

Introduction to Benchmark Monitoring

Guidance

In an effort to align with U.S. Environmental Protection Agency (U.S. EPA) storm water regulations, the Michigan Department of Environmental Quality (MDEQ) Water Resources Division began implementing Benchmark Monitoring requirements in the 2016 storm water permits associated with special use areas. The purpose of Benchmark Monitoring is to provide data to help characterize the quality of the storm water being discharged from facilities within selected industrial sectors which include sectors classified under Standard Industrial Classification (SIC) codes 5015 (Motor Vehicle Parts, Used) and SIC code 5093 (Scrap and Waste Material). Data obtained during the course of the Benchmark Monitoring Study are then compared with benchmark concentrations as a means of evaluating the storm water management controls at the facility.

The Benchmark Monitoring requirements in storm water permits associated with special use areas include options the permittee needs to consider. All of the options require a written submittal **within six months** of issuance or reissuance of permit coverage. The permittee needs to select one of the options described below:

Option 1

Submit the Benchmark Monitoring Study Plan (study plan) within six months of issuance or reissuance of permit coverage.

- ✓ The study plan may be reviewed after it is submitted to the MDEQ. If the permittee is notified of deficiencies they need to be addressed within **30 days** of notification and the study plan resubmitted.
- ✓ If the MDEQ does not take action to comment on the study plan within **90 days** of submittal, the permittee shall begin the monitoring in accordance with the study plan that was submitted.
- ✓ Implement the study plan within **90 days** of submittal or upon correcting the deficiencies. Monitoring would begin when the next visual assessment is conducted.

Option 2

The permittee elects to implement additional structural controls before monitoring. The permittee submits a written request for an alternative schedule along with the study plan within six months of issuance or reissuance of permit coverage.

- ✓ Upon receipt from the MDEQ of written approval for an alternative schedule for the study plan the permittee shall implement the approved alternative schedule.
- ✓ In no case shall an alternative schedule include benchmark monitoring commencing later than **three years** after issuance or reissuance of permit coverage.

Option 3

Submit a request to forgo monitoring.

- ✓ The permittee submits a written and signed request *within six months* of issuance/reissuance certifying that the permittee has met the following criteria:
 - Revised the SWPPP to include the additional sector-specific controls included in the permit.
 - The facility has implemented and is in compliance with conditions set forth in this permit.
 - Conducted an acceptable storm water visual assessment program and the results indicate the effectiveness of the nonstructural and structural controls.
 - Committed to not receiving or engaging in practices that generate metal particulates. Such practices include but are not limited to shredding, cutting, grinding, and/or smelting. Metal particulates include but are not limited to turnings, grinding sludges, and/or swarf.
- ✓ If the MDEQ does not take action to approve or comment on the request to forego monitoring *within 90 days* of submittal, the permittee may forego benchmark monitoring.
- ✓ Approval to forego monitoring may be delayed until there have been at least three quarters of visual assessments evaluated.
- ✓ The MDEQ may at any time deny approval to forego benchmark monitoring if it determines the facility is not meeting the criteria for such approval.
- ✓ If the request to forego monitoring is denied, the permittee must submit an alternative schedule and/or study plan *within 90 days* of receiving the notice of denial.

For facilities selecting Option 1 or 2, a template titled “Benchmark Monitoring Plan and Visual Assessment Procedures” has been created to assist with developing a study plan to ensure permit requirements are met. Prior to the development of the study plan, it is advisable that permittees also review the Visual Assessment compliance assistance documents. These compliance tools can be found on the [Industrial Storm Water Web page](http://www.mi.gov/deqstormwater) at www.mi.gov/deqstormwater (click on “Industrial Storm Water”).

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