What is the NPDES stormwater permitting program for industrial activity?

Activities, such as material handling and storage, equipment maintenance and cleaning, industrial processing or other operations that occur at industrial facilities are often exposed to stormwater. The runoff from these areas may discharge pollutants directly into nearby waterbodies or indirectly via storm sewer systems, thereby degrading water quality.

In 1990, the U.S. Environmental Protection Agency (EPA) developed permitting regulations under the National Pollutant Discharge Elimination System (NPDES) to control stormwater discharges associated with eleven categories of industrial activity. As a result, NPDES permitting authorities, which may be either EPA or a state environmental agency, issue stormwater permits to control runoff from these industrial facilities.

What types of industrial facilities are required to obtain permit coverage?

This fact sheet specifically discusses stormwater discharges from automobile salvage yards as defined by Standard Industrial Classification (SIC) and includes battery reclaimers, salvage yards, and automobile recyclers (Primary SIC 5015). Facilities and products in this group fall under the following categories, all of which require coverage under an industrial stormwater permit:

- Activities related to dismantling of used motor vehicles for the purpose of selling parts
- Wholesale or retail distribution of used motor vehicle parts

What does an industrial stormwater permit require?

Common requirements for coverage under an industrial stormwater permit include development of a written stormwater pollution prevention plan (SWPPP), implementation of control measures, and submittal of a request for permit coverage, usually referred to as the Notice of Intent or NOI. The SWPPP is a written assessment of potential sources of pollutants in stormwater runoff and control measures that will be implemented at your facility to minimize the discharge of these pollutants in runoff from the site. These control measures include site-specific best management practices (BMPs), maintenance plans, inspections, employee training, and reporting. The procedures detailed in the SWPPP must be implemented by the facility and updated as necessary, with a copy of the SWPPP kept on-site. The industrial stormwater permit also requires collection of visual, analytical, and/or compliance monitoring data to determine the effectiveness of implemented BMPs. For more information on EPA’s industrial stormwater permit and links to State stormwater permits, go to [www.epa.gov/npdes/stormwater](http://www.epa.gov/npdes/stormwater) and click on “Industrial Activity.”
What pollutants are associated with my facility’s activities?

Pollutants conveyed in stormwater discharges from automobile salvage yards will vary. There are a number of factors that influence to what extent industrial activities and significant materials can affect water quality.

- Geographic location
- Topography
- Hydrogeology
- Extent of impervious surfaces (i.e., concrete or asphalt)
- Type of ground cover (e.g., vegetation, crushed stone, or dirt)
- Outdoor activities (e.g., material storage, loading/unloading, vehicle maintenance)
- Size of the operation
- Type, duration, and intensity of precipitation events

The activities, pollutant sources, and pollutants detailed in Table 1 are commonly found at automobile salvage yards.

Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Automobile Salvage Yards

<table>
<thead>
<tr>
<th>Activity</th>
<th>Pollutant Source</th>
<th>Pollutant</th>
</tr>
</thead>
<tbody>
<tr>
<td>Vehicle Dismantling</td>
<td>Oil, anti-freeze, batteries, gasoline, diesel fuel, hydraulic fluids, electrical switches</td>
<td>Oil and grease, ethylene glycol, heavy metals, mercury</td>
</tr>
<tr>
<td>Used Parts Storage</td>
<td>Batteries, chrome bumpers, wheel balance weights, tires, rims, filters, radiators, catalytic converters, engine blocks, hub caps, doors, drivelines, galvanized metals, mufflers</td>
<td>Sulfuric acid, galvanized metals, oil and grease, heavy metals, petroleum hydrocarbons, total suspended solids (TSS)</td>
</tr>
<tr>
<td>Outdoor Vehicle and Equipment Storage</td>
<td>Leaking engines, chipping/corroding bumpers, chipping paint, galvanized metal</td>
<td>Oil and grease, arsenic, organics, heavy metals, total suspended solids (TSS)</td>
</tr>
<tr>
<td>Vehicle and Equipment Maintenance</td>
<td>Parts cleaning</td>
<td>Chlorinated solvents, oil and grease, heavy metals, acid/alkaline wastes</td>
</tr>
<tr>
<td>Waste disposal of greasy rags, oil filters, batteries, hydraulic fluids, transmission fluids, radiator fluids, degreasers</td>
<td>Oil, heavy metals, chlorinated solvents, acid/alkaline wastes oil, heavy metals, chlorinated solvents, acid/alkaline wastes, ethylene glycol</td>
<td></td>
</tr>
<tr>
<td>Spills of oil, degreasers, hydraulic fluids, transmission fluid, and radiator fluids</td>
<td>Oil, arsenic, heavy metals, organics, chlorinated solvents, ethylene glycol</td>
<td></td>
</tr>
<tr>
<td>Fluids replacement, including oil, hydraulic fluids, transmission fluid, and radiator fluids</td>
<td>Oil, arsenic, heavy metals, organics, chlorinated solvents, ethylene glycol</td>
<td></td>
</tr>
<tr>
<td>Vehicle, Equipment, and Parts Washing Areas</td>
<td>Washing and steam cleaning waters</td>
<td>Oil and grease, detergents, heavy metals, chlorinated solvents, phosphorus, salts, suspended solids</td>
</tr>
<tr>
<td>Liquid Storage in Above Ground Storage Tanks</td>
<td>External corrosion and structural failure</td>
<td>Fuel, oil and grease, heavy metals, materials being stored</td>
</tr>
<tr>
<td>Installation problems</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Spills and overfills due to operator error</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Illicit Connection to Storm Sewer</td>
<td>Sanitary water</td>
<td>Bacteria, biochemical oxygen demand (BOD), suspended solids</td>
</tr>
<tr>
<td>Floor drains</td>
<td>Oil and grease, heavy metals, chlorinated solvents, fuel, ethylene glycol</td>
<td></td>
</tr>
<tr>
<td>Vehicle washwaters</td>
<td>Oil and grease, detergents, metals, chlorinated solvents, phosphorus, suspended solids</td>
<td></td>
</tr>
<tr>
<td>Radiator flushing wastewater</td>
<td>Ethylene glycol</td>
<td></td>
</tr>
<tr>
<td>Leaking underground storage tanks</td>
<td>Materials stored or previously stored</td>
<td></td>
</tr>
</tbody>
</table>

Note: Activities may have additional pollutant sources that contain PFAS and can come into contact with stormwater discharges. Per- and polyfluoroalkyl substances (PFAS) are a group of man-made chemicals that include PFOA, PFOS, GenX, and many other chemicals.
**What BMPs can be used to minimize contact between stormwater and potential pollutants at my facility?**

A variety of BMP options may be applicable to eliminate or minimize the presence of pollutants in stormwater discharges from automobile salvage yards. You will likely need to implement a combination or suite of BMPs to address stormwater runoff at your facility. Your first consideration should be for pollution prevention BMPs, which are designed to prevent or minimize pollutants from entering stormwater runoff and/or reduce the volume of stormwater requiring management. Prevention BMPs can include regular cleanup, collection and containment of debris in storage areas, and other housekeeping practices, spill control, and employee training. It may also be necessary to implement treatment BMPs, which are engineered structures, intended to treat stormwater runoff and/or mitigate the effects of increased stormwater runoff peak rate, volume, and velocity. Treatment BMPs are generally more expensive to install and maintain and include oil-water separators, wet ponds, and proprietary filter devices.

The management practices discussed herein are well suited mechanisms to prevent or control the contamination of stormwater discharges associated with automobile salvage yards. In general, it is important to develop a stormwater management policy statement, review the policy with employees, and keep it posted. Additionally, identifying weaknesses in current facility practices will aid the permittee in determining appropriate BMPs that will achieve a reduction in pollutant loadings.

All facilities should implement BMPs in the following areas of the site:

- Vehicle dismantling and maintenance areas
- Vehicle, parts, and equipment storage areas
- Material storage areas
- Vehicle, parts, and equipment cleaning areas

Mercury switch used in vehicle. Be aware: specific permit requirements may vary according to permitting authority so it is important to reference the requirements applicable of the state in which your facility is located. For instance, many states are now addressing the issue of mercury switch removal to prevent mercury releases that occur from automobile recycling. Mercury switches have been used until recently for hood, trunk, or door lights.

BMPs must be selected and implemented to address the following:

