



**Boston Water and
Sewer Commission**

Development and Implementation of an Industrial Facility Stormwater Pollution Prevention Program in New England

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Introductions

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Presentation Outline

- 1) Program Background
- 2) Inventory List Development of Industrial Facilities
- 3) Is Industry Eligible for Coverage Under Multi-Sector General Permit?
- 4) Inspection Program
- 5) Facility Inspections
- 6) Inspection Results
- 7) Data Collection & Information Management Portal Overview
- 8) Transitioning Program to BWSC

1 Program Background

1972 Clean Water Act

Multi-Sector General Permit
(MSGP)

Industrial Facility Stormwater
Pollution Prevention Program
(IFSPPP)

Consent Decree Requirements

- Develop Ongoing IFSPPP
- Submit IFSPPP for Approval within 180 days from CD
- Develop and Maintain Database

Milestone Dates

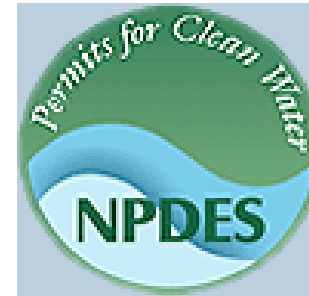
- Consent Decree Issued - July 2012
- Inventory List - January 27, 2013
- Initial Training – 30 days after list
- Inspections 90% Completed by end of Year 2

EPA's 1972 Strategy

NPDES Program

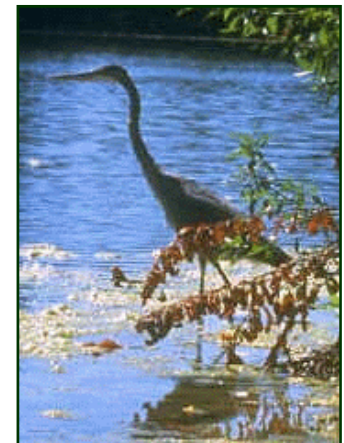
A. Point Source Pollution

1. Wastewater



B. Non-Point Source Pollution

1. Stormwater – Municipal (MS4)



C. Comprehensive Watershed Management

1. TMDLs



What is the MSGP?

Multi-Sector General Permit (MSGP)

- Permittee (industrial facility) must:
Initiate activities that are effective in improving and protecting stormwater quality
- Permittee's responsibility to:
Interpret and implement the permit
- Certificate of No Exposure



Industrial facilities are required to obtain Stormwater Permit if...

- Facility has point source stormwater runoff associated with an industrial activity either discharging directly to:
 - Waters of the U.S.
 - Municipal Separate Storm Sewer System (MS4)
- **AND** either...
 - Primary SIC Code is regulated by the Industrial Stormwater Regulations
 - The North American Industry Classification System (NAICS) will eventually replace the SIC system. EPA provides conversion application
- **OR...**
 - Facility engages in one or more of the industrial activities identified by the EPA

Stormwater discharge associated with industrial activity means...

Any discharge from a stormwater conveyance system related to:

- Industrial Yards 
- Manufacturing processing
- Raw materials storage
- Material Handling 
- Refuse sites
- Immediate access roads & Rail Lines



These Areas include...

Storage and maintenance of equipment :

- Fleet maintenance
- Drydocks
- Material Handling



Storage areas for:

- Raw materials
- Intermediate and final products
- Tank Farms

Historical or “Legacy Exposure” industrial sites:

- Where significant materials remain and are exposed

IFSPPP Program Implementation Steps

- Distribute General Program Description Letter
- Distribute 3-Month Inspection Notification
- Perform Industrial Facility Inspections
- Review Inspection Results and QA/QC
- Issue Report with Follow-up Recommendations
- Commission Issues Industry Notification
- Industry Responsible for Preparing NOI or Certificate of No Exposure
- Re-inspect each Facility in Program Bi-Annually

2 Inventory List Development of Industrial Facilities

IFSPPP Inventory List

- Standard Industrial Classification (SIC Code)
- NAICS Association Starting Point
- MWRA IPP and Assessor's Data Added
- Each Record Geo-coded to Spatially Locate
- Geo-coded Records Loaded into the Facilities Feature Class in the Tracking Database

