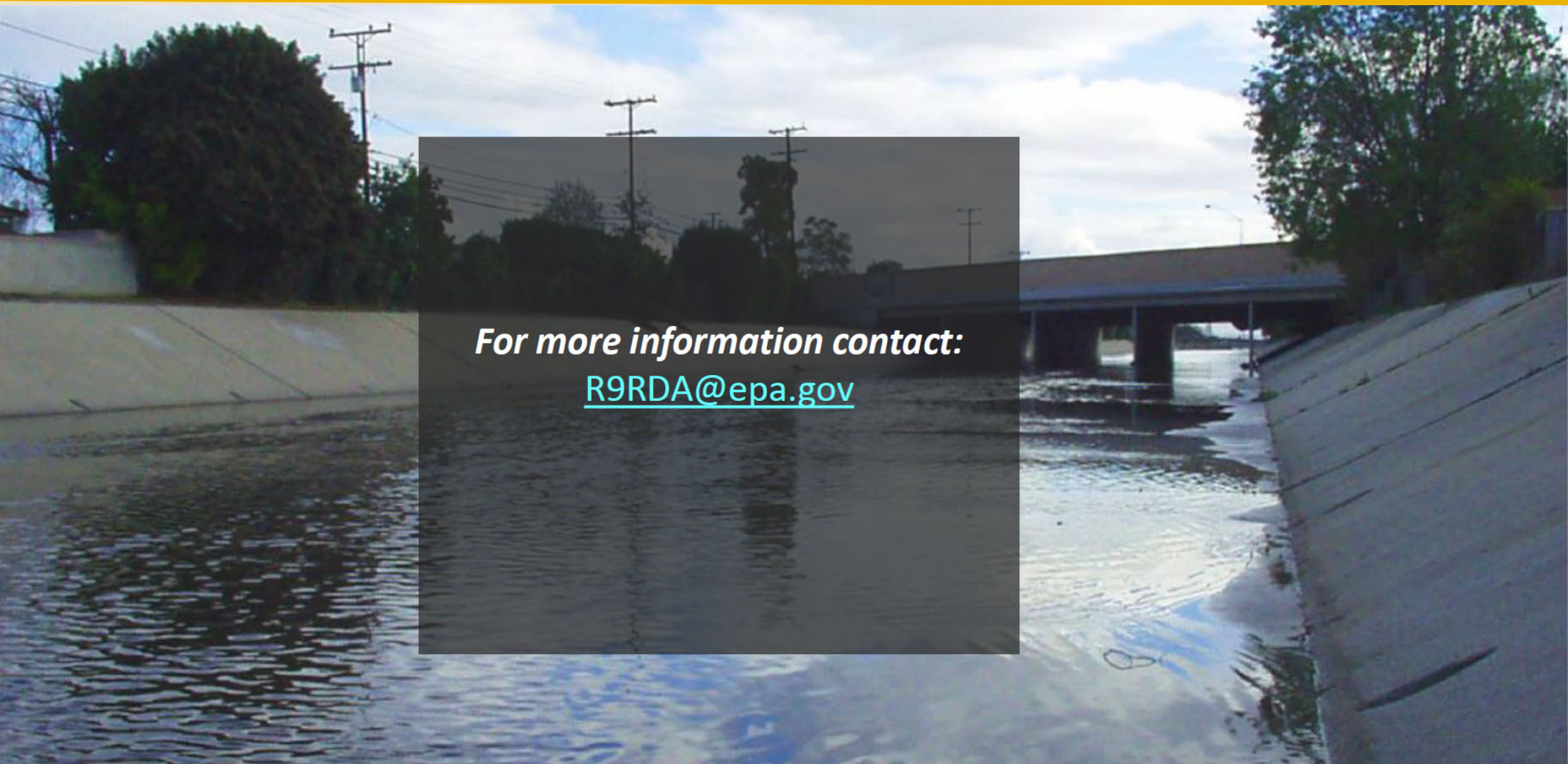
- Onsite compliance with numeric limits
- Onsite capture and use, infiltration, or evapotranspiration of runoff produced by the 85th percentile 24-hour storm
- Agreement with local watershed management group to help fund watershed management program



Next Steps



- Ongoing coordination between USEPA, Los Angeles Water Board, and State Water Board
- December: Public meetings with stakeholders, including potential permittees
- Spring 2022: Simultaneously notice draft permit and draft designation for public comment
- Spring 2022: Potential workshops
- Spring/Summer 2022: USEPA final designation and Los Angeles Water Board adoption hearing



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QUESTIONS AND DISCUSSION



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