# INDUSTRIAL STORMWATER

### FACT SHEET SERIES

Sector U: Food and Kindred Products Facilities



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### *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 food and kindred products facilities as defined by Standard Industrial Classification (SIC) Major Code 20. This includes facilities manufacturing or processing foods, beverages, and related products for human consumption and prepared feeds for animals and fowls. Establishments engaged in manufacturing cigarettes, cigars, and other tobacco products are also included. Facilities and products in this group fall under the following categories, all of which require coverage under an industrial stormwater permit:

- Meat Products (SIC 2011, 2013, and 2015)
- Dairy Products (SIC 2021, 2022, 2023, 2024, and 2026)
- Canned, Frozen, and Preserved Fruits, Vegetables, and Food Specialties (SIC 2032, 2033, 2034, 2035, 2037, and 2038)
- Grain Mill Products (SIC 2041, 2043, 2044, 2045, 2046, 2047, and 2048)
- Bakery Products (SIC 2051, 2052, and 2053)
- Sugar and Confectionery Products (SIC 2061, 2062, 2063, 2064, 2066, 2067, and 2068)
- Fats and Oils (SIC 2074, 2075, 2076, 2077, and 2079)
- Beverages (SIC 2082, 2083, 2084, 2085, 2086, and 2087)
- Miscellaneous Food Preparations and Kindred Products (SIC 2091, 2092, 2095, 2096, 2097, 2098, and 2099)
- Tobacco Products (SIC 2111, 2121, 2131, and 2141)

#### 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 storm- water permit and links to State stormwater permits, go to www.epa.gov/npdes/stormwater and click on "Industrial Activity."

#### What pollutants are associated with my facilities activities?

Pollutants conveyed in stormwater discharges from facilities involved with the manufacturing of food and kindred products 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

Each of these factors interacts to influence the quantity and quality of stormwater runoff. For example, flour/oil particulate emissions from vents (e.g., from baking operations) may be a significant source of pollutants at some facilities, while material storage may be a primary source at others.

Similarly, a facility with all stormwater from exposed industrial activity diverted to the sanitary sewer would have less of an impact than a facility not practicing this control option. In addition, sources of pollutants other than stormwater, such as illicit connections, spills, and improperly dumped materials, may increase the pollutant loadings discharged in the receiving stream.

The nature of the business, and the required sanitary conditions, require that raw materials through final product be protected from stormwater. As such, the contamination of stormwater from these activities are primarily from the loading and unloading of products and raw materials; spillage and leaks from tanks and containers stored outdoors; waste management practices; pest control; and improper connections to the storm sewer.

The activities, pollutant sources, and pollutants detailed in Table 1 are commonly found at food and kindred products facilities.

Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Food and Kindred
Product Facilities

Activity	Pollutant Source	Pollutant	
Raw material unloading/	Container defects (bags, drums, bottles, crates)	Biochemical oxygen	
product loading	Spills and leaks during unloading/loading (tanks, rail cars)	demand (BOD), total suspended solids (TSS), oil	
	Failed connections (hoses and couplings)	and grease, pH, nitrogen	
	Washdown of unloading/loading area	(TKN)	
Liquid storage containers (i.e., above ground storage	Failed piping and connections (couplings, flanges, hoses, and valves)	BOD, TSS, oil and greases, pH	
tanks)	External corrosion and structural failure		
	Spills and overflows due to operator error		

Activity	Pollutant Source	Pollutant		
Liquid storage containers (drums, carboys, and gallon	Outside containers	BOD, TSS, oil and greases,		
	Open containers	ТрН - -		
jugs)	External corrosion of the containers			
	Operator handling and transporting			
	Spills and leaks from damaged containers			
Solid storage containers	Dust and particulates	BOD, TSS, pH		
(soils, holding bins, fiber drums, etc.)	Operator handling and transporting			
,	Spills and leaks	_		
Air emissions	Oven emissions	BOD, TSS, oil and greases, pH		
	Vents			
	Fine solids handling			
Solid waste	Dumpsters and trash cans			
Spent equipment, scraps, etc	BOD, TSS, oil and greases, pH, copper, manganese			
Wastewater	Treatment processes (e.g., hydraulic overflow)	BOD, TSS, oil and greases,		
	Outside piping and connections (couplings, flanges, hoses, valves, and pumps)	pH, fecal coliform		
Pest control	Outside application of pesticides, rodenticides, and insecticides	Miscellaneous insecticides, rodenticides, pesticides, etc., TKN		
Illicit connections to the storm sewer	Process wastewaters	BOD, TSS, oil and greases,		
	Process floor drains PH			
	Sanitary sewers			
	USTs			