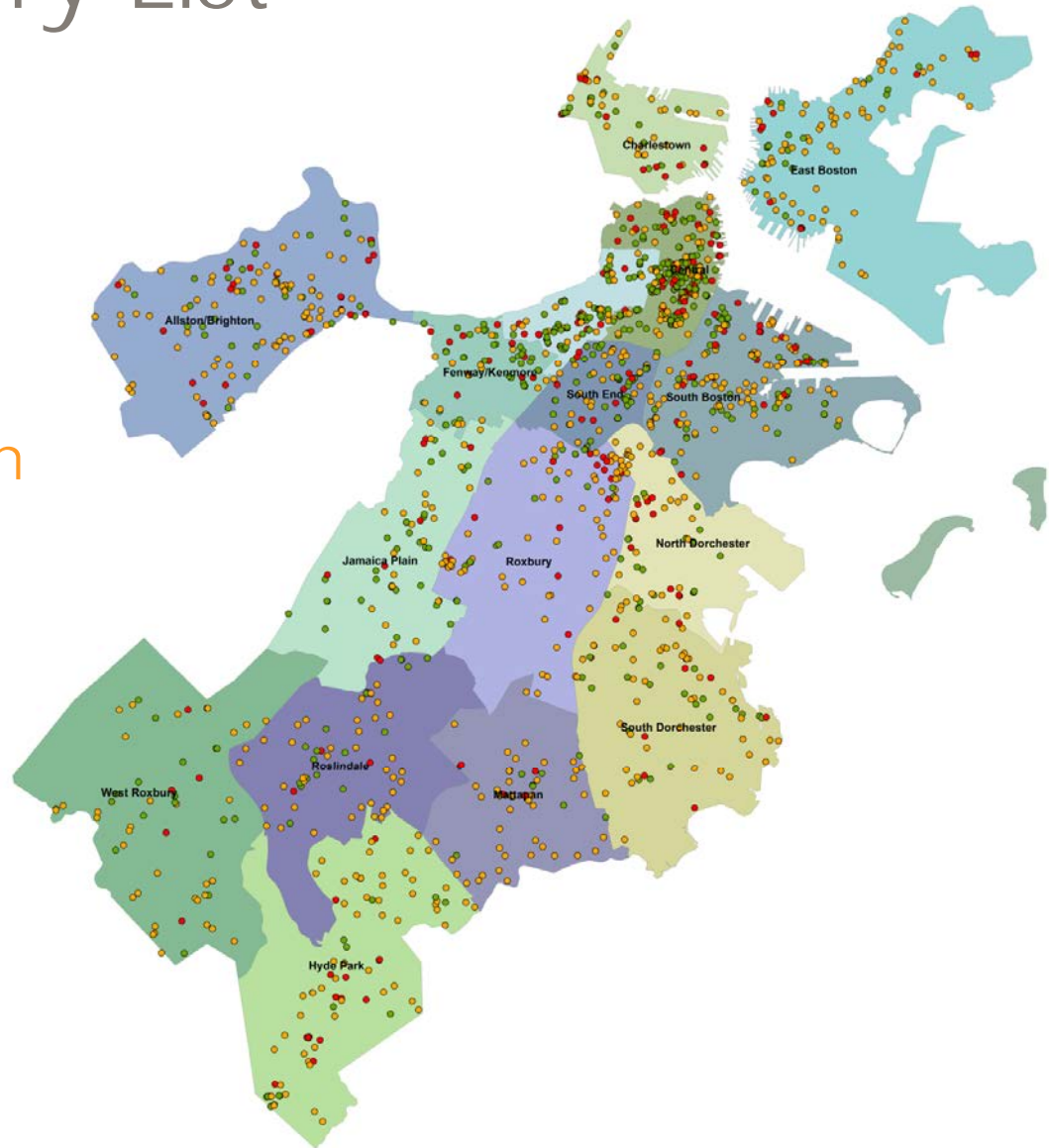
Initial Inventory List

- Data Sources

- MWRA
- Assessor
- NAICS Association
- BFD*
- BRA*
- BWSC*
- City Clerk*
- EPA*

- 1,760 Facilities

* Used as secondary source



3 Is Industry Eligible for Coverage Under Multi-Sector General Permit?

What is covered under MSGP?

Multi-Sector General Permit (MSGP)

(Industrial Stormwater General Permit)

- 10 categories of industrial activity
- 29 “sectors” of industrial activity

Recommended Internet bookmark:

- www.epa.gov/npdes/stormwater/msgp

10 Categories of Industrial Activity

- Category 1: All facilities subject to 40 CFR Parts 405-471
- Category 2: Heavy Manufacturing
 - Paper mills, chemical plants, petroleum refineries, and steel mills
- Category 3: Coal and mineral mining and oil / gas exploration
- Category 4: Hazardous waste treatment, storage, or disposal
- Category 5: Landfills, land application sites, and open dumps
- Category 6: Metal scrapyards, salvage yards, and junkyards
- Category 7: Steam electric power generating plants
- Category 8: Transportation facilities
 - Vehicle maintenance, equipment cleaning, or airport deicing operations
- Category 9: WWTPs treating domestic sewage (> 1 MGD)
- Category 10 Construction (Not Applicable SWPPP)
- Category 11: Light manufacturing
 - Food processing, printing and publishing, warehousing and storage

29 Classified Sectors of Industrial Activity

(Appendix D)

A: Timber Products
B: Paper Products
C: Chemical Products
D: Asphalt/Roofing
E: Glass, Clay, Cement
F: Primary Metals
G: Metal Mining
H: Coal Mines
I: Oil and Gas
J: Mineral Mining
K: Hazardous Waste
L: Landfills
M: Auto Salvage Yards
N: Scrap Recycling
O: Steam Electric Facilities

P: Land Transportation
Q: Water Transportation
R: Ship/Boat Building, Repair
S: Air Transportation
T: Treatment Works (WWTPs)
U: Food Products
V: Textile Mills
W: Furniture and Fixtures
X: Printing, Publishing
Y: Rubber, Misc. Plastics
Z: Leather Tanning/Finishing
AA: Fabricated Metal Products
AB: Transportation Equip.
AC: Electronic, photo goods
AD: Non-classified facilities

Boston's Top Five Industry Sectors Under IFSPPP

- P: Land Transportation 507
- X: Printing, Publishing 348
- AC: Electronic, photo goods 136
- U: Food Products 100
- V: Textile Mills 94

**Total Top Five Sectors = 1,185 Industries
(67%)**

4 Inspection Program

Commission has Authority to Conduct Inspections

“A. INSPECTION (Section 1 - Right of Access)

(a) Duly authorized representatives of the Commission may inspect the property or facilities of any user (including facilities under construction) to ascertain compliance with these Regulations or compliance with any permit issued pursuant to these Regulations...”

Prioritization of Industrial Inspections

Inspection Priority Levels

High

- Have large amount of outdoor activities.
- Close to receiving waters / drainage systems

Medium

- Have a SWPPP but limited outdoor activities

Low

- Limited outdoor facilities
- Not close to receiving waters / drainage systems

Note: High targeted for early inspections

Boston Industries Priority: **High – 276** **Medium – 654** **Low – 830**



155 Southampton Street

Sector P: Land Transportation and Warehousing

"Medium Level Facility"

Training Requirement

- Annual Refresher Training of Inspectors
- Training of New Inspectors within 30 days of Assignment to Perform Inspections

Field Inspection Process & Checklist

- An on-site inspection conducted at each facility
- Standard Operating Procedures (SOP) were developed to help guide the inspection process
- Working in partnership with the industry to address stormwater pollution

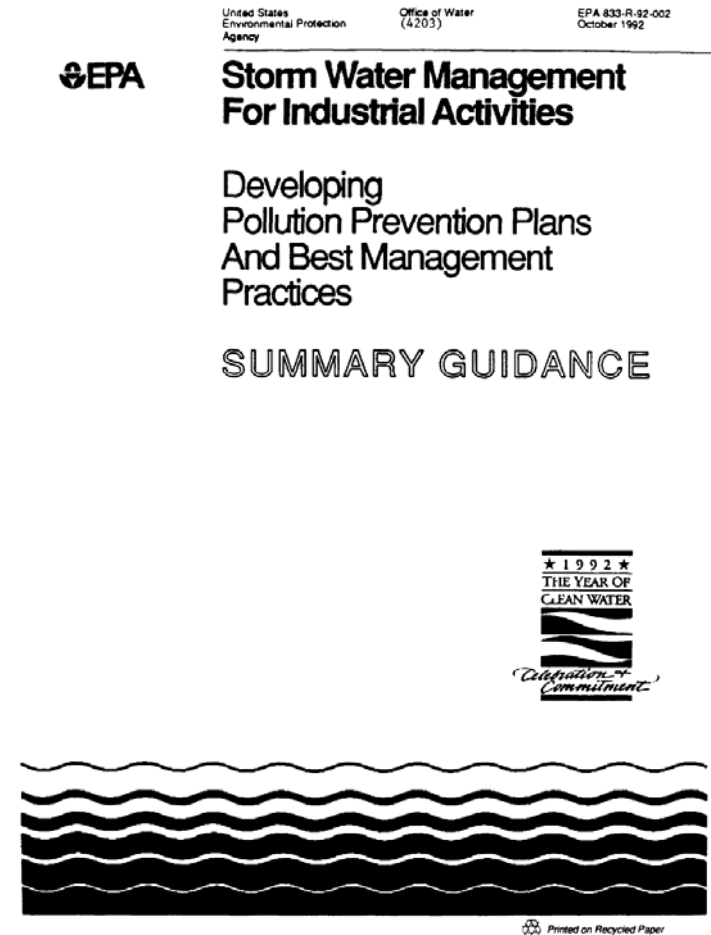
Field Inspection Process & Checklist

- Field Crews work off the assigned work lists.
- List facilities on the weekly location notification lists
- Field Crews follow a defined inspection process and checklist
- Upload inspections each day to portal
- Have hardcopy inspection forms available if necessary
- Ask Permission & Take photographs of all pertinent items
- Take detailed notes of issues and why letter recommendations

