



## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

**E**ffective August 31, 2001, the [Part 5 Spillage of Oil and Polluting Materials administrative rules](#) promulgated pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) MCL 324.3101 *et seq.* were revised. The previous rules were rescinded and new rules (R324.2001 through R324.2009) promulgated to address release prevention planning, secondary containment, surveillance, and release reporting requirements. When a rule is referenced in this document, it will list Rule and a number that corresponds with the above citations. For example, Rule 1 is R324.2001. Oversight of these rules was transferred to the Water Division when the Michigan Department of Environmental Quality (DEQ) was reorganized in 2002. This updated informational packet addresses the requirements overseen by the Water Division (WD), clarifications of interpretations regarding oils managed under federal SPCC regulations and submittal of notices and certifications, along with discussion about potential relationships with some other regulations.

- I. Summary of revised rules primary changes
- II. Acronyms used in publication
- III. What facilities are subject to the Part 5 Rules?
- IV. Answers to commonly asked questions
- V. PIPP completeness review checklist
- VI. Additional information to use when preparing a PIPP and completing the checklist
- VII. Websites used in publication

### **I: SUMMARY OF REVISED RULES PRIMARY CHANGES**

1. The Critical Materials Register is no longer referenced in the Part 5 polluting material definition. Polluting materials are salt, oil, any chemical included in Rule 9, and any compound or product that contains 1% or more, by weight, of these materials [based on the material safety data sheet (MSDS) formulation information].
2. The new rules clarify the definition of oils and expand the definition of salt. Salt includes sodium chloride, potassium chloride, calcium chloride, magnesium chloride, and solutions or mixtures of these compounds in either solid or liquid form.
3. The new rules identify threshold management quantities (TMQs) for both indoor and outdoor use, storage, and other management areas. Exceeding these TMQs and meeting facility definitions will determine if a PIPP has to be prepared, if containment is required, and if other Part 5 rules must be met. Previous rules did not have minimum volumes identified.
4. The new rules include descriptive conditions and threshold reporting quantities (TRQs) for polluting materials which if exceeded, or occur, requires spills or releases to be reported. What is considered as a release under these rules is also clarified. Previous rules did not identify minimum reportable quantities.
5. The new rules include facility exemptions from certain requirements if they meet specified conditions or are subject to other identified regulations. Previous rules did not have exemptions listed.

## Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet

6. The new rules require the PIPP to be kept at the facility and available for inspection. Within 30 days of completing the plan, the facility must notify that it is in full compliance with the Part 5 Rules to the WD district office that oversees the area where the facility is located. In addition, the facility must notify the [Local Emergency Planning Committee \(LEPC\)](#) and [local health department](#) that the plan has been completed and available upon request. The facility must submit a copy to a requesting agency within 30 days of receiving a request.
7. The new rules require the plans to be evaluated every three years or after any release that requires implementation of the plan. The plan must be updated whenever there are changes to personnel, processes, or procedures identified in the plan. The facility must re-notify the DEQ and locals and recertify compliance when the plans are updated.
8. The new rules clarify the definition of on-land and oil storage facilities and include exemptions for some types of facilities.
9. The new rules provide clarification about secondary containment requirements. Required holding capacity is now consistent with the hazardous waste regulations, e.g., not less of the total volume of the tanks or containers within the secondary containment structure or provide a capacity of 100% of the largest single tank or container within the secondary containment structure, whichever is larger.

### II: ACRONYMS USED IN PUBLICATION

<p><b>AWR</b> Annual Wastewater Report</p> <p><b>CAA</b> Clean Air Act</p> <p><b>CAS</b> Chemical Abstracts Service Number</p> <p><b>CERCLA</b> Comprehensive Environmental Response, Compensation and Recovery Act</p> <p><b>CIS</b> Michigan Department of Consumer and Industry Services</p> <p><b>DEQ</b> Michigan Department of Environmental Quality</p> <p><b>EPA</b> US Environmental Protection Agency</p> <p><b>ICP</b> Integrated Contingency Plan</p> <p><b>HAZWOPER</b> Hazardous Waste Operations and Emergency Response</p> <p><b>LEPC</b> Local Emergency Planning Committee</p> <p><b>LQG</b> Large Quantity Generator</p>	<p><b>MCL</b> Michigan Compiled Laws</p> <p><b>MIOSHA</b> Michigan Occupation Safety and Health Act</p> <p><b>MSDS</b> Material Safety Data Sheet</p> <p><b>PE</b> Professional Engineer</p> <p><b>PEAS</b> Pollution Emergency Alerting System</p> <p><b>PIPP</b> Pollution Incident Prevention Plan</p> <p><b>SPCC</b> Spill Prevention, Control, and Countermeasure</p> <p><b>TMQ</b> Threshold Management Quantity</p> <p><b>TRI</b> Toxic Chemical Release Inventory</p> <p><b>TRQ</b> Threshold Reportable Quantity</p> <p><b>UST</b> Underground storage tank</p> <p><b>WHMD</b> Waste and Hazardous Materials Division</p> <p><b>WD</b> Water Division</p>
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### III: WHAT FACILITIES ARE SUBJECT TO THE PART 5 RULES?

Review the administrative rules and ask the following questions when determining if the Part 5 requirements for a PIPP, containment, surveillance, and release reporting apply.

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

1. Does the facility meet the definition of an oil storage or on-land facility per Rule 1(f) or (g)?

An oil storage or on-land facility excludes recreational marinas, installations of oil containing electrical equipment, oil storage facilities, oil field petroleum or oil field brine storage facility, and transportation related facilities as defined in 40 CFR Part 112.

- A. Recreational marinas are places where private pleasure boats are located. A commercial marina includes places where commercial boats and ships (commercial charter and fishing boats, freighters, cruise ships, ferries, etc) are located.
- B. The electrical equipment must be in active use to be exempted from the Part 5 rules. The volume of oil in electrical equipment in storage (non-energized electrical equipment) must be counted if it does not meet the small container exemptions in Rule 3(1). Examples of equipment include electrical transformers, capacitors, reclosures, voltage regulators, rectifiers, etc.
- C. Transportation related facilities includes some onshore and offshore facilities and equipment used for handling or transferring oil in bulk from vessels, pipelines, highway vehicles and railroad cars used for interstate and intrastate commerce. Call 312-353-8200 to discuss this transportation related determination with EPA Region V. See the [WD operational guidance](#) regarding railroad and truck unloading areas.

2. Does the facility have polluting materials that meet the small container exemption or are regulated by another program listed in Rule 3?

When looking at the conditional exemptions under Rule 3, keep in mind that a facility may have some polluting materials exempted, and still have other polluting materials in amounts that are subject to the Part 5 rules.

- A. Polluting materials in small containers that:
  - ✓ do not individually exceed 10 gallons, or 100 pounds, AND
  - ✓ are managed indoors, AND
  - ✓ the facility has adequate safeguards to prevent releases.

This would apply to retail stores and facilities that use products in small amounts, or in small containers, and meet all of the rule conditions. This exemption would include small lead acid batteries containing sulfuric acid, and smaller capacitors, ballasts, or other items containing small amounts of oils under storage conditions. Batteries used for fork lifts or hi-lows usually do not meet this exemption because they exceed this size and are often used outdoors.

- B. The conditional exemption in Rule 3(1)(b) is no longer applicable to oils because US EPA revised 40 CFR 112 in 2002 and the Part 5 rules adopt the 1997 Spill Prevention, Control and Countermeasure (SPCC) regulations (40 CFR Part 112) version. See discussion under point 3.B. regarding oil TMQs.
- C. [Flammable and combustible liquids](#) under the Michigan Fire Protection Code regulations overseen by the DEQ Waste and Hazardous Materials Division (WHMD). This would include liquids with flashpoints below 200 degrees Fahrenheit stored in certain aboveground storage tanks and containers and underground storage tanks. See the regulations regarding if the flammable and combustible materials on-site fall under these regulations. If the tank or container is exempted under these regulations, for example process tanks, then it will be necessary to determine if the liquid is a polluting material and the facility meets or exceeds TMQs. Direct questions about storage tank regulations to the WHMD District Office.

## Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet

- D. [Petroleum and hazardous substances](#) under the underground storage tank regulations overseen by the DEQ WHMD. Regulated substances in UST include substances listed in Section 112 of Part A of Title I of the Clean Air Act (CAA), hazardous substances listed in the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), and petroleum based substances that meet specific conditions and include motor fuels, jet fuels, distillate fuel oils, residual fuel oils, lubricants, and petroleum solvents. This would also include delivery pipelines in subdivisions from a large UST that supplies those homes. See the storage tank regulations for more specific definitions and the federal [List of Lists](#) which includes the CERCLA and CAA substances. If the tank or container is exempted under these regulations, for example process tanks, then it is necessary to determine if the liquid is a polluting material that exceeds TMQs. Direct questions about storage tank regulations to the WHMD District Office.
- E. [Hazardous waste](#) managed under regulations overseen by the DEQ WHMD. This would include both federal and Michigan listed and characteristic hazardous wastes managed by generators, transporters, and treatment, storage and disposal facilities. Contact the WHMD District Office regarding questions about hazardous waste regulations.
- F. Polluting materials at [oil and natural gas](#) exploration sites overseen by the DEQ Geological and Land Management Division (GLMD) regulations. This would include materials at well sites that are regulated under Part 615, Supervisor of Wells, of Act 451. Brine and petroleum at oil and gas sites are excluded under the Part 5 facility definition.
- G. Note that [liquid industrial wastes](#) are not specifically exempted in Rule 3, so it will be necessary to determine if the waste is subject to the Part 5 rules. It will depend if the concentration of the waste exceeds 1% of polluting materials and the volume exceeds the TMQ. If the products originally used contained 1% or more of a polluting material, it would be necessary to calculate if the polluting materials concentration in the waste would exceed 1%.
3. Does the facility have polluting materials in regulated TMQs per Rule 2(f)? See Rule (2)(a) for what is, or isn't, a polluting material. Polluting materials include oils, salt, and chemicals listed in Rule 9 and mixtures containing more than 1% of these materials. Rule 2(a)(v) exempts manufactured items from polluting materials and these would not be included in calculating the TMQ. Manufactured item is defined in Rule 1(d). Some common manufactured items that would be excluded would include rolls of steel, formed metal products, and scrap metal.

