

MiWaters Submittal Guidance - Benchmark Monitoring Compliance Report
State of Michigan Industrial Storm Water Program



Water Resources Division
DEQ Environmental Assistance Center 800-662-9278

www.michigan.gov/deq

The Benchmark Monitoring requirements in storm water permits that are 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 via MiWaters. The Benchmark Monitoring Compliance Report (Report) under the facility's MiWaters site will include the options listed below. The permittee will be required to select an option and upload the associated supporting documentation described with each option. Submitting the Report within the required time frame fulfills the written submittal requirements of the storm water permit. The options to consider are explained in detail below:

OPTION 1 – The permittee elects to submit the Benchmark Monitoring Study Plan (study plan) within six months of issuance or reissuance of permit coverage.

✓ **The supporting documentation shall include:**

- A study plan that meets the conditions of the general permit.
 - A Storm Water Pollution Prevention Plan (SWPPP) that meets the conditions of the general permit including the additional sector-specific controls. *See below for sector specific controls.*
- ✓ The study plan may be reviewed after it is submitted to the Michigan Department of Environmental Quality (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 and/or site modifications before monitoring. The permittee shall submit a written request for an alternative schedule within six months of issuance or reissuance of permit coverage.

✓ **The supporting documentation shall include:**

- A written request that describes the additional structural controls to be installed and any other modifications planned for the site. The written request shall include a timeline of when the controls will be functional and when the final study plan and SWPPP will be submitted.
- ✓ 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 – The permittee elects to submit a request to forgo benchmark monitoring within six months of issuance or reissuance of permit coverage. By selecting this option and submitting the Report via MiWaters the permittee is certifying that the facility does not/will not accept metal particulates nor engage in practices that generate metal particulates unless the facility's operations and/or physical layout are designed and implemented to prevent contact between scrap metal and precipitation, including runoff, and/or eliminate discharges of storm water associated with areas of metal particulate storage or generation. 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.

✓ **The supporting documentation shall include:**

- A SWPPP that meets the conditions of the general permit including the additional sector-specific controls. *See below for sector specific controls.*
 - 3 most recent quarterly visual assessment reports which includes color photos.
- ✓ If the MDEQ does not take action to approve or comment on the request to forego benchmark monitoring within **90 days** of submittal, the permittee may forego benchmark monitoring.
- ✓ Approval to forego benchmark 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.

Additional SWPPP controls for Auto Salvage (SIC Code 5015) & Scrap and Waste Recycling (SIC Code 5093) Facilities

Material Handling Procedures

Material handling procedures shall address the following:

- 1) the collection, storage, recycling, and disposal of oil, solvents, antifreeze, mercury switches, lead-acid batteries, and other vehicular fluids;
- 2) the measures to be taken to (as soon as practicable) drain fluids from vehicles that are to be dismantled;
- 3) instructions for the 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;
- 4) the handling of any spills or leaks that do occur (e.g., from equipment or during vehicle processing); and
- 5) the use of a mercury spill kit to handle mercury releases.

Employee Training Program

The employee training program shall include instruction on the material handling procedures specified in the material handling procedures above.

(5093 only) Instruction on procedures for inspecting inbound materials in order to minimize the potential for significant materials to contaminate storm water.

Structural Controls

The SWPPP shall provide a description of the location, function, design criteria, and installation/construction schedule of structural controls for storm water pollution prevention and treatment within the following areas, as applicable:

- 1) storage areas/bins/containers where oily parts, engine blocks, scrap material, waste material, lead-acid batteries, or liquids are stored;
- 2) processing areas where vehicles are dismantled and crushed;
- 3) storm water discharge points – to control the release of sediment and/or petroleum products;
- 4) access roads (i.e. entrances and exits) – to reduce/prevent track-out of significant materials;
- 5) equipment and vehicle wash areas intended to reduce/prevent unauthorized discharges; and
- 6) (5093 only) outdoor areas where significant materials are stored.

Inspection Requirements

The SWPPP shall describe the procedures for carrying out required inspections as specified below:

Material handling procedures address:

- 1) (5015 only) Newly arrived salvage vehicles shall be inspected for leaks as soon as practicable after their arrival. (5093 only) Inbound materials shall be inspected to minimize the potential for significant materials to contaminate storm water.
- 2) Routine preventative maintenance and good housekeeping inspections shall be conducted once every two weeks. At a minimum, these inspections shall include:
 - a) equipment used on site;
 - b) storage areas containing oily parts, hydraulic fluids, other fluids (e.g.: fuels, oils antifreeze, brake fluids, and solvents), lead-acid batteries, hazardous materials and/or mercury switches; and
 - c) all structural controls specified in the SWPPP.

For information or assistance on this publication, please contact the (name of division/office, program), through the DEQ Environmental Assistance Center at 800-662-9278. This publication is available in alternative formats upon request.

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