At the Heart of Each Inspection

Stormwater Pollution Prevention Plan (5 parts)

- ❖ Site Plan
- ❖ Stormwater Mgt. Plan
- ❖ Spill prevention & Response
- ❖ Prev. Maintenance & Housekeeping
- ❖ Employee training



5 Facility Inspections

Activities Polluting Stormwater

Industrial Facility Inspections

- Loading and unloading operations
- Outdoor storage
- Outdoor process activities
- Dust or particulate generating processes
- Illicit connections and non-stormwater discharges
- Waste management

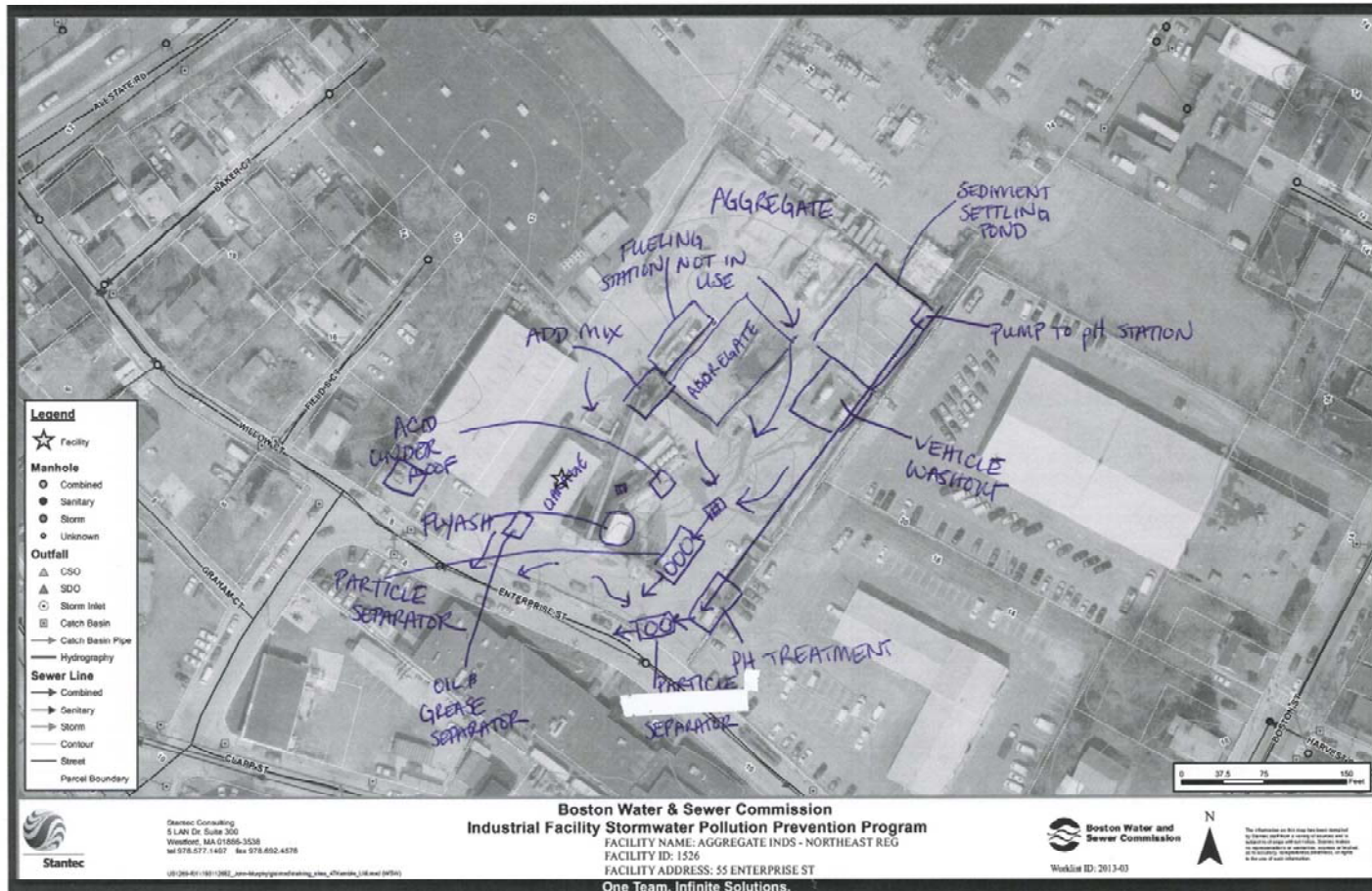


Some facilities may require no action or best management practices implemented where none exist

What to look for during an inspection



Supplemental Site Sketches



Inspection Application

iPad inspection application :

- Drop down menus for data entry
- Limit free form text
- Field training

Application “sync’d” with tracking database each evening through:

- wifi connection or
- tablet’s 4G network

Crews sync their iPad on daily basis

Post Inspection/Conclusions

Post Inspection

- Review information entered into iPad application for accuracy and that photo's confirm text
- Identified contact person met with and verify contact person for future correspondence and site visits
- Follow-up letter recommendation and describe findings and rationale why
- Upload inspection report to portal

Post Inspection/Follow-up

Quality control review

- Inspection report reviewed for completeness
- Contact to verify information.
- Follow-up Edits may be made to correct or revise information .