A good place to start identifying all the polluting materials on-site is by looking at the material safety data sheets (MSDS) the facility must have to meet the MIOSHA regulations. Use the MSDS information to identify if there are polluting materials on-site and to compile the inventory that must be listed in the PIPP (see page 20). Walk through the facility to locate where the materials are stored and used and determine if the storage and use conditions listed on the MSDS are being followed.

### A. Salt:

- ✓ [Any location](#) that has 1000 gallons or more of salt in liquid form.
- ✓ [Any location](#) that has 5 tons or more of salt in solid form. This would include salt and sand mixtures that contain 1% or more of salt.

It would be necessary to include salt located anywhere on the contiguous property except for:

- Small containers that meet the exemption in Rule 3(1)(a), or
- Brine storage facilities exempted in Rule 1(f) and (g) because they are part of an oil field petroleum facility.

### **Salt includes:**

- Sodium chloride
- Potassium chloride
- Calcium chloride
- Magnesium chloride
- Solutions or mixtures of these compounds

For more salt storage information, request a copy of the *"Salt and Brine Storage Manual"* by calling the Environmental Assistance Center at 800-662-9278. Note: this document is under revision and will be available on the Internet when completed.

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

B. Oil or fuel storage areas with ABOVEGROUND HOLDING CAPACITY of the following amounts:

- ✓ 660 gallons or larger holding capacity in any single tank or container, or
- ✓ 1,320 gallons or larger total capacity of all oil tanks, drums, and other containers anywhere on-site.

1) Some examples of capacity volumes and materials that need to be included when calculating the TMQ for Part 5 rules:

- a. Capacity of all containers of oil that do not meet the small container exemption would be included when calculating the Part 5 rule TMQ.
- b. Products and liquid industrial waste containing 1% or more regulated oils would be included. Examples of these types of oils that need to be evaluated include facilities with oil water separators and restaurants with grease trap or interceptor vessels with capacity of 660 gallons or more in size, or have capacity to have 1320 gallons or more of all oils on site, and printers with soy based inks containing 1% or more soybean oil. Oils that are below the Part 5 or SPCC oil TMQs and contain 1% or more of other polluting materials, for example zinc, would need to be included in the discrete area TMQ calculations discussed below.
- c. Storage tanks located in a vault would be considered an aboveground tank if it does not come into contact with soil and would need to be counted if meet the TMQ. This is consistent with EPA's position with SPCC.

2) Some examples of oil capacity volumes and materials not included when calculating the TMQ for Part 5 rules:

- a. Molten or liquid asphalt is not considered oil under the Part 5 rules. The federal SPCC regulation does include asphaltic cement (commonly called tar).
- b. Oils that meet the conditional exemptions listed in Rule 3
- c. Oil containing mobile hydraulic devices because it is transportation related.
- d. Installations of oil containing electrical equipment, because the oil is excluded in the definitions in Rule 1(f) and (g), but those oils may be included under SPCC regulations. The volume of oil in electrical equipment in storage (non-energized electrical equipment) must be counted towards Part 5 TMQ if it does not meet the small container exemption in Rule 3(1). Examples of equipment include electrical transformers, capacitors, reclosures, voltage regulators, rectifiers, etc.

### ***Oil in any form or kind includes:***

- Animal fats
- Fuel oil
- Gasoline
- Oil mixed with waste
- Oil refuse
- Oily sludges
- Petroleum
- Synthetic oils
- Used oil
- Vegetable oils

***NOTE: Due to the language in the definitions of facility in Rule 1 and the changes in federal SPCC requirements, it has been determined that the exemption in Rule 3(1)(b) for oil is no longer applicable.*** It has been determined that oil storage facilities that meet, or are above, oil TMQ would only be subject to surveillance requirements in Rule 4, use and indoor storage requirements in Rule 5(3), and release reporting as required by Rules 2 and 7. Releases that must be reported under Part 5 rules are different from the federal release reporting requirements. Oil storage facilities are not subject to the requirements for a PIPP in Rule 6 and secondary containment in Rule 5(1) and (2). However, a facility may be required to prepare and implement a SPCC plan, have secondary containment, and meet additional requirements under the federal [SPCC regulations](#) overseen by EPA if a site has 1320 gallons or more storage capacity of all oils on-site and a release could reach navigable waters. It is not necessary to include containers less than 55 gallons when calculating federal TMQ. Per EPA, most Michigan sites would meet the condition regarding releases having the potential of reaching navigable waters. This would include facilities that discharge oil into groundwater or have storm water run-off which may flow into navigable waters. Oils may also be subject to the tank and flammable and combustible liquid regulations as noted previously.

## Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet

- C. Materials listed in Rule 9 at in on-land facility's discrete storage or use areas if in the following amounts:
- ✓ 2200 pounds (1000 kilograms) or more in indoor locations
  - ✓ 440 pounds (200 kilograms) or more at outdoor locations

Facilities may have separate locations, which would be considered discrete areas, where polluting materials listed in Rule 9 are used or stored in amounts over the TMQ. For example, there could be distinct points on a long process line where polluting materials are used, or there could be both outdoor and indoor storage areas. See Rule 1(c) for the definition of "indoors." A totally enclosed storage shed would be considered "indoors." A storage tank located in a vault would be considered an aboveground tank if it does not come into contact with soil. A company should not artificially designate an area as a discrete location to avoid the regulations. When determining if an area is "discrete," consider if a release from that area would impact a different discrete area. If the answer is yes there would be an impact, then they are not two separate discrete areas.

When reviewing the materials listed in Rule 9:

- Note the pounds listed in the table are threshold reporting quantities (TRQs) and are NOT used for calculating TMQs. The listed weight is to be used to determine if a release must be reported.
  - It is recommended to first look for chemicals by the chemical abstracts service (CAS) number since a chemical could have several different synonyms and a particular name may not be included on the list even though the CAS number is listed under a synonym.
  - Also check Rule 9 by the material name since there are polluting materials that do not have a CAS number listed.
  - Add the amount of ALL the non exempt polluting materials located in a discrete area, and if applicable, include the weights of polluting materials that are in mixtures as noted in point D below. It is not necessary to include the smaller containers (less than 10 gallons or less than 100 pounds), or other exempted materials in Rule 3 IF all the conditional exemptions are met.
- D. Any compound or product that contains 1% or more by weight, of any of the above listed materials (oils, salts, and chemicals listed in Rule 9) based on material safety data sheet (MSDS) information.

Many facilities have products which are mixtures of different chemicals, oils, or salts. Use the MSDS to identify what polluting materials are in the products/materials on-site that have 1% or more by weight of the listed polluting materials in the formulation. When calculating TMQs, include the total weight of a container's contents if the mixture exceeds 1% or more by weight of polluting materials. If the MSDS lists the information as proprietary, contact the manufacturer and/or supplier to see if they would provide a determination if their product contains listed chemicals and if so, the weight per container so you can calculate the amount you have on-site. In some situations, you may want to contact the supplier to see if it is possible to revise the product formulation to eliminate or reduce the amount of the polluting material. Liquid industrial wastes containing more than 1% of polluting materials would also need to be included when calculating TMQs.

To find the list of [polluting materials](#), go to [www.michigan.gov/deq/](http://www.michigan.gov/deq/) and click on "Assistance & Support Services," "Environmental Reporting," then "Emergency Planning" and select PIPP. Under the Part 5 Rule link, there are two lists of the Rule 9 polluting materials. One is arranged alphabetically, the other is arranged numerically by CAS number. It is recommended to first look for chemicals by the chemical abstracts service (CAS) number since a chemical could have several different synonyms and a particular name may not be included on the list even though the CAS number is listed under a synonym. Also check Rule 9 by the material name since there are polluting materials that do not have a CAS number listed.



## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

4. Is there potential for substantial harm to the waters of the state if there's a release? If so, the DEQ may require the facility to comply with the Part 5 rules per Rule 3(2) if it determines there isn't adequate environmental protection at the site. This may apply if the facility has less than the applicable TMQ of polluting materials, or meets one of the conditional exemptions, or the facility does not meet the definition of on-land facility or oil storage facility.

### **IV: ANSWERS TO COMMONLY ASKED QUESTIONS ABOUT PART 5 RULES**

1. When do we have to meet these new Part 5 rule requirements?

A facility has a "grace period" until August 31, 2003 to be in compliance with the secondary containment for storing liquids outdoors and PIPP requirements even if it was subject under the rescinded rules. Requirements for all use and indoor storage areas, storage areas for solid polluting materials, surveillance, and release reporting were effective since August 31, 2001. All facilities subject to the Part 5 rules must be in compliance with all applicable requirements by August 31, 2003. New facilities or renovations after August 31, 2003 need to be in compliance with the Part 5 rules by the time they begin operations.

2. Can PIPPs be combined with other emergency plans?

Yes, Rule 6(3) allows development of an Integrated Contingency Plan (ICP), but it must contain ALL the information required by the different planning regulations and it is allowable under the other regulations. It is not mandatory to combine the different plans, but is recommended so a facility has a single point of reference if there is an emergency. See the [ICP plan guidance](#) for combining state and federal planning requirements.

Common environmental plans a facility often combines with a PIPP include:

- Federal SPCC plan if the facility has met federal oil storage conditions discussed previously. If the facility has oil, see note above under Section II, point B. If the facility has both oils and other polluting materials, the ICP can combine the SPCC plan for the oils and the PIPP information which addresses the other polluting materials if those TMQs have been met or exceeded. Go to [EPA's SPCC website](#) or contact [EPA Region 5, Oil Planning and Response Section](#) at 312-353-8200 about SPCC requirements.
- Hazardous waste contingency plan if the facility is a large quantity generator (LQG) of hazardous waste. An LQG must prepare a written contingency plan which can be combined with a PIPP. This combined plan is NOT submitted to the DEQ unless requested, but it must be submitted to other entities as required under the hazardous waste regulations. See the WHMD guidance for ["Contingency Plan and Emergency Procedures for Fully Regulated Generators."](#) Small quantity generators of hazardous waste do not have to prepare a written plan, but are required to post emergency information and have arrangements made with emergency responders. A self adhesive [emergency poster](#) and summary of those requirements is available by calling 800-662-9278 or from a WHMD district office.
- Storm water pollution prevention plan (SWPPP) if the facility is subject to the storm water discharge regulations. A sample [storm water pollution prevention plan](#) for industrial facilities is available from the [Water Division district office](#). Also see EPA's storm water publication ["Spill Prevention Planning Fact Sheet"](#) for information.

