



Unpermitted Industria Stormwater Facilities

Defining the Problem

Groundwater is a water of the State in Utah

• Most sites discharge to a water of the State

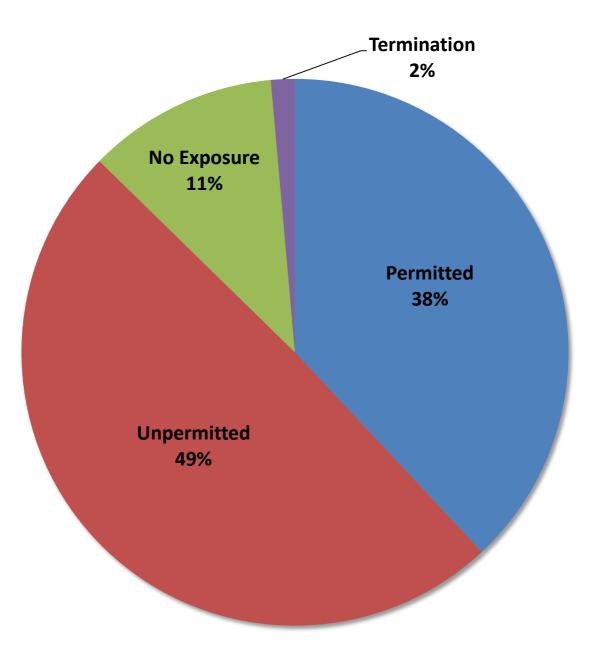
Current universe

- ~700 fully permitted facilities
- 35 No Discharge facilities
- 194 No Exposure facilities

Slowly identifying more

- 72 Inspections completed FY 2019
- Almost half were unpermitted

Many have never heard of the MSGP



FY 2019 Industrial Stormwater Inspection Types

Locating Unpermitted Facilities

People/Programs

- Municipalities (MS4 and non-MS4)
- DNR DOGM
- Pretreatment Program

Databases

- EPA Envirofacts
- Workforce Services

How to Target

- Location based
- Sector based

Municipalities (MS4s and non-MS4s)

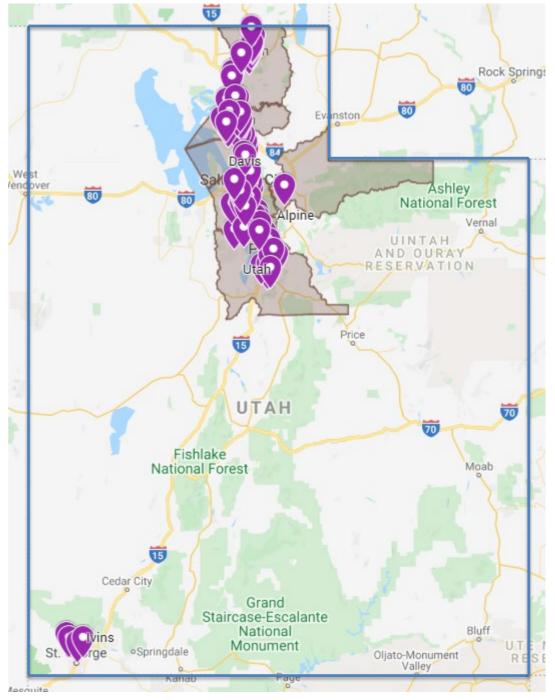
Only Salt Lake City is required to conduct industrial stormwater inspections (Phase I).

Possibly have SIC codes listed on business licenses.

Non-MS4s often less responsive and less likely to reach out.

Many municipalities do not understand who needs a permit

- Develop fact sheet for industrial
- Involve them in industrial inspections



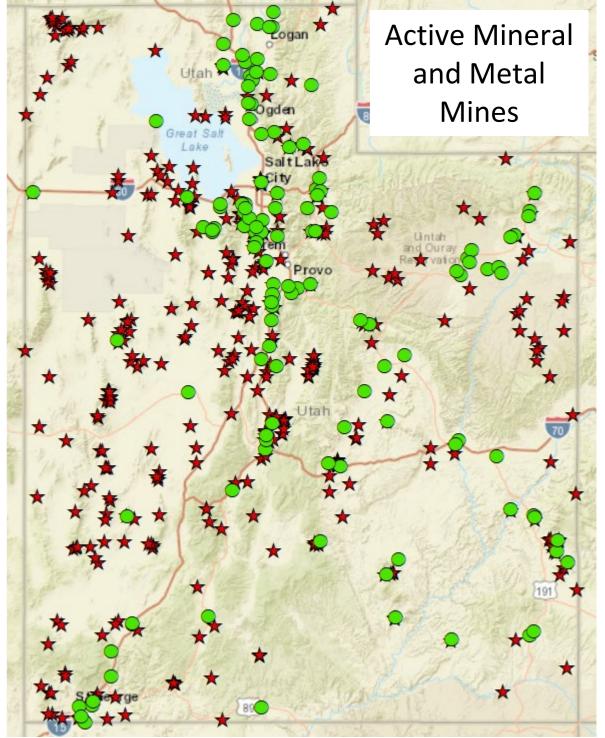


Department of Natural Resources (DNR) Division of Oil Gas and Mining (DOGM)

Significant amount of sites permitted by DOGM without MSGP coverage.

Coordinating meetings with new/expanding permittees.

Combined inspections.





Pretreatment Program - DWQ

Lots of overlap in the types of SIC codes that require permitting

Limited to areas with pretreatment programs (often larger POTWs)

Annual reports list SIC codes

| | Industrial User | Address | Local Limit(s) | SIC Code(s) | CIU, SIU or IU | Description | Flow in per day Total Proces | gallons y (gpd) ^{Average} Facility | Streamlining Options | Inspection Completed During Reporting Year |
|---|--------------------|--------------------------------|---------------------|----------------|-------------------|---|---------------------------------------|--|-------------------------|---|
| 1 | Products Group | 1025 West 1700 North, Logan | O&G, Metals & CN | 3479, 3823 | 433 | Metal Finishing & Phosphate Coating | 25 gallon per process | 1717 to 10,000 | N/A | Yes |
| 2 | Baicor | 1895 North 600 West, Logan | No Discharge | 2875 | 418 | Fertilizer Mixing & Blending | No Discharg e | 1988 | N/A | Yes |



Databases

EPA Envirofacts

- <u>https://enviro.epa.gov/facts/multisystem.html</u>
- Searches multiple databases
- Typically bigger facilities or ones that have already obtained a permit
- Can search by SIC code

Department of Workforce Services

- https://jobs.utah.gov/jsp/firmfind/#/industrysearch
- Lists all companies covered by Employment Security Act (unemployment benefits)
- ~58,000 listed
- ~6,000 fall under a permitted sector based on NAICS
- Questionable codes



How to Target – Location vs Type

By Location

- Streamline travel
- Does my neighbor have to do this?
- Easy to involve local municipalities

By Industry Type

- Educate on changes that are sector specific
- Allows for information gathering on sector specific issues

Both help find smaller companies that may be difficult to locate relying on complaints and tips



Next Steps for Utah

Focus on concrete batch plants – address unlined washout concerns

DOGM meetings for larger mines of concern and new mines

Focus on specific municipalities with MS4 contacts/pretreatment lists/workforce list

See what works best



Questions?

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