 Table 1. Common Activities, Pollutant Sources, and Associated Pollutants at Food and Kindred

 Product Facilities (continued)

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 food and kindred products facilities. 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.

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.

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.

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#### Sector U: Food and Kindred Products Facilities

Implement BMPs, such as those listed below in Table 2 for the control of pollutants at food and kindred facilities, 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 food and kindred facilities; 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.

Pollutant Source	BMPs		
Raw material unloading/product		Situate loading/unloading areas indoors or in a covered area.	
loading		Confine loading/unloading activities to designated areas outside drainage pathways and away from surface waters.	
		Ensure that a facility representative is present during unloading/loading activities.	
		Close storm drains during loading/unloading activities in surrounding area.	
		Use a dead-end sump where materials could be directed.	
		Use rubber seals in truck loading dock areas to contain spills.	
		Inspect all containers for leaks or damage prior to unloading/loading of any raw or spent materials.	
		Avoid loading/unloading materials in the rain or provide cover or other protection for loading docks.	
		Provide diversion berms, dikes or grassed swales around the perimeter of the area to limit run-on.	
		Cover loading and unloading areas and perform these activities on an impervious pad to enable easy collection of spilled materials. Provide overhangs or door skirts to enclose trailer ends at truck loading/unloading docks.	
		For rail transfer, a drip pan shall be installed within the rails to collect spillage from the tank.	
		Where liquid or powdered materials are transferred in bulk to/from truck or rail cars, ensure hose connection points at storage containers are inside containment areas, or drip pans are used in areas where spillage may occur which are not in a containment area.	
		Drain hoses back into truck, railcar, etc. after loading/unloading materials.	
		Install high level alarm on tanks to prevent overfilling.	
		Use dry cleanup methods rather than washing the areas down.	
		Regularly sweep area to minimize debris on the ground.	
		Provide dust control if necessary. When controlling dust, sweep and/or apply water or materials that will not impact surface or ground water.	
		Train employees in spill prevention, control, cleanup, and proper materials management techniques.	
		Train employees on proper unloading/loading techniques.	
		Initiate an inventory control for all raw and spent materials.	