Look at existing response plans the facility may already have. Even if it is determined the facility is not subject to the Part 5 rules or other environmental planning regulations, it probably still has to have some type of emergency response or action plan under [MIOSHA regulations](#) overseen by the Michigan Department of Consumer and Industry Services (CIS). Information contained in a PIPP and other plans is not only useful to the facility, but information could be used by LEPCs developing community response plans under SARA Title III regulations and by local fire departments meeting their emergency planning requirements. See the Michigan State Police publication ["Critical Incident Protocol — A Public and Private Partnership"](#) for community and facility joint planning information.

## **Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet**

3. Is there a specific format required when preparing a PIPP or ICP, or a template or sample plan available?

DEQ has not prepared a sample PIPP, but there is a checklist available beginning on page 10. If you are combining a PIPP with other state and federal plans, there is cross reference template available in the [ICP guidance](#). You may want to review that guidance even if you are only preparing a PIPP because it provides emergency planning elements to consider. Sample PIPPs are not provided because a PIPP should be specific to the company's processes, materials, facility layout, and capabilities. The Part 5 rules are intended to help a facility prevent releases from occurring, and if an emergency occurs the facility should have the information in the PIPP to respond quickly and thoroughly. An effective plan should reduce cleanup costs if there is a release and the plan is properly developed and implemented.

4. Are we required to hire a professional engineer to prepare a PIPP?

No. The owner or operator is required to ensure a PIPP has been prepared, maintained, and the facility operated in accordance to it. A PIPP may be written by the owner, operator, manager, other employees capable of doing it, or the facility may hire an environmental consultant, engineer, or other personnel. A Professional Engineer (PE) does NOT need to certify a PIPP. However, if a PIPP is combined with a SPCC plan, federal regulations requires a Professional Engineer to certify that the SPCC plan has been prepared in accordance with good engineering practices.

When deciding who will prepare the plan, ask *“Who in-house knows enough about the facility and planning to prepare a PIPP and can they help meet the other Part 5 rule requirements, or do we need outside help?”* Whether the PIPP is developed in-house or by outside resources, review the draft PIPP and ask *“Can our employees understand it?”* and *“Is this what we will REALLY do?”* If the answer is no, then redo the PIPP. Keep the PIPP as simple as possible, yet include all the necessary information.

5. Do past pollution incidents have to be included in the PIPP?

No, but it is good to evaluate past and potential incidents at your business or at similar facilities. Consider the loading and unloading procedures, normal operating processes, monitoring and inspection practices, available spill response equipment and supplies, existing secondary containment structures, and other means to keep releases from reaching surface waters and groundwater and wastewater treatment plants. Consult all employees and develop a list of possible pollution incidents that you should consider when developing the PIPP. Discuss with plant safety personnel how techniques used in accident prevention programs may be useful in identifying potential environmental problems. Develop spill control measures to prevent recurrence of past incidents and which address the most probable types of pollution incidents that could now possibly occur.

6. Are there other Part 5 rule requirements besides preparing a PIPP?

Yes, if you're subject to preparing a PIPP, you are also subject to meeting the other applicable Part 5 rules including containment, surveillance, and release reporting.

7. Are there specific employee training requirements?

Not under the Part 5 rules, but other regulations contain training requirements include the hazardous waste regulations and the CIS Hazardous Waste Operations and Emergency Response (HAZWOPER) standard and federal SPCC regulations. It is recommended the company train employees what their role is under the PIPP and conduct practice drills. Drills can help determine if the plan works as anticipated and to reinforce training. As another reinforcement to training, the facility may want to post a summary of the plan at appropriate places in the facility (e.g. cafeteria, areas with high spill potential, meeting rooms) that lists the designated coordinators and how to contact them, location of spill response kits, evacuation routes, and phone numbers of regulatory agencies that need to be contacted in the event of a reportable spill. Small quantity generators of hazardous waste are required to post emergency information by telephones.



8. When calculating TMQs and TRQs, are the polluting materials counted the same?

No. When determining TMQs listed in Rule 2(f), count the total pounds of all the pure products and mixtures containing 1% or more of an individual polluting material that is not exempted by a definition in Rule 1 or as a conditional exemption in Rule 3. For oils and salts, it would be the total amount on the contiguous site. For the other polluting materials listed in Rule 9, it would be the total amount of all the containers in the discrete area.

Rules 2 and 9 identify the TRQ in pounds for a particular polluting material. It is not the amount of a release of a mixture containing polluting materials. It is necessary to calculate the TRQs for mixtures containing 1% or more polluting materials in the product or liquid industrial waste (see page 6). Mixtures that contain less than 1% of individual polluting materials, but if added together would be more than 1%, would NOT be included in calculations. For example, a mixture containing  $\frac{3}{4}\%$  acetone and  $\frac{3}{4}\%$  benzene for a total of 1.5% would NOT be included.

9. Are secondary containment requirements in the Part 5 rules the same as other regulations?

Not necessarily. A facility needs to determine which regulations apply to the materials on-site. If there are materials that are regulated under more than one regulation, then meet the stricter requirements. If you are unsure of the requirements or interpret a conflict between the regulations, discuss those issues with the regulating agencies.

10. What is considered “adequate surveillance” and a “timely manner” as referenced in Rule 4?

A “timely manner” is intended to mean before a release could reach the waters of the state, be it surface water or groundwater. “Adequate surveillance” would need to be some type of inspection schedule or other means to detect releases before they can reach the waters of the state. If the company is only open Monday through Friday, it does not mean there has to be inspections on weekends, but if a release occurred during that time, then the facility may not meet the time limitations identified in Rule 2 (b) which would relieve them from release reporting requirements contained in Rule 7.

11. What other resources are available to help prepare emergency plans?

Links to numerous resources are listed throughout this publication. Additional planning information is available from the [State Police, Emergency Management Division](#) or call 517-333-5042 for various resources including the [“Site Emergency Planning Workbook.”](#) It provides guidance on how to build a site emergency team, conduct a hazard analysis, perform a capability assessment, how to implement a plan, and more. Also see the federal MIOSHA guidance document on [“How to Plan for Workplace Emergencies and Evacuations.”](#) The [Office of Regulatory Reform](#) has links to Michigan rules referenced in this packet. The [DEQ Emergency Planning website](#) and [Water Division website](#) may also provide additional resources.

**Pollution Incident Prevention Plan (PIPP) and Part 5 Rules —  
Informational Packet**

**V: POLLUTION INCIDENT PREVENTION PLAN COMPLETENESS REVIEW CHECKLIST**

This checklist is provided to help identify that the minimum requirements included in administrative rule R 324.2006 are addressed in the PIPP along with a few recommended items to include. See the next section which corresponds to these rules for more information and review the Part 5 rules when developing or updating a plan. Include components that are specific to the facility's pollution prevention methods and emergency response. It is not required to provide the information in the order presented. This checklist does not include all requirements if preparing an ICP.

**SPECIFIC INFORMATION OUTLINE**

**Rule 6(1)(a) I: Facility identification information**

**IN THE PLAN?**

**Yes No N/A Identify the following information about the facility:**

- 1. Facility name
- 2. Facility owner
- 3. Mailing address
- 4. Street address (if different from mailing address)
- 5. Facility telephone number
- 6. 24-Hour emergency telephone number(s)
- 7. Designated spill prevention and control coordinator. It is recommended to also have an alternate contact.
- 8. Name of person(s) responsible for on-site spill prevention and control (if different from coordinator). It is recommended to also have an alternate contact.
- 9. Procedures that will be used to notify individuals within the facility. It is recommended you include how the following will be alerted of an emergency at the facility:
  - a. Spill prevention and control coordinator
  - b. Person(s) responsible for on-site spill prevention and control if different from coordinator, and
  - c. Other people in the facility about the emergency
- 10. Map showing facility relative to the surrounding area, include thoroughfares.

**Rule 6(1)(b) II: Notification Procedures to Entities Outside of Facility**

**IN THE PLAN?**

**Yes No N/A Identify the reporting procedures that will be used to notify entities off-site. At a minimum, include notification to the following:**

- 1. Michigan Department of Environmental Quality
  - a. PEAS Hotline 800-292-4706
  - b. District office during business hours (recommended)
- 2. U.S. Coast Guard - National Response Center 800-424-8802
- 3. Local emergency planning committee
- 4. Local fire department
- 5. Local law enforcement agency (e.g. police, sheriff's department)
- 6. Municipal wastewater treatment plant if facility served by that plant
- 7. Spill clean-up contractor, or consulting firm, or both
- 8. Other local, state, and/or federal agencies or entities that you may be required to report releases under other regulations (required if preparing an ICP that has additional reporting requirements)

**Pollution Incident Prevention Plan (PIPP) and Part 5 Rules —  
Informational Packet**

**Rule 6(1)(c) III: Spill Control and Cleanup Procedures**

**IN THE PLAN?**

- | Yes                      | No                       | N/A                      | Identify information about how the facility will control spills and conduct cleanups of releases: |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 1. Inventory and location of spill control and clean-up equipment (type and quantity)             |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | a. Equipment available on-site  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | b. Equipment available off-site   |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 2. Procedures for response and cleanup  |
| <input type="checkbox"/> | <input type="checkbox"/> |                          | 3. Procedures for characterization and disposal of recovered materials                            |

