# AQUALIS AVOIDING THE HIGH COST OF STORMWATER VIOLATIONS

Across the country, businesses large and small are paying a high price for neglecting stormwater systems on their property. In 2022, the Office of Enforcement and Compliance Assurance (OECA) issued over \$300 million in penalties, fines and restitution for various violations, according to U.S Environmental Protection Act (EPA) records.. Penalties from state and local agencies can be extreme with state fines up to \$25,000 per violation per day.

This white paper explores the purpose and types of stormwater regulations and how they are enforced. Details on regulatory requirements and who is responsible for stormwater compliance will be provided. Most importantly, readers will learn how to protect their business from the financial and reputational impact of stormwater violations by remaining compliant, while positively impacting and protecting the environment.

Business and property owners and managers must be proactive about protecting our water resources. Failure to properly manage stormwater issues comes at a high monetary and critical environmental cost. Partnering with experts in the industry and taking positive action greatly reduces the risk of costly fines from stormwater violations. This white paper showcases real-life studies of businesses that failed to act, often resulting in huge costs from fines and penalties.



# CASE STUDY

## PORT ANGELES INDUSTRIAL WATERFRONT- WASH.

#### **OVERVIEW & PROBLEM**

Port Angeles Industrial Waterfront was found in violation of the Clean Water Act in Spring of 2022. In addition to the violations, site errors included numerous exceedances of permit limits. Pollutants identified included: Total Suspended Solids, Turbidity, Total Zinc, Copper and other metals

#### VIOLATIONS:

- Failure to update SWPPP
- Failure to properly store hazardous material
- Failure to sample all outfalls
- Continual use of expired pH buffer solutions



**Corrective Action Required:** Ensure the property is properly sampling and monitoring stormwater discharges and address potential pollutants promptly

**Penalties:** : Total Federal Penalty Assessed or Agreed to: \$67,000

Total Compliance Action Cost: \$5,000





## STORMWATER ENFORCEMENT

There are a variety of factors that drive federal, state or local regulators to enforce stormwater regulations. Many of these factors depend on the permitting agency and include a variety of triggers or notifications that could initiate the agency to issue a violation or inquiry into a property, due to the lack of compliance of water management assets.

A large spill or pollution event, readily visible and in the news would provide a definite catalyst for an agency to take a closer look. A complaint about odors, vectors or a flooded parking lot, due to inadequate draining of of stormwater assets would also alert local agencies to an issue.Most often, enforcement begins after a regulatory inspection of a company's stormwater facilities.

While inspections can occur in response to citizen complaints, regulators will conduct inspections both on a scheduled, noticed basis or at unannounced times.

Proper preparation and coordination with municipal regulators ensure open communication and proper scope to bring a site to compliance or to keep compliant paperwork on file with the city.

## NOTICE OF VIOLATION

When deficiencies or violations are found, a written Notices of Violation (NOV) is typically sent to the violator, which in many cases is the property owner or property management group. This is an official notification of noncompliance with stormwater regulations and should be taken seriously.

The NOV includes a list of which stormwater regulations were violated, with dates and times noted. The NOV may describe actions to correct the deficiencies and may include a requirement for written response or to schedule a meeting with the regulator. An NOV is very detailed and typically will include the daily financial penalties if not addressed in the proper time frame. In many cases an extension can be put on violation, especially when working directly with a stormwater management provider to provide liaison communications with the municipality.

# SETTLEMENTS

A legal agreement is often formed after an NOV is issued. This may be a Consent Agreement or Administrative Order that stipulates corrective actions and penalties. Depending on the severity of violations, a business may need legal counsel and engineering assistance.





### PENALTIES AND ASSOCIATED COSTS

Stormwater penalties and violations come with a hefty price tag. Violations of the Clean Water Act (CWA) can reach up to \$25,000 per violation, per day. The financial burden could be devastating for big and small businesses. In addition to monetary fines, costs for violations include repair or improvement of existing facilities, enhancement of stormwater management plans and legal costs. Costly Supplemental Environmental Projects (SEPs) may be required as well. The resulting bad media representation may also affect customer perception of a business. Examples of high-cost penalties include:

EXXON MOBIL discharged tens of thousands of partially treated oil and wastewater in Illinois and was fined **\$59,473**.

Pilot Flying J was found in violation of the Clean Water Act **301 times** across 20 stations in Iowa, Missouri and Nebraska. Federal Penalty totaled **\$121,469** in addition to restoring each property.

