



## Short-Term Storm Water Characterization Study Plan Checklist

*Industrial Storm Water Program*

Water Resources Division

Environmental Assistance Center 800-662-9278

[Michigan.gov/EGLE](https://Michigan.gov/EGLE)

This checklist can be used by permittees to ensure their Short-Term Storm Water Characterization Study (STSWCS) plan (collectively “study plan”) meets the study plan requirements of the storm water permit that authorizes discharges associated with special-use areas. The purpose of the STSWCS is to determine the quality of the storm water being discharged from special use areas to surface waters of the state. Special-use areas are defined as secondary containment structures required by state or federal law; areas regulated under Part 201, Environmental Remediation, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA); and/or areas of concern identified by Water Resources Division (WRD). This document and other related compliance assistance materials can be found at the [WRD Industrial Storm Water webpage](#).

Within six months of the effective date of a Certificate of Coverage (COC) or a National Pollutant Discharge Elimination System (NPDES) Individual Permit, the permittee shall submit to the WRD an approvable study plan. The permittee’s Storm Water Pollution Prevention Plan should be submitted along with the study plan. Upon approval of the study plan, the permittee shall begin monitoring the authorized discharge as specified in the study plan. If the WRD does not take action to approve or comment on the study plan within ninety days after its submittal, the permittee shall begin storm water monitoring in accordance with the study plan submitted. All permit related documents are required to be submitted to WRD via the permittee’s [MiWaters site](#).

The items listed in each section below should be included in the study plan to ensure it can be considered administratively complete.

### Section 1: General Information

- ✓ Facility name and address
- ✓ COC Number or NPDES Individual Permit Number
- ✓ Receiving Waters
- ✓ COC or NPDES Individual Permit issuance or reissuance date
- ✓ Date the study plan was submitted to WRD for review
- ✓ The approximate calendar year quarter the STSWCS is expected to be completed (e.g. 2022 1st Quarter)

Yes, the study plan includes all items in this section.

## Section 2: Contact Information

- ✓ Name
- ✓ Title
- ✓ Phone number
- ✓ Email address

Yes, the study plan includes all items in this section.

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## Section 3: Description of Special-Use Area(s)

- ✓ Identification of special-use area(s) the study plan is being developed for and the required attachments for each special-use area described below:
  - Secondary Containment Structure(s)
    - Include a site map detailing the location of the secondary containment structure(s) as an attachment.
  - Areas regulated under Part 201 of the NREPA
    - Include a detailed description of the areas regulated under Part 201 of the NREPA as an attachment. The description should include but not be limited to the following information: List of contaminants causing the listing, locations of contaminated material onsite, depth of contaminants in the soil, pollutant sources, etc.
  - Other areas of concern identified by WRD
    - Include an attachment that provides information detailing the reason WRD is requiring a STSWCS at the facility.
- ✓ A description of how the storm water will be discharged from the special-use area(s) (e.g. open valve, submersible pump, overland flow to catch basin, etc.) and identification of the impacted discharge points.
- ✓ The potential contaminants (e.g. diesel, gasoline, oil, etc.) of concern in the special-use area(s). Generally, these will be the materials stored in the secondary containment structure(s), pollutants that have been identified as causing water quality concerns, or pollutants that caused the site to be regulated under Part 201 of the NREPA as an area of environmental contamination.

Yes, the study plan includes all applicable items in this section.

## Section 4: Sample Collection and Handling

*Permit conditions to consider when completing this section:*

- ❖ *Samples shall be collected during normal facility operating hours from discharges resulting from qualifying storm events occurring within three consecutive quarters, unless otherwise stated in the approved study plan. Quarters are defined as January through March, April through June, July through September, and October through December.*
  - ❖ *A qualifying storm event is defined as a storm event causing greater than 0.1 inch of rainfall and occurring at least 72 hours after the previous measurable storm event that also caused greater than 0.1 inch of rainfall.*
  - ❖ *Personnel collecting samples manually for the STSWCS must be an Industrial Storm Water Certified Operator or meet the permit conditions to be considered Qualified Personnel.*
- ✓ The study plan includes a minimum of three sampling events and lists the approximate consecutive calendar year quarters the sample events will occur in (e.g. 2022 2nd Quarter, 2022 3rd Quarter, and 2022 4th Quarter).
  - ✓ A description of the monitoring locations at which the samples will be collected.
  - ✓ A site map detailing the monitoring locations.
  - ✓ Type of sampling method (grab or composite). If composite was chosen as the sampling method, the sampling plan should include the reason why the method was chosen.
  - ✓ A description of how the samples will be collected (manually by staff or auto-sampler).
  - ✓ A description of the timing for sampling events (e.g. within the first 30 minutes of discharge from each qualifying storm event or whenever discharge from the containment area becomes necessary).
  - ✓ A list of any employees or consultants participating in the STSWCS and their responsibilities.

Yes, the study plan includes all items in this section.

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## Section 5: Sample Analysis

- ✓ A list of the pollutants that will be monitored and analyzed during the STSWCS. The list shall include all pollutants that the permittee knows, or has reason to believe, are present in the special-use area(s), as well as any additional parameters (e.g., hardness, pH, temperature, etc.) that may be needed to adequately evaluate certain pollutant concentrations in the discharge. In addition, the appropriate United States Environmental Protection Agency method and the quantification level needs to be specified for each parameter.
- ✓ Identification of the laboratory that will perform the analysis

Yes, the study plan includes all items in this section.

## Section 6: Final Report

The final report is required to be submitted to WRD within 90 days of the final sampling event. The final report shall include:

- ✓ The dates and times the samples were collected and the name(s) of the personnel who collected each sample.
- ✓ The dates the samples were analyzed and all analytical results including copies of the lab sheets provided by the laboratory.
- ✓ The following information for each qualifying storm event included in the STSWCS:
  - The qualifying storm event's date and duration.
  - A measurement or estimate of the rainfall.
  - The time (in days) elapsed between the qualifying storm event sampled and the end-date of the previous qualifying storm event.
- ✓ An explanation for any pollutants detected during the STSWCS and corrective actions that have been or will be taken to address issues identified during the STSWCS.

Yes, the final report will be submitted to WRD as required and will include all items in this section.

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