**Rule 6(1)(d) IV: Polluting Material Inventory**

**IN THE PLAN?**

- | Yes                      | No                       | N/A | Include information about polluting materials typically on-site in quantities exceeding TMQs during the preceding 12 months: |
|--------------------------|--------------------------|-----|--|
| <input type="checkbox"/> | <input type="checkbox"/> |     | 1. Polluting Material(s) by:   |
| <input type="checkbox"/> | <input type="checkbox"/> |     | a. Chemical Name(s), and   |
| <input type="checkbox"/> | <input type="checkbox"/> |     | b. Product Name (e.g. Trade Name(s)), and  |
| <input type="checkbox"/> | <input type="checkbox"/> |     | c. Chemical Abstracts Service (CAS) number   |
| <input type="checkbox"/> | <input type="checkbox"/> |     | 2. Location where the Material Safety Data Sheets (MSDS) are kept for these polluting materials                              |

**Rule 6(1)(e) V: Site Plan**

**IN THE PLAN?**

- | Yes                      | No                       | N/A                      | Include information about polluting materials typically on-site in quantities exceeding TMQs during the preceding 12 months: |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1. Aboveground and underground storage tanks   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 2. Floor drains (know where these floor drains lead to)  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 3. Loading and unloading areas, docks  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 4. Sumps (sump pumps)  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5. On-site water supply  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 6. Containment structures for solid polluting materials  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7. Secondary containment structures for liquid polluting materials   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7. Other storage and use areas of polluting materials that do not exceed TMQs (recommended)                                  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 8. Other relevant site structures  |

**Rule 6(1)(f) VI: Outdoor Secondary Containment for Liquid Polluting Materials**

**IN THE PLAN?**

- | Yes                      | No                       | N/A                      | Include information about outdoor secondary containment structures on-site used for liquid polluting materials exceeding TMQs: |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1. Location(s)   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 2. Design and construction data including:   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | a. Dimensions  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | b. Construction materials (and types of coatings) used   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | c. Holding capacity  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | d. Amount of polluting material stored in that structure   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 3. How spilled polluting materials will be captured and removed  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 4. Provisions for physical security of secondary containment structure, such as:   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | a. Signage   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | b. Gates & Fences  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | c. Barriers  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | d. Other   |

**Pollution Incident Prevention Plan (PIPP) and Part 5 Rules —  
Informational Packet**

**Rule 6(1)(f) VI: Outdoor Secondary Containment for Liquid Polluting Materials (continued)**

**IN THE PLAN?**

**Yes No N/A Include information about outdoor secondary containment structures on-site used for liquid polluting materials exceeding TMQs:**

- |                          |                          |                          |  |
|--------------------------|--------------------------|--------------------------|--|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5. Precipitation management (rain or storm water and snow accumulation) procedures                         |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | a. Characterization of collected precipitation   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | b. Disposal procedures   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | c. Copies of permits or exemptions authorizing discharge (i.e. from DEQ, local wastewater treatment plant) |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 6. Inspections and maintenance procedures  |

**Rule 6(1)(g) & (h) VII: Other Control Mechanisms and Facility Security**

**IN THE PLAN?**

**Yes No N/A Include the following information if it has not already been addressed in the plan:**

- |                          |                          |                          |   |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1. Other control mechanisms at facility to prohibit or control releases |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 2. Provisions for general facility physical security                    |

**Rule 6(2)–(5) VIII: Plan Preparation, Submittal, and Update Requirements**

**IN THE PLAN?**

**Yes No N/A Complete PIPP or ICP, review and update as necessary, and submit notifications:**

- |                          |                          |                          |   |
|--------------------------|--------------------------|--------------------------|---|
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 1. PIPP, or update, is completed by August 31, 2003   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 2. Plan is kept at the facility and available for inspection  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 3. Notification that PIPP or ICP has been prepared and certification of compliance with Part 5 rules sent to WD district office within 30 days of completing the PIPP or ICP  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 4. Notification sent to LEPC that plan is completed and available upon request  |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 5. Notification sent to local health department that the plan is completed and available upon request   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 6. Copy of plan submitted to a requesting agency within 30 days after receiving the request   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 7. Plan is evaluated every three years and after any release requiring implementation of the plan   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 8. Plan is updated if any facility personnel, processes, or procedures that were included in the plan occur, or other changes are necessary to maintain compliance with rules   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 9. Recertification and re-notification of updates are sent to WD district office, LEPC, and local health department   |
| <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | 10. Plan is modified within 30 days of receipt, or other DEQ provided response timeframe, of the DEQ's request to modify the plan if found to be incomplete or inadequate; submit re-notification and recertification |

**VI: ADDITIONAL INFORMATION TO USE WHEN PREPARING A PIPP  
AND COMPLETING THE CHECKLIST**

**Rule 6(1)(a) I: Facility identification information**

- 1. thru 6.** Include basic information about the facility location, who owns it, and contact information.
- 7. and 8.** Identify the designated spill prevention and control coordinator and who is responsible for on-site spill prevention and response, if they are different people. It is recommended alternate person(s) be designated for these responsibilities in case the primary people are unavailable. The primary contacts may be gone on vacation, out sick, or have their own personal obligations and not be available to respond to an emergency at work. Consider who will be responsible for notifying people at the facility of

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

an emergency. Responsible personnel should have the authority to contract for and obtain any necessary emergency services without delay.

9. Identify how people at the facility will be made aware of the emergency (e.g., alarms, flashing lights, public announcement system, pagers, etc.). If it is necessary to evacuate the building when an emergency occurs, it is recommended that someone be responsible for taking time cards and guest book, if the company uses them, to aid in identifying who was in the building when the emergency occurred. Note that evacuation plans may be required under MIOSHA regulations and large quantity generators must include evacuation routes under the hazardous waste regulations.
10. Include a map of the facility relative to the surrounding area, including thoroughfares. Include information critical to emergency response. It is recommended to include all roads or access routes that emergency responders could use when responding to a release or that may need to be closed to the public if a significant release occurred. Local planning agencies may already have base maps of existing features in your area. Although the following information is not specifically required by the Part 5 rules, you may want to include on the map any sites in the immediate area that could be negatively impacted by releases:
  - Community drinking water wellheads. If your community has a designated wellhead protection program, they will have the area delineated. Contact that program if you don't know if your facility is in the designated area. Outline the protected area on your map. If you don't know your local contact, contact the DEQ Drinking Water and Radiological Protection Division at 517-335-9054 for [wellhead protection program](#) information.
  - Private drinking water wells and their recharge areas located in the immediate vicinity. Contact your [local health department](#) for this type of information. Health departments are usually listed in phone books under the government section.
  - Streams, drainage ditches, lakes, wetlands and other water bodies nearby the facility. Several mapping sites of existing features are available on the Internet. For example, see the [EPA EnviroMapper](#) which includes county maps and data about EPA-regulated sites, US Census demographics, and street-level maps.
  - Local planning agencies also have this type of information available.
  - Other environmental sensitive areas including endangered or protected species. The Michigan Department of Natural Resources has some information on the Internet or call 517-373-1263. Go to [www.michigan.gov/dnr](http://www.michigan.gov/dnr) and select "Wildlife & Habitat," "Plants and Habitat at Risk" and select "Endangered and Nongame Wildlife" for summaries and lists of Michigan endangered species and links to federal endangered species sites including one for the Great Lakes.
  - Nearby public sites like schools, daycare centers, nursing homes, hospitals, museums, etc., that may need to be notified of releases that could present danger to them. The [local emergency management programs contacts](#) may have this information readily available. If you do not know your LEPC contacts, call Bonnie Fighter, Michigan State Police, Emergency Management Division, at 517-336-2042 or email her at [fighterb@michigan.gov](mailto:fighterb@michigan.gov).

### **Rule 6(1)(b) II: Notification Procedures to Entities Outside of Facility**

1. thru 8. Include the process of making people outside of the facility aware of an incident whenever there are reportable releases or you need emergency response. When developing the notification procedure, consult with your [LEPC](#) and local responders about the best way to communicate with the local authorities and what information they want reported.

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

Identify the following:

- a. Who is notified and how (e.g., phone call, fire alarms, etc.).

Rule 6(1)(b) identifies at a minimum who must be contacted. Calling the Pollution Emergency Alerting System (PEAS) at 1-800-292-4706 will satisfy the notification requirement to the DEQ as required by the Part 5 rules. The PEAS operators during normal office hours will take the information and relay it to the appropriate DEQ staff or they may provide the option of you calling the local DEQ district office that oversees the area where the reportable release occurred. You may want to identify the local district office number for the Water Division as well as the PEAS in case you need to talk to DEQ staff directly for more information.

A listing of the [Michigan State Police posts](#) by the [community and county they serve](#) is available on the Internet.

If you are preparing an ICP and are subject to other release reporting regulations, determine if there are [additional notification requirements](#) than those listed in the Part 5 rules. You will need to review the specific regulations or facility permits for details. Also check if there are any local requirements that require reporting to the wastewater treatment facility, local health department, drinking water department, hospitals, etc. If the company is subject to SARA Title III, remember you will need to notify all LEPCs that may potentially be affected by a release at the facility. Include these additional entities that require reporting information in your ICP.

- b. Timeframe to submit the initial notification and the follow-up written report.

Rule 7 requires reporting as soon as practicable after detection of a release that exceeds the TRQ during any 24 hour period. Rule 4 requires adequate surveillance at a facility so a release can be detected in a “timely manner.” Timely is intended to mean before a release could reach the waters of the state. A follow-up written report is required within 10 days of the release. Submit the written report to the DEQ WD Chief, PO Box 30241, Lansing, MI 48913. If you submitted a written release report under another DEQ requirement, such as a NPDES permit condition, and the report contains the information required in Rule 7(2) it is not necessary to submit an additional report to the WD.

If you are subject to the SPCC regulations and do not have to prepare a PIPP for any other polluting materials, remember that you must report oil releases as required in Rule 7 to the DEQ in addition to meeting the federal reporting requirements per Rule 3(1)(b). The Part 5 Rules reporting criteria are different than federal reporting criteria and need to be included in the SPCC. In addition, if you are subject to SPCC regulations and were required to report an oil release per federal requirements, you are also required to provide the state that information per 40 CFR 112.7(4)(c) within 60 days.

- c. If specific forms are required to be used for reporting releases.

Reporting releases under the Part 5 rules does not require a specific form. A [generic report form](#) is available on the Internet for Part 5 reporting purposes and for meeting other regulations that do not require specific forms. A suggestion is to make copies of the form after filling in the basic facility contact information and then finish completing the form with the applicable information after a release occurs. If you prepared an ICP, some regulations require [specific report forms](#) to be used when initially reporting a release or spill and for follow-up reports. These forms are identified on the reporting summary table referenced above.



## Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet

d. When a release would be reportable.

It is recommended the plan identify the conditions when a release is reported as described in Rules 2(b) and (g) to help employees determine when they must report a release. There are two broad steps when determining release reporting under the Part 5 rules:

**First**, determine when a spill, leak, or discharge at the site would not be considered a “release” per Rule 2(b) and would not require reporting under the Part 5 rules. Remember release reporting may still be required under other planning regulations if doing an ICP, or other regulations or permitting conditions the facility is subject to.

Example 1: a 50 gallon oil spill was cleaned up within 24 hours of the release, AND the oil did not reach the public sewer system or to waters of the state. This would not be reported as a release per Rule 2(b)(ii).

Example 2: 55 pounds of lubricating oil spilled (approximately 6 gallons) onto the ground and it was not cleaned up within 24 hours after the spill. This would require reporting per Rule 2(g).

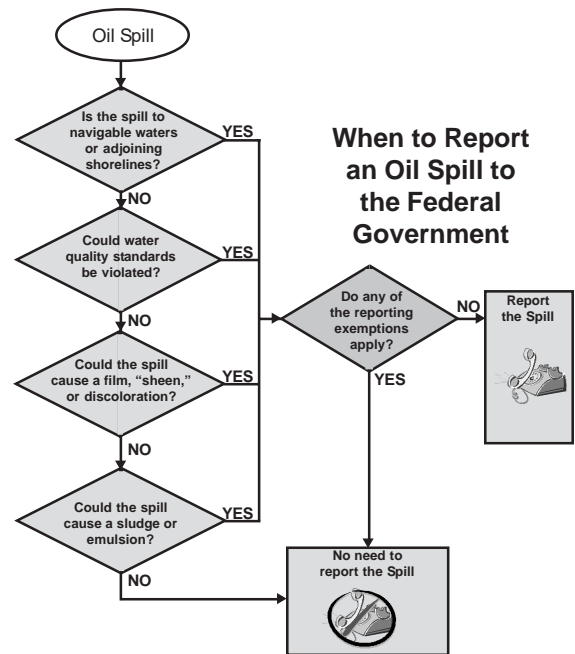
Example 3: polluting materials were discharged into a permitted waste treatment plant with prior approval by the waste treatment authority. This is not considered a release per Rule 2(b)(v). This would apply to wastewater treatment plants issued either a NPDES or Michigan groundwater discharge permit and to federally permitted release as allowed under CERCLA.

Example 4: 30 gallons of oil were released into a river and it was immediately and effectively cleaned up. This would not require reporting per Rule 2(b)(iii) if the effective recovery using containment booms, spill pads, or other means resulted in NO visible oil, film, sheen, or discoloration escaping the containment area. It would be reportable under federal regulations if it meets the flowchart conditions.

Example 5: a release of air contaminants occurred. It would not be considered a Part 5 release per Rule 2(b)(iv) if it meets the definition of air contaminant in Section 324.5501(a) [dust, fume, gas, mist, odor, smoke, vapor, or any combination thereof]. It may be reportable under the air regulations.

**Second**, determine the amount of a release of polluting materials that would require reporting:

Use your polluting materials inventory that is required by Rule 6(1)(d) and identify TRQ for the polluting materials. See Rule 2(g) for definition of TRQ. Any quantity of oil, or polluting material listed in Rule 9, that is released to waters of the state would require reporting if it caused unnatural turbidity, color, visible sheens, oil films, foams, solids, or deposits in the receiving water body per Rule 2(g). “Waters of the state” include groundwater, lakes, rivers, streams, and other watercourses and waters within the jurisdiction of the state and the Great Lakes bordering Michigan.



## **Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet**

Look up the TRQ listed in Rule 9 to identify the amount of a reportable release for those polluting materials. This TRQ is only the amount of a particular material released that is listed in Rule 9, not the full amount of mixture containing 1% or more of polluting material. This is different than the TMQ which uses the total amount of mixtures that contain 1% or more of polluting materials. Releases of fine mineral fibers do not have to be reported under the Part 5 rules.

When looking at Rule 9:

- ✓ This table of polluting materials is a combination of chemicals contained in the state's Critical Materials Register compiled by the Water Division and the federal CERCLA list. Different regulations refer to different chemical lists. Synonyms of the chemical names may be listed so it is recommended to check lists using both the CAS number in addition to the name since some materials may not have a CAS number listed.
- ✓ Remember a facility may have to meet other regulations that require release reporting in addition to the Part 5 rule requirements. Prior approved releases to the publicly owned treatment plant (POTW) would not be reportable to the DEQ, but if there is a release that exceeds the TRQ that was not approved by the wastewater treatment plant authorities, it would require reporting to both the POTW and DEQ. The facility may also have permit conditions that require releases to be reported.
- ✓ If doing an ICP and you've calculated different reporting amounts as required by the different regulations, you may want to create a table that lists when a specific volume of release has to be reported to a local, state, or federal agency. The TRQ listed in Rule 9 may have a different TRQ than what is listed in other regulations requiring release reporting. For example, xylene (mixed isomers), CAS #1330207, has a 10# TRQ under Rule 9, a 100# RQ under the current federal CERCLA, and 1000# RQ under Part 201. Reporting releases under Part 201 of Act 451 are overseen by the DEQ Remediation and Redevelopment Division. The Michigan Part 201 regulations reference the July 1, 2001 CERCLA Table 302.4 list of hazardous substances and final reportable quantities. There are also EPA reporting requirements based on the RQs listed in the current CERCLA Table 302.4. A regulated substance in underground storage tank also includes hazardous substances on the current CERCLA list. The [List of Lists](#) contains reportable quantities and threshold planning quantities for some federal regulations.

For liquid polluting materials, it would be helpful to calculate the smallest volume (e.g., tablespoons, quarts, gallons) of materials kept on-site that meets the reportable quantities. If you have a mixture of polluting materials, use these basic steps to calculate the reportable amount for each of the polluting materials. Example calculations are available at [http://www.michigan.gov/documents/deq/deq-ess-sara-releasecalcs\\_306022\\_7.pdf](http://www.michigan.gov/documents/deq/deq-ess-sara-releasecalcs_306022_7.pdf).

- ✓ Use the specific gravity or relative density from the MSDS and multiply it by the weight of water (8.33 lb/gal) to equal the weight of the mixture in pounds per gallon. If the MSDS has ranges listed, calculate the reportable amount for the low and high end of the listed ranges.
- ✓ Take the TRQ in pounds from Rule 9 and divide it by the weight of the mixture as calculated in the step above and divide it by the weight % for the individual polluting material (this should be listed on the MSDS or available in a chemical dictionary) to get the volume of the polluting materials that would require reporting if released.
- ✓ If the mixture has additional polluting material ingredients, calculate the reportable quantities for each of them.
- ✓ Results: Report releases of mixtures using the lowest calculated volume.

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

- Consider how a release may affect other regulatory requirements.

Although not part of the release reporting requirements under the Part 5 rules and not required to be in a PIPP, a facility should consider how a release may affect other regulations. This may include submitting a [Toxic Chemical Release Inventory \(TRI\) under SARA Title III, Section 313](#), filing an [Annual Wastewater Report \(AWR\)](#) under Part 31 of Act 451 of 1994, as amended, or other requirements such as permit conditions. Call 517-373-8481 for more TRI information. Call 517-373-6565 for more information about the AWR. Call the Division or agency that issued the permit regarding questions about permit requirements.

If a facility is required to submit a written release report to the DEQ under another regulation or permit condition, it is not necessary to submit another duplicative release report to the DEQ Waste Management Division as noted in Rule 7 if the first report contains all the information required by Rule 7(2). Remember, written Part 5 release reports now go to the Water Division.

### **Rule 6(1)(c) III: Spill Control and Cleanup Procedures**

The PIPP must contain information about how the facility will control releases and how it will respond and clean up if a release occurs. This includes the following three broad categories of information:

#### **1. List all spill control and response equipment.**

Include an inventory and location of spill control and cleanup equipment available on and off-site in the PIPP that would be used to respond to an incident at the facility.

Use the process of developing a PIPP to look critically at the facility to determine if it has the means to protect the environment and human health from releases. Look at all of the facility's property, including the office areas, storage buildings, process lines, loading/unloading trucking areas, and other indoor and outdoor areas. Identify what control and response equipment and material is already on-site, where it is located, whether or not it is appropriate for the types of materials on-site and the types of releases you may have, whether it has been maintained properly, and consider what else may be needed to respond to an emergency. Contact suppliers and emergency response contractors to determine the availability of any additional response supplies necessary for controlling and removing pollution hazards. Consider the following:

- Are there inventory control methods at the facility that could be used to determine if there is a release? What mechanisms are used to track material from receipt to disposal or shipment of product off-site?
- Who is responsible for product loss reporting to management?
- What would happen to the manufacturing process if there is a power failure? Are protection systems fail-safe upon loss of electrical power? Investigate the possibility of reactant materials being lost during an extended power failure and identify steps that must be taken to provide containment or safe handling of those materials.
- What potential effect is there from floods, employee strikes, and vandalism?
- Have environmental consequences of equipment breakdowns been evaluated? Investigate the availability of spare parts. Consider keeping on hand critical parts that are not readily available. A company with on-site treatment should consider having duplicate treatment units available when it is not feasible to shut down the process lines in the event of treatment equipment failure.

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

- Is the facility in compliance with other environmental and health and safety regulations? For example, are product storage tanks properly constructed, installed, and maintained? Do they have proper coatings and corrosion protection? Are special safety devices (pressure relief vents, leak detection monitoring, overfill protection, check valves, etc.) working properly? Do you have tanks properly registered, if required? Discuss tank requirements with the WHMD.