Sundance Lumber Company in Springfield Oregon failed to properly document BMP's on the property SWPP. The property was fined **\$64,500** in January of 2022 and has since returned to compliance.

Many organizations enact environmental stewardship programs after these large violations to mitigate further risk of a stormwater violation to occur on such a large scale. With preventative maintenance and compliance measures, these violations and fines can be avoided.

### PURPOSE OF STORMWATER REGULATIONS AND COMPLIANCE

The ultimate goal of stormwater regulations is to protect the natural environment. When it rains, pollutants exposed to weather can flow into local waterbodies. Pollutants may include debris, sediment, oils, fertilizers and toxic chemicals such as pesticides and herbicides. These contaminants can degrade biological habitats, cause fish kills, create flooding conditions and threaten drinking water supplies.

Stormwater regulations may also prevent other environmental problems such as odors or vector attraction. For instance, a poorly maintained stormwater system may contain septic water or excess vegetation, creating problems with insects or vermin.

Lack of maintenance in ponds and retention facilities can reduce flow. This results in stagnant water which then becomes a breeding ground for mosquitoes.

# THE EFFECTS OF URBANIZATION

The EPA describes urbanization as the "concentration of human populations into discrete areas." The problem of stormwater runoff is exemplified by ever-increasing urbanization. With urbanization comes more buildings and impervious surfaces including roofs, roads and parking lots. With no retention or natural treatment areas, stormwater carries pollutants quickly and directly to area waterbodies.

The 2020 U.S. Census found that about 80 percent of metropolitan areas grew between 2010 and 2020. Additionally a U.S. Geological Survey study on urbanization and watersheds noted that urban acreage is expected to increase across the country, which will continue to exacerbate the situation. Stormwater regulations and violations will continue to remain a priority as local municipalities put more emphasis on addressing increased pollutants and strict guidelines from the EPA to address increased urbanization.





### STORMWATER CONTROL MEASURES

Regulations often require Stormwater Control Measures (SCMs), also known as BMPs or Best Management Practices.

SCM systems are designed to control the quality and quantity of stormwater. They accomplish this by alleviating flooding conditions for impervious surfaces that do not allow for infiltration. These systems are regulated for design, capacity and outflows to protect local communities from contaminants and flooding conditions. Types of SCMs or BMPs can range from detention basins, retention ponds and catch basins to inlets, outlets, sand filters, bioswales, permeable pavement and many other types of drainage or proprietary systems designed to control stormwater.



## STORMWATER REGULATIONS OVERVIEW

Business owners and managers, engaged in the numerous responsibilities of running a company, may be unaware of stormwater regulations that affect them. Some may not be aware of stormwater facilities on their property. Yet, compliance with these regulations can save future costs in time and money. Federal, state, or local stormwater laws affect most businesses.

Compliance violations vary and may include a discharge of contaminants into the stormwater system, lack of system maintenance, poor housekeeping, not having a required permit, lack of employee training, poor recordkeeping, failure to use Best Management Practices and more.



# FEDERAL STORMWATER REGULATIONS

The U.S. Environmental Protection Agency (EPA) is the federal agency responsible for stormwater regulations under the Clean Water Act. These rules are issued as part of the National Pollutant Discharge Elimination System (NPDES) that regulates stormwater discharges from three sources.

Industrial activities include 11 categories such as manufacturing, metal scrapyards, transportation facilities, treatment works, mining and other industries.Construction activities that disturb one or more acres, or smaller sites that are part of a larger common plan of development are covered under these NPDES regulations.

Municipal systems include storm systems owned by state or local governments that discharge to waters of the United States.

## STATE STORMWATER REGULATIONS

The EPA delegated authority to most states to implement NPDES regulations. States also enact their own regulations which must be at least as stringent as the EPA rules. States may enforce additional or more stringent rules to address specific locational issues.



### LOCAL STORMWATER REGULATIONS

Stormwater runoff commonly flows through conveyance systems owned by cities, towns, counties and other local governments. Local governments are permitted by their state (or the federal government for the few states without delegated authority) as Municipal Separate Storm Sewer Systems (MS4s). There are approximately 7,550 MS4s throughout the country.

MS4 permits require permittees to develop and implement a comprehensive Storm Water Management Program (SWMP) that includes pollution prevention measures, treatment or removal techniques, monitoring, use of legal authority, and other measures to control the quality of stormwater discharged to receiving waterbodies.

To meet requirements, local governments must regulate businesses and industries. Many cities have their own environmental regulatory agencies to enforce stormwater rules, though some use the local code enforcement departments.