Letter Recommendations:

Letter 0: MSGP Does Not Apply

- Facility has moved or went out of business
- Facility is a Residence, Office Space or Commercial Establishment - No Industrial Activity
- Covered Under Another Permit

Letter 1:

- MSGP Applies with none or only minor issues

Letter 2:

- MSGP Applies with more serious deficiencies

Letter 3:

- Facility May Apply for Certificate of No Exposure

Letter 4:

- MSGP Applies & Water Quality Violations



SWPPP Best Management Practices (BMP)

Industrial Facility is responsible for:

- Development of a written stormwater pollution prevention plan
- Implementation of control measures
- Submittal of a request for permit coverage
- Site specific BMPs

SWPP Best Management Practices (BMP)

EPA Industrial Stormwater Fact Sheet Series available for each sector

INDUSTRIAL STORMWATER FACT SHEET SERIES



U.S. EPA Office of Water
EPA-833-F-06-031
December 2006

Sector P: Motor Freight Transportation Facilities, Passenger Transportation Facilities, Petroleum Bulk Oil Stations and Terminals, Rail Transportation Facilities, and United States Postal Service Transportation Facilities

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 land transportation and warehousing activities as defined by Standard Industrial Classification (SIC) Major Groups 40, 41, 42, 43, and SIC 5171. Facilities and products in this group fall under the following categories, all of which require coverage under an industrial stormwater permit:

- ◆ Motor freight transportation facilities (SIC 4212-4231)
- ◆ Passenger transportation facilities (SIC 4111-4173)
- ◆ Petroleum bulk oil stations and terminals (SIC 5171)
- ◆ Rail transportation facilities (SIC 4011, 4013)
- ◆ United States Postal Service facilities (SIC 4311)

Vehicle and equipment maintenance is a broad term used to include the following activities:

- ◆ Vehicle and equipment fluid changes
- ◆ Mechanical repairs
- ◆ Parts cleaning
- ◆ Sanding
- ◆ Refinishing
- ◆ Painting and/or fueling
- ◆ Locomotive sanding (loading sand for traction)
- ◆ Storage of vehicles and equipment waiting for repair or maintenance
- ◆ Storage of the related materials and waste materials, such as oil, fuel, batteries, tires, or oil filters

<http://water.epa.gov/polwaste/npdes/stormwater/Industrial-Fact-Sheet-Series-for-Activities-Covered-by-EPAs-MSGP.cfm>

6 Inspection Results

Examples of Industries Inspected

Types:

- Auto Salvage Yards
- Transportation & Warehousing
- Printing & Publishing
- Food Related Activities
- Mineral Processing Facilities
- Municipal Facilities
- Residential Businesses
- Corporate Offices

Auto Salvage Yards



Transportation & Warehousing



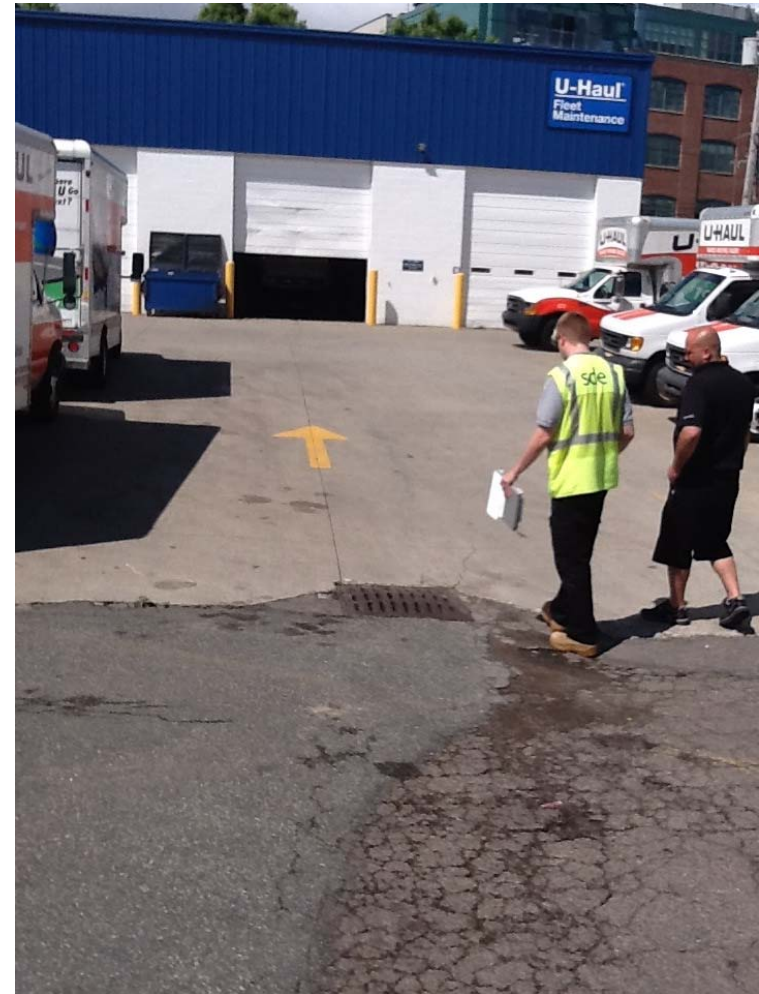
Fleet maintenance and storage exposed while employee parking not exposed.