### **2. Identify the response and cleanup procedures.**

Identify in the PIPP how the facility will initially respond when a release is discovered; procedures how to assess the situation including identification of incident type, hazards involved, severity of the problem, and resources threatened; what initial measures need to be taken including discharge/release control, containment, and initial recovery activities; and how releases will be cleaned up. Also consider when would the “emergency” be considered over, and what additional things need to be done (e.g. accident investigation, plan review, response critique, written follow-up reports). Start by reviewing past spills and releases and how they were handled and information from HAZWOPER training. Were previous situations handled appropriately? Consider the following:

- What polluting materials are now on-site?
- What potential causes of spills exist (e.g. containers being ruptured by forklifts, spills from loading/unloading trucks or transfer piping disconnecting, overfilling or leaking tanks, power failures, natural disasters, etc.)?
- What spill pathways exist that could carry a release to another area (e.g. where do floor drain(s) and storm sewers lead to, where do drainage ditches flow to, where does material go from the dock area)?
- What are the best release control and cleanup procedures for the facility’s situations based upon what the facility is actually capable of doing in response to a release, and whether or not services from nearby emergency response contractors or local emergency responders are needed? Consider the following control and cleanup methods:
  - ✓ Physical cleanup of dry materials include the use of brooms, shovels, sweepers, or plows;
  - ✓ Mechanical means include vacuum cleaning systems and pumps;
  - ✓ Chemical cleanups can be achieved with the use of sorbents, gels, and foams. Sorbents are compounds that immobilize materials by surface absorption or adsorption in the sorbent bulk. Gelling agents interact with the spilled chemicals by concentrating or congealing to form a rigid or viscous material conducive to a mechanical method. Foams are mixtures of air and aqueous solutions of proteins and surfactant-based foaming agents. The primary purpose of foams is to reduce the vapor concentration above the spill surface, thereby controlling the rate of evaporation.
- Will you have a contractor respond? If a contractor is necessary, make arrangements for prompt performance of contractual services on short notice. Identify potential circumstances when the contractor would be needed at the site and what types of spills can employees handle at the facility. It is recommended that several different companies be interviewed and evaluated to determine if they can assist your company before an emergency occurs. If so, get written documentation of what emergency response arrangements they will provide. Companies servicing an area can often be found in the yellow pages under “Environmental and Ecological Services.”

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

- Will employees respond to a spill? Make sure they have adequate training and proper personal protection equipment. Call the CIS [Consultation Education and Training Division](#) at 517-322-1809 for specific requirements for personal protection equipment and HAZWOPER training requirements. They can also provide information about the MIOSHA Hazard Communication and Employee Right-to-Know regulations about hazardous chemicals in the workplace and other [health and safety standards](#).
- Is emergency control and response adequately covered in employee training programs involved with both manufacturing processes and waste handling? Training programs required under other regulations may not provide your employees with what they need to know in responding to an emergency relating to polluting materials. Determine if additional training is necessary and whether training can be conducted by knowledgeable in-house staff. If not, you may need to contract with a training provider outside of your company. Consider how the facility notifies the trainer when a new employee is hired and when an employee is transferred into a position which requires additional training. Programs should address the hazards of accidental spills, the importance of preventative measures, and procedures for notifying supervisory personnel of accidents that might result in discharges of pollutants. Training should also include the prevention of situations where the improper arrangement of valves, physical impact, cross connections, and negligence in routine inspection could cause the loss of pollutants. Consider holding mock drills of pollution incidents and emergency response activities. This will help identify if your plan is adequate and also provide employees an opportunity to practice response measures before a real emergency occurs.

### **3. Properly characterize and dispose of all recovered materials and generated wastes.**

Generators of waste must determine what kind of waste is generated from a release and cleanup activities so they can ensure the waste will be properly handled and disposed. It will be necessary to determine if it is hazardous waste regulated under Part 111 of Act 451, a liquid industrial waste regulated under Part 121, or a solid waste regulated under Part 115. This determination can be done by either knowledge of the waste, where available and appropriate, or by testing samples. Some federal hazardous waste characterization guidance is available at [www.clu-in.org](http://www.clu-in.org), [www.epa.gov/epaoswer/hazwaste/ldr/wap330.pdf](http://www.epa.gov/epaoswer/hazwaste/ldr/wap330.pdf), and [www.epa.gov/epaoswer/hotline/modules.htm](http://www.epa.gov/epaoswer/hotline/modules.htm). Direct questions about waste characterization, management, or disposal to your consultant or to the WHMD district office.

Consider how a spill cleanup could possibly affect your hazardous waste generator or liquid industrial waste generator status. For facilities that already have site identification numbers, it may be necessary to change the hazardous waste generator status to a different category because of the additional amount of cleanup wastes. If this occurs, the facility will have different regulations they must meet. If there are questions about the requirements, call your WHMD district office for information. If the site does not have a site identification number, one will need to be obtained before shipping hazardous waste, or liquid industrial waste which includes used oil being recycled. Unless it is an emergency situation, it will be necessary to submit the [EQP 5150 "Site Identification Number"](#) form to obtain a site identification number or update a previous notification to the WHMD. Call 517-335-5035 or 800-662-9278 to obtain a printed copy. The WHMD will issue Emergency Site Identification Numbers only when emergency spills require immediate clean up and transportation to protect human health and the environment. Call 517-373-2730 during normal business hours and ask for the Manifest Unit Supervisor. Contact PEAS at 800-292-4706 if an emergency identification number is needed for situations after hours.

Identify [permitted and registered transporters](#) available to transfer or evacuate oil, liquid industrial waste, or hazardous wastes away from the facility site in case of an emergency. Look in the telephone book yellow pages under the headings "Waste Reduction Disposal, and Recycling Services" or "Environmental and Ecological Services" for companies that service your area. A standby working arrangement for

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

contracted emergency services would be desirable. Shipments of liquid industrial or hazardous waste off-site will require the use of a waste manifest and subsequent record keeping requirements and [state](#) and [federal hazardous materials transportation](#).

There are other Internet resources available to find information for the above requirements including:

- [www.epa.gov/oilspill](http://www.epa.gov/oilspill) for information from US EPA about oil spill prevention, response and cleanup
- [www.epa.gov/swercepp](http://www.epa.gov/swercepp) for information about chemical accident prevention
- [response.restoration.noaa.gov/cameo/links.html](http://response.restoration.noaa.gov/cameo/links.html) for numerous links to chemical databases and fact sheets
- [es.epa.gov/vendors](http://es.epa.gov/vendors) or use Internet search engines to find different vendors of environmental equipment
- [www.tc.gc.ca/canutec/erg\\_gmu/erg2000\\_menu.htm](http://www.tc.gc.ca/canutec/erg_gmu/erg2000_menu.htm) for link to the 2000 Emergency Response Guidebook useful for first responders and getting information about responding to chemical related emergencies
- <https://www.epa.gov/iris> to link to a database of human health effects that may result from exposure to various substances found in the environment.

### **Rule 6(1)(d) IV: Polluting Material Inventory**

When determining what chemicals and volumes are on-site for the inventory purposes, note the MSDS information regarding how materials should be stored, along with their general properties such as reactivity, flammability, etc. Use this information when deciding the location of these materials on-site and how this may impact your site plan in the next section.

1. Once you have any kind of polluting material that meets or exceeds the threshold management quantities listed in Rule 2(f) during the preceding 12 months, list those polluting materials in the PIPP. Include oils and salts if their total amounts located anywhere on the site exceed TMQ, and materials listed in Rule 9 that are located in discrete areas that were either individually, or the total volume of different polluting materials located in the same area added together, exceeds either 440 pounds if the discrete area is outdoors or 2200 pounds if stored indoors. Include the polluting material's product name, chemical name, and chemical abstract service (CAS) number.

It is not required to include the small containers that meet the conditional exemption in Rule 3(1), or the amount of polluting materials, but you may want to include them in the inventory so emergency responders are aware what is all present and in what amounts. If you have some products that are only on-site occasionally but have amounts of polluting materials that exceed TMQ, list them in the inventory with a note clarifying they are not always present.

2. Include where the MSDS for these materials are located. If you have questions about MSDS retention, contact CIS Consultation, Education, and Training Division at 517-322-1809.

### **Rule 6(1)(3) V: Site Plan**

1. thru 8. Develop a facility site design plan that identifies relevant site structures and the storage and use areas where polluting materials are located. This design plan should provide details about the facility site that



## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

are not necessarily included on the facility map required by Rule 6(1)(a). Consider the design and construction of indoor and outdoor areas and how it prevents releases from reaching the sewer systems, groundwater, and surface water as required by Rule 5(3) and (4). At a minimum, identify storage tanks, floor drains, loading and unloading areas, sumps, and on-site water supplies, and any other relevant structures that would be affected by a release or could be the source of a release. It is recommended to include shut-off valves, vents, connecting piping from storage tanks to process lines, the locations of response equipment and material, and other structures or devices that may provide prevention or response measures.

Make sure solid polluting materials are not stored within 50 feet of designated [wetlands](#) or shore or bank of any lake or stream.

Also when storing solid polluting materials outdoors, the containment must be designed and constructed to remain effective during a 100 year flood. [Information about 100 year floodplains](#) and how to request an estimated 100-year flood elevation is available from the [Land & Water Management Division, Water Management Section](#) at 517-373-1170.

Sewer system means the pipes, channels, conduits, manholes, pumping stations, and appurtenances, collectively or severally, actually used or intended for use by the public for the purposes of collecting, conveying, or transporting domestic and industrial waste to a treatment facility.

### **Rule 6(1)(f) VI: Outdoor Secondary Containment For Liquid Polluting Materials**

The PIPP must include specific information about the engineering controls that have been used to meet the performance standards for outdoor containment structures for liquids as required by Rules 5(1) and (2). See Rule 2(d) for the definition of secondary containment structure. If you have questions if something is outdoors, look at the definition of “indoors” in Rule 1(c) and determine if it meets all those conditions. Also consider containment to prevent releases from escaping loading and unloading areas. See the [WD operational guidance](#) regarding railroad and truck unloading areas. Include the following in the PIPP:

1. Where the containment structure is located.

Information about isolation distances and other storage recommendations and requirements are often included on the MSDS. Check with the fire department for any local isolation distance requirements if you have flammable or combustible materials, or reactive or high risk chemicals. Numerous internet sites, such as [response.restoration.noaa.gov/cameo/links.html](http://response.restoration.noaa.gov/cameo/links.html), also provide additional chemical information that could be helpful when designing secondary containment.