# CASE STUDY SAINT-GOBAIN COMPANIES

#### **OVERVIEW**

Saint-Gobain Abrasives Inc. and Saint-Gobain Ceramics & Plastics, Inc., a worldwide manufacturer of abrasives with 65 manufacturing facilities including one in the state of Massachusetts, was subject to EPA regulations due to improperly maintained stormwater pipes. Contaminated groundwater entered old stormwater pipes and flowed into the drainage system at one unpermitted facility. EPA inspections also found benchmark levels of contaminants were exceeded in stormwater, among other issues.

#### **PREVENTATIVE MAINTENANCE**

The consequences of improperly managing stormwater assets include the financial burden of fines as well as the costs to bring the system back to compliance. While the fines and regulations are designed to keep property owners accountable, assets still have to be brought up to compliance standards regardless of if fines are issued by the federal government or local municipality. Working directly with a stormwater professional reduces these risks, ensures proper compliance and repair and mitigates future regulation violations.

#### **VIOLATIONS:**

Failure to comply with permit requirements

Discharging stormwater and groundwater without a permit

Failure to comply with Spill Prevention, Control and Countermeasure (SPCC) regulations

#### SOLUTIONS

**Corrective Action Required:** Reline a subsurface storm pipe to prevent infiltration of contaminated groundwater. Comply with SPCC and permit requirements.

**Penalties:** \$131,000 fine plus a Supplemental Environmental Project (SEP) valued at \$100,000 to install up to five storm water protection devices in the watershed surrounding Indian Lake.

### PERMITTING RESPONSIBILITY FOR STORMWATER COMPLIANCE

#### Industrial permits

Due to the potential for harmful runoff, industrial activities are held to a higher standard of stormwater regulations. For industrial permits, the operator of any of the 11 categories of industrial activity is responsible to meet the permit requirements. The 11 categories are:

**Category One:** Facilities subject to federal stormwater effluent discharge standards at 40 Code of Federal Regulations (CFR) Parts 405-471 (Includes certain food processing and manufacturing)

**Category Two:** Heavy manufacturing (e.g., paper mills, chemical plants, petroleum refineries, steel mills and foundries)

**Category Three:** Coal and mineral mining and oil and gas exploration and processing

**Category Four:** Hazardous waste treatment, storage and disposal facilities

**Category Five:** Landfills, land application sites, and open dumps with industrial wastes

**Category Six:** Metal scrapyards, salvage yards, automobile junkyards and battery reclaimers

**Category Seven:** Steam electric power generating plants

**Category Eight:** Transportation facilities that have vehicle maintenance, equipment cleaning or airport deicing operations

**Category Nine:** Treatment works treating domestic sewage with a design flow of 1 million gallons a day or more

**Category Ten:** Construction sites that disturb 5 acres or more (permitted separately)

**Category Eleven:** Light manufacturing (e.g., food processing, printing, publishing, electronic and other electrical equipment manufacturing, public warehousing, and storage)



**Construction permits** are issued to the operators of construction activities that disturb one or more acres of land, or smaller activities that are part of a larger common development.

Construction activities remove vegetation and disturb the land. Rainfall flowing over the construction sites can wash sediment and other pollutants into nearby water bodies. Construction permits help to ensure the proper SCMs and BMPs are designed and in place to protect receiving waters.

**Municipal permits (MS4)** are issued to public entities (cities, counties, villages) that own a stormwater system that discharges to waters of the United States.

Stormwater typically flows into infrastructure owned by a local government or agency. The storm system is called a municipal separate storm sewer system (MS4). These local governments must obtain a permit from the state or federal government, which requires development and implementation of a Storm Water Management Program (SWMP). The SWMP is designed to minimize the discharge of pollutants into the local stormwater system.



# CASE STUDY

# LACKAWANNA COLLEGE

#### **OVERVIEW**

A local college in Scranton, Pa. was held accountable for dredging and filling wetlands on the property. The college created a paved parking lot and temporary classrooms covering just under an acre. As the wetland is connected to federal waters, this project required permitting that was not acquired.

#### **COMPLYING ACTIONS:**

Remove all fill material including buildings and pavement, restoring proper depth and grade to the wetland

Apply thin layer of topsoil mixed with native seeds and straw mulch across the site.

All unauthorized fill material must be disposed at an upland area in accordance with waste management regulations



#### **AS BUILT REPORT:**

Within 30 days of completion, Lackawanna College had to provide the EPA with total volume of fill material removed, names and locations of all disposal sites, type and rate (pounds/square foot) of seed mix, and process photographs.