**Good Housekeeping Practices**

Good housekeeping is a practical, cost-effective way to maintain a clean and orderly facility to prevent potential pollution sources from coming into contact with stormwater. It includes establishing protocols to reduce the possibility of mishandling materials or equipment and training employees in good housekeeping techniques. Common areas where good housekeeping practices should be followed include trash containers and adjacent areas, material storage areas, vehicle and equipment maintenance areas, and loading docks. Good housekeeping practices must include a schedule for regular pickup and disposal of garbage and waste materials and routine inspections of drums, tanks, and containers for leaks and structural conditions. Practices also include containing and covering garbage, waste materials, and debris. Involving employees in routine monitoring of housekeeping practices has proven to be an effective means of ensuring the continued implementation of these measures. Industrial facilities can conduct activities that use, store, manufacture, transfer, and/or dispose of PFAS containing materials. Successful good housekeeping practices to minimize PFAS exposure to stormwater could include inventorying the location, quantity, and method of storage; using properly designed storage and transfer techniques; providing secondary containment around chemical storage areas; and using proper techniques for cleaning or replacement of production systems or equipment.
Minimizing Exposure
Where feasible, minimizing exposure of potential pollutant sources to precipitation is an important control option. Minimizing exposure prevents pollutants, including debris, from coming into contact with precipitation and can reduce the need for BMPs to treat contaminated stormwater runoff. It can also prevent debris from being picked up by stormwater and carried into drains and surface waters. Examples of BMPs for exposure minimization include covering materials or activities with temporary structures (e.g., tarps) when wet weather is expected or moving materials or activities to existing or new permanent structures (e.g., buildings, silos, sheds). Even the simple practice of keeping a dumpster lid closed can be a very effective pollution prevention measure. Another example could include locating PFAS-containing materials and residues away from drainage pathways and surface waters.

Erosion and Sediment Control
BMPs must be selected and implemented to limit erosion on areas of your site that, due to topography, activities, soils, cover, materials, or other factors are likely to experience erosion. Erosion control BMPs such as seeding, mulching, and sodding prevent soil from becoming dislodged and should be considered first. Sediment control BMPs such as silt fences, sediment ponds, and stabilized entrances trap sediment after it has eroded. Sediment control BMPs should be used to back-up erosion control BMPs.

Management of Runoff
Your SWPPP must contain a narrative evaluation of the appropriateness of stormwater management practices that divert, infiltrate, reuse, or otherwise manage stormwater runoff so as to reduce the discharge of pollutants. Appropriate measures are highly site-specific, but may include, among others, vegetative swales, collection and reuse of stormwater, inlet controls, snow management, infiltration devices, and wet retention measures. Incorporating treatment like granular activated carbon may be helpful to remove certain pollutants like PFAS.

A combination of preventive and treatment BMPs will yield the most effective stormwater management for minimizing the offsite discharge of pollutants via stormwater runoff. Though not specifically outlined in this fact sheet, BMPs must also address preventive maintenance records or logbooks, regular facility inspections, spill prevention and response, and employee training.

Specific runoff management practices for automobile salvage facilities include the installation/use of:

- Berms or drainage ditches on the property line (to prevent run-on from neighboring properties
- Berms for uncovered outdoor storage of soiled parts, engine blocks, and above-ground liquid storage
- Detention ponds
- Filtering devices and oil/water separators

All BMPs require regular maintenance to function as intended. Some management measures have simple maintenance requirements, others are quite involved. You must regularly inspect all BMPs to ensure they are operating properly, including during runoff events. As soon as a problem is found, action to resolve it should be initiated immediately.