2. What design, size, and construction materials were used for the amount of polluting material in that area.

The Part 5 rules allow flexibility in meeting containment requirements. Choose the best means to manage polluting material so if a release occurs, it can be contained. Make sure the construction material is compatible with the stored material and it is impervious per Rule 5(2)(a). Unsealed concrete or concrete blocks are not impervious surfaces. Minimum holding capacity is described in Rule 5(2)(b). It may be necessary to increase the size to contain collected precipitation. Generally, areas in Michigan receive an average of 3.5 inches to 4.5 inches in a 25 year, 24 hour rainfall. A record 24 hour precipitation was about 10 inches.

A consideration often overlooked is how to provide squirt protection in case containers holding liquids are punctured or ruptured. Use engineering calculations to calculate the potential distance a material can squirt, or a general rule of thumb for determining squirt distance for containers is to measure the tallest height of the containers and use that measurement as the minimum distance between the stored

## Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet

containers and the edge of the containment area. Other areas often overlooked are loading/unloading docks. There must be some provision made to prohibit any spilled material in a dock area from entering sewers, drainage systems, and surface water and groundwater.

Review the [“Guide to Understanding Secondary Containment Requirements in Michigan”](#) which summarizes other regulations requiring secondary containment. Printed copies are available by calling 800-662-9278 or from your local district office. There may be additional containment requirements if your facility is subject to the [storm water program](#) requirements and/or the [federal SPCC regulations](#).

3. Description how spilled materials will be collected and properly handled and disposed of.

If the collected materials can not be used on-site, identify how the waste will be characterized and handled as required by the waste regulations. See page 12 for waste information.

4. What security measures are being taken.

Include a description of any means to restrict access to the secondary containment area including fences, gates, and other barriers. This could also include signage stating restricted access, no smoking, etc.

5. How will collected precipitation be managed?

Rule 5(2)(c) allows collected precipitation from secondary containment structures to be discharged at the site if there has not been a release, the drainage is in compliance with other regulations, the valves are kept closed except during the removal, and the discharge is under direct supervision of qualified person. The Part 5 rules do not require the “qualified person” be a certified storm water operator, but if the facility is subject to the storm water regulations, then they would need to have a certified storm water operator. The discharge must also be in compliance with the facility’s storm water NPDES and other permit requirements. Discuss these storm water requirements with the WD Storm Water Program staff district office.

The discharge cannot be, or become, injurious, and not cause runoff to, ponding on, or flooding of adjacent property. It also cannot cause erosion or cause nuisance conditions. R 323.2210 [Rule 2210(d)] of the [Part 22 groundwater quality rules](#), overseen by the WD, allows discharges from secondary containment without a groundwater discharge permit if the storm water does not contain any leaks or spills and is inspected to ensure compliance with other discharge standards. The discharge must also meet the [Part 4 Water Quality Standards](#) rules overseen by the WD. When doing a visual inspection before discharging, consider odor, color of any discharges, turbidity, floatable matter, deposits or stains. See the EPA Storm Water Management Fact Sheet [“Visual Inspection.”](#) and discuss additional pollution prevention plan information with the WD Storm Water Program staff.

If the liquid precipitation will be hauled off-site in quantities greater than 55 gallons, then the [Part 121 Liquid Industrial Waste](#) regulations must be met, including using a [permitted and registered transporter](#) and meeting manifesting requirements, etc. If shipments are 55 gallons or less, then the Part 121 Section 324.12103(4) requirements must be met. See Chapter 2 of the [“Michigan Manufacturers’ Guide to Environmental, Safety and Health Regulations”](#) for more information.

6. How the facility will regularly inspect and maintain the secondary containment structures.

Consider designing a checklist identifying what employees should minimally look for when doing inspections or doing maintenance activities. For example, one item may be checking the valves are

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

closed at all times except when precipitation is removed as required by Rule 5(2)(c)(ii). Other items may include general observations like looking for any vegetation impacts or staining that may indicate a release occurred or structural damage or problems with the security around the area. A particular polluting material may have other specific storage requirements that should be inspected. Include schedules how often inspections and maintenance activities will be done. When establishing your inspection schedules, consider Rule 5(2)(c) requirements and the time restrictions in Rule 2(b)(i) for exemption from reporting releases into secondary containment.

### **Rule 6(1)(g) & (h) VII: Other Control Mechanisms and Facility Security**

1. Identify in the PIPP what other kinds of control measures the facility has which have not been previously addressed elsewhere in the plan. Rule 4 requires facilities to have surveillance of all manufacturing processes, treatment systems, storage areas, and other such areas containing polluting materials. “Adequate surveillance” does not require a company to conduct inspections at the facility on days they are normally closed. However, if a release did occur and was not detected in time, the facility may not qualify for any of the exemptions listed in Rule 2(b) and may have to report the release. Detection of losses in a “timely manner” is intended to mean before a release could reach waters of the state.

Control measures could include preventative maintenance and testing programs to minimize mechanical failures. If so, include a description and an inspection or testing schedule for those programs. Depending on the polluting materials on-site and how they are stored, you may want to review applicable technical standards or codes from organizations such as the American Petroleum Institute (API), National Fire Protection Association (NFPA), Steel Tank Institute (STI), National Association of Corrosion Engineers (NACE), and the International Codes Committee (ICC).

Although the Part 5 rules do not require documentation of facility inspections, it is recommended that appropriate records are kept to document and identify actions taken, people involved, and dates and times of inspections and maintenance activities. Other regulations may require inspection documentation. For example, large quantity generators must keep written records of their inspections of hazardous waste accumulation areas.

2. General facility security could involve a variety of measures that deal with potential threats from vandalism, arsonists, terrorism, bomb threats, etc. and may also be affected by what types of polluting materials are on-site. Contact the [State Police, Emergency Management Division](#) at 517-336-6198 for more information how to deal with these types of situations.
  - Identify what type of general facility physical security systems are in-place (e.g. lights, fences, gates, security guards, motion monitoring equipment, etc.).
  - Is there adequate lighting for the facility grounds?
  - What kind of surveillance is used at the site? Do you have video cameras, access or equipment alarms, and/or use security staff? Depending on the polluting materials on site, is it necessary for security spot checks of personnel and vehicles entering and leaving the facility? What is the frequency of checking that tampering hasn't occurred in areas with polluting materials? Especially look at storage areas, transfer pipelines or areas, loading and unloading areas, tanks, containment structures, and shipping containers.

## **Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet**

- Are there various methods of getting security messages to employees such as newsletters, bulletin boards, or other types of communication within the physical plant and company vehicles (cell phones, satellite tracking, radios, etc.)? Is the system capable of reaching all key personnel?
- Has the adequacy of locks and other protective measures been checked? Are you familiar with vendors that service your facility?
- What kind of precautions have you taken with computer systems? Could computer hackers access critical information from outside the facility? You may want to keep that type of information on disks instead of on the computer's hard drive.
- Are there procedures to report suspicious activities?

### **Rule 6(2)-(5) VIII: Plan Preparation, Submittal, and Update Requirements**

- 1. & 2.** PIPPs and ICPs are required to be kept at the facility and available for inspection. DO NOT SUBMIT A COPY OF THE PLAN TO THE DEQ, MICHIGAN STATE POLICE, OR EPA UNLESS REQUESTED. If an ICP was prepared, submit copies of the plan as required by the other planning regulations. Plans are not submitted to DEQ as noted in the Michigan Department of Agriculture's Regulation No 641 Commercial Fertilizer Bulk Storage and Regulation No. 640 Commercial Pesticide Bulk Storage.

All facilities subject to the Part 5 rules must have plans prepared by August 31, 2003 or when they have polluting materials that meet or exceed TMQs after that date.

- 3.** Within 30 days of completing or updating the PIPP, or an ICP, submit a written notification of completion or update of the plan, and a certification the facility is in compliance with the Part 5 rules to the [Water Division district office](#) which oversees the county where the facility is located. Whoever signs the certification needs to have authority on behalf of the facility to certify compliance. The department does not require a specific form to be used to meet this requirement. Following is sample certification language that may be used, but is not required to be used:

“Under penalty of law, this certifies that (company name) at (site address) is in full compliance with the Part 5 administrative rules pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451). A copy of the Pollution Incident Prevention Plan (PIPP) [or Integrated Contingency Plan (ICP) if prepared] may be requested by [include who and how to contact to request a copy].”  
Include a signature, title, date, and mailing address if different than the site address.

- 4. & 5.** Within 30 days of completing the PIPP, or an ICP, notify both of the following that you prepared a plan:
- [Local Emergency Planning Committee](#)
  - [Local health department](#)

One recommendation is to submit a letter explaining you are notifying them as required by the Part 5 administrative rules pursuant to Part 31, Water Resources Protection, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451) that your company has completed a PIPP or ICP. Although not required by the rules, check if the local agency would like a copy of the polluting material inventory that is included in the plan submitted with their notification. Due to security issues some facilities may not want to include the list. You may notify these entities by calling them, but keep written documentation when you called and who you spoke to. If the local entities know what

## ***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet***

material is on-site, it may help them decide if they will request a copy of your plan. Make sure to provide your company's name, site address (and mailing address if different), and who to contact to request a copy of the plan.

Discuss with your local responders if they use any system in your community where facilities place response information in a location on-site so that the fire department or other first responders can easily access it if called to the site when no one is there. The spill prevention and control coordinator may also want to keep a copy or summary of the plan available in their vehicle's glove box or somewhere outside of the facility so they have access to it in case there is a situation when they can't get to a plan kept on-site. However, consider any security concerns if you do this.

