BENCHMARK MONITORING COMPLIANCE GUIDANCE

STATE OF MICHIGAN INDUSTRIAL STORMWATER PROGRAM

In 2016, the Michigan Department of Environment, Great Lakes, and Energy's (EGLE) WRD began implementing benchmark monitoring requirements in stormwater permits associated with special use areas. The purpose of benchmark monitoring is to provide data to help characterize the quality of stormwater discharged from facilities classified under Standard Industrial Classification (SIC) codes 5015 (Motor Vehicle Parts, Used) and SIC code 5093 (Scrap and Waste Material). Data obtained during the Benchmark Monitoring Study are compared to benchmark concentration values listed in the stormwater permit as a means of evaluating the effectiveness of the stormwater management controls at the facility.

The benchmark monitoring requirements in stormwater permits associated with special use areas include options the permittee needs to consider. All the options require a written submittal via MiEnviro within six months of issuance or reissuance of permit coverage. The Benchmark Monitoring Compliance Report (Report) under the facility's MiEnviro 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 stormwater permit. The options to consider are explained in detail below:

OPTION 1

The permittee elects to conduct benchmark monitoring immediately and submits the Benchmark Monitoring Study Plan (study plan) within six months of issuance or reissuance of permit coverage. Under this option the permittee should note the following conditions:

- ✓ **The supporting documentation shall include:**
  - A study plan that meets the conditions of the general permit.
  - A StormWater Pollution Prevention Plan (SWPPP) that meets the conditions of the general permit including the additional sector-specific controls. *See below for sector specific controls.*
- ✓ In most cases, the study plan will be reviewed by WRD. The permittee shall correct any deficiencies identified by WRD and resubmit the revised study plan within **30 days**. Once the study plan is approved, the permittee shall begin monitoring in accordance with the approved plan.
- ✓ If the WRD does not take action to comment on the study plan within **90 days** of submittal, the permittee shall begin monitoring in accordance with the submitted study plan.
- ✓ Benchmark monitoring shall be performed concurrently with the visual assessment monitoring.

OPTION 2

The permittee elects to submit a written request to postpone benchmark monitoring until after additional structural controls and/or site modifications are implemented. The written request for an alternative schedule for benchmark monitoring shall be submitted within six months of issuance or reissuance of permit coverage. Under this option the permittee should note the following conditions:

- ✓ **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.
- ✓ In most cases, the alternative schedule request will be reviewed by WRD. The permittee shall correct any deficiencies identified by WRD and resubmit a revised alternative schedule request within 30 days. Once the alternative schedule is approved, the permittee shall begin implementing the actions identified in the alternative schedule for benchmark monitoring.
- ✓ If the WRD does not take action to comment on the alternative schedule request within 90 days of submittal, the permittee shall begin implementing the actions identified in the submitted alternative schedule for benchmark monitoring.
- ✓ 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 MiEnviro the permittee is certifying that:

- ✓ The facility is in full compliance with the conditions of the general permit including the additional sector specific SWPPP conditions identified below.
- ✓ Visual assessments from the three most recent monitoring events confirm the effectiveness of the nonstructural and structural controls implemented onsite.
- ✓ 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 stormwater 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.

Under this option the permittee should note the following conditions:

- ✓ **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.*
  - The three most recent quarterly visual assessment reports which shall include a color photo of the water samples.
- ✓ If the WRD 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.
- ✓ In some cases, approval to forego benchmark monitoring may be delayed until the permittee has had a chance to collect and document three visual assessments.
- ✓ The WRD may at any time deny approval to forego benchmark monitoring if it is determined that the permittee is not meeting the criteria for such approval.
- ✓ If the request to forego monitoring is denied, the permittee must submit an alternative schedule request for benchmark monitoring or study plan within **90 days** of receiving the notice of denial.

For permittees selecting to pursue **Option 1** or **2** above, a Benchmark Monitoring Plan template 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 Stormwater webpage.

ADDITIONAL SWPPP CONTROLS

The additional permit required sector specific SWPPP controls for Auto Salvage (SIC Code 5015) & Scrap and Waste Recycling (SIC Code 5093) facilities are described below:

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).
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 and (5093 only) instruction on procedures for inspecting inbound materials to minimize the potential for significant materials to contaminate stormwater.

STRUCTURAL CONTROLS

The SWPPP shall provide a description of the location, function, design criteria, and installation/ construction schedule of structural controls for stormwater 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) stormwater 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.
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:

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 stormwater.
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.
   c) all structural controls specified in the SWPPP.

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