Transportation & Warehousing



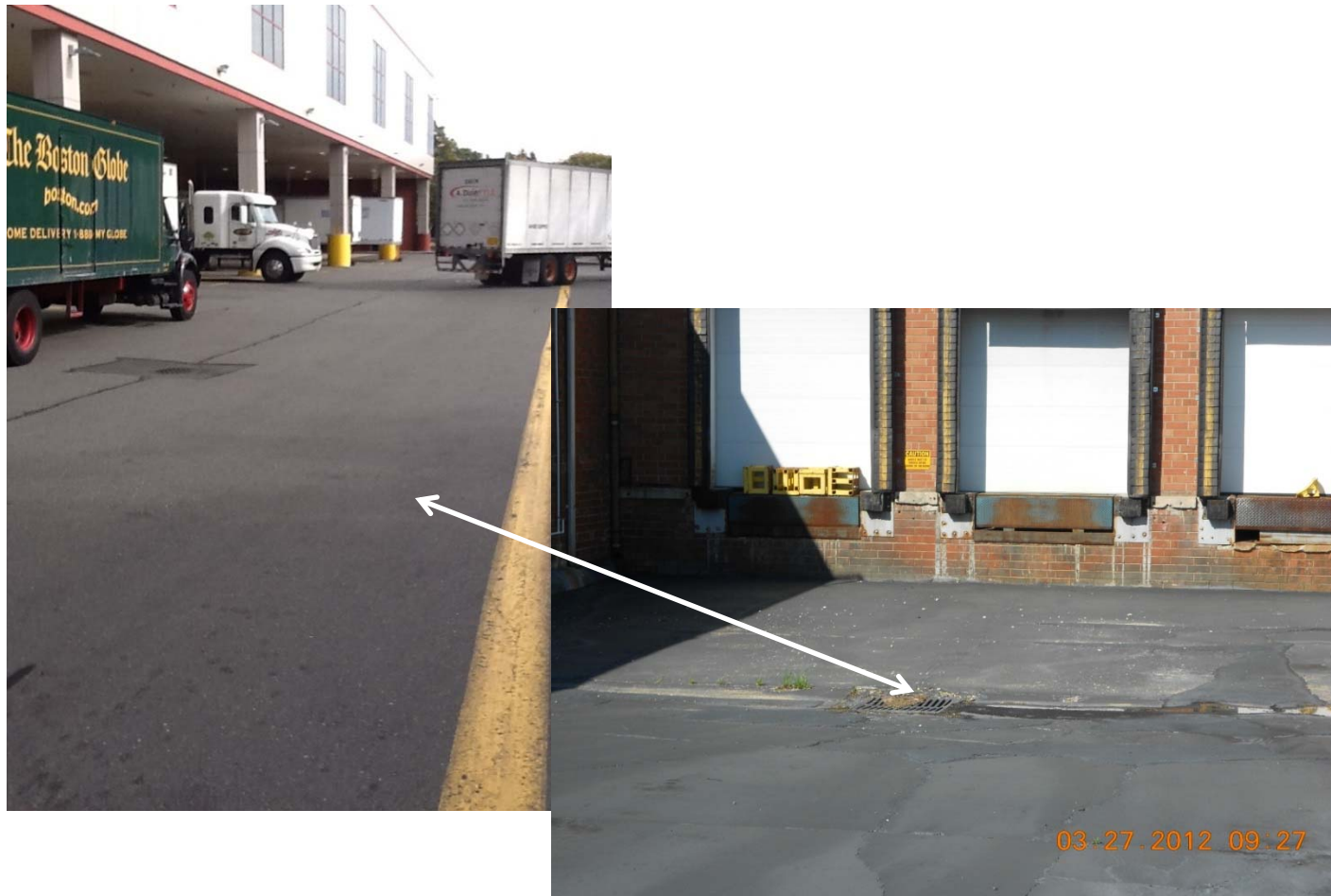
Transportation & Warehousing



Transportation & Warehousing

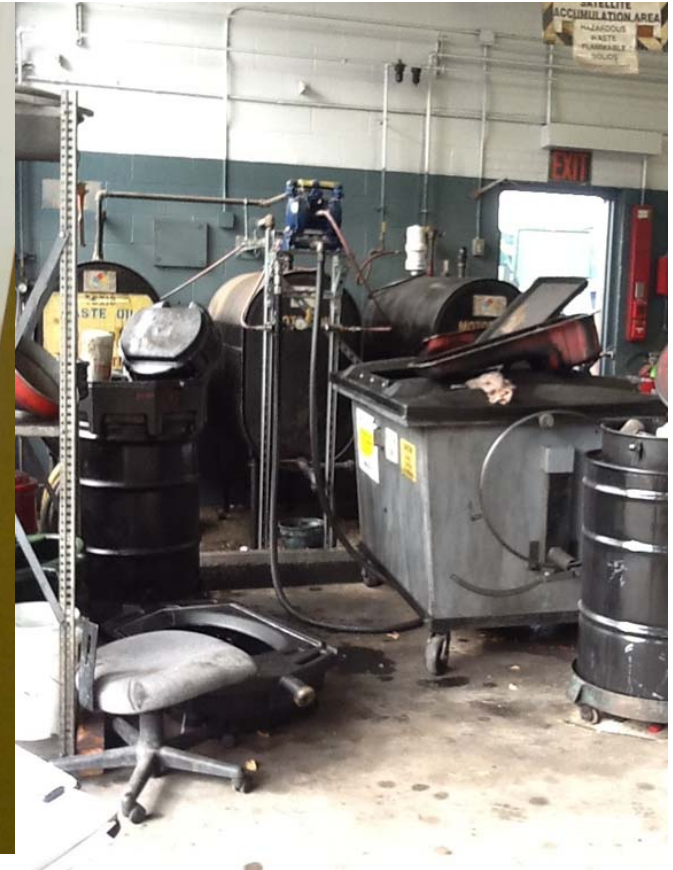


Printing & Publishing



Uncovered loading docks with central storm drain is asking for trouble!

Printing & Publishing



Printing & Publishing

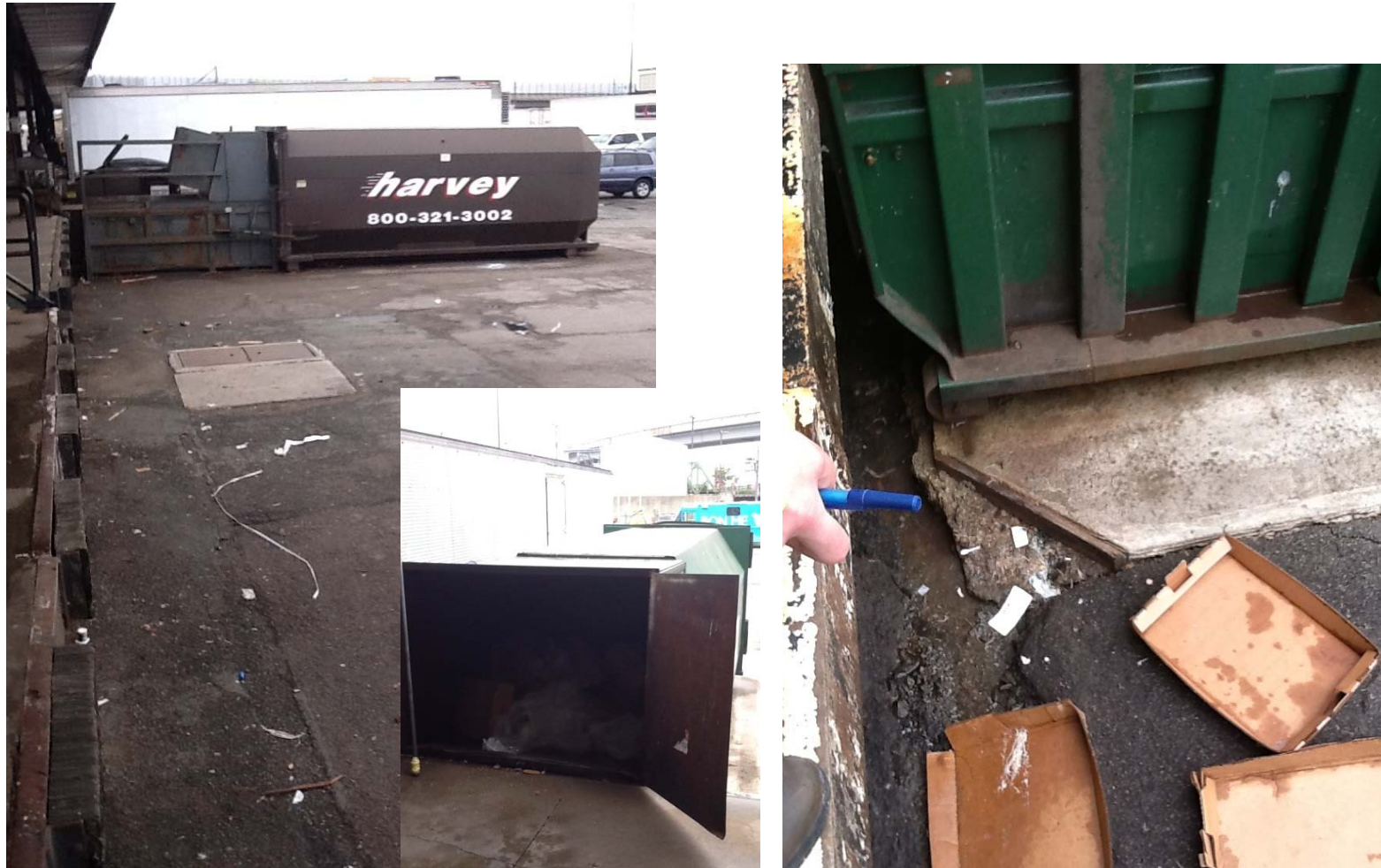


Food Related Facilities



Product Delivery, Processing and Chemical Storage Operations.

