

DRAFT
ATTACHMENT C
DRAFT February 12, 2009

**CATCH BASIN MONITORING
WORK PLAN
for
4180 Luna Pier Road,
Luna Pier, Michigan**

PURPOSE

1. To monitor two catch basins in the right-of-way of Luna Pier Road, as shown on Figure 1, for the presence of any regulated substance in use on the Property that is in a liquid phase and is not dissolved in water.
2. To prevent the discharge to the surface waters of the state, including the storm sewer into which the two catch basins discharge, of any regulated substance in use on the Property that is in a liquid phase and is not dissolved in water.

DEFINITIONS

“Free product” means a regulated substance in a liquid phase equal to or greater than 1/8 inch of measurable thickness, that is not dissolved in water, and that has been released into the environment.

“Monitoring staff” means persons employed or contracted by Sphinx Luna Pier LLC and who are responsible for and trained to implement this work plan.

“Petroleum sheen” means any regulated substance in use on the Property that is in a liquid phase, is not dissolved in water, is less than 1/8 inch of measurable thickness and is visible on water.

“Property” means the retail fuel station at 4180 Luna Pier Road, Luna Pier, Michigan

“Qualified Consultant” means a qualified consultant as the term is defined in Part 215 Refined Petroleum Fund (formerly Michigan Underground Storage Tank Financial Assurance [MUSTFA]), of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

“Rain event” means rainfall equal to or greater than 1/4 inch within a 24-hour period.

“Rainfall” means rain measured at the Property or at the Toledo, Ohio airport or other weather station approved by the Michigan Department of Environmental Quality.

METHODOLOGY

1. Monitoring staff responsible for catch basin monitoring shall be trained by a qualified consultant regarding:
 - a. the location of the two catch basins shown on Figure 1, E and W

- b. safety procedures to be followed during monitoring as required by all applicable state and federal laws
- c. access to catch basins E and W
- d. recognition of a petroleum sheen and/or free product in catch basins E and W
- e. recording of information observed during monitoring

Catch Basin Monitoring Work Plan – 4180 Luna Pier Road, Luna Pier, Michigan

2. The names and current contact information for the following persons shall be kept with the log to be maintained to record catch basin monitoring activity:
 - a. each trained monitoring staff person
 - b. a representative of Sphinx Luna Pier LLC
 - c. the Property operator
 - d. a qualified consultant
3. The monitoring log shall be kept at the Property and shall be available for inspection by staff of the Michigan Department of Environmental Quality immediately upon request.
4. Catch basins E and W shall be monitored by monitoring staff for petroleum sheen and free product at a minimum of once per week.
5. Within six to twelve hours after each rain event, catch basins E and W shall be monitored by monitoring staff for petroleum sheen and free product.
6. If any petroleum sheen or free product is detected in catch basins E or W during monitoring, a qualified consultant shall be promptly summoned to the Property to:
 - a. install inflatable plugs in the outlet(s) to the storm sewer from the affected catch basin(s) to prevent or halt any discharge of petroleum sheen or free product to the storm sewer;
 - b. identify the source of the petroleum sheen or free product;
 - c. implement any response activities necessary to prevent or halt discharge of petroleum sheen or free product to the storm sewer.
7. During each monitoring event the monitoring staff shall record the following information on a form created for the purpose:
 - a. date
 - b. time
 - c. rain fall within the previous twenty-four hours
 - d. presence of free product or petroleum sheen in catch basin E
 - e. presence of free product or petroleum sheen in catch basin W
 - f. monitoring staff initials
 - g. measures taken and any relevant comments

SCHEDULE

Monitoring of the catch basins shall begin within thirty days of the effective date of the Administrative Order by Consent between the State of Michigan and Sphinx Luna Pier LLC and shall continue until MDEQ determines that all free product at the Property has been removed.

The monitoring frequency may be modified with written approval from the MDEQ.

The logs used for recording monitoring activity shall be submitted quarterly to the Jackson District Office, Remediation and Redevelopment Division, Michigan Department of Environmental Quality.

Figure 1
4180 Luna Pier Road
Luna Pier, Michigan