Penalties: \$67,640.

#### SOLUTION

In order to regain compliance, Lackawanna college was required to completely remove all unauthorized fill material and restore the wetlands to previous function. The EPA approved a wetland seed mix for replanting and monitored the disposal of fill material.

### ELEMENTS OF COMPLIANCE

Compliance with stormwater regulations is imperative to avoid the cost of fines, SEPs, and associated engineering and/or legal fees.

# STORMWATER PERMITS

State and federal regulators typically use NPDES Stormwater Permits to manage compliance. Each entity, whether a company or a local government, is issued a permit that specifies required activities and limitations. Operating without a permit is a violation and ignorance of the law is no excuse as we've seen throughout the White Paper with real-life case studies. Commercial businesses that do not meet the criteria



for NPDES Permits may still need a stormwater permit from the local government. Even if a business is not required to have a permit, local government agencies can inspect any stormwater system discharging to storm drains or waterbodies and enforce local regulations. Stormwater professionals can assist in determining if post-construction properties require a permit and what permit should be filed and held within the local municipality.



To maintain compliance, businesses must first ensure they have a permit if one is required. Then, they must fulfill the permit requirements. Permits can be complex, but typically include some of these key requirements:

### STORMWATER POLLUTION PREVENTION

**Best Management Practices (BMPs)** – BMPs can be structural or non-structural methods to control or minimize surface water degradation. Structural methods are engineered facilities that include retention or detention ponds, swales, underground storage tanks, filtration systems and other physical means to control runoff. Non-structural BMPs include cultural controls like policies, ordinances and conservation plans.

**Spill Prevention, Control and Countermeasure Plan** (**SPCC**) – An SPCC may be needed if certain amounts of oils, greases or chemicals are stored or used on the site. The SPCC outlines how to prevent spills and keep

spilled contaminants from entering the storm system.

**System maintenance** – This may include preventive and corrective maintenance on any mechanical systems as well as pipelines, grounds maintenance, storm drain cleaning and erosion control.

**Inspections** – Scheduled inspections of stormwater facilities must be conducted to ensure the system is being properly maintained and BMPs are followed. Inspection requirements are dependent on the municipality, some requiring yearly scheduled inspections or others requiring less frequent inspections. However, all inspection reports are to be filed and on record with the municipality. Additionally, inspections may need to be performed by a licensed engineer and require specific documentation.

**System Monitoring** – Some permits require sampling and testing of stormwater flows to determine pollutant levels.

**Staff training and certification** – All staff responsible for maintaining the stormwater system must be trained at least annually. Some permits require certification or licensing for technicians, operators or inspectors. **Recordkeeping and reporting** – In addition to a current SWPPP and SPCC, records of BMPs, maintenance, inspections and training must be kept on file. Any spills, breakdowns or abnormal events must be recorded and reported to the regulatory agency. Written reports must be submitted to the regulator as detailed in the permit including annual inspections.

Maintaining compliance with stormwater permits and practices can be time consuming and technically difficult. Partnering with an expert in stormwater compliance can streamline the process while preventing costly violations.





# PREVENTATIVE MAINTENANCE

Awareness for stormwater compliance continues to remain a priority for municipalities and cities across the country. In the case of the Oakland Concrete and Recycling initiative these violations were discovered by a new task with partnerships with multiple agencies. San Francisco Bay Regional Water Quality Control Board along with the EPA enacted their inspections to focus on industrial businesses. No business is immune to these compliance standards and regulations may not be enforced at a local jurisdiction at this moment, but it is only a matter of time before non-compliant businesses must pay the price.

#### HOW TO PROTECT YOUR BUSINESS AND THE ENVIRONMENT

Stormwater penalties can devastate the financial status and reputation of a business. There are many ways property owners and managers can protect their property and local watersheds. Partnering with stormwater experts is a critical prerequisite in ensuring compliance in a swift, comprehensive manner. Below, you will find key steps to help avoid violations:

#### KNOW YOUR FACILITY

- Ensure site plans and drawings are available and review them thoroughly for accuracy.
- For newly developed properties, property owners may be able to find these plans on file with their local municipality.
- Physically inspect every part of the drainage system to understand how it works.
- Determine the system's current condition and any maintenance or improvements needed.
- Understand if an Operations & Management (O&M) agreement is on file that outlines all responsibilities for maintenance of the stormwater assets.