Table 2. BMPs for Potential Pollutant Sources at Food and Kindred Pro	Product Facilities
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Pollutant Source	BMPs		
Liquid storage		Cover and/or enclose storage areas to minimize exposure of tanks and the collection of stormwater inside the curbed/diked area.	
		If area is uncovered, connect sump outlet to sanitary sewer (if possible) or an oil/ water separator, catch basin filter, etc. If connecting to a sanitary sewer check with the system operator to ensure that the discharge is acceptable.	
		Surround above-ground liquid storage tanks with curbs/dikes to provide secondary containment storage. The enclosed volume should be the greater of either 10% of the total tank volume or 110% of the volume contained in the largest tank.	
		If containment structures have drains, ensure that the drains have valves, and that valves are maintained in the closed position.	
		Institute protocols for checking/testing stormwater in containment areas prior to discharge.	
		Install impervious surface for the floor of the storage area and slope it to a lined sump for the collection of spills.	
		Use drip pans when loading and unloading liquid materials and place at locations where spillage may occur (hose connections, hose reels, filler nozzles, and opened tanks/drums).	
		Bulkhead liquid storage tanks indoors (i.e., tank outlets located inside buildings).	
		Inspect the external condition (corrosion, leaks) of the containers.	
		Inspect the general area around the containers.	
		Use double-walled tanks.	
		Develop and implement spill plans.	
		Train employees in spill prevention, control, proper storage, handling and transportation techniques (e.g., filling and transferring contents).	
Liquid storage (drums, carboys,		Store containers indoors when possible.	
and gallon jugs)		Store containers, including empty or used containers, in secondary containment with a roof or cover (including temporary cover such as a tarp that prevents contact with precipitation).	
		Store containers, including empty or used containers, in secondary containment with a roof or cover (including temporary cover such as a tarp that prevents contact with precipitation).	
		Provide secondary containment, such as dikes or portable containers, with a height sufficient to contain a spill (the greater of 10 percent of the total enclosed tank volume or 110 percent of the volume contained in the largest tank).	
		Clearly label containers with its contents.	
		Ensure that all containers are closed (e.g., valves shut, lids and manways sealed, caps closed).	
		Wash containers indoors before storing empty containers outdoors.	
		If outside or in a covered area, minimize run-on of stormwater into a storage area by grading area to ensure that stormwater runs "off" and not "on."	
		Maintain an inventory control of all raw and spent materials.	
		Employ measures to protect against spillage from the overflows (e.g., high level sensors, alarms).	
		Train employees in spill prevention and control.	
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Table 2. BMPs for Potential Pollutant Sources at Food and Kindred Product Facilities (continued)

Pollutant Source	BMPs	
Waste management - wastewater		Develop a leak prevention program for valves, pumps, and piping equipment.
		Inspect the outside pipe connections (couplings, valve seals and gaskets, flanges, etc.) of the treatment system for leaks, corrosion, and poor maintenance upkeep.
		Use dry cleanup methods.
Waste management - solid waste (paper, wood pellets, scrap		Inspect the general area around the solid waste storage (e.g., look for signs of leaching).
metals, refuse, etc.)		Store waste so that it is physically contained (dumpsters, drums, bags). Store waste in an enclosed/covered area.
		If outside or in a covered area, minimize exposure to stormwater by grading the area to ensure that stormwater runs "off" and not "on."
		Ensure hazardous waste disposal practices are performed in accordance with federal, state, and local requirements.
		Route trash compactor leakage to treatment system or sanitary sewer.
Waste management - air		Clean around vents and stacks to atmosphere from process and storage areas.
emissions		Place tubs around vents and stacks for easy collection of settling particles.
		Remove fugitive dust accumulations on ledges, walls, floors, and equipment. If you use compressed air to clean up dust, shut down your machinery and other potential ignition sources.
		Inspect air emission control systems (e.g., baghouses) regularly and repair and replace as necessary.
		Route overflows/condensates from process vents to on-site treatment system or to the sanitary sewer.
		Minimize free-fall height to reduce fugitive-dust losses.
		Locate fabric dust-filter collectors outside the facility if possible. If fabric dust-filter collectors are inside the facility, place them in an area protected by an explosion-protection system.
Pest control		Follow manufacturer's directions for application of pest control materials to site.
		Time application for dry weather conditions.
		Store partially full containers indoors or undercover.
		Apply insecticides during breeding months.
		Protect rat bait houses from stormwater.
Improper connections to the storm sewer		Perform smoke or dye testing to determine if interconnections exist between the sanitary and storm sewers.
		Plug all floor drains leading to storm sewers.
		Update facility schematics to accurately reflect all plumbing connections.
Meat products - operation		Enclose/cover fowl hanging area.
of meat packaging plants including animal holding pens		Enclose/cover the animal holding pens.
(beef, chicken)		Grade the areas around the animal holding pens to ensure stormwater "runs off" and not "on" to the holding pen. And regularly inspect area around animal holding pens for stormwater runoff or run-on.
		Store materials from cleanup activities in appropriate containers in an enclosed/ covered area.
		Area for trailers holding empty bird cages should have stormwater run- on/runoff controls in place.