6. Provide a copy of the PIPP, or ICP, within 30 days after receiving a request from the DEQ, LEPC, or local health department. You may be required to submit a copy if requested by an agency or an ICP may be required to be sent to entities under other regulations. For example, an ICP containing hazardous waste contingency planning must be submitted to local entities.
7. & 9. The PIPP, or ICP, must be evaluated every three years or after any release that required implementation of the plan, whichever is more frequent. If no changes are necessary, it is suggested that a record be kept of who evaluated the plan and review date. It will be necessary to resubmit a notification and certification of Part 5 rule compliance to the DEQ, local emergency planning committee, and local health department of any updates (see items 3, 4, and 5 above).
8. & 9. The PIPP, or ICP, must be updated when there are changes to facility personnel, processes, or procedures identified in the plan, or whenever a change is necessary to maintain compliance with the Part 5 rules. This would include changes to the polluting materials inventory that is part of the PIPP. It will be necessary to submit a re-notification and recertification of Part 5 rule compliance to the DEQ, local emergency planning committee, and local health department of updates (see items 3, 4, and 5 above).
10. If the DEQ determines the PIPP, or ICP, is incomplete or inadequate, then the facility must modify the plan and resubmit the notifications and certifications as noted above within 30 days after receipt of the department's request, unless a longer response time is authorized by the DEQ.

### **Rule 7 IX: Pollution Incident Report (this section is not included on the checklist)**

Facilities with reportable releases under the Part 5 rules must notify the DEQ as soon as practicable after detection of the release by calling the PEAS [see above summary for Rule 6(1)(b)]. Oil storage facilities subject to SPCC regulations must also report releases of oil per Rule 3(1)(b).

A written report must be submitted to the DEQ WD Chief, PO Box 30273, Lansing, MI 48909-7773 within ten days after the release. You may use the form [EQP 3465 "Spill or Release Report"](#) available on the Internet, or you can submit a written report containing the information in Rule 7(2). If you are required to submit a written release report to another DEQ Division (for example a permit may require reporting of releases) and are subject to the Part 5 rule reporting requirements, if the other required report contains the information listed below, it is not necessary to also submit a report to the WD.

In addition, you must meet other regulations requiring reporting. See section under Rule 6(1)(b) for more information.

## Pollution Incident Prevention Plan (PIPP) and Part 5 Rules — Informational Packet

If a release occurs and is reportable, the company needs to meet the following:

- 1. Releases exceeding threshold reporting quantities are called into PEAS
- 2. Written report is submitted to WD Chief within 10 days after release. Include
  - a. Cause of release
  - b. Discovery of release
  - c. Response measures taken or schedule for completion of measures to be taken, or both
  - d. Measures taken to prevent recurrence of similar releases
- 3. Releases were reported as required under other regulations

If you have questions about the Part 5 rule requirements or preparing the plan, call the [contacts listed on the website](#). If you have questions about an Integrated Contingency Plan (ICP), contact the agency overseeing the particular regulation you are combining into one plan.

### VII. WEBSITES USED IN PUBLICATION

The following table lists web addresses for encoded links and is provided for those reading printed copies of this publication instead of on-line. Internet sites are subject to change. You may also want to use a search engine on the Internet to find more or updated resources.

RESOURCE LINK	PAGE	WEB ADDRESS
Additional notification requirements	14	www.michigan.gov/deq Click on Assistance & Support Services; Environmental Reporting; Spill/Release Reporting
Annual Wastewater Report (AWR)	17	www.michigan.gov/deq Click on Assistance & Support Services; Environmental Reporting; Annual Wastewater Reporting
Consultation Education and Training Division	19	www.michigan.gov/cis Click on Workplace Safety & Health; Consultation, Education & Training
Contingency Plan and Emergency Procedures for Fully Regulated Generators	7	www.michigan.gov/deq Click on Waste; Hazardous Waste; Hazardous Waste Management; Spill Protection and Reporting
Critical Incident Protocol – A Public and Private Partnership	7	www.michigan.gov/msp Click on Publications, Forms & Statistics; Publications; Miscellaneous Publications; Emergency Management Publications
DEQ Emergency Planning website	9	www.michigan.gov/deq Click on Assistance & Support Services; Environmental Reporting; Emergency Planning
Emergency Poster	7	www.michigan.gov/deq Click on Assistance & Support Services; Environmental Reporting; Emergency Planning; Hazardous Waste Emergency Poster and Guidance



***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules —  
Informational Packet***

EPA EnviroMapper	13	<a href="http://www.epa.gov/enviro/html/em/index.html">www.epa.gov/enviro/html/em/index.html</a>
EPA Region 5, Oil Planning and Response Section	7	<a href="http://www.epa.gov/region5oil">www.epa.gov/region5oil</a>
EPA's SPCC website	7	<a href="http://www.epa.gov/oilspill">www.epa.gov/oilspill</a>
EQP 3465 "Spill or Release Report" or Generic report form	25 and 14	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Spill/Release Reporting; Release Reporting Forms
EQP 5150 "Site Identification Form"	19	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Waste; Hazardous Waste; Hazardous Waste Management; under Forms heading Hazardous Waste Program Forms and Permit Applications, select Michigan Site Identification Form
Federal SPCC regulations	22	See EPA's SPCC website
Flammable and combustible liquids	3	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Land; Storage Tanks Rules are under both Aboveground Storage Tanks and Underground Storage Tanks
Floodplains	21	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Water Management; Floodplain Management
Hazardous waste	4	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Waste; Hazardous Waste; Hazardous Waste Management
Health and safety standards and MIOSHA Standards	19 and 7	<a href="http://www.michigan.gov/cis">www.michigan.gov/cis</a> Click on Workplace Safety & Health; Standards & Legislation
How to Plan for Workplace Emergencies and Evacuations	9	<a href="http://www.osha.gov/Publications/osha3088.pdf">www.osha.gov/Publications/osha3088.pdf</a>
ICP plan guidance	7	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Emergency Planning; select Integrated Contingency Plan Guidance
Land & Water Management Division, Water Management Section floodplain contacts	21	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Water Management; Floodplain Management; Floodplain Contacts
Liquid industrial waste	4	See Part 121 Liquid Industrial Waste
List of Lists	4 and 16	<a href="http://130.11.53.73/lo/">http://130.11.53.73/lo/</a>
Local emergency planning committee or LEPC or local emergency management program contacts	2, 13, and 18	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Emergency Planning; under Related Links select LEPC Web Links then Local Emergency Planning Committee (pdf) in Related Content column
Local health department	2, 13, and 18	<a href="http://www.michigan.gov/mdhhs/0,5885,7-339--96747--,00.html">www.michigan.gov/mdhhs/0,5885,7-339--96747--,00.html</a>

**Pollution Incident Prevention Plan (PIPP) and Part 5 Rules —  
Informational Packet**

Michigan Manufacturers' Guide to Environmental, Safety, and Health Regulations	22	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Manufacturers' Guide under Quick Links
Michigan State Police posts and communities they serve	14	<a href="http://www.michigan.gov/msp">www.michigan.gov/msp</a> Click on MSP Districts & Posts Click on Publications, Forms & Statistics; Publications; Miscellaneous Publications; Michigan Municipalities and Place Names 2002
MIOSHA regulations		See Health and safety standards (MIOSHA)
Office of Regulatory Reform	9	<a href="http://www.michigan.gov/orr">www.michigan.gov/orr</a>
Oil and natural gas	4	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Land; Fuels & Minerals; Oil & Gas
Part 4 Water Quality Standards	22	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Surface Water; NPDES Permits; under Information click on Water Quality Parameters
Part 5 Spillage of Oil and Polluting Materials administrative rules	1	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Emergency Planning; under Information click on Pollution Incident Prevention Plan (PIPP)
Part 22 groundwater quality rules	22	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Waste; Groundwater Discharge; under Groundwater Statutes & Rules click on Part 22 Rules, Groundwater Quality (of Part 31)
Part 121 Liquid Industrial Waste	4 and 22	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Waste; Hazardous Waste; Hazardous Waste Management; Statutes and Rules
Permitted and registered transporters	22	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Waste; Hazardous & Liquid Industrial Waste Transportation; under Information click on Participating Transporters
Petroleum and hazardous substances	4	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Land; Storage Tanks; Underground Storage Tanks
Polluting Materials list	6	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Emergency Planning; under Information click on Pollution Incident Prevention Plan (PIPP) then Part 5 Rules
Site Emergency Planning Workbook	9	<a href="http://www.michigan.gov/msp">www.michigan.gov/msp</a> Click on Publications, Forms & Statistics; Publications; Miscellaneous Publications; Emergency Management Publications; under Planning click on Site Emergency Planning Workbook
SPCC regulations		See EPA's SPCC website

***Pollution Incident Prevention Plan (PIPP) and Part 5 Rules —  
Informational Packet***

Specific report forms for reporting spills or releases	14	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Spill/Release Reporting
State and federal hazardous material transportation requirements	20	State: <a href="http://www.michigan.gov/msp">www.michigan.gov/msp</a> Click on Services to Governmental Agencies; Motor Carrier Division; Hazardous Materials Federal: <a href="http://hazmat.dot.gov/">http://hazmat.dot.gov/</a>
State Police, Emergency Management Division	9 and 23	<a href="http://www.michigan.gov/msp">www.michigan.gov/msp</a> Click on Services to Governmental Agencies; Emergency Management Division
Storm Water Management Spill Prevention Planning Fact Sheet	7	<a href="http://www.epa.gov/npdes/pubs/spillprv.pdf">www.epa.gov/npdes/pubs/spillprv.pdf</a>
Storm Water Management Fact Sheet regarding Visual Inspection	22	<a href="http://www.epa.gov/npdes/pubs/visnspct.pdf">www.epa.gov/npdes/pubs/visnspct.pdf</a>
Storm water program	22	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a>
Storm water pollution prevention plan information	7	Click on Water; Surface Water; Storm Water
Toxic Chemical Release Inventory (TRI) under SARA Title III, Section 313	11	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; SARA Title III-Toxic Chemical Release Inventory
Water Division District staff for storm water program	7	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Surface Water; Storm Water; under Information click on Contact Information
Water Division District staff for Part 5 rules	26	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Assistance & Support Services; Environmental Reporting; Emergency Planning; under Information click on Pollution Incident Prevention Plan (PIPP); PIPP staff contacts
Water Division website	9	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water
WD operational guidance regarding railroad and truck unloading areas	2 and 21	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Emergency Response
Wellhead protection program	13	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Drinking Water; Water Wellhead Protection
Wetlands	21	<a href="http://www.michigan.gov/deq">www.michigan.gov/deq</a> Click on Water; Wetlands Protection

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