Food Related Facilities



Containers and Wash down Operations.

Mineral Processing Facilities



Product Delivery, Storage, Processing, Fueling
and Fleet Maintenance Operations.

Mineral Processing Facilities



**BMP Lagoons to Capture Runoff for
Onsite Treatment**

Municipal Operations



Municipal Operations



Covered Fueling Operations

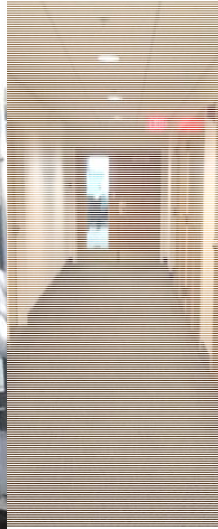
Businesses Out of Residences

Other locations in Boston?

Business From
Home

Mailing Address

Office or Mailing Address



Other locations in Boston?

Office Space

Commercial
Space

Statistics of Industries

Inspections Completed By Category:

Category	Category Description	Count of Facilities by Category
Category 1	All facilities subject to 40 CFR Parts 405-471	0
Category 2	Heavy Manufacturing	149
Category 3	Coal and mineral mining and oil / gas exploration	3
Category 4	Hazardous waste treatment, storage, or disposal	0
Category 5	Landfills, land application sites, and open dumps	0
Category 6	Metal scrapyards, salvage yards, and junkyards	14
Category 7	Steam electric power generating plants	0
Category 8	Transportation Facilities	475
Category 9	WWTPs treating domestic sewage (> 1 MGD)	0
Category 11	Light manufacturing	740
TRI	Toxic Release Inventory	46
None	No Category Description Available	91
Total Inspections		1,518

Facility Inventory Database

Original Master Inventory Database = 1,760 Facilities

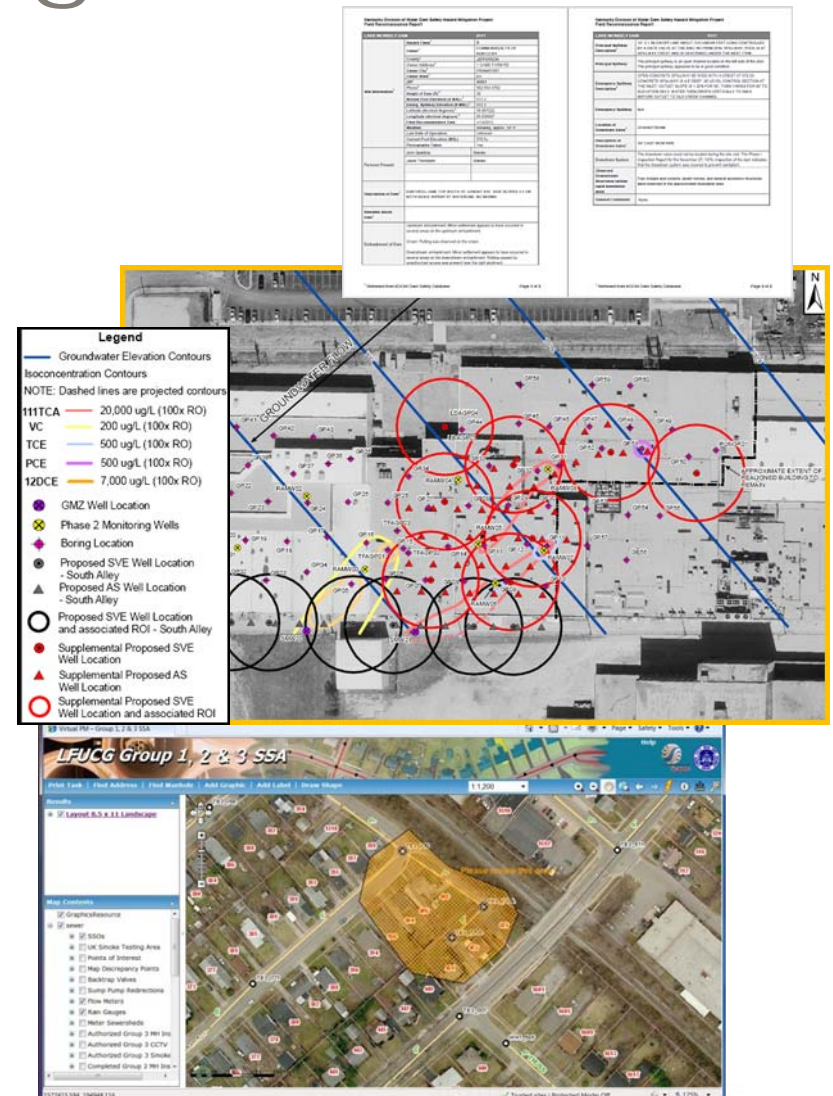
- New Facilities added to Database = 87
- Current Master Inventory Database = 1,847 Facilities
- Removed Facilities = 140
- Retired Facilities = 189
- **Active Facilities = 1,518 Facilities** (note: includes 48 facilities still awaiting inspection)
- **Active Facilities (Excluding Letter 0) = 464** (note: includes 48 facilities still awaiting inspection)

7 Data Collection & Information Management Portal Overview

Information Management

Portal Overview:

- Web-based portal
- Assists in managing the field data collection
- Portal serves as the interface to the database
- Promotes information exchange
- Near real time status tracking
- Report generation
- Integrated with CASSWORKS



BWSC Industrial Facility Pollution Prevention Program Portal



IFSPPP Portal

Facilities Inspections Map Admin

Signed in: ray.rush@stantec.com [Sign Out]

Facility Information >

Background Information >

Stormwater Pollution Prevention Plan/Spill Plan Review >

SWPPP & Site Maps >

Spill Prevention & Response Plan >

Monitoring >

Site Inspection >

Preventive Maintenance / Good Housekeeping >

Non-Stormwater Discharges >

Preliminary Results >

Sketch >

Photos >

C. Preliminary Results (answer in the opinion of the inspector)

Pollutant Potential (low=very little, if any exposed outdoor activity/chemicals; medium=some exposed outdoor activity/chemicals, some spills/leaks; high=exposed outdoor activity/chemicals with no secondary containment, spills/leaks evident)

☐ High ☐ Medium ☒ Low

In your opinion as the inspector the next steps should include: (Letter 1= none or only minor issues; Letter 2=more serious deficiencies at a facility are noted; Letter 3=No Exposure, Letter 4=water quality violation, immediate notification of BWSC)

☐ Letter 1 ☐ Letter 2 ☒ Letter 3 ☐ Letter 4

Preliminary Notes:

No chemical or solvents stored outside.

