

**Frequently Asked Questions**  
**City of Richmond businesses receiving stormwater specific permits**  
**2010-2011 fiscal year**

**Why is the City issuing stormwater specific permits?**

On October 14, 2009 the Regional Water Quality Control Board adopted the Municipal Regional Stormwater National Pollution Discharge Elimination System (NPDES) Permit CAS612008. This permit addresses pollutants and their impact on receiving waters. Portion C.4.b in this permit requires the City of Richmond to have an industrial and commercial inspection plan that is significantly more detailed and requires more comprehensive industrial and commercial site controls. The City will issue permits to industrial and commercial sites to ensure that they implement best management practices (BMPs) needed to protect water quality.

**Who will be required to obtain a stormwater permit?**

The City will issue permits to businesses whose outdoor activities and equipment could reasonably be considered to cause or contribute to pollution of stormwater runoff. The municipal stormwater NPDES permit considers the following specific functional aspects as activities with pollution producing potential:

- a) Outdoor process and manufacturing areas
- b) Outdoor material storage
- c) Outdoor waste storage and disposal areas
- d) Outdoor vehicle and equipment storage and maintenance areas
- e) Outdoor wash areas
- f) Outdoor drainage from indoor areas
- g) Rooftop equipment (ill maintained equipment can contribute oil and rust)
- h) Other sources determined by the Permittee (City of Richmond) or Water Board to have a reasonable potential to contribute pollution to stormwater runoff

The NPDES permit also lists specific business types:

- a) Industrial facilities as defined at 40 CFR 122.26(b)(14), including those subject to the State General NPDES Permit for Stormwater Discharges Associated with Industrial Activity (hereinafter the Industrial General Permit)
- b) Vehicle salvage yards
- c) Metal recycled materials collection facilities and waste transfer facilities
- d) Vehicle mechanical repair, maintenance, fueling, or cleaning
- e) Building trades central facilities or yards, corporation yards
- f) Nurseries and green houses
- g) Building material retailers and storage
- h) Plastic manufactures
- i) Other facilities designated by the Permittee (City of Richmond) or Water Board to have a reasonable potential to contribute pollution to stormwater runoff

### **What if the business already has its own NPDES Permit?**

Businesses issued a NPDES permit with stormwater components and designated monitoring points covering all discharges from its business will not be issued a City stormwater permit.

### **What if a business already has a Notice of Intent (NOI) to comply with a State general storm water permit?**

A Notice of Intent (NOI) to comply with the State general stormwater permits are not city stormwater permits. The annual NOI fees support the State's oversight and monitoring program. The Municipal Regional Stormwater NPDES Permit CAS612008 requires the City of Richmond to permit and inspect businesses that are NOI facilities. The City is responding to this requirement by instituting a cost recovery fee based inspection program.

### **What is the stormwater management program charge that appears on my tax bill?**

The current storm water parcel tax fee is for stormwater infrastructure maintenance and the city's ongoing stormwater pollution prevention activities.

### **What are permitted business required to do?**

They will be required to implement best management practices (BMP's) to ensure pollutants are not discharged into the stormwater collection system or water bodies within the City's limits.

### **What are the proposed city stormwater permit and inspection fees?**

The City's master fee schedule includes a commercial and an industrial storm water permit fee. This is not a new requirement for businesses. The program will be more comprehensive and include more business inspections, pollutant monitoring, trash abatement, and expanded public outreach.

Commercial stormwater permit fee = \$432

Industrial stormwater permit fee = \$864

Site inspection fee = \$216 (one inspection and one follow-up covered in the cost of the permit)

Violation site visit inspection fee = \$695 (includes monitoring sampling and testing)

### **Why is the staff proposing an ordinance and master fee schedule change?**

Staff is requesting internal administrative changes to separate stormwater and wastewater revenue for budgeting purposes.

### **What determines whether a business is industrial or commercial?**

Businesses with a Notice of Intent to comply with the State General Industrial Permit (NOI) or designated SIC code listed in the Code of Federal Regulation will be designated industrial. A list can be found that defines Industrial facilities at 40 CFR 122.26(b) (14). Since these industries' inspections are more complicated, staff is proposing a higher fee than for commercial businesses.

Business not needing to obtain a NOI (SIC codes not listed 40 CFR 122.26(b) (14)) will be designated commercial.

### **How will the permit be assessed?**

A business entity will be assessed a stormwater permit fee that will be entered into the County tax roles along with the stormwater parcel fee. Permits will be issued one per business with contiguous parcels. If a business has parcels that are nearly contiguous, business may be issued only one permit based on business address and similar activity.

Industrial facilities with separate NOI's or stormwater pollution prevention plans (SWPPP's) would be issued separate permits because of the additional time it takes to inspect such facilities and prepare required reports.

### **How did staff come up with the proposed permit and inspection fees?**

The permit costs are based on the city's actual costs of issuing permits, conducting inspections, and follow-up required. The fee amount assumes that one inspection and one brief follow-up would be conducted biennially. Historically, industries and commercial businesses can stay in compliance with biennial inspections. Those businesses needing more full inspections could be assessed an additional inspection fee. The permit fee is not calculated to generate revenues for other programs required in the municipal permit or infrastructure maintenance costs.

### **What would an inspection include?**

Municipal Regional Stormwater NPDES Permit requires inspections to determine compliance with the City ordinances and permit. This includes:

- a) visual observations for evidence of unauthorized discharges, illicit connections, and potential discharge of pollutants to stormwater
- b) discussion of stormwater runoff pollution or illicit discharge prevention by implementing best management practices (BMP's)
- c) verification of compliance with ordinances
- d) verification of coverage under the Industrial General permit if applicable