#### **OBTAIN AND REVIEW STORMWATER PERMITS**

The facility may have an existing permit, but if not, determine if one is needed. If your business falls into any of the 11 categories of industrial activity a permit is required. Otherwise, review local ordinances to determine any permitting needs. Operating a stormwater system without a permit is a violation that may garner heavy fines.

Be sure to review stormwater permits carefully. Craft a plan and create a schedule to comply with permit conditions.

#### **UNDERSTAND YOUR REGIONAL RISKS**

Stormwater management looks slightly different in each region of the country. Having a better understanding of the seasonal weather patterns and the types of assets in the region will produce a more comprehensive maintenance approach. For example, the following regions are just a snippet of the difference in approach to maintenance across the country:



#### **Pacific Northwest**

This region includes highly regulated stormwater standards due to the elevated rainy-season precipitation rates and the mix of winter storms. These storms increase debris, trash, and sediment that needs to be cleared from underground stormwater systems frequently. The aide of industrial vacuum and jetting trucks assists in catch basins and underground vaults to remove the build-up of unwanted and non-compliant sediment. A strategic stormwater partner understands these risks and produces the appropriate tools to ensure these properties in this territory remain compliant and mitigate flooding risks.

#### Northeast

The northeastern U.S. experiences stormwater challenges related to deicing salt and sand during the winter months. Freezing and thawing can damage stormwater infrastructure and large spring melts can contain stored pollutants that are more than BMPs can handle. Creating the right plan for this region for rehabilitation and repair in the fall ensures systems are ready to take on the heavy load of the snowmelt pollutants and increased rain when Spring arrives. In addition, major winter storms and tropical storms along the coast can overwhelm stormwater facilities. An experienced technical partner can provide protocols and assistance to address these issues.

#### Midwest

The arid nature of this region may make stormwater issues seem moot. However, snow melt from mountainous areas, flash floods, and forest fires contribute to the risk of stormwater violations. Stormwater management is just as much a priority in this region, especially since stormwater capture is a major part of ensuring sufficient drinking water.

#### Southeast

While quite a juxtaposition to the Northeast, dormant vegetation is not typical in most southern states, including Florida. Vegetation management with high growth in the spring and summer months must be treated frequently, removing nuisance vegetation and common mowing to keep stormwater ponds in compliance. Detention ponds are commonly found in this region and with higher precipitation in the region, larger stormwater detention ponds assist in managing stormwater runoff. Ensuring the right stormwater management plan increases the property's safety and mitigates the risk of non-compliance fines.

# **OPERATIONS AND MANAGEMENT AGREEMENT**

An Operations & Management (O&M) agreement is issued to the property owner after construction with detailed maintenance and inspection protocol listed. Trained experts can provide the services to ensure a facility meets regulatory requirements outlined in an O&M agreement. The items below are typically included and outlined within the O&M agreement:

#### **Annual Inspections**

While the system should be monitored on an ongoing basis, formal annual inspections should be conducted to ensure the system has been properly maintained and functions as designed. These inspections should be recorded in writing, with photos as appropriate and recommendations for improvement.

# Spill Prevention, Control and Countermeasure Plan (SPCC)

An SPCC Plan may be needed if certain amounts of oils, greases or chemicals are stored on site to prevent spills from reaching waterbodies. The SPCC should be updated on at least an annual basis or when facilities are modified.

#### Proper Installation and Use of SCMs

BMPs are detailed in the O&M Agreement to ensure they are in use and properly installed. Specific maintenance requirements are detailed in the O&M agreement in regard to each BMP. BMPs represent the best defense for protecting downstream waterbodies from stormwater pollution.

#### Staff Awareness and On-Site Management

Onsite employees must understand the stormwater system and how it works. Team members must be trained on the O&M Agreement, including BMPs and how to properly maintain them and who to contact in the event of an emergency such as parking lot flooding, improper drainage or if an NOV has been issued. Property owners should ensure employees who assist with stormwater system maintenance obtain any necessary certifications and keep them current or hire a stormwater professional partner to alleviate the need for hiring them in-house.

Businesses with high turnover should confirm employees review and understand the O&M agreement upon hiring. Documentation of all training should be kept on file to ensure all compliance standards are upheld

#### **Facility Maintenance**

Properly inspecting and maintaining facilities is essential for stormwater compliance. This includes maintenance of facilities that are not part of, but could affect, the stormwater system.

Vegetation management is an important part of stormwater system maintenance, and one that is often found noncompliant. Collection and removal of sediment are necessary steps for proper stormwater system performance as well. Regularly scheduled capacity testing to estimate the hydraulic conductivity of the system should also be included in the O&M Agreement.