Sketch

Manage

A sketch is not assigned to this inspection.

Photos



AT&T LTE 5:33 PM 99%
Main Inspection Form Completed
Site Inspection

A. PREVENTATIVE MAINTENANCE / GOOD HOUSEKEEPING

1. Tanks / Other Containers

1a. Do they have chemicals stored in tanks or barrels that are exposed?
Yes No N/A Unknown

1b. Select the applicable types of containers:
Above ground tanks Below ground tanks Barrels Buckets

1c. Select the types of chemicals stored:
Hydraulic Fluid Fuel Oil Paint Other

1d. Do ALL containers have secondary containment?
Yes No N/A Unknown

1e. Is there evidence of leaks from the containers?
Yes No N/A Unknown

1f. Are ALL containers properly labeled with their contents?
Yes No N/A Unknown

2. Dumpster or Trash Compactors

2a. Are dumpsters/trash compactors covered to limit exposure?
Yes No N/A Unknown

2b. Is there evidence of leaks from the dumpsters/trash compactors?
Yes No N/A Unknown

3. Vehicle & Equipment Storage or Repair

3a. Are vehicles or equipment located outside with the risk of exposure?

Form Photos

Project Description

To manage an Industrial Facility Pollution Prevention Program, we implemented tablet-based offline data collection. Data was sent to a database-driven web portal for data review, storage, and reporting.

Key Features

- File Management
- Data Tracking and Reporting
- Tablet Data Collection
- Web GIS

Software

- ASP.Net 4.0 (C#.Net)
- JavaScript
- ArcGIS Server, JavaScript API
- SQL Server 2008 R2

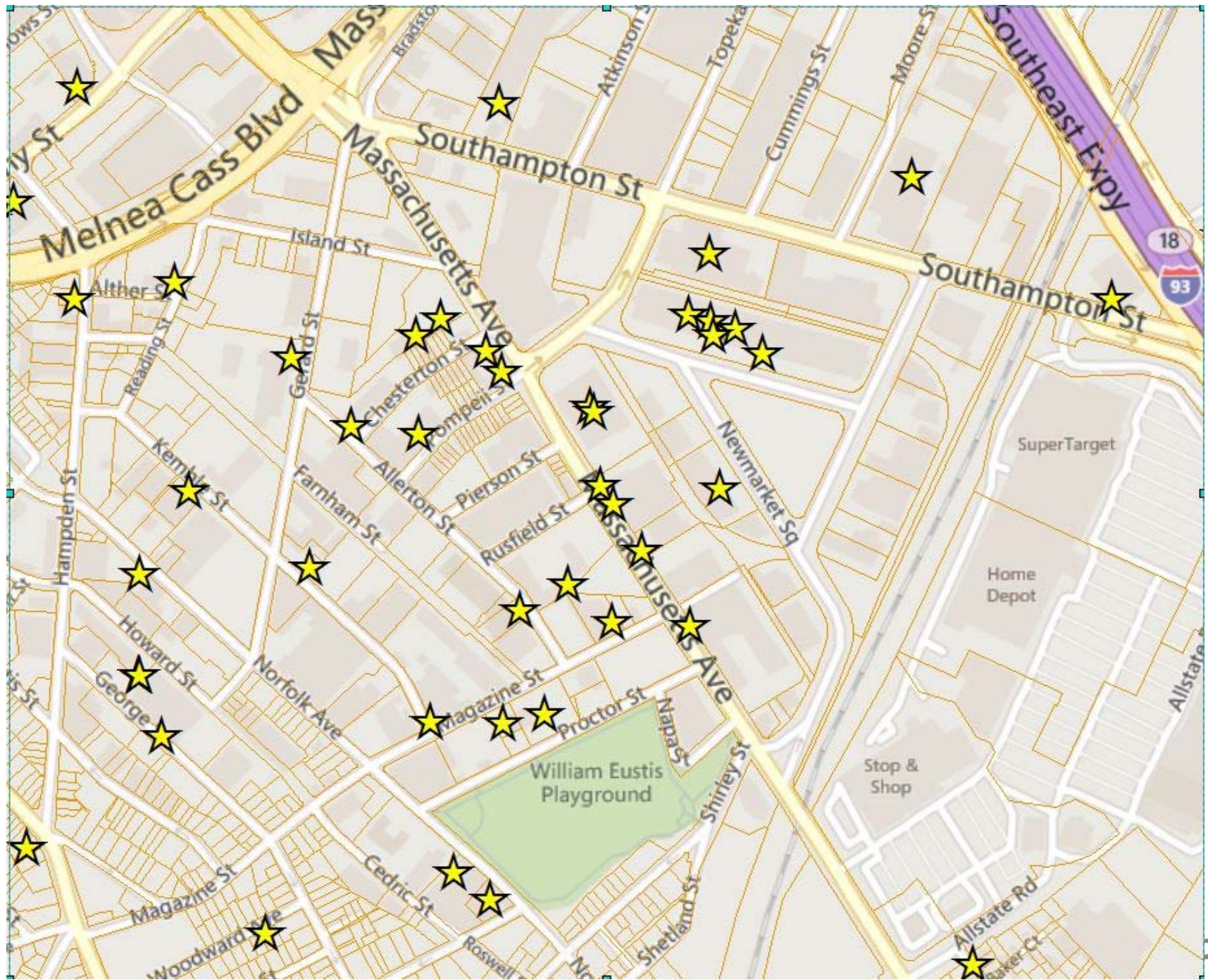
User Community

- Boston Water and Sewer Commission (BWSC)
- Stantec
- Subcontractors
- State and Federal Agencies

Dates

- 2013 to present

Hosted on Stantec Servers
(Amazon EC2)



Legend



Facility

Manhole

- Combined
- Sanitary
- Storm
- Unknown

Outfall

- CSO
- SDO
- Storm Inlet
- Catch Basin Pipe
- Hydrography

Sewer Line

- Combined
- Sanitary
- Storm
- Contour
- Parcel Boundary



Worklists Status

Click the Worklist name to show all facilities in that Worklist on the Facilities page.

