

---

# *Developing the Storm Water Pollution Prevention Plan*

Keith Noble  
DEQ, Water Resources Division  
[noblek@michigan.gov](mailto:noblek@michigan.gov) | 989-385-4242

---

## **Industrial Certified Operator Training**

- Intro
- Regulatory Background
- Storm Water Permits
- Certified Storm Water Operator
- Storm Water Pollution Prevention Plan
  - Source Identification
  - Non-Structural Controls
  - Structural Controls
- Permittee Responsibilities
- Summary

## **Storm Water Pollution Prevention Plan (SWPPP)**

### **SWPPP Requirements**

- Goal - Prevent the contamination of the water
- Three main components
  - Source identification
  - Non-Structural controls
  - Structural controls

### **Source Identification**

- Site Map - must show everything relevant to storm water
- Identification of Significant Materials
  - Significant Material Inventory
  - Evaluation of the Reasonable Potential for Contribution of Significant Materials to Storm Water
- Identification of Discharge Points
- Listing of Significant Spill and Leaks
- Storm Water Sampling Data
- Illicit Connection Investigation

### **8 Non Structural Controls**

1. Preventative Maintenance / Routine Inspections
2. Good Housekeeping
3. Comprehensive Inspections
4. Material Handling Procedures and Storage Requirements
5. Sedimentation & Erosion Control
6. Employee Training
7. TMDL requirements
8. Significant Materials Present

### 1. Preventative Maintenance

- Equipment
- Tasks involved
- Frequency for conducting tasks

### 2. Good Housekeeping Practices

- Operation and maintenance procedures
- Material storage and inventory procedures
- Employee Participation
- Routine Inspections
  - Responsibility of the Certified Operator to ensure they are conducted in accordance with the SWPPP
  - Recommended every two weeks
  - Frequency should be based on activities at the facility
  - May be seasonally adjusted according to activity
  - Preventative Maintenance and Good housekeeping inspection may be combined.
- Focus on areas that have a greater potential to contaminate storm water

### 3. Comprehensive Site Inspections

- Conducting Routine and Comprehensive Inspections
  - Are not visual assessments
- Comprehensive forms must be completed by the Certified Operator
- Visual Assessment Procedures
  - An assessment of the runoff that is discharged from the facility
  - Must be developed and incorporated into the SWPPP within 6 months of issuance or reissuance

### 4. Material Handling Procedures and Storage Requirements

- Loading and unloading procedures
- Spill prevention & response
- Detailed Clean-up Procedures
  - Spill kit locations
  - Clean-up equipment
  - Clean-up personal
  - Phone numbers
- Contacts
  - Include names and phone numbers of
    - Internal Contacts
    - Agency Contacts
    - Local Emergency Contacts
- DEQ Pollution Emergency Alert System (PEAS)
  - Non-business hours
    - 1-800-292-4706
- During business hours
  - Call the District Office
  - Make sure a message is left with a person

## 5. Soil Erosion and Sedimentation Control

- Common areas prone to erosion
  - Discharge points to ditches and waterbodies
  - Culverts and Stream Crossings
- Areas of Exposed soils
- Gravel and dirt lots
- Dust Suppression

## 6. Employee Training

- Key components of Employee Training
  - Preventative maintenance and good housekeeping
  - Spill prevention and response
  - Internal Spill Reporting Procedures
- Training schedule (must be conducted at least once per year) list the month it will be conducted
- Documented
  - Who attended
  - Subject material
- Employee Training Videos

## 7. Total Maximum Daily Loads (TMDLs)

- Water Quality Standards
  - State rules established to protect the surface waters
  - Rules establish goals in THREE areas:
    1. Uses of the lakes and streams
    2. Safe levels to protect the uses
    3. Procedures to protect high quality waters

## 8. Significant Materials Still Present After Non-Structural Control

- Structural controls will have to be installed

## Sector Specific Requirements

- Auto Salvage, Scrap and Waste Recycling
  - Material Handling procedures
    - Measures to be taken to drain fluids from vehicles that are to be dismantled (as soon as possible)
    - Instructions for use of an impervious surface where spilled fluids resulting from dismantling or draining activities will be contained or equivalent means to prevent spills and leaks if vehicular fluids will not be drained
    - Handling of any spills or leaks that do occur (e.g. from equipment or during vehicle processing)
    - Use of a mercury spill kit to handle mercury releases
  - Employee Training – must also include
    - Instructions on the material handling procedures
    - (5093) Instructions on procedures for inspecting inbound materials in order to minimize the potential for significant materials to contaminate storm water

- Structural Controls
  - Include a description of controls for pollution prevention or treatment:
    - ✓ Location
    - ✓ Function
    - ✓ Design criteria
    - ✓ Installation or Construction schedule
- Structural Controls from the following storage areas:
  - Oily parts
  - Engine blocks
  - Scrap materials
  - Waste Materials
  - Lead-acid batteries
  - Liquids
- Structural Controls from processing areas where vehicles are dismantled or crushed
- Inspection Requirements
  - (5015) Inspection of newly arrived salvage vehicles
  - (5093) Inbound Materials
  - Routine Inspections conducted every 2 weeks
  - Preventative Maintenance
  - Good Housekeeping
  - Include
    - Equipment used on site
    - Liquid Storage areas
    - Oily parts
    - All structural controls
- Inspections by Water Resources Division
- Industrial Storm Water Inspection Video