A common issue is electrical or mechanical failure of a private sewer lift station. While not technically part of the stormwater system, a wastewater overflow that drains into the storm system is considered a major potential impact and often results in costly penalties.

In cases where maintenance has been neglected or records are missing, a trained stormwater professional can examine every facet of the system. Based on the results, they can prepare an action plan for any remedial repairs and ensure the system is compliant.

#### Monitoring

Some stormwater permits require scheduled sampling and laboratory testing of stormwater effluent. If monitoring is required in the permit, sampling and testing must be scheduled ahead of the due date to submit timely reports to the regulators.

#### Accurate Recordkeeping and Reporting

Records must be kept of all activities related to the stormwater system. Activities include BMP installation, inspections, capacity testing, maintenance tasks, repairs, modifications and monitoring results. The permit will specify how long records must be kept.

If the permit requires submittal of reports, they must be complete, accurate and submitted by the due date. Accurate records detailing proactive measures may prevent or reduce penalties by showing a good faith effort at properly operating the stormwater system.







#### LEGAL SETTLEMENT:

The West Penn Power Company owns and operated two landfills in western Pennsylvania. Both properties operate as coal ash impoundments landfills as coal is burned to produce power. By products from burning coal can be harmful to the environment. The EPA is taking steps to protect groundwater from this contamination and hold facilities accountable.

EPA concerns include improper groundwater monitoring, insufficient cleanup information, and regulation of inactive surface impoundments.

The Consent Decree between West Penn Power and co-plaintiffs; EPA and PADEP eliminates any confusion of liability and accountability.

### CASE STUDY

### WEST PENN POWER COMPANY

#### **OVERVIEW**

West Penn Power Company acted as defendant against co-plaintiffs EPA and PADEP while agreeing upon a consent decree, or written agreement. The Power Company had previously been issued violations and now came to a legal agreement with the governing bodies regarding remediation of their properties.

#### PROBLEM

Previously, West Penn Power Company failed to comply with permit effluent limitations for boron at two impoundments landfills in western PA. The company was found in violation of the Clean Water Act and Pennsylvania's Clean Streams Law.

#### SOLUTION

Upon the settlement, West Penn Power must construct gravity pipeline to a new outfall location and monitor any discharges. The company must pay \$610,000 in civil penalties, half to the state of Pennsylvania and half to the United States.

**Corrective Action Required:** Construct new pipeline and associated outfall location leading to an additional water source for each landfill

#### Penalties:

\$350,000 to the state of Pennsylvania \$350,000 to the United States

#### **PREVENTATIVE MAINTENANCE**

Preventative measures including routine maintenance, inspection and on-call emergency services would have alerted lift station professionals of the potential failure, not only saving in costly violations but also saving Family Dollar in lift station repairs.



# ENGAGE THE HELP OF EXPERTS

Stormwater compliance can be complicated, highly technical and time consuming. Dealing with stormwater issues may seem overwhelming for those juggling the multiple tasks and priorities of running a business.

A comprehensive water resource management team can help businesses protect the environment while protecting their assets. Stormwater professionals streamline the process using their expertise and knowledge of stormwater regulations.

They can provide highly experienced and certified inspectors and technicians to implement a stormwater program. Help is available to make sure every aspect of the stormwater system meets regulatory requirements, including:

- Inspection of all structures
- Removal of trash and debris
- Sediment control
- Structural maintenance (stabilizing poor coverage and erosion)
- Vegetation management (mowing grass, removing nuisance or invasive growth, managing beneficial species)Vacuuming (Vactor) and high-pressure jetting
- Filter cartridge replacement
- Documentation for any structural deficiencies or sinkholes
- Address repairs, rehabilitations or retrofits as needed

### WATER COMPLIANCE IS NOT OPTIONAL.

# AQUALIS. aqualisco.com 855.890.6390



Stormwater compliance is too important to ignore or take half measures. To meet regulations, you must have a deep understanding of your stormwater facilities, regional risks, and permit requirements. You must also properly implement SCMs/BMPs, perform inspections, maintenance, monitoring, recordkeeping, reporting, and training.

An O&M Agreement with a stormwater expert ensures these tasks will be completed properly while allowing you to concentrate on running the business or managing the property. With the help of a technical partner, you can avoid the high costs and bad public relations of stormwater violations.

Request a free consultation from AQUALIS to protect your property today.

Call **855.236.1160** to speak to a represenative or submit a request at AQUALISCO.COM