10 records per page

Search entire table:

Worklist ▲	Team ▴	Status ▴	Due Date ▴	Total Facilities ▴	Awaiting ▴	Sent ▴	Completed ▴	Last Activity ▴
2013-01	SDE	WORKING	7/5/2013	24	0	0	24	7/23/2013
2013-02	SDE	WORKING	7/5/2013	22	0	0	22	8/15/2013
2013-03	SDE	COMPLETE	7/5/2013	21	0	0	21	7/2/2013
2013-04	SDE	COMPLETE	7/5/2013	21	0	0	21	7/2/2013
2013-05	VHB	WORKING	8/22/2013	25	0	0	25	8/13/2013
2013-06	VHB	WORKING	8/22/2013	25	0	0	25	10/29/2014
2013-07	VHB	WORKING	8/22/2013	25	0	0	25	7/15/2014
2013-08	VHB	WORKING	8/22/2013	25	0	0	25	8/22/2013
2013-09	SDE	WORKING	8/22/2013	24	0	0	24	10/7/2014
2013-10	SDE	WORKING	8/22/2013	25	0	0	25	9/25/2013

Showing 1 to 10 of 75 entries

← Previous 1 2 3 4 5 Next →

Facilities

Click the Facility Id to view the Facility Details. Click the map link to view the site on a map.

Worklist:

10 records per page

Search entire table:

Id	Name	Compliance Status	Inspected	Inspection Date	Worklist	Map
1375			Yes	6/5/2013	2013-03	map
1410	American Nut & Chocolate Inc		Yes	6/5/2013	2013-03	map
1411	London Veal Company Inc		Yes	6/5/2013	2013-03	map
1412	Mutual Beef Co Inc		Yes	6/5/2013	2013-03	map
1414	Chinese Spaghetti Factory Inc		Yes	7/2/2013	2013-03	map
1426	Bombadier Transportation		Yes	7/2/2013	2013-03	map
1525	Airgas - East Inc		Yes	6/6/2013	2013-03	map
1526	Aggregate Inds - Northeast Reg		Yes	6/11/2013	2013-03	map
1536	M A Peacard Co		Yes	6/6/2013	2013-03	map
1537	City Fresh Foods Inc		Yes	6/6/2013	2013-03	map

Showing 1 to 10 of 21 entries (filtered from 1,743 total entries)

[← Previous](#)
[1](#)
[2](#)
[3](#)
[Next →](#)

[Facilities](#) / 2186

Company Name: U-Haul Co Of Massachusetts

Facility ID: 2186

Address: 985 Massachusetts Ave, Boston

Contact Person: George White

Program Status: Active

Worklist: 2013-02

Industrial Activity: Motor Freight Transportation and Warehousing

SIC Code: 4225

Note:
Site map download: [Facility_2186.pdf](#)
Compliance Status:
Inspection Priority: Medium

Phone: 617-567-2630

Title: Branch Manager

Letter Status:
[Show on Map](#)

Activity History

10 ☐ records per page

Search entire table:

Activity Id	Regulatory Type	Classification	Type	Status	Activity Date	Modified On
1672	INS	ROU	LTR		3/11/2013	8/22/2013
2896	INS	ROU	LTR		5/10/2013	8/22/2013
4914	ENF	ENF	LTR		10/11/2013	1/8/2014
4933	ENF	ENF	LTR		10/29/2013	1/8/2014
52	INS	ROU	INS	CMP	6/12/2013	2/4/2014
5418	INS	ROU	VIS		10/28/2013	3/27/2014

Showing 1 to 6 of 6 entries

[← Previous](#) [1](#) [Next →](#)

Facility Information >

Background Information >

Stormwater Pollution Prevention Plan/Spill Plan Review >

SWPPP & Site Maps >

Spill Prevention & Response Plan >

Monitoring >

Site Inspection >

Preventive Maintenance / Good Housekeeping >

Non-Stormwater Discharges >

Preliminary Results >

Sketch >

Photos >

Facility Information

Company Name: U-Haul Co Of Massachusetts

Address: 985 Massachusetts Ave, Boston

Contact Person: George White

Facility ID: 2186

Industrial Activity: Motor Freight Transportation and Warehousing

Date: 6/12/2013

Phone: 617-567-2630

Title: Branch Manager

Inspection Priority: Medium

SIC Code: 4225

Inspector

Background Information

1. Does the facility have any materials, chemicals or industrial activity that are exposed?

☐ Yes ☐ No ☐ N/A ☐ Unknown

2. Does the site require a site inspection?

☒ Yes ☐ No ☐ N/A ☐ Unknown

3. If no, why not?

4. Does the facility have an existing permit?

☐ Yes ☒ No ☐ N/A ☐ Unknown

5. If so, what type (NPDES Stormwater, MWRA Sewer Use)?

6. Does the facility have a certificate of No Exposure?

☐ Yes ☒ No ☐ N/A ☐ Unknown

Background Notes:

Site Inspection

[Facility Information >](#)
[Background Information >](#)
[Stormwater Pollution Prevention Plan/Spill Plan Review >](#)
[SWPPP & Site Maps >](#)
[Spill Prevention & Response Plan >](#)
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[Non-Stormwater Discharges >](#)
[Preliminary Results >](#)
[Sketch >](#)
[Photos >](#)

A. PREVENTATIVE MAINTENANCE / GOOD HOUSEKEEPING

1. Tanks / Other Containers

1a. Do they have chemicals stored in tanks or barrels that are exposed?

☐ Yes ☒ No ☐ N/A ☐ Unknown

1b. Select the applicable types of containers:

☒ Above ground tanks ☐ Below ground tanks ☒ Barrels ☐ Buckets

1c. Select the types of chemicals stored:

☐ Hydraulic Fluid ☐ Fuel ☒ Oil ☐ Paint ☒ Other

1d. Do ALL containers have secondary containment?

☒ Yes ☐ No ☐ N/A ☐ Unknown

1e. Is there evidence of leaks from the containers?

☐ Yes ☒ No ☐ N/A ☐ Unknown

1f. Are ALL containers properly labeled with their contents?

☒ Yes ☐ No ☐ N/A ☐ Unknown

2. Dumpster or Trash Compactors

2a. Are dumpsters/trash compactors covered to limit exposure?

☐ Yes ☒ No ☐ N/A ☐ Unknown

2b. Is there evidence of leaks from the dumpsters/trash compactors?

☐ Yes ☒ No ☐ N/A ☐ Unknown

3. Vehicle & Equipment Storage or Repair

3a. Are vehicles or equipment located outside with the risk of exposure?

☒ Yes ☐ No ☐ N/A ☐ Unknown

3b. What activities take place outside with risk of exposure?

☒ Parking ☐ Fueling ☐ Washing ☐ Repair ☐ Other



8 Transitioning Program to BWSC

Transition Activities

Assist Commission to Incorporate into Operations:

- Database Transfer
- Portal Application
- Training Requirements
- Annual Updating of the Industrial Facility Inventory

Questions? And Discussion