#### Table 2. BMPs for Potential Pollutant Sources at Food and Kindred Product Facilities (continued)

Pollutant Source	BMPs		
Meat products - operation of meat packaging plants		Use mechanical sweepers around site to clean up fugitive feathers, dust, and manure.	
including animal holding pens (beef, chicken) (continued)		Decrease total lot area when animal numbers are low to decrease total stormwater runoff.	
(continued)		Direct run-off to storage lagoons and holding ponds until it can be land applied or evaporated or discharged to a municipal treatment system. If connecting to a sanitary sewer check with the system operator to ensure that the discharge is acceptable.	
	Tra	in employees on proper material (i.e., hide, hair, feathers, and animal parts) cleanup procedures around and within the animal holding pens.	
Manure management		Place animal manure in grassy area as far as possible from water courses so seepage has a chance to be filtered and absorbed by the grass before entering creek or stream. For land with a slope of greater than one percent, plant a dense, sod forming grass at least 20 feet wide around the downgradient side of any manure stockpile.	
		Use grass filter strips, filter fencing, or straw bales to filter solids and nutrients from runoff.	
		Store manure in bermed or covered areas.	
Dairy products - manufacturing and storage of packaged dairy		Store aged/spoiled dairy products in enclosed storage area on an impervious or contained pad and under a roof or canopy where possible.	
products (including spoiled and broken product containers)		Use dry cleanup methods instead of washing the areas down.	
		Ensure that all aged/spoiled products (e.g., bottles, cartons, plastic containers) are disposed of in a proper manner (bagged, covered).	
		Keep foam from going into sewers because it contains milk solids. Common sources of excessive foaming are open-type separators, splashing when filling tanks, air sucked in through leaky connections in lines under partial vacuum, through leaky packing and through faulty rotary seals or pumps.	
		Inspect storage area for leaks and spills and to monitor housekeeping and runoff prevention practices.	
		Train employees on spill prevention, control and proper disposal methods for all aged/spoiled dairy products.	
Canned frozen and preserved fruits, vegetables, and frozen		Store all fruits and vegetables in appropriate containers (e.g., bins, bushels, baskets, buckets) and in enclosed/covered areas.	
specialties - fruit and vegetable storage and disposal		Minimize fruit and vegetable storage time outdoors.	
		Store empty fruit and vegetable containers in an enclosed/covered area.	
		Use particulates emission control systems for all cooking processes to reduce particulate matter.	
		Inspect all fruit and vegetable storage areas to monitor BMP implementation.	
		Train employees on proper handling/disposal methods for fresh/rotten fruits and vegetables.	
Grain mills - grain handling, storage, and mixing		Store all grain in appropriate containers (e.g., silos, hoppers) in an enclosed/ covered area.	
		Use a vacuum control system in all grain mixing areas to minimize fugitive dust.	
		Inspect the general area around the grain storage to monitor BMP implementation.	
		Train employees on grain handling procedures.	

Pollutant Source	BMPs	
Bakery products - ingredient storage and mixing	Store all ingredients (e.g., corn sweeteners, flour, shortening, syrup, vegetable oils) in appropriate containers (e.g., tanks, drums, bags) in an enclosed/covered area.	
	□ Inspect ingredient storage areas for BMP implementation.	
Bakery products - baking	Remove flour/oil dust accumulation around ventilation exhaust systems.	
process	Install an air emission control system for all baking processes to reduce particulate matter.	
Sugar and confectionery - sugar handling	□ Use a vacuum control system in all granular and powdered processing areas.	
Fats and oils - storage and disposal	Store all fats and oils, (e.g., butcher shop materials, hair, hide, tallow, bone meal, and offal) in enclosed/covered areas.	
	Ensure all fats and oils are physically contained.	
	Inspect all fats and oils storage areas for BMP implementation.	
Beverages - materials storage	Ensure grain is stored in enclosed/covered area.	
and mixing	Use a particulates emission control system for all grain handling and brewing processes.	
	Protect reusable beverage containers that are stored outdoors from stormwater contact.	

Table 2. BMPs for Potential Pollutant Sources at Food and Kindred Product Facilities (continued)

### 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.

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.

#### References

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

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