Implement BMPs, such as those listed below in Table 2 for the control of pollutants at automobile salvage yards, to minimize and prevent the discharge of pollutants in stormwater. Identifying weaknesses in current facility practices will aid the permittee in determining appropriate BMPs that will achieve a reduction in pollutant loadings. BMPs listed in Table 2 are broadly applicable to automobile salvage yards; however, this is not a complete list and you are recommended to consult with regulatory agencies or a stormwater engineer/consultant to identify appropriate BMPs for your facility.
<table>
<thead>
<tr>
<th>Activity</th>
<th>BMPs</th>
</tr>
</thead>
</table>
| Dismantling and vehicle maintenance | Minimize exposure  
- Installation of a consolidated processing area, including a covered and bermed impermeable concrete surface equipped with a drain, where all fluids are drained.  
**Fluid and Parts Removal**  
- Drain all fluids from vehicles upon arrival at the site. Segregate the fluids and properly store or dispose of them.  
- Drain oil filters (and all vehicle parts) before disposal or recycling.  
- Inspect vehicles for leaks as soon as possible once they arrive on-site. Inspect vehicles quarterly for signs of leakage. Check for unwanted material that could have been placed in the vehicle.  
- When pulling parts from vehicles in the yard, employ a catch sled or tray to recover the majority of fluids which will be released. Place drip pans, large plastic sheets, or canvas under vehicles or equipment during maintenance and dismantling activities. Where drip pans are used, they should not be left unattended to prevent accidental spills.  
- Engine oil should be drained and stored in clearly labeled tanks or containers. Tanks and containers must be kept in good operating condition, free of any visible spills or leaks, structural damage, or deterioration.  
- Remove battery as soon as feasible after vehicle enters the facility.  
- Promptly transfer used fluids to the proper container.  
- Empty and clean drip pans and containers; do not leave full drip pans or other open containers around the shop.  
- Remove all mercury switches as soon as possible making sure not to puncture the mercury container during removal. Ship switches to End of Life Vehicle Solutions (ELVS).  
**Vehicle Processing**  
- Maintain an organized inventory of materials used in the maintenance shop.  
- Designate one person to keep track of parts in the yard. As soon as a hulk is salvaged to its minimum extent, it should be processed for shredding to minimize the dripping of fluids and clutter in the yard.  
**Material Storage**  
- Nonhazardous substances that are contaminated with a hazardous substance are considered a hazardous substance.  
- Store cracked batteries in a nonleaking secondary container.  
- Keep waste streams separate (e.g., waste oil and mineral spirits).  
**Recycling and Disposal**  
- Recycle anti-freeze, gasoline, used oil, mineral spirits, windshield washer fluid, and solvents.  
- Label and track the recycling of waste material (e.g., used oil, spent solvents, and batteries).  
- Dispose of greasy rags, oil filters, air filters, batteries, spent coolant, and degreasers properly.  
**Discharges**  
- Know where your sumps and drains discharge to. Do not pour liquid waste down floor drains, sinks, or outdoor storm drain inlets.  
- Plug floor drains that are connected to the storm or sanitary sewer. If necessary, install a sump that is pumped regularly.  
- Screen out sludges and solids before they reach the waste sump. Use an absorbent pad around the perimeter of sumps to prevent unwanted hazardous materials from entering.  
- Prohibit the practice of hosing down the shop floor, using dry cleanup methods, and/or collecting the stormwater runoff from the maintenance area and providing treatment.  
- Treat stormwater discharges with devices such as oil-water separators.
<table>
<thead>
<tr>
<th>Activity</th>
<th>BMPs</th>
</tr>
</thead>
</table>
| **Outdoor vehicle, equipment, and parts storage** | Minimizing Exposure  
- Cover all storage areas with a permanent cover (e.g., roofs) or temporary cover (e.g., canvas tarps).  
- Store lead parts in a covered container that is capable of handling the excessive weight of lead. If storing lead tire weights with batteries, make sure weights are not placed under batteries or allowed to roll around as that could puncture batteries.  
Runoff Minimization  
- Install curbing, berms, or dikes around storage areas.  
- Install berms or drainage ditches on the property line.  
- Install berms for uncovered outdoor storage of oily parts, engine blocks, and above ground liquid storage.  
- Install filtering devices and oil/water separators.  
- Use drip pans, large sheets of plastic, or canvas under all vehicles and equipment waiting for and during maintenance.  
- Store mercury switches in covered, leak-proof containers in a way that prevents the glass capsule from breaking. (Manage mercury switches as hazardous waste. Containers should be labeled with “Hazardous Waste - Spent Mercury Switches”)  
- Use secondary containment for stored liquids such as oil, gas, and antifreeze, as well as for lead acid batteries.  
Good Housekeeping  
- Tank storage should be secured and locked.  
- Do not stockpile old tires as they are both a fire hazard and a breeding ground for mosquitoes and rodents. Use indoor tire racks.  
- Confine storage of parts, equipment, and vehicles to designated areas.  
- Vehicles of similar make and model should be located in a common area. Vehicles whose parts have higher demand should be in a common area and easily accessible.  
- Repair malfunctioning equipment that is responsible for any leak or spill as soon as possible.  
- Store batteries on impervious surfaces. Store batteries inside on a pallet or outside in a leak proof container. Curb, dike, or berm this area. |
| **Vehicle, equipment, and parts washing areas** |  
- Designate an area for cleaning activities.  
- Perform all parts cleaning operations indoors or cover and berm outside cleaning areas.  
- Clean parts using minimal amounts of solvents or detergents.  
- Recycle and reuse cleaning fluids where practical.  
- Use phosphate-free biodegradable detergents.  
- Use detergent-based or water-based cleaning systems in place of organic solvent degreasers.  
- Contain steam cleaning washwaters or discharge under an applicable NPDES permit.  
- Ensure that washwaters drain well.  
- Inspect cleaning area regularly.  
- Install curbing, berms, or dikes around cleaning areas.  
- Remove or deploy airbags prior to crushing or other maintenance activities.  
- Be certain all fluids have been drained from vehicle prior to crushing.  
- Fluid should be collected in a covered container, tested, and disposed of accordingly. |
### Table 2. BMPs for Potential Pollutant Sources at Automobile Salvage Yards (continued)

<table>
<thead>
<tr>
<th>Activity</th>
<th>BMPs</th>
</tr>
</thead>
</table>
| **Vehicle crushing activities** | - Capture crusher fluids to prevent spillage. Collect this mixture of fluids in a spill-proof covered container and dispose of it properly. It should not be allowed to drain onto the ground. Keep the drain within the crusher clean so that the fluids do not collect and overflow from the crusher onto the ground.  
- Installation of an engineering fabric, such as geotextiles, followed by gravel, or a bermed impermeable concrete surface would be ideal as a foundation under the crusher.  
- Develop a preventative maintenance program that involves timely inspections and/or maintenance of the crusher and facility equipment and vehicles.  
- Keep the crusher equipment clean. |
| **Automotive wastes**           | - Fuel - Drain fuel tanks, using air or hand pumps, into double-walled storage tanks. “Good” fuels can be reused on-site; “bad” fuels must be disposed of.  
- Antifreeze - Reclaim and re-use, if possible.  
- Freon (CFCs) - Voluntarily recapture, in anticipation of new regulations.  
- Used motor oil - Drain and store in double-walled tanks. Re-use on-site or send offsite for refining/fuel blending. Accepted practice to leave oil in the engine during storage. Oil filters should drain for 24-hours. Empty filters return to vehicle for scrap metal reclamation.  
- Other fluids and oils - Drain as completely as mechanically possible. Do not burn used oil unless approved.  
- Asbestos Brake Shoes and Clutches - If handled, should be wetted down to prevent asbestos particulates from becoming airborne.  
- Mercury switches - Remove promptly and avoid breakage. Store as hazardous waste.  
- Do not use vehicle fluids, oil, or fuels for dust or weed control. |
| **Liquid storage in above ground containers** | - Maintain good integrity of all storage containers.  
- Install safeguards (such as diking, berming, or permanent secondary containment) against accidental releases at the storage area.  
- Valves on permanent secondary containment should be kept in the “off” position and locked at all times, except when collected water is removed.  
- Inspect storage tanks to detect potential leaks and perform preventive maintenance.  
- Inspect piping systems (pipes, pumps, flanges, couplings, hoses, and valves) for failures or leaks.  
- Provide transfer of PFAS containing materials and their proper collection and disposal methods in the event of a release from their container. |
| **Illicit connection to storm sewer** | - Plug all floor drains if it is unknown whether the connection is to storm sewer or sanitary sewer systems. Alternatively, install a sump that is pumped regularly.  
- Perform dye testing to determine if interconnections exist between sanitary water system and storm sewer system.  
- Update facility schematics to accurately reflect all plumbing connections.  
- Install a safeguard against vehicle washwaters and parts cleaning waters entering the storm sewer unless permitted.  
- Maintain and inspect the integrity of all underground storage tanks; replace when necessary. |
What if activities and materials at my facility are not exposed to precipitation?

The industrial stormwater program requires permit coverage for a number of specified types of industrial activities. However, when a facility is able to prevent the exposure of ALL relevant activities and materials to precipitation, it may be eligible to claim no exposure and qualify for a waiver from permit coverage.

If you are regulated under the industrial permitting program, you must either obtain permit coverage or submit a no exposure certification form, if available. Check with your permitting authority for additional information as not every permitting authority program provides no exposure exemptions.

Where do I get more information?

For additional information on the industrial stormwater program see [www.epa.gov/npdes/stormwater/msgp](http://www.epa.gov/npdes/stormwater/msgp). A list of names and telephone numbers for each EPA Region or state NPDES permitting authority can be found at [www.epa.gov/npdes/stormwatercontacts](http://www.epa.gov/npdes/stormwatercontacts).

References

Information contained in this Fact Sheet was compiled from EPA’s past and present Multi-Sector General Permits and from the following sources:

http://es.epa.gov/techinfo/facts/epa/epa-fs.html

www.epa.gov/OST/stormwater

U.S. EPA. The National Vehicle Mercury Switch Recovery Program.
www.epa.gov/mercury/switch.htm

U.S. EPA, Office of Wastewater Management. NPDES Stormwater Multi-Sector General Permit for Industrial Activities (MSGP).
www.epa.gov/npdes/stormwater/msgp

www.anr.state vt.us/DEC/ead/sbcap/salvage/PDF/